BEUC The European Consumer Organisation

The Consumer Voice in Europe

Response to consultation

Response to BEREC's consultation on Work Programme 2027

October 2026

Why it matters to consumers

The independence and technical expertise of the Body of European Regulators for Electronic Communications (BEREC) is vital for applying relevant regulation, monitoring market developments, and ensuring that consumer rights are well protected in telecoms markets. BEREC's public consultation on its work programme is a key annual milestone to promote cooperation with relevant stakeholders, including consumer organisations. Following the proposal of the Digital Networks Act, and as simplification and deregulation continue to dominate the policymaking agenda, the role of BEREC in the coming year is crucial to ensure that consumers have access to quality and competitive services and that their end-user rights are adequately protected and enforced.

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Document coordinator | Srikar Govindaraju
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The European Consumer Organisation (BEUC) is the largest organisation promoting the general interests of Europe's consumers. Founded in 1962, it proudly represents more than 40 independent national consumer organisations from over 30 European countries. Together with our members, we inform EU policies to improve people's lives in a sustainable and fair economy and society.

BEUC, The European Consumer Organisation
Bureau Européen des Unions de Consommateurs, AISBL | Der Europäische Verbraucherverband
Rue d'Arlon 80, B-1040 Brussels • Tel. +32 (0)2 743 15 90 • www.beuc.eu
Enterprise No.: BE 0422 071 051 • EC register for interest representatives: identification number 9505781573-45

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1. Summary

BEUC welcomes the opportunity to provide feedback and input to BEREC's Work Programme for 2027, building upon our previous engagement with the Work Programme for 2026[1].

We welcome BEREC's continued commitment to upholding the strategic objectives of the European Electronic Communications Code (EECC) across its workstreams, alongside additional obligations and input on digital markets, artificial intelligence, and the ongoing changes to the digital acquis. The continued presence of BEREC's strategic priority to empower end-users is welcome, as well as the commitment to host another external workshop on end-user rights in 2027.

The European Commission's (EC) Digital Networks Act (DNA) proposal is also set to reshape the European telecommunications landscape in 2027, and BEREC's role as an independent, expert body will be essential to ensure that end-user rights, the open internet, and fair and competitive markets are preserved.

BEUC particularly supports the inclusion of the following elements in the work programme:

- The external workshops on the Telecoms Single Market, to determine what precisely this should mean.
- BEREC's contribution to the implementing act on intra-EU communications
- The external workshop on Copper Switch Off and the geographic delineation of switch off areas
- BEREC's report on the impact of generative AI on internet openness
- BEREC's report on IP-interconnection

BEUC further recommends BEREC to include the following items in its work programme for 2027:

- An external workshop on BEREC's input to the EC report on the Roaming Regulation
- A stakeholder consultation on BEREC's input to the Digital Fitness Check
- An expansion of the workshop on barriers to entry to the provision of ECS to include the consumer perspective

[1] BEUC, Response to BEREC Consultation on 2026 Work Programme, November 2025

2. Full connectivity and digital single market

2.1. Digital Networks Act

BEUC welcomes BEREC's continued engagement and expert insight into the Digital Networks Act (DNA). As work progresses on the file in both the Council and European Parliament, it is imperative that BEREC presents objective, technically sound input into discussions that risk becoming politicised. As an example, recent proposals by the rapporteur for the file in the Industry Trade and Research (ITRE) Committee revisit the concept of "network fees," and interference in the IP-Interconnection ecosystem.[2] This contradicts previous assessments by both BEREC[3] and the European Commission itself, which stated that the interconnection market is well functioning and requires no regulatory intervention.

BEUC also has concerns regarding the upholding of BEREC's independence following the proposal of creation of an Office for Digital Networks (ODN). BEUC strongly supports the independence of BEREC and NRAs, and will continue to monitor the development of the DNA as it progresses through the legislative process.

2.2. Telecoms Single Market

BEUC welcomes workshops on the development of the Telecoms Single Market. As stated in the Work Programme, there is currently no single, clear definition of what a single market would look like in practice. Therefore, it is important that any discussions on a single market for telecoms take into account all stakeholders, and in particular the impact on consumers. BEUC considers that an effective single market should work for consumers, not only businesses. This means offering consumers the most choice, at the best prices, and with the most competitive offers.

BEUC stands ready to support BEREC's work in this area, including exploring the consumer impacts and needs of a fully realised single market.

2.3. Contribution to the EC report on the roaming regulation

Roaming remains an integral element of supporting European consumers' access to connectivity, and the current framework has brought significant benefits to users through lower prices and simpler access. BEUC has always been a strong advocate for decreasing

[2] MEP Michal Kobosko, Digital Networks Act Draft Report, October 20 2026 (AM 545 – 552)

[3] BEREC Report on the IP Interconnection Ecosystem, 5 December 2024

wholesale roaming prices, and easing fair use policies to enable more consumer choice and greater competition among operators.

