

## CCIA Europe Response to European Commission's Call for Evidence on the Review of the Digital Decade Policy Programme

# Making Europe's Digital Targets Future Proof

December 2025

The Computer and Communications Industry Association (CCIA Europe) welcomes the opportunity to participate in the European Commission's [call for evidence](#) on the review of the Digital Decade Policy Programme and commends this initiative. To inform the work of the European Commission, CCIA Europe respectfully offers the following set of recommendations.

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## I. Adopt a tech-neutral approach to digital infrastructure targets

*CCIA Europe believes that the European Commission should review its digital infrastructure targets with a holistic approach, and formally integrate LEO satellite broadband into the Union's connectivity toolkit.*

### Recommendations:

1. Ensure technology neutral broadband policies, and include Low Earth Orbit satellites among the viable technologies
2. Promote policies fostering consumer demand for next-gen broadband services

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## II. Simplify the EU regulatory framework, to reach digitalisation of businesses targets

*Regulatory predictability and clarity are key to foster digital transformation of businesses. For this reason, CCIA Europe suggests the European Commission to continue its simplification efforts in areas such as cloud computing and AI regulation.*

### Recommendations:

3. Simplify the existing regulatory framework to ensure digital transformation of businesses
4. Do not add regulatory complexity to highly regulated sectors

## Introduction

The Computer & Communications Industry Association (CCIA Europe) reiterates its strong support for the Digital Decade Policy Programme ('DDPP') 2030 and its overarching objectives as set out in Article 3 of the [Decision](#) 2022/2481 establishing the Digital Decade Policy Programme 2030 (the 'Decision').

CCIA Europe recognises the DDPP as a critical lever for driving Europe's digital transformation, and believes this call for evidence comes at a right moment, when the European Commission can review its targets in light of the progress reached so far, the new available technologies, and in the context of the renewed goals of simplification and competitiveness.

CCIA Europe's contribution focuses on the targets of secure, resilient, performant and sustainable digital infrastructures and digital transformation of businesses, as defined in Article 4 of the Decision. In particular, we believe that if Europe wants to efficiently reach its digital infrastructure targets, it should adopt a tech-neutral approach, and avail itself of available new technologies, such as Low Earth Orbit (LEO) satellites. In addition, if Europe wants to achieve its targets of business digitalisation, it should ensure its simplification goals are met, and not introduce new obligations on key technologies such as cloud computing and AI.

## I. Adopt a tech-neutral approach to digital infrastructure targets

*CCIA Europe believes that the European Commission should review its digital infrastructure targets with a holistic approach, and formally integrate LEO satellite broadband into the Union's connectivity toolkit.*

### 1. Ensure technology neutral broadband policies, and include low earth orbit satellites among the viable technologies

CCIA Europe offers the below comments in relation to the digital decade target of secure, resilient, performant and sustainable digital infrastructure, as defined in Article 4(2 a) of the Decision. CCIA Europe would like to note that, contrary to the prevailing narrative suggesting a systemic failure of European digital infrastructure, an analysis of the 2025 data reveals that Europe remains on a trajectory that brings it very close to its 2030 objectives.”<sup>1</sup>

According to the Commission's own projections, Europe is expected to reach approximately 94% Very High Capacity Network (VHCN) coverage by 2030.<sup>2</sup> While this technically falls short of the 100% target, it does not represent a crisis but rather a marginal gap that does not justify a radical regulatory overhaul. Regarding mobile connectivity, the industry is delivering on the original 5G population coverage targets.

<sup>1</sup> Benoit Felten, Robert Kenny, William Webb, *European telecom operators are well placed to meet future investment requirements in digital infrastructure*, October 2025, available [here](#).

<sup>2</sup> *Ibidem*.

CCIA Europe maintains that the perceived gap often results from informal target-shifting, such as for example with 5G Standalone, which is not part of the targets but often mentioned by the Commission as among the goals<sup>3</sup>, or due to specific national anomalies. Indeed, the narrative of an EU-wide connectivity crisis is statistically influenced by data from Germany and Italy.<sup>4</sup> When these two markets are isolated, Europe's performance compares very favourably with international peers. The slower rollout in these nations is driven by specific legacy choices and national market circumstances, which are best addressed through targeted national policy, rather than through pan-European interventions that would distort the single market to solve a localised issue.

