

ANNUAL REPORT 2002



ΕΠΤ

HELLENIC REPUBLIC
NATIONAL TELECOMMUNICATIONS
AND POST COMMISSION

ANNUAL REPORT 2002

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Administration

The present Annual Report refers to the activities of EETT during the period from 1 January to 31 December 2002.

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

EMMANOUIL GIAKOUMAKIS
PRESIDENT

DIMITRIOS DIMITROPOULOS
VICE-PRESIDENT FOR THE SECTOR
OF TELECOMMUNICATIONS

ARISTIDES MANTAS
VICE-PRESIDENT FOR THE SECTOR
OF POSTAL SERVICES

DIMITRIOS ZACHARIADIS
MEMBER

EMMANOUIL KONDYLLIS
MEMBER

VASSILIOS MAGLARIS
MEMBER

FILIPPOS SPYROPOULOS
MEMBER

CHARISSIOS TAGARAS
MEMBER

DIMITRIOS CHRYSOULIDIS
MEMBER



Introduction by the President

The main responsibility of the National Telecommunications and Post Commission (EETT), as an Independent Administrative Authority, is to supervise, control and regulate the telecommunications and postal services markets in Greece.

The year 2002 witnessed the conclusion of a number of important developments in the telecommunications market, as it was the second year since the market's full liberalisation. These developments created the possibility for consumers to choose among a number of fixed service providers. This had an immediate effect in enhancing the role of consumers.

During the same year, EETT issued a number of Regulatory Acts with the purpose of regulating matters in the telecommunications sector, relating mainly to Interconnection, Unbundled Access to the Local Loop, Leased Lines, assignment of Internet Domain Names, Electronic Signature and Universal Service. Of particular significance were also the regulatory interventions by EETT concerning reduction of call termination charges from fixed to mobile networks. Moreover, within the year 2002 the completion of the introduction of the new National Numbering Plan took place, which made possible the launch of procedures for providing consumers with new services, such as Carrier Pre-selection. EETT also granted Individual Licences for TETRA Digital Mobile Services, allocated EGSM frequency spectrum and introduced Part Circuits in the Greek market. In the radio spectrum area, investigations for establishing illegal spectrum usage have been intensified, with the aim to protect legitimate users and ensure the availability of frequencies. During the same period, EETT proceeded to the procurement of the necessary equipment, the most notable achievement in this area being the initiation of the procedures for procurement and installation of the National Spectrum Management and Monitoring System.

The work performed in the course of the last two years has served to consolidate the framework necessary for effective market operation, improved quality in the services provided, and balanced and reduced tariffs. These elements have in turn contributed to curbing inflation, boosting entrepreneurship and increasing employment in the sector. It is worth noting that the Consumer Price Index for Communications exhibits a negative trend. Furthermore, convergence of the Greek

and European telecommunications markets is also confirmed by European reports, which acknowledge the progress made and affirm the positive prospects.

The goals of EETT for the future in the telecommunications sector are:

- ▶ To make available to consumers a larger number of enhanced quality services at reasonable prices.
- ▶ To intensify its interventions in order to ensure the development of broadband access to networks and services by end-users.
- ▶ To promote electronic transactions.
- ▶ To develop a modern and efficient mechanism for radio spectrum management and monitoring, mainly in view of the Olympic Games to be held in Greece.

In the sector of postal services, EETT in 2002 continued its activities on the implementation of gradual and controlled liberalisation of the market. EETT concentrated on the control of the quality of the services provided by the sector's undertakings, and the extent to which these undertakings honour their obligations to the consumers. The goal is to prepare the market for the next liberalisation stage, due to take place in 2003, and to establish mechanisms the operation of which will contribute to the effective supervision of the market and to the protection of consumer rights.

In addition, EETT has taken steps to create the necessary mechanisms in order to protect consumers and safeguard their interests. Within this framework, emphasis was given on informing consumers about issues of interest to them, so that they can make the most appropriate and advantageous choices.

Consumers have always been the focal point of all our efforts. Our concern is to respond to the commitment we have undertaken to safeguard the rights of consumers and promote their interests, seeking in parallel to strengthen their position in the market for telecommunications and postal services.

Emmanouil A. Giakoumakis
EETT President

Maroussi, March 2003



Calendar

January

- ▶ Review and provisional approval of the new tariffs of the Hellenic Telecommunications Organisation S.A. (OTE) for Leased Lines.
- ▶ Review of OTE tariffs for basic rate ISDN (Integrated Services Digital Network) access, in terms of their cost-orientation.
- ▶ Granting to "PANAFON - GREEK TELECOMMUNICATIONS", with the distinctive title "PANAFON", of an Individual Licence for Installation, Operation and Exploitation of a Public Wire Telecommunications Network.
- ▶ Determination on the Objection filed by "AUSTROCONSULT TECHNISCHE UND BETRIEBDWIRTSCHAFTLICHE PLANUNG UND BERATUNG Ges.m.b.H" against the result of the evaluation of technical proposals submitted in the framework of the tender procedure conducted for appointment of a project management consultant for Phase A of the National Spectrum Management and Monitoring System (NSMMS).
- ▶ Award of contract under the tender procedure conducted for appointment of a project management consultant for Phase A of the NSMMS.
- ▶ Public Invitation to Tender (Open Procedure) for the appointment of a technical consultant to conduct a study on the determination of the radio spectrum pricing policy.
- ▶ Determination of the time for entry into force of the new OTE tariffs for voice telephony.
- ▶ Conclusion of the project concerning development of the Business Plan of the National Telecommunications & Post Commission (EETT) for its participation in the Operational Programme

"Information Society" (OPIS).

- ▶ Recommendations to the Minister of Transportation & Communications on the limitation and procedure for granting of Individual Licences for the provision of TETRA (TErrestrial Trunked RAdio) Digital Mobile Services in the 410-230 MHz band, and on the limitation and procedure for granting of Individual Licences for the provision of Digital Mobile Services in the 450-470 MHz band.
- ▶ Amendment of EETT Decision 210/10/28-02-2001 concerning approval of the Operational Costing System (OCS) of OTE - Adoption of refinements and/or changes in the OCS.
- ▶ Issue of 2 Decisions on Hearings: COSMOTE was fined for illegal installation of a mobile telephony antenna mast construction, while "A.C.S. - INTERNATIONAL TRANSPORTATIONS AND FACILITIES S.A.", with the distinctive title "A.C.S. S.A.", whose hearing had been held on 27-11-2001, was released from charges.
- ▶ Issue of Decisions assigning 14 frequencies for "Point-to-Point" links, granting 71 Antenna Mast Construction Licences and approving 4 Licences for Private Mobile Radio (PMR) Networks .

February

- ▶ Commencement of Public Consultation procedures on the Introduction of Carrier Pre-selection and Number Portability.
- ▶ Award of contract under the public open tender procedure conducted for appointment of a project management consultant for Phase A of the NSMMS.
- ▶ Adoption of Decision on the Request for Remedy filed on 12-12-2001 by OTE against EETT Decision 229/26/2001 ("Amendment of Presidential Decree 437/1995 on the 'Issue of



- Individual Licence for Installation, Development and Exploitation of Telecommunications Networks and for the Exercise of other Telecommunications Activities by the Hellenic Telecommunications Organisation S.A. [OTE]”) and against any other relevant -prior or subsequent- act or omission by the Administration.
- Supplementary Regulatory Provisions on Universal Service in Telecommunications - Adoption and publication in the Government Gazette.
 - Award of the project to determine the scope of the (main) project “Assessment of competition level and determination of charges for call termination to mobile networks”.
 - Granting to “TOPOS COMMUNICATIONS - TELEMATICS AND INFORMATION TECHNOLOGY S.A.” of a Temporary Licence for Installation and Operation of a TETRA Land Mobile Radio-communications Network, for experimental purposes.
 - Granting to “INTRANET - TELECOMMUNICATIONS SERVICES PROVISION, RESEARCH AND TECHNOLOGY APPLICATION GREEK S.A.”, with the distinctive title “INTRANET S.A.” of an Individual Licence for Installation, Operation and Exploitation of a Public Wire Telecommunications Network and for Provision of Voice Telephony Services.
 - Invitation to Tender (Brief Procedure) for awarding the project “Audit of OTE’s Compliance with the ‘Long-Run Average Incremental Costs (LRAIC)’-based methodology under approval by EETT, including auditing the revaluation of OTE assets, and assessment of the cost-orientation of the Interconnection and Local Loop Unbundling services” - Clarification and entry of the corresponding expenditure item into the budget for financial year 2002.
 - Invitation to Tender (Open Procedure) for awarding the project to conduct a “Study on the Organisation of the Radio Spectrum Department” - Clarification and entry of the corresponding expenditure item into the budget for financial year 2002.
 - Participation in the 2nd East Mediterranean 2002 Strategy Forum on “Information and Communication Technologies”.
 - Issue of 7 Decisions on Hearings: (a) “TNT SKYPACK (HELLAS) LTD” and “KIOULAFIS THEODOSSIOS” were fined (2 Decisions) for breach of terms under the Charter of Obligations to the Consumer and for provision of postal services without General Authorisation or Individual Licence, respectively; (b) “PANAFON” was fined for illegal installation of mobile telephony antenna mast constructions (3 Decisions); (c) “COSMOTE” was fined for illegal installation of a mobile telephony antenna mast construction; and (d) “HELLENIC POST S.A. (ELTA)” was fined for low performance levels in the delivery of incoming foreign Priority Mail. In addition, a recommendation was issued to “3C COM LUXEMBOURG S.A.”.
 - Issue of Decisions assigning 4,996 frequencies for “Point-to-Point” links, granting 126 Antenna Mast Construction Licences and approving 2 Licences for PMR Networks .
- March**
- Review of the request by “PANAFON” and “STET HELLAS - TELECOMMUNICATIONS S.A.” concerning extension of the operation of their existing networks providing Fixed Wireless Access (FWA) services.
 - Approval of the Annual Report for Year 2001 and of the Budget Implementation Tables for Year 2001.



- ▶ Review and rejection of the methodology on Long-Run Average Incremental Costs based on Current Costs for assets (LRAIC-CC), submitted by OTE.
- ▶ Provisional approval of Interconnection charges for call terminations to the OTE network for year 2002.
- ▶ Results of the Public Consultation on "The level of competition in call termination to mobile networks and its impact on the growth of telecommunications and on the cost of the services provided to users."
- ▶ Modification of frequencies in operating licences for PMR Networks, pursuant to Ministerial Decision 8412/305 - "Limitation of the number of Individual Licences for TETRA Public Digital Mobile Services" (FEK Issue 193/B/20-02-2002)".
- ▶ Amendment of EETT Decision 215/31/02-05-2001 ("Regulation on the Management of Short Codes under the National Numbering Plan for Telephony Services and for Mobile and Personal Communications Services"). Publication of the Decision in the Government Gazette (FEK Issue 644/B/28-05-2001).
- ▶ Inclusion of the Short Codes for "COSMOTE S.A.", "OTE", "PANAFON" and "STET HELLAS S.A." in the National Numbering Plan (NNP).
- ▶ Invitation to Tender (Open Procedure) for awarding the project "Specification of the Communication Strategy under the Action Plan and Implementation of Publicity Proposals for the Third Stage in the Introduction of the National Numbering Plan for Telephony Services and Mobile and Personal Communications".
- ▶ Transfer of OTE's FWA Individual Licence at 25 GHz to "COSMOTE S.A."
- ▶ Amendment of EETT Decision 229/26/14-09-2001 ("Amendment of PD 437/1995 'Issue of Individual Licence for Installation, Development and Exploitation of Telecommunications Networks and for the Exercise of other Telecommunications Activities by OTE' ").
- ▶ Granting to "COSMOTE S.A." of an Individual Licence for Installation, Operation and Exploitation of a Public FWA Telecommunications Network and for Provision of Fixed Public Telephony Service.
- ▶ Transfer of the Individual Licence for Installation, Operation and Exploitation of a FWA Public Telecommunications Network and for Provision of Fixed Public Telephony Service to the company resulting from the merger of "QUEST-WIRELESS - TELECOMMUNICATIONS SERVICES S.A.", with the distinctive title "QUEST-WIRELESS S.A.", and "INFO QUEST - COMPUTERS, PERIPHERALS & COMMUNICATIONS S.A.", with the distinctive title "INFO QUEST S.A."
- ▶ Approval of change in ownership and control of "EVERGY - TELECOMMUNICATIONS SERVICES S.A.", with the distinctive title "EVERGY", and of the transfer of the entirety of its share capital to the Dutch company "WIND-PPC HOLDING N.V."
- ▶ Designation of "COSMOTE S.A." and "PANAFON" as Telecommunications Operators with Significant Market Power (SMP Operators) in public mobile telephony networks and public mobile telephony services.
- ▶ EETT announcement concerning the obligations of SMP Operators in public mobile telephony networks and in public mobile telephony services.
- ▶ Announcement of the results of the Public Consultation on Electronic Signature, provision



- of certification services and Voluntary Accreditation.
- ▶ Regulation on the Provision of Electronic Signature Certification Services - Adoption and publication in the Government Gazette.
 - ▶ Granting to “SOUTHGATE COMMUNICATIONS HELLAS - TELECOMMUNICATIONS SERVICES AND INFRASTRUCTURES PROVISION S.A.”, with the distinctive title “SOUTHGATE COMMUNICATIONS HELLAS S.A.”, of an Individual Licence for Provision of Voice Telephony Services.
 - ▶ Regulation on Hearings concerning Telecommunications Issues - Adoption and publication in the Government Gazette.
 - ▶ Drafting and submission to the Ministry of Transportation and Communications of a Draft Ministerial Decision concerning the Regulation on Hearings concerning Postal Issues and of a relevant EETT Opinion.
 - ▶ Establishment of Bodies for Monitoring and Acceptance of the project concerning provision to the EETT of project management consulting services for Phase A of the NSMMS, awarded to the Contractor TELEPLAN S.A.
 - ▶ Invitation to Tender (Open Procedure) for awarding the project to conduct a “Study on the Organisation, Planning and Implementation of Voluntary Accreditation of Certification Service Providers (CSPs) and on other issues pertaining to the Provision of Electronic Signature Certification Services.”
 - ▶ Award of contract under the public open tender procedure for the procurement of equipment for monitoring the SHF band and part of the EHF band.
 - ▶ Invitation to Tender (Open Procedure) for awarding the project to conduct a “Study for the Organisation of the Radio Spectrum Department” - Clarification and entry of the corresponding expenditure item into the budget for financial year 2002.
 - ▶ Participation in the 10th Plenary Meeting of the Independent Regulators Group (IRG).
 - ▶ Issue of 10 Decisions on Hearings: (a) “PANAFON” was fined for illegal installation of mobile telephony antenna mast constructions (4 Decisions); (b) “COSMOTE S.A.” was fined for illegal installation of mobile telephony antenna mast constructions (3 Decisions); and (c) “STET HELLAS S.A.” was fined for illegal installation of a mobile telephony antenna mast construction. “COSMOTE S.A.” was released from charges in one instance (1 Decision). In addition, a recommendation was issued to “PANAFON”.
 - ▶ Issue of Decisions assigning 266 frequencies for “Point-to-Point” links, granting 131 Antenna Mast Construction Licences and approving 4 Licences for PMR Networks .
- April**
- ▶ Approval of the Balance Sheet of 31 December 2001.
 - ▶ Granting of authorisation by the EETT Plenary to its President with regard to the adoption of measures in the framework of radio spectrum monitoring and control - Publication of the Decision in the Government Gazette.
 - ▶ Organisation of a series of Round Table Discussions on critical telecommunications issues.
 - ▶ Approval of the Information Memorandum on the auction for granting TETRA Individual Licences.
 - ▶ Announcement of the results of the Public Consultation held on the introduction of Carrier Pre-selection and Number Portability.
 - ▶ Designation of OTE as SMP Operator in the Market for Leased Lines.



- ▶ Revocation of the General Authorisations (Decisions to Accept Statements of Registration) granted to 4 telecommunications undertakings and deletion thereof from the relevant EETT Registry.
- ▶ Re-tendering of the contract for a technical consultant to conduct a study on the determination of the radio spectrum pricing policy, after the previous tender procedure was declared to be unsuccessful.
- ▶ Approval of the methodology submitted by OTE concerning Long-Run Average Incremental Costs using Current Costs of assets (LRAIC-CC).
- ▶ Award of contract under the brief tender procedure conducted for awarding the project "Audit of OTE's Compliance with the 'Long-Run Average Incremental Costs (LRAIC)'-based methodology approved by EETT, including auditing the revaluation of OTE assets, and assessment of the cost-orientation of the Interconnection and Local Loop Unbundling (LLU) services".
- ▶ Participation in the session of the High-Level Committee of National Telecommunications Administrations and Regulatory Authorities of European Union (EU), member states.
- ▶ Public Consultation on postal issues.
- ▶ Issue of 9 Decisions on Hearings: (a) "METOCHIANAKIS ILIAS", "VERGINA - KISSOUDIS PASCHALIS" and "FLASH RUNNER COURIER DELIVERIES LTD" were fined for provision of postal services without General Authorisation or Individual Licence; (b) "VODAFONE-PANAFON GREEK TELECOMMUNICATIONS S.A.", with the distinctive title "VODAFONE-PANAFON"¹ was fined (2 Decisions), while the antenna mast

construction licence No K-3001/11-06-2001 granted to "COSMOTE S.A." was revoked. In addition, "VODAFONE-PANAFON", "ZACHARNAS IOANNIS" and "KAZANTZI EVANGELIA", were released from charges in connection with the Hearings held on 21-02-2002, 19-03-2002 and 19-03-2002, respectively.

- ▶ Issue of Decisions assigning 262 frequencies for "Point-to-Point" links, granting 118 Antenna Mast Construction Licences and approving 8 Licences for PMR Networks.

May

- ▶ Approval of the Invitation to Tender for the Auction to grant TETRA Individual Licences.
- ▶ Invitation to Tender (Open Procedure) for awarding performance (implementation) of the project of Phase A of the NSMMS.
- ▶ Provisional approval of the prices proposed by OTE for Fully Unbundled and Shared Access to its Local Loop. Publication of the Decision in the Government Gazette.
- ▶ Regulation of issues concerning payment of operating fees for PMR Networks - Publication of the relevant Decision in the Government Gazette.
- ▶ Allocation of EGSM (Extended Global System for Mobile Communications) radio frequency spectrum, by competitive tender, for extending the Licences for 2G Public Mobile Telecommunications Services.
- ▶ Determination on the Objection filed by "PWC CONSULTING S.A. - BUSINESS CONSULTANTS - COMMERCIAL S.A." against the result of the evaluation of technical proposals submitted in the framework of the open tender procedure

¹ "PANAFON - GREEK TELECOMMUNICATIONS S.A." was renamed to "VODAFONE-PANAFON GREEK TELECOMMUNICATIONS S.A." in April, with the distinctive title "VODAFONE-PANAFON".



conducted for appointment of a technical consultant to conduct a study on the determination of the radio spectrum pricing policy and the declaration of the said tender procedure to be unsuccessful.

- Determination on the Objection filed by the Association of “AEGIS SYSTEMS Ltd” and “INDEPEN CONSULTING Ltd” against: (a) EETT Decision 251/80/22-04-2002 concerning the evaluation of the technical proposals submitted in the framework of the open tender procedure conducted for appointment of a technical consultant to conduct a study on the determination of the radio spectrum pricing policy and the declaration of the said tender procedure to be unsuccessful; and (b) the relevant Recommendation 1713/F.600/22-04-2002 (in the place of Minutes) by the Tender Procedure Committee for the said tender, which was appointed by EETT Decision 242/24/14-01-2002.
- Rejection of the Application by “INTRA CONNECT - COMMERCIAL AND TELECOMMUNICATIONS SERVICES PROVISION S.A.”, with the distinctive title “INTRACONNECT S.A.”, concerning Modification of the Individual Licence for Installation, Operation and Exploitation of a Public Wireless Microwave Backbone Telecommunications Network and for Provision of Services.
- Granting to “EXONET COMMUNICATIONS S.A.”, with the distinctive title “EXONET S.A.” of an Individual Licence for the Provision of Voice Telephony Services.
- Regulation on the Introduction of Carrier Pre-selection in the Greek Market - Adoption and publication in the Government Gazette.
- Regulation on the Introduction of Number

Portability in the Greek Market - Adoption and publication in the Government Gazette.

- Regulation on the Assignment of Individual Radio Frequencies for Private Wireless Links - Adoption and publication in the Government Gazette.
- Signature of Memorandum of Understanding (MoU) between IRG members, during the Group’s last session (Paris, 23 to 25-05-2002) - Ratification of the MoU.
- Participation in the IRG10th Plenary Meeting.
- Issue of 6 Decisions on Hearings: (a) “COSMOTE S.A.” was fined for illegal installation of a mobile telephony antenna mast construction; (b) “STET HELLAS S.A.” was fined for illegal installation of a mobile telephony antenna mast construction; and (c) “L. ARMAOS - I. FYRIGOS LTD” was fined for provision of postal services without General Authorisation or Individual Licence. In addition, “LYMPERIADIS PETROS”, OTE and “COSMOTE S.A.”, were released from charges in connection with the Hearings held on 15-04-2002, 06-03-2002 and 12-03-2002, respectively.

June

- Regulation determining the Content of US - Adoption and publication in the Government Gazette.
- Regulation of issues relating to the provision of Leased Lines - Publication of the Decision in the Government Gazette.
- Adoption of Decision on the breaking away of OTE’s Telephone Directory branch and on its integration in OTE’s subsidiary Company “OTE DIRECTORY INFORMATION”, with the distinctive title “INFOTE”.



- ▶ Approval of the Invitation to Tender for the auction to assign EGSM radio spectrum bandwidth for the provision of 2G Public Mobile Telecommunications Services - Establishment of Working Group and assignment to it of the task of conducting the aforementioned auction.
 - ▶ Determination on the Objections filed by OTE and by "LANTEC COMMUNICATIONS S.A." concerning the brief tender procedure conducted for the supply of a telephone switchboard for EETT.
 - ▶ Amendment of EETT Decision 248/58/15-03-2002 ("Inclusion of OTE Short Codes in the National Numbering Plan").
 - ▶ Commencement of the Public Consultation process on assigning and managing [.gr] Domain Names.
 - ▶ Approval of the list of candidates selected to participate in the auction for granting TETRA Individual Licences - Deferral of auction date.
 - ▶ Award of contract under the open tender procedure conducted for awarding implementation of the project: "Specification of the Communication Strategy under the Action Plan and Implementation of Publicity Proposals for the Third Stage in the Introduction of the National Numbering Plan for Telephony Services and Mobile and Personal Communications".
 - ▶ Organisation of a training seminar on "Market Definition and Significant Market Power in Telecommunications", for EETT staff.
 - ▶ Approval of change in the control of "SOUTHGATE COMMUNICATIONS HELLAS S.A."
 - ▶ Re-tendering of the contract for conducting a "Study on the Organisation, Planning and Implementation of Voluntary Accreditation of CSPs and on other issues pertaining to the Provision of Electronic Signature Certification Services", after the previous tender procedure was declared to be unsuccessful.
 - ▶ Participation in the 2nd Regional Symposium of Southeast Europe Telecommunications Regulators.
 - ▶ Issue of 11 Decisions on Hearings: (a) "COSMOTE S.A." was fined for illegal installation of mobile telephony antenna mast constructions (3 Decisions); (b) "VODAFONE-PANAFON" was fined for illegal installation of mobile telephony antenna mast constructions; (c) "STET HELLAS S.A." was fined for illegal installation of a mobile telephony antenna mast construction; and (d) "DORDIOU DESPINA" was fined for provision of postal services without General Authorisation or Individual Licence. In addition, "STET HELLAS S.A.", "MAZNIS GRIGORIOS", "TYROS CONSTANTINOS" and "CALLERGIS CONSTANTINOS" were released from charges in one instance each, while a Recommendation was issued to "TRIANTA-FYLLIDIS ANESTIS - GRAND EXPRESS".
 - ▶ Issue of Decisions assigning 468 frequencies for "Point-to-Point" links, granting 156 Antenna Mast Construction Licences and approving 4 Licences for PMR Networks.
- July**
- ▶ Auction held for granting TETRA Individual Licences.
 - ▶ Provisional approval of the tariffs submitted by OTE for basic rate ISDN access.
 - ▶ Assignment to a Working Group of the task of developing the Body of the Business Plan for EETT to meet the requirements of the Olympic Games.
 - ▶ Granting to OTE of an Individual Licence for Installation, Operation and Exploitation of a



Public Telecommunications Network for TETRA Mobile Communications and for Provision of TETRA Public Digital Mobile Services.

- ▶ Amendment of EETT Decision 240/4/28-12-2002 ("Granting to 'ATTIC TELECOMMUNICATIONS - TELECOMMUNICATIONS SERVICES S.A.', with the distinctive title 'ATTIC TELECOMMUNICATIONS S.A.', of an Individual Licence for Installation, Operation and Exploitation of a Public Wire Telecommunications Network").
- ▶ Submission of Opinion to the Minister of Transportation and Communications concerning the Modification of the National Frequencies Allocation Table (NFAT).
- ▶ Determination on the Objection filed by "ENCODE - INDUSTRIAL AND COMMERCIAL S.A. FOR INFORMATION SYSTEMS SECURITY PRODUCTS AND SERVICES" against EETT Decision 256/119/27-06-2002 ("Results of the open tender procedure conducted for awarding the 'Study on the Organisation, Planning and Implementation of Voluntary Accreditation of Certification Service Providers (CSPs) and on other issues pertaining to the Provision of Electronic Signature Certification Services' - Declaration of the said tender procedure to be unsuccessful").
- ▶ Determination of the Objection filed by the association of undertakings "DELOITTE & TOUCHE S.A." and "DELOITTE & TOUCHE LLP" against EETT Decision 256/119/27-06-2002 ("Results of the open tender procedure conducted for awarding the 'Study on the Organisation, Planning and Implementation of Voluntary Accreditation of Certification Service Providers (CSPs) and on other issues pertaining to the Provision of Electronic Signature Certification Services' - Declaration of the said tender procedure to be unsuccessful").
- ▶ Award of the re-tendered contract for a technical consultant to conduct a study on the determination of the radio spectrum pricing policy, after the previous tender procedure was declared to be unsuccessful.
- ▶ Revocation of the General Authorisations (Decisions to Accept Statements of Registration) granted to 4 telecommunications undertakings and deletion thereof from the relevant EETT Registry.
- ▶ Approval of the list of candidates selected to participate in the auction for allocation of EGSM radio spectrum bandwidth.
- ▶ Granting to "ACN - ALTEC COMMUNICATIONS NETWORKS S.A.", with the distinctive title "CAN S.A.", of an Individual Licence for Provision of Voice Telephony Services.
- ▶ Amendment of EETT Decision 227/72/29-08-2001 ("Granting to 'VIVODI TELECOMMUNICATIONS - TELECOMMUNICATIONS INFRASTRUCTURES & SERVICES S.A.', with the distinctive title 'VIVODI TELECOMMUNICATIONS S.A.', of an Individual Licence for Provision of Voice Telephony Services and for the Installation, Operation and Exploitation of a Public Wireless Microwave Backbone Telecommunications Network").
- ▶ Rejection of the application by "IPNG GROUP COMMERCIAL S.A. FOR TELECOMMUNICATIONS SYSTEMS AND INTERNET SYSTEMS AND INFORMATION TECHNOLOGY SYSTEMS", with the distinctive title "IPNG GROUP S.A." concerning granting of an Individual Licence for Installation and Operation of a Standalone Fixed Radiocommunications Station.
- ▶ Approval of the notified change in the control of "MEDITERRANEAN NAUTILUS - TELECOMMUNICATIONS SERVICES PROVISION S.A.", with the distinctive title "MEDITERRANEAN NAUTILUS



GREECE S.A.", holder of an Individual Licence for Installation, Operation and Exploitation of a Public Wire Telecommunications Network.

- ▶ Award of contract under the open tender procedure conducted for awarding the project to conduct the "Study on the Organisation of the Radio Spectrum Department".
- ▶ Deletion from the National Radio Frequencies Registry of all radio frequency links assigned within frequency bands intended or assigned exclusively for provision of TETRA, GSM (Global System for Mobile Communications), EGSM, DCS 1800 (Digital Command Signal) and UMTS (Universal Mobile Telecommunications Systems) mobile and personal communication services, and for development of FWA networks. Adoption of the relevant Act and publication thereof in the Government Gazette.
- ▶ Auction held to allocate EGSM radio spectrum bandwidth for the provision of 2G Public Mobile Telecommunications Services.
- ▶ Amendment of the Individual Licence, granted by EETT Decision 203/07/10-01-2001 to "UNITEL HELLAS - COMMERCIAL & INDUSTRIAL S.A. FOR ADVANCED TECHNOLOGY AND INFORMATION TECHNOLOGY SYSTEMS", under the distinctive title "UNITEL HELLAS S.A.", for Installation, Operation, Management and Exploitation of a Satellite Network and for Provision of Satellite Communications Services, as granted by EETT.
- ▶ Amendment of the Individual Licence, granted by EETT Decision 202/03/03-01-2001 to "COMMERCIAL COMMUNICATION NETWORKS S.A.", under the distinctive title "COM-TO NET S.A.", for Installation, Operation, Management and Exploitation of a Satellite Network and for Provision of Satellite Communications Services.
- ▶ Revocation of the General Authorisations (Decisions to Accept Statements of Registration)

granted to 5 telecommunications undertakings and deletion thereof from the relevant EETT Registry.

- ▶ Issue of 10 Decisions on Hearings: (a) "VOVOS THEODOROS" and "THEOFILOU ZOI" were fined for provision of postal services without General Authorisation or Individual Licence; (b) "STET HELLAS S.A." was fined for illegal installation of mobile telephony antenna mast constructions (2 Decisions); and (c) "VODAFONE-PANAFON" was fined for illegal installation of a mobile telephony antenna mast construction. "KOTSOKOLOS PANAGIOTIS" was released from charges (1 Decision). Recommendations were issued to "ZACHARIOU MARIA", OTE and ELTA, while a deadline was set for relocation of an OTE mobile antenna mast construction.
- ▶ Issue of Decisions assigning 336 frequencies for "Point-to-Point" links, granting 122 Antenna Mast Construction Licences and approving 26 Licences for PMR Networks.

August

- ▶ Amendment of EETT Decision 208/2/09-10-2001 ("Granting to 'INTRA CONNECT - COMMERCIAL AND TELECOMMUNICATIONS SERVICES PROVISION S.A.', with the distinctive title 'INTRACONNECT S.A.', of an Individual Licence for Installation, Operation and Exploitation of a Public Wireless Microwave Backbone Telecommunications Network and for Provision of Services").
- ▶ Amendment of EETT Decision 217/28/18-05-2001 ("Granting to 'TELEDOME -TELECOMMUNICATIONS, INFORMATION TECHNOLOGY AND TELEMATICS SYSTEMS - COMMERCIAL AND INDUSTRIAL S.A.', with the distinctive title 'TELEDOME S.A.', of an Individual Licence for the Provision of Voice Telephony Services").
- ▶ Assignment of EGSM radio spectrum bandwidth



to "COSMOTE S.A.", by Amendment of EETT Decision 240/1/28-12-2001 (FEK Issue 142/B/12-02-2002) - "Amendment of PD 437/1995 on 'Issue of Individual Licence for Installation, Development and Exploitation of Telecommunications Networks and for the Exercise of other Telecommunications Activities by OTE (FEK Issue 250/A/1995), to the extent concerning the Individual Licence for Provision of Personal Communications Services through the Personal Communications Network based on DCS Technology which was transferred to "COSMOTE S.A.", by article 15 of Law 2465/1997".

- ▶ Approval (with modifications) of OTE's Reference Interconnection Offer (RIO) for Year 2002 - Publication of the RIO in the Government Gazette.
- ▶ Regulation on US Costing and Pricing Principles - Adoption and publication in the Government Gazette.
- ▶ Revocation of the Individual Licence granted to "INTRANET S.A." and deletion thereof from the relevant EETT Registry.
- ▶ Invitation to Tender (Open Procedure) for appointment of a Contractor to conduct the Study "Fixed-to-Mobile call termination: Market definition - Level of competition - Regulation of termination charges".
- ▶ Issue of 6 Decisions on Hearings: (a) "COSMOTE S.A." was fined for illegal installation of mobile telephony antenna mast constructions (3 Decisions); (b) "STET HELLAS S.A." was fined for illegal installation of a mobile telephony antenna mast construction; (c) ELTA was fined for deficient provision of Universal Service postal services; and (d) "ABARTSIDIS ALEXANDROS" was fined for provision of postal services without General Authorisation or Individual Licence. In addition, "STET HELLAS S.A." was released from charges of illegal installation of a mobile

telephony antenna mast construction in one instance (1 Decision).

- ▶ Issue of Decisions assigning 28 frequencies for "Point-to-Point" links, granting 92 Antenna Mast Construction Licences and approving 2 Licences for PMR Networks.

September

- ▶ Announcement of results of the Public Consultation held on assigning and managing [.gr] Domain Names.
- ▶ Allocation to "SOUTHGATE COMMUNICATIONS HELLAS S.A." of a number in the "0807" Series under the NNP.
- ▶ Allocation to "SOUTHGATE COMMUNICATIONS HELLAS S.A." of a Short Network Code under the NNP.
- ▶ Adoption of special measures for protecting Monitoring Stations of the NSMMS against harmful interference - Publication of the Decision in the Government Gazette.
- ▶ Award of contract under the brief tender procedure conducted for awarding the project to conduct a "Study on the Specification of the Integrated Information System (IIS) of EETT".
- ▶ Decision on the breaking away of the OTE Real Estate branch and on its integration in OTE's subsidiary Company "OTE REAL ESTATE S.A.", with the distinctive title "OTE-ESTATE S.A.".
- ▶ Certification to the respective revenue office of the minimum fees due by postal undertakings for year 2001.
- ▶ Participation in the IRG11th Plenary Meeting.
- ▶ Issue of 10 Decisions on Hearings: (a) "STET HELLAS S.A." was fined for illegal installation of mobile telephony antenna mast constructions (2 Decisions); (b) "COSMOTE S.A." was fined for illegal installation of mobile telephony antenna



mast constructions (2 Decisions); and (c) "VODAFONE-PANAFON" was fined for illegal installation of mobile telephony antenna mast constructions (6 Decisions).

- ▶ Issue of Decisions assigning 540 frequencies for "Point-to-Point" links, granting 130 Antenna Mast Construction Licences and approving 12 Licences for PMR Networks.

October

- ▶ Designation of Parties under Obligation to provide US - Publication of the Decision in the Government Gazette.
- ▶ Commencement of Public Consultation procedures in view of the preparation of RIO 2003.
- ▶ Award of contract, by brief tender procedure, for building the "Bottom-Up" Model for Interconnection and LLU.
- ▶ Designation of the numbers in the "696" series under the NNP as henceforth used for numbering Public TETRA (TERrestrial Trunked RAdio) Digital Mobile Radiocommunication Networks.
- ▶ Revocation of the General Authorisations (Decisions to Accept Statements of Registration) granted to 4 telecommunications undertakings and deletion thereof from the relevant EETT Registry.
- ▶ Implementation of the Training Programme of EETT.
- ▶ Issue of 10 Decisions on Hearings: (a) "VODAFONE-PANAFON" was fined for illegal installation of mobile telephony antenna mast constructions (2 Decisions); (b) "COSMOTE S.A." was fined for illegal installation of mobile telephony antenna mast constructions (3 Decisions); (c) "STET HELLAS S.A." was fined for illegal installation of a mobile telephony antenna mast

construction; (d) "POLYZOPOULOS APOSTOLOS" was fined for provision of postal services without General Authorisation or Individual Licence; and (e) OTE was fined, following complaints by "GREEK TELECOMMUNICATIONS AND TELEMATIC APPLICATIONS S.A.", with the distinctive title "FORTHNET S.A.", for breaching the legislation in force on telecommunications and competition. In addition, "MORFIS SOTIRIOS" and "CHARIZANIS PETROS" were released from charges (2 Decisions).

- ▶ Issue of Decisions granting 187 Antenna Mast Construction Licences and approving 20 Licences for PMR Networks .

November

- ▶ Regulations concerning Short Codes under the NNP. Publication of the Decision in the Government Gazette.
- ▶ Regulation on the Determination of Spectrum Usage Fees and of Radio Frequency Assignment Fees for Private Use, and Regulation of Issues regarding Payment of Radio Spectrum Usage Fees - Adoption and publication in the Government Gazette.
- ▶ Modification of OTE's Operational Costing System (OCS) based on the LRAIC-CC standard (methodology).
- ▶ Publication of EETT Announcement regarding OTE's Compliance with the costing system approved by EETT for the voice telephony services provided.
- ▶ Approval of the, notified to EETT, change in the control of "TELESPAZIO S.p.A.", and of the transfer of all its shares to "FINMECCANICA S.p.A."
- ▶ Determination on the Objections filed by "INTRACOM S.A. GREEK TELECOMMUNICATIONS AND INFORMATION TECHNOLOGY SYSTEMS S.A.", by the Association of Undertakings "TCI



- INTERNATIONAL Inc.” and “SPACE HELLAS - TRADING - AGENCIES - IMPORTS - EXPORTS S.A.”, and by the Association of Undertakings “THALES SERVICES HELLAS - ELECTRONIC SERVICES PROVISION S.A.” and “THALES COMMUNICATIONS S.A.”, against the result of the evaluation of the technical proposals submitted in the framework of the open tender procedure conducted for awarding performance (implementation) of Phase A of the NSMMS.
- ▶ Approval of the standardised application form submitted by OTE for use by subscribers applying for Carrier Pre-selection.
 - ▶ Determination of the Short Code “1111” under the NNP for provision, by the Party under obligation to provide US, of information free-of-charge to the blind and to persons with serious sight impairments on the amount of the last bill, as this derives from article 6. paragraph 8 of EETT Decision 255/83/14-06-2002 (Determination of US Content”). Publication of the Decision in the Government Gazette.
 - ▶ Granting to “FORTHNET S.A.” of an Individual Licence for Installation, Operation and Exploitation of a Public Wireless Microwave Backbone Telecommunications Network.
 - ▶ Extension of the deadline for fulfilment of the minimum obligations for deployment of the FWA network of “EUROPROM”, as results from the Company’s Licence.
 - ▶ Extension of the deadline for fulfilment of the minimum obligations for deployment of the FWA network of “INFO QUEST S.A.”, as results from the Company’s Licence.
 - ▶ Extension of the deadline for fulfilment of the minimum obligations for deployment of the FWA network of “EVERGY”, as results from the Company’s Licence.
 - ▶ Adoption of interim measures with regard to the dispute between “TELEDOME S.A.” and OTE - Recommendation on summoning OTE to a Hearing.
 - ▶ Publication of an information leaflet addressed to the general public, titled “Our Rights. A New Era in Telecommunications”.
 - ▶ Award of contract under the open tender procedure conducted for awarding the project of Phase A of the NSMMS.
 - ▶ Issue of a Certificate of Compliance concerning OTE’s costing system for Interconnection services - Approval and Publication in the Government Gazette.
 - ▶ Granting to “INTEL-NET S.A.”, with the distinctive title “INTELCO S.A.”, of an Individual Licence for Installation, Operation and Exploitation of a Satellite Network and for Provision of Satellite Communications Services.
 - ▶ Regulation on Assigning and Managing [.gr] Domain Names - Adoption and publication in the Government Gazette.
 - ▶ Introduction of Part Circuits in the Greek market - Publication of the Decision in the Government Gazette.
 - ▶ Invitation to Tender (Open Procedure) for appointment of a Contractor to undertake the Project of Procurement, Installation, Operation and administration of the National Reference Database on Number Portability (NRD-NP).
 - ▶ Issue of 13 Decisions on Hearings: (a) “VODAFONE-PANAFON” was fined for illegal installation of mobile telephony antenna mast constructions (2 Decisions); (b) “COSMOTE S.A.” was fined for illegal installation of a mobile telephony antenna mast construction; (c) “ACES COURIERS - LOGISTIC SERVICES - OPERATIONAL SERVICES S.A.” was fined for deficient provision of postal services; and (d)



“SPEEDEX - COURIER SERVICES S.A.” was fined for breach of the Charter of Obligations to the Consumer. In addition, “PCS COURIER”, “STET HELLAS S.A.”, ELTA, and “LAN-NET S.A.” were released from charges (4 Decisions). Furthermore, Recommendations were issued to “SPEEDEX COURIER SERVICES S.A.”, “MEDITERRANEAN BROADBAND SERVICES - TELECOMMUNICATIONS S.A.”, “UNITEL HELLAS S.A.”, and OTE.

- ▶ Issue of Decisions assigning 915 frequencies for “Point-to-Point” links, granting 176 Antenna Mast Construction Licences and approving 7 Licences for PMR Networks.

December

- ▶ Approval of Attachment to OTE’s 2002 RIO regarding provision of Carrier Pre-selection - Publication of the Decision in the Government Gazette.
- ▶ Revocation of EETT Decision 254/66/31-05-2002 (“Granting to ‘EXONET COMMUNICATIONS S.A.’, with the distinctive title ‘EXONET S.A.’, of an Individual Licence for Provision of Voice Telephony Services”).
- ▶ OTE Offer for Provision of Pre-agreed SLA Leased Line Services - Approval and publication in the Government Gazette.
- ▶ Determination of the Objection filed by the association of undertakings “DELOITTE & TOUCHE S.A.” and “DELOITTE & TOUCHE LLP” against the tender procedure conducted for awarding the “Study on the Organisation, Planning and Implementation of Voluntary Accreditation of Certification Service Providers (CSPs) and on other issues pertaining to the Provision of Electronic Signature Certification Services”.
- ▶ Public Consultation on the selection of the Parties under Obligation to provide US and of mechanisms for sharing US costs.
- ▶ Award of the re-tendered contract for awarding a project to conduct the “Study on the Organisation, Planning and Implementation of Voluntary Accreditation of Certification Service Providers (CSPs) and on other issues pertaining to the Provision of Electronic Signature Certification Services”.
- ▶ Adoption of Decision on the transfer of equipment regarding the FWA Individual Licence at 25 GHz from OTE to “COSMOTE S.A.”.
- ▶ Examination of the Requests for Interim Measures filed by “LAN-NET S.A.”, “ALGONET S.A.”, “TELEDOME S.A.”, and “FORTHNET S.A.” against OTE with regard to its Festive Season offer - Adoption of interim measures with regard to OTE’s Festive Season offer - Summons of OTE to a Hearing.
- ▶ Adoption of Decision on the Request for Remedy by OTE against EETT Decision 261/142/28-08-2002.
- ▶ Organisation in Athens of the 50th Session of the Electronic Communication Committee Project Team on Numbering (ECC - PT3).
- ▶ Granting to “COSMOTE S.A.” of an Individual Licence for Provision of Public Wireless Local Area Network (W-LAN) Mobile Telecommunications Services.
- ▶ Granting to “GREEK S.A. FOR PROVISION OF INTERNET PRODUCTS AND SERVICES”, with the distinctive title “OTENET S.A.”, of an Individual Licence for Provision of W-LAN Services.
- ▶ Approval of the EETT budget for year 2003.
- ▶ Renting, free from payment of rental, of premises in the State Airport of Thessaloniki from the Ministry of Transportation and Communications, to be used for establishing the Regional Radio Spectrum Monitoring Office of EETT in Thessaloniki.



- ▶ Audit of OTE's tariffs for the provision of Leased Lines.
- ▶ Adoption of interim measures with regard to the dispute between "TELEDOME S.A." and OTE - Summons of OTE to a Hearing.
- ▶ Adoption of Decision on the Request for Interim Measures - complaint filed by "FORTHNET S.A." against OTE, with regard to OTE's refusal to activate a wireless link in the framework of Interconnection and LLU - Summons of OTE to a Hearing.
- ▶ Issue of 14 Decisions on Hearings: (a) OTE was fined for failure to provide data for establishing the cost-orientation of the tariffs for Leased Lines; (b) "STET HELLAS S.A." was fined (4 Decisions) for illegal installation of mobile telephony antenna mast constructions; (c) "VODAFONE-PANAFON" was fined (4 Decisions) for illegal installation of mobile telephony antenna mast constructions; (d) "COSMOTE S.A." was fined for illegal installation of a mobile telephony antenna mast construction; and (d) "DORLI EVGENIA" was fined for provision of postal services without General Authorisation or Individual Licence. In addition, "MEDITERRANEAN NAUTILUS GREECE S.A.", "VODAFONE-PANAFON" and "A.C.S. S.A." were released from charges in four instances (4 Decisions).
- ▶ Issue of Decisions assigning 368 frequencies for "Point-to-Point" links and granting 96 Antenna Mast Construction Licences.

Telecommunications Sector





A. Telecommunications Sector

1. General Overview of the Sector

1.1. Introduction

Just before the transition to a new Regulatory Framework which is addressed to markets that are already liberalised and introduces convergence in the electronic communications sector, according to which all transmission networks and services should be governed by a single Regulatory Framework, 2002 was a year during which the existing Regulatory Framework was completed and clarified, complemented by monitoring and improvement actions regarding its application.

The chapters that follow present the key features of the new Regulatory Framework, which is to succeed the existing one, together with a first assessment regarding impending changes. Under the new Framework, enforcement of regulatory obligations is connected to the lack of effective competition in the corresponding markets, under the rationale that, in a liberalised market, interventions should be decreasing over time. This approach is based on the principle that, within increasingly more competitive and technologically converging markets, National Regulatory Authorities (NRAs) should be able to assess the level of competition and implement regulatory obligations in advance only in cases where competition is not effective. In this framework, as noted by the European Commission in its 8th Report, NRAs are called upon to clearly play a major role in the new regulatory regime. NRAs will in particular have to assess the degree of effective competition in relevant markets, and decide the regulatory obligations to be enforced on players with Significant Market Power (SMP).

However, as pointed out by the European Commission in its 8th Report, "Successful transition to the new

framework depends on the full implementation of the current framework, including universal service and consumer protection measures." This is particularly true in the case of the Greek telecommunications market, where full liberalisation was introduced by Law 2867/2000 only in late 2000, that is to say with a delay of two years compared to other member states, and, consequently, the requirements for regulatory interventions to implement liberalisation quickly and to secure conditions of effective competition in practice acquired an imperative character.

Thus, the work accomplished by EETT during 2002 must be viewed and assessed in the light of the above remarks, in terms of ex ante regulatory interventions, through the institution of measures necessary for the operation of the liberalised market, but also in terms of ex post interventions aimed at ensuring conditions of fair competition and to correct behaviours deviating from those appropriate under free competition.

The presentation that follows demonstrates that, during 2002, the efforts made by EETT to consolidate competition and ensure a healthy framework for the development of the telecommunications market, while at the same time protecting the rights of telecommunications services consumers, made a significant contribution to maximising benefits for consumers and for the national economy in general.

In this framework, EETT interventions in the telecommunications sector, during 2002, were of a regulatory, monitoring and suppressive nature. To a large extent, the regulatory work of EETT during 2002 was the continuation and completion of actions and interventions which had already been initiated in 2001, but whose implementation and results materialised during the past year. In parallel by completing the range of measures necessary for the implementation of the existing Regulatory

Framework, EETT paved the way for the implementation of the forthcoming framework in full compliance with the provisions of Community Directives.

The following is an indicative list of the areas on which the most important regulatory interventions by EETT focused during 2002:

- ▶ Access (Interconnection, Local Loop Unbundling-LLU, Leased Lines).
- ▶ Internet, Domain Names and Electronic Signature. Specifically, the conditions and procedures for assigning [.gr] Domain Names were determined, and issues related to the provision of Electronic Signature certification services were regulated.
- ▶ Universal Service - US (Designation of the Operator under obligation to provide the service, and determination of its contents and costing principles).
- ▶ Numbering (Determination of the procedures concerning provision of Carrier Pre-selection and Number Portability services).
- ▶ Assignment of Individual Radio Frequencies for private use, and specification of the relevant procedures.

Moreover, the most important Decisions adopted by EETT in 2002 included decisions designating Telecommunications Operators with SMP for the provision of Leased Lines, as well as corresponding decisions for the markets of public networks and mobile telephony services.

The overview of the sector is not exhausted with the description of the existing and forthcoming regulatory framework and of the key EETT Regulatory Acts regarding its implementation, but is coupled with the presentation of detailed data that demonstrate the impact of the above-mentioned regulatory interventions on the market, at the level of both providers and consumers of telecommunications services. This is so because the aim of all these efforts was to establish the smooth operation of the market to the benefit of consumers, especially by ensuring the existence of adequate options for

serving consumer needs in terms of both quality and pricing. A key precondition for achieving this aim is to secure that consumers are adequately and reliably informed and are provided with all the data which allow them to exercise in full the right of choice being offered to them.

The efforts to establish the (regulatory) preconditions to allow spreading of broadband access by Greek users to electronic communications networks and services should also be viewed in this framework. A number of additional interventions (W-LAN licensing, Part Circuits, audit of cost-orientation of prices for LLU.) created the conditions for provision of broadband services, with a significant increase expected in broadband access levels in Greece during 2003.

The quantitative data from the market overview, which are presented in the following sections, confirm the positive results of EETT interventions in the individual areas. The marked increase in the options available to a significant part of the Greek population regarding selection of an operator to handle their local/ national/ international calls, is indicative of this. In addition, the mobile telephony market in Greece appears particularly robust and dynamic, with penetration rates exceeding the European average. It should be noted that in September 2002 a fourth mobile telephony company started operating in Greece. It is estimated that during the first three quarters of 2002 the turnover of telecommunication services providers in Greece increased by more than 10% compared to the first three quarters of 2001, with the forecasted Gross Domestic Product (GDP) growth rate for the same period standing at 4%.

To confirm the above, the European Commission acknowledged the positive results of EETT interventions, a fact that encourages and strengthens EETT's future efforts and the soundness of its activities. As mentioned in the 8th Report of the European Commission² on telecommunications, there was a marked improvement in the performance of EETT with regard to the exercise

² Eighth Report from the Commission on the Implementation of the Telecommunications Regulatory Package, COM (2002) 695 Final.



of its regulatory role, as well as increased transparency in its decision-making procedures. The Report characteristically states that “the overall performance of the independent body may quite simply be improved through the transfer of all regulatory powers from the Ministry, as has been the case for example in Greece.” Moreover, regarding the adoption by EETT of the new Regulation on Hearings concerning Telecommunications Issues, the Commission considers that, by providing for its power to adopt effective interim measures for regulating a particular situation, EETT is expected to respond to relevant concerns voiced by market players.

Positive comments were also expressed concerning EETT activities in the area of radio frequency management, for which the Commission characteristically reports that, following the transfer to EETT in 2001 of the authority to allocate radio frequencies, the problems which had occurred in the past in connection with the assignment of radio frequency spectrum were overcome, while in parallel the times required to process applications for assignment of radio frequencies were significantly improved.

1.2. Legislative Framework 2002

The legislative framework in force, which regulates the telecommunications sector comprises Law 2867/2000³, as further specified and implemented through a series of EETT Decisions, and a number of Presidential Decrees (PDs) that have remained in force after the aforementioned Law was ratified. This Law is, in effect, a “Framework Law”, which marked the conclusion of the liberalisation of the telecommunications sector in Greece as of 31 December 2000, laying the foundations necessary for introduction

and consolidation of competition in the Greek telecommunications market and establishing the role of EETT as the NRA responsible for telecommunications issues.

The above-mentioned Law follows the dictates of the 1998 Community Regulatory Framework, and is supplemented by a number of PDs, which regulate, among other things, issues concerning Leased Lines, Interconnection and US. These PDs were issued for the purposes of harmonisation with the corresponding Community Directives⁴, and remained in force after publication of Law 2867/2000. The regulatory framework for telecommunications is completed by Regulation 2887/2000 laying down the terms for provision of LLU, and its application was further specified and implemented through EETT Decisions.

Moreover, concerning the new regulatory legislation introduced in 2002, it should be mentioned that Law 3082/2002⁵ supplements article 12 of Law 2867/2000 to afford EETT the power to adopt interim measures in cases where violation of the provisions of Law 2867/2000 or of the relevant secondary legislation is thought likely and in order to avert potential risk or irreparable damage to the claimant or to the public interest. In parallel, PD 388/2002⁶ introduced provisions regarding the organisation of Standing EETT Arbitration and determined the disputes that may be referred to this arbitration. The aim is to establish an arbitration mechanism for resolving disputes which arise between telecommunications undertakings or between such undertakings and the State or users / private individuals and concern the application of the legislation on telecommunications or of competition rules. The possibility offered to resolve disputes through this mechanism is expected to have a significant impact,

³ FEK Issue 278/A/19-12-2000.

⁴ These are primarily the following: PD 156/1999 (FEK Issue 153/A/29-07-1999), on the Amendment of PD 40/1996 in compliance with Directive 1997/51/EC of the European Parliament and of the Council amending Council Directives 1990/387/EEC and 1992/44/EEC for the purposes of adaptation to a competitive environment in telecommunications; PD 165/1999 (FEK Issue 159/A/04-08-1999), in harmonisation with Directive 1997/33/EC; and PD 181/1999 (FEK Issue 170/A/20-08-1999), in harmonisation with Directive 1998/10/EC.

⁵ FEK Issue 316/A/16-12-2002.

⁶ PD 388/2002 “Determination of the disputes that may be referred to the National Telecommunications and Post Commission’s Standing Arbitration, and organisation of such arbitration”, FEK Issue 335/A/31-12-2002.

given the increased specialisation of the arbitration body and its capability to apply more flexible procedures.

In the area of the radio frequency spectrum, the main legislative act is Law 2801/2000⁷, as well as PD 44/2002 on Radio Equipment and Telecommunications Terminal Equipment (RE-TTE) and the mutual recognition of the conformity of such equipment, by which the Greek law was harmonised with the provisions of Directive 1999/5/EC⁸.

During 2002 EETT exercised its regulatory competence by issuing a large number of Regulatory Acts on sector issues, especially in relation to Interconnection, LLU, provision of Leased Lines, Numbering and other Open Network Provision (ONP) issues, US and users' rights, Internet issues, Domain Names, Electronic Signature, the Hearings procedure and the procedures for adoption of interim measures, as well as issues relating to operation/management and monitoring of the radio frequency spectrum.

Prior to presenting the key Regulatory Acts issued by EETT in 2002, it is worth pointing out that the European Commission, in its 8th Report, and in reviewing the implementation of the current Regulatory Framework in member states, formulated the key principle that "Successful transition to the new framework depends on the full implementation of the current framework, including US and consumer protection measures".

Designation of Telecommunications Operators with Significant Market Power (SMP) in the Provision of Leased Lines⁹

EETT designated OTE as SMP Operator in the market for the provision of Leased Lines, specifying that OTE

should fulfil all relevant obligations as these are provided for by the applicable national and European legislation.

Designation of Telecommunications Operators with Significant Market Power in the Market of Mobile Telephony Networks and Public Mobile Telephony Services¹⁰

By virtue of this Decision, EETT designated COSMOTE S.A. and VODAFONE-PANAFON as SMP Operators in the market for Mobile Telephony Networks and Public Mobile Telephony Services, specifying that they should fulfil all relevant obligations as these are provided for by the applicable national and European legislation.

Access Issues (Interconnection, Local Loop Unbundling, Leased Lines, Numbering)

Regulation of Matters concerning Provision of Leased Lines¹¹

By virtue of this Decision, EETT regulated matters concerning the provision of Leased Lines, in the framework of the obligations undertaken by SMP Operators in this market and especially with regard to the obligation of such Organisations to publish a relevant Offer with specific minimum contents and validity.

Approval of OTE's Leased Lines Offer¹²

By virtue of this Decision, EETT approved (with modifications) the Leased Lines Offer submitted by OTE in accordance with the provisions of PD 40/1996¹³ -as amended by PD 156/1999¹⁴- and of EETT Decision 255/84/14-06-2002.

⁷ FEK Issue 46/A/03-03-2000.

⁸ PD 44/2002 "Radio equipment and telecommunications terminal equipment and mutual recognition of their conformity. Adaptation of Greek legislation to Directive 1999/5/EC of the European Parliament and of the Council of 9 March 1999", FEK Issue 44/A/07-03-2002.

⁹ EETT Decision 251/77/2002, FEK Issue 527/B/29-04-2002.

¹⁰ EETT Decision 248/68/2002, FEK Issue 382/B/29-03-2002.

¹¹ EETT Decision 255/84/2002, FEK Issue 810/B/28-06-2002.

¹² EETT Decision 269/73/2002, FEK Issue 17/B/14-01-2003.

¹³ FEK Issue 276/A/22-02-1996.

¹⁴ FEK Issue 153/A/29-07-1999.



Introduction of Part Circuits in the Greek Market¹⁵

EETT approved the introduction of Part Circuits¹⁶ in the Greek market, designating all SMP Operators in the Market for Leased Lines as operators under obligation to provide this service. The relevant Decision recognises the right of every lawfully authorised telecommunications operator (holder of an Individual Licence and/or General Authorisation) to apply for offering this service, taking into account the relevant prices mentioned in the 8th Report of the European Commission.

Prices for Fully Unbundled and Shared Access to the Local Loop¹⁷

By virtue of this Decision, EETT determined provisional prices for the individual elements/services of Fully Unbundled and Shared Access to the Local Loop of OTE, until OTE itself determines, and EETT approves, cost-oriented prices based on the approved "Long-Run Average Incremental Costs based on Current Costs for assets (LRAIC-CC)" costing system. The same Decision recognises the right of every Beneficiary to challenge the cost-orientation of the prices proposed by OTE, as well as the latter's obligation to prove such cost-orientation in all cases.

Provisional Interconnection Charges for Call Termination to the OTE Network for Year 2002¹⁸

EETT determined provisional prices for the basic Interconnection services -call collection and call termination- at the three levels (Local, Single Transit,

Double Transit), effective as of 27 January 2002. These prices, which were the result of a costing study conducted by an independent consulting firm and were further processed by EETT, represented an interim solution until OTE determines cost-oriented Interconnection prices based on the LRAIC-CC methodology approved by EETT.

Approval of OTE's Reference Interconnection Offer for Year 2002¹⁹

In order to ensure compliance with the principles of transparency, impartiality and non-discriminatory access to the fixed public telecommunications network, EETT approved (with modifications) OTE's Reference Interconnection Offer (RIO) for 2002. The 2002 RIO was published in fulfilment of OTE's obligations, as these result from the applicable Greek and Community legislation, for publication of the terms, conditions and prices for the Interconnection services offered. It should be noted that the approved 2002 RIO is considerably improved in comparison to the 2001 RIO, particularly in what regards the Interconnection services offered.

Publication of Certificate of Compliance regarding OTE's Costing System for Interconnection Services²⁰

This refers to the publication by EETT of a Certificate of Compliance by OTE with the EETT-approved costing system for the Interconnection services offered (call termination to, and call origination from, OTE's network), in accordance with PD 165/1999 and Directive 1997/33/EC.

¹⁵ EETT Decision 268/77/2002, FEK Issue 1604/B/30-12-2002.

¹⁶ According to article 1 of the above EETT Decision, a Part Circuit is defined as a Leased Line with one terminating point located in the beneficiary's premises and the other in the premises of the end-user, and with a length not exceeding 5 kilometres.

¹⁷ EETT Decision 253/87/2002, FEK Issue 720/B/13-06-2002.

¹⁸ EETT Decision 247/63/2002, FEK Issue 319/B/19-03-2002.

¹⁹ EETT Decision 261/142/2002, FEK Issue 1199/B/16-09-2002.

²⁰ EETT Decision 267/123/2002, FEK Issue 1531/B/09-12-2002.

Regulation on the Introduction of Carrier in the Greek Market²¹

Taking into consideration the results of the Public Consultation held on the introduction of Carrier Pre-selection and Number Portability, EETT laid down detailed rules concerning introduction of the Carrier Pre-selection facility in the telecommunications market. According to the relevant Decision, the pre-selection facility, together with the corresponding prices for its provision, must be published in the RIO of the telecommunications operator under obligation to provide it.

Approval of Attachment to OTE's Reference Interconnection Offer for Year 2002 concerning Provision of Carrier Pre-selection²²

This Decision approved the terms for provision of Carrier Pre-selection by OTE, which were published as Attachment to OTE's 2002 RIO.

Regulation on the Introduction of Number Portability in the Greek Market²³

By this Regulation EETT laid down detailed rules for introduction of Number Portability in the market, regarding geographical numbers (fixed telephony numbers), non-geographical numbers (freephone numbers, premium rate numbers etc.), and mobile telephony numbers. According to the Regulation, Number Portability should be available as of 1 January 2003 for geographical and non-geographical

numbers, and as of 1 July 2003 for mobile telephony numbers.

Dates for Commencement of the Third Stage in the Introduction of the new National Numbering Plan²⁴ and Determination of the Use of the "696" Series of Numbers under the National Numbering Plan²⁵

By virtue of this Decision, EETT modified the dates for commencement of the last (third) stage in the introduction of the new National Numbering Plan (NNP), as well as the dates for termination of the parallel operation of the old and new dialing schemes, with the aim to allow for more efficient introduction of the new numbering plan and ensure detailed and prompt provision of information to the citizens concerning impending changes. In parallel, EETT issued a Decision determining the series of numbers under the new NNP to be used for Numbering purposes in connection with Public Terrestrial Trunked Radio (TETRA) Digital Mobile Radiocommunication Networks.

Internet, Domain Names and Electronic Signature Issues

Regulation on Assigning and Managing [.gr] Domain Names²⁶

This Regulation determined the procedure for Assignment by EETT of [.gr] Domain Names on the basis of a three-tier scheme (Registrants - Registrars - Registry), and laid down the legal framework for the operation of the Registrars and of the Registry.

²¹ EETT Decision 254/70/2002, FEK Issue 773/B/21-06-2002.

²² EETT Decision 269/66/2002, FEK Issue 1616/B/31-12-2002.

²³ EETT Decision 254/71/2002, FEK Issue 791/B/26-06-2002.

²⁴ EETT Decision 240/5/2002, FEK Issue 25/B/16-01-2002.

²⁵ EETT Decision 265/122/2002, FEK Issue 1440/B/15-11-2002.

²⁶ EETT Decision 268/73/2002, FEK Issue 1617/B/31-12-2002.



*Regulation on the Provision of Electronic Signature Certification Services*²⁷

EETT issued a Regulation on issues related to the provision of Electronic Signature certification services (qualified certificates, provisions for monitoring and control of Electronic Signature Certification Services Providers established in Greece, organisation and operation of a relevant EETT Registry etc.)

Universal Service Issues

*Regulatory Provisions on Universal Service*²⁸ / *Determination of Universal Service Content*²⁹

By virtue of this Decision, EETT regulated issues concerning the application of US, and especially the power of EETT to assign the provision of US to authorised telecommunications undertakings other than the US Provider (USP). In parallel, EETT issued a Decision determining the contents of US, which is a minimum set of telecommunications services that must be provided to the public regardless of the particular geographic location within the Greek territory and at an affordable price.

*Regulation on Universal Service Costing and Pricing Principles*³⁰

After determining the services to be provided under the US, EETT regulated the principles that must govern costing and pricing for such services.

*Designation of Operators under Obligation to provide US*³¹

It should be noted that OTE was re-designated as

Operator under Obligation to Provide US until 31 December 2003.

