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Technology and Legislation: We Need a “Legislative Fast Track”

By the Vice President of EETT, Mr. Michalis Sakkas

It has long been universally acknowledged that the rapid pace of technological change and its integration in the operation of modern societies and the everyday lives of citizens, have created an imperative need for regulations and for social and political adjustments. Especially in the fields of Electronic Communications and Information Technology, the rate of emergence of new technologies, applications and services is so overwhelming that the legislative bodies of the State and the organized social groups are both struggling hard to keep up.

This phenomenon is global. In Greece, however, the chronic intricacies of the legislative procedures of the State add a further twist. Laws refer to secondary legislation or Presidential Decrees that require extended processing or Joint Ministerial Decisions involving 4, 5 or even 6 Ministers that remain perpetually in abeyance (due to cabinet shuffles, changes in government or simply due to bureaucratic delays). Therefore, any effort of the legal system to keep up with technological developments fails because of this inconsistency.

The lag between technological developments and business initiatives, on the one hand, and the legislative system and the application of laws, on the other, is so great as to give rise to a multitude of distortions and contradictions in the affected markets with severe consequences for the National Economy. We are all familiar with many examples of this.

Therefore, we absolutely need a “Legislative Fast Track” (such as the one we have for investments) for all the legislative procedures related to new technologies and especially to Information Technology and Electronic Communications. Its aim would be, first of all, to allow for the rapid harmonization of the legal framework with technological developments and requirements and, secondly, the promotion of the rapid and faithful application of regulations.

This “Legislative Fast Track” must have three components that should of course be absolutely compatible with constitutional requirements and the role of the Legislature: (1) A consensus between the Government and the Opposition is needed, given that technological developments (at least in the fields of Electronic Communications and Information Technology) follow no party line. (2) A special “contract” is needed that would bind the respective Leadership to implement within a fixed deadline all the procedures in its competence with regard to legislation and Ministerial Decisions (Joint or not). (3) The use of international best practices and the information on the respective topics that is already extensively available (especially on issues of Information Technology and Electronic Communications) in the competent state services.

In this way, we will overcome the habitual chronic delays in the legislative process so that regulations can keep up with the fast pace of technological developments, especially in Electronic Communications and Information Technology. This is even more imperative today since the use of new technologies is an important prerequisite to restore the growth potential of the troubled Greek economy.
EETT’s Recommendation to Companies with Digital Call Centers

EETT has published a Recommendation addressed to companies with digital call centers, because recently there have been intrusions into call center systems and companies have been charged with high bills.

The intrusion into companies’ digital call center systems by taking advantage of security gaps is the result of malicious interventions by external agents (hackers) aiming to conduct high-cost calls (e.g. to foreign countries with high charges). In certain cases, the calls are conducted when the companies are closed and the unusually high traffic is often directed in a very short time period. The result is that companies are charged with sky-high bills that they have to pay to their telephone operator.

Consequently, EETT recommends that companies with digital call centers should do the following:

• Contact their call center/system operator in order to confirm that the software used, includes the latest updates to avoid non-authorized access and that the most effective security mechanisms have been implemented.
• Contact immediately their telephone operator, if they identify any unusually high charges in their bill. In case of malicious traffic, they can ask the operator to block outgoing traffic to the destinations at stake. Finally, they can contact the Department of Computer Crime of the Attica Security Police.
BEREC is a European institution that was established by Regulation 1911/2009 of the European Parliament and the Council of November 25th, 2009. Its objective is to contribute to the development of the electronic communications market in the European Union (EU) through the establishment of a common regulatory environment in the member states.

In the 5th Plenary Meeting of BEREC, held in Bruges, Belgium, on December 2nd & 3rd, 2010, of EETT’s President, Dr. Leonidas Kanellos, was elected Vice-Chair of the Body for the year 2011. He was elected unanimously by the 27 Regulators of the EU member states comprising the Body, as well as by the representatives of the European Commission. The position of BEREC’s Chair for 2011 will be assumed by the President of the Dutch Regulator. EETT’s unanimous election in BEREC’s Vice-Presidency and Management Committee is a special honor for our country, as well as a real recognition and vote of confidence for the Greek Regulator. This development is particularly significant in the context of our country’s current difficult economic predicament.

