

4.5. Safety and Quality of Electronic Communications Networks and Services

4.5.1. Network Contingency Planning

EETT within the context of its competencies, in an effort to safeguard the uninterrupted provision of services to consumers, has started, in collaboration with an expert consultant who was selected following a tender process, the definition of action plans that cover emergency situations that might occur to telecommunications networks.

These emergency situations may, among others, include the following:

- The increase of telecommunication traffic, either due to anticipated peak periods or special events (e.g. national or religious holidays, international cultural or sports events, crisis situations, natural or industrial disasters) which might be concentrated in specific geographic areas.
- Failures in telecommunications infrastructures.
- Telecommunication congestion in interconnected networks (national or international).

In an emergency situation, a telecommunication network may be subject to overload (i.e. excess telecommunication traffic as compared to the traffic under which the network is designed to operate) or lose part of its capacity. This means that the network is not able to meet the telecommunications needs of users (e.g. reduced processing capacity and lower than the agreed quality of services to subscribers).

The aim of the project is to specify certain national action plans to deal with contingencies situations. These plans will be analyzed using specific procedures and stages and accurately describing the role of each body. In order to develop the national action plans, the existing contingency plans of telecommunications providers and the international experience are taken into account.

The project is expected to be completed by the end of the first half of 2005, after a Public Consultation in relation to the proposed contingency plans. Participation and wide acceptance of the outcomes by telecommunications providers is critical for its success, since those providers shall be invited to implement the action plans, taking into account the proposed necessary measures.

4.5.2. Telecommunications Networks and Services Quality Indicators

The quality of telecommunications networks and the provided services are decisive factors for the selection of a provider in a competitive market. Therefore, the provision of information in relation to network and service quality in a comprehensive, comparable, easily accessible and updated mode is particularly useful for consumers. This is achieved through quality indicators.

Significative examples of indicators are the initial connection delivery time, the frequency of failures per connection and the time of failure restoration, the percentage of missed calls and the time of restoration, the accuracy of bills, etc.

These indicators constitute a useful tool for consumers in the selection of services and providers and contribute to a better understanding regarding the level of services provided. Moreover, indicators act as a motive to providers in order to improve their services for retaining and strengthening their client base.

Given the benefits to consumers and the establishment of competition, EETT decided to prepare a Public Consultation, which shall be held in January 2005, in relation to the above issue for fixed telephony services. The interested bodies, including consumers, shall be invited to express their views and comments on three main subjects:

- a) Quality indicators which, in their opinion, should be used for fixed telephony services.
- b) The exact measurement methodology.
- c) The publication procedure of the relevant results.

4.5.3. Safeguarding Universal Service Provision

Safeguarding US provision (i.e. a predetermined ensemble of basic telecommunications services available to all citizens of the Greek territory regardless of their geographic location at affordable prices) is one of the top priorities of EETT.

Comprehensive Telephone Directory – Comprehensive Directory Enquiry Service

Regarding this issue, the main concern of EETT during 2004 was to ensure that a Comprehensive Telephone Directory would be issued, as well as the provision of a full comprehensive directory enquiry services. This Comprehensive Telephone Directory must include all registered fixed and mobile telephony numbers. The telecommunications providers under the obligation should have kept a particular schedule and certain technical specifications in relation to the provisions of subscribers' details to OTE, which is the Universal Service Provider (USP). The drafting of the schedule and of the specifications had already been finalized from the end of 2003. However, the progress on issuing the Directory was not the expected one due to significant delays in the supply of information to the USP.

Trying to speed up the process EETT held a Hearing in March 2004 of the USP (i.e. OTE), the four MTOs (i.e. COSMOTE, Q-TELECOM, TIM HELLAS and VODAFONE) and a number of the alternative providers (i.e. ACN, ALGONET, FORTHNET, LANNET, TELEPASSPORT, TELLAS and VIVODI). The objective of this Hearing was

to ascertain any violation of the telecommunications legislation regarding the above mentioned issues. By applying the relevant legislation, EETT decided to take the following measures:

- To impose a fine of € 20,000 for violation of the telecommunications legislation on each one of the four MTOs and called upon them to immediately provide the USP with all the necessary information.
- To recommend to the USP and FORTHNET to avoid future actions which are not in line with the telecommunications legislation as well as to call upon FORTHNET to immediately provide the USP with the necessary information for issuing the Directory and providing directory enquiry service.
- To call upon all other alternative providers to supply the information related to subscriber numbers to the USP within the specified deadlines.

