

# 2014

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## ANNUAL REPORT



EETT

HELLENIC TELECOMMUNICATIONS & POST COMMISSION





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This Annual Report presents the work, initiatives and actions of the Hellenic Telecommunications and Post Commission (EETT) for the period from January 1<sup>st</sup> to December 31<sup>st</sup>, 2014.

The Hellenic Telecommunications and Post Commission (EETT) is an Independent Administrative Authority. It acts as the National Regulator that monitors, regulates and supervises: (a) the electronic communications market, within which fixed and mobile telephony, wireless communications and Internet access providers operate and (b) the postal services market, within which postal and courier service providers operate. Moreover, EETT is entrusted with the competences to act as the Competition Authority in the said markets.

The Authority was established in 1992 by virtue of L.2075/1992 and was originally named Hellenic Telecommunications Committee (EET) as its competences initially focused on the supervision of the liberalized telecommunications market. It started operating in the summer of 1995. With the enactment of L.2668/1998 that defined the organization and operation of the postal services, EET was also entrusted with the responsibility of supervising and regulating the postal services market and was renamed Hellenic Telecommunications and Post Commission (EETT).

L.2867/2000 enhanced EETT's regulatory, supervisory and monitoring role. By incorporating more recent European regulations, L.3431/2006 on electronic communications defined the framework for the provision of electronic communication networks and services and related facilities in Greece, expanding EETT's competences. L.4070/2012 on electronic communications (as amended by

L.4146/2013 (GG 90/A/18-04-2013) and L.4313/2014 (GG 261/A/17-12-2014)) and L.4053/2012 on postal market and electronic communications matters significantly reinforced EETT's role as the new framework further enhanced its competences including, inter alia, management of the radiofrequency spectrum for terrestrial digital broadcasting, whilst ensuring transparency and effectiveness in a series of matters such as licensing the construction of antennas, market analysis and consumer protection.

EETT is a highly specialized public sector body. However its high level efficiency and effectiveness bring to mind characteristics that are specific to private sector companies, as EETT:

- issues a Balance Sheet and a Profit and Loss Statement,
- finances its own operation,
- possesses an integrated information system for document processing,
- employs high skilled experts and
- sets goals focused in growth and improving the operating conditions for two particularly dynamic sectors of the economy.

EETT's administrative body is the Plenary, which consists of nine members – namely the President, two Vice Presidents competent for the sectors of electronic communications and postal services respectively and six members. All Plenary members enjoy full personal and operational independence in exercising their duties.

According to the existing legal framework (L.4070/2012 in which articles

6(1)6 and 6(1)7 were amended by article 123, par.2 of L.4199/2013<sup>1</sup>), the President and the Vice Presidents are selected and appointed by the Ministerial Cabinet, upon proposal by the Minister of Infrastructure, Transport and Networks<sup>2</sup> and following the opinion of the Parliamentary Commission for Institutions and Transparency. EETT's remaining Plenary members are appointed by the Minister of Infrastructure, Transport and Networks. The appointments of all EETT members are published in the Government Gazette (GG). EETT Plenary members are persons of high status, who enjoy wide public acceptance and are distinguished for their scientific expertise and professional competence in the technical, economic or legal sector. All EETT Plenary members serve a four-year term, while no member can be appointed for more than two consecutive terms.

1. See L. 4199 "Public interurban passenger transport by road – Regulatory Authority for Passenger Transport and other provisions» GG 216/A/11-10-2013.

2. In 2015, the Ministry was renamed to Ministry of Economy, Infrastructure, Shipping and Tourism. However, since the reference year for the present report is 2014, the previous name will be used.



# 2014 PLENARY

**Constantine Louropoulos**

President

**Nikolaos Papaoulakis**

Vice President for the sector  
of electronic communications

**Constantine Delicostopoulos**

Vice President for the sector  
of postal services

**Ioannis Anastassakos**

Member

**Dimitrios Vergados**

Member

**Andreas Lamprinopoulos**

Member

**Spyridon Livieratos**

Member

**Michael Sfakianakis**

Member

**Ioannis Tzionas**

Member

# 2014 PLENARY

## Constantine Louropoulos

### President

Mr C. Louropoulos served as President of the Hellenic Telecommunications and Post Commission from 18-12-2013 to 23-03-2015. Two months before assuming EETT Presidency, Mr Constantine Louropoulos was president and CEO of OPAP SA, a Greek betting company with a turnover of 4 billion euro and one of the largest in the world. His 14-month term at the helm of OPAP came to an end in October 2013, when the Greek State sold its remaining 33% stake in the company to private investors. Before holding public offices, he was involved in the IT sector as an entrepreneur. In 1999, he established a start-up company, called E-ON INTEGRATION SA, which develops and manages software applications in cloud computing technologies, using Internet infrastructure. Mr Louropoulos started his career in 1979 at Arthur Andersen. He then went on to establish the Greek office of Andersen Consulting (currently Accenture) of which he was president and CEO until September 1997. In Andersen Consulting, he was nominated partner in the company's world-wide management team. He also acted as a member of several international management and technical committees, namely South Europe Management Committee, Worldwide Telecom Industry Group, Business Process Management, Financial Services Industry Group, etc. During his long career, Mr Louropoulos has cooperated with large private and state owned enterprises in Greece and internationally. His

main expertise is information technology, business process transformation and change management. He is the author of the book "Kata Laistrygonon – The Business Manifest against the Economic Crisis". Mr Louropoulos was born and raised in Athens. He studied business administration and economics at the Athens University of Economics and Business.

## Nikolaos Papaoulakis

### Vice President for the sector of electronic communications

Dr N. Papaoulakis is an alumnus of the Experimental School of the University of Athens. He received the diploma in electrical and computer engineering from the National Technical University of Athens (NTUA) in 2002 as well as his PhD in 2007. Between 2001 and 2013, he was a senior research associate at the Telecommunications Laboratory of the NTUA School of Electrical and Computer Engineering. He has participated in many European and national research projects as technical manager on topics related to telecommunications and especially mobile-personal communications networks and PC networks. Dr Papaoulakis has published extensively with more than 73 papers in widely recognized international conferences and prestigious scientific journals. Moreover, he was a member of the task force for the production of a technical report for Tactical Ad-Hoc communication systems of NATO and he also participated in the Institute of Electrical and Electronics Engineers (IEEE) working group

for the radio resource management on IEEE 802.11 networks. From September 2009 until the end of 2013 he served as Member of EETT's Plenary.

## Constantine S. Delicostopoulos

### Vice President for the sector of postal services

Dr C. Delicostopoulos has served for nine years as Assistant Professor of Law (Maitre de Conférences) at Université Paris 2 Pantheon-Assas (P.R.E.S. Sorbonne Universités). He also lectured for several years at the Institute of Judicial Studies (I.E.J. "P. Raynaud") of Université Paris 2 and served as chairman of the entrance examinations' committees for the Paris Bar School (E.F.B.). He also served for a year as visiting researcher at Harvard Law School, USA. He holds a Bachelor's degree in law (LL.B.) from the London School of Economics and also a Bachelor's degree in law (Maîtrise) and a Master's degree in law (D.E.A. en droit privé) from Université Paris 2. In 2000 he received his PhD in law (Doctorat en droit) *summa cum laude* from the Université Paris 2. He is admitted to practice as a lawyer before the Supreme Court of Greece and before the Appellate Court in Paris. Among his publications, see indicative S. Guinchard, C. Chainais, C. & I. Delicostopoulos et al., *Droit processuel – Droits fondamentaux du procès*, 8e édition, Dalloz, 2015.

## Ioannis Anastassakos

### Member

Dr I. Anastassakos holds a diploma in electrical and mechanical engineering from the National Technical University of Athens, a DEA and a PhD in statistics from Université Pierre et Marie Curie and a Master's degree in sociology from Université de Paris-Sorbonne. He served as executive advisor at the Ministry of Infrastructure, Transport and Network as well as communication advisor since 2011. Moreover, he has served as managing director and president of AGB Hellas/Nielsen Media Research (1988-2011), whilst he also has longstanding professional experience in important positions in advertising and market research agencies as well as in research centres in Greece and in France.

## Dimitrios Vergados

### Member

Dr D. Vergados is an Assistant Professor in the Department of Informatics at the University of Piraeus. His research interests focus on computer networks and telecommunication systems, cloud computing and green technologies and computer vision. He has several publications in well respected scientific journals, books and conference proceedings. He has served as editor of international journals, program chair in several conferences, member of many technical programme committees, reviewer in journals and conferences and as a committee member and evaluator in national and international committees and organisations.

## Andreas Lamprinopoulos

### Member

Mr A. Lamprinopoulos studied at the School of Mechanical and Electrical Engineering (1955-1960) at the National Technical University of Athens, continued his postgraduate studies in digital technology as scholar in W. Germany (1967-1968) and attended financial education training programs at the Technical Chamber of Greece. His professional career started at OTE, where he advanced to the rank of director. Thereafter, he served at Hellenic Railways Organisation (OSE) as chief and chairman of the Board (1982-1986), general manager (1986-1988) and president (1987-1988). During the years 1988-1989, he served as general manager of the Ionian Bank of Greece, and at the same time as chairman of the OSE Board and vice president of the board at the company "Phosphate Fertilizers", the Commercial Bank of Germany and the shipyards at Neorion of Syros island. From 1990 to 1993, he served as general manager of the consulting firm "GETREN Ltd" and in 1994, he became chairman of the monitoring committee for the EEC modernization programme of OTE. From 1995 to June 2000, he served as EETT's president, afterwards as chairman of the Board of OSE (2000-2003) and until 19-12-2013 as president of the Hellenic Authority for Communication Security and Privacy (ADAE).

## Spyridon Livieratos

### Member

Dr S. Livieratos holds a diploma in electrical engineering and a PhD

in wireless-satellite communications from the National Technical University of Athens (NTUA). Since 2009, he has been Assistant Professor at the Department of Electrical and Electronic Engineering Educators, School of Pedagogical and Technological Education. From 1993 to 1997, he was instructor at the Hellenic Naval Academy and at the Graduate School of Greek Army Technical Officers. His research interests cover a wide scope of telecommunications issues, his publications are extensive and he has participated in many European and Greek research projects as project manager or main researcher. Before 2009 and for many years, he worked in the telecommunications market at various positions, such as sales engineer at SIEMENS, carrier sales manager at OTEGLOBE and head of the telecommunications regulation department at EETT.

## Michael Sfakianakis

### Member

Dr M. Sfakianakis is head of the Department of Business Administration and professor in Informatics for Business Administration of the University of Piraeus since 2000. In the period 1995-2000 he served as research fellow at the Centre of Planning and Economic Research (KEPE) in Greece. Also, he was adjunct lecturer at the Department of Statistics of the Athens University of Economics and Business (1993-2000) and at the Section of Statistics & Operations Research of the Department of Mathematics at the University of Athens (1991-1994). In

addition, amongst other positions he has served as president of the Central Supervisory Board of the General Commercial Registry (2011–today); member of the Coordinating Committee for the Global Project on Measuring the Progress of Societies of OECD; member of the European Advisory Committee on Statistical Information in the Economic and Social Spheres; full member of the Independent Public Procurement Authority; president of the Consumer Price Index Revision Committee of Greece of ELSTAT as well as vice president of the board of directors of Electronic Governance of Social Security (IDIKA) SA.

## **Ioannis Tzionas**

### **Member**

Mr I. Tzionas is a Professor at the University of Macedonia and an attorney at law, registered at the bar of Thessaloniki. He graduated from the Law School of Democritus University of Thrace and pursued post-graduate studies (LL.M) in European Union Law and International Economic Law at the London School of Economics and Political Science and obtained his PhD from the Institute of Advanced Legal Studies of the University of London in the field of International Economic and European Law. Mr Tzionas has specialized in International Economic Law and International Business Transactions, European Union Law, Business Law, inter alia, subjects which he has taught and which form his scientific and research interests.



# 1

## 1.1. Plenary decisions in 2014

In 2014, 41 Plenary meetings were held at EETT, producing a total of 1,552 decisions, related primarily to hearing procedures, electronic communications and radiofrequency spectrum licensing, regulatory electronic communications issues, postal market and administrative issues. A detailed breakdown of EETT's Plenary decisions by subject matter is presented in Chart 1.1.

The agenda of the Plenary meetings as well as EETT's decisions are posted on its website and the "DIA-VGEIA" website. Specifically, decisions related to regulatory acts are published in the Government Gazette.

## 1.2. Internal procedures

During the year, EETT handled thousands of requests, issues and cases. A brief summary of key categories of cases is listed in Table 1.1.

It should be noted that EETT carries out 140 principal procedures, a particularly high number as additional authorities have been added to its competence over the past few years. Each procedure requires its own expertise, experience on the subject, staff with specialised training and customised information systems. Table 1.2 demonstrates the number of EETT procedures.

## 1.3. Financial report

As demonstrated in EETT's Balance Sheet (Table 1.3), in 2014 there was a decrease in assets, due to the significant reduction of reserves, caused by the attribution of 86,393,859.54 euros, standing for 80% of EETT's financial surplus for the years 2012-2013, to the state budget (Table 2.4, p.33, Financial Result and EETT's contributions to the state budget).

The Profit and Loss Statement shows that operating profit has been decreased by 8.23%. This is due to:

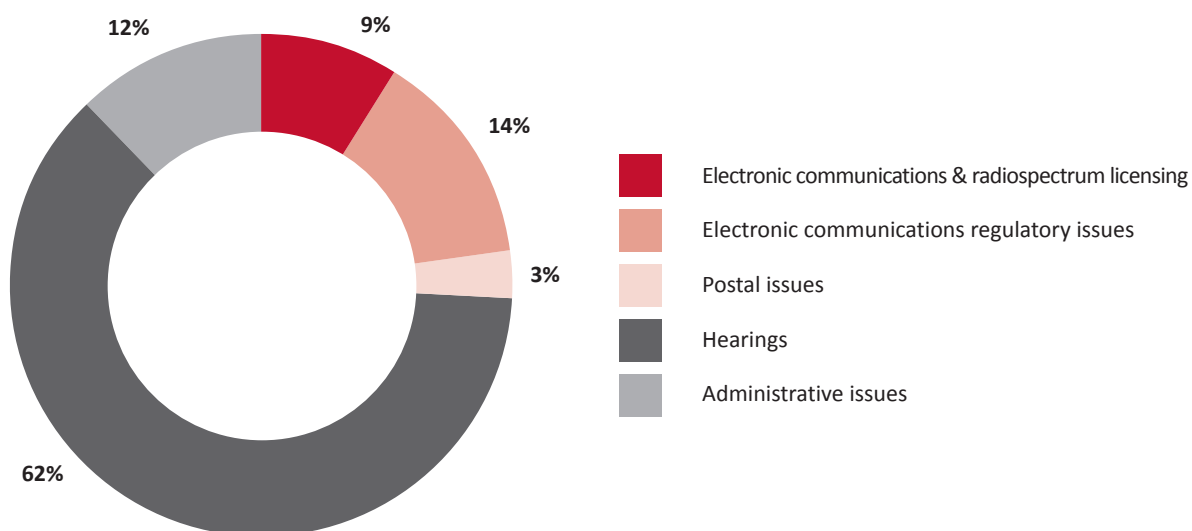
a) a reduction in the turnover (administrative fees and R/F usage fees, numbers) by 4.32% due to the economic crisis' impact on the telecommunications and postal markets;



# EXECUTIVE SUMMARY

In the context of its competencies, EETT undertakes a wide range of actions and interventions in its supervised sectors. In the following paragraphs, the Authority's work for 2014 is summarised with reference to key developments in the supervised markets.

Chart 1.1: EETT Plenary decisions (2014)



Source: EETT



**Table 1.1: Task management by EETT (2014)**

Task category	Number of cases submitted and processed
<b>Consumer Service Sector</b>	
Requests/complaints	10,883
<b>Telecommunications Directorate</b>	
Dominant operator's bundled services for approval	120
General License applications for telecommunications	108
Applications by telecommunications registrars	94
Applications for numbering resources	192
Requests for assignment of domain names with [.gr] suffix	191,721
Checks on providers for portability procedures compliance	20
Checks on providers regarding compliance with their obligations under the General Licenses Regulation and Code of Conduct	188
Checks for damage handling and local loop delivery	30
<b>Spectrum Directorate</b>	
Applications for licensing antennas (for new licences and fulfillment certificates)	1,075
Applications for microwave links (for new licences and modification of existing ones)	1,212
Applications for special radio-networks (for new licences and modification of existing ones)	121
Applications for licensing terrestrial satellite stations	7
Applications for provisional rights	14
Cases related to the supervision of the spectrum of fixed and mobile services & amateur radio services	328
Cases related to the supervision of radio-television	1,058
Inspections throughout the country for supervising radio-television	166
Cases related to the supervision of public networks	44
Cases related to the supervision of mobile telephony antennas	830
Radio and Telecommunications Terminal Equipment (RTTE) sample controls	145
<b>Postal Directorate</b>	
General Authorisation applications for postal services (registration, amendment, expiry)	324
Individual License applications for postal services (registration, amendment, expiry)	9
On-the-spot compliance controls for postal services providers	89



**Table 1.2: Internal procedures per Directorate and Department (2014)**

Directorates/Departments		Number of processes listed
<b>Telecommunications Directorate</b>		
T1	Telecommunications Regulation	16
T2	Telecommunications Monitoring & Supervision	7
T3	Market and Competition Monitoring	9
CSS	Consumer Service Sector	1
<b>Spectrum Directorate</b>		
F1	Spectrum Management	18
F2	Spectrum Monitoring	8
F3	Telecommunications Equipment	12
<b>Postal Directorate</b>		
POST	Postal Services	8
<b>Financial &amp; Administrative Services Directorate</b>		
FIN	Financial & Administrative Services	34
<b>Departments</b>		
LEG	Legal Services	11
PR	Public Relations	10
IT	Information Technology	4
SCR	Plenary Secretariat	2
<b>Total</b>		<b>140</b>



b) a reduction of other operating revenues (fines) by 19.93%. It should be noted that fines are collected via the Public Revenues Collection Code and there are significant fluctuations over the years;

c) a decrease in financial revenues up to 34.83% due to a significant drop in the interest rates of term savings accounts and the significant reduction of EETT's reserves for the reasons mentioned above;

d) a significant increase in the expenses of previous financial years (in reference mainly to fines, which have been significantly reduced and/or cancelled by decisions of the Athens Appellate Court, while a detailed breakdown on their return, is to be expected by the competent tax offices).


e) the calculation of supplementary provisions for pending cases and other extraordinary risks (bad debt).

It should also be noted that EETT once again reduced its overall operating cost by 9.5%, with operating cost decreasing by 9.14% and administrative cost by 12.10%.

Pursuant to the above, the Net Operating Result amounted to 33,180,289.57 euros. Within one month after the adoption of EETT's Balance Sheet, up to 80% (26,544,231.66 euros) of EETT's financial surplus is attributed to the state budget, according to current legislation (L.4070/2012 «Regulation on electronic communications, transport, public works and other provisions» (GG 82/A/2012), pursuant to article 75, par. 6 and 7, as amended with L.4313/2014 "Transport, electronic communications,

public works and other provisions" (GG 261/A/17-12-2014), and decision No 755/020/02-04-2015.

**Table 1.3: EETT balance sheet (2014)**

 <b>HELLENIC TELECOMMUNICATIONS &amp; POST COMMISSION</b> BALANCE SHEET AS OF 31 <sup>ST</sup> DECEMBER 2014 - 20 <sup>TH</sup> FISCAL YEAR (1 <sup>ST</sup> JANUARY - 31 <sup>ST</sup> DECEMBER 2014, AMOUNTS IN EUROS)																																																																																																																									
<b>ASSETS</b>					<b>CAPITAL &amp; LIABILITIES</b>																																																																																																																				
<b>B. ESTABLISHMENT EXPENSES</b>					<b>A. OWNER'S EQUITY</b>																																																																																																																				
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INCOME STATEMENT (PROFIT & LOSS ACCOUNT) FOR THE YEAR ENDED 31 <sup>ST</sup> DECEMBER 2014 (1 <sup>ST</sup> JANUARY - 31 <sup>ST</sup> DECEMBER 2014)					INCOME (PROFIT) APPROPRIATION ACCOUNT																																																												
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Maroussi, 2 April 2015


EETT VICE PRESIDENT	THE FINANCIAL & ADMINISTRATIVE SERVICES DIRECTOR	THE HEAD OF THE EETT ACCOUNTING DEPARTMENT
NIKOLAOS CH. PAPAOLAKIS I.D. No AK 509338	GIORGOS N. ORFANOS I.D. No AZ 095420 ECONOMIC CHAMBER OF GREECE CLASS A REG No 0003970	AGGELIKI H. SPIGGOU I.D. No AB 047533

**CERTIFIED AUDITOR - ACCOUNTANT'S REPORT**  
**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 comprise the Balance Sheet as of December 31st 2014 the Income Statement (Profit & Loss Account) and the Income Appropriation Account for the period then ended. Administration's Responsibility for the Financial Statements. The Administration of the "Hellenic Telecommunications and Post Commission" is responsible for the preparation and fair presentation of the Financial Statements in accordance with the Accounting Standards prescribed by Greek Legislation and Articles 42a to 43c of CL 2190/1920, as well as for designing, implementing and maintaining an internal audit system relevant to the preparation and fair presentation of Financial Statements that are free from material misstatement, whether due to fraud or error. Certified Auditor's Responsibility. Our responsibility is to express an opinion on the above Financial Statements, based on our auditing data. We conducted our audit in accordance with the International Auditing Standards. These Accounting Standards require that we comply with the rules of business ethics and that we plan and perform the audit to obtain reasonable assurance that the Financial Statements are free from material misstatement. An audit involves following procedures for obtaining audit evidence about the sums and disclosures in the Financial Statements. The procedures selected depend on the auditor's judgment, including the assessment of the risk of material misstatement of the Financial Statements, whether due to fraud or error. In making those risk assessments, the auditor takes into account the internal control system which is relevant to the entity's preparation and fair presentation of the Financial Statements, in order to design audit procedures that are appropriate for the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the internal control system of the "Hellenic Telecommunications and Post Commission". An audit also includes evaluating the appropriateness of the accounting policies used and the reasonableness of the Administration's accounting estimates, as well as the overall presentation of the Financial Statements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide the grounds for our audit opinion. Opinion. In our opinion, the above Financial Statements give a true and fair picture of the economic situation of the "Hellenic Telecommunications and Post Commission" as of December 31<sup>st</sup> 2014 and of its financial performance for the year then ended, in accordance with the Accounting Standards prescribed by Greek Legislation and Articles 42a to 43c of CL 2190/1920. Report on other legal and regulatory requirements. The content of EETT's President's report to the Plenary regarding the Annual Report is consistent with the accompanying Financial Statements.

Athens, 3 April 2015  
THE CERTIFIED AUDITOR - ACCOUNTANT

MAKRIS KONSTANTINOS  
ICPA REG NO 26771

 MAZARS  
Mazars Chartered Accountants  
Business Consultants SA  
130 Syngrou Avenue, 176 71 Athens  
ICPA REG NO: 154



## 1.4. Human resources

EETT handles cases that are characterised by high level of expertise and uniqueness, so several different disciplines must work together to settle a case. To meet these needs, EETT's staff has exceptionally high academic qualifications in a range of disciplines and scientific fields. It is worth mentioning that the majority of personnel – almost 59%– are holders of post-graduate degrees.

Even though the number of competencies assigned to EETT continues to increase, staff remained stable over the past seven years. At the end of 2014, EETT's employees numbered 218.

However, personnel has to be increased by staff transfer or new hirings of people who have the required educational qualifications as well as market experience. These people will be called upon to become directly incorporated and work in order to meet the ever increasing and more complex needs of EETT-aiming at the smoother operation of the supervised markets.

In any case, staffing EETT is a very complicated process, given the requirements in educational qualifications as well as the fact that hiring new employees into its productive force is a time consuming process. As referred to 2013 Annual Report, there has to be a plan for systematic knowledge transfer, so that all of EETT's accumulated intellectual resources can be trans-

mitted to new employees. For this reason, in 2014 EETT, based on its own sources, developed business intelligence technologies, and updated Intranet, as described in Section 3.4.3.

Since unremitting information and training on specificity and competence issues is required, EETT's staff participates annually in a variety of educational activities, including inter alia, internal training seminars and participation in international conferences, seminars and workshops. Also, in an effort to continuously improve working environment and conditions, EETT offers technical safety and occupational physician services.

## 1.5. Overview of the supervised markets

### 1.5.1. The electronic communications market

#### Globally

During 2014, the use of information and communication technologies kept on growing mainly due to mobile broadband penetration while the traditional services of mobile and fixed telephony (including fixed broadband access) have reached a certain saturation level. The increase of the Internet usage and the availability of online content has especially intensified mainly due to the applications and the social networks' platforms. However, the digital divide tends to widen, especially between developed and developing countries as well as between urban and rural areas.

The International Telecommunication Union (ITU) in its recent study<sup>3</sup> summarises the basic developments in the world market as following:

- Fixed telephony penetration is on a continuous decline and during 2014 was reduced by 2%. The decrease was stronger in developed countries (2.4%).
- In 2014, fixed-broadband subscriptions will reach a total of 771 million globally, corresponding to a penetration rate of almost 10%.
- Mobile telephony presents a decelerating growth and in 2014 mobile penetration increased only by 2.6% which is a ten-year low indicating that the market reaches saturation levels.
- 44% of the world's households is estimated to have Internet access. In Europe the respective figure is 78% and has reached a saturation level.
- Mobile broadband remains the fastest growing market segment with an estimated global penetration of 32%. The respective figure for the developed countries is estimated at 84%.
- The continuous growth of Internet content especially via the social media is of particular interest. In 2014 Facebook has grown to comprise 1.3 billion active users and Twitter (has grown to comprise) 646 million active users. YouTube boasted more than 1 billion unique visitors monthly that watch more than 6 billion hours of video.

3. ITU «Measuring the Information Society Report 2014».

Deloitte, in its report<sup>4</sup> about the main trends in the world market of Technology, Media and Telecommunications (TMT) for 2014, predicts that the sales of wearable devices (smart glasses, watches and wristbands) will reach 10 million units in total and that 50 million households will double up on pay-TV driven mainly by premium sport rights. At the same time, the sales of phablets (big screen smartphones that can be used as mobile devices and as tablets) is estimated to exceed by 25 billion US dollars the respective sales of tablets. The total global sales of smartphones, tablets, PCs, TVs and video game consoles for 2014 is estimated to be over than 750 billion US dollars, while smartphones, namely the largest component of the connected devices (375 billion US dollars revenue in 2014) are nearing saturation among most age groups, although there is still a prime opportunity among people older than 55 years old. Furthermore, it is estimated that sectors such as eVisits, Massive Online Open Courses (MOOCs) and Near Field Communication (NFC) technologies (contactless payments via mobile phone) will present a fast-growing trend.

## Europe

According to the European Information Technology Observatory (EITO)<sup>5</sup>, mobility (devices, applications, services), cloud computing (in private and public sector), big data analytics and social media will be the main technological

trends that will set the tone for the European ICT market for the period 2014-2015. These technologies, often referred to as «Third Platform», have developed a certain intense momentum that is evident during the last years and is expected to lead the growth of the European market in the period that follows. What is more, in certain European markets those technologies are expected to be the most basic form of business activity in the ICT market with high growth rates and basically replacing the “traditional” technological expenditure that will gradually shrink due to the technological and economic developments and conditions.

Also, the latest report of the European Commission for the electronic communications in Europe<sup>6</sup> notes that (based on data as of January 1, 2014):

- 97% of the European population is covered by fixed broadband networks, while 62% is covered by New Generation Access Networks (NGA) that allow broadband connection to Internet at download speeds over 30 Mbps.
- The market of Internet broadband connection (via fixed networks) has grown to comprise over 150 million connections that correspond to a penetration rate of 30%. However, the connections’ penetration at speeds over 100 Mbps has merely reached 1.6%.

- The mobile broadband coverage amounted to 97% while the mobile broadband penetration reached 61%.

In the context of the continuous effort for strengthening the market and in accordance with the goals of the “Digital Agenda 2020”, the European Commission has proceeded to a series of legislative initiatives. The regulation draft for the Single Telecoms Market is already in an advanced stage of negotiation, while a broad and particularly ambitious initiative for the Digital Single Market has already been announced and is expected to be placed under public consultation in the summer of 2015 examining subjects regarding the function of the electronic communications market, placing greater emphasis on the European Regulatory Framework as well as broader projects (digital copyright, security issues etc.).

## Greece

The integration of fixed to mobile telephony is gradually taking place in every major telecommunication market as well as in Greece. First WIND (by integrating TELLAS) and since 2014, VODAFONE (having recently acquired HELLAS ON LINE) are now able to offer fixed telephony services bundled with mobile and other services and to directly compete with OTE-COSMOTE. At the same time, CYTA HELLAS is in position to offer quad play services by operating as Mobile Virtual Network Operator (MVNO).

4. Deloitte – 13<sup>th</sup> report «Technology, Media & Telecommunications Predictions - 2014».

5. European Information Technology Observatory (EITO) «Key Technology Trends in Europe 2014/15».

6. Implementation of the EU regulatory framework for electronic communications 2014.



The provision of pay-TV services via satellite or IP technology is expected to be the key growth factor for the fixed telephony operators. In the period from 30-06-2013 to 30-06-2014, 250,000 new clients were added to the operators' subscriber base with the increase being particularly obvious for the satellite pay-TV. Leading operators provide those services usually bundled with fixed telephony or fixed broadband access services. It should be noted that as of 30-06-2014, the subscribers for pay-TV via satellite or IP technology reached 820,000. Respectively, a key growth factor for the mobile operators is the development of the mobile broadband market. At the end of 2014, the active subscribers with mobile broadband amounted to 2.35 million.

The size of the Greek telecommunication market in 2014 is estimated to have further shrunk by 3% compared to 2013, amounting to approximately 5.24 billion euros<sup>7</sup>. It is noted that the market size amounted to 5.4 billion euros in 2013 and to 5.92 billion euros in 2012. The fixed lines number was reduced to 4.78 million compared to 5.3 million in 2010. In the midst of 2014, OTE's share in the fixed telephony access market was reduced to 58% compared to 60.9% in the respective period of 2013. As far as mobile telephony is concerned and based on 2014 data, the number of subscriptions amounted to 17.5 million connections, out of which 13 million were active.

Broadband penetration reached 28.5% compared to 26.3% at the end of 2013, corresponding to 3,155,986 connections compared to 2,913,191 at the end of 2013. Bundled services are the leading products in the telecommunications market, offered at affordable prices due to the fierce competition among the telecommunication operators. In December 2014, the double play subscribers amounted to 2,885,736 and the triple play subscribers were 171,873 compared to 2,697,430 and 152,293 respectively in December 2013. The IPTV and VoD penetration is limited as suggested by the number of triple play subscribers. As far as the mobile broadband, the 2G population coverage reaches 99.8%, the 3G reaches 99% while the respective figure for 4G is 70%. As of December 2014, 2,330,274 subscribers used mobile broadband via mobile phone or any other device.

Fixed and mobile number portability decreased by 4.6% compared to 2013, registering, however, over 1 million of ported fixed and mobile numbers. Mobile termination fees were further reduced by 6% and now stand at 1.189 eurocents compared to 1.269 eurocents of 2013, while a new reduction by almost 7% is about to be introduced on 01-01-2015, thus setting the fees at 1.103 eurocents.

### **1.5.2. The postal services market**

#### **Globally**

According to the International Post Corporation (IPC), in the

first half of 2014, the revenues of the global postal market were increased by 2.3%. This increase is mainly attributed to parcels' volume boost due to the worldwide e-commerce increase in sales and also to postal service providers' intensive effort for diversification of their activities.

Specifically, parcels and express mail revenues were increased by 4.8%, as compared to the first half of 2013, whilst traditional post revenues remained stable.

Aiming to respond to new trends and needs, the postal service providers seek to revitalize their companies and upgrade their processes through the provision of added value services to customers, including track and trace systems, shipping to predefined place and time, easy return processes, hybrid mail services etc.

#### **Europe**

During the last decade, the EU postal market has rapidly proceeded with the liberalization of the sector, while the Regulatory Authorities of the member states promote competition along with the modernization and improvement of the provided services for the benefit of the customer. The substitution of the electronic mail in conjunction with the hard economic contingency of the recent years forced down the numbers of the postal European market, where, according to PostEurop, employment has been reduced

7. The data is based on estimations since the financials of some operators were not available during the period that EETT's Annual Report for 2014 was compiled.

by 30% in the last decade, as it is estimated that 375,000 jobs have been lost. At the same time, e-commerce market grows rapidly, providing new opportunities to postal service providers.

The situation in the postal market varies to a large extent among the member states towards competition intensity and towards electronic substitution, digitalization and maturity of e-commerce. In order to achieve the future goals and ensure the access of all citizens to up-to-date and low cost postal services, the postal market should continue to invest in infrastructure, encourage novelty and improve the quality of the provided services.

### Greece

In Greece, the postal sector follows the same negative trend, which dominates almost all the economic sectors, presenting, however, lower reduction rate in 2014 as compared to previous years (Chart 1.2).

In the Greek postal market, in 2014, 365 companies were active under General Authorisation and 11 companies with Individual Licence, excluded ELTA, versus 389 and seven respectively in 2013. It is worth mentioning that ELTA, according to L.4053/2012, remains the Universal Service Provider (USP) until 2028. The increase in the number of companies with Individual Licence is mostly due to the full liberalization of the postal market since 01-01-2013.

### 1.6. Overview of EETT's actions in 2014

Given the adverse economic environment in Greece, EETT under-

took in 2014 an extensive number of actions and initiatives, focusing on the safeguarding of sound competition in the market to the benefit of the consumer. The most important interventions are summarised as follows:

As regards consumers, EETT proceeded to:

- *Continue the operation of the Consumer Service Sector (CSS):* In 2014, CSS handled 10,883 written requests and complaints, of which 85.87% concerned mobile telephony, fixed telephony or Internet services, 12.59% concerned the radio spectrum and 1.54% postal services.
- *Impose to mobile operators the obligation to deactivate stolen devices:* Following EETT's decision, all providers are obliged to deactivate stolen devices via IMEI (International Mobile Equipment Identity) to protect consumers against mobile phone theft.
- *Systematically inform consumers regarding electronic communications services and postal services:* EETT issued recommendations and announcements on topics such as the use of Multimedia Information Services (MIS), the selection criteria for telephony and Internet services, the terms regarding postal items distribution etc.

In the electronic communications sector, EETT proceeded to:

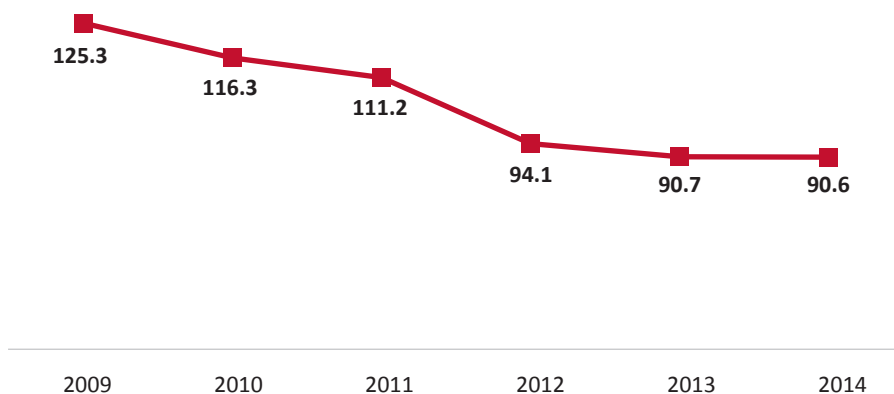
- *Strengthen the roll-out of Next Generation Networks:* EETT amended parts of the wholesale line rental reference offer of OTE by including procedures for the

wholesale provision of virtual partial unbundled loop (VPU). At the same time, it proceeded with the consultation of the collocation Regulation draft on the obligation to provide collocation and the joint use of network related facilities when rolling out high-speed broadband electronic communication networks in order to avoid related investment overlaps.

- *Reduction of the roaming wholesale and retail price caps:* The reductions range from 20.8% (outgoing voice call) to 55.6% (data download) and were carried out in the context of implementing the new European Regulation on international roaming. It should be mentioned that EETT amended the General Authorisation Regulation regarding the regulated international roaming services, obliging any operator who wishes to operate as an alternative roaming provider, to have a General Authorisation.
- *Analysis of interconnection markets:* EETT completed the market analysis for the interconnection markets concluding that the level of effective competition is still considered insufficient and designated OTE as an operator with significant market power (SMP) in the markets of call origination and termination to its network. At the same time, every operator that provides wholesale termination services is a SMP operator as far as its network is concerned.
- *Universal Service issues:* EETT submitted its recommendation to the Ministry of Infrastructure,



**Chart 1.2: Index for turnover evolution for the postal market (base year 2005)**



Source: EL.STAT.

Transport and Networks regarding the determination of the reasonable request via wireless technologies, which will significantly reduce the cost of Universal Service, and placed under public consultation the tender document under the title “Auction for the selection of the Universal Service provider”.

- *OPE compliance control*: EETT concluded OTE’s compliance control regarding its obligations for price control/cost accounting/accounting separation of regulated services both at wholesale and retail level.
- *Development and operation of the web application “Preliminary Test Module (PTM)”*: This application allows for OTE to conduct a preliminary audit of its bundled services and enables alternative operators to examine the replicability of those programs. Furthermore, this application benefits considerably transparency and the improvement of market operation.