EETT will respond to this new challenge with its distinctively strong sense of responsibility and will continue to work for setting up a strategy that will benefit both the consumers and the market at the national and international level. Several officials from EETT will actively participate in most of the working groups for the implementation of BEREC’s ambitious program for 2011, which comprises the following 12 working groups:

• **Benchmarking**: The aim for 2011 is:
  a) to establish a methodology for monitoring the tariffs for mobile broadband services,
  b) to enhance cooperation with the European Commission on issues of monitoring and comparing broadband tariffs,
  c) to collect data on termination rates for voice and SMS services in mobile communications networks and
  d) to design a methodology and collect data regarding termination rates for voice services in fixed networks.

• **BEREC-RSPG Cooperation**: The aim is to cooperate on issues of spectrum management and utilization such as
  a) the European Commission policy on the frequency spectrum,
  b) digital dividend issues and
  c) technological issues related to the neutral use of the radio spectrum.

• **Convergence and Economic Analysis**: It includes 5 actions:
  1. Competitive effects of NGA (Next Generation Access) co-investments. This action will outline the various possible co-investment scenarios for developing optical networks and will provide guidelines to the member states’ regulators for the definition of an operator with Significant Market Power (SMP) for Markets 4 & 5 in case of NGAs.
  2. The impact of fixed-mobile substitution in market definition, which is expected to play a central role in the next market analysis cycle to be conducted by the national regulators.
  3. Specific aspects of broadband commercialization. This action will examine the methods / terms used by telecommunications operators when they offer broadband products to consumers (e.g. discounts, minimum commitment period, product combinations etc.) since these terms could under certain conditions limit the entry of other operators into the market.
  4. Wholesale initialization for value added services. This action includes the conduct of a combinatorial survey on this market’s potential in the member states for the relevant voice and SMS services. It will also analyze the methods used by the national regulators to deal with related issues in the cases of market
It includes 2 actions:

1. Broadband strategies. This action will analyze the role of different mechanisms for the promotion of broadband in the European Union (EU), such as public-private partnerships, state subsidies, the smart use of the digital dividend, the introduction of broadband as part of the Universal Service, etc. It will also analyze the relation between these mechanisms, given that they very often exceed the role and responsibilities of national regulators and of BEREC more broadly.

2. Net Neutrality: It includes 2 actions:
   1. Net neutrality and transparency. This action will examine a series of methods for achieving transparency and the information needed by consumers in order to select broadband products. It will also examine the methods for properly informing consumers and the ways of supervising and monitoring telecommunications operators.
   2. Net neutrality and quality of service. This action will examine the possibility of enforcing a minimum quality standard for broadband services and it will explore the competences required for national regulators in order to monitor and enforce such broadband standards.

3. Broadband strategies. This action will analyze the role of different mechanisms for the promotion of broadband in the European Union (EU), such as public-private partnerships, state subsidies, the smart use of the digital dividend, the introduction of broadband as part of the Universal Service, etc. It will also analyze the relation between these mechanisms, given that they very often exceed the role and responsibilities of national regulators and of BEREC more broadly.


5. Competition issues related to net neutrality. This action will examine competition interventions and other possible regulatory interventions that could be employed when examining cases of net neutrality in relation to wholesale markets. It will also examine the methods used by the ISPs for limiting access to content, such as the downgrading of quality, the peering and transit policies and the pricing methods.

• International Roaming: This action will collect data on the implementation of the regulation on international roaming by the mobile communications operators and it will also analyze the advantages and disadvantages of the various regulatory methodologies regarding retail prices and issues of consumer protection.

• Remedies monitoring: This action will monitor the implementation of BEREC’s common positions by the national regulators and the harmonization of regulatory measures in the member states.

