

Public Consultation on the Draft BEREC Work Programme 2025

CCIA Europe response

October 2024

The Computer & Communications Industry Association (CCIA Europe) welcomes the opportunity to participate in the public consultation on the 'Draft BEREC work programme 2025'. CCIA would like to express its full support for the relevant work that the Body of European Telecom Regulators (BEREC) has been conducting in the past years, and we are glad to be able to contribute to the work programme for 2025.

CCIA Europe commends BEREC for its comprehensive and forward-looking approach, as well as the essential role it continues to play in shaping Europe's digital infrastructure and telecommunications ecosystem.

In relation to the Draft BEREC work programme 2025, we particularly support the focus on key areas such as submarine cable connectivity, satellite communications, sustainability, and open digital markets. CCIA members are dedicated to continuously invest in and develop technologies such as low earth orbit satellites, content delivery networks and subsea cables, all aimed at ensuring that connectivity can reach anyone, in the most efficient and cost effective way possible. In relation to sustainability, CCIA is eager to contribute to BEREC's work, sharing the best practices that all our members already implement, to make sure their operations have the least impact possible on our environment.

Additionally, we look forward to supporting BEREC in its efforts to implement the Digital Markets Act and the Data Act, and are interested in understanding how BEREC envisions its role in these areas. We encourage BEREC to continue its essential work in ensuring a consistent and cohesive approach to enforcing these new digital regulations, particularly as it considers how to leverage its position within the Digital Markets Act High-Level Group and the role it will have leading up to the Act's revision in 2026.

I. Developing the BEREC Work Programme 2026

Turning to a crucial juncture in European digital policy, with the upcoming reviews of the European Electronic Communications Code (EECC)¹, the Open Internet Regulation (OIR)², and the 2030 Digital Targets³, CCIA suggests to include in BEREC's Work Programme for 2026, a work item dedicated to the review of the 2030 Digital Targets.

Article 4 of Decision 2022/2481⁴, which establishes the Digital Decade Policy Programme 2030, mandates a review of these targets by June 2026. In light of this, we believe it would

¹ Directive (EU) 2018/1972 establishing the European Electronic Communications Code, Article 122, available [here](#).

² Regulation (EU) 2015/2120 laying down measures concerning open internet access and amending Directive 2002/22/EC on universal service and users' rights relating to electronic communications networks and services and Regulation (EU) No 531/2012 on roaming on public mobile communications networks within the Union, Article 9, available [here](#).

³ Decision (EU) 2022/2481 establishing the Digital Decade Policy Programme 2030, Article 4. Available [here](#).

⁴ *Ibid.*

be valuable for BEREC to also contribute to this review, focusing on the feasibility and practicality of the targets.

While the 2030 digital targets are an important and necessary framework, we think a reassessment would be beneficial. For example, the goal of ensuring fibre connectivity everywhere may not be necessary. Instead, we advocate for a technology-neutral approach that ensures adequate connectivity everywhere, including solutions like satellite technology.

Moreover, we believe demand-side measures should be integrated into the targets to stimulate connectivity deployment more effectively. By prioritising demand, the natural outcome will be an increase in infrastructure deployment to meet that demand.

We believe a renewed discussion on these targets would benefit the public discourse on connectivity, and ensure the achievement of goals that are actually beneficial for the whole community, spanning from consumers to telecom operators, including bigger and smaller content and application providers.

II. Conclusion

CCIA Europe reiterates its strong support for BEREC's work and its critical role as an independent actor in this ecosystem. We remain committed to contributing to BEREC's work and look forward to continued collaboration on key initiatives that drive connectivity, sustainability, and technological innovation throughout Europe.

About CCIA Europe

The Computer & Communications Industry Association (CCIA) is an international, not-for-profit association representing a broad cross section of computer, communications, and internet industry firms.

As an advocate for a thriving European digital economy, CCIA Europe has been actively contributing to EU policy making since 2009. CCIA's Brussels-based team seeks to improve understanding of our industry and share the tech sector's collective expertise, with a view to fostering balanced and well-informed policy making in Europe.

Visit ccianet.eu, x.com/CCIAEurope, or linkedin.com/showcase/cciaeurope to learn more.

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