

## ANNUAL REPORT 2003



**ΕΕΠΤ**

HELLENIC REPUBLIC  
NATIONAL TELECOMMUNICATIONS  
AND POST COMMISSION



**ANNUAL REPORT  
2003**

**Maroussi  
2004**



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NATIONAL TELECOMMUNICATIONS  
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## TABLE OF CONTENTS

|  |           |
|--|-----------|
| <b>Administration</b> .....  | <b>6</b>  |
| <b>Introduction by the President</b> .....                                 | <b>7</b>  |
| <b>Calendar</b> .....  | <b>8</b>  |
| <b>Introduction</b> .....  | <b>18</b> |
| <br>   |           |
| <b>I. Overview of Markets</b> .....  | <b>24</b> |
| 1.1. Telecommunications .....  | 25        |
| 1.1.1. Financial Data of Telecommunications Market .....                   | 25        |
| 1.1.2. Licensing .....   | 26        |
| 1.1.3. Fixed Voice Telephony .....   | 27        |
| 1.1.4. Mobile Telephony .....  | 35        |
| 1.1.5. Internet .....  | 40        |
| 1.2. Postal Services .....   | 41        |
| 1.2.1. Courier Services Market .....                                       | 41        |
| 1.2.2. Universal Service Mail Traffic .....                                | 45        |
| 1.2.3. Universal Service Tariffs .....                                     | 46        |
| <br>   |           |
| <b>2. Consumer Rights and Benefits</b> .....                               | <b>48</b> |
| 2.1. Consumer Protection and Information .....                             | 49        |
| 2.1.1. Consumer Service Sector .....                                       | 49        |
| 2.1.2. Information Leaflets .....  | 50        |
| 2.1.3. Control of Telecommunications Providers – Consumers Contracts ..... | 51        |
| 2.2. Telecommunications - Radio Communications .....                       | 52        |
| 2.2.1. Benefits from Competition .....                                     | 52        |
| 2.2.2. New Services .....  | 56        |
| Carrier Pre-Selection – Carrier Selection .....                            | 56        |
| Domain Names .....   | 57        |
| Universal Service .....  | 58        |
| 2.2.3. Broadband Services .....  | 58        |
| 2.2.4. Control of Antenna Installations – Interference Controls .....      | 59        |
| 2.2.5. Radio Equipment and Telecommunications Terminal Equipment .....     | 60        |
| 2.3. Postal Services .....   | 62        |
| 2.3.1. Universal Service – Courier Services .....                          | 62        |
| 2.3.2. Charter of Obligations to the Consumer .....                        | 63        |
| 2.3.3. Voucher (Accompanying Courier Note – Individual Agreement) .....    | 63        |
| 2.3.4. Postal Items Special -Track and Trace- System .....                 | 63        |
| 2.3.5. Benefits from Competition .....                                     | 64        |
| <br>   |           |
| <b>3. Telecommunications Sector</b> .....                                  | <b>66</b> |
| 3.1. Development of Modern Networks and Innovative Services .....          | 67        |
| 3.1.1. Completion of an Up to Date Regulatory Framework .....              | 67        |
| Completion of the Current Numbering Framework .....                        | 67        |
| Reformation of Pricing Regulation .....                                    | 67        |
| Licensing Status for Satellite Services Activation Points .....            | 68        |



|  |           |
|--|-----------|
| Virtual Providers Operational Framework  | 69        |
| Standing EETT Arbitration  | 69        |
| 3.1.2. Monitoring and Control Procedures for the Smooth Operation of the Telecommunications Market | 70        |
| Licensing  | 70        |
| Interconnection  | 70        |
| Leased Lines – Part Circuits   | 71        |
| ADSL Access (Bitstream Access)   | 71        |
| Price Control for OTE Cost-Oriented Services   | 71        |
| Framework Definition for Telecommunications Emergency Conditions                                   | 72        |
| 3.1.3. Internet – Electronic Transactions  | 73        |
| Domain Names with a [.gr] suffix   | 73        |
| Electronic Signature   | 74        |
| 3.2. Promotion of Competition in Networks and Services   | 75        |
| 3.2.1. Interventions based on the Framework in Force   | 75        |
| Organisations with Significant Market Power in the Mobile Telephony Market                         | 75        |
| Organisations with Significant Market Power in the Interconnection Market                          | 75        |
| OTE's 2003 Reference Interconnection Offer   | 79        |
| Bottom-Up Model Design for the OTE Network   | 80        |
| Bottom-Up Model Design for the Mobile Telephony Networks   | 82        |
| 3.2.2. Interventions based on the New Framework  | 82        |
| Market Analysis and Assessment of Significant Market Power in Relevant Markets                     | 82        |
| 3.2.3. Number Portability  | 83        |
| 3.2.4. Market Monitoring and Assessment of Competition Level                                       | 85        |
| 3.3. Safeguarding Competition  | 85        |
| Hearing concerning OTE Discount Packages on Voice Telephony  | 85        |
| OTE Hearing concerning the Provision of Local Loop Unbundling (LLU)                                | 87        |
| Hearing concerning the Adoption of Interim Measures against VODAFONE                               | 87        |
| Administrative Penalties to Telecommunications Providers during the Year 2003                      | 88        |
| <b>4. Radio Spectrum Sector</b>  | <b>90</b> |
| 4.1. Optimum Spectrum Usage  | 91        |
| 4.1.1. Completion of an Up to Date Regulatory Framework  | 91        |
| Regulation on Radio Frequency Usage Fees   | 91        |
| Channelisation   | 91        |
| 4.1.2. Frequency Assignment  | 92        |
| Terrestrial Microwave "Point-to-Point" Link Networks   | 92        |
| Fixed Satellite Services   | 93        |
| Private Mobile Radio Networks  | 93        |
| Support Services in the Transmission of Image and Sound  | 94        |
| 4.1.3. Antenna Licensing   | 94        |
| 4.1.4. Optimisation of Spectrum Management Mechanisms  | 95        |
| Update of the National Radio Frequencies Registry  | 95        |
| Integration of Frequency Assignment – Antenna Mast Construction Licences Data Bases                | 96        |
| Assignment Criteria Study  | 96        |



|   |            |
|---|------------|
| 4.2. Ensuring the Radio Spectrum Legal Use  | 97         |
| 4.2.1. Radio Spectrum Monitoring  | 97         |
| 4.2.1.1. Protection of High Priority Networks   | 97         |
| Civil Aviation Authority Networks   | 97         |
| Other High Priority Networks  | 97         |
| 4.2.1.2. Recording & Control of Radio Transmissions Technical Characteristics               | 98         |
| Mount Hymettus Broadcasting Center  | 98         |
| Remaining Country   | 98         |
| 4.2.1.3. Private Mobile Radio Networks  | 99         |
| 4.2.1.4. Complaints/ Interferences Management   | 99         |
| 4.2.1.5. Administrative – Penal Sanctions   | 101        |
| 4.2.2. Organisational Infrastructure  | 102        |
| 4.2.3. Installation of Technical Equipment  | 102        |
| 4.3. Placing on the Market and Use of Telecommunications Equipment                          | 102        |
| 4.3.1. Completion of an Up to Date Regulatory Framework                                     | 102        |
| Regulation on the Notification of Radio Equipment to EETT                                   | 103        |
| Notified Bodies Regulation  | 103        |
| Regulation on the Publication of Technical Interfaces of Public Telecommunications Networks | 103        |
| 4.3.2. Notifications Management   | 104        |
| 4.3.3. Market Surveillance  | 104        |
| 4.3.4. Participation in International Committees/ Groups                                    | 105        |
| 4.4. Procurement of National Spectrum Management and Monitoring System                      | 105        |
| 4.5. Internal Organisation of Spectrum Management Directorate                               | 106        |
| 4.5.1. Organisational Study of Spectrum Management Directorate                              | 106        |
| 4.5.2. Establishment of Regional Office in Thessalonica                                     | 107        |
| <b>5. Olympic Games: Effective Management of Radio Communications</b>                       | <b>108</b> |
| 5.1. Assignment of 2G Mobile Telecommunications Spectrum                                    | 109        |
| 5.2. Frequency Assignment   | 109        |
| 5.3. Spectrum Monitoring Preparation for the Olympic Games Needs                            | 110        |
| 5.4. Planning for the Use of Radio Equipment  | 111        |
| 5.5. Cooperation with Other Bodies  | 111        |
| <b>6. Postal Services Sector</b>  | <b>114</b> |
| 6.1. Promotion of Gradual and Controlled Liberalisation                                     | 115        |
| 6.1.1. Completion of an up to Date Regulatory Framework                                     | 115        |
| 6.1.1.1. Market Liberalisation  | 115        |
| 6.1.1.2. Regulation on Granting General Authorisations                                      | 115        |
| 6.1.1.3. Regulation on Granting Individual Licences   | 117        |
| 6.1.1.4. Regulation on the Cost Accounting System of the Universal Service Provider         | 117        |
| 6.1.1.5. Regulation on the Pricing of Universal Services                                    | 118        |
| 6.1.1.6. Drafting of Regulations on the Monitoring and Controlling Role of EETT             | 118        |
| 6.1.2. Market Monitoring and Control  | 118        |
| Data Collection System  | 118        |
| Monitoring and Control of the Courier Services Sector                                       | 118        |
| Statistical Data on Market Monitoring during 2000 - 2003                                    | 119        |



|   |            |
|---|------------|
| Administrative Penalties in Postal Undertakings during the Year 2003      | 120        |
| 6.2. Universal Service Quality Measurement                                | 121        |
| 6.2.1. Universal Service Quality Standards                                | 121        |
| 6.2.2. Universal Service Quality Measurement Results                      | 122        |
| 6.3. Introduction of Quality Rules for Courier Services                   | 123        |
| <b>7. The National Telecommunications and Post Commission (EETT)</b>      | <b>124</b> |
| 7.1. Structure and Framework of EETT Internal Organisation                | 125        |
| 7.1.1. EETT Organisational Structure                                      | 125        |
| 7.1.1.1. Implementation of Organisational Chart                           | 125        |
| 7.1.2. Staffing and Training  | 126        |
| 7.1.3. Support Mechanisms   | 127        |
| Electronic Protocol System  | 127        |
| New Payroll System  | 127        |
| New Payroll and Human Resources Management System                         | 127        |
| Design of Templates for Contracts and Invitations to Tender               | 127        |
| 7.2. Information Society  | 128        |
| 7.3. EETT Business Plan 2003 - 2005                                       | 129        |
| 7.4. International Relations  | 130        |
| 7.4.1. European Union   | 130        |
| New Regulatory Framework  | 130        |
| European Committees / Groups  | 130        |
| ERG   | 131        |
| IRG   | 131        |
| 9 <sup>th</sup> Report  | 131        |
| 7.4.2. EETT Participation in International Bodies                         | 132        |
| 7.4.3. International Collaborations                                       | 132        |
| 7.4.4. Organisation of IRG/ ERG Summits                                   | 133        |
| 7.5. Conference "Telecommunications: Three Years of Liberalisation"       | 133        |
| 7.6. Information Systems  | 134        |
| 7.6.1. Expert Study on the Integrated Information System                  | 134        |
| 7.6.2. Development of Support Applications                                | 135        |
| 7.6.3. EETT Website   | 136        |
| 7.6.4. EETT Intranet  | 137        |
| 7.7. Financial Statements   | 139        |
| <b>8. Goals</b>   | <b>140</b> |
| <b>Appendices</b>   | <b>144</b> |
| I. Greek Legislative – Regulatory Framework                               | 145        |
| II. European Union Regulatory Framework for the Telecommunications Sector | 150        |
| III. List of Undertakings Licensed to Provide Telecommunications Services | 152        |
| IV. Codification of Telecommunications Services                           | 168        |
| V. List of Undertakings Licensed to Provide Postal Services               | 173        |
| VI. EETT Website Map  | 185        |
| VII. Abbreviations Table  | 186        |



## Administration

The present Annual Report refers to the activities of EETT during the period from January 1<sup>st</sup> to December 31<sup>st</sup> 2003.



During this period, the composition of EETT was as follows:

**EMMANOUIL GIAKOUMAKIS**  
PRESIDENT

**DIMITRIOS DIMITROPOULOS**  
VICE-PRESIDENT FOR THE SECTOR  
OF TELECOMMUNICATIONS

**ARISTIDES MANTAS**  
VICE-PRESIDENT FOR THE SECTOR  
OF POSTAL SERVICES

**DIMITRIOS ZACHARIADIS**  
MEMBER (Jan. - Aug. 2003)

**EMMANOUIL KONDYLIS**  
MEMBER

**NIKOLAOS KOULOURIS**  
MEMBER (Aug. - Dec. 2003)

**VASSILIOS MAGLARIS**  
MEMBER

**PANAYIOTIS POULIS**  
MEMBER (Aug. - Dec. 2003)

**FILIPPOS SPYROPOULOS**  
MEMBER

**CHARISSIOS TAGARAS**  
MEMBER (Jan. - Aug. 2003)

**DIMITRIOS CHRYSOULIDIS**  
MEMBER



## Introduction by the President

With its Annual Report, EETT informs the State's competent bodies, the market and the consumers on its proceedings. Despite the fact that EETT is a relatively newly-established institution, the work presented in the report at hand, pleasantly confirms that our country has a dynamic and reliable regulatory and supervisory authority for the sectors of telecommunications and postal services, which produces work, significant in volume and quality, to the benefit of the consumer, the market and the society.

The progress achieved due to the liberalisation that has taken place, has shaped a new perception of consumers' role. Consumers' position in the market has been strengthened. Consumers have gained market awareness, they make comparisons and they claim their rights. They now have the choice among services and providers, according to their personal needs. EETT, in order to support the consumer in this new dynamic environment, has established the proper mechanisms, so that it can rapidly manage consumer complaints, defend their interests and inform them in an adequate manner so that they can make the choices that are most advantageous for them.

An indication of the positive results produced by our regulatory and supervisory policy is the course of the Consumer Price Index for Communications, which during the last four years exhibits a negative trend.

During the past year, EETT set as a high priority the definition of a concrete, complete and stable regulatory framework for the operation of markets, as well as the timely control intervention in order to ensure that the aforementioned framework is upheld. This framework contributed to the establishment of a unified European environment and further development of competition in the telecommunications market.

During the past year, among EETT's significant interventions were the new framework for the management of Domain

Names with a [gr] suffix, the new Regulations for the operation of Electronic Signature and the actions so as the implementation of Number Portability begins. These interventions are expected to substantially invigorate the market of electronic communications and bring additional benefits to consumers.

EETT proceeded to the necessary actions in order to complete the procurement and installation of the National Spectrum Management and Monitoring System (NSMMS). Furthermore, EETT established the proper administrative mechanism for controlling the radio spectrum illegal use, aiming to protect legal users and optimise the use of the scarce national resource of radio frequencies. This infrastructure will support us in responding successfully to the particularly increased demands for a proper electromagnetic environment, during the 2004 Olympic Games.

In the postal market, EETT ensured conditions of smooth undertakings' operation under the status of liberalisation and introduced quality rules aiming to improve the services provided.

Our goal for the future is, also in accordance with the new community framework on electronic communications, to provide consumers with the best possible services in the most competitive prices, promote electronic transactions and broadband access, develop and fully exploit a modern and efficient mechanism for radio spectrum management and monitoring and finally, ensure a reliable and safe radio communications environment, during the ATHENS 2004 Olympic Games.

Emmanouil A. Giakoumakis  
EETT President

Maroussi, March 2004



## CALENDAR

### January

- ☑ Issue of Regulation of EETT on the Procedure for the Adoption of Interim Measures.
- ☑ Approval to lease the Licence for Fixed Wireless Access (FWA) from EUROPROM TELECOMMUNICATIONS S.A. to STET HELLAS S.A.
- ☑ Commencement of Public Consultation on the Determination of Parties under Obligation to provide Universal Service (US) and Cost Allocation Mechanisms.
- ☑ Issue of Decisions: a) assigning 44 frequencies for "Point-to-Point" links, b) granting 137 Antenna Mast Construction Licences and rejecting 42 applications, c) approving 9 Licences for Private Mobile Radio (PMR) Networks.
- ☑ Issue of Decisions approving 1,555 applications for the assignment of Domain Names with a [.gr] suffix.
- ☑ Issue of Decisions approving 12 applications for the assignment of numbers from the National Numbering Plan (NNP).

### February

- ☑ Revocation of the Individual Licence of ECONOPHONE HELLAS S.A. and expulsion of the undertaking in question from the relevant Individual Licences Registry of EETT.
- ☑ Issue of Decision on the integration of the Provision of Satellite Internet Services in the status of General Authorisations.
- ☑ Designation of Organisations with Significant Market Power in the National Interconnection Market of public telecommunications networks, as well as definition of their obligations.
- ☑ Issue of Regulation on the NNP short codes Management for the provision of catalogue information services.

- ☑ Issue of Regulation on the NNP routing number Management.
- ☑ Issue of Regulation on the information provision to consumers regarding the fees for Audiotext and Short Message Services (SMS) added value services.
- ☑ Issue of Regulation on the cost control and time schedule procedures for the implementation of tariffs by providers of telecommunication services or/and networks.
- ☑ Issue of Regulation on the determination of spectrum usage fees and radio frequency assignment fees.
- ☑ Issue of Regulation on the control procedures and the publicity obligations concerning the tariffs of telecommunication services or/and networks providers.
- ☑ Execution of agreement for an Organisational, Planning and Implementation Study on the Voluntary Accreditation of Certification Services Providers & other issues relevant to the Provision of Electronic Signature Certification Services.
- ☑ Execution of agreement for the Study on the "Evaluation of the Level of Competition in the market of call termination from fixed to mobile networks – Regulatory interventions in the context of the new Regulatory Framework of the European Union (EU)".
- ☑ Granting to NEWSPHONE HELLAS S.A. an Individual Licence for the Provision of Voice Telephony Services.
- ☑ Evaluation of new tariffs of Hellenic Post S.A. (ELTA) as a Universal Service Provider (USP).
- ☑ Granting to STET HELLAS S.A. of an Individual Licence for the provision of voice telephony services.
- ☑ Issue of Decision concerning the submitted tariffs for basic rate ISDN connections by the Hellenic Telecommunications Organisation S.A. (OTE).
- ☑ Issue of cost control results on the tariffs for Fully Unbundled and Shared Access to OTE's Local Loop.

- ☑ Issue of Decisions on Hearings concerning the provision of postal services without a General Authorisation: a) I for the Undertaking OSLANITIS CHRISTOS, b) I for the Undertaking YDRAIOU – MITZELOU ELENI, c) I for the Undertaking SOURETIS MENELAOS and d) I for the Undertaking TSOLIANOS DIMITRIOS.
- ☑ Issue of Decision on the 19-12-2002 Hearing of FORTHNET S.A., concerning violation of provisions on competition and more specifically on undertakings' concentrations.
- ☑ Issue of Decision on the 27-11-2002 Hearing of FORTHNET S.A., concerning the illegal installation of an antenna mast construction, by which the undertaking was acquitted.
- ☑ Issue of Decision on the 02-12-2002 Hearing of VODAFONE, regarding the level of upholding its obligations as an Organisation with Significant Market Power in the Market of mobile telephony public networks and services.
- ☑ Issue of Decision on the 02-12-2002 Hearing of COSMOTE S.A., regarding the level of upholding its obligations as an Organisation with Significant Power in the Market of mobile telephony public networks and services.
- ☑ Issue of Decision on the Hearing of OTE concerning the cost-oriented pricing of the deduction charge for calls that initiate from OTE's fixed network and terminate in other telecommunications providers of fixed or/and mobile telecommunications networks.
- ☑ Issue of Decisions on Hearings for illegal installation of 3 mobile telephony antenna mast constructions: a) I by COSMOTE S.A., b) I by VODAFONE, and c) I by STET HELLAS S.A.
- ☑ Issue of Decision on the 04-12-2002 Hearing of ELTA on the inefficient provision of US.
- ☑ Issue of Decision on the 10-12-2002 Hearing of INTRACONNECT S.A., for the illegal installation of an antenna mast construction.

- ☑ Issue of Decisions: a) assigning 414 frequencies for "Point-to-Point" links, b) granting 50 Antenna Mast Construction Licences and rejecting 19 applications, c) approving 2 Licences for PMR Networks and rejecting 1 application.
- ☑ Issue of Decisions approving 10 applications for the assignment of numbers from the NNP.
- ☑ Issue of Decisions approving 1,399 applications for the assignment of Domain Names with a [.gr] suffix.

### March

- ☑ Granting of an Individual Licence for the provision of voice telephony services to PREMIUM SERVICES HELLAS S.A.
- ☑ Approval and issue of OTE's Reference Interconnection Offer (RIO) for the year 2003.
- ☑ Designation of Organisations with Significant Market Power in the Market of mobile telecommunications public networks and services.
- ☑ Issue of Regulation on the designation of Providers as Notified Bodies for Radio and Telecommunications Terminal Equipment issues (RTTE).
- ☑ Execution of agreement between EETT and ROHDE & SCHWARZ GmbH & Co.KG, contractor of the first phase of the National Spectrum Management and Monitoring System project (NSMMS).
- ☑ Execution of agreement for the procurement of two Fixed radio spectrum Monitoring Stations.
- ☑ Issue of Decision on the 18-09-2002 Hearing of OTE, concerning violations of the telecommunications legislation and the provisions on competition during the provision of Unbundled Access to the Local Loop.
- ☑ Issue of Decision on the 04-02-2003 Hearing of OTE for the illegal installation of an antenna mast construction, by which a fine was imposed.
- ☑ Issue of Decisions on Hearings for the illegal installation of mobile telephony antenna mast



constructions: a) 1 by COSMOTE S.A., b) 1 by VODAFONE and c) 2 by STET HELLAS S.A.

- ☑ Issue of Decisions on the 31-01-2003 Hearings, concerning the provision of postal services without a General Authorisation: a) 1 for the Undertaking GARELIS IOANNIS, b) 1 for the Undertaking KORONAIOS CHRYSOSTOMOS, c) 1 for the Undertaking TRIKKAS G. & CO, and d) 1 for the Undertaking MICHAILIDI BROS G.P.
- ☑ Issue of Decision on the 23-01-2003 Hearing of IDEAL TELECOM S.A., for the violation of provisions concerning the transfer of company capital of a provider granted an Individual Licence.
- ☑ Issue of Decision on the 24-02-2003 Hearing of ATTIKES TELECOMMUNICATIONS S.A., for the violation of provisions concerning the transfer of company capital of a provider granted of an Individual Licence.
- ☑ Issue of Decision on the 03-02-2003 Hearing of ALGONET S.A., for the violation of provisions concerning the transfer of company capital of a provider granted of an Individual Licence.
- ☑ Issue of Decisions: a) assigning 74 frequencies for "Point-to-Point" links, b) granting 62 Antenna Mast Construction Licences and rejecting 27 applications, c) approving 5 Licences for PMR Networks.
- ☑ Issue of Decisions approving 1,269 applications for the assignment of Domain Names with a [.gr] suffix.
- ☑ Issue of Decisions approving 6 applications for the assignment of numbers from the NNP.

#### **April**

- ☑ Granting of an Individual Licence to R.G. COMMUNICATIONS S.A. for the provision of voice telephony services.

- ☑ Amendment of OTE's Individual Licence, concerning provided satellite services.
- ☑ Issue of Decision on the application for the transfer of the Individual Licence for installation, operation and exploitation of public wire telecommunications network and for provision of voice telephony services by DEH TELECOMMUNICATIONS S.A. to TELLAS S.A.
- ☑ Adoption of Interim Measures against OTE, regarding the provision of Leased Lines to TELEDOME S.A., following a request by the latter Undertaking.
- ☑ Adoption of Interim Measures, following an Application of G.T. - GREEK TELECOM S.A., against OTE, in continuance to the relevant Hearing on the 21-03-2003.
- ☑ Issue of Regulation on the procedure of drafting the catalogue of Arbitrators in the Standing EETT Arbitration.
- ☑ Issue of Decision on the 23-12-2002 Hearing of OTE, concerning the provision of discount packages during the Christmas period.
- ☑ Issue of Decisions on Hearings for the illegal installation of 6 mobile telephony antenna mast constructions: a) 2 by COSMOTE S.A., and b) 4 by VODAFONE.
- ☑ Issue of EETT's Balance sheet for the year 2002.
- ☑ Issue of Decision on the Hearings of 10-09-2002, 02-10-2002, 25-11-2002 and 10-01-2003, concerning the dispute between TELEDOME S.A. and OTE.
- ☑ Issue of Decision on the 04-02-2003 Hearing of ELTA, for the provision of low quality US during the 1<sup>st</sup> semester of 2002, by which a fine of 220,000 euros was imposed.
- ☑ Issue of Decisions: a) assigning 350 frequencies for "Point-to-Point" links, b) granting 41 Antenna Mast Construction Licences and rejecting 11 applications, c) approving 17 Licences for PMR Networks.

- ✓ Issue of Decisions approving 1,209 applications for the assignment of Domain Names with a [.gr] suffix.
- ✓ Issue of Decisions approving 19 applications for the assignment of numbers from the NNP.

## May

- ✓ Organisation of Plenary Session Summits of the Presidents of IRG (Independent Regulators Group) and ERG (European Regulators Group) in Athens on the 19<sup>th</sup> and the 20<sup>th</sup> of May 2003.
- ✓ Amendment of the Individual Licence that had been granted to UNITEL HELLAS S.A., for the installation, operation, management and exploitation of a satellite network and the provision of satellite communications services.
- ✓ Revocation of the Individual Licence of TYCOM NETWORKS S.A. and its expulsion from EETT's relevant Registry.
- ✓ Designation of EMC HELLAS S.A., as a Notified Body for issues concerning the evaluation of conformity of RTTE.
- ✓ Approval of Draft Radio Interfaces for acoustic frequencies broadband links, radio telephone devices, transmitters and receivers of maritime mobile service, port systems and UHF telecommunications equipment.
- ✓ Issue of Decision on the 02-08-2002 Application for resolution of the Interconnection Dispute between OTE and INFO QUEST S.A.
- ✓ Issue of Decision on Hearings for the illegal installation of 14 mobile telephony antenna mast constructions: a) 6 for COSMOTE S.A., b) 7 for VODAFONE, and c) 1 for STET HELLAS S.A.
- ✓ Adoption of Interim Measures against OTE, concerning the new discount packages on voice telephony.
- ✓ Issue of Decision on the 29-08-2002 Hearing of OTE, concerning the violation of the provisions regarding the collection of fees for the operation of PMR Networks.
- ✓ Issue of Decision on the 21-05-2003 Hearing, following an Application for the adoption of Interim Measures by RADIO GOLD – RADIO MUSIC SOCIETE ANONYME, against the Public Law Legal Entity IERA MITROPOLI PIRAEUS, owner of the radio station of the Church of Piraeus.
- ✓ Issue of Decision on the 17-02-2003 Hearing of OTE, concerning the unified telephone catalogues.
- ✓ Issue of Decision on the 17-02-2003 Hearing of COSMOTE S.A., STET HELLAS S.A., Q-TELECOM and VODAFONE, concerning the unified telephone catalogues.
- ✓ Issue of Decision on the 21-03-2003 Hearing of the Company ELTA COURIER S.A., concerning the inefficient provision of postal services.
- ✓ Issue of Decisions on the 21-04-2003 Hearings, concerning the provision of postal services without General Authorisation: a) 1 for the Undertaking SECURICON LTD., b) 1 for the Undertaking TERZI MARIA & CO., c) 1 for the Undertaking PAPADIMITRIOU EFSTRATIOS, and d) 1 for the Undertaking MARLAGOUTSOS DIMITRIOS.
- ✓ Issue of Decisions a) assigning 854 frequencies for "Point-to-Point" links and rejecting 1 application, b) granting 84 Antenna Mast Construction Licences and rejecting 15 applications, c) approving 9 Licences for PMR Networks and rejecting 1.
- ✓ Issue of Decisions approving 1,341 applications for the assignment of Domain Names with a [.gr] suffix.
- ✓ Issue of Decisions approving 13 applications for the assignment of numbers from the NNP.



## June

- ☑ EETT's visit to the Regulatory Authority of Romania (National Regulatory Authority for Communications - ANRC).
- ☑ Granting of an undisposed Licence for Fixed Wireless Access (Licence IV) in the frequency area 3,459 - 3,473 GHz and 3,529 - 3,573 GHz.
- ☑ Definition of the necessary criteria for the evaluation of the USP tariffs (ELTA).
- ☑ Participation of EETT in the Public Consultation of the Ministry of Transportation and Communication (MTC), concerning the Bill on Electronic Communications.
- ☑ Adoption of Interim Measures against OTE, concerning the provision of Leased Lines to ALGONET S.A., following a demand of the latter.
- ☑ Issue of Decision on the 22-04-2003 Hearings of OTE, for illegal installation of antenna mast constructions in the positions "Koletti", "Nima" and "Psalidi", by which a fine was imposed.
- ☑ Issue of Decision on Hearings for the illegal installation of 6 mobile telephony antenna mast constructions: a) 1 for COSMOTE S.A., b) 1 for VODAFONE, and c) 4 for STET HELLAS S.A.
- ☑ Issue of Decision on the 22-04-2003 Hearing of ANTENNA SATELLITE S.A., for the illegal installation of an antenna mast construction, by which a fine was imposed.
- ☑ Issue of Decision on the 21-04-2003 Hearing of ELTA, following a denunciation by Undertakings, concerning the loss of a postal item.
- ☑ Issue of Decision on the 04-04-2003 Hearing, concerning the provision of postal services by the Undertaking EXECUTIVE MOTO without General Authorisation.
- ☑ Issue and distribution of the information leaflet "Now consumers can choose".
- ☑ Issue of Decisions a) assigning 227 frequencies for "Point-to-Point" links and rejecting 2 applications,

b) granting 68 Antenna Mast Construction Licences and rejecting 15 applications, c) approving 19 Licences for PMR Networks and rejecting 2 applications.

- ☑ Issue of Decisions approving 106 applications for Domain Names with a [.gr] suffix.
- ☑ Issue of Decisions approving 9 applications for the assignment of numbers from the NNP.

## July

- ☑ Adoption of Interim Measures concerning the suspension of services by OTE to INTRACONNECT S.A.
- ☑ Granting of an Individual Licence to TELLAS S.A. for the Installation, Operation and Exploitation of a public wire network and the provision of voice telephony services.
- ☑ Amendment of the Individual Licence granted to MEDITERRANEAN NAUTILUS GREECE S.A., for the installation, operation and exploitation of a public wire telecommunications network.
- ☑ Amendment of Individual Licence granted to UNITEL HELLAS S.A. for the installation, operation, management and exploitation of a satellite network and the provision of satellite communications services.
- ☑ Revocation of the Individual Licences of CONVERGENCE VENTURE LIMITED.
- ☑ Execution of agreement for the "Cost-orientation control of OTE tariffs, for the services of Voice Telephony, Leased Lines, Interconnection and Local Loop Unbundling" project.
- ☑ Execution of agreement for the development, installation and maintenance project of the National Portability Report Database (NPRD), as well as its operation and management for 5 years.

- ✓ Execution of agreement for the project of development, installation, operation and management of the Domain Names with a [.gr] suffix Registry System.
- ✓ Issue of Decision concerning OTE's discount packages on voice telephony.
- ✓ Issue of Decision on the 30-05-2003 Hearing concerning the provision of postal services without General Authorisation, by the undertaking DORLI EYGENIA.
- ✓ Issue of Decisions on Hearings for the illegal installation of 7 mobile telephony antenna mast constructions: a) 1 for COSMOTE S.A., b) 3 for VODAFONE, and c) 3 for STET HELLAS S.A.
- ✓ Issue of Decision on the Hearing of ELTA, following a denunciation by consumers concerning the inefficient provision of postal US.
- ✓ Issue of Decisions a) assigning 246 frequencies for "Point-to-Point" links and rejecting 3 applications, b) granting 44 Antenna Mast Construction Licences and rejecting 9 applications, c) approving 11 Licences for PMR Networks and rejecting 2 applications.
- ✓ Issue of Decisions approving 1,151 applications for the assignment of Domain Names with a [.gr] suffix.
- ✓ Issue of Decisions approving 14 applications for the assignment of numbers from the NNP.

## August

- ✓ Granting of an Individual Licence to VODAFONE, for the provision of public mobile telecommunications services of Wireless Local Area Networks (W-LAN).
- ✓ Granting of an Individual Licence to HO2.KOM SOCIETE ANONYME FOR THE PROVISION OF TELECOMMUNICATIONS SERVICES, for the provision of voice telephony services.
- ✓ Issue of Decision on the 17-06-2003 Hearing, concerning the 02-08-2002 Application to resolve

the Interconnection Dispute between OTE and INFO QUEST S.A.

- ✓ Issue of Decision on the 10-01-2003 Hearing of OTE, following a denunciation by FORTHNET S.A., concerning the refusal of OTE to activate a wireless link in the framework of Interconnection and Unbundled Access to the Local Loop.
- ✓ Issue of Decision on the 26-06-2003 Hearing of the Association of Professional Radio Taxis "RADIOTAXI HELLAS", concerning the use of unassigned frequencies.
- ✓ Issue of Decision on the 09-05-2003 Hearing of GENIKI POSTAL S.A. COURIERS, following a denunciation by ELTA, concerning the infringement of the latter's exclusive rights as a USP.
- ✓ Issue of Decision on the 16-04-2003 Hearing, concerning the provision of postal services without General Authorisation by the Undertaking PAPASTOUGIANNIDIS CHRISTOS.
- ✓ Issue of Decisions a) assigning 370 frequencies for "Point-to-Point" links and rejecting 5 applications, b) granting 18 Antenna Mast Construction Licences and rejecting 1 application, c) approving 3 Licences for PMR Networks.
- ✓ Issue of Decisions by which 757 applications for the assignment of Domain Names with a [.gr] suffix were approved.
- ✓ Issue of Decisions approving 4 applications for the assignment of numbers from the NNP.

## September

- ✓ Participation in the Mediterranean Telecommunications Forum for issues of Regulatory Policy and Investments in Rome, on the 18<sup>th</sup> and 19<sup>th</sup> of September 2003 and in the International Forum of Regulatory Activities in the Telecommunications Sector, in Montenegro on the 29<sup>th</sup> and 30<sup>th</sup> of September 2003.



- ✓ Participation in an ERG Summit and an IRG Summit in Brussels on the 24<sup>th</sup> and 25<sup>th</sup> of September 2003.
  - ✓ Issue of Decision on the designation of undertakings under Obligation to provide US, concerning electronic communications networks and services.
  - ✓ Commencement of Public Consultation concerning the definition of the mobile call termination market.
  - ✓ Commencement of Public Consultation for the project "Drafting of Action Plans for Emergency Conditions in Telecommunications".
  - ✓ Issue of Decision on the 08-11-2002 Hearing of COSMOTE S.A., regarding issues of NNP's short codes for the services of telephony and mobile and personal communications.
  - ✓ Issue of Decision on the 20-01-2003 Hearing of OTE for the illegal installation of Wireless Station in the position "Profitis Ilias" (Thira).
  - ✓ Issue of Decision on the 17-06-2003 Hearing of HELLENIC RADIO-TELEVISION S.A. for the illegal installation of a Tower in the position "Profitis Ilias" (Thira).
  - ✓ Issue of Decisions on Hearings concerning the illegal installation of 5 mobile telephony antenna mast constructions by COSMOTE S.A.
  - ✓ Issue of Decision on the 20-06-2003 Hearing to determine the compatibility of the services provided by FOKOS D. LEONARDOU A. S.A. with the type of Licence that had been granted to it.
  - ✓ Issue of Decisions a) assigning 37 frequencies for "Point-to-Point" links and rejecting 5 applications, b) granting 67 Antenna Mast Construction Licences, c) approving 5 Licences for PMR Networks and rejecting 15 applications.
  - ✓ Issue of Decisions approving 1,403 applications for the assignment of Domain Names with a [.gr] suffix.
  - ✓ Issue of Decisions approving 3 applications for the assignment of numbers from the NNP.
- ### October
- ✓ Organisation of the 1<sup>st</sup> Summit of IRG and the Regulatory Authorities of Southeastern Europe (Bulgaria, Romania, Turkey) in Athens, on the 3<sup>rd</sup> October 2003.
  - ✓ Issue of Regulation on the publication of public telecommunications networks technical interfaces.
  - ✓ Issue of Regulation on the definition of Designated Bodies to ascertain the compliance of secure signature creation devices and secure cryptographic units, and to ascertain the compliance of Certification Services Providers (CSPs) to the criteria of Voluntary Accreditation.
  - ✓ Issue of Regulation on the control of compliance of secure signature creation devices and secure cryptographic units.
  - ✓ Issue of Regulation on the Voluntary Accreditation of CSPs.
  - ✓ Issue of Regulation on the Radio equipment Notification to EETT.
  - ✓ Issue of Regulation on the Postal Services General Authorisations.
  - ✓ Issue of Regulation on the authorisation of bodies as Inmarsat Services Activation Points (PSA).
  - ✓ Commencement of Public Consultation on the operation and use of GSM-Gateways in the Greek telecommunications market.
  - ✓ Adoption of Interim Measures against VODAFONE, concerning the new commercial packages for telecommunication providers, following a denunciation by TELEPASSPORT (HELLAS) S.A., TELEDOME S.A., FORTHNET S.A., LAN-NET S.A., NET ONE S.A., ALGONET S.A. and VIVODI TELECOMMUNICATIONS S.A.
  - ✓ Issue of Decision for the temporary distribution of

DCS 1800 spectrum to the mobile telephony providers in order to cover the needs of the Olympic Games.

- ☑ Issue of Decision on the 28-07-2003 Hearing of OTE and ALGONET S.A., concerning the Provision of Leased Lines by OTE.
- ☑ Issue of Decision on the 28-07-2003 Hearing of OTE and INTRACONNECT S.A., concerning violations of telecommunication legislation and competition.
- ☑ Issue of Decisions on Hearings for the illegal installation of 11 mobile telephony antenna mast constructions: a) 4 for COSMOTE S.A., b) 4 for VODAFONE, and c) 5 for STET HELLAS S.A.
- ☑ Issue of Decision on the 13-12-2002 Hearing of VODAFONE, concerning issues of the NNP's short codes for the telephony services of both mobile and personal communications.
- ☑ Issue of Decision on the 09-05-2003 Hearing of SPEDEX SOCIETE ANONYME COURIER SERVICES AND A.C.S. INTERNATIONAL TRANSPORTATIONS AND FACILITATIONS S.A., following a denunciation by ELTA, regarding the use of Postal Code.
- ☑ Issue and distribution of the leaflet "Before you talk on the phone... listen to what we have to tell you".
- ☑ Issue of Decisions a) assigning 658 frequencies for "Point-to-Point" links and rejecting 8 applications, b) granting 44 Antenna Mast Construction Licences and rejecting 14 applications, c) approving 10 Licences for PMR Networks.
- ☑ Issue of Decisions approving 1,461 applications for the assignment of Domain Names with a [.gr] suffix.
- ☑ Issue of Decisions approving 11 applications for the assignment of numbers from the NNP.

## November

- ☑ Participation in the Plenary Session Summit of the IRG and ERG Presidents in Budapest, on the 20<sup>th</sup> and 21<sup>st</sup> of November, 2003.
- ☑ Granting of an Individual Licence of Virtual Provider to WEB COMMUNICATIONS LTD., for the provision of fixed voice telephony.
- ☑ Issue of 2003 OTE cost control results, concerning the services under regulation.
- ☑ Commencement of Public Consultation on the Channelisation of Radio Frequency Bands for use by the Fixed Service of Wireless Communication, for the digital transmission of data, or even for the transmission of analogue image and sound signals.
- ☑ Commencement of Public Consultation on the implementation of the EETT Integrated Information System (IIS).
- ☑ Issue of Decision on the 19-09-2003 Hearing, concerning the provision of postal services without General Authorisation, by FLASH RUNNER COURIER LTD.
- ☑ Issue of Decision on the 19-09-2003 Hearing, following a denunciation made by a consumer, concerning the inefficient provision of postal services by the Undertaking D. KAPELAKIS – B. MPARDAKIS.
- ☑ Issue of Decision on the 03-09-2003 Hearing, following a denunciation made by consumers, concerning the provision of postal services without General Authorisation, by the Undertaking KADITIS KONSTANTINOS.
- ☑ Adoption of Interim Measures regarding the dispute between OTE and INTRACONNECT S.A.
- ☑ Approval of EETT's budget for 2004.
- ☑ Issue of Decision on the 28-07-2003 Hearing of OTE, concerning the violation of telecommunications legislation and especially of the Regulation for the Management of NNP's short codes.

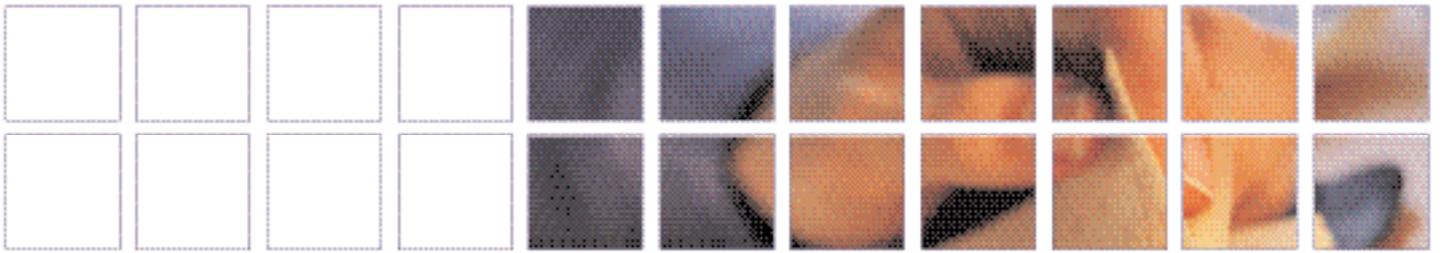
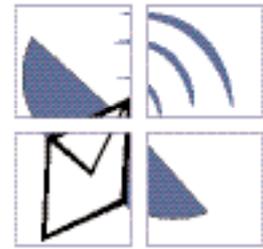


- ☑ Issue and distribution of the leaflet "Universal Postal Service... Courier Services... Lets get informed".
- ☑ Issue of Decisions a) assigning 5 frequencies for "Point-to-Point" links and rejecting 2 applications, b) granting 50 Antenna Mast Construction Licences and rejecting 15 applications, c) approving 4 Licences for PMR Networks and rejecting 1 application.
- ☑ Issue of Decisions approving 1,390 applications for the assignment of Domain Names with a [.gr] suffix.
- ☑ Issue of Decisions approving 6 applications for the assignment of numbers from the NNP.

**December**

- ☑ Organisation of Conference with the topic "Telecommunications: Three Years of Liberalisation" on the 10<sup>th</sup> of December 2003.
- ☑ Establishment and Organisation of Regional EETT Office in Thessalonica.
- ☑ Issue of Regulation on Individual Licences for the provision of postal services.
- ☑ Issue of Regulation on the determination of objective costing methods applied to the USP accounting system.
- ☑ Regulation on the determination of objective costing methods that are applied to the USP accounting system.
- ☑ Regulation on Microcell Antenna Systems for which no Licence is required.
- ☑ Amendment of Regulation on the Management of NNP's short codes for the provision of catalogue information services.
- ☑ Amendment of Regulation on the Integration of Number Portability in the Greek market.
- ☑ Approval of Draft Technical Interfaces for maritime telecommunications equipment.
- ☑ Completion of the OTE 2003 cost control (based on the 2001 actual data) – Approval of final results.
- ☑ Issue of Decision on the Proposal of OTE concerning its new pricing policy in fixed voice telephony during 2003.
- ☑ Issue of Decision on the 25-08-2003 Hearing of OTE, concerning the violation of the telecommunications legislation and especially of the Regulation on the Management of the NNP's short codes.
- ☑ Issue of Decisions on Hearings for the illegal installation of mobile telephony antenna mast construction: a) 9 by COSMOTE S.A., b) 2 by VODAFONE, and c) 2 by STET HELLAS S.A.
- ☑ Issue of Decisions on Hearings on the 19-09-2003, concerning the provision of postal services without a General Authorisation: a) 1 for the Undertaking KONSTANTINIDOU ZOI, b) 1 for the Undertaking KLEITOU GEORGOULA, and c) 1 for the Undertaking DELATOLAS EXPRESS CARGO, following ELTA denunciation.
- ☑ Issue of Decisions a) assigning 16 frequencies for "Point-to-Point" links and rejecting 2 applications, b) approving 1 Licence for PMR Networks.
- ☑ Issue of Decisions approving 1,341 applications for the assignment of Domain Names with a [.gr] suffix.
- ☑ Issue of Decisions approving 4 applications for the assignment of numbers from the NNP.





## INTRODUCTION



## Introduction

In 2003, EETT continued exercising its regulatory and supervisory role in the telecommunications and postal markets. EETT's work was versatile and its main goals were to protect consumer rights and to ensure smooth operation of the two markets.

Regarding the first goal, all actions carried out had as an objective the benefit of citizens that use telecommunications and postal services. EETT's role in enhancing consumer's position in both markets was critical. Especially in the telecommunications market, the balancing and reduction of telephone tariffs and the improvement in the quality of provided services were important developments.

The consumer now plays a decisive role in both markets and at the same time has the possibility of choice between providers and services sufficiently addressing his/her personal needs. In this framework, EETT saw to the establishment of the necessary mechanisms –mostly through the Consumer Service Sector (CSS)- in order to protect consumers and safeguard their interests. Attention was paid to consumers' adequate information on the developments in the telecommunications and postal markets and the new options they are offered in order to make the best possible choices. Consumer information was mainly provided by publishing information leaflets on issues of immediate interest.

### Telecommunications Sector

The year 2003 was the third year of complete liberalisation of the telecommunications market in Greece, with EETT playing an important role in the further development of telecommunications. During the year, EETT's two-fold role in the market of

telecommunications services was distinguished, on a regulatory level through interventions in order to promote competition and consumers' position in the market, and on a supervisory level aiming to ensure the smooth operation of the market.

In this framework, EETT's activities focused on two main strategic goals, the first being the establishment of conditions for the development of modern networks and innovative services and the second being the promotion of competition between network and service providers. The common goal of both was the further development of telecommunications in Greece, which is expected to have a positive effect on the strengthening of the Greek economy and at the same time secure the provision of high quality telecommunications services in competitive prices to the consumers.

Aiming to develop modern telecommunications network infrastructure, EETT focused on the completion of the regulatory framework that governs the telecommunications sector and especially on the following actions.

EETT has completed the existing numbering plan in relation to the implementation of the new National Numbering Plan (NNP). The NNP, a necessary precondition for the progress and development of telecommunications, fully addresses the ever-growing needs in numbers, resulting by the liberalisation of the telecommunications market.

EETT has also reshaped the regulatory framework concerning the definition, control and publicity procedures of the telecommunications providers tariffs. This reformation achieves on one hand a more effective control of tariffs and on the other hand, a timely consumers' update on the tariffs of the provided services.



Furthermore, EETT has conducted the necessary cost controls on providers under the obligation to price specific services on cost orientation principles.

An important action was the introduction of a new framework for a better management of Domain Names with a [.gr] suffix and the definition of a more flexible procedure for their assignment, through the operation of the Registrar-Registrant-Registry scheme. The goal was to invigorate the Internet market and to maximise the benefits for the users. Furthermore, the completion of the institutional framework for the Electronic Signature is expected to contribute to the promotion of electronic transactions and communication through the Internet, ensuring at the same time the protection of consumers.

In order to ensure the development of the consumers' broadband access to networks and services, EETT focused on promoting broadband services in the Greek market, paying particular attention to the implementation of new technologies (such as W-LAN, xDSL, UMTS).

At the same time, EETT focused on the promotion and safeguarding of competition in the domestic telecommunications market. Given that 2003 constituted a transitional stage between the Regulatory Framework in force and the new one, EETT faced the arising issues in the Greek market, on one hand using the Framework in force and on the other hand bearing in mind potential changes from the harmonisation with the new European Regulatory Framework on electronic communications. In this sense, EETT's most important interventions were the following:

- The reexamination of the mobile communications market and the redesignation of Organisations with Significant Market Power (SMP) in the aforementioned market.

- The analysis of the national Interconnection market and the designation of Organisations with SMP.
- The implementation of economic-technical models for fixed and mobile networks, aiming at the more effective control of tariffs of providers that are still under regulation.

Furthermore, EETT, taking into consideration the new Framework, proceeded to the analysis of the mobile call termination market and of the publicly available local or/and national telephone services provided at a fixed location. It is also worth mentioning that during 2003 and under EETT's supervision and guidance, the proper mechanisms were implemented, in order to allow the introduction of Number Portability in the Greek market in 2004.

### **Radio Spectrum Sector**

Radio spectrum is a national resource of decisive importance for the development of the telecommunications market, as well as of other economic activity sectors, such as research and development. It constitutes a scarce resource, considering that the total of frequencies available in a specific geographical area is finite. Thus, the method in which frequencies are made available and the spectrum usage terms are of great importance, in order to ensure the spectrum rational use and the maximisation of benefits to the end user.

EETT, recognising the importance of the radio spectrum, set as its primary goal for 2003 to ensure its optimum and legal use by proceeding to the following actions.

EETT introduced a modern regulatory framework, which addresses the needs of the market and describes in detail the terms of availability and use of the spectrum. In particular, the issuance of a new



Regulation on Radio Frequencies Usage Fees is mentioned, which shaped an objective and effective spectrum usage economic framework.

EETT strengthened and upgraded the mechanisms of every additional operation related to the management of the radio spectrum, emphasising the update of the National Radio Frequencies Registry (NRFR) and the choice of the proper criteria for radio frequency assignment, which will ensure quality services and coordination of as many users as possible. The NRFR constitutes an essential tool for the management of the radio spectrum and includes all radio frequencies assigned in the Greek territory.

Furthermore, EETT, continuing the uninterrupted monitoring of the radio spectrum and in order to respond to the increased supervision needs, upgraded its technical-material infrastructure and strengthened the level of readiness in order to face any interference in "high priority" networks. More specifically, EETT emphasised the unimpeded operation of the wireless networks related to the protection of human life and public safety. In addition to that, EETT expanded its supervisory role outside the prefecture of Attica. More specifically, in order to cover the supervisory needs that concern Northern Greece and mainly the areas of Macedonia, Thraki and Thessalia, EETT proceeded to the establishment of a Regional Office in Thessalonica.

Of special importance for the radio spectrum sector was the procurement of the National Spectrum Management and Monitoring System (NSMMS) and the commencement of the necessary procedures for its operation. Through the above System the rapid development of new wireless technologies and applications will be achieved, as well as the protection against illegal interferences and the

provision of a safe and reliable radio communications environment during the Olympic Games.

At the same time, one of EETT's goals was to ensure the placing on the market and use of Radio Equipment and Telecommunications Terminal Equipment (RTTE) –according to the specifications and demands of the new European framework- and the protection of consumers. To this end, EETT issued Regulations, which defined the procedure and the terms of use and placing on the Greek market of RTTE. Furthermore, EETT began the procedure for surveillance and assessment of conformity of radio equipment available in the market.

### **Olympic Games**

During the 2004 Olympic Games, a significant increase in demand for radio communication services will be observed. As a result, the demands in radio spectrum for this period will be extremely high due to the flexibility, ease and speed of evolution that characterises the wireless radio communication networks.

EETT, aiming to ensure the availability of the necessary radio spectrum, free from any interference, for the unimpeded operation of the above services during the Games, planned and put into operation, in 2003, a total of actions that included all the areas in its responsibility. Specifically EETT:

- Proceeded to the temporary assignment of 2G Mobile Communications spectrum to the mobile telephony providers who expressed relevant interest in order to meet increased network coverage needs during the Olympic Games in the region of Attica.
- Designed and implemented –for the first time ever during Olympic Games- in collaboration with the Organisational Committee of the Olympic Games ATHENS 2004 (ATHOC), a network application



for the electronic submission of temporary radio frequencies assignment requests.

- ▶ Defined detailed procedures for the monitoring of the spectrum's legal use and the management of interference problems during the Games, as well as the responsibilities of each body involved.
- ▶ Was present in all the Test Events carried out during the year, in order to be properly prepared.
- ▶ Prepared the recording, the sample technical control and the marking of the radio equipment, so as to be used properly in the Olympic facilities and to minimise the possibility of interference problems.
- ▶ Continued the close cooperation with all bodies involved in the Olympic Organisation, (ATHOC, International Olympic Committee-IOC etc.), with the aim to solve radio spectrum availability issues for the Games' coverage needs as well as to settle organisational, coordination and collaboration issues on an operational level.

### Postal Services Sector

In 2003, the sector of postal services was marked by the harmonisation of the Greek Legislation with Directive 2002/39/EC, by which the further promotion of the gradual and controlled liberalisation of the postal market is achieved. In this framework, the Ministry of Transportation and Communications (MTC) issued Law 3185/2003, which amended Law 2668/1998. During the year, EETT focused on the following actions.

EETT introduced a modern and complete regulatory framework, capable of addressing the new needs arising from the operation of undertakings under liberalisation. To this end, EETT issued the Regulation on General Authorisations, which shaped a more effective and flexible framework on undertakings' entry for the provision of services not included in the Universal Service (US). This specific Regulation is expected to contribute to the

improvement of the provided services quality, to the unimpeded operation of competition in the market and to the interconnection of postal undertakings Networks.

By the Law 3185/2003, EETT was assigned the responsibility to grant Individual Licences. In this framework, EETT issued the Regulation on granting Individual Licences, which sets the conditions for the provision of postal services in the field of US, besides those that are included in the exclusive rights of the Universal Service Provider (USP). Furthermore, it issued a Regulation on the calculation of the cost of US provision. The aforementioned Regulations constitute important tools for the promotion of development and the smooth operation of the postal market.

A parallel goal was the establishment of rules for the quality of Courier Services, which EETT included in the Regulation on General Authorisations, in order to ensure the promotion of competition and the improvement of services provided. In this framework, the definition of the minimum requirements of the Postal Items Special -Track and Trace- System (PISTTS) of undertakings, was important for the provision of a postal service that is differentiated from that of the US. With this system, the monitoring of items in every handling stage is ensured, as is the interconnection of undertakings integrated in the Network of the licensed undertaking, operating under order and on account of the licensed undertaking, as well as the exchange of information between the collaborating licensed undertakings and their respective Networks.

During 2003, the monitoring-controlling role of EETT was significant. Controls in the market were conducted and administrative penalties were imposed for the inefficient provision of postal services and for illegal activity. Thus, EETT contributed to the resolution of any consumer problems and in general to the smooth operation of the market.

Furthermore, EETT continued measuring the US quality aiming to improve the service offered to consumers by the USP.

### **Other Actions**

The particularly high demands in exercising EETT's role, render indispensable EETT's adequate and efficient internal structure and organisation and thus, in 2003, EETT moved towards this direction.

Of major concern was the implementation of the new organisational chart according to Presidential Decree (PD) 387/2002 as well as the coverage of the high responsibility positions provided. At the same time, EETT continued its staffing with personnel, capable of responding to the high demands of its role.

For EETT's effective operation, internal support mechanisms were implemented (i.e. a new payroll system, a payroll and human resources management system) and IT support applications (i.e. complaints management application, Intranet). Furthermore, emphasis was given to EETT's preparation for the adaptation of its operation to an integrated informational structure, which will automate all procedures, establishing a modern digital culture.

An important tool for the achievement of EETT's goals was its Business Plan (BP), which set the strategic goals and priorities on which its operation was structured during the year.

Furthermore, EETT's presence and participation in international bodies and committees was significant, taking into consideration the fact that its framework of operation is not restricted to the confined limits of a state, but has an international character and is affected by the general developments in other states.

Furthermore, EETT also successfully supported the organisation of Conventions and Conferences on a European and national level.

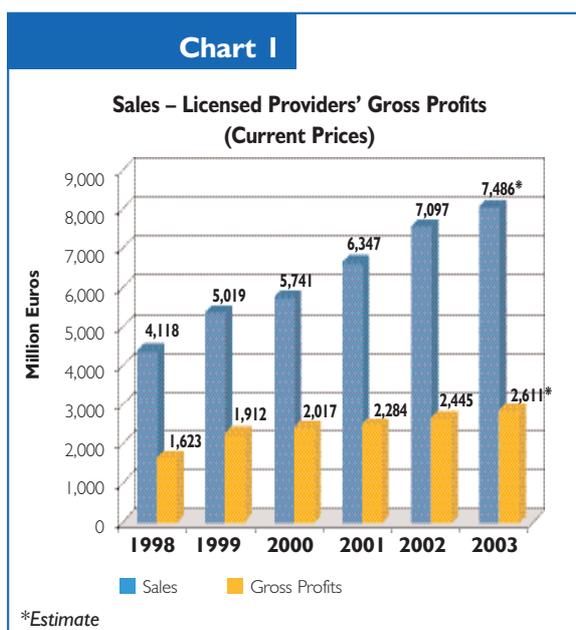
Finally, EETT's participation in the Information Society Operational Plan (OP-IS) of the 3<sup>rd</sup> Community Support Framework (CSF) was also important.

In the following chapters, EETT's actions per sector and per strategic goal are presented. At the same time, quantitative data is provided, which confirms on one hand the positive results of EETT interventions in the relevant sectors, and on the other hand the development presented by the sectors of telecommunications and postal services in Greece, during 2003.



## I. Overview of Markets

In this Chapter, quantitative data on the telecommunications and postal services markets is included, which demonstrates the significant development of the aforementioned markets. Specifically for the telecommunications sector, among others, general financial data is presented, such as the assets and profits of providers active in the Greek market, as well as other market data such as the number of active providers, the traffic from telephone calls and data that concerns the existing telecommunications infrastructure. At the same time, comparisons with relative data from other European countries are presented. In the sector of postal services we present data concerning the number of active providers and handled postal items, the percentage distribution of domestic and international handled items, as well as Universal Service (US) data.



Source: EETT

### I.1. Telecommunications

#### I.1.1. Financial Data of Telecommunications Market

In this Section the most significant financial data of the Greek telecommunications market is presented, as derived from the analysis of published balance sheets of licensed providers for the years 1998 - 2002. For the year 2003, the data provided is an estimate based on the published nine-month period balance sheets of providers, under the obligation to publish the specific balance sheets.

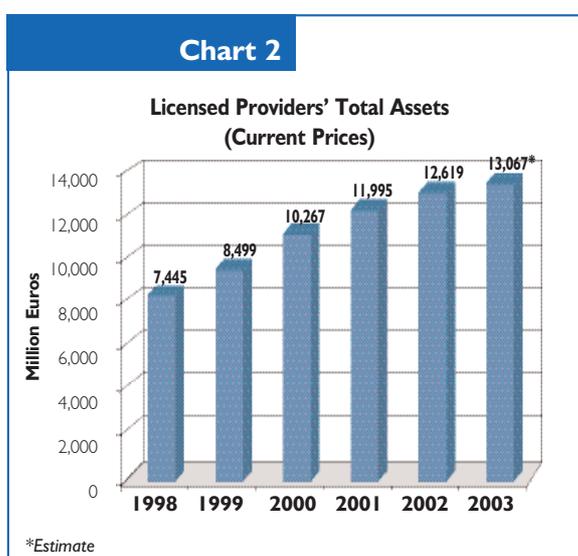
According to the data mentioned above, the domestic telecommunications market, based on the turnover (sales) of active providers in the sector, is estimated to have presented an increase of 5.4%, instead of 11.8 % in 2002. The market's size for 2003, as it appears in Chart I, is estimated in current prices at 7.5 billion euros, instead of 7 billion euros for 2002. Based on the same estimates, in 2003 the Hellenic Telecommunications Organisation (OTE) owned a share of more than 50%, while the mobile telephony providers more than 40%, of the aforementioned revenues. Furthermore, in Chart I, the profit (gross profits) of providers is presented, which in 2003 is estimated to exceed 2.5 billion euros (increase of 6.7%), and generally presented a stable increasing trend during the period 1998 - 2003. Furthermore, in 2003, earnings before interest, taxes, depreciations and amortisations (EBITDA) of the market are estimated to amount to 1.3 billion euros, while net profits barely exceeded 1 billion euros (all in current prices).

An equally interesting element is the financial robustness of the market, which is also demonstrated by total assets, which are estimated at 13 billion euros for 2003 (increase rate 3.5%), in comparison to 12.6 billion euros for 2002 (see Chart 2). In what concerns the total of property

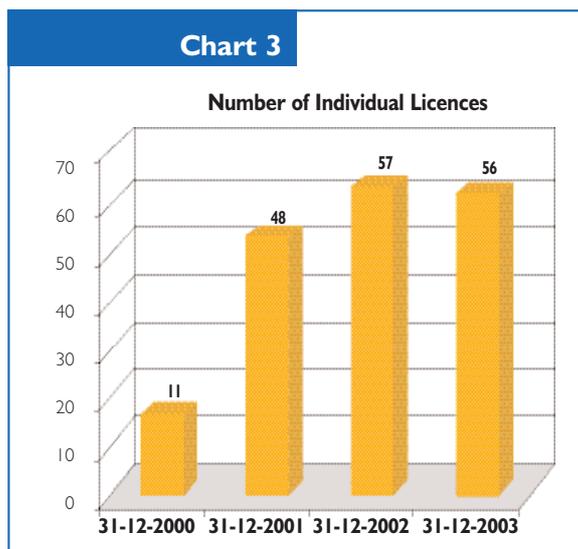


assets of the telecommunications market, OTE owned more than 60%, compared to 30% owned by mobile telephony providers.

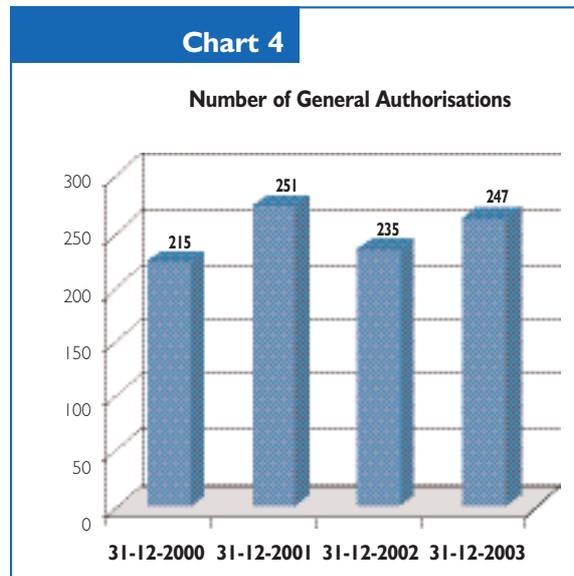
Finally, the figure of man power employed by licensed providers, varies between 24,500 and 25,500 persons, with OTE and mobile telephony providers employing more than 67% and 23% respectively, of the total of employees.



Source: EETT



Source: EETT



Source: EETT

**Table I**

**Number of Individually Licensed Providers per Activity, 31-12-2003**

| Activity   | Number of Providers <sup>1</sup> |
|--|----------------------------------|
| Voice Telephony and Development of Fixed Network | 13                               |
| Voice Telephony                                  | 11                               |
| Development of Fixed Network                     | 2                                |
| Satellite  | 10                               |
| 2 <sup>nd</sup> Generation Mobile Telephony      | 4                                |
| 3 <sup>rd</sup> Generation Mobile Telephony      | 3                                |
| TETRA  | 1                                |
| W-LAN  | 3                                |

Source: EETT

### 1.1.2. Licensing

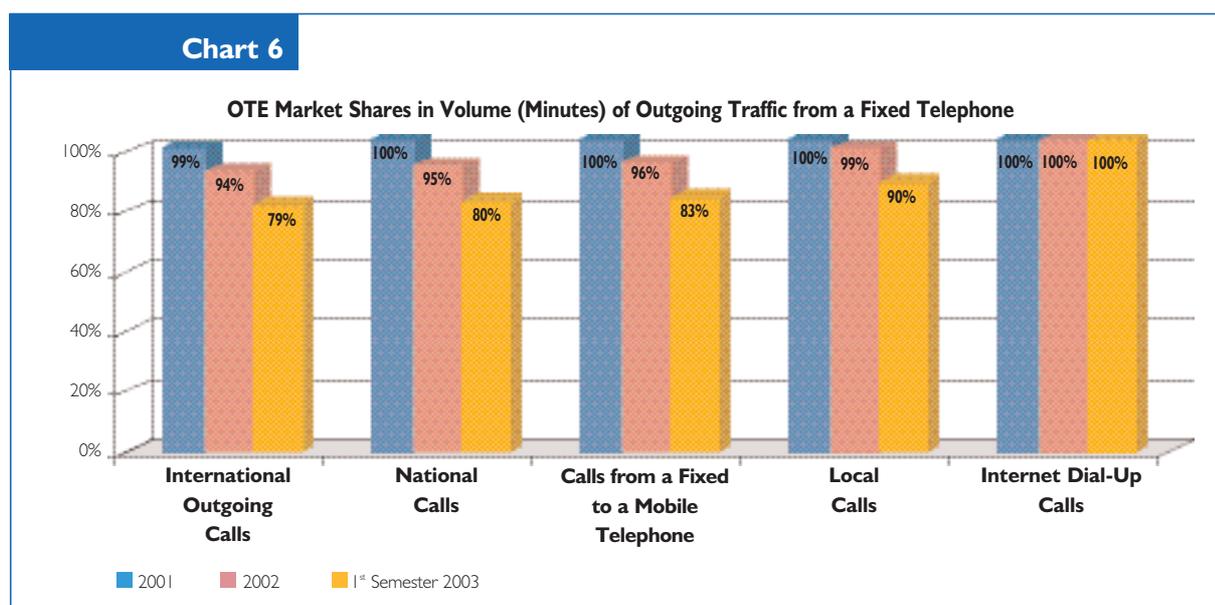
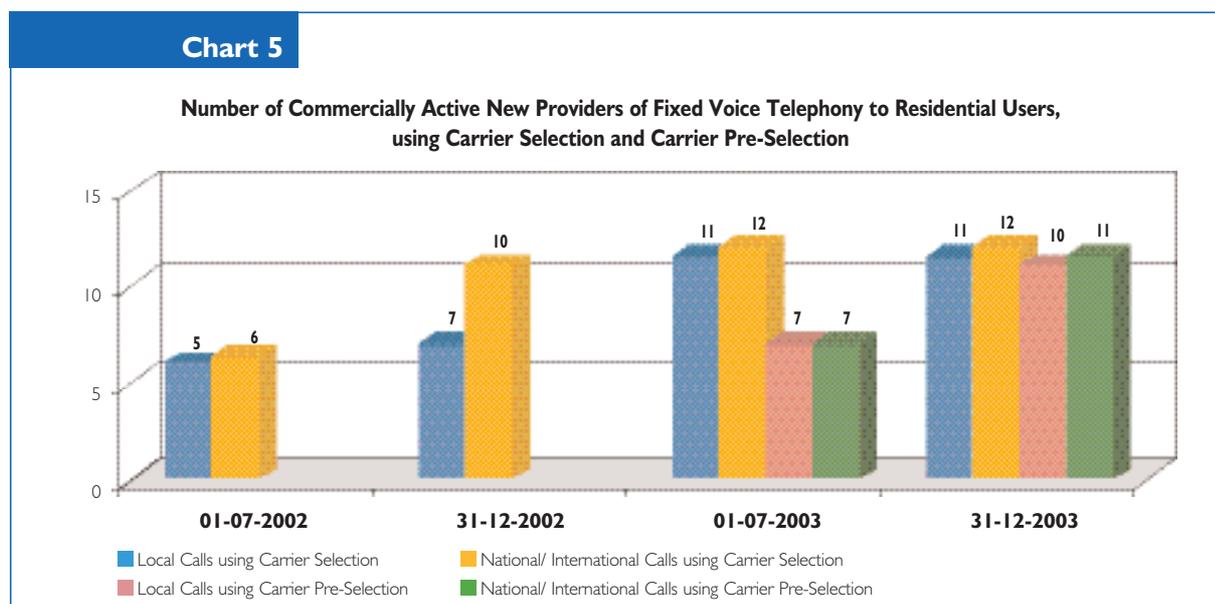
In Charts 3 and 4 the fluctuation of the number of licensed providers (owners of Individual Licences and General Authorisations) is presented, from the beginning of 2001 until the end of 2003. It is noted that an Individual Licence is required for the installation of telecommunications networks through public areas

<sup>1</sup> A provider may be granted Individual Licences for different activities.

(transit rights), as well as for the provision of telecommunications services requiring scarce resources. Furthermore, a General Authorisation is required for the exercise of any telecommunications activity that does not fall under the framework of Individual Licences. In Table I, the number of Individual Licences owners per activity is presented, as it was shaped at the end of 2003.

### 1.1.3. Fixed Voice Telephony

In 2003, three years had passed from the full liberalisation of the Greek market of fixed voice telephony, characterised by a rapid increase in the number of new providers and intensification of competition. The latter mostly concerned the provision of fixed voice telephony through Carrier

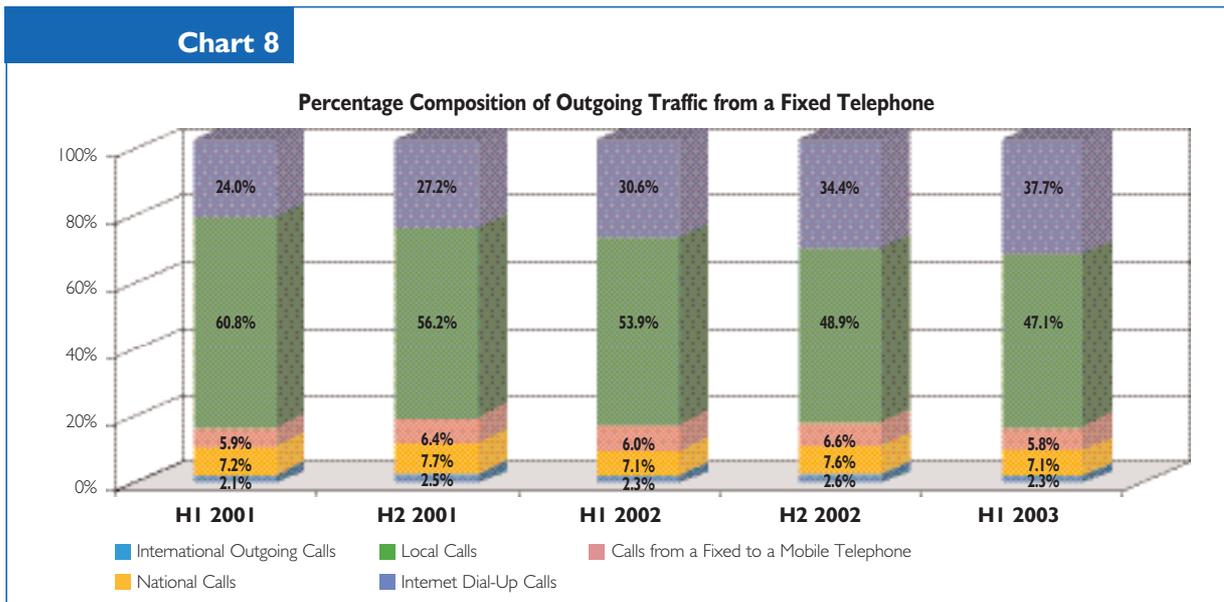
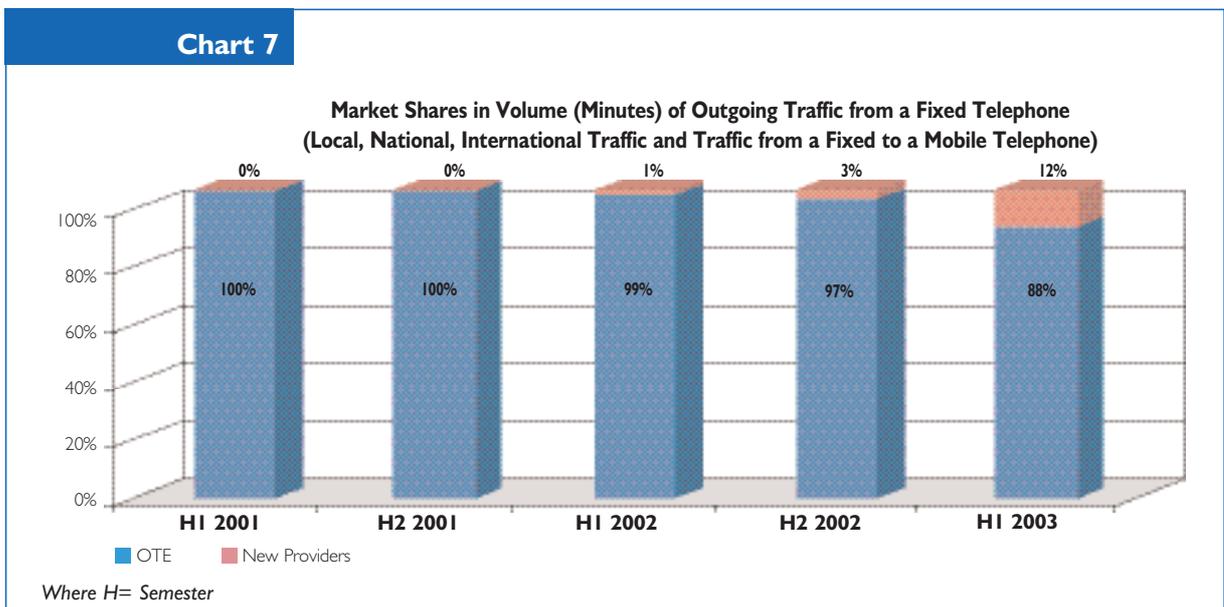




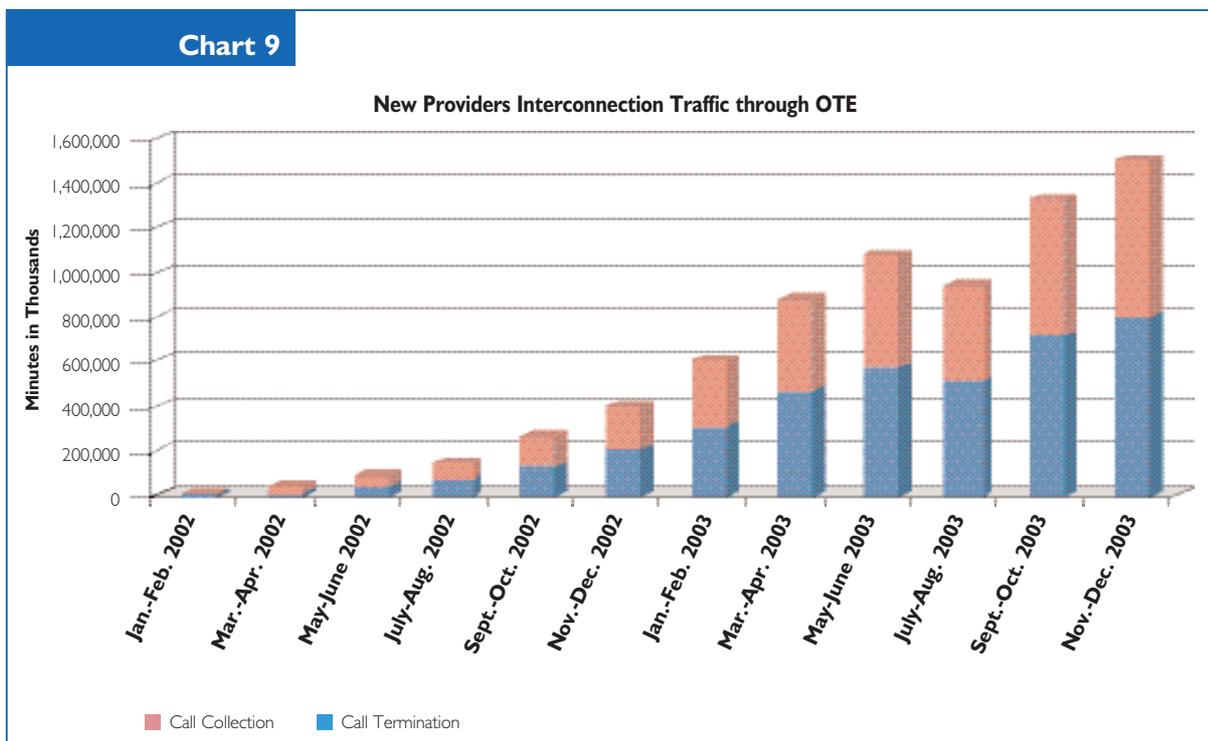
Selection and Carrier Pre-selection, services that started being provided to residential users in the beginning of 2002 and 2003 respectively. At the end of 2003 (see also Chart 5), 12 providers were commercially active in the provision of calls through Carrier Selection service, 11 of which were also active through Carrier Pre-selection service.

throughout the years, per outgoing call category, based on the traffic initiated from a fixed phone and include the following call categories: local, national, international, to mobiles and to the Internet. Taking into consideration the aforementioned categories, with the exception of calls to the Internet, the market share gained by the new providers is estimated at 12% during the first semester of 2003 (see Chart 7).

