

Annual Report



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Year of Quality Broadband



EETT

HELLENIC TELECOMMUNICATIONS & POST COMMISSION

Annual Report 2008

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Administration – Composition of EETT

The present Annual Report reports the activities of the Hellenic Telecommunications & Post Commission (EETT) for the period January 1-December 31, 2008. During that period, EETT's composition was the following:

Nikitas Alexandridis

President

Nikolaos Koulouris

Vice-President for the Electronic Communications Sector

Michael Sakkas

Vice-President for the Postal Services Sector

(21-04-2008 to 31-12-2008)

Member (01-01-2008 to 20-04-2008)

Thodoris Dravillas

Vice-President for the Postal Services Sector

(01-01-2008 to 08-01-2008)

Panagiotis Kottis

Member

Ioannis Paleologos

Member

Symeon Papavasileiou

Member

Panagiotis Tsanakas

Member

Georgios Tsaprounis

Member

Ioannis Papaioannou

Member (21-05-2008 to 31-12-2008)

Message of the President

By the end of 2007, the Greek broadband market was growing rapidly. Its rate of increase exceeded 100%, making our country's broadband market the fastest developing market worldwide.

However, to some extent, this rapid increase took the market operators, both the alternative ones and OTE, by surprise since they were not prepared to serve a demand that was constantly growing. Consequently, customer care, technical support, and, broadly speaking, the quality of the provided services were below standard, causing consumers much dissatisfaction and resulting in a large number of formal complaints. EETT, as the regulatory authority, was the recipient of the complaints lodged over problems and the dissatisfaction expressed by consumers who wished to be able to enjoy the benefits deriving from high speed rates and better Internet access. Thus, having acknowledged this problem and desiring, on the one hand, to prevent the situation from further exacerbating and, on the other, to ensure the provision of quality services to its consumers, EETT proceeded to take a series of related initiatives within its competence. It also flagged 2008 as «Year of Quality Broadband» aspiring at emphasizing the urgency in establishing quality broadband and the need to fully commit to this issue in order to benefit consumers.

The «Year of Quality Broadband» was served by EETT via a series of actions which either completed within 2008 or are still in progress and are expected to reach completion within 2009. Indicatively, albeit not restrictively, we mention the publication of the quality indicators; the issue of the Code of Practice for the provision of Electronic Communications services; the establishment of a Special Consumer Service Sector for Telecommunication services; and the issue of a guidebook containing information useful to consumers.

Nevertheless, we should point out that quality broadband is an ongoing goal whose achievement is not feasible within the course of just one year. The issue of having constant quality in the Electronic Communications services has become a permanent priority with the Regulatory Authority. By means of substantial interventions, strict monitoring of the market, and many information actions as well, EETT aspires in allowing consumers to choose, on the one hand, from a wide range of operators and innovative services at affordable prices via the growth of competition and, on the other, quality Electronic Communications services accompanied by a high level customer care.

Apart from the interventions implemented in the framework of the Year of Quality Broadband, EETT implemented further actions during 2008 in order to protect and safeguard consumer interests. More specifically, as of January 1, 2009, EETT decided to reduce mobile termination rates at a gradual pace with the reduction reaching 52% in the two-year period following that date; published the Code of Practice for the Multimedia Information Services; and amended the Carrier Pre-Selection Regulation clarifying important issues aiming at facilitating consumers. Last, within the framework of its publishing activity, it published information leaflets for the consumers and upgraded its website so that it may better serve its website visitors.

In 2008, the Broadband market continued on its course of growth which was mainly based on Local Loop Unbundling (LLU). Broadband growth for that year was marked by the increase in the broadband penetration rate to the population by 4.3 units, going from 9.1% to 13.4%. The LLU lines recorded a new increase exceeding 646,000 at the end of 2008 while the number of broadband connections at the end of December reached 1,506,614. Among the EETT actions that contributed to the increasing growth of the course of Broadband were the amendment of the Reference Unbundling Offer (RUO), the issue of the Collocation Regulation, and the implementation of a variety of information actions.

More specifically and with regard to its regulatory role, in 2008, EETT initiated the second round of market analysis and definition based on the new European Commission recommendation. At the same time, it proceeded with the issue pertinent to the regulations concerning Wholesale Line Rental (WLR) and Leased Lines. It also specified and regulated the implementation issues involved in the accounting separation obligation imposed on OTE for the individually defined Electronic Communications markets. Furthermore, with a view to promoting and safeguarding network and services competition, proceeded with the investigation into OTE's bundled packages; formal complaints regarding issues of LLU, Carrier Pre-Selection, and Number Portability; and imposed fines and other sanctions where applicable.

In the radiofrequency sector, in 2008, EETT focused on integrating the new responsibilities of operation in compliance with the new regulation framework governing digital television and the smooth transition into digital television broadcasting. Having been authorized under Law

3548/2007 to grant rights of use, mainly to television stations of national coverage, EETT issued a regulative provision for the procedure to be followed in the submission and examination of relevant requests. Furthermore, according to the provisions set by Law 3592/2006, EETT placed under Public Consultation a Regulation draft for the installation of equipment within antenna parks defined as such by the Joint Ministerial Decisions stipulated by Law. In the framework of its increased competences, EETT has proceeded to the regulation of issues arising during transmissions of radio-television stations and relating to the legality of those transmissions, the violation of technical characteristics, and mutual interferences as well as to the further imposition of administrative sanctions.

In the same sector, EETT implemented actions targeting the lifting of restrictions governing spectrum use and the development of broadband mobile services in our country while it persevered with exercising stringently its established responsibilities in spectrum licensing, monitoring, and management. Among its most important actions were the proposal submitted to the Ministry of Transport and Communications for a large number of modifications in the National Frequency Allocation Tables (NFAT) and the conduct of a Public Consultation regarding the lifting of technological restrictions in the rights of use for mobile telephony operating in the 900 and 1800 MHz zone.

In the Postal Services sector, the most important actions of EETT for 2008 were the conduct of a Public Consultation aiming at revising the Regulations of General Authorization/ Individual Licences as well as the issue of the Regulation for General Authorization. For the first time, the new Regulation determined the terms and the requirements governing the provision of Postal Services and relating to the protection of users; simplified the licensing procedures for the postal enterprises; and strengthened their operation flexibility. Furthermore, EETT's Postal Directorate conducted an annual Study for the registration of the quantitative and qualitative characteristics of the postal market which concluded that the growth rate of the liberated sector is double the respective growth rate of the Universal Service.

Last, in 2008, EETT's Postal Directorate intensified its regulatory activity aiming, on the one hand, at the smooth operation of the postal market within a competitive environment and, on the other, at the improvement of the services provided to consumers. In this context, a series of scheduled and

unscheduled audits were programmed and carried out. Those audits focused on registered and unregistered providers with EETT's Postal Registry aiming at ascertaining the soundness of their operation and at potentially taking certain measures towards their compliance with the Legislative Framework.

In 2008, EETT formulated for the first time five (5), key, strategic goals demanding action in the Electronic Communications and regarding the 2008-2011 period:

- 1) Encouragement of competition at the Service level.
- 2) Development of full competition at the Infrastructures level.
- 3) Improvement of spectrum availability and support of the creation of advanced infrastructure in wireless networks.
- 4) Making innovative services fully available to consumers.
- 5) Fully serving the benefits of consumers in terms of quality of service, availability of services, and information transparency.

However, taking into consideration the new responsibilities of EETT regarding radio-television issues as well as the new conditions that are taking shape within the Electronic Communications environment, we ought to add to the aforementioned key, strategic goals another one which is also extremely and equally important:

- 6) The formation of the appropriate regulatory framework for the promotion of the convergence between telecommunications, the Press, and the Media and its contribution to the transition to Digital Television.

With the initiated convergence of Electronic Communications with the electronic Press and Media, we nominated 2009 as the «Year of Broadband Convergence of Telecommunications with the Press and Media» while, at the same time, we have been scheduling the implementation of respective actions. In its capacity as the regulatory arm and the basic technical consultant of the State on issues regarding radiofrequencies, EETT is in possession of the relevant experience and statutory armoring to contribute actively to the effort of a methodical and efficient transition into the digital era.

Professor Nikitas Alexandridis
President of EETT
March 2009

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Introduction



Telecommunications Sector

The basic goal of EETT's strategy for the period 2008–2011 is the creation of a fully liberated and competitive Electronic Communications market based on a stable and foreseeable regulatory environment that will attract investments in broadband networks infrastructures and consequently will lead to the improvement in the quality of life for citizens and facilitate the development of innovative services, exportable over the Internet. The two basic keystones for the materialization of this specific strategy are the further development of Broadband throughout the Greek Territory and the protection of consumer rights.

In this context, EETT nominated 2008 as a year of «Quality Broadband» and carried out significant actions to this direction. Specifically, via the issue of the Code of Practice for the provision of Electronic Communications' services, EETT aims at resolving crucial issues / problems in the relationship between the consumer and the provider. Similarly, the issue of the Quality Indicators aims at the direct, easy and speedy access of consumers to information related to the quality of the provided Electronic Communications services. Furthermore, the amendment of the Reference Offer for Local Loop Unbundling (LLU) is expected to further facilitate the Collocation to OTE's Local Exchanges and the expansion of Broadband mainly in the Greek region. The development of the Geographical Information Systems (GIS) will benefit the Electronic Communications providers via the plotting of the infrastructures and the optic fiber networks and consumers via the information that they will be able to receive.

Within the framework of its regulatory role, EETT initiated the second round of definition and analysis of the markets of Electronic Communications products and services taking into consideration the new European Commission Recommendation. At the same time, it proceeded with the specification and the adjustment of the details related to the implementation of the accounting separation, which is an obligation imposed on OTE as the operator with Significant Market Power (SMP) in the majority of the Electronic Communications markets. The issue of the Regulations regarding the Wholesale Line Rental and the Leased Lines was of crucial importance in furthering market development.

Furthermore, EETT took actions towards the promotion and the sound operation of the competition in the Electronic Communications' networks and services. Under this scope, it examined OTE's economic and bundled packages while, at the same time, it imposed sanctions on providers for the infringement of the current legislation and the non-observance of the competition rules on issues regarding Carrier Pre-Selection and Number Portability. Moreover, for the first time in the chronicles of the Greek telecommunications market regulation, OTE's cost audit was completed within the first quarter of the audited year. At the same time, the Code of Practice for the Multimedia Information Service (MIS), which foresees a series of obligations on the part of MIS providers,

became effective. Last, EETT's decision on the new reduction in mobile and fixed telephony termination rates is expected to prove very important to and beneficial for consumers.

During 2008, EETT proceeded with actions that aimed at informing consumers about Electronic Communications services. In this context, it issued the Guide of the Informed Consumer and launched its website which was improved on the basis of providing better service to visitors / consumers. Last, EETT completed the Competition regarding the appointment of a Contractor, who will undertake the implementation of a multi-level information campaign for consumers regarding broadband services, wireless communications, consumer rights and alternatives provided to them.

Spectrum Sector

The year 2008 was the year during which the implementation of the regulatory framework in the spectrum sector reached its maturity. With the publication of all regulatory acts stipulated by Law 3431/2006, the Electronic Communications market had already began as of 2007 to function in an environment unencumbered by administrative restrictions and offering more alternative choices.

Moving towards the direction of removing the restrictions governing spectrum use, EETT proposed to the Ministry of Transport and Communications (MTC) a great deal of changes with regard to the National Frequency Allocation Table (NFAT). These changes were implemented in the aftermath of a Joint Ministerial Decision (JMD) by the Ministers of National Defence and Transport and Communications. Given the amended NFAT, EETT prepared a Regulation Draft for the terms of frequency use that is expected to receive approval within 2009 after the relevant Public Consultation. Consequently, a new environment is gradually being shaped in step with the European Community offering more freedom of choice regarding the provided services and the technologies implemented by the holders of rights of use. This environment is expected to favour market operation as it will lead to a more efficient use of spectrum and to more effective competition, ultimately benefiting consumers.

In a similar vein, during 2008, EETT conducted a Public Consultation for the removal of the technological restrictions in the rights of use for mobile telephony operating in the 900 and 1800 MHz band. The aforementioned rights stipulate the use of GSM technology only. Based on existing studies and due to the better diffusion characteristics mainly in the 900 MHz band, the removal of the above restriction with the possibility of implementing 3rd Generation (3G) technology will lead to the significant cost reduction in developing and operating 3rd Generation networks, something which will benefit both the market and consumers.

In the sector of TV frequencies and under the Law 3548,

EETT has been responsible for assigning rights of use mainly to national TV stations since 2007. In this context, it issued a regulatory provision for the procedure to be followed regarding the submission and consideration of relevant requests. For the implementation of this procedure and in collaboration with the National Council for Radio and Television (NCRTV), the technical characteristics of broadcasts of the national, regional and local stations legally operating were collected and imported in EETT's frequency database, generating for the first time a Frequencies' Registry of TV stations. After the completion of the above, the examination of the relevant requests by TV stations commenced.

Moreover, according to the provisions of Law 3592/2006, EETT placed under Public Consultation a Regulation Draft regarding the installation of equipment within the antenna parks defined as such by the Joint Ministerial Decisions (JMD) stipulated by Law.

In the framework of its increased responsibilities in the radio-TV spectrum, EETT now proceeds with the regulation of issues arising during broadcasts of radio-TV stations and relating to the legality of those specific broadcasts, violations in technical characteristics, mutual interferences. Additionally, EETT imposes administrative sanctions but not before the involved parties have been summoned to and heard at a relevant Hearing.

In 2008, EETT reached a Decision regarding a plan to expand its spectrum monitoring throughout the Region. The plan includes the creation of two regional offices in Patras and Iraklion, respectively, as well as the supply and installation of fixed and mobile monitoring stations. Implementation of this programming requires approval by the MTC as well as staffing the new offices with personnel. It should be mentioned that besides its headquarters in Athens, EETT also maintains an office in Thessalonica where it holds the exclusive responsibility of monitoring and controlling spectrum.

Moreover, EETT, in exhibiting the sensitivity that is due to the spectrum users residing in the areas struck by fire in 2007, amended the Regulation regarding spectrum use fees and reduced the latter by 80% for the three-year period following 2007 (2008-2010) in order to assist the businesses / holders of frequency rights of use based in the ravaged areas.

Last, as it is explicitly set out in the next paragraphs of this report, EETT has continued to exercise vigorously its established responsibilities regarding spectrum licensing, monitoring, and management.

Postal Service Sector

The conduct of a Public Consultation, aiming at revising the regulatory framework of General Authorizations and Individual Licenses, as well as the issue of the new General Authorizations Regulation were the two main actions of EETT's Postal Directorate, during 2008. The goal of the new

General Authorizations Regulation is, on the one hand, to boost the relatively slack domestic market (compared to the respective markets of the other member states of the European Union) and, on the other, to protect Postal Services users effectively. Boosting the market is being achieved through the simplification of the licensing procedures and the clarification of the requirements for handling direct mail. The direct mail market is expected to exhibit significant mobility in the future, something which will subsequently result in a substantial increase in the sector's revenues. Consumer protection is being achieved by incorporating "Terms and Conditions" in the Regulatory Framework governing provision of postal services, including provisions such as: pricelist publication, notification of the quality of services provided; clarification of the procedures for the deposit and delivery of postal items; definition of a dispute resolution procedure in cases of insufficient provision of postal services; appropriate use of the Express Delivery Voucher (EDV) in cases of group deliveries; clarification of the procedures for handling non-delivered postal items, determination of the content of the Charter of Obligations to Consumers (COC) and of the Individual Contract etc.

Furthermore, the content of the Universal Service (US), financing its cost (in the case that the service proves to be loss-making) as well as the classification of the provided services, constitute issues of crucial importance for the development of the market. As such, they were extensively discussed among the Public Consultation participants and are expected to be included in the new Regulation of Individual Licenses which is due in 2009.

In addition, the terms and conditions governing access to the Public Postal Network (PPN) by alternative postal operators, under General Authorization or Individual License, constitute one more crucial issue in market development. The determination of the interconnection points of the established private networks to the PPN and the economic terms governing these collaborations (wholesale prices), will be further clarified by the completion of the USP's cost-accounting system which is being developed under EETT's supervision. The operation of the cost-accounting system will ensure the cost-orientation of the US retail prices, making a wide range of postal services affordable for the consumers.

Putting past experience to good use, the audits, conducted in firms registered with EETT's Registry during 2008, aimed at ensuring that those firms operated in compliance with the General Authorization Regulation. Specifically, during those audits, the following matters were investigated: the proper operation of the Special Postal Items Track and Trace System (SPITTS); the existence of the formal requisites governing professional competence, the correct payment of annual fees; and the possibility of infringement of USP reserved area rights. In the framework of its regulatory role, EETT collaborated with other competent bodies (Chambers of Commerce, etc.) in order to eliminate illegal activities and locate those businesses that are providing postal services without the required General Authorization or Individual License.

At the same time, the recording of the quantitative and qualitative characteristics of the postal market indicated that the growth rate of the liberalized part of the market is twice the respective growth rate of the US.

National and International Collaborations

EETT's presence at the national, European, and international level, has been intensely visible through the development of bilateral cooperation and its active participation in official committees, working groups, and conferences.

At the national level and within the framework of its responsibilities, EETT widened and strengthened its cooperation with other Independent Administrative Authorities, public authorities, and citizen organizations. At the same time, it contributed to European developments by actively participating in the proceedings of: the European Regulators Group (ERG); the European Competition Network (ECN), the Postal Directive Committee (PDC); and other European Union (EU) Committees and working groups. Furthermore, it was the first time that the Plenary of the Comité Européenne de Réglementation Postale (CERP), hosted by EETT, was held in Athens.

In the framework of its international cooperation, EETT co-signed the memorandum of establishing the Independent Regulators Group (IRG) as a legal entity and showed a strong presence and participation in its proceedings. It also participated in the Summit for the signing of the foundation act of the Euro-Mediterranean ERG (EMERG), aiming at promoting cooperation in the Mediterranean. Last, in the context of bilateral contacts, EETT conveyed its know-how and experience to the National Regulatory Authorities (NRAs) of other countries. More specifically, it co-signed memoranda with the NRAs of Cyprus and India aiming at establishing relations of cooperation with those countries.

Other Actions

In 2008, EETT continued its actions towards the improvement of its internal organization and operation. To this end, the National Authority carried on with its efforts to meet its needs in human resources and promoted actions which, on the one hand, entailed the training of employees and, on the other, sought to guarantee the safety and health protection of its employees.

In 2008, EETT continued implementing those of its projects that had been included in the Operational Programme "Information Society" (OPIS) of the 3rd Community Support Framework (CSF III). Within the year, the Integrated Information System (IIS), a project of strategic importance whose implementation had begun as early as 2006, became operable. As of the very first months of productive operation, the IIS showed remarkable benefits whose quality, with regard to the operation, efficiency, and services provided by the Regulatory Authority, could be measured.



1. The Consumer in the Centre of Developments



The protection of consumers from unfair practices and a constant flow of information constitute the basic keystones of EETT's operation. To this purpose, EETT established the Consumer Service Sector for Telecommunication Services (CSSTS) and proceeded to take certain actions, such as the reduction in termination rates, the publication of the quality indicators, and the issue of the Code of Practice for the Electronic Communications services that significantly benefited consumers. Last, it conducted a series of actions that provided consumers with information regarding subjects of great interest to them.

1.1.Care for the Consumer

In January 2009, EETT established the CSSTS which is a special team for assessing the complaints filed by the consumers using telecommunication services and aiming at detecting those issues that demand the mobilization of its auditing mechanism. The CSSTS has the following responsibilities:

- Consumer care and information over the telephone.
- Management and assessment of the written complaints.
- Forwarding the complaint received by EETT to the accused provider on the very same day of receipt.
- Coordinating and communicating with the Authorities also responsible for consumer care in Greece and Europe.
- Participation in regulatory texts aiming at improving EETT's Regulations and Decisions.
- Participation in meetings with the respective European Authorities for the introduction of the Regulations and practices in the Greek market of Electronic Communications.
- Daily monitoring and registration of bad practices exercised by telecommunication companies as well as the infringement of the relevant Legislation and Regulation in order to take Measures and make Decisions.

- Production of monthly reports and statistical data regarding market development and its problems.

With regard to the management of the written complaints, it should be noted that EETT uses them in order to:

- Detect issues which call for its regulatory intervention for the more effective operation of the market and proceed to Consultations and the drafting or the amendment of Regulatory provisions.
- Proceed with monitoring audits of telecommunications companies in order to detect possible infringements of the telecommunications legislation.
- Hold Hearings for telecommunications companies where infringements have been detected and impose fines or Recommendations on the companies.
- Plan information actions on issues that interest consumers directly.

The complaints lodged against telecommunications services and received by the CSSTS comprise 89% of the written complaints received by EETT given that 6% relates to complaints about the radiofrequency spectrum, 4% relates to requests of general interest, and only 1% involves complaints related to Postal Services (Table 1).

Table 1
Classification of Written Complaints, 2004 - 2008

CATEGORY	2004 (%)	2005 (%)	2006 (%)	2007 (%)	2008 (%)
RADIOFREQUENCY SPECTRUM (antennas and interferences)	54	36	17	6	6
TELECOMMUNICATION SERVICES	36	57	76	90	89
Internet (availability of services and tariffs)	7	11	21	10	10
Mobile Telephony (availability of services, quality and tariffs)	10	5	6	3	4
Fixed Telephony (availability of services, quality and tariffs)	18	40	48	77	75
Domain Names [.gr]	1	1	1	0	0
POSTAL SERVICES	2	1	1	1	1
GENERAL INFORMATION	8	6	6	3	4

As far as the radiofrequency spectrum is concerned, the requests / complaints received by the Spectrum Directorate related to the licensing of mobile telephony antennas and cases of interferences. In the Postal Services sector, the Postal Services Directorate of EETT in 2008 handled 167 complaints successfully, 60% out of which related to defective provision of postal services by the Universal Service Provider (USP).

The entire picture of the Telecommunications market based on the registered complaints of the CSSTS is shown in Figure 1, which demonstrates that the complaints for 2008 show a tendency to decrease and have been stabilizing at an average

of 1,100 per month. In a market where there are 14 million active mobile telephony connections, 5.3 million fixed telephony lines in operation, and 640,000 connections to alternative providers (LLU), the total number of the annual complaints regarding Telecommunications Services decreased by 22% in 2008 (from 16,763 in 2007 to 13,088 in 2008).

In 2008, 62% of the complaints regarding Telecommunications Services related to Local Loop issues (e.g. damages, cancellations of connections, delays in activations, etc.) and 28% related to other fixed telephony issues (e.g. Carrier Pre-Selection, disputed bills).

Figure 1
Monthly Progress of the Total Number of Complaints for the Telecommunications Services, 2007 - 2008

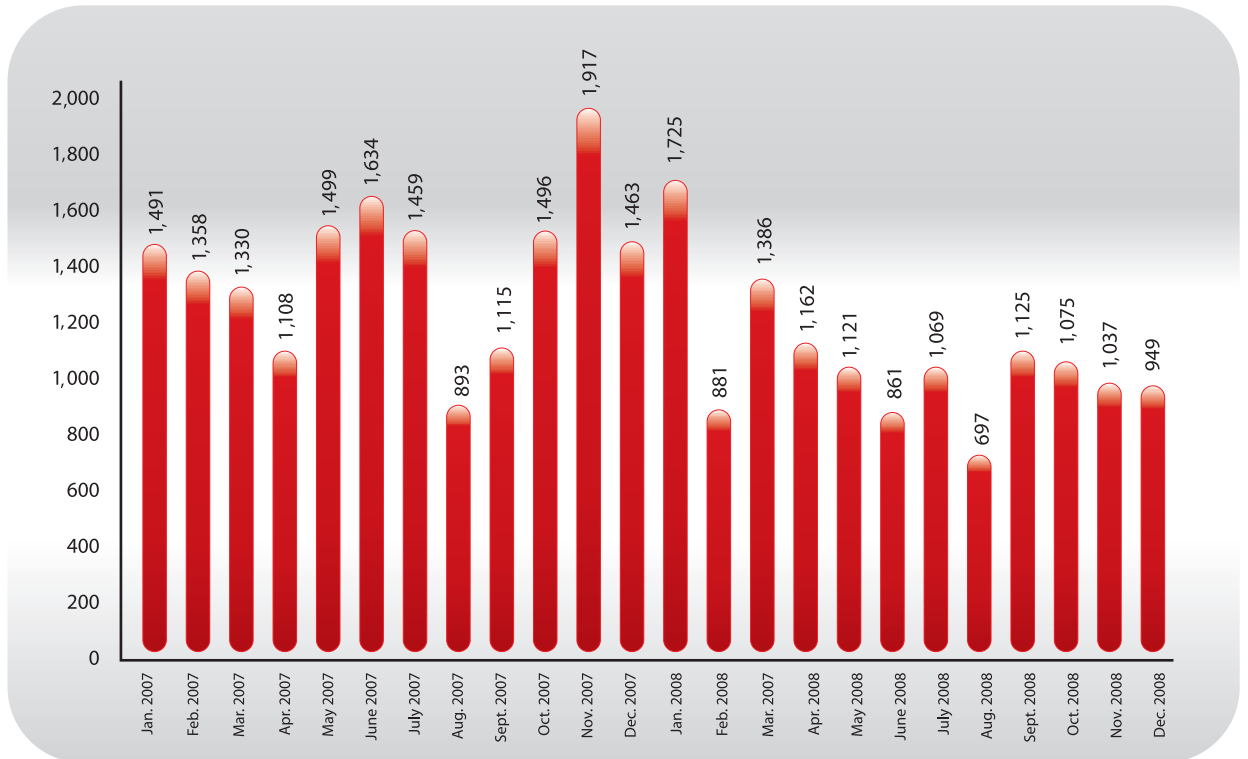
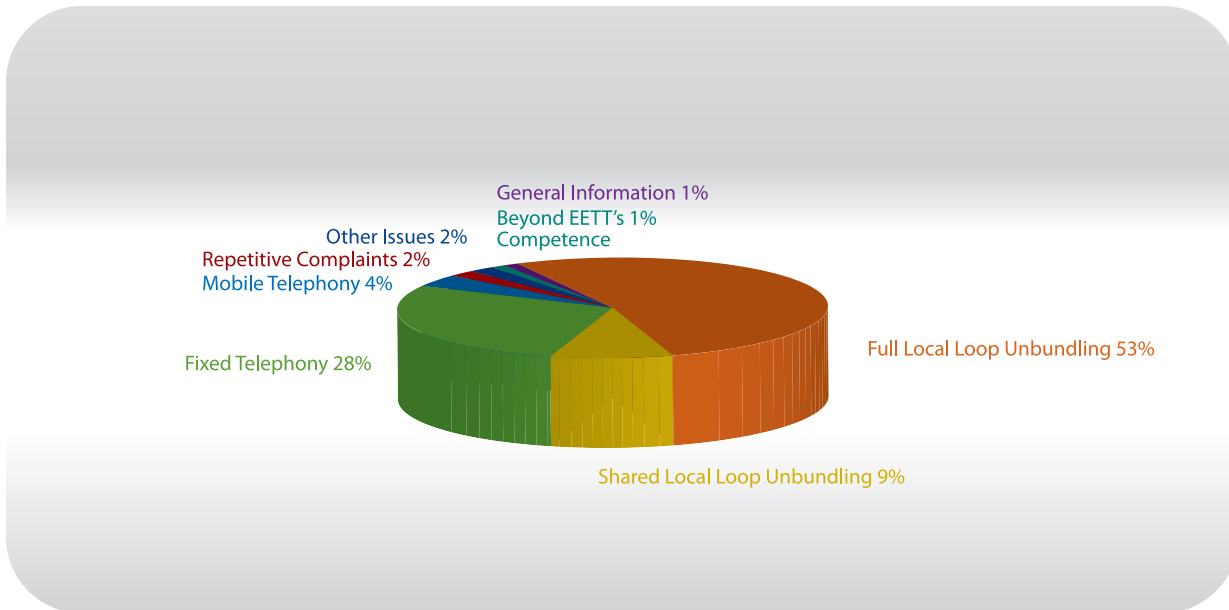


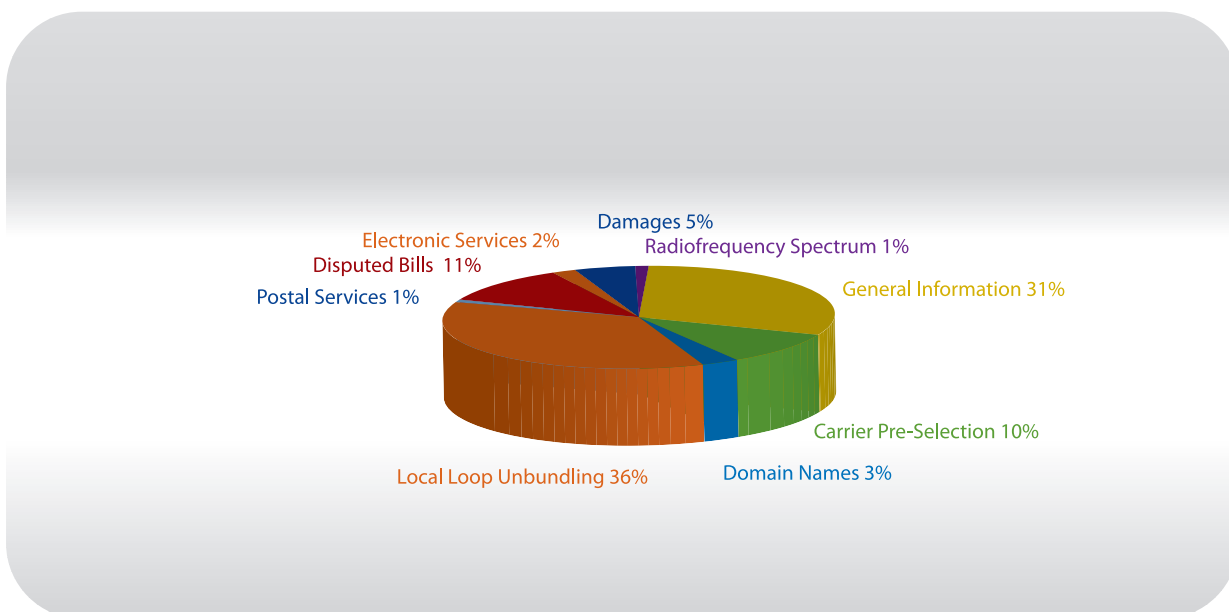
Figure 2
Classification of the Telecommunications-Related Complaints per Category (2008)



Additionally, during 2008, EETT received 21,829 phone requests / complaints made by consumers registering a 41% decrease compared to 2007 and mainly focused on LLU issues, Carrier Pre-Selection, disputed bills, damages, quality

and availability of specific services of telecommunication and postal companies, licensing of mobile telephony antennas, and cases of interference. The classification of telephone calls by subject is shown in the following Figure 3.

Figure 3
Classification of Consumer Calls (%) from 01-01-2008 to 31-12-2008



1.2. Interventions to Benefit Consumers

The protection of consumer rights along with the provision of quality and innovative services were the focal point of EETT's actions during 2008 and were flagged as the basic keystones of its strategy for the two-year period 2009-2011. EETT's interventions in the interests of consumers were either direct (e.g. tariffs reduction) or indirect via the shaping of a competitive environment at the infrastructures level as well as at the services level. Analytically, EETT's actions for the protection and the safeguarding of consumer interests have been the following:

Reduction in Telephony Rates

EETT's decision for the gradual reduction of the mobile termination rates as of January 1, 2009 will bring about reductions of up to 52% for the next two years, a fact that is expected to reduce the prices for calls to mobile telephones.

