

The Digital Networks Act

Bitkom Position Paper

At a glance

The Digital Networks Act

Initial Position

In January 2026, the European Commission published the »Proposal for a Regulation of the European Parliament and of the Council on Digital Networks, amending Regulation (EU) 2015/2120, Directive 2002/58/EC and Decision No 676/2002/EC and repealing Regulation (EU) 2018/1971, Directive (EU) 2018/1972 and Decision No 242/2012/EU (Digital Networks Act)«. It is based on the White Paper »How to Master Europe's Digital Infrastructure Needs?« from February 2024. The Digital Networks Act (DNA) as the new connectivity rulebook is intended to enable networks and digital services to scale and network operators to invest more efficiently across borders, while safeguarding core user rights and essential public-interest functions such as security and resilience.

Bitkom Rating

The DNA is a missed opportunity. While its objective of deepening the Single Market for connectivity is welcome, the draft falls short of strengthening competitiveness and improving investment conditions. Instead of delivering ambitious simplification, it adds complexity, new obligations and more reporting requirements, with over 200 articles. To unlock investment, boost growth and enhance competitiveness, the DNA should focus on genuine simplification and a clear reduction of existing reporting and transparency obligations.

The Most Important Takeaways

■ Single Market Authorisation

Bitkom welcomes the aim of facilitating operation in several Member States and cross-border scaling. A single notification must remain sufficient, with no additional documentation requested by NRAs. The new passporting regime should be clarified and streamlined. Rules need to be evidence-based, as vague provisions such as Article 9(2) risk imposing telecom obligations on private networks and non-telecom businesses.

■ Spectrum & Numbering

Bitkom calls for spectrum policy that limits excessive licence costs, provides planning certainty, clarifies transition periods and preserves a balanced division of powers between the Commission and NRAs. Revocation grounds must remain narrow. Numbering rules need national flexibility, EU coordination, and a cautious, evidence-based approach to pan-European resources.

■ Services

Bitkom supports ending outdated universal service obligations; connectivity gaps should be addressed through technology-neutral public funding, not complex mechanisms. End-user rights must be simplified, fully harmonised and limited to consumers. NI-ICS regulation needs to be proportionate and evidence-based.

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1 Introduction and General Assessment

Europe's economy and society depend on high-performance and resilient digital networks. Achieving this requires replacing today's patchwork of national rules with a genuinely EU-wide framework and delivering meaningful reductions in administrative burden. Bitkom therefore expressly welcomes the Commission's ambition to deepen the Single Market for connectivity and to modernise the legal framework. The Commission rightly recognises the need to strengthen the entrepreneurial scope for innovation, scale, and resilience in a competitive environment. We especially see merit in the proposal's intention to strengthen European spectrum policy. At the same time, however, the current draft is not ambitious enough in terms of simplification and the new objective of competitiveness. Instead, it introduces additional complexity. We welcome the intention to harmonise consumer protection rules across the EU and thereby prevent gold-plating. Yet, significant simplification potential is not leveraged.

The DNA offers a timely opportunity to improve Europe's long-term framework conditions for digital networks and an opportunity that Parliament and Council should seize. In the legislative process, they should significantly improve the proposal to ensure it delivers genuine simplification and investment certainty.

Sustainability is essential for the success of Europe's twin digital and green transition. However, it should not be turned into an additional sector-specific regulatory objective for electronic communications, as proposed in Article 3 (1g) of the DNA draft. The sector is already – and has always been – making efficiency gains through ongoing network modernisation and innovation, while at the same time enabling substantial emissions reductions across the wider economy. Operators and other ecosystem actors have strong economic and ESG-driven incentives to enhance sustainability. Efficiency gains are embedded in investment decisions and supported by technological progress across networks, cloud infrastructure, and hardware. At the same time, companies already disclose comprehensive sustainability data under the ESRS pursuant to the CSRD. These reports are based on double materiality analyses, publicly available, externally audited, and will soon be XBRL-tagged to further enhance comparability. Hence, it is not conceivable that there may be additional needs for data requests on behalf of NRAs. Articles 115 (1c) and 182 (4) should therefore be deleted.

