

DRAFT

Draft BEREC Work Programme 2027

BEREC aims at fostering independent, forward looking, consistent and high-quality regulation of digital infrastructures and services for the benefit of Europe and its citizens



Contents

INTRODUCTION.....	3
BEREC WORK IN 2027.....	3
1. Strategic priority: Promoting full connectivity and the Digital Single Market.....	5
1.1. BEREC inputs to the Digital Networks Act	5
1.2. The telecom single market: market and economic approach	5
1.3. Report on the Application of Fair and Reasonable Pricing within the SMP Framework	5
1.4. Report on access conditions to state-aid funded networks	7
1.5. Opinion on the national implementation and functioning of the general authorisation	8
1.6. Contribution to the EC report on the roaming regulation	8
1.7. Contribution to the intra-EU communications regulation	9
1.8. Contribution to the review of the Recommendation on relevant markets	9
1.9. Contribution to the Guidelines on Access to existing physical infrastructure.....	10
1.10. Workshop on the delineation of copper switch-off areas in light of the DNA	11
1.11. Contribution to the initiatives related to the Digital Fitness Check.....	11
1.12. Ad hoc input to the EU Institutions and support to National Regulatory Authorities (NRAs)	12
2. Strategic priority: Supporting competition-driven and open digital ecosystems.....	13
2.1. Direct to device satellite communications: current & future regulatory and harmonisation challenges	13
2.2. Workshop on the barriers to the provision of electronic communication services	14
2.3. Contribution to the implementation of the Data Act.....	15
2.4. Contribution to the implementation of the Digital Markets Act.....	16
2.5. Report on the impact of generative AI on internet openness	17
3. Strategic priority: Empowering end-users	18
3.1. Report on the IP interconnection.....	18
3.2. Implementation of the Open Internet Regulation and the BEREC Open Internet Guidelines	18
3.3. Collaboration on internet access service measurement tools	19
3.4. Monitoring issues and best practices related to 2G/3G phaseouts	20
3.5. Report on practices for ensuring equivalence of access and choice with respect to accessibility.....	21
3.6. Opinion on end users' rights	22
3.7. Workshop on end-user rights	22
4. Strategic priority: Contributing to environmentally sustainable, secure and resilient digital infrastructures.....	24
4.1. Combatting fraud.....	24
4.2. Advancing towards environmental data collection and contributing to the code of conduct for the sustainability of telecommunications networks.....	25
4.3. Sustainable AI for greener digital infrastructures: Understanding the environmental implications of AI in the telecoms and ICT sector.....	26
4.4. Reinforcing EU's resilience capabilities.....	26
4.5. Workshop on IPv6 deployment	27
5. Strategic priority: Strengthening BEREC's capabilities and continuous improvement	28
5.1. Monitoring and supporting data-driven regulation	28
5.1.1. Connectivity and competition monitor: market snapshots	28
5.1.2. 33 rd International Roaming benchmark data and monitoring report.....	29
5.1.3. 8 th Intra-EU communications Benchmark Report	29
5.1.4. Fostering coordination and efficient data gathering for digital markets.....	30
5.1.5. WACC parameters' calculation according to the EC Notice	30
5.1.6. Report on regulatory accounting in practice.....	31
5.1.7. Annual Reports	32
5.2. Planning and communication	32
5.2.1. Work Programme 2028	32

5.2.2.	Public debriefings.....	33
5.2.3.	15 th Stakeholder Forum.....	33
6.	Institutional and international cooperation.....	34
6.1.	Assignment of radio spectrum rights peer review forum	34
6.2.	International Summit 2027	35
6.3.	Ad hoc international and institutional activities	35
7.	Potential BEREC work for 2028 and beyond.....	36
7.1.	Digital Network Act implementation.....	36
7.2.	Report on the cloud and data markets in Europe	37
7.3.	Report on wireless network evolution in the 6G era	37
7.4.	Report on hybrid networks (Wifi/IMT interworking).....	38
7.5.	Guidance on on market analysis under the revised regulatory framework.....	38
7.6.	Report on technical and market trends and regulatory challenges of eSIM provisioning	38



INTRODUCTION

The Body of European Regulators for Electronic Communications (BEREC) was established in 2009 and operates under Regulation (EU) 2018/1971 (the BEREC Regulation) with the aim of pursuing the objectives under Directive (EU) 2018/72 of the European Parliament and the Council establishing the European Electronic Communication Code (EECC) and in particular to ensure the consistent implementation of the regulatory framework for electronic communications.

BEREC prepares its annual work programme in accordance with article 21 of the Regulation and the BEREC's strategy for 2026 – 2030 (BoR (25) 189, the BEREC Strategy), aimed to provide guidance to organize and prioritize its work towards clearly defined objectives.

Along these lines, the annual work programme is structured around the high-level strategic priorities defined in the BEREC Strategy (promoting full connectivity and the digital single market, supporting competition-driven and open digital ecosystems, empowering end-users, contributing to environmentally sustainable, secure and resilient digital infrastructures and strengthening BEREC's capabilities and continuous improvement) and the priorities set for institutional and international cooperation.

The 2027 Work Programme has been developed in an inclusive and transparent manner, involving contributions from BEREC's Working Groups, NRAs, EU institutions, and all stakeholders. This approach helps ensure that BEREC remains responsive to market needs, regulatory developments, and end user expectations.

In accordance with the BEREC Regulation, the Outline BEREC Work Programme 2027 was adopted and published by the Board of Regulators on 30 January 2026. On 27 February, BEREC launched an early call for input as the first stage of the process for the Work Programme 2027. The Stakeholder Forum was organised on 31 March 2026. The public consultation on the Draft Work Programme 2027 was launched on 1 October 2026 with the aim to publish the final document in December 2026.

BEREC WORK IN 2027

The annual work programme takes into consideration the market, technical and policy developments identified in the BEREC Strategy. In particular, the 2027 work programme has been developed against the backdrop of the ongoing review of the regulatory framework: the proposal for a Digital Networks Act (DNA)¹ published in January 2026 for the consideration of the European co-legislators. This piece of legislation is meant to be the cornerstone shaping the future of the sector in the EU. In its role as advisory body for the EU institutions for electronic communications, BEREC is committed to provide expert and independent advice to the co-legislators and the European Commission (EC) along the legislative procedure. In

¹ COM(2026) 16 final.

relation to other relevant policy developments, BEREC will also provide support and advice to the EC for the review of the functioning of the roaming and of the intra-EU communications regulation, due by end of June 2027. BEREC will also consider the review of the Digital Decade Policy Program². The EC has put forward a Digital Omnibus³, which will be the first step of the Digital Package on Simplification, aimed at streamlining the EU's digital rulebook specifically for cybersecurity, AI and data. The second step is a Digital Fitness Check aimed to the full review of EU's digital rules to ensure that those are effective, proportionate and fit for the future, analysing the interplay between the different rules, their cumulative impact on businesses, and how effectively they support the EU's competitiveness, values and fundamental rights.

The sectoral regulation in force envisages mandatory tasks for BEREC. In addition to the roaming and intra-EU communications benchmarking reports and the annual monitoring of the Open Internet Regulation Implementation, in 2027 BEREC will have to deliver Opinions envisaged in the EECC on the national implementation and functioning of the general authorisation and on end user rights.

The BEREC work programme follows a multiannual approach meaning that some projects started in 2026 will be completed in 2027 and are, therefore, included as carry overs. Additionally, recurring items such as the regulatory accounting report or the ongoing support to the implementation of the Data Act are considered by default.

Some BEREC international and institutional commitments stem from the different Memoranda of Understanding (MoUs) signed with other bodies. Those include the organization of annual Summits with the National Regulatory Authorities' (NRA) regulatory networks in other regions, namely EMERG (European Mediterranean Regulators Group), REGULATEL (Latin American Forum of Telecommunications Regulatory Entities) and EaPeReg (Eastern Partnership Regulators' Network). These are alternatively organized in Europe and in the regions of BEREC's counterparts. In 2027, the Summits will be jointly organized in Europe as a four lateral International Regulatory Summit.

The final source of projects for the work programme stems from the proposals put forward by BEREC members and stakeholders resulting from the collaborative process described in the previous chapter that includes an early open call for input and a public consultation.

During the call for proposals, several additional actions were identified. While considered as interesting, some could not be taken on board considering the envisaged workload. These proposals are intended to serve as input for future reflection and are outlined in the final chapter.

² <https://digital-strategy.ec.europa.eu/en/news/commission-seeks-input-review-2030-digital-decade-targets-and-objectives>

³ <https://digital-strategy.ec.europa.eu/en/news/commission-collects-feedback-simplify-rules-data-cybersecurity-and-artificial-intelligence-upcoming>

A detailed description of the main projects to be carried out by BEREC in 2027 is set out in the following sections.

1. Strategic priority: Promoting full connectivity and the Digital Single Market

1.1. BEREC inputs to the Digital Networks Act

Following Article 122 of the EECC, the EC carried out a review of the functioning of the EECC. In January 2026, the EC published its Report to the European Parliament and the Council on the functioning of the EECC⁴. Also in January 2026, the EC published its proposal for a Digital Networks Act.