At the same time, EETT proceeded to mark down the target price for the termination rates on fixed telephony networks for 2009 from 0.01131 euro/minute to 0.00892 euro/minute. This reduction of 27% approximately is expected to lead to a further decrease in the retail tariffs paid by subscribers to OTE or other alternative operators when they call subscribers of other alternative providers.

As far as the International Roaming rates are concerned, the upper ceiling for the wholesale and retail tariffs for the phone calls of the Eurotariff¹ was further reduced. Last, the European Commission accepted the three-year extension (ending July 2013) for the regulation of the phone telephony tariffs and is looking at initiating the regulation of Roaming rates on Short Message Services (SMS) and on data services.

Code of Practice for the Provision of Electronic Communications Services

The Code of Practice determines the procedures that must be abided by in every step of the collaboration between the operators and the consumers before and during their contractual relationship. Essentially, the Code aims at protecting the consumer since it sets rules and recommendations that regulate issues such as:

- The valid, complete and effective information disseminated to consumers regarding the provided service.
- Safeguarding the consumer over issues of contracting / ending a contract.
- Keeping the consumer informed in a constant and timely manner of the activation of the service and the delays.

- Keeping the consumer informed on the quality of services issues.
- The promotion of transparency when informing consumers about all charges connected with the service.
- Offering consumers the services of specialized personnel.

At the same time, the Code provides for the consumer's right to examine and test new services and different operators based on his/her own interest.

Code of Practice for the Provision of Multimedia Information Services

This specific Code set the rules for the Multimedia Information Services (MIS)² including those that are being provided over the Internet but not their content. The Code emphasizes on providing complete and clear information to consumers while regulating at the same time issues targeting the protection of users from illegal dialers.

Within the framework of the Code, the MIS providers are obligated among other things to have a Help Line at no additional charge and to publish a table with the provided MIS accompanied by the respective price list. Additionally, they must inform the consumers about the charges involved in the advertised MIS.

In the context of its responsibility and after examining complaints relating to MIS, EETT addressed a Recommendation to consumers urging them to pay close attention when using MIS and enabling them to gain a complete insight into MIS prior to using it.

Quality Indicators for the Electronic Communications Services

EETT posted on its website comparative tables regarding the quality indicators of Electronic Communications services, a step that was important towards improving the quality of those services. Quality indicators aim at the instant, speedy, and easy access of the end-users to information related to the quality of the provided Electronic Communications services. Use of these indicators enables consumers to carry out market research prior to selecting the service and/or the provider they wish for, thus making the most advantageous choices.

1. It is noted that the Eurotariff is a maximum price limit regarding International Roaming charges for calls made and received within the 27 member states of the European Union.

2. Audiotext services, Videotext services, Premium Short Message Services (PSMS), Premium Multimedia Messaging Services (PMMS).

Amendment of the Carrier Pre-Selection Regulation

The amendment of the Carrier Pre-Selection Regulation clarified crucial issues for the facilitation and the safeguarding of consumers such as the duration of the contractual relationship between the consumer and pre-selected provider. According to relevant complaints, many consumers, even after having cancelled their Carrier Pre-Selection, continued to receive bills containing fixed charges from the cancelled pre-selected provider. By the relevant amendment of the Carrier Pre-Selection Regulation, when the pre-selected provider changes then its contractual relationship with the consumer is terminated ipso jure as far as the provision of telephony services via Carrier Pre-Selection and/or Selection is concerned, as long as those telephony services are provided at a monthly rental. The contractual relationship can continue to exist via Carrier Selection, if the latter is provided without a monthly rental.

At the same time, for the further protection of the consumer, a relevant clause was added in the Regulation. According to that clause, during the submission of a Carrier Pre-Selection request over the telephone, the provider is also obligated to record, among other things, the minimum data necessary for a distance contract to become valid³.

Amendment of the Reference Unbundling Offer (RUO)

In the light of safeguarding the quality of the provided telecommunication services, EETT decided to amend the Reference Offer for the LLU, by introducing procedures that will facilitate the prompter service of consumers' requests for broadband connections as well as the prompter damage compensation (e.g. introduction of the imaginary number, upgrading the information system for the management of requests and damages, etc.).

The Collocation Regulation

The issue of the Collocation Regulation has significant benefits for both the public and the providers such as: a reduction in the environmental surcharge and public inconvenience from the infrastructure works; the capability of more providers having access to services; time savings; and a reduction in the expenditure entailed in the development of infrastructures.

Cooperation with other Official Institutions active in Consumer Issues

During 2008 and within the framework of its actions for providing consumers with better services, EETT established close cooperation with the Authorities jointly responsible for consumer issues, institutions, and consumer organizations.

In the framework of this cooperation and after an initiative taken by EETT, a meeting of the parties involved took place. The agenda of the meeting involved the basic problems that the consumers of Electronic Communications face and the context of responsibilities for each party involved. The goal is to keep consumers inform and guide them over the specific steps that they must follow as well as the Authority they must address themselves to in case they encounter problems with an Electronic Communications provider.

The meeting concluded with proposals made by consumer organizations to all the parties involved which, inter alia, related to the prompter resolution of complaints, the possibility of consumers being able to follow up directly the progress of their complaint, and the improvement in the terms of contracts between providers and consumers.

Number Assignment for Social Purposes

The numbering area starting with «116» is bound by the National Numbering Plans (NNP) for coordinated numbers relating to services of social interest. In this context, EETT had already assigned within 2007 the short code 116000 to a competent institution following its relevant request for an open-telephone line on which reports concerning missing children could be submitted.

Furthermore, the short code 116111 was assigned by EETT to another competent authority for the operation of a telephone line that would provide assisting services to children in need of care and protection, channeling them to the appropriate services and relief resources.

It should be noted that the list of the bounded numbers that relate to coordinated services of social interest includes 116123, a number which is available for assignment by EETT to a telephone line offering direct help to individuals in need of emotional support.

Protection Measures for the Consumers of Postal Services

The new General Authorization Regulation for the provision of Courier Services determined for the first time the conditions and the requirements governing the provision of postal services relating to the protection of users. The innovation introduced by the new Regulation relates to the procedures involved in the examination of the complaints filed by postal services users. These procedures which ought to be fast and simple, describe the stages for the resolution of disputes in cases of defective postal service (e.g. delay, damage, loss or any other breach of the contractual obligations of the provider during the provision of the service). Initially, an amicable settlement is attempted via written communication

3. According to Law 2251/1994 «Protection of Consumers».

among the user and the provider, within the context of the current legislation. If the former case fails, then the user can request from the defendant company that a Dispute Resolution Committee (DRC) converge. The Committee consists of the provider's executives and of a representative from a consumer organization while the plaintiff is entitled to attend the DRC meetings in person or via his/her written memorandum. The place where and the time when the DRC will converge is the responsibility of the defendant provider. In the case that the procedure of finding a solution via the DRC proves unsuccessful, the user is entitled to addressing himself/herself to EETT which will then settle the dispute in the context of its competence. It should be noted that the consumer is entitled to addressing himself/herself to other competent authorities or even appeal to Justice so that he/she may have his/her issue settled.

The new General Authorization Regulation makes special reference to the management of the undelivered items. Specifically, if the delivery of the item to the recipient (including any repeated efforts) is not possible or the recipient refuses to receive the item, then the provider returns the item to the sender at a charge of no more than the amount paid for its dispatch. In the event that the return of the item to the sender is unsuccessful, the item is retained for at least 6 months on the provider's premises and after that is being destroyed.

Further to the Regulation and especially in the case of the Charter of Obligations to Consumers (COC), EETT submitted to the USP proposals for amendment of the current COC aiming at clarifying the characteristics of the provided services, enriching the current procedures governing disputes resolution and fully informing the users of postal services about Universal Service (US) issues.

Finally, the USP, after EETT's recommendation, amended the contracts it had signed with its big clients so that the contracts may comply with the Competition Law.

1.3. Information Actions

The Guide of the Informed Consumer for the Electronic Communications Services

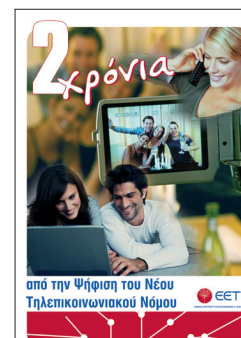
In the framework of its publishing activity and due to the immediate need by consumers for information about the new possibilities that are available to them, EETT published

the Guide⁴ of the Informed Consumer for the Electronic Communications Services, which gives answers to consumers' frequently asked questions, entails useful information about their rights, and describes the obligations the companies have towards consumers. Furthermore, it guides consumers on how to file a complaint.



Information Leaflet «2 Years since the Enactment of the New Telecommunications Law»

On the occasion of 2 years having elapsed since the enactment of the new Law on Electronic Communications, EETT issued an information leaflet⁵, which presents the developments in the telecommunication sector as well as the 10 most important benefits for consumers. Those benefits include the price reduction, the rapid growth of LLU, the public's familiarization with Broadband, the sky-rocketing increase of the Internet access speeds and the ability to select among providers and innovative services.



Leaflet for the Postal Services

In the context of informing the public on postal services, EETT published an information leaflet⁶ containing useful information about the Postal Services. The leaflet, titled «Postal Services: Information is Everything», aims at informing consumers about the available Postal Services, the possibilities that are offered to them, and their rights as consumers. Furthermore, the leaflet focuses on the COC, which is a formal list of the obligations that the Hellenic Post (ELTA) as well as the other postal companies have towards consumers and entails the specifications under which they operate.



4. The Guide is available at EETT's website: http://www.eett.gr/opencms/opencms/admin/downloads/Informative_Documentation/Odigos_145x230.pdf.

5. The leaflet is available at EETT's website: http://www.eett.gr/opencms/opencms/admin/downloads/Informative_Documentation/EPETEIAKO_FORWEB.pdf.

6. The leaflet is available at EETT's website: http://www.eett.gr/opencms/opencms/admin/downloads/Informative_Documentation/EETT_mockup_170108.pdf.

The Upgrade of the EETT Website

In September 2008, EETT launched its website which, in terms of operation, themes, and design, had been improved, aiming at better serving the website's visitors—consumers and facilitating them in their search for information. In this context, a special unit which gathers together all the information that may interest consumers, was created: the procedure involved in filing a query/complaint with EETT; the steps that consumers must follow for the resolution of any problems they may be facing; issues that consumers may have and whether these issues fall under EETT jurisdiction, etc. The new possibilities and services provided by the new website are the following:

1. Instant information via RSS.
2. Multimedia services (video).
3. Accessibility facilities for people with special needs.



Information Strategy and Implementation of an Action Plan for the Broad Public

During 2008, EETT conducted an international, open competition in order to entrust the project «Planning of an Information Strategy for the Broad Public and Implementation of the Action Plan» to the appropriate contractor. The competition concluded in December 2008 and the contract with the awarded Contractor was signed. The first information actions are scheduled for the first quarter of 2009.

Via the implementation of this specific information campaign, EETT aims at informing the broad public about crucial issues of the Electronic Communications and Postal Services markets. The basic thematic units of the project are the following:

- Familiarizing the public with and spreading the broadband Internet.
- Providing scientific information on issues regarding mobile telephony antennas and the rational use of mobile telephones.
- Informing the public about its rights and obligations in the markets of Electronic Communications and Postal Services as well as the possibilities of choices at its disposal.



2. Actions for Broadband Development Year of Quality Broadband



With a view to safeguarding the provision of quality broadband services to consumers, EETT undertook a series of initiatives, in the context of its competence. Aspiring to emphasize the urgent nature of this issue and the need for a general commitment for the consumer's benefit, it nominated 2008 as «Year of Quality Broadband».

EETT's regulatory interventions, such as the amendment of the Reference Offer for Local Loop Unbundling (LLU) and the Collocation Regulation contributed considerably to approaching the goal of «Quality Broadband». Furthermore, the issues of the Code of Practice and of the Quality Indicators for the provision of Electronic Communications services played a significant role in keeping consumers informed and protecting their rights. At the same time, via a series of information actions, EETT sought to inform consumers about the advantages and the significance of Broadband.

Taking into consideration that Broadband is a social good that every citizen deserves to enjoy; EETT will continue its actions for the rapid growth of Broadband and its expansion everywhere and for everyone.

2.1. The Progress of Broadband in Greece

The convergence course of Greece with the other European countries regarding broadband penetration persisted throughout 2008. At the end of the year the broadband connections exceeded 1,500,000, compared to 1,017,475 at the end of 2007. According to COCOM's Report on Broadband progress in Europe, for the period 30 June 2007 to 30 June 2008, Greece registered the sixth highest increase in broadband penetration with 4.3 lines per 100 residents. The respective European average for the same period was 3.5 lines per 100 residents. The result of this development was that as early as mid-2008, Greece ranked 23rd among the European countries.

The kingpin of the broadband growth is the increase in LLU lines which still remains rapid. It is worth noting that at the end of 2008 more than 1/3 of the total broadband lines was provided via LLU. It should also be noted that the

percentage of xDSL access lines via ARYS lines has been constantly decreasing, even if it still remains the basic means for broadband access. This fact indicates the tendency of the alternative providers to transfer their subscribers' base from Wholesale Broadband Access (WBA) to LLU.

As far as the access speeds are concerned, the sum total of broadband lines (99.9%) corresponds to speeds over 1 Mbps, while a percentage over 1/3, exceeded even 10 Mbps. It should be noted that at the end of 2007, only 60.7% of all broadband lines had exceeded the access speeds of 1 Mbps. Respectively, the average speed of the ARYS lines has more than doubled in comparison with that of the previous year.

Despite the rapid growth of LLU in Greece, the decrease in tariffs and the increase in access speeds, the increase rates in broadband penetration are still considered unsatisfactory, since they indicate that it will take Greece more than a decade to reach the average broadband penetration of the European Union (EU).

2.2. Regulatory Interventions by EETT

2.2.1. Amendment of the Reference Offer for Local Loop Unbundling

EETT, in the aftermath of the Public Consultation conducted⁷ from December 21, 2007 to January 21, 2008, decided⁸ the amendment of OTE's Reference Offer for LLU, which provides for the following:

- The clarification of the existing capability of installing a cabinet in the yard of OTE's Local Exchange (L/E), as one more alternative way to Physical Collocation, under the explicit and analytical provision of the relevant procedures.
- The differentiation of the application procedure for Collocation, so that the telecommunications providers will be able to request Co-mingling or Virtual Collocation directly, in case that either there is no available space for Physical Collocation in OTE's L/E or there is no possibility for expanding the existing area of Physical Collocation.
- The amendment of OTE's obligation regarding the provision of specific information to other providers, that will enable them to draft their business plans.
- The clarification of the existing capability of self-providing access and backhauling services via Awireless means of the telecommunication provider in the roof of OTE's L/E, and explicit provision of the respective procedures in the text of OTE's Offer for LLU.
- The increase of the time schedule within which OTE is obligated to deliver the inactive loops.
- The amendment of the damage management procedure.
- The obligation to make the loop's «imaginary number» known to the retail consumer via its inscription on the bills. It is reminded that the «imaginary number» represents the "identity of the wire" that terminates on a consumer's premises and is used by the consumer in every request that he/she may make for a change in service and/or provider.

2.2.2. Collocation Regulation

In the aftermath of a Public Consultation⁹, EETT decided¹⁰ the issue of the Collocation Regulation, which determines the terms, the requirements, and the procedures governing the Collocation of Electronic Communications equipment, and/or the joint use of relevant conveniences by the operators of

services and/or networks of Electronic Communications at:

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

The aforementioned infrastructures can be placed at privately-owned or other buildings, communal areas, local authority areas, and public or private areas.

The resulting benefits for the public and the operators from this Regulation are: the minimization of the burden imposed by the infrastructure works on either the environment or the public; the possibility of allowing a larger number of operators to access services; time savings; and a decrease in the expenditure entailed in the development of infrastructures.

2.2.3. Code of Practice for the Provision of Electronic Communications Services to Consumers

In July 2008 and in the aftermath of a Public Consultation, EETT decided¹¹ on issuing the Code of Practice for the provision of Electronic Communications services to consumers. The necessity for the existence of this specific Code resulted from the great number of consumers' complaints regarding the problems they encountered during their dealings with Electronic Communications services providers.

Analytically, the Code of Practice relates to every stage of the relationship between providers and consumers prior to their contract as well as during their business dealings. It consists of a series of regulations and recommendations that regulate, inter alia, issues such as:

- The valid, complete, and effective information the consumer receives regarding the provided service.
- The signing of a contract between the provider and the consumer after the explicit acceptance and consent given by the latter, always in accordance with the current legislation and provided that the consumer has fully comprehended the terms of the contract and his/her rights relating to the contract's breach.

The Code imposes on providers obligations and regulations that, on the one hand, target the resolution of the problems already detected by EETT and, on the other, aim at raising the awareness of providers with regard to the responsibility that they bear towards consumers. Special emphasis is laid

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

8. EETT Decision 470/038/04-03-2008, GG Issue 490/B/19-03-2008.

9. EETT Decision 461/052/30-11-2007.

10. EETT Decision 472/171/21-03-2008, GG Issue 885/B/14-05-2008.

11. EETT Decision 488/082/15-07-2008.

on the provision of detailed and explicit information to consumers as well as on the right they have to try out new services and switch providers without jeopardizing their right to communications.

Furthermore, according to the Code, the providers are obligated to explicitly inform the consumer during the signing of the contract about:

- The activation time for the requested service.
- The activation of the service on the same day that it occurs: In the event of a delay, they ought to inform the consumers promptly about the reason for this delay and about the new activation time.
- Particularly for the services provided via local loop, the providers are obligated to implement an information system on their websites, which will be updated regularly, at least 4 times per day, and through which the consumer will be able to follow-up on the activation of his/her service as well as on the damage that may eventually emerge.

At the same time, keeping the consumer fully informed about the details of the provided service is considered to be of crucial significance, with special emphasis on the clarity and the transparency of the charges. This process must take place either via the provider's website or via appropriately trained personnel, which must be capable of answering all of the questions a consumer may have. With regard to the services providing Internet access, the provider of services ensures that, the consumer is informed about the following:

- First, the activation of the service must take place, in order to ascertain whether the requested nominal access speed can be achieved for this specific connection of the consumer.
- The nominal access speed stipulated by the contract signed can not be guaranteed to be continuous throughout the duration of the service provision.

2.2.4. Quality Indicators of the Electronic Communications Services

EETT, by Decision¹², determined the quality indicators for the Electronic Communications services provided to the public. The quality indicators are posted on the websites of the providers as well as that of EETT and aim at facilitating the consumers in comparing the quality of services rendered by different providers as well as the certification of the quality of the service that they already receive.

The procedures for measuring and processing the results of the indicators defined by EETT are in accordance with the international standards and recommendations as well as

with international experience. The quality indicators that the providers are obligated to measure are the following:

1. Fixed Telephony Services:

- Unsuccessful call ratio.
- Proportion of public pay telephone services in working order.
- Voice transmission quality.
- Time for the provision of the initial connection.
- Fault rate per access line.
- Fault repair time.

2. Mobile Telephony Services:

- Network availability – radio coverage.
- Blocking probability for voice calls.
- Disconnection probability for voice calls.
- Voice transmission quality.
- Voice calls set-up time.
- Blocking probability for videotelephony calls.
- Disconnection probability for videotelephony calls.
- Voice transmission quality for videotelephony calls.
- Video transmission quality for videotelephony calls.
- Videotelephony calls set-up time.
- Unsuccessful http data transfer ratio.
- Average rate of http data transfer.

3. Broadband and Voice over Internet Protocol (VoIP) Services:

- Data transfer rate in the concentration section of the access network and the backbone network.
- Interconnection capacity.
- Unsuccessful VoIP calls ratio.
- Voice transmission quality for VoIP calls.
- Time for the provision of the initial connection.
- Fault rate per access line.
- Fault repair time.
- Limitations of use.
- Provision of guaranteed quality of service/ ability to join Service Level Agreements (SLA).
- Provision of residential fault repair services.

12. EETT Decision 480/017/13-05-2008, GG Issue 1153/B/24-06-2008.

4. Customer Care Services:

- Availability of helpdesk for end-users.
- Charges of helpdesk services for end-users.
- Ratio of unanswered calls to the helpdesk telephone lines for end-users.
- Average response time for helpdesk telephone lines serving end-users.
- Bill correctness complaints.
- Percentage of end-users complaints resolved.

5. Directory Services:

- Response time for directory enquiry services.

Furthermore, EETT's decision defined, inter alia, the following:

- The measurement methodology, the content, and the form of the information to be published so that the consumers may have access to complete, comparable, and easy-to-use information.
- The manner in which the information is publicized.
- The timeline for publicizing the information.
- The obligation on the part of providers to give EETT a copy of the registered measurements and parameters prior to their being publicized.

Additionally, the providers are obligated to:

- Posting the quality indicators in an explicit and easy-to-understand manner (along with the relevant references directing to explanatory texts) on their website, at a place where the indicators can be easily detected and accessed. The indicators must be kept constantly updated.
- Provide, either after the relevant query by a consumer or to every new subscriber along with the contractual terms, a free-of-charge printout of the content of their website where the quality indicators are posted.

EETT posts comparative tables of the quality indicators for all providers, at an easy-to-access place on its website¹³. The first quality indicators were posted in August 2008 while posting of the majority of the indicators will be completed in 2009.

2.2.5. Revision of the Retail Minus Coefficient

As per its obligation to do so based on its Decision¹⁴, EETT evaluated the retail minus coefficient for calculating the prices

of WBA. It should be born in mind that the specific coefficient was determined¹⁵ for the first time at 20.58% in 2007 while in December of the same year it was re-determined¹⁶ at 20.81% after OTE's suggestion for changes in its retail packages (invoiced and non-invoiced). EETT dispatched a relevant letter to all providers in order to collect the requested data and, using the respective technical-financial model (Discounted Cash Flows Model), decided¹⁷ that the retail minus coefficient is in no need of further readjustment for 2008 and is maintained at 20.81%.

2.2.6. Ensuring the Integrity of the Public Fixed Telephone Networks

EETT conducted a Public Consultation which lasted from December 3, 2008 to January 19, 2009. The topic of the Consultation was the Proposal draft prepared for the Minister of the Interior, Public Administration and Decentralization and the Minister of Transport and Communications on the matter of a Joint Ministerial Decision (JMD) which will define the minimum obligations of the telecommunications providers for ensuring the integrity of public telephone networks and the availability of fixed public telephone services.

The Consultation aims at registering and evaluating the interested parties' views on and their comments about this specific Proposal draft. The draft delineates the minimum obligations that the providers must comply with in order to ensure that public fixed telephone services operate under any circumstances, even in the event of destructive damage or force majeure. Indicatively, the following obligations are mentioned:

- Conducting a risk assessment study.
- Setting up a business continuity plan.
- Setting up an emergency plan.
- Strengthening the resistance of the network via measures of equipment and power supply reserves, environmental security, maintenance, and restoration of network operation.
- Ensuring the integrity and the availability of information necessary for the provision of services.
- Ensuring the continuous access to emergency services.

Furthermore, the Proposal draft includes matters entailing the provision of prompt and effective information for consumers

13. http://www.eett.gr/opencms/opencms/EETT/Electronic_Communications/Telecoms/QualityIndicators/.

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

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

16. EETT Decision 462/176/14-12-2007.

17. EETT Decision 486/152/04-07-2008, GG Issue 1840/B/12-09-2008.

about incidents that threaten or affect the network operation and the provision of services.

According to Law 3431/2006 on Electronic Communications, EETT will monitor that providers comply with the minimum obligations. This will also be stipulated in the specific Proposal draft under Consultation.

2.3. Taking Advantage of the Geographic Information System Technology

Geographic Information Systems (GIS) constitute a mature technology that combines information with geographical data and depicts them on a cartographic background.

GIS are a valuable tool for consumers, telecommunications providers, and the Local Government, which is expected to contribute to furthering Broadband throughout Greece and to reducing the distance that separates us from the digitally developed countries of the EU.

EETT, in its effort to strengthen its regulative work, has chosen to integrate the GIS in the Information Systems which support its internal operation and services to other authorities, companies, and citizens. Within this framework, in September 2008, EETT presented at the 73rd Thessalonica International Fair (TIF) the following three pilot GIS applications:

- Registration and depiction of the providers' networks infrastructures.
- Information of consumers about the quality of the provided connections.
- Depiction of the Broadband Metropolitan optical fiber networks in selected Municipalities and Wi-Fi hotspots.

Specifically, the aforementioned applications will:

- Enable the consumers of fixed telephony and broadband applications, via a special website enhanced by a cartographic depiction and address search, to locate their distance from OTE's L/E and thus estimate the expected quality of their connection. Consumers will also be able to evaluate the provided services and proceed with their task of comparing prices, quality, and form of services.
- Register the works for the Rights of Way of optical fiber networks and provide services that will promote the cooperation of providers at the level of planning

and implementation. This action aims at speeding up complicated and bureaucratic procedures and at the faster development of broadband optical fiber networks. In this context, it is necessary that the information relating to the existing and future optical fiber networks be registered in the GIS.

- Register the infrastructures and allow for the dissemination of this information to the public via a website, in cooperation with Municipalities that implement massively broadband networks and create wireless access points (Wi-Fi hotspots). In this way, citizens will be able to know whether broadband services in the area that interests them are available.

Via GIS, EETT strengthens its work and aims at presenting in the near future:

- The digital depiction of the existing and future infrastructures of Electronic Communications networks of the entire Greek Territory, thus creating the «Cadastre» of the broadband market.
- The more effective monitoring of the geographical development of broadband networks in Greece as well as of the provided Electronic Communications services.
- The registration of the infrastructures of telecommunications providers (manholes, wires, optical fibers) with a view to avoiding damage.
- The analysis of the data of the Electronic Communications market and the targeted exercise of regulative measures, when necessary.
- The registration of all available works regarding optical fiber networks in the Greek Territory.
- The registration of the available Municipalities networks (water supply, sewerages, etc.) which can be put to good use in the works entailing the development of optical fiber networks.
- The facilitation of the project for the licensing and the regular inspections conducted by EETT, as well as the improvement of its internal procedures, such as management.
- The depiction of the networks for the distribution and the provision of postal services.

EETT will disseminate via its website the applications that pertain to consumers, aiming at the fast integration of the GIS applications within the first quarter of 2009.

2.4. Information Actions

A Dialogue Meeting in the framework of Broadband Forum

EETT held a meeting on February 26, 2008 titled «Broadband Forum: Dialogue for Broadband Development», for the presentation and discussion of the suggestions as well as of the conclusions that were expressed in the context of the Broadband Forum.

The Broadband Forum is an EETT initiative initiated in June 2007, in the framework of implementing a multi-dimensional schedule of actions for the «2007 Broadband Year». It consists of 5 Project Teams¹⁸. The goal of the Forum is to examine critical aspects for the development of Broadband through broad dialogue that will embrace all the involved parties of the State, the market, the scientific community, and the society of citizens.

The proceedings of the Forum were completed in 2008 with the publication of 5 project texts that present the views of each Team and are available on the EETT website¹⁹.

EETT's 3rd International Conference for Broadband Internet

For the 3rd consecutive year, on June 6-8, 2008, EETT hosted a three-day International Conference focusing on Broadband titled «Innovation in the Broadband Networks and Services». Its keynote speaker was Mrs. Viviane Reding, European Commissioner for Information Society and Media.

The goal of the Conference was to promote and approach, in-depth, issues such as promotional strategies for innovation in Broadband Networks at a world wide level, the regulative interventions in support of it, and the effect of competition on its growth. Specifically, the first day of the Conference focused on the strategies regarding the development of innovation and the regulative challenges for broadband innovation. During the second day, the emphasis was laid on the regulations for the competition in the broadband market. Last, the proceedings of the third day of the Conference focused on the Greek Electronic Communications market, in an attempt to answer the basic question «The Greek Innovation in Broadband Internet: Myth or Reality?». It was in this framework that the role of organizations with Significant Market Power (SMP), of alternative providers, and of the Civil

Society was thoroughly analyzed.

Among others, conference participants included representatives of Regulatory Authorities from Europe and Asia, international institutions with competences in the Electronic Communications sector, executives of the European and domestic telecommunications markets, public organizations, and representatives of consumer groups and of the civil society.

The conference speeches/ presentations and minutes are available on the EETT website²⁰.

EETT's Broadband Kiosk in the 73rd TIF

In the context of the year of Quality Broadband, EETT participated for the first time in



the TIF. The thematic keystones of promotion for EETT's kiosk regarded broadband services as well as informing Electronic Communications users about their rights and their obligations, the procedures they must follow, and the range of choices at their disposal.

Specifically, visitors to the EETT kiosk had the opportunity, inter alia, to:

- Gather information about Broadband Internet, connect to broadband connections, and «experiment» with broadband applications always assisted by experienced personnel.
- Monitor the pilot GIS application, which registers and depicts the infrastructures of broadband networks in the Greek Territory and provides useful and interactive information services to consumers, providers, and the Local Government.
- Obtain information on EETT activities from the printed material that EETT had published.
- Navigate the upgraded EETT's website which is friendly to users with special needs and enriched with new thematic units as well as modern services such as the RSS automatic notification system, video streaming, etc.

18. It should be noted that the Project Teams are the following: Digital Content and Applications; Education and Training; Combating the Digital Gap; Entrepreneurship; Competition and Viability; and Policies for Broadband Growth.

19. <http://www.eett.gr/opencms/opencms/EETT/NewsRelease/Events/imerida260208/Programma4.html>.

20. <http://www.eett.gr/conference2008/index-gr.htm>.

2.5. EETT's Award

The award given to EETT during the 10th International Telecommunications Conference Info-Com World held in Athens on October 7, 2008 was a significant recognition of EETT's contribution to Broadband growth in Greece.

The President of EETT, Professor Nikitas Alexandridis, dedicated the award to all EETT employees. Furthermore, Mr. Alexandridis stressed that the work of EETT employees is characterized by intensive effort, quality, and diligence and has considerably contributed to the steady, upward course of Broadband in our country.



3. Telecommunications Sector



The actions of EETT in the Telecommunications sector focused on the following directions:

Regarding its regularity role, it initiated the second round of market analysis and definition based on the new recommendation of the European Commission. At the same time, it proceeded with the issue of the Regulations for Wholesale Line Rental (WLR) and Leased Lines. Last, the specification and regulation of the issues regarding the application for the accounting separation of OTE's services is of crucial importance.

Furthermore, EETT undertook actions for the promotion and the safeguarding of competition among networks and services. Towards this direction, it examined, on the one hand, OTE's bundled packages and, on the other, it investigated the actions of other Electronic Communications companies in matters regarding Carrier Pre-selection and Number Portability issues. In the same context, it completed OTE's cost audit and enacted the Code of Practice for Multimedia Information Services (MIS). Last, it set up a Project Team which would monitor the progress of the IPv6 communication protocol issue.

3.1. Market Analysis based on the European Regulatory Framework

According to the regulatory framework for the services of Electronic Communications and Networks, EETT is responsible for the definition and the analysis of the relevant markets in the Greek Territory, as well as for the potential imposition of regulative obligations necessary per case, in the event that the competitiveness of some market proves to be insufficient. The market definition and analysis procedure must take place as soon as possible after the adoption or the most recent revision of the European Commission's Recommendation for the relevant markets.

