



ETNO response to BEREC Report on COVID-19 crisis – lessons learned regarding communications networks and services for a resilient society

July 2021

ETNO welcomes the initiative of BEREC to undergo a stock-take of the lessons learned regarding communications networks and services for a resilient society, including the response of the NRAs.

The global COVID-19 crisis once more shed light on the importance of strong and reliable connectivity among societal and business communities. The COVID-19 crisis showed that telecom networks witnessed an increase in internet traffic, as entire societies moved to remote working, but ISPs have coped extremely well with the increase in internet traffic and they avoided networks congestions.

While the obligation to work from home meant that the demand for connectivity reached an all-time high, Europe's telecommunications industry faced declining revenues (see e.g. ETNO State of Digital Communications 2021 p. 41), further undermining the industry's ability to invest.

In a [policy note](#) published in May 2020, as well as in our COVID-19 [FAQs](#) and [joint telecoms statement](#) on the recovery, we assessed the impact of the coronavirus crisis on our sector, and offered an analysis of how to reboot Europe's economy and society by leveraging telecoms networks and digital services.

Telecoms response to the crisis

During the pandemic, our members focused their response on the following areas:

- Our operators worked to ensure the **continuity of their services** in a reliable, stable and secure manner, including the resilience of emergency communication services. This was in a context in which we reported an up to 50% increase in voice traffic, up to 40% increase in mobile data traffic, and up to 70% increase in fixed data traffic.
- Our operators mobilized resources to **support customers**, public administrations and local communities, including the delivery of free or unlimited services.
- Our operators worked to ensure the **health and safety of their employees**, as well as the integrity of the network, including – but not limited to – responding to a spike in misinformation about 5G and coronavirus.

Our operators cooperated with public administrations at local, national and EU level **to share anonymized and aggregated mobility data in the fight against COVID-19** in full compliance with EU legislation.

Impact on telecoms policy and regulatory framework

As our engineers and experts worked on adapting to new circumstances in the crisis, they have encountered some difficulties related to regulation and policy:

- **Non-homogeneous digitisation** and digital readiness, especially among citizens, employees, SMEs and public sector, across Member States;
- Hesitations and diverging views, especially at the level of **data protection authorities**, as to privacy provisions, with special regard to the use of network data or contact tracing apps for supporting health authorities;

- Uncertainty and potentially different degrees of flexibility of national regulatory authorities as to the *interpretation of Open Internet provisions for coping with changes in traffic patterns*;
- Difficulties in getting relevant *authorisations or permits at local level to deploy, manage and repair networks*, and delays on 5G deployment linked to uncertainty around spectrum auctions and to the way forward with security and equipment manufacturers.
- Continuity of **revenue decreasing regulatory measures** such as the Delegated Act setting a single maximum Union-wide mobile voice termination rate and a single maximum Union-wide fixed voice termination rate. By imposing a disruptive reduction in the mobile termination rates of 70% within 3 years the proposal lacks proportionality and is ill suited at a time when operators need all their financial resources to serve all EU citizens with the best in class connectivity that is expected to underpin the recovery of the COVID crisis meeting the Next Digital Decade connectivity targets for 2030.

Moving forward

As we look forward to emerging from the COVID-19 crisis, in the anticipation of building a strong, robust, accessible and secure digital economy and society, there are a number of key areas where policy and regulation can contribute to addressing the observed issues.

- **Promoting investment and reducing the cost of deployment**, including by improving infrastructure access and granting of permits,¹ promote EU-wide good practices in spectrum allocation and use, align competition rules and digital aspirations, and focus on inclusive connectivity.
- Though the timing to allocate spectrum for the deployment of 5G networks is an important consideration, **spectrum assignment conditions should be well designed**. Auctions should be designed to secure efficient assignment of spectrum with a clear objective to generate greatest economic value from its use rather than to raise revenues. Member States should avoid withholding important spectrum resources from national public auctions e.g. for state operator, new entrant, local operators, or vertical use. ETNO is of the view that there is no need to reserve internationally harmonized spectrum for private networks serving different verticals, or for other reasons.
- **Reinforcing digital communications ecosystem**, by, inter alia, deeply digitizing Europe's SMEs and public administration, paving the way for the creation of digital leaders, and realizing Europe's potential in data-driven services.
- Focus on leveraging the potential and capabilities of the remaining European assets in the digital space such as the telecom operators. That means supporting at both European and national levels the process of virtualization of our network functions and the move towards the edge to increase the responsiveness and the capabilities of our networks. But it also means avoiding restrictions on critical cooperation aspects such as network sharing agreements that will be fundamental to achieve the densification needed for 5G networks.
- Consider flexibilization of regulatory measures such as the restrictions on network management capabilities imposed by the Open Internet Regulation instead of focusing on a degradation of the end-user quality of experience to avoid situations of network congestion.

Moreover, for Europe's green recovery, the following additional aspects should be considered:

¹ ETNO Discussion Paper on the BCRD review available here: <https://etno.eu/library/reports/97-etno-bcrd.html>

- Building on the sector's broad variety of **established good practices and expertise in the areas of sustainability**, by ensuring that future solutions make the most of market innovation, are effective and are based on a pragmatic and balanced approach.
- Supporting the sectors' ability to further **advance towards carbon neutrality and material efficiency**, including by ensuring a comprehensive approach that reflects the responsibilities of all ICT players.
- Establish an **innovation and investment friendly framework** that boosts the enabling potential of telecom infrastructure and services, by accelerating digitalisation of the European economy and society, which in turn will make them both greener and smarter.

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