• Regulatory Accounting: It includes 2 actions:
   1. Regulatory accounting report. This action will determine the level of harmonization achieved by the national regulators and it will investigate along with EU participation and guidelines, the possibilities for further convergence between the member states.
   2. NGA Cost Accounting. This action will analyze the impact on costing accounting principles of the new Recommendation on NGA regulation, especially with regard to wholesale access products (duct access & dark fiber).

• Termination Rates: This action will examine the implementation of the EU Recommendation on termination rates for fixed and mobile communication networks in the member states.

• Network & Information Security: This action will examine security issues as well as issues related to the integrity and availability of telecommunication networks.
Second Round of Market Analysis regarding Retail Calls provided at a Fixed Location

by Mr. Stratos Fragoulopoulos, Deputy Head of the Telecommunications Regulation Department of EETT’s Telecommunications Directorate

The changes in the market affecting the retail call services provided at a fixed location in the period after the first round analysis concern mostly the significant increase of the unbundled lines used by alternative operators for voice and broadband services, as well as the fact that the alternative operators are offering new –mostly bundled–retail service packages that include a broad range of services (such as unlimited local and national calls and broadband access to the internet). These developments have significantly restricted the carrier selection and pre-selection business model (CS/CPS), which was the basic model in the first stage of market liberalization. Other important developments were the mergers and acquisitions of alternative operators and the exit from the market of certain operators which were based mostly on CS/CPS.

In view of the above, EETT has arrived at the initial conclusion that there are two distinct relevant retail call markets in Greece, and these are:

• The market of calls to non-geographic numbers provided to residential and non-residential customers at a fixed location in Greece (fixed to mobile calls and calls to service providers through non-geographic numbers).

After implementing the three-criteria-test, EETT found out that:

• There are high and non-transitory entry barriers to these markets.

• The characteristics of these markets are such that they will not tend towards effective competition in the course of time.

• Competition law on its own is not sufficient to confront any failures identified in these markets.

Based on the above, EETT concluded that both markets are susceptible to ex ante regulation.

In examining OTE’s market power based on its market share both in relation to other operators and in view of the development of the market, the potential development of competition and the absence of retail customers’ countervailing buyers power, EETT concluded that these markets are still characterized by lack of effective competition and that OTE has still significant power in the defined markets.

Finally, EETT decided to preserve the regulatory obligations imposed on OTE in the context of the first round of market analysis in order to confront possible competition problems. More specifically, EETT imposed:

• Price control in the form of:
  - The imposition of a price cap on retail prices/retention fees for certain types of calls (local calls, national calls, calls to mobiles, dial-up calls). These price caps will apply to OTE’s tariffs for basic charges.
  - OTE’s obligation to include the call services in its cost accounting system (using the methodology of the Fully Distributed Cost/Current Cost Accounting, FDC/CCA top-down model) and to provide EETT with all the data required for calculating the cost of the relevant products on an annual basis.
  - The obligation of cost accounting using the methodology of the Fully Distributed Cost/Current Cost Accounting (FDC/CCA top-down model). OTE’s FDC/CCA cost accounting model will be audited
on an annual basis by independent auditors assigned by EETT and a statement of compliance will be issued subject to the national and European rules regarding business secrecy.

- The obligation of accounting separation for all calls so as to provide a higher level of detail, to monitor closely the behavior of OTE in terms of providing retail voice calls as if they were a separate business activity, and also to prevent any cross-subsidy.

- The obligation not to discriminate with regard to all types of retail calls. According to this obligation, it will be prohibited for OTE to discriminate between its customers in the provision of retail call services. EETT proposes to expand this prohibition of discriminatory treatment to all forms of discrimination that may prevent competition.

- OTE’s obligation to provide to EETT all the data regarding its compliance with the general provisions on transparency and on the publication of information prescribed under the “Regulation on General License” and the “Code of Practice for the Provision of Electronic Communication Services to the Consumers”.