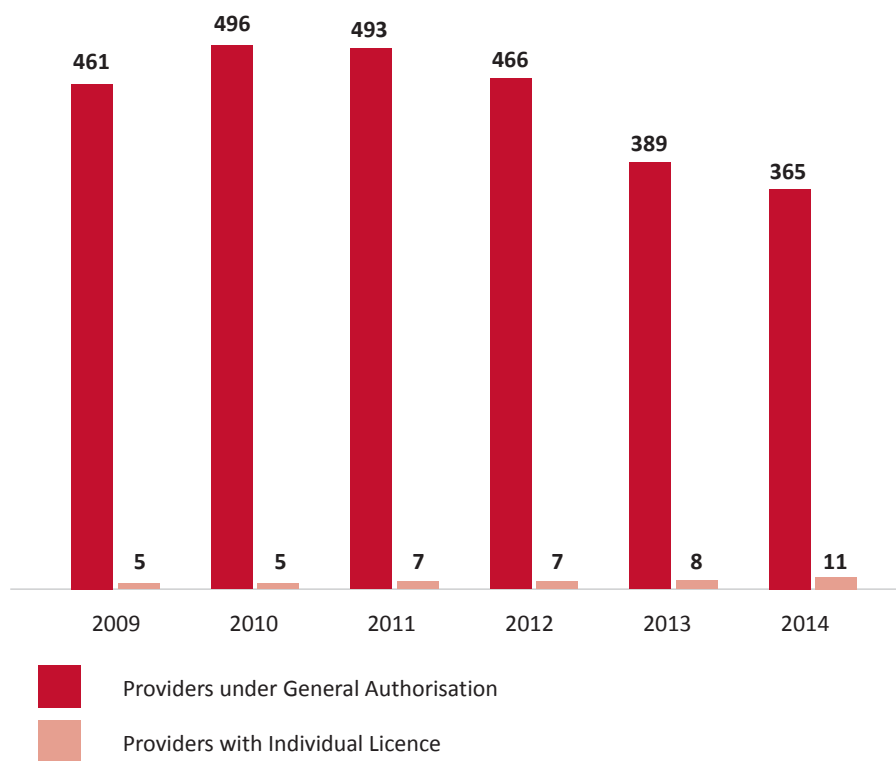
- *New Regulation on number portability*: The new Regulation speeds up the time needed for examining and approving the portability applications and limits the reasons for rejection. It should be mentioned that also for 2014 the ported fixed and mobile numbers have steadily exceeded 1 million. At the same time, the launch of the new website for the number portability ([numberportability.gr](http://numberportability.gr)), allows for the operators to electronically submit their connection requests to the National Reference Database for Portability (NRDP) and enables consumers to find each phone number’s operator.
- *Supervise and improve the quality indicator data*: These data are submitted by domestic operators and regard the quality of fixed telephony network services, fixed broadband services (xDSL) and VoIP services, as well as customer care services (order reception, fault reception etc).

It is worth mentioning that the average download speed has improved considerably, while customer care meets high quality standards.

- *Network integrity in cases of emergency*: EETT submitted its recommendation to the Ministry of Infrastructure, Transport and Networks regarding the determination of the minimum requirements that must be met by those operators that provide fixed phone services to end customers via public communication networks in order to ensure on the one hand the maximum possible availability of those networks in cases of emergency or force majeure and on the other hand the uninterrupted access to emergency services.
- *Audits and hearings*: EETT performed 240 on-the-spot inspections on the implementation of the number portability Regulation in the operators’ facilities, of the Regulation on General



**Chart 1.3: Number of postal service providers (2009-2014)**



Source: EETT

Authorisations and of the Code of Practice in local stores of the fixed and mobile operators and inspected OTE's local exchanges for matters related to the delivery of local loops and the management of their faults. Within 2014, EETT also held 57 hearings on issues pertaining to electronic communications, imposed one fine and made one recommendation while there was 55 other sanctions/decisions.

In the radiofrequencies spectrum sector, EETT proceeded to:

- *Licensing of digital terrestrial broadcasting services:* EETT completed the tender process for granting the television channels for digital terrestrial broadcasting, paving the way for analog

television switch off and freeing up a significant part of the radio spectrum (digital dividend). The relevant tender was completed on 07-02-2014. The company under the name "Digital Broadcasting Telecommunications Services Provider Société Anonyme", and under the title "DIGEA-Digital Operator SA", was the only bidder and as a result, the rights for the national network and the regional networks were awarded, for the consideration of 18.6 million euros. The gradual activation of the 155 out of 156 broadcasting sites, with the parallel phasing out of the analog broadcasts, was completed on 21-02-2015, with a deviation from the predefined date (29-12-2014), for which DIGEA has been called to a hearing

by EETT. It should be noted that the last broadcasting site has not been activated yet, since there have been resident's reactions to its operation. In the areas where the switchover was completed within 2014, EETT carried out measurements and recordings for the population coverage and the ability to receive digital television signal. Measurements will continue in 2015.

- *Licensing in the 800MHz (digital dividend) and the 2.6GHz bands:* EETT carried out the tender process for granting of new rights to use radiofrequencies in the 800MHz and the 2.6GHz bands, concluding the project of granting the digital dividend. It should be noted that this was the biggest



-in terms of available spectrum-granting of rights to use radiofrequencies for the development of mobile networks in Greece. The tender, in which the companies COSMOTE, VODAFONE-PANAFON and WIND participated, was completed on 13-10-2014 and the total consideration amounted to 381.1 million euros.

- *Licensing of electronic communications broadband networks in the 3.4–3.8GHz band:* EETT completed, in March 2014, the tender process for granting new rights to use radiofrequencies in the 3.6-3.8GHz band, together with the renewal of the rights in the 3.4-3.6GHz band, out of which one right expires in 2015 and the remaining three in 2016. Only one company (OTE) participated in the process and as a result there was no auction. One spectrum block in the 3.4-3.6GHz band was awarded to OTE for a consideration of 2.54 million euros.
- *Further development of the Electronic System for the Antenna Construction Application Submission (SILYA):* SILYA, which operates since 2012 is a valuable e-governance tool and a prerequisite for the implementation of the one-stop shop that improves the antenna construction licensing process. During 2014, SILYA was expanded and a total of 1,571 EETT decisions for antenna construction licenses and compliance certificates were issued.
- *Development of a system for measuring and presenting electronic communications indicators:* The measurements that

will concern connection quality features – such as the coverage area and the “actual” connection speed in geographical areas and locations nationwide – will be published through a Geographic Information System (GIS) on EETT’s website. EETT signed an implementation contract for the project which is financed by the NSRF and is expected to be completed within 2015. Also, EETT prepared a study of international practices in measuring electronic communications quality indicators.

- *Granting of rights to use radiofrequencies for fixed, mobile and satellite service:* EETT granted or amended 1,212 fixed service rights of use radiofrequencies, 95 mobile service rights of use and 13 satellite service rights of use.
- *Monitoring of radio-television:* EETT checked 1,058 cases concerning interference, illegal broadcasts and illegal stations and antennas, enforcing in all cases the appropriate sanctions.
- *Radio and Telecommunications Terminal Equipment (RTTE):* In 2014, EETT performed 145 inspections, with the purpose of protecting users and legal networks from harmful interference. In parallel, EETT actively participated in international initiatives such as the EU campaign for inspections of mobile telephone repeaters, which are widely available in the European market.
- *Hearings:* EETT held 624 hearings, as a result whereof, 488 fines and two other penalties were imposed, 127 recommen-

dations were made, whilst seven cases were dismissed.

Regarding postal sector, EETT’s activities are summarized as follows:

- *Regulation on the access to public postal network:* the regulation defines the terms and conditions for the access of postal service providers with Individual License to USP network.
- *Regulation on the delivery of Universal Service (US):* The regulation sets the conditions for the delivery of postal items weighing less than 20 kg, included in the US, whereas the category of small packets and the terms for their handling are defined for the first time.
- *Public tender announcement for the selection of the contractor for the approval of the new cost accounting system of ELTA:* EETT announced public tender in order to select the contractor for the provision of consulting services in specialized issues regarding the evaluation and the approval of ELTA new cost accounting system. The tender was awarded in December 2014.
- *Process of Universal Service quality measurements:* According to US quality measurement results, delivery of domestic first priority mail within one working day from the day of deposit was achieved by 87.3% and delivery within three working days from the day of deposit was achieved by 99.6%, all within the context of US obligation.
- *Decision on the implementation and operation of a platform for*

*the monitoring of postal services' retail prices, in the Greek market:* The decision defines the rules for the implementation and operation of an integrated web system for the electronic collection and provision of postal services' retail prices and other features to consumers, which enables the end-users to compare and evaluate the postal services based on specific criteria.

- *Study on e-commerce:* EETT decided to conduct a study on parcel delivery services, taking under consideration the international trends and developments of the sector and proposing actions for the further development of e-commerce in Greece. The results of the study are expected in 2015.
- *Annual study on the postal market:* The study presents the evolution of the Greek postal market in 2013 through the analysis of the financials and the competition in the sector.
- *Application development for the electronic fee payment by the postal service providers:* EETT's web-based application enables postal service providers to make electronic fee payment as well as to attach the necessary documents.
- *Control and monitoring actions:* EETT conducted 89 on-site audits to postal service providers, whereas 15 companies were summoned to hearings for postal issues.

As regards international relations, EETT:

- Developed an extensive activity at European and interna-

tional level by participating in the works of international organizations and associations, pursuing harmonization of Greece's positions with the international developments and also acquiring specialized knowhow to address the increasingly complex regulatory issues.

# 2

## 2.1. Revenues

EETT's revenues originate from collecting administrative fees usage fees and fines. According to the legislation in force, the above fees cover EETT's total administrative expenses.

Specifically, pursuant to the relevant Laws<sup>8</sup> and the respective Regulations, EETT collects fees for:

- General and Individual Licenses for electronic communications and postal services network providers.
- Assignment and use of numbers.
- Allocation and use of radiofrequency rights.

- Granting rights of private mobile radio networks.
- Assignment of domain names.
- Antenna mast construction licenses.

It is also noted that, EETT, in the context of its monitoring responsibilities, imposes fines to providers of electronic communications and postal services that breach their legal obligations, which are either paid directly to EETT or collected in accordance with the stipulations of the Code for the Collection of Public Revenues<sup>9</sup>. Particularly, the total amount of fines collected by EETT since 2006 to date, amounts to

105,836,035.38 euros (Table 2.1).

Besides the aforementioned fees and fines, EETT's total operational revenues include also the financial income accrued by the effective management of its reserves and the collection of late payment interest, as presented in more detail in Table 2.2.

## 2.2. Expenditure

In 2014, EETT's operating cost amounted to 13,408,135.69 euros, resulting primarily from wages, fees and expenses paid to collaborating companies (e.g. for trade studies), accommodation costs and other expenses. It should be noted that EETT's total

8. L.4070/2012 (GG82/A/10-04-2012), L.2668/1998 (GG 282/A/18-12-1998).

9. Decision 1104800/5972/0016 of the Minister of Finance (GG 2198/B/22-12-1999).



# ANNUAL FINANCIAL REPORT

As a National Regulatory Authority, EETT's administrative and financial independence, which is ensured by the collection of fees payable by the liable companies–bodies and auction proceeds, guarantees the efficient performance of its competences. EETT's revenues constitute state revenues. According to L.4313/2014 (GG 261/A/17-12-2014), the Authority attributes 80% of its annual financial surplus to state budget annually (and not biennially as before), subtracting administrative expenses. In accordance with article 60 par.8 L.4313/2014, EETT will contribute to state budget the amount of 114 million euros, which consists its surplus for the years 1995-2015. Until today, EETT has contributed an amount of approximately 1.5 billion euros.

**Table 2.1: Fines collected by EETT (in million EUR)**

Year	Collected amount
2006	7.4
2007	4.9
2008	21.5
2009	3.9
2010	29.2
2011	5.4
2012	19.0
2013	8.6
2014	5.9
<b>Total</b>	<b>105.8</b>

Source: EETT

**Table 2.2: Financial income (in million EUR)**

Year	Collected amount	Late payment interest
2006	3.6	0.144
2007	5.6	0.063
2008	8.7	0.060
2009	5.6	0.065
2010	8.5	0.572
2011	13.7	0.183
2012	13.1	0.580
2013	10.1	0.081
2014	5.9	0.454
<b>Total</b>	<b>74.8</b>	<b>2.202</b>

Source: EETT

*Note: The considerable variations in the above collected amounts are due to the large time lag between the time of submission, the court proceedings and the collection of the fines as well as to large fines imposed in exceptional cases.*



operating cost has been reduced by 34% in the seven year period of 2008-2014 (Table 2.3) despite the fact that the Regulatory Authority is continuously undertaking new competences.

Expenses are annually budgeted by EETT's Directorates and Departments and approved by the Plenary. All expenses are audited in accordance with the provisions of EETT's Financial Management Regulation<sup>10</sup> and the Expenditure Management Directive<sup>11</sup>.

Budget goals and execution are monitored periodically by the respective Directorates and Departments, whilst EETT's financial management is audited annually by the Body of Chartered Auditors and the ex-post control of the Court of Auditors (the 2013 audit has already been completed and audit conclusion is expected).

### 2.3. EETT's contribution to the state budget

From 2000 until today, EETT has contributed approximately the amount of 1.5 billion euros, due to annual financial surplus and auction yields, to state budget and Hellenic Republic Asset Development Fund.

Analytically:

Up to 80% of EETT's annual financial surplus accrued when subtracting total expenses from the above revenues is being conveyed annually to the national budget, as state revenue<sup>12</sup>. EETT pays the balance of its surplus to the reserve account for expenses of the Secretariat General of Communications of the Ministry of Infrastructure, Transport and Networks by virtue

of the Minister's decision (indicatively listed are expenses such as surveys, conferences, business trips, subscriptions, etc.).

For the two-year period 2012-2013, EETT contributed to the state budget, the amount of 86,393,859.54 euros in May 2014 and therefore the total contribution to date, through the Authority's surplus, reaches the amount of 434,884,578.15 euros (Table 2.4).

**Table 2.3: EETT's total operating cost (in million EUR)**

Year	Total cost
2008	20.3
2009	19.4
2010	17.7
2011	15.8
2012	14.4
2013	13.8
2014	13.4

Source: EETT

10. GG 1391/8/22-10-2001.

11. GG 1701/8/18-12-2001.

12. As set forth in par.6 of art.75 of L.4070/2012, amended by art.6 of L.4313/2014 (GG 261/A/17-12-2014).

**Table 2.4: EETT's financial result and contributions to the state budget (in million EUR)**

Year	Net results	Contributions of reserves to the state budget	
		Amount contributed	Time of contribution
2000	67.8		
2001	17.8		
2002	27.4		
2003	25.0	110.5	January 2006
2004	23.0		
2005	26.0	39.2	July 2006
2006	33.4		
2007	30.3		
2008	54.2	51.0	May 2008
2009	34.8		
2010	50.5	71.2	May 2010
2011	45.2		
2012	71.8	76.6	May 2012
2013	36.6		
2014	33.5	86.4	May 2014
<b>Total</b>		<b>434.9</b>	

Source: EETT

**Table 2.5: EETT's contribution to the state budget (auction proceeds) (in million EUR)**

Auction proceeds (frequencies allocation)	Amount	Time
3 <sup>rd</sup> UMTS / 2 <sup>nd</sup> DCS / GSM	644.1	August 2001
TETRA	2.8	July 2002
E-GSM	37.9	July 2002
Fixed wireless access at 3.5GHz	16.2	July 2006
Radiofrequency rights in 900MHz and 1.8GHz bands	316.9	November 2011
Radiofrequency rights in 3.4-3.8GHz bands	2.4	April 2014
Radiofrequency rights for terrestrial digital broadcasting	5.1	July 2014
Radiofrequency rights in 800MHz and 2.6GHz bands	114.3	October 2014
<b>Total</b>	<b>1,139.2</b>	

Source: EETT

# 3

## 3.1. Human resources

Even though the number of competencies assigned to EETT have been significantly increased, the number of staff remained stable over the past seven years. At the end of 2014, EETT employed 218 people, as compared to 214 in 2013. Out of them, 207 were employed on a permanent basis, five were external associates served for a three-year term as directors or department heads, three were seconded police officers engaged in spectrum monitoring and three were trainee lawyers, engaged in legal department. The evolution of EETT human resources and the number of employees per staff category is demonstrated in Table 3.1.

**Table 3.1: Staff categories (2010-2014)**

Staff category	2010	2011	2012	2013	2014
Scientific experts	106	108	105	105	107
In-house lawyers	0	0	7	7	7
Regular staff (Contracts governed by public and private law)	98	98	100	99	98
Seconded staff	3	3	2	3	3
Temporary staff/Trainees	0	0	3	0	3
External associates	17	10	0	0	0
<b>Total</b>	<b>224</b>	<b>219</b>	<b>217</b>	<b>214</b>	<b>218</b>

Source: EETT





# INTERNAL ORGANISATION

The continuous improvement of the operational capacity remains a top priority for EETT since it is a prerequisite for effectively meeting the ever increasing responsibilities. Based on the highly trained staff and the resources available, the Authority continually undertakes new initiatives and actions to improve its internal organization and efficiently use its technological means to the benefit of consumers and the market.

Since 2000, when EETT was established, it has made systematic efforts to be fully staffed by publicising employment openings, both for scientific experts and for regular employees, following the respective procedures. As shown in Table 3.1, in 2010 there was a significant increase in EETT staff, both scientific and regular, particularly through the transfer of administrative personnel from the former Olympic Airlines; respectively, the number of external collaborators decreased dramatically and, in 2012, when the new staff had been fully incorporated into EETT, that number fell to zero. In 2014, a procedure to fill positions was held for 14 directors' and department heads' positions in accordance with tender 1/2014

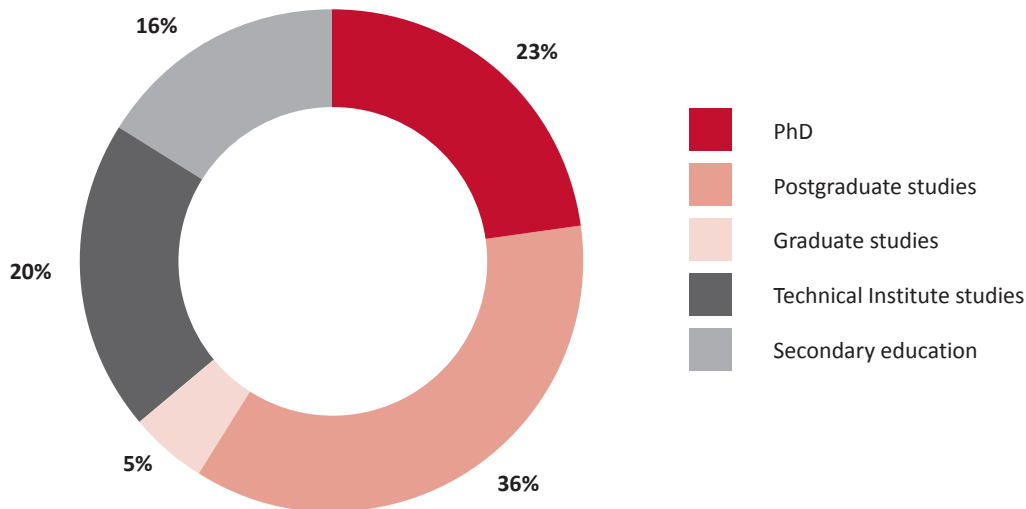
and respective EETT's Plenary decisions. Five of the 14 vacancies, were covered by external executives for a three-year term.

### 3.2. Level of education

As shown in Chart 3.1, 84% of personnel are university graduates, while 59% are holders of post-graduate degrees. EETT requires a mix of disciplines in almost every issue within its jurisdiction. Table 3.2 records the composition of the Authority per field of expertise and per organisational unit.



**Chart 3.1: Educational level of EETT staff (2014)**



Source: EETT

**Table 3.2: Review of fields of expertise & number of employees per department (2014)**

Expertise / Organisational unit	Secretariat to the Plenary	Telecommunications Directorate	Spectrum Directorate	Postal Directorate	Administrative & Financial Services Directorate	Legal Department	Public Relations Department	IT Department	Total per field of expertise
1 President's office	3	0	0	0	0	0	0	0	3
2 Directors	0	1	1	1	1	0	0	0	4
3 Department Heads	0	3	3	2	1	1	1	1	12
4 Engineers	0	16	58	0	0	0	0	0	74
5 Physicists	1	5	4	0	0	0	0	0	10
6 Economists	0	6	0	2	0	0	0	0	8
7 Cost Analysts	0	4	0	3	0	0	0	0	7
8 Business Administration	1	2	0	2	0	0	0	0	5
9 Public & International Relations	0	0	1	0	0	0	5	0	6
10 Information Technology	0	2	1	0	0	0	0	6	9
11 Statisticians	0	1	0	2	0	0	0	0	3
12 Accountants	0	0	0	0	6	0	0	0	6
13 Legal	1	0	0	0	0	15	0	0	16
14 Administrative (university education)	2	0	2	1	1	0	0	0	6
15 Administrative (technical education)	1	2	2	0	6	0	1	0	12
16 Administrative (secondary education)	0	5	0	0	11	0	0	0	16
17 Secretarial (administrative staff of university education, technical education, secondary education)	2	1	2	1	0	2	0	0	8
18 Drivers, police officers etc.	0	0	13	0	0	0	0	0	13
<b>Total per organisational unit</b>	<b>11</b>	<b>48</b>	<b>87</b>	<b>14</b>	<b>26</b>	<b>18</b>	<b>7</b>	<b>7</b>	<b>218</b>

Source: EETT

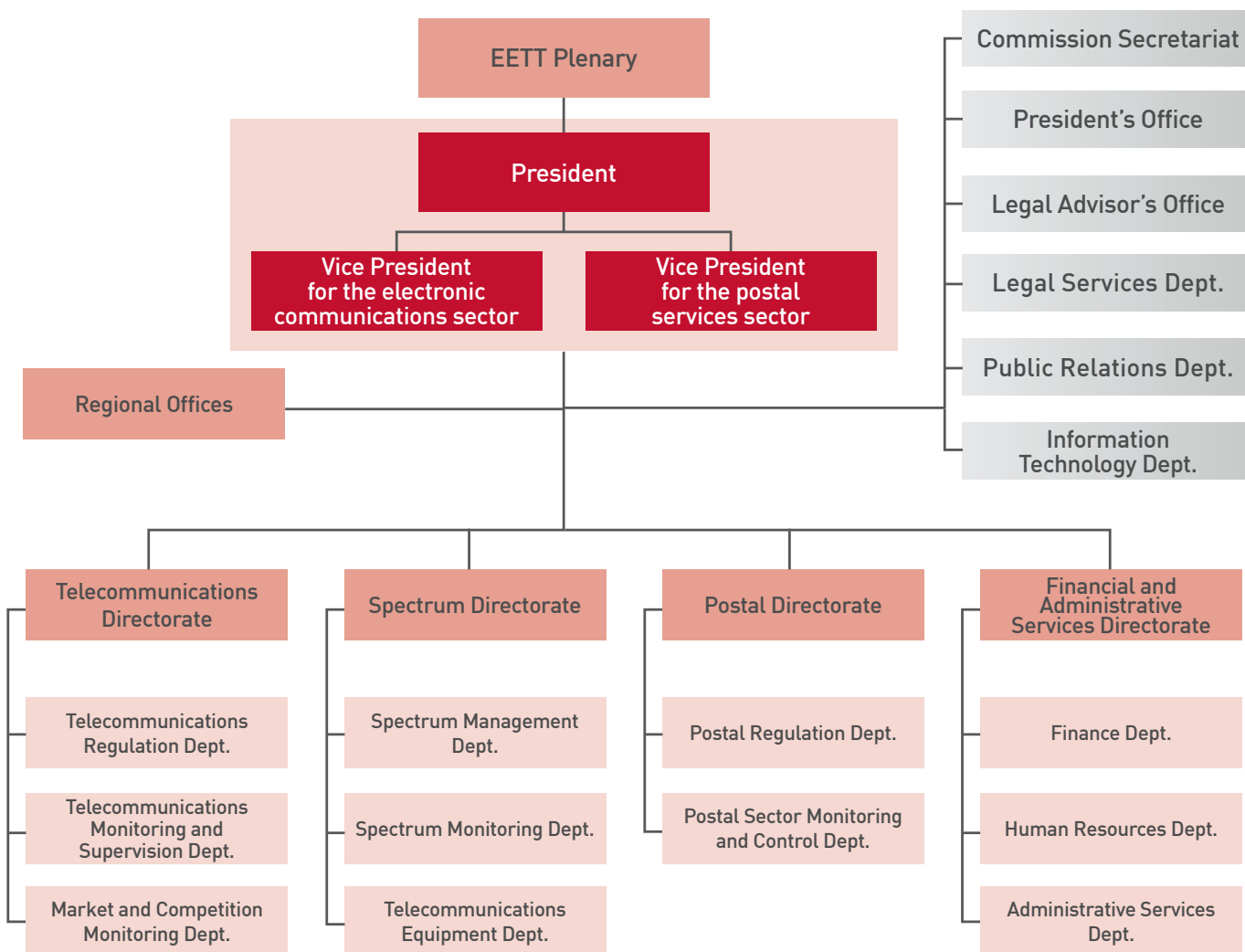
### 3.3. Organisation

EETT has a formal organisational chart set out with clear-cut defini-

tion of duties for every organisational unit. Each department has recorded its procedures in flow charts.

The organizational structure of EETT is presented in detail in Chart 3.2.

**Chart 3.2: EETT Organisational Chart**



Source: EETT



### 3.4. Electronic governance & transparency

«E-governance» is defined as the introduction and use of Information & Communications Technology (ICT) in public administration, which combined with organizational change and staff's new skills, aims at substantially improving public services and enhancing transparency. The strategic objectives of promoting e-governance at EETT:

- The development and provision of high-quality electronic services to citizens and operators.
- The development of integrated and interoperable information systems that permit the collection, management and distribution of information in a manner that facilitates operators to plan and implement their actions and informs citizens directly and reliably.

In this context, in 2014, EETT focused on developing and expanding, mainly with its own means and resources, the following e-governance applications that ensure transparency, improve productivity and support the operators of the electronic communications and postal services markets. In the following paragraphs, online applications developed or updated by EETT throughout the year are described in detail.

#### 3.4.1. Applications that enhance transparency

**“CLARITY” Program Application (DIAVGEIA):** Since 2010, EETT

posts all acts whose publication is imposed by the relevant legislation<sup>13</sup> on the “CLARITY” Program Application. In January 2014, the Authority completed an automatic system interface between its Electronic Document Management System (SHDE), which is utilised by EETT for document handling, and the “CLARITY” Program Application. By June of that year, EETT was connected to the new “CLARITY” Program Application, DIAVGEIA II, at <https://diavgeia.gov.gr/f/eett>. The Authority proceeded to develop system interfaces, in accordance with the new program requirements so as to automate the process of publishing acts originating from SHDE and the Financial Management System. Automation in publication of all sorts of DIAVGEIA II acts is expected to be fully implemented by early next year.

Throughout the year, 2,663 acts were posted, concerning mainly other individual administrative acts (1,879 decisions) as well as project assignments/procurements, expenditure approvals, establishment of collective bodies, committees, working groups, project groups, members of collective bodies, decisions involving single-member institutions, contracts, regulatory acts, notices of calls for tenders, contract awards, organizational changes, budget approvals, balance sheets etc. The majority of these (at least 77%) were posted on DIAVGEIA automatically.

#### Enhancement of the EETT website ([www.eett.gr](http://www.eett.gr)):

EETT continued to enrich its website with content and electronic services (see Section 5.3). According to the available statistics, in 2014 the website received 456,980 visits by 246,134 unique visitors. The average monthly traffic increased by 12.85% compared to 2013, while the number of unique visitors increased by 17.45%. The most visited sections were, in order, the english page with press releases and announcements, the section for consumers and especially the electronic communications issues, the search engine, the complaint submission form, the search for registrars of domain names [.gr] and the online services. Particularly popular were also the frequently asked questions (FAQs) on numbers portability, the telecommunications sections addressed to operators, the FAQs on antenna constructions, the plenary agendas and the FAQs about Multimedia Information Services. Among the documents provided, the measurement results of H01 quality indicator on the availability and cost of end user help desk services were the most downloaded.

#### 3.4.2. Applications for operators

##### Expansion of the Electronic Submission of Applications System (SILYA):

This is a one-stop shop web based application for submit-

13. L.3861/2010 “Strengthening transparency by the obligatory posting of laws and acts of the governmental, administrative and self-administrative bodies on the Internet on “Clarity Program” (Diavgeia) and other provisions” (GG 112/A/13-07-2010) as amended by L.4210/2013 “Regulations of the Ministry of Administrative Reform and e-Governance and other provisions”(GG 254/A/21-11-2013), which institutionally reinforces the upload of administrative acts on the Internet.

**Figure 3.1: Applications for operators at www.eett.gr (available only in Greek)**



ting and managing applications for the construction of antennas and the relevant approvals and licenses. Section 7.2.1 discusses in detail how this application was expanded in 2014.

**Software for conducting the tendering process in the bands 800MHz and 2.6GHz:** This is the software that successfully supported the online auction for the granting of radiospectrum rights of use in the 800MHz and 2.6GHz bands.

**Granting General Authorisation certificates:** By using a software application, the operators can now submit online applications and accompanying documents relating to electronic communications ser-

vices. Chart 3.3 demonstrates the evolution of the number of online applications compared with the number of paper applications since this software application launch in 2010. The aim is better service and faster processing of operators' requests. In this context, EETT continues to improve and enrich its software application and, as a consequence, the electronic communications service providers can now obtain General Authorisation certificates electronically.

**Granting domain names certificates:** The domain name holders are currently able to directly acquire a registration certificate by contacting the email address of their registrar. The applica-

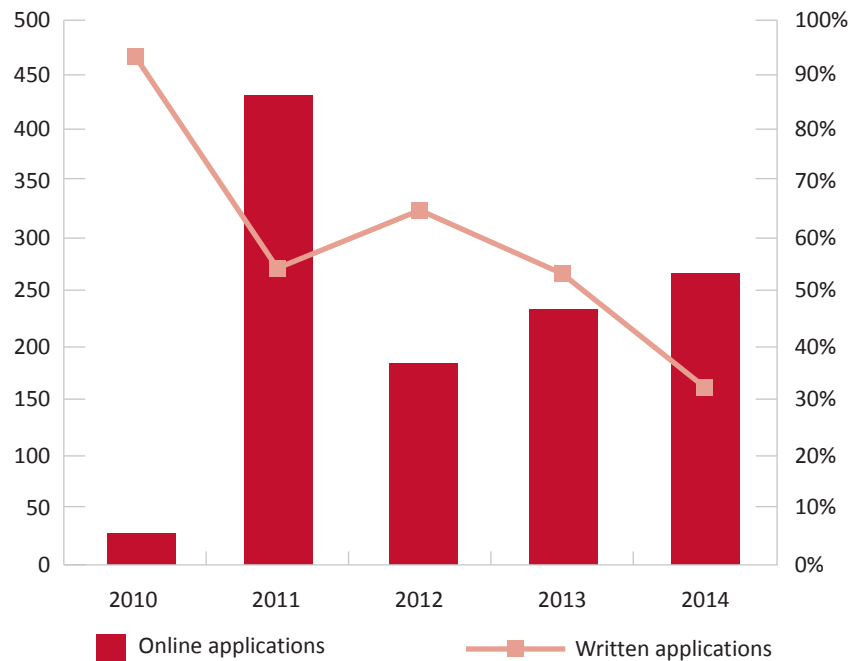
tion software that issues the certificates is available to all domain name registrars.

**Online submission of annual fees for postal services:** EETT expanded its web application for postal services operators by adding the functionality of submitting online the annual fee statements (see Section 8.3.2).

**Electronic management system for consumers' complaints "HERMES":** «HERMES» is a web application for electronic communications operators. It improves and accelerates customer service to the consumers who address their complaints to EETT. This system submits the complaint directly



**Chart 3.3: Online vs written applications submitted to EETT**



Source: EETT

to the service provider and keeps the historical record while the consumer is informed electronically of the complaint receipt. «HERMES» was launched in January 2015.

### 3.4.3. Applications for internal use at EETT

**Enriching the Intranet:** In 2014, EETT continued to use its intranet that was launched last year and since then has evolved as the main information, communication and knowledge dissemination platform within EETT. In May, a new functionality was added that enables personnel to submit their requests online and accompanying

documents to the Financial and Administrative Services Directorate. In the same month, for the convenience of users searching for information, the homepage was enriched with a list of the most recent posts («What's new»), which is automatically updated. In June, an easy-to-use tool for posting and searching classified advertisements was added.

**A «knowledge management» tool:** In November, recognizing the significance of «knowledge»<sup>14</sup> as an intangible asset, EETT integrated its intranet with a «Knowledge Management»<sup>15</sup> tool that (see Figure 3.2):

1. enables collection and organization of knowledge that is scattered in organizational units. Every employee has the opportunity to post content, hierarchically organize in folders and subfolders as well as update while keeping the previous versions.

2. provides personnel with direct access to posted knowledge. It provides hierarchical navigation (i.e., from folder to subfolder etc) and a powerful keyword search tool. The search is not limited to the contents of the intranet but extends to other websites (e.g., EU, BEREC, etc.) as well as the file server of EETT, providing au-

14. «Knowledge» is the information that is available at the right place, time, context and manner to those who require it in order to make informed decisions.

15. «Knowledge Management» is the strategy that assists an organization to identify, collect, store, organize and communicate information in a manner that increases efficiency and effectiveness of problem solving, personal development, strategic planning and decision making.

thorised access to personnel with appropriate rights. The user may filter metadata<sup>16</sup> and restrict the search to specific websites. The tool, also, provides advanced “boolean search”, which allows users to combine keywords with boolean operators (such as «and» and «or») to achieve the most relevant results (see Figure 3.3).

Knowledge dissemination is expected to contribute significantly to improving internal procedures, services provided as well as EETT decision making process.

**Business intelligence environment using Business Intelligence tools:** In November 2014, EETT launched business intelligence infrastructure so that the Authority’s administration would monitor statistical data involved in the decision process.

In the scope of this project, EETT’s senior management has designed a number of information units that briefly present critical information about the progress of business cases. Meanwhile, key performance indicators (KPI) were set in agreement with EETT’s management plan and vision. The data upload from EETT’s Integrated Information System (IIS) and the consequent data storage in a separate “data warehouse” was designed. These data were stored in a multi-dimensional cube format that permits rapid retrieval of summary information as well as drill-down searching capabilities down to the

level of individual case. At the same time, personalised information boards for each executive, in the form of «dashboards», were designed and implemented in order to provide information that:

- is relevant to each executive’s role,
- is accurate,
- presents historical trends of EETT’s key performance indicators,
- is easily displayed in the form of charts,
- is available in real time.

The project outcome is that EETT’s senior management now holds the appropriate tools to promptly identify areas of possible delays in the business projects and directly proceed to corrective action.

16. «Metadata»: the term consists of the greek word “meta” and the latin word “data”. Metadata are data that describe other data. Typical examples of a file metadata are its file type, author, date of its latest modification etc.



Figure 3.2: Page from the «Knowledge Management» tool (available only in greek)

Figure 3.3: Advanced search with the «Knowledge Management» tool





# 4

## 4.1. Licensing of digital terrestrial television networks

### The tender process and the benefits

In 2013, the Ministry of Infrastructure, Transport and Networks along with EETT, as required by L.4070/2012, started the design and implementation of the tender process for granting the radiofrequencies rights of use for digital terrestrial television broadcasting networks, paving the way for the definitive switchover to digital terrestrial television and implementing one of Greece's national obligations<sup>17</sup>. During the design of the process, EETT, in constant communication

with DG Competition and DG Connect of the European Commission, made its proposals and set them to a consultation process, taking into account the European context and aiming at optimum spectrum use and granting of the freed spectrum, through a new tender process (digital dividend) to mobile telephony providers for the development of advanced mobile broadband networks and services (4G/LTE).

Specifically, the tender process for licensing of digital terrestrial television network providers, which was carried by EETT:

- Ensured without restrictions the right of all interested parties to

bid via an open, internationally recognized tender process, as set out in the European framework and after a public consultation of the tender document. The process specified that granting of 14 rights to use radiofrequencies (one national and 13 regional) will be based on financial offers, irrespective of the number of participants in the auction.

- The starting price was set by a special working group of the Ministry of Infrastructure, Transport and Networks (Decision 36075/1138/19-07-2013 of the Deputy Minister of Infrastructure, Transport and Networks) in which experts of the Minis-

17. L.4070/2012 "Regulations of electronic communications, transport, public works and other provisions» (GG 82/A/10-04-2012), article 21, par. 16.



# SPECTRUM LICENSING TENDERS

In 2014, EETT completed three major spectrum tenders. The first one concerned licensing of digital terrestrial television networks, the second one licensing in the 800MHz (digital dividend) and 2.6GHz radiofrequencies bands and the third one licensing in the 3.4–3.8GHz band. These spectrum tender processes are examples of effective utilization of a scarce national resource, through transparent procedures, on the basis of strict time schedules and in continuous dialogue with the market, the EU and the Greek State.

try of Infrastructure, Transport and Networks, the Ministry of Finance and EETT also participated, in accordance with the principles of legality and on the basis of the internationally recognized methodology applied in the European Union (EU).