Given the issue of the Commission's new Recommendation²¹ but also the two-year period that had elapsed since the last round of market analysis, EETT initiated the second round of defining and analysing the relevant markets starting at Market 7 of the new Recommendation and going on to Markets 4 and 5.

- **Market 7: Voice Call Termination on Individual Mobile Networks.**

From July 4 to August 4, EETT conducted a national Public Consultation and at the same time communicated to the European Commission and the National Regulatory Authorities (NRA) the Measures Plan regarding the definition, the analysis of the competition level and the suggested regulatory obligations. On August 1, 2008, the European Commission approved the suggested Measures Plan and EETT proceeded with the issue of the respective Decision²² after taking into account to the highest possible degree the remarks of the European Commission as well as the comments of the national Public Consultation participants.

According to this Decision, there still exist discrete markets for voice call termination on the network of any mobile operator in Greece whose geographic range is the Greek Territory. Additionally, EETT came to the conclusion that the companies VODAFONE, COSMOTE, and WIND still possess Significant Market Power (SMP) in the relatively defined markets. As a result, EETT retained the regulatory obligations imposed in the content of the first round of analysis of the relevant market by introducing amendments regarding the transparency and the price control obligations. Specifically, the following regulatory obligations were imposed on the aforementioned providers:

21. Commission Recommendation of December 17, 2007 «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» [notified under document number E(2007) 5406], (OJ L344/65, 28-12-2007).

22. EETT Decision 498/046/22-10-2008.

1. Provision of access and use of the special network's facilities.
2. Impartiality (non-discriminating treatment).
3. Transparency, including the requirement to publish a Reference Interconnection Offer (RIO) of a specific and brief content. In the framework of monitoring conformity to the transparency obligations, the submission of the Reference Offer to EETT for the latter's ex ante approval is mandatory.
4. Accounting separation.
5. Price control in the form of cost orientation.

Furthermore, as foreseen in this specific Decision, reductions of up to 52% in mobile termination rates will begin to be implemented on January 1, 2009. Its implementation will continue for the next 2 years (see sub-section 3.2.16.).

- **Market 4: Wholesale (Physical) Network Infrastructure Access at a Fixed Location and**
- **Market 5: Wholesale Broadband Access (WBA)**

Taking into consideration the European Commission's Recommendation to member states for the joint analysis of markets 4 and 5 and in the framework of the second round of analysis, EETT placed its proposals for the respective markets under Public Consultation for the period beginning December 17, 2008 and ending January 31, 2009.

After analysing the specific markets, EETT reached the conclusion that, on the one hand, there still exists a discrete, wholesale market for Local Loop Unbundling (LLU) and, on the other, a discrete market for WBA with both markets showing insufficient competitiveness. In that context, it suggested that OTE will continue to have a SMP in those markets, retaining most of the regulatory obligations that were imposed on it during the first round of analysis. Furthermore, it proposed the implementation of amendments that mainly refer to the provision of access and use of the special facilities in both markets as well as the obligations for the price control of WBA market. More specifically, with regard to the LLU market, EETT suggested the imposition of the following obligations:

- Provision of access (full and shared access to metal local loops and sub-loops) including the Collocation obligation as well as the obligation of providing access to ducts / pipes and manholes.
- Non-discriminating treatment.
- Transparency, including the obligation to publish the relevant Reference Offers.

- Accounting separation.
- Price control in the form of cost orientation.

At the same time, EETT suggested the following obligations for the WBA market:

- Provision of access and use of the network's special facilities, by implementing a new access type up to the DSLAM point of presence (or multiplexing node).
- Non-discriminating treatment.
- Transparency, including the obligation to publish a Reference Offer.
- Accounting separation.
- Price control in the form of cost orientation.

The procedure of analyzing the specific wholesale markets aims at increasing competition among providers so that the end-user will be able to enjoy broadband Internet access services at low prices everywhere throughout the Greek Territory. EETT's Decision on those markets is expected in the spring of 2009.

3.2. Developments in the Regulatory Framework – Ensuring Healthy Competition

3.2.1. Interconnection

EETT conducted a Public Consultation, held July 30-September 19, 2008 and regarding the issue of a Regulation for Access and Interconnection. The Consultation aimed at registering and utilising the interested parties' views on and comments about the issue of the relevant Regulatory Decision by EETT regarding issues that relate to the determination of the terms, the requirements and the procedures governing access and Interconnection to authorities that use the public networks of Electronic Communications, data that EETT is obligated to determine according to Law 3431/2006²³.

The goal of the Regulation is the creation of an explicit framework for negotiating the terms for Access and Interconnection among providers of Electronic Communications Networks as well as the clarification of

23. Article 41, paragraph 3; and article 42, paragraph 3.

their obligations regarding the provision of Access and/or Interconnection with other networks. The objective of the suggested regulations is to ensure end to end communication of end-users, who receive services from different Electronic Communications networks, and their unimpeded access to innovative services.

The specific Regulation is expected to be issued within the first quarter of 2009.

3.2.2. Local Loop Unbundling

EETT's Decision²⁴ imposed new Instant Measures on OTE (with an imposition of a sanction threat), in the aftermath of an investigation into OTE's information system and an examination of the complaints filed by alternative operators regarding OTE's non-compliance with its anticipated obligations (the deadlines, primarily) under the new Reference Unbundling Offer (RUO).

According to this Decision, OTE was obligated to comply with its obligations regarding the provision of LLU and particularly:

- To satisfy the overdue activation requests for loops (pending up to April 1, 2008) within 15 working days or substantiate separately for each and every overdue request the reason they are not being granted.
- To satisfy the delivery/activation of the requested overdue Internal Connecting Cables (ICC) in areas of Physical Collocation within 15 working days.
- To modify its information systems appropriately within 3 months at the latest in order to establish valid and complete information and communication among its other information systems and the WCRM-LLU information system so that: i) accurate and/or updated information may be entered, and ii) every OTE employee using information registered in the WCRM-LLU may receive that information in the same way it was registered in the system by the providers.
- To maintain displayed information in its WCRM-LLU information system regarding the amount of the subscribers registered with each Local Exchange (L/E) at the end of each month (regardless of the existence of Collocation to that L/E or not).
- To satisfy the overdue requests of damage to loops

(pending up to April 2, 2008) within 15 working days or substantiate separately for each and every one of those requests the reason they are not being granted.

Furthermore, in the aftermath of last year's Decision²⁵ regarding the imposition of Instant Measures on OTE for LLU issues, EETT ascertained that OTE complied partially with those. Hence, in October 2008, after the relevant Hearing, EETT imposed²⁶ on OTE a fine of 10,991,300 euros. Additionally, EETT addressed a Recommendation to OTE to abstain in future from practices that, according to the current legislation on Electronic Communications and in compliance with EETT's respective Decisions, constitute a violation of its obligations.

At the same time, EETT decided to impose a fine of 60,000 euros on ON TELECOMS having ascertained the existence of infringements of the telecommunications legislation with regard to the procedures involved in the submission of requests by users who wish to receive LLU services. Specifically, in the aftermath of an onsite inspection conducted by an inspecting EETT team, and an examination of the relevant complaints by consumers, it was ascertained that ON TELECOMS had proceeded with the illegal signing of telephone contracts for LLU services by promoting and expediting the requests of consumers prior to or without having received a signed copy of those requests. Furthermore, EETT addressed a Recommendation to ON TELECOMS to avoid in future infringements of the legislation for Electronic Communications and of EETT's relevant Decisions.

3.2.3. Safeguarding the Provision of Universal Service

EETT issued a Decision²⁷, in the aftermath of the relevant Public Consultation, regarding the determination of the performance targets in the provision of Universal Service (US), the definition of the content and the shape of the information to be published as well as the manner of publication for companies with US obligations.

Given the social dimension of the US, the main objective of the above Decision was to safeguard that the end-consumer who receives one or more services from US services enjoys at least the minimum limit of acceptable quality of service. To this purpose, specific and measurable quality indicators were determined in the context of the Decision in order to ensure how conformity would be controlled. Furthermore, all the publication issues of the relevant data were determined for reasons of offering transparency and information to the end-consumer.

24. EETT Decision 474/431/04-04-2008.

25. EETT Decision 455/071/05-10-2007.

26. EETT Decision 497/098/03-10-2008.

27. EETT Decision 472/170/2008, GG Issue 885/B/14-05-2008.

3.2.4. Inspections of Electronic Communications Providers

EETT conducts inspections that mostly aim at ascertaining, on the one hand the conformity of the companies to their obligations as providers of Electronic Communications networks and services and, on the other, at safeguarding subscriber–consumer rights, within the framework of their protection from unlawful and abusive commercial practices. The above inspections are either ex-officio or conducted pursuant to complaints. During 2008, EETT undertook a series of unscheduled inspections that, inter alia, looked into the following:

- The conditions for access and use of the Physical Collocated areas of OTE's L/E.
- The procedures for the activation of requests/services via telephone centers from providers of fixed/mobile telephony.
- The procedure for the provision of MIS.
- Simulations for scenarios of using services of mobile/fixed telephony, etc

It is noted that, the total of the data gathered during these inspections is subject to scrutiny by the competent EETT departments. In the event that unlawful practices are ascertained, the procedure of summoning the companies involved to a Hearing before EETT's Plenary takes place so that the legal administrative sanctions corresponding to each case may be imposed.

3.2.5. Examination of Bundled Services Packages and Infringement of Competition Provisions

In May 2008, EETT gave its temporary approval to the pilot package of the «bundled» «All-in-one» services, on condition that OTE will strictly observe EETT's requirement not to proceed with any changes in the terms/characteristics of the package. The initial approval was valid for a 4-month period and effective as of the date that the package was launched commercially, for an estimated customer base provided by OTE (23,500 customers). EETT reserved the right to submit the package to re-examination, after the 4-month period had elapsed or after the customer base number had been reached.

Further to the above, EETT imposed²⁸ on OTE a fine of 1,000,000 euros for the overdue and inadequate provision of the necessary financial data/information regarding the package of bundled services «All-in-one». OTE had directly

violated its obligation to provide detailed data/information to the Regulatory Authority²⁹ thus causing an unjustified delay in EETT's work during the procedure of the «ex-ante» examination of the above economy package. Additionally, EETT decided to impose a Recommendation on OTE so that the latter may abstain in future from entering into actions that constitute a breach of its obligations.

In October 2008, EETT approved the package again, on condition that OTE would strictly observe its requirement not to proceed to changes in the terms/characteristics of the package. The initial approval covered the time period up to May 20, 2009 and an estimated customers' base provided by OTE (70,000 customers). Once the aforementioned date had elapsed, EETT reserved the right to re-examine the package «ex post», based on the relevant adduced OTE data/information in order to examine whether anti-trust practices, such as cross subsidy and/or horizontal leveraging, predatory pricing, and vertical price squeeze, existed.

Furthermore, during 2008, EETT examined whether there existed any predatory pricing or price squeeze on the part of OTE with regard to the following economy packages submitted for approval:

- Expansion of the economy packages OTEtalk 24/7, OTEtalk Night and Weekend even for calls outside OTE's network with a certain price readjustment.
- Continuation of the economy packages OTEmobile that relate to calls originating from an OTE subscriber and terminating on mobile telephony subscribers. These packages include five talk-time packages (OTEmobile 30, 60, 120, 240 και 480).
- Expansion of the economy packages Conn-x talk 24/7 and Conn-x talk Night and Weekend to calls made to all of the remaining fixed networks.

EETT's Decisions³⁰ allowed for the commercial launch of the above economy packages since the «ex ante» examination of those programs revealed no indications of a «margin squeeze» or «predatory pricing» practices on the part of OTE. However, within the framework of examining and monitoring the ADSL market, EETT imposed³¹ on OTE a fine of 2,000,000 euros because of the latter's refusal to provide information regarding the Conn-x program despite EETT's repeated reminders that OTE send the requested data. Furthermore, EETT decided the imposition of a Recommendation on OTE to refrain in future from entering into actions that may constitute a breach of its obligations.

28. EETT Decision 486/176/04-07-2008.

29. Based on article 64, paragraphs 1 and 4, and article 63, paragraph 1 of Law 3431/2006.

30. EETT Decisions 482/062/26-05-2008, GG Issue 1029/02-06-2008, 486/151/04-07-2008, GG Issue 1475/28-07-2008 and 489/037/22-07-2008, GG Issue 1644/14-08-2008.

31. EETT Decision 486/177/04-07-2008.

Additionally, EETT imposed a fine of 9,000,000 euros on OTE for infringing the legislation of Electronic Communications and competition's protection. According to this Decision, OTE had placed insurmountable obstacles in the first attempt of TELLAS to launch the commercial promotion of a double-play service (combination of fixed telephony and Internet) into the Greek market. Specifically, EETT ruled that OTE, in its capacity as the exclusive provider of the core access network, had breached the relevant provisions of the Common Market law for the provision of «open network». Moreover, OTE had abused its Dominant Position in the telecommunications market since it had not permitted, as it ought to have done, its competitor TELLAS, to promote an innovative service. Instead, it had deliberately refused the competitor provision of network access via Collocation and relevant facilities through which TELLAS could serve its customers.

3.2.6. Price Regulation on the Retail Access Services and Telephone Services

EETT, in the context of its responsibility to examine OTE's price-lists in the markets where the latter holds a Dominant Position and to observe OTE's relevant obligations, determined³² new price caps and sub-caps for the regulated retail access services and telephone services. These new maximum limits regard, inter alia, the following services:

Local calls within OTE's network	3.04 €cent/min
National calls within OTE's network	5.32 €cent/min
Dial-up calls from OTE subscribers to the Internet (including the Greek Single Access Number) when the Internet Service Provider (ISP) is hosted by interconnected with OTE's	1.38 €cent/min

Remark: The above prices do not include VAT

It should be noted that the retail access services (monthly rental and the connection fee for PSTN and ISDN BRA) are subject to price cap and sub-cap³³, whereas the retail service of publicly available local and national telephone services provided at a fixed location are subject to price cap³⁴. Analytically, the price cap and sub-cap equal the respective calculated weighted retail price with actual data (WRP_{AD}), incremented

by the percentage change of the Average Annual Consumer Price Index reported by the National Statistical Service of Greece (NSSG). The WRP_{AD} for the products of fixed access is calculated by taking into account, on the one hand, the retail prices of OTE and, on the other, its retail revenues generated from those products during the most recent twelve-month period available.

3.2.7. Mergers / Acquisitions

EETT, in its capacity as the Competition Commission in the Electronic Communications market, investigated³⁵ the notified agreements. More specifically, depending on the case, it either investigated the merger data (case of article 4^a of Law 703/1977), or analyzed in depth the relevant operation market of each operator based on their corresponding revenues (case of article 4^b of Law 703/1977), in order to detect any potential cases of obstruction in competition.

Analytically, the agreements served to and approved by EETT during 2008 were the following:

1. The concentration notification³⁶ for acquiring the control of FORTHNET by FORGENTO LTD.
2. Acquisition³⁷ of INFOTE by ITHACA – Directory Services and Participations.
3. Acquisition by FORTHNET³⁸ of the subsidiary companies NETMED N.V and INTERVISION SERVICES B.V controlled by MYRIAD INTERNATIONAL HOLDINGS B.V (MIH) and TYLETYPOS CYPRUS LIMITED.
4. Acquisition of ALGONET's total shares by NETONE.

The acquisition of the OTE Group by the DEUTSCHE TELECOM Group was of strategic and national importance. The agreement was investigated by the European Commission Directorate General for Competition due to the high revenues of the participant companies while EETT was limited to investigating the licensing issues of the relevant acquisition under the requirement of notifying within 2 months the approbatory resolution made by the European Commission Directorate-General for Competition.

3.2.8. Carrier Pre-Selection

EETT placed under Public Consultation its proposals for

32. EETT Decision 491/027/25-07-2008.

33. EETT Decision 411/017/22-11-2007.

34. EETT Decision 412/021/29-11-2007.

35. EETT Decision 412/021/29-11-2007.

36. According to article 4^a of Law 703/1977.

37. According to article 4^a of Law 703/1977.

38. According to article 4^b of Law 703/1977.

the amendment of the Carrier Pre-Selection Regulation³⁹ and after taking into consideration the answers of the providers, issued a Decision⁴⁰ for a new Regulation. The most important modifications included in the Regulation are the following:

- The Regulation foresees that, with regard to the provision of telephony services via Carrier Pre-Selection and/or Carrier Selection, changing from one pre-selected provider to another terminates ipso jure the contractual agreement with the former provided that the telephony services are rendered at a monthly rental. With regard to Carrier Selection, the contractual agreement can continue as far as Carrier Selection is provided at no monthly rental. This specific amendment was a necessary one in order to eliminate a tendency observed and denounced by those consumers who even after cancellation of the Carrier Pre-Selection continued to receive from the cancelled pre-selected provider bills bearing monthly fees⁴¹.
- It was clarified that, during the submission of a request for Carrier Pre-Selection over the phone, the provider is also obligated to record, inter alia, the minimum amount of data necessary for validating a contract by distance⁴². This provision was included in order to further protect consumers.

At the same time, taking into consideration the complaints of subscribers over Carrier Pre-Selection issues, EETT conducted a series of Hearings of telecommunications providers and imposed the following fines:

- On TELLAS⁴³ total fines of 600,000 euros.
- On VIVODI⁴⁴ a fine of 100,000 euros.
- On TELEDOME⁴⁵ a fine of 500,000 euros.

The above fines were imposed due to the infringements of the Electronic Communications legislation regarding the provision of telephone services via Carrier Pre-Selection such as the non-disengagement of subscribers from the provider's network, cases of arbitrary activation of the Carrier Pre-Selection, and arbitrary abrogation of requests for cancelling Pre-Selection.

3.2.9. Number Portability

Number Portability registered a rapid increase during 2008 since the ported numbers of fixed and mobile telephony

exceeded 925,000 compared to approximately 650,000 in 2007. Analytically, 362,601 numbers of mobile telephony (annual increase 67%) and 562,961 numbers of fixed telephony (annual increase 150%) were ported.

Overall, 1,841,876 subscribers retained their initial phone numbers while switching to another operator during the period March 2004⁴⁶-December 2008. Among them, 904,649 were mobile telephone numbers and the remaining 937,227 were fixed telephony numbers.

It is worth mentioning that, for the first time, the ported fixed telephony numbers exceeded the respective ones of mobile telephony, a fact that is undoubtedly connected to the increase of the LLU lines for the provision of bundled services such as telephony and broadband services since, in the overwhelming majority of cases, the unbundling of local loop goes hand in hand with Number Portability.

At the same time, EETT in the context of its monitoring role, decided⁴⁷, in the aftermath of a great deal of complaints, to take Instant Measures against TELEDOME, for non-compliance of the company with its obligations regarding the dispatching of Number Portability requests.

Specifically, the submitted consumer complaints related to requests for canceling the connection with TELEDOME and, at the same time, to the refusal of the company in its capacity as a provider-giver to grant consumer requests for Portability to other providers in their capacity as providers-receivers. The result was that the consumers were hemmed in TELEDOME's network while, at the same time, they were incapable of using telecommunication services. According to the Decision for Instant Measures:

- TELEDOME was summoned to accept immediately, via the National Reference Data Base for Number Portability (EVDAF), the approximately Portability requests which it had refused to dispatch.
- In the event that nothing will be done during the prescribed period, EETT, as the supervising authority of the EVDAF's operation and management, will order the EVDAF's manager to proceed to the necessary actions for accepting the total number of the aforementioned Portability requests.

39. EETT Decision 366/048/08-12-2005 «Amendment and Codification to a unified text of the Regulation for Implementing Carrier Pre-Selection in the Greek Market», GG Issue 22/B/17-01-2006.

40. EETT Decision 478/114/06-05-2008 «Amendment of EETT Decision 366/048/08-12-2005», GG Issue 1106/B/13-06-2008.

41. Some providers rendered telephone services via Carrier Pre-Selection at a monthly rental. When the Carrier Pre-Selection was cancelled they did not consider the contract itself cancelled because the terms of the service provision foresaw that, after cancellation of the Carrier Pre-Selection, subscribers would be able to continue making their calls via Carrier Selection.

42. According to Law 2251/1994 «Protection of consumers».

43. EETT Decisions 485/083/27-06-2008 and 486/175/04-07-2008.

44. EETT Decision 485/079/27-06-2008.

45. EETT Decision 485/080/27-06-2008.

46. The period corresponds to the time when EVDAF, the specialized data base for the facilitation of Portability in Greece began.

47. EETT Decision 1402/610/03-10-2008.

3.2.10. Cost Audits

In cooperation with independent agencies, EETT conducted and completed the 2008 cost audit with actual data as of 2006 and forecasted data for 2007 and 2008. The submission of the majority of the cost audited data from OTE started in December 2007 and was completed in January 2009.

EETT's Decision⁴⁸ approved the result of OTE's cost audit determining the price-lists for the services of the regulated wholesale markets for whose price control, cost audit, and accounting separation OTE bears corresponding obligations; and of the regulated retail markets for which OTE bears the obligation of price control via cost audit.

The cost audit regarded the services of Interconnection, LLU (including the Collocation services), WBA, Interconnection Leased Lines, end to end Wholesale and Retail Leased Lines and Portability services. The costs of the above services were determined based on the following cost-accounting methods i) Long Run Average Incremental Cost (LRAIC) and ii) Fully Distributed Cost (FDC).

It should be noted that for the first time in the history of the Greek telecommunications market and after EETT's persistent efforts, the cost audit for OTE was completed within the first quarter of the cost-audited year, a fact which, compared to the past, creates a higher degree of safety regarding the price-lists environment in which telecommunications providers operate.

At the same time, in November 2008, EETT commenced the 2009 cost audit with actual data as of 2007. The submission of the majority of data by OTE for this specific audit started in mid-November and was completed in early December. The results of this cost audit are expected within the first months of 2009.

3.2.11. Accounting Separation

EETT's Decision⁴⁹ specified and regulated, inter alia, the implementation details for the accounting separation obligation in the individually-defined Electronic Communications markets that had been imposed on OTE in its capacity as SMP provider. Furthermore, the Decision includes the procedures and the timetables for the submission and examination of the data aiming at ensuring: OTE's compliance with the regulatory obligations of price

control, cost-orientation and accounting separation; and the effective implementation of the transparency principle in those markets.

Specifically, this Decision specifies:

- The general principles of cost-orientation and accounting separation.
- The way of implementing the regulatory obligations of price control / cost-orientation and accounting separation imposed on OTE.
- The implementation details for the obligations of publicity / publication of certain accounting / cost-orienting reports regarding the regulative services of OTE (under the reservation of business secrecy).
- Procedural issues of the annual cost audit.

It should be noted that a Public Consultation was conducted during the period January 21 to February 21, 2008. Its objective was the Methodologies / Principles of Cost-orientation and Accounting Separation for the implementation of the regulatory obligations of price control and cost-orientation imposed on OTE for the individually defined markets. EETT's Decision was based on that Measures Plan and on the answers given by the Consultation participants.

3.2.12. E-Signature

During 2008, EETT conducted audits on the supervised Certification Service Providers (CSPs). Those audits related to the compliance degree of the providers with the regulatory framework for e-signatures and especially to the criteria and the requirements pertinent to providers who issue simple or recognized certifications. EETT's monitoring actions consist of:

- Theoretical examination (scrutiny) of the CSPs documents related to the provided services as to their completeness and compliance with the current legislation.
- On-site inspections of the CSPs infrastructures in order to determine the compliance degree of the providers with the manufacturing, technical, operational, procedural, and organizational requirements of the regulatory framework for the provision of certified e-signature services.

At the same time, aiming at promoting e-signatures in the Greek market, EETT is in close cooperation with the competent public institutions that plan or implement e-government applications.

48. EETT Decision 476/014/23-04-2008, GG Issue 904/B/16-05-2008.

49. EETT Decision 482/051/26-05-2008, GG Issue 1151/B/24-06-2008.

3.2.13. Domain Names Assignment

The increase rate of the assignment for [.gr] Domain Names ranged at 23% compared to 21% in 2007. The total number of the assigned Domain Names, including sub-domains (com.gr, net.gr, org.gr, edu.gr, gov.gr) is presented in Table 2.

Table 3 displays the number of assignments compared to the number of applications per month for the period January - December 2008. The average assignment

percentage in relation to the applications in 2008 ranged at 89%, compared to 92% in 2007, and 91% in 2006. It should be pointed out that, in order for the data of the following Table to be comparable, it was the date of application that was set as the time measure and not the date of the EETT Decision on Assignment/ Rejection.

In October 2008, EETT announced an open Public Competition for appointing a Contractor for the development and installation of the Registration System for [.gr] Internet

Table 2
Assigned [.gr] Domain Names During 2007 - 2008

DOMAIN LEVEL	2007	2008
.gr	194,307	239,623
.com.gr	8,283	10,142
.net.gr	749	841
.org.gr	413	533
.edu.gr	631	746
.gov.gr	105	473
TOTAL	204,488	252,358

Domain Names as well as for its operation and its management for a 5-year period. The most important requirements of the announcement, due to technological growth, are the following:

- Possibility of connecting to the Internet by using a IPv6 e-mail address. According to the statement of the European Commission, the member states are obligated to ascertain that by 2010 at least 25% of all users will have acquired this connection possibility.
- Safety and Integrity of the System for the Internet Domain Name Assignment. In the context of dealing with subjects regarding the integrity and the accuracy of the answers that the providers of Name Assignment give, the operation of the safety protocol DNSSEC (Domain Name System Security Extensions) is required.

3.2.14. Wholesale Leased Lines

After certain amendments, EETT approved⁵⁰ OTE's Reference Offers for the Wholesale Leased Lines and the provision of Part Circuits. The obligation for the submission of the above Offers was imposed on OTE following a previous Decision by EETT⁵¹, as a measure against the lack of competition in the wholesale market of Leased Lines.

The Reference Offer for Wholesale Leased Lines regards OTE's provision of the Leased Lines terminating segments and trunk connections and related facilities while the Reference Offer for Part Circuits regards the OTE's provision of terminating segments and trunk connections that constitute Part Circuits of Leased Lines.

The individual regulations of the Reference Offer for the

50. EETT Decision 470/037/04-03-2008 «Approval of OTE's Reference Offer for the provision of Wholesale Leased Lines, in application of EETT Decision 401/014/06-09-2006 (GG Issue 1419/B/26-09-2006)», GG Issue 498/B/20-03-2008, EETT Decision 477/002/23-04-2008 «Approval of OTE's Reference Offer for the provision of Part Circuits, in application of EETT Decision 401/014/06-09-2006 (GG Issue 1419/B/26-09-2006)», GG Issue 987/B/28-05-2008.

51. EETT Decision 401/014/06-09-2006 «Decision about the Definition of the wholesale markets for Leased Lines (markets 13, 14 of the European Commission's Recommendation), of the Providers with Significant Power in those markets, and their Obligations», GG Issue 1419/B/26-09-2006.

Table 3
Number of Assigned [.gr] Domain Names in Relation to the Applications 2008

MONTH	APPLICATIONS	ASSIGNMENTS	REJECTIONS
January	8,848	7,180	1,668
February	6,880	6,579	301
March	6,801	6,491	310
April	7,710	7,364	346
May	7,885	7,521	364
June	6,635	6,373	262
July	7,028	6,556	472
August	4,279	4,087	192
September	6,871	6,577	294
October	6,940	6,637	303
November	6,875	6,484	391
December	7,052	3,073	3,979
TOTAL	83,804	74,922	8,882

Wholesale Leased Lines and the one for the provision of Part Circuits were defined based on the measures approved by EETT and the European Union (EU) for markets 13 (wholesale market of Leased Lines Terminating Segments) and 14 (wholesale market of Leased Lines Trunk Connections) of Electronic Communications, taking into consideration the current condition of the Greek market and the successful course of international practice. It should be pointed out that OTE's Reference Offers do not regulate the contractual relationships at the retail level between providers and subscribers.

Specifically, the above Reference Offers determine:

- The rules, requirements, and procedures according to which OTE is obligated to provide the necessary services and relevant facilities to Electronic Communications providers, in order for the latter to be able to offer, in relation to OTE, competitive services to consumers.
- The financial terms regarding the provision of wholesale Leased Lines (e.g. procedures for invoicing, payment, resolution of differences over financial issues).

- The terms of the Service Level Agreements (SLA), which:
 - Determine the timetable for OTE's provision of the relevant services.
 - Regulate issues regarding reporting and fixing of damage.
 - Provide for the payment of certain penalty clauses by OTE in the event of its non-compliance with the anticipated timetables.

3.2.15. Wholesale Line Rental in the Public Telephone Network

The relevant EETT Decision⁵² approved OTE's Reference Offer for Wholesale Line Rental (WLR). The Decision took into consideration, on the one hand, the comments that were submitted to EETT within the framework of a Public Consultation conducted with regard to this specific issue and, on the other, the current situation in the market of retail PSTN και BRA-ISDN in which the WLR is implemented.

52. EETT Decision 478/115/06-05-2008, GG Issue 988/B/28-05-2008.

The WLR provides the alternative operators with the possibility of leasing access lines under wholesale terms to the end-user and reselling them to the consumers. In this manner, the alternative operator has a complete retail relationship with the client for all telephone services issuing a unified bill which includes both the monthly rental and the cost of the calls. The provided WLR services include the PSTN WLR, the wholesale rental of Digital Access Lines ISDN-BRA, and Digital Services via WLR Access PSTN and ISDN-BRA.

The dispatch of calls via WLR is based on the Carrier Pre-Selection service and specifically on Option 3 of the Pre-selection (all call types). Specifically, it is pointed out that it will become possible for subscribers using Carrier Pre-Selection to pay their telephone services monthly rental in a unified bill issued by the alternative operator without having to pay it in a separate bill to OTE. In the event of calls which are not dispatched via Option 3, the operators are able to request the data of the calls dispatched via OTE's network, in order to issue a unified bill.

The individual regulation regarding the WLR was defined based on the measures approved by EETT and the European Commission for the markets of retail access in the public telephone network at a fixed location (markets 1 and 2).

Additionally, the relevant EETT Decision⁵³ approved the costs relating to the provision of WLR services and specifically the applied retail minus percentages. The introduction of the WLR is expected to contribute in the growth of competition in the retail market while the consumer will benefit from the WLR services in terms of choices and prices.

3.2.16. Reduction in Mobile Termination Rates

In the context of price control obligation (see sub-section 3.1.), the EETT Decision imposed the obligation for the gradual reduction in the termination rates on the network of every operator with SMP in the defined markets for mobile networks (glide path). The glide path is comprised of three steps which include the appropriate adjustments in the regulated maximum price (price ceiling) that will be carried out by the mobile operators:

- On January 1, 2009 (price ceiling 0.0786 Euros/minute).
- On January 1, 2010 (price ceiling 0.0624 Euros/minute).
- On January 1, 2011 (price ceiling 0.0495 Euros/minute).

The target price on January 1, 2011 (last step of the glide path) will continue to be the price ceiling of the termination rates

unless EETT issues another, more recent Decision regarding this issue.

