



ecta RESPONSE

**TO THE PUBLIC CONSULTATION BY THE
EUROPEAN COMMISSION**

ON THE

EUROPE'S DIGITAL DECADE:

2030 DIGITAL TARGETS - ROADMAP

09 MARCH 2021

1. **ecta**, the **European competitive telecommunications association**,¹ welcomes the opportunity to comment on the European Commission's Roadmap Communication on Europe's digital decade: 2030 digital targets.
2. **ecta** represents those alternative operators who, relying on the pro-competitive EU legal framework that has created a free market for electronic communications, have helped overcome national monopolies to give EU citizens, businesses and public administrations quality and choice at affordable prices. **ecta** represents at large those operators who are driving the development of an accessible Gigabit society, who represent significant investments in VHC networks and who demonstrate unique innovation capabilities.
3. **ecta** agrees with the European Commission that Europe's future is determined by the successful achievement of the twin digital and green transitions. **ecta** further shares the view that digital technologies are critical to recover from the COVID-19 crisis. No-one can be left behind, and digital technologies are essential to achieve the EU's overarching sustainability goals.
4. Since the beginning of the pandemic crisis, **ecta** members are 'all hands on deck' taking care of the networks and their users. Competitive telecommunications operators hugely contribute to network resilience and redundancy to assure service continuity not only for citizens and enterprises - large and small - but also ensuring resilient connectivity to the data centres and for those on the front line, the health actors.
5. The COVID-19 crisis has further underscored that high-quality (bidirectional) connectivity to homes, business premises, the public sector, antenna sites (including small cells), etc. is more essential than ever. It has also shown that quality (including uptime and repair times) of connections is increasingly of crucial importance, including for home schooling and home working, digitized businesses and organizations, etc. The increased need for connectivity for home schooling and working, and increased digitization of the economy and the public sector, will continue during and after the economic recovery.
6. **ecta** and its members were not mistaken when embarking on their new strategic vision last year²: *"In a competitive European digital sector, every citizen is included and operators are drivers for innovation that guarantee Europe's competitiveness and digital sovereignty. By promoting a pro-competitive European regulatory framework, **ecta** wants to be the driving force behind it by capitalising on its expertise and the active collaboration and engagement with its members"*

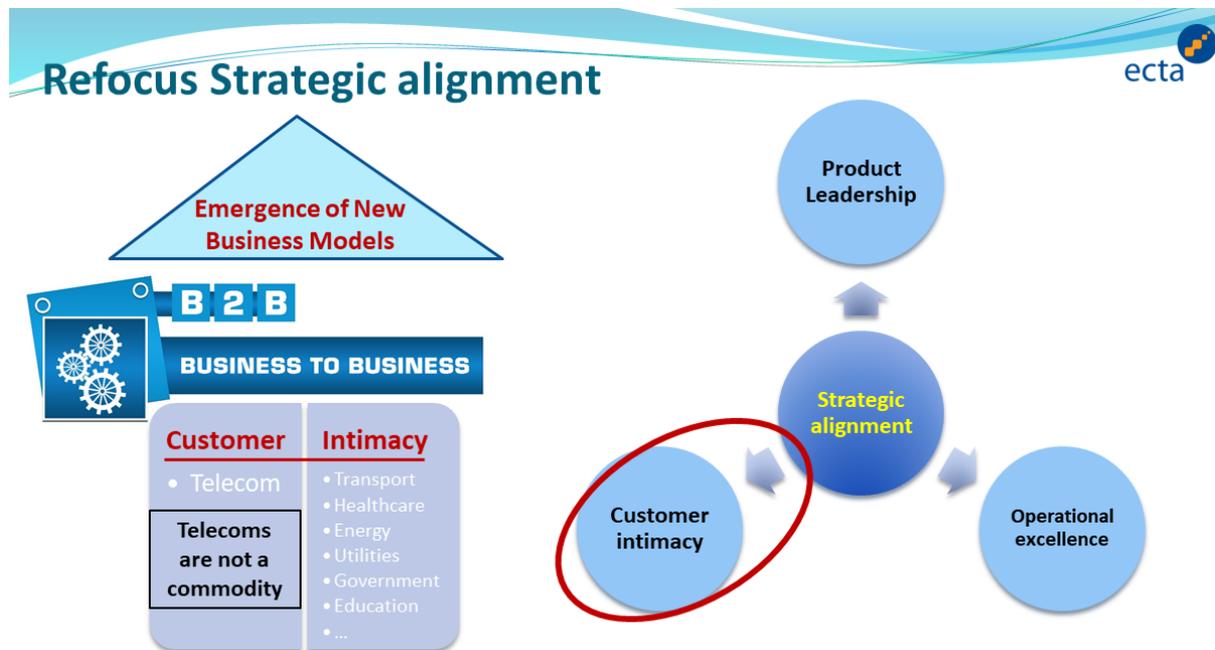
¹ <https://www.ectaportal.com/about-ecta>

² <https://www.ectaportal.com/news/ecta-press-releases/1201-ecta-appoints-new-board-directors-and-embarks-on-new-strategic-vision>

