

Analysis of the IMCO Draft Opinion

3. July 2026

EXECUTIVE SUMMARY

On 9th of June 2026, the IMCO Committee proposal for the Digital Networks Act (DNA) was leaked. This overhaul of the telecommunications regulatory framework, especially the provisions detailing a mandatory conciliation mechanism have major impacts on net neutrality, consumer rights and the future of the open internet. This analysis highlights the biggest risks and key takeaways from a civil society perspective.

Key Concerns:

- Amendments 36-41: We are extremely alarmed about the proposed changes to net neutrality provisions in Article 93. Those would drastically deteriorate the consumer protections and introduce dangerous loopholes for paid fast lanes and preferential treatment.
- Amendments 4, 57-58, 61, 64-74: The mandatory conciliation mechanism is nothing other than the fair share payment obligation for the few, very large telecom companies. This would hurt every sector in society besides those very large telecom companies. Consumers would be hurt in their ability to use the internet freely if their connection to a service is dependent on the ability of that service to pay for connectivity to every (large) ISP. This would hurt European SMEs, smaller telcos, public and private broadcasters and freedom and many others.
- Amendment 9: We caution against introducing language on indiscriminate mass surveillance in the form of data retention provisions. While ambiguous, this language should be removed.

Epicenter.works welcomes the draft opinion, but would like to make some comments on selected proposed amendments below. The left column repeats the Commission proposal; the right column contains the amendments proposed by the rapporteur, Stéphanie Yon-Courtin. Our comments can be found below. For ease of reading, the headings are highlighted:

- **green (++)** for amendments which we welcome
- **yellow (+)** for amendments which pursue good aims, but could benefit from further suggested improvements;
- **red (-)** for amendments which in our view should be reconsidered.
- **blue (~)** for amendments to which we take no position
- **(!)** signifies amendments that are of severe importance in our opinion.

Voting Recommendation

Amendment 1: +1	Amendment 21: ++	Amendment 42: ++	Amendment 63: ++
Amendment 2: -	Amendment 22: ++	Amendment 43: ~	Amendment 64: -!
Amendment 3: ++	Amendment 23: +	Amendment 44: -	Amendment 65: -!
Amendment 4: -!	Amendment 24: -	Amendment 45: -	Amendment 66: -!
Amendment 5: +	Amendment 25: ++	Amendment 46: ++	Amendment 67: -!
Amendment 6: ++	Amendment 26: ++	Amendment 47: ++	Amendment 68: -!
Amendment 7: ~	Amendment 27: ++	Amendment 48: ++	Amendment 69: -!
Amendment 8: ++	Amendment 28: ~	Amendment 49: ~	Amendment 70: -!
Amendment 9: -!	Amendment 29: ++	Amendment 50: ~	Amendment 71: -!
Amendment 10: ~	Amendment 30: ++	Amendment 51: ~	Amendment 72: -!
Amendment 11: ~	Amendment 31: +	Amendment 52: ~	Amendment 73: -!
Amendment 12: ~	Amendment 32: +	Amendment 53: ~	Amendment 74: -!
Amendment 13: ~	Amendment 33: -	Amendment 54: ~	Amendment 75: ~
Amendment 14: ~	Amendment 34: ~	Amendment 55: ++	Amendment 76: ~
Amendment 15 (+)	Amendment 35: -	Amendment 56: ++	Amendment 77: ~
Amendment 16: ++	Amendment 36: -!	Amendment 57: -!	Amendment 78: ~
Amendment 17: ++	Amendment 37: -!	Amendment 58: -!	Amendment 79: ~
Amendment 18: ++	Amendment 38: -!	Amendment 59: -	Amendment 80: ~
Amendment 19: ++	Amendment 39: -!	Amendment 60: ++	
Amendment 20: ++	Amendment 40: -!	Amendment 61: -!	
	Amendment 41: -!	Amendment 62: ++	

This document focuses on the IMCO draft opinion. Follow our net neutrality document pool or topical page for subsequent publications.¹ Our non profit organisation epicenter.works, has been working on net neutrality since 2012 and represents user interests. We are independent of corporate interests and political parties, dedicated to facts and always strive to provide efficient rights-based solutions.²

Amendment 1: +1

2026/0013(COD): Recital 58 (+)	
(58) It is important to ensure the effectiveness of the Single Passport regime. Therefore, national regulatory authorities or other competent authorities of the Member States should be required to cooperate among themselves to support BEREC and the ODN in developing and updating of guidelines and information resources on the harmonised application of general authorisation conditions in the Member States. For this purpose, Member	It is important to ensure the effectiveness of the Single Passport regime. Therefore, national regulatory authorities or other competent authorities of the Member States should be required to cooperate among themselves to support BEREC and the ODN in developing and updating of guidelines and information resources on the harmonised application of general authorisation conditions in the Member States. For this purpose, Member States

1 https://epicenter.works/en/documents?tx_news_pi1%5BoverwriteDemand%5D%5Btags%5D=4 and <https://epicenter.works/en/thema/net-neutrality>

2 <https://epicenter.works/en/about-us>

States should designate national single contact points.	should designate national regulatory authorities or other national competent authorities as national single contact points.
Comments: We welcome NRAs or other national authorities serving as contact points. It would be even better to remove “other national competent authorities”, which would increase the independence of the contact points.	

Amendment 2: -

2026/0013(COD): Recital 62 (-)	
<p>(62) The national regulatory authority of the Member State of notification should have the power to impose penalties for the breach of the general authorisation conditions, provided that the national regulatory authority where networks or services are provided has not already imposed penalties for the breach of the same conditions. Penalties should be imposed in accordance with national law and could include, in case of serious breach, and where necessary after consultation with the regulatory authorities of the affected Member States, the withdrawal of the right to provide networks and services in all the Member States covered by the Single Passport. A serious breach could be found, for example, where non-compliance with one or more general authorisation conditions persists despite the remedial actions undertaken by the national regulatory authority or other competent authority. Only in exceptional cases, when a national regulatory authority of the Member State where the networks or services are provided concluded that the breach of the authorisation conditions may have a negative impact in its territory on the grounds of national security or public interest, it should have the right to impose penalties within its jurisdiction. Such exceptional enforcement measure should be taken in coordination with the relevant competent authorities of the Member State of notification.</p>	<p>The national regulatory authority of the Member State where the electronic communications networks or services are provided should have the power to impose penalties for the breach of the general authorisation conditions. Penalties should be imposed in accordance with national law and could include, in case of serious breach, and where necessary after consultation with the regulatory authorities of the affected Member States, the withdrawal of the right to provide networks and services in all the Member States covered by the Single Passport. A serious breach could be found, for example, where non-compliance with one or more general authorisation conditions persists despite the remedial actions undertaken by the national regulatory authority or other competent authority. When a national regulatory authority of the Member State where the networks or services are provided concluded that the breach of the authorisation conditions may have a negative impact in its territory on the grounds of national security or public interest, it should have the right to impose penalties within its jurisdiction.</p>

Comment: The amendment weakens this safeguard by deleting the limitation that enforcement on grounds of national security or public interest should occur *only in exceptional cases*. Given the broad and potentially divergent interpretation of these concepts across Member States, removing this threshold increases the risk of disproportionate or inconsistent enforcement.

Amendment 3: ++

2026/0013(COD): Recital 230 (++)	
<p>(230) A fundamental requirement of universal service is to ensure that all consumers have access at an affordable price to an adequate internet access and voice communications services at a fixed location. Where there are limitations for access Member States may also consider to ensure affordability of adequate internet access and voice communications services other than at a fixed location, where they consider that this is necessary to ensure consumers' full social and economic participation in society. Particular attention should be paid to ensuring that consumers with disabilities have equivalent access at a fixed location. There should be no limitations on the technical means by which the adequate internet access and voice communications services at a fixed location are provided, allowing for wired or wireless technologies in a technologically neutral way, nor any limitations on which undertakings provide part or all of universal service obligations.</p>	<p>A fundamental requirement of universal service is to ensure that all consumers have access at an affordable price to an adequate broadband internet access and voice communications services at a fixed location. Where there are limitations for access Member States may also consider to ensure affordability of adequate internet access and voice communications services other than at a fixed location, where they consider that this is necessary to ensure consumers' full social and economic participation in society. Particular attention should be paid to ensuring that consumers with disabilities have equivalent access at a fixed location. There should be no limitations on the technical means by which the adequate internet access and voice communications services at a fixed location are provided, allowing for wired or wireless technologies in a technologically neutral way, nor any limitations on which undertakings provide part or all of universal service obligations.</p>
<p>Comments: We welcome the addition as it adds a qualifier of sufficient capacity for the universal service.</p>	

Amendment 4: -!