BEREC, as an advisory body to the EU institutions, has analysed such legislative initiative and provided its expert views. BEREC is committed to continue supporting the EU institutions throughout the legislative process. In 2027, if the legislative procedure is sufficiently advanced, BEREC will start working on early preparatory work for the implementation of the DNA and reflect on the novelties that the new framework may incorporate.

Deliverable: BEREC inputs to the Digital Networks Act

Public consultation: No

Adoption of deliverable for publication: throughout the European legislative process

1.2. The telecom single market: market and economic approach

The concepts of the “Telecom Single Market” and the wider “Digital Single Market” have been among the primary policy objectives of the EU for many years. Already in the 2015 Communication on “A Digital Single Market Strategy for Europe”⁵, the EC described the Digital Single Market as “one in which the free movement of goods, persons, services and capital is ensured and where individuals and businesses can seamlessly access and exercise online activities under conditions of fair competition, and a high level of consumer and personal data protection, irrespective of their nationality or place of residence”. At the same time, the currently applicable regulatory framework⁶ lists the contribution to the development of the internal market as a general objective to be pursued by the NRAs and other competent authorities, among others. Specifically, the EECC prescribes the removal of remaining obstacles and facilitating investments, the development of common rules and predictability in regulation, favouring “the effective, efficient and coordinated use of radio spectrum, open

⁴ COM (2026) 35 final.

⁵ COM(2015) 192

⁶ Article 3 EECC, para 2, c).

innovation”, trans-European networks, interoperability of pan-European services and end-to-end connectivity.

Although there is not one single definition of the digital single market embedded in the EU legislation, various policy papers, communications, legislative initiatives, as well as supporting studies and documents have examined the digital single market and the telecoms single market from a wide range of perspectives. Recently, the EC’s White Paper – “How to master Europe’s digital infrastructure needs?” revisited the concept of the single market for electronic communications from economic, technical and regulatory perspectives, pointing to different supply and demand conditions, network architectures, levels of coverage of VHCNs, spectrum authorization procedures and so on.

At the same time, views differ among policy makers, regulators, stakeholders, academics and consumers regarding how a fully functioning single market should look like in practice, and which measures would be the most effective in achieving it.

With this workstream, BEREC aims to explore the economic dimensions that can be attached to the concept of the ‘single market’ for electronic communications. Particularly, BEREC would examine (i) the outcomes that a “single market” in electronic communications should be expected to deliver in practical terms, (ii) whether there is evidence of unmet demand for pan-European products and, if so, look at implications for the current market framework, and (iii) operators’ incentives and barriers to providing pan-European services. At the same time, BEREC may consider launching a call for evidence in order to gather the views of market participants on the topic and potentially reflect on those as well during the planned dedicated workshops.

Deliverables: Several workshops on the telecom single market

Call for evidence (TBC)

Adoption of the summary of the workshops at Plenary 4 2027

1.3. Report on the Application of Fair and Reasonable Pricing within the SMP Framework

The Staff Working Document accompanying the Gigabit connectivity Recommendation (EU) 2024/539 of 6 February 2024 (Gigabit Recommendation)⁷ highlights the possibility of establishing fair and reasonable pricing as an SMP obligation in scenarios where strict quantitative price controls are not required. This type of pricing regulation is particularly relevant when some level of pricing flexibility has been granted to operators, but the NRAs still retain the ability to intervene if prices are deemed inappropriate or excessive. Additionally, fair

⁷ Recommendation on the regulatory promotion of gigabit connectivity. C(2024) 523

and reasonable pricing is the main form of price regulation permitted for wholesale-only operators.

To date, there is very limited guidance on how the fair and reasonable obligation should be interpreted within the SMP framework. As a result, different NRAs have adopted varying approaches to implementing and monitoring such obligations.

This BEREC report shall present an in-depth review of the interpretations and applications of fair and reasonable pricing obligations within the SMP framework across Europe.

The scope will include an overview of NRAs' approaches, providing a comprehensive description of the context in which regulatory authorities use fair and reasonable pricing (i.e. in which markets and circumstances), including their reasoning and motivations, and how they implement and monitor those obligations. If possible, BEREC will also identify potential patterns, highlighting trends and/or specific approaches adapted to particular market contexts.

Comparisons with other frameworks could also be included in order to explore potential synergies or differences on how fair and reasonable pricing is interpreted in other regulatory contexts, such as under the provisions of Gigabit Infrastructure Act⁸ (GIA).

The main findings of BEREC will be available by the end of 2026 for public consultation, while the adoption of the final report is foreseen for mid-2027.

Deliverable: Report on the Application of Fair and Reasonable Pricing within the SMP Framework

Adoption of the final report at Plenary 2 2027

Adoption of the outcome of the consultation Summary Report at Plenary 2 2027

1.4. Report on access conditions to state-aid funded networks

In recent years, state-aid-funded FTTB/H networks have been rolled out in most EU Member States. These networks have to offer wholesale access at certain terms and conditions which are of significant importance for the development of competitiveness in these underserved areas going forward.

According to the Broadband State Aid Guidelines, "Member States must consult NRAs on wholesale access products, conditions and pricing. NRAs are encouraged to provide guidance [...]". It can therefore be assumed that several NRAs have gained experience in determining access conditions to state-aid-funded networks, including on specifics related to economical and technical feasibility.

⁸ Regulation (EU) 2024/1309 on measures to reduce the cost of deploying gigabit electronic communications networks

BEREC is planning to develop an overview of NRAs' approaches undertaken for the evaluation of the appropriate wholesale access conditions to fixed state-aid-funded networks from an economical and technical perspective, accompanied by details on price determination. The focus will be on both active and passive access services.

BEREC's report will build on a dedicated data collection exercise from the NRAs and will promote experience exchange, with the aim of contributing to dissemination and harmonisation of practices.

The main findings of BEREC will be available in the second half of 2026 for public consultation, while the adoption of the final report is foreseen for early 2027.

Deliverable: Report on access conditions to state-aid funded networks

Adoption of the outcome of the consultation Summary Report for publication at Plenary 1, 2027

Adoption of the final report for publication at Plenary 1, 2027

1.5. Opinion on the national implementation and functioning of the general authorisation

Article 122(3) of the EECC establishes that BEREC shall publish, by 21 December 2021 and every three years thereafter, an Opinion on the national implementation and functioning of the general authorisation, and on their impact on the functioning of the internal market. Pursuant to this obligation, BEREC published a first Opinion on 9 December 2021, and a subsequent Opinion on 5 December 2024.

Considering the obligation of periodical review of the functioning of the general authorisation (every three years starting from 2021), the following review should be conducted by the end of 2027. The Opinion will take stock of the functioning of the general authorisation regime under the EECC and assess any preparatory work that may be required to implement potential changes introduced by the DNA.

Deliverable: Opinion on the national implementation and functioning of the general authorisation

Public consultation: No

Timing: Adoption of the final report at Plenary 4, 2027, for publication

1.6. Contribution to the EC report on the roaming regulation

By 30 June 2027, the EC shall submit an interim report to the European Parliament and to the Council, based on the data collected by BEREC pursuant to Article 21(2) of the Roaming Regulation, followed, if appropriate, by a legislative proposal to amend the Regulation.

In 2026, BEREC has been requested by the EC to provide a BEREC Opinion for this interim review report on the Roaming Regulation as well as on the Commission Implementing Regulation on Fair Use and Sustainability by the end of Q1 2027.

Deliverable: Contribution to the EC report on the roaming regulation

Timing: Adoption of the final report at Plenary 1, 2027, for publication

1.7. Contribution to the intra-EU communications regulation

By 30 June 2027, after consulting BEREC, the EC shall review Article 5a of the Regulation (EU) 2015/2120 regulating intra-EU communications. Based on the assessment of its impact, the EC may, if appropriate, decide to submit a legislative proposal to amend it. BEREC will provide its Opinion in accordance with the EC request.

In addition, by 30 June 2028, the EC shall, after consulting BEREC, adopt an implementing act laying down the technical rules on safeguards, such as sustainability, fair use and anti-fraud measures that are needed for the abolition of different retail prices to consumers for domestic communications and intra-EU communications. BEREC will start working during 2027 on the preparation of its Opinion in accordance with the EC request.

Deliverable 1: Opinion on the intra-EU communications regulation

Timing: TBD (depending on the EC's timeline)

Deliverable 2: Contribution to the intra-EU communications implementing act

Timing: TBD (depending on the EC's timeline)

1.8. Contribution to the review of the Recommendation on relevant markets

According to Article 64 (1) of the EECC, the EC shall review the Recommendation on Relevant Product and Service Markets⁹ (RRM) on a regular basis. The Recommendation shall identify those product and service markets within the electronic communications sector, the characteristics of which may justify the imposition of regulatory obligations set out in the EECC. This shall be done without prejudice to markets that may be defined in specific cases under competition law. In this endeavour, the EC must take into utmost account the BEREC Opinion on this Recommendation.

BEREC underscores the importance of this Recommendation for one of the NRAs core competences - the market analysis procedures. BEREC is committed to contribute actively to

⁹ Commission Recommendation (EU) 2020/2245 of 18 December 2020 on relevant product and service markets within the electronic communications sector susceptible to ex ante regulation in accordance with Directive (EU) 2018/1972 of the European Parliament and of the Council establishing the European Electronic Communications Code.

the process and provide support by participating in exchanges and workshops with the EC, delivering reasoned contributions as deemed necessary in order to ensure that BEREC's questions and concerns are clarified and addressed, as well as to provide the EC with developments in NRAs' knowledge regarding the functioning of the markets.

