Dear Anthony, Vesa and Ramunas,

on behalf of Italian MVNO CoopVoce, I am taking the liberty to draft and submit to you some amendments to the draft Single Market Regulation, with specific reference to the articles modifying Regulation 531/2012 on international roaming. The scope of our proposal is to make sure that mobile alliances remain open and competitive, also vis-à-vis MVNOs. MVNO should be entitled to take part to them, directly or by way of the arrangements agreed by respective hosts.

Here CoopVoce's amendments (in bold):

Recital 62:

Roaming alliances can allow a mobile operator to treat roaming by its domestic customers on the networks of alliance partners as being to a significant degree equivalent to providing services to such customers on its own networks, with consequential effects on its retail pricing for such virtual on-net coverage across the EU. Such an arrangement at the wholesale level could allow the development of new roaming products and therefore increase choice and competition at retail level. **Mobile virtual operators should not be excluded from such alliances and, in addition, should be entitled to benefit, without discriminations, of the terms agreed by their host operator with the respective alliance;** 

Article 33 – Amendments to Regulation No 531/2012/EU

.....

3. A new Article 4a is introduced:

"Article 4a

1. The members of a roaming alliance shall benefit from the provisions of this Article when the alliance has members in all Member States and when alliance members apply, by default and in all retail packages that include regulated roaming services, the applicable domestic service rate to both domestic services and regulated roaming services, as if the latter were consumed on the home network.

Mobile virtual operators should not be excluded from such alliances and, in addition, should be entitled to benefit, without discriminations, of the terms agreed by their host operator with the respective alliance

I remain at your disposal for further information.

Kind regards,

**Cabinet Sprl** 1050 Bruxelles – Belgium

Tel.:	+32
Skype	
Twitter	
Email:	
my blog	g: http://
my mu	sic: