

Proposed improvements to the new EU roaming regulation

General improvements/additions

- In order to avoid "bill shocks" for unsuspecting customers using roaming services, and to ensure that basic functionality (calls and SMS) can not be switched off unilaterally by operators, upon coming into force of the regulation, the standard settings for customers who make a new (pre-paid or post-paid) contract and for customers who are currently on a Eurotariff shall be so that voice & SMS roaming is enabled and data roaming is disabled.
- To ensure price transparency and avoid misunderstandings, the Eurotariff should be valid for all calls made and SMS sent when roaming, to any EU state and not just within the visited state and home.
- The most important measures against bill shock – the information about the costs of using services while roaming and the cut-off limits – should apply to all countries for EU consumers, even outside of the EU as a measure to protect consumers.
- While the proposed obligation to grant access to other operators for roaming services at the regulated whole caps is laudable, on its own it does not suffice to ensure that those operators will be granted access at usable conditions. This provision will only work if a non-discrimination clause is included that will ensure that access for all operators must be granted at the same conditions that apply for other operators.

Prices

As the current prices for roaming services are still much higher than domestic prices, we believe that a faster alignment of roaming prices should be possible. We therefore propose lower price caps for roaming calls and SMS; making the receiving of calls free, and improving the proposed data price caps.

- To improve the prices for roaming calls, we believe that the following wholesale charges are desirable:

2012: 0,10€/min	2013: 0,06€/min	2014: 0,04€/min
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- For active calls in retail, the following prices are desirable (the first 30 seconds being charged the same):

2012: 0,15€+VAT/min	2013: 0,13€+VAT/min	2014: 0,11€+VAT/min
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- For passive calls, prices should be capped further and the receiving of calls when roaming should be free from 2014 on. This is desirable as charging for calls received is not common practice on European mobile phone networks and therefore should not be expected when roaming and as it would create a further incentive for operators to further lower prices for other roaming services.
The following prices would be desirable:

2012: 0,05€+VAT/min	2013: 0,03€+VAT/min	2014: Free
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- For SMS in retail, the following prices are desirable:

2012: 0,07€+VAT/min	2013: 0,07€+VAT/min	2014: 0,05€+VAT/min
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- While the proposed price caps for data roaming are a laudable step in the right direction, they are still prohibitively expensive and far from preventing bill shocks and allowing users to use the internet at fair prices when abroad. Considering that the prices for mobile data have fallen massively in the last years and the "production" of 1 GB of data only costs about 1€ nowadays, the price caps should be set much lower.

We therefore propose wholesale charges for data of 0,25€/MB from 2012, 0,15€/MB from 2013 and 0,05€/MB from 2014. Retail charges for data should be much lower than currently proposed and charged per Kilobyte with no rounding up. For data in retail, the following prices are desirable:

2012: 0,50€+VAT/min	2013: 0,30€+VAT/min	2014: 0,10€+VAT/min
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- In order to effectively prevent users from "bill shock" in future, we propose a cut-off limit of 50€/VAT/month for roaming costs incurred by calls and SMS, modelled on the similar cut-off limit for data roaming.

Scope of the regulation

- In addition to the measures taken by the EU to lower the costs for roaming, further measures should be taken in order to create a common market for telecommunications and to allow all Europeans to enjoy borderless communication within the EU. We believe this has become a necessity in order to make the European internal market usable for all citizens and businesses.
- The EU should therefore actively work on harmonising national telecommunications regulations, especially to ease access for operators to build cross-border networks and to bring termination fees in line across the EU. As a long-term strategy, mobile devices should be enabled to connect to any operator's access network which can provide the contracted signal level, if the contracted service provider cannot, and for there to be no surcharge levied from the customer where another operator's network is used.
- The EU should furthermore be tasked to work on lowering the prices for international/long-distance calls within the EU to bring them down to a similar level as domestic calls.
- The European Commission should be tasked to actively seek to extend the roaming rules to other states outside of the EU, especially those bordering the EU and candidate states, by way of bilateral or multilateral agreements.