- Ensured the right to access digital TV information and entertainment, by imposing to the network provider the obligation to transmit all licenced content to develop the network throughout the Greek territory with a >95% population coverage and a provision for an even larger population coverage through the installation of gap fillers, the obligation for cost orientation, the obligation of non-discrimination and the obligation

of price control on charges for all broadcasting TV stations (national and regional). It also ensured the compulsory transmission of the regional television stations, since there was no investment interest for any region of the Greek territory.

These actions ended the transitional arrangements where there were no licensed digital terrestrial television providers and no price for the use of radiofrequencies was paid with negative effects on public revenue. Specifically, EETT:

- Obligated, based on the tender document, the national network provider to «acquire» at the starting price all regional licenses for which there was no investment interest (e.g., in areas of

the Aegean Sea and other border areas) (paragraph 7.7.1 of the tender document).

- Imposed to the network provider price controls on regional television stations charges, according to a techno-economical model, which was also placed in public consultation, but also imposed the obligation of non-discrimination between TV channels (quality of service, time service, pricing, new services).

## Results of the tender process

EETT's tender process for digital television network deployment was completed on 07-02-2014. The company under the name «Digital Broadcasting Telecommunications Services Provider Société Anon-



yme» and under the title «DIGEA-Digital Provider SA» submitted the only bid and, after the review of the preselection criteria, was awarded the rights for the national network and also for the regional networks, in accordance with the terms of the tender, for the total consideration of 18.6 million euros.

### Roll-out of digital terrestrial television network

In 2014 and after signing the contract for the granting of rights to use radiofrequencies for digital terrestrial broadcasting, network deployment was started, in accordance with the ministerial decision of the Frequency Map (JMD 42800/05-10-2012), which includes 156 broadcasting sites with a 96.2% population coverage and sites for additional coverage, if required.

These rights had to be amended by EETT twice, on 30-04-2014 and on 04-09-2014. The first amendment<sup>18</sup> (which followed the amendment of the relevant ministerial decision<sup>19</sup>) was required after ascertaining that channel 54, which is available for deployment of digital terrestrial broadcasting networks in allotment 1 of zone 1 (in Evros), was occupied

by emissions from Turkey. With the amendment, it was replaced by channel 56 which is also registered for Greece.

The second amendment<sup>20</sup> was performed after a public consultation and concerned the modification of the function from which the maximum price per Mbps that the holder of rights of use radiofrequencies can charge to each regional content provider is derived. The amendment was required since the rights to use radiofrequencies for regional coverage were granted to a single provider, despite the initial predictions that more would occur. As a result, Greek territory was treated as one peripheral zone.

Also, EETT, after consulting the Ministry of Infrastructure, Transport and Networks, assigned identifiers for Program Specific Information (PSI) to the network providers of digital terrestrial broadcasting (DIGEA and NERIT). The assignment was considered necessary for the proper operation of digital broadcasting networks as well as the avoidance of coordination problems with digital broadcasting signals from neighbouring countries.

The network service provider (DIGEA) is obliged to submit to EETT reports on the deployment of its network, from the date its rights enter into force until the date where its network is fully deployed. The reports should be submitted at the latest within 10 working days after the analog broadcast switch off date.

Network provider reports indicate:

- the installed stations, the stations installed for additional coverage and their technical characteristics,
- maps of the actual radio coverage in electronic form for each allotment area as well as for the network in total,
- reference of towns, villages and settlements with a population of over 500 inhabitants located within the coverage area at the given time,
- the average data flow per type of content/service (video and sound, data, web services, additional services) per month.

The gradual activation of the 155 out of 156 broadcasting sites, with the parallel phasing out of the analog broadcasts, was completed on 21-02-2015, with a deviation from the predefined date (29-12-2014). For the delay of the digital switchover

18. EETT decision no. 716/3/30-04-2014 "Amendment and codification of EETT decision no. 707/2/13-02-2014 «Granting to the company under the name «Digital Broadcasting Telecommunications Services Provider Société Anonyme» and under the title «DIGEA-Digital Provider SA» of rights to use digital terrestrial broadcasting radiofrequencies for the installation, operation and exploitation of digital terrestrial broadcasting network and the provision of publicly available electronic communications services»".

19. Decision of the Minister of Infrastructure, Transport and Networks no. 68148/2461/20-12-2013 "Amendment no. 45858/1799/Φ150 of the decision of the Deputy Minister for Infrastructure, Transport and Networks on the "Restriction of the number of radiofrequency rights of use to be provided for digital terrestrial broadcasting of national and regional coverage and definition of the type of tender process according to article 23 of par. 3 of L.4070/2012" (GG 3275/B/23-12-2013) as amended with the ministerial decision no. 50270/1466/29-08-2014 (GG 2364/B/03-09-2014).

20. EETT decision no. 731/2/04-09-2014 "Amendment of EETT decision no. 716/3/30-04-2014 "Amendment and codification of EETT decision no. 707/2/13-02-2014 «Granting to the company under the name «Digital Broadcasting Telecommunications Services Provider Société Anonyme» and under the title «DIGEA - Digital Provider SA» of rights to use digital terrestrial broadcasting radiofrequencies for the installation, operation and exploitation of digital terrestrial broadcasting network and the provision of publicly available electronic communications services»".

completion, the network provider was called by EETT to a hearing. It should be noted that the last broadcasting site has not been activated yet, since there have been reactions by the area residents and the municipal authority did not permit its installation.

### **EETT measurements and roll-out inspections for digital terrestrial television switchover**

Since the summer of 2014, where the first switchover to digital television took place, EETT, in the context of its supervisory jurisdictions for smooth switchover to digital terrestrial television and in accordance with the terms of the tender process, carried out with portable equipment, detailed and intensive measurements and recordings for the population coverage and the ability to receive digital signal in each area where the switchover was completed.

According to the results of the measurements, the population coverage is overall in accordance with the projections of the frequency map (JMD 42800/05-10-2012), while in some cases the digital signal was received in areas not included in the map. In the cases of incomplete coverage, compared to that required by the frequency map, EETT took the appropriate actions.

It should be noted that according to the rights to use radiofrequencies allocated to the network provider after the tender process, the pro-

vider is obliged to provide nationwide population coverage at least 95%, a percentage which is among the highest in Europe for digital terrestrial television, while based on the network design, population coverage of 96.2% can be achieved.

EETT proceeded to record successfully the ability to receive digital terrestrial television in areas of Central Greece, Peloponnese, Thrace, Eastern Macedonia, North Aegean and parts of Western Greece, the switchover of which was completed in 2014.

In order to successfully complete the digital switchover in the country, the Authority will continue to supervise and monitor the compliance of the provider with the population coverage obligations, intervening in case of deviation from the provisions of the frequency map. EETT also updates the national frequency register with the enabled digital broadcasts.

*Additional information on EETT inspections regarding digital television broadcasting are presented in Section 7.1.7.*

### **4.2. Licensing of the 800MHz (digital dividend) and 2.6GHz frequency bands**

On 13-10-2014, EETT completed, with success, the tender for the granting of rights to use radiofrequencies in the spectrum regions of 800MHz (digital dividend) and 2.6GHz. This is the biggest so far -in terms of available spectrum- grant-

ing of rights so as to develop mobile communication networks in Greece.

With this tender process, EETT completed the project of making the digital dividend available, which had started in May 2013. In order to efficiently use spectrum, which is a scarce national resource, EETT has set the basis for the switchover to digital terrestrial TV broadcasting and the granting of the spectrum freed from analog TV to electronic communications providers for the commercial development of mobile communications services, without technological limitations (Long Term Evolution-LTE networks or any other).

All the available spectrum in both frequency bands was awarded to the companies COSMOTE, VODAFONE-PANAFON and WIND.

### **Development of the tender process**

In May 2014, after several months of preparation both at technical and at managerial level, but also in cooperation with stakeholders (Civil Aviation Authority, Armed Forces) and upon approval of the Minister of Infrastructure, Transport and Networks, EETT carried out a public consultation on the necessity of setting the number of rights to use radiofrequencies in the 800MHz and 2.6GHz bands and the granting process, together with the relevant draft tender document.

On 01-08-2014, given the ministerial decision<sup>21</sup> to set the number of

21. Decision of the Minister of Infrastructure, Transport and Networks no. 46281/1334/31-07-2014 "Restriction and process of granting of radiofrequency rights of use in the 800MHz and 2600MHz bands for the provision of publicly available electronic communications services" (GG 2109/B/01-08-2014).



rights to use radiofrequencies in these bands, EETT published the tender document<sup>22</sup>, which finalized the tender process, taking into account the views of the interested providers.

The tender process was consistent with the current European regulatory framework and in particular with the revised Framework and Licensing of networks and services Directives (2002/21/EC and 2002/20/EC respectively) and was designed aiming to:

- the competitive development of the Greek electronic communications market, in accordance with the principles of transparency, non-discrimination and proportionality,
- maximization of social benefits in terms of sufficient options and competitiveness in price and quality,
- equitable, balanced and non-discriminatory treatment of existing providers and any new entrants regarding the access to freed spectrum,
- finding the best solution for the evaluation and efficient use of spectrum, which is a scarce national resource, taking into account coexistence issues with spectrum uses in adjacent frequency bands (digital television for 800MHz, aeronautical radio navigation systems for 2.6GHz).

### The tender process

The tender process was held on 13-10-2014, in accordance with the timetable established after taking into account the international and European commitments of the country, defining that the digital dividend should be awarded to the mobile operators until 01-11-2014. The tender process aimed to award 24 radio spectrum blocks:

- six (6) blocks with bandwidth 2x5MHz in the 800MHz frequency band and a starting price of 51.5 million euros/block,
- fourteen (14) blocks with bandwidth 2x5MHz in the 2.6GHz frequency band and a starting price of 4.7 million euros/block,
- four (4) blocks with bandwidth 10MHz in the 2.6GHz frequency band and a starting price of 1.3 million euros/block.

The procedure consisted of two stages. In the first stage, the three companies involved in the process were awarded of one (1) spectrum block with bandwidth 2x5MHz in the 800MHz band at the starting price. The price paid at this stage of the process from the three companies was 154.5 million euros. In the second stage, a 10-round auction was conducted for the remaining available spectrum in the 800MHz band and the entire available spectrum in the 2.6GHz band.

It is noted that according to the design of the auction, there were limitations in the number of awarded spectrum blocks in each band. Especially in the 2.6GHz frequency band, there was a maximum allowed bandwidth of 70MHz. With this limitation, the tender process was completed at the end of the fourth round and spectrum of 20MHz bandwidth in the 2,6GHz band was not awarded. EETT investigated if the participants were interested in the non-awarded spectrum, the restriction was lifted and the auction was completed after six additional rounds with granting of all available spectrum blocks.

Overall, the three participating companies were awarded the following spectrum blocks with duration of use from 01-11-2014 to 28-02-2030:

- COSMOTE: Two (2) blocks in the 800MHz band, with bandwidth 2x5MHz, and eight (8) blocks in the 2.6GHz band, six (6) with bandwidth 2x5MHz and two (2) with bandwidth 10MHz, with total consideration of 134.788 million euros.
- VODAFONE-PANAFON: Two (2) blocks in the 800MHz band, with bandwidth 2x5MHz, and six (6) blocks in the 2.6GHz band, four (4) with bandwidth 2x5MHz and two (2) with bandwidth 10MHz, with total consideration of 124.501 million euros.

22. EETT decision no. 729/2/01-08-2014 "Approval of tender document for granting the radiofrequencies rights of use in the bands of 800MHz and 2600MHz».

- WIND: Two (2) blocks in the 800MHz band, with bandwidth 2x5MHz, and four (4) blocks in the 2.6GHz band, with bandwidth 2x5MHz, with total consideration of 121,825 million euros.

#### Benefits of the tender process

- In financial terms, 381.11 million euros were collected.
- At market level, granting rights to use radiofrequencies in the 800MHz and 2.6GHz bands is a critical step for the development of new wireless technologies for fourth generation mobile networks (4G), which support innovative services for communication, access, content and broadband data transmission.
- From the consumers' perspective, the benefits are particularly important, since with the development of fourth generation mobile networks (4G), customers will be able to enjoy services, making the most of the features offered by technology today.
- For the country, the development of advanced communications is expected to create new infrastructures in both urban and rural areas and the islands, contributing to the elimination of the «digital divide».

### 4.3. Licensing in the 3.4–3.8GHz bands

On 17-03-2014, EETT completed the tender process for the granting of rights to use radiofrequencies in the bands of 3.4-3.8GHz. Only one company (OTE SA) participated in the process and as a result there was no auction. The spectrum block of 3.440-3.470GHz paired with 3.540-3.570GHz was awarded to OTE SA for a consideration of 2.542 million euros. The relevant license will enter into force on 16-08-2016. Spectrum blocks of the 3.4-3.8GHz frequency band may be awarded in the future with a new tender process, which, as stated in the tender document, can be carried out after March 2016.

After the two public consultations held in 2013 for investigating market needs in the 3.4-3.8GHz frequency bands and the relevant ministerial decision<sup>23</sup>, EETT published the tender document<sup>24</sup> on 18-02-2014.

EETT succeeded in completing the tender process on time, having provided the stakeholders with all relevant information and with the possibility to participate in public consultations. The tender process was designed to be carried out, if required by the number of participants, from EETT, with its

own staff and resources. Also, in November 2014, EETT, with a relevant decision, established a procedure for the extension of rights to use radiofrequencies that are in force in the 3.4-3.6GHz bands and that expire before 16-08-2016<sup>25</sup>.

It is noted that the bands of 3.4-3.8GHz are considered important for future growth and the delivery of broadband wireless communication services in Europe, whilst their utilization has been included in the EU Radio Spectrum Policy Program (RSPP).

23. Decision of the Minister of Infrastructure, Transport and Networks no. 7349/218/12-02-2014 "Restriction of the number of rights to be provided for the use of radiofrequencies in the 3.4-3.8GHz band and definition of the type of tender process according to article 23 of L.4070/2012 and amendment of the ministerial decision no. 29913/1196/2006 on the restriction of fixed wireless access rights of use" (GG 350/B/14-02-2014).

24. EETT decision no. 707/01/13-02-2014 "Approval of tender document for granting the radiofrequencies rights of use in the 3.4-3.8GHz band".

25. EETT decision no. 739/1/06-11-2014 "Procedure for extension of radiofrequency rights of use in the 3.4-3.6GHz band for the provision of electronic communications networks or/and services".



**Table 4.1. Results of the tender process in the 800MHz and 2.6GHz bands (in million EUR)**

<b>800MHz Band</b>		
<b>Radio Spectrum</b>	<b>Successful Tenderer</b>	<b>Price</b>
Two (2) spectrum blocks with bandwidth 2x5MHz	COSMOTE	103.00
Two (2) spectrum blocks with bandwidth 2x5MHz	VODAFONE-PANAFON	103.10
Two (2) spectrum blocks with bandwidth 2x5MHz	WIND	103.01
<b>TOTAL</b>		<b>309.11</b>
<b>2.6GHz Band</b>		
<b>Radio Spectrum</b>	<b>Successful Tenderer</b>	<b>Price</b>
Six (6) spectrum blocks with bandwidth 2x5MHz and two (2) with bandwidth 10MHz	COSMOTE	31.79
Four (4) spectrum blocks with bandwidth 2x5MHz and two (2) with bandwidth 10MHz	VODAFONE-PANAFON	21.40
Four (4) spectrum blocks with bandwidth 2x5MHz	WIND	18.81
<b>TOTAL</b>		<b>72.00</b>
<b>GRAND TOTAL</b>		<b>381.11</b>

Source: EETT





# 5

## 5.1. Consumer Service Sector (CSS)

Capitalising on the valuable experience gained from its long-time operation, EETT's CSS constitutes a reference point for consumers in the field of electronic communications and postal services, also triggering a series of EETT supervisory and regulatory interventions to the benefit of the market and consumers.

During 2014, CSS recorded and handled 10,883 written complaints (compared to 12,015 the previous year, i.e., an increase of 9.42%), of which 85.87% concerned mobile and fixed telephony services or the Internet, 12.59% concerned radiofrequency spectrum issues and 1.54% concerned postal services (Table 5.1).

An overall picture for the electronic communications market is presented in Chart 5.2. According to the Chart, in 2014 recorded requests and complaints followed a slight decrease of 10% with the average monthly number falling from 1,001 in 2013 to 906.

In 2014, 40.70% of complaints concerning electronic communications services were related to local loop issues (e.g., faults, connection cancellations, disputed charges, deficient customer service, arbitrary connection activations, charges for Multimedia Information Services (MIS), rejection of portability requests etc.), while roughly 29.87% concerned fixed telephony issues (e.g., faults, disputed bills, activation delays, cancellations). The total number of complaints on fixed

and mobile telephony are depicted in Charts 5.3 and 5.4, while Chart 5.5 provides a detailed presentation of local loop issues.

As regards the radiofrequency spectrum, 1,370 written complaints were received by CSS concerning radio and telecommunications issues and the construction of mobile telephony antennas. A detailed breakdown of complaints is presented in Chart 5.6.

As regards postal services, EETT received 168 written requests/complaints, 57.14% of which were related to problems in the provision of Universal Service (such as distribution problems, delays in the delivery of postal items, poor customer service, loss or damage of items). Complaints regarding courier services mainly concerned poor

# **CONSUMERS**

Among EETT's top priorities is to inform consumers and protect their interests. To this end, in 2014 the Authority handled 10,883 written requests and complaints through the Consumer Service Sector (CSS), undertook major initiatives and developed new web applications and services to the citizen.

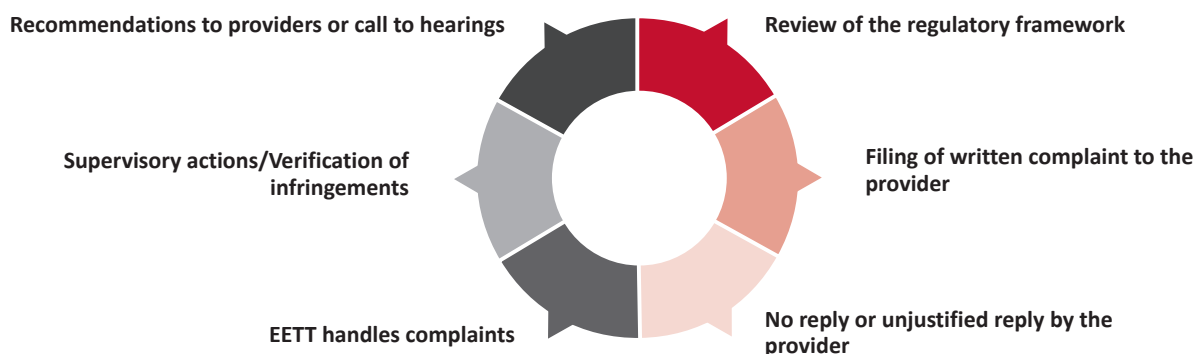
customer service as well as delayed delivery. A detailed breakdown of all written complaints regarding postal services is presented in Chart 5.7.

Although written complaints were decreased as compared to 2013, this decrease had practically no

effect on the time needed for response -as reflected in the relevant indicators (Chart 5.8)- as the consumer receives the reply to his/her complaint by the provider in about 20 working days from the date of submittance to EETT.

To further improve complaint handling, EETT developed an electronic system, "HERMES", through which consumers' requests/complaints are delivered to the provider immediately. More information on "HERMES" is presented in Section 3.4.2.

**Chart 5.1: CSS operation**



*For efficiency reasons, consumers should first and foremost contact their provider, asking in written to resolve any issues and then address to the competent authorities and services, such as EETT.*

Source: EETT



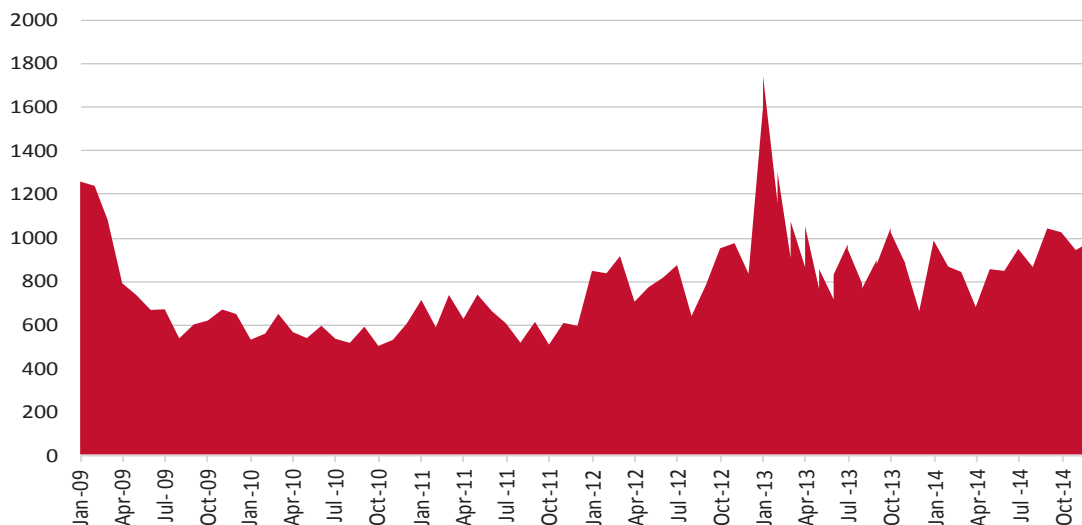
**Table 5.1: Classification of written requests/complaints (%)**

	2007	2008	2009	2010	2011	2012	2013	2014
<b>Telecommunications</b>	<b>90</b>	<b>89</b>	<b>78</b>	<b>75.1</b>	<b>75</b>	<b>76.7</b>	<b>84.6</b>	<b>85.9</b>
Internet	10	10	3	4.5	2.1	1.4	30.0	40.7
Mobile telephony	3	4	12	17	17.2	19.7	29.3	23.0
Fixed telephony	77	75	63	48	50.5	48.2	21.3	29.9
Multimedia Information Services (MIS)	0	0	0	5.6	5.2	7.2	4.0	4.2
General information	3	4	7	5.2	2.6	6.3	3.3	2.2
<b>Radiofrequency spectrum (antennas)</b>	<b>6</b>	<b>6</b>	<b>13</b>	<b>17.5</b>	<b>20</b>	<b>15.3</b>	<b>10.5</b>	<b>12.6</b>
<b>Postal Services</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>2.1</b>	<b>2.4</b>	<b>1.7</b>	<b>1.6</b>	<b>1.5</b>

The sharp increase in written requests/complaints in electronic communications services for 2013 and 2014, compared to previous years, is due to the fact that complaints related to double play and triple play are now recorded as Internet complaints.

Source: EETT

**Chart 5.2: Written complaints concerning electronic communications and postal services (2009-2014)**



Source: EETT

## Quality Indicators

To assess CSS's quality of service, EETT steadily monitors and applies improvement measures to better serve consumers based on the following key performance indicators:

- Indicator KPI: Reflects consumers' satisfaction rate with the

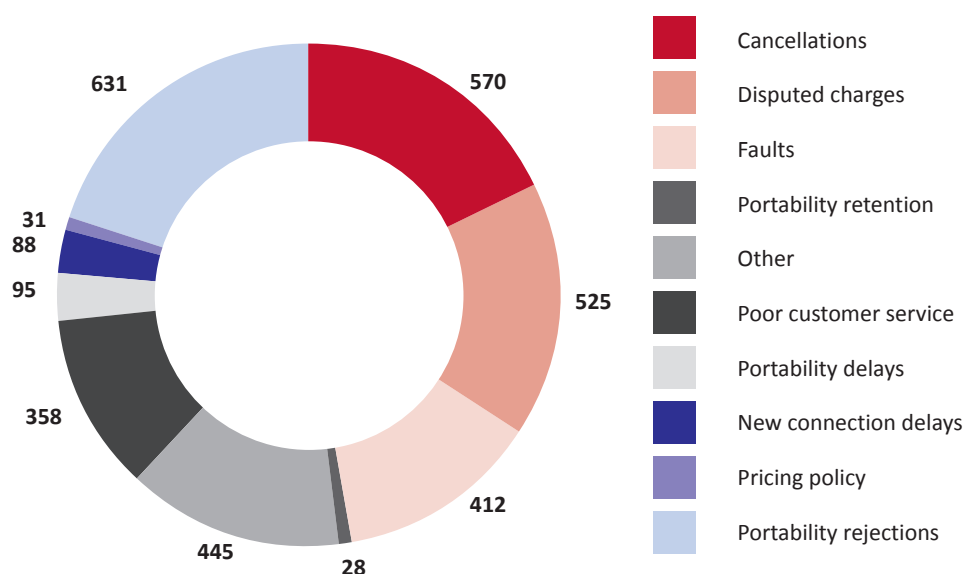
telephone service provided by CSS. In 2014, KPI1 exceeded 99.20%, compared to 99.95% the previous year.

- Indicator KPI2: Refers to the time required for processing written complaints submitted to CSS. In 2014, KPI2 stood at 15.20 working days compared to 8.39 working days the previous year

mainly due to the increase in repeated complaints.

- Indicator KPI3: Reflects the rate of complaints handled by CSS and answered in favour of consumers. In 2014, KPI3 was 18.25% compared to 30.79% the previous year mainly due to the high level of complexity of the complaints received.

**Chart 5.3: Fixed telephony complaints (2014)**



Source: EETT

### Regulatory and supervisory actions arising from CSS actions

In 2014, valuable findings derived from CSS's work regarding the implementation of the amended General License Regulation and the number portability Regulation, both of which were put into effect this year. These findings will be useful for EETT in re-evaluating the provisions of the above Regulations, a process that is scheduled for 2015. Also complaint management resulted in supervisory controls, such as ex officio inspections

by the Monitoring and Supervision Department of EETT's Telecommunications Directorate, as well as 188 inspections at points of sale (stores) of both operators and their associates to ascertain compliance with the regulatory framework. Moreover, drawing on the 10,883 written complaints, EETT issued recommendations for consumers and held a number of hearings with providers that resulted in imposing penalties. More information on the penalties imposed are given in the following sections.

### 5.2. Regulatory and supervisory interventions to the benefit of the consumer

#### Reduction of termination rates in fixed networks

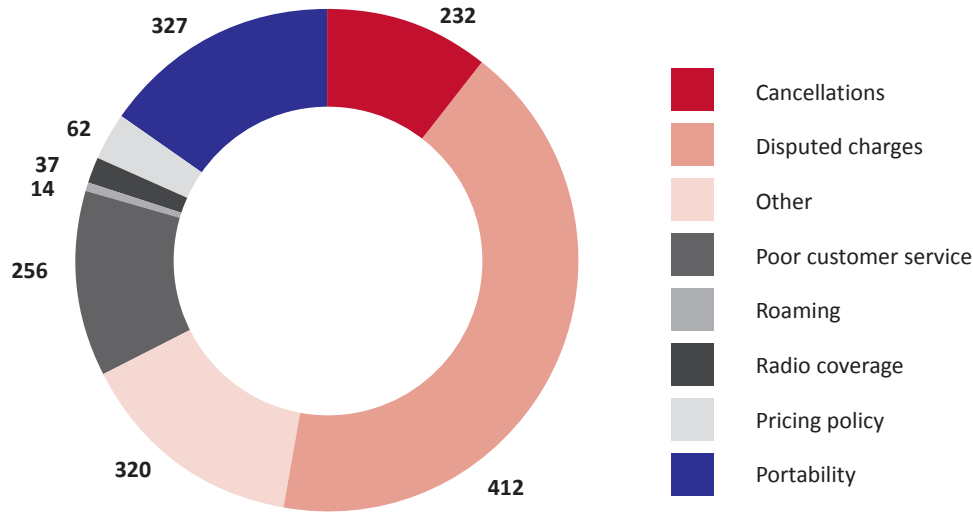
Following an EETT's decision in June 2014<sup>26</sup>, a gradual reduction in termination rates for fixed networks was imposed to all providers in the Greek market. Specifically, the charges were reduced up to 83% and amounted to 0.0735 eurocents/minute until 31-12-2014. The fee reductions will continue in the years 2015, 2016 and 2017 according to the following schedule:

	Until 31-12-2014	From 01-01-2015	From 01-01-2016	From 01-01-2017
<b>Termination charges (in eurocents/minute)</b>	0.0735	0.0695	0.0665	0.0545

26. EETT's decision 714/19/10-04-2014 (GG 1049/B/28-04-2014)

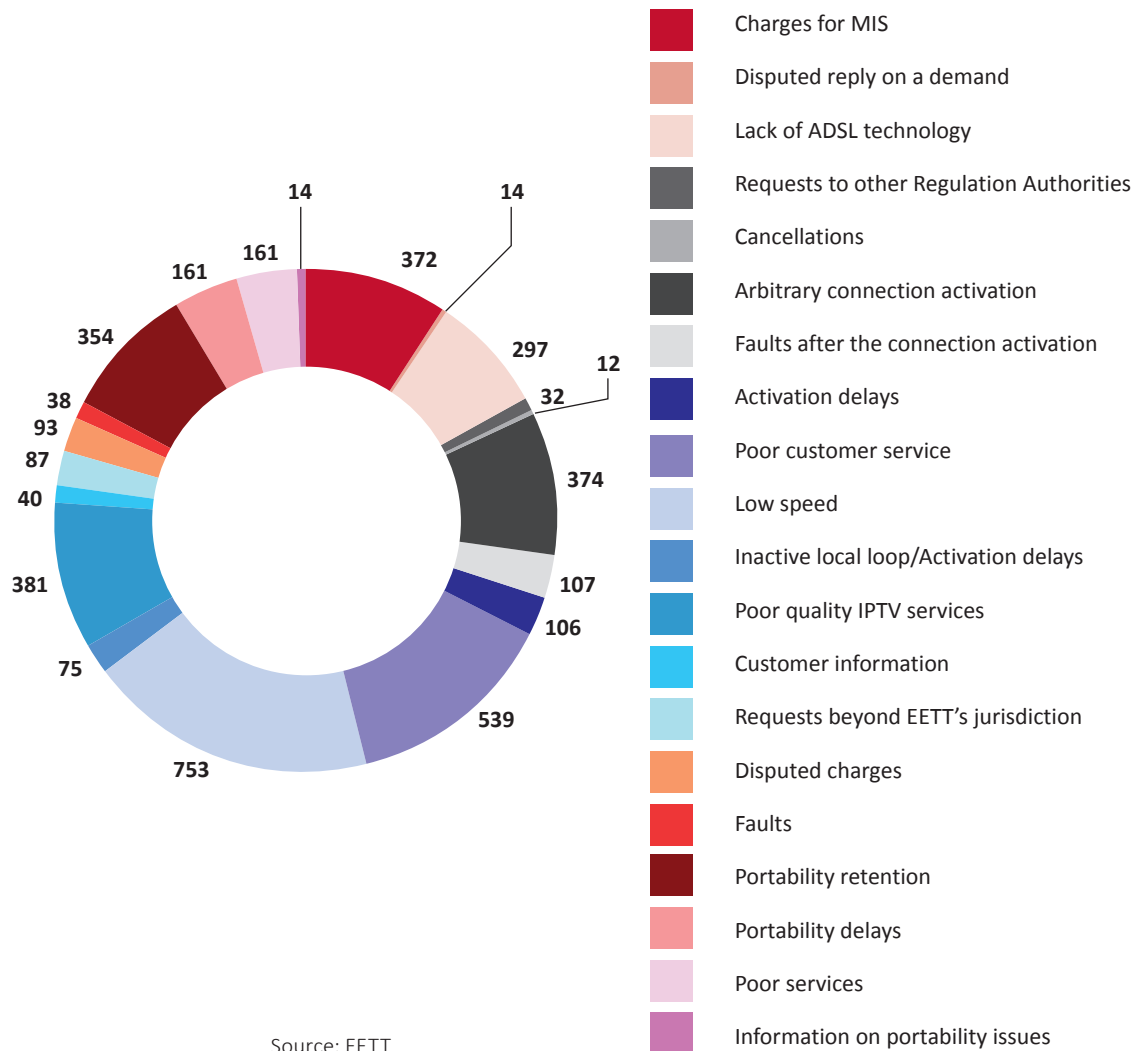


**Chart 5.4: Mobile telephony complaints (2014)**



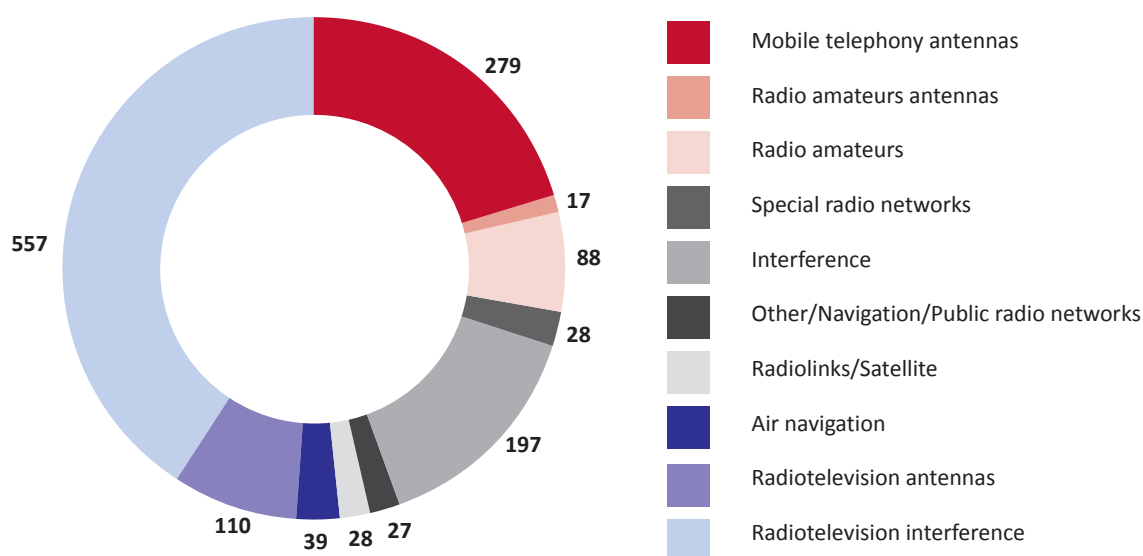
Source: EETT

**Chart 5.5: Complaints concerning local loop issues (2014)**



Source: EETT

**Chart 5.6: Radiofrequency spectrum complaints (2014)**



Source: EETT

This gradual reduction entails significant benefits for consumers as it promotes the launching of bundled services in fixed and mobile telephony with lower retail rates for calls to all networks.

It is worth noting that the regulatory interventions of EETT based on promoting competition and consumer interests have led to an overall reduction of 91% in call termination rates for fixed networks since 2006 (0.804 euro-cent/minute) by the end of 2014.

### Deactivation of stolen mobile phones using IMEI code

Following an EETT's decision<sup>27</sup> of September 2014, mobile operators are obliged to deactivate (block) mobile phones reported as stolen. Deactivation is only possible if the subscriber knows the IMEI code (International Mobile Equipment Identity) of the device. The code is

divided into sections, which include information on the manufacturer and model of the device and is essentially the «identity» of each device worldwide.

To disable stolen phones, subscribers must first declare the theft to the Greek Police (ELAS) and then submit a request to the provider, attaching the theft declaration. Each provider is obliged to keep a list of stolen phones, based on the IMEI code, provided that this code: (a) has been assigned to the device by the manufacturer and identifies uniquely and (b) it is valid in accordance with the relative international standards of GSM Association (Groupe Speciale Mobile Association).

Each provider that disables the IMEI code of a stolen phone, which belongs to a subscriber, shall inform immediately the other providers who must in turn register this spe-

cific code in their corresponding lists and proceed to the deactivation in their own networks. Receiving and/or providing any electronic communications service to a device with an IMEI that is registered on this list is prohibited to all providers. By applying this regulation, EETT seeks to strengthen consumer protection in the electronic communications market against mobile phone theft.