- OTE’s obligation not to conduct any unjustifiable product bundling. EETT considers unreasonable the bundling of products or services when the consumer cannot buy separately any product/service he or she wishes but only in the form of the bundled product. Furthermore, in order to prevent the restriction of market transparency due to cases of product bundling, OTE’s transparency obligations will also apply to cases of product bundling. The obligations related to the problem of overpricing and those related to preventing the distortion of competition due to unjustifiably low prices will also apply to bundled products just as to unbundled products. More particularly, every time OTE wishes to introduce bundled products/services or wishes to modify the terms of a package/offer, it will be obliged to submit in advance its proposal to EETT along with all the necessary data. OTE has the burden of proving that its proposal does not entail predatory pricing or margin squeeze. After the audit, EETT may approve the modifications under certain conditions or may disapprove the entire proposal of OTE.

In the framework of the second round market analysis, EETT shall examine in the near future the retail access markets in the public telephone network and the markets for wholesale and retail leased lines. The second round market analysis cycle is expected to end during the first semester of 2011.
One of the biggest challenges for the Ministry of Infrastructure, Transport and Networks is to complete the process of full transition from analog to digital broadcasting. Although this process is under the international obligations of our country – mostly under the Geneva agreement (GE-06) according to which the reserved frequencies of analog broadcasting will be protected until the end of 2015, but also under the European guidelines prescribing that the transition must be completed during 2012 – we ought to see it as an opportunity for economic growth, technological progress and improvement of the quality of life for all citizens.

There is no doubt that there will be many benefits out of the transition from analog to digital terrestrial television for both the operators and the consumers. More specifically, digital television:

- Ensures a more stable and higher quality of image and sound with less transmitting power thanks to perfect reception without interference.
- Allows television stations to broadcast their programs in a cheaper and more effective way since the cost of transmitting a codified broadcast is much lower as compared to analog.
- Offers the possibility of broadcasting more than one television program from a single frequency depending on the compression applied by the operator.
- Allows for the distribution of the cost of terrestrial broadcasting between different television program providers.
- Offers the possibility to develop a multitude of innovative digital interactive services and applications.
- Promotes green development because the new applications and services – such as electronic shopping, distance learning, telemedicine etc.– abolish geographic distances and significantly reduce the energy consumption and emissions related to transport.

The Ministry of Infrastructure, Transport and Networks, within the limits of its jurisdiction and with a view to organizing, effectively coordinating and supervising all the actions required for the successful transition to digital
broadcasting, has already set up a Task Force with the participation of all the stakeholders (telecommunications operators, the other Ministries involved, the National Council for Radio and Television, EETT etc.). The Task Force will submit proposals in order to prepare the appropriate institutional framework, evaluate the available technologies of digital broadcasting, establish a broadly accepted model, set out a specific timetable for a prompt and coordinated transition, propose actions for informing the public and make suggestions on using the potential of digital television for the benefit of the citizens. Alongside the Task Force, the Ministry is also making an effort in order to secure –through European funds– a significant number of decoders to be handed out freely to vulnerable social groups (people with disabilities, unemployed persons etc.)

These initiatives are only part of a broader strategic plan by the Ministry of Infrastructure, Transport and Networks for the comprehensive transition of the country to the new digital age, which comprises four main pillars:

- Assessing the value of the digital dividend and configuring the new frequency map.
- Preparing for the full transition to digital television and radio.
- Promoting the necessary regulations in cooperation with all the bodies involved.
- Fixing the situation in the domain of antennas.

In cooperation with the Special Secretariat for Privatizations, we have promoted the assignment of a technical-financial consultant for estimating the spectrum by taking into account the digital dividend that will ensue from the transition from analog to digital television. Undoubtedly, the possibilities offered by the digital dividend are many: from the most advanced mobile phones and the wireless internet connections – that will bridge the digital gap between center and periphery – to the new high definition interactive television channels and from teleworking and telemedicine to electronic commerce. However, these possibilities must be utilized in an organized and structured way in order to ensure the maximum benefits for the Greek economy and society. This is precisely the aim of this particular study. It is worth noting that the respective studies in European countries at a more mature stage of transition have shown that the benefits for the national economies amount to hundreds of millions of Euros.