Publication of Certificate of Compliance regarding OTE's Costing System for Voice Telephony³²

This refers to the publication of a Certificate regarding Compliance by OTE with the EETT-approved Operational Costing System (OCS) for voice telephony services. Publication took place in accordance with the provisions of PD 181/1999 and the corresponding Directive 1998/10/EC.

Regulation on Hearings concerning Telecommunications Issues³³

In the framework of the efforts to modernise and improve its operations, EETT issued a new Regulation on Hearings which considerably simplifies the relevant procedures and shortens the times required for Decisions to be issued, while at the same time allows EETT to intervene and regulate a particular situation through the adoption of interim measures.

Regulation of Issues concerning Payment of Operating Fees for Private Mobile Radio Networks³⁴

By virtue of this Decision, the parties under obligation to pay operating fees for PMR Networks were given the opportunity to apply to EETT for arranging the method of payment of the operating fees due for 2002. In addition, EETT modified the existing Regulation on the Determination of Operating Fees for PMR Networks³⁵.

²⁷ EETT Decision 248/71/2002, FEK Issue 603/B/16-05-2002.

²⁸ EETT Decision 244/124/2002, FEK Issue 188/B/20-02-2002.

²⁹ EETT Decision 255/83/2002, FEK Issue 874/B/12-07-2002.

³⁰ EETT Decision 261/143/2002, FEK Issue 1208/B/18-09-2002.

³¹ EETT Decision 264/140/2002, FEK Issue 1368/B/24-10-2002.

³² EETT Decision 266/96/2002, FEK Issue 1440/B/15-11-2002.

³³ EETT Decision 249/115/2002, FEK Issue 642/B/23-05-2002.

³⁴ EETT Decision 253/88/2002, FEK Issue 709/B/11-06-2002.

³⁵ EETT Decision 220/10/2001, FEK Issue 939/B/29-07-2001.

Regulation on the Assignment of Individual Radio Frequencies to Radiocommunication Stations for Private Use³⁶, Regulation on the Determination of Spectrum Usage Fees and of Radio Frequency Assignment Fees for Private Use and Regulation of Issues regarding Payment of Radio Frequency Spectrum Usage Fees³⁷

EETT regulated the procedures for assignment of individual radio frequencies for private use, as well as the terms and conditions of their use in specific cases (strictly limited to those specifically mentioned in the Regulation), and then proceeded to regulate the method used for calculation and payment of assignment and usage fees for the radio frequency spectrum assigned for private use.

1.2.1. Regulatory Framework for Electronic Communications Networks and Services - The Key Provisions of the New Framework

The existing Regulatory Framework on telecommunications in the European Union (EU) aims to create conditions of effective competition in the sector during the transition from a monopolistic environment to a fully competitive one.

The new Regulatory Framework on electronic communications networks and services reviews the above Framework with the following aims: (a) to ensure further development of effective competition within a fully liberalised market, (b) to expand the range of options available to consumers, and (c) to protect goals of public interest. It consists of a number of measures of a binding nature (Directives, Decisions) and of texts of non-binding nature (soft law).

More specifically, the new Regulatory Framework comprises:

- ▶ Five Directives of the European Parliament and of the Council, of which one is a Framework Directive³⁸ and four are Specific Directives³⁹.
- ▶ A Decision of the European Parliament and of the Council concerning the radio spectrum policy⁴⁰.
- ▶ A Decision of the European Commission⁴¹ establishing the European Regulators Group (ERG).

As regards the texts of non-binding nature, which are a requisite tool for NRAs in order to harmonise and apply the new Framework, these include the following:

- 1) Commission Guidelines on market analysis and the assessment of SMP under the Community Regulatory Framework for electronic communications networks and services⁴².

³⁶ EETT Decision 254/72/2002, FEK Issue 895/B/16-07-2002.

³⁷ EETT Decision 266/93/2002, FEK Issue 1458/B/20-11-2002.

³⁸ Directive 2002/21/EC of the European Parliament and of the Council of 7 March 2002 on a common Regulatory Framework for electronic communications networks and services (Framework Directive), Official Journal (OJ) L 108, 24/04/2002, pp. 0033-0050.

³⁹ Directive 2002/20/EC of the European Parliament and of the Council of 7 March 2002 on the authorisation of electronic communications networks and services (Authorisation Directive) OJ L 108, 24/04/2002 pp. 0021- 0032; Directive 2002/19/EC of the European Parliament and of the Council of 7 March 2002 on access to, and interconnection of, electronic communications networks and associated facilities (Access Directive), OJ L 108, 24/04/2002, pp. 0007-0020; Directive 2002/22/EC of the European Parliament and of the Council of 7 March 2002 on US and users' rights relating to electronic communications networks and services (US Directive), OJ L 108, 24/04/2002, pp. 0051-0077; Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications), OJ L 201, 31/07/2002, pp. 0037-0047; Commission Directive 2002/77/EC of 16 September 2002 on competition in the markets for electronic communications networks and services, OJ L 249, 17/09/2002, pp. 0021-0026.

⁴⁰ Decision No 676/2002/EC of the European Parliament and of the Council of 7 March 2002 on a regulatory framework for radio spectrum policy in the European Community (Radio Spectrum Decision), OJ L 108, 24/04/2002, pp. 0001-0006.

⁴¹ 2002/627/EC: Commission Decision of 29 July 2002 establishing the European Regulators Group for electronic communications networks and services, OJ L 200, 30/07/2002, pp. 0038-0040.

⁴² 2002/C/165/03.



2) Commission Recommendation on Relevant Product and Services 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.

The key regulatory provisions introduced by the new Regulatory Framework concern:

- ▶ Its scope.
- ▶ The role of NRAs, to which EETT belongs.
- ▶ The spirit and purpose of the revision.

More specifically, regulatory interventions in the market - through the enforcement of obligations in advance - are restricted under the new Framework, while the application of competition rules and principles is strengthened.

In parallel, the convergence of the telecommunications, media and information technology sectors is realised through the introduction of a "Horizontal Approach". According to this approach, a single Regulatory Framework, regardless of the type of information transferred, governs all transmission networks and services, including networks used for radio-TV broadcasts and cable television networks. It should be noted that the contents of the services provided through electronic communications networks remain outside the scope of application.

Acting as a driving force in the process of liberalisation of the telecommunications market, NRAs see their role further strengthened and consolidated under the new Regulatory Framework. NRAs are now elevated to trustees of the electronic communications market, as they assume the main responsibility for implementation and application of the new Framework.

Their broad-ranging powers refer to the analysis and definition of relevant markets, the designation of SMP Operators and the enforcement and/or lifting of obligations. In performing their tasks, they also have broad-ranging powers for information/data gathering from market players.

Member states are called upon to guarantee the independence of NRAs, ensuring that these are legally separate and operationally independent from all network operators, equipment suppliers or electronic communications services providers. The main goals are to ensure impartiality and transparency of NRAs in the exercise of their powers, as well as to make available to them the resources that they need in order to accomplish their tasks, in terms of personnel, expertise and funds.

Actions by NRAs must observe the fundamental principles of proportionality and technological neutrality, which are founded on specific policy goals. More specifically, in terms of goals, NRAs are called upon to promote competition and the interests of EU citizens, and to contribute to the development of the internal market.

The fundamental rationale underlying the new Regulatory Framework is the reduction of regulatory interventions in the market. In parallel, the capability for NRAs to intervene, where this is necessary, is recognised. An additional goal is to improve cooperation between the Commission and NRAs, through the introduction of a new consultation and transparency mechanism⁴³, which acts as counterbalance to the increased flexibility granted to NRAs.

Under the new Framework, the Commission in the relevant Recommendation identifies national markets under regulation at a first level, and then they are

⁴³ Articles 6 and 7 of the Framework Directive provide for the obligation to hold consultations at the national level (article 6), and at the European level with other NRAs [Framework Directive, article 7(2), 7(3)] and with the Commission Framework Directive, article 7(3) or article 7(4)].

also identified by NRAs, who may derogate from the Commission Recommendation, provided that such derogation is necessitated and justified by national circumstances. In defining markets, NRAs are called upon to follow the methodology of competition law.

NRAs then intervene in the relevant markets only in cases where effective competition does not exist, by enforcing obligations on operators with SMP, a concept which is now equated to that of Dominant Position, as the latter has been defined in the jurisprudence of the European Court of Justice (ECJ)⁴⁴.

The provisions of the new Regulatory Framework ensure a smooth transition from the current to the forthcoming Framework. More specifically, according to the Framework Directive⁴⁵, the procedure for the analysis of markets must begin as soon as possible after the adoption of the Commission Recommendation. NRAs are called upon to review the obligations enforced on the basis of the current Regulatory Framework. In parallel, provisions have been made to maintain all the above obligations in force until the review procedure for the relevant markets has been completed.

Harmonisation of the Greek law with the new Regulatory Framework, through the enactment of all necessary legislative, regulatory and administrative acts, must be completed by 24 July 2003 at the latest, in order to enter into effect as of 25 July 2003.

Until the harmonisation process carried out by the Ministry of Transportation and Communications, is completed, EETT is preparing the application of the forthcoming Framework which will be called upon to implement, and is actively following the relevant international developments. More specifically, in

the framework of the Independent Regulators Group (IRG), EETT is actively participating in the work of the relevant Group (Implementation Working Group), whose mandate is to identify and formulate a common approach during the harmonisation process carried out by member states, with the aim to achieve the highest degree possible in the harmonised transposition and subsequent application of the Directives in the national jurisdictions.

The purpose of the legislative framework governing the operation of the telecommunications sector, as implemented and specified by EETT through interventions of a regulatory nature, is to achieve full liberalisation of the telecommunications sector, ensure smooth operation of competition in the relevant markets, and develop new innovative networks and services which are available to the public at affordable prices. Consequently, the individual regulations are supplemented and assessed on the basis of their practical results.

The market overview that follows (sub-section 1.3.), leads to useful conclusions regarding the impact of EETT's regulatory interventions in the Greek market, and highlights the positive effect of liberalisation on the telecommunications sector in terms of increased competition between service providers / network operators, as well as in terms of the benefits to the consumers, who enjoy high-quality services at lower prices.

1.3. Market Overview

The evolution of the Greek telecommunications services market in 2002 was characterised by reductions in the prices for telecommunications services, intense competition in the mobile services market, expansion

⁴⁴ More specifically, according to the definition given in article 14, par. 2 of the Framework Directive, an undertaking shall be deemed to have SMP if, either individually or jointly with others, it enjoys a position equivalent to Dominance, that is to say a position of economic strength affording it the power to behave to an appreciable extent independently of competitors, customers and, ultimately, consumers.

⁴⁵ Article 16, paragraph 1.

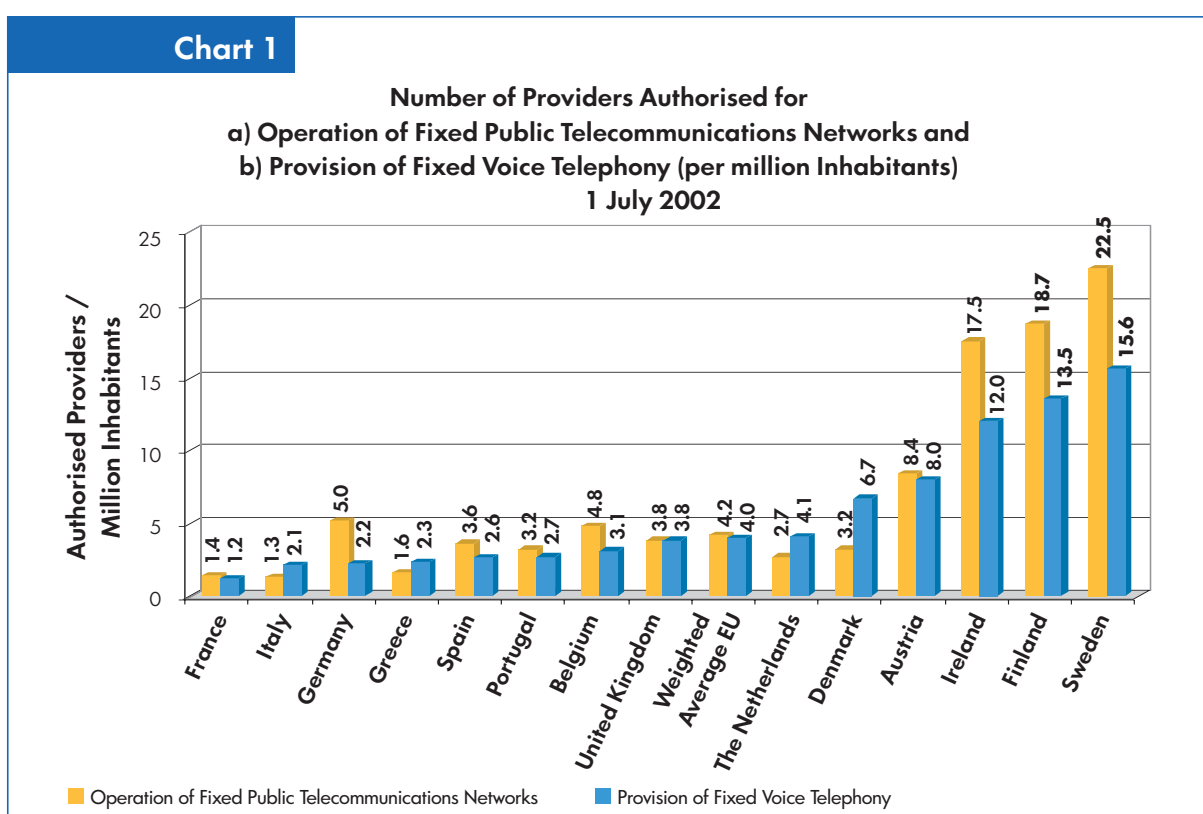


of the range of options available to users in the fixed telephony market, and increase in the use of Internet, Leased Lines and data transmission services.

The turnover of telecommunications services providers in Greece is estimated to have increased by more than 10% during the first three quarters of 2002 compared with the first three quarters of 2001, with the forecasted GDP growth rate for the same period standing at 4%⁴⁶.

For the combined 15 EU member states, the growth rate for the telecommunications services market for 2002 is estimated to vary from 5%⁴⁷ to 7%⁴⁸, with the forecasted EU GDP growth rate standing at 1%⁴⁹.

Chart 1 presents two indicators of the business interest in the Greek market for fixed public telecommunications networks and voice telephony services, as these indicators stood in mid-2002, and compares them to the situation in the markets of EU member states⁵⁰.



Source: 8th Report of the European Commission

Note 1: Both provider categories shown in the chart include Providers Authorised for Operation of Fixed Public Telecommunications Networks and for Provision of Fixed Voice Telephony.

Note 2: Fixed Voice Telephony Providers include, in the case of Greece at least, only the Corresponding Individual Licences.

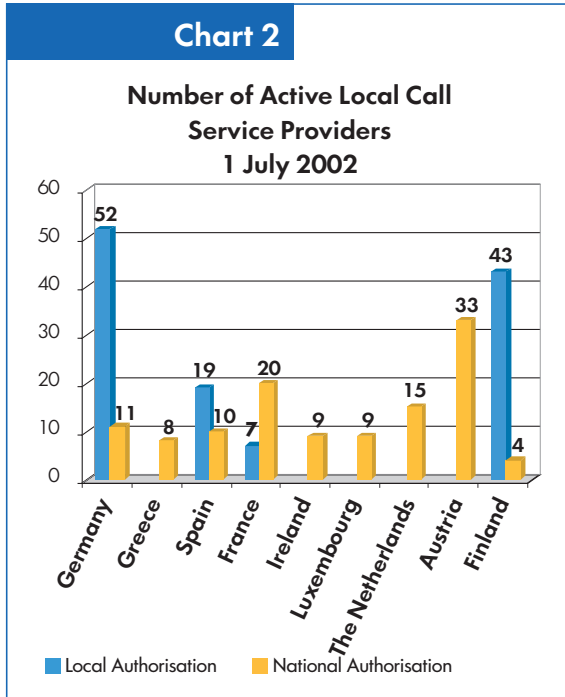
⁴⁶ Source: based on National Statistical Service data.

⁴⁷ Source: 8th Report of the European Commission, EITO (European Information Technology Observatory) 2002.

⁴⁸ Source: 8th Report of the European Commission, IDATE, Telecoms in Europe, November 2002.

⁴⁹ Source: 8th Report of the European Commission, European Commission Services.

⁵⁰ Excluding Luxembourg.



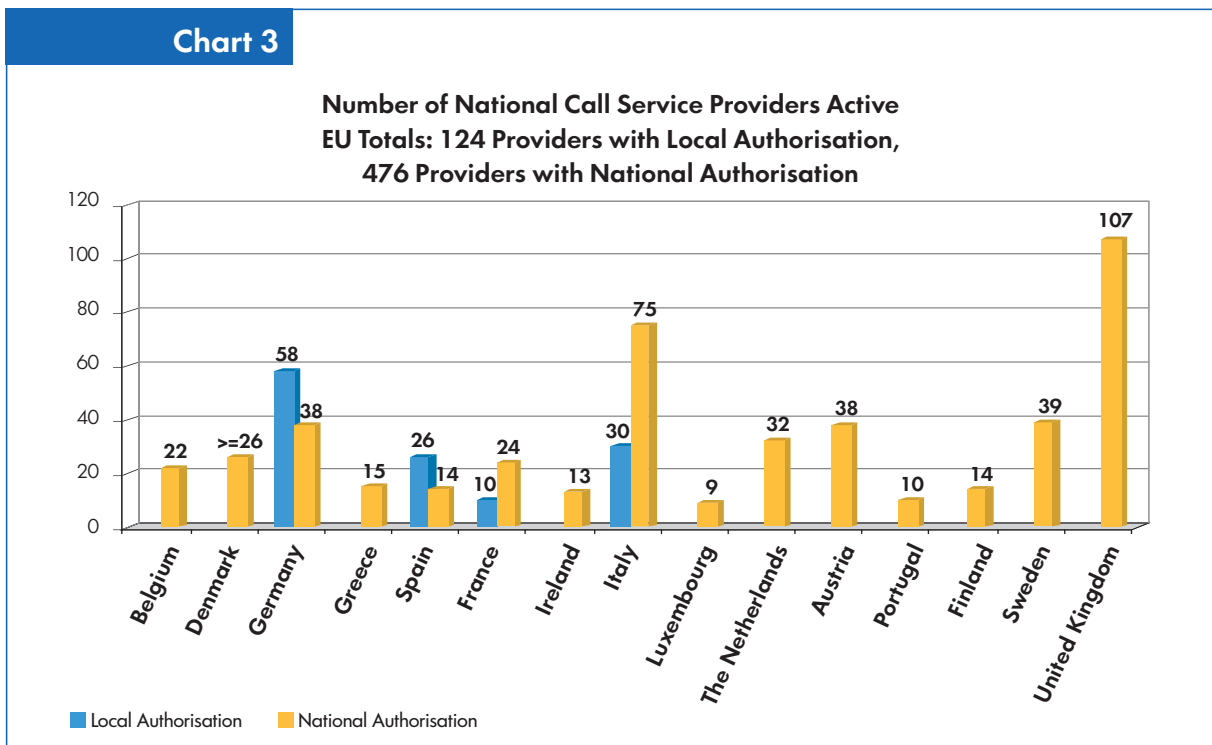
In terms of absolute values, in mid-2002 the companies holding an Individual Licence for operation of a fixed public network and provision of fixed voice telephony in Greece were 17 and 24, respectively. Concerning in particular the provision of fixed voice telephony; of these 24 companies 15 were active in mid-2002, of which 8 in the provision of local calls. Charts 2 to 4 highlight the competition dynamics by type of service provided in Greece compared to the other member states.

In these charts, operators under National Authorisation are the operators holding an authorisation which covers - in geographical terms - the entire country, or an authorisation whose range is unspecified (depending on the authorisation regime applicable in each country).

Source: 8th Report of the European Commission

Note 1: Only Fixed Voice Telephony Providers holding Individual Licences are included.

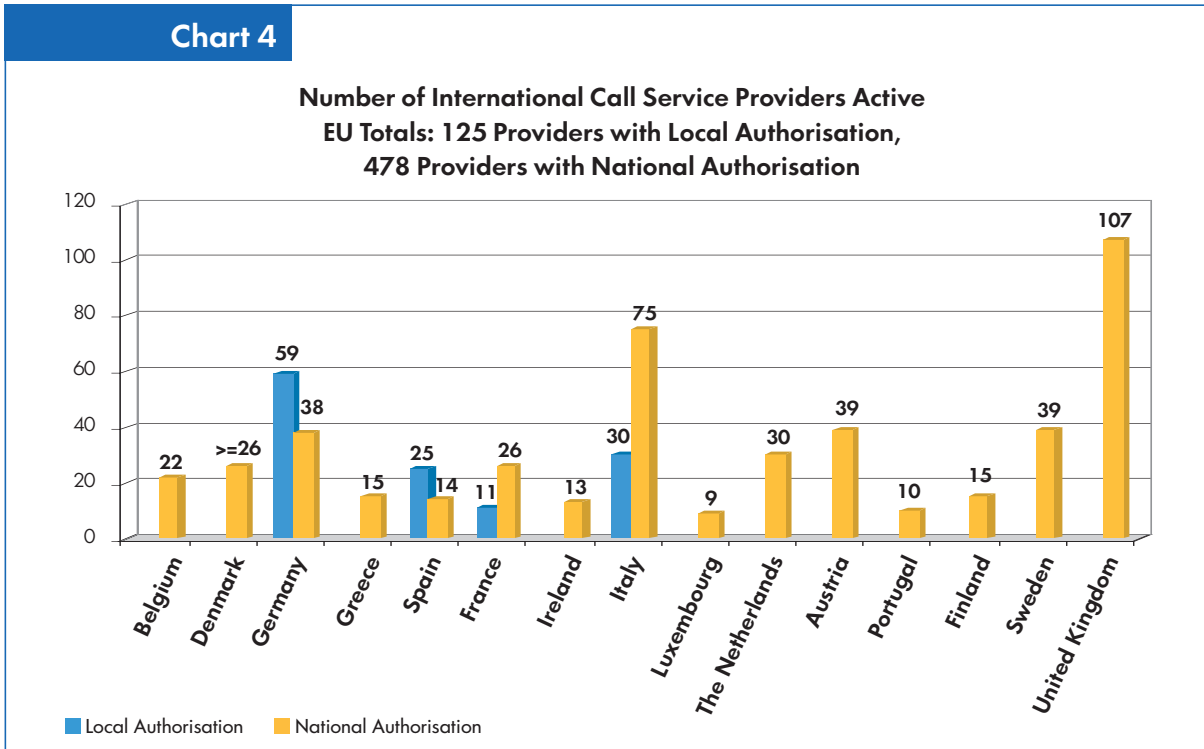
Note 2: Information is not available for member states not included in the Chart.



Source: 8th Report of the European Commission

Note 1: Only Fixed Voice Telephony Providers holding Individual Licences are included.

Note 2: For Belgium, Denmark, Italy, Portugal, Sweden and the United Kingdom, no distinction is possible by type of calls provided (local, national, international). In addition, no distinction is made between Local and National Authorisations in the United Kingdom.



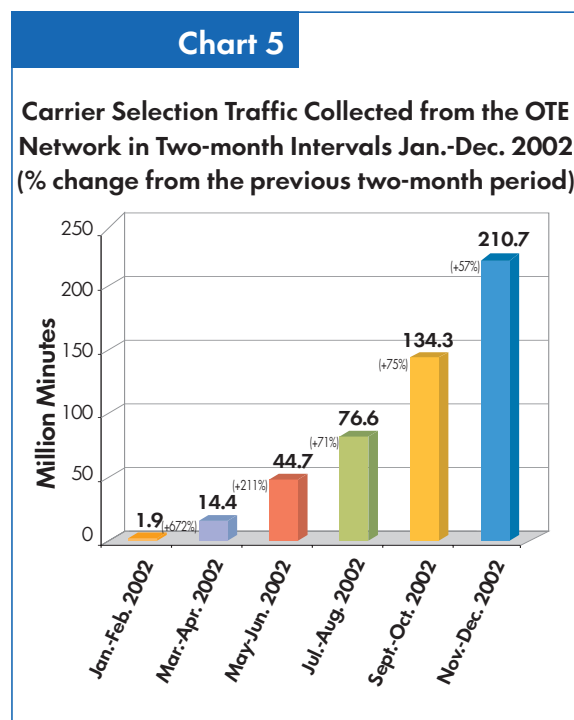
Source: 8th Report of the European Commission

Note 1: Only Fixed Voice Telephony Providers holding Individual Licences are included.

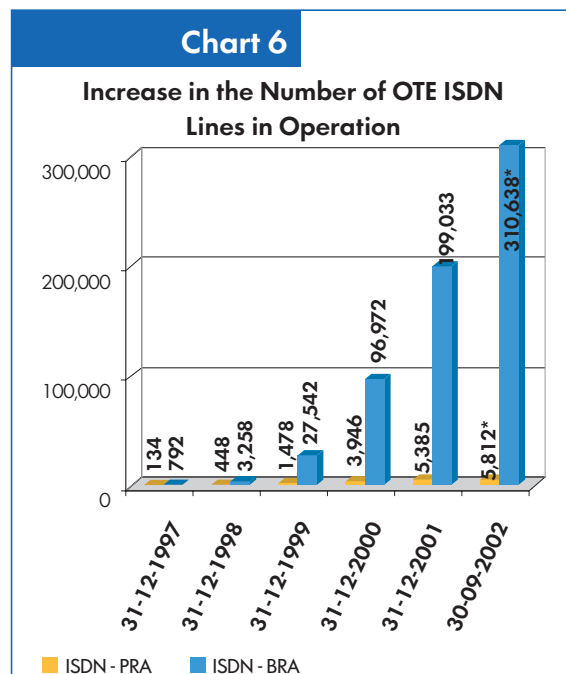
Note 2: For Belgium, Denmark, Italy, Portugal, Sweden and the United Kingdom, no distinction is possible by type of calls provided (local, national, international). In addition, no distinction is made between Local and National Authorisations in the United Kingdom.

Competition in the Greek market for fixed voice telephony started to grow in 2002: this is attributed mainly to the gradual launch of commercial operations by companies providing relevant services using Carrier Selection.

Based on EETT data, the number of operators using Carrier Selection in mid-2002 and at the year-end was 7 and 11, respectively. The number of private and business users of voice telephony services via Carrier Selection was around 140,000 in mid-2002, a figure that corresponds to around 2.4% of OTE connections (the operator with Dominant Market Position). The evolution of fixed voice telephony interconnection traffic collected from OTE's network via Carrier Selection in the period January-December 2002 (see Chart 5) illustrates the intensification of competition in this market.



Based on provisional OTE data for the first three quarters of 2002, the number of Integrated Services Digital Network (ISDN)-based telephony users in Greece continued to rise. At the end of the first three quarters of 2002, the numbers of OTE subscriber lines for ISDN Basic Rate Access (ISDN BRA - 2 Channels) and ISDN Primary Rate Access (ISDN PRA - 30 channels) are estimated to have increased by 56% and 8%, respectively, compared to the beginning of the same year (see Chart 6 and Table 1).



* Based on provisional OTE data

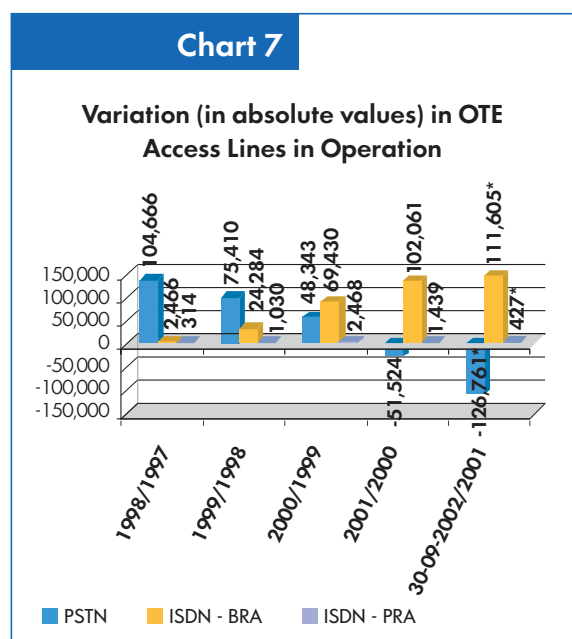
Table 1

OTE Data	31-12-1997	31-12-1998	31-12-1999	31-12-2000	31-12-2001	30-09-2002
PSTN access lines in operation	5,430,855	5,535,521	5,610,931	5,659,274	5,607,750	5,480,989*
ISDN BRA access lines in operation - Basic Rate Access (2 channels)	792	3,258	27,542	96,972	199,033	310,638*
ISDN PRA access lines in operation - Primary Rate Access (30 channels)	134	448	1,478	3,946	5,385	5,812*

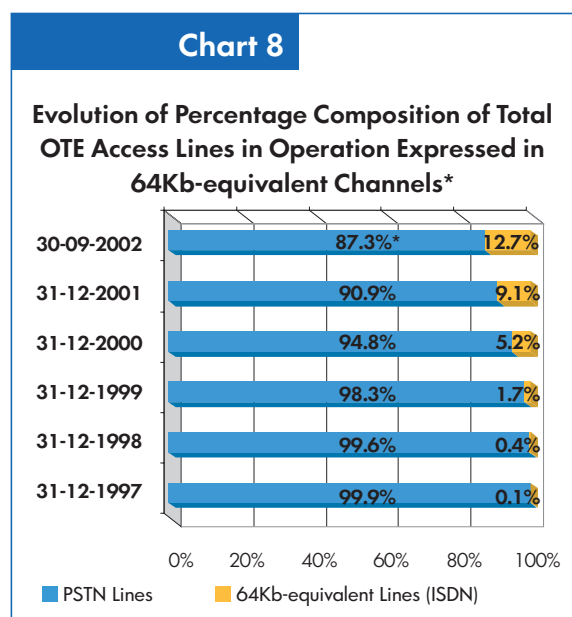
* Based on provisional OTE data



However, a decrease is observed in Public Switched Telephone Network (PSTN) subscriber lines, which may be explained by the fact that subscribers upgrade their PSTN connections to ISDN (see Charts 7 and 8).

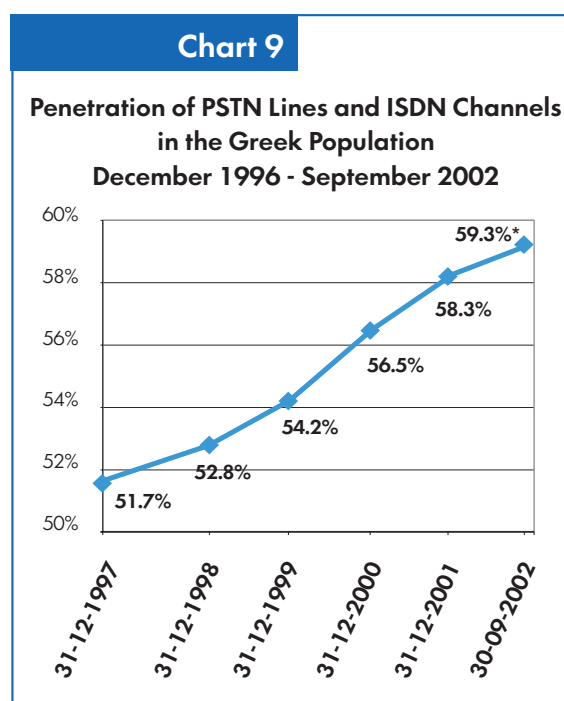


* Based on provisional OTE data



* Based on provisional OTE data

The total number of OTE access channels, measured in 64Kb-equivalent channels, shows an upward trend. Thus, penetration of PSTN lines and ISDN channels in Greece at the end of September 2002 is estimated to be of the order of 59.3% (see Chart 9).



* EETT estimate

As regards tariffs for fixed voice telephony, in January 2002 OTE reduced the call charge unit cost for local calls to 0.026 euro/min. (8.9 GRD/min.) from 0.031 euro/min. (10.50 GRD/min.)⁵¹, and that for national calls to 0.063 euro/min. (21.5 GRD/min.) from 0.082 euro/min. (28 GRD/min.)⁵². At the same time, OTE increased the monthly rental charge from 8.22 euro (2,800 GRD) to 9.98 euro (3,400 GRD).

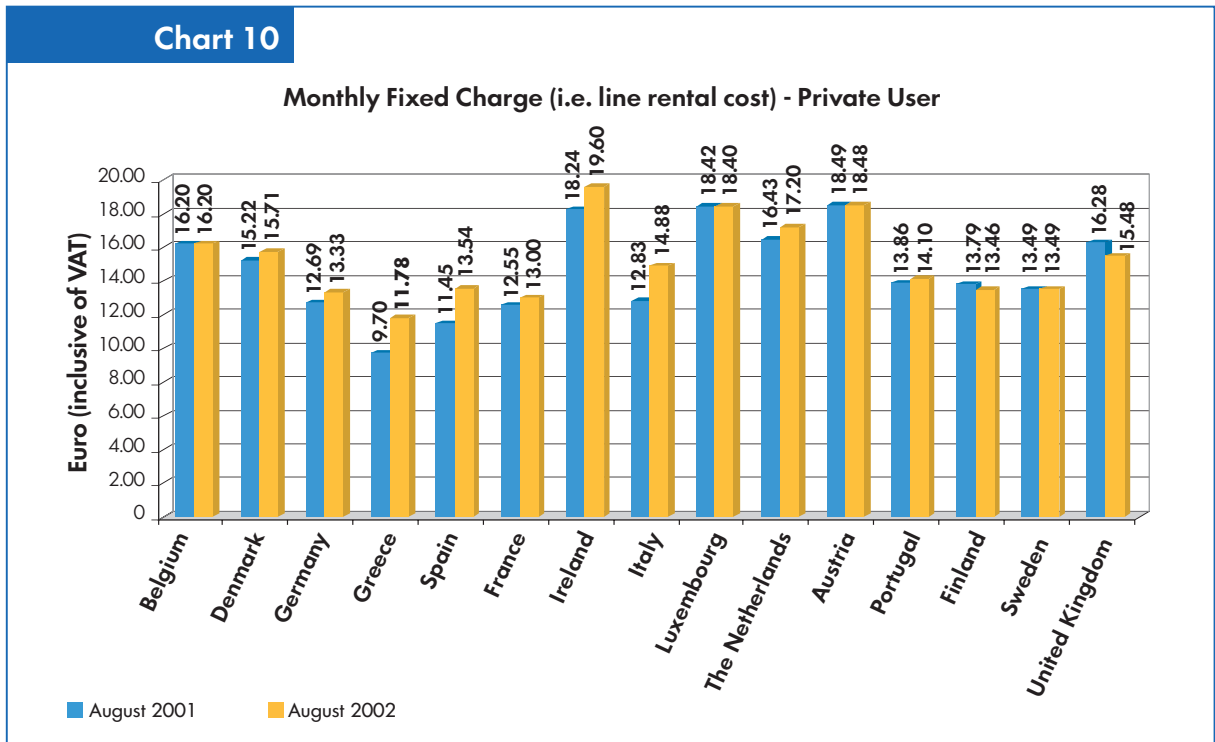
Based on August 2002 data, OTE remains, in terms of the monthly rental charge, the lowest-price operator

⁵¹ OTE is using a charging system based on charge units. For national calls where the calling party and the called party belong to primary exchanges in different prefectures and the distance between such primary exchanges is greater than 45 kilometres, the charging applied is 0.026 euro per 24.9 seconds. A call part with a duration of less than 24.9 seconds, if any, is rounded up to 24.9 seconds and charged at 0.026 euro.

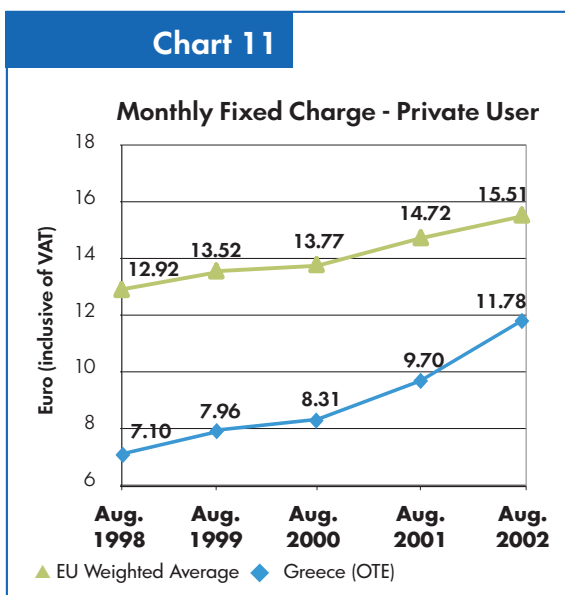
⁵² The corresponding charging rate applied before January 2002 (for national calls where the calling party and the called party belong to primary exchanges in different prefectures and the distance between such primary exchanges is greater than 45 kilometres) is 0.031 euro per 22.5 seconds.

with Dominant Market Position in comparison to corresponding operators in the other EU, member states, for both private users (see Chart 10) and business users.

It should be noted that purchasing power parities have not been taken into account in the estimates presented for each country in this paragraph, as the unit used for comparisons is the euro.



Source: 8th Report of the European Commission

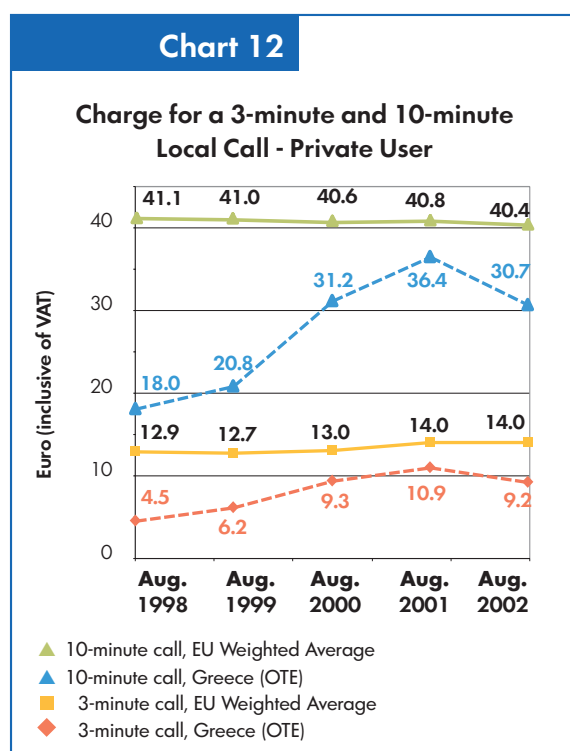


Source: EETT and 8th Report of the European Commission

The weighted (by the population of each member state) average of the monthly rental charge applied by EU operators with Dominant Market Position shows an upward trend, as also is the case with the monthly rental charge of OTE (see Chart 11).

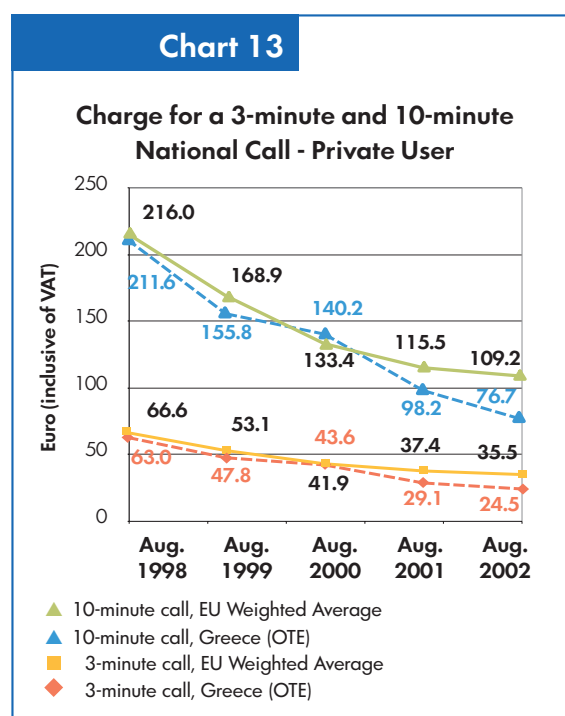


In Chart 12, the dotted line is used to show the evolution of charges for a private user making a three-minute and a ten-minute peak-time local call through OTE⁵³. The same data are also shown on the Chart for the EU weighted average (that is, taking into account the weighted average of the corresponding tariffs of the incumbent operator in each EU member state). Based on August 2002 data, OTE was the second lowest-price operator with Dominant Market Position in the EU for a three-minute call, and the fifth lowest-price operator for a ten-minute call. In both cases, OTE charges are lower than the EU weighted average.



Source: EETT and 8th Report of the European Commission

Similarly, Chart 13 presents the evolution of charges for a three-minute and a ten-minute peak-time national call for a private subscriber of OTE, together with the corresponding values for the EU weighted average. In August 2002, OTE was ranked sixth and seventh lowest-price operator among EU operators with Dominant Market Position for a three-minute and a ten-minute national call, respectively, and its charges were again lower than the EU average.

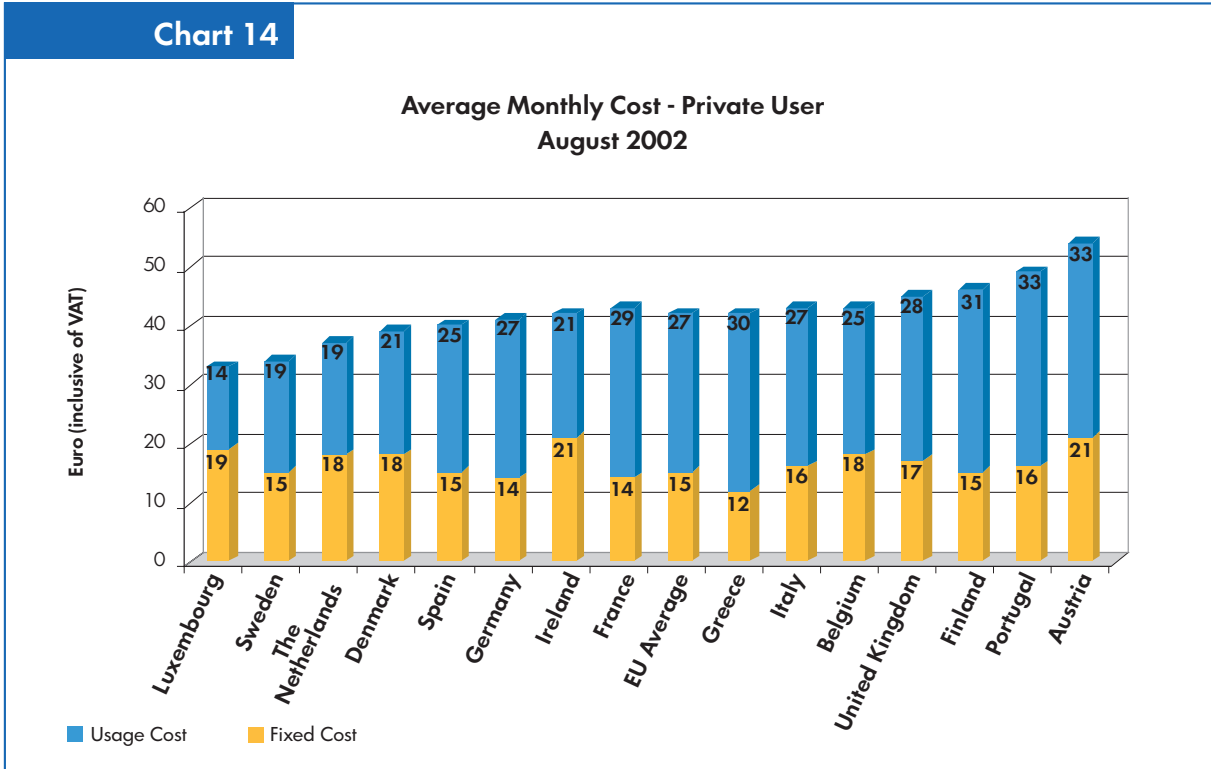


Source: EETT and 8th Report of the European Commission

Finally, Chart 14 presents, for each member state, the average monthly expenditure for a private user for the calls made using a fixed telephone. Comparison data are presented for each country, but in essence they refer to the operator with Dominant Market Position in each country.

⁵³ It should be noted that under the new tariffs mentioned, no distinction is made anymore between peak time and off-peak time charges.

Chart 14



Source: 8th Report of the European Commission

Note 1: The data shown above are derived on the basis of a methodology developed by the Organisation for Economic Cooperation and Development (OECD) and also applied by the EU in international tariff comparisons. According to this methodology, a "basket" containing specific and clearly described telecommunications services is first defined, and is then used to calculate the cost to the user of the incumbent telecommunications provider in each member state of using the services contained in that "basket".

Note 2: According to the methodology applied, the cost to a private user is defined in such a way so as to include, on an annual basis: (a) the fixed cost, defined as the monthly rental charge plus installation costs for a new connection (amortised in 5 years); and (b) the usage cost (i.e. variable cost), which refers to 1,200 national calls to fixed phones, 120 calls to mobile phones⁵⁴ and 72 international⁵⁵ calls.

As shown in Chart 14, and based on the methodology applied, in August 2002 this average monthly expenditure in Greece was very close to the EU average. It should be noted that, compared to August 2001, this expenditure has decreased (in current prices) by 5%⁵⁶.

Intensification of the competition in the sector of Second Generation (2G) Mobile Communications Services in Greece during 2002 led to considerable developments in this market.

The three operators already active in the sector (COSMOTE S.A., STET HELLAS S.A., VODAFONE-PANAFONE) were joined by Q-TELECOM, which started its commercial activities in the provision of 2G Mobile Communications Services in June 2002.

The turnover of the above companies is estimated to have increased by more than 25% in the first three quarters of 2002, compared to the same period in 2001⁵⁷.

⁵⁴ i.e. 10% of the number of calls to fixed phones.

⁵⁵ i.e. 6% of the number of calls to fixed phones.

⁵⁶ Source: EETT, 8th and 7th Report of the European Commission.

⁵⁷ It should be noted that in the case of Q-TELECOM, only the turnover from mobile services has been taken into account.



According to the 8th Report of the European Commission, the number of mobile telephony subscribers in the EU continued to increase in 2002, albeit at a lower rate compared to previous years, due also to the relative saturation that has already been reached in the corresponding market of some member states. The average mobile penetration rate for EU was estimated at 75% in August 2002, compared to 70% in August 2001. An increase, although at a lower annual rate, was also observed in the number of mobile telephony subscribers in Greece. Based on the above source, mobile penetration in Greece reached EU average.

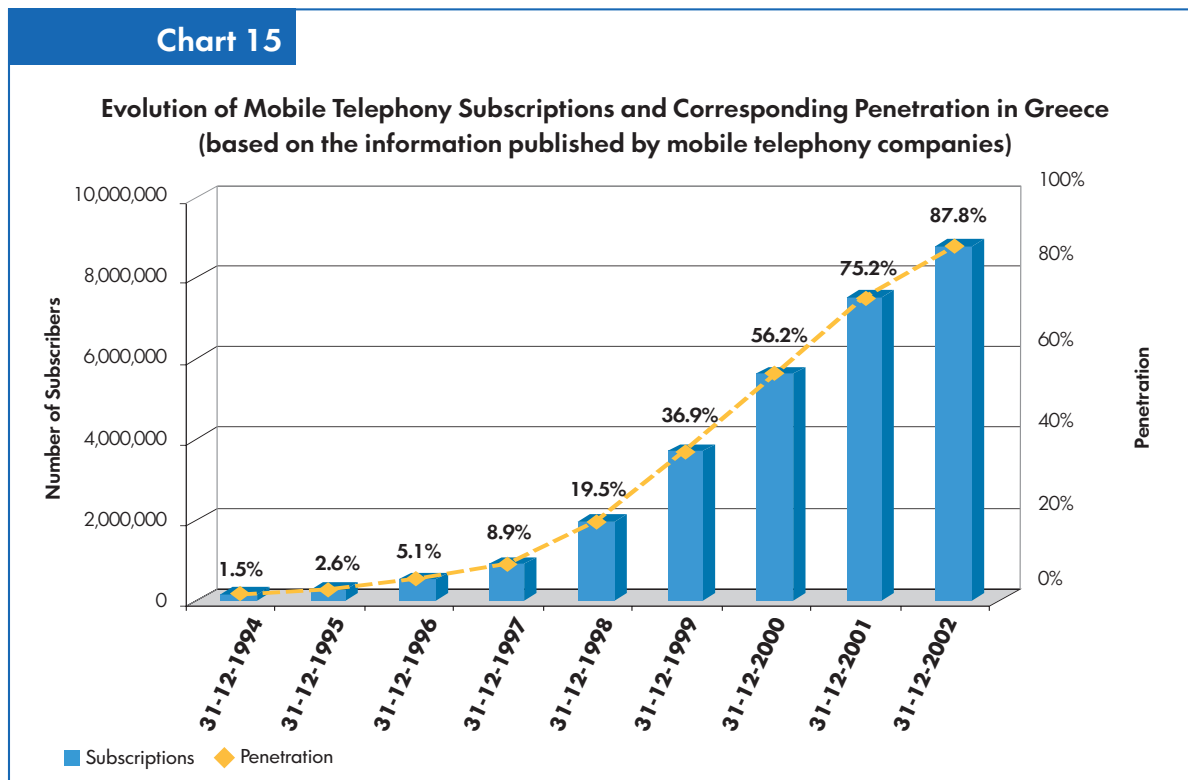
It should be noted that the quantitative data (subscriptions, penetration, market shares) given in the paragraphs that follow are based on information published by the operators.

Based on the relevant announcements made by the mobile telephony operators, mobile telephony subscriptions in Greece are estimated to have reached 9.31 million at

the end of 2002, a 17% increase compared to the end of 2001. The figures announced also take into account subscribers with more than one subscription, as well as non-active subscribers.

According to a country-wide survey, conducted for the second year running on behalf of the National Research and Technology Network (GRNET)⁵⁸ and based on a sample representative of the national population, in September 2002 the number of adult (i.e. over 15 years old) mobile telephone owners was estimated at 5,574,169, a figure that corresponds to 63.6% ($\pm 1.9\%$) of the country's adult population. In the corresponding survey conducted last year (June-July 2001), mobile penetration had been estimated at 49.8% ($\pm 1.3\%$) of the adult population, which corresponded to 4,399,265 adult mobile telephone owners.

Chart 15 and Table 2 present the evolution over time of mobile telephony subscriptions and penetration in Greece, based on the announcements made.



⁵⁸ The survey sample comprised 2,464 persons of over 15 years of age in an equal number of households; data were also recorded for the remaining 5,566 members of the households surveyed.

Table 2

Evolution of Mobile Telephony Subscriptions and Penetration in Greece (based on information published by mobile telephony operators)									
	31-12-1994	31-12-1995	31-12-1996	31-12-1997	31-12-1998	31-12-1999	31-12-2000	31-12-2001	31-12-2002
Subscriptions	153,830	272,950	531,488	938,038	2,056,084	3,894,312	5,932,403	7,963,742	9,314,260
Annual change		77%	95%	76%	119%	89%	52%	34%	17%
Penetration (based on subscriptions)	1.5%	2.6%	5.1%	8.9%	19.5%	36.9%	56.2%	75.2%	87.8%

In addition, Chart 16 presents separately the evolution of the numbers of mobile prepaid card subscribers and contract subscribers. The annual growth rates of these categories for 2002 were 20.6% and 10.7%, respectively.

Chart 17 presents the evolution over time of the market shares of mobile telephony operators, as a proportion of their total number of subscribers (see also Table 3).

Chart 16

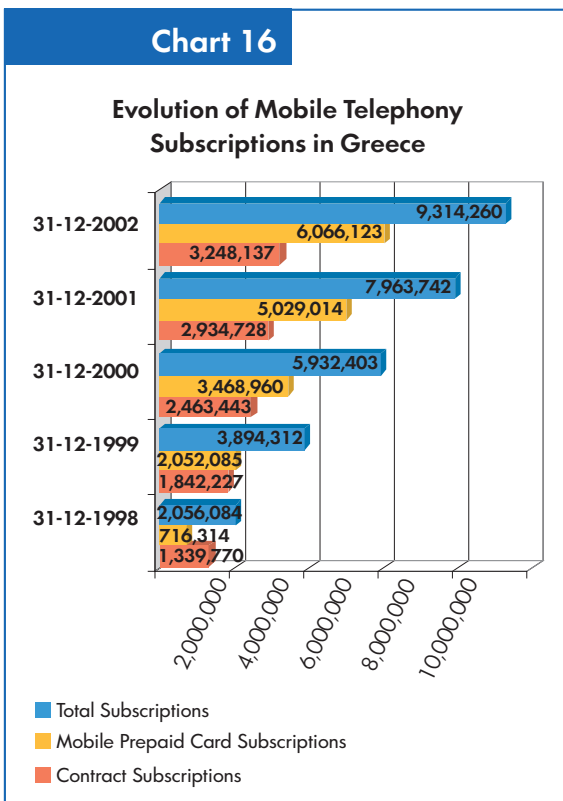
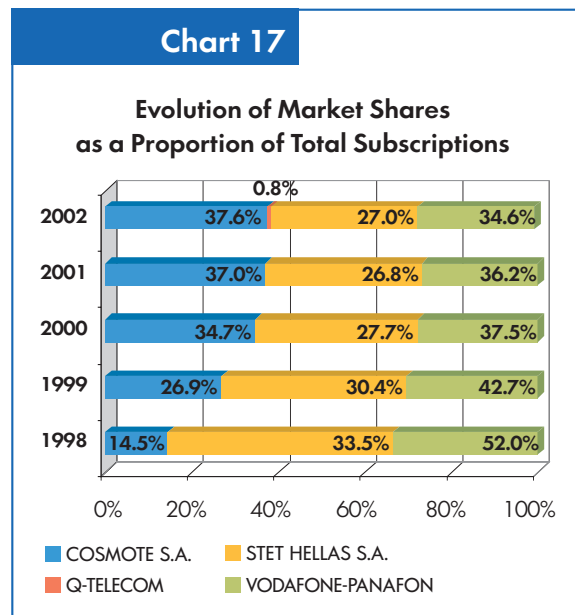


Chart 17



**Table 3****Subscribers of Mobile Telephony Operators**

	31-12-1998	31-12-1999	31-12-2000	31-12-2001	31-12-2002
COSMOTE S.A.					
Mobile prepaid card subscribers	36,684	370,586	855,946	1,481,765	1,954,897
Contract subscribers	262,154	677,766	1,205,065	1,461,767	1,551,441
Total subscribers	298,838	1,048,352	2,061,011	2,943,532	3,506,338
Q-TELECOM					
Mobile prepaid card subscribers	-	-	-	-	57,222
Contract subscribers	-	-	-	-	18,341
Total subscribers	-	-	-	-	75,563
STET HELLAS S.A.					
Mobile prepaid card subscribers	297,464	733,470	1,128,014	1,472,575	1,745,726
Contract subscribers	391,150	449,281	517,378	662,763	767,916
Total subscribers	688,614	1,182,751	1,645,392	2,135,338	2,513,642
VODAFONE-PANAFON					
Mobile prepaid card subscribers	382,166	948,029	1,485,000	2,074,674	2,308,278
Contract subscribers	686,466	715,180	741,000	810,198	910,439
Total subscribers	1,068,632	1,663,209	2,226,000	2,884,872	3,218,717
Totals					
Mobile prepaid card subscribers	716,314	2,052,085	3,468,960	5,029,014	6,066,123
Contract subscribers	1,339,770	1,842,227	2,463,443	2,934,728	3,248,137
Total subscribers	2,056,084	3,894,312	5,932,403	7,963,742	9,314,260

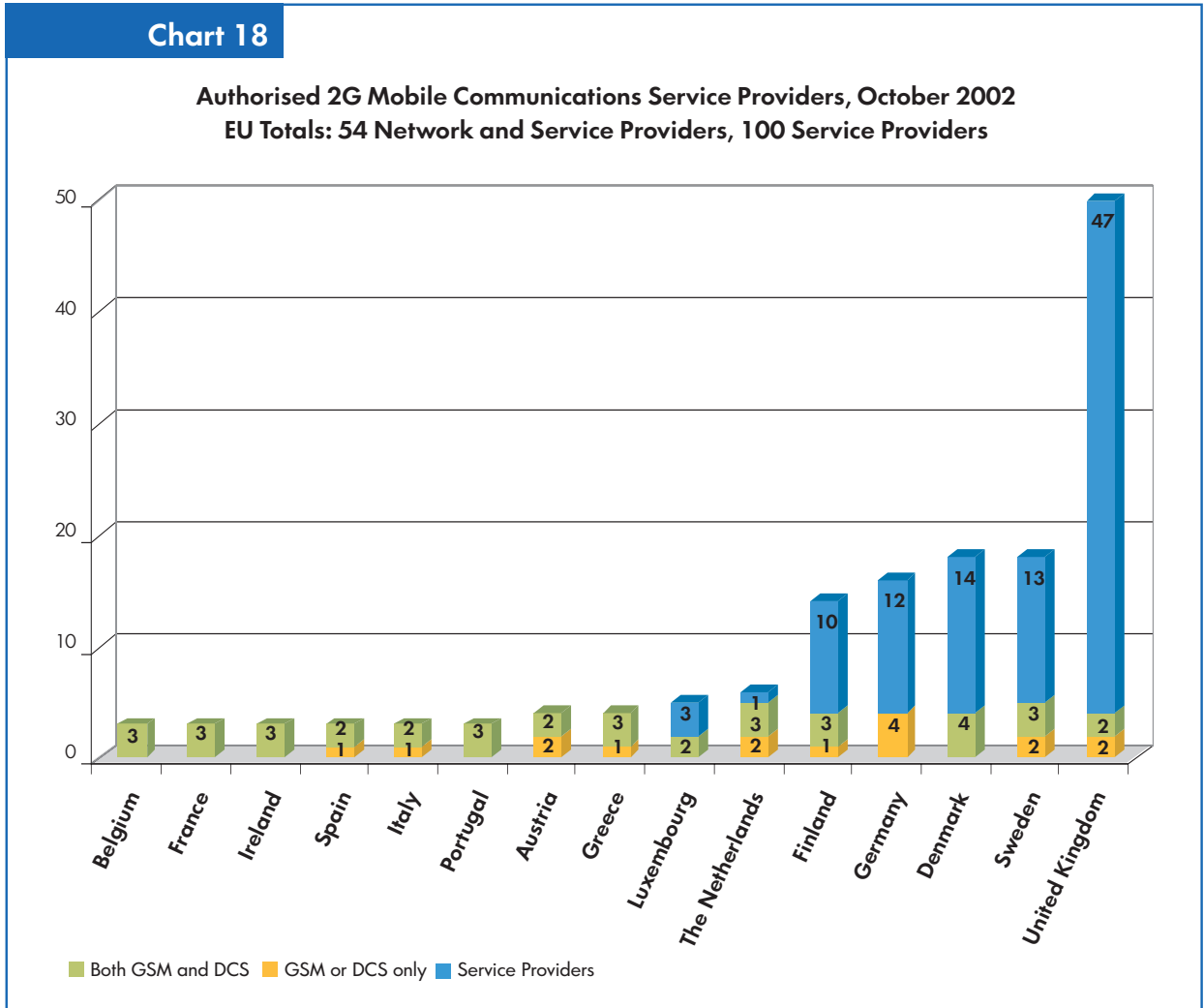
In 2002, the Greek mobile services market was characterised by the ever-increasing offer of data transmission and value-added services which cover a broad range of requirements. The key categories of these services cover information update (news on the economy, sports, weather etc.), entertainment and interpersonal communications. Through the use of standalone services or integrated service packages, subscribers are offered the opportunity to communicate with each other, download special ringtones and logos, participate in knowledge games, retrieve information on entertainment events and locations etc.

Short Message Service (SMS) and access via voice-gateways are the basic methods used for providing these services, while WAP-based (Wireless Application Protocol) access enjoys less preference. In addition, as of the end of 2002 services of this type are also offered through transmission and reception of Multimedia Message Service (MMS) messages.

Value-added services addressed to corporate users, such as the capability to access a subscriber's corporate network through a mobile phone ("Mobile Office" type of service), are also exhibiting significant growth.

As regards the Third Generation (3G) Mobile Communications Authorisations granted within the EU up to October 2002, the majority of them were issued to operators active in the 2G Mobile Communications

Services market, while only 14 were issued to new entrants. The situation in the authorisations for 2G and 3G Mobile Communications Services is shown by member state in Charts 18 and 19, respectively.

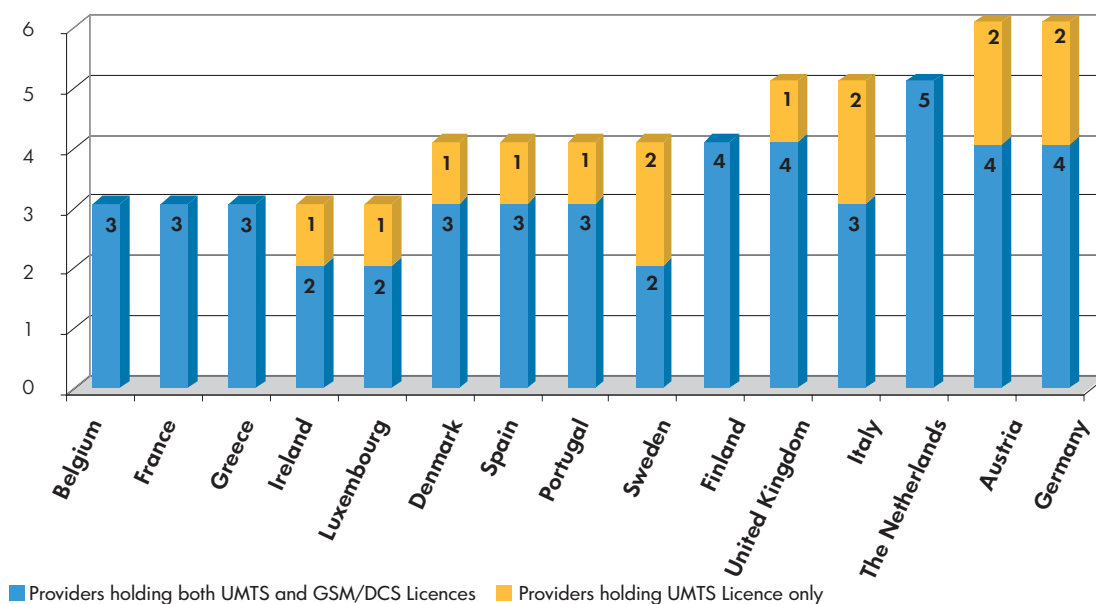


Source: 8th Report of the European Commission



Chart 19

Licences for 3G (UMTS) Mobile Services, October 2002
EU Total: 62 Licences



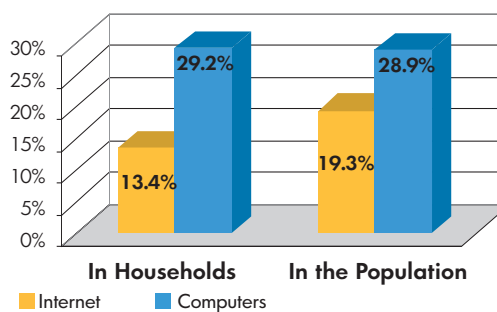
Source: 8th Report of the European Commission

Concerning Internet, its growing use in Greece during the last two years is evidence of promising prospects, despite delays in relevant advances compared to other EU member states. For example, it is reported that broadband access services for residential users and Small and Medium Enterprises - SMEs (e.g. ADSL-based) are not yet offered in Greece, in contrast to the situation in all other EU member states and despite increasing needs for provision of these services.

