



EETT

HELLENIC TELECOMMUNICATIONS & POST COMMISSION

ANNUAL
REPORT

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2007 BROADBAND
YEAR



HELLENIC TELECOMMUNICATIONS & POST COMMISSION

Annual Report 2007

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Note: Look up in the Glossary for the meaning of terms used in the text marked with blue color (p.87).



HELLENIC TELECOMMUNICATIONS & POST COMMISSION

ADMINISTRATION

The presented Annual Report informs about the activities of the Hellenic Telecommunications & Post Commission (EETT) for the period from the 1st of January until the 31st of December 2007. During this period the composition of EETT appeared as follows:

Nikitas Alexandridis
President

Nikolaos Koulouris
Vice President for the Electronic
Communications Sector

Thodoris Dravillas
Vice President for the
Postal Services Sector

Panagiotis Kottis
Member

Ioannis Paleologos
Member

Symeon Papavasileiou
Member

Michael Sakkas
Member

Panagiotis Tsanakas
Member

Georgios Tsaprounis
Member

President's Message

2007, which was nominated as Broadband Year by the Greek Prime Minister, was unquestionably a significant year for the Electronic Communications market in Greece. Broadband was one of EETT's main priorities as well, taking into consideration the emphasis that the Greek State laid upon the development of broadband. Furthermore, ensuring fair competition and protecting consumer's rights were two major courses of actions for EETT.

More specifically, on the part of the National Regulator, 2007 was the "implementation year" of the regulatory framework, leading to a change in the market model from reselling services to competition through investments in infrastructures, bringing about a growth "avalanche" which is further corroborated, inter alia, by the following facts:

- Greece is one of the fastest developing markets in the European Union (EU).
- The threshold of 1,000,000 broadband lines has been exceeded.
- Local Loop Unbundling (LLU) lines have increased more than tenfold.

The milestone for 2007 was the actual Unbundling of the Local Loop. The new Reference Unbundling Offer (RUO) together with the Reference Broadband Offer (RBO) contributed to the strengthening of the competition in the Electronic Communications. The RUO, in particular, has shaped the conditions so that the alternative providers can develop and provide, new and innovative for the Greek standards, double-play and triple-play products, offering to the consumer a number of choices in competitive prices. The rapid growth of the LLU is mentioned in the 13th Report of the European Commission, where the work of EETT is characterized as successful and special reference is made to the promotion of Physical Collocation and the fast growth of the Greek broadband market.

During 2007, EETT, aiming at the promotion and smooth operation of competition in the Electronic Communications' networks and services, undertook actions related to Interconnection, the completion of OTE's cost audit and the tariff policy of the operators. Under the same scope, it imposed fines on the Electronic Communications' operators for infringing the legislation in force and not abiding by the competition rules on LLU and Carrier Pre-selection issues. With reference to its regulatory role, EETT completed the competition analysis of the individual markets of Electronic Communications, as

well as the majority of the actions required for the incorporation of the secondary legislation into the new regulatory framework.

At the same time, having placed the consumer at the centre of its work, EETT gave high priority to issues concerning the protection and information of the consumers. In this context, it approved the Code of Practice for Carrier Pre-selection, completed the necessary actions for issuing, in 2008, the Regulation for the Quality Indicators of Electronic Communications, determined the conditions for providing Internet services and took measures for the protection of consumers from dialers. Furthermore, the actions of EETT resulted in significant benefits for consumers, such as the reduction of fixed and mobile termination rates and of International Roaming tariffs.

In addition, under the scope of the proper market operation and the protection of consumer rights, EETT assessed the complaints filed by them, in order to detect issues which called for its regulatory and supervisory intervention. Hence, it conducted audits of the sector operators in order to ensure the observance of the legislation and their obligations towards consumers. Lastly, it implemented a significant number of actions aimed at informing consumers adequately about issues of immediate interest.

In the radiofrequency sector, EETT proceeded in 2007 with the issue of new Regulations, as specified by Law 3431/2006, regarding the regulation of issues related to radiofrequencies. Furthermore, it submitted to the Ministry of Transport and Communications (MTC) Recommendations for the issue of the respective Ministerial Decisions (MD). With the objective of making more effective the overall licensing procedure for antenna construction, EETT has elaborated Proposals to the MTC regarding the definition of a special licensing procedure and the licensing exception of special types of antenna constructions, that are characterized by low levels of electromagnetic energy transmission.

Furthermore, due to the new responsibilities it was assigned regarding the installation and operation conditions for TV stations, pursuant to Law 3548/2007, EETT proceeded with the issue of the necessary Decisions. As far as spectrum management and monitoring is concerned, EETT carried on recording the operating private stations and imprinting their installations in Broadcasting Centres whereas, in co-operation with co-responsible Authorities, it conducted operations

for the closure of illegal stations and the prevention of interferences.

In the Postal Services sector, EETT conducted a comparative study of the characteristics of the Greek market and the developed markets of the EU, aiming at utilizing the results for the review of the regulatory framework in the Postal Services sector, which will take place in 2008. With regard to the Universal Service (US), EETT worked with the Universal Service Provider (USP) for the implementation of a new cost accounting system, which will contribute to the creation of a more transparent and reliable cost accounting framework.

Additionally, it laid emphasis upon its supervisory work, conducting scheduled and unscheduled investigations (autopsies) of Postal Services providers, in order to ensure the quality of the provided services and the smooth operation of the market. The information seminars that EETT conducted in Athens, Thessalonica and Patras were very important in order to inform adequately all market participants about the proper implementation of the regulatory framework and the crucial issues of the sector.

Taking into account that, as mentioned before, 2007 was nominated as broadband year and was marked by significant successes and positive developments in the Electronic Communications sector, I would like to conclude this brief introduction by presenting EETT's regulatory strategy for the following years. Our vision is "the creation of a completely liberalized and competitive Electronic Communications market, based on a stable and predictable regulatory environment, so as to attract investments in broadband network infrastructures, which will improve citizens' quality of life and facilitate the development of innovative and exportable services provided through the Internet".

Starting in 2008 and with a time horizon until 2011, we will pursue the realization of our vision based on 5 basic strategic objectives:

1. The encouragement of competition at the level of Services.
2. The development of full competition in Infrastructures, permitting Equality of Access and encouraging the development of advanced technologies.
3. The improvement of spectrum availability and the creation of advanced infrastructure in wireless

networks, in order to promote efficient use, foster competition and develop innovation.

4. The safeguarding of the availability of innovative services to consumers, such as triple-play products, IPTV and Video on Demand, as well as the wireless and mobile broadband Internet.
5. The safeguarding of the benefits to consumers in terms of quality of service, availability of networks and transparency of information.

These specific strategic objectives are framed by short-term and medium-term goals and supported by numerous actions, which are part of EETT's Operational Plan. The most immediate actions relate to the new market analysis, the accounting separation of OTE, the reduction of termination rates, the Leased Lines Regulation, the assessment of a potential separation of OTE's network and services, the expansion of the use of GSM band for 3rd Generation networks and services, the evaluation of the spectrum use, the expansion of spectrum monitoring in the regional areas of Greece etc.

In 2007, we witnessed an impressive development of broadband, acknowledging, however, that we still lag far behind the advanced EU countries, in terms of broadband. Convergence is not an unrealistic goal; however it requires that all involved parties intensify and co-ordinate their efforts: us, the Greek State, the providers, the local communities and the social organizations. Towards this common objective, the role of EETT as the National Regulator of the Electronic Communications is crucial. And it will be more decisive, provided that it is bolstered by the necessary institutional tools from the Greek State, which will allow EETT to perform more effectively its regulatory and supervisory work for the benefit of the consumers, the market and the national economy.

Professor Nikitas Alexandridis

President of EETT

June 2008



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Introduction



Electronic Communications Sector

In 2007, EETT focused its actions on two basic keystones: (i) broadband growth in Greece and (ii) safeguarding the sound competition, as well as protecting consumers rights.

Towards that direction, broadband continued to be one of the basic priorities of EETT and the co-ordinated interventions of the latter contributed to further strengthening the market and boosting the competition. It is worth mentioning that, 2007 was inaugurated as Broadband Year by the Greek Prime Minister, Mr. K. Karamanlis, a fact that reflects the emphasis laid upon the digital growth of Greece by the state.

The new Reference Offer for Local Loop Unbundling (LLU) set the basis for the development of effective competition in the broadband market, as well as to the broader market of Electronic Communications. At the same time, the Reference Broadband Offer (RBO) created the appropriate conditions for the competitive rendering of retail broadband services.

Significant progress was also made regarding the Rights of Way, Installation and Operation of Electronic Communications networks. Specifically, EETT, having registered the market's views, submitted a Proposal to the Ministry of Transport and Communications (MTC) for the issue of a Joint Ministerial Decision (JMD). The issue of this JMD is expected to facilitate the investments in the broadband market.

EETT proceeded to further actions for the promotion and the sound operation of competition in Electronic Communications networks and services. Under this scope, it approved OTE's new Reference Interconnection Offer (RIO) and also, imposed sanctions on operators of Electronic Communications for infringing the current legislation and not abiding by the competition rules on LLU and Carrier Pre-Selection issues. Furthermore, an important action for the market was the completion of the 2007 cost audit in time and the publication of the cost-audited invoices for the regulated services.

EETT, within the boundaries of its regulatory role, completed the competition market analysis for the individual markets of Electronic Communications and acted accordingly for the adaptation of the secondary legislative framework to Law 3431/2006, which is a part of the general effort for the harmonization of the Greek legislation to the European Regulatory Framework.

At the same time, it set the issues for the protection and information of the consumers on a high priority level. In co-operation with the operators of Electronic Communi-

cations, EETT approved the Code of Practice for Carrier Pre-Selection and also, completed the necessary actions for the issue, within 2008, of a Regulation regarding the Quality Indicators of Electronic Communications. The reduction of the mobile and fixed termination rates and the International Roaming rates resulted in significant benefits for the consumers.

Additionally, EETT during this year assessed the complaints filed by consumers in order to detect issues that called for its intervention and proceeded to regulatory and monitoring actions for ensuring consumers' rights. It also carried out audits on sector operators in order to safeguard the observance of the legislation and their obligations towards the consumers. Finally, it conducted an important number of information campaigns aiming at the sufficient briefing of consumers on subjects that concern them directly, such as the broadband Internet and the quality of Electronic Communications services.

The important progress of Greece is corroborated by the conclusions of the 13th Report of the European Commission. The Report makes reference to EETT's work regarding the implementation of the Law on Electronic Communications and the issue of the anticipated secondary legislation. The work done by EETT is characterized as successful and the main emphasis is put on the rapid growth of the Greek broadband market, the promotion of Physical Collocation and the fast growth of LLU.

Radio Spectrum Sector

2007 has been essentially the first year of the full enforcement of the new regulatory framework for radiofrequency spectrum issues, in accordance to the provisions of Law 3431/2006. Specifically, EETT completed all the necessary Regulations and the foreseen Proposals to MTC for the issuance of Ministerial Decisions (MD).

In the same context and following a preset goal, EETT successfully incorporated the new regulations in the daily work for spectrum management –licensing, monitoring, and inspection- and impartially continued to meet the increased market needs. The new framework removed the administrative constraints applicable in the past, leading to increased access capabilities for more spectrum users. At the same time, the conversion of the majority of Individual Licences granted to operators of Electronic Communications networks or services to Radiofrequency Rights of Use was completed.

Furthermore, in order for the antenna construction licensing framework to become more effective, EETT ela-



borated Proposals to MTC regarding the definition of a special licensing procedure and the licensing exception of special types of antenna constructions that are characterized by low transmission level of electromagnetic energy.

EETT has also been assigned new responsibilities in relation to the granting of Radiofrequency Rights of Use to TV stations. In order to exercise its responsibilities, EETT carried out a Public Consultation, the completion of which will lead to the issue of the related Regulation.

Among the goals set for 2007, was the more efficient exercise of its spectrum management and monitoring responsibilities. Towards that direction and taking into consideration the problems of the last years, EETT took actions for the inspection and licensing of fixed links all over the Territory. Within the same framework, the recording of the operating private stations and the imprint of their installations in Broadcasting Centres continued, aiming at the consequent removal by the responsible parties of the illegal containers from the Broadcasting Centres that constitute a shelter for illegal broadcasts.

At the same time and in co-operation with the co-responsible Authorities, EETT carried out a considerable number of operations for the closure of illegal stations, in order to avoid interferences and establish legitimacy. Emphasis has also been laid upon the location and elimination of interferences in the spectrum used by services related to the safety of human life and by state security networks and emergency services.

Furthermore, EETT continued the intensive inspections for the location of illegal antenna installations. In parallel, EETT carried out information actions for public, on wireless communications, antenna issues and the rational use of wireless devices.

Targeting the optimum spectrum monitoring and inspection, EETT studied and prepared a plan for the operational opening of regional monitoring offices, since for the time being the coverage of the entire Greek Territory takes place in Athens and Thessalonica Offices.

Furthermore, EETT handled the assignment and monitoring of the Radiofrequency Rights of Use for international athletic events, the most important of which was the European Champions League.

Finally, as far as the Radio and Telecommunications Terminal Equipment (RTTE) market was concerned, EETT continued the inspections and the sample's investigation aiming at protecting the consumers from illegal apparatus and

avoiding possible harmful interferences. At the same time, it laid out a special procedure for conducting investigations.

Postal Services Sector

EETT, according to the management plan, conducted a qualitative study regarding the characteristics of the Greek and the European Postal Services markets, in collaboration with an independent agency, in order to complete the revision of the current regulatory framework for General Authorizations and Individual Licences. Special emphasis was laid on the qualitative, financial and social characteristics that a Universal Service (US) must have in a fully liberalized market. The data and the conclusions of the study along with the results of a respective Public Consultation, will be used for the implementation of the new regulatory framework in 2008.

During 2007, EETT conducted a series of information seminars in Athens, Thessalonica and Patras, aiming at informing the Postal Services market about the proper implementation of the legal framework and the special role of EETT as the National Regulatory Authority (NRA) in the Greek Postal Services sector:

EETT proceeded with its supervisory work, conducting scheduled and unscheduled investigations (autopsies) of Postal Service providers, as well as of Universal Service Provider's (USP) premises. These supervisory actions aimed at eliminating the illegal postal activity and rendering quality services to consumers.

Furthermore and regarding the measurement of the quality indicators for the provided Postal Services, EETT determined the speed and the credibility of A' Priority Domestic Mail distribution by the USP. Respectively, the quality measurements of Incoming/ Outgoing International Mail of A' Priority were carried out by the International Postal Corporation (IPC).

During 2007, EETT worked with the USP for the design and the implementation of a new cost accounting system. This particular action aimed at the adoption of a more flexible, transparent and reliable cost accounting context.

Finally, EETT proceeded with monitoring the Courier Services sector in terms of volumes, revenues, infrastructure, dispute resolution with consumers, as well as an estimation of market trends for the following three years.

European and International Collaborations

In 2007, EETT continued its multifarious activity in the field of European and international collaborations.

EETT's activities at a European level, contributed to the development in the sectors of Electronic Communications and Postal Services. EETT participated actively in the work of the European Regulators Group (ERG) and hosted in Athens the Plenary Meeting of the 25 ERG Presidents. Also, it contributed to the writing of the 13th Report of the European Commission by generating the necessary data for the Electronic Communications market in Greece. At the same time, EETT followed closely the developments in the European Postal Services market by participating in the Plenary Meetings of the Comité Européen de Réglementation Postale (CERP). Also, it continued to co-operate closely with other official European committees in all the fields of its competence.

Equally active was EETT's international presence through the conclusion of bilateral co-operations and participation in conferences and formal meetings. It participated in the Independent Regulators Group (IRG), as well as in the World Radiocommunication Conference 2007 that was held by the International Telecommunication Union (ITU). Finally, EETT took part in the 2nd Euro-Mediterranean Meeting, where it contributed to promoting co-operation among the NRA in the Mediterranean region.

Other Actions

In 2007, EETT improved its internal organization and operation. Specifically, the procedures for the recruitment of 16 new staff members, who will significantly bolster its workforce, were completed. At the same time, EETT promoted the education and training of its personnel.

Throughout the year, EETT continued its efforts to upgrade its operation and enhance its effectiveness. Towards this direction, EETT put into operation all the subsystems of its Integrated Information System (IIS), which is a project of strategic significance and is expected to upgrade the services provided by EETT. As part of this project, the reorganization of the operational procedures of the Central Registry, combined with the operational beginning of the IIS relevant application were of great importance.

Moreover, EETT continued implementing its projects that had been included in the Operation Programme of the Information Society (OPIS) of the 3rd Community Support Framework (CSF III).

Finally, EETT focused on upgrading its website services. Some of the main actions were the creation of special thematic sections on its website and a new website especially dedicated to broadband. These two websites have been under continuous update and improvement aiming at serving as useful means of communication and information.

In the following chapters, there is a detailed description by sector, of EETT's actions in 2007. The provided information corroborates the positive results that were brought about by its interventions in the markets of Electronic Communications and Postal Services, as well as the benefits for the consumers.





01 The Consumer at the Centre of Developments



In the contemporary environment of Electronic Communications and Postal Services, the provision of quality and innovative services, the protection of consumers from unfair practices, their adequate information and the establishment of a trusting relationship towards the operational rules of the markets, are certain issues that contribute to the development of the two sectors.

In 2007, EETT acted towards that direction by improving the provision context of Carrier Pre-selection, by reducing the tariffs for call termination and International Roaming and by defining the provision terms for Internet Services. Additionally, it took certain measures for the consumers' protection from illegal dialers and the securing of their rights in the Postal Services. Finally, it provided for the consumers' information regarding subjects of great interest for them.

I.I. Care for the Consumer

2007 has been the fifth consecutive year that the Consumer Service Sector (CSS) operates. The CSS evaluates all the formal complaints filed by consumers regarding issues of Electronic Communications and Postal Services. Afterwards, EETT develops the results of that process through its respective Directorates, in order to:

- Detect issues which call for its intervention.
- Proceed to regulatory and supervising actions needed for the resolution of problems and the proper operation of markets. Towards this direction, it conducts audits and Hearings of the respective operators and is

authorized to impose Recommendations, fines or administrative sanctions in cases of law infringement.

- Plan information actions for issues of great interest for the consumers.

During 2007, the CSS received 17,742 written requests/complaints from consumers regarding the Electronic Communications and Postal Services sectors, registering an increase of 213% and 262% compared to 2006 and 2005, respectively. The classification of the written requests/complaints by subject, their annual evolution and their percentage change are displayed in Table I and Figures 1 and 2.

Table I
Classification of Requests/ Complaints by Consumers, 2003 - 2007

CATEGORY	2003 (%)	2004 (%)	2005 (%)	2006 (%)	2007 (%)
ELECTRONIC COMMUNICATIONS	95	90	93	93	96
Radiofrequency Spectrum (antennas and interferences)	35	54	36	17	6
Internet (availability of services and tariffs)	29	7	11	21	10
Mobile Telephony (availability of services, quality and tariffs)	15	10	5	6	3
Fixed Telephony (availability of services, quality and tariffs)	14	18	40	48	77
Domain Names [.gr]	2	1	1	1	0
POSTAL SERVICES	3	2	1	1	1
GENERAL INFORMATION	2	8	6	6	3



Figure 1
 Classification of Written Requests/ Complaints (%)
 01-01-07 to 31-12-07

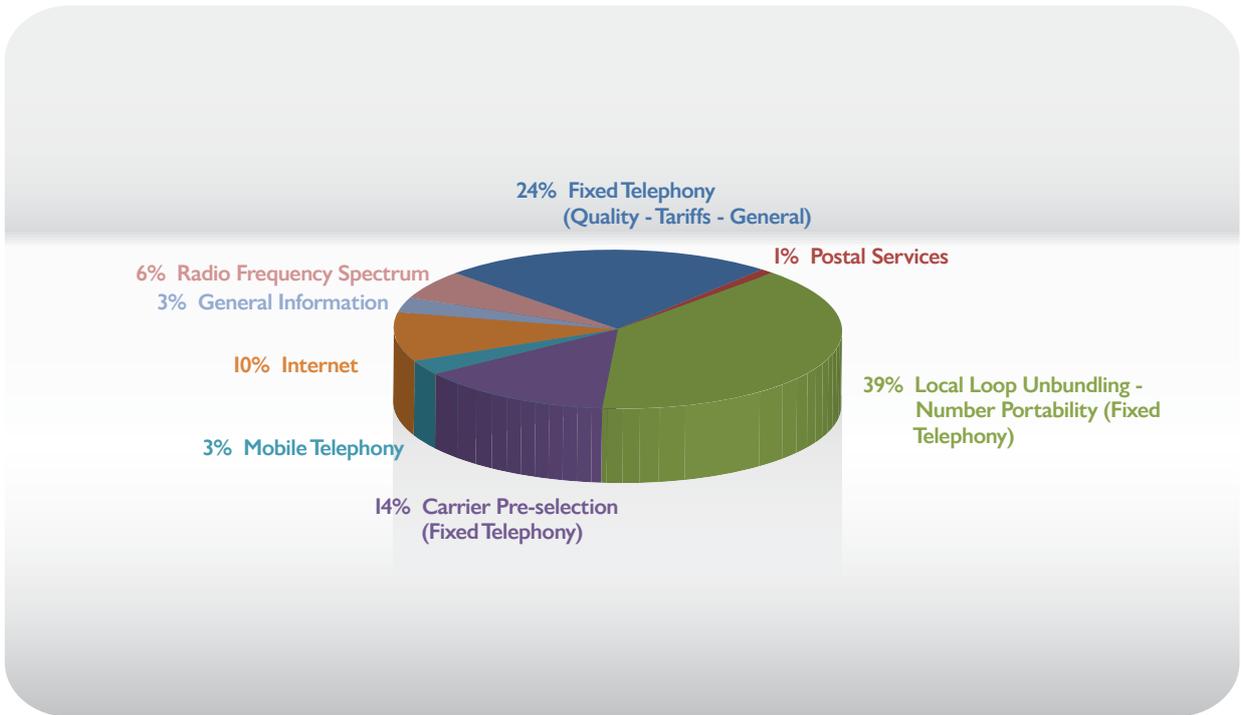


Figure 2
 Development of the Number of Calls and Written Complaints
 2004 - 2007

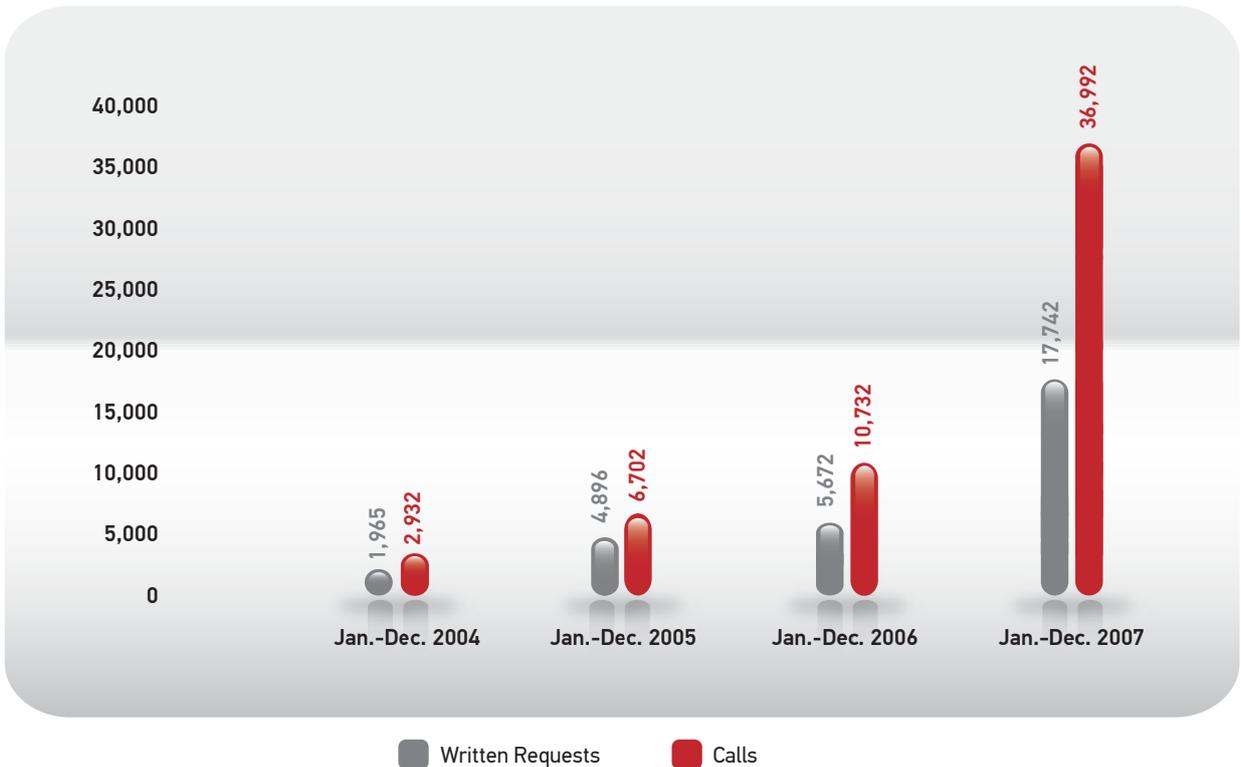
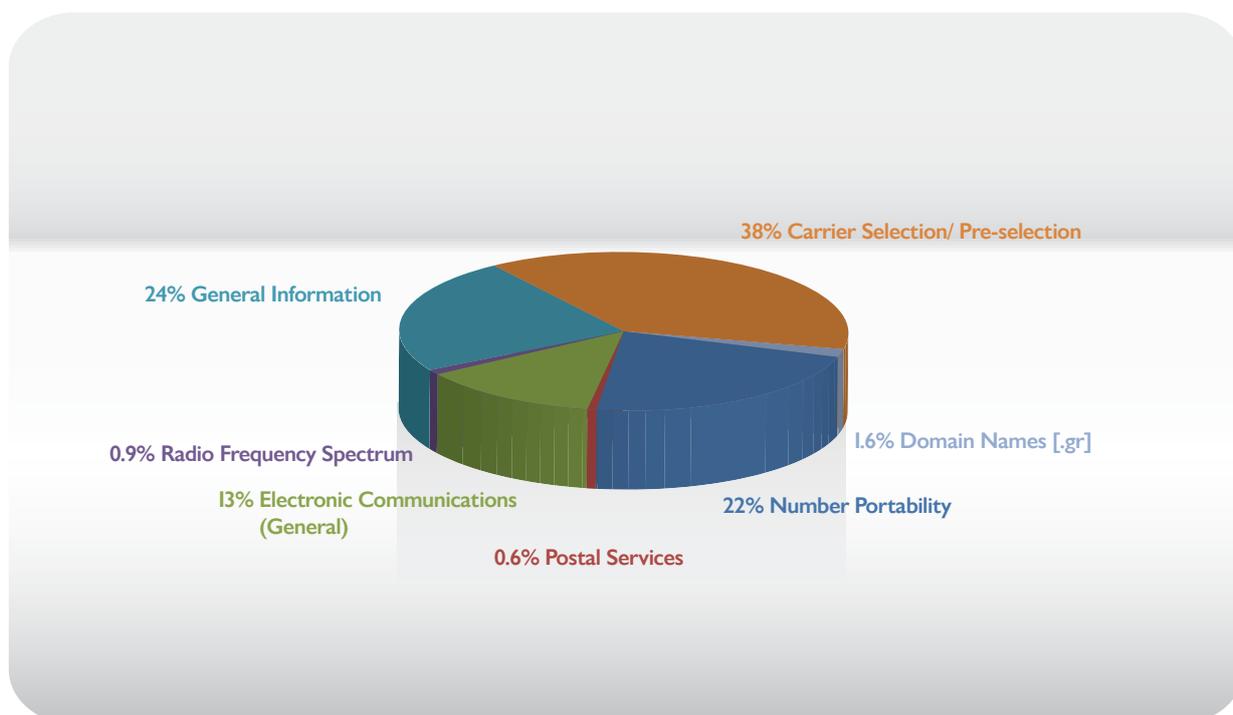


Figure 3
 Classification of Consumers' Calls (%)
 01-01-07 to 31-12-07



The majority of written requests/ complaints for mobile/ fixed telephony and general information as well, was focused on issues of Local Loop Unbundling (LLU), Fixed Number Portability, Carrier Pre-selection, quality and speed of broadband services, disputed bills, obligations of Electronic Communications operators, as well as on the quality and availability of certain services.

In the case of Radio Frequency Spectrum, the majority of issues related to the licensing of mobile telephony antennas and cases of interferences.

As far as Postal Services were concerned, requests/ complaints focused on issues regarding the quality of services and the obligations of Postal Services providers.

Moreover, the Consumers Communication Line of EETT, has received, during 2007, 36,992 phone requests/ complaints from consumers, registering an increase of 244% and 452% compared to 2006 and 2005 respectively (see Figure 2). The classification of telephone calls by subject is shown in Figure 3.