In parallel with the above, the Ministry has set up several Working Groups that are elaborating the secondary regulations for complementing the existing legal framework - wherever this is necessary- with regard to frequency maps, the licensing procedure for antenna systems, the spatial planning of antenna parks and the conduct of negotiations with neighboring countries in order to achieve international coordination and reservation of frequencies according to international standards. Undoubtedly, the implementation of all these plans of the Ministry of Infrastructure, Transport and Networks will be based, to a significant extent, on the parallel and/or complementary actions of the Hellenic Telecommunications and Post Commission.

In an adverse economic conjuncture such as the current one, the successful digital transition – the so-called Digital Switchover – can become a powerful tool for economic growth and for exiting the crisis by encouraging investments and innovation, creating new jobs and contributing substantially to the fight against social exclusion. The Ministry of Infrastructure, Transport and Networks is prepared to fully meet this challenge.
Each year, EETT collects data directly from the postal sector operators which are analyzed and processed, so as to provide the necessary tools for effectively regulating and supervising the market, securing a competitive environment and protecting consumer rights.

Postal market reviews are published on the EETT website and they are analyzed by EETT staff and presented to market operators. Furthermore, they are an important source of knowledge and information for the European Commission and for sector reviews conducted by other organizations.

The methodology used for the review followed the standards established in the preceding years. The review was conducted by sending questionnaires to all the operators that had a valid registration number in the postal operators’ registry by the end of 2009. Apart from collecting statistical data, the procedure of sending the questionnaires is a useful tool for maintaining communication with the businesses enlisted in the EETT registry.

The analysis of the postal market is divided into two sectors: a) the universal service sector, which includes the Universal Service Provider (USP – ELTA) and all the private operators that have an Individual License for providing postal services and b) the Courier sector, which includes all the operators providing postal services under a General Authorization.

The total size of the Greek postal market is influenced considerably by the respective changes in the rates of the USP, which has the biggest market share. Its share amounts to 60% in terms of revenue and 92% in terms of volume and these rates have remained relatively stable during the last five years. In the Universal Service sector (that includes five operators apart from the USP), which is not fully liberalized, the market share of the USP amounts to 99%.

In contrast, the Courier sector is different because it is a fully liberalized market and includes a high number of operators. However, the most important influence in the market comes from a few big companies that have developed their own postal networks throughout Greece and have managed to establish themselves in the market and in the consciousness of the consumers. Almost all the other Courier operators cooperate with these companies. According to the reviews conducted by EETT, in the last five years (2005-2009), the big operators have handled around 88% of the total Courier items and have commanded a similar share in terms of revenue.

In Greece there are many operators active in the postal market and their number has been constantly growing in recent years. This growth is led by new companies that wish to operate in the Courier sector and contact EETT in order to be enlisted in Registry. The number of companies in the Greek postal market at the end of 2009 amounted to 1,205, including the members of the Networks established by the operators licensed by EETT. Approximately 21,000 people were employed by these companies either full or part time in 2009 and around half of them were USP personnel.

With regard to the results of the Greek postal market in 2009, the financial crisis and the extensive use of electronic media did not leave the market unaffected. Thus, in comparison with 2008, there was a decline of approximately 6% in the volume of items handled in the postal market and a fall by around 1% in the respective revenues. More specifically, the total amount of items handled in the postal market fell to 728 million from 777 million in 2008, whereas the total revenues fell to 743 million from 753 million Euros. The adverse circumstances that prevailed in the Greek market during 2009 were reflected in the financial results of
the companies of the sector, with a noticeable deterioration of the financial ratios compared to 2008.

In the European postal market, the main trends observed in recent years are, on the one hand, the gradual decline in the handling of letter-post items due to large-part to electronic substitution and, on the other hand, the rise in the handling of parcels due to the growth of electronic commerce and on-line shopping. In Greece, there was a decline in 2009 both in the volume of letter-post items and in the volume of parcels compared to 2008. This trend is expected to gradually turn around since in recent years the percentage of Greek users who trust the internet for shopping on-line has been steadily growing according to official studies.