### EETT's recommendations to consumers

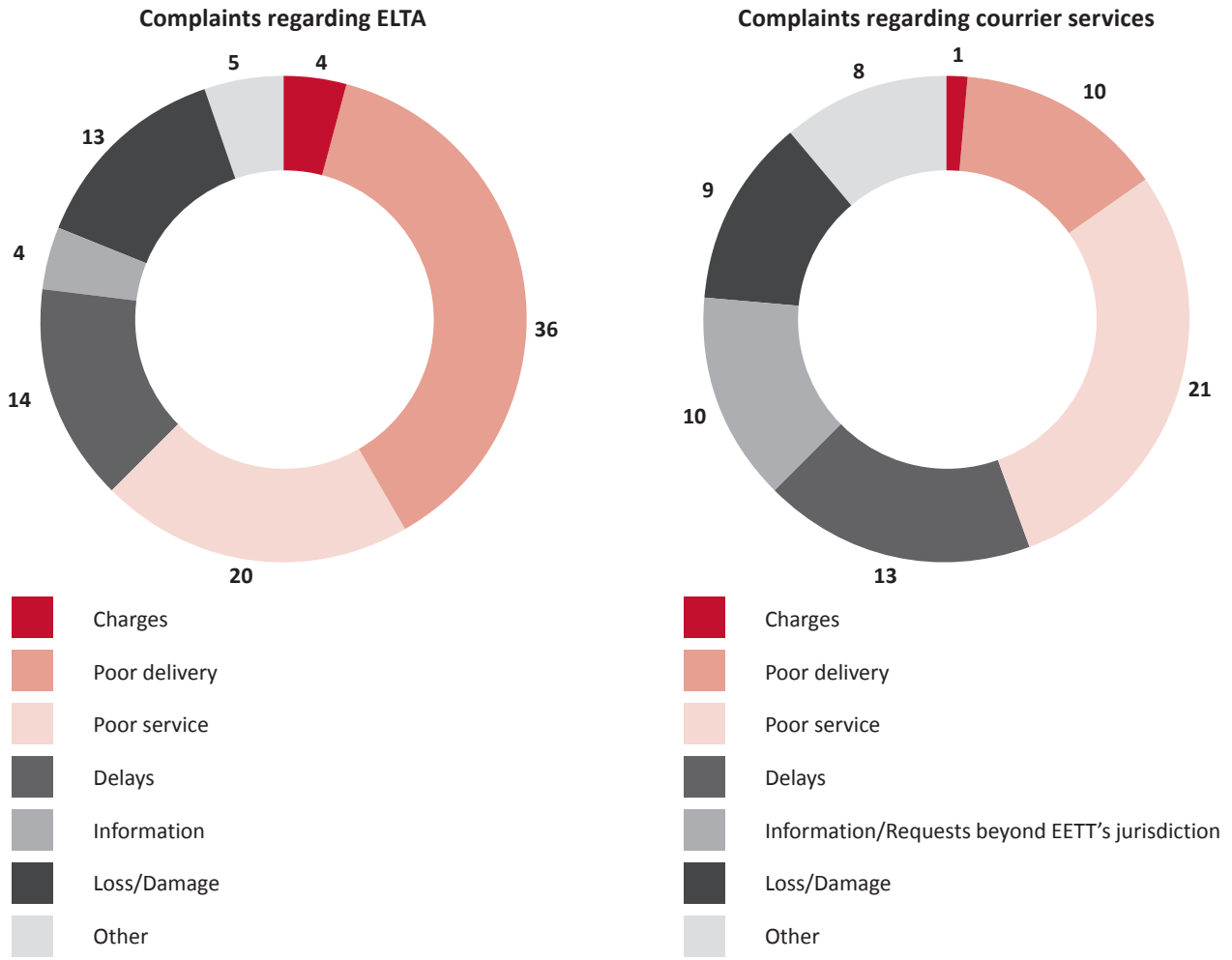
#### (a) Recommendations for electronic communications services (January 2014)

EETT issued a series of recommendations regarding services in electronic communications. In particular, the Authority listed, inter alia, the information that the consumer should seek before choosing a new telephone or Internet service (e.g., type of services, minimum contract

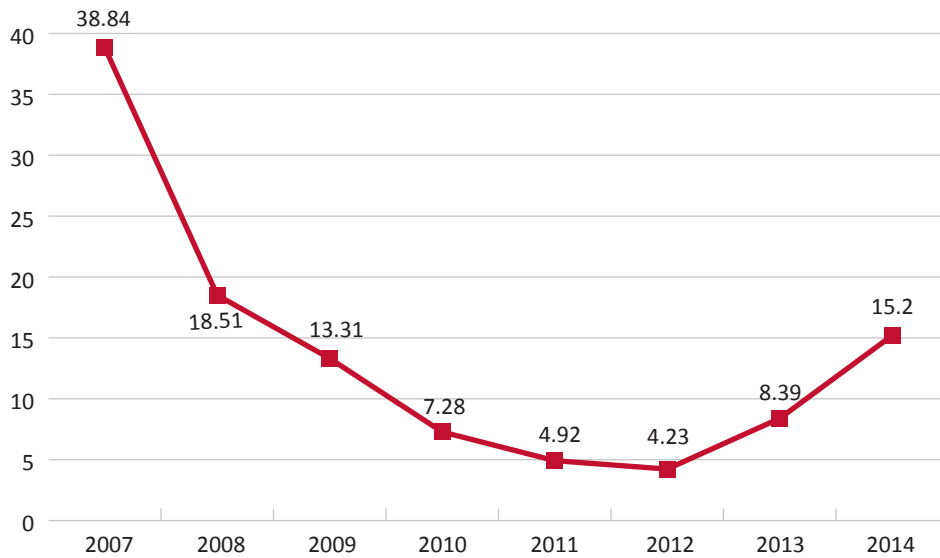
27. EETT's decision 710/014/13-03-2014 (GG 1044/B/25-04-2014).



**Chart 5.7: Complaints concerning postal services**



**Chart 5.8: Number of days to respond to written complaints (2007–2014)**





activation fee and disconnection fee, minimum cost and minimum duration of conversation per call etc.). Also EETT advised consumers to ask the provider about the estimated Internet connection speed from a fixed PC and mobile device while suggested ways to control the charges in the fixed and mobile telephony.

**(b) Instructions to consumers regarding the use of Multimedia Information Services (MIS) issues (January 2014)**

In January 2014, EETT published detailed information to consumers on matters regarding Multimedia Information Services. The Authority published online explanations about the meaning and characteristics of MIS and suggested ways

for the consumers to get informed about their charges and resolve any problems associated with the use of such services.

**(c) Consumer information on the conditions for distribution of postal items (June 2014)**

EETT, in June 2014, issued a statement regarding the new regulations that enhance the provision of US to residents in remote areas, facilitate the development of e-commerce and introduce services such as monitoring the receipt and delivery of postal items and communicating via telephone and messages (sms).

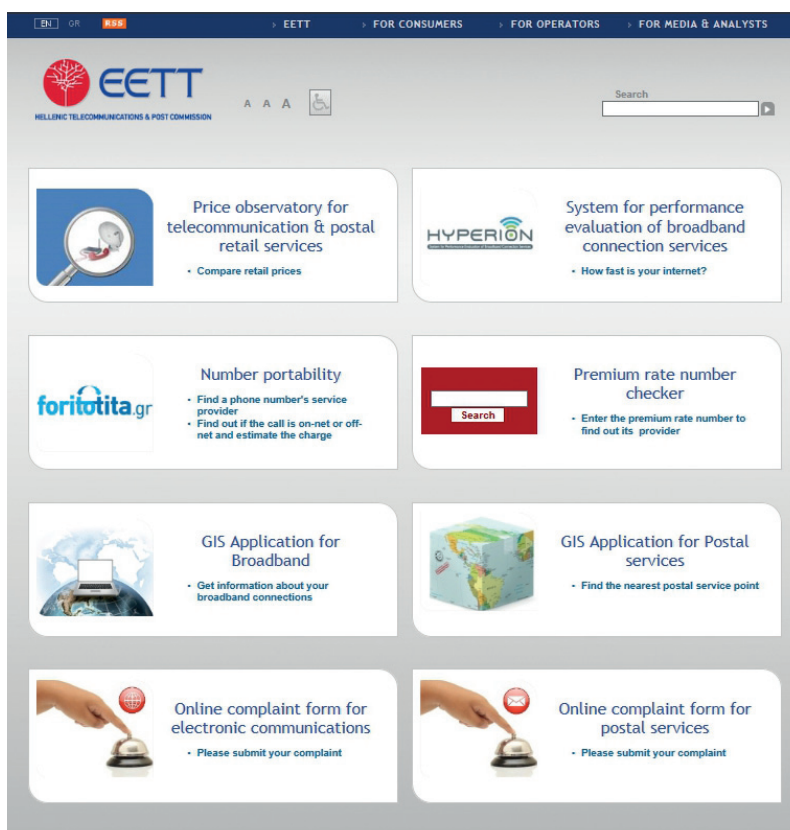
**(d) Recommendations for the summer season (July 2014)**

On the occasion of the summer, EETT published in late July 2014 recommendations for the control of the charges in mobile telephony and Internet and for safety issues (such as the precautions regarding freely accessible wireless LANs and downloading applications from untrusted sources, the need for disabling bluetooth when not in use, etc.).

**5.3. EETT’s online services**

EETT’s website (www.eett.gr) includes easy-to-use applications designed to protect consumer rights and provide access to a variety of product choices as well as more competitive and more affordable electronic communications and postal services (see Figure 5.1). In 2014, EETT continued

**Figure 5.1: Applications for consumers at www.eett.gr**





developing, upgrading and supporting its online applications as shown below.

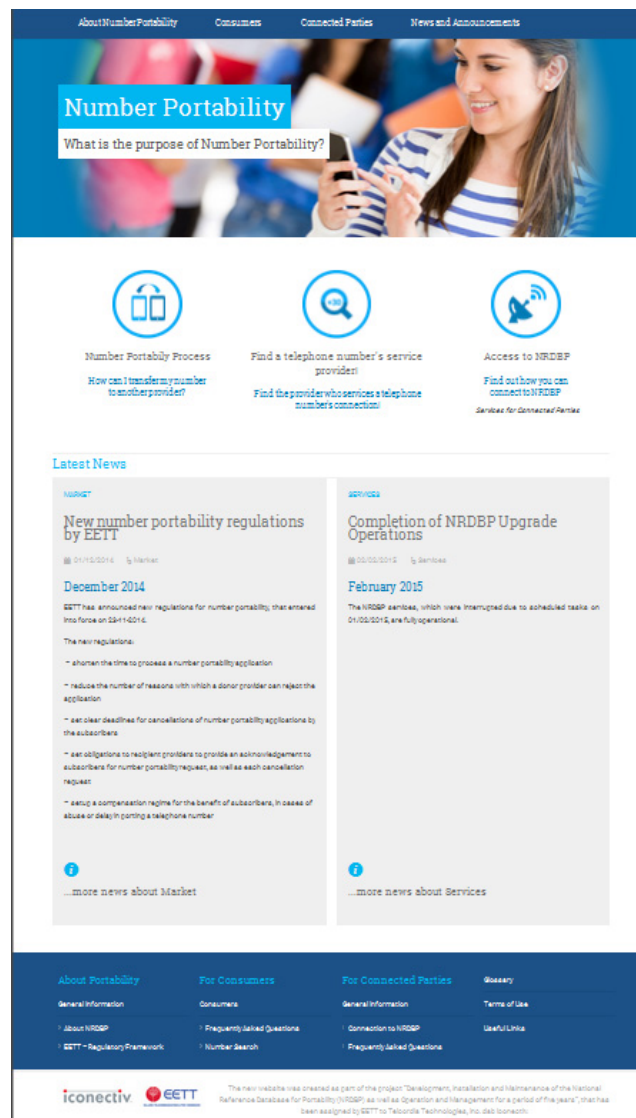
### 5.3.1. The number portability website ([www.foritotita.gr/](http://www.foritotita.gr/) [www.numberportability.gr/](http://www.numberportability.gr/))

The new mobile and fixed telephone number portability website ([www.foritotita.gr/](http://www.foritotita.gr/) [www.numberportability.gr/](http://www.numberportability.gr/)) is available since late September 2014 (See Figure 5.2). It was created under the “Development, installation and maintenance

of the National Reference Database for Portability (NRDNP) as well as operation and management for a period of five (5) years”, a project that was outsourced at the beginning of the year (see Section 6.1.13). The website provides useful information in greek and english, regarding the portability of numbers and the operations of NRDNP which functions as the main point of information exchange among the providers for the number portability processes.

The number portability website provides operators with an online form to submit their requests for connection to NRDNP. It publishes market news as well as announcements about NRDNP services. The website presents to consumers information on number portability, answers to frequently asked questions and provides useful links to EETT and European Commission’s websites. It also provides the «Find a telephone number’s service provider» online application that ena-

**Figure 5.2: numberportability.gr (home page)**



bles consumer to search for the electronic communications operator offering connection service to a telephone number (See Figure 5.3).

The new tool is especially useful for informing the general public, since due to number portability, the first digits of a telephone number no longer signify the caller's operator (service provider). The new free online application informs if the caller is subscriber to the same network and therefore assists him/her to assess the cost of the call based on the telecoms services package. Meanwhile, the general public can use this application in other cases, e.g., in the case a subscriber wants to detect the provider holding a premium rate number in order to file a complaint in the case he/she wants to

check whether his number portability request has been successfully completed and the phone number has been transferred to the new provider.

### 5.3.2. Operational Program «Digital Convergence» (NSRF 2007-2013): Price Observatory for telecommunications and postal retail services

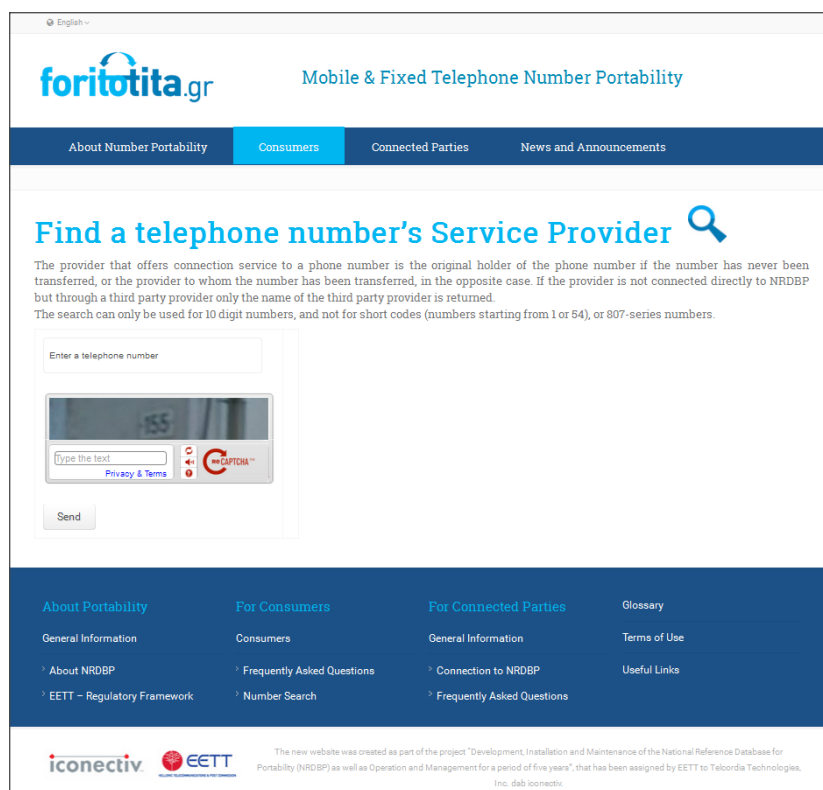
In early August 2014, the implementation of the project called «Price Observatory for telecommunications and postal retail services» was launched. Project contractor is the union of companies «PRICEWATERHOUSECOOPERS BUSINESS SOLUTIONS SA» and «IKNOWHOW SA». This project is the final version of the electronic communications product price

monitoring System that has been developed and operated by EETT and consists of two subsystems, namely the electronic standardized pricing data Observatory and the electronic standardized pricing data Repository as well as the relevant management system.

Through a secure web-based service, the operators will be able to update the electronic Repository with the primary retail pricing data of electronic communications and postal services. The pricing data will be available in greek and english. The pricing data and the data communication format will follow a standard interface so that the operators data will be uploaded automatically.

By retrieving data from the Repository, the electronic Observatory will

**Figure 5.3: Online application: «Find a number's provider»**





provide consumers with the ability to compare retail prices of the electronic communications and postal services provided in the Greek market. Specifically, the system concerns fixed and mobile telephony, fixed and mobile broadband, IPTV as well as combinations of the above services.

In the scope of this project, a web enabled management system will be implemented. It will include a series of functions to automate the administration of subsystems, users and data.

The project cost is around 341,000 euros (plus VAT) and, according to the plan, the implementation will be completed late in the third quarter of 2015.

### **5.3.3. Operational Program «Digital Convergence» (NSRF 2007-2013): System for measuring and presenting the quality indicators for electronic communication networks**

The project aims to better inform consumers about their choices, to intensify the competition in the market, to encourage investment and to strengthen the State's ability for targeted development interventions. The project, which is expected to be completed within 2015, includes two sub-projects:

(a) An interactive system for visualising the measurements of the electronic communications' quality indicators.

(b) A study about the international practices used in measuring the electronic communications' quality indicators for current and new technologies and their adaptation

to the greek telecommunications market and the regulatory framework.

*For more information about this project, see Section 7.1.1.*

### **5.3.4. HYPERION: System for the evaluation of broadband connections' quality**

HYPERION ([hyperiontest.gr](http://hyperiontest.gr)) is an innovative, reliable and easy-to-use system for assessing the quality of fixed broadband connections developed by EETT, based on the Measurement Lab Partnership (M-Lab) platform. It is a web tool addressed to end-users/consumers who wish measurement results instantly and do not necessarily have technical training. HYPERION, as can be seen in Figure 5.4, offers a simple graphic interface to the user thus enabling him/her to easily measure the actual speed and the quality characteristics of their broadband connection, view their measurements' history and browse the geographical map with aggregated statistical data for the performance of broadband connections at different zoom levels.

In 2014, HYPERION gained more than 20,000 new users while more than 3,500 were registered and measured the performance and the actual speed of their ADSL or VDSL connection. Overall, by the end of 2014, approximately 15,000 users were registered to HYPERION having carried out in total approximately 100,000 NDT and 9,000 Glasnost measurements.

Also during 2014, EETT developed a system for measuring mobile

broadband which is now in a test mode.

### **5.3.5. Geographic Information System (GIS) for the postal network**

EETT's Postal Geographic Information System, which is available at its website since 2012, aims at the provision of direct and reliable information to consumers regarding the postal points of service. In 2013, EETT presented the same application for smart phones in iOS and Android operating systems.

In both versions, the application enables the user to search the nearest point of service (ELTA post offices and agencies, courier services, outdoor mailbox clusters, exemptions from every day delivery, collection letterboxes and BEP collection letterboxes). Through a "friendly" menu, the user selects the postal point of interest and navigates in the map. For every point of interest, the application provides all available information (i.e., hours of operation, telephone number, fax number, location etc.) and shows the optimum route from current location to the selected point.

EETT has upgraded the Geographic Information System (GIS) with the use of Silverlight technology in order to ensure their uninterrupted use in all web browsers, faster management of geographical features and enhanced presentation to users. In 2015, the application will also be available in english.

During 2014, the website had 2,065 visits, while 458 users downloaded the smart phone application. The

upgrade, maintenance and data update of the GIS are regularly performed by EETT.

## 5.4. Informative Actions

### 5.4.1. Publications

#### Magazine “Communications In High Speed”

EETT continued to publish its quarterly informational magazine “Communications in High Speed” both in greek and in english. It contains articles on EETT initiatives and actions and articles by senior

government actors and representatives of international Regulators. It is distributed to more than 3,500 recipients.

#### Electronic “NewsIETTer”

In an effort to communicate and provide information on a more regular basis, EETT continued to publish the electronic newsletter entitled “NewsIETTer”. It contains news in brief and announcements on initiatives, public consultations, decisions and other developments related to what is

happening at EETT and is sent on a fortnightly basis to more than 3,500 recipients.

#### Annual market review

EETT issues the annual “Market Review” presenting the course of the supervised markets with data, detailed tables and comparative information from corresponding markets of other EU member states. The data are collected by EETT based on questionnaires, published reports and balance sheets as well as the European Commis-

Figure 5.4: HYPERION (home page)

The screenshot shows the HYPERION website interface. At the top, there is a navigation menu with links for 'Home page', 'Log-in', 'Register', 'RSS', 'Sitemap', and 'Help'. Below this is a secondary menu with 'About us', 'HYPERION', 'New measurement', 'Video', and 'Contact'. The main content area is split into two columns. The left column contains a promotional message: 'How fast is your internet? Your participation...counts!' followed by a brief description of the service and a 'Sign in' button. The right column contains a login form with fields for 'E-mail' and a password, a 'Remember me' checkbox, and a 'Sign in' button. Below the main content, there are three tool cards: 'NDT Network Diagnostic Tool', 'Glasnost', and 'M-LAB Notifier'. The 'Map' section displays a map of Greece with various cities marked and color-coded by broadband speed. A legend at the bottom of the map indicates speed ranges: < 4 Mbps (purple), 4 - 8 Mbps (orange), 8 - 16 Mbps (light blue), 16 - 24 Mbps (dark blue), 24 - 35 Mbps (green), and > 35 Mbps (dark green). A note at the bottom of the map section states: 'Note: The locations and technical features of the broadband connections have been provided by the service users themselves, who are entirely and exclusively liable for their accuracy. The speed resulting from the measurement as the final speed of the connection is also affected by a series of factors, such as the quality of cables, connections and equipment or electromagnetic interference. It should be noted that the maximum theoretical speed, using ADSL and VDSL technology, is based on the estimated distance of the connection from the local exchange.' At the bottom of the page, there is a footer with the EETT logo, MLAB logo, and a counter showing 'HYPERION participants till today: 13743'. The footer also includes links for 'Home page', 'About us', 'Terms of use', 'Contact', 'Sitemap', 'Log-in', and 'Register', along with the version 'v1.1 © 2013 EETT'.



sion's Digital Agenda Scoreboard, usually issued each year in June.

### **Annual postal market review**

On an annual basis, EETT in collaboration with the postal service providers registered on its registry, collects and presents quantitative information pertaining the competitive environment, financial data, statistics and trends of the postal market. This market study seeks to present a comprehensive insight of the industry's characteristics and special features.

*EETT's publications and annual studies are available at [www.eett.gr](http://www.eett.gr).*

### **5.4.2. Press Conferences – Events**

#### **Press Conference on «Regulatory strategy and EETT's action plan for 2014»**

On 18-03-2014, a press conference at EETT headquarters was held, presenting EETT's regulatory strategy and the annual action plan. After a brief review of the previous year, the initiatives and actions planned for 2014 were extensively described.

#### **Press Conference on «Tender process for granting radio spectrum for mobile telephony in the 800MHz and 2.6GHz bands»**

On 13-10-2014 and following the completion of the auction for granting mobile radio spectrum in the 800MHz and 2.6GHz bands, a press conference took place for the final evaluation of the auction and the announcement of the results. During this press conference, the importance of the al-

location of licenses for the digital dividend was highlighted in financial and market terms but also from the consumer's point of view as well as the importance of meeting the Digital Agenda 2020 goals.

#### **Event for «Granting rights to use radiofrequencies in the bands of 800MHz and 2.6GHz to mobile operators»**

On 30-10-2014, in an event with the participation of the heads of the three providers who received licenses of rights in the 800MHz and 2.6GHz bands, the contracts were signed, signaling the typical completeness of the process.

#### **Workshop of EETT's Regional Office in Heraklion**

On 15-12-2014, EETT's Regional Office in Crete organized a workshop on its projects, the synergies with STEP-C (Science and Technology Park of Crete) as well as the research activities of the Foundation for Research & Technology Hellas (FORTH). The workshop was organized in collaboration with STEP-C at FORTH premises. It is worth noting that EETT's Regional Office in Crete, since its forming back in 2011, has handled a total of 410 cases involving signal interference in CAA and Security Forces frequencies, interference to mobile networks, autopsies at mobile communications antennas, control and detection of illegal broadcasting emissions etc.



# 6

## 6.1. EETT's regulatory actions in the electronic communications market

### 6.1.1. Market analysis based on the European regulatory framework

According to the regulatory framework for the electronic communications' networks and services, EETT is responsible for carrying out both a definition and an analysis of the relevant markets in

Greece as well as for imposing any necessary regulatory obligations (on a case by case basis) when it ascertains that a certain market is not adequately competitive. During this process, EETT took into particular consideration the Recommendation on the relevant product markets<sup>28</sup> as well as the guidelines on market analysis and assessment of significant market power<sup>29</sup> of the European Commission.

### Interconnection markets

In the context of the third round of electronic communications market analysis, EETT examined the wholesale interconnection markets<sup>30</sup>, taking into account the national market conditions shaped by the second round of analysis and the submitted comments of the relevant public consultation<sup>31</sup> with the greek market. Then, it notified<sup>32</sup> the proposed Draft Measures to the European Commission, the Body of European

28. European Commission's Recommendation of December 17<sup>th</sup>, 2007 on relevant product and services markets within the electronic communications sector amenable to ex ante regulation in accordance with Directive 2002/21/EC of the European Parliament and of the Council on a common regulatory framework for electronic communications networks and services (EU L 344/65, (2008/879/ EC) 28-12-2007).

29. Commission guidelines on market analysis and the assessment of significant market power under the Community regulatory framework for electronic communications networks and services (2002/C 165/03).

30. Markets 2 and 3 of the 2007 Recommendation, market 10 of the former 2003 Recommendation.

31. EETT decision no. 698/25/25-07-2013.

32. EETT decision no. 706/9/06-02-2014.



# ELECTRONIC COMMUNICATIONS

In 2014 EETT issued the new number portability Regulation and decision on the wholesale interconnection markets. At the same time and having established an open communication channel with the market, EETT conducted public consultations for the amendment of the reference interconnection order and of the Regulations on collocation and on the management and assignment of [.gr] domain names. It also amended the reference offer for the wholesale broadband access and the Regulation on number management and assignment. Furthermore, the Authority submitted its recommendation to the Ministry of Infrastructure, Transport and Networks regarding the reasonable request for Universal Service and the measures that should be taken for the networks' integrity in case of emergency. Last, EETT, in the context of its supervisory role, carried out approximately 240 compliance audits of the operators or/and electronic communications services for issues regarding number portability, Multimedia Information Services (MIS) etc.

Regulators for Electronic Communications (BEREC) and the National Regulatory Authorities (NRAs) of the European Union (EU) member states.

Taking into consideration the final comments submitted by the European Commission<sup>33</sup>, EETT issued a decision<sup>34</sup> adopting the final measures for the regulation of the following distinct markets:

- Wholesale call origination on the public telephone network provided at a fixed location.
- Wholesale call termination on individual networks provided at a fixed location.

- Wholesale transit services in the fixed public telephone network.

By applying the three criteria test for the wholesale transit market, EETT ascertained that there are clear indications that there are no longer high entry barriers in the market (failure of the first criterion) and thus there is no need for ex ante regulation. Subsequently, upon examining the relative power of OTE and of other operators, based on the market share and the progress of the market, the possibility of potential competition and the lack of countervailing purchasing power, EETT concluded that:

(a) the wholesale origination and wholesale termination markets are still characterised by lack of competition, (b) OTE must be designated as an operator with SMP in the defined relevant markets and (c) every operator that provides wholesale termination services is a SMP operator on its network. In order to address the current and potential competition problems, EETT in its final decisions maintained and in certain cases amended the regulatory obligations imposed on OTE and on operators, which were: access provision and use of network related facilities, transparency, non discrimination, cost orientation/

33. Ref. No. EETT 11277/17-03-2014 European Commission's letter C (2014)1690 final, 10-03-2014.

34. EETT decision no. 714/19/10-04-2014 (GG 1049/B/28-04-2014).



cost accounting and accounting separation (only for OTE).

### 6.1.2. Interconnection

#### Reference Interconnection Offer (RIO 2014)

Pursuant to EETT's decision<sup>35</sup> OTE submitted its recommended reference interconnection offer for 2014 which was placed under public consultation for the period 31-07-2014 to 30-09-2014 and then later was extended to 14-10-2014 at the request of the interested parties. Overall, seven operators responded and EETT posted them on its website excluding those that were characterized as confidential.

EETT examined the submitted comments in relation to the current market conditions and OTE's obligations according to the relevant decision. The final version of the decision regarding the reference interconnection offer is in the final stage of formulation by EETT and will be ready in 2015.

As far as OTE's confirmatory application against EETT's decision<sup>36</sup> pertaining the sharing of interconnection cost with HELLAS ON LINE for a specific time period, the Authority decided<sup>37</sup> to partially accept it. The confirmatory application was submitted by OTE on 02-10-2013.

### 6.1.3. Bottom-up fixed telephony model

EETT released its answers to the remarks made by the participants in the public consultation regarding the pure bottom-up long-run incremental cost (LRIC) model that will be used for calculating the wholesale termination rates on fixed networks. Then, it notified the model and the governing methodological principles to the European Commission, BEREC and the NRAs and answered to the questions set by the European Commission. EETT, taking into special consideration the Commission's remarks, proceeded to formulate its final decision<sup>38</sup>.

### 6.1.4. Local loop unbundling (LLU)

The number of local loops operating in the entitled providers' networks increased in December 2014 to 2,016,000 as compared to 1,908,000 in December 2013 (5.6% increase).

#### Amendment of RUO

EETT carried out a public consultation regarding the suggestion for amending the reference offer for full and shared local loop and sub-loop submitted by OTE, pursuant to its relevant obligation<sup>39</sup>. EETT took into consideration and studied OTE's recommendations

as well as the remarks made by the telecommunication operators in the public consultation. In 2015, the Authority will proceed to amend the reference offer for full and shared local loop and sub-loop and the related services and will issue a relevant decision.

The main points of the public consultation are the following:

- clarifying the questions made by the operators in the following e-mail address «dep-llu@ote.gr»,
- matters regarding letters of guarantee, such as renewal, forfeiture etc.,
- matters regarding loop selection/rejection reasons,
- matters regarding scheduled and un-scheduled tasks/works,
- matters regarding the procedure for fault repair,
- provision for charging OTE with a fee for the unnecessary visit of an operator's crew in specific fault cases,
- updating procedures such as the distribution of the resources for physical collocation, the availability of pairs of internal link cable (ILC) and of optical fibre cables (OFC) and others and

35. EETT decision no. 714/09/10-04-2014 «Definition of call origination (wholesale) markets on the public telephone network at a fixed location and of call termination markets on individual networks at a fixed location, designation of enterprises with significant power in the said markets and their obligations (3<sup>rd</sup> round of market analysis). (b) Deregulation of the transit services' market in the fixed public telephone network» (GG 81049/B/28-04-2014).

36. EETT decision no. 695/59/27-06-2013 «Decision on the dispute settlement procedure of the 20<sup>th</sup> September 2012 between the enterprises «HELLAS ON LINE» and «OTE SA» under article 34 of L. 4070/2012 regarding the procedure of sharing the cost of interconnection links».

37. EETT decision no. 729/33/31-07-2014 «Decision on OTE's confirmatory application against EETT decision no. 695/59/27-06-2013».

38. EETT decision no. 714/09/10-04-14 (GG 1049/B/28-04-2014).

39. EETT decision no. 707/11/13-02-2014.

- updating the pricelists for fees and the fault code table.

### **Amendment of RUO: Virtual partial unbundled loop (VPU) (EMA light)**

In the process of rolling out Next Generation Networks (NGN) and replacing the current time division multiplexing (TDM) technology services with voice over broadband technology services, OTE submitted a proposal to EETT regarding the provision of a new wholesale VPU light or EMA light product. This new wholesale products enables the operators to replicate the services that OTE provides via Next Generation Access Networks (NGA) of Fiber to the Curb (FTTC) architecture, ensuring in this way the principle of non-discrimination.

This product entails the provision of wholesale broadband access of VDSL2 technology without being necessary for end-user to receive voice or wholesale line rental (WLR) services from OTE or LLU from the operator. OTE also submitted the technical and the commercial description as well as the proposed EMA light prices. EETT carried out the relevant public consultation that was concluded on 15-12-2014.

### **6.1.5. Wholesale broadband access**

Following the relevant public consultation, EETT decided<sup>40</sup> to amend some provisions of OTE's reference

offer for the wholesale broadband access (WBA), namely the procedures for providing EMA or VPU as well as other individual issues suggested by OTE and assessed by EETT having taken into consideration the remarks of the participants in the consultation.

### **6.1.6. Elaboration of the collocation Regulation**

Pursuant to article 29 of L.4070/2012, EETT is in the position to impose the collocation or/and the joint use of facilities or other property of the electronic communication operators, especially when the duplication/overlapping of infrastructure is economically inefficient or simple impracticable for another operator.

The recently issued Directive 2014/61/EU<sup>41</sup> emphasizes the importance of high-speed electronic communications broadband networks and acknowledges the need for policies that will reduce the roll-out cost. At the same time and in order to encourage the deployment and the effective operation of broadband networks, the Directive requires member states to ensure that any network operator has the obligation to meet all reasonable requests for access to its physical infrastructure under fair and reasonable terms and conditions, price included. Especially for wireless networks, the implementation of the regulation promotes environmental protection.

EETT concluded that the evolution of the electronic communications fixed networks in Greece pertains mainly, if not exclusively, to high-speed broadband networks since the current access network is gradually replaced by NGA, while the backbone networks have already been rolled out or replaced by NGN. At the same time, EETT acknowledged that when deploying broadband networks in Greece, as it the case across the EU, the duplication of infrastructure would be financially inefficient and under conditions impracticable.

To this end, EETT carried out a public consultation in the period 06-02-2014 to 06-02-2015 regarding the collocation Regulation draft and particularly the obligation of providing collocation and the joint use of facilities when deploying high-speed electronic communications broadband networks. EETT's collocation Regulation was issued in March 2015.

### **6.1.7. Universal Service**

#### **Performance targets**

Following EETT's decision<sup>42</sup> on reducing the density of OTE's public payphones (0.35 public payphones per 200 inhabitants), the latter is obliged to submit semi-annual reports to EETT, which will reflect the number of public payphones removed until the limit specified by the decision is reached. The reduc-

40. EETT decision no. 729/10/31-07-2014 (GG 2405/B/09-09-2014).

41. Directive 2014/61/EU/15-05-2014 «Measures to reduce the cost of deploying high-speed electronic communications networks».

42. EETT decision no. 697/15/18-07-2013 «Amendment of EETT decision no. 472/170/21-03-2008 «Regulation on determining performance targets for the provision of Universal Service, determination of the content and the form of the information for publication as well as the manner of its publication by companies under the obligation of Universal Service (GG 885/B/14-05-2008)» (GG 1876/B/31-07-2013).



tion of the public payphones' number was deemed necessary since their use was considerably limited due to mobile telephony and the high maintenance cost. According to OTE semi-annual reports, 306 public payphones were removed in 2013, while in the first semester of 2014 this number stood at 2,101 public payphones nationwide.

### **Recommendation to the Ministry of Infrastructure, Transport and Networks regarding the reasonable request of Universal Service**

Pursuant to article 57 of L.4070/2012, the Universal Service Provider (USP) is obliged to meet every reasonable request for access to the public telephone network and the provision of public telephone services. On EETT's recommendation, the Ministry defines the meaning, the criteria and the content of the reasonable request.

In this context, a public consultation on EETT's relevant decision took place in the period from 20-01-2014 to 20-02-2014. The text of the final recommendation to the Ministry was formatted<sup>43</sup> taking into consideration the submitted remarks, the European practice as well as the USP's current practice. More analytically, a request is deemed to be reasonable, if:

a) in the case of wired public communications network, the requested access point is up to 200 meters (on a public road or through the applicant's property) from the nearest distribution box of the operator's public communications network or

b) in the case of wireless public communications network, the requested access point lies within the network's coverage area or

c) the estimated maximum implementation cost of connecting (wired or wireless) the access point to the public communications network does not exceed the maximum amount of 1,900 euros plus VAT. This figure applies for the publication year of this recommendation and for every subsequent year is adjusted to last year's annual inflation. The relevant ministerial decision<sup>44</sup> was published following EETT's recommendation.

### **New USP designation**

Having been the USP for the minimum three years, OTE notified EETT that it does not wish to remain USP anymore. In this context, the tender document regarding the auction for the designation of the USP was drafted and placed under public consultation in the period from 10-10-2014 to 23-10-2014 while on 09-12-2014,

EETT published its views on the submitted comments/remarks. The tender document for the designation of the USP was published in the end of March 2015.

The procedure to be followed includes carrying out a two-stage tender process: in the first stage the parties submit their initial financial offer along with the application form while in the second stage a multiple round tender process at a diminishing price takes place.

The US elements relate to the following services for the greek territory:

- a) provision of access at a fixed location and provision of telephony services,
- b) telephone directory services and subscribers' directory,
- c) public payphones and other access points to public telephony.

The designation of an operator as the USP lasts for at least three years.

It should be noted that EETT had already decided<sup>45</sup> to publish a call for expression of interest for the provision of the entire US or parts of it for the period from 17-03-2014 to 30-06-2014. The following companies expressed their interest:

43. EETT decision no. 714/005/10-04-2014 «Approval of the recommendation draft to the Ministry of Infrastructure, Transport and Networks regarding the determination and the specification of the meaning, the criteria and the content of the reasonable request of the Universal Service pursuant to article 57 of L.4070/2012».

44. Ministerial decision no. 44871/988 «Determination and specification of the meaning, the criteria and the content of the reasonable request of the Universal Service» (GG 2128/B/04-08-2014).

45. EETT decision no. 710/15/13-03-2014.

Company	US Elements	Fulfilled criteria (Article 4 MD 28120/974/11-05-2007)
Newsphone Hellas SA	Telephone directory services and subscribers' directory on paper and in electronic format.	1a 1b (reliability criteria iii and v)
Forthnet SA	Provision of access at fixed locations and provision of telephone services for the entire territory.	1a 1b (reliability criteria i, ii, iii, iv and v)
OTE SA	A. Provision of access at fixed locations and provision of telephone services for the entire territory. B. Telephone directory services and subscribers' directory on paper and in electronic format. C. Public payphones and other access points to public telephony.	1a 1b (reliability criteria i, ii, iii, iv and v)

## Compensation request

OTE, as the USP, submitted in time to EETT the cost-accounting data for the calculation of the net US cost for the years 2010, 2011, 2012 and 2013, pursuant to the current regulatory framework<sup>46</sup>. EETT issued relevant decisions<sup>47</sup> commissioning the audit of the net US cost for the years 2010 and 2011 to an independent auditor. The audit process is expected to be completed in the first semester of 2015.

### 6.1.8. Examination of OTE's bundled services/economy programs

OTE's economy programs that include bundled services are audited by EETT in the context of the former's regulatory obligation as

an operator with SMP in the retail access markets in order to deter practices of margin squeeze. The audit is carried out in accordance with the methodology and the model set out in Appendix I "Methodological definition and general principles for the examination model of individual and/or bundled services tariff plans of companies with Significant Market Power", set forth in EETT's relevant decision<sup>48</sup>. During 2014, OTE submitted 120 economy programs of which 100 were approved, while the remaining 20 -that were submitted in the last 10 days of December- were still being processed as of 31-12-2014.