I.2. Benefits for the Consumer

I.2.1. Carrier Pre-Selection

In 2007, the operators drew up jointly the Code of Practice for the provision and operation of Carrier Pre-Selection service, which was submitted to EETT for its approval. The Code defines the rules and the procedures for the provision of the service, in order to ensure the proper market operation and the protection of consumers. It is noted that according to EETT's Decision¹, the drafting of the Code is an obligation of the operators.

EETT approved² the Code, which covers significant matters such as:

- The content of the contracts that are signed among the operators and the subscribers.
- The necessary information than must be given to the subscribers.
- The procedures of ordering and promoting the fixed telephony service via Carrier Pre-Selection.

1. EETT Decision 366/48/08-12-2005, GG Issue (22/B/17-01-2006) "Modification of the Regulation on Carrier Pre-Selection in the Greek Market".

2. EETT Decision 432/146/26-04-2007.

- The payment of bills.
- The display of the invoice schemes.
- The handling of the subscribers' complaints and the delimitation of OTE's activities regarding the win-back campaigns.
- Resellers' issues.

According to the Code of Practice, the standardized text of the provision terms for fixed telephony services via Carrier Pre-Selection inter alia must:

- Mention distinctly the ability of the subscriber to terminate the contract and define the ways of the termination.
- Determine explicitly any minimum duration of the contract, as well as disclose specifically any possible consequences from the breach of the contract.
- Report clearly the ways under which the subscribers are informed about the billings, the means of payment and the invoicing frequency.
- Provide the subscriber the ability to reject in advance unwished communication emanating from the operator or any other third party.
- Certify that the use of the subscriber's personal data is conducted according to the legislation regarding the protection of personal data in Electronic Communications and the assurance of information and communication privacy and security.
- Report a customer care number and the telephone number to obtain any information about the activation of Carrier Pre-Selection.
- Not include any advertising or promotion material or incentives (e.g. prizes).

As far as the promotion of services is concerned, the following are in effect:

- The operators must not give false information concerning:
 - ▶ Their network.
 - ▶ The potential collaborations with other networks or operators.
 - ▶ The services of other operators.
- At the demand of EETT, the operators are obligated to set at its disposal any element/ data that demonstrates the subscriber's true and clearly stated will for the provision of services and the valid contracting of the agreement.
- The presentation of advertising material and of any other included elements must be true, precise and not misleading. The operators are obligated to retain records that certify the aforementioned requirement.
- During the telephone communication with the subscribers, the operators are obligated to use a simple language and ensure that the subscribers have fully

comprehended the terms of the contract and the provided services.

- As far as the promotional activities are concerned, the operators are obligated to respect the privacy of the subscribers (e.g. resting hours, unwished communication for product promotion). They are also obligated to respect the rights and the special needs of the vulnerable social groups (such as elderly and disabled people or people that don't fully comprehend the Greek language).

The operators are obligated to publicize the Code of Practice in their website and abide by its provisions.

1.2.2. Local Loop Unbundling

The consumers via LLU are able to choose among different operators in order to enjoy innovative telephone services, broadband access to Internet and TV or video via Internet (IPTV/ Video on Demand).

For the realization of the afore-mentioned abilities, the alternative operators use the cable (**Local Loop**) that connects the subscriber's house to OTE's Local Exchange, under specific leasing agreement from OTE. LLU is the kingpin for strengthening of competition among the operators and the improvement of the provided services' quality. At the same time and taking into consideration the market growth and the resulted economies of scale, the continuous price reduction of broadband services renders them accessible to a constantly growing part of population.

The consumers, in addition to high speed Internet connections, have also access to bundled services. Indicatively, the operators offer **double-play** services (fixed telephony and always on access to Internet) and **triple-play** services (fixed telephony, always on access to Internet along with digital cable TV) in joined bills and with an ability for an unlimited number of local, national and international calls to selected destinations. Moreover, the entrance of mobile operators to the LLU market is expected to result in the presentation of **quad-play** services (fixed telephony, always on access to Internet, digital cable TV and mobile telephony).

The broadband services offered via LLU, inter alia contribute to:

- The development of e-government services that improve the level of service offered to citizens and enterprises. All concerning parties via those services are informed in advanced about their transactions and at the same time their presence is not required thanks to the developed automated procedures.

- The application of new, modern and cost efficient methods of advertising and promoting products and services via Internet (e.g. tele-commerce), a process that strengthens enterprises' competitiveness.
- The improvement and further development of agricultural production via the information gained on sophisticated subjects³ and the promotion of the agricultural products to domestic and foreign markets.
- The provision of new learning tools to each and every educational level (from the student in the primary school to the postgraduate student), since Internet is an unlimited source of knowledge, communication and entertainment (e.g. access to libraries, online Internet games).

EETT's actions for 2007 regarding LLU are described in sub-section 2.2.

1.2.3. Reduction of Mobile Termination Rates

The actions for the reduction of mobile termination rates persisted through 2007. It is reminded that, EETT's Decisions⁴ from 2006 had obliged mobile operators to reduce their termination rates in order to reflect the cost of call termination on each network. Those specific Decisions were based on the Draft Measures⁵ for the market of wholesale mobile voice call termination, which had been approved by the European Commission.

For the period December 2006 - December 2007, the average weighted reduction of termination rates, taking into consideration the relative market shares, ranged to 12%. The mobile termination rates from June 2006 till December 2007 are presented in Table 2.

It is noted that the termination rate is the wholesale charge paid to a mobile operator from another mobile operator, in order for the latter to be able to terminate its calls on the network of the former. The retail price paid by the consumer is the sum of the termination rate plus an additional rate, which is set by the mobile operator of the call originating network.

The reduction of the mobile termination rates has resulted in the reduction of the retail prices of calls made to mobile networks from fixed or other mobile networks.

1.2.4. Reduction of Fixed Termination Rates

In November of 2007, EETT's Decision⁷ set, for the period January - December 2008, the new ceiling price and the new target price for calls terminating on the networks of alternative operators (OTE is excluded) which enjoy Significant Power in the wholesale call terminating markets. The resulting reduction of the termination rates will lead to a further reduction in the retail prices for all the subscribers (OTE's or alternative operators') when they call subscribers of alternative operators.

Analytically, the alternative operators are obligated to apply:

- A termination rate for geographic numbers in their network, which will not exceed 0.01131 euros/ min. for 2008. This rate is by 18% reduced compared to that of 2007.
- A new target price which ranges to 0.00849 euros/ min. From 1st January 2009, each alternative operator is compelled to apply a termination rate that is equal or smaller than the above target price.

Table 2
Evolution of Termination Rates (eurocent/ min.)

Period	VODAFONE	COSMOTE	TIM ⁶	Q-TELECOM
June - December 2006	12.00	12.00	12.50	17.00
January – May 2007	11.74	11.74		12.59
June - December 2007	10.67	10.71		11.71

Note: A minimum duration of 30 seconds was included in termination rates up till December 2006.

3. Subjects of cultivating and producing durable and adaptive seeds, weather conditions, financing and subsidies.

4. EETT Decisions 392/17/22-06-2006 and 410/37/15-II-2006.

5. http://www.eett.gr/opencms/sites/EETT/Electronic_Communications/Telecoms/MarketAnalysis/Agora16.html

6. In January 2006, TIM merged with Q-TELECOM and in June 2007 was renamed to WIND Hellas.

7. EETT Decision 459/135/14-II-2007.

It is noted that the 2006 average Price Consumer Index of the National Statistical Service of Greece (NSSG) was taken into consideration in order to calculate the aforementioned prices.

This particular Decision of EETT aimed at achieving a gradual reduction of termination rates (glide path period), regarding the wholesale call termination market⁸. Under this scope, EETT will regularly examine the termination rates in order to ensure their gradual adjustment and to prevent possible deviations from the scheduled glide path period.

1.2.5. Reduction of International Roaming Rates

The European Regulation on International Roaming⁹ that was put into force in the 30th of June 2007, guarantees reasonable International Roaming call rates for all European citizens that travel across the countries of the European Union (EU) and at the same time, compels all mobile operators to inform their subscribers about the relative tariffs. It is noted that this particular Regulation does not impose obligations on the rates of International Roaming Short Message Services (SMS), Multimedia Messaging Services (MMS) or other data communication services.

According to the Regulation, the mobile operators are obligated to offer their subscribers the "Eurotariff", which is the maximum charge for making and receiving roaming calls within the EU. For example, a subscriber traveling from Greece to another member state of the EU, is charged up to 0.49 euros/ min. (plus VAT) for call making and up to 0.24 euros/ min. (plus VAT) for call receiving.

Moreover, the mobile operators are obligated to inform their subscribers by means of a SMS about the International Roaming charges when they enter a member state other than that of their home network. This information entails:

- The International Roaming charges that apply to the making and receiving of calls.
- The **free-of-charge number** that the subscribers can call and obtain additional information about International Roaming charges (SMS, MMS and other data communication services included).

Apart from the charges set out by the European Regulation, the mobile operators are able to offer specific International Roaming packages. In that case, the subscribers are in position to choose between those roaming packages and the existing Regulation tariffs according to their use of the International Roaming services.

Additionally, the Regulation imposes to all mobile operators a maximum average charge at wholesale level, so that the mobile operators will be able to offer the decreased retail International Roaming charges.

EETT is responsible to monitor, supervise and ensure the compliance of the domestic mobile operators with their obligations according to the specific Regulation. At the same time, it keeps track of the progress of the wholesale and retail prices to International Roaming customers regarding voice and data communication services.

Furthermore and in collaboration with the **European Regulators Group (ERG)**, EETT gathers data and contributes to the drafting of Directives regarding the International Roaming Regulation and of reports about the compliance degree of mobile operators with their obligations. Additionally, a specific section about International Roaming was created in EETT's website along with the issue of a related information leaflet (see sub-section 1.2.9).

All the above actions ensure the proper application of the Regulation with direct benefits for the subscribers and support the European Commission's work for the protection of the European citizens' interests.

1.2.6. Amendment of General Licences Regulation

In the aftermath of a related Public Consultation (2 May - 4 June 2007), EETT decided¹⁰ to amend the General Licences Regulation, setting additional obligations for the operators of Internet, VoIP, voice telephony and broadband services.

Specifically, the most important amendments were on the following subjects:

- I. The following abilities are offered to all e-mail users who change Internet Service Providers (ISPs):
 - Their e-mails are forwarded to their new e-mail address for a period of 2 months.
 - The addressers of their e-mails are notified by means of e-mail of the receiver's new e-mail address for a period of 6 months.

It is noted that an e-mail address cannot be assigned by an ISP to a new user before the lapse of a 6 month period from the time that it was cancelled. The above restriction does not hold for the previous holder of that specific e-mail address.

8. EETT Decision 406/34/II-10-2006 "Definition of the wholesale Interconnection Markets from Public Fixed Networks, determination of companies with significant power in those markets and their obligations", GG Issue 1669/B/14-II-2006.

9. The International Roaming service provides the users with the capability of using their mobile phones when they are abroad.

10. EETT Decision 442/68/28-06-2007, GG Issue 1279/B/25-07-2007.

2. The operators are bound by certain obligations regarding the service and the information of voice telephony and broadband services, since they ought to:
- Plan certain procedures for examining subscribers' complaints.
 - Display in an obvious and easily accessible place in their website, their postal address, the phone and fax numbers or/ and their e-mail address for filing complaints. Also, in the case of a telephone service line, information about the charge, provided that such one exists (e.g. unit charge), the charge's per minute reduction and the customer care hours must be available. Respond in writing within 20 days to each written complain/ charge filed by subscribers.
 - Serve the subscribers, inter alia, in cases of malfunctions via specific and free-of-charge telephone number that operates at least 12 hours per day from Monday to Saturday.
 - Present in an obvious place in their website and within the first 20 days of each quarter; the following quantitative data regarding their performance of their telephone customer care during the previous quarter:
 - ▶ Percentage of unanswered calls on the total number of telephone calls for each telephone customer care line.
 - ▶ Average waiting time (the time until the calls in the telephone customer care line are answered by the operator).
 - ▶ Percentage of answered calls that had a double, than the average, waiting time.

3. The operators are obligated to inform the subscribers for possible service interruption. Specifically:

- They ought to notify their subscribers 20 working days in advance about a scheduled business stoppage.
- They ought to notify their subscribers the next working day, than the day they were informed, about an unscheduled stoppage.

Finally, this particular Decision of EETT regulates subjects regarding the provision of VoIP services, such as the context of contracts, invoicing subjects (see sub-section 3.3.5.).

1.2.7. Consumers' Protection Measures from Dialers

From the beginning of 2006, EETT received a large number of complaints filed by Internet users, concerning their excessive charge for calls made to premium rate numbers (series 90X XXX XXXX) or to international numbers, which were made unknowingly and without their consent. These particular calls related to their Internet access and were executed via dialer programs.

The dialers are programs that are installed to the user's computer and make a call to a premium rate number; in order for the user to gain access to a specific content (e.g. games, adult content, SMS, logos). The fraud via dialers is possible during the user's access to websites which are not secure and do not inform him/ her that his/ her actions will lead to the installation of software in his/ her computer or that his/ her Internet connection will change to a more frequent or permanent basis. Such dialers are installed to the user's computer without his/ her consent and make calls to premium rate numbers, at the user's cost, 24 hours a day, even every few minutes, provided that the computer is on.

From 2006, EETT had already proceeded to important actions for the consumers' protection, which included, inter alia, Hearings of the operators that were assigned those specific premium rate numbers, Instant Measures Procedures, as well as Orders for the suspension of those numbers' operation until the issue of Decisions with regard to the Instant Measures Procedure.

During 2007, EETT continued to examine closely this specific topic. In July, it decided¹¹ that the aforementioned operators infringed upon the Electronic Communications legislation and the anticipated fines were imposed on them. At the same time, it addressed recommendations to all operators not to collect on the charges of these specific calls, for which complaints were filed to OTE.

Moreover, EETT, following the complaints regarding unintentional calls to international numbers and the respective cases' investigation, took Instant Measures estimating the risk factor for the users from dialers in international numbers. Within this framework, the operators of public telephone services were obligated to temporarily bar the direct calls made to a specific list of international destinations¹², which is filled in or amended by EETT according to the collected data. The traffic towards the above international destinations is completed via an operator from the Universal Service Provider (USP), which is OTE.

At the same time, the ISPs were asked to provide for the systematic and close information of all Internet users by means of e-mails. This information entailed on the one hand all existing Internet risks from dialers, to international destinations, as well as to premium rate numbers, and on the other hand methods of protection with specific suggestions of material and software.

11. EETT Decision 447/17/26-07-2007 and 447/18/26-07-2007.

12. This specific list includes the following international destinations: Nauru (00674), Solomon Islands (00677), Wallis and Futuna (00681), Kiribati (00686), Guinea Bissau (00245).



Finally, EETT drew up and published in October of 2007 the Code of Practice for the **Multimedia Information Services (MIS)**¹³, which inter alia regulates dialer related issues and establishes operation rules which guarantee the users' protection. The regulated subjects under the Code are presented thoroughly in the following sub-section.

It is pointed out that this specific Code relates to the MIS offered via numbers of the National Numering Plan (NNP) and consequently, does not regard the dialer services via international numbers, which EETT does not have the competence to manage or check.

1.2.8. Code of Practice for the Multimedia Information Services

In October of 2007, EETT published the Code of Practice for the MIS, which establishes the rules for the provision of:

- Audiotext services.
- Videotext services.
- Premium Short Message Service (PSMS).
- Premium Multimedia Messaging Service (PMMS).

The MIS can be provided via Internet and it is noted that this specific Code does not relate to the regulation of the content of those specific services.

In Greece the MIS are provided via the ten-digit numbers of the 901 XXX XXXX, 909 XXX XXXX patterns and the five-digit short codes 14XXX, 190XX - 195XX and 54 XXX, which should be clearly displayed to any advertising material of the MIS operators. According to the Code of Practice, the operators of MIS inter alia are obligated to:

- Set up a local charge customer care line, that should be displayed to each MIS communication/ advertising. The service from the customer care line should not be limited to a recorded message.
- Include to every promotional material a complete and explicit description of the charge along with their identity and communication data, in order for the users to be capable of direct communication with them.
- Publish a table with the provided MIS, which should be easily accessible from the consumers. This table will be displayed to the MIS operator's website or alternatively will be hosted to the tables of respective network operators.
- Provide an explicit description of the charge at the beginning of the call via a recorded message and free-of-charge.

- Inform directly, in cases of PSMS –either after the first message or the user's registration message- about the price per message and the total number of messages required for the provision of the service.
- Not to place the user in an excessive and unjustifiable waiting for his/ her connection to the service. In every case, the user is not charged for the waiting period and is informed in advance about that. If that is not technically feasible and there is no available line for the provision of the service, the operators do not answer any consumer's call.
- Inform the user at the beginning of his/ her connection that the service is provided under the licence of the person that pays the connection to the Electronic Communications network. Also and in the cases of adult services, the operators should inform at the beginning of the connection, that only adults (people over 18 years old) can use this service.
- Disconnect automatically the user's connection after the lapse of a 20 minutes period from its beginning.

This specific Code of Practice regulates also subjects on the protection of users from illegal dialers. Specifically, the following are in effect inter alia for the provision of MIS via Internet:

- From the very beginning, the MIS operators via Internet inform the user about the connection to a premium rate service and the relative cost. The relative information data is displayed discretely and clearly in a "window", which is not impeded by other "windows", graphics or text. In that "window", the user states his/ her explicit consent for the connection to the service by pressing an OK button.
- The MIS operators are obligated to ensure that the dialing and modem sounds are always activated.
- In the case of a MIS charged per time unit, the operators are obligated to place in a permanent base a digital time counter at the application window that enables the access to the service, which will display the connection duration.
- The operators are obligated to disconnect automatically the user's connection after the lapse of a 20 minutes period from its beginning.
- The software that enables the user's connection to the service is not allowed to replace permanently the computer's Internet connection number with the premium rate service number or to activate the connection to the service without the intervention or the explicit consent of the user.

13. GG Issue I943/01-10-2007.

I.2.9. Quality Indicators of the Provided Electronic Communications Services

During the period 22 October – 21 December 2007, EETT conducted a Public Consultation on the quality indicators of the Electronic Communications services. This Consultation is part of EETT's actions for the determination of comparable, sufficient and handy information regarding the quality of the services offered to the users. It is noted that, the operators of public networks or/ and services of Electronic Communications are obligated to publish those information, after EETT's recommendation.

The Consultation was conducted according to the current legislative and regulatory framework, the international standards and the international experience on that sector. The main sources were the standards and the specifications of the European Telecommunications Standards Institute (ETSI) and of the International Telecommunication Union (ITU).

The Consultation's paper presented the suggested by EETT quality indicators for fixed telephony, mobile telephony and fixed broadband services. Specifically, the Consultation for each quality indicator focused on its description, its suggested measurements, the general measuring procedures described in the international standards/ recommendations and its application on direct or indirect services¹⁴, according to each kind of service operator.

Additionally, it was suggested that the operator, that charges the user, should also be responsible for the quality of the service and the provision of statistical measurements. For example, in the case of [Carrier Selection/ Pre-Selection](#), the operator, that is selected/ pre-selected to carry out a call, should also be responsible for the quality of the service and the provision of the relevant statistical data.

The majority of the participants agreed with EETT' suggestions and the views that were expressed focused on the need for ensuring a total of indicators which will be comprehensible by the average consumer.

EETT will utilize the results of the Consultation in order to issue in 2008 a relative Regulation which will determine¹⁵:

- I. The quality indicators that the operators are obligated to measure.

2. The content and the form of the information, that is about to be published, in order to ensure the consumers' access to complete, comparable and functional information.
3. The way and the time of the publication of the information.
4. The operators' obligation to submit to EETT a copy of the information before its publication.

I.2.10. Protection Measures for the Postal Services Users

In 2007, EETT, in the aftermath of respective complaints filed by Postal Services users, conducted investigations (autopsies) in rural settlements of Attica which are excluded from the daily distribution and the door to door delivery from the Hellenic Post (ELTA) and the distribution is conducted via letter boxes. By performing on sights investigations, EETT realized the degree of difficulty for obtaining access to the public network, investigated the absence of road signs and numbers and clarified the categorization of that specific areas, regarding the demographic concentration and the standards of the road network.

Additionally, EETT conducted audits on ELTA's post offices in the Attica District in order to find out if a specific list of the areas excluded from the daily distribution and the door to door delivery was displayed, as well as their service frequency¹⁶. It reached the conclusion that ELTA informed the consumers only in cases that a relative request was made by them. Taking into consideration all the above, EETT recommended to ELTA to display those lists in obvious places.

Another finding of the audits was that ELTA hadn't displayed the pricelist of its services in its post offices. It is noted that, according to ELTA's obligations as [Universal Service Provider \(USP\)](#) in the Postal Services market and the respective [Chart of Obligations to Consumer \(COC\)](#), the above pricelist should be suspended in an obvious and easily accessible by the consumers place in all of its post offices. Following EETT's relative note, ELTA informed all of its Regional Districts about the display obligation of the pricelist in every post office.

14. Direct is the service for which the operator provides also the access network. Indirect is the service for which the operator does not have the access network but has been chosen from the user via [Carrier Selection/ Pre-Selection](#).

15. The above obligations that EETT is able to impose regard only the operators of public network or services of Electronic Communications and are active in the relevant markets for at least 6 months.

16. According to MD 28977/811/21-06-2006.

EETT will utilize the findings of the investigations (autopsies) and the on-sight audits in order to reform the current legislative framework for the benefit of consumers.

Finally, as far as the providers of Courier Services were concerned, EETT examined their individual terms of service (contracts) and concluded that the minimum reimbursement amount for loss or destruction of postal items, as well as the time of the claim were not reported in the majority of the cases. EETT, trying to safeguard the consumers' interests, addressed the respective recommendations to the Postal Services providers in order to proceed to the necessary modifications.

1.2.II. Information Actions

Information Campaign on the Mobile Telephony Antennas

On the 30th of January 2007, EETT organized a workshop in Thessalonica on "Mobile Telephony Antennas: Responsible Dialogue for the Valid Information and the Protection of the Consumers".

The Agenda of the Workshop included the following topics:

- Wireless Communications: Electromagnetic Field and Scientific Data.
- The Citizen in the New Environment of Wireless Communications: Regulatory Framework – Information and Protection Methods – Future Proposals.

All scientific data regarding the complex subject of the mobile telephony antennas were presented in the workshop. Also a fruitful dialogue took place between the official authorities which resulted in useful conclusions regarding the secure operation of the mobile telephony networks. Additionally, the participants were also informed about subjects of rational and secure use of the mobile telephony.

In the workshop participated representatives of the academic community and official agencies, Local Government institutions, market executives and consumers' representatives.

Workshop on "Electronic Communications Service Quality and Consumers' Protection"

On the 11th of December 2007, EETT organized a workshop on "Electronic Communications Service Quality and Consumers' Protection".

The workshop emphasized the key role that the public supervising authorities, the operators, the consumers' groups and the Citizens' Union play in ensuring the quality of the provided Electronic Communications services. At the same time, a constructive dialogue took place between all parties involved regarding the improving capabilities of the consumers' service level, as well as means of ensuring their rights.

The head speaker of the workshop was the Minister of Transport and Communications, Mr. Kostas Hatzidakis. Representatives of political parties and of broader public sector, market executives, as well as representatives of the academic community and of consumers, participated in the event.

International Roaming Guide



Aiming at the adequate consumers' information on Electronic Communications subjects, EETT issued an informative guide about International Roaming which informs consumers about the ways that they can use International Roaming when they travel abroad.

Specifically, it informs, inter alia, about the following topics:

- Activation of International Roaming.
- The provided potentials of the service and the respective charges.
- The provided choices.
- The obligations of the operators according to the new EU Regulation on Roaming that was entered into force at the end of June 2007. This specific Regulation sets as a primary goal the reduction and the transparency of International Roaming charges.

Information Campaign on Postal Services

During 2007, EETT conducted a series of information seminars in Athens, Thessalonica and Patras aiming at informing on the one hand the consumers about their rights and on the other hand the Postal Services market about the proper implementation of the legal framework. At the same time, EETT presented the results of its supervi-

sory work and the participants had the opportunity to exchange views about the market developments (see also sub-section 5.1.3.).

Consumers groups from North and West Greece, as well as from Athens, representatives of Postal Services providers, chambers, public financial services and other institutions took part in the events.





02 Broadband Year: Broadband Promotion Actions

The nomination of 2007 as Broadband Year by the Greek Prime Minister, Mr. Konstantinos Karamanlis exhibits fully the significance that is rendered to broadband growth by the Greek state.

From the regulatory side, the enactment of Law 3431/2006 provided EETT with the necessary tools for the substantial unbundling of Local Loop. This fact resulted in the strengthening of competition and the increase in the investments made by the alternative operators in order to provide innovative services.

At the same time, EETT proceeded to certain broadband information campaigns, in order to ensure that the consumers march along with the market developments and utilize the resulting benefits.

2.1. The Broadband Progress in Greece

2007 was a landmark year for the broadband progress in Greece. The broadband connections exceeded 1,000,000 at the end of the year (population penetration rate 9.1%). At the same time **Local Loop Unbundling (LLU)** demonstrated a rapid growth.

According to the data of the 13th Annual Report of the European Commission on the progress of the European Electronic Communications market, Greece for the first time entered into a convergence orbit with the European Union (EU), since its annual broadband growth rate (annual increase of the broadband lines per inhabitant) was bigger than the average European one. Specifically, the broadband growth rate in Greece for 2007 ranged to 4.7 lines per 100 residents compared to the European 3.8 lines per 100 residents. The result of this growth for 2007 was that Greece no longer occupied the last position of the EU classification regarding the broadband penetration.

The rapid increase of the LLU lines was a catalytic factor for the broadband growth, since at the end of the year it constituted 20% of the total broadband lines and respectively, over the 5% of the main telephone connections of the country.

The LLU growth is directly connected to the Physical Collocations that were carried out in Greece during 2007. Specifically, at the end of the year a **Physical Collocation** was provided to 70 OTE's Local Exchanges in Attica and in 49 in the rest of Greece. The increase of the physically collocated areas provided the alternative operators with the

capacity to access a percentage larger than 60% of the country's total subscribers.

It is noted that, the basic mean for broadband access still remains the xDSL access via **ARYS** lines¹⁷. However, the increase rate of that specific access declines constantly in relation to the respective rate of access via LLU that increases. This progress shows on the one hand that the alternative operators climb up the ladder of investment and on the other hand the consumers' interest for innovative products of Electronic Communications.

2.2. Regulatory Interventions of EETT

Issue and Amendment of the Reference Unbundling Offer

EETT approved¹⁸, after certain amendments, OTE's **Reference Unbundling Offer (RUO)**. The obligation for the submission of this specific Offer was imposed to OTE by a former EETT's Decision¹⁹, due to the lack of competition that existed in the wholesale LLU market.

The new Reference Offer defines the prerequisites and the procedures according to which OTE provides the necessary services and access conveniences to the operators (primarily the collocation rights to its Local Exchanges), in order for the latter to be able to provide competitive LLU services to the consumers. It is noted that OTE's RUO does not regulate the conventional retail relationships among the operators and the subscribers.

17. ARYS is the Greek definition for ADSL and is about the broadband technology that uses the existing telephone lines' copper cables in order to succeed in achieving higher data transmission speed (along with the simultaneous voice transmission).

18. EETT Decision 429/15/04-04-2007, GG Issue 620/B/25-04-2007.

19. EETT Decision 388/012/31-05-2006, GG Issue 932/B/2006/18-07-2006.

Specifically, the RUO inter alia provides for:

- The transition procedures among services (e.g. Loop delivery via Portability, change of LLU operator). These procedures target the minimization of the period during which the consumer does not enjoy telephone or/ and broadband services.
- The economic terms related to the LLU services, since the subjects that are regulated entail the rights and the obligations of each party involved, the allocation way of the available resources, as well as the cost allocation among the operators.
- The terms of the Service Level Agreement (SLA): The time that OTE is obligated to deliver each Local Loop is significantly decreased and at the same time specific clauses were set in the case that OTE does not fulfill its expected obligations. Additionally, particular emphasis was laid upon the subject of damage notification and restitution, setting specific obligations, as far as the restitution time is concerned and providing for specific clauses, in cases that OTE fails to comply with the aforementioned obligations.

For all the above matters, the consumer needs only to address the operator from which he/ she wishes to buy services and will be responsible to proceed to all necessary actions for the satisfaction of his/ her demands.

The new RUO has set the base for the development of a viable, effective and pure competition in the Electronic Communications market, facilitating the entrance and the activation of operators to that market on equal terms with OTE for the benefit of the consumers.

EETT, having monitored the application progress of the RUO, decided that the amendment of specific provisions²⁰ was necessary in order to primarily clarify issues for the allocation of resources related to Collocation. Consequently, it proceeded in December 2007 to the completion of the above Offer via an Instant Measures Decision²¹. Specifically, the so-called “imaginary number”, which represents the “identity of the wire” that reaches consumers’ premises, is imported temporarily. Also, additional procedures and information are planned for quicker damage restitution. The consumer is benefited from the additional interventions of EETT, due to the effective damage control on the one hand and the simplification of the procedure for changing LLU operator on the other hand. This simplification is achieved because the loop’s “imaginary number” is inscribed on the bills that the consumer receives and thus the latter can use this number at his/ her convenience in every request for changing service or/ and operator that he/ she makes.

