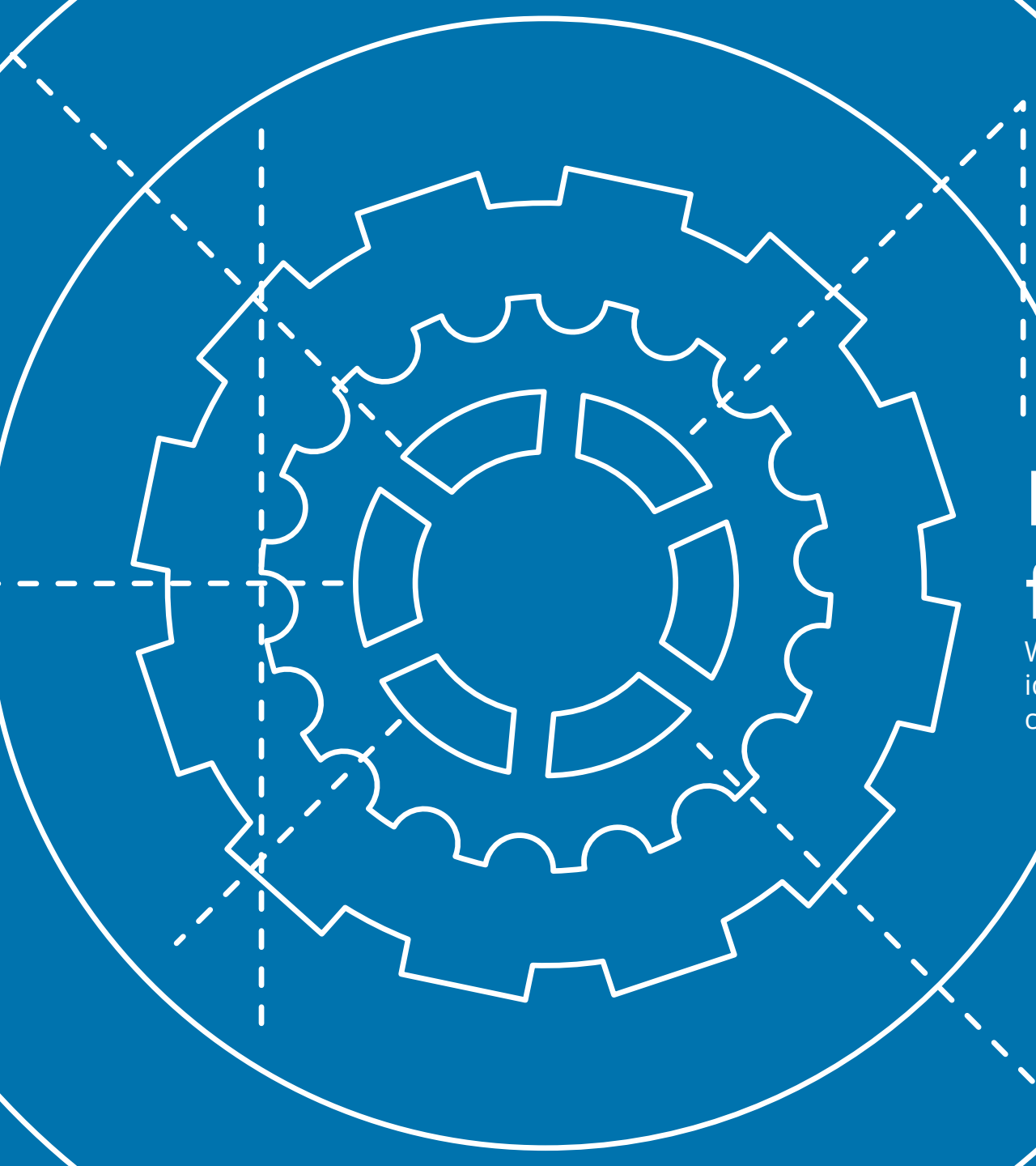


Electronic Communications Framework and the Provision of IoT Services

Maria Zervaki
27 February 2019



Leading countries to fair tech

We monitor and analyse global trends for risks and opportunities, then identify strategies to mitigate those risks and drive the opportunities to our clients' advantage through a unique mix of policy and technical expertise

Regulating an ECS

Applicability of the electronic communication regulatory framework

Why is it important?