In Chart 6 (page 27) we present the shares of OTE,



Source: EETT

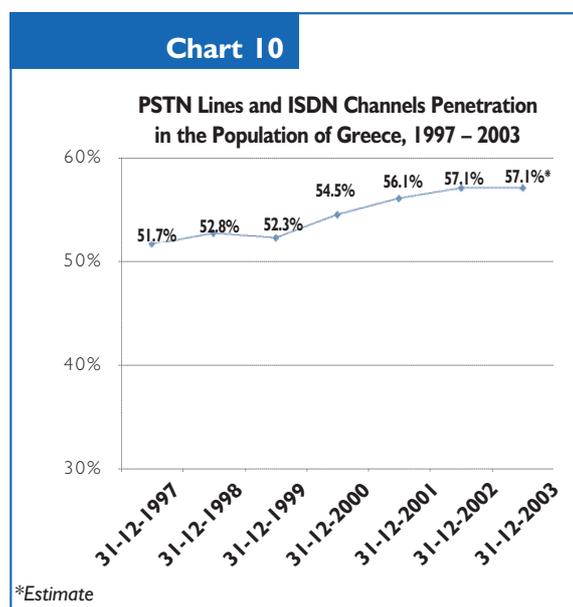


Source: EETT

In Chart 8, we present the percentage composition of outgoing traffic from a fixed telephone (local, national, international, to mobiles and to the Internet), according to which the largest part of traffic concerns local calls and calls to the Internet.

The majority of new voice telephony providers, as it was already mentioned, provides services through the Carrier Pre-selection or Carrier Selection. Thus, the majority of their traffic utilises the network of OTE. In Chart 9, the evolution of Interconnection traffic is presented, which has been collected by OTE's network and terminated in its network, on account of the new voice telephony providers. The rapid increase of Interconnection traffic is remarkable, a fact that reflects the increase of the level of competition in the fixed voice telephony market.

It should be noted that collection traffic is defined to be the traffic that initiates from a fixed phone of an OTE subscriber, through the service of Carrier



Source: EETT

Selection or Carrier Pre-selection, on account of a new telecommunications provider. Whereas call termination traffic is defined to be the traffic that terminates at a fixed phone of an OTE subscriber and which comes from the network of a new fixed voice telephony telecommunications provider.



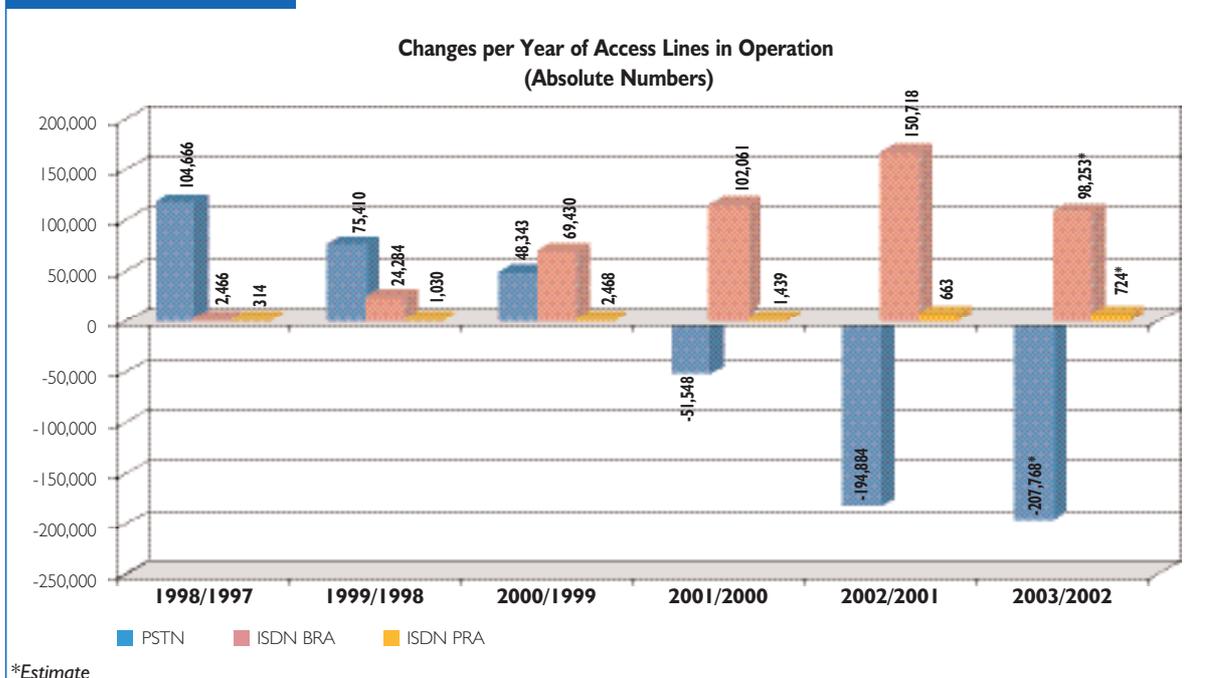
**Table 2**

| Access Lines to the Public Telephone Network (Lines in Operation) |            |            |            |            |            |            |             |
|---|------------|------------|------------|------------|------------|------------|-------------|
|   | 31-12-1997 | 31-12-1998 | 31-12-1999 | 31-12-2000 | 31-12-2001 | 31-12-2002 | 31-12-2003* |
| PSTN  | 5,430,855  | 5,535,521  | 5,610,931  | 5,659,274  | 5,607,726  | 5,412,842  | 5,205,074   |
| ISDN BRA  | 792        | 3,258      | 27,542     | 96,972     | 199,033    | 349,751    | 448,004     |
| ISDN PRA  | 134        | 448        | 1,478      | 3,946      | 5,385      | 6,048      | 6,772       |
| Penetration   | 51.7%      | 52.8%      | 52.3%      | 54.5%      | 56.1%      | 57.1%      | 57.1%       |

\*Estimate

Source: EETT

**Chart 11**



Source: EETT

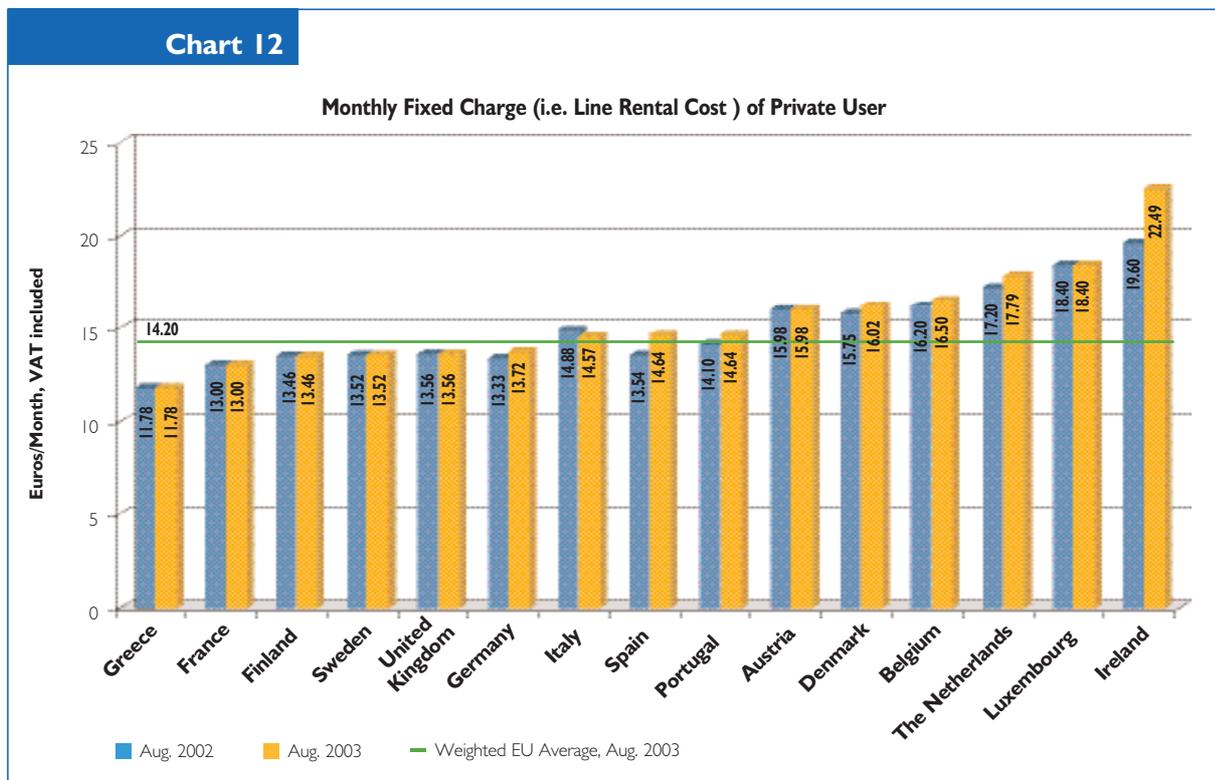
The penetration of fixed voice telephony in the population, measured in 64 Kb/s equivalent channels, is estimated to have remained stable, at 57.1% (see Chart 10 and Table 2) and OTE's respective share fluctuated to over 99%. In absolute numbers, the changes of access lines in operation per year, are presented in Chart 11.

According to the 9<sup>th</sup> Report by the European Commission, the OTE tariffs of fixed voice telephony, are among the lowest in comparison to the respective

tariffs of the historically prevailing telecommunications providers of the other European Union (EU) member-states. More specifically, as displayed in Chart 12, the monthly OTE rental charge is the lowest for residential users and business users. In Chart 13, we present the evolution of OTE's fixed charge, in comparison to the weighed (in relation to the population of each member-state) average of monthly rental charge applied by the remaining EU historically prevailing providers.

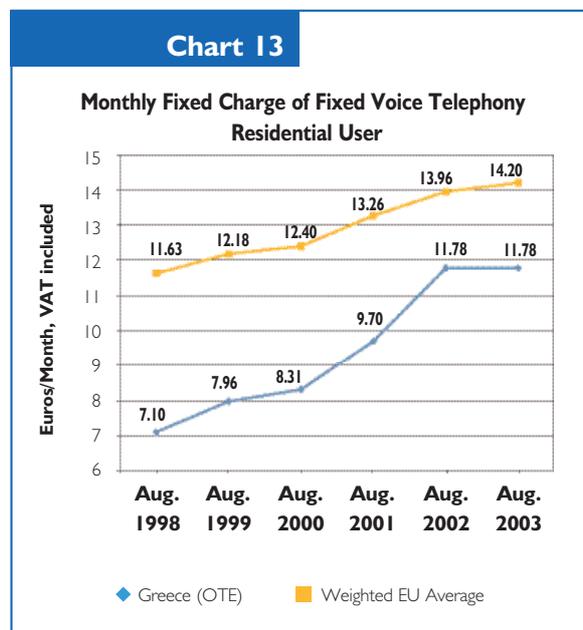


Chart 12



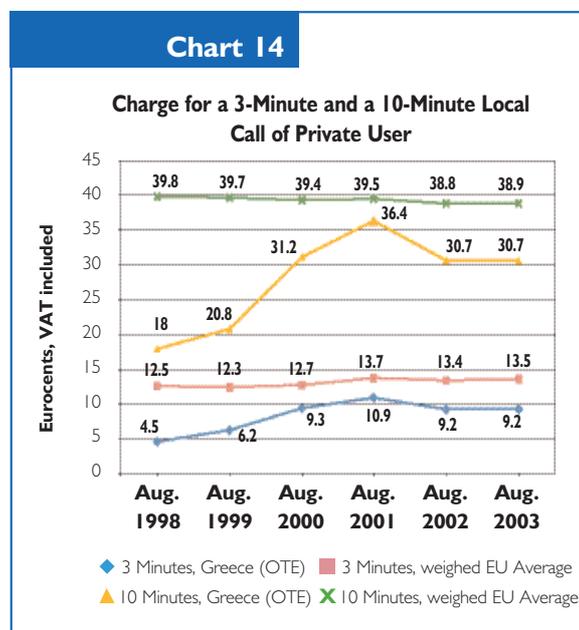
Source: 9<sup>th</sup> European Commission Report

Chart 13



Source: EETT and 9<sup>th</sup> European Commission Report

Chart 14



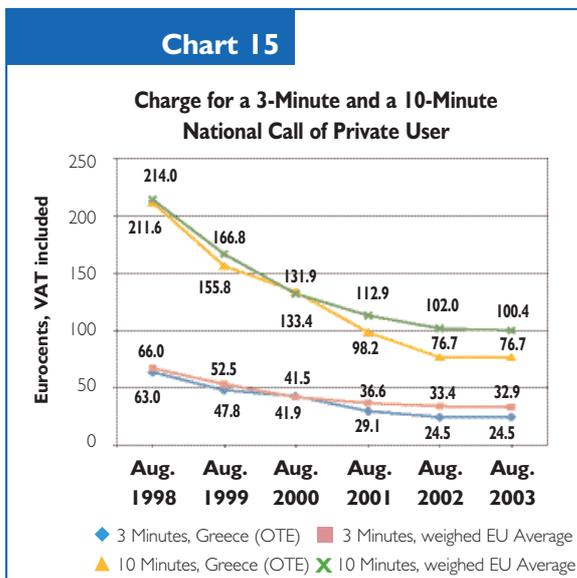
Source: EETT and 9<sup>th</sup> European Commission Report

Respectively in Chart 14, one can see the evolution of charges for a residential user making a 3-minute and a

10-minute local call in rush hours, in comparison to the other EU member-states.



**Chart 15**

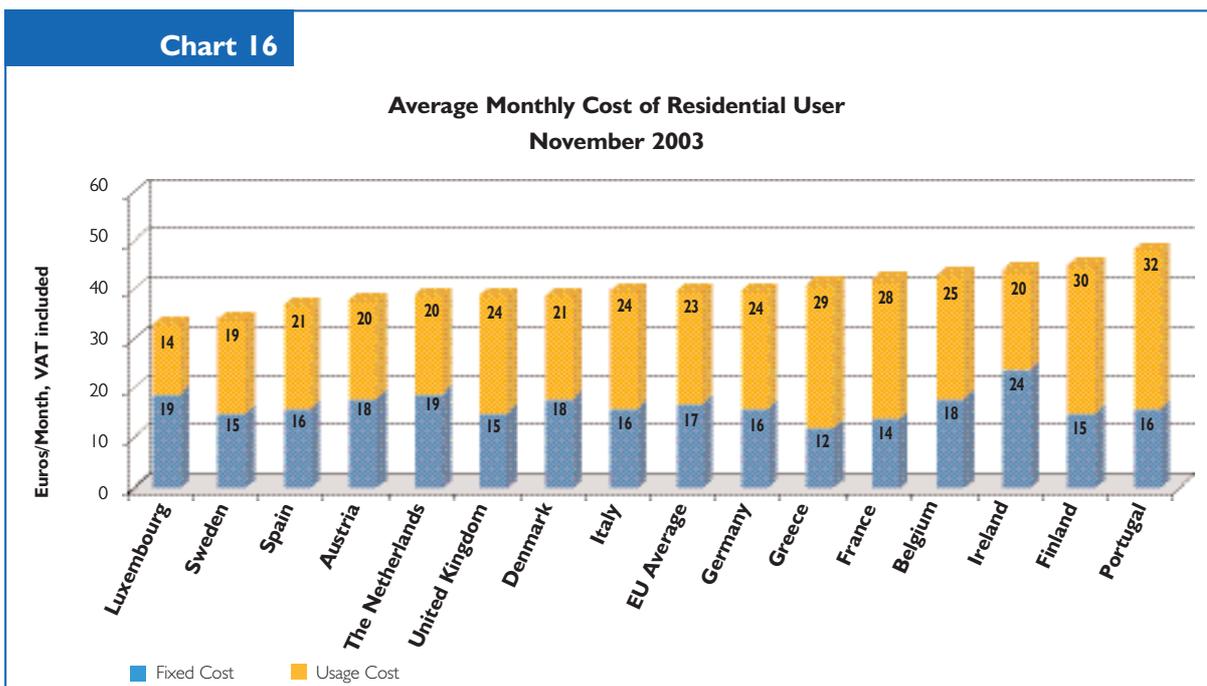


Source: EETT and 9<sup>th</sup> European Commission Report

For a national call, the respective data is presented in Chart 15.

The total monthly expense of a private user of fixed voice telephony (under the condition however that the user displays a specific use of his/her telephone, which is described by a defined "basket" of calls based on a methodology of the Organisation for Economic Cooperation and Development–OECD), is presented per member-state in Chart 16. Respectively, in Chart 17 one can see the total monthly expense of a business user. It should be noted that the comparisons are presented per country, but in essence they concern the historically prevailing telecommunications provider of each country.

**Chart 16**



Source: EETT, based on OECD methodology

Note 1: The above data derives from a methodology used by the EU as well as by the OECD in international tariff comparisons. According to that methodology, a "basket" is set, which includes specific, and well-defined telecommunications services and then the cost created from the use of services in the aforementioned basket, for the user of the prevailing telecommunications provider of each member-state, is calculated.

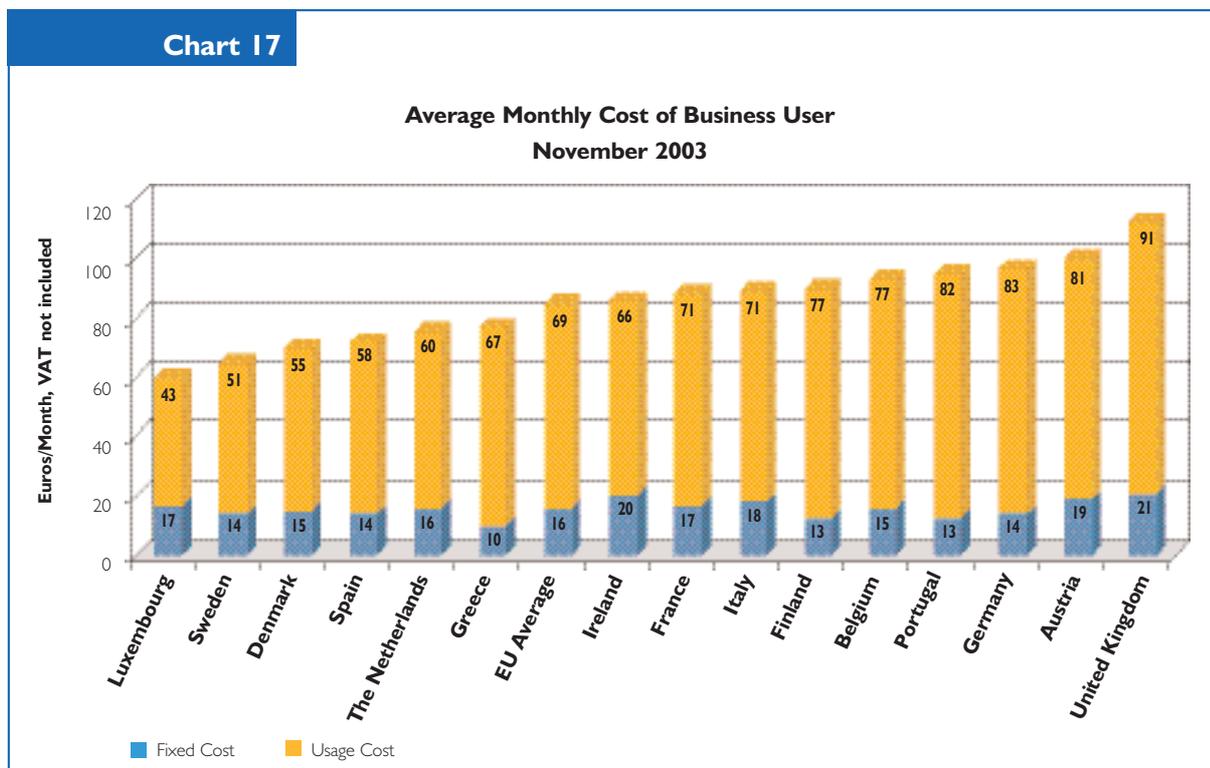
Note 2: The cost of the residential user, based on the applied methodology, includes on an annual basis: a) the fixed cost which is defined as the monthly fixed charge plus the installation cost for a new connection (amortised in 5 years) and b) the usage cost (i.e. the variable expense), which refers to 1,200 national calls to a fixed phone, 120 calls to a mobile phone<sup>2</sup> and 72 international calls<sup>3</sup>.

<sup>2</sup> That is, 10% of the total calls to a fixed telephone.

<sup>3</sup> That is, 6% of the total calls to a fixed telephone.



Chart 17



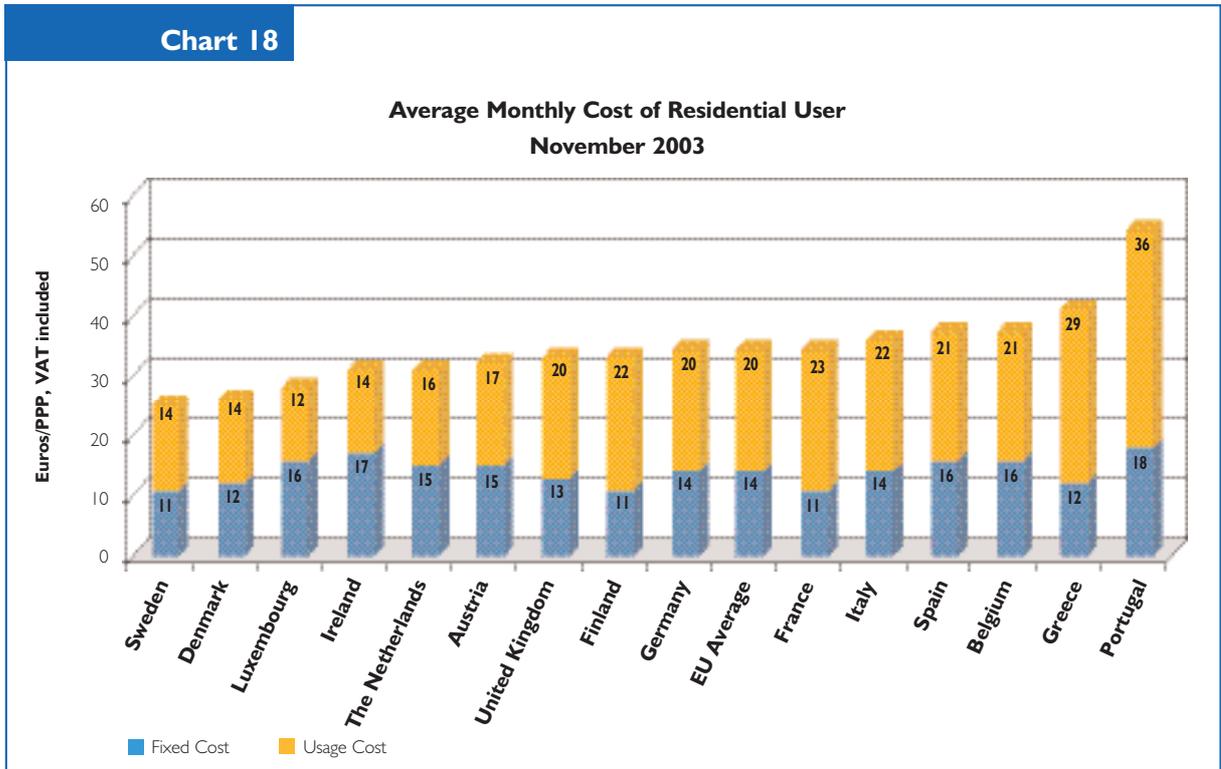
Source: EETT, based on OECD methodology

As it can be seen in Charts 16 and 17, the cost in the case of Greece is close to the EU average. However, the situation is different if one takes into consideration the purchasing power parities of each country. In that

case (see Charts 18 and 19), Greece is placed 14<sup>th</sup> (from 10<sup>th</sup>) for the highest expense of a private user and 9<sup>th</sup> (from 6<sup>th</sup>) for the highest expense of a business user.

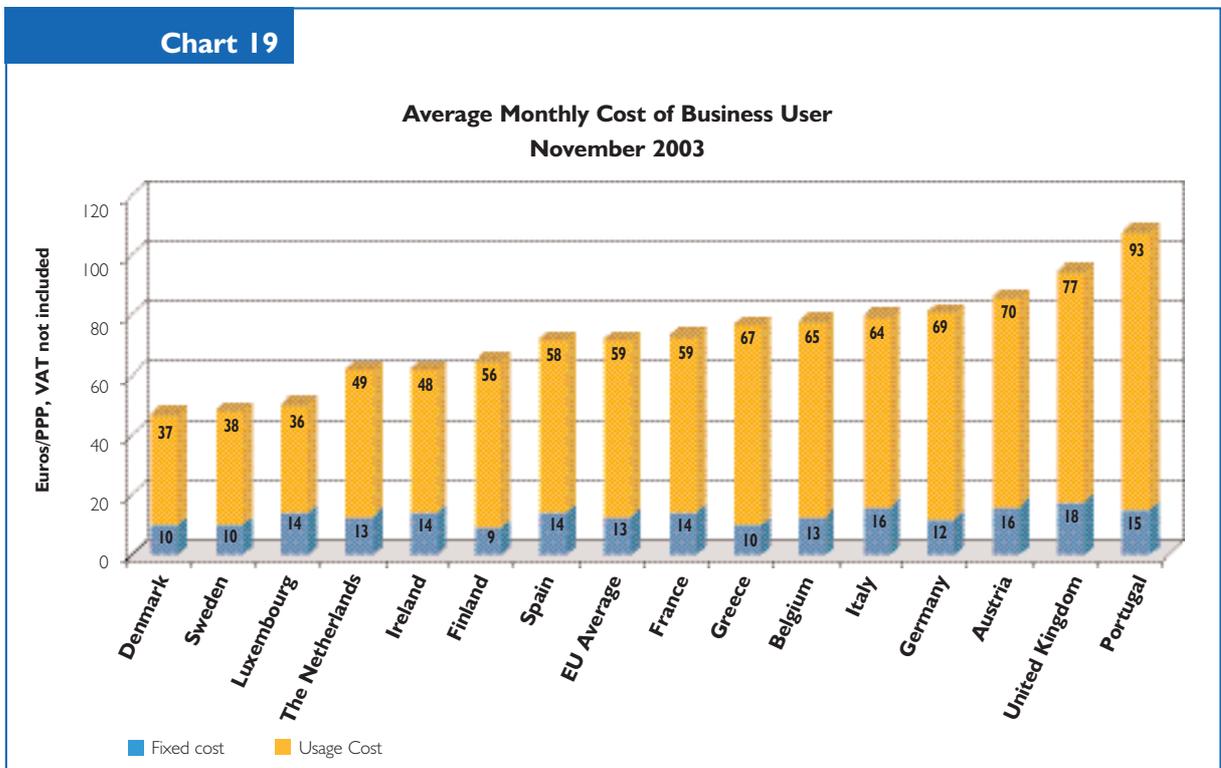


Chart 18



Source: EETT, based on OECD methodology

Chart 19



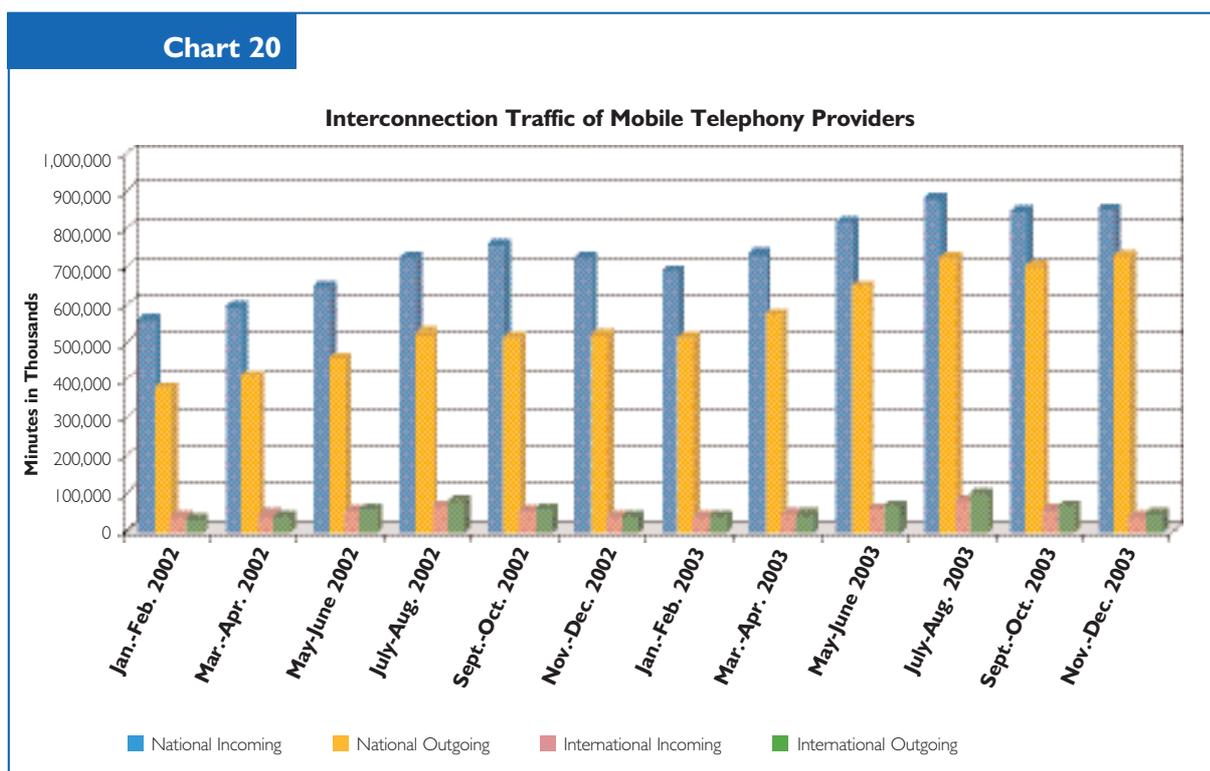
Source: EETT, based on OECD methodology



### I.1.4. Mobile Telephony

The year 2003 was an important year for all four providers active in the mobile telecommunications sector in Greece, due to an increase of their financial and commercial figures (income, subscribers, telecommunications traffic etc.), as well as due to the preparation of the three providers –COSMOTE S.A., STET HELLAS S.A. and VODAFONE- that hold a relevant Licence for the commercial distribution and exploitation of 3<sup>rd</sup> Generation (3G) networks. In addition, the providers focused on the increase of mobile devices use by consumers, the expansion of their customer base and the increase of consumer choices in relation to the provided services.

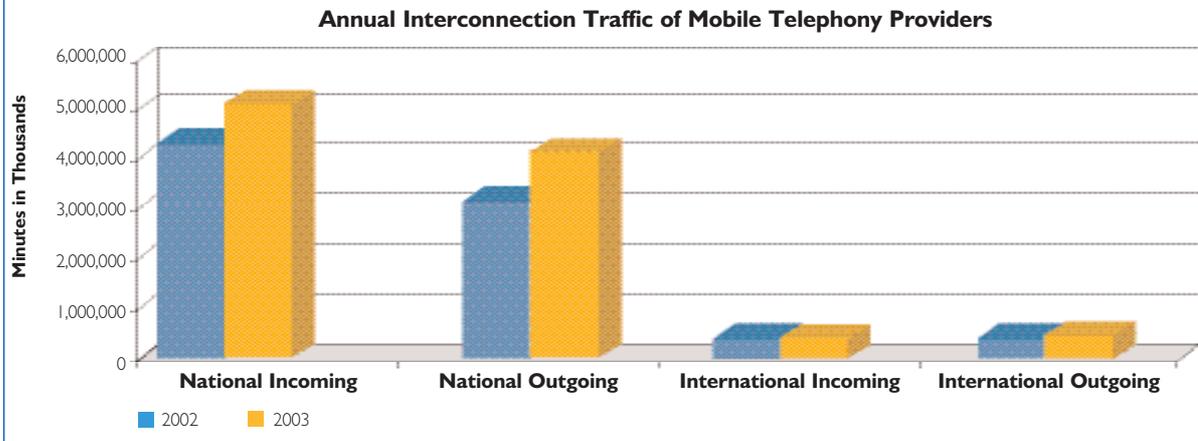
The Interconnection traffic of mobile telephony providers, as it appears in Chart 20, presented increasing trends. In this Chart, the national and international Interconnection traffic (incoming and outgoing) is presented for the four mobile telephony providers. National traffic relates to traffic originating from (incoming) or is intended for (outgoing) other domestic fixed and mobile telephony providers, whereas international traffic originates from or is intended for providers abroad. In Chart 21 (page 36) the aforementioned traffic is presented per year.



Source: EETT



Chart 21



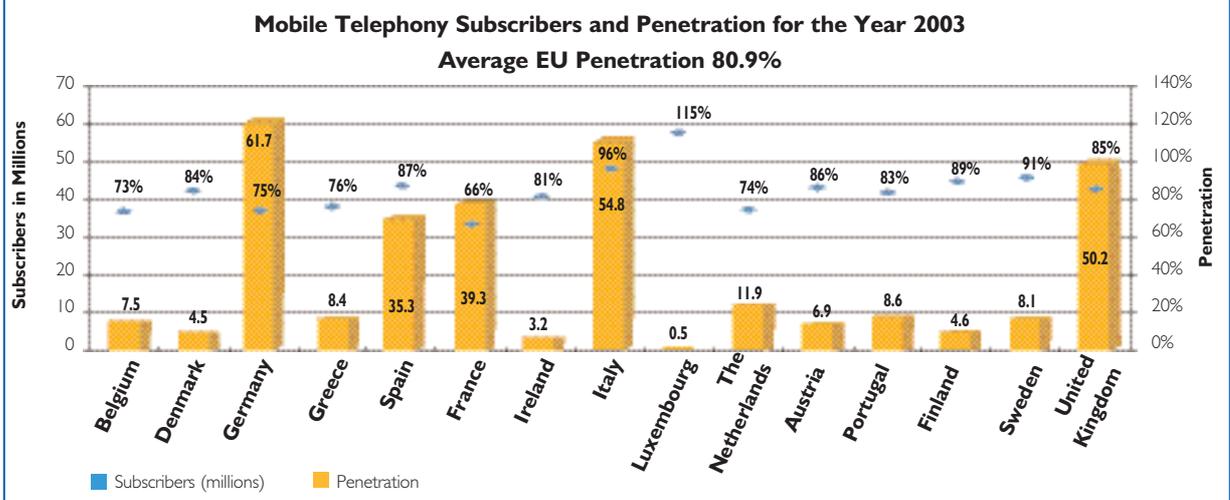
Source: EETT

In total, the sector is estimated to have presented an increase in all its basic financial figures, in relation to 2002. In detail and based on the published balance sheets (2003 nine month period) of the providers, it is estimated that sales will present an increase of 17%, reaching 3.4 billion euros for 2003. Respectively, it is calculated that the sector's profits (before tax, interests and amortisations) will amount to 790 million euros (an increase of 18% in relation to 2002) and the number of employees is estimated around 6,000 (an increase of 4 to

4.5% in relation to the former year).

The number of active subscribers by the end of 2003 is estimated at 8.9 million. As active subscribers are defined all contract and prepaid card subscribers from whom an income has been produced during the last trimester. Based on the above number of subscribers, the penetration in the country's population is estimated to be 80.9%. It should be noted that the same index was estimated at 76% in mid 2003 (see Chart 22).

Chart 22



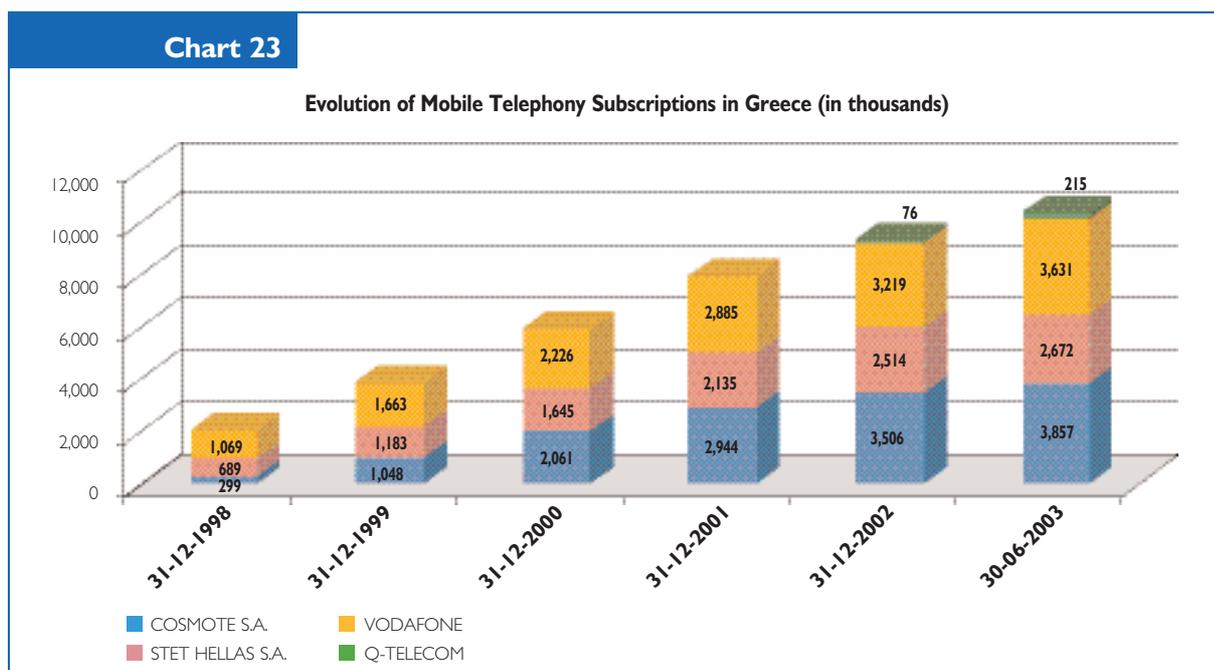
Source: 9<sup>th</sup> European Commission Report

The data on Denmark, Greece, Portugal, Sweden and the United Kingdom refers to July 1<sup>st</sup>, 2003. The data on Spain refers to June 1<sup>st</sup>, 2003, whereas for Finland and Italy the reference point is the end of September 2003.



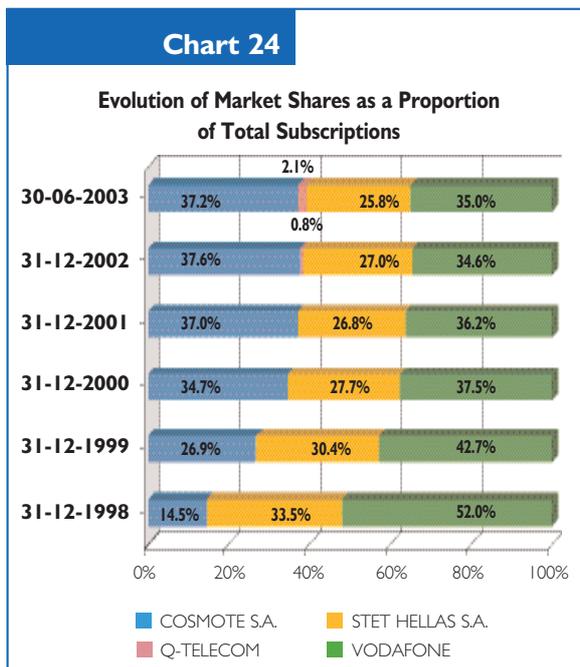
As to the subscriptions, based on the announcements made by mobile telephony subscribers, their number amounted to 10.4 million in mid 2003 (see Chart 23 and Table 3). It is estimated that this number includes subscribers with more than one connection as well as

inactive subscribers. Based on the above data, in Chart 24, the evolution of providers' market shares is presented, and Chart 25 (page 39) depicts the percentage composition of the total customer base for all four providers.

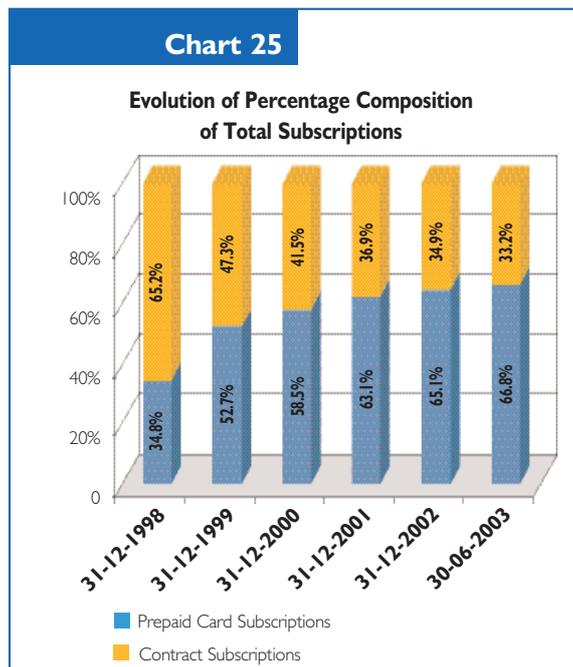




| <b>Table 3</b>                                     |                   |                   |                   |                   |                   |                   |                      |
|--|-------------------|-------------------|-------------------|-------------------|-------------------|-------------------|----------------------|
| <b>Subscriptions of Mobile Telephony Providers</b> |                   |                   |                   |                   |                   |                   |                      |
|  | <b>31-12-1998</b> | <b>31-12-1999</b> | <b>31-12-2000</b> | <b>31-12-2001</b> | <b>31-12-2002</b> | <b>30-06-2003</b> | <b>31-12-2003</b>    |
| <b>COSMOTE S.A.</b>                                |                   |                   |                   |                   |                   |                   |                      |
| Number of prepaid card subscriptions               | 36,684            | 370,586           | 855,946           | 1,481,765         | 1,954,897         | 2,277,207         | 2,321,158            |
| Number of contract subscriptions                   | 262,154           | 677,766           | 1,205,065         | 1,461,767         | 1,551,441         | 1,579,358         | 1,595,852            |
| <b>Total subscriptions</b>                         | <b>298,838</b>    | <b>1,048,352</b>  | <b>2,061,011</b>  | <b>2,943,532</b>  | <b>3,506,338</b>  | <b>3,856,565</b>  | <b>3,917,010</b>     |
| <b>Q-TELECOM</b>                                   |                   |                   |                   |                   |                   |                   |                      |
| Number of prepaid card subscriptions               | –                 | –                 | –                 | –                 | 57,222            | 186,968           | 336,189              |
| Number of contract subscriptions                   | –                 | –                 | –                 | –                 | 18,341            | 28,169            | 30,347               |
| <b>Total subscriptions</b>                         | <b>–</b>          | <b>–</b>          | <b>–</b>          | <b>–</b>          | <b>75,563</b>     | <b>215,137</b>    | <b>366,536</b>       |
| <b>STET HELLAS S.A.</b>                            |                   |                   |                   |                   |                   |                   |                      |
| Number of prepaid card subscriptions               | 297,464           | 733,470           | 1,128,014         | 1,472,575         | 1,745,726         | 1,880,196         | 1,584,863            |
| Number of contract subscriptions                   | 391,150           | 449,281           | 517,378           | 662,763           | 767,916           | 792,071           | 817,914              |
| <b>Total subscriptions</b>                         | <b>688,614</b>    | <b>1,182,751</b>  | <b>1,645,392</b>  | <b>2,135,338</b>  | <b>2,513,642</b>  | <b>2,672,267</b>  | <b>2,402,777</b>     |
| <b>VODAFONE</b>                                    |                   |                   |                   |                   |                   |                   |                      |
| Number of prepaid card subscriptions               | 382,166           | 948,029           | 1,485,000         | 2,074,674         | 2,308,278         | 2,589,155         | Not Available        |
| Number of contract subscriptions                   | 686,466           | 715,180           | 741,000           | 810,198           | 910,439           | 1,041,915         | Not Available        |
| <b>Total subscriptions</b>                         | <b>1,068,632</b>  | <b>1,663,209</b>  | <b>2,226,000</b>  | <b>2,884,872</b>  | <b>3,218,717</b>  | <b>3,631,070</b>  | <b>Not Available</b> |
| <b>TOTALS</b>                                      |                   |                   |                   |                   |                   |                   |                      |
| Number of prepaid card subscriptions               | 716,314           | 2,052,085         | 3,468,960         | 5,029,014         | 6,066,123         | 6,933,526         | Not Available        |
| Number of contract subscriptions                   | 1,339,770         | 1,842,227         | 2,463,443         | 2,934,728         | 3,248,137         | 3,441,513         | Not Available        |
| <b>Total subscriptions</b>                         | <b>2,056,084</b>  | <b>3,894,312</b>  | <b>5,932,403</b>  | <b>7,963,742</b>  | <b>9,314,260</b>  | <b>10,375,039</b> | <b>Not Available</b> |

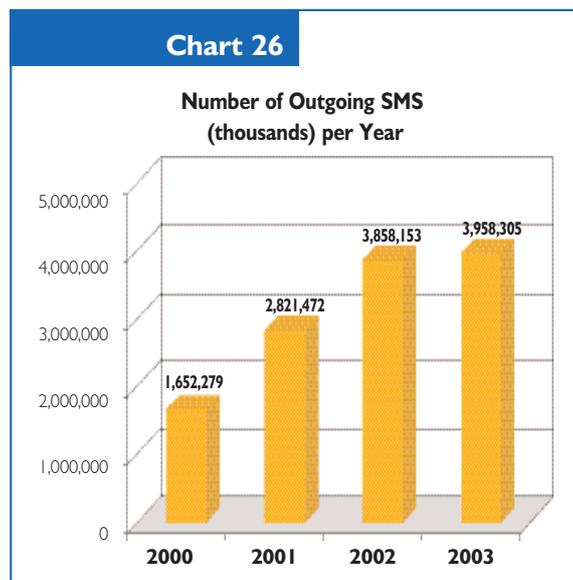


Source: EETT



Source: EETT

It is also observed that the sector's providers are steadily oriented towards the further development and exploitation of high added value services. Thus, all providers offer integrated services in the sector of information (stock exchange, weather, health, sports), in entertainment (movies, theatre, night clubs), as well as in recreation (special ringtones, logos, knowledge games). One of the basic sources of income is the Short Message Service (SMS), which is increasingly used (see Chart 26) by the public. In 2003, their number approached 4 billion messages. As far as the number of outgoing Multimedia Message Service (MMS), it is estimated to have amounted to 6,610,000 in 2003.



Source: EETT

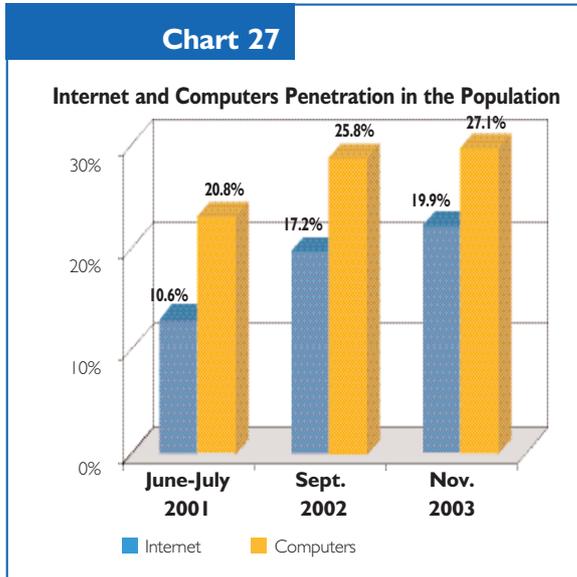
The provision of 3G Mobile Telephony services is highly anticipated. Among other this will enable the users to make a video-call, meaning that the users will be able to see their interlocutor on the screen of their mobile phone during the call, to connect to the Internet at a high speed and generally enjoy services, which demand high data transfer rates. The demand

for 3G services is expected to be especially high during the 2004 Olympic Games in our country. It is noted that 3G services, according to the 9<sup>th</sup> Report of the European Commission, were already being provided at the issue date of the Report (November 2003) at least in four EU countries (Italy, United Kingdom, Sweden and Austria).

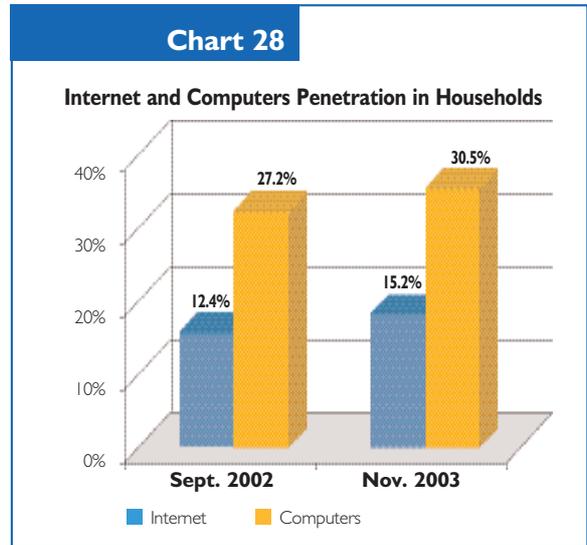


### 1.1.5. Internet

According to a recent pan-Hellenic market research executed on account of the National Research and Technology Network (GRNET), in the framework of the e-business Forum (<http://www.ebusinessforum.gr>), the penetration of Internet use in adult (>15 years old) population is estimated that in November 2003 amounted to 19.9% and the Internet users were approximately three fourths of computer users (see also Chart 27). As to the ownership of computers and connection of the household to the Internet, a relatively small increase was noted in relation to the previous year (Chart 28). According to the same source, the average usage hours of the Internet is estimated at 6.6 hours per week, from 6.3 hours estimated in September 2002.

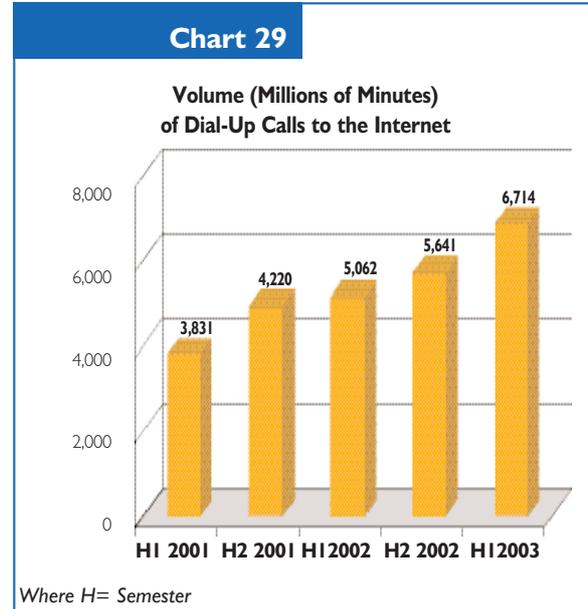


Source: Market Research for GRNET



Source: Market Research for GRNET

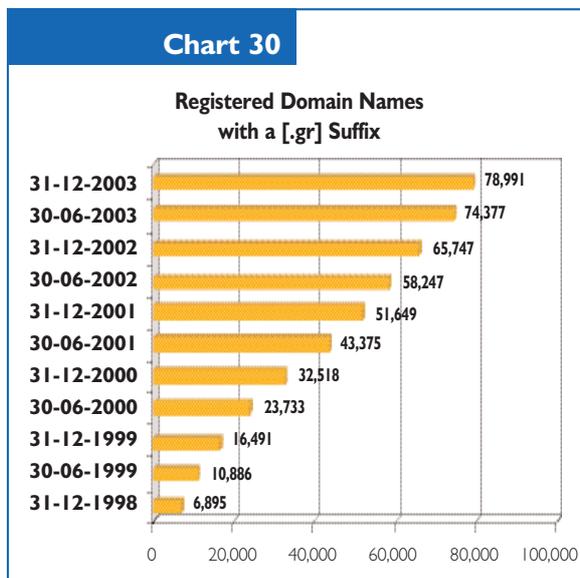
The increased Internet use during the last few years is also demonstrated by the significant increase of the total dial-up calls duration in the Internet, presented in Chart 29.



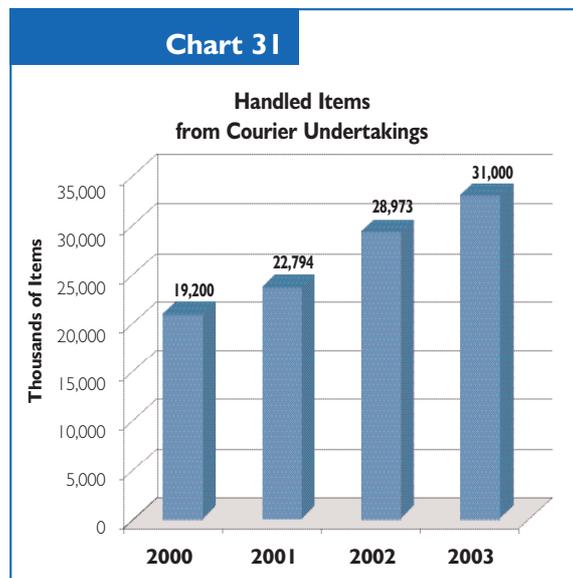
Where H= Semester

Source: EETT

Finally, in Chart 30, we present the development of the number of listed Domain Names with a [.gr] suffix through the years.



Source: Data from the Institute of Computer Science of the Foundation for Research and Technology Hellas (FORTH-ICS)<sup>4</sup>



Source: EETT

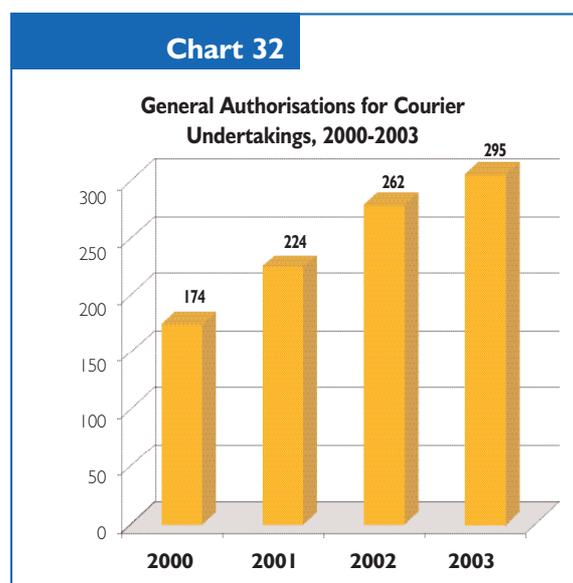
## I.2. Postal Services

### I.2.1. Courier Services Market

During the last years, the Courier Services market in Greece is growing at a fast rate. This is also evident from the total increase of the relevant market figures (number of active undertakings, volume of handled postal items, number of employees).

More specifically, the number of undertakings active in the Courier Service market during 2000-2003, was increased by 69.3%. It should be noted that in 2003, EETT granted licences to 54 undertakings. The turnover of undertakings in 2003 amounted to 203 million euros. Furthermore, the number of postal items handled by the undertakings is estimated to have amounted to 31 million, instead of 19.2 million in 2000, presenting for the period 2000-2003 an average annual increase rate of 17.3% (Chart 31).

In Chart 32, we present the increase in the number of licensed undertakings (General Authorisations) since the beginning of 2000 until the end of 2003. It is noted that a General Authorisation is required for the provision of services that are not part of the US, to which mostly belong Courier Services, as they are defined in article 1 of Law 2668/1998.



Source: EETT

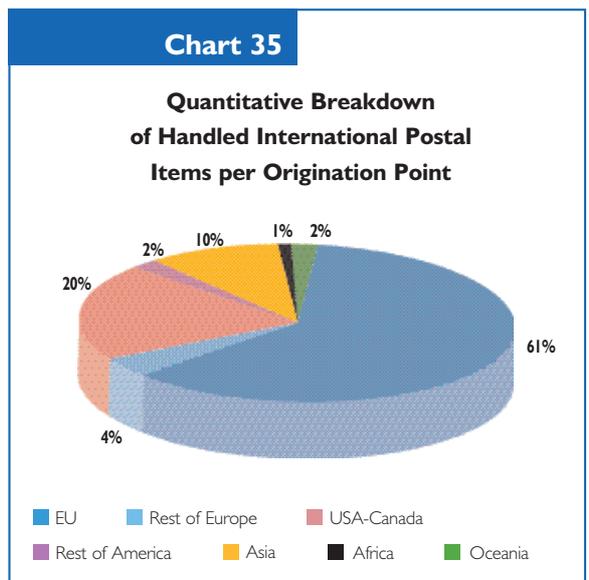
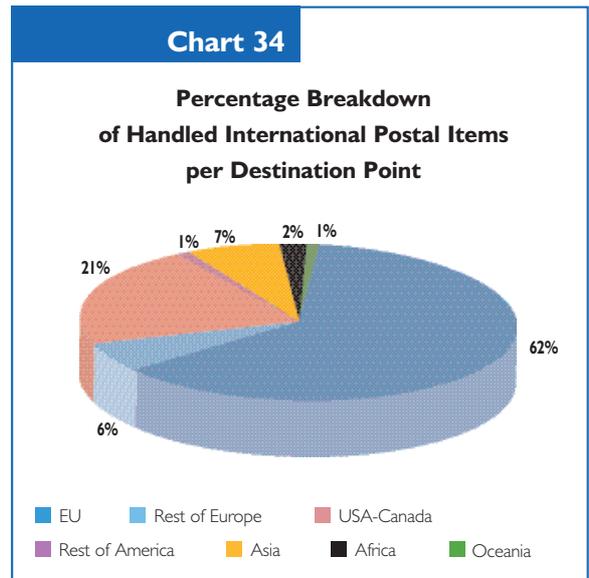
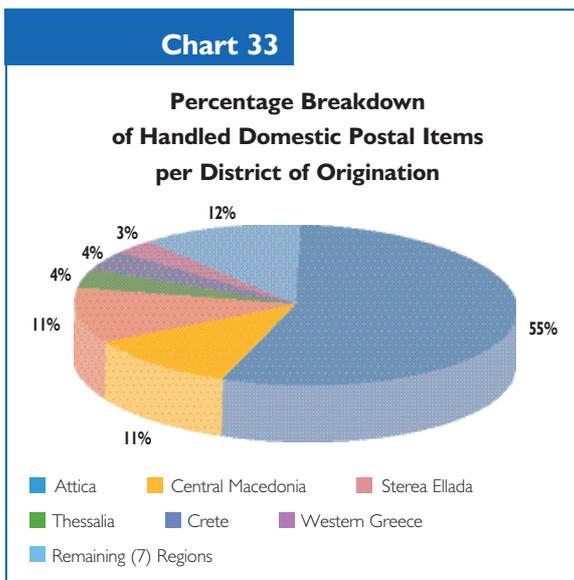
<sup>4</sup> The department of Domain Names Management (GR-Hostmaster) of the Institute of Computer Science of the Foundation for Research and Technology Hellas (FORTH-ICS) is responsible for the management of domain name assignment for the Top Level Domain [.gr] for EETT.



In 2003, the Courier Services market continued to be highly concentrated. Specifically, it is estimated that only 10 undertakings handled approximately 88% of the total volume of postal items, a percentage that corresponds to 89% of the total turnover of undertakings. The same number of undertakings handled in 2002, 86% of the total volume of items.

89% of postal items handled in the country, were domestic items and corresponded approximately to 68% of the total turnover, whereas 11% were international items (incoming and outgoing) and corresponded approximately to 32% of the total turnover. 55% of handled postal items originated from the district of Attica and of these, 96.3% was delivered inside the country and the rest 3.7% was delivered to countries abroad. Some of the most important districts for the market are Central Macedonia and Sterea Ellada, from which originates 22% (11% respectively for every district) of total handled postal items (Chart 33).

In Charts 34 and 35 we present the distribution of handled postal items to and from Greece. The most common destination/origination points were mostly EU, USA - Canada, Asia and the rest of Europe.





Focusing on the distribution of items based on weight categories, it is ascertained that the most important category of postal items is that weighing up to half a kilo, considering it comprises of 60% of handled items in total, whereas the respective percentages for the weight category from 0.5 - 2 kilos are 21% and 19% for parcels.

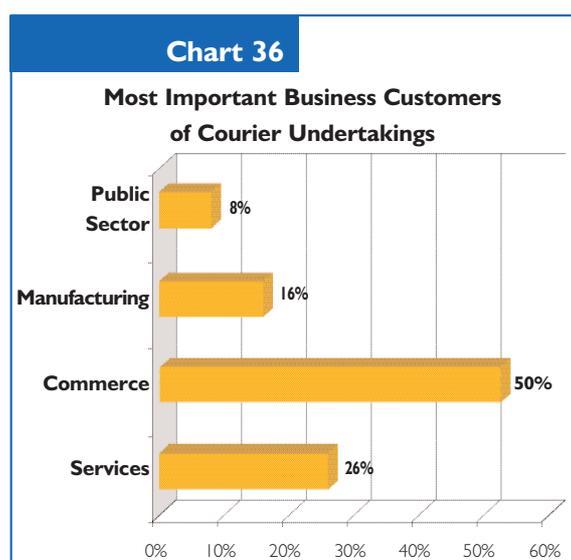
Furthermore, with regard to delivery times, in 2003, 88% of total items was delivered the next day and 3% on the same day, whereas these numbers were 83% and 8% respectively in 2002 (Table 4). It is noted that the delivery of part of the total items accomplished on the same day up to 2002, was completed on the next day.

Employment in the Courier Service market, has presented an increasing trend after 2000. More specifically, it is estimated that in 2003, the undertakings along with their Network, employed approximately 7,300 employees, instead of approximately 6,000 in 2002 (Table 5). Furthermore, during 2003, the undertakings employed relatively more part-time employees in relation to previous years (18% on the total of employees in 2003, instead of 8 - 9% during the period 2000 - 2002). This fact is due exclusively to the policy of a specific undertaking, which employed 850 individuals on a part-time basis in its effort to develop its Network.

The vast majority of employees were graduates of either compulsory or secondary education.

|           | 2000 | 2001 | 2002 | 2003 |
|-----------|------|------|------|------|
| Same day  | 8%   | 7%   | 8%   | 3%   |
| Next day  | 81%  | 86%  | 83%  | 88%  |
| More days | 11%  | 7%   | 9%   | 9%   |

The most valuable customers of Courier undertakings, as appearing in Chart 36, originate from the sectors of commerce (50%), provision of services (26%) and manufacturing (16%). Indicatively, as most important are mentioned the credit institutions, publishing houses, IT and telecommunications providers, shipping and insurance undertakings.



Source: EETT

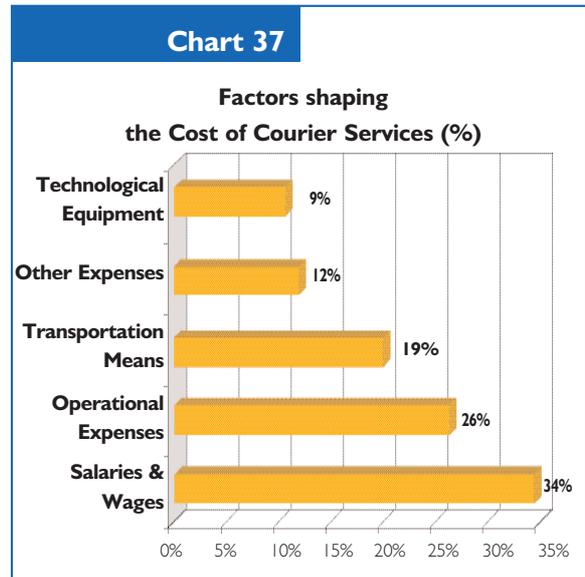
|                             | Total Number of Employees |              |              |              | Percentage Change |            |            |
|-----------------------------|---------------------------|--------------|--------------|--------------|-------------------|------------|------------|
|                             | 2000                      | 2001         | 2002         | 2003         | 2001/00           | 2002/01    | 2003/02    |
| <b>Full employment</b>      | 3,877                     | 4,805        | 5,528        | 5,917        | 24%               | 15%        | 7%         |
| <b>Part-time employment</b> | 373                       | 490          | 490          | 1,377        | 31%               | 0%         | 181%       |
| <b>TOTAL</b>                | <b>4,250</b>              | <b>5,295</b> | <b>6,018</b> | <b>7,294</b> | <b>25%</b>        | <b>14%</b> | <b>21%</b> |



The most important factors that determine the demand for Courier Services, are considered to be customer service and the reliability of the undertaking, as well as the price of provided services. As the most important factors that determine the provision of the specific services, are considered to a great extent the general economic conditions and the existing legal and regulatory framework.

The cost of Courier Services consists of staff wages (34%), operating expenses (26%), transportation means (19%) and other expenses (12%), which mostly concern the subcontracting expenses paid by Courier undertakings to other collaborating undertakings of the sector, so that a complete service can be provided (Chart 37).

The competition between undertakings is mostly driven by offered prices and quality of provided services, having as a result the significant increase of the negotiating capability of consumers in the choice of products. Finally, it is noted that the undertakings express lower interest in placing resources for advertising expenses, as well as for differentiating their products.



Source: EETT

## 1.2.2. Universal Service Mail Traffic

During the period 1999 - 2003, the volume of handled postal items concerning the US, presented a steady increase (533.5 million in 1999 instead of 615.1 million in 2003), retaining an average annual variation rate of 3.6%. Furthermore, the average annual variation rate of the turnover amounted to 13.4%.

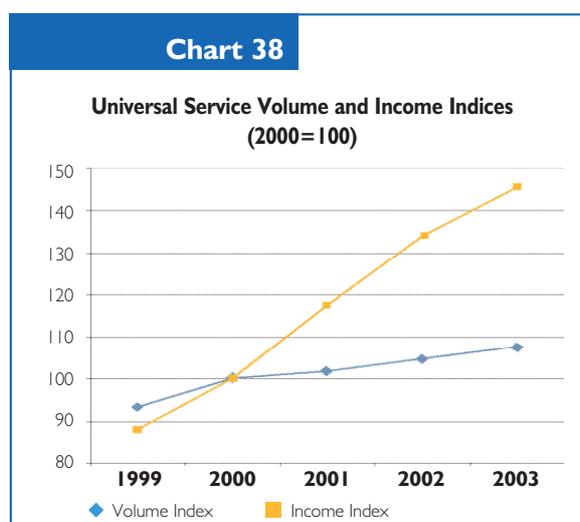
The most important US category in terms of volume is the Domestic mail, which in 2003 constituted 84.3% of the total US volume, instead of 78.4% in 1999. Respectively the International mail, in 2003, corresponded to 15.3% of the total volume instead of 21% in 1999. The category of Domestic and International parcels corresponded to a small percentage of the US volume.

| <b>Table 6</b>                                      |             |             |             |             |             |
|---|-------------|-------------|-------------|-------------|-------------|
| <b>Postal Universal Service Traffic 1999 - 2003</b> |             |             |             |             |             |
|   | 1999        | 2000        | 2001        | 2002        | 2003*       |
| Total of postal items                               | 533,524,593 | 571,786,808 | 582,212,123 | 598,441,707 | 615,131,000 |
| Annual Percentage Change                            | -           | 7.2%        | 1.8%        | 2.8%        | 2.8%        |
| Change since 2000                                   | 93.3        | 100         | 101.8       | 104.6       | 107.6       |

\*Estimate (actual data for the first nine months, forecast for the last trimester)

| <b>Table 7</b>                                       |             |             |             |             |             |
|--|-------------|-------------|-------------|-------------|-------------|
| <b>Universal Service Revenue 1999 - 2003 (euros)</b> |             |             |             |             |             |
|  | 1999        | 2000        | 2001        | 2002        | 2003*       |
| Total revenue  | 224,974,591 | 255,842,692 | 300,042,840 | 342,546,634 | 372,186,105 |
| Annual Percentage Change                             | -           | 13.7%       | 17.3%       | 14.2%       | 8.7%        |
| Change since 2000                                    | 87.9        | 100         | 117.3       | 133.9       | 145.5       |

\*Estimate (actual data for the first nine months, forecast for the last trimester)



Source: EETT



### 1.2.3. Universal Service Tariffs

In this Section we present the evolution of tariffs for the provision of US by ELTA for the most important services and specifically for the First and Second Priority Domestic

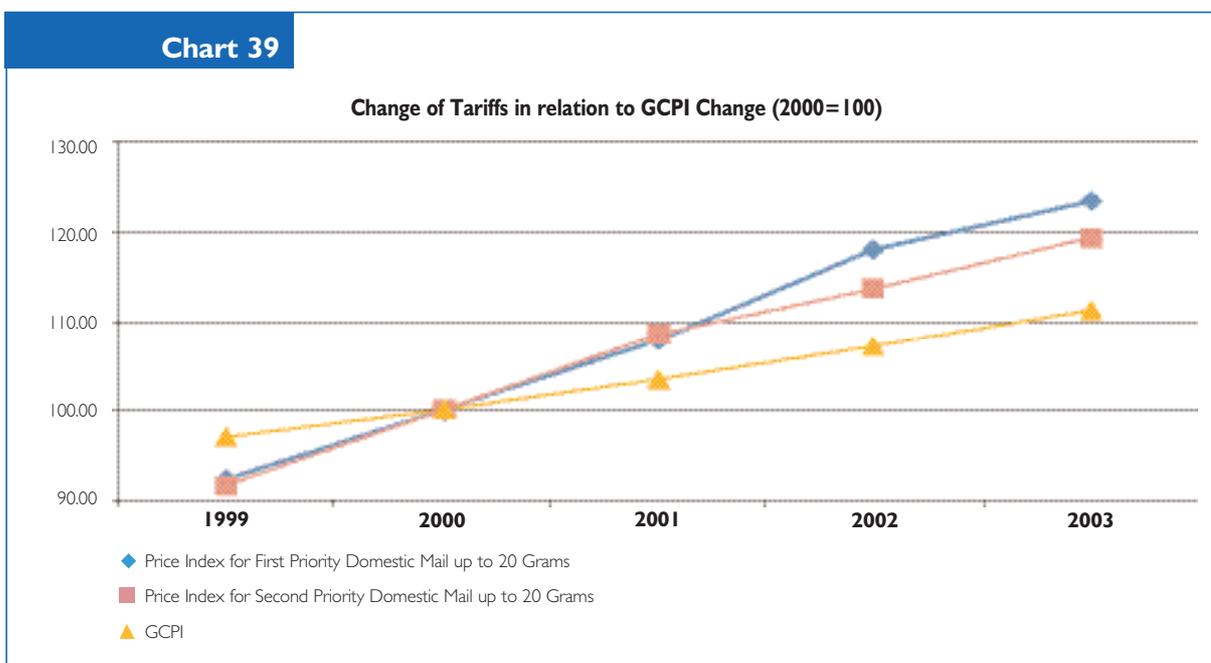
mail, weighing up to 20 grams, in relation to the evolution of the General Consumer Price Index-GCPI<sup>5</sup> (see Tables 8 and 9 as well as Chart 39).

| <b>Table 8</b>  |                  |                |                |                |
|---|------------------|----------------|----------------|----------------|
| <b>Annual Percentage Changes of Tariffs in relation to GCPI (1999 - 2003)</b> |                  |                |                |                |
|   | <b>2000/1999</b> | <b>2001/00</b> | <b>2002/01</b> | <b>2003/02</b> |
| First Priority Domestic Mail, up to 20 grams                                  | 8.3%             | 7.7%           | 9.5%           | 4.4%           |
| Second Priority Domestic Mail, up to 20 grams                                 | 9.1%             | 8.3%           | 4.8%           | 5.0%           |
| GCPI  | 3.1%             | 3.4%           | 3.6%           | 3.7%           |

Source: EETT

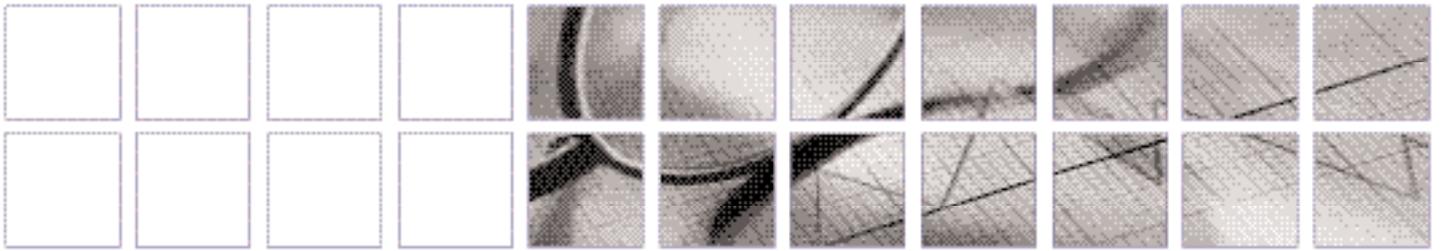
| <b>Table 9</b>   |             |             |             |             |             |
|--|-------------|-------------|-------------|-------------|-------------|
| <b>Change of Tariffs in relation to GCPI Change (2000 = 100)</b> |             |             |             |             |             |
|  | <b>1999</b> | <b>2000</b> | <b>2001</b> | <b>2002</b> | <b>2003</b> |
| First Priority Domestic Mail, up to 20 grams                     | 92.31       | 100.00      | 107.69      | 117.95      | 123.19      |
| Second Priority Domestic Mail, up to 20 grams                    | 91.67       | 100.00      | 108.33      | 113.58      | 119.26      |
| GCPI   | 96.99       | 100.00      | 103.40      | 107.12      | 111.09      |

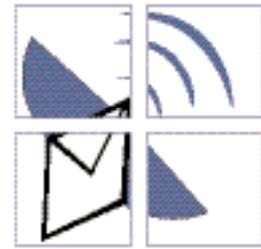
Source: EETT



Source: EETT

<sup>5</sup> As it is calculated by the National Statistical Service of Greece.





## CONSUMER RIGHTS AND BENEFITS



## 2. Consumer Rights and Benefits

In the following Chapter we present EETT's actions for the protection of consumers, as well as the establishment of a proper mechanism for safeguarding their interests and providing them with adequate information. We mention EETT's actions to ensure the legal operation of antennas and of the Radio Equipment and Telecommunications Terminal Equipment (RTTE), as well as the establishment of a regulatory framework, capable to ensure a minimum level of organisation for the Courier undertakings and quality of services. The benefits that result for the consumers from the liberalisation and the smooth operation of the telecommunications and postal markets are underlined. In this framework and as a result of the competition and technological advances, some of the new services available now to consumers are presented, services, which provide them with more choices.