Once the review is launched by the EC, BEREC's work will be developed by first organizing a workshop with stakeholders on the revision of the RRM to discuss the industry's perspectives on the revision of the Recommendation. This workshop will help BEREC understand better the worries of the industry regarding the way forward as regards the market analysis procedures.

Subject to the EC timeline, BEREC will deliver the Opinion on the review of the Recommendation on relevant markets foreseen by the EECC. The Opinion will be based on the documents supporting the RRM review and its draft text proposal.

Deliverable 1: Summary of external workshop on the revision of the Recommendation on relevant markets

Deliverable 2: Opinion on the Recommendation on relevant markets susceptible to ex ante regulation

Deliverable 3: other contributions to the review (TBD, e.g. opinions, workshops, knowledge-building, reports, etc.)

Timing: TBD (depending on the EC's timeline)

1.9. Contribution to the Guidelines on Access to existing physical infrastructure

The GIA aims at facilitating and stimulating the roll-out of VHCNs so that such networks can be rolled out faster and at a lower cost. In order to achieve that, the GIA, for example, sets rules for access to existing physical infrastructure. According to Article 3 (1), network operators and public sector bodies owning or controlling physical infrastructure shall meet, upon written request of an operator, all reasonable requests for access to that physical infrastructure under fair and reasonable terms and conditions, including price, with a view to deploying elements of VHCNs or associated facilities. Article 3 (13) stipulates that the EC, in close cooperation with BEREC, may provide guidance on the application of Article 3 GIA.

The EC launched a call for stakeholder input based on a questionnaire in summer 2025 and published the related factual summary report on 1 June 2026. Subsequently, BEREC has started to cooperate with the EC on the development of Guidelines. The timeline will depend



on the EC needs. The EC is the penholder for these Guidelines, while BEREC is in a supporting role.

Deliverable: Contribution(s) to the Guidelines on Access to existing physical infrastructure

Timing: TBD (depending on the EC's timeline)

1.10. Workshop on the delineation of copper switch-off areas in light of the DNA

The DNA proposal mandates the phased retirement of legacy copper. The relevant geographical unit for the implementation of copper switch-off will be so called copper switch-off (CSO) areas. It is foreseen that NRAs must first delimit CSO areas and publish a CSO area list (preliminary list by 31 May 2028) following EC guidance and then monitor for 95% premises-passed fiber coverage and affordability (first check by 30 June 2029).

This project aims to (1) evaluate how different countries have delineated CSO areas so far and the challenges encountered, and (2) identify feasible, DNA compatible approaches and scenarios for future CSO delimitations.

A questionnaire will collect NRA expert input, and a workshop will discuss the results with external experts and stakeholders. The final report will be built on the analysis of the call for input among NRAs and on the findings of the external workshop, synthesising lessons learned into practical recommendations intended to provide valuable input to the Commission's guidance on harmonized criteria in 2028.

Deliverable 1: workshop on the delineation of copper switch-off areas in light of the DNA

Timing: June 2027

Deliverable 2: Summary report on the external workshop on the delineation of copper switch-off areas in light of the DNA

Public consultation: no

Timing: Adoption of the final report at Plenary 4 2027

1.11. Contribution to the initiatives related to the Digital Fitness Check

The EC has put forward a Digital Omnibus, which will be the first step of the Digital Package on Simplification, aimed at streamlining the EU's digital rulebook specifically for cybersecurity, AI and data. The second step is a Digital Fitness Check aimed to the full review of EU's digital rules to ensure that those are effective, proportionate and fit for the future, analysing the

interplay between the different rules, their cumulative impact on businesses, and how effectively they support the EU's competitiveness, values and fundamental rights.

In November 2025, The EC published a call for evidence¹⁰ with the aim to assess the interplay among the different digital regulations, identifying synergies, good practices, and any remaining gaps, overlaps and inconsistencies. Including, *inter alia*, the coherence between definitions and scope as well as the different governance systems for these rules.

The Digital Fitness Check will run in parallel to the DNA legislative procedure, as part of the EU digital package. In this context, particular efforts shall be made to ensure the consistency of both initiatives. Moreover, the DNA aims to respond to the convergence trends and blurring lines among services in the digital ecosystem by introducing new general objectives, such as investments in all digital infrastructures (including cloud and AI solutions), as well as an ecosystem cooperation mechanism. Subject to the outcome of the legislative procedure, the draft DNA places BEREC in the centre of the internet ecosystem coordination for digital infrastructures and services.

Deliverable: BEREC inputs to the Digital Fitness Check

Public consultation: No

Timing: throughout the European legislative process

1.12. Ad hoc input to the EU Institutions and support to National Regulatory Authorities (NRAs)

In line with Article 4 of the BEREC Regulation, BEREC assists and advises the NRAs, the European Parliament, the Council and the EC, and cooperates with the NRAs and the EC – upon request or on its own initiative – on any technical matter regarding electronic communications within its remit.

BEREC has been providing a forum for NRAs to discuss matters related to the electronic communications regulatory framework and has contributed to EU institutions on key legislative initiatives in the sector.

¹⁰ https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/15554-Digital-fitness-check-testing-the-cumulative-impact-of-the-EUs-digital-rules_en

BEREC will also make itself available to engage with the EC in relation to matters concerning any further sectoral legislative initiatives.

Deliverable: Various inputs (report, workshop, opinion, position paper, etc.) on request of the EU institutions or NRAs

Public consultation: No

Timing: subject to the EU institutions or NRA's request

2. Strategic priority: Supporting competition-driven and open digital ecosystems

2.1. Direct to device satellite communications: current & future regulatory and harmonisation challenges

Direct to mobile-Device satellite (D2D) connectivity is already available in different forms, such as a capability to send SOS messages via satellite on certain newer smartphones. The use of D2D is likely to grow further in the coming years. BEREC has also held workshops on this topic before in 2023 and 2024 (see also [BEREC Workshop on secure and reliable connectivity from LEO satellite fleets](https://www.berec.europa.eu/en/events/berec-workshop-on-secure-and-reliable-connectivity-from-leo-satellite-fleets)¹¹, [BEREC external workshop about the usage of satellite technologies in mobile communications](https://www.berec.europa.eu/en/events/berec-external-workshop-about-the-usage-of-satellite-technologies-in-mobile-communications)¹² and [BEREC Internal Workshop on Direct to Device Satellite Communication](https://www.berec.europa.eu/en/all-documents/berec/reports/summary-report-on-internal-workshop-on-direct-to-device-satellite-communication)¹³).

In line with the stakeholder interactions of the past few years on the topic of satellite connectivity services, and also considering expected discussions in WRC2027, and considering that the EU mandate to CEPT on D2D foresees the finalisation of the spectrum regulatory framework by mid-2027, BEREC plans a further deepening of the analysis of regulatory implications of the development of D2D services, by a combination of information exchange by a group of BEREC D2D matter experts (including RSPG), and the organization of an workshop on current & future regulatory challenges of D2D satellite communication, where external presentations may be included.

Topics at this workshop could include a first approach with regard to BEREC related topics such as: a) minimal set of harmonised licence conditions; b) potential arising competitive issues and possible regulatory responses; c) authorization processes for D2D services; d) integration with terrestrial networks, data localization, impact on roaming, support of legal intercept; e) emergency call and emergency services and network resilience; f) potential

¹¹ <https://www.berec.europa.eu/en/events/berec-workshop-on-secure-and-reliable-connectivity-from-leo-satellite-fleets>

¹² <https://www.berec.europa.eu/en/events/berec-external-workshop-about-the-usage-of-satellite-technologies-in-mobile-communications>

¹³ <https://www.berec.europa.eu/en/all-documents/berec/reports/summary-report-on-internal-workshop-on-direct-to-device-satellite-communication>

impact of D2D offers on spectrum awards, for instance with regards to coverage requirements or to which spectrum blocks are in higher or lower demand for use for D2D.

Depending on the observations and discussions made during the workshop BEREC may prepare more substantial work for 2028.

Deliverable 1: workshop(s) on direct to device satellite communications: current & future regulatory challenges

Timing: Q2/Q3

Deliverable 2: workshop summary report “Direct to device satellite communications: current & future regulatory and harmonisation challenges”

Public consultation: No

Timing: Adoption at Plenary 3 2027

2.2. Workshop on the barriers to the provision of electronic communication services

In the last years, BEREC has analysed a set of actual and potential restrictions imposed by some large operating system (OS) providers and device manufacturers which are affecting electronic communications networks and electronic communications services (ECN/ECS) providers’ ability to correctly give access to services or to the network itself¹⁴. Examples include the difficulties that some MVNOs and smaller mobile operators seem to face in setting up some functionalities of the devices (e.g. APN-related services, VoLTE, VoWiFi), in activating 5G capabilities on the devices, in configuring the network profile when eSIMs are used, or the impact on continuity of services in the context of 2G and 3G phase-out¹⁵.

