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Delivering EU scale in connectivity: an assessment of the Digital Networks Act

Executive summary

The proposed Digital Networks Act (DNA) is Europe's latest attempt to deliver a more harmonised and investment-friendly connectivity framework.[1] It moves from a Directive to a Regulation and introduces new Union-level mechanisms. This shift is necessary but not sufficient: EU-level centralisation will only deliver results if it produces genuine simplification, legal certainty and faster decision-making.

Previous telecoms reforms, including the European Electronic Communications Code (EECC), already sought to reduce fragmentation.[2] However, many coordination tools remained non-binding and reliant on voluntary alignment between Member States, particularly regarding conditions, timing and procedures. The DNA proposal goes in the right direction in several key areas: the introduction of a single passport for service provision, a Union-level satellite authorisation regime and a more investment-oriented spectrum framework all have the potential to remove structural barriers and improve predictability for operators.

To deliver, this shift must avoid a set of foreseeable risks, and result in genuine simplification rather than a relocation of complexity to the EU level. In several areas, new procedures, coordination layers and implementing measures could recreate fragmentation or delay decision-making in a different form:

- **The single passport must operate as a truly self-contained system**. Host Member States must not recreate parallel notification/registration requirements in substance, and enforcement must avoid duplicative proceedings or 'double jeopardy' for the same breach.
- **The investment-oriented spectrum approach should be preserved and reinforced**, ensuring that any grounds for modification or non-renewal are narrowly defined and applied predictably, whilst EU-level coordination reduces fragmentation without delaying assignments.
- **The Union satellite authorisation framework should remain aligned with existing international and European coordination mechanisms**, notably ITU obligations and established CEPT-based harmonisation approaches, and must not introduce new barriers to terminal deployment across Europe.

[1] COM(2026) 16 final.

[2] Directive (EU) 2018/1972.

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- **Copper-to-fibre transition should be accelerated through incentives and readiness-based flexibility, not fixed EU timelines**. Switch-off should occur when measurable readiness conditions are met, guaranteeing end-users equivalent or improved services.
- **Specialised services need legal certainty in the primary text**, rather than leaving key elements to future implementing acts that would prolong uncertainty.
- **Resilience and security provisions must avoid duplication**, in particular with NIS2.[3] New data collection requirements should be limited to identified gaps.
- The end-user rights and universal service framework largely preserves the EECC toolbox. The DNA should focus on **reducing gold plating and fragmentation in practice**, and on **keeping universal service strictly limited to affordable basic broadband** and addressing remaining gaps through targeted, technology-neutral public funding and demand-side measures like vouchers.
- **Governance and secondary legislation must be proportionate**: essential elements should be defined in the Regulation itself, with implementing/delegated acts limited to technical and operational detail, prioritised and adopted within clear timelines.

Overall, the DNA can deliver more integrated and investment-friendly connectivity across Europe. This will depend on ensuring that centralisation leads to simplification, legal certainty and faster decision-making, rather than additional bureaucracy.

[3] Directive (EU) 2022/2555.

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Removing barriers to EU scale

Single passport

Whilst the general authorisation regime has reduced formal licensing requirements, providers operating across several Member States still face multiple national procedures, divergent administrative practices and inconsistent supervisory approaches. This fragmentation increases the cost of cross-border operations, limits scale and weakens the investment case for high-capacity networks and services.

The DNA seeks to address this through the introduction of a 'single passport.' A provider notifies one national regulatory authority (NRA), receives confirmation within a short and predictable timeframe and may then operate in the Member States covered by that notification, with the Office for Digital Networks (ODN) acting as the Union-level transmission and transparency layer.[4] The notifying authority assumes the primary role for enforcing general authorisation conditions, whilst host authorities retain a narrowly framed possibility to intervene in exceptional cases linked to national security or public interest.[5]

The effectiveness of the passport will depend on whether it prevents fragmentation from re-emerging in practice through parallel procedures, repeated information requests or overlapping enforcement. The framework recognises that certain areas – including cybersecurity, access to data, lawful interception and data retention – remain subject to national requirements.[6] This makes it even more important that the passport does not become an 'everything except X' regime, where host Member States recreate barriers through procedural requirements that are equivalent in effect to additional authorisations.