The current draft of the DNA refers in several places to the Cybersecurity Act (CSA), which is expected to be superseded by the Cybersecurity Act 2 (CSA 2), as well as to specific requirements on the security of the ICT supply chain. Neither of these reference documents has yet been adopted. To ensure legal certainty and predictable planning, Articles 9 (4d), 20 (2d), 25 (1) and 181 (4) should instead refer to the law in force at the relevant time (e.g., »...compliance with cybersecurity rules in accordance with existing national and European regulations«).

2 Resilience (Part II)

Bitkom supports a harmonised security framework with common standards, common certification, common reporting, and notification requirements that increase resilience for the EU. Yet, there is no need for harmonisation of a security framework in the DNA, as it has already been established and harmonised, notably in NIS2 and the CRA. Duplicative or conflicting reporting and certification requirements must be avoided. Accordingly, any harmonisation measures must remain strictly within the limits of the EU's allocation of competences.

Creating a new regime with sector-specific recommendations will increase regulatory overlap, add compliance costs that divert investments away from concrete risk management measures, and create fragmentation as they are implemented by the NRAs. The DNA proposal undermines simplification objectives by creating a new reporting regime, where operators would be required to report on the network topology and architecture, capabilities, capacity, and utilization of their networks to the NRAs in each country every two years.

If the DNA goes further than the mere harmonisation of the security framework, we very much support the »secure-by-design« approach, the development of common end-to-end standards, and common technical certification schemes that underpin an open strategic autonomy approach.

Furthermore, Bitkom is fully supportive of the need for security regulation but asks that due consideration be given to ensure that the requirements are risk-based and proportionate and focus only on the areas not covered by existing legislation. The proposed DNA resilience provisions in Article 5 are largely left to be defined in the new EU Preparedness Plan, which will be unavailable until 12 months after the DNA enters into force. Nor is there any explanation of how these new provisions will operate alongside existing European resilience measures (e.g. NIS2 or the Subsea Security Toolbox) or the expected Member States' preparedness plans. This increases uncertainty for businesses and risks duplicative obligations. Resilience obligations must be technically realistic and innovation-friendly to avoid slowing down network modernisation. Proposed requirements such as uninterrupted availability in all circumstances, rigid testing and notification obligations for the implementation of new technologies, and long advance notice periods for migration away from legacy network technologies, increases the cost and risks delaying technology upgrades and the transition to more resilient next-generation networks.

We support a pro-investment approach that incentivises strong security as unpredictability hampers investment with negative impact on security, skills, and innovation. These principles should uphold material-, origin- and vendor-neutrality.

We support the fair and balanced application of regulation applied equitably across different actors operating in the same fields.

3 Single Market Authorisation and Passporting (Part III)

Bitkom welcomes that the DNA targets facilitating operation in various Member States and cross-border scaling. Operating in multiple Member States on the basis of a single notification to one national regulatory authority using a BEREC template, while national authorities are not allowed to request additional documents beyond that, is the right step. It reduces administrative friction and legal fragmentation and can lower both the cost and time needed to expand across borders. Nevertheless, market entry within the EU is already not particularly difficult today. The main barriers to establishing EU-wide services stem from divergent detailed regulatory requirements across Member States. The passporting regime must operate without prejudice to the competence of national regulatory authorities. Cross-border simplification must not become a vehicle for regulatory arbitrage. In addition, potential scale effects within individual Member States are not sufficiently enabled.

The DNA proposal for a new ‘passporting’ regime should be clarified and streamlined as regards the enforcement powers of national regulatory authorities. The current proposal tasks the NRA that has granted general authorisation with enforcing rules also in other Member States for all obligations attached to the authorisation. Such a system would harm both providers and end-users: where an NRA finds a breach of obligations on its territory, the administrative process and possible sanctions should be the same, no matter where the relevant operator has obtained its general authorisation.

Furthermore, we propose that regulations are based on actual, evidence-based needs and not on descriptive characteristics of the service.

Article 9(2)'s vague language could capture private networks across finance, healthcare, energy, and manufacturing—imposing telecom obligations (registration, fees, incident reporting, resilience requirements) on thousands of European businesses that never intended to be telecom providers.

4 Resources: Spectrum and Numbering (Part IV)

Spectrum

The high cost of acquiring spectrum licences through auctions has been a burden on the European telecommunications sector in the past. We welcome the recognition

within the DNA draft that artificially high spectrum prices cause roll-out delays and suboptimal network quality. Therefore, excessively high spectrum prices should be avoided in the future through suitable measures.

The DNA proposal contains positive elements in the area of spectrum policy, which we welcome. We believe that the envisaged reforms can make an important contribution to strengthening investment conditions and competition in the electronic communications sector.

The following structural improvements in the proposal are particularly noteworthy:

- Long-term planning certainty as the default approach.
- The aim of implementing a realistic spectrum pricing methodology through the inclusion of relevant parameters, such as 'revenue per MHz' under Article 29.
- Strengthening of the peer review process, including improved protection against disproportionately high license fees.
- Clear rules on the shared use of terrestrial spectrum by satellite services, ensuring the protection of existing networks without hindering innovation. Enshrining this principle in the DNA ensures legal certainty and clearly defines the complementary role of satellite-based services vis-à-vis terrestrial networks.

However, while the proposal introduces a number of positive changes to EU spectrum policy that reflect a sound analysis, we see a need for adjustments to unleash the full potential of the above-mentioned positive elements to enable investment and competition and to ensure the efficient use of frequencies.

Bitkom considers that the following changes and additions are key:

- Clarification on the precise meaning of the proposed transitional periods, as we understand this provision to be a key factor in determining the applicability of the DNA extension rules to spectrum licences expiring in the coming years.
- Adequate balance of powers between the European Commission and NRAs: we recognize that it can be beneficial to centralise decision-making power at the European Commission-level in some cases but it is also necessary that an adequate balance of powers between the European Commission and national regulators remains in place.
- While Bitkom recognises the need for revocation mechanisms, the grounds justifying revocation should be defined narrowly and precisely, so as to ensure that licence holders have legal certainty regarding the exact circumstances under which revocation may occur.
- Ensure that spectrum allocation decisions are based on thorough socio-economic analyses that consider all use cases and avoid approaches that would unduly favour one technology over another. For this reason, the efficient use of spectrum should always be a parameter to be considered.
- Establish a clear roadmap for increased spectrum to meet increasing capacity demands: The expected demand, traffic growth and connectivity targets of mobile networks – especially while keeping power consumption and cost levels down – cannot be met without additional low- and mid-band spectrum. This holds true

even though important measures like refarming, shared approaches and densification are pursued. The European Commission should consider these demands in the upcoming review of the 470-694 MHz band for use after 2030.

Numbering

Bitkom shares the classification of numbers as a »key electronic communications resource«, serving multiple purposes and being essential for connectivity, innovation, and market development, as well as for consumer protection and fraud prevention, in national market contexts and within the EU.

Accordingly, Bitkom supports a forward-looking framework for the management, allocation, and use of national numbering resources, on the national level and within the EU. In this context, it is necessary from our perspective to preserve the flexibility of NRAs with regard to national number management and regulation and to ensure a coordinated EU framework for the extraterritorial use of national numbering resources, where it demonstrably enables EU-wide services and cross-country market developments.

With regard to a potential EU/NRA application for pan-European numbering resources to the ITU, it is important from our perspective to apply a cautious and experience-based approach. Such EU-specific numbering resources are not per se suitable to meet market needs and to support the development of cross-country services within EU. Cross-country business models (e.g. machine-to-machine services such as connected cars, referred to in Recital 138) are usually established on a global scale. Therefore, many market participants have applied for and been allocated non-geo numbering resources directly by the ITU. These numbering resources are used for the establishment of business models and service offers across countries in the EU and outside the EU.

5 Services (Part VI)

Part VI consolidates the regulatory regime for electronic communications services, including end-user protection and service-specific obligations. Any extension of end-user protection rules must respect the different technical feasibilities between services and the principle of proportionality.

Universal Service

Due to strong competition, telecommunications services are made available to all EU citizens at affordable prices. In general, prices for telecommunications services in the EU have been decreasing over the years, and with a huge variety of offers, consumers have the choice to select offers according to their needs. Thus, competition has created

an environment where almost all end-users have access to affordable broadband services. The decreasing uptake of discounted offers targeting low-income consumers demonstrates that the instrument for affordability is no longer needed. In practice, it is also frequently observed that particularly wealthy citizens invoke the universal service obligation.