Against this background, MVNOs, or small MNOs, may have issues in putting forward preferred functionalities and associated profile alignments in standards, as well as in implementing them. Some ECS providers report burdensome and time-consuming processes to coordinate tests and verifications of terminals with device manufacturers/OS providers. Moreover, not all market players have access to the same resources and capabilities to solve these issues, and, as a result, the market dynamics in the provision of ECS/ECN can be affected.

In order to keep investigating these dynamics, BEREC will organise an internal workshop with relevant stakeholders (e.g. main OS providers, device manufacturers, affected ECS providers) focusing in particular on (i) practices between ECN/ECS providers, and OS providers and device manufacturers related to the implementation of key features (e.g. ability to conclude agreements, commercial conditions, bundling with other services or products, etc.), (ii) the

¹⁴ BoR (24) 139, BEREC Report on the entry of large content and application providers into the markets for electronic communications networks and services.

¹⁵ BoR (23) 204, Report on practices and challenges of the phasing out of 2G and 3G.

main stakeholders involved in these practices, and (iii) the impact of these practices on competition in the ECS markets (e.g. between MNOs and MVNOs, barriers to entry and expansion). The internal nature of the workshop aims to increase openness of discussion. A summary report highlighting the main conclusions may also be published.

Beyond this workshop and in order to carry out evidence and fact-based analyses, BEREC stresses again the need to collect relevant data from the actors who can have an impact on the ECS/ECN markets which are regulated.

Deliverable 1: Workshop on the barriers to the provision of electronic communication services.

Timing: Q3 2027

Deliverable 2: Summary report of the Workshop on the barriers to the provision of electronic communication services (TBC).

2.3. Contribution to the implementation of the Data Act

The Data Act became applicable in September 2025. BEREC has provided its expertise in the context of the Data Act by producing a variety of deliverables such as the High-Level Opinion on the EC's proposal for a Data Act¹⁶, a workshop on switching and interoperability of data processing services, a workshop on Internet of Things (IoT), both held in 2023, a report on cloud services and edge computing¹⁷, and an external study on the trends and policy/regulatory challenges of cloudification, virtualisation and softwarisation in telecommunications¹⁸. Moreover, BEREC also actively contributes to the implementation of the DMA – including as a member of the DMA High-Level Group (HLG) and of its subgroups – and this regulation also includes provisions concerning data access, vertical and horizontal interoperability. Some obligations under the DMA can also apply to cloud services.

In the Data Act, independent national competent authorities with experience in electronic communications services are considered to be well-placed to ensure the enforcement of specific provisions. In this context, BEREC could provide the cooperation forum to ensure consistency at the European level. Indeed, the majority of BEREC members have either already been designated as the national competent authority for the enforcement of (some chapters of) the Data Act, or are likely to be designated soon. Moreover, some BEREC members have already carried out detailed work concerning competitive or technical aspects of the Data Act cloud-related provisions and the results and analysis are regularly shared and discussed within BEREC. BEREC has also been meeting with relevant stakeholders to gather their inputs and develop a common understanding on the obligations, definitions, legal and technical questions arising from the Data Act.

¹⁶ BoR (22) 54

¹⁷ BoR (24) 136

¹⁸ BoR (23) 208

In its response to the public consultation on the draft Digital Omnibus¹⁹, BEREC puts forward some concrete proposals on how the Data Act could be amended to ensure a harmonised implementation of its cloud-related provisions across Europe. The proposals include developing a common interpretation of the provisions, providing technical advice for the development of standards and the adoption of common specifications, issuing guidelines, assisting the EC in monitoring market dynamics, and more generally in providing a forum for cooperation among competent authorities on a variety of topics concerning the implementation of the regulation.

BEREC will continue to provide a cooperation forum to discuss all these topics and to contribute to the streamlined and efficient interplay between the Data Act and other EU digital regulatory frameworks where BEREC has competences.

Deliverable: Contribution to the implementation of the Data Act (TBD, e.g. opinions, workshops, knowledge-building, reports, etc.)

Timing: throughout the year

2.4. Contribution to the implementation of the Digital Markets Act

BEREC has been playing an active role in assisting the EC in the implementation of the Digital Markets Act (DMA).

Article 7 of the DMA includes interoperability obligations for NI-ICS and the Regulation provides for a close cooperation between the EC and BEREC for the enforcement of this provision. Against this backdrop, since early 2024 the EC has requested BEREC to determine whether the technical details and the general terms and conditions published in the gatekeeper's reference offer are in compliance with the interoperability obligation. BEREC has already delivered three opinions on the matter²⁰.

BEREC is also a member of the DMA HLG. The role of the HLG is to provide the EC with advice and expertise on any general matter of implementation or enforcement of the DMA and the promotion of a consistent regulatory approach across different regulatory instruments. It can also provide expertise to the EC on the need to amend, add or remove DMA rules to ensure that digital markets across the Union are contestable and fair. BEREC experts are also contributing to the three HLG subgroups dedicated to data, interoperability and artificial intelligence (AI). Moreover, BEREC put forward several proposals in its response to the EC's consultation on the first review of the DMA²¹ and is actively contributing to the discussions within the HLG.

More generally, BEREC will keep monitoring and analysing developments in the digital markets and the impact and effects of the practices implemented by large online platforms.

¹⁹ BoR (26) 23_2

²⁰ <https://www.berec.europa.eu/en/all-topics/ni-ics-interoperability>

²¹ BoR (25) 119

Special attention will be paid to those practices which may not be addressed by current legislations.

Deliverable: Contribution to the implementation of the Digital Markets Act (TBD, e.g. HLG meetings, opinions, reports, workshops, knowledge-building, etc.)

Timing: Throughout 2027

2.5. Report on the impact of generative AI on internet openness

AI is increasingly becoming a relevant component of the (digital) economy.

BEREC has already produced several deliverables on AI and related topic in the last years, such as BEREC high-level position on artificial intelligence and virtual worlds²², BEREC Report on the impact of AI solutions in the telecommunications sector²³, BEREC Report on Cloud and Edge Computing Services²⁴ and BEREC external study on the trends and cloudification, virtualization, and softwarization in telecommunications²⁵. Moreover, BEREC Report on the Internet Ecosystem²⁶ aimed at understanding how users' internet experience is affected by the different elements of the internet ecosystem in terms of competition and internet openness.

As highlighted in the above-mentioned BEREC High-level position, AI has the potential to enrich user experience and complement traditional ways of accessing online content and services. However, AI can also affect the overall user experience on the internet as it has the potential to directly influence the way users access online content/services and possibly, therefore, their freedom of choice.

BEREC will produce a report to further analyse the impact of generative AI on internet openness – which can be defined as the ability of users to access and distribute information and content online, without unlawful interference or discrimination, as well as their ability to innovate. This can typically happen when generative AI structures, filters or summarizes the information and content which is provided to users. In this line, the report will also reflect on the impact on the variety and the richness of the internet, as well as on the incentives to create and share content, and innovate, in a context where content is generated and provided within the generative AI services and the traffic to the related sources is negatively affected. Among other topics, the report will also highlight the technical interfaces and touchpoints between generative AI and other services or essential resources (e.g. data) and focus on protocols which are developed by several parties and are not provider specific.

²² BoR (24) 68

²³ BoR (23) 93

²⁴ BoR (24) 136

²⁵ BoR (23) 208

²⁶ BoR (22) 167

The main findings of BEREC will be available in the second half of 2026 for public consultation, while the adoption of the final report is foreseen for early 2027.

Deliverable: BEREC report on the impact of generative AI on internet openness

Timing: Adoption of the final and the outcome of the consultation summary reports at Plenary 1 2027

3. Strategic priority: Empowering end-users

3.1. Report on the IP interconnection

The debate about IP interconnection was revived in 2021/2022 and has gained momentum. A first BEREC report was published in 2012²⁷. Since then, BEREC has followed the IP interconnection markets in 2017²⁸ and 2024²⁹.

BEREC sees a need to regularly assess the state of the market and to re-evaluate its earlier findings. In this report, BEREC will assess the current trends and developments in the market since 2024, such as utilization of paid peering and CDNs. If necessary, the workstream may also include qualitative and quantitative data collection by means of ad-hoc questionnaires, surveys, workshops, and so on, to collect further information relevant to this analysis.

Deliverable: Report on the IP interconnection ecosystem

Public consultation: Yes

Timing: Adoption of draft report for public consultation at Plenary 4, 2027

Adoption of the final and the outcome of the consultation summary reports at Plenary 2, 2028

3.2. Implementation of the Open Internet Regulation and the BEREC Open Internet Guidelines

The Open Internet Regulation (OIR)³⁰ prescribes that NRAs should 'closely monitor and ensure compliance' with the Regulation and should 'publish reports on an annual basis regarding their monitoring and findings'.

²⁷ BoR (12) 130

²⁸ BoR (17) 184

²⁹ BoR (24) 177

³⁰ Regulation (EU) 2015/2120 of the European Parliament and of the Council of 25 November 2015 laying down measures concerning open internet access and retail charges for regulated intra-EU communications

Since 2017, BEREC has annually published a Report on the implementation of the OIR and provided an internal forum to discuss national cases and questions in order to ensure a predictable and consistent application of the Regulation.

In 2027, BEREC will monitor the implementation of the OIR provisions among NRAs for the period from 1 May 2026 to 30 April 2027. BEREC will collect the annual national OI Reports and the answers to an internal questionnaire to prepare the annual European-level OI Report.

