

Press release

MOBILE NETWORK SHARING**Roaming agreement between Free Mobile and Orange:
Arcep informs the sector and examines the contract**

Paris, 3 June 2025

Free Mobile has been relying on nationwide roaming on Orange's 2G and 3G networks since 2011, with maximum connection speeds that were reduced incrementally starting on 1 January 2017. This agreement between the two operators includes the supply of roaming services up to 31 December 2025 (a recap of previous contractual amendments and their examination by Arcep can be found in the annex to this press release). On 5 May 2025, Arcep received a new contract entitled, *"Roaming agreement on Orange France networks coming to the end of their life"* that defines the conditions under which Free Mobile is able to roam on Orange 2G/3G networks from 1 January 2026 to 31 December 2028.

The new contract submitted to Arcep extends the supply of a roaming solution on Orange's 2G and 3G networks, with a view to shutting down Free Mobile's own 3G network

This contract comes on the heels of announcements from Orange that it will be shutting down its 2G networks at the end of 2026 (with a first shutdown starting on 9 March 2026 in a pilot area covering departments in southwest France, and starting in September 2026 in the rest of Metropolitan France), followed by its 3G networks starting in late 2028, combined with Free Mobile's desire to be able to continue to access a roaming solution that allows it to shut down its own 3G network, and use the spectrum resources that will become available as a result to continue to deploy its 4G and 5G networks.

The agreement therefore provides that Free Mobile will continue to have access to a roaming solution on Orange 2G and 3G networks in Metropolitan France, outside 2G white areas and 3G RAN sharing areas¹, from 1 January 2026 to 31 December 2028, including in those areas covered by Free Mobile's network and where Free will choose to shut down 3G technology on its own network. The following contractual conditions, established in the previous contract, are maintained:

- Capping attainable upstream and downstream speeds for roaming customers at 384 kbit/s, with an addition in the new contract of capping 2G/3G data traffic at 1% of total traffic relayed by Free Mobile's own networks.
- Capping the capacity of interconnection links between Free Mobile's core network and Orange's core network for handling total roaming traffic flow.
- A pricing scheme to incentivise a reduction in the number of Free Mobile customers using Orange's 2G/3G network.

The contract also stipulates that Free Mobile commits to:

- Reassigning the spectrum it was awarded for the operation of a 3G network that will become available for the operation of its 4G and/or 5G networks.
- Continue to deploy its own 4G/5G network, enabling it to expand its network's geographical coverage, density and capacity.

According to the parties, *"Free Mobile's request is part of a new context of 2G and 3G technologies reaching the end of their life in France, while the investment and innovation momentum has shifted and now centres around 4G and 5G technologies – in addition to creating the ability to achieve more efficient use of frequency spectrum."* In the contract's preamble, they refer to the case of mobile network sharing for technologies at the end of their life mentioned in the mobile network sharing guidelines that Arcep published in 2016.

¹ Defined in the contract as being *"geographical areas (including white areas and priority rollout areas) that are covered under the Framework agreement on 3G installation sharing signed between Bouygues Telecom, SFR, Orange France and Free Mobile on 23 July 2010"*.

Arcep informs market stakeholders and examines the new contract

This new agreement is being examined by Arcep, in accordance with the competences entrusted to it by Article L. 34-8-1-1 of the French Postal and Electronic Communications Code (CPCE), notably with respect to regulatory objectives and the network sharing guidelines of 25 May 2016. To this end, the Authority is informing market stakeholders today of the existence of this agreement, with due regard to business secrecy.

Any stakeholders that so desire can send their comments to Arcep before 2nd July 2025 to the following address: partage-reseaux@arcep.fr.

ANNEX:

Recap of the previous contractual amendments and their examination by Arcep

In 2011, Free Mobile and Orange sign a roaming agreement as Free Mobile enters the market

This roaming agreement covers Orange's 2G network across the whole of Metropolitan France, in accordance with Free Mobile's roaming rights as written into incumbent carriers' 3G licences, and on the Orange network on a commercial basis, giving Free Mobile the ability to market its services under fair conditions.

In 2016, this agreement is amended following Arcep's intervention: Free Mobile and Orange agree on a path for phasing out roaming

Since August 2015, Arcep has had the power to request that mobile operators amend their network sharing agreements⁽¹⁾ whenever it appears necessary to meet regulatory objectives⁽²⁾. To provide the sector with clarity on the exercise of this newfound power, Arcep published a set of guidelines⁽³⁾ on 25 May 2016 that set out an analytical framework for assessing mobile network sharing agreements, and called on operators to take them into account.

As a result, Free Mobile and Orange amended their agreement in 2016 to include a trajectory for gradually putting an end to roaming, by reducing connection speeds incrementally up until 31 December 2020. The maximum speeds attainable by Free Mobile's customers roaming on Orange's 2G/3G network were therefore decreased progressively, and have been capped at 384 kbit/s since 1 January 2020.

In February 2020, then in July 2022, two contractual amendments were sent to Arcep, extending the sunset period on roaming by two years and three years, respectively

In February 2020, Free Mobile and Orange signed a contractual amendment that extended the sunset period for Free Mobile's access to nationwide roaming on Orange's 2G and 3G networks up to 31 December 2022. In July 2022, the parties signed a second contractual amendment that extended the sunset period for Free Mobile's access to nationwide roaming on Orange's 2G and 3G networks up to 31 December 2025. Both amendments maintained the cap on roaming customers' maximum upstream and downstream speeds at 384 kbit/s, as well as the cap on of interconnection links between the Free Mobile and Orange core networks, for the flow of total roaming traffic. The financial terms were amended on both occasions, *"to create an incentive to reduce the number of Free Mobile customers using the Orange 2G/3G network"*.

Having observed both a steady decrease in the volume and proportion of Free Mobile traffic being routed via 2G/3G roaming, and the operator's ongoing active investment in its own 3G/4G/5G network, the Authority had concluded that it did not appear necessary to request that Free Mobile and Orange make any changes to their agreement. It also concluded that, in light of the then current state of the market, Free Mobile's ongoing investment in its own network, and the characteristics of the roaming service, the execution of this agreement, as modified by the amendment, which includes the shutdown of the Orange 2G network in France at the end of 2025, was not likely to prevent the market from achieving the regulatory objectives set out in CPCE Article L. 32-1, notably with respect to fair and effective competition that benefits users, and the development of investment, innovation and competitiveness in the electronic communications sector. The Authority added that it would remain attentive to Free Mobile's continued investment in the deployment of its own networks.

(1) This power is set out in Article L.34-8-1-1 of the French Postal and Electronic Communications Code, introduced by Law No. 2015-990 of 6 August 2015 on Growth, economic activity and equal economic opportunity

(2) Mentioned in Article L. 32-1 of the French Postal and Electronic Communications Code

(3) https://www.arcep.fr/uploads/tx_gspublication/2016-05-25-partage-reseaux-mobiles-lignes-directrices.pdf

Arcep at a glance

The Regulatory Authority for Electronic Communications, Postal Affairs and Print Media Distribution (Arcep), a neutral and expert arbitrator with the status of independent administrative authority (IAA), is the architect and guardian of internet, fixed and mobile electronic communications, postal and press distribution networks in France.