Alliance for AI, IoT and Edge Continuum Innovation

Brussels, 9 July 2025

AIOTI Feedback on the upcoming Digital Networks Act

Comments on Simplification objective:

Investment needs:

While we acknowledge the fragmentation of the European telecoms sector, it is our view that a consolidation of the European telecoms sector could stimulate massive investment in digital infrastructure across the European Union (EU) provided, however, that European consumers' welfare is duly protected as a result of further market consolidation. We invite European policymakers to strike the right balance between the need for market consolidation and the need to ensure that European consumers do not have to bear most of the burden of such changes.

In addition, we would like to propose to replace WiFi6 with "the latest available and future Wi-Fi technology", since on the one hand it is WiFi7 is being currently deployed and on the other hand the document should provide more future looking statements.

Challenge of trusted suppliers

Cybersecurity is becoming now more important than ever. Indeed, Member States do face challenges for greater harmonization of cybersecurity requirements across the European Union; on this note we would like to emphasize the need for EU wide standardization, homologation and security schemes based on technical criteria and certification reflecting international state of the art security standards. The EU must enable continued trust in the related technologies and applications. Trust needs to be based on facts, facts must be verifiable, and verification must be based on international, globally-recognized and common standards. Any measures to be effective, should address genuine, present and sufficiently serious threat to security.

Restricting or excluding technology suppliers and vendors without facts-based verification would also raise an instance of legal incompatibility with national, EU and WTO law.

Security standards for end-to-end connectivity

We agree that one of the key challenge for the EU to lead the security standards for end-to-end connectivity is to ensure that such developments result in common and interoperable security standards for all key infrastructural elements underpinning sensitive communications infrastructures.

We propose that this challenge can be addressed by strengthening the EU engagement and cooperation with international standard organizations and associations. Moreover, also strengthening the EU participation in international common standards is to be fostered.

Comments on Spectrum objective:

Radio spectrum

We do acknowledge that Spectrum is a sovereign matter for each member state, that each country needs to plan and manage spectrum based on its digital economy development. Indeed, Spectrum auction mechanism is closely related to the market situation and economic structure of a country and is not suitable for unified management at the EU level.

The daily management of spectrum involves a large amount of coordination with neighbouring countries, including both EU countries and non-EU countries. Member States have accumulated a lot of coordination experience in the past decades. The regulatory bodies of each country are the most effective institutions to ensure the interests of each country. Globally, spectrum is regarded as a national affair.

Within these pillars, there is however a room for Spectrum allocation rules to possibly strengthen the capacity of the mobile operators to offer pan-European services, while complying with Member States' legal competence regarding spectrum allocation in accordance with EU Treaties.

We invite EU policymakers to consider harmonised timelines for spectrum auctions in order to provide for both investment and legal certainty. We recommend the adoption of auction processes which avoid artificial spectrum scarcity and unnecessarily high spectrum fees, and further to use the proceeds of auctions to incentivise mobile operators to invest in national communication network infrastructures.

It is our understanding that the commercial viability of direct-to-device (D2D) satellite connectivity has not yet been fully proven. Hence the capability of D2D satellite communications in effectively complementing European mobile communication networks is as yet uncertain. In this regard, it is recommended to follow-up the results of studies by 3GPP and towards WRC-27 on D2D satellite connectivity and spectrum.

As regards the topic of spectrum sharing, we recommend that co-channel spectrum sharing should be considered on a case-by-case basis and subject to cost-benefit analysis. Spectrum sharing should only be adopted if the net economic efficiency of multiple systems operating co-channel is greater than the economic efficiency of each system operating in the band on a standalone basis. This might be the case, for example, where the said systems are subject to adequate geographic separation or radio isolation, thereby avoiding mutual harmful inter-system interference.

Comments on Level Playing Field objective:

Universal service and affordability of digital infrastructure

In this context we agree that the preservation of Open Internet principles is very important in the context of deploying adequate broadband internet services, of the quality that is needed to perform basic tasks on-line, such as eGovernment services, social media, browsing or performing video calls, should be available throughout the EU, to various groups of end users, including end users that are located in certain areas such as rural/remote areas) or to end users that cannot afford the price of some services.

In this context, a key enabler can be the transition to IPv6. IPv6 would enable different groups of end users to have an address on the public internet, being able to publish on the World Wide Web its own content as well as to access the IoT devices in its own premise, with no dependence from Social Medial or other proprietary centralized platform. Moreover, IPv6 enable full market competition for new operators and service providers, where at present they are not able to get any more IPv4 public addresses.

New public infrastructure or infrastructure where public founding is used, are proposed to be fully compatible with IPv6, without mandating the IPv4 compatibility.

Comments on Access Regulation objective:

Authorisation

We agree that the principle single set of rules based for instance on a 'country of origin' principle for core networks and core network services can bring advantages, but they can as well bring challenges to small and medium-sized core network providers, related to the protection of their existing investment, and as well to challenges brought by possible evolution of their existing deployed sites. Therefore, a careful balance between investment needs, availability and affordability of services for end users and protection of investment and investment attractiveness of Europe should be taken into consideration.

Addressing barriers to core network centralisation

In this context, we would like to emphasize that core network centralization will have impact on following challenges:

- Cross-country network resilience:
    - Fault-rate of cross-country transmission is possibly higher than the fault-rate within national transmission;
    - Fault recovery and/or reliability challenge is more complex to be realized
- Cross–country Operation & Maintenance: O&M cross-country activities are more complex, which might require an increase in OPEX for core network providers.

Copper switch-off

We welcome the EC's intention to consider the deployment of fibre networks as a key process to facilitate the transition towards the new connectivity ecosystem and contributes to the EU's green objectives.

Some of the possible steps that could be taken in this area, are: (1) promoting innovative solutions, (2) focus on legislation to simplify the processes to facilitate fiber deployment in buildings and indoors and (3) support EC funded research, e.g., in the context of Photonics cPPP/Photonics21, focusing on the next generation of optical communication technologies.

Comments on Governance objective:

In this context we would like to emphasize that from a Governance perspective, a careful balance between investment needs, availability and affordability of services for end users and protection of investment and investment attractiveness of Europe should be taken into consideration.

About AIOTI

AIOTI is the multi-stakeholder platform for stimulating AI, IoT and Edge Continuum Innovation in Europe, bringing together small and large companies, academia, researchers, policy makers, end-users and representatives of society in an end-to-end approach. We strive to leverage, share and promote best practices in the AI, IoT and Edge Continuum ecosystems, be a one-stop point of information to our members while proactively addressing key issues and roadblocks for economic growth, acceptance and adoption of the AI, IoT and Edge Continuum Innovation in society. AIOTI contributions go beyond technology and address horizontal elements across application domains, such as matchmaking and stimulating cooperation by creating joint research roadmaps, defining policies and driving the convergence of standards and interoperability.