7. **ecta** shares the views that a successful digital transformation needs to be based on a clear vision. It must be ambitious, inspiring, and engaging to encourage the commitment of all European driving forces. The vision must also provide a clear signal to the rest of the world.
8. **ecta** and its members agree with the European Commission that EU citizens and businesses must be empowered to access and use the technology and data they need to ensure that the benefits of the digital transition materialize across all sectors and regions in Europe, including remote and rural areas. Therefore, we must reaffirm the importance of competition to promote a vibrant Gigabit society. Indeed, competitive digital markets, offering a large variety of products and services, are not only the most efficient way to empower citizens and businesses, but are also the market driver, and small and medium-sized operators/digital service providers are the backbone of the economy. They are the pioneers and pillars of good practices in the digital industry.
9. As **ecta** and its members are fully committed to providing citizens with a high quality and continuity of telecommunications services in the Covid-19 crisis and beyond, we are fully engaged in developing those services to assist our customers in the post-crisis economic recovery.
10. **ecta** and its members agree that Europe should demonstrate greater leadership in digital with a common plan towards 2030, based on clear goals and clear principles such as a high connectivity level and the respect of the right to privacy and freedom of speech. To this end, we welcome the comprehensive Digital Compass. **ecta** agrees that the Digital Compass should establish a monitoring system for European strategic digital capacities and capabilities, and outline the means and key milestones to achieve EU's ambition. Business managers have largely appropriated the terms used by Robert Kaplan and David Norton to introduce "The Balanced Scorecard - Measures that Drive Performance" in their landmark 1992 article in the Harvard Business Review³: "*What you measure is what you get*".
11. For years, **ecta** has been advocating for the definition and implementation of relevant and effective KPIs for the telecom/digital markets. The EU telecom policy focus of the last two decades has been on consumers and, unfortunately, Business to Business telecom markets remain highly concentrated.
12. This requires a change in approach from a focus on the consumer mass market to ensuring competitive connectivity provision, and leveraging connectivity and digital markets to enable business users across all industries and sectors, from start-ups to established conglomerates.
13. Looking forward, with the Fourth Industrial Revolution, it is essential for all the sectors of the economy to smoothly achieve their competitive digital transformation. This has never

³ <https://hbr.org/1992/01/the-balanced-scorecard-measures-that-drive-performance-2>

been as important as today. This means that the strategic alignment of operators in the Business to Business markets has to move to closer intimacy with their customers and new business models have to emerge. Telecom and digital resources are the driver for this.



14. To unleash the innovation potential of all the other sectors of the economy, it is essential that they can rely on a diversified offer of products and services proposed by diversified players, small and large. This is essential for new business models to emerge and to overcome the barrier of the cannibalisation of existing business models. Indeed, **ecta** stresses that competition not only has provided lower prices, improved quality and efficiency, but it has also been the fundamental driver of innovation – the driver that forces market players to continue to improve. And don't we all want to see our children pulled upwards in the classroom?
15. **ecta** and its members welcome the purpose of the communication and agree with Europe's digital ambition to focus on people's needs and expectations, and ensuring that the digital transformation has humans at its centre and is based on a renewed understanding of European digital citizenship. To this end **ecta** reiterates the need for a European single sign on.
16. **ecta** and its members further welcome the ambition to foster the digital transformation of European business and public administration. Therefore, we call on the European Commission to also clearly focus on the needs of all businesses, public administrations and public institutions (including their need for telecom resources) to assure their digitalization. **ecta** further reiterates the importance of promoting a diversified offer of

product and services proposed by diversified players to unleash the innovation potential of all the other sectors of the economy (see above).

17. The digital revolution is transforming the economic activity as a whole and therefore influences its carbon footprint. The digital industry has become fully aware of environmental issues and **ecta** members have not only made strong commitments to reduce their own carbon footprint, taking into account the continuous increase in the volumes of data consumed, but are also engaged and committed to developing those products and services to support other industries to reduce their carbon footprint. Therefore, **ecta** recommends the European Commission to provide a much more predominant place in the communication and the announced Digital Compass not only to the green transition but also to the potential synergies between the green and digital transitions and the opportunities of digitalization for environmental protection, climate action and nature conservation.
18. **ecta** counts among its members many entrepreneurs that took the risk to invest their own money and start their business from scratch relying on the promises of the European Regulatory Framework at the time of liberalisation of the Telecom Markets. Based on this experience, **ecta** recommends completing the communication with a special focus on European Entrepreneurship and put in place specific monitoring and KPIs.
19. **ecta** further calls on the European Commission to legislate to solve the problem of the accountability gap of National Regulatory Authorities within the European regulatory Framework. For example, the unwillingness of some National Regulatory Authorities to (timely)intervene where markets are dysfunctional has hindered the development of innovative pan European services in the field of connected cars.
20. **ecta** welcomes the ambition of the European Commission to widely consult citizens and stakeholders in a variety of ways. Indeed, transparency and stakeholder consultation are not only a pillar of European democracy but are also essential to ensure people's trust and buy-in to the European project. To this end, we call on the European Commission to improve its practices, given that, for several recent files (e.g. the Recommendation on Relevant Markets Susceptible to Ex-Ante Regulation in electronic communications), the European Commission failed to properly consult, and no consultations on draft texts were organised. This does not constitute, in **ecta's** view, good practice and is not in line with the objectives of better regulation.
21. Representing competitive leaders in closing the digital infrastructure divide in Europe, **ecta**, with its members, looks forward to providing its input to the relevant consultations, public and targeted, to be launched during the first semester of 2021. **ecta** will be equally pleased to provide bespoke participation to the Commission's upcoming events in this context.