

The Consumer Voice in Europe

## BEREC 2024 WORK PROGRAMME CONSULTATION

BEUC response



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## Why it matters to consumers

The technical expertise and experience of the Body of European Regulators for Electronic Communications (BEREC) is very important to promote competitive electronic communications markets and to protect and empower consumers. Being able to comment on BEREC's draft programme shows regulators' openness and willingness to cooperate with consumer organisations which BEUC welcomes.

## Summary

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*BEUC welcomes the opportunity to comment on the Body of European Regulators for Electronic Communications (BEREC)'s draft 2024 work programme.<sup>1</sup>*

*BEUC particularly welcomes the following elements in the work programme:*

- *recognition of consumer protection and universal service as essential horizontal principles;*
- *commitment to deliver on full connectivity and further work on 5G, and discussions on alternative connectivity solutions;*
- *overall work on net neutrality and focus on enforcement following the review of the Guidelines on the implementation of the Open Internet Regulation;*
- *commitment to further analysis of sustainability policies;*
- *review of the application of end-users' rights and overall work on ensuring the consistent implementation of the EECC;*
- *assessment of the IP interconnection ecosystem and its end-users;*
- *planned out-of-silos interinstitutional cooperation.*

*BEUC recommends BEREC to:*

- *extend its activities to foster consumer protection and empower consumers;*
- *ensure focus on its mandate priorities, especially highly important work streams related to protection and empowerment of consumers, as well as competition;*
- *pursue the objective of full connectivity hand-in-hand with the principles of open competition and consumer protection;*
- *ensure effective and coherent regulatory approaches by National Regulatory Authorities (NRAs) ahead of the adoption of the Gigabit Recommendation;*
- *continue organising the joint workshop with BEUC on application of rights of end-users in the EECC;*
- *enlarge the scope of its work on 5G, by putting more emphasis on how affordable and accessible connectivity can deliver benefits for all consumers;*
- *enlarge the scope of its work on net neutrality, by assessing how a possible regulatory intervention on the telecoms market stands to affect consumers;*
- *complement and clarify its preliminary assessment on the possible introduction of "network fees" payments from large online platforms to internet service providers;*
- *improve consultation procedures by extending timeframes and avoiding simultaneous consultations.*

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<sup>1</sup> Draft BEREC 2024 Work Programme, available at [https://www.berec.europa.eu/system/files/2023-10/Draft%20BEREC%20Work%20Programme%202024\\_PC.pdf](https://www.berec.europa.eu/system/files/2023-10/Draft%20BEREC%20Work%20Programme%202024_PC.pdf)

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## 1. General comments

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BEUC welcomes that BEREC considers “**universal service and consumer protection**” as “important horizontal principles that form an essential part of the high-level priorities.”<sup>2</sup> However, in line with our suggestion made for the BEREC Work Programme 2023, we must again point out that the commitment should be fully reflected in work programme activities.

BEREC points out that, for three consecutive years, “[g]iven the number of workstreams selected for the Work Programme 2024 and BEREC priorities, it was not possible to include several proposals.”<sup>3</sup> As already pointed out in our response in 2021<sup>4</sup>, BEUC would like to stress that the increasing amount of workstreams should not reduce BEREC’s focus on its key tasks, especially those related to consumer protection.

## 2. Promoting full connectivity: comments on strategic priority 1 items

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BEUC welcomes the continuation of BEREC’s commitment to **full connectivity for consumers and businesses alike** as a strategic priority for 2024. Although we support the commitment to facilitate the roll-out of very high-capacity networks (VHCNs) as a contribution to help addressing the digital divide<sup>5</sup>, BEUC would strongly recommend BEREC and the national regulatory authorities (NRAs) prudence when it comes to promoting VHCNs towards meeting the 2030 Digital Decade connectivity targets.

In principle, BEUC supports the objective of bridging the digital divide by investing in the development of network infrastructure to enable the provision of accessible and affordable high quality bandwidth connectivity to all consumers, especially those more vulnerable. However, we would like to stress that pursuing the **objective of full connectivity must always be in line with the principles of open competition, a level-playing-field internal market and the safeguard of end user interests**.