The recently published report from the Parliament's ITRE Committee rapporteur on the Digital Networks Act also proposes changes to wholesale roaming prices. Since this is now an active topic of discussion, with potential inclusion in the DNA, BEUC would request that BEREC organises a workshop on this topic to hear from all relevant stakeholders in the ecosystem before submitting its final Opinion on Fair Use and Sustainability.

2.4. Intra-EU communications regulation

BEUC welcomes BEREC's existing role in providing input to the Commission's implementing acts on intra-EU communications. In particular, Art.5a of Regulation 2015/2120 governing retail charges for regulated intra-EU communications. As noted in the BEREC Opinion on the Review of the Intra-EU Communications Regulation[4], the reduction of these prices has not had a significant impact on either the regulated volumes consumer or the number of consumers using such services.

We therefore welcome BEREC's contribution to a possible implementing act laying down measures to abolish differentiated retail prices for consumers between domestic and intra-EU communications. BEUC stands ready to support this work with evidence from our member base, as well as via any direct stakeholder discussions and consultations that may be organised.

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

The role of NRAs and BEREC is determining relevant markets is essential and must be continued, regardless of any changes to the regulatory framework via the DNA or otherwise. The consumer impact of changing markets, whether through consolidation, new entrants, or technological changes, can be sudden and unpredictable. It is therefore of utmost importance that BEREC's opinion be taken as a central component of the review of the Recommendation on Relevant Markets (RRM), and BEUC stands ready to support this work whether through participation in workshops, or stakeholder consultations.

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

BEUC welcomes the organisation of a workshop on the delineation of copper switch-off (CSO) areas, especially as the DNA proposes large changes in this area. BEUC's position

[4] BEREC Opinion on the Review of the Intra-EU Communications Regulation (March 2023)

remains that CSO must be driven by demand, and consumers must not be forced to transition to fibre, nor should they face limited choice when choosing fibre operators. For example, in the Netherlands the ACM has already acted to block an acquisition in the fibre market which would create an effective duopoly[5], an issue which may be replicated in other Member States as CSO plans are put in place.

BEUC looks forward to contributing to this workshop to present the consumer perspective, and reiterate the need for choice, fair prices, and demand driven transitions.

2.7. Digital Fitness Check

Further to ongoing legislative processes such as the Digital Omnibus and DNA, the Digital Fitness Check presents both an opportunity and a risk to consumer rights. BEUC welcomes BEREC's decision to provide input to the Fitness Check procedure, however we would request the inclusion of a public consultation.

The Fitness Check remains vaguely defined at present, but has the potential to create wide reaching changes for the digital regulation landscape. Moreover, as negotiations on the Omnibus and DNA are set to continue, the outcomes are not yet fully known and may have damaging consequences for consumer welfare if regulation is weakened, or made ineffective through changes to (for example) the GDPR, Digital Services Act, and Digital Markets Act. Given the potential scope of changes that may be proposed following the Fitness Check, we urge BEREC to allow for stakeholder input to its opinions.

3. Competition driven and open digital ecosystems

3.1. Workshop on barriers to the provision of ECS

BEUC welcomes BERECs continued work on market analysis and fair competition. MVNOs and MNOs make up a crucial segment of the market, and provide competitive and innovative offers for consumers. As noted in the work programme, restrictions imposed by device manufacturers and OS providers, 2G and 3G phaseout, and larger ECS providers, all have a detrimental impact on the ability for new entrants and challengers to compete in telecoms markets.

We would urge BEREC to expand the scope of this workshop and include consumers and other civil society stakeholders in the discussion, to obtain the full perspective of how such restrictions not only impact MVNOs and MNOs, but the impact on consumer choice as well.

[5] ACM blocks acquisition of Delta's fiber-optic networks by KPN's joint venture, 6 August 2026

3.2. Contribution to the implementation of the DMA

BEUC welcomes the active contribution of BEREC to work on the implementation of the DMA. The DMA is a key area of focus for BEUC, as we currently see the increasing vertical integration of services having a direct impact on consumer choice and interoperability. Vertical integration of services such as cloud and AI also has a direct impact on new entrants to communications market, and ineffective implementation of the DMA means consumers remain trapped in so-called “walled gardens” set up by gatekeepers.

We welcome BEREC's commitment to further monitor developments in digital markets of the effects of actions taken by large platforms, including potential future risks. BEUC is also actively monitoring these developments, and stands ready to support BEREC's important work in this area.