In the universal service sector, the total average charge increased by 6.6%. The average charge for handling letter-post items up to 2 kg (84% of total items in the universal service sector) rose by 2.6% compared to 2008.

In the Courier sector, the total average charge remained at approximately the same level as in 2008 (-1.2%). More specifically, the average charge for handling domestic items, which account for 99% (73% for letter-post items and 19% for parcels) of total Courier items, grew by 16%, mostly led by the rise in the average price for the handling of items. According to the results of the review, this is due to the fact that the items handled are fewer but heavier and, therefore, more expensive, since in 2009 there was a dramatic fall in small parcels, and it may also be due to an attempt on the part of the operators to offset the general decline in the volumes handled.

The developments that will occur in the coming years in view of the imminent deregulation after January 1st, 2013 are expected to have a significant effect on the further growth of the Greek postal market. In this context, EETT is exercising its competence by intensifying its efforts for better serving and protecting the consumers and is also conducting information campaigns on the postal services both through its website and though other means (conferences, leaflets etc.).

A Summary of the Review is available in EETT’s website (EETT/Postal Services/ The Postal Services Market/Greek Postal Market: Data and Trends of the Market 2009 – Executive Summary).
The Question of Properly Informing Consumers in Electronic Communications

by Mr. Alexis Spiropoulos, Head of the Legal Services Department, EETT

More specifically, through its aforementioned decisions, EETT examined whether subscribers were lawfully and properly informed on the rise of the minimum call charge that was obviously an adverse modification in the contractual relationship between the subscribers and the mobile telephony operators. These decisions were added to an already extensive list of previous decisions in which EETT has occasionally imposed heavy fines on various companies operating in the market of electronic communication services on the grounds of not properly informing consumers. It is also worth noting that the reasoning behind EETT’s decisions has been repeatedly confirmed by the administrative courts when judging appeals by these companies against the administrative sanctions imposed by EETT. It could be further argued that there is by now a settled case-law in favor of EETT’s positions on these issues (see for example Admin 1327/2009 & 1952/2008).

In this particular case of the rise of the minimum call charge by 3 mobile telephony operators, EETT found out that the notification to the general public about this adverse modification in the contractual relationship between the companies and the subscribers was conducted in violation of the right of the consumers to be properly informed. More specifically, it was proven that the companies attempted to hide the increase of the minimum call charge or to present it in an unclear or misleading way, especially if one takes into account the fact that they addressed a very broad public that was not necessarily familiar with current technical terminology. Moreover, in certain cases, the companies failed to inform their subscribers about their right to challenge the contract, although this particular obligation was explicitly mandated by EETT’s regulatory documents.

EETT’s intervention on this particular case was crucial since the Regulator conducted an extensive examination of subscriber accounts, press releases and the companies’ websites and did not limit itself to a perfunctory check on whether the companies had issued the announcements prescribed in the current regulatory framework. In contrast, the Regulator thoroughly investigated whether these announcements corresponded to the spirit and the objective of EETT’s regulations and of Law No. 2251/1994 on consumer protection.

By virtue of EETT’s decisions, it has become apparent that the emphasis on the obligation to provide information in a clear, accurate, updated, comprehensible and simple way imposed by current regulations in the case of unilateral modification of a contract term, among others, aims precisely at presenting information in a completely transparent way and is not limited to a general notification to the subscriber. In other words, the legal obligation of transparency and clarity prescribes that any adverse modification must be understood by every consumer in a simple and easy way and without leaving any doubt. Otherwise, the consumer is misled and his freedom to challenge the contract, terminate the subscription and seek another operator or a different mode of communication is compromised.
Our aim is to create a dynamic, constantly evolving vision with a strong European orientation that would be harmonized with the Digital Agenda 2020 of the European Commission.

In order to achieve this, we rely on two pillars: (a) The active involvement of the citizens in a participatory and collective spirit that is more critical than ever in our current predicament. (b) The positive involvement of the Government in view of the fact that Digital Greece has been placed under the aegis of five Ministries (Min. of Infrastructure, Transport and Networks, Min. of Finance, Min. of Interior, Decentralization and E-government, Min. of Economy, Competitiveness and Shipping, Min. of Education, Life-Long Learning and Religious Affairs).

