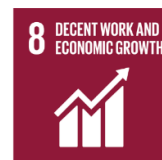




**Chambers
Ireland**
Advancing business together



Submission on the Digital Networks Act Proposal

August 2026

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About Chambers Ireland

Chambers Ireland is an all-island business organisation with a unique geographical reach. Our members are the Chambers of Commerce in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support sustainable cities and communities.

Key Points

- Align implementation of the Digital Networks Act (DNA) with the Gigabit Infrastructure Act (GIA) to ensure a coherent and streamlined framework for digital infrastructure deployment.
- Streamline permitting, wayleave and road-opening processes through standardised procedures, clear timelines and efficient dispute resolution mechanisms.
- Improve access to existing infrastructure such as ducts, poles and masts to reduce deployment costs and accelerate network rollout, particularly in regional and rural areas.
- Strengthen coordination between telecoms operators, utilities, local authorities and transport bodies, including wider adoption of "dig once" principles.
- Support the Single Passport framework while maintaining appropriate national powers in areas such as cybersecurity, network resilience, fraud prevention and service quality.
- Apply an SME test to new regulatory obligations and ensure that implementation requirements remain proportionate and practical for smaller businesses.
- Support the transition from copper to fibre networks through clear notice periods, dedicated business supports and measures to minimise service disruption.
- Provide long-term spectrum certainty to encourage investment in 5G and future 6G networks, particularly in regions where connectivity supports economic activity.
- Ensure regulatory reforms continue to support affordable, high-quality and competitive connectivity for businesses.
- Develop a National Digital Network Resilience Plan and align new resilience requirements with existing regulatory obligations to avoid duplication.

Executive Summary

The case for the Digital Networks Act is reinforced by the Letta¹, Draghi² and Niinistö³ reports and by the European Commission's Competitiveness Compass for the EU⁴. Together, these identify continued fragmentation in the EU electronic communications market. Operators seeking to provide cross-border services face differing national regulatory requirements, authorisation regimes and compliance obligations, increasing costs, discouraging investment and slowing the deployment of new technologies. The Digital Networks Act offers an opportunity to reduce these barriers through greater harmonisation and a more integrated Digital Single Market.

However, practical barriers to digitalisation remain, and several deployment issues raised in the current consultation also arise under the Gigabit Infrastructure Act. The Department's response to the DNA should therefore be aligned with GIA implementation and give businesses and network operators one coherent delivery system rather than overlapping processes.

The proposal therefore presents an opportunity to accelerate infrastructure deployment, strengthen network resilience and ensure that the State's digital connectivity keeps pace with comparable economies, while keeping implementation proportionate for SMEs and smaller operators.

¹ <https://www.consilium.europa.eu/media/ny3j24sm/much-more-than-a-market-report-by-enrico-letta.pdf>

² https://commission.europa.eu/topics/competitiveness/draghi-report_en

³ https://commission.europa.eu/topics/defence/safer-together-path-towards-fully-prepared-union_en

⁴ https://commission.europa.eu/topics/competitiveness/competitiveness-compass_en

Our Perspective

Digital connectivity is fundamental to the competitiveness of businesses in all regions of the State. Locations with strong connectivity are better placed to attract investment and support business growth⁵. Reliable, high-capacity networks support productivity, innovation, investment and access to markets, while enabling businesses to adopt emerging technologies and compete effectively in the markets they trade in.

This is particularly important as businesses adopt AI, automation, cloud services and other data-intensive technologies. Advanced manufacturing, for example, increasingly depends on connected systems, real-time monitoring and digital processes that require resilient and high-capacity networks.

Improved connectivity also supports regional development by enabling businesses outside major urban centres to access customers, attract talent and participate in wider supply chains. Digital infrastructure should therefore be recognised as an important enabler of our long-term economic development and competitiveness.

More broadly, Ireland has made significant progress in advancing its digital infrastructure through the National Broadband Plan, investment in commercial fibre and the rollout of 5G services⁶. These were essential in enabling the rapid transition to remote working during the Covid-19 pandemic and serve as a reminder of the importance of investing in infrastructure that can support businesses and communities in responding to future unexpected challenges.

The European Commission's proposed Digital Networks Act seeks to modernise and simplify the framework governing electronic communications infrastructure across the European Union⁷. It aims to reduce regulatory fragmentation, support investment, strengthen network resilience and

⁵ <https://www.idaireland.com/why-companies-choose-ireland/infrastructure>

⁶ <https://www.gov.ie/en/department-of-culture-communications-and-sport/publications/national-broadband-plan>

⁷ <https://digital-strategy.ec.europa.eu/en/policies/digital-connectivity-ireland>

create a more efficient environment for infrastructure deployment. This aligns with our view that barriers within the Single Market should be removed. Implementation must nevertheless avoid unintended disadvantages for smaller Member States such as Ireland relative to larger EU markets.

Implementation should be aligned with the relevant provisions of the Gigabit Infrastructure Act and supported by adequate administrative capacity at national and local level.