Accordingly, since the implementation of provisions on the Universal Service Obligation, the market for electronic communications services to consumers has evolved significantly. Today's markets feature a huge variety of offers that match the needs of consumers and ensure sufficiently wide broadband connectivity to ensure social and economic participation in society. The availability of adequate broadband has become nearly universal across the EU, with 97.7 percent of households having fixed broadband coverage. There is no longer any need for the provisions on availability.

However, if connectivity gaps are still identified in exceptional cases, these cases should primarily be addressed through national measures and targeted public funding using a technology-neutral approach (esp. recognising new technologies such as advanced technologies) rather than a complex legislative mechanism like the USO in order to avoid unnecessary administrative effort and to create only short-term and geographically isolated solutions. Citizens with special social needs or low income are best supported by the public welfare system, which is already the case in most Member States.

Nevertheless, if the universal service regime is to be maintained, it is particularly important when determining the bandwidth of a universal service connection that a technology-neutral provision should still be possible so that expansion and planning capacities do not have to be taken away from private FTTH deployment. Otherwise, there would be a risk of expansion to individual households, which would be at the expense of FTTH coverage in already planned areas. Advanced technologies like 5G Fixed Wireless Access and Low Earth Orbit satellites have long been capable of preventing social exclusion. Therefore, the relevance of universal service is likely to further decline. Because of the public service character of the universal service, public funding should be emphasized to cover the costs of bandwidths under the Universal Service regime.

End-User-Rights

The revision of the EECR should aim to simplify and fully harmonise the existing rules; the current draft still contains many exceptions enabling national gold-plating. There should be no further national gold plating that would lead to divergences across Europe and a patchwork of rules hindering a competitive single market for telecoms. The leitmotif should be: as much consumer protection as necessary, as little as possible. The DNA should only maintain end-user rights that are actually justified and really have an effect (effect-based approach). Unnecessary end-user rights without added value should be deleted from the DNA (functional approach).

While substantial rights such as number portability and provider switching are necessary and useful, we propose to remove outdated and unjustified rules as well as rules overlapping with existing horizontal legislation. This applies, for example, to

duplicative and extensive information obligations, such as mandatory contract information, causing an information overload, thus not leading to the intended informational benefits. Other requirements, for example regarding the quality to be provided, often do not consider technical feasibility. It is technically impossible for service providers to agree on verifiable bandwidth values in the individual contract if these bandwidths can be checked in practice at any time and from any location using the NRA's measurement tool.

Lastly, we do not consider today's consumer-related provisions of the EECR suitable for the B2B market. Remaining provisions under the DNA should therefore not apply to undertakings regardless of their size. We propose a return to consumer protection that protects real consumers.

Article 97 provides an EU-wide anchor for contract design. We can support the principle that maximum commitment periods for electronic communications services should not exceed 24 months, because it strengthens customer confidence and creates a more predictable and harmonised baseline across Member States.

At the same time, Article 97 is not helpful although it recognises the operational realities of fibre deployment. It allows certain separate arrangements related to the mere establishment of the physical connection (e.g. instalment or repayment model) distinct from the service contract, provided these do not undermine switching rights. However, this approach is not working in market reality and has failed to overcome the obstacles to network deployment. Thus, the DNA framework needs a new approach that enables rollout planning and investment security without turning pre-deployment periods into extended service lock-in.

Further, Article 97 includes a well-intentioned exception for the construction of physical infrastructure. Unfortunately, this provision is not practical because, firstly, it does not fit the general regulatory framework for wholesale services, and secondly, such instalment payment contracts simply do not reflect market practice. Consumers do not want to enter into multiple contracts for a single connection. Therefore, it is necessary to adapt the regulations governing contract durations for cases involving the physical construction of a connection.

Against this background, the Bundesgerichtshof (Federal German Court of Justice) decision of 8 January 2026 (III ZR 8/25) risks narrowing rollout-friendly contracting models by treating the time between contract conclusion and activation as part of the binding period in a way that can make early customer commitments commercially unattractive, even where the service commitment itself would still respect the 24-month cap.

Therefore, we would welcome clarification in the DNA that the 24 months only begin from the point at which the connection is made available, even if the contract was concluded earlier.