To support the NRAs' obligation to 'closely monitor and ensure compliance' with the OIR, a forum will be held to discuss questions relating to the consistent application of the Regulation on an informal basis. The sharing of experience and exchange of important decisions in national cases is essential to foster a consistent application of the OIR throughout Europe in light of evolving markets and technologies. In addition to discussing the national cases, the forum covers the sharing of information on relevant market developments.

When appropriate, the workstream may also include questionnaires, surveys, workshops, etc., to collect information on topics of particular relevance to the OI and to monitor emerging trends, as the market continues to develop, and contribute to any BEREC's work related to Internet evolution. This workstream should build on the experience from previous years.

Deliverable: Report on the implementation of the Open Internet Regulation and the BEREC Open Internet Guidelines

Public consultation: No

Timing: Adoption of final report at Plenary 3, 2027

3.3. Collaboration on internet access service measurement tools

In 2022, BEREC published an update of the BEREC Net Neutrality Regulatory Assessment Methodology³¹, originally released in 2017. Together with the Net Neutrality Measurement Tool Specification³², both documents lay the groundwork for BEREC to work towards a harmonised measurement framework. This goal remains important, and work has continued. BEREC has provided a forum for collaboration between NRAs to share information and exchange experiences and best practices on the national tool deployment.

Through this workstream, BEREC intends to continue the ongoing work with NRAs on their national measurement tool deployment so as to:

- provide a forum for NRAs to share information and exchange experiences and best practices related to the development and deployment of national measurement tools, by taking into account the support of new technologies; this workstream will also identify best

³¹ BoR (22) 72

³² BoR (17) 179

collaboration practices so as to maximise the benefits of existing NRA cooperation in this area; and

- support the migration of interested NRAs towards a harmonised measurement tool by working together to improve the measurements and by sharing codes or components between NRAs.

Deliverable: NRA's forum to cooperate for the development of internet access service measurement tools

Timing: throughout the year

3.4. Monitoring issues and best practices related to 2G/3G phaseouts

For several years, BEREC has pointed to possible serious challenges linked to the 2G/3G phaseout³³. This led to BEREC expert exchanges concerning the difficulties encountered during the shutdown of 2G and 3G networks, and intensified exchanges focusing on issues related to the access to emergency calls (as experienced in Sweden, Iceland and before that, Australia). In 2026, BEREC published a statement in which it urges operators, device manufacturers and all other stakeholders to ensure emergency calls access in the context of 2G/3G phaseout³⁴.

BEREC intends to keep monitoring the issues related to phaseouts and as the market detects analyses and mitigates possible risks and issues with 2G and 3G phaseouts and keeps other stakeholders informed in a timely matter.

A group of experts will support NRA exchange of best practices and where necessary alignment of practices, for instance with regard to public information provision of industry parties, and transparency on challenges and solutions, and potential blocking of devices incapable of 112 connectivity, and coordination thereof between industry parties. Other potential issues to discuss are issues related to roaming, potential SIM or eSIM challenges (when changing subscription while keeping the device, or when changing a device while keeping a subscription), the use of roaming SIMs for high availability applications, the migration of IoT fleets and eCall.

³³ BoR (23) 204

³⁴ BoR (26) 85

To facilitate this, one or two workshops which may include external presentations will be organized, and BEREC reports may be produced discussing best practices and NRAs' options.

Deliverable 1: Workshop on best practices related to 2G/3G phaseouts

Timing: Q2/Q3

Deliverable 2: Summary Report on the workshop on monitoring issues and best practices related to 2g/3g phaseouts

Public consultation: No

Timing: Plenary 3 2027

3.5. Report on practices for ensuring equivalence of access and choice with respect to accessibility

The aim of the European Accessibility Act (EAA)³⁵ is to harmonize accessibility requirements for products and services by eliminating and preventing barriers to the free movement of certain accessible products and services, arising from divergent accessibility requirements and different stages of preparatory activities in Member States. Although the BEREC workshop on end users' rights³⁶ held in April 2024 proved to be a valuable forum for sharing views and concerns related to accessibility (one session was dedicated to this topic), the further focus of BEREC on the matter is crucial in respect to implementation of the accessibility requirements of the EAA.

June 2026 marked one year since the application of the EAA, and on 9 June BEREC held a workshop focusing on digital accessibility progress with respect to electronic communication services (ECS). It provided a timely forum to reflect on the progress achieved and to discuss the next steps in advancing accessibility in ECS and digital services. This workshop serves as an initial step for a report in 2026.

The report also builds on the work done by BEREC in 2015, 2017, and most recently in 2022³⁷, resulting in the BEREC Report on measures on equivalent access and choice for disabled end-users, which collated information from NRAs to create an inventory of measures and initiatives that NRAs have in place to ensure equivalence of access. Articles in the EECC set requirements for the equivalence of choice. There is a correlation between the accessibility requirements of the EAA relating to ECS services and information and those on equivalent access and choice under the EECC.

³⁵ Directive (EU) 2019/882 on the accessibility requirements for products and services

³⁶ <https://www.berec.europa.eu/en/events/berec-workshop-on-end-users-rights>

³⁷ BoR (22) 172

This benchmarking report aims at identifying the solutions in place throughout the Member States to meet the accessibility requirements established in the EECC and in the EAA, which came into force on 28 June 2025.

In order to ensure that the report takes a strategic view of the measures taken, in addition to seeking information from NRAs, BEREC may also seek input from key stakeholders regarding any measures provided independently from those prescribed by the NRAs under other relevant consumer legislation. The role of NRAs in ensuring the accessibility requirements in electronic communications would also be elaborated upon.

The main findings of BEREC will be available in the second half of 2026 for public consultation, while the adoption of the final report is foreseen for 2027.

Deliverable: Report on practices for ensuring equivalence of access and choice with respect to accessibility

Timing: Adoption of the final and the outcome of the consultation summary reports at Plenary 2, 2027

3.6. Opinion on end users' rights

Article 123 of the EECC mandates BEREC to publish, by 21 December 2021 and every three years thereafter, an Opinion on the market and technological developments and on their impact on the application of rights of end-users in the EECC (Title III of Part III). Pursuant to this obligation, BEREC published its first Opinion on 9 December 2021³⁸, and a subsequent Opinion on 5 December 2024³⁹.

Considering the obligation of periodical monitoring of technological and market developments and their impact on the application of the end-user rights (every three years starting from 2021), the following review should be conducted by the end of 2027. The BEREC Opinion will take stock of the functioning of the end user provisions under the EECC and assess any preparatory work that may be required to implement potential changes introduced by the DNA.

Deliverable: BEREC opinion on end users' rights

Public consultation: No

Timing: Adoption of the final report at Plenary 4, 2027, for publication

3.7. Workshop on end-user rights

Connectivity and electronic communications services are now more than ever of great importance to the end users. The efficiency of the end-user rights provisions may be affected by changes in the use of different electronic communications services especially by the

³⁸ BoR (21) 177

³⁹ BoR (24) 180

prevalence of digital platforms as a substitute for traditional electronic communications services.

Recent BEREC work related to end users⁴⁰ showed the importance of exchanging opinions and experiences among all relevant stakeholders in the market, relevant institutions and end users' representatives. Well informed end-users use different types of services and expect a certain quality of user experience, simplicity in contracting and using the services, security of personal data and easy switching process with effective resolution of potential problems. To achieve this goal, it is important to continuously connect all actors in the electronic communication landscape and, when forming joint actions and regulation, take into account the opinions of all relevant participants in the market, as well as regulatory aspects that are not directly related to electronic communications, but still largely affect them and influence the overall experience of using electronic communication services.

Workshops that cover several different topics related to user protection have proven to be a very good indicator of the state of the market, the impact on users and the problems that need to be solved. The workshop will be an opportunity to address the various topics related to end users, including the impact of the DNA.

The workshop will provide an opportunity to bring together regulatory bodies and civil society organisations, especially consumer organisations, to discuss all aspects that can potentially impact European consumers in a rapidly developing digital environment. It will cover the potential effects of consumer-relevant elements such as quality of service, coverage, information, and marketing practices. By engaging in this comprehensive discussion, the workshop seeks to identify actionable insights and policy recommendations or legislative changes, especially taking into account the abovementioned BEREC Opinion under Article 123 EECC and the EC views on the review of Title III of Part III on end-user rights, which can empower consumers and strengthen their position in the digital marketplace.

Deliverable 1: Workshop on end-user rights

Public consultation: No

Timing: workshop to be held in Q2 2027

Deliverable 2: Summary Report of the Workshop on end-user rights

Public consultation: No

Timing: Adoption of the workshop summary report at Plenary 3

⁴⁰ BEREC-BEUC joint workshop on end-user rights, BoR (26) 29_1

4. Strategic priority: Contributing to environmentally sustainable, secure and resilient digital infrastructures

4.1. Combatting fraud

As evidenced in the NIS Cooperation Group's Report of 21 February 2024 on the cybersecurity and resilience of the EU communications infrastructures and networks, there has been a wave of smishing (and vishing) attacks in the last couple of years, which are used by attackers to direct unsuspecting end users to fraudulent websites purporting to be those of government services/shipping companies/retailers, etc., or to target two-factor authentication codes sent via SMS.