Similarly, the single passport's effectiveness will depend on a clear and proportionate scope of the general authorisation regime. The proposal's reference to 'information society services' introduces ambiguity as to the services covered, despite no clear policy intention to expand the scope beyond electronic communications.[7] This risks the unintended application of telecoms obligations to services not designed to fall under this framework, undermining legal certainty and the objective of simplification.

To deliver genuine simplification, the single passport must operate as a self-contained and non-duplicative system:

- **No functional equivalents of registration**: once the passport is confirmed, host Member States should be prohibited from imposing additional notification, registration, authorisation, fee-based 'listing' or equivalent procedural requirements for the same activity.

[4] Art. 10 of the proposal. The proposed ODN would support the implementation of the new framework at Union level. It builds on and replaces the current BEREC Office, retaining its function of providing administrative and technical support, but with an expanded role. In addition to assisting BEREC, the ODN would support the Commission and the new Radio Spectrum Policy Body (RSPB), notably in areas such as data collection, monitoring, coordination of procedures and the operation of Union-level mechanisms (e.g. the single passport and satellite authorisation).

[5] Art. 11, ibid.

[6] Art. 9(4), ibid.

[7] Art. 9(2), ibid. This ambiguity could be interpreted broadly to include digital services beyond traditional electronic communications – including cloud infrastructure providers, content delivery networks and private networks across sectors such as finance, healthcare, energy and manufacturing – potentially leading to the application of telecoms-related obligations such as registration, fees or reporting.

- **Clear enforcement allocation and no double jeopardy**: the notifying authority should be the lead supervisory and enforcement authority for general authorisation conditions. Host intervention should be limited to clearly enumerated grounds, subject to strict thresholds and time limits, and should not result in parallel proceedings for the same facts and the same condition.
- **Legal certainty on conditions**: the passport confirmation should provide a clear and usable statement of the applicable general authorisation conditions across the covered Member States. This can be achieved through standardised references to a Union-level register maintained via the ODN, supported by harmonised templates and combined with safeguards against open-ended or iterative information requests.

BEREC guidelines and Commission implementing acts should be limited to technical templates, interoperability and information exchange, and must not introduce new substantive obligations, additional procedural steps or conditions that enable host Member States to re-create national barriers.

Our recommendations

- Strengthen the single passport so that host Member States cannot recreate additional notification, registration, fees or equivalent procedural requirements once the passport has been confirmed.
- Clarify in Art. 11 that the same breach of the same general authorisation condition should not trigger duplicative penalties or parallel proceedings in multiple Member States.
- Ensure that cooperation between notifying and host authorities is structured, time bound and limited to exceptional cases.
- Remove the reference to information society services in Art. 9(2) to ensure that the general authorisation regime remains clearly limited to public electronic communications networks and services.
- Limit BEREC guidelines and Commission implementing acts to technical and procedural interoperability, standardised templates and information exchange, excluding new substantive obligations.

Satellite authorisation

Satellite connectivity is becoming an increasingly important component of Europe's connectivity ecosystem, including for resilience, emergency communications, IoT connectivity and coverage in underserved areas. As satellite and terrestrial networks become increasingly complementary, the regulatory framework should support efficient pan-European deployment.

The DNA proposal seeks to simplify the current framework through a new Union-level authorisation architecture for satellite services.[8] Whether the proposed framework delivers genuine simplification in practice will depend on avoiding additional procedural layers, duplication with existing coordination mechanisms and institutional complexity.

Satellite operations continue to involve important national and international coordination elements, including gateway coordination, security-related requirements and cross-border interference management. Existing

[8] Arts 36–45, ibid.

European coordination and harmonisation frameworks, particularly within CEPT, have enabled streamlined deployment of satellite terminals across a broader European footprint extending beyond the Union. The effectiveness of the new framework will therefore depend on whether it materially reduces, rather than compounds, administrative complexity in practice.

Our recommendations

- Ensure that the Union satellite authorisation framework materially simplifies and streamlines existing procedures in practice and does not create additional coordination layers or duplicative requirements alongside existing national and international mechanisms.
- Preserve close alignment with existing ITU and CEPT coordination and harmonisation frameworks, including for satellite terminals and cross-border interference management.