Also, in the aftermath of relative requests made by OTE and the rest of the operators, EETT conducted a Public Consultation²² for the period 21 December 2007 – 21 January 2008 aiming at investigating the need for an extensive amendment of the RUO, regarding the following topics:

- Clarification of the existing capability of installing a cabinet in the yard of OTE’s building.
- Amendment of the procedures for the provision of Collocation, giving the operators more freedom, as far as the kind of Collocation is concerned.
- Change of the allocation algorithm for the pairs of Internal Connecting Wire.
- Clarification of the existing capability of self-providing connection and transmission services (backhauling), via the operators’ wireless means.
- Extension of the timetable for the delivery of inactive loops.

Reference Broadband Offer (RBO)

In 2007, EETT approved²³ OTE’s Reference Offer for the Wholesale Broadband Provision. It is noted that the publication of the RBO from OTE is within its regulatory obligations, in the context of this market analysis made by EETT²⁴.

EETT amended significantly OTE’s RBO aiming at meeting the contemporary needs of Electronic Communications market to the benefit of consumers and competition.

Via the RBO, certain specific procedures and timetables are defined, upon which OTE provides wholesale broadband services to other operators. In this way, the latter are able to provide to the consumers services, which are proportional to the retail services that OTE provides to its subscribers. Additionally, certain quality indicators are provided for via which the equivalent treatment as well as the transparency of the procedures and the terms of service provision, are ensured.

Furthermore, the consumer’s transition procedures among operators of ADSL broadband access are regulated and the payment of clauses from OTE to the operators in question, in cases that the former does not comply with the respective timetables, is also foreseen. At the same time, the technical and economic terms related to the provision of broadband services are defined (e.g. invoicing-payment procedures, resolution of disputes over economic issues).

20. EETT Decision 443/28/09-07-2007.

21. EETT Decision 462/174/14-12-2007.

22. EETT Decision 462/173/14-12-2007.

23. EETT Decision 437/01/01-06-2007, GG Issue I013/B/21-06-2007.

24. EETT Decision 389/51/2006.

One of the most important topics of the new RBO is the reduction of the compulsory contract time among OTE and the operators from 1 year to 1 month. This fact has direct benefits for the broadband connections market since the contract duration for ADSL services among the operators and the consumers is minimized. Consequently, consumers are expected to gain a higher freedom of choice since they will be able to change services or/ and operator of ADSL services more easily and frequently.

Finally, this specific RBO is expected to create an environment favorable to investments on behalf of market participants, a fact that will lead to the increase of competition, the maximization of consumer's benefits and the further penetration of broadband in Greece.

Retail Minus Methodology for the Calculation of OTE's Wholesale Broadband Access Prices (ADSL Services)

In August of 2007, EETT approved²⁵ the methodology of Discounted Cash Flows (DCF) for the calculation of a retail minus model for the price control of OTE's wholesale broadband access. This methodology defines inter alia the minimum margin that must exist between the retail and the wholesale price for the provision of broadband access (ADSL accesses). Additionally, EETT, by using the DCF model, set the margin in question at 20.58%.

EETT will assess the revising need of the retail minus coefficient on an annual basis, as well as in the cases that OTE intends to:

- Introduce new retail prices for broadband access or/ and offers of bundled services which include broadband access or/ and
- Proceed to changes in the Integrated Central ADSL Connection Services (OKSYA) or/ and
- Withdraw or modify the existing pattern of volume discount for the ARYS commercial product.

This Decision concludes a series of EETT regulatory Decisions on wholesale broadband access, which regarded inter alia the definition of the wholesale broadband access services and the imposition of regulatory obligations to all operators that have Significant Power to this specific market (the price control based on the retail minus model is among those).

Collocation

EETT decided²⁶, to place the draft for the Collocation Regulation under Public Consultation for the period 3 December 2007 – 21 January 2008. With this draft, EETT defines the terms, the conditions and the procedures for the Collocation of Electronic Communications equipment or/ and the joint use of relevant conveniences from the operators of services or/ and networks of Electronic Communications to:

1. Buildings: Collocation within the building (Physical in a separated area, **Co-Mingling**) or in the yard area.
2. Chambers and cabinets of electronic equipments.
3. Pipes, ducts and manholes.
4. Antennas construction.

The above infrastructure can be placed to privately-owned or not buildings, communal areas, local authority areas, public or private areas.

The resulting benefits for the public and the operators from the Regulation are the minimization of the burden caused either to environment or to public by the infrastructure works, the access possibility to services that is enjoyed by more operators, time saving and the decrease of the expenditure required for the infrastructures' development.

Rights of Way

During the period 12 December 2006 - 31 January 2007, EETT conducted a Public Consultation in order to register the opinions of all relative institutions²⁷ regarding its Decision for a uniform way of granting Rights of Way and the calculation of the relevant fees.

Afterwards, EETT assessed the results of the Consultation²⁸ and on the 1st of June 2007 carried out and submitted to the Ministry of Transport and Communications (MTC) a Proposal for the issuing of a Joint Ministerial Decision (JMD). This JMD will determine the context and the special procedures for granting Rights of Way, Installation and Operation of Electronic Communications network in publicly or privately owned areas.

25. EETT Decision 448/206/21-08-2007.

26. EETT Decision 461/52/30-II-2007.

27. Among the Consultation's participants were indicatively more than 30 Municipalities, Districts and Prefectures, the Central Union of Municipalities and Communities (KEDKE), the respective Services of the Hellenic Ministry for the Environment, Physical Planning and Public Works, the Hellenic Ministry of Interior, Public Administration and Decentralization, the Hellenic Ministry of Mercantile Marine, the Aegean and Island Policy, the Hellenic Coast Guard, all the Electronic Communications operators, the Greek Licensed Telecommunication Providers Association (SATPE), the Public Power Corporation (DEH), the Public Gas Corporation (DEPA), ILPAP, TRAM SA etc.

28. <http://www.eett.gr/opencms/sites/EETT/RightsOfWay/index.html>

The Proposal determines the following:

- The Authorities that are responsible for granting Rights of Way country-wide, with the Districts, the Prefectures and the Municipalities being the most important ones.
- The uniform procedure for granting Rights of Way for all responsible authorities (Municipalities - Prefectures - District - Public Services).
- The necessary supporting documents that must be deposited by all applicant operators along with the application for granting Rights of Way.
- The deadlines within which the responsible Authorities are obligated to answer.
- The obligations, the guarantees and the rights of the responsible Authorities on the one hand and of the licensed operators on the other hand regarding the Location/ Collocation of the conveniences, the restoration of the road network and the delivery of the final drafts of Electronic Communications networks.

At the same time, EETT determined the specifications of a special information system for the electronic management of the Rights of Way and the impression of the licensed networks. Under this system the damages can be avoided and the expansion of networks on the one hand and the consumers' connection on the other hand can be facilitated.

Following the issue of the JMD, EETT is going to issue a relative Regulation on the Way and Use Fees, according to law.

The ultimate goal still remains the facilitation of all the parties involved in the installation of modern infrastructure (optical fiber networks) across the Greek Territory, as well as the materialization of the necessary investments so the consumer will enjoy better, modern and more competitive broadband services.

Greek Region

During 2007 the actions of EETT for the broadband growth of the Greek region focused on the following:

- Setting up a special Team for the co-ordination of all the parties involved in the broadband growth in the Greek region.
- Participating in joint meetings along with the MTC, the Information Society and the operators for facilitating the installation of the necessary infrastructure in the Greek region.
- Proposing a Regulation to the MTC for granting Rights of Way for optical fiber networks.

- Issuing an explanatory circular for LLU and conducting a Consultation for the necessary amendments targeting the faster growth of infrastructure and provisions in the Greek region.

It is reminded that at the end of 2007 there was Physical Collocation to 119 Local Exchanges (compared to 71 at the end of 2006), more than 60 of which were located outside Attica. At the same time, OTE had delivered more than 790,000 pair of cables to the rest of the operators, 38% of which was located to Local Exchanges in the Greek region.

The broadband growth in the Greek region during 2007 is displayed in Map I. The red circle corresponds to the installation of broadband provisions.

2.3. Next Generation Access Networks

The continuous increase of the demand for Electronic Communication services, as well as the need for a constant service upgrading will inevitably lead to new technological developments. Pretty soon the existing operators' networks will have to be restructured to Next Generation Networks (NGN).

Specifically, the Next Generation Access (NGA) network, which is the NGN's part that is closer to the consumer, is characterized by packet transmission technologies from the consumer premises to the aggregation exchange. This node concentrates and serves multiple types of services and applications. It is noted that the NGA can be materialized via different physical means, such as optical fiber; copper cable (via xDSL), coaxial cable. Particularly, in the cases of copper cables, their partial or/ and complete replacement from optical fiber infrastructure is considered to be inevitable. The optical fiber technologies are regarded as the most optimal, since they ensure increased capacity and communication quality for the consumer.

The European Regulators Group (ERG), responding to the important changes brought by NGA and NGN in the Electronic Communications, issued in 2007 a paper which describes its positions on the NGA's growth and the resulting regulatory issues. Specifically, it mentions the wired NGA and the development of two scenarios: Fiber To The Home (FTTH) and Fiber To The Cabinet (FTTC). The paper ponders on the degree that the NGA are taken into account in the market analysis process, as well as the regime of the ex ante regulation, especially with regard to the two aforementioned scenarios. Also, the paper in-

Map I
Broadband Growth



cludes general proposals on the adaptability degree of the new Regulatory Framework, so that the latter can respond to the challenges arising from the various growth scenarios of optical fibers.

The above paper was placed under Public Consultation, which asked the opinions of the participants on subjects such as the accuracy of the two alternative evolutions, the prime enterprising and financial conclusions, the resulting regulatory issues. The results will be taken into consideration in order for the ERG group to adopt a Common Position.

It is noted that, the operators and the equipment firms were asked to communicate their answers to EETT, in case that they had participated in the Consultation, in order to set off a public discussion in Greece over the NGA issues.

2.4. Information Actions

Broadband Forum

The Broadband Forum is EETT's initiative and aims at investigating all the parameters that are necessary for the broadband growth in Greece. The central idea of this

action was the perception that the broadband growth is multi-dimensional and demands the contribution of all the parties involved.

Towards that direction, State and Local Government's Agencies, market and business representatives (including the broadband operators), members of the scientific community and social institutions, were invited to the Forum. The representatives of the institutions that responded to EETT's invitation were co-ordinated to 5 Project Teams and each of them was asked to express its position on a specific subject:

- Digital Content and applications.
- Education and training.
- Fighting the digital gap.
- Entrepreneurship, competition and viability.
- Policies for broadband growth.

During the second semester of 2007, these particular teams assembled in regular meetings, where the broadband issues were discussed and the opinions and proposals of the participants were recorded. The completion of the Forum's work is expected to take place in 2008 with the elaboration and the publication of 5 working papers, which will present the views of each Project Team.

Broadband Website

EETT, in the context of its information actions, created in May 2007 a website related exclusively to broadband (www.broadband.gr). This website provides spherical information to the public regarding broadband and relative links.

Specifically, it includes topics such as:

- Global and Greek timeliness of broadband.
- Relative researches and reports in Greece.
- Developments in the regulatory framework regarding broadband services provision in Greece and abroad.
- Topics of information or Electronic Communications' relative technologies.
- Instructions for the purchase of broadband connection.
- The benefits and the importance of broadband. Mentioning the cases of effective broadband utilization from enterprises, organizations, institutions etc.
- Answers to frequently asked questions.

During the year, the above sections were constantly enriched in order to meet the web visitors' needs.

In December 2007, EETT proceeded to a further upgrade of this site's presentation, structure and usefulness and improved the organization and the interconnection between the different sections.



Image 1: Broadband Website

EETT's International Conference on "The Global Dynamics of the Broadband Internet"

EETT organized a three day International Conference on "The Global Dynamics of the Broadband Internet" (1 - 3 June of 2007). The Conference analyzed the international

dimension of broadband Internet and additionally, Greek and foreign technology and broadband specialists presented their positions and commended their expertise to the conference participants.

The main topics of the Conference were the following:

- Development Policies of the Broadband Internet: the focus was on the national policies, the international partnerships for the promotion of broadband Internet, as well as to the way that the political parties approach this issue.
- International Applications of the Broadband Internet: the focus was on the regulatory actions for the promotion of these applications, the importance of broadband for the Public Administration, the regional development, education and entrepreneurship.
- The Greek Reality for Broadband Internet: this section hosted the views of market and consumers' representatives for this specific topic.

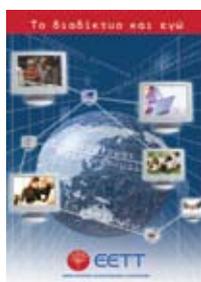
The Conference was inaugurated by the Minister of State, Mr. Theodoros Rousopoulos. The main speaker was the European Commissioner for Information Society and Media, Mrs. Viviane Reding.

Broadband Week

During the period 17 - 23 May 2007, EETT organized the Broadband Week in the subway station of Syntagma Square.

In a specially shaped hi-tech environment, the visitors had the ability to visit the kiosks of the participated institutions and use various broadband applications. The goal of this specific initiative was for the public to discover the benefits and the usefulness of broadband services, as well as to be informed about the actions implemented and programmed by the state, aiming at broadband growth.

Information Leaflet "Internet and Me"



This specific leaflet provides useful information about Internet and its best possible utilization by the consumers.

Specifically, it informs about Internet's possibilities, as well as about Internet access and the search for information. Also, it focuses on Internet's usefulness to different sectors, such as education and labor and to the transactions with Public Services and other agencies for dispatching certain

cases. Finally, it underlines the role that Internet plays for the modern communication forms, the search for information, as well as to the daily issues of financial or social context.

Information Leaflet “Get to Know Broadband. Get in Orbit...”



In the framework of the broader public information on broadband, EETT issued an information leaflet addressed to consumers. Specifically, this leaflet provides spherical information on broadband and the necessary steps for broadband connection. Also, it focuses on the broadband provided conveniences for business or residential people.

Information Campaigns on Broadband Internet

Among EETT's priorities is the constant and detailed information of Greek residents about the modern technological possibilities of the Electronic Communications sector and the broadband promotion. Under this scope and within the information campaign context under the title “Broadband: Wherever you are, you are in the centre of the world”, EETT organized respective campaigns in regional cities.

In 2007, relevant four and three day campaigns took place in Loutraki and Nea Makri respectively. In a specially shaped kiosk, the visitors had the ability to obtain information about broadband Internet and use broadband applications and services.





03 Electronic Communications Sector



The actions of EETT on the Electronic Communications sector focused on the following directions.

EETT, as mentioned in Chapter 2, intensified its actions in order to create the appropriate conditions for increasing the broadband penetration and the consumers' habituation to these services.

Regarding its regulatory role, it completed the analysis of the individual markets based on the European Regulatory Framework and the majority of the actions needed for the adaptation of the secondary legislation to the new legislative framework.

Finally, it undertook actions for promoting and ensuring the competition in networks and services. Towards this direction, it handled a series of subjects regarding Interconnection, the cost audits, the operators invoice policy and the mergers/ acquisitions that took place within the market. Additionally, it provided for the creation of the appropriate conditions for the provision of Voice over Internet Protocol (VoIP) and other innovative services. Furthermore, it carried on its actions for the spread of Electronic Signature.

3.1. Completion Progress of the Secondary Legislation

In 2007 EETT completed the majority of the residual actions in the Electronic Communications Sector for the adaptation of the secondary regulatory framework to the provisions of Law 3431/2006 and hence, the harmonization of Greek legislation to the European Regulatory Framework.

Specifically, it issued the Regulation on the Management and Assignment of Numbering Resources of the [National Numbering Plan \(NNP\)](#) and submitted Proposals to the Ministry of Transport and Communications (MTC) regarding:

- The ensuring of affordable invoices within the provision context of Universal Service (US).
- The determination of special adjustments for consumers, such as disabled people.
- The determination of the procedures for granting Rights of Way.

Also, the following Regulation Plans are under the process of either conducting a Public Consultation or processing the results of the Consultation:

- The Regulation Plan that determines the quality indicators of the provided Electronic Communications services, the context and the shape of the published

information, as well as the way and time of their publication by the operators.

- The Collocation Regulation Plan.
- The Regulation Plan that sets the performance goals in the US provision and also, determines the context and the shape of the published information, as well as the method of publication by the [Universal Service Providers \(USP\)](#).

3.2. Market Analysis on the basis of the European Regulatory Framework

In 2007, EETT completed the analysis of the competition level of the individual markets and sub-markets of Electronic Communications, following the prospective procedures under the European Regulatory Framework²⁹ (Public Consultation, Communication to European Commission, Measures Plan adoption).

Analytically:

- Market I (Retail Access Market to the Public Telephone Network at a Fixed Location via High-Capacity Connections - Primary Rate Access ISDN): According to EETT's relative Regulation³⁰, OTE was determined to be the operator with [Significant Power in this Market \(SMP\)](#) and was imposed inter alia the non-discrimination obligation.

29. Directive 2002/21/EK of the European Parliament and Council of the 7th March 2002 (Framework Directive).

30. EETT Decision 425/094/08-03-2007, GG Issue 483/B/05-04-2007.



- Markets 4 and 6 (Retail Markets of Publicly Available Telephone Services from a Fixed Location for Residential and Business Clients): According to EETT's Regulation³¹, the examined markets are sufficiently competitive and thus, there is no need to determine an operator with SMP. Additionally, the relative regulatory obligations imposed to OTE were raised.
- Market 17 (International Roaming Market on Public Mobile Networks): In February of 2007, EETT adopted³² a Measures Plan according to which no operator has SMP, individually or jointly.
- Market 18 (Market of Wholesale Broadcasting Transmission Services): According to Law 3592/2007³³, EETT was determined to be the responsible Authority for the analysis of the competition level in the wholesale broadcasting transmission market. In November of 2007, it adopted³⁴ the relative Measures Plan, according to which no operator enjoys SMP, individually or jointly.

It is noted that according to the current Framework and in the case that a market is proven to be insufficiently competitive, EETT must determine the operator or operators that have SMP and impose the perspective regulatory obligations on them.

3.3. Promotion and Ensuring of Healthy Competition in Networks and Services

3.3.1. Interconnection

EETT approved³⁵ the new **Reference Interconnection Offer (RIO)** which replaces that of 2003. It is noted that the publication of RIO³⁶ is one of the most important regulatory obligation of OTE, as an operator with SMP in the Interconnection wholesale markets.

EETT amended significantly the RIO subjected by OTE, aiming at meeting the current needs of the market. The new RIO regards the Interconnection wholesale markets of public fixed networks (call origination, termination and transit) and regulates substantially the relationships between the operators of Electronic Communications and OTE on Interconnection issues.

Specifically, it defines the prerequisites and the procedures, upon which OTE provides the necessary services and the relative conveniences to the operators of networks and

services of Electronic Communications. In this way, the operators are able to provide equally competitive services.

Analytically, it determines:

- The possible materialization ways for the Interconnection of physical circuits between networks.
- The regulations based on which the cost of Interconnection circuits is allocated.
- The terms that govern the individual wholesale services of call origination, termination and transit.
- The procedures of the commercial management of operators' requests, relating to information provision, the request for initial Interconnection, the materialization of particular Interconnection circuits and the provision of the Collocation conveniences.
- The financial terms relating to Interconnection, including the procedure of invoicing-payment, the resolution of financial differences and the terms for the provision of letters of guarantee.

Overall, the new RIO includes all the terms, the prerequisites and the obligations of Service Level Agreements (SLA) on issues relating to the provision of services, the report and the restitution of damages, as well as the perspective clauses.

3.3.2. Local Loop Unbundling

EETT decided³⁷ to impose Instant Measures on OTE concerning **Local Loop Unbundling (LLU)** issues, according to which OTE is obligated to:

- Activate the shared and full loops that were requested by alternative operators' consumers by 15 of June 2007.
- Deliver to the alternative operators the additional pairs of connecting cable that have been requested for serving consumers' requests on Local Loops by the end of June of 2007.

OTE complied partially with the above and consequently in October of 2007, EETT, in the aftermath of a respective Hearing, imposed³⁸ a fine of 3,000,000 euros on OTE. Furthermore, EETT addressed a Recommendation to OTE to refrain from any future conducts, which breach the obligations set by the current Competition and Electronic Communications' legislation, as well as its relative decisions.

31. EETT Decision 425/093/08-03-2007, GG Issue 467/B/04-04-2007.

32. EETT Decision 423/023/22-02-2007, GG Issue 473/B/05-04-2007.

33. "Concentration and Licensing of Media Enterprises and other provisions", GG Issue 161/A/19-07-2007.

34. EETT Decision 458/156/21-11-2007, GG Issue 2310/B/05-12-2007.

35. EETT Decision 437/002/01-06-2007, GG Issue 1014/B/21-06-2007.

36. EETT Decision 406/34/11-10-2006, GG Issue 1669/B/18-07-2006.

37. EETT Decision 439/041/07-06-2007.

38. EETT Decision 455/75/05-10-2007.

Table 3
Comparative Data for Universal Service Provision, 2003 - 2007

Data for Universal Service Provision	31-12-03	31-12-04	31-12-05	31-12-06	31-12-07
Pending applications for connection to the fixed public telephony network due to lack of network or need for upgrading.	1,541	2,133	1,817	4,468	5,192
Number of subscribers connected to analogue centres and therefore could not have all network facilities.	18,093	617	0	0	0
Number of subscribers for which the capability of data transfer services at a speed over 9.6 kbps is not available*.	75,945	153,641	130,381	132,816	128,153
Number of public payphones installed by the USP.	64,619	64,105	64,298	59,827	57,812

*The majority of those subscribers were connected to PCM-4 systems, the replacement of which was not reduced by the USP.

Furthermore, EETT decided³⁹ to impose new Instant Measures on OTE (with an imposition of a sanction threat), in the aftermath of an investigation made to OTE's information system and of examining complaints filed by alternative operators, regarding OTE's non-compliance with its anticipated obligations (primarily the deadlines) under the new Reference Unbundling Offer (RUO).

According to EETT's Decision, OTE is obligated to satisfy the pending overdue requests of the operators for:

- The activation of active and inactive Local Loops, within 5 and 10 working days respectively.
- The delivery-activation of the Internal Connecting Cables (ICC) in the **Physically Collocated** areas, within 15 working days.
- The construction of manholes for the operators in the Local Exchanges within 30 working days.

3.3.3. Safeguarding Universal Service Provision

According to EETT's Decision⁴⁰, OTE still remains the USP until the completion of the procedures for the USP definition under Law 3431/2006. The USP is obligated to submit an annual report to EETT, regarding the US provision. Table 3 presents the data for the period of 2003 - 2007.

The following conclusions can be deduced from the above Table:

- The pending connection applications to the fixed public telephone network kept on increasing as a result of the constant need for new connections.
- The old fashioned subscription systems that hinder the subscribers' access to Internet at speeds higher than 9.6 kbps, were reduced only by 4,663 subscribers.
- The number of the installed public payphones decreased by 2,014.

Further to the above, the US Report mentions the ongoing procedures of the US provision to vulnerable social groups, the issue and distribution of the **Comprehensive Directory** in all Greek Territory, as well as the access service to the Comprehensive Directory's Database.

Additional information about the US provision by the USP is shown in Table 4. The first column shows the quality indicators with the expected performance set by EETT⁴¹, while the next columns display the performance indicators reported by the USP for the period 2003 - 2007.

39. EETT Decision 455/75/05-10-2007.

40. EETT Decision 367/49/14-12-2005, GG Issue 22/B/17-01-2006.

41. EETT Decision 253/83/14-06-2002, GG Issue 874/B/12-07-2002.

Table 4
Performance of the Universal Service Provider, 2003 - 2007

Indicator	2003	2004	2005	2006	2007
Time for the provision of initial connection: 1 week for 95% of applications	Not available				
Frequency of failures per 100 connections per year: 13.5%	13.6%	13.8%	12.8%	13%	12.4%
Call Failure Percentage: 2%	2.8%	3.2%	2.3%	2.6%	1.56%
Percentage of failures repaired by the following working day: 85%	82.1%	80.8%	82.3%	78.6%	85.4%
Response time for operator services: 20 sec.	20	Not available	15	15	25
Response time for directory services: 15 sec.	20	Not available	12	15	20
Complaints about erroneous bills: 0,2%	Not available	Not available	0.044%	0.087%	0.077%

3.3.4. Inspections of Electronic Communications Operators

During 2007, EETT continued to inspect Electronic Communications operators either ex-officio or after complaints. The concentrated data was processed and in cases of law infringement, EETT conducted Hearings of the involved operators in order to impose the legal administrative sanctions.

It is noted that EETT via those inspections ascertains the compliance degree of the operators with their obligations and safeguards the consumers' rights from unlawful and excessive commercial policies.

These inspections are either onsite at the operators' infrastructures and facilities or made by distance. During the onsite inspections, EETT personnel is entitled to inspect the offices and the rest of operators' facilities, audit all the company's books, records and documents, as well as to receive sworn or non-sworn evidences at its discretion. In the cases of distant investigations, it is entitled to perform investigations via telephone calls, e-mails and other communication forms –simulating scenarios of usage for certain services (e.g. a consumer that requests the Carrier Pre-selection service)- and to request, within this framework, the necessary information.

3.3.5. EETT's Decision on VODAFONE and the Interceptions' Case

In January of 2007, EETT looked into the case of interceptions, in the aftermath of the Decision made by the Hellenic Authority for the Information and Communication Security and Privacy (ADAE)⁴², according to which VODAFONE had breached the legislation for communications' security and a fine was imposed on the company.

EETT, via a Hearing, examined if VODAFONE had infringed upon the provisions of the current, at that time, telecommunications' legislation and specifically the terms of the company's Individual Licence for the operation of the 2nd Generation Mobile Communications networks. Afterwards, EETT issued a Decision⁴³, according to which, VODAFONE had breached the terms of its Individual Licence and specifically, the obligation for safeguarding the communication privacy and enabling the state Authorities to remove the privacy, the obligation for network's maintenance and security in combination with the provisions that foresee the possessor's responsibility for his/ her actions against the consumers. Furthermore, VODAFONE infringed upon its obligations regarding the quality and its specifications for network provision, as well as for the licensed services and the consumer's protection. Consequently, EETT imposed on VODAFONE a total fine of 19,100,000 euros.

42. ADAE Decision 05/2007.

43. EETT Decision 457/53/18-10-2007.

3.3.6. Competition's Examination (ex-post) of OTE's Packages

EETT, in the aftermath of investigating consumers complaints for OTE's practices and invoicing policy in the broadband services (Conn-X package of the period 2004 - 2006), ascertained important infringing conducts and violation of the legislation for free competition from OTE's side. Consequently, EETT decided⁴⁴ to impose on OTE an administrative fine of 20,000,000 euros for the considerable and continuous (from 2004) abuse of dominant position⁴⁵ in the broadband market, in the form of margin squeeze.

According to the results of EETT's investigations, this infringing practice was not related so much with the retail prices of OTE's broadband offers, as with the difference between the retail prices and the wholesale invoices. Specifically, OTE retained a small difference –smaller than the one anticipated by competition law- between the wholesale price (the one used to sell ADSL broadband connections to the alternative operators) and the retail price (the one used to sell the same service to its subscribers). The difference was so small that did not enable the alternative operator to cover its necessary expenditure in order to provide retail broadband services competitive to those of OTE.

The above practices had as a consequence either the forced exit of the alternative operator from the market or the incurring of significant losses given that the operator was compelled to sell its services with the same retail price as OTE. Such practices can hinder the development of the operators, as well as their financial viability. In the long run, competition is damaged resulting in high retail prices and to a further extent, in restraining the innovation and the offer of new services.

3.3.7. Regulation of Voice over Internet Protocol (VoIP) Issues

In 2007, EETT amended the Regulation of General Licences⁴⁶ in order to include a special regulation for the Voice Services via IP Protocol or/ and Voice Services via Internet. A respective Public Consultation during the period 2 May - 4 June 2007 preceded the Amendment.

Specifically, additional obligations for the VoIP service provision were determined, among which the most important ones were the following:

- Explicit report in the contract that the service in question depends on the network and the Internet connection and consequently, its provision can be interrupted in case of a blackout.
- The consumer is not allowed to use permanently the **geographic numbers** assigned to VoIP services outside the geographical areas for which the number is assigned.
- As far as the possibility of call making to the European emergency number "112" is concerned, the operator is obligated to inscribe distinctly on the contract's first page a statement regarding:
 - ▶ The possibility of call making to that specific number.
 - ▶ The possibility of sending the location data to the responsible Authority of the calling party.
 - ▶ The risk possibility of a delayed or failed call delivery to the Emergency Agency.

These specific amendments aim at solving issues regarding the management of national resources in time and the protection of consumers' interests.

3.3.8. Mergers/ Acquisitions

During 2007 important realignments took place in the Electronic Communications market. Specifically, the trend for the "integration" of the operators persisted, in order to strengthen their position in the market.