According to a recent market survey, Internet penetration in the adult population (i.e. over 15 years old) is estimated to have reached 19.3% in September 2002 (a percentage corresponding to 1,704,936 users), with penetration in households estimated at 13.4% (based on which a total of 429,314 households are estimated to have a connection to the Internet). These penetration rates are presented in Chart 20, together with the percentage of adult computer users and the percentage of households owning a computer.

Chart 20

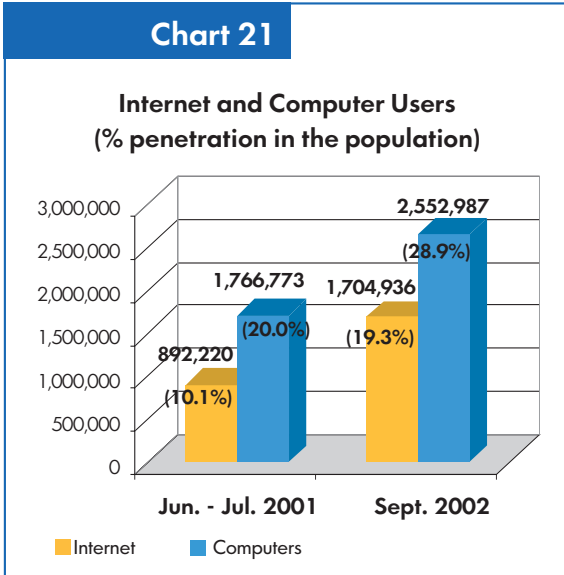
Internet and Computer Penetration in Households and in the Population, September 2002



Source: Market Survey on behalf of GRNET

Chart 21 presents estimates on the evolution of the number of users and on Internet and computer penetration⁵⁹ from mid-2001 to September 2002.

⁵⁹ For the purposes of simplification, use of the terms "user" and "penetration in the population" in the present document shall hereinafter refer to adult users and to penetration in the adult population.



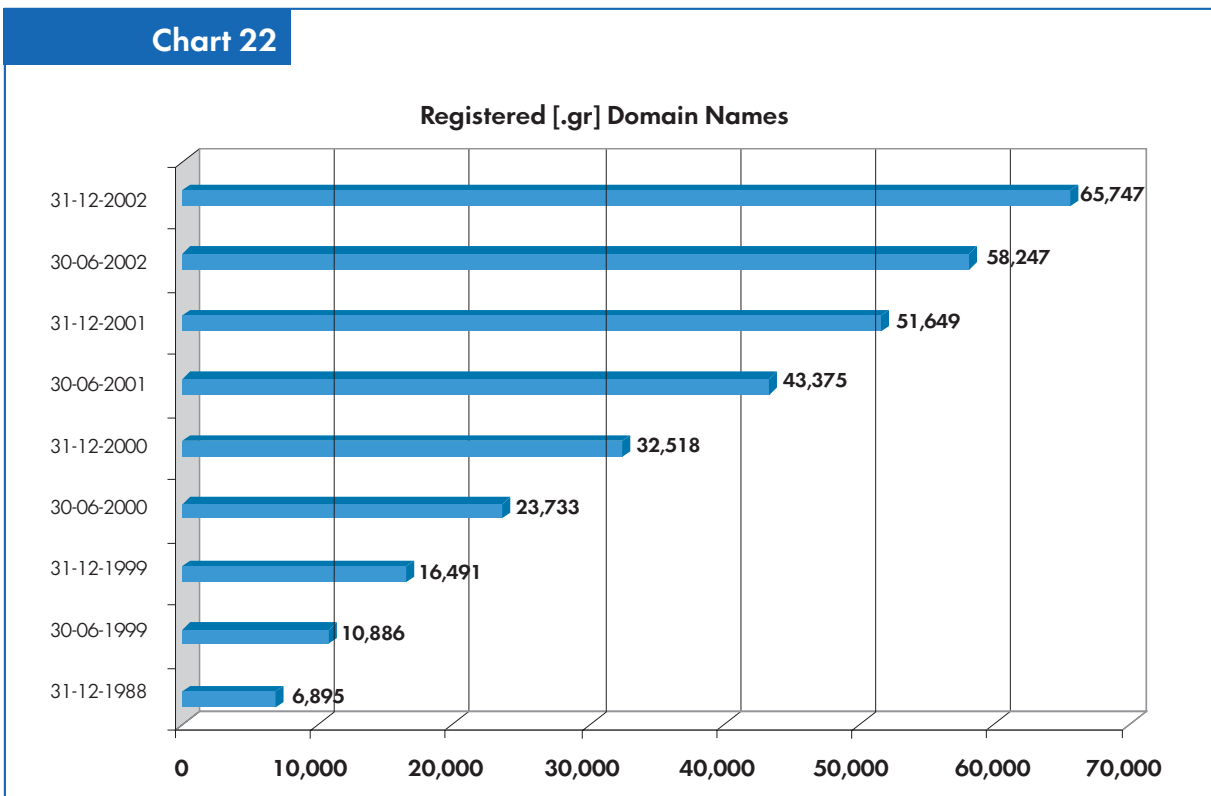
Source: Market Survey on behalf of GRNET

On the basis of the above estimates, Internet users as a percentage of computer users increased to

66.8% in September 2002, from 50% in mid-2001. The average number of Internet and computer usage hours in September 2002 is estimated at 6.3 and 14.2 hours/week, respectively.

The survey also reported that 8.3% of households stated their intention to buy a computer, and 8.4% of them stated their intention to acquire a connection to the Internet (which translate into 265,918 new computer purchases and 269,122 new connections). Based on the above, households owning both a computer and a connection to the Internet are expected to increase as a percentage of the households that only own a computer (this percentage is estimated at 45.9% for September 2002).

As shown in Chart 22, registered [.gr] Domain Names continued to increase in 2002, at an annual increase rate estimated at 27% at the year-end.



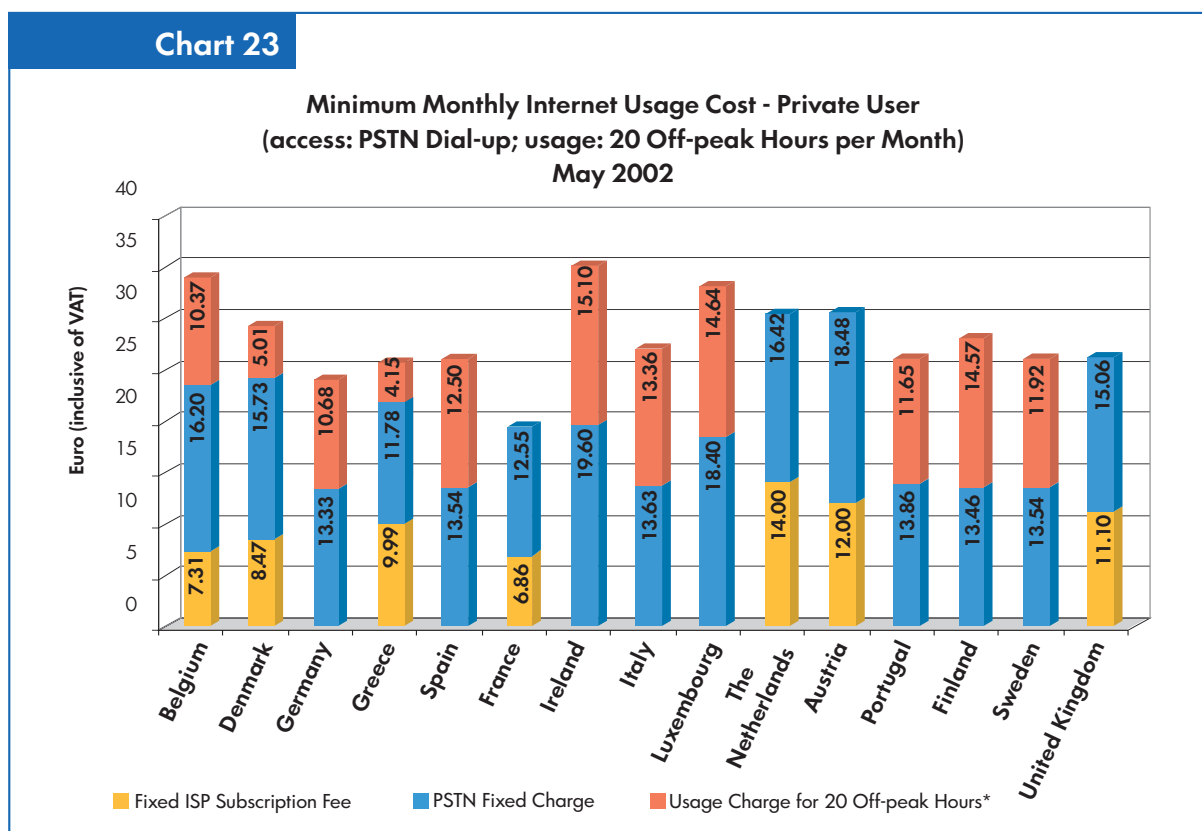
Source: Foundation for Research and Technology Hellas - Computer Science Institute (FORTH-ICS)⁶⁰ data.

⁶⁰ The Internet Domain Name Management unit (GR-Hostmaster) of the Computer Science Institute of the Foundation for Research and Technology Hellas is responsible for technical management of [.gr] Domain Names, under the supervision of EETT.



Chart 23 presents the minimum monthly expenditure for a residential Internet user (by member state), assuming use of a PSTN dial-up access and 20 off-peak Internet usage hours per month. The data are based on a survey conducted in May 2002 on behalf

of the European Commission, where the various packages offered by the large Internet Services Providers (ISPs) in each country were examined, and then the package which results in the minimum monthly expenditure for the user was chosen.



Source: 8th Report of the European Commission and EETT

* The "usage charge" refers to: (a) the charge for the PSTN calls made to access to the Internet; and (b) the charge (if any) applied by the ISP in connection with the time that the subscriber spends using the Internet. If the ISP offers free access time as part of the monthly subscription fee, then the "usage charge" paid by the subscriber refers only to the number of hours in excess of the free hours included in the monthly subscription.

It should be noted that for Greece the "usage charge" refers only to charges for calls made using Unified Panhellenic Call Number (EPAK) - Unified Regional Panhellenic Call Number (PEAK) numbers.

1.4. Consumer Rights and Benefits

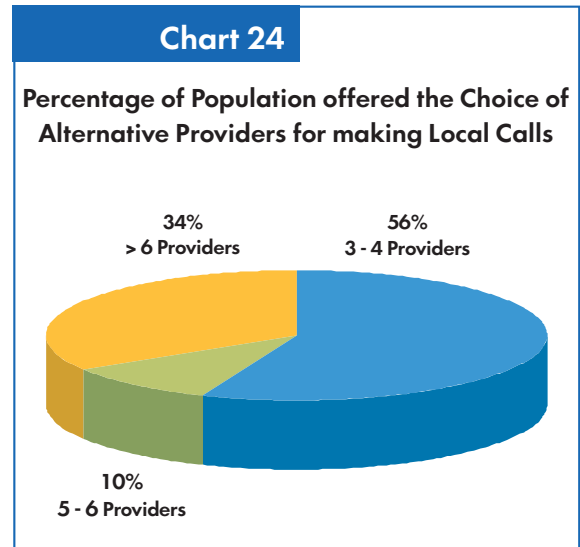
Expansion of the Range of Options Available

The full liberalisation of the telecommunications market and the abolition of its monopolistic features had immediate positive results for consumers, who have benefited significantly, while this trend is expected to continue. New companies offering conventional as well as cutting-edge services have entered the market, which is now fully open, while consumers have for the first time acquired full rights regarding the choice of provider in fixed voice telephony.

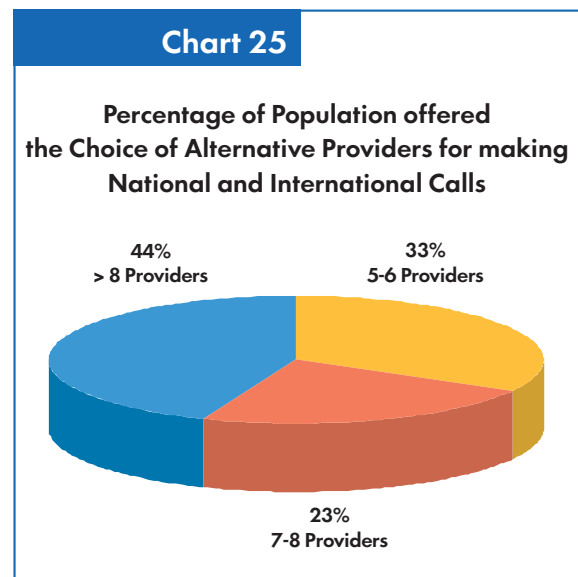
Existence of an adequate number of undertakings is a key precondition for the development of competition in telecommunications. In the last two years a large number of providers have launched their commercial operations, thus boosting competition considerably. In addition, the options available to consumers, in terms of choosing a telecommunications provider to handle their calls, as well as in terms of the services offered, have also increased.

A significant number of alternative fixed voice telephony providers started offering their services across the country, using mainly Carrier Selection⁶¹. In mid-2002, consumers had the following options available for local, national and international calls:

- For local calls, 56% of the population could choose between 3 or 4 new providers, 10% between 5 or 6, and 34% between more than 6 (Chart 24).



- For national and international calls, 33% of the population could choose between 5 or 6 new providers, 23% between 7 or 8, and 44% between more than 8 (Chart 25).



It should also be noted that as of mid-2002 Q-TELECOM, the fourth mobile telephony company, authorised in 2001, started to provide its services.

⁶¹ Carrier Selection is the capability offered to OTE subscribers to make calls via another provider, by dialing the special four - or five - digit Carrier Selection Code for that particular provider.



1.4.1. New Capabilities - Services

Carrier Pre-selection

The full liberalisation of telecommunications and the entry of new providers in the fixed voice telephony market offered users the possibility to choose, depending on their personal user profile and needs, between a large number of providers and services.

One such service offered is Carrier Pre-selection. This is the capability offered to OTE subscribers to choose on a permanent basis, if they so wish, the telecommunications provider to handle one or more categories of telephone calls (local, national, international and calls to mobiles), without the need to dial the four - or five - digit short code, as is the case with Carrier Selection.

For example, a subscriber can use Carrier Pre-Selection to make international calls through company A and national calls and calls to mobiles through company B, without having to dial, prior to making each call, the four - or five - digit Carrier Selection Code necessary for connecting to company A or company B.

In the framework of the introduction of Carrier Pre-Selection and Number Portability in the Greek market, EETT held a Public Consultation from 11 February to 12 March 2002. Participations included fixed and mobile telecommunications service providers as well as private users. For Carrier Pre-Selection, the purpose of the Consultation was to record the views of the parties concerned on the procedure for providing Pre-Selection and on all issues requiring regulation, in order for the regulatory framework for timely and efficient introduction of the service

to be determined at the next stage.

EETT then issued the Regulation⁶² on the introduction of Carrier Pre-Selection in the Greek market. According to the provisions of this Regulation, the service will be available to subscribers for the following categories of calls:

- Options 1:** International Calls
- Options 2:** National Calls and Calls to Mobiles
- Options 3:** International, Local and National Calls, and Calls to Mobiles

Option 1 is already available as of 1 December 2002. Options 2 and 3 will be available as of 1 February 2003.

Options 1 and 2 can be combined, so that users can pre-select the same provider, or different providers, for making national calls as well as calls to mobiles and international calls. Calls under categories, for which no Carrier Pre-selection has been requested by the subscriber, are handled by OTE. In addition, subscribers may cancel pre-selection for a particular call, by dialing, prior to making the call, the Carrier Selection Code of the provider - including OTE - through which they want to make that call.

Carrier Pre-selection is provided to subscribers through a one-stop procedure. Interested subscribers submit an application for Pre-selection to the operator of their choice, who then handles the request accordingly.

Given that it has proved very popular with subscribers in the other EU countries, Carrier Pre-selection is expected to also contribute significantly to boosting competition in the Greek telecommunications market during next year.

⁶² EETT Decision 254/70/2002, FEK Issue 773/B/21-06-2002.

Personal Numbers

Personal numbers are a new facility offered to the users of telecommunications services. A user can give to all persons who wish to call him/ her a single phone number to call. All personal numbers will begin with the digit 7.

Calls will be routed to the telephone number selected by the user (e.g. to the user's home number or mobile phone).

In this way, the subscriber of a personal number can:

- Give to all persons wishing to call him/ her a single number containing no location-specific information.
- Specify the times during the day and the corresponding numbers to which calls during such times will be routed in all cases.
- Select where calls are to be routed.

For example, the calls made to a subscriber's personal number (e.g.: 712 345 6789) can be forwarded to the user's office number during the morning, to the user's home number in the afternoon and to his/her mobile number in the evening, according to the user's instructions.

Provision of this facility is expected to be very popular with users, as it offers to them a tool that will significantly help them in their everyday life.

Itemized Billing

For users of voice telephony services, itemized billing is a basic tool enabling them to control the cost of the public telephone services they use. This facility provides users with detailed information on the charges they have to pay, while at the same time safeguarding their

interests. For this purpose, EETT issued a Decision⁶³ determining that all providers of fixed telephone networks and services are obliged to provide their users with a basic level of itemized billing free of charge. This basic level is provided at the subscriber's request and includes detailed information on the services billed, together with all subscriber discounts and other charges (connection charge, fixed charges etc.).

The information on the services billed consists of an analysis of the calls whose charges exceed 7.33 eurocents (exclusive of VAT). This analysis is given for all categories of calls and contains at least the following information:

- Number called.
- Date.
- Call start time.
- Call duration.
- Corresponding charge.

Itemized bills also contain aggregate information, such as total number, duration and charge for the other non-freephone calls for which itemized billing is not provided free of charge.

The number of subscribers requesting itemized billing is expected to increase during the next year.

Number Portability

Number portability is expected to contribute significantly to further boosting competition in the domestic telecommunications market during 2003, as it allows a subscriber to switch from one telecommunications provider to another while keeping the same telephone number. This facility applies to fixed and mobile telephony numbers, as well as to non-geographical numbers (i.e.

⁶³ EETT Decision 233/34/2001, FEK Issue 1501/B/08-11-2001.



numbers prefixed by 800, 801, 807 and 90).

Through the Public Consultation held in the period from 11 February to 12 March 2002 on the Introduction of Number Portability and Carrier Pre-selection in the Greek market, EETT invited views on Portability issues requiring regulation. The aim was to establish an appropriate regulatory framework for prompt and efficient introduction of this service.

EETT then issued a Regulation on the introduction of Number Portability in the Greek market. The Regulation provides for the introduction of the Number Portability facility as of 1 January 2003 for fixed telephony and non-geographical numbers, and as of 1 July 2003 for mobile telephony numbers.

Electronic Signature

Aiming to promote electronic transactions in Greece, while ensuring at the same time the protection of consumers, EETT laid the foundations for the use of Electronic Signature and for the development of the corresponding market.

Electronic transactions refer to the exchange of information and data of a binding nature for the transacting parties. Securing the reliability of such transactions involves the capability to determine and identify the source of the electronic information (i.e. the sender's identity) and to authenticate it, in a manner similar to a handwritten signature, which uniquely determines the identity of, and is binding on, the signatory.

These needs are addressed by the Electronic Signature, which represents a user's personal digital certificate and contains data in electronic format that are used for authenticating the information transmitted. Using Electronic Signature, consumers will be able to

conclude a number of transactions (such as banking transactions, purchases over the Internet, payments, transactions with public insurance funds, tax authorities etc.) with public -and private-sector entities, without the requirement to be present in person. In this way, the time-consuming procedures for handling handwritten applications, which involved several entities, will be replaced by swift and flexible electronic transactions free from the need for handwritten signatures and certifications. Under certain conditions, the use of Electronic Signature fulfils these requirements (see sub-section 1.1.7.).

EETT has established the necessary conditions that will allow provision of reliable Electronic Signature services and will help disseminate their use. Through a series of actions and interventions during 2002, EETT laid the foundations for stimulating and developing the corresponding market. These actions had multiple goals, and primarily addressed the following aspects:

1. Laying the foundations for the development of many new services, capable of supporting advanced and reliable electronic transactions, in line with the trend emerging in both the Greek and the European environment (e-government).
2. Facilitating long-term co-existence and interoperability of different infrastructures and technologies.
3. Contributing to the common effort, undertaken by various States and entities, to establish a common global basis for the use of Electronic Signature, through adoption and use of recognised standards and specifications.

Broadband Services

Broadband services are those that require high-speed data transmission, for example high-speed Internet access, video-on-demand, and videoconference.

Promotion of these services in the Greek market is one of EETT's top priorities.

Dissemination of broadband services requires the existence of competition in the access network: this ensures that consumers are provided with these services, and leads to improvements in their quality. Promotion of competition in the access network is achieved by granting to telecommunications operators more favourable terms for the provision of Leased Lines, by promoting OTE's LLU and its procedures for provision of ADSL access, as well as by introducing new access infrastructures and technologies (such as Fixed Wireless Access - FWA).

During 2003, particular emphasis will be placed on monitoring the progress made in the implementation of LLU, and on accelerating the procedures for the provision of ADSL access by OTE.

1.4.2. Universal Service

US is the provision of a set of basic telecommunications services that are provided to all citizens, regardless of geographic location and depending on local conditions, at an affordable price. In the framework of its responsibilities, EETT established the list of the parties under obligation to provide US, determined the minimum set of services and the technical features contained in the US, the costing principles that USPs must observe, and all other matters pertaining to the implementation of the US. It should be clarified that USPs are the entities (telecommunications undertakings) under obligation to provide the above services.

Following the relevant Public Consultation conducted in 2001, EETT issued in 2002 a Decision⁶⁴ determining the contents of the US. According to this Decision, the US includes:

1. Capability for connection to the fixed public telephone network.
2. Telephone directory enquiry service and telephone directories.
3. Installation of public pay telephones across the Greek territory.
4. Facilities for people with special needs.
5. Operator-assisted subscriber services.
6. Free access to emergency services using the single European emergency number "112" or other emergency numbers.

The EETT Decision lays down in detail the above provisions to the public and determines the obligations of the USP(s).

Telephone Directory Enquiry Service and Telephone Directories

Telephone directories will contain the fixed and mobile telephone numbers of the subscribers of all telecommunications operators in the country. The importance of telephone directories lies in the fact that, by using this service, consumers will be able to obtain the fixed or mobile number of a subscriber, regardless of the telecommunications operator to which the particular subscriber belongs.

Subscribers of other telecommunications operators will have the possibility to request non-disclosure of their telephone number to the USP.

Furthermore, the USP will provide at least one telephone directory enquiry service on a 24-hour basis to all users, including users of public pay phones. This service will cover the fixed and mobile telephone numbers of all telecommunications operators in the country. Mobile prepaid telephony subscribers wishing to be listed in telephone directories or in databases used to provide telephone directory enquiry services, should notify this in writing to their telecommunications operator.

⁶⁴ EETT Decision 255/83/2002, FEK Issue 874/B/12-07-2002.



Installation of Public Pay Telephones across the Greek Territory

The USP must install public pay phones, which will meet the reasonable needs of users in terms of both the number of inhabitants and of geographical coverage. Public pay phones must ensure that emergency calls can be made free of charge and without using coins or cards.

More in particular, the above-mentioned Decision specifies a population-based criterion, according to which the USP must ensure that by 2003 at least one public pay telephone per 300 inhabitants will be in operation. Most of these telephones will be card phones. Public pay phones must also be installed at selected busy locations (e.g. railway stations, post offices, rest areas on national roads), if no other service can be provided to the users at such locations.

Facilities for People with Special Needs

In providing the telecommunications services under the US, the USP must take into consideration issues concerning people with special needs.

More specifically, the USP must:

- ▶ Provide to last-stage renal patients up to 1,000 units of fixed telephony service per month free of charge, for a single connection.
- ▶ Offer a discount of 16 euro on the monthly bill for transmission services to blind people, deaf people, and people with a degree of disability higher than 67%, as well as to the families of persons with severe intellectual deficiency, paraplegics, quadriplegics or persons with cerebral palsy and a degree of disability higher than 67%.
- ▶ Offer to blind people and to people with severe sight impairments, the possibility to make up to 20 calls per month to the telephone directory enquiry service free of charge. Given the difficulties

involved in the use of telephone directories by blind people and people with severe sight impairments, and the financial burden that their dependence on the telephone directory enquiry service entails, this discount helps to place these people on an equal standing with the other users. The USP is under obligation to make available to blind people electronic telephone directories for residential numbers in text-only format, on CD-ROM, as well as through the USP website.

This measure is of practical use, given that graphics slow down the performance of the software that blind people and people with severe sight impairments use to consult electronic telephone directories.

- ▶ Provide, on a permanent basis, to people with special needs and to persons who would be vulnerable to the loss of a telephone connection (such as the elderly, heart patients, renal patients, etc.), and who are in arrears to the USP, the possibility to receive incoming calls and to call emergency numbers free of charge.
- ▶ Make available to persons with special needs terminal equipment for teletext application (easy-to-use device for people with sight impairments) or other special-purpose equipment at cost.
- ▶ Ensure that persons with special needs and persons, who would be vulnerable to the loss of telephone communication, are given priority regarding both connection and repair of their telephone connections.
- ▶ Provide the selective call barring service for outgoing calls free of charge to blind subscribers or to subscribers with severe sight impairments.
- ▶ Provide blind people or people with sight impairments, at their request, with alternative schemes that will help them obtain a basic level of itemized billing. In these particular cases, the basic level of itemized billing will include the following:
 - The called number.
 - The date on which the call was made.
 - The charge of the call.

- Ensure that 60% of the public pay telephones to be installed are configured in a way allowing access and use by wheelchair users.
- Obtain the prior written approval of EETT for removing public pay telephones from locations with a high circulation of people with special needs or of patients.

The aim of the above facilities is for the people mentioned above to be provided with access to the network and services of the USP, so that they may participate in economic and social life and in the technological advances taking place in the telecommunications market.

Resolution of Disputes concerning Payment of Bills

In cases where a telephone connection is temporarily discontinued due to the subscriber being in arrears, the USP is under obligation not to discontinue the provision of outgoing telephone communication for calls to emergency numbers. In addition, in cases involving the dispute of exorbitant bills for premium rate services (e.g. audiotext), subscribers must continue to enjoy access to basic telephone services until such dispute has been resolved.

The USP shall ensure that payment of the bills for services coming under the scope of the US is made using all suitable means. In cases of persons with special needs, it should be possible for them to pay the amounts due from their home.

Following a relevant request submitted by the subscriber, and provided that the technical capabilities exist, the USP will inform the subscriber on the amount of the telephone charges on a monthly basis.

Furthermore, the USP is under the obligation to meet the following quality performance levels:

- Time to provide an initial connection: 1 week for 95% of applications.
- Frequency of failures per 100 connections, per year: 13.5.
- Unsuccessful call ratio: 2%.
- Fault repair rate by the next working day: 85%.
- Response time for operator-assisted services: 20" (average response time).
- Response time for directory enquiry services: 15" (average response time).
- Percentage of public pay phones (coin-operated and card phones) in operation: 93%.
- Complaints regarding errors in bills: 0.2%.

1.4.3. Consumer Protection & Information - Issues regarding Transmitting/ Receiving Antenna Installations

Consumer Protection & Information

In exercising its regulatory role, EETT provides for smooth operation of the telecommunications market and observance of the legislation on telecommunications, with the overriding goal to protect the rights of consumers and safeguard their interests.

In this framework, EETT intervenes for the resolution of disputes arising between consumers and telecommunications undertakings or between telecommunications undertakings. EETT thus receives relevant requests and complaints, which it then investigates, intervening where needed in order to ensure that these are handled efficiently.

During 2002, a considerable number of requests/complaints were notified to EETT. Regarding consumers, the majority of their complaints concerned the charges billed or the conditions under which telecommunications services were provided



(e.g. exorbitant bills, discontinuation of connections, fixed charges). In the cases of complaints filed by telecommunications providers concerning potential violations of the provisions of the legislation in force and of the competition rules, EETT held Hearings and, in certain cases, imposed fines.

With the aim to establish a more effective management of, and provide a better service of, the requests/complaints submitted by consumers, EETT created in 2002 the Consumer Services Division, whose operation is expected to contribute to:

- Faster resolution of issues of concern to consumers.
- Establishing detailed records on the problems arising.
- The adoption of measures for improving the conditions under which services are provided.

In this framework, a Help Line (801 11000 80) was created, which users can call in order to submit enquiries or file complaints. A corresponding e-mail address is also in operation (katanalotes@eett.gr).

In the two months during which the Division has been operating, 341 calls were registered and 37 complaints were received in writing for resolution.

Issues regarding Transmitting/Receiving Antenna Installations

Mobile telephony systems require a dense network of base stations located within built-up areas, in order to guarantee reliable communications, using a clear signal free of interference or interruptions and, in parallel, serving the ever-increasing number of subscribers. For this reason, antenna mast constructions are installed on rooftops and within built-up areas.

It should be noted that the higher the number of antennas installed in a particular area, the lower the electromagnetic radiation by each antenna

and the overall radiation level in that area are.

Joint Ministerial Decision⁶⁵ (“Measures for protection of the public from the operation of land-based antenna installations”), has set clear conditions providing that, prior to the issue of each Licence for Mobile Telephony Antenna Mast Construction, the measures necessary for protection of the public are taken. Moreover, the Decision appoints the Hellenic Atomic Energy Commission as the authority responsible for protection of the general public from non-ionising radiations.

EETT, as the authority responsible for the development of telecommunications networks, fully respecting the rights of citizens and the environment, seeks to ensure strict observance of the legislation in force. To this end, in all cases EETT reviews in detail the supporting documents, required to ensure the above conditions, and intends to act as a liaison for cooperation between mobile telephony companies on the joint use of antennas, so that the number of antennas is reduced as far as possible.

During 2002, EETT received requests/complaints by citizens and other organisations concerning mobile telephony antenna mast constructions. More specifically, information were provided for 274 cases concerning antenna mast constructions, of which 130 had been illegally installed.

In cases of illegal constructions, EETT conducts the on-site inspections required and imposes the administrative penalties as stipulated by the legislation. After issuing the relevant Decision, EETT promptly informs the local Town Planning Department and Public Prosecutor’s Office, in order to secure removal of the illegal constructions and imposition of the criminal penalties, respectively, pursuant to the relevant provisions of Law 2801/2000. During 2002, EETT imposed administrative fines in some 60 cases of illegal mobile telephony antenna mast constructions.

⁶⁵ Joint Ministerial Decision No 53571/3839/2000, FEK Issue 1105/B/06-09-2000.

2. Actions to Promote a Competitive Market

2.1. Introduction

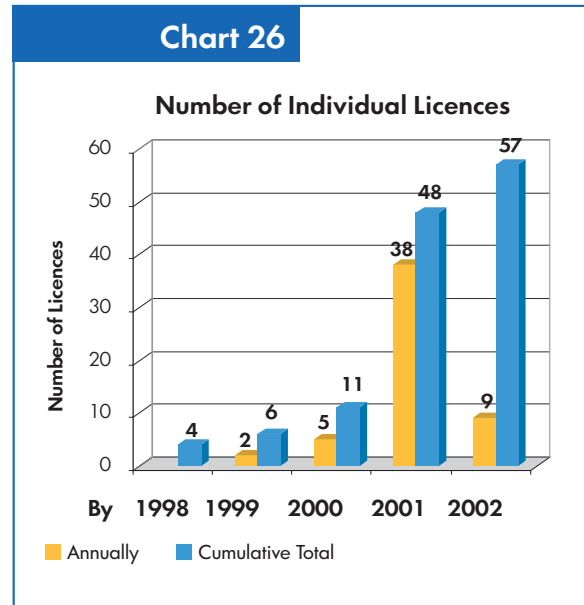
In line with the provisions of Law 2867/2000, and in the framework of its responsibility to regulate the telecommunications market, EETT places particular emphasis on the promotion of competition and on consumer protection in general. These objectives are attained through a series of interrelated actions for development of the market across all sectors, as these are specified in telecommunications. This section attempts to present a picture of those telecommunications market sectors, in which EETT has undertaken actions aimed at promoting and developing competition through relevant regulatory interventions, where this was judged necessary.

2.2. Increase in the Number of Telecommunications Providers

2.2.1. Licensing

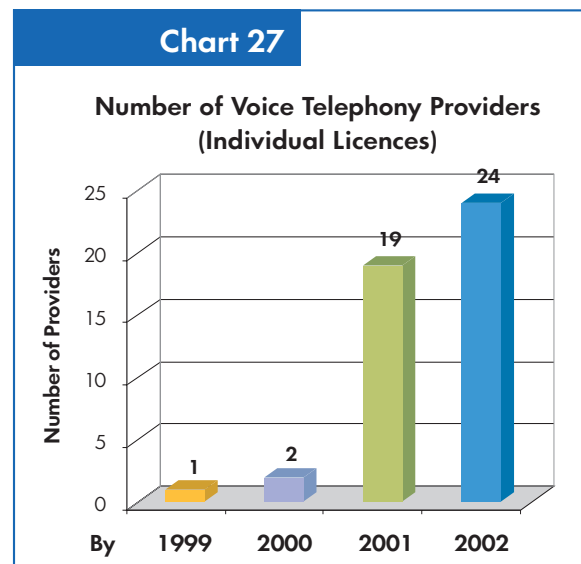
The number of new providers entering the market registered an increase in 2002, albeit at a less steep rate compared to 2001. More specifically, at the end of 2002 the total number of providers active in the market under Individual Licence status increased to 38. These providers hold a total of 57 Individual Licences in force, of which 9 (see Chart 26) were granted during 2002. Of these 9 licences, 4 were granted to undertakings, which had no previous Individual Licence.

It should be mentioned that providers requesting Modification of the Individual Licences that had



already been granted to them, in order to expand their networks, expressed a strong interest. During 2002 7 Individual Licences were modified.

The Charts below (Charts 27-28) present the market situation, as established at the year-end and against previous years, in two key areas: provision of fixed voice telephony and development of Local Access networks.



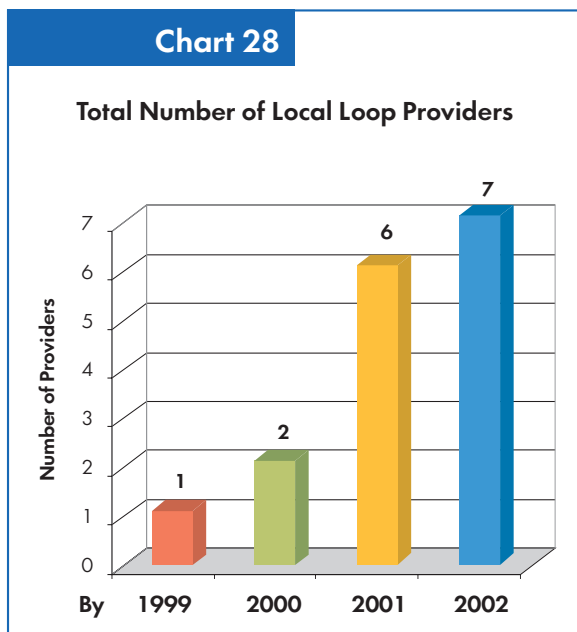


Table 4 presents the number of providers active in the market, grouped by type of activity. A detailed list of the telecommunications companies authorised under Individual Licence status, as at 31 December 2002, is given in Appendix III.

Table 4

Activity	Number of Providers
Voice Telephony and Fixed Network Development	13
Voice Telephony	11
Fixed Network Development	4
Satellite	11
2G Mobile Telephony	4
3G Mobile Telephony	3
TETRA	1
W-LAN	2

As regards Individual Licences, the number of authorised companies on 31 December 2002 fell to 235, compared to 251 at the end of 2001 (see Chart 29). This decrease was mainly a result of the change in the legislative framework, which came into effect in 2001. According to this

framework, telecommunications services resellers are not required to hold an Individual Licence. It should also be noted that a total of 19 Individual Licences were granted during 2002.

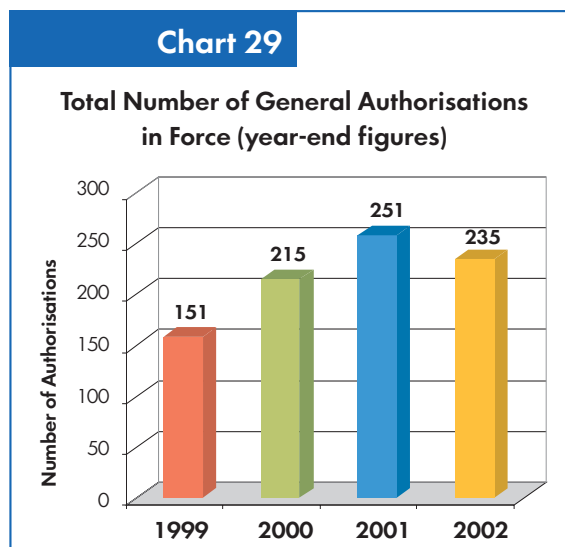
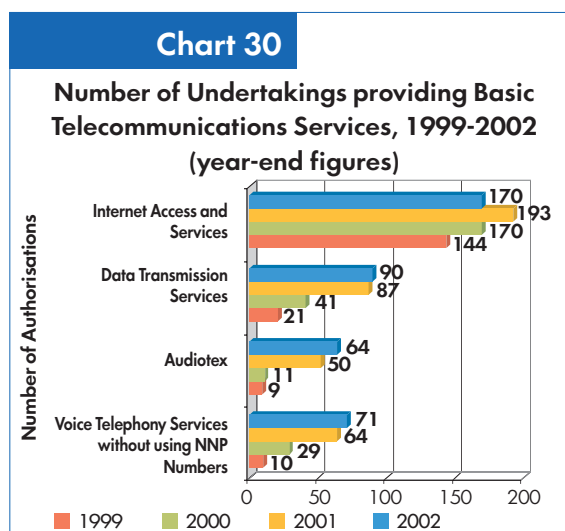


Chart 30 shows the breakdown of companies authorised under General Authorisation status across the main categories of telecommunications services provided. It should be noted that the Individual Licence held by one company might include provision of one or more telecommunications services.



A detailed list of the telecommunications companies authorised under General Authorisation status, as of 31 December 2002, is given in Appendix III.

2.2.2. Granting of Licences for TETRA Public Digital Mobile Services

TETRA (TErrestrial Trunked RAdio) is a relatively recent standardised wireless digital mobile communication system, through which voice and data services can be provided. It is primarily used for communications between independent user groups (e.g. motorists), and allows users to also call fixed or mobile telephone numbers. The digital technology used by the TETRA system allows the allocation of a specific number of radio frequencies, according to the requirements of users, thus contributing to optimised spectrum usage. At the same time, the system's digital technology ensures high-quality communication, reliability and enhanced security, through efficient use of encryption systems. TETRA networks have considerable advantages over analogue-based Private Mobile Radio (PMR) Networks, which today are commonly used in Greece for covering the above-mentioned needs.

EETT has launched the procedure for granting TETRA Licences in accordance with the following timetable:

Table 5	
Timing of the TETRA Licensing Procedure	
Public Consultation	21 September - 20 October 2001
Announcement of Public Consultation Results	28 November 2001
Publication of Information Memorandum	15 April 2002
Deadline for submission of remarks on the Information Memorandum	13 May 2002
Publication of Invitation to Tender	22 May 2002
Submission of Participation Files and Bids	25 June 2002
Licence granting procedure	4 July 2002
Granting of Licences	11 July 2002

Following the conclusion of the Public Consultation conducted by EETT in 2001, a relevant Recommendation was submitted to the Minister of Transportation and Communications. On 20 February 2002 a Ministerial Decision was published, setting down the procedure (auction) for granting two Licences with a duration of fifteen years.

EETT then published on 15 April 2002 the Information Memorandum, aimed at providing interested parties with key information on the procedure, the timetable, the number of licences to be granted and the conditions for participation, and invited submission of comments from interested parties on all the aforementioned issues. After taking into consideration the remarks submitted on 22 May 2002, EETT published the Invitation to Tender, which set the rules for conducting the auction, the conditions to be met by candidates, and the criteria based on which final selection of candidates for participation in the auction would take place.

The auction procedure followed was that of auction by multiple rounds using increasing bids. The licences to be granted were two TETRA National Individual Licences, with a 2x2 MHz bandwidth each, in the 411.75 - 415.75 MHz and 421.75 - 425.75 MHz spectrum bands.

- Licence I (A.I): 411.75 - 413.75 MHz and 421.75 - 423.75 MHz.
- Licence II (A.II): 413.75 - 415.75 MHz and 423.75 - 425.75 MHz.

The Opening Price for the auction was set at 3,000,000 euro. "Application for Participation" Files were submitted on 25 June 2002. An Application for Participation was submitted by OTE, with a bid price of 3,000,000 euro. After the File submitted was checked, approval of the participation of OTE in the auction was announced.



The auction was conducted at the offices of EETT, and was concluded on 4 July 2002 with the award of Licence II (413.75 - 415.75 MHz and 423.75 - 425.75 MHz) to OTE. The Individual Licence was granted to OTE at the time of payment of the auction proceeds (on 10 July 2002).

According to the terms of the Licence, operation of the network must take place by the end of 2005. OTE undertakes the obligation to install, operate and maintain the equipment necessary for the provision of services meeting the following requirements:

- ▶ Coverage of 85% of the course of main road arteries.
- ▶ Coverage of 75% of the course of secondary road arteries, as these are identified in the Invitation to Tender.

2.2.3. Allocation of EGSM Radio Frequency Spectrum

In accordance with European Standards and with the National Frequency Allocation Table (NFAT), the 885 - 890 MHz and 930 - 935 MHz spectrum band, also called EGSM (Extended-GSM) radio frequency spectrum, has been designated as an exclusive zone for provision of 2G Mobile Telephony services.

Following submission to EETT of a relevant request, and after an Opinion issued by the Secretariat General for Communications of the Ministry of Transportation and Communications, EETT proceeded to allocate the EGSM radio frequency spectrum, applying a procedure similar to that followed in July 2001 for granting 2G Mobile Communications Licences.

Allocation of the EGSM radio frequency spectrum by EETT in 2002 was conducted in accordance with the following timetable:

Table 6	
Timing of the EGSM Licensing Procedure	
Publication of Information Memorandum	27 May 2002
Deadline for submission of remarks on the Information Memorandum	14 June 2002
Publication of Invitation to Tender	21 June 2002
Submission of Participation Files	22 July 2002
Procedure for allocation of the EGSM Radio Frequency Spectrum	31 July 2002
Allocation of the EGSM Radio Frequency Spectrum	28 August 2002

More specifically, on 27 May 2002 EETT published the Information Memorandum, aimed at providing interested parties with key information on the procedure and the indicative timetable. In parallel, EETT gave to interested parties the opportunity to submit their comments and views. After taking into consideration the remarks submitted, on 21 June 2002 EETT published the Invitation to Tender, which set the rules for conducting the auction, the conditions to be met by candidates, and the criteria to be used for the final selection of candidates.

The procedure followed was that of auction by sealed bids, with each Bidder paying the price specified in its bid. The scope of the auction was the allocation of 2x5 MHz blocks in the EGSM (885 - 890 MHz and 930 - 935 MHz) radio frequency spectrum. The Opening Price for the auction was set at 38,158,000 euro.

Submission of "Application for Participation" Files took place on 22 July 2002. COSMOTE S.A. submitted an Application for Participation, with a bid price of 38,160,591 euro. Following the necessary check, participation of COSMOTE S.A. in the auction was announced on 30 July 2002.

The auction was conducted at the offices of EETT on 31 July 2002. The procedure was concluded on 28 August 2002 with the allocation to COSMOTE S.A. of the EGSM (885 - 890 MHz and 930 - 935 MHz) radio frequency spectrum, following payment of the auction proceeds by the company.

2.2.4. Auction Proceeds collected by the Hellenic State

Since late 2000, when the authority to issue Individual Licences was granted to EETT, four auctions have been conducted for granting Licences and one for the allocation of spectrum. More specifically, the auction for FWA Licences was conducted in 2000, the auctions for 2G and 3G Mobile Communications Licences were conducted in 2001, and the auctions for TETRA Licences and for allocation of EGSM spectrum, as mentioned above, were held in 2002. The procedures followed by EETT have resulted in auctions universally acknowledged to have been conducted in an impartial and efficient manner, and in the collection of considerable revenues by the State.

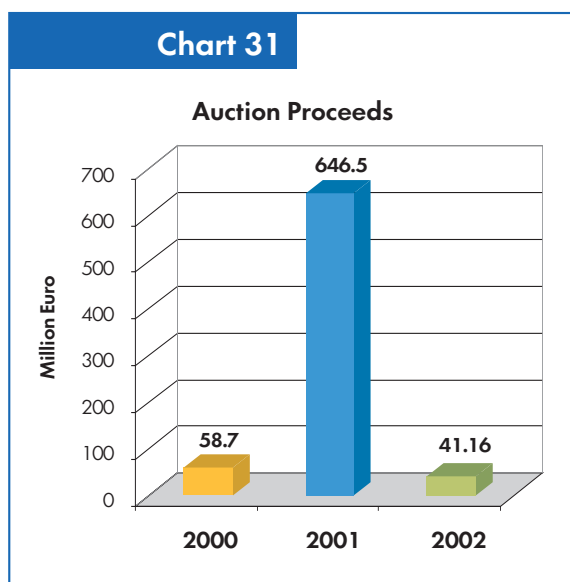


Chart 31 shows the proceeds from the Auctions conducted by EETT during the last three years, which have resulted to 746,360,000 euro of total revenues for the State.

2.3. Interconnection - Special Access

2.3.1. Local Loop Unbundling

Local Loop Unbundling (LLU) offers to telecommunications providers the opportunity to use the Local Loop of OTE in order to provide services to end-users. The Local Loop is defined as the cable network between the subscriber's terminal device and the nearest telecommunications exchange.

At the European Level, the legislative framework governing LLU is laid down by Regulation 2887/2000 of the European Parliament and of the Council of 18 December 2000. At the national level, this framework is determined by Law 2867/2000, and by the relevant EETT Decisions.

Within the above framework, EETT had approved in 2001 OTE's Offers on Fully Unbundled and Shared Access to the Local Loop, which laid the foundations for the conclusion of agreements between OTE and beneficiary providers. During 2002, EETT actions focused on issues concerning pricing of relevant services, clarification of the procedures for provision of LLU, and monitoring the progress made in its implementation. Specifically, EETT:

- Determined prices for all LLU⁶⁶ services. Implementation of both Fully Unbundled and Shared Access to the Local Loop requires transparency in the prices for the relevant services. Consequently, this intervention by EETT was considered necessary to ensure effective operation

⁶⁶ EETT Decision 253/87/2002, FEK Issue 720/B/13-06-2002.



of competition in the local access market and to stimulate competitive provision of electronic communications services.

- ▶ In cooperation with an independent auditor, reviewed all prices as proposed by OTE for LLU services, with the aim to investigate their cost-orientation. The audit is under completion, and the results are to be announced in early 2003.
- ▶ Developed and published flowcharts illustrating the procedure for LLU provision, with the aim to clarify this procedure and facilitate both OTE and the beneficiary telecommunications operators.
- ▶ Held joint meetings with participation by both beneficiaries and OTE, with the aim to identify problems relating to implementation and resolve them on the spot.
- ▶ Summoned OTE to a Hearing to investigate non-fulfilment of its obligations regarding LLU prices and the delays observed on the part of OTE concerning provision of LLU. The EETT Decision concerning this Hearing is to be announced in early 2003.
- ▶ Reviewed the draft contract proposed by OTE for conclusion of agreements for the provision of LLU to beneficiary telecommunications providers, and requested modifications to be made to it.

As regards the progress made in the implementation of LLU:

- ▶ OTE has concluded two agreements and four preliminary agreements with beneficiary telecommunications providers.
- ▶ These providers have installed equipment in 50 OTE exchanges (in the framework of either actual or remote co-location), while another 98 applications for co-location have been submitted.
- ▶ A total of 121 local loops are in operation, with applications pending for another 25.

Recognising the importance of LLU for the development of competition in the access network, EETT follows closely the progress made in its implementation, together with that in other issues of a

broader nature regarding the access network, by circulating special-purpose questionnaires to OTE and to the beneficiary telecommunications operators on a quarterly basis. In addition, EETT participates actively in meetings and activities of competent European bodies, such as the COMMunication COMmittee (COCOM) and the Independent Regulators Group (IRG), presenting proposals for a common approach to the relevant problems that other National Regulatory Authorities (NRAs) are also facing.

2.3.2. Interconnection

Ensuring interconnection of the networks of telecommunications providers is one of the primary conditions for smooth operation of the market and for stimulating its growth. Interconnection is defined as the physical and logical interconnection of two telecommunications networks, which allows users of the interconnected networks to communicate with each other, access all the services provided by these networks, and communicate with users of a third telecommunications network.

The legislative framework governing Interconnection in Greece is primarily regulated by Law 2867/2000, by Presidential Decree 165/1999, which was issued for the purposes of harmonisation with Directive 1997/33/EC, as well as by the relevant EETT Decisions.

The above legislative framework imposes on Operators with Significant Market Power (SMP) in Interconnection the obligation to publish and keep up-to-date a Reference Interconnection Offer (RIO). In the case of Greece, the SMP Operator in the corresponding market for 2002 was OTE. The RIO is used as the basis for negotiations for concluding an interconnection agreement with any beneficiary provider, and, prior to its application, is reviewed and approved by EETT.

In the framework of the above, OTE submitted to EETT the 2002 RIO in February 2002. After reviewing

it, EETT determined that the prices of the basic Interconnection services as included in the proposed RIO did not comply with the costing principles issued by EETT in 2001. Consequently, in order to ensure competition in the Interconnection market, EETT determined prices for the basic services in accordance with the Fully Distributed Cost (FDC) cost-accounting system, on the basis of a costing study conducted by an independent consulting firm. The prices determined are shown in Table 7.

Call Origination (eurocents/min.)			Call Termination (eurocents/min.)		
Local	Single Transit	Double Transit	Local	Single Transit	Double Transit
0.71	1.16	1.90	0.71	1.16	1.90

In parallel, EETT invited OTE to determine cost-oriented prices based on the Long-Run Average Incremental Cost (LRAIC) methodology. After that, by a new Decision issued in April 2002, EETT assigned to an independent auditor the task to audit the new prices proposed by OTE using the LRAIC methodology. Following the completion of the audit, EETT approved the 2002 RIO submitted.

The new prices for the basic Interconnection services are shown in Table 8 below:

Call Origination*			Call Termination*			Call Transit*	
Local	Single Transit	Double Transit	Local	Single Transit	Double Transit	Single Transit	Double Transit
0.655	1.116	2.590	0.655	1.116	2.590	0.620	0.955

* eurocents/min.

The key points of the above-mentioned EETT Decision, especially regarding the comparison of the 2002 RIO with previous RIOs, were the following:

- ▶ Clarification of the procedures for provision of services regarding international calls, call transit and calls using prepaid cards.
- ▶ Determination of tariffs and procedures for the freephone and onephone services of OTE.
- ▶ Detailed description of maintenance and cooperation procedures between the parties entering into Interconnection agreements.
- ▶ Introduction of call termination service to the network of alternative providers.
- ▶ Specific conditions for flow control and for ensuring the integrity of networks.
- ▶ Detailed description of procedures and implementation timetables for Interconnection requests.

Immediately after publication of the 2002 RIO, EETT initiated the review of the 2003 RIO. In November 2002, EETT held a Public Consultation inviting comments on OTE's approved 2002 RIO.

The most important issues raised were the following:

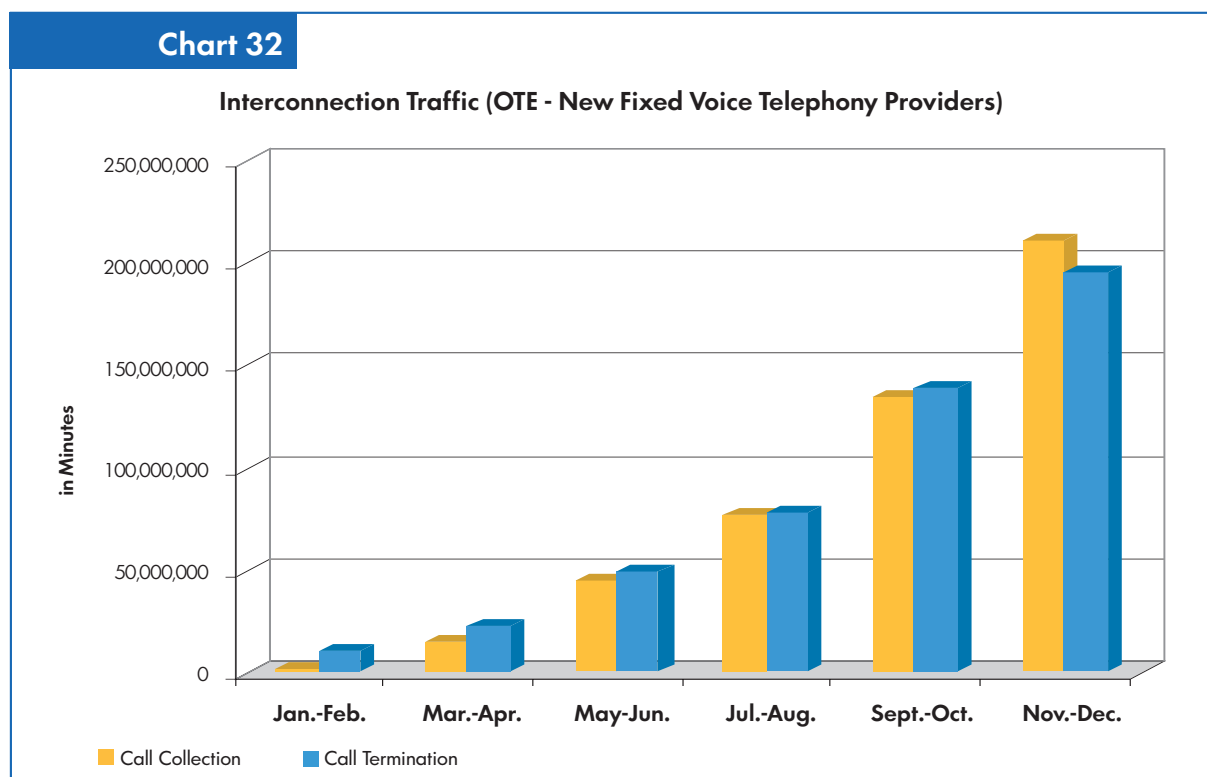
- ▶ Issues concerning interconnection of mobile telecommunications network providers with OTE's fixed telecommunications network.
- ▶ Allocation of Interconnection cost for Interconnection Links.
- ▶ Interconnection for provision of Internet access services.
- ▶ Interconnection and introduction of Number Portability/ Carrier Pre-selection.
- ▶ Interconnection and Short Message Service (SMS).



Sixteen telecommunications providers participated in the Public Consultation. The results are in the processing stage and are to be announced in early 2003.

The Interconnection agreements concluded between OTE and beneficiary providers are notified to EETT for review. According to the data made available up to 31 December 2002, 17 new fixed telephony providers had entered into Interconnection agreements with OTE, and at least 8 were already providing services to end-users.

In order to properly monitor the progress made in Interconnection, EETT regularly sends to providers interconnected with OTE relevant detailed questionnaires. Responses are collected and processed, with the aim to establish in detail the progress made in Interconnection. The Chart below shows Interconnection traffic between the network of OTE and the networks of the new fixed voice telephony providers (this is the traffic generated both by calls originating from OTE's network as well as by the termination of calls to it).



The increase in Interconnection traffic is also indicative of the progress made during 2002 in the implementation of Interconnection. Continuation of this smooth progress is one of EETT's principal goals for 2003.

On the basis of these, EETT's immediate actions will

focus on:

- Continuing to closely monitor the progress made in Interconnection.
- Completing the processing and publication of the Public Consultation results.
- Reviewing and approving the 2003 RIO, which OTE has already submitted.

2.3.3. Leased Lines

Leased Lines are among the most important telecommunications resources available for building, developing and exploiting telecommunications networks. They are used for connecting both the main components of a backbone telecommunications network, and the backbone itself with the network terminating points.

Given the importance of Leased Lines for new-entrants, and aiming at strengthening competition, during 2002 EETT undertook a number of actions, the most important of which were the following.

In response to the new Leased Line tariffs that OTE had proposed in November 2001, EETT, taking also into consideration the recommendation submitted by an independent auditor who had been assigned to audit these tariffs, determined, inter alia, that:

- OTE had not supplied sufficient justifications of the cost-orientation of the proposed tariffs.
- The tariffs proposed were to enter into effect as of 13 January 2002, but OTE was under the obligation to provide until 31 June 2002 all information necessary to justify the cost - orientation of these tariffs.
- OTE was to promptly establish cost-oriented tariffs for wholesale provision of Leased Lines.

In January 2002, EETT sent to OTE, among other things, proposals on improvements concerning the determination of cost-oriented tariffs for Leased Lines.

In April 2002, OTE was designated as SMP Operator in the market for Leased Lines, its most important obligation being to provide Leased Lines at cost-oriented prices, under conditions of

transparency, and fully respecting the principle of non-discriminatory treatment.

In parallel, by virtue of the Decision⁶⁷ issued in June 2002, EETT determined the obligations of SMP Operators in the market for Leased Lines. The most important provisions of this Decision were the following:

- SMP Operators must notify EETT a relevant Offer relating to the provision of wholesale Leased Line services (to telecommunications operators) and the provision of retail services. EETT reviews the Offer and proceeds to modifications when these are deemed necessary to ensure application of the provisions of the legislation in force, especially in relation to the principles of Open Network Provision (ONP) and of fair competition.
- Offers should at least contain information such as the ordering and delivery procedure (on the basis of a specific timetable), the duration of the agreement, and the procedures for failure notification, repairs, refund of charges paid and test measurements, as well as the technical specifications of Leased Lines.
- SMP Operators must keep statistical data concerning provision and repair of Leased Lines.

In the framework of the above-mentioned Decision, OTE submitted a relevant Offer, which was approved by EETT with modifications. In this way, the procedures for ordering, delivery and repair of Leased Lines were clarified, and clear timetables were set.

In July 2002, EETT summoned OTE to a Hearing to investigate non-fulfilment of its obligations deriving from the legislation in force, and concerning specifically the cost-oriented pricing of Leased Lines and the lack of tariffs for wholesale provision of Leased Lines (to telecommunications operators). Following the Hearing, in December 2002 EETT

⁶⁷ EETT Decision 255/84/2002, FEK Issue 810/B/28-06-2002.



determined that through its actions OTE continued to violate the provisions of the legislation in force and fined OTE 1,500,000 euro in total. OTE was called upon to refrain from all such actions in the future.

In parallel, several meetings were held at the EETT offices with representatives of telecommunications providers, in order to identify in detail the problems arising in the Greek market in connection with the provision of Leased Lines.

Future EETT actions will focus on the cost-oriented pricing of Leased Lines, and on monitoring the application of the framework mentioned above.

One further important development in 2002 was the approval by EETT of the introduction of Part Circuits in the Greek market. A Part Circuit is defined as a Leased Line with one terminating point located in the end-user's premises and the other in the premises of the telecommunications operator, and with a length not exceeding 5 kilometres.

Part Circuits will be provided to all authorised telecommunications providers wishing to obtain access to end-users, while the parties under obligation to provide Part Circuits are the SMP Operators in the market for Leased Lines. According to a relevant EETT Decision, for the period of time during which the costing system of the above operators shall not include the Part Circuit service, installation charges for Part Circuits shall be the same with those applicable under the tariffs for Leased Lines, while monthly rentals for Part Circuits are determined on the basis of the average price, as this results from the data contained in the 8th Report of the European Commission.

Introduction of Part Circuits is expected to contribute to the intensification of competition in

the access network between telecommunications undertakings.

2.3.4. Voice Telephony Tariffs

As SMP Operator in the voice telephony market, OTE is under the obligation to provide cost-oriented tariffs (i.e. tariffs calculated based on the costs of the corresponding service, including a reasonable rate of financial return) in connection with the provision of telephony services and Integrated Services Digital Network (ISDN) services.

In this framework, in January 2002 OTE proposed a reduction in call charge units for local calls (from 0.031 euro/min. to 0.026 euro/min.) and national calls (from 0.082 euro/min. to 0.063 euro/min.), and an increase in the monthly rental charge to 9.98 euro (from 8.22 euro). In addition, OTE proposed a reduction in the monthly rental charge for ISDN Basic Rate Access connections (from 17.6 euro to 13.2 euro). These tariffs were audited by EETT.

The tariffs were based on the EETT-approved methodology for the Operational Costing System (OCS) of OTE. This system follows the FDC costing standard using historic costs, and is used for calculating the cost of OTE retail services under regulation.

According to the results of this audit, which was conducted with the assistance of an independent auditor, the tariffs for conventional voice telephony and, more specifically, the monthly rental charge and the charge for local and national calls⁶⁸, were found to be cost-oriented and balanced. In contrast, the monthly rental charge billed for ISDN Basic Rate Access connections was not proven to be cost-oriented. EETT forwarded to OTE proposals for improvements, including, inter alia, proposals on the cost-oriented calculation of Basic and Primary Rate Access ISDN connections.

⁶⁸ For national calls where the calling party and the called party belong to primary exchanges in different prefectures and the distance between such primary exchanges is greater than 45 kilometres, the charging rate is 0.026 euro per 24.9 seconds.

2.3.5. Fixed-to-Mobile Call Termination

The termination charge is the price paid for each call by one telecommunications provider to another, in order for the calls made by the subscribers of the former to terminate in the network of the latter.

The telecommunications provider in whose network a call is terminating determines the amount of the termination charge, which is ultimately transferred to the subscriber of the telecommunications network from which that particular call originated.

In Europe, it has been calculated that the average peak-time charge for fixed-to-mobile call termination is several times higher than the average Interconnection charges for fixed-to-fixed calls. Indicative of this situation is the reference, made in the 7th Report of the European Commission, that "as regards mobile telephony, mobile-to-fixed and mobile-to-mobile prices have decreased in recent years, in contrast to fixed-to-mobile prices, which do not exhibit a significant change ..." in Greece. As a consequence, the problems created for new-entrant providers are insurmountable, while consumers are faced with high retail prices. Furthermore, according to the aforementioned Report, "... the peak time [call termination] charges in three member states (Greece, Italy and Portugal) are around twice as high as in the member state with the lowest tariffs (United Kingdom)."

In this framework, during the period from 24 December 2001 to 31 January 2002, EETT held a Public Consultation on the level of competition in fixed-to-mobile call termination, its impact in the development of telecommunications and the cost of the services provided.

Thirteen organisations participated in the Consultation and presented their views. The main conclusion reached was that, under current circumstances, the emergence of competitive pressures that would curb

or even reduce fixed-to-mobile termination charges is impossible. More specifically, because of the charges for call termination in mobile networks, fixed providers are forced to maintain high price levels for calls to mobiles, a fact that in many cases makes it impossible for new providers to enter the market.

Concerning the approach to address the issues arising, the majority of the participants agreed on the significance of the following points:

- The charge for call termination in a mobile network should not be differentiated depending on whether the originating network is a fixed or mobile one.
- Charges for call termination in mobile networks should under no circumstances be higher than the cheapest retail price offered by mobile telephony providers.
- It is absolutely necessary for EETT to proceed to regulatory action aimed at reducing charges for call termination to mobile networks, in order to reverse the climate of distortion of competition that prevails in the market and protect end-users.

