

DSM Questionnaire

Fields marked with * are mandatory.

Stakeholder Survey on the EECC & the Digital Single Market

Stakeholder Survey on EECC & the Digital Single Market

The Directorate General for Communication Networks, Content and Technology of the European Commission has commissioned EY Economic and Policy Advisory Services SRL (EY) and WIK-Consult to conduct three studies, in support of the assessment of the functioning of the EECC. The three studies are: “Completing the Digital Single Market - Regulatory enablers for cross-border networks”, “Review of Access Regulation under the European Electronic Communications Code and analysis of future Access policy in full fibre environment” and “Financial conditions, demand and investment needs and their regulatory and policy implications including the review of universal service”.

This survey aims to collect stakeholder views and evidence related to potential amendments of the legal framework for electronic communications. The survey covers the following topics:

1. Objectives of the EECC
2. Scope and level-playing field
3. Quality-based services
4. General authorisation
5. Numbering
6. Mobile / wireless services and spectrum
7. Access-related provisions
8. Environmental sustainability
9. Universal service
10. End-user protection
11. Regulatory governance
12. Finalisation

This survey should be read in conjunction with the [Call for Evidence](#) published by the Commission in June 2025. General considerations by respondents of this survey concerning the problem identified and other general observations could be submitted as part of the feedback of the Call for Evidence, whereas more detailed elements regarding policy options could be included in the reply to this survey.

Survey instructions

Please start the survey by answering the mandatory questions of the section “About you”. The remaining questions of the survey are optional. You are invited to click on the tabs of various sections and answer only those questions, of which you have knowledge and can provide evidence. You can skip the whole sections of questions by choosing a different tab.

You can download the PDF version of the survey questionnaire [here](#) and prepare your answers in advance. Please note that the visual presentation of the questions in the survey tool looks different from the one on paper. The support letter from the European Commission can be downloaded [here](#).

The survey will be open until 17:00 CET on 11 July 2025, after which the survey will be taken offline. Please upload your answers until then.

Data protection notice

The Commission services and the consortium study team will make use of your contribution (information /data provided) only for the needs of the external supporting study and the staff working document to be prepared by the Commission services.

All answers received will be processed and stored securely by EY in compliance with the EU General Data Protection Regulation (GDPR). The answers you provide will not be published and will be retained by EY for as long as necessary for the successful completion of the study and will be deleted thereafter. Your answers will be treated confidentially, and only the analysis of the responses will be published.

Thank you for taking the time to respond to this survey – we highly appreciate your feedback. If you have any questions concerning the study, please feel free to contact the project team at Gilles.Van.Cappellen@be.ey.com.

Section 0: About you

Which category of stakeholder do you represent? Please select the category that fits your organisation best.

Maximum 1 selection(s)

- ☐ NRA
- ☐ National competent authority
- ☐ Company (provider of ICT services)
- ☐ Company (user of ICT services)
- ☐ Business/industry association representing providers of ICT services
- ☐ Other business/industry association
- ☐ Academia
- ☐ Consumer protection organisation
- ☐ Civil rights organisation
- ☐ Organisation representing environmental interest
- ☐ Other

Please specify the type of your organisation.

On behalf of which country are you replying?

- ☐ Austria
- ☐ Belgium

- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czechia
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta
- ☐ Netherlands
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Slovakia
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden

In which country do you operate?

- ☐ EU-wide
- ☐ Austria
- ☐ Belgium
- ☐ Bulgaria
- ☐ Croatia
- ☐ Cyprus
- ☐ Czechia
- ☐ Denmark
- ☐ Estonia
- ☐ Finland
- ☐ France
- ☐ Germany
- ☐ Greece
- ☐ Hungary
- ☐ Ireland
- ☐ Italy
- ☐ Latvia
- ☐ Lithuania
- ☐ Luxembourg
- ☐ Malta

- ☐ Netherlands
- ☐ Poland
- ☐ Portugal
- ☐ Romania
- ☐ Slovakia
- ☐ Slovenia
- ☐ Spain
- ☐ Sweden

Please indicate the ICT business activities in which you or your members are active?

- ☐ Fixed-network provider
- ☐ MNO
- ☐ MVNO
- ☐ Satellite operator
- ☐ Cloud/ hosting provider
- ☐ Content and application provider
- ☐ Broadcaster
- ☐ Other

Please specify

Which of the following best characterises your business model?

- ☐ Vertically integrated former incumbent
- ☐ Vertically integrated alternative operator
- ☐ Cable operator Wholesale only infrastructure company (netco)
- ☐ Other

Please specify the characteristics of your business model.

Which technologies do you use to provide fixed broadband services?

- ☐ Copper including FTTC / VDSL
- ☐ FTTH / B
- ☐ Cable
- ☐ Wireless incl. fixed wireless access (FWA)
- ☐ Other

Please specify.

* Please indicate the name of the organisation/institution you represent.

Please leave your name. These details are requested in case there is a need for follow-up in case responses to the open questions are unclear or there are duplicate responses. Your name will not be disclosed or used for purposes other than the processing of the online survey.

Please leave your contact email. These details are requested in case there is a need for follow-up in case responses to the open questions are unclear or there are duplicate responses. Your contact email will not be disclosed or used for purposes other than the processing of the online survey.

Please indicate the number of employees associated with your EU operations.

- ☐ Less than 10 employees
- ☐ 10-49 employees
- ☐ 50-99 employees
- ☐ 100-249 employees
- ☐ 250-999 employees
- ☐ More than 1000 employees

Please indicate the turnover associated with your EU operations.

- ☐ Less than EUR 900,000
- ☐ EUR 900,001 to EUR 9,999,999
- ☐ EUR 10,000,000 to EUR 14,999,999
- ☐ EUR 15,000,000 to EUR 49,999,999
- ☐ EUR 50,000,000 to EUR 449,999,999
- ☐ EUR 450,000,000 to EUR 1bn
- ☐ More than EUR 1 bn

Section 1: Objectives of the EECC

The EECC pursues four regulatory objectives (Art. 3(2) EECC): promoting While these objectives remain relevant, technological, economic and policy developments of the recent years may require some adjustments of the EECC objectives.

The aim of the study on “Completing the Digital Single Market - Regulatory enablers for cross-border networks” is to assess whether it may be appropriate to amend the current regulatory objectives of Art. 3(2) EECC or add new ones to ensure that the regulatory framework remains future-proof and effective.

Is there a need to change the regulatory objectives set out in Art. 3(2) of the EECC? When answering, please take into account policy developments since the EECC’s adoption in 2018, such as the European Green Deal, EU Digital Decade, Competitiveness Compass, EU Preparedness Strategy etc.

- ☐ Yes
- ☐ No
- ☐ No opinion

Please explain your answer

If new regulatory objectives are added, what would be the relative benefits compared with the costs of adding a regulatory objective regarding:

	1 - Costs significantly outweigh the benefits	2	3	4	5 - Benefits significantly outweigh the costs
Competitiveness	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental sustainability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Resilience and security	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your answers

Should any other regulatory objectives be added?

- ☐ Yes
☐ No
☐ No opinion

Please explain your answers

If objectives are added, should there be a hierarchy of objectives e.g. with objectives such as competitiveness and end-user welfare being the ultimate goal, while others such as competition, promotion of the internal market etc provide the means?

- ☐ Yes
☐ No
☐ No opinion

Please indicate the main problems of creating a hierarchy of regulatory objectives in the EECC.

Please indicate the main benefits of creating a hierarchy of regulatory objectives in the EECC.

Section 2: Scope and level playing field

Reflecting the emergence of a broader connectivity ecosystem and the need for a level playing field, one of the issues to be addressed in the present study is related to the regulatory treatment of cooperation between various players, including IP interconnection.

Would there be a benefit in proposing a harmonised approach at the EU level to the regulatory treatment of IP interconnection?

- ☐ Yes, the current situation is not clear enough.
- ☐ No, the current situation is clear enough.
- ☐ No opinion

Please indicate how beneficial the following measures would be:

	1 - Not beneficial	2	3	4	5	6	7	8	9 - Most beneficial
Cooperation mechanism between network providers and CAPs, including on IP interconnection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Amendment of the definition of interconnection in Art. 2 (28) EECC to explicitly include IP interconnection	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Amendment of Art. 61 EECC to empower NRAs to impose IP interconnection obligations under certain conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Amendment of Art. 26 EECC to explicitly include IP interconnection under the dispute settlement mechanism of NRAs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please select which issues could be addressed in relation to a possible cooperation mechanism:

- ☐ Traffic forecasting
- ☐ Pricing mechanisms for IP peering
- ☐ Usage of technologies for reducing bandwidth in data transfers (codecs, data compression algorithms, etc.)
- ☐ Templates for Service level agreements for QoS of end-to-end connections
- ☐ Other

Please specify.

For the measures ranked 7-9, please describe what benefits can materialise them.

	Benefits
Voluntary code of conduct on issues related to cooperation between network providers and CAPs, including on IP interconnection	
Amendment of the definition of interconnection in Art. 2(28) EEC to explicitly include IP interconnection	
Amendment of Art. 61 EEC to empower NRAs to impose IP interconnection obligations under certain conditions	
Amendment of Art. 26 EEC to explicitly include IP interconnection under the dispute settlement mechanism of NRAs	

For the measures ranked 1-3, please explain why these measures are not beneficial. If additional burden is expected, please identify it and quantify, if possible.

	Not beneficial	Additional burden	Quantifying the additional burden
Voluntary code of conduct on issues related to cooperation between network providers and CAPs, including on IP interconnection			
Amendment of the definition of interconnection in Art. 2 (28) EECC to explicitly include IP interconnection			
Amendment of Art. 61 EECC to empower NRAs to impose IP interconnection obligations under certain conditions			
Amendment of Art. 26 EECC to explicitly include IP interconnection under the dispute settlement mechanism of NRAs			

Please explain why **no benefits** would result from clarification.

Section 3: Quality-based services

To support innovation and enhance investments in new technologies and services in electronic communications sector as well as competitiveness across the EU single market, it is necessary to provide additional clarification on the regulatory treatment of new quality-based services (e.g. services which assure a given level of quality regarding bandwidth or other factors end-to-end in order to support the provision of specialised services). This study aims to explore how the regulatory framework can be improved for quality-based services.

Would the clarification of regulatory regime for quality-based services be beneficial?

- ☒ Yes
☐ No
☐ No opinion

Please indicate how beneficial the following measures would be:

	1 - Not beneficial	2	3	4	5	6	7	8	9 - Most beneficial
European Commission's guidelines/ recommendation on the application of the Open Internet Regulation to 5G/6G	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Additional clarification on the application of the Open Internet Regulation to 5G/6G and other quality enabling technologies in the legislation by targeted recitals or annexes	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Explicit definition of specialised services in the Open Internet Regulation in the light of 5G/6G and other quality-enabling technologies	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Explicit definition of specialised services in the Open Internet Regulation in the light of 5G/6G and other quality-enabling technologies; and adjustment of the scope of Open Internet rules for B2B and B2G; and empowerment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

for consumers to choose innovative offers by opt-out from Open Internet requirements									
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify

What benefits are most likely to materialise from *European Commission's guidelines/ recommendation on the application of the Open Internet Regulation to 5G/6G?*

	1 - Least likely	2	3	4	5	6	7	8	9 - Most likely
More innovation in quality-based services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Greater choice and more empowerment for consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Higher level of harmonisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased legal certainty	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify the other category - if applicable.

What benefits are most likely to materialise from the *additional clarification on the application of the Open Internet Regulation to 5G/6G in the legislation by targeted recitals or annexes?*

	1 - Least likely	2	3	4	5	6	7	8	9 - Most likely
More innovation in quality-based services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Greater choice and more empowerment for consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Higher level of harmonisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased legal certainty	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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Please specify the other category - if applicable.