### 2.1. Consumer Protection and Information

#### 2.1.1. Consumer Service Sector

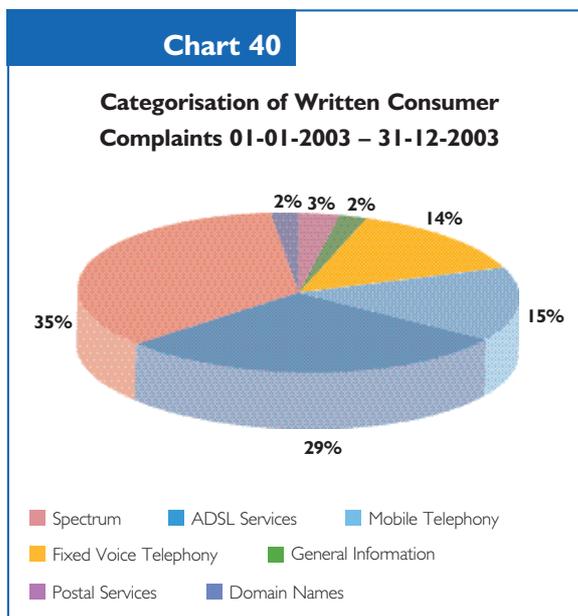
EETT, in the framework of its responsibilities, sees to the protection of consumer rights and the safeguarding of their interests. In 2003, among its main goals were the service and provision of information to consumers, as well as the immediate management of consumer requests/ complaints, through the Consumer Service Sector (CSS), for issues concerning telecommunications and postal services. The CSS was formed in November 2002 and has the following principal aims:

- Informing the consumers on ways to safeguard their interests, on developments in the telecommunications and postal markets and on their choices (see next sections).

- Managing the consumers requests/ complaints received daily. Especially in the case of complaints, EETT proceeds immediately to the examination of issues and intervenes, where this is necessary, aiming to manage the complaints in the most effective manner.
- Tracking of issues that require a regulatory intervention by EETT and the adoption of measures, aiming to defend the rights of all consumers and to improve the terms of provision of telecommunications and postal services.

In 2003, the CSS received 1,957 written requests/ complaints by consumers, a fact that proves the active participation of consumers in the new environment that is shaped by market liberalisation. The result of the recording and the most important issues that were mentioned in the complaints, are presented in Table 10.

| Table 10   |          |           |
|--|----------|-----------|
| Written Requests/ Complaints by Consumers – 2003                             |          |           |
| Category   | %        |           |
| ➤ <b>TELECOMMUNICATIONS SERVICES (total)</b>                                 |          | <b>95</b> |
| <b>Frequency Spectrum</b><br>(antennas and interferences)                    | 35       |           |
| <b>ADSL Services</b><br>(availability and tariffs)                           | 29       |           |
| <b>Mobile Telephony</b><br>(availability of services, tariffs, quality)      | 15       |           |
| <b>Fixed Voice Telephony</b><br>(availability of services, tariffs, quality) | 14       |           |
| <b>Domain Names with a [.gr] suffix - Internet</b>                           | <b>2</b> |           |
| ➤ <b>POSTAL SERVICES</b>   |          | <b>3</b>  |
| ➤ <b>GENERAL INFORMATION</b>   |          | <b>2</b>  |



Furthermore, in 2003, EETT Help Line (801 11000 80), which is dedicated to consumer service, received 2,356 calls on issues concerning the above.

EETT's goal for 2004 is for the CSS to constitute a central access point for consumers, in order to effectively resolve issues of concern and provide them with valid information. Furthermore, EETT will elaborate the data from complaints in order to improve the operation of the telecommunications and postal sector, to the benefit of consumers.

### 2.1.2. Information Leaflets

CSS, as mentioned above, aims at the implementation of actions in order to continuously inform and educate the consumers. The above goal is based on the fact that a properly informed consumer proceeds to the best choices, and effectively utilises the multiple possibilities provided by a liberalised market. In this framework, in 2003, the CSS proceeded to the publication of three information leaflets. The usability, the targeted topics, the simple and comprehensive presentation of topics,

the analysis of technical terms and the provision of examples, were the principal characteristics of these leaflets.

#### 1. "Now consumers can choose"

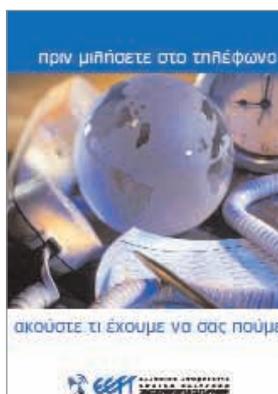
In this information leaflet, which was published in June 2003, the new choices for consumers were presented in



detail, as a result of the full liberalisation of the telecommunications market and the successful implementation of the new National Numbering Plan (NNP). More specifically, the Carrier Selection and Carrier Pre-selection, the Number Portability and the Personal Numbers were analysed in detail.

#### 2. "Before you talk on the phone... listen to what we have to tell you"

This leaflet, which was published in October 2003, presented in detail the calls' pricing policies of providers. The main goal was to familiarise consumers with basic issues that they must consider before they choose providers of fixed and mobile telephony. Thus, it contained information on national and international calls, on the call duration fee, the minimum time of charge, the call set-up, the



international roaming. At the same time, it also provided simple examples on the manner in which consumers can choose the most advantageous offer. Furthermore, the leaflet provided, in the form of a summary table, an indicative picture of

the price range providers charge for some of their services.



### 3. "Universal Postal Service... Courier Services... Let's get informed"

The topic of the leaflet, issued in November 2003, was the information provided to consumers on issues



concerning postal services in general. The leaflet, among others, included information on the following:

➤ **Universal Postal Service:** Which services does the Universal Service (US) include, how often must the distribution be made and what are the

delivery times for each category of postal items.

- **Courier Services:** Which services are provided to the consumers and what they have to know in order to make the right choices.
- The Charter of Obligations to the Consumer (COC) and compensation issues.
- EETT's role and the methods for the settlement of disputes.

The above information leaflets, which were particularly popular to the wider public, are available at EETT's website.

#### 2.1.3. Control of Telecommunications Providers – Consumers Contracts

The telecommunications providers of fixed and mobile telephony are under the obligation to display a standardised contract text, which in a consolidated manner regulates their relations with consumers. The terms included in this text, must be presented explicitly and in a simple manner so that the consumer can fully comprehend the terms of the contract.

More specifically, the general terms are inscribed in

clear characters in the back view of the contract. The contracts for the provision of services to consumers have the form of an accession agreement –that is they are binding for both sides- and are governed by the relevant provisions of Law 2251/1994.

Each proposed contract by telecommunications providers of fixed or mobile telephony, is notified to EETT at least two months before its implementation. Then, EETT proceeds to the detailed examination of the contractual terms and within two months from the submission of the proposed standardised contract, it can request from the provider to amend specific terms or add new ones.

During 2003, new contract drafts were submitted to EETT by two fixed voice telephony providers and two mobile telephony providers. EETT examined the drafts in order to ascertain their level of compliance with the national and community legislation, and proceeded to making comments, which in general concerned the obligations to:

- State the minimum duration of the contract, according to the jurisprudence of the Supreme Court<sup>6</sup>.
- Explicitly define the provided service and state the terms and conditions of provision, including the relevant charge.
- State in detail the terms and conditions that concern the payment of compensation or/ and return of money to consumers, in the case of an ineffective provision of services, or in case the services are not provided at all.
- Explicitly mention the procedure for the settlement of disputes, as it is defined by the legislation in force and the Authorisation of the providers.
- Define the procedure for termination of services that constitute the object of the contract, in case of termination of agreement.

<sup>6</sup> Supreme Court Decision 296/2001.



EETT's goal is to ensure that the contracts in question include all the terms provided by the legislation in force, so that consumers are protected.

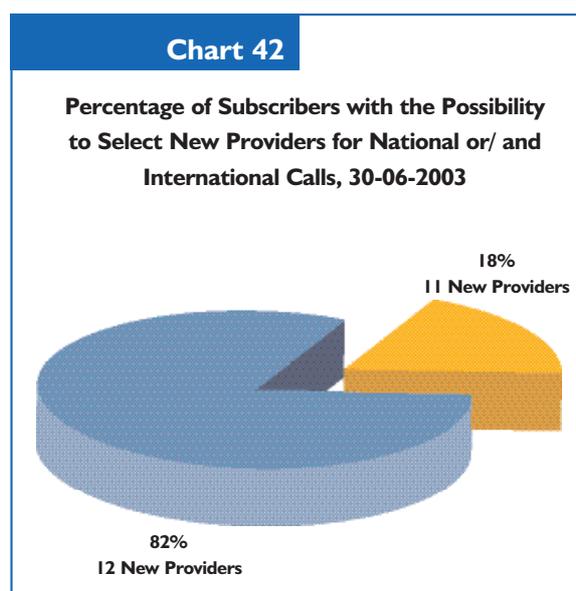
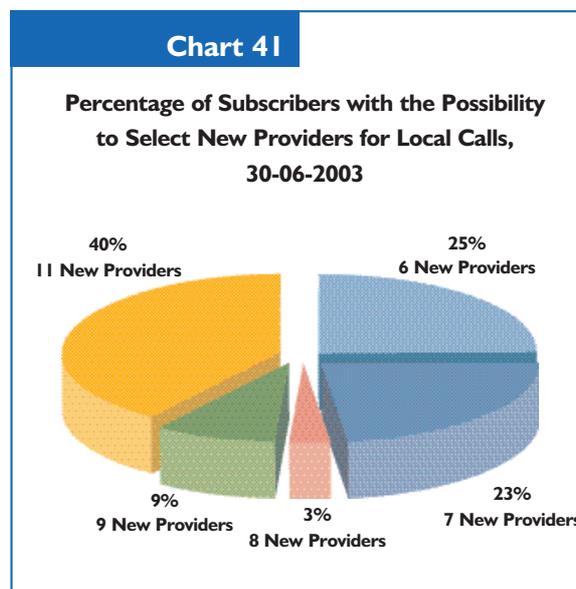
## 2.2. Telecommunications – Radio Communications

### 2.2.1. Benefits from Competition

The entry of new providers in the telecommunications market led to the establishment of competition and brought various benefits to the consumer. More specifically, the entry of new fixed voice telephony providers (see also Section 1.1.), had as a primary result the increase of consumer choices in what concerns the provider of their telephone service. As it can be seen in Charts 41 and 42, the majority of fixed voice telephony subscribers has now a choice among new providers.

The intense competition between new providers and OTE brought about, as it was expected, significant reductions in their tariffs. It is noted that the cost of a call varies and depends from, among other things, the providers' commercial packages. It is estimated that after the relevant EETT Decision<sup>7</sup>, by which the new pricing policy of OTE was approved under conditions, the competition will be further intensified and at the same time new reductions of voice telephony tariffs are expected by new providers, to the benefit of consumers.

Further on, we present comparative data for December 2003, concerning the cost of different kinds of calls (local, national, international and calls to mobiles), made on working days and during rush hours. In the comparison, we take into consideration the basic programmes of each provider and not



special programmes offered, which may be more affordable. Furthermore, we don't take into consideration the possible existence of a fixed charge or free of charge time.

More specifically, Chart 43 (page 54), depicts the real cost of a local call of three and ten minutes duration. All providers use as a charge unit the minute and the charge's range varies from 0.024 euros/minute to 0.026

<sup>7</sup> OTE's new pricing policy was approved by EETT on December 17<sup>th</sup>, 2003 (EETT Decision 310/30/2003, GG Issue 1925/B/24-12-2003) and its commercial implementation began on December 31<sup>st</sup>, 2003.



euros/minute. The cost of a national call of three and ten minutes –where the charge unit is for most providers the second- is depicted in Chart 44 (page 54).

The charging of calls to mobile phones is more complicated. Specifically, it includes a minimum charge, which the consumer pays, irrespectively of whether the call is shorter than the predetermined minimum duration, as well as the charge unit, which usually varies from provider to provider. Chart 45 (page 55) shows the real cost of a one minute call, for all four mobile telephony providers, with most of them using the second as a charge unit.

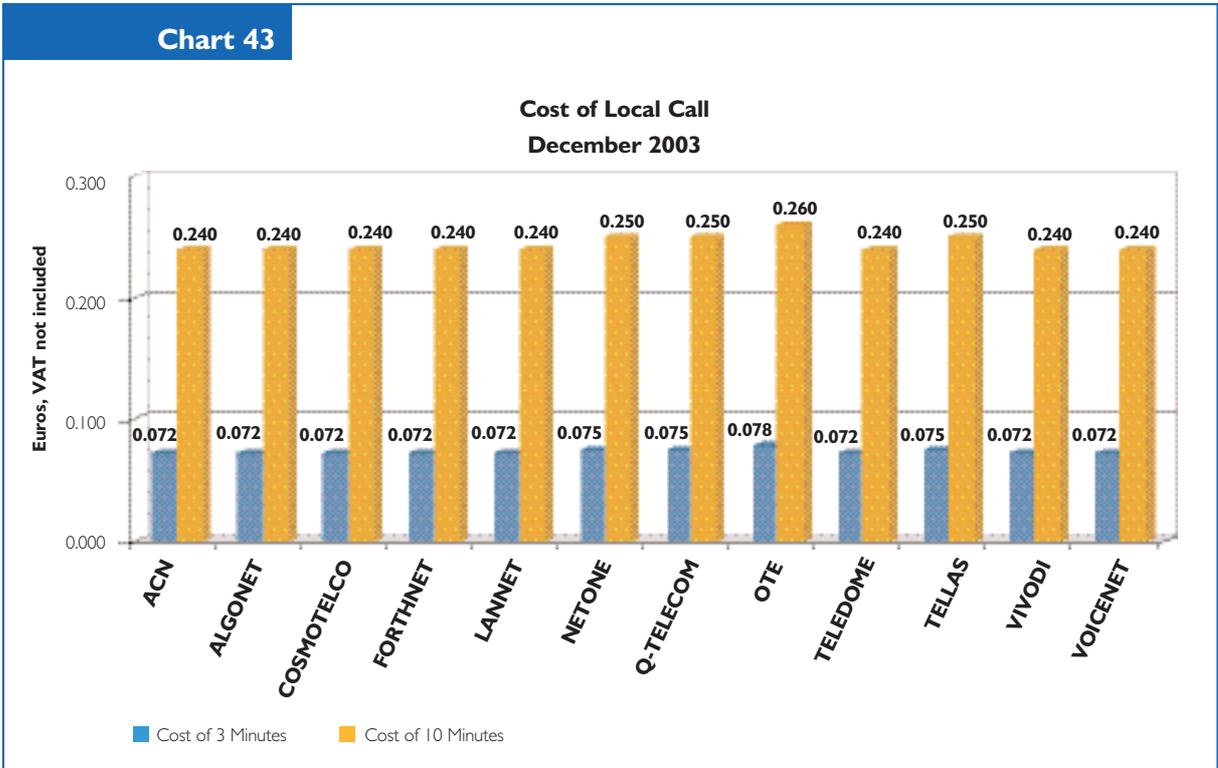
In what concerns international calls, there are various charging zones per provider, without however any important differences in the selection of countries that

form the zones of each provider. For example, the first zone usually includes all calls to the countries of the European Union (EU), the USA, Japan and Australia. Indicatively, in Chart 46 (page 55) you can see the cost of a three minute international call to a fixed phone in the United Kingdom, the USA, Russia and Brazil.

It is stressed that the comparative data presented in this sub-section, corresponds to December 2003 and does not constitute a market guide. In the new telecommunications environment, consumers active participation is necessary, in order to make the best choices. It is noted that the best choice of a fixed voice telephony provider is directly linked to each consumer's habits. The type of calls, their duration, the calling time, constitute important elements that facilitate the relevant comparisons.

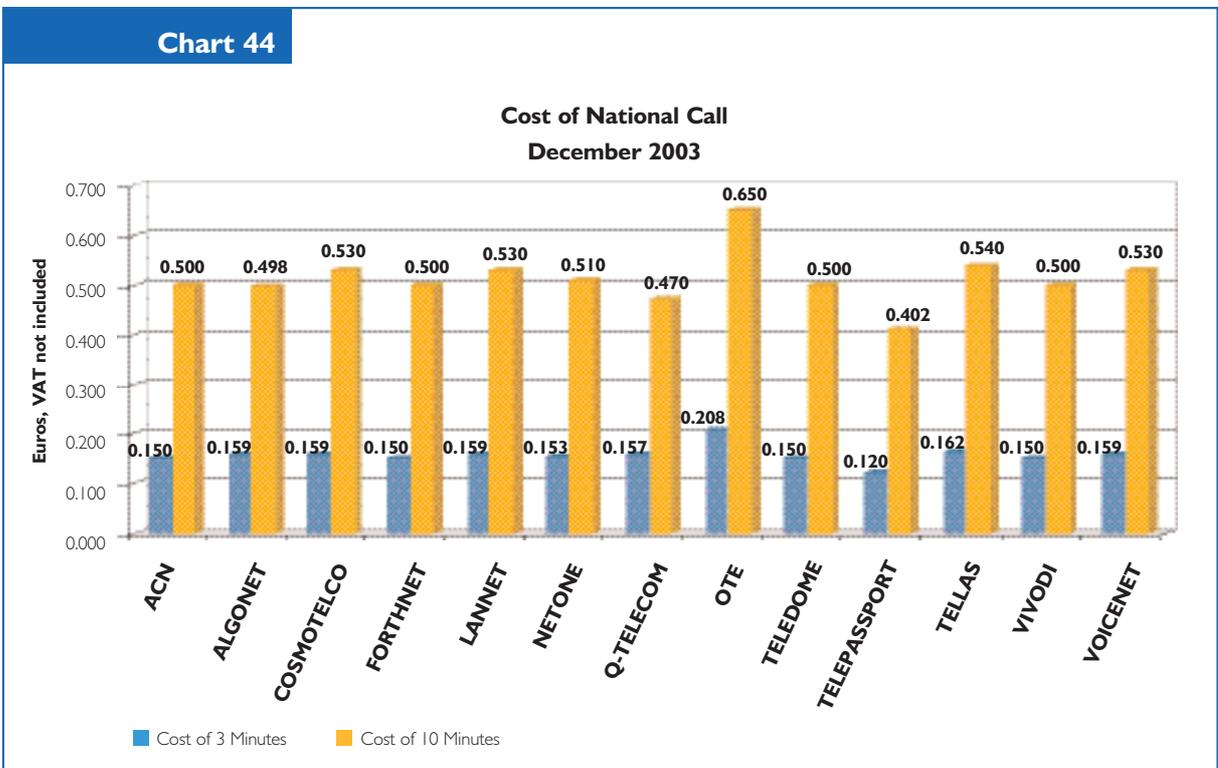


Chart 43



Source: EETT

Chart 44

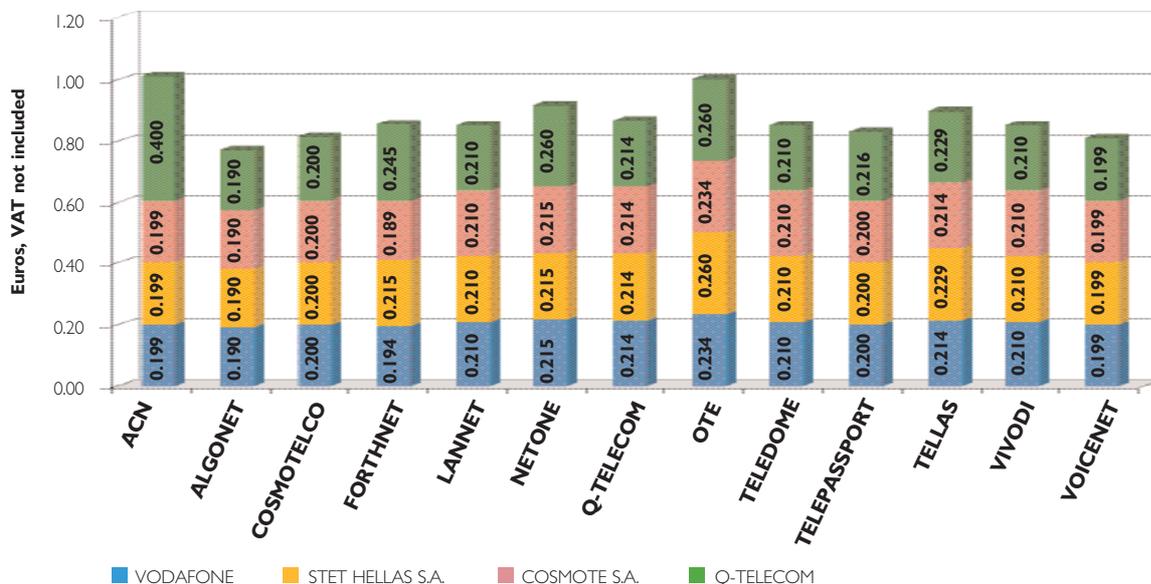


Source: EETT



Chart 45

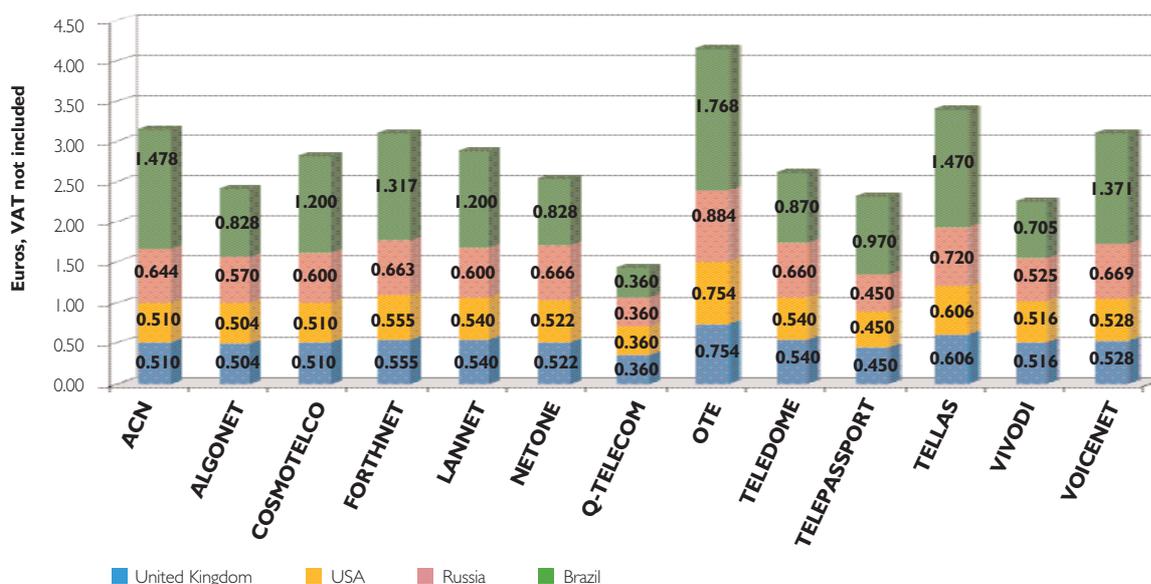
Cost of a 1-Minute Call from a Fixed to a Mobile Telephone  
December 2003



Source: EETT

Chart 46

Cost of a 3-Minute International Call to a Fixed Telephone  
December 2003



Source: EETT

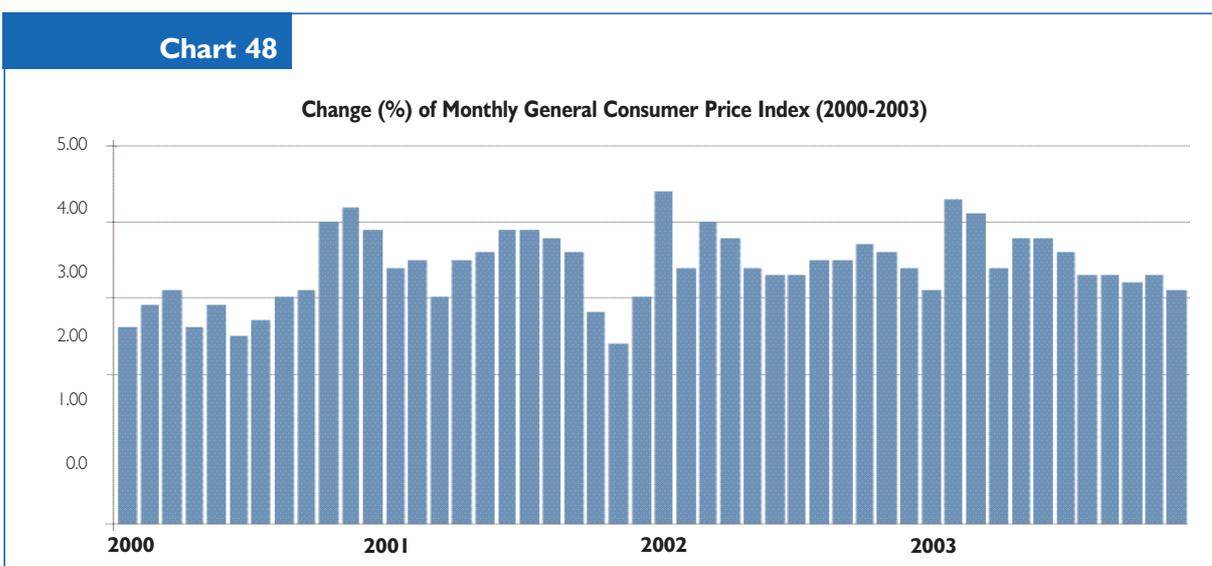
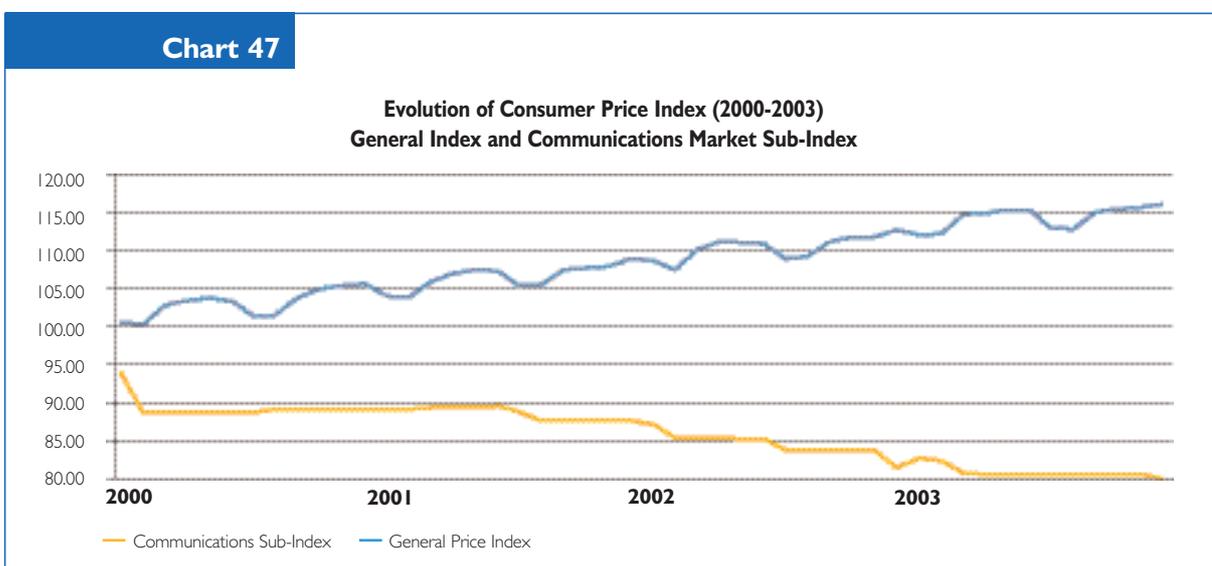


Finally, a very interesting element that reveals the significant reductions of prices, observed in the telecommunications sector, is the Consumer Price Index for Communications, from data collected by the National Statistical Service-NSS (Charts 47, 48 and 49). This particular Index, in combination with the General Consumer Price Index, certifies the positive results of market liberalisation.

### 2.2.2. New Services

#### Carrier Pre-Selection – Carrier Selection

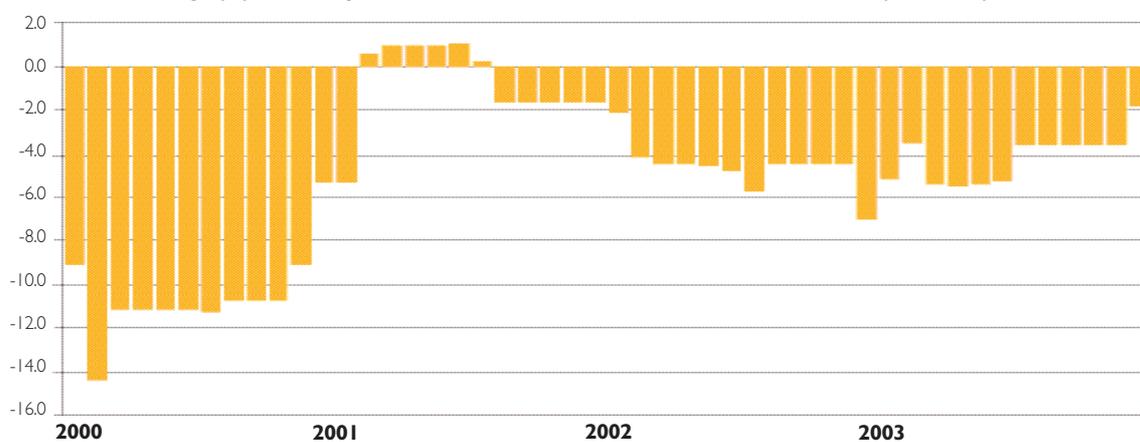
The full liberalisation of telecommunications had as a result the entry of new providers in the telecommunications market and especially in the market of fixed voice telephony. The provision of voice telephony services to consumers by new providers, is based on the services of Carrier Selection and Carrier Pre-selection.





**Chart 49**

**Change (%) of Monthly Consumer Price Index for the Communications Market (2000-2003)**



Source: NSS

It should be mentioned that the Carrier Selection, which signaled the commencement of full liberalisation of the telecommunications market, had been provided since 2002. Carrier Pre-selection was available to consumers by the end of April 2003.

Carrier Pre-selection, based on the relevant Regulation<sup>8</sup> by EETT, is available to consumers for the following call categories:

- ▶ Possibility 1: International Calls.
- ▶ Possibility 2: National Calls and Calls to Mobiles.
- ▶ Possibility 3: International, Local, National Calls and Calls to Mobiles.

The specific service is expected to further intensify competition in the fixed voice telephony market.

**Domain Names**

The year 2003 was important for the assignment of Domain Names with a [.gr] suffix, due to the fact that

the newly implemented EETT Regulation<sup>9</sup> fully reforms their management and assignment framework.

The new Regulation signals the removal of a series of restrictions of the previous framework and specifically provides:

- ▶ The possibility to assign Names to any person or legal entity, irrespectively of nationality.
- ▶ The possibility to assign an infinite number of Names to any person or legal entity.
- ▶ The clarification of conditions, according to which the assignment of a Name is possible or not.
- ▶ The possibility to resort to EETT in case there is a problem with the assignment of a Name.

With the new Regulation, EETT aims at the better management of Domain Names, as well as at the invigoration of the Internet market, in order to maximise the benefits for the users.

The above interventions contributed to the increase of applications for the assignment of Domain Names, thus

<sup>8</sup> EETT Decision 254/70/2002, GG Issue 773/B/21-06-2002.

<sup>9</sup> EETT Decision 268/73/2002, GG Issue 1617/B/31-12-2002.



the total number of Domain Names presented a 16% increase in relation to 2002. It is also stressed that EETT successfully handled problems and complaints for Domain Names assignments, especially in what concerns company names, distinctive titles, trade marks etc.

### Universal Service

US is a predefined minimum set of telecommunications services of a specific quality (EETT by a relative Decision<sup>10</sup> had defined the content of US), which is provided to every citizen, regardless of geographic location, at an affordable price. During 2003, EETT focused on the implementation of the above, including the Universal Service Provider (USP) and the other providers' compliance control with the obligations that result from the regulatory framework in force. It is noted that until 2005, OTE has been designated as USP<sup>11</sup>.

More specifically, concerning the USP's obligation to issue a unified telephone directory, EETT coordinated and monitored the actions of telecommunications providers for its implementation and set the timeframe for its issuance.

As far as the facilitations and provisions for persons with special needs, the details concerning the definition of the various beneficiary categories and the implementation of the provisions were set. The USP took measures, including the issuance of a Special Circular on the upholding of its relevant obligations. It is worth mentioning the fact that Greece is counted among the member-states that have taken initiatives and adopted proper measures in the sector of telecommunications services provision in order to facilitate the everyday life of persons with special needs.

Specifically, the USP has, among others, the obligation to provide the following facilitations and provisions to

persons with special needs:

- To persons with kidney deficiencies at a final stage, free of charge airtime of a value equal to 1,000 minutes of local charge, monthly for a telephone connection.
- To persons with sight, hearing deficiencies as well as to persons with a handicap over 67%, to families of persons with severe intellectual deficiencies, persons with paraplegia or suffering from cerebral paralysis with a handicap percentage over 67%, a discount of 16 euros on the total monthly charge for use of data transmission services. Furthermore, beneficiaries of this discount can also be those set by law or by contract as practicing the wider supervision of the above persons (parental responsibility, guardianship).
- To blind persons and persons with serious sight impairments, the possibility to make free of charge 20 calls per month to a service of telephone catalogue information.
- To blind persons and persons with serious sight impairments, the service of selective barring of outgoing calls for free.

EETT's goal is to ensure the effective provision of high quality telecommunications services to all citizens of the country and to strengthen social cohesion. In this context, it especially sees to the ensuring of access, quality and price terms during the provision of telecommunications services to people with special needs, thus encouraging their equal participation in the Information Society and the discouragement of social exclusion phenomena.

### 2.2.3. Broadband Services

As broadband, are characterised these services that require high speed data transmission, as for example high speed Internet access and video conference. One

<sup>10</sup> EETT Decision 255/83/2002, GG Issue 874/B/12-07-2002.

<sup>11</sup> EETT Decision 264/140/04-10-2002, GG Issue 1368/B/24-10-2002.



of the main goals for 2003 was the promotion of broadband services and the ensuring of the unimpeded access to networks and services of broadband communications in Greece.

In this context, EETT proceeded to a series of actions, which on one hand focused on the introduction and promotion of new technologies and on the other hand on the implementation of OTE's legal obligations. Specifically:

- EETT paid particular attention to the implementation of the Local Loop Unbundling (LLU) of OTE. It is noted that the LLU is suitable for the provision of broadband services to end-users by interested telecommunications providers, through the use of OTE's access network infrastructure. In March 2003, after a relevant cost control, new prices were set for the LLU, which were much lower than the ones prevailed until then. The result was the increase of demand and provision of LLU by telecommunications providers.
- EETT monitored the provision of ADSL access by OTE to end-users and telecommunications providers. Specifically, in May 2003, OTE announced the commencement of the service's commercial operation and EETT was in close collaboration with OTE and with the interested telecommunications providers in order to ensure the rapid service provision, under equal and transparent terms. The result of the above, was that users enjoyed rapid access to the Internet through ADSL, at decreasing prices due to the developing competition.
- In December 2003, after the completion of OTE's cost control, new prices were defined for the provision of Leased Lines. The telecommunications providers, through Leased Lines, have the possibility to provide broadband services to consumers.
- During 2003, EETT granted 3 Individual Licences for the provision of services through W-LAN technologies. The W-LAN technology, which

allows the wireless broadband access of end-users, has great appeal in Europe and in the USA and presents prospects of progress in Greece also. It is noted that it allows the wireless connection of computers at a central Access Point and is usually used for rapid access to the Internet in big urban centers and especially in big building complexes, such as airports, universities, and schools.

- EETT monitored closely the implementation course of 3G Mobile Networks, trying to resolve any issues arisen. In the beginning of 2004, the provision of 3G Mobile Telephony Services by providers is expected, and the users will be able to enjoy broadband services through mobile phones.

During 2004, EETT will focus on the control and monitoring of the relevant market, with the aim to facilitate the provision of higher quality and affordable broadband services to consumers, and the penetration of broadband services in our country.

#### **2.2.4. Control of Antenna Installations – Interference Controls**

The penetration presented by mobile telephony in the Greek market, as well as the introduction of all the above-mentioned new telecommunications applications relying on wireless networks, such as Fixed Wireless Access (FWA) and 3G Universal Mobile Telecommunication System (UMTS), multiply the need for installations of antenna mast constructions, in order to ensure the communication in the entire Greek state.

EETT, aiming at the further development of the telecommunications networks, pursues the strict abiding by the existing legislation, having as its main concern the protection of the environment and the citizens' health. In this context, EETT proceeds to



controls/ autopsies of antenna installations, so as to ensure their legal operation.

In 2003, EETT received requests/complaints by citizens and institutions, concerning antenna installations, which referred to:

- 683 cases of mobile telephony antenna mast constructions.
- 17 cases of radio amateurs.
- 15 cases of Private Mobile Radio (PMR) Networks.

Specifically, as to illegal installations of mobile telephony antenna mast constructions, the requests/complaints notified to EETT substantially increased during the second semester of 2003. This increase was mostly due to the people's concern for the safety provided by the set radiation limits and whether or not these limits are upheld by the providers of mobile telephony services.

It is worth mentioning that the larger the number of a provider's antennas in a specific area, the smaller the electromagnetic radiation emitted by each antenna.

Furthermore, based on the Joint Ministerial Decision (JMD)<sup>12</sup> on "Protection measures of the public from the operation of land-based antenna installations", clear conditions have been set, so that prior to the issuance of each Licence for a Mobile Telephony Antenna Mast Construction, the suitable protection measures are taken for the public. As it is provided in the same JMD, responsible for the protection of the general public from the non-ionizing radiations is the Hellenic Atomic Energy Commission (HAEC). EETT is responsible for the provision of antenna mast construction licences. For each licence, the concordant opinion of HAEC is required, in what concerns the safe limits of the

emitted radiation. In any case, EETT proceeds to a detailed examination of all necessary documents in order to ensure the abiding by the conditions provided by the law.

In the cases of illegal antenna mast constructions, EETT intervenes by executing the necessary autopsies/controls, in order to ascertain their owner and to impose the administrative sanctions provided by law. Following the issuance of a relevant Decision, EETT informs the competent Town Planning Department and the Public Prosecutor, in order to ensure the removal of each illegal installation and to impose the relevant penal sanctions, as provided by Law 2801/2000.

Besides the complaints that concerned antenna installations, EETT became the recipient of 44 consumer complaints for interferences in their television or radio receivers. In these cases, it proceeded to the necessary controls with the aim to track the source of interference and to all necessary actions in order to resolve the problem.

### 2.2.5. Radio Equipment and Telecommunications Terminal Equipment

Radio equipment is every equipment, which includes a transmitter and/or receiver and provides radio wave communication through the use of spectrum. Examples of radio equipment include mobile phones, satellite terminals, Citizen Band (CB) devices and radiotelephones on ships, pagers, cordless phones, transponders, short range devices (bluetooth applications, remote controls, garage wireless control systems, crane remote control systems, cordless microphones, wireless local area network equipment, and remote control toys).

<sup>12</sup> JMD 53571/3839/2000, GG Issue 1105/B/06-09-2000.



Telecommunications terminal equipment is the equipment connected, either directly or indirectly, by any means, to telecommunications networks (mobile telephony networks, public analogue and digital telephony networks as well as data networks), for the provision of accessible services to the public. Examples of telecommunications terminal equipment are fixed and mobile telephones, answering machines, modems, and telephone exchanges.

According to Law 2867/2000 and Presidential Decree 44/2002, EETT is competent for any issue concerning Radio Equipment and Telecommunications Terminal Equipment (RTTE).

The regime of placing on the market and use of the aforementioned equipment, was defined on a European level through an institutional framework that was gradually harmonised in all EU member-states. This fact, facilitated the introduction of new products in the market, as many obstacles encountered by manufacturers while trying to place their products in the European market, were lifted.

The placing on the market and use of RTTE is now liberalised in all EU member-states, provided that the equipment conforms to the following "essential requirements":

- ▶ Does not create hazards for health and safety.
- ▶ Operates sufficiently in the electromagnetic environment, without causing electromagnetic disturbances (protection for electromagnetic compatibility).
- ▶ It is designed and manufactured in a way that it uses the spectrum effectively, without causing harmful interferences.

The conformity is stated through the special marking "CE", which accompanies the device. Each device that bears the specific marking can be distributed freely in all EU countries. In what concerns the use of the device, depending on the marking, there are two cases, according to the following Table.

| Table II     |  |
|--------------|--|
| RTTE Marking |  |
| Marking      | Interpretation   |
| <b>CE</b>    | The device can be used freely  |
| <b>CE</b> ⚠  | Use restrictions are imposed, for which the manufacturer must inform the user. Such restrictions may be the restriction of use in some EU countries or the requirement of a licence. |

EETT is responsible to ensure that the equipment, which circulates in the market, is compliant to the above "essential requirements" and sees to the protection, adequate informing of consumers and the smooth operation of the relevant market. To this end, in 2003, it began sample controls of the RTTE that circulates in the market. Specifically, 100 products of several RTTE categories were examined and their level of compliance to the administrative requirements of Directive 1999/5/EC was recorded. At the same time, the design of a specific control system is at its completion phase, as well as the definition of the procedures that are required for the effective market surveillance.

In EETT's website one can find detailed information concerning the RTTE and the interpretation of the regulatory framework that governs its placing on the market<sup>13</sup>. Furthermore, detailed instructions are provided on the marking that the equipment must bear, as well as on its trading and use. The above information and instructions are addressed to providers as well as consumers.

At the same time, EETT is going to proceed to the issuance of information leaflets, which will address according to the case, consumers, specialised manufacturers and market representatives in order to inform them in a concrete and valid manner about the existing regime.

<sup>13</sup> www.eett.gr, Telecommunications/ Telecommunications Equipment Section



## 2.3. Postal Services

### 2.3.1. Universal Service – Courier Services

Postal services are divided into two categories: The Universal Postal Service and the Other Postal Services, which mainly include Courier Services.

The US is a set of basic postal services, which the State considers its obligation to ensure on a steady basis, at an affordable price and on a defined quality, to all citizens of the country, without exceptions and discriminations, irrespective of their geographic location in the country.

The US includes the handling of:

- ▶ Simple postal items of A and B Priority (letters, bills, magazines etc) Domestic and International, weighing up to 2 kilos.
- ▶ Parcels, Domestic and International, weighing up to 20 kilos.
- ▶ Registered letters, Domestic and International.
- ▶ Letters of a declared value in case of destruction, loss etc.

In Greece, ELTA has been designated as the sole Universal Service Provider (USP). ELTA is under the obligation to meet the quality standards and the delivery times as they are described in the relevant Ministerial Decision (MD)<sup>14</sup>. It is noted that the US market is going through a gradual and controlled liberalisation.

As Courier Services are considered the services of special urgent handling of postal items, which are monitored by the Postal Items Special -Track and Trace- System (PISTTS) operated by the undertakings. The Courier and other services market are fully liberalised.

Key aspects in Courier Services and an element that differentiates undertakings providing such services from the USP are the speed in handling a postal item and the existence of a PISTTS capable of monitoring the progress of a postal item through all handling stages, from sender to addressee.

The handling speed and the capability to monitor a postal item through all stages, the time within which an undertaking is able to locate an item, if needed, but –mainly- the method and the resources used for this purpose, are elements of decisive significance for that undertaking's level of organisation and for the quality that the undertaking provides in handling postal items. Moreover, all the above add value to the service offered as compared to the US.

Furthermore, Courier undertakings, depending on their capabilities and their organisation, provide services adaptable to consumer demands, such as:

- ▶ Collection from the sender's address.
- ▶ Delivery to a specific addressee or to a person authorised by the addressee.
- ▶ Delivery of item in the timeframe defined by the sender.
- ▶ Guarantee on the delivery time.
- ▶ Provision of information to the sender or the addressee on the item's location through all handling stages.
- ▶ Information on the item's handling for a long period after its delivery to the addressee.
- ▶ Possibility to alter the destination and the addressee during the handling of the item.
- ▶ Notifying the sender that the item was delivered to the addressee.
- ▶ Provision of delivery receipt to the sender.
- ▶ Delivery on the same day within the city, delivery on the next day before a predetermined time (i.e. before 09:00 or 12:00).

<sup>14</sup> MD 79293/2000, GG Issue 1588/B/29-12-2000.



The undertakings that provide Courier Services are licensed by EETT and are under the obligation to inscribe the relevant Registry Number (recognition sign) provided by EETT, on their documents.

### 2.3.2. Charter of Obligations to the Consumer

The COC describes in detail the obligations of undertakings towards consumers for the provided services. Each undertaking is under the obligation to uphold what is provided in the COC and is committed to its provisions following the COC publication. The consumers have the option to look for COCs in the undertakings premises or websites.

EETT determined the minimum elements that must be included in the COC and which are the following:

- General information on the undertaking (legal form, goal etc).
- Detailed description of postal services or other products and further facilitations that are provided by the undertakings, i.e. the delivery and collection times of the postal item, the areas serviced by the undertaking, the types and the weights of items it can handle.
- Services quality standards.
- Price list of services and products.
- Description of the resolution method for any disputes between undertakings and consumers.
- Method of establishment and operating procedure of internal Dispute Resolution Committee.
- Compensations and exclusive deadlines for the claiming of compensations.
- Procedure to submit complaints.
- Consumer service.
- Responsibility areas of the undertaking.
- Reference of undelivered postal items handling terms.

### 2.3.3. Voucher (Accompanying Courier Note – Individual Agreement)

The consumers, during the handling order of a postal item, sign the Individual Agreement and the Accompanying Courier Note (ACN). The individual Agreement and the Note are imprinted on a special document (voucher). EETT determined the minimum elements that must be included in the voucher, which are the following:

- The undertaking's obligations and specifically the handling terms signed by consumers (undertaking's responsibility areas, insurance coverage option, compensation issues).
- The undertaking's distinctive title.
- EETT's Registry Number (recognition sign) for the certification of the undertaking's legitimacy.
- The information of the postal item (i.e. number or code) based on which the handled postal item is tracked.

### 2.3.4. Postal Items Special -Track and Trace- System

EETT proceeded to the definition of operation specifications for a specialised information system, through which all handling stages of a postal item are monitored.

This is, as mentioned above, the PISTTS, which must satisfy the appropriate specifications so that:

- The undertakings can provide any information to the consumer, with regard to the handled postal item throughout all its handling stages.
- The interconnection of undertakings that are part of the Postal Network<sup>15</sup> of the licensed undertaking, is feasible.
- The ability to exchange information between the collaborating licensed undertakings and their Networks is provided.

<sup>15</sup> Postal Network: The total organisation and every means and persons used by the postal services provider under the status of a General Authorisation, including persons or legal entities not granted a General Authorisation, to which postal work is assigned, according to the provider's Authorisation.

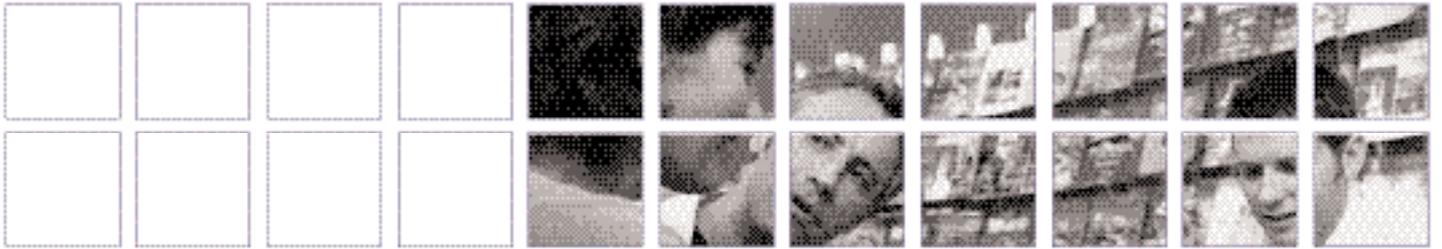
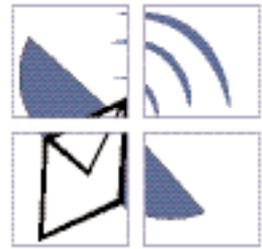


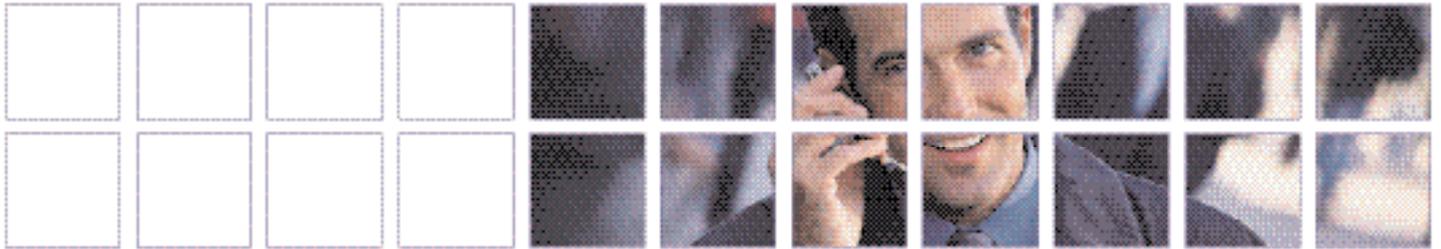
### 2.3.5. Benefits from Competition

The aforementioned EETT actions for the establishment and ensuring of healthy competition in the liberalised Courier market, contributed to a great extent to the maximisation of benefits for consumers.

Specifically, the main benefits for consumers can be summarised in the following:

- ▶ Establishment of a regulatory framework, which ensures the smooth operation of competition and more specifically a minimum level of Courier undertakings' organisation and a minimum quality level of provided services.
- ▶ Increase of consumer choices concerning the provided services by Courier undertakings.
- ▶ Ensure the provision of postal services and products, which cover an ever-growing part of the Greek state.
- ▶ Ensure the fulfillment of obligations by Courier undertakings towards the consumers, according to the COC, such as compensations.





**TELECOMMUNICATIONS SECTOR**



### 3. Telecommunications Sector

In this Chapter, we present EETT's main actions in the telecommunications market. These actions support two main strategic goals, which were included in EETT's Business Plan for 2003: the establishment of conditions for the development of modern networks and innovative services, as well as the promotion and safeguarding of competition between network and service providers. To achieve each individual strategic goal, EETT undertook specific actions, which mainly concerned the completion of the current regulatory framework, the control and monitoring of the telecommunications market, the promotion of electronic transactions, as well as actions for the further establishment of competition, such as the designation of Organisations with Significant Market Power (SMP) in relevant markets and the introduction of Number Portability.

#### 3.1. Development of Modern Networks and Innovative Services

##### 3.1.1. Completion of an Up to Date Regulatory Framework

###### Completion of the Current Numbering Framework

In 2003, the last phase of the National Numbering Plan (NNP) introduction was completed, having as a result the successful implementation of a three-year effort aiming at the gradual transition to the new numbering plan. EETT, as the competent authority,

promoted in 2001 and 2002, the introduction and implementation of the new ten-digit NNP and issued all the required Regulations related to the numbering spectrum management and to the Number Portability.

The numbering system in force in Greece till 2001, was unable to cover the increasing needs in numbers due to the entry of new providers and the provision of new services. Specifically, the last NNP introduction phase was implemented successfully in January 2003, with the change of the first digit 0 of mobile telephony subscriber numbers to 6.

At the same time, the current institutional framework was completed with the issuance of two Regulations<sup>16</sup>, which among other things regulate the management of:

- The NNP's short codes for the provision of directory enquiry services. This regulation establishes the use of five-digit codes in the form 118YX –where  $Y=\{1,\dots,9\}$ ,  $X=\{0,1,\dots,9\}$ - and supports competition development in the directory enquiry services market, as well as new innovative services.
- The NNP's routing numbers are used for call routing among networks or/ and nodes of the same network.

###### Reformation of Pricing Regulation

The increased consumers' need for adequate information and the need for safeguarding healthy competition in the telecommunications market were the main reasons for the regulatory framework reformation concerning the procedures definition for setting providers' tariffs. EETT, in May 2003, issued a Regulation<sup>17</sup> on the definition, control and publication of telecommunications providers' tariffs procedures. This Regulation replaced the one in

<sup>16</sup> EETT Decisions 276/39/2003 and 276/40/2003, GG Issue 604/B/15-05-2003.

<sup>17</sup> EETT Decision 277/64/2003, GG Issue 514/B/02-05-2003.



force<sup>18</sup> which was confined on the definition of a timeframe for tariffs' publication prior to their implementation.

Specifically, the new Regulation defined the approval procedure of retail and wholesale services under the obligation of cost-orientation (such as monthly voice telephony rental charge, local and national charge, Leased Lines tariffs, Interconnection services and Local Loop Unbundling (LLU) etc.), as well as the approval procedure of offers and discount packages, which concern services under the obligation of either cost-orientation or reasonable price. Furthermore, the new Regulation defined the approval procedure of wholesale prices for services included in the annual Reference Offers of the provider under obligation. At the same time, the new Regulation describes the procedure for data submission necessary for EETT's control of proposed tariffs, so that the planning and implementation of pricing policies by providers subject to cost-orientation, is facilitated.

As for the publication of tariffs, the new Regulation requires that all voice telephony providers publish detailed leaflets describing individual charges imposed per service. These leaflets will be distributed to the public from the providers' selling points. Alternatively, providers can provide tariff information through call centers. Furthermore, provided they have a website, providers will have to publish their tariffs there as well.

Specifically, this Regulation states that for the retail prices of the aforementioned services, providers are under the obligation to publish the proposed tariffs or any changes therein before their implementation, in two daily political

and one financial newspaper, all of pan-Hellenic circulation. Furthermore, providers subject to cost-orientation, are under the obligation to submit to EETT the clippings of newspapers relevant to the proposed tariffs, for clarity reasons.

As far as offers and discount policies on cost-oriented or reasonably priced services, the Regulation provides that prices must be transparent to avoid cases of cross subsidisation.

EETT expects that the new Regulation will enhance the further development of competition ensuring at the same time transparency and promotion of non discrimination among providers.

### **Licensing Status for Satellite Services Activation Points**

During 2003, EETT, after a collaboration with the Ministry of Transportation and Communications (MTC) and the Ministry of Mercantile Marine, issued a Regulation<sup>19</sup> on the authorisation of bodies as Points of Inmarsat Services Activation (PSA), clarifying their operation status. The PSA are bodies that enter in agreement with the satellite organisation Inmarsat and following an approval/ authorisation by the National Regulatory Authorities (NRAs), they receive and process applications by owners of Mobile Earth Stations (MES), for the use of a satellite segment of the Inmarsat satellite organisation.

The Inmarsat satellite organisation manages five geostationary satellites and operates as a mobile satellite telecommunications provider on a universal level.

<sup>18</sup> EETT Decision 208/1/2001, GG Issue 193/B/28-02-2001.

<sup>19</sup> EETT Decision 269/50/2004, GG Issue 1660/B/12-11-2003.



In Greece, according to the aforementioned Regulation, providers that wish to operate as a PSA for mobile earth stations are classified in the category of simple telecommunications services resellers and their sole obligation is to provide EETT a written statement regarding information on their activities. EETT maintains a Registry with information on providers authorised to operate as PSAs and publishes relevant information on its website<sup>20</sup>.

### Virtual Providers Operational Framework

During 2003, for the first time in the Greek market, providers expressed interest in providing telecommunications services through the model of the Virtual Network Operator (VNO). A virtual operator is the one that has not developed its own network and offers services based on the networks of other providers.

Until today, providers develop networks and provide services simultaneously, due to fixed and mobile voice telephony and Internet access driven demands. In the near future, given the rapid technological advancement, especially the implementation of Intelligent Networks (IN) which operate complementarily and in collaboration with Public Switched Telephone Network (PSTN), broadband networks and 3G Mobile Communications networks, new attractive services are expected to be developed to exploit the infrastructure and capabilities of the aforementioned networks. These services may also be developed by providers that do not have their own network and wish to specialise in the development of services, satisfying consumer needs.

In this view, in 2003, the first application for the operation of a virtual network operator was submitted

to EETT. EETT responded to the request, examined the Greek market needs and the relevant regulatory framework of other European countries. Then, EETT introduced a new category of Individual Licence due to the fact that virtual network operators provide telecommunications services to the public, using the networks of licensed telecommunications providers, after entering in an agreement with them and using Carrier Selection and Carrier Pre-selection codes assigned by EETT. The examination and completion of the aforementioned request constituted the introduction of the virtual network operator concept in the Greek telecommunications market.

To protect consumers and secure the continuous provision of services virtual network operators, besides the obligations applying on voice telephony providers, are also obliged to conclude into at least two agreements with licensed telecommunications providers. At least two months prior to their termination, these agreements, have to be renewed or replaced by others and then notified to EETT. EETT expects that virtual network operators will lead to an increase of consumer choices and further strengthen the competition in the market.

### Standing EETT Arbitration

The institution of Standing EETT Arbitration, was introduced by Presidential Decree (PD) 388/2002<sup>21</sup> and defines the type of disputes among telecommunications providers that can be brought under EETT's Standing Arbitration, sets the procedures that must be followed and finally, describes the basic principles for the drafting of the Arbitrators list by EETT. Until then, the aforementioned disputes were resolved either through

<sup>20</sup> [www.eett.gr](http://www.eett.gr), Telecommunications/ Licensing/ PSA for Inmarsat Section.

<sup>21</sup> PD 388/2002, GG Issue 335/A/31-12-2002.



complaints to EETT following the Hearings procedure, or through recourse to civil courts.

Within EETT's competences are mostly disputes that arise from:

- ▶ The provision of telecommunications activities, such as access, Interconnection, LLU.
- ▶ The non implementation of competition rules when exercising telecommunications activities.
- ▶ The installation of telecommunications networks, especially when accessing or/and coming through public or/ and common use areas or/and third party properties.
- ▶ The assignment of Domain Names with a [.gr] suffix, as well as the Electronic Signature.
- ▶ The obligation to provide Universal Service (US).
- ▶ The installation and operation of mobile telephony antenna mast constructions and terminal equipment.

The Standing Arbitration can be addressed by any person, legal entity or association with or without a legal status. In order for the disputes to be brought under EETT's arbitration, a written consent of the interested parties is required or classification of one party and acceptance by the other. EETT drafts a relevant list of Arbitrators which is renewed each year. The Arbitrators are selected according to their scientific training and their expertise in issues of telecommunications or competition legislation. The interested parties select the Arbitrators from EETT's relevant list. Based on the provisions of the aforementioned PD and EETT's competences, a Decision<sup>22</sup> was adopted, regulating all issues related to the drafting of the Arbitrators list and then EETT proceeded to the actions that led to the list's drafting. The aforementioned Decision describes the qualifications that must be satisfied by anyone who wishes to be included in the Arbitrators list and the procedure that

EETT should follow in order to draft and renew the list.

### 3.1.2. Monitoring and Control Procedures for the Smooth Operation of the Telecommunications Market

In 2003, EETT intensified its interventions for a more effective supervision of the telecommunications market and in particular:

- ▶ The control and assessment on abiding by the individual terms of agreements between the SMP operator and the other providers.
- ▶ The investigation of complaints sent to EETT by providers and consumers.
- ▶ The regular contacts with providers for issues related to the smooth operation of the telecommunications market.

These interventions mostly concerned issues of Licensing, Interconnection, Leased Lines and Bitstream Access, given their importance for the establishment of competition in the telecommunications market. Below, we present in more detail, some of EETT's relevant actions during 2003.

#### Licensing

In the context of monitoring providers with an Individual Licence, EETT proceeded to the implementation of control procedures for the conformity of these providers to the network coverage terms obligations mentioned in their Licences.

#### Interconnection

Ensuring Interconnection among telecommunications networks, is one of the most important conditions

<sup>22</sup> EETT Decision 281/54/2003, GG Issue 1029/B/24-07-2003.



for the smooth operation and the development of the telecommunications market, given the fact that it allows communication between all users of the same or different networks, as well as their access to all provided services by the aforementioned networks.

EETT's actions concerning Interconnection issues, aimed at the assessment of OTE's conformity to the provisions of the relevant regulatory framework, and especially the strict and full implementation of the Reference Interconnection Offer (RIO) provisions. The RIO constitutes the negotiating basis for the conclusion of an Interconnection agreement between providers and OTE. The main problem identified was the non provision of Interconnection services, in order for OTE subscribers to gain access to audiotext services, which were provided by other networks, as well as access by subscribers of other providers to audiotext services provided by OTE's network. A Hearing was carried out by EETT in order to resolve this issue and the relevant Decision is expected to be issued in the beginning of 2004.

### **Leased Lines – Part Circuits**

Leased Lines are used by telecommunications providers for the development of backbone network and the enablement of subscribers to access their network. Part Circuits are Leased Lines whose one terminal point is located in the end-user's premises and the other in the provider's premises, and their length does not exceed 5 kilometers. It is evident that Leased Lines and Part Circuits are extremely important for the development of competition.

Through its controlling interventions, EETT aimed at the control of Leased Lines and Part Circuits provision according to the current regulatory framework, especially related to OTE, the SMP operator in the relevant market.

### **ADSL Access (Bitstream Access)**

The interested telecommunications providers with ADSL Access can provide services to end users by utilising OTE's relevant installed xDSL infrastructure.

EETT, after OTE notified its intention to provide ADSL Access, proceeded to a series of actions, aiming at safeguarding competition in the relevant market and at promoting the rapid provision of broadband services to consumers. More specifically, EETT carried out a series of meetings with OTE and the telecommunications providers, in order to resolve issues that arose during the provision of ADSL Access. At the same time, trying to ensure the non discriminatory and transparent provision of this service, EETT proceeded to the clarification of relevant provisions in the Offer published by OTE.

Furthermore, EETT summoned OTE to a Hearing to ascertain any violations of the relevant telecommunications legislation, concerning the imposition by OTE of exclusive procurement and installation of terminal equipment for the provision of ADSL Access. The Decision on the aforementioned Hearing will be issued in the beginning of 2004.

During 2003, successive reductions of OTE's retail tariffs were announced related to the provision of ADSL Access and this is expected to have a great impact on the increase of broadband services penetration in our country. Due to this, EETT will continue to examine OTE's technical and commercial terms of provision for this specific service.

### **Price Control for OTE Cost-Oriented Services**

During 2003, EETT, with the assistance of independent auditors, performed the following two audits in OTE's cost accounting system:



### *1. Cost Control of Tariffs for Fully Unbundled and Shared Access to OTE's Local Loop.*

This refers to the audit of cost-oriented prices for Fully Unbundled and Shared Access to the Local Loop for all services included in OTE's relevant Offer. The audit<sup>23</sup> led to the detailed definition of prices for all services required for the provision of LLU, however no cost-oriented prices resulted for the monthly rental charge and the lump sum connection fee. EETT, until the cost-orientation of the aforementioned services is proven, defined prices for Fully Unbundled as well as Shared Access to the Local Loop services.

### *2. Annual Audit of OTE's Costing Accounting System*

The annual audit had as an objective:

- ▶ The control of OTE cost accounting systems compliance with EETT's approved methodologies, including the related improvement proposals EETT had submitted to OTE and resulted from the previous annual audits. These methodologies are based on the Fully Distributed Cost (FDC) model using as a cost basis the Historic Cost (FDC – HC), and on the model of the Long-Run Average Incremental Cost (LRAIC) using as a cost basis the Current Cost (LRAIC – CC).
- ▶ The general audit of cost-oriented tariffs for services under regulation in 2003, based on the 2001 actual data.

Specifically, the audit focused on OTE's tariffs on services of Voice Telephony, Leased Lines, Interconnection and LLU, and it was conducted during the period August – November 2003. (The audit results are indicated in the relevant Decisions<sup>24</sup> issued by EETT).

It is noted that for some services, OTE did not submit adequate data for the calculation of cost-oriented prices. For these services, estimating that any omissions by OTE should not lead to aggregating results for the relevant markets in Greece, EETT set prices using available information from OTE's cost accounting system audit and methodologies commonly accepted by international practices.

In the context of the annual control of its cost accounting system, OTE, in November 2003, submitted for approval to EETT a pricing policy proposal on voice telephony, with the following principal characteristics:

- ▶ Per second charge option.
- ▶ Discounts depending on the amount of the bill.
- ▶ Definition of different tariffs for rush hours or non rush hours, for retail services of voice telephony as well as for Interconnection services.

EETT issued a Decision<sup>25</sup> on OTE's proposed pricing policy, following the audit's completion, especially in what concerns OTE's compatibility with its cost-orientation obligations and competition principles. EETT also examined the possible existence of price/ margin squeeze.

### **Framework Definition for Telecommunications Emergency Conditions**

EETT, according to the provisions of Law 2867/2000, controls and ensures the protection of users' rights, among which the unimpeded and quality use of telecommunications services is included.

Due to this responsibility, EETT began the necessary actions for the formulation of action plans, concerning the management by providers of emergency conditions that

<sup>23</sup> EETT Decision 277/63/2003, GG Issue 331/B/20-03-2003.

<sup>24</sup> EETT Decisions 300/47/2003 and 299/46/2003, GG Issue 1925/B/24-12-2003.

<sup>25</sup> EETT Decision 301/30/2003, GG Issue 1925/B/24-12-2003.



may appear in telecommunication networks. In the context of these actions, as emergency conditions are considered those during which, due to external or internal factors (i.e. national or religious holidays, international cultural or athletic events, political crises, natural or industrial disasters), a telecommunications network can not respond to the communications needs of users and offer the agreed usual service quality.

EETT's goal is to define specific national action plans in order to face emergency conditions, which will aim at defining specific procedures and steps, and will describe the role of each provider in detail.

The participation and the wide acceptance of project outcomes by telecommunications providers, is important for its success, as these providers will be called to implement the action plans. To this end, in September 2003, EETT carried out a Public Consultation on the definition of the project's technical content, which will lead to the formulation of those plans.

Telecommunications providers, equipment providers and consulting companies participated in the Consultation. The participants' comments were indexed and the results were published in EETT's website. Furthermore, the Consultation's conclusions were taken into consideration during the finalisation of Tender Documents for the aforementioned project, which will begin in January 2004.

### 3.1.3. Internet – Electronic Transactions

#### Domain Names with a [.gr] suffix

Among EETT's competencies is the assignment and management of Domain Names with a [.gr] suffix. In 2002, EETT issued a Regulation<sup>26</sup>, which defines the framework

concerning the regulation of domain name issues. Specifically, it defines, among other things, the Domain Name assignment procedures and provides for: a) the operation of a three-tier scheme "Registrar-Registrant-Registry" and the definition of obligations that govern the operation of Registrars and the Registry and b) the selection of Registry, after a tender procedure, which undertakes the technical tasks of activation and management of Domain Names with a [.gr] suffix for EETT.

More specifically, the Registry undertakes the organisation, management and operation of Domains with a [.gr] suffix. The Registry's competences include, among other things, the maintenance of databases with the registration data, the provision of search facilities and the registration of Names. The Registrars are Internet Service Providers (ISPs), or other bodies who undertake the management of applications for the assignment of Domain Names and at the same time provide relevant services to interested parties.

Implementing this Regulation, EETT proceeded to an invitation to tender in May 2003, for the selection of the aforementioned body. In July 2003, the Institute of Computer Science of the Foundation for Research and Technology Hellas (ICS-FORTH) was declared the Contractor. The latter, in close collaboration with EETT and under its guidance, has begun the implementation of the [.gr] Registry and the project is expected to be completed in the beginning of 2004.

The Registry that will result from the project's completion will technically manage the Domain Name System (DNS) with a [.gr] suffix, providing high quality services, such as reduced system response time and high system availability. Furthermore, the Registry's

<sup>26</sup> EETT Decision 268/73/2002, GG Issue 1617/B/31-12-2002.



operation will signal the commencement of operation for Registrars. The operation of Registrars will be based on the existence of an approved by EETT list of providers that will meet specific conditions and thus will be able to provide reliable services to the end user, in what concerns Domain Names.

With the commencement of operation of the three-tier scheme, EETT expects that the majority of issues that have arisen from the intense Internet development will be resolved, thus safeguarding the rights of Internet users in Greece.

### Electronic Signature

EETT, aiming to promote electronic transactions and at the same time, protect consumers, issued in 2003 three Regulations,<sup>27</sup> introducing the implementation rules of Voluntary Accreditation of Electronic Signature Certification Service Providers (CSP). Since 2002, EETT had already defined through a Decision<sup>28</sup> the procedures for monitoring and control established CSPs in Greece which issue certificates or provide other services related to Electronic Signature.

Specifically, the first among the Regulations, issued in 2003, defines the procedures of Bodies designation – private or public – in order to:

- ▶ Ascertain the compliance of Secure Signature Creation Devices<sup>29</sup> for Electronic Signature and secure cryptographic units to PD 150/2001<sup>30</sup>.
- ▶ Ascertain the compliance of CSPs to the Voluntary Accreditation criteria.

The Regulation defines the beneficiary Designated Bodies, who may also be based abroad, their appointment criteria, as well as their obligations. Furthermore, it describes the revocation and suspension procedures of services of the Designated Body aiming to protect CSPs and consumers.

The second Regulation defines the compliance criteria and control procedure of secure signature creation devices for Electronic Signature and the secure cryptographic units to PD 150/2001. Furthermore, it defines the procedures of issuance, revocation and publicity of Compliance Certificates.

The third Regulation concerns the criteria for the Voluntary Accreditation of CSPs that issue Qualified Certificates, have previously been designated according to the relevant Regulations and provide at least the basic certification services. These services in the framework of Voluntary Accreditation include the registration of subscribers, the issuance of certificates, the directory services and the accreditation revocation services. Furthermore, the Regulation defines the Voluntary Accreditation procedure, as well as the rights and obligations of those requesting Voluntary Accreditation as well as of the Accredited CSPs.

Having defined the principal regulatory axes, EETT will further support in 2004, the promotion and spread of Electronic Signature. In this manner, EETT will contribute to the promotion of electronic transactions and communication through the Internet

<sup>27</sup> EETT Decisions 295/63/2003, 295/64/2003 and 295/65/2003, GG Issue 1730/B/24-11-2003.

<sup>28</sup> EETT Decision 248/71/2002, GG Issue 603/B/16-05-2002.

<sup>29</sup> Secure signature creation device: Hardware (i.e. smartcards, tokens) or software, which is under the exclusive possession of the person signing electronically and which ensures the uniqueness and secrecy of the Electronic Signature. Providing that the specific requirements as determined by the European and Greek legislation in force are fulfilled, then the signatures generated by such a device are legally equivalent to handwritten ones.

<sup>30</sup> GG Issue 125/A/25-06-2001.



in the public (e-Government) and in the private sectors, as well as in the sensitisation of the public in matters of Electronic Signature use.

## 3.2. Promotion of Competition in Networks and Services

### 3.2.1. Interventions based on the Framework in Force

#### Organisations with Significant Market Power in the Mobile Telephony Market

In 2002, EETT issued a Decision designating providers COSMOTE S.A. and VODAFONE as Organisations with SMP in the public networks and mobile telephony services market. In the beginning of 2003, EETT issued a Decision<sup>31</sup> designating the providers COSMOTE S.A., STET HELLAS S.A. and VODAFONE as SMP Operators in this market.

It is noted that the goal of the relevant legislative framework is to develop the principles of Open Network Provision (ONP), which render feasible the access of subscribers from one telecommunications provider to the other. This is also a necessary precondition for the entry of new providers to the wider telecommunications market.

Specifically, in this context, Organisations with SMP must satisfy all reasonable requests for network access, including access to points other than the terminating network points that are mentioned to the majority of end users. Furthermore, they have to abide by the principles of non discrimination and transparency as to the Interconnection offered to

third parties and to treat all providers requesting Interconnection or Special Access, in an equal manner. Non discrimination requires that providers' requests are satisfied in equivalent conditions, in equivalent circumstances and for equivalent services.

Implementing the same principle, the SMP Operators in the market of public networks and mobile telephony services, are under the obligation to provide information and services concerning Interconnection and Special Access to third parties, under the same conditions and of the same quality as their own provided services or the services of their subsidiaries or partners. Finally, it is noted that these Organisations are under the obligation to provide, following a request, all the necessary information and specifications to providers that are examining the prospect of Interconnection, in order to facilitate the conclusion of the agreement.

#### Organisations with Significant Market Power in the Interconnection Market

EETT, by Decision<sup>32</sup>, designated the telecommunications providers COSMOTE S.A., OTE and VODAFONE as Organisations with SMP in the Interconnection Market of public telecommunications networks. The aforementioned Organisations have to fulfill all the relevant obligations provided by the national and European legislation in force.

More specifically, their obligations, as they result from the Directive 1997/33/EC and PD 165/1999<sup>33</sup>, are among others, the following:

- ▶ To satisfy all reasonable requests for access to the public telecommunications network, including

<sup>31</sup> EETT Decision 278/65/2003, GG Issue 338/B/20-03-2003.

<sup>32</sup> EETT Decision 275/72B/2003, GG Issue 148/B/12-02-2003.

<sup>33</sup> PD 165/1999, GG Issue 159/A/04-08-1999.



access to points other than the public network terminating points that are provided to end users.

- To implement the principle of non discrimination in Interconnection offered to third parties.
- To implement equivalent conditions in equivalent circumstances for interconnected providers providing equivalent services.
- To implement Interconnection fees that follow the principles of transparency and cost orientation.

It is noted that EETT can request from these Organisations to fully justify the Interconnection fees they charge and demand the reformation of fees, when this is deemed necessary.

The aforementioned actions led to a significant decrease of call termination fees from a fixed to any mobile telephony network, as it can be seen at Charts 50, 51, 52, and 53.