For the determination of the symmetrical target price, EETT updated the bottom-up cost model, which was developed in the context of the first round of analyzing the relevant market, according to the current market situation. In determining the price target, EETT took into consideration the guidelines of the European Commission, according to which, the target price must be symmetrical unless there are significant cost differences that are not controlled by the operators and justify the preservation of the asymmetry. Specifically the European Regulators Group (ERG), in the joint thesis that was expressed in relation to the symmetry of the mobile termination rates⁵⁴, maintains this principle by stating that «the termination rates should normally be symmetric and asymmetry, acceptable in some cases, requires an adequate justification».

Overall, the reductions that will be implemented in the mobile termination rates as of January 1, 2009 will reach 52% for the next two years as of that date and are expected to bring about a reduction in the retail prices of calls to mobiles for the benefit of consumers.

3.2.17. Reduction in Fixed Termination Rates

The EETT Decision⁵⁵ determined the re-adjustment of the target price for 2009, as it had been defined by a former EETT Decision⁵⁶, in the network of providers with SMP in the individual defined markets for wholesale call termination to end-users. As of January 1, 2009, the target price is set at 0.00892 Euros/minute and is reduced by approximately 27% compared to the former price of 0.01131 Euros/minute. This fact is expected to result in a further reduction of the retail charges for the subscribers of either OTE or the alternative operators when they call subscribers of other alternative operators.

EETT will conduct regular inspections of the termination rates in order to ensure, on the one hand, the implementation of the price reductions and, on the other, to prevent any possible failure to comply with the glide path procedure.

3.2.18. Reduction in International Roaming Rates

The Roaming Regulation has now been in force for over one year (since June 2007) and brought about benefits for those European citizens who made and received phone calls on their

53. EETT Decision 499/092/22-10-2008, GG Issue 2404/B/26-11-2008.

54. ERG's Common Position on symmetry of fixed call termination rates and symmetry of mobile call termination rates, ERG (07) 83 final 080312.

55. EETT Decision 505/058/23-12-2008, GG Issue 2706/B/31-12-2008.

56. EETT Decision 459/135/14-11-2007, GG Issue 2342/B/11-12-2007.

mobile while traveling within the EU. It should be reminded that, according to the Regulation, the mobile operators are obligated to offer to their subscribers as of August 2007 the «Eurotariff», which is the maximum price limit for the Roaming charges for call-making and call-receiving within the 27 member states of the EU. On August 30, 2009 there was a further reduction in the upper limits of the wholesale and retail prices for Eurotariff phone calls while, in general, the charges implemented by the Greek mobile operators ranged below those limits.

Additionally, on September 23, 2009, the European Commission implemented a Proposal for examining the amendment of the Roaming Regulation, by expanding the regulation of the telephony prices by three years (from July 2010 to July 2013), as well as the beginning of the regulation for the prices of the Short Message Service (SMS) and data communication services as of July 2009 and the protection of consumers from bill shock when using data communication services under Roaming.

EETT is responsible for ensuring the compliance of the mobile operators with their obligations according to the specific Regulation within the Greek Territory. At the same time, it monitors the progress of the wholesale and retail prices for the provision of telephony, SMS, and data communication services to International Roaming users while it cooperates with the ERG on the drafting of Directives regarding the Roaming Regulation and reports on the compliance degree of the mobile operators with their obligations

3.2.19. Measures for the Protection of Consumers from Dialers

In the aftermath of the measures adopted in 2007 for the protection of consumers from dialers in international destinations, EETT continued in 2008 to monitor via the operators' fortnightly reports the traffic to the specific list of international destinations⁵⁷ that presented all the relevant problems. Hence, on February 15, 2008, EETT blocked the international termination for Sao Tome and Principe (00 239), since there had been a significant increase in the calls made to this destination while, at the same time, relevant complaints had been filed with EETT by subscribers regarding calls made without their consent.

Starting with February 15, 2008, the date when the last blocking measures were implemented, there were no longer any complaints filed with EETT by consumers over calls made to international destinations without their consent. Moreover, the examination of the fortnightly reports submitted to EETT

by the providers of public fixed telephony services according to EETT Decisions didn't show any suspicious increase in the traffic to any other international destination.

The blocking of all the international destinations on that specific list was terminated in September 2008. EETT did not renew those measures given that:

- Internet users in Greece have been adequately informed and have taken measures against dialers to international destinations.
- The significant increase of the users of broadband access to the Internet has resulted in their automatic protection from the risk of dialers.

In the context of its monitoring role and in cooperation with the providers, EETT still supervises any possible increases in the traffic to those destinations aiming first at detecting any dialer threats to consumers and then taking the necessary measures.

3.2.20. Subscribers' Directories

The EETT Decision⁵⁸ approved the Regulation for determining the form of subscribers' directories as well as of the way and the cost for disposal of subscriber data by the providers within the framework of providing directory services to the public.

Specifically, this Regulation defines the following:

- The form of the subscribers' directories that are at the end-users' disposal, within the framework of the obligation to provide US. The obligations regard the printed and the electronic version of the directories.
- The way of disposing subscribers' data among providers of electronic services networks or Electronic Communications services, aiming at providing directory services to the public. In this context, those who are responsible for disposal and reception of the data, the form of the disposed data, and the manner in which the data is disposed and updated, are determined.
- The cost and pricing principles of providing subscribers' data among the providers who aim at rendering directory services to the public. Additionally, the details regarding the methodology for calculating the access cost to the unified data base of the US providers are also determined.

It should be pointed out that this Decision regulates issues for the disposal and use of subscribers' data destined only for the provision of directory services.

57. This specific list includes the following international destinations: Nauru (00 674), Solomon Islands (00677) and Wallis and Futuna (00 681), Kiribati (00 686), Guinea Bissau (00 245).

58. EETT Decision 491/026/25-07-2008, GG Issue 1622/B/13-08-2008.

3.2.21. Multimedia Information Services

On January 1, 2008, the Code of Practice for Multimedia Information Services (MIS)⁵⁹ became effective, enacting rules for the provision of the following services:

- Audiotext.
- Videotext.
- Premium SMS (PSMS).
- Premium Multimedia Messaging Service (PMMS).

In the context of the Code, the MIS provided via the Internet are also regulated while the content of specific services is not. According to the Code of Practice, the MIS providers are obligated, inter alia:

- To publish a table with the MIS they provide including the price-list for such.
- To offer consumers call-waiting at no extra charge while they wait to connect with the service.
- To feature a Help-Line provided at no extra charge and displayed on all MIS announcements–advertisements.
- To explicitly declare on every promotional material the full description of the charge.
- To distinctly quote the charges during the advertising promotion of their services.

In the context of this specific Code of Practice, issues regarding the protection of end-users from illegal dialers are also regulated. Given that the Code regards MIS provided at numbers of the National Numbering Plan (NNP), it does not regard services via dialers to international destinations.

During 2008, EETT conducted inspections into MIS providers in order to ascertain that they comply with the Code of Practice. The inspections took place either ex officio or pursuant to complaints and regarded the MIS that are provided either via the number series 901XXXXXX or by means of an SMS.

A particular matter arose from the MIS that are being provided via sending SMS to and receiving SMS from the short codes of the 54XXX series (e.g. votes, contests etc.). Within the framework of its competence, EETT elaborated the content of the submitted complaints and investigated whether

there had been an infringement of the telecommunication legislation on the part of the providers that were assigned those short codes. Specifically, it investigated, inter alia, whether the providers had adequately informed consumers about the charge involved in those specific MIS.

Those inspections resulted in EETT's issuing a Recommendation directed to consumers who wish to use MIS and aiming at keeping those consumers fully informed and protected.

Specifically, EETT suggested the following to consumers:

- Not to register their mobile number on any websites, unless they have read carefully the conditions and requirements under which the service that interests them is being provided. Advertisements of free offers or participation to draws are probably attached to subscribing services.
- A common MIS model is the subscribing services for which the consumers may pay a lump sum or an amount per week for services such as the regular reception of wallpaper or the frequent purchase of ringtones. The subscribing models of the MIS differ per provider.
- To read carefully all the conditions of the advertising entry in order to be informed whether it is about a subscribing service or a service that can be obtained via many SMS's etc.
- The charge for the SMS of a MIS may regard either the sending or the receiving of the SMS. The charge when receiving the SMS usually relates to subscribing services. In any case, the cost presented in the advertising entry is the one consumers are charged with regardless of whether their mobile provider charges them for the incoming or the outgoing SMS.
- To make a note of the Help Line number displayed in the announcements–advertisements of the service and provided at no extra charge.

3.2.22. The Transition of the Internet from IPv4 to IPv6

The operation of the Internet is based on the communication protocol IPv4, which defines an address system for recognizing the devices and the way that the communication takes place. Despite the fact that the IPv4's address spectrum includes 4.3

59. In Greece the MIS are provided via the 10-digit numbers of the 901 XXX XXXX and 909 XXX XXXX patterns and via the 5-digit short codes 14XXX, 190XX-195XX, and 54XXX, which should be clearly displayed on all advertising material of the MIS operators.

billion addresses (2³²), the explosive increase in the Internet users and devices is expected to lead to the spectrum's exhaustion by the year 2011.

In order to deal with this grave problem, the scientific community during the period 1993 – 1998 developed a new protocol, IPv6, which practically offers an unlimited address spectrum and is about to fully replace IPv4. IPv6 is improved in the sectors of portability, security, quality of service, and network complexity.

The transition to IPv6 creates new challenges and new business opportunities. IPv6 is not directly compatible with IPv4 since the devices that support the former protocol cannot communicate directly with the devices that support the latter one. Consequently, the transition requires the use of appropriate strategies and techniques, such as the parallel use of both communication protocols and the use of «tunneling» and «translation» systems.

The installation and the operation of the new protocol involve costs for educating personnel and upgrading both network and equipment. In this frame, the EU has financed more than 30 projects for researching and developing the promotion of IPv6, succeeding in acquiring know-how and experience in implementing and operating the IPv6 networks.

During 2008, EETT set up a Project Team whose aim is to keep up with international developments on this issue, continue to receive information on it, cooperate with the respective regulatory authorities of the EU member states, and propose actions for the prompt exploitation by the Greek market of the new protocol and the relevant technologies. Furthermore, in collaboration with the Greek Research and Technology Network (GR-Net) and with the participation of organizations

from the public and private sectors, EETT set up a Greek IPv6 Task Force for the promotion of IPv6 use in our country.

3.2.23. Assignment of Numbers from the 116 Series for Social Purposes

The numbering area starting with «116» is bound in the NNP for coordinated numbers relating to services of social interests⁶⁰. It should be noted that, the coordinated service of social interest is accessible to individuals via toll-free call numbers and reflects a special social need, contributing to the quality of life or the security of citizens or providing assistance

to citizens who are facing difficulties.

The above special numbers are national short codes of the 116XXX series, which, according to the relevant EETT Decision⁶¹, are used as 6-digit short codes for the provision of services, coordinated at the European level, and are of great significance to the society. As early as 2007, EETT had already assigned the short code 116000⁶² to an official authority, after the latter's relevant request, as an open telephone line where reports for missing children would be made. This specific service:

1. Receives calls reporting missing children and forwards them to the police.
2. Offers guidance and support the caretakers of the missing children.
3. Supports the investigations.

Additionally, during 2008, EETT assigned⁶³ the 116111 code to an official authority for the operation of a telephone line providing service that offers help to children that need care and protection. Specifically, this service:

1. Connects children with authorities and aid resources.
2. Provides children with the opportunity to express their concerns and discuss issues of direct interest to them.
3. Provides children with the opportunity to communicate with someone in the case of an emergency.

At the same time, the List with the bounded numbers relating to coordinates services of social interest includes the number 116123, which is available for assignment by EETT, as a telephone line for direct emotional support assistance.

Within the framework of its responsibilities, EETT regularly the use, throughout the Greek Territory, of the aforementioned assigned numbers in order to brief the European Commission accordingly.

3.2.24. Amendment of the Regulations governing General Licenses of Telecommunications Providers

From November 17 to December 16, 2008, EETT conducted a Public Consultation that had as its object the amendment of the General Licenses Regulation in order to determine the

60. Decisions of European Commission 2007/116/EK/15-02-2007 and 2007/698/EK/29-10-2007.

61. EETT Decision 441/121/21-06-07, «Regulation for Managing and Assigning the Numbering resources of the National Numbering Plan», GG Issue 1260/B/23-07-2007.

62. Decision EETT 451/006/11-09-2007.

63. Decision EETT 472/167/21-03-2008.

obligations of the providers of Electronic Communications networks when they produce or transmit radio and television programmes. In the draft proposed by EETT for amending the General Licenses Regulation, additional terms for General Licenses are defined in order to:

- Provide a network for the transmission of signals of terrestrial analogue and digital broadcasting by using frequencies that have been assigned for the transmission

of radio-TV signal.

- Provide services for distributing broadcasting signals.

Ten (10) authorities participated in this Public Consultation. Among them, were providers of Electronic Communications networks and providers of radio-TV programs. The relevant Regulation is expected to be issued within the first semester of 2009.

3.3. EETT Controlling and Monitoring Actions

SUBJECT	NUMBER OF HEARINGS	FINES	RECOMMENDATION	EXEMPTION	OTHER SANCTIONS/ DECISIONS
Carrier Pre-Selection	11	4	1		1
LLU	13	2		2	
Dialer	77				
Cost Audit issues					
Comprehensive Directories	2				
Interconnection / Numbering / Leased Lines	6		4	2	1
Competition/ SMP	11	3	3		2
Domain Names	67				
Other	5		1		
Data Provision	10	8			
Portability	8		2	2	2
TOTAL	210	17	11	6	6

Please note that the Decisions on Hearings held by EETT are subject to judicial control in accordance with the applicable Law.

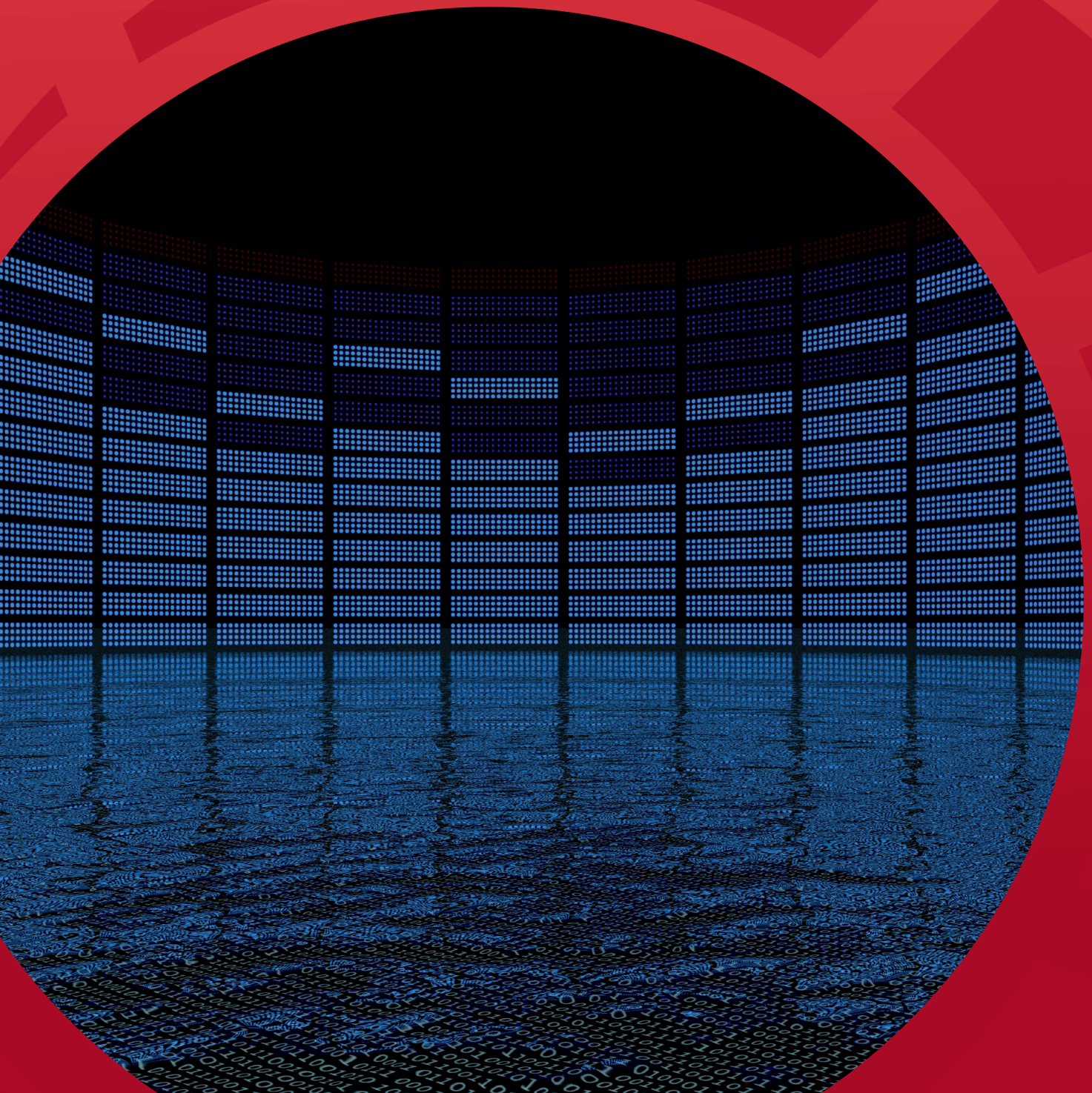
3.4. Goals

The principal goals set by EETT for 2009 in the Electronic Communications Sector are the following:

- Promote the convergence between Telecommunications and Mass Media and contribute to the transition to digital TV.
- Raise the competition level in the voice and Broadband markets and simultaneously restrict any asymmetric conditions in the market.
- Encourage telecommunications providers to climb the ladder of investment.
- Strengthen LLU growth and safeguard equality of access aiming, inter alia, at the development of Broadband throughout the Greek Territory.
- Promote regulations for access to the sub-loop, the Interconnection, and the joint installation/use of ducts.
- Evaluate the regulatory behavior of incumbents and conduct a Consultation for the possible separation of networks and services.
- Encourage the development of advanced technologies and determine the business model for the transition to Next Generation Access (NGA) networks and the development of the Fiber to the Home (FTTH), where feasible.
- Encourage the introduction/development of products of Fixed-Mobile Convergence as well as innovative offers of IPTV/Video on Demand, by deterring SMP providers from abusing their position.
- Amend the numbering framework in order to reflect the market progress and examine the termination rates (mobile/fixed) involved in its implementation.
- Provide further transparency to consumers and facilitate them in their efforts to compare the offered products.
- Safeguard the unremitting availability of services and networks of Electronic Communications.
- Inform and educate consumers about the innovative services.



4. Radiofrequencies Spectrum Sector



In 2008, EETT focused on incorporating its new responsibilities in its operation, according to the new regulation framework of digital television and the smooth transition to digital television broadcasting. It also undertook actions in support of broadband mobile services development in our country.

At the same time, the main concern of EETT was the effective management of the scarce radiofrequencies spectrum resource and the strengthening of its monitoring mechanisms. An analytical description of the individual actions is presented in the following sections.

4.1. Developments in the Regulatory Framework

4.1.1. Steps of Technologies and Services Convergence in the 900/1800 MHz bands

The development of the new, 3rd Generation (3G) services by the Mobile Telephony Networks in order to meet the increasing needs and provide new facilities to their users is particularly important in our days. The 3rd Generation Mobile Telephony Networks provide advanced cross-functional services for voice, data, and multimedia transmission, using broadband channels. The new European systems of mobile communications offer possibilities in addition to those of the 2nd Generation (GSM) systems. Indicatively, the increased data transfer speeds, the decreased delay in the data network response, and the increased network capacity are some of the advantages of the 3rd Generation systems. Moreover, they utilise the scarce resource of radio spectrum more effectively.

In this context, the European Commission has considered the possibility of developing 3rd Generation mobile telephony services using the 900 MHz band that is currently being used for the development of the 2nd Generation GSM services and networks.

As a result, the Committee proposed the abolition of the "GSM Directive"⁶⁴ and the publication of a new Directive⁶⁵, regarding the Regulatory Framework for radio spectrum policy in the European Union (EU).

The "GSM Directive" continues to be in force and currently

obliges the member states to allocate the entire 900 MHz band (890-915 MHz and 935-960 MHz) to mobile telephony networks of GSM technology.

In light of the forthcoming changes and in the context of its actions for the development of broadband mobile services in our country, EETT conducted a Public Consultation from July 7, 2008 to September 1, 2008 in order to take advantage of the views of the market and any other concerning party regarding the prospect of using other technologies besides GSM in the 900 and 1800 MHz bands. COSMOTE, VODAFONE, and WIND, the three Greek mobile operators, as well as ERICSSON, participated in the Public Consultation.

The main conclusion of the Consultation's answers was that all participants agreed that the development of broadband 3G mobile networks in the 900MHz and 1800 MHz bands must be a priority for Greece, given the important benefits that will have for consumers. It was pointed out that the abrogation of the existing restrictions in those two bands can add value to the Greek telecommunications market provided that the latter meets certain requirements. In the case of the 900 MHz band in particular, the majority of the participants supported the introduction of technologically neutral solutions immediately following the issue of the new relevant European Commission Directive.

4.1.2. Digital Television

In the context of the regulation for digital television and the smooth transition to digital television broadcasting and according to the provisions of the Law 3592/2007⁶⁶, the Joint

64. Directive 87/372/EEC of June 25, 1987, which was the initial basis for the development of the 2nd Generation mobile telephony networks.

65. By virtue of the Decision 676/2002/EC of the 7th March 2002 of the European Parliament and Council.

66. According to Law 3592/2007, GG Issue 161/A/20-08-2008, «Concentration and licensing of Media Companies and other provisions».

Ministerial Decision (JMD) of the Minister of Transport and Communications and the Minister of State for the «Frequency Map Configuration for the transition in terrestrial digital television broadcasting»⁶⁷ was promulgated in 2008.

This JMD, aiming at making the transmission of terrestrial digital television possible, determines:

- The geographic regions and the digital broadcast centres.
- The frequency channels of terrestrial digital television per geographic region and the relevant technical specifications.

The television stations that will broadcast their analogue program digitally during the transition period must submit to the Ministry of Transport and Communications (MTC) and EETT their technical broadcasting characteristics. According to the above JMD, EETT is responsible for monitoring and controlling the spectrum and the technical broadcasting characteristics of those television stations.

Antenna Parks

Moreover, in 2008 and in the context of its spectrum management competences and according to the aforementioned Law⁶⁸, EETT prepared a Draft Decision for the Regulation of licence granting regarding installation of radio communication stations, antenna constructions, and supporting equipment in Antenna Parks. This Draft was placed under Public Consultation from December 8, 2008 to January 8, and, among others, defined the following:

1. The process of granting a licence for the installation of radio communication stations, antenna constructions, and supporting equipment in specific places-points within the Antenna Parks; and the evaluation of the electromagnetic effects in relation to the broad population and the employers of the Antenna Park.
2. The specifications for antenna constructions for analogue television and free reception radio broadcasting; and for terrestrial digital broadcasting in order to achieve their most effective operation.

This Decision will be applicable to the installation of antenna constructions, transmitters, and supporting equipment

in specific places within the Antenna Parks that belong to providers, who are entitled by Law to settle or to be accommodated within the Antenna Parks and particularly:

- a) Providers of networks for the transmission of terrestrial analogue broadcasting signals⁶⁹.
- b) Providers of networks for the transmission of terrestrial digital broadcasting signals⁷⁰.
- c) Providers of services offering distribution of radio-television broadcasting signals.
- d) Providers of Electronic Communications services⁷¹.

The relevant Regulation is expected to become effective during the first quarter of 2009.

4.1.3. National Frequency Allocation Table Modification

In 2008, EETT participated in the procedures for the revision of the National Frequency Allocation Table (NFAT), a responsibility which, according to Law 3431, lies with the MTC.

The revision aimed mainly at adapting the Greek legislative framework to the recent Decisions of the European Commission on radio spectrum issues. The main points of this revision regarded:

- The addition of mobile service in the 3.4-3.8 GHz band.
- The addition of terrestrial broadband Electronic Communications in the 2.6 GHz band.
- The possibility of using new short range devices (see sub-section 4.5.2.).

The revision of the NFAT was completed with the promulgation of its modification in the Official Government Gazette⁷².

Subsequent to this revision, EETT promptly initiated the preparation for updating and respectively revising the «Regulation of Terms of Use of Individual Frequencies or Frequency bands» in order to include the procedures governing the granting rights of use. The revision is expected to be completed at the beginning of 2009.

67. JMD 21161, GG Issue 1680/B/20-08-2008.

68. Article 11 paragraph 18 of Law 3592/2007.

69. According to the stipulations of Law 3592/2007, article 6, paragraph 3; and article 8, paragraph 3.

70. According to the stipulations of Law 3592/2007, article 13.

71. Subject to the terms of Law 3431/2006, article 4, paragraph 15.

72. GG Issue 1979/B/24-09-2008.

4.1.4. Planning the deployment of EETT Offices in the Region

In 2008, EETT decided⁷³ to design a plan through which it would implement the expansion of its offices in the Region with a view to monitoring the spectrum effectively, throughout the Greek Territory.

The plan includes: establishment of two Regional offices in Patra and Iraklio of Crete -in addition to the already existing offices; supply and installation of the monitoring equipment necessary and having them manned by appropriate personnel. Furthermore, the plan also includes the development of stations for spectrum supervision and monitoring in selected regions where use of the spectrum is intensive.

Prior to the implementation of the works described above, the plan must receive approval by the Minister of Transport and Communications and the personnel necessary must be located.

4.1.5. Determination of Radiofrequency Usage Fees in fire-stricken areas

In 2008, in collaboration with the Public Authorities which are jointly responsible, EETT promulgated a Regulation⁷⁴ in order to take relief measures benefiting the users of radiofrequencies in radio communication stations which are legal operators and are based in the areas struck by the fires of June, July, and August 2007.

These particular measures mainly regarded the networks used for the transfer of radio and/or television program from the production point to the transmission point as well as the Private Mobile Radio (PMR) Networks of radio-taxi and private security companies.

The Regulation stipulates that the annual fees paid by those radio communications stations for making use of the radiofrequency spectrum should decrease by 80%. This favourable regulation is applicable for the years 2008, 2009, and 2010 under particular terms and requirements that are mentioned in the relevant Regulation. Consequently, specific categories of companies are able to receive economical facilitations for the radiofrequencies they use.

4.2. Radio Frequency Rights of Use and Spectrum Monitoring

4.2.1. Fixed Service

The Fixed Service includes wireless networks of Electronic Communications at specific, fixed points. With regard to the needs these networks meet, there are two categories:

- Providing Electronic Communications services to the public.
- Meeting the public's private telecommunications needs.

In the majority of cases, operation of those particular networks requires that they have been granted the relevant Radiofrequency Right of Use. During 2008, they were granted:

- 2,704 new Radiofrequency Rights of Use for point-to-point links that mainly concerned backbone networks of companies that provide Electronic Communications services.
- 84 Radiofrequencies Rights of Use to meet private telecommunication needs, mainly for the transmission of radio and TV programs from production point (studio) to transmission point.

As far as the legality control and the interference problems in fixed service systems were concerned, EETT received 27 complaints in total:

- 4 regarding legality control and interference problems in wireless access systems (WiFi and WiMAX).
- 16 regarding interference control in licensed radio links of radio-TV stations.
- 3 regarding legality control of radio links of radio-TV stations.
- 4 for legality control of radio links of mobile telephony companies.

Moreover, EETT conducted throughout the Territory an extensive inspection of radio link signals transmitted in the frequencies up to 3 GHz. The inspection located illegal broadcasts of radio links for the transmission of radio and TV station signal to frequency zones that had already been assigned to GSM/ DCS/ UMTS mobile telephony services and to the development of defence systems and aeronautic navigation systems.

73. EETT Decision 467/073/08-02-2008 «Spectrum Monitoring Expansion in the Region».

74. EETT Decision 481/018/20-05-2008 «Regulation of Determination of Radiofrequency Spectrum Use Fees for Legal Stations of Radio Communications Installed in Areas affected by the Fires in the year 2007 and operating on a Permanent Basis».

EETT addressed recommendations to those specific stations to cease operation of those radio links and apply to EETT for the granting of Radiofrequency Rights of Use. The majority of them complied with EETT requests while the foreseen administrative penalties were imposed on the remaining ones.

Moreover, EETT sent to the Television and Radio Station Unions of the Greek Territory a letter containing information which regarded the problems that are created by the use of non-licensed radio links for the transfer of radio and television station programs. The information also regarded the process of receiving a right of use for the appropriate frequency within the bands that are defined by EETT's Regulation of Terms of Use of Individual Frequencies or Frequency bands. The Television and Radio Station Unions were asked to inform their members accordingly.

Measurement Campaign in the Super High Frequency (SHF) Band

In May 2008, EETT participated via a specific unit and a mobile monitoring station in the 2nd European measurement campaign in the super high frequency (SHF 3,000-30,000 MHz) band. The campaign took place in Rambouillet, France. Besides EETT, the Regulatory Authorities of France, Germany, the United Kingdom, Belgium and Netherlands also attended this meeting. During the meeting, the characteristics for the metric provisions and the mobile monitoring stations that are used in the SHF frequency band were determined, while the International Telecommunications Union (ITU) will employ many of the meeting's conclusions to enrich its recommendations. Furthermore, there were carried out measurements of frequency, power, band width and, signal polarisation emanating from Satellite News Gathering (SNG), vehicles of television stations, micro wave links of base stations of mobile communications systems and of the satellite station Eutelsat.

4.2.2. Mobile Service

Mobile Telephony Networks

The mobile telephony networks include wireless digital systems of sound and data transfer that use the GSM/DCS/UMTS cellular technology whose operation requires the granting of a Right of Use by EETT.

In 2008, EETT received 119 complaints relating to interferences in the spectrum assigned to Mobile Telephony Operators (MTO) and particularly in the reception frequencies of base

stations communicating with mobile telephones. Out of those complaints, 37 regarded interference problems in the Attica Prefecture, 12 in the Thessalonica Prefecture, and the remaining 70 related to other Prefectures of Greece.

With regard to the Attica Prefecture complaints, technical units of EETT carried out inspections and measurements and proceeded to actions that resolved the majority of interference problems. EETT's inspection did not encounter any problems in 13 cases while in 3 cases it was ascertained that the interference problems were attributed to systems that impeded the use of mobile telephony devices (Jammers) and were used by government institutions for security reasons. EETT informed in writing the MTC on the above matter and asked for its regulatory intervention in order to consider whether to promulgate a special directive or regulation governing installation and use of "Jammers" by government institutions. The above will be included in the necessary technical specifications of the particular devices in order to reduce to the maximum the negative repercussions of the mobile telephony services, localizing the action of those systems in the area of interest.

With regard to the sum total of the Thessalonica Prefecture complaints, technical units of EETT carried out inspections and measurements and took actions that resolved the majority of the relevant problems. EETT's inspection did not detect any problem in 9 cases while in 3 cases it was ascertained that the interference problems were attributed to interference signals.

With regard to the 70 complaints that related to the remaining Prefectures, EETT conducted technical inspections for 37 of them, according to the importance they had in the smooth operation of mobile telephony networks. EETT's inspection did not encounter any problems in 12 cases while in the remaining ones EETT took the appropriate actions for their resolution. Furthermore, 20 complaints were withdrawn before their examination as temporary and of short duration while 11 of the complaints were not inspected and are still pending.