What benefits are most likely to materialise from the *explicit definition of specialised services in the Open Internet Regulation in the light of 5G/6G and other quality-enabling technologies?*

	1 - Least likely	2	3	4	5	6	7	8	9 - Most likely
More innovation in quality-based services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Greater choice and more empowerment for consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Higher level of harmonisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased legal certainty	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify the other category - if applicable.

What benefits are most likely to materialise from the *explicit definition of specialised services in the Open Internet Regulation in the light of 5G/6G and other quality-enabling technologies; and adjustment of the scope of Open Internet rules for B2B and B2G; and empowerment for consumers to choose innovative offers by waving Open Internet requirements*

	1 - Least likely	2	3	4	5	6	7	8	9 - Most likely
More innovation in quality-based services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Greater choice and more empowerment for consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Higher level of harmonisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased legal certainty	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify the other category - if applicable.

What benefits are most likely to materialise from your defined *other* measure.

	1 - Least likely	2	3	4	5	6	7	8	9 - Most likely
More innovation in quality-based services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved competition	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Greater choice and more empowerment for consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Higher level of harmonisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased legal certainty	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify the other category - if applicable.

Please explain why you consider the *European Commission's guidelines/ recommendation on the application of the Open Internet Regulation to 5G/6G* **not beneficial**.

If additional burden is expected from the measures, please identify it and quantify, if possible.

Please explain why you consider the *additional clarification on the application of the Open Internet Regulation to 5G/6G in the legislation by targeted recitals or annexes* **not beneficial**.

If additional burden is expected from the measures, please identify it and quantify, if possible.

Please explain why you consider the *explicit definition of specialised services in the Open Internet Regulation in the light of 5G/6G and other quality-enabling technologies* **not beneficial**.

If additional burden is expected from the measures, please identify it and quantify, if possible.

Please explain why you consider the *explicit definition of specialised services in the Open Internet Regulation in the light of 5G/6G and other quality-enabling technologies; and adjustment of the scope of*

Open Internet rules for B2B and B2G; and empowerment for consumers to choose innovative offers by waving Open Internet requirements **not beneficial**.

If additional burden is expected from the measures, please identify it and quantify, if possible.

Please explain why you consider the *other measure* **not beneficial**.

If additional burden is expected from the measures, please identify it and quantify, if possible.

Please explain why a clarification will not be beneficial or is not necessary.

Section 4: General authorisation

Although the EECC contributed to the greater harmonisation of the general authorisation regime, many differences persist across Member States. To further lower barriers to market entry for electronic communications services and reduce compliance costs and market fragmentation, this study aims to explore possible improvements to the general authorisation regime.

Please indicate how beneficial the following changes to the general authorisation would be:

	1 - Not beneficial	2	3	4	5	6	7	8	9 - Most beneficial
Simplification of the current EECC list of harmonised and non-harmonised conditions attached to general authorisation (please consider Art. 13 and Annex I EECC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introduction of the maximum harmonisation of the conditions to general authorisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplification of conditions attached to rights of use of extraterritorial numbers of B2B services.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Creation of a national single point of contact in each MS regarding all other requirements and rules for ECN/ECS providers (including all general authorisation conditions)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Introduction of a coordination mechanism between NRAs and other national competent authorities, incl. those beyond the EECC (e.g. cybersecurity)									
Adoption of guidelines on standardised implementation of non-harmonised conditions of general authorisation (incl. cross-border provision)									
Harmonisation of annual reporting under Arts. 20-21 EECC (e.g. by adopting guidelines, templates)									
Making the BEREC notification template mandatory									
Adoption of an annual mandatory template									
Introduction of a one-stop-shop for the notification for cross-border providers (i.e. notification to be submitted only in one Member States or to BEREC), while indicating in which Member States the operators plans to be active									
Introduction of a Union notification for B2B network providers (i.e. only those that do not provide B2C)									

For the selected **measures** you ranked **7-9**, please explain what **benefits** are expected in the second column.

In the third column, **NRAs** mention types of **additional costs** do you expect to incur in connection with the selected measures? Please quantify if possible.

In the fourth column, **companies** and **authorities** should mention the **cost savings** you expect? Please quantify if possible.

	Benefits	Costs (NRAs)	Cost savings (companies and authorities)
Simplification of the current EECC list of harmonised and non-harmonised conditions attached to general authorisation (please consider Art. 13 and Annex I EECC)			
Introduction of the maximum harmonisation of the conditions to general authorisation			
Simplification of conditions attached to rights of use of extraterritorial numbers for B2B services			
Creation of a national single point of contact in each MS regarding all other applicable requirements and rules for ECN/ECS providers (including all general authorisation conditions)			
Introduction of a coordination mechanism between NRAs and other national competent authorities, incl. those beyond the EECC (e.g. cybersecurity)			
Adoption of guidelines on standardised implementation of non-harmonised conditions of general authorisation (incl. cross-border provision)			
Harmonisation of annual reporting under Arts. 20-21 EECC (e.g. by adopting guidelines, templates)			
Making the BEREC notification template mandatory			
Adoption of an annual mandatory template			
Introduction of a one-stop-shop for the notification for cross-border providers (i.e. notification to be submitted			

only in one Member States or to BEREC), while indicating in which Member States the operators plans to be active			
Introduction of a Union notification for B2B network providers (i.e. only those that do not provide B2C)			

Please provide examples of harmonised conditions attached to general authorisation that can be simplified or removed. For non-harmonised conditions, please indicate the level of flexibility applied at the national level.

Please provide examples of conditions attached to rights of use that can be simplified.

For the selected **measures** you ranked **1-3**, please explain why the proposed measure is **not beneficial**. If additional burden is expected, please identify it and quantify, if possible.

	Reason for not being beneficial
Simplification of the current EECC list of harmonised and non-harmonised conditions attached to general authorisation (please consider Art. 13 and Annex I EECC)	
Introduction of the maximum harmonisation of the conditions to general authorisation	
Simplification of conditions attached to rights of use of extraterritorial numbers for B2B services	
Creation of a national single point of contact in each MS regarding all other applicable requirements and rules for ECN/ECS providers (including all general authorisation conditions)	
Introduction of a coordination mechanism between NRAs and other national competent authorities, incl. those beyond the EECC (e.g. cybersecurity)	
Adoption of guidelines on standardised implementation of non-harmonised conditions of general authorisation (incl. cross-border provision)	
Harmonisation of annual reporting under Arts. 20-21 EECC (e.g. by adopting guidelines, templates)	
Making the BEREC notification template mandatory	
Adoption of an annual mandatory template	
Introduction of a one-stop-shop for the notification for cross-border providers (i.e. notification to be submitted only in one Member States or to BEREC), while indicating in which Member States the operators plans to be active	
Introduction of a Union notification for B2B network providers (i.e. only those that do not provide B2C)	

Section 5: Numbering

The questions in this section target only for NRAs, NCAs, businesses and business / industry associations. If you do not see any questions, please select a different section with questions.

Did you assign non-geographic numbers which may be used for the provision of M2M/IoT services throughout the union in line with Article 93(4) EECC?

- ☐ Yes
☐ No

What are the conditions attached to the rights for use of numbering resources that may be used extraterritorially, in accordance with Article 93(4)?

Are there specific conditions imposed to such rights in order to ensure compliance with relevant consumer protection rules or national law related to the use of numbering resources applicable in the Member State where the numbering resources are used?

- ☐ Yes
☐ No

Please briefly describe these conditions.

In the past 2 years, how many requests did national regulatory or competent authorities receive from national regulatory or other competent authority of another Member State where such numbering sources were used indicating breach of relevant consumer protection rules or national law related to the use of numbering resources (provide a whole number)?

Only values of at least 0 are allowed

Was BEREC involved to facilitate and coordinate the exchange of information between competent authorities?

- ☐ Yes
☐ No

Please indicate what are the bottlenecks in terms of the use of numbering resources for the deployment of pan- European M2M/IoT services.

Please indicate if national numbering resources with the right to be used extraterritorially are fit for the deployment of pan-European M2M/IoT services.

Are there or should there be alternatives fit for pan-European M2M/IoT services preferable to national numbering resources?

- ☐ Yes
☐ No
☐ No opinion

Please explain your answer.

Section 6: Mobile and wireless services / spectrum

As we see insufficient investments in high quality 5G and limited regulatory predictability for spectrum assignments, leading to unexploited single market potential, the EU legal framework related to mobile and wireless services may need to be amended to support the deployment and take-up of high capacity mobile connectivity while ensuring competition and innovation in 5G services, to create common approaches to support cross-border services and to enhance EU sovereignty in spectrum management. The aim of the current study is to explore potential measures in all these areas.

Single market

The current EECC strengthens the single market by emphasizing the importance of harmonising spectrum, by coordination in spectrum assignment (Arts. 53 and 54 EECC) and through Article 35 whereby Member States may ask the RSPG to carry out a peer review on procedures for the award of harmonised spectrum bands.

Please indicate the degree to which you consider that the following measures would be the most effective in ensuring **consistency** in spectrum assignment procedures:

	1 - Ineffective	2	3	4	5	6	7	8	9 - Most effective
Strengthen the Peer Review process (Art. 35 EECC)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Simplify and reduce fragmentation for satellite authorisation through, e.g. templates or common authorisation conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strengthen the coordination of spectrum awards between Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Strengthen MS obligations to resolve intra-EU cross-border harmful interference, e.g. set binding deadlines for disputes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Allow/facilitate other actors than electronic communications operators to own spectrum, e.g. tower companies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify

For the measures ranked **7-9**, please select what **benefits** are expected.

	Greater harmonisation of technical conditions for use or authorisations	Consumer benefits	More innovation (e.g. new services)	Improved competition	Increased investments	Improved efficiency of decision-making	More efficient use of spectrum	Allowing economies of scale	Fostering cross-border networks and services	Other
Strengthen the Peer Review process (Art. 35 EECC)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Simplify and reduce fragmentation for satellite authorisation through, e.g. templates or common authorisation conditions	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strengthen the coordination of spectrum awards between Member States	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Strengthen MS obligations to resolve intra-EU cross-border										

harmful interference, e. g. set binding deadlines for disputes	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Allow/facilitate other actors than electronic communications operators to own spectrum, e.g. tower companies	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please specify

Please further **explain** and **quantify** the identified **benefits** of the measures that you ranked **7-9**, if possible.

	Explanation benefits	Quantifying the benefits
Strengthen the Peer Review process (Art. 35 EECC)		
Simplify and reduce fragmentation for satellite authorisation through, e.g. templates or common authorisation conditions		
Strengthen the coordination of spectrum between Member States		
Strengthen MS obligations to resolve intra-EU cross-border harmful interference, e.g. set binding deadlines for disputes		
Allow/facilitate other actors than electronic communications operators to own spectrum, e.g. tower companies;		
Other		

For the measures ranked **1-3**, explain why you consider that these measures would **not be beneficial**. If an additional burden resulting from these measures is expected, please identify it and quantify, if possible.

	Explanation why the measure is not beneficial	Potential additional burden	Quantifying the potential additional burden
Strengthen the Peer Review process (Art. 35 EECC)			
Simplify and reduce fragmentation for satellite authorisation through, e.g. templates or common authorisation conditions			
Strengthen the coordination of spectrum between Member States			
Strengthen MS obligations to resolve intra-EU cross-border harmful interference, e.g. set binding deadlines for disputes			
Allow/facilitate other actors than electronic communications operators to own spectrum, e.g. tower companies;			
Other			

Please rank the following measures based on which one would be the most effective in *promoting and strengthening the Peer Review process*.

