ANALYSIS OF THE PUBLIC CONSULTATION ON THE WHITE PAPER ON EUROPE'S DIGITAL INFRASTRUCTURE NEEDS

QUANTITATIVE ANALYSIS

Political Intelligence

Introduction

The following Quantitative Analysis outlines stakeholders' positions with respect to the White Paper's four **workstreams**:

1) Regulatory Intervention in the Interconnection Market
2) Extension of EECC's Scope
3) Universal Service Obligations
4) Sustainability Obligations for digital services

The analysis is based on a sample of **272 responses** from the European Commission's public consultation on the White Paper "*How to Master Europe's Digital Infrastructure Needs*," which was concluded in June 2024. **Out of the 357 total contributions** submitted during the consultation, **individual and anonymous responses were excluded from the analysis** as they were deemed irrelevant to the consultation's outcome and related trends.

The sentiment analysis has been done according to **four classification rules**:

- **'yes'**- the stakeholder agrees with the potential regulatory or legislative developments described in the White Paper.
- **'no'**- the stakeholder opposes potential regulatory or legislative developments described in the White Paper.
- **Mixed/Neutral -** the stakeholder takes a **neutral/high-level position**.
- "N/A" – the **stakeholder does not deal with the topic** in its submission

Quantitative trends across the four main workstreams are presented both numerically in tables and visually through graphical representations. Each section concludes with an illustration of the quantitative analysis, providing a comprehensive overview of stakeholders' positions on the respective issues.

Note: The following analysis has been performed with the data extracted from the "Data & Figures with N/A" section of the "White Paper Public Consultation Analysis" available on Political Intelligence's website alongside this quantitative analysis.

Annex: The Annex to the quantitative analysis contains the data extracted from the "Data & Figures without N/A" of the "White Paper Public Consultation Analysis" available on Political Intelligence's website alongside this quantitative analysis.

Disclaimer: The study reflects the assessment of Political Intelligence Brussels and does not represent the perspectives of its clients or other Political Intelligence offices located across Europe.

Regulatory Intervention in the Interconnection Market

I - Interconnection

		TOTAL	Against Intervention	Pro Intervention	Mixed/Neutral	N/A
GENERAL	Number	272	79	32	6	155
	Percentage		29%	11,8%	2,2%	57,0%

Regulating the Interconnection Market
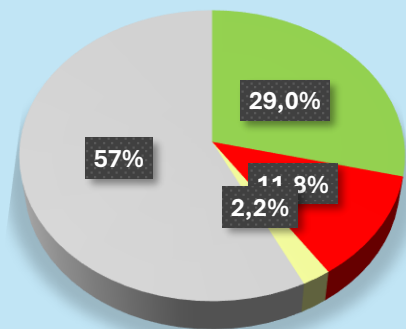
29,0%
57%
11,8%
2,2%

		TOTAL	Against Intervention	Pro Intervention	Mixed/Neutral	N/A
BXL-based Trade Associations	Number	43	20	2	0	21
	Percentage		46,5%	4,7%	0,0%	48,8%
National Trade Associations	Number	81	25	13	4	39
	Percentage		30,9%	16,0%	4,9%	48,1%
Governments/Regulators	Number	29	7	2	2	18
	Percentage		24,1%	6,9%	6,9%	62,1%
Civil Society/NGOs	Number	11	5	1	0	5
	Percentage		45,5%	9%	0%	45,5%
Companies	Number	86	17	14	0	55
	Percentage		19,8%	16,3%	0,0%	64,0%

Academics/Research Institutes	Number	18	2	0	0	16
	Percentage		11,1%	0,0%	0,0%	88,9%

Individual Commentators	Number	4	3	0	0	1
	Percentage		75,0%	0,0%	0,0%	25,0%

The analysis shows that, out of **272** categorised responses, **57%** chose to abstain from commenting on the interconnection market.

Among those who did respond, **79 stakeholders (29%) oppose** regulatory intervention in the interconnection market, including mechanisms like dispute resolution or direct payment systems. Conversely, **32 stakeholders (11.8%)** were in favor of such regulatory intervention. **The distribution of these positions closely mirrors the stances taken during last year's public consultation on the "Future of the Connectivity",** where a majority of stakeholders explicitly opposed to the proposed mechanism of mandatory financial contributions from Content Application Providers (CAPs) to Internet Service Providers (ISPs), including the sending party network pays (SPNP) regime.