In 2014 EETT, in promoting fair competition and market transparency and in accordance with the current regulatory framework, de-

veloped and operated the web application «Preliminary Test Module (PTM) of economy programs» or simply «mini model». This application is based on the main price squeeze model used by EETT for the pre-audit and approval of OTE's economy programs for individual or bundled services of fixed access to telephony or/and Internet. By using this application:

- OTE can on its own carry out a preliminary audit of its economy programs prior to their submission to EETT in order to speed up the procedure of examination and approval by the Authority and
- the alternative operators can primarily examine the ability to replicate each of OTE's economy programs.

46. Ministerial decision no. 28120/974/11-05-2007 «Conditions, selection criteria and procedure for the designation of the Universal Service provider» (GG 824/B/25-05-2007).

47. EETT decisions no. 670/09/01-11-2012 «Award of the low-value tender summarily for selecting a contractor for the project «Audit of the study regarding the determination of net Universal Service cost for 2010 submitted by OTE» to the enterprise «SVP Advisors»» and no. 695/032/27-06-2013 «Delegation of additional services to the enterprise «Axon Partners Group Consulting SL» by extension of the contract no. 51/2012 under the title «Audit of the study regarding the determination of net Universal Service cost for 2010 submitted by OTE».

48. EETT decision No. 595/013/10-03-2011 "Definition of the national retail markets of publicly available telephone services at a fixed location, designation of operators with significant market power in the said markets and their obligations (2<sup>nd</sup> round of market analysis)" (GG 533/B/06-04-2011).



It is mentioned that this application is exclusively for the operators and its results are not binding EETT. To further enhance the confidentiality assurance, EETT certified each and every user from each operator, allowing the access only to certified users. In order to inform and train the operators when using this application, EETT organized in November 2014 a meeting for the certified users where the Authority presented in detail the parameters of the model and the way that those are inserted in the application.

### 6.1.9. Cost-accounting audits

EETT, in cooperation with independent chartered auditors, has carried out and completed the 2014 cost-accounting data with actual data for 2012 and forecasted data for 2013 and 2014. The audit started at the end of September 2013 and was completed on 22-05-2014.

EETT approved<sup>49</sup> the results of OTE's cost-accounting audit, stipulating the pricelists for the services with respect to the regulated wholesale markets for which OTE is subject to regulatory obligations for price con-

trol, cost accounting and accounting separation on the one hand, and relating to the regulated retail markets for which OTE is subject to the obligation for cost-oriented price control, on the other.

This cost accounting audit referred to a range of services<sup>50</sup> whose costs have been defined on the basis of the following two costing methods: (a) long run average incremental cost (LRAIC) and (b) fully distributed cost (FDC).

Furthermore, in compliance with EETT's respective decisions<sup>51</sup>, OTE posted on its website<sup>52</sup>, the cost accounting data and in particular the reference models of the LRAIC cost accounting system (LRAIC tables). This action contributes to the promotion of transparency in the electronic communications market, given that it enables other operators to gain an insight to the individual costs comprising the wholesale price of the most significant regulated services, for which OTE has the obligation of cost-orientation.

Following a consultation, EETT decided<sup>53</sup> in August 2014 to amend the regulation governing the principles/methodology of cost-accounting and

accounting separation in order to comply with EETT's published decisions on market analysis. The publication of this decision in the GG Issue initiates its implementation.

### 6.1.10. Regulated price control

EETT, as part of its competences to check OTE's price lists in the markets where it holds a dominant position and its compliance with its related obligations, set<sup>54</sup> the following price caps for the regulated retail access services and telephone services:

#### Retail access services

The cap for OTE's average retail price was set at 13.44 euros, not incl. VAT, for the following fixed access products:

- one-off connection fee for PSTN,
- PSTN monthly rental,
- one-off connection fee for ISDN-BRA and
- ISDN-BRA monthly rental.

It is mentioned that, by mid-2013 EETT has deregulated<sup>55</sup> the retail services of publicly available local and national telephone services at a fixed location.

49. EETT decision no. 719/01/22-05-2014.

50. Interconnection, LLU (including collocation services), WBA, leased interconnection lines, wholesale and retail end-to-end leased lines and number portability.

51. EETT decisions no. 482/051/24-06-2008 (GG 1151/B/24-06-2008), no. 562/029/22-04-2010 (GG 668/B/18-05-2010) and no. 573/11/22-07-2010 (GG 1348/B/01-09-2010).

52. <https://www.ote.gr/web/guest/corporate/company/who-we-are/profile/ypodeigmataanaforas>

53. EETT decision no. 728/3/24-07-2014 (GG 2201/B/11-08-2014) titled: Amendment and codification of EETT's decision no. 482/051/2008 «Methodologies/Principles of cost-accounting and accounting separation when implementing the regulatory obligations of price control, cost-accounting and accounting separation imposed on the operator designated as having SMP in the individually defined electronic communications markets» (GG 1151/B/24-06-2008).

54. EETT decision no. 640/016/21-02-2012 (GG 755/B/14-03-2012).

55. EETT decision no. 696/125/11-07-2013 «Partial repeal of EETT's decision no. 595/013/10-03-2011 (GG 533/B/06-04-2011), in the context of the 3<sup>rd</sup> market analysis round of the national calls market provided to residential and non residential customers at a fixed location in Greece (calls to geographic and non geographic numbers in Greece), [pursuant to point 6 of the 2008/850/EC European Commission's Recommendation regarding the notifications, the deadlines and the consultations, of the article 7 of 2002/21/EC Directive, as amended and of article 16 of L.4070/2012 (GG 82/A/10-04-2012) as in effect (GG 1865/B/30-07-2013)].

### 6.1.11. Accounting separation

#### Fixed telephony

In the context of the 2014 cost-accounting audit based on the 2012 actual data, OTE has submitted its accounting separation statements for audit and posted the statements and methodology of the accounting separation on its website in June 2014. This decision was amended in August 2014 (see Section 6.1.9).

#### Mobile telephony

EETT set up<sup>56</sup> a working group that consisted of competent executives of the Authority, the project's contractor and representatives of the three mobile telephony operators in order to find a common methodology for common cost allocation, so that the information submitted by the mobile telephony operators in the accounting separation reference models will be comparable, thus implementing as efficiently as possible this measure. The working group completed its work thus initiating the procedures for the final format and implementation of this specific measure.

### 6.1.12. Competition cases

#### Case progress of VODAFONE's complaint vs COSMOTE

In February 2014, the hearing regarding VODAFONE's complaint<sup>57</sup> was repeated according to the administrative procedures. More

analytically, VODAFONE filed a complaint on the violation by COSMOTE of the rules of fair competition and the telecommunication legislation in the Greek prepaid mobile telephony market. The relevant hearing took place on 04-06-2014 and the two companies expressed their views on events and information related to the complaint in front of the new hearing committee and submitted their relevant written statements in July 2014. By the end of 2014, EETT was in the process of examining the case's data.

#### Approval of VODAFONE-HELLAS ON LINE merger

On 05-09-2014 EETT was notified about the concentration agreement according to which VODAFONE took common registered shares over from the companies belonging to INTRACOM Group and the company WORLD EQUITIES INVESTMENTS HOLDINGS SA as well as preferred registered shares issued by the company HELLAS ON LINE SA from the company INTRACOM HOLDINGS SA, acquiring in this way the full control over the company HELLAS ON LINE SA. Following the examination of the merger related data, EETT concluded that this development does not hinder the competition in the greek market of electronic communications and on 18-09-2014 approved<sup>58</sup> the acquisition of the company HELLAS

ON LINE's sole control by the company VODAFONE.

### 6.1.13. Number portability

During 2014, number portability decreased approximately by 4.6% compared to 2013. Particularly, out of the 1,116,064 total numbers that were ported, 621,032 pertained to fixed telephony numbers (a 7.1% increase compared to 2013) and 495,032 pertained to mobile telephony numbers (a 16% drop compared to 2013). By the end of 2014, a total of 8,553,590 fixed and mobile telephony numbers were ported. Table 6.1 presents the evolution of the fixed and mobile telephony ported numbers on an annual basis and accumulatively.

#### Number portability Regulation

At the same time, the new number portability Regulation<sup>59</sup> was brought into force on 23-11-2014 introducing the following significant changes:

- Speed-up of the time needed for inspecting and implementing the portability applications. The deadline for inspecting the applications by the current provider was limited to six working hours from one working day resulting in the reduction of the time needed for the implementation of portability. This reduction is particularly strong in the mobile telephony since it enables a subscriber to port its mobile number within the same day.

56. EETT decision no. 722/2/19-07-2014.

57. Ref. No. EETT 12073/26-03-2012.

58. EETT decision 733/047/18-09-2014 (GG 2680/B/08-10-2014).

59. EETT decision no. 696/115/2013 (GG 1873/B/31-07-2013) as amended by EETT decisions no. 708/14/20-02-2014 (GG 557/B/06-03-2014) and no. 735/006/09-10-2014 (GG 2986/B/05-11-2014).



- Limitation of the reasons for rejecting a portability application. Analytically, the grounds for rejection, under which the current operator can reject a portability application due to inaccurate data, came down to what is necessary for identifying a subscriber (TIN or ID or passport number). Furthermore on 03-03-2014 the temporary disconnection due to non payments was abrogated as a rejection reason.
- Specification of certain deadlines for the annulment of the portability application. In the case of mobile telephony, the right for annulment can be exercised up till the receipt of the SIM card from the new operator whereas in the fixed telephony up till three workdays prior to the activation scheduled date.
- Confirmation by the operator of all portability applications and their annulment applications. When the application is submitted on paper or in an electronic format, the subscriber receives a copy of his/her application on paper or in an electronic format respectively whereas the application is submitted via fax or telephone, the subscriber receives an SMS.
- Establishment of a subscribers' compensation procedure by the operators. The subscribers obtain the right of compensation from the responsible operator in the cases of considerable delay in the effectuation of the appli-

cation, substantial service loss/disconnection when porting or porting a number without the subscriber's consent or despite the timely submission of the annulment application.

Following the respective open public tender that took place in 2013 regarding the management of the National Reference Database on Number Portability (NRDNP), EETT awarded in February 2014 the contract to «TELCORDIA TECHNOLOGIES INC DBA ICONECTIV», which is contracted to:

- a) implement the NRDNP according to the new portability procedures and pursuant to the arrangements established in the tender process and the new Regulation and
- b) operate and manage the NRDNP for five years from the expiry of the previous contract, namely from 03-03-2014 to 02-03-2019.

The company's fee is paid exclusively from the operators connected to the NRDNP and during the first operational year amounts to 12,500 euros per month plus the number of the completed portability requests for 0.80 euro per completed application (the first 250 completed applications per operator in every month are not charged).

The specification of the new portability procedures, of the NRDNP's relative standards as well as of the timetable for testing the operators' systems with the NRDNP was carried out in a series of meeting

between the contractor, the mobile and fixed operators and EETT. The NRDNP in accordance with the new portability procedures became operational on 23-11-2014, which was the same day that the new Regulation came into effect.

Following the requests submitted by the electronic communications operators for reducing the 500 euro minimum monthly rental paid by every operator in order to connect to the NRDNP, EETT carried out a relative public consultation in August 2014 and decided<sup>60</sup> to set the minimum monthly rental for connecting to the NRDNP at 300 euro as of 01-11-2014.

#### **6.1.14. Quality indicators for electronic communications services**

During 2014, EETT continued to supervise and publish the quality indicators data sent by domestic providers with respect to the quality of fixed telephony network services (POTS/ISDN), fixed broadband services (xDSL) and VoIP services as well as customer care services (order taking, fault reporting, dealing with consumers issues/complaints etc.)

As of the second semester of 2013, the comparable result tables are published in a new format that instructs in detail the operators regarding the values allowed for every table cell. This new format has helped to eliminate any errors made by the operators when submitting the results.

60. EETT decision no. 735/006/2014 (GG 2986/B/05-11-2014).



**Table 6.1: Evolution of fixed and mobile telephony ported numbers (2004-2014)**

Year	Mobile telephony		Fixed telephony		Total	
	Number	Accumulatively	Number	Accumulatively	Number	Accumulatively
2004*	16,123	16,123	1,156	1,156	17,279	17,279
2005	49,641	65,764	27,403	28,559	77,044	94,323
2006	117,767	183,531	44,798	73,357	162,565	256,888
2007	358,517	542,048	300,909	374,266	659,426	916,314
2008	362,601	904,649	562,961	937,227	925,562	1,841,876
2009	486,815	1,391,464	544,039	1,481,266	1,030,854	2,872,730
2010	648,074	2,039,538	631,611	2,112,877	1,279,685	4,152,415
2011	506,413	2,545,951	622,834	2,735,711	1,129,247	5,281,662
2012	459,941	3,005,892	526,478	3,262,189	986,419	6,268,081
2013	589,368	3,595,260	580,077	3,842,266	1,169,445	7,437,526
2014	495,032	4,090,292	621,032	4,463,298	1,116,064	8,553,590

\* It refers to data since the operational start (01-03-2004) of the National Reference Database on Number Portability (NRDNP) which is the special database used in facilitating the implementation of number portability in Greece.

Source: EETT

The following charts present the evolution of the performance of the fixed operators with the largest subscribers' base<sup>61</sup> for selected broadband and customer care indicators both in total and in comparison (alternative operators in relation to the USP, namely OTE). These charts are available at [www.eett.gr](http://www.eett.gr)<sup>62</sup>.

In summary and for all operators, there was a 5.3% increase in the average transmission speed from local exchanges in the first semester of 2014 compared to the respective period of 2013. The time difference for an initial broadband connection<sup>63</sup> between OTE and

the alternative operators for the first semester of 2014 was 14.5 calendar days with a diminishing trend. Furthermore, the alternative operators exhibit a lower call failure rate as well as less time needed for fault repairs. As far as the call failure is concerned, there is a performance convergence of POTS/ISDN and VoIP during the last two semesters. What is more, the customer care quality is in high levels since the average percentage for resolving consumers' complaints ranged at 96.02% in the first semester of 2014, while the average percentage of complaints for billing mistakes is 0.45%.

### 6.1.15. International roaming Regulation

In the context of implementing the international roaming Regulation<sup>64</sup>, the international roaming charges were further decreased in 2014 both at wholesale (fees among the mobile operators) and at retail level (fees on the international roaming users). As of 01-07-2014, an international roaming user travelling to one of the EU countries, as well as to Iceland, Lichtenstein or Norway, will be charged at a retail level, as follows:

- up to 0.19 euro/minute plus VAT for making a call (charge per se-

61. Operators who directly serve more than 50,000 subscribers.

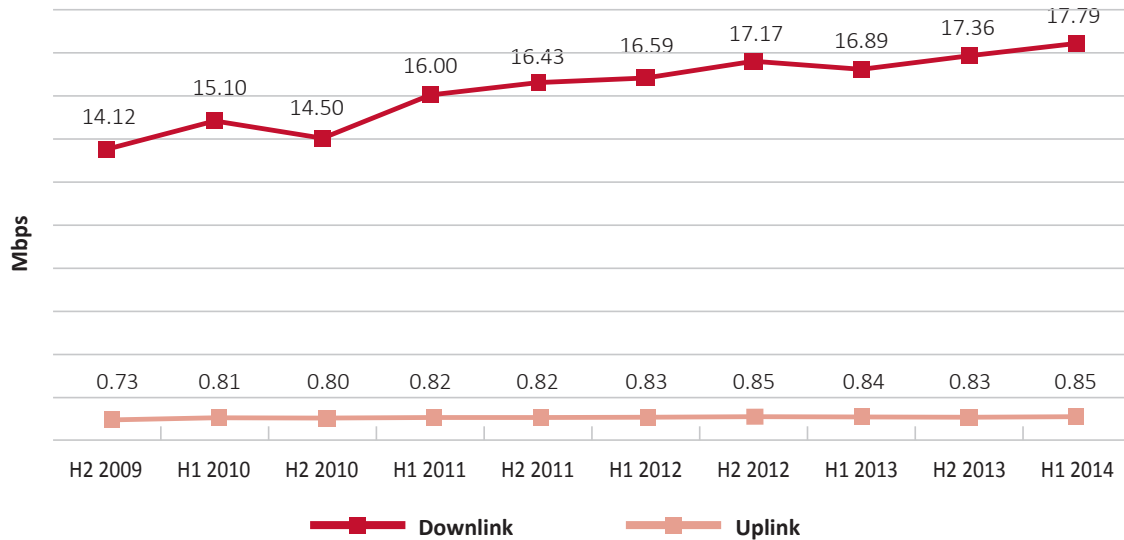
62. The measurement results are published by providers at [www.eett.gr](http://www.eett.gr). However, they are not certified by EETT.

63. The (retail) times in calendar days (integer values), including holidays, needed to complete 95% of the fastest satisfied orders.

64. Regulation (EU) no. 531/2012 of the European Parliament and of the Council of 13<sup>th</sup> of June 2012 on roaming on public mobile communications networks within the EU (<http://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32012R0531&qid=1432197161994&from=EN>).

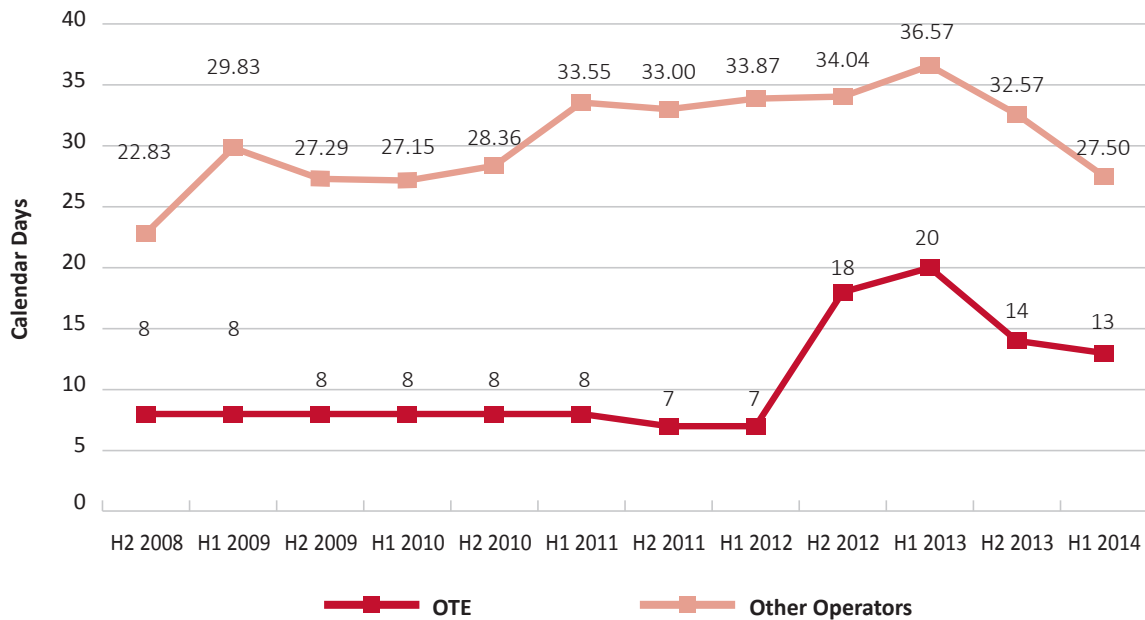


**Chart 6.1: Average data transmission speed achieved by local exchanges (24 Mbps/1 Mbps packs)**



Note: Chart 6.1 presents the operators' average data transmission speeds in the connections of the access network and the backbone network. The average results of the following operators are presented: CYTA, FORTHNET, HELLAS ON LINE, ON TELECOMS, WIND and OTE. The results of FORTHNET are available as of the 1<sup>st</sup> semester of 2010 and for CYTA as of the 1<sup>st</sup> semester of 2011. The results of the 1<sup>st</sup> semester of 2014 do not include ON TELECOMS.

**Chart 6.2: Supply time for initial connection (95<sup>th</sup> percentile)**



Note: Chart 6.2 presents the provision times for the initial broadband connection (Q.I. B05). For OTE the value presented is that of the 95<sup>th</sup> percentile whereas for the alternative operators the average value of the 95<sup>th</sup> percentile is presented. The results for other operators up to the 2<sup>nd</sup> semester of 2010 refer to the companies: FORTHNET, HELLAS ON LINE και ON TELECOMS. As of the 1<sup>st</sup> semester of 2011 CYTA and WIND are included while as of the 1<sup>st</sup> semester of 2012 ON TELECOMS is excluded. The results are based on measurements made by the operators in the direct LLU service.

- cond and initial minimum charging period up to 30 seconds);
- up to 0.05 euro/minute plus VAT for receiving a call (charge per second);
- up to 0.06 euro/SMS plus VAT for sending an SMS;
- no charge for receiving an SMS;
- up to 0.20 euro/MMS plus VAT for sending an MMS;
- up to 0.20 euro/MB plus VAT for using data services (charge per KB).

The aforementioned prices will apply up till 30-06-2017. Furthermore, as of 01-07-2014, the international roaming users will be able to be served by alternative operators beyond their domestic operator having the same SIM card number. EETT examines the compliance of mobile telephony operators with the Regulation and monitors the developments in the international roaming market in collaboration with BEREC and the European Commission.

#### **6.1.16. [.gr] Domain name assignment**

The assignment of [.gr] domain names is steadily increasing. The total number of domain names, including sub-domains (com.gr, net.gr, org.gr, edu.gr, gov.gr) is presented in Table 6.2, whereas Table 6.3 presents the number of assignments compared to applications per month for January-December 2014. The 2014 average assignment percentage in relation to applications was 77%. For reasons of

comparability between the figures appearing in the tables of domain names assigned and applied for, the time reference set corresponds to the date the application was submitted rather than the date on which EETT reached an assignment/rejection decision. It should be noted that almost all applications were examined through an automated process (191,638 out of a total of 191,721 applications) thus allowing for EETT to significantly reduce the waiting time for assigning a domain name. It should be mentioned that the large number of rejections that appear in some months is mainly due to the unavailability of some domain names for assignment.

On 09-10-2014, EETT initiated, via a sealed-bid tender, the procedure of assigning 428 [.gr] domain names whose variable section is an Internet key word. EETT has reserved<sup>65</sup> these specific domain names both as second and third-level domain names ending in com.gr, net.gr, org.gr και edu.gr such as: whois.gr, whois.com.gr, whois.net.gr, whois.edu.gr, whois.org.gr. The suggested opening bid is set at 200 euros which is the minimum valid bid in a [.gr] domain names' auction.

In parallel, EETT carried out a public consultation regarding the Regulation on the management and assignment of [.gr] domain names during the period from 20-11-2014 to 22-12-2014. Two basic changes are the:

- ability to assign a two-character domain name such as 1a.gr and to 1a.com.gr. The new Regulation will enable companies and consumers to choose out of 8,000 domain names with two characters the one that they wish, a possibility that was not feasible under the current Regulation.
- provision of an increased security service for [.gr] domain names. That is that all the data that is associated with a domain name and allow for its smooth operation are in fact "locked". Data such as the contact details of the assignee or the details of the registrar can be changed only by the domain name holder/assignee thus allowing for eliminating any malicious practices that were previously reported to EETT.

Furthermore, two additional amendments that are suggested are the following:

- implementing the IDNA 2008 protocol that will allow for the differentiation of the alphanumeric greek character [ς] from the alphanumeric greek character [σ].
- imposing obligations on the registrars for sticking to the 400 statements limit that are able to register in the system from 23:30 to 01:00 UTC.

The new Regulation was issued in March 2015 and its final provisions will be presented in the 2015 Annual Report of EETT.

65. EETT decision no. 625/002/25-10-2011 (GG 2902/B/21-12-2011).



### 6.1.17. National Numbering Plan

EETT decided<sup>66</sup> to amend the Regulation for managing and assigning numbering resources of the National Numbering Plan (NNP), taking into consideration the remarks submitted during the public consultation that was held from 24-02-2014 to 26-03-2014. The main points that were amended aiming at the efficient management of the NNP's numbering resources were the following:

- the duration of the rights of usage of the numbering resources,
- the way that the fees are paid and the numbering resources are assigned and used,
- format and assignment method of the portability prefixes.

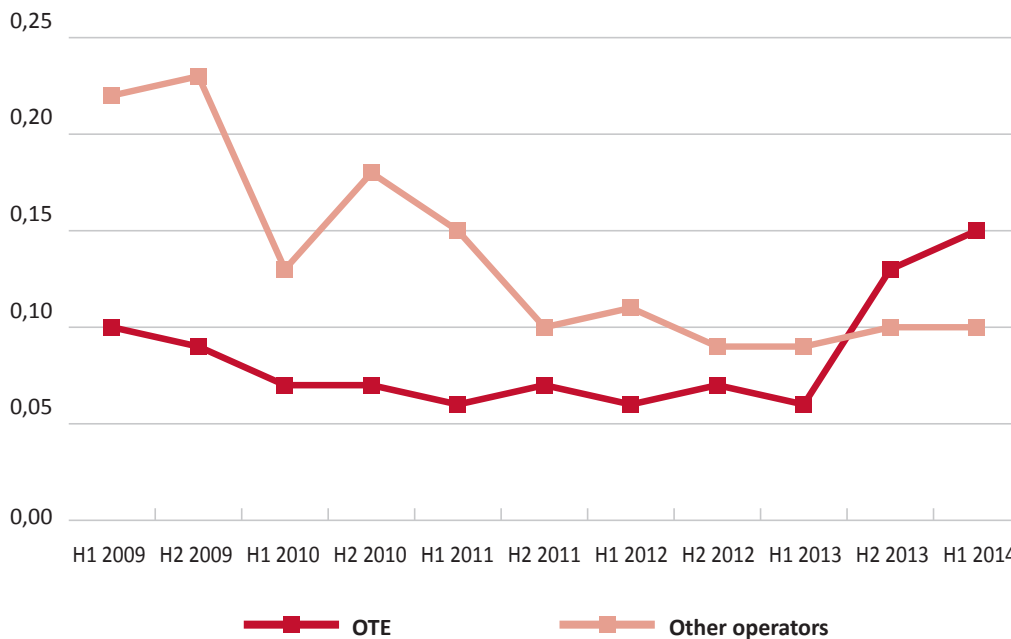
Then, EETT, taking into consideration the remarks submitted during the public consultation that was held from 01-07-2014 to 05-09-2014, decided<sup>67</sup> to re-amend of the Regulation as far as the following were concerned:

- appointment of specific number series for gambling and fundraising activities and
- regulation of issues relating to the numbering resources' fees

### 6.1.18. Amendment of the General Authorisation Regulation regarding the international roaming services provided by an alternative roaming provider (ARP)

Pursuant to article 4 of the international roaming Regulation<sup>68</sup>, as of 01-07-2014 roaming customers will

**Chart 6.3: Fault rate per connection**



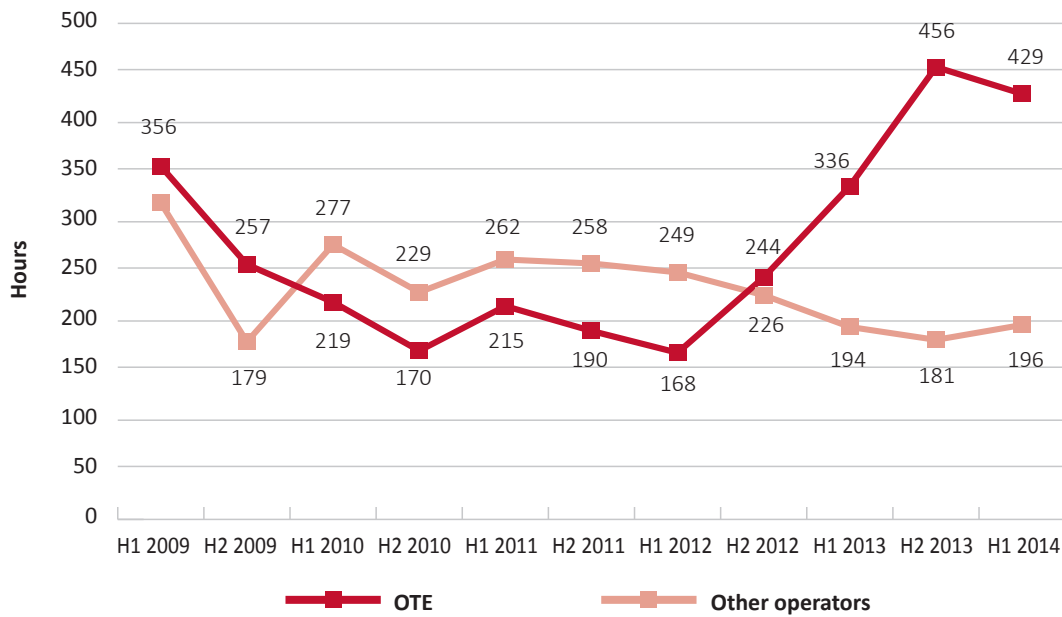
Note: Chart 6.3 presents the number of fault reports per access line (Q.I. B06), namely the fault frequency for OTE and the total of the following operators: CYTA, FORTHNET, HELLAS ON LINE, ON TELECOMS και WIND. CYTA is not included in the 1<sup>st</sup> semester of 2009 and the same applies for ON TELECOMS for the 1<sup>st</sup> semester of 2014.

66. EETT decision no. 714/010/10-04-2014 «Amendment of EETT decision no. 677/03/08-01-2013 «Amendment and codification of EETT decision no. 441/121/21-06-2007 “Regulation on the management and assignment of numbering resources of the National Numbering Plan” (GG 170/B/31-01-2013)» as in effect» (GG 1301/B/22-05-2014).

67. EETT decision no. 737/011/23-10-2014 «Amendment of EETT decision no.677/03/2013 «Amendment and codification of the regulation on the management and assignment of numbering resources of the National Numbering Plan» (GG 3061/B/13-11-2014).

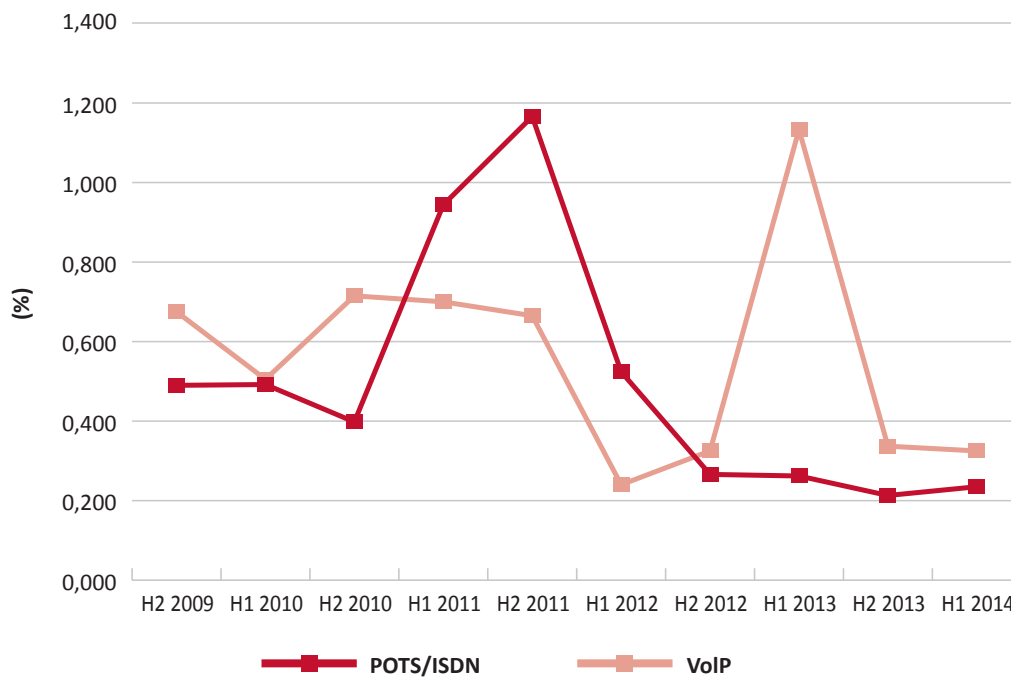
68. Regulation (EU) no. 531/2012 of the European Parliament and of the Council of 13<sup>th</sup> of June 2012 on roaming on public mobile communications networks within the EU.

**Chart 6.4: Fault repair time (95<sup>th</sup> percentile)**



Note: Chart 6.4 presents the fault repair time for broadband access lines (Q.I. B07). For OTE the value presented is that of the 95<sup>th</sup> percentile whereas for the alternative operators (CYTA, FORTHNET, HELLAS ON LINE, ON TELECOMS, WIND) the average value of the 95<sup>th</sup> percentile is presented. The results for other operators up to the 2<sup>nd</sup> semester of 2010 refer to the companies FORTHNET, HELLAS ON LINE, ON TELECOMS. As of the 1<sup>st</sup> semester of 2011, CYTA and WIND are included while as of the 1<sup>st</sup> semester of 2012 ON TELECOMS is excluded.

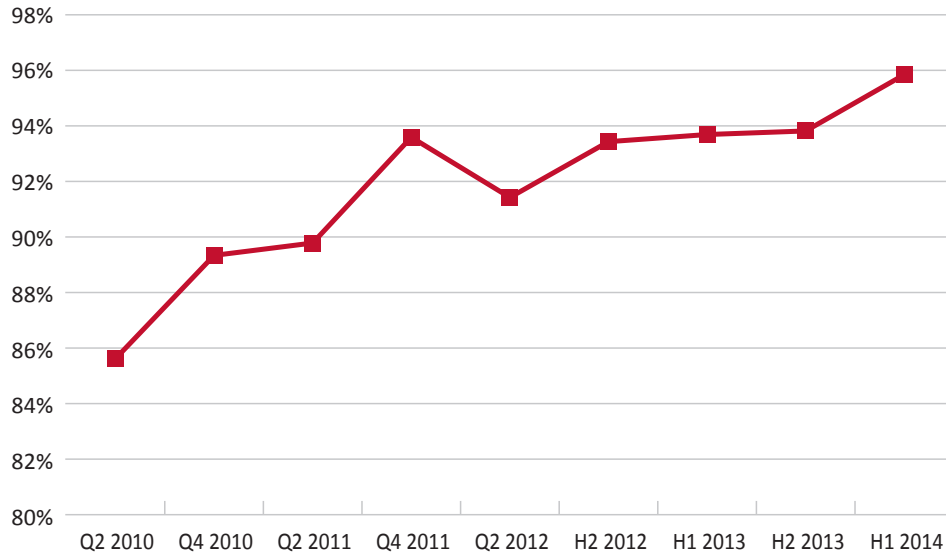
**Chart 6.5: Call failure**



Note: Chart 6.5 presents the average call failure rate for national calls (Q.I. F01, B03). The results for the POTS/ISDN (FORTHNET, HELLAS ON LINE, ON TELECOMS, WIND, OTE) (Q.I. F01) and for VoIP services (CYTA, HELLAS ON LINE, ON TELECOMS) (Q.I. B03). The POTS/ISDN services results for the 2<sup>nd</sup> semester of 2009 do not include FORTHNET and the same applies for ON TELECOMS for the 2<sup>nd</sup> semester of 2013 and henceforth. The VoIP services results up till the 2<sup>nd</sup> semester of 2013 do not include HELLAS ON LINE and the same applies for ON TELECOMS for the 2<sup>nd</sup> semester of 2014.

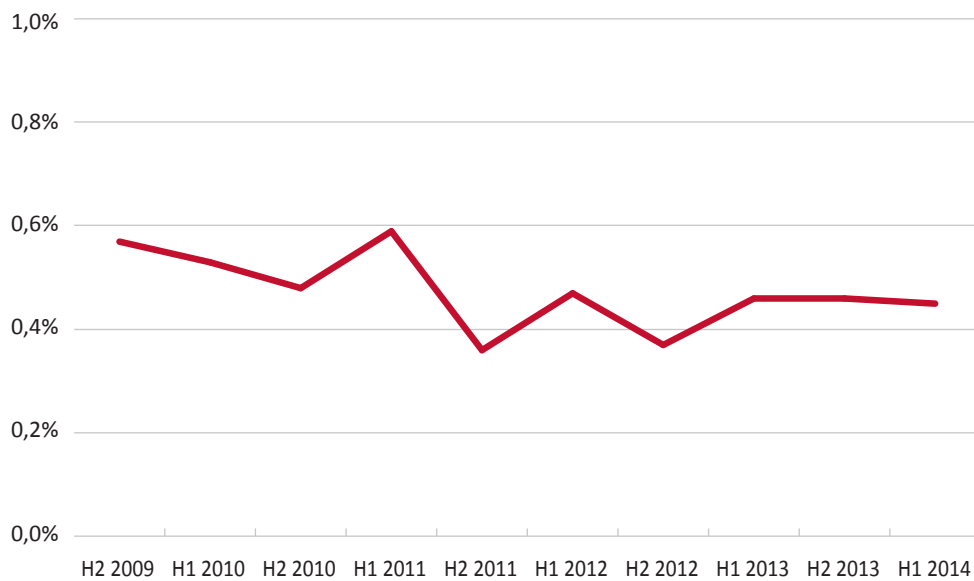


**Chart 6.6: Average consumer complaints' resolution percentage**



Note: Chart 6.6 illustrates the average resolution percentage of customer complaints (Q.I. H04). The graph presents the average results for companies COSMOTE, CYTA, FORTHNET, HELLAS ON LINE, ON TELECOMS, VODAFONE, WIND, OTE per quarter up till the 2<sup>nd</sup> semester 2012 and per semester henceforth. CYTA is not included in the 1<sup>st</sup> semester of 2009 and the same applies for ON TELECOMS for the 1<sup>st</sup> semester of 2014.