As a first step, on 15 March 2002 EETT designated COSMOTE S.A. and VODAFONE-PANAFON as SMP Operators in the market for public networks and mobile telephony services. These two Operators must assume and fulfil all relevant obligations, pursuant to the provisions of Greek and European legislation.

This Decision by EETT was aimed at remedying a number of distortions caused by the lack of competition in calls originating from fixed networks and terminating in mobile telephony networks.

In parallel, EETT conducted an open public tender procedure for appointment of a contractor to conduct a study on the assessment of the level of competition in the particular market, as this is defined in the relevant European Commission Recommendation⁶⁹, so that EETT may proceed to

⁶⁹ Commission Recommendation 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.



the necessary regulatory interventions where necessary.

2.4. National Numbering Plan

Within the framework of completing the introduction of the new National Numbering Plan (NNP), the change in the dialing scheme for fixed numbers was successfully implemented on 20 January and 3 November 2002.

The new NNP serves as a tool for development and has a crucial role in establishing a modern telecommunications environment in Greece. Its introduction was necessitated by the fact that the previous system could not sufficiently meet the increasing needs of the fully liberalised telecommunications market, which result from the increase in the number of providers entering the market, and from the introduction of new services and the expansion of the existing ones.

The new numbering plan:

- ▶ Provides all interested parties with access to numbering resources, ensuring conditions of fair competition between telecommunications providers.
- ▶ Provides room for more numbers, resulting in the availability of numbering capacity on a long-term basis.
- ▶ Allows the provision of new services.
- ▶ Facilitates entry of new telecommunications providers in the market.
- ▶ Is harmonised with the recommendations and standards of international organisations and consistent with European practice.
- ▶ Is user-friendly, given that the first digit of the numbers indicates to the caller the type of service as well as the type of charge applying, as shown in Table 9.

National Numbering Plan	
First Digit	Category of Numbers
1	Short Codes and Carrier Selection Codes
2	Fixed telephony numbers
3,4	Numbers reserved to cover future needs
5	Corporate numbers
6	Mobile telephony numbers
7	Personal numbers
8	Special (reduced) rate numbers
9	Premium rate numbers
00	International dialing prefix

The new NNP is a closed ten-digit system. Its application began on 8 July 2001, with the introduction of the new dialing scheme for fixed numbers, with the new and old systems operating in parallel until 20 January 2002, when the old system was discontinued. This six-month period of parallel operation was considered necessary for the familiarisation of users with the new NNP and for their preparation in view of its exclusive application in 2002. The last change in the dialing scheme for fixed numbers took place on 3 November 2002, with "0" substituted by "2" as the first digit.

Successful implementation of the new NNP was due to prompt and appropriate advance planning, and to good preparations on the part of telecommunications providers. Despite its scale and technical requirements, the new NNP was implemented by all telecommunications providers consistently and efficiently, resulting in to a complete absence of problems for citizens.

Moreover, the extensive information campaign conducted by EETT during all stages in the transition from the old numbering plan to the new one, contributed significantly to the smooth adaptation of citizens to the new dialing scheme. It should be noted that, in the case of the change that took place on 3 November 2002, on the tenth day after the change, the calls made using the old dialing scheme were a mere 1.5% of the total calls made: these calls were redirected to a recorded announcement service, and continued to exhibit a falling trend during the first month after the change.

The last stage in the introduction of the new NNP will be completed on 19 January 2003, when the first digit of mobile phone numbers will be changed from "0" to "6".

The Table below shows the fees collected by EETT during 2002 from allocation, usage and reservation of numbers under the NNP.

Table 10 Fees for Allocation, Usage and Reservation of Numbers (in euro)		
Allocation Fees	Usage Fees	Reservation Fees
780,585	3,724,862.50	372,012.50

2.5. Radio Spectrum Management

The radio frequency spectrum allows transmission of information between two locations without the need for a physical wire connection between them. In more technical terms, the radio frequency spectrum consists of electromagnetic waves, such as the sunlight, infrared and ultraviolet rays etc. Television sets, radios and mobile phones communicate through such electromagnetic waves, which are

transmitted between a transmitting antenna and a receiving antenna. A necessary condition for communication between two wireless devices is that they are "tuned" to the same frequency (or to the same channel). By tuning a device to a particular frequency, we are able to receive signals that contain information - such as, for example, a radio station's broadcast.

The radio frequency spectrum is a significant national resource that plays an important part in the development of sectors of the economy, such as telecommunications, transport, and research and development. It is divided into frequency bands, which define the range of frequencies within which specific radio communication services operate. The available spectrum, i.e. all the frequencies that can be made available in a particular geographical area for the operation of radio communication stations, is finite. Consequently, its designation as a scarce resource results from the fact that the finite number of radio frequencies places a limitation on the number of stations that can operate in a geographical area, and thus restricts the development of wireless networks. For this reason, the manner in which the radio spectrum is made available is particularly important.

It is indicative of the importance of this matter that in the EU a number of spectrum management organisations have been created, such as the European Conference of Postal and Telecommunications Administrations (Conférence Européenne des Postes et Télécommunications - CEPT), in which 45 European countries are represented through their respective national delegations, aim at formulating the spectrum management policy at the European level.

The manner in which the radio frequency spectrum is made available and the terms of its usage are constantly evolving, as a result of technological advances and of market regulation. New commercial networks based on wireless



technologies are developing rapidly, such as mobile telephony networks and broadband satellite networks that combine telephony, data transmission, Internet applications, location finding and telemetry functionalities and other services, and provide new value-added services. The introduction of these services in a market results in economic growth and creates new jobs.

EETT, as the authority responsible for spectrum management in Greece, recognising the significance of this scarce resource and its vital importance for the growth of the telecommunications market, focused its activities during 2002 on the improvement of the National Radio Frequencies Registry (NRFR) quality and on the organisation and institution of specific procedures for every individual operation regarding radio frequency spectrum management.

In this framework, since the beginning of 2002 EETT:

- Has improved frequency assignment procedures.
- Has processed the majority of pending applications concerning Licences for Antenna Mast Constructions.
- Has drafted model application forms, and accompanying instructions for completion, for all types of licences or approvals related to spectrum usage, and made them available on the EETT website⁷⁰.
- Has sent circulars to the Public bodies involved in the licensing procedure (such as Prefectural Authorities).
- Has procured special fixed and portable equipment for performing frequency measurements allowing tracing of illegal use of frequencies (see sub-section 2.6.1.).
- Has conducted on-site inspections in facilities of illegally transmitting stations, imposing fines and confiscating equipment (see sub-sections 2.6.4., 2.6.5. and 2.6.6.).

- Has published an Invitation to Tender, and has conducted the relevant procedure, for procurement of the National Spectrum Management and Monitoring System - NSMMS (see sub-section 2.8.).

Furthermore, a specialist consultant has been assigned the task to review the organisational structure of the Spectrum Department, taking also into consideration the new EU Regulatory Framework, and propose new regulations and procedures, together with improvements in the existing ones, aimed at a more efficient spectrum usage and at facilitating spectrum users.

2.5.1. Frequency Assignments

The sub-sections that follow present an account of EETT actions concerning spectrum management, in connection with the three most important categories of wireless networks, namely:

- Terrestrial Microwave "Point-to-Point" Link Networks.
- Fixed Satellite Services Networks.
- PMR Networks.

Table 11

**Number of Radio Frequencies Assigned
(01-01-2002 - 31-12-2002)**

Fixed satellite service	67
Fixed "Point-to Point" service	8,320
Land Mobile service - Private Mobile Radio (PMR) Networks	103

Terrestrial Microwave "Point-to-Point" Link Networks

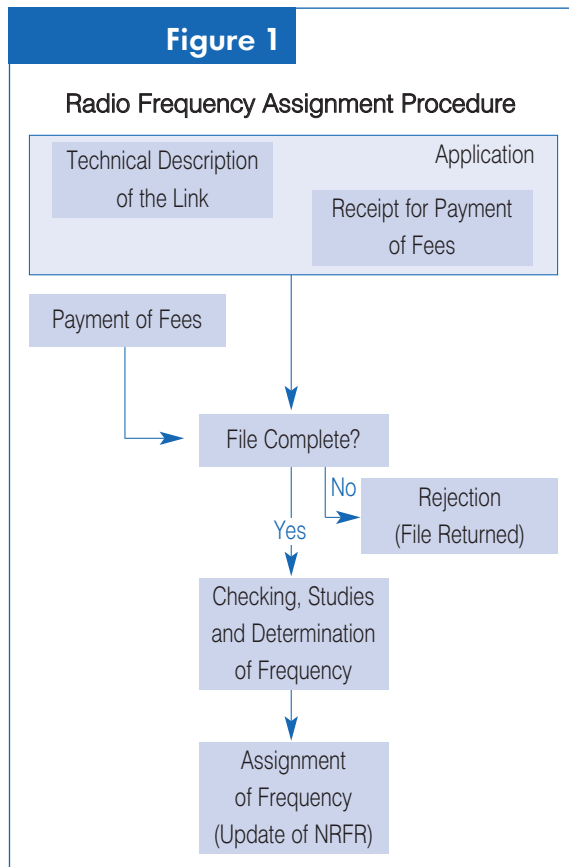
Terrestrial Microwave "Point-to-Point" Link Networks are composed of fixed radio stations that communicate between them through high-frequency

⁷⁰ <http://www.eett.gr>, Subject Area "Telecommunications/ Wireless Communications/Assignment of Radio Frequencies".

wireless links. These networks play an important part in the liberalisation of the telecommunications market, as they offer to new-entrants the opportunity to deploy, within a short period of time and at a relatively low cost, backbone telecommunications networks that are alternative to those of incumbent providers, which usually use wire links to connect their network nodes.

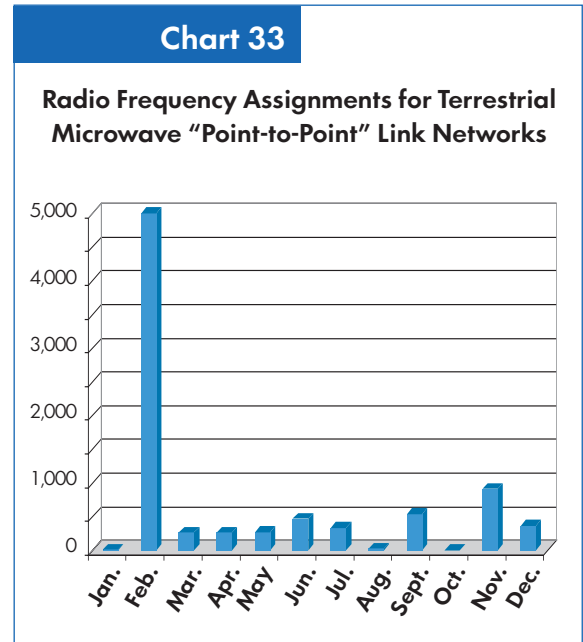
Radio Frequency Assignment Procedure

The procedure followed for assignment of radio frequencies is summarised in the Figure below.



Assignments during 2002

Chart 33 shows the Radio Frequency Assignments for Terrestrial Microwave “Point-to-Point” Link Networks that took place during 2002.



A total of 8,320 channels for “Point-to-Point” links were assigned in 2002, corresponding to the total number of applications submitted during the year. These mainly concerned networks of companies providing telecommunications services to the public.

Fixed Satellite Services

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

Radio Frequency Assignment Procedure

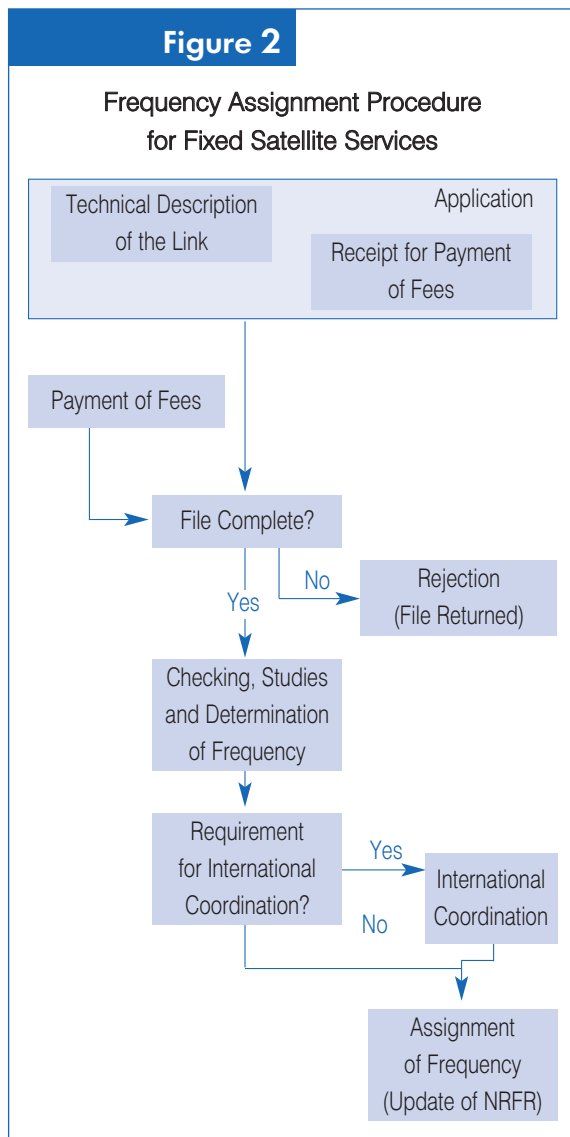
Installation and operation of terrestrial satellite stations require procedures for national and international coordination with existing national and international wireless networks (satellite and terrestrial ones). EETT has developed model application forms⁷¹, together

⁷¹ “Application for Assignment or Modification of Fixed, Temporary or Transportable Satellite Earth Station Radio Frequencies” and “Application for Assignment or Modification of VSAT System Radio Frequencies”.



with corresponding instructions for their completion, which are available on the EETT website⁷².

The procedure followed for assignment of radio frequencies is summarised in the Figure below.



Radio Frequency Assignments during 2002

A total of 67 channels were assigned to terrestrial satellite stations, corresponding to the total number of applications submitted during the year. These mainly concerned networks of companies providing telecommunications services to the public.

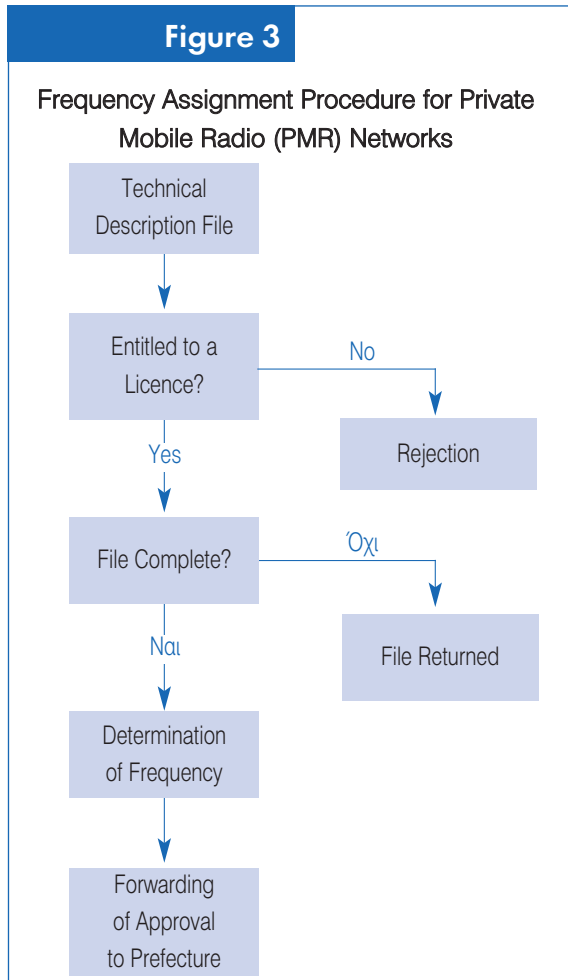
Private Mobile Radio (PMR) Networks

The term “Private Mobile Radio (PMR) Networks” is used to describe the radio networks of land mobile service used to meet the communication needs of various professional groups and emergency services. Examples of such networks are the communications networks used by radio-taxis and transportation companies, as well as emergency networks such as those used by the Fire Brigade, the National First Aid Centre etc. These networks are intended exclusively for private use, and thus their commercial exploitation is prohibited, as also is their connection to the public telecommunications network.

Radio Frequency Assignment Procedure

Operating licences for PMR Networks are issued by the Prefectural Authority, following a concurring opinion by EETT, which grants use of the corresponding operating frequency. Licences are valid for three years as of their date of issue. The procedure followed for assignment of radio frequencies is summarised in the Figure 3.

⁷² <http://www.eett.gr>, Subject Area “Telecommunications/ Wireless Communications/Assignment of Radio Frequencies”.



Radio Frequency Assignments during 2002

In order to improve and accelerate the licensing procedure for PMR Networks, EETT drafted a model Licence application, together with instructions for its completion. The above, together with circulars on the procedures to be followed on all matters related to PMR Networks, were sent to all Prefectural Authorities in Greece, for information purposes⁷³.

Radio Frequency Assignments during 2002

During 2002, all applications concerning networks with local and regional coverage were processed. The Table below summarises the status in the licensing of PMR Networks in 2002.

Table 12

Number of Radio Frequencies Assigned for Private Mobile Radio (PMR) Networks (01-01-2002 - 31-12-2002)

2002	Total	Approved	Rejected	File Returned	Pending
Applications requesting assignment	156	103	5	48	-

Infrastructure - Tools

The basic tool for spectrum management is the NRFR, which is the record of all frequencies used in Greece. In accordance with Law 2867/2000, EETT is the authority having sole responsibility for maintaining and updating the NRFR. Moreover, all State entities using frequencies are under the obligation to inform EETT, in order for the corresponding information to be entered in the NRFR.

Given the importance of the NRFR for spectrum management, EETT undertakes actions necessary for upgrading and continuously updating the NRFR with full and reliable data. As a result of coordinated efforts, in 2002 the Prefectural Authorities forwarded to EETT all Licences for PMR Networks, so that the NRFR could be brought up to date.

The NRFR is the basic module of the Information Technology (IT) infrastructure for spectrum management, which comprises a set of interrelated

⁷³ The relevant information is also available from the EETT website (<http://www.eett.gr>, Subject Area "Telecommunications/ Wireless Communications/ Licences for Private Mobile Radio Networks").



software applications and a central database that operate as a uniform integrated system. The system is capable of adapting to the needs of EETT and to potential changes in the licensing and frequency assignment procedures.

The above applications offer to EETT personnel the capability to know at any given time the frequencies in use in each area and those that are available for assignment. They also represent a useful tool for spectrum management, for use in monitoring illegal use of frequencies by geographical area.

2.5.2. Spectrum Pricing Policy

At the European and international level, radio spectrum users pay special fees - the so-called "radio frequency spectrum fees" - for using the radio frequency spectrum. Imposition of fees acts as an incentive for a more efficient spectrum utilisation by users, and guarantees the operation of the mechanism, which ensures proper use of the radio frequency spectrum and monitors broadcasts for conformity with the law and protection from interference.

Traditionally, these fees were of an exclusively compensatory nature. However, spectrum usage is increasingly intensified in modern telecommunications markets. There is increased demand for allocation of spectrum blocks in specific geographical areas, to serve the provision of new advanced services with high added value. This demand, combined with the fact that the radio frequency spectrum is a scarce national resource, has forced NRAs, which are responsible for spectrum monitoring and management, to re-evaluate pricing approaches and policies.

The EU has determined the key policy principles that must govern spectrum pricing, through a series of legislative texts. These policy principles refer to:

- Non-discriminatory treatment of all interested parties.
- Implementation of the procedure in accordance with the principles of transparency, proportionality and impartiality.
- Pricing in accordance with the value of the spectrum.
- Creation of incentives for technological development and innovation.

In 2002 EETT conducted a tender procedure for awarding a study on the pricing of the radio frequency spectrum, in compliance with the above principles, the European experience and the needs of the Greek market. This study has been included for funding by the Operational Programme "Information Society" (OPIS) under the 3rd Community Support Framework (CSF III). In 2003, EETT will evaluate this study and will modify the existing Regulation⁷⁴ as required.

The fees collected by EETT during 2002 were as follows:

Spectrum Usage Fees	Assignment Fees	Operating Fees for Private Mobile Radio (PMR) Networks
14,430,157.70 euro	600,681.55 euro	244,307.99 euro

2.5.3. Development of Wireless Network Infrastructures

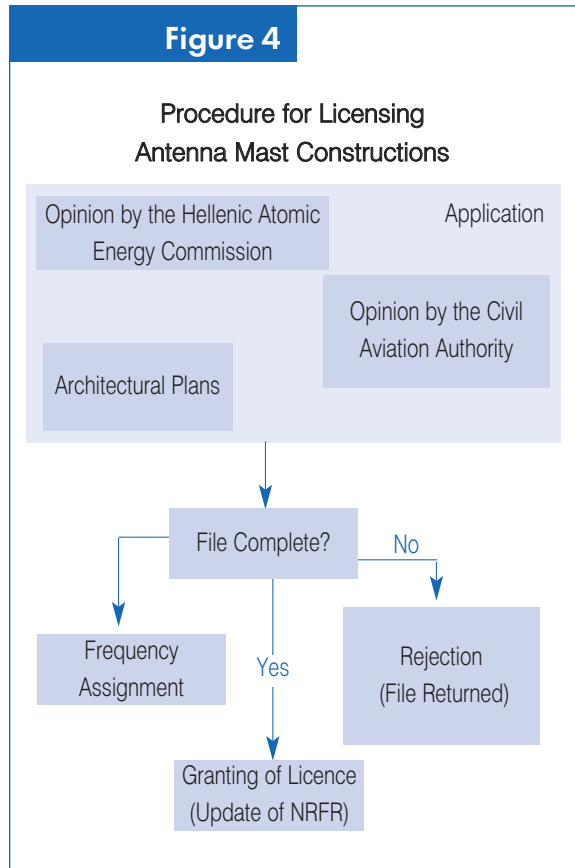
Wireless networks consisting of antenna mast constructions play an important part in the liberalisation of telecommunications market, as they offer to new entrants the opportunity to deploy, within a short period of time and at a relatively low cost, backbone telecommunications networks that are alternative to those of incumbent providers.

⁷⁴ FEK Issue 351/B/30-03-2001.

As provided by Law 2867/2000, the review of requests for Antenna Mast Constructions Licences comes under the responsibility of EETT. According to Law 2801/2000, the installation and operation of every transmitting/receiving antenna requires (with the exception of special cases) issuance of a licence, followed by the approval of the competent Town Planning Department. EETT also follows strict procedures for reviewing the licences submitted by companies, in order to ensure protection of citizens' health and safety in air navigation activities, as stipulated by the legislation. Issuance of every licence presupposes the concurring opinion of the Hellenic Atomic Energy Commission on radiation levels, and the approval of the height of the construction by the Civil Aviation Authority.

During 2002, EETT applied the Regulation on Licences for Antenna Mast Constructions⁷⁵, which was issued in late 2001, and introduced more flexible procedures for reviewing and processing licensing requests, which led to shorter times required to issue the licences. Facilitation of new providers in deploying their infrastructure and in building up their market activities was among EETT's aims. The average time for issuing an antenna mast construction licence was reduced to 30 days for an application meeting all requirements, while rejected applications are accompanied by full reasoning, allowing companies to promptly amend their applications and faster processing of re-submitted applications. Application of flexible procedures is significant in view of the future needs arising in connection with the introduction of new networks (such as 3G Mobile Telephony), which necessitates the development of new wireless networks infrastructures.

Antenna Licensing Procedure

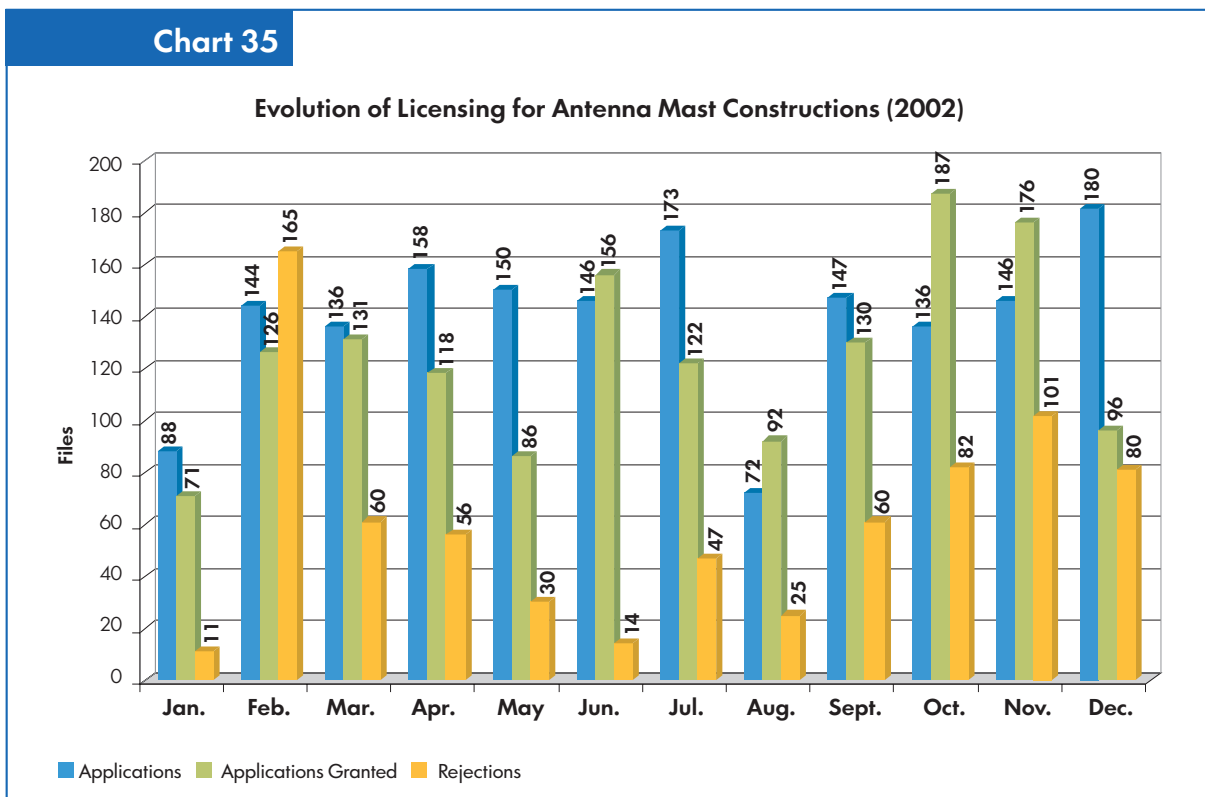
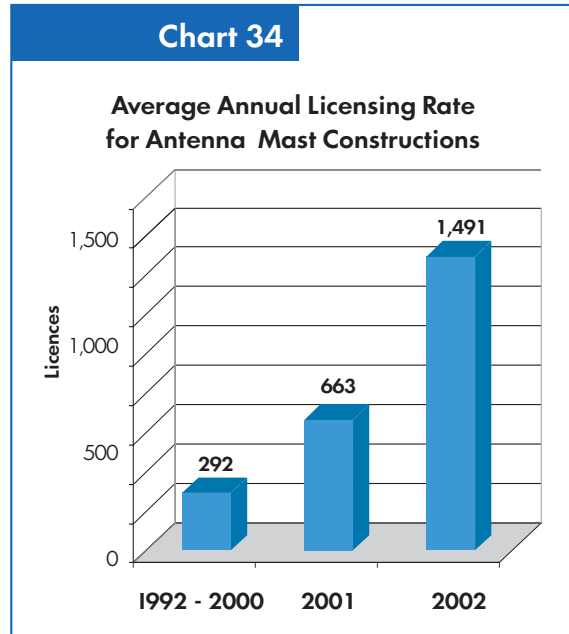


During 2002, EETT continued the licensing procedures for new mobile telephony antenna mast constructions of the three providers already in place prior to 2002 (VODAFONE-PANAFON, STET HELLAS S.A., COSMOTE S.A.), as well as of the new entrant (Q-TELECOM). In addition, EETT issued licences for constructions supporting the development of new alternative wireless network backbone and local access infrastructures, and the provision of the fixed voice telephony and Internet access services offered by the new providers.

⁷⁵ EETT Decision 236/79/2001, FEK Issue 1649/B/11-12-2001.



During 2002, a total of 1,676 new applications were submitted to EETT, in addition to 920 applications pending in late 2001. The majority of these applications was processed (1,491 Licences were granted and 731 applications were rejected).



The Table below presents the breakdown of the Antenna Mast Construction Licences granted by EETT in 2002.

Table 13	
Breakdown of Antenna Mast Construction Licences (2002)	
	Number of Licences
Mobile Telephony Network	1,379
Fixed Wireless Access Network	84
Wireless Backbone Network	28

All information concerning licensed antenna mast constructions are kept in the National Antenna Systems Registry, which EETT maintains and updates regularly, with the purpose of providing to all interested parties prompt information concerning antenna mast constructions and compliance with the conditions provided for by the legislation on telecommunications.

2.6. Spectrum Monitoring

Operation of an effective mechanism for controlling and monitoring radio frequency spectrum usage is a prerequisite for rational management of this scarce resource. To this end, acting within its jurisdiction, EETT:

- Locates and eliminates illegal transmissions, aiming to restrict spectrum usage only to authorised users.
- Deals with harmful interference affecting legitimate users of the radio frequency spectrum, with the aim to protect them from interference-related problems.
- Checks the technical specifications of legitimate broadcasting stations against those stated in their Licences, to ensure - inter alia - protection of citizens from uncontrolled broadcasts that

might entail health hazards.

- Checks the application of the relevant regulations and terms under which the licences for the use of radio frequencies are granted, with the aim to create and ensure conditions of fair competition.
- Systematically records spectrum usage and draws conclusions of a statistical nature, such as the availability of frequency bands, with the purpose to facilitate the decision-making process concerning more efficient spectrum management.
- Imposes penalties to those in violation of the legislation and regulations in force.

The priorities established by EETT regarding inspections, either on its own initiative or based on the complaints that it receives, are the following:

- Protection of high-priority networks - e.g. the frequencies used for Air Navigation, the Armed Forces, the Police and Fire Brigade (see sub-section 2.6.4.).
- Protection of citizens from uncontrolled broadcasts.
- Protection of legitimate spectrum users (e.g. telecommunications providers) from harmful interference.

In order to successfully respond to the above tasks and priorities, in 2002 EETT took actions necessary to secure the required technical and human resources.

2.6.1. Procurement of Technical Equipment

2.6.1.1. Equipment of Fixed Monitoring Stations

In order to meet the immediate needs for radio spectrum control and monitoring in the Attica region, EETT in 2001 launched the procedures for procurement of equipment for two Fixed Monitoring Stations (FMSs). These procedures were concluded in early 2002, and the two



Stations were installed at the offices of EETT in Maroussi and in a building inside the Athens International Airport (AIA).

The Maroussi FMS includes a receiver and monitoring antennas allowing control of the 20 MHz - 3 GHz frequency band, with the corresponding equipment of the AIA FMS covering the 20 MHz - 1.3 GHz band. A Control Centre, located at EETT premises, controls the two Stations, via appropriate networking.

The above equipment conforms with modern spectrum monitoring technology, allowing highly accurate measurements to be performed in accordance with the recommendations of the International Telecommunication Union (ITU).

2.6.1.2. Radio Direction-Finding Equipment

The procedures for procurement of a radio direction-finding equipment covering the 20 MHz - 3 GHz band were also concluded in 2002. This equipment was installed in a specially configured vehicle. The mobile radio direction-finding unit meets strict technical specifications and has proven an exceptionally valuable tool in radiolocation and in the suppression of illegal broadcasts (see also sub-section 2.6.1.1.).

This unit is also used to conduct inspections outside Attica, as well as in areas within Attica, which are not covered by the two FMSs.

2.6.1.3. Portable Equipment

In addition to the above equipment, which is permanently installed either in the fixed stations or in the mobile radio direction-finding unit, EETT in 2002 purchased portable equipment that is used according to the type and requirements of each technical check. More specifically, this equipment includes the following systems:

► **GSM/DCS Mobile Telephony Network Control System**

This system is used to measure specific quality indicators in mobile telephony networks, in order to establish the providers' compliance with the terms of their authorisations, as well as for conducting on-site inspections of illegal mobile telephony base stations.

► **Frequency Spectrum Surveillance Equipment for Frequencies up to 40 GHz**

This equipment includes a spectrum analyser, mixers and antennas allowing surveillance of the spectrum up to 40 GHz, and is used in checking frequencies above 3 GHz, such as in microwave and satellite links, and Local Multipoint Distribution System (LDMS) networks.

► **Portable Spectrum Surveillance Equipment for the 2 kHz - 3 GHz band**

This system, procurement of which is expected to be concluded in early 2003, concerns two portable, lightweight receivers, with accompanying directional antenna sets, covering the 2 MHz - 3 GHz. This equipment is to be used for surveillance of the HF band (3 - 30 MHz), as well as for conducting inspections in the VHF (30 - 300 MHz) and UHF (300 MHz - 3 GHz) bands at locations, which cannot be accessed using the mobile radio direction-finding unit, such as on rooftops or, in mountainous areas.

The above equipment, together with the portable equipment already in possession of EETT (one spectrum analyser for the 9 kHz - 2.7 GHz band and two field strength meters for controlling television signals), are transported using a specially configured vehicle.

2.6.2. Staffing

A prerequisite for efficient spectrum monitoring was to increase the EETT human resources supporting Spectrum Monitoring operations. To this end, in 2002 EETT recruited suitable technical and administrative

personnel, and special experts.

At the end of 2002, the personnel employed by EETT on spectrum monitoring numbered 23 individuals (compared to 12 in 2001), who have been trained to meet the requirements of monitoring operations.

2.6.3. Organisation - Procedures

The ever-increasing requirements for effective spectrum monitoring, combined with the increase in human resources and the improvement (in terms of both quantity and quality) of EETT's equipment, necessitate the revision of the existing spectrum monitoring organisation and procedures. An additional factor to this end is the introduction of the new EU Regulatory Framework in Greece.

Recognising this necessity, in 2002 EETT assigned to a specialist consultant the review of the organisation of the Spectrum Division in general, taking into consideration the above issues. The consultant has already reviewed the current situation, in terms of both the legal framework and of the procedures applied, and has also surveyed the practices as applied by other NRAs. Drawing on the above, the consultant will propose new procedures and improvements to the existing ones, as well as the required staffing, with the aim to ensure a more efficient control of the spectrum and a more swift response to complaints and requests submitted by users.

2.6.4. Protection of High-Priority Networks

Protection of wireless networks relating to the protection of human life and public order is a top-priority issue for EETT. Indicative examples of such networks are the networks of the Civil Aviation Authority, the Armed Forces, the Police, the Fire Brigade, and the National First Aid Centre.

In particular, interference in the frequencies used for radio aids and for the communication systems

of the Civil Aviation Authority creates problems for Air Navigation security. For this reason, a key concern of EETT in 2002 was to reduce the response times in such cases.

2.6.4.1. Interference Problems in Air Navigation Frequency Bands

The frequency bands made available internationally to meet Air Navigation needs include the 108 - 137 MHz band. Within this band, the 108 - 118 MHz sub-band is intended for radio aids, i.e. for electronic transmission and reception systems used for safe navigation of aircraft, while the 118 - 137 MHz sub-band is used to serve other communication needs, such as the communication between aircraft pilots and air traffic controllers.

The 108 - 137 MHz band is located right next to the band used for FM radio broadcasts (87.5 - 108 MHz). As a result of this adjacency, there are potential risks of interference from radio broadcasts in the Air Navigation frequency band. This interference is usually due to the excessive power of some radio broadcasts, which results in the creation of interference effects which prevent smooth operation of the radio aids and of communications. If the interference takes place on a frequency used for communication, this communication becomes difficult or even impossible, while if this frequency is used by some radio aid, then the interference leads to erroneous instrument readings and, ultimately, to the aircraft diverging from its correct course. In certain circumstances, both situations can prove dangerous for the safety of flights.

From the above, it becomes clear that radio broadcasts should not take place in a reckless manner. Recommendation 1009 of the International Telecommunication Union - Radiocommunications (ITU-R), imposes the obligation for harmonisation of the radio broadcasts with Air Navigation frequencies, and describes in detail the procedure



to be followed. This harmonisation results in the need to impose a set of concrete technical specifications, which must be met by radio broadcasting stations. These specifications concern mainly the following:

► **Broadcasting Frequency**

Radio stations must broadcast in precisely determined frequencies.

► **Effective Radiated Power**

The effective radiated power of radio stations is not allowed to exceed a particular maximum value.

► **Broadcasting Position**

Radio broadcasts must be made from specific positions, where radio-TV parks are organised. The creation of such parks helps significantly the efforts to control the observance of the specifications by licensed stations.

► **Radiation Pattern**

The radiation patterns of transmission antennas must meet certain specifications.

In its entirety, the set of technical specifications that radio broadcasts in each area must meet are usually referred to as “FM Radio Frequency Map”. Regarding Greece, Maps have been drawn up for every Prefecture. Nevertheless, with the exception of the Attica Prefecture, these Maps have not yet been applied: in practice, this has resulted in the non-fulfilment, on the part of radio stations, of the obligation to observe the foreseen technical specifications. Significant problems are thus created in Air Navigation frequencies. During 2002, the Civil Aviation Authority submitted over 400 complaints for interference across the entire Greek airspace.

Regarding the operation of private radio stations, the problem stems from the existing regime. More specifically, Law 2328/1995 introduced the establishment and operation of private radio stations and determined their licensing procedures. Furthermore, in accordance with Law

2778/1999, it was determined that until conclusion of the licensing procedure for the radio stations in each Prefecture, the stations in operation on 1 November 1999 would be considered as “legitimately operating”.

The licensing responsibility belonged originally to the Ministry of Press and Mass Media, and today has been transferred to the National Radio-Television Council. This licensing of radio stations has not been concluded, with the exception of the Attica Prefecture. Therefore, the status applying to the radio stations in the rest of Greece is that of “legitimately operating” radio stations. Furthermore, no record has yet been established of the equipment of legitimately operating radio stations, resulting in the inability to locate stations operating illegally and impose on them the penalties as provided for by the legislation.

Finally, regarding Attica, where 35 private radio stations have been licensed, the procedures for organising radio-TV parks in Mount Parnitha and Mount Hymettus, as provided for under the Frequency Map for Attica, have not made any progress. This has resulted, on the one hand, in non-observance of the specifications by the licensed radio stations, and, on the other hand, in facilitating installation of illegal stations in the Mount Parnitha and Mount Hymettus broadcasting centres, which have been configured in a chaotic manner.

A key prerequisite for drastically resolving interference problems is to grant operating licences and determine broadcasting parameters for private radio stations in the peripheral regions of Greece, so that these stations broadcast in accordance with the specifications stipulated by the Frequency Map for each Prefecture. Furthermore, it is necessary to create organised antenna parks at selected locations in every Prefecture, which will ensure legitimate spectrum usage and protection from illegal broadcasts.

In 2002, EETT undertook actions necessary to address efficiently the interference problems in high-priority networks, and especially in Air Navigation frequencies.

2.6.4.2. EETT Actions to Protect High-Priority Networks

Relevant EETT actions during 2002 were as follows:

► **Installation of Fixed Spectrum Surveillance Stations**

As already mentioned in sub-section 2.6.1.1., in 2002 EETT installed a fixed spectrum surveillance station in its offices and another in the premises of the AIA. These stations record daily the spectrum usage in the frequency range in which Air Navigation networks and other public security networks operate.

The data recorded by the station located in the premises of the AIA are transmitted via a telephone line to the EETT offices, allowing for continuous information on spectrum usage. In the event of harmful interference in the airport frequencies, the type of interference is immediately identified and the required actions to resolve the problem are undertaken.

In addition, in order to address the risks of interference, EETT monitors daily the broadcasting power of radio stations, through the measurements gathered by the two Monitoring Stations, and informs the responsible bodies (National Radio-Television Council, Public Prosecutor's Office, Ministry of Transportation and Communications, Ministry of Press and Mass Media) in cases where the legally allowed maximum transmitted power is exceeded.

► **Determination of Procedure for Dealing with Emergencies**

For handling emergencies, the "standby" operation was introduced. On a daily basis, including holidays, a "standby" team (composed by suitably trained technical and investigation personnel) is ready, on a 24-hour basis, to

immediately investigate interference problems in high-priority networks. This team is brought to action following a telephone call from the responsible departments.

► **Dealing with Interference Problems at the Athens International Airport**

During 2002, 13 cases of interference in the terrestrial frequencies of the AIA were reported and dealt with successfully. Most of the interference problems were due either to licensed stations exceeding the broadcasting power limits, or to broadcasts by illegally operating stations. In the first case, the licensed stations were obliged to immediately reduce their broadcasting power and then take appropriate corrective action (e.g. replacement or calibration of antenna systems) in order to avoid similar problems in the future. In the cases where the interference was due to broadcasts by illegally operating stations, EETT suspended their operation and confiscated their equipment, in application of the procedure for flagrant offences, as provided for by Law 2801/2000.

It should be noted that conclusion of the licensing procedure for the 35 radio stations in Attica by the Ministry of Press and Mass Media, and the harmonisation of their operating frequencies with the Frequency Map in force, has helped significantly to reduce interference problems in the AIA frequencies. The actions implemented by EETT for establishing detailed records of radio broadcasting installations in Mount Hymettus, and the confiscation operations conducted by EETT in 2002 (see sub-section 2.6.5.), were in line with the above.

► **Handling Interference Problems in Airports outside Attica.**

EETT also is active in ensuring smooth operation of radio communications in airports outside Attica. In 2002, EETT conducted relevant inspections throughout Greece, intervening to resolve interference problems. More specifically, in 2002 EETT crews, using the mobile radio direction-finding unit, visited the airports in Skiathos, Chios,



Thessaloniki, Heraklion and Chania, as well as the telecommunications station of the Civil Aviation Authority in Mount Geraneia.

It should be noted that in their overwhelming majority (over 90% of cases), occurrences of interference in Air Navigation frequencies are reported only in receivers on aircrafts, and not on the ground. These interference occurrences are usually due to the high broadcasting power levels of radio stations broadcasting across the entire Greek territory. In such cases, inspections from the ground are impossible and, therefore, dealing with this problem is extremely difficult.

2.6.5. Control of Radio-TV Broadcasting Installations

In order to respond more effectively to its auditing role, EETT launched in 2002 the operation to establish a detailed record of the broadcasting installations of radio-TV stations in Attica, starting with the Mount Hymettus broadcasting centre.

Control of broadcasts originating from radio-TV installations located in Mount Hymettus is of particular importance, as it is directly related to the safe operation of the AIA.

In March 2001, after the licensing procedure for the first 20 private radio stations was completed, and prior to the Airport becoming fully operational, a large-scale operation was conducted to locate 40 illegal radio stations and suspend their operation. Nevertheless, stations broadcasting illegally in the FM band appeared again in the course of time.

In addition to the State-owned radio-TV organisation, the Mount Hymettus broadcasting Centre is home to the majority of the licensed private radio stations and of the legally operating private television stations. The conditions under which the centre operates, however, exhibit

significant shortcomings compared to those of a model radio-TV park. A key feature of the current situation is the absence of any serious guarding of the site, which would ensure the operation only of licensed and legally operating stations, deters the operation of illegal stations. In addition, the fact that the broadcasting installations (containers, antenna systems) belonging to the radio stations whose operation was suspended in March 2001 have not yet been removed, provides the opportunity for illegal radio stations to establish themselves and operate there, using some of the existing and theoretically inactive installations.

The combination of past experience with the issues mentioned above create a situation requiring a comprehensive overall approach and the application of systematic resolution methods for resolving the problems arising in Mount Hymettus. For this reason, during the second semester of 2002 EETT focused its efforts on drawing a detailed picture of the situation in the Mount Hymettus broadcasting centre. These efforts were structured as follows:

- ▶ All legally operating radio and television stations were initially asked to submit technical files on the equipment that they have installed in the Mount Hymettus broadcasting centre. The data of the files submitted were used to create an electronic file for each station's broadcasting equipment.
- ▶ Following a relevant order from the Public Prosecutor's Office, a preliminary inquiry was held concerning illegal broadcasts originating from the Mount Hymettus area. These activities resulted in detailed records on the containers and antenna systems that did not belong to legally operating stations. The relevant preliminary inquiry material has already been forwarded to the Public Prosecutor, while on the basis of these records it concluded that around 1/4 of the total number of containers to be found in Mount Hymettus do not belong to any legally operating radio or television station.

- In the last quarter of 2002, EETT employees conducted four operations inspections on Mount Hymettus installations, during which broadcasting equipment from a total of 20 containers was confiscated. The equipment confiscated includes the transmitters of five illegally broadcasting radio stations, while it should be noted that two of these FM transmitters were found in the container of a legally operating TV station.

It should be pointed out that during the period from 26 October to 31 December 2002, i.e. after these inspections, EETT received only three complaints for interference in the AIA frequencies. This proves the effectiveness of the inspections conducted, whose immediate goal was to protect the AIA frequencies.

Future EETT actions to cease operation of illegal stations in Mount Hymettus are structured along the following two action lines:

- Inspections of installations.
- Removal of containers and antenna systems that do not belong to legally operating stations, in cooperation with other competent authorities.

It should be mentioned that illegal installation and operation of non-licensed radio and television station entails violation of several other provisions of the legislation in force (trespassing on forest area, illegal connection to the power supply network etc.). Consequently, putting an end to this phenomenon requires cooperation between all involved entities - EETT, Forest Department, Ministry of Environment, Physical Planning and Public Works, Public Power Corporation, Police - until the problem is finally resolved, through the creation of the radio-TV parks provided for by the Frequency Maps, organised in accordance with international standards.

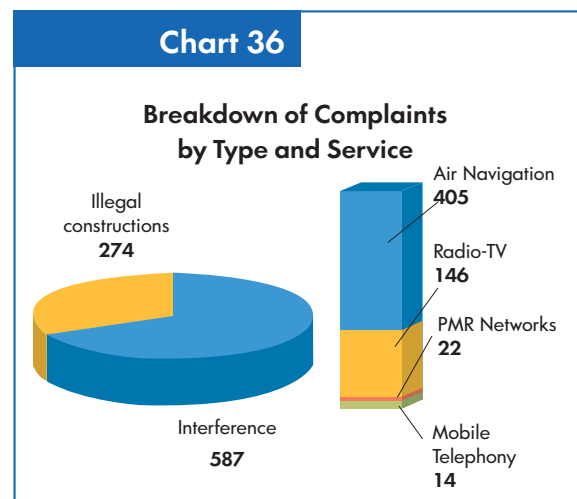
2.6.6. Investigation of Complaints

In addition to EETT actions aimed at creating the structures required for the exercise of its

responsibilities regarding spectrum monitoring, the Spectrum Monitoring Division was also active in investigating complaints submitted by both spectrum users and citizens.

In order to respond to spectrum monitoring requirements in regions other than Attica, in 2002 EETT cooperated with the Transportation and Communications Departments of the local Prefectural Authorities, on the one hand, and with University Institutions, on the other. These organisations made a significant contribution to meeting the needs arising, in cases where EETT resources were not sufficient.

The total number of complaints concerning interference problems or illegal antenna mast constructions in 2002 amounted to 861. Chart 36 shows the breakdown of complaints by type and service.



The main volume of complaints concerned interference problems in Air Navigation frequencies. A total of 405 such complaints were submitted in 2002, of which 368 concerned interference problems occurring on aircraft only, for which technical checks from the ground are for the time being impossible. The remaining 37 complaints, which concerned ground interference problems, were mainly dealt with by dispatching a technical EETT team (see also sub-section 2.6.4.2.).



Investigation of complaints concerning mobile antenna mast constructions was one of the most important EETT activities in 2002 (see sub-section 1.4.3.). A total of 274 such complaints were submitted, of which 130 concerned non-licensed constructions. Monitoring operations consisted in a total of 91 on-site inspections of mobile telephony base stations, of which 83 were in Attica and 8 in the rest of the country. In addition, one case was assigned to the Radio Communications Laboratory of the Aristotle University of Thessaloniki (AUTH), while assistance from the relevant Prefectural Authorities was sought for 56 cases outside Attica. It should be noted that these inspections (148 in total) also included 18 cases of licensed antenna mast constructions, which were checked to verify the observance of the terms of their licences.

It is worth noting that, following the above actions, all investigations of complaints concerning illegal mobile telephony antenna mast constructions within Attica were completed, while investigation is pending for 31 cases of complaints outside this region.

A total of 146 complaints concerning interference problems in radio-TV stations were submitted during 2002. Of these, 78 concerned the Attica region, and were investigated almost in their totality. In the cases where the investigations confirmed the contents of the complaint, the technical reports were forwarded to the National Radio-Television Council and to the Ministry of Press and Mass Media for imposition of the administrative penalties provided for by the legislation on radio-television. The remaining 68 complaints, which concerned problems outside Attica, were forwarded to the relevant Prefectural Authorities.

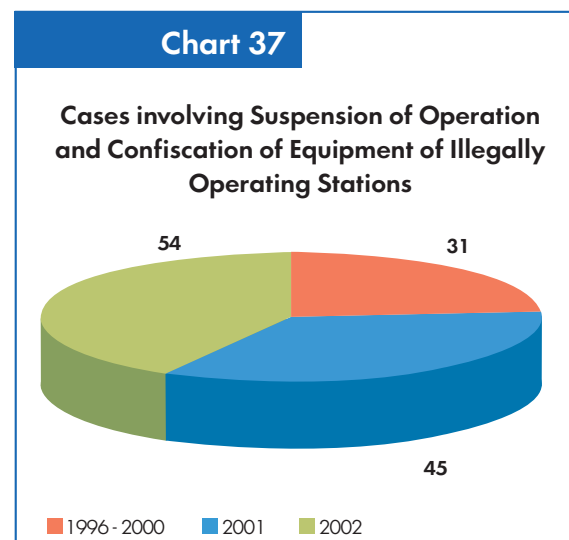
A smaller number of complaints (22) concerned interference problems in PMR Networks. Due to the limited technical resources available, the intermittent nature of the transmissions and the legal particularities regarding licensing, these cases are in general difficult to deal with. Special priority was given to cases of interference in Police and Fire Brigade

radio networks, for which every effort possible was made, with positive results.

Finally, a small number of complaints (14) concerned interference in mobile telephony networks. Of these, all cases in Attica (6) were investigated and resolved. For cases of interference outside Attica (8 complaints), two of these complaints are still pending.

2.6.6.1. Confiscation of Illegally Operating Stations

In addition to the investigation of complaints concerning interference in frequencies used by legitimate spectrum users and illegal antenna mast constructions, in 2002 EETT conducted spectrum inspections in the Attica region, in order to ascertain, locate and suppress illegal broadcasts. In order to perform these inspections EETT took into consideration written complaints in addition to the recordings made by the Monitoring and Radio Direction-Finding Stations.



These investigations resulted in the location and confiscation of broadcasting equipment (see Chart 37) belonging to a total of 54 illegally operating stations, registering a 20% increase compared to corresponding actions in 2001 (45).

2.7. Radio Equipment and Telecommunications Terminal Equipment

Radio equipment is all equipment, which includes a transmitter and/or receiver and provides radio wave communication. Examples of radio equipment include mobile phones, satellite terminals, Citizen Band (CB) devices and radiotelephones on ships, cordless phones, transponders, remote controls, wireless control systems, cordless microphones, wireless local area network equipment, and remote control toys.

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

The regime governing placing on the market and use of Radio Equipment and Telecommunications Terminal Equipment (RE-TTE) across Europe has been determined by Directive 1999/5/EC of the European Parliament and of the Council. The aim of the Directive was to establish a legislative framework that would harmonise the regime of placing on the market and use of such equipment throughout the EU, and would facilitate the introduction of new products in the market.

Directive 1999/5/EC of the European Parliament and of the Council "On radio equipment and telecommunications terminal equipment and the mutual recognition of their conformity" was transposed into the Greek legislation by Presidential Decree 44/2002⁷⁶, which was issued in early 2002 to regulate the placing on the market, free movement and putting into service of RE-TTE.

⁷⁶ FEK Issue 44/B/07-03-2002.

The key priorities of the Directive and PD 44/2002 refer to the following action lines:

- ▶ Conformity of equipment to the essential requirements (requirements for protection of the health and the safety of the user or of any other person, protection requirements with respect to electromagnetic compatibility).
- ▶ Effective spectrum usage and avoidance of harmful interference.
- ▶ Assessment of conformity to the essential requirements.
- ▶ Conditions for placing on the market and free movement of equipment.
- ▶ Surveillance of the market and adoption of measures for its protection.

According to PD 44/2002, the following responsibilities are assigned to EETT:

- ▶ Determination of radio interfaces, i.e. of the technical specifications for spectrum usage.
- ▶ Publication of the interfaces of telecommunications providers, so that the design of terminal equipment capable of connecting to the specific interfaces and of using the services provided by these is feasible.
- ▶ Determination of criteria and procedures for assessment of the parties interested in being designated as Notified Bodies, having as their main task to perform audits and assess the compliance of manufacturers for certain classes of equipment. These Bodies are notified to the EU by EETT.
- ▶ Surveillance of the RE-TTE market.
- ▶ Representation of Greece in the Telecommunication Conformity Assessment and Market Surveillance Committee (TCAM).

EETT Actions

During 2002, EETT received all radio equipment notifications submitted by the equipment



manufacturers or their authorised representatives, as provided for by PD 44/2002. EETT developed a system for electronic management of notifications, so that a common database for all notifications is available and the time required to process requests is reduced.

Information on the application of the Directive and the model notification form (in Greek and in English) were provided on the EETT website. In parallel, responses were provided to all queries that were submitted to EETT regarding the distribution and use of RE-TTE.

The advances in technology and the establishment of new European and international standards created the need for the use of frequencies by various classes of radio equipment, for which no provisions had been made in the National NFAT. In order to harmonise the Greek status concerning distribution and use of radio equipment with that in the other European countries, EETT sent to the Ministry of Transportation and Communications a relevant Recommendation on the Modification of the NFAT, so that these new classes of radio equipment can be placed on, and operate in, the Greek market.

In 2002, EETT drafted the interfaces for a considerable number of radio equipment classes, in Greek and in English. The procedure for notification of these interfaces to the European Commission, in accordance with the provisions of PD 39/2001, will begin during 2003. In the framework of procurement of the NSMMS, a provision has been made for the purchase of hardware and software to meet the needs of EETT in relation to RE-TTE. EETT maintains the relevant records, publishes information, applies the opinions by the European Commission, and promotes the issues arising in the interests of Greece.

Important issues regarding the use of classes and types of radio equipment arise in view of the 2004 Olympic Games to be held in Greece. In the Management Plan developed for the Olympic

Games, a provision has been made for covering the needs to arise through the use of radio equipment.

EETT has set as an immediate goal for 2003 the completion of a modern Regulatory Framework with appropriate specifications for the use of equipment. In addition, EETT intends to plan and implement an effective and efficient internal organisation and a market surveillance system for the RE-TTE market.

In order to attain the above goals, EETT is working closely with the specialist consultant who has undertaken the project of the "Organisation of the Spectrum Department". During 2003, EETT is expected to issue Regulations on:

- ▶ The determination of the features for all interfaces, which are regulated by EETT and notified, to the European Commission.
- ▶ The identification of terms and procedures on the basis of which the interfaces of telecommunications providers will be published.
- ▶ The determination of criteria and procedures for assessment and publication of Notified Bodies.

In addition, upon completion of the Regulatory Framework and based on its responsibility regarding market surveillance, EETT will systematise the performance of sample inspections regarding conformity levels for the RE-TTE placed on the Greek market. In parallel, EETT will undertake initiatives for provision of information to the market.

2.8. National Spectrum Management and Monitoring System

In parallel, with the equipment previously mentioned, which aimed at meeting the immediate control and monitoring needs, in 2002 EETT embarked on the

procedures regarding procurement, installation and operation of the NSMMS.

The NSMMS, which has been included in the OPIS under CSF III, is an integrated system composed of software, applications, and hardware, which will support spectrum management and monitoring operations. Through procurement and operation of the NSMMS, EETT seeks to attain the following objectives:

➤ **Effective Spectrum Management**

The nature of the electromagnetic spectrum as a scarce resource necessitates the implementation of mechanisms for its proper management and effective utilisation. The extensive demand and increasing intensified usage of radio frequencies necessitates the creation of a national system meeting the above requirements.

➤ **Surveillance of Proper Spectrum Usage**

Surveillance of legitimate usage of the radio frequency spectrum is one of the most important aims of the NSMMS. More specifically:

◦ *Protection of High-Priority Networks*

The system will provide the means necessary for ensuring, at a national level, the smooth operation of the services that are related to the security of the citizens and the national defence, such as locating the source of interference in the frequencies used by the Civil Aviation Authority, the Armed Forces and the Police.

◦ *Location of Illegal Broadcasts*

The NSMMS will provide the capability for quickly and effectively locating illegally broadcasting stations, protecting in parallel legitimate users.

◦ *Compliance of Legitimate Users with the Terms of their Licences*

The system will be used for surveillance of the operation of broadcasting stations of legitimate users, and the measurements to be performed will be used to assess the level of compliance of

each user with the specifications and terms of the licence held by the user.

➤ **Provision of Secure and Reliable Radio Communications Environment during the 2004 Olympic Games**

The requirements for spectrum management and monitoring in the framework of the 2004 Olympic Games will be particularly increased, and implementation of the NSMMS is absolutely necessary for meeting the needs to arise.

➤ **Stimulation of Competition**

Implementation of the NSMMS, which will ensure spectrum surveillance and compliance with the relevant laws and regulations, will contribute to the creation of conditions of fair competition between commercial users.

➤ **Cooperation of Greece with International Authorities**

At the global level, coordination of spectrum usage is exercised by ITU, and, at the EU level, by the European Commission. The NSMMS will support coordination with international authorities, compliance with international frequency coordination standards, and resolution of interference problems with neighbouring countries.

Implementation of the NSMMS has been divided in two phases. The first phase, currently in progress, aims to cover the Athens and Thessaloniki regions, and to contribute to spectrum management and monitoring during the Olympic Games. The second phase, which is foreseen to begin within 2004, will include coverage of all other regions of Greece.

In the first phase, the NSMMS will include the following sub-systems (see Figure 5):

- National Control Centre (NCC), located in the EETT headquarters in Athens, where spectrum management and monitoring operations at the national level will be performed.
- Regional Control Centres (RCCs), in Athens and Thessaloniki.



- ▶ 3 FMSs in the wider Athens region, and 2 FMSs in the wider Thessaloniki region.
- ▶ 4 Mobile Monitoring Stations based in Athens, and 3 such stations based in Thessaloniki.

Mobile Monitoring Stations will also be equipped with portable equipment and, whenever this is required, will travel to various locations in the country to perform inspections to assess spectrum usage.

In 2002, EETT conducted a public open tender procedure to award the first phase of the NSMMS. The budget for the project was 14,670,000 euro (exclusive of VAT). The contract was awarded to ROHDE & SCHWARZ GmbH & Co.KG, a German company, with the final cost reaching 12,338,854 euro (exclusive of VAT). It should be noted that this project has been included for funding in the OPIS under CSF III. A first part of the System is expected to be delivered and enter into service for the first time in the framework of the Olympic Test Events, to be held in August 2003.

2.9. Internet - Electronic Transactions

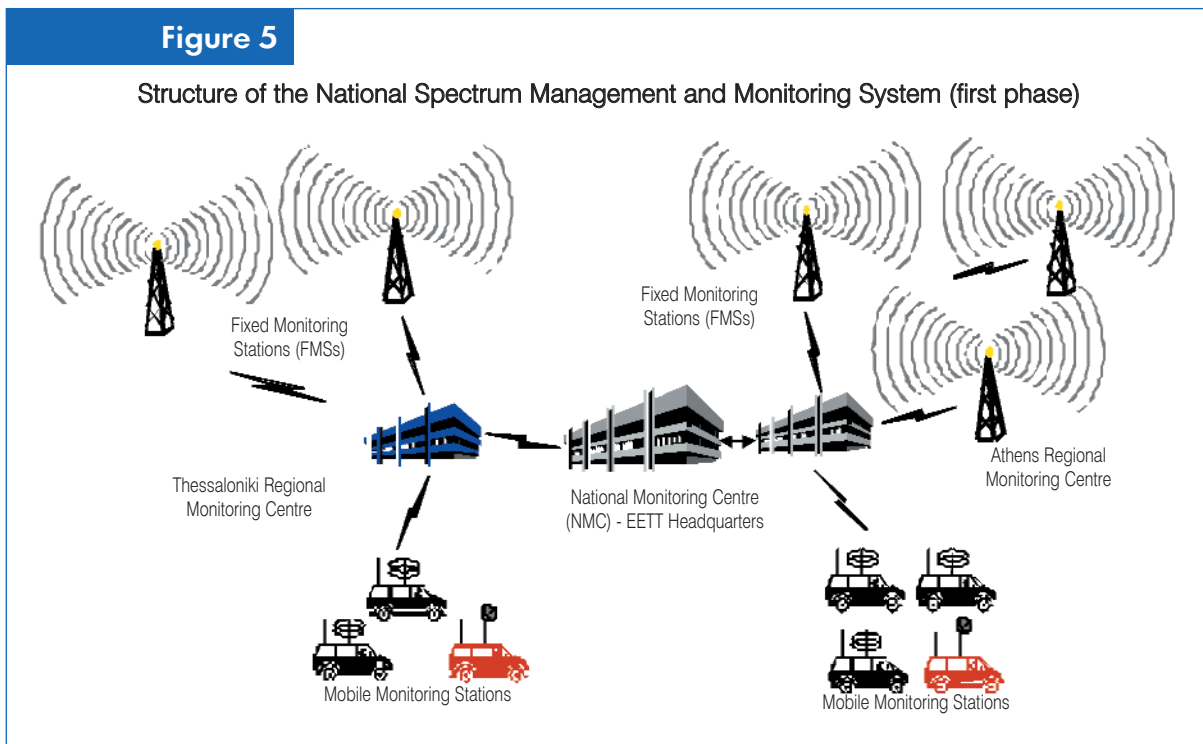
2.9.1. Electronic Signature

The global growth of the Internet during the last decade was admittedly rapid, as it already is a widely used communication and information retrieval tool. In addition, a large number of entities (public and private) is already active in the Internet and provides advanced electronic services and products, offering to consumers a variety of capabilities and facilities. Nevertheless, the growth of electronic commerce was not the one expected, contrary to relevant forecasts.

The most important reason for the limited diffusion of electronic commerce is the lack of trust on the part of consumers, who consider that the Internet does not or cannot have available sufficient security levels.

Figure 5

Structure of the National Spectrum Management and Monitoring System (first phase)



Use of digital certificates, and of Electronic Signature in particular, within a pre-determined legislative framework that will govern the operation of Electronic Signature Certification Services, is expected to lay the foundations for users' confidence in the Internet and, by extension, in electronic transactions.

The recent PD 342/2002 on the "Movement of documents via electronic mail between public services, legal persons governed by public law and Local Authorities or between these and natural or legal persons governed by private law and associations of natural persons" emphasises the importance of Electronic Signature in transactions between State entities, and lays down the basic framework for the expansion of electronic transactions to the benefit of citizens.