Facilities for Disabled People

EETT, in order to secure social cohesion, has recognized the importance of the participation of all citizens in the Information Society. Therefore, EETT has given particular emphasis on safeguarding the provision of telecommunication facilities for disabled people. It is noted that Greece is placed among those EU member states that have taken initiatives and have adopted suitable measures in the telecommunications services sector, in order to make easier the everyday life of disabled people.

In this context, EETT has examined the degree of compliance of the USP with the applicable special regulations for disabled people. Following a Hearing, EETT decided²⁶ in March 2004 that the USP failed to comply with all the aforementioned regulations and therefore was acting in violation of EETT Decision²⁷ in relation to the US content. As a result, EETT imposed a fine of €15,000.

²⁶ EETT Decision 308/44/2004 on the USP Hearing as of 12-09-03 on the ascertainment of violation of the EETT Decision 255/83/2002 "on the specification of the Universal Service Content" (GG Issue 874/B/12-07-2002)

²⁷ EETT Decision 255/83/2002 (GG Issue 874/B/12-07-2002).

Public Telephones

Regarding this issue, EETT was concerned about the refusal of the USP (i.e. OTE) to provide connections for the installation of public telephones by alternative providers. In this context, EETT held a Hearing of the USP in February 2004 and ascertained²⁸ that it was violating the telecommunications legislation and the law on competition. As a result, EETT imposed a fine of € 15,000 and invited the USP to avoid any actions that are not in line with the provisions of the telecommunications legislation.

4.6. Monitoring of the Telecommunications Market

EETT's actions in 2004 regarding the monitoring of the Greek market were focused on two directions. The first one was related to the collection, processing and analysis of data on the progress of the telecommunication market while the second was related to the gradual development of the organizational and technical infrastructure for the effective monitoring of the telecommunications sector. The importance of those mechanisms is highlighted in view of the new Regulatory Framework on Electronic Communications and the obligations arising regarding the analysis of individual markets in the sector for SMP evaluation.

EETT continued in 2004 to collect data from the telecommunications services providers with the use of detailed questionnaires and to assess the quality of provided data. These data formed the basis of EETT's contribution to the preparation of the European Commission annual report. Furthermore, the data were used for the provision of information on the evolution of the Greek electronic communications market to national and international bodies (i.e. the Ministry of Transportation and Communications (MTC), the EU Statistical Office (Eurostat), the Organization of Economic Cooperation and Development (OECD) and the

International Telecommunication Union (ITU)).

In addition a significant step towards the implementation of the necessary infrastructure for the monitoring of the market is the development of a database application (see subsection 8.3.1.) for organizing, processing and monitoring the data submitted by telecommunications providers to EETT.

4.7. Organization Plan of the Telecommunications Directorate

In 2004 an internal study was performed, on the "Organization Plan of the Telecommunications Directorate". The goal of the above project was to record the existing situation and optimize the organization of the Telecommunications Directorate of EETT, given the implementation of the Organizational chart and the undergoing recruitment of new staff.

In more detail, this study included:

- The operations and activities of the Directorate.
- The necessary organizational systems and means for carrying out these operations (regulations, procedures, standard forms, etc.).
- The information archives (electronic or physical) which are managed or are accessible by the Directorate for the effective performance of its operations.
- The organizational structure of the Directorate and the job description of each position, including the mission, the ranking framework, the main duties and the necessary qualifications of each personelle position.

For each organizational system and for each archive, the organizational unit is recorded together with the status (i.e. the improvements that may be necessary for their effective application and use). Finally, a specification of priorities and planning for the implementation or the integration of the organizational means and files is made.

²⁸ EETT Decision 325/269/30-07-2004.