EETT, within the context of its responsibilities as the Competition Commission for the Electronic Communications market, investigated⁴⁷ the notified agreements. Specifically, it proceeded either to investigating the merger data (case of article 4^a of Law 703/1977) or to analyzing extensively the relative operation market of each operator based on the respective revenues (case of article 4^b of Law 703/1977), in order to ascertain any potential case of competition obstruction.

The agreements that took place and were approved by EETT were the following:

1. Merger of LANNET with TELEPASSPORT, with the latter being acquired by the former.
2. Acquisition of the 100% of ATTIKES TELECOMMUNICATIONS' share capital by HELLAS ON LINE.
3. Acquisition of the 51% of HELLAS ON LINE's share capital by JSC COMSTAR-UNITED TELESYSTEMS and INTRAKOM.

44. EETT Decision 447/01/26-03-2007.

45. Violation of article 2 of Law 703/1977 on free competition.

46. EETT Decision 442/068/28-06-2007, GG Issue 1279/B/25-07-2007, which amended EETT Decision 390/3/13-06-2006 "Regulation of General Licences", GG Issue 748/B/21-06-2006.

47. According to Law 703/1977.

4. Acquisition of the 100% of TELEDOME's share capital by INTRAKOM Holding.
5. Acquisition by WIND of the 50% plus a stock of the Dutch limited liability company WIND PPC HOLDING's (TELLAS HOLDING) share capital and voting rights, which possessed the 100% of share capital and voting rights of TELLAS.

3.3.9. Carrier Pre-Selection

As far as the Carrier Pre-Selection was concerned, EETT investigated the compliance degree of the operators with the anticipated procedures for rendering this service and the respective regulatory framework regarding the following issues:

- Activation of the Carrier Pre-Selection at the explicit consent of the consumer.
- Transaction of all consumers' demands for retraction/ de-activation of the service.
- Complete information for the consumers about the terms of the contract.
- Investigation of the cases where the debit and the issue of bills carry on even after the de-activation of the Carrier Pre-Selection.

Towards this direction and in the aftermath of complaints filed by consumers, EETT conducted a series of Hearings and impose the following fines:

- On TELLAS⁴⁸ a total of 1,400,000 euros for arbitrary activation, failure to transact the Carrier Pre-Selection de-activation requests, insufficient information of the subscribers about the terms of the contract, as well as for charging subscribers after the de-activation of the service.
- On VIVODI⁴⁹ a total of 170,000 euros for arbitrary activation without the subscriber's consent.
- On TELEDOME⁵⁰ a total of 150,000 euros for arbitrary activation and cancellation of the service de-activation requests without the subscriber's consent.
- On COSMOLINE⁵¹ a total of 100,000 euros for arbitrary activation, failure to transact the Carrier Pre-Selection de-activation requests, as well as for charging subscribers after the de-activation of the Pre-Selection.

- On FORTHNET⁵² a total of 100,000 euros for arbitrary activation.

It is noted that EETT has access to OTE's information system that is being used by every operator for transacting the Carrier Pre-Selection's applications, in order to closely monitor the market and detect possible malfunctions.

3.3.10. Number Portability

Number Portability increased significantly during 2007, since the fixed and mobile telephony numbers that were transferred to another operator exceeded 650,000, compared to 162,565 numbers in 2006 and 77,044 numbers in 2005 respectively.

In total, 916,314 subscribers kept their phone numbers while switching to another operator during the period March 2004⁵³ - December 2007. Among them, 542,048 were mobile telephone numbers and the rest 374,266 were fixed telephony numbers.

The most important factor that contributed to this positive progress was the increase of LLU for the provision of bundled services –such as telephony and broadband services- which at the 98% of the cases was combined with Number Portability.

3.3.11. Cost Audits

During 2007, EETT conducted and completed, in co-operation with independent agencies, the two cost audits for 2006 and 2007 respectively. At the same time, in December of 2007, the cost audit for 2008 kicked off (actual data as of 2006). Analytically:

- OTE's Cost Audit for 2006 (actual data as of 2004): EETT approved⁵⁴ the cost audit results of OTE, a fact that resulted to cost-oriented prices for important services⁵⁵.

The cost-oriented prices for wholesale Leased Lines (excluding the ones for Interconnection) were not implemented by OTE since the retrospective price

48. EETT Decisions 447/03/26-07-07, 447/04/26-07-2007, 447/05/26-07-2007, 459/14/19-II-2007.

49. EETT Decisions 447/07/26-07-2007, 459/13/14-II-2007.

50. EETT Decision 459/12/14-II-2007.

51. EETT Decision 459/15/14-II-2007.

52. EETT Decision 459/11/14-II-2007

53. When the operation of the National Reference Data Base for Number Portability (EVDAF) began, namely the special data base for the facilitation of Portability in Greece.

54. EETT Decision 418/016/19-01-2007, GG Issue 253/B/27-02-2007.

55. Interconnection (Call Origination and Termination, Transit, Other Interconnection Services, Carrier Pre-Selection), Interconnection Circuits, LLU Monthly Rental, Retail Telephony Services, as well as Wholesale and Retail Leased Lines.

implementation for 2006 would have led to the restriction of the competition in the shape of a price margin squeeze, taking into consideration the inability for a retrospective retail price implementation. Additionally, OTE was able to implement retrospectively the fees for Distant Collocation and LLU, though not cost-oriented, provided that the counter-contracting operator had agreed.

It is noted that the delayed completion of the cost audit was due to the overdue submission of the cost-audited data by OTE to EETT.

As far as the 2007 invoice policy of OTE was concerned, EETT set as temporary invoices the 2006 cost audit results for the services of Interconnection, Interconnection Leased Lines, LLU, as well as for the retention fees. At the same time, the 2006 temporary invoices⁵⁶ were still in force for the wholesale Leased Lines (excluding the Interconnection Leased Lines) and for the rest of the regulated retail services, excluding the retention fees, up till the completion of the 2007 cost audit.

- OTE's Cost Audit for 2007 (actual data as of 2005): EETT approved⁵⁷ the cost audit results of OTE, setting the limits for the cost-audited environment (retail and wholesale invoices) in which the operators are able to offer their services for 2007. The cost audit in question included the services of Interconnection, LLU (including the Collocation services), Interconnection Leased Lines, end to end wholesale and retail Leased Lines, retail access to the public telephone network at a fixed location and publicly available telephone services

provided at a fixed location. The costs for the aforementioned services were determined based on the following cost-accounting methods i) Long Run Average Incremental Cost (LRAIC) and ii) Fully Distributed Cost (FDC). The method of Price Cap was used for the retail telephony services.

It is pointed out that the specific Decision was taken at the end of the semester of the cost-audited year contrary to the cost audits of previous years that were overdue.

- OTE's Cost Audit for 2008 (actual data as of 2006): This specific cost audit kicked off in December of 2007. The submission of the majority of data was completed by OTE up till the end of that month. The results of this cost audit are expected within the first months of 2008.

These particular actions are considered to be especially important for the market of Electronic Communications, since the announcement of the cost-audited invoices of the regulated services enables the operators to formulate their commercial policies in time.

3.3.12. National Numbering Plan

In the aftermath of EETT's Proposal and MTC's relative Decision⁵⁸, new series were added to the National Numbering Plan (NNP). The goal was to modernize the NNP in order to meet the needs of the market and also, to create the proper conditions for the development of innovative services that will meet the consumers' needs. The NNP's new series are presented in Table 5.

Table 5
The New Series of the National Numbering Plan

Series of Numbers	Use
140-144	Five-digit network short codes for the provision of Multimedia Messaging Services (MMS)*
145-149	Five-digit short codes for the provision of MMS*
190-195, 54	Five-digit short codes for Short Message Services (SMS)
806	Numbers for providing services with an upper limit charge of 0.06 euros/ min.**
812	Numbers for providing services with an upper limit charge of 0.12 euros/ min.**
825	Numbers for providing services with an upper limit charge of 0.25 euros/ min.**
899	Numbers for accessing data services with a charge bigger than 0.02 euros/ min.**

* With the reservation that the provided services are not related to adult-only services.
** VAT is included.

56. EETT Decision 381/02/03-04-2006, GG Issue 558/B/04-05-2006.

57. EETT Decision 443/068/09-07-2007, GG Issue 1422/B/08-08-2007.

58. MTC Decision 26634/924/03-05-2007 "National Numbering Plan for Electronic Communications Services", GG Issue 768/A/2007.

Furthermore and following the conduct of a Public Consultation, EETT issued on the 21st of June 2007 the new Regulation⁵⁹ for the Management and Assignment of the NNP numbers, which:

- Determines the procedures and the terms for the submission and the checking of the application related to the primary assignment of numbering resources, as well as to their assignment.
- Includes the conditions under which EETT's Decisions on the primary assignment of numbering resources and on their assignment and usage fees can be amended, repealed or revoked.
- Sets the usage terms of the numbers assigned by EETT.

The new Regulation applies both for the current and the new numbering series.

The most important amendments brought by the new Regulation compared to the old one were the following:

- a. The management and the assignment of the Short Message Services (SMS) and Multimedia Messaging Services (MMS) codes are now materialized by EETT.
b. The above codes are five-digit and are part of the 190-195 and 54 series.
c. The SMS/ MMS short codes that are not included in the above series must be de-activated by the 15th of May 2008.
- The services for the dial-up access to Internet will be provided via numbers of the 896 and 899 series. The 896 series is used when the charge is less than 2 eurocents/ min. and the 899 series is used when the charge is over 2 eurocents/ min. All the current services for the dial-up access to Internet, that are being provided via numbers of other series, will be transferred to numbers of the aforementioned series within 1 year from the issue of the Decision.
- The network short codes of the 12 and 13 series, excluding the 138 series, are no longer required to be assigned by EETT.
- The blocking of NNP's numbering resources does not any longer hold. The numbers that are currently blocked will remain under this regime until the expiry of the current blocking duration.

The above changes in combination with the introduction of the new series in the NNP will considerably facilitate the operators to offer innovative and forthcoming services.

3.3.I3. E-Signature

EETT aiming at strengthening the consumers' confidence to e-signature and at further developing the relative market, conducted audits of the e-signature certification services market.

EETT via those audits can determine the compliance degree of the **Certification Service Providers (CSPs)** with the regulatory framework for the provision of certified services of e-signature and mainly the criteria and the requirements of issuing the certificates, under which the user can sign electronically and this sign will be equivalent to the handwritten one.

Towards this direction, EETT proceeds to the following steps:

- Audit of the CSPs' documents related to the provided services as to their completeness and compliance with the current legislation.
- On-sight inspections of the CSPs' infrastructure, in order to determine their compliance degree with the manufacturing, technical, operational, procedural and organizational demands of the regulatory framework.

Simultaneously, in order to promote the e-signature to the Greek market, EETT is working with the competent public institutions that plan or materialize e-government applications.

3.3.I4. Domain Names Assignment

The increase rate of the applications and assignments of [.gr] **Domain Names** was still high enough for 2007, however at a slower pace compared to 2006. Analytically, the assignment rate increased by 21% compared to 36% of 2006 and this reduction is attributed to the broader maturing of Internet market in Greece.

The total number of the assigned Domain Names, including the sub-domains (.com.gr, .net.gr, .org.gr, .edu.gr, .gov.gr) is presented in Table 6.

59. "Regulation for the Management and Assignment of Numbering Resources of the National Numbering Plan", EETT Decision 441/121/21-06-2007.

Table 6
Assigned [.gr] Domain Names during 2006 - 2007

Domain Level	2006	2007
.gr	160,734	194,307
.com.gr	6,558	8,283
.net.gr	645	749
.org.gr	551	413
.edu.gr	342	631
.gov.gr	93	105
Total	168,923	204,488

Table 7 displays the number of assignments compared to the number of applications per month for the period January – December of 2007. The average assignment percentage in relation to the applications ranged at 92%, compared to 91% of 2006 and 87% of 2005 respectively. It is pointed

out that as time measure was set to be the date of application and not the date of EETT Decision for Assignment/Rejection, in order for the data of the Table to be comparable.

Table 7
Number of Assigned [.gr] Domain Names in Relation to the Applications, 2007

Month	Applications	Assignments	Rejections
January	5,788	5,450	338
February	5,928	5,573	355
March	6,790	6,399	391
April	5,650	5,263	387
May	6,030	5,754	276
June	5,673	5,407	266
July	5,937	5,599	338
August	4,156	3,895	261
September	5,633	5,289	344
October	6,669	6,330	339
November	6,703	6,309	394
December	5,674	3,846	1,828
Total	70,631	65,114	5,517

3.4. Controlling and Monitoring Actions of EETT

Subject	Number of Hearings	Fines	Recommendations	Exemptions	Other Sanctions/ Decisions
Carrier Pre-Selection	12	12			
Local Loop Unbundling	15	13		2	
Dialer	60	2	1		57
Cost Audit issues	1	1			
Comprehensive Directories	2				2
Interconnection/ Numbering/ Leased Lines	5	2	3		
Competition/ Significant Market Power	7	2	1		4
Domain Names	36			8	28
Other	2			2	
	140	32	5	12	91

It is noted that the Decisions on Hearings held by EETT are subject to judicial control in accordance with the applicable Law.

3.5. Goals

The main goals set by EETT in the Electronic Communications sector for 2008 are the following:

- Increasing the competition in the voice and broadband markets, as well as encouraging the operators to invest.
- Strengthening of LLU growth, safeguarding the access equality and broadband growth in the Greek Region.
- Promoting the regulations for accessing the sub-loop, Interconnection and Fiber To The Home/ Cabinet (FTTH/ FTTC).
- Encouraging the development of advanced technologies and determining the business model for the transition to Next Generation Access (NGA) networks and the development of FTTH networks.
- Supporting the introduction and the development of products that bundle fixed and mobile telephony, as well as innovative offers.
- Informing and educating the involved parties aiming at ensuring the implementation of digital services.
- Providing further clarity to consumers and enabling them to compare the offered products.
- Safeguarding the unremitting availability of services and networks of Electronic Communications.
- Informing and educating the consumers about the innovative services.





04 Radiofrequency Spectrum



The radiofrequency spectrum is a scarce national resource, indispensable for the operation of modern Electronic Communications and services of major importance, like air navigation and emergency services.

The optimum use of spectrum constitutes a basic priority of EETT for two main reasons. On the one hand, the fact that the total of frequencies that can be made available in a particular geographical area is finite. On the other hand, the fact that the continuous advancement of new technologies and the increased use of wireless services maximize the needs for spectrum use.

In this framework, EETT during 2007 focused on the effective management and monitoring of radio spectrum. In addition EETT issued the total of regulatory actions and Proposals deriving from the new Law on Electronic Communications.

4.1. Completion of Secondary Regulation

In 2007, EETT completed all the necessary actions in the sector of radiofrequency spectrum for the adaptation of secondary regulatory framework to the provisions of Law 3431/2006 and consequently, the harmonization of Greek regulation to the European Regulatory Framework.

Specifically EETT issued the following Regulatory Decisions.

- **Regulation on the Transfer of Radiofrequency Rights of Use⁶⁰**

This specific Regulation sets for the first time, the terms, the conditions and the procedure of transfer, leasing or change of control of Radiofrequency Rights of Use. The provisions of the Regulation regard spectrum Rights of Use as a whole and do not foresee any type of segmentation. The application of this specific Regulation will ensure the optimum use of radio spectrum since every Right of Use can be transferred to the operator who will better utilize it at that specific moment.

- **Regulation on the Attribution of an Annual Fee to the Greek Atomic Energy Commission (GAEC) for the Installation and Operation of Antenna Constructions⁶¹**

This specific Regulation sets the terms and procedures for the collection from EETT and the attribution to the

GAEC, of an annual fee for the installation and operation of every licensed antenna construction which is used for the provision of Electronic Communications networks or services.

Furthermore and apart from the above regulations, EETT worked out the following Proposals to the Ministry of Transport and Communications (MTC):

- Special Licensing Procedure, where the installation of Standardized Antenna Constructions lies.
- Exceptions of Stations and Antenna Constructions from the Licensing Procedure.
- Transfer or Leasing of a part of a Radiofrequency Right of Use.

Finally, in the context of the adaptation to the new regulatory framework, the procedure of converting the Individual Licences of Electronic Communications operators to Radiofrequency Rights of Use was completed in 2007. Specifically, the following were issued:

- 6 Rights for 2nd Generation Mobile Communications networks (GSM).
- 6 Rights for Fixed Wireless Access (FWA) networks in the band of 26 GHz.
- 3 Rights for 3rd Generation Mobile Communications networks (UMTS).
- 2 Rights for FWA networks in the band of 3.5 GHz.
- 1 Right for a TETRA network.

60. EETT Decision 428/I3/2007, GG Issue 638/B/27-04-2007.

61. EETT Decision 417/O1/2007, GG Issue 183/B/14-02-2007.



4.2. Radiofrequency Rights of Use and Spectrum Monitoring

4.2.1. Fixed Service

During 2007 the following were granted:

- 1,257 Radiofrequency Rights of Use for point to point links, which mainly, concerned backbone networks of companies that provide Electronic Communications services to the public.
- 110 Radiofrequency Rights of Use to meet private Electronic Communications needs, mainly for the transmission of radio and TV program from production point (studio) to the transmission point.

Moreover, EETT received 35 complaints regarding **interference** problems to **fixed service** systems:

- 17 concerning interferences in licensed radio links of radio-TV stations.
- 14 concerning the legitimacy and interference control in wireless access systems (**Wi-Fi**).
- 4 concerning the legitimacy of radio links.

EETT technical units took all the necessary actions for the immediate investigation and resolution of the aforementioned complaints.

Furthermore, EETT proceeded to an extensive monitoring campaign of radio links signals all over Greece, transmitted in the frequencies up to 3 GHz. During this procedure, illegal broadcasts of radio links for the transmission of radio and TV station signal to frequency zones already assigned to GSM/ DCS/ UMTS mobile telephony services, as well as to the development of defence systems and aeronautic navigation systems, were located.

EETT addressed Recommendations in order for those radio stations to cease their operation and to apply for the **granting of Radiofrequency Rights of Use**. The majority of them complied with EETT requests while the foreseen administrative fines were imposed on the remaining ones.

4.2.2. Satellite Services

In the framework of the anticipated procedures of the International Telecommunication Union (ITU), EETT proceeded with the harmonization of the domestic and foreign satellite stations with the existing terrestrial wireless networks in order to avoid interferences. Under this scope, EETT informed the MTC about the domestic ter-

restrial satellite stations, in order for the latter to communicate them to the ITU, as required by the International Radio Regulation.

It is noted, that according to EETT Decision⁶², Radiofrequency Rights of Use are no longer granted to **VSAT** topology stations, as long as specific technical terms⁶³ and conditions⁶⁴ are met. The simplification of the procedures achieved by this specific Regulation contributes to the deployment of broadband networks in the country.

In 2007, EETT licensed 1 receiving terrestrial satellite station for the collection of meteorological data and authorized the transfer of 4 existing spectrum usage rights⁶⁵.

Furthermore, 6 requests were submitted by European National Regulatory Authorities (NRAs) related to the co-ordination of satellite terrestrial networks, either to fixed service networks or to the national satellite network HELLAS SAT. The requests were forwarded to the MTC as the competent body. In the cases of satellite terrestrial networks coordination, EETT opinion preceded.

Finally, 10 complaints for interference in satellite data gathering systems were submitted by the Hellenic National Meteorological Service (EMY), the National Observatory, the Maritime Search and Rescue Coordination Centre, the Hellenic Broadcasting Corporation (ERT) and the European Organization of Satellite Communications (EU-TELSAT). The majority of the problems were due to the fixed service radio links, which interfered with the terrestrial satellite receivers. EETT promptly performed all necessary measurements and inspections to resolve these problems. At the same time, EETT performs regular inspections of this specific band of frequencies.

4.2.3. Mobile Service

Mobile Telephony Networks

EETT received 98 complaints related to interferences in the spectrum assigned to mobile operators. Specifically, they concerned interferences in the reception frequencies of base stations, communicating with mobile telephones.

The main sources of interferences were the following:

- Radio link systems used for video and audio signals transmission from radio and TV stations and military agencies.

62. EETT Decision 399/34/16-08-2006 "Regulation on Terms of Use of Individual Frequencies or Frequency bands", GG Issue 1456/B/03-10-2006.

63. In relation to the transmitted power and the antenna diameter of the station.

64. Distances > 500m from airport enclosure.

65. EETT Decision 428/13/29-03-2007 "Regulation on the Transfer of Frequency Rights of Use", GG Issue 638/B/27-04-2007.

- Systems impeding the use of mobile telephony devices⁶⁶.
- Interference transmissions from broadcasting radio and TV stations.
- Wireless analogue telephony apparatus.

EETT technical units proceeded to the immediate investigation and resolution of those complaints.

Private Mobile Radio Networks for Non Governmental Services

Private Mobile Radio (PMR) networks meet the communication needs of various business users, as well as emergency services. In accordance to Law 3431/2006, PMR Licences, fall in the category of General Licences issued by EETT. Furthermore, EETT is responsible for granting the Radiofrequency Rights of Use for PMR networks. Nevertheless it does not issue any more Radiofrequency Rights of Use for the networks of Prefecture Authorities, Ministries, Embassies, National First Aid Centre (EKAB) and other governmental agencies⁶⁷.

In 2007, a total of 126 requests were submitted, either for new PMR networks or for the modification of the existing ones. In 103 of the above cases Radiofrequency Rights of Use were granted while in 2 cases temporary Radiofrequency Rights of Use have been assigned for athletic and other related events.

As far as interference issues were concerned, EETT received 46 complaints for PMR networks. Among them, 7 concerned critical PMR networks and were dealt with priority, while 23 complaints related to radio taxis networks, municipality radio networks and private companies' networks. The majority of them involved the use of non licensed radiofrequencies and the interference broadcasts of other PMR networks. Moreover, EETT received 40 complaints of private individuals regarding the legitimacy of PMR antenna systems, as well as interferences in UHF band.

In all the above cases, technical inspections were performed and the necessary actions to resolve the problems were immediately scheduled, while the anticipated sanctions were imposed when necessary.

4.2.4. Services Ancillary to Broadcasting and Program Making

EETT grants permanent Radiofrequency Rights of Use for meeting the needs of radio or TV stations (signal transmission links) or temporary Radiofrequency Rights of Use for

the coverage of scheduled events with a maximum duration of 2 months.

In 2007, 9 Radiofrequency Rights of Use were granted to Satellite News Gathering (SNG) stations. They mainly concerned portable satellite image and sound transmission stations from international users for the coverage of special events. Typical examples of such events are VIP visits and athletic events, like preliminary Champions League matches.

Moreover, temporary Radiofrequency Rights of Use outside the Attica Prefecture were granted to 2 radiocommunications stations for wireless camera use for image transmission and 1 for PMR voice transmission.

It should be mentioned that, no Radiofrequency Right of Use is required for wireless microphones and in-ear monitors according to EETT Decision⁶⁸ and provided that certain technical terms and conditions are met. This specific regulation facilitates the users of the above applications. Additionally and when there is a high concentration of such systems in a specific space, EETT proceeds through licensing, to the definition of transmission requirements in order to avoid harmful interferences.

Finally, it is noted that during 2007, temporary Radiofrequency Rights of Use have been granted to radiocommunications stations in the framework of major athletic events (see sub-section 4.2.8.).

4.2.5. Radio-TV

Regarding radio-TV issues, EETT is responsible for granting the Radiofrequency Rights of Use for radio links, as well as for spectrum monitoring. In the latter case, EETT has the right to impose administrative sanctions on stations using illegal radio links.

Specifically for TV issues and according to Law 3548/ 2007⁶⁹, EETT has new responsibilities as far as the terms of installation and operation of TV stations are concerned. Specifically, EETT is from now on responsible for issuing Decisions regarding:

- I. The determination of the Broadcasting Centres for TV stations of national coverage –which have been granted an establishment and operation licence⁷⁰- in positions which were used up to the publication of the aforementioned Law and were not reported to

66. GSM Jammers.

67. Granting of Frequency Rights of Use for governmental networks is from now on done by MTC.

68. EETT Decision 399/34/16-08-2006 "Regulation on Terms of Use of Individual Frequencies or Frequency bands", GG Issue I456/B/03-10-2006.

69. Article 9, "Listing of governmental bodies' publication in the regional and local Press and other issues".

70. In accordance to article 4 of Law I866/1989.

the National Council for Radio and Television (NCRTV). The technical characteristics of the Broadcasting Centres are also defined.

With this specific action the entire Greek Territory will be fully and completely covered.

2. The relocation or the installation of new centres or different transmission locations of legally operating radio-TV stations of local and national coverage within the same **Frequency Map**, following an application submitted by those who are interested. The Decision will concern the total of the aforementioned stations included in each Frequency Map, in order for the geographical region to be fully and completely covered. All the above hold as long as the technical transmission characteristics of the residual legally operating TV stations of the neighboring Frequency Map are not affected.

Under this scope, EETT conducted a Public Consultation aiming at:

- Issuing a Regulation on the Granting of Channels Frequency Rights of Use to TV stations of national, local and regional coverage based on the aforementioned responsibilities.
- Publishing an Internet application for the granting of channels to TV stations of national coverage and the relocation of TV stations of local and regional coverage⁷¹.

The aforementioned Decisions will cease to be in force following the issue of a Joint Ministerial Decision (JMD) between the Minister of Transport and Communications and the Minister assigned with the responsibilities of Press and Media, regarding the configuration of a Frequency Map for analogue and/ or digital TV.

As far as the monitoring of TV and radio spectrum was concerned, the situation concerning Greek radio-TV landscape remained the same as in previous years, since the licensing of TV and radio stations and the subsequent organization of antenna parks are still pending.

This fact resulted in:

- A number of illegal emissions, both in urban centres and the Region, especially by non-licensed installations in Broadcasting Centres.
- Harmful interferences to air navigation services.
- Mutual interferences between TV and radio stations.
- Interferences to other services and spectrum uses.

EETT performs regular inspections and provides for the resolution of the interference problems aiming at terminating the illegal broadcasts.

Furthermore, EETT has repeatedly pointed out that, the licensing of radio and TV stations in Greece, as well as the organization and inspection of the infrastructure of those stations at Broadcasting Centres is required in order to safeguard the legal and efficient use of broadcasting spectrum, as well as the protection of the legally operating users from interferences.

Complaints

EETT received 1,134 complaints regarding interferences, illegal broadcasts and illegal radio-TV station installations. Those complaints related to:

- 480 radio stations outside Attica and 95 stations within the region of Attica.
- 203 TV stations outside Attica and 48 stations within the region of Attica.
- 61 antennas and Broadcasting Centres' inspections within the region of Attica and 41 outside Attica.

EETT proceeded to the investigation of the majority of the aforementioned complaints. The collaboration of the respective Prefecture Authorities was requested in areas remoted from the two EETT offices.

The findings of the technical audits for all the complaints related to the radio and TV stations that operated and were licensed legally, were forwarded to the NCRTV, as the competent NRA for the imposition of administrative sanctions, according to broadcasting regulation.

In the cases of the TV and radio stations that operated illegally according to NCRTV Decisions, EETT briefed in writing the respective Public Prosecutor and Police Authorities for the application of the anticipated penal procedures. At the same time and in collaboration with those authorities, EETT undertook a number of operations for terminating illegal transmissions during which the following were confiscated:

- 21 radio stations and 9 TV stations, 5 radio electric links, 1 UHF transmission and 2 wireless cameras within the region of Attica.
- 10 radio stations, 8 TV stations and 1 UHF transmission in the districts.

Recording of Radio and TV Stations over the Greek Territory

The imprint of the Broadcasting Centres and the frequencies used by radio and TV stations all over the Greek Territory constitutes –due to the lack of licensing– a significant tool for the management and monitoring of broadcasting spectrum.

71. http://www.eett.gr/opencms/sites/EETT/NewsReleases/Announcements/AnalogTV_Cons.html

In 2007, EETT's technical units performed recordings in 13 Prefectures over the Greek Territory, the results of which were forwarded to the NCRTV, which is the competent NRA for investigating the legal operation of radio-TV stations. Based on the findings of the recording, the total number of operating private radio stations per Prefecture is on average triple or in some cases quadruple, compared to the number of broadcasts specified in the Frequencies Maps. This resulted in an increased possibility of harmful interferences to legal users of the spectrum, as well as in a decreased quality of the provided service.

In addition to the aforementioned investigations, EETT carried on with the task of updating the imprint of radio-TV broadcasts installations in the Broadcasting Centres in the region of Attika and Thessalonica. The goal of this update was for EETT and all other competent bodies to be aware of the existing situation in the Broadcasting Centres of Attika and Thessalonica, in order to deal with the problem of harmful interferences directly and efficiently.

Furthermore, in the Imittos Broadcasting Centre and following the 2006 operation for imprinting the illegal installations, the Attika Prefecture in co-operation with the Pentelis Forest Inspection, the Athens Public Prosecutor's Office, the Police and EETT's technical units proceeded to the removal of all installed containers that did not belong to legally operating stations. At the same time, all illegal broadcasts have been terminated and all illegal active equipment located within the specific installations has been confiscated.