The responsibilities of EETT include, inter alia, provision of Voluntary Accreditation for Certification Service Providers (CSPs), i.e. accreditation which will take place following a relevant request submitted by the providers. Voluntary Accreditation defines rights and obligations that govern the Provision of Certification Services, aiming to improve the quality of the relevant services.

Harmonisation of the Greek legislation with the provisions of Directive 1999/93 on Electronic Signature took place by PD 150/2001⁷⁷, from which the following responsibilities derive for EETT:

- Determination that the software/hardware used for creating the Electronic Signature (e.g. smart cards) is secure, a task that EETT may assign to public or private entities.

- Provision of Voluntary Accreditation, following an application in writing by the interested CSP, possibility to assign this task to public or private bodies.
- Supervision and control of CSPs established in Greece, as well as of the bodies appointed by EETT for accreditation and checking of the software/hardware used to create the Signature.

In 2002, EETT announced the results of the Public Consultation, which was held in 2001 with the aim to record the views of the interested parties on issues such as the terms, obligations and prerequisites for Voluntary Accreditation, as well as on the scheme proposed for implementation of Voluntary Accreditation and CSP control and supervision. In broad terms, the majority of the participants acknowledged the necessity for Voluntary Accreditation, but also for the existence of independent auditing bodies to determine compliance by CSPs with respect to the secure Signature-creation devices⁷⁸. In addition, EETT has recorded the participants' proposals/approaches on international standards regarding reliable systems and products, thus obtaining an overall picture of the likely requirements from a standardisation viewpoint.

In the framework of its supervisory and controlling role, EETT issued in May 2002 a Regulation⁷⁹ that determines the legislative framework for operation of the control mechanisms and lays the foundations for widespread diffusion of Electronic Signature. More specifically, EETT regulates the supervision and control of Electronic Signature CSPs who are established in Greece and issues certificates or provides other services related to Electronic Signature. The Regulation also clarifies matters concerning qualified certificates, which confirm the identity of the signatory party and have the same legal

⁷⁷ PD 150/2001, FEK Issue 125/A/25-06-2001.

⁷⁸ *Secure Signature Creation Device: Hardware (e.g. smartcards, tokens) or software, which is under the exclusive possession of the person signing electronically and which ensures the uniqueness and secrecy of the Electronic Signature. Provided that specific requirements, as determined by the European and Greek legislation in force, are fulfilled, then the Signatures generated by such a device are legally equivalent to hand-written signatures.*

⁷⁹ EETT Decision 248/71/2002, FEK Issue 603/B/16-05-2002.



validity as that person's handwritten signature. Consequently, the persons who certify an electronic transaction using their Electronic Signature cannot subsequently deny the responsibilities resulting from that transaction. According to Directive 1999/93/EC and PD 150/2001, qualified certificates are of a specific format and are issued by a provider meeting certain requirements.

It should be noted that Provision of Certification Services by CSPs does not presuppose licensing by EETT, but merely the registration of CSPs in the relevant Registry maintained by EETT. CSPs send to EETT a registration statement, which states the types of services and certificates that they provide. In parallel, CSPs pay to EETT a relevant registration fee. Each party enrolled in the Registry must produce a detailed annual report on its certification-related activities, together with evidence of its financial reliability.

According to the Regulation, in case they suspend their activities, CSPs:

- ▶ Must meet all arising financial obligations, as well as the damages, if any, sustained by third parties as a consequence of the suspension.
- ▶ Are under the obligation to notify EETT in good time, and cancel the certificates that they have issued.
- ▶ In the case of a CSP who issues qualified certificates (in which case the CSP is under obligation to maintain a file with information concerning such certificates for a period of thirty years), the CSP must have reached agreement with another similar CSP who issues qualified certificates regarding delivery and maintenance of the first CSP's file.

Particular emphasis should be given to the provision of full information to the beneficiary of

the certificate, prior to contract signature, on the responsibilities and obligations of the two parties. In addition, the obligations of beneficiaries concerning storing and protection of their private key⁸⁰ should be pointed out, together with the consequences from its publication. In the case of loss of the private key, the beneficiaries must notify the provider immediately.

The Regulation defines the cases where the CSP must revoke a qualified certificate from the user. Indicative such cases mentioned are the issue of a certificate based on false information, a court decision ordering revocation, loss of legal capacity etc. For this reason, the obligations of CSPs issuing qualified certificates include uninterrupted operation (24 hours-a-day, 7 days-a-week) of the revocation service.

The EETT Registry with the data of the providers enrolled in it, and other relevant information, are available on the EETT website⁸¹.

In April 2002, EETT announced a public open tender procedure for awarding a Study on the Organisation, Planning and Implementation of Voluntary Accreditation of CSPs and on other issues pertaining to the Provision of Electronic Signature Certification Services. This project has been submitted for inclusion in the OPIS under CSF III.

The purpose of the project is to identify the precise framework for implementation of Voluntary Accreditation, as this has been defined in PD 150/2001, and the criteria for the selection of - public or private - Authorised Entities for (a) Voluntary Accreditation of Electronic Signature CSPs, and (b) determining compliance with the secure Signature creation devices.

⁸⁰ A unique alphanumeric sequence used to generate the Signature.

⁸¹ <http://www.eett.gr>, Subject Area "Telecommunications/ Electronic Signature".

The Figure below presents indicatively the key elements in the organisation of the above framework.

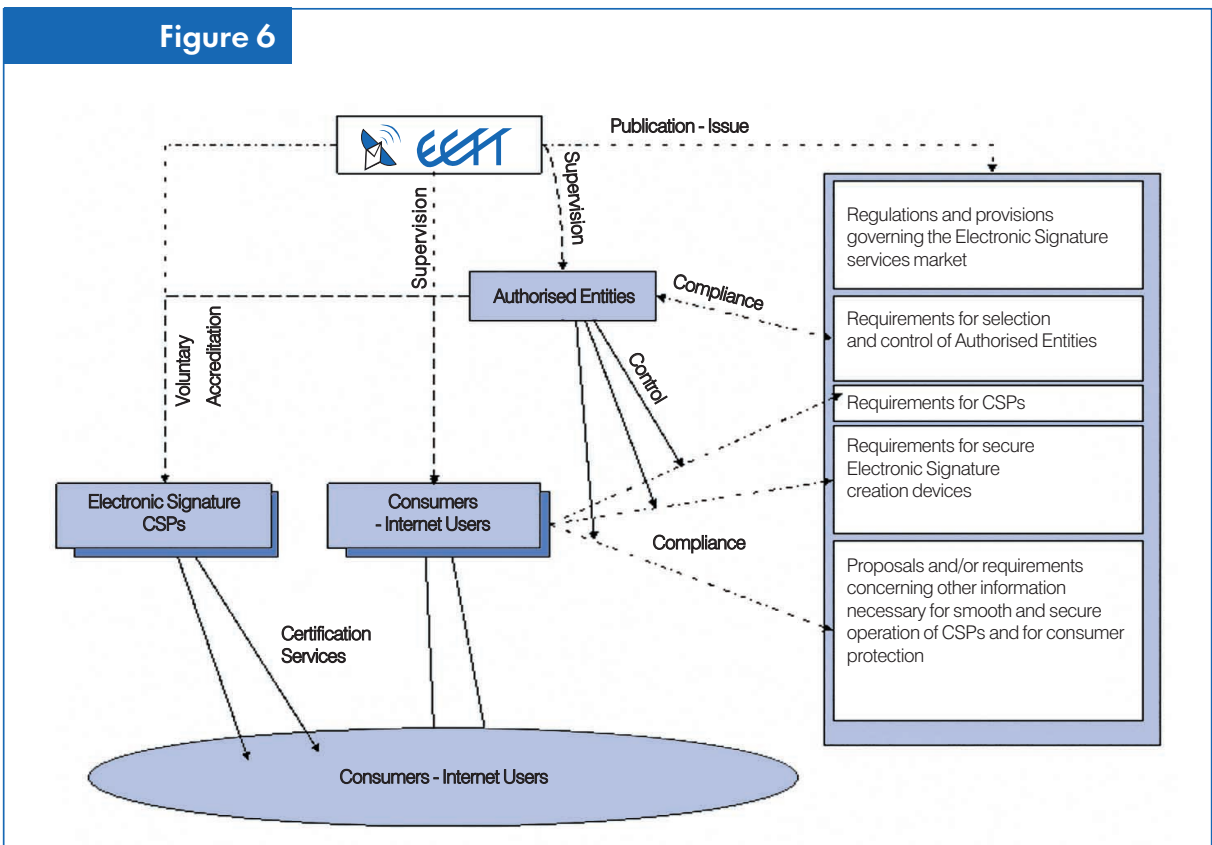
In formulating the key regulatory action lines, EETT supports diffusion of Electronic Signature, by promoting electronic transactions and Internet-based communication, in public sector areas (e-Government) as well as in the private sector. Thus, a competitive market for Electronic Signature certification products and services is to be promoted, to the benefit of end-users as well as to that of the organisations and bodies that will automate communication and transaction procedures.

Implementation of the Voluntary Accreditation scheme will be the starting point for creation of a reliable certification infrastructure for implementation and establishment of Electronic Signature. The CSPs to participate in this scheme

will provide reliable and high-quality services, which will observe the necessary specifications. Furthermore, the institution of auditing bodies for certification of “secure signature creation devices” will contribute to ascertain whether the preconditions for the legal validity of an Electronic Signature occur.

2.9.2. Domain Names

Domain Names are a prerequisite for Internet use and electronic transactions, since they offer to users information, entertainment, the possibility to make purchases, perform transactions with their bank, obtain services from Public Organisations etc. This is why during the last years a rapid increase in the number of applications for registration of Domain Names is observed throughout the world as well as in Greece.





According to Law 2867/2000, EETT is responsible for assigning [.gr] Top-Level Domain Names. EETT has assigned the management of these Names to the Computer Science Institute of the Foundation for Research and Technology Hellas (FORTH-ICS). On 31 December 2002, a total of 65,747 Domain Names were registered in the [.gr] Top-Level Domain Name, corresponding to an increase of around of 27.3% compared to 2001 (51,649 Names).

During the period from 1 to 30 July 2002, EETT held a Public Consultation on assigning and managing [.gr] Domain Names. The aim of the Consultation was to record in detail the views of Internet Service Providers (ISPs), of users and of any other interested party on issues such as selection of the model to be used as a basis for conducting the Domain Name registration procedure, registration rules, and especially issues such as Names transfer, protection of trademarks, maximum number of registrations allowed by natural persons, registration of geographical Names and out-of-court resolution of disputes.

EETT then issued a Regulation on assigning and managing [.gr] Top-Level Domain Names⁸². The following specific rules were set regarding the procedure for assigning Domain Names:

- A three-tier scheme (Registrants - Registrars - Registry) is adopted, and specific obligations governing the operation of the Registrars and of the Registry are determined.
- Specific conditions are set for the assignment of a [.gr] Domain Name, the principal of such conditions being the existence of distinctive capacity (i.e. the Domain Name must be capable of “personalising” the corresponding website,

so that other users are not precluded from obtaining a website with similar contents, while at the same time the Domain Name holder should not be granted excessive advantages in relation to potential competitors), and non-violation of third-party rights.

- The geographical names coming under the “Kapodistrias” plan are reserved for assignment to the corresponding Local Authorities.
- The restriction concerning registration of just one Domain Name by natural persons is lifted.
- The right of registration is extended to all natural or legal persons, regardless of citizenship.
- Restrictions in the transfers of Names are lifted.

In the framework of its responsibility for assignment of Domain Names, and of its obligation to regulate the smooth operation of Internet domain-naming operations, in 2002 EETT settled several cases of Domain Names whose registration had been disputed, thus avoiding further litigations between the interested parties.

In addition, EETT was represented before the courts in certain disputers concerning Domain Names, without being itself a party proper to the litigations, with the aim to more fully brief the Greek Courts on the protection of distinctive marks on the Internet, so as to contribute to the formulation of the relevant jurisprudence.

In this way, EETT contributed to the consolidation of the regulatory framework for Domain Names registration. This framework is expected to be further expanded in 2003, through a competitive tender procedure to be conducted for appointment of the Registry and subsequent entry of Registrants in the market.

⁸² EETT Decision 268/73/2002, FEK Issue 1617/B/31-12-2002.

2.10. Regulation on Universal Service Costing and Pricing Principles - Designation of Operators under Obligation to Provide Universal Service

2.10.1. Regulation on Universal Service Costing and Pricing Principles

In September 2002, EETT issued a Decision⁸³ concerning US costing and pricing principles.

The most important points in this Decision are the following:

- The costing model used is the FDC one, with current costs used as a costing base.
- Costs are determined taking into account the costs of an efficient telecommunications operator.
- The tangible and intangible benefits for the USP are taken into account in the calculation of the US net cost.
- In principle, the method used to calculate the cost of capital is the Weighted Average Cost of Capital (WACC).
- The costs borne by the mobile telephony companies for provision of elements of US are all the costs that can be justified.
- The ultimate aim of the EETT Decision on pricing and costing principles is to ensure application of equitable, transparent and impartial methods in the calculation of the cost of US.

2.10.2. Designation of Operators under Obligation to Provide Universal Service

In October 2002, EETT issued a Decision⁸⁴ designating OTE as the Operator under Obligation to Provide US until 31 December 2003.

This, along with other actions (see sub-sections 1.2. and 1.4.2.), lays down the foundations of the legislative framework for the re-organisation of US provision in a competitive environment. In parallel, it promotes social cohesion and effective provision of high-quality telecommunications services to all citizens.

Given that the legislative framework for provision of the US was established during 2002, in 2003 EETT will focus its actions on monitoring and controlling the implementation of the US content. Besides, EETT is responsible for the correct implementation of all the US elements mentioned above, as well as for ensuring their availability to all citizens.

In addition, EETT is responsible for conducting all actions concerning the determination of the net cost borne by the Operator under Obligation to provide the US. In order to formulate a policy on this issue, as well as on the issue concerning the designation of USP (after 2003), EETT is to hold a Public Consultation during 2003.

2.11. 2004 Olympic Games

During the 2004 Olympic Games to be held in Greece, requirements in radio frequency spectrum will be extremely high, due to the flexibility, ease and deployment speed which is typical of wireless networks as compared to fixed wire ones. Use of wireless systems for transmitting data, voice and image is a very significant part of the infrastructure required for holding successful Olympic Games.

The main users of these systems will be the accredited users, such as the ATHENS 2004 Organising Committee, the Athens Olympic Broadcasting (AOB), i.e. the contractor to act as the broadcaster to provide the official radio-TV coverage of the Games, the broadcasting organisations holding

⁸³ EETT Decision 261/143/2002, FEK Issue 1208/B/18-09-2002.

⁸⁴ EETT Decision 264/140/2002, FEK Issue 1368/B/24-10-2002.



coverage rights for the Games, the Press and photo services, the International Federations, the International Olympic Committee etc. In addition to these, strong interest will be expressed by other users, mainly by international broadcasting and news Media, which will be required to use radio frequencies for the radio-TV coverage of the Olympic competitions and of events to be held outside the Olympic Venues.

The main services expected to be used are cordless microphones, hand-held radios, translation - guiding services, telemetry - telecommand and wireless systems for production of radio-TV signal and satellite communications.

The expected (extremely high) use of radio frequencies, concentrated within geographically restricted spaces (e.g. Olympic Games Facilities), requires careful planning and organisation, in order to ensure availability of the required spectrum, free from any interference, which will in turn ensure smooth and unimpeded operation of wireless transmission services.

To this end, EETT has developed the 2002 "Management Plan for the provision of a secure and reliable radio communications environment during the 2004 Olympic Games". Implementation of the Management Plan is already under way, and covers a broad range of actions.

The goal for EETT is to provide information to the interested parties on the procedures and conditions of use of the radio spectrum; to inspect and certify the equipment to be used during the Games; to grant corresponding Temporary Licences; and to monitor the spectrum for identifying any illegal broadcasts and interference problems.

It is worth noting that for the first time in the Olympic Games, the application for temporary radio frequency assignment will be submitted over the Internet. More specifically, EETT has developed, in cooperation with

the ATHENS 2004 Organising Committee, the "e-Spectrum" application for electronic submission of applications for radio spectrum usage, which is already available on the Internet (<http://services.athens2004.gr/espectrum>). Through this application, interested radio frequency users can obtain information on the current radio frequency licensing status for the Olympic Games, submit their enquiries and monitor their progress via the Internet. The very first applications have already been submitted.

Furthermore, during 2002 EETT continued its active participation in the Working Group on radio spectrum issues, working closely with the ATHENS 2004 Organising Committee, the Ministry of Transportation and Communications and the main radio frequency spectrum users (Armed Forces, Civil Aviation Authority, Greek Radio and Television, OTE etc.), with the aim to resolve availability and scarcity problems that arise and ensure that the requirements of the Games will be met.

For conducting the equally critical spectrum monitoring operations and for avoiding interference problems during the Games, EETT will be fully supported by the NSMMS (see sub-section 2.8.). It is worth noting at this point the importance of the television signal, which is globally broadcasted live, and the minimal response time margin available in cases of interference. In addition, an "early" version of the NSMMS will operate for the August 2003 Test Events.

2.12. Administrative Penalties imposed on Telecommunications Undertakings during 2002

Table 14		
Table of Fines		
Company	Reason	Total Fines (in euro)
COSMOTE S.A.	18 illegal installations of mobile telephony antenna mast constructions	208,426
OTE	Violation of the legislation on Leased Lines	1,500,000
OTE	Discriminatory treatment of OTENET S.A.- Violation of the legislation on Leased Lines	400,000
STET HELLAS S.A.	13 illegal installations of mobile telephony antenna mast constructions	145,892
VODAFONE-PANAFON	27 illegal installations of mobile telephony antenna mast constructions	237,392

Table 15	
Table of Recommendations	
Company	Recommendation on
OTE	Relocation of mobile telephony antenna mast construction
3C COM LUXEMBOURG S.A.	Violation of the legislation on the provision of telecommunications services
OTE	Violation of existing provisions for free competition
UNITEL HELLAS S.A.	Violation of the provisions of Law 2867/2000 and of EETT Decision 207/2/2001 ("Regulation on Individual Licences") concerning transfer of shares and change in controlling ownership of Individual Licence holders
MEDITERRANEAN BROADBAND ACCESS S.A.	Violation of the provisions of Law 2867/2000 and of EETT Decision 207/2/2001



3. Goals

The year 2002 was an important one for EETT, as it created the conditions for an essential reconfiguration of the telecommunications environment, enabling the establishment of infrastructures by new undertakings, the development of new services and the creation of new jobs. For these operations, EETT received the European Commission's positive comments in the latter's 8th Report on the implementation of the regulatory package.

The year 2003 is equally important, and will be marked by the following interventions:

- ▶ Implementation of the new EU Regulatory Framework. The new Framework, which will be integrated into Greek law by July 2003, introduces new rules in the control of undertakings with SMP, encourages NRAs
- to hold Public Consultation prior to every important action, emphasises the significance of the measure of analysing and reviewing markets, and is in general the new analytical tool for applying the principles of competition in a European telecommunications market which is now mature.
- ▶ Reinforcement and integration of regulatory interventions for the development of broadband networks, so that users enjoy high-quality and high-speed telecommunications services.
 - ▶ Introduction of Number Portability in the fixed and mobile telephony networks, a measure that will strengthen stimulate competition to the benefit of users.
 - ▶ Implementation of the NSMMS. The new system will allow effective protection of a scarce national resource and of authorised companies, as well as rational spectrum utilisation. It will also allow EETT to prepare for its responsibilities during the 2004 Olympic Games.

Postal Services Sector





B. Postal Services Sector

1. Introduction

In the postal services sector, the goal of EETT, in line with its responsibilities as specified in Law 2668/1998, is to ensure the operation of fair competition and the provision of Universal Service (US), as well as to upgrade the quality of the services provided to the benefit of the consumers. Thus, during 2002 EETT instituted procedures for supervision of the postal market, which aimed at ensuring smooth operation of the market. EETT also conducted studies to investigate the degree of compliance of postal services providers with their obligations, and to assess the measures required for further development of the market and for strengthening competition, always with a view to ensure provision of better service to postal services users.

2. Legislative Framework

Law 2668/1998 incorporated Directive 1997/67/EC of the European Parliament and of the Council on common rules for the development of the internal market of Community postal services and the improvement of quality of service into Greek law. In application of this Law, the following Regulatory Acts were issued:

- ▶ Ministerial Decision 57810/1999⁸⁵, specifying conditions and necessary supporting documents for obtaining a General Authorisation for Provision of Postal Services, and other related matters.
- ▶ Ministerial Decision 53828⁸⁶, amending Ministerial

Decision 57810/1999.

- ▶ Ministerial Decision 25961⁸⁷, specifying conditions and necessary supporting documents for obtaining an Individual Licence for Provision of Postal Services, and other related matters.
- ▶ Ministerial Decision 29030⁸⁸, specifying the cases in which payment of compensation for inadequate provision of postal services is imposed.
- ▶ Ministerial Decision 79293⁸⁹, determining quality specifications of and terms for provision of US.

Directive 2002/39/EC of the European Parliament and of the Council of 10 June 2002 amending Directive 1997/67/EC with regard to the further opening to competition of Community postal services, was issued in 2002 and focused on ensuring US provision and improving quality of service. This new Directive amended primarily article 7 of the existing Directive 1997/67/EC, specifying lower weight limits for the services reserved to Universal Service Providers (USPs). Harmonisation of Greek law with the above Directive is yet to take place.

3. Market Liberalisation

In common with other European countries, the model followed in Greece is the controlled gradual liberalisation model. In addition to the benefits offered by competition and free entrepreneurship, this particular model ensures a smooth transition for citizens from a market with monopolistic features to a fully liberalised one. More specifically,

⁸⁵ FEK Issue 437/B/23-04-1999.

⁸⁶ FEK Issue 1580/B/28-12-2000.

⁸⁷ FEK Issue 671/B/30-05-2000.

⁸⁸ FEK Issue 683/B/02-06-2000.

⁸⁹ FEK Issue 1588/B/29-12-2000.

provision of US - i.e. of a basic level of services, at a specified quality and affordable price - to all citizens is ensured, independently of the additional benefits that result from free competition.

Gradual and controlled liberalisation reshapes the image of the market, which is undergoing constant evolution, while differentiating user requirements. Thus, a legislative framework capable of meeting modern needs is required. The Ministry of Transportation and Communications, capitalising on the experience gained in the course of the four years of application of Law 2668/1998, is currently working on a new law that will incorporate existing experience and will be adapted to the new conditions both in the market and in the EU.

Directive 2002/39/EC⁹⁰, which amended the existing Directive 1997/67/EC, aims at further developing and opening the postal market to competition towards full liberalisation in 2009, with interim milestone stages set for 2003 and 2006. The key point in the new Directive is the restriction of the services reserved to the USP to clearance, sorting, transport and delivery of domestic mail and incoming cross-border mail.

According to the new Directive, the weight and price limits of the services that may be continued to be reserved to the USP as above are as follows:

- 100 grams from 1 January 2003 for items whose price is less than three times the public tariff for a letter in the first weight step of the First Priority⁹¹ category, compared to 350 grams and five times this tariff as in force under Directive 1997/67/EC.

- 50 grams from 1 January 2006 for items whose price is less than two and a half times the public tariff for a letter in the first weight step of the First Priority category and weigh less than 50 grams.

To ensure the provision of US, member states may continue to exclusively assign to the USP direct mail and outgoing cross-border mail within the same weight and price limits.

3.1. Postal Undertakings

In terms of operating status, the undertakings, which at the end of 2002 were providing postal services in the Greek market, can be grouped into the following categories:

- ELTA, who primarily provides US.
- 262 undertakings holding General Authorisation for Provision of Postal Services.
- 1 undertaking holding an Individual Licence for Provision of Postal Services.
- 1,042 undertakings, other than ELTA post offices, operating as ELTA agencies and forming part of the ELTA Network.
- 392 undertakings which did not hold a General Authorisation or Individual Licence, but formed part of the Network of other licensed private-sector undertakings (other than the offices operated by such licensed undertakings) and operated under their orders and on their behalf.
- Fewer than 40 undertakings for which there was evidence that they were operating without observance of the requirements of the law, and for which EETT control proceedings are under way.

⁹⁰ Directive 2002/39/EC of the European Parliament and of the Council of 10 June 2002 amending Directive 1997/67/EC with regard to the further opening to competition of Community postal services.

⁹¹ First Priority Domestic items are those delivered as a rule on the first working day following the day on which they are submitted for delivery within the country.

3.2. The Market for Universal Service

In general terms, the Greek market for US is expected to follow broadly the same growth path, as was the case with the other, proportionately larger, European Union (EU) markets. In addition, it is estimated that in the course of the next years the volume of US postal items will continue to rise at an annual increase rate that will exceed the increase rate in the volume of the EU market for US. This is attributed to the fact that the postal markets in most EU countries are already very developed compared to Greece, on the one hand, and to the lower penetration rates of electronic mail and electronic commerce in Greece, on the other.

Given that the use of electronic mail refers mainly to communications between businesses and that, on a global level, 30% of the market for US refers to business-to-business (B2B) transactions; it is likely that in the medium-to-long term this parameter will restrict the growth of the market for US.

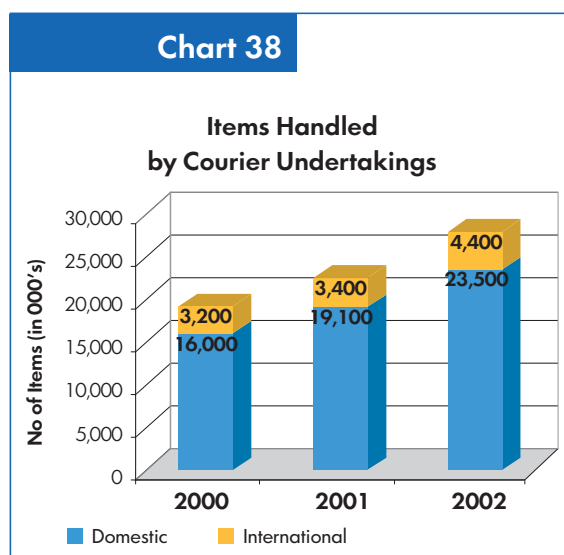
Similarly, the fact that ELTA, as the single USP in Greece, pursuant to Law 2668/1998, is already well established and offers extensive geographical coverage is also considered to be an inhibiting factor. Thus, the “barriers to entry” for the Greek market for US are high for new entrants.

3.3. The Market for Courier Services

The market for courier services in Greece is growing at a fast rate, both in terms of absolute figures (number of undertakings, volume of postal items handled, transportation equipment, area of storage spaces) and in terms of quality and reliability of the services provided (delivery times for postal items, organisation of undertakings and establishment of networks).

The number of undertakings enrolled in the Postal Undertakings Registry maintained by EETT during the period 1999-2002 grew by around 90%. Of these, according to EETT data, a significant number of licensed undertakings are handling a very small volume of postal items, something that gives rise to concerns regarding the viability of these undertakings in the future. More specifically, 85% of the undertakings handled, on average, 18% of the volume of postal items during 2002.

The main volume (over 70%) of the items handled, both within the country and abroad, is handled by fewer than ten undertakings. More specifically, during 2002 4% of the undertakings handled 75% of the volume of postal items. Five undertakings alone handled more than 1,000,000 postal items.



During the period 1999-2002, the leading undertakings in terms of the volume of postal items handled increased their presence in the market, and at the same time enlisted a significant number of - primarily small - undertakings, which operated under their orders and on their behalf. During 2002, the indicators regarding the speed of handling

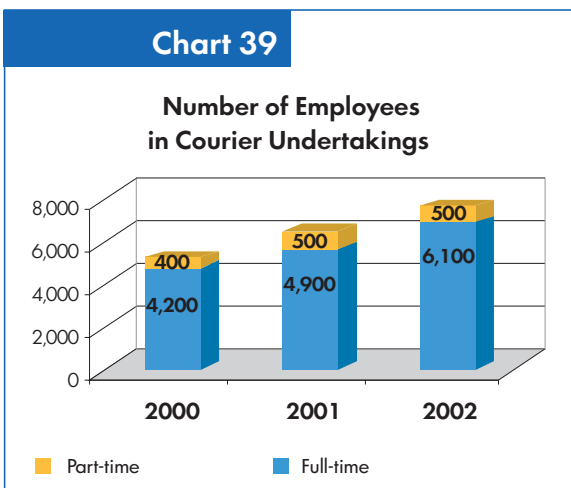
postal items within the country changed marginally compared to 2001 (see Table 16).

Table 16

Speed of Delivery for Domestic Postal Items by Courier Undertakings 2000 - 2002
(over the total items handled during the year)

	2000	2001	2002
Same-day	8%	7%	8%
In 1 day	81%	86%	83%
In 2 days	5%	5%	6%
In 3+ days	6%	2%	3%

It is interesting to note here that there was a significant increase in the number of the persons employed in courier undertakings (see Chart 39). From the above, it is obvious that the intensification of competition, the ever-increasing requirements of consumers for reliable and high-quality services, and the need for undertakings to invest in modern infrastructures, will progressively restrict the scope for independent activities by small undertakings and will force them to get integrated into larger undertakings.



4. Universal Service

Access by all citizens, regardless of their location within the Greek territory, to a basic level of services at affordable prices, is achieved through the concept of the US. The above conditions are ensured through the development of the necessary postal infrastructure, which is a top priority for every country.

In accordance with Law 2668/1998, provision of US in Greece has been assigned to ELTA, which is under obligation to provide US of a given quality and at a specified price to all citizens, as well as access to the ELTA network, regardless of geographic location, or of access costs for ELTA or of the use of the service by the citizens. Under this operating regime, ELTA implements the State's social policy by differentiating the criteria used in the performance of its activities from the pure business-driven ones as imposed by the full liberalisation status.

According to Law 2668/1998, the right of users to US is guaranteed through the following:

- Specification of the density of access and collection points based on users' needs.
- Performance of one collection and one home delivery for every user of postal services, at least five days per week.
- Provision of similar services under comparable conditions to all users.
- Provision of services without discrimination, especially on grounds of political belief, religion or ideology.
- Uninterrupted provision of services, with the exception of force majeure circumstances.
- Provision of services capable of meeting users' technical and financial capabilities, living conditions and needs.

Table 17

Universal Service Postal Traffic 2000 - 2002
(number of postal items)

	2000	2001	2002*
Total	571,779,818	582,212,123	597,786,137
Annual change	-	2%	3%
Change against 2000	100	102	105

* Estimate (actual data for the first nine months, forecasts for the last quarter)

Table 18

Universal Service Revenues
2000 - 2002

	2000*	2001*	2002**
Total (euro)	257,594,529	301,389,473	348,742,508
Annual change	-	17%	16%
Change against 2000	100	117	135

* Figures for 2000 and 2001 are based on recently reported financial accounts

** Estimate (actual data for the first nine months, forecasts for the last quarter)

4.1. Universal Service Quality

Ministerial Decision 79293/2000 determines the quality specifications and terms under which US is to be provided to citizens. These quality specifications refer to a specific handling speed and to a specific reliability level (also measured in terms of handling time) for the delivery of First Priority (Domestic and International) mail.

The quality control regarding US provision, which is a responsibility of EETT, refers precisely to measuring the handling times (speed and reliability) for the above-mentioned mail.

4.1.1. Postal Services Quality Measurement Standard

In November 2002, the Committee provided for by article 21 of Directive 1997/67/EC of the European Parliament and of the Council, adopted the proposal by the European Commission concerning taking over of the EN13850:2002 standard by member states.

The above standard determines the specifications for measuring the quality of postal services in the framework of the US; more specifically, it defines the method for measuring the time elapsing between posting and delivery for First Priority mail.

For domestic services, it was decided that as of 1 January 2004 member states should ensure that performance monitoring is carried out in accordance with the above standard. For cross-border services, 1 January 2005 was set as the date by which member states shall carry out performance monitoring, contracting independent entities for this purpose.

Adoption of the standard is mandatory for the member states and is of decisive importance, as the application of the standard is expected to:

- Increase the reliability of USPs.
- Pave the way for adoption of the other European standards concerning the quality of postal services.
- Emphasise the significance of European standardisation activities regarding postal services.

So far, the European Committee for Standardisation (CEN), has approved seven European standards concerning postal services, and is expected to approve more in the immediate future.

4.1.2. Universal Service Quality Specifications

Ministerial Decision 79293/2000 specifies, inter alia, the performance standards for delivery within one and three days of posting (D+1 and D+3)⁹² for First Priority Domestic mail and First Priority International mail.

The quality specifications (delivery performance standards for domestic mail) on the basis of which US is to be provided within the Greek territory, have been set for 2002 to 77% (for delivery within one day of posting) and to 90% (for delivery within three days of posting) for First Priority Domestic mail.

Correspondingly, the quality specifications for international mail as set for 2002 by the above Ministerial Decision vary from 68% to 95%, depending on the EU country concerned and on the relevant delivery time (D+3, D+5). It should be noted that, as regards international mail, the delivery performance rates provided for by Directive 1997/67/EC are 85% for delivery within three days of posting (D+3) and 97% for delivery within five days of posting (D+5), for both incoming and outgoing mail.

4.1.3. Results of Universal Service Quality Measurements

In the framework of monitoring the quality of domestic US, EETT appointed, in accordance with the provisions of Ministerial Decision 79293/2000, an independent entity, which undertook the performance of measurements and the calculation of results.

In cooperation with this entity, a suitable system consistent with the Ministerial Decision was designed, and is used as the basis for monitoring the quality in the provision of US. The measurement system was applied on 1 January 2002, and the results of measurements for the first and second semester of 2002 were published in November 2002 and March 2003, respectively.

The results of the measurements conducted for the first and second semester of 2002, compared against the rates set by the Ministerial Decision, are the following:

	Obligation under Ministerial Decision 79293/2000	ELTA Results	
		1 st Semester 2002	2 nd Semester 2002
D+1	77%	48.69%	46.92%
D+3	90%	90.86%	89.01%

For international mail, the data used, always in accordance with the above Ministerial Decision, are those published by the International Post Corporation (IPC). According to the results of quality measurements for First Priority International mail published by IPC for 2002, ELTA complies with the quality specifications as set by the Ministerial Decision for outgoing mail, but is lagging behind in terms of incoming mail quality.

⁹² Where D is the date of posting.



On the basis of the above, it follows that during 2002 the USP did not provide US at the quality specified by the above Ministerial Decision. For this reason, EETT has initiated the relevant audit procedures, as provided by Law 2668/1998.

4.2. Costing System and Tariffs of the Universal Service Provider

The establishment of US tariffs is subject to specific commitments, of which the most important are the following:

- ▶ Cost-orientation.
- ▶ Transparency.
- ▶ Uniform and non-discriminatory pricing across the country, ensuring equal treatment and access to US by all users at affordable prices.

The degree of compliance with the above obligations is audited by EETT. The cost of US, based on which tariffs are established, results from the costing system approved by EETT and is based on a proper management framework.

EETT had approved the costing system of ELTA since early 2001, and in 2002 proceeded to evaluate whether the cost of US is established on the basis of a framework of proper management. For this purpose, EETT used the Aggregate Inferred Productivity Index (AIPI), defined as the percent annual change in the volume of services or products produced, subtracting the corresponding percent annual change of operating expenses in current prices.

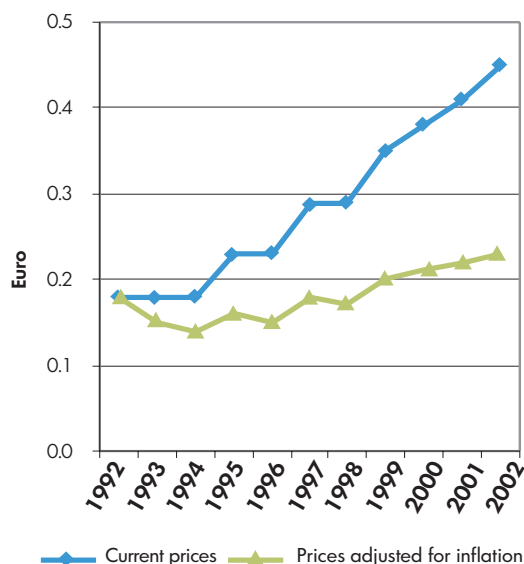
EETT calculated the AIPI retrospectively for the period 1996-2001, and in advance for 2002, in order to obtain the full picture on the cost of US.

The Charts that follow present the evolution over time of ELTA tariffs for two of the most important services under the US, namely First and Second Priority Domestic letters weighing up to 20 grams.



Chart 40

Evolution over Time of Tariffs for First Priority Domestic Letters with a Maximum Weight of 20 grams



5. Ensuring Smooth Operation of the Courier Services Market

The survey of the postal undertakings active in the courier services market and the data gathered for the last three years (1999-2002) have highlighted the problem of fragmentation in this area and the existence of a large number of small enterprises operating at levels that do not guarantee their viability. Moreover, the need has emerged for instituting procedures and measures for upgrading the quality of the services provided.

The issue of Ministerial Decisions further specifying in detail the articles of Law 2668/1998, and the creation in EETT of a Licensed Postal Undertakings Registry, established the framework for smooth operation of the courier market.

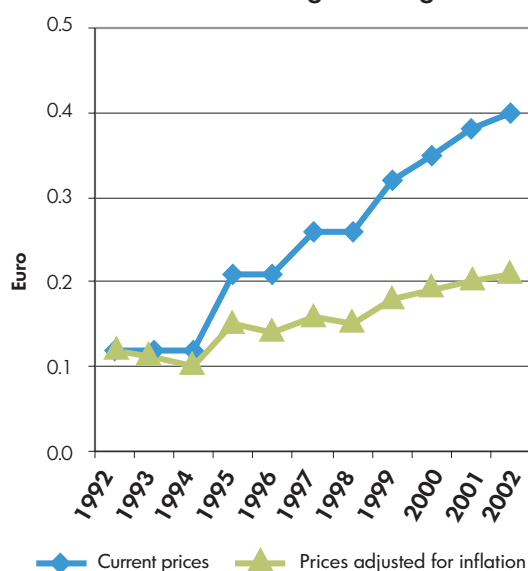
In this framework, EETT specified the conditions under which an undertaking may operate lawfully without having been issued with a licence, if its activities are carried under the orders and on behalf of some other licensed undertaking (i.e. forms part of that licensed undertaking's Network). In this case, responsibility and liability for all items related to the postal services offered by such undertaking - i.e. commercial policy, price lists, Charter of Obligations to the Consumer, price lists, Charter of Obligations to the Consumer, notes to and from the customer, invoices to the customer etc. - rest with the licence owner. The licensed undertaking is under obligation to notify EETT about its Network.

Furthermore, in 2002 EETT initiated the procedures concerning:

- Identification and audit of courier services undertakings that operate without having been registered with EETT's Postal Undertakings Registry.
- Improvement of the quality of the services provided, through the development of model forms for Individual Agreements (Vouchers) and the Charter of Obligations to the Consumer.

Chart 41

Evolution over Time of Tariffs for Second Priority Domestic Letters with a Maximum Weight of 20 grams



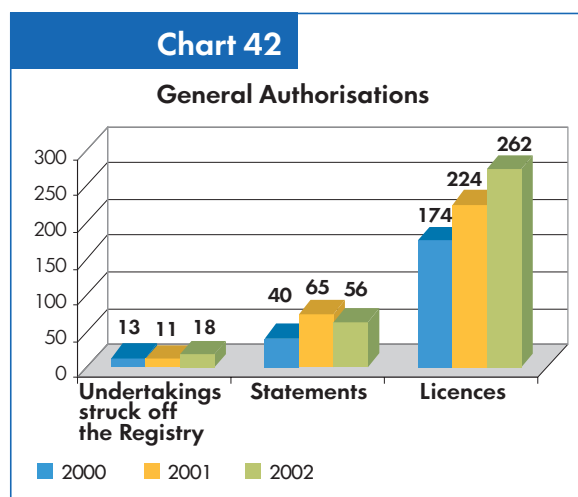
- ▶ Tracking and tracing of postal items through the development of a Special Track-and-Trace System, as provided for by the Law for courier services. This System will offer value-added services in connection to the US and will ensure efficient operation and interconnection of the networks of postal undertakings.

5.1. Licensing

In the postal market, the sector of courier services is fully liberalised. Provision of courier services as a professional activity presupposes ownership of a General Authorisation or inclusion of an undertaking into the Network of some other EETT-licensed undertaking.

General Authorisations are granted by EETT, in accordance with the terms and conditions described in Ministerial Decision 57810/1999, and all undertakings are subject to the same legislation.

In 2002, the number of postal undertakings licensed under General Authorisation status and enrolled in the EETT Registry amounted to 262. During the year, Individual Licences were granted to 56 undertakings (out of a total of 87 applicants), which fulfilled the criteria provided for by the legislation (see Appendix V).



5.2. Charter of Obligations to the Consumer

In 2002, taking steps to better organise the postal services sector and especially the fast-growing courier services sector, EETT focused on auditing the quality of the services provided by courier undertakings, placing at the same time particular emphasis on the extent to which these undertakings observe their obligations to the consumer.

In this framework, a relevant survey was conducted of the postal undertakings enrolled in the EETT Registry, with the aim to examine and identify key deficiencies in the Charters of Obligations to the Consumer and in Individual Agreements. It was established that the existing Charters of Obligations to the Consumer and Individual Agreements exhibit significant deficiencies and inconsistencies in key points as to the terms that they contain. Thus, consumers are not safeguarded in their transactions with postal undertakings and do not have the possibility to compare the services provided prior to selecting the undertaking on which to assign the dispatch of postal items.

Given that the act of publicising the Charter of Obligations to the Consumer commits undertakings to observe the obligations deriving therefrom, EETT is conducting a study, currently in progress, on the drafting of model documents for Individual Agreements and for the Charter of Obligations to the Consumer, which will specify a minimum level of obligations that all undertakings will assume towards the users.

With these actions, EETT aims at safeguarding the rights of users and providing them with adequate information. This, in combination with the increasing needs of users, will contribute to strengthening competition and will result in improving the quality of the services provided.

6. Control - Supervision of the Market of Postal Undertakings

6.1. Value-Added Services offered by Postal Undertakings

According to Law 2668/1998, key aspects in the concept of courier services and an element that differentiates the undertakings providing such services from the USP are the speed in forwarding a postal item and the existence of a Special Track-and-Trace System capable of following the progress of a postal item through all handling stages, from sender to addressee.

The capability to trace a postal item through all stages, the time within which an undertaking is able to track an item, if needed, but - chiefly - the method and the resources used for this purpose, are elements of decisive significance for that undertaking's level of organisation and for the quality that the undertaking provides in handling postal items.

Moreover, the Track-and-Trace System contributes added value to the service offered as compared to the US. Specification of the features of the Special Track-and-Trace System is therefore considered necessary. Following a survey conducted of the undertakings enrolled in the Registry, it was established that in their entirety - with only a few exceptions - they have not developed a system with the capacity to monitor all stages in handling postal items and to safeguard users.

For this reason, EETT commissioned a study, currently in progress, on the establishment of a "Framework for a Track-and Trace System for Postal Items" that will set the minimum requirements that must be met in order to allow tracking of postal items.

Installation of an information system of this type by undertakings will in the future be a prerequisite for granting or renewing General Authorisations by EETT.

The above System will significantly contribute to the improvement of the quality of the services provided, and will in parallel solve many of the problems arising from the creation of networks of postal undertakings, as these have been specified by EETT.

6.2. Requests - Complaints

As already mentioned in sub-section 1.4.3., EETT established a suitable infrastructure for managing more efficiently the requests/complaints submitted by consumers and undertakings. During 2002, EETT received more than 350 requests/complaints by private individuals and postal undertakings, mainly concerning issues of quality in the provision of services and observance of obligations by postal undertakings. More specifically, these were complaints by postal undertakings against other postal undertakings, and complaints by consumers for violations of the legislation in the provision of postal services.

In the cases where settlement through the Dispute Resolution Committee, established by the undertakings in accordance with the provisions of their Charter of Obligations to the Consumer, was not possible, EETT proceeded to hold Hearings with the participation of the parties involved in all audit stages.



6.2.1. Administrative Penalties imposed on Postal Undertakings during 2002

Table 20		
List of Fines		
Company	Reason	Fine (euro)
ABARTSIDIS ALEXANDROS	Provision of postal services without General Authorisation or Individual Licence	14,675
L. ARMAOS - I. FYRIGOS LTD	Provision of postal services without General Authorisation or Individual Licence	14,675
ACES COURIERS TRANSPORTATIONS OPERATIONAL SERVICES S.A.	Inadequate provision of postal services	15,000
VOVOS THEODOROS	Provision of postal services without General Authorisation or Individual Licence	14,675
DORDIOU DESPINA	Provision of postal services without General Authorisation or Individual Licence	14,700
DORLI EVGENIA	Provision of postal services without General Authorisation or Individual Licence	14,675
ELTA	Low performance levels in the delivery of incoming First Priority International mail	200,000
ELTA	Inadequate provision of US postal services	14,675
THEOFILOU ZOI	Provision of postal services without General Authorisation or Individual Licence	14,675
KIOULAFIS THEODOSSIOS	Provision of postal services without General Authorisation or Individual Licence	14,675
KISSOUDIS PASCHALIS - VERGINA	Provision of postal services without General Authorisation or Individual Licence	14,675
METOCHIANAKIS ILIAS	Provision of postal services without General Authorisation or Individual Licence	14,675
POLYZOPOULOS APOSTOLOS	Provision of postal services without General Authorisation or Individual Licence	15,000
TNT SKYPACK (HELLAS) LTD	Breach of terms under the Charter of Obligations to the Consumer	14,675
FLASH RUNNER COURIER SERVICES LTD	Provision of postal services without General Authorisation or Individual Licence	14,675
SPEEDEX - COURIER SERVICES S.A.	Breach of terms under the Charter of Obligations to the Consumer	25,000

Table 21	
Table of Recommendations	
Company	Reason
ELTA	Inadequate provision of postal services
ZACHARIOU MARIA	Provision of postal services without General Authorisation or Individual Licence
TRIANTAFYLLIDIS ANESTIS	Provision of postal services without General Authorisation or Individual Licence
SPEEDEX - COURIER SERVICES S.A.	Inadequate provision of postal services

7. Other Actions

7.1. Postal Undertakings Information Day

EETT sees to it that postal undertakings are informed of developments in the market, that there is exchange of views on issues of concern to users and providers of postal services, and that the problems arising in the day-to-day operation of postal undertakings are recorded.

In this framework, on 19 February 2002 EETT organised in the Ministry of Transportation and Communications a meeting on "Postal Market Survey - Prospects for Growth", attended by all Greek postal undertakings and by the Ministry's political leadership.

7.2. Announcements of Public Interest

Pursuant to the provisions of Law 2668/1998 and Ministerial Decision 79293/2000, EETT made the following announcements / publications:

- Publication of US quality measurement results for First Priority Domestic mail for the first semester of 2002.
- Publication of quality measurements for International mail for the first semester of 2002, for all EU member states.

EETT also publicised studies/surveys of postal interest which it conducted, such as:

- Survey on gathering statistical data concerning postal undertakings for 2000 and 2001.
- Survey on the Special Track-and-Trace System for Postal Items, as used by undertakings in the sector today.
- Survey on the Charter of Obligations to the Consumer and Individual Agreements of postal

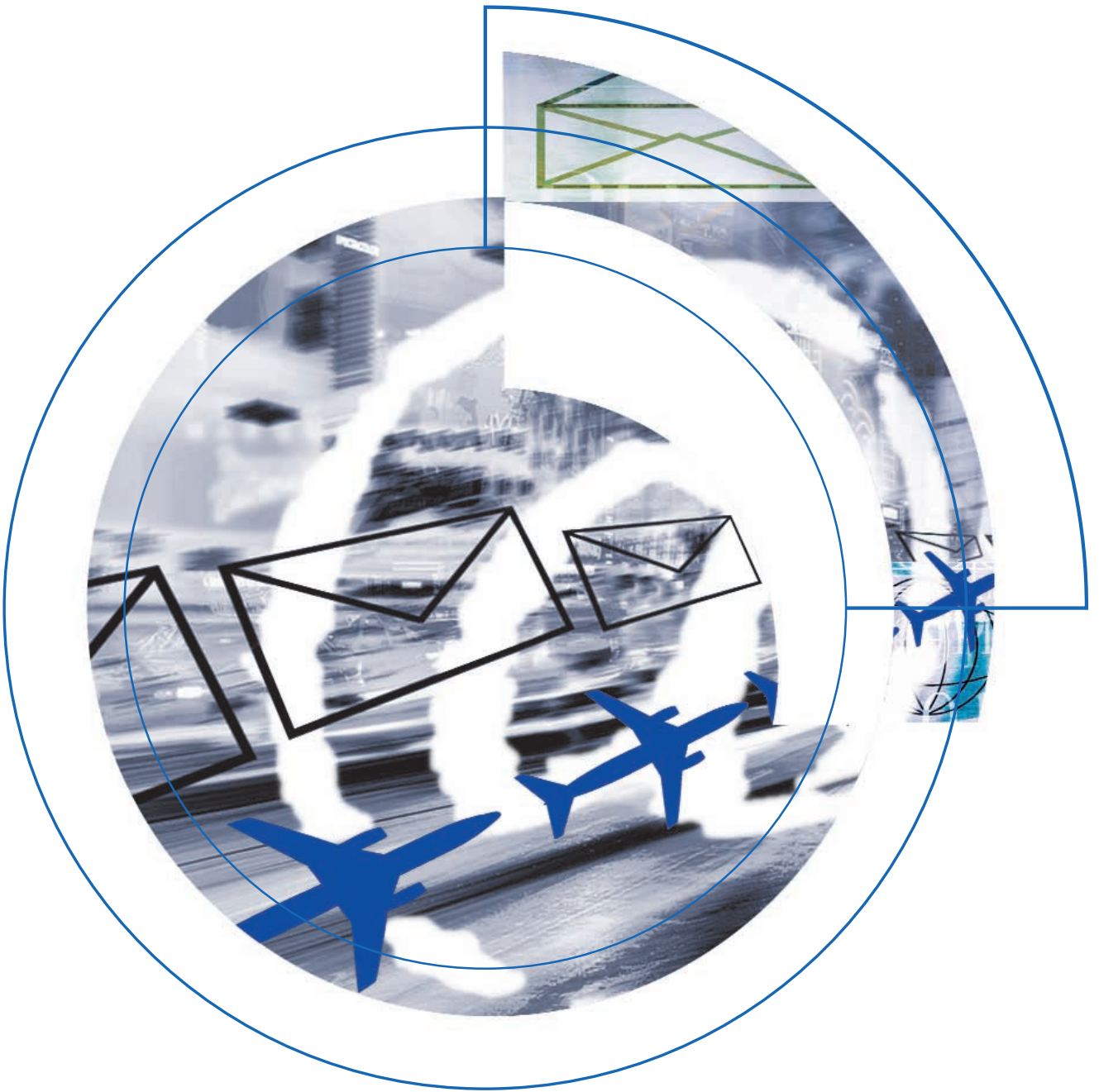
undertakings, for which comments and proposals were invited from the undertakings involved.

EETT will use the conclusions of the above surveys in the near future to draw up new decisions that will regulate the operation of the postal market and will meet its modern needs.

8. Goals

The main goals of EETT for 2003 are as follows:

- To draw up regulations on granting General Authorisations and Individual Licences on the basis of the new institutional framework introduced to Parliament, with the aim to apply this framework effectively.
- To prepare the postal services market for the new liberalisation stage to take place in 2003.
- To ensure US quality through the application of the EN 13850:2002 measurement standard of the EU.
- To develop and apply new model documents for the Charter of Obligations to the Consumer and for Individual Agreements, to protect the interests of consumers.
- To develop the specifications for a Special Track-and-Trace System for Postal Items, to be implemented by courier services.
- To codify the postal services offered according to type and location, with the aim to provide a better and faster service to users.
- To design a system for gathering information from the entities active in the postal market, with the aim to monitor market development, trends and prospects.
- To design a system for identifying and auditing illegally operating undertakings, and to automate market supervision procedures.
- To contribute, in the framework of its responsibilities, to the preparation of the market in view of the 2004 Olympic Games.
- To organise a postal undertakings Information Day, with the aim to exchange information on the development and trends of the postal market.



The National Telecommunications & Post Commission (EETT)



C. The National Telecommunications & Post Commission (EETT)

1. Introduction

Pursuant to Law 2867/2000, EETT is established as an Independent Administrative Authority enjoying administrative and financial independence. Its main responsibility is to supervise, control and regulate both the telecommunications market and the postal services market in Greece.

The establishment and operation of EETT are regulated by legislative acts, in full compliance with the constitutional principles concerning organisation and staffing of Independent Administrative Authorities⁹³. An important factor enabling EETT to effectively exercise its regulatory and supervisory role to the benefit of consumers and the market is its smooth internal operation to high professional standards, and the employment of suitable personnel capable to respond to the obligations of the Authority's task.

EETT is primarily composed of the Commission members, the Special Experts and the Permanent Personnel. The Commission consists of nine members, selected by the Conference of the Presidents of the Parliament and appointed by virtue of a Decision of the Minister of Transportation and Communications. The President, the Vice-President for the Sector of Telecommunications and the Vice-President for the Sector of Postal Services are appointed as full-time public functionaries whose office is incompatible with the exercise of any public function or professional activity other than teaching.

These persons are recognised authorities and are distinguished for their professional qualifications in the technical, financial or legal field. Law 2867/2000

guarantees the independence of EETT, providing that its members enjoy full personal and operational independence in performing their duties and are obliged to observe the principles of objectivity and impartiality.

Sub-section 2.1. presents information on EETT's Special Experts and Permanent Personnel.

2. Organisation

The implementation of Presidential Decree (PD) 387/2002⁹⁴ on the internal structure of EETT and the qualifications and selection method for its Heads of Department, is expected to play an important role with regard to the enhanced organisation and efficient operation of EETT. This PD has helped set out an organisational structure that is appropriate for EETT.

More specifically, the following are established: (a) the organisational structure of EETT; (b) the allocation of responsibilities among Departments; and (c) the qualifications required and the method in which responsibility positions are filled. EETT intends to promptly implement the above-mentioned PD.

2.1. Staffing and Development

During 2002 EETT continued the recruitment of suitably qualified personnel, capable of responding to its increased needs. Assignment of the personnel to sectors of activity was carried out as determined in the PD under publication on the organisation of EETT.

⁹³ Article 101 A of the Constitution as last amended (Resolution of the Seventh Revisionary Parliament of the Hellenes, FEK Issue 84/A/17-04-2001).

⁹⁴ PD 387/2002 (FEK Issue 335/A/31-12-2002) on the "Internal structure of the National Telecommunications and Post Commission (EETT), qualification and selection method for Heads of Department and other relevant provisions".

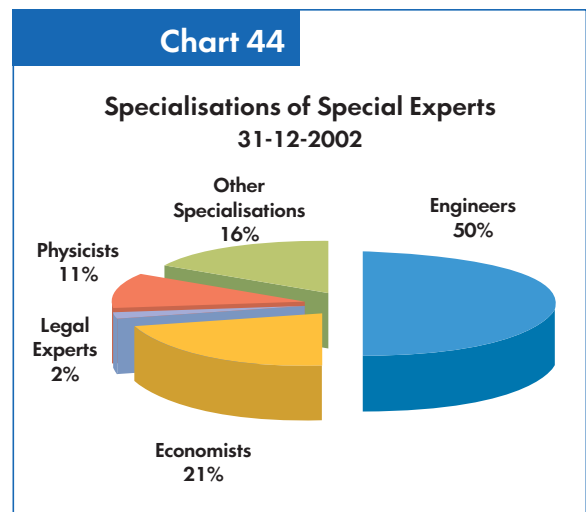
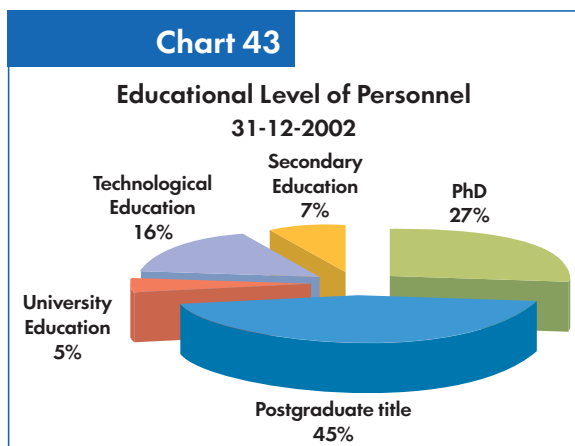
As a result of the above, the total number of EETT personnel at the end of 2002 rose to 110 employees, compared to 78 employees at the end of 2001. Of these, 91 were employed on a full-time basis and 19

were external associates - members of Working Groups. The evolution of EETT's human resources and their educational level are shown in Table 22 and Chart 43, respectively.

Table 22					
Evolution of EETT Human Resources					
	31-12-1998	31-12-1999	31-12-2000	31-12-2001	31-12-2002
Special Experts	-	-	26	37	56
Permanent Personnel with University Education	-	-	-	3	4
Permanent Personnel with Higher Technological Education	-	-	6	6	17
Permanent Personnel with Secondary Education	-	-	1	4	6
Personnel under Secondment	1	1	2	6	6
Personnel made temporarily available from other Organisations	12	13	1	2	2
Members of Working Groups *	4	4	12	20	19
Total	17	18	48	78	110

* Associates participating in Working Groups

On 31 December 2002, Special Experts numbered 56 scientists, who in their majority were engineers, physicists and economists. Their breakdown by specialisation is shown in Chart 44.



It should be noted that EETT aims to conclude the procedures for its staffing, pursuant to PD 387/2002, by the end of 2003.

2.2. Training

Recognising the importance of providing its staff with continuous training on issues related to the telecommunications and postal markets, and in order to maintain their high level of qualifications, EETT organised during 2002 a number of training seminars that were mainly addressed to Special Experts. This cycle of training seminars included broader telecommunications issues and covered three subject areas: (a) telecommunications issues; (b) economic aspects of the telecommunications markets; and (c) spectrum management issues.

In parallel, the following specialised seminars were conducted:

1. Market Definition and Significant Market Power in Telecommunications

The aim of this seminar was to present and discuss the economic parameters regarding the implementation of the new European Union (EU) Regulatory Framework concerning telecommunications, and their application in the Greek telecommunications market.

2. Committees and Comitology

The aim of this seminar was to discuss the operating procedures of, and the role played by the committees operating in the framework of the EU. The presentations given and the simulation exercises conducted helped to understand the role of member states in the decision-making process.

3. Basic cost-auditing principles using the Long-Run Average Incremental Costs (LRAIC) costing model based on the Top-Down (accounting) method and the Bottom-Up (technical/financial) method.

During the same period, members of EETT staff attended seminars conducted in other EU countries on spectrum management issues for

satellite and land-based networks, as well as on corporate communication issues.

In addition, a number of Roundtable Discussion Series were organised on EETT's initiative. In this framework, a visit by representatives of the European Commission's Directorate-General on Information Society took place in May 2002. The briefing concerned the application of the new Regulatory Framework by the National Regulatory Authorities (NRAs).

Furthermore, in November 2002 a visit by representatives of the European Commission's Directorate General on Competition took place, concerning the following issues:

1. The Commission's guidelines on market analysis and the assessment of Significant Market Power (SMP).
2. Commission Recommendation on relevant product and service markets within the electronic communications sector susceptible to ex ante regulation in accordance with Directive 2002/21/EC.

The goal of EETT for 2003 is to develop and establish an integrated training programme on a permanent basis. Relocation to its own premises remains one of the main goals of EETT, and the procedures for conducting a relevant public tender have already commenced.

3. Organisational Development of the Spectrum Directorate

According to PD 387/2002 on the internal structure of EETT, primarily the Spectrum Directorate deals with radio spectrum issues.

EETT, taking into consideration: (a) the volume of applications concerning granting of licences for spectrum usage; (b) the importance of effective regulation of the relevant issues to the operation of the telecommunications market; and (c) its intention to harmonise spectrum management practices and regulations with the best practices as applied by other European countries, conducted a public tender procedure and assigned to a consultant the project of organising the Spectrum Directorate. This particular project has been submitted for inclusion in the Operational Programme "Information Society" (OPIS) under 3rd Community Support Framework (CSF III).

The Contractor will implement the following individual phases:

- Evaluation of current situation.
- Presentation of European practice and experience.
- Drafting of proposals on action plans.
- Drawing up of draft regulations to cover all EETT responsibilities in the radio spectrum area.
- Proposals on the development of an organisation plan for the Spectrum Directorate, also taking into consideration the relevant PD.
- Development of model forms.
- Assessment of needs in staff resources.
- Examination of training requirements and proposals on a training plan.
- Provision of support to EETT in connection with the implementation of the proposed organisational scheme.

Implementation of the first two stages had taken place by the end of 2002, and the project is to be completed by the summer of 2003.

4. EETT Management Plan 2003-2005

The period 2003-2005 will be of particular significance for increasing the competitiveness of the Greek telecommunications market, and EETT shall play a decisive role, in terms of both ensuring smooth operation of the market and promoting consumer rights. In order to better perform its tasks and carry out its responsibilities more effectively, EETT developed in 2002 a Management Plan for the next three years (2003-2005).

The Plan is indispensable for establishing the strategic directions of EETT, whose attainment is made possible by the implementation of specific action plans. The importance of the Management Plan and its necessity for the next three years lies in the fact that it establishes the framework for the operation and growth of EETT, by defining the Authority's policies, directions and actions within a predetermined time-horizon.

The strategic directions were established on the basis of the requirements of the environment within which EETT operates, which is external to the Authority, combined with the assessment of EETT's internal needs, which to a certain degree also depend on external requirements. Strategic directions helped in turn identify the areas on which the actions undertaken by EETT will focus, and thus the areas to which the Authority's resources will be primarily directed.

The strategic directions for the period 2003-2005 are the following:

1. Safeguarding consumer rights and consumer protection in the telecommunications and postal services sectors.
2. Ensuring provision of high-quality services by EETT to consumers and providers of telecommunications and postal services.
3. Development of the telecommunications market through the introduction of modern networks and

innovative services which provide capabilities for easy access to all.

4. Promotion of fair competition in networks and services.
5. Safeguarding the operation of the telecommunications market sector in accordance with the principles of competition.
6. Ensuring provision of Universal Service (US) in the telecommunications and postal services sectors.
7. Optimal utilisation of the radio spectrum and safeguarding of its legitimate use.
8. Ensuring that the telecommunications equipment used meets the appropriate specifications.
9. Effective management of the radio communications environment during the 2004 Olympic Games.
10. Ensuring that the gradual and controlled liberalisation of the postal market takes place in accordance with the principles of competition.
11. Improvement in the quality of the postal services provided.
12. Strengthening of EETT relations with corresponding NRAs abroad, and increasing the participation of EETT in international decision-making bodies.
13. Recognition of EETT as an Independent Authority providing high-quality services.
14. Ensuring the organisational structures and infrastructures that allow EETT to successfully carry out its activities and meet its goals.

In order to pursue the above strategic directions, specific projects were identified and specifications were established for their implementation, which will take place in the course of the next three years.

After the first six months of implementation of the Management Plan, an assessment exercise will be conducted, addressing issues related to progress, the need to redefine projects and the identification of new needs that will have resulted from anticipated changes in the institutional framework and from advances in technology.

