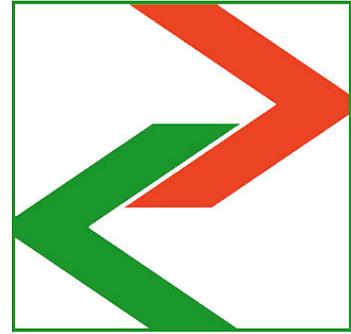


Arbeitsgemeinschaft Europäischer Grenzregionen (AGEG)
Asociación de Regiones Fronterizas Europeas (ARFE)
Association des régions frontalières européennes (ARFE)
Association of European Border Regions (AEBR)
Comunità di lavoro delle regioni europee di confine (AGEG)
Europæiske grænseregioners Arbejdsfællesskab (AGEG)
Werkgemeinschaft van Europese grensgebieden (WVEG)
Associação das Regiões Fronteiriças Europeias (ARFE)
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DG Information Society & Media
European Commission
Brussels
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**Subject: public consultation on a review of the
functioning of the European Roaming Regulation
(Regulation (EC) No 544/2009)**

Gronau, 11th February 2011

Dear Madam, Sir,

It is with the utmost appreciation that I have taken notice of the consultation you have published as a prelude to the review of the EU Roaming Regulation later this year.

The Association for European Border Regions (AEBR) is particularly interested in question fifteen of this consultation: *To what extent is the problem of inadvertent roaming still a concern for citizen's living close to borders? What measures could be taken to avoid the adverse effects of inadvertent roaming, whether by means of voluntary co-operation between operators or by means of regulatory or legislative action?*

The problem of inadvertent roaming charges occurs on a large scale in border regions, which results in many citizens facing unnecessarily high phone bills. If a signal is not sufficiently strong, a cell phone will switch automatically to a more powerful network. In border regions it often happens that this network is foreign, in which case a customer pays for roaming. Exact figures are unfortunately unknown to us. We would therefore advocate for the organization of a consumer survey on this matter, due to the potentially very high number of users facing this problem in many European border regions (more than one third of European population).

To solve the inadvertent roaming we suggest creating a transitional zone in border areas, where consumers pay a standard rate independent of the nationality of the network. These zones should be as broad as 10 kilometers on both sides of the borders and would provide not only a normalization of phone conversations, but also the transfer of data, Internet communications, etc., very much affected by this circumstance.

Similarly, operators may be obliged to provide a sufficiently powerful signal in areas where coverage is weak by adding additional antennas. Also, operators could provide their customers with better information on how to avoid inadvertent roaming charges.

A second problem, which citizens in border regions face, has to do with the accessibility of the emergency call centers. If a phone switches to a foreign network, calls will also be diverted to an emergency call center in the respective Member State. Luckily, in some border regions the control rooms cooperate very well. It will connect a caller with an officer that could help him in his own language in order not to lose time. However, this is not always the case, which might result in unpleasant and even life-threatening situations.

I hope you will carefully consider these arguments while revising the functioning of the European Roaming Regulation.

Yours sincerely,



Martín Guillermo Ramírez
Secretary General