Tech companies (including cloud providers and CDNs), the audiovisual sector, consumers, alternative operators, SMEs/start-ups and CSOs/NGOs predominantly oppose any regulatory intervention that could lead to an interconnection levy. However, major European telecom operators and their representative bodies at both European and national levels advocate for regulatory measures to rebalance the relationship between ISPs and CAPs/CDNs in the interconnection market.

- **Brussels-based trade associations**: A significant majority (**46.5%**) of respondents, represented by a very heterogenous group of stakeholders, **are against** regulatory intervention in the interconnection market. Only **ETNO** and **GSMA (4.7%) support** regulatory intervention in the interconnection market. **48,8%** did not address the issue in their submission. Furthermore, it is worth noting that the two associations, besides supporting the introduction of a dispute resolution mechanism, call for a revision of the Open Internet Framework and a contextual Commission's Recommendation.

- **National Trade associations:** Nearly half of the national trade associations (**48.1%**) do not express interest in or take a clear position on interconnection. The majority of national associations that did take a position (**30.9%**) **oppose regulatory intervention**. This stance is supported by a diverse group of stakeholders, including challenger operators (e.g. **BREKO, EuroFiber, European Local Fibre Alliance, Swedish Local Fibre Alliance**), national consumer organisations (**Verbraucherzentrale Bundesverband**), internet exchange points (**TOP-IX, NIX.CZ**), tech associations (e.g., **Digital Poland, ISPA Austria, Technology Ireland**), and SME representatives (**BUGLAS and Chamber of Progress**). Notably, respondents at the national level are concerned that regulatory intervention could reinforce the dominant position of traditional ISPs in national markets. Conversely, **13 national associations (16%) support regulatory intervention**. This group includes national tech and telecom associations such as **Digital ES, FFT, the Federation of Polish Entrepreneurs, Konfederacja Lewiatan, and the Telecom Industry Association Denmark**. Unlike the trend observed at the EU level, a few SME representatives (**CDU Economic Council)** and consumer organisations (**U.Di.Con**) also support regulatory intervention. Four national associations took a neutral stance on the topic (**AOTEC, Adigital, Confederation of Finnish Industries, Coalizione per il Cloud and Fixed Wireless Access**)

- **Companies**: Out of the **86 companies that responded to the consultation, 64%** did not express a clear position on regulatory intervention in the interconnection market. The **quantitative difference** between those opposing and supporting intervention is **narrower compared to what was observed at the association level.** Of the **31 companies that did respond, 17 oppose regulatory intervention**, while **14 support it.** The **distribution of stakeholder types mirrors the EU level**, with major European national operators supporting regulatory intervention, standing in contrast to the broader ecosystem.

- **Governments/Regulators:** Similarly, the **majority of public sector stakeholders did not address or take a position on the issue (62.1%).** Among the **20.7% of stakeholders who oppose** regulatory intervention, **4 Member States** - **Denmark, Finland, Germany**, and **The Netherlands** - highlight the proper functioning of the interconnection market, echoing **BEREC's stance**, expressed in several IP-Interconnection assessments. The **only significant public sector stakeholder** supporting regulatory intervention is **Spain**, which advocates for fair and reasonable commercial conditions in interconnection agreements, including support for dispute resolution mechanisms. **Ireland** and **Hungary** took a neutral stance on whether the interconnection market should be further regulated.

- **CSOs/NGOs:** Consistent with last year's "network fees debate," there is **strong opposition** from CSOs and NGOs to regulating the interconnection market. Among the **6 organisations** that responded, **5 oppose intervention.** The **European Association for Digital Transition** is the **only organisation** in this category that emphasizes the need for a balanced approach, **suggesting financial contributions** from all players benefiting from network use.

- **Academics/Research Institutes:** Only **2 out of 16 stakeholders** in this category addressed the interconnection issue in its submission, **opposing regulatory intervention** (**The Center for Economic and Market Analyses** and **Barbara van Schewick**).

- **Individual Commentators:** Among the **4 individual commentators** (including Konstantinos Komaitis and Dean Bubley), **3 expressed opposition** to regulatory intervention in the interconnection market.