Making spectrum policy pro-investment

Europe's connectivity gap is, to a large extent, a spectrum policy problem. For two decades, EU spectrum policy has reflected a tension between national fiscal objectives and European connectivity goals. Whilst networks are expected to scale across Europe, spectrum – their essential input – continues to be assigned through nationally driven processes with divergent conditions and timelines. This mismatch has constrained investment efficiency and delayed the deployment of advanced wireless capabilities.

The DNA addresses this by shifting towards a more investment-oriented spectrum framework. It establishes a presumption that rights of use should be granted for very long durations, including unlimited duration in principle, combined with periodic reviews and a structured renewal regime.[9] For harmonised spectrum used for wireless broadband, it introduces a strong expectation of continuity, with renewal as the default outcome and strict conditions for non-renewal or modification.[10] This represents a material improvement in long-term predictability.

The proposal also reforms spectrum governance. Under the current framework, spectrum coordination at Union level is based on voluntary and non-binding mechanisms.[11] The DNA moves towards a more structured model involving the Commission, BEREC and the new RSPB in the review of certain national assignment procedures.[12] This can improve consistency, but it also introduces additional procedural steps that may affect timing and predictability if not tightly designed.

[9] Art. 24, ibid.

[10] Art. 25, ibid.

[11] Art. 35 EECC provides for a Peer Review Forum organised by the RSPG, focused on the exchange of views and best practices, without imposing obligations on national authorities. This reflects the outcome of the EECC negotiations, during which more prescriptive EU-level scrutiny of spectrum assignment procedures, as initially proposed by the Commission, was not retained.

[12] The proposed Radio Spectrum Policy Body (RSPB) would replace the current Radio Spectrum Policy Group (RSPG). Whilst the RSPG is an advisory body that provides high-level strategic guidance to the Commission on spectrum policy, the RSPB would have a more formalised and operational role. It would be more closely integrated into regulatory procedures, including providing opinions and coordinating positions in areas such as spectrum assignment and satellite authorisation.

The DNA also enables additional mechanisms to improve coordination, including the development of common authorisation conditions and alignment of certain aspects of spectrum assignment.[13] This recognises that fragmentation in award design and timing remains a structural barrier to scale.

To support investment, the final DNA should preserve the pro-investment direction whilst incorporating necessary safeguards, including sufficiently long licence durations and predictable renewal conditions, as well as clearly defined and limited grounds for modification or non-renewal. Coordination mechanisms should reduce fragmentation without introducing delays in award processes, and spectrum fees and conditions should support rollout and network quality.

A forward-looking spectrum roadmap remains essential. Predictable availability across bands should reflect expected traffic growth and future connectivity targets. The framework should remain technology neutral and support a balanced approach across licensed and licence-exempt uses, whilst recognising the complementary roles of different technologies. In practice, connectivity is delivered through a combination of fibre, Wi-Fi, mobile and satellite networks, whose functions are increasingly complementary.

Our recommendations

- Preserve long-term investment by maintaining very long or unlimited licence durations and a strong presumption of renewal.
- Define and limit the grounds for modification or non-renewal, and apply them in a predictable manner, with safeguards and transitional arrangements, ensuring periodic reviews do not create regulatory uncertainty or enable open-ended policy or fiscal shifts.
- Use coordination mechanisms to reduce fragmentation in timing and conditions without introducing additional procedural complexity or delays in assignments.
- Ensure that spectrum fees and assignment conditions prioritise investment, rollout and network quality over short-term revenue extraction.

Transitioning from copper to fibre

Europe's transition to fibre is held back by the complexity of aligning investment cycles, market conditions and consumer outcomes across very different national contexts. Whilst fibre rollout is progressing, the economics of switching off legacy copper networks remain uneven. Premature or overly rigid intervention risks distorting incentives rather than accelerating deployment.

The DNA introduces a structured framework for copper switch-off. Member States would establish national copper switch-off plans within a common EU-level framework, with conditions governing migration including network availability, consumer protection and continuity of service.[14]

The objective – to accelerate the transition to high-capacity networks and avoid prolonged reliance on legacy infrastructure – is legitimate. However, the proposal risks becoming overly prescriptive. Fibre rollout economics vary significantly across Member States and within regions, depending on population density,

[13] Art. 22, ibid.

