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Position Paper on the Digital Network Act

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PSCE'S POLICY POSITION ON DNA

02/07/2026

https://digital-strategy.ec.europa.eu/en/library/proposal-regulation-digital-networks-act-dna

Introduction

Public Safety Communication Europe (PSCE) endorses **the European Commission's proposal for a Digital Networks Act**. PSCE supports the ambition to modernise the EU connectivity framework, simplify fragmented rules and create conditions that foster investment, innovation, resilience and a stronger Single Market.

PSCE particularly welcomes the fact that the **DNA goes beyond purely economic considerations and recognises that digital networks are now critical infrastructure for society**. For public safety, connectivity is not only a matter of speed or coverage. It is a prerequisite for reliable emergency communications, public warning, crisis coordination, cross-border cooperation and operational continuity in the most demanding situations.

PSCE reminds that the DNA is an opportunity **to ensure that Europe's future connectivity framework is fit for purpose in a world shaped by fibre deployment, 5G evolution, cloud and edge integration, satellite connectivity, AI-enabled services and increasing resilience challenges.** PSCE therefore supports a regulation-based approach that reduces fragmentation and strengthens legal certainty, while preserving the level of protection needed for citizens and essential services.

PSCE is happy to see the **close link between the Digital Networks Act and the future European Critical Communication System (EUCCS).** The DNA will provide an important foundation for EUCCS by strengthening resilient and secure connectivity, spectrum coordination, satellite integration and cross-border interoperability for mission-critical and emergency communications. **PSCE is already actively engaged on these topics through its work on public safety and critical communications at European level.**

PSCE key messages on the proposal

1. Resilience and preparedness (Part II)

The inclusion of a dedicated resilience framework in Part II is a major step forward for European critical communications. They are now essential infrastructure for crisis response, emergency communications and public warning systems.

The DNA should therefore ensure:

- continuity of emergency communications during crises or major disruptions;
- stronger coordination and preparedness mechanisms at EU level;
- integration of public safety requirements into resilience planning and implementation.

Public safety authorities increasingly rely on highly available and secure communications infrastructure, including during cyber incidents, natural disasters and cross-border emergencies. Public Safety and Disaster Relief (PPDR) communications should be recognised as mission-critical services afforded appropriate regulatory safeguards. The implementation of the DNA should ensure that Member States can establish and maintain dedicated governance, security and operational requirements for PPDR communications infrastructures.

2. Satellite connectivity and non-terrestrial networks (Part IV)

The recognition of satellite and non-terrestrial connectivity as strategic assets is particularly important for the public safety community. Satellite capabilities can now strengthen continuity of operations when terrestrial infrastructure is unavailable, congested or damaged.

The DNA should therefore support:

- harmonised satellite authorisation frameworks;
- resilient satellite spectrum management;
- stronger integration between terrestrial and non-terrestrial networks

3. Transition to fibre and network modernisation (Part V)

PSCE supports the transition from legacy infrastructure to fibre and next-generation networks. However, copper switch-off and network migration must be carried out in a manner that safeguards continuity, interoperability and operational reliability for emergency services and Public Safety Answering Points (PSAPs). Migration processes should include

adequate testing, prevent coverage gaps and ensure reliable service availability, particularly in rural, remote and border areas

Technology transitions should therefore:

- ensure continuity and interoperability for public safety users and Public Safety Answering Points (PSAPs);
- include sufficient testing and operational validation before legacy systems are retired;
- avoid creating coverage gaps in rural, remote, border or disaster-prone areas;
- maintain high levels of service reliability during and after migration.

Migration processes should also ensure that mission-critical communication services maintain guaranteed priority, quality of service and operational continuity throughout the transition period.

4. Spectrum policy and governance (Part IV and Part VII)

The DNA rightly recognises spectrum as a strategic resource for competitiveness, resilience and security. With a Stronger EU coordination, greater predictability and improved cross-border interoperability are necessary to support future 5G, 6G and mission-critical communication services.

At the same time, spectrum policy should not be driven solely by commercial considerations. Public safety communications and societal resilience must remain core public-interest objectives within future spectrum governance.

We support:

- stronger coordination of spectrum policy at EU level;
- more predictable and harmonised spectrum management approaches;
- mechanisms supporting cross-border interoperability and efficient use of spectrum;
- strategic planning for future wireless connectivity, including 5G, 6G and mission-critical services;
- ensuring public safety and disaster relief communications have access to adequate spectrum resources, including dedicated spectrum where operational requirements justify it; and
- spectrum governance should that mission-critical communications requirements are fully considered alongside commercial objectives.

5. End-user protection and emergency communications (Part VI)

The DNA maintains important protections related to emergency communications, public warning systems and accessibility. The simplification of the regulatory framework should not weaken reliability, accessibility or user trust in emergency-related services. Finaly, accessible and reliable communications remain essential for citizens, emergency responders and vulnerable users in both normal and crisis situations.

We support the maintenance and modernisation of:

- emergency communications obligations;
- public warning systems;
- safeguards for end-users with disabilities; and
- measures to combat fraudulent communications activities.

The DNA should distinguish clearly between emergency communications services for citizens and the mission-critical communication infrastructures used by public safety authorities, both of which require appropriate levels of protection and resilience measures.

Conclusion

Overall, PSCE supports the direction and objectives of the Digital Networks Act and welcomes the Commission's ambition to modernise Europe's connectivity framework.

The proposal represents an important step towards a more resilient, secure and integrated European digital infrastructure ecosystem. PSCE particularly welcomes the stronger focus on resilience, preparedness, emergency communications, public warning systems, spectrum coordination and secure satellite connectivity.

As the legislative process moves forward, PSCE encourages the European institutions to ensure that public safety and mission-critical communication requirements remain fully embedded throughout the implementation of the Regulation. A successful Digital Networks Act should not only strengthen Europe's competitiveness and investment capacity; it should also ensure that European citizens, emergency services and public authorities can rely on secure and resilient communications in all circumstances.