2026/0013(COD): Recital 405 (-!)	
<p>(405) In order to promote effective cooperation between providers of electronic communications networks and other undertakings active in the electronic communications or closely related sectors, it is appropriate to establish a voluntary conciliation procedure to facilitate</p>	<p>In order to promote effective cooperation between providers of electronic communications networks and other undertakings active in the electronic communications or closely related sectors, it is appropriate to establish a mandatory conciliation procedure to ensure dialogue</p>

<p>dialogue on technical and commercial arrangements. Such a procedure provides a structured and neutral forum, supported by national regulatory authorities in cooperation with BEREC to encourage amicable solutions and reduce the likelihood of protracted disputes and enhance regulatory consistency. In order to ensure a coherent and harmonised application of this voluntary conciliation procedure across the Union, close cooperation with BEREC should be ensured throughout the procedure, including in the conciliation meeting and its report. In particular, BEREC should provide an opinion on individual cases brought forward by the parties in the context of conciliation procedures led by national regulatory authorities. In addition, the guidelines on ecosystem cooperation should provide guidance to national regulatory authorities on the assessment of the relevant commercial and technical matters, as well as on options for effective cooperation between the parties. By encouraging cooperation and mutual understanding, this procedure can contribute to the more efficient, economically sustainable and reliable delivery of IP traffic, support interoperability and quality of services, and facilitate the deployment of innovative services based on collaboration, while preserving contractual freedom.</p>	<p>on technical and commercial arrangements. Such a procedure provides a structured and neutral forum, supported by national regulatory authorities in cooperation with BEREC to encourage amicable solutions and reduce the likelihood of protracted disputes and enhance regulatory consistency. In order to ensure a coherent and harmonised application of this mandatory conciliation procedure across the Union, close cooperation with BEREC should be ensured throughout the procedure, including in the mandatory conciliation meeting and its report. In particular, BEREC should provide an opinion on individual cases brought forward by the parties in the context of conciliation procedures led by national regulatory authorities. In addition, the guidelines on ecosystem cooperation should provide guidance to national regulatory authorities on the assessment of the relevant commercial and technical matters, as well as on options for effective cooperation and resolution of disputes between the parties. By encouraging cooperation and mutual understanding, this procedure can contribute to the more efficient, economically sustainable and reliable delivery of IP traffic, support interoperability and quality of services, and facilitate the deployment of innovative services based on collaboration, while preserving contractual freedom.</p>
<p>Comments: This changes the nature of the proposed cooperation framework by replacing a voluntary conciliation mechanism with a mandatory one. The Commission proposal seeks to provide an optional forum for dialogue between market participants while preserving contractual freedom. By making participation mandatory and re-framing the mechanism towards the resolution of disputes, the amendment introduces unnecessary regulatory intervention into commercial negotiations between private parties. Mandatory conciliation risks becoming a regulatory gateway for intervention. It creates pressure on parties to participate in regulatory proceedings even where voluntary commercial negotiations remain the appropriate means of reaching agreement. Mandatory participation in regulatory conciliation is difficult to reconcile with genuinely voluntary commercial negotiations and risks laying the groundwork for future regulatory intervention in disputes.</p>	

Amendment 5: +

2026/0013(COD): Article 3 para 1 point a (+)	
(a) reinforce the competitiveness of the connectivity sector and industry at-large by facilitating investments in advanced digital infrastructures, including cloud and AI based solutions, by enabling innovative services, including quality-assured and reliable services, and by facilitating cooperation among players in the broader digital ecosystem;	reinforce the competitiveness and the sovereignty of the Union's connectivity sector and industry at-large by facilitating investments in advanced and sovereign digital and technological infrastructures, including cloud and AI based solutions, by enabling innovative services, including quality-assured and reliable services, and by facilitating cooperation among players in the broader digital ecosystem;
Comments: We welcome the focus on digital sovereignty.	

Amendment 6: ++

2026/0013(COD): Article 3 para 1 point b (++)	
(b) develop a single market for electronic communications facilitating network operation and service provision across borders within the Union, the development of trans-European digital networks and the provision of innovative electronic communications networks and services including pan-European satellite communications services	develop a single market for electronic communications facilitating network operation and service provision across borders within the Union, the development of trans-European digital networks and the provision of innovative, competitive, safe and high-quality electronic communications networks and services including pan-European satellite communications services
Comments: We welcome the added qualifiers, in particular the focus on competition in the telecoms market.	

Amendment 7: ~

2026/0013(COD): Article 9 para 2 point a (new) (-)	
	2a. The general authorisation regime shall not apply to providers of electronic communications networks or services for services and networks that are already authorised.
Comments: -	

Amendment 8: ++

2026/0013(COD): Article 9 para 4 subpara 1 point d (++)	
(d) compliance, as applicable to the provider, with cybersecurity rules,	compliance, as applicable to the provider, with cybersecurity rules, including ICT

including ICT supply chain security requirements imposed in accordance with the Cybersecurity Act which is to replace Regulation (EU) 2019/881 of the European Parliament and of the Council	supply chain security requirements imposed in accordance with the Cybersecurity Act which is to replace Regulation (EU) 2019/881 of the European Parliament and of the Council and possible Member States provisions ensuring a higher level of cybersecurity
Comments: We welcome the added flexibility for member states to increase the cybersecurity obligations on national level.	

Amendment 9: -!

2026/0013(COD): Article 9 para 4 subpara 1 point e (-!)	
(e) enabling of access to data by law enforcement and judicial authorities, including for lawful interception and data retention in accordance with applicable Union or national legislation, in the Member States in which the service is provided, which complies with Union law , as applicable to the provider;	retaining and giving access to data by law enforcement and judicial authorities, including for lawful interception and data requisition in accordance with national legislation, in the Member States in which the service is provided, as applicable to the provider;
Comments: This amendment tries to add indiscriminate mass surveillance to the general authorization regime. Data retention has been found illegal by the European Court of Justice in multiple judgements, because it is incompatible with the Charter of Fundamental Rights. The underlying EU directive (2006/24/EC) has been annulled in 2014 based on our court case (C-594/12).	

Amendment 10: ~

2026/0013(COD): Article 10 para 4: (~)	
4. The notified regulatory authority shall transmit the notification received to the ODN without undue delay. Where the notification concerns the start of provision of networks and services in several Member States, the ODN shall transmit it for information to the competent authorities of the other Member States where the provider intends to operate without undue delay.	The notified regulatory authority shall transmit the notification received to the ODN without undue delay, and at the latest within 3 working days . Where the notification concerns the start of provision of networks and services in several Member States, the ODN shall transmit it for information to the competent authorities of the other Member States where the provider intends to operate without undue delay.
Comments: -	

Amendment 11: ~

2026/0013(COD): Article 10 para 7: (~)	
7. Once the notification is confirmed,	Once the notification is confirmed, the

the provider may exercise the rights derived from the general authorisation and start the activity, where necessary subject to the provisions on the rights of use under this Regulation.	provider shall exercise the rights derived from the general authorisation and start the activity, where necessary subject to the provisions on the rights of use under this Regulation.
Comments: -	

Amendment 12: ~

2026/0013(COD): Article 10 para 8: (↔)	
8.The ODN shall maintain a publicly available Union database of the notifications submitted to the national regulatory authorities. The notified authorities shall update the information about all received notifications in the database at least every two months.	The ODN shall maintain a publicly available Union database of the notifications submitted to the national regulatory authorities. The notified authorities shall update this database every time they receive a new notification.
Comments: -	