Key Recommendations

Recommendations on alignment with the Gigabit Infrastructure Act

The Digital Networks Act should complement and reinforce the objectives of the GIA by addressing barriers that continue to slow network deployment and increase costs across the EU

1. Part V: Streamlined Permitting, Wayleave processes and Approvals

Delays in planning, permitting and road-opening processes can significantly slow the deployment of digital infrastructure. Wayleave agreements⁸ can continue to delay infrastructure projects, particularly where multiple landowners are involved or access arrangements take time to secure. While the DNA may help simplify aspects of deployment, these practical challenges are likely to persist. The Department should examine whether additional guidance, standardised processes and dispute resolution mechanisms could help reduce delays linked to wayleave agreements.

Greater consistency across local authorities and clearer timelines for implementation can help reduce uncertainty and accelerate rollout. New legislative requirements will only deliver meaningful benefits if local authorities and public bodies have the resources and expertise necessary to administer them efficiently.

2. Part V: Improved Access to Existing Infrastructure

Improved access to existing infrastructure, including ducts, poles, masts and other passive assets, can reduce deployment costs and avoid unnecessary duplication. This is particularly important in regional and rural areas where rollout can be more challenging and expensive. Access arrangements and infrastructure sharing should therefore remain proportionate while preserving incentives for continued investment.

⁸ <https://findivo.ie/blog/wayleave-agreements-ireland>

3. Part V: Coordination of Civil Works and Infrastructure Deployment

Better coordination between telecoms operators, utility providers, local authorities and transport bodies can reduce costs, minimise disruption and avoid duplication. ‘Dig once’ principles⁹ should also be strengthened and will provide benefits in terms of:

1. Reduced deployment costs for telecoms operators.
2. Reduced disruption to businesses and road users.
3. Faster rollout of broadband and mobile networks.
4. Less duplication of civil works.
5. More efficient use of public funds.

In addition, greater consistency around access to public assets would further support efficient rollout and provide greater certainty for network operators.

Support Single Passport and Cross-Border Authorisation

Articles 9-11: General Authorisation and Single Passport Framework

The DNA introduces a Single Passport authorisation model allowing operators to provide services in several Member States by notifying in one Member State. A more streamlined authorisation process has the potential to encourage investment, increase competition and improve the availability of digital services. This has a net positive impact for both businesses and consumers. Irish authorities should retain clear and effective enforcement powers where services are provided in Ireland, particularly in relation to service quality, network resilience, fraud prevention, cybersecurity and business-user protections. Simplification should reduce regulatory duplication without creating uncertainty over accountability or weakening protections.

⁹ <https://www.itu.int/itu-d/reports/regulatory-market/2022/01/31/digital-policy-and-regulatory-incentives>

Implement an SME Test

Apply an SME impact test to implementation.

Any new reporting, authorisation or compliance obligations arising from the DNA should be assessed for their impact on SMEs and smaller operators. Guidance should be simple, proportionate and published early. Where obligations affect SMEs indirectly through service changes, pricing, migration or contractual terms, the Department should ensure that information is available in plain English and that implementation timelines are realistic.

Support Fibre Migration While Protecting Business Continuity

Articles 53–61: Copper-to-Fibre Migration

Support the transition from legacy copper networks to fibre infrastructure while ensuring that businesses are protected from service disruption and unexpected costs. Many SMEs continue to rely on copper-based services for payment terminals, alarm systems, monitoring equipment and voice services. Migration arrangements should therefore include clear notice periods, practical transition support and safeguards to ensure continuity of business operations throughout the transition process.

Include SME-Specific Measures in National Fibre Transition Plans

Article 53: National Fibre Transition Plans

Fibre transition plans should include dedicated measures to support SMEs during migration from legacy networks. Smaller businesses often lack specialist ICT resources and may be less aware of upcoming service changes. Clear communication, practical guidance and implementation timelines will help minimise disruption associated with network migration.

Support Long-Term Spectrum Certainty

Articles 13, 18, 24–25 and 31: Spectrum Management

Long-term spectrum certainty is also important to the capacity of the State to maintain reliable connectivity during periods of disruption, as demonstrated by the rapid shift to remote working during the Covid-19 pandemic. Reliable mobile connectivity is particularly important in regions whose economies depend on sectors such as manufacturing, logistics and tourism.

Accordingly, spectrum licensing frameworks should be prioritised that incentivise investment in 5G and future 6G networks, particularly in regional areas where mobile connectivity is critical for economic activity. This should include maintaining clear rollout obligations, supporting infrastructure investment in areas with lower commercial returns, and ensuring that spectrum policy contributes to improved connectivity for industrial estates, logistics hubs and tourism-dependent regions.

Maintain Affordable and Competitive Connectivity

Universal Service and End-User Protection Provisions

Ensure that regulatory changes continue to support affordable access to high-quality connectivity for businesses. Connectivity costs are an increasingly important factor in business competitiveness, particularly for SMEs and firms operating outside major urban centres. Reforms should encourage investment and innovation while preserving competition, affordability and service quality for business users.

Support Proportionate Network Resilience Measures

Articles 4–8: Resilience and Preparedness Framework

Resilience measures should strengthen the reliability of communications networks while remaining proportionate and practical. Businesses increasingly depend on digital infrastructure for payments, communications, cloud services, supply-chain management and customer

engagement. Network outages can therefore have significant operational and economic consequences.

In this context, the Department should develop a National Digital Network Resilience Plan that sets out clear responsibilities and coordination mechanisms between operators and public authorities. DNA resilience obligations should also be aligned with existing cybersecurity and operational resilience requirements to avoid duplication and unnecessary administrative burdens for businesses.