EECC's Scope Extension

		TOTAL	Against Extension	Pro Extension	Mixed/Neutral	N/A
				II - Cloud-Telco Convergence		
GENERAL	Number	272	78	50	15	129
	Percentage		28,7%	18,4%	5,5%	47,4%
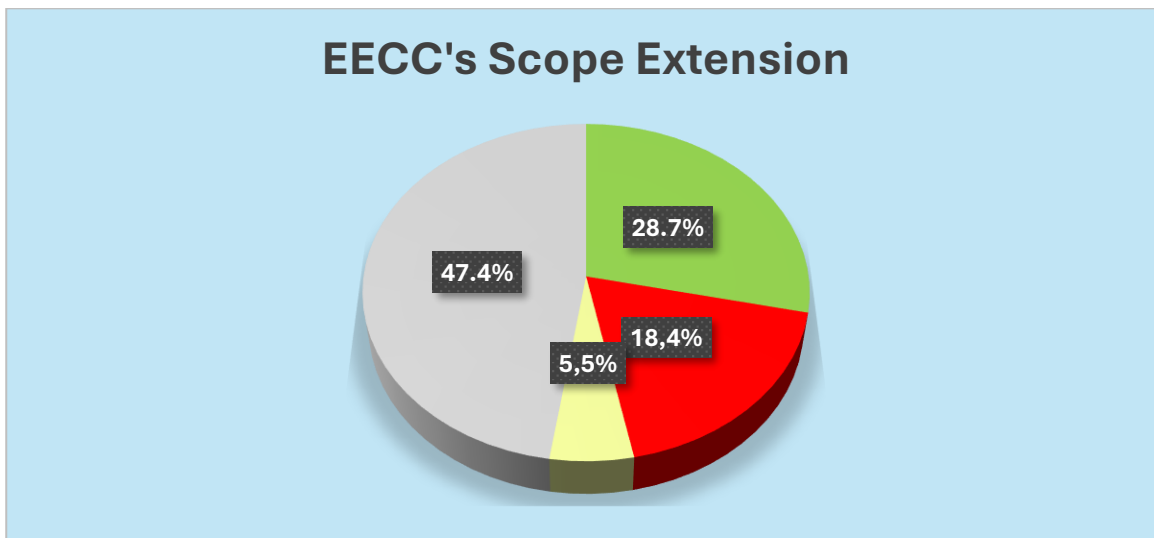
EECC's Scope Extension — pie chart: 28.7%, 18,4%, 5,5%, 47.4%

		TOTAL	Against Extension	Pro Extension	Mixed/Neutral	N/A
BXL-based Trade Associations	Number	43	17	4	1	21
	Percentage		39,5%	9,3%	2,3%	48,8%
National Trade Associations	Number	81	25	22	5	29
	Percentage		30,9%	27,2%	6,2%	35,8%
Governments/Regulators	Number	29	6	1	5	17
	Percentage		20,7%	3,4%	17,2%	58,6%
Civil Society/NGOs	Number	11	3	1	0	7
	Percentage		27,3%	9,1%	0,0%	63,6%
Companies	Number	86	22	20	4	40
	Percentage		25,6%	23,3%	4,7%	46,5%
Academic/Research Institutes	Number	18	4	2	0	12
	Percentage		22,2%	11,1%	0,0%	66,7%

Individual Commentators	Number	4	1	0	0	3
	Percentage		25,0%	0,0%	0,0%	75,0%

Almost half (**47.4%**) of the 272 responses logged in the analysis do not reflect on extending EECC's **scope to other digital infrastructure players** (especially cloud and CDN providers). Among stakeholders participating in the public consultation, **28.7% of respondents do not support** the extension of the EECC to cloud, and **18.4% support the extension of the regulatory framework.** Therefore, the **general trend reveals an opposition to the cloud/telco convergence narrative** outlined in the White Paper and contextual legislative developments.

- **Brussels-based trade associations**: A heterogeneous group of stakeholders, accounting for the **39,5%** of the organisations included, **do not support the extension of the scope of the EECC**. The group includes associations of cloud service providers (e.g. **CCIA, DOT, ITI, BSA, CISPE**), alternative operators (**MVNOE, ECTA**), consumers (**BEUC**) and the audiovisual sector (e.g. **VOD Coalition, Video Games Europe**)**.** Reflecting the pattern observed with the first workstream of this analysis**, 4 associations (9.3%)** belonging to the telecom sector **support** the extension (**ETNO, GSMA, AOITI and GigaEurope**). Notably, half of the Brussels-based associations participating in the public consultation (**48.8%**) **do not address the topic**.

