

Europeans for Fair Roaming

Statement on the consultation ROAMING REGULATION - CHOICE OF DECOUPLING METHOD

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For more information, reactions and comments,
please contact:

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I. Executive Summary

About Europeans for Fair Roaming

“Europeans for Fair Roaming” (www.fairroaming.org) was started by citizens from all over Europe as a Facebook campaign and has since expanded to a network representing more than 150000 Europeans from different backgrounds from all over Europe. The network calls on the EU to end the unfair practice of mobile phone operators charging high roaming fees for using mobile phones in other EU states. Since 2010, Europeans for Fair Roaming has worked to improve the EU roaming regulation and build a borderless European market for telecommunications.

Europeans for Fair Roaming is a key stakeholder in the discussions about the roaming regulation – we are the voice of the users and consumers. We therefore raise the argument from the point of view of the biggest group concerned by the roaming regulation: the end users. Our goal is to ensure a competitive market for roaming and a smooth user experience.

Europeans for Fair Roaming is run by a small team of committed citizens. We are supported by private donations, some members of the European Parliament and the friendly support of the Austrian Institute for European Law and Policy and the European Federalist Party that allow us to use their respective infrastructure.

The current state of Europeans for Fair Roaming is:

- A network of 20 organisations representing/reaching over 150000 people
- Successful in ensuring a user-friendly roaming regulation
- Supported by 14 Members of the European Parliament
- Regular participation in conferences & discussions
- Petitions with several thousand signatures
- Constant communication with key players
- Mentioned in TV, NY Times, Newsweek, TheParliament.com, EurActiv, etc.

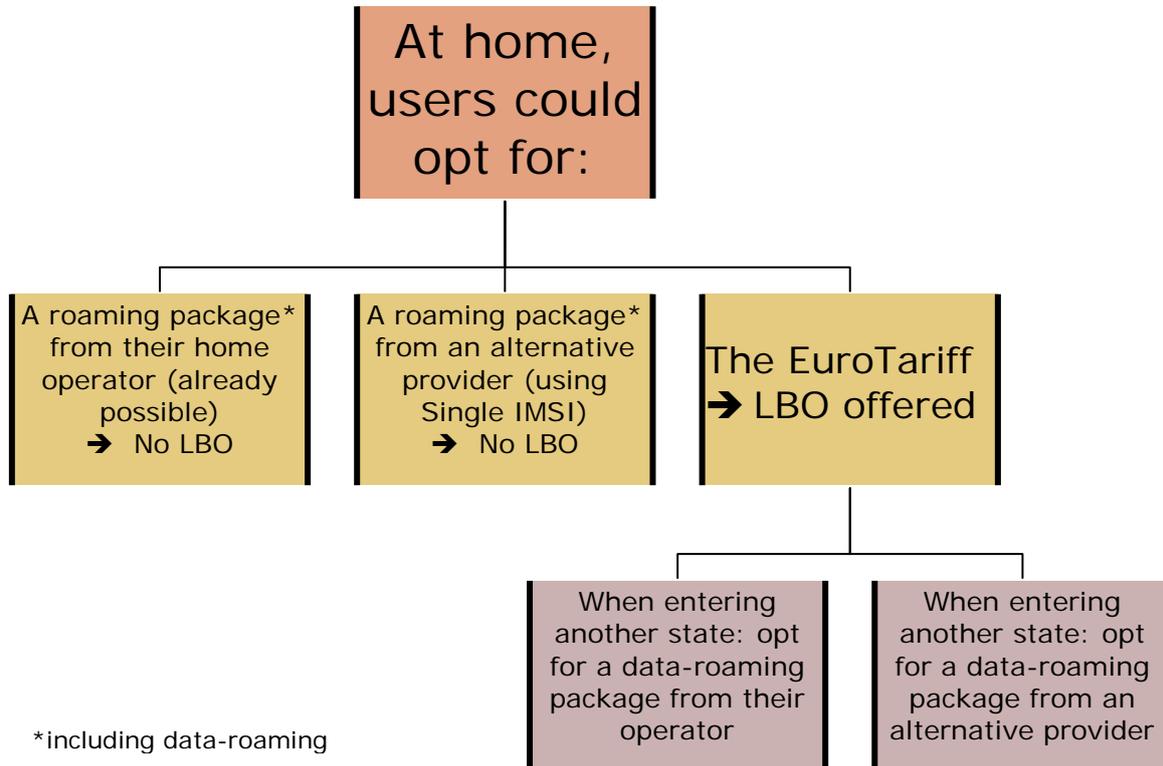
What we call for – a view from the consumer side:

From a point of view of users, the key for the successful development of a roaming market driven by decoupling will be the **ease-of-use and transparency of the process**. In our consultation answer, we therefore will not answer all questions (and we can not answer all questions as we are not an operator) but we will concentrate on those issues that are important for ensuring the best user-experience.