In the illegal Broadcasting Centres of radio and TV stations in the location "Pirovolia" of mount Egaleo and in several positions in Pikilo mount, EETT in collaboration with the Piraeus Prosecutor's Office and the Police proceeded to a series of repetitive inspections of the radio and TV installations. The aforementioned forces proceeded repeatedly to operations for terminating all illegal broadcasts, confiscating all illegal active equipment and dismantling the relevant antenna systems. At the same time, the Public Power Corporation (DEI) was informed about the findings of the inspections in order for the latter to proceed with cutting the power from any facility belonging to illegal users.

In the aftermath of a Decision taken by the Council of State and the co-operation of EETT with the local Authorities, all the necessary actions were made for the removal of all radio and TV installations operating under no antenna installation licence in Kamari position in Xilokastro.

Finally, in Thessalonica region, EETT continued the inspections aiming at imprinting the broadcasting positions of the radio and TV stations of Chortiatis Broadcasting Centre

precisely. The respective findings were forwarded to Thessalonica Police, as well as the co-responsible Authorities (Forest Inspection, Town Planning Department) in order for them to proceed with the necessary actions.

4.2.6. Air Navigation and Other State Services Networks

EETT's top priority is the unobstructed operation of wireless networks related to the protection of human life and public safety. Indicative examples of such networks are those of Civil Aviation Authority (CAA), Armed Forces, Hellenic Police (ELAS), Fire Department (FD) and EKAB.

During 2007 most of the problems related to the CAA networks (108 - 137 MHz) due to the adjacency with the FM radio broadcasts band (87.5 - 108 MHz). The large majority of interferences occurring in these networks is due to the lack of licensing and, consequently, to the lack of harmonization of radio stations all over the Territory. This fact results in obstructing the smooth operation of radio aids and CAA communications. There were also problems in the CAA telecommunications centres, due to their adjacency with the transmitters of radio-TV stations.

EETT monitors the air navigation spectrum all over the Greek Territory on a permanent basis, aiming at dealing with the above problems. Inspections were performed with the assistance of Fixed Monitoring Stations (FMS), which have been installed by EETT at Athens International Airport (AIA) and at the airports of Iraklio and Rhodes, as well as with the assistance of Mobile Monitoring Stations (MMS), mainly for the areas outside Attika and Thessalonica. The interference problems that CAA faces are expected to be limited only with the implementation of licensing the radio stations in the Territory and consequently, when land planning and antenna installations inspection regulations are imposed on the Broadcasting Centres.

In 2007 EETT received a total of 295 complaints, about interferences in the CAA telecommunications systems:

- 96 related to interferences in the flying aircraft communication receivers.
- 190 concerned the land communication receivers.
- 9 related to radio aids.

The total of the interference cases in the land communication receivers and the radio aids have been investigated and resolved. However complaints related to interferences in the flying aircraft communication receivers are as a



rule quite difficult to be investigated with the available terrestrial means.

As far as interferences in the state security and emergency networks were concerned, EETT received 9 complaints which have been investigated by priority and resolved accordingly.

4.2.7. Radio Amateurs

EETT received 17 complaints for interferences in the radio amateur communication systems. The majority of the problems investigated and resolved by EETT had to do with the illegal frequency use, as well as the interfering broadcasts of radio-TV stations and those from electrical or electronic apparatus (like ventilation systems).

4.2.8. Rights of Use for Athletic Events

In 2007 three major athletic events have been performed in Athens. EETT was responsible to cover all the needs related to the spectrum management and monitoring for the execution of these specific events.

European Champions League Final

EETT, in co-operation with the company responsible for the management of UEFA games, developed a management plan, which entailed the organization of a radiofrequencies' plan required for the coverage of the game by 31 Greek and foreign TV stations.

By the end of April, EETT had granted to all interested parties temporary Radiofrequency Rights of Use with the following distribution per service:

- 70 radiofrequencies for wireless microphones in 6 TV stations.
- 60 radiofrequencies for in-ear monitors.
- 32 radiofrequencies for portable satellite stations.
- 24 radiofrequencies for portable radio.
- 13 radiofrequencies for wireless cameras.
- 7 radiofrequencies for wireless cameras telecontrol.
- 1 radiofrequency for portable link.

Furthermore, EETT's technical units performed spectrum occupancy measurements in order to monitor the radiofrequencies assigned to the TV networks and prevent interference problems. On the 23rd of May 2007, namely the date of the final, 4 technical units monitored the area within the Olympic Stadium and the immediate surroundings. At the same time, 3 technical units were in alert, along with the Hellenic Police forces in the wider area of Attica.

European Basketball League Final

In April 2007 the European Basketball League Final took place in Athens. Temporary Radiofrequency Rights of Use were granted with the following distribution per service:

- 4 radiofrequencies for portable radio.
- 4 radiofrequencies for portable satellite stations.
- 2 radiofrequencies for in-ear monitors.

Marathon

EETT, in co-operation with the company responsible for the TV coverage of the Marathon and by means of an helicopter, proceeded in November 2007 to the temporary granting of Radiofrequency Rights of Use with the following distribution per service:

- 4 radiofrequencies for portable radio.
- 3 radiofrequencies to mobile stations (motorcycles).
- 2 radiofrequencies to air stations (CESNA airplane).
- 1 radiofrequency to air stations (helicopter).
- 1 radiofrequency to mobile stations (automobile).
- 4 radiofrequencies to portable links between fixed points.

In October 2007, EETT's technical units performed spectrum occupation measurements of the assigned radiofrequencies, not only in the helicopter's route but in the wider area and performed all the necessary actions to keep them clear from interferences. Furthermore at the date of the Marathon, a technical unit of EETT equipped with a direction finding unit was in full readiness for the immediate resolution of any interference problem.

4.3. Antenna Mast Constructions

4.3.1. Antenna Mast Constructions Licensing

During 2007, EETT received 1,102 new applications for antenna mast constructions licensing. Out of these cases, 113 were granted and 27 applications were rejected or revoked. The rest of the applications remained pending since they lack the Environmental Terms Approval (ETA). It should be noted that the application submission can take place without the submission of ETA, nevertheless it must be issued⁷² in order for the licensing procedure to be completed.

Furthermore and in accordance with the provisions of Law 3431/2006, the existing⁷³ antenna systems, should comply with the environmental provisions and the new

72 According to article 4 of EETT Antenna Mast Construction Licensing Regulation.

73. Following EETT or MTC Decisions.

radiation limits for the protection of the public within defined time-limits. Under this scope, the mobile operators submitted 586 related applications to EETT, 306 of them were issued, while 159 applications were rejected.

4.3.2. Illegal Installations of Mobile Telephony Antenna Constructions

In 2007, EETT received 1,023 complaints for mobile telephony antenna constructions. In the aftermath of a thorough investigation, it was ascertained that 703 cases concerned licensed antennas and the complaining parties/ applicants were informed about their legitimacy.

The remaining 320 complaints concerned non-licensed constructions. EETT's technical units performed in total 239 autopsies in mobile telephony base stations, 213 of which were performed within the region of Attica –40 of them were ex officio autopsies- and 26 outside the region of Attica. The Regional Office of Thessalonica performed 101 autopsies, while for 11 cases outside the region of Attica the autopsies have been performed by the competent Prefectures. In 198 cases of the above autopsies, administrative sanctions were imposed.

4.4. Ensuring Compliance of Radio and Telecommunications Terminal Equipment (RTTE)

4.4.1. Publication of Radio Interfaces

EETT with its respective Decisions approved the interfaces' drafts that specify the technical characteristics of:

- Radio equipment for mobile service use.
- Digital point to point radio systems operating in fixed service frequency zones (1,4 GHz - 55 GHz).

EETT forwarded the aforementioned drafts to the Hellenic Organization for Standardization (ELOT), which communicated the interfaces to the European Commission. Further to that, the drafts were placed under Public Consultation up till the 18th of February and the 7th of January 2008 respectively at the Commissions' website for the national regulations, according to the Directive 98/34/EC.

Additionally, the interface that defines the technical characteristics of Short Range Devices used for wireless access

systems, including local radio networks (WAS/ RLAN), operating in the frequency bands 5150 - 5250MHz, 5250 - 5350MHz, 5470 - 5725 MHz, 17.1 - 17.3 GHz was published.

4.4.2. Publication of Electronic Communications Operators' Radiofrequencies

In 2007, EETT continued the necessary examinations of the interfaces' content published by the Electronic Communications operators. In cases where omissions have been found, EETT has informed the responsible operators in order for them to publish the complete interfaces.

In this way, the manufactures are facilitated in designing and producing the equipment that can be connected to the operator's network and offer to the user of this equipment all the services provided by the respective interface.

4.4.3. Management of Radio Equipment Notifications⁷⁴

1,150 radio equipment notifications were submitted to EETT by manufacturers, importers or individuals responsible for placing the equipment on the Greek market. The management of the notifications includes the verification of the technical characteristics⁷⁵ of the radio equipment based on the National Frequency Allocation Tables (NFAT), the registration of the equipment's data in the data base managed by EETT and finally, the communication of the confirmation regarding the notification receipt to the enterprise that submitted the notification.

In December 2007, EETT participated in a pilot program for the operation of a central system for notification submission in the EU. This system is based on the One Stop Notification (OSN) application and has been implemented by the EU to facilitate the circulation of new equipment to the European market. Specifically, every interested party registers radio equipment data in a central data base maintained by the EU and at the same time, the responsible parties of every member state are notified by means of an e-mail. EETT will initiate the gradual implementation of the specific system and will accept notifications only through this application from April 2008 and onwards.

74. According to article 7 paragraph 3 of PD 44/2002, in cases of radio equipment using non-harmonized frequency bands in all EU member states, the radio equipment manufacturer, or his/ her authorized representative in the EU, or the responsible person for placing the equipment on the Greek market must notify EETT about his/ her intention to place the equipment on the market. The notification should be submitted at least 4 weeks prior to placing the equipment on the Greek market.

75. Operating frequency, maximum allowed power, adhered standards etc.



4.4.4. Market Surveillance

EETT performs regular inspections of RTTE market, in order to protect consumers from illegal equipment and prevent possible harmful interferences. In this framework, EETT monitors whether the equipment placed on the Greek market comply with the requirements set by law⁷⁶.

In 2007 EETT published an internal Circular, which lays down in detail the procedure for RTTE market surveil-

lance, based on the provisions of Law 3431/2006. Under this scope, EETT performed 20 inspections on the RTTE distribution stores and checked 28 equipment samples of different RTTE categories. In the majority of the cases, the administrative and technical inspection of the samples resulted to a non-compliance with the PD 44/2002 provisions. In all these cases and after the related Hearings, Recommendations or Fines were imposed respectively.

4.5. Controlling and Monitoring Actions of EETT

Subject	Number of Hearings	Fines	Recommendations	Exemptions	Other Sanctions/ Decisions
Mobile Telephony Antenna Mast Construction	101	190	-	10	1 Licence Revocation
Terminal Equipment	12	2	9	1	-
Radio-TV Stations	12	2	10	-	-
Private Mobile Radio Networks	3	1	2	-	-
Others	4	-	4	-	-
Total	132	95	25	11	

It is noted that the Decisions on Hearings held by EETT are subject to judicial control in accordance with the applicable Law.

76. PD 44/2002 "Radio Equipment and Telecommunications Terminal Equipment and the mutual recognition of their conformity. Transposition of the Greek legislation to the Directive 99/5/EC of the European Parliament and of the Council of 9 March 1999", GG Issue 44/A/07-03-2002.

4.6. Goals

The main strategic goals that EETT has set for the radio-frequency spectrum sector are twofold:

- Improvement of spectrum availability and facilitation of access.
- Provision of information and support the creation of advanced infrastructures in wireless networks.

For the implementation of the aforementioned goals, EETT actions in 2008 will focus on the following:

- Provision of additional spectrum, according to the needs of the market for the creation of advanced networks.
- Safeguarding the sound and legitimate use of spectrum via mechanisms of efficient monitoring and management.
- Simplification of the administrative licensing procedures aiming at promoting investments.
- Prompt update of the market on spectrum availability and access procedures.





05 Postal Services Sector



During 2007, a significant number of new Postal Services providers started to operate in the market. Specifically, EETT received 85 registration applications for the Postal Registry, among which 78 were accepted and 7 were rejected. At the end of the year, EETT's Postal Registry recorded 377 Postal Services providers under General Authorization and 5 under Individual Licences.

EETT proceeded with its supervisory work, conducting investigations of Postal Services providers, in order to ensure their compliance degree with the current legislative framework. Towards the same direction, it investigated complaints filed by consumers and it took the appropriate measures in case of infringements, in order to ensure their interests.

Furthermore, EETT conducted a comparative study regarding the characteristics of the Greek and the European Postal Services markets in collaboration with an independent agency. Also, it continued recording the developments and trends of the Greek market. At the same time, it participated actively in the European consultation for the future of the postal market, in view of the new Postal Directive.

Finally, it worked with the Universal Service Provider (USP) for the implementation and development of a new cost accounting system.

5.1. Postal Services Market - EETT

5.1.1. Liberalization Process

In Greece, as in most of the member states of the European Union (EU), the Postal Services market operates for the last six years under a gradual liberalization regime, according to the relative European Directives. As of 1st January 2006, Hellenic Post (ELTA) which is the USP, retain the exclusivity in the A' Priority Domestic Mail which entails items that weigh under 50 gr. This maximum weight limit does not hold if the price is 2.5 times equal or bigger than the fee paid for a 20 gr. letter mail of A' Priority Domestic Mail.

In the context of the Codification Process, the European Parliament and Council jointly transferred the deadline of the full Postal Services market liberalization to 31st of December 2010, namely, two years later than the European Commission's Recommendation. As far as the new member states are concerned, as well as Greece and Luxembourg, the deadline can be prolonged up to the 31st of December 2012. It is noted that three of the new member states, Bulgaria, Estonia and Slovenia, decided not to make use of the above special provision and to proceed with the liberalization of their markets at the same date as the old member states.

In the beginning of 2008, the new Postal Directive is expected to be published setting the rules and ensuring the smooth transition to the single and fully liberalized Postal Services market.

The Postal Directive aims at creating a single internal Postal Services market, via the removal of the exclusive rights and privileges in the Universal Service (US) area (removal of reserved area). Particularly, the Directive:

- Determines the timetable for the full liberalization of the market.
- Foresees a common level of US provision in all EU member states. Specifically, it sets common rules regarding the:
 - ▶ Safeguarding the US Provision in the EU.
 - ▶ Financing the US –if necessary- under those terms that guarantee the permanent provision of that service.
 - ▶ Pricing principles and the accounts transparency of the US.
 - ▶ Quality specifications for the US provision.
 - ▶ Creating of a system that will ensure the compliance with all the aforementioned issues.
- Determines the terms for the provision of Postal Services.

Figure 4
Postal and Postal-Related Services

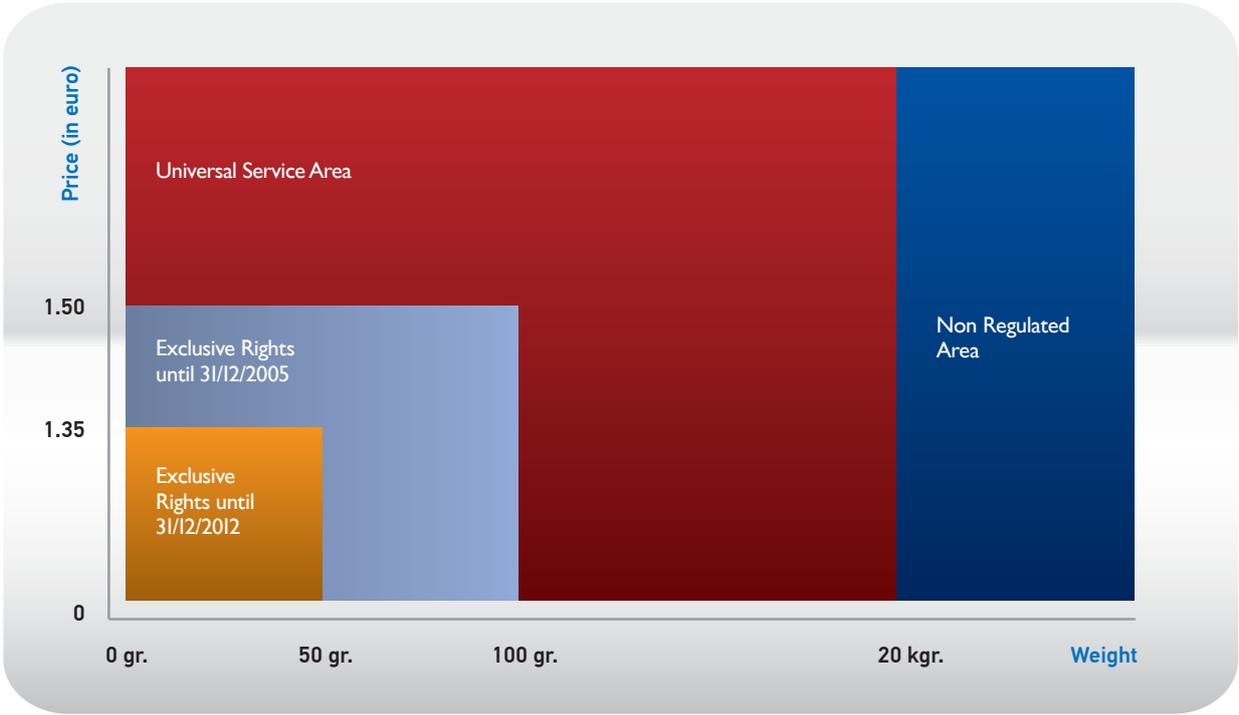
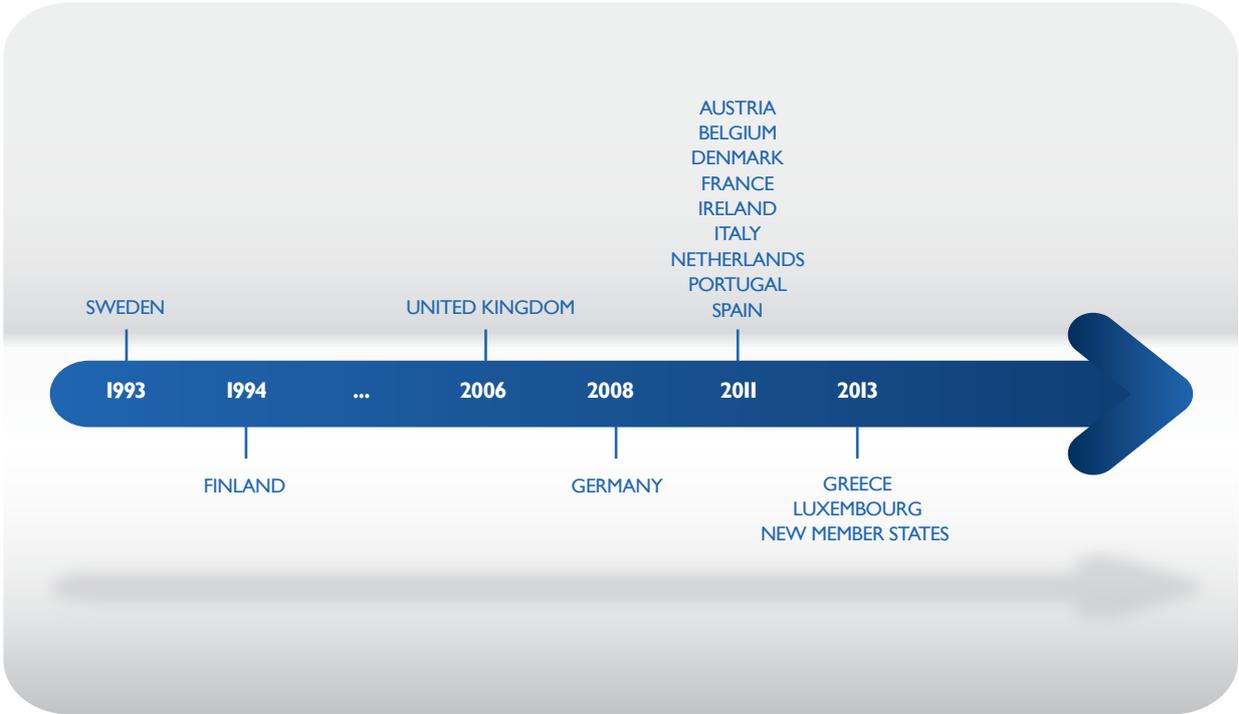


Figure 5
EU Postal Liberalization Progress



- Sets the rules for the harmonisation of the technical specifications.
- Strengthens the regulatory and monitoring role of the National Regulatory Authorities (NRAs).

Specifically, the NRAs should be endowed with the necessary resources – personnel, specialization and financial means – in order to have the ability to fulfil their mission, as far as the compliance with the Directive’s obligations and the competition rules in the Postal Services sector is concerned.

Full liberalization will complete a long reforming process that targeted the markets’ opening and the effective operation of the Postal Services providers in a competitive environment. Additionally, it is expected to contribute significantly to the further growth and improvement of the providing services. At the same time, the USPs, in light of the competition from the new market entrants, will be motivated to provide more competitive services and better customer care to consumers.

Finally, it is estimated that new jobs will be created in the Postal Services market, as well as in the postal-related sectors.

5.1.2. Developments in the Greek and International Postal Services Market

EETT is also responsible for collecting data and monitoring the trends of the Greek and international Postal Services market. In November of 2007, EETT presented the “Study of the Greek Postal Services Market for 2006”, aiming at informing the Postal Services providers about the market course and trends. This study provides a spherical view of the growth perspectives, as well as of the market size e.g. volumes, revenues and postal infrastructures.

According to that particular study, the Courier Services market, which constitutes the liberalized part of the sector, is growing rapidly compared to the US which advances at a slower pace. Additionally, the number of postal items per capita is substantially low. Approximately 60 items per capita are handled in Greece, while the European average is three-times bigger and exceeds 200 postal items per capita. Consequently, the growth margins for the USP and the Courier Services providers are significant.

Furthermore, EETT conducted a qualitative study regarding the characteristics of the Greek and the European Postal Services markets in collaboration with an independent agency. The study focused on the following issues:

- The main qualitative and quantitative characteristics of the Greek Postal Services market for 2005 and 2006 (market growth, competition level, supply and demand issues etc.).
- The main characteristics of the European developed Postal Services markets (market structure, competition level, US characteristics, access to the Public Postal Network).
- The main socio-economic and qualitative characteristics that should mark the US, in a fully competitive and liberalized market.
- The amendment of the regulatory framework for granting General Authorizations and Individual Licences (service indexation, market growth and competition etc.).

The above mentioned study along with the experience gained so far, will constitute useful tools for the revision of the regulatory framework for General Authorizations and Individual Licences, as well as for the submission of relative Proposals to the Ministry of Transport and Communications (MTC). The resulting new Regulations will be put under Public Consultation prior to their implementation in order to achieve transparency and consensus.

Also, the new regulatory framework will take into consideration the current trend that characterizes the international and gradually, the Greek market regarding the bundling of services relating to Transports, Courier Services and Logistics⁷⁷. It is noted that the co-operation between the above 3 sectors can operate effectively via efficient communication and distribution channels. Moreover, the geography of Greece should be utilized appropriately in order to render the country as the focal point of parcel distribution.

5.1.3. Information Actions

During the first quarter of 2007, EETT conducted a series of information seminars on "Postal Services: Legal Framework Implementation - Licensing" in Athens, Thessalonica and Patras, aiming at:

- Recording the Postal Services sector’s needs in Greece.
- Informing about the appropriate implementation of the current regulatory framework, in order to safeguard the proper operation of the Postal Services market.
- Establishing an effective communication channel among EETT and the Postal Services market.
- Informing adequately about Postal Services market issues, targeting at the improvement of the providing services.

77. One stop shop.



Among the participants were Postal Services providers, under General Authorization or Individual Licence, representatives of chambers, public financial services and other related public or private agencies, as well as Postal Services users.

It is noted that, according to EETT's relative studies, the Western Greece and Ionian Islands Regions possess the third place in terms of postal items volume. These Regions are expected to play a significant role in the broader geographical area and to constitute the national, business and socio-economic gate of Greece to West.

Finally, these information actions demonstrated that the common objective of the Regulator, the Postal Services market and consumers is the provision of quality Postal Services, in affordable prices, within an environment of sound competition.

5.2. Universal Service

The US ensures the provision of a basic level of Postal Services to all citizens. As it was mentioned before, the provision of US in Greece has been assigned to ELTA rendering it as the USP. At the US context and excluding the exclu-

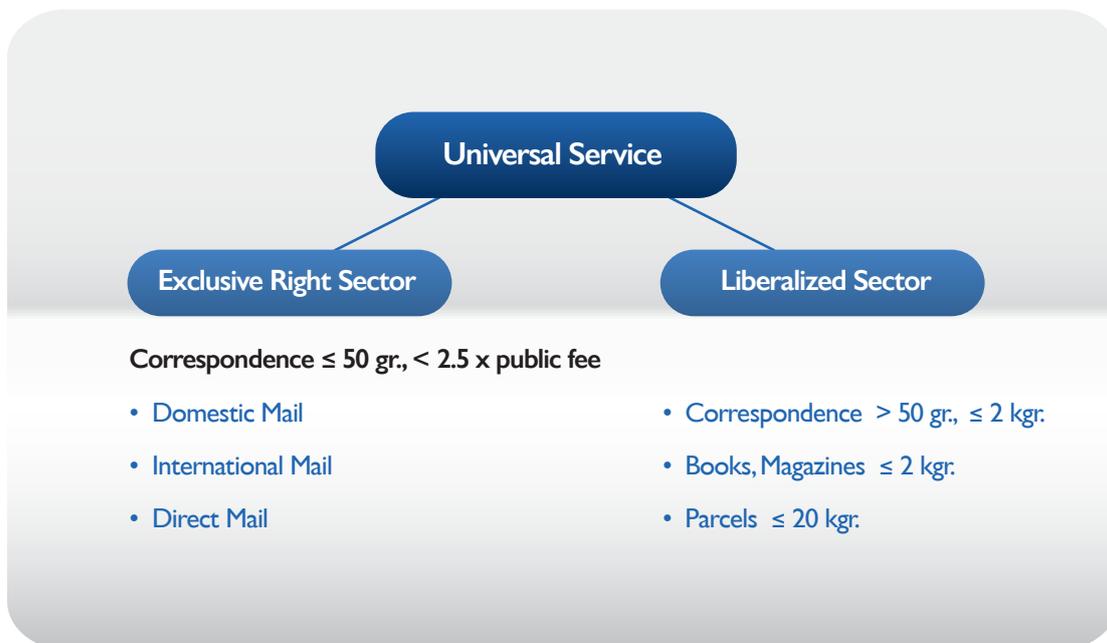
sive rights sector (see Chart I), alternative providers can also operate provided that they possess an Individual Licence from EETT.

The provision of an efficient and high quality US constitutes a fundamental objective for each modern competitive economy. In this context, EETT delegated the process of the quality measurement results made by the USP to an independent agency. The processing of the results was conducted according to Standard EN 13850:02 aiming at monitoring the speed and the delivery reliability for the distribution of A' Priority Domestic Mail. Specifically, the following indicators were monitored:

- The speed indicator (H+1), which is defined as the percentage of valid test letters that is being handled from the deposit point to the delivery point within 1 business day from the deposit day.
- The reliability indicator (H+3), which is defined as the percentage of valid test letters that is being handled from the deposit point to the delivery point within 3 business days from the deposit day.

The Ministerial Decision (MD) 28977/811/21-06-2006 sets the annual objectives for these two indicators that should be achieved by the USP for the three-year period 2006-2008.

Chart I
Universal Service Distinction



The following Table presents the quality measurements regarding the A' Priority Domestic Mail for the period 2002 - 2007.

Table 8
Results of Quality Measurement of A' Priority Domestic Mail

Year	Semester	USP's Obligation according to MD		USP's Results based on Measurement		
		Speed Indicator (H+1) (%)	Reliability Indicator (H+3) (%)	Speed Indicator (H+1) (%)	Reliability Indicator (H+3) (%)	Average Duration of Delivery (Days)
2002	1 st Semester	77	90	48.61	90.86	1.91
	2 nd Semester			46.92	89.01	1.98
2003	1 st Semester	82	93	58.79	94.87	1.61
	2 nd Semester			66.95	96.78	1.44
2004	1 st Semester	85	95	66.06	95.60	1.49
	2 nd Semester			65.58	93.38	1.60
2005	1 st Semester	85	99	69.10	94.50	1.46
	2 nd Semester			72.40	96.10	1.34
2006		85	98	77.7	97.3	1.15
2007		86	98	78.9	97.8	1.18

It is evident from the above Table, that in 2007 the speed indicator kept on improving though not reaching the desired target (78.9% in 2007 versus 77.7% in 2006). At the same time, the reliability indicator approached the desired target, namely the majority of the A' Priority Domestic Mail is being handled within 3 days to its destination at a 98% approximately.