**Chart 6.7: Bill correctness complaints**



Note: Chart 6.7 presents the average percentage of complaints related to billing mistakes (Q.I. H05). The graph depicts the average results for the following companies: COSMOTE, CYTA, FORTHNET, HELLAS ON LINE, ON TELECOMS, VODAFONE, WIND και OTE. The results of the 1<sup>st</sup> semesters of 2011 and 2012 do not include HELLAS ON LINE. The results of the 1<sup>st</sup> semester of 2014 do not include ON TELECOMS.

have the ability to access regulated voice, SMS and data roaming services provided as a bundle by any alternative roaming provider (ARP). Furthermore, according to BEREC guidelines<sup>69</sup> on the separate sale of the regulated retail roaming services, the ARP is obliged to follow the authorisation procedure defined by the member state where the service is contracted. Taking into consideration the above and since:

- a user must receive mobile telephony services from a Greek mobile operator in order to be able to access international roaming services by an ARP,
- one of EETT's policy goals, when performing its duties regarding the provision of electronic communications networks or/and services, is the promotion of the users' interests within the EU,
- the provision of electronic communications services by an ARP relies on the use of the licensed (General Authorisation) Greek mobile operators' infrastructure,
- an ARP provides international roaming services by using NNP's numbering resources that have been secondary assigned to subscribers by the licensed Greek mobile operators,
- EETT, in case of infringements, should be able to take appropriate and proportionate measures to ensure compliance with the relevant provisions,

- an ARP may provide services without having been licensed by any member state thus not being under any regulation/audit in the EU and consequently may endanger consumers' interests,

EETT amended the General Authorisation Regulation in regard to the regulated voice, SMS and data roaming services provided to consumers as a bundle by any ARP. Consequently, any operator, who wishes to operate as an ARP, is obliged to have a General Authorisation.

#### **6.1.19. Drafting a Regulation for laying down the terms/conditions for the provision of access and interconnection services including the API & the EPG**

Following the relevant public consultation, EETT decided<sup>70</sup> to approve the terms and conditions that govern the provision of access and interconnection services, including the Application Programming Interface (API) and the Electronic Program Guides (EPG) thus consolidating the two current Regulations<sup>71</sup>. The above decision was notified to the European Commission, BEREC and the NRAs of the EU member states.

#### **6.1.20. Recommendation to the Ministry of Infrastructure, Transport and Networks for taking measures in regard to networks' integrity in case of emergency**

On 04-09-2014, EETT submitted its recommendation to the Ministry of Infrastructure, Transport and Networks for issuing a Joint Ministerial Decision (JMD), which will lay out the minimum requirements that should be met by any enterprise that provides telephone services to the public via the public communication networks. These requirements aim at ensuring on the one hand the maximum possible network availability in case of emergency or *force majeure* and on the other hand the uninterrupted access to emergency services pursuant to article 67 par.3 of L.4070/2012. The content of the recommendation was drafted by taking into consideration the proceedings of the relevant public consultation where many operators of the greek electronic communications market and other stakeholders submitted their remarks.

The following obligations are indicatively mentioned:

- ensure the uninterrupted access to emergency services,
- prioritize calls,
- draw up a disaster recovery plan and
- strengthen network resilience by taking measures in relation to equipment redundancy and power supply.

Furthermore, the recommendation draft encompasses issues for the prompt and effective updating of

69. BEREC BoR (13) 82 «BEREC Guidelines on roaming Regulation (EC) NO 531/2012 (Third Roaming Regulation) (Articles 4 and 5 on separate sale of roaming services)».

70. EETT decision no. 732/4/11-09-2014 (GG 2940/B/31-10-2014).

71. Pursuant to articles 46, par.3, 47, par.1-3, 48, par.1-3 and 49, par.3 of L.4070/2012 (GG 82/A/10-04-2012) that replaced EETT decisions no. 506/37/13-01-2009 (GG 369/B/03-03-2009) and 548/19/15-01-2010 (GG 161/B/19-02-2010).



**Table 6.2: Assigned [.gr] domain names (2008-2014)**

	2008	2009	2010	2011	2012	2013	2014
.gr	239,623	283,643	318,852	351,307	372,757	397,360	412,205
.com.gr	10,142	12,029	13,169	14,041	15,030	15,933	16,590
.net.gr	841	895	852	855	1,014	1,165	1,198
.org.gr	533	599	590	638	733	797	837
.edu.gr	746	902	1,016	1,131	1,266	1,392	1,561
.gov.gr	473	605	651	673	689	684	421
	<b>252,358</b>	<b>298,673</b>	<b>335,130</b>	<b>368,645</b>	<b>391,489</b>	<b>417,331</b>	<b>432,812</b>

Source: EETT

**Table 6.3: Number of assigned [.gr] domain names vs applications (2014)**

Month	Applications	Assignments	Rejections
January	66,742	7,247	59,495
February	43,712	7,249	36,463
March	19,165	7,537	11,628
April	8,342	6,973	1,369
May	7,498	7,379	119
June	7,470	7,417	53
July	6,538	6,497	41
August	4,173	4,150	23
September	6,777	6,750	27
October	7,390	7,327	63
November	6,790	6,690	100
December	7,124	5,835	1,289
<b>Total</b>	<b>191,721</b>	<b>81,051</b>	<b>110,670</b>

Source: EETT

consumers regarding the events that threaten or influence the networks' operation and the provision of services. EETT will monitor the operators' compliance with the minimum requirements that are included in this recommendation.

## 6.2. EETT's monitoring and supervisory actions in electronic communications

### 6.2.1. Inspections of electronic communications operators

#### Inspections of the implementation of the number portability Regulation

In the last quarter of 2014, EETT's monitoring teams carried out 20 on-site inspections of the facilities of fixed and mobile telephony operators in order to examine the

process to submit a number application as well as the rejections of portability applications by the subscribers' current operators. More particularly, it was checked whether the process followed when submitting a portability application is consistent with the number portability Regulation and whether the rejection reasons of randomly selected portability ap-



plications are valid. The rejection reasons are specific and restrictively defined in the Regulation (for example, the TIN of the subscriber that applies for a number portability is different from the TIN of the number's owner). EETT will evaluate the findings of those inspections and the companies that have infringed the Regulation will be summoned to a hearing.

It should be mentioned that the 2014 series of inspections follows the respective ones of 2013 that were carried out by EETT and resulted in the lowest rejection rate of portability applications in 2014 compared to the previous years.

### **Inspections of the implementation of General Authorisation Regulation and the Code of Practice**

In 2014, EETT carried out 188 inspections of the electronic communications operators regarding their compliance with their obligations towards consumers that stem from the General Authorisation Regulation and the Code of Practice for all electronic communications related services. The on-site inspections, that took place at the retail shops of the fixed and mobile operators in Attika and in the rest of the country, aimed at ascertaining whether or not:

a) the operators' staff, that directly promotes, sells services and serves consumers, also provides accurate, precise and fully up-to-date information on:

- the terms of the contract, prior to its signing, regarding its duration and termination as well as the consumers' rights,

- issues such as the quality indicators, fault reporting, the charges for services and the procedure for submitting and investigating a complaint.

b) the general contractual terms and especially the billing-related ones (fees for connection, disconnection and reconnection, monthly rentals, early termination fees etc.) comply with the provisions of the General Authorisation Regulation.

Following those inspections and in cases of infringements of the General Authorisation Regulation and the Code of Practice, EETT sent compliance letters to the operators inducing them to send instructions to their retail shops for all consumer-related information. EETT will continue to inspect operators' compliance with the current legislation on these issues.

### **Inspections of Multimedia Information Services (MIS)**

The increasing use of smartphones, tablets etc. that allow for the wired or wireless provision of broadband services warrants the intensification of EETT's interventions for the smooth operation of the PRS market and the protection of consumers. Specifically, EETT inspected the operators' compliance with the provisions of the relevant Code of Practice and summoned the inspected companies to hearings.

Furthermore and following consumers' complaints, EETT carried out inspections and ascertained that a bulk of unsolicited short calls are made from Bulgarian numbers that tend to induce the un-

suspected called party in Greece to dial back thus being heavily charged. The inspection (content of the telephone call between the competent Authority's division and the owners of those specific international numbers) ascertained that the whole process akin to a mechanism orchestrated by the owners of those specific international numbers in order to unlawfully reap financial benefits. Consequently, the domestic operators as well as the competent Communications Regulation Commission (CRC) were informed in order to investigate this issue and take the appropriate measures in Bulgaria.

### **On-site inspections of local exchanges and infrastructures of OTE, entitled operators and subscribers**

In the framework of its supervisory and monitoring role, EETT carried out repeated ex officio inspections in order to examine the procedures pertaining to the delivery of local loops and the handling of their faults. More particularly and in collaboration with the entitled operators, CYTA, FORTHNET, HELLAS ON LINE and WIND, 29 inspections of fault handling and local loop delivery took place in Attika and Salonica during 2014 as well as one inspection of fault handling following a consumer's complaint.

EETT's inspection teams visited, besides OTE's local exchanges, its respective subscriber's network termination points as well. Measurements were taken at the subscriber's end, as well as at OTE's local exchange, in the physical collocation area of the operators.



These inspections, that are carried out by EETT, examine the process of delivering/receiving loops, fault handling etc. by the sector's operators and aim at strengthening the smooth, high-quality and competitive market operation to the consumer's benefit.

### 6.2.2. Hearings on electronic communications issues

#### Local loop unbundling (LLU)

Regarding LLU issues, EETT held the following hearing in order to legally investigate:

- CYTA's complaint<sup>72</sup> versus OTE for resolving the dispute regarding the non-reimbursement of a clause due to the rejection of requests after the loop had been positively eligible. Finally, the dispute between the two parties was resolved and there wasn't any penalty levied (20-02-2014) and
- CYTA's<sup>73</sup> and FORTHNET's<sup>74</sup> complaints versus OTE for rejecting their local loop's requests due to the unavailability of access network. The decisions on those complaints are expected in 2015.

#### Number portability

In May 2014, EETT held the hearings of mobile operators COSMOTE, VODAFONE and WIND in order to investigate any infringements of the current legislation during the rejections of portability applications in the years 2011, 2012 and 2013. More par-

ticularly, the investigation pertained to the operators' compliance with the provisions of the Regulation on number portability, which restrictively define the reasons for rejecting a portability application. The investigation was based on the findings of the on-site inspections at the operators' facilities during 2012 and 2013, the processing of data submitted by the operators following EETT's requests and the examination of complaints submitted to EETT from customers complaining about the unjustifiable rejection of their portability requests. Those hearings were held in the aftermath of the respective ones in April 2013, since the term of the members of EETT's Plenary, that participated in those hearings, came to an end in the beginning of September 2013.

*On 13-03-2015, EETT imposed fines totalling 5,486,000 euros on the three mobile operator, after investigating complaints and performing ex officio inspections regarding the arbitrary rejections of consumers' portability requests in the period from 2011 to 2013.*

### 6.2.3. Hearings on electronic communications issues (overview)

In 2014, EETT conducted a total of 57 hearings regarding infringements of electronic communications or competition law in relation to market operation. As a result of these hearings, one fine was imposed whilst the decisions

for the rest of the hearings are expected in 2015.

### 6.3. Goals for 2015

As regards the electronic communications sector EETT has set the following objectives for 2015:

(a) Contributing to the development of Next Generation Access Networks

- Shaping up a regulatory framework based both on the analysis of wholesale local access at a fixed location (LLU, EMA) and wholesale provision of central access (ARYS) as well as on the update of OTE's reference offers for rolling out NGA as a means to provide ultra high speed broadband access to the metropolitan areas and bridge the regional digital divide.
- Monitoring the implementation of IP interconnection that was imposed in the context of the analysis of interconnection markets and aims at promoting Next Generation Networks (NGN).
- Promoting innovative techniques of wired and wireless access for NGN as well as utilising the scarce national resources in connection to the National Broadband Plan, thus reaching the country's goals of 2020 Digital Agenda as well as promoting IP technologies that will ensure quality services for the citizens.
- Reassessment of the procedures governing the granting of the

72. Ref. No. EETT 38329/16-09-2013.

73. Following EETT decision no. 706/39/06-02-2014, under Ref. No. EETT 7014/Φ391/19-02-2014 hearing process.

74. Following EETT decision no. 706/38/06-02-2014, under Ref. No. EETT 7019/Φ391/19-02-2014 hearing process.

- rights of use in cooperation with the appropriate stakeholders in order to improve them and facilitate the NGA roll-out.
- Supporting the NGA funded projects (e.g., rural networks) by providing the necessary expertise and establishing the proper operational procedures.
- (b) Safeguarding and reboosting the growth of the regulated markets
- Concluding major competition cases thus safeguarding/preserving the regulatory stability and transparency as necessary requirements for strengthening the competition in the regulated markets.
  - Taking regulatory initiatives, actions and measures for the competitive development of advanced electronic communications infrastructure and the provision of innovative services to the citizens.
  - Strengthening EETT's supervisory role.
- (c) Protecting consumers and enhancing their role and choices
- Transparency, information and protection of consumers from unfair practices.
  - The implementation of the new Regulation on number portability will provide more opportunities for the economic, fast and smooth transition between providers and services, in a way that consumers' choices will be rendered as a means to promote market competition.
  - Safeguarding the provision of the US in the telecommunications market by concluding both the audits for the net US cost and the new tender for the designation of a USP thus providing quality services effectively and reliably in the Greek territory.
  - Ensuring equal access to advanced telecommunications services for all citizens and especially for the vulnerable groups and persons with disabilities.
  - Launching applications for quality control (HYPERION application for fixed and mobile networks) as well as for combined evaluation of services (retail price Observatory for telecommunications & postal services) so that consumers can choose those products that really meet their needs.
- (d) Improving EETT's services and internal operations to better serve the needs of providers, consumers and citizens
- Internal operation that responds to the growing challenges with greater efficiency and low operating cost via automated procedures.
  - Speeding-up the licensing procedures for the development of wired and wireless networks that can provide quality services in the territory.
  - Increasing the security and trust in electroning transactions by implementing electronic signatures.
  - Outreaching and promoting EETT's image in the national and international level as a model of public service for the benefit of the citizen, the market and the state.

**Table 6.4: Results of EETT hearings in the electronic communications market (2014)**

Subject	Number of hearings	Fine	Recommendation	Other sanctions/ Decisions
Numbering/MIS	1	1		
Local loop unbundling (LLU)	1			1
Interconnection	3			3
Domain names	51			51
Competition	1		1	
<b>Total</b>	<b>57</b>	<b>1</b>	<b>1</b>	<b>55</b>

Source: EETT

# 7

## 7.1. Spectrum Management and Monitoring

### 7.1.1. Operational Program “Digital Convergence” (NSRF 2007-2013): System for measuring and presenting the electronic communications quality indicators

The project includes two sub-projects, the «Interactive display system for measurements for electronic communications quality indicators” and the “Study of international practices in measuring quality indicators for existing and new technologies and adapting them to the greek telecommunications market and regulatory framework».

During 2014, the open international tender for sub-project 1 was completed.

Specifically, in July 2014, sub-project 1 was awarded to companies “VECTOR TECHNOLOGIES IMPORTATION AND MARKETING OF ELECTRONIC SYSTEMS LTD” and «ARTEMIS INTEGRATED TECHNICAL SERVICES SA» at a total cost of 675,000 euros (excluding VAT). Furthermore, options of 300,000 euros (excluding VAT) were agreed. The options may be used by EETT, if desired, for system maintenance services, after the good operation warranty period, productive operation support services and complementary equipment.

The contract, after being approved by the Special Management Service of the Operational Program “Digital Convergence”, was signed on 26-11-2014. Sub-project 1 duration is eleven (11) months and

is co-financed by Operational Program “Digital Convergence” of the NSRF, the European Regional Development Fund (EU participation) and national funding (national participation). Sub-project 1 is expected to be completed at the end of the third quarter of 2015, while sub-project 2 was completed on 31-07-2014 by direct labor (i.e., entirely by EETT).

*Sub-project 1: Interactive display system for measurements for electronic communications quality indicators*

The purpose was to develop a web platform that will enable (fixed and mobile) telecommunications system users or operators to obtain in valid and objective manner comparable information on (fixed and



# RADIOFREQUENCY SPECTRUM

In 2014, EETT improved further the Electronic System for the Antenna Construction Application Submission (SILYA), developed the System for measuring and presenting electronic communications indicators, reviewed the regulatory framework and granted or amended a large number of radiofrequency rights to use for fixed, mobile and satellite service.

mobile) network quality in Greece as well as the quality of telecommunication services delivered.

Information will come from different sources depending on the technology of the telecommunications network and will be presented in an interactive way through the Geographic Information System (GIS). The results of the measurements will be renewed either in real time (online) or on a periodic basis (offline). The quality indicators provided through the project have been chosen after public consultation and are included in EETT's Regulation on the subject.

It is noted that quality indicators are classified into three main categories: (a) indicators for the

quality of fixed communications system services, (b) indicators for the quality of mobile communications system services and (c) indicators for the quality of consumer service and directory enquiries.

The presentation of quality indicators is expected to contribute in:

- providing the end user with the possibility to choose the operator with the best quality characteristics for the services he/she wishes to use in his/her geographical area,
- protecting the end-user by offering him/her the chance to check the provider's services,
- strengthening competition between electronic communications operators in order to improve the quality of services

delivered, the availability and the geographic coverage of their networks and

- increasing the available information and strengthening EETT's monitoring role.

The information system will support the storage and presentation of results through two mechanisms:

- measurements carried out by EETT on mobile communications systems with the tools acquired in the framework of the project,
- measurements by fixed communications services system operators on consumer services and directory enquiries, in accordance with the methodology indicated by EETT in the Regulation on quality indicators.



The system will be developed to present results in a user friendly manner and to perform information inquiries on various quality indicator categories, geographical regions and time periods.

*Sub-project 2: Study of international practices in measuring quality indicators for existing and new technologies and adapting them to the greek telecommunications market and regulatory framework*

Sub-project 2 was initiated in October 2013 and was successfully completed within 2014<sup>75</sup>. Objectives of the project are: (a) exploring modern methodologies to provide information concerning the quality of electronic communications services offered by providers, (b) recording and studying of today's international practices and standards/recommendations for measuring quality indicators in order to, together with the experience gained from the up to now implementation of the existing EETT Regulation for quality indicators<sup>76</sup>, submit proposals for its improvement, ensuring that:

- it is in line with international practices, technological developments, improvements in methods of measurement, new services provision, etc.,
- it responds in a better way to the end-users' need for access

to comparable, reliable and user-friendly information.

Publication of quality information becomes essential due to the evolution of electronic communications services provision networks and to the increasing penetration of broadband services. Measuring quality parameters of electronic communications networks and services are subject of study by various entities, such as international organizations (e.g., ETSI, ITU, etc.), European telecoms Regulators, telecommunications services providers, universities and research institutions.

Sub-project 2 included the following stages:

- preparation and distribution of questionnaires,
- collection and analysis of information received from questionnaires,
- investigation of international organizations standards/recommendations for quality indicators measurements
- overview of research practices for quality indicators measurements,
- editing the final deliverable which included the main conclusions as well as proposals for improvement of the existing EETT regulatory framework.

### 7.1.2. Review of Regulation on the terms of use of single radiofrequencies or radiofrequency bands

This Regulation sets the technical and operational terms for the spectrum usage<sup>77</sup>, defining, at the same time, the applications that require granting of radiofrequency right of use as well as the relevant preconditions. The major amendments, introduced by the revised edition of the Regulation for the use of the radiofrequency spectrum, are summarized as follows:

- making available of additional spectrum for terrestrial systems capable of providing electronic communications services in the 800MHz band<sup>78</sup>,
- adding arrangements for terrestrial and satellite digital broadcasting service,
- arrangements regarding fixed service (availability of new bands 32GHz and 42GHz, terms of use of adaptive modulation systems, modification of channeling plans),
- arrangements regarding the fixed satellite service (adding new types of terminals, limits for aircraft protection),
- integration of amendments and additions for short-range devices<sup>79</sup>.

75. Implementation of the project started on 01-10-2013 and ended on 31-07-2014 (implementation period from 01-10-2013 up to 29-11-2013 and from 03-02-2014 up to 31-07-2014).

76. EETT Regulation for quality indicators was issued in 2008 (EETT decision no. 480/017/13-05-2008, GG 1153/B/24-06-2008) and updated in 2011 (EETT decision no. 621/011/27-09-2011, GG 2417/B/01-11-2011).

77. EETT decision no. 721/2/12-06-2014 "Regulation on the terms of use of single radiofrequencies or radiofrequency bands" (GG 1713/B/26-06-2014).

78. European Commission decision 2010/267/EU of 6 May 2010 on harmonized technical conditions of use in the 790-862MHz frequency band for terrestrial systems capable of providing electronic communications services in the European Union.

79. European Commission implementing decision 2013/752/EU of 11 December 2013 amending decision 2006/771/EC on harmonization of the radio spectrum for use by short-range devices and repealing decision 2005/928/EC.

### 7.1.3. Fixed Service

Fixed service includes wireless electronic communications networks between specified fixed locations which: (a) provide electronic communications services to the public and (b) cover own telecommunication needs.

Radio links of fixed service are widely used, on the one hand by mobile communications networks operators to support their infrastructure and on the other hand by fixed telephony and Internet and data service providers for the wireless interconnection of their networks, mainly in areas where it is not easy to create a wired network (copper or fiber optics). Moreover, they are used by radio and television stations for program transfer from the point of program production (studio) to the broadcasting site.

In the majority of cases, granting of radiofrequency rights of use is required before operating these networks. During 2014, the following were granted:

- 983 new radiofrequency rights of use for two-way point-to-point links concerning mainly backbone networks of electronic communications service providers,
- 185 amendments of radiofrequency rights of use for two-way point-to-point links concerning backbone networks of electronic communications service providers and
- 44 radiofrequency rights of use for covering own electronic communications needs, mainly for the transfer of radio or tele-

vision program from the point of production (studio) to the broadcasting site.

With regard to legality checks and interference problems in fixed service systems, EETT received a total of 30 complaints:

- 15 for legality checks and interference problems in wireless access systems (WiFi and WiMAX),
- eight for legality checks into radio-links,
- five for interference inspections in licensed radio links and
- one for legality check into a radio link antenna and another one for legality check into a WiFi antenna.

Additionally, following ex officio inspections conducted by the Regional Offices (ROs) of EETT (in Thessaloniki, Patras and Heraklion) in the areas within their jurisdiction, 57 unlicensed radio link transmissions concerning radio and television signal transfer were recorded in frequency bands that have been allocated to GSM/DCS/UMTS mobile telephony services as well as to the development of defense systems and aeronautical radio navigation. After the inspections, recommendations were made to the involved stations, in order to terminate the operation of the radio links and to apply for rights to use radiofrequencies.

In 2014, Patras RO held five campaigns for measurements of radio stations' fixed links and two campaigns for measurements for television stations' fixed links. As a result, 24 extrajudicial were sent for illegal use of radiofrequencies.

In order to optimize the control of equipment and the spectrum use for radio stations' fixed links, Patras RO sent 166 letters to all legally operating radio stations in the area within its jurisdiction, requesting them to register the technical characteristics of the used equipment (transmitters, antennas etc.), the operating frequencies and the geographical locations of transmitters and receivers.

### 7.1.4. Satellite services

The installation and operation of satellite earth stations requires national and international coordination with existing fixed and satellite service networks in order to avoid interference. In this framework, in 2014 EETT applied the procedures set by the International Telecommunication Union (ITU) and harmonized domestic and foreign satellite earth stations with existing wireless networks. In addition, during the year:

- two new radiofrequency rights of use were granted to satellite earth stations,
- two existing radiofrequency rights of use for satellite earth stations were amended,
- three existing radiofrequency rights of use for satellite news gathering (SNG) earth stations were renewed and
- six temporary radiofrequency rights of use were granted to a big satellite network operator for data transfer.

Also, EETT sent two requests for international coordination with Turkey and Albania to the Mini-



stries of Finance, Infrastructure, Transport and Networks, Shipping and Aegean and Tourism, which were successfully processed.

Regarding the spectrum used for satellite services, in 2014, EETT took the appropriate actions to check and resolve two interference problems to receivers of GPS (Ground Positioning System) satellite radio navigation systems and one complaint about interference to satellite data reception by a satellite earth station. These interference problems were attributed to unlicensed terrestrial fixed service radio links. Also, EETT received two complaints for which no action was required, one for interference to the reception of satellite television programs in the 10.7-11.7GHz band and another for an unlicensed antenna construction, used only for reception.

### 7.1.5. Mobile services

#### Mobile telephony networks

Mobile telephony networks contain wireless digital systems for voice and data transfer, which use cellular technology and whose operation requires the granting of radiofrequency rights of use by EETT.

In 2014, EETT received 145 complaints related to interference in receiving frequencies of base stations communicating with mobile telephones, out of which 71 concerned the prefectures where EETT main and regional offices are located and 74 the rest of prefectures.

EETT investigated these complaints by performing checks and measurements with its fixed and mobile monitoring stations. The order of

priority was based on their importance to the smooth operation of the mobile telephony networks. All problems were checked and resolved and only in few cases, more checks and further actions are required. The interference problems were mainly due to:

- fixed telephony wireless DECT 6.0 (Digital Enhanced Cordless Telecommunications) devices,
- systems preventing the use of mobile telephones (jammers),
- spurious emissions from television signal amplifier systems,
- mobile telephony repeaters,
- radio link systems for sound, image and/or data transmission,
- spurious emissions from radio and television broadcasting stations,
- spurious emissions from mobile telephony base stations.

It should be noted that DECT 6.0 technology is used outside of the EU and requires the use of 1.92-1.93GHz frequency band, which the EU uses for mobile telephony services. The harmonized band for DECT wireless telephony in Europe is exclusively the 1.88-1.90GHz band. Moreover, the above devices do not have the “CE” mark and therefore according to the Presidential Decree (PD) 44/2002 they cannot be sold and/or operated in the European market. All the illegal devices had been bought outside of the EU, whilst from market controls no DECT 6.0 devices were found to be sold in the domestic market.

#### Measuring and presenting the electronic communications quality indicators

In 2014, EETT completed the tender process for the contractor that will carry out the quality indicator measurements for mobile communication networks for year 2015. Recognizing the efforts of the providers to upgrade data and voice services of their networks, EETT decided to modify the tender document that was based on 2012 regulatory framework and therefore integrated technical specifications that enable measurements of 4G (LTE) networks. Measurements are estimated to begin in 2015.

#### Private mobile radio networks

Private mobile radio (PMR) networks are used to cover various professional user groups’ communication needs, such as radio-taxi companies, security service providers, search and rescue volunteer groups, as well as forest protection volunteer groups etc. EETT grants radiofrequency rights of use, mostly in VHF and UHF bands. These rights concern broad or limited area networks for which EETT receives the corresponding spectrum fee. According to the new L.4070/2012, the installation and operation of private mobile radio networks is subject to a General Authorisation, but no longer requires registration at EETT’s registry of electronic communications networks and service providers.

In 2014, EETT issued 121 decisions, out of which 91 concerned new rights or amendment of exi-



sting rights, 26 revoked existing rights upon the request of their holders and four granted temporary rights for covering events.

Furthermore, during 2014, EETT received 21 complaints for interferences related to private mobile radio networks. EETT investigated them and concluded that the majority of the problems were caused by the use of non authorized fixed and mobile service frequencies as well as spurious emissions. In addition, 14 complaints were submitted concerning interference in remote control systems and electronic devices at home as well as the legality of radio network antenna systems. Also, EETT received four requests to check PMR equipment.

In all the above cases, EETT performed technical inspections and took all necessary actions to resolve the problems.

### **7.1.6. Ancillary services to broadcasting and program making**

An important category of services are ancillary services to broadcasting and program making. Examples of such services are radio–television program transfer from the production point (studio) to the broadcasting network and the coverage of sports events, outdoor performances or other special events. Radio equipment, such as wireless cameras and microphones and portable microwave links, are required for the coverage of these events. EETT grants permanent radiofrequency rights of use to meet the needs of radio or television stations (radio links) or temporary radiofrequency rights of use to cover scheduled

events with a maximum duration of two months.

In 2014, pursuant to relevant requests, temporary radiofrequency rights of use were granted to four news gathering satellite earth stations. These are mainly portable satellite stations used by foreign companies for image and sound transmission in order to have TV coverage of special events (for example VIP visitors) and sports events (for example Champions League 2014 qualifiers).

### **7.1.7. Radio-Television Complaints investigation**

As regards radio-television monitoring, in 2014, EETT received 1,058 cases and complaints related to provision of data, legality check, compliance with broadcast technical specifications, interferences, illegal broadcasts and illegal radio-television station and antenna installations.

From these complaints, 176 concerned Attica, 17 concerned all Greece, 311 the broader area of the Athens office jurisdiction, 421 the RO of Thessaloniki, 13 the RO of Patras and 120 the RO of Heraklion.

From these complaints and EETT's ex officio inspections and recordings, 765 new cases have emerged. Specifically:

- 465 concerned radio station issues: 40 in the Attica prefecture, 99 in the Thessaloniki prefecture, 80 within the jurisdiction of the Athens office (outside Attica prefecture), 201 within the jurisdiction of the RO of Thessaloniki (outside Thessaloniki prefecture),

six within the jurisdiction of the RO of Patras and 30 within the jurisdiction of the RO of Heraklion. In addition, nine cases concerned interferences within Greece.

- 221 concerned TV station issues: 39 in the Attica prefecture, 22 in the Thessaloniki prefecture, 58 within the jurisdiction of the Athens office (outside Attica prefecture), 71 within the jurisdiction of the RO of Thessaloniki (outside Thessaloniki prefecture), six within the jurisdiction of the RO of Patras and 19 within the jurisdiction of the RO of Heraklion. In addition, six cases concerned interferences within Greece.
- 79 concerned inspections of antennas and broadcasting sites: 15 in the Attica prefecture, 19 within the jurisdiction of the Athens office (outside Attica prefecture), 28 within the jurisdiction of the RO of Thessaloniki, one within the jurisdiction of the RO of Patras and 16 within the jurisdiction of the RO of Heraklion.

EETT investigated the majority of the above complaints, sending teams of technicians on the spot with the necessary equipment, whilst the assistance of the local authorities was requested when deemed necessary. The results were evaluated on the basis of the decisions and the technical data provided by the National Council for Radio and Television (NCRTV), whilst stations in violation were called upon to comply.

Upon relevant letters of compliance being sent, the following cases were submitted to administrative control: six non-permitted



broadcasts from TV stations (out of which two concerned digital broadcasting), 35 non-permitted installations of analog/digital local repeaters in the jurisdiction of Athens and the RO of Heraklion and 29 non registered occupations of television channels (eight analog and 21 digital) in the jurisdiction of the RO of Thessaloniki.

Moreover, the following cases were also subject to administrative control by EETT:

- 58 (19 for radio stations and 39 for antennas) within the jurisdiction of Athens,
- 80 (65 for radio stations and 15 for antennas) within the jurisdiction of the RO of Thessaloniki and
- five for radio stations in the jurisdiction of the RO of Heraklion.

In one case of a radio station within the jurisdiction of Athens and 28 cases of radio stations within the jurisdiction of the RO of Thessaloniki -for which the NCRTV verified that they were operating illegally- EETT notified the competent public prosecutors and police authorities for the implementation of the relevant criminal procedures.

In cooperation with the competent public prosecutors and the police authorities, 39 operations were carried out to terminate illegal transmissions. During those operations broadcasting equipment was confiscated from:

- 12 radio broadcasts, one analog and two digital television broadcasts as well as one radio station link in the Attica prefecture,
- six radio broadcasts, one digital

television broadcast and one television station link in the jurisdiction of the Athens office,

- seven radio broadcasts and two analog television broadcasts in the jurisdiction of the RO of Thessaloniki and
- six radio broadcasts in the jurisdiction of the RO of Heraklion.

### **Recording of radio and television stations throughout the country**

Mapping the broadcasting sites throughout the country as well as the frequencies used by radio and television stations is a critical tool for the management and monitoring of the radio–television spectrum.

The main concern of radio-television spectrum monitoring in 2014 was the recording of digital signal reception capability in a large number of settlements across Greece, based on the coverage projected from the frequency map. Recordings followed chronologically the switchover of each region to digital television, based on the projections of the relevant JMD. At the same time, EETT took all the appropriate actions for the termination of analog broadcasts and the removal of inactive television broadcasting installations.

In 2014, EETT's technical teams conducted 78 operations outside Attica (out of which 14 in cooperation with the RO of Heraklion) and 64 outside Thessaloniki respectively in order to resolve cases and perform recordings in 24 prefectures and islands.

Technical teams of the RO of Patra

conducted measurements in eight prefectures for the monitoring of radio spectrum. From the recordings, six illegal radio stations were identified, out of which three were confiscated by police authorities, with the technical assistance of the RO of Patras members, and the remaining three terminated their broadcasting after letters being sent from the RO of Patras to the local police authorities. Overall, the letters of compliance for operating frequencies other than the projected or for non declared broadcasting sites were 45, while the acts of conducting hearings 30.

For the monitoring of television spectrum, teams of the RO of Patras held, within the year, measuring campaigns in five prefectures in the area of its jurisdiction. More specifically, the measurements concerned:

- the degree of population and geographical coverage of the digital switchover in zone 6 (prefectures of Ilia, Achaia and southern Aitolocarnania),
- identification of three illegal television broadcasts (two digital and one analog) regarding the channels and the content and
- draft drawing of Ainos Kefalonia broadcasting site.

As a result of the above campaigns, five letters of compliance were sent.

Also, a measuring campaign was conducted by the RO of Patras for recording of neighbouring countries radio broadcasts received in Greece. This campaign was performed from Othonus-Corfu as

well as across the borders of the prefectures of Thesprotia and Ioannina.

The results of these recordings were checked based on the NCRTV data, which is the competent authority for investigating the legal operation of the radio–television stations and with the Ministry of Infrastructure, Transport and Networks data, which is the competent authority for legality of radio stations secondary broadcasting sites. Based on recorded findings, the number of privately owned radio stations operating in each prefecture is on average three to four times higher than the number of broadcasts stipulated in the frequency map. This means an increased risk of interference to legal spectrum users as well as a corresponding deterioration in service quality.

In addition to the aforementioned checks, EETT continued updating the map of radio–television broadcast installations in broadcasting sites throughout Greece. The purpose of this update was for EETT and all competent bodies to have information regarding the state of play in the broadcasting sites both in Athens and Thessaloniki as well as in other major broadcasting sites. Thus, they will be able to deal with the problems caused by illegal broadcasts in a more direct and effective manner. In the same context, in border areas, EETT continued to record the broadcasts from neighbouring countries and notified the Ministry of Infrastructure, Transport and Networks regarding the find-

ings for actions to be undertaken at international level.

EETT continued its attempts to tackle once and for all the issue of illegal radio–television broadcasts in the illegal broadcasting sites on Mount Egaleo (location of Pirovolia), on Mount Pikilo and on Mount Hymettus, in cooperation with the involved public and private authorities.

### **7.1.8. State services networks**

The smooth operation of wireless networks related to the protection of human life as well as public and national safety is a top priority for EETT. This category includes the state networks of emergency services, of the transport safety services as well as of the armed forces.

Typical examples of such networks are:

- emergency services such as the Hellenic Police (ELAS), the Hellenic Fire Service and the National First Aid Service (EKAV) and
- transport safety services (air navigation, sea navigation and railways).

Among the state networks, the Civil Aviation Authority (CAA) faces most of the problems as the spectrum granted to the air navigation networks (108-137MHz) is contiguous with the radio broadcasting spectrum (87.5–108MHz). Most of the interferences appearing in air navigation networks are due to the lack of radio broadcasting technical specifications both with respect to the operating frequency and to other important broadcasting parameters, which in turn are due to the absence of radio stations licensing.

In 2014, interference problems were encountered in the following wireless systems of the CAA:

- area control service communication systems (telecommunication centers),
- airport communication systems and
- radio aids.

EETT carried out 28 operations to deal with written complaints regarding interferences in the wireless systems of CAA. Out of these complaints, 23 were related to terrestrial communication receivers, two to aircraft receivers, whereas three were related to radio aids. EETT acted promptly and resolved all the above cases of interference. In order to deal with interferences to aircraft receivers, EETT used the aircrafts of the Flight Inspection Unit of CAA.

It is noted that the interference problems of the CAA are expected to be limited only when country-wide licensing of radio stations is performed and regional planning rules and inspections of the antenna installations at the broadcasting sites are imposed accordingly.

In addition, EETT held electric field strength measurements in the VHF and UHF bands in the region of Ipsario Thassos, intended for CAA transceivers installation.

A technical team of the RO of Patras performed measurements in all the operating frequencies of the telecommunications centre of CAA on Acarnanica mountain, which is responsible for all communications of the west side of the Greek national airspace, in order to prevent inter-



ference. As a result, no interference problems were reported during the summer period where the number of passengers increases.

Moreover, in 2014 EETT received 16 interference cases in the operating frequencies of other state safety and emergency networks. They were examined with priority and were promptly resolved. Specifically, EETT received two complaints from the Hellenic National Defense General Staff, four complaints from the Coast Guard, one complaint from the Hellenic Police, two complaints from the National First Aid Service, one from the Civil Protection of Kefalonia and six from the Hellenic Fire Service. Also, EETT's assistance was requested in order to locate a stolen transceiver of National First Aid Service.