We believe that a combination of the Local Break-Out option for EuroTariff users and the “Single IMSI” solution for other users will ultimately deliver the best results in this regard. In order to avoid confusion and overlap concerning those two approaches, we believe it would be best to make sure they are being communicated differently and clearly separated. Local Break-Out for data should therefore only be available for users who have opted for a EuroTariff with their operator and only for a limited time (i.e. the time they spend in the visited state). But once they make use of a package offered by their operator in advance, or they opt for another operator’s package in advance (using Single IMSI) LBO shall not be available anymore.

An outline of the different options:

We believe there should be three different, mutually exclusive scenarios:



II. Answers to the Consultation questions

As we are concentrating on the point of view of consumers, we will only be able to answer Questions 1, 2, 4 and 7.

Questions 1 and 2

Q1. Do stakeholders agree that the basic version of LBO should be introduced in July 2014? What are the elements that may hinder or facilitate the diffusion?

Q2. Should co-operative efforts be made to develop a more user-friendly version of LBO for subsequent evolution? What kind of efforts would be most productive? Could you provide any cost estimations for the development of user-friendly interfaces? Can BEREC assist with this process?

In order to implement the new EU roaming regulation, it is **necessary to introduce Local Break-Out in July 2014**. In order to avoid confusion with other roaming offers (and especially the ARP Single-IMSI variants) we propose that Local Break-Out should be made available to all users using a EuroTariff that have not opted for any other (data-)roaming packages in July 2014. Those who already opted for a data-

roaming package with their operator or an alternative roaming provider will not be given the option to use LBO.

In order to be as user-friendly as possible, when first connecting to the internet abroad, users shall be presented with an **assistant-style interface for selecting their LBO operator** in which **all available operators (including their home operator) are listed**, together with an overview over their offer, the prices and terms of use. There, users must be able to get an **overview over the offers and a very simple way to choose their preferred operator and the time frame** in which they wish to use this operator for data roaming. Before completing the order, users shall be given an **estimation for the full costs** of booking their desired package. Until they completed this process, **all other data traffic must be blocked** to avoid unwanted charges being accumulated before the user has purchased a package (for example by a smart phone or tablet downloading messages in the background).

We believe it is desirable if **EU bodies, operators and organisations representing users work closely together** (under the leadership of the Commission or BEREC) in order to define and develop the way this selection process for LBO works. This way, a simple and user-friendly solution could be developed that could then be adapted and used by all operators.

Questions 4 and 7

Q4. Do you agree that Dual IMSI should not be implemented in July 2014?

Q7. Do you agree that a version of the Single IMSI family should be implemented in July 2014? Which elements are key to a successful implementation?

We agree that at the moment, **Dual IMSI is likely to be too complicated and cost-intensive** to be a viable option for decoupling. But we call on BEREC and the Commission to monitor the developments in this area as this may change in the coming years, especially with the introduction of virtual IMSI.

But a **Single IMSI solution must be introduced in July 2014**, parallel to LBO. This should work largely as resale agreements, where the home operator shall keep technical control and billing for those arrangements.

As stated above, in order to avoid confusion and overlap between the different solutions, users who **opt for an alternative roaming operator in advance (using this approach) or a roaming package from their own operator that includes data shall not be able to use LBO anymore.**

As in LBO, **ease-of-use and transparency will be the most important issues to make decoupling a success.** We therefore propose that home operators should be obliged to regularly inform their customers about the ability to opt for an alternative provider and ensure that the change to an alternative provider is done swiftly, without hesitation and free of charges, when a customer demands this.

Whether or not the solution implemented in July 2014 should just be a simple Single IMSI or "Single IMSI+" should be decided depending on which of the two solutions is the most user-friendly.