5. "Information Society"

The OPIS under the CSF III consists of a series of interventions in various areas of economic and social activity, so that these have a catalytic effect on the development of the Information Society in Greece. Communications are one such area, and constitute one of the key action lines of the Operational Programme (OP).

In the framework of developing its Business Plan for its participation in the OPIS, EETT has identified the following two Strategic Action Lines, whose implementation falls within the targets and goals of the OP:

Strategic Action Line 1: Modernisation of structures and implementation of mechanisms for radio spectrum management

Strategic Action Line 2: Improvement of the effectiveness of EETT's operation

In order to attain the goals of the above Strategic Action Lines, several projects of special importance to EETT have been identified, followed by the development of detailed implementation plans. At the same time, a management and monitoring mechanism was set up for these projects, staffed by EETT personnel.

The above mechanism has been entrusted with the following responsibilities:

- Forwarding for approval for funding of the projects specified in the EETT Business Plan, as well as of other projects that will emerge in the future and that are considered to be compatible with the OPIS goals.
- Ensuring that the projects are awarded and implemented in compliance with the requirements of the OPIS Managing Authority.
- Monitoring of physical and economic progress of projects, and ensuring observance of the

technical, financial and time-related specifications set out in the EETT Business Plan.

- ▶ Meeting the obligations deriving from the CSF III Regulations.

The budget of the projects that have been included under each of the above Strategic Action Lines is the following:

Strategic Action Line 1: 33,211,600 euro

Strategic Action Line 2: 12,424,787 euro

The Business Plan developed by EETT for the projects included in the OPIS was presented in the framework of a Public Consultation, approved and officially submitted to the OPIS Managing Authority. According to the OPIS Programming Document⁹⁵, EETT is implementing projects coming under Measures⁹⁶ 1 and 5 of Action Line⁹⁷ 4 (“Communications”).

The EETT projects under OPIS Measure 4.1. “Development of mechanisms for application of the institutional framework and for strengthening competition” are implemented according to plan, without deviations from the time-schedule of the approved EETT Business Plan.

Regarding Measure 4.1., the following had taken place by 31 December 2002:

- ▶ EETT had submitted Technical Project Forms for inclusion of projects that correspond to 46.3% of the total Business Plan budget.
- ▶ The projects included correspond to 34.11% of the total Business Plan budget.
- ▶ EETT had launched tender procedures for projects that correspond to 39.9% of the total Business Plan budget.

- ▶ EETT had signed contracts that correspond to 11.25% of the Business Plan budget.
- ▶ The payments made corresponded to 3% of the total Business Plan budget.

EETT is already implementing training projects, which will be submitted for inclusion under Measure 4.5. “Training of Human Resources in the Communications Sector”. In addition, EETT has already secured inclusion of the following projects/sub-projects:

- ▶ EETT Management Plan.
- ▶ Postal Market Assessment Studies.
 - Study and Survey of the Postal Market.
 - Measurement of US Quality in the postal sector.
- ▶ EETT Network Infrastructure and Equipment.
 - Procurement of EETT Electronic Equipment.
 - Procurement of EETT Network Equipment.
- ▶ National Spectrum Management and Monitoring System (NSMMS) - Phase A.
 - Technical Project Management Consultant for Phase A of the NSMMS.
 - NSMMS and Monitoring Stations for the Attica and Thessaloniki prefectures.
- ▶ Study on the Review and Determination of the Spectrum Pricing Policy.
- ▶ EETT Organisation Study.

Moreover, during 2002 EETT submitted for inclusion in the OPIS the following projects, the applications for which are currently under review by the OPIS Managing Authority:

1. Study on the Organisation, Planning and Implementation of Voluntary Accreditation of Certification Service Providers (CSPs) and on

⁹⁵ Document concerning the application of the OP strategy and priority action lines, which also contains details at the level of Measures.

⁹⁶ The means through which a priority action line is realised, which also allows funding of actions.

⁹⁷ A strategy priority selected under the CSF or under a specific OP.

other issues pertaining to the Provision of Electronic Signature Certification Services.

2. Organisation and Implementation Study for the Radio Spectrum Department.
3. EETT Integrated Information System (IIS).

Implementation of these projects has already begun, as they are of critical importance for the efficient operation of EETT.

6. International Relations

Progress in the liberalisation of the telecommunications sector is an issue of pan-European significance, extending beyond the narrow confines of national borders of EU member states. Bilateral and other collaborations, as well as uniform application of rules and procedures, are therefore essential prerequisites to the sector's further maturing and growth. In this light, EETT considers the regulatory practices followed by NRAs in other member states to be of particular significance, and participates actively in all European initiatives, as these are formulated every time, in order to meet the global challenges emerging in the sector of electronic communications.

In terms of international activities, 2002 was a particularly productive period for EETT. The increase in its human resources allowed EETT to exercise its responsibilities, including forwarding of information to the European Commission in accordance with Community legislation on telecommunications, cooperating with international bodies and representing Greece in international meetings and organisations, more efficiently.

In terms of European-level representation, EETT was active along two key directions, participating both in official Groups and Committees of the European Commission (or also of other EU agencies/bodies)

and in the Independent Regulators Group (IRG).

Regarding the first direction, EETT followed, and took active part in, the activities of the following official Committees and Groups, established by the European Commission with the purpose of further promoting issues relating to the application of relevant Community legislation:

- COmmunication COMmittee (COCOM).
- Postal Directive Committee.
- Telecommunication Conformity Assessment and Market Surveillance Committee (TCAM), concerning application of Directive 1999/5/EC.
- Administrative Cooperation (ADCO) Group.
- Open Network Provision (ONP) Committee.
- Licensing Committee (LICCO).
- Experts' Group on the implementation of the [.eu] Top Level Domain.
- Internet Informal Group (IIG).
- Informal International Affairs Group (IIAG).
- National Administrations and Regulatory Authorities (NARA) Committee.
- Electronic Communication Committee (ECC) - Frequency Management (FM) Working Group and Radio Regulation (RR) Working Group.

In the framework of the application of the new Regulatory Framework concerning electronic communication networks and services, the efforts for consistent application of rules across all member states and for adoption of a uniform approach by NRAs in addressing individual regulatory issues were intensified through the cooperation established between NRAs themselves, as well as between NRAs and the European Commission.

The new Regulatory Framework provides for the establishment of new Committees and Groups, which will advise and assist the European Commission in the consolidation of the internal

market for electronic communication networks and services. These are: the COCOM, the European Regulators Group (ERG), the Radio Spectrum Committee, and the Radio Spectrum Policy Group. EETT was represented in the first ERG Plenary session, held in Brussels in October 2002. In addition, EETT took part as an expert in the activities of the COCOM, which commenced its operations in July 2002.

The second key direction in the representation of EETT in European groups, concerned EETT's participation in the IRG, at both the level of IRG Plenary Meetings and at the level of Working Groups. Contributions by EETT included, inter alia, the exchange of experiences and practices, and its active participation in the adoption of mutually acceptable decisions concerning sector regulation issues. The main goal of the IRG is to promote harmonisation in the European market for electronic communications. The IRG practices, along with its underlying philosophy, are expected to also influence the operation of the newly-established ERG.

The European Commission, acknowledging the role of spectrum management in the economic and technological development of member states, has assumed initiatives for pan-European coordination of spectrum management on the basis of common principles. For this purpose, new Directives have been issued on the establishment of European Committees.

During 2002, EETT participated in the standing Working Committees of the ECC, which comes under the European Conference of Postal and Telecommunications Administrations (Conférence Européenne des Postes et Telecommunications - CEPT), on radio spectrum management issues. In this way, a constant flow of information is maintained, allowing EETT to keep up with, and participate in, developments. More specifically, EETT participated in the FM and RR Working Groups on licensing, labelling, and market monitoring and surveillance issues.

EETT also represented Greece in the activities of the TCAM Committee, which comes under the European Commission's Directorate-General for Enterprises (DG III), on issues resulting from the application of Directive 1999/5/EC, and in the ADCO Group, on the joint approach to addressing the problems of the European market.

Moreover, an important component of EETT's European obligations is the provision to the European Commission of data concerning the telecommunications market and the corresponding regulatory actions, in order for the Commission to draw up its Annual Report. In this context, EETT forwarded several sets of data and information for the preparation of the 8th Report. In parallel, in the framework of its responsibilities, EETT pursued its contacts, exchange of views and cooperation with individual Directorates-General of the European Commission, such as those responsible for the Information Society, Competition and Internal Market.

Throughout 2002, EETT maintained frequent contacts with its European counterparts, cooperated with them on individual issues and invited European experts and officials to provide its staff with timely updates about recent developments in the area. Of special interest were also the visits to EETT by delegations from the Balkans and the Mediterranean region, with the purpose of exchanging views on current issues of the electronic communication sector, and to train staff of newly established Regulatory Authorities in these countries. The European expertise of EETT renders it today an advisor of considerable calibre on issues related to its responsibilities, especially so for Authorities embarking now on the liberalisation of the electronic communications market. EETT continued its cooperation with competent organisations in the Balkan region, in order to settle issues concerning coordination between various types of radio communication stations. In addition, of particular interest was the MEDA regional programme of the European Commission, where EETT participated,

presenting the Greek experience on issues concerning the regulation of the market for telecommunications.

In addition, EETT participated in the survey organised by the International Telecommunication Union (ITU) with the title “2002 Telecommunication Regulatory Survey”, and in a corresponding survey conducted by the Organisation for Economic Cooperation and Development (OECD) with the title “Communications Outlook 2003”. Finally, it is worth mentioning that, in response to the obligations that derive from the ITU and concern issues of international coordination in spectrum management, EETT continued to submit its contributions through the Ministry of Transportation and Communications.

In 2003, EETT intends to continue with the same dynamism its activities regarding international relations and representation in individual Groups and Committees addressing telecommunications, spectrum and postal services issues.

7. Provision of Information

7.1. Provision of Information to Consumers

Consumers are now enjoying the benefits that result from liberalisation and of the various options available. They assume a leading role in the telecommunications market, and learn to make the choices, which suit them best, depending on their personal needs. However, this is feasible only when consumers are sufficiently aware of their rights and are informed of the options offered to them.

As also mentioned in sub-section 1.4.3., provision of information to the consumers and safeguarding of their interests are a key concern of EETT. This provision of information is achieved mainly through publication of information leaflets, implementation of

information campaigns, distribution of press releases to the Media, and publication of information on the EETT website.



In this framework, EETT published in November 2002 an information leaflet entitled on “Our Rights - A New Era in Telecommunications”, which contained information on consumer rights in telecommunications. It was extremely well received by

the public, and marked the launch of EETT’s initiative concerning publication of a series of leaflets aiming to inform consumers of various issues concerning telecommunications services and postal services.

In parallel, EETT ensures that consumer enquiries on developments in the telecommunications and postal services sectors are promptly responded to. The majority of the requests for information concerned clarifications about new services (such as Number Portability and Carrier Selection and Pre-selection), authorised undertakings, alternative providers and EETT regulations.

EETT seeks to actively involve consumers in developments. For this reason, in the Public Consultations it held during 2002 on a variety of important issues, EETT sought, in addition to the views of market players, to also record the views of consumers, in order to plan its further actions.

In connection with the above, in 2002 EETT implemented a public information campaign on the introduction of the new National Numbering Plan (NNP). The goal for EETT was to inform the citizens as extensively as possible of the changes, in order to ensure the smooth transition to the new numbering plan and the consumers’ best possible familiarisation with it.



In the framework of the information campaign conducted, the following actions were implemented: provision of information via the EETT website; display of information posters; mailing of information material to undertakings; wide distribution of an information leaflet for the public, with useful information and detailed tables showing the changes in all categories of numbers; and promotion of the changes in the Media, at both national and regional level.



The campaign was concluded successfully, establishing that the actions for provision of information to citizens, combined with timely

and proper planning of the new NNP by EETT, led to the familiarisation of citizens with the new ten-digit dialing scheme.

7.2. Provision of Information to Undertakings in the Sector

EETT aims to act in an advisory and supporting capacity to undertakings active in the telecommunications sector, in order to contribute to their smooth operation. In this framework, EETT ensures that enquiries by these undertakings are promptly answered to, providing them with accurate information.

EETT is the main reference source for information on issues related to the legal and institutional framework in force, EETT Decisions, licensing procedures, operator obligations, and technical issues. In parallel, EETT regularly informs the market of its actions and of the developments that take place at a global level, through press releases and announcements to the Media, as well as through information days and meetings held on special issues.

In this light, in 2002 EETT published the first issue of the information leaflet with the title "Communications at a glance", aiming to provide information to undertakings and the market at large.



telecommunications operators.

Moreover, an important role is that of the EETT website, which is constantly renewed and represents a key reference source and useful tool, aiming to cover the need for provision of information directly to the market and for information searches by

Finally, in February 2002 EETT organised a meeting - briefing on the "Review of the Postal Market - Growth Prospects", attended by all Greek postal undertakings and by the political leadership of the Ministry of Transportation and Communications.

7.3. Provision of Information to the Media

The aim of EETT is to be the reference source for the provision of accurate and timely information to Media representatives, given that this communication channel also achieves provision of information to the public on issues of direct interest.

EETT regularly informs Media representatives of its actions and of developments in the telecommunications and postal markets, by holding press conferences and distributing press releases on specialised issues. In addition, EETT receives enquiries by journalists almost on a daily basis, and ensures that these are promptly dealt with.

Issues that attracted particular interest from Media representatives during 2002 were the new NNP, Carrier Pre-selection and Number Portability, the mobile termination charges, the new providers of fixed voice telephony services, and issues relating to Interconnection, Local Loop Unbundling (LLU), licensing, tariffs and US.

8. Information Technology Support

Developing its activities within the dynamic and constantly evolving environment of new technologies, EETT has acknowledged the important role that information technologies play in the more efficient implementation of its tasks and in its internal operation.

In this light, EETT has defined its Information Technology (IT) support strategy for the next years. The goal is for IT to help improve the quality of the services provided by EETT and upgrade communication with organisations with whom transactions are held, and with users-consumers. In line with this strategy, the key directions on which IT support tasks focused during 2002 were the development of software and the preparations for the deployment of the EETT IIS.

8.1. Software Development

EETT developed software that allows quicker turnaround times for the following procedures:

- ▶ Radio Spectrum Management: The software supporting the licence granting procedure was upgraded, mainly by conducting studies on interference and introducing computerised calculation of radio spectrum usage fees.
- ▶ Registry of Telecommunications and Postal Undertakings: The IT support of the Registry was improved, so that statements of registration for General Authorisations are processed quickly, and the corresponding web pages containing the data of authorised undertakings are updated immediately.
- ▶ Consumer Service Section: The software development concerned computerised recording, monitoring and processing of consumer requests/complaints. The pilot application will help EETT redefine needs, in view of the implementation of the IIS (see subsection 1.4.3.).

- ▶ Internal information dissemination: An internal Intranet was developed, serving as a “central repository” for the information and know-how resulting from the performance of EETT activities. By utilising new technologies, EETT aims to provide its personnel with direct access to information on its activities and operation.

8.2. Integrated Information System

EETT is planning the deployment of an IIS that will support the performance of its activities and will improve its internal operation. The IIS aims to improve the performance of EETT and the quality of the services it provides, taking into consideration the provision of e-Government services. The functional areas, which are expected to form part of the IIS, are the following:

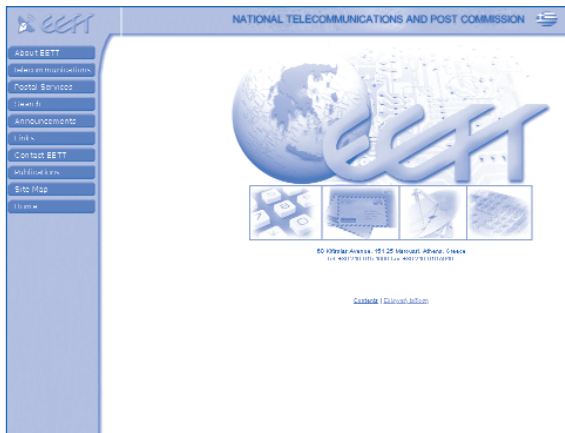
1. Management of Licences.
2. Management of scarce resources (other than the radio spectrum).
3. Market and Competition Monitoring.
4. Quality-of-Service and tariff monitoring.
5. US management monitoring.
6. Mapping of telecommunications and postal infrastructures across the Greek territory.
7. Management of Radio Equipment and Telecommunications Terminal Equipment issues.
8. Management of Electronic Signature issues.
9. Management of applications/complaints by consumers and undertakings.
10. Knowledge Management.
11. Management of Publicity Issues.
12. Protocol & Documents Management.
13. Financial Administration and Human Resources Management.
14. Management Information.
15. Internet-based information and communication.



By competitive tender conducted in 2002, EETT assigned to a Technical Consultant the project to conduct a study to establish the technical and economic specifications for the IIS, in order to proceed to a tender for implementation.

These two actions have been submitted for inclusion in the OPIS under CSF III.

9. EETT Website



In 2002, the EETT website (<http://www.eett.gr>) continued to represent an important and steadily growing channel for communication between EETT and consumers, operators and interested organisations. The number of visits to the website in 2002 was more than 150,000.

Chart 45 presents the frequency of visits compared to 2001, using the second semester of each year as the reference period. A steadily growing trend, coupled with significant differentiation, can be observed compared to the second semester of the previous year, corresponding to an increase of over 87% in the frequency of visits.

Chart 46 presents the breakdown of visits in terms of the subject areas that compose the EETT

website. The “Telecommunications Market” Area attracted most of the public’s interest.

Chart 45

**Frequency of Visits to the EETT Website
2nd Semester 2001 - 2002**

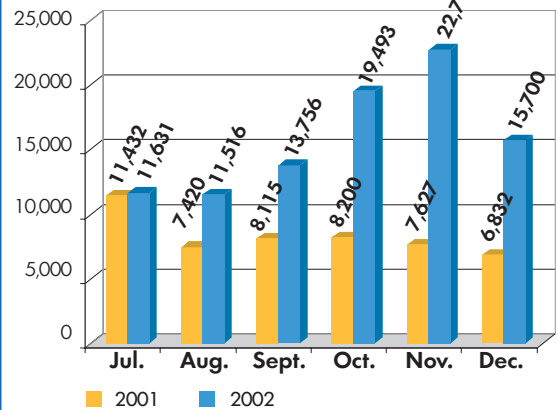
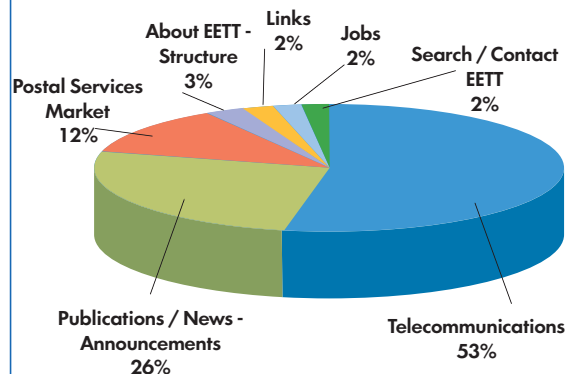


Chart 46

**EETT Website – Frequency of Visits
by Subject Area**

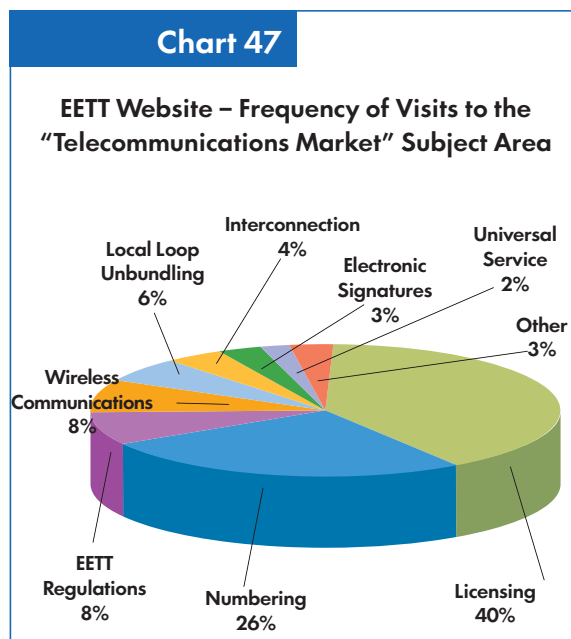


Apart from the “Licensing” Subject Area, which had the highest number of visits, a great deal of interest was recorded for the changes introduced

in the telephone dialing scheme, in the framework of completing the introduction of the new NNP. A micro-site was created especially for this purpose, and its design was coordinated with the information campaign carried out about the same issue. The relevant web pages provided useful information and user-oriented instructions concerning the changes in the dialing scheme. Chart 47 presents a breakdown of the frequency of visits in this particular Subject Area by specific sub-area accessed.

The website also contributed significantly to the licence-granting procedures conducted and to the Public Consultations held. More specifically, the website supported the procedure for granting Individual Licences for TERrestrial Trunked RAdio (TETRA) services and the procedure for Extended Global System for Mobile Communications (EGSM) spectrum assignment, as well as the Public Consultations concerning: (a) the level of competition in call termination to mobile networks; (b) introduction of Carrier Pre-selection and Number Portability; (c) provision of postal services; (d) management of [.gr] Domain Names; and (e) Interconnection issues in view of the preparation of OTE's 2003 Reference Interconnection Offer (RIO). In each case, the relevant information (Information Memoranda, Invitation to Tender documents, questionnaires and consultation results etc.) were immediately published on the website.

The interest shown in the "Publicity - News / Announcements" Subject Area, where information concerning EETT actions and various other developments is provided, was also notable. The interest recorded in the "Postal Services Market" Area, where data of authorised undertakings are given together with the relevant legislative and regulatory framework, was also important. A high frequency of visits was also recorded for the



"Jobs" Subject Area, especially so during the period in which EETT recruitment procedures were in progress.

The most important extensions to the EETT website for 2002 concerned the establishment of more efficient searches for data of authorised telecommunications and postal undertakings, and for the regulations issued by EETT.

10. Financial Statements

NATIONAL TELECOMMUNICATIONS AND POST COMMISSION									
BALANCE SHEET AS AT 31 DECEMBER 2002 - 8th OPERATING PERIOD (1 JANUARY - 31 DECEMBER 2002)									
(AMOUNTS IN EURO)									
ASSETS	Amounts for the Period ended 31.12.2002			Amounts for the Period ended 31.12.2001			LIABILITIES	Amounts for the Period ended	
	Acquisition Cost	Accumulated Depreciation	Undepreciated Value	Acquisition Cost	Accumulated Depreciation	Undepreciated Value		31.12.2002	31.12.2001
B. FORMATION EXPENSES							A. EQUITY		
4. Other formation expenses (computer SW)	134,931.86	85,401.43	49,530.43	103,131.21	62,797.85	40,333.36	IV. Reserves		
C. FIXED ASSETS							2. Extraordinary reserves	293,470.29	293,470.29
II. Tangible Fixed Assets							3. Special reserves	15,430.67	15,430.67
5. Transportation Equipment	147,317.69	66,368.97	80,948.72	127,093.11	44,512.52	82,580.59		<u>308,900.96</u>	<u>308,900.96</u>
6. Furniture and office Equipment	1,630,659.77	629,387.37	1,001,272.40	905,219.05	384,099.35	521,119.70	V. Results Carried Forward		
Total Tangible Assets (CII)	<u>1,777,977.46</u>	<u>695,756.34</u>	<u>1,082,221.12</u>	<u>1,032,312.16</u>	<u>428,611.87</u>	<u>603,700.29</u>	Profits carried forward	138,006,245.12	110,582,342.40
III. Investments and other long-term receivables							Payments from YME reserve	-1,230,759.58	-431,010.87
7. Other Long Term receivables		189,910.46			180,002.93			<u>136,775,485.54</u>	<u>110,151,331.53</u>
Total Fixed Assets (CII+ CIII)		<u>1,272,131.58</u>			<u>783,703.22</u>		Total Equity (AIV+AV)	<u>137,084,386.50</u>	<u>110,460,232.49</u>
D. CURRENT ASSETS							C. LIABILITIES		
II. Receivables							II. Current liabilities		
1. Customers		469,933.57			469,583.33		1. Suppliers	1,194,483.23	562,587.36
11. Sundry Debtors		405,134.11			346,994.08		4. Customers advance payments	73,046.70	42,207.42
		<u>875,067.68</u>			<u>816,577.41</u>		5. Taxes & Duties	153,892.66	90,696.86
IV. Cash at the bank and in hand							6. Social Security Organizations	99,006.94	46,955.72
1. Cash in hand		358.74			110.93		11. Sundry creditors	33,870.49	395,558.77
2. Current and Time deposits		135,966,901.86			110,128,033.75		Total Liabilities (CII)	<u>1,554,300.02</u>	<u>1,137,606.13</u>
		<u>135,967,260.60</u>			<u>110,128,144.68</u>				
Total Current Assets (DII+DIV)		<u>136,842,328.28</u>			<u>110,944,722.09</u>		D. TRANSIT CREDIT BALANCES		
E. TRANSIT DEBIT BALANCE							1. Revenue cashed in advance	404,762.68	344,194.78
1. Prepaid expenses		1,046.00			1,836.76		2. Accrued expenses	9,856.42	0.00
2. Deferred income		888,267.33			171,437.87			<u>414,619.10</u>	<u>344,194.78</u>
		<u>889,313.33</u>			<u>173,274.73</u>		Total Liabilities (A+C+D)	<u>139,053,305.62</u>	<u>111,942,033.40</u>
TOTAL ASSETS (B+C+D+E)		<u>139,053,305.62</u>			<u>111,942,033.40</u>		CREDIT MEMO ACCOUNTS		
DEBIT MEMO ACCOUNT							2. Credit balances of guarantees & collateral securities	27,341,302.31	14,913,752.12
2. Other debit memo accounts		147,738,772.61			142,656,921.01		2. Other credit memo accounts	147,738,772.61	142,656,921.01
		<u>175,080,074.92</u>			<u>157,570,673.12</u>			<u>175,080,074.92</u>	<u>157,570,673.12</u>
Note: The amounts under certain accounts of the Balance Sheet for the previous financial year have been adjusted to ensure compatibility with the corresponding amounts for the current period.									
PROFIT AND LOSS STATEMENT FOR THE YEAR ENDED 31 DECEMBER 2002 (1 JANUARY 2002 - 31 DECEMBER 2002)							APPROPRIATION OF PROFITS		
	Amounts for the Period ended 31.12.2002			Amounts for the Period ended 31.12.2001				Amounts for the Period ended	
								31.12.2002	31.12.2001
I. OPERATING RESULTS							Net profits before tax	27,423,902.72	17,810,935.22
Turnover (fees received)		30,306,668.54			17,958,669.96		Retaind profits brought forward	110,582,342.40	92,771,407.18
Gross margin		30,306,668.54			17,958,669.96		Profit for appropriation	<u>138,006,245.12</u>	<u>110,582,342.40</u>
Plus: Other operating income		912,856.87			2,764,813.42		Appropriated as follows:		
Total		31,219,525.41			20,723,483.38		8. Profit Carried Forward	138,006,245.12	110,582,342.40
Less: 1. Administrative expenses	8,014,354.87	-8,014,354.87		7,337,514.84	-7,337,514.84			<u>138,006,245.12</u>	<u>110,582,342.40</u>
Operating results		23,205,170.54			13,385,968.54				
Plus: 4. Interest and related income	4,211,893.91			4,426,285.26					
Less: 3. Interest changes and related expenses	1,757.28	-4,210,136.63		2,143.38	-4,424,141.88				
Total Operating Results		27,415,307.17			17,810,110.42				
II. PLUS: EXTRAORDINARY RESULTS									
1. Extraordinary & non operating income		2,077.66			613.78				
3. Income from previous periods		7,045.01			290.89				
		9,122.67			904.67				
Less: 1. Extraordinary & Non-operating expenses	83.93			79.87					
3. Expenses from previous periods	443.19	-527.12	-8,595.55	0.00	-79.87	-824.80			
Operating and extraordinary results		27,423,902.72			17,810,935.22				
Total depreciation on Fixed Assets		289,767.43			147,549.28				
Less: Depreciation incorporated in the operating cost		289,767.43	0.00		147,549.28	0.00			
NET PROFIT BEFORE TAX		<u>27,423,902.72</u>			<u>17,810,935.22</u>				
Maroussi, 18 April 2003									
THE ACCOUNTABLE FINANCIAL ADMINISTRATOR EETT CHAIRMAN							THE HEAD OF THE EETT ACCOUNTING DEPARTMENT		
EMMANOUIL GIAKOUAKIS IDENTITY NO. v 517205							GIORGOS M. ORFANOS IDENTITY NO. v 521075 ECONOMIC CHAMPER OF GREECE CLASS A REG NO. 0003970		
REPORT OF CERTIFIED AUDITOR - ACCOUNTANT									
To the "National Telecommunications and Post Commission"									
We have audited the above Financial Statements of the "National Telecommunications and Post Commission" regarding the financial administration for the period ended on 31 December 2002. Our audit was conducted in accordance with the provisions of article 13 paragraph 8 under L.2867/2000 "on the Organisation and operation of the telecommunications sector and other provisions" and with the audit procedures which we considered appropriate, according to the principles and auditing standards followed by the Institute of Certified Auditors - Accountants, which comply with the basic principles of the International Accounting Standards. The books and records kept have been made available to us and we have been provided with the information and explanations that we requested and which were required for the audit. The General Accounting Plan has been correctly applied in what regards General Accounting. The inventory valuation method applied has not been modified as compared to the previous period. We have reviewed the contents of the Annual Report of the Chairman of the "National Telecommunications and Post Commission" to the EETT Plenary. From our audit as above the following has been established: The accounts "Customers" and "Sundry Debtors" include receivables amounting to 874,315,12 euro in total from lines which were charged to the parties liable and are to be collected in accordance with the procedure provided for under the Public Revenues Collection Code. From the above amount, fines totaling 469,552.44 euro were charged to the parties liable and were included in the operating expenses for 2000, while the balance sum of 404,762.88 euro of the fines was charged to the parties liable under the present and the previous financial year and will be included in the operating fees for the financial periods during which they will be collected, while the sums corresponding to these fines are shown in the Transit Credit Balance Accounts "Revenues Cashed in Advance" under Liabilities. In our opinion, the above Financial Statements, which result from the books and records of the "National Telecommunications and Post Commission", reflect, taking also into account our remark as above, the structure of assets and the financial position of the "National Telecommunications and Post Commission" as at 31 December 2002, as well as the profit and loss account for the financial year ended on that date, in accordance with the relevant provisions in force and with the generally accepted accounting principles which do not differ from those applied in the previous period.									
Athens, 22 April 2003 The Certified Auditor - Accountant STAVROS EMM. PAPANDEKAKIS ICPA REG. NO. 14301 SOL S.A. CERTIFIED PUBLIC AUDITORS									

Appendices





Appendix I

Greek Legislative - Regulatory Framework

(as in force on 31 December 2002)

Laws

1. "Organisation and operation of the telecommunications sector", Law 2246/1994, FEK Issue 172/A/20-10-1994.
2. "On the Organisation and Operation of the Greek Telecommunications Organisation S.A. (OTE)", Law 2257/1994, FEK Issue 197/A/23-11-1994.
3. "Regulation of matters regarding Organisations and Services of the Ministry of Transportation and Communications and other provisions", Law 2366/1995, FEK Issue 256/A/12-12-1995.
4. "Listing of Shares of the Greek Telecommunications Organisation S.A. (OTE) in the Athens Stock Exchange (ASE) and other provisions", Law 2374/1996, FEK Issue 32/A/29-2-1996.
5. "Legal status of private television and local radio, regulation of matters regarding the radio-television market and other provisions", Law 2328/1995, FEK Issue 159/A/03-08-1995.
6. "Matters under the competence of the Ministry of Transportation & Communications" (Amendment to Law 2246/1994), Law 2465/1997, FEK Issue 28/A/26-02-1997.
7. "Structure and operation of the telecommunications market", Law 2578/1998, FEK Issue 30/A/17-02-1998, article 12.
8. "Organisation of the sector of postal services provision and other regulations", Law 2668/1998, FEK Issue 282/A/18-12-1998.
9. "Regulation of matters under the competence of the Ministry of Transportation & Communications and other provisions" (Amendment to Law 2246/1994), Law 2801/2000, FEK Issue 46/A/03-03-2000.
10. "Regulation on the National Telecommunications and Post Commission (EETT) and other provisions", Law 2840/2000, FEK Issue 202/A/21-09-2000.
11. "Organisation and operation of telecommunications and other provisions" (Repeal of Law 2246/1994), Law 2867/2000, FEK Issue 273/A/19-12-2000.
12. "Organisation and operation of public passenger transport using buses, technical checks of vehicles and safety of land transport and other provisions" (Amendment of Law 2867/2000), Law 2963/2001, FEK Issue 268/A/23-11-2001.
13. "Incorporation of a société anonyme banking company under the business name "Postal Bank of Greece Banking S.A." and other provisions" (Amendment of Law 2867/2000), Law 3082/2002, FEK Issue 316/A/16-12-2002.

Presidential Decrees

1. PD 437/1995 "Issuance of an Individual Licence for the installation, development, operation and exploitation of telecommunications networks and for the exercise of other telecommunications activities by the Greek Telecommunications Organisation S.A.", FEK Issue 250/A/05-12-1995.
2. PD 40/1996 "Open network provision in Leased Lines, in adaptation to Directive 1992/44/EEC as amended by Decision 1994/439/EC", FEK Issue 2/A/22-2-1996.
3. PD 424/1995 "On telecommunications terminal equipment, in compliance with Directive 1991/263/EEC as amended by Directive 1993/68/EEC", FEK Issue 243/A/22-11-1995.
4. PD 212/1997 "On the harmonization of Greek Legislation to Directive 1994/46/EC", FEK Issue 166/A/25-08-1997.



5. PD 121/1998 "Regulation on the Access to and Use of Leased Lines", FEK Issue 103/A/15-5-1995.
6. PD 122/1998 "On the equipment of satellite earth stations, in compliance with Directive 1993/1997/EC complementing Directive 1991/263/EEC", FEK Issue 103/A/15-5-1998.
7. PD 123/1998 "On the abolition of the limitations in the use of cable television networks for the provision of liberalised services, in adaptation to Directive 1990/388/EEC as amended by Directive 1995/51/EC", FEK Issue 103/A/15-5-1998.
8. PD 124/1998 "On mobile and personal communications, in adaptation to Directive 1990/388/EEC as amended by Directive 1996/2/EC", FEK Issue 103/A/15-5-1998.
9. PD 156/1999 "On the Amendment of Law 2246/1994 (FEK Issue 172/A) and of PD 40/1996 (FEK Issue 276/A), in compliance with Directive 1997/51/EC of the European Parliament and of the Council amending Council Directives 1990/387/EEC and 1992/44/EEC, for the purpose of adaptation to a Competitive Environment in Telecommunications", FEK Issue 153/A/29-7-1999.
10. PD 157/99 "Granting of General Authorisations and Individual Licences in the Sector of Telecommunications Services, in adaptation to Directive 1997/13/EC of the European Parliament and of the Council", FEK Issue 153/A/29-7-1999.
11. PD 165/1999 "On the amendment of Law 2246/1994, as in force each time, in compliance with (a) Directive 1997/33/EC on interconnection in Telecommunications, with regard to ensuring Universal Service and interoperability through application of the principles of Open Network Provision (ONP), and (b) Directive 1998/61/EC amending Directive 1997/33/EC", FEK Issue 159/A/4-8-1999.
12. PD 181/1999 "Adaptation to Directive 1998/10/EC on the application of Open Network Provision (ONP) to voice telephony and on Universal Service for telecommunications in a competitive environment", FEK Issue 170/A/20-8-1999.
13. PD 150/2001 "Adaptation to Directive 1999/93/EC of the European Parliament and of the Council on a Community framework for Electronic Signatures", FEK Issue 125/A/25-6-2001.
14. PD 342/2002 "Movement of documents via electronic mail between public services, legal persons governed by public law and Local Authorities or between these and natural or legal persons governed by private law and associations of natural persons", FEK Issue 284/A/22-11-2002.
15. PD 343/2002 "Harmonisation of Greek legislation to the provisions of Directive 1998/84/EC of the European Parliament and of the Council of 20 November 1998 on the legal protection of services based on, or consisting of, conditional access [subscription services] [Official Journal(OJ) L 320/28.11.1998, p. 54]", FEK Issue 284/A/22-11-2002.

Ministerial Decisions

1. Ministry of Transportation & Communications (MTC) Decision 68321 - "Determination of a limit for the Total Capacity of Leased Circuits", FEK Issue 500/B/6-6-1995.
2. MTC Decision 74631 - "Regulation on the Conditions and Procedure for Submission of the Statement", FEK Issue 634/B/18-7-1995.
3. MTC Decision 79097 - "Regulation on the Conditions and Procedure for Granting, Renewal, Suspension and Revocation of Licences for Provision to the Public of Telecommunications Services via leased circuits", FEK Issue 784/B/12-9-1995.
4. MTC Decision 44 - "Establishment of the National Telecommunications Commission (EET)", FEK Issue 29/B/19-1-1995.



5. MTC Decision 69452 - "Internal Regulation of EET", FEK Issue 505/B/7-6-1995.
6. MTC Decision 68142 - "Regulation on Hearings", FEK Issue 527/B/16-6-1995.
7. MTC Decision 68141 - " Ethics Code for the Exercise of Telecommunications Activities", FEK Issue 581/B/4-7-1995.
8. MTC Decision 92093 - "Granting-Assignment of Frequencies and Determination of OTE Individual Licence Fees", FEK Issue 1101/B/29-12-1995.
9. MTC Decision 51477 - "Regulation on the Certification of Telecommunications Terminal Equipment", FEK Issue 48/B/19-1-1996.
10. MTC Decision 71 - "General Terms of Licences for the Exercise of Telecommunications Activities", FEK Issue 84/B/1-2-1997.
11. MTC Decision 52499 - "Determination of Revenue Fees Imposed on Telecommunications Enterprises", FEK Issue 84/B/1-2-1997.
12. MTC Decision 61646 - "Regulation on the Determination of Radio Frequency Spectrum and Geostationary Orbit Usage Fees, and of the Contributions for their Protection and Control", FEK Issue 505/B/26-5-1998.
13. MTC Decision 61647 - "Regulation on the Conditions and Procedures for Granting, Renewal, Suspension and Revocation of Licences regarding the Provision of Satellite Services", FEK Issue 505/B/26-5-1998.
14. MTC Decision 62087 - "Regulation on the Granting, Modification, Renewal, Suspension and Revocation of Frequency Assignments", FEK Issue 520/B/1-6-1998.
15. MTC Decision 76994 - "Regulation on the Conditions and Procedures for Granting, Renewal, Suspension and Revocation of Licences for Installation and/or Operation and/or Exploitation of Telecommunications Networks used for the Provision of Telecommunications Services to the Public", FEK Issue 1290/B/28-12-1998.
16. MTC Decision 50920/A/281 - "Regulation on the Provision of Personal Satellite Communications Services", FEK Issue 46/B/27-1-1999.
17. MTC Decision 59 - "Appointment of members and vice-chairmen in the National Telecommunications and Post Commission", FEK Issue 92/B/10-2-1999.
18. MTC Decision 57810 - "Determination of supporting documents required for submission, acceptance-modification-renewal and revocation of the Statement for the provision of postal services under a General Authorisation status", FEK Issue 437/B/23-4-1999.
19. MTC Decision 78794 - "Regulation on the Procedure for Issuance and Modification of General Authorisations, for Submission, Modification and Renewal of Statements of Registration and for depriving the right to use a General Authorisation ", FEK Issue 2112/B/3-12-1999.
20. MTC Decision 78574 - "Regulation on the Criteria and Procedure for Granting, Renewal, Modification, Suspension and Revocation of Individual Licences", FEK Issue 2117/B/6-12-1999.
21. MTC Decision 644 - "Delegation of authority for issuing Antenna Mast Licences", FEK Issue 39/B/20-1-2000.
22. Decision 26246/752 - "Determination of the type and procedure of investigations or other auditing acts to which EETT may have recourse for the establishment of violations of Law 2668/19987, of the procedure of Hearings etc.", FEK Issue 683/B/2-6-2000.
23. Decision 29030/816 - "Determination of cases in which a lump-sum compensation is imposed for deficient provision of postal services", FEK Issue 683/B/2-6-2000.
24. MTC Decision 29392 - "Amendment of the Regulation on the Criteria and procedure for Granting, Renewal, Modification, Suspension and Revocation of Individual Licences", FEK



- Issue 654/B/22-5-2000.
25. MTC Decision 25961/ 738 - "Determination of the criteria and procedure for Granting, Renewal, Modification, Suspension and Revocation of Individual Licences for the provision of postal services coming under the Universal Postal Service", FEK Issue 671/B/30-5-2000. Errata. "Errata in the Ministerial Decision 25961/738/17-07-2000", FEK Issue 873/B/17-7-2000.
 26. Decision 58648/4946 of the Deputy Minister of Transportation and Communications - "Granting of additional GSM 900/ DCS1800 Mobile Telephony Licences", FEK Issue 1280/B/20-10-2000.
 27. Ministerial Decision 79293/2000 - "Determination of the quality specifications and terms for the provision of the Universal Postal Service", FEK Issue 1588/B/29-12-2000.
 28. Ministerial Decision 53828/1420 - "Amendment to Decision 57810/21-4-1999 on the 'Determination of supporting documents for submission, acceptance etc. of postal services under General Authorisation status' ", FEK Issue 1580/B/28-12-2000.
 29. Decision 515/2001 of the Deputy Minister of Transportation and Communications - "Determination of public consultation procedure for granting Individual Licences under conditions limiting their number", FEK Issue 177/B/21-2-2001.
 30. Decision 26997/1737/2001 of the Deputy Minister of Transportation and Communications - "Limitation of the Number and procedure for granting additional Individual Licences for the provision of 2G (GSM/DCS) mobile services", FEK Issue 549/B/11-5-2001.
 31. Decision 26998/1738/2001 of the Deputy Minister of Transportation and Communications - "Limitation of the Number and procedure for granting additional Individual Licences for the provision of 3G (UMTS) mobile services", FEK Issue 549/B/11-5-2001.
 32. Joint Ministerial Decision 78870/14-12-2001 of the Ministers of Finance and of Transportation and Communications - "Regulation on the Establishment of Procurement, Services and Study Contracts of EETT", FEK Issue 1750/B/31-12-2001.
 33. Ministerial Decision 44465/2002 "Definition of legal form, minimum capital and minimum mandatory staffing of telecommunications companies", FEK Issue 7/B/11-01-2002.

EETT Regulatory Decisions pursuant to Law 2867/2000

1. EETT Decision 203/4/2001 - "OTE 2001 Reference Interconnection Offer", FEK Issue 138/B/12-2-2001.
2. EETT Decision 205/6/2001 - "EETT Recommendation regarding the public consultation process for granting Individual Licences under conditions limiting their number".
3. EETT Decision 206/2/2001 - "National Numbering Plan for Telephony Services and for Mobile and Personal Communications Services", FEK Issue 127/B/8-2-2001.
4. EETT Decision 207/2/2001 - "Regulation on Individual Licences", FEK Issue 195/B/1-3-2001.
5. EETT Decision 207/3/2001 - "Regulation on General Authorisations", FEK Issue 195/B/1-3-2001.
6. EETT Decision 218/38/2001 - "Amendment of EETT Decisions 207/2 of 2 February 2001 ('Regulation on Individual Licences') and 207/3 of 2 February 2001 ('Regulation on General Authorisations')".
7. EETT Decision 207/6/2001 - "Regulation on the Management and Allocation of Numbers under the National Numbering Plan for Telephony Services and for Mobile and Personal Communications Services", FEK Issue 159/B/16-2-2001.
8. EETT Decision 208/1/2001 - "Regulation on the Determination of the Time of Application



- of the Tariffs of Telecommunications Operators”, FEK Issue 193/B/28-2-2001.
9. EETT Decision 210/2/2001 - “Regulation on the Assignment of Individual Radio Frequencies or Radio Frequency Bands, under Individual Licence status, for provision of Public Telecommunication Services”, FEK Issue 285/B/19-3-2001.
 10. EETT Decision 210/3/2001 - “Regulation on the Determination of Spectrum Usage Fees and Radio Frequency Assignment Fees”, FEK Issue 351/B/30-3-2001.
 11. EETT Decision 211/3/2001 - “Regulation on Costing and Pricing Principles”, FEK 466/B/20-4-2001.
 12. EETT Decision 215/31/2001 - “Regulation on the Management of Short Codes under the National Numbering Plan for Telephony Services and for Mobile and Personal Communications Services”, FEK 644/B/28-5-2001.
 13. EETT Decision 217/29/2001 - “Reference Offer for Unbundled Access to the Local Loop of the Greek Telecommunications Organisation S.A. (OTE), Part I: Fully Unbundled Access”, FEK Issue 751/B/15-6-2001.
 14. EETT Decision 218/36/2001 - “Regulation on the Procedures, Terms and Conditions for conclusion of National Roaming contracts between Operators holding Individual Licences for Installation, Operation or Exploitation of 2G and/or 3G Mobile Public Telecommunication Networks”, FEK Issue 735/B/13-6-2001.
 15. EETT Decision 220/10/2001 of 21 June 2001 - “Regulation on the Determination of Operating Fees for Private Mobile Radio (PMR) Networks ”, FEK Issue 939/B/29-7-2001.
 16. EETT Decision 227/86/2001 - “Antenna Mast Construction not requiring a Licence, pursuant to article 1 of Law 2801/2000”, FEK Issue 1226/B/20-9-2001.
 17. EETT Decision 228/23 of 6 September 2001 - “Amendment of EETT Decision 217/29/18-5-2001 concerning the Reference Offer for Fully Unbundled Access to the Local Loop of the Greek Telecommunications Organisation S.A. (OTE) - FEK Issue 751/B/2001”, FEK Issue 1261/B/28-9-2001.
 18. EETT Decision 233/34/2001 of 22 October 2001 - “Determination of the Basic Level for Itemized Billing of Users of Fixed Public Telephony Networks and/or Integrated Services Digital Networks (ISDN networks) and/or Fixed Public Telephony Services, including Value Added Services, and of the parties under obligation to provide such Billing”, FEK Issue 1501/B/8-11-2001.
 19. EETT Decision 236/79/2001 - “Regulation on Licences for Land-based Antenna Mast Constructions”, FEK Issue 1649/B/11-12-2001.
 20. EETT Decision 238/95/2001 - “Reference Offer for Unbundled Access to the Local Loop of the Greek Telecommunications Organisation S.A. (OTE) - Part II: Shared Access to the Local Loop”, FEK Issue 1781/B/31-12-2001.
 21. EETT Decision 238/96/2001 - “Assignment of Radio Frequencies for Point-to-Point Links used, prior to the issuance of Ministerial Decision 62087/1998, by Public Telecommunications Service Providers”, FEK Issue 1773/B/31-12-2001.
 22. EETT Decision 239/69/2001 - “Amendment of Ministerial Decision 4829 GY/1992 ‘Granting of an Operating Licence for a GSM Cellular Telecommunications Network to ‘STET HELLAS - Telecommunications S.A.’ (FEK Issue 586/B/1992)”, FEK Issue 142/B/12-02-2002.
 23. EETT Decision 240/1/28-12-2001 - “Amendment of PD 437/1995 ‘Issue of Individual Licence for Installation, Development, Operation and Exploitation of Telecommunications Networks and for the



- Exercise of other Telecommunications Activities by the Greek Telecommunications Organisation S.A. (OTE) (FEK Issue 250/A/1995), to the extent concerning the Individual Licence for Provision of Personal Communications Services through the Personal Communications Network based on DCS Technology, which was transferred to the Société Anonyme under the business name 'COSMOTE - Mobile Communications S.A.', by article 15 of Law 2465/1997", FEK Issue 142/B/12-02-2002.
24. EETT Decision 240/5/2002 - "Dates for Commencement of the Third Stage in the Introduction of the National Numbering Plan", FEK Issue 25/B/16-01-2002.
 25. EETT Decision 240/13/2001 - "Designation of Parties under Obligation to provide Universal Service", FEK Issue 23/B/16-01-2002.
 26. EETT Decision 244/124/2002 of 1 February 2002 - "Regulatory Provisions on Universal Service", FEK Issue 188/B/20-02-2002.
 27. EETT Decision 247/63/2002 - "Provisional Interconnection Charges for Termination of Calls to the OTE Network for 2002", FEK Issue 319/B/19-03-2002.
 28. EETT Decision 248/57/2002 - "Amendment of EETT Decision 215/31/02-05-2001 ('Regulation on the Management of Short Codes under the National Numbering Plan for Telephony Services and for Mobile and Personal Communications Services)", FEK Issue 458/B/15-04-2002.
 29. EETT Decision 248/64/2002 - "Amendment of EETT Decision 229/26/14-03-2001 ('Amendment of PD 437/1995 'Issue of Individual Licence for Installation, Development, Operation and Exploitation of Telecommunications Networks and for the Exercise of other Telecommunications Activities by the Greek Telecommunications Organisation S.A. [OTE]')", FEK Issue 500/B/24-04-2002.
 30. EETT Decision 248/68/2002 - "Designation of SMP Operators in the Market for Public Mobile Telephony Networks and Public Mobile Telephony Services", FEK Issue 382/B/29-03-2002.
 31. EETT Decision 248/71/2002 - "Regulation on the Provision of Electronic Signature Certification Services", FEK Issue 603/B/16-05-2002.
 32. EETT Decision 249/115/2002 - "Regulation on Hearings concerning Telecommunications Issues", FEK Issue 642/B/23-05-2002.
 33. EETT Decision 250/87/2002 - "Granting of authorisation to the President of the EETT with regard to the adoption of measures in the framework of Radio Spectrum Monitoring and Control", FEK Issue 596/B/15-05-2002.
 34. EETT Decision 251/77/2002 - Designation of SMP Operators in the Market for the Provision of Leased Lines", FEK Issue 527/B/29-04-2002.
 35. EETT Decision 253/87/2002 - "Prices for Fully Unbundled and Shared Access to the Local Loop", FEK Issue 720/B/13-06-2002.
 36. EETT Decision 253/88/2002 - "Regulation of issues concerning Payment of Operating Fees for Private Mobile Radio (PMR) Networks", FEK Issue 709/B/11-06-2002.
 37. EETT Decision 254/70/2002 - "Regulation on the Introduction of Carrier Pre-selection in the Greek Market", FEK Issue 773/B/21-06-2002.
 38. EETT Decision 254/71/2002 - "Regulation on the Introduction of Number Portability in the Greek Market", FEK Issue 791/B/26-06-2002.
 39. EETT Decision 254/72/2002 - "Regulation on the Assignment of Individual Radio Frequencies for Private Wireless Links", FEK Issue 895/B/16-07-2002.
 40. EETT Decision 255/83/2002 - "Regulation on the Definition of the Universal Service Content", FEK Issue 874/ B/12-07-2002.
 41. EETT Decision 255/84/2002 - "Regulation of issues related to the Provision of Leased Lines", FEK Issue 810/B/28-06-2002.
 42. EETT Decision 261/142/2002 - "Reference Interconnection Offer for 2002 (RIO 2002) of



- the Greek Telecommunications Organisation S.A.", FEK Issue 1199/B/16-09-2002.
43. EETT Decision 261/143/2002 - "Regulation on Universal Service Costing and Pricing Principles", FEK Issue 1208/B/18-09-2002.
 44. EETT Decision 262/107/2002 - "Special measures for protecting Monitoring Stations of the National Radio Spectrum Management and Monitoring System against harmful interference", FEK Issue 1262/B/26-09-2002.
 45. EETT Decision 264/140/2002 - Designation of Parties under Obligation to provide Universal Service", FEK Issue 789/B/24-10-2002.
 46. EETT Decision 265/122/2002 - "Determination of the use of numbers of the '696' series under the National Numbering Plan", FEK Issue 1440/B/15-11-2002.
 47. EETT Decision 266/92/2002 - " Regulations concerning Short Codes under the National Numbering Plan", FEK Issue 1440/B/15-11-2002.
 48. EETT Decision 266/93/2002 - "Regulation on the Determination of Spectrum Usage Fees and of Radio Frequency Assignment Fees for Private Use, and Regulation of Issues regarding Payment of Radio Spectrum Usage Fees", FEK Issue 1458/B/15-11-2002.
 49. EETT Decision 266/96/2002 - "Publication of an EETT Certificate regarding OTE's Compliance with the Costing System approved by EETT for the Voice Telephony Services provided", FEK Issue 1440/B/15-11-2002.
 50. EETT Decision 267/100/2002 - "Determination of Short Code in connection with the Universal Service Obligation deriving from article 6. paragraph 8 of EETT Decision 255/83/14-06-2002 ('Determination of Universal Service Content')", FEK Issue 1518/B/04-12-2002.
 51. EETT Decision 267/123/2002 - "Publication of an EETT Certificate regarding OTE's Compliance with the EETT-approved Costing System for the Interconnection Services provided - Adoption and Publication in the Government Gazette", FEK Issue 1531/B/09-12-2002.
 52. EETT Decision 268/77/2002 - "Introduction of Part Circuits in the Greek Market", FEK Issue 1604/B/30-12-2002.
 53. EETT Decision 269/66/2002 - "Approval of Attachment to OTE's Reference Interconnection Offer for 2002 (2002 RIO) regarding Provision of Carrier Pre-selection", FEK Issue 1616/B/30-12-2002.
 54. EETT Decision 269/73/2002 - "OTE Offer for Provision of Pre-agreed SLA Leased Line Services", FEK Issue 17/B/14-01-2003.



Appendix II

European Union Regulatory Framework for the Telecommunications Sector

(as in force on 31 December 2002)

1. Council Directive 1987/372/EEC of 25 June 1987 on the frequency bands to be reserved for the coordinated introduction of public pan-European cellular digital land-based mobile communications in the Community.
2. Commission Directive 1988/301/EEC of 16 May 1988 on competition in the markets in telecommunications terminal equipment.
3. Council Directive 1990/387/EEC of 28 June 1990 on the establishment of the internal market for telecommunications services through the implementation of open network provision (ONP).
4. Commission Directive 1990/388/EEC of 28 June 1990 on competition in the markets for telecommunications services.
5. Council Directive 1991/263/EEC of 29 April 1991 on the approximation of the laws of the Member States concerning telecommunications Terminal Equipment, including the mutual recognition of their conformity.
6. Council Directive 1993/68/EEC of 2 July 1993 amending Directives 1987/404/EEC, 1988/378/EEC, 1989/106/EEC, 1989/336/EEC, 1989/392/EEC, 1989/686/EEC, 1990/384/EEC, 1990/385/EEC, 1990/396/EEC, 1991/263/EEC, 1992/42/EEC, 1973/23/EEC.
7. Council Directive 1993/97/EEC of 29 October 1993 supplementing Directive 1991/263/EEC in respect of satellite earth station equipment.
8. Commission Directive 1994/46/EC of 13 October 1994 amending Directive 1988/301/EEC and Directive 1990/388/EEC in particular with regard to satellite communications.
9. Commission Directive 1995/51/EC of 18 October 1995 amending Directive 1990/388/EEC with regard to the abolition of the restrictions on the use of cable television networks for the provision of already liberalised telecommunications services.
10. Directive 1995/62/EC of the European Parliament and of the Council of 13 December 1995 on the application of Open Network Provision (ONP) to voice telephony.
11. Commission Directive 1996/2/EC of 16 January 1996 amending Directive 1990/388/EEC with regard to mobile and personal communications.
12. Commission Directive 1996/19/EC of 13 March 1996 amending Directive 1990/388/EEC with regard to the implementation of full competition in telecommunications markets.
13. Directive 1997/13/EC of the European Parliament and of the Council of 10 April 1997 on a common framework for General Authorizations and Individual licences in the field of telecommunications services.
14. Directive 1997/33/EC of the European Parliament and of the Council of 30 June 1997 on interconnection in Telecommunications with regard to ensuring Universal Service and interoperability through application of the principles of Open Network Provision (ONP).
15. Directive 1997/51/EC of the European Parliament and of the Council of 6 October 1997 amending Council Directives 1990/387/EEC and 1992/44/EEC for the purpose of adaptation to a competitive environment in telecommunications.
16. Directive 1997/67/EC of the European Parliament and of the Council of 15 December 1997 on common rules for the development of the internal market of Community postal services and the improvement of quality of service.



17. Directive 1998/10/EC of the European Parliament and of the Council of 26 February 1998 on the application of Open Network Provision (ONP) to Voice Telephony and on Universal Service for telecommunications in a competitive environment.
18. Directive 1998/13/EC of the European Parliament and of the Council of 12 February 1998 relating to telecommunications terminal equipment and satellite earth station equipment, including the mutual recognition of their conformity.
19. Commission Decision of 18 June 1997 concerning the granting of additional implementation periods to Greece for the implementation of Directive 1990/388/EEC as regards full competition in the telecommunications markets.
20. Directive 1998/84/EC of the European Parliament and of the Council of 20 November 1998 on the legal protection of services based on, or consisting of, conditional access.
21. Directive 1998/61/EC of the European Parliament and of the Council of 24 September 1998 amending Directive 1997/33/EC with regard to operator Number Portability and Carrier Pre-selection.
22. Directive 1999/5/EC of the European Parliament and of the Council of 9 March 1999 on Radio Equipment and Telecommunications Terminal Equipment and the mutual recognition of their conformity.
23. Commission Directive 1999/64/EC of 23 June 1999 Amending Directive 1990/388/EEC in order to ensure that telecommunications networks and cable TV networks owned by a single operator are separate legal entities.
24. Regulation 2887/2000/EC of the European Parliament and of the Council of 18 December 2000 on Unbundled Access to the Local Loop.
25. Directive 2002/21/EC of the European Parliament and of the Council of 7 March 2002 on a common regulatory framework for electronic communications networks and services (Framework Directive), OJ L 108, 24/04/2002, p. 0033-0050.
26. Directive 2002/20/EC of the European Parliament and of the Council of 7 March 2002 on the authorisation of electronic communications networks and services (Authorisation Directive), OJ L 108, 24/04/2002, p. 0021-0032.
27. Directive 2002/19/EC of the European Parliament and of the Council of 7 March 2002 on access to, and interconnection of, electronic communications networks and associated facilities (Access Directive), OJ L 108, 24/04/2002, p. 0007-0020.
28. Directive 2002/22/EC of the European Parliament and of the Council of 7 March 2002 on Universal Service and users' rights relating to electronic communications networks and services (Universal Service Directive), OJ L 108, 24/04/2002 P. 0051 - 0077.
29. Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications), OJ L 201, 31/07/2002, p. 0037-0047.
30. Commission Directive 2002/77/EC of 16 September 2002 on competition in the markets for electronic communications networks and services, OJ L 249, 17/09/2002, p. 0021-0026.
31. Decision No 676/2002/EC of the European Parliament and of the Council of 7 March 2002 on a regulatory framework for radio spectrum policy in the European Community (Radio Spectrum Decision), OJ L 108, 24/04/2002, p. 0001-0006.
32. Decision 2002/627/EC of 29 July 2002 establishing the European Regulators Group for electronic communications networks and services, OJ L 200, 30/07/2002, p. 0038-0040.