The quality measurements of Incoming/ Outgoing International Mail of A' Priority are made by the International Postal Corporation (IPC). The UNEX system records the distribution time of A' Priority International Mail from the deposit time until the delivery time. In this case, the speed indicator is defined as the percentage of the valid letters that are being handled within 3 days from the deposit

country to the delivery country. Accordingly, the reliability indicator is defined as the percentage of the valid letters that is being handled within 5 days from the deposit country to the delivery country. The target values for the above indicators are set in the MD 28977/8III/ 21-06-2006.

The measurements' results for the Outgoing A' Priority International Mail for the period 2005 - 2007 are presented in Table 9. The data shows an explicit improvement of the provided services' quality during the period 2006 - 2007. The target value for the speed indicator was achieved by the majority of the countries (21 in 28) participated in the IPC measurements. Respectively, 20 out of the 28 countries achieved the target value for the reliability indicator.



Table 9
Quality Measurements of International Outgoing Mail

Country	2005		2006		2007	
	Speed Indicator (H+3) (%)*	Reliability Indicator (H+5) (%)*	Speed Indicator (H+3) (%)*	Reliability Indicator (H+5) (%)*	Speed Indicator (H+3) (%)*	Reliability Indicator (H+5) (%)*
AUSTRIA	86.5 (85.0)	97.5 (99.0)	93.0 (85.0)	98.3 (97.0)	90.8 (85.0)	99.1 (97.0)
BELGIUM	90.7 (85.0)	98.4 (99.0)	93.6 (85.0)	98.2 (97.0)	92.1 (85.0)	98.6 (97.0)
CYPRUS	69.2 (85.0)	91.6 (99.0)	79.6 (85.0)	95.1 (97.0)	82.1 (85.0)	94.2 (97.0)
CZECH REPUBLIC	81.0 (85.0)	93.7 (99.0)	86.1 (85.0)	100 (97.0)	90.2 (85.0)	98.0 (97.0)
DENMARK	84.9 (85.0)	98.1 (99.0)	88.5 (85.0)	97.2 (97.0)	85.6 (85.0)	97.9 (97.0)
ESTONIA			76.9 (80.0)	100 (95.0)	86.4 (80.0)	94.9 (95.0)
FINLAND	83.5 (80.0)	96.3 (95.0)	81.3 (80.0)	97.2 (95.0)	85.9 (80.0)	98.5 (95.0)
FRANCE	87.3 (85.0)	97.2 (99.0)	91.5 (85.0)	98.3 (97.0)	92.6 (85.0)	98.9 (97.0)
GERMANY	89.6 (85.0)	97.8 (99.0)	95.5 (85.0)	99.4 (97.0)	96.1 (85.0)	99.7 (97.0)
HUNGARY	80.9 (85.0)	95.7 (99.0)	85.0 (85.0)	97.3 (97.0)	87.5 (85.0)	99.7 (97.0)
ICELAND	69.2 (80.0)	92.3 (95.0)	71.7 (80.0)	94.6 (95.0)	72.4 (80.0)	96.9 (95.0)
IRELAND	78.5 (80.0)	96.2 (95.0)	81.1 (80.0)	96.7 (95.0)	90.1 (80.0)	98.4 (95.0)
ITALY	84.8 (85.0)	95.5 (99.0)	92.6 (85.0)	98.9 (97.0)	89.8 (85.0)	98.3 (97.0)
LATVIA			79.2 (80.0)	91.7 (95.0)	79.6 (80.0)	98.0 (95.0)
LITHUANIA			73.3 (80.0)	83.3 (95.0)	73.2 (80.0)	92.9 (95.0)
LUXEMBOURG	87.7 (85.0)	97.9 (99.0)	90.0 (85.0)	98.3 (97.0)	90.4 (85.0)	97.2 (97.0)
MALTA	63.1 (80.0)	87.7 (95.0)	80.9 (80.0)	93.6 (95.0)	83.6 (80.0)	98.5 (95.0)
NETHERLANDS	90.3 (85.0)	98.0 (99.0)	92.8 (85.0)	98.9 (97.0)	91.5 (85.0)	98.5 (97.0)
NORWAY	89.8 (80.0)	96.2 (95.0)	87.7 (80.0)	97.5 (95.0)	80.3 (80.0)	96.8 (95.0)
POLAND	84.7 (85.0)	94.9 (99.0)	85.2 (85.0)	99.1 (97.0)	76.0 (85.0)	92.5 (97.0)
PORTUGAL	81.8 (80.0)	96.7 (95.0)	82.4 (80.0)	97.4 (95.0)	85.6 (80.0)	97.1 (95.0)
ROMANIA	60.5 (85.0)	92.1 (99.0)	74.0 (85.0)	94.9 (97.0)	76.9 (85.0)	93.1 (97.0)
SLOVAKIA	50.8 (80.0)	89.2 (95.0)	83.2 (80.0)	95.6 (95.0)	80.5 (80.0)	96.1 (95.0)
SLOVENIA	51.9 (80.0)	86.5 (95.0)	78.8 (80.0)	98.2 (95.0)	71.2 (80.0)	90.4 (95.0)
SPAIN	82.8 (85.0)	95.9 (99.0)	87.3 (85.0)	96.6 (97.0)	86.7 (85.0)	96.9 (97.0)
SWEDEN	89.0 (85.0)	98.0 (99.0)	91.0 (85.0)	97.7 (97.0)	90.3 (85.0)	99.0 (97.0)
SWITZERLAND	92.7 (85.0)	98.3 (99.0)	94.6 (85.0)	99.4 (97.0)	96.2 (85.0)	99.2 (97.0)
UN. KINGDOM	78.6 (85.0)	94.5 (99.0)	87.4 (85.0)	96.6 (97.0)	85.7 (85.0)	96.3 (97.0)

* Target value according to Ministerial Decision.
H= Business Day of Deposit

Table 10
Quality Measurements of International Incoming Mail

Country	2005		2006		2007	
	Speed Indicator (H+3) (%)*	Reliability Indicator (H+5) (%)*	Speed Indicator (H+3) (%)*	Reliability Indicator (H+5) (%)*	Speed Indicator (H+3) (%)*	Reliability Indicator (H+5) (%)*
AUSTRIA	85.5 (85.0)	97.0 (99.0)	86.8 (85.0)	97.5 (97.0)	90.4 (85.0)	98.3 (97.0)
BELGIUM	86.1 (85.0)	97.0 (99.0)	88.4 (85.0)	97.8 (97.0)	90.7 (85.0)	98.6 (97.0)
CYPRUS	80.7 (85.0)	96.3 (99.0)	82.0 (85.0)	96.1 (97.0)	88.9 (85.0)	98.7 (97.0)
CZECH REPUBLIC	59.6 (85.0)	93.2 (99.0)	62.3 (85.0)	93.6 (97.0)	81.4 (85.0)	97.5 (97.0)
DENMARK	82.0 (85.0)	92.9 (99.0)	83.7 (85.0)	97.4 (97.0)	88.7 (85.0)	97.9 (97.0)
ESTONIA					78.9 (80.0)	96.5 (95.0)
FINLAND	81.3 (80.0)	95.5 (95.0)	83.4 (80.0)	96.8 (95.0)	84.8 (80.0)	97.7 (95.0)
FRANCE	80.6 (85.0)	96.2 (99.0)	80.3 (85.0)	96.0 (97.0)	88.2 (85.0)	97.8 (97.0)
GERMANY	87.0 (85.0)	97.3 (99.0)	85.6 (85.0)	97.7 (97.0)	85.1 (85.0)	98.5 (97.0)
HUNGARY					81.8 (85.0)	95.7 (97.0)
ICELAND	63.9 (80.0)	92.2 (95.0)	54.6 (80.0)	88.8 (95.0)	67.0 (80.0)	97.2 (95.0)
IRELAND	47.1 (80.0)	84.3 (95.0)	61.3 (80.0)	92.7 (95.0)	77.8 (80.0)	96.8 (95.0)
ITALY	82.0 (85.0)	95.4 (99.0)	84.8 (85.0)	97.0 (97.0)	87.3 (85.0)	96.8 (97.0)
LATVIA					61.4 (80.0)	91.2 (95.0)
LITHUANIA					67.1 (80.0)	94.7 (95.0)
LUXEMBOURG	85.8 (85.0)	95.9 (99.0)	84.9 (85.0)	97.5 (97.0)	90.3 (85.0)	98.1 (97.0)
NETHERLANDS	85.0 (85.0)	96.8 (99.0)	88.9 (85.0)	97.8 (97.0)	87.2 (85.0)	97.2 (97.0)
NORWAY	81.3 (80.0)	96.3 (95.0)	78.8 (80.0)	93.8 (95.0)	81.7 (80.0)	97.0 (95.0)
POLAND					70.0 (85.0)	98.2 (97.0)
PORTUGAL	59.5 (80.0)	89.5 (95.0)	64.8 (80.0)	94.0 (95.0)	72.0 (80.0)	95.8 (95.0)
ROMANIA	39.1 (85.0)	82.8 (99.0)	56.4 (85.0)	87.8 (97.0)	71.2 (85.0)	92.7 (97.0)
SLOVAKIA					60.0 (80.0)	93.8 (95.0)
SLOVENIA					75.0 (80.0)	96.6 (95.0)
SPAIN	72.7 (85.0)	96.1 (99.0)	76.4 (85.0)	95.9 (97.0)	82.2 (85.0)	97.0 (97.0)
SWEDEN	80.1 (85.0)	94.5 (99.0)	81.2 (85.0)	94.9 (97.0)	87.2 (85.0)	97.6 (97.0)
SWITZERLAND	87.0 (85.0)	97.7 (99.0)	86.6 (85.0)	96.2 (97.0)	92.2 (85.0)	98.4 (97.0)
UN. KINGDOM	73.9 (85.0)	95.7 (99.0)	81.5 (85.0)	96.3 (97.0)	85.2 (85.0)	97.4 (97.0)

* Target value according to Ministerial Decision.
H= Business Day of Deposit

The corresponding results for the A' Priority International Incoming Mail are displayed in Table 10. The conclusions regarding the speed indicator are not similar to those of the International Outgoing Mail. Specifically, 18 out of 20 countries (for which available data exist for 2005) improved their measurements, while the rest of them performed poorly in terms of quality. The target value was barely reached by 14 out of 27 countries and, consequently, it is estimated that there is room for improvement. On the contrary, the reliability indicator for 2007 improved for the majority of EU countries. The target value was achieved by 21 countries, while for 4 out of the residual 6, the indicator was slightly under the target value.

During the second semester of 2007, EETT worked with the USP for the design and the implementation of a new cost accounting system. This particular action aims at adopting a more flexible, transparent and reliable cost accounting context on the one hand and upgrading the cost accounting structure of the US services on the other hand. The new system is expected to be in full operation during 2008 and it is estimated that it will maximize the benefits, as far as the equal treatment of Postal Services users and the qualitative upgrade of the provided services are concerned.

Also, EETT, in the context of examining the cost accounting data submitted by the USP prior to the implementation of its new invoices for 2007, appreciated that the US cost is not efficient. For this reason, the USP implemented new invoices with smaller increases.

5.3. Developments in the International Postal Services Market

5.3.1. The Progress of European Postal Services Sector

Direct mail constitutes the most common category of postal products in the European level. This particular category is characterized by high volumes of postal items, a fact that denotes its capabilities and the prospects of competition strengthening within it.

The United Kingdom (UK), Germany, France and Netherlands compose the most important European Postal Services markets, in terms of volumes and revenues. Compared to Greece, these markets present higher growth in terms of volume and revenues. Indicatively, it is reported that the volume of postal items in Greece make up for 9.3% of the respective of Netherlands, which is the smaller of the above four markets.

As far as the Public Postal Network (PPN) of the above Postal Services markets is concerned, it is of great interest that the PPN of the four countries have reorganized their postal offices, as well as their provided services. The maintenance cost of postal offices has led the European USPs to come up with more flexible solutions regarding the US provision (smaller postal units, agencies, franchising and mobile postal units).

The development of a national Postal Services network is an emerging trend, namely the utilization of the USP network, with a simultaneous possibility access for the alternative providers to every point of the production chain (from the collection up to the delivery). The provided services and products are also enriched through their bundling with either some financial products or the retail supply of consumer goods. At the same time, advertising and promotion of the postal offices are triggered by the large numbers of Postal Services users that visit them, a fact that significantly contributes to the reduction of their maintenance cost. The utilization procedure of PPNs aims at offsetting the accruals of their maintenance cost.

At the same time there are also some other benefits. For example, in the UK, the competitive pricing and the simplified access procedures have rendered the PPNs accessible to the alternative providers resulting to the further strengthening of their competitiveness in terms of designing, printing, sorting and managing the customers' database (postal preparation services). The full market liberalization enabled the Postal Services providers with the opportunity to examine their potential in expanding their operations to distribution, via their licensing or the free PPN access.

For the time being, it is a common place that each member state follows a different approach regarding the full liberalization of Postal Services market mainly on the following issues:

- Licensing Regime.
- Access to PPN.
- Extent of the US.
- Cost and Pricing policies.

Generally speaking and in view of the full liberalization of European Postal Services markets, the major European Postal Services providers are planning ahead in order to meet the new emerging circumstances. The global Postal Service providers are taking a strong interest for the European markets and particularly, for those markets that present similarities, such as those of Central Europe. Mergers and acquisitions, which have already appeared in the Greek Postal Services market, are becoming more

frequent and intense throughout the EU. The new entrants are gradually consolidating their position, while the USPs are reforming their strategies, in order to maintain and increase their market shares.

5.3.2. The Importance of New Technologies for Market Growth

The continuous technological evolution is estimated to reshape the Postal Services sector. The main issues that concern the market participants are the prospect of either a mass substitution of Postal Services by Electronic Communications or the parallel common growth of them.

According to recent studies, it is estimated that the substitution by Electronic Communications will induce a rapid fall of the postal items volume. The main points of these studies are the following:

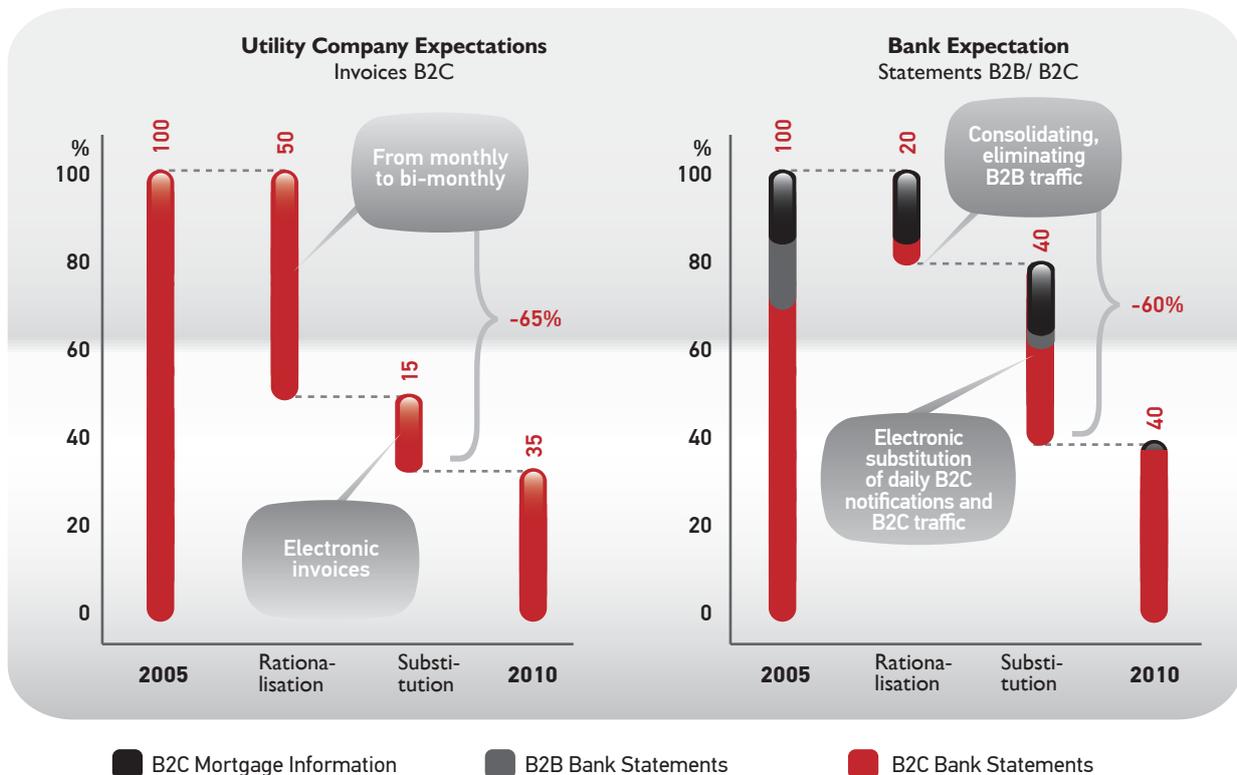
- The enormous increase of the electronic means of communication.

- The forthcoming penetration of households' broadband connections.
- The Internet advertisement and promotion.
- The Internet based applications, such as e-billing, e-banking, e-government, e-commerce.

During the last years the letter post volume has notably decreased, mainly due to the extensive use of e-mails and other services of information communication technology, a progress that is expected to intensify over the following years. Furthermore, it is estimated that the postal items, mainly dispatched by the private and banking sector, will further decrease due to the cost restriction and electronic substitution (see Figure 6).

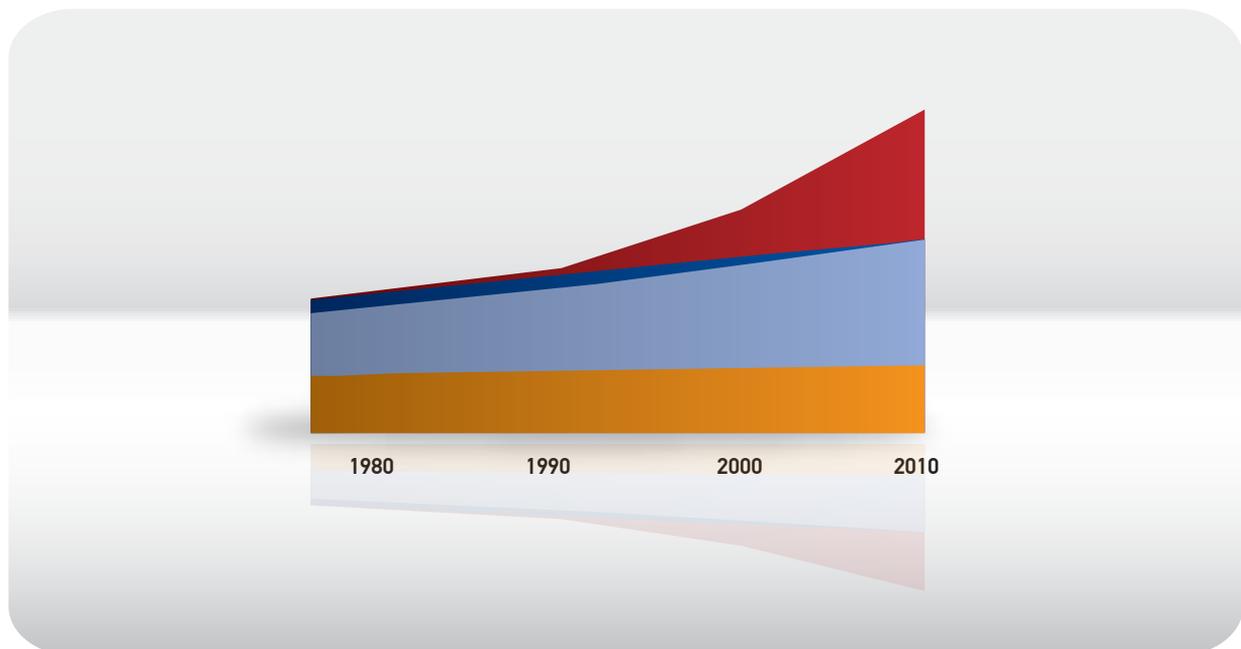
It is also noted, that the postal items volume dispatched by consumers (C2B and C2C) has considerably decreased, while the B2B services (Business to Business) and B2C (Business to Consumer) occupy more than the 85% of the total volume.

Figure 6
Letter Post Substitution



Source: InFinancials, Annual Report, BCG Analysis, BCG Report "European Postal Landscape 2015"

Figure 7
Development of Communication Means



■ Mail
 ■ Telecom
 ■ Fax
 ■ E-mail

Source: TNT

The estimation for the future development of communication means in Europe is presented in Figure 7. Postal Services depict certain stagnation compared to Electronic Communications that increase rapidly.

On the other hand, there is evidence showing convergence between the Postal and the Electronic Communications Services that can be achieved by developing the new technological possibilities. The main points that are in favour of this specific approach are the following:

- The volume of postal items remains stable and in certain services –as the Direct Mail- rises despite the significant increase of e-mails.
- The personal mail correspondence is not expected to further decrease, since it has already been substituted by mobile and fixed telephony, SMS and e-mails.
- The Internet users, mainly those who have broadband connections, receive a large number of postal items, according to data from the American and the UK market.
- The postal items related to utility and bank correspondence composes a valuable marketing tool. Moreover;

there is evidence that the use of new technologies encourages, facilitates and adds value to Postal Services. The followings are cited indicatively:

- ▶ E-shops and mobile telephony services use extensively the postal and postal related services, in order to meet up the growing need for transactions.
- ▶ The users upload in relative websites their digital photos or other personal digital data (cards, books) and receive their printed version via mail.
- ▶ Companies dispatch, via mail, marketing and advertising material in digital form (CD, DVD) to their customers.

Consequently, the conclusion that can be reached is that the future of the Postal Services sector will depend considerably on the degree that it will adapt to the new environment formed by the rapid increase of Electronic Communications on the one hand and the implementation of the new technologies as a tool for their further growth on the other hand.

5.4. Regulating and Monitoring Role of EETT

During 2007, EETT conducted 21 scheduled and 16 unscheduled audits in Postal Services providers, in order to investigate possible misdemeanours and exercise of illegal activities at providing Postal Services. The audits resulted in many cases of infringing upon the terms of the licensing granting and consequently, EETT undertook the necessary measures to bring those providers to heel.

It is evident from Table II that the most important problem was the insufficient registration or absence of data in their Special Postal Items Track and Trace System (SPITTS).

It is noted that the supervision actions of 2007 were repressive and preventive. In view of the above and in order to ensure the legal operation of Postal Services, EETT collaborated with the public financial services and the Commercial Chambers, aiming at informing the potential providers about the legislative framework of Postal Services provision.

The ultimate goal of EETT was to minimize the infringing conducts on the one hand and to create a healthy and competitive environment for the operation of Postal Services providers on the other hand, promoting sound entrepreneurship, investments, competitiveness and innovation.

Table II
Results of Scheduled Audits, 2007

Type of Problem	Percentage
Insufficient registration or absence of data in Special Postal Items Track and Trace System (SPITTS)	67%
Insufficient completion of Express Delivery Voucher (EDV)	43%
Improper fees' payment	27%
Non-observance of the Charter of Obligations to Consumer (COC)	10%
None ascertained infringement	5%

Table I2
Results of Unscheduled Audits, 2007

Conclusions	Percentage
None ascertained infringement	73%
Ascertainment of interruption of business activity	18%
Provision of services beyond EETT's responsibilities	9%

Table I3
Results on EETT Hearings, 2007

	Number
Number of Hearings*	67
Recommendations	36
Licence Recalls	11
Exemptions	9
Archive	5
Fines	3
Fee's Recalculation	1
Other Sanctions/ Decisions (Further Study)	2
<p>* Note 1: Hearings that took place and were completed in 2007. Note 2: The Decisions on Hearings held by EETT are subject to judicial control in accordance with the applicable law.</p>	

5.5. Goals

EETT has set the following goals for 2008, as far as the Postal Services sector is concerned:

- Conducting a Public Consultation on the proposed amendments of the Regulation on General Authorizations and Individual Licences, according to the conclusions of the comparative Study on Greek and European Postal Services market.
- Issuing and implementing the new Regulations on General Authorizations and Individual Licences.
- Intensifying all information actions of the market and the consumers.
- Creating electronic infrastructure for the primary data collection of the Greek Postal Services sector.
- Eliminating the illegal activity in the sector and co-operating in a permanent basis with all the respective agencies and institutions, in order for the latter to contribute to EETT supervisory work.
- Identifying the parameters that need to be improved in the implementation of the USP new cost accounting system.





06 European and International Collaborations



The developments at the European and international level influence and often determine the activity in the Electronic Communications and Postal Services markets. The National Regulatory Authorities (NRAs) are the competent organizations that play an important role in the shaping of the regulatory environment, update the markets with regard to current developments and actions and transfer know-how.

In this dynamic and constantly changing environment, EETT is in close co-operation with the other NRAs, the European Commission and other international organizations. At the same time, it represents Greece by promoting its positions on relevant issues and participates in the development process. Lastly, it stays updated with issues of its competence and promotes its work at European and international level.

6.I. European Union

6.I.1. European Regulators Group (ERG)

In 2007, EETT participated actively in the work of the [ERG](#) Group. The main focus areas of the ERG work program were the following:

- The review of the European Regulatory Framework for the Electronic Communications that had started in 2005.
- The current developments in technologies and markets.
- The harmonization of the regulatory measures implemented in the member states.

The ERG proceeded to further analyses of the developing markets and technologies, so that it can correspond to the needs of the constantly changing environment of the Electronic Communications in Europe. Primarily, emphasis was laid on issues, such as broadband, Roaming on wireless communications networks for voice services, [VoIP](#) and Next Generation Access (NGA) networks.

In October 2007, EETT hosted in Athens the Plenary Meeting of the 25 ERG Presidents. Some of the most important issues that were discussed were the review of the above mentioned Regulatory Framework, the common strategy of the European NRAs in crucial issues (NGA, wholesale broadband access, fixed and mobile termination rates, convergence of services) and the proposal for the creation of the European Electronic Communications Market Authority (EECMA).

6.I.2. Comité Européen de Réglementation Postale (CERP)

The two biannual [CERP](#) Plenaries took place in May and December of 2007, with the participation of representatives from the member states. CERP is the special Committee, which is responsible for issues relating to Postal Services at a European level and consists of the 48 member states that also take part in the [European Conference of Postal and Telecommunications Administrations \(CEPT\)](#). The states in question are either members of the European Union (EU) or accession states, or maintain a special relation with the EU.

In view of the issue of the new Postal Directive for the full liberalization of the Postal Services market, combined with the recent expansion of the EU, which now numbers 27 member states, four were the main issues that were discussed during the two Plenary Meetings, which were both attended by EETT:

- The [Universal Service \(US\)](#) and the Market Development: namely, the possibility to ensure and further improve the US quality, through the application of best regulatory practices, as well as to enhance the perspectives of development of the Postal Services market.
- The role and jurisdiction of the international organizations of the European Commission: the workings focused on the jurisdiction of the CERP and the Postal Directive Committee (PDC), which allow for the co-operation among NRAs at the EU level.



Specifically, the PDC assists the European Commission in implementing the Postal Directive, collecting the data concerning the development of the market, taking the measures for the development of the internal market of the EU Postal Services and improving the quality of services. The CERP promotes the European views in the Universal Postal Union (UPU) and formulates Proposals, Recommendations and Directives.

- The operational effectiveness of the International Post and the quality of service of the major users: in this context, there was an examination of the problems that the major users of Postal Services face, due to the variance that exists among the member states in the way the recipient's address is written and in the packaging. In order to solve these problems, providers need to implement standardized procedures and adopt a customer-based philosophy. Another issue that was discussed was the possibility to have access to an address database and to information concerning the change of addresses, mostly at international level, aiming at improving the effectiveness of the Postal Services and dealing with environmental issues (e.g. reducing the loss of packages, reducing the use of paper).
- The liberalization of the Postal Services sector: considerations were put forward with regard to the ways and procedures for the sector's liberalization, taking into account the current technological developments, such as the high broadband penetration and the implementation of the e-governance and the e-state.

6.1.3. 13th Report of the European Commission (Implementation Report)

The 13th Report of the European Commission⁷⁸ monitors the progress of the Electronic Communications market in Europe during 2007 and identifies the key points that require the attention of the member states. EETT has contributed to the drafting of the Report, producing the necessary data that concern the Electronic Communications market in Greece.

The Report represents, on the one hand, the continuous decrease of fixed telephony (an approximate 5% revenues reduction) and, on the other hand, the further growth of the mobile telephony market (an approximate 4% increase of revenues) and of the broadband market (6% revenues increase).

Especially for Greece, the main conclusions that result from the Report are the following:

EETT

- Significant progress has been made in the sector, as a result of the passing of the new Law on Electronic Communications, which provides to EETT the institutional tools to carry out its work and promote the development of the market and the boost of competition.
- EETT's work regarding the implementation of the new Law and the issue of the necessary secondary legislation is applauded and described as successful. Special reference is made to the prompt completion of the market analysis, the adoption of the anticipated regulatory measures and the initiatives for the development of the broadband market. Also, emphasis is given to EETT's active policy regarding consumers' complaints, through Hearings procedures with Electronic Communications operators and the imposition of administrative sanctions.
- The Report notes the problem of inadequate human resources that certain NRAs face, one of which is EETT. It refers to the way with which EETT tries to resolve the problem through the setting up of Working Groups which handle specific projects.
- Positive reference is made to EETT's intervention in telephone directories and especially, to the reduction of the access cost (per hit), which is expected to boost competition in this particular market.

