

4 July 2017

To

**Body of European Regulators  
for Electronic Communications**

via email:

[BEREC-Strategy-Consultation@berec.europa.eu](mailto:BEREC-Strategy-Consultation@berec.europa.eu)

***AT&T comments re: BEREC draft Strategy 2018-2020*** / Document number: BoR (17) 133

We welcome the opportunity to share our comments with BEREC regarding its Strategy 2018-2020

#### Introduction

1. The affiliates of AT&T Inc. that provide communications services to, from and within European Union Member States (collectively, “AT&T”) respectfully submit these comments on draft document, *BEREC Strategy 2018-2020* (BoR (17) 109), issued for public consultation on 7 June 2017. Within the EU, AT&T is a competitive provider of business connectivity and managed network services to some of the world’s largest multinational corporations, and has affiliate companies operating under the general authorisation regimes of 27 EU Member States.

AT&T supports the strategy document’s three ‘Strategic Objectives’, as well as the five ‘Strategic Priorities’, and we welcome the commitment to promote both competition and investment. We have a specific suggestion on streamlining regulatory reporting requirements which is described further below and which we believe would advance BEREC’s strategic objective of “Promoting the internal market”.

#### Market and Technological Developments

2. AT&T believes that BEREC has correctly identified many of the market and technological developments that will be shaping our industry in the years to the end of this decade. In this context, we welcome BEREC’s recognition of the significance of technologies such as 5G, IoT, Network Function Virtualisation (NFV) and Software Defined Networking (SDN). These developments underline the need to continually review and adapt regulatory models to the evolving digital ecosystem.

---

### Promoting the Internal Market

3. With particular regard to BEREC's strategic objective of "Promoting the Internal Market", here we would encourage BEREC to revisit the scope for streamlining and harmonising the regulatory burden that is placed on cross-border service providers within the EU by the multiple financial, statistical and market analysis reports that individual national regulatory authorities (NRAs) require locally authorised providers to complete.<sup>1</sup> There is little consistency in the format or data categories of these requests, and there are significant variations in practice. A number of NRAs impose virtually no reporting obligations, while others make substantial requests.

The consequence is that a provider of cross-border services will expend hundreds of person hours to complete inconsistent forms in multiple languages. All of this adds cost and complexity of providing cross-border services.

4. AT&T believes that if a more harmonised approach to regulatory reporting could be developed, not only would administrative costs and complexities for communications providers be reduced, it would also facilitate improved information sharing and comparative market analysis by NRAs, BEREC and the European Union institutions.
5. Wherever possible in such a common reporting regime, the ideal default position would be that cross-border business providers are exempt from the requirement to provide data, unless the NRA decides explicitly that particular categories of information about business services are necessary from such providers.
6. At a time when other global regulators are taking steps to reduce the reporting obligations<sup>2</sup> placed on regulated entities, AT&T believes that it is appropriate for BEREC to consider practical measures for addressing this challenge.

\* \* \*

---

<sup>1</sup> AT&T described these and other complexities of operating across several EU Member States in our 2011 response to BEREC's public consultation on administrative barriers. (See: [http://berec.europa.eu/files/document\\_register/2012/8/BoR\\_PC02\\_%2811%29\\_01\\_AT&T.pdf](http://berec.europa.eu/files/document_register/2012/8/BoR_PC02_%2811%29_01_AT&T.pdf))

<sup>2</sup> For example, the United States Federal Communications Commission (FCC) recently issued a temporary waiver of its international traffic and revenue reporting requirements while it contemplates a more permanent scaling-back of regulatory burdens associated with international telecommunications services described in the FCC Notice of Proposed Rulemaking released March 23, 2017 (See: [https://apps.fcc.gov/edocs\\_public/attachmatch/FCC-17-28A1.pdf](https://apps.fcc.gov/edocs_public/attachmatch/FCC-17-28A1.pdf))

AT&T would be pleased to answer any questions arising from these comments.

Best regards



---

Antonio Amendola  
AT&T  
Executive Director, International External Affairs  
Rue du Luxembourg 47, 1050 Brussels  
+32 473835084  
[antonio.amendola@intl.att.com](mailto:antonio.amendola@intl.att.com)