Obligations derive from the qualification of a specific service as an electronic communication service (ECS).

When is it applicable?

It depends on the applicability of the definition of ECS for the respective IoT value chain provider.

What is an ECS under the European Framework?

ECC Directive

- Service normally provided for remuneration
- Service provided via electronic communications networks
- Service consisting wholly or mainly in the conveyance of signals, including M2M services

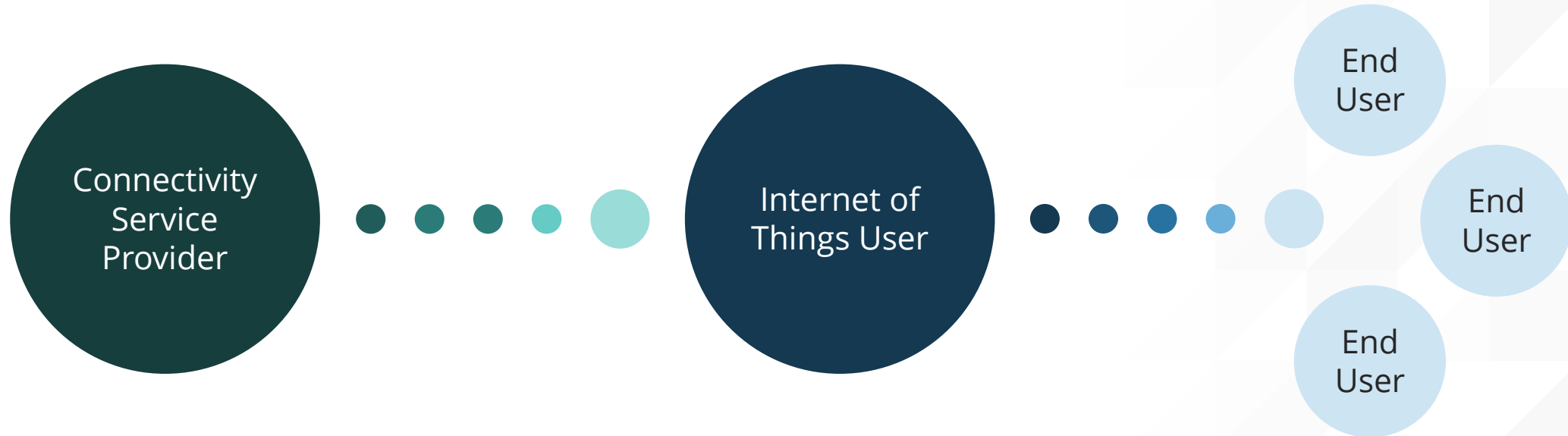


What is an ECS under the Canadian Framework?

- Service provided for remuneration
- Services operated in a transmission facility
- Service used by the owner of the facility or another person



IoT Value Chain



European Union

- Connectivity service provider: ECS
- IoT/M2M-user: typically not ECS, unless reseller

Canada

- Connectivity service provider: ECS
- IoT users (except when end-user): ECS resellers

Conclusion



Different treatment per jurisdiction and per IoT model



Case-by-case analysis required



Need for engagement with regulators to facilitate process



Access Partnership



North America

Europe

Middle East

Africa

Asia

Washington DC

Suite 803
1730 Rhode Island Ave N.W.
Washington DC 20036
USA

Tel: +1 202 503 1570
Fax: +1 202 223 2009

London

9th Floor, Southside
105 Victoria Street
London, SW1E 6QT
UK

Tel: +44 (0) 20 8600 0630
Fax: +44 (0) 20 8748 8572

Brussels

Rue des Sablons 11
1000 Brussels
Belgium

Tel: +32 2 502 0982
Fax: +32 2 515 0019

Abu Dhabi

Al Wahda City Tower, 20th Floor
Hazaa Bin Zayed The First Street
PO Box 127432
Abu Dhabi, UAE

Tel: +971 2 815 7811
Fax: +971 2 815 7888

Dakar

Mermoz Extension, Lot 12, N 05
BP: 45680 Dakar – Fann,
Senegal

Tel: +221 33 827 52 54
Fax: +221 33 827 52 55

Singapore

1 Keong Saik Road
Singapore
089109

Tel: +65 9145 6137

Thank You

Maria Zervaki

maria.zervaki@accesspartnership.com