Chart 50

Call Termination Fee to a VODAFONE Subscriber

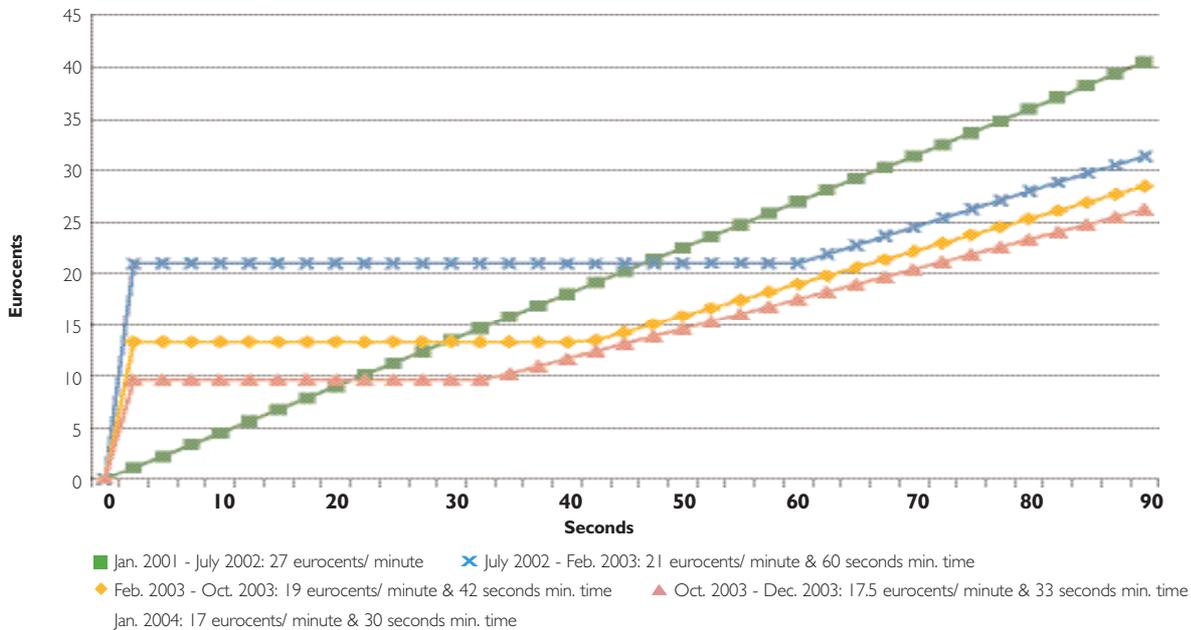


Chart 51

Call Termination Fee to a COSMOTE S.A. Subscriber

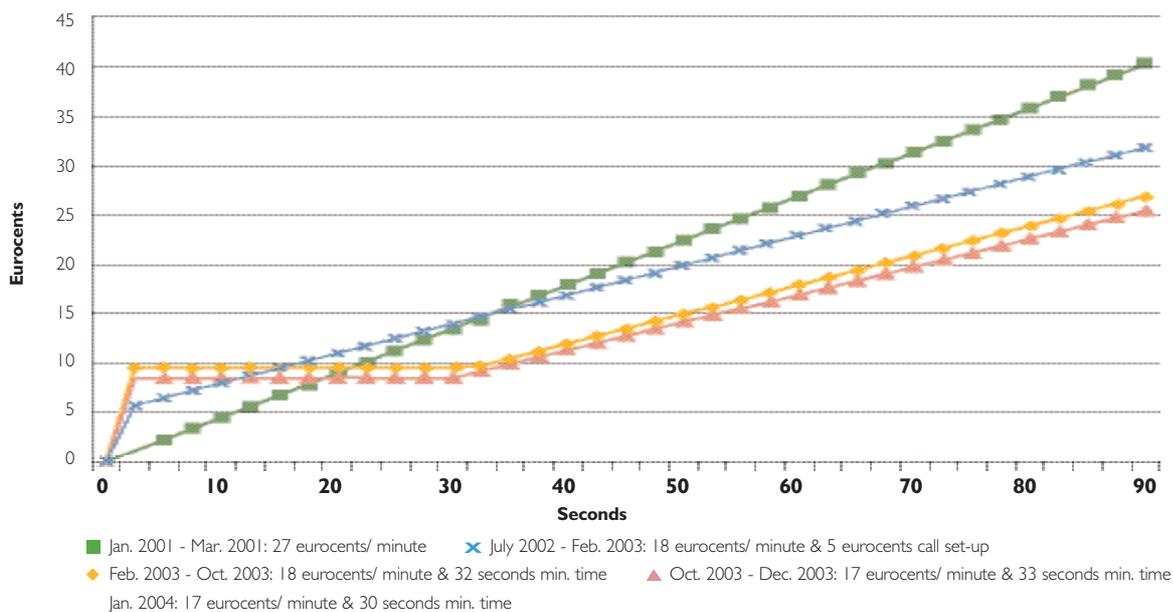




Chart 52

Call Termination Fee to a STET HELLAS S.A. Subscriber

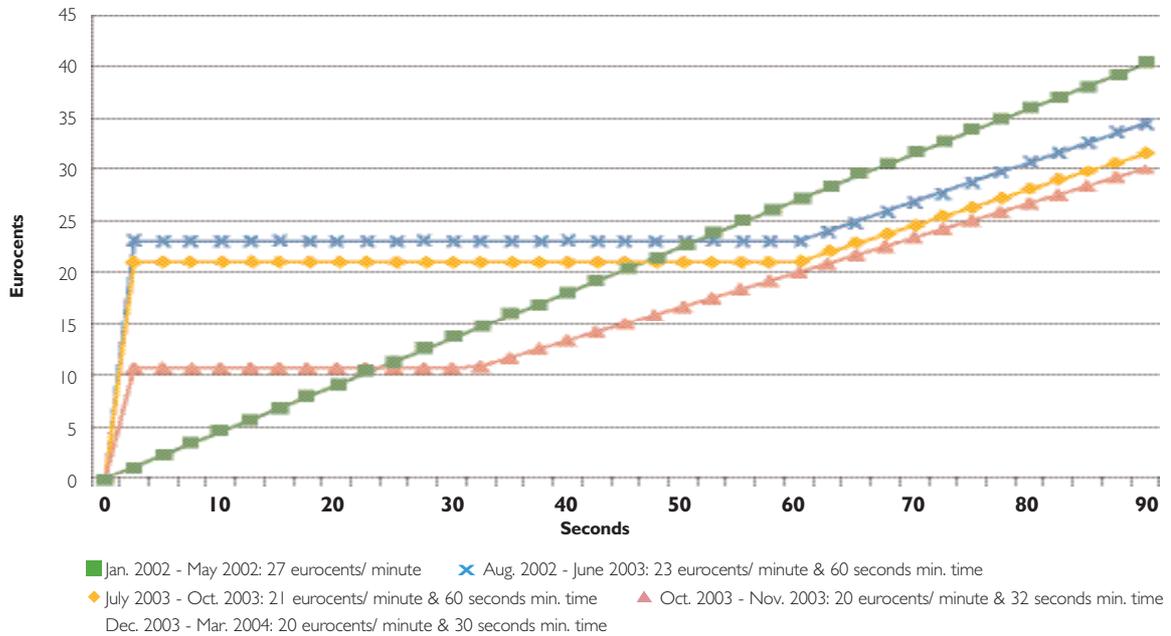
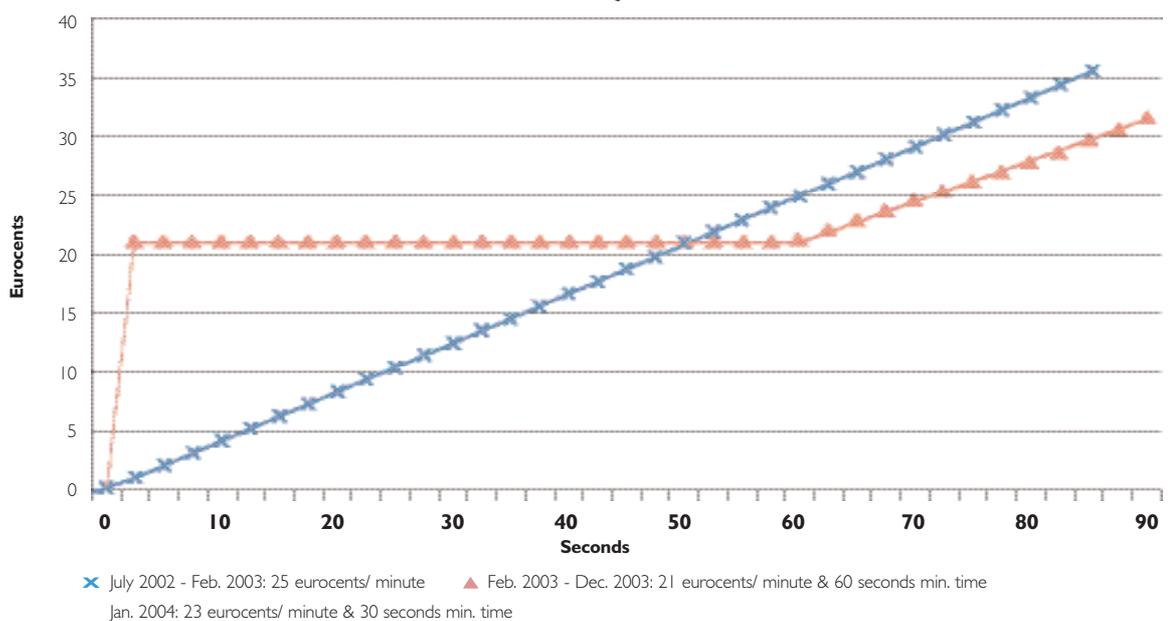


Chart 53

Call Termination Fee to a Q-TELECOM Subscriber





### OTE's 2003 Reference Interconnection Offer

Interconnection of telecommunications providers' networks constitutes one of the most important conditions for the smooth operation and development of the telecommunications market. According to the legislative framework, the SMP Operators in the relevant market are obligated to publish a Reference Interconnection Offer (RIO), which constitutes the negotiating base for the conclusion of relevant Interconnection agreements. Among EETT's competences is the control and approval of the RIO, with the aim to protect the market from any possible distortions, to uphold the non discrimination principle on the part of the Organisations in question and to create favourable competition conditions.

In December 2002, OTE, the SMP operator in the relevant market in Greece, submitted for approval the 2003 RIO. EETT, after a control, proceeded to amendments, which mostly concerned the provided Interconnection services, the price control, as well as the conditions and the procedures of service provision. The points where the RIO was upgraded resulted either from the needs that were ascertained during the implementation of the previous RIO, or from the opinions/ proposals that were stated in the relevant Public Consultation carried out in November 2002. It is noted that 2002 was essentially the first year during which, the Interconnection of new fixed voice telephony providers' networks with OTE's network, was implemented and thus many Interconnection implementation issues arose, which, in their majority, were, resolved by the 2003 RIO.

The main differentiation points between the 2003 RIO and the previous RIOs were the following:

- ▶ Definition of a common Interconnection framework for fixed and mobile providers. In the 2003 RIO, the

proper additions/ amendments were made so that it can constitute the principal framework for the conclusion of an agreement between mobile providers and OTE. The common framework resulted in the establishment of competition in the relevant market, safeguarding it from any possible distortions.

- ▶ Integration in the RIO, for the first time, of procedures for the implementation of Number Portability and at the same time, simplification and clarification of procedures for Carrier Pre-selection.
- ▶ Clarification and definition of basic procedures and timetables for the implementation of Interconnection, such as testing procedures, failure announcement and restoration, co-installation procedures, definition of algorithm for cost allocation of Interconnection links.

EETT, given OTE's obligation for cost-oriented pricing of most Interconnection services, and due to its inability to prove this cost-orientation for certain services, proceeded to the readjustment of some tariffs. The result was the increase of profit margins for new providers, with positive results for consumers. In Table 12 (page 80), we compare the margins between the Interconnection cost of new providers and the OTE's retail charges for the 2002 and 2003 RIOs. With the regulations of the 2003 RIO, the margins of new providers significantly increased. Specifically, they are given opportunities to make new investments and at the same time to provide the consumers with services of higher quality in lower prices.



**Table 12**

**Comparison of New Providers Margins in relation to the OTE Retail Charges**

| Call Type | Interconnection Type | Margins   |          |
|-----------|----------------------|-----------|----------|
|           |                      | 2002 RIO  | 2003 RIO |
| Local     | Local/ Local         | 16% ~ 20% | ~34%     |
|           | Local/ Simple        | -3% ~ 1%  | ~ 15%    |
| National  | Local/ Local         | 65% ~ 67% | ~ 73%    |
|           | Local/ Simple        | 57% ~ 59% | ~ 65%    |
|           | Simple/ Simple       | 49% ~ 51% | ~ 57%    |
|           | Simple/ Double       | 27% ~ 28% | ~ 34%    |

The most important Interconnection issues on which EETT will focus in 2004, are the clarification of Interconnection procedures and the definition of service prices included in the RIO.

**Bottom-Up Model Design for the OTE Network**

Bottom-up models are technical-economic studies through which the network cost of a telecommunications provider is defined for some services. A basic characteristic of these models is that an optimum planning of telecommunications networks is achieved, aiming at the maximum efficiency of their capabilities.

Such models constitute necessary tools for providers, because they will be able to know the provided service cost, but are also necessary for the National Regulatory Authorities (NRAs) in order to perform cost controls to providers. Most NRAs implement bottom-up models in services that must be cost-oriented by Organisations with SMP, so as to determine the relevant tariffs.

In September 2003, an EETT study by an external consultant was completed regarding the implementation of a bottom-up model for OTE's network and particularly

for the Interconnection, LLU and Leased Lines services.

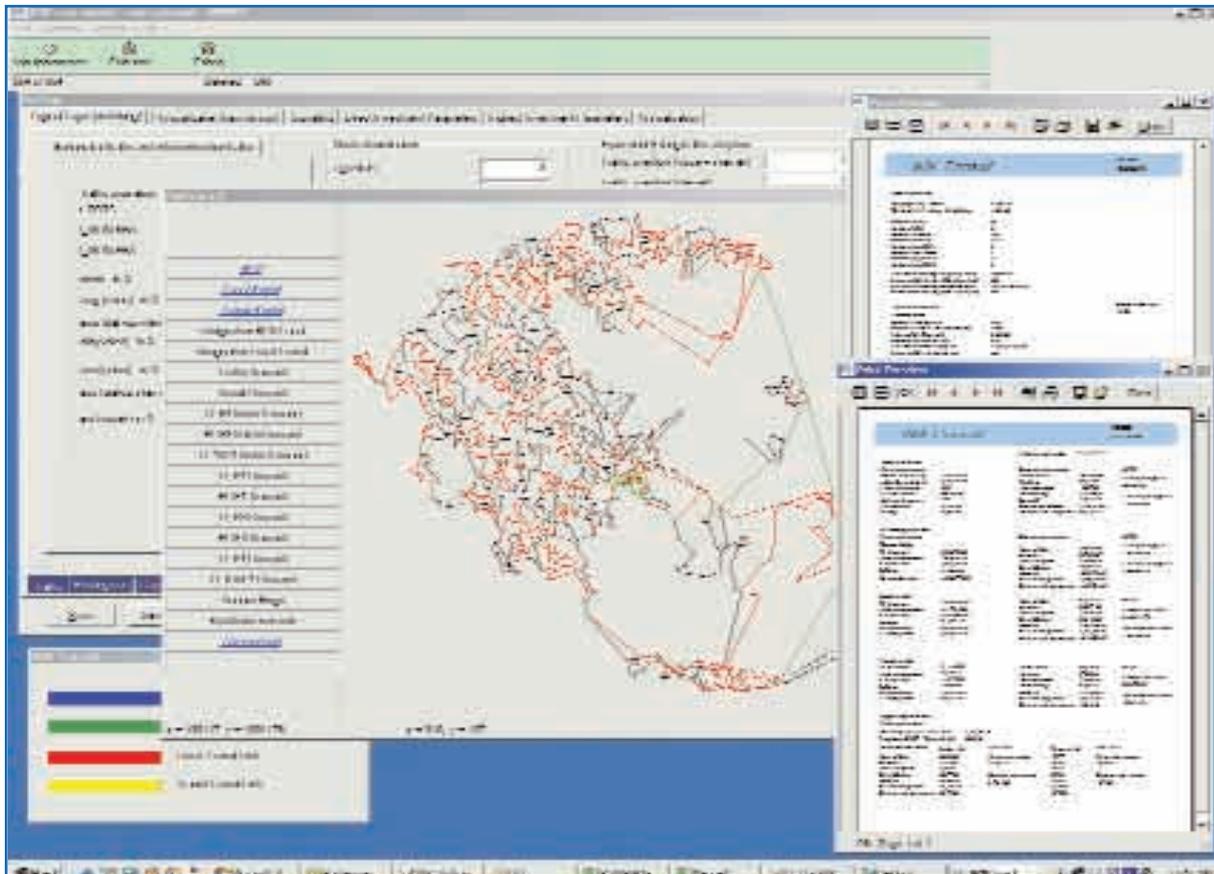
The execution of the project required the collection of a plethora of data from the Greek environment, thus data was requested from:

- ▶ OTE, when it concerned the network's technical characteristics, as well as its financial data.
- ▶ The National Statistical Service (NSS) of Greece for demographic data such as the country's population and the number of households.
- ▶ The Ministry of Environment, Physical Planning and Public Works (MEPPPW), concerning the geographic limits of prefectures and municipalities for the whole Greek state.
- ▶ A private undertaking, for data on the coordinates of roads for the whole Greek state (Geographical Information System-GIS).

Following the above, the design and implementation of the model was executed, giving emphasis to the characteristics of the Greek state, as for example the particularities of the population distribution (densely populated urban centers in opposition to scantily populated rural areas) and the particular geographical characteristics (many islands). The model calculates the network costs for the following services:



**Figure I: Operational Environment of the Bottom-Up Model**



- Interconnection.
  - Local, Single and Double Call Collection.
  - Local, Single and Double Call Termination.
  - Single and Double Call Transit.
  - Provision of Flat Rate Internet Access Call Origination (FRIACO).
  - LLU.
  - Fully Unbundled Access.
  - Shared Access.
- Leased Lines.
  - Typical Leased Lines.
  - Part Circuits.

An important characteristic of the model is its high level of capability. It is indicatively mentioned that it receives approximately 700 input parameters, which are initiated

by the model's user and used for the calculation of the cost of the services under examination. The aforementioned model is flexible and can be readjusted in case the initial data changes. (Figure I presents the model's operational environment).

Thus, EETT has in its possession a useful and effective tool, which allows EETT to:

- Assess and evaluate the proposed, through top-down approaches, tariffs by OTE for Interconnection, LLU and Leased Lines.
- Assess the cost for the introduction of new services by OTE.
- Compare the top-down and bottom-up methodologies for the provision of services, a comparison that leads to the identification of non-efficient processes for the



provision of specific services, as well as to a general assessment on the efficiency of services provided by OTE.

The bottom-up model has already been used by EETT for the examination of OTE's proposed tariffs for Interconnection, LLU and Leased Lines and is expected to be used for the assessment of other existing and new services tariffs.

### **Bottom-Up Model Design for the Mobile Telephony Networks**

In 2003, given the high mobile call termination tariffs, EETT collaborated with a consultant for the analysis of the competition level in the relevant market. Specifically, a bottom-up model was designed, concerning the networks of mobile telephony providers in order to use this model for the shaping of a proper regulatory policy.

EETT also carried out a Consultation with the mobile operators, during which the basic principles of the bottom-up model were presented. Following that, the model was notified to the providers to study it in detail. The providers sent their comments on the model, which in their majority were taken into consideration in the new improved versions of the model. The model calculates the mobile call termination cost and serves the following goals:

- The definition of the competition level in what concerns the tariffs for call termination.
- The definition of the target price, in case EETT deems it necessary to impose cost-oriented termination tariffs.

The model calculates the network cost for a number of

services, including the outgoing traffic to other networks, the traffic within the network and the incoming traffic from other networks. The model uses the Long Run Incremental Cost (LRIC) method.

EETT, having in its possession the specific bottom-up model, ensures that its regulatory policy on mobile call termination tariffs, is objective and thus the interests of mobile and fixed voice telephony users are more effectively safeguarded.

### **3.2.2. Interventions based on the New Framework**

#### **Market Analysis and Assessment of Significant Market Power in Relevant Markets**

In March 2002, the European Union (EU) adopted the new Regulatory Framework for electronic communications networks and services, which among others, includes the following Directives:

- Directive 2002/21/EC<sup>34</sup> of the European Parliament and of the Council of March 7<sup>th</sup>, 2002 (Framework Directive), on a common Regulatory Framework for electronic communications networks and services.
- Directive 2002/19/EC<sup>35</sup> of the European Parliament and of the Council of March 7<sup>th</sup>, 2002 (Access Directive) on access to, and interconnection of, electronic communications networks and associated facilities.
- Directive 2002/22/EC<sup>36</sup> of the European Parliament and of the Council of March 7<sup>th</sup>, 2002 (US Directive) on US and users' rights relating to electronic communications networks and services.
- Directive 2002/20/EC<sup>37</sup> of the European Parliament

<sup>34</sup> Directive 2002/21/EC, OJ L108 of the 24-04-2002, p. 0033-0050.

<sup>35</sup> Directive 2002/19/EC, OJ L108 of the 24-04-2002, p. 0007-0020.

<sup>36</sup> Directive 2002/22/EC, OJ L108 of the 24-04-2002, p. 0051-0077.

<sup>37</sup> Directive 2002/20/EC, OJ L108 of the 24-04-2002, p. 0021-0032.



and of the Council of March 7<sup>th</sup>, 2002 (Authorisation Directive) on the authorisation of electronic communications networks and services.

The aforementioned Framework was put into effect on the 24<sup>th</sup> of April 2002 and the member-states should integrate it in national law until the 25<sup>th</sup> of July 2003.

According to the new Regulatory Framework, the definition of markets must be conducted according to the principles of competition law and taking into consideration the Recommendation of the Commission on relevant markets, as well as the Commission guidelines on market analysis and assessment of SMP. The Framework Directive, provides that the NRAs analyse the level of competition in the relevant markets mentioned in the Commission's Recommendation<sup>38</sup> of the 11<sup>th</sup> February 2003 on the markets of electronic communications products and services that need regulation a priori, as well as in any additional markets they may define.

The procedure that must be followed by the NRAs is divided in three stages:

- ▶ Market definition.
- ▶ Assessment of the level of competition and designation of SMP Operators in the relevant market.
- ▶ Proposed regulatory obligations.

In the aforementioned Recommendation, eighteen markets are proposed for examination.

Before the final decision concerning the definition of these markets and the imposition of proposed regulatory obligations, the NRAs are obligated to carry out relevant Public Consultations, on a national level as well as with the Commission and the NRAs of the remaining member-states.

In 2003, EETT, in order to respond to the aforementioned obligations, following an invitation to tender, assigned to a consultant a study on the definition and analysis of the mobile call termination market. It was ascertained that each mobile telephony network constitutes a separate market, which is not adequately competitive and that each mobile operator was designated as having SMP in the market of call termination in its network. The study's findings were put to a Public Consultation in September 2003. EETT, upon completion of the Public Consultation, proceeded to draft a text of positions concerning the regulatory obligations that must be imposed, which will be put on Consultation in the beginning of 2004. Then, after it is finalised, it will be notified to the European Commission, according to the provisions of the new Regulatory Framework.

At the same time, in 2003, EETT began in collaboration with an external consultant, the works for the definition and analysis of the market of publicly available local or/ and national telephone services provided at a fixed position for non residential customers.

As far as the remaining markets, EETT sent to telecommunications providers relevant questionnaires for the collection of the necessary data and at the same time conducted a public tender procedure on the selection of a consultant for the project of analysis of the remaining markets.

### 3.2.3. Number Portability

Number Portability constitutes one of the principal pivots for the promotion of competition in the telecommunications sector, between the telecommunications providers. Number Portability allows consumers to retain their telephone number when they choose to change their

<sup>38</sup> Recommendation (2003) 497/11-02-2003.



telecommunications provider, so that they can satisfy their needs on quality and price. This invigorates the competition among telecommunications providers, who in an effort to attract new subscribers and to maintain the current ones, constantly improve the quality and price of services, to the benefit of the consumer.

Since 2002, EETT, by a Decision<sup>39</sup>, set detailed rules on the introduction of Number Portability in the telecommunications market. Number Portability concerns geographic numbers (fixed voice telephony numbers), non-geographic numbers (free of charge numbers and numbers of additional charge etc.), as well as mobile telephony numbers.

For the facilitation of Number Portability provision, the implementation of the National Relational Database for Number Portability (NRD-NP) began in 2003. It is a specially formed database, which operates under EETT's supervision and contains call routing information. The NRD-NP is linked to the operational databases of all providers, using a standardised communication infrastructure and supports the exchange of information between the databases (see Figure 2). This information mostly concerns the management of subscribers' portability applications, as well as the forwarding of providers

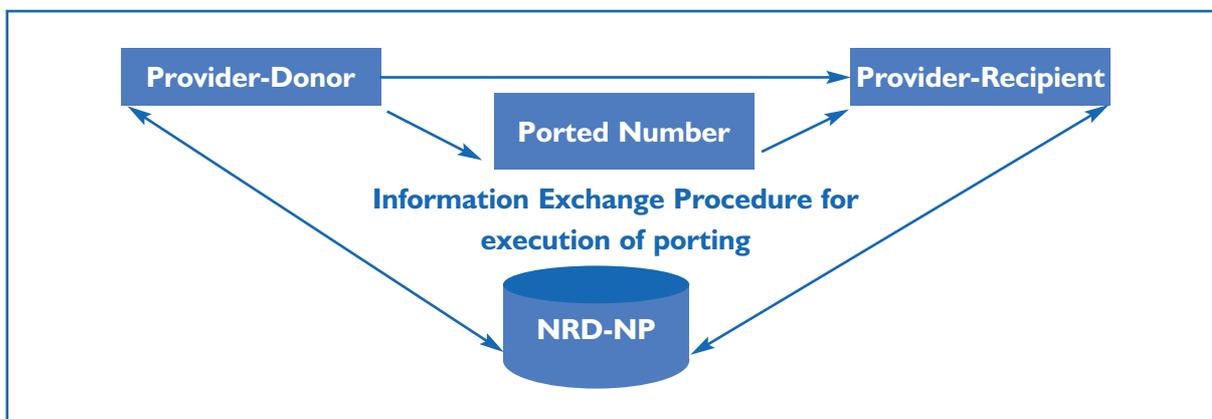
"identities" that accept the numbers (providers-recipients) to all providers, so that they can successfully route the calls to them and not to the former providers from which the numbers were transported (providers-donors).

For the implementation of NRD-NP, EETT collaborated with all involved providers, in order to collect the relevant technical requirements for NRD-NP design, as well as to resolve any issues that may affect the smooth and timely implementation of portability in our country.

The implementation of mobile telephony Number Portability with the use of the NRD-NP will take place gradually during 2004, in order to ensure the quality of provided portability services to the consumers. Specifically, EETT's Decision<sup>40</sup> finalised the following implementation schedule:

- ▶ During the period from January 12<sup>th</sup> – till February 27<sup>th</sup>, 2004, a limited range pilot operation with friendly users will be executed.
- ▶ The commercial provision of the service will begin on the March 1<sup>st</sup> 2004, and by March 31<sup>st</sup> 2004, the processing time of applications through NRD-NP will not exceed 20 working days. From April 1<sup>st</sup> 2004, the processing time of applications will not exceed 10 working days.

Figure 2: The Number Porting Procedure using NRD-NP



<sup>39</sup> EETT Decision 254/71/2002, GG Issue 791/B/26-06-2002.

<sup>40</sup> EETT Decision 300/22/2003, GG Issue 1915/B/23-12-2003.



### 3.2.4. Market Monitoring and Assessment of Competition Level

The need to evaluate the competition level in the telecommunications market renders the existence of an efficient monitoring system necessary, for the collection and processing of the necessary market related data and information.

Since 2000, EETT had already begun the collection of relevant data, mostly through telecommunications providers. At the same time, EETT collects and evaluates data from market surveys on a national and international level. This way, EETT monitors the development of competition on an EU level. Furthermore, with the use of suitable information and indexes on the national market, deviations and similarities between European markets can be analysed.

In 2003, EETT sent to all owners of General Authorisation or Individual Licence detailed questionnaires, aiming to draw and evaluate data, in order to imprint the all-time evolution of the market. This way, EETT has in its possession the majority of data required for the defining and analysing the relevant telecommunications markets.

At the same time, EETT, during 2003, provided information on the Greek telecommunications market to all interested bodies – the Ministry of Transportation and Communications (MTC), Eurostat, the Organisation for Economic Cooperation and Development (OECD) and the International Telecommunication Union (ITU) – undertakings, providers and citizens. Furthermore, by forwarding all the requested data on the Greek

telecommunications market to the European Commission, it contributed to the drafting of EU's 9<sup>th</sup> Report on telecommunications. The aforementioned Report, which is available in EU's website<sup>41</sup>, includes comparative analysis regarding the telecommunications market among member-states.

EETT also started the definition of market monitoring system specifications, which is expected to be completed in 2004. The development of an efficient monitoring system is expected to support EETT's work on market regulation. At the same time, a monitoring tool for the telecommunications providers' tariffs is being developed, aiming to implement an internet application, which consumers will be able to access through EETT's website in order to compare tariffs. This application is expected to be available to consumers during the first semester of 2004.

### 3.3. Safeguarding Competition

During 2003, critical issues arose, concerning competition in the telecommunications market, rendering EETT's intervention necessary, in order to ensure the smooth operation of the market. The principal issues that EETT was called to face are stated below.

#### Hearing concerning OTE Discount Packages on Voice Telephony

In March 2003, OTE notified EETT of its intention to implement discounts in voice telephony tariffs. According to OTE's proposal, national calls made on Sundays would be charged according to the tariffs of

<sup>41</sup> [http://europa.eu.int/information\\_society/topics/text\\_en.htm](http://europa.eu.int/information_society/topics/text_en.htm).



local calls, that are at 0.026 euros per minute. Furthermore, all consumers making international calls, would be able to select from one to three countries, which they call more often, and based on when they make international conversations (working day, weekends, morning or night), they would have the possibility of reduced prices. In the case of international calls, the precondition for someone to receive reduced prices was to have a total monthly bill (including local and national calls) exceeding 20 euros. Consumer reductions would increase in relation to the increase of consumer's total monthly bill.

OTE did not provide adequate data in order to ground the legality of the proposed modifications of its pricing policy, despite the fact that OTE was under the relevant obligation based on an EETT's Decision.<sup>42</sup> The latter, taking the above into consideration, decided<sup>43</sup> to adopt Interim Measures aiming to temporarily cease the provision of the specific discount packages until the issuance of the final Decision for the compliance of these offers with telecommunications and competition law.

OTE, after an application to the Athens Administrative Court of Appeal, requested the execution respite of the aforementioned Decision. The Court of Appeal rejected the relevant application and thus OTE was obliged to fully comply with the Decision.

Following that, EETT issued a Decision,<sup>44</sup> stating that with these specific discount offers, OTE violated the telecommunications legislation and the provisions on competition, and fined him with 100,000 euros. According to the Decision's grounds:

- Concerning the reductions in international calls,

following an examination of the data, it was ascertained that there was an infringement of competition operation in fixed voice telephony, due to the correlation of the discount in international calls with the traffic in local and national calls. International calls' discounts supposedly constituted a motive for OTE subscribers (residential and corporate) to continue their national and local calls through the latter. Thus, the effort of other providers to be competitive in the specific market was significantly constrained.

- Concerning the tariffs of national calls on Sundays, OTE's discount package was found to be violating the provisions on competition, as well as the legislation in force on telecommunications and especially the obligations for cost-orientation that are imposed to Organisations with SMP in the voice telephony market.

Furthermore, based on the grounds of EETT's Decision, the reduction of tariffs through offers, when the latter are not compliant to competition terms, works to the benefit of the consumer only in appearance and for a limited period of time. In reality, most of the times it works for the containment and dependence of the consumer from the dominant undertaking and thus leads to the distortion of competition. In this specific case, the problem was worsened because despite the fact that at the present stage Leased Lines were the only practically applicable solution for the rapid development of infrastructures, OTE had not defined cost-oriented wholesale tariffs. Concerning the access to the Local Loop, which constituted a necessary condition for new providers, in order to approach the total of consumers, great implementation delays were presented.

<sup>42</sup> EETT Decision 208/1/2001, GG Issue 193/B/28-02-2001.

<sup>43</sup> EETT Decision 283/73/2003.

<sup>44</sup> EETT Decision 290/132/2003.



### **OTE Hearing concerning the Provision of Local Loop Unbundling (LLU)**

EETT, in the context of its responsibilities according to Regulation<sup>45</sup> on LLU, monitored closely the evolution of LLU provision by the Organisation under obligation, meaning OTE. In the framework of telecommunications legislation, OTE is obliged to examine and satisfy reasonable beneficiaries' requests for LLU, within the provided schedules by the Reference Offer of Fully and Shared Access to the Local Loop, in a manner that is compliant with the obligations for transparency, non discrimination and cost-oriented pricing.

From the total data notified to EETT, significant violations by OTE were considered possible concerning its obligations for the provision of LLU, which were confirmed after the execution of a Hearing held by EETT in September 2002. According to EETT's relevant Decision<sup>46</sup>, OTE either did not satisfy the majority of submitted requests or acted with a great time deviation from the schedules imposed in a regulative manner by the Reference Offer for LLU in force, or even proceeded to a discriminatory treatment of some providers. Furthermore, it was ascertained that OTE did not comply with its obligations for cost-oriented pricing, despite the continuous recommendations by EETT.

EETT, taking into consideration the aforementioned violations, fined OTE with an administrative fine of 150,000 euros for the violations of the legislation on telecommunications and 150,000 euros on the violations of the legislation on competition.

### **Hearing concerning the Adoption of Interim Measures against VODAFONE**

In July 2003, VODAFONE informed the providers ALGONET S.A., FORTHNET S.A., LAN-NET S.A., NET ONE S.A., TELEDOME S.A., TELEPASSPORT (HELLAS) S.A. and VIVODI TELECOMMUNICATIONS S.A. on the intention to reform the charges of corporate "packages" used by new fixed voice telephony providers for the routing of calls to VODAFONE's network. Specifically, the reformation that VODAFONE wanted to execute, concerned the increase of the charge from 0.087 to 0.186 euros per minute (for calls to a VODAFONE mobile phone) in the cases where the traffic would exceed 1,000 minutes per month for every connection.

EETT, after relevant complaints from the aforementioned providers, summoned VODAFONE to a Hearing and issued a Provisional Order so that VODAFONE would not proceed to the implementation of its new corporate usage programme until the issuance of a Decision on Interim Measures by EETT.

VODAFONE's commercial policy limited the use of GSM-gateways (GSM-gws) by new providers. GSM-gws are terminal devices of fixed voice telephony, which operate legally and circulate freely in the market. Through their use, a call from a fixed to a mobile telephone is transformed to a call from a mobile to a mobile telephone, thus reducing the cost of calls that originate from a fixed point and are destined to terminate on mobile telephony subscribers. It is noted that the new providers, in order to make enable the communication of their subscribers with subscribers of other mobile telephony providers, have two choices:

<sup>45</sup> EC Regulation 2887/2000.

<sup>46</sup> EETT Decision 278/78/2003.



- The interconnection of their networks directly with the networks of mobile telephony providers, or with the network of another provider operating as a forwarding network.
- The use of GSM-gws devices.

Based on a relative analysis by EETT, the cost of new providers in the first case was on average 54% higher than the respective cost in the second case.

EETT, taking into consideration the above, decided<sup>47</sup> to adopt Interim Measures so that VODAFONE does not implement the commercial policy in question until the final Decision is issued. The principal points of the specific Decision were:

- The pursued price increase of service provision by VODAFONE, to new providers that act as resellers, constituted a violation of telecommunications legislation<sup>48</sup>.
- The tariffs increase of service provision would result in irreparable damage to denouncers.
- The traffic executed through GSM-gws, presented an exponential increase during that period and constituted an important percentage of voice telephony traffic among new providers.

- There was a need to examine the market's operation, which was obviously malfunctioning and more specifically there was a need to properly inform consumers on the quality of services that were provided through the GSM-gws and to evaluate the development of telecommunications through their use.

EETT's final decision concerning the aforementioned case is expected to be issued in the first semester of 2004.

### Administrative Penalties to Telecommunications Providers during the Year 2003

| Table 13       |   |                     |
|----------------|---|---------------------|
| Table of Fines |   |                     |
| Provider       | Reason  | Total Fines (euros) |
| OTE            | - Violations of the legislation on telecommunications<br>- Violations of the legislation on competition | 1,070,000           |
| COSMOTE S.A.   | - Violations of the legislation on telecommunications   | 300,000             |
| VODAFONE       | - Violations of the legislation on telecommunications   | 300,000             |
| FORTHNET S.A.  | - Violations of the legislation on competition  | 44,020              |

<sup>47</sup> EETT Decision 295/79/2003.

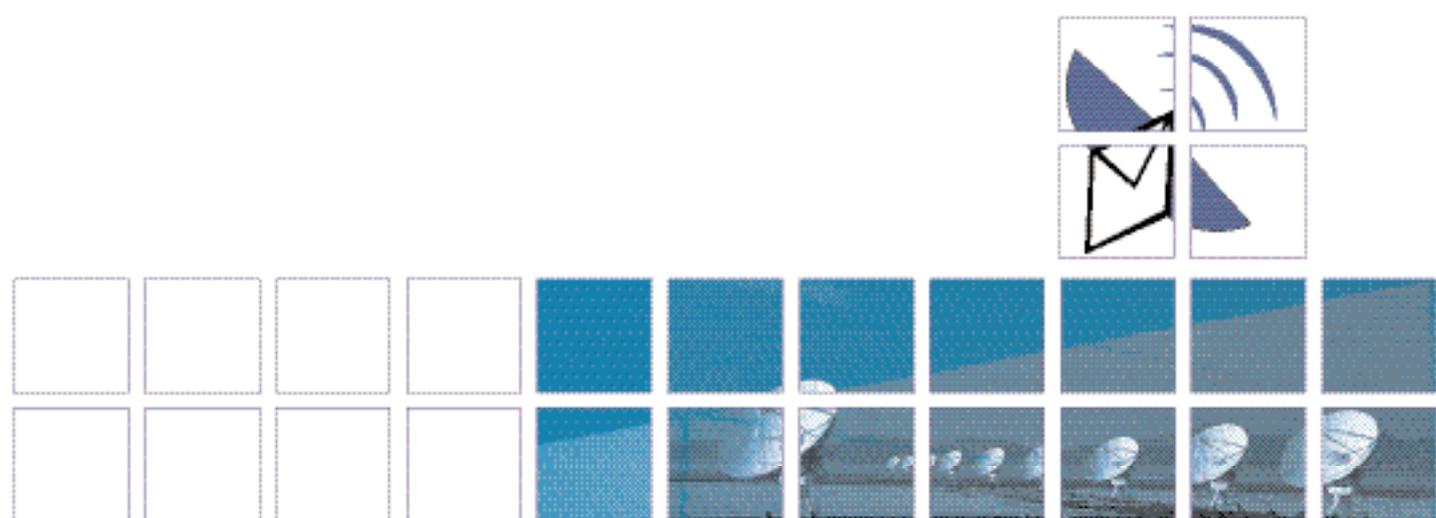
<sup>48</sup> The provisions of par. 3 of article 8 of L. 2867/2000 combined with PD 165/99 and EETT Decision 275/72B/2003, as well as the relevant provisions on the protection of competition and the provision of article 2 of L. 703/77.



Table 14

Table of Recommendations

| Provider                       | Recommendation on   |
|--------------------------------|---|
| ALGONET S.A.                   | - Violation of the legislation on transfer of company capital of provider granted with Individual Licence   |
| OTE                            | <ul style="list-style-type: none"> <li>- Violation of the legislation on competition in relation with OTE's offer for reduction of national calls' charge for the period 25-12-02 to 01-01-03</li> <li>- Violation of cost-orientation obligation in the framework of OTE's contractual relations with TELEDOME S.A.</li> <li>- Violation of the obligation to issue and distribute unified telephone directories</li> <li>- Violation of the telecommunications legislation and specifically of the Regulation on the Management of NNP's Short Codes</li> </ul> |
| COSMOTE S.A.                   | <ul style="list-style-type: none"> <li>- Violation of the obligation to issue and distribute unified telephone directories</li> <li>- Violation of the telecommunications legislation and specifically of the Regulation on the Management of NNP's Short Codes</li> </ul>  |
| VODAFONE                       | - Violation of the obligation to issue and distribute unified telephone directories   |
| STET HELLAS S.A.               | - Violation of the obligation to issue and distribute unified telephone directories   |
| INFO QUEST S.A.<br>(Q-TELECOM) | - Violation of the obligation to issue and distribute unified telephone directories   |
| IDEAL TELECOM S.A.             | - Violation of the legislation on transfer of company capital of provider with Individual Licence   |



## RADIO SPECTRUM SECTOR



## 4. Radio Spectrum Sector

In the sections that follow, we present in detail the total of actions per EETT's responsibility, in the radio spectrum sector. The general framework of these responsibilities includes the safeguarding of the optimum and legal use of radio spectrum and the control of radio telecommunications equipment. The actions presented in this Chapter focus on the following:

- Completion of the existing regulatory framework.
- Optimisation of spectrum management mechanisms.
- Ensuring the adherence to the spectrum usage terms.
- Protection of public safety critical services, from harmful interferences.
- Introduction of suitable specifications for the placement on the market and use of Radio Equipment and Telecommunications Terminal Equipment (RTTE).
- Procurement of the National Spectrum Management and Monitoring System (NSMMS).

### 4.1. Optimum Spectrum Usage

#### 4.1.1. Completion of an Up to Date Regulatory Framework

##### Regulation on Radio Frequency Usage Fees

In 2003, EETT's goal was the implementation of an efficient radio frequency spectrum pricing policy, based on the establishment of a clear and objective economic framework of spectrum use. Specifically, EETT, after the evaluation of a relevant study conducted in 2002, amended the existing fees Regulation<sup>49</sup>.

The amendment led to the establishment of a modern and effective charging framework of the radio frequency spectrum, which:

- Covers every radiocommunications service that requires radio frequency assignment by EETT.
- Is based on objective criteria for the definition of spectrum usage value, taking into consideration the continuous decrease of available radio frequencies, due to the rapid increase of wireless networks in the modern telecommunications markets.
- Uses appropriately selected charging indices, thus contributing to the reduction of spectrum unreasonable use. Phenomena of unreasonable use are widely observed in saturated geographical areas with increased radio frequency use, such as Athens, or in cases of particularly occupied bands, such as Private Mobile Radio (PMR) Networks bands.
- Provides motives for the use of modern technology equipment, reducing the usage fees for equipment using digital technology.
- Supports charging procedures, which are easily applicable in computer systems.

##### Channelisation

Channelisation constitutes an important planning tool for the rational and efficient use of the spectrum. In 2003, EETT drafted a text on the Channelisation of radio frequency bands, which are cited in Table 15, for their use by the Fixed Service for digital systems of data transmission and for analogue systems of image and sound transmission. The text was drafted according to the National Frequency Allocation Table (NFAT), as well as to the relevant recommendations and specifications.

<sup>49</sup> EETT Decision 276/49/2003, GG Issue 256/B/04-03-2003.



| Table 15                        |   |
|---------------------------------|---|
| Channelisation of Fixed Service |   |
|                                 | 1,700 – 1,710 MHz                       |
|                                 | 1,785 – 1,800 MHz                       |
|                                 | 2,025 - 2,110 MHz and 2,200 – 2,290 MHz |
|                                 | 3,600 – 4,200 MHz                       |
|                                 | 5,925 – 6,425 MHz                       |
|                                 | 6,425 – 7,110 MHz                       |
|                                 | 7,125 – 7,425 MHz                       |
|                                 | 7,425 – 7,725 MHz                       |
|                                 | 7,725 – 8,275 MHz                       |
|                                 | 8,275 – 8,500 MHz                       |
|                                 | 10.3 – 10.5 GHz                         |
|                                 | 10.7 – 11.7 GHz                         |
|                                 | 12.75 – 13.25 GHz                       |
|                                 | 14.5 – 15.35 GHz                        |
|                                 | 17.7 – 19.7 GHz                         |
|                                 | 22.0 – 23.6 GHz                         |
|                                 | 37.0 – 39.5 GHz                         |
|                                 | 55.78 – 57 GHz                          |

Based on this text, EETT, during the period from 1<sup>st</sup> to 21<sup>st</sup> of November, 2003, carried out a Public Consultation so that the telecommunications undertakings, the manufacturers of wireless devices, the researchers and all the interested bodies could express their opinions concerning:

- The existing situation of radio spectrum use in the aforementioned bands.
- The possibility of operation of the existing marketed equipment, in the aforementioned bands, according to the proposed Channelisation.

EETT plans to implement Channelisation in the immediate future, taking into consideration the comments of interested parties.

#### 4.1.2. Frequency Assignment

##### Terrestrial Microwave "Point-to-Point" Link Networks

Terrestrial Microwave "Point-to-Point" Link Networks consist of fixed radio stations that communicate between them through high-frequency wireless links. These networks play an important part in the liberalisation of the telecommunications market, as they offer to new-entrants the opportunity to deploy, within a short period of time and at a relatively low cost, backbone telecommunications networks alternative to those of the incumbent providers, which usually use wire links to connect their network nodes.

The Terrestrial Microwave "Point-to-Point" Link Networks belong to persons or legal entities that use radio frequencies, either for the provision of public telecommunications services or for the coverage of own telecommunications needs (own use).

The second category concerns:

- a) Telemetry and telecommand applications for the coverage of monitoring and remote systems control needs.
- b) Radio or television stations for the transmission of their programme's image or/and sound from the point of production to the point of transmission.
- c) Interconnection of stations/transmitters of the Fixed Point-to Point Service, for the transmission of voice or/and public services data, aiming to cover public safety needs.
- d) Radio location applications for the definition of position, speed or other characteristics of ships, airplanes etc.

During 2003, 3,198 radio frequencies were assigned in total for "Point-to-Point" links, which mostly concerned networks of telecommunications services providers. Furthermore, 49 radio frequencies were assigned to radiocommunications networks for own use.



### **Fixed Satellite Services**

Provision of satellite services requires the installation and operation of terrestrial stations linked to geostationary satellites for radio-television broadcasting and data transmission, nationally and internationally, on a permanent or occasional basis, and the operation of Very Small Aperture Terminals (VSAT) for voice and data transmission.

Installation and operation of terrestrial satellite stations require procedures for national and international coordination with existing national and international wireless networks, satellite and terrestrial ones. In this context, during 2003, EETT implemented the provided by the International Telecommunication Union (ITU) procedures for the harmonisation of each satellite station's operation with the existing wireless networks. EETT has also developed template application forms, together with relevant guidelines for their completion, available at the EETT website.

In total, in 2003, 5 satellite channels were assigned to terrestrial satellite infrastructure stations and 35 to dependent VSAT network topology stations, while 3 satellite stations were modified, accounting to the total number of applications submitted to EETT within the year. They mainly concerned telecommunications services providers' networks.

Furthermore, the procedure for radio frequency assignment to fixed infrastructure stations commenced, for own telecommunications needs relating to the operation of HELLAS SAT, the first Greek-Cypriot satellite. At the same time, the procedure for the licensing of OTE satellite stations began.

Finally, it must be stressed that according to the International Regulation on Radio Frequencies (Radio

Regulations), all countries must notify to ITU the terrestrial satellite stations operating in their territory, so that international coordination is achieved and mutual interferences avoided. In this framework, EETT in collaboration with the Ministry of Transportation and Communications (MTC), drafted a list of licensed satellite stations, along with all their technical specifications, aiming to register them in the International Radio Frequencies Registry.

### **Private Mobile Radio Networks**

The term "Private Mobile Radio (PMR) Networks" is used to describe the radio networks of land mobile service. Typically, these consist of mobile radio transceivers that communicate with a central station, called base station, and are used to cover the communication needs of various professional users, as well as emergency services. Examples of such networks are the communications networks used by radio-taxis and transportation companies, as well as emergency networks such as those used by the Fire Brigade (FB) and the National First Aid Center (NFAC). These networks are intended exclusively for private use and not for provision of public telecommunications services; thus their commercial exploitation is prohibited, as also their connection to the public telecommunications network. They are divided into two broad categories: the local coverage networks, which cover a small area within a range of few kilometers and the regional coverage networks, which cover a wider area that may extend to two or more prefectures.

Operating licences for PMR Networks are issued by the Prefectural Authority, following a concurring opinion by EETT, which assigns the corresponding operating frequency. Licences are valid for three years since their issuance date.



During 2003, all applications concerning local and regional coverage networks were processed. In total, 202 applications were submitted, out of which 125 were satisfied by the assignment of the respective radio frequency and 6 were rejected. Furthermore, 71 cases with insufficient data were returned to the respective Prefectural Authorities.

It is worth mentioning that the free movement and use of PMR wireless devices, characterised as PMR 446 is now permitted, under the condition that the aforementioned equipment meets specific technical requirements, as defined in EETT's relevant Decision<sup>50</sup>. These devices operate in the 446,000 - 446,100 MHz band and are used for the transmission of voice in short distances.

### **Support Services in the Transmission of Image and Sound**

An important category of services –especially in view of the 2004 Olympic Games- are support services in the transmission of image and sound. Examples of such services are the coverage of a football game, an open show or an emergency. These activities are supported by Electronic News Gathering/ Outside Broadcasting (ENG/ OB) crews.

For the coverage of such events, equipment, such as wireless cameras, wireless microphones and portable microwave links, is required. Image and sound (i.e. among studios) are transmitted through an outside broadcasting vehicle or Satellite News Gathering (SNG) vehicle.

EETT, in an effort to provide the quickest service to

these users, has published in its website application forms (in Greek and in English) for temporary radio frequency assignment concerning scheduled or non scheduled events.

In 2003, 20 radio frequencies were assigned to satellite news gathering stations (SNG and Fly Away<sup>51</sup>), accounting to the total of applications submitted to EETT. The aforementioned applications mostly concerned the portable image and sound transmission satellite stations from international users for the coverage of events such as the Greek presidency of the European Union (EU) and various athletic events (European football championship and Test Events of the 2004 Olympic Games).

Furthermore, in 2003, the NFAT amendment was issued by the MTC following a relevant EETT proposal, according to which the use of wireless microphones with effective radiated power 10 mW, in the frequency bands 174-216 MHz, 470-838 MHz and 863-865 MHz is allowed without a licence. These devices will operate following coordination, in order to avoid any interference.

### **4.1.3. Antenna Licensing**

Among EETT's competences, based on the Law 2867/2000, is the review of requests for the provision of Antenna Mast Construction Licence.

In 2003, the first Antenna Mast Construction Licences servicing 3G systems, were granted. The Regulation on Licences for Antenna Mast Constructions<sup>52</sup>, contributed to the rapid development of the aforementioned systems, giving providers the possibility to develop with

<sup>50</sup> EETT Decision 14100/2002, GG Issue 328/B/19-04-2002.

<sup>51</sup> Fly Away: Easily transported equipment that allows rapid satellite connection in distant areas for data, sound and image transmission.

<sup>52</sup> EETT Decision 236/79/2001, GG Issue 1649/B/11-12-2001.

flexible procedures, 3G networks on already licensed constructions.

EETT's Regulation on Microcell systems<sup>53</sup> will also contribute to this end, allowing the installation of small mobile telephony base stations with specific characteristics, through a simple notification to EETT. The aforementioned procedure will facilitate the rapid spread of 3G networks that use a dense network, which in its majority consists of short range base stations (microcells).

During 2003, EETT received 1,213 new requests for licensing of antenna mast constructions. In total, 1,072 requests were processed (814 granted Licences, 122 rejected requests and 136 revoked Licences).

All the data of licensed antenna mast constructions is registered in the National Antenna Mast Constructions Registry (NAMCR) maintained by EETT, ensuring the

immediate provision of information to all interested parties concerning antenna mast constructions and the assessment of conformity to the conditions provided by the telecommunications legislation.

#### 4.1.4. Optimisation of Spectrum Management Mechanisms

In 2003, EETT focused on the NRFR update , as well as on the institution of effective procedures concerning the management of the Radio Spectrum.

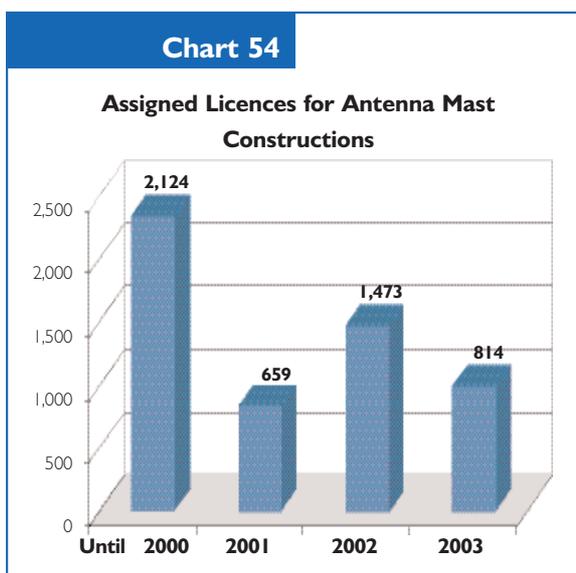
#### Update of the National Radio Frequencies Registry

The National Radio Frequencies Registry (NRFR) constitutes the essential tool for the radio spectrum management. EETT updates the NRFR and registers in it all radio frequencies assigned in the Greek state.

In 2003, emphasis was given to the continuation of the NRFR update in intensive rates, in view of the Olympic Games, giving priority to the prefecture of Attica and the other Olympic cities. Specifically, the procedure included two phases. The first phase concerned the prefecture of Attica and the second phase the rest of Greece.

The actions undertaken are the following:

- Registration in the NRFR of all assigned fixed and mobile service radio frequencies to various bodies Civil Aviation Authority-CAA, National Intelligence Service-NIS, FB, Hellenic National Defense General Staff-HNDGS, Hellenic Army General Staff-HAGS, Hellenic Navy General Staff-HNGS, Hellenic Airforce General Staff-HAFGS, Hellenic Coastguard-HCG.



Source: EETT

<sup>53</sup> EETT Decision 302/11/2003.



- ▶ Performance of measurements in various bands of the radio spectrum and cross-checking of results with the data of the NRFR.
- ▶ Tracking illegally broadcasting users.
- ▶ Informing Prefectural Authorities of Olympic cities and PMR Networks users, on expired Licences.
- ▶ Deletion of frequencies from the NRFR, based on the relative EETT Decisions<sup>54</sup>.

### **Integration of Frequency Assignment – Antenna Mast Construction Licences Data Bases**

EETT, in an effort to implement more flexible procedures for reviewing and processing the spectrum management requests, proceeded in 2003 to the integration of the NRFR and the NAMCR, i.e. the radio frequency assignment database and the antenna mast construction licensing database respectively. An additional control of the data included in the two databases was performed, with the aim to identify any discrepancies.

The integration of the two registries, in October 2003, led to the creation of a common database, in which every Antenna Mast Construction is linked to the radio communications station that the frequencies have been assigned.

### **Assignment Criteria Study**

A particularly important factor in the implementation of an optimum spectrum management policy is the selection of the suitable radio frequency assignment criteria, which ensure quality services and coordination for as many users as possible.

According to the European practice and the international recommendations, the radio frequency assignment depends in general on:

- a) The type and nature of the service, for which radio frequencies are requested.
- b) The desirable geographical coverage with satisfactory signal power.
- c) The compatibility, i.e. the possibility of "coexistence" with other systems or services.
- d) The capacity of the system. The basic criterion of capacity is the number of users, in combination with a statistical study of the communication frequency.

Based on all the above, the possibility of reuse of the same (or an adjacent) radio frequency is defined in a way that unwanted interferences are avoided. Furthermore, in this case, the technological requirements for the quality of transmitters and receivers are taken into consideration.

On an international level, there is no mutually accepted solution for the definition of the optimum radio frequency assignment criteria. EETT, based on the international radio communications regulations and the relevant policies implemented by the National Regulatory Authorities (NRAs) of the other European countries, examines and adopts reliable radio frequency assignment criteria.

<sup>54</sup> EETT Decision 284/58/2003, GG Issue 831/B/25-06-2003, EETT Decision 290/93/2003, GG Issue 1260/B/03-09-2003 and EETT Decision 292/50/2003, GG Issue 1535/B/17-10-2003.



## 4.2. Ensuring the Radio Spectrum Legal Use

### 4.2.1. Radio Spectrum Monitoring

#### 4.2.1.1. Protection of High Priority Networks

Protection of wireless networks related to the protection of human life and public safety is a top priority for EETT. Indicative examples of such networks are the networks of the CAA, the Armed Forces, the Police, the FB, and the NFAC.

#### Civil Aviation Authority Networks

The Air Navigation Band (108 - 137 MHz) is located right next to the band used for FM radio broadcasts (87.5 - 108 MHz). As a result of this adjacency, there are potential risks of interference from radio broadcasts in the Air Navigation frequency band. This interference is usually due to the excessive power of some radio broadcasts, in combination with the installation of their antenna systems. This results in the creation of interference effects in radio aid frequencies and CAA communications, which prevent their smooth operation with negative consequences for the safety of flights.

From the above, it becomes clear that radio broadcasts should not take place in a reckless manner. Recommendation 1009 of the International Telecommunication Union - Radiocommunications (ITU-R), imposes the obligation for harmonisation of radio broadcasts with Air Navigation frequencies. This harmonisation results in the need to impose a set of concrete technical specifications, which must be met by radio broadcasting stations. These specifications concern mainly the frequency and position of broadcasting, the effective radiated power and the radiation pattern of transmitting antennas. In its entirety,

the set of technical specifications that radio broadcasts in each area must meet are usually referred to as "FM Radio Frequency Map".

Regarding Greece, maps have been drawn up for every Prefecture. Nevertheless, with the exception of the Attica Prefecture, these Maps have not yet been applied. Even in Attica, the organised Antenna Parks, provided by the law, have not been established yet.

EETT, in 2003, proceeded to relevant inspections in the entire Greek territory. Specifically, EETT units visited areas where the CAA has installed telecommunications stations-such as Mount Geraneia and Mount Akarnanika- as well as airports facing interference problems –such as the airports of Mytilini and Rhodes-with the aim to conduct a technical study on the existing situation, intervening decisively towards the problem's resolution. Furthermore, EETT's units intervened mainly in Attica, in real time, especially for the resolution of interference problems in CAA communications.

#### Other High Priority Networks

EETT performed on the spot inspections in areas where the Hellenic Police (Lamia, Evoia) and the NFAC (Patra) faced interference problems. The type of interference was instantly identified and the procedures for the resolution of the issues were scheduled.

Furthermore, EETT's supervisory role was important during the two EU summits in April 2003 in Athens and in June 2003 in Chalkidiki, where the heads of state of all member-states participated. EETT in collaboration with the Hellenic Police, intervened effectively wherever was necessary, with the mobile radio direction-finding unit, in order to protect the security frequencies from possible interferences.



#### 4.2.1.2. Recording & Control of Radio Transmissions Technical Characteristics

##### Mount Hymettus Broadcasting Center

In addition to the State-owned radio-television organisation, the Mount Hymettus broadcasting center houses the majority of the licensed private radio stations. In 2003, EETT continued the broadcasting controls from the aforementioned center, in order to respond effectively to its controlling role, mainly as far as it concerns the security of air navigation communication and more specifically those of the Athens International Airport (AIA) "Eleftherios Venizelos".

Specifically, during the first semester of 2003, EETT completed the recording and marking of all broadcasting installations technical equipment of licensed radio stations in Attica, using the specific center. The data collected was used for the creation of an electronic broadcasting equipment file per station. The completion of the recording and marking of equipment rendered possible the tracing of radio stations that operated illegally. Following that, EETT collaborated with the competent Forest Authority, forwarding to it all the relative data, with the aim to commence the removal procedure of all illegal installations.

An important step towards the suppression of interferences in AIA's frequencies, were the daily systematic recordings of the radio spectrum conducted by EETT, in order to control the observance of the broadcasting technical specifications, by the 35 licensed private and public radio stations of the Attica prefecture, according to the FM Radio Frequency Map.

In order for this task to be facilitated, EETT's two Fixed Monitoring Stations (FMS) were used, which have been installed in its premises in Maroussi and in the AIA. In cases where violations were ascertained, either exceeded maximum Effective Radiated Power (ERP) limits, or maximum frequency deviation, EETT forwarded the measurements to the National Radio – Television Council (NRTC), which is competent for the imposition of administrative penalties on violators. Indicatively, EETT referred 90 cases of exceeding the maximum frequency deviation limits and 39 cases of exceeding the maximum ERP.

##### Remaining Country

In 2003, EETT continued the recording of operating radio stations outside Attica, aiming to imprint the country's radio spectrum. EETT's technical units performed recordings in the prefectures of Dodekanisa (island of Rhodes), Lesvos, Argolida, Korinthia, Voiotia, and Evoia.

From the results of the recordings, the following were ascertained:

- a) The installation of stations antenna systems in a disorderly and arbitrary manner.
- b) The non observance of the Frequencies Map and the operation of more radio stations than those provided in the relevant Ministerial Decisions (MD). Indicatively, we mention cases of radio stations that broadcasted from five different locations within the limits of the same prefecture.
- c) The above, in combination with the non observance of technical specifications and the dense installation of antenna systems in many broadcasting centers, resulted in many cases in the creation of interference effects in air navigation frequencies.

**Table 16**

**Comparison of the Number of Operating Radio Stations  
with the Provisions of the Frequencies Map**

| Prefecture              | Number of Frequencies |  |
|-------------------------|-----------------------|--|
|                         | Recording             | Provision based on the Frequencies Map |
| Dodekanisa (Rhodes)     | 54                    | 21                                     |
| Lesvos (except Limnos)  | 28                    | 9                                      |
| Argolida                | 47                    | 10                                     |
| Korinthos               | 39                    | 11                                     |
| Evoia (North & Central) | 33                    | 8                                      |

In Table 16, we present the results from the survey of operating private radio stations, in comparison to the number provided by the Frequencies Map, for the private radio stations in every prefecture.

The existing situation requires a comprehensive overall approach and the application of systematic methods in order to resolve the problems that arise. The illegal installation and operation of non-licensed radio and television station entails also the violation of several other provisions of the legislation in force (trespassing on forest area, illegal connection to the power supply network etc.). Consequently, putting an end to this phenomenon requires cooperation of all involved parties –EETT, MTC, NRTC, Prefectures, Town Planning Authorities, Forest Authority, Ministry of Environment, Physical Planning and Public Works (MEPPPW), Hellenic Police- until the problem is finally resolved, through the establishment of the radio-television parks provided by the Frequencies Maps, organised in accordance with international standards. To this end, EETT forwarded the results of the recordings along with the necessary comments, to the competent bodies.

#### 4.2.1.3. Private Mobile Radio Networks

In 2003, in view of the Olympic Games, EETT control

mechanisms on frequency bands assigned to PMR Networks, were intensified with the aim to ensure the unimpeded operation of licensed users and the effective management of radio spectrum.

The frequent illegal use of assigned frequencies was ascertained, resulting in interferences and obstruction of the smooth operation of legally operating PMR Networks. In all cases, the necessary actions for the imposition of penalties were scheduled.

Furthermore, throughout the Test Events, EETT technical units performed measurements and controls in all areas hosting them.

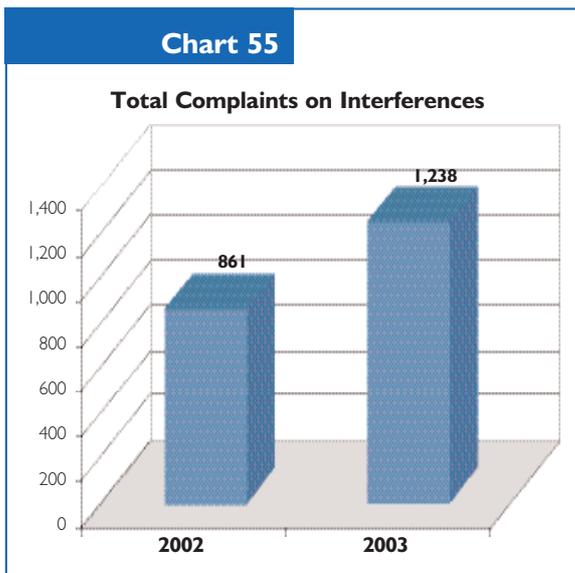
#### 4.2.1.4. Complaints/ Interferences Management

One of the most important EETT activities in the sector of radio spectrum monitoring, during the year 2003, was the investigation of interferences complaints from spectrum users and citizens. In order to respond to the particularly increased spectrum monitoring needs in regions other than Attica, EETT cooperated with the Transportation and Communications Departments of the local Prefectural Authorities, on one hand, and with University Institutions, on the other. These organisations



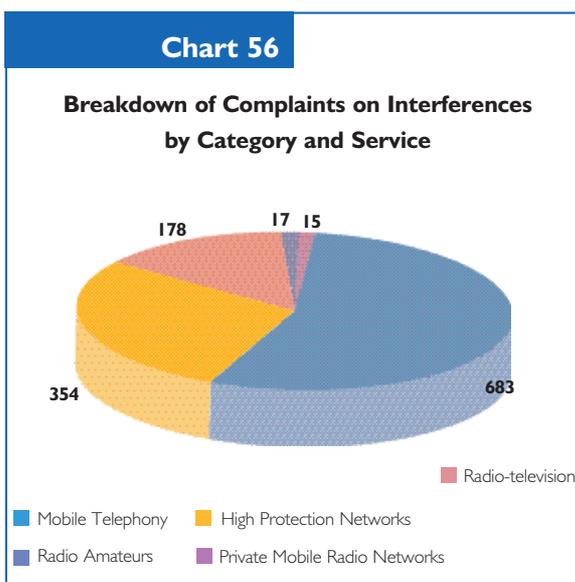
contributed significantly to the work of the Monitoring Department.

The total number of complaints for 2003 amounted to 1,238, an increase of 43.8% in relation to 2002, as it can be seen in Chart 55.



Source: EETT

The distribution of the aforementioned complaints per service, for 2003, is presented in Chart 56.



Source: EETT

In more detail, 354 interference cases were recorded in the aforementioned high priority networks, the majority of which concerned the CAA. In their total, the aforementioned interference cases in the Attica region, were immediately resolved. To this success contributed the institution of EETT 24hour Standby, according to which the monitoring operation is activated at any time during the day a serious interference problem that may cause hazards for the human life safety, arises. At the same time, technical units were dispatched in order to face similar problems in the rest of the country.

The cases of requests/ complaints that concerned mobile telephony antenna mast constructions amounted to 683. Following a detailed examination of the necessary documents, it was ascertained that 604 cases concerned licensed antennas and the applicants/ denouncers were notified of their legality. For the remaining 79 cases, which concerned non-licensed constructions, EETT's technical units performed 66 autopsies in total, in mobile telephony base stations. From those autopsies, 58 took place in Attica and 8 in other parts of the country. Furthermore, 4 cases were assigned to the Mobile Radio Communications Laboratory of the National Technical University of Athens (NTUA) and 4 to the Radio Communications Laboratory of the Aristotle University of Thessalonica (AUTH), whereas for 5 complaints outside Attica, the contribution of the respective Prefectures was requested.

In what concerns complaints for interferences in radio stations, these amounted to 178, out of which:

- 72 concerned the region of Attica and particularly:
  - 22 interferences complaints for licensed radio stations.
  - 18 interferences complaints for television stations.
  - 32 citizen complaints for existence of illegal radio stations, as well as interferences in

television receivers and other appliances, from illegal broadcasts.

The aforementioned complaints were investigated and the findings were forwarded to the NRTC and the MTC for the imposition of the administrative penalties provided by the radio-television legislation.

- 94 complaints concerned interferences outside Attica. These complaints were in their majority forwarded to the respective Prefectures.

At the same time, EETT became the recipient of a small number of complaints on interferences in PMR Networks (15). Emphasis was given to interference problems in the Radio networks of the Hellenic Police and the FB, for which a successful effort to resolve them was made.

Finally, EETT executed controls for the following cases:

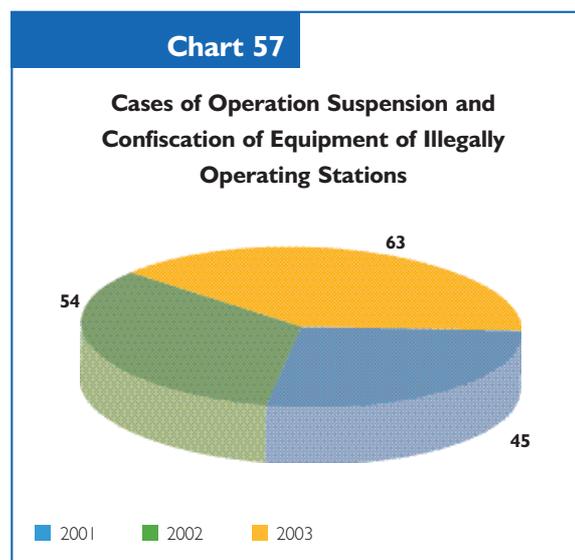
- 11 complaints concerning illegal radio amateur broadcasts and installations, as well as interferences in licensed radio amateurs.
- 6 cases in which radio amateurs were asked to verify the operation of their systems in accordance with their Licence terms.

#### 4.2.1.5. Administrative – Penal Sanctions

The controls mentioned in the previous sections, in combination with the recordings of EETT monitoring stations and the relevant complaints received during 2003, led to the tracing and confiscation of broadcasting equipment of 60 illegal radio-television stations (36 radio stations and 24 television stations), out of which 6 were confiscated in the broadcasting center of Chortiatis in Thessalonica, following EETT’s intervention, in collaboration with the State Security Directorate of the Hellenic Police. Furthermore, the

equipment of 3 illegal PMR Networks was confiscated too.

The total number of undertakings that were ceased from operation and whose equipment was confiscated, is presented in Chart 57, according to which an increase of 16% was noted in comparison to 2002.



Source: EETT

In what concerns illegal installations of antenna systems, EETT imposed administrative fines for 68 cases of illegal antenna mast constructions (see Table 17).

**Table 17**

**Total Fines for Illegal Antenna Mast Constructions**

| Providers         | Number of Illegal Antenna Mast Constructions | Total Fines (euros) |
|-------------------|--|---------------------|
| VODAFONE          | 21   | 249,436             |
| COSMOTE S.A.      | 29   | 327,784             |
| STET HELLAS S.A.  | 16   | 179,740             |
| INTRACONNECT S.A. | 1  | 14,674              |
| OTE               | 1  | 14,674              |



#### 4.2.2. Organisational Infrastructure

EETT, given the increasing volume of complaints and aiming to manage them in a more effective manner, proceeded to the design and implementation of a network complaint database. The database enables the monitoring of a complaint's investigation. The electronic collection of data allows the exploitation of useful information and the extraction of statistical data such as complaints management times, complaints per service category and per prefecture. The aforementioned system is directly linked to the scheduling and organisation of daily actions.

The daily management of the submitted complaints requires the involvement of technical units of personnel with a significant differentiation in their duties (interrogation employees detached from the Hellenic Police, technical staff, drivers, technical experts). Furthermore, the use of a large number of equipment of varied categories is required (vehicles, portable equipment, fixed equipment).

EETT, for the effective management of the aforementioned human and technical resources, started in 2003 the drafting of specifications for the implementation of a resource management system of ERP type (Enterprise Resource Planning).

#### 4.2.3. Installation of Technical Equipment

The establishment of the necessary infrastructures for the coverage of immediate control and monitoring needs was a basic concern for EETT in 2003. In this context and having already the experience from the installation and operation of the FMS in the AIA, during the previous year, EETT proceeded to the procurement and installation of suitable monitoring equipment in another two airports of the country, the airport "Nikolaos

Kazantzakis" in Herakleion of Crete, and the airport "Diagoras" in Rhodes.

The specific airports were chosen according to:

- a) The volume of traffic they support.
- b) The specialised radio aids they possess, such as the Instrument Landing System (ILS) in the airport of Rhodes.

It is worth stressing that, in Herakleion of Crete, due to the installation area of the FMS and the geography of the space, the station is also used for the monitoring of the spectrum in the wider Herakleion area.

The FMS include all the necessary equipment for the spectrum's monitoring in the 20 MHz to 1.3 GHz band, whereas there is the possibility for a future expansion of the monitoring band up to 3 GHz. The support software of the FMS provides remote control possibility of the station's operations from the Control Center, located in EETT's premises in Athens. Remote control allows the automatic execution of Monitoring Work Plans (MWP) from the stations at predefined intervals.

### 4.3. Placing on the Market and Use of Telecommunications Equipment

#### 4.3.1. Completion of an Up to Date Regulatory Framework

The status of placing on the market, free movement and use of RTTE, is defined on a pan-European level by Directive 1999/5/EC of the European Parliament and of the Council of the 9<sup>th</sup> of March 1999. Presidential Decree (PD) 44/2002 harmonised Greek legislation with the aforementioned Directive. According to PD 44/2002, EETT was assigned the responsibility for issues of placing on the market, free movement and use of RTTE.



EETT's principal goal for 2003 has been the completion of an up to date regulatory framework with the suitable specifications for the placing on the market and use of RTTE equipment in compliance with the requirements of the PD 44/2002.

In collaboration with a special consultant, who has undertaken the project of Spectrum Management Directorate organisation, EETT proceeded to the drafting and issuance of the following Regulations provided by PD 44/2002.

### **Regulation on the Notification of Radio Equipment to EETT**

In cases of radio equipment operating in frequencies the use of which is not harmonised throughout the EU, there is the obligation to notify to EETT the operational characteristics and the intention to place the equipment on the market. EETT, by a Decision<sup>55</sup> defined the procedure according to which the manufacturer of radio equipment, or his authorised representative in the EU, or the person responsible for placing the equipment on the market, submits the aforementioned notification.

Obliged parties must submit a notification to EETT, at least four weeks prior to the date of the radio equipment's placing on the market.

### **Notified Bodies Regulation**

This Regulation<sup>56</sup>, defined the criteria, the procedures and every other detail related to the assessment of bodies seeking to be designated as Notified Bodies, according to PD 44/2002. The Notified Bodies have as

a principal responsibility the a priori compliance evaluation of the equipment that manufacturers place on the market.

EETT is under the obligation to notify to the European Commission all bodies designated as Notified Bodies and to provide the required information for the update of Notified Bodies lists, published in the Official Journal (OJ) of the European Communities.

### **Regulation on the Publication of Technical Interfaces of Public Telecommunications Networks**

EETT, by a Decision<sup>57</sup>, defined the terms and procedures, according to which the public telecommunications networks providers are obliged to publish the technical specifications of their network interfaces.

The aforementioned publishing obligation applies to all interfaces through which access to telecommunications networks or/ and services is provided to the public. Indicatively, we mention the interfaces of wire and wireless networks, Leased Lines, Virtual Private Networks (VPN) and telephony networks, Integrated Services Digital Network (ISDN) and data services, telex, as well as the interfaces for available to public satellite services.

The publication of the technical characteristics of the public telecommunications network interfaces, must include adequate and detailed data, so that the design of telecommunications terminal equipment that can be connected to the above networks, offering all the services provided, is feasible.

<sup>55</sup> EETT Decision 296/49/2003, GG Issue 1881/B/17-12-2003.

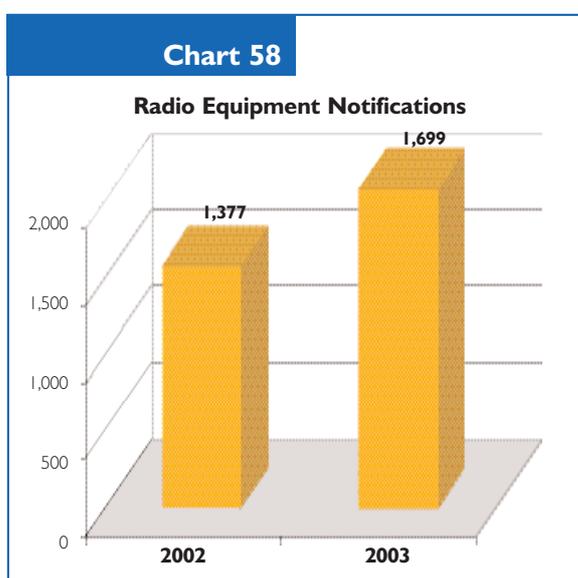
<sup>56</sup> EETT Decision 279/32/2003, GG Issue 441/B/14-04-2003.

<sup>57</sup> EETT Decision 294/55/2003, GG Issue 1590/B/30-10-2003.



### 4.3.2. Notifications Management

In 2003, EETT received a large number of radio equipment notifications submitted by the obliged parties, according to PD 44/2002 and the relevant Notifications Regulation (see sub-section 4.3.1.). A significant increase was noted in the number of submitted notifications, in relation to 2002, something that reflects the increased needs for RTTE in view of



Source: EETT

the 2004 Olympic Games. For covering these above needs, EETT completed the upgrade of the notifications management electronic system and proceeded to the creation of a common database, where all notifications submitted to EETT since 2001, can be found. This way, the handling time of the relevant requests has been significantly reduced. Furthermore, EETT is at the stage of acceptance test of support applications for the electronic submission and management of notifications, through internet interfaces.

