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Review of the Digital Decade Policy Programme – Call for Evidence

Strengthening the Role of Wi-Fi and Indoor Connectivity in Achieving Europe's 2030 Digital Objectives

December 22, 2025

European Commission
Directorate-General for Communications Networks, Content and Technology
(DG CONNECT)

Reference: Public Consultation – Review of the Digital Decade Policy Programme
Respondents: Dynamic Spectrum Alliance, DSA

Dear Commission Services,

The Dynamic Spectrum Alliance ("DSA") welcomes the opportunity to contribute to the Commission's review of the Digital Decade Policy Programme (DDPP)

The DSA is a global, cross-industry, not for profit organization advocating for laws, regulations, and economic best practices that will lead to more efficient utilization of spectrum and foster innovation and affordable connectivity for all. We advocate for policies that promote unlicensed and dynamic access to spectrum to unleash economic growth and innovation. Additionally, we advocate for a variety of technologies that allow dynamic access to spectrum.

We strongly support the Commission's continued efforts to ensure that the DDPP remains forward-looking, technology-neutral, and responsive to Europe's evolving connectivity, digitalisation, sustainability, and competitiveness needs. Our organisations are deeply committed to advancing high-quality digital connectivity, innovation in Europe's digital ecosystem, and the effective implementation of Europe's 2030 digital targets.

This response focuses on one area where we believe the DDPP review offers a major opportunity for refinement: the role of Wi-Fi and indoor connectivity in achieving gigabit usability, SME and public-sector digitalisation, and sustainable high-capacity networks across the Union. We provide recommended adjustments to indicators, governance mechanisms and monitoring approaches that would allow the DDPP to more accurately reflect how Europeans connect today and how connectivity will evolve towards 2030.

We remain available to engage further, provide additional information, and participate in follow-up discussions as the Commission advances this important review.

Best regards,

Dr. Martha Suarez
President, Dynamic Spectrum Alliance

1. Feedback on the current DDPP objectives and targets – and the relevance of Wi-Fi

We welcome the Commission's decision to review the Digital Decade Policy Programme (DDPP) to ensure that its 2030 objectives remain aligned with technological, economic and societal trends since 2022.

We strongly support DDPP's technology-neutral goals, including:

- Gigabit connectivity for all households
- Next-generation wireless high-speed connectivity in all populated areas
- Widespread adoption of Very High-Capacity Networks (VHCN)
- Increased digitalisation across SMEs and public services

However, in implementation practice, the DDPP connectivity pillar is today framed almost entirely around access networks, in particular fibre to the premises and 5G/6G wide-area networks, while the technologies that actually enable Europeans to connect, i.e., Wi-Fi and indoor/local networks, remain largely invisible in targets, KPIs and reporting.

Why this gap matters

Across Europe:

- The vast majority of Internet traffic is delivered over fixed networks, not mobile networks.
- Inside buildings, Wi-Fi carries around 80–90% of all data traffic, accounting for most gigabit usage at home and at work (as documented in multiple national regulator and industry reports).
- Citizens experience "gigabit connectivity" through Wi-Fi, not directly through outdoor mobile networks.
- Digital public services (schools, universities, hospitals, public administration) rely overwhelmingly on secure, high-performance indoor Wi-Fi.
- SMEs and industrial sites frequently depend on Wi-Fi 6/6E/7 for automation, cloud connectivity, logistics, and robotics.
- From an environmental perspective, the combination of indoor Wi-Fi and fibre-to-the-home (FTTH) is among the most energy-efficient methods of high-capacity connectivity, significantly more efficient than outdoor-to-indoor mobile solutions.

Despite its essential role, Wi-Fi is not explicitly recognised in DDPP's indicators or governance structures. This creates:

- A disconnect between policy targets and user experience / needs
- Blind spots in monitoring progress toward gigabit usability
- Under-investment in the indoor connectivity needed to realise the benefits of fibre
- Reduced ability to assess sustainability impacts, where access-network choice is decisive

We are not proposing new headline targets. Rather, we encourage the Commission to interpret and monitor the existing 2030 connectivity goals in a way that:

1. Reflects how Europeans actually connect, particularly indoors;
2. Ensures Wi-Fi and indoor networks are part of the "network-of-networks" needed to meet DDPP's ambitions;
3. Structures indicators and governance so that indoor gigabit readiness becomes visible and measurable.

2. Proposed indicators and targets to systematically include Wi-Fi

As the Call for Evidence invites proposals for adjusted and "future-proof" KPIs, we recommend adding a small number of supporting indicators (i.e., not new headline goals) that ensure the DDPP captures end-user gigabit experience indoors and the innovation and sustainability potential of licence-exempt spectrum.

These indicators can be integrated into the existing State of the Digital Decade reporting cycle with minimal additional burden.

A. Indoor Gigabit Readiness and User Experience

A1. Percentage of households equipped with Wi-Fi 6/6E/7 capable of gigabit performance

This complements the existing "gigabit to the premises" KPI by monitoring the last-metre segment where usability is determined.

A2. Proportion of households where Wi-Fi delivers speeds ≥1 Gb/s

This mirrors proposals made in earlier Commission consultations, ensuring that VHCN performance is usable at the device, not only at the termination point.

Specifically, median indoor Wi-Fi throughput and latency measurements for households across Member States.

A3. Availability of high-quality Wi-Fi in public buildings

E.g. schools, hospitals, libraries, public administration. This supports DDPP goals on digital public services, inclusion, and education.

B. Spectrum and Innovation Ecosystem Indicators

B1. Availability of licence-exempt access to the Upper 6 GHz spectrum across Member States

This ensures Wi-Fi 6E/7 can deliver gigabit capabilities consistently across Europe.

B2. Regulatory readiness for advanced Wi-Fi and local connectivity

Qualitative tracking of frameworks such as:

- Low-power indoor conditions
- Very-low power conditions
- Conditions supportive of enterprise/industrial Wi-Fi deployments
- Standard power with automated frequency coordination

This aligns with DDPP's innovation and competitiveness objectives.

C. SME and Industrial Connectivity Indicators

C1. Percentage of SMEs using Wi-Fi 6/6E/7 in core digital processes

Aligned with the DDPP SME digitalisation pillar. Processes may include POS systems, automation, cloud connectivity, robotics, etc.

C2. Number of industrial campuses deploying advanced Wi-Fi for Industry 4.0

Captures innovation pathways beyond cellular networks alone.

C3. Proportion of SMEs where Wi-Fi delivers speeds ≥1 Gb/s and latency below 20 ms (with best-case below 10 ms)

Captures innovation pathways beyond cellular networks alone.

D. Security, Resilience and Sustainability Indicators

D1. Adoption of modern Wi-Fi security (WPA3 and successors) in public and enterprise environments

Supports the DDPP cyber-resilience pillar.

D2. Energy efficiency of indoor connectivity (kWh/GB)

Recent studies show indoor Wi-Fi over fibre delivers connectivity with significantly lower energy intensity than indoor macro coverage or dense small-cell deployments.

Tracking this would directly support the DDPP's sustainability dimension.

3. Recommendations on governance, funding and monitoring

The Call for Evidence also invites views on stakeholder involvement, simplification, and alignment of funding and monitoring.

A. Governance and stakeholder representation

Issue:

Existing DDPP governance structures primarily involve NRAs and telecom operators, meaning key stakeholders in indoor and local connectivity (such as device manufacturers, chipset makers, Wi-Fi equipment vendors, enterprise WLAN providers, public-building operators) are not formally represented.

Recommendation:

Establish a Structured Stakeholder Panel on Indoor and Local Connectivity, which would:

- Provide expert input on indoor connectivity indicators, such as
  - Wi-Fi industry bodies
  - Enterprise network providers
  - Consumer organisations
  - Public sector digital service operators
  - Academia and R&D institutions
- Share data on Wi-Fi adoption, performance and security

- Advise on spectrum and device policy interactions
- Support assessment of connectivity in schools, hospitals, SMEs and public venues

This Panel can be a lightweight advisory mechanism, aligned with DDPP simplification goals.

B. Funding alignment

Issue:

EU programmes have rightly supported fibre and 5G deployment, but in-building gigabit readiness is often not explicitly eligible even though it determines real-world usability.

Recommendation:

Ensure that upcoming funding instruments (e.g., MFF 2028–2034, Competitiveness Fund) explicitly support:

- Wi-Fi 6/6E/7 upgrades in public buildings (schools, hospitals, clinics, libraries, cultural institutions)
- Enterprise Wi-Fi modernisation in SMEs (POS systems, cloud adoption, robotics, cybersecurity)
- Indoor connectivity for essential services (e-Health, e-Education, public safety)

This approach remains fully technology-neutral but ensures that gigabit access translates into gigabit experience.

C. Monitoring and reporting

Issue:

Current reporting focuses on 5G coverage and fibre deployment, but not on the performance of networks users actually use indoors, where nearly all digital interactions occur.

Recommendation:

Integrate Wi-Fi indicators into:

- The annual State of the Digital Decade reports
- Member States' strategic roadmaps and national progress reports

Most data can be sourced from surveys, market monitoring, device industry statistics, and existing NRA analyses, minimising burden.

D. Policy coherence

Issue:

Wi-Fi and indoor connectivity are impacted by multiple policy processes such as DDPP, RSPP, spectrum decisions, cybersecurity, the Gigabit Infrastructure Act, and sustainability work. Yet these are not always aligned.

Recommendation:

Ensure coherence by:

- Recognising indoor connectivity within DDPP monitoring
- Considering Wi-Fi device security under CRA in DDPP cyber KPIs
- Linking connectivity KPIs to network energy-efficiency metrics

This ensures that the DDPP remains consistent with Europe's broader digital and climate ambitions.

4. Summary of Key Points

- Indoor connectivity is where Europeans actually experience gigabit performance, yet DDPP indicators currently overlook it.
- Adding a limited set of supporting indicators focused on Wi-Fi capability, indoor gigabit readiness, public-building connectivity, security and energy efficiency would make DDPP monitoring more accurate and user-centred.
- Governance enhancements and funding alignment would help ensure that investments in fibre and 5G are matched by investment in last-metre / local connectivity, delivering real societal value.
- This approach is fully consistent with DDPP's technology neutrality and its emphasis on usability, inclusion, innovation and sustainability.

The Dynamic Spectrum Alliance stand ready to work with the Commission and Member States to support the Digital Decade review and ensure that Europe builds the most effective, secure, and sustainable connectivity ecosystem for 2030 and beyond.