We therefore echo **BEREC’s concern in addressing specific questions**, by means of reports or dedicated workshops, related to the upcoming European Commission’s proposed “Recommendation on the Regulatory Promotion of Gigabit Connectivity” (**Gigabit Recommendation**)<sup>6</sup>, expected to be in place by 2024 (e.g. workshops on ex ante regulatory experience concerning commitments, wholesale-only undertakings and commercial agreements review; report on design, enforcement and monitoring of remedies in subnational markets with multiple SMP operators; managing copper network switch-off).

In this context, we would like to recall our **concerns<sup>7</sup> regarding problematic provisions of the draft Gigabit Recommendation**. BEUC fully shares the concerns contained in the BEREC Opinion on the Gigabit Recommendation of 5 May 2023 that certain provisions of the draft Recommendation “do not seem to be entirely in line with the provisions of the Code”, having been found to either “go beyond” or to be “incompatible” with the EECC.<sup>8</sup>

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<sup>2</sup> Draft BEREC 2024 Work Programme, page 7.

<sup>3</sup> Ibid, page 48.

<sup>4</sup> BEUC response to BEREC 2022 Work Programme, page 2. <https://www.beuc.eu/position-papers/berecs-2022-work-programme-consultation-beuc-response>

<sup>5</sup> Draft BEREC 2024 Work Programme, page 4.

<sup>6</sup> Draft Recommendation on the Regulatory Promotion of Gigabit Connectivity: <https://digital-strategy.ec.europa.eu/en/library/gigabit-connectivity-recommendation>

<sup>7</sup> BEUC letter to Ms Renate Nikolay, Deputy Director-General, DG CNECT, European Commission, 30 May 2023: [https://www.beuc.eu/sites/default/files/publications/BEUC-X-2023-066\\_BEUCs\\_views\\_on\\_the\\_Commissions\\_draft\\_Gigabit\\_Recommendation.pdf](https://www.beuc.eu/sites/default/files/publications/BEUC-X-2023-066_BEUCs_views_on_the_Commissions_draft_Gigabit_Recommendation.pdf)

<sup>8</sup> BEREC Opinion on draft Gigabit Recommendation, 5 May 2023: <https://www.berec.europa.eu/en/document-categories/berec/opinions/berec-opinion-on-the-draft-gigabit-recommendation>

As rightly pointed out by BEREC in a recent opinion<sup>9</sup>, the deployment of network infrastructure to achieve a **better and high-quality connectivity for all consumers must go together with promoting competition and consumer protection**. We therefore welcome the overall intention to prepare NRAs for potential future challenges related to the Gigabit Recommendation and to contribute to effective and coherent regulatory approaches ahead of its adoption. In order to prevent potential negative consequences for consumers, the implementation of relevant EEC provisions must be carefully monitored and enforced.

**We recall that full connectivity does not automatically mean a better connectivity.** The majority of consumer complaints relate not to the absence of connectivity, but to the poor overall quality of service provided. Over the last few years, **several BEUC member organisations have voiced their concerns** regarding the **lack of transparency and poor quality of service** provided by telecom operators. The consumer complaints received by these organisations often concern the **deployment and marketing of offers of fibre or 5G**. Our members also identified multiple disparities across Member States between advertised offers and the actual service provided: from several examples of gaps in coverage in Germany<sup>10</sup>, to lack of transparency by operators regarding the quality of service offered in France<sup>11</sup> and Belgium<sup>12</sup> or even the lack of compatibility of devices which are marketed as '5G-compatible' in Spain.<sup>13</sup>

The objective of **full connectivity must also work for consumers, not only operators**. Consumers, including those most vulnerable, should be allowed to take full advantage of digital opportunities. The improvement of network infrastructure, with the rollout of new technologies such as 5G, stands out as a unique opportunity to improve accessibility and better quality of service. We therefore urge BEREC to prioritise these consumer-relevant elements such as quality of service, coverage, information, and marketing practices.

