

Completing the single roaming market: extending roaming rules to all intra-EU communications

Input from the Federation of German Consumer Organisations
(Verbraucherzentrale Bundesverband - vzbv) on BEREC's Call for Inputs
to support the preparation of the 2027 BEREC Opinion on the Roaming
Regulation

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I. Relevance for consumers

European consumers increasingly live, work and travel across borders. At the same time, everyday life is becoming ever more digital. Consumers expect seamless access to communication services, information, navigation and entertainment regardless of their location within the European Union.

The Roaming Regulation has become one of the most visible and successful achievements of the Digital Single Market. It enables consumers to remain connected while travelling without worrying about excessive charges and thereby supports freedom of movement across the European Union.

And its importance continues to grow. Recent reports show that mobile data consumption abroad is increasing significantly, while traditional voice calls and SMS are declining. In Germany, data traffic generated abroad and routed to Germany increased by 7 per cent in 2025 compared with 2024, whereas outgoing call minutes and the number of outgoing text messages decreased by 20 per cent and 36 per cent respectively.¹

At the same time, some challenges remain. Many consumers are still unaware that the protections of the Roaming Regulation do not apply to international calls made from their home country to another EU Member State. As a result, they may still face unexpectedly high charges when calling friends or relatives abroad, contacting accommodation providers, or making travel-related arrangements.

Consumer advice centres and regulatory authorities also continue to receive complaints concerning unintended international roaming, particularly in border regions where devices may automatically connect to networks outside the EU roaming area. Such situations may lead to substantial and unexpected costs.

¹ Bundesnetzagentur, Jahresbericht Telekommunikation 2025 [Annual report on Telecommunication 2025], p. 29.

II. Executive summary

The Roaming Regulation² has been highly successful in delivering affordable and reliable mobile communications throughout the European Union. The ‘Roam Like at Home’ regime has generated substantial consumer benefits and contributed significantly to the Digital Single Market.

The vast majority of providers comply with the rules, meaning there are few complaints from consumers; indeed, the Federal Network Agency, as the competent supervisory authority in Germany, lists just one case under review in its 2025 report³.

It is also to be welcomed that, even following the UK’s exit from the EU, many providers continue to voluntarily apply the ‘Roam Like at Home’ principle to the country. Some providers also voluntarily extend similar benefits to communications and data usage in Switzerland.

At the same time, the roaming market is constantly evolving, which is why vzbv welcomes the evaluation planned for 2027. vzbv would like to thank BEREC for the opportunity to provide input.

From a consumer perspective, the core principles of the Regulation should be maintained and further strengthened. vzbv calls on BEREC and the European Commission to:

- **Preserve and strengthen the ‘Roam Like at Home’ principle**, including the requirement that roaming services be provided under conditions comparable to those enjoyed domestically.
- **Improve protection against unintended roaming**, particularly in border regions where consumers may unintentionally connect to networks outside the EU roaming area and incur substantial charges.
- **Strengthen safeguards for non-terrestrial networks**, including satellite, maritime and in-flight connectivity services, through improved consumer protection measures and transparency requirements.
- **Phase out roaming restrictions applied to unlimited domestic data tariffs**, reflecting changing consumer expectations and the growing availability of unlimited mobile offers across the Union.
- **Explore long-term solutions for intra-EU communications**, with the objective of ensuring borderless communication between Member States after the expiry of the current retail price caps.
- **Improve roaming alerts and consumer information**, to better protect consumers from unexpected costs.
- **Ensure effective wholesale access and competition for MVNOs**, enabling them to offer competitive roaming services and deliver greater choice to consumers.

² Regulation (EU) 2022/612, <http://data.europa.eu/eli/reg/2022/612/oj>.

³ Bundesnetzagentur, Jahresbericht Telekommunikation 2025 [Annual report on Telecommunication 2025], p. 48.

III. Preserve the ‘Roam Like at Home’ principle

The current ‘Roam Like at Home’ framework remains essential and should be maintained beyond the review.