Amendment 13: ~

2026/0013(COD): Article 10 para 9: (↔)	
9.For electronic communications networks and services notified before [6 months after the date of entry into force of this Regulation], no new notification shall be required. Providers may notify to the notified national regulatory authority to obtain a new general authorisation for existing networks or services under the Single Passport procedure. When deploying new electronic communications networks or services, providers shall be subject to the Single Passport procedure concerning these new networks or services.	For electronic communications networks and services notified before [6 months after the date of entry into force of this Regulation], no new notification shall be required. When deploying new electronic communications networks or services, providers shall be subject to the Single Passport procedure concerning these new networks or services.
Comments: -	

Amendment 14: ~

2026/0013(COD): Article 11 para 1: (↔)	
1.By [6 months after the date of entry into force of this Regulation], BEREC shall, in close cooperation with the Commission and other competent authorities, including contact points	By [6 months after the date of entry into force of this Regulation], BEREC shall, in close cooperation with the Commission and national regulatory authorities or other national competent authorities

<p>designated in accordance with paragraph 2 of this Article, publish guidelines to ensure that all the conditions listed in Article 9(4) are applied in a coherent, non-discriminatory and proportionate manner and are accessible to providers via the ODN webpage.</p>	<p>designated as single contact points in accordance with paragraph 2 of this Article, publish guidelines to ensure that all the conditions listed in Article 9(4) are applied in a coherent, non-discriminatory and proportionate manner and are accessible to providers via the ODN webpage.</p>
<p>Comments: -</p>	

Amendment: 15 (+)

<p>2026/0013(COD): Article 11 para 2: (+)</p>	
<p>2. Each Member State shall designate a national single contact point tasked with communicating with the ODN and with maintaining up-to-date information about the national legislation and procedures applicable to the provision of electronic communications networks and services, in particular those related to . authorisation conditions, including the conditions regarding cybersecurity, access to data and data protection and the obligations laid down in this Regulation.</p>	<p>Each Member State shall designate a national regulatory authority or other national competent authority as the single contact point tasked with communicating with the ODN and with maintaining up-to-date information about the national legislation and procedures applicable to the provision of electronic communications networks and services, in particular those related to general authorisation conditions, including the conditions regarding cybersecurity, access to data and data protection and the obligations laid down in this Regulation or related to national legislation which complies with Union law.</p>
<p>Comments: We welcome the added flexibility for national legislation, but we would suggest limiting the national contact points to independent national regulatory authorities only. See Amendment 1.</p>	

Amendment 16: ++

<p>2026/0013(COD): Article 11 para 2 (++)</p>	
<p>[inserted]</p>	<p>2a. The national competent authorities shall cooperate with and assist each other as necessary. That cooperation shall entail, at least, that:</p> <p>(a) national competent authorities shall exchange information and best practices related to the enforcement of this Regulation;</p> <p>(b) national competent authorities shall consult, where appropriate, the competent authorities of other Member States on the</p>

	<p>enforcement measures;</p> <p>(c) a national competent authority shall, upon receipt of a substantiated request from another national competent authority, make best efforts to provide mutual assistance so that the supervisory or enforcement measures can be implemented in an effective, efficient and consistent manner.</p>
<p>Comments: We welcome this amendment as it provides a much needed basis for the cooperation among regulators across sectors and borders. In the past we have seen such collaboration taking a long time, for example in the case of BEREC and EDPB working together on establishing positions on Deep Packet Inspection.</p>	

Amendment 17: ++

2026/0013(COD): Article 11 para 3 (++)	
<p>The procedures concerning notification, confirmation for start of activities and mutual assistance for enforcement and the arrangements for the exchange of information between national competent authorities and the ODN in accordance with Regulation (EU) 2024/903 may be further specified by the Commission by means of implementing acts. Those implementing acts shall be adopted in accordance with the procedure referred to in Article 199(4).</p>	<p>The procedures concerning notification, confirmation for start of activities, cooperation and mutual assistance for enforcement and the arrangements for the exchange of information between national competent authorities and the ODN in accordance with Regulation (EU) 2024/903 shall be further supplemented by the Commission by means of delegated acts. Those delegated acts shall be adopted in accordance with the procedure referred to in Article 198.</p>
<p>Comments: We welcome the switch from implementing to delegated acts to ensure the Parliament is better represented.</p>	

Amendment 18: ++

2026/0013(COD): Article 11 para 4 (++)	
<p>4. Without prejudice to the enforcement powers of Member States concerning applicable law in their jurisdiction, under the Single Passport regime the national regulatory authority of the Member State of notification shall have the power to impose penalties for breach of the authorisation conditions. In case of a serious breach, possible measures, where necessary after consultation with the regulatory authorities</p>	<p>Without prejudice to the enforcement powers of Member States concerning applicable law in their jurisdiction, under the Single Passport regime the national regulatory authority of the Member State where the electronic communications networks or services are provided shall have the power to impose penalties within its jurisdiction for breach of the authorisation conditions. In case of a serious breach, notably where the breach</p>

<p>of the affected Member States, shall include the withdrawal of the right to operate in the Member State or Member States covered by the Single Passport.</p>	<p>may have an impact on the national security or public interest of the Member State affected, possible measures, where necessary after consultation with other national regulatory authorities in the case of electronic communications networks and services that are provided in several Member States, shall include the withdrawal of the right to operate in the Member State or Member States covered by the Single Passport.</p>
<p>Comments: We welcome this amendment in order to uphold the power and prerogative of NRAs over their territory.</p>	

Amendment 19: ++

<p>2026/0013(COD): Article 11 para 4 (++)</p>	
	<p>4a. All measures taken and penalties imposed by Member States in case of serious breaches of the authorisation conditions shall be communicated without undue delay to other Member States, the ODN and the Commission. The ODN shall maintain a database of adopted measures and penalties.</p>
<p>Comments: We welcome the added transparency concerning adopted measures.</p>	

Amendment 20: ++

<p>2026/0013(COD): Article 11 para 5 (++)</p>	
<p>5. Where the national regulatory authority of the Member State where the electronic communications networks or services are provided concludes that the breach of the authorisation conditions may have a serious negative impact in its territory on the grounds of national security or public interest, it shall have the right to impose penalties within its jurisdiction, and where appropriate, after consultation with relevant authorities of the Member State of notification.</p>	<p>deleted</p>
<p>Comments: See above.</p>	

Amendment 21: ++

2026/0013(COD): Article 87 para 1 (++)	
1.All consumers in the Union shall be entitled to have access to an affordable and adequate internet access service and to voice communications services at the quality specified in their territories, at a fixed location.	All consumers in the Union shall be entitled to have access to an affordable and adequate broadband internet access service and to voice communications services at the quality specified in their territories, at a fixed location.
Comments: We welcome the addition as it adds a qualifier of sufficient capacity for the universal service.	

Amendment 22: ++

2026/0013(COD): Article 87 para 2 subpara 1 (++)	
Each Member State shall, in light of the minimum bandwidth enjoyed by the majority of consumers in their territory, and taking into account the BEREC guidelines as provided for in the second subparagraph of this paragraph, define the adequate internet access service referred to in paragraph 1 with a view to ensuring bandwidth necessary for social and economic participation in society.	Each Member State shall, in light of the minimum bandwidth enjoyed by the majority of consumers in their territory, and taking into account the BEREC guidelines as provided for in the second subparagraph of this paragraph, define the adequate broadband internet access service referred to in paragraph 1 with a view to ensuring bandwidth necessary for social and economic participation in society.
Comments: We welcome the addition as it adds a qualifier of sufficient capacity for the universal service.	

Amendment 23: +

2026/0013(COD): Article 87 para 2 subpara 2 (+)	
By [12 months after the date of entry into force of this Regulation], BEREC shall, after consulting stakeholders, and in close cooperation with the Commission, taking into account available Commission (Eurostat) data, issue guidelines to support the definition of adequate internet access service referred to in paragraph 1 and the specification of the bandwidth necessary for social and economic participation in society. The guidelines shall be updated regularly to reflect technological advances and changes in consumer usage patterns.	By [12 months after the date of entry into force of this Regulation], BEREC shall, after consulting stakeholders and national regulatory authorities , and in close cooperation with the Commission, taking into account available Commission (Eurostat) data, issue guidelines to support the definition of adequate broadband internet access service referred to in paragraph 1 and the specification of the bandwidth necessary for social and economic participation in society. The guidelines shall be updated regularly to reflect technological advances and changes in consumer usage patterns.