In this context, BEUC **welcomes the planned report on the evolution of private and public 5G networks in Europe**, and recommends that BEREC continues monitoring developments, addresses misleading practices and ensures the proper development of 5G for all consumers. BEUC would like to recall its **previous suggestion<sup>14</sup> for a workshop on 5G for consumers**. This workshop would be an opportunity to bring together regulatory bodies and civil society organisations, including consumer organisations, to discuss all aspects that can potentially impact European consumers. This would build on the discussion already started during the recent BEREC workshop on the Internet of Things.<sup>15</sup> Such a workshop would be fitting for BEREC's strategic priorities to promote full connectivity, to empower end-users, and to foster a higher level of consumer protection.

We also welcome the planned **progress report on managing copper network switch-off**.<sup>16</sup> We call on BEREC to engage with all relevant stakeholders, including consumer organisations, to determine and anticipate the impacts of this technological shift on consumers, particularly those most vulnerable (for example, those living in more remote areas).

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<sup>9</sup> Ibid, page 2.

<sup>10</sup> See, for example: <https://www.vzbv.de/pressemitteilung/mehr-wettbewerb-fuer-den-mobilfunkmarkt>

<sup>11</sup> See, notably: <https://www.quechoisir.org/billet-du-president-cartes-de-couverture-5g-le-contestable-laisser-faire-de-l-arcep-n83995/>; <https://www.quechoisir.org/decryptage-telephonie-mobile-ce-qu-il-faut-savoir-sur-la-5g-n82595/>

<sup>12</sup> See, for example: <https://www.test-achats.be/hightech/telecom/news/proximus-5g-light>

<sup>13</sup> See, notably: <https://www.ocu.org/tecnologia/internet-telefonía/informe/tecnología-5g>

<sup>14</sup> BEUC response to BEREC 2023 Work Programme, page 4.

<sup>15</sup> BEREC Workshop on Internet of Things: <https://www.berec.europa.eu/en/events/berec-events-2023/berec-workshop-on-internet-of-things-perspectives-and-competition>

<sup>16</sup> Draft BEREC 2024 Work Programme, pages 11-12.

Finally, we welcome BEREC's intention to continue its work on **the role of satellite technologies in mobile communications**. Holding another **external workshop** would allow a continuation of the discussion to determine how this new technology can become an integral part of European connectivity and provide affordable, high-quality connections to consumers in remote locations where terrestrial networks are unable to reach.<sup>17</sup>

### 3. Thriving sustainable and open digital markets: comments on strategic priority 2 items

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BEUC strongly welcomes the **work of BEREC on net neutrality and supports its efforts** to ensure an **open and non-discriminatory internet for all consumers**. However, we regret that a clear stance from previous work programmes, mentioning that the open internet is "an important building block in the current EU telecom rules"<sup>18</sup>, has been left out of the current draft.

We welcome **BEREC's commitment to the implementation of the Open Internet Regulation and the BEREC Open Internet Guidelines** and its emphasis on supporting the "NRAs' obligation to 'closely monitor and ensure compliance' with the Regulation"<sup>19</sup>, including on cases related to zero-rating. BEUC would like to recall that this problem was previously highlighted in the past and welcomes BEREC's efforts to step up enforcement, offering support to NRAs whenever needed.<sup>20</sup> We welcome the intention to hold a discussion forum and the possibility for continued activities such as workshops, surveys, and questionnaires, including the planned internal workshop on the use of DNS-blocking.

We would especially highlight the importance of BEREC's assessment work **of the IP interconnection ecosystem** and its translation into an **upcoming report**. BEUC very much appreciates BEREC's invitation to contribute to the dedicated workshop on this issue in September 2023, and welcomes BEREC's openness to hold further surveys or workshops.

BEUC strongly welcomes **BEREC's active contribution** to the discussion on the **impact of potential "network fees" measures on the Internet ecosystem and on end-users**. We encourage BEREC to **continue this valuable engagement** given the growing possibility of an upcoming regulatory intervention on the telecoms market, coinciding with calls from operators to deregulate and concentrate the market. It is **fundamental that BEREC provides a clear and independent analysis** on the potential impacts of such a regulatory intervention, with a special focus on end-users/consumers.

Already back in September 2022, **BEUC reiterated in its preliminary position** that the potential introduction of such measures could have detrimental impacts on competition, on the EU internal market and on consumers' interests. BEUC stressed that it should be up to BEREC and its independent expertise to determine the existence of any market failure and ultimately assess the necessity of any regulatory intervention.<sup>21</sup> On 12 October 2022, **BEREC issued its preliminary assessment** on a possible introduction of payments from large online platforms to Internet Service Providers (ISPs), having found "no evidence" that an actual problem or market failure exists in the electronic communications sector.<sup>22</sup>

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<sup>17</sup> Ibid, pages 17-18.

<sup>18</sup> BEREC 2023 Work Programme, page 18.

<sup>19</sup> Draft BEREC 2024 Work Programme, page 20.

<sup>20</sup> BEUC response to BEREC Public Consultation on Draft Updated Net Neutrality Guidelines, pages 9-10: [https://www.beuc.eu/publications/beuc-x-2019-075\\_berecs\\_public\\_consultation\\_on\\_its\\_draft\\_updated\\_net\\_neutrality\\_guidelines.pdf](https://www.beuc.eu/publications/beuc-x-2019-075_berecs_public_consultation_on_its_draft_updated_net_neutrality_guidelines.pdf),

<sup>21</sup> BEUC position on possible introduction of network fees: [https://www.beuc.eu/sites/default/files/2022-09/BEUC-X-2022-096\\_Connectivity\\_Infrastructure-and-the\\_open\\_internet.pdf](https://www.beuc.eu/sites/default/files/2022-09/BEUC-X-2022-096_Connectivity_Infrastructure-and-the_open_internet.pdf)

<sup>22</sup> BEREC preliminary assessment of the underlying assumptions of payments from large CAPs to ISPs, pp 6-7:

We therefore welcome BEREC's intention to further contribute to this debate by providing clarification and insight on how the current electronic communications regulatory framework applies to this reality and how the dynamics of competition and/or of cooperation work between these market players. The new **report on the entry of large content and application providers into the markets for electronic communications networks and services will be a useful addition.**<sup>23</sup> BEUC remains at BEREC's disposal to engage in a constructive dialogue on this important issue for consumers.

**BEREC's contribution to the implementation of the Data Act**<sup>24</sup> to ensure coherence and effective complementarity in the implementation of the Data Act is also welcome. In addition, we also welcome the intention to **hold an internal workshop on the practical implementation of the Digital Services Act.**<sup>25</sup> We reiterate our availability to engage with BEREC in further discussions on these matters.

#### 4. Empowering end-users: comments on strategic priority 3 items

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BEUC welcomes that BEREC considers the **strengthening of end user empowerment as a strategic priority.** However, we recommend caution regarding the growing number of workstreams in the BEREC work programme, underlining the importance that BEREC continues to prioritise its work on the most relevant workstreams for end-users.

Looking ahead, BEUC reiterates the importance that **BEREC develop a coherent vision and strategy** to ensure that the electronic communications sector **works for consumers.** We welcome the recognition that there is an **"important role for regulators to play" for consumers.** However, this role should not be limited to simply ensuring "transparency for consumers, increasing and maintaining consumer awareness and further improving digital skills."<sup>26</sup> **The goal of empowering consumers simply cannot be achieved with more transparency and digital skills alone.**

BEUC encourages BEREC to strongly support NRAs in their role to **ensure the respect of all consumer rights and related provider obligations** in the electronic communications sector and to continue its work on how to **bridge the digital divide.** We encourage BEREC to **further involve relevant stakeholders,** such as consumer organisations and other civil society organisations, and allow them to engage more actively with NRAs on key topics for consumers.

BEUC is looking forward to working closely with BEREC regarding the **review on end-user rights following Article 123 of the EECC.** Given the experience of Member States struggling to transpose this legislation, it is critical that the consistent implementation of the EECC continues to be at the forefront of BEREC's work. We therefore welcome BEREC's planned workstream towards issuing its **Opinion on Article 123 of the EECC.** Although we regret that this opinion will not be open for public consultation, we welcome BEREC's openness to conduct studies, workshops and exchanges. **We especially welcome the intention to hold an external workshop** with BEUC, representatives of Member States, operators and other relevant stakeholders. In particular, the announced focus of the discussion on **switching and termination of contracts** is very important for consumers.