### 7.1.9. Radio amateurs

In 2014, EETT received 63 complaints of radio amateur interference in communication systems and 47 complaints concerning antenna systems legality inspections and possible interference caused by their operation. EETT carried out technical inspections for all these cases and promptly scheduled the actions required for resolving the problems. The

majority of the problems investigated were caused by spurious emissions from electromechanical, electrical or electronic devices as well as by unauthorized use of frequencies.

## 7.2. Antenna mast constructions

### 7.2.1. Electronic System for the Antenna Construction Application Submission (SILYA)

During 2014, EETT further expanded SILYA web application which was developed following L.4070/2012, implementing the one-stop shop for licensing the antenna constructions. SILYA is in operation since December 2012 and provides the operators with the ability to electronically submit applications for antenna constructions and the competent authorities with the ability to process them via web access.

The main SILYA expansions that were performed within 2014 concerned the ability to electronically submit and manage the following types of declarations:

- Declarations for Installation of Standardized Antenna Mast Constructions, in accordance with the relevant JMD<sup>80</sup> and the relevant EETT decision<sup>81</sup>. It is noted that the Standardized Antenna

Mast Constructions are installed after a special licensing process. Upon request, EETT issues a license for the antenna mast construction type which specifies the characteristics of the construction regardless its location. For installation in a specific location, submission of an Installation Declaration to EETT is required.

- Environmental Declarations, in accordance with the relevant JMD<sup>82</sup>. It is noted that according to the legislation in force, for the majority of antenna constructions, the environmental licensing is now accomplished with the submission of Environmental Declarations.
- Standardized Declarations for Antenna Constructions Amendment based on par.17 article 30 of L.4070/2012, as amended with par.14 article 60 of L.4313/2014. It is noted that with L.4313/2014 the process of licensed antenna constructions amendment regarding exploiting of new technologies and of additional frequency bands was simplified. In these cases, modification of the license is no longer required. Submission of the relevant declaration together with the assent of Greek Atomic Energy Commission (GAEC) is required.

80. Joint ministerial decision of the Minister of Environment, Energy and Climate Change and the Minister of Infrastructure, Transport and Networks no. 11926/261/08-03-2011 "Special Licensing procedure for installation of Standardized Antenna Mast Constructions" (GG 453/B/22-03-2011).

81. EETT decision no. 629/9/17-11-2011 "Regulation for determining the individual procedures and the required documentation in the licensing procedure of standardized antenna mast constructions, pursuant to the joint ministerial decision no. 11926/261 GG/453/B/22-03-2011" (GG 3037/B/30-12-2011).

82. Joint ministerial decision no. 174610/01-9-2014 "Standard Environmental Commitments for projects and activities of category B of group 12 «Special projects and activities», s/n 6 «Mobile and fixed wireless telephony base stations» of Annex XII of the ministerial decision no. 1958/2012 (B' 21)" as applied (GG 2498/B/19-09-2014).

The details of the electronic submission of the aforementioned types of declarations are specified in relevant EETT decisions<sup>83</sup>.

### 7.2.2. Licensing Process

Throughout 2014, 1,075 applications for new or amended antenna mast construction licenses were submitted to SILYA together with the relevant completed folders as projected in par.17 article 30 of L.4070/2012. In total, EETT by using its web application SILYA:

- granted 69 certificates of compliance based on article 30 of L.4070/2012,
- granted 1,004 licenses for antenna mast constructions, out of which 198 based on article 30 of L.4070/2012 and 806 based on article 31 of L.4053/2012,
- amended 498 licenses, out of which 300 based on article 30 of L.4070/2012 and 198 based on article 31 of L.4053/2012,
- rejected 184 applications for antenna construction licenses and
- revoked 145 antenna construction licenses.

Chart 7.1 illustrates the distribution of the relevant administrative acts issued within 2014 classified per type.

Some licensing requests -related mainly to antenna mast constructions falling under article 31 of

L.4053/2012, in other words having legal operation status- remain pending.

### 7.2.3. Illegal mobile telephony antenna mast installations

In 2014, 830 complaints were submitted to EETT relating to mobile telephony antenna mast constructions. Out of these, 639 concerned the area of jurisdiction of the Athens office and the RO of Heraklion, 182 the area of jurisdiction of the RO of Thessaloniki and nine the area of jurisdiction of the RO of Patras.

Following a thorough investigation, it was found that the 686 licensed and legally operating antennas, for the legality of which the complainants/applicants were informed, concerned 545 complaints within the area of jurisdiction of Athens and the RO of Heraklion, 137 within the area of jurisdiction of the RO of Thessaloniki and four within the area of jurisdiction of the RO of Patras. In addition, 144 unlicensed constructions concerned 94 complaints within the area of jurisdiction of Athens and the RO of Heraklion, 45 within the area of jurisdiction of the RO of Thessaloniki and five within the area jurisdiction of the RO of Patras. In the cases of unlicensed antenna mast constructions, for which onsite inspections were performed, EETT proceeded

to impose administrative sanctions.

EETT technical teams conducted in total 598 onsite inspections at mobile telephony base stations, out of which 374 (290 inside and 84 outside Attica) by the Spectrum Monitoring Department of EETT in Athens, 181 (91 inside and 90 outside Thessaloniki prefecture) by the RO of Thessaloniki, 17 by the RO of Patras and 26 by the RO of Heraklion.

### 7.2.4. Standardized antenna mast constructions

The antenna mast construction which fully complies with a specific License Type<sup>84</sup> is defined as standardized. A technical specification that describes precisely and clearly all the antenna construction features in order to be applied repeatedly is defined as type of antenna mast construction. The license for the antenna mast construction type is issued by EETT after the assent of the Ministry of Environment, Energy and Climate Change and the GAEC. The network provider that received license for a type of antenna mast construction can install standardized antenna mast constructions corresponding to the license type, following a relatively brief administrative procedure that does not require additional administrative acts.

83. EETT decision no. 723/2/26-06-2014 "Determination of the procedure for electronic submission of Standardized Antenna Mast Constructions" and 746/4/22-01-2015 "Expansion of the Electronic System for the Antenna Construction Application Submission (SILYA) for the electronic submission of Environmental Declarations and Standardized Declarations for Antenna Constructions Amendment".

84. Joint ministerial decision of the Minister of Environment, Energy and Climate Change and the Minister of Infrastructure, Transport and Networks no. 11926/261/08-03-2011 "Special Licensing procedure for installation of Standardized Antenna Mast Constructions" (GG 453/B/22-03-2011).



In 2014, EETT issued 17 license types for the three mobile electronic communication network providers of the greek market and published the licenses together with all relevant supporting documents on its website.

At the end of the year, there were no pending requests for licenses for antenna mast construction types.

### 7.3. Radio and Telecommunications Terminal Equipment (RTTE)

#### 7.3.1. Market surveillance

EETT conducts administrative and technical inspections in the Radio and Telecommunications Terminal Equipment (RTTE) market to protect citizens from illegal equipment and prevent potential harmful interference. In this context, EETT monitors the compliance of the RTTE that is available and used in the greek market, in accordance with the requirements set by PD 44/2002.

In 2014, EETT performed regular controls in stores selling RTTE, on various equipment categories (such as mobile telephony signal amplifying devices, mobile phones, short range devices, wireless games). More specifically:

- In total, 145 RTTE samples were checked administratively and/or technically.

- Random inspections were performed at 44 companies operating as distributors or responsible for selling RTTE in the Greek market (either directly in distribution stores or online). In these checks, 39 import companies responsible for selling RTTE in the Greek and/or European market were involved.

- Two inspections were conducted in order to investigate complaints.

Following the above checks, EETT found that:

- 116 RTTE samples did not comply with at least one of the administrative requirements of PD 44/2002 and EETT took all the actions set forth in law.
- For an RTTE sample, which was technically checked and for which it was proven that it worked outside the European safety standards, notification was sent to the competent authorities in accordance with the system RAPEX<sup>85</sup>.
- Technical measurements based on European standards were performed on five RTTE samples and the cases are still ongoing.

#### 7.3.2. Notified bodies

Notified body is the body designated as competent to perform the conformity assessment proce-

dures specified in article 12 of PD 44/2002 for RTTE products (such as for example to make the assessment of technical documentation, to carry out inspections and tests and to issue certificates of compliance). A company established in Greece can be designated as a notified body by an EETT decision, at his request, if it meets certain criteria<sup>86</sup>.

The company «LAMPOR SA» was designated, with an EETT decision<sup>87</sup>, as notified body in accordance with the PD 44/2002 having as application field Appendices III and IV of the above mentioned PD. The definition is valid until 20-08-2017 and the notified body identification number is 2537.

It is noted that on 17-12-2014, the designation of the company «EMC Hellas SA», as notified body, in accordance with PD 44/2002 having as application field Appendices III and IV and with identification number 1002, expired, as stated in an EETT decision<sup>88</sup>.

### 7.4. EETT's supervisory actions in the radiofrequency spectrum

In 2014, EETT held 624 hearings regarding radiofrequency spectrum issues and imposed 488 fines (Table 7.1).

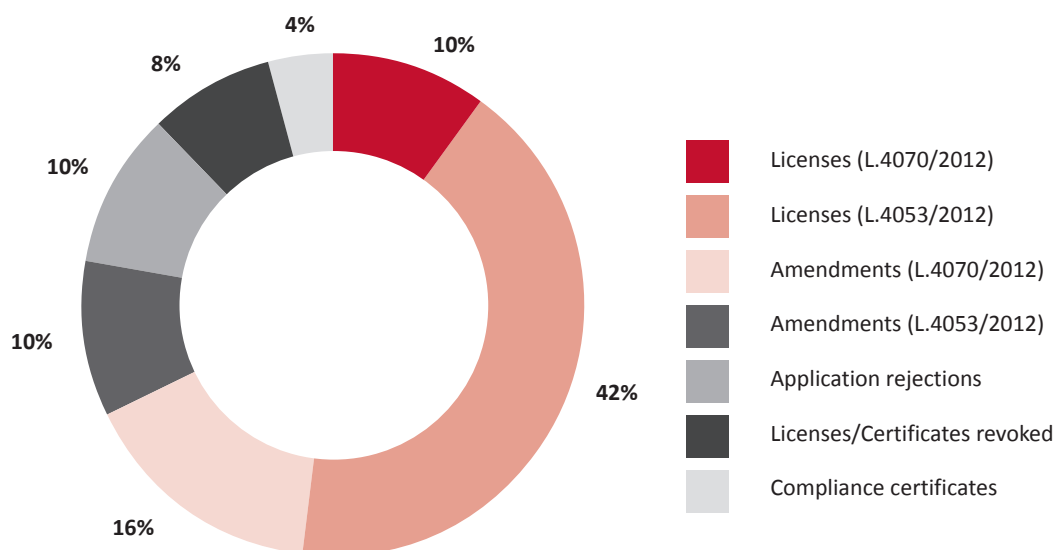
85. <http://ec.europa.eu/consumers/safety/rapex/>

86. EETT decision no. 279/32/21-03-2003 "Regulation for the designation of bodies as notified bodies in accordance with Presidential Decree" (GG 441/B/14-04-2003).

87. EETT decision no. 713/13/03-04-2014 "Designation of «LAMPOR SA» as notified body in accordance with the Presidential Decree 44/2002".

88. EETT decision 593/12/17-12-2011 "Extension of the designation of the company under the name "EMC Hellas SA Electromagnetic Compatibility" and under the title «EMC Hellas SA" as a notified body, in accordance with Presidential Decree 44/2002".

**Chart 7.1. Distribution of administrative acts for antenna mast constructions (2014)**



Source: EETT

## 7.5. Goals for 2015

Through its actions for the radio spectrum, EETT aims to make optimal use of this scarce resource, both in technical and economic terms. In this context, and during 2015, the authority has set the following goals:

- Completion of surveillance of digital broadcasting network implementation and of analog television broadcasts switch off which started in 2014. Also, EETT will continue to record the broadcasts of digital terrestrial television in order to verify the proper implementation of the network in accordance with the right of use granted to the service provider.
- Conducting, within the year, two tender processes in order to award spectrum for wireless communications:
  - for the 26GHz frequency band for implementation of broad-

band fixed wireless access networks, where the allocated rights expire in 2016 and

- for part of the 1800MHz frequency band for mobile broadband communications as the relevant rights of use belonging to mobile telephony providers also expire in 2016.
- SILYA further enhancement with new functions for providers and new arrangements that will accelerate wireless networks deployment. At the same time, EETT will make every possible effort to eliminate all antenna construction licensing pending applications. EETT will also publish on its website the registry of licensed antenna constructions, enabling every citizen and interested party to be informed on the legal antenna constructions.
- Spectrum monitoring equipment modernization in the Spectrum Monitoring Department of EETT in Athens and in all the regional of-

fices in order to be more efficient and effective in protecting authorized users of radiofrequencies.

- Intensification of EETT's joint effort with the CAA for more direct intervention in cases of harmful interference in air navigation frequencies, completing in that way the relevant memorandum of understanding for the installation of EETT equipment.
- Continue, in cooperation with the regulatory authorities of all member states, to conduct equipment market surveillance, thus protecting consumers from inappropriate devices put into market.
- Supply of spectrum management information system with integrated platform for electronic submission of requests in order to modernize the technical tools used by EETT to manage spectrum and in parallel to offer involved operators the ability to have easier and more direct access to information on their demands.



**Table 7.1. Results of EETT hearings in the radiofrequency spectrum sector (2014)**

Subject	Number of hearings	Fine	Recommendation	Dismissal	Other penalties / Decisions
Mobile telephony antenna mast constructions	420	420			
Other antenna mast constructions	21	12	9		
Radioequipment	49	11	32	4	2
Other (Spectrum)	1		1		
Monitoring of radio-television stations	133	45	85	3	
<b>Total</b>	<b>624</b>	<b>488</b>	<b>127</b>	<b>7</b>	<b>2</b>

Source: EETT

- Conducting a study and public consultation with the market for the optimal utilization of white areas in frequency spectrum between 470-790MHz in respect to the European policy on spectrum use.





# 8

## 8.1. Regulatory actions in the Greek postal market

### 8.1.1. Regulation on the access to the public postal network

EETT, following respective study and public consultation, issued Regulation<sup>89</sup> on the definition of terms and conditions for the access of postal service providers with Individual Licence to the postal network of the Universal Service Provider (USP).

According to the regulation:

- The postal service provider forwards the postal items to predefined points of USP network, which USP receives and delivers provided that the standardization and classification terms are fulfilled.

- The postal service provider forwards to USP post offices the postal items to be delivered to mailbox clusters. Accordingly, the delivery of the postal items may take place to outdoor mailbox clusters owned by USP.
- The correspondence of every person or entity that proceeds with a change in the address may be delivered to the new address, after the submission of a related declaration at USP premises.

It is also defined that:

- The postal service provider receives the returned items from specific points of USP network.
- The USP provides the postal ser-

vice providers with the undelivered data of postal codes at fair price.

- The USP revenue from the provision of access services to postal service providers is not subject to EETT fees.
- The USP and the postal service providers submit annually to EETT, data related to the access to USP network.

The Regulation reinforces the effective use of the existing infrastructure, provides further alternatives for the development of the companies activated in the Universal Service Area, whilst postal users receive qualitative services in lower prices.

89. GG 2589/B/29-09-2014 "Regulation on the access to the Universal Service Provider postal network by the postal service providers with Individual License".

# **POSTAL SERVICES**

In 2014, EETT issued two regulations concerning the access to the public postal network and the delivery of Universal Service (US). Furthermore, it announced a public tender for the selection of contractor for the approval of the new cost accounting system of ELTA, proceeded with US quality measurements and conducted onsite audits as well as hearings.

At the same time, EETT issued a decision regarding the establishment and the operation of a system for the monitoring of postal services' retail prices in the greek market, developed an application for the fee payment by the postal service providers, issued a study on the development of the postal market and conducted a study on e-commerce to be issued in 2015.

## **8.2. Universal Service quality assurance**

### **8.2.1. Regulation on Universal Service delivery**

EETT defined<sup>90</sup> the terms and conditions for the home delivery of postal parcels up to 20kg, in the framework of US provision.

According to the decision:

- “Small packets” category, which constitutes the majority of e-commerce items, is introduced and defined as postal items, the dimensions of which exceed letter dimensions and weigh less than 2kg. The small packets may

be handled as unique identity parcels or as single letter post.

- For recipients in a radius greater than 5km or at a driving distance greater than 10km from the post office or the reception door, home delivery of special handling letter post (registered/declared value) and parcels is set in place. The unique identity of special handling letter post and parcels enables the web or telephone search regarding collection and delivery data.
- In areas, where home delivery is not possible due to lack or absence of address numbers, the

collection of postal items from the post office/reception door/mailbox cluster in a radius not greater than 1km is established. For those areas, personal mailboxes installation in public roads is also enabled. Related provisions are set in place for home service of the elderly or people with special needs.

- In cases where home delivery is impossible, for reasons such as the unsafe access of postal distributor to specific addresses, alternatives to postal item delivery are defined, such as postal service to another address or specific post office or personal

90. GG 1441/B/04-06-2014, “Determining the distribution conditions of postal items, the possible exceptions and conditions of them as well as setting specific arrangements for home (or premises) delivery of postal parcels weighing up to twenty (20) kg under the provision of Universal Postal Service”.



mailbox in a public road. Moreover, the regulation makes provision for the development of automated or reception mailboxes by other providers for commercial purposes and additionally the utilization of the rapidly growing geocoding applications of buildings and residences through GIS.

- For the undelivered domestic items, the regulation makes provision for their free return to sender.

It is finally noted, that, in the framework of the aforesaid regulation and L.4053/2012<sup>91</sup>, the installation of outdoor mailbox clusters in Corfu district has been approved.

### 8.2.2. ELTA cost accounting audit

In 2014, EETT announced a public tender<sup>92</sup> for the selection of contractor for the provision of consulting services in specialised issues regarding the evaluation and approval of the new cost accounting system of ELTA. ELTA requested<sup>93</sup> the audit and approval of the new updated cost accounting system, which significantly affects the provision of US, especially due to the introduction of the geographically based costing and pricing. The project is expected to be completed within 2015.

### 8.2.3. Universal Service quality measurement results

In the framework of its supervisory and monitoring role and accord-

ing to ministerial decision<sup>94</sup> EETT publishes US quality measurement results, regarding domestic first priority mail and international first priority mail. Through these quality measurements, EETT aims at the safeguarding of an effective and viable US for the benefit of the consumer.

It is mentioned that following L.4053/2012<sup>95</sup>, US of specific quality should be provided to postal services users, irrespective of their geographic location within Greece, on a permanent basis and at affordable price. As already stated, ELTA will remain the USP until 31-12-2028.

The measurements include:

- the delivery percentages for domestic first priority mail within one (D+1) and three (D+3) days from the working day of deposit and the average delivery time, in number of days, of delivery from end to end.
- the delivery percentages of international first priority incoming/outgoing mail within three and five days from the working day of deposit and the average delivery time, in number of days, of delivery from end to end.

#### Domestic first priority mail

In 2014, as regards to domestic first priority mail, the measurement system was implemented in complete compliance with the

specifications of the European quality standard EN 13850:2012 by an internationally acclaimed third party.

Table 8.1 presents the delivery percentages achieved by the USP per semester. USP delivery obligation within one working day from the day of deposit (D+1) is 87% and within three working days (D+3) delivery obligation reaches 98%. The table also shows the average delivery time.

In 2014, there was a decrease in the percentages of mail delivery within one day by 3.5%, whereas mail delivery within three days remained almost stable. Average delivery time is increased by 5.9%.

#### International first priority mail

International first priority mail quality measurements are conducted for all EU countries by the International Post Corporation (IPC)<sup>96</sup>. In 2014, measurements were performed in 31 countries.

Tables 8.2 and 8.3 show:

- USP delivery obligation with respect to incoming and outgoing international first priority mail within three working days (D+3) and within five working days (D+5) from the date of deposit, according to L.4053/2012 and as an obligation for USP,
- the delivery percentages achieved by USP with respect to incoming

91. GG 44/07-03-2012 "Regulation of postal market operation, telecommunication issues and other provisions".

92. EETT decision 733/25/18-09-2014.

93. According to a letter (EETT Ref. Nu. 31828/08-08-2014).

94. GG 3423/B/19-12-2014 «Quality definition of the provided universal postal services in national and inter-EC level».

95. GG 44/A/07-03-2012, "Regulation and operation of the postal market, electronic communication issues and other provisions".

96. More information on the quality of incoming and outgoing mail for the EU countries can be found on IPC's official website <http://www.ipc.be>.

**Table 8.1: Domestic first priority mail**

Semester	ELTA obligation under ministerial decision (MD) 72142/1663/2014		ELTA results based on measurements					
	D+1	D+3	D+1		D+3		Average delivery time (in days)	
Semester A			86.5%		99.3%		1.10	
Semester B	87.0%	98.0%	88.8%	87.3%	99.9%	99.6%	1.04	1.08

**Table 8.2: USP international outgoing correspondence (2014)**

Country of destination (from Greece)*	Outgoing (D+3)		Outgoing (D+5)		Outgoing Average delivery time (in days)
	ELTA obligation under ministerial decision (MD) 72142/1663/2014 (%)	ELTA results (%)	ELTA obligation under ministerial decision (MD) 72142/1663/2014 (%)	ELTA results (%)	
Austria	85.0	79.3	97.0	99.1	2.6
Belgium	85.0	90.3	97.0	98.1	2.5
Bulgaria	85.0	69.6	97.0	92.1	3.2
France	85.0	92.9	97.0	97.9	2.2
Germany	85.0	88.6	97.0	97.7	2.4
Denmark	85.0	95.4	97.0	99.7	2.2
Switzerland	85.0	90.8	97.0	100.0	2.1
Estonia	85.0	38.1	97.0	78.3	4.2
UK	85.0	92.7	97.0	98.3	2.2
Ireland	85.0	66.1	97.0	93.1	3.6
Spain	85.0	57.3	97.0	85.8	3.7
Italy	85.0	81.0	97.0	92.0	3.0
Croatia	85.0	56.3	97.0	89.3	3.8
Cyprus	85.0	64.2	97.0	91.7	3.5
Latvia	85.0	34.2	97.0	75.6	4.5
Luxembourg	85.0	88.7	97.0	100.0	2.5
Malta	85.0	58.4	97.0	88.1	3.6
Norway	85.0	59.3	97.0	86.0	3.7
Netherlands	85.0	72.3	97.0	94.9	3.2
Hungary	85.0	77.5	97.0	98.1	2.6
Poland	85.0	87.9	97.0	96.6	2.6
Portugal	85.0	78.9	97.0	95.7	2.7
Romania	85.0	81.4	97.0	94.0	2.7
Sweden	85.0	79.5	97.0	97.7	2.6
Czech Republic	85.0	80.4	97.0	97.7	2.7
Finland	85.0	70.1	97.0	91.1	3.4

D= Day of deposit



**Table 8.3: USP international incoming correspondence (2014)**

Country of origin (to Greece)*	Incoming (D+3)		Incoming (D+5)		Incoming
	ELTA obligation under ministerial decision (MD) 72142/1663/2014 (%)	ELTA results (%)	ELTA obligation under ministerial decision (MD) 72142/1663/2014 (%)	ELTA results (%)	Average delivery time (in days)
Austria	85.0	70.1	97.0	94.0	3.1
Belgium	85.0	68.0	97.0	92.0	3.5
Bulgaria	85.0	9.9	97.0	33.6	6.9
France	85.0	65.6	97.0	92.2	3.4
Denmark	85.0	82.2	97.0	93.9	2.9
Switzerland	85.0	76.7	97.0	94.9	3.1
Estonia	85.0	24.0	97.0	63.8	5.3
UK	85.0	73.0	97.0	92.7	3.2
Ireland	85.0	55.5	97.0	86.2	3.8
Spain	85.0	61.5	97.0	89.7	3.7
Italy	85.0	61.4	97.0	90.5	3.6
Cyprus	85.0	32.2	97.0	75.5	4.8
Latvia	85.0	43.1	97.0	82.1	4.5
Luxembourg	85.0	59.5	97.0	89.1	3.8
Malta	85.0	20.9	97.0	76.7	4.8
Norway	85.0	68.9	97.0	93.8	3.2
Netherlands	85.0	58.7	97.0	90.3	3.6
Hungary	85.0	28.4	97.0	75.4	4.7
Poland	85.0	41.5	97.0	77.3	4.3
Portugal	85.0	56.1	97.0	85.9	3.9
Romania	85.0	33.5	97.0	75.1	4.6
Sweden	85.0	73.6	97.0	91.1	3.1
Czech Republic	85.0	21.9	97.0	69.8	5.1
Finland	85.0	57.4	97.0	88.7	3.7

D= Day of deposit

and outgoing international first priority mail within three working days (D+3) and within five working days (D+5) from the date of deposit and

- the average delivery time, in number of days, from end to end.

Regarding the international outgoing mail, measurements were conducted in 26 countries. According to the results:

- In eight out of 26 countries (30.8%) the speed indicator, i.e., delivery percentage within three

working days from the day of deposit, is equal or higher than the percentage of USP obligation for 2014, according to L.4053/2012,

- In nine out of 25 countries (36%) the speed indicator in 2014 is improved as compared to 2013,

- In 11 out of 26 countries (42.3%) the reliability indicator, i.e., the delivery percentage within five working days from the day of deposit is equal or higher than the percentage of USP obligation for 2014 according to L.4053/2012,
- In five out of 25 countries (20.0%) the reliability indicator is ameliorated in 2014 as compared to 2013,
- In eight out of 25 countries (32.0%) the average delivery time in 2014 is improved as compared to 2013.

As regards to international incoming mail, in 2014, measurements were conducted in 24 countries. According to the results:

- In none of the 24 countries the speed indicator is equal or higher than the corresponding percentage that USP (ELTA) has to achieve according to L.4053/2012,
- In seven out of 23 countries (30.4%) the speed indicator is improved as compared to 2013,
- In none of the 24 countries, the reliability indicator is equal or higher than the corresponding percentage that USP (ELTA) has to achieve according to L.4053/2012,
- In three out of 23 countries (13.0%) the reliability indicator is improved in 2014 as compared to 2013,
- In four out of 23 countries (17.4%) the average delivery time in 2014 is improved as compared to 2013.

The international mail quality measurements among the 31 countries end up with a speed indicator of 90.6% (higher than the target of 85%), a reliability indicator of 97.8% (higher than the target of 97%) and average delivery time from country to country 2.4 days.

### 8.3. Actions for the postal market

#### 8.3.1. Retail price system for postal services

EETT, following public consultation, decided<sup>97</sup> the development and operation of a retail price platform for postal services in the greek market. The platform constitutes the base for the development of the electronic Observatory for retail prices of postal services in the context of NSRF. The purpose is to enable the comparative evaluation of the offered courier services to users/consumers, based on specific criteria.

Specifically:

- EETT defines a standard file format of invoice data for the provision of retail prices and other data of postal services,
- the electronic Depository, which will be developed as a sub-project of the Observatory, will be updated by the postal service providers with primary retail data of postal services, according to the requirements of the standard file format,
- the regulated providers will upload the files to the electronic

Depository through a secure web tool

- the end user benefits from the electronic Observatory through the comparative evaluation based on the definition of specific parameters of the shipment and through the automated response with sorted lists, according to user's preferences.

The electronic Observatory will operate in a separate area at EETT's website. In order to enable the implicated providers and EETT to proceed with all the required actions, an adaptation period has been foreseen. Thereafter and for a trial period, access to all services of the electronic Depository and Observatory will be granted only to the implicated providers and EETT.

#### 8.3.2. EETT registry's web based application

In 2014, the process of the electronic registration of the postal service providers under General Authorisation in EETT registry was completed. In that framework, all postal service providers received passwords, which enabled their full access to the web based application.

Next, EETT issued a decision in order to activate the web based application for the electronic submission of fee payment along with the attachment of related documents, as these are defined in Appendix 2 of the General Authorisation Regulation.

97. EETT decision 743/14/18-12-2014 "Decision on the installation and operation of the retail price System for postal services in the greek market".



### 8.3.3. Study on e-commerce

EETT, taking under consideration the development prospects of e-commerce in Greece and its strategic importance for the postal sector, conducts a study<sup>98</sup> regarding parcel delivery services.

The study includes:

- interviews with greek postal service providers, recording of their specialized services and identification of main problems,
- analysis and recording of e-commerce delivery services in order to stress out the qualitative and quantitative features of the greek, european and global e-commerce market and presentation of the new developments and initiatives of the sector and
- proposals for the improvement of the provided delivery services for the further development of e-commerce as well as for future EETT's regulatory, monitoring and communication actions.

*The study is expected to be completed within 2015.*

### 8.3.4. Annual study on postal market

On an annual basis, EETT, in collaboration with the registered postal service providers, collects and presents quantitative and qualitative data regarding the competitive environment and also the economics, statistics and trends in the postal sector. The purpose of the study is to present an integrated view of

the postal market, its financials and main attributes.

*The annual studies for the greek postal market are available at [www.eett.gr](http://www.eett.gr).*

### 8.4. EETT's supervising actions for postal services

On 31-12-2014, 377 postal service providers were enlisted in EETT's registry, versus 389 in 2013. During the year, 77 licences were granted to new postal service providers, whereas 119 providers were deleted from EETT's registry.

In 2014, 15 postal service providers were summoned to hearings for issues related to their compliance within the current regulatory postal framework and competition framework. Specifically:

- ten companies were summoned to a hearing on licensing issues, a fine was imposed to one, eight received a letter of compliance, whilst one was included in the "other sanctions" category,
- three companies were summoned to a hearing on US issues, a fine was imposed to two and one received a letter of compliance,
- two companies were summoned to a hearing for competition issues. A fine was imposed to the one and the other case was dismissed.

In the framework of its monitoring competence, EETT conducted 89 onsite audits to postal service

providers. According to the findings, the following actions have been decided:

- 15 letters of compliance,
- 1 deletion from EETT's registry,
- 20 hearings.

Moreover, following a large number of consumers' complaints regarding distribution, registered post and parcels' loss by ELTA, EETT invited ELTA to a hearing and a fine was imposed.

### 8.5. Goals for 2015

EETT, regarding postal issues, has set for 2015 the following goals:

- a) Competition promotion and postal market development
  - ELTA cost control. The project includes the approval and evaluation of the existing cost accounting system and evaluation of the economic report of year 2014. Furthermore, upon ELTA request, US net cost calculation will take place along with the evaluation of a new reference model.
  - Conduct of the annual study, which presents the most significant quantitative and qualitative features of the greek postal market.
  - Analysis of the new trends and developments in the postal market on issues, such as e-commerce delivery service, the implementation of US provision obligation and net cost calculation, cost ac-

98. EETT decision 738/017/30-10-2014.



counting in conjunction with the reduction in mail volume and accessibility, market development and its impact on subsequent regulation and also US content.

- In case EETT is granted related competence, a study will be conducted on the analysis of requirements, information system design and postal code administration as public good. The purpose of the study is the development of a postal code system, which, with the use of expanded codes, will indicate recipient's specific building, boost postal market and contribute to the amelioration of US provision nationwide and respond to e-commerce needs.

b) Consumer protection and service quality control

- US quality measurement. The project pertains to the conduct

of US quality measurements for 2015 and also the announcement of new public tender for US quality measurements in 2016.

- Approval of outdoor mailbox cluster installation areas. Following L.4053/2012, outdoor mailbox clusters are installed on the responsibility of municipal authorities in appropriate predefined points in agreement with ELTA.
- Enrichment and maintenance of GIS application for the postal services. In the existing GIS for postal services, the information will be enriched and updated, whilst the application, web and mobile alike will be translated into english.
- Onsite audits to postal service providers for issues related to

their compliance within the current regulatory postal framework.

- Consumer guide on e-commerce delivery services offered by the postal service providers.
- Evaluation of ELTA invoices' re-adjustment and introduction of geographically zonal pricing.

c) Optimization of internal processes

- Further development of the web-based application functions and further automation of the registry procedures.
- Improved communication towards postal market, through regular informative e-mails about laws, regulations and information regarding EETT or other entities (i.e., ministry), news from abroad, publications, studies, presentations etc.

**Table 8.4: Results of EETT hearings in the postal market (2014)**

Subject	Number of hearings	Fines	Letters of compliance	Dismissals	Other sanctions/ Decisions
Licensing	10	1	8		1
Universal Service	3	2	1		
Competition	2		1	1	
<b>Total</b>	<b>15</b>	<b>3</b>	<b>10</b>	<b>1</b>	<b>1</b>

Source: EETT

# 9

## **9.1. International co-operations in the electronic communications sector**

### **9.1.1. Body of European Regulators for Electronic Communications (BEREC)**

The Body of European Regulators for Electronic Communications (BEREC) is a European institution that was set up by Regulation 1211/25-11-2009 of the European Parliament and the Council. Its objective is to contribute to the development and the smooth operation of the internal market of electronic communications networks and services and to ensure the consistent application of European Union (EU) regulatory framework.

In 2014 and following the completion of 2013 EETT's Presidency, the 2013 Annual Report on BEREC activities was prepared and approved by the Board of Regulators at the summit that took place on June 5 & 6, 2014. It was then posted on BEREC's website and was submitted to the competent European institutions (European Parliament, the Council, the Commission, the European Economic and Social Committee and the European Court of Auditors (ECA).

At the same time, EETT participated in the Body's work regarding the Regulation draft for a Single Telecoms Market. To this end, EETT presented its views on improvements to the proposed Regulation and made remarks on the respec-

tive views of other Regulatory authorities in order to ensure that the final proposal will not distort the greek electronic communications market. Special emphasis was given to international roaming issues in order to ensure that the Regulation's provisions would not increase prices for the domestic users taking into consideration Greece's economic crisis.

Furthermore, EETT participated in Expert Working Groups, according to BEREC's working schedule. More particularly, it contributed in the workings and deliverables of groups in relation to regulatory framework, economic analysis, Next Generation Access Networks, international roaming, network neutrality, end-users' issues, benchmarking,



# INTERNATIONAL COOPERATIONS

EETT has developed a broad international network of contacts and cooperations. The Authority's participation in European and international organizations, associations and working groups, on the one hand, aims at promoting Greece's positions and jointly shaping the international developments while on the other hand, ensures the acquisition of expertise in order to address the ever more complicated regulatory issues.

termination rates and regulatory cost-accounting.

By participating in the BEREC's work, EETT contributes to shaping up a common strategy for the single European electronic communications market and concurrently acquires expertise that is used in its regulatory and supervisory work.

## 9.1.2. Independent Regulators Group (IRG)

The Independent Regulators Group (IRG) is a legal entity based in Brussels since 2008. EETT is one of the 33 founding members that have co-signed its memorandum of association and actively participates in its workings. At present, 37 National Regulatory Authorities (NRA) of Europe's electronic com-

munications market are members of the IRG, which also participate in BEREC either as members or as observers.

## 9.2. International cooperations in the radiofrequency spectrum sector

### 9.2.1. Radio Spectrum Policy Group (RSPG)

The Radio Spectrum Policy Group (RSPG) was established under European Commission decision 2002/622/EC as one of the actions of the radio spectrum decision 676/2002/EC. RSPG issues opinions, intended to assist and advise the Commission on radio spectrum policy issues for the coordination of policy approaches and, where appropriate, on harmonization condi-

tions regarding the availability and efficient use of radio spectrum required for the establishment and functioning of the internal market. Member states representatives are active members of the Group. Representatives of the European Economic Area (EEA) countries, the candidate countries, the European Parliament, the European Conference of Postal and Telecommunications administrations (CEPT) and the European Telecommunications Standards Institute (ETSI) participate as observers. The RSPG should perform extended consultations, oriented towards the future technological developments, the market conditions and the regulations relating to the use of radio spectrum in the context of EU policies for electronic communications,



transport and research and development. In these consultations, all relevant spectrum users, both for commercial and for non-commercial purposes as well as any other interested party are involved.

During 2014, RSPG work is summarized as follows:

#### *EU Assistance in bilateral coordination*

The subgroup of RSPG, which mediates in cases of interference between member states and proposes best practices, dealt with cases of interference reported by Malta, Italy and other countries, mediating for solving them.

#### *Efficient awards and use of spectrum*

A working group was established with the aim to gather the experience of member states regarding spectrum auctions and to suggest best practices. At the end of the year, a workshop was organized, where the results of the investigation were presented.

#### *Long-term strategy on the future of the UHF band*

The study and opinion about the European strategy to address the wireless broadband networks growing demand was completed. Supporting the Digital Agenda 2020 objective and on the basis of forecasts for even greater exploitation of the spectrum for the development of broadband networks, the study highlights potential radiofrequency bands that are suitable for this purpose and which in the future could be available in each member state, setting target dates for the 700MHz band which is the digital dividend 2.

#### *Preparation of WRC-15*

The sub-group brought together European positions on the topics of the next World Radio Communication Conference (WRC-15) and informed, at each meeting, all participants for the positions, with a view to their preparation and their support from all member states during the Conference in 2015.

#### *RSPG work program*

Setting up and put into public consultation of the RSPG work program beyond 2015 as well as review and renewal of the radio spectrum program, in accordance with technological and regulatory developments.

#### **Informal meetings**

Finally, RSPG held three informal meetings, where only representatives from member states were involved, in order to discuss the Group's relations with the European Commission, the strengthening of its role as well as actions that can be undertaken in parallel with the cooperation framework within the European Commission.

### **9.2.2. Radio Spectrum Committee (RSC)**

In 2014, EETT participated in the European Union Radio Spectrum Committee (RSC) as an observer. The main issues that were discussed by the Committee in question were:

- work on the completion of the project of creation of a pan-European spectrum inventory with the participation of all member states, which are obliged to submit information about the use of radio spectrum in their country in

the region of 400MHz-6GHz up to 03-12-2015.