Since the very beginning, EETT has embraced this effort and has been actively supporting it with financial, human and technological resources.

Operationally speaking, “Digital Greece 2020” has a twofold presence, physical and digital. In its physical form, it operates through open meetings between working groups that allow for the exchange of views and the synthesis of different positions. In its digital form, it operates through a virtual dialogue on the internet (http://www.digitalgreece2020.gr) that allows any citizen from any corner of the country to submit his or her views.

This dialogue is centered on 7 areas of action that parallel those of the European Commission’s Digital Agenda 2010 (without ignoring the Greek particularities) and are supported by 7 Working Groups (Public Administration & Society – e-Entrepreneurship – Education, Innovation, Research – e-Inclusion & Digital Literacy – Trust & Security – Interoperability, Free Software/Open Source Software (FS/OSS), Open Content & Data – Next Generation Access Networks).

For the first year of operation (June 2010 – June 2011), we have set up an ambitious timetable that aims, on the one hand, at establishing the foundations and guidelines for the operation of the Forum and, on the other hand, at collecting and submitting a series of well-documented policy proposals to the Government.

The first aim has been already achieved with the establishment of the Organizing Committee and the Strategy Committee, the drafting of the Operational Plan and the organization of the Working Groups. These actions took almost 4 months to conclude.

Since mid-October, the Working Groups have begun their consultations which are open to any interested party. The first results concern proposals that can be adopted and implemented in the immediate future and can contribute substantially to our country’s progress towards the digital economy. These results have been presented in a joint conference of the Strategy Committee, the Organizing Committee and the Coordinators and Technical Directors of the Working Groups under the coordination of Mr. Th. Karounos from the E-Government Group of the Prime Minister’s Office and in the presence of the General Secretary for Communications, prof. S. Katsikas.

The next step is to synthesize these proposals in order to present them to the general public and submit them to the competent authorities. At the same time, the dialogue in the Working Groups is continuing, and the aim is to draft during the 1st semester of 2011 the first complete policy documents for Digital Greece 2020 that will also be presented during the events organized in the framework of the European Digital Agenda.
The Constructive Contribution of EETT in the International Dialogue on Regulatory Policies

The prompt integration of international experience in the Greek market is one of our Authority’s consistent strategic objectives. That is why EETT is actively participating in the international dialogue with a series of actions such as:

A. Participation in meetings of International Organizations and Telecommunications Conferences.

In November 2010, EETT was invited to present its views on broadband development in the Global Forum 2010 that was held in Washington, DC in the USA. The participants at the Forum included senior government officials, Presidents of Regulatory Authorities and representatives from the industry. The Forum focused on next generation telecommunication systems and their development which is expected to bring significant changes in the coming years. There was special reference to the challenges that regulators are expected to confront.

On the fringe of the conference, a bilateral meeting was held between EETT and the US Regulator (Federal Communications Commission-FCC) in order to exchange know-how on issues of consumer protection and quality indicators monitoring for broadband connections, confirming the excellent collaboration between the two Authorities.

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In the framework of its responsibilities, EETT was also represented in the meetings of a series of international associations, organizations and bodies. More specifically, EETT participated in the following:

• The workshop of the European Network and Information Security Agency (ENISA) on the harmonization of Article 13a of the Framework Directive on the security and integrity of networks and services (09/24/2010).
• The Forum of European Supervisory Authorities for Electronic Signatures (FESA) on issues related to electronic signatures (10/18-20/2010).
• In a workshop organized by the German Regulator (BNetzA) on the methodology of spectrum auctions (10/29/2010).
• In a meeting of the Internet Corporation for Assigned Names and Numbers (ICANN) in Cartagena, Colombia where the discussion focused on domain names (12/04-10/2010).
• In the Plenary Meeting of the Euro-Mediterranean Network of Regulators (EMERG) on setting the agenda for 2011 (12/14-15/2010).