	1 - Ineffective	2	3	4	5	6	7	8	9 - Most effective
Peer review process should be mandatory	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States should be required to take Peer Review feedback into account	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Certain elements of spectrum awards procedures to be scrutinised at the EU level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Peer Review process could be applied to any spectrum band beyond harmonised spectrum	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain and quantify the benefits resulting from your choice, if possible

Please select what elements should be part of a *framework for satellite authorisations at the EU level*:

	Yes	No	I don't know
ITU notification and coordination	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU-level mechanism for satellite operators' selection, (based e.g. on the Mobile Satellite Services Decision)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU template for simplifying satellite authorisations at national level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
One stop shop procedure for getting satellite authorisations in more than one Member State	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Common satellite authorisation at the EU level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Operator's right to request a joint authorisation at the EU level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Operator's right to request coordinated assignment conditions across multiple Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify

Please select what benefits are expected from simplifying and reducing fragmentation for satellite authorisation through, e.g. templates or common authorisation conditions.

- ☐ Greater harmonisation of conditions for the provision of satellite services
- ☐ Reduced administrative burden for satellite operators
- ☐ Consumer benefits
- ☐ More innovation (e.g. new services)
- ☐ Improved competition
- ☐ Increased investments
- ☐ Reduced administrative burden for national authorities
- ☐ Improved efficiency of decision-making
- ☐ More efficient use of spectrum
- ☐ Allowing economies of scale
- ☐ Fostering cross-border networks and services
- ☐ Other

Please specify

Please explain and quantify the benefits resulting from your choice, if possible.

Please choose which measures would be the most effective to *coordinate the timing of spectrum awards between Member States*:

	1 - Ineffective	2	3	4	5	6	7	8	9 - Most effective
Evolving roadmap for the timely availability of spectrum at EU level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
National roadmaps for the availability of spectrum coordinated with EU roadmap	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legal deadlines for spectrum awards in various bands	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify

Please explain your answer and quantify the benefits resulting from your choice, if possible.

What would be the consequences of not taking any new measures regarding spectrum awards?

Please choose the most effective way(s) to *resolve intra-EU harmful interference cases*.

	1 - Ineffective	2	3	4	5	6	7	8	9 - Most effective
Impose deadlines on Member States to mitigate the intra-EU cross-border interference	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Apply additional measures in EU-harmonised bands only	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Apply additional measures in all bands	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Private enforcement in cases of harmful interference (i.e. operators suing Member States that fail to resolve a case)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify

Please explain and quantify the benefits resulting from your choice, if possible.

Section 6: Mobile and wireless services/ spectrum

Fostering investment and sustainable competition










What measures do you think could best support investment in future mobile generations? Please indicate how effective you think the following measures would be in fostering investments in mobile and wireless infrastructure?



















	1- Ineffective	2	3	4	5	6	7	8	9- Most effective
Measures designed to limit the costs of obtaining spectrum licenses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>










Coverage and quality of service commitments in licences									
Longer licence duration									
Automatic/ easier renewal of licences									
Increase the burden of proof for spectrum management authorities (SMAs) when imposing market shaping measures (such as measures which affect the number of infrastructures and quality requirements) by requiring them to better take into account the need for investment in infrastructure and the need to support an economically viable level of infrastructure competition									
Requirement for Spectrum Management Authorities (SMAs) to take into account EU mobile / wireless connectivity targets and associated investment needs when considering what would constitute a sustainable market structure, and what should be the associated coverage and quality of service obligations									
More coordination at EU level regarding spectrum authorisation and associated conditions to ensure predictability and consistent application of measures , while respecting national specificities									
No specific measures are necessary									

For the measures ranked **7-9**, please choose what **benefits** are expected:

	Greater predictability and harmonisation	Consumer benefits	More innovation (e.g. new services)	Improved competition	Increased investments due to increased predictability and increased ability to ensure financing	Wider coverage with VHCNs	Improved efficiency of decision-making	Promote spectrum trading	Other
Measures designed to limit the costs of obtaining spectrum licenses	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Coverage and quality of service commitments in licences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Longer licence duration	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Automatic/ easier renewal of licences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase the burden of									

proof for spectrum management authorities (SMAs) when imposing market shaping measures (such as measures which affect the number of infrastructures and quality requirements) by requiring them to better take into account the need for investment in infrastructure and the need to support an economically viable level of infrastructure competition									
Requirement for Spectrum Management Authorities (SMAs) to									

take into account EU mobile / wireless connectivity targets and associated investment needs when considering what would constitute a sustainable market structure, and what should be the associated coverage and quality of service obligations									
More coordination at EU level regarding spectrum authorisation and associated conditions to ensure predictability and									

consistent application of measures , while respecting national specificities									
No specific measures are necessary									

Please specify

For the measures ranked **1-3**, please explain why you consider that they are **not beneficial**. If additional burden is expected in relation to these measures, please identify it and quantify, if possible.

	Not beneficial	Additional burden	Quantifying the additional burden
Measures designed to limit the costs of obtaining spectrum licenses			
Coverage and quality of service commitments in licences			
Longer licence duration			
Automatic/ easier renewal of licences			
Increase the burden of proof for spectrum management authorities (SMAs) when imposing market shaping measures (such as measures which affect the number of infrastructures and quality requirements) by requiring them to better take into account the need for investment in infrastructure and the need to support an economically viable level of infrastructure competition			
Requirement for Spectrum Management Authorities (SMAs) to take into account EU mobile / wireless connectivity targets and associated investment needs when considering what would constitute a sustainable market structure, and what should be the associated coverage and quality of service obligations			
More coordination at EU level regarding spectrum authorisation and associated conditions to ensure predictability and consistent application of measures , while respecting national specificities			
No specific measures are necessary			

What would be the consequences of not taking any new measures to foster investments in 5G and the current legal framework is maintained?

If you consider that longer licence durations than the current minimum duration of (15+5) would support investment and sustain competition, please indicate the one you consider the most effective:

- ☐ Duration of 25 years with conditional renewal
- ☐ Duration of 25 years with automatic renewal
- ☐ Duration of 30 years with conditional renewal
- ☐ Duration of 30 years with automatic renewal
- ☐ Duration of 40 years with conditional renewal
- ☐ Duration of 40 years with automatic renewal
- ☐ Indefinite licence duration
- ☐ Other

Please specify

Please provide a justification for your answer (e.g. explain the rationale based on economic elements, investment cycles, other elements and present any evidence supporting the adequacy of the proposed length)

Do you agree that the investment requirements of future generations of mobile technologies, especially those with high Quality of Service (QoS) requirements and those relying also on higher frequency spectrum bands, may limit the viability of duplicating mobile networks when it comes to investing in new generations of mobile infrastructure?

- ☐ Yes
- ☐ No
- ☐ No opinion

Please provide a justification for your answer.

In cases where there is limited economic rationale to replicate mobile infrastructure **and** a forward looking assessment of the competitive conditions in the market concludes that there is high likelihood that retail competition would be undermined, what measures, if any, do you consider might be most effective in ensuring that competition in mobile networks and/or mobile services can be sustained at the retail level?

	1- ineffective and/or harmful	2	3	4	5	6	7	8	9- most effective

Support/provide incentives for wholesale only models	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Support/provide incentives for network sharing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Include wholesale access obligations, e.g. MVNO access, national roaming obligations in spectrum licences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
No specific measures are necessary	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify

Please provide a justification for your answer to the previous question and describe the impact of the different solutions discussed on competition, investment and consumer welfare.

If you consider that wholesale access obligations should be imposed in spectrum licences in cases where there is a risk of an impediment to effective competition at retail level, how should this be imposed?

- ☐ Obligation on all spectrum holders
☐ Obligation attached to specific lots
☐ Case by case

Please justify your answer and describe to what extent you consider that an obligation to provide wholesale access might affect willingness to pay for specific lots, and if so, in which circumstances

Under the EEC, market shaping measures may be adopted by SMAs only after a forward-looking assessment of market competitive conditions following a procedure which should take into account the market analysis procedure of Art. 67(2) EEC. In your view, to what extent has the current requirement relating to the assessment of competitive conditions been effective in?

	1- Ineffective	2	3	4	5	6	7	8	9 - Most effective
Supporting investment and sustainable competition in mobile markets	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Ensuring that approaches taken by SMA regarding market shaping measures are consistent	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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As an alternative to the current approach, which is described in the previous question, should the DNA establish a more elaborated process for market analysis with conditions in EU law that Spectrum Management Authorities need to follow when assigning spectrum?

This could, for example, refer to the need to take into account viability of investments in view of the envisaged market structure (in relation to measures affecting infrastructure duplication) and to the need to consider measures to foster service competition in the event that the resulting market structure would not support effective competition at the retail level.

- ☐ Yes
- ☐ No
- ☐ No opinion

Please elaborate your answer, and if appropriate provide further insights regarding factors that you consider should be taken into account by Spectrum Management Authorities in the context of spectrum assignment procedures.

What measures could be imposed to support a more harmonised approach to the application of market shaping measures?

If you consider that the existing regime does not adequately ensure consistency when it comes, for instance, to the application of market shaping measures in spectrum awards or other auction conditions, would a review by the European Commission or another EU body of any competition analysis supporting the introduction of market shaping measures in auctions increase consistency?

- ☐ Yes
- ☐ No
- ☐ No opinion

In your view, which of the following intervention possibilities would have the most impact in ensuring consistency?

	1-limited impact	2	3	4	5	6	7	8	9-significant impact
Opinion	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Comments letter	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Veto decision	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify





































Section 6: Mobile and wireless services/ spectrum

Innovation

Promoting innovation is a key objective of the EECC. Measures which have the potential to promote innovation include spectrum sharing, for example through local licensing and experimental licences.

Please indicate which measures would be the most effective in enabling wider access to spectrum and boosting innovation:






















	1 - Costs significantly outweigh the benefits	2	3	4	5	6	7	8	9 - Benefits significantly outweigh the costs
Policies which result in greater use of spectrum sharing	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Policies which result in greater use of spectrum pooling	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Policies which result in greater use of spectrum trading	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Policies which impose a use-it-or-share-it-or-trade-it-or-lose-it condition in spectrum licences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promote flexibility in spectrum access to EU harmonised bands 1.(e. g non-MNO entities, local/temporary licences)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Policies which could result in the assignment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>






























of spectrum to wholesale network operators									
Coordinated assignment of spectrum for specific cross-border use cases / customer types (e.g. to multinational companies operating local networks)									
Policies which result in greater use of dynamic geolocation database systems									
Right of stakeholders to request the European Commission to start a harmonised allocation process (i.e. a petition for rule making)									
Other									

Please specify

For the measures ranked **7-9**, please choose what **benefits** are expected them.

	Greater harmonisation	Consumer benefits	More innovation (e.g. new services)	Cost savings	Improved competition	Increased investments	Wider coverage with VHCNs	Improved efficiency of decision-making	More efficient use of spectrum	Other
Policies which result in greater use of spectrum sharing	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policies which result in greater use of spectrum pooling	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policies which result in greater use of spectrum trading	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policies which impose a use-it-or-share-it-or-trade-it-or-lose-it	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

condition in spectrum licences										
Promote flexibility in spectrum access to EU harmonised bands 1.(e.g non-MNO entities, local /temporary licences)										
Policies which could result in the assignment of spectrum to wholesale network operators										
Coordinated assignment of spectrum for specific cross-border use cases / customer types (e.g. to multinational companies										

operating local networks)										
Policies which result in greater use of dynamic geolocation database systems										
Right of stakeholders to request the European Commission to start a harmonised allocation process (i.e. a petition for rule making)										
Other										

Please specify

Please further explain and quantify the identified benefits, if possible.

