

Twilio comments on BEREC's 2025 Work Programme

In response to BEREC's public consultation

Twilio appreciates BEREC's important work to promote full connectivity, foster a healthy and competitive thriving and open digital markets, and the empowerment of end-users (both consumers and businesses and). Twilio welcomes the opportunity to comment on two specific aspects of BEREC's draft Work Programme for 2025.

Twilio submits the following comments.

Draft Work Programme Item 3.3: BEREC external workshop on preventing number misuse and possible fraudulent activities as a result of the impact of new technologies

Twilio appreciates BEREC's intention to convene stakeholders to help build communication and collaboration with industry partners in order to increase the knowledge and seek long-lasting and sustainable solutions.

We hereby register our interest in presenting Twilio's contributions and solutions at BEREC's external workshop planned for Q2 2025.

Twilio cautions against disruptive changes or overly broad interventions, and instead urges BEREC to look at steps that can be taken now to make improvements for businesses and consumers.

As Twilio noted in our response to the European Commission's White Paper entitled "How to master Europe's digital infrastructure needs?", we urge policy-makers (and also national regulatory authorities acting jointly under the umbrella of BEREC) to harmonize and simplify regulatory requirements across the EU. This includes requiring EU Member States to provide for a national number range, which can be used to provide cloud-based communications solutions on an EU-wide basis, and permitting number sub-assignment to support a more efficient distribution and management of numbering resources.

However, this should not include any undue restrictions on number sub-assignment. Overly restrictive approaches have unfortunately been adopted on an ad hoc basis in some EU Member States, whilst others have more sensibly chosen to organize sub-assignment in a way that safeguards competition and end-user interests. Greater harmonized and sensible Know Your Customer (KYC) requirements across Member States could also lead to greater benefits. BEREC urging wider adoption of solutions that include Rich Call Data (RCD) could also be useful.

Additionally, Artificial Intelligence (AI) represents an opportunity as identified by BEREC (p.37, paragraph 2), to provide beneficial solutions, particularly with respect to preventing fraud and spam. Twilio cautions against taking broad action to limit AI technologies, or calling for overly

burdensome regulatory requirements until there has been more time to evaluate the impact of the technologies and their benefits to consumers and businesses.

Draft Work Programme Item 3.7: ECASEC-BEREC: Guidelines on preventing smishing

Twilio appreciates BEREC's collaboration with ECASEC and other stakeholders on important security-related issues.

Twilio urges caution in developing overly broad or prescriptive new guidelines and instead urges BEREC to consider efforts already underway to address smishing and vishing. As Twilio noted in its response to the European Commission's White Paper entitled "How to master Europe's digital infrastructure needs?", full harmonization of Know Your Traffic (KYT) rules and any SenderID requirements across EU Member States would help end the trend of worrying fragmentation along national lines, and help ease compliance burdens for companies of all sizes.

BEREC should consider efforts already underway, including in particular the initiatives taken in Ireland. Following extensive public consultation at national level, Ireland has moved forward with a sensible approach on SenderID that could potentially be replicated in other EU Member States and other European jurisdictions. A national SenderID list, if instituted properly with appropriate industry input, has the potential to streamline compliance for businesses, while promoting competition. By contrast, hastily or restrictively defined SenderID systems entail risks of unduly favoring the country's Mobile Network Operators, to the detriment of competition and the innovative offers that companies such as Twilio offer.

Finally, with the upcoming evaluation of the European Electronic Communications Code (EECC) expected to be completed by the end of 2025, we urge BEREC to take a measured approach on both of these workstreams. It is important to maintain coherence and avoid disruption for both industry and regulators currently working to address existing challenges.