Also, EETT was invited to present its views in the following fora:

• The 7th Global Technological Forum (STS Forum) in Kyoto, Japan (10/03-05/2010)
• The International Regulatory Forum 2010 in Barcelona (10/16-19/2010)
• The 2nd Albanian Telecom Forum in Tirana in mid-December 2010.

B. Participation in International Postal Events: ERGP, UPU, CERP, PDC Plenary

During the last two months of 2010, EETT participated actively in many international postal events. More particularly, it participated through its President, Dr. Leonidas Kanellos, in the first Plenary Meeting of the European Regulators Group for Postal Services (ERGP) on 12/01/2010 in Brussels. The ERGP was established in August 2010 by a Decision of the European Commission aiming to create a single European postal market through cooperation and adoption of common practices by the European Postal Service Regulators.

On 11/11/2010, EETT took part in the Forum organized by the Universal Postal Union (UPU) on the role of Regulators in a period of intense change due to electronic substitution and liberalization of the postal market.

Also, EETT was present at the 43rd Conference of the Comité Européen de Réglementation Postale (CERP) where the discussion focused on redefining its responsibilities so as to avoid any overlap with the newly established ERGP. Its role is to be oriented towards issues such as policy-making in the postal sector, relations with the Universal Postal Union (UPU) and the effective coordination and preparation of the European countries before any global Conference.

Finally, EETT participated in the Postal Directive Committee (PDC) set up by the European Commission both at the level of working groups and in the Plenary of 9th December, where the discussion focused on the implementation of rules on public procurement and on the VAT in the postal service sector.
TO: Consumer Service Sector EETT  
CC: EETT’s President / Mr. Leonidas Kanellos

Gentlemen,

My name is Anna Mastroyannakis. With this letter/e-mail I would like to express my sincere gratitude and to congratulate you on the impeccable way in which you handled a problem with a Greek telecommunications operator that had preoccupied me for a long period of time.

The advice I received from your staff for resolving my problem, their immediate response to my call, their familiarity with the issues they handle, their discrete but effective presence and their intervention have sincerely surprised me in a positive way, having been accustomed to a very different treatment from Greek public authorities.

I was struck by the fact that I was able to communicate with the company about my problem only after your mediation! Until then, it was impossible to communicate with them! This proves that your intervention was crucial.

It is worth noting that I have spoken about EETT and recommended it to several of my friends and acquaintances, who were treated in the same manner by your staff in their disputes with telecommunications or transport companies and had their problems solved in the same immediate and effective way!!

I would really like to congratulate you on the quality of your work, your respect for simple, everyday problems that Greek consumers are facing and for the very significant assistance that you offer to them through your services!

I wish all public authorities -and private as well- manifested the same respect and efficiency in their work.

I hope that you will continue to do your work in the future in the same impeccable way as you have done so far.

Once again, congratulations and thank you very much!  
Anna Mastroyannakis
Information Leaflet on the Universal Postal Service

Full in line with its determination to continuously inform the customers about their rights, EETT has published a leaflet with instructions regarding the Universal Postal Service.

The Universal Postal Service refers to the traditional postal services offered today to consumers by the Hellenic Post (ELTA). The Universal Service ensures postal services to all citizens - wherever they live - on a constant basis, in accessible prices with a transparent and uniform pricing system for the entire country and a fixed quality standard.

The Hellenic Post is by Law the Universal Postal Service Provider in Greece and, as a consequence of that, has certain responsibilities towards consumers.

The leaflet outlines in a thorough yet clear and concise way the obligations of the Universal Postal Service Provider with respect to (a) collection and distribution, (b) the immediate delivery of A' priority mail, (c) the access points for letters and parcels, (d) the delivery of parcels, (e) providing effective service, (f) paying compensation, (g) establishing a Dispute Resolution Committee and (h) protecting the confidentiality of communications. Finally, it advises consumers on how they can contribute to improving the Universal Service (e.g. guidelines on how to properly write one’s personal details on an envelope and how to properly pack a parcel, how to ensure the proper maintenance of mailboxes etc.).