Comments: BEREC consists of national regulators and it is unclear to us how the additional consultation obligation would improve the status quo in practice besides adding more red tape and checkmark exercises. We welcome the addition as it adds a qualifier of sufficient capacity for the universal service.

Amendment 24: -

2026/0013(COD): Article 88 para 1 (-)

1. National regulatory authorities in coordination with other competent authorities shall monitor **annually** the evolution and level of retail prices of the services referred to in Article 87(1) available on the market, in particular in relation to national prices and national consumer income.

National regulatory authorities in coordination with other competent authorities shall monitor **every two years** the evolution and level of retail prices of the services referred to in Article 87(1) available on the market, in particular in relation to national prices and national consumer income.

Comments: Reducing the monitoring obligation for retail prices can have significant negative consequences on affordable internet.

Amendment 25: ++

2026/0013(COD): Article 88 para 2 (++)

2. Where Member States establish that, in light of national conditions, retail prices for the services referred to in Article 87(1) are not affordable, because consumers with low income or special social needs are prevented from accessing such services, they shall take measures to ensure affordability for such consumers of adequate internet access service and voice communications services at least at a fixed location.

Where Member States establish that, in light of national conditions, retail prices for the services referred to in Article 87(1) are not affordable, because consumers with low income or special social needs are prevented from accessing such services, they shall take measures to ensure affordability for such consumers of adequate **broadband** internet access service and voice communications services at least at a fixed location **and may provide direct social support or equivalent income-support mechanisms for eligible consumers.**

Comments: We welcome the support for low-income households for affordability of internet access. We still also welcome the addition as it adds a qualifier of sufficient capacity for the universal service.

Amendment 26: ++

2026/0013(COD): Article 88 para 3 subpara 1 (++)

Where Member States decide to require tariff options or packages, these shall be offered by all providers. These offers shall be easily accessible **to** consumers with low income or special social needs. National

Where Member States decide to require tariff options or packages, these shall be offered by all providers. These offers shall be easily accessible **and transparent for** consumers with low income or special

<p>regulatory authorities in coordination with other competent authorities shall ensure, where applicable, that the conditions under which undertakings provide tariff options or packages are fully transparent and are published and applied in accordance with the principles of non-discrimination and efficiency.</p>	<p>social needs. National regulatory authorities in coordination with other competent authorities shall ensure, where applicable, that the conditions under which undertakings provide tariff options or packages are fully transparent and are published and applied in accordance with the principles of non-discrimination and efficiency. By [12 months after the date of entry into force of this Regulation], BEREC shall issue guidelines on the accessibility and transparency of tariff options or packages for consumers with low income or special social needs.</p>
<p>Comments: We welcome the added transparency for low income households.</p>	

Amendment 27: ++

<p>2026/0013(COD): Article 88 para 3 subpara 2 (++)</p>	
<p>Consumers entitled to the tariff options or packages referred to in the first subparagraph of this paragraph shall have a right to conclude a contract with a provider of adequate internet access service and voice communications services.</p>	<p>Consumers entitled to the tariff options or packages referred to in the first subparagraph of this paragraph or direct social support or equivalent income-support mechanisms as referred to in Article 88 (2) shall have a right to conclude a contract with a provider of adequate broadband internet access service and voice communications services.</p>
<p>Comments: We welcome the support for low-income households for affordability of internet access. We still also welcome the addition as it adds a qualifier of sufficient capacity for the universal service.</p>	

Amendment 28: ~

<p>2026/0013(COD): Article 88 para 3 subpara 3 (~)</p>	
<p>When a consumer so requests, the contract shall be limited to voice communications services.</p>	<p>Only when the eligible consumer so requests, the contract shall be limited to voice communications services.</p>
<p>Comments: -</p>	

Amendment 29: ++

<p>2026/0013(COD): Article 89 (++)</p>	
<p>Defining adequate internet access service, necessary bandwidth, criteria and methodology for affordability</p>	<p>Defining adequate broadband internet access service, necessary bandwidth, criteria and methodology for affordability</p>

Comments: We welcome the addition as it adds a qualifier of sufficient capacity for the universal service.

Amendment 30: ++

2026/0013(COD): Article 89 para 1 (++)

The Commission may, taking into account technological advances and changes in consumer usage patterns, adopt implementing acts to determine the methodology to defining the adequate internet access service, including the bandwidth necessary for social and economic participation in society referred to in Article 87 in light of national conditions. The implementing acts shall also include criteria and methodology to be considered by the national regulatory authorities in coordination with other competent authorities for establishing whether the retail prices of the services referred to in Article 87(1) are affordable for consumers with low income or special social needs referred to in Article 88.

The Commission may, taking into account technological advances and changes in consumer usage patterns, adopt implementing acts to determine the methodology to defining the adequate **broadband** internet access service, including the bandwidth necessary for social and economic participation in society referred to in Article 87 in light of national conditions. The implementing acts shall also include criteria and methodology to be considered by the national regulatory authorities in coordination with other competent authorities for establishing whether the retail prices of the services referred to in Article 87(1) are affordable for consumers with low income or special social needs referred to in Article 88.

Comments: We welcome the addition as it adds a qualifier of sufficient capacity for the universal service.

Amendment 31: +

2026/0013(COD): Article 91 para 1 (+)

In providing facilities and services additional to those referred to in Article 87, providers of an adequate internet access service and of voice communications services in accordance with Articles 87, 88 and 90 shall establish terms and conditions in such a way that the eligible **end-user** is not obliged to pay for facilities or services which are not necessary or not required for the service requested.

In providing facilities and services additional to those referred to in Article 87, providers of an adequate **broadband** internet access service and of voice communications services in accordance with Articles 87, 88 and 90 shall establish terms and conditions in such a way that the eligible **consumer** is not obliged to pay for facilities or services which are not necessary or not required for the service requested.

Comments: We welcome the addition as it adds a qualifier of sufficient capacity for the universal service. The replacement of "end-user" to "consumer" removes clarity.

Amendment 32: +

2026/0013(COD): Article 91 para 2 introductory part (+)	
Providers of an adequate internet access service and of voice communications services referred to in Article 87 that provide services pursuant to Article 88 shall offer the following specific facilities and services to consumers benefiting from measures pursuant to Article 88, as applicable, in order that consumers can monitor and control expenditure	Providers of an adequate broadband internet access service and of voice communications services referred to in Article 87 that provide services pursuant to Article 88 shall offer the following facilities and services to consumers benefiting from measures pursuant to Article 88, as applicable, in order that consumers can monitor and control expenditure:
Comments: We welcome the addition as it adds a qualifier of sufficient capacity for the universal service. We are would caution against removing the word "specific".	

Amendment 33: -

2026/0013(COD): Article 91 para 2 point e (-)	
(e) tariff advice;	tariff advice on a request basis;
Comments: Tariff advice should not be limited to an on request basis.	

Amendment 34: ~

2026/0013(COD): Article 92 para 3 subpara 1 (~)	
By 30 June 2034 the Commission, taking account of the BEREC opinion, shall review the scope of the affordable universal service of Article 88 and availability of universal service of Article 90, in particular with a view to proposing to the European Parliament and to the Council that the scope be changed or redefined.	By 30 June 2034 the Commission, taking account of the BEREC opinion, shall review the application of universal service obligations and submit a report to the European Parliament and to the Council regarding the outcome of the review.
Comments: -	

Amendment 35: -

2026/0013(COD): Article 92 para 3 subpara 2 (-)	
The review shall be undertaken in light of social, economic and technological developments, including transition to fibre and taking into account, inter alia, prevailing technologies used by the majority of consumers. The Commission shall submit a report to the European	deleted

Parliament and to the Council regarding the outcome of the review.	
Comments: Removing the specification for the review report removes clarity and risks losing sight of significant elements of evidence based policy making.	

Amendment 36: -!

