

EUTC Response to European Commission questionnaire on the European Electronic Communications Code

The European Commission is conducting a review of the EECC (European Electronic Communications Code). The question is whether it has achieved its four main objectives: promotion of connectivity and investment, effective competition, fostering the internal market, and promoting citizens' interests? In response, the European Utilities Telecom Council has expressed its views, the main points of which are summarised below.

- **Promotion of Connectivity and Investment**

Independent of any assessment of whether the EECC has promoted connectivity and investment in public telecommunications networks, by focusing purely on public networks, it has potentially discouraged investment in specialized private networks. This is due to their **lack of access to suitable radio spectrum and fair and reasonable access to public telecommunications network infrastructure**.

- **Effective Competition**

Because specialized private networks are often denied **access to suitable radio spectrum at an appropriate cost**, private networks are unable to compete effectively with public networks, which benefit from guaranteed access to large amounts of spectrum. This places private networks at a competitive disadvantage despite their critical role in sectors such as energy, transportation, and emergency services.

- **Fostering the Internal Market**

EUTC has observed that the **lack of access to suitable spectrum at an appropriate cost**, especially for wide-area networks in the **400 MHz bands**, has **impeded the development of an ecosystem for the types of equipment required by critical services** such as utilities. As a result, Europe is often reliant on other parts of the world to develop the necessary ecosystems, disadvantaging European suppliers who lack a vibrant home market for launching specialized products.

- **Promoting Citizens' Interests**

Restricting access to telecom resources for specialized private networks forces critical entities such as utilities to **depend on public networks** for a larger proportion of their telecommunications needs. These public networks often **lack the resilience characteristics required by utilities**—such as **power resilience and mission-critical reliability**—leading to **increased risks for European citizens and businesses** that rely on essential utility services.

From a broader perspective and based on EU accompanying dashboards, we acknowledge **significant efforts and progress toward the targets set by the Digital Agenda**, with utilities **contributing through infrastructure sharing and cost optimization**.

However, in addressing key economic actors and common societal services (**health, education, energy, etc.**)—which indirectly impact citizens—there is a pressing need to **ensure the adequate level of resilience and security of networks and services.**

While **effective competition mainly addresses the mass market**, there remains a **significant trade-off in meeting the quality parameters required by critical or essential services.** This highlights a **noticeable gap in regulation**, particularly in ensuring that Communication Service Providers (**CSPs**) are **held accountable for resilience and service continuity when supplying critical user segments.**

With a special focus on **energy and digital coupling**, EUTC advocates for a **regulatory framework that addresses cross-sectoral risks and supports the concept of dedicated, purpose-built private networks** to enhance the resilience and efficiency of Europe’s critical infrastructures.

The European Utilities Telecom Council (EUTC)

The European Utilities Telecom Council (EUTC) is the leading European Utilities trade association dedicated to informing its members and influencing policies on how telecommunication solutions and associated challenges can support the future smart infrastructures and the related policy objectives through the use of innovative technologies, processes, business insights and professional people.



Typical utility distribution control room

This is combined with sharing best practices and learning from across the EUTC and the UTC global organization of telecommunication professionals within the field of utilities and other critical infrastructure environments and associated stakeholders.

CONTACT DETAILS:

Adrian Grilli
Technical Manager
European Utilities Telecom Council AISBL (EUTC)
EUTC, 22 avenue de la Toison d’Or, 1050 Brussels, Belgium
email: adrian.grilli@EUTC.org
+44 7831 683085
www.eutc.org