For measures ranked **1-3**, please explain why you consider they are **not beneficial**. If an additional burden is expected, please identify it and quantify, if possible.

	Not beneficial	Additional burden	Quantifying the additional burden
Policies which result in greater use of spectrum sharing			
Policies which result in greater use of spectrum pooling			
Policies which result in greater use of spectrum trading			
Policies which impose a use-it-or-share-it-or-trade-it-or-lose-it condition in spectrum licences			
Promote flexibility in spectrum access to EU harmonised bands 1.(e.g non-MNO entities, local/temporary licences)			
Policies which could result in the assignment of spectrum to wholesale network operators			
Coordinated assignment of spectrum for specific cross-border use cases / customer types (e.g. to multinational companies operating local networks)			
Policies which result in greater use of dynamic geolocation database systems			
Right of stakeholders to request the European Commission to start a harmonised allocation process (i. e. a petition for rule making)			
Other			

What would be the consequences, if any, of **not taking** any new measures to promote wider access to spectrum and boosting innovation?

Section 6: Mobile and wireless services/ spectrum

Sovereignty

This section considers whether the EECC should be enhanced to improve EU sovereignty in relation to access to the EU satellite market and to boost EU decision-making processes related to spectrum.

The satellite sector is subject to intensive investment, growth, innovation and industry and service competition, including between regions. Member States currently implement various approaches when allowing access to national satellite markets. Other third countries have more restrictive legislations imposing some kind of prior authorisation for access to their market. These fragmented approaches may undermine the EU's ability to adequately respond to new challenges.

Which of the following measures do you consider the most beneficial to harmonise approaches to access to EU market for satellite operators and enforcement?

	1-costs significantly outweigh benefits	2	3	4	5	6	7	8	9-benefits significantly outweigh costs
Single point of information for requirements for satellite authorisation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Greater consistency among Member States regarding requirements for satellite authorisations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Greater consistency among Member States regarding compliance/ enforcement frameworks for allowing satellite constellations' access to the EU market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Action at the EU-level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
No measures are necessary	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For the measures ranked 7-9, What would be the **added value/ benefits** for **satellite operators**?

	Reduced financial costs and administrative burden for NRAs	Reduced financial cost and administrative burden for operators	More efficient decision-making	Improved access to satellite services for users	Limit risk of forum shopping	Ensure level playing field between all operators aiming to access	Improved management of potential harmful interference	More innovation (e.g. new services)	Increased investments in the satellite sector	Other [specify below]	No added value/ benefits
Reduced financial costs and administrative burden for NRAs	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reduced financial cost and administrative burden for operators	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
More efficient decision-making	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improved access to satellite services for users	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Limit risk of forum shopping	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Ensure level playing field between all operators aiming to access	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Improved management of potential harmful interference	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
More innovation (e. g. new services)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Increased investments in the satellite sector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Other (specify)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
No added value/ benefits	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please specify

For the measures ranked 7-9, please further explain and quantify the benefits, if possible.

	Explanation benefits	Quantifying the benefits
Single point of information for requirements for satellite authorisation		
Greater consistency among Member States regarding requirements for satellite authorisations		
Greater consistency among Member States regarding compliance/ enforcement frameworks for allowing satellite constellations’ access to the EU market		
Action at the EU-level		

For the measures ranked **1-3**, please explain why you consider that these measures would **not be beneficial**. If an additional burden is expected, please identify it and quantify, if possible.

	Explanation not beneficial	Additional burden	Quantifying the additional burden
Single point of information for requirements for satellite authorisation			
Greater consistency among Member States regarding requirements for satellite authorisations			
Greater consistency among Member States regarding compliance/ enforcement frameworks for allowing satellite constellations' access to the EU market			
Action at the EU-level			

Section 6: Mobile and wireless services/ spectrum

Sovereignty

The Radio Spectrum Decision of 2002 allows the Commission to adopt implementing decisions to designate frequency bands at the EU level under harmonised technical conditions, with regard to the availability and efficient use of spectrum for the proper functioning of the single market. To this end, the Commission may issue mandates to the European Conference of Postal and Telecommunications Administrations (CEPT) for the preparation of such harmonising implementing measures.

The European Commission and national spectrum regulators work closely together to develop common rules. To assist the Commission in developing and implementing EU-level spectrum policy, two complementary bodies of national experts have been set up:

- The Radio Spectrum Policy Group (RSPG) as a high-level strategic advisory group.
- The Radio Spectrum Committee (RSC) provides assistance and issues regulatory opinions in adopting Commission implementing decision on spectrum harmonisation.

The European Commission, in collaboration with Member States, coordinates harmonisation of radio spectrum at EU level to ensure effective use and reduce interference. Do you consider that the harmonisation method has worked well so far?

- ☐ Yes
- ☐ No
- ☐ No opinion

What has been its main added value?



















Have there been shortcomings in the spectrum harmonization process you would like to signal or elements that can be improved in the harmonization process?

- ☐ Yes
- ☐ No

Please explain your answer.

Which of the measures would be most beneficial in increasing EU sovereignty in issues related to security or technology sovereignty?

	1-Costs significantly outweigh benefits	2	3	4	5	6	7	8	9-Benefits significantly outweigh costs

Coordination between Member States before going to CEPT									
In exceptional strategic cases, instead of CEPT, rely on an ad hoc/ high-level group consisting only of EU Member State representatives, as a safety net									

For the measures ranked **7-9**, please choose what **benefits** you expect.

	Greater sovereignty around spectrum management	Improved coordination and cooperation among EU Member States	Improved regulatory consistency in the EU	Improved efficiency of decision-making	Improved accountability and transparency of spectrum management	More efficient use of spectrum	Improve cybersecurity	improve control of MS on their communications, improve single market	Other (specify below)
Coordination between Member States before going to CEPT	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
In exceptional strategic cases, instead of CEPT, rely on an ad hoc/ high-level group consisting only of EU Member State representatives, as a safety net.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please specify

Which measures would be the most effective in *increasing EU sovereignty in cases of harmful interference from outside the EU?*

	1 - Ineffective	2	3	4	5	6	7	8	9 - Most effective
Enhance coordination among Member States vis-à-vis 3rd countries that cause harmful interferences	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Coordinate through RSPG the response to harmful interferences caused by 3rd countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Coordinated EU-level response to harmful interference caused by 3rd countries	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For the measures ranked **7-9**, please choose what **benefits** you expect.

	Greater sovereignty around spectrum management	Improved coordination and cooperation among EU Member States	Improved regulatory consistency in the EU	Improved efficiency of decision-making	Improved accountability and transparency of spectrum management	More efficient use of spectrum	Improve cybersecurity	Improve control of MS on their communications, improve single market	Other (specify below)
Enhance coordination among Member States vis-à-vis 3rd countries that cause harmful interferences	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coordinate through RSPG the response to harmful interferences caused by 3rd countries	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Coordinated EU-level response to harmful	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

interference caused by 3rd countries									
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Please specify

For the measures ranked **7-9**, please further explain and quantify the identified **benefits**, if possible.

	Benefits	Quantifying the benefits
Enhance coordination among Member States vis-à-vis 3rd countries that cause harmful interferences		
Coordinate through RSPG the response to harmful interferences caused by 3rd countries		
Coordinated EU-level response to harmful interference caused by 3rd countries		

What would be the consequences of not taking any new measures to increase EU sovereignty in spectrum management?

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Section 6: Mobile and wireless services/ spectrum

Establishing goals

Art. 3(2)(a) EECC establishes an objective to “promote connectivity, access to and take-up of very high capacity networks... including mobile and wireless networks by all citizens and businesses of the Union”. Is the current concept of “very high capacity network” as it relates to mobile and wireless networks still relevant, or should it be redefined in light of technological and market developments?

- ☐ Current concept of VHCN is still relevant for mobile / wireless – no need for amendment
- ☐ Current concept of VHCN is no longer relevant for mobile / wireless and should be amended
- ☐ No opinion

What changes would you propose?

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Should Member States be required to establish a national plan for the achievement of future mobile and wireless services goals?

- ☐ Yes
- ☐ No
- ☐ No opinion

Section 7: Access-related provisions

Updating the definition of Very High Capacity Networks (VHCN)

The current definition of Very High Capacity Networks (VHCN) in Art 2(2) EECC refers to an electronic communications network which consists wholly of fibre (or a network with equivalent capabilities) up to at least the distribution point, but is silent about connectivity beyond the distribution point. Taking into account that the Decision establishing the Digital Decade Policy Programme (Art. 4(2) establishes a target regarding coverage by a gigabit network up to the Network Termination Point (NTP) and that the Gigabit Infrastructure Act (GIA) includes obligations (Art. 10) to deploy in-building fibre in new build or major renovation works, and that copper switch-off will require the replacement of in-building copper with an alternative that supports VHCN connectivity, it may be relevant to consider updating the definition of VHCN in the EECC. What would be the relative benefits in comparison to costs of the following options in your view?

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	1 - Costs significantly outweigh benefits	2	3	4	5	6	7	8	9 - Benefits significantly outweigh costs
Update the definition of Very High Capacity Networks (VHCN) to include not only fibre to the distribution point / NTP but also in-building fibre or connectivity with equivalent capabilities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Amend Art 10 GIA to provide for standardisation of in-building fibre when fibre is deployed to existing buildings, noting that currently standards are required only for new buildings or buildings subject to major renovation works	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Amend Art 10 GIA to note that standards should be defined up to the relevant distribution point outside the building if obligations for access at such a point have been established in the context of Art 61 (3) EECC?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain your response to the previous question and the implications for benefits and costs with quantification where feasible.

Section 7: Access-related provisions






Copper switch-off

Data gathered in the context of the studies conducted for the Commission regarding the review of the EECC / DNA suggests that low take-up of fibre is a problem in some countries and that uncertainty around how long there will be parallel operation of copper networks may also be limiting investment in fibre, as the business case for fibre depends on high take-up rates that can be undermined when copper is retained. Do

you consider that a concrete plan for copper switch-off would speed up the deployment of fibre or alternatives (such as suitably dimensioned 5G Fixed Wireless Access), in particular in less dense areas where deploying and operating parallel infrastructures for fixed connectivity is not viable? What would be the impact in your view of the following options for copper switch-off on the deployment and take-up of fibre?

For each of the following options, please indicate how effective you consider it is likely to be in supporting the EU's progress towards a gigabit connectivity target.

	No or negative effect	Minor increase in Gigabit connectivity	Some increase	Significant increase	Full fibre and equivalent coverage resulting from the measure concerned
Non-binding target date for copper switch-off of 2030 included in soft law e.g. in an EC Recommendation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Non-binding target date for copper switch-off of 2030 included in legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Binding target date of 2030 for copper switch-off in legislation with an exception for areas not fully covered by a fibre network.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Binding target date of 2030 for copper switch-off in legislation with an exception for areas not fully covered by a fibre network or a network offering capabilities equivalent to fibre.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Binding target date of 2030 included in legislation with an exception for areas linked to coverage of FTTH and which do not have any alternative broadband access network with a minimum level of capabilities reaching e.g. 100Mbit/s.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Binding requirement included in legislation for copper switch-off linked to a specified level of fibre coverage (e.g. 90% or 95%) in a given area	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Binding requirement included in legislation for copper switch-off linked to specified coverage of fibre or other broadband access with equivalent capabilities (e.g. of 90% or 95%) in a given areas					
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Please describe the benefits and costs (including any possible unintended effects) associated with each of the options for society as a whole including consumers, SMEs and larger businesses and for different actors providing telecom services such as former incumbent operators, wholesale only or other regional fibre investors, access seekers.

