



**4iG GROUP'S RESPONSE TO  
DRAFT BEREC OPINION ON THE NATIONAL IMPLEMENTATION AND  
FUNCTIONING OF THE GENERAL AUTHORISATION, AND ON THEIR IMPACT ON  
THE FUNCTIONING OF THE INTERNAL MARKET**

4iG Plc (4iG) is a Hungarian majority-owned company seated in Budapest. 4iG is listed on the Budapest Stock Exchange and it fulfils the role of the parent company of a leading regional telecommunications group in Hungary and the Western Balkans (4iG Group), operating mobile networks in three, and fixed networks in two European markets.

4iG appreciates the opportunity to provide feedback on the draft BEREC Opinion on the national implementation and functioning of the general authorisation, and on their impact on the functioning of the internal market.

4iG agrees with the assessment of BEREC of the state of play in terms of the implementation of the general authorization regime. The harmonized and mostly streamlined notification system stepping into the place of former fragmented granting procedures of the member countries substantially reduced the entry burden for alternative competitors and accelerated the entry process. This has contributed significantly to the development of competition in the electronic communications market.

**In chapter 3, on page 7** BEREC notes that most NRAs proceed to monthly uploads, while others upload notifications upon receipt, weekly, every 3-4 months, when the data is ready, or even once a year.

According to 4iG it would be beneficial to enhance the reliability of the database by ensuring the data it contains is kept up to date. To achieve this, an update interval of one per year or 3-4 months may not be optimal. A maximum interval of 2 months could be a suitable recommendation for all national regulators.

**In chapter 5, on page 10** BEREC draft opinion concludes that for a better common understanding and consistent interpretation of the scope of certain categories of networks and services in the BEREC template, also with a view to any market developments, some activities like M2M services, Satellite Internet Access, 4G/5G networks for fixed access or TETRA, could be briefly described, even by means of examples.

4iG agrees with this BEREC conclusion. A more consistency in definitions is needed so as to guarantee regulatory transparency and certainty in the Digital Single Market in the EU and in the accession and candidate countries that have adopted the EU regulatory framework as their national reference for electronic communications regulation.

The significance of the consistent adoption of definitions is highlighted in particular in the case



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of cross-border services and those service notifications which make advantage of the country of origin principle.

In terms of the abovementioned 4G/5G networks for fixed access, due to technology developments, it would be useful to define activities and services a technology neutral way. Thus 4iG suggests to describe mobile radio service for fixed location access instead of 4G/5G networks for fixed access.