[14] Arts 54–61, ibid.

existing infrastructure, competitive dynamics and the role of alternative technologies.[15] A rigid EU-wide timeline could force migration before equivalent services are realistically available or affordable. Overly rigid conditions may also constrain operators' ability to manage transitions efficiently, particularly for business users and critical services that require tailored migration planning.

A more effective approach would be readiness-based and outcome-focused. The EU framework should define the objective and minimum safeguards, whilst allowing Member States and operators to determine timelines based on measurable readiness criteria – ensuring that switch-off occurs when end-users can genuinely benefit from equivalent or improved services.

Our recommendations

- Maintain the objective of accelerating fibre deployment whilst avoiding rigid EU-wide switch-off timelines disconnected from market readiness.
- Allow Member States and operators to determine transition timelines based on measurable readiness criteria (availability, affordability, competition, and user migration capability).
- Ensure that copper switch-off only occurs where end-users are guaranteed equivalent or improved service and continuity, including for business users and critical services.
- Recognise the role of complementary technologies, including fixed wireless and satellite, where they can deliver equivalent outcomes.

Enabling service innovation within a stable regulatory framework

Connectivity networks are increasingly expected to support advanced use cases such as industrial automation, connected mobility and healthcare applications. These require capabilities such as network slicing, edge computing and differentiated quality of service. The regulatory framework must provide clarity and flexibility to support innovation whilst preserving core principles such as open internet access.

The DNA integrates existing open internet rules into a single framework and maintains principles of non-discrimination, transparency and end-user rights.[16] At the same time, it allows the Commission to adopt further measures governing 'services other than internet access services,' including through implementing acts, to clarify the treatment of specialised services.[17]

Maintaining a consistent open internet framework is important. At the same time, the current proposal risks compounding uncertainty. Leaving the scope and conditions for specialised services to future implementing measures would prolong divergent interpretations, delay deployment and reduce incentives to invest in new service models.

The existing framework already provides a degree of flexibility for specialised services, provided they do not degrade the quality of general internet access. The priority should therefore be to clarify and stabilise these conditions in the primary text, rather than reopening them through secondary legislation.

[15] Technologies such as 5G fixed wireless access (FWA) can play a complementary role in enabling efficient migration in certain areas and should be taken into account.

[16] Part VI, Title II of the proposal incorporates and replaces Regulation (EU) 2015/2120.

[17] Art. 93(6), ibid.

Our recommendations

- Provide clear and stable conditions for specialised services in the primary text, consistent with the principle that specialised services must not degrade general internet access quality.
- Avoid implementing acts that would redefine substantive conditions or reopen key policy choices, which would prolong uncertainty.
- Ensure consistent interpretation and application across Member States, limiting the risk of divergent national approaches.

Resilience and security without duplication

The DNA introduces a dedicated framework on resilience and preparedness for electronic communications networks and services, centred on a Union Preparedness Plan for Digital Infrastructures developed by BEREC with the Commission and the ODN, and supported by a biennial data-gathering exercise. The objective is to build a Union-level understanding of network resilience, identify systemic vulnerabilities and improve coordination in the event of large-scale disruptions.[18]

Operators are already subject to extensive obligations under NIS2, whilst the proposed revision of the Cybersecurity Act introduces far-reaching supply chain intervention mechanisms, including restrictions on high-risk suppliers.[19] The DNA adds a further layer on top of these frameworks, resulting in a growing stack of partially overlapping obligations applied to the same infrastructure.

The biennial data-gathering mechanism illustrates this risk. Collecting detailed information on network architecture, capacity and use must be clearly linked to demonstrated gaps, with strict safeguards for confidentiality and security. Resilience policy will be undermined if new obligations duplicate existing reporting or expand disclosure of sensitive information without clear necessity.

The DNA should be redesigned around the principle that any additional reporting should be strictly gap-based, justified and proportionate.[20]

[18] Arts 4–8 of the proposal would establish a structured approach centred on cooperation and system-level readiness, requiring providers, NRAs, cybersecurity authorities and crisis management bodies to contribute to the anticipation, prevention and response to disruptions, crises or force majeure. It would also introduce obligations to ensure the continuous availability and necessary capabilities of networks and services, for emergency communications and public warning systems, and to prepare for the resilience implications of technological transitions. The Union Preparedness Plan is intended to provide a Union-wide assessment of network architecture, capacity and vulnerabilities, identify bottlenecks and single points of failure, and develop operational recommendations and crisis management practices. A biennial data-gathering exercise would require NRAs to collect information on network architecture, capacity, capabilities and use. The framework is complemented by cooperation with the Commission, ENISA and EU crisis coordination bodies, including EU-CyCLONe, to support shared situational awareness and coordinated response.