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<https://www.berec.europa.eu/en/document-categories/berec/opinions/berec-preliminary-assessment-of-the-underlying-assumptions-of-payments-from-large-caps-to-isps>

<sup>23</sup> Draft BEREC 2024 Work Programme, pages 23-24.

<sup>24</sup> Ibid, page 28.

<sup>25</sup> Ibid, page 26

<sup>26</sup> Ibid, page 29.



In addition, we would like to suggest the organisation of a **joint workshop between BEUC and BEREC on the application of rights of end-users of the EECC**. We consider that one of the main takeaways of our previous workshop in November 2022 was that further discussions would still be needed to **fully assess all issues related to the implementation and enforcement of the EECC on this important area of the regulation**. There are two essential factors for this: **the very short period of application, and the transposition delays of the EECC** at the level of Member States. Therefore, BEUC would consider **useful to continue this discussion**, by repeating this joint experience in 2024. We encourage BEREC to continue its positive engagement with consumer organisations and consumer interests in this way.

Furthermore, BEUC also recommends BEREC to **carry out a study about the situation for consumer rights in electronic communications markets** and related providers' legal obligations. This can include the number of complaints not only received by NRAs but also consumer organisations per country, the topics subject to most concerns, enforcement actions taken as well as potential legislative gaps that should be filled.

Lastly, BEUC strongly **welcomes the report on empowering end-users through environmental transparency on digital products and services** and its focus on the issues of circular economy, especially in relation to life cycle of devices, premature obsolescence, and electronic waste. We fully appreciated the engagement and cooperation of BEREC and NRAs' with BEUC and its member organisations on this topic and the **important discussions of the dedicated workshop held in 2023**. Consumer organisations remain at BEREC's disposal on this important topic.

## 5. Comments on cooperation with EU institutions and institutional groups

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BEUC welcomes the emphasis on breaking the silos, improving and structuring institutional cooperation by "joining forces on certain topics in which synergies can be obtained".<sup>27</sup>

We particularly appreciate the continuation of its efforts to further engage with external bodies under its Medium-Term Strategy, and the establishment of a team to support the Chair and incoming Chair in maintaining an active relationship with external bodies.

## 6. Comments on BEREC's other tasks

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BEUC welcomes the continuous interest in **monitoring the implementation of the EECC** with its **report on the national experiences of the implementation of the EECC** and the manifested interest in organising a public workshop in Q2 2024 to exchange views with stakeholders. Nonetheless, we would recommend that this workshop is prioritised and organised as soon as possible, preferably in early 2024.

Although the implementation of the EECC was due to be finalised by the end of 2020, Member States have struggled to transpose the legislation in a timely way. Therefore, the focus of BEREC's work must continue to be the consistent implementation of the EECC, by providing knowledge and sharing of experience and best practices between the NRAs, in order to ensure a better monitoring of the key elements of the functioning of the EECC.

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<sup>27</sup> Ibid, page 33.



**BEREC's contribution within the High-Level Group for the enforcement of the Digital Markets Act (DMA)**<sup>28</sup> to ensure coherence and effective complementarity in the implementation of the DMA is also welcome. As BEREC shows its openness to contribute to the implementation of the DMA in different forms, such as conducting studies, workshops, and bilateral exchanges, we reiterate our availability to engage with BEREC in further discussions on these matters.

BEUC also thanks BEREC for its excellent benchmark reporting work on **roaming and intra-EU communications**, providing substantial evidence and useful analysis for a real and more competitive single market that benefits consumers. BEUC strongly supports the continuation of BEREC's essential work on data collection and substantive analysis, which is instrumental to obtain a clear view of the reality of the telecoms sector.