- **National Trade Associations:** Consistently on what was observed at the supranational level, national trade associations (**30.9%**) **rejecting the proposal** to extend EECC's scope outweigh associations in favour (**27.2%**) of a scope's extension. The majority of national associations favouring a scope extension come from Poland, Spain and Italy.

- **Companies**: While Brussels-based business associations clearly reject the extension of the EECC, the **difference between opposing and supporting positions becomes narrower** at the company level. Specifically, **25.6%** of companies **do not support** expanding the scope of the EECC, while **23.3% are in favour** of such an expansion. These two factions mirror the divide observed in the interconnection market debate. On the one hand, tech companies (including **CAPs**, **cloud providers** and **CDNs**), the audiovisual sector (e.g **Netflix, Sky**), challenger operators (e.g. **Transatel**) internet exchange points (e.g. **France-IX**) oppose the extension of the EECC' scope. On the other hand, all major European telecom operators support the extension, with two notable exceptions: the Portuguese operator **NOS**, which is not addressing this topic, and **Iliad**, which opposes the extension. Almost half (**46.5%**) of the companies that responded to the public consultation **do not address the issue** of extending the EECC to cloud services or other digital infrastructure players.

- **Governments and Regulators**: The public sector **pays little attention** to cloud/telco convergence (**58.6% did not address the topic**). Nonetheless, among participants, **20.7%** do not believe the scope of the **EECC should be extended.** Such a group is formed by one regional authority and **5 Member States**: Belgium, Estonia, Finland, Ireland and Slovenia. Only **one public sector bodies**, namely the **Cyprus's Ministry of Research**, believes the **scope should be extended**. A notable trend observed in responses from this category is the **neutral positioning** among 5 key institutions - **BEREC, Czech Republic, Denmark, Germany and Hungary** - who emphasize the need for further analysis and debate regarding the scope extension of the EECC.

- **CSOs/NGOs**: Only **4 out of 11 stakeholders** from this category take a position on this workstream. Associazioni Copernicani, ISOC, and epicenter.works oppose an extension of the regulatory framework, while the European Association for the Digital Transition is the **only one supporting it**.

- **Academics/Research Institutes**: Of the **18 stakeholders** included in this category, only **6 tackled the topic**, and **4 research institutes opposed EECC's extension**.

- **Individual Commentators**: among the **4 individual commentators** included in the analysis, **only Dean Bubley** pushes back (extensively) on the telco/cloud convergence narrative and related positive measures.

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Extension of Universal Service Obligations

III - Universal Service						
		TOTAL	**Against Extension**	**Pro Extension**	**Mixed/Neutral**	**N/A**
GENERAL	Number	272	39	7	16	210
	Percentage		14,3%	2,6%	5,9%	77,2%
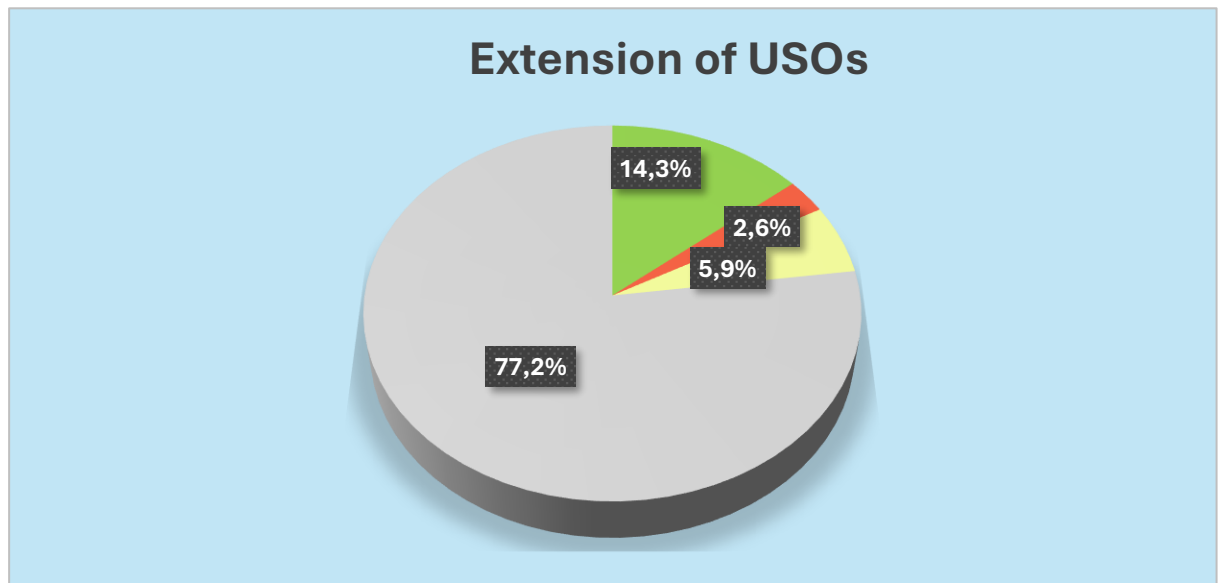
Extension of USOs