2026/0013(COD): Article 93 para 1 point 1 (new) (-!)	
	(1) All providers of content, applications, and services that affect traffic management must not interfere with, degrade, restrict, or discriminate against open access to the internet.
Comments: This badly drafted amendment introduces extreme uncertainty which would be contrary to the goal of upholding net neutrality in this reform!	
Traffic management is a practice by a network operator in their network. The concept does not include Content and Application Providers (CAPs) and nothing they do with regards to how they distribute their traffic should have an impact on network management, since everything beyond the payload of layer 4 of the TCP/IP protocol should be irrelevant for the handling of traffic by ISPs.	
The net neutrality provisions have a clear scope on the management by ISPs of their own network. Users gain nothing, by mixing their duties to treat traffic equally with imagined impacts of CAPs in how traffic is treated. We highly recommend not adopting this amendment or any amendments on the core net neutrality provisions. This would also risk upending the current case law on net neutrality, which was very favorable to consumers in Europe.	

Amendment 37: -!

2026/0013(COD): Article 93 para 1a: (-!)	
	1a. The obligations set out in this Article do not apply to non-public networks or machine-to-machine connections that are not accessible to the public.
Comments: This amendment would create a third category of access service and leave it completely unregulated. Effectively, this means Europe would have three types of access services: 1) normal internet with net neutrality protections 2) specialised services based on Article 93(5), with safeguards to ensure existing online services can't buy preferential treatment and that capacity and availability of normal internet are not deteriorated by the provision of specialised services 3) a completely unregulated type of access service based on the loophole this amendment creates.	
This third category of access service could use up capacity allocated for the open internet. It could also become a fast lane for Big Tech companies with deep pockets to provision IoT devices with preferential treatment over everyone else. The conditions of non-public networks could easily be	

satisfied by vertically integrating with device manufacturers, like Amazon Kindle, Google Nest, Meta VR headsets or Apple devices.

There is a carefully crafted safeguards regime around specialised services based on Article 93(5). The CJEU and BEREC have a decade of case law that provides legal clarity to the telecom sector, device manufacturers, content providers and the public. This amendment would upend all of this and effectively allow net neutrality to be circumvented by the most powerful actors that already control our online experiences.

Subsequently, the European competitors of those companies would be at an insurmountable disadvantage and basically be barred from competing, if they are not also rolling out devices to millions of users to be able to use this loophole.

Amendment 38: -!

2026/0013(COD): Article 93 para 3 subpara 2 (-!)	
<p>The first subparagraph shall not prevent providers of internet access services from implementing reasonable traffic management measures. In order to be deemed to be reasonable, such measures shall be transparent, non-discriminatory and proportionate, and shall not be based on commercial considerations but on objectively different technical quality of service requirements of specific categories of traffic. Such measures shall not monitor the specific content and shall not be maintained for longer than necessary.</p>	<p>The first subparagraph shall not prevent providers of internet access services from differentiating among specific categories of traffic subject to different technical requirements as regards the level of quality of service, provided that all traffic within each specific category is treated equally and in a non-discriminatory manner, or from implementing reasonable traffic management measures. In order to be deemed to be reasonable, such measures shall be transparent, non-discriminatory and proportionate, and shall not be based on commercial considerations but on objectively different technical quality of service requirements of specific categories of traffic. Such measures shall not monitor the specific content and shall not be maintained for longer than necessary</p>
<p>Comments: Class-based network management is a loophole to net neutrality the telecom sector has asked for many decades. Lawmakers in Europe and all around the world have decided against it for good reasons. It simply is neither preferable nor practical compared to other forms of network management.</p> <p>For example, an architect or web developer will want to prioritise an upload for a client whereas a gamer would want to prioritise their online gaming or streams. Why should an ISP make that determination? User controlled quality of service systems already exist and allow the paying customer to decide whats important on their internet connection.</p> <p>Additionally, the categories this amendment envisions are purely hypothetical. A network provider</p>	

shouldn't look inside any data packet to begin with and not treat it differently based on its content. With proper encryption and anonymisation (like VPNs or Tor) this also becomes technically impossible for an ISP to determine the application within a transmission. All definitions of categories of traffic are probabilistic at best, since protocols are often multi-purpose. For example, a video live stream can be delivered by normal http requests and not necessarily based on dedicated protocols for live streaming. This makes it indistinguishable from web traffic.

Lastly, if we were to allow ISPs to treat traffic differently based on such undefined categorisations, we would also give them grounds to look into every data packet - inviting Deep Packet Inspection (DPI) and other privacy infringements.

Amendment 39: -!

2026/0013(COD): Article 93 para 5a (new) **(-!)**

5a. By [6 months after the date of entry into force of this Regulation], BEREC shall submit an opinion to the Commission on services other than internet access services which are optimised for specific content, applications or services, or a combination thereof.

Comments: BEREC is already conducting a review of its own net neutrality guidelines with a view to incorporating any new technological developments. This is already the second review of the guidelines in light of 5G mobile network technology. This provision serves nothing as it would mandate something that is already happening.

Amendment 40: -!

2026/0013(COD): Article 93 para 5b (new) **(-!)**

5b. By [12 months after the date of entry into force of this Regulation], BEREC shall, after consulting stakeholders and national regulatory authorities, and in close cooperation with the Commission, issue guidelines on services other than internet access services which are optimised for specific content, applications or services, or a combination thereof, and in accordance with the obligations related to open internet access.

Comments: See above Amendment 39.

Amendment 41: -!

2026/0013(COD): Article 93 para 6 subpara 1: (-!)	
The Commission may adopt implementing acts detailing the conditions referred to in this Article for the offering of services other than internet access services which are optimised for specific content, applications or services, or a combination thereof.	The Commission, taking account of the BEREC opinion as referred to in Article 93 (5a), shall adopt implementing acts detailing the conditions referred to in this Article for the offering of services other than internet access services which are optimised for specific content, applications or services, or a combination thereof.
Comments: NRAs are in charge of enforcing the net neutrality provisions and BEREC has a track record of providing impartial expert advice to ensure harmonised enforcement in the Union. Inserting the Commission in this role would only add legal uncertainty and dangerous red tape. This amendment would even go further with this idea and mandate of the Commission to issue such guidelines.	

Amendment 42: ++

2026/0013(COD): Article 93 para 3 (++)	
3. National regulatory authorities shall share with BEREC updates on their main practices and national findings concerning open internet access based on the information received pursuant to paragraph 2. Based on the information from the national regulatory authorities, BEREC shall, by 24 months after the date of entry into force of this Regulation and every two years thereafter publish a report regarding the main practices and findings concerning open internet access in the Union.	National regulatory authorities shall share with BEREC updates on their main practices and national findings concerning open internet access based on the information received pursuant to paragraph 2. Based on the information from the national regulatory authorities, BEREC shall, by 24 months after the date of entry into force of this Regulation and every year thereafter publish a report regarding the main practices and findings concerning open internet access in the Union.
Comments: We welcome the added transparency.	

Amendment 43: ~

2026/0013(COD): Article 95 para 1 subpara 1 point d (~)	
Before a consumer is bound by a contract or any corresponding offer, and in addition to requirements pursuant to Directive 2011/83/EU , providers of internet access services or of publicly available interpersonal communications services shall provide the information listed in Annex III of this Regulation to the extent that that information relates to a service	Before a consumer is bound by a contract or any corresponding offer, providers of internet access services or of publicly available interpersonal communications services shall provide the information listed in Annex III of this Regulation only to the extent that that information relates to a service they provide and is not already required pursuant to Directive

they provide.	2011/83/EU.
Comments: -	

Amendment 44: -

2026/0013(COD): Article 95 para 1 subpara 2 (-)	
The information shall be provided in a clear and comprehensible manner on a durable medium as defined in Article 2, point (10), of Directive 2011/83/EU or, where provision on a durable medium is not feasible, in an easily downloadable document made available by the provider. The provider shall expressly draw the consumer's attention to the availability of that document and the importance of downloading it for the purposes of documentation, future reference and unchanged reproduction.	The information shall be provided in a clear and comprehensible manner on a durable medium as defined in Article 2, point (10), of Directive 2011/83/EU or, where provision on a durable medium is not feasible, in an easily downloadable document made available by the provider.
Comments: This seems to remove transparency that can hurt the consumer. Particularly less digitally literate consumers would benefit from such information.	