	Costs	Benefits
Non-binding target date for copper switch-off of 2030 included in soft law e.g. in an EC Recommendation		
Non-binding target date for copper switch-off of 2030 included in legislation		
Binding target date of 2030 for copper switch-off in legislation with an exception for areas not fully covered by a fibre network.		
Binding target date of 2030 for copper switch-off in legislation with an exception for areas not fully covered by a fibre network or a network offering capabilities equivalent to fibre.		
Binding target date of 2030 included in legislation with an exception for areas linked to coverage of FTTH and which do not have any alternative broadband access network with a minimum level of capabilities reaching e.g. 100Mbit/s.		
Binding requirement included in legislation for copper switch-off linked to a specified level of fibre coverage (e.g. 90% or 95%) in a given area		
Binding requirement included in legislation for copper switch-off linked to specified coverage of fibre or other broadband access with equivalent capabilities (e.g. of 90% or 95%) in a given areas		

Do you consider that it would be justified to amend the conditions for copper switch-off as set out in Art 81 EEC regarding copper to fibre migration?

- ☐ Yes
☐ No
☐ No opinion

Which of the following changes should be made?

- ☐ Removing the linkage between migration conditions and an SMP finding, and instead basing it on ownership of a copper network
☐ Adding requirements relating to transparency
☐ Adding requirements relating to non-discrimination (i.e. equivalent treatment in areas where an alternative operator has deployed fibre)
☐ Clarifying that switch-off may occur when there is availability of alternative technologies / wholesale solutions from any provider
☐ Other

Please specify

Please elaborate your response and provide justification and any evidence

Section 7: Access-related provisions

Replicability of fixed networks and implications for the future need for access regulation

As of 2024, the data shows that while some premises, especially those in very dense areas are served with three or more parallel VHCN networks, most premises are served by only one or two distinct fixed access network infrastructures. Looking forward to 2035, when the switch-off of copper networks should be complete, what % of households do you consider will be served by:

	<10%	10-20%	20-30%	30-40%	40-50%	More than 50%
Only 1 fibre infrastructure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
At least two fibre infrastructures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Three or more fibre infrastructures	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Note when answering the previous question you should take into account economies of scale involved in the deployment of fixed access infrastructure as well as potential cost reductions that might be achievable by using the Gigabit Infrastructure Act (GIA) but not any measures that might be applied regarding

wholesale access under the EECC. As this question asks about distinct infrastructures / separate deployments, co-investment should not be taken into account.

Bearing in mind possible limitations on the replicability of fixed very high capacity fixed access infrastructure, do you consider that it will be necessary for the future DNA to include provisions regarding wholesale access?

- ☐ Yes – there should be some provision made in the DNA for wholesale access provisions
- ☐ No – all existing provisions regarding SMP access regulation and Symmetric access under Art 61(3) should be removed in a future DNA and reliance should be placed on the GIA and competition law instead
- ☐ No opinion

If you consider that it will be necessary for the future DNA to include provisions regarding wholesale access, what types of wholesale access should be covered?

- ☐ Strict regulation of access to ducts and poles of operators with market power i.e. access obligations which go beyond those set out in the Gigabit Infrastructure Act (GIA)
- ☐ The potential for NRAs to mandate other forms of fixed wholesale access in the local access network and potentially beyond such as physical or virtual fibre unbundling or access to terminating segments of leased lines?
- ☐ Other

Please specify

If you consider that it will be necessary for the future DNA to include provisions regarding wholesale access, why do you consider that removing all wholesale access provisions in a future DNA would have negative impacts?

- ☐ Difficulties for operators to make investments e.g. in fibre networks and services
- ☐ Disruption arising from a change in the rules undermining certainty for investors
- ☐ Reduction in competition impacting consumers
- ☐ Challenges for operators to deploy services nationwide
- ☐ Challenges for operators to provide cross-border services e.g. to businesses
- ☐ Challenges for operators to enter and provide services in other European markets
- ☐ Challenges to obtain widespread duct and pole access on fair terms under the GIA
- ☐ Challenges to make use of competition law for the purposes of obtaining wholesale access where needed
- ☐ Other

Please explain

Why do you consider that no provisions on wholesale access will be needed under the DNA?

- ☐ Access regulation would undermine incentives to invest in VHCN
- ☐ GIA is sufficient to support access to ducts and poles and to enable infrastructure competition on this basis
- ☐ Access issues can be handled under competition law
- ☐ Multiple service providers are not necessary to meet end-user needs
- ☐ Commercial wholesale access arrangements will ensure that consumers have an adequate choice

☐ Other

Please explain

Section 7: Access related provisions

Thresholds for access regulation

The current provisions are SMP regulation via a market analysis (Art. 67 and associated articles) and/or symmetric regulation under Art. 61(3) EEC. It should be noted in this context that under the existing rules, the SMP regime remains the key instrument for ex ante regulation. The current regime requires NRAs to analyse relevant markets included in the Recommendation on Relevant Markets considered susceptible to ex ante regulation and a requirement for NRAs to conduct the three criteria test when proposing regulation in markets not included in the list set out in the Recommendation on Relevant Markets. Regulatory intervention can be also envisaged outside of the SMP regime under the specific conditions set in Article 61 (3) through so-called symmetric regulation, but this is typically viewed as subsidiary to SMP regulation as the introduction of access obligations under article 61(3) is optional. while there is a requirement for NRAs to review markets included in the Relevant Market Recommendation.

Regarding existing provisions on “symmetric” regulation under article 61(3), it should be noted that access obligations under this provision do not apply to all operators in general but rather typically to a single operator (monopolist on fibre in a given area) who deploys wiring inside a building or **up to the first distribution point** in a given area or building in situations where **duplication of such wiring would be economically inefficient or physically impractical**. Additional criteria must be met when mandating access beyond the first distribution point. This provision (beyond the first distribution point) has not been used in practice.

- ☐ Yes retain the current system of SMP (Art 67 and associated articles) and symmetric regulation relating to wiring (Art 61(3)) unchanged
- ☐ No wholesale access provisions may still be needed under the DNA but changes are necessary to the threshold
- ☐ Not relevant because access provisions are not necessary
- ☐ No opinion

With reference to the response given above, what do you see as the benefits of the existing approach, and what are the drawbacks / unintended consequences? Will this approach remain relevant on a forward-looking basis?

How would you rate the respective benefits in comparison with costs of the following options?

	1 - Costs significantly outweigh benefits	2	3	4	5	6	7	8	9 - Benefits significantly outweigh costs

Retain the existing system whereby SMP regulation is the mainstay of ex ante regulatory intervention, and NRAs are required to analyse markets listed in a Recommendation on Relevant Markets and impose access obligations where they find SMP. Access obligations in other markets can be imposed but only if the 3 criteria test is passed. Symmetric obligations under article 61(3) remain as a complement (for in-building wiring) and/or as an alternative to SMP for specific types of access regulation (access to the terminating segment), but remain optional for NRAs.									
Replace both SMP-based regulation and the symmetric provisions (article									
Replace both SMP-based regulation and the symmetric provisions (article 61(3) with an alternative bottleneck concept whereby “bottleneck” regulation could be triggered if access is									
Remove the SMP provisions and instead rely entirely on GIA complemented by Article 61(3) as it is now (see description of this article above).									

<p>Remove the SMP provisions and instead rely entirely on GIA and Article 61(3) with amendments to reduce the burden of proof in relation to Article 61(3). For example, amend article 61(3) so that access may be mandated where replicability would be economically inefficient or physically impractical and extend this threshold so that this same burden of proof also applies for access at points beyond the first distribution point as well as potentially to active access, in cases where passive access would not be feasible</p>									
<p>Remove the markets from the Relevant Market Recommendation, and instead require NRAs to periodically gather retail and wholesale data and conduct market analyses first at retail, and then if necessary at wholesale level. Specifically, in cases where relevant retail markets for fixed broadband and mobile connectivity (for the provision of services to consumers, SMEs and enterprises) would not otherwise be effectively competitive in the absence of ex ante wholesale obligations under the EECC (and after taking into account provisions under the GIA), NRAs would be</p>									

required to apply access obligations under the EECC based on an assessment of the 3CT and SMP finding and/or under art 61(3) (for cases where replicability would be economically inefficient or physically impractical) as appropriate. In other cases, regulation would be required to be removed									
Retain SMP regulation but as a safeguard mechanism, always requiring the three criteria test, under the assumption that competition problems would by default, normally be addressed by existing symmetric regulations, in particular GIA, but also potentially article 61(3) unamended	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Replace the existing SMP and Article 61(3) provisions with a broader obligation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What would be the implications of the different options described above on competition and investment, for NRAs, consumers, businesses and different actors in the telecom market?

Do you have alternative suggestions regarding any changes to the threshold for ex ante access regulation? If so please describe, and explain why these would be more effective than the current regime or other options described above.

Do you consider that the EECC tackles cases where there may be competition problems associated with **tight oligopolies** effectively?

- ☐ Yes the existing access regime effectively addresses cases where there may be competition problems associated with tight oligopolies
- ☐

No the existing access regime does not effectively address cases where there may be competition problems associated with tight oligopolies

- ☒ The question is not relevant because tight oligopolies do not lead to competition concerns or concerns can be addressed via competition law

What approach do you think would be most appropriate to identify tight oligopolies that might give rise to competition concerns and establish which operator(s) should be subject to access obligations in this case?

	1 - Costs significantly outweigh benefits	2	3	4	5	6	7	8	9 - Benefits significantly outweigh costs
By maintaining the concept of single SMP but replacing the concept of joint SMP with a concept linked to Significant Impediment to Effective Competition (SIEC) under Merger Control	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>
By maintaining the concept of single SMP but replacing the concept of joint SMP with a concept linked to "Economic Dependence" as found in some applications of competition law at national level	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>
By maintaining the concept of single SMP but replacing the concept of joint SMP with a "gap assessment" i.e. Assessment that the retail market would not be competitive in the absence of ex ante regulation, and there is no single SMP. Access obligations could then be applied on operators meeting a minimum market share threshold.	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>	<input checked="" type="radio"/>
By moving away entirely from the SMP (and joint SMP) concept and									

instead applying obligations on all operators to meet fair and reasonable requests for access	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
By elaborating on the threshold established under article 61(3) – that replicability would be economically inefficient or physically impractical - so that it could apply in cases where there are two networks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What would be the implications of the different options described above on competition and investment, for NRAs, consumers, businesses and different actors in the telecom market?

Do you have alternative suggestions regarding any changes to the threshold that could be applied to assess whether access obligations should be applied in the case of tight oligopolies? If so please describe, and explain why these would be more effective than the current regime or other options described above.

Do you consider that the same market analysis process and threshold should be used to assess whether access obligations should be applied in the case of fixed and mobile infrastructures, noting that access obligations in the case of mobile are often applied in the context of spectrum licenses?

- ☐ Yes - The same market analysis process and threshold should be used to assess the need for access obligations to be applied to mobile as to fixed infrastructure including when access obligations are applied in the context of spectrum licences
- ☐ Partly - The same market analysis process and threshold should be used to assess the need for access obligations to be applied to mobile wholesale markets (outside of a licensing procedure) as to fixed wholesale markets but a different process can be applied when it comes to access obligations imposed in the context of spectrum licences
- ☐ No – Different thresholds should always be used to assess the need for access obligations to be applied to mobile as to fixed infrastructure
- ☐ No opinion

Please explain the rationale for your answer and elaborate your proposal, if different from those described above

Section 7: Access-related provisions

Common specifications for wholesale products

Differing wholesale product specifications within the same country and across Europe can complicate the process of providing services nationwide or (for businesses) on a pan-European basis. Data gathered in the context of the studies also shows that there is relatively limited availability of fibre unbundling and that the specifications of active wholesale products may not always allow access seekers to differentiate their offers. This contrasts with the copper environment where there were standard products such as copper unbundling and standardised specifications for leased lines EU-wide. Is there a case to provide guidance regarding the characteristics of fixed wholesale access products in order to support competition and innovation nationwide and (where relevant) cross-border via the use of these products?