14,3%
2,6%
5,9%
77,2%

		TOTAL	**Against Extension**	**Pro Extension**	**Mixed/Neutral**	**N/A**
BXL-based Trade Associations	Number	43	11	0	1	31
	Percentage		25,6%	0,0%	2,3%	72,1%
National Trade Associations	Number	81	13	3	8	57
	Percentage		16,0%	3,7%	9,9%	70,4%
Governments/Regulators	Number	29	3	0	1	25
	Percentage		10,3%	0,0%	3,4%	86,2%

Civil Society/NGOs	number	11	0	0	0	11
	Percentage		0,0%	0,0%	0,0%	100,0%
Companies	Number	86	12	4	5	65
	Percentage		14,0%	4,7%	5,8%	75,6%
Academic/Research Institutes	Number	18	0	0	1	17
	Percentage		0,0%	0,0%	5,6%	94,4%
Individual Commentators	Number	4	0	0	0	4
	Percentage		0,0%	0,0%	0,0%	100,0%

Only a **very limited number of respondents** to the public consultation engaged with the topic of extending Universal Service Obligations (USOs) to new categories of contributors, such as NI-ICS, rendering it **the least addressed workstream in this analysis**.

Among those who did, **38 stakeholders (14%) oppose the extension** of USOs, while **7 (2.6%) support the idea of extending USOs to digital services**. The numerical gap between these positions is largely due to the fact that, unlike in other workstreams, **both tech and telecom operators (including relevant associations) generally align** in either opposing the USOs extension or advocating for a phase-out of the regime in the upcoming revision of the telecom framework. At the aggregate level, the analysis reveals **16 high-level/mixed positions**, mainly from companies and national trade associations.

- **Brussels-based trade associations:** On a **total of 43 associations screened, all the 11 associations dealing with the topic oppose the extension of USOs.** Unlike with other workstreams, **ETNO** and **GSMA seem to align** with the rest of the ecosystem (tech, audiovisual, consumers, alternative operators) on the matter **although using a different narrative.** Instead of underlining the criticalities of an extension, telecom representatives criticise the economic rationale of the regime.

- **National trade associations:** A **large majority of stakeholders** opposing the extension can be observed also at national level with **13 national associations**. Stakeholders in this category include an heterogenous group of stakeholders including the audiovisual sector, telecom operators (traditional and challenger operators) as well as tech trade associations in national markets (e.g. **NL Digital, ISPA Austria, FFT, BREKO**). Only 3 national associations support an extension of USOs obligations (**Open Allies Foundation, Associazione Italiana of Internet Providers and BUGLAS**).

- **Companies**: Among the **21 companies** addressing the extension of USOs in their submissions, positions from telecom and technology representatives align, albeit with differing narratives. Major European telecom operators, including **NOS, Vodafone, and Telekom Austria**, are among the **4 companies advocating for the extension of the regime to include NI-ICS** and, more broadly, to the **largest content generators**.

- **Governments/Regulators:** Only **4 stakeholders** among **governments or regulators** deal with the extension of USOs in their submission. **BEREC**, along with the governments of **The Netherlands and Finland**, express opposition to this extension, while **Germany** adopts a nuanced or mixed stance. Notably, a significant majority of public sector stakeholders **(86.2%) have not articulated a specific position on this issue**.

- CSOs/NGOs, academics and research institutes show no interest in the issue of universal service contribution extension, as none of the respondents to the consultation have touched upon this topic in their response. The same pattern is observable for individual commentators, who do not mention the issue of universal service contribution extension in their responses.

