



Dear Mr Soriano,

INTUG is delighted to have this opportunity to provide preliminary input to the preparation of the BEREC work programme for 2017. In this letter, we highlight the issues of greatest priority for business users of communications services, and suggest that these are topics meriting BEREC resource.

### **Universal Access to High Speed Broadband**

A sustainable and competitive market for wholesale broadband access throughout the EU is essential to enable businesses to acquire cross border services in support of growth in trade, generating economic growth, improved productivity and employment. The move from copper to fibre-based access should be accelerated to assist progress, with open and non-discriminatory access to active and passive infrastructure. BEREC should closely monitor wholesale copper and fibre rates.

### **International Mobile Services including Elimination of Roaming Charges**

Business users need a seamless competitive international market for mobile services as well as sustained competition at national level. Implementation of the regulation eliminating roaming charges must be closely monitored, including oversight of the necessary changes in the wholesale rates and termination rates and “Fair Use” caps which are appropriate for businesses with thousands of devices as well as for residential users. Requests for derogation for economic reasons should be robustly challenged. BEREC should monitor progress and seek to achieve greater harmonisation and consistency of rates. Early investigation of 5G with the potential re-use of spectrum when licences expire is needed. There is a need for soft SIMs or a standard E-SIM to support machine-to-machine communications, avoiding vendor lock in for the Internet of Things will be important.

### **Network Neutrality/Quality of Service**

The interpretation of Network Neutrality is critical for applications requiring guaranteed quality of service, not just in financial services, but for many mission critical applications. BEREC should review the consistency of NRA transposition decisions. The abuse of Network Neutrality with zero rating and discriminatory arrangements should be avoided.

This could be linked with BEREC action on Relevant Market 4 for Specialised Services.

**NB INTUG will also provide a separate input on Network Neutrality as requested.**

### **Cloud Services and Software Licences**

INTUG has prepared a proposal for a Software Code of Conduct for software publishers. BEREC is encouraged to review the extent to which NRAs are engaged in these topics and may wish to consider consulting on whether this should be within scope. The growth of Software Defined Networks (SDNs) and Cloud Services for the Digital Single Market links these topics closely with communications services and software publishing.

### **Indoor coverage**

The need for work on “indoor” coverage for fixed, wireless and mobile communications has been raised as an issue by several of INTUG’s country representatives, and extends to coverage in shared spaces such as shopping malls, sports stadia, large entertainment sites and business premises with single and multiple occupancy. The need to sustain competition and choice and the ability to switch



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suppliers easily within such locations needs regulatory protection. BEREC should urge the European Commission to seek an international standard for multi-operator mobile indoor environments.

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