Generally, the main sources of the interferences were:

- Radio link systems for sound, picture and/or data transfer from radio and TV stations and military institutions.
- Systems impeding the use of mobile telephony devices (Jammers).
- Interference transmissions from broadcasting radio and TV stations.
- Interference transmissions from domestic systems of television signals amplification.

Private Mobile Radio Networks of Non-Governmental Services

According to Law 3431/2006, the PMR licences fall under the category of General Licences granted by EETT. The latter is also responsible for granting the frequencies rights of use to the owners of PMR Networks, with the exception of Prefectural Authorities, Ministries, Embassies, the National First Aid Centre (EKAV) and other government agencies.

In 2008, a total of 282 applications for PMR Networks were submitted, regarding either new ones or the modification of the existing ones. In 220 of the above cases a Radiofrequency Right of Use was granted or the existing one was modified. Those cases included also 10 requests for the temporary Radiofrequency Rights of Use for sports and other events.

During 2008, EETT received 23 complaints for interferences in the PMR Networks of radio taxi co-operatives, Municipalities, and private companies. The majority of them were due to the use of non-licensed radiofrequencies and the interference broadcasts of other PMR networks. Additionally, during 2008, EETT received 20 complaints of private individuals regarding the legality of PMR antenna systems as well as inspections for interferences in remote control systems and in domestic electronic appliances.

In the majority of the above cases, technical inspections were carried out, the necessary actions to resolve the problems were promptly scheduled, and the sanctions foreseen were imposed where necessary.

4.2.3. Obligations of Fixed and Mobile Service Providers

According to the provisions of Law 3431/2006, EETT converted the Individual Licences of fixed and mobile operators to Radiofrequency Rights of Use in 2007. The Rights of Use for fixed service were granted to 4 companies⁷⁵ in the 3.5 GHz band and to 5 companies in the 25 GHz band⁷⁶ while the ones relating to mobile service were granted to 4 companies⁷⁷.

These Rights include terms regarding: the obligations that the provider should satisfy at the physical level (percentages of geographical and demographic coverage); the quality of service, such as the probabilities of call blocking and interruption; the network availability; the time of the service termination; and the obligation of co-location.

The owners of Radiofrequency Rights of Use for mobile service are obliged to submit to EETT twice a year reports on

the network expansion, which should also include data for the aforementioned parameters. Regarding the fixed service, they are obliged to submit to EETT annual reports on the network expansion and modernisation. Every semester they must also notify the EETT of the locations of their installed stations as well as of their technical characteristics.

In 2008, EETT examined the reports of the network expansion that were submitted by the mobile operators for the second semester of 2007 and the first semester of 2008. With regard to the basic parameter of radio coverage, the conclusion reached from the reports was that all mobile operators have fulfilled their obligations relating to the 2nd and 3rd Generation network.

At the same time, the reports for the network expansion of the fixed operators were also examined. Those reports included the data for the second semester of 2007. According to the content of the reports, those operators appeared to satisfy the basic parameter of radio coverage. EETT initiated the radio coverage inspection by using both theoretical models and sampling inspections of the operators' base stations. The inspections will also continue in 2009.

4.2.4. Satellite Services

In order to avoid interferences, the installation and operation of the terrestrial satellite stations requires national and international coordination with the existing networks of fixed and satellite service. In this context, EETT implemented the procedures foreseen by the International Telecommunication Union (ITU). It also harmonised during 2008 the domestic and foreign satellite stations with the existing wireless networks.

The majority of VSAT topology satellite stations in virtue of EETT Decision⁷⁸ do not require the granting of Radiofrequency Rights of Use, provided that certain terms and requirements that are mentioned in this Decision are fulfilled. The simplification of the procedures introduced by this settlement contributes considerably to the development of broadband infrastructures in the country.

During 2008, a receiving terrestrial satellite station for the collection of meteorological data and two terrestrial satellite stations for the Civil Aviation Authority (CAA) were licensed in collaboration with the MTC.

Moreover, 3 requests were submitted by the European Regulatory Authorities (ERA). They related to the coordination of terrestrial satellite networks either with fixed service networks or with the national satellite network HELLAS SAT.

75. COSMOTELCO, CRAIG, OTE, WIND.

76. COSMOTE, FORTHNET, TELLAS, VODAFONE, WIND.

77. COSMOTE, VODAFONE, WIND, OTE.

78. EETT Decision 399/034/16-08-2006, «Regulation on Terms of Use of Individual Frequencies or Frequency bands», GG Issue 1456/B/03-10-2006.

The requests that demanded the coordination with the satellite network HELLAS SAT were forwarded to the MTC.

Additionally, in 2008:

- 1 radiofrequency right of use for a terrestrial satellite station of an Electronic Communications provider was granted.
- 4 new rights of use for the Ku radiofrequency band in terrestrial satellite stations SNG were granted to a television station of national coverage. These rights were granted in collaboration with the CAA and the Hellenic National Defence General Staff.
- 2 radiofrequency rights of use that had been granted to terrestrial satellite stations SNG were modified so that they may come under the same terms for radiofrequency use in the band in question.
- 1 radiofrequency right of use in terrestrial satellite station was renewed.

As far as the spectrum management and monitoring was concerned, 5 complaints were submitted to EETT in 2008. Out of those, 3 regarded interferences in satellite systems of data reception from the National Observatory of Athens, the European Organisation of Satellite Communications (EUTELSAT), and the Ministry of National Education and Religious Affairs (MNERA), respectively while the remaining 2 regarded interferences with Global Positioning Systems (GPS). Most problems were caused by terrestrial radio links of fixed service which interfered in the terrestrial satellite receivers. EETT promptly proceeded to the necessary inspections and measurements for the resolution of these problems while, from time to time, it conducted regular inspections of that specific band frequency.

4.2.5. Ancillary Services to Broadcasting and Program Making

The ancillary services to broadcasting and program-making constitute an important category of services. The coverage of a sporting event; an outdoor performance; or other special events are all examples of those services. Coverage of those events requires radio equipment such as wireless cameras and microphones, as well as portable microwave links and systems of voice transmission. The transfer of radio-TV program from the production point to the transmission point is accomplished via an outside broadcasting vehicle (Electronic

News Gathering/ENG/Outside Broadcasting -OB) for short distances or via a SNG vehicle for long distances.

In 2008, following relevant requests, temporary Radiofrequency Rights of Use with a maximum duration of 2 months were granted to 6 SNG stations. They mainly concerned portable satellite picture and sound transmission stations from international users for the coverage of small sporting events during the preliminary rounds of the Champions League.

According to EETT's «Regulation on Terms of Use of Individual Frequencies or Frequency bands»⁷⁹, the wireless microphones and systems of in-ear monitors are excluded from the granting of radiofrequency rights of use, provided that particular terms and requirements of the above Decision are met (such as maximum effective radiated power: erp 10 mW). This specific regulation facilitates the users of the above applications. Nevertheless, in cases where there is high concentration of such systems in a specific space and in order to avoid harmful interferences appearing among the users, EETT provides licensing of the above systems, with the users' consent.

4.2.6. Radio and Television

With regard to radio-television issues, EETT has been responsible since 2007⁸⁰ for spectrum monitoring and the granting of the Radiofrequency Rights to:

- Analogue national television stations (T/S), at locations not reported to the National Council for Radio and Television (NCRTV)⁸¹.
- Analogue regional and local T/S following the relevant application submitted by the interested parties⁸².

The above competence for granting rights of use is temporary and expires with the publication of JD by the Minister of Transports and Communications and the Minister assigned with the responsibilities of Press and Mass Media, regarding the configuration of Frequency Maps for the analogue and/or digital television.

During 2008 and in implementing the above, EETT:

- Promulgated a Regulation⁸³ with regard to the procedure that will be followed for the submission and the examination of applications for the granting of Channels Frequency Rights of Use to the above stations.
- Gathered, in collaboration with the NCRTV, the technical

79. EETT Decision 399/034/16-08-2006, GG Issue 1456/B/03-10-2006.

80. According to article 9 of Law 3548/2007: «Listing of governmental bodies' publications in the regional and local Press and other issues».

81. According to article 4 of Law 1866/1989.

82. Which meet the terms and the requirements of article 17 of Law 2644/1998.

83. EETT Decision 472/157/21-03-08, GG Issue 711/B/2008 «Regulation of Granting Rights of Channels Use in T/S which hold licenses of foundation and operation as defined in article 4 of Law 1866/1989 and in Local and Regional T/S that fulfil the conditions and the requirements of article 17 of Law 2644/1998 and the framework of use of these in implementation of Law 3548/2007».

characteristics for the broadcasts of the legally operating national, local, and regional T/S and via this data updated the National Register of Radiofrequencies, producing for the first time a frequencies register for television broadcasts.

- Accepted, in the framework of the Regulation's implementation, applications for the granting of 231 rights for new broadcasting locations of analogue T/S. Out of those applications, 74 were not examined or were rejected because the granting of the requested broadcasting locations does not lie with the implementation scope of the Law in question.

With regard to spectrum monitoring, EETT imposes the foreseen⁸⁴ administrative sanctions on radio-TV stations concerning the following matters:

- Illegal use of frequency spectrum from legal radio-TV stations; non-compliance with technical characteristics for broadcasting; or interferences in other legal users⁸⁵.
- Use of non-licensed fixed or mobile transmission links for programs of radio-TV stations.
- Illegal (non-licensed) installation of relevant antenna constructions⁸⁶.

Given that the licensing of TV and radio stations as well as the organisation of Antennas Park at locations that constitute transmission centres (see sub-section 4.1.2.) are still pending, the situation in the realm of Greek radio-TV remained the same as in previous years, resulting in the following:

- A number of cases of illegal broadcasting, both in urban centres and the Region, especially from non-licensed installations at broadcasting centres.
- Mutual interferences between TV and radio stations.
- Harmful interferences with air navigation services.
- Interferences with other services and spectrum uses.

EETT performs regular inspections and provides for the resolution of the interference problems in its effort to terminate illegal broadcasts and in collaboration with the competent police, judicial and administrative Authorities.

Furthermore, it has been repeatedly pointed out that: the

licensing of radio and TV stations based on harmonized frequencies maps; and the organization and inspection of the infrastructure of those stations at broadcasting centres, are indispensable in safeguarding the legal and efficient use of broadcasting spectrum as well as in protecting the legally operating users from interferences.

Complaints

In 2008, EETT received 907 complaints regarding interferences, illegal broadcasts, and illegal radio-TV station installations that called for its intervention. Those complaints related to:

- 85 radio stations in Attica, 46 radio stations in the Thessalonica Prefecture, and 400 stations in the Region.
- 73 TV stations in Attica, 37 television stations in the Thessalonica Prefecture, and 144 stations in the Region.
- 70 inspections into antennas and broadcasting centres in Attica, 12 in the Thessalonica Prefecture, and 42 in the Region.

EETT investigated the majority of the above complaints while, for some cases related to problems in remote areas and away from the two EETT offices (in Athens and Thessalonica), EETT requested the collaboration of the cases' respective Prefectural Authorities.

In the context of EETT's new responsibilities regarding the monitoring and the inspection of radio-TV broadcasts, the findings of the above investigations were evaluated based on the legality lists and the technical specifications provided by the NCRTV and the legislation and EETT summoned the offending stations to comply.

In the cases of the TV and radio stations that, according to NCRTV Decisions, operated illegally, EETT informed the respective Public Prosecutor and Police Authorities in writing so that the anticipated penal procedures may be applied. Similarly, in collaboration with those authorities, EETT undertook a number of operations to terminate illegal transmissions. During those operations the following were confiscated:

- 31 radio stations and 12 TV stations, and 1 wireless camera in Attica.
- 18 radio stations, 1 TV station, and 4 radio electric links of radio-TV stations in the Region.

84. From article 63 of Law 3431/2006.

85. Reading of the provisions of article 11 paragraph 3, article 4, paragraph 2, 11, and 12 verses VI, XVIII, XIX, and XX of Law 3431/2006, which are proportionally applied to article 11 paragraph 3, verses VI, III and article 16 of Law 3592/2007, «Concentration and Licensing of Mass Media Companies and other provisions», GG Issue 161/A/2007.

86. Article 12, verse XXXII of Law 3431/2006 as modified by the provisions of Law 3534/2007 «Establishment of Authority for the distribution of the available use time in the Greek airports and other provisions», GG Issue 40/A/23-02-2007 and specifically article 24, paragraph 2 and article 1, paragraph 5, verse III of Law 2801/2000.

Drawing up a List of the Radio and Television Stations throughout the Greek Territory

The imprint of the broadcasting centres and the frequencies used by radio and TV stations throughout the Greek territory constitutes –due to the lack in licensing– a significant tool for the management and monitoring of the broadcasting spectrum.

In 2008, EETT's technical units carried out inspections in 15 Prefectures out of Attica. The results that were recorded were forwarded to the NCRTV, which is the competent NRA for investigating the legal operation of radio-TV stations. Based on the recorded findings of the inspections, the total number of privately-operating radio stations per Prefecture was found to be on average triple or in some cases quadruple the number of broadcasts specified in the Frequencies Maps. Such practices result in the increased possibility of the legal users of the spectrum being subject to harmful interferences. They also result in a decrease in the quality of the provided service.

In addition to the aforementioned investigations, EETT carried on with the task of updating the imprint of radio-TV broadcasts installations at broadcasting centres in the regions of Attica and Thessalonica. The goal of this action was for EETT and all other competent bodies to form a complete picture of the existing situation in the broadcasting centres of Athens and Thessalonica and thus deal with the problem of harmful interferences in those areas directly and efficiently.

At the illegal broadcasting centres of radio and TV stations located in the area of Pirovolia on Mount Egaleo, on Mount Pikilo, and on Tourkovounia, EETT, providing technical support and in collaboration with the Athens and Piraeus Prosecutor's Office as well as with the Police, proceeded to a series of repeated inspections of the Radio and TV broadcasting installations in question. Those operations resulted in the repeated termination of all illegal broadcasts, in the confiscation of all illegal active equipment, and in the dismantling of the relevant antenna systems by the competent Authorities. At the same time, the Public Power Corporation (DEI) was informed about the findings of the inspections so that it could then cut the power off at any facility belonging to illegal users.

Regarding the Thessalonica region, EETT completed the inspections aiming at imprinting the broadcasting positions of the radio and TV stations at the Chortiatis broadcasting centre precisely and forwarded the relevant findings to the Police, as well as to other co-competent Services (Forest Inspection, Urban Planning Department) so that those agencies may proceed with the necessary actions.

4.2.7. Air navigation and Remaining Networks of Government Services

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

The CAA faces most of the interference problems by state networks, since the air navigation spectrum (108 - 137 MHz) abuts on the FM radio broadcasts band (87.5 - 108 MHz). Most of the interferences that appear in those networks are caused by a lack in technical specifications regarding both the operation frequency and other important broadcasting parameters, which is the result of a lack in licensing.

In its effort to deal with these problems, EETT monitors the air navigation spectrum throughout the Greek Territory on a permanent basis. The inspections are performed with the assistance of Fixed Monitoring Stations (FMS), which have been installed by EETT at Athens International Airport (AIA) and at the airports of Iraklion and Rhodes, as well as with the assistance of Mobile Monitoring Stations (MMS) which is necessary for areas outside Attica and Thessalonica.

During 2008, there were interference problems, in the following wireless systems of CCA:

1. Communication systems of Area Control Service (telecommunication centres).
2. Communication systems of airports.
3. Radio aids.

Moreover, in 2008, EETT received 206 complaints regarding interferences in the CAA's wireless systems, out of which 48 related to interferences in the flying aircraft communication receivers, 149 related to terrestrial communication receivers, and 9 to radio aids.

EETT acted promptly and resolved all the cases with regard to terrestrial receivers and radio aids. As far as the interferences in the airplane receivers are concerned, EETT acts in collaboration with the CAA due to the flying means the latter possesses.

The licensing of the radio-TV stations in the Territory along with the consequent imposition of rules regarding land planning and monitoring of antenna installations in the broadcasting centres are two factors that are expected to decrease the interference problems the CAA has been facing.

The cases of interference in the operation frequencies of the

remaining government safety and emergency networks that were submitted to EETT during 2008 were a total of 8, were examined in order of priority, and were resolved immediately. Specifically, EETT received 2 complaints from the Hellenic Ministry of Mercantile Marine, the Aegean and Island Policy; 1 from the FD; 3 from the Hellenic Air Force; 1 from the Hellenic Navy; and 1 from ELAS. Moreover, there were interferences in a frequency that has been assigned exclusively to the CAA and relates to the wireless interconnection system of remote station radio aid to AIA.

In relation to interferences in systems relating to the protection of human life and public safety at the international level, 2 complaints were submitted to EETT: 1 for the air navigation from the Regulatory Authority of the United Kingdom; and 1 for the marine from the Regulatory Authority of France.

4.2.8. Radio Amateurs

In 2008, the EETT received 16 complaints, for interferences in the radio amateur communication systems and for legality control of the relevant antenna constructions. The majority of the problems that were investigated and resolved by EETT had to do with the illegal broadcasts from electrical or electronic apparatuses as well as from the interfering broadcasts of radio-TV stations and illegal frequency use.

4.2.9. Rights of Use for Athletic Events

The 2008 Marathon

EETT's actions for managing and monitoring of the spectrum covering the needs of the Athens Marathon on November 9, 2008 were exceptionally successful.

EETT, in cooperation with the company responsible for the coverage of the Marathon, granted temporary radiofrequency rights of use with the following distribution per service:

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

The monitoring stations of EETT conducted precautionary inspections and measurements in the Attica Prefecture in order to ensure the smooth and unobstructed use of the requested frequencies.

4.3. Equipment for the Improvement of Employee Safety

The personnel of the Spectrum Directorate, in the context of its duties in spectrum management and monitoring, is required to work in areas where many stations and antenna broadcasting constructions are concentrated and increased levels of electromagnetic fields are observed. The Spectrum Directorate undertook and completed the following actions in order to safeguard and protect personnel from its Spectrum Monitoring and Management Departments:

1. Training of the personnel in the non-ionizing electromagnetic fields. The training was conducted by the «Dimokritos» Institute's Greek Atomic Energy Commission and took place from 19-11-2008 to 14-12-2008.
2. Supply of equipment for the protection from non-ionizing frequencies. The supply included equipment of two categories:

- Category 1: Certified uniforms which cover the bodies of employees entirely and protect them from the magnetic and electric fields generated in the frequency area of all the systems that are monitored by EETT (e.g. radios, mobile telephony, radar etc.). The factor of exposure reduction that the uniforms offer is higher than 10.
- Category 2: Specialized apparatuses for measuring the non-ionizing radiation amplitude. This category entailed the supply of two kinds of instruments. The first type relates to the individual meters carried by each employer warning him/her of the level of the fields according to the defined legislated limits. The second type relates to instruments taking accurate measurements of the fields' amplitude.

4.4. Antenna Mast Constructions

4.4.1. Licensing of Antenna Mast Constructions

During 2008, 1,700 applications for new antenna mast constructions licensing were submitted to EETT. Out of these cases, 260 were granted and 94 were rejected. At the same time, 272 licenses of antenna mast constructions were revoked for various reasons.

The remaining applications were characterized as "pending" in part because the submitted files that accompanied them were incomplete but mainly because they lacked the necessary Environmental Terms Approval (ETA). The examination of

the aforementioned applications requires that the files be completed with the inclusion of the ETA⁸⁷, required by the relevant Law.

Moreover, the current antenna mast constructions –under the Decisions either of EETT or the MTC- should be adapted to the environmental requisites and the new radiation limits for public safety within the defined deadlines, according to Law 3431/2006. To this end, 350 applications for confirmation of licence validity were submitted by the MTO, 252 applications received positive Decision by the EETT, while 78 applications were rejected, and 20 applications, submitted at year's end, are still pending.

4.4.2. Illegal Installations of Mobile Telephony Antennas

In 2008, EETT received 895 complaints relating to mobile telephony antenna constructions. In the aftermath of a thorough investigation, it was ascertained that 588 cases related to licensed antennas, for the legality of which the complainants were informed.

The remaining 307 cases concerned non-licensed constructions. EETT's technical units performed in total 209 autopsies at mobile telephony base stations, 128 of which were performed within the region of Attica and 61 outside the region of Attica, while 39 inspections were held by the Regional Office of Thessalonica. With regard to 20 cases inspected outside the region of Attica the autopsies were performed by the competent Prefectures.

Regarding the cases of non-licensed antenna constructions for which autopsies were performed, the procedure for imposing administrative sanctions was put into motion. During 2008, administrative fines were imposed on 82 cases involving non-licensed antenna constructions.

4.5. Compliance of Radio and Telecommunication Terminal Equipment

4.5.1. European Notifications Application

With a view to facilitating the circulation of new equipment in the European market, the EU developed a central system

for the submission of Notifications which is based on the application «One-Stop Notification (OSN)». In 2008, having recognized the benefits of this application, EETT incorporated it in the procedure of acceptance and examination of radio equipment notifications and proceeded to the relevant modification of its Notifications Regulation⁸⁸.

When using this new application, each person or organisation that is interested, registers via the Internet the equipment's data in a central database that EU maintains while the competent agencies of each member state are notified via e-mail message. EETT examines each notification and if it detects a discrepancy with the NFAT, the Regulation for the Terms of the Radiofrequency Use, and the relevant radio interfaces, it informs the interested party via a letter.

This process changed the manner in which the established notifications management worked, facilitating both the notification institutions and EETT, by considerably decreasing the volume of incoming and outgoing documents, simplifying the bureaucratic procedures, all the while providing the opportunity of using a central database with complete control of notifications (common format, easy search, and automatic answer for the majority of notifications).

4.5.2. Short Range Devices

A significant section of the RTTE market is occupied by an important category of radio equipment, the Short Range Devices (SRDs). This category includes devices of data transmission, alarms, games with remote controls, Bluetooth, local wireless networks equipment, etc. The use of SRDs is regulated under the Presidential Decree (PD) 44/2002⁸⁹, the NFAT⁹⁰, and its recent revision⁹¹ (see sub-section 4.1.3.).

According to the above revision, the use of FM micro transmitters, Tank Level Probing Radars and Ultra Wide Band (UWB) devices is henceforth allowed in Greece. The UWB devices include those that provide wireless video transmission for home theatre systems and digital television, safety and car navigation systems, etc.

4.5.3. Market Surveillance

EETT performs regular inspections of the RTTE market, in order to protect consumers from illegal equipment and

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

88. EETT Decision 473/08/28-03-2008, GG Issue 933/B/2008.

89. «Radio equipment and telecommunications terminal equipment and the mutual recognition of their conformity - Transposition of the Greek legislation to Directive 99/5/EC of the European Parliament and of the Council of March 9, 1999», Official Government Gazette 44/A/07-03-2002.

90. GG Issue 399/B/03-04-2006.

91. GG Issue 1979/B/24-09-2008.

prevent possible harmful interferences. In this context, EETT monitors whether the equipment placed on the Greek market complies with the requirements set by the relevant legislative framework⁹².

To this end, EETT conducted 10 inspections into companies that maintain RTTE and examined 28 samples of equipment that belonged to different RTTE categories. The administrative and/or technical inspection revealed in the majority of cases (26 samples) non-compliance with the essential requirements of PD 44/2002. On those cases and following the relevant Hearings held, EETT imposed either recommendations or fines.

Furthermore, since September of 2008, EETT has been participating in the 3rd European Campaign of Market Surveillance that will last till June 30, 2009. The goal of the campaign is to reach useful statistical conclusions about the compliance of RTTE at the European level and to schedule information actions (e.g. training seminars, workshops), organized either by the EU or the NRA in case there is need to strengthen the compliance with Directive 99/5/EU.

Publication of the Market Surveillance Guide

In order to facilitate those members of personnel that conduct inspections within the framework of surveying the RTTE Market and in compliance with the directives of ADCO (Administrative Cooperation Group under the RTTE Directive), EETT drew up a Market Surveillance Guide. The latter is complementary to the «Blue Guide» of the European Commission⁹³ which provides a general review of principles that regulate the RTTE market Surveillance and the responsibilities of the EU member states.

Specifically, the Market Surveillance Guide entails references to the Decisions of the European Commission and the Telecommunications Conformity Assessment and Market Surveillance Committee (TCAM), clarifies issues that have caused difficulties to market surveillance personnel, and describes the sequence of the activities entailed in the Safeguarding Measures procedure. The safeguarding Measures relate to actions at the legal level (e.g. sanctions) that are followed by the Market Surveillance Authority when it locates a piece of equipment that does not comply with Directive RTTE.

4.6. EETT Controlling and Monitoring Actions

SUBJECT	NUMBER OF HEARINGS	FINES	RECOMMEN-DATIONS	EXEMPTIONS	OTHER SANCTIONS / DECISIONS
Mobile Telephony Antennas	82	80		2	
Remaining Antennas Constructions	12	2	7	3	
Terminal Equipment	14		13		1 filing
Use of non-Allocated Radiofrequencies for the Operation of Radio Links ⁹⁴	23	1	22		
Monitoring of Radio & Television Stations ⁹⁵	11		11		
TOTAL	142	83	53	5	1

Please note that the Decisions on the Hearings of EETT are subject to judicial control in accordance with the applicable Law.

92. Presidential Decree 44/2002.

93. «Guide for the Implementation of Directives Prepared on the basis of the Provisions of the New Approach and the Spherical Approach», http://ec.europa.eu/enterprise/newapproach/legislation/guide/document/alchapters_el.pdf.

94. Radio and Television Stations/OTE.

95. Technical characteristics of transmission, interferences.

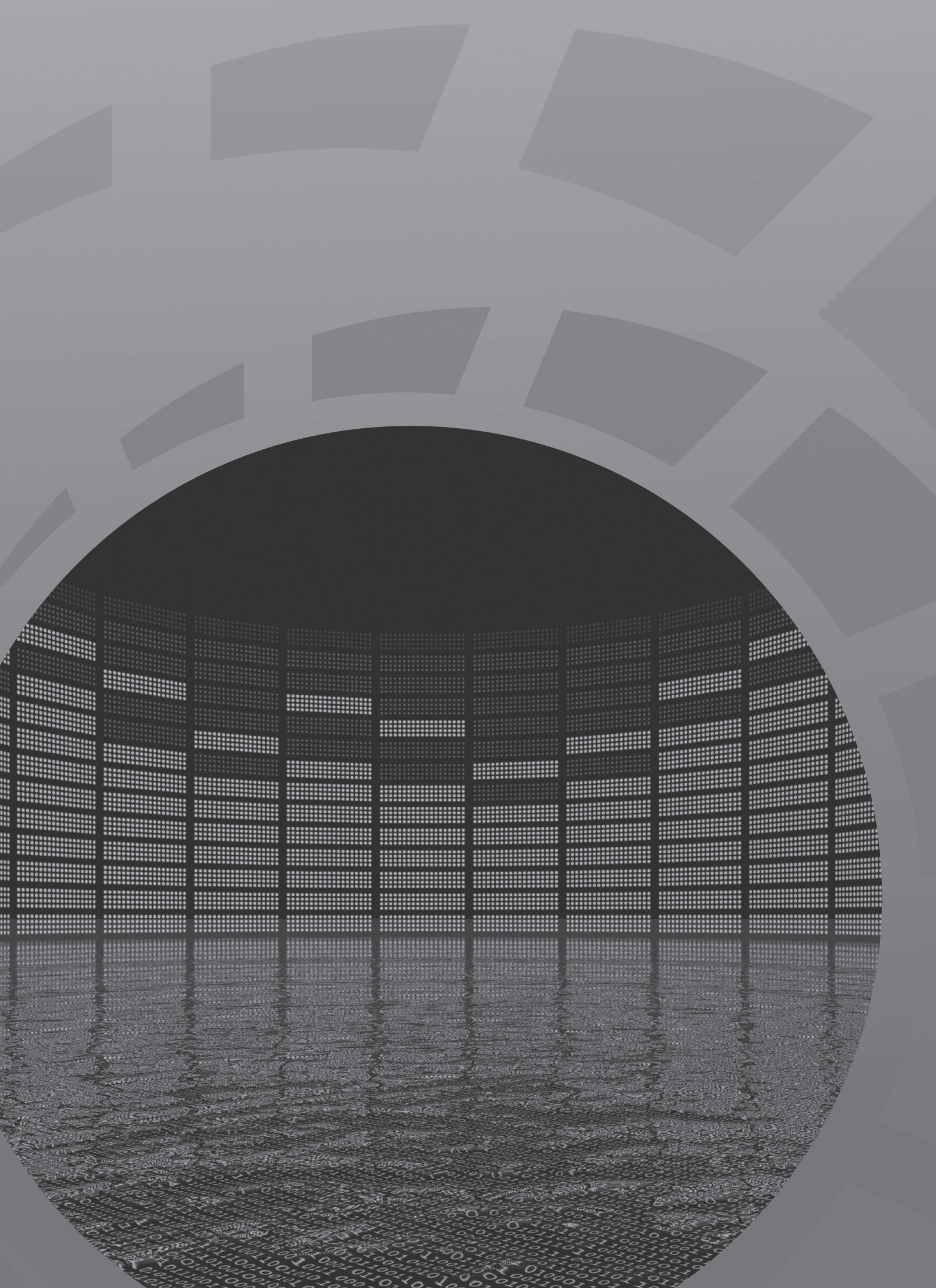
4.7. Goals

As far as the radiofrequency spectrum is concerned, the main strategic keystones of EETT are the following two:

1. Improvement of spectrum availability and support of competition.
2. Optimal technical and economic spectrum management.