Sustainability Obligations for Digital Services

IV - Sustainability						
		TOTAL	Against Extension	Pro Extension	Mixed/Neutral	N/A
GENERAL	Number	272	29	36	29	178
	Percentage		10,7%	13,2%	10,7%	65,4%

Additional sustainability obligations for digital services
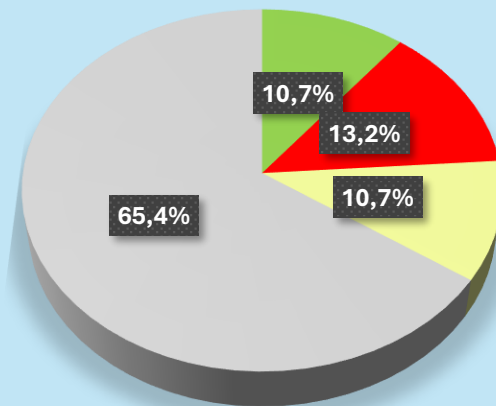
		TOTAL	Against Extension	Pro Extension	Mixed/Neutral	N/A
BXL-based Trade Associations	Number	43	11	4	4	24
	Percentage		25,6%	9,3%	9,3%	55,8%
National Trade Associations	Number	81	10	8	12	51
	Percentage		12,3%	9,9%	14,8%	63,0%
Governments/Regulators	Number	29	0	9	2	18
	Percentage		0,0%	31,0%	6,9%	62,1%

Civil Society/NGOs	**Number**	11	0	0	0	11
	Percentage		0,0%	0,0%	0,0%	100,0%
Companies	**Number**	86	8	10	8	60
	Percentage		9,3%	11,6%	9,3%	69,8%
Academic/Research Institutes	**Number**	18	0	4	3	11
	Percentage		0,0%	22,2%	16,7%	61,1%
Individual Commentators	**Number**	4	0	1	0	3
	Percentage		0,0%	25,0%	0,0%	75,0%

Among the responses analysed, **34.6% of stakeholders** addressed the topic of network sustainability. The analysis reveals that **the ecosystem is almost evenly split on the question of introducing new sustainability obligations**. Of the **62 stakeholders** who engaged with this issue, **36 advocate** for **measures to enhance network sustainability**, focusing primarily on transparency requirements, harmonised indicators, and, from a technological perspective, traffic compression techniques. Conversely, **29 stakeholders oppose additional sustainability obligations**, citing existing technological solutions that already address sustainability concerns and warning of the potential risks of regulatory overload.

- **Brussels-based trade associations**: The sustainability narratives of Brussels-based stakeholders being closely linked with the ability of CAPs to cooperate toward the efficient use of traffic, the two observable fronts replicate the configuration of the debate over the interconnection market. Besides the **55.8 % of** associations that do not address sustainability in their submission, **11 associations** coming from tech and audiovisual domain (e.g. **ITI, CCIA, Digital Europe, MPA, VOD Coalition**) **oppose additional sustainability obligations**. At the same time, representative of telecom operators **ETNO, GSMA and AOTI** calling for increasing responsibility for content provider in the management of data traffic.

- **National trade associations**: At the national level, the disparity between stakeholder groups narrows significantly, with **10 companies** opposing additional sustainability obligations and **8 supporting them**. Several national tech associations (e.g., **Ametic, Bitkom, Digital Poland Association, ISPA Austria, NL Digital, and Tech Ireland**) emphasize the investments made by CAPs in CDNs and codec technologies. In contrast, associations like **Digital ES** and **FFT** criticize Content Application Providers for inefficiencies in video traffic delivery. Notably, a substantial **63%** of respondents in this category did not take particular position on sustainability.

- **Companies:** Sustainability remains marginal also in individual companies' submissions with approximately **81.1% of respondents not directly touching upon the topic**. Among respondents, **8 companies (mainly cloud, CDN provider and audiovisual players)** point out their existing commitment in reducing the sustainability impact of digital technologies, **opposing** the introduction of additional obligations. The **10 companies** asking for increased sustainability obligations for digital services are mainly represented by telecom operators (**KPN, MASORANGE, ORANGE, TIM, Vodafone**) calling for

more responsibility mechanisms for large content providers in traffic management, increasing transparency and eco-design principles.

- **Government and regulators**: among **11 public stakeholders** dealing with the topic, **9** align on the need for increasing legislative measures in the field. The group is formed by **8 Member States** (**Cyprus, Czechia, Finland, Germany, Hungary, Poland, Slovenia and Spain**) ask for the development of common indicators to measure sustainability in the ICT sector and including sustainability in the Code's objectives, alongside **BEREC**. **Spain** specifically links the sustainability argument to the need of introducing **dispute resolution in the interconnection market**.

