



MVNO Europe,
38 Rue de la Loi,
1000 Brussels, Belgium
info@mvnoeurope.eu

To President of the European Commission, Ursula Von der Leyen
and Executive Vice-President, Henna Virkkunen

European Commission - Berlaymont,
200 Rue de la Loi,
1000 Brussels, Belgium

Brussels, 18th November 2025

Subject: Open Letter to President von de Leyen: Europe's Digital Future Depends on Diversity and Innovation

Dear President von der Leyen,

MVNO Europe fully supports the European Commission's bold and visionary ambition to make digitalisation and connectivity a top priority. However, as discussions on the upcoming **Digital Networks Act (DNA)** progress, MVNO Europe must issue a clear warning: **this historic opportunity will be lost if competition is sacrificed for deregulation and market concentration for the benefit of dominant telecommunications groups.**

Europe's strength is diversity. Its progress depends on competition, the real engine of innovation and affordability. Yet, today, mobile communications markets remain constrained by restrictive practices, with the largest operators in particular denying fair access and stifling innovation by alternative players. Mobile Virtual Network Operators (MVNOs) **are proven innovators and consistently rated among the best for customer satisfaction.** However, MVNOs still face barriers to non-discriminatory wholesale access and cross-border operations, which undermines the vision of a truly connected European Single Market.

If the current uncritical narrative around in-market consolidation prevails, without a proper assessment of its competitive impact, Europe risks having fewer choices, slower innovation, and weaker industrial competitiveness, as service-level competition, the real driver of innovation, would be eroded. The future of mobile, the Internet of Things (IoT), Machine-to-Machine (M2M), and connected vehicle services depends on fair wholesale access for MVNOs that keep the digital ecosystem open and competitive, not on shrinking the market to a handful of players. Real **economies of scale come from a genuine European approach, not national mergers.** Mergers in the mobile sector, as well as new interventions about spectrum licenses, must carefully consider the market reality and include, when necessary, pro-competitive measures to guarantee contestability at the level of connectivity and services.

The Digital Networks Act is a once-in-a-generation opportunity to build a Single Market where every operator can invest and innovate. **European digital innovation and competitiveness thrive when there is fair wholesale access, interoperability and customer choice.**

To achieve this, MVNO Europe calls on policymakers to uphold and strengthen core principles of the **European Electronic Communications Code (EECC) within the upcoming DNA.**

First, provisions on non-discriminatory wholesale access in spectrum licenses for MVNOs are essential to keep Europe's digital ecosystem open and competitive. Without it, innovation stalls and choice disappear. To safeguard this, the **DNA must maintain the EECC's Article 52(2)**, which empowers authorities granting radio spectrum licences **to impose non-discriminatory wholesale access obligations**. Preserving this safeguard ensures that MVNOs, consumer- and business-focused alike, can play their challenger role and drive innovation, including in IoT, M2M, and connected vehicle services, while promoting diversity and the efficient use of spectrum as a public resource.

Second, **safeguarding competition requires that the Significant Market Power (SMP) regime set out in the EECC remain intact**. Regulators need the ability to identify and remedy market power on all markets. Without this safeguard, abuse of dominance goes unchecked and effective competition can collapse.

Moreover, to **ensure Europe's global industrial competitiveness, the DNA must deliver real change by creating a genuine Single Market for cross-border industrial connectivity services**.

MVNO Europe urges that the DNA include clear and harmonised definitions for M2M, IoT and Connected Vehicle services. This is essential to eliminate regulatory uncertainty and ensure consistent implementation across Member States.

In addition, the **DNA must require mobile network operators to grant permanent roaming access for industrial M2M, IoT, and Connected Vehicle services**. This will enable all Mobile Network Operators (regardless of size) and MVNOs to support seamless cross-border operations of EU industry.

Finally, the **DNA must enable MNOs and MVNOs to connect to multiple radio access networks in every Member State for industrial IoT, M2M and connected vehicle services**. Dynamic multi-network connectivity is vital for the digitalisation of European industry, which requires connectivity services that are resilient, diverse and uninterrupted.

The automotive sector is a cornerstone of Europe's economy and industrial identity. Driving digital innovation in this sector is not only critical to maintaining Europe's global competitiveness, but also to shape the future of mobility itself. By enabling open and secure connectivity services for connected and autonomous vehicles, and promoting competition and diversity in its supply, Europe can set global standards for innovation, sustainability and safety, ensuring that Europe leads, rather than follows, **in the next generation of automotive technologies**.

MVNO Europe welcomes the Commission's ambition to foster a competitive digital future for the Union. To turn that ambition into reality, the DNA must preserve a dynamic and contestable market that empowers MVNOs to operate efficiently across the European Union. This is how Europe drives innovation, attracts investment, and ensures that its industries can compete on the global stage.

MVNO Europe Members already operate successfully in Member States (Business-to-Consumer MVNOs) and across borders (Business-to-Business MVNOs). **MVNOs look forward to continuing to drive innovation, choice, and market diversity under improved and fairer conditions following the adoption of the DNA**.

MVNO Europe stands ready to work with the Commission and Member States to ensure that the DNA delivers a Single Market that is open, resilient and innovation-friendly.

Jacques Bonifay,
President of MVNO Europe