Amendment 45: -

2026/0013(COD): Article 95 para 7 (-)	
7. Member States shall not maintain or introduce in their national law consumer protection provisions diverging from this Article, including more or less stringent provisions to ensure a different level of protection. This is without prejudice to the right of Member States to maintain provisions on additional facilities under Directive (EU) 2018/1972.	Member States shall not maintain or introduce in their national law consumer protection provisions diverging from this Article, including more or less stringent provisions to ensure a different level of protection.
Comments: This amendment hurts consumers by taking powers away from member states to establish higher consumer protection provisions.	

Amendment 46: ++

2026/0013(COD): Article 96 title (++)	
Transparency	Transparency and comparison of offers
Comments: We welcome the added transparency via comparison platforms.	

Amendment 47: ++

2026/0013(COD): Article 96 para 1a (new) (++)

	<p>1a. National competent authorities shall, in coordination with national regulatory authorities, ensure that end-users have access free of charge to at least one independent comparison tool which enables them to compare and evaluate different internet access services and publicly available number-based interpersonal communications services with regard to prices and tariffs of services provided against recurring or consumption-based direct monetary payments and the quality of service performance.</p> <p>The comparison tool referred to in this paragraph shall:</p> <p>(a) be operationally independent from the providers of such services;</p> <p>(b) clearly disclose the owners and operators of the comparison tool;</p> <p>(c) set out clear and objective criteria on which the comparison is to be based;</p> <p>(d) use plain and unambiguous language;</p> <p>(e) provide accurate and up-to-date information and state the time of the last update;</p> <p>(f) be open to any provider of internet access services or publicly available interpersonal communications services making available the relevant information, and include a broad range of offers covering a significant part of the market;</p> <p>(g) include the possibility to compare prices, tariffs and quality of service performance between offers available to consumers and, if required by Member States, between those offers and the standard offers publicly available to other end-users.</p>
<p>Comments: We welcome the added transparency via comparison platforms.</p>	

Amendment 48: ++

2026/0013(COD): Article 97 para 3 subpara 2 (++)	
Providers shall notify consumers at least	Providers shall notify consumers at least

one month in advance of any change in the contractual conditions and shall simultaneously inform them of their right to terminate the contract without incurring any further costs if they do not accept the new conditions. The right to terminate the contract shall be exercisable within one month after notification. The notification shall be made in a clear and comprehensible manner on a durable medium.	one month in advance of any change in the contractual conditions and shall simultaneously inform them of their right to terminate the contract without incurring any further costs if they do not accept the new conditions. The right to terminate the contract shall be exercisable within three months after notification. The notification shall be made in a clear and comprehensible manner on a durable medium.
Comments: We welcome the extra two months to terminate a contract upon contractual changes .	

Amendment 49: ~

2026/0013(COD): Article 97 para 5 subpara 1 (~)	
Where a consumer has the right to terminate a contract for a publicly available electronic communications service, other than a number-independent interpersonal communications service, before the end of the agreed contract period pursuant to this Regulation or to other provisions of Union law or national law, no compensation shall be due by the consumer other than for retained subsidised terminal equipment.	Where a consumer has the right to terminate a contract for a publicly available electronic communications service, other than a number-independent interpersonal communications service, before the end of the agreed contract period pursuant to this Regulation or to other provisions of Union law or national law, no compensation shall be due by the consumer other than for retained bundled terminal equipment.
Comments: -	

Amendment 50: ~

2026/0013(COD): Article 98 para 2a (new) (~)	
	2a. The right of the consumer to terminate the bundle contract shall not extend to elements that have been subscribed under a separate contract with a clearly defined commitment period, provided that the consumer has expressly agreed to that period and that the element remains valid independently of the bundle contract.
Comments:-	

Amendment 51: ~

2026/0013(COD): Article 99 para 1 (~)

<p>Article 95, Article 97(1), Article 98(1) and Article 98(3) shall also apply to end-users that are microenterprises or not-for-profit organisations, unless they have explicitly agreed to waive all or parts of rights laid down in those provisions. Article 97(2), Article 97(3) and Article 97(5) shall also apply to end-users that are microenterprises, small and medium-sized enterprises or not-for-profit organisations, unless they have explicitly agreed to waive all or parts of the rights laid down in those provisions.</p>	<p>Article 95, Article 97(1), Article 98(1) and Article 98(3) shall also apply to end-users that are microenterprises, small and medium-sized enterprises or not-for-profit organisations, unless they have explicitly agreed to waive all or parts of rights laid down in those provisions and provided that they subscribe to offers and contracts intended for consumers. Article 97(2), Article 97(3) and Article 97(5) shall also apply to end-users that are microenterprises, small and medium-sized enterprises or not-for-profit organisations, unless they have explicitly agreed to waive all or parts of the rights laid down in those provisions and provided that they subscribe to offers and contracts intended for consumers.</p>
<p>Comments: -</p>	

Amendment 52: ~

<p>2026/0013(COD): Article 100 para 1 subpara 1 (~)</p>	
<p>In the case of switching between providers of internet access services, the providers concerned shall provide the end-user with adequate information before and during the switching process and ensure continuity of the internet access service, unless technically not feasible. The receiving provider shall ensure that the activation of the internet access service occurs within the shortest possible time on the date and within the timeframe expressly agreed with the end-user. The transferring provider shall continue to provide its internet access service on the same terms until the receiving provider activates its internet access service. Loss of service during the switching process shall not exceed one working day.</p>	<p>In the case of switching between providers of internet access services, the providers concerned shall provide the end-user with adequate information before and during the switching process and ensure continuity of an adequate internet access service. The receiving provider shall ensure that the activation of the internet access service occurs within the shortest possible time on the date and within the timeframe expressly agreed with the end-user. The transferring provider shall continue to provide its internet access service on the same terms until the receiving provider activates its internet access service. Loss of service during the switching process shall not exceed one working day.</p>
<p>Comments: -</p>	

Amendment 53: ~

<p>2026/0013(COD): Article 100 para 3 (~)</p>

3. Where an end-user terminates a contract the end-user shall have the right to port a number from the national numbering plan to the same or another provider for a minimum of one month after the date of termination, unless that right is renounced by the end-user.	In case an end-user terminates a contract the end-user shall have the right to port a number from the national numbering plan to the same or another provider for a minimum of one month after the date of termination, unless that right is renounced by the end-user.
Comments: -	

Amendment 54: ~

2026/0013(COD): Article 100 para 6 subpara 2 (~)	
By [12 months after the date of entry into force of this Regulation], BEREC shall, after consulting stakeholders and in close cooperation with the Commission, adopt guidelines specifying the details of the switching and porting processes, taking into account technical feasibility and the need to maintain continuity of service to the end-users. The guidelines shall also detail the compensation process of end-users by their providers in the case of delays in, or abuse of, porting and switching processes, missed service and installation appointments or failure by the provider to comply with the obligations set out in this Article. National regulatory authorities shall establish the details of the switching and porting processes taking account of the BEREC guidelines. This shall include, where technically feasible, a requirement for the porting to be completed through over-the-air provisioning, unless an end-user requests otherwise.	By [12 months after the date of entry into force of this Regulation], BEREC shall, after consulting stakeholders and national regulatory authorities and in close cooperation with the Commission, adopt guidelines specifying the details of the switching and porting processes, taking into account technical feasibility and the need to maintain continuity of service to the end-users. The guidelines shall also detail the compensation process of end-users by their providers in the case of delays in, or abuse of, porting and switching processes, missed service and installation appointments or failure by the provider to comply with the obligations set out in this Article, and may include, where technically feasible, a requirement for the porting to be completed through over-the-air provisioning, unless an end-user requests otherwise.
Comments: -	

Amendment 55: ++

2026/0013(COD): Article 100 para 6 subpara 4 (++)	
Transferring providers shall refund, upon request , any remaining credit to the consumers using pre-paid services. Refund may be subject to a fee only if provided for in the contract. Any such fee shall be	Transferring providers shall refund any remaining credit to the consumers using pre-paid services. Refund may be subject to a fee only if provided for in the contract. Any such fee shall be proportionate and

proportionate and commensurate with the actual costs incurred by the transferring provider in offering the refund.	commensurate with the actual costs incurred by the transferring provider in offering the refund.
Comments: We welcome the benefit to the consumer that unused funds are refunded automatically.	