- **Academics and research institutes**. Among 7 submissions dealing with sustainability, **4 call for increasing transparency and accountability measures** (mandatory reporting standards, industry-wide metrics, more efficient codecs).

- **CSOs/NGOs and individual commentators**: Most of them do not touch upon additional sustainability obligations on digital services.

Annex – Quantitative Data excluding N/A Responses

I – Interconnection

	Total respondents on the question	Against Intervention	Pro Intervention	Mixed/Neutral
GENERAL	**Number** 117	79	32	6
	Percentage	67,52%	27,35%	5,13%

Regulating the Interconnection Market
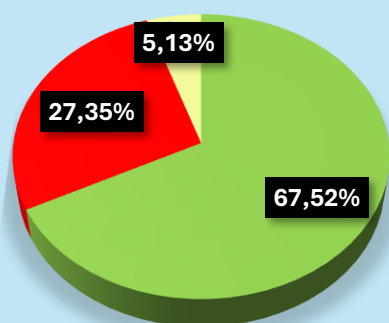
	Total respondents to the question	Against Intervention	Pro Intervention	Mixed/Neutral
BXL-based Trade Associations	**Number** 22	20	2	0
	Percentage	90,91%	9,09%	0,00%
National Trade Associations	**Number** 42	25	13	4

			Against	Pro	Mixed/Neutral
	Percentage		59,52%	30,95%	9,52%
Governments/Regulators	Number	11	7	2	2
	Percentage		63,64%	18,18%	18,18%
Civil Society/NGOs	Number	6	5	1	0
	Percentage		83,33%	16,67%	0,00%
Companies	Number	31	17	14	0
	Percentage		54,84%	45,16%	0,00%
Academics/Research Institutes	Number	1	2	0	0
	Percentage		100,00%	0,00%	0,00%
Individual Commentators	Number	3	3	0	0
	Percentage		100,00%	0,00%	0,00%

II - Cloud-Telco Convergence

		Total respondents on the question	Against Extension	Pro Extension	Mixed/Neutral
GENERAL	Number	143	78	50	15
	Percentage		54,55%	34,97%	10,49%

EECC's Scope Extension
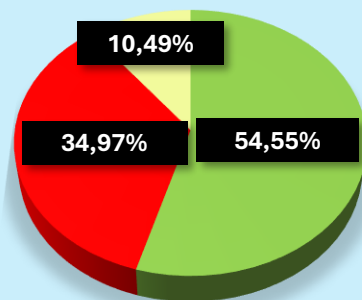
10,49%
34,97%
54,55%

		Total respondents on the question	Against Extension	Pro Extension	Mixed/Neutral
BXL-based Trade Associations	Number	22	17	4	1
	Percentage		77,27%	18,18%	4,55%
National Trade Associations	Number	52	25	22	5
	Percentage		48,08%	42,31%	9,62%
Governments/Regulators	Number	12	6	1	5
	Percentage		50,00%	8,33%	41,67%
Civil Society/NGOs	Number	4	3	1	0

			Against Extension	Pro Extension	Mixed/Neutral
	Percentage		75,00%	25,00%	0,00%
Companies	Number	46	22	20	4
	Percentage		47,83%	43,48%	8,70%
Academic/Research Institutes	Number	6	4	2	0
	Percentage		66,67%	33,33%	0,00%
Individual Commentators	Number	1	1	0	0
	Percentage		100,00%	0,00%	0,00%