In this context, CCIA Europe believes that the European Commission should review its targets with a holistic approach, and formally integrate LEO satellite broadband and other innovative technologies into the Union's connectivity toolkit. LEO systems have evolved over the past years and can now offer multiple terabits of capacity. In addition, they can meet the needs of residential (with offerings of up to 400Mbps) and business customers (with fibre-like speeds up to 1 Gbps), through state-of-the-art antennas. LEO broadband can deliver low-cost, low-latency, high-quality broadband to end users, and give them more choice.

Indeed, the Commission should move beyond a 'fibre-first' thinking, and embrace a truly technologically neutral approach. According to Commission data, more than 30% of the EU's population resides in rural areas,<sup>5</sup> yet connectivity in these regions lags significantly, with 'full coverage only achieved by 2051. In particular, rural deployment of fibre lags behind, with just 58.8% coverage in 2024.<sup>6</sup> In these hard-to-reach areas, the cost per premise for fibre deployment increases exponentially, beyond what is economically viable.

While fibre infrastructure remains a good choice for the majority of EU households, there are compelling reasons to consider complementary technologies such as LEO satellite to serve more remote areas in a cost-effective manner, effectively bridging the digital divide and meeting the gigabit ambition of the Digital Decade. A study issued by Analysys Mason estimates that, in 7 EU countries analysed (Czechia, France, Germany, Greece, Hungary, Italy and Poland), LEO satellite constellations will have sufficient capacity to serve as many as 2.6 to 4.2 million customers.<sup>7</sup> The study ultimately finds that LEO broadband connectivity can be more cost-effective than FTTH for 5–42% of households, depending on the country and the bandwidth scenario in question. LEO broadband systems are also able to provide backhaul for 5G wireless carriers, which allows them to further expand 5G into rural areas.

Moreover, integrating LEO broadband into national strategies can drastically reduce the burden on public finances. Indeed, the report estimates that commercially offered LEO broadband could help save up to 37% of the fibre subsidies needed to connect all

<sup>3</sup> For example, see European Commission, White Paper on *How to master Europe's digital infrastructure needs*, February 2024, available [here](#).

<sup>4</sup> *Ibidem*, and in particular see Table 2.1: EU assessment of VHCN and 5G progress per country, page 10.

<sup>5</sup> EU rural areas in numbers, available [here](#).

<sup>6</sup> ANNEX to the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions State of the Digital Decade 2025: *Keep building the EU's sovereignty and digital future*, available [here](#).

<sup>7</sup> Analysys Mason, *LEO satellite broadband: a cost-effective option for rural areas of Europe*, February 2025, available [here](#).

households in these 7 EU countries by 2030.<sup>8</sup> Similarly, relying on 5G Fixed Wireless Access (FWA) where fibre is uneconomical could further reduce necessary subsidies.<sup>9</sup>

Beyond cost, satellite connectivity offers immediate roll-out capabilities, bypassing the slow and disruptive civil works required for trenching fibre, while also providing a crucial redundancy layer that ensures continuity of service during natural disasters or terrestrial network outages. CCIA Europe calls on the European Commission to explicitly acknowledge in the 2026 Review that the Gigabit connectivity target can be met via a mix of technologies, including LEO satellite and 5G FWA.

Furthermore, as the EU finalises the upcoming EU Space Act, it is key that the regulation remains evidence-based and pro-competitive, avoiding protectionist measures that would hinder the ability of non-EU LEO providers to serve European consumers.<sup>10</sup> Ultimately, for the most difficult-to-reach areas, the barrier to connectivity is no longer a lack of funding but a lack of technological flexibility; policy should therefore work backwards from the needs of the EU citizen rather than favoring specific infrastructures.