With regard to the processes for switching providers, porting phone numbers, and fraud prevention, it is important that a uniform, Europe-wide framework is established at the EU level and fully harmonised. At the same time, however, member states must retain some flexibility to coordinate their processes and systems nationally in order to comply with the framework avoiding unnecessary costs associated with nitty-gritty regulations.

In addition, there should be full harmonisation regarding contract durations of 24 months, and there is no need for national general provisions to ensure a European Single Market.

Number-Independent Interpersonal Communications Services (NI-ICS)

Any regulatory approach to NI-ICS, such as messaging applications, must be proportionate and evidence-based.

Where specific measures are considered, policymakers must recognise that mandating equivalent capabilities for NI-ICS raises significant technical feasibility challenges that require careful assessment before any obligations are imposed.

6 Governance (Part VII)

The DNA creates a new EU agency, the Office for Digital Networks (ODN), with extensive tasks including analytical support for BEREC and the Radio Spectrum Policy Body, market monitoring, and resilience planning. It has not been adequately demonstrated which specific market problems or regulatory deficits the new agency would address that cannot be handled by existing structures (BEREC, NRAs, Commission services).

Before establishing the ODN, the legislator should demonstrate concrete, measurable improvements for competition and consumers that cannot be achieved through existing mechanisms. Less institution-intensive alternatives, such as strengthening existing BEREC mechanisms, should be examined first.

More broadly, the shift of competence to the EU level through expanded Commission veto rights risks constraining the ability of national regulators to act swiftly and in market-appropriate ways. The balance between centralised harmonisation and national regulatory expertise must be carefully preserved.

7 General and Final Provisions (Part VIII)

Reporting Requirements

Contrary to the EU Commission's stated goal of reducing reporting requirements by up to 50 percent (cf. Call for Evidence, Digital Networks Act, 2025), the DNA introduces additional reporting requirements, such as new specifications in the areas of resilience, sustainability, network availability, and network deployment forecasts. Any DNA rules regarding the provision of information or data by undertakings in the context of information requests or surveys conducted by NRAs must contribute to reducing bureaucracy for undertakings, rather than increasing it.

Telcos and the broader internet economy are currently subject to a significant number of reporting and transparency obligations (e.g. regarding network coverage, roaming services, sustainability KPIs). A simplification and reduction of transparency obligations and information requests is necessary instead of the increase foreseen in the DNA, in particular in Article 183 regarding network deployment forecast, and in Article 115 regarding sustainability KPIs. Wherever information requests are still deemed necessary, they should be limited to an essential scope and targeted towards a limited set of specific objectives (e.g. monitoring national broadband targets).

Sustainability Reporting

Sustainability is an integral part of Europe's digital and green transition. The electronic communications sector plays a dual role in this context: it continuously improves the energy and resource efficiency of its own networks through technological innovation and modernisation, while simultaneously enabling substantial emissions reductions across the wider economy. Digital connectivity underpins efficiency gains in industry, mobility, agriculture, public administration, and energy systems. For network operators and other ecosystem actors, sustainability improvements are not primarily regulatory driven but economically inherent. Energy efficiency reduces operational expenditure, strengthens resilience against volatile energy prices, and aligns with capital market expectations shaped by ESG criteria. Investment decisions in network modernisation, cloud infrastructure, advanced wireless technologies, energy-efficient chipsets, and improved coding are increasingly guided by both environmental and economic considerations.

Against this background, introducing additional sector-specific sustainability objectives or reporting obligations under the DNA would neither close a regulatory gap nor create additional environmental benefits. Companies are already subject to comprehensive sustainability reporting under the Corporate Sustainability Reporting Directive (CSRD) and the European Sustainability Reporting Standards (ESRS). These frameworks are based on a double materiality assessment, ensuring that both environmental impact and stakeholder relevance are systematically covered. Reports are publicly available,

externally audited, and designed to ensure transparency and comparability across sectors and Member States. The upcoming XBRL tagging will further enhance usability for investors and regulators. In addition, the European Commission published a Code of Conduct for the Sustainability of Telecommunications Networks with harmonised KPIs applicable EU-wide only in January 2026. Any parallel or additional reporting requirements at the national regulatory authority (NRA) level would undermine the once-only principle and contradict the EU's broader simplification agenda, including the objectives of the omnibus package. Diverging or heterogeneous national requirements would create inconsistencies within multinational corporate structures, increase compliance costs and risk distortions in capital market assessments. Rather than enhancing transparency, such fragmentation could reduce comparability and weaken investor confidence in sustainability benchmarks. For these reasons, Article 115, which foresees additional sustainability reporting obligations vis-à-vis NRAs, as well as Article 182(4), which empowers BEREC to require further sustainability data collection, should be deleted. The existing horizontal sustainability framework under CSRD and ESRS is sufficient and should not be complemented by sector-specific parallel regimes.