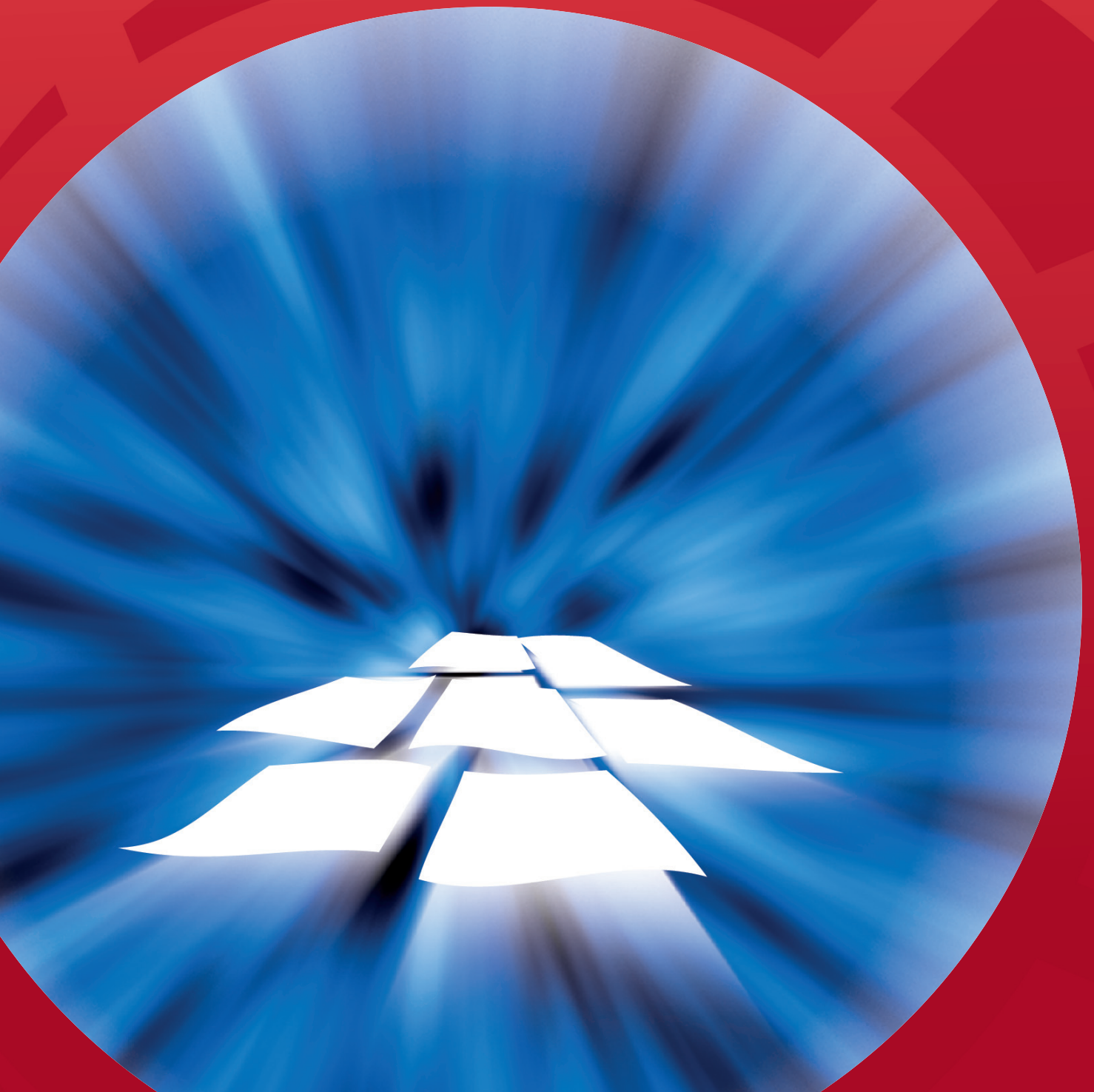
Based on the aforementioned strategic keystones, the actions of EETT for 2009 with regard to spectrum issues will focus on implementing the following goals:

- Lifting the restrictions governing current radiofrequency rights of use, regarding technology in use and/or the provided services.
- Distribution of new spectrum bands for use, in the aftermath of an evaluation of the market needs.
- Re-evaluation and re-configuration of the technical allocation criteria in order to achieve a more efficient use of spectrum.
- Safeguarding the implementation of the terms for the rights of spectrum use via effective management and monitoring. Geographical expansion of spectrum monitoring by deploying new regional offices and establishing new monitoring stations.
- Simplification of the licensing procedures by forming a more flexible regulatory framework, in collaboration with the competent agencies.
- Faster and more effective response to requests made by spectrum users by introducing an electronic procedure for submitting the requests.
- Shaping the website of EETT as an effective information node for current and future spectrum users.





5. Postal Services Sector



In 2008, the legislation for providing Postal Services was revised. After conducting a Public Consultation and taking into account the views and opinions of the interested parties (consumers, postal service providers, and state officials), EETT promulgated a new Regulation of General Authorization and, at the same time, submitted to the Ministry of Transportation and Communications (MTC) proposals regarding the re-evaluation of Law 2668/1998 so that the Law may be harmonized with the 3rd Postal Directive.

Moreover, during 2008, EETT intensified monitoring of the market, through a series of scheduled and unscheduled inspections of postal operators registered and unregistered with EETT's Postal Registry. The purpose of those inspections was to verify whether the operators complied with the current legal framework and to take the appropriate measures where necessary.

5.1. The Greek Postal Market and Actions taken by EETT

5.1.1. Liberalization Process

The 3rd European Postal Directive (2008/6/EC) brings the Postal Services Sector into full liberalization. In 16 out of 27 member states (representing 95% of the market), the full opening of the market will take place on January 1, 2011, while in the remaining 11 member states (with Greece among them) it will take place on January 1, 2013.

In order to accomplish a provision of Universal Service (US) that would be more effective and of better quality, the new Postal Directive gives member states the authority to designate more than one operators as Universal Service Providers (USPs) taking into account the scope and the geographical area the services provided by future USPs must cover.

One of the basic amendments introduced by the new Directive is the abolition of the reserved area, which is, in essence, one way of financing the US. In Greece, the reserved area constitutes: 72% of the postal services provided by the USP in terms of volume; and 49% in terms of revenues, according to forecasted data for 2008. New ways of financing the US, in case the latter proves to be an unfair burden to the provider, include Government funding, or cost allocation among the postal services operators.

5.1.2. Postal Market Development Strategy

Responding to the requirements involved in the adjustment of the current legislation to the obligations set by the new Postal Directive, EETT conducted a Public Consultation in

mid-2008. During that Consultation, government agencies, market players, and consumers offered their opinions on issues regarding:

- The strategy for the development of the Greek postal market.
- The revision of the Regulation for General Authorization and Individual Licensing.

Specifically, the issues that were raised during the abovementioned Public Consultation are:

Context of the US

The participants in the Public Consultation pointed out that both the viability of the US and the degree of competition in the market depend on the nature of the US components. As a result, in choosing the range of services to be included in the US scope, the slow development of the Greek postal services market must be taken into consideration. It is worth mentioning that the number of postal items (letters and parcels) per capita today, is five times lower than the average of its European counterpart. The participants also mentioned the need for introducing new criteria in order to include certain services or products in the provision of US. Last, it was stressed that recording the needs of postal services customers is an essential requisite for the renewal of the US context.

Financing the US

The participants mentioned that a study needs to be conducted through which the methodology of calculating the net cost of providing the US will be determined. They also

mentioned the need to designate a mechanism for financing the US in case it proves to be loss making. Additionally, they considered that it is essential to glean the European experience on issues related to network cost accounting. Moreover, the need of calculating the cost of an efficient USP was considered to be of equally crucial importance, while the calculation of the benefits enjoyed by the USP was considered to be a difficult task.

Interconnection of Private Networks with the Public Postal Network

The interconnection of the operators' postal networks under the General Authorization regime constitutes an essential prerequisite in the provision of courier services. The access of the alternative operators to the Public Postal Network (PPN) is quite limited in Greece. To a related question posed during the Public Consultation, the participants responded that given the fact that the postal work production chain is complicated, it is extremely important to designate with precision the interconnection points between alternative operators and the PPN. The possible interconnection of the PPN with the networks of the alternative operators is expected to affect not only the sector investments but the wholesale and retail prices as well. Specifically, the participants raised the issue of price differentiation according to the distance of distribution/delivery points for postal items of operators interconnected with the PPN. Last, given that the density of PPN plays an important role in both retail customer service and wholesale collaborations, it was deemed important by the Public Consultation that a mandatory minimum of requirements regarding PPN density/dispersion should be set.

Proposed Measures for the Advancement of the Postal Market

The measures that should be taken towards the invigoration of the Greek postal market, was one of the issues raised at the Public Consultation. The participants admitted that the letter-post services have traditionally registered low volumes in Greece, with the situation having worsened since the advent of e-mailing. On the other hand, direct mail, logistics, and electronic commerce, even though still at a preliminary stage in Greece, are expected to register high mail volumes. The participants agreed that the further opening of the market will be an important and contributory factor towards market development.

Codification of Postal Services

Last, the codification of the Postal Services was another topic introduced by the Public Consultation participants who

admitted that it will help users in comparing services provided by different operators as long as it is made easy to understand.

5.1.3. Amendment of the Legal Framework

The issue of the new Regulation of General Authorization⁹⁶ results from the experience gained from implementing the current Regulatory Framework, the regular monitoring of the operators conducted by EETT's Postal Directorate, the findings of the study for the Greek and European Markets conducted by EETT in collaboration with an independent agency, and the upcoming liberalization of the European Postal Market. The promulgation of the Regulation on Individual Licence is expected within 2009.

The new Regulation aims at easing the requirements for the granting of General Authorization and offers the possibility to operators under General Authorization or Individual Licence status to also operate as branches of another licensed operator who is operating under General Authorization or Individual Licence status as well. More specifically, the operator handling the postal item and issuing the Express Delivery Voucher (EDV) will be the one obligated to pay the annual fee involved to EETT.

Moreover, the new Regulation of General Authorization sets the boundaries for the services that are to be provided under General Authorization and resolves licensing issues for operators handling direct mail. Specifically, the handling of direct mail where the address is indicated on the item itself; on a list; on an envelope; or on some other kind of packaging, requires an Individual Licence. If the direct mail is not addressed but is, nevertheless, contained in a special package, then its handling does require General Authorization. However, registering it in the operator's Special Postal Items Track and Trace System (SPITTS) is not required. With regard to the handling of not addressed and not specially packaged direct mail (flyers, brochures, etc.), there is no requirement for either type of licensing.

Additionally, the new Regulation of General Authorization introduces for all operators under General Authorization, a new text of terms and conditions on providing postal services. The Regulation, inter alia, defines the obligations of the operators (e.g. publication of the content, price, and quality of the provided services, SPITTS data, etc.). Additionally, it includes measures for safeguarding the rights of users (e.g., dispute resolving procedure, handling of non-delivered items, description of the Charter of Obligations to Consumers (COC), the requirement of retaining on file records of signed deliveries of the past six months, etc.). Moreover, it rewards those operators who employ ecologically sound technologies by offering them a reduction in their annual retributive fees.

96. EETT Decision 504/152/16-12-2008, GG Issue 46/B/19-01-2009.

Furthermore, with the 3rd Postal Directive in mind, EETT submitted a number of proposals to the MTC for the amendment of the current legal framework. Those proposals concerned the following:

- The re-evaluation of the upper limit of weight of parcels from 20 Kg to 35 Kg.
- The reinforcement of EETT' s responsibilities regarding the definition of: the density of the access points; the minimum required frequency of postal services; quality requirements; the exempted form the frequently serviced areas; the procedure of price approval; the issue of a Code of Practice; the available information regarding posted complaints and the procedure for resolving them; the monitoring procedure for the USP, etc.
- Issues related to the accounting system of providers operating under Individual Licence.
- The outline of the procedure for imposing fines or other types of administrative sanctions on cases where the requirements of General Authorization or Individual Licence have been breached.

5.1.4. Data and Evolution of the Postal Market

One of the basic responsibilities of EETT is the monitoring of the Postal Market. The collection of quantitative data and the registration of the market's quality characteristics relates to data regarding demand and supply, the degree of competition, investments, and the cost of the Postal Services. It is worth mentioning that, for the first time, the required data for the year 2007 was submitted to EETT by the operators in electronic form.

According to the results of the 2007 study conducted by EETT and as far as the entire Greek postal sector is concerned, the USP (ELTA) holds a major share of the market, namely 60% of the total market, in terms of revenues, while the remaining 40% is held by operators under General Authorization (39%) and under Individual Licence (1%).

Regarding the market shares in terms of volumes, the USP handled 93% of total postal items and the remaining 7% was handled by other operators.

Another result of the study is the fact that Greek consumers pay on average 0.60 euros for the delivery of a postal item when using the US provision, while this price is multiplied by ten when the consumer uses courier services. The deviation that exists between prices for US services and prices for courier services underscores the difference in the context of those services.

In 2007, the market showed significant mobility. It is estimated that during this year, about 770 million postal items were handled, generating about 717 million euros in revenues for postal sector businesses. Being more mature, the US market exhibits lower annual growth rates when compared to the courier services market. The average annual rate of increase for the volumes and revenues of the US market in the period 2005–2007 has been estimated at 4%, which is almost half the average annual rate of increase of the courier services market for the same period (11% in terms of volumes and 10% in terms of revenues). It is worth mentioning that, in comparison to previous years, the 2007 rates of increase for these two markets seem to have slowed down significantly.

The existence of the reserved area, which is also a way of compensating the USP for providing the US, results in the dominance of the USP in the letter-post market. In 2007, the USP handled 95% of the letter post market as opposed to the liberated market of parcels where the USP's existence is quite limited (only 14% of the parcels were handled by the USP).

Naturally, the gradual opening of the postal market created new jobs in this area. Today, 22,000 people are employed in postal services and about half of them (48%) are employed by private postal operators. Most of those jobs are full-time ones (11% of them are part-time jobs). The educational level of the employees is not very high (88% of them are high school graduates) due mostly to the nature of postal work. It should be mentioned that the number of employees working for private postal operators is among the highest in the member states of the European Union (EU).

5.1.5. The Greek Postal Market

As of December 31, 2007, in the postal market's liberalized part where more than 1,000 companies (including their networks) were in operation, the price differentiation relating to the place of delivery/destination of the handled parcels is remarkable. Particularly, the single item courier service within the country costs on average about 4.5 euros, but that amount climbs to over 35 euros if the place of destination is a foreign country. So, while the majority of the handled postal items (over 90%) are delivered to places within the country, the corresponding revenues are approximately 70% of the total revenues. Consequently, not only do international collaborations give the Greek postal market an economic boost but the know-how that the postal operators acquire through them results in the quality of the provided postal services being considerably upgraded.

More than 90% of the volumes and the corresponding revenues are handled independently, given that the postal operators, who handle significant volumes of postal items, tend to develop their own independent postal network

either through collaborations with licensed local operators or by incorporating into their network small, non-licensed companies. It should be mentioned that the development of independent, flexible, and efficient networks helps in reducing the handling time of postal items. Also, the fact that 85% of the items dispatched through courier services are delivered to the recipient within one day shows that there is sufficient infrastructure built by the courier operators over time.

The fact that the local postal operators have individual agreements of cooperation with larger operators (namely small postal operators become the local representatives of larger operators) results in the higher concentration level in the market. Hence, nine large operators handle more than 90% of the postal items thus gaining more than 90% of the resulting revenues. The existence of those companies in the relatively small market of Greece is mainly due to the fact that these small operators service different market sections by offering a full range of services that are fully adjusted to the conditions of their specialized sub-market. According to a study carried out by EETT, five out of the nine large operators specialize in deliveries within the country while the remaining four specialize in international deliveries (those four are mainly local branches of multinational operators). Additionally, the majority of the large operators (6 out of 9) handles postal items weighing no more than 2 kg (papers and small parcels constitute about 82% of the postal items handled), while the remaining ones handle the large parcels of up to 20 kg.

Naturally, the cities with a high density population generate the highest demand for courier services. For example, in Attica, due to the very high population density, the rate is 7 postal items per capita, while Athens and Thessalonica are the origination places of 80% of the postal items delivered within the country. Consequently, more than 60% of the registered operators choose to locate their business in those cities. The customers of those operators are either commercial enterprises (information technology companies, telecommunications, retail commerce, publishing companies, etc.) or businesses specializing in the service area (banks, insurance companies, advertising companies, tourist offices, etc.) and also based in these two cities. All of those customers mentioned above produce more than 70% of the generated volume. On the other hand, personnel and operating expenses are the major source of cost for these companies. Yet, despite the increase in the operating cost and the threat resulting from the substitution effects, the viability of the companies seems to be secure by means of the development of related sectors such as advertising/direct mail and electronic commerce.

5.2. Universal Service

5.2.1. Quality Measurements of Domestic Mail

The US in our country entails a wide range of postal services whose provision is based on a national postal network around the country. The items of the US are offered at prices that vary according to the type of the item (letter or parcel), the origination place (domestic or international), the delivery speed, the weight, the size, the type of sender (private or business), the handling type (e.g., guaranteed delivery), the added value service (e.g., declared value delivery) and a series of other factors that are explicitly displayed on the price list of the USP. It is worth noting that the USP reserves the right to be the only operator handling postal items weighing up to 50 gr. on condition that their price is lower than 1.43 euros (reserved area).

One of the quality indices of the US is the time required for a postal item originating from the nearest access point of the sender's USP (e.g., public letter box, postal office, etc.) to be delivered to the nearest access point of the recipient's USP (e.g., public letter box in the recipient's area or rural post office box situated at a small distance from the recipient's base).

For the A' Priority Domestic Mail, quality measurements are conducted according to the EN13850 standard. These measurements exclude the inhabitants of certain areas whose access by land, sea or air, is extremely difficult with the result that collection and delivery in those areas occurs only during those working days when there is scheduled transportation by land, sea or air (Ministerial Decision - MD 28977/811/21-06-2006). Consequently, the residents of the country that do not enjoy all of the five days of postal service (about 7%) are excluded from the quality measurements.

Moreover, it is estimated that for a significant percentage of the population (approx. 13%), delivery does not take place "at home", but rather at a predefined place (rural post office box) located at a certain distance from their home base (approx. 6%), or at another appropriate infrastructure (approx. 7%). In these cases, the ability to measure the US quality is quite difficult, since the longer the distance between the deposit and delivery points, the less reliable the resulting measurements. Consequently, the measurements which are taken usually concern those residents of the country that receive postal service five days a week and have their mail delivered "at home" (approx. 80% of the population).

It should be mentioned that EETT has already launched the procedure of collecting and evaluating the data regarding

both the areas of the country excluded from five days of postal service and those where the “at home” delivery does not happen.

In 2008, EETT hired an international consulting firm in order to evaluate the measurements of the USP. The quality goals are set by the MD 28977/811/2006. The results of the measurements are presented in Table 4.

Table 4
Results of the A' Priority Domestic Mail Quality Measurement

YEAR	SEMESTER	USP's Obligation according to MD 28977/811/2006		USP Results based on Measurement					
		D+1	D+3	D+1		D+3		Average Duration of Delivery (Days)	
2006	1 st Semester	85%	98%	75.3%	77.7%	97.3%	97.3%	1.20	1.15
	80.0%			97.4%		1.11			
2007	1 st Semester	86%	98%	78.7%	78.8%	97.8%	97.8%	1.16	1.18
	78.8%			97.8%		1.19			
2008	1 st Semester	87%	98%	79.2%		98.3%		1.14	

As it is shown in the above Table, the speed indicator (i.e., the percentage of valid test letters handled from the deposit point to the delivery point within one business day as of the deposit day) for A' Priority Domestic Mail during the first semester of 2008 lags significantly behind the target quality level, while the reliability indicator for this type of service (i.e. the percentage of valid test letters handled from the deposit point to the delivery point within three business days as of the deposit day) is sufficiently close to the target

level. Please note that, after 2007, the speed and reliability indicators have mainly remained stable on the whole, at approximately 79% and 98%, respectively.

Taking into account the fact that a significant percentage of the population is excluded from the quality measurements (an estimated 20%), the delivery time for A' Priority Domestic Mail for the first semester of 2008 for the entire population, is summarized in Table 5.

Table 5
Speed of Domestic Postal Service in the First Semester of 2008

CATEGORY	SPEED OF DELIVERY (TRANSIT TIME)	%
Daily service to the recipient's base	Within 1 day	63.4
Daily service to the recipient's base	More than 1 day	16.6
Non-Daily service to the recipient's base	No measurements conducted	7.0
Daily service close to the recipient's base (rural post office box)	No measurements conducted	6.0
Daily service close to the recipient's base (other appropriate infrastructure)	No measurements conducted	7.0
TOTAL		100.0

5.2.2. Quality Measurements of International Mail

The International Postal Corporation (IPC) performs respective measurements for the quality of A' Priority International Mail on an annual basis. In 2007, the speed and quality indicators

for outgoing mail from Greece to twenty-eight European countries (International Outgoing Mail) are higher than the corresponding target level for the majority of countries (>70%) that are included in the measurements. The speed and quality indicators are defined as the percentage of valid

test letters that are delivered within three and five business days as of the deposit day, respectively.

Given that delivery is the most time- and cost-consuming phase of postal work, the effectiveness of the Greek USP compared to the USPs of other European countries, is judged by the speed and the reliability with which the mail comes from other European countries into Greece (International Incoming Mail). It should be mentioned that the level of the termination rates that country A pays to country B for the delivery of the mail going from country A to country B (termination rates) is affected by the International Incoming Mail and Domestic Mail quality measurements. The quality measurements conducted by the IPC in 2007 regard, inter alia, the speed and reliability indicators for A' Priority International Mail originating from twenty-seven European countries and

terminating in Greece. The reliability indicator ranks higher than the target level, in the majority of the cases (74%). However, the speed indicator for International Incoming Mail in our country is considered to be sufficient in only half of the countries (14 out of 27) that participated in this evaluation. Given that the United Kingdom (UK), Germany, France and the Netherlands are the largest postal markets of Europe, in terms of both generated volumes and revenues, the presentation of the speed indicator for mail originating from those countries and delivered to Greece carries significant importance (Figures 4 to 7).

It is obvious that the delivery speed of the mail coming into our country from the above mentioned four countries is quite high (well above the targeted level). Additionally, the delivery speed indicator has been improved since 2005 significantly.

Figure 4
Speed of International Incoming Mail, the United Kingdom

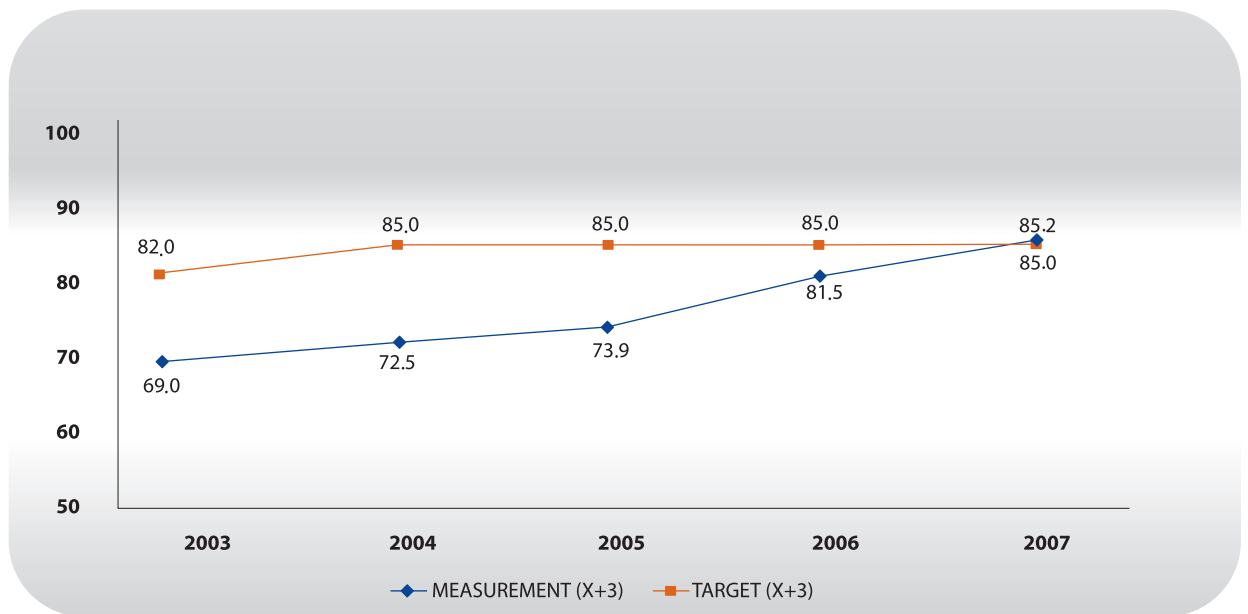


Figure 5
Speed of International Incoming Mail, Germany

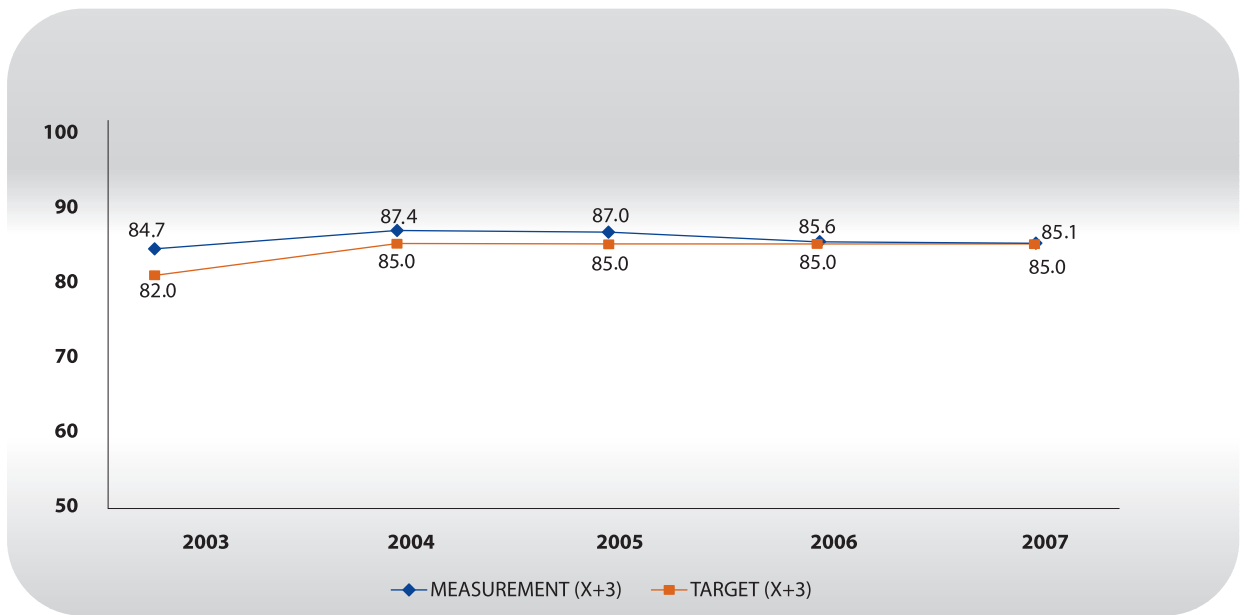


Figure 6
Speed of International Incoming Mail, France

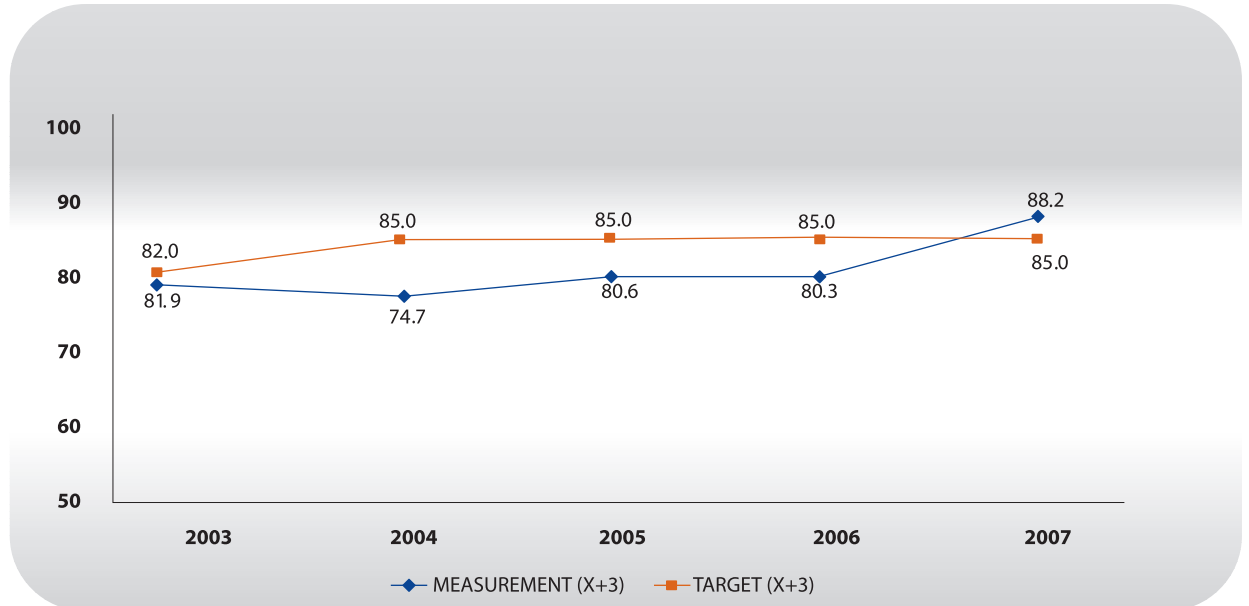
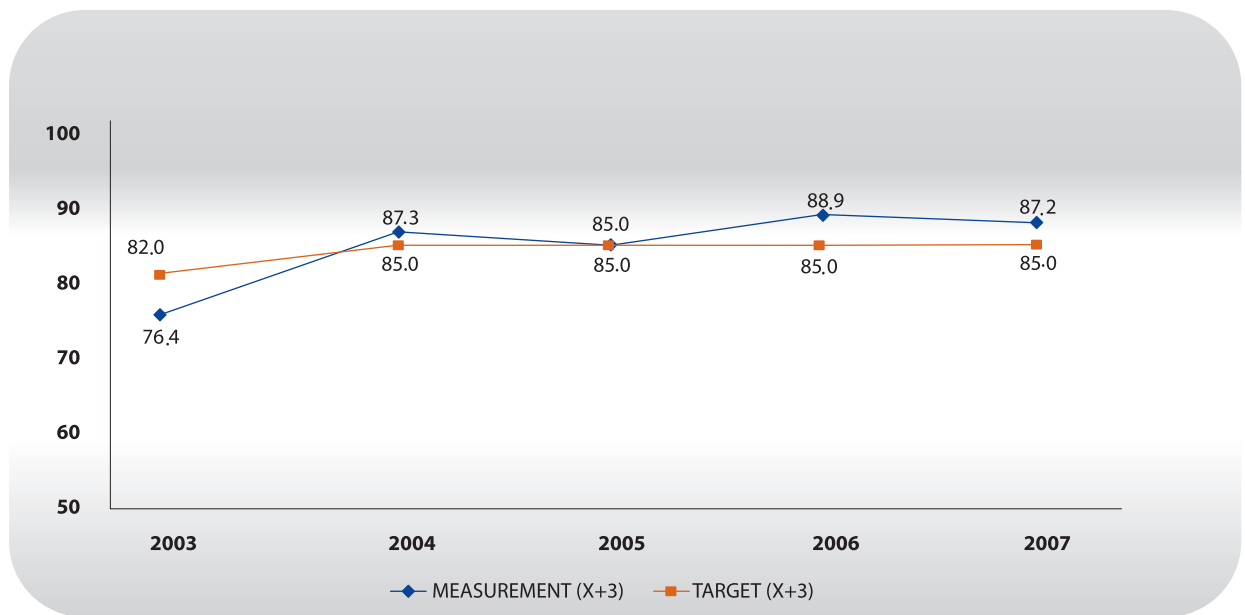


Figure 7
Speed of International Incoming Mail, The Netherlands



5.2.3. The USP Cost Model

In 2008, in collaboration with EETT, the USP continued to work vigorously towards the development of a contemporary model for the cost evaluation of its provided postal and non-postal services, by using the Activity Based Costing (ABC) methodology. According to the ABC methodology, initially, the cost sources (personnel salaries, operating expenses, sales cost, asset depreciations, etc.) are determined. Then the costs are allocated to the activities (main, secondary, and supportive) and, last, they are allocated to the products (over 4,000 products). It should be mentioned that the activities cover all the phases of postal work (collection, sorting, transportation, and delivery) while the drivers employed for the cost allocation of each phase are determined by the cost causality principle.

5.3. Developments in the International Postal Market

The main developments in the European Postal Market during 2006–2008 are summarized in the relevant Report by the European Commission, which was published in September 2008 and covered issues such as the implementation status of the new Postal Directive in the Member States, the development of the European Postal Market, the presentation

of the needs that users of postal services have, and the positive impact the use of new technologies has in postal work.