## **2. Promote policies fostering consumer demand for next-gen broadband services**

While the European Union has made significant progress in infrastructure deployment with 5G population coverage already standing at 94%,<sup>11</sup> the market faces a critical “demand gap” where uptake of gigabit speeds at only 22% lags significantly behind availability in 2024.<sup>12</sup>

This gap exists largely because, for many consumers and businesses, there are currently few concrete use cases that justify switching to, or paying a premium for gigabit speeds. Consequently, the focus of the Digital Decade review should pivot from supply-side intervention focused only on delivering gigabit speeds, to demand-side stimulation, and recognizing technologies that can meet end users’ speed needs (such as LEO broadband and 5G FWA). To bridge this gap, policy should nurture a pro-innovation regulatory environment that encourages companies to deploy the very services that drive demand for high-speed connectivity. Conversely, the European Union should avoid introducing rules equivalent to network fees (such as dispute resolution or voluntary mechanisms) that will discourage consumer demand.

## **II. Simplify the EU regulatory framework, to enable digitalisation of businesses**

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*Regulatory predictability and clarity are key to foster digital transformation of businesses. For this reason, CCIA Europe suggests the European Commission to continue its simplification efforts in areas such as cloud computing and AI regulation.*

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<sup>8</sup> *Ibidem.*

<sup>9</sup> *Ibidem.*

<sup>10</sup> CCIA Europe, Position Paper on the Proposal for the EU Space Act: Making EU space regulation fit for the future, November 2025, available [here](#).

<sup>11</sup> DESI 2025 indicators, available [here](#).

<sup>12</sup> *Ibidem.*

### 3. Simplify the existing regulatory framework to ensure digital transformation of businesses

CCIA Europe suggests that the European Commission continues its simplification efforts to facilitate the digital transformation of businesses, as outlined in Article 4 of the Decision. Indeed, the strongest economies are those that deploy and consume digital technologies at scale. Cloud, AI, data-driven services, and next-generation connectivity are not merely distinct sectors, but technologies that can drive efficiency and innovation across the entire economy. However, the single biggest barrier to Europe's competitiveness today is its regulatory complexity. CCIA Europe maintains that if Europe wants to encourage cloud and AI adoption, it should implement a simple, clear and predictable regulatory framework - which allows the seamless adoption of these technologies by SMEs and startups.

Indeed, CCIA Europe welcomes the European Commission's Digital Omnibus simplification package, as the right step towards simplifying the EU's complex regulatory landscape for digital and tech legislations. However, we maintain that its narrow focus – mainly limited to AI, cybersecurity, data rules, and privacy – means further and bolder action is still needed.<sup>13</sup> We urge the Commission to simplify its regulatory framework, synchronising implementation timelines and harmonising enforcement so that businesses do not face 27 divergent interpretations of the same law. The primary goal should be to cut red tape, restore legal certainty, and ensure that regulatory efforts translate into tangible results that strengthen Europe's global competitive standing.<sup>14</sup>

An open single market ensures that citizens everywhere, from major cities to rural regions, gain access to the best technologies at the lowest cost. By prioritising implementation clarity, especially for the AI Act, and proportionate cybersecurity rules that raise resilience without shutting out international providers, the EU can build a trustworthy environment where organisations can adopt new technologies responsibly and confidently.

Finally, CCIA Europe suggests that, to allow for a more realistic assessment of business technology adoption, targets for cloud and AI uptake should be disaggregated to distinguish between advanced use and baseline diffusion. Current indicators often capture relatively basic applications, for example, counting the use of cloud-based email as cloud adoption, which can overstate transformational uptake. Policymaking should encourage both basic and advanced use of these technologies, while relying on robust data and appropriately calibrated targets.

### 4. Do not add regulatory complexity to highly regulated sectors

Achieving the ambitious target where at least 75% of Union enterprises take up cloud computing services, big data, and artificial intelligence, and where more than 90% of SMEs reach basic digital intensity, requires a regulatory environment that fosters innovation rather than stifling it with unnecessary complexity.

To reach the target of 75% cloud adoption by 2030, it is imperative that the regulatory framework remains conducive to uptake and does not impose unjustified burdens on the

<sup>13</sup> CCIA Europe, Press Release: *Digital Omnibus: Simplification of EU Tech Rules Requires Bolder Action*, November 2025, available [here](#).