[19] COM(2026) 11 final.

[20] DIGITALEUROPE supports the EU's objective of reducing administrative burdens for businesses. In this context, the DNA should avoid introducing additional or duplicative reporting obligations. Any information requests, including in areas such as resilience and network planning, should be proportionate, targeted and limited to clearly defined objectives, building on existing data already collected under EU frameworks, in particular NIS2. This principle should also apply to other horizontal areas, such as sustainability. Companies are already subject to comprehensive reporting obligations under the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS), based on a double materiality assessment. Additional data requests at

Our recommendations

- Narrow Art. 7 to a gap-only data collection mechanism, limited to information demonstrably not already available under NIS2 or other relevant Union frameworks.
- Include strong confidentiality and security safeguards for sensitive network information, including minimisation and aggregation.
- In the absence of clear limitation, delete the standalone Art. 7 data-gathering obligation and rely on existing information collected under NIS2 and other Union instruments to support the Union Preparedness Plan.

A proportionate and harmonised regulatory scope

The DNA broadly preserves the EECC distinction between number-based and number-independent interpersonal communications services (NI-ICS), recognising that these services rely on different architectures and cannot always be subject to identical obligations.[21] This approach remains appropriate and should be maintained.

NI-ICS currently face a fragmented and legally uncertain regulatory landscape, including national data-sharing and local registration requirements that create fragmentation beyond the harmonised framework envisaged under the EECC. However, the proposed DNA does not materially address this issue, thereby falling short of its harmonisation objective. The DNA should strengthen the single market for providers in scope, including by considering recent legal developments recognising that NI-ICS also qualify as information society services under the e-Commerce Directive.[22]

The proposal preserves the possibility to impose interoperability obligations on NI-ICS to ensure end-to-end connectivity.[23] As under the EECC, it provides for a Union-level trigger for these obligations, including Commission implementing measures following BEREC consultation. Such triggers must remain evidence based, proportionate and technically realistic, taking account of the architectures of different services. The framework should also avoid overlap with other EU digital regulation applicable to the same services.[24]

The proposal expands the approach to emergency communications by allowing Member States to mandate access to emergency services from NI-ICS.[25] Any mandate must remain strictly conditional on technical

sectoral level risk duplicating existing obligations without clear added value. The DNA should therefore align with existing EU frameworks, including recent initiatives such as the Code of Conduct for the Sustainability of Telecommunications Networks, and respect the once-only principle by avoiding parallel reporting requirements.

[21] Directive (EU) 2018/1972, Arts 2(6)–(7) (definitions of interpersonal communications services) and Recital 18, explaining the distinction between number-based and number-independent services and their different characteristics.

[22] Directive 2000/31/EC. Recent German case law has highlighted the interaction between the EECC framework applicable to NI-ICS and the e-Commerce Directive's country-of-origin principle for information society services, particularly regarding the cross-border application of certain national obligations (see VG Köln, 17 June 2025, 1 L 1930/22; VG Köln, 24 July 2025, 1 L 327/23).

[23] Arts. 68(2)(c) of the proposal.

[24] Notably, the Digital Services Act (Regulation (EU) 2022/2065) and the Digital Markets Act (Regulation (EU) 2022/1925).

[25] Art. 106(1) of the proposal.

feasibility and the readiness of national public-safety answering point (PSAP) systems, including reliable routing and caller location capabilities where required.

Finally, the proposal introduces a voluntary conciliation mechanism in the interconnection ecosystem. Views within the sector remain diverse regarding both the underlying market dynamics and the potential role of regulatory intervention in this area. This mechanism should therefore be approached cautiously, with careful consideration of its necessity, proportionality and potential impact on commercial negotiations and existing market dynamics.[26]

Our recommendations

- Ensure that NI-ICS interoperability obligations remain subject to clear necessity, proportionality and evidence-based triggers, and do not overlap with or duplicate obligations under other EU digital frameworks.
- Ensure that any mandate extending emergency communication obligations to NI-ICS remains conditional on technical feasibility and PSAP readiness, including reliable routing and caller location capabilities.
- Ensure that any conciliation mechanism is based on clear evidence of necessity and market failure, remains proportionate and takes into account the diversity of business models across the connectivity ecosystem.