Greece

- A positive lead for Greece relates to the use of the 116 number: Greece is one of the 5 countries where this number has been assigned by the NRA to institutions for children that are missing and it is the only country where the number in question has already been activated.
- A big challenge for the country is the completion of the regulatory framework regarding the Rights of Way, given that any delay in this direction may seriously jeopardize the development of the competition in infrastructure.
- Another important issue is that of the delays in the appeals procedures, especially in cases where it is deemed that they go beyond the jurisdiction of the Administrative Court of Appeals, which often concludes the adjudication of the related cases very quickly.
- It is mentioned that in the mobile telephony market the problems with the installation of antennas still persisted, despite the passing of the new Law, with significant consequences in the deployment of 3rd

78. http://ec.europa.eu/information_society/policy/ecomm/library/communications_reports/index_en.htm

Generation Mobile Communications networks. Those problems were attributed to delays in the issue of the related secondary legislation.

- Special mention is made to the large number of complaints by consumers. According to the Report, these complaints in Greece were the result of the operators' incapability to respond to the high demand of broadband services and meet the needs of the consumers, resulting in losing their confidence in the market. According to the Report, the need to protect consumers is a challenge for all Europe, since the diversity of the offered products can easily lead to confusion. To this purpose, the member states intensify their efforts to inform and protect the consumers, in such a way that there is no overlapping in the efforts of the various competent organizations.

EETT and Broadband

- The Report makes reference to the rapid development of the broadband market in Greece during 2007. Also, it refers specifically to the progress made in **Physical Collocation** and to the rapid increase of the **Local Loop Unbundling (LLU)**. The important regulatory interventions in this area are the completion by EETT of the Regulations for the **Reference Unbundling Offer (RUO)** and the **Reference Broadband Offer (RBO)**.
- Greece –along with Spain, France, Portugal, the Czech Republic and Slovenia- is one of the countries where the effective regulatory policy has improved the market conditions and has allowed the alternative operators to move higher up on the ladder of investment (from bitstream to LLU).
- The average cost for full LLU access remained considerably lower compared to the European average (Greece was the 4th cheapest country, following Estonia, the Netherlands and Italy). The same goes for the average cost for **shared LLU access**, where Greece was the 5th cheapest country (following the Netherlands, Belgium, Cyprus and Malta).

The Course of the Broadband Market

- The development of broadband is attested by the fact that Greece has further improved its position in the broadband penetration table (27th at the end of 2006, 25th in June 2007 and 24th in December 2007). It should be noted, however; that there is a big distance that separates Greece from the European average (9.1% as opposed to 20%, i.e. a difference of 11%).
- As to the broadband penetration growth rate, in 2007, Greece registered a considerable progress compared to the EU. More specifically, the increase of broadband penetration in 2007 was 4.7 lines for every 100 inhabitants in Greece, as opposed to approximately 3.7

lines for every 100 inhabitants in the EU. Still, this difference is too small to cover the 11 percentage points that separate broadband penetration in Greece from that in the EU (EETT had repeatedly pinpointed this particular problem).

- The Report points out the low DSL coverage of the rural regions in Greece.

Mobile Telephony

- Retail prices in Greece remained among the highest in the EU, especially in the low use basket. On the contrary, the situation seems improved in the high use basket.
- Termination rates in mobile networks continued to be considerably higher in Greece compared to the European average (approximately 11 eurocents/ min. as opposed to 9.7 eurocents/ min.).

Fixed Telephony

- OTE's shares remained considerably higher compared to the European averages and registered a slight drop compared to 2006. The same goes for the percentage of the subscribers who used an alternative operator for national or international calls or for direct access to the telephone network.
- As to the termination rates on the network of the former state monopoly, Greece was below the European average in all categories (local, single, double) and more precisely, it was the 5th cheapest country in the local, the 8th in the single and the 6th in the double.
- On the basis of the cost of use baskets, Greece was a little above average for residential subscribers, below average for small or home offices and is the cheapest country for small and medium sized enterprises.

Number Portability

- There was a significant increase in the use of Number Portability in Greece.

Broadcasting

- The Report applauds the recent passing of a Law in Greece, which deals to a considerable degree with regulatory issues in the **broadcasting** market, through the assignment of certain necessary powers to EETT.

6.1.4. Other Official Committees

EETT contributes substantially to the shaping of the European developments by participating in Groups of the European Commission and other organizations. Such participations include, among others, the following: the Com-

munications Committee (COCOM), the Electronic Communications Committee (ECC), the Radio Spectrum Committee (RSC), the Telecommunications Conformity Assessment and Market Surveillance Committee (TCAM), the Administrative Cooperation (ADCO) and the Postal Directive Committee (PDC).

More specifically, in 2007, EETT participated in the ECC Working Group, which is responsible for the Frequency Management (WGFM). The WGFM, with the participation of the CEPT member states, issues special regulatory dispositions⁷⁹ for all matters that pertain to frequency management, such as mobile service, broadband wireless access, IMT systems and short range appliances. At the same time, EETT participated in the works of the sub-group for spectrum monitoring, the object of which was the implementation of procedures for measurement techniques, the conclusion of agreements for cross-border activities and the exchange of information at technical and administrative level.

Furthermore, EETT followed the works of the RSC Committee regarding the creation of a common regulatory framework for radio spectrum policy, as well as the availability and efficient use of radio spectrum. Also, it participated in the works of the Radio Spectrum Policy Group (RSPG), which assists and advises the European Commission on radio spectrum policy issues.

During 2007, EETT followed closely the developments in the field of the RTTE market surveillance and regulation, and exchanged experience with the corresponding European NRAs, through its active participation in the TCAM and ADCO of the European Commission.

Lastly, in December 2007, EETT participated in the Conference "1st Workshop – Main Developments in Postal Sector 2006 - 2008", which was organized by the Postal Service Unit of the Directorate-General Internal Market of the European Commission. During the Conference the initial results of the study for the Postal Services market were presented, which is expected to be completed in 2008. It is noted that EETT contributes to this work by providing data concerning the Greek Postal Services market.

6.2. International Partnerships

6.2.1. Independent Regulators Group (IRG)

EETT, through its participation in the IRG, pursued co-operation with its European partners aiming at further developing the unified Electronic Communications market. The main IRG actions were the following:

- The upgrade of the IRG Group and, mostly, the strengthening of its role as an institutional body, through the harmonization of the regulatory practices implemented by the member states and the creation of a strengthened permanent IRG Secretariat. As a result, in December of 2007, in Rome, the IRG was established in the form of a legal entity under Belgian law and seated in Brussels. The legal entity of the IRG was signed by 33 NRAs, among which was EETT. The aim of the new IRG will be to continue its successful work for the improvement of competition and the systematic regulation of the Electronic Communications market. At the same time, it will continue to work closely with the European Commission for the improvement of the implemented regulatory practices.
- The IRG dealt with the study of the Proposals by the European Commissioner for Information Society and Media, Mrs. Viviane Reding, regarding the review of the existing European Regulatory Framework for Electronic Communications and the creation of EECMA.

6.2.2. World Radiocommunication Conference

In 2007, EETT had an active presence in the European and international proceedings in the radiocommunications field. In co-operation with the Hellenic Ministry of Transport and Communications (MTC), EETT participated actively in the shaping of the Greek positions, which were presented at the World Radiocommunication Conference 2007 (WRC-07) held by the International Telecommunication Union (ITU). This Conference is one of the major meetings internationally for radiocommunications issues, seeing that the decisions made influence the development of the Electronic Communications for at least a decade.

The Conference took place between 22 October and 16 November 2007, following a preparatory work period of many years. One of the key issues discussed was the further development of 3rd and 4th Generation Mobile Communications Digital Systems (IMT systems), through the assignment of additional spectrum. Other issues that were discussed were the following:

- Upgrade of the radiolocation service.
- Development of applications of broadband aeronautical **telemetry** and telecommand.
- Review of the operational procedures and requirements of the Global Maritime Distress Safety System (GMDSS).
- Use of Ship Station Identities in research and rescue aircrafts.

79. Decisions, Recommendations and Reports.

- Operation of the broadband global satellite systems, which will provide high speed Internet services worldwide.

EETT co-ordinated the Working Group that was set up in Greece for the shaping of the Greek views and their incorporation in the Common European Proposals. In addition, it participated in the works of the Conference Preparatory Group (CPG), the Conference Preparatory Meeting (CPM) and the Electronic Communication Committee Working Group (ECC PTI) for the preparation of the World Radiocommunication Conference. As part of this preparation, EETT held in Athens, in 11 - 13 September 2007, the last ECC PTI meeting before the World Radiocommunication Conference. During this meeting the issue under discussion was the possibility to assign additional spectrum for the development of systems and services of 3rd and 4th Generation Mobile Communications.

6.2.3. Co-operation with Regulatory Authorities

2nd Euro-Mediterranean Meeting

One of EETT's priorities is the promotion of co-operation among the NRAs of the Mediterranean region. As part of this intention, EETT participated in the 2nd Euro-Mediterranean Meeting held in Rome, in December of 2007.

The above meeting contributed to the strengthening of the relations between IRG/ ERG members and the NRAs of the other Mediterranean countries, aiming at transferring know-how and reinforcing healthy competition in these particular markets. The meeting was organized under the auspices of the IRG/ ERG and the Information Society and Media Directorate General of the European Commission. Apart from the EU Mediterranean countries, the meeting was attended by representatives from the Electronic Communications NRAs of Egypt, Jordan, Israel, Lebanon, Morocco, the Palestinian National Authority, Syria, Tunisia and Turkey.

Bilateral Partnerships

EETT was particularly active at international level by promoting bilateral partnerships and participating in conferences and official meetings. In 2007, a Memorandum of Understanding was signed with the Regulatory Authority

of Italy (AGCOM), which was the beginning of a close co-operation between the two Authorities. Moreover, EETT has taken similar initiatives with the NRAs of Cyprus (OCECPR) and India (TRAI).

6.3. Goals

In the field of international relations, EETT has set the following goals:

- Continuous co-operation with the European Commission and with international organizations on issues that pertain to its jurisdiction in Electronic Communications and Postal Services.
- More active presence and supply of the necessary support to the MTC for the representation of the country to the European and international organizations.
- Consistent contribution to the shaping of the regulatory developments in the Electronic Communications sector; primarily through the ERG and the IRG.
- Promotion of co-operation among NRAs at a regional level and promotion of the bilateral partnerships, especially in the Balkans and the Mediterranean, through the initiatives of the Euro-Mediterranean ERG - EMERG co-operation network. EETT aspires to become the co-operation bridge between the IRG/ ERG and the NRAs of regional countries, through the transfer of know-how and the exchange of experience on liberalization issues.
- Strong presence and participation in European and international events in the radiocommunications sector.
- Systematic monitoring of the European developments in spectrum and radiofrequency issues.
- Contribution to the shaping of the European developments in the Postal Services sector through the active participation in the workings of the CERP and PDC Committees.
- Signing of a Memorandum of Understanding (MOU) with the NRAs of Cyprus and India, aiming at consolidating the co-operation with the two Authorities on issues of regulation and competition, in the Electronic Communications and Postal Services sectors.
- Shaping the appropriate conditions for a bilateral partnership with the Regulatory Authority of Egypt (NTRA) and the signing of an MOU.





07 EETT: Organizational Development



EETT is an Independent Administrative Authority, enjoying administrative and financial independence. Its main role is to regulate, supervise and monitor the Electronic Communications market and services, as well as the Postal Services market in Greece. EETT's efforts are directed towards the smooth operation of the two markets in a competitive environment, on the one hand, and the protection of consumers' rights and interests, on the other hand.

7.I. Internal Organization

7.I.1. Organizational Structure

EETT consists of:

- A nine-member Committee, which consists of the President, the Vice President for the Electronic Communications sector, the Vice President for the Postal Services sector and six more Members. The President and the Vice Presidents are selected and appointed by the Ministerial Council, upon the proposal of the Minister of Transport and Communications and the opinion by the Parliament's Committee on Institutions and Transparency. The rest of EETT's members are appointed by the Minister of Transport and Communications.
- The Legal Advisor.
- The Scientific Experts.
- The Permanent Personnel.

The organizational structure of EETT is presented in Chart 2.

7.I.2. Human Resources

At the end of 2007, EETT's personnel added up to 173 employees, compared to 150 at the end of 2006. Out of the above, 150 were employed on a permanent basis (i.e. holding a permanent position) and 20 were External Associates – Members of Working Groups. Also, 3 seconded policemen were serving at EETT for the needs of the Spectrum Monitoring Department. Furthermore, in 2007, 16 new staff members –Scientific Experts- were incorporated in EETT through a formal recruitment procedure⁸⁰.

The evolution of EETT's human resources is presented in Figure 8 and the number of employees per personnel category in Table I4.

The educational level of EETT's Personnel is presented in Figure 9.

7.I.3. Education Program for EETT's Employees

One of EETT's primary concerns is to keep its personnel constantly educated and to further train and qualify them according to their job specialization. To this purpose, EETT carries out an education program consisting of training seminars, participation in forums and international conferences etc.

The education program that was implemented during 2007 comprised of the following subjects:

1. Operation of Regulatory Authorities: the training focused on legal and economic issues that EETT deals with in its capacity as a Regulatory Authority.
2. State-of-the-art technologies: training in new technologies in the fields of radiocommunications, spectrum, satellite systems, Electronic Communications and numbering. Also, emphasis was laid on informing the staff who work in the Spectrum Monitoring Department regarding the safety precautions that need to be taken during their work in an environment with powerful electromagnetic fields.
3. Use of modern Information Systems: the employees were trained and specialized in information management systems and applications, as well as in the use of the Integrated Information System (IIS) of EETT.
4. Financial Analysis and Management: training and information on financial issues, payroll, financial management and accounting.
5. Managerial Skills: development of skills for the improvement of administrative support, internal and external communication, quality of service to the citizens, human resources and projects management.

80. 1/2006.

Chart 2
EETT's Organizational Chart



Figure 8
Evolution of EETT's Human Resources, 2000 - 2007

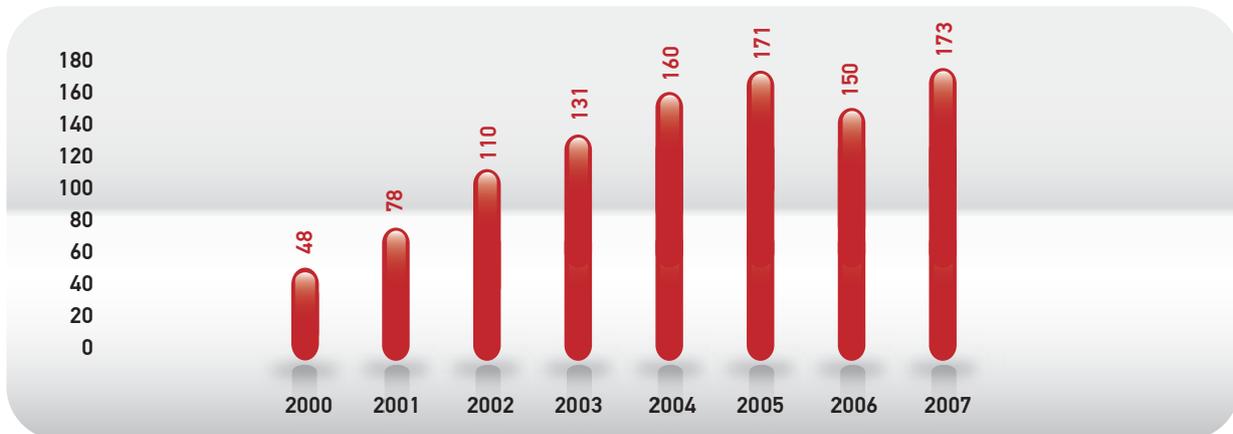
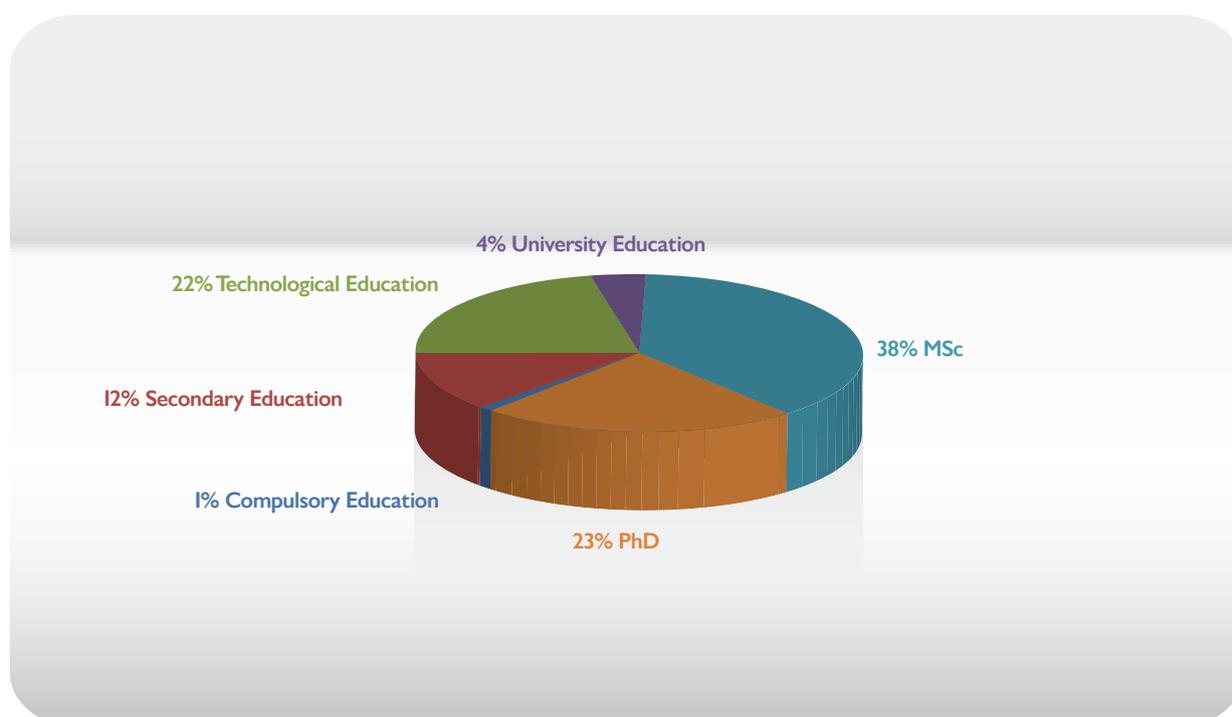


Table I4
Number of employees per Personnel Category, 2000 - 2007

Personnel Category	31.12.00	31.12.01	31.12.02	31.12.03	31.12.04	31.12.05	31.12.06	31.12.07
Scientific Experts	26	37	56	69	64	70	69	85
Permanent Personnel	10	21	35	42	42	63	66	68
Temporary Personnel	0	0	0	0	34	0	0	0
External Associates*	12	20	19	20	20	38	15	20
	48	78	110	131	160	171	150	173
* Members of Working Groups								

Figure 9
Educational Level of EETT's Personnel



In total, 20 educational programs were implemented of a total duration of 750 hours and with the participation of the entire EETT personnel. It should be noted that an important part of this education program was funded by the Information Society Operational Programme (OPIS), which is part of the 3rd Community Support Framework (CSF III).

7.1.4. Introductory Information of the New Personnel

EETT, aiming at incorporating more quickly in its working environment the new personnel that has been recruited, issued a manual with general introductory information. It

includes information regarding the mission, the role and operation of EETT, as well as other useful information that facilitates the adjustment and work routine of the employees in exercising their duties.

7.1.5. Interest for the Employees

Health and Safety Services

With a view to guaranteeing the safety and health of its workforce, EETT offers to its personnel the services of a health and safety inspector and of a work doctor; in co-operation with an external health and safety service associate.

This initiative aims at minimizing professional risk and preventing work accidents and diseases through taking the necessary measures and informing the employees.

To this purpose, a specialized company carried out measurements, using high technology instruments, in order to gauge the quality of air and level of light in all the offices, with positive results.

Moreover, EETT took additional measures in order to improve the working conditions following the recommendations of the safety inspector and in co-operation with an external health and safety service associate. Moreover, all the employees were informed by the inspector and the work doctor on individual measures of prevention to be taken during work time.

Free ADSL

As of 2006, EETT offers free ADSL connections to the homes of its employees. In this way, they become familiar with up-to-date methods of Internet access and enjoy all the benefits of broadband Internet, with regard to research, information and communication. In mid-2007, the speed of these connections was upgraded.

7.2. Operational Programme for the Information Society

During 2007, EETT continued implementing projects that are included in the OPIS, which is part of the CSF III. In total, 10 projects have been incorporated in the OPIS, which consist of 15 sub-projects. Out of them, 11 have already been completed and 4 of them are at an implementation stage, which will be concluded by the end of 2008.

7.3. Integrated Information System (IIS)

EETT's IIS is an ambitious project, which aims at upgrading the operation of EETT and improving the quality of services to consumers in the Electronic Communications and Postal Services markets.

The project aims at:

- Improving the productivity/ efficiency of the personnel.
- Reinforcing the prospects of horizontal co-operation among administrative units.
- Upgrading the information mechanisms and possibilities.
- Improving the services that EETT provides to the

citizens and to the organizations with which it converses.

The IIS consists of the following 4 sub-systems:

- Document and Process Management: it has a horizontal character and will support the electronic circulation and monitoring of documents.
- Support of Business Operations: it relates to the management and monitoring of Licences in the Electronic Communications and Postal Services sectors, as well as the management of consumers' complaints.
- Financial Management and Human Resources Management.
- Support of Communication with the External Environment: it provides the necessary infrastructure for the automation of EETT communication, publicity and information actions.

The software was implemented in 2007 and at the beginning of 2008 the first sub-systems are expected to be put into functional operation. The functional operation of all the IIS sub-systems has been scheduled for the spring of 2008.

7.4. Website

EETT continued improving its website, which began in 2006, aiming at upgrading its usability and functionality, and further enriching its content.

To this end, emphasis was given to areas of special interest, such as antennas, Rights of Way, broadband and frequently asked questions. At the same time, EETT has been investigating the possibility to create a discussion forum, thus enabling online consultations with the interested parties to be conducted via the Internet. Furthermore, it improved the structure of its homepage and simplified navigation in the menu and the various sections.

EETT used its website for publicizing the events that organized in 2007. More specifically, in the spring of 2007, EETT created a special microsite for the "2nd International Conference on Broadband Internet". Likewise, it embedded a web banner, advertising the forum "Electronic Communication Service Quality and Consumers' Protection".

Furthermore, the public was informed about EETT's activities, such as the Forum in Thessalonica under the topic "Mobile Telephony Antennas: Responsible Dialogue for

the Valid Information and the Protection of the Consumers”, the cycle of seminars “Postal Services: Legal Framework Implementation - Licensing” and the Broadband Week at Syntagma Square.

EETT’s upgraded website is a user-friendly tool for information and communication. It should be noted that in 2007, the number of visitors to EETT’s website exceeded 410,000.

The largest traffic was registered in the following sections: “Announcements”, “Advice for Consumers”, “Telecommunications”, “Regulatory Framework/ EETT Decisions” and “Press Releases”. In the section “Advice for Consumers”, remarkable traffic was noted in the Query/ Complaint Form, whereas in the “Electronic Communications” section, mostly visited were the categories “Numbering” and “Licensing”. Also highly visited was the “List of Registrars”.



Image 2: EETT’s Website

7.5. Goals

EETT's goals regarding its internal operation and information support are the following:

- Cover its needs in high level human resources. To this end, EETT will take all necessary actions to recruit 26 Scientific Experts.
- Upgrade its operation and improve its efficiency with regard to the provision of services to citizens and to the organizations with which it co-operates, through the implementation and operation of the IIS.
- Introduce a flexible system of "management by objectives" which will effectively cover EETT's management needs.
- Record the existing internal procedures and elaborate a Quality Manual for the main operations of EETT.
- Upgrade the education program for the personnel.
- Implement an electronic signature system to the electronically circulated EETT documents.
- Redesign EETT's website, in order to make it more functional, enrich its content, improve search functionality and permit interactivity and interconnection with EETT's operational applications.
- Find new and better premises for EETT's headquarters in Athens, in co-operation with the Hellenic Public Real Estate Corporation. This project is expected to be completed in 2009.
- Find and rent new premises for the Thessalonica offices, which will cover their urgent accommodation needs.

7.6. Financial Statements

ASSETS		Amounts for the Period ended 2007			Amounts for the Period ended 2006			CAPITAL AND LIABILITIES	
		Acquisition Value	Depreciation	Net Value	Acquisition Value	Depreciation	Net Value	Amounts for the Period ended 2007	Amounts for the Period ended 2006
B. PREOPERATING COST								A. OWNER'S EQUITY	
1. Start up expenses		465,538.80	304,294.51	161,244.09	465,538.60	211,186.75	254,351.85	III. Reserves from value adjustments - Investments subsidiaries	
4. Other preoperating expenses (s/w)		2,127,751.25	2,100,309.67	27,441.58	2,127,751.25	1,883,816.73	243,934.52	3. Investments subsidies on Fixed Assets (CSF III)	1,581,421.35
		<u>2,593,289.85</u>	<u>2,404,604.18</u>	<u>188,685.67</u>	<u>2,593,289.85</u>	<u>2,095,003.48</u>	<u>498,286.37</u>	IV. Capital Reserves	
C. FIXED ASSETS								2. Charter stipulated reserves	293,470.29
II. Tangible Assets								3. Special reserves	15,430.67
5. Vehicles		176,424.05	153,912.52	22,511.53	176,424.05	134,760.88	41,663.17	Capital expenditure	33,657,015.90
6. Furniture and fixtures		11,825,790.04	9,196,176.86	2,629,613.18	11,686,672.03	7,204,720.40	4,481,951.63	Special reserves art. 60 (Law 3431/2006)	33,965,916.86
7. Payments on account and construction in progress		164,530.80	0.00	164,530.80	164,530.80	0.00	164,530.80		308,900.96
Total Tangible Assets (C II)		<u>12,166,744.89</u>	<u>9,350,089.38</u>	<u>2,816,655.51</u>	<u>12,027,626.88</u>	<u>7,339,481.28</u>	<u>4,688,145.80</u>	V. Profits Carried Forward	
III. Participations and other Long-term Receivables								Profits carried forward	81,332,492.19
7. Other long-term receivables				219,971.84			205,287.80		95,689,613.01
Total Fixed Assets (CII + CIII)				<u>3,036,627.35</u>			<u>4,893,433.20</u>		95,689,613.01
D. CURRENT ASSETS								Total Equity (AIII+AV+AV)	126,879,830.40
I. Inventories									98,867,646.20
4. Raw and auxiliary materials, consumables and spare parts				254,536.62			254,536.62		
II. Receivables								B. PROVISIONS FOR LOSSES & EXPENSES	
1. Trade debtors		3,256,150.36		2,620,080.92	1,393,125.88		439,789.42	2. Other provisions	3,058,663.26
Less: Provisions (44.11)			636,069.44	2,620,080.92					561,159.43
11. Sundry debtors				36,428,985.49			953,336.46		
12. Advances and control account credits				73,191.80			26,639.89		
				<u>39,122,258.21</u>			<u>9,620,433.28</u>		
IV. Cash and Deposits								C. LIABILITIES	
1. Cash in hand				2,662.09			3,137.80	II. Current Liabilities	
2. Time and Sight deposits				147,643,680.85			116,234,595.55	1. Suppliers	1,494,227.62
				<u>147,646,342.94</u>			<u>116,237,733.15</u>	4. Customers' advances	259,471.35
Total Current Assets (DI + DII + DIV)				<u>187,023,137.77</u>			<u>126,112,703.05</u>	5. Taxes and duties payable	285,680.14
E. TRANSITIONAL ASSET ACCOUNTS								6. Social security withholdings	236,398.98
1. Deferred expenses				1,851.22			1,876.16	11. Sundry creditors	22,764,567.58
2. Deferred income				1,288,942.17			811,359.69		622,606,016.34
				<u>1,290,793.39</u>			<u>813,235.85</u>		
TOTAL ASSETS (B+C+D+E)				<u>191,539,244.18</u>			<u>132,117,658.47</u>	TOTAL LIABILITIES AND OWNERS' EQUITY (A+B+C+D)	<u>191,539,244.18</u>
MEMO ACCOUNTS (DEBIT)								MEMO ACCOUNTS (CREDIT)	
2. Guarantees and Liens				22,350,464.05			20,505,230.47	2. Guarantees and Liens	22,350,464.05
Debit Accounts				<u>419,272.73</u>			<u>48,871,579.73</u>	Credit Accounts	419,272.73
4. Tax free reserve from accounting differences				22,769,736.78			69,376,810.20	4. Tax free reserve from accounting differences	22,769,736.78
									69,376,810.20

NOTE: In the Balance Account "Sundry Debtors" are included receivables amounting in total to 36,425,575.49 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, which will be collected in accordance with the procedure under the Public Revenues Collection Code and will be registered in the respective revenues of accounting period which will be collected. The amounts from the aforementioned fines are in the transit accounts of the liabilities "Revenues cashed in advanced".