Amendment 56: ++

2026/0013(COD): Article 106 para 1 subpara 1 (++)	
Providers of publicly available number-based interpersonal communications services shall provide end-users access to emergency services through emergency communication, mandated by the Member State. Those emergency communication shall be provided free of charge and without having to use any means of payment, including by using the single European emergency number '112' and any national emergency number specified by Member States.	Providers of publicly available number-based interpersonal communications services shall provide end-users access to emergency services through emergency communication, mandated by the Member State. Those emergency communication shall be provided free of charge and without having to use any means of payment, including by using the single European emergency number '112' and any national emergency number specified by Member States. The single European emergency number '112' shall be based on best practices from national emergency numbers and be usable for any type of emergency, including cases of cyberbullying or digital violence.
Comments: We welcome the inclusion of digital violence and cyberbullying in the scope of the European emergency number.	

Amendment 57: -!

2026/0013(COD): Article 115 para 1 point f	
(f) offering the voluntary conciliation on ecosystem cooperation;	carrying out the mandatory conciliation on ecosystem cooperation, including taking binding measures where necessary;
Comments: See amendment 4 and 66.	

Amendment 58: -!

2026/0013(COD): Article 124 para 1 point j (-!)	
(j) the elements of the case submitted for a voluntary conciliation procedure, in accordance with Article 192(2).	the elements of the case submitted for a mandatory conciliation procedure, in accordance with Article 192(2).
Comments: See amendment 4 and 66.	

Amendment 59: -

2026/0013(COD): Article 125 para 1a (new) (-)	
	(r) services other than internet access services which are optimised for specific content, applications or services, or a combination thereof, in accordance with Article 93 (5);
Comments: See amendment 39.	

Amendment 60: ++

2026/0013(COD): Article 125 para 1b (new) (++)	
	(s) the accessibility and transparency of tariff options or packages for consumers with low income or special social needs, in accordance with Article 88 (3)
Comments: We welcome the added clarity via BEREC on how to best communicate offers for low income households.	

Amendment 61: -!

2026/0013(COD): Article 126 para 1 point d (-!)	
(d) the effects of the application of the guidelines on effective ecosystem cooperation, and on the functioning of the facility for voluntary conciliation, in accordance with Article 193(1);	the effects of the application of the guidelines on effective ecosystem cooperation, and on the functioning of the facility for mandatory conciliation, in accordance with Article 193(1);
Comments: See amendment 4 and 66.	

Amendment 62: ++

2026/0013(COD): Article 188 para 3 (++)	
3. Providers of internet access services shall put in place transparent, simple and efficient procedures to address complaints of end-users relating to the rights and obligations laid down in Article 93 and complaints of consumers, microenterprises and not-for-profit organisations relating to the rights laid down in Section 5 of Annex III.	Providers of internet access services shall put in place user friendly, easily accessible , transparent, simple and efficient procedures to address complaints of end-users relating to the rights and obligations laid down in Article 93 and complaints of consumers, microenterprises and not-for-profit organisations relating to the rights laid down in Section 5 of Annex III
Comments: We welcome the transparency for the consumer.	

Amendment 63: ++

2026/0013(COD): Article 190 para 4 (++)	
4.The national regulatory authority or authorities concerned shall await BEREC's opinion before taking any action to resolve the dispute. In exceptional circumstances, where there is an urgent need to act, in order to safeguard competition or protect the interests of end-users, any of the competent national regulatory authorities may , either at the request of the parties or on its own initiative, adopt interim measures.	The national regulatory authority or authorities concerned shall await BEREC's opinion before taking any action to resolve the dispute. In circumstances where there is an urgent need to act, in order to safeguard competition or protect the interests of end-users, any of the competent national regulatory authorities shall , either at the request of the parties or on its own initiative, adopt interim measures.
Comments: We welcome the focus on competition.	

Amendment 64: -!

2026/0013(COD): Article 191 (-!)	
Guidance to facilitate ecosystem cooperation	Guidance to facilitate effective ecosystem cooperation
Comments: See amendment 4 and 66.	

Amendment 65: -!

2026/0013(COD): Article 192 (-!)	
Facility for voluntary conciliation	Facility for mandatory conciliation
Comments: see amendment 4 and 66.	

Amendment 66: -!

2026/0013(COD): Article 192 para 1 (-!)	
1. On request of providers of electronic communications networks or other undertakings active in the electronic communications or closely related sectors, national regulatory authorities shall offer a conciliatory meeting between two providers of electronic communications networks or between such a provider and another undertaking active in the electronic communications or closely related sectors on technical and commercial arrangements which are subject to the guidelines referred to in Article 191(1) . The conciliatory meeting shall be convened by	On request of providers of electronic communications networks or other undertakings active in the electronic communications or closely related sectors, national regulatory authorities shall offer a mandatory conciliatory meeting between two providers of electronic communications networks or between such a provider and another undertaking active in the electronic communications or closely related sectors on technical and commercial arrangements. The conciliatory meeting shall be convened by the national regulatory authority of the party lodging

the national regulatory authority of the party lodging the request for conciliation unless agreed otherwise by the parties.	the request for conciliation unless agreed otherwise by the parties. The parties shall cooperate in good faith with the national regulatory authority specified in this paragraph.
<p>Comments: See amendment 4. Changing the nature of this mechanism to a mandatory framework is extremely problematic. The extortion by telecom companies from every CAP who wants to reach their customers runs contrary to how the internet has worked since the beginning. Customers are already paying to access all online content and making the quality of their connection dependent on the payments of the content provider, would infringe their net neutrality rights.</p> <p>Such payment obligations will hurt particularly SMEs in Europe that will not be able to afford these fees. We already see in Germany – where such a model already exists in the network of Deutsche Telekom³ – that it is European SMEs that have to pay the former incumbent.⁴ This hurts the challengers in their ability to compete with the Hyperscalers.</p> <p>In a mandate which is focused on cutting red tape and increasing competitiveness, it is ludicrous to start regulating a market with a mandatory mechanism, although everyone⁵ – including the regulators⁶ – are saying no regulation is needed.</p>	

Amendment 67: -!

2026/0013(COD): Article 192 para 2 (-!)	
2. Within 1 week following the request for voluntary conciliation, the national regulatory authority shall inform BEREC of the elements of the case. Within two months following the request, BEREC shall issue an opinion on the elements of the case and options for effective cooperation in accordance with the guidelines referred to in Article 191.	Within 1 week following the request for mandatory conciliation, the national regulatory authority shall inform BEREC of the elements of the case.
<p>Comments: <i>see amendment 4 concerning the mandatory conciliation</i></p> <p>BEREC's involvement provides an important safeguard by promoting a consistent and harmonised application of the conciliation mechanism across the Union. Its independent assessment helps reduce the risk of divergent national approaches and contributes to legal certainty for all parties involved. Combined with the introduction of mandatory conciliation, the removal of BEREC's opinion further concentrates discretion at the national level while weakening EU-level oversight and consistency. If the conciliation mechanism is to be retained, BEREC should continue to play a substantive role by providing an opinion on individual cases.</p>	

3 <https://netzbremse.de/en/>

4 <https://www.cispe.cloud/cispe-comment-regarding-the-recent-consumer-complaint-against-deutsche-telekom-in-germany/>, <https://www.tagesschau.de/wirtschaft/digitales/telekom-drosselung-100.html> and <https://www.heise.de/news/Peering-Verbraucherschuetzer-machen-gegen-Netzbremse-der-Telekom-mobil-10245334.html>

5 <https://epicenter.works/en/content/joint-industry-ngo-consumer-telecom-meps-and-rightsholder-statement-against-network-fees>

6 <https://www.berec.europa.eu/en/all-documents/berec/reports/berec-report-on-the-ip-interconnection-ecosystem>

Amendment 68: -!