BEREC and ECASEC expert group under the umbrella of ENISA were tasked with facilitating the sharing of good practices on preventing smishing, and with preparing guidelines on preventing smishing in 2025. Based on previous work, BEREC plans to continue working on potential measures for combatting fraud more generally as smishing is only one part of the broader issue of online fraud that is growing very fast. The work will include organising meetings, workshops, gathering information and relevant data, as well as the analysis of different legal frameworks, and providing inputs to possible new legislative proposals related to privacy. As part of these initial activities, BEREC will focus on identifying the current status of the matter and the most relevant developments that need to be addressed.

The final result of this work will be a document titled 'Best Practices on Combatting Fraud' developed in cooperation with Europol, ENISA and other partners from both the public and private sphere in Q3 2027 after public consultation in the first half of 2027.

The process will involve the NRAs, electronic communications providers and their associations, equipment vendors and other stakeholders as well as European institutions such as Europol, ENISA, EC and other. ENISA and NIS CG will be consulted in the course of the work.



To feed this work, BEREC organized an external workshop on 21 May 2026. A summary report of these exchanges will be adopted at Plenary 3, 2026. The Best Practices on Combatting Fraud report will be available for public consultation in Q2 2027.

Deliverable: Report on best practices report on Combating Fraud

Public consultation: Yes

Timing: Adoption of draft report for public consultation at Plenary 2, 2027

Adoption of the final and the outcome of the consultation summary reports at Plenary 3, 2027

4.2. Advancing towards environmental data collection and contributing to the code of conduct for the sustainability of telecommunications networks

Since 2020, BEREC has built a growing expertise especially regarding transparency mechanisms and sustainability indicators. Building on its 2023 Report on Sustainability indicators for ECN/ECSs, and its 2024 workshop on telecom regulators' role in this regard and the EC's study on "identifying common indicators for measuring the environmental footprint of electronic communications networks", BEREC has continued its work on sustainability indicators in 2025 by supporting the work of the EC on the Code of Conduct for the sustainability of telecommunications networks. This Code of Conduct was published by the EC's Joint Research Centre (JRC) on January 28, 2026⁴¹.

BEREC will closely follow further developments in the EU Taxonomy with regard to green investments in telecommunication networks as well as the Omnibus Package's proposals to simplify sustainability reporting. It will also take into account the work led by the ITU, and specifically the work of Expert Group on Telecommunications/ICT Indicators (EGTI).

On the basis of the Code of Conduct for the sustainability of telecommunications networks, BEREC will engage with market participants to discuss their experience in implementing the Code of Conduct. The results of its application will inform further development and actions including an assessment of whether further guidance is needed to support its implementation.

As part of this follow-up, BEREC will establish the groundwork for an ad hoc data collection exercise through a questionnaire on the implementation of key sustainability indicators. This activity will support future, harmonized environmental data collection, enable the assessment

⁴¹ [JRC Publications - EU Code of Conduct for the sustainability of telecommunications networks](#)

of the environmental footprint of the ICT sector and contribute to data-driven regulatory decision-making.

Deliverable 1: Questionnaire on advancing towards environmental data collection on ECN/ECS and contributing to code of conduct on ECN/ECS sustainability

Timing: Questionnaire to be distributed in Q3 2027

Deliverable 2: Report on advancing towards environmental data collection on ECN/ECS and contributing to code of conduct on ECN/ECS sustainability

Public Consultation: Yes

Timing: Adoption of draft report for public consultation at Plenary 2, 2028

Adoption of the final and the outcome of the public consultation reports at Plenary 4, 2028

4.3. Sustainable AI for greener digital infrastructures: Understanding the environmental implications of AI in the telecoms and ICT sector

The objective of this project, which was launched in Q1 2026, is to gather factual information on the environmental footprint of AI in relation to electronic communications networks and services (ECN/ECS) and ICTs.

The report will: a) make a state of the art regarding the environmental footprint of AI; b) assess potential efficiency gains and other indirect effects linked to AI deployment, notably for ECN/ECS; c) map the supporting infrastructures required for AI computation relevant to ECN/ECS (e.g., data centers, edge computing, network functions); d) present the environmental indicators recommended by standardisation bodies in relation to AI and e) highlight possible levers within BEREC's remit to encourage sustainable AI towards greener digital infrastructures.

The draft report is planned to be adopted for public consultation in December 2026.

Deliverable: Report on Sustainable AI for greener digital infrastructures: Understanding the environmental implications of AI in the telecoms and ICT sector

Timing: Adoption of the final and the outcome of the public consultation reports at Plenary 2, 2027

4.4. Reinforcing EU's resilience capabilities

The security and resilience of electronic communication networks and services is of paramount importance to the well-functioning Digital Single Market. The single market needs clear legal frameworks so that only one set of rules applies for a given matter. There must be



a clear distinction between which obligations are imposed on operators, under which legal framework, and which authority is responsible for enforcement.

In some countries, solutions whereby the NIS authority takes on horizontal responsibility for security across all sectors covered by the NIS framework have occurred, while sector-specific mandates remain within the competence of sector regulators (NRAs) with a long-standing role and proven experience in a particular sector. Given that telecoms regulators (NRAs) possess specific knowledge about technology and market developments in the sector, their continued involvement in issues related to security and resilience must be ensured. Different models may be used across the EU but the essential involvement of NRAs should be guaranteed. BEREC will explore the potential role of NRAs with respect to the resilience of electronic communications networks.

The data collected by BEREC will be available for analysis in the second half of 2026, while the adoption of the report for the public consultation is foreseen in Q2 2027. Final report should be finalised in Q3 2027.

Deliverable: BEREC Report on Best practices for Resilience

Timing: Adoption of the draft report for public consultation Plenary 2, 2027.

Adoption of the final Report on Best practices the outcome of the public consultation report at Plenary 3, 2027.

4.5. Workshop on IPv6 deployment

In 2021, BEREC organized a public technical workshop on IPv6 deployment across Europe⁴². The main objective of this workshop was to share experiences and best practices on the actions taken to facilitate IPv6 deployment at the national level and to debate on how different actors can be motivated to deploy IPv6. With this workshop, BEREC also aimed to provide concrete ideas and tools to facilitate this work at the national level, to share information and to motivate the actors to take the necessary steps that will ensure the Internet continues to function as an engine of innovation and future growth. In order to obtain updated information, raise awareness, understand the current IPv6 traffic volumes and foster the migration process, BEREC will organize another workshop in 2027.

This workshop aims to gather relevant stakeholders to collect data insights and best practices in deploying IPv6 and Resource Public Key Infrastructure (RPKI) for enhanced network

42

<https://www.berec.europa.eu/en/events/berec-events-2021/berec-public-technical-workshop-on-ipv6-deployment-across-europe>

scalability and security. Issues to discuss may include: IPv6 deployment progress/plans of European ISP's, Strategy and advisories on how IPv6 deployment can be performed.

Deliverable 1: Workshop on IPv6 deployment

Timing: Q3/2027

5. Strategic priority: Strengthening BEREC's capabilities and continuous improvement

5.1. Monitoring and supporting data-driven regulation

5.1.1. Connectivity and competition monitor: market snapshots

Based on an identified need in the market, BEREC will develop a statistical report providing a overview of the market situation of the electronic communications sector for BEREC members individually.

The market snapshot will be based on data available at the end of 2026 and will include the number and names of the main operators active, their market shares (where available) or a qualitative characterization of their market position, and their field of activity and business model, including the markets in which they provide networks/services.

Possible extension

Subject to data availability and resource considerations, BEREC may complement the market snapshot with a selected set of connectivity, competition and market indicators, chosen on the basis, inter alia, of their policy relevance, data quality or comparability. For instance, BEREC could consider reintroducing indicators that are no longer published by the EC but remain valuable for NRAs or stakeholders in assessing market developments.

Such an extension could provide a common reference point for discussions on market developments, investment trends, competition dynamics and connectivity outcomes across Europe. By bringing together information that is often dispersed across multiple sources, BEREC will facilitate evidence-based policy discussions and improve transparency regarding the state of electronic communications markets.



Subject to stakeholder interest and evaluation of the utility of this exercise, BEREC could further consider transforming this report into a recurring statistical publication, allowing market developments to be monitored over time.

Deliverable: BEREC Report on Connectivity and Competition Monitor

Public consultation: Yes

Adoption of the draft report at Plenary 3 2027

Adoption of the final report at Plenary 2 2028

5.1.2.33rd International Roaming benchmark data and monitoring report

According to the Roaming Regulation⁴³, BEREC shall collect data regularly from NRAs regarding the implementation of the Roaming Regulation. The data to be collected by BEREC are to be notified to the EC once a year. On the basis of the data collected, BEREC also has to report regularly on the evolution of pricing and consumption patterns in the Member States, both for domestic and roaming services, the evolution of actual wholesale roaming rates for balanced and unbalanced traffic and the relationship between retail prices, wholesale charges and wholesale costs for roaming services. BEREC will assess how closely those elements relate to each other.

The Roaming Regulation mandates the production of one BEREC report including the information that was previously reported by the two BEREC roaming benchmark data reports and the BEREC transparency and comparability report, as well as additional indicators.

The data collection for the 33rd Report was launched at the end of September 2026. The data will be submitted by NRAs to the BEREC Office by mid-November. After analysing the data, the report will be drafted and will be adopted in Plenary 1, 2027.