The more efficient management of submitted notifications was also facilitated by the amendment of

NFAT. This amendment led to the harmonisation of the Greek framework of placing and use of Short Range Devices (SRDs), with the respective framework of the other European countries; thus placing on the Greek market and the use of this special category of radio equipment were rendered feasible.

### 4.3.3. Market Surveillance

Market surveillance aims to ensure the compliance of radio equipment that circulates in the Greek market with the requirements of PD 44/2002 and Directive 1999/5/EC. In this framework, EETT is responsible for administrative and technical controls of the RTTE placed on the market, actively contributing to the protection of consumers, the promotion of healthy competition and the avoidance of harmful interferences.

In 2003, EETT participated in a pan-European market surveillance campaign that was organised following a demand from the EU, mostly aiming to record the compliance of RTTE in the markets of member-states, with the administrative requirements of Directive 1999/5/EC. In every member-state, sample controls were conducted for 100 products of various categories of RTTE. After a statistical analysis of the results, useful conclusions on the administrative compliance of equipment on a pan-European level, are anticipated, which will be used for the definition of the optimum market control procedures.

It should be noted that EETT has investigated all complaints that were submitted for equipment not compatible with the requirements of the aforementioned PD. Furthermore, EETT monitors the compliance of equipment (mostly transmitters and receivers) included in the applications for frequency assignment.



#### 4.3.4. Participation in International Committees/ Groups

In the framework of the implementation of Directive 1999/5/EC on RTTE, EETT represents Greece in the Telecommunication Conformity Assessment and Market Surveillance Committee (TCAM). EETT submits requests for clarifications regarding the implementation of the Directive and follows closely all relative developments.

Furthermore, EETT participates in the Administrative Cooperation Group (ADCO) of the European Commission, which has as a principal goal to jointly encounter European RTTE market problems. At the same time, EETT follows the developments of Radio Regulations Enforcement workgroup (RR, former RRII) of the CEPT/ ECC (Conférence Européenne des Postes et Télécommunications - Electronic Communications Committee), which has as an objective the study and analysis of the market with the aim to assist NRAs on issues of spectrum monitoring and RTTE market surveillance.

#### 4.4. Procurement of National Spectrum Management and Monitoring System

In 2002, EETT initiated the procedure for the procurement of the NSMMS, a technologically advanced infrastructure of high standards on which spectrum management in Greece, will be based.

The NSMMS, along with the subsystems it includes, will directly support all the operations of spectrum management. Some of these operations are:

- Frequency assignment.
- Licensing and pricing.

- Technical analysis to avoid interferences.
- Suitability control of equipment used.
- Surveillance of spectrum's legal use.
- The continuous recording of spectrum availability.
- Tracing and suppression of illegal broadcasts.

As a result of the above, immediate benefits are expected. Indicatively, we mention the:

- Protection from illegal interferences in frequencies used by national security and defense services.
- Protection of networks used for the security of air navigation and navigation.
- Provision of reliable radiocommunications environment during the Olympic Games.
- Safeguarding spectrum's use, according to the specifications and the terms of the users' Licence.
- Tracing of spectrum's illegal use.
- Rapid development of new wireless technologies and applications and shaping of a competitive radiocommunications environment.
- Coordination of spectrum's use with neighbouring countries.

The NSMMS's implementation is divided into two phases:

The first phase, already under implementation, covers the prefectures of Attica and Thessalonica. The second phase is expected to cover the remaining country.

The NSMMS consists of two principal sub-systems:

- The Management System, which includes software for the support of operations such as the assignment of frequencies, licensing, pricing and frequency coordination.
- The Monitoring System, comprised by 5 FMS (3 in Attica and 2 in Thessalonica) and 7 Mobile Monitoring Stations (5 based in Athens and 2 based in Thessalonica).



For the proper exploitation of the NSMMS, the following are established:

- The National Control Center (NCC) in EETT's headquarters in Athens, which will host the Management sub-system and will coordinate the operation of Regional Control Centers (RCC).
- Two RCC, one in Athens and one in Thessalonica, monitoring the spectrum on a daily basis.

The structure of NSMMS is presented in Figure 3.

The final cost of the project amounts to 12,338,854 euros. It is noted that the project has been integrated in the Operational Plan "Information Society" (OP-IS) of the 3<sup>rd</sup> Community Support Framework (CSF). The system that will cover our country's needs, will fully operate in March 2004.

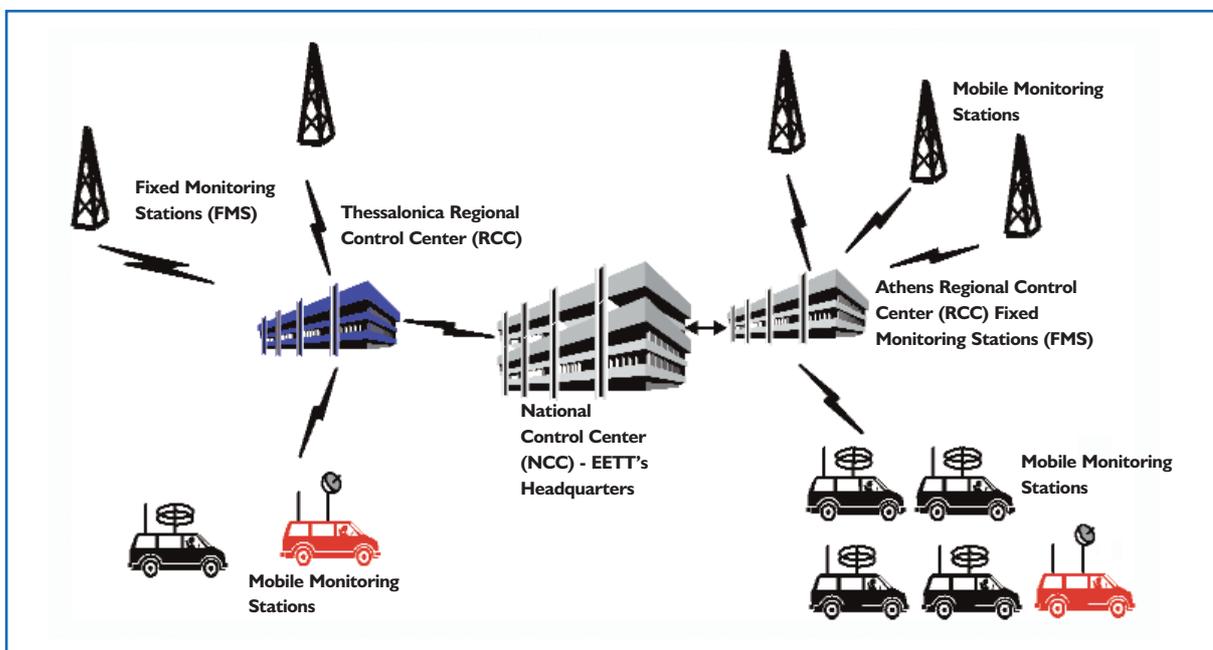
## 4.5. Internal Organisation of Spectrum Management Directorate

### 4.5.1. Organisational Study of Spectrum Management Directorate

Since 2002, EETT had assigned to an external consultant the execution of a study on the "Organisation of Spectrum Management Directorate". The goal of the aforementioned project was to form a detailed proposal on the organisation of the Spectrum Management Directorate. The study included in detail:

- A Report on the existing situation.
- Proposed policies and response times, considering the experience of other NRAs.
- Proposal for a series of interventions, in order to converge with the European practice.

Figure 3: Structure of NSMMS





- ▶ Action plans with the proposed interventions, for the improvement of efficiency and effectiveness.
- ▶ Regulation drafts on the coverage of EETT's responsibilities in Spectrum issues.
- ▶ Detailed organisational plan for the Spectrum Management Directorate.
- ▶ Template Documents for the Directorate's operation.
- ▶ Personnel Report for the Directorate.
- ▶ Report with description of proposed training.
- ▶ Support of competent authorities in order to ascertain the commission of offences related to spectrum usage or installation of illegal antenna mast constructions.
- ▶ Management of requests and complaints relating to spectrum usage.
- ▶ Conduction of autopsies and controls in transmitting or/ and receiving stations, as well as in antenna mast constructions.
- ▶ Collection of information on issues of spectrum management, necessary for the procedures of international coordination.
- ▶ RTTE market surveillance.

The greatest part of the study was delivered during 2003. The next stage is the provision of operational support from the consultant on the implementation of the organisational structure.

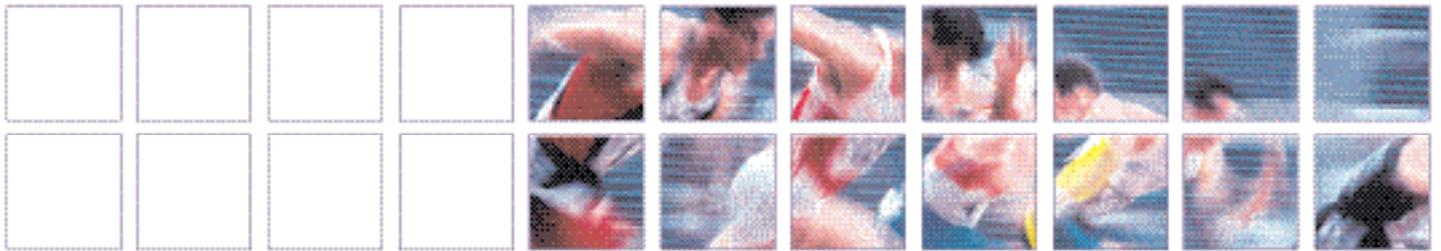
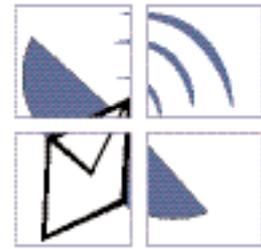
#### **4.5.2. Establishment of Regional Office in Thessalonica**

In 2003, EETT proceeded to the establishment and organisation of a Regional Office in Thessalonica, which started its operation on the 1<sup>st</sup> of December 2003. The goal of the establishment was the more rapid response of EETT in issues of its competence, concerning Northern Greece and more specifically, the areas of Macedonia, Thraki and Thessalia.

The responsibilities of the Regional Office in Thessalonica include:

- ▶ Monitoring and control of spectrum usage.
- ▶ Tracing of interferences or broadcasts from illegal users.
- ▶ Control of the observance of the Licence terms as well as the quality of provided services, of the Licence holder.

The Regional Office in Thessalonica will consist in total of 12 executives. Six of these positions have already been filled while the hiring procedure for the remaining positions, is already in progress.



**OLYMPIC GAMES:  
EFFECTIVE MANAGEMENT OF RADIO COMMUNICATIONS**



## 5. Olympic Games: Effective Management of Radio Communications

During the 2004 Olympic Games, EETT will execute significant tasks, particularly critical for the success of the Olympic Games.

Having as a primary goal the smooth and unimpeded operation of radio communications, EETT planned and implemented a total of actions that includes all sectors under EETT's responsibility, presented in detail in the following Sections.

### 5.1. Assignment of 2G Mobile Communications Spectrum

In 2003, EETT proceeded to the temporary spectrum assignment of 2G Mobile Communications to mobile telecommunications providers who expressed interest, in order to face their increased network coverage needs, in the area of Attica during the Olympic Games.

To this end, EETT carried out a Public Consultation, where the mobile telecommunications providers were invited to express their opinions concerning:

- The procedure that should be implemented for the temporary assignment.
- The spectrum bandwidth that could be assigned to each provider.
- The duration of the temporary assignment.
- The geographical area, where the use of spectrum could take place.
- The usage fee, which they would have to pay.

Taking the Consultation's results into consideration, EETT proceeded to the adoption of the following procedure for the temporary spectrum assignment.

Given that the available spectrum for the provision of 2G mobile services was 2x20 MHz in the spectrum area of DCS 1800, EETT divided the spectrum into four parts of 2x5 MHz, in order to proceed to the temporary assignment of one part to each mobile telecommunications provider, provided it was requested. The spectrum would be assigned for the time period from 1<sup>st</sup> June 2004 – 30<sup>th</sup> September 2004 and could be used only in the area of Attica. The spectrum usage fees, which the undertakings would pay for one part of spectrum DCS 1800 2x5 MHz, would amount to 344,000 euros.

Following the above, interest was expressed and the providers COSMOTE S.A., VODAFONE and STET HELLAS S.A. were assigned spectrum. In the beginning of 2004, the sealed tenders' auction for the assignment of the remaining part, is expected to take place.

### 5.2. Frequency Assignment

The increased demands for frequency assignment, which, as already mentioned, are expected to arise during the Olympic Games, mainly result from the following:

- A particularly important part of the infrastructure used, consists of systems for the wireless transmission of data, voice and image, due to the flexibility, ease and deployment speed characterising them.
- The users of the aforementioned systems will be many and diverse. We indicatively mention television/radio organisations and stations crews, Olympic Games security teams, the ATHENS 2004 Olympic Games Organising Committee (ATHOC), security bodies that will accompany foreign officials and dignitaries, emergency services.



- The systems will be used for the coverage of events that will be held in various areas, so most of the system's equipment will be transported wherever needed.

Until the beginning of the Games, 9,000 applications for frequency assignments are expected to be submitted, supporting a wide range of services and covering the whole area of Attica and the four Olympic cities. The main services provided during the Games are:

- Portable – Mobile Radios.
- Land Mobile Service.
- Wireless Microphones.
- In ear monitor devices.
- Talk back services.
- Translation – Guiding Services.
- Fixed "Point-to-Point" Links.
- Telemetry – Telecommand Services.
- Wireless systems for production and transmission of radio-television signal and satellite communications (ENG/ OB).
- Satellite communications (SNG, Fly away).
- Wireless Local Networks.

In order to service the users, EETT designed and ATHOC implemented the "e-spectrum" network application. Through this application, interested radio frequency users can obtain information on the current radio frequency licensing status for the Olympic Games, submit their applications and monitor their progress via the Internet. This application is already available on the Internet ([http://services.athens2004.gr/espectrum/home\\_page.asp](http://services.athens2004.gr/espectrum/home_page.asp)).

EETT received a large number of frequency assignment applications, through "e-spectrum" in the time period from August – December 2003, due to the holding of Test Events. All these applications were successfully examined and processed.

### 5.3. Spectrum Monitoring Preparation for the Olympic Games Needs

EETT has set as its primary goal, the continuous and uninterrupted monitoring of the radio spectrum, during the Olympic Games. This goal is particularly important, taking into consideration that unimpeded spectrum usage must be safeguarded for the security of the Games, as well as for the transmission of the television signal all over the world.

It is worth mentioning the technical difficulty of the undertaking, taking into consideration the extensive use of wireless devices (portable radios, wireless microphones, microwave links, wireless cameras, satellite links etc) concentrated within restricted areas (Olympic facilities). This fact increases the possibility of interferences. It is indicatively mentioned that during the opening ceremony, thousands of wireless devices will be operating in the Olympic Stadium, in hundreds of different frequencies, while at the same time, the television signal will be directly transmitted all over the world.

EETT, in order to achieve the aforementioned goal, proceeded to the following actions based on the Business Plan drafted in 2002:

- EETT drafted the Monitoring Guide, which defines in detail the spectrum's legal use monitoring and interference problems management procedures, as well as the responsibilities of each involved body.
- Drafted the Organisation Guide for the implementation of the aforementioned procedures, which includes the organisational structure and staffing of EETT's units, the time schedule and location planning of monitoring units in the Olympic facilities, the organisation of support operations and the detailed schedule of its implementation.
- Initiated the personnel recruitment procedure.



- Continued the actions for the procurement, installation and operation of the National Spectrum Management and Monitoring System (NSMMS) and at the same time started the training of EETT employees on the use of the particular equipment.

EETT was present in all Test Events, which took place during the year. During these events, EETT's representatives familiarise themselves with the facilities and procedures of Olympic events, applied the Business Plan's organisation principles and mainly monitored uninterruptedly the spectrum usage.

EETT also informed Private Mobile Radio (PMR) Network users on their rights and obligations according to the licensing framework in force and performed spectrum occupation measurements in areas where Olympic events will take place (Maroussi, Spata, Marathonas, Agios Kosmas, Lofos Filopapou, Profitis Ilias, Piraeus). In cases where illegal users were traced, the procedure provided by the legislation was followed (confiscation of equipment, summoning to Hearings and imposition of fines).

#### 5.4. Planning for the Use of Radio Equipment

During the Olympic Games, a large number of various radio equipment categories is expected to be imported and used in Greece.

EETT, in the framework of the Business Plan, drafted for the provision of a safe and reliable radio communications environment, has designed in collaboration with the ATHOC, procedures for the effective control of radio equipment. This control will exclude from the Olympic facilities any equipment that does not comply with the technical specifications. Specifically, the following will take place:

- Recording of radio equipment that will be used in the Olympic facilities, through the process of licensing.
- Conduction of sample technical tests in the Radio Equipment Control Center, which will operate for this purpose before and during the Olympic and Paralympic Games.
- Marking of the equipment so that its entrance and use in the Olympic facilities will be allowed.

Specifically, the radio equipment categories that are expected to be used are:

- Wireless cameras.
- Fixed links equipment.
- Fixed satellite links equipment.
- In ear monitoring devices.
- Translation services equipment.
- Portable radios with or without base stations.
- Mobile links equipment.
- Satellite News Gathering (SNG).
- Telemetry and telecommand equipment.
- Wireless microphones.
- Wireless Local Area Networks (W-LAN).
- Public mobile services terminal equipment (TETRA, paging, mobile).

The majority of devices is expected to be portable radios and portable microphones.

#### 5.5. Cooperation with Other Bodies

The principal bodies with which EETT closely collaborated during the year, were the following:

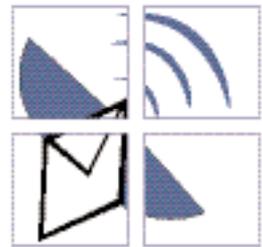
- The ATHOC: Collaboration on a daily basis with the ATHOC Technology Department, for the definition of procedures to be followed, responsibilities assignment and examination of ATHOC and accredited users requests. It is noted that the ATHOC has increased needs in radio frequencies, mostly concerning the opening and closing ceremonies of the Olympic Games.
- The International Olympic Committee (IOC): EETT

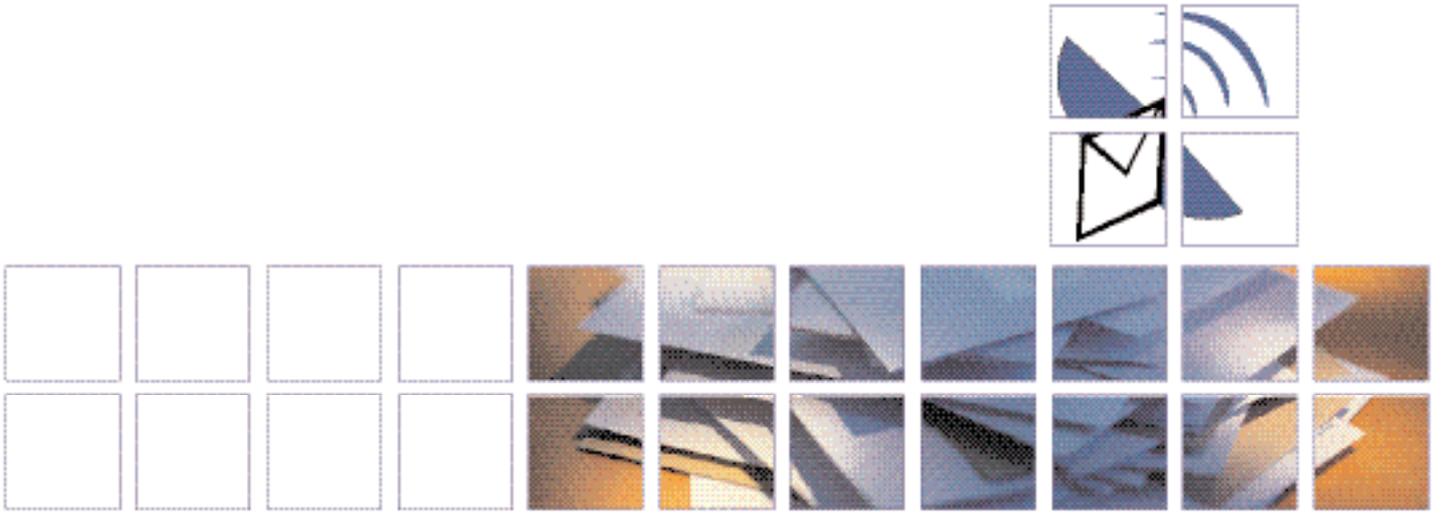


participated in regular monthly meetings with the IOC, in the framework of the Technology Monthly Project Review, which was organised by ATHOC. EETT presented the work progress and the implementation of its Business Plan for the provision of a safe and reliable radio communications environment.

- ▶ The Olympic Games Security Division (OGSD): EETT conducted a series of meetings with representatives by the OGSD and other Security Bodies, concerning the satisfaction of their requests on the provision of radio frequencies for the needs of the Games, as well as cooperation issues on an operational level.
- ▶ The Olympic Games Radio Spectrum Group: EETT continued in 2003 its active participation in the specific Group, which also included representatives of the ATHOC, the Ministry of Transportation and Communications (MTC), the OGSD, the Ministry of Press and Mass Media, the Athens Olympic Broadcasting (AOB), the National Radio – Television Council (NRTC) and the principal radio frequency spectrum users in Greece, such as the Armed Forces, the Civil Aviation Authority (CAA), the Hellenic Radio and Television S.A. (ERT) and OTE. The Group's main goal is to solve radio spectrum availability problems for the coverage of needs during the Games, as well as to resolve issues of organisation and coordination.
- ▶ Bodies with increased needs in radio frequencies: Meetings with the main users of radio spectrum during the Games, were conducted, such as the AOB, the National Broadcasting Corporation (NBC), the European Broadcasters Union (EBU), the Japan Consortium (JC) etc. During these meetings, EETT provided information on the licensing status and the

technical characteristics that their applications must fulfill. At the same time, Consultations were conducted concerning the needs of providers in radio frequencies and the optimum ways to meet these needs.





**POSTAL SERVICES SECTOR**



## 6. Postal Services Sector

During 2003, EETT's interventions in the postal services sector displayed a regulatory and at the same time supervisory character. In this context, EETT's regulatory work was completed with the issuance of Regulations that constitute tools for the promotion of gradual and controlled liberalisation of the market and the protection of consumers.

In the following sections we present EETT's actions concerning the supervision of the Universal Service Provider (USP) and the Courier Services market, as well as the adoption of measures for the improvement of provided services.

### 6.1. Promotion of Gradual and Controlled Liberalisation

#### 6.1.1. Completion of an Up to Date Regulatory Framework

##### 6.1.1.1. Market Liberalisation

The model of controlled and gradual liberalisation of the postal market, which is implemented in Greece, as well as in other member-states of the European Union (EU), ensures the smooth transition from a market with monopolistic characteristics to a fully liberalised market. Specifically, the provision of Universal Service (US) is ensured for all citizens, irrespective of the additional benefits that result from competition.

In this context, in 2003, the Ministry of Transportation

and Communications (MTC) passed Law 3185, which replaced the, until that time, in force Law 2668/ 1998<sup>58</sup> in harmonisation with Directive 2002/39/EC. The Directive aims at the full liberalisation of the Postal Market by 2009, with interim stages set for 2003 and 2006. One of the most critical provisions of the new Directive is the restriction of the exclusive USP rights, regarding the collection, sorting, transport and delivery of domestic mail, incoming and outgoing cross-border mail, as well as the advertising mail. It is noted that in Greece, the Hellenic Post (ELTA)<sup>59</sup> has been designated as USP.

In 2003, based on the new Law, the weight and price limits of the aforementioned services that remained as USP's exclusive right, were formed to 100 grams for items whose price is less than three times the price of a postal item of the first weight category (20 grams) of the First Priority mail.

##### 6.1.1.2. Regulation on Granting General Authorisations

EETT, in November 2003 issued a Regulation on General Authorisations<sup>60</sup>, which replaced the Ministerial Decision (MD) 79810/1999<sup>61</sup>. For the first time the Courier Services were distinguished from those of the US. It was clarified that Courier Services concern postal items of a special urgent transportation, have particular handling, postal item routing and delivery time characteristics, which are monitored through the Postal Items Special -Track and Trace-System (PISTTS).

<sup>58</sup> GG Issue 282/A/18-12-1999.

<sup>59</sup> Article 19 of L 2668/1998, GG Issue 282/A/18-12-1998, as amended by L 3185/2003, GG Issue 229/A/26-09-2003.

<sup>60</sup> EETT Decision 296/93/2003, GG Issue 1682/B/14-11-2003.

<sup>61</sup> GG Issue 437/B/23-04-1999.



In particular, the Regulation defines:

- The categories of General Authorisations.
- The conditions for the provision of postal services in the liberalised sector of the postal market.

The most important innovations of the Regulation are the following:

- Replacement of the Application for Licensing, by a Statement for the Provision of Postal Services from the postal undertakings, as provided by Law 3185/2003, as well as simplification of the procedure and time reduction of granting a General Authorisation to undertakings.
- Definition of concepts and additional data necessary for the determination of the Courier Services market.
- Definition of the postal undertaking's Network. Promotion of interconnection of businesses integrated in the licensed undertaking's Network, as well as, of information exchange for the dispatches among the collaborating licensed undertakings and their Networks.
- Distinction of General Authorisations into the following three categories, based on the number of sorting centers the undertaking has and the range of the geographical area it covers.
  - **Local General Authorisation:** The undertaking has one postal items sorting center and states one or more geographical areas (municipalities) where it provides its services.
  - **Regional General Authorisation:** The undertaking has more than one postal items sorting centers and states one or more geographical areas (municipalities) that its Network provides services.
  - **National General Authorisation:** The

undertaking has all the characteristics of an undertaking with a Regional General Authorisation and has at least one Courier selling point in every prefecture in the country.

All undertakings with a Local, Regional or National Authorisation, in order to provide integrated services to the consumers, can collaborate with other licensed undertakings for the coverage of areas that they are not in a position to cover themselves. To this end, collaboration means are specified, based mostly on the communication of their information systems (PISTTS).

In every case of a General Authorisation, responsible for the provision of the service is the undertaking that accepts the relevant order from the consumer.

- Institution of the minimum required PISTTS specifications, for the monitoring and tracing of postal items.
- Definition of the minimum data that must be included in the Charter of Obligations to the Consumer (COC), in the Accompanying Courier Note (ACN) and in the Individual Agreement.

The undertakings are obliged to adapt their systems and their operation to the new regulatory framework, until the 13<sup>th</sup> of May 2004.

The Regulation will contribute to the establishment of a more effective and flexible framework of postal undertakings operation and to the improvement of the quality of services that are not part of the US and are defined as other postal services<sup>62</sup>. In this way, the unimpeded operation of competition in the market will be ensured, as well as the development and the interconnection of postal undertakings Networks.

<sup>62</sup> Article 1 of L. 2668/1998, GG Issue 282/A/18-12-1998.



### 6.1.1.3. Regulation on Granting Individual Licences

In the US provision sector, an Individual Licence is required for the operation of an undertaking –in areas other than the USP's exclusive rights. The responsibility for the provision of Individual Licences was assigned by Law 3185/2003 to EETT. In this framework, EETT issued the Regulation on Individual Licences<sup>63</sup>, which set the procedure and conditions of granting, renewal, amendment, respite and revocation of Individual Licences for the provision of postal services, as well as the calculation and payment method of the relevant annual fees.

The Licence is granted following a relevant application from the interested undertaking and concerns the handling of:

- a) Postal items weighing from 100 grams to 2kg.
- b) Newspapers, books, catalogues and magazines, weighing up to 2kg.
- c) Parcels that include commodities, with or without commercial value, weighing up to 20kg.

In relation to the former Regulatory Framework, the following innovations are introduced to the operation and development of undertakings that operate or wish to operate in the provision of non-exclusive USP services:

- Definition and establishment of the postal Network concept, its mode of operation, as well as its terms of interconnection with other postal networks.
- Definition of a more effective and flexible licensing framework, providing to EETT the possibility to evaluate the postal undertaking's ability to provide quality and reliable services.

Furthermore, the new Regulation includes in detail the granting conditions of Licences, the obligations of

postal undertakings before consumers and the pricing principles of provided postal services.

### 6.1.1.4. Regulation on the Cost Accounting System of the Universal Service Provider

EETT, according to the authorisation of Law 3185/2003, issued a Regulation<sup>64</sup> on the cost calculation of the US. Specifically the Regulation:

- Describes in detail the methodology for calculating the US cost.
- Defines the efficient cost and establishes an assessment method.
- Specifies the cost on which the pricing of US services will be based.

As efficient cost is defined the under condition lower cost that is required for the provision of a service by the USP, with specific quality characteristics<sup>65</sup>. For regulatory purposes and in order to assess if the USP's cost is efficient, EETT calculates if the percent change of the produced volume of US, subtracting the percent annual change of the corresponding operating expenses required between the period under examination and the former one, in real prices, is a positive number. In case it is not, EETT judges if a cost adaptation is necessary for the aforementioned period, so that US tariffs are based on the efficient cost.

By the above methodology, which compares the undertaking's progress in relation to the previous years, the assessment of the undertaking's effective management is achieved, without EETT's intervention as a regulatory authority, in the choices and decisions of the USP's Management. The purpose of establishing the aforementioned methodology is the provision of quality

<sup>63</sup> EETT Decision 300/44/2003, GG Issue 1906/B/22-12-2003.

<sup>64</sup> EETT Decision 301/28/2003, GG Issue 1993/B/31-12-2003.

<sup>65</sup> According to what is provided in MD 79293/2000, GG Issue 1588/B/29-12-2000.



services to consumers, in prices that correspond to a productive operation of the USP.

#### **6.1.1.5. Regulation on the Pricing of Universal Services**

The MTC is authorised, according to Law 3185/2003, to issue a Regulation on the pricing rules of US services, so that they are cost harmonised, uniform for the whole country and in affordable prices. To this end, EETT prepared for the MTC a draft of the aforementioned Regulation and its issuance is expected in the forthcoming period.

#### **6.1.1.6. Drafting of Regulations on the Monitoring and Controlling Role of EETT**

According to Law 3185/2003, the drafting of three new Regulations is provided, which concern EETT's operation in relation to the problems that arise between consumers and postal undertakings. The MTC is competent for the issuance of these particular Regulations, following EETT's opinion.

The three Regulations are the following:

- Regulation on Hearings for issues of postal services provision, as well as definition of the type and the procedure for investigations or other control procedures, in order to ascertain any violations of the legislation in force.
- Regulation on the investigation of consumer complaints and on EETT's resolution of disputes arising between the Public Administration and postal undertakings, among undertakings, as well as between the latter and the consumers.
- Regulation on the control of safeguarding the USP's exclusive rights and on the definition of the relevant procedure.

EETT submitted to the MTC, drafts for all three aforementioned Regulations. Their issuance, which is expected during 2004, will contribute to EETT's more

effective operation, especially in what concerns market control and monitoring, as well as the resolution of consumer issues.

### **6.1.2. Market Monitoring and Control**

#### **Data Collection System**

In 2003, EETT continued the quantitative and qualitative data collection procedure for the Courier undertakings, based on a questionnaire, aiming to monitor and analyse the market in question.

The aforementioned data will contribute to:

- The relevant analysis of the Courier Services market, in terms of demand and supply of services.
- The assessment of the competition level.
- The recording of structural weaknesses present in the market and the adoption of measures by EETT in order to resolve them.
- The estimate of the future evolution of the Courier Services market.

The results from the data collection procedure are published in EETT's website.

#### **Monitoring and Control of the Courier Services Sector**

In the framework of its monitoring and control role, in 2003, EETT proceeded to on the spot controls and information collection from the undertakings, as well as from Public Authorities. Specifically, EETT conducted controls in the following four large undertakings operating in the Courier Services sector, which cover approximately 70% of the handled volume of items in the relevant market:

- ACS S.A.
- DHL INTERNATIONAL (HELLAS) S.A.
- ELTA COURIER S.A.
- SPEEDEX – COURIER S.A.



Furthermore, EETT conducted sample controls in undertakings that belong to the Network of the above undertakings. The principal aim of these controls was to ascertain whether or not the undertakings comply with the terms of their Authorisation and any infringement of the USP's exclusive rights. The control results were positive in what concerns the upholding of the above.

EETT, taking into consideration the conclusions that resulted, proceeded to the design of a more effective control system for the postal undertakings, which is expected to be completed in the beginning of 2004. EETT, upon completion of the aforementioned control system and upon issuance of the aforementioned Regulations on its monitoring and control role, plans the initiation of systematic controls in postal undertakings, so that the upholding of the Regulation on General Authorisations can be ascertained, with the aim to provide competitive services to consumers.

Furthermore, in 2003, in the context of complaints' management, EETT contributed to:

- The immediate resolution of problems, wherever possible.
- The activation of the Dispute Resolution Committee of undertakings and the compensation of the damaged user.
- The improvement of the service quality by the USP, in problematic areas.

In cases where the resolution of complaints was not possible –through the Dispute Resolution Committee of undertakings- EETT proceeded to the holding of Hearings with the participation of all involved parties. Following

that, the relevant administrative penalties were imposed wherever a violation was ascertained.

### Statistical Data on Market Monitoring during 2000 - 2003

During the four-year period 2000 - 2003, postal undertakings were summoned to Hearings before EETT, for more than 100 cases, which concerned the cases presented in Table 18.

From the aforementioned cases, violations were ascertained and penalties were imposed to 58 cases in total, from which 22 (38% of the total Hearings cases) concerned a Recommendation or a Warning and 36 (62% of the total Hearings cases) concerned a fine.

In total, during the four-year period 2000 - 2003, EETT imposed fines amounting to 1,274,249 euros, from which:

- 279,472 euros, were imposed on undertakings operating without a General Authorisation or an Individual Licence.
- 104,892 euros, were imposed on licensed Courier undertakings for the inadequate provision of services in violation of the legislation in force.
- 699,124 euros, were imposed due to inadequate provision or low quality services by the USP.
- 190,761 euros were imposed due to violation of the USP's exclusive rights.

The USP, during the whole four-year period, was deliberately controlled for the quality of services provided, the speed of mail handling and for the reliability of its services. Given that the ascertained quality was not

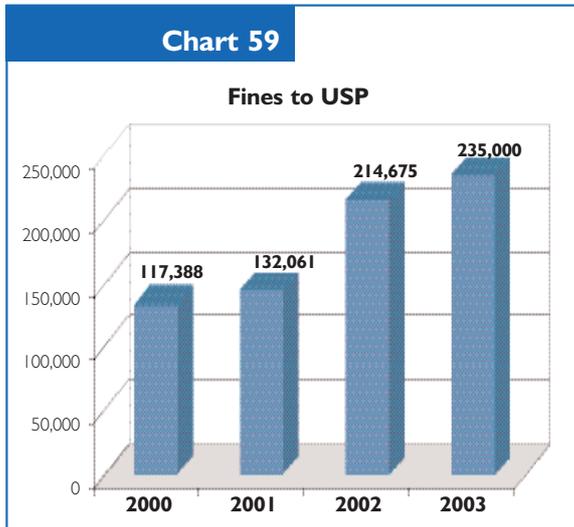
**Table 18**

**Cases for which Postal Undertakings were summoned to Hearings by EETT (2002 - 2003)**

| Percentage | Reason   |
|------------|--|
| 55%        | Provision of postal services without General Authorisation or Individual Licence |
| 23%        | Inadequate provision of postal services by the USP and the Courier undertakings  |
| 12%        | Infringement of USP's exclusive rights   |
| 10%        | Other issues of non-implementation of the postal services Regulatory Framework   |



compliant to the MD 79293/2000 as well as to the EU quality specifications, the fines presented in Chart 59 were imposed per year.



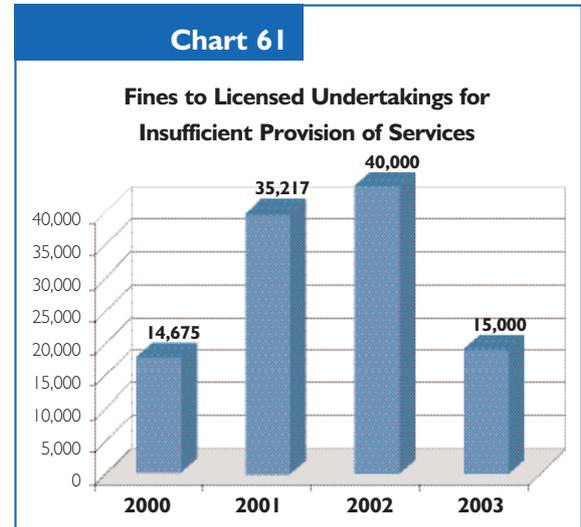
Source: EETT

Concerning the Courier Services market, EETT proceeded to actions for the tracking of non-licensed services and the adoption of measures, in the framework of which EETT imposed the fines presented in Chart 60.



Source: EETT

Furthermore, EETT imposed fines to Courier undertakings for the inadequate provision of services or violation of the legislation in force (see Chart 61).



Source: EETT

### Administrative Penalties in Postal Undertakings during the year 2003

During the year 2003, 32 Hearing procedures in total were held before EETT. From those, 25 cases resulted in the discharge of undertakings, while penalties (Fine or Recommendation) were imposed on the following cases.



**Table 19**

| <b>Collective Table of Fines</b>  |  |                     |
|-----------------------------------|--|---------------------|
| <b>Undertaking</b>                | <b>Reason</b>  | <b>Fine (euros)</b> |
| ELTA                              | Inadequate provision of US postal services                                       | 15,000              |
| ELTA                              | Provision of US low quality postal services                                      | 220,000             |
| ELTA COURIER S.A.                 | Inadequate provision of postal services  | 15,000              |
| FLASH RUNNER COURIER SERVICES LTD | Provision of postal services without General Authorisation or Individual Licence | 30,000              |

**Table 20**

| <b>Collective Table of Recommendations</b> |  |
|--|--|
| <b>Undertaking</b>                         | <b>Reason</b>  |
| EXECUTIVE MOTO                             | Provision of postal services without General Authorisation or Individual Licence       |
| GENIKI POSTAL SERVICES S.A.                | Adoption of measures from the undertaking to avoid violation of USP's exclusive rights |
| ELTA                                       | Inadequate provision of postal services  |

## 6.2. Universal Service Quality Measurement

The MD 79293/2000<sup>66</sup> defines the quality specifications and terms, under which the US must be provided to citizens. The specifications concern the specific handling time and the reliability –also measured in terms of handling time- for the delivery of the First Priority Domestic and International Mail. The quality control regarding US provision is EETT's responsibility and refers precisely to the measurement of the handling time (speed and reliability) of the aforementioned mail.

### 6.2.1. Universal Service Quality Standards

The MD 79293/2000, defines, inter alia, the percentages of delivery within one and three days (D+1 and D+3<sup>67</sup>) of posting for the First Priority Domestic Mail and within three and five days (D+3

and D+5) of posting for the First Priority International Mail.

The quality specifications (Domestic Mail delivery percentages) for 2003, based on which the US must be provided in the Greek state, had been defined for 2003 to 82% within one day and to 93% within three days of posting, for the First Priority Domestic Mail. Respectively, for the International Mail, the MD had defined quality specifications (delivery percentages) which varied from 72% to 97% depending on the EU country and the delivery time (D+3, D+5). It is noted that the Directive 1997/67/EC provides for the International Mail an 85% delivery within three days (D+3) and a 97% within five days, for both the Incoming and the Outgoing mail.

EETT is responsible for the announcement of the US' quality specifications, for the safeguarding of the US

<sup>66</sup> GG Issue 1588/B/29-12-2000.

<sup>67</sup> Where D=1 posting day.

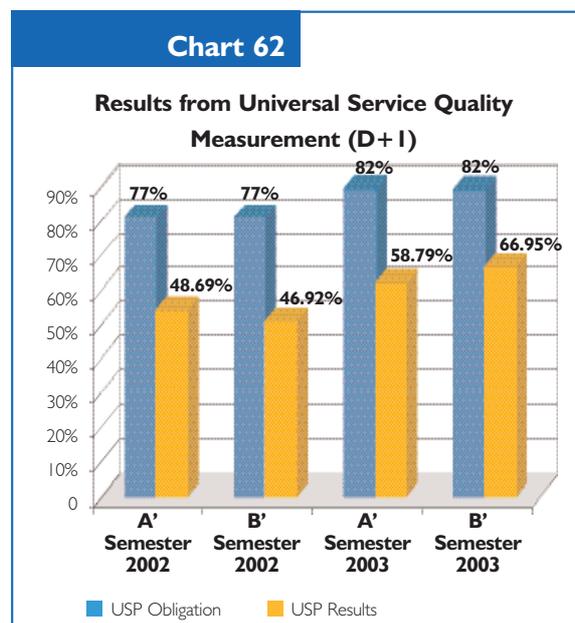


objective quality control and the publication of its results.

### 6.2.2. Universal Service Quality Measurement Results

EETT assigned to an independent body the performance of measurements for the Domestic Mail quality control, according to a system designed by EETT and which guarantees a 95% reliability, as provided by the MD 79293/2000.

The results of the measurements per semester for 2003 and 2002, in comparison to the USP's obligations, are depicted in Table 21 (see also Charts 62 and 63).

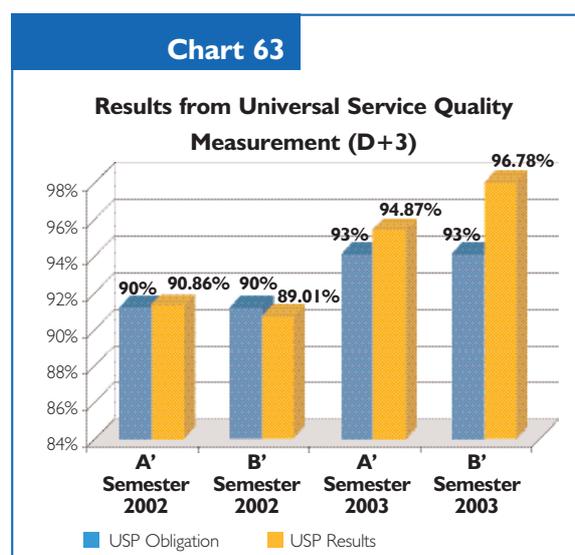


Source: EETT

|     | A  |      | B                |                  |                  |                  | C  |                  |                  |                  |
|-----|--|------|------------------|------------------|------------------|------------------|--|------------------|------------------|------------------|
|     | Obligation of USP based on MD 79293/2000 |      | USP Results      |                  |                  |                  | Average Delivery Duration (Working Days) |                  |                  |                  |
|     | 2002                                     | 2003 | A' Semester 2002 | B' Semester 2002 | A' Semester 2003 | B' Semester 2003 | A' Semester 2002                         | B' Semester 2002 | A' Semester 2003 | B' Semester 2003 |
| D+1 | 77%                                      | 82%  | 48.69%           | 46.92%           | 58.79%           | 66.95%           | 1.91                                     | 1.98             | 1.61             | 1.44             |
| D+3 | 90%                                      | 93%  | 90.86%           | 89.01%           | 94.87%           | 96.78%           |  |                  |                  |                  |

The above mentioned percentages and the average delivery duration concern the whole country and apply to First Priority Mail deposited in the USP's access points (letter boxes etc), until the 12<sup>th</sup> meridian hour of a working day.

Concerning delivery within one day (in the following working day), from the measurements' results we can deduce that even though the US quality is still inferior to the specifications set by the Greek and European legislation, an important improvement is observed in comparison to the former year 2002. Furthermore, from Table 21, we can deduce that the USP, in what



Source: EETT



concerns the delivery percentages within three days, has corresponded to the specifications.

For International Mail, according to the aforementioned MD, the data issued by the International Post Corporation (IPC) is used. According to the available results on the quality measurements of IPC on the First Priority International Mail, for the whole 2003, the USP corresponded satisfactory to the quality specifications for Outgoing Mail but lagged behind, in a smaller degree though, in the fulfillment of quality specifications for Incoming Mail.

### **6.3. Introduction of Quality Rules for Courier Services**

In 2003, EETT proceeded to the definition of the minimum characteristics that must be possessed by PISTTS, the COC of every undertaking, the ACN and the Individual Agreement (see detailed report in Section 2.3.).

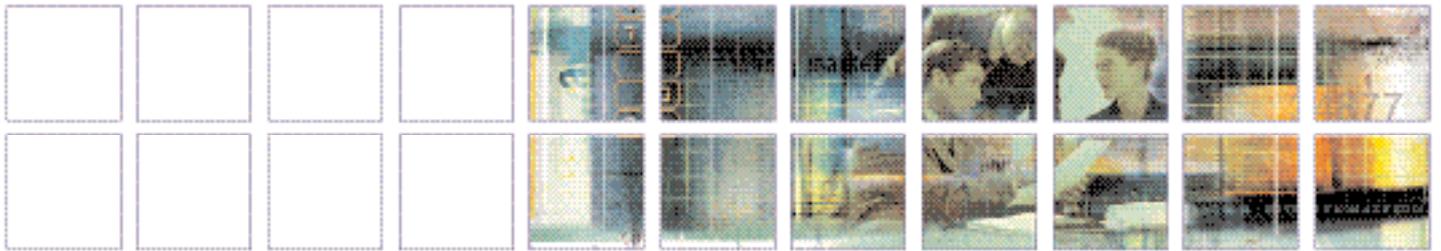
In what concerns the PISTTS, it is a system that ensures the tracking of items during all handling stages, the interconnection of undertakings included in the licensed undertaking's Network, as well as the exchange of information between the collaborating licensed undertakings and their respective Networks.

EETT proceeded to the definition of the PISTTS' minimum characteristics, following evaluation of the results of a relevant study conducted during 2002, which aimed at the collection of data concerning the existing postal undertakings systems for the tracking and tracing of postal items.

The PISTTS's basic characteristics are the following:

- ▶ It covers all the Courier Services provided.
- ▶ It ensures the reliability of information which the undertaking manages and provides to consumers.
- ▶ Allows the registration and the electronic management of the necessary information on handled items. The information is maintained for a period of at least six months.
- ▶ It provides the possibility of exchange of the necessary information between collaborating undertakings, for the tracking and tracing of postal items.

EETT included all the aforementioned elements in the issued Regulation on General Authorisations, aiming to improve the quality of provided services and to safeguard consumers' rights.



**THE NATIONAL TELECOMMUNICATIONS AND POST COMMISSION (EETT)**



## 7. The National Telecommunications and Post Commission (EETT)

In this Chapter, we present the actions that concern EETT's internal organisational structure and framework, as well as the support mechanisms for EETT's effective operation. Furthermore, we present the projects that have been integrated in the Operational Plan "Information Society" (OP-IS) and their implementation course, as well as EETT's Business Plan (BP), which summarises all its strategic goals and actions. Another important aspect was also EETT's active participation in international committees and bodies, for the monitoring of developments and the formation of common positions by all National Regulatory Authorities (NRAs). Finally, we mention EETT's information systems, which facilitate and render more effective EETT's daily work and contribute to the improvement of quality in the services provided.

### 7.1. Structure and Framework of EETT Internal Organisation

#### 7.1.1. EETT Organisational Structure

Pursuant to Law 2867/2000, EETT is established as an Independent Administrative Authority enjoying administrative and financial independence. EETT's main responsibilities are the supervision and regulation of both the telecommunications market and the postal services market in Greece.

On one hand, EETT's goal is the smooth operation of both markets in a competitive environment and on the other hand, the protection and safeguarding of consumer rights.

EETT is composed of:

- ▶ The nine-member Commission, which consists of the President, the Vice President of the Telecommunications Sector, the Vice President of the Postal Services Sector and the Members. The Commission is selected by the Conference of the Presidents of the Parliament and appointed by virtue of a Decision of the Minister of Transportation and Communications.
- ▶ The Experts.
- ▶ The Permanent Personnel.

The Experts and the Permanent Personnel are presented in detail in subsection 7.1.2.

#### 7.1.1.1. Implementation of Organisational Chart

The implementation of Presidential Decree (PD) 387/2002 on the internal structure of EETT and the qualifications and selection method for the Directors was EETT's principal aim during 2003. This PD has helped in the design of an organisational structure that can support the effective implementation of EETT's work. The Organisational Chart is presented in Figure 6 (see page 138).

Specifically, in June 2003, EETT filled the majority of Directors' positions, proceeded to the entrusting of authorisations and the staffing of Directorates and Departments with the existing personnel. Furthermore, in November 2003, the Directors positions that had not been filled were announced for filling for a second time, and the procedure is expected to be completed in the beginning of 2004.

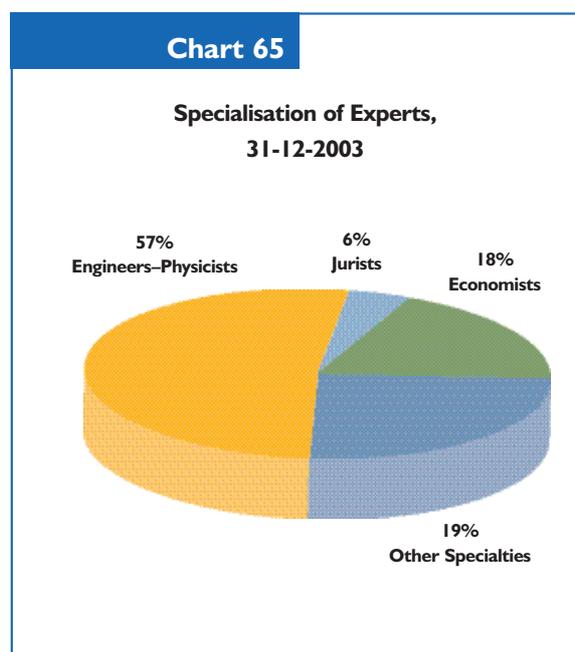
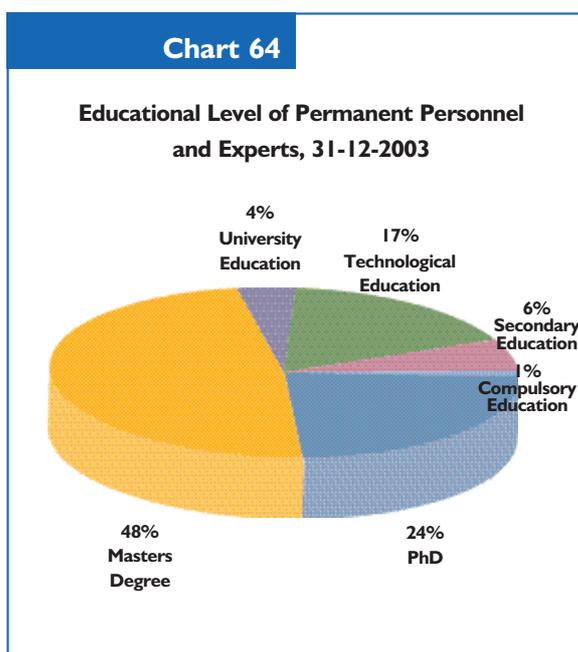


### 7.1.2. Staffing and Training

In 2003, EETT's staffing with suitably qualified personnel, capable of responding to its demanding work, was continued. Specifically, the number of employees in the end of 2003 amounted to 129, from 110 in the end of 2002. 109 of the aforementioned employees were employed on a full time basis and 20 as external associates

-members of Working Groups. The evolution of EETT's human resources and their educational level are presented in Table 22 and in Chart 64 respectively.

On the 31<sup>st</sup> of December 2003, Experts amounted to 67 scientists, in their majority engineers-physicists and economists. Their breakdown by specialisation is presented in Chart 65.



**Table 22**

**Number of Employees per Category**

|  | 31-12-98  | 31-12-99  | 31-12-00  | 31-12-01  | 31-12-02   | 31-12-03   |
|--|-----------|-----------|-----------|-----------|------------|------------|
| Special Experts  | -         | -         | 26        | 37        | 56         | 67         |
| Permanent Personnel of University Education              | -         | -         | -         | 3         | 4          | 4          |
| Permanent Personnel of Higher Technological Education    | -         | -         | 6         | 6         | 17         | 25         |
| Permanent Personnel of Secondary Education               | -         | -         | 1         | 4         | 6          | 6          |
| Permanent Personnel of Compulsory Education              | -         | -         | -         | -         | -          | 1          |
| Personnel temporarily available from other Organisations | 1         | 1         | 2         | 6         | 6          | 4          |
| Available  | 12        | 13        | 1         | 2         | 2          | 2          |
| Working Group Members*                                   | 4         | 4         | 12        | 20        | 19         | 10         |
| <b>TOTAL</b>   | <b>17</b> | <b>18</b> | <b>48</b> | <b>78</b> | <b>110</b> | <b>129</b> |

\* Associates participating in Working Groups.



It is noted that in the beginning of the next year, a significant increase of EETT's human resources is expected, especially of its Permanent Personnel, following the filling of positions. EETT's goal is to conclude the procedures of its staffing, pursuant to PD 387/2002, by the end of 2004.

Furthermore, in 2003 EETT, recognising the importance of continuous training, conducted in collaboration with the National Public Administration Center, a training programme with the theme "Training of Directors", and in collaboration with a specialised company, seminars concerning issues of effective telephone communication.

### 7.1.3. Support Mechanisms

#### Electronic Protocol System

EETT's ever-increasing activities led to the need for the creation of a new advanced electronic system for the management of documents, which will ensure faster registration, filing, handling and monitoring of the documents' management. To this end, in 2002, EETT assigned to an external consultant, the design of an Electronic Protocol system, adapted to its needs, which was put into operation in 2003.

In detail, the new system responds to the following goals:

- The control of the receipt and dispatch of documents.
- The reduction of their handling and management time.
- The systemised filing of documents and their easy recovery.

#### New Payroll System

By a Joint Ministerial Decision<sup>68</sup> (JMD) the new EETT Payroll System, has been implemented since April 2003 completing the existing one.

The main changes are the linkage of wages with employees' efficiency and effectiveness and the introduction of a system for the payment of overtime and exemptibles. Furthermore, it defines the monthly wages of Directors and introduces a special monthly compensation for employees available from other Organisations and transferred employees.

#### New Payroll and Human Resources Management System

The limited abilities of the old payroll system, led to the procurement, installation and implementation, since the 1<sup>st</sup> of January 2003, of a new, more advanced software, which includes an integrated management system of EETT's human resources.

#### Design of Templates for Contracts and Invitations to Tender

The need for EETT's smooth operation in what concerns the agreement conclusion sector, led to the necessary drafting of the Implementation Guide of the Regulation on the Agreements Conclusion on Procurement, Services and Studies by EETT, as well as the drafting of Template Invitations to Tender, Compilation of Obligations, Contracts and Guarantee Letters. This project, which was assigned by EETT to an external consultant, was completed in 2003. The Guide and the aforementioned Templates were immediately implemented, constituting an important tool for the conclusion of agreements according to the

<sup>68</sup> JMD 2/2981/0022, GG Issue 490/B/22-04-2003.



community and national provisions in force. From the above, a proper procedure of agreements conclusion is ensured.

## 7.2. Information Society

During 2003, EETT continued its active participation in Axis 4 "Communications" of the OP-IS of the 3<sup>rd</sup> Community Support Framework (3<sup>rd</sup> CSF). The OP-IS consists of a series of interventions in various areas of economic and social activities, which aim at the development of the Information Society (IS) in Greece. One of these sectors, concerns Communications.

Since 2001, when EETT completed its Business Plan (BP) for the projects integrated in the OP-IS, EETT has submitted in total 12 projects for integration, consisting of 17 sub-projects. From those, 9 projects have been integrated in Measure 4.1 "Development of mechanisms for the implementation of the institutional framework and the reinforcement of competition" of the OP-IS, and 3 project applications are already under review by the Managing Authority (MA) of the IS. The implementation of all projects integrated in the OP-IS is advancing at an increased rate.

The aforementioned 9 projects consist of 13 sub-projects, from which:

- 6 have been completed and paid in full.
- 6 have been contracted and are in the implementation phase.
- 1 is in the tender process.

Indicatively, until the 31<sup>st</sup> of December 2003:

- EETT submitted Technical Project Forms for inclusion of projects that correspond to 46.3% of the total BP budget.
- The projects included correspond to 45.87% of the total BP budget.

- EETT launched tender procedures for projects that correspond to 39.9% of the total BP budget.
- EETT signed contracts that correspond to 45.97% of the BP budget.
- The payments corresponded to 20.21% of the total BP budget.

More specifically, during 2003, EETT achieved the integration of the following projects:

- Study on the Organisation, Planning and Implementation of Voluntary Accreditation of Certification Service Providers (CSPs) and on other issues pertaining to the Provision of Electronic Signature Certification Services (see subsection 3.1.3.).
- EETT Integrated Information System (IIS) (see subsection 7.6.1.) which consists of the following two sub-projects:
  - IIS specialisation study.
  - IIS implementation.
- Organisation and Implementation Study for the Radio Spectrum Directorate (see subsection 4.5.1.).

Moreover, EETT submitted for inclusion the following projects, the applications for which are currently under review by the MA of IS:

- Technical Form of the Project "National Action Plans for Emergencies in Telecommunications" (see subsection 3.1.2.).
- Amending Technical Form for the project "National Spectrum Management and Monitoring System (NSMMS) - Phase A" (see subsection 4.4.), which concerns the inclusion of an additional unit to the approved one.
- Amending Technical Form for the project "EETT Organisation", which concerns the extension of the included project's agreement.

From the aforementioned projects, the first one is in



tender procedure phase, the second one in implementation phase and the third one has been completed and received by EETT.

### 7.3. EETT Business Plan 2003 - 2005

During 2003, EETT acted in accordance with its Business Plan, developed during the second semester of 2002 and concerned the three-year period of 2003 - 2005.

2003 was the first year EETT implemented this tool, which sets its operational and development framework, defining its policies, the directions and actions that must be implemented in a predefined timeframe. The Business Plan transforms EETT's strategic goals to specific action plans that have been implemented and are still being implemented by Directorates and Departments.

After the implementation of the new organisational chart, EETT revised the former Business Plan, as had been provided when it was finalised in December 2002. This revision was conducted taking into consideration:

- The new conditions that appeared in EETT's internal and external environment during the first semester of the Business Plan implementation. In detail, these changes concerned:
  - The publication of the PD on the Organisation of EETT, its implementation and the organisation of EETT according to a specific structure.
  - The establishment of EETT's first Regional Office in Thessalonica for spectrum issues.
  - The recruitment of personnel.
  - The delay in harmonising the Greek law with the new Regulatory Framework on electronic communications.
  - The conclusion of major and important project agreements (National Relational Database for

Number Portability-NRDNP, Domain Names Registry, OTE's cost control), which set specific timeframes and demands in human resources.

- The introduction of ADSL in the Greek telecommunications market, which set significant demands on EETT's operation in what concerns the control of ADSL implementation.
  - The progress of the project on the Organisation of the Spectrum Management Directorate and the drafting of the relevant Regulations.
  - The conclusion of agreement on the National Spectrum Management and Monitoring System (NSMMS) and the finalisation of the contractual implementation timeframe.
  - The experience from the up to that date operation of the Consumer Service Sector (CSS).
  - The publication of the new law on postal services.
- The experience acquired from the first semester of implementation, in what concerns the estimates in implementation schedules, as well as the estimate for the duration and the man-effort required for the implementation of different projects and the evaluation of issues that arose.
  - The approach and vision of executives who occupied responsibility positions and played an active role in the design of the revised Business Plan.

The years 2003 - 2005 are of significant importance to the evolution of competitiveness of the Greek telecommunications market and EETT's role is crucial for the establishment of competition and the promotion of consumer rights. The significance and the necessity of the successful implementation of the Business Plan lies on the fact that it will ensure to the maximum level the achievement of EETT's goals and the effectiveness of its regulatory role.



## 7.4. International Relations

The dynamic sector of electronic communications is not restricted to the confined limits of a country, but has an international character and is affected by the general developments in the other markets. Thus, for the NRAs for electronic communications, the bilateral, European and international relations are an integral part of their current work.

The importance of international relations for EETT is inextricably linked to its vision to constitute a dynamic European NRA, which will go along with international developments and will adhere to the same principles, laws and practices that apply in the rest of Europe. EETT is not confined to the monitoring of current European developments, but actively participates in the formulation of common positions for the resolution of issues that concern all NRAs in Europe. The participation of its executives in the relevant European groups is the main diffusion method of this knowledge and experience internally, aiming at the more effective exercising of its role to the benefit of the market.

During 2003, EETT continued the collaboration with a large number of NRAs, as well as with European and international organisations on issues of its competence in electronic communications, the radio spectrum and post offices.

### 7.4.1. European Union

#### **New Regulatory Framework**

The new European Regulatory Framework, as a continuation of the former one, which focused on the facilitation of the transition from a market with monopolistic characteristics to a fully liberalised one, aims at the development of the unified electronic communications

market in the European Union (EU) and the safeguarding of the competition's operation in every relevant market of the sector. The milestone date was the 24<sup>th</sup> of July 2003, on which the member-states had the obligation to institute and publish the necessary legislative, regulatory and administrative provisions which would harmonise their national law with all European Directives.

With the new Framework, the role of the NRAs, which undertake the principal responsibility to implement and enforce it, is strengthened. The NRAs are also responsible for the definition and analysis of relevant markets that need to be regulated, the safeguarding of the competition's operation in the aforementioned markets, and the designation of Organisations with Significant Market Power (SMP), on which, if it is deemed necessary, they impose specific obligations for the achievement of the aforementioned goals.

#### **European Committees/ Groups**

In 2003, EETT continued to participate in the proceedings of Committees and Groups of the European Commission, which among other things, consult and assist the Commission in establishing the internal market for electronic communications networks and services. In these, the following are included:

- Communication COMmittee - COCOM.
- Telecommunication Conformity Assessment and Market Surveillance Committee (TCAM) for the implementation of Directive 1999/5/EC.
- ADministrative COoperation Group (ADCO).
- Internet Informal Group (IIG).
- Postal Directive Committee.

Furthermore, EETT participated in the proceedings of a series of Groups that treat the critical issue of Electronic Signature:



- ▶ The Forum of European Supervisory Authorities for Electronic Signatures (FESA).
- ▶ The European Electronic Signature Standardisation Initiative (EESSI).

### **ERG**<sup>69</sup>

2003 was the first year of full operation of the newly founded European Regulators Group (ERG), which was established by a Decision of the European Commission. The Group's goal is to constitute the cohesion link between the NRAs and the European Commission and to assist in the consistent implementation of the new Regulatory Framework in all member-states. EETT responded to the Group's undertakings, participating in all the Plenary Meetings of the Presidents. The results of the Group's work include, among others, the following:

- ▶ A Working Paper for the definition of SMP, ERG(03)09.
- ▶ Adoption of a common position on the implementation procedures of Article 7 of the Framework Directive 2002/21/EC, according to which the NRAs are obliged to notify to the European Commission and to other NRAs, the analysis results for each one of the 18 relevant markets defined by the Commission.
- ▶ Adoption of the "Common Approach" plan<sup>70</sup> to the selection of appropriate remedies imposed by the NRAs to Organisations with SMP, as they are defined in the Commission's Recommendation on relevant markets ERG(03)30.
- ▶ Approval of the Report by the Independent Regulators Group (IRG) on the designation procedures of the Universal Service Provider (USP), ERG (03)38.

### **IRG**

The IRG was founded in 1997 by independent NRAs, aiming mostly at the exchange of experiences and practices on issues that concern the regulation and development of the European telecommunications market. EETT is a member of the Group and actively participates in the proceedings of the President Plenary Meetings and in the individual Working Groups.

During 2003, the IRG published a series of Principles of Implementation and Best Practice (PIBs), focusing on the alignment of the regulatory practices on a European level and on the maintenance of transparency in the activities of the Group.

### **9<sup>th</sup> Report**<sup>71</sup>

The 9<sup>th</sup> Report on the Implementation of the EU's Regulatory Measures Bundle on electronic communications was adopted by the European Commission in November 2003. The Report recognised that the situation in the electronic communications markets seems to have been stabilised and the interest and the trust of undertakings and consumers was renewed. It was stressed that broadband services and mobile telephony will constitute the driving force of development in the time to come. In this context, it was remarkable that in four member-states, 3G Mobile Telephony Services are already provided. At the same time, special mention was made to the Commission's concern on the regulatory condition that prevailed in several member-states, which had not integrated the new Framework into their national legislation.

<sup>69</sup> <http://www.erg.eu.int>.

<sup>70</sup> The final text (Joint Approach on Remedies) is expected to be adopted in April 2004 and will take into consideration the results of the relevant Public Consultation.

<sup>71</sup> [http://europa.eu.int/information\\_society/topics/ecomm/all\\_about/implementation\\_enforcement/annualreports/9threport/text\\_en.htm](http://europa.eu.int/information_society/topics/ecomm/all_about/implementation_enforcement/annualreports/9threport/text_en.htm).



The Report focused mainly on issues that concern the alignment, rather than on a review for each member-state separately, as was the case in previous Reports. EETT sent the relative data, which was included in the Report's 2<sup>nd</sup> Appendix and depicted the regulatory situation in Greece, in the electronic communications sector. Finally, the Report stressed that the Commission will closely monitor the compliance of member-states with their obligations in what concerns, among other things:

- a) The wider responsibilities that have been assigned to the NRAs.
- b) The ease of the NRAs to implement all the regulatory obligations as they are defined in the Framework, when they conclude that there is not adequate competition in a market.
- c) The timely completion of market analyses and the examination of obligations in force by NRAs.
- d) The principles that must be applied for the procedure of transit and frequencies use rights.

#### 7.4.2. EETT Participation in International Bodies

In 2003, EETT continued to participate in international bodies for issues of its competence. An EETT representation from the Spectrum Management Directorate attended the proceedings of the World Radiocommunication Conference (WRC-03) that took place in Geneva, under the auspices of the International Telecommunication Union (ITU)<sup>72</sup>. The goal of the Conferences was the systematic renewal of the database for the allocation and use of radio spectrum and satellite orbits, as this is the forum that sets and updates Radio Regulations (RR).

In what concerns the Conférence Européene des Postes et Télécommunications (CEPT)<sup>73</sup>, EETT participated in the

11<sup>th</sup> Conference of the organisation, where the goal was to assess the developments that affect the regulation of telecommunications issues. The Conference aimed at placing all the regulatory actions of telecommunications issues, wireless or not, in a common perspective.

Finally, EETT executives from the Spectrum Management Directorate attended a series of meetings of relevant Working Groups of the Electronic Communications Committee (ECC)<sup>74</sup>, which aimed at the achievement of consent in European interests concerning electronic communications issues.

#### 7.4.3. International Collaborations

EETT's goal is to collaborate with other Regulatory Authorities, with the purpose of gaining valuable experience and know-how and exchanging views, or acting as a consultant, as for in example in the case of its partners in the area of Southeastern Europe.

In this context, in 2003, EETT welcomed a representation from the Italian Regulatory Authority, in order to be informed on cost issues, exchanged visits with the Romanian Regulatory Authority for issues of mutual interest and welcomed a relevant representation from Cyprus in order to provide information to the latter on issues of Number Portability.

In October 2003, following its own initiative, EETT hosted the 1<sup>st</sup> IRG meeting with Regulatory Authorities from countries of Southeastern Europe.

The meeting's aim was to establish cooperation between the Regulatory Authorities of Bulgaria, Romania and Turkey, and the Regulatory Authorities of

<sup>72</sup> <http://www.itu.int/ITU-R/conferences/wrc/wrc-03/index.asp>.

<sup>73</sup> <http://www.cept.org>

<sup>74</sup> <http://www.ero.dk>



the other European countries. In the meeting, Presidents and experts of Regulatory Authorities participated and the discussions focused on the exchange of views on a series of regulatory issues, such as licensing, Universal Service (US), market analysis and competition issues, broadband services, Interconnection and the costing principles in telecommunications.

Finally, EETT participated in the 1<sup>st</sup> conference organised by the Regulatory Authority of Monte Negro, aiming to record the NRAs responsibilities and problems in the wider Balkan area.

#### 7.4.4. Organisation of IRG/ ERG Summits

On the 19<sup>th</sup> and 20<sup>th</sup> of May 2003, EETT hosted the Plenary Summits of IRG and ERG Presidents. In the proceedings of the Summits, Presidents and representatives from respective NRAs from 28 European countries participated, as well as high ranking executives from the European Commission, among whom the Head of the General Directorate "Information Society".

During the IRG Summit, institutional issues were mainly discussed, which concerned the preparation for the implementation of the new Regulatory Framework in the EU member-states. In what concerns the Summit of the ERG Group, the principal issues discussed were, among others, the definition of obligations on telecommunications providers that have been designated as SMP operators in markets where the competition is not developing sufficiently, the wholesale provision of xDSL services, the accounting separation as well as the costing methods. Furthermore, two European Commission Decisions were also discussed, according

to which the common use of network infrastructure by 3G service providers is allowed, in the United Kingdom and Germany.

In the additional discussions between the Presidents and the European Commission on current issues of regulatory interest, issues such as the use of GSM Gateways, the consequences of traditional PSTN lines substitution, the regulation of wholesale xDSL services provision, the call termination on mobile networks and the interoperability, were discussed.

The European Commission representatives underlined the necessity for timely and effective implementation of the new Regulatory Framework, which aims at ensuring that consumers continue to benefit from various options, the quality of services and the advantageous prices. Furthermore, the crucial role of the NRAs for the implementation of relevant rules in a consistent manner in all member-states, was stressed.

#### 7.5. Conference "Telecommunications: Three Years of Liberalisation"

On the 9<sup>th</sup> of December 2003, upon the occasion of three years since the liberalisation of the Greek telecommunications market, EETT organised a conference entitled "Telecommunications: Three Years of Liberalisation"<sup>75</sup>. The conference's goal was to discuss the evaluation of the liberalisation process, the electronic communications development policies and the perspectives of the telecommunications market, as well as to exchange views under the light of the New Regulatory Framework.

Among the speakers in the conference were the European Commissioner of the IS, Mr. Erkki Liikanen and

<sup>75</sup> More information is available in EETT's website, <http://www.eett.gr>, Publications/ Conferences–Events Sections.



the Minister of Transportation and Communications, Mr. Christos Verelis. The two principal subject areas were: "The Development Policies of Electronic Communications" and "The Electronic Communications Market and its Perspectives". The first subject area focused on the views of the political world on the development of electronic communications, where all political parties with parliamentary presence were represented. The second subject area gave its own mark on the course and perspectives of electronic communications.

## 7.6. Information Systems

### 7.6.1. Expert Study on the Integrated Information System

During 2003, a study was conducted on the design of EETT's Integrated Information System (IIS), which has the following objectives:

- ▶ Quality upgrade of EETT's provided services, which includes:
  - Establishment of a "client-centered" approach.
  - More effective service provided to the citizen.
  - Improvement of information quality.
  - Minimisation of mistakes.
  - Reduction of operational cost.
- ▶ Improvement of productivity/ efficiency of personnel, which includes:
  - Ensuring the effectiveness and speed in the management of daily tasks.
  - More effective management and utilisation of human resources.
  - Upgrading of internal working environment.
- ▶ Upgrading of EETT's information mechanisms and capabilities, which includes:
  - Standardisation, simplification and organisation of the information flow towards the internal environment of

EETT, as well as with external collaborating bodies and persons.

- Availability for valid and reliable information.
- ▶ Strengthening of the perspective for horizontal collaborations between EETT's administration units.

The study resulted in a series of applications that are organised in subsystems, according to Figure 4.

Specifically, the Works and Documents Management subsystem aims at supporting EETT's procedures, with document's registration and management operations, task monitoring and scheduling etc.

The Market Data Management and Business Operations Support subsystems provide the necessary functionality for the support of EETT's main business activities. Specifically, the Market Data Management subsystem concerns the collection, management and exploitation of gathered data and the Business Operations Support subsystem, concerns the licensing, management of scarce resources, radio equipment issues etc.

The Financial Management and Human Resources Management subsystem aims at supporting the Directorate of Financial and Administrative Services.

The Communication Support with the External Environment subsystem provides contact data management operations, mass communication automation, telephone contacts management (i.e. complaints) etc. Thus, automated communication services are provided also for the activities of the other operational areas.

The Services and Communication subsystem through the Internet, includes information publication services and services through the Internet for the electronic submission of applications, notifications, complaints etc.



The study set the specifications for the drafting of an Invitation to Tender Document, aiming to implement the IIS. EETT has begun the tender procedure.

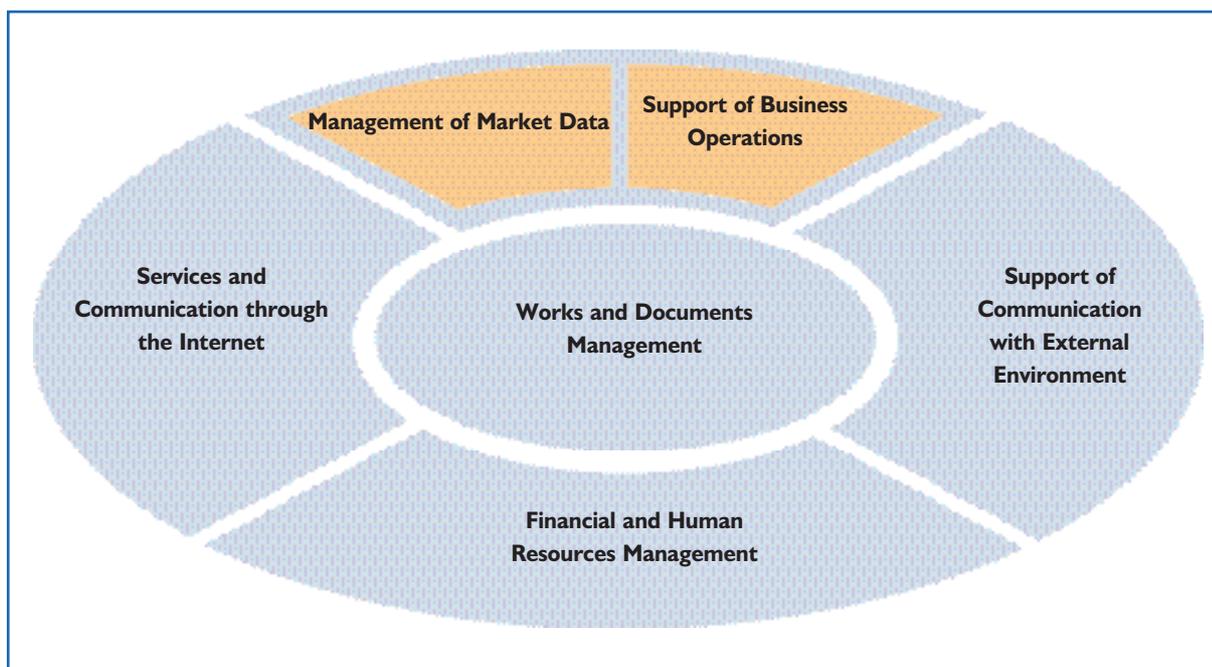
- A special application for the management of radio frequencies complaints, which supports EETT's staff in the organisation and investigation of complaints concerning the radio spectrum, was developed.

### 7.6.2. Development of Support Applications

In order to improve EETT's operation, new software applications were developed internally, and the existing ones were upgraded. Specifically:

- The application for the radio spectrum management was upgraded by the introduction of the automated tariffs calculation, according to EETT's new Regulations.
- The software infrastructure for the support of the integrated radio frequencies and antenna mast constructions licences registry was developed.
- The development of the application for the management of consumer requests/ complaints, which allows their automated monitoring and management, was completed.