III - Universal Service

	Total respondents to the question	Against Extension	Pro Extension	Mixed/Neutral
GENERAL Number	62	39	7	16
Percentage		62,90%	11,29%	25,81%
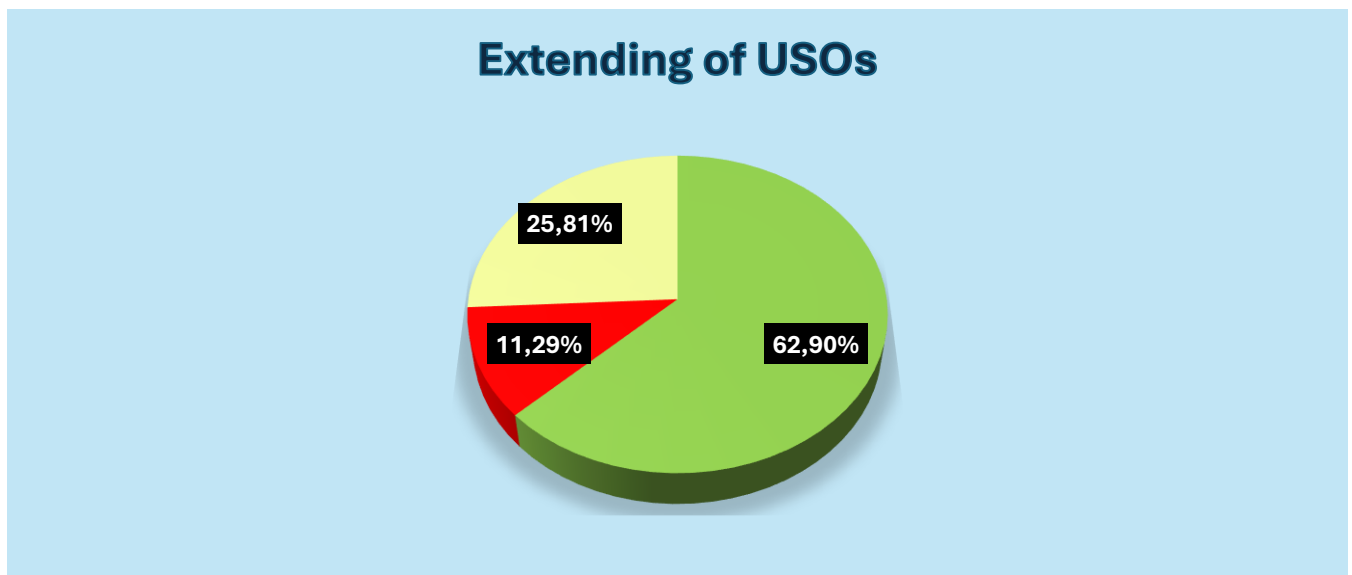
Extending of USOs

25,81%
11,29%
62,90%

	Total respondents to the question	Against Extension	Pro Extension	Mixed/Neutral
BXL-based Trade Associations Number	12	11	0	1
Percentage		91,67%	0,00%	8,33%
National Trade Associations Number	24	13	3	8
Percentage		54,17%	12,50%	33,33%
Governments/Regulators Number	4	3	0	1
Percentage		75,00%	0,00%	25,00%
Civil Society/NGOs number	0	0	0	0
Percentage		0,00%	0,00%	0,00%
Companies Number	21	12	4	5

	Percentage		57,14%	19,05%	23,81%
Academic/Research Institutes	**Number**	1	0	0	1
	Percentage		0,00%	0,00%	100,00%

Individual Commentators	**Number**	0	0	0	0
	Percentage		0,00%	0,00%	0,00%

IV – Sustainability

	Total respondents on the question		**Against Extension**	**Pro Extension**	**Mixed/Neutral**
GENERAL	**Number**	94	29	36	29
	Percentage		30,85%	38,30%	30,85%

Additional sustainability obligations for digital services
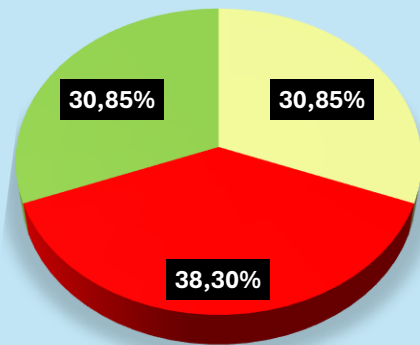
	Total respondents on the question		**Against Extension**	**Pro Extension**	**Mixed/Neutral**
BXL-based Trade Associations	**Number**	19	11	4	4
	Percentage		57,89%	21,05%	21,05%
National Trade Associations	**Number**	30	10	8	12
	Percentage		33,33%	26,67%	40,00%
Governments/Regulators	**Number**	11	0	9	2
	Percentage		0,00%	81,82%	18,18%
Civil Society/NGOs	**Number**	0	0	0	0
	Percentage		0,00%	0,00%	0,00%

Companies	Number	26	8	10	8
	Percentage		30,77%	38,46%	30,77%

Academic/Research Institutes	Number	7	0	4	3
	Percentage		0,00%	57,14%	42,86%

Individual Commentators	Number	1	0	1	0
	Percentage		0,00%	100,00%	0,00%