- ☐ Yes
- ☐ No
- ☐ No opinion

What would be the relative benefits compared with costs of the following options

	1 - Costs significantly outweigh benefits	2	3	4	5	6	7	8	9 - Benefits significantly outweigh costs
EC Recommendation regarding best practice specifications for wholesale access products	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Legislative requirement that any wholesale access obligations imposed e.g. on the basis of SMP regulation, State Aid, competition law remedies should take into account best practice wholesale product specifications to be developed by EC and /or BEREC.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requirement that all operators should make available on reasonable request a given minimum set of wholesale access products identified by the EC and/or BEREC. This option would be applied in tandem with an obligation that all	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

operators should meet reasonable requests to offer wholesale access on fair and reasonable terms and conditions.									
--	--	--	--	--	--	--	--	--	--

In the event that best practice / standardised specifications for wholesale access products are developed, which of the following products should be included?

- ☐ FTTH unbundling
- ☐ FTTH VULA
- ☐ Bitstream (not meeting VULA specifications)
- ☐ Ethernet Leased Lines
- ☐ Business-grade SLA / SLG and associated KPIs
- ☐ Other

Please specify

What would be the impact of establishing standardised characteristics for these products? To which establishing standardised characteristics would be effective in achieving the following aims?

	1 - Ineffective or harmful	2	3	4	5	6	7	8	9 - Most effective
Encouraging service provision in multiple EU countries to consumers or multi-national enterprises	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitating the provision of retail broadband services in national markets characterised by different wholesale access providers and potentially different legal bases for regulation e.g. SMP, State Aid	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitating differentiated services / innovation – in particular in the event that specifications for FTTH unbundling and VULA are included	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

What would be the impact of such a provision on stakeholders including consumers, SMEs, larger businesses and different types of telecom provider (operators subject to access regulation, access seekers specialising in mass-market broadband, access seekers providing business services, wholesale only providers, NRAs)?

Section 7: Access-related provisions

Potential areas to improve coherence and strengthen effectiveness of the access measures

Art. 72 EEC (Access to civil engineering) encourages NRAs to mandate access to ducts and poles in cases where SMP has been found in a market which does not directly include ducts and poles within the scope of the market definition. This provision has been widely used to mandate access to SMP ducts and poles. However, in cases where SMP duct and pole access is widely taken up and used by access seekers to deploy fibre, it does not make sense any more to rely on the provision as set out in art 72 EEC because it prevents NRAs from taking into account the impact of duct and pole access (as an upstream remedy) on competition in the market in which SMP has been found (such as Wholesale Local Access or dedicated connectivity). There has thus been a trend for some NRAs to identify it as a separate (PIA) market. As a further challenge, once an operator has made use of SMP PIA to install fibre, it is not possible to switch to another duct network. Thus, there is dependency on this asset for the duration of the fibre investment.

How would you rate the following options in terms of their effectiveness in addressing this problem?

	1 - Ineffective or harmful	2	3	4	5	6	7	8	9 - Most effective
Maintaining the status quo i. e. retaining Art. 72 EEC without change, and thereby continuing to encourage the introduction of duct access obligations as a remedy under other wholesale markets e.g. relating to wholesale local access or dedicated connectivity	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Remove Art. 72 and instead require (via a legal obligation) or recommend (e.g. through the inclusion of a PIA market in the RRM) NRAs to assess a separate PIA market in the context of a periodic market analysis procedure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Maintain Art. 72 but amend to note that in the event that SMP PIA is likely to have a significant impact on downstream competition, then it should be assessed as a separate market	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Include a provision in the DNA that the operators of historic copper networks and /or operators that have previously been found to have SMP and have provided access to ducts and poles on the basis of SMP regulation should provide access to ducts and poles on the basis of cost-orientation and non-discrimination with provision for the EC or BEREC to provide guidelines on the terms and conditions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please elaborate your answer or explain what other measures might be appropriate to address the problem described

Section 7: Access-related provisions

Potential areas for simplification regarding access regulation

The following access provisions associated with SMP regulation have not been extensively used. Moreover, some stakeholders have highlighted concerns with their interpretation and possible unintended consequences in the context of interviews conducted for the access study. In the event that SMP regulation is retained, which of the following provisions could be removed?

In the event that they are removed, NRAs would then be asked to take the relevant factors into account (e. g. impacts on market dynamics of co-investment arrangements, wholesale only and voluntary separation) when conducting a market analysis without reference to a specific article establishing further rules.

- ☐ Article 76 Co-investment -Regulatory treatment of new very high capacity network elements
- ☐ Article 80 Wholesale only
- ☐ Article 77 Functional separation
- ☐ Article 78 Voluntary separation by a vertically integrated undertaking
- ☐ Others

Please specify



For those provisions that you consider can be removed, what would be the benefits associated with removing these provisions e.g. in terms of reduced bureaucracy / costs / increased regulatory certainty / effects on competition, consumer welfare and/or investment?

	Benefits of removing the provisions
Article 76 Co-investment -Regulatory treatment of new very high capacity network elements	
Article 80 Wholesale only	
Article 77 Functional separation	
Article 78 Voluntary separation by a vertically integrated undertaking	
Others	

For those provisions that you consider should remain, what would be the negative impacts associated with their removal? What changes could be made to these provisions to render them more effective / relevant?

	Negative impact of removing the provisions
Article 76 Co-investment -Regulatory treatment of new very high capacity network elements	
Article 80 Wholesale only	
Article 77 Functional separation	
Article 78 Voluntary separation by a vertically integrated undertaking	
Others	

Section 8: Environmental sustainability

The current legal framework for electronic communications predates EU policies such as the European Green Deal and the Green Deal Industrial Plan. This study aims to explore how to ensure the alignment between the various policies in the most effective manner.



Could there be benefits from introducing an environmental sustainability objective and/or provisions related to environmental sustainability in the legal framework for electronic communications?

- ☐ Yes
- ☐ No
- ☐ No opinion

Please explain your answer.

What would be the relative costs in relation to benefits of the following measures when it comes to addressing the current lack of alignment between the EECC and more recently introduced environmental targets and policies?

	1 - Costs significantly outweigh benefits	2	3	4	5	6	7	8	9 - Benefits significantly outweigh costs
The status quo with no explicit reference to sustainability within the objectives of the EECC or (with the exception of Art. 44) other provisions of the EECC	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introduction of a new environmental sustainability objective without other specific measures. Separately, the upcoming EU Code of Conduct for sustainable telecommunications networks is not integrated into the simplified EU Taxonomy for sustainable finance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introduction of a new environmental sustainability objective,									

with the only other specific measure to promote sustainability being the integration of the upcoming EU Code of Conduct for sustainable telecommunications networks into the simplified EU Taxonomy for sustainable finance									
Introduction of a new environmental sustainability objective and explicitly empowering NRAs to consider environmental sustainability in the context of and to gather environmental information limited to requirements triggered by these tasks. However, no link is made to, the upcoming EU Code of Conduct for sustainable telecommunications networks and it is not integrated into the simplified EU Taxonomy for sustainable finance									
Introduction of a new environmental sustainability objective and explicitly empowering NRAs to consider environmental sustainability in the context of and to gather environmental information limited to requirements triggered by these tasks. The upcoming EU Code of Conduct for sustainable telecommunications networks is integrated into the simplified EU Taxonomy for									

sustainable finance and a link to it is made in the legal framework for electronic communications.									
Introduction of a new environmental sustainability objective and explicitly empowering NRAs to consider environmental sustainability but beyond their specified regulatory tasks (broad mandate), to gather information on environmental impact from all ICT actors and to act on such information. However, no link to the upcoming EU Code of Conduct for sustainable telecommunications networks is made and it is not integrated into the simplified EU Taxonomy for sustainable finance									
Introduction of a new environmental sustainability objective and explicitly empowering NRAs to consider environmental sustainability but beyond specified regulatory tasks (broad mandate), to gather information on environmental impact from all ICT actors and to act on such information. The upcoming EU Code of Conduct for sustainable telecommunications networks is integrated into the simplified EU Taxonomy for sustainable finance and									

a link to it is made in the
legal framework for
electronic
communications

For the measures ranked 7-9, which specific **benefits** could result them and what **additional cost** do you expect to be associated with the measures you favour? Please **quantify** if possible.

	Benefits	Additional costs	Quantifying the additional costs
The status quo with no explicit reference to sustainability within the objectives of the EECC or (with the exception of Art. 44) other provisions of the EECC			
Introduction of a new environmental sustainability objective without other specific measures. Separately, the upcoming EU Code of Conduct for sustainable telecommunications networks is not integrated into the simplified EU Taxonomy for sustainable finance			
Introduction of a new environmental sustainability objective, with the only other specific measure to promote sustainability being the integration of the upcoming EU Code of Conduct for sustainable telecommunications networks into the simplified EU Taxonomy for sustainable finance			
Introduction of a new environmental sustainability objective and explicitly empowering NRAs to consider environmental sustainability in the context of and to gather environmental information limited to requirements triggered by these tasks. However, no link is made to, the upcoming EU Code of Conduct for sustainable telecommunications networks and it is not integrated into the simplified EU Taxonomy for sustainable finance.			
Introduction of a new environmental sustainability objective and explicitly empowering NRAs to consider environmental sustainability in the context of and to gather environmental information limited to requirements triggered by these tasks. The upcoming EU Code of Conduct for sustainable telecommunications networks is integrated into the simplified EU Taxonomy for sustainable finance and a link to it is made in the legal framework for electronic communications.			

Introduction of a new environmental sustainability objective and explicitly empowering NRAs to consider environmental sustainability but beyond their specified regulatory tasks (broad mandate), to gather information on environmental impact from all ICT actors and to act on such information. However, no link to the upcoming EU Code of Conduct for sustainable telecommunications networks is made and it is not integrated into the simplified EU Taxonomy for sustainable finance.			
Introduction of a new environmental sustainability objective and explicitly empowering NRAs to consider environmental sustainability but beyond specified regulatory tasks (broad mandate), to gather information on environmental impact from all ICT actors and to act on such information. The upcoming EU Code of Conduct for sustainable telecommunications networks is integrated into the simplified EU Taxonomy for sustainable finance and a link to it is made in the legal framework for electronic communications.			

For the measures ranked 1-3, what **adverse effects** do you expect from them and **why**? Please **quantify** any **additional costs** to your organisation if possible.

	Adverse effects	Reason for the effect	Quantifying the additional costs
The status quo with no explicit reference to sustainability within the objectives of the EECC or (with the exception of Art. 44) other provisions of the EECC			
Introduction of a new environmental sustainability objective without other specific measures. Separately, the upcoming EU Code of Conduct for sustainable telecommunications networks is not integrated into the simplified EU Taxonomy for sustainable finance			
Introduction of a new environmental sustainability objective, with the only other specific measure to promote sustainability being the integration of the upcoming EU Code of Conduct for sustainable telecommunications networks into the simplified EU Taxonomy for sustainable finance			
Introduction of a new environmental sustainability objective and explicitly empowering NRAs to consider environmental sustainability in the context of and to gather environmental information limited to requirements triggered by these tasks. However, no link is made to, the upcoming EU Code of Conduct for sustainable telecommunications networks and it is not integrated into the simplified EU Taxonomy for sustainable finance.			
Introduction of a new environmental sustainability objective and explicitly empowering NRAs to consider environmental sustainability in the context of and to gather environmental information limited to requirements triggered by these tasks. The upcoming EU Code of Conduct for sustainable telecommunications networks is integrated into the simplified EU Taxonomy for sustainable finance and a link to it is made in the legal framework for electronic communications.			

