

## **Connect Europe and the GSMA views on the Digital Omnibus on AI Regulation Proposal**

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As AI becomes the backbone of next-generation connectivity, its successful integration into electronic communications networks (ECN) will determine Europe's ability to lead in innovation, competitiveness, and digital sovereignty.

Europe stands at a critical juncture in shaping the future of AI regulation. As AI becomes integral to next-generation connectivity, the EU must ensure that its regulatory framework supports innovation while safeguarding competitiveness and digital sovereignty.

In this context, Connect Europe and the GSMA, representing the European telecommunications sector, welcome the European Commission's proposal for a Digital Omnibus on AI rules as a positive first step towards ensuring the effective implementation of the AI Act, while supporting the Commission's goals of competitiveness and simplification. We believe several proposals rightly contribute to the simplification objective including the changes proposed to the literacy obligations or the (non) registration of non-high risk AI use cases.

However, for this proposal to succeed, several considerations must be addressed. We call for further simplification of the implementation deadlines for high-risk AI provisions and a swift adoption of the proposal to grant legal certainty to stakeholders.

Connect Europe and the GSMA call on policymakers to deliver clarity, proportionality, and realistic timelines to enable compliance and foster growth. Without decisive action, fragmented deadlines and legal uncertainty risk slowing progress and undermining Europe's ambition to lead in AI-driven transformation.

### **1. High-risk rules should be implemented one year after standards are made available**

Connect Europe and the GSMA welcome the proposal to postpone the implementation timeline of high-risk rules due to the delays in the availability of standards. These standards and guidelines are critical to provide legal certainty, support compliance efforts, and uphold proportionality.

However, implementation and internal compliance processes can only start once these standards and guidelines are finalized, and sufficient time should be allowed for these processes to ensure they are carried out thoroughly and effectively.

For this reason, standards related to the high-risk provisions of the AI Act must be in place at least one year before the provisions are implemented. The current proposal – which grants a 6-month transition period for Annex III systems – will not provide companies with sufficient time to prepare for the implementation.

Therefore, for simplification and legal certainty, the proposal should delay implementation for one year after standards and guidelines are in place, in line with the Commission's previously expressed considerations, and the calls of many stakeholders.

## **2. Implementation date alignment for Annex I and Annex III**

The AI Act currently foresees different deadlines for the transition period for high-risk rules related to Annex I and Annex III of the AI Act. In light of further simplification efforts and proposed changes to the original timeline, we call for aligning these timelines to ensure clarity and consistency for all stakeholders. This means that both Annexes I and III cut-off date will be August 2028. Such harmonisation would reduce administrative burden, provide certainty for industry planning, and support a smoother, more efficient rollout of the AI Act.

## **3. The Digital Omnibus must be approved in time**

It is essential that the Digital Omnibus on AI rules is approved as quickly as possible. With the original implementation deadline for high-risk provisions related to Annex III set for 2 August 2026, there is a major risk that the Digital Omnibus is not approved in time. We therefore call for all policy makers to prioritize the AI Digital Omnibus to ensure its timely approval and publication to avoid creating legal uncertainty for all market players that could derail the overall implementation of the AI Act. As a concrete solution to avoid legal uncertainty regarding the timelines for Annexes I and III we suggest that the provisions regarding application of requirements for high-risk AI systems should be proposed separately from the other parts of the AI Omnibus, which may require additional deliberation and negotiations between the co-legislators.

## **Conclusions**

The European Commission's proposed actions can play a decisive role in ensuring the smooth implementation of AI Act's high-risk provisions, provided they are, formulated with clarity and balance. To realize this potential, swift approval with alignment between Annexes I and III leading to clearer and more proportionate implementation dates is essential. This is not merely a regulatory necessity, it is a strategic imperative for the EU. By fostering AI-powered innovation in Europe's vital industries, such as telecoms, rather than allowing legal uncertainty to hinder progress, Europe can strengthen its global competitiveness and secure its leadership in the digital era.