5.3.1. Consumer Survey Results

In an Internet-based survey conducted for the purposes of the Annual Implementation Report, it was ascertained that European consumers, with significant annual volumes of mail (mostly businesses, banks, organizations, etc.) believe that the main consequence of the market opening will be the reduction in prices. At the other end, consumers who make modest use of postal services also believe that the competition will provide them with more choices and will pressure providers (especially the USP) to further adjust their services to user needs, all the while encouraging the modernization of the existing services and the development of new ones.

The European Commission's survey demonstrated that 35% of the users are not satisfied with the services provided by the USP. The response of the USP to consumer complaints is seen in a negative light by the majority of the survey participants (75%). The majority of complaints that are filed with the USP are either not handled or the procedures to follow are complicated and time-consuming for complainants. In any case, the participants agree that there is a balance between quality and price of postal services, but the average European

consumer is troubled over the fact that the postal operators do not keep their promises when providing services.

Last, the businesses that took part in the survey over the Internet, pointed out the need for standardizing international mail services (i.e., the way in which the address is written, distinction between documents and parcels, etc.).

5.3.2. Access to the Public Postal Network and Pricing of Services

The European Regulators deemed access to the PPN crucial for the future of the market. They distinguish mainly two types of access to the PPN: access to the infrastructure of the postal services' users and access to the network of the USP. The first type of access to the PPN refers to the use of the infrastructure of citizens and businesses (i.e., letter boxes, post-letter boxes, etc.) by the alternative operators, the availability of the data base for addresses and postal codes (automatically updated when changes occur) to alternative operators, and the ability of cooperation when re-routing the postal items that were either delivered in the false address or the recipient was unknown. The second type of access concerns the use of the USP's infrastructure (Sorting Centers, Sorting Units, public mailboxes) by licensed postal operators. In the countries where some form of access to the PPN is active, the terms and conditions are determined either by the National Regulatory Authority (NRA) in a clear and fair manner, or by individual agreements between the interested parties. The price that is paid by the alternative operator to the USP for accessing the PPN is determined by the retail price of the USP services reduced by the amount that the USP does not pay due to the provision of wholesale services by the alternative operator (retail minus). An exception to this rule is the pricing of the access to the PPN that is applied in the UK, which is based on the termination cost of the access point (namely, it does not take into consideration the fixed collecting cost from the access point), along with its use by the alternative operator (group or individual deliveries).

The USPs of the member states are required to provide the US at affordable prices to the European consumers. Nonetheless, some member states, mostly due to the high volatility that has been observed in the annual US price level in European countries, have adopted stricter measures in order to restrain the increase rate of the US retail prices. In many countries, the highest annual increase allowed in the US retail prices is attached to the Consumer Price Index (CPI). On the other hand, in countries where the reserved area is in effect, there is an effort to keep the prices close to the cost of the services. Unfortunately, the low quality and detail level of the data regarding the cost of the services that are submitted to the NRA, as well as the latter's lack of technical knowledge in

analyzing the submitted data, makes the job of monitoring the cost-orientation for the US retail prices even harder. For example, in the cost-orientation procedure, the allocation of the US cost to the products employs as allocation factors the volumes of the examined services. In many cases, the USP is unable to submit reliable volume data for certain types of products that belong to the US. The measures used by the Member States to monitor the increase in the US prices (either through the CPI or through the services' cost-orientation) and would normally lead the USPs to reduce the US provision cost and increase their profit margins, do not appear to be successful. Perhaps, the competition effect on the US prices is another factor that should be taken into consideration.

5.3.3. The Development of the European Postal Services Sector

The development of the postal market is closely linked with the general economic development of the member states. Indeed, in the twelve new entrant states of the EU where the economic indicators are still quite high, the postal items' volume registered an annual increase rate of 6.5% during 2004-2006. It should be mentioned that, in those countries, direct mail (namely the addressed mail from businesses to individuals) contributes significantly to the development of the postal sector. On the contrary, in the remaining fifteen countries of the EU, where the average annual GDP increase is limited, the average annual increase of the postal items is also limited and did not exceed 1.5% during 2004-2006. In these countries, the increase rate of addressed mail is practically negligible. In any case, in all European countries, the electronic substitution has had a negative effect on the handled postal items of all categories, apart from that of parcels. The handled volume of parcels is expected to give a significant boost to the revenues of the sector.

The competition in the addressed mail market within the US sphere is quite limited in most European countries. However, in some countries (Spain, Sweden, Germany, and the Netherlands), the alternative operators handle door-to-door a significant percentage (9-14%) of this type of mail. In the UK, where collaboration agreements have already been signed between the USP and the alternative operators for the use of the PPN, about 20% of the volume inside the US sphere is handled via these agreements, but only one operator has developed the necessary infrastructure for the provision of door-to-door service (exchange of documents).

However, the provision of parcels is quite more competitive than the mail market. The operators that specialize in parcels' services also offer either highly-priced express delivery services or services tailored to their customers' needs (regular delivery, of lower cost but at a pre-determined time and

place). The operators providing parcel services are operating either in national markets, business to customer, or in international markets.

Some of the most significant barriers in the further development of competition in the European postal market are the following:

- Special rights enjoyed by the USP (e.g., VAT exemption).
- Non-accessible PPN.
- US characteristics (content, cost, financing).

The personnel employed in the postal sector of twenty-seven member states in the EU reached approximately 1.6 million employees in 2006, including the 200,000 individuals employed by the courier sector. During 1997–2006, a decrease of approximately 7.7% was observed in the number of people employed by the USPs of member states. The decrease was due to the effort to re-organize the USPs, in view of the market opening and to implement new technologies. It should be mentioned that during 2005–2006, the number of jobs (approx. 20,000) that were lost by the USPs of the member states, were replaced by new jobs offered by the alternative operators. The USPs have established subsidiary companies that operate either in the courier sector or in the logistics sector. Nevertheless, the majority of their employees are still employed in the traditional mail services, the only exception being the “Deutsche Post”, where there seems to be an equal proportion of employees allocated in three types of services. It is worth mentioning that the “Deutsche Post” holds a leading position in the global courier and logistics market.

5.3.4. New Technologies and their Importance in Market Development

The new technologies result in faster, more reliable, and better quality postal services. Furthermore, cost reduction, the increase in productivity of the personnel employed and the increase in revenues via the offer of value-added services, are some of the positive effects of implementing new technologies in the postal sector.

Up until the end of the last century, the labor cost was a significant percentage (>80%) of the total USP’s cost in member states. Nowadays, the automation of the production chain, especially at the sorting phase, results in a significant reduction in the contribution of labor cost to total cost (55–75%). The question that arises is whether the introduction of new technologies will result in the substantial reduction in the cost of the postal work. The USPs of member states are developing automated sorting activities that are expected to result in a 10% reduction in the total cost. However, automation in the sorting activity that could reduce the cost of postal work up to 50% is not yet feasible. Additionally, in the EU countries, the automation level of the sorting activity

differs. For example, in some countries, the distributed volumes of the USP’s largest clients are automatically sorted out in the Sorting Center according to the delivery destination while, in some other countries, this procedure is implemented for all businesses (irrespective of size), and in still others the total of mail (both business and individual) is automatically sorted before entering the next phase of the production chain.

Hybrid mail is produced and forwarded electronically from the sender to the operator of his choice and, in turn, the operator forwards the message electronically to the point that is closest to the recipient, where it is printed, enveloped, and delivered to its destination in a physical manner. According to data from the Universal Postal Union (UPU), in 2004, more than two billion items were handled worldwide through hybrid mail. For the consumer, the collaboration of modern technology with the traditional post reduces significantly the cost and improves the delivery speed of an item, since collection, transport, and sorting are executed electronically.

A characteristic example of a value-added service that uses new technologies is the electronic stamp: the postal item data (such as the type of service that the sender is using, the address of the recipient, the cost, the day of sending, etc.) is stored in an encrypted way. Production and distribution of those stamps is done via the Internet and the sender is able to print and place the electronic stamp on the postal item. The electronic stamp is the identity of the postal item which, for security reasons, cannot be duplicated. Another application of the technology in daily postal work is the use by postal operators of the Radio-frequency Identification (RFID) who monitor in this manner the postal items through their streamlining in the postal network. In this way, the different production phases are optimized and the handling time from sender to recipient is minimized.

5.4. EETT Monitoring and Supervising Activities

The audits conducted by EETT’s Postal Directorate can be categorized as follows:

- Scheduled audits of registered postal operators that ascertain the compliance of the operators with the terms and conditions of their license (e.g., use of the SPITTS, payment of fees, compliance with the COC, observance of the USP’s reserved area rights, etc.).
- Unscheduled audits as a result of complaints filed by users or by other postal operators are usually performed on non-registered operators who are offering postal services. The purpose of these audits is to find out whether the audited operators provide postal services without the

required General Authorization / Individual Licence.

- Remote SPITTS audits of registered postal operators during which operators are asked to give the auditors an indicative sample of the System.
- Remote scheduled audits of mainly non-registered operators after complaints filed by users and/or other operators regarding non-compliance with the current legislation.
- Direct audits conducted via Hearings to which mostly non-registered operators are summoned in the aftermath of complaints filed by users or by postal operators.

During 2008, seven scheduled audits were conducted throughout the Greek Territory. As in previous years, the insufficient registration of track and trace data in the SPITTS (due to the incomplete filing of the EDV) and the incorrect payment of fees are some of the most frequently observed delinquencies of postal operators.

During 2008, emphasis was placed on the remote SPITTS audits. In total, 175 audits were conducted. In 37 of the cases and in addition to other checks made, the person running the operation was asked to produce some proof of his/her professional competence. According to the General Licences Regulation, each operation under General Licence is required to keep electronically on file for a period of up to six months after the delivery of the postal items it is handling the following: the address of the sender/recipient; the item's identification code, date, place, and time of delivery/deposit; weight; item description (document, parcel); type of the provided postal service according to the COC; and data regarding the number of times the effort to deliver had been repeated in the case of a failed first delivery.

During remote audits, an indicative sample of the SPITTS (in physical or electronic form) for the postal items handled by the operator during a certain period of time is requested of the audited operators. Out of the 175 audits conducted by EETT, 93 operators (53%) submitted indicative SPITTS samples to EETT. After a thorough examination, it was ascertained that 49 operators had omissions in the requested handling data that were registered in the SPITTS. The observed omissions are presented, in declining order, in Table 6.

It is mentioned that a letter requiring compliance was sent to the operators showing SPITTS omissions. In the cases where a high degree of delinquency was observed a re-examination was scheduled. For those operators who did not submit a SPITTS sample, EETT decided to summon 101 of them to a Hearing, after also having taken into account whether they had complied with the request to submit supporting data and whether they had paid their fees during 2007 and filed the required questionnaires for the same year.

In the aftermath of the performed scheduled and SPITTS

audits during 2008, all the operators (341) registered by 31-12-2006 had been audited by EETT. Specifically, the scheduled audits (a total of 70) conducted by 31-12-2008, in the presence of a Certified Accountant, cover 98% of the market in terms of volume and revenue.

Last, it should be mentioned that EETT conducted audits (autopsies) in the areas of Dioni Pikermi and Drafi Penteli in order to ascertain whether the requirements for the exception of those areas from the required frequency of the US and the delivering of postal service via rural post office boxes were met. The result of the audits was that the USP was summoned to a Hearing by EETT. During the Hearing the USP submitted data relating to the use of rural post office boxes around the country.

5.5. Goals

The goals set by EETT's Postal Directorate of EETT for 2009 are the following:

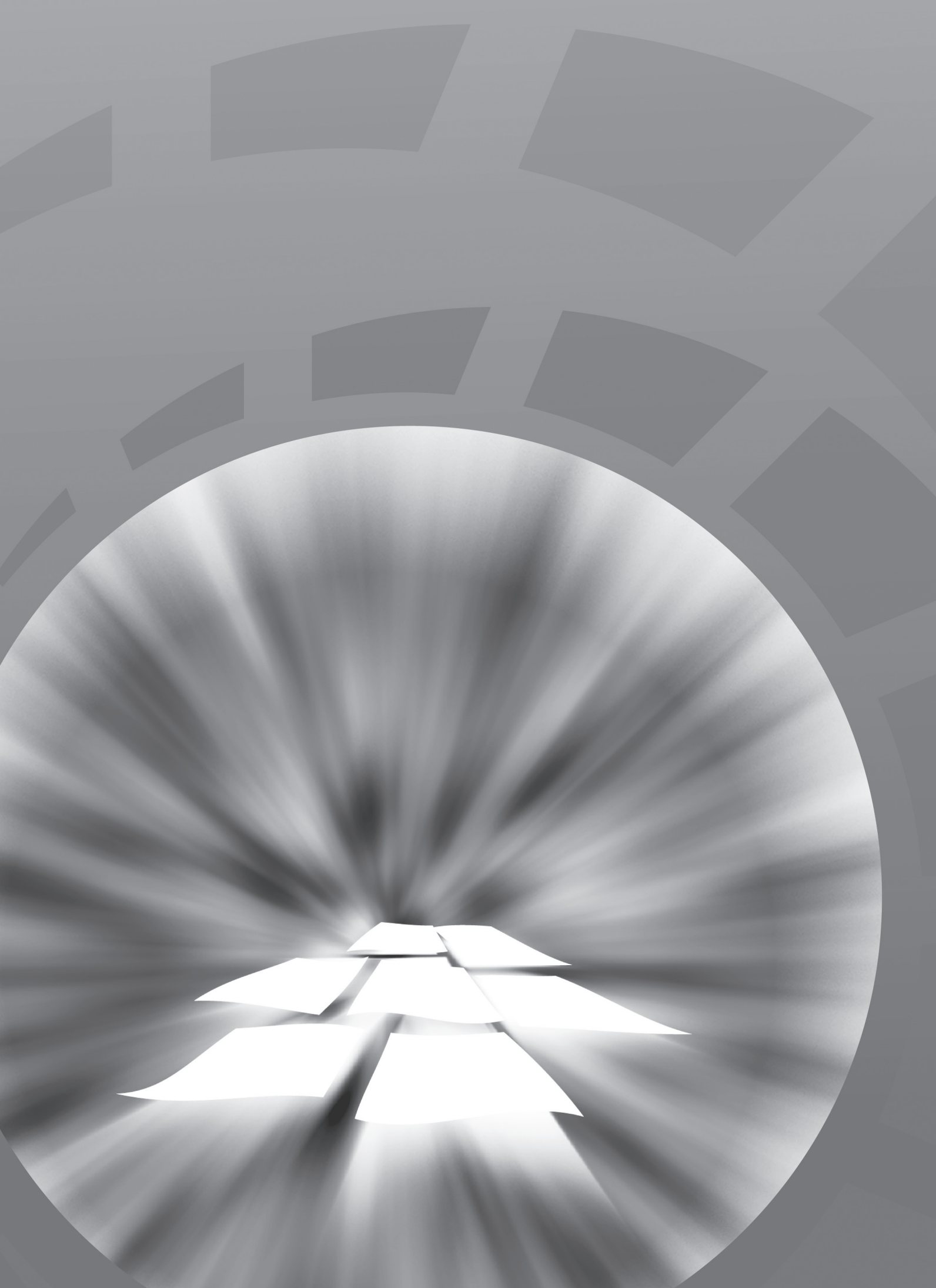
- Issue of the Regulation for Individual Licences.
- Organizing information actions with market players, the state, and other interested parties for the quicker compliance of the sector with the requirements of the revised Regulation for General Authorization.
- Preparation and submission of a complete new Law Draft to the MTC for the amendment of Law 2668/1998 according to Directive 6/2008.
- Evaluation, submission of improving proposals, and approval of the USP's cost-accounting system.
- Monitoring of the quality of the US provision, examination of the requests for exception from the quality measurements with simultaneous evaluation of the areas that are exempted from the regular frequency, as well as the areas where "at home" delivery does not take place.
- Submission of proposals to the MTC regarding the issue of a revised Joint MD on "Redefining the Quality Requirements and the Terms for the US Provision".
- Collaboration with authorities for locating businesses which provide postal services without the appropriate licensing.
- Collecting and evaluating data and conducting studies regarding the domestic market, the development of a strategy for the better use of PPN in the interests of competition, and the effects of the development of the transportation / logistics services on the Courier market.
- Adjustment of EETT's Postal Registry to the requirements of the revised Regulation for General Authorization (accurate description of private postal networks, etc.).

Table 6
Results of the Remote SPITTS Audits for 2008

NON-RECORDED DATA IN THE SPITTS	PERCENTAGE %
Item according to the COC	71
Distinction between Document / Parcel	62
Delivery Time	55
Weight or Weight Category	48
Deposit Time	40
Sender's Data	39
Place of Delivery	37
Date of Deposit	32
Place of Deposit	31
Recipient's Data	30
Date of Delivery	12
Item Identification Code	11

Table 7
Results of EETT Hearings

Recommendations – Warnings	8
Fines	6
Further Investigation	3
Fee Recalculation	2
Acquittals	1
Pending Decisions	18
TOTAL	38





6. National, European, and International Collaborations



The gravity and the scope of EETT's role render the continuous cooperation with other organizations, be they governmental or non-governmental, necessary. At the same time, the dynamic and rapidly changing environment in which EETT operates calls for close cooperation at the European as well as international level.

Under these circumstances, EETT has identified the national, European, and international relations as an integral part of its current task. In the context of its jurisdiction, it collaborates with other National Regulatory Authorities, public authorities and citizens organizations, while it coordinates at the same time its actions with the National Regulatory Authorities (NRAs), the European Commission, and other community and international organizations.

Through this dynamic perspective of its actions, not only does EETT acquire valuable knowledge but it also advances its work, promotes Greece's positions, and contributes to the shaping of European and international developments.

6.1. Cooperations at the National Level

6.1.1. The Hellenic Competition Committee

2008 was another year of close and effective cooperation between EETT and the Hellenic Competition Committee. The cooperation of the two National Authorities concentrated mainly on their dealing with complicated issues that related simultaneously with the Electronic Communications' market and the market for the provision of radio and TV services so that they two Authorities may further clarify issues of jurisdiction and issue the necessary guidelines.

The coordinated action is concurred by the constant "communication" of documents between the two Authorities, the simultaneous notifications of companies' mergers/acquisitions, as well as a number of contracts and other requests.

The cooperation also extended at the European level, in the European Competition Network (ECN) of which the two Authorities are active members, putting emphasis on the exchange of practices and experiences for the coordinated implementation of the rules of the European Competition Law.

6.1.2. The Greek National Council for Radio and Television

In order to exercise its jurisdictions regarding the supervision of radio and TV spectrum and the granting of radiofrequency

rights of use, in 2008, EETT was in close collaboration with the Greek National Council for Radio and Television (NCRTV) which is the NRA authorized to examine the legal operation of radio and TV stations.

Specifically, in 2008, EETT was informed by the NCRTV of:

- The authorized and legally operating radio - TV stations.
- The channels of radio - TV stations registered in every region.

Also, EETT notified the NCRTV, in order to take further action on:

- The data of registering the radio - TV stations carried out within this year throughout the Greek Territory.
- The results of the investigation into the use of radio and TV spectrum.
- The relevant decisions issued by EETT.

6.1.3. Consumer Organisations and Consumer Protection Organisations

In the framework of resolving requests and complaints of telecommunications services' consumers, EETT, via its Consumer Service Sector for Telecommunication Services (CSSTS), prepared and completed in 2008 a series of meetings with Greek Consumer organizations (e.g., the General Association for Greek Consumers-INKA, the Consumers' Association - The Quality of Life (EKPOIZO), the Center for the Protection of Consumers - KEKPA, Union of Citizens-Eurozone) as well as with public organizations such as the General Secretary for the Consumer and the Consumer Ombudsman.

The aim of those meetings was for the organizations to become informed of a series of issues such as:

- The way complaints are handled by EETT and the official procedure to follow when filing a complaint.
- The jurisdiction of EETT over consumer issues.
- The leaflets and the regulatory documents that EETT has issued (for example the “Guide for the Informed Consumer” and the “Code of Practice for Electronic Communications”).
- The publication of comparative tables with the quality indicators of Electronic Communications services on the EETT website.

Moreover, EETT participated in a conference organized by the Hellenic Institute of Customer Service (HICS) in Athens regarding the benefits the market has from having Greek consumers effectively and constantly informed and served.

6.2. The European Union

6.2.1. European Regulators Group

EETT participated actively in the proceedings of the European Regulators Group (ERG). The basic themes of the ERG’s working programme were the following:

- Review of the European Regulatory Framework for Electronic Communications which began in 2005 and in which the ERG has played an active, consulting role.
- Regulatory issues with regard to the Next Generation Access Networks.
- Current developments in technologies and markets.
- Harmonisation of the regulatory measures implemented in the member states.
- Support of the European Commission regarding the review of the Regulation on International Roaming.

Within the framework of the ERG, EETT participated in working groups for further analysis of the following issues:

- Significant Market Power (SMP).
- Interconnection in IP level and Next Generation Access Networks.
- International Roaming.
- Convergence issues.
- Regulatory cost accounting.
- Cooperation between the ERG and the Radio Spectrum

Policy Group (RSPG).

On October 24, 2008, EETT hosted in Athens a meeting of the working group for the Significant Market Power (SMP Project Team).

Last, the participation of EETT in the ERG’s working groups on consumer issues, as well as in conferences hosted by the “Consumer Panel” of the British NRA “Ofcom” in Great Britain and in Brussels has been remarkable.

6.2.2. European Competition Network

EETT, due to its jurisdiction over the markets of Electronic Communications and Postal Services and in the aftermath of a relevant invitation by the European Commission, participates as an active member in the ECN and particularly in the ECN “Telecoms Sectoral Subgroup” that handles and examines pending issues and practices in the Electronic Communications sector across Europe regarding infringements of articles 81 and 82 of the EC Convention. Specifically, the members of ECN discuss both pending and completed cases of “restrained practices” of telecommunication operators, pricing policy practices, abuse of dominant position of the former monopoly operators, in addition to other complicated competition issues of the specific market. The main issues on the agenda of the ECN members’ meetings were, inter alia:

- The Leniency programme for enterprises involved in anti-trust behaviors.
- The review of article 82 of the EC Convention (especially the “Discussion Paper” of the European Commission).
- The compensations of enterprises and individuals stemming from violations of Articles 81 and 82 of the EC Convention.
- The general policy on the exchange of practices among National Authorities for a number of issues concerning competition policy.

6.2.3. Comité Européen de Réglementation Postale

In October 2008 EETT hosted for the first time in Athens the Plenary of the European Regulators of the Postal Market (CERP) with the participation of representatives from 32 member states, representatives of international organizations (UPU, EU) and officials of the Greek State (Ministry of Transport and Communications – MTC).

Specifically, for the member states of the EU, the acceleration of the procedures for the implementation of the 3rd Postal Directive proved to be a vital issue. As a consequence, it was agreed that issues such as the definition of the Universal Service Provider (USP), the access to the Public Postal Networks

(PPN), the cost accounting and pricing issues of the Universal Service (US), the procedures for resolving complaints filed by users of postal services and the supervision of the market should be addressed in the spirit of the new Directive. Within this framework, the representatives of the NRA pointed out in their presentations the following:

- Structure and the most important developments in the domestic Market (Greece).
- Implication of the domestic market's gradual liberalization to the US Provider (Poland).
- Procedures of compensation for the US provision (Lithuania).
- Definition of the US cost (France and Denmark).

Last, in the framework of the Conference, a roundtable discussion was organized regarding the liberalization of International Mail in Europe.

6.2.4. Postal Directive Committee

After the CERP Conference in Athens, a meeting of the Postal Directive Committee (PDC) was held in Brussels during which the timetable for implementing the 3rd Postal Directive was set.

The meeting concentrated on the following:

- The need for a bilateral meeting of every member state with the EU for the resolution of practical issues that emerge in the domestic markets during the implementation of the new Directive.
- The registering of the member states' shared experiences and concerns emerging during the implementation of the new Directive.
- The periodic review of the progress made in achieving the Directive's goals for all member states through the analysis of the domestic markets' data.

6.2.5. 24th Conference of the Universal Postal Union

EETT participated in the workings of the 24th Conference of the Universal Postal Union (UPU) where decisions are taken about changes in the Universal Postal Convention, that govern the relations of postal services globally and which takes place every four years.

The main issues that were discussed concerned the more efficient interconnection of postal networks globally, the more fair definition of the terminating fees and the more efficient use of new technologies in the postal work.

Another basic issue of the Conference was the replacement of the term Postal Administration with the terms Member Country and/or Designated Operator, aiming at delegating a number of responsibilities from public providers to member states, fully or in part, thus reflecting the gradual change that has been taking place in the operational status of the public postal providers.

At the closing of the Conference, Greece achieved a very important distinction by assuming the Presidency of the Postal Operations Council (POC) of UPU.

6.2.6. Annual Study of the European Competitive Telecommunications Association for the European Telecommunication Markets

The annual study of the European Competitive Telecommunications Association (ECTA) titled "ECTA Regulatory Scorecard", analyses the environment of the Electronic Communications Market in 20 European countries including the 18 member states of the EU, Norway and (as of 2008) Turkey.

In 2008, Greece ranked 16th (among 20 countries), in 2007 it also ranked 16th (among 19 countries) and in 2005 Greece was last on the list. Despite the low ranking, the significant progress that has been made during the last three years is evident, a fact that is also characteristically mentioned in the study: "Even though its ranking has not been improved, Greece presents significant progress in relation to the 2007 Scorecard, especially in the matter of the Local Loop Unbundling implementation".

The general progress that the country has shown in the last three years should also be considered outstanding, since from the last place on the Scorecard in 2005 it rose in 2008 to be included in the third out of four dynamic groups, along with countries such as Sweden, Spain and Belgium. This progress is fully displayed in Table 8, where the ranking of the countries from the ECTA Scorecard studies is presented for the years 2005-2008.

- In 2005 Greece gathered 218 points and was 222 points behind the United Kingdom which came first.
- In 2008 Greece gathered 247 points and was 126 points behind the United Kingdom which came first.

A further assessment of the ECTA classification shows that from the 19 individual categories that are analyzed in this study, Greece presents: high performance in 6 categories; medium performance in 9 categories; and low performance in 6 categories.

The respective figures for the categories in 2007 were (in a total of 19 categories): 6 with high performance, 4 with

medium performance; and 9 with low performance. It is thus evident that there are visible signs of improvement. Special reference should be made to the following:

- In the regulatory framework, Greece appears to have the highest ranking along with Denmark and Italy. It is a very significant achievement, especially if we take into consideration that our country just 3 years ago was indicted before the European Court of Justice for the long delay in implementing the European Regulatory Framework.
- In the situation of the broadband market, Greece is in the medium dynamic group. That is an exceptional progress if one takes into account that, two years ago, our country was last in broadband penetration and still remains the only country in the EU where alternative telecommunication networks (such as cable TV, fixed wireless access networks, fiber networks) constitute less than 1% of broadband lines.

Moreover, it is clear from the study that there is room for improvement in many fields. Indicatively, the following are mentioned:

- The delay in signing the Joint Ministerial Decision (JMD) for the Rights of Way, for which EETT had submitted the relevant proposal since June 2007, is fully reflected in the respective part of the questionnaire in which Greece's grade is 0 (highest grade: 20).
- The delay in the transition to digital TV, the lack of a defined schedule for utilizing the digital dividend for the provision of telecommunication services and the lack of certain planning for the usage of spectrum in the provision of TV services through networks of mobile TV – issues that are beyond EETT's jurisdiction – are illustrated by the low ranking of the country in the frequencies section.
- In the section of technological neutrality in regulation, our country received the grade of 0 (highest: 30). This grade had been anticipated, as most of the criteria concern regulatory actions regarding the next generation access networks and it was premature for Greece to be included in the previous round of the markets' analysis and regulation (2006–2007). Many of those issues are expected to be dealt with in the current round of analysis and regulation (2008–2009), taking into account the needs of the Greek market.

6.2.7. Other Official Committees

In 2008, EETT participated in the proceedings of the EU's Committees and Groups, contributing in this way to the shaping of European developments. Specifically, EETT

participated in the following Committees / Groups:

- The Communications Committee (COCOM): EETT takes part as an observer in lieu of the MTC which is the official representative of our country in this committee.
- The Working Group Frequency Management (WGFM): it is a working group of the Electronic Communications Committee (ECC) that is responsible for the management of frequencies. The WGFM with the participation of the CEPT member states, issues special regulatory provisions⁹⁷ for all matters regarding frequency management, such as issues of mobile service, broadband wireless access, IMT systems, and short-range devices. At the same time, EETT participated in the workings of the sub-group for spectrum monitoring, the object of which was the implementation of procedures for measurement techniques, the signing of agreements for cross-border activities and the exchange of information at technical and administrative level. Moreover, it participated in the sub-group WGFM PT44 for issues relating to the spectrum management of satellite service.
- The Radio Spectrum Committee (RSC): it was created by a decision of the European Commission aiming at guaranteeing coordinated conditions for the availability and effective use of radio spectrum, which are necessary for the establishment and operation of the internal market in areas of community policy, such as Electronic Communications, transport, research, and development.
- The Telecommunications Conformity Assessment and Market Surveillance Committee (TCAM): it was established in order to support the European Commission, advise on issues such as the Directive 1999/5/EC for Radio and Telecommunications Terminal Equipment (RTTE) and, when necessary, to issue guidelines on individual matters.
- The Administrative Cooperation Group (ADCO): Its basic task is to support actions regarding the joint management of the problems concerning the monitoring of the RTTE market.

6.3. International Partnerships

6.3.1. Independent Regulators Group

Via its participation in the Independent Regulators Group (IRG), EETT continued its cooperation with its European partners aiming at further developing the unified Electronic

97. Decisions, Recommendations and References.

Table 8
Ranking of the EU Member States in the ECTA Scorecard Studies for the Years 2005-2008

2008		2007		2006		2005	
United Kingdom	373	United Kingdom	385	United Kingdom	390	United Kingdom	440
The Netherlands	362	The Netherlands	381	Denmark	356	Denmark	398
Norway	360	Denmark	341	France	345	France	349
Denmark	344	Norway	320	The Netherlands	344	Austria	339
France	322	France	304	Sweden	306	Ireland	327
Ireland	302	Italy	284	Italy	300	Italy	311
Italy	302	Sweden	284	Spain	295	Sweden	311
Finland	300	Portugal	279	Hungary	293	Portugal	300
Portugal	286	Spain	277	Ireland	290	The Netherlands	296
Austria	282	Finland	263	Portugal	275	Spain	291
Hungary	282	Ireland	261	Finland	266	Hungary	286
Germany	280	Austria	258	Austria	266	Belgium	281
Spain	266	Germany	253	Czech Republic	251	Czech Republic	244
Sweden	265	Hungary	240	Belgium	248	Poland	230
Belgium	254	Slovenia	238	Germany	231	Germany	220
Slovenia	251	Belgium	229	Greece	224	Greece	218
Greece	247	Greece	216	Poland	203		
Czech Republic	190	Czech Republic	204				
Poland	180	Poland	196				
Turkey	140						

Communications market. As a matter of fact, there are 45 NRAs of the Electronic Communications market participating in the IRG.

2008 was a pivotal year for the IRG, as it was the year during which the procedure for its establishment as a legal entity under Belgian Law was completed and the IRG is now seated in Brussels. The administration of this new institution is assumed by a Boarding Council comprised by Presidents of the NRAs that participate in the IRG, serves a one-year term, and is elected by the Plenary of the Presidents of the IRG's

NRAs. Its operation is supported by a secretariat and by an internal communication platform (IRGNet) that was put into operation in 2008. Through these developments, the IRG becomes a more efficient and cohesive organization with an increased potential to contribute to the development and the completion of the European Electronic Communications market. EETT is one of the 33 founding members to have signed the memorandum for the IRG's establishment as a legal entity and actively participates in it.