**Figure 4: Subsystems of EETT's Integrated Information System**





### 7.6.3. EETT Website

EETT's website (www.eett.gr) was in 2003 once again the key point for the publication of information concerning EETT's undertakings and the telecommunications and postal market in general.

The number of visits to EETT's website exceeded 200,000. Chart 66 presents the frequency of visits to the website in relation to 2002, for the second semester of the year.

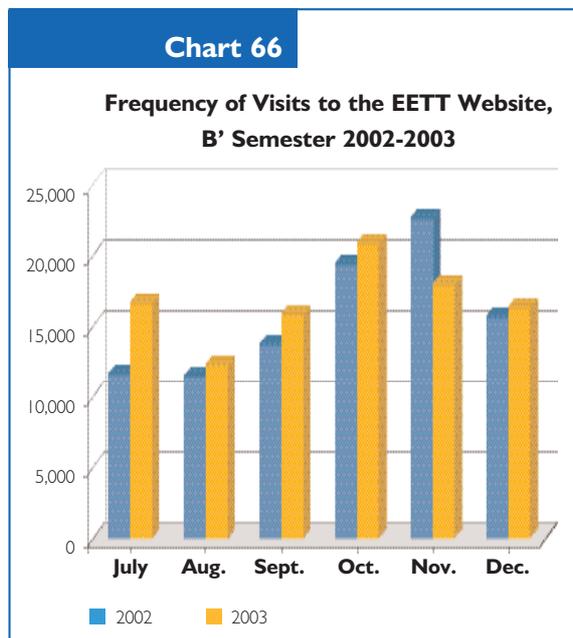
Chart 67 presents the analysis of the aforementioned visits, in terms of subject areas that compose the EETT website. As for the year 2002, most visits were made in the subject areas of Telecommunications and Publications. The number of visits to the subject area of Jobs was also remarkable, as in this area EETT publishes the announcements for personnel recruitment.

Especially for the subject area of Telecommunications, which attracted most of the public's interest, we present in Chart 68, the breakdown of visits to its subsections.

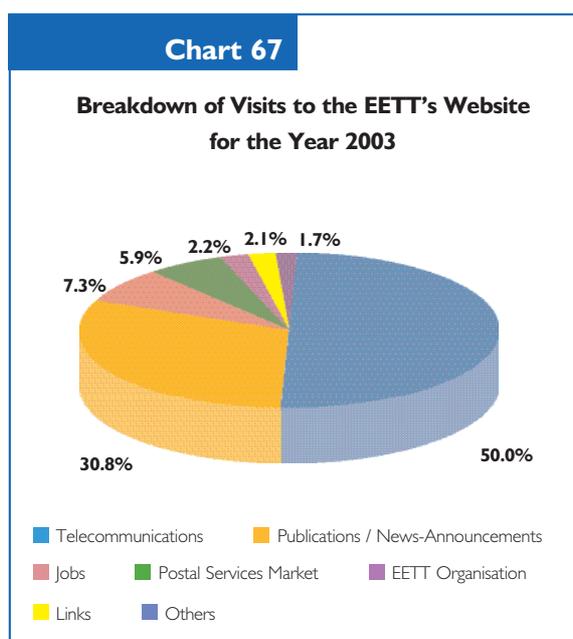
The subsection of Licensing, as in 2002, presented the highest number of visits. Furthermore, great interest was recorded for the subsection of Numbering, even though it presented a decrease in comparison to the former year, due to the familiarisation of the public with the changes in the telephone dialing scheme according to the National Numbering Plan (NNP).

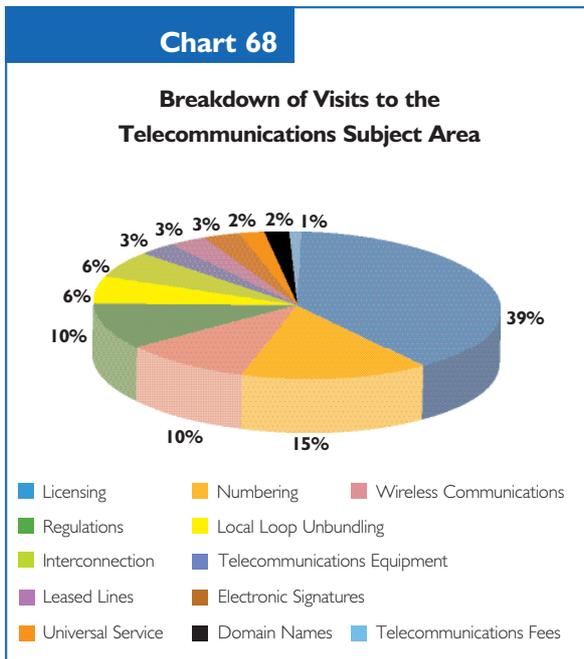
In particular EETT actions supported by the website were the Public Consultations concerning:

- a) The Universal Service Provider (USP) designation criteria and the US cost allocation mechanisms.
- b) The definition of the mobile Call Termination Market.
- c) The project "Definition of Action Plans for



- Emergencies in Telecommunications".
- d) The operation and use of GSM-Gateways.
- e) The Channelisation of Radio frequencies Bands for their use by the Fixed Service.
- f) The Declaration Document for the implementation of EETT's IIS.





use of new tools that will be introduced to EETT's daily operation with the IIS implementation.

The main goals of the intranet is to constitute the main access point, to provide valid information on business issues, to contribute to the optimisation of the decision making procedure and to the strengthening of communication among executives, as well as to constitute a knowledge management tool.

The intranet's content is structured, presented and traced in various ways, based on the principle of easy navigation and use. Its content is presented hierarchically and in groups, based on its notional framework. In addition, the tracing of the content is feasible through a powerful search engine with the capability to process a full (indexed) text, as well as to choose multiple criteria.

**7.6.4. EETT Intranet**

In 2003, EETT's intranet was implemented, which constitutes a handy tool for its personnel. It is based on internet technologies, it offers the possibility to exploit information and at the same time prepares the staff for the

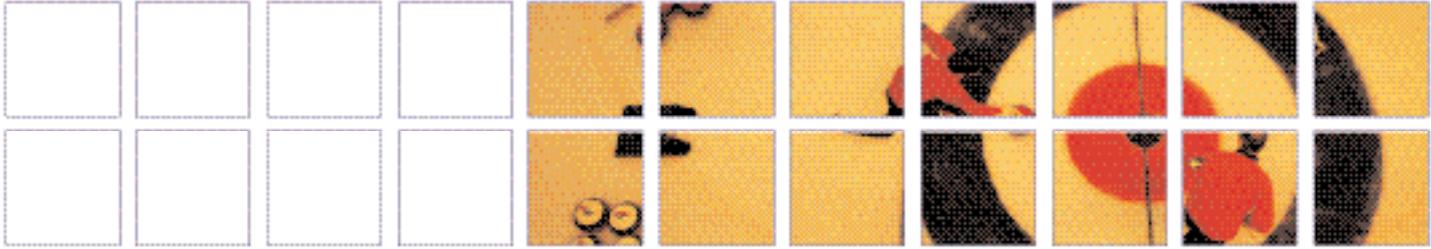
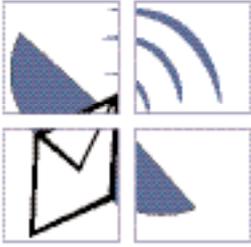
The types of information that are available, mostly concern legislation, regulations, practices, books, links, exhibitions, working papers, meeting minutes, conference minutes, presentations, templates, cd-rom, announcements, articles, standards, and cover a wide range of issues. A sample of EETT's intranet is presented in Figure 5 (see page 138).





## 7.7. Financial Statements

| NATIONAL TELECOMMUNICATIONS & POST COMMISSION   |   |                     |   |   |                   |  |  |  |
|---|---|---------------------|---|---|-------------------|--|--|--|
| BALANCE SHEET AS AT 31 DECEMBER 2003 - 9 <sup>th</sup> OPERATING PERIOD (1 JANUARY - 31 DECEMBER 2003) (AMOUNTS IN EURO)  |   |                     |   |   |                   |  |  |  |
| ASSETS  | Amounts for the Period ended 31-12-2003 |                     |   | Amounts for the Period ended 31-12-2002 |                   |  |  |  |
|   | Acquisition Value                       | Depreciation        | Net Value   | Acquisition Value                       | Depreciation      | Net Value  |  |  |
| <b>B. INSTALLATION EXPENSES</b>   |   |                     |   |   |                   |  |  |  |
| 1. Establishment & first installation expenses  | 8,878.80                                | 887.80              | 8,211.80  | 0.00                                    | 0.00              | 0.00   |  |  |
| 2. Other installation expenses (computers/software)   | 1,715,059.25                            | 115,107.44          | 1,599,951.81  | 134,891.05                              | 95,401.43         | 49,489.62  |  |  |
|   | 1,723,938.05                            | 116,000.24          | 1,607,937.81  | 134,891.05                              | 95,401.43         | 49,489.62  |  |  |
| <b>C. FIXED ASSETS</b>  |   |                     |   |   |                   |  |  |  |
| <b>II. Tangible Fixed Assets</b>  |   |                     |   |   |                   |  |  |  |
| 5. Transportation equipment   | 147,817.69                              | 87,170.58           | 65,188.11   | 147,817.69                              | 66,868.07         | 80,949.62  |  |  |
| 6. Furniture & other equipment  | 3,758,561.68                            | 582,587.50          | 3,217,454.08  | 1,830,860.77                            | 809,587.37        | 1,001,273.40   |  |  |
| 7. Fixed Assets under Construction & Down Payments  | 1,819,707.40                            |                     | 1,819,707.40  | 0.00                                    | 0.00              | 0.00   |  |  |
| <b>Total Tangible Assets (CII)</b>  | <b>5,726,076.77</b>                     | <b>1,054,692.17</b> | <b>4,701,384.60</b>   | <b>1,777,277.46</b>                     | <b>895,736.34</b> | <b>1,082,221.12</b>  |  |  |
| <b>III. Participations and other long-term financial assets</b>   |   |                     |   |   |                   |  |  |  |
| 7. Other long term claims   |   |                     | 195,758.79  |   |                   | 189,910.46   |  |  |
| <b>Total Fixed Assets (CII / CIII)</b>  |   |                     | <b>4,901,133.39</b>   |   |                   | <b>1,272,131.58</b>  |  |  |
| <b>D. CURRENT ASSETS</b>  |   |                     |   |   |                   |  |  |  |
| <b>II. Receivables</b>  |   |                     |   |   |                   |  |  |  |
| 1. Customers  |   |                     | 110,326.20  |   |                   | 189,833.57   |  |  |
| 11. Sundry Debtors  |   |                     | 1,371,102.61  |   |                   | 405,134.11   |  |  |
|   |   |                     | <b>1,811,428.81</b>   |   |                   | <b>595,967.68</b>  |  |  |
| <b>IV. Cash and Cash Equivalents</b>  |   |                     |   |   |                   |  |  |  |
| 1. Cash on hand   |   |                     | 657.91  |   |                   | 359.74   |  |  |
| 2. Time & Sight deposits  |   |                     | 153,187,946.76  |   |                   | 185,996,931.86   |  |  |
|   |   |                     | 153,188,604.67  |   |                   | 186,356,691.60   |  |  |
| <b>Total Current Assets (DII + DIV)</b>   |   |                     | <b>154,944,672.61</b>   |   |                   | <b>136,842,328.28</b>  |  |  |
| <b>F. TRANSIT DEBIT BALANCES</b>  |   |                     |   |   |                   |  |  |  |
| 1. Prepaid contracts  |   |                     | 1,563.14  |   |                   | 1,048.00   |  |  |
| 2. Unearned income  |   |                     | 2,690,871.58  |   |                   | 888,767.83   |  |  |
|   |   |                     | 2,692,434.72  |   |                   | 889,815.83   |  |  |
| <b>TOTAL ASSETS (B+C+D+E)</b>   |   |                     | <b>164,114,259.33</b>   |   |                   | <b>139,053,396.62</b>  |  |  |
| <b>DEBIT MEMO ACCOUNT</b>   |   |                     |   |   |                   |  |  |  |
| 2. Debt amounts of guarantees and collateral security   |   |                     | 27,368,288.66   |   |                   | 27,341,302.31  |  |  |
| 4. Other debit memo accounts  |   |                     | 157,826,077.22  |   |                   | 117,108,772.81   |  |  |
|   |   |                     | 185,221,364.21  |   |                   | 175,090,074.92   |  |  |
| <b>NOTE:</b> 1) The amounts under certain accounts of the Balance Sheet for the previous financial year have been adjusted to ensure compatibility with the corresponding amounts for the current period.<br>2) In the Balance Sheet account "Sundry Debtors" are included receivables amounting in total to 1,386,816,81 euros, from fines imposed by EETT decisions to obliged parties, due to violations of the legislation in force during the current and previous accounting periods. They will be collected in accordance with the procedure under the Public Revenues Collection Code and will be registered in the respective revenues of accounting periods they will be collected. The amounts from the aforementioned lines are in the transfer accounts of the liabilities "Fines imposed in 2003/04".   |   |                     |   |   |                   |  |  |  |
| <b>INCOME STATEMENT FOR THE YEAR ENDED 31 DECEMBER 2003 (1 JANUARY - 31 DECEMBER 2003)</b>  |   |                     |   |   |                   |  |  |  |
|   | Amounts for the Period ended 31-12-2003 |                     |   | Amounts for the Period ended 31-12-2002 |                   |  |  |  |
| <b>I. OPERATING RESULTS</b>   |   |                     |   |   |                   |  |  |  |
| Turnover (less received)  |   |                     | 30,991,054.61   |   |                   | 30,300,030.54  |  |  |
| Less: Cost of services provided   |   |                     | 8,787,156.15  |   |                   | 8,278,374.69   |  |  |
| Gross operating results   |   |                     | 22,103,898.46   |   |                   | 22,021,655.85  |  |  |
| Plus: Other operating income  |   |                     | 4,136,004.90  |   |                   | 912,066.07   |  |  |
| <b>Total</b>  |   |                     | <b>26,239,903.36</b>  |   |                   | <b>22,933,721.92</b>   |  |  |
| Less: 1. Administrative expenses  |   |                     | 1,810,450.01  |   |                   | 1,760,880.28   |  |  |
| Sum total of Operating results  |   |                     | 21,323,950.40   |   |                   | 20,205,170.51  |  |  |
| Plus: 4. Credit Interest and related income   |   |                     | 3,084,951.99  |   |                   | 4,211,933.91   |  |  |
| Less: 3. Interest and charges and related expenses  |   |                     | 4,516.86  |   |                   | 1,757.78   |  |  |
| <b>Total Operating Results</b>  |   |                     | <b>25,004,408.58</b>  |   |                   | <b>27,415,307.17</b>   |  |  |
| <b>II. PLUS: EXTRAORDINARY RESULTS</b>  |   |                     |   |   |                   |  |  |  |
| 1. Extraordinary and non operating income   |   |                     | 20,425.99   |   |                   | 2,077.66   |  |  |
| 3. Income from previous periods   |   |                     | 0.00  |   |                   | 7,045.01   |  |  |
|   |   |                     | 20,425.99   |   |                   | 9,122.67   |  |  |
| Less: 1. Extraordinary and non operating expenses   |   |                     | 245.99  |   |                   | 83.93  |  |  |
| 2. Prior periods expenses   |   |                     | 0.00  |   |                   | 507.12   |  |  |
| <b>Operating and extraordinary results</b>  |   |                     | <b>20,179.00</b>  |   |                   | <b>8,531.32</b>  |  |  |
| Total depreciation on fixed Assets  |   |                     | 401,046.08  |   |                   | 280,767.43   |  |  |
| Less: Depreciation incorporated to operating costs  |   |                     | 401,046.08  |   |                   | 280,767.43   |  |  |
| <b>NET PROFIT BEFORE TAX</b>  |   |                     | <b>25,024,008.99</b>  |   |                   | <b>27,423,902.72</b>   |  |  |
| <b>APPROPRIATION OF PROFITS</b>   |   |                     |   |   |                   |  |  |  |
|   |   |                     |   |   |                   |  |  |  |
| Net profits for the year  |   |                     | 138,008,216.12  |   |                   | 118,008,216.12   |  |  |
| Profits brought forward   |   |                     | 103,000,654.11  |   |                   | 138,000,245.12   |  |  |
| 8. Balance Carried Forward  |   |                     | 183,030,551.11  |   |                   | 138,008,216.12   |  |  |
|   |   |                     | <b>138,008,216.12</b>   |   |                   | <b>138,000,245.12</b>  |  |  |
| <b>REPORT OF CERTIFIED AUDITOR - ACCOUNTANT</b>   |   |                     |   |   |                   |  |  |  |
| <b>To the "National Telecommunications and Post Commission"</b>   |   |                     |   |   |                   |  |  |  |
| We have audited the above Financial Statements of the EETT regarding the financial administration for the period ended on 31 December 2003. Our audit was conducted in accordance with the provisions of article 13 paragraph B (under) 2887/2000 on the Organization and operation of the telecommunications sector and other provisions and with the audit procedures which we considered appropriate. According to the auditing principles and regulations followed by the Greek Institute of Certified Auditors - Accountants, which comply with the basic principles of the International Accounting Standards. The books and records kept have been made available to us and we have been provided with the information and explanations that we requested and which were required for the audit. The Greek Chart of Accounts has been correctly applied. The currency valuation method has not been modified as compared to the previous period. We have reviewed the contents of the Annual Report of the President of the EETT to the EETT Board. From our audit as above the following has been ascertained. The account "Customers" includes receivables amounting to 110,326.21 euros in total, from fines which were charged to the parties liable and were included in the operating revenues of 2003 and are to be collected in accordance with the procedure provided by the Public Revenues Collection Code. In our opinion, the above Financial Statements, which result from the books and records of the EETT, reflect, taking also into account our remark as above, the structure of assets and the financial position of the EETT as at 31 December 2003, as well as the profit and loss account for the financial year ended on that date. In accordance with the relevant provisions in force and with the generally accepted accounting principles which do not differ from those applied in the previous period. |   |                     |   |   |                   |  |  |  |
| <b>Athens, 12 March 2004</b>  |   |                     |   |   |                   |  |  |  |
| The Certified Auditor - Accountant<br><b>STAVROS EMM. PAPAANDERAKIS</b><br>(CPA REG. NO. 1485)<br>SOL. S.A. CERTIFIED PUBLIC AUDITORS   |   |                     |   |   |                   |  |  |  |
| THE ACCOUNTABLE FINANCIAL ADMINISTRATION<br>EETT CHAIRMAN<br><b>EMMANOUIL GIAKOUKAKIS</b><br>(EETT REG. NO. 51777)  |   |                     | HEAD OF THE DIRECTORATE FOR FINANCIAL AND ADMINISTRATIVE SERVICES<br><b>ANTONIOS A. DELIATSIOS</b><br>(EETT REG. NO. 11448) |   |                   | THE HEAD OF THE EETT ACCOUNTING DEPARTMENT<br><b>GIORGOS M. ORFANOS</b><br>(EETT REG. NO. 57107)<br>ECONOMIC CHAMBER OF GREECE CLASS A REG NO. 0003970 |  |  |



**GOALS**

## 8. Goals

2004 is the year of the Olympic Games. Consequently, EETT's actions and organisation have been structured in a way that renders EETT able to respond to the increased needs and demands during the Olympic Games.

In detail, the immediate goals set in the framework of the Business Plan (BP) concerning the Olympic Games, are:

- The timely provision of the necessary temporary radio communications station licences for use during the Games.
- Ensuring approved radio communications equipment use.
- The immediate and effective resolution of interference problems in the radio spectrum.

Furthermore, the National Spectrum Management and Monitoring System (NSMMS) will constitute an important tool for the safeguarding of a reliable radio communications environment, which will guarantee the unimpeded use of wireless and wired systems for the transmission of data, image and sound.

In what concerns the remaining of EETT's activities for 2004, these will be oriented to the following directions:

- Completion of the study of relevant markets on electronic communications networks and services, designation of Significant Market Power (SMP) Operators and proposal of remedies to abolish structural, legal or other barriers to market entry or competition reinforcement.
- Promulgation of secondary regulatory legislation due to the implementation of the new Regulatory Framework on electronic communications.
- Adoption of regulatory or other measures that will promote the implementation of Number Portability.
- Promotion of fast access to the Internet and

dissemination in general of broadband services.

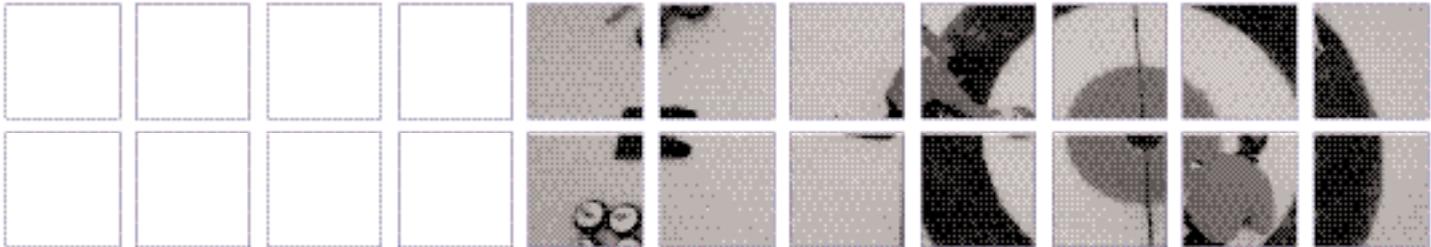
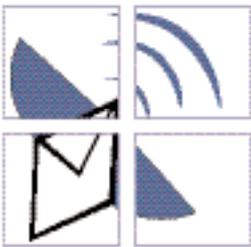
- Further reduction of the call termination tariffs from fixed to mobile networks.
- Safeguarding competition through control and confrontation of non-competitive practices.
- Promotion of regulatory or other form of measures concerning the implementation of Universal Service (US) and the improvement of quality of telecommunications services provided to consumers.
- Promotion of the Electronic Signature development and the increase in the use of Domain Names with a [.gr] suffix.
- Monitoring and participation in the European development of networks and electronic communications services market.
- Continuous and effective monitoring of the telecommunications market.
- Ensuring the optimum use of the radio spectrum's scarce resource, based on technical and economic criteria.
- Effective monitoring of the radio spectrum's legal use, also through the exploitation of NSMMS capabilities, rapid tracing of illegal use and adoption of suitable measures for its resolution.
- Implementation of improving procedures for a faster allocation and assignment of radio spectrum with the support of NSMMS.
- Effective surveillance telecommunications equipment use and rapid tracing of illegal use.
- Implementation of the European standard EN 13850 for the measurement of US quality and continuous monitoring of the US provision in the postal services sector.
- Implementation of the new regulatory framework for postal services.
- Completion and implementation of an effective system for the monitoring and control of the postal services market.
- Effective service and information provision to

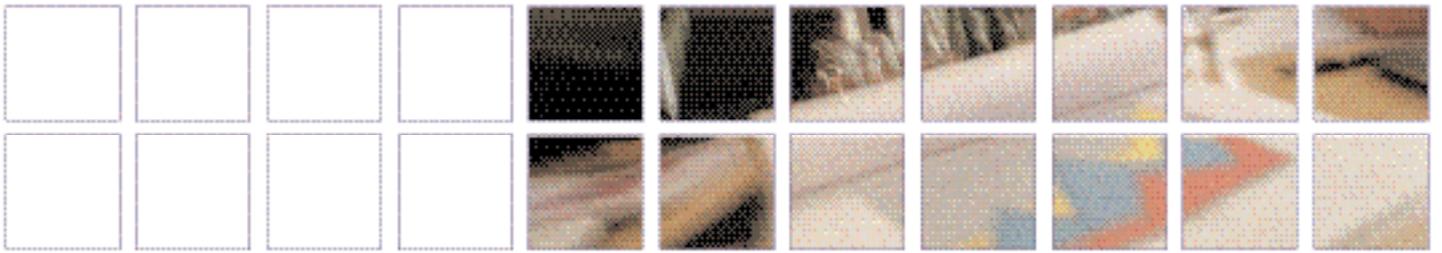
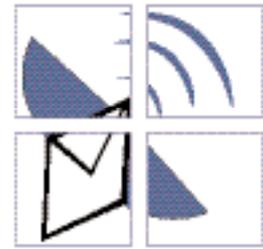


## GOALS

consumers, through the continuous improvement of the Consumer Service Sector (CSS), the provision of information and development of cooperation relations with consumer unions.

- ▶ Collaboration with telecommunications and postal undertakings for better services to consumers and to undertakings themselves.
- ▶ Exploitation of information technology for the provision of information to the public.
- ▶ Improvement of EETT structure and operation, by covering EETT needs in human resources, the completion of organisational procedures implementation, the revision of the BP as well as the establishment of regional offices.
- ▶ Gradual transition to an integrated infrastructure for automating EETT procedures and introduction of digital culture upon the commencement of implementation of the Integrated Information System (IIS).





**APPENDICES**



## Appendix I

### Greek Legislative – Regulatory Framework (as in force on 31 December 2003)

#### Laws

1. "Organisation and operation of telecommunications and other provisions" (Repeal of Law 2246/1994), Law 2867/2000, GG Issue 273/A/19-12-2000.
2. "On the Organisation and Operation of the Greek Telecommunications Organisation S.A. (OTE)", Law 2257/1994, GG Issue 197/A/23-11-1994.
3. "Regulation of matters regarding Organisations and Services of the Ministry of Transportation and Communications and other provisions", Law 2366/1995, GG Issue 256/A/12-12-1995.
4. "Listing of Shares of the Greek Telecommunications Organisation S.A. (OTE) in the Athens Stock Exchange (ASE) and other provisions", Law 2374/1996, GG Issue 32/A/29-02-1996.
5. "Legal status of private television and local radio, regulation of matters regarding the radio television market and other provisions", Law 2328/1995, GG Issue 159/A/03-08-1995.
6. "Matters under the competence of the Ministry of Transportation and Communications" (Amendment to Law 2246/1994), Law 2465/1997, GG Issue 28/A/26-02-1997.
7. "Structure and operation of the telecommunications market", Law 2578/1998, GG Issue 30/A/17-02-1998, article 12.
8. "Regulation of matters under the competence of the Ministry of Transportation and Communications and other provisions" (Amendment to Law 2246/1994), Law 2801/2000, GG Issue 46/A/03-03-2000.
9. "Organisation and operation of the telecommunications sector", Law 2246/1994, GG Issue 172/A/20-10-1994.
10. "Organisation and operation of public transportation by buses, technical vehicles control and land transport safety and other provisions" (Amendment of Law 2867/2000), Law 2963/2001, GG Issue 268/A/23-11-2001.
11. "Incorporation of a société anonyme banking company under the business name "Hellenic Postal Savings Bank S.A." and other provisions" (Amendment of Law 2867/2000), Law 3082/2002, GG Issue 316/A/16-12-2002.
12. "Amendment of Law 2668/1998 (GG Issue 282/A/18-12-1998), Harmonisation with Directive 2002/39/EC, Regulations of Hellenic Post Organisation (ELTA) and other provisions" Law 3185/2003, GG Issue 229/A/2003.

#### Presidential Decrees (PD)

1. PD 40/1996 "Open network provision in Leased Lines, in adaptation to Directive 1992/44/EEC as amended by Decision 1994/439/EC", GG Issue 27/A/22-02-1996.
2. PD 212/1997 "On the harmonisation of Greek Legislation to Directive 1994/46/EC", GG Issue 166/A/25-08-1997.
3. PD 122/1998 "On the equipment of satellite earth stations, in compliance with Directive 1993/97/EC complementing Directive 1991/263/EEC", GG Issue 103/A/15-05-1998.
4. PD 156/1999 "On the Amendment of Law 2246/1994 (GG Issue 172/A/20-10-1994) and of PD 40/1996 (GG Issue 276/A/19-12-1996) in compliance with Directive 1997/51/EC of the European Parliament and of the Council amending Council Directives 1990/387/EEC and 1992/44/EEC, for the purpose of adaptation to a Competitive Environment in Telecommunications", GG Issue 153/A/ 29-07-1999.
5. PD 157/1999 "Granting of General Authorisations and Individual Licences in the Sector of Telecommunications Services, in adaptation to Directive 1997/13/EC of the European Parliament and of the Council", GG Issue 153/A/29-07-1999.
6. PD 165/1999 "On the amendment of Law 2246/1994, as in force each time, in compliance with (a) Directive 1997/33/EC on interconnection in Telecommunications, ensuring Universal Service and interoperability through application of the principles of Open Network Provision (ONP), and (b) Directive 1998/61/EC on the amendment of Directive 1997/33/EC", GG Issue 159/A/4-08-1999.
7. PD 181/1999 "Adaptation to Directive 1998/10/EC on the implementation of Open Network Provision (ONP) on voice telephony and on Universal Service for telecommunications in a competitive environment", GG Issue 170/A/20-08-1999.



8. PD 150/2001 "Adaptation to Directive 1999/93/EC of the European Parliament and of the Council on a Community framework for Electronic Signatures", GG Issue 125/A/25-06-2001.
9. PD 342/2002 "Handling documents via electronic mail between public services, public law legal entities and Local Authorities or between these and persons or private law legal entities governed by private law and associations ", GG Issue 284/A/22-11-2002.
10. PD 343/2002 "Harmonisation of Greek legislation to the provisions of Directive 1998/84/EC of the European Parliament and of the Council of 20 November 1998 on the legal protection of services based on, conditional access [subscription services] [Official Journal (OJ) L. 320/28-11-1998, p. 54]", GG Issue 284/A/22-11-2002.

### **Ministerial Decisions**

1. MTC Decision 44 - "Establishment of the National Telecommunications Commission (EETT)", GG Issue 29/B/19-01-1995.
2. MTC Decision 68142 - "Regulation on Hearings", GG Issue 527/B/16-06-1995.
3. MTC Decision 68141 - "Ethics Code for the Exercise of Telecommunications Activities", GG Issue 581/B/4-07-1995.
4. MTC Decision 92093 - "Granting-Assignment of Frequencies and Determination of OTE Individual Licence Fees", GG Issue 1101/B/29-12-1995.
5. MTC Decision 59 - "Appointment of members and vice-chairmen to EETT", GG Issue 92/B/10-02-1999.
6. Decision 58648/4946 of the Deputy Minister of Transportation and Communications - "Granting of additional GSM 900/ DCS1800 Mobile Telephony Licences", GG Issue 1280/B/20-10-2000.
7. Decision 515/2001 of the Deputy Minister of Transportation and Communications - "Determination of public consultation procedure for granting Individual Licences under conditions limiting their number", GG Issue 177/B/21-02-2001.
8. Decision 26997/1737/2001 of the Deputy Minister of Transportation and Communications - "Limitation of the Number and procedure for granting additional Individual Licences for the provision of 2G (GSM/DCS) mobile services", GG Issue 549/B/11-05-2001.
9. Decision 26998/1738/2001 of the Deputy Minister of Transportation and Communications - "Limitation of the Number and procedure for granting Individual Licences for the provision of 3G (UMTS) mobile services", GG Issue 549/B/11-05-2001.
10. JMD 78870/14-12-2001 of the Ministers of Finance and of Transportation and Communications - "Regulation on the EETT conclusion of Agreements on Procurement, Services and Studies", GG Issue 1750/B/31-12-2001.
11. MD 44465/2002 "Definition of legal form, minimum capital and minimum mandatory staffing of telecommunications companies", GG Issue 7/B/11-01-2002.

### **EETT Regulatory Decisions pursuant to Law 2867/2000**

1. EETT Decision 205/6/2001 - "EETT Recommendation regarding the public consultation procedure for granting Individual Licences under conditions limiting their number".
2. EETT Decision 206/2/2001 - "National Numbering Plan for Telephony Services and for Mobile and Personal Communications Services", GG Issue 127/B/8-02-2001.
3. EETT Decision 207/2/2001 - "Regulation on Individual Licences", GG Issue 195/B/1-03-2001.
4. EETT Decision 207/3/2001 - "Regulation on General Authorisations", GG Issue 195/B/1-03-2001.
5. EETT Decision 218/38/2001 - "Amendment of EETT Decisions 207/2/2-02-2001 ('Regulation on Individual Licences') and 207/3/2-02-2001 ('Regulation on General Authorisations')", GG Issue 689/B/1-06-2001.
6. EETT Decision 207/6/2001 - "Regulation on the Management and Allocation of Numbers under the National Numbering Plan for Telephony Services and for Mobile and Personal Communications Services", GG Issue 159/B/16-02-2001.
7. EETT Decision 210/2/2001 - "Regulation on the Assignment of Individual Radio Frequencies or Radio Frequency Bands, under Individual Licence Status, for provision of Public Telecommunication Services", GG Issue 285/B/19-03-2001.
8. EETT Decision 211/3/2001 - "Regulation on Costing and Pricing Principles", GG 466/B/20-04-2001.
9. EETT Decision 215/31/2001 - "Regulation on the Management of Short Codes under the National Numbering Plan for Telephony Services and for Mobile and Personal



- Communications Services", GG 644/B/28-05-2001.
10. EETT Decision 217/29/2001 - "Reference Offer for Unbundled Access to the Local Loop of the Greek Telecommunications Organisation S.A. (OTE), Part I: Fully Unbundled Access", GG Issue 751/B/15-06-2001.
  11. EETT Decision 218/36/2001 - "Regulation on the Procedures, Terms and Conditions for Conclusion of National Roaming Agreements between Operators granted with Individual Licences for Installation, Operation or Exploitation of 2G and/or 3G Mobile Public Telecommunications Networks", GG Issue 735/B/13-06-2001.
  12. EETT Decision 227/86/2001 - "Antenna Mast Construction not requiring a Licence, pursuant to article I of Law 2801/2000", GG Issue 1226/B/20-09-2001.
  13. EETT Decision 228/23 "Amendment of EETT Decision 217/29/18-05- 2001 concerning the Reference Offer for Fully Unbundled Access to the Local Loop of the Greek Telecommunications Organisation S.A. (OTE) - GG Issue 751/B/2001", GG Issue 1261/B/28-09-2001.
  14. EETT Decision 233/34/2001 of 22 October 2001 - "Determination of the Basic Level for Itemised Billing of Users of Fixed Public Telephony Networks and/or Integrated Services Digital Networks (ISDN) and/or Fixed Public Telephony Services, including Value Added Services, and of the Parties under Obligation to Provide such Billing", GG Issue 1501/B/8-11-2001.
  15. EETT Decision 236/79/2001 - "Regulation on Licences for Land-based Antenna Mast Constructions", GG Issue 1649/B/11-12-2001.
  16. EETT Decision 238/95/2001 - "Reference Offer for Unbundled Access to the Local Loop of the Greek Telecommunications Organisation S.A. (OTE) - Part II: Shared Access to the Local Loop", GG Issue 1781/B/31-12-2001.
  17. EETT Decision 238/96/2001 - "Assignment of Radio Frequencies for Point-to-Point Links used, prior to the issuance of Ministerial Decision 62087/1998, by Public Telecommunications Services Providers", GG Issue 1773/B/31-12-2001.
  18. EETT Decision 239/69/2001 - "Amendment of MD 4829 GY/1992 'Granting of an Operating Licence for a GSM Cellular Telecommunications Network to 'STET HELLAS - Telecommunications S.A.' (GG Issue 586/B/1992)", GG Issue 142/B/12-02- 2002.
  19. EETT Decision 240/1/28-12-2001 - "Amendment of PD 437/1995 'Issue of Individual Licence for Installation, Development, Operation and Exploitation of Telecommunications Networks and for the Exercise of other Telecommunications Activities by the Greek Telecommunications Organisation S.A. (OTE) (GG Issue 250/A/1995), to the extent concerning the Individual Licence for Provision of Personal Communications Services through the Personal Communications Network based on DCS Technology, which was transferred to the Société Anonyme under the business name 'COSMOTE - Mobile Communications S.A.', by article 15 of Law 2465/1997", GG Issue 142/B/12-02-2002.
  20. EETT Decision 240/5/2002 - "Dates for Commencement of the Third Stage in the Introduction of the National Numbering Plan", GG Issue 25/B/16-01-2002.
  21. EETT Decision 240/13/2001 - "Designation of Parties under Obligation to provide Universal Service", GG Issue 23/B/16-01-2002.
  22. EETT Decision 244/124/2002 of 1 February 2002 - "Regulatory Provisions on Universal Service", GG Issue 188/B/20-02-2002.
  23. EETT Decision 247/63/2002 - "Provisional Interconnection Tariffs for Call Termination to OTE Network for 2002", GG Issue 319/B/19-03-2002.
  24. EETT Decision 248/57/2002 - "Amendment of EETT Decision 215/31/2-5-2001 ('Regulation on the Management of Short Codes under the National Numbering Plan for Telephony Services and for Mobile and Personal Communications Services)", GG Issue 458/B/15-04-2002.
  25. EETT Decision 248/64/2002 - "Amendment of EETT Decision 229/26/14-09-2001 ('Amendment of PD 437/1995 'Issue of Individual Licence for Installation, Development, Operation and Exploitation of Telecommunications Networks and for the Exercise of other Telecommunications Activities by the Greek Telecommunications Organisation S.A. [OTE]')", GG Issue 500/B/24-04-2002.
  26. EETT Decision 248/68/2002 - "Designation of SMP Operators in the Market for Public Mobile Telephony Networks and Public Mobile Telephony Services", GG Issue 382/B/ 29-03-2002.
  27. EETT Decision 248/71/2002 - "Regulation on the Provision of Electronic Signature Certification Services", GG Issue 603/B/16-05-2002.



28. EETT Decision 249/115/2002 - "Regulation on Hearings concerning Telecommunications Issues", GG Issue 642/B/23-05-2002.
29. EETT Decision 251/77/2002 - "Designation of SMP operators in the leased lines provision market GG Issue 527/B/29-04-2002.
30. EETT Decision 253/87/2002 - "Prices for Fully Unbundled and Shared Access to the Local Loop", GG Issue 720/B/13-06-2002.
31. EETT Decision 254/70/2002 - "Regulation on the Introduction of Carrier Pre-selection in the Greek Market", GG Issue 773/B/21-06-2002.
32. EETT Decision 254/71/2002 - "Regulation on the Introduction of Number Portability in the Greek Market", GG Issue 791/B/26-06-2002.
33. EETT Decision 254/72/2002 - "Regulation on the Assignment of Individual Radio Frequencies for Private Wireless Links", GG Issue 895/B/16-07-2002.
34. EETT Decision 255/83/2002 - "Regulation on the Definition of the Universal Service Content", GG Issue 874/B/12-07-2002.
35. EETT Decision 255/84/2002 - "Regulation on issues related to the Provision of Leased Lines", GG Issue 810/B/28-06-2002.
36. EETT Decision 261/143/2002 - "Regulation on Universal Service Costing and Pricing Principles", GG Issue 1208/B/18-09-2002.
37. EETT Decision 262/107/2002 - "Special measures for protecting Monitoring Stations of the National Radio Spectrum Management and Monitoring System against harmful interference", GG Issue 1262/B/26-09-2002.
38. EETT Decision 264/140/2002 – Designation of Parties under Obligation to provide Universal Service", GG Issue 789/B/24-10-2002.
39. EETT Decision 265/122/2002 - "Determination of the use of numbers of the "696" series under the National Numbering Plan", GG Issue 1440/B/15-11-2002.
40. EETT Decision 266/92/2002 - "Regulations concerning Short Codes under the National Numbering Plan", GG Issue 1440/B/15-11-2002.
41. EETT Decision 266/96/2002 - "Publication of an EETT Declaration regarding OTE's Compliance with the Cost Accounting System approved by EETT for the Voice Telephony Services provided", GG Issue 1440/B/15-11-2002.
42. EETT Decision 267/100/2002 - "Determination of Short Code in connection with the Universal Service Obligation deriving from article 6, paragraph 8 of EETT Decision 255/83/14-6-2002 ('Determination of Universal Service Content')", GG Issue 1518/B/4-12-2002.
43. EETT Decision 267/123/2002 - "Publication of an EETT Declaration regarding OTE's Compliance with the EETT - approved Cost Accounting System for the Interconnection Services provided - Adoption and Publication in the Government Gazette", GG Issue 1531/B/9-12-2002.
44. EETT Decision 268/77/2002 - "Regulation on Management and Assignment of [.gr] Domain Names", GG Issue 1617/B/31-12-2004.
45. EETT Decision 268/77/2002 - "Introduction of Part Circuits in the Greek Market", GG Issue 1604/B/30-12-2002.
46. EETT Decision 269/73/2002 - "OTE Offer for Provision of Pre-agreed SLA Leased Line Services", GG Issue 17/B/14-01-2003.
47. EETT Decision 239/73/2003 - "Regulation on Management of Directory Enquiries Services Shorth Codes" GG Issue 604/B/15-05-2003.
48. EETT Decision 276/40/2003 - "Regulation on Management of Routing Numbers", GG Issue 604/B/15-05-2003.
49. EETT Decision 276/41/2003 - "Consumer Information on audiotext service fees and SMS of additional charge", GG Issue 595/ B/14-05-2003.
50. EETT Decision 277/63/2003 - "Results of Cost Control on Tariffs of Fully Unbundled and Shared Access to OTE's Local Loop/ Publication of New Prices", GG Issue 331/B/20-03-2003.
51. EETT Decision 277/64/2003 "Regulation on Control Procedures and Publication Obligations for Telecommunications Services or/ and Networks Providers Tariffs", GG Issue 514/B/2-05-2003.
52. EETT Decision 279/32/2003 "Regulation on the Designation of Notified Bodies according to PD 44/2002", GG Issue 441/B/14-04-2003.
53. EETT Decision 294/55/2003 "Regulation on the Publication of Technical Interfaces of Public Telecommunications Networks according to PD 44/2002", GG Issue 1590/B/30-10-2003.
54. EETT Decision 295/63/2003 "Regulation on Designation of Bodies to Ascertain Compliance of Secure Signature Creation Devices for Electronic Signature and of Secure Cryptographic Units and Bodies to Ascertain Compliance of

Certification Services Providers with Voluntary Accreditation Criteria", GG Issue 1730/B/24-11-2003.

55. EETT Decision 295/64/2003 "Regulation on the Compliance Control of Secure Signature Creation Devices for Electronic Signature and of Secure Cryptographic Units", GG Issue 1730/B/24-11-2003.
56. EETT Decision 295/65/2003 "Regulation on Voluntary Accreditation of Certification Services Providers", GG Issue 1730/B/24-11-2003.
57. EETT Decision 296/49/2003 "Regulation on Radio Equipment Notification to EETT", GG Issue 1881/B/17-12-2003.
58. EETT Decision 296/93/2003 "Regulation on General Authorisations for Postal Services Provision", GG Issue 1682/B/14-11-2003.
59. EETT Decision 299/46/2003 "Results of OTE's 2003 Cost Control (with actual data of the year 2001) for the services under regulation", GG Issue 1925/B/24-12-2003.
60. EETT Decision 300/44/2003 "Regulation on Individual Licences for Postal Services Provision", GG Issue 1906/B/22-12-2003.
61. EETT Decision 300/47/2003 "Completion of OTE's 2003 Cost Control (with actual data of the year 2001) – Approval of Final Results", GG Issue 1925/B/24-12-2003.
62. EETT Decision 301/28/2003 "Regulation on Definition of Objective Costing Methods applied to the Internal Accounting System of the Universal Service Provider", GG Issue 1993/B/31-12-2003.
63. EETT Decision 301/30/2003 "Decision on the Proposal of OTE concerning its New Pricing Policy for Fixed Voice Telephony" of the year 2003, GG Issue 1925/B/24-12-2003.
64. EETT Decision 302/11/2003 "Microcell Antenna Systems for which a licence is not required pursuant to article I of Law 2801/2000", GG Issue 91/B/23-01-2004.



## Appendix II

### European Union Regulatory Framework for the Telecommunications Sector (as in force on 31 December 2003)

1. Council Directive 1987/372/EEC of 25 June 1987 on the frequency bands to be reserved for the coordinated introduction of public pan-European cellular digital land-based mobile communications in the Community.
2. Commission Directive 1988/301/EEC of 16 May 1988 on competition in the markets in telecommunications terminal equipment.
3. Directive 1995/62/EC of the European Parliament and of the Council of 13 December 1995 on the application of Open Network Provision (ONP) to voice telephony.
4. Directive 1997/67/EC of the European Parliament and of the Council of 15 December 1997 on common rules for the development of the internal market of Community postal services and the improvement of quality of service.
5. Commission Decision 97/607/EC of 18 June 1997 concerning the granting of additional implementation periods to Greece for the implementation of Directive 1990/388/EEC as regards full competition in the telecommunications markets.
6. Directive 1998/84/EC of the European Parliament and of the Council of 20 November 1998 on the legal protection of services based on, or consisting of, conditional access.
7. Directive 1998/61/EC of the European Parliament and of the Council of 24 September 1998 amending Directive 1997/33/EC with regard to operator Number Portability and Carrier Pre-selection.
8. Directive 1999/5/EC of the European Parliament and of the Council of 9 March 1999 on Radio Equipment and Telecommunications Terminal Equipment and the mutual recognition of their conformity.
9. Regulation 2887/2000/EC of the European Parliament and of the Council of 18 December 2000 on Unbundled Access to the Local Loop.
10. Directive 2002/21/EC of the European Parliament and of the Council of 7 March 2002 on a common regulatory framework for electronic communications networks and services (Framework Directive), OJ L 108, 24-04-2002, p. 0033-0050.
11. Directive 2002/20/EC of the European Parliament and of the Council of 7 March 2002 on the authorisation of electronic communications networks and services (Authorisation Directive), OJ L 108, 24-04-2002, p. 0021-0032.
12. Directive 2002/19/EC of the European Parliament and of the Council of 7 March 2002 on access to, and interconnection of, electronic communications networks and associated facilities (Access Directive), OJ L 108, 24-04-2002, p. 0007-0020.
13. Directive 2002/22/EC of the European Parliament and of the Council of 7 March 2002 on Universal Service and users' rights relating to electronic communications networks and services (Universal Service Directive), OJ L 108, 24-04-2002 P. 0051-0077.
14. Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications), OJ L 201, 31-07-2002, p. 0037-0047.
15. Commission Directive 2002/77/EC of 16 September 2002 on competition in the markets for electronic communications networks and services, OJ L 249, 17-09-2002, p. 0021-0026.
16. Decision 676/2002/EC of the European Parliament and of the Council of 7 March 2002 on a regulatory framework for radio spectrum policy in the European Community (Radio Spectrum Decision), OJ L 108, 24-04-2002, p. 0001-0006.

17. Decision 2002/627/EC of 29 July 2002 establishing the European Regulators Group for electronic communications networks and services, OJ L. 200, 30-07-2002, p. 0038-0040.
18. Regulation 1/2003/EC of the European Council of 16 December 2002 on the implementation of the rules on competition laid down in articles 81 and 82 of the Treaty, OJ L. 1 of the 4-01-2003, p. 0001-0025.
19. Decision 2003/548/EC of the European Commission of 24 July 2003 on the minimum set of Leased Lines with harmonised characteristics, and associated standards, referred to in article 18 of the Universal Service Directive, OJ L. 186 of the 25-07-2003, p. 0043-0045.



## Appendix III

### List of Undertakings Licensed to Provide Telecommunications Services (as in force on 31 December 2003)

| A. INDIVIDUAL LICENCES  |                                     |                                    |              |        |                                  |
|---|-------------------------------------|------------------------------------|--------------|--------|----------------------------------|
| INSTALLATION & OPERATION & EXPLOITATION OF FIXED NETWORK AND PROVISION OF VOICE TELEPHONY |                                     |                                    |              |        |                                  |
| No  | DISTINCTIVE TITLE                   | ADDRESS                            | CITY         | PC     | TEL./FAX                         |
| 1   | COSMOTE S.A.                        | 44 KIFISSIAS AVE.                  | MAROUSSI     | 151 25 | +30210 617 7777/ +30210 617 7384 |
| 2   | EUROPROM TELECOMMUNICATIONS S.A.    | 209 KIFISSIAS AVE.                 | MAROUSSI     | 151 24 | +30210 614 1106/ +30210 809 7620 |
| 3   | FORTHNET S.A.                       | 4 ATTHIDON ST.                     | KALLITHEA    | 176 71 | +30210 955 9000/ +30210 955 9444 |
| 4   | GRAPES HELLAS S.A.                  | 12 ZISSIMOPOULOU ST.               | ATHENS       | 115 24 | +30210 698 7200/ +30210 698 7105 |
| 5   | INFO QUEST S.A.                     | 2A ARGIROUPOLEOS ST.               | KALLITHEA    | 176 76 | +30210 950 4672/ +30210 950 4530 |
| 6   | INTRACONNECT S.A.                   | 5 KLISSOURAS ST. & TATOIOU AVE.    | METAMORFOSSI | 144 52 | +30210 285 5830/ +30210 285 5839 |
| 7   | LAN-NET S.A.                        | 6 CHIMARAS ST.                     | MAROUSSI     | 151 25 | +30210 616 7000/ +30210 616 7100 |
| 8   | MEDITERRANEAN BROADBAND ACCESS S.A. | 4 ATTHIDON ST.                     | KALLITHEA    | 176 71 | +30210 955 9050/ +30210 955 9055 |
| 9   | OTE                                 | 99 KIFISSIAS AVE.                  | MAROUSSI     | 151 25 | +30210 611 1000/ +30210 611 7456 |
| 10  | STET HELLAS S.A.                    | 66 KIFISSIAS AVE.                  | MAROUSSI     | 151 25 | +30210 615 8000/ +30210 610 9957 |
| 11  | TELLAS S.A.                         | 1A & 3 NEAPOLEOS ST.               | MAROUSSI     | 151 23 | +30210 811 3411/ +30210 811 3459 |
| 12  | VIVODI TELECOMMUNICATIONS S.A.      | 29-31 DERIGNY ST. & 18 ELPIDOS ST. | ATHENS       | 104 34 | +30210 889 3700/ +30210 889 3701 |
| 13  | VODAFONE                            | 44 KIFISSIAS AVE.                  | MAROUSSI     | 151 25 | +30210 616 0000/ +30210 616 0001 |

| INSTALLATION & OPERATION & EXPLOITATION OF FIXED NETWORK |                                    |                              |           |        |                                  |
|--|------------------------------------|------------------------------|-----------|--------|----------------------------------|
| No   | DISTINCTIVE TITLE                  | ADDRESS                      | CITY      | PC     | TEL./FAX                         |
| 1  | ATTICA TELECOMMUNICATIONS          | 18 FILELLINON ST.            | CHALANDRI | 152 32 | +30210 687 3800/ +30210 685 2490 |
| 2  | MEDITERRANEAN NAUTILUS GREECE S.A. | SOKRATOUS ST. & 2 KIPROU ST. | MELISSIA  | 151 27 | +30210 810 2633/ +30210 803 0555 |

| PROVISION OF VOICE TELEPHONY SERVICES |                            |                                  |            |        |                                  |
|---------------------------------------|----------------------------|----------------------------------|------------|--------|----------------------------------|
| No                                    | DISTINCTIVE TITLE          | ADDRESS                          | CITY       | PC     | TEL./FAX                         |
| 1                                     | ACN S.A.                   | 14 PATMOU ST.                    | MAROUSSI   | 151 23 | +30210 687 2900/ +30210 687 2901 |
| 2                                     | ALGONET S.A.               | 206 SINGROU AVE.                 | N. SMIRNI  | 171 21 | +30210 931 0282/ +30210 935 2873 |
| 3                                     | COSMOLINE                  | 47 AG. KONSTANTINOU ST.          | MAROUSSI   | 151 24 | +30210 812 6000/ +30210 812 6100 |
| 4                                     | NET ONE S.A.               | 2 PERIKLEOUS ST.                 | N.PSICHIKO | 154 51 | +30210 678 1300/ +30210 678 1390 |
| 5                                     | NEWSPHONE                  | 280 THISEOS ST.                  | KALLITHEA  | 176 75 | +30210 947 2222/ +30210 947 2223 |
| 6                                     | RG COMMUNICATIONS          | 34 VERANTZEROU ST.               | ATHENS     | 104 32 | +30210 899 6516/ +30210 899 6519 |
| 7                                     | STARCOM S.A.               | 12 FORMIONOS ST.                 | ATHENS     | 116 34 | +30210 729 2980/ +30210 729 7757 |
| 8                                     | TELEDOME S.A.              | 10 FILARETOU ST. & DOIRANIS ST.  | KALLITHEA  | 176 72 | +30210 956 9277/ +30210 956 3882 |
| 9                                     | TELEPASSPORT (HELLAS) S.A. | 81 PATISSION ST. & 8 HEYDEN ST.  | ATHENS     | 104 03 | +30210 820 9000/ +30210 820 9009 |
| 10                                    | VOICENET                   | 5 PROFITI ILIA SQ.               | PANGRATI   | 116 35 | +30210 757 3100/ +30210 757 3111 |
| 11                                    | WEB COMMUNICATIONS         | 72 28 <sup>ο</sup> OKTOVRIOU ST. | N.IONIA    | 142 31 | +30210 272 0006/ +30210 271 4008 |

| INSTALLATION, OPERATION AND EXPLOITATION OF 2G MOBILE NETWORKS AND PROVISION OF 2G SERVICES |                   |                   |           |        |                                  |
|---|-------------------|-------------------|-----------|--------|----------------------------------|
| No  | DISTINCTIVE TITLE | ADDRESS           | CITY      | PC     | TEL./FAX                         |
| 1   | COSMOTE S.A.      | 44 KIFISSIAS AVE. | MAROUSSI  | 151 25 | +30210 617 7777/ +30210 617 7384 |
| 2   | INFO QUEST S.A.   | 25 AL. PANTOU ST. | KALLITHEA | 176 71 | +30210 929 9400/ +30210 929 9499 |
| 3   | STET HELLAS S.A.  | 66 KIFISSIAS AVE. | MAROUSSI  | 151 25 | +30210 615 8000/ +30210 610 9957 |
| 4   | VODAFONE          | 44 KIFISSIAS AVE. | MAROUSSI  | 151 25 | +30210 616 0000/ +30210 616 0001 |

| INSTALLATION, OPERATION AND EXPLOITATION OF 3G MOBILE NETWORKS AND PROVISION OF 3G SERVICES |                   |                   |          |        |                                  |
|---|-------------------|-------------------|----------|--------|----------------------------------|
| No  | DISTINCTIVE TITLE | ADDRESS           | CITY     | PC     | TEL./FAX                         |
| 1   | COSMOTE S.A.      | 44 KIFISSIAS AVE. | MAROUSSI | 151 25 | +30210 617 7777/ +30210 617 7384 |
| 2   | STET HELLAS S.A.  | 66 KIFISSIAS AVE. | MAROUSSI | 151 25 | +30210 615 8000/ +30210 610 9957 |
| 3   | VODAFONE          | 44 KIFISSIAS AVE. | MAROUSSI | 151 25 | +30210 616 0000/ +30210 616 0001 |



| INSTALLATION, OPERATION AND EXPLOITATION OF SATELLITE NETWORKS AND PROVISION OF SATELLITE COMMUNICATIONS SERVICES |                                      |                                     |             |        |                                  |
|---|--------------------------------------|-------------------------------------|-------------|--------|----------------------------------|
| No  | DISTINCTIVE TITLE                    | ADDRESS                             | CITY        | PC     | TEL./FAX                         |
| 1   | ALPHA DIGITAL SYNTHESIS S.A. (A.D.S) | 201 PIREOS ST.                      | ATHENS      | 118 53 | +30210 489 7459/ +30210 489 7411 |
| 2   | ANTENNA SATELLITE S.A.               | 10-12 KIFISSIAS AVE.                | MAROUSSI    | 151 25 | +30210 688 6400/ +30210 689 2113 |
| 3   | COM-TO-NET S.A.                      | 13 EGIDON ST. & SENEKA ST.          | N. KIFISSIA | 145 64 | +30210 624 9600/ +30210 625 3761 |
| 4   | FORTHNET S.A.                        | 4 ATTHIDON ST.                      | KALLITHEA   | 176 71 | +30210 955 9000/ +30210 955 9444 |
| 5   | INTELCO S.A.                         | 11 THERMOPILON ST. & MAKEDONIAS ST. | CHALANDRI   | 152 33 | +30210 689 4610/ +30210 689 4608 |
| 6   | KB IMPULS HELLAS S.A.                | 109 AMFITHEAS AVE.                  | P. FALIRO   | 175 63 | +30210 988 1430/ +30210 985 4736 |
| 7   | OTE                                  | 99 KIFISSIAS AVE.                   | MAROUSSI    | 151 25 | +30210 611 1000/ +30210 611 7456 |
| 8   | SYNED                                | MANIS ST.                           | KANTZA      | 151 23 | +30210 660 2212/ +30210 604 0611 |
| 9   | TELESPAZIO S.p.A.                    | VIA TIBURTINA 965                   | ROMA        | 00 156 | +39 06 40791/ +39 06 4079372     |
| 10  | UNITEL HELLAS S.A.                   | 151 SEVASTOPOLEOS ST.               | ATHENS      | 115 26 | +30210 950 4780/ +30210 950 4781 |

| PROVISION OF WIRELESS LOCAL AREA NETWORK (W-LAN) SERVICES |                   |                                |          |        |                                  |
|---|-------------------|--------------------------------|----------|--------|----------------------------------|
| No  | DISTINCTIVE TITLE | ADDRESS                        | CITY     | PC     | TEL./FAX                         |
| 1   | COSMOTE S.A.      | 44 KIFISSIAS AVE.              | MAROUSSI | 151 25 | +30210 617 7777/ +30210 617 7384 |
| 2   | OTENET S.A.       | 56 KIFISSIAS AVE. & DELFON ST. | MAROUSSI | 151 25 | +30210 615 1600/ +30210 615 1700 |
| 3   | VODAFONE          | 44 KIFISSIAS AVE.              | MAROUSSI | 151 25 | +30210 616 0000/ +30210 616 0001 |

| INSTALLATION, OPERATION AND EXPLOITATION OF TETRA NETWORKS AND PROVISION OF TETRA SERVICES |                   |                   |          |        |                                  |
|--|-------------------|-------------------|----------|--------|----------------------------------|
| No   | DISTINCTIVE TITLE | ADDRESS           | CITY     | PC     | TEL./FAX                         |
| 1  | OTE               | 99 KIFISSIAS AVE. | MAROUSSI | 151 25 | +30210 611 1000/ +30210 611 7456 |



## B. GENERAL AUTHORISATIONS

| No | REG. NO. | DISTINCTIVE TITLE        | ADDRESS                      | CITY           | PC     | TEL./FAX                         | SERVICES UNDER THE GENERAL AUTHORISATION  |
|----|----------|--------------------------|------------------------------|----------------|--------|----------------------------------|---|
| 1  | 96-031   | A.S.D.A.                 | 65 ETHNIKIS ANTISTASSEOS ST. | PERISTERI      | 121 34 | +30210 574 5826/ +30210 575 9547 | A0701, A0401  |
| 2  | 01-275   | ABC TELECOM HELLAS S.A.  | 8 MARINOY ANTIPA ST.         | PILEA          | 570 01 | +30231 047 6620/ +30231 047 6613 | A1102   |
| 3  | 99-203   | ACIS GROUP               | 7 KARATASSOU ST.             | THESSALONICA   | 546 26 | +30231 054 2605/ +30231 054 2614 | A0401, A0701  |
| 4  | 96-026   | ACN S.A.                 | 14 PATMOY ST.                | MAROUSSI       | 151 23 | +30210 687 2900/ +30210 687 2901 | A1002, A0101, A0201, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0602, A0603, A0604, A0605, A0606, A0607, A0801, A0802, A0803, A0901, A1101, A1202, B0103, C0101, C0201, C0202, C0203, C0204, C0205, C0302, C0303, C0401, C0402, C0403, A0202, A0301, A0601, A0701, A1001, A1102 |
| 5  | 98-011   | ALFA ENGINEERING         | 7 KONSTANTINIDI ST.          | NAOUSSA        | 592 00 | +30229 602 6194/ +30229 602 2528 | A0701   |
| 6  | 02-019   | ALFA TEL                 | 70 AG. PANTELEIMONOS ST.     | KERATSINI      | 187 55 | +30210 462 6145/ +30210 463 6894 | A1102   |
| 7  | 01-237   | ALFANET S.A.             | 9 ACHELOOY ST.               | THESSALONICA   | 546 27 | +30231 050 0760/ +30231 050 0767 | A0301, A0401, A0602, A0701  |
| 8  | 99-192   | ALGONET S.A.             | 206 SINGROU AVE.             | KALLITHEA      | 176 72 | +30210 955 8300/ +30210 955 8301 | A0101, A0401, A0501, A0502, A0503, A0603, A0604, A0605, A0606, A0607, A0201, A0202, A0301, A0403, A0601, A0701, A1001, A1002, A1101, A1102, A1103   |
| 9  | 01-292   | ALPHA NETWORK S.A.       | 5 FRAGKOUIDI ST.             | KALLITHEA      | 176 71 | +30210 920 3700/ +30210 920 3799 | A0201, A0301, A0302, A0402, A0601, A0602, A0603, A0604, A0605, A0606, A1001, A1002, A1101, A0401, A0701, A1102  |
| 10 | 98-003   | ALPHALINE                | 19 MEANDROY ST.              | ATHENS         | 115 28 | +30210 728 0800/ +30210 728 0803 | A1102   |
| 11 | 98-007   | ALTA S.A.                | 17A LISSIKRATOUS ST.         | ATHENS         | 105 58 | +30210 323 9034/ +30210 323 2000 | A0201, A1001, A0303, A0403, A0601   |
| 12 | 03-039   | ALTEC S.A.               | 12 PATMOY ST.                | MAROUSSI       | 151 23 | +30210 687 2200/ +30210 687 2288 | A0101, A0201, A0301, A0401, A0403, A0411, A0601, A0602, A0604, A0605, A0701, A1001, A1002   |
| 13 | 99-195   | AMIMEX LTD.              | 15-17 SARANTAPICHOU ST.      | ATHENS         | 114 71 | +30210 645 3376/ +30210 645 3367 | A1201, A0101, A0603, A0604, A1001, A1002, A1101, A1103, A0403, A0701, A0301, A0601  |
| 14 | 00-025   | AN.ET.A. S.A.            | 1 DIMOKRATIAS AVE.           | ALEXANDROUPOLI | 681 00 | +30255 108 8340/ +30255 108 8342 | A0701, A0101, A0201, A0401, A0501, A0604, A0605, A0901, A0301   |
| 15 | 01-229   | ANTENNA INTERNET S.A.    | 10-12 KIFISSIAS AVE.         | MAROUSSI       | 151 25 | +30210 688 6727/ +30210 688 6542 | A0701   |
| 16 | 01-278   | ANTENNA TV S.A.          | 10-12 KIFISSIAS AVE.         | MAROUSSI       | 151 25 | +30210 688 6100/ +30210 689 0304 | A0701   |
| 17 | 00-026   | APOPSI S.A.              | 33 M. BOTSARI ST.            | DRAPETSONA     | 186 48 | +30210 462 9300/ +30210 461 9565 | A0701   |
| 18 | 01-264   | ARGONET                  | 35 XENOFONTOS ST.            | VOLOS          | 383 33 | +30242 107 6400/ +30242 102 9049 | A0401, A0701  |
| 19 | 00-023   | ASTRA INTERNATIONAL S.A. | 9 GUILFORDOY ST.             | ATHENS         | 104 34 | +30210 825 4200/ +30210 823 4184 | A1102   |



| No | REG. NO. | DISTINCTIVE TITLE               | ADDRESS   | CITY                      | PC     | TEL./FAX                                    | SERVICES UNDER THE GENERAL AUTHORISATION   |
|----|----------|---------------------------------|---|---------------------------|--------|---|--|
| 20 | 99-201   | AT & T G.N.S. LTD.              | 284 KIFISSIAS AVE.                              | CHALANDRI                 | 152 32 | +30210 685 6222/ +30210 688 1562            | A0201, A0202, A0302, A0403, A0501, A0503, A0601, A0602, A0603, A0605, A0606, A1002, A0401, A0407, A0301, A0402, A0604  |
| 21 | 03-069   | ATHENSLINE                      | 3 - 5 FILODAMEIAS ST.                           | ATHENS                    | 104 42 | +30210 515 6740/ +30210 515 6741            | A1102  |
| 22 | 97-024   | ATLAS NET                       | 5 IVISKOU ST. & PEFKON ST.                      | AG. IEROTHEOS - PERISTERI | 121 37 | +30210 577 9969/ +30210 578 6532            | A0701  |
| 23 | 02-030   | ATTIKES TELECOMMUNICATIONS S.A. | 78A LOUIZIS RIANKOUR ST.                        | ATHENS                    | 115 23 | +30210 693 0670-4/ +30210 693 0675          | A0101, A0201, A0301, A0302, A0602, A0603, A0604, A0801   |
| 24 | 97-016   | AUCS HELLAS S.A.                | 38 KIFISSIAS AVE.                               | MAROUSSI                  | 151 25 | +30210 619 8872/ +30210 619 8995            | A0701, A0301, A0402, A0602, A0604, A0605, A0401, A0601, A0603  |
| 25 | 96-033   | AUDIOTEX S.A.                   | 10-12 KIFISSIAS AVE.                            | MAROUSSI                  | 151 25 | +30210 680 0840-3/ +30210 680 0843          | A1102  |
| 26 | 01-012   | AURORA GLOBAL SOLUTIONS S.A.    | 48 ZEPOU ST.                                    | GLIFADA                   | 166 75 | +30210 893 1000/ +30210 893 1000            | A0101, A0201, A0301, A0302, A0411, A0601, A0605, A0606, A0701, A0901, A1001  |
| 27 | 02-081   | AXIOM NET S.A                   | 4 PINIOU ST.                                    | THESSALONICA              | 562 24 | +30231 076 1561/ +30231 070 6795            | A0101, A0201, A0401, A0701, A0901  |
| 28 | 01-240   | AXIOMA                          | 3 THIATIRON ST.                                 | N. SMIRNI                 | 171 21 | +30210 935 1512/ +30210 935 3688            | A0701, A1102   |
| 29 | 96-038   | BEE COMMUNICATION S.A.          | 19 PALEOLOGOU ST.                               | LARISSA                   | 412 23 | +30241 055 4045/ +30241 055 0333            | A0604, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411   |
| 30 | 02-013   | BELGACOM                        | BOULEVARD DU ROI ALBERT II 27                   | BRUSSELS                  | 1030   | +32 220 28337/ +32 220 34683                | A0201, A0202, A0301, A0701, A1001  |
| 31 | 01-027   | BEST DELIVCOM                   | 47 FAVIEROU ST.                                 | CHALKIDA                  | 341 00 | +30222 106 1170/ +30222 106 1172            | A0101, A0201, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701  |
| 32 | 01-239   | BOLERO                          | 1 NOTARA ST.                                    | ATHENS                    | 106 83 | +30210 384 7970/ +30210 935 3688            | A1102  |
| 33 | 03-034   | B-PHONE                         | 3 <sup>rd</sup> km SYMMACHIKIS ST. ORAIOKASTROU | PALAIOKASTRO              | 570 13 | +30231 069 1186/ +30231 069 1159            | A1102  |
| 34 | 02-042   | CABLE & WIRELESS COMMUNICATIONS | 124 THEOBALDS ROAD                              | LONDON, WC1X              | 8RX UK | +44(0) 207 315 4000/<br>+44(0) 207 315 5000 | A0101, A0201, A0202, A0301, A0302, A0401, A0402, A0403, A0404, A0405, A0501, A0601, A0602, A0604, A0605, A0701   |
| 35 | 01-244   | CALL CENTER                     | 1 VILARA ST.                                    | THESSALONICA              | 546 25 | +30231 055 5801-2/ +30231 053 3412          | A1102  |
| 36 | 96-006   | CHIOS COMPULINK                 | 31 EL. VENIZELOU ST.                            | CHIOS                     | 821 00 | +30227 108 8331/ +30227 108 1332            | A0701  |
| 37 | 00-018   | CITISHOP S.A.                   | 501 MESSOGION AVE.                              | AG. PARASKEVI             | 153 43 | +30210 606 8213/ +30210 600 2037            | A0301, A0601, A1001, A0202, A0403, A0701   |
| 38 | 99-173   | COLUMBIA TELECOM S.A.           | 22 D. MARGARI ST.                               | ATHENS                    | 115 25 | +30210 677 9610/ +30210675 6940             | A0601, A0403, A0101, A 0701, A 0201, A0202, A0301, A0302, A0401, A0402, A1001, A1002, A0604  |
| 39 | 97-011   | COMPULINK NETWORK S.A.          | 44 SINGROU AVE.                                 | ATHENS                    | 117 42 | +30210 928 2700/ +30210 924 9801            | A0701, A0101, A0201, A0202, A0301, A0302, A0401, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0603, A0604, A0605, A0606, A0607, A0901, A1001, A1002, A1101, A1102, A1103, A1202, B0103, B0104, C0101, C0201, C0202, C0204 |



| No | REG. NO. | DISTINCTIVE TITLE                 | ADDRESS                          | CITY               | PC     | TEL./FAX                            | SERVICES UNDER THE GENERAL AUTHORISATION   |
|----|----------|-----------------------------------|----------------------------------|--------------------|--------|-------------------------------------|--|
| 40 | 96-015   | COMPUTER LAB - DIKTYO             | 8 PR. CHRISTOFOROU ST.           | SERRES             | 621 00 | +30232 102 0551/ +30232 105 2185    | A0701  |
| 41 | 98-025   | COMPUTER SCIENCE                  | 3 OCTOBER 28 <sup>th</sup> ST.   | ARGOS              | 212 00 | +30275 102 4141/+30275 102 2566     | A0701  |
| 42 | 00-010   | COM-TO NET S.A.                   | 13 EGIDON ST. & SENEKA ST.       | N. KIFISSIA        | 145 64 | +30210 624 9600/ +30210 625 3761    | A0202, A0701, A0201, A0301, C0101, C0204, C0205, C0303, C0402  |
| 43 | 97-013   | COSMOLINE S.A.                    | 47 AG. KOSTANTINOU ST.           | MAROUSSI           | 151 24 | +30210 812 6000/ +30210 812 6100    | A0301, A0604, A0601, A0701, A1001, A1002, A1202, C0204   |
| 44 | 01-236   | COSMO-ONE HELLAS<br>(MARKET SITE) | 453 MESOGEION AVE.               | AG.PARASKEVI       | 153 42 | +30210 601 9040/ +30210 601 9042    | A0402, A0404, A0701  |
| 45 | 01-274   | COSMOS COMPUTERS S.A.             | 73 VRILISSOU ST.                 | ATHENS             | 114 76 | +30210 649 2800/ +30210 646 4069    | A0101, A0201, A0401, A0501, A0603, A0604, A0605, A0701   |
| 46 | 97-001   | COSMOTE S.A.                      | 44 KIFISSIAS AVE.                | MAROUSSI           | 151 25 | +30210 617 7777/ +30210 617 7384    | A0601, A0604, A0202, A0401, A1001, A0301, A0701, A1102   |
| 47 | 98-004   | DALLAS INFORMATION SYSTEMS        | 11 BAKAGIANNI ST.                | IGOUMENITSA        | 461 00 | +30266 502 3674/ +30266 502 2317    | A0701  |
| 48 | 96-001   | DATABANK                          | 64B KIFISSIAS AVE.               | MAROUSSI           | 151 25 | +30210 615 5200/ +30210 615 5222    | A0604, A1102   |
| 49 | 00-009   | DATAWAYS HELLAS S.A.              | 85 NOVEMBER 17 <sup>th</sup> ST. | THESSALONICA       | 543 52 | +30231 095 3953/ +30231 095 3963    | A0701  |
| 50 | 98-033   | DEFENDER GROUP S.A.               | 30 SINGROU ST.                   | THESSALONICA       | 546 30 | +30231 054 1901/ +30231 053 7065    | A0701, A0401   |
| 51 | 01-248   | DEPA S.A.                         | 207 MESSOGION AVE.               | ATHENS             | 115 25 | +30210 679 3500/ +30210 674 9504    | A0101, A0201, A0301, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0801, A0802, A0803, A0901, A1001, A1002, A1101, A1102, A1201 |
| 52 | 01-019   | DETECARD SERVICE                  | ALLERSBERGER STRASSE 130         | NURNBERG - GERMANY | 904 61 | +49 9114303,-3900/ +49 9114303 2009 | A1001  |
| 53 | 96-021   | DIAVLOS PLIROFORIKI               | 15 E. SOFOULI ST.                | SAMOS              | 831 00 | +30227 302 8521/ +30231 045 6376    | A0701  |
| 54 | 99-199   | DIONI S.A.                        | 31 AKADIMIAS ST.                 | ATHENS             | 106 72 | +30210 338 3500/ +30210 338 3510    | A0302, A0301, A0303, A0403, A0701  |
| 55 | 99-167   | DOMI PLIROFORIKI S.A.             | 55 DODEKANISSOU ST.              | PIRAEUS            | 185 40 | +30210 422 4959/ +30210 413 7123    | A0401, A0701   |
| 56 | 03-061   | DOTSOFT                           | 63 MITROPOLEOS ST.               | THESSALONICA       | 546 23 | +30231 027 4566/ +30231 027 4290    | A0401, A0404, A0701  |
| 57 | 96-024   | E.E.X.I.                          | 56-58 CH. TRIKOUPH ST.           | ATHENS             | 106 80 | +30210 363 3650/ +30210 363 3107    | A0701, A0401   |
| 58 | 99-160   | ECONOPHONE HELLAS S.A.            | 41 ATHINAS AVE.                  | VOULIAGMENI        | 166 71 | +30210 967 0733/ +30210 967 0442    | A0101, A0201, A0301, A0302, A0405, A0406, A0501, A0503, A0602, A0603, A0604, A0605, A0606, A0607, A0901, A1002, A1101, A1102, A1201, C0101, C0204, C0205, C0302, C0303, A0401, A0402, A0403, A0601, A0701, A1001   |
| 59 | 01-010   | EDISINET S.A.                     | 46 PATISSION ST.                 | ATHENS             | 108 62 | +30210 822 0054/ +30210 821 7663    | A0101, A0201, A0301, A0401, A0603, A0605, A0607, A0701, A0901  |



| No | REG. NO. | DISTINCTIVE TITLE                    | ADDRESS                                | CITY          | PC     | TEL./FAX                           | SERVICES UNDER THE GENERAL AUTHORISATION   |
|----|----------|--------------------------------------|--|---------------|--------|------------------------------------|--|
| 60 | 96-022   | ELEA LTD.                            | 50-52 VALTETSIU ST.                    | ATHENS        | 106 81 | +30210 380 2335/ +30210 380 6770   | A0604, A0701   |
| 61 | 98-029   | ENTELECHIA LTD.                      | 15 DITIKIS THRAKIS ST.                 | SERRES        | 621 24 | +30232 105 7518/ +30232 105 7519   | A0701  |
| 62 | 96-029   | ENTERNET                             | 18 AMALIADOS ST.                       | ATHENS        | 115 24 | +30210 647 0800/ +30210 647 0803   | A0401, A0701   |
| 63 | 96-014   | EQUANT LTD.                          | 16 KIFISSIAS AVE.                      | MAROUSSI      | 151 25 | +30210 688 2800/ +30210 680 1561   | A0604  |
| 64 | 00-024   | EQUINOX D.R. LTD.                    | 22 KANARI ST.<br>& 34 DIMOSTHENOUS ST. | AG. PARASKEVI | 153 43 | +30210 601 5900/ +30210 600 4400   | A0701, A0401, A1001  |
| 65 | 01-265   | E-SAT S.A.                           | 109 AMFITHEAS AVE.                     | P. FALIRO     | 175 63 | +30210 985 8126-9/ +30210 985 3671 | A0101, A0201, A0202, A0301, A0401, A0405, A0501, A0602, A0701, A0802, A0901, C0101, C0201, C0204, C0205, C0301, C0303, C0403   |
| 66 | 98-023   | ETHNODATA S.A.                       | 12 THESSALONIKIS ST.                   | MOSCHATO      | 183 46 | +30210 480 6812/ +30210 480 6815   | A0701  |
| 67 | 01-021   | E-TONE S.A.                          | 10 ARKADIOU ST.                        | MAROUSSI      | 151 24 | +30210 614 6405/ +30210 614 6233   | A0201, A0301, A0401, A0403, A0501, A0601, A0602, A0605, A0701, A0901, A1001, A1002, A1101, B0103, B0104, B0301   |
| 68 | 99-161   | EURO-LINK<br>TELECOMMUNICATIONS S.A. | 9 V. FAVI ST.                          | PSICHIKO      | 115 25 | +30210 672 7278/ +30210 672 7578   | A0101, A0201, A0302, A0401, A0501, A0502, A0604, A1001, A1002, A1101, A0301, A0601, A0701  |
| 69 | 01-005   | EUROPROM<br>TELECOMMUNICATIONS S.A.  | 209 KIFISSIAS AVE.                     | MAROUSSI      | 151 24 | +30210 614 1106/ +30210 809 7620   | A0101, A0201, A0301, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0801, A0802, A0803, A0901, A1001, A1002, A1101, A1102, A1201 |
| 70 | 96-020   | EVRIPOS NET S.A.                     | 4 ATHINAS ST.                          | CHALKIDA      | 341 00 | +30222 108 4630/ +30222 108 2698   | A0701  |
| 71 | 00-006   | EXONET S.A.                          | 15-17 TSOCHA ST.                       | ATHENS        | 115 21 | +30210 649 0000/ +30210 646 5612   | A0601, A0701, A0401, A0202, A0501, A0502, A0901, A1001, A1002, A0301, A0403, A0604   |
| 72 | 00-002   | EXPRESSNET                           | 91 GIANNITSON ST.                      | THESSALONICA  | 546 27 | +30231 053 7137/+30231 054 5358    | A0701, A0401   |
| 73 | 01-250   | EXTRA LINE LTD.                      | 7 DODEKANISSOU ST.                     | THESSALONICA  | 546 26 | +30231 059 0400/ +30231 059 0405   | A0401, A0901, A1102, A1103   |
| 74 | 96-036   | FASTNET S.A.                         | 6 PATROKLOU ST.<br>& ANDROMACHIS ST.   | MAROUSSI      | 151 25 | +30210 682 9035/ +30210 682 9036   | A0401, A0701   |
| 75 | 03-038   | FILIKI DIADIKTYAKI S.A.              | 46 PANEPISTIMIOU ST.                   | ATHENS        | 106 78 | +30210 330 6016/ +30210 330 6018   | A0701  |
| 76 | 03-054   | FINE<br>TELECOMMUNICATIONS LTD.      | 18A SAMIS ST.                          | ANO PATISSIA  | 111 42 |                                    | A1001, A1002   |
| 77 | 01-009   | FIRST TELECOM LTD.                   | 69 VATAZI ST.                          | ATHENS        | 114 73 | +30210 644 1354/ +30210 645 9787   | A0101, A0201, A0301, A0302, A0303, A0401, A0403, A0410, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A1001, A1002, A1101, A1102, A1201  |
| 78 | 01-289   | FLAG TELECOM HELLAS                  | 5 LIVINI ST.                           | ATHENS        | 114 71 | +30210 727 9066/ +30210 727 9190   | A0101, A0201, A0202, A0301, A0302, A0401, A0601, A0602, A0603, A0605, A0606, A0701   |



| No | REG. NO. | DISTINCTIVE TITLE                 | ADDRESS                           | CITY         | PC     | TEL./FAX                         | SERVICES UNDER THE GENERAL AUTHORISATION   |
|----|----------|-----------------------------------|-----------------------------------|--------------|--------|----------------------------------|--|
| 79 | 02-021   | FONOTEL S.A.                      | 55 TENEDOU ST.                    | ATHENS       | 113 61 | +30210 866 5130/ +30210 866 5130 | A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A1001, A1002   |
| 80 | 01-280   | FORTH-CRS                         | 3 ARGIROUPOLEOS ST.               | ARGIROUPOLI  | 164 51 | +30210 955 9280/ +30210 955 9289 | A0202, A0301, A0302, A0401, A0602, A0603, A0604, A0605, A0701, A0901   |
| 81 | 99-204   | FORTHE-COM                        | 4 ATTHIDON ST.                    | KALLITHEA    | 176 71 | +30210 955 9300/ +30210 955 9333 | A0402, A0401, A0901, A0301, A0404  |
| 82 | 99-211   | FORTHLINK S.A.                    | 129 STR. DAGLI ST.                | ATHENS       | 111 45 | +30210 854 2604/ +30210 854 2604 | A0701, A0401   |
| 83 | 97-004   | FORTHNET S.A.                     | 4 ATTHIDON ST.                    | KALLITHEA    | 176 71 | +30210 955 9000/ +30210 955 9444 | A0601, A0701, A0202, A0301, A0302, A0401, A0402, A0403, A0602, A0603, A0604, A0605, A0901, A1002, A0201, A0303, A0404, A0405, A0501, A0502, A0503, A0606, A0607, A1001, A1101, A1102, A1103, A0101 |
| 84 | 99-163   | FREE PHONE HELLAS                 | 3 MIAOULI ST.                     | THESSALONICA | 546 42 | +30231 081 3950/ +30231 088 7922 | A0301, A0403, A0601  |
| 85 | 98-031   | G.T. - GREEK TELECOM S.A.         | 31 AKADIMIAS ST.                  | ATHENS       | 106 72 | +30210 338 3500/ +30210 338 3510 | A0101, A0601, A0604, A0701, A1001  |
| 86 | 98-008   | GALILEO HELLAS S.A.               | MISTRA ST. & 31 <sup>st</sup> ST. | ELLINIKO     | 167 77 | +30210 893 1700/ +30210 963 4566 | A0402, A0404, A0604, A0403, A0101, A0201, A0202, A0301, A0401, A0601, A0603, A0605, A1001, A1002   |
| 87 | 99-182   | GATEWAY TELECOMMUNICATIONS S.A.   | 362 KIFISSIAS AVE.                | CHALANDRI    | 152 33 | +30210 811 8100/ +30210 684 8068 | A0601, A0604   |
| 88 | 97-002   | GIANNOPOULOS G. - VOUTSIS I. & CO | 5 KEFALA ST.                      | KALAMATA     | 241 00 | +30272 102 7931/ +30272 109 5020 | A0701  |
| 89 | 97-006   | GLOBAL ONE HELLAS S.A.            | 62 KIFISSIAS AVE.                 | MAROUSSI     | 151 25 | +30210 619 8951/ +30210 619 8957 | A0301, A0401, A0402, A0403, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701   |
| 90 | 01-006   | GLOBAL TELELINK LTD. (GTL)        | 5 VILARA ST.                      | ATHENS       | 104 37 | +30210 520 2989/ +30210 520 2987 | A0601, A0403, A1001  |
| 91 | 97-007   | GRAPES HELLAS S.A.                | 12 ZISSIMOPOULOU ST.              | ATHENS       | 115 24 | +30210 698 7200/ +30210 698 7105 | A0202, A0303, A0402, A0601, A1001, A0301, A0401, A0403, A0701  |
| 92 | 99-175   | GRECIANNET                        | 101 KISSAMOU ST.                  | CHANIA       | 731 31 | +30282 109 7554/ +30282 107 6263 | A0701, A0401   |
| 93 | 03-037   | GREECECALL S.A.                   | 25 ILISSION AVE. & DIMITROS ST.   | N. KIFISSIA  | 145 64 | +30210 807 9709/ +30210 807 9118 | A0403, A0406, A0407, A0501, A0502, A0901, A1001, A1002, A1101, A1102, A1103, B0103, B0104, B0201, C0203, C0205, C0301, C0302, C0303  |
| 94 | 99-196   | GREVENA CHAMBER NET               | 5 E. PAPPAS ST.                   | GREVENA      | 511 00 | +30246 202 5110/ +30246 208 0310 | A0701  |
| 95 | 96-041   | GROOVY PRODUCTIONS                | 24 P. TSALDARI ST.                | MELISSIA     | 151 27 | +30210 613 4444/ +30210 803 2562 | A0701  |
| 96 | 96-035   | GROUP 3 S.A.                      | 37 P. GRIGORIOU E' ST.            | THESSALONICA | 542 48 | +30231 032 4440/ +30231 030 8829 | A0701  |
| 97 | 97-010   | HELLAS NET                        | 4 ATTHIDON ST.                    | KALLITHEA    | 176 71 | +30210 955 9500/ +30210 955 9555 | A0301, A0403, A0402, A0701, A0401  |