The BEREC Roaming Data Report will include an Annex reporting on the evolution of roaming prices and volumes for the Western Balkan region.

Deliverable: 33rd BEREC international Roaming Benchmark Data Report

Public consultation: No

Timing: Adoption of the final report at Plenary 1, 2027, for publication

5.1.3.8th Intra-EU communications Benchmark Report

According to Article 5a (6) of the OIR, NRAs should monitor the price developments of regulated intra-EU communications services. For this purpose, BEREC provides a template

⁴³ Regulation (EU) 2022/612 on roaming on public mobile communications networks within the Union

to contribute to harmonised data collection in the EU/EEA. NRAs collect data from both fixed and mobile operators on a yearly basis and submit the data to BEREC.

In 2027, BEREC is planning to publish the 8th Benchmark Report on the findings of the data collection. BEREC will launch the data collection for this report in March with a deadline for NRAs to forward the data to the BEREC Office in mid-May. After analysing the data, a report will be drafted, to be adopted and published in Plenary 3, 2027. Using collected data, BEREC will also publish an annex to the report, along with the updated BEREC benchmarking for the derogation assessments.

Deliverable: 8th Intra-EU communications Benchmark Report

Public consultation: No

Timing: Adoption of the final report at Plenary 3, 2027, for publication

5.1.4. Fostering coordination and efficient data gathering for digital markets

BEREC's tasks include promoting the modernisation, coordination and standardisation of the collection of data by NRAs. In the European electronic communications sector, data-driven regulation has been key in informing policies and decisions to foster competition, enhance consumer welfare and contribute to more effective regulatory frameworks. As regulation evolves, policymakers' data also needs to evolve, ensuring alignment with emerging governance models, transparency requirements, and accountability frameworks.

BEREC will assess how better alignment of data collection practices across Member States (i.e. by the development of common methodological standards and peer-review exchanges on data enforcement practices), combined with technological modernisation, can materially reduce reporting burdens while improving data quality and an aid in identifying the possible need for updates of indicators.

Deliverable: Cooperation on data collection practices (TBD, e.g. opinions, workshops, knowledge-building, reports, etc.)

Timing: throughout the year

5.1.5. WACC parameters' calculation according to the EC Notice

Following publication of the EC's Notice on the WACC, BEREC is tasked with the calculation of various parameters of the WACC formula according to the prescribed methodology.

In 2027, BEREC will continue to perform the annual calculation of the WACC parameters, as initiated in 2020. These parameters will be calculated at the beginning of the year and published in a separate report to allow the NRAs to base their national WACC decisions on

this up-to-date information. BEREC will also select the companies which will be eligible for the peer group.

Deliverable: Report on WACC parameters 2027

Public consultation: No

Timing: Adoption at Plenary 2, 2027 for publication

5.1.6. Report on regulatory accounting in practice

The Regulatory Accounting in Practice Report 2027 will provide an up-to-date factual overview of the regulatory accounting frameworks used in Europe and an assessment of the level of consistency achieved by NRAs. A report is prepared annually and brings up to date the previous versions which have been published on an annual basis since 2005. In 2027, emphasis will continue to be placed on consistency in regulatory accounting with respect to key access products (e.g. fibre optic) and the report will be streamlined in terms of access products considered (for instance, by reviewing the relevance of indicators and parameters covered) while retaining the in-depth analysis of methods used to identify commonalities and the reasons for differences. Given the applicability of the EC's WACC Notice of 2019, there will be an investigation into to what extent the methodology and input parameters used to calculate the rate of return on capital employed are calculated by single NRAs. The impact of such analysis will also be examined.

The report will also take into account the list of relevant markets susceptible to ex ante regulation pursuant to the RRM.

The report will develop a more focused analysis that concentrates on the following key wholesale markets: Wholesale Local Access (Market 3a/2014, now Market 1/2020), Wholesale High Quality Access (Market 4/2014, now Market 2/2020) and Wholesale Central Access (Market 3b/2014, no longer in the list of relevant markets susceptible to ex ante regulation). For these markets, it will describe the regulations applied by NRAs and it will contain a comparison of the most popular combinations of cost base and cost allocation methodologies.

It will also take stock of how NRAs applied the Gigabit Recommendation.

BEREC will evaluate how the Report on WACC parameters 2027 provides evidence for the WACC calculation practices among NRAs, given the applicability of the WACC Notice.

Depending on the result of the evaluation, the collection and analysis of data on the current calculation of the weighted average cost of capital (WACC) may be updated. It will include



data on whether and how NRAs account for the higher risk of investing in VHCNs (for example, through the application of a risk premium which is to be added to the calculated WACC).

Deliverable: Regulatory Accounting in Practice Report 2027

Public consultation: No

Timing: Adoption of the final report at Plenary 4, 2027, for publication

5.1.7. Annual Reports

According to the BEREC Regulation, BEREC must provide its annual activity report to the European Parliament, the Council, the EC and the European Economic and Social Committee by 15 June of the year after the year reported on in the annual activity report. BEREC must report annually on technical matters within its competence, in particular on market developments in the electronic communications sector.

BEREC will continue to publish its annual report on its activities and an annual report on developments in the sector as part of a single document. The annual report on BEREC activities focuses on the outcome of the work of BEREC based on the relevant work programme, whereas the annual report on developments in the electronic communications sector summarises BEREC's view of the past year and provides an outlook on challenges in the sector.

Deliverable: Annual report on market developments in the electronic communications sector and BEREC activities

Public consultation: No

Timing: Adoption of the report at Plenary 2 2027

5.2. Planning and communication

5.2.1. Work Programme 2028

The BEREC Regulation sets out a process for configuring the Annual Work Programme. According to the Regulation, the Board of Regulators shall adopt the outline of its annual work programme by 31 January of the year preceding that to which the annual work programme relates. After consulting the European Parliament, the Council, and the EC on their priorities, as well as consulting other interested parties, the Board of Regulators shall adopt the final annual work programme by 31 December 2027. The Board of Regulators shall transmit the annual work programme to the European Parliament, the Council, and the EC as soon as it is adopted.



BEREC will publish a Work Programme outline by the end of January 2027 and will then work to finalise the 2028 Work Programme taking into account stakeholders' input by the end of the year.

Deliverable 1: Outline of the draft Work Programme 2027

Public consultation: No

Timing: Adoption by 31 January 2027

Deliverable: Work Programme 2028

Call for inputs: Q1/2027

Public consultation: Yes

Timing: Adoption of the draft Work Programme 2028 for public consultation at Plenary 3, 2027

Adoption of the final Work Programme 2028 and the outcome of the public consultation report at Plenary 4, 2027, for publication.

5.2.2. Public debriefings

BEREC will host public debriefings after each ordinary meeting to ensure transparency and engage with stakeholders. These events provide an opportunity to present BEREC's work outcomes, launch public consultations, address stakeholder inquiries, and share information about upcoming events. The debriefings will be livestreamed on the BEREC website, LinkedIn and YouTube.

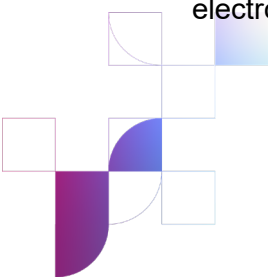
Deliverable: Organization of public debriefings

Timing: The week after each BEREC ordinary Plenary meetings

5.2.3. 15th Stakeholder Forum

For fifteen years, the BEREC Stakeholder Forum has provided a key platform for open and timely exchanges between BEREC and stakeholders on regulatory developments, market trends, and BEREC's strategic priorities and future work.

As BEREC's flagship annual public event, the Forum also offers valuable opportunities for direct engagement between stakeholders and BEREC Working Group Co-chairs through dedicated "Meet & Greet" sessions. These informal exchanges facilitate constructive dialogue on emerging challenges, market developments, and practical regulatory issues affecting the electronic communications sector. The feedback gathered during the Forum continues to



provide important input for shaping BEREC's future activities, priorities, and work streams, while also contributing to a better understanding of BEREC's role and ongoing initiatives.

Complementing the technical discussions, a high-level conference will also be organised, bringing together senior institutional representatives, policymakers, industry leaders, and experts to exchange views on the strategic direction of Europe's digital ecosystem and connectivity landscape.

Deliverable: 15th Stakeholder Forum

Timing: February/March 2027

6. Institutional and international cooperation

Cooperation with EU institutions and international organisations is increasingly relevant for addressing challenges in the digital markets. In line with its mandate under Article 35 of the BEREC Regulation, institutional and international relations are aligned with the EU's external relations policy and strategic priorities and an integral part of BEREC annual work programme. BEREC has developed a Medium-Term Strategy for international and institutional cooperation, which both are now part of the BEREC Strategy.

6.1. Assignment of radio spectrum rights peer review forum

Article 35 of the EECC establishes a peer review process to assess draft measures for the assignment of radio spectrum rights following art 55.2 EECC. The RSPG is responsible for organizing these meetings, which are also open to the participation by experts from BEREC.