2026/0013(COD): Article 192 para 3 – introductory part (-!)	
3. In cooperation with BEREC, the national regulatory authority specified in paragraph 1 of this Article shall convene the meeting of the parties no later than three months after the submission of the request for the facility for voluntary conciliation. No later than one month after the meeting, taking account of the BEREC opinion, the national regulatory authority shall provide a written account of the meeting, including the following information:	In cooperation with BEREC, the national regulatory authority specified in paragraph 1 of this Article shall convene the mandatory conciliatory meeting of the parties no later than one month after the submission of the request for the facility for mandatory conciliation. Both parties shall be present or represented at the conciliatory meeting. No later than one month after the meeting, and taking account of any related opinion from BEREC , the national regulatory authority shall provide a written account of the meeting and of any decisions made , including the following information:
Comments: See Amendment 4 and 66.	

Amendment 69: -!

2026/0013(COD): Article 192 para 3 point b (-!)	
(b) possible next steps;	deleted
Comments: See Amendment 4 and 66.	

Amendment 70: -!

2026/0013(COD): Article 192 para 3 point c (-!)	
(c) elements of agreement, where applicable and if both parties were present in the meeting;	elements of agreement, where applicable;
Comments: See Amendment 4 and 66.	

Amendment 71: -!

2026/0013(COD): Article 192 para 3 point d (-!)	
(d) options proposed by the national regulatory authority for effective cooperation, if both parties were present in the meeting and no agreement was reached	options proposed by the national regulatory authority for effective cooperation, if no agreement was reached.
Comments: See Amendment 4 and 66.	

Amendment 72: -!

2026/0013(COD): Article 192 para 3a (new) (-!)	
	3a. Provided the proposed options have not been implemented and no agreement is reached within a reasonable time limit following the conciliatory meeting, the national regulatory authority specified in paragraph 1 shall have the power to impose binding measures to resolve the dispute between the parties. The national regulatory authority shall inform BEREC on adopted measures without undue delay.
Comments: See Amendment 4 and 66.	

Amendment 73: -!

2026/0013(COD): Article 193 para 1 (-!)	
By [24 months after the date of application of this Regulation and every two years thereafter], BEREC shall publish a report on the effects of the application of the guidelines referred to in Article 191(1) on effective ecosystem cooperation as well as on the functioning of the facility for voluntary conciliation referred to in Article 192.	By [12 months after the date of application of this Regulation and every two years thereafter], BEREC shall publish a report on the effects of the application of the guidelines referred to in Article 191(1) on effective ecosystem cooperation as well as on the functioning of the facility for mandatory conciliation referred to in Article 192 and shall transmit it to the European Parliament.
Comments: -	

Amendment 74: -!

2026/0013(COD): Article 193 para 2 (-!)	
(d) compliance, as applicable to the By [36 months after the date of application of this Regulation], taking account of BEREC report referred to in paragraph 1, the Commission shall review the functioning of the ecosystem cooperation.	By [24 months after the date of application of this Regulation], in accordance with the conclusions of BEREC report referred to in paragraph 1, the Commission may review the functioning of the ecosystem cooperation. The European Parliament shall be informed and involved in the review process of the ecosystem cooperation and the facility for mandatory conciliation.
Comments: -	

Amendment 75: ~

2026/0013(COD): Article 196 para 3 (~)	
3. Where a competent authority finds that an undertaking does not comply with one or more of the conditions of the general authorisation or obligations and conditions for rights of use for radio spectrum, for numbering resources or with the specific obligations referred to in Part V, it shall notify the undertaking of those findings and give the undertaking the opportunity to state its views, within a reasonable time limit.	Where a national regulatory authority or other competent authority finds that an undertaking does not comply with one or more of the conditions of the general authorisation or obligations and conditions for rights of use for radio spectrum, for numbering resources or with the specific obligations referred to in Part V, it shall notify the undertaking of those findings and give the undertaking the opportunity to state its views, within a reasonable time limit.
Comments: -	

Amendment 76: ~

2026/0013(COD): Article 196 para 4 subpara 1 (~)	
The competent authority shall have the power to require the cessation of the breach referred to in paragraph 3 either immediately or within a reasonable time limit and shall take appropriate and proportionate measures aimed at ensuring compliance.	The national regulatory authority or other competent authority shall have the power to require the cessation of the breach referred to in paragraph 3 immediately and shall take appropriate and proportionate measures aimed at ensuring compliance in accordance with Article 11 (4) .
Comments: -	

Amendment 77: ~

2026/0013(COD): Article 196 para 4 subpara 2 point a (~)	
(a) where appropriate , dissuasive financial penalties which may include periodic penalties with retroactive effect	dissuasive financial penalties which may include periodic penalties with retroactive effect;
Comments: -	

Amendment 78: ~

2026/0013(COD): Article 196 para 6 (~)	
6. Notwithstanding paragraphs 3 and 4 of this Article, Member States shall empower the competent authority to impose, where appropriate, financial penalties on undertakings for failure to provide information, in accordance with	Notwithstanding paragraphs 3 and 4 of this Article, Member States shall empower the national regulatory authority or other competent authority to impose, where appropriate, financial penalties on undertakings for failure to provide

the obligations imposed under Article 181(3), first subparagraph, points (a) or (b), and obligations of transparency, within a reasonable period set by the competent authority.	information, in accordance with the obligations imposed under Article 181(3), first subparagraph, points (a) or (b), and obligations of transparency, within a reasonable period set by the national regulatory authority or other competent authority.
Comments: -	

Amendment 79: ~

2026/0013(COD): Article 196 para 9 (~)	
9. In the case of a serious breach or repeated breaches of the conditions of the general authorisation, or of the obligations and conditions for the rights of use for radio spectrum and for numbering resources or of the specific obligations referred to in Part V, where measures aimed at ensuring compliance as referred to in paragraphs 3 and 4 of this Article have failed, Member States shall empower competent authorities to prevent an undertaking from continuing to provide electronic communications networks or services or suspend or withdraw those rights of use. Such penalties may be applied to cover the period of any breach, even if the breach has subsequently been rectified.	In the case of a serious breach or repeated breaches of the conditions of the general authorisation, or of the obligations and conditions for the rights of use for radio spectrum and for numbering resources or of the specific obligations referred to in Part V, where measures aimed at ensuring compliance as referred to in paragraphs 3 and 4 of this Article have failed, Member States shall empower national regulatory authorities or other competent authorities to prevent an undertaking from continuing to provide electronic communications networks or services or suspend or withdraw those rights of use in accordance with Article 11 (4) . Such penalties may be applied to cover the period of any breach, even if the breach has subsequently been rectified.
Comments: -	

Amendment 80: ~

2026/0013(COD): Article 196 para 11 (~)	
11. Notwithstanding paragraphs 3, 4 and 9 of this Article, and without prejudice to Article 39 on a Union authorisation for the use of satellite radio spectrum, the competent authority may take urgent interim measures to remedy the situation in advance of reaching a final decision, where it has evidence of a breach of the conditions of the general authorisation, of the obligations and conditions for the rights	Notwithstanding paragraphs 3, 4 and 9 of this Article, and without prejudice to Article 39 on a Union authorisation for the use of satellite radio spectrum, the national regulatory authority or other competent authority may take urgent interim measures to remedy the situation in advance of reaching a final decision, where it has evidence of a breach of the conditions of the general authorisation, of the obligations

<p>of use for radio spectrum and for numbering resources, or of the specific obligations referred to in Part V which represents an immediate and serious threat to public safety, public security or public health or risks creating serious economic or operational problems for other providers or users of electronic communications networks or services or other users of the radio spectrum. The competent authority shall give the undertaking concerned the opportunity to state its views and propose any remedies. Where appropriate, the competent authority may confirm the interim measures, which shall be valid for a maximum of three months, but which may, in circumstances where enforcement procedures have not been completed, be extended for a further period of up to three months.</p>	<p>and conditions for the rights of use for radio spectrum and for numbering resources, or of the specific obligations referred to in Part V which represents an immediate and serious threat to public safety, public security or public health or risks creating serious economic or operational problems for other providers or users of electronic communications networks or services or other users of the radio spectrum. The competent authority shall give the undertaking concerned the opportunity to state its views and propose any remedies. Where appropriate, the national regulatory authority or other competent authority shall confirm the interim measures, which shall be valid for a maximum of three months, but which may, in circumstances where enforcement procedures have not been completed, be extended until a final decision is reached.</p>
<p>Comments: -</p>	