Consumers increasingly expect mobile services abroad to function in the same way as at home. The requirement that roaming services be provided with the same quality of service, where technically feasible and free of charge, must therefore be retained and effectively enforced.

Despite the current rules, a significant proportion of users continue to experience inferior service quality while roaming. This may be due to technical reasons or to unjustified differentiation. According to available evidence, 27 per cent of roaming users report slower internet connections abroad compared with their home country.⁴

The continued differences in service quality experienced by roaming users demonstrate that the requirement to provide services under equivalent conditions remains necessary. Effective monitoring and enforcement, therefore, remain essential components of the ‘Roam Like at Home’ framework.

⁴ European Commission, Eurobarometer, <https://europa.eu/eurobarometer/surveys/detail/2958>.

IV. Strengthening the roaming framework for consumers

1. Improve protection against unintended roaming

Unintended roaming remains one of the main reasons for consumer complaints regarding roaming.⁵

Particularly in border regions, consumers may unknowingly connect to networks outside the EU roaming area, for example Switzerland, and incur substantial additional charges.

BEREC and the European Commission should, therefore, assess whether additional safeguards against unintended roaming are necessary and technically possible.

2. Strengthen safeguards against non-terrestrial network charges

The increasing availability of communications services via satellites, aircraft and maritime networks creates new risks for consumers. Many consumers remain unaware that connectivity via non-terrestrial networks is generally not covered by ‘Roam Like at Home’ protections and may result in very high charges. Particularly on cruise ships near the coast, many consumers are unaware that their mobile phones may be connecting to an expensive satellite network.

BEREC and the European Commission should assess whether additional safeguards against unintended non-terrestrial network charges are necessary and technically possible.

3. Remove restrictions on unlimited data tariffs

Consumer expectations have evolved significantly since the introduction of the current fair-use framework.

Average mobile data usage continues to rise. In 2025, for example, it rose by 13 per cent compared with the previous year, reaching 8.4 GB.⁶

In Germany and many other Member States, tariffs with unlimited domestic data allowances are increasingly available. Consumers purchasing such products reasonably expect to use them throughout the European Union without facing restrictive roaming caps.

However, under the fair-use policy, providers are currently able to impose permissible restrictions based on a specific formula, even for unlimited tariffs.

The current possibility for operators to impose data limits on users of unlimited domestic tariffs should, therefore, be reconsidered. As part of the continued development of the Digital Single Market, the European Commission should work towards phasing out such restrictions.

⁵ Bundesnetzagentur, Tätigkeitsbericht Telekommunikation 2025 [Annual report on Telecommunication 2025], p. 48.

⁶ Ibid, p. 27.

4. Explore solutions for intra-EU communications

Although not formally covered by the Roaming Regulation, consumers continue to face unexpectedly high charges for international communications from their home country to another Member State.

From a consumer perspective, there is often little distinction between a call made while travelling within another Member State and a call made from the consumer's home country to another Member State. The persistence of different pricing regimes for these communications is difficult to understand and risks undermining the objective of a genuine Digital Single Market.

The Commission and BEREC should examine whether further measures are required to improve transparency and affordability of intra-EU communications after the expiry of the current retail price regulation for intra-EU calls and SMS.

5. Improve roaming alerts and consumer information

Welcome messages and information obligations are an important consumer protection tool. However, their effectiveness may be undermined if messages are excessively long or sent so frequently that consumers no longer pay attention to them.

BEREC and the European Commission should assess whether roaming alert messages can be simplified and better targeted so that consumers can quickly understand relevant charges and take appropriate action, where necessary.

6. Improve competitiveness and wholesale access for MVNOs

Effective competition remains essential for delivering consumer benefits.

Mobile Virtual Network Operators (MVNOs) play an important role in stimulating competition, innovation and price pressure in retail markets. The review should, therefore, assess whether existing wholesale roaming conditions enable MVNOs to compete on equal terms with network operators.

Any barriers that limit MVNO access to competitive roaming products should be addressed.

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