- actions and technical studies in order to make the 1.5GHz frequency band available in Europe for the development of broadband wireless networks.
- actions and technical studies in order to make the 2.3-2.4GHz frequency band available in Europe for the development of broadband wireless networks.
- spectrum availability, at European level, for smooth operation of wireless systems supporting TV program production (Program Making and Special Events, PMSE) and especially of wireless microphones, for which there is difficulty in using the UHF television band (that they traditionally used), due to the technical characteristics of digital television, which now uses the band.
- preparation of a report regarding the radio spectrum demand in the harmonized band of the 3.4-3.8GHz, following the questionnaire filled out and submitted by all member states.
- updating of the pan-European harmonized framework for the use of short-range devices.
- discussions on changing of Council decision 2007/131/EC on the harmonized pan-European use of UWB systems (Ultra Wide Band).

### **9.2.3. Working Group Frequency Management (WGFM)**

In 2014, EETT participated in the proceedings of the Working Group Frequency Management (WGFM) of CEPT. The most important is-

sues discussed at the three conferences were (a) making available of the 2.3-2.4GHz frequency band for mobile broadband communications and exploring the implementation of Licensed Shared Access model in this band, (b) exploring the potential uses of the unpaired spectrum in the 2GHz frequency band (1.9-1.92GHz and 2.010-2.025GHz), (c) extension of the use of WAS/RLAN wireless networks in the 5GHz frequency band, (d) terrestrial-based broadband communications links to aircraft (BDA2GC) and (e) white space devices in the UHF band.

#### 9.2.4. COCOM Working Group for Mobile Satellite Service

Based on the European Commission decision 2009/449/EC115 on 13-05-2009 two mobile satellite services operators were selected to provide services in 27 member states. For the first time, the operators are centrally selected by the European Commission on a harmonized frequency band.

The Mobile Satellite Services (MSS) authorisation is performed under a general authorisation regime and the appropriate rights to use the radiofrequencies are granted to the two chosen operators, in accordance with Decision 2009/449/EC and national legislation. Member states were required to respond directly by setting up the licensing regime and the spectrum usage fees to facilitate the development of the MSS. EETT responded to this obligation and, since 13-05-

2011, has applied the MSS authorisation framework issuing relevant decisions. It is worth noting that in order to ensure coordination of the member states regarding the control and the sanctions, the Commission adopted a relevant decision<sup>99</sup>. EETT participates in the MSS Implementation Group of COCOM and cooperates closely with the other member states.

#### 9.2.5. CEPT-ECC Project Team FM22

Project Team FM22 belongs to the Frequency Management Working Group (WGFM) of the Electronic Communications Committee (ECC) of CEPT. Within the PT's object are issues of spectrum monitoring measurements as well as issues of spectrum monitoring and control regulation.

Representatives of European Regulators dealing with spectrum monitoring are participating in this project team. The results of the work of the Team are submitted to the WGFM for approval and are then forwarded to ECC, in order to be adopted as official ECC documents (recommendations, reports, directives).

EETT participates in the Project Team (PT) FM22 over the past ten years.

The PT FM22 biannual meetings were held in Vilnius, Lithuania and Copenhagen, Denmark in April and September 2014, where many spectrum monitoring issues were

discussed, of which the most important were the following:

- draft Recommendation for the accuracy of spectrum monitoring measurements,
- draft Recommendation for spectrum management and monitoring needs in major events (e.g., Olympic Games),
- draft Recommendation for the measurements of LTE networks radio coverage,
- issues related to recent technological developments (e.g., switch-over to digital TV) and
- collection of statistics concerning interference cases submitted to the regulatory authorities in each country in order to draw relevant conclusions.

#### 9.2.6. Telecommunications Conformity Assessment and Market Surveillance Committee (TCAM)

In 2014, EETT participated in the proceedings of the Telecommunications Conformity Assessment and Market Surveillance Committee (TCAM), which took place in June and November 2014 in Brussels. TCAM assists the European Commission in matters relating to radio equipment and telecommunications terminal equipment. The most important issues discussed were the new RTTE Directive, the categorization of equipment into classes, the adequacy of existing standards in order to ensure health protection from electromagnetic

99. European Commission decision 2011/667/EU 10-10-2011 on modalities for coordinated application of the rules on enforcement with regard to mobile satellite services (MSS) pursuant to article 9 par.3 of decision No 626/2008/EC of the European Parliament and of the Council.



fields, the compatibility of industrial automation applications, operating in the 2.4GHz band with the existing harmonized standards, the implementation of a common type of charger for the majority of electronic devices and the possibility of applying performance marking in mobile phone antennas.

### 9.2.7. RTTE Market Administrative Cooperation Group (ADCO)

Since 2002, EETT has participated in the Administrative Cooperation Group (ADC) on topics concerning the surveillance of the Radio & Telecommunications Terminal Equipment (RTTE), which constitutes an official committee of the European Free Trade Zone (EFTZ), in which every member state participates with its representative. Three meetings of the ADCO RTTE took place in 2014 for exchanging information and cooperating with the respective European market surveillance authorities. More specifically, the purpose of the work of ADCO is:

- analysis and dealing with technical issues relating to standards, technical measurements, new technologies, etc.,
- exchange of know-how between member states concerning equipment that does not conform to Directive 99/5. This information is used for scheduling RTTE inspections carried out by EETT,
- formulating important guidelines

(Guidance Documents, Code of Practices etc) to facilitate market surveillance authorities,

- investigation and clarification of certain technical issues raised by TCAM,
- gathering of statistical data through specialized market surveillance campaigns, from which useful conclusions are extracted and campaigns are arranged at European level,
- gathering and analysis of statistical data for specialized market surveillance campaigns performed at national level,
- cooperation with other committees and organizations (PTFM22, ETSI, notified bodies, ECO, the RTTE CA Committee (Compliance Association)<sup>100</sup> etc.),
- issues relating to the revised RTTE Directive which was adopted in 2014 and includes: a new way of marking and monitoring RTTE, the creation of a new central database for manufacturers to record the information and technical files for equipment, the use of a joint European database by supervisory authorities etc.

In line with the above, in 2014 EETT took part in a European campaign to control mobile telephony repeaters, which are widely available in the European market. The results of that campaign focused on achieving radio equipment compliance with the essential re-

quirements and were announced on the appropriate EU website<sup>101</sup>.

## 9.3. International cooperations in the postal services sector

### 9.3.1. European Regulators Group for Postal Services (ERGP)

EETT actively participates in ERGP activities for the postal services, which promote the coordination and cooperation among the NRAs for the achievement of the postal reform objectives in Europe.

In 2014, EETT participated in the following conferences:

- In October 2014, at the conference in Lisbon, where ERGP approved three reports as regards to the methodology for US net cost calculation, optimum practices for consumer protection, service quality and complaint management and also competition and access to the European postal network.
- In November 2014, at the conference in Bucharest, where ERGP approved six reports regarding the optimum practices and current trends about consumer protection, US quality, complaint management, cross-border commerce and also the indicators for postal market monitoring.

Additionally, EETT takes an active part in the following ERGP working groups:

- cost issues and pricing,

100. <http://www.rtteca.com/>

101. [http://ec.europa.eu/enterprise/sectors/rtte/news/index\\_en.htm](http://ec.europa.eu/enterprise/sectors/rtte/news/index_en.htm)

- net cost for the Universal Service Provision—the VAT as benefit/burden,
- end-user satisfaction and monitoring the European postal market outcomes.

### 9.3.2. Universal Postal Union (UPU)

In March 2014, EETT participated in an e-commerce conference held by the Universal Postal Union (UPU), in Berne. The purpose of the meeting was to point out e-commerce potential and also the challenges and expectations of the involved parties. During the conference, issues, such as the current and future trends of e-commerce and postal sector, were discussed by the executives of international organizations, postal companies and e-shops, who participated in the conference.

### 9.3.3. Postal Directive Committee (PDC)

In June 2014, EETT took part in the meeting of the European Postal Directive Committee (PDC), which was held in Brussels. Within the framework of the meeting, the following issues were discussed:

- results of the study of “WIK Consult” “Parcel roadmap – completing the single market for parcel delivery”,
- update on the “Study on the design and development of initiatives to support the growth of e-commerce via better functioning parcel delivery systems in Europe” by “WIK Consult”,
- US quality measurement results,
- presentation of the “Single mar-

ket scoreboard”, a dynamic and flexible tool for monitoring the trends and performance indicators of EU member states.

### 9.3.4. Cooperations with the PRC’s NRA

In May 2014, EETT signed a memorandum of understanding with the Chinese NRA “State Post Bureau”, in order to establish the cooperation between the two NRAs on issues of postal market monitoring in Greece and China.

The memorandum offers to the two NRAs the opportunity to exchange knowledge and best practices on regulatory and market development issues, US safeguarding and e-commerce development. What is more, there is the prospect of cooperation in international level, especially within UPU framework.

### 9.3.5. Participation in other conferences

In April 2014, EETT participated in a meeting held by “WIK Consult” in Brussels, where the first results of the aforementioned e-commerce study, based on data gathered from EU member-states, among which Greece, were presented. During the meeting, EETT presented the “Retail price Observatory for postal services in the Greek market”.

In June 2014, EETT took part in the “Rutgers conference on postal and delivery economics” in Rome, in regard to postal economic and delivery issues. During the conference, the discussion topics included trends and strategies in US sector, regulation, e-commerce and new services and develop-

ments in pricing, market analysis and competition monitoring.

In September 2014, EETT attended the activities of “Post Expo” in Stockholm. In that context, innovative proposals and technological developments in the postal sector were presented such as automated clearance and classification processes, hybrid mail services, advanced transportation, monitoring of products delivery processes, developments in e-commerce and new growth prospects in the postal market.

In November 2014, EETT participated in “FITCE Europe 53<sup>th</sup> conference “From Network Infrastructures to Network Fabric: revolution at the edges”, in Naples. EETT presented the topic “Electronic applications for e-commerce and postal services” and took part in a round table discussion regarding “Digital agenda for Mediterranean”.

## 9.4. Goals for 2015

Regarding international relations, EETT has set the following objectives:

- Contributing to the shaping of European developments in electronic communications, through participation in BEREC and IRG.
- Participation in European and international developments in the field of radio and systematic monitoring of technological and regulatory developments in matters of spectrum and radio frequencies.
- Assistance to the Ministry and generally the Greek State to re-



present the country in European and international organizations.

- Participation in international organizations and fora related to postal services (i.e., ERGP, UPU, CERP etc.).
- Participation in international conferences on postal services. EETT, in 2015, will take part in the European Regulators Group for Postal Services (ERGP) and especially at contact network and in the groups “Net cost of USO”, “Market indicators and consumers”, “Cross-border mail” and “Regulatory/Accounting/Price regulation”. Moreover, EETT’s role in UPU will be reinforced, due to its election for first time in UPU administration council. EETT will, additionally, participate in CERP.





## (a) EETT's legislative/regulatory framework (01-01-2014 to 31-12-2014)

(i) Electronic communications						
Decision number			Title	Government Gazette (GG)		
Plenary session	No.	Date		No.	Issue	Date
706	010	06-02-2014	Approval of the request of the three mobile network providers (COSMOTE, VODAFONE, WIND) concerning the extension of the deadline for the submission of the reference offer implementing the accounting separation obligation, according to EETT's decision no. 660/04B/12-07-12 (GG Issue 2426/B/03-09-2012).	681	B	19-03-2014
707	002	13-02-2014	Granting of radiofrequency rights of use for digital terrestrial broadband television and the provision of publicly available electronic communications services to the company under the name "Digital Broadcasting Telecommunications Services Provider Société Anonyme" under the title "DIGEA-Digital Operator SA".	1676	B	24-06-2014
708	014	20-02-2014	Amendment of EETT's decision no. 696/115/11-07-2013 «Amendment and codification of the Regulation on number portability in the greek market into a single text» (GG Issue 1873/B/11-07-2013).	557	B	06-03-2014
709	024	06-03-2014	Repeal of the EETT decision no. 694/14/18-06-2013 «Guidelines on the placing of radioequipment products on the market and putting into service (GG Issue 1640/B/02-07-2013)».	797	B	01-04-2014
709	079	06-03-2014	Transfer of competencies of the Plenary of EETT to the President, the Vice Presidents and the heads of the EETT administration units.	797	B	01-04-2014
710	014	13-03-2014	Procedure regulating the application of art. 2.1.16. of the EETT's decision no. 676/41/20-12-2012 «Regulation for General Authorisations» (GG Issue 298/B/14-02-2013) regarding the IMEI codes of stolen mobile devices.	1044	B	25-04-2014
714	009	10-04-2014	(a) Definition of the markets for call origination and for call termination on the public telephone network provided at a fixed location, identification of operators with Significant Market Power and their obligations (3 <sup>rd</sup> round of market analysis). (b) Deregulation of the market of transit services in the fixed public telephone network.	1049	B	28-04-2014

Decision number			Title	Government Gazette (GG)		
Plenary session	No.	Date		No.	Issue	Date
714	010	10-04-2014	Amendment of EETT's decision no. 677/03/8-1-2013 «Amendment and codification of EETT's decision number 441/121/21-06-2007 «Regulation for the management and assignment of numbering resources of the National Numbering Plan»» (GG Issue 170/B/31-01-2013).	1301	B	22-05-2014
716	003	30-04-2014	Amendment and codification of EETT's decision no. 707/2/13-02-2014 "Granting of Radiofrequency rights of use for digital terrestrial broadband television and for the provision of publicly available electronic communications services to the company under the name "Digital Broadcasting Telecommunications Services Provider Société Anonyme" and under the title "DIGEA-Digital Operator SA".	1693	B	25-06-2014
716	007	30-04-2014	Finalisation and confirmation of the technical and economic model applied to determine the "price ceiling" charged by the company under the title "DIGEA-Digital Operator SA" for the transfer and distribution of content services with national or regional coverage.	1587	B	17-06-2014
717	005	08-05-2014	Starting of the operation of the web application Preliminary Test Model for the examination of OTE bundled services.	1361	B	28-05-2014
719	001	22-05-2014	Results of the cost accounting audit of the Hellenic Telecommunications Organisation SA (OTE SA) for 2014 (with actuals for 2012) for the regulated wholesale and retail markets for which there are obligations for price control, cost accounting and accounting separation and other provisions.	1564	B	13-06-2014
721	002	12-06-2014	Regulation of the conditions for the use of individual radiofrequencies or radio frequency bands.	1713	B	26-06-2014
721	006	12-06-2014	Amendment of the «Regulation for General Authorisations» regarding the provision of regulated voice, sms and data roaming services provided to greek consumers by alternative roaming providers.	1786	B	30-06-2014

Decision number			Title	Government Gazette (GG)		
Plenary session	No.	Date		No.	Issue	Date
723	002	26-06-2014	Determination of the procedure regulating the electronic submission of Declarations concerning the Installation of Standardised Antenna Constructions.	2179	B	08-08-2014
728	003	24-07-2014	Amendment and codification of EETT decision no. 482/051/27-05-2008 «Methodologies/Principles of cost-accounting and accounting separation when implementing the regulatory obligations of price control, cost-accounting and accounting separation imposed on the operator designated as having SMP in the individually defined electronic communications markets» (GG 1151/B/24-06-2008).	2201	B	11-08-2014
729	010	31-07-2014	Amendment of provisions of OTE's reference offer for the wholesale broadband access (WBA), implementing EETT's decision no. 614/12/28-07-2011 (GG Issue 1983/B/07-09-2011) as modified by EETT's decision no. 654/11/31-05-2012 (GG Issue 1846/B/13-06-2012).	2405	B	09-09-2014
732	004	11-09-2014	Decision upon the notified draft measures for laying down the terms/conditions for the provision of access and interconnection services including the Application Programming Interface (API) & the Electronic Program Guides (EPG), implementing art. 46 par. 3, 47 par. 1-3, 48 par. 1-3 and art. 49 par.3 of the L. 4070/2012 (GG 82/A'/10-04-2012), replacing EETT decisions no. 506/37/13-01-2009 (GG Issue 369/B/03-03-2009) and no. 548/19/15-01-2010 (GG Issue 161/B/ implementing articles 16 par. 2 & 3 and 45 par. 1 of L. 4070/2012 and article 7 par. 3 of the EU Directive 2002/21/EE as amended".	2940	B	31-10-2014
735	006	09-10-2014	Amendment of EETT's decision no. 696/115/11-07-2013 «Amendment and codification of the Regulation on number portability in the Greek market into a single text» (GG Issue 1873/B/31-70-2013) as modified by EETT decision no. 708/014/20-02-2014 (GG Issue 557/B/06-03-2014).	2986	B	05-11-2014
737	010	13-10-2014	Amendment of the Regulation on the management and assignment of [.gr] domain names.	3054	B	13-11-2014

Decision number			Title	Government Gazette (GG)		
Plenary session	No.	Date		No.	Issue	Date
737	011	13-10-2014	Amendment of EETT decision no. 677/03/31-03-2013 «Amendment and codification of the Regulation for managing and assigning numbering resources of the National Numbering Plan” (GG 170/B/31-01-2013) as applies.	3061	B	13-11-2014
<b>b) Postal Services</b>						
708	022	20-02-2014	Provision of information by the postal services providers through questionnaires.	946	B	15-04-2014
710	019	13-03-2014	Decision regulating the terms and conditions for the distribution of postal items, possible derogations and specific arrangements for home distribution of postal packages weighing up to twenty (20) kilograms, within the provision of Universal Postal Service.	1441	B	04-06-2014
728	006	24-07-2014	Regulation on the access to the Universal Service Provider postal network of the postal service providers with Individual License.	2589	B	29-09-2014

## EU Legislation

Recommendation of the Commission C(2014) 7174, of 09-10-2014 on relevant product and service markets within the electronic communications sector susceptible to ex ante regulation in accordance with Directive 2002/21/EC of the European Parliament and of the Council on a common regulatory framework for electronic communications networks and services.

(<https://ec.europa.eu/digital-agenda/en/news/commission-recommendation-relevant-product-and-service-markets-within-electronic-communications>).

## b. Glossary

TERM	EXPLANATION
<b>Administrative Cooperation (ADCO)</b>	Committee responsible mainly for supporting actions with regard to the joint resolution of problems and the exchange of experiences on issues of Radio and Telecommunications Terminal Equipment (RTTE) market surveillance.
<b>Asymmetric Digital Subscriber Line (ADSL)</b>	A technology for data transmission that operates over a traditional telephone line, but achieves higher rates of transmission than traditional modems (i.e., the equipment that converts the digital sign originating from an electronic computer signal to an analog sign).
<b>Body of European Regulators for Electronic Communications (BEREC)</b>	BEREC replaced the European Regulators Group (ERG). Its goal is to contribute to the development of the electronic communications market in the EU through the creation of a single regulatory environment in the member states.
<b>Broadcasting</b>	Transmission of sound and/or optical signals (programs) to a broad number of recipients (audience or viewers).
<b>Business Express Post (BEP)</b>	Business Express Post (BEP) is a prepaid envelope service offering next day delivery for consumer and business mail.
<b>Carrier pre-selection</b>	The option given to OTE subscribers, upon request, to select as default the operator who will process one or more categories of calls (international, local, long distance calls and calls to mobile phones), without dialling the 4-digit or 5-digit code as in the case of carrier selection (provider).
<b>Carrier selection</b>	The option offered to OTE subscribers to make calls through another operator by dialling a special 4-digit or 5-digit carrier selection code assigned to the specific operator before the calling number.
<b>Comité Européen de Réglementation Postale (CERP)</b>	A committee established in 1992 in the framework of CEPT (European Conference of Postal and Telecommunication Administration) with the purpose of regulating the postal market.
<b>Consumer Commitment Chart</b>	Postal companies under General License owe to compose a Consumer Commitments Chart, which includes: (a) description of the attributes and timeframe of the provided services, (b) user information regarding the prices, based on the formulating factors, which include the expected service quality improvement, (c) a Dispute Resolution Committee, where a users' representative may participate and the user (consumer) may also exercise his right to attend. The Chart includes all necessary information regarding the attributes of the postal company, its obligations and commitments towards the users as regards to company responsibility, postal service management, customer service and compensation provision.
<b>Digital Video Broadcasting-Terrestrial (DVB-T)</b>	A model for terrestrial digital TV.
<b>Distant collocation</b>	Form of collocation in which, in accordance with OTE's legal obligations, an electronic communications operator obtains access to OTE resources through connecting cables.
<b>Double play services</b>	The term is used in electronic communications for the provision of two different services. It may refer to any combination of the following four services: (1) fixed telephony, (2) Internet access, (3) television or video over the Internet and (4) mobile telephony. However, it most commonly refers to the combination of fixed telephony and Internet access.
<b>Electronic Observatory of retail prices of postal services</b>	Final version EETT's electronic Observatory of postal services' retail prices that provides the public with the implicated providers' reported data and retail prices of the postal services in a unified and standard file format.
<b>Electronic repository</b>	Sub-project of the electronic Observatory of postal services' retail prices, which constitutes the final version of EETT's retail price platform of postal services. The system is updated through a secure web tool by the postal service providers with primary retail data, according to the requirements of a standard file format for invoiced data as these are provided in EETT's website.

TERM	EXPLANATION
<b>European Competition Network (ECN)</b>	A network consisting of the European Commission and the competition authorities of the member states with the aim of protecting competition. It constitutes a mechanism for consultation and cooperation in the framework of implementing the competition policy of the European Community.
<b>European Regulators Group for Postal Services (ERGP)</b>	Established in 2010 by the European Commission, aiming to develop best regulatory practice in Europe on issues related to postal services. It is composed of 28 NRAs from EU member states.
<b>Exemption areas</b>	Areas where postal service is provided for less than five working days a week.
<b>Fixed service (Radio-communications)</b>	Radio communications service which includes wireless electronic communications networks between specified fixed points for the implementation of which radiofrequencies are used.
<b>Frequency map</b>	Map of the available channels for use at a specific geographic location and under specific circumstances.
<b>Fully Distributed Cost</b>	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 set of algorithms.
<b>General Authorisation</b>	Authorisation that enables the postal service provider to exercise the privileges of the license with no further need of an explicit decision by EETT.
<b>Geographic Information System (GIS)</b>	A system for spatial data and correlated properties. In the strict sense, it is a digital system able to integrate, store, adapt, analyze and present geographically marked (referenced) information. In its most general form, it is a "smart map" tool that allows users to create interactive questions (searches created by the user), analyze spatial data and adjust them. A key feature of GIS is that they work with geographical coordinates unlike other vector design systems (CAD).
<b>Geographic numbers</b>	The numbers whose prefix denotes the geographic location of the number holder.
<b>Glasnost</b>	A tool that checks whether the telecommunications operator is applying selective setting practices with respect to certain services, known as traffic shaping, which throttle the speed of the connection.
<b>Independent Regulators Group (IRG)</b>	A group comprising 45 European Regulatory Authorities, which was established in 1997, aiming at the exchange of views, experiences and practices among its members concerning issues of common regulatory interest. In 2008, the process of its establishment as a legal entity was completed according to Belgian law. It is based in Brussels.
<b>Individual License (postal services)</b>	All licenses that grant special privileges to the prospect postal service provider or the licenses due to which the activities of the provider depend on special obligations which supplements the General License where applicable, whereas the postal service provider is not entitled to exercise respective rights until the issuance of respective ministerial decision regarding USP and EETT decision regarding the other postal service providers.
<b>Interconnection</b>	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.
<b>Interconnection link</b>	The link between OTE's switching centre (node) and the switching centre of an electronic communications provider which enables Interconnection.
<b>Interference</b>	The result of an unwanted action due to one or more transmissions, radiations or inductions during reception in a radio system. It appears as a loss of performance, wrong interpretation or loss of information which would have been otherwise received, had this unwanted action not taken place.

TERM	EXPLANATION
<b>Jammers</b>	Devices that interfere in mobile telephony radiofrequency transmissions, thus preventing their reception.
<b>Link</b>	All telecommunications equipment required for the implementation of the connection between two points of an electronic communications network.
<b>Long-Run Incremental Cost</b>	A costing methodology used to calculate the effective cost derived from producing ultimately a specific increment and is based on the assumption that the specific production has already taken place.
<b>Long Term Evolution (LTE)</b>	State-of-the-art technology used for high speed wireless communication and networking of mobile devices.
<b>Mobile service</b>	Radio service between mobile stations and fixed stations or between mobile stations.
<b>Monitoring System of postal services' retail price</b>	Information system for the automated and digital representation, collection and provision to users/consumers of retail prices and other attributes of postal services in a unified and standard format.
<b>National Numbering Plan</b>	The set of rules defining the structure of numbers used by electronic communications operators for the provision of services to users.
<b>Net Cost of Universal Service (NCUS)</b>	NCUS refers to all necessary and relevant costs for providing Universal Service (US) and constitutes the difference between the net operating cost of the Universal Service Provider (USP) including US provision and the operating cost of the same provider without it (the so called reference model).
<b>Network Diagnostic Tool (NDT)</b>	A tool for measuring the real download and upload speed of a user's connection, round trip time (RTT) and packet loss at a specific geographical area and time (e.g., low speed at peak hours). Moreover, it allows users to compare their actual speed with the maximum speed theoretically supported by their connection, depending on the distance to the closest local exchange (L/E).
<b>Next Generation Access Networks (NGAs)</b>	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, if desired, could provide continuous service coverage to the user and access to more than one service operators simultaneously.
<b>Outdoor mailbox clusters</b>	Enclosed boxes enabling users to receive postal items, which are installed – in agreement with USP and local municipalities – in appropriate predefined points in areas, where street numbering is deficient or streets are not uniquely named.
<b>Physical collocation</b>	Form of collocation in which OTE, in accordance with its legal obligations, constructs a special space in its local exchanges which is reserved for installing the equipment of electronic communications operators.
<b>Postage with insured value</b>	The postage with insured value refers to the insurance of the postal item up to the value declared by the sender in case of loss, theft or damage.
<b>Postal network</b>	The organization system and all kinds of resources used by USP for: (a) the clearance of postal items under US obligation, (b) postal items delivery and handling from the postal network access point to the distribution center, (c) postal items delivery to the specific address.
<b>Premium Rate Service (PRS)</b>	A call whose charge is higher than the maximum normal charge for geographic numbers within the country, with part of the increased charge going to the called party who is assigned that number.
<b>Private Mobile Radio networks (PMR)</b>	Private Mobile Radio (PMR) networks. The term is used to describe professional terrestrial mobile service radio networks, which are used to meet the communication needs of various professional users as well as for emergency services.



TERM	EXPLANATION
<b>Quad play services</b>	The term used in electronic communications to describe the combined provision of four different services which are usually the following: (1) fixed telephony, (2) Internet access, (3) television or video over the Internet and (4) mobile telephony.
<b>Radio and Telecommunications Terminal equipment (RTTE)</b>	Equipment which includes a transmitter and/or receiver and provides communication through radio waves by means of spectrum.
<b>Radio Spectrum Committee (RSC)</b>	RSC was established by decision of the European Commission to define harmonized conditions for the availability and the effective use of the radio spectrum, which are necessary for the establishment and operation of the internal market in community policy fields, such as electronic communications, transport and research and development.
<b>RAPEX</b>	RAPEX is a European rapid alert system for dangerous products. It ensures that information regarding dangerous products –that are withdrawn from the market and/or recalled from consumers anywhere in Europe– are forwarded directly between the member states and the Commission in order to take appropriate measures in the EU.
<b>Reception desk</b>	Business area for the receipt or on-the-spot delivery of postal items, excluding any other postal service (i.e., clearance or forwarding for delivery). The reception desk may be in place with other post office or stand alone. Postal agencies may be considered as reception desk as well.
<b>Registered postal item</b>	Service regarding the guaranteed delivery against the risk of loss, theft of damage, which is provided to the sender upon request and the receipt of postal item's deposit and/or its delivery to the recipient.
<b>Retail price (postal services)</b>	The shipping price of one or multiple postal items to one recipient, according to the pricelist of the postal service provider. The shipping cost represents the final charge to the consumer, including VAT, where applicable.
<b>Satellite services</b>	Services whose provision is based in whole or in part on the installation and operation of earth satellite station networks. These services include at least a radio link via earth satellite stations with the space part (uplinks) and radio links between the space part and earth satellite stations (downlinks).
<b>Shared collocation</b>	Refers to the capability of locating an electronic communications operator's equipment in a space within OTE's local exchanges where the related equipment of OTE is hosted. In the event of shared collocation, which OTE provides in accordance with its legal obligations, equipment maintenance and operation is carried out by the operator.
<b>Significant Market Power (SMP)</b>	An enterprise is considered to hold Significant Market Power when, either individually or in cooperation with other enterprises, it holds a position equivalent to a dominant position, i.e., one of financial power which allows it to operate to a great extent independently of the competition, the customers and, in the end, the consumers.
<b>Small packet</b>	Postal items, the dimensions of which exceed letter limits and weigh less than 2 kg.
<b>Soil Moisture and Ocean Salinity Satellite (SMOS)</b>	A satellite used as part of the Living Planet Program of the European Space Agency (ESA) for collecting information on Earth's water cycle and climate change.
<b>Telecommunications Conformity Assessment and Market Surveillance Committee (TCAM)</b>	Committee established to assist the European Commission and consult on monitoring tasks as far as the application of Directive 99/5/EC is concerned and, if it is deemed appropriate, to issue directives for various issues.
<b>Terminal dues</b>	USP remuneration for the distribution of incoming cross-border mail, i.e., postal items sent from another EU member-state or a third country.
<b>Time Division Multiplexing (TDM)</b>	Time Division Multiplexing (TDM) is a technique for separating signals through time. TDM is used in transmitting digital signals, where the transmission time is separated into time segments and each signal is transmitted in a specific time segment.

TERM	EXPLANATION
<b>Transmit</b>	A service where one of the two contracting parties transmits a call to the network of a third party, coming from the network of another contracting party.
<b>Triple play services</b>	The term is used in electronic communications to describe the combined provision of three different services. Usually, the term refers to any combination of three of the following four services: (1) fixed telephony, (2) Internet access, (3) television or video over the Internet and (4) mobile telephony.
<b>Ultra Wide Band (UWB)</b>	A new form of wireless technology based on low power transfer and codified impulses at a short distance environment. It is used in commercial and industrial applications to determine distances among objects, security systems and medical systems. It is also applied on television, on the Internet, on computers and on wireless local area networks (WLANs) and in secret communications.
<b>UNEX</b>	UNEX is a quality measurement system for the Universal Service of cross border mail in European countries sponsored by the International Post Corporation (IPC). UNEX does not pertain solely to EU member states, but Europe as a whole.
<b>Universal Postal Union (UPU)</b>	UPU is the primary forum for cooperation between postal sector players. It helps to ensure a truly universal network of up-to-date products and services.
<b>Universal Service (US) (in the electronic communications sector)</b>	The provision of a fixed set of basic electronic communications services available to all citizens of Greece, irrespective of their geographic location, at affordable prices.
<b>Universal Service (US) (in the postal services sector)</b>	Universal Service (US) refers to the conventional postal service. It is the right granted to postal services users, irrespective of their location in Greece, to permanently and affordably enjoy high quality postal services. According to L.4053/2012, US includes the following individual services for domestic and cross-border post: (a) the collection, transportation, sorting and distribution of postal items up to 2 kg, (b) the collection, transportation, sorting and distribution of postal parcels up to 20 kg and (c) services of registered mail and deliveries with a declared value.
<b>Very High Speed Digital Subscriber Line (VDSL)</b>	The very high speed digital subscriber line is a technology providing faster data transmission than ADSL.
<b>Virtual collocation</b>	Refers to the capability of collocating an electronic communications operator's equipment in a space within OTE's local exchanges (L/Es) where the related equipment of OTE is hosted. In the event of virtual collocation, which is provided in accordance with OTE's legal obligations, maintenance and operation of the equipment is carried out by OTE.
<b>Virtual Partial Unbundled Loop</b>	Combined wholesale service of OTE, which permits the provider to offer voice services (through LLU) and VDSL high speed Internet (through Wholesale Broadband Access) to retail customers.
<b>Web based application (postal services)</b>	Service through EETT's website for the support of the processes regarding the registration of postal companies to EETT registry, the deletion from the registry, the modification of General License related data, the provision of registration confirmation and other data regarding postal network and any other request or services to be defined by EETT.
<b>WIK Consult</b>	WIK is an independent, scientific research institute on communication services and infrastructure issues, under the German government. WIK Consult is a subsidiary of WIK, which was founded in 2001 and specializes in regulatory matters.
<b>Wireless Fidelity (WiFi)</b>	Wireless local network which uses radio frequencies to transmit and receive data, based on the IEEE 802.11 standards group.
<b>Working Group Frequency Management (WGFM)</b>	Working Group of the Electronic Communications Committee (ECC) that is responsible for the management of frequencies at the level of member states of the European Conference of Postal and Telecommunications Administrations (CEPT).

## c. Abbreviations

ADAE	Authority for Communication Security and Privacy
ADCO	Administrative Cooperation Group
ADSL	Asymmetric Digital Subscriber Line
API	Application Programming Interface
ARP	Alternative Roaming Provider
BEREC	Body of European Regulators for Electronic Communications
BRA – ISDN	Basic Rate – Integrated Services Digital Network
CEPT	European Conference of Postal and Telecommunications Administrations
CERP	Comité Européen de Réglementation Postale
CoCom	Communications Committee
CRC	Communications Regulation Commission (Bulgaria)
CSS	Consumer Service Sector
CVV	Civil Aviation Authority
DCS	Digital Communication System
DECT	Digital Enhanced Cordless Telecommunications
DSL	Digital Subscriber Line
ECA	European Court of Auditors
ECC	Electronic Communications Committee
EEA	European Economic Area
EET	Hellenic Telecommunications Committee
EETT	Hellenic Telecommunications and Post Commission
EITO	European Information Technology Observatory
ELAS	Greek Police
ELSTAT	Hellenic Statistical Authority
ELTA	Hellenic Post
ERGP	European Regulators Group for Postal Services
ESA	European Space Agency
ETSI	European Telecommunications Standard Institute
EU	European Union
FAQ	Frequently Asked Questions
FITCE	Fédération des Ingénieurs des Télécommunications de la Communauté Européenne
FORTH	Foundation for Research & Technology Hellas
FTTC	Fiber to the Curb

GAEC	Greek Atomic Energy Commission
GG	Government Gazette
GIS	Geographical Information System
GSM	Groupe Speciale Mobile Association
ICT	Information & Communication Technologies
IDIKA	Electronic Governance of Social Security
IEEE	Institute of Electrical and Electronics Engineers
IMEI	International Mobile Equipment Identity
IP	Internet Protocol
IPC	International Post Corporation
IRG	Independent Regulators Group
ISDN	Integrated Services Digital Network
ITU	International Telecommunication Union
JMD	Joint Ministerial Decision
KEPE	Centre of Planning and Economic Research
KPI	Key Performance Indicator
LAN	Local Area Network
LLU	Local Loop Unbundling
LRAIC	Long Run Average Incremental Cost
LRIC	Long Run Incremental Cost
LTE	Long Term Evolution
MMS	Multimedia Message Service
MOOC	Massive Online Open Course
MSS	Mobile Satellite Services
MVNO	Mobile Virtual Network Operator
NATO	North Atlantic Treaty Organization
NCRTV	National Council for Radio and Television
NFC	Near Field Communication
NGA	Next Generation Access networks
NGN	Next Generation Networks
NNP	National Numbering Plan
NRA	National Regulatory Authorities
NTUA	National Technical University of Athens
NRDNP	National Reference Database on Number Portability
NSRF	National Strategic Reference Framework

OECD	Organization for the Economic Co-operation and Development
OSE	Hellenic Railways Organization
OTE	Hellenic Telecommunications Organization
PDC	Postal Directive Committee
PMR	Private Mobile Radio
PMSE	Program Making and Special Events
POTS	Plain Old Telephone Service
PRS	Premium Rate Services
PSI	Program Specific Information
PSTN	Public Switched Telephone Network
PTM	Preliminary Test Module
PtMP	Point to Multipoint
PtP	Point to Point
RAPEX	RApid EXchange
RLAN	Radio Local Area Networks
RIO	Reference Interconnection Offer
RO	Regional Office
RSC	Radio Spectrum Committee
RSPG	Radio Spectrum Policy Group
RSPP	Radio Spectrum Policy Program
RTTE	Radio and Telecommunications Terminal Equipment
RUO	Reference Unbundling Offer
SHDE	Electronic Document Management System
SILYA	Electronic Submission of Applications System
SMOS	Soil Moisture and Ocean Salinity Satellite
SMS	Short Message Service
STEP-C	Science and Technology Park of Crete
TCAM	Telecommunications Conformity Assessment and Market Surveillance Committee
TDM	Time Division Multiplexing
TETRA	Terrestrial Trunked Radio
TMT	Technology, Media and Telecommunications
UHF	Ultra High Frequency
UMTS	Universal Mobile Telecommunications System
UPU	Universal Postal Union
US	Universal Service

USP	Universal Service Provider
UWB	Ultra Wide Band
VAT	Value Added Tax
VHF	Very High Frequency
VDSL	Very High Speed Digital Subscriber
VoD	Video on Demand
VoIP	Voice over Internet Protocol
VPU	Virtual Partial Unbundled Loop
WAS / RLAN	Wireless Access Systems / Radio Local Area Network
WBA	Wholesale Broadband Access
WGFM	Working Group Frequency Management
Wi-Fi	Wireless Fidelity
WLAN	Wireless Local Area Network
WLR	Wholesale Line Rental

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# APPENDIX







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