INCOME STATEMENT (PROFIT & LOSS ACCOUNT) FOR THE YEAR ENDED 31 st DECEMBER 2007 (1 JANUARY - 31 DECEMBER 2007)		PROFIT DISTRIBUTION TABLE	
Amounts for Period ended 31-12-2007		Amounts for the period ended 2007	
I. OPERATING RESULTS			
Turnover (fees received)	39,977,008.61	36,820,501.80	
Less: Cost of services provided	14,336,248.21	13,088,222.84	
Gross operating results	25,640,760.40	23,732,278.96	
Plus: Other operating income	4,893,702.12	8,130,489.06	
Total	30,534,462.52	31,862,739.02	
Less: 1. Administrative expenses	4,045,484.42	3,102,893.54	
Sum total of Operating results	26,488,978.10	28,549,845.48	
Plus: 4. Credit interest and related income	5,661,469.45	3,708,089.71	
Less: 3. Interest, charges and related expenses	1,876.53	2,334.64	
Total Operating Results	32,148,571.02	32,255,600.55	
II PLUS: EXTRAORDINARY RESULTS			
1. Extraordinary and non operating income	1,293,587.44	1,632,085.04	
3. Income from previous periods	134,586.77	0.00	
	1,428,154.21	1,632,085.04	
Less: 1. Extraordinary and non operating expenses	8,397.75	1,577.31	
3. Prior period expenses	58,663.26	447.44	
4. Provisions for nonrecurring expenses	3,263,341.03	439,789.42	
Operating and extraordinary results	30,313,384.20	33,445,871.42	
Total depreciation on Fixed Assets	2,320,208.80	3,117,011.43	
Less: Depreciation incorporated to operating costs	0.00	0.00	
NET RESULT (PROFIT) BEFORE TAX	<u>30,313,384.20</u>	<u>33,445,871.42</u>	

THE ACCOUNTABLE FINANCIAL ADMINISTRATOR		HEAD OF THE DIRECTORATE FOR FINANCIAL AND ADMINISTRATIVE SERVICES		HEAD OF THE EETT FINANCE DEPARTMENT	
EETT CHAIRMAN					
NIKITAS ALEXANDRIDIS I.D. N° : AB 064557		IOANNIS ATHANASIOU I.D. N° : Z 730452		GIORGOS ORFANOS I.D. N° : AT AZ 095429 ECONOMIC CHAMBER OF GREECE CLASS A REG N° 0039370	

REPORT OF CERTIFIED AUDITOR-ACCOUNTANT
To the "Hellenic Telecommunications and Post Commission"

Report on Financial Statements
We have audited the above Financial Statements of the "Hellenic Telecommunications and Post Commission" which are consisted of the Balance Sheet as of December 31st 2006, the Income Statement (Profit and Loss Account) and the Profit Distribution Table for the period ended on the 31st of December 2007.
Administration Responsibility on Financial Statements
The Administration of "Hellenic Telecommunications and Post Commission" has the responsibility for conducting and presenting the Financial Statements in accordance with the Accounting Standards prescribed by Greek Legislation. Such a responsibility includes planning, application and maintenance of an internal Financial Statements control system free from essential inaccuracy, caused by fraud or error. This responsibility also includes the selection and implementation of appropriate accounting policies and the conduct of accounting estimations that are reasonable for the circumstances.
Certified Auditors' Responsibility
Our responsibility is the expression of an opinion on the above Financial Statements, according to our auditing data. Our audit was conducted in accordance with the Greek Auditing Standards, which are in line with the International Auditing Standards. These Accounting Standards require our conformity with the rules of business ethics. The planning and the conduct of our audit aim at the legitimate guarantee that the Financial Statements are free from substantial inaccuracy. The audit entails the conduct of procedures for collecting the audit records which is relevant to the amounts and the information that are included in the Financial Statements. The choice of procedures lie on the supervisor's judgement and entail the estimation of the substantial risk for the inaccuracy of the Financial Statements, due to fraud or error. For this risk estimation, the auditor takes into account the internal control system which is relevant to the formation and the reasonable presentation of the Financial Statements, in order to outline audit procedures for the circumstances and not to express an opinion about the effectiveness of the internal control system of the "Hellenic Telecommunications and Post Commission". The audit also entails the appreciation for the suitability of the applied accounting policies and the reasonability of the Administration's estimations, as well as the appreciation of the total presentation of the Financial Statements.
We believe that the auditing data that we have assembled are sufficient and suitable for the foundation of our opinion.
Opinion
In our opinion, the above Financial Statements reflect reasonably and under any substantial opinion the economic situation of the "Hellenic Telecommunications and Post Commission" as of December 31st 2006 and its financial performance for the fiscal year ended on that date, in accordance with the Accounting Standards prescribed by Greek Legislation.
Report on other legal and regulatory issues
The content of EETT's Presidential proposal to the Plenary regarding the Annual Report is consistent with the above Financial Statements.

Maroussi, 18 April 2008
The Certified Auditor - Accountant
LEONIDAS SP. KAVVADIAS
ICPA REG. NO. 10711



08 Appendices



Greek Legislative Regulatory Framework (from 01-01-2007 to 31-12-2007)

I. Law, Presidential Decrees and other Legislative Acts

With the articles 23 and 24 of Law 3534/2007 “Establishment of an Authority for the distribution of the available time of use in the Greek airports and other provisions”, GG Issue 40/A/2007, Law 3431/2006 was amended.

In virtue of EETT Plenary Decision-Opinion 415/51/20-12-2006, the Decision 28120/974/11-05-2007 of the Minister of Transport and Communications “Conditions, selection criteria and procedure for the definition of Universal Service Provider”, GG Issue 824/B/25-05-2007 was issued.

In virtue of EETT Plenary Decision-Opinion 415/52/20-12-2006, the Decision 31923/1135/24-05-2007 of the Ministers of Economic and Finance and of Transport and Communications “Definition of the allocation procedure for the universal service net cost and compensation of the Universal Service Provider”, was issued GG Issue 876/B/05-06-2007.

In virtue of EETT Plenary Decision-Opinion 436/36/24-05-2007, the Decision 44365/1631/09-08-2007 of the Ministers of Economic and Finance and of Transport and Communications “Ensuring reasonable prices in the framework of Universal Service provision”, was issued GG Issue 1618/B/17-08-2007.

In virtue of EETT Plenary Decision-Opinion 436/37/24-05-2007, the Decision 44035/1626/01-08-2007 of the Minister of Transport and Communications “Definition of Universal service content”, was issued GG Issue 1481/B/16-08-2007.

II. Regulatory Texts on the Basis of Legislative Authorization in Virtue of Law 3431/2006

EETT Decision 417/01 “Regulation on the Attribution to the Greek Atomic Energy Commission (GAEC) of an annual fee for the Installation and Operation of Antenna Constructions”, GG Issue 183/B/14-02-07.

EETT Decision 418/016/19-01-2007 regarding “Results of the Hellenic Telecommunication Organizations (OTE SA) cost audit for the year 2006 (actual data as of 2004)/ temporary invoices 2007”, GG Issue 253/B/02-02-2007.

EETT Decision 420/033/2-2-2007 “OTE obligation on the satisfaction of Transfer requests from Wholesale Broadband Access Services to Local Loop Unbundling/ Pilot im-

plementation of Transfer Procedure”, (GG Issue 218/B/22-02-2007).

EETT Decision 425/094/08-03-2007 “Definition of the national market for retail Access to the Public Telephony Network from a fixed location through Primary Rate Access ISDN, definition of undertakings with Significant Market Power in the market in question and their obligations”, (GG Issue 483/B/05-04-2007).

EETT Decision 425/093/08-03-2007 “Definition and analysis of the national market for the retail international telephony services available to public, provided in a fixed location to residential and non residential customers”, GG Issue 467/B/04-04-2007.

EETT Decision 427/46/22-03-2007 “Amendment of EETT Decision 420/33/02-02-2007 OTE obligation for the satisfaction of Transfer Requests from Wholesale Broadband Access to Local Loop Unbundling/ Pilot implementation of Transfer Procedures”, GG Issue 467/B/04-04-2007.

EETT Decision 428/13 “Regulation of Transfer of Radio-frequency Rights of Use”, GG Issue 638/B/27-04-2007.

EETT Decision 429/015/04-04-2007 “Approval of OTE 2007 Reference Offer for Local Loop Unbundling and the related facilities, in accordance to EETT Decision 388/012/31-05-2006 (GG Issue 932/B/08-07-2006)”, GG Issue 620/B/25-04-2007.

EETT Decision 432/146/26-04-2007 “Approval of the Code Of Practice for the provision and operation of the Carrier Pre-Selection service”, GG Issue 955/B/14-06-2007.

EETT Decision 437/001/01-06-2007 “Approval of OTE 2007 Reference Offer for the provision of Wholesale Broadband Services and related facilities, in application of EETT Decision 389/051/08-06-2006 (GG Issue 891/B/12-07-06)”, GG Issue 1013/B/21-06-2007.

EETT Decision 437/002/01-06-2007 “Approval of OTE 2007/ 2008 Reference Interconnection Offer; in accordance to EETT Decision 406/034/11-10-2006 (GG Issue 1669/B/2006)”, GG Issue 1014/B/21-06-2007.

EETT Decision 443/028/09-07-2007 “Amendment - Correction of the provisions of EETT Decision 429/015/04-04-2007 related to the Approval of OTE 2007 Reference Offer for Local Loop Unbundling and the related facilities, in accordance to EETT Decision 388/012/31-05-2006 (GG Issue 932/B/2006)”, GG Issue 1555 B/17-08-2007.

EETT Decision 443/068/09-07-2007 “Results of the Hellenic Telecommunications Organization S.A. (OTE S.A.) 2007 cost audit (actual data as of 2005)”, GG Issue I422/B/08-08-2007.

EETT Decision 448/206/21-07-2007 “Assessment of Discounted Cash Flow (DCF) methodology for the retail minus calculation of the prices for wholesale Broadband

Access Type B, in accordance with EETT Decision 389/051/2006 (GG Issue 891/B/12-07-2006)”, GG Issue I731/B/30-08-2007.

EETT Decision 451/10/11-09-2007 “Code Of Practice for the provision of multimedia information”, GG Issue I943/B/01-10-2007.

Glossary

ADSL	Broadband technology that uses the existing copper cable of telephony connections to achieve higher data transmission rates (and the simultaneous voice transmission).
Active Subscribers	The term "active subscribers" refers to all subscribers under contract or prepaid status, who have contributed to the generation of income during the last three months. The specific income may be either retail (call or Short Message Service-SMS/ Multimedia Messaging Service-MMS etc.) or wholesale (call reception or SMS/ MMS etc.).
Administrative Cooperation (ADCO)	Committee responsible mainly for the support of actions related to the common resolution of problems and the exchange of experiences in issues of Radio and Telecommunications Terminal Equipment (RTTE) market surveillance.
Broadcasting	Transmission of sound and/ or optical signals (programs) to a broad number of recipients (audience or viewers).
Call Termination	The Electronic Communications service where one of the contracting parties (the one providing the service) terminates to its network a call coming from the network of the other contracting party.
Carrier Pre-Selection	The option given to OTE subscribers, if they so wish, to select as a default the operator who will process one or more categories of calls (international, local, national and calls to mobile phones). This option eliminates the requirement to dial the specific four-digit or five-digit code, as in the case of Carrier Selection.
Carrier Selection	The option offered to OTE subscribers to make calls through another operator by dialling a special four-digit or five-digit Carrier Selection Code assigned to the specific operator before the desired number.
Certification Service Providers (CSPs)	Individuals or legal entities or other carriers issuing certificates or providing other services, with respect to the Electronic Signatures.
Charter of Obligations to Consumers (COC)	The undertakings providing Postal Services under a General Authorization must prepare a COC to include (a) description of characteristics of the provided service and the time limits within which it is provided, (b) information for users about prices, based on the data affecting them including expected improvement of service quality, (c) the Dispute Resolution Committee with

the participation of a users representative and right of attendance for the interested user (consumer). The COC also contains all other necessary information in relation to the characteristics of the Postal Services provider, the obligations and commitments to users, the management of postal items, user service and potential compensation.

Co-Mingling

Refers to the capability of allocation of an Electronic Communications operator's equipment in a space within OTE's Local Exchanges, where the related equipment of OTE is hosted without partitions or a separate room for the operator. The maintenance and operation of operator's equipment takes place by the operator.

Comité Européen de Réglementation Postale (CERP)

Committee founded in 1992 in the frame of CEPT (European Conference of Postal and Telecommunication Administration) and deals with postal issues.

Comprehensive Directory

The directory including fixed and mobile telephony numbers of all operators' subscribers.

Dialers

Dialers are software that can be transmitted through the Internet and can be installed in the computer of the consumer. This software changes the settings of the consumer's modem from one internet address to another. Usually, the change is from the common number of the Internet Service Provider (ISP) that the consumer uses, to a high cost number, either of a 90X XXX XXXX series or a number abroad (00X XXX XXXX).

Dispatch

The service in which one of the two contracting parties dispatches a call from the network of the other party to a third party network.

Distant Collocation

Form of collocation according to which in the framework of OTE's legal obligations, an Electronic Communications operator obtains access to OTE sources through connecting cables.

Domain Names

An alphanumeric element which individualizes a computer connected to a network or group of computers connected to a network, according to the principles of the Internet Domain Name System.

Double-play Services

The term that is used in Electronic Communications for the provision of a narrowband service (telephony) and a broadband service (Internet) through a single broadband connection.

European Conference of Postal and Telecommunications Administrations (CEPT)

It was founded in 1959 by 19 countries. Today it counts 48 member states and covers almost all the geographical area of Europe. Its activities include commercial, administrative, regulatory and technical standardization issues.

European Regulators Group (ERG)

The ERG consists of the 25 European Union National Regulatory Authorities (NRAs) and 8 observer NRAs (Bulgaria, Croatia, Iceland, Lichtenstein, Norway, Romania, Switzerland and Turkey). ERG aims at encouraging collaboration and co-ordination between NRAs and the European Commission, in order to promote the development of the internal market for Electronic Communications of networks and services. In parallel it seeks consistent implementation by all member states of the provisions laid down in the Directives of the European Regulatory Framework.

Fixed Service (Radiocommunications)

Radiocommunications service that includes wireless Electronic Communications networks between specified fixed points.

Free-of-Charge Number

Call for which the caller is not charged.

Frequency Map

Imprint of the available channels for use in a specific geographic location and under preset circumstances.

Fully Distributed Cost (FDC)

The costing method according to which all the cost elements, including the indirect cost, are distributed to the generated products or the provided services through a total of algorithms.

Geographic Numbers

The numbers whose prefix denotes the geographic location of the number holder.

Granting Radiofrequency Rights of Use

Authorization provided to a person, for the commencement of use of a radioelectric station with a specific radiofrequency or a specific radioelectric channel, at a particular location and with particular technical characteristics.

Imaginary Number

The number that one-way defines the specific twisted pair of copper cable which end up in the subscriber, denoting the Local Loop ID.

IMT Systems

Technology which includes "IMT-2000", the family of standards for the 3rd Generation Mobile Communications, recognized by the International Telecommunication Union (ITU) with the common name "3G" (UMTS), as well as "IMT Advanced" which includes the family of standards for the 4th Generation "4G" Mobile Communications systems through which the wireless mobile broadband access to cellular architecture will be provided everywhere.

Incremental Cost

The incremental cost of a service, defines usually the lowest value that a service can be charged with, provided that only the cost that changes in relation to the provision of the service in the short term, is included and assuming that the portfolio of services of the Significant Market Power (SMP) Electronic Communications operator does not present any alteration in its provision.



Independent Regulators Group (IRG)

The IRG was established in 1997, as an informal group of European NRAs, aiming at the exchange of views, experiences and practices among its members concerning issues of common regulatory interest. Taking into account the composition of the official group of ERG by the European Commission in 2002, IRG currently plays a symbolic role.

Interconnection

The physical and logical connection of Electronic Communications networks of the contracting parties in order to provide users with the ability to communicate with each other or with users of a third party, or in order to have access to services provided by a third party.

Interference

The result of an unwanted action due to one or more transmissions, radiations or inductions during reception to a radio system, demonstrated as any fall in performance, wrong interpretation or loss of information, which would have been received had this unwanted action not taken place.

International Incoming Traffic

The total traffic terminating to an operator's network, originating from foreign operators.

International Outgoing Traffic

The total traffic originating from an operator's network, terminating to foreign operators.

International Telecommunication Union (ITU)

The ITU is the specialized agency of the United Nations (UN) that deals with the development of Electronic Communications networks and services worldwide. The ITU was founded in May 17, 1865 and Greece is a founding member. Its headquarters are in Geneva and all the member states of the UN are members of the ITU.

Link

The total of telecommunications equipment required for implementing the connection between two points of a Electronic Communications network.

Local Loop

The circuit that connects the terminating point of each subscriber with the main distributor in the OTE Local Exchange.

Local Loop Unbundling (LLU)

LLU allows other operators, except OTE, to use the wire connecting consumer's premises to the public telephone network (specifically to the nearest OTE's Local Exchange) and provide in this way Electronic Communications services.

Long Run Average Incremental Cost (LRAIC)

The costing method according to which the total long run average incremental cost of a service equals to the difference deriving when from the total cost of an undertaking providing a total of services, we subtract the total cost of the undertaking if it continues offering all the services excluding the specific one.

Mobile Service	Radio service between Mobile Stations and Land Stations or between Mobile Stations.
Multimedia Information Services (MIS)	Electronic Communications services that concern information/ content transmission in Electronic Communications networks. The invoicing of the multimedia services is done through the charging of numbering resources of the National Numbering Plan (NNP) and mainly the series 901, 909, 14, 190-195 and 54. The services include Audiotext services, Videotext, Premium Short Message Services (PSMS) and Premium Multimedia Messaging Services (PMMS). The provision of multimedia services can also take place through Internet.
National Incoming Traffic	The total traffic terminating to an operator's network, originating from the networks of other domestic fixed or mobile telephony operators.
National Numbering Plan (NNP)	Rules defining the structure of numbers used by Electronic Communications operators for the provision of services to users.
National Outgoing Traffic	The total traffic originating from an operator's network, terminating to the networks of other domestic fixed or mobile telephony operators.
National Reference Database on Number Portability (NRDNP)	Database that processes the exchange of information between operator-donor and operator-recipient for the implementation of Portability applications and sends to all operators the information required to route calls to the transferred numbers.
Next Generation Networks (NGN)	Packet Switching networks, for the provision of broadband Electronic Communications services based on multiple access and backbone technologies (reaching high quality levels). Furthermore these technologies could provide continuous service coverage to the user and access to more than one service operators simultaneously (if desired).
Non-geographic Numbers	All numbers except geographic ones, namely the numbers whose prefix does not denote the geographic location of the holder.
Number Portability	The option given to consumers to maintain their telephone number when changing operator.
Physical Collocation	Form of collocation according to which OTE in the framework of its legal obligations constructs a special space in its Local Exchanges which is provided to Electronic Communications operators for the installation of equipment.
Premium Rate Numbers	Non-geographic numbers the rate of which exceeds national call rate.



Private Mobile Radio (PMR)	The term describes professional radio networks of land mobile service used to meet communication needs of various professional users, like communication networks of transport companies, radiotaxi, security companies, as well as emergency services like the Fire Brigade or the National First Aid Centre (EKAB).
Quad-play Services	The term that is used in Electronic Communications for the provision of a narrow band service (telephony) and two broadband services (Internet and TV) through a single broadband connection and mobile telephony services.
Radio Aids	Telecommunication systems of Civil Aviation Authority (CAA) providing the pilots with information on the command of the aircraft.
Radio and Telecommunications Terminal Equipment (RTTE)	See Radio Equipment, Telecommunications Terminal Equipment.
Radio Equipment	Equipment which includes transmitter and/ or receiver and provides communication through radio waves with the use of spectrum.
Radiocommunications Service	A service including transfer, transmission and/ or reception of radio waves for special Electronic Communications purposes.
Reference Interconnection Offer (RIO)	The reference document used as a basis for the Interconnection contract among OTE and other operators. This document is released by OTE and approved by EETT.
Reference Unbundling Offer (RUO)	The reference document used as a basis for the contract signed for LLU provision by OTE to other operators. This document is released by OTE and approved by EETT.
Satellite Services	Services whose provision is based in whole or in part on the installation and operation of earth satellite stations networks. These services include, as a minimum, radio link via earth satellite stations with the space part (uplinks) and radio link between the space part and earth satellite stations (downlinks).
Services Ancillary to Broadcasting	Services ancillary to broadcasting involve services of radio-TV program transmission from production point to the transmission network or the network for the coverage of an athletic event, an external performance or any other urgent event. For the coverage of such events radio equipment, like wireless cameras and microphones as well as portable microwave links and voice transmission systems are required.
Shared Access Service	A call the cost of which is shared between caller and called, given that the charge does not exceed the maximum normal charge of a national call.

Significant Market Power (SMP)	An enterprise is considered to hold a Significant Market Power when, either individually or in co-operation with other enterprises, is holding a position equivalent to dominant position, i.e. financial power which allows it to operate to a great extent independently from the competition, the customers, and the consumers.
Special Postal Items Track and Trace System (SPITTS)	Information system for the tracking and tracing of postal items.
Telecommunications Conformity Assessment and Market Surveillance Committee (TCAM)	Committee established to assist the European Commission and to issue opinions in relation to monitoring tasks as far as it concerns the application of Directive 99/5/EC. Provided that it is considered worthwhile it issues guidelines on various matters.
Telecommunications Terminal Equipment	Equipment intended to be connected directly or indirectly by any means whatsoever to Electronic Communications networks (mobile telephony networks, public analogue and digital telephony networks and data networks) used for the provision of publicly available Electronic Communications services.
Telemetry	The use of Electronic Communications for the automatic indication or recording of measurements, performed at a distance from the measurement instrument.
Triple-play Services	The term that is used in Electronic Communications for the provision of a narrow band service (telephony) and two broadband services (Internet and TV) through a single broadband connection.
Universal Service - US (in the Electronic Communications sector)	The provision of a fixed set of basic Electronic Communications services available to all citizens of Greece, regardless of their geographic location, at affordable prices.
Universal Service - US (in the Postal Services sector)	The right granted to Postal Services users, regardless of their location in the Greek Territory, to permanently and affordably enjoy special quality Postal Services. The Universal Service in the Postal Services sector includes: a) the collection, transport, sorting and distribution of postal items up to 2 kg, b) the collection, transport, sorting and distribution of postal parcels up to 20 kg, c) services of registered mail and deliveries with declared value. The US includes both national and cross-border services.
Universal Service Provider - USP (in the Electronic Communications sector)	The body assigned by the Greek state with the obligation to ensure the provision of Universal Service in Electronic Communications.

**Universal Service Provider –
USP (in the Postal Services
sector)**

The carrier assigned by the Greek state with the obligation to ensure provision of the Universal Postal Service. Hellenic Post (ELTA) is the current USP.

**Very Small Aperture Terminals
(VSAT)**

Station terminals with small aperture antenna.

Virtual Collocation

Refers to the capability of collocation of an Electronic Communications operator's equipment in a space within OTE's Local Exchanges, where the related equipment of OTE is hosted, for purposes of full or shared LLU. The maintenance and operation of equipment takes place by OTE.

**Voice over Internet Protocol
(VoIP)**

It is a general term used to describe the transmission of voice through data networks using packet switching in contradiction to circuit switching that is being used to traditional telephony. This technology allow for call making through Internet.

Wireless Fidelity (Wi-Fi)

Wireless local network, which uses radio frequencies to transmit and receive data, based on the IEEE 802.11 standards group.

Abbreviations

ADAE	Hellenic Authority for the Information and Communication Security and Privacy
ADCO	Administrative Cooperation Group
ADSL	Asymmetric Digital Subscriber Line
AGCOM	Autorità per le Garanzie nelle Comunicazioni (Italian NRA)
AIA	Athens International Airport
B2B	Business To Business
B2C	Business To Consumers
C2B	Consumers To Business
CAA	Civil Aviation Authority
CEPT	Conference of European Postal and Telecommunications
CERP	Comité Européen de Réglementation Postale
COC	Charter of Obligations to Consumer
COCOM	Communications Committee
CPG	Conference Preparatory Group
CPM	Conference Preparatory Meeting
CSF III	3 rd Community Support Framework
CSP	Certification Service Provider
CSS	Consumer Service Sector
CSST	Commission for the Safeguard of the Secrecy of Telecommunications
DCF	Discounted Cash Flow
DCS	Digital Communication System
DEH	Public Power Company
DEPA	Public Gas Corporation
ECC	Electronic Communication Committee
ECN	European Competition Network
EDV	Express Delivery Voucher
EECMA	European Electronic Communications Market Authority
EETT	Hellenic Telecommunications & Post Commission
EKAB	National First Aid Centre
ELAS	Hellenic Police
ELOT	Hellenic Organization for Standardization
ELTA	Hellenic Post
EMERG	Euro-Mediterranean ERG
EMY	Hellenic National Meteorological Service
ERG	European Regulators Group
ERT	Hellenic Broadcast Corporation
ETA	Environmental Terms Approval
ETSI	European Telecommunications Standards Institute
EU	European Union
EUTELSAT	European Telecommunications Satellite
EVDAF	National Reference Data Base on Number Portability
FD	Fire Department
FDC	Fully Distributed Cost
FMS	Fixed Monitoring Stations
FTTC	Fiber To The Cabinet
FTTH	Fiber To The Home
FWA	Fixed Wireless Access
GAEC	Greek Atomic Energy Commission
GG	Government Gazette Issue
GMDSS	Global Maritime Distress and Safety System
GSM	Global System for Mobile Communications
HCCIS	Hellenic Company of Computers and Informatics Scientists
ICC	Internal Connecting Cable
IIS	Integrated Information System
ILPAP	Electric Buses of Athens and Piraeus
IMT	International Mobile Telecommunications
IPC	International Post Corporation
IPTV	Internet Protocol Television
IRG	Independent Regulators Group



ISDN	Integrated Services Digital Network
ISP	Internet Service Provider
ITU	International Telecommunication Union
ITU-R	International Telecommunication Union – Radiocommunication Sector
JMD	Joint Ministerial Decision
KEDKE	Central Union of Municipalities and Communities
LLU	Local Loop Unbundling
LRAIC	Long Run Average Incremental Cost
MD	Ministerial Decision
MIS	Multimedia Information Services
MMS	Multimedia Messaging Service
MMS	Mobile Monitoring Stations
MTC	Ministry of Transport and Communications
NCRTV	National Council for Radio and Television
NFAT	National Frequency Allocation Table
NGA	Next Generation Access
NGN	Next Generation Network
NMS	National Meteorological Service
NNP	National Numbering Plan
NNRT	National Network on Research and Technology
NRA	National Regulatory Authority
NSMMS	National Spectrum Management and Monitoring System
NSSG	National Statistical Service of Greece
NTRA	National Telecommunications Regulatory Authority (NRA of Egypt)
OCECPR	Office of Commissioner of Telecommunications and Postal Regulations
OLOs	Other Local Operators
OPIS	Operational Programme for the Information Society
OPS	Integrated Information System
OSN	One Stop Notification
OTA	Local self-Government Organizations
OTE	Hellenic Telecommunications Organization
PCM-4	Pulse Code Modulation for 4 Channels
PDC	Postal Directive Committee
PIBs	Principles of Implementation and Best Practice
PMMS	Premium Multimedia Messaging Service
PMR	Private Mobile Radio
PPN	Public Postal networks
PSMS	Premium Short Message Service
PT1	Project Team 1
RBO	Reference Broadband Offer
RIO	Reference Interconnection Offer
RLAN	Radio Local Area Network
RSC	Radio Spectrum Committee
RSPG	Radio Spectrum Policy Group
RTTE	Radio and Telecommunications Terminal Equipment
RUO	Reference Unbundling Offer
SATPE	Greek Licensed Telecommunications Providers Association
SLA	Service Level Agreement
SMP	Significant Market Power
SMS	Short Message Service
SNG	Satellite News Gathering
SPITTS	Special Postal Items Track and Trace System
SRDs	Short Range Devices
TCAM	Telecommunications Conformity Assessment and Market Surveillance Committee
TRAI	Telecom Regulatory Authority of India
TRIS	Technical Regulations Information System
UHF	Ultra High Frequency
UMTS	Universal Mobile Telecommunications System
UPU	Universal Postal Union
US	Universal Service
USP	Universal Service Provider
VoIP	Voice over Internet Protocol
VSAT	Very Small Aperture Terminal
WAS	Wireless Access System

WGFM
Wi-Fi
WRC

Working Group Frequency Management
Wireless Fidelity
World Radiocommunication Conference



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