BEREC and the Radio Spectrum Policy Group (RSPG⁴⁴) agreed on working arrangements⁴⁵ on 13 June 2019. These set out the cooperation methods for the purpose of BEREC's participation in the Peer Review Forum in accordance with the requirements of Article 35 of the EECC. The cooperation methods include:

- a. using the Peer Review Forum as an instrument of peer-learning;
- b. promoting the benefits of the Peer Review Forum since it convenes national NRAs and other competent authorities with expertise on comparative or competitive selection procedures in the regulatory framework of electronic communications;
- c. cooperating on the implementation of the Peer Review Forum; and
- d. appointing 'liaison officers' in both BEREC and the RSPG so as to strengthen the relationship between the two bodies and facilitate the implementation of this

⁴⁴ https://radio-spectrum-policy-group.ec.europa.eu/index_en

⁴⁵ BoR (19) 100

arrangement; the Wireless Network Evolution Working Group Co-Chairs are BEREC's 'liaison officers'.

BEREC's participation in the Peer Review Forum contributes to the objective of promoting full connectivity through discussions with the RSPG about the market-shaping aspects of spectrum assignment. The Peer Review Forum is convened by the RSPG when required.

In addition to activities as part of the Peer Review Forum, BEREC members are prepared engage with the RSPG and European institutions on topics of mutual interest, including on any policy initiatives or legislative proposals of the EC.

Deliverable: participation in the assignment of radio spectrum rights peer review forum

Timing: when convened by RSPG

6.2. International Summit 2027

The biennial quadrilateral summit between BEREC, EMERG, Regutel and EaPeReg, hosted within the European Union, will convene the leading networks of electronic communications regulators. The forum is designed to foster the exchange of best practices and enable a forward-looking dialogue on shared priorities and emerging challenges in a sector that is progressively globalised and deeply interconnected.

Against this backdrop, the Summit will serve as a strategic platform to reinforce regulatory convergence, enhance institutional cooperation, and align approaches to key policy areas such as connectivity, market dynamics, and digital transformation. By strengthening cross-regional coordination, the initiative aims to contribute to more coherent and resilient regulatory frameworks, capable of supporting innovation, investment, and consumer trust in an evolving digital ecosystem.

Deliverable: Regulators International Summit 2027

Timing: March 2027

6.3. Ad hoc international and institutional activities

In an increasingly global and interconnected digital ecosystem, BEREC will continue to strengthen its external engagement by fostering structured dialogue and cooperation with relevant institutional and regulatory counterparts, both within and beyond the EU framework. This includes reinforcing coordination on key policy domains such as spectrum management, cybersecurity, digital markets, sustainability, and emerging infrastructures. In parallel, BEREC will further enhance its contribution to the consistent implementation of EU legislation, promote regulatory convergence, and support the development of harmonised data and indicators, thereby underpinning evidence-based and future-proof decision-making.



At international level, BEREC will consolidate its role as a strategic partner in the global regulatory landscape by deepening exchanges on cross-border issues, technological evolution, and shifting market dynamics. This engagement will remain closely aligned with EU external priorities, providing targeted expertise to support international initiatives and regional integration efforts, notably in areas such as connectivity and roaming. Through sustained cooperation and forward-looking partnerships, BEREC aims to amplify its global outreach, facilitate knowledge transfer, and contribute to more coherent, resilient and innovation-friendly regulatory frameworks worldwide.

In this context, BEREC will cooperate and respond to any request from other European and international institutions within the framework of the BEREC Strategy and the different MoUs signed with BEREC counterparts.

Deliverable: Relations with other institutions and international cooperation (e.g. organisation of joint meetings, summits or Workshops).

Timing: As required and agreed with BEREC's counterparts.

7. Potential BEREC work for 2028 and beyond

Given the number of workstreams selected for the Work Programme 2027, it was not possible to include several of the interesting proposals received. In order not to lose track of these potential workstreams, this section includes items which BEREC may include in the Work Programme 2028 and beyond. The list of items mentioned below is therefore for information purposes only and should not be regarded as final.

7.1. Digital Network Act implementation

The draft DNA envisages over 15 deliverables (e.g. guidelines, templates, databases) that BEREC will have to deliver within 6 or 12 months of the entry into force of this new Regulation.

According to the current draft, the tasks that BEREC will have to deliver within 6 months include a common template to collect information to support the Union Preparedness Plan, the review of its rules of procedure and the guidelines on general authorisation conditions. Some other examples of the duties that BEREC will have to fulfil within 12 months include the adoption of the Union Preparedness Plan for Digital Infrastructures, guidelines for the consistent application of market shaping measures, on switching and number porting processes or on protection against fraudulent use of numbering resources.

The legislators' review of the EC proposal will determine if these tasks will eventually be included in the Regulation and if others will be added. Along 2027, BEREC will follow these developments as a source for BEREC's future work.



7.2. Report on the cloud and data markets in Europe

According to Article 37(4)(b) of the Data Act, independent national competent authorities with experience in electronic communications services are considered to be well-placed to ensure the implementation and enforcement of the provisions concerning switching between data processing services and interoperability (Chapters VI and VIII). These authorities are typically BEREC members: the majority of them have either already been designated as the national competent authority or are likely to be designated soon.

Against this backdrop, BEREC has published several documents on this matter: BEREC response to the EC's Digital Fitness Check with a focus on cloud-related provisions under the Data Act⁴⁶, the BEREC Report on Cloud and Edge Computing Services⁴⁷ or the external study on data centers⁴⁸, among others.

In order to continue supporting the Data Act implementation, BEREC envisages a Report on the cloud and data markets in Europe to assess latest developments after the entry into force of this regulation.

7.3. Report on wireless network evolution in the 6G era

BEREC is interested in exploring different wireless connectivity scenarios in the 6G-era. The study would set out and describe some hypothetical scenarios where different models drive 6G connectivity in Europe. Among other topics, it would consider impacts and trends such as a) the phaseout of older technology generations and fallback options; b) distinction between indoor and outdoor connectivity and geographic and population coverage; c) deployment of private networks and neutral hosting; d) structural possibilities arising from network virtualization and network layer access-as-a-service or spectrum-as-a-service; e) developments in the deployment of non-terrestrial networks and heterogeneous networks; f) the role of service and technology neutrality and compatibility with tech sovereignty.

The study should inform BEREC in advance of various impacts and trends on wireless connectivity, potentially preparing an own issue analysis, which may be consulted on in subsequent years. For example, BEREC may wish to contemplate how the 6G-era might demand new thinking on roaming, MVNOs, number based and number-independent services, interoperability of services, and associated infrastructures. In addition, in a scenario where the traditional vertically integrated telecoms operator is fully de-layered into a stack of open access layers, perhaps under network function exposures and open Application Programme Interfaces (APIs), BEREC may wish to hypothesise on market competition within and between such layers.

⁴⁶ BoR (26) 23_1

⁴⁷ BoR (24) 136

⁴⁸ BoR (26) 01

7.4. Report on hybrid networks (Wifi/IMT interworking)

In 2026, BEREC organized exchanges on the developments in hybrid or heterogeneous networks, considering the increasing interworking and interrelations between different types of satellite, mobile and RLAN networks. Also, the interplay between RLAN and mobile networks in the context of enhancing indoor coverage, competition and collaboration issues and how hybrid networking will change dynamics of aspects such as coverage, roaming, (wholesale) access and legal interception are important issues. Those exchanges are planned to continue in 2027.

Following these exchanges, BEREC could explore the technical possibilities of interaction between WIFI and mobile networks, as well as the obstacles (e.g. OS), and regulatory actions that might follow.

7.5. Guidance on on market analysis under the revised regulatory framework

BEREC may assess the need of guidance for NRAs on how to apply the new framework regarding market analyses including changes triggered by a possible new RRM, coupled with the DNA proposals targeted at the market analysis process. BEREC could develop on relevant aspects in the transitory period, foreseen impact in the case of markets that are now included in the RRM and would not be included in the new version, timeline of market analyses, burden of proof and the three criteria test, considerations on remedies hierarchy and other procedural aspects in need for clarification, depending on the EC's outcome in its review process.

7.6. Report on technical and market trends and regulatory challenges of eSIM provisioning

GSMA SGP.32 is the latest eSIM standard designed for remote SIM provisioning (RSP) in IoT devices, enabling secure and efficient management of SIM profiles without physical access to the device. The specification addresses the needs of large-scale IoT deployments, particularly for devices that are network-constrained, battery-powered, or lack a user interface.

This study will explore: a) remote SIM provisioning capabilities, enabling IoT devices to download, enable, disable, or delete operator profiles over-the-air without replacing physical SIM cards; b) lightweight communication protocols, such as CoAP/UDP with DTLS 1.3, designed to reduce power consumption and bandwidth usage compared to traditional SMS or HTTPS-based approaches; c) key architectural components, including the IoT Profile Assistant (IPA) on the device and the eSIM IoT Manager (eIM) for centralized lifecycle management of SIM profiles; d) secure profile preparation and delivery through SM-DP+ (Subscription Manager – Data Preparation); e) operational workflows for remote profile lifecycle management, including profile download, activation, deactivation, and deletion; f) scalability and fleet management capabilities, enabling enterprises to manage thousands or millions of IoT devices remotely; g) security mechanisms, including strong encryption, certificate-based authentication, and compliance with GSMA security standards; h) market

and operational advantages, such as avoiding vendor lock-in, enabling operator switching, supporting compliance with permanent roaming restrictions, and reducing operational costs by eliminating manual SIM replacement.