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

We welcome BEREC's commitment to work on this rapidly developing area, which has the potential to reshape the way consumers interact with the internet and online services. Consumer harms are already emerging from the current AI tools available on the market, with AI search results restricting the scale of information that consumers have access to, and the integration of AI tools into popular services driving consumers to stay within the ecosystems established by large technology companies.

There is a further risk that through changes to net neutrality rules, as proposed in the DNA, we may see the introduction of AI fastlanes that will further drive traffic to these services. In conjunction, proposals in the Digital Omnibus to ease access to personal data for training AI models will allow even more rapid and intrusive development of these products. BEUC remains available to support any future work in this area.

4. Empowering end-users

4.1. Report on IP Interconnection

BEUC welcomes BEREC's active and continued role in assessing the state of the IP interconnection market, in particular as work on the DNA continues. The recently published report from the ITRE rapporteur proposes the introduction of a "Facility for ecosystem cooperation,”[6] which if implemented could have drastic effects on the functioning of IP-interconnection. BEUC has long maintained, along with BEREC, that intervention in IP-interconnection would likely create detrimental effects for consumers, and is not motivated by any market failure.

[6] MEP Michal Kobosko, Digital Networks Act Draft Report, October 20 2026 (AM 547)

We look forward to the opportunity to contribute to BEREC's public consultation on this report, and any further surveys or workshops that may be needed to obtain a holistic view of this subject.

4.2. Report on the implementation of the Open Internet Regulation and the BEREC Open Internet Guidelines

Further to the DNA proposal, which integrates the Open Internet Regulation (OIR) under Art.93, BEREC's report on the implemention of the OIR is more essential than ever before. BEUC's position on the DNA[7] calls for the OIR to remain a standalone regulation, so that its objectives are not conflated with the DNA's larger aims of creating a single market for telecoms. Further, the Commission's proposal to grant itself the powers to designate specialised services places the Open Internet at further risk of being watered down or bypassed entirely.

We welcome BEREC's continued analysis and reporting on this essential element of Europe's telecoms rulebook.

4.3. Opinion on end users' rights

We welcome BEREC's continued activities in this area through its working group. In light of the changes to end-user rights proposed in the DNA, most notably the provisions prohibiting Member States from going beyond the text of the regulation, serious consideration must be given to what impacts this will have on end-users if consumer protections are diminished. For example, BEUC's German member vzbv has identified protections around contractual summaries, and anti-pressure selling measures that may be lost if the DNA's "maximum harmonisation" proposal is implemented.[8]

Consequently, we would urge BEREC to continue its active engagement with consumer rights organisations on this topic with a public consultation to contribute to this opinion, which would also enable further stakeholder participation beyond the workshop planned for Q2 2027.

4.4. Workshop on end-user rights

BEUC and BEREC have a longstanding working relationship organising joint workshops on end-user rights,[9] and we look forward to contributing again to the next iteration in 2027. The proposed changes in the DNA are of significant concern, and in many Member States there is a real risk that important consumer protections are lost.

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[7] BEUC, Connecting the dots: a Digital Networks Act that works for consumers, June 2026, p.10

[8] vzbv, "For a fair, open and user-friendly digital network in Europe," 14 April 2026, p.5-9

[9] BEREC BEUC Joint Workshop on End-User Rights, 15 October 2025

BEUC and its members remain open and available to exchange views and provide evidence on this topic, and to contribute towards BEREC's work on the DNA.

5. Sustainable, secure, and resilient digital infrastructures

5.1. Combatting fraud

We welcome BEUC's ongoing commitment to develop best practices on combatting fraud. End-users are at more risk of fraudulent activity than ever, driven by rapidly evolving technology such as AI that enables new methods of targeting and exploiting vulnerabilities. BEUC has been actively working on the isuse of fraud, notably through our "Sponsored by Scammers" action which identified the large scale of fraudulent adverts being permitted on social media websites.[10]

As identified by BEREC, and reiterated in the DNA, telecom networks and ISPs have an essential role to play in preventing the spread of fraudulent activity. We look forward to the opportunity to contribute to this work, through the anticipated consultations, and any further external workshops that BEREC plans to host in the coming months.

6. Potential work 2028 and beyond

6.1. DNA implementation

BEUC notes the deliverables assigned to BEREC under the DNA, and welcomes the continued role of BEREC in providing impartial, independent, and technical expertise to the implementation of telecommunications policy. BEREC's guidance will be of significant importance if the DNA is adopted with the proposed number of implementing acts, which will grant the Commission significantly greater powers than ever before.

BEUC remains available to support BEREC in the development of any guidelines on topics impacting end-user rights, fair competition, and an open internet.

ENDS

[10] BEUC, Sponsored by Scammers, May 2026