Appendix III

List of Undertakings Licensed to provide Telecommunications Services

(as in force on 31 December 2002)

A. INDIVIDUAL LICENCES					
INSTALLATION & OPERATION & EXPLOITATION OF FIXED NETWORK AND PROVISION OF VOICE TELEPHONY					
No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
1	COSMOTE S.A.	44 KIFISSIAS AVE.	MAROUSSI	151 25	210 617 7777/210 617 7384
2	DEH TELECOMMUNICATIONS S.A.	89 DIRRACHIOU ST. & KIFISSOU ST.	ATHENS	104 43	210 522 0016 / 210 523 2733
3	EUROPROM TELECOMMUNICATIONS S.A.	209 KIFISSIAS AVE.	MAROUSSI	151 24	210 614 1106 / 210 809 7620
4	FORTHNET S.A.	4 ATTHIDON ST.	KALLITHEA	176 71	210 955 9000 / 210 955 9444
5	GRAPES HELLAS S.A.	12 ZISSIMOPOULOU ST.	ATHENS	115 24	210 698 7200 / 210 698 7105
6	INFO QUEST S.A.	2A ARGIROUPOLEOS ST.	KALLITHEA	176 76	210 950 4672/ 210 950 4530
7	INTRACONNECT S.A.	5 KLISSOURAS ST. & TATOIOU AVE.	METAMORFOSSI	144 52	210 285 5830 / 210 285 5839
8	LAN-NET S.A.	6 CHIMARAS ST.	MAROUSSI	151 25	210 616 7000 / 210 616 7100
9	MEDITERRANEAN BROADBAND ACCESS S.A.	4 ATTHIDON ST.	KALLITHEA	176 71	210 955 9050 / 210 955 9055
10	OTE	99 KIFISSIAS AVE.	MAROUSSI	151 25	210 611 5011 / 210 611 7456
11	TELLAS S.A. TELECOMMUNICATIONS	1A & 3 NEAPOLEOS ST.	MAROUSSI	151 23	210 811 3411/210 811 3459
12	VIVODI TELECOMMUNICATIONS S.A.	29-31 DERIGNY ST. & 18 ELPIDOS ST.	ATHENS	104 34	210 889 3700 / 210 889 3701
13	VODAFONE PANAFON	44 KIFISSIAS AVE.	MAROUSSI	151 25	210 616 0000 / 210 616 0001

INSTALLATION & OPERATION & EXPLOITATION OF FIXED NETWORK					
No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
1	ATTICA TELECOMMUNICATIONS	18 FILELLINON ST.	CHALANDRI	152 32	210 687 3800 / 210 685 2490
2	CONVERGENCE VENTURES LIMITED	500 VOULIAGMENIS AVE.	ALIMOS	174 56	210 995 9931 / 210 995 9853
3	MEDITERRANEAN NAUTILUS GREECE S.A.	SOKRATOUS ST. & 2 KIPROU ST.	MELISSIA	151 27	210 810 2633 / 210 803 0555
4	TYCOM NETWORKS S.A.	67 PENTELIS AVE.	MAROUSSI	151 26	210 612 7000 / 210 612 2087
5	VODAFONE PANAFON	44 KIFISSIAS AVE.	MAROUSSI	151 25	210 616 0000 / 210 616 0001



PROVISION OF VOICE TELEPHONY SERVICES					
No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
1	ACN S.A.	14 PATMOU ST.	MAROUSSI	151 23	210 687 2900 / 210 687 2901
2	ALGONET S.A.	206 SINGROU AVE.	N. SMIRNI	171 21	210 931 0282 / 210 935 2873
3	COSMOLINE	47 AG. KONSTANTINOU ST.	MAROUSSI	151 24	210 812 6000 / 210 812 6100
4	ECONOPHONE HELLAS S.A.	41 ATHINAS AVE.	VOULIAGMENI	166 71	210 967 0733 / 210 967 0442
5	HELLENIC TELECOMMUNICATIONS S.A.	31 AKADIMIAS ST.	ATHENS	106 72	210 338 3500 / 210 338 5510
6	IDEAL TELECOM S.A.	190 SINGROU AVE.	KALLITHEA	176 71	210 955 1800 / 210 957 2837
7	NET ONE S.A.	2 PERIKLEOUS ST.	N.PSICHIKO	154 51	210 678 1300 / 210 678 1390
8	STARCOM S.A.	12 FORMIONOS ST.	ATHENS	116 34	210 729 2980 / 210 729 7757
9	TELEDOME S.A.	10 FILARETOU ST. & DOIRANIS ST.	KALLITHEA	176 72	210 956 9277 / 210 956 3882
10	TELEPASSPORT (HELLAS) S.A.	81 PATION ST. & 8 HEYDEN ST.	ATHENS	104 03	210 820 9000 / 210 820 9009
11	VOICENET	5 PROFITI ILIA SQ.	PANGRATI	116 35	210 757 3100 / 210 757 3111

INSTALLATION, OPERATION AND EXPLOITATION OF 2G MOBILE NETWORKS AND PROVISION OF 2G SERVICES					
No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
1	COSMOTE S.A.	44 KIFISSIAS AVE.	MAROUSSI	151 25	210 617 7795 / 210 617 7384
2	INFO QUEST S.A.	25 AL. PANTOU ST.	KALLITHEA	176 71	210 929 9400 / 210 929 9499
3	STET HELLAS S.A.	66 KIFISSIAS AVE.	MAROUSSI	151 25	210 615 8000 / 210 610 9957
4	VODAFONE-PANAFON	44 KIFISSIAS AVE.	MAROUSSI	151 25	210 616 0000 / 210 616 0001

INSTALLATION, OPERATION AND EXPLOITATION OF 3G MOBILE NETWORKS AND PROVISION OF 3G SERVICES					
No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
1	COSMOTE S.A.	44 KIFISSIAS AVE.	MAROUSSI	151 25	210 617 7795 / 210 617 7384
2	STET HELLAS S.A.	66 KIFISSIAS AVE.	MAROUSSI	151 25	210 615 8000 / 210 610 9957
3	VODAFONE-PANAFON	44 KIFISSIAS AVE.	MAROUSSI	151 25	210 616 0000 / 210 616 0001



INSTALLATION, OPERATION AND EXPLOITATION OF SATELLITE NETWORKS AND PROVISION OF SATELLITE COMMUNICATIONS SERVICES					
No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
1	ALPHA DIGITAL SYNTHESIS S.A. (A.D.S)	201 PIREOS ST.	ATHENS	118 53	210 489 7459 / 210 489 7411
2	ANTENNA SATELLITE S.A.	10-12 KIFISSIAS AVE.	MAROUSSI	151 25	210 688 6400 / 210 689 2113
3	COM-TO-NET S.A.	13 EGIDON ST. & SENEKA ST.	N. KIFISSIA	145 64	210 624 9600 / 210 625 3761
4	CONVERGENCE VENTURE LIMITED	500 VOULIAGMENIS AVE.	ALIMOS	174 56	210 995 9931 / 210 995 9853
5	FORTHNET S.A.	4 ATTHIDON ST.	KALLITHEA	176 71	210 955 9000 / 210 955 9444
6	INTELCO S.A.	11 THERMOPILON ST. & MAKEDONIAS ST.	CHALANDRI	152 33	210 689 4610 / 210 689 4608
7	KB IMPULS HELLAS S.A.	109 AMFITHEAS AVE.	P. FALIRO	175 63	210 988 1430 / 210 985 4736
8	OTE	99 KIFISSIAS AVE.	MAROUSSI	151 25	210 611 5011 / 210 611 7456
9	SYNED	MANIS ST.	KANTZA	151 23	210 660 2212 / 210 604 0611
10	TELESPAZIO S.P.A.	VIA TIBURTINA 965	ROMA	00 156	+39 06 40791/ +39 06 4079372
11	UNITEL HELLAS S.A.	151 SEVASTOUPOLEOS ST.	ATHENS	115 26	210 950 4780 / 210 950 4781

PROVISION OF WIRELESS LOCAL AREA NETWORK (W-LAN) SERVICES					
No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
1	COSMOTE S.A	44 KIFISSIAS AVE.	MAROUSSI	151 25	210 617 7777 / 210 617 7384
2	OTENET S.A.	56 KIFISSIAS AVE. & DELFON ST.	MAROUSSI	151 25	210 615 1600 / 210 615 1700

INSTALLATION, OPERATION AND EXPLOITATION OF TETRA NETWORKS AND PROVISION OF TETRA SERVICES					
No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
1	OTE	99 KIFISSIAS AVE.	MAROUSSI	151 25	210 611 1000 / 210 611 7456



B. GENERAL AUTHORISATIONS

No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORISATION
1	ABC TELECOM HELLAS S.A.	8 MARINOY ANTIPA ST.	PILEA	570 01	231 047 6620, 231 047 6608/ 231 047 6613	A1102
2	ACIS GROUP	7 KARATASSOU ST.	THESSALONIKI	546 26	231 054 2605/ 231 054 2614	A0701, A0401
3	ACN S.A.	14 PATMOY ST.	MAROUSSI	151 23	210 687 2900/ 210 687 2901	A0202, A0301, A0601, A0701, A1001, A1102, A1002, A0101, A0201, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0602, A0603, A0604, A0605, A0606, A0607, A0801, A0802, A0803, A0901, A1101, A1202, B0103, C0101, C0201, C0202, C0203, C0204, C0205, C0302, C0303, C0401, C0402, C0403
4	ALFA ENGINEERING	7 KONSTANTINIDI ST.	NAOUSSA	592 00	229 602 6194/ 229 602 2528	A0701
5	ALFANET S.A.	9 ACHELOOY ST.	THESSALONIKI	546 27	231 050 0760/ 231 050 0767	A0301, A0401, A0602, A0701
6	ALFA TEL	70 AG. PANTELEIMONOS ST.	KERATSINI	187 55	210 462 6145/ 210 463 6894	A1102
7	ALGONET S.A.	206 SINGROY AVE.	KALLITHEA	176 72	210 955 8300, 210 931 0282/ 210 955 8301	A0201, A0202, A0301, A0403, A0601, A0701, A1001, A0101, A0401, A0501, A0502, A0503, A0603, A0604, A0605, A0606, A0607, A1002, A1101, A1102, A1103
8	ALPHA NETWORK S.A.	5 FRAGKOUDI ST.	KALLITHEA	176 71	210 9203700/ 210 9203799	A0401, A0701, A1102
9	ALPHALINE	19 MEANDROY ST.	ATHENS	115 28	210 728 800/ 210 728 0803	A1102
10	ALTA S.A.	17A LISSIKRATOY ST.	ATHENS	105 58	210 323 9034/ 210 323 2000	A0303, A0403, A0601, A1001, A0201
11	AMIMEX LTD	15-17 SARANTAPICHOU ST.	ATHENS	114 71	210 645 3376/ 210 645 3367	A0301, A0601, A1201, A0101, A0603, A0604, A1001, A1002, A1101, A1103, A0403, A0701
12	AN.ET.A. S.A.	1 DIMOKRATIAS AVE.	ALEXANDROUPOLI	681 00	255 108 8340/ 255 108 8342	A0301, A0701, A0101, A0201, A0401, A0501, A0604, A0605, A0901
13	ANTENNA INTERNET S.A.	10-12 KIFISSIAS AVE.	MAROUSSI	151 25	210 688 6727/ 210 688 6542	A0701
14	ANTENNA TV S.A.	10-12 KIFISSIAS AVE.	MAROUSSI	151 25	210 688 6100/ 210 689 0304	A0701
15	APOPSI S.A.	33 M. BOTSARI ST.	DRAPETSONA	186 48	210 462 9300/ 210 461 9565	A0701
16	ARGONET	35 XENOFONTOY ST.	VOLOS	383 33	242 107 6400/ 242 102 9049	A0401, A0701
17	A.S.D.A.	65 ETHNIKIS ANTISTASSEOY ST.	PERISTERI	121 34	210 574 5826/ 210 575 9547	A0701, A0401
18	ASTRA INTERNATIONAL S.A.	9 GUILFORDOY ST.	ATHENS	104 34	210 825 4200/ 210 823 4184	A1102
19	ATLAS NET	5 IVISKOY ST. & PEFKON ST.	AG. IEROTHEOY - PERISTERI	121 37	210 577 9969/ 210 578 6532	A0701
20	AT & T G.N.S. LTD	284 KIFISSIAS AVE.	CHALANDRI	152 32	210 685 6222/ 210 688 1562	A0301, A0402, A0604, A0201, A0202, A0302, A0403, A0501, A0503, A0601, A0602, A0603, A0605, A0606, A1002, A0401, A0407, A0701
21	AUCS HELLAS S.A.	38 KIFISSIAS AVE.	MAROUSSI	151 25	210 619 8872/ 210 619 8995	A0401, A0601, A0603, A0701, A0605, A0301, A0402, A0602, A0604



No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORISATION
22	AUDIOTEX S.A.	10-12 KIFISSIAS AVE.	MAROUSI	151 25	210 680 0840-3/ 210 680 0843	A1102
23	AURORA GLOBAL SOLUTIONS S.A.	48 ZEPOU ST.	GLIFADA	166 75	210 893 1000/ 210 893 1000	A0101, A0201, A0301, A0302, A0411, A0601, A0605, A0606, A0701, A0901, A1001
24	AXIOMA	3 THIATIRON ST.	N. SMIRNI	171 21	210 935 1512/ 210 935 3688	A0701, A1102
25	AXIOM NET S.A	4 PINIOU ST.	THESSALONIKI	562 24	231 076 1561/ 231 070 6795	A0101, A0201, A0401, A0701, A0901
26	AXIOM PLIROFORIKI	4 PINIOU ST.	EVOSMOS	562 24	231 076 1561/ 231 070 6795	A0701
27	BEE COMMUNICATION S.A.	19 PAELOGOUGO ST.	LARISSA	412 23	241 055 4045/ 241 055 0333	A0604, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411
28	BELGACOM	BOULEVARD DU ROI ALBERT II 27	BRUSSELS - BELGIUM	1030	+32 220 28337	A0201, A0202, A0301, A0701, A1001
29	BEST DELIVCOM	47 FAVIEROU ST.	CHALKIDA	341 00	222 106 1170/ 222 106 1172	A0101, A0201, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701
30	BOLERO	3 THIATIRON ST.	N. SMIRNI	171 21	210 933 4986/ 210 935 3688	A1102
31	CABLE & WIRELESS COMMUNICATIONS	124 THEOBALDS ROAD	LONDON WC1X	8RX UK	+ 44(0) 207 315 4000 / +44(0) 207 315 5000	A0101, A0201, A0202, A0301, A0302, A0401, A0402, A0403, A0404, A0405, A0501, A0601, A0602, A0604, A0605, A0701
32	CALL CENTER	1 VILARA ST.	THESSALONIKI	546 25	231 055 5802, 231 055 5801/ 231 053 3412	A1102
33	CHIOS COMPULINK	31 EL. VENIZELOU ST.	CHIOS	821 00	227 108 8331/ 227 108 1332	A0701
34	CITISHOP A.E.E.	501 MESSOGION AVE.	AG. PARASKEVI	153 43	210 606 8213/ 210 600 2037	A0202, A0403, A0701, A0301, A0601, A1001
35	COMPULINK NETWORK S.A.	44 SINGROU AVE.	ATHENS	117 42	210 928 2700/ 210 924 9801	A0101, A0201, A0202, A0301, A0302, A0401, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0603, A0604, A0605, A0606, A0607, A0901, A1001, A1002, A1101, A1102, A1103, A1202, B0103, B0104, C0101, C0201, C0202, C0204, A0701
36	COMPUTER LAB - DIKTYO	8 PR. CHRISTOFOROU ST.	SERRES	621 00	232 102 0551/ 232 105 2185	A0701
37	COMPUTER SCIENCE	3 OCTOBER 28 th ST.	ARGOS	212 00	275 102 4141/ 275 102 2566	A0701
38	COM-TO NET S.A.	13 EGIDON ST. & SENEKA ST.	N. KIFISSIA	145 64	210 624 9600/ 210 625 3761	A0201, A0301, C0101, C0204, C0205, C0303, C0402, A0202, A0701
39	CONVERGENCE COMMUNICATIONS OF GREECE LTD	500 VOULIAGMENIS AVE.	ALIMOS	174 56	210 995 9931/ 210 995 9853	A0701
40	COSMOLINE S.A.	47 AG. KOSTANTINOY ST.	MAROUSI	151 24	210 812 6000/ 210 812 6100	A0601, A0701, A1001, A1002, A1202, C0204, A0301, A0604
41	COSMOS COMPUTERS S.A.	73 VRILISSOU ST.	ATHENS	114 76	210 649 2800/ 210 646 4069	A0101, A0201, A0401, A0501, A0603, A0604, A0605, A0701
42	COSMOTE S.A.	44 KIFISSIAS AVE.	MAROUSI	151 25	210 617 7795/ 210 617 7384	A0301, A0701, A1102, A0601, A0604, A0202, A0401, A1001
43	DALLAS INFORMATION SYSTEMS	11 BAKAGIANNI ST.	IGOUMENITSA	461 00	266 502 3674/ 266 502 2317	A0701
44	DATABANK	64B KIFISSIAS AVE.	MAROUSI	151 25	210 6155 200/ 210 615 5222	A0604, A1102



No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORISATION
45	DATAWAYS HELLAS S.A.	85 NOVEMBER 17 th ST.	THESSALONIKI	543 52	231 095 3953/ 231 095 3963	A0701
46	DEFENDER GROUP S.A.	30 SINGROU ST.	THESSALONIKI	546 30	231 054 1901/ 231 053 7065	A0701, A0401
47	DETECARD SERVICE	130 ALLERSBERGER STR.	NÜREMBER GERMANY	904 61	+49 9114303 3900/ +49 9114303 2009	A1001
48	DEPA S.A.	207 MESSOGION AVE.	ATHENS	115 25	210 679 3500/ 210 674 9504	A0101, A0201, A0301, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0801, A0802, A0803, A0901, A1001, A1002, A1101, A1102, A1201
49	DIAVLOS PLIROFORIKI	15 E. SOFOULI ST.	SAMOS	831 00	227 302 8521/ 231 045 6376	A0701
50	DIMOSTHENIADIS PUBLICATIONS ONE-PERSON LTD	16 FERRON ST.	ATHENS	104 34	210 884 1470/ 210 884 1838	A1102
51	DIONI S.A.	31 AKADIMIAS ST.	ATHENS	106 72	210 338 3500/ 210 338 3510	A0301, A0303, A0403, A0701, A0302
52	DODO NET LTD	SKALA PATMOU	PATMOS	855 00	224 703 3019/ 224 703 4041	A0701, A0401
53	DOMI INFORMATION TECHNOLOGY S.A.	55 DODEKANISSOU ST.	PIREAS	185 40	210 422 4959, 210 965 6434/ 210 413 7123	A0401, A0701
54	ECONOPHONE HELLAS S.A.	41 ATHINAS AVE.	VOULIAGMENI	166 71	210 967 0733/ 210 967 0442	A0402, A0403, A0601, A0701, A1001, A0101, A0201, A0301, A0302, A0405, A0406, A0501, A0503, A0602, A0603, A0604, A0605, A0606, A0607, A0901, A1002, A1101, A1102, A1201, C0101, C0204, C0205, C0302, C0303, A0401
55	EDISINET S.A.	46 PATISSION ST.	ATHENS	108 62	210 822 0054/ 210 821 7663	A0101, A0201, A0301, A0401, A0603, A0605, A0607, A0701, A0901
56	E.E.X.I.	56-58 CH. TRIKOUPI ST.	ATHENS	106 80	210 363 3650/ 210 363 3107	A0701, A0401
57	ELEA LTD	50-52 VALTETSIU ST.	ATHENS	106 81	210 380 2335/ 210 380 6770	A0604, A0701
58	ENTELECHIA LTD	15 DITIKIS THRAKIS ST.	SERRES	621 24	232 105 7518/ 232 105 7519	A0701
59	"EL. VENIZELOS" ATHENS INTERNATIONAL AIRPORT S.A.	ATHENS INTERNATIONAL AIRPORT, ADMINISTRATION BUILDING	SPATA	190 19	210 353 6415/ 210 353 7782	A0202, A0701, A1001, A0301
60	ENTERNET	18 AMALIADOS ST.	ATHENS	115 24	210 647 0800/ 210 647 0803	A0701, A0401
61	EQUANT LTD	16 KIFISSIAS AVE.	MAROUSSI	151 25	210 688 2800/ 210 680 1561	A0604
62	EQUINOX D.R LTD	22 KANARI ST. & 34 DIMOSTHENOUS ST.	AG. PARASKEVI	153 43	210 601 5900/210 600 4400	A0701, A0401, A1001
63	E-SAT S.A.	109 AMFITHEAS AVE.	P. FALIRO	175 63	210 985 8126-9/ 210 985 3671	A0101, A0201, A0202, A0301, A0401, A0405, A0501, A0602, A0701, A0802, A0901, C0101, C0201, C0204, C0205, C0301, C0303, C0403
64	ETHNODATA S.A.	12 THESSALONIKIS ST.	MOSCHATO	183 46	210 480 6812/ 210 480 6815	A0701
65	E-TONE S.A.	10 ARKADIOU ST.	MAROUSSI	151 24	210 614 6405/ 210 614 6233	A0201, A0301, A0401, A0403, A0501, A0601, A0602, A0605, A0701, A0901, A1001, A1002, A1101, B0103, B0104, B0301
66	EURO-LINK TELECOMMUNICATIONS S.A.	9 V. FAVI ST.	PSICHIKO	115 25	210 672 7278/ 210 672 7578	A0301, A0601, A0701, A0501, A0502, A0604, A1001, A1002, A1101, A0401, A0101, A0201, A0302



No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORISATION
67	EUROPROM TELECOMMUNICATIONS S.A.	209 KIFISSIAS AVE.	MAROUSSI	151 24	210 614 1106/ 210 809 7620	A0101, A0201, A0301, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0801, A0802, A0803, A0901, A1001, A1002, A1101, A1102, A1201
68	EVRIPOS NET S.A.	4 ATHINAS ST.	CHALKIDA	341 00	222 108 4630/ 222 108 2698	A0701
69	EXONET S.A.	15-17 TSOCHA ST.	ATHENS	115 21	210 649 0000/210 646 5612	A0403, A0604, A0401, A0202, A0501, A0502, A0901, A1001, A1002, A0301, A0601, A0701
70	EXPRESSNET	91 GIANNITSON ST.	THESSALONIKI	546 27	231 053 7137/ 231 054 5358	A0701, A0401
71	EXTRA LINE LTD	7 DODEKANISSOU ST.	THESSALONIKI	546 26	231 059 0400/231 059 0405	A0401, A0901, A1102, A1103
72	FASTNET S.A.	6 PATROKLOU ST. & ANDROMACHIS ST.	MAROUSSI	151 25	210 682 9035/ 210 682 9036	A0701, A0401
73	FIRST GLOBAL TELEPHONE-INTERNET NETWORK	16 DIOMIDOUS KIRIAKOU ST.	KIFISSIA	145 62	210 808 9102/ 210 808 9103	A1002
74	FIRST TELECOM LTD	69 VATAZI ST.	ATHENS	114 73	210 644 1354/ 210 645 9787	A0101, A0201, A0301, A0302, A0303, A0401, A0403, A0410, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A1001, A1002, A1101, A1102, A1201
75	FLAG TELECOM HELLAS	5 LIVINI ST.	ATHENS	114 71	210 727 9066/ 210 727 9190	A0101, A0201, A0202, A0301, A0302, A0401, A0601, A0602, A0603, A0605, A0606, A0701
76	FONOTEL S.A.	55 TENEDOU ST.	ATHENS	113 61	210 866 5130/ 210 866 5130	A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A1001, A1002
77	FORTH-CRS	3 ARGIROUPOLEOS ST.	AGRIROUPOLI	164 51	210 955 9280/210 955 9289	A0202, A0301, A0302, A0401, A0602, A0603, A0604, A0605, A0701, A0901
78	FORTHE-COM	4 ATTHIDON ST.	KALLITHEA	176 71	210 955 9300/ 210 955 9333	A0401, A0901, A0301, A0404, A0402
79	FORTHLINK S.A.	129 STR. DAGLI ST.	ATHENS	111 45	210 854 2604/ 210 854 2604	A0701, A0401
80	FORTHNET S.A.	4 ATTHIDON ST.	KALLITHEA	176 71	210 955 9000/ 210 955 9444	A0601, A0701, A0202, A0301, A0302, A0401, A0402, A0403, A0602, A0603, A0604, A0605, A0901, A1002, A0201, A0303, A0404, A0405, A0501, A0502, A0503, A0606, A0607, A1001, A1101, A1102, A1103, A0101
81	FREE PHONE HELLAS	3 MIAOULI ST.	THESSALONIKI	546 42	231 081 3950/231 088 7922	A0301, A0403, A0601
82	GALILEO HELLAS S.A.	MISTRA ST. & 31 st ST.	ELLINIKO	167 77	210 893 1700/ 210 963 4566	A0101, A0201, A0202, A0301, A0401, A0601, A0603, A0605, A1001, A1002, A0403, A0402, A0404, A0604
83	GATEWAY TELECOMMUNICATIONS S.A.	362 KIFISSIAS AVE.	CHALANDRI	152 33	210 811 8100/ 210 684 8068	A0601, A0604
84	GIANNOPOULOS G. - VOUTSIS I. & CO E.E.	5 KEFALA ST.	KALAMATA	241 00	272 102 7931/ 272 109 5020	A0701
85	GLOBAL ONE HELLAS S.A.	62 KIFISSIAS AVE.	MAROUSSI	151 25	210 619 8951/ 210 619 8957	A0301, A0401, A0402, A0403, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701
86	GLOBAL TELELINK LTD (GTL)	5 VILARA ST.	ATHENS	104 37	210 520 2989	A0403, A1001, A0601



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87	4GM NEW MEDIA TECHNOLOGIES S.A.	8 G. PALAMA ST.	THESSALONIKI	546 22	231 026 0252/231 026 0252	A0401, A0701
88	GRAPES HELLAS S.A.	12 ZISSIMOPOULOU ST.	ATHENS	115 24	210 698 7200/210 698 7105	A0301, A0401, A0403, A0701, A0202, A0303, A0402, A0601, A1001
89	GRECIANNET	101 KISSAMOU ST.	CHANIA	731 31	282 109 7554/ 282 107 6263	A0701, A0401
90	GREVENA CHAMBER NET	5 E. PAPPAS ST.	GREVENA	511 00	246 202 5110, 246 202 5105/ 246 208 0310	A0701
91	GROOVY PRODUCTIONS	24 P. TSALDARI ST.	MELISSIA	151 27	210 613 4444/210 803 2562	A0701
92	GROUP 3 S.A.	37 P. GRIGORIOU E' ST.	THESSALONIKI	542 48	231 032 4440/ 231 030 8829	A0701
93	G.T. - GREEK TELECOM S.A.	31 AKADIMIAS ST.	ATHENS	106 72	210 338 3500/ 210 338 3510	A0101, A0601, A0604, A0701, A1001
94	HELLAS NET	4 ATTHIDON ST.	KALLITHEA	176 71	210 955 9500/ 210 955 9555	A0402, A0701, A0401, A0301, A0403
95	HELLAS ON LINE	151 CHARILAOU TRIKOUPI ST.	KIFISSIA	145 64	210 629 6201/ 210 629 2166	A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0502, A0503, A0201, A0202, A0301, A0501, A0802, A0803, A0901, A1001, A1002, A1101, A1103
96	HELLASFON NETWORKS S.A.	97 KANTANOU ST.	HERAKLIO CRETE	713 03	281 037 0370/ 281 026 2621	A0201, A0202, A0301, A0403, A0601, A0701, A1001
97	HIT S.A.	180 KIFISSIAS ST.	CHALANDRI	152 31	210 950 4780/ 210 950 4781	A0201, A0202, A0301, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0601, A0701, A1001
98	HUB	75 TATOIOU AVE.	KIFISSIA	145 64	210 620 0035/ 210 620 7331	A0401, A0701, A1002
99	HYPERNET LTD	57 ERMOU ST.	THESSALONIKI	546 23	231 027 9659/ 231 027 9858	A0701, A0401
100	HYPERTECH S.A.	125-127 KIFISSIAS AVE.	MAROUSSI	115 24	210 699 6072/ 210 699 5450	A0101, A0301, A0403, A0901, A0201, A0402, A0604, A0701
101	IDEAL ACROPOLIS	17 SAPFOUS ST.	KALLITHEA	176 76	210 957 2720/ 210 957 0111	A0701, A0401, A0604
102	IDEAL TELECOM S.A.	190 SINGROU AVE.	KALLITHEA	176 71	210 956 2551/ 210 957 9094	A0201, A0202, A0301, A0602, A0604, A0606, A1101, A1201, A0603, A0605, A1001, A1002, A1103, C0101, C0201, C0204, A0401, A0601, A0701
103	I.I.S. S.A.	72-74 SALAMINOS ST.	KALLITHEA	176 75	210 957 6695/ 210 957 0889	A0701, A0401
104	IKE-ATHINA	44 PANEPISTIMIOU ST.	ATHENS	106 79	210 338 7702, 210 364 5407/ 210 364 6392	A0401, A0701
105	INCREDIBLE NETWORKS	20 KAREA ST.	ATHENS	116 36	210 921 2312/ 210 921 0855	A0401, A0701
106	INET HELLAS LTD	88 SEPTEMBER 3 rd ST.	ATHENS	104 34	210 821 7460/ 210 822 9740	A0701, A0901, A1002
107	INFO QUEST S.A.	25-27 AL. PANTOU ST.	KALLITHEA	176 71	210 999 3000/ 210 999 3001	A0101, A0201, A0202, A0301, A0302, A0401, A0402, A0403, A0411, A0501, A0502, A0503, A0601, A0603, A0604, A0605, A0606, A0607, A0701, A0901, A1001, A1002, A1101, A1103, A1201, B0101, B0102, B0103, B0104, B0201, B0301, B0401, B0501, C0203
108	INFOGROW LTD	17 M. BOTSARI ST.	LIKOVRISSI	141 23	210 283 4845/ 210 283 4863	A0701



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109	INTELCO	11 THERMOPILOON ST. & MAKEDONIAS ST.	CHALANDRI	152 33	210 689 4610/ 210 689 4608	A0403, A0405, A0408, A0410, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A401 A0402, A0404, A0406, A0407, A0409, A0411
110	INTERCONNECT LTD	10-16 MINOOS ST.	N. KOSMOS	117 43	210 929 6741/ 210 929 6741	A0701, A1002
111	INTERNET HELLAS S.A.	92 AMAROISSIOU & CHALANDRIOU ST.	ATHENS	151 25	210 811 3000/ 210 811 3399	A0201, A0202, A0401, A0405, A0407, A0409, A0501, A0503, A0602, A0604, A0605, A0801, A0701, A0803, A0901, A1002, A1101, A1103, A0101, A0301, A0403, A0406, A0408, A0410, A0411, A0502, A0601, A0603, A0802
112	INTERNET Q.S.A.	17 TRIAS ST.	ATHENS	112 57	210 884 1141/ 210 884 1176	A0701, A1102, A0201, A0501, A0401
113	INTERSAT S.A.	362 KIFISSIAS AVE.	CHALANDRI	152 33	210 811 8100/ 210 811 8112	A0701, A1001, A0401, A0301, A0601
114	INTRACONNECT S.A.	5 KLISSOURAS ST. & TATOIOU AVE.	METAMORFOSSI	144 52	210 285 5830/ 210 285 5839	A0101, A0201, A0202, A0302, A0401, A0405, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0901, A1001, A1002, A1101, A1102, A1103, A1201, A0301, A0701
115	INTRASTET LTD	19 MANDILARA ST.	LARISSA	412 22	241 028 6609/ 241 053 4433	A0201, A0603, A0604, A0605, A0901, A1002, B0104, C0101
116	ISA E.E.	8 P. TSALDARI ST.	MELISSIA	151 27	210 803 7240/ 210 804 2153	A0101, A0301, A0302, A0409, A0601, A0602, A0603, A1001, A1002, A1201
117	ITEL LTD.	409 VOULIAGMENIS AVE.	ILIOUPOLI	163 46	210 979 0050/ 210 979 0051	A0701, A0401
118	IXNET UK LIMITED	QUEEN VICTORIA 63	LONDON-UK	EC4M4ST	210 683 7520/ 210 685 6658	A0601
119	KALOFOLIAS GROUP S.A.	39 CHALANDRIOU AVE.	MAROUSSI	151 25	210 610 6006/ 210 610 6005	A0401, A0301, A0302, A0604, A0701
120	KAPA-PHONE S.A.	39 CHALANDRIOU AVE.	MAROUSSI	151 25	210 610 6006/ 210 610 6005	A1102
121	KARAVAGELIS DIMITRIOS	10km DRAMA-KAVALA ROAD	DOXATO	663 00	252 106 8971, 252 105 5481/	A1102
122	KENOURGIOS DIMITRIOS	85 MARATHONODROMOU ST.	MAROUSSI	151 25	210 802 6506/ 210 802 6655 252 105 5480	A0604
123	KINETIX TELE. COM	6 AKADIMIAS AVE.	PEFKA	570 10	231 067 3226/ 231 067 3226	A1001, A1002
124	COMPUTER CENTER	8 X. KARAPANAGIOTI ST.	MITILINI	811 00	225 102 8791/ 225 104 3150	A0604, A0701
125	COLUMBIA TELECOM S.A.	22 D. MARGARI ST.	ATHENS	115 25	210 677 9610/ 210 675 6940	A0101, A0701, A0201, A0202, A0301, A0302, A0401, A0402, A1001, A1002, A0601, A0403
126	COSMO ONE HELLAS MARKET SITE	452 MESSOGION AVE.	AG. PARASKEVI	153 42	210 601 9040/ 210 601 9042	A0402, A0404, A0701
127	KYT - NET	5 PANOS ST.	TRIPOLI	221 00	271 022 5151/ 271 023 3072	A0701
128	LAN-NET S.A.	6 CHIMARAS	MAROUSSI	151 25	210 616 7000/ 210 616 7100	A0101, A0201, A0202, A0302, A0403, A0405, A0501, A0503, A0602, A0603, A0604, A0605, A0606, A0901, A1002, A1101, A1102, A1103, A1201, C0101, C0302, C0303, A0301, A0701, A0601, A1001
129	LEMONTEL.COM S.A.	100 KIFISSIAS AVE.	ATHENS	115 26	210 698 4665/ 210 699 0809	A0301, A0401, A0402, A0601, A0604, A0605, A0606, A0701, A1001, A1002
130	LEXITEL S.A.	1 BENAKI ST. & AG. NEKTARIOU ST.	CHALANDRI	152 35	210 606 9500/ 210 606 9510	A1102
131	LINE COMPUTERS	1-3 P. MELA ST.	FLORINA	531 00	238 502 5809/ 238 504 4170	A0701



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132	LINK	9km THESSALONIKIS -THERMIS ROAD	THERMI	570 01	231 048 9390/ 231 048 9394	A0701, A0301, A0401, A0701, A0301, A0601, A0701, A0701, A0403, A1001, A0501, A0502, A0502, A0604, A1001, A1002, A1101, A0401, A0101, A0201, A0202, A0301, A0302, A0401, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0603, A0604, A0605, A0606, A0607, A0901, A1001, A1002, A1101, A1102, A1103, A1202, B0103, B0104, C0101, C0201, C0202, C0204, A0401, A0101, A0201, A0302, A0301, A0601, A0701, A0601, A0701
133	LINK O.E.	6 M. ALEXADROU ST.	KATERINI	601 00	235 107 6916/ 235 107 6916	A0301, A0401, A0701
134	LINX	23-25 ALASTOROS ST.	ATHENS	115 22	210 645 1333/ 210 643 2495	A1001
135	MAKNAN S.A.	57 ALEXANDRAS AVE.	ATHENS	114 73	210 647 0350,1/ 210 647 0352	A1102
136	MAMALAKIS IOANNIS S.A.	13 ETHNIKIS AMINIS ST.	THESSALONIKI	546 21	231 024 4336/ 231 028 7898	A0101, A0201, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410 A0411
137	MANIATEAS ILIAS PUBLISHING ENTERPRISES S.A.	166 IONIAS AVE.	ATHENS	111 44	210 211 4630	A1102
138	MBN S.A. MEDITERRANEAN BUSINESS NETWORK	56 AG. IOANNOU ST.	AG. PARASKEVI	153 42	210 600 6696, 210 601 6836/ 210 639 0565	A0701, A0401
139	MCC	HEIER STR. 13	LICHTENAU- ATTELN-DENMARK	D-3316	+49 529298630 / +49 52922922	A0401, A1102
140	MCI WORLDCOM (HELLAS) ONE MAN LTD	35 JOHN KENNEDY ST.	KESSARIANI	161 21	210 729 7550/ 210 720 9495	A0301
141	MEDIATEL S.A.	10-16 MINOOS ST.	N. KOSMOS	117 43	210 929 6121/ 210 902 8596	A1102
142	MEDITERRANEAN BROADBAND ACCESS S.A.	4 ATTHIDON ST.	KALLITHEA	176 71	210 955 9050/ 210 955 9055	A0101, A0201, A0202, A0301, A0302, A0601, A0602, A0603, A0605, A1001
143	MEDITERRANEAN NAUTILUS GREECE S.A.	SOKRATOUS ST. & 2 KIPROU ST.	MELISSIA	151 27	210 810 2633-5/ 210 803 0555	A0101, A0201, A0202, A0301, A0302, A0501, A0603, A0604, A0605, A0901, A1202
144	MEDITERRANEAN NAUTILUS LTD	INTERNATIONAL HOUSE 3, HARBOURMASTER PLACE	IFSC, DOUBLIN 1 IRELAND		0035314359700/ 0035314359700	A0101, A0201, A0202, A0301, A0302, A0603, A0604, A0605
145	MEGA INTERNATIONAL GREECE LTD	30 VAKCHOU ST.	THESSALONIKI	546 29	231 050 0710-30/ 231 054 0520	A1102
146	MLS INFORMATION TECHNOLOGY S.A.	79 NOVEMBER 17 th ST.	PILEA THESSALONIKIS	544 54	231 092 9090/ 231 093 7222	A0701, A0601, A1001
147	MULTICOM S.A.	209 KIFISSIAS AVE.	MAROUSSI	151 24	210 614 1106/ 210 809 7721	A0101, A0201, A0301, A0402, A0403, A0404, A0501, A0502, A0503, A0604, A0701, A0802, A0901, A1002, A1103, A0401
148	MULTIDATA S.A.	41-45 MARINOU ANTIPIA ST.	N. HERAKLIO	141 21	210 270 5340/ 210 270 5398	A1102, A1103
149	M-WEB S.A.	MANIS KANTZA	PALLINI	153 51	210 660 2200/ 210 604 1610	A0201, A0202, A0401, A0604, A0701, A1002, A1101, A1102, B0102, B0103, B0301
150	NEA PILI S.A.	25-29 KARNEADOU ST.	ATHENS	106 75	210 725 4464/ 210 725 4637	A0101, A0201, A0202, A0301, A0302, A0401, A0402, A0404, A0405, A0407, A0501, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A1001, A1002, A1103



No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORISATION
151	3 NET S.A.	23-25 LEKKA ST.	ATHENS	105 62	210 322 9885/ 210 322 2452	A0101, A0601, A0602, A0603, A0604, A0605, B0101, B0103, B0301, B0401
152	NET CAFE	10 SPILIADOU ST.	PREVEZA	481 00	268 202 7230	A0701
153	NET ONE S.A.	2 PERIKLEOUS ST.	N. PSICHIKO	154 51	210 678 1300/ 210 678 1390	A0202, A0601, A0401, A0301, A0701
154	NET ON LINE	18 PANEPISTIMIOU ST.	ATHENS	106 72	210 333 3555/ 210 324 6850	A0301, A0401, A0701
155	NETEPLAN LTD	46 SOLOMOU ST.	ATHENS	106 82	210 330 0793/ 210 380 1223	A0701, A0401, A0101, A0201, A0301, A0302, A0501, A0604, A0605, A0901
156	NEWSPHONE HELLAS S.A.	280 THISSEOS AVE.	KALLITHEA	176 76	210 947 2222/ 210 947 2223	A1102
157	NIKOLETOPOULOS A.	13 PERLIAS ST.	POROS TRIZINIAS	180 20	229 802 6255	A0701
158	NONDAS I.N.S.	AV. DU CONDOR 25	BRUXELLES	10 80	+32495536988/ +32974638857	A0101, A0201, A0301, A0601, A0602, A0603, A0604, A0605, A0606, A0701, A1001, A1002, A1201, A0607
159	NONDAS I.N.S. TELECOM	181 DIMOSTHENOUS ST.	KALLITHEA	176 75	210 953 7226, 210 953 7222/ 210 953 7224	A0101, A0201, A0301, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A1001, A1002, A1201
160	NYX INTERNET	14 BOUBOULINAS ST.	ATHENS	106 82	210 383 9044-5/ 210 383 9044-5	A0701
161	OK S.A.	148 DOIRANIS ST.	KALLITHEA	176 43	210 953 1600/ 210 957 8784	A0701, A0901, A1002, A1101
162	OLYMPUS NET LTD	14 P. TSALDARI ST.	KATERINI	601 00	235 107 7316, 235 107 7516/ 235 107 7576	A0701
163	OMEGANET S.A.	SIFNEON ST. & 11 AGIOPLASTON ST.	MAROUSSI	151 25	210 610 6060/ 210 618 0579	A0701, A0401
164	ORGANOTIKI COMPUTERS O.E.	30 TANTALOU ST.	THESSALONIKI	546 29	231 053 3694/ 231 055 1385	A0701, A0401
165	ORIZON LTD	1 PERGAMOU ST.	N. FILADELFIA	143 41	210 258 8695/ 210 253 3734	A1101, A1102, A1103
166	OTE	99 KIFISSIAS AVE.	MAROUSSI	151 25	210 611 5011/ 210 6117456	A0101, A0201, A0202, A0301, A0302, A0303, A0401, A0402, A0403, A0405, A0406, A0410, A0501, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0801, A0802, A0803, A0901, A1001, A1101, A1102, A1103, A1201, B0101, B0102, B0201, B0301, C0101, C0201, C0202, C0203, C0204, C0205, C0301, C0302, C0303, C0401, C0402, C0403, C0501
167	OTEGLOBE S.A.	99 KIFISSIAS AVE.	MAROUSSI	151 24	210 611 5400/ 210 611 5399	A0101, A0201, A0202, A0301, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0801, A0802, A0803, A0901, A1001, A1002, A1101, A1102, A1103, A1201
168	OTENET S.A.	56 KIFISSIAS AVE. & DELFOU ST.	MAROUSSI	151 25	210 615 1600/ 210 6151700	A0201, A0202, A0301, A0401, A0409, A0602, A0603, A0604, A0605, A0701, A0901, C0204, A0501, A1002, A1101, A1103, A0407
169	OULASSOGLOU I. / ZEUS	10 DIMITRIOU & KARAOLIST.	DRAMA	661 00	252 104 7797	A0701
170	OUTSOURCE S.A.	3 FOKEAS ST.	PIREAS	185 47	210 489 9320-323/ 210 489 9184,-86	A0101, A0201, A0202, A0401, A0701



No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORISATION
171	PALITSKARIS XENOFON	18 OCTOBER 20 th ST.	GIANNITSA	581 00	238 208 3200/ 238 202 3733	A0401, A0604, A0701
172	PANATEL S.A.	294 SINGROU AVE.	KALLITHEA	176 73	210 957 6625/ 210 957 8750	A0301, A0603, A0604, A0607, A1001, A1002, A1101, A1102, A1201
173	PAPAVASSILIOU E & A O.E.	7 PLASTIRA ST.	KARDITSA	431 00	244 107 5344/ 244 107 2344	A0701, A0401
174	PAPASINEFAKIS ATHANASSIOS	25 SKOUFA ST.	ELASSONA, LARISSA	402 00	249 302 2120	A1102
175	PERTHO S.A. RADIOTELEVISION ENTERPRISES	1km. FILIROS- LAGADAS RD.	FILIRO	570 10	231 067 8451/ 231 067 8454	A0101, A0201, A0301, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0801, A0802, A0803, A0901, A1001, A1002, A1101, A1102, A1103, A1201, A1202, B0101, B0102, B0103, B0104, B0201, B0301, B0401, B0501, C0101, C0201, C0202, C0203, C0204, C0205, C0301, C0302, C0303, C0401, C0402, C0403
176	PETROULAKIS G. S.A.	11 ALEXANDRAS AVE.	ATHENS	114 73	210 642 9829	A0301, A0601, A0701, A1001 A1002, A1101, A1102, A1103, A1201, B0601
177	PG COM	30 AMIKLON ST.	CHALANDRI	152 31	210 674 6777/ 210 674 6446	A0701
178	PLANET LINE	80 KIPROU ST.	LARISSA	412 22	241 053 3193	A0401, A0901, A1102
179	POLIGRAMO NETWORK S.A.	100 KIFISSIAS AVE. & 83 MARATHONODROMOU ST.	ATHENS	151 25	210 614 4226/ 210 614 4231	A0301, A0701, A1001, A1002, A1101, A1102
180	POWERNET	41-45 MARINOU ANTIPA ST.	N. HERAKLIO	141 21	210 270 5300/ 210 270 5399	A0701
181	PREMIUM SERVICES HELLAS ONE-PERSON LTD	15 KIFISSIAS AVE.	MAROUSI	151 25	210 689 6761/ 210 689 6762	A0101, A0201, A0301, A0302, A0401, A0402, A0403, A0404, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0901, A1001, A1002, A1101, A1102, A1201
182	PRIMUS CALL S.A.	159 G. PAPANDEOU ST.	METAMORFOSSI	144 52	210 288 8885/ 210 288 8886	A1102
183	PRIORITY LTD	19 PENTELIS AVE.	VRILISSIA	152 35	210 683 5876/ 210 683 5895	A0201
184	PRISMA ELECTRONICS S.A.	85 DIMOKRATIAS AVE.	ALEXANDROUPOLI	681 00	255 103 5013/ 255 103 4916	A0701, A0401
185	RAINBOW COMMUNICATIONS	75 ILIA ILIOU ST.	ATHENS	117 44	210 901 2892/ 210 901 2540	A0604, A0701
186	SANYOCOM S.A.	12km ATHENS-LAMIA RD.	METAMORFOSSI	144 51	210 289 4600/ 210 289 4672	A0202, A0601, A0301, A0403, A0701
187	SAVVIS EUROPE B.V.	17 VALAORITOU ST.	ATHENS	106 71	210 369 2800/ 210 369 2807	A0202, A0301, A0605, A0701, A0201
188	SEND IT S.A.	53 AG. IOANNOU ST.	AG.PARASKEVI	153 42	210 608 4860/ 210 608 4861	A1102, B0103
189	SERVICE 800 - TELEPERFORMANCE	330 THISSEOS AVE.	KALLITHEA	176 75	210 940 3373/ 210 940 3383	A1102
190	SETCOM LTD	98 AKADIMIAS ST.	ATHENS	106 77	210 330 3377/ 210 382 2039	A0604
191	SITA	SOFOKLEOUS ST. & 101 RIZOUNTOS ST.	ELLINIKO	167 77	210 969 6096/ 210 969 6030	A0301, A0601, A0604, A0401, A0402, A0403, A0409, A1002, A0605, B0501
192	SKIATHOS MUNICIPALITY	12 NIKOTSARA ST.	SKIATHOS	370 02	242 702 2240/ 242 702 3150	A0701
193	SOFT-HARD	21 MARCH 25 th ST.	PTOLEMAIDA	501 00	246 302 2450	A0701, A0401
194	VOICENET	5 PROFITI ILIA SQ.	PANGRATI	116 35	210 757 3100/ 210 757 3111	A0301, A0403, A0601, A0701
195	SPACE LINE S.A.	89 D. GOUNARI ST.	MAROUSI	151 25	210 802 9959/ 210 802 6324	A1102



No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORISATION
196	SPACENET S.A.	308 MESSOGION AVE. & 2 ARKADIOU ST.	CHOLARGOS	155 62	210 650 4244/ 210 650 4388	A0601, C0301, A0201, A0202, A0404, A0605, A0901, B0301, A0701
197	SPARKNET S.A.	40 MARINOY ANTIPA ST.	THESSALONIKI	570 01	231 047 1222/ 231 047 6333	A0701, A0401, A0405, A0411, A0604, A0605, A0901, A0101, A0201, A1002
198	STARCOM S.A.	12 FORMIONOS ST.	ATHENS	116 34	210 729 2980/ 210 729 7757	A0403, A0601, A0701, A1001, A0201, A0202, A0301, A0603
199	STARGATE NETWORKS S.A.	3 XANTHOU ST.	GLIFADA	166 75	210 898 5200/ 210 898 5201	A0701, A0401
200	STET HELLAS S.A.	66 KIFISSIAS AVE.	MAROUSSI	151 25	210 615 8000/ 210 610 6497	A0202, A0701, A1001, A0101, A0201, A0401, B0102, B0103, B0104, B0401
201	STSNET S.A.	1km HERAKLIO-MIRES NATIONAL ROAD	HERAKLIO CRETE	711 10	281 026 3300/ 281 026 3300	A0201, A0701, A0301, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A1001, A1002, A1101, A1102, A1103, A1201, A1202, A0101
202	TARGET LINE	8 ALEXANDRAS AVE.	ATHENS	106 82	210 821 9074/ 210 822 5381	A1102
203	TASSIDIS ARCHONTIS	13 DASSIOU SQ.	ORESTIADA	682 00	255 102 8340	A0701
204	TARGET LTD	2 IRODOU ATTIKOU ST.	THESSALONIKI	546 25	231 055 3621/ 231 054 6481	A0701, A1102
205	TECHNICAL PUBLICATIONS S.A.	2-4 ILIOUPOLEOS ST.	IMITTOS	172 37	210 996 2500/ 210 979 2528	A0701
206	TECHNOPOLIS S.A.	2-4 ILIOUPOLEOS ST.	IMITTOS	172 37	210 979 2500/ 210 979 2528	A0701, B0103
207	TELCOMAT S.A.	178 PAPAFI ST.	THESSALONIKI	544 53	231 090 0517/ 231 091 5504	A0701, A0401
208	TELECOM ITALIA S.P.A.	PIAZZA DEGGLI AFFRI 2	MILAN-ITALY		+39 063 6881, +39 063 9231/ +39 063 688 2965	A1001
209	TELEDATA COMMUNICATIONS	4 AMALIADOS ST.	AMBELOKIPI	115 23	210 646 2254/ 210 646 2254	A0301
210	TELEDOME S.A.	10 FILARETOU ST. & DOIRANIS ST.	KALLITHEA	176 72	210 956 9277/ 210 956 3882	A0201, A0202, A0301, A0403, A0601, A0701, A1001, A0101, A0501, A0502, A0503, A0603, A0604, A0605, A0606, A0607, A0801, A0802, A0803, A0901, A1002, A1101, A1102, A1103, A1201, B0101, B0102, B0103, B0104, B0201, B0301, B0401, B0501, A0302, A0401, A0602, C0101
211	TELEPASSPORT (HELLAS) S.A.	81 PATISSION ST. & 8 HEYDEN ST.	ATHENS	104 03	210 820 9000/ 210 820 9009	A0401, A0402, A0403, A0601, A1001, A1002, A1101, A0101, A0201, A0202, A0302, A0602, A0603, A0604, A0606, A0901, A1201
212	TELESTAND S.A.	18 SOLONOS ST.	ATHENS	106 71	210 360 1436/ 210 360 1474	A0101, A0201, A0301, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0801, A0802, A0803, A0901, A1001, A1002, A1101, A1102, A1201, B0101, B0102, B0103, B0104, B0301, C0101, C0201, C0202, C0203, C0204, C0205, C0301, C0302, C0303
213	TELESYSTEM HELLAS	20 AN. TSOCHA ST.	ATHENS	115 21	210 645 4424/ 210 645 4252	A1001, A1002, A1101, A1102, A1103, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411



No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORISATION
214	TELLAS	1A & 3 NEAPOLEOS ST.	MAROUSSI	151 23	210 811 3411/ 210 811 3459	A0701
215	TESAE A.T.E	26 XLOIS ST.	ZOGRAFOU	157 72	210 748 8705, 210 748 8795/ 210 778 0490	A0401, A0402, A0403, A0404 A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0901, A1001, A1002, C0301, C0302, C0303, A0701
216	THEMA PUBLICATIONS LTD	31 EPIKOUROU ST.	ATHENS	105 53	210 331 5316/ 210 324 8363	A1101, A1102
217	THESSALIA ON LINE	91 S. SPIRIDIS ST.	VOLOS	382 21	242 102 0760/ 242 103 3291	A0604, A0701
218	THESSALIKI TELEMATICS	26 ASKLIPIOU ST.	TRIKALA	421 00	243 107 5758/ 243 107 5759	A0701
219	TRANSNET COMMUNICATIONS S.A.	3 MESSOGION AVE.	ATHENS	115 26	210 747 2991-3/ 210 747 2994	A1102
220	UNITEL HELLAS S.A.	152 SEVASTOUPOLEOS ST.	ATHENS	115 26	210 950 4780, 210 950 4765/ 210 950 4781	A0202, A0601, A1001, A0402, A0405, A0407, A0409, A0411, A0301, A0701, A0401, A0403, A0404, A0406, A0408, A0410
221	URNET SYSTEMS S.A.	112 EL. VENIZELOU ST.	ILIOUPOLI	163 45	210 992 2922/ 210 992 3720	A0701, A0301, A0401, A0604, A0901, A1002,
222	UUNET HELLAS INTERNET SERVICE PROVIDER M. LTD	452 MESSOGION AVE.	AGIA PARASKEVI	153 42	210 809 9917/ 210 809 9777	A0701, A1011, A0201, A0202, A0301, A0302, A1001, A1002
223	VALKANIKI TILEPIKINONIAKI LTD	8 KANARI ST.	PIREAS	185 38	210 459 9076, -77/ 210 459 9078	A0601, A1001, A0301, A0701
224	VERGINA NETWORK	12 MITROPOLEOS ST.	VERIA	591 00	233 102 3202/ 233 106 0007	A0401, A0701
225	VIVODI TELECOMMUNICATIONS S.A.	29-31 DERIGNY ST. & 18 ELPIDOS ST.	ATHENS	104 34	210 889 3700/ 210 889 3701	A0201, A0301, A0302, A0401, A0403, A0501, A0502, A0503, A0601, A0602, A0604, A0605, A0606, A1001, A1002, A1101, A1102, A1201, A0701
226	VIZZAVI (HELLAS) S.A.	56 KIFISSIAS AVE. & DELFON ST.	MAROUSSI	151 25	210 617 3202/ 210 617 3274	A1102, A0401, A0701, A0901, A1002, A1101, B0102, B0103, B0104, B0201, C0301, C0303
227	VODAFONE-PANAFON	44 KIFISSIAS AVE.	MAROUSSI	151 25	210 616 0000/ 210 616 0001	A0101, A0201, A0604, B0103, B0301, B0401, A1102, A0202, A0301, A0601, A0701, A1001
228	VOICE WEB	40 AG. KONSTANTINOU ST. (ATRIUM SHOPPING CENTRE, OFFICE A37)	MAROUSSI	151 24	210 619 6775/ 210 617 8140	A0601, A0602, A0603, A0604, A0605, A0606 A0607, A1101, A1102, A1103, B0102, B0103, B0104
229	WEB COMMUNICATIONS LTD	64 MOUTALASKI ST.	N. IONIA	142 34	210 272 0006/ 210 271 4008	A0403, A1001, A1002, A1101, A1102, A1103
230	WEST NET S.A.	17 GEROKOSTOPOULOU ST.	PATRA	262 21	261 062 4070/ 261 062 3955	A0701, A0401
231	WESTRA COM INFOCIENCE	39 PERIKLEOUS ST.	CHOLARGOS	155 61	210 653 5522 / 210 654 6886	A0701, A0101, A0201, A0301, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0801, A0802, A0803, A0901, A1001, A1002
232	WIRELESS GR	48 ERECHTHIOU ST.	ALIMOS	174 55	210 960 0621/ 210 964 8677	A0701
233	WORLD STATE LINE M LTD	90 CHR. SMIRNIS ST.	MOSCHATO	183 45	210 941 1150/ 210 948 4150	A0201, A1001, A1002, A1102
234	WWA	2 ERGATON TIPOU ST.	ILIOUPOLI	163 46	210 995 9063/ 210 995 9064	A0701, A0401, A1001, A1002, A1101, A0301, A0601
235	ZEPHYR HELLAS S.A.	321 MESSOGION AVE.	CHALANDRI	152 31	210 650 4100/ 210 651 6712	A0101, A0201, A0202, A0301, A0302, A0401, A0402, A0403, A0404, A0501, A0503, A0601, A0602, A0603, A0604, A0605, A0701, A0901, A1001, A1002, A1101, A1201, A1103



Appendix IV

Codification of Telecommunications Services

A. CLASSES OF FIXED TELECOMMUNICATIONS SERVICES			
A01.	Provision of Fixed Network Transmission (excluding Satellite Transmission Lines)	A0101	Provision of fixed network transmission lines (leased Lines) to the public, via (entirely or in part) a network infrastructure owned and/or managed by the declarant
A02.	Capacity Leasing	A0201	Leasing of capacity to the public, via (entirely or in part) a network infrastructure owned and/or managed by the declarant
		A0202	Provision of Private Virtual Network (PVN) to the public, via (entirely or in part) a network infrastructure owned and/or managed by the declarant
A03.	Data Transmission Services	A0301	Packet-switched data transmission
		A0302	Circuit-switched data transmission
		A0303	Telex service without allocation of numbers under the NNP
A04.	Value-Added Data Services	A0401	Electronic mail (e-mail)
		A0402	Electronic Data Interchange (EDI)
		A0403	Value-added facsimile service
		A0404	Accounting services / Electronic Funds Transfer (EFT)
		A0405	Remote control services
		A0406	Teletex
		A0407	Videography services
		A0408	Teletyping services
		A0409	Teleprocessing services
		A0410	Telegraphy services
		A0411	Telemetry services
A05.	Integrated Value-Added Services	A0501	Videconferencing
		A0502	Business TV
		A0503	Viewphone
A06.	Network Management Services	A0601	Network operation for Closed User Groups, including the provision of general telecommunications services (including voice switching)
		A0602	Network operation for Closed User Groups, including the provision of general telecommunications services (excluding voice switching)
		A0603	Provision of gateways between networks belonging to different parties
		A0604	Network access services, e.g. for access to networks of mailbox providers, on-line information service and/or Internet service providers
		A0605	Network support services
		A0606	Intelligent Network (IN) services
		A0607	Automatic Call-back services
A07.	Internet Services	A0701	Provision of Internet services
A08.	Technical Provision of Broadcasting Services	A0801	Transmission of audio and/or TV signals between installations of Broadcasting Companies
		A0802	Relaying of Broadcasting signals
		A0803	Distribution of Broadcasting signals - via terrestrial relay stations - via cable networks
A09.	Technical Provision of Multimedia Services	A0901	Provision of multimedia services
A10.	Voice Services	A1001	Voice Telephony services for the public, via (entirely or in part) a network infrastructure owned and/or managed by the declarant, without allocation of numbers under the NNP
		A1002	Voice services provided via the Internet



A. CLASSES OF FIXED TELECOMMUNICATIONS SERVICES			
A11.	Value-Added Voice Services	A1101	Voice mailbox
		A1102	Audiotex
		A1103	Audioconference services
A12.	Public Telecommunications Stations	A1201	Provision of public phones
		A1202	Other telecommunications stations
A13.	Other Telecommunications Services		

B. CLASSES OF MOBILE RADIOCOMMUNICATIONS SERVICES			
B01.	Mobile Voice Services	B0101	Voice transmission for the public, without allocation of numbers under the NNP
		B0102	Facsimile and data transmission
		B0103	SMS (Short Messaging Service)
		B0104	Mailbox Services
B02.	Radio Call Services	B0201	Unidirectional transmission of news (sound, drawings and/or text)
B03.	Radiocommunications Services	B0301	Voice and data transmission for Closed User Groups within Closed User Groups
B04.	Mobile Radio Data Services	B0401	Packet-switched data transmission
B05.	In-flight Telephony Services	B0501	Voice, data and facsimile transmission
B06.	Other Telecommunications Services		

C. CLASSES OF SATELLITE SERVICES			
C01.	Provision of Satellite Transmission Lines	C0101	Provision of satellite transmission lines to the public, via (entirely or in part) a network infrastructure owned and/or managed by the declarant
C02.	General Satellite Services	C0201	Broadcasting distribution services
		C0202	Business TV
		C0203	Satellite News Gathering
		C0204	Data transmission services
		C0205	Videoconference
C03.	Mobile Satellite Services	C0301	Fleet Management/ Position-Finding Services
		C0302	Telephony services
		C0303	Data services
C04.	Satellite Broadcasting Services	C0401	Transmission of audio and TV signals between Broadcasting Stations
		C0402	Transmission of broadcast signals
		C0403	Distribution of broadcast signals
C05.	Other Telecommunications Services		



EXPLANATIONS	
A0101	The telecommunications means-facilities that offer capacity for transparent transmission between terminal points of the network, without offering optional switching capabilities (switching operations that may be controlled by the user as part of the leased line).
A0201	Leasing to the public of a part of the capacity of telecommunications lines, via (entirely or in part) a network infrastructure owned and/or managed by the declarant.
A0202	Provision of a Private Virtual Network via (entirely or in part) a network infrastructure owned and/or managed by the declarant. Private Virtual Network is the section of the corporate network that provides network services using common switching network infrastructure.
A0301	Packet-switched transmission of digital information using specific standards, such as X.25, FPS (Fast Packet Switching) etc.
A0302	Circuit-switched transmission of digital information using specific standards, such as X.21.
A0303	Telegraphic service allowing direct temporary communication between subscribers, using a start-stop device and telecommunications circuits of the public telecommunications network.
A0402	Transmission of digital information using EDI standards.
A0403	Transmission of information stored in a database, using retrieval from the memory and automated mass-transmission.
A0404	Transmission of data for processing transactions between computers supporting running general accounting applications, as well as between computer systems supporting electronic payments (e.g. clearing systems etc.).
A0405	Transmission of data for remote control, tele-monitoring and remote diagnosis (excluding services for remote control of the operation of telecommunications networks/systems through private usage switchers).
A0406	Telematic service for transmission of text, offering additional facilities compared to the telex service and, more specifically, typing and remote text processing functions.
A0407	Telecommunications form in which information (generally in the form of digital data) is transmitted primarily in order to allow its selection and display to the user, in the form of text or image, using a visual display unit such as a TV monitor.
A0408	Telecommunications service having as its purpose to transmit and simultaneously regenerate graphics in a remote terminal, in the form in which they had been written or designed in the sending terminal.
A0409	Service that combines telecommunications techniques with data processing techniques, with the aim to remotely process information.
A0410	Telecommunications service in which the information transmitted is intended to be recorded, upon reception, as a graphics string. The information transmitted may sometimes be displayed in an alternative format or may be stored for future use.
A0411	Procedure in the context of which measurements take place at remote locations and the results are transmitted via telecommunications networks.



EXPLANATIONS	
A0501	Teleconferencing service, where the participants are connected via circuits allowing the transmission of fully moving image, voice, text and data.
A0502	Broadband transmission of audio and TV signals to Closed User Groups (e.g. for educational purposes).
A0503	Service combining telephony techniques with TV techniques, allowing users to see each other during their telephone communication.
A0601	Operation and management of telecommunications networks for Closed User Groups, including voice switching capabilities.
A0602	Operation and management of telecommunications networks for Closed User Groups, without voice switching capabilities.
A0603	Provision of gateways, in order to achieve interconnection between networks belonging to different parties.
A0604	Provision of gateways in networks, e.g. networks of voice mailbox providers, on-line information service providers and Internet providers (including the services provided in these networks, such as e-mail, fax etc.).
A0605	Transmission of data for remote control, tele-monitoring, remote diagnosis and support of telecommunications networks or systems.
A0606	Network services, provision of which requires Intelligent Network features and functionalities (e.g. the called party assumes payment of telephone charges, etc.).
A0607	Provision of (international) connections using the automatic call-back method.
A0701	Services that are provided via the Internet and do not belong to any of the other classes described above.
A0801	Transmission of audio and/or TV signals between Broadcasting Companies, via external transmission and distribution lines, as well as via programme exchange lines.
A0802	Transmission of audio and TV signals from the radio or TV station to the broadcasting distribution networks.
A0803	Distribution of broadcasting signals to subscribers, via broadcasting distribution networks using cable networks and/or terrestrial relay stations.
A0901	Transmission and management of multimedia services via telecommunications networks. Multimedia services include teleshopping, tele-education, video-on-demand, pay-per-view or similar services.
A1001	Real-time voice transmission and/or switching, via (entirely or in part) a network infrastructure owned and/or managed by the declarant, without allocation of numbers under the NNP (including the provision of general facsimile services).
A1002	Voice services provided via the Internet and without allocation of numbers under the NNP.
A1101	Provision of voice memory, where voice mail may be deposited and retrieved.
A1102	Provision of technical infrastructure for retrieval of information and entertainment programmes via a specific call number.
A1103	Teleconferencing service, where the participants are connected via circuits supporting the transmission of voice. In addition to voice, other signals (such as facsimile or telewriting) can also be transmitted.
A1201	Provision of public phones (including provision of general facsimile services).
A1202	Provision of other telecommunications stations.



EXPLANATIONS	
B0101	Real-time voice transmission and/or switching, via (entirely or in part) a mobile telephony network infrastructure owned and/or managed by the declarant, without allocation of numbers under the NNP. Call forwarding is through cellular analogue or digital terrestrial radio networks and points providing interconnection with public fixed networks.
B0102	Facsimile services (printed or computer-generated fax) and data transmission services.
B0103	Transmission of short messages (up to 160 alphanumeric characters).
B0104	Provision of voice memory.
B0201	Analogue and digital transmission of signal, which introduces sound series or alphanumeric characters to mobile receivers.
B0301	Analogue or digital transmission of voice and data to a restricted user group. Transition to a fixed network is one option.
B0401	Transmission of digital information by packet switching via virtual connections, using specific standards (e.g. X.25) on a mobile data radio network. Transition to a fixed network is possible.
B0501	Voice, data and facsimile communications with fixed and mobile networks, for passengers of airborne vehicles, via terrestrial radio stations.
C0101	The telecommunications means-facilities that offer capacity for transparent transmission between terminal points of the satellite network, without offering optional switching capabilities (switching operations that may be controlled by the user as part of the leased line).
C0201	Unidirectional data transmission in the form of point-to-multipoint connections.
C0202	Broadband transmission of audio and TV signals to one or more receiving stations of a selected group of users.
C0203	Transmission of video from the location where it takes place to a TV studio, via mobile satellite transmission systems.
C0204	Provision of unidirectional or interactive data transmission paths to the installations of subscribers, via satellite systems.
C0205	Teleconferencing service, where the participants are connected, via suitable satellite links, for the transmission of fully moving image, voice, text and data.
C0301	Transmission of alphanumeric data and information between a central station and moving units (vehicles) and radiolocation.
C0302	Real-time voice transmission and/or switching, via analogue and/or digital satellite networks.
C0303	Data transmission and/or switching via analogue and/or digital satellite networks.
C0401	Transmission of audio and TV signals between broadcasting station, via satellite links.
C0402	Transmission of broadcast signals from the broadcasting station to the corresponding broadcasting distribution satellites.
C0403	Distribution of broadcast signals for direct satellite reception by broadcasting subscribers.