Keeping universal service targeted and reducing fragmentation in end-user rules

On universal service and end-user rights, the DNA largely preserves the EECC framework rather than changing the policy model.[27] Its added value therefore depends on whether it reduces national divergence in practice and avoids increasing burdens through prescriptive EU-level detail and follow-on measures.

Universal service should remain strictly limited to ensuring access to **basic broadband** at an affordable price, to avoid market distortions and investment disincentives. Remaining gaps should be addressed primarily through **targeted, technology-neutral public funding** and demand-side tools such as **voucher schemes**, with Member States required to demonstrate the **need, effectiveness and proportionality** of any new or modified obligations.

The DNA's stronger harmonisation clauses (limiting divergent national consumer rules) are welcome in principle, but should be paired with an audit and phase-out of national gold plating and a mechanism to prevent new gold plating in areas under EU review. Key rights such as switching and number portability should be preserved, whilst extending consumer protections to SMEs would have unintended impacts on B2B contracts and waiver burdens.[28]

Our recommendations

[26] Part VIII, Title IV, ibid.

[27] Part VI, Titles I and III, ibid.

[28] Via Art. 99, including Arts 97(2), 97(3) and 97(5).

- Keep universal service limited; address gaps via targeted funding and vouchers, not broad universal service obligations expansion.
- Deliver real simplification: audit/phase out gold plating and prevent new gold plating.
- Re-target SME extensions (Art. 99) to avoid burdens and contract disruption.

Governance and implementation

The DNA aims to reshape the governance of the EU connectivity framework. Moving from a Directive to a Regulation can improve consistency and reduce fragmentation, particularly in spectrum and authorisation. The proposal strengthens the EU-level role of existing bodies and reconfigures governance structures, notably by reconstituting the BEREC Office as the ODN and transforming the RSPG into the RSPB. Whilst these bodies do not receive binding decision-making powers, they are embedded more deeply into processes that shape national measures and market outcomes.

A central feature of the proposed governance is the increased reliance on secondary legislation. Compared with the EECC, the DNA substantially expands the number of delegated and implementing acts to define the detailed operation of the framework.[29] Whilst secondary measures may be necessary for technical implementation, excessive use of implementing and delegated acts delays operability and creates procedural complexity.

To support simplification and predictability, the final DNA should follow a clear governance principle: **essential elements must be defined in the Regulation**, whilst secondary legislation should be limited to technical and operational detail.

Our recommendations

- Ensure that EU-level coordination mechanisms remain efficient and do not introduce additional procedures. The integration of the ODN and the RSPB into regulatory processes should not result in sequential consultation steps that may delay the adoption of Commission decisions.
- Ensure that essential implementing acts are limited, prioritised and sequenced. Only a reduced set of core implementing acts should be required for the framework to function and should be adopted early;[30] non-essential or duplicative empowerments should be removed or consolidated;[31] governance-related implementing acts should be streamlined into a limited number of horizontal measures to avoid unnecessary procedural complexity.[32]

[29] Based on an article-by-article comparison, the EECC contains a limited number of implementing act empowerments (around nine) and three delegated act empowerments, whereas the DNA proposal envisages around 30 implementing acts and six delegated acts. This amounts to more than a tripling of implementing powers and a doubling of delegated powers.

[30] In particular those governing Union authorisation conditions (Arts 38–39), procedures (Art. 40) and enforcement (Art. 43).

[31] Including those relating to additional spectrum conditions (Art. 30(11)), detailed coexistence arrangements (Art. 45(3)) or service-level specifications (Art. 22).

[32] Including Arts 11, 14, 17, 18, 182–187.

- Remove or narrow open-ended empowerments that allow new obligations to be introduced without clear limits.[33]

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[33] Provisions such as Art. 39(4)(g) (allowing 'any additional conditions necessary for Union policies') should be strictly circumscribed or deleted as they allow substantive requirements to be defined after adoption of the Regulation.

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