## APPENDICES

| No  | REG. NO. | DISTINCTIVE TITLE  | ADDRESS  | CITY         | PC     | TEL./FAX                         | SERVICES UNDER THE GENERAL AUTHORISATION   |
|-----|----------|--|--|--------------|--------|----------------------------------|--|
| 98  | 97-003   | HELLAS ON LINE   | 59-61 AG. KONSTANTINOU ST.<br>BUILDING B         | MAROUSSI     | 151 24 | +30210 876 2000/ +30210 805 6790 | A0201, A0202, A0301, A0501, A0802, A0803, A0901, A1001, A1002, A1101, A1103, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0502, A0503               |
| 99  | 99-176   | HELLASFON NETWORKS S.A.                                    | 97 KANTANOU ST.                                  | HERAKLIO     | 713 03 | +30281 037 0370/ +30281 026 2621 | A0201, A0202, A0301, A0403, A0601, A0701, A1001  |
| 100 | 01-284   | HIT S.A.   | 180 KIFISSIAS AVE.                               | CHALANDRI    | 152 31 | +30210 950 4780/ +30210 950 4781 | A0201, A0202, A0301, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0601, A0701, A1001  |
| 101 | 01-258   | HUB  | 75 TATOIOU AVE.                                  | KIFISSIA     | 145 64 | +30210 620 0035/ +30210 620 7331 | A0401, A0701, A1002  |
| 102 | 98-041   | HYPERNET LTD.  | 57 ERMOU ST.                                     | THESSALONICA | 546 23 | +30231 027 9659/ +30231 027 9858 | A0701, A0401   |
| 103 | 00-001   | HYPERTECH S.A.   | 125-127 KIFISSIAS AVE.                           | MAROUSSI     | 115 24 | +30210 699 6072/ +30210 699 5450 | A0201, A0402, A0604, A0701, A0101, A0301, A0403, A0901   |
| 104 | 98-039   | I.I.S. S.A.  | 72-74 SALAMINOS ST.                              | KALLITHEA    | 176 75 | +30210 957 6695/ +30210 957 0889 | A0701, A0401   |
| 105 | 98-002   | IDEAL ACROPOLIS  | 17 SAPFOUS ST.                                   | KALLITHEA    | 176 76 | +30210 957 2720/ +30210 957 0111 | A0401, A0604, A0701  |
| 106 | 97-018   | IDEAL TELECOM S.A.   | 190 SINGROU AVE.                                 | KALLITHEA    | 176 71 | +30210 956 2551/ +30210 957 9094 | A0601, A0701, A0603, A0605, A1001, A1002, A1103, C0101, C0201, C0204, A0401, A0201, A0202, A0301, A0602, A0604, A0606, A1101, A1201  |
| 107 | 01-254   | IKE-ATHINA   | 44 PANEPSTIMIOU ST.                              | ATHENS       | 106 79 | +30210 338 7702/ +30210 364 6392 | A0401, A0701   |
| 108 | 99-164   | INCREDIBLE NETWORKS  | 20 KAREA ST.                                     | ATHENS       | 116 36 | +30210 921 2312/ +30210 921 0855 | A0401, A0701   |
| 109 | 01-253   | INET HELLAS LTD.   | 88 SEPTEMBER 3 <sup>rd</sup> ST.                 | ATHENS       | 104 34 | +30210 821 7460/ +30210 822 9740 | A0701, A0901, A1002  |
| 110 | 01-257   | INFO QUEST S.A.  | 25-27 AL. PANTOU ST.                             | KALLITHEA    | 176 71 | +30211 999 3000/ +30211 999 3001 | A0101, A0201, A0202, A0301, A0302, A0401, A0402, A0403, A0411, A0501, A0502, A0503, A0601, A0603, A0604, A0605, A0606, A0607, A0701, A0901, A1001, A1002, A1101, A1103, A1201, B0101, B0102, B0103, B0104, B0201, B0301, B0401, B0501, C0203 |
| 111 | 97-027   | INFOGROW LTD.  | 17 M. BOTSARI ST.                                | LIKOVRISSI   | 141 23 | +30210 283 4845/ +30210 283 4863 | A0701  |
| 112 | 97-025   | INTELCO  | 11 THERMOPILON ST.<br>& MAKEDONIAS ST.           | CHALANDRI    | 152 33 | +30210 689 4610/ +30210 689 4608 | A0401, A0402, A0404, A0406, A0407, A0409, A0411, A0403, A0405, A0408, A0410, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701  |
| 113 | 00-005   | INTERCONNECT LTD.  | 10-16 MINOOS ST.                                 | N. KOSMOS    | 117 43 | +30210 929 6741/ +30210 929 6741 | A1002, A0701   |
| 114 | 03-018   | INTERGAME  | 70 GERASIMOU MARKORA                             | KERKYRA      | 491 00 | +30266 103 6623/ +30266 104 5532 | A0101  |
| 115 | 00-032   | INTERNATIONAL AIRPORT ATHENS S.A.<br>ELEFTHERIOS VENIZELOS | INTERNATIONAL AIRPORT<br>ADMINISTARTION BUILDING | SPATA        | 190 19 | +30210 353 6415/ +30210 353 7782 | A0301, A0202, A0701, A1001   |



| No  | REG. NO. | DISTINCTIVE TITLE   | ADDRESS                               | CITY         | PC      | TEL./FAX                         | SERVICES UNDER THE GENERAL AUTHORISATION  |
|-----|----------|---|---------------------------------------|--------------|---------|----------------------------------|---|
| 116 | 99-170   | INTERNET HELLAS S.A.  | 92 AMAROUSIOU<br>CHALANDRIOU AVE.     | ATHENS       | 151 25  | +30210 811 3000/ +30210 811 3399 | A0406, A0408, A0410, A0411, A0502, A0601, A0603, A0701, A0101, A0301, A0403, A0201, A0202, A0401, A0405, A0407, A0409, A0501, A0503, A0602, A0604, A0605, A0801, A0802, A0803, A0901, A1002, A1101, A1103 |
| 117 | 00-033   | INTERNET Q S.A.   | 17 TRIAS ST.                          | ATHENS       | 112 57  | +30210 884 1141/ +30210 884 1176 | A0401, A0701, A1102, A0201, A0501   |
| 118 | 99-188   | INTERSAT S.A.   | 362 KIFISSIAS AVE.                    | CHALANDRI    | 152 33  | +30210 811 8100/ +30210 811 8112 | A0301, A0601, A0701, A1001, A0401   |
| 119 | 03-027   | INTERWORKS  | 60 VRILISSOU ST.                      | ATHENS       | 114 76  | +30210 640 0437/ +30210 647 1048 | A0401, A0405, A0701   |
| 120 | 99-171   | INTRACONNECT S.A.   | 5 KLISSOURAS ST.<br>& TATOIOU AVE.    | METAMORFOSSI | 144 52  | +30210 285 5830/ +30210 285 5839 | A1001, A1002, A1101, A1102, A1103, A1201, A0301, A0701, A0101, A0201, A0202, A0302, A0401, A0405, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0901                      |
| 121 | 01-273   | INTRASTET LTD.  | 19 MANDILARA ST.                      | LARISSA      | 412 22  | +30241 028 6609/ +30241 053 4433 | A0201, A0603, A0604, A0605, A0901, A1002, B0104, C0101  |
| 122 | 01-231   | ISA   | 8 P. TSALDARI ST.                     | MELISSIA     | 151 27  | +30210 803 7240/ +30210 804 2153 | A0101, A0301, A0302, A0409, A0601, A0602, A0603, A1001, A1002, A1201  |
| 123 | 95-002   | ITEL LTD.   | 409 VOULIAGMENIS AVE.                 | ILIOUPOLI    | 163 46  | +30210 979 0050/ +30210 979 0051 | A0701, A0401  |
| 124 | 01-245   | IXNET UK LIMITED  | QUEEN VICTORIA 63                     | LONDON-UK    | EC4N4ST | +30210 683 7520/ +30210 685 6658 | A0601   |
| 125 | 96-025   | KAINOURGIOS DIMITRIOS   | 85 MARATHONODROMOU ST.                | MAROUSSI     | 151 25  | +30210 802 6506/ +30210 802 6655 | A0604   |
| 126 | 96-030   | KAPA-PHONE S.A.   | 39 HALANDRIOY AVE.                    | MAROUSSI     | 151 25  | +30210 610 6006/ +30210 610 6005 | A1102   |
| 127 | 01-252   | KARAVAGGELIS DIMITRIOS  | 10 km DRAMAS-<br>KAVALAS NATION. ROAD | DOXATON      | 663 00  | +30252 106 8971/ +30252 105 5480 | A1102   |
| 128 | 96-004   | KENTRO ELEKTRONIKON<br>YPOLOGISTON (ELECTRONIC<br>COMPUTERS CENTER) | 8 X. KARAPANAGIOTI ST.                | MITILINI     | 811 00  | +30225 102 8791/ +30225 104 3150 | A0701, A0604  |
| 129 | 02-012   | KINETIX TELE. COM   | 4 AGN. STRATIOTI ST.                  | THESSALONICA | 546 31  | +30231 025 6140/ +30231 025 6140 | A1001, A1002  |
| 130 | 97-023   | KYT-NET   | 5 PANOS ST.                           | TRIPOLI      | 221 00  | +30271 022 5151/ +30271 023 3072 | A0701   |
| 131 | 99-205   | LAN-NET S.A.  | I KONSTANTINOPOLEOS<br>& KIFISSOY ST. | PERISTERI    | 121 32  | +30210 570 8300/ +30210 570 8322 | A0101, A0201, A0202, A0302, A0403, A0405, A0501, A0503, A0602, A0603, A0604, A0605, A0606, A0901, A1002, A1101, A1102, A1201, C0101, C0302, C0303, A0601, A1001, A0301, A0701                             |
| 132 | 01-230   | LEMONTEL.COM S.A.   | 100 KIFISSIAS AVE.                    | ATHENS       | 115 26  | +30210 698 4665/ +30210 699 0809 | A0301, A0401, A0402, A0601, A0604, A0605, A0606, A0701, A1001, A1002  |
| 133 | 98-001   | LEXITEL S.A.  | I BENAKI ST. & AG. NEKTARIOU ST.      | CHALANDRI    | 152 35  | +30210 606 9500/ +30210 606 9510 | A1102   |
| 134 | 96-019   | LINE COMPUTERS  | I-3 P. MELA ST.                       | FLORINA      | 531 00  | +30238 502 5809/ +30238 504 4170 | A0701   |



| No  | REG. NO. | DISTINCTIVE TITLE  | ADDRESS                                    | CITY                   | PC     | TEL./FAX                               | SERVICES UNDER THE GENERAL AUTHORISATION   |
|-----|----------|--|--|------------------------|--------|--|--|
| 135 | 00-014   | LINK   | 9km THESSALONIKIS -THERMIS ROAD            | THERMI                 | 570 01 | +30231 048 9390/ +30231 048 9394       | A0101, A0201, A0302, A0401, A0501, A0502, A0604, A1001, A1002, A1101, A0601, A0701, A0403, A0301, A0601, A0202, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0503, A0603, A0605, A0606, A0607, A0901, A1002, A1102, A1103, A1202, B0103, B0104, C0101, C0201, C0202, C0204 |
| 136 | 96-012   | LINK S.A.  | 6 M. ALEXADROU ST.                         | KATERINI               | 601 00 | +30235 107 6916/ +30235 107 6916       | A0301, A0401, A0701  |
| 137 | 00-191   | LINX   | 23-25 ALASTOROS ST.                        | ATHENS                 | 115 22 | +30210 645 1333/ +30210 643 2495       | A1001  |
| 138 | 01-246   | MAKNAN S.A.  | 57 ALEXANDRAS AVE.                         | ATHENS                 | 114 73 | +30210 647 0350/ +30210 647 0352       | A1102  |
| 139 | 01-023   | MAMALAKIS IOANNIS S.A.                                   | 13 ETHNIKIS AMINIS ST.                     | THESSALONICA           | 546 21 | +30231 024 4336/ +30231 028 7898       | A0101, A0201, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411  |
| 140 | 01-266   | MANIATEAS ILIAS EKDOTIKES EPIXEIRISEIS S.A. (PUBLISHING) | 166 IONIAS AVE.                            | ATHENS                 | 111 44 | +30210 211 4630                        | A1102  |
| 141 | 96-007   | MBN S.A. MEDITERRANEAN BUSINESS NETWORK                  | 56 AG. IOANNOU ST.                         | AG. PARASKEVI          | 153 42 | +30210 600 6696/ +30210 639 0565       | A0701, A0401   |
| 142 | 01-251   | MCC  | 13 HEIER ST.                               | LICHTENAU-ATTELDENMARK | D-3316 | +49 5292 98630/ +49 5292 2922          | A0401, A1102   |
| 143 | 00-017   | MCI WORLDCOM (HELLAS) ONE MAN LTD.                       | 35 JOHN KENNEDY ST.                        | KESSARIANI             | 161 21 | +30210 729 7550/ +30210 720 9495       | A0301  |
| 144 | 96-018   | MEDIATEL S.A.  | 10-16 MINOOS ST.                           | N. KOSMOS              | 117 43 | +30210 929 6121/ +30210 902 8596       | A1102  |
| 145 | 01-002   | MEDITERRANEAN BROADBAND ACCESS S.A.                      | 4 ATTHIDON ST.                             | KALLITHEA              | 176 71 | +30210 955 9050/ +30210 955 9055       | A0101, A0201, A0202, A0301, A0302, A0601, A0602, A0603, A0605, A1001   |
| 146 | 01-287   | MEDITERRANEAN NAUTILUS GREECE S.A.                       | SOKRATOUS ST. & 2 KIPROU ST.               | MELISSIA               | 151 27 | +30210 810 2633-5/<br>+30210 803 0555  | A0101, A0201, A0202, A0301, A0302, A0501, A0603, A0604, A0605, A0901, A1202  |
| 147 | 01-300   | MEDITERRANEAN NAUTILUS LTD.                              | INTERNATIONAL HOUSE 3, HARBOURMASTER PLACE | IFSC, DUBLIN I IRELAND |        | +35 314359700/ +35 314359700           | A0101, A0201, A0202, A0301, A0302, A0603, A0604 A0605  |
| 148 | 98-038   | MEGA INTERNATIONAL GREECE LTD.                           | 30 VAKCHOU ST.                             | THESSALONICA           | 546 29 | +30231 050 0710-30/<br>+30231 054 0520 | A1102  |
| 149 | 00-007   | MLS INFORMATION TECHNOLOGY S.A.                          | 79 NOVEMBER 17th ST.                       | PILEA THESSALONIKIS    | 544 54 | +30231 092 9090/ +30231 093 7222       | A0601, A1001, A0701  |
| 150 | 00-028   | MULTICOM S.A.  | 209 KIFISSIAS AVE.                         | MAROUSSI               | 151 24 | +30210 614 1106/ +30210 809 7721       | A0101, A0201, A0301, A0402, A0403, A0404, A0501, A0502, A0503, A0604, A0701, A0802, A0901, A1002, A1103, A0401   |
| 151 | 01-235   | MULTIDATA S.A.   | 41-45 MARINOU ANTIPA ST.                   | N. HERAKLIO            | 141 21 | +30210 270 5340/ +30210 270 5398       | A1102, A1103   |



| No  | REG. NO. | DISTINCTIVE TITLE                | ADDRESS                    | CITY             | PC     | TEL./FAX                           | SERVICES UNDER THE GENERAL AUTHORISATION   |
|-----|----------|----------------------------------|----------------------------|------------------|--------|------------------------------------|--|
| 152 | 98-037   | MUNICIPALITY OF SKIATHOS         | 12 NIKOTSARA ST.           | SKIATHOS         | 370 02 | +30242 702 2240/ +30242 702 3150   | A0701  |
| 153 | 01-015   | M-WEB S.A.                       | MANIS KANTZA               | PALLINI          | 153 51 | +30210 660 2200/ +30210 604 1610   | A0201, A0202, A0401, A0604, A0701, A1002, A1101, A1102, B0102, B0103, B0301  |
| 154 | 01-018   | NEA PILI S.A.                    | 25-29 KARNEADOU ST.        | ATHENS           | 106 75 | +30210 725 4464/ +30210 725 4637   | A0101, A0201, A0202, A0301, A0302, A0401, A0402, A0404, A0405, A0407, A0501, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A1001, A1002, A1103  |
| 155 | 99-181   | NET CAFÉ                         | 10 SPILIADOU ST.           | PREVEZA          | 481 00 | +30268 202 7230                    | A0701  |
| 156 | 00-030   | NET ON LINE                      | 18 PANEPISTIMIΟΥ ST.       | ATHENS           | 106 72 | +30210 333 3555/ +30210 324 6850   | A0701, A0301, A0401  |
| 157 | 99-202   | NET ONE S.A.                     | 2 PERIKLEOUS ST.           | N. PSICHIKO      | 154 51 | +30210 678 1300/ +30210 678 1390   | A0401, A0301, A0701, A0202, A0601  |
| 158 | 98-042   | NETEPLAN LTD.                    | 46 SOLOMOU ST.             | ATHENS           | 106 82 | +30210 330 0793/ +30210 380 1223   | A0401, A0101, A0201, A0301, A0302, A0501, A0604, A0605, A0901, A0701   |
| 159 | 03-028   | NETMODE                          | 1 G. SEFERI                | DAFNI            | 172 34 | +30210 970 0099/ +30210 975 6858   | A0401, A0701   |
| 160 | 03-045   | NEW GROSS TV HELLAS S.A.         | 79 KILKIS                  | POLYKASTRO       | 612 00 | +30234 304 1405/ +30234 302 5616   | A0701  |
| 161 | 96-027   | NEWSPHONE HELLAS S.A.            | 280 THISSEOS AVE.          | KALLITHEA        | 176 75 | +30210 947 2222/ +30210 947 2223   | A1102  |
| 162 | 97-015   | NIKOLETOPOULOS A.                | 13 PERLIAS ST.             | POROS TROIZINIAS | 180 20 | +30229 802 6255                    | A0701  |
| 163 | 01-267   | NONDAS I.N.S.                    | AVE. DU CONDOR 25          | BRUXELLES        | 10 80  | +32 495536988/ +32 974638857       | A0101, A0201, A0301, A0601, A0602, A0603, A0604, A0605, A0606, A0701, A1001, A1002, A1201, A1607   |
| 164 | 01-233   | NONDAS I.N.S. TELECOM            | 181 DIMOSTHENOUS ST.       | KALLITHEA        | 176 75 | +30210 953 7226/ +30210 953 7224   | A0101, A0201, A0301, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A1001, A1002, A1201   |
| 165 | 02-080   | NOVA MEDIA LTD.                  | 16 FERRON                  | ATHENS           | 104 34 | +30210 884 1470/ +30210 884 1838   | A1102  |
| 166 | 99-180   | NYX INTERNET                     | 14 MPOUMPOULINAS           | ATHENS           | 106 82 | +30210 383 9044-5/ +30210 383 9044 | A0701  |
| 167 | 01-285   | OK S.A.                          | 148 DOIRANIS ST.           | KALLITHEA        | 176 43 | +30210 953 1600/ +30210 957 8784   | A0701, A0901, A1002, A1101   |
| 168 | 00-036   | OLYMPUS NET LTD.                 | 14 P. TSALDARI ST.         | KATERINI         | 601 00 | +30235 107 7316/ +30235 107 7576   | A0701  |
| 169 | 01-024   | OMEGANET S.A.                    | 11 SIFNEON AGIOPLASTON ST. | MAROUSSI         | 151 25 | +30210 610 6060/ +30210 618 0579   | A0701, A0401   |
| 170 | 96-039   | OMILOS KALOFOLIA S.A.<br>(GROUP) | 39 CHALANDRIOU ST.         | MAROUSSI         | 151 25 | +30210 610 6006/ +30210 610 6005   | A0301, A0302, A0604, A0701, A0401  |
| 171 | 99-190   | ORGANOTIKI COMPUTERS CO          | 30 TANTALOU ST.            | THESSALONICA     | 546 29 | +30231 053 3694/ +30231 055 1385   | A0401, A0701   |
| 172 | 01-302   | ORIZONTES                        | 1 PERGAMOY ST.             | N.FILADELΦIA     | 143 41 | +30210 258 8695/ +30210 253 3734   | A1101, A1102, A1103  |
| 173 | 95-001   | OTE                              | 99 KIFISSIAS AVE.          | MAROUSSI         | 151 25 | +30210 611 1000/ +30210 611 7456   | A0101, A0201, A0301, A0302, A0303, A0401, A0402, A0403, A0405, A0406, A0410, A0501, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0801, A0802, A0803, A0901, A1001, A1101, A1102, A1103, A1201, B0101, B0102, B0201, B0301, C 0101, C0201, C0202, C0203, C0204, C0205, C0301, C0302, C0303, C0401, C0402, C0403, C0501 |



| No  | REG. NO. | DISTINCTIVE TITLE                           | ADDRESS  | CITY              | PC     | TEL./FAX                              | SERVICES UNDER THE GENERAL AUTHORISATION   |
|-----|----------|---|--|-------------------|--------|---------------------------------------|--|
| 174 | 02-029   | OTEGLOBE S.A.                               | 99 KIFISSIAS AVE.                              | MAROUSSI          | 151 24 | +30210 611 5400/ +30210 611 5399      | A0101, A0201, A0202, A0301, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0801, A0802, A0803, A0901, A1001, A1002, A1101, A1102, A1103, A1201   |
| 175 | 96-023   | OTENET S.A.                                 | 109 KIFISSIAS AVE. & SINA                      | MAROUSSI          | 151 24 | +30210 615 1600/ +30210 615 1700      | A0202, A0301, A0401, A0409, A0602, A0603, A0604, A0605, A0701, A0901, C0204, A0501, A1002, A1101, A1103, A0407, A0201, A0101, A0601, A1001   |
| 176 | 98-012   | OULASOGLOU I. / ZEUS                        | 10 DIMITRIOU & KARAOLI ST.                     | DRAMA             | 661 00 | +30252 104 7797                       | A0701  |
| 177 | 01-228   | OUTSOURCE S.A.                              | 3 FOKEAS ST.                                   | PIRAEUS           | 185 47 | +30210 489 9320-3/<br>+30210 489 9184 | A0101, A0201, A0202, A0401, A0701  |
| 178 | 01-011   | PALITSKARIS XENOFON                         | 18 20 <sup>th</sup> OCTOBER ST.                | GIANNITSA         | 581 00 | +30238 208 3200/ +30238 202 3733      | A0401, A0604, A0701  |
| 179 | 01-014   | PANATEL S.A.                                | 294 SINGROU AVE.                               | KALLITHEA         | 176 73 | +30210 957 6625/ +30210 957 8750      | A0301, A0603, A0604, A0607, A1001, A1002, A1101, A1102, A1201  |
| 180 | 01-013   | PAPASYNNEFAKIS<br>ATHANASIOS                | 25 SKOUFA ST.                                  | ELASSONA LARISSAS | 402 00 | +30249 302 2120                       | A1102  |
| 181 | 96-013   | PAPAVASILEIOU E. & A. CO                    | 7 PLASTIRA ST.                                 | KARDITSA          | 431 00 | +30244 107 5344/ +30244 107 2344      | A0701, A0401   |
| 182 | 01-294   | PERTHO S.A. RADIO<br>TELEVISION ENTERPRISES | 1 km FILIRO-LAGADA ROAD                        | FILIRO            | 570 10 | +30231 067 8451/ +30231 067 8454      | A0101, A0201, A0301, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0801, A0802, A0803, A0901, A1001, A1002, A1101, A1102, A1103, A1201, A1202, B0101, B0102, B0103, B0104, B0201, B0301, B0501, C0101, C0201, C0202, C0203, C0204, C0205, C0301, C0303, C0401, C0402, C0403 |
| 183 | 01-031   | PETROULAKIS G. S.A.                         | 11 ALEXANDRAS AVE.                             | ATHENS            | 114 73 | +30210 642 9829                       | A0301, A0601, A0701, A1001, A1002, A1101, A1102, A1103, A1201, B0601   |
| 184 | 99-162   | PG COM                                      | 30 AMIKLON ST.                                 | CHALANDRI         | 152 31 | +30210 674 6777/ +30210 674 6446      | A0701  |
| 185 | 01-288   | PLANET LINE                                 | 80 KIPROU ST.                                  | LARISSA           | 412 22 | +30241 053 3193                       | A0401, A0901, A1102  |
| 186 | 01-008   | POLYGRAMMO DIKTYO S.A.                      | 100 KIFISSIAS AVE.<br>& 83 MARATHONODROMOU ST. | ATHENS            | 151 25 | +30210 614 4226/ +30210 614 4231      | A0301, A0701, A1001, A1002, A1101, A1102   |
| 187 | 00-034   | POWERNET                                    | 41-45 MARINOU ANTYP A ST.                      | N. IRAKLIO        | 141 21 | +30210 270 5300/ +30210 270 5399      | A0701  |
| 188 | 02-062   | PREMIUM SERVICES HELLAS<br>ONE-PERSON LTD.  | 15 KIFISSIAS AVE.                              | MAROUSSI          | 151 25 | +30210 689 6761/ +30210 689 6762      | A0101, A0201, A0301, A0302, A0401, A0402, A0403, A0404, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0901, A1001, A1002, A1101, A1102, A1201   |



| No  | REG. NO. | DISTINCTIVE TITLE                          | ADDRESS  | CITY           | PC     | TEL./FAX                         | SERVICES UNDER THE GENERAL AUTHORISATION   |
|-----|----------|--|--|----------------|--------|----------------------------------|--|
| 189 | 02-070   | PRIMUS CALL S.A.                           | 159 G. PAPANDEOU ST.                             | METAMORFOSSI   | 144 52 | +30210 288 8885/ +30210 288 8886 | A1102  |
| 190 | 01-259   | PRIORITY LTD.                              | 19 PENTELIS AVE.                                 | VRILISSIA      | 152 35 | +30210 683 5876/ +30210 683 5895 | A0201  |
| 191 | 98-035   | PRISMA ELECTRONICS S.A.                    | 85 DIMOKRATIAS AVE.                              | ALEXANDROUPOLI | 681 00 | +30255 103 5013/ +30255 103 4916 | A0701, A0401   |
| 192 | 01-283   | PROTO PAGKOSMIO DIKTYO TILIFONIAS-INTERNET | 16 DIOMIDOUS KYRIAKOU ST.                        | KIFISSIA       | 145 62 | +30210 808 9102/ +30210 808 9103 | A1002  |
| 193 | 03-013   | R.G. COMMUNICATIONS S.A.                   | 34 VERANTZEROU ST.                               | ATHENS         | 104 32 | +30210 899 6516/ +30210 899 6519 | A0101, A0201, A0301, A0302, A0401, A0402, A0403, A0404, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0901, A1001, A1002, A1101, A1102, A1201, B0103, B0104   |
| 194 | 98-006   | RAINBOW COMMUNICATIONS                     | 75 ILIA ILIOU ST.                                | ATHENS         | 117 44 | +30210 901 2892/ +30210 901 2540 | A0604, A0701   |
| 195 | 03-020   | S.M.T. S.A.                                | 159 G. PAPANDEOU ST.                             | METAMORFOSSI   | 144 52 |                                  | A1102  |
| 196 | 00-012   | SANYOCOM S.A.                              | 12 <sup>th</sup> km ATHENS-LAMIA RD.             | METAMORFOSSI   | 144 51 | +30210 289 4600/ +30210 289 4672 | A0301, A0403, A0701, A0202, A0601  |
| 197 | 01-304   | SAVVIS EUROPE B.V.                         | 17 VALAORITOU ST.                                | ATHENS         | 106 71 | +30210 369 2800/ +30210 369 2807 | A0202, A0301, A0605, A0701, A0201  |
| 198 | 02-031   | SEND IT S.A.                               | 53 AG. IOANNOU ST.                               | AG. PARASKEVI  | 153 42 | +30210 608 4860/ +30210 608 4861 | A1102, B0103   |
| 199 | 02-066   | SERVICE 800 - TELEPERFORMANCE              | 330 THISSEOS AVE.                                | KALLITHEA      | 176 75 | +30210 940 3373/ +30210 940 3383 | A1102  |
| 200 | 96-002   | SETCOM LTD.                                | 98 AKADIMIAS ST.                                 | ATHENS         | 106 77 | +30210 330 3377/ +30210 382 2039 | A0604  |
| 201 | 97-017   | SITA                                       | SOFOKLEOUS ST. & 101 RIZOUNTOS ST.               | ELLINIKO       | 167 77 | +30210 969 6096/ +30210 969 6030 | A1002, A0605, B0501, A0301, A0601, A0604, A0401, A0402, A0403, A0409   |
| 202 | 99-165   | SOFT-HARD                                  | 21 MARCH 25 <sup>th</sup> ST.                    | PTOLEMAIDA     | 501 00 | +30246 302 2450                  | A0701, A0401   |
| 203 | 00-029   | SPACE LINE S.A.                            | 89 D. GOUNARI                                    | MAROUSSI       | 151 25 | +30210 802 9959/ +30210 802 6324 | A1102  |
| 204 | 97-008   | SPACENET S.A.                              | 308 MESOGEION AVE. & 2 ARKADIOU ST.              | CHOLARGOS      | 155 62 | +30210 650 4244/ +30210 650 4388 | A0701, A0601, A0201, A0202, A0404, A0605, A0901, B0301, C0301  |
| 205 | 95-003   | SPARKNET S.A.                              | 40 MARINOU ANTIPA ST.                            | THESSALONICA   | 570 01 | +30231 047 1222/ +30231 047 6333 | A0701, A0401, A0405, A0411, A0604, A0605, A0901, A0101, A0201, A1002   |
| 206 | 98-019   | STARCOM S.A.                               | 12 FORMIONOS ST.                                 | ATHENS         | 116 34 | +30210 729 2980/ +30210 729 7757 | A0403, A0601, A0701, A1001, A0201, A0202, A0301, A0603   |
| 207 | 99-179   | STARGATE NETWORKS S.A.                     | 3 XANTHOU ST.                                    | GLIFADA        | 166 75 | +30210 898 5200/ +30210 898 5201 | A0401, A0701   |
| 208 | 92-002   | STET HELLAS S.A.                           | 66 KIFISSIAS AVE.                                | MAROUSSI       | 151 25 | +30210 615 8000/ +30210 610 6497 | A0101, A0201, A0401, B0102, B0103, B0104, B0401, A0202, A0701, A1001   |
| 209 | 99-198   | STSNET S.A.                                | 1 <sup>st</sup> km HERAKLIO -MIREs NATIONAL ROAD | HERAKLIO CRETE | 711 10 | +30281 026 3300/ +30281 026 3300 | A0301, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A1001, A1002, A1101, A1102, A1103, A1201, A1202, A0101, A0201, A0701 |



| No  | REG. NO. | DISTINCTIVE TITLE            | ADDRESS                         | CITY          | PC     | TEL./FAX                                | SERVICES UNDER THE GENERAL AUTHORISATION   |
|-----|----------|------------------------------|---------------------------------|---------------|--------|---|--|
| 210 | 02-074   | TARGET LINE                  | 8 ALEXANDRAS AVE.               | ATHENS        | 106 82 | +30210 821 9074/ +30210 822 5381        | A1102  |
| 211 | 01-241   | TARGET LTD.                  | 2 IRODOU ATTIKOU ST.            | THESSALONICA  | 546 25 | +30231 055 3621/ +30231 054 6481        | A0701, A1102   |
| 212 | 98-030   | TASIDIS ARCHONTIS            | 13 DASIOU SQ.                   | ORESTIADA     | 682 00 | +30255 102 8340                         | A0701  |
| 213 | 02-047   | TECHNOPOLIS S.A.             | 2-4 ILIOUPOLEOS ST.             | IMITTOS       | 172 37 | +30210 979 2500/ +30210 979 2528        | A0701, B0103   |
| 214 | 99-194   | TELCOMAT S.A.                | 178 PAPAFI ST.                  | THESSALONICA  | 544 53 | +30231 090 0517/ +30231 091 5504        | A0701, A0401   |
| 215 | 99-177   | TELECOMTE ITALIA S.p.A.      | PIAZZA DEGLI AFFRI 2            | MILAN - ITALY |        | +39 063 6881/ +39 063 688 2965          | A1001  |
| 216 | 96-011   | TELEDATA COMMUNICATIONS      | 4 AMALIADOS ST.                 | AMBELOKIPI    | 115 23 | +30210 646 2254/ +30210 646 2254        | A0301  |
| 217 | 99-186   | TELEDOME S.A.                | 10 FILARETOU ST.& DOIRANIS ST.  | KALLITHEA     | 176 72 | +30210 956 9277/ +30210 956 3882        | A0101, A0501, A0502, A0503, A0603, A0604, A0605, A0606, A0607, A0801, A0802, A0803, A0901 A1002, A1101, A1102, A1103, A1201, B0101, B0102, B0103, B0104, B0201, B0301, B0401, B0501, A0302, A0401, A0602, C0101, A0701, A1001, A0201, A0202, A0301, A0403, A0601   |
| 218 | 99-189   | TELEPASSPORT (HELLAS) S.A.   | 81 PATISSION ST. & 8 HEYDEN ST. | ATHENS        | 104 03 | +30210 820 9000/ +30210 820 9088        | A0401, A0402, A0403, A0601, A1001, A1002, A1101, A0101, A0201, A0202, A0302, A0602, A0603, A0604, A0606, A0901, A1201  |
| 219 | 01-026   | TELESTAND S.A.               | 18 SOLONOS ST.                  | ATHENS        | 106 71 | +30210 360 1436/ +30210 360 1474        | A0101, A0201, A0301, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0801, A0802, A0803, A0901, A1001, A1002, A1101, A1102, A1201, B0101, B0102, B0103, B0104, B0301, C0101, C0201, C0202, C0203, C0204, C0205, C0301, C0302, C0303 |
| 220 | 98-022   | TELESYSTEM HELLAS            | 20 AN. TSOCHA ST.               | ATHENS        | 115 21 | +30210 645 4424/ +30210 645 4252        | A1001, A1002, A1101, A1102, A1103, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411   |
| 221 | 01-004   | TELLAS S.A.                  | 3 NEAPOLEOS ST.                 | MAROUSSI      | 151 23 | +30210 811 3411/ +30210 811 3454        | A0701  |
| 222 | 01-256   | TESAE S.A.                   | 26 CHLOIS ST.                   | ZOGRAFOU      | 157 72 | +30210 748 8705/ +30210 778 0490        | A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0901, A1001, A1002, C0301, C0302, C0303, A0701   |
| 223 | 02-022   | THEMA PUBLICATIONS LTD.      | 31 EPIKOUROU ST.                | ATHENS        | 105 53 | +30210 331 5316/ +30210 324 8363        | A1101, A1102   |
| 224 | 98-027   | THESSALIA ON LINE            | 91 S. SPIRIDI ST.               | VOLOS         | 382 21 | +30242 102 0760/ +30242 103 3291        | A0604, A0701   |
| 225 | 96-016   | THESSALIKI TELEMATICS        | 26 ASKLIPOU ST.                 | TRIKALA       | 421 00 | +30243 107 5758/ +30243 107 5759        | A0701  |
| 226 | 02-018   | TRANSNET COMMUNICATIONS S.A. | 3-5 FILODAMIAS ST.              | ATHENS        | 104 42 | +30210 515 7347-354/<br>+30210 515 7654 | A1102  |
| 227 | 03-021   | TSOLAKIS KOMNINOS DIMITRIOS  | 79-81 SOKRATOUS ST.             | ATHENS        | 104 32 |   | A1102  |

| No  | REG. NO. | DISTINCTIVE TITLE                                    | ADDRESS  | CITY           | PC     | TEL./FAX                           | SERVICES UNDER THE GENERAL AUTHORISATION  |
|-----|----------|--|--|----------------|--------|------------------------------------|---|
| 228 | 00-004   | UNITEL HELLAS S.A.                                   | 152 SEVASTOUPOLEOS ST.                                       | ATHENS         | 115 26 | +30210 950 4780/ +30210 950 4781   | A0301, A0701, A0401, A0403, A0404, A0406, A0408, A0410, A0202, A0601, A1001, A0402, A0405, A0407, A0409, A0411  |
| 229 | 99-185   | URNET SYSTEMS S.A.                                   | 112 EL. VENIZELOU ST.  | ILIOUPOLI      | 163 45 | +30210 992 2922/ +30210 992 3720   | A0301, A0401, A0604, A0901, A1002, A0701  |
| 230 | 00-016   | UUNET HELLAS INTERNET SERVICE PROVIDER M. LTD.       | 452 MESSOGION AVE.   | AGIA PARASKEVI | 153 42 | +30210 809 9917/ +30210 809 9777   | A0701, A0101, A0201, A0202, A0301, A0302, A1001, A1002  |
| 231 | 00-021   | VALKANIKI TILEPIKINONIAKI LTD.                       | 8 KANARI ST.   | PIRAEUS        | 185 38 | +30210 459 9076-7/ +30210 459 9078 | A0301, A0701, A0601, A1001  |
| 232 | 99-193   | VERGINA NETWORK                                      | 12 MITROPOLEOS ST.   | VERIA          | 591 00 | +30233 102 3202/ +30233 106 0007   | A0701, A0401  |
| 233 | 01-017   | VIVODI TELECOMMUNICATIONS S.A.                       | 29-31 DERIGNY ST. & 18 ELPIDOS ST.                           | ATHENS         | 104 34 | +30210 889 3700/ +30210 889 3701   | A0201, A0301, A0302, A0401, A0403, A0501, A0502, A0503, A0601, A0602, A0604, A0605, A0606, A1001, A1002, A1101, A1102, A1201, A0701   |
| 234 | 01-247   | VIZZAVI (HELLAS) S.A.                                | 56 KIFISSIAS AVE. & DELFON ST.                               | MAROUSSI       | 151 25 | +30210 617 3202/ +30210 617 3274   | A0401, A0701, A0901, A1002, A1101, B0102, B0103, B0104, B0201, C0301, C0303, A1102  |
| 235 | 92-001   | VODAFONE   | 44 KIFISSIAS AVE.  | MAROUSSI       | 151 25 | +30210 616 0000/ +30210 616 0001   | A0202, A0301, A0601, A0701, A1001, A0101, A0201, A0604, B0103, B0301, B0401, A1102  |
| 236 | 02-027   | VOICE WEB  | 40 AG. KONSTANTINOY ST. (ATRIUM SHOPPING CENTER, OFFICE A37) | MAROUSSI       | 151 24 | +30210 6196 775/ +30210 617 8140   | A0601, A0602, A0603, A0604, A0605, A0606, A0607, A1101, A1102, A1103, B0102, B0103, B0104   |
| 237 | 99-169   | VOICENET   | 5 PROFITIS ILIAS SQ.   | ATHENS         | 116 35 | +30210 757 3100/ +30210 757 3111   | A0301, A0403, A0601, A0701  |
| 238 | 99-187   | WEB COMMUNICATIONS LTD.                              | 72 28 <sup>ο</sup> OKTOVRIΟΥ ST.                             | N. IONIA       | 142 31 | +30210 272 0006/ +30210 271 4008   | A0403, A1001, A1002, A1101, A1102, A1103  |
| 239 | 98-024   | WEST NET S.A.  | 17 GEROKOSTOPOULOU ST.                                       | PATRA          | 262 21 | +30261 062 4070/ +30261 062 3955   | A0401, A0701  |
| 240 | 00-008   | WESTRA COM INFOCIENCE                                | 39 PERIKLEOUS ST.  | CHOLARGOS      | 155 61 | +30210 653 5522/ +30210 654 6886   | A0101, A0201, A0301, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0801, A0802, A0803, A0901, A1001, A1002, A0701 |
| 241 | 01-016   | WIRELESS GR  | 48 ERECHTHIOY ST.  | ALIMOS         | 174 55 | +30210 960 0621/ +30210 964 8677   | A0701   |
| 242 | 01-282   | WORLD STATE LINE M LTD.                              | 90 CHR. SMIRNIS ST.  | MOSCHATO       | 183 45 | +30210 941 1150/ +30210 948 4150   | A0201, A1001, A1002, A1102  |
| 243 | 00-022   | WVA  | 2 ERGATON TIPOY ST.  | ILIOUPOLI      | 163 46 | +30210 995 9063/ +30210 995 9064   | A0401, A1001, A1002, A1101, A0301, A0601, A0701   |
| 244 | 96-024   | E.E.X.I.   | 56-58 CH. TRIKOYPI ST.                                       | ATHENS         | 106 80 | +30210 363 3650/ +30210 363 3107   | A0701, A0401  |
| 245 | 01-020   | ZEPHYR HELLAS S.A.                                   | 321 MESSOGION AVE.   | CHALANDRI      | 152 31 | +30210 650 4100/ +30210 651 6712   | A1103, A0101, A0201, A0202, A0301, A0302, A0401, A0402, A0403, A0404, A0501, A0503, A0601, A0602, A0603, A0604, A0605, A0701, A0901, A1001, A1002, A1101, A1201   |
| 246 | 01-025   | 3 NET S.A.   | 23-25 LEKKA ST.  | ATHENS         | 105 62 | +30210 322 9885/ +30210 322 2452   | A0101, A0601, A0602, A0603, A0604, A0605, B0101, B0103, B0301, B0401  |
| 247 | 98-040   | 4GM TECHNOLOGIES NEON MESON (NEW MEDIA TECHNOLOGIES) | 8 G. PALAMA ST.  | THESSALONICA   | 546 22 | +30231 026 0252/ +30231 026 0252   | A0401, A0701  |



## Appendix IV

### Codification of Telecommunications Services

| A. CLASSES OF FIXED TELECOMMUNICATIONS SERVICES |  |       |  |
|---|--|-------|--|
| A01.  | Provision of Fixed Network Transmission (excluding Satellite Transmission Lines) | A0101 | Provision of fixed network transmission lines (leased Lines) to the public, via (entirely or in part) a network infrastructure owned and/or managed by the declarant |
| A02.  | Capacity Leasing   | A0201 | Leasing of capacity to the public, via (entirely or in part) a network infrastructure owned and/or managed by the declarant  |
|   |  | A0202 | Provision of Private Virtual Network (PVN) to the public, via (entirely or in part) a network infrastructure owned and/or managed by the declarant                   |
| A03.  | Data Transmission Services   | A0301 | Packet-switched data transmission  |
|   |  | A0302 | Circuit-switched data transmission   |
|   |  | A0303 | Telex service without allocation of numbers under the NNP  |
| A04.  | Value-Added Data Services  | A0401 | Electronic mail (e-mail)   |
|   |  | A0402 | Electronic Data Interchange (EDI)  |
|   |  | A0403 | Value-added facsimile service  |
|   |  | A0404 | Accounting services/ Electronic Funds Transfer (EFT)   |
|   |  | A0405 | Remote control services  |
|   |  | A0406 | Teletex  |
|   |  | A0407 | Videography services   |
|   |  | A0408 | Telewriting services   |
|   |  | A0409 | Teleprocessing services  |
|   |  | A0410 | Telegraphy services  |
|   |  | A0411 | Telemetry services   |
| A05.  | Integrated Value-Added Services  | A0501 | Videoconference  |
|   |  | A0502 | Business TV  |
|   |  | A0503 | Viewphone  |
| A06.  | Network Management Services  | A0601 | Network operation for Closed User Groups, including the provision of general telecommunications services (including voice switching)                                 |
|   |  | A0602 | Network operation for Closed User Groups, including the provision of general telecommunications services (excluding voice switching)                                 |
|   |  | A0603 | Provision of gateways between networks belonging to different parties  |
|   |  | A0604 | Network access services, e.g. for access to networks of mailbox providers, on-line information service and/or Internet Service Providers                             |
|   |  | A0605 | Network support services   |
|   |  | A0606 | Intelligent Network (IN) services  |
|   |  | A0607 | Automatic Call-back services   |
| A07.  | Internet Services  | A0701 | Provision of Internet services   |
| A08.  | Technical Provision of Broadcasting Services                                     | A0801 | Transmission of audio and/or TV signals between installations of Broadcasting Companies  |
|   |  | A0802 | Relaying of Broadcasting signals   |
|   |  | A0803 | Distribution of Broadcasting signals - via terrestrial relay stations<br>- via cable networks  |

**A. CLASSES OF FIXED TELECOMMUNICATIONS SERVICES**

|      |  |       |  |
|------|--|-------|--|
| A09. | Technical Provision of Multimedia Services | A0901 | Provision of multimedia services   |
| A10. | Voice Services                             | A1001 | Voice Telephony services for the public, via (entirely or in part) a network infrastructure owned and/or managed by the declarant, without allocation of numbers under the NNP |
|      |  | A1002 | Voice services provided via the Internet   |
| A11. | Value-Added Voice Services                 | A1101 | Voice mailbox  |
|      |  | A1102 | Audiotex   |
|      |  | A1103 | Audioconference services   |
| A12. | Public Telecommunications Stations         | A1201 | Provision of public phones   |
|      |  | A1202 | Other telecommunications stations  |
| A13. | Other Telecommunications Services          |       |  |

**B. CLASSES OF MOBILE RADIO COMMUNICATIONS SERVICES**

|      |  |       |  |
|------|--|-------|--|
| B01. | Mobile Voice Services                                | B0101 | Voice transmission for the public, without allocation of numbers under the NNP |
|      |  | B0102 | Facsimile and data transmission  |
|      |  | B0103 | SMS (Short Messaging Service)  |
|      |  | B0104 | Mailbox Services   |
| B02. | Radio Call Services                                  | B0201 | Unidirectional transmission of news (sound, drawings and/or text)              |
| B03. | Radio communications Services for Closed User Groups | B0301 | Voice and data transmission for Closed User Groups                             |
| B04. | Mobile Radio Data Services                           | B0401 | Packet-switched data transmission  |
| B05. | In-flight Telephony Services                         | B0501 | Voice, data and facsimile transmission   |
| B06. | Other Telecommunications Services                    |       |  |

**C. CLASSES OF SATELLITE SERVICES**

|      |   |       |   |
|------|---|-------|---|
| C01. | Provision of Satellite Transmission Lines | C0101 | Provision of Satellite Transmission Lines to the public, via (entirely or in part) a network infrastructure owned and/or managed by the declarant |
| C02. | General Satellite Services                | C0201 | Broadcasting Distribution services  |
|      |   | C0202 | Business TV   |
|      |   | C0203 | Satellite News Gathering  |
|      |   | C0204 | Data Transmission services  |
|      |   | C0205 | Videoconference   |
| C03. | Mobile Satellite Services                 | C0301 | Fleet Management/ Position-Finding services   |
|      |   | C0302 | Telephony services  |
|      |   | C0303 | Data services   |
| C04. | Satellite Broadcasting Services           | C0401 | Transmission of audio and TV signals between Broadcasting Stations  |
|      |   | C0402 | Transmission of broadcast signals   |
|      |   | C0403 | Distribution of broadcast signals   |
| C05. | Other Telecommunications Services         |       |   |



| EXPLANATIONS |  |
|--------------|--|
| A0101        | The telecommunications means-facilities that offer capacity for transparent transmission between terminal points of the network, without offering optional switching capabilities (switching operations that may be controlled by the user as part of the leased line).        |
| A0201        | Leasing to the public of a part of the capacity of telecommunications lines, via (entirely or in part) a network infrastructure owned and/or managed by the declarant.   |
| A0202        | Provision of a Private Virtual Network via (entirely or in part) a network infrastructure owned and/or managed by the declarant. Private Virtual Network is the section of the corporate network that provides network services using common switching network infrastructure. |
| A0301        | Packet-switched transmission of digital information using specific standards, such as X.25, FPS (Fast Packet Switching) etc.   |
| A0302        | Circuit-switched transmission of digital information using specific standards, such as X.21.   |
| A0303        | Telegraphic service allowing direct temporary communication between subscribers, using a start-stop device and telecommunications circuits of the public telecommunications network.   |
| A0402        | Transmission of digital information using EDI standards.   |
| A0403        | Transmission of information stored in a database, using retrieval from the memory and automated mass-transmission.   |
| A0404        | Transmission of data for processing transactions between computers supporting running general accounting applications, as well as between computer systems supporting electronic payments (e.g. clearing systems etc.).  |
| A0405        | Transmission of data for remote control, tele-monitoring and remote diagnosis (excluding services for remote control of the operation of telecommunications networks/systems through private usage switchers).   |
| A0406        | Telematic service for transmission of text, offering additional facilities compared to the telex service and, more specifically, typing and remote text processing functions.  |
| A0407        | Telecommunications form in which information (generally in the form of digital data) is transmitted primarily in order to allow its selection and display to the user, in the form of text or image, using a visual display unit such as a TV monitor.                         |
| A0408        | Telecommunications service having as its purpose to transmit and simultaneously regenerate graphics in a remote terminal, in the form in which they had been written or designed in the sending terminal.  |
| A0409        | Service that combines telecommunications techniques with data processing techniques, with the aim to remotely process information.   |
| A0410        | Telecommunications service in which the information transmitted is intended to be recorded, upon reception, as a graphics string.<br>The information transmitted may sometimes be displayed in an alternative format or may be stored for future use.                          |
| A0411        | Procedure in the context of which measurements take place at remote locations and the results are transmitted via telecommunications networks.   |
| A0501        | Teleconferencing service, where the participants are connected via circuits allowing the transmission of fully moving image, voice, text and data.   |



## EXPLANATIONS

|       |   |
|-------|---|
| A0502 | Broadband transmission of audio and TV signals to Closed User Groups (e.g. for educational purposes).   |
| A0503 | Service combining telephony techniques with TV techniques, allowing users to see each other during their telephone communication.   |
| A0601 | Operation and management of telecommunications networks for Closed User Groups, including voice switching capabilities.   |
| A0602 | Operation and management of telecommunications networks for Closed User Groups, without voice switching capabilities.   |
| A0603 | Provision of gateways, in order to achieve interconnection between networks belonging to different parties.   |
| A0604 | Provision of gateways in networks, e.g. networks of voice mailbox providers, on-line information service providers and Internet providers (including the services provided in these networks, such as e-mail, fax etc.).                      |
| A0605 | Transmission of data for remote control, tele-monitoring, remote diagnosis and support of telecommunications networks or systems.   |
| A0606 | Network services, provision of which requires Intelligent Network features and functionalities (e.g. the called party assumes payment of telephone charges, etc.).  |
| A0607 | Provision of (international) connections using the automatic call-back method.  |
| A0701 | Services that are provided via the Internet and do not belong to any of the other classes described above.  |
| A0801 | Transmission of audio and/or TV signal between Broadcasting Companies, via external transmission and distribution lines, as well as via programme exchange lines.   |
| A0802 | Transmission of audio and TV signals from the radio or TV station to the broadcasting distribution networks.  |
| A0803 | Distribution of broadcasting signals to subscribers, via broadcasting distribution networks using cable networks and/or terrestrial relay stations.   |
| A0901 | Transmission and management of multimedia services via telecommunications networks. Multimedia services include teleshopping, tele-education, video-on-demand, pay-per-view or similar services.  |
| A1001 | Real-time voice transmission and/or switching, via (entirely or in part) a network infrastructure owned and/or managed by the declarant, without allocation of numbers under the NNP (including the provision of general facsimile services). |
| A1002 | Voice services provided via the Internet and without allocation of numbers under the NNP.   |
| A1101 | Provision of voice memory, where voice mail may be deposited and retrieved.   |
| A1102 | Provision of technical infrastructure for retrieval of information and entertainment programmes via a specific call number.   |
| A1103 | Teleconferencing service, where the participants are connected via circuits supporting the transmission of voice. In addition to voice, other signals (such as facsimile or telewriting) can also be transmitted.                             |
| A1201 | Provision of public phones (including provision of general facsimile services).   |
| A1202 | Provision of other telecommunications stations.   |



| EXPLANATIONS |  |
|--------------|--|
| B0101        | Real-time voice transmission and/or switching, via (entirely or in part) a mobile telephony network infrastructure owned and/or managed by the declarant, without allocation of numbers under the NNP. Call forwarding is through cellular analogue or digital terrestrial radio networks and points providing interconnection with public fixed networks. |
| B0102        | Facsimile services (printed or computer-generated fax) and data transmission services.   |
| B0103        | Transmission of short messages (up to 160 alphanumeric characters).  |
| B0104        | Provision of voice memory.   |
| B0201        | Analogue and digital transmission of signal, which introduces sound series or alphanumeric characters to mobile receivers.   |
| B0301        | Analogue or digital transmission of voice and data to a restricted user group. Transition to a fixed network is one option.  |
| B0401        | Transmission of digital information by packet switching via virtual connections, using specific standards (e.g. X.25) on a mobile data radio network. Transition to a fixed network is possible.   |
| B0501        | Voice, data and facsimile communications with fixed and mobile networks, for passengers of airborne vehicles, via terrestrial radio stations.  |
| C0101        | The telecommunications means-facilities that offer capacity for transparent transmission between terminal points of the satellite network, without offering optional switching capabilities (switching operations that may be controlled by the user as part of the leased line).  |
| C0201        | Unidirectional data transmission in the form of point-to-multipoint connections.   |
| C0202        | Broadband transmission of audio and TV signals to one or more receiving stations of a selected group of users.   |
| C0203        | Transmission of video from the location where it takes place to a TV studio, via mobile satellite transmission systems.  |
| C0204        | Provision of unidirectional or interactive data transmission paths to the installations of subscribers, via satellite systems.   |
| C0205        | Teleconferencing service, where the participants are connected, via suitable satellite links, for the transmission of fully moving image, voice, text and data.  |
| C0301        | Transmission of alphanumeric data and information between a central station and moving units (vehicles) and radiolocation.   |
| C0302        | Real-time voice transmission and/or switching, via analogue and/or digital satellite networks.   |
| C0303        | Data transmission and/or switching via analogue and/or digital satellite networks.   |
| C0401        | Transmission of audio and TV signals between broadcasting station, via satellite links.  |
| C0402        | Transmission of broadcast signals from the broadcasting station to the corresponding broadcasting distribution satellites.   |
| C0403        | Distribution of broadcast signals for direct satellite reception by broadcasting subscribers.  |

## Appendix V

### List of Undertakings Licensed to provide Postal Services (as in force on 31 December 2003)

| No | BUSINESS NAME   | DISTINCTIVE TITLE                              | ADDRESS                         | PC     | CITY             | TEL./FAX   | REG.NO. |
|----|---|--|---------------------------------|--------|------------------|--|---------|
| 1  | A. PAPAZOGLOU & CO  | A. PAPAZOGLOU & CO                             | 88 OCTOBER 23 <sup>rd</sup> ST. | 412 23 | LARISSA          | +30241 023 9828/ +30241 023 7534                       | 01-207  |
| 2  | A.C.S INTERNATIONAL<br>TRANSPORTATIONS & FACILITIES CO                | A.C.S S.A.                                     | 25 ASKLIPIOU ST.                | 145 68 | KRIONERI ATTIKIS | +30210 819 0000, +30210 819 0100/<br>+30210 819 0261   | 99-122  |
| 3  | ABARTSIDIS A. - PARASKEVAS X. CO                                      | SWIFT MAIL EXPRESS COURIER                     | 74 FILIPPOU ST.                 | 546 35 | THESSALONICA     | +30231 020 0251, +30231 020 0327/<br>+30231 020 2576   | 99-092  |
| 4  | ACE INTERNATIONAL TRANSPORTATION<br>SERVICES - COURIERS S.A.          | ACE INTERNATIONAL<br>CARGO-COURIER SERVICES    | 16 PIKRODAFNIS ST.              | 175 62 | P. FALIRO        | +30210 985 5245/ +30210 985 9382                       | 03-064  |
| 5  | ADAMOPOULOU ATHANASIA   | CITY COURIER                                   | 211-213 IONIAS AVE.             | 111 45 | ATHENS           | +30210 211 3065, +30210 211 3061                       | 00-161  |
| 6  | ADCO - A. & P. ANTONOPOULOS LTD.                                      | ADCO   | 54 G. PAPANDREOU ST.            | 135 62 | AG. ANARGIRI     | +30210 269 0000-8/ +30210 269 0150                     | 00-164  |
| 7  | ALAMANOU G. MARIA   | RABBIT COURIER                                 | 3 ARGOSTOLIOU ST.               | 113 62 | ATHENS           | +30210 884 0647/ +30210 882 6255                       | 99-074  |
| 8  | ALATERA VASILIKI  | ALATERA VASILIKI                               | 4 KILKIS ST.                    | 814 00 | LIMNOS           | +30225 402 4081/ +30225 402 4143                       | 01-213  |
| 9  | ALMAN HELLAS PERIFERALS LTD.  | ALMAN HELLAS LTD.                              | 23 ORTANSIAS ST.                | 136 77 | ACHARNES         | +30210 240 9150/ +30210 240 9155                       | 02-001  |
| 10 | ANASTASSAKI NIKI  | ANASTASSAKI NIKI                               | 2 DAGRE ST.                     | 212 00 | ARGOS            | +30275 102 3855/ +30275 106 3252                       | 02-024  |
| 11 | ANTONIOU KONSTANTINOS   | RAINBOW EXPRESS COURIERS                       | 40 MIRONOS ST.                  | 173 43 | AGIOS DIMITRIOS  | +30210 976 5687/ +30210 971 8342                       | 99-142  |
| 12 | APOSTOLATOU CHRISTINA   | COURIER SERVICE WORLDWIDE                      | 5 A. METAXA ST.                 | 281 00 | ARGOSTOLI        | +30267 102 3426/ +30267 102 3426                       | 99-060  |
| 13 | APOSTOLIDIS IOANNIS   | APOSTOLIDIS IOANNIS                            | KILA                            | 501 00 | KOZANI           | +30246 103 9806/ +30246 103 9406                       | 02-007  |
| 14 | ARAMEX (HELLAS)<br>INTERNATIONAL TRANSPORTATION S.A.                  | ARAMEX (HELLAS)<br>INTERNATIONAL S.A.          | 34 VOULIAGMENIS AVE.            | 164 52 | ARGIROUPOLI      | +30210 995 8950-5/ +30210 995 8849,<br>+30210 381 0249 | 99-130  |
| 15 | ASSOI COURIERS TRANSPORTATIONS<br>LOGISTICS OPERATIONAL SERVICES S.A. | OI ASSOI POY PANE PANTOU<br>INTERNATIONAL S.A. | 5-7 KLISSOURAS ST.              | 161 21 | ATHENS           | +30210 725 7770/ +30210 724 9370                       | 99-135  |
| 16 | ATHANASIOS SIROKOS  | ATHANASIOS SIROKOS                             | 38 GRIVA ST.                    | 301 00 | AGRINIO          | +30264 102 9789/ +30264 102 9789                       | 02-075  |
| 17 | AVGOUSTAKI IRINI  | AVGOUSTAKI IRINI COURIER                       | 117 ETHN. ANTISTASSEOS ST.      | 713 07 | HERAKLIO CRETE   | +30281 028 4828, +30281 028 4010/<br>+30281 028 4010   | 01-227  |
| 18 | BABATSIKOS THEODOROS  | BABATSIKOS THEODOROS                           | 3 BIZANIOU ST.                  | 271 00 | PIRGOS           | +30262 102 9679/ +30262 108 1343                       | 03-029  |
| 19 | BANTAS A. - MAKRIDIS E. CO  | INTEREVROS COURIERS                            | 54 KON. PALAIOLOGOU ST.         | 681 00 | ALEXANDROUPOLI   | +30255 108 9180/ +30255 108 9181                       | 03-008  |
| 20 | BELITSOS ANASTASIOS   | EVIA EXPRESS COURIER                           | 18 CHARALABOUS ST.              | 341 00 | CHALKIDA         | +30222 107 6458, +30222 102 6008/<br>+30222 106 0563   | 00-174  |



| No | BUSINESS NAME                               | DISTINCTIVE TITLE                  | ADDRESS                            | PC     | CITY           | TEL./FAX  | REG.NO. |
|----|---|------------------------------------|------------------------------------|--------|----------------|---|---------|
| 21 | BENEKIS NIKOLAOS                            | IKAROS NET                         | 134 SKIATHOU ST.                   | 112 55 | ATHENS         | +30210 346 2568/ +30210 346 2568  | 02-053  |
| 22 | BIKAKIS K. - GEORGIU Z. CO                  | HELLAS EXPRESS COURIER             | 21 - 23 SACHTOURI ST.              | 185 36 | PIRAEUS        | +30210 418 3975/ +30210 418 3975  | 02-036  |
| 23 | BOUZOS P. - DROUBOGIANNIS E. CO             | BOUZOS P.<br>- DROUBOGIANNIS E. CO | 12 PAFOU ST.                       | 851 00 | RHODES         | +30224 103 7838   | 03-063  |
| 24 | BRATSIAKOU CHARALABIA                       | BRATSIAKOU CHARALABIA              | 18 VAS. OLGAS ST.                  | 241 00 | KALAMATA       | +30272 109 6903/ +30272 102 8606  | 01-279  |
| 25 | CAPOCCI AIR SYSTEM LTD.                     | CAPOCCI AIR SYSTEM LTD.            | MEGARIDOS ST. SINTRIVANI LOCALITY, | 193 00 | ASPROPIRGOS    | +30210 550 0551/ +30210 550 0531  | 02-077  |
| 26 | CITY MESSENGERS COURIERS S.A.               | CITY MESSENGERS S.A.               | 4 SEFERI ST.                       | 144 52 | METAMORFOSSI   | +30210 285 6391/ +30210 283 6888  | 01-232  |
| 27 | CH. VARDAKAS -A. KAVADIAS CO                | GALAXY WORLDWIDE                   | 3 ALKIONIAS ST.                    | 116 31 | ATHENS         | +30210 752 0014, +30210 752 0016  | 99-109  |
| 28 | CHALKIADAKIS IOANNIS                        | CHALKIADAKIS IOANNIS               | 13 ARKOLEONTOS ST.                 | 712 02 | HERAKLIO CRETE | +30281 034 1870/ +30281 034 4690  | 00-175  |
| 29 | CHARIZANIS PETROS                           | ORFEAS COURIER                     | 73 ITHAKIS ST.                     | 115 51 | ATHENS         | +30210 821 7051   | 03-004  |
| 30 | CHARIKLIA KANTZA                            | KANTZAS COURIER                    | 28A VIRONOS ST.                    | 351 00 | LAMIA          | +30223 103 9564, +30233 104 2474/<br>+30223 102 9285                    | 02-005  |
| 31 | CHASSIOTIS EL. & CO                         | CHASSIOTIS EL. & CO                | 33 P. P. GERMANOU ST.              | 546 22 | THESSALONICA   | +30231 024 2385/ +30231 024 2544  | 99-128  |
| 32 | CHATZIGEORGIU NIKOLAOS                      | CHATZIGEORGIU NIKOLAOS             | 87 CANADA ST.                      | 851 00 | RHODES         | +30224 103 0917/ +30224 107 4229  | 01-217  |
| 33 | CHINOS DIMITRIOS                            | COURIER TOP SPEED                  | 30 KONSTANTINOPOLEOS ST.           | 136 71 | ACHARNES       | +30210 268 5714/ +30210 231 6145  | 99-024  |
| 34 | CHRISTODOULATOS DIONISIOS                   | CHRISTODOULATOS DIONISIOS          | 58 YERGOTI AVE.                    | 281 00 | ARGOSTOLI      | +30267 102 9192   | 03-066  |
| 35 | CHRONAKOS ANASTASIOS                        | FLIGHT EXPRESS                     | 228 SOKRATOUS ST.                  | 176 74 | KALLITHEA      | +30210 941 1624, +30210 941 1672,<br>+30210 941 1674 / +30210 941 1616, | 99-008  |
| 36 | CHRONOPOULOU ASSIMINA & CO                  | ORDER TAKER                        | 25 MARMARA ST.                     | 114 76 | ATHENS         | +30210 645 2500-6/ +30210 645 7170                                      | 99-137  |
| 37 | CHRISSAFOPOULOS DIMITRIOS                   | CHRISSAFOPOULOS DIMITRIOS          | 57 LEONIDOU ST.                    | 351 00 | LAMIA          | +30223 104 6416/ +30223 104 6416  | 01-199  |
| 38 | CHRISOS VOITHOS TACHIMETAFORES LTD.         | CHRISOS VOITHOS LTD.               | 45 26 <sup>o</sup> OCTOBER         | 546 27 | THESSALONICA   | +30231 050 2502/ +30231 050 2501  | 02-076  |
| 39 | CHRISOULI EKATERINI                         | GOLD ARROW SERVICES                | 43 MITROPOLEOS ST.                 | 151 24 | MAROUSSI       | +30210 614 7111/+30210 614 7101   | 03-052  |
| 40 | CHRISOULI ALEXANDRA                         | CHRISOULI ALEXANDRA                | 7 KOUNTOURIOTOU ST.                | 652 01 | KAVALA         | +30251 023 2051, +30251 062 0671/<br>+30251 023 2051                    | 01-281  |
| 41 | COURIER ERMIS LTD.                          | COURIER ERMIS LTD.                 | 51 SP. TRIKOUPH ST.                | 106 83 | ATHENS         | +30210 822 0800/ +30210 825 0982  | 99-132  |
| 42 | D. KAPELAKIS - V. BARDAKIS CO               | PEGASUS COURIER                    | 8 ENIANOS ST.                      | 104 34 | ATHENS         | +30210 825 3409, +30210 825 3410/<br>+30210 825 3625                    | 01-222  |
| 43 | D.K.S. COURIERS LTD.                        | D.K.S.                             | 32A AG. ANARGIRON ST.              | 151 24 | MAROUSSI       | +30210 610 9660-2-6/ +30210 610 9660                                    | 99-111  |
| 44 | DEDELOUDI ANGELIKI                          | DEDELOUDI ANGELIKI                 | 33 ORFEOS ST.                      | 683 00 | DIDIMOTICHO    | +30255 302 3143/ +30255 302 3143  | 01-197  |
| 45 | DELTA TACHIDROMIKI LTD.                     | DELTA POST TACHIDROMIKI            | 41 SOUTSOU ST.                     | 115 21 | ATHENS         |   |         |
| 46 | DERPANIS I. - LOTSIOS ST. CO                | DERPANIS I. - LOTSIOS ST.          | 114 IOANNINON ST.                  | 412 22 | LARISSA        | +30241 061 8077/ +30241 028 3925  | 99-095  |
| 47 | DHL INTERNATIONAL (HELLAS)<br>COURIERS S.A. | DHL INTERNATIONAL<br>(HELLAS) S.A. | 44 ALIMOU AVE. & 17 ROMA ST.       | 174 55 | ALIMOS         | +30210 989 0851, +30210 989 0000/<br>+30210 988 6450                    | 99-097  |



| No | BUSINESS NAME   | DISTINCTIVE TITLE                       | ADDRESS   | PC     | CITY            | TEL./FAX   | REG.NO. |
|----|---|---|---|--------|-----------------|--|---------|
| 48 | DIADIKTIAKI METAFORIKI S.A.<br>PROIONTON IPSILIS TECHNOLOGIAS | WWW WORLD WIDE<br>WHEELS S.A.           | 56 - 58 PAPANIKOLI ST.<br>& ETHNIKIS ADISTASEOS | 152 37 | CHALANDRI       | +30210 689 7004, +30210 689 7000                     | 03-059  |
| 49 | DIAKINISI LTD.  | QMS QUALITY MAIL SERVICE                | 42A V. IPIROU ST.                               | 104 44 | ATHENS          | +30210 514 9752, +30210 513 8026/<br>+30210 513 0539 | 99-101  |
| 50 | DIAKOUMIS DIMITRIOS   | DIAKOUMIS DIMITRIOS                     | 22 PAROU ST.                                    | 131 22 | ILION           | +30210 263 3833/ +30210 263 3273                     | 99-065  |
| 51 | DIAKOUMIS SOTIRIOS  | DIAKOUMIS SOTIRIOS                      | 21 MIKONOU ST.                                  | 131 22 | ILION           | +30210 263 2595                                      | 99-066  |
| 52 | DIETHNIS TACHIDROMIKI ENOSI S.A.                              | INTERMAIL S.A.                          | 73-75 MACHIS ANALATOU ST.                       | 117 45 | ATHENS          | +30210 901 9000/ +30210 902 9755                     | 99-115  |
| 53 | DIETHNIS AEROMETAFORES M. LTD.                                | I.A.B.M. LTD.                           | 8 ILISSION ST.                                  | 157 71 | ZOGRAFOU        | +30210 778 3200/ +30210 779 0496                     | 99-123  |
| 54 | DIGALAKIS MICHAEL   | PELARGOS COURIER                        | 44 PIRRAS ST.                                   | 117 45 | N. KOSMOS       | +30210 921 2227, +30210 921 4141/<br>+30210 921 2229 | 99-073  |
| 55 | DIMITRIOS CHATZINOULAS & CO                                   | CITY POST                               | 103 - 105 KIPROU ST.                            | 412 22 | LARISSA         | +30241 053 4544/ +30241 053 4542                     | 99-094  |
| 56 | DIMOPOULOS A. - TSELEPIDIS E. CO                              | QUICK & SAFE COURIER                    | THIRAS ST. & 22 VIRONOS ST.                     | 164 51 | ARGIROUPOLI     | +30210 993 1058                                      | 01-211  |
| 57 | DORDIOU DESPINA   | NEA ATHINAIKI                           | 10 ACHELOOU ST.                                 | 546 27 | THESSALONICA    | +30231 055 4508/ +30231 051 4121                     | 02-060  |
| 58 | DRAKOMATHIOULAKIS N. & CO                                     | DRAKOMATHIOULAKIS N. & CO               | 168 ETHN. ANTISTASEOS ST.                       | 713 06 | HERAKLIO- CRETE | +30281 033 3450/ +30281 033 0009                     | 02-071  |
| 59 | DRAKOPOULOS ANTONIOS  | DRAKOPOULOS ANTONIOS                    | 20 AG. LOUKA SQ.                                | 291 00 | ZAKINTHOS       | +30269 504 3636/ +30296 504 3636                     | 99-069  |
| 60 | DROMEAS COURIER LTD.  | DROMEAS COURIER LTD.                    | 6 IDIPODOS ST.                                  | 104 42 | ATHENS          | +30210 515 4130/ +30210 515 4132                     | 99-029  |
| 61 | DROSSOU VASILIKI  | DROSSOU VASILIKI                        | 49 EL. POLIORKIMENON ST.                        | 302 00 | MESOLLOGGI      | +30263 102 6545/ +30263 102 5800                     | 03-002  |
| 62 | E. BEIKO & CO   | SFERA EXPRESS -COURIER                  | 123 SARANTAPOROU ST.                            | 152 32 | CHALANDRI       | +30210 683 3304/ +30210 683 3305                     | 01-204  |
| 63 | E. CHETZAKIS & CO   | CHETZAKIS COURIER                       | 15 DIMOKRATIAS AVE.                             | 713 06 | HERAKLIO CRETE  | +30281 022 9869,-2/ +30281 022 9881                  | 01-212  |
| 64 | EFSTATHIOU EVANGELIA  | EFSTATHIOU EVANGELIA                    | 45 PATRON ST.                                   | 201 00 | KORINTHOS       | +30274 102 8663                                      | 01-271  |
| 65 | ELTA COURIER S.A.   | ELTA COURIER S.A.                       | 40 D. GOUNARI ST.                               | 153 43 | AG. PARASKEVI   | +30210 607 3000/ +30210 607 3100                     | 01-200  |
| 66 | EURO COURIER S.A.   | EUROCOURIER S.A.                        | 95 THESSALONIKIS AVE.                           | 143 42 | N. FILADELFIA   | +30210 259 9000/ +30210 259 9290                     | 00-167  |
| 67 | EURONET - COURIER AND LOGISTICS S.A.                          | EURONET - COURIER<br>AND LOGISTICS S.A. | 8 ASTROUS ST.                                   | 131 21 | ILION           | +30210 578 5750/ +30210 578 5759                     | 00-168  |
| 68 | EXPRESS FLY LTD.  | EXPRESS FLY                             | 43 I. PASSALIDI ST.                             | 544 53 | THESSALONICA    | +30231 094 3535, +30231 092 4886/<br>+30231 094 3615 | 99-003  |
| 69 | FIRIGOS LTD.  | ARMAOS COURIERS                         | 12 OIKONOMOU ST.                                | 106 83 | ATHENS          | +30210 383 3417, +30210 381 0249                     | 02-052  |
| 70 | FESTERIDIS STEFANOS   | FESTERIDIS STEFANOS                     | 2 MITROPOLITOU PROKOPIOU ST.                    | 66 100 | DRAMA           | +30252 105 7257/ +30252 105 7258                     | 03-057  |
| 71 | FRATZOLIS DIMITRIOS   | AFTHIMERON TACHIMETAFORIKI              | 4 MIAOULI ST.                                   | 193 00 | ASPROPIRGOS     | +30210 557 8782/ +30210 557 8784                     | 01-260  |
| 72 | FOKOS D. - LEONARDOU A. S.A.                                  | FOKOS D. - LEONARDOU A. S.A.            | 2 GREBENON ST.                                  | 118 55 | VOTANIKOS       | +30210 346 1920/ +30210 345 4584                     | 99-086  |
| 73 | G. VOKOROKOS & CO   | SPEED COURIERS                          | 115-117 AKROPOLEOS ST.                          | 172 34 | DAFNI           | +30210 971 2720, +30210 970 2788/<br>+30210 976 0871 | 99-104  |
| 74 | GENIKH EXPRESS LTD.   | GENIKH EXPRESS LTD.                     | 81 AG. VASILIOU ST.                             | 173 43 | AG. DIMITRIOS   | +30210 973 2000/ +30210 973 0060                     | 02-050  |
| 75 | GENIKH TAXYDROMIKH S.A.                                       | GENIKH TAXYDROMIKH S.A.                 | 15 DASKALOGIANNI ST.                            | 144 52 | METAMORFOSSI    | +30210 284 2222/ +30210 283 5210                     | 99-149  |



