

The EU Electronic Communications Code (EECC) is an ambitious recast of the existing EU regulatory framework for the regulation of electronic communications services and networks across the EEA. The EECC has also been transposed into UK law prior to Brexit. Among other things, the EECC expands notification and registration requirements to certain types of internet and cloud-based communications services in each country in which it is applicable.

For those who do not have an in-house regulatory team in each of these countries, keeping abreast of the ongoing notification requirements and remaining compliant can be onerous.



Solution

On behalf of your company, we can manage the ongoing notification requirements set out below, required under the general authorisation regime in the EU/EEA member states. For a fixed annual fee, we include the following general reporting requirements:

- Managing and maintaining the notifications and registrations under the national laws transposing the EECC
- Calculating, diarising and facilitating the payment of the administrative charges due under the national laws transposing the EECC (the administrative charges would be paid by your company directly, if any)
- Managing the general annual service reporting obligations under the national laws transposing relevant EECC Articles
- Calculating, diarising and facilitating the payment of the contribution to the universal service funds (USF) set out under the national laws transposing the EECC (the USF contribution would be paid by your company directly, if any)

All of the other requirements applicable to electronic communications networks and services (ECN/ECS) providers under the national laws transposing the EECC would be excluded from the fixed fee.

Out of scope work includes complying with specific information requests addressed specifically to your company under Articles 20 and 21 – as opposed to general reporting requirements – aimed at checking whether your company is compliant with any of the general authorisation conditions.

We would, of course, be happy to assist your company in connection with those *ad hoc* requests from the national competent authorities, based on time spent and hourly rates, or any other alternative fee arrangement to be discussed and agreed between us in advance of performing such out of scope work.

Bonus

In addition to the above work product, we would provide your company with a trial free-of-charge licence (for the duration of three months) of our new Digital Communications Markets Access Tool (DCMAT). It is an automated tool aimed at helping the in-house legal team identify the potential licensing/authorisation requirements risks under the national communications laws of 75 countries worldwide, including the EU countries within the scope of this proposal. DCMAT would be a useful complement, not a substitute, to the outsourced solution described above.

Assumptions

Our solution is based on the assumption that your company would provide us with all necessary information to manage the ongoing notification requirements under the general authorisation regime in the in-scope countries identified above.

In the first instance, it would be useful to receive the following information: a copy of the notifications already submitted in any of the in-scope countries and a breakdown of the ECN/ECS-related revenues and users in each of the in-scope countries.

We would be happy to work with you and your team to gather this information in the most efficient and least disruptive way for the business.

Your Dedicated Team

With a dedicated and centralised EECC compliance team, we will coordinate for you, at no additional cost, local counsel in the in-scope countries. In countries where we do not have an office or subject matter experience, we will work together with one of our recommended external local counsel, if need be.

Credentials

- We have vast experience in all of the issues covered by the EECC, having actively participated in the negotiations at EU and member state levels that led to the adoption of the EECC.
- With our “one-firm firm” approach, we draw upon the skills of specialists in complementary areas such as competition, licensing, spectrum management, e-privacy, network security, consumer protection and public policy.
- Many of our team members are former senior EU and national regulators, have served in in-house leadership roles within leading global telecommunications companies, or have leadership positions within international regulatory fora, such as the International Institute of Communications.
- Through our pan-European network, we are able to provide a “one-stop shop” for meeting the challenges and opportunities arising from the EECC. We can add value by monitoring the transposition of the EECC in national laws, advising on compliance with the new EECC requirements and bringing or defending clients in regulatory proceedings related to the imposition of new, or the rolling back of existing, ex ante regulation under the EECC.
- Current clients include a global social networking platform, a US multinational technology company, a cross-platform voice-over IP and instant messaging software application, and a US cloud computing and virtualisation technology company.

This cross-practice and cross-office collaboration, combined with our industry focus, ensures we can give you the highest quality representation, with all the benefits only an influential global law firm can provide.



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“Francesco Liberatore is particularly superb – great to work with and has a real in-depth knowledge of telecoms law and practice.”

Legal 500

Read EECC-specific insights from our experts:

[The EU Electronic Communications Code Handbook](#)

[Five Minutes on the EU Electronics Communications Code](#)

[What Makes an Electronic Communications Service?](#)

[EU Electronic Communications Code – Implications for New Digital Communications](#)



“He is an excellent lawyer who is very clever, seizes the issues very quickly and provides interesting and original solutions.”

Chambers