We welcome BEREC's intention to open a public consultation as soon as possible on the update of the **retail Guidelines on the Roaming Regulation**, and of the **Guidelines on Intra-EU communications**. Depending on the outcome of the legislative discussions, BEREC's work will be essential to ensure an adequate interpretation of the EU rules and ensure legal certainty for both consumers and operators. We encourage BEREC to engage with relevant stakeholders on this matter, including consumer organisations.

BEUC welcomes that BEREC will be further exploring its role in promoting **sustainability policies in the framework of the European Green Deal implementation**, engaging more actively on the issues of circular economy, especially in relation to life cycle of devices and electronic equipment and their impact on energy consumption and electronic waste. Consumer organisations also remain at BEREC's disposal on this important topic.

## 7. Comments on BEREC's stakeholder engagement

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BEUC strongly recommends **BEREC to place all its efforts in retaining and asserting its independence vis-à-vis policy makers and private stakeholders**. Following the policy developments in the telecoms sector over the past year and the upcoming policy debate on a potential regulatory intervention in this sector, we encourage BEREC to proceed with its work by making its consultations as inclusive as possible, listening to the greatest possible diversity of stakeholder views.

In this regard, we strongly welcome the commitment of BEREC to reinforce its dialogue with civil society and ensure its position as a highly trusted independent party. We welcome the focus on organising the yearly BEREC Stakeholder Forum and we strongly encourage BEREC to continue organising similar stakeholder events.

## 8. Comments on potential BEREC work in 2025 and beyond

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We welcome that BEREC continues its **work on 5G cybersecurity**<sup>29</sup> and its commitment to continue to provide support to the European Commission, NIS Cooperation Group and ENISA on this important work stream.

We especially welcome BEREC's openness to **further review the BEREC report on Internet of Things (IoT)**, following the positive discussions at its workshop on the challenges for IoT in October 2023.

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<sup>28</sup> Draft BEREC 2024 Work Programme, page 38.

<sup>29</sup> Ibid, page 48.

We also welcome BEREC's **commitment to engage in the review** of the Delegated act relating to Article 75 of the EECR on the termination rates for mobile and fixed voice calls.

In addition, BEUC would like to **encourage BEREC and the NRAs to take a proactive stance in the current discussions on the future of the EU telecoms regulatory framework**, following the announcement by the European Commission of an **upcoming policy proposal for 2025, a so-called 'Digital Networks Act'**.<sup>30</sup>

Based on the information currently made available by the European Commission, **BEUC would like to express concerns about the announced objectives** of this potential proposal,<sup>31</sup> which we believe would have detrimental impacts on competition, on the EU internal market and on consumers' interests. It would also undermine the principles enshrined in the European Electronic Communications Code (EECC).

**BEUC therefore calls on BEREC and its NRAs to actively engage and contribute to this discussion** to ensure that any new policy or legislative measure, such as the so-called 'Digital Networks Act' does not question the primary objectives of the EU legal framework for electronic communications enshrined in the EECR of "promoting competition, the internal market and the safeguard of end-user interests".<sup>32</sup>

Finally, BEUC would like to reiterate our recommendation that **public consultations should take place over longer periods of time**. Unfortunately, a four-week period is not enough for an umbrella organisation with limited resources, simultaneously working over a variety of topics, to properly and fully address all issues raised towards producing an added-value contribution. Short deadlines for public consultations on documents of such complexity risk excluding smaller stakeholders with more limited resources from adequately participating, therefore jeopardising the ultimate objective of collecting balanced, representative feedback from all stakeholders. This is particularly important in the case of consultations that are particularly relevant for consumer protection.

BEUC once again congratulates BEREC for its overall work and hopes these comments can help it further strengthen its work programme for 2024.

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<sup>30</sup> Informal Ministerial Meeting on Telecommunications in León, Spain: press conference by Nadia Calviño, Spanish First Deputy Prime Minister and Minister for Economic Affairs and Digital Transformation, and Thierry Breton, European Commissioner, available here: <https://audiovisual.ec.europa.eu/en/video/I-247943>

<sup>31</sup> <https://www.linkedin.com/pulse/digital-networks-act-redefine-dna-our-telecoms-thierry-breton/>

<sup>32</sup> European Electronic Communications Code, Recital 23. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018L1972>



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