## APPENDICES

| No  | BUSINESS NAME  | DISTINCTIVE TITLE                       | ADDRESS                       | PC     | CITY           | TEL./FAX   | REG.NO. |
|-----|--|---|-------------------------------|--------|----------------|--|---------|
| 76  | GENOS CH. - SAMARA E. CO   | GENOS CH. - SAMARA E. CO                | 2 D. ARGIROUDI ST.            | 661 00 | DRAMA          | +30252 102 6220                                      | 02-063  |
| 77  | GEORGIAKOPOULOS GRIGORIOS  | GEORGIAKOPOULOS GRIGORIOS               | 30 THEMISTOKLEOUS ST.         | 241 00 | KALAMATA       | +30272 109 5900/ +30272 109 5900                     | 99-030  |
| 78  | GEORGIPOULOS NIKOLAOS  | COURIEX INTERNATIONAL                   | 30 M. MERKOURI ST.            | 173 42 | AG. DIMITRIOS  | +30210 993 3933                                      | 03-016  |
| 79  | GERALEKIS GEORGIOS   | GERALEKIS GEORGIOS                      | 5 NIKOLARIZI ST.              | 831 00 | SAMOS          | +30227 302 5379/ +30227 302 4388                     | 03-049  |
| 80  | GIANNAKAKIS IOANNIS  | MY COURIER                              | 8 PANORMOU ST.                | 122 42 | AIGALEO        | +30210 531 1060/ +30210 531 1091                     | 03-005  |
| 81  | GIANNAKOPOULOS GEORGIOS  | GIANNAKOPOULOS GEORGIOS                 | 3 DAMOFONTOS ST. & PSARON ST. | 241 00 | KALAMATA       | +30272 106 3390/ +30272 106 2387                     | 01-298  |
| 82  | GIANNAKOPOULOU KALLIOPH-STELLA                                       | GIANNAKOPOULOU COURIER                  | 17 TSAKALOF ST.               | 601 00 | KATERINI       | +30235 103 7575/ +30235 107 7779                     | 02-035  |
| 83  | GIAOURAKIS NIKOLAOS  | GIAOURAKIS NIKOLAOS                     | 18 GIANNIKOU ST.              | 712 01 | HERAKLIO CRETE | +30281 028 6285, +30281 028 9354/<br>+30281 028 9354 | 99-036  |
| 84  | GIOTI VASSILIKI  | GIOTI VASSILIKI                         | 123 KARAIKAKI ST.             | 262 21 | PATRA          | +30261 024 3077/ +30261 024 3078                     | 03-053  |
| 85  | GOLAS NIKOLAOS   | I. D. S. COURIER                        | 5 ANTISTHENOUS ST.            | 117 43 | N. KOSMOS      | +30210 921 7060, +30210 921 7362/<br>+30210 921 7514 | 99-043  |
| 86  | GOLD MAIL COURIER S.A.   | GOLD MAIL S.A.                          | 26 THERMOPILON ST.            | 173 43 | AG. DIMITRIOS  | +30210 975 5555/ +30210 976 6623                     | 01-206  |
| 87  | GOLDEN COURIER HELLAS S.A.   | GOLDEN COURIER HELLAS S.A.              | 8 EGALIO ST.                  | 185 45 | PIRAEUS        | +30210 406 1130/ +30210 406 1139                     | 01-195  |
| 88  | GOTSPOULOS DIMITRIOS   | G.M.T. (GENERAL MAIL<br>TRANSPORTATION) | 60 AG. OROUS ST.              | 151 23 | MAROUSSI       | +30210 681 7508/ +30210 681 7508                     | 01-295  |
| 89  | GOUDIS NAOUM   | GOUDIS NAOUM                            | 3 AG. MINA ST.                | 521 00 | KASTORIA       | +30246 702 7138, +30246 702 3525/<br>+30246 702 7138 | 02-033  |
| 90  | GOURAS PANTELIS  | BUSINESS COURIER                        | 107-109 ATTHIDON ST.          | 176 76 | KALLITHEA      | +30210 953 0439/ +30210 953 0723                     | 03-056  |
| 91  | GRIGORIADIS GEORGIOS   | GRIGO COURIER                           | 10 KALAPOTHAKI ST.            | 546 24 | THESSALONICA   | +30231 022 9689, +30231 028 0919/<br>+30231 022 8679 | 00-166  |
| 92  | HELLENIC TAXYDIADROMES COURIERS S.A.                                 | HELLENIC COURIERS                       | 8 -12 AG. THOMA ST.           | 115 27 | ATHENS         | +30210 777 7291/ +30210 777 7528                     | 03-070  |
| 93  | I. GIANNAKIDIS - TH. VOSVOLIDIS CO                                   | I. GIANNAKIDIS -<br>TH. VOSVOLIDIS CO   | 35 N. ZOIDI ST.               | 691 00 | KOMOTINI       | +30253 108 3100, +30253 108 3101                     | 03-033  |
| 94  | IAKOVIDIS IOANNIS-ALEXANDROS   | IAKOVIDIS IOANNIS-ALEXANDROS            | 6 DAGKLI ST.                  | 654 03 | KAVALA         | +30251 062 0640/ +30251 023 3200                     | 02-041  |
| 95  | ICS COURIERS LTD.  | ICS                                     | EPIDAVROU ST. & KORITSAS ST.  | 122 43 | AIGALEO        | +30210 531 5832/ +30210 531 5833                     | 03-062  |
| 96  | IDP EXPRESS S.A. INTERNATIONAL<br>DOCUMENTS & PARCELS TRANSPORTATION | IDP EXPRESS                             | 51 A. SIMEONIDI ST.           | 546 38 | THESSALONICA   | +30231 024 9241-2/ +30231 033 1290                   | 99-145  |
| 97  | ILIAS GEORGIU  | PI & FI                                 | STAMOULI ST. & KRIZOTOU ST.   | 341 00 | CHALKIDA       | +30222 102 7603                                      | 03-023  |
| 98  | INTER DELIVERY SERVICE LTD.  | I.D.S.                                  | 13 CHALKIDOS ST.              | 546 27 | THESSALONICA   | +30231 052 5340/ +30231 052 5340                     | 01-193  |
| 99  | INTERATTICA COURIER NETWORK S.A.                                     | INTERATTICA S.A.                        | 415 PANAGI TSALDARI ST.       | 176 75 | KALLITHEA      | +30210 940 7700/ +30210 940 7680                     | 99-136  |
| 100 | INTERNATIONAL TRAFFIC COURIER LTD.                                   | INTERNATIONAL<br>TRAFFIC COURIER LTD.   | 22 AGIOU DIONISSIOU ST.       | 185 40 | PIRAEUS        | +30210 422 6624, +30210 422 6071/<br>+30210 413 3395 | 99-152  |



| No  | BUSINESS NAME  | DISTINCTIVE TITLE                  | ADDRESS                  | PC     | CITY               | TEL./FAX   | REG.NO. |
|-----|--|------------------------------------|--------------------------|--------|--------------------|--|---------|
| 101 | INTERPOST INTERNATIONAL<br>TRANSPORTATION OF DOCUMENTS<br>& PARCELS S.A. | INTERPOST S.A.                     | 4 TH. IKONOMOU ST.       | 115 25 | ATHENS             | +30210 674 3300/ +30210 674 3344                     | 99-108  |
| 102 | INTERPOST SERVICE LTD.   | INTERPOST SERVICE LTD.             | 7 MAKEDONIKIS AMINIS ST. | 546 31 | THESSALONICA       | +30231 028 7721/ +30231 028 7764                     | 02-028  |
| 103 | IOANNOU LEONIDAS & CO  | COURIERS AT TOP SPEED              | 29 THOUKIDIDOU ST.       | 135 62 | AG. ANARGIRI       | +30210 238 8618, +30210 232 1333/<br>+30210 238 7778 | 00-179  |
| 104 | K. DORLI & CO  | HERMES                             | 19 GOUMERAS ST.          | 502 00 | PTOLEMAIDA         | +30246 302 3801                                      | 03-036  |
| 105 | K. KALIAKATSOS -D. VOLTIS CO   | DUCK MAIL<br>YOUR PERSONAL COURIER | 58 PAPADA ST.            | 115 25 | ATHENS             | +30210 692 3111-18-19/ +30210 698 2579               | 02-009  |
| 106 | K. MAKRIS & ASSOCIATES CO  | DAY I                              | 1 N. MALTEZOU ST.        | 174 55 | ALIMOS             | +30210 988 8300                                      | 03-040  |
| 107 | K. MITRIZAKIS & CO   | TRANSPORTS EXPRESS LINE            | 40 KIMIS ST.             | 551 33 | KALAMARIA          | +30231 041 2053/ +30231 041 9611                     | 00-176  |
| 108 | K. SARLIS - V. EFTHIMIOU CO  | ELEVEN COURIER                     | 8 KRATILOU ST.           | 104 42 | ATHENS             | +30210 515 4308/ +30210 512 9668                     | 01-214  |
| 109 | K. TILLIRIDIS-A. MOYRATAI CO   | G.S.C.                             | 101 ALKAMENOUS ST.       | 104 46 | ATHENS             | +30210 881 3080                                      | 02-032  |
| 110 | KABOURIS EMMANOUIL   | IKAROS COURIER                     | 53 ORFANIDOU ST.         | 111 42 | ATHENS             | +30210 213 3130, +30210 213 3230/<br>+30210 213 3250 | 99-046  |
| 111 | KADITIS KONSTANTINOS   | TRANS ELLAS                        | 31 SATOVRIANDOU ST.      | 104 31 | ATHENS             | +30210 524 4981                                      | 03-065  |
| 112 | KALAFATIS EVANGELOS  | KALAFATIS EVANGELOS                | 98 STAMATIOU PROIOU ST.  | 841 00 | ERMPOUPOLIS, SYROS | +30228 108 8898/ +30228 108 8895                     | 02-045  |
| 113 | KALERGIS KON/NOS   | KCS                                | 69 AG. KOSMA ST.         | 452 21 | IOANNINA           | +30265 104 4200/ +30265 104 4552                     | 02-059  |
| 114 | KANARIOU EVRIDIKI  | CHIOS EXPRES COURIER               | 46 KOUNTOURIOTOU ST.     | 821 00 | CHIOS              | +30227 102 1369/ +30227 104 4707                     | 99-018  |
| 115 | KANATSELIS DIMITRIOS   | GRANDE EXPRESS COURIER             | 145 KOLOKOTRONI ST.      | 185 36 | PIRAEUS            | +30210 453 3633/ +30210 418 6886                     | 99-139  |
| 116 | KANELATOS GEORGIOS CO  | SPRIDER COURIER                    | 77B KALLIROIS ST.        | 117 45 | N. KOSMOS          | +30210 923 5500/ +30210 923 5504                     | 03-044  |
| 117 | KANGA SERVICES COURIERS S.A.   | KANGA SERVICES COURIERS 3          | 4 THESSALONIKIS ST.      | 143 42 | N. FILADELFIA      | +30210 252 5175/ +30210 251 1115                     | 99-102  |
| 118 | KAPRALOU CHRISTINA   | MAY DAY COURIER SERVICES           | 123 ACH. PARASCHOU ST.   | 114 75 | ATHENS             | +30210 645 4174/ +30210 642 4496                     | 00-160  |
| 119 | KARADIMOS DIMITRIOS  | KARADIMOS DIMITRIOS                | 57 DIMOSTHENOUS ST.      | 413 36 | LARISSA            | +30241 028 6605/ +30241 023 3238                     | 01-201  |
| 120 | KARAGIANNIS STILIANOS  | KARAGIANNIS STILIANOS              | 2. TAR. ATHINAS ST.      | 851 00 | RHODES             | +30224 106 5639/ +30224 106 6500                     | 99-047  |
| 121 | KARAGIOZIDOU ATHINA & CO   | CITY RUNNERS                       | 32 PRIAMOU ST.           | 175 64 | P. FALIRO          | +30210 940 5385                                      | 03-007  |
| 122 | KARAKOSTA GEORGIA  | KARAKOSTA GEORGIA                  | 20 ETH. ANTISTASEOS ST.  | 331 00 | AMFISSA            | +30226 507 9269                                      | 03-050  |
| 123 | KARAMANOS PAVLOS   | EXPRESS CITY SERVICES              | 14 DELIGIANNI ST.        | 106 83 | ATHENS             | +30210 821 9959/ +30210 821 9217                     | 99-001  |
| 124 | KARANTZAS NIKOLAOS   | KARANTZAS NIKOLAOS                 | ARISTOFANOUS FILONOS ST. | 321 00 | LIVADIA            | +30226 102 3213/ +30226 108 2002                     | 03-048  |
| 125 | KARATSIOLIS EVANGELOS  | KARATSIOLIS EVANGELOS              | 2 ROMANOU ST.            | 621 00 | SERRES             | +30232 105 3436/ +30232 102 4416                     | 99-071  |
| 126 | KARAVAKOU ANGELIKI   | PIRAIKI COURIER                    | 76 ETOLIKOU ST.          | 185 45 | PIRAEUS            | +30210 462 9450/ +30210 462 9430                     | 99-057  |
| 127 | KAREKLAS SOTIRIOS  | KAREKLAS SOTIRIOS                  | 11 KENTRIKIS ST.         | 591 00 | VERIA              | +30233 107 3680, +30233 106 0490/<br>+30233 107 3680 | 01-208  |



| No  | BUSINESS NAME                            | DISTINCTIVE TITLE                              | ADDRESS                                      | PC     | CITY                  | TEL./FAX  | REG.NO. |
|-----|--|--|--|--------|-----------------------|---|---------|
| 128 | KIOULAFIS THEODOSIOS                     | KIOULAFIS THEODOSIOS                           | CHORA NAXOU                                  | 843 00 | NAXOS                 | +30228 502 3965/ +30228 502 3968                      | 02-020  |
| 129 | KIRIAKODIS I. - KONTOS E. CO             | INTER CHIOS COURIER                            | 7 SKANAVI ST.                                | 821 00 | CHIOS                 | +30227 108 1278/ +30227 108 1278                      | 01-221  |
| 130 | KIRKOS PASCHALIS                         | KIRKOS PASCHALIS                               | 2 KOMNINON ST.                               | 621 00 | SERRES                | +30232 105 1115, +30232 109 8378/<br>+30232 105 1115  | 00-180  |
| 131 | KLAPSA - GANTIRI OLGA                    | GANTIRI COURIER                                | SCHIMATARI                                   | 320 09 | SCHIMATARI            | +30226 205 9277/ +30226 205 9277                      | 01-225  |
| 132 | KLAVDIANOS KESAR                         | KLAVDIANOS KESAR                               | 5 KALVOU ST.                                 | 291 00 | ZAKINTHOS             | +30269 504 9222/ +30269 504 9222                      | 99-019  |
| 133 | KLEANTHIS P. MANIATIS                    | KLEANTHIS P. MANIATIS                          | CHRISSOMALLOUSSIS ST.<br>& 17A IAKINTHOU ST. | 811 00 | MITILINI              | +30225 104 3903, +30225 104 2186/<br>+30 225 104 3903 | 00-170  |
| 134 | KON. KRANITIS & CO                       | KRANITIS-COURIER                               | 203 PALEAS KAVALAS ST.                       | 121 36 | PERISTERI             | +30210 578 6679, +30210 578 6689/<br>+30210 578 6709  | 02-014  |
| 135 | KONSTANTINIDIS DIMITRIOS                 | PIGASSOS EXPRESS COURIER<br>SERVICES           | 14 DIOGENOUS ST.                             | 544 53 | K. TOUBA THESSALONICA | +30231 090 0422-3/ +30231 090 0423                    | 01-224  |
| 136 | KONSTANTINOPOULOU MARIA                  | KONSTANTINOPOULOU MARIA                        | 350 KORINTHOU ST.                            | 262 22 | PATRA                 | +30261 031 2151/ +30261 031 2151                      | 99-052  |
| 137 | KOSTAKOU ELENI                           | DAILY SERVICES                                 | KLIDI  | 590 32 | HMATHIA               | +30231 054 0104/ +30231 054 0104                      | 02-067  |
| 138 | KOSTAMIS CHRISTOS                        | KOSTAMIS CHRISTOS                              | 36 KAPODISTRIOU ST.                          | 431 00 | KARDITSA              | +30244 107 1941, +30244 102 6676/<br>+30244 107 1941  | 99-022  |
| 139 | KOUFOPOULOU PANAGIOTA                    | KOUFOPOULOU PANAGIOTA                          | 33 ER. STAVROU ST.                           | 221 00 | TRIPOLI               | +30271 022 1991/ +30271 022 1992                      | 02-008  |
| 140 | KOULOYAKOS DIM.<br>- DIMITRIOU CHRIS. CO | COCOONING<br>DAYNIGHT COURIERS                 | 14A MIRMIDONON ST.                           | 121 33 | PERISTERI             | +30210 577 4970-2/ +30210 577 7507                    | 99-004  |
| 141 | KOUNELIS NIKOLAOS                        | KOUNELIS NIKOLAOS                              | 6 ROIDOU ST.                                 | 821 00 | CHIOS                 | +30227 102 2550, +30227 102 3769/<br>+30227 104 3605  | 00-172  |
| 142 | KOUTSOULA GEORGIA                        | KOUTSOULA GEORGIA                              | 59 E. VENIZELOU ST.                          | 684 00 | SOUFLI                | +30255 402 2631                                       | 03-012  |
| 143 | LABROUSSIS GEORGIOS                      | LABROUSSIS GEORGIOS<br>GOLDAIR SUPER EXPRESS   | 10 KOUNGIOU ST.                              | 452 21 | IOANNINA              | +30265 107 9105, +30265 107 9115/<br>+30265 107 9115  | 99-034  |
| 144 | LADAS DIMITRIOS                          | LADAS DIMITRIOS<br>CHALKIDIKI COURIER SERVICES | 23 CHR. SMIRNIS ST.                          | 632 00 | MOUDANIA              | +30237 302 2865, +30237 302 4052/<br>+30237 302 4644  | 99-042  |
| 145 | LAMBROUSSIS BROS - K. SKARGIOTIS CO      | LAMBROUSSIS BROS -<br>K. SKARGIOTIS CO         | 155 DODONIS ST.                              | 452 21 | IOANNINA              | +30265 104 5035, +30265 104 9450/<br>+30265 106 6144  | 01-223  |
| 146 | LAVTZI CHRISTINA                         | LAVTZI CHRISTINA                               | 11 ANDRIANOPOLEOS ST.                        | 67100  | XANTHI                | +30254 106 8410/ +30254 106 8410                      | 02-069  |
| 147 | LAZARIDOU INTA                           | CONNECT COURIER SERVICES                       | 103 IVIS ST.                                 | 175 61 | P. FALIRO             | +30210 943 1984                                       | 03-055  |
| 148 | LEVAKIS KOSTAS                           | LEVAKIS KOSTAS                                 | 12 MICHAIL VOGDOU ST.                        | 671 00 | XANTHI                | +30254 106 4640/ +30254 106 4544                      | 01-196  |
| 149 | LIONS' FINANCIAL COLLECT COMPANY         | LIONS' COLLECT LTD.                            | 7-9 SPETSON ST.                              | 185 38 | PIRAEUS               | +30210 985 3333/ +30210 985 5322                      | 03-060  |



| No  | BUSINESS NAME   | DISTINCTIVE TITLE                     | ADDRESS                          | PC     | CITY           | TEL./FAX   | REG.NO. |
|-----|---|---------------------------------------|----------------------------------|--------|----------------|--|---------|
| 150 | LOUKOVITIS ASTERIOS   | LOUKOVITIS ASTERIOS                   | 12 KASSANDRAS ST.                | 632 00 | N. MOUDANIA    | +30237 306 5750/ +30237 306 5751                     | 03-024  |
| 151 | M. GIANNIOS - A. KATSAIDONIS<br>-S. LEFKADITIS CO                   | DROMOIS COURIER                       | 44 EVAG. NAPOLEONTA              | 491 00 | CORFU          | +30266 104 3186/ +30266 104 3680                     | 03-047  |
| 152 | M. KATSIMENIS - N. KEBERAS CO                                       | HELLENIC AIR COURIER                  | 22 FRAGON ST.                    | 546 25 | THESSALONICA   | +30231 055 6076/ +30231 055 6077                     | 01-243  |
| 153 | MAGIROPOULOS APOSTOLOS  | EURO MAIL                             | 8 DODEKANISSOU ST.               | 546 26 | THESSALONICA   | +30231 025 3098, +30231 054 0105                     | 99-084  |
| 154 | MAKKAS KONSTANTINOS   | MAKKAS KONSTANTINOS                   | 45 FRAGOPOULOU ST.               | 115 25 | ATHENS         | +30210 672 8365-7                                    | 99-012  |
| 155 | MAKRIOPOULIAS KON/NOS   | AGRINIO COURIER                       | 28 <sup>th</sup> OCTOBER SQ.     | 301 00 | AGRINIO        | +30264 105 7419/ +30264 105 5883                     | 02-049  |
| 156 | MALLIARAKI - MALIAROU ANNA  | JET LINES COURIER                     | 109 ALKIVIAIDOU ST.              | 104 46 | ATHENS         | +30210 881 5776-9/ +30210 884 2131                   | 99-059  |
| 157 | MARAGOS POLIVIOS  | MARAGOS POLIVIOS - POLIS              | 10 IVIS ST.                      | 121 35 | PERISTERI      | +30210 576 3101/ +30210 571 8775                     | 03-014  |
| 158 | MARGOULAS - TARASIDOU & CO  | EASY COURIER                          | 148 AGCHIALOU ST.                | 185 44 | PIRAEUS        | +30210 463 7511/ +30210 462 7034                     | 03-001  |
| 159 | MARKOS BIZAS COMMERCIAL TOURIST<br>ENTERPRISES - CAR RENTALS S.A.   | EUROCYCLADES S.A.                     | EKATONTAPYLIANIS SQ.             | 844 00 | PARIKIA PAROU  | +30228 402 1738/ +30228 402 2146                     | 02-037  |
| 160 | MARNELAKIS P. & CO  | ILIOS COURIER                         | 1 VLASTON ST.                    | 712 02 | HERAKLIO CRETE | +30281 028 2549/ +30281 028 2549                     | 99-089  |
| 161 | MARTSAKIS PANAGIOTIS  | MARTSAKIS PANAGIOTIS                  | 86 AN. GOGONI ST.                | 731 00 | CHANIA         | +30282 107 4551/ +30282 107 4551                     | 99-017  |
| 162 | MASS COURIER- TACHIMETAFORES S.A.                                   | MASS COURIER                          | 119 STR. PAPAGOU ST.             | 173 41 | AG. DIMITRIOS  | +30210 970 3409/ +30210 976 5375                     | 01-301  |
| 163 | MATARAGA THEODORA   | ON TIME COURIER                       | 9 P. KALLIGA ST.                 | 114 73 | ATHENS         | +30210 645 6831/ +30210 642 4498                     | 00-171  |
| 164 | MAVILI ELENI  | TACHYDROMEAS                          | 49 FILIKIS ETERIAS ST.           | 546 21 | THESSALONICA   | +30231 022 3042/ +30231 022 3042                     | 02-054  |
| 165 | MEDITERRANEAN COURIER LTD.  | C.C. COURIER CENTER                   | 265 IMITTOU ST.                  | 116 31 | ATHENS         | +30210 751 7300/ +30210 751 7022                     | 99-127  |
| 166 | MELENIKIOS ANTONIOS   | MELENIKIOS IOAN.<br>ANTONIOS EUROSEND | 5 THESSALONIKIS ST.              | 621 00 | SERRES         | +30232 105 1887                                      | 99-031  |
| 167 | MESSIMERTZIS KONSTANTINOS   | TRIKALA EXPRESS MAIL                  | 16 SOKRATOUS ST. & PLOUTONOS ST. | 421 00 | TRIKALA        | +30243 103 3425, +30243 107 6263/<br>+30243 103 3425 | 99-007  |
| 168 | METOCHIANAKIS ILIAS   | APOLLO COURIER                        | 4 TENEDOU ST.                    | 713 06 | HERAKLIO CRETE | +30281 022 1480                                      | 02-061  |
| 169 | METROPOLITAN COURIERS LTD.  | METROPOLITAN COURIERS                 | 1-3 AFRODITIS ST.                | 176 72 | KALLITHEA      | +30210 952 1747/ +30210 952 5050                     | 99-125  |
| 170 | MIDEX LTD.  | MIDEX LTD.                            | 97 FOTOMARA ST.                  | 117 45 | ATHENS         | +30210 921 2012/ +30210 921 1681                     | 00-187  |
| 171 | MIGDOS S. - LASPAS P. & CO  | TACHY - DROMEAS                       | 71 THEAGENOUS CHARISSI ST.       | 546 39 | THESSALONICA   | +30231 091 4088, +30231 094 4116/<br>+30231 093 0048 | 01-215  |
| 172 | MORAITIS ANDREAS  | MORAITIS ANDREAS COURIER<br>SERVICES  | 84 CHAR. TRIKOUPI ST.            | 301 00 | AGRINIO        | +30264 105 8887/ +30264 105 8887                     | 02-043  |
| 173 | MOREAS KANELLOPOULOS - KANISTRAS<br>TRANSPORTATIONS & AGENCIES LTD. | MOREAS                                | 52 OTHONOS - AMALIAS ST.         | 262 21 | PATRA          | +30261 027 4560, +30261 027 3523/<br>+30261 022 5211 | 99-107  |
| 174 | MOSCHOPOULOS IOANNIS  | FIS COURIER SERVICES                  | 9 KOSTI PALAMA ST.               | 141 22 | N. HERAKLIO    | +30210 283 5985, +30210 283 4111/<br>+30210 283 5085 | 99-002  |



| No  | BUSINESS NAME  | DISTINCTIVE TITLE                            | ADDRESS                                     | PC     | CITY                  | TEL./FAX   | REG.NO. |
|-----|--|--|---|--------|-----------------------|--|---------|
| 175 | MOULDIS NIKOLAOS & CO                                    | AIOLOS COURIER SERVICE                       | 1 KERAMEON ST. & 2 LENORMAN ST.             | 104 36 | ATHENS                | +30210 522 0039/ +30210 522 0055                     | 99-126  |
| 176 | MOUTSOU PANAGIOTA  | LESVOS EXPRESS                               | 50 AEROPOROU ST.                            | 811 00 | MITILINI              | +30225 104 6008, +30225 104 5795/<br>+30225 104 6008 | 01-269  |
| 177 | NATSI ZOI  | NATSI ZOI                                    | 3 MITROPOLEOS ST.                           | 521 00 | KASTORIA              | +30246 702 3705/ +30246 702 3705                     | 02-016  |
| 178 | NEOFOTISTOS XRISTOS                                      | NEOFOTISTOS XRISTOS                          | 8 PTOLEMEON ST.                             | 661 00 | DRAMA                 | +30252 102 6766/ +30252 102 6766                     | 01-290  |
| 179 | NIKOLOPOULOU KOUTSOPOULOU<br>CHARALABIA                  | NIKOLOPOULOU KOUTSOPOULOU<br>CHARALABIA      | 7 ARCHIMIDIOS ST.                           | 271 00 | PIRGOS                | +30262 103 1240/ +30262 103 1240                     | 01-249  |
| 180 | NIKOS INGLESIS & CO                                      | NIKOS INGLESIS & CO                          | 1B NAVMACHIAS ELLIS ST.                     | 264 41 | PATRA                 | +30261 042 2102, +30261 043 2560/<br>+30261 043 4297 | 01-262  |
| 181 | NTOKOS GEORGIOS  | NTOKOS GEORGIOS                              | 15 SOULIOU ST.                              | 461 00 | IGOUMENITSA           | +30266 502 6450/ +30266 502 5502                     | 03-009  |
| 182 | NTOULIAS ZACHARIAS                                       | TACHIERGOS COURIER                           | 20 ATH. DIAKOU ST.                          | 157 72 | ZOGRAFOU              | +30210 775 1952/ +30210 775 1952                     | 99-063  |
| 183 | NTROUBOGIANNIS ELEFTHERIOS                               | NTROUBOGIANNIS ELEFTHERIOS<br>KANGA SERVICES | 90 STOA ATH. DIAKOU                         | 851 00 | RHODES                | +30224 103 7555/ +30224 103 6303                     | 99-041  |
| 184 | OFFICE EXPRESS COURIER LTD.                              | OFFICE EXPRESS                               | 91 FILIPPOU ST.                             | 546 35 | THESSALONICA          | +30231 024 5071/ +30231 024 5390                     | 01-203  |
| 185 | OFFICE SERVICE S.A.                                      | OFFICE SERVICE S.A.                          | 11 IOSIF ROGON ST.                          | 117 43 | ATHENS                | +30210 924 7017/ +30210 924 7608                     | 00-155  |
| 186 | OMEGA EVROPEI SIMVOULOI,<br>TOURISTIKES EPICHIRISIS LTD. | INTIGO TOURISM LTD.                          | 8 EFKALIPTON ST.                            | 151 26 | MAROUSSI              | +30210 805 2970                                      | 03-067  |
| 187 | ORBIT COURIER S.A.                                       | ORBIT COURIER S.A.                           | 141 31 <sup>st</sup> km VARIS - KOROPIOU RD | 194 00 | KOROPI                | +30210 662 0999                                      | 03-058  |
| 188 | ORFANIDIS APOSTOLOS                                      | GENESIS COURIER                              | 26 KORITSAS ST.                             | 173 42 | ATHENS                | +30210 996 6661/ +30210 996 6661                     | 99-033  |
| 189 | ORFANOS DIMITRIOS  | EURO POST COURIER SERVICES                   | 51 MONASTIRIOU ST.                          | 546 27 | THESSALONICA          | +30231 054 7776/ +30231 054 7776                     | 99-010  |
| 190 | OSLANITIS CHRISTOS                                       | OSLANITIS CHRISTOS                           | 2 <sup>nd</sup> PARODOS 6 KORAI ST.         | 502 00 | NAOUSA                | +30233 202 9290                                      | 03-015  |
| 191 | P. CHATZIKALIMNIOS - V. KATSOULA CO                      | P. CHATZIKALIMNIOS -<br>V. KATSOULA CO       | 114 PINDAROU ST.                            | 322 00 | THIVA                 | +30226 208 9439                                      | 03-042  |
| 192 | P. MANEADIS - A. PLESSAS CO                              | ATHENS COURIER                               | 12 TROON ST. & 30 ITHAKIS ST.               | 121 33 | PERISTERI             | +30210 572 5538/ +30210 572 5538                     | 01-210  |
| 193 | P. PAPANIKOS - F. SIKARA CO                              | O ERMIS                                      | 1 EMONOS ST. & IRAKLEOUS ST.                | 322 00 | THIVA                 | +30226 208 9210-1/ +30226 208 9213                   | 02-023  |
| 194 | PAFIS KIRIAKOS   | PAFIS KIRIAKOS                               | 10 IOANNINON ST.                            | 691 00 | KOMOTINI              | +30253 103 7424, +30253 103 6466/<br>+30253 108 1500 | 01-194  |
| 195 | PAKO COURIER LTD.  | PAKO COURIER LTD.                            | 3 ATHAN. DIAKOU ST.                         | 567 27 | NEAPOLI THESSALONIKIS | +30231 053 5998, +30231 053 5970/<br>+30231 051 5443 | 99-154  |
| 196 | PANAGIOTIDOU STAVROULA                                   | PANAGIOTIDOU STAVROULA                       | 6 AMERICANIKOU<br>ERITHROU STAVROU ST.      | 652 01 | KAVALA                | +30251 023 2235                                      | 02-073  |
| 197 | PANAGIOTOPOULOS DIMITRIOS                                | PANAGIOTOPOULOS DIMITRIOS                    | 4 BLERI ST.                                 | 303 00 | NAFPAKTOS             | +30263 403 8880/ +30263 403 8881,<br>+30231 054 6238 | 03-068  |



| No  | BUSINESS NAME                       | DISTINCTIVE TITLE                 | ADDRESS                             | PC     | CITY           | TEL./FAX   | REG.NO. |
|-----|-------------------------------------|-----------------------------------|-------------------------------------|--------|----------------|--|---------|
| 198 | PANOU ANDREAS                       | PANOU AIR SERVICE COURIER         | 2 ERMOU ST.                         | 546 25 | THESSALONICA   | +30231 054 6238/ +30231 054 6238                     | 99-027  |
| 199 | PANTELOPOULOU ANASTASIA             | PCI (POST COURIER INTERNATIONAL)  | 3 AGLAVROU ST.                      | 117 42 | ATHENS         | +30210 924 0245/ +30210 924 0332                     | 99-072  |
| 200 | PAPADATOS PANAGIOTIS                | PCS                               | 25 PATREOS ST.                      | 262 21 | PATRA          | +30261 022 2992, +30261 022 1857/<br>+30261 062 0074 | 99-080  |
| 201 | PAPADIMITRIOU EVAGELIA              | QDS                               | 6 KORAI ST.                         | 152 33 | CHALANDRI      | +30210 682 2800/ +30210 682 2884                     | 00-178  |
| 202 | PAPANIKOLAOU PANAGIOTA              | PAPANIKOLAOU PANAGIOTA            | ARCH. MAKARIOU ST. & I METSOVOU ST. | 452 21 | IOANNINA       | +30265 104 4200/ +30265 104 4552                     | 02-064  |
| 203 | PAPPA EVAGELIA                      | TACHIMETAFORES COURIER            | 21 IRINIS AVE.                      | 481 00 | PREVEZA        | +30268 202 9521, +30268 202 1277/<br>+30268 202 1232 | 99-085  |
| 204 | PARAPAREKIS SAVVAS                  | DIAKINISI EXPRESS COURIER         | 5 MILTIADOU ST.                     | 152 32 | CHALANDRI      | +30210 682 6408/ +30210 682 6778                     | 00-173  |
| 205 | PARASKAKIS MICHAIL                  | PARASKAKIS MICHAIL                | 24 GRIGORIOU E'. ST.                | 731 35 | CHANIA         | +30282 103 6001/ +30282 103 8771                     | 02-056  |
| 206 | PERIVOLARIS GEORGIOS                | PERIVOLARIS GEORGIOS              | 28 ADIMANTOU ST.                    | 201 00 | KORINTHOS      | +30274 108 1855/ +30274 102 9580                     | 01-218  |
| 207 | PETROULI ELISSAVET                  | PETROULI ELISSAVET                | 2 KAFKASOU ST.                      | 611 00 | KILKIS         | +30234 107 0226                                      | 03-019  |
| 208 | POLATIDIS GAVRIIL                   | POLATIDIS GAVRIIL                 | 2 KARAIKAKI ST.                     | 585 00 | SKIDRA         | +30238 108 2033/ +30238 108 2038                     | 99-068  |
| 209 | POMONI A. MAVRA                     | ATTICA EXPRESS                    | 95-97 ACHILEOS ST.                  | 176 75 | KALLITHEA      | +30210 941 7340/ +30210 941 5820                     | 99-011  |
| 210 | PONY EXPRESS GREECE LTD.            | PONY EXPRESS LTD.                 | 22 ILIOUPOLEOS AVE.                 | 116 31 | ATHENS         | +30210 927 0700/ +30210 927 0705                     | 99-114  |
| 211 | POST & PRESS BUSINESS SERVICES LTD. | P & P                             | 7 OLIMPIADOS ST.                    | 116 33 | ATHENS         | +30210 756 6011-3/ +30210 756 2664                   | 99-116  |
| 212 | POURIDOU IRINI                      | W. M. COURIER                     | 5 KON KARAMANLI ST.                 | 531 00 | FLORINA        | +30238 502 9655/ +30238 504 5040                     | 03-011  |
| 213 | PRISMA SERVICE LTD.                 | PRISMA SERVICE LTD.               | 28 PINDAROU ST.                     | 175 63 | P. FALIRO      | +30210 985 0474, +30210 985 2660/<br>+30210 983 5101 | 99-091  |
| 214 | PROMOTION DISTRIBUTION SERVICES     | P.D.S. LTD.                       | 13 PROKLOU ST. & PROTAGORA ST.      | 116 35 | ATHENS         | +30210 701 7954, +30210 701 7833/<br>+30210 920 0409 | 99-148  |
| 215 | PSARAKIS NIKOLAOS                   | PSARAKIS NIKOLAOS                 | 8 TZANAKAKI ST.                     | 731 34 | CHANIA         | +30282 105 6532, +30282 104 2860/<br>+30282 105 2954 | 99-049  |
| 216 | R.O. COURIERS LTD.                  | R.O. LTD.                         | 17 ZICHNIS ST. & 23A AIGIOU ST.     | 115 27 | ATHENS         | +30210 748 2211/ +30210 775 1680                     | 99-112  |
| 217 | RACHOULI EVGENIA                    | RACHOULI EVGENIA                  | 13 PLATONOS ST.                     | 383 33 | VOLOS          | +30242 103 8612                                      | 99-147  |
| 218 | RALLIS ANTONIOS                     | RALLIS ANTONIOS,<br>POSTO EXPRESS | 30 DIKASTIRION ST.                  | 681 00 | ALEXANDROUPOLI | +30255 103 5566/ +30255 103 5566                     | 99-009  |
| 219 | RANGOU MERITZANI                    | RANGOU COURIER                    | 6 14 <sup>th</sup> SEPTEMBRIOU ST.  | 581 00 | GIANNITSA      | +30238 202 5859/ +30238 202 7672                     | 00-156  |
| 220 | RAPTIS ATHANASSIOS                  | RAPTIS ATHANASSIOS                | 294 KORINTHOU ST.                   | 262 22 | PATRA          | +30261 033 7733/ +30261 031 7830                     | 99-081  |
| 221 | RAZAFINTRAZAKA DIE - DONE           | BLUE + CROSS                      | 125-127 KIFISSIAS AVE.              | 115 24 | ATHENS         | +30210 699 8100/ +30210 699 4455                     | 00-190  |
| 222 | RENTAS KONSTANTINOS                 | RENTAS KONSTANTINOS               | 18 NIOVIS ST.                       | 212 00 | ARGOS          | +30275 102 0751, +30275 102 2405                     | 99-038  |



| No  | BUSINESS NAME  | DISTINCTIVE TITLE              | ADDRESS                                | PC     | CITY           | TEL./FAX   | REG.NO. |
|-----|--|--------------------------------|--|--------|----------------|--|---------|
| 223 | RIGANAS ALEXANDROS                                   | RIGANAS ALEXANDROS             | 60 PALEOKASTRITSA N. R.                | 491 00 | CORFU          | +30266 104 7463/ +30266 103 0175                                       | 99-035  |
| 224 | RT EXPRESS - COURIER AND POSTAL TRANSPORTATIONS S.A. | R T-EXPRESS                    | 1 POSIDONOS ST. & SOULIOU ST.          | 173 42 | AG. DIMITRIOS  | +30210 994 5234/ +30210 995 8643-4                                     | 99-105  |
| 225 | S. XENODOCHIDIS & CO LTD.                            | SALONICA MACEDONIA SERVICES    | 26 KOLETTI ST.                         | 546 27 | THESSALONICA   | +30231 055 0871-4/ +30231 055 1387                                     | 01-242  |
| 226 | S.K.L. COURIER EXPRESS LTD.                          | S.K.L. COURIER                 | 106 AG. ELEOUSIS ST.                   | 151 25 | MAROUSSI       | +30210 805 6551-2  | 03-017  |
| 227 | SACHINIDOU SOFIA                                     | CITYLINK COURIER               | 41 STR. GENNADIOU ST.                  | 542 49 | THESSALONICA   | +30231 032 0152/ +30231 032 6748                                       | 99-070  |
| 228 | SALONIKIDOU MARIA                                    | PONY EXPRESS                   | 100 GIANNITSON ST.                     | 546 27 | THESSALONICA   | +30231 020 0276/ +30231 051 6809                                       | 02-044  |
| 229 | SARIDAKIS CHRISTOS                                   | SARIDAKIS CHRISTOS             | 24 P. KELAJDI ST.                      | 731 36 | CHANIA         | +30282 109 0089/ +30282 109 0089                                       | 99-028  |
| 230 | SECURITY COURIERS LTD.                               | RADMAIL SECURITY COURIERS LTD. | 30 FARANTATON ST.                      | 115 27 | AMBELOKIPI     | +30210 771 4965, +30210 771 5208/<br>+30210 771 5805                   | 99-131  |
| 231 | SERVANT COURIER LTD.                                 | SERVANT                        | 74 KALLIRROIS ST.                      | 117 41 | ATHENS         | +30210 924 1800/ +30210 924 1800                                       | 99-100  |
| 232 | SINDIASMENES YPIRESIES METAFORON S.A.                | UNITED FREIGHT SERVICES S.A.   | 46 KIFISSIAS ST. & 19 IOUSTINIANOU ST. | 551 34 | KALAMARIA      | +30231 045 8560-2-3/ +30231 045 8565-6                                 | 03-022  |
| 233 | SKARAKI SOUZANA - BEKRI NIKOLIA CO                   | TEAM COURIER SERVICE           | 27 METEORON ST.                        | 116 31 | AG. ARTEMIOS   | +30210 756 4633/ +30210 756 4638                                       | 99-129  |
| 234 | SKOURTIS GEORGIOS                                    | INTEREXPRESS                   | 7 ANTONOPOULOU ST.                     | 382 21 | VOLOS          | +30242 102 7204  | 99-015  |
| 235 | SOLIDAKIS MICHAIL                                    | EXPRESS POST HELLAS            | 62 SOLOMOU ST.                         | 104 32 | ATHENS         | +30210 523 5152/ +30210 522 1381                                       | 00-159  |
| 236 | SOTOS PANAGIOTIS                                     | SOTOS PANAGIOTIS               | 4 GRIGORIOU E' ST.                     | 221 00 | TRIPOLI        | +30271 023 3839/ +30271 023 3839                                       | 02-038  |
| 237 | SOUKIAS GRIGORIOS                                    | SOUKIAS GRIGORIOS              | 195 ANALIPSEOS ST.                     | 382 21 | VOLOS          | +30242 102 0602  | 03-025  |
| 238 | SOURLAS EVAGELOS                                     | UNION MAIL                     | 4G SOLOMONS ST.                        | 383 33 | VOLOS          | +30242 103 3785, +30242 102 4370/<br>+30242 103 2464                   | 99-006  |
| 239 | SPEED AIR INTERNATIONAL TRANSPORTATIONS LTD.         | SPEED AIR                      | 18 TEGEAS ST.                          | 164 52 | ARGIROUPOLI    | +30210 995 1024/ +30210 994 0300                                       | 99-133  |
| 240 | SPEEDEX COURIER S.A.                                 | SPEEDEX                        | 578A VOULIAGMENIS AVE.                 | 164 52 | ARGIROUPOLI    | +30210 994 3400/ +30210 340 7007                                       | 99-121  |
| 241 | SPEEDLINE - COURIER OFFICE LTD.                      | SPEEDLINE                      | 35 LAGADA ST.                          | 546 29 | THESSALONICA   | +30231 055 7036/ +30231 055 7036                                       | 99-106  |
| 242 | SPIRIDAKIS IOANNIS                                   | SPIRIDAKIS IOANNIS             | 2 LACHANA ST. & MITSOTAKI ST.          | 712 02 | HERAKLIO CRETE | +30281 028 3285, +30 281 034 2160/<br>+30281 034 2160, +30261 027 7480 | 00-169  |
| 243 | STAMOULIS IOANNIS                                    | MEDIA PLUS                     | 22 ODISSOU ST.                         | 115 25 | ATHENS         | +30210 691 6352/ +30210 691 6359                                       | 02-065  |
| 244 | STANTZOS DIMITRIOS                                   | STANTZOS DIMITRIOS             | 34 KARAGIANNOPOULOU ST.                | 321 00 | LIVADIA        | +30226 108 7580, +30226 108 7950/<br>+30226 108 7951                   | 01-299  |
| 245 | STAREX GROUP LTD.                                    | STAREX GROUP LTD.              | 43 MESSINIS ST.                        | 165 61 | ANO GLYFADA    | +30210 962 4003/ +30210 962 4000                                       | 02-079  |
| 246 | STATHI POLIXENI                                      | STATHI POLIXENI                | 75 KASSANDROU ST.                      | 601 00 | KATERINI       | +30235 107 8200, +30235 103 0000/<br>+30235 107 8201                   | 99-153  |
| 247 | STATHOPOULOU D. & CO                                 | ICC                            | 19-21 MILON ST.                        | 104 44 | ATHENS         | +30210 515 3896/ +30210 512 9885                                       | 99-119  |



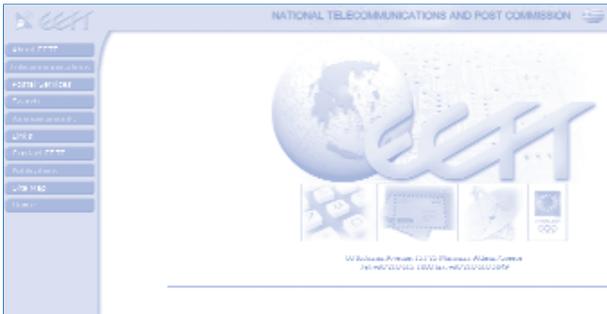
| No  | BUSINESS NAME   | DISTINCTIVE TITLE                              | ADDRESS                        | PC     | CITY           | TEL./FAX  | REG.NO. |
|-----|---|--|--------------------------------|--------|----------------|---|---------|
| 248 | STAVRAKIS ANTONIOS  | STAVRAKIS ANTONIS                              | 227-229 AL. IPSILANTOU ST.     | 262 22 | PATRA          | +30261 033 8123   | 99-050  |
| 249 | TAMBAKOPOULOS NIKOLAOS  | TAMBAKOPOULOS NIKOLAOS                         | EM. PAPPAS ST. & VENIZELOU ST. | 591 00 | VERIA          | +30233 102 3450   | 02-010  |
| 250 | TASIOULAS V. - BITCHAVAS CH. CO   | COURIERS                                       | 3 POULITSA ST.                 | 452 21 | IOANNINA       | +30265 102 2611   | 03-030  |
| 251 | TASKOS ANASTASSIOS  | TASKOS ANASTASSIOS                             | 4 IP. GIAKA ST.                | 582 00 | EDESSA         | +30238 102 7963/ +30238 105 1171                                      | 02-058  |
| 252 | TASSIOPOULOS STAVROS  | COYOTE SERVICES                                | 240 I. DROSSOPOULOU ST.        | 111 41 | PATISSIA       | +30210 201 9440/+30 210 223 0186                                      | 02-055  |
| 253 | TECHNOKATHARISTIKI FLASH S.A.   | TECHNOKATHARISTIKI FLASH S.A.                  | 225 MONASTIRIOU ST.            | 546 28 | THESSALONICA   | +30231 055 5061-2/ +30231 055 6187                                    | 99-087  |
| 254 | TH. TSEVAS - N. DIMOSTHENOUS CO   | PROMONET MARKETING SOLUTIONS CO                | 8 VOURNAZOU ST.                | 115 21 | ATHENS         | +30210 640 0367/ +30210 640 0368                                      | 03-010  |
| 255 | THEODOSIS G. & CO   | POST COURIER INTERNATIONAL (PCI)               | 16 RIGA FERRAIU ST.            | 262 23 | PATRA          | +30261 024 1100/ +30261 027 7480                                      | 01-226  |
| 256 | TNT SKYPACK HELLAS LTD.   | TNT SKYPACK HELLAS LTD.                        | 7 Z                            | 167 77 | ELLINIKO       | +30210 894 0062/ +30210 898 0945                                      | 99-110  |
| 257 | TOBOULI LIGERI  | GRAND EXPRESS COURIER                          | 20 GIANNAKOPOULOU ST.          | 561 23 | THESSALONICA   | +30231 074 9495, +30231 073 0101                                      | 00-184  |
| 258 | TOURLOS PANAGIOTIS  | TOURLOS PANAGIOTIS                             | ADAMANTAS MILOU                | 848 00 | MILOS          | +30228 702 8033/ +30228 702 2418                                      | 03-046  |
| 259 | TRANSPORTATION COMPANY - WAREHOUSING - DISTRIBUTION- POSTAL SERVICES LTD. | IKAROS LTD.                                    | 7.5 km NAOUSSA VERIA           | 591 00 | VERIA          | +30233 109 3516-17/ +30233 109 3518                                   | 01-209  |
| 260 | TRUST MAIL COURIER LTD.   | TRUST MAIL LTD.                                | 19 KOROMILA AVE.               | 117 45 | N. KOSMOS      | +30210 924 2080/ +30210 924 6637                                      | 99-134  |
| 261 | TSABAS N. GEORGIOS  | KINISSI EXPRESS                                | 6 IPSILANTOU ST.               | 163 41 | ILIOUPOLI      | +30210 996 4084/ +30210 996 4084                                      | 99-146  |
| 262 | TSANGOPOULOS SOTIRIOS   | CASTOR EXPRESS COURIER                         | 70 ATH.DIAKOU ST.              | 521 00 | KASTORIA       | +30246 708 3083/ +30246 708 3083,<br>+30210 262 1079                  | 99-039  |
| 263 | TSARBOU EKATERINI   | PACIFIC COURIER                                | 21 ARISTODIMOU ST.             | 106 76 | ATHENS         | +30210 729 5136-7/ +30210 729 5139                                    | 99-026  |
| 264 | TSIMOS EVANGELOS  | ART SPEED                                      | 8 VITSI ST.                    | 566 26 | SIKIES         | +30231 063 0230   | 03-003  |
| 265 | TSINTERI MARIA CO   | REM TSINTERI S.A. N.S.C - NORTH SUBURB COURIER | 26 KONSTANTINOPOLEOS ST.       | 145 72 | AGIOS STEFANOS | +30210 814 1720/ +30210 622 9537                                      | 99-124  |
| 266 | TSIORIS SPIRIDON  | ATHENS COURIER                                 | 21 MEINTANI ST.                | 117 41 | ATHENS         | +30210 924 3240   | 01-272  |
| 267 | TSIRONI VASSILIKI   | TSIRONI VASSILIKI                              | 24 RIGA FERRAIU ST.            | 272 00 | AMALIADA       | +30262 202 9777   | 03-032  |
| 268 | TSITOTAS G. & CO  | UNION MAIL                                     | 22 AERODROMIOU ST.             | 412 21 | LARISSA        | +30241 028 3565, +30241 028 5490,<br>+30241 028 9233/ +30241 028 3927 | 99-096  |
| 269 | TSITSIMPIKOS VASSILIOS  | TSITSIMPIKOS VASSILIOS                         | 56 D. LAPPA ST.                | 431 00 | KARDITSA       | +30244 107 9400-2   | 02-017  |
| 270 | TSOBANIDIS ANDREAS  | TSOBANIDIS ANDREAS                             | 15 LOCH. DIAMANTI ST.          | 682 00 | ORESTIADA      | +30255 202 2227/ +30255 202 2077                                      | 03-041  |
| 271 | TSOULOU LIS AN. IOANNIS   | TSOULOU LIS AN. IOANNIS                        | 4 K. PIITI ST.                 | 650 01 | KAVALA         | +30251 023 2623/ +30251 023 2623,<br>+30231 070 4222                  | 99-051  |



| No  | BUSINESS NAME                    | DISTINCTIVE TITLE                               | ADDRESS                               | PC     | CITY           | TEL./FAX   | REG.NO. |
|-----|----------------------------------|---|---------------------------------------|--------|----------------|--|---------|
| 272 | TZIMI ATHINA                     | TZIMI ATHINA                                    | 55 ANAST. TAVOULARI ST.               | 291 00 | ZAKINTHOS      | +30269 502 9596/ +30269 504 9307                     | 02-011  |
| 273 | U.D.F. COURIER LTD.              | U.D.F.  | 134 MEGALOU ALEXANDROU ST.            | 104 35 | ATHENS         | +30210 342 7400/ +30210 342 7420                     | 01-191  |
| 274 | UNITED COURIER SERVICES LTD.     | UNITED COURIER SERVICES                         | SINGROU AVE. & 3 PINDOU ST.           | 177 78 | KALLITHEA      | +30210 953 7416-8/ +30210 958 6115                   | 01-297  |
| 275 | UPS OF GREECE INC. S.A.          | UPS   | 98A ALIMOU ST.                        | 164 52 | ARGIROUPOLI    | +30210 998 4100/ +30210 998 4199,<br>+30261 027 7480 | 99-120  |
| 276 | UTA COURIER LTD.                 | UTA COURIER LTD.                                | 7 LITOUS ST.                          | 546 28 | THESSALONICA   | +30231 053 0607/ +30231 053 0617                     | 99-103  |
| 277 | VAGIANOU EVGENIA                 | THELIMATA                                       | 55 AFRODITIS ST.                      | 166 73 | VOULA          | +30210 899 6096-7/ +30210 899 6048                   | 02-015  |
| 278 | VAGIAS CHRISTOS                  | VAGIAS CHRISTOS -EUROSEND                       | 53A CHATZIARGIRI ST. - G. KARTALI ST. | 380 01 | VOLOS          | +30242 103 8928/ +30242 103 8928                     | 99-013  |
| 279 | VARDAKIS NIKOLAOS                | VARDAKIS NIKOLAOS                               | GONIES KATHARADES AG. IOANNIS         | 722 00 | IERAPETRA      | +30284 202 6602/ +30284 202 5151                     | 02-078  |
| 280 | VASSILAKAKI ANASTASIA            | VASSILAKAKI ANASTASIA                           | 60 IOAKIM KAVIRI ST.                  | 681 00 | ALEXANDROUPOLI | +30255 103 7879/ +30255 103 8789                     | 00-186  |
| 281 | VELIMVASSAKIS STAVROS            | VELIMVASSAKIS STAVROS                           | 3 GAVRIIL ST.                         | 721 00 | AG. NIKOLAOS   | +30284 108 2902/ +30284 102 2871                     | 01-198  |
| 282 | VEVOPOULOS ALEXANDROS            | IPIRO-TRANS- EPIRUS COURIER                     | 38 ARCH. MAKARIOU ST.                 | 452 21 | IOANNINA       | +30265 103 9777/ +30265 103 9777                     | 99-058  |
| 283 | VLACHOS AGGELOS                  | FAST ANGEL                                      | 60 PALAIAS KAVALAS ST.                | 122 43 | AIGALEO        | +30210 531 0991                                      | 03-051  |
| 284 | VLACHOS GEORGIOS                 | ATHENS COURIER                                  | 68 THIRAS ST.                         | 188 21 | KORIDALLOS     | +30210 544 8847, +30210 544 3774/<br>+30210 544 8847 | 02-068  |
| 285 | VOGINDROUKAS KONSTANTINOS & BROS | VOGINDROUKAS KONSTANTINOS<br>& BROS             | 3 FILOTA ST.                          | 621 22 | SERRES         | +30232 109 7717/ +30232 109 7718                     | 02-006  |
| 286 | VOULGARI OURANIA                 | VOULGARI OURANIA DOCUMENTS<br>AND ITEMS COURIER | 20 KARAOI DIMITRIOU ST.               | 546 30 | THESSALONICA   | +30231 054 4847/ +30231 054 4398                     | 99-144  |
| 287 | VRISSANAKI IRINI                 | VRISSANAKI IRINI                                | 17 SMIRILIOU ST.                      | 712 01 | HERAKLIO CRETE | +30281 031 7570/ +30281 025 3659                     | 02-057  |
| 288 | VRISSANAKIS MICH. EMMANOUIL      | CRETA COURIER                                   | 16 GIAMALAKI ST.                      | 712 02 | HERAKLIO CRETE | +30281 028 1020, +30281 028 2520/<br>+30281 028 1020 | 99-079  |
| 289 | WORLD COURIER (GREECE) LTD.      | WORLD COURIER (GREECE) LTD.                     | 37 KAPETAN CHRONA ST.                 | 115 25 | ATHENS         | +30210 675 6517-9/ +30210 675 6909                   | 99-098  |
| 290 | XIDIS NIKOLAOS                   | XIDIS NIKOLAOS                                  | 4 CHAINA AVE.                         | 341 00 | CHALKIDA       | +30222 108 7587/ +30222 107 8131                     | 99-025  |
| 291 | ZARIFIS N. & CO                  | SWIFT MAIL                                      | 8 AMINTA ST. & PTOLEMEON ST.          | 116 35 | ATHENS         | +30210 725 6600, +30210 723 9769/<br>+30210 722 5963 | 99-141  |
| 292 | ZAIRIS D. - ZORGIANOS CH. CO     | SPACE COURIER                                   | 4 IGIAS ST.                           | 104 46 | ATHINA         | +30210 825 9676/ 274 102 8663                        | 03-031  |
| 293 | ZANNETIS GEORGIOS                | ZANNETIS GEORGIOS                               | 87 CANADA ST.                         | 851 00 | RHODES         | +30224 107 4229/ +30224 107 4229                     | 02-072  |
| 294 | ZARKADA MARINA                   | ZARKADA MARINA                                  | 1 <sup>st</sup> km GREVENA - KOZANI   | 511 00 | GREVENA        | +30246 208 3039                                      | 02-048  |
| 295 | ZIRAS IOANNIS & CO               | SPOURGITIS TRANS                                | 194 ATHINON ST.                       | 241 00 | KALAMATA       | +30272 102 2266/ +30272 109 0068                     | 01-219  |
| 296 | ZOUROUDI GEORGIA                 | ZOUROUDI GEORGIA                                | 76 AP. PAVLOU ST.                     | 851 00 | RHODES         | +30224 106 5142, +30224 106 5832/<br>+30224 106 5142 | 01-205  |

## Appendix VI

### EETT Website Map

|   |  |   |
|---|--|---|
|  |  | <ul style="list-style-type: none"> <li>▶ EETT Decisions regarding Postal Services Provision</li> <li>▶ Greek Legislation - Regulatory Texts</li> <li>▶ European Legislation - Regulatory Texts</li> <li>▶ Postal Market Study-Survey</li> <li>▶ EETT Announcements</li> </ul> |
| <b>EETT - Organisation</b>  |  | <b>Search</b>   |
| ▶ What is EETT  |  | ▶ Search  |
| ▶ Structure   |  |   |
| ▶ Responsibilities  |  | <b>News - Announcements</b>   |
|   |  | ▶ News - Announcements  |
| <b>Telecommunications</b>   |  | <b>Links</b>  |
| ▶ Licensing   |  | ▶ Links   |
| ▶ Numbering   |  |   |
| ▶ Wireless Communications   |  | <b>Contact EETT</b>   |
| ▶ Leased Lines  |  | ▶ Contact EETT  |
| ▶ Local Loop Unbundling (LLU)   |  | <b>Publicity</b>  |
| ▶ Legislative Framework   |  | ▶ Press Releases  |
| ▶ Interconnection   |  | ▶ Information Days - Events   |
| ▶ Electronic Signatures   |  | ▶ EETT Annual Reports   |
| ▶ Domain Names  |  | ▶ Communications in Summary   |
| ▶ Universal Service   |  | ▶ Information Leaflets  |
| ▶ Telecommunications Equipment  |  | ▶ EETT and CSF III  |
| ▶ Charges   |  |   |
| ▶ Markets Analysis  |  | <b>Jobs</b>   |
| ▶ ATHENS 2004 Olympic Games   |  | ▶ Job opportunities   |
| <b>Postal Services Market</b>   |  | <b>Greek Version</b>  |
| ▶ Registries of Postal Companies  |  | ▶ Greek version   |



## Appendix VII

### Abbreviations Table

|                           |  |
|---------------------------|--|
| <b>3<sup>rd</sup> CSF</b> | <b>3<sup>rd</sup> Community Support Framework</b>                                    |
| <b>ACN</b>                | <b>Accompanying Courier Note</b>   |
| <b>ADCO</b>               | <b>Administrative Cooperation Group</b>  |
| <b>ADSL</b>               | <b>Asymmetric Digital Subscriber Line</b>  |
| <b>AIA</b>                | <b>Athens International Airport</b>  |
| <b>ANRC</b>               | <b>National Regulatory Authority for Communications of Romania</b>                   |
| <b>AOB</b>                | <b>Athens Olympic Broadcasting</b>   |
| <b>ATHOC</b>              | <b>ATHENS 2004 Olympic Games Organising Committee</b>                                |
| <b>AUTH</b>               | <b>Aristotle University of Thessalonica</b>  |
| <b>BP</b>                 | <b>Business Plan</b>   |
| <b>CAA</b>                | <b>Civil Aviation Authority</b>  |
| <b>CB</b>                 | <b>Citizen Band</b>  |
| <b>CEPT</b>               | <b>Conférence Européene des Postes et Télécommunications</b>                         |
| <b>COC</b>                | <b>Charter of Obligations to the Consumer</b>  |
| <b>COCOM</b>              | <b>COmmunication COmmitte</b>  |
| <b>CSP</b>                | <b>Certification Service Provider</b>  |
| <b>CSS</b>                | <b>Consumer Service Sector</b>   |
| <b>DNS</b>                | <b>Domain Name System</b>  |
| <b>EBU</b>                | <b>European Broadcasters Union</b>   |
| <b>ECC</b>                | <b>Electronic Communication Committee</b>  |
| <b>EESSI</b>              | <b>European Electronic Signature Standardisation Initiative</b>                      |
| <b>ENG/OB</b>             | <b>Electronic News Gathering/ Outside Broadcasting</b>                               |
| <b>ERG</b>                | <b>European Regulators Group</b>   |
| <b>ERP</b>                | <b>Enterprise Resource Planning</b>  |
| <b>ERT</b>                | <b>Hellenic Radio and Television S.A.</b>  |
| <b>EU</b>                 | <b>European Union</b>  |
| <b>FB</b>                 | <b>Fire Brigade</b>  |
| <b>FDC-HC</b>             | <b>Fully Distributed Cost with the Historic Cost as a cost basis</b>                 |
| <b>FESA</b>               | <b>Forum of European Supervisory Authorities for Electronic Signatures</b>           |
| <b>FMS</b>                | <b>Fixed Monitoring Stations</b>   |
| <b>FORTH-ICS</b>          | <b>Foundation for Research and Technology Hellas - Institute of Computer Science</b> |
| <b>FRIACO</b>             | <b>Flat Rate Internet Access Call Origination</b>                                    |
| <b>FWA</b>                | <b>Fixed Wireless Access</b>   |
| <b>GCPI</b>               | <b>General Consumer Price Index</b>  |
| <b>GG</b>                 | <b>Government Gazette</b>  |
| <b>GIS</b>                | <b>Geographical Information System</b>   |



|                 |  |
|-----------------|--|
| <b>GRNET</b>    | <b>Greek Research and Technology Network</b>                                   |
| <b>HAEC</b>     | <b>Hellenic Atomic Energy Commission</b>                                       |
| <b>HAFGS</b>    | <b>Hellenic Airforce General Staff</b>   |
| <b>HAGS</b>     | <b>Hellenic Army General Staff</b>   |
| <b>HCG</b>      | <b>Hellenic Coastguard</b>   |
| <b>HNDGS</b>    | <b>Hellenic National Defense General Staff</b>                                 |
| <b>HNGS</b>     | <b>Hellenic Navy General Staff</b>   |
| <b>HRT</b>      | <b>Hellenic Radio and Television (ERT) S.A.</b>                                |
| <b>IIG</b>      | <b>Internet Informal Group</b>   |
| <b>IIS</b>      | <b>Integrated Information System</b>   |
| <b>ILS</b>      | <b>Instrument Landing System</b>   |
| <b>IN</b>       | <b>Intelligent Network</b>   |
| <b>IOC</b>      | <b>International Olympic Committee</b>   |
| <b>IPC</b>      | <b>International Post Corporation</b>  |
| <b>IRG</b>      | <b>Independent Regulators Group</b>  |
| <b>IS</b>       | <b>Information Society</b>   |
| <b>ISDN</b>     | <b>Integrated Services Digital Network</b>                                     |
| <b>ISP</b>      | <b>Internet Service Provider</b>   |
| <b>ITU</b>      | <b>International Telecommunication Union</b>                                   |
| <b>ITU-R</b>    | <b>International Telecommunication Union – Radiocommunications</b>             |
| <b>JC</b>       | <b>Japan Consortium</b>  |
| <b>JMD</b>      | <b>Joint Ministerial Decision</b>  |
| <b>LLU</b>      | <b>Local Loop Unbundling</b>   |
| <b>LRAIC-CC</b> | <b>Long-Run Average Incremental Cost with the Current Cost as a cost basis</b> |
| <b>LRIC</b>     | <b>Long Run Incremental Cost</b>   |
| <b>MA</b>       | <b>Management Authority</b>  |
| <b>MD</b>       | <b>Ministerial Decision</b>  |
| <b>MEPPPW</b>   | <b>Ministry of Environment, Physical Planning and Public Works</b>             |
| <b>MES</b>      | <b>Mobile Earth Station</b>  |
| <b>MMM</b>      | <b>Ministry of Mercantile Marine</b>   |
| <b>MMS</b>      | <b>Multimedia Message Service</b>  |
| <b>MTC</b>      | <b>Ministry of Transportation and Communications</b>                           |
| <b>MWP</b>      | <b>Monitoring Work Plans</b>   |
| <b>NAMCR</b>    | <b>National Antenna Mast Construction Registry</b>                             |
| <b>NB</b>       | <b>Notified Bodies</b>   |
| <b>NBC</b>      | <b>National Broadcasting Corporation</b>                                       |
| <b>NCC</b>      | <b>National Control Center</b>   |
| <b>NFAC</b>     | <b>National First Aid Center</b>   |
| <b>NFAT</b>     | <b>National Frequency Allocation Table</b>                                     |



|               |  |
|---------------|--|
| <b>NIS</b>    | <b>National Intelligence Service</b>   |
| <b>NNP</b>    | <b>National Numbering Plan</b>   |
| <b>NRA</b>    | <b>National Regulatory Authority</b>   |
| <b>NRDNP</b>  | <b>National Reference Database on Number Portability</b>                           |
| <b>NRFR</b>   | <b>National Radio Frequencies Registry</b>   |
| <b>NRFZA</b>  | <b>National Regulation on Frequency Zones Allocation</b>                           |
| <b>NRTC</b>   | <b>National Radio – Television Council</b>   |
| <b>NSMMS</b>  | <b>National Spectrum Management and Monitoring System</b>                          |
| <b>NSS</b>    | <b>National Statistical Service</b>  |
| <b>NTUA</b>   | <b>National Technical University of Athens</b>                                     |
| <b>OECD</b>   | <b>Organisation for Economic Cooperation and Development</b>                       |
| <b>OGSD</b>   | <b>Olympic Games Security Division</b>   |
| <b>OJ</b>     | <b>Official Journal</b>  |
| <b>ONP</b>    | <b>Open Network Provision</b>  |
| <b>OP-IS</b>  | <b>Operational Plan "Information Society"</b>                                      |
| <b>PDC</b>    | <b>Postal Directive Committee</b>  |
| <b>PIBs</b>   | <b>Principles of Implementation and Best Practice</b>                              |
| <b>PISTTS</b> | <b>Postal Items Special -Track and Trace- System</b>                               |
| <b>PMR</b>    | <b>Private Mobile Radio</b>  |
| <b>PPP</b>    | <b>Purchasing Power Parities</b>   |
| <b>PSA</b>    | <b>Point of Service Activation</b>   |
| <b>PSTN</b>   | <b>Public Switched Telephone Network</b>   |
| <b>RTTE</b>   | <b>Radio Equipment and Telecommunications Terminal Equipment</b>                   |
| <b>RCC</b>    | <b>Regional Control Center</b>   |
| <b>RIO</b>    | <b>Reference Interconnection Offer</b>   |
| <b>RR</b>     | <b>Radio Regulation</b>  |
| <b>SMS</b>    | <b>Short Message Service</b>   |
| <b>SNG</b>    | <b>Satellite News Gathering</b>  |
| <b>SRDs</b>   | <b>Short Range Devices</b>   |
| <b>TCAM</b>   | <b>Telecommunication Conformity Assessment &amp; Market Surveillance Committee</b> |
| <b>UMTS</b>   | <b>Universal Mobile Telecommunication System</b>                                   |
| <b>US</b>     | <b>Universal Service</b>   |
| <b>USP</b>    | <b>Universal Service Provider</b>  |
| <b>VNO</b>    | <b>Virtual Network Operator</b>  |
| <b>VPN</b>    | <b>Virtual Private Networks</b>  |
| <b>VSAT</b>   | <b>Very Small Aperture Terminals</b>   |
| <b>W-LAN</b>  | <b>Wireless Local Area Network</b>   |
| <b>WRC</b>    | <b>World Radiocommunication Conference</b>   |
| <b>WSP</b>    | <b>Work Surveillance Plan</b>  |