<sup>14</sup> For more suggestions on simplification, please see: CCIA Europe, *Position Paper on the European Commission's Digital Simplification Efforts*, October 2025, available [here](#).

cloud sector. CCIA Europe urges the Commission to resist calls to extend the scope of the European Electronic Communications Code (EECC) to cloud service providers, Content Delivery Networks (CDNs), and other digital players through the Digital Networks Act (DNA). Such a proposal, framed under the guise of creating a “level playing field” due to alleged convergence, is fundamentally flawed; cloud providers and telecom operators offer distinct services and operate in a reciprocal customer-supplier relationship, not a converging market.<sup>15</sup>

In this context, it is particularly important to draw a clear regulatory distinction between telecommunications operators and Content Delivery Network (CDN) providers, as conflating these distinct actors would undermine the simplification agenda. While telecom operators provide the underlying physical connectivity and infrastructure, CDNs operate at a different layer, functioning as a specialised service that optimises the secure, sustainable, and efficient delivery of content requested by users. CDNs are not internet access providers; rather, they serve as enablers, by caching content closer to the end-user, thereby reducing latency, improving the quality of experience, and significantly lowering the energy consumption of data transmission. Extending the EECC to such players would ignore fundamental technical differences and create legal uncertainty that could stifle the very efficiency gains these networks provide.<sup>16</sup>

To genuinely achieve the simplification objectives of the DNA and the DDPP, the regulatory framework must clearly differentiate between regulated services based on their actual technical characteristics. Over-the-Top (OTT) services for example, including Number-Independent Interpersonal Communications Services (NI-ICS), differ fundamentally from traditional electronic communications services and Number-Based Interpersonal Communications Services (NB-ICS). Notably, OTT services do not have access to physical infrastructure, do not manage the “last mile” connectivity, do not utilise public spectrum resources, and cannot guarantee access to end-to-end emergency services. Furthermore, these services foster competition in the electronic communications market by providing consumers with flexible alternatives and low transaction costs.

Consequently, the DNA should not expand existing telecom rules, such as the general authorisation regime, to new digital services with fundamentally different hardware and software features. Instead, OTT services, including NI-ICS, should remain subject only to light-touch registration requirements. However, even these limited obligations are currently applied through 27 different national regimes, acting as a significant barrier to the Single Market. The DNA can hence be an opportunity to harmonise these rules by embedding the country of origin principle as a core simplification measure. Ensuring that cross-border digital and communications services face a single set of rules, supervised by the rational regulatory authority of their establishment, rather than 27 divergent regimes would significantly reduce compliance fragmentation and accelerate investment in new technologies.

Finally, the DDPP’s aim of “building a safe and secure digital world” should be assessed in a holistic manner, ensuring that the services citizens rely on every day are grounded in a

<sup>15</sup> Please see: (i) CCIA Europe response to European Commission’s call for evidence on the Digital Networks Act, July 2025, available [here](#); (ii) CCIA Europe response to European Commission’s Consultation on the White Paper on How to Master Europe’s Digital Infrastructure Needs, June 2024, available [here](#).

<sup>16</sup> Analysys Mason, The European telecoms regulatory framework: not a good fit for the public cloud, September 2024, available [here](#).

security-by-design approach. Strong end-to-end encryption, particularly for personal messaging services, should continue to be encouraged as a best practice to protect users' data across the EU and to prevent a drift toward a lowest-common-denominator level of protection. The review should consider how to support a coherent, EU-wide framework for communications security, avoiding fragmented national measures that weaken security and create legal uncertainty. A harmonised approach to encryption is critical to maintaining user trust and ensuring that digital safety is not compromised by inconsistent oversight or diverging lawful-access regimes.

## Conclusion

CCIA Europe fully supports the 2030 Digital Decade Policy Programme but urges a strategic review, as closing the final connectivity gaps and driving business digitalisation requires a pragmatic shift toward flexibility and competitiveness.

First, the Commission should embrace true technological neutrality, and integrate cost-effective solutions like LEO satellite broadband and 5G FWA into national strategies.

Second, the digitalisation of European business demands regulatory simplification, not expansion. To reach the 75% cloud adoption goal, the Commission must streamline the current regulatory framework and firmly reject extending legacy telecom rules to the cloud and CDN sectors. Ultimately, Europe's digital success depends on an open, competitive market that empowers innovation rather than burdening it with red tape.

## 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.

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