Data Protection

In the area of data protection, too, the DNA misses the opportunity to eliminate overlapping rules and existing asymmetries. Instead of repealing the 23-year-old ePrivacy Directive and regulating core principles such as the confidentiality of communications horizontally in the GDPR, most regulations remain applicable. As a result, the telecommunications sector continues to be subject to significantly stricter requirements for the processing of location data than large parts of the digital economy, which can use comparable data much more flexibly under the GDPR framework—a completely outdated regulatory asymmetry in the age of digital communication.

8 Additional Demands

Bitkom considers that the following aspects should also be considered:

Coexistence and Coordination of Rooftop Solar Panels and Mobile Network-Based Connectivity

While we fully support the EU climate targets, and efforts to reduce greenhouse gas emissions and to expand renewable energies, we would like to emphasise that these endeavours must not compromise the Digital Decade targets. There is a risk that the new Energy Performance of Buildings Directive (EPBD), which stipulates the

installation of photovoltaic systems on buildings, might impact on the already limited availability of roof space, e.g. for 5G infrastructure.

The use of rooftop sites is essential for 5G roll-out and densification in urban areas. However, due to the requirements of the EPBD, there is a risk that solar installations and 5G roof masts will compete for suitable roof space. In the long term, this could hamper the roll-out and efficiency of 5G networks. In Member States where photovoltaic obligations have already been introduced, this has already led to landlords being quite hesitant when it comes to concluding and renewing contracts with TowerCos.

We would like to encourage the European Commission to investigate strategies for the coexistence and better coordination of rooftop solar energy installations with 5G network infrastructure. This could include exceptions for landlords regarding photovoltaic systems if they already provide their rooftop space for 5G infrastructure or plan to do so. The implementation of the EPBD must not hamper the roll-out of 5G networks. Instead, possible synergies between digital and energy policy objectives should be explored and promoted.

Prioritised Access to the Low-Voltage Power Grid for Cell Towers

5G Connectivity is a key component of the EU's digital competitiveness as well as essential for meeting the EU's Digital Decade target of ensuring 5G coverage in all populated areas. However, a remaining key obstacle to efficient mobile network expansion is the persistent delay in connecting mobile communications sites to the low-voltage power grid. As a consequence, many regions still face coverage gaps where 5G is either inadequate or entirely missing. Eliminating the digital gap in these underserved areas, especially in rural regions and along key transport routes, requires faster and more reliable access to the low-voltage power grid.

To allow for a timely connection to the power grid, mobile network sites should be given priority in grid connection procedures, as is currently the case in the draft bill to amend the German Telecommunications Act. In addition, clear deadlines should apply to both the preparation of offers and the timely implementation of connections by distribution network operators (DNOs). Greater transparency on both costs and grid routes is also required. Concession areas should be opened up to allow neighboring DNOs to compete where they can provide a more cost-efficient connection. Better, streamlined communication, e.g. through standardized processes, single points of contact, or the establishment of dedicated communication channels would contribute to faster processes.

Bitkom represents more than 2,300 companies from the digital economy. They generate an annual turnover of 200 billion euros in Germany and employ more than 2 million people. Among the members are 1,000 small and medium-sized businesses, over 700 start-ups and almost all global players. These companies provide services in software, IT, telecommunications or the internet, produce hardware and consumer electronics, work in digital media, create content, operate platforms or are in other ways affiliated with the digital economy. 82 percent of the members' headquarters are in Germany, 8 percent in the rest of the EU and 7 percent in the US. 3 percent are from other regions of the world. Bitkom promotes and drives the digital transformation of the German economy and advocates for citizens to participate in and benefit from digitalisation. At the heart of Bitkom's concerns are ensuring a strong European digital policy and a fully integrated digital single market, as well as making Germany a key driver of digital change in Europe and the world.

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