Introduction of a new environmental sustainability objective and explicitly empowering NRAs to consider environmental sustainability but beyond their specified regulatory tasks (broad mandate), to gather information on environmental impact from all ICT actors and to act on such information. However, no link to the upcoming EU Code of Conduct for sustainable telecommunications networks is made and it is not integrated into the simplified EU Taxonomy for sustainable finance.			
Introduction of a new environmental sustainability objective and explicitly empowering NRAs to consider environmental sustainability but beyond specified regulatory tasks (broad mandate), to gather information on environmental impact from all ICT actors and to act on such information. The upcoming EU Code of Conduct for sustainable telecommunications networks is integrated into the simplified EU Taxonomy for sustainable finance and a link to it is made in the legal framework for electronic communications.			

Please provide examples of the type of regulatory tasks in which NRAs should consider environmental sustainability.

What type of environmental information would be necessary to fulfil these?

Do you see a need for a wider cross-industrial collaboration to promote environmentally sustainable use of networks (e.g. via traffic optimisation, codecs, etc)?

- ☐ Yes
☐ No
☐ No opinion

Please explain why, in your view, no benefits would result from adding an environmental sustainability objective and/or provisions related to sustainability in the legal framework for electronic communications.

What would be the consequences of not taking any new measures related to environmental sustainability in the legal framework for electronic communications?

Section 9: Universal services

The Universal service obligations (USO) in the European Electronic Communications Code (EECC) provide a social safety net that seeks to support the availability, affordability and accessibility of basic electronic communications services. However, other horizontal measures such as State aid measures, the provision of Services of General Economic Interest or social welfare contributions, could in principle be used to address the same objectives.

Do you consider that the universal service provisions could be completely withdrawn from the EECC without undermining the underlying objectives which they set out to achieve?

- ☐ Yes, the USO provisions could be withdrawn
☐ No, the USO provisions should not be withdrawn
☐ No opinion

Please elaborate your answer and provide examples of the alternative measures that could be taken to address the objectives currently guaranteed by the universal service obligations

Could you provide an indication of what costs and resources would be saved from within your organisation (in absolute terms or FTE), taking into account administrative costs, revenues and contributions (when applicable), if the universal service obligations were withdrawn.

Information gathered by the study team suggests that there is limited use of the USO **availability** provisions in Member States because end-users' needs for safety net broadband solutions are typically met by commercial means, or will be addressed through public funding. Options may be either to remove this provision (regarding availability) or to update it in way that would mean that it may be relevant in more cases. What do you consider are the relative costs and benefits of the following options?

	1 - Costs significantly outweigh benefits	2	3	4	5	6	7	8	9 - Benefits significantly outweigh costs
Maintain the status quo	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Phase-out of existing (optional) provisions in the EECC regarding availability of adequate broadband	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Extend the definition of adequate broadband so that it more closely matches the targets established in the Digital Decade policy programme	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please elaborate your response and provide quantitative evidence where possible of the costs and benefits that might be associated with each of these options.

Information gathered by the study team suggests that the provisions relating to **affordability** of adequate broadband are used in some cases, but can be costly to apply and in many cases have limited take-up. If the costs are met by the industry, this could result in excessive burdens. What would be your preferred option when comparing the relative benefits compared with costs?

	1 - Costs significantly outweigh benefits	2	3	4	5	6	7	8	9 - Benefits significantly outweigh costs
Maintain the status quo without any changes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Phase-out of existing provisions in the EECC regarding affordability and address affordability solely through social welfare system									
Maintain the existing scope of provisions and update the definition of adequate broadband to align with the Digital Decade targets/ VHCN									
Update adequate broadband definition by updating Annex V to reflect forward-looking use cases (falling short of VHCN) while providing more guidance on the relation between adequate broadband and broadband speeds enjoyed by the majority with aim of highlighting the role of universal service as a safety net									
Maintain the current rule of limiting affordability measures to consumers with low income, or special social needs (including those in remote areas for whom a connection is available but not affordable) and ensuring support to consumers with disabilities. Clarify that the provisions should be used only where other public policy tools (measures such as vouchers or social allowances), would not address objectives									
Remove SMEs and not-for-profit organisations from the (optional)									

scope of the affordability provisions									
Remove the option of an industry fund (so that any unfair burden would need to be met from public funds)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please elaborate your response and provide quantitative evidence where possible of the costs and benefits that might be associated with each of these options.

The current EECC allows the use of industry funds to finance the costs of universal service provision (availability if implemented and affordability). Do you think that this option should be kept?

- ☐ Yes, maintain the status quo including the option of an industry fund
- ☐ No, remove the option of an industry fund (so that any unfair burden would need to be met from public funds)
- ☐ No opinion

Please elaborate your response and provide quantitative evidence where possible of the costs and benefits that might be associated with each of these options.

Section 10: End-user protection

This study aims to explore whether the effectiveness and benefits of the end-user protection rules can be streamlined and simplified to reduce administrative burden for operators while strengthening protection for consumers in key areas.

Streamlining consumer protection provisions

In your view, are there examples at national level of the end-user rights rules that go beyond or fall short of the end-user protection measures set in the EECC? Please provide examples if available.

What is the maximum contractual commitment period in your country (Art 105(1) EECC)? Please indicate in number of months.

Only values of at least 0 are allowed

What is the average duration of consumer contracts (in other words, how long on average does a consumer maintain a contract)? Please indicate in number of months.

Only values of at least 0 are allowed

Member States can apply certain end-user provisions scoped to consumers to microenterprises, small enterprises or not-for-profit organisations (Arts. 102(2), 105(2), 107(4) EEC). Has this been done in your country?

- ☐ Yes
- ☐ No

Could you provide an example of (or a link to) a contract summary in your country?

Are the EEC provisions that extend certain end-user rights beyond consumers to also cover all other end-users, including **businesses**, beneficial?

- ☐ Yes
- ☐ No
- ☐ No opinion

Please explain the benefits resulting from keeping such provisions.

Please explain why such provisions are not beneficial in your view.

Are the **sector specific pre-contractual information** requirements in the EEC (Art. 102 and Annex VIII EEC) which on the requirements in horizontal consumer rules beneficial?

- ☐ Yes
- ☐ No
- ☐ No opinion

Please explain what benefits result from these provisions. Provide evidence and examples if available.

	Benefits	Evidence of benefits	Examples of benefits
Answer here			

Please explain why such provisions are not beneficial in your view. Provide evidence and examples if available.

	Not beneficial	Evidence not beneficial	Examples why provisions not beneficial
Answer here			

Is the obligation of Art. 105(3) EECC that requires providers to offer end-users the best tariff information (at least annually and after automatic prolongation) beneficial?

- ☐ Yes
- ☐ No
- ☐ No opinion

Please explain what benefits result from keeping this obligation.

Please explain why this obligation is not beneficial in your view.

Is the provision (Art. 103 and Annex IX EECC) requiring National Regulatory Authorities to ensure that providers of internet access and interpersonal communications services, which make their services subject to terms and conditions, publish certain related information beneficial?

- ☐ Yes
- ☐ No
- ☐ No opinion

Please explain what benefits result from this obligation.

Please explain your answer and indicate potential costs/ burdens.

	Explain your answer	Potential costs burdens
Answer here		

Is the provision (in Art. 103 EECC) that requires NRAs to ensure that end-users have access to an independent comparison tool free-of-charge beneficial?

- ☐ Yes
- ☐ No
- ☐ No opinion

Please explain what benefits result from this obligation.

Should this obligation also cover bundled offers?

- ☐ Yes
- ☐ No
- ☐ No opinion

Please explain your answer. Please also explain how qualitative difference – e.g. in terms of content offered – could be compared.

	Explanation of the answer	Comparison of qualitative differences
Answer here		

Please explain why this obligation is not beneficial and identify potential costs/ burdens.

	Explanation of the answer	Potential costs/ burdens
Answer here		

Is the required **contract summary** beneficial to end-users?

- ☐ Yes
- ☐ No
- ☐ No opinion

Please explain your answer.

The provisions concerning access to emergency communications (Art. 109 EECC) have been transposed by Member States, but further implementation is needed to ensure effective access to emergency services. The Commission's 112 implementation report shows that diverging national solutions are implemented with regard to caller location criteria and access to emergency services for end-users with disabilities.

Do you consider that more harmonisation with regard to emergency communications is needed?

- ☐ Yes
- ☐ No
- ☐ No opinion

Please explain the areas where you would see benefits from more harmonisation

Do you have views on the benefits of the **EECC's accessibility** provisions for the electronic communications sector?

Regarding the list of **additional facilities** specified in Art. 115 EECC, are the facilities listed in Annex VI beneficial to end-users?

- ☐ Yes
- ☐ No
- ☐ No opinion

Please explain your answer signifying which facilities in particular are beneficial (are some more beneficial than others?). Should there be an obligation for providers to provide some or all of the facilities to consumers free of charge?

	Explanation answer	Beneficial facilities (are some more beneficial)	Obligation provide facilities free of charge
Answer here			

Please explain why the facilities are not beneficial in your view. Are some less beneficial than others?

	Not beneficial	Facilities that are less beneficial
Answer here		

Fraud perpetrated through ECSs /ECNs leads to growing threats to end-users in terms of loss of personal data or financial losses. In order to combat fraud Article 97(2) allows for competent authorities to order ECNs/ECSs to block numbers or access to services and in such cases to require from ECSs to withhold relevant interconnection or other service revenues. Which of the following do you consider true?

- ☐ This provision is sufficient to effectively combat fraud perpetrated through ECNs/ECSs such as interpersonal communications services (voice communications, SMS, MMS, instant messaging services, web-based e-mails)
- ☐ This provision does not allow to apply preventive measures to act swiftly and effectively against fraud schemes
- ☐ This provision does not allow processing of content data for such purposes in accordance with the existing data protection and privacy legislation

Do you consider that national authorities should have broader competences?

- ☐ Yes
- ☐ No
- ☐ No opinion

Please specify how the competences should be broadened.

Do you consider that ECS/ECN providers responsibilities should be further extended and specified?

- ☐ Yes
- ☐ No
- ☐ No opinion

Please specify how the responsibilities should be extended or specified. Please also specify how privacy and data protection concerns can be addressed, in your view, to allow lawful data processing for efficiently combatting fraud (possibly, by providing examples for applying privacy preserving techniques e.g., blockchain technology etc.).

	Extending ECS/ ECN responsibilities	Addressing privacy concerns
How would you do it?		

Are there areas in electronic communications service where in your view, the end-user protection should be increased?

Section 10: End-user protection

Reducing fragmentation

In order to avoid fragmentation of the internal market, the EECC provides for maximum harmonisation of end-user protection rules, while leaving the Member States the possibility to go beyond several of the obligations set by the EECC.

Please indicate how beneficial would be the following changes to improve the effectiveness of end-user protection rules:

	1 - Not beneficial	2	3	4	5	6	7	8	9 - Most beneficial
Status quo	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase protection of end-user with updates to sector-specific rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Update to directly applicable rules and reduce possibilities for national derogations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Update to directly applicable rules and reduce possibilities for national derogations and excluding business users from most end-user protection provided to consumers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Partial removal of EU level sector-specific rules combined with full harmonisation of remaining sector-specific rules (e.g. Art 106 on switching and number portability), where rules (without sector specificities) already exist under horizontal consumer law, adopted by Member States in conformity with the applicable directives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Full removal of sector specific rules, move to protection of									

consumers only under horizontal consumer law	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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In which areas do you see a need to increase the protection of end-users?