Appendix V

List of Undertakings Licensed to provide Postal Services (as in force on 31 December 2002)

No	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	PC	CITY	TEL./FAX	REG. NO.
1	A. PAPAZOGLOU & CO O.E.	A. PAPAZOGLOU & CO O.E.	88 OCTOBER 23 RD ST.	412 23	LARISSA	241 023 9828/ 241 023 7534	01-207
2	A.C.S INTERNATIONAL TRANSPORTATIONS & FACILITIES S.A.	A.C.S S.A.	25 ASKLIPIOU ST.	145 68	KRIONERI ATTIKIS	210 819 0000, 210 819 0100 / 210 819 0261	99-122
3	ABARTSIDIS A. - PARASKEVAS X. O.E.	SWIFT MAIL EXPRESS COURIER	74 FILIPPOU ST.	546 35	THESSALONIKI	231 020 0251 231 020 0327/ 231 020 2576	99-092
4	ACES COURIERS TRANSPORTATIONS LOGISTICS OPERATIONAL SERVICES	THE ACES THAT GO ANYWHERE	5-7 KLISSOURAS ST.	161 21	ATHENS	210 725 7770/ 210 724 9370	99-135
5	ADAMOPOULOU ATHANASIA	CITY COURIER	211-213 IONIAS AVE.	111 45	ATHENS	210 211 3065, 210 211 3061	0-161
6	ADCO - A. & P. ANTONOPOULOS LTD	ADCO	54 G. PAPANDEIOU ST.	135 62	AG. ANARGIRI	210 269 0000-8/ 210 269 0150	00-164
7	ALAMANOU G. MARIA	RABBIT COURIER	3 ARGOSTOLIOU ST.	113 62	ATHENS	210 884 0647/ 210 882 6255	99-074
8	ALATERA VASILIKI	ALATERA VASILIKI	4 KILKIS ST.	814 00	LIMNOS	2254 402 4081/ 2254-0-24081/ 2225 402 4143	01-213
9	ALKIVIADIS K. BOURDARAS	S.A.S.	31 TRIPOLEOS ST.	173 41	AG. DIMITRIOS	210 931 0494, 210 931 0222	00-162
10	ALMAN HELLAS PERIFERALS LTD	ALMAN HELLAS LTD	23 ORTANSIAS ST.	136 77	ACHARNES	210 240 9150/ 210 240 9155	02-001
11	ANAGNOSTOPOULOS IOANNIS	ANAGNOSTOPOULOS IOANNIS	1A DIOIKITIRIOU ST.	502 00	PTOLEMAIDA	246 302 6550/ 246 302 6550	01-286
12	ANASTASSAKI NIKI	ANASTASSAKI NIKI	2 DAGRE ST.	212 00	ARGOS	275 102 3855/ 275 106 3252	02-024
13	ANTONIOU KONSTANTINOS	RAINBOW EXPRESS COURIERS	40 MIRONOS ST.	173 43	AGIOS DIMITRIOS	210 976 5687/ 210 971 8342	99-142
14	APOSTOLATOU CHRISTINA	COURIER SERVICE WORLDWIDE	5 A. METAXA ST.	281 00	ARGOSTOLI	267 102 3426/ 267 102 3426	99-060
15	APOSTOLIDIS IOANNIS	APOSTOLIDIS IOANNIS	KILA	501 00	KOZANI	246 103 9806/ 246 103 9406	02-007
16	ARAMEX (HELLAS) INTERNATIONAL TRANSPORTATION S.A.	ARAMEX (HELLAS)	34 VOULIAGMENIS AVE.	164 52	ARGIROUPOLI	210 995 8950-5/ 210 995 8849	99-130
17	ARMAOS L. - FIRIGOS I. LTD	ARMAOS LTD	12 IKONOMOU ST.	106 83	ATHENS	210 383 3417, 210 330 2163/ 210 381 0249	02-052



No	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	PC	CITY	TEL./FAX	REG. NO.
18	ATHANASIOS SIROKOS	ATHANASIOS SIROKOS	38 GRIVA ST.	301 00	AGRINIO	264 102 9789/ 264 102 9789	02-075
19	AVGOUSTAKI IRINI	AVGOUSTAKI IRINI COURIER	117 ETHN. ANTISTASSEOS ST.	713 07	HERAKLIO CRETE	281 028 4828, 281 028 4010/ 281 028 4010	01-227
20	AVRAMOPOULOS KONSTANTINOS	ACHAIKI COURIER	126 KORINTHOU ST.	262 23	PATRA	261 062 3072/ 261 027 7480/ 261 027 7480	01-296
21	BELITSOS ANASTASIOS	EVIA EXPRESS COURIER	18 CHARALABOUS ST.	341 00	CHALKIDA	222 107 6458, 222 102 6008/ 222 106 0563	00-174
22	BENEKIS NIKOLAOS	IKAROS NET	134 SKIATHOU ST.	112 55	ATHENS	210 346 2568/ 210 346 2568	02-053
23	BIKAKIS K. - GEORGIOU Z. O.E.	HELLAS EXPRESS COURIER	21 - 23 SACHTOURI ST.	185 36	PIREAS	210 418 3975 / 210 418 3975	02-036
24	BRATSIAKOU CHARALABIA	BRATSIAKOU CHARALABIA	18 VAS. OLGAS ST.	241 00	KALAMATA	272 109 6903/ 272 102 8606	01-279
25	CAPITAL EXPRESS COURIER A.E.E.	CAPITAL EXPRESS	277 EL. VENIZELOU ST.	176 74	KALLITHEA	210 941 4360	00-188
26	CAPOCCI AIR SYSTEM LTD	CAPOCCI AIR SYSTEM LTD	MEGARIDOS ST., SINTRIVANI LOCALITY	193 00	ASPROPIRGOS	210 550 0551/ 210 550 0531	02-077
27	CH. VARDAKAS - A. KAVADIAS O.E.	GALAXY WORLDWIDE	3 ALKIONIAS ST.	116 31	ATHENS	210 752 0014, 210 752 0016/ 210 752 0021	99-109
28	CHALKIADAKIS IOANNIS	CHALKIADAKIS IOANNIS	13 ARKOLEONTOS ST.	712 02	HERAKLIO CRETE	281 034 1870/ 281 034 4690	00-175
29	CHARIKLIA KANTZA	KANTZAS COURIER	28A VIRONOS ST.	351 00	LAMIA	223 103 9564, 233 104 2474/ 223 102 9285	02-005
30	CHASSIOTIS EL. & CO E.E.	CHASSIOTIS EL. & CO E.E.	33 P. P. GERMANOU ST.	546 22	THESSALONIKI	231 024 2385 / 231 024 2544	99-128
31	CHATZIGEORGIOU NIKOLAOS	CHATZIGEORGIOU NIKOLAOS	87 CANADA ST.	851 00	RODOS	224 103 0917/ 224 107 4229	01-217
32	CHINOS DIMITRIOS	COURIER TOP SPEED	30 KONSTANTI- NOUPOLEOS ST.	136 71	ACHARNES	210 268 5714/ 210 231 6145	99-024
33	CHRISOULI ALEXANDRA	CHRISOULI ALEXANDRA	7 KOUNTOURIOTI ST.	652 01	KAVALA	251 023 2051, 251 062 0671/ 251 023 2051	01-281
34	CHRISSAFOPOULOS DIMITRIOS	CHRISSAFOPOULOS DIMITRIOS	57 LEONIDOU ST.	351 00	LAMIA	223 104 6416/ 223 104 6416	01-199
35	CHRONAKOS ANASTASIOS	FLIGHT EXPRESS	228 SOKRATOUS ST.	176 74	KALLITHEA	210 941 1624, - 210 941 1672 210 941 1674/ 210 941 1616	99-008
36	CHRONOPOULOU ASSIMINA & CO E.E.	ORDER TAKER	25 MARMARA ST.	114 76	ATHENS	210 645 2500-6/ 210 645 7170	99-137
37	CITY MESSENGERS COURIERS S.A.	CITY MESSENGERS S.A.	4 SEFERI ST.	144 52	METAMORFOSSI	210 285 6391/ 210 283 6888	01-232



No	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	PC	CITY	TEL./FAX	REG. NO.
38	COURIER ERMIS LTD	COURIER ERMIS LTD	51 SP. TRIKOUPH ST.	106 83	ATHENS	210 822 0800/ 210 825 0982	99-132
39	COURIER OFFICE - SPEEDLINE LTD	SPEEDLINE	35 LAGKADA ST.	546 29	THESSALONIKI	231 055 7036/ 231 055 7036	99-106
40	D. KAPELAKIS - V. BARDAKIS O.E.	PEGASUS COURIER	8 ENIANOS ST.	104 34	ATHENS	210 825 3409, 210 825 3410/ 210 825 3625	01-222
41	D.K.S COURIERS LTD	D.K.S	32A AG. ANARGIRON ST.	151 24	MAROUSSI	210 610 9660-2-6/ 210 610 9660	99-111
42	DEDELOUDI ANGELIKI	DEDELOUDI ANGELIKI	33 ORFEOS ST.	683 00	DIDIMOTICHO	255 302 3143/ 255 302 3143	01-197
43	DELIVERY SERVICE DELIVERIES LTD	DELIVERY SERVICE LTD	20 MANOUSSOGIANNAKI ST.	546 21	THESSALONIKI	231 024 3062/ 231 024 3061	01-220
44	DERPANIS I. - LOTSIOS ST. O.E.	DERPANIS I. - LOTSIOS ST.	114 IOANNINON ST.	412 22	LARISSA	241 061 8077/ 241 028 3925	99-095
45	DHL INTERNATIONAL (HELLAS) COURIERS S.A	DHL INTERNATIONAL (HELLAS) S.A	44 ALIMOU AVE & 17 POMA ST.	174 55	ALIMOS	210 989 0851, 210 989 0000 / 210 988 6450	99-097
46	DIAKINISI LTD	QMS QUALITY MAIL SERVICE	42A V. IPIROU ST.	104 44	ATHENS	210 514 9752, 210 513 8026/ 210 513 0539	99-101
47	DIAKOUMIS DIMITRIOS	DIAKOUMIS DIMITRIOS	22 PAROU ST.	131 22	ILION	210 263 3833/ 210 263 3273	99-065
48	DIAKOUMIS SOTIRIOS	DIAKOUMIS SOTIRIOS	21 MIKONOU ST.	131 22	ILION	210 263 2595	99-066
49	DIGALAKIS MICHAIL	PELARGOS COURIER	44 PIRRAS ST.	117 45	N. KOSMOS	210 921 2227, 210 921 4141/ 210 921 2229	99-073
50	DIMITRIOS CHATZINOULAS & CO O.E.	CITY POST	103 - 105 KIPROU ST.	412 22	LARISSA	241 053 4544/ 241 053 4542	99-094
51	DIMOPOULOS TH. - TSELEPIDIS E. O.E.	QUICK & SAFE COURIER	THIRAS ST. & 22 VIRONOS ST.	164 51	ARGIROUPOLI	210 993 1058	01-211
52	DORDIOU DESPINA	NEA ATHINAIKI	10 ACHELOOU ST.	546 27	THESSALONIKI	231 055 4508/ 231 051 4121	02-060
53	DRAKOMATHIOULAKIS N. & CO O.E.	DRAKOMATHIOULAKIS N. & CO O.E.	168 ETHN. ANTISTASEOS ST.	713 06	HERAKLIO CRETE	281 033 3450/ 281 033 0009	02-071
54	DRAKOPOULOS ANTONIOS	DRAKOPOULOS ANTONIOS	20 AG. LOUKA SQ.	291 00	ZAKINTHOS	269 504 3636/ 296 504 3636	99-069
55	DROMEAS COURIER LTD.	DROMEAS COURIER LTD	6 IDIPODOS ST.	104 42	ATHENS	210 515 4130/ 210 515 4132	99-029
56	E. BEIKO & CO E.E.	SFERA EXPRESS -COURIER	123 SARANTAPOROU ST.	152 32	CHALANDRI	210 683 3304/ 210 683 3305	01-204
57	E. CHETZAKIS & CO O.E.	CHETZAKIS COURIER	15 DIMOKRATIAS AVE.	713 06	HERAKLIO CRETE	281 022 9869,-2/ 281 022 9881	01-212
58	EFSTATHIOU EVANGELIA	EFSTATHIOU EVANGELIA	45 PATRON ST.	201 00	KORINTHOS	274 102 8663/ 274 102 8663	01-271
59	ELTA COURIER S.A.	ELTA COURIER S.A.	40 D. GOUNARI ST.	153 43	AG. PARASKEVI	210 607 3000/ 210 607 3100	01-200



No	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	PC	CITY	TEL./FAX	REG. NO.
60	EURO COURIER S.A.	EUROCOURIER S.A.	95 THESSALONIKIS AVE.	143 42	N. FILADELFA	210 259 9000/ 210 259 9290	00-167
61	EURONET - COURIER AND LOGISTICS S.A.	EURONET - COURIER AND LOGISTICS S.A.	8 ASTROUS ST.	131 21	ILION	210 578 5750/ 210 578 5759	00-168
62	EXPRESS FLY LTD	EXPRESS FLY	43 I. PASSALIDI ST.	544 53	THESSALONIKI	231 094 3535, 231 092 4886/ 231 094 3615	99-003
63	FOKOS D. - LEONARDOU A. S.A.	FOKOS D. - LEONARDOU A. S.A.	2 GREVENON ST.	118 55	VOTANIKOS	210 346 1920/ 210 345 4584	99-086
64	FOROTZIDOU IOANNA	COMBUS COURIER - COURIER SERVICES	25 AG. DIMITRIOU ST.	562 24	EVOSMOS THESSALONIKIS	231 079 5240, 231 070 4702/ 231 070 4222	99-061
65	FRANTZOLIS I. DIMITRIOS	SAME-DAY COURIER	4 MIAOULI ST.	193 00	ASPROPIRGOS	210 557 8782/ 210 557 8784	01-260
66	FTEROTI IRIS UNITED COURIER NETWORKS LTD	FTEROTI IRIS	53 MARATHONO- MACHON ST.	104 41	ATHENS	210 512 7117, 210 512 7757	00-185
67	G. VOKOROKOS & CO O.E.	SPEED COURIERS	115-117 AKROPOLEOS ST.	172 34	DAFNI	210971 2720, 210 970 2788/ 210 976 0871	99-104
68	GENERAL EXPRESS LTD	GENERAL EXPRESS LTD	81 AG. VASILIOU ST.	173 43	AG: DIMITRIOS	210 973 2000/ 210 973 0060	02-050
69	GENERAL POSTAL COURIER S.A.	GENERAL POSTAL COURIER S.A.	15 DASKALOGIANNI ST.	144 52	METAMORFOSSI	210 284 2222/ 210 283 5210	99-149
70	GENOS CH.-SAMARA E. O.E.	GENOS CH.-SAMARA E. O.E.	2 D. ARGIROUDI ST.	661 00	DRAMA	252 102 6220	02-063
71	GEORGIAKOPOULOS GRIGORIOS	GEORGIAKOPOULOS GRIGORIOS	30 THEMISTOKLEOUS ST.	241 00	KALAMATA	272 109 5900/ 272 109 5900	99-030
72	GEORGITSIS KONSTANTINOS & CO E.E.	SAFE COURIER	8-10 N. FLOROU ST.	115 24	ATHENS	210 691 1241	99-138
73	GIANNAKOPOULOS GEORGIOS	GIANNAKOPOULOS GEORGIOS	3 DAMOFONTOS ST. & PSARON ST	241 00	KALAMATA	272 106 3390/ 272 106 2387	01-298
74	GIANNAKOPOULOU KALLIOPHI-STELLA	GIANNAKOPOULOU COURIER	17 TSAKALOF ST.	601 00	KATERINI	235 103 7575/ 235 107 7779	02-035
75	GIAOURAKIS NIKOLAOS	GIAOURAKIS NIKOLAOS	18 GIANNIKOU ST	712 01	HERAKLIO CRETE	281 028 6285, 281 028 9354/ 281 028 9354	99-036
76	GOLAS NIKOLAOS	I. D. S. COURIER	5 ANTISTHENOUS ST.	117 43	N. KOSMOS	210 921 7060, 210 921 7362/ 210 921 7514	99-043
77	GOLD MAIL COURIER S.A..	GOLD MAIL S.A.	26 THERMOPILOU ST.	173 43	AG. DIMITRIOS	210 975 5555/ 210 976 6623	01-206
78	GOLDEN ASSISTANT COURIER LTD	GOLDEN ASSISTANT LTD	45 26 th OCTOBER ST.	546 27	THESSALONIKI	231 050 2502/ 231 050 2501	02-076
79	GOLDEN COURIER HELLAS S.A.	GOLDEN COURIER HELLAS S.A.	8 EGALIO ST.	185 45	PIREAS	210 406 1130/ 210 406 1139	01-195
80	GOTSOPOULOS DIMITRIOS	G.M.T. (GENERAL MAIL TRANSPORTATION)	60 AG. OROUS ST.	151 23	MAROUSSI	210 681 7508/ 210 681 7508	01-295



No	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	PC	CITY	TEL./FAX	REG. NO.
81	GOUDIS NAOUM	GOUDIS NAOUM	3 AG. MINA ST.	521 00	KASTORIA	246 702 7138, 246 702 3525/ 246 702 7138	02-033
82	GRIGORIADIS GEORGIOS	GRIGO COURIER	10 KALAPOTHAKI ST.	546 24	THESSALONIKI	231 022 9689, 231 028 0919/ 231 022 8679	00-166
83	HELLENIC COURIER LINES LTD	FAST ACTION CO. LTD	116 AG. DIMITRIOU ST.	185 44	PIREAS	210 462 7032/ 210 462 8112	02-051
84	HELLENIC POST	ELTA	1 APELLOU ST.	101 88	ATHENS	210 335 3246, 210 335 3250/ 210 322 3595	99-150
85	I. KASSIOTIS & CO O.E.	SERVICENTER - SERVICES PROVISION CENTER	4C EL. VENIZELOU ST.	841 00	SYROS	228 108 6333/ 228 108 6333	02-040 02-041
86	IAKOVIDIS IOANNIS-ALEXANDROS	IAKOVIDIS IOANNIS-ALEXANDROS	6 DANGLI ST.	654 03	KAVALA	251 062 0640/ 251 023 3200	
87	IDP EXPRESS S.A. INTERNATIONAL DOCUMENTS & PARCELS TRANSPORTATION	IDP EXPRESS	51 A. SIMEONIDI ST.	546 38	THESSALONIKI	231 024 9241- 2/ 231 033 1290	99-145
88	INTER DELIVERY SERVICE LTD	I.D.S.	13 CHALKIDOS ST.	546 27	THESSALONIKI	231 052 5340/ 231 052 5340	01-193
89	INTERATTICA COURIER NETWORK S.A.	INTERATTICA S.A.	415 PANAGI TSALDARI ST.	176 75	KALLITHEA	210 940 7700/ 210 940 7680	99-136
90	INTERNATIONAL AIR TRANSPORTATIONS M.E.P.E.	I.A.B. M.E.P.E.	8 ILISSION ST.	157 71	ZOGRAFOU	210 778 3200/ 210 779 0496	99-123
91	INTERNATIONAL COURIER UNION S.A.	INTERMAIL S.A.	73-75 MAXIS ANALATOU ST.	117 45	ATHENS	210 901 9000/ 210 902 9755	99-115
92	INTERNATIONAL TRAFFIC COURIER LTD	INTERNATIONAL TRAFFIC COURIER LTD	22 AGIOU DIONISSIOU ST.	185 40	PIREAS	210 422 6624, 210 422 6071/ 210 413 3395	99-152
93	INTERPOST INTERNATIONAL TRANSPORTATION OF DOCUMENTS & PARCELS S.A.A.	INTERPOST S.A.A.	4 TH. IKONOMOU ST.	115 25	ATHENS	210 674 3300/ 210 674 3344	99-108
94	INTERPOST SERVICE LTD	INTERPOST SERVICE LTD	7 MAKEDONIKIS AMINIS ST.	546 31	THESSALONIKI	231 028 7721/ 231 028 7764	02-028
95	IOANNOU LEONIDAS & CO O.E.	COURIERS AT TOP SPEED	29 THOUKIDIDOU ST.	135 62	AG. ANARGIRI	210 238 8618, 210 232 1333/ 210 238 7778	00-179
96	K. KALIAKATSOS -D. VOLTIS O.E.	DUCK MAIL YOUR PERSONAL COURIER	58 PAPADA ST.	115 25	ATHENS	210 692 3111-18-19/ 210 698 2579	02-009
97	K. SARLIS - V. EFTHIMIOU O.E.	ELEVEN COURIER	8 KRATILOU ST.	104 42	ATHENS	210 515 4308/ 210 512 9668	01-214
98	K. TILLIRIDIS-A. MOYRATAI O.E.	G.S.C.	101 ALKAMENOUS ST.	104 46	ATHENS	210 881 3080	02-032
99	KABOURIS EMMANOUIL	IKAROS COURIER	53 ORFANIDOU ST.	111 42	ATHENS	210 213 3130, 210 213 3230/ 210 213 3250 210 512 9668	99-046



No	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	PC	CITY	TEL./FAX	REG. NO.
100	KALAFATIS EVANGELOS	KALAFATIS EVANGELOS	98 STAMATIOU PROIOU ST.	841 00	ERMOUPOLIS, SYROS	228 108 8898/ 228 108 8895	02-045
101	KALERGIS KON/NOS	KCS	69 AG. KOSMA ST.	452 21	IOANNINA	265 104 4200/ 265 104 4552	02-059
102	KANARIOU EVRIDIKI	CHIOS EXPRES COURIER	46 KOUNTOURIOTOU ST.	821 00	CHIOS	227 102 1369/ 227 104 4707	99-018
103	KANATSELIS DIMITRIOS	GRANDE EXPRESS COURIER	145 KOLOKOTRONI ST.	185 36	PIREAS	210 453 3633/ 210 418 6886	99-139
104	KANGA SERVICES COURIERS S.A.	KANGA SERVICES COURIERS	34 THESSALONIKIS ST.	143 42	N. FILADELFIA	210 252 5175/ 210 251 1115	99-102
105	KAPETANIOU FANI	KAPETANIOU FANI	1 FILELLINON ST.	212 00	ARGOS	275 106 3390	99-037
106	KAPRALOU CHRISTINA	MAY DAY COURIER SERVICES	123 ACH. PARASCHOU ST.	114 75	ATHENS	210 645 4174/ 210 642 4496	00-160
107	KARADIMOS DIMITRIOS	KARADIMOS DIMITRIOS	57 DIMOSTHENOUS ST.	413 36	LARISSA	241 028 6605/ 241 023 3238	01-201
108	KARAGIANNIS STILIANOS	KARAGIANNIS STILIANOS	2. TAR. ATHINAS ST.	851 00	RODOS	224 106 5639/ 224 106 6500	99-047
109	KARAMANOS PAVLOS	EXPRESS CITY SERVICES	14 DELIGIANNI ST.	106 83	ATHENS	210 821 9959/ 210 821 9217	
110	KARATSIOLIS EVANGELOS	KARATSIOLIS EVANGELOS	2 ROMANOU ST.	621 00	SERRES	232 105 3436/ 232 102 4416	99-071
111	KARAVAKOU ANGELIKI	PIRAIKI COURIER	76 ETOLIKOU ST.	185 45	PIREAS	210 462 9450/ 210 462 9430	99-057
112	KAREKLAS SOTIRIOS	KAREKLAS SOTIRIOS	11 KENTRIKIS ST.	591 00	VERIA	233 107 3680, 233 106 0490/ 233 107 3680	01-208
113	KIOULAFIS THEODOSIOS	KIOULAFIS THEODOSIOS	CHORA NAXOU	843 00	NAXOS	228 502 3965/ 228 502 3968	02-020
114	KIRIAKODIS I. - KONTOS E. O.E.	INTER CHIOS COURIER	7 SKANAVI ST.	821 00	CHIOS	227 108 1278/ 227 108 1278	01-221
115	KIRKOS PASCHALIS	KIRKOS PASCHALIS	2 KOMNINON ST.	621 00	SERRES	232 105 1115, 232 109 8378/ 232 105 1115	00-180
116	KLAPSA - GANTIRI OLGA	GANTIRI COURIER	SCHIMATARI	320 09	SCHIMATARI	226 205 9277/ 226 205 9277	01-225
117	KLAVDIANOS KESAR COURIER SERVICES	KLAVDIANOS KESAR COURIER SERVICES	5 KALVOU ST.	291 00	ZAKINTHOS	269 504 9222/ 269 504 9222	99-019
118	KLEANTHIS P. MANIATIS	KLEANTHIS P. MANIATIS	CHRISOMALLOUSSIS ST. & 17A IAKINTHOU ST.	811 00	MITILINI	225 104 3903, 225 104 2186/ 225 104 3903	00-170
119	KON. KRANITIS & CO O.E.	KRANITIS-COURIER	203 PALEAS KAVALAS ST.	121 36	PERISTERI	210 578 6679, 210 578 6689/ 210 578 6709	02-014
120	KONSTANTINIDIS DIMITRIOS	PIGASSOS EXPRESS COURIER SERVICES	14 DIOGENOUS ST.	544 53	K. TOUBA THESSALONIKI	231 090 0422-3/ 231 090 0423	01-224



No	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	PC	CITY	TEL./FAX	REG. NO.
121	KONSTANTINOPOULOU MARIA	KONSTANTINOPOULOU MARIA	350 KORINTHOU ST.	262 22	PATRA	261 031 2151/ 261 031 2151	99-052
122	KOSTAKOU ELENI	DAILY SERVICES	KLIDI	590 32	HMATHIA	231 054 0104/ 231 054 0104	02-067
123	KOSTAMIS CHRISTOS	KOSTAMIS CHRISTOS	36 KAPODISTRIOU ST.	431 00	KARDITSA	244 107 1941, 244 102 6676/ 244 107 1941	99-022
124	KOUFOPOULOU PANAGIOTA	KOUFOPOULOU PANAGIOTA	33 ER. STAVROU ST.	221 00	TRIPOLI	271 022 1991/ 271 022 1992	02-008
125	KOULOUVAKOS DIM. - DIMITRIOU CHRIS. O.E.	COCOONING DAYNIGHT COURIERS	14A MIRMIDONON ST.	121 33	PERISTERI	210 577 4970-2/ 210 577 7507	99-004
126	KOUNELIS NIKOLAOS	KOUNELIS NIKOLAOS	6 ROIDOU ST.	821 00	CHIOS	227 102 2550, 227 102 3769/ 227 104 3605	00-172
127	LABROUSSIS GEORGIOS	LABROUSSIS GEORGIOS GOLDAIR SUPER EXPRESS	10 KOUNGIOU ST.	452 21	IOANNINA	265 107 9105, 265 107 9115/ 265 107 9115	99-034
128	LADAS DIMITRIOS	LADAS DIMITRIOS COURIER SERVICES	23 CHR. SMIRNIS ST.	632 00	MOUDANIA CHALKIDIKI	237 302 2865, 237 302 4052/ 237 302 4644	99-042
129	LAMBROUSSIS BROS - K. SKARGIOTIS O.E.	LAMBROUSSIS BROS - K. SKARGIOTIS O.E.	155 DODONIS ST.	452 21	IOANNINA	265 104 5035, 265 104 9450/ 265 106 6144	01-223
130	LAVTZI CHRISTINA	LAVTZI CHRISTINA	11 ANDRIANOPOLEOS ST.	67100	XANTHI	254 106 8410/ 254 106 8410	02-069
131	LEVAKIS KOSTAS	LEVAKIS KOSTAS	12 MICHAEL VOGDOU ST.	671 00	XANTHI	254 106 4640/ 254 106 4544	01-196
132	M. KATSIMENIS - N. KEBERAS O.E.	HELLENIC AIR COURIER	22 FRAGKON ST.	546 25	THESSALONIKI	231 055 6076/ 231 055 6077	01-243
133	MAGIROPOULOS APOSTOLOS	EURO MAIL	8 DODEKANISSOU ST.	546 26	THESSALONIKI	231 025 3098, 231 054 0105	99-084
134	MAKKAS KONSTANTINOS	MAKKAS KONSTANTINOS	45 FRAGKOPOULOU ST.	115 25	ATHENS	210 672 8365-7	99-012
135	MAKRIPOULIAS KON/NOS	AGRINIO COURIER	28 ^o OCTOBER SQ.	301 00	AGRINIO	264 105 7419/ 264 105 5883	02-049
136	MALLIARAKI - MALIAROU ANNA	JET LINES COURIER	109 ALKIVIADOU ST.	104 46	ATHENS	210 881 5776-779/ 210 884 2131	99-059
137	MARKOS BIZAS COMMERCIAL TOURIST ENTERPRISES- CAR RENTALS S.A.	EUROCYCLADES S.A.	EKATONTAPYLIANIS SQ.	844 00	PARIKIA PAROU	228 402 1738/ 228 402 2146	02-037
138	MARNELAKIS P. & CO O.E.	ILIOS COURIER	1 VLASTON ST.	712 02	HERAKLIO CRETE	281 028 2549/ 281 028 2549	99-089
139	MARTSAKIS PANAGIOTIS	MARTSAKIS PANAGIOTIS	86 AN. GOGONI ST.	731 00	CHANIA	282 107 4551/ 282 107 4551	99-017
140	MASS COURIER- S.A.	MASS COURIER	119 STR. PAPAGOU ST.	173 41	AG. DIMITRIOS	210 970 3409/ 210 976 5375	01-301



No	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	PC	CITY	TEL./FAX	REG. NO.
141	MATARAGKA THEODORA	ON TIME COURIER	9 P. KALLIGA ST.	114 73	ATHENS	210 645 6831/ 210 642 4498	00-171
142	MAVILI ELENI	TACHYDROMEAS	49 FILIKIS ETERIAS ST.	54621	THESSALONIKI	231 022 3042/ 231 022 3042	02-054
143	MEDITERRANEAN COURIER LTD.	C.C. COURIER CENTER	265 IMITTOU ST.	116 31	ATHENS	210 751 7300/ 210 751 7022	99-127
144	MELENIKIOS ANTONIOS ANTONIOS EUROSEND	MELENIKIOS IOAN.	5 THESSALONIKIS ST.	621 00	SERRES	232 105 1887	99-031
145	MESSIMERTZIS KONSTANTINOS	TRIKALA EXPRESS MAIL	16 SOKRATOUS ST. & PLOUTONOS ST.	421 00	TRIKALA	243 103 3425, 243 107 6263/ 243 103 3425	99-007
146	METOCHIANAKIS ILIAS	APOLLO COURIER	4 TENEDOU ST.	713 06	HERAKLIO CRETE	281 022 1480	02-061
147	METROPOLITAN COURIERS LTD	METROPOLITAN COURIERS	1-3 AFRODITIS ST.	176 72	KALLITHEA	210 952 1747/ 210 952 5050	99-125
148	MIDEX LTD	MIDEX LTD	97 FOTOMARA ST.	117 45	ATHENS	210 921 2012/ 210 921 1681	00-187
149	MIGDOS S.- LASPAS P. & CO O.E.	TACHY-DROMEAS	71 THEAGENOUS CHARISSI ST.	546 39	THESSALONIKI	231 091 4088, 231 094 4116/ 231 093 0048	01-215
150	MORAITIS ANDREAS	MORAITIS ANDREAS COURIER SERVICES	84 CHAR. TRIKOUPH ST.	301 00	AGRINIO	264 105 8887/ 264 105 8887	02-043
151	MORAITIS ATHANASSIOS	QUICK POST SERVICES	68 DIMITRAKOPOULOU ST.	176 72	KALLITHEA	210 957 6840-1/ 210 957 1080	99-082
152	MOREAS KANELLOPOULOS - TRANSPORTATIONS & AGENCIES LTD	MOREAS	52 OTHONOS - AMALIAS ST.	262 21	PATRA	261 027 4560, 261 027 3523/ 261 022 5211	99-107
153	MOSCHOPOULOS IOANNIS	FIS COURIER SERVICES	9 KOSTI PALAMA ST.	141 22	N. HERAKLIO	210 283 5985, 210 283 4111/ 210 283 5085	99-002
154	MOULDIS NIKOLAOS & CO E.E.	AIOLOS COURIER SERVICE	1 KERAMEON ST. & 2 LENORMAN ST.	104 36	ATHENS	210 522 0039/ 210 522 0055	99-126
155	MOUSTAKAS GEORGIOS	MOUSTAKAS TRANSFER	24 KNOSSOU ST.	176 75	KALLITHEA	210 941 5820	01-202
156	MOUTSOU PANAGIOTA	LESVOS EXPRESS	50 AEROPOROU GENNARELOU ST.	811 00	MITILINI	225 104 6008, 225 104 5795/ 225 104 6008	01-269
157	NATSI ZOI	NATSI ZOI	3 MITROPOLEOS ST.	521 00	KASTORIA	246 702 3705/ 246 702 3705	02-016
158	NEOFOTISTOS XRISTOS	NEOFOTISTOS XRISTOS	8 PTOLEMEON ST.	661 00	DRAMA	252 102 6766/ 252 102 6766	01-290
159	NIKOLOPOULOU KOUTSOPOULOU CHARALABIA	NIKOLOPOULOU KOUTSOPOULOU CHARALABIA	7 ARCHIMIDOUS ST.	271 00	PIRGOS	262 103 1240/ 262 103 1240	01-249
160	NIKOS INGLESIS & CO E.E.	NIKOS INGLESIS & CO E.E.	1B NAVMACHIAS ELLIS ST.	264 41	PATRA	261 042 2102, 261 043 2560/ 261 043 4297	01-262



No	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	PC	CITY	TEL./FAX	REG. NO.
161	NTOULIAS ZACHARIAS	TACHIERGOS COURIER	20 ATH. DIAKOU ST.	157 72	ZOGRAFOU	210 775 1952/ 210 775 1952	99-063
162	NTROUBOGIANNIS ELEFThERIOS	NTROUBOGIANNIS ELEFThERIOS KANGA SERVICES	90 STOA ATH. DIAKOU	851 00	RODOS	224 103 7555/ 224103 6303	99-041
163	OFFICE SERVICE S.A.	OFFICE SERVICE S.A.	11 IOSIF ROGON ST.	117 43	ATHENS	210 924 7017/ 210 924 7608	00-155
164	OFFICE SERVICE ONE PERSON LTD	OFFICE EXPRESS	91 FILIPPOU ST.	546 35	THESSALONIKI	231 024 5071/ 231 024 5390	01-203
165	ORFANIDIS APOSTOLOS	GENESIS COURIER	26 KORITSAS ST.	173 42	ATHENS	210 996 6661/ 210 996 6661	99-033
166	ORFANOS DIMITRIOS	EURO POST COURIER SERVICES	51 MONASTIRIOU ST.	546 27	THESSALONIKI	231 054 7776/ 231 054 7776	99-010
167	P. MANEADIS - A. PLESSAS O.E.	ATHENS COURIER	41 ANDRITSENIS ST.	121 35	PERISTERI	210 572 5538/ 210 572 5538	01-210
168	P. PAPANIKOS - F. SIKARA O.E.	O ERMIS	1 EMONOS ST. & IRAKLEOUS ST.	322 00	THIVA	226 208 9210-1/ 226 208 9213	02-023
169	PAFIS KIRIAKOS	PAFIS KIRIAKOS	10 IOANNINON ST.	691 00	KOMOTINI	253 103 7424, 253 103 6466/ 253 108 1500	01-194
170	PAKO COURIER LTD	PAKO COURIER LTD	3 ATHAN. DIAKOU ST.	567 27	NEAPOLI THESSALONIKIS	231 053 5998, 231 053 5970/ 231 051 5443	99-154
171	PANAGIOTIDOU STAVROULA	PANAGIOTIDOU STAVROULA	6 AMERICANIKOU ERITHROU STAVROU ST.	652 01	KAVALA	251 023 2235/ 231 054 6238	02-073
172	PANOU ANDREAS	PANOU AIR SERVICE COURIER	2 ERMOU ST.	546 25	THESSALONIKI	231 054 6238/ 231 054 6238	99-027
173	PANTELOPOULOU ANASTASIA	PCI (POST COURIER INTERNATIONAL)	3 AGLAVROU ST.	117 42	ATHENS	210 924 0245/ 210 924 0332	99-072
174	PAPADATOS PANAGIOTIS	PCS	25 PATREOS ST.	262 21	PATRA	261 022 2992, 261 022 1857/ 261 062 0074	99-080
175	PAPADIMITRIOU EVAGELIA	QDS	6 KORAI ST.	152 33	CHALANDRI	210 682 2800/ 210 682 2884	00-178
176	PAPADOPOULOS D. & CO O.E.	DOVE COURIER SERVICES	10 SANTAROZA ST.	546 27	THESSALONIKI	231 051 3911-2	99-113
177	PAPANIKOLAOU PANAGIOTA	PAPANIKOLAOU PANAGIOTA	ARCH. MAKARIOU ST. & 1 METSOVOU ST	452 21	IOANNINA	265 104 4200/ 265 104 4552	02-064
178	PAPPA EVAGELIA	TACHIMETAFORES COURIER	21 IRINIS AVE.	481 00	PREVEZA	268 202 9521, 268 202 1277/ 268 202 1232	99-085
179	PARAPAREKIS SAVAS	DIAKINISSI EXPRESS COURIER	5 MILTIADOU ST.	152 32	CHALANDRI	210 682 6408/ 210 682 6778	00-173
180	PARASKAKIS MICHAIL	PARASKAKIS MICHAIL	24 GRIGORIOU E'. ST.	731 35	CHANIA	282 103 6001/ 282 103 8771	02-056
181	PERIVOLARIS GEORGIOS	PERIVOLARIS GEORGIOS	28 ADIMANTOU ST.	201 00	KORINTHOS	274 108 1855/ 274 102 9580	01-218



No	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	PC	CITY	TEL./FAX	REG. NO.
182	POLATIDIS GAVRIIL	POLATIDIS GAVRIIL	2 KARAIKAKI ST.	585 00	SKIDRA	238 108 2033/ 238 108 2038	99-068
183	POMONI A. MAVRA	ATTICA EXPRESS	95-97 ACHILEOS ST.	176 75	KALLITHEA	210 941 7340/ 210 941 5820	99-011
184	PONY EXPRESS GREECE LTD	PONY EXPRESS LTD	22 ILIOUPOLEOS AVE.	116 31	ATHENS	210 927 0700/ 210 927 0705	99-114
185	POPORI MARIA	PLANET COURIER	28 KAFKASOU ST. & ARGOSTOLIOU ST	113 63	ATHENS	210 822 6028/ 210 941 5820	01-293
186	POST & PRESS BUSINESS SERVICES LTD	P & P	7 OLIMPIADOS ST.	116 33	ATHENS	210 756 6011-3/ 210 756 2664	99-116
187	PRISMA SERVICE LTD	PRISMA SERVICE LTD	28 PINDAROU ST.	175 63	P. FALIRO	210 985 0474, 210 985 2660/ 210 983 5101	99-091
188	PROMOTION DISTRIBUTION SERVICES	P.D.S LTD	13 PROKLOU ST. & PROTAGORA ST.	116 35	ATHENS	210 701 7954, 210 701 7833/ 210 920 0409	99-148
189	PSARAKIS NIKOLAOS	PSARAKIS NIKOLAOS	8 TZANAKAKI ST.	731 34	CHANIA	282 105 6532, 282 104 2860/ 282 105 2954	99-049
190	PSARRAS SPIRIDON	PSARRAS SPIRIDON	32 EVANG. NAPOLEONTOS ST.	491 00	CORFU	266 104 5755	00-182
191	R.O. COURIERS LTD	R.O. LTD	17 ZICHNIS ST. & 23A EGIUO ST.	115 27	ATHENS	210 748 2211/ 210 775 1680	99-112
192	RACHOULI EVGENIA	RACHOULI EVGENIA	13 PLATONOS ST.	383 33	VOLOS	242 103 8612	99-147
193	RALLIS ANTONIOS	RALLIS ANTONIOS RT EXPRESS, EUROSEND, POSTO EXPRESS	30 DIKASTIRION ST.	681 00	ALEXANDROUPOLI	255 103 5566/ 255 103 5566	99-009
194	RANGOU MERITZANI	RANGOU COURIER	6 14 th SEPTEMBRIU ST.	581 00	GIANNITSA	238 202 5859/ 238 202 7672	00-156
195	RAPTIS ATHANASSIOS	RAPTIS ATHANASSIOS	294 KORINTHOU ST.	262 22	PATRA	261 033 7733/ 261 031 7830	99-081
196	RAZAFINTRAZAKA DIE - DONE	BLUE + CROSS	125-127 KIFISSIAS AVE.	115 24	ATHENS	210 699 8100/ 210 699 4455	00-190
197	RENTAS KONSTANTINOS	RENTAS KONSTANTINOS	18 NIOVIS ST.	212 00	ARGOS	275 102 0751, 275 102 2405	99-038
198	RIGANAS ALEXANDROS	RIGANAS ALEXANDROS	60 PALEOKASTRITSA N.R.	491 00	CORFU	266 104 7463/ 266 103 0175	99-035
199	RT EXPRESS - COURIER AND POSTAL TRANSPORTATIONS S.A.	R T-EXPRESS	1 POSIDONOS ST. & SOULIOU ST	173 42	AG. DIMITRIOS	210 994 5234/ 210 995 8643-4	99-105
200	S. XENODOCHIDIS & CO LTD	SALONICA MACEDONIA SERVICES	26 KOLETTI ST.	546 27	THESSALONIKI	231 055 0871-4/ 231 055 1387	01-242
201	SACHINIDOU SOFIA	CITYLINK COURIER	41 STR. GENNADIOU ST.	542 49	THESSALONIKI	231 032 0152/ 231 032 6748	99-070
202	SALONIKIDOU MARIA	PONY EXPRESS	100 GIANNITSON ST.	546 27	THESSALONIKI	231 020 0276/ 231 051 6809	02-044



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203	SARIDAKIS CHRISTOS	SARIDAKIS CHRISTOS	24 P. KELAIDI ST.	731 36	CHANIA	282 109 0089/ 282 109 0089	99-028
204	SECURITY COURIERS LTD	RADMAIL SECURITY COURIERS LTD	30 FARANTATON ST.	115 27	AMBELOKIPI	210 771 4965, 210 771 5208/ 210 771 5805	99-131
205	SERVANT COURIER LTD	SERVANT	74 KALLIRROIS ST.	117 41	ATHENS	210 924 1800/ 210 924 1800	99-100
206	SKARAKI SOUZANA - BEKRI NIKOLIA O.E.	TEAM COURIER SERVICE	27 METEORON ST.	116 31	AG. ARTEMIOS	210 756 4633/ 210 756 4638	99-129
207	SKOURTIS GEORGIOS	INTEREXPRESS	7 ANTONOPOULOU ST.	382 21	VOLOS	242 102 7204	99-015
208	SOLIDAKIS MICHAIL	EXPRESS POST HELLAS	62 SOLOMOU ST.	104 32	ATHENS	210 523 5152/ 210 522 1381	00-159
209	SOTOS PANAGIOTIS	SOTOS PANAGIOTIS	4 GRIGORIOU E' ST.	221 00	TRIPOLI	271 023 3839/ 271 023 3839	02-038
210	SOURLAS EVAGELOS	UNION MAIL	4G SOLONOS ST.	383 33	VOLOS	242 103 3785, 242 102 4370/ 242 103 2464	99-006
211	SPEED AIR INTERNATIONAL TRANSPORTATIONS LTD	SPEED AIR	18 TEGEAS ST.	164 52	AGRIROUPOLI	210 995 1024/ 210 994 0300	99-133
212	SPEEDEX COURIER S.A.	SPEEDEX	578A VOULIAGMENIS AVE.	164 52	ARGIROUPOLI	210 994 3400/ 210 340 7007	99-121
213	SPIRIDAKIS IOANNIS	SPIRIDAKIS IOANNIS	2 LACHANA ST. & MITSOTAKI ST	712 02	HERAKLIO CRETE	281 028 3285, 281 034 2160/ 281 034 2160	00-169
214	SPIROUPOLOS I. & CO E.E..	(PCI) POST COURIER INTERNATIONAL	16 RIGA FEREOU ST.	262 23	PATRA	261 024 1100, 261 062 3072/ 261 027 7480	01-226
215	STAMOULIS IOANNIS	MEDIA PLUS	22 ODISSOU ST.	115 25	ATHENS	210 691 6352/ 210 691 6359	02-065
216	STANTZOS DIMITRIOS	STANTZOS DIMITRIOS	34KARAGANNOPOULOU ST.	321 00	LIVADIA	226 108 7580, 226 108 7950/ 226 108 7951	01-299
217	STAREX GROUP ONE-PERSON LTD	STAREX GROUP LTD	43 MESSINIS ST.	165 61	ANO GLYFADA	210 962 4003/ 210 962 4000	02-079
218	STATHI POLIXENI	STATHI POLIXENI	75 KASSANDROU ST.	601 00	KATERINI	235 107 8200, 235 103 0000/ 235 107 8201	99-153
219	STATHOPOULOU D. & CO O.E.	ICC	19-21 MILON ST.	104 44	ATHENS	210 515 3896/ 210 512 9885	99-119
220	STAVRAKIS ANTONIOS	STAVRAKIS ANTONIS - EUROSEND COURIER	227-229 AL. IPSILANTOU ST.	262 22	PATRA	261 033 8123/ 261 033 7800	99-050
221	TAMBAKOPOULOS NIKOLAOS	TAMBAKOPOULOS NIKOLAOS	EM. PAPPAS ST. & VENIZELOU ST.	591 00	VERIA	233 102 3450	02-010
222	TASKOS ANASTASSIOS	TASKOS ANASTASSIOS	4 IP. GIAKA ST.	582 00	EDESSA	238 102 7963/ 238 105 1171	02-058



No	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	PC	CITY	TEL./FAX	REG. NO.
223	TASSIOPOULOS STAVROS	COYOTE SERVICES	240I.DROSSOPOULOU ST.	111 41	PATISSIA	210 201 9440/ 210 223 0186	02-055
224	TECHNICAL CLEANING FLASH S.A.	TECHNICAL CLEANING FLASH S.A.	225 MONASTIRIOU ST.	546 28	THESSALONIKI	231 055 5061-2/ 231 055 6187	99-087
225	TH. PAPADOPOULOU - E. GERAKITI O.E. LINE	EXPRESS TRANSPORTATION	40 KIMIS ST.	551 33	KALAMARIA	231 041 2053/ 231 041 9611	00-176
226	TNT SKYPACK HELLAS LTD	TNT SKYPACK HELLAS LTD	7 Z	167 77	ELLINIKO	210 894 0062/ 210 898 0945	99-110
227	TOBOULI LIGERI	GRAND EXPRESS COURIER	20 GIANNAKOPOULOU ST.	561 23	THESSALONIKI	231 074 9495, 231 073 0101	00-184
228	TRANSPORTATION COMPANY- WAREHOUSING-DISTRIBUTION-POSTAL SERVICES LTD.	IKAROS M.E.P.E.	7.5km NAOUSSA - VERIA RD	591 00	VERIA	233 109 3516-17/ 233 109 3518	01-209
229	TROPIOS ATHANASSIOS & CO E.E.	RUN MAIL	73 MANTINIAS ST.	542 48	THESSALONIKI	231 032 9790	01-270
230	TRUST MAIL COURIER LTD	TRUST MAIL LTD	19 KOROMILA AVE.	117 45	N. KOSMOS	210 924 2080 210 924 6637	99-134
231	TSABAS N. GEORGIOS	KINISSI EXPRESS	6 IPSILANTOU ST.	163 41	ILIOUPOLI	210 996 4084/ 210 996 4084	99-146
232	TSAKARDANOS G. - MARTINIS N. O.E.	SMART MAIL	60 AG. PARASKEVIS ST.	135 62	AG. ANARGIRI	210 262 1079, 210 262 1037/ 210 262 1079	00-183
233	TSANGOPOULOS SOTIRIOS	CASTOR EXPRESS COURIER	70 ATH.DIAKOU ST.	521 00	KASTORIA	246 708 3083/ 246 708 3083	99-039
234	TSARBOU EKATERINI	PACIFIC COURIER	21 ARISTODIMOU ST.	106 76	ATHENS	210 729 5136-7/ 210 729 5139	99-026
235	TSINTERI MARIA O.E.	REM TSINTERI O.E.N.S.C - NORTH SUBURB COURIER	26 KONSTANTI- NOUPOLEOS ST.	145 72	AGIOS STEFANOS	210 814 1720/ 210 622 9537	99-124
236	TSIORIS SPIRIDON	ATHENS COURIER	21 MEINTANI ST.	117 41	ATHENS	210 924 3240	01-272
237	TSITOTAS G. & CO O.E.	UNION MAIL	22 AERODROMIOU ST.	412 21	LARISSA	241 028 3565, 241 028 5490, 241 028 9233/ 241 028 3927	99-096
238	TSITSIMPIKOS VASSILIOS	TSITSIMPIKOS VASSILIOS	56 D. LAPPA ST.	431 00	KARDITSA	244 107 9400-2	02-017
239	TSOULOULIS AN. IOANNIS	TSOULOULIS AN. IOANNIS	4 K. PIITI ST.	650 01	KAVALA	251 023 2623/ 251 023 2623	99-051
240	TZIMI ATHINA	TZIMI ATHINA	55 ANAST. TAVOULARI ST.	291 00	ZAKINTHOS	269 502 9596/ 269 504 9307	02-011
241	U.D.F. COURIER LTD	U.D.F.	134 MEGALOU ALEXANDROU ST.	104 35	ATHENS	210 342 7400/ 210 342 7420	01-191
242	UNITED COURIER SERVICES LTD	UNITED COURIER SERVICES	SINGROU AVE. & 3 PINDOU ST.	177 78	KALLITHEA	210 953 7416-8/ 210 958 6115	01-297
243	UPS OF GREECE INC. S.A.	UPS	98A ALIMOU ST.	164 52	ARGIROUPOLI	210 998 4100 210 998 4199	99-120
244	UTA COURIER LTD.	UTA COURIER LTD	7 LITOUS ST.	546 28	THESSALONIKI	231 053 0607/ 231 053 0617	99-103
245	V. GIALARAKIS - D. DALEKOS O.E.	CHAMPION SPRINT	40 KIFISSOU ST.	143 10	N. FILADELFIA	210 251 5010	01-263



No	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	PC	CITY	TEL./FAX	REG. NO.
246	VAGIANOU EVGENIA	THELIMATA	55 AFRODITIS ST.	166 73	VOULA	210 899 6096-7/ 210 899 6048	02-015
247	VAGIAS CHRISTOS	VAGIAS CHRISTOS - EUROSEND	53A CHATZIARGIRI ST. - G. KARTALI ST.	380 01	VOLOS	242 103 8928/ 242 103 8928	99-013
248	VARDAKIS NIKOLAOS	VARDAKIS NIKOLAOS	GONIES KATHARADES AG. IOANNIS	722 00	IERAPETRA	284 202 6602/ 284 202 5151	02-078
249	VASILAKAKI ANASTASIA	VASILAKAKI ANASTASIA	60 IOAKIM KAVIRI ST.	681 00	ALEXANDROUPOLI	255 103 7879/ 255 103 8789	00-186
250	VELIMVASSAKIS STAVROS	VELIMVASSAKIS STAVROS	3 GAVRIIL ST.	721 00	AG. NIKOLAOS	284 108 2902/ 284 102 2871	01-198
251	VEVOPOULOS ALEXANDROS	IPIRO-TRANS- EPIRUS COURIER	38 ARCH. MAKARIOU ST.	452 21	IOANNINA	265 103 9777/ 265 103 9777	99-058
252	VLACHOS GEORGIOS	ATHENS COURIER	68 THIRAS ST.	188 21	KORIDALLOS	210 544 8847, 210 544 3774/ 210 544 8847	02-068
253	VOGINDROUKAS KONSTANTINOS & BROS O.E.	VOGINDROUKAS KONSTANTINOS & BROS O.E.	3 FILOTA ST.	621 22	SERRES	232 109 7717/ 232 109 7718	02-006
254	VOULGARI OURANIA	VOULGARI OURANIA DOCUMENTS AND ITEMS COURIER	20 KARAOLI DIMITRIOU ST.	546 30	THESSALONIKI	231 054 4847/ 231 054 4398	99-144
255	VRISSANAKI IRINI	VRISSANAKI IRINI	17 SMIRILIOU ST.	712 01	HERAKLIO CRETE	281 031 7570/ 281 025 3659	02-057
256	VRISSANAKIS MICH. EMMANOUIL	CRETA COURIER	16 GIAMALAKI ST.	712 02	HERAKLIO CRETE	281 028 1020, 281 028 2520/ 281 028 1020	99-079
257	WORLD COURIER (GREECE) LTD	WORLD COURIER (GREECE) LTD	37 KAPETAN CHRONA ST.	115 25	ATHENS	210 675 6517-9/ 210 675 6909	99-098
258	XIDIS NIKOLAOS	XIDIS NIKOLAOS	4 CHAINA AVE.	341 00	CHALKIDA	222 108 7587/ 222 107 8131	99-025
259	ZAFIRIS N. & CO O.E.	SWIFT MAIL	8 AMINTA ST. & PTOLEMEON ST.	116 35	ATHENS	210 725 6600, 210 723 9769/ 210 722 5963	99-141
260	ZANNETIS GEORGIOS	ZANNETIS GEORGIOS	87 CANADA ST.	851 00	RODOS	224 107 4229/ 224 107 4229	02-072
261	ZARKADA MARINA	ZARKADA MARINA	1 ST km GREVENA- KOZANI RD	511 00	GREVENA	246 208 3039	02-048
262	ZIRAS IOANNIS & CO O.E.	SPARROW TRANS	194 ATHINON ST.	241 00	KALAMATA	272 102 2266/ 272 109 0068	01-219
263	ZOUROUDI GEORGIA	ZOUROUDI GEORGIA	76 AP. PAVLOU ST.	851 00	RODOS	224 106 5142, 224 106 5832/ 224 106 5142	01-205



Appendix VI

Numbers Allocated under the National Numbering Plan

The table below shows the numbers under the National Numbering Plan which were allocated or reserved by 31 December 2003, for both fixed and mobile telephony networks:

Categories of Numbers Allocated/Reserved - Operators to Which Numbers were Allocated	Total Numbers Allocated by 31-12-2002	Total Numbers Reserved by 31-12-2002
Geographical Numbers ACN S.A., ALGONET S.A., EVERGY, FORTHNET S.A., GRAPES HELLAS S.A., INFO QUEST S.A., INTRACONNECT S.A., LANNET S.A., OTE, VIVODI TELECOMMUNICATIONS S.A.	23,029,000	577,000
Mobile and personal communications numbers COSMOTE S.A., INFO QUEST S.A., OTE, STET HELLAS S.A., VODAFONE-PANAFON	41,100,000	
Freephone numbers ALGONET S.A., FORTHNET S.A., INFO QUEST S.A., OTE, STET HELLAS S.A., VODAFONE-PANAFON	240,000	
Shared cost numbers ALGONET S.A., FORTHNET S.A., INFO QUEST S.A., OTE	230,000	
Personal numbers ALGONET S.A., FORTHNET S.A., INFO QUEST S.A., OTE	140,000	30,000
VPN numbers and corporate numbers ALGONET S.A., FORTHNET S.A., INFO QUEST S.A., OTE	130,000	
Numbers for accessing data networks ALGONET S.A., EVERGY, INFO QUEST S.A., OTE	1,040,000	10,000
Premium rate numbers for use by the general public COSMOTE S.A., FORTHNET S.A., OTE, STET HELLAS S.A., VODAFONE-PANAFON	260,000	10,000
Numbers for virtual calling cards ACN S.A., ALGONET S.A., ECONOPHONE, FORTHNET S.A., GRAPES HELLAS S.A., GREEK TELECOM, INFO QUEST S.A., LANNET S.A., OTE, SOUTHGATE COMMUNICATIONS HELLAS S.A., TELEDOME S.A., VIVODI TELECOMMUNICATIONS S.A.	113	20
3-digit Short Codes COSMOTE S.A., OTE, STET HELLAS S.A., VODAFONE-PANAFON	59	
4-digit Short Codes COSMOTE S.A., INFO QUEST S.A., OTE, TELEDOME S.A., STET HELLAS S.A., VODAFONE-PANAFON	241	
5-digit Short Codes COSMOTE S.A., EVERGY, INFO QUEST S.A., OTE, STET HELLAS S.A., VIVODI TELECOMMUNICATIONS S.A., VODAFONE-PANAFON	28	



In addition, the following Carrier Selection Codes had been allocated by 31 December 2002:

Carrier Selection Code	Telecommunications Operator
16200	SOUTHGATE COMMUNICATIONS HELLAS S.A.
16222	ECONOPHONE HELLAS S.A.
16234	INTRACONNECT S.A.
16244	GRAPES HELLAS S.A.
16262	NET ONE S.A.
16300	STARCOM S.A.
16333	TELEPASSPORT HELLAS S.A.
1733	ACN S.A.
1738	EVERGY
1750	VIVODI TELECOMMUNICATIONS S.A.
1751	ALGONET S.A.
1755	TELEDOME S.A.
1756	ECONOPHONE HELLAS S.A.
1757	COSMOLINE
1760	SOUTHGATE COMMUNICATIONS HELLAS S.A.
1765	INFO QUEST S.A.
1766	GREEK TELECOM S.A.
1769	IDEAL TELECOM S.A.
1777	OTE
1780	LANNET S.A.
1781	NET ONE S.A.
1787	TELEPASSPORT HELLAS S.A.
1788	GRAPES HELLAS S.A.
1789	FORTHNET S.A.



Finally, the following Carrier Pre-selection Prefixes had been allocated by 31 December 2002:

Carrier Pre-selection Prefix	Telecommunications Operator
16016	LANNET S.A.
16030	NET ONE S.A.
16032	FORTHNET S.A.
16038	EVERGY
16060	SOUTHGATE COMMUNICATIONS HELLAS S.A.

List of EETT Regulatory Decisions

EETT Decisions on Numbering - Domain Names	Content	Government Gazette (FEK)
254/70/2002	Regulation on the Introduction of Carrier Pre-selection in the Greek Market	FEK Issue 773/B/21-06-2002
254/71/2002	Regulation on the Introduction of Number Portability in the Greek Market	FEK Issue 791/B/26-06-2002
268/73/2002	Regulation on Management and Assignment of [.gr] Domain Names	FEK Issue 1617/B/31-12-2002



Appendix VII

Site Map of the EETT Website

EETT - Organisation		<ul style="list-style-type: none"> ▶ Greek Legislation - Regulatory Texts ▶ European Legislation - Regulatory Texts ▶ Postal Market Study-Survey ▶ EETT Announcements
<ul style="list-style-type: none"> ▶ What is EETT ▶ Structure ▶ Responsibilities 		Search <ul style="list-style-type: none"> ▶ Search
Telecommunications Market		News - Announcements <ul style="list-style-type: none"> ▶ News - Announcements
<ul style="list-style-type: none"> ▶ Licensing ▶ Numbering ▶ Wireless Communications ▶ Local Loop Unbundling (LLU) ▶ Regulatory Texts ▶ Interconnection ▶ Electronic Signatures ▶ Domain Names ▶ Universal Service ▶ Telecommunications Equipment ▶ Charges 		Links <ul style="list-style-type: none"> ▶ Links
Postal Services Market		Contact EETT <ul style="list-style-type: none"> ▶ Contact EETT
<ul style="list-style-type: none"> ▶ Registries of Postal Companies ▶ EETT Decisions regarding Postal Services Provision 		Publicity <ul style="list-style-type: none"> ▶ Press Releases ▶ Information Days - Events ▶ EETT Annual Reports ▶ EETT and CSF III
		Jobs <ul style="list-style-type: none"> ▶ Jobs
		Greek Version <ul style="list-style-type: none"> ▶ Greek version



Appendix VIII

List of Abbreviations

ADCO	Administrative Cooperation Group
ADSL	Asymmetric Digital Subscriber Line
AIA	Athens International Airport
APII	Aggregate Inferred Productivity Index
AOB	Athens Olympic Broadcasting
ASE	Athens Stock Exchange
AUTH	Aristotle University of Thessaloniki
BRA	Basic Rate Access
CB	Citizen Band
CD-ROM	Read-Only Memory stored on a Compact Disk
CEN	European Committee for Standardization
CEPT	Conférence Européenne des Postes et Télécommunications
CSF III	Third Community Support Framework
CSP	Certification Services Provider
COCOM	COmmunication COMmittee
DCS	Digital Command Signal
EC	European Community
ECC	Electronic Communication Committee
ECJ	European Court of Justice
EEC	European Economic Community
EET	National Telecommunications Commission (Greece)
EETT	National Telecommunications & Post Commission (Greece)
EGSM	Extended Global System for Mobile Communications
EITO	European Information Technology Observatory
EPAK	Unified Panhellenic Call Number
ERG	European Regulators Group
EU	European Union
FDC	Fully Distributed Cost



FEK	Official Government Gazette of the Hellenic Republic
FM	Frequency Management
FMS	Fixed Monitoring Stations
FORTH-ICS	Foundation for Research and Technology Hellas - Institute of Computer Science
FWA	Fixed Wireless Access
GDP	Gross Domestic Product
GRNET	Greek Research and Technology Network
GSM	Global System for Mobile Communications
IIAG	Informal International Affairs Group
IIG	Internet Informal Group
IIS	Integrated Information System
IPC	International Post Corporation
IRG	Independent Regulators Group
ISDN	Integrated Services Digital Network
ISP	Internet Service Provider
IT	Information Technology
ITU	International Telecommunication Union
ITU-R	International Telecommunication Union - Radiocommunications
LGA	Local Government Authority
LICCO	Licensing Committee
LLU	Local Loop Unbundling
LMDS	Local Multipoint Distribution System
LRAIC	Long-Run Average Incremental Cost
LRAIC-CC	Long-Run Average Incremental Cost using Current Cost as a costing base
MMS	Multimedia Message Service
MoU	Memorandum of Understanding
MTC	(Greek) Ministry of Transportation & Communications
NARA	National Administrations and Regulatory Authorities
NCC	National Control Centre
NFAT	National Frequency Allocation Table
NNP	National Numbering Plan



NRA	National Regulatory Authority
NRD-NP	National Reference Database on Number Portability
NRFR	National Radio Frequency Registry
NSMMS	National Spectrum Management and Monitoring System
OCS	Operational Costing System
OECD	Organisation for Economic Cooperation and Development
OJ	Official Journal
ONP	Open Network Provision
OPIS	Operational Programme "Information Society"
OTE	Greek Telecommunications Organisation
PD	Presidential Decree
PEAK	Unified Regional Panhellenic Call Number
PMR	Private Mobile Radio (Networks)
PPC	Public Power Corporation S.A.
PRA	Primary Rate Access
PSTN	Public Switched Telephone Network
RCC	Regional Control Centre
RE-TTE	Radio Equipment and Telecommunications Terminal Equipment
RIO	Reference Interconnection Offer
RR	Radio Regulation
SLA	Service Level Agreement
SMEs	Small and Medium Enterprises
SMP	Significant Market Power
SMS	Short Message Service
TCAM	Telecommunication Conformity Assessment and Market Surveillance Committee
TETRA	TErrestrial Trunked RAdio
UMTS	Universal Mobile Telecommunications System
US	Universal Service
USP	Universal Service Provider
VSAT	Very Small Aperture Terminals
WACC	Weighted Average Cost of Capital
WAP	Wireless Application Protocol
W-LAN	Wireless Local Area Network