Which of the current EEC end-user rights could, in your view, be governed only under horizontal consumer law?

For the measures ranked 7-9, please explain what benefits are expected from the selected measures.

	Benefits
Status quo	
Increase protection of end-user with updates to sector-specific rules	
Update to directly applicable rules and reduce possibilities for national derogations	
Update to directly applicable rules and reduce possibilities for national derogations and excluding business users from most end-user protection provided to consumers	
Partial removal of EU level sector-specific rules combined with full harmonisation of remaining sector-specific rules (e.g. Art 106 on switching and number portability), where rules (without sector specificities) already exist under horizontal consumer law, adopted by Member States in conformity with the applicable directives	
Full removal of sector specific rules, move to protection of consumers only under horizontal consumer law	

As a company or authority for the measures you ranked 7-9, would you expect any cost savings? Please quantify if possible.

	Cost savings (Company or authority)	Quantifying the cost savings (Company or authority)
Status quo		
Increase protection of end-user with updates to sector-specific rules		
Update to directly applicable rules and reduce possibilities for national derogations		
Update to directly applicable rules and reduce possibilities for national derogations and excluding business users from most end-user protection provided to consumers		
Partial removal of EU level sector-specific rules combined with full harmonisation of remaining sector-specific rules (e.g. Art 106 on switching and number portability), where rules (without sector specificities) already exist under horizontal consumer law, adopted by Member States in conformity with the applicable directives		
Full removal of sector specific rules, move to protection of consumers only under horizontal consumer law		

For the measures ranked 1-3, please explain why these measures would not be beneficial. If an additional burden is expected, please identify it and quantify, if possible.

	Why not beneficial	Potential additional burden	Quantifying the additional burden
Status quo			
Increase protection of end-user with updates to sector-specific rules			
Update to directly applicable rules and reduce possibilities for national derogations			
Update to directly applicable rules and reduce possibilities for national derogations and excluding business users from most end-user protection provided to consumers			
Partial removal of EU level sector-specific rules combined with full harmonisation of remaining sector-specific rules (e.g. Art 106 on switching and number portability), where rules (without sector specificities) already exist under horizontal consumer law, adopted by Member States in conformity with the applicable directives			
Full removal of sector specific rules, move to protection of consumers only under horizontal consumer law			

What would be the consequences of maintaining the current end-user protection rules without changes?

Please indicate which of the following issues should be (in combination with any of the changes above), in your view, addressed with an update (whether simplification, removal, clarification, increased protection) of the current end-user rights rules of the EECC.

	1 - No need to change	2	3	4	5	6	7	8	9 - Urgent need to change
Quality of service information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contractual information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mechanisms for complaints and compensation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Effectiveness of monitoring tools (where available, pursuant to Art. 4 OIR)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Relation with horizontal rules	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Price indexation in contracts	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provider switching in case of embedded internet connectivity (IoT, including in cars)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fraud in electronic communications services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Harmonised caller location criteria for emergency communications	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Must carry obligations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Directory enquiry services	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Interoperability of car radio and consumer radio receivers and digital television equipment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on the environmental sustainability of the product	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify



For the issues ranked 7-9, please specify the update that is in your view required (e.g. simplification or improvement of end-user protection or relation to which horizontal rules).

	Required update
Quality of service information	
Contractual information	
Mechanisms for complaints and compensation	
Effectiveness of monitoring tools (where available, pursuant to Art. 4 OIR)	
Relation with horizontal rules	
Price indexation in contracts	
Provider switching in case of embedded internet connectivity (IoT, including in cars)	
Fraud in electronic communications services	
Harmonised caller location criteria for emergency communications	
Must carry obligations	
Directory enquiry services	
Interoperability of car radio and consumer radio receivers and digital television equipment	
Information on the environmental sustainability of the product	
Other	

Section 10: End-user protection

Improving the effectiveness of transparency provisions

Do you think the information end-users currently receive on quality of service, e.g. internet speed (fixed and mobile), is sufficiently clear?

- ☐ Yes, the information that consumers receive about quality of service (e.g. Internet speeds) for fixed and mobile is clear
- ☐ No, the information that consumers receive about quality of service (e.g. Internet speeds) for fixed and mobile is not clear or not clearly presented
- ☐ No opinion

What measures could be taken to improve the clarity of quality of service information (e.g. contract summary updates, labelling schemes, simplification of information, harmonised KPIs)?

Please explain in more detail what would be the costs and benefits associated with these measures:

Section 10: End-user protection

Facilitating switching

Switching provider can be particularly complex in the case of bundles and in some cases also regarding connected devices (IoT). Should the DNA include more measures to improve switching processes?

- ☐ Yes the DNA should include more measures to improve switching processes
- ☐ No further measures are needed to improve switching processes
- ☐ No opinion

Which of the following measures regarding switching would be most effective in improving switching processes?

	1 - Costs significantly outweigh benefits	2	3	4	5	6	7	8	9 - Benefits significantly outweigh costs
Requiring the providers of mobile services to offer Over-the-Air procedures for provisioning and switching, including for devices bundled with	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

connectivity (where technically feasible)									
Clarifying that terminal equipment under the EEC includes connected devices (such as cars) for the purposes of provisions regarding contract termination and switching, while providing for an exclusion in cases where connectivity is intrinsically linked to the operation of the device e.g. safety features	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Harmonising the period after which penalties may not be provided for contract termination, for example, to one year	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify

Please explain in more detail what would be the **costs** and **benefits** associated with these options.

	Costs	Benefits
Requiring the providers of mobile services to offer Over-the-Air procedures for provisioning and switching, including for devices bundled with connectivity (where technically feasible)		
Clarifying that terminal equipment under the EECC includes connected devices (such as cars) for the purposes of provisions regarding contract termination and switching, while providing for an exclusion in cases where connectivity is intrinsically linked to the operation of the device e.g. safety features		
Harmonising the period after which penalties may not be provided for contract termination, for example, to one year		
Other		

Section 11: Regulatory governance

The aim of the present study is to explore possible enhancements of regulatory governance in the area of electronic communications in view of simplification and possible new harmonized tasks, e.g., in the area of general authorisation, definition of a harmonised wholesale access product, tasks related to satellite access to EU market and enforcement of common requirements, cloud switching.

Do you think that EU-level governance (i.e. the interplay of NRAs and competent authorities, BEREC and the BEREC Office, RSPG, European Commission) could benefit of amendment?

- ☐ Yes
☐ No
☐ I don't know / No opinion

Please explain what changes are required to the current regulatory governance at the EU level.

Please explain why you think no changes are required to the current regulatory governance at the EU level.

Please indicate which of the following measures would be beneficial to improve the effectiveness of the European Commission.

	1 - Not beneficial	2	3	4	5	6	7	8	9 - Most beneficial
No changes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obtain decision-making powers on cross-border issues	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obtain decision-making powers on (selected issues of) spectrum management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For the measures ranked 7-9, please describe what benefits you expect from these measures. Quantify the benefits, if possible.

	Benefits	Quantifying the benefits
Obtain decision-making powers on cross-border issues		
Obtain decision-making powers on (selected issues of) spectrum management		

For the measures ranked 1-3, please explain why these measures would not be beneficial. If additional burden/ costs are expected, please identify and quantify them, if possible.

	Not beneficial	Additional burden	Quantifying the additional burden
Obtain decision-making powers on cross-border issues			
Obtain decision-making powers on (selected issues of) spectrum management			

Please indicate which of the following measures would be beneficial to improve the effectiveness of the RSPG.

	1 - Not beneficial	2	3	4	5	6	7	8	9 - Most beneficial
No changes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Provide RSPG with more administrative support (e.g. BEREC Office could also be used to support RSPG, thereby replacing also the Commission which is currently providing RSPG secretariat)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Make RSPG a body (no longer a high-level advisory group on radio spectrum policy), but without legal personality	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Make RSPG a fully-fledged agency with legal personality and decision-making powers on selected cross-border spectrum issues	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For the measures ranked 7-9, please describe what benefits you expect from these measures. Quantify the benefits, if possible.

	Benefits	Quantifying the benefits
Provide RSPG with more administrative support (e.g. an EU agency could also be used to support RSPG, thereby replacing also the Commission which is currently providing RSPG secretariat)		
Make RSPG a body (no longer a high-level advisory group on radio spectrum policy), but without legal personality		
Make RSPG a fully-fledged agency with legal personality and decision-making powers on selected cross-border spectrum issues		

For the measures ranked 1-3, please explain why these measures would not be beneficial. If additional burden/ costs are expected, please identify and quantify them, if possible.

	Not beneficial	Additional burden	Quantifying the additional burden
Provide RSPG with more administrative support (e.g. an EU agency could also be used to support RSPG, thereby replacing also the Commission which is currently providing RSPG secretariat)			
Make RSPG a body (no longer a high-level advisory group on radio spectrum policy), but without legal personality			
Make RSPG a fully-fledged agency with legal personality and decision-making powers on selected cross-border spectrum issues			

Please indicate which of the following measures would be beneficial to improve the effectiveness of BEREC and the BEREC Office (considering that BEREC is a network of European regulators whereas the BEREC Office is currently an EU decentralised agency administratively supporting BEREC with no competence on substance)?

	1 - Not beneficial	2	3	4	5	6	7	8	9 - Most beneficial
No changes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Make BEREC Office an agency supporting both BEREC and RSPG	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Merge BEREC and BEREC Office in a single EU decentralised agency; such agency could also have decision-making powers on selected cross-border issues and become a secretariat to RSPG	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Merge RSPG and BEREC into one single fully-fledged agency with legal personality, where both BEREC and the RSPG would have decision-making powers on selected cross-border issues	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

For the measures ranked 7-9, please describe what benefits you expect from these measures. Quantify the benefits, if possible.

	Benefits	Quantifying the benefits
Make BEREC Office an agency supporting both BEREC and RSPG		
Merge BEREC and BEREC Office in a single EU decentralised agency; such agency could also have decision-making powers on selected cross-border issues and become a secretariat to RSPG		
Merge RSPG and BEREC into one single fully-fledged agency with legal personality, where both BEREC and the RSPG would have decision-making powers on selected cross-border issues		

For the measures ranked 1-3, please explain why these measures would not be beneficial. If additional burden/ costs are expected, please identify and quantify them, if possible.

	Not beneficial	Additional burden	Quantifying the additional burden
Make BEREC Office an agency supporting both BEREC and RSPG			
Merge BEREC and BEREC Office in a single EU decentralised agency; such agency could also have decision-making powers on selected cross-border issues and become a secretariat to RSPG			
Merge RSPG and BEREC into one single fully-fledged agency with legal personality, where both BEREC and the RSPG would have decision-making powers on selected cross-border issues			

Do you see the need to improve the coordination at national level among national regulatory authorities and other competent authorities?

- ☐ Yes
- ☐ No
- ☐ No opinion

What would be the best way to improve such coordination?

Do you see the need to improve the coordination at EU level among BEREC and other bodies established in other interrelated areas of digital policies?

- ☐ Yes
- ☐ No
- ☐ No opinion

What would be the best way to improve such coordination?

What would be the consequences and benefits of keeping the regulatory governance in the area of electronic communications as it exists today?

Section 12: Finalisation

Could you please share any relevant documents and data that would be useful for the purposes of our evaluation? (please add documents here or contact the project team Gilles.Van.Cappellen@be.ey.com)

Thank you for your contribution!