During 2008, IRG continued, among other things, its study

and commentary of the proposals made by the European Commissioner for Information Society and the Media, Mrs. Vivian Reding, regarding the review of the existing European Regulatory Framework for Electronic Communications. In this context, in October 2008, at the close of the Summit's proceedings in Dublin, the I/ERG issued a joint statement, regarding the recent developments of the consultations in the European Council and the European Parliament. The main points of the statement are the following:

- I/ERG maintain that according to experience so far, the independence of the NRA is of vital importance for the proper and effective operation of the new regulatory framework. Under that scope, it lauds the Report of the European Parliament which approved the amendments the European Commission proposed for the Framework Directive and aiming at strengthening the independence of the NRAs.
- I/ERG welcome the dialogue concerning future institutional regulations and especially the need for the NRA to play a central role in achieving better harmonization of the regulatory framework.
- The proposal to institutionalize a model of cooperation among the NRAs through a cohesive structure, with tasks focused on regulatory issues and the NRAs having the control of their daily operations, benefits considerably from the shared experience of the NRAs and relies on the effective model of cooperation that is already implemented within the I/ERG.
- I/ERG consider that any review of the regulatory framework should reflect the climate of a constant and fertile cooperation, not only among the NRAs but also between the NRAs and the European Commission.
- I/ERG restate the principle that the NRAs are the ones who have the relevant experience to define and apply regulatory measures adjusted to the national markets and that the final regulatory decisions should continue to be taken at a national level.

Furthermore, within the framework of IRG, in December 2008, EETT hosted in Athens a meeting of the working group for issues of safety network and information (Network and Information Security), while it participated in the working groups looking into consumer issues.

6.3.2. European Mediterranean Regulators Network

The NRAs for Electronic Communications of the Euro-Mediterranean countries proceeded with the establishment of the Euro-Mediterranean ERG (EMERG), in order to bolster neighboring cooperation and facilitate the exchange of

experiences. The Summit for the signing of the foundation act was held at the beginning of July in Malta, with the participation of EETT which is one of the founding members of the Network.

The goals of EMERG are, inter alia:

- The creation of a viable Electronic Communications market for the benefit of consumers and enterprises.
- The bridging of the digital gap by rendering the benefits of the Society of Information accessible to everyone, especially by providing the US.

Under the scope of strengthening Euro-Mediterranean regulatory cooperation, the EMERG network will launch an ambitious programme of activities that will include:

- 1) The joint analysis of progress and development of the markets and the regulatory frameworks in the region (benchmarking).
- 2) The promotion of a coordinated approach in the regulating methodology and the harmonization with the principles of the EU framework.
- 3) Joint efforts at the local level for transferring knowledge and exchanging information, in order to achieve a common direction.
- 4) The promotion of bilateral partnerships.

6.3.3. Forum of European Supervisory Authorities for Electronic Signatures

EETT actively participated in 2008 in the Forum of European Supervisory Authorities for Electronic Signatures (FESA), within the framework of its regulatory and monitoring responsibilities for Electronic Signatures. The purpose of the forum was the cooperation among the relevant organizations, the exchange of views and the development of joint positions on issues arising from the implementation of Electronic Signatures.

6.3.4. Cooperation with Regulatory Authorities

In April of 2008, EETT signed a Cooperation Memorandum with the Office of the Commissioner of Electronic Telecommunications and Postal Regulation of Cyprus (OCECPR) regarding regulation and competition issues in the areas of Electronic Communications and Postal Services. The Cooperation Memorandum aims, inter alia, at the exchange of information and know-how between the two countries in matters of monitoring, regulation, and competition; at the coordinated and uniform implementation of the Community Regulatory Law; at dealing with important issues regarding

the respective sectors of the two countries effectively; and the development of the Telecommunication and Postal Market for the benefit of the national economies of Greece and Cyprus.

Additionally, in June 2008, a Memorandum between EETT and the Telecom Regulatory Authority of India (TRAI) was signed, aiming at promoting cooperation between the two NRAs in fields such as the regulation of the Electronic Communications market, the legal and regulatory framework, and the promotion of innovation in the sector of Information Technology and Communication.

6.4. Goals

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

- Ongoing cooperation with the European Commission and international organizations on issues that fall within its jurisdiction in Electronic Communications and Postal Services.
- More active presence and provision of the necessary support to the MTC and generally the Greek State for the representation of the country in European and international organizations.
- Ongoing participation in and contribution to the shaping of the regulatory developments in the Electronic Communications sector, primarily through the ERG and the IRG.
- Promotion of cooperation among NRAs at the regional level and development of bilateral partnerships, especially in the Balkans and the Mediterranean. EETT aspires at becoming the cooperation bridge between the IRG/ERG and the NRAs of regional countries, through the transmission of know-how and the exchange of experiences over liberalization issues.
- Strong presence and participation in European and international events in the radio communications sector.
- Systematic monitoring of European developments in spectrum and radiofrequency issues.
- Contribution to the shaping of the European developments in the Postal Services sector through the active participation in the workings of the CERP and PDC Committees.



7. EETT: Organisational Development



7.1. Internal Organization

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

7.1.1. Organizational Structure

EETT consists of:

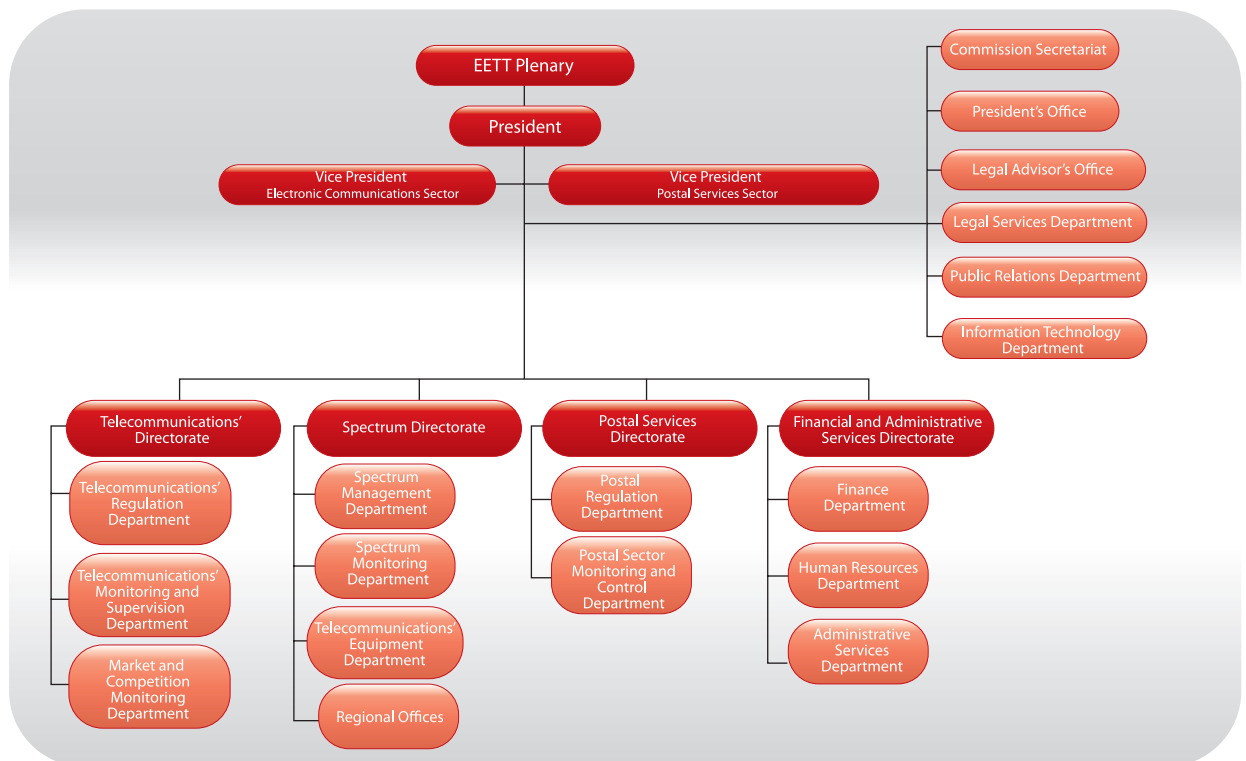
- A nine-member Committee comprised of the President,

the Vice-President for Electronic Communications, the Vice-President for Postal Services and six more Members. The President and the Vice-Presidents are selected and appointed by the Ministerial Council, upon the proposal of the Minister of Transport and Communications and the opinion of the Parliament's Committee on Institutions and Transparency. The rest of EETT's members are appointed by the Minister of Transport and Communications.

- The Legal Advisor.
- The Scientific Experts.
- The Permanent Personnel.

The organizational structure of EETT is presented analytically in Chart 1.

Chart 1
EETT's Organizational Chart



7.1.2. Human Resources

At the end of 2008, EETT's personnel totalled 217 employees, compared to the 173 employees at the end of 2007.

Out of the above, 146 were employed on a permanent basis (i.e., held a permanent position) and 68 were External Associates – Members of Working Groups. Additionally, 3

seconded policemen were serving at EETT to meet the needs of the Spectrum Monitoring Department.

The evolution of EETT's human resources is presented in Figure 8 and the number of employees per personnel category in Table 9.

Figure 8
Evolution of EETT's Human Resources, 2001-2008

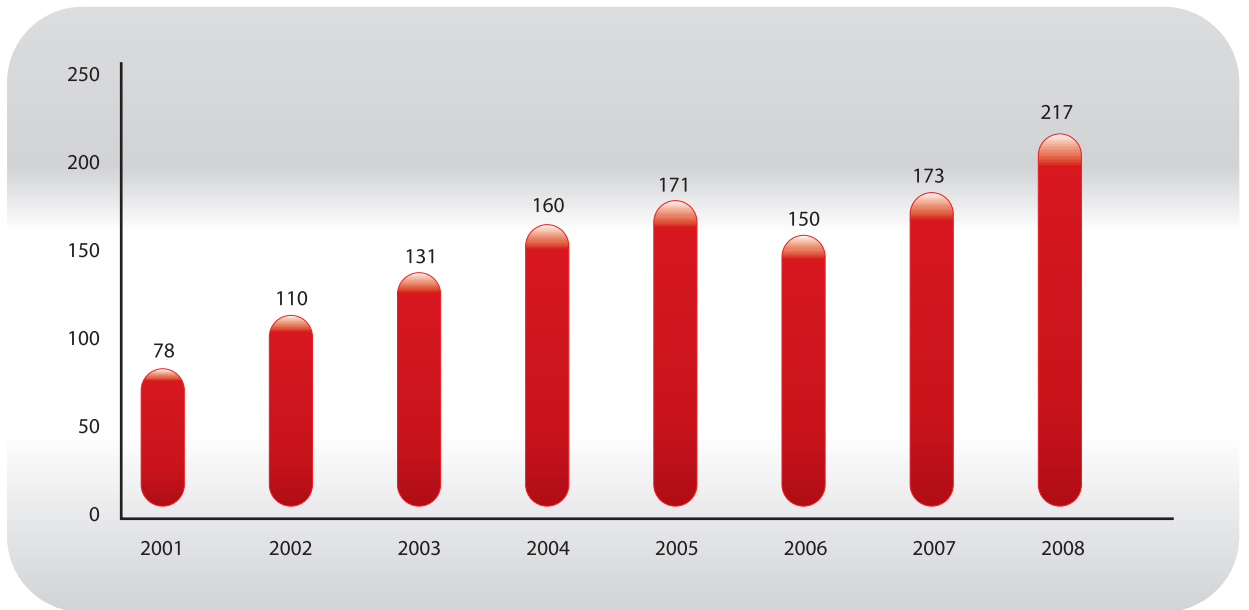
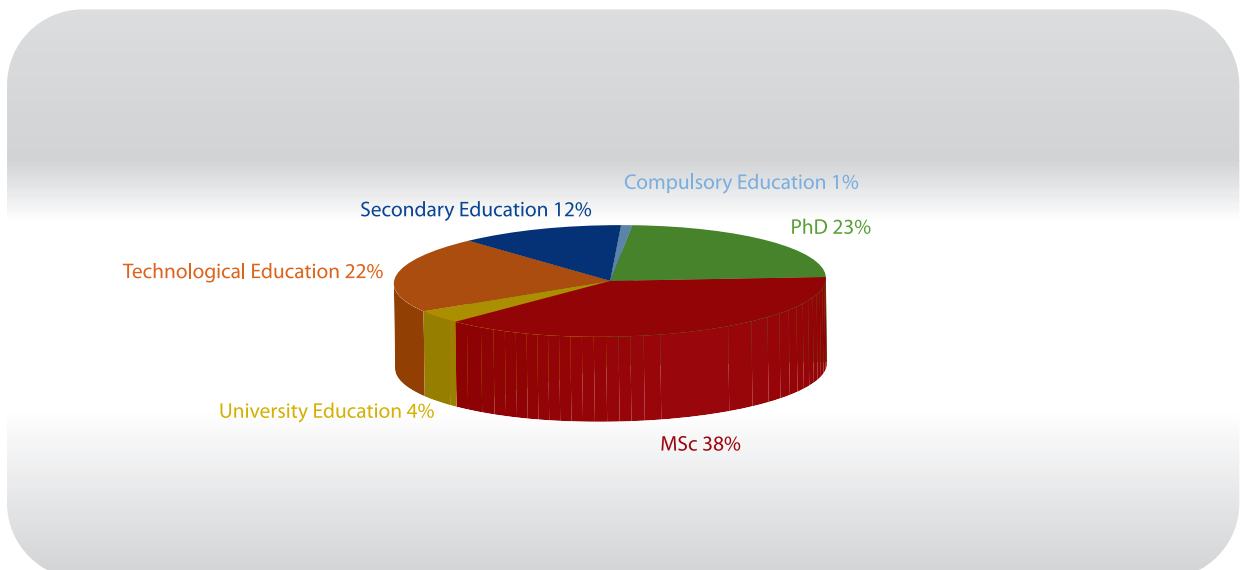


Table 9
Number of Employees per Personnel Category, 2001-2008

PERSONNEL CATEGORY	2001	2002	2003	2004	2005	2006	2007	2008
Scientific Experts	37	56	69	64	70	69	85	83
Permanent Personnel	21	35	42	42	63	66	68	66
Temporary Personnel	0	0	0	34	0	0	0	0
External Associates (Members of Working Groups)	20	19	20	20	38	15	20	68
TOTAL	78	110	131	160	171	150	173	217

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

Figure 9
Educational Level of EETT Personnel



7.1.3. Education Programme for EETT Employees

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

The education programme implemented during 2008 consisted of the following subjects:

- 1. Operation of Regulatory Authorities:** The training focused on institutional, legal, and economic issues that EETT deals with as a Regulatory Authority.
- 2. State-of-the-art technologies:** This section entails training in new technologies in the fields of Radiocommunications, Spectrum, and Electronic Communications.
- 3. Use of Modern Information Systems:** The employees were trained and also specialized in information management systems and applications as well as in using the EETT Integrated Information System (IIS).
- 4. Financial Analysis and Management:** Training and information on financial issues, payroll, financial management, and accounting.
- 5. Managerial skills:** Development of skills for the improvement of administrative support, internal and external communication, provision of services to citizens, human resources and projects management as well as for ensuring the quality of the procedures followed and services provided by EETT.

In total, 15 education programmes were carried out on a budget of approximately 150,000 euros. All EETT personnel participated while a significant number of employees participated also in international conferences and seminars. It should be noted that an important part of this education programme was funded by the Operational Programme for the Information Society (OPIS), which is part of the 3rd Community Support Framework (CSF III).

Specifically, with regard to the employees of the Postal Directorate, their education included, among other things, the following visits to:

- The Sorting Centre of Universal Service Provider (USP) in Athens.
- The Sorting Centre of the USP at the Athens International Airport (AIA).
- The Sorting Centres of two international postal service

providers abroad.

- The facilities of a courier operator in the AIA used for distributing international incoming / outgoing mail.

7.1.4. Interest in the employees

Services of Health and Safety

With a view to guaranteeing the safety and health of its workforce, EETT offers its personnel the services of a health and safety inspector and of a work doctor, in cooperation with an external health and safety service associate. This initiative aims at minimizing professional risks and preventing workplace accidents and diseases by taking the necessary measures and keeping the employees informed.

Indeed, EETT receives all additional measures in order to improve the working conditions following the recommendations of the safety inspector and in cooperation with the Health and Safety Committee, which is consisted of its employees. Moreover, all the employees are informed regularly by the inspector and the work doctor about the individual precautions they take during working hours.

Free ADSL

As of 2006, EETT offers free ADSL connections to the homes of its employees. In this way, they become familiar with up-to-date methods of Internet access and enjoy all the benefits of broadband Internet, with regards to research, information, and communication. At the end of 2008, all EETT employees had a high quality and speed connection.

Operational Programme for the "Information Society"

During 2008, EETT continued implementing projects that are included in the OPIS, which is part of the CSF III. Currently, the following projects are implemented in the framework of OPIS:

- Implementation of the EETT IIS.
- Implementation of the National Spectrum Management Monitoring System (NSMMS) – A' phase.
- Education – training of EETT employees.

These projects are expected to be completed by the end of 2009.

In total, 10 projects, consisting of 15 sub-projects, have been incorporated into the OPIS. Out of those, 11 projects have already been completed and 4 are at an implementation stage and will be completed by the end of 2009.

7.2. Integrated Information System

Within 2008, the EETT IIS was put into operation. It is an ambitious project aiming at upgrading EETT's operation and improving the quality of services provided to consumers in the Electronic Communications and Postal Services markets. The project aims at:

- Improving the productivity / efficiency of the personnel.
- Reinforcing the prospects of horizontal cooperation among the executives and the administrative units of EETT.
- Upgrading the information mechanisms and possibilities.
- Improving the services that EETT provides to the citizens and to the cooperating organizations.

The IIS consists of the following four sub-systems:

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

The benefits of the IIS became obvious at the very beginning of its functional operation. In combination with other administrative interventions of EETT, the efficiency in the assignment and management of documents improved by almost 100% in comparison to 2007. In particular, the management of issues regarding consumers and companies improved by 60%.

The main target for the use of the IIS in 2009 is the full digitalisation of the circulation of EETT documents via the use of the Electronic Signature.

EETT's IIS is co-funded by the OPIS of the CSF III. The European Fund for Regional Development (ERDF) funds about 80% of this project.

7.3. Website

The EETT website constitutes a central reference point for the publication of information concerning EETT's mission and the markets of Electronic Communications and Postal

Services, in general. In 2008, EETT restructured its website which enabled it to:

- **Improve its content:** In this context, its website was enriched with new sections such as "For journalists", "Events / Conferences", "Press Interviews", "Participating in reports", as well as new themes such as "The responsibilities of EETT over consumer issues", "For which matters EETT is not responsible", "Procedure for filing a complaint".
- **Upgrade its appearance:** The new website has a modern graphic design which is stylish, friendly, and compatible with EETT's corporate image.
- **Upgrade its structure:** The new website organizes and sorts out information according to the category of visitor (Consumers – Providers – Journalists) and according to the service (Electronic Communications – Postal Services). In this way, it responds better to the needs of the different kinds of visitors. The re-organization has expanded to other areas of its context as well, thus improving the linking of the theme sections.
- **Improve its usefulness:** The new structure will facilitate the web browsing of visitors. The number of choices on the central menu has been limited, while the more recent news appears on the central page in a rotating text. At the same time, the new website was developed according to the guidelines of the Web Accessibility Initiative (WAI) of the Worldwide Web Consortium (W3C), so that it may become more easily accessible by handicapped people. Indeed, for persons with sight problems, the new website provides operations of content enlargement and is compatible with the Voice Browsers possibility.
- **Providing new possibilities and services:** The renewed web site provides instant information via the Really Simple Syndication (RSS) which is a technology that allows the user to instantly become informed of the latest news (Press Releases and Announcements) that are posted on the EETT website without having to visit it constantly. Furthermore, the new website provides the "Video Streaming" service for multimedia transmission in real time and the "Video on Demand" service for choosing, retrieving, and presenting an audiovisual context (such as a video-recorded lecture or presentation).
- **Instant publication of information from applications or data of the EETT IIS:** The new website cooperates with the IIS database from where it obtains data that appear instantly without human intervention. Currently, the operations of instant information publication include the registries of networks providers and services of Electronic Communications, postal operators, registrars of domain names as well as those of the assigned and engaged numbers of the National Numbering Plan (NNP).

In 2008, EETT used its website to post the events that it organized for the year. Specifically, in spring 2008, it created

a special section devoted to the “3rd International Conference for Broadband Network”. In the same context, it launched a banner for the “Broadband Forum: Dialogue for broadband development” and provided information on activities such as the first participation of EETT to the Thessalonica International Fair.

The number of visitors to EETT’s website continued to increase during 2008 exceeding 445,700 in comparison to the 410,000 visitors of the previous year. The largest volume of traffic was registered in the sections “Numbering”, “List of registrars”, “Latest News through RSS”, “Search Engine”, EETT’s contact details, and the registries of postal operators and providers of Electronic Communications Networks and Services. Among the main theme sections, the ones visited more often were “Information about Consumers” followed by “Telecommunications”.



Image 1
The EETT Website

7.4. Goals

Regarding its internal operation and information support, EETT has set the following goals:

- Cover its needs in high level human resources. To this end, EETT will take all necessary actions to conclude recruitment procedures for the hiring of 26 persons, as Special Experts and 7 in-house lawyers.
- Find new and better premises for EETT’s headquarters in Athens, in cooperation with the Hellenic Public Real Estate Corporation.
- Find and rent new premises for the Thessalonica offices, which will cover immediate housing needs.
- Utilization of the IIS’s potential by focusing on the full digitalisation of the electronically circulated documents of EETT via an electronic signature.
- Enhancement of the EETT website with interactive services so as to inform consumers in a better and more efficient way.
- Implementation of the Geographic Information System (GIS) on the EETT website aiming at informing the user about the broadband services that are offered in his/her area and the anticipated quality of connection.
- Run a pilot GIS application for the plotting of the telecommunication fibre networks, in the big cities at least, aiming at informing all the interested organisations.
- Implementation of a voice system for the provision of services and information to consumers.
- Development and operation of an Information Security Management System aiming at the complete and systematic management of sensitive information and the risks which threaten it so that the information handled by EETT may be safe.
- Creation of an electronic platform for those companies wishing to file requests for the granting of radiofrequency rights of use.



8 . Appendices



8.1. Greek Legislative Regulatory Framework (01-01-2008 to 31-12-2008)

8.1.1. Laws, Presidential Decrees and other Legislative Acts

Joint Ministerial Decision (JMD) 44867/1637 «Taking Measures for end-users with disabilities», GG Issue 1667/B/18-08-2008.

8.1.2. Regulatory Texts

Number Of Decision	Title	GG Issue
504/099/2008	Extension of the launch day for the operation of a consumer information system, in virtue of article 7, par.7, of EETT Decision 488/82/2008 «Code of Practice for the Provision of Electronic Communications Services to Consumers».	2654/B/30-12-2008
491/027/2008	Determination of price cap and sub-cap for the regulated retail access services and telephone services according to EETT Decisions respectively.	1615/B/12-08-2008
488/082/2008	Code of Practice for the Provision of Electronic Communications Services to Consumers.	1505/B/30-07-2008
491/026/2008	Regulation for determining the form of the subscribers' directories by implementing par.3 of article 48 of Law 3431/2006, as well as the way and the cost for the disposal of subscribers' data by the providers in the context of providing directory services to the public, in implementation of paragraph 6, article 48, Law 3431/2006.	1622/B/13-08-2008
481/018/2008	Regulation for the determination of the Rights of Use of the Radiofrequency Spectrum for legal radiocommunications stations based in the fire-stricken areas of 2007 and operating on a permanent basis.	1066/B/9-07-2008
482/051/2008	Methodologies / Cost-orientation and Accounting Separation Principles for materializing the regulatory obligations of price control, cost-orientation and accounting separation imposed on OTE in the individually defined Electronic Communications markets and other regulations.	1151/B/24-06-2008
480/017/2008	Regulation for the Quality Indicators of the Electronic Communications services provided to the public (EETT Decision 480/017/13-05-2008).	1153/B/24-06-2008
478/114/2008	Amendment of the Carrier Pre-selection Regulation (EETT Decision 478/114/06-05-2008).	1106/B/13-06-2008
478/115/2008	EETT Decision 478/115/06-05-2008 «Approval of OTE's 2007 Reference Offer for the Wholesale Line Rental, by implementing EETT Decision 411/017/2006 (GG Issue 1873/B/28-12-2006)» (GG Issue 988/B/28-05-2008).	988/B/28-05-2008
477/002/2008	Approval of OTE's Reference Offer for the Provision of Part Circuits, by implementing EETT Decision 401/014/06-09-2006 (GG Issue 1419/B/2007).	987/B/28-05-2008
476/010/2008	Decision regarding i) the definition of a National Wholesale Market for Call Termination on the Public Telephone Network of ON TELECOMS S.A., the determination of operators with Significant Power in this Market and their obligations; and ii) the Amendment of Appendix I of EETT Decision 406/34/11-10-2006 (GG Issue 1669/B/2006).	976/B/27-05-2008
473/008/2008	Amendment of EETT Decision 296/49/24-10-2003 «Regulation for the Notification of Radioequipment to EETT».	933/B/21-05-2008
476/014/2008	EETT Decision 476/014/23-04-2008 «Results of the Hellenic Telecommunications Organization S.A. (OTE S.A.) 2008 cost audit (actual data as of 2006) (GG Issue 904/16-05-2008)».	904/B/16-05-2008
472/170/2008	Regulation for determining performance goals in the provision of the Universal Service, the content and the form of the published information as well as the publication way for the operators responsible for providing the Universal Service.	885/B/14-05-2008
472/171/2008	Approval of the «Collocation Regulation», by implementing par.3, article 30, Law 3431/2006.	885/B/14-05-2008

474/052/2008	Delegation of EETT's authorities to the President of EETT.	711/B/23-04-2008
472/157/2008	Approval of the Regulation for Granting Rights of Channels Use to TV Stations of National Coverage which have a licence of foundation and operation according to the defined in article 4 of Law 1866/1989 and to TV Stations of Regional and Local Coverage that fulfill the conditions and the requirements of article 17 of Law 2644/1998 and the context for their use by implementing Law 3548/2007.	711/B/23-04-2008
472/154/2008	Approval of the final interface texts according to article 4.1 of the PD 44/2002.	667/B/16-04-2008
470/037/2008	Approval of OTE's Reference Offer for the provision of Wholesale Leased Lines by implementing EETT Decision 401/014/06-09-2006 (GG Issue 1419/B/2007).	498/B/20-03-2008
470/038/2008	Amendment of Provisions of OTE's Reference Offer for Local Loop Unbundling and Relevant Facilities, by implementing EETT Decision 388/012/31-05-2006 that was approved by EETT Decision 429/015/04-04-2007.	490/B/19-03-2008
469/024/2008	Amendment of the Amounts of the Regulation for contracting Supply, Services and Studies Contracts of EETT.	424/B/13-03-2008
491/055/2008	Rendering authorization to the President of EETT for summoning operators to a Hearing and the determination of the relevant committees for conducting them.	1935/B/19-09-2008
493/023/2008	Change in the staff of the EETT's Regional Office in Thessalonica.	1996/B/25-09-2008
496/051/2008	Amendment of the Provisions of EETT Decision 470/037/04-03-2008 «Approval of OTE's Reference Offer for the provision of Wholesale Leased Lines, by implementing EETT Decision 401/014/06-09-2006 (GG Issue 1419/B/2007)» (GG Issue 498/B/20-03-2008).	2116/B/14-10-2008
498/046/2008	Market Definition for the Call Termination to Individual Mobile Networks, determination of operators with Significant Power in this Market and of their Obligations.	2260/B/05-11-2008
499/092/2008	Approval of retail minus percentages for the Wholesale Line Rental (WLR) services by implementing EETT Decision 411/017/22-11-2006.	2404/B/26-11-2008
499/093/2008	Examination of OTE's proposal regarding the introduction and expansion of the commercial disposal of economic voice programmes as those were notified to EETT via OTE's letter 1838/F.960/20-06-2008.	2289/B/11-11-2008
499/094/2008	Removal of the block to the international destinations Nauru (00 674); Solomon Islands (00677); Wallis and Futuna (00 681); Kiribati (00686); Guinea-Bissau (00245); Sao Tome and Principe (00239); and information provision according to verse xvi, article 12, Law 3431/2006.	2404/B/26-11-2008
504/145/2008	Approval of the Regulation for General Licences.	46/B/19-01-2009
505/058/2008	Redefinition of the Target Price, as defined in virtue of EETT Decision 459/135/14-11-2007, (GG Issue 2342/B/11-12-2007), by implementing the defined in EETT Decision 406/34/11-10-2006 «Market definition for the wholesale Interconnection of Public Fixed Networks, determination of operator with Significant Power in those markets and their obligations», (GG Issue 1669/B/14-11-2006).	2706/B/31-12-2008

8.2. Glossary

TERM	EXPLANATION
Active Subscribers	The term “active subscribers” refers to all subscribers under contract or prepaid status, who have contributed to the generation of income during the last three months. The specific income may be either retail (call or SMS/ MMS, etc.) or wholesale (call reception or SMS/ MMS, etc.).
Administrative Cooperation (ADCO)	Committee responsible mainly for the support of actions related to the common resolution of problems and the exchange of experiences in issues of Radio and Telecommunications Terminal Equipment (RTTE) market surveillance.
ADSL	Broadband technology that uses the existing copper cable of telephony connections to achieve higher data transmission rates (and the simultaneous voice transmission).
Broadcasting	Transmission of sound and/or optical signals (programs) to a broad number of recipients (audience or viewers).
Call Termination	The Electronic Communications service where one of the contracting parties (the one providing the service) terminates to its network a call coming from the network of the other contracting party.
Carrier Pre-selection	The option given to OTE subscribers, if they so wish, to select as a default the operator who will process one or more categories of calls (international, local, national, and calls to mobile phones). This option eliminates the requirement to dial the specific 4-digit or 5-digit code, as in the case of Carrier Selection.
Carrier Selection	The option offered to OTE subscribers to make calls through another operator by dialling a special 4-digit or 5-digit Carrier Selection Code assigned to the specific operator before the desired number.
Certification Service Providers (CSP)	Individuals or legal entities or other carriers issuing certificates or providing other services, with respect to the Electronic Signatures.
Charter of Obligations to Consumers (COC)	The providers rendering Postal Services under a General Authorization must prepare a COC to include (a) a description of characteristics of the provided service and the time limits within which it is provided, (b) information for users on prices, based on the data affecting them including expected improvement of service quality, (c) the Dispute Resolution Committee with the participation of a users representative and right of attendance for the interested user (consumer). The COC also contains all other necessary information in relation to the characteristics of the Postal Services providers, the obligations and commitments to users, the management of postal items, user service, and potential compensation.
Co-migling	Refers to the capability of allocation of an Electronic Communications operator’s equipment in a space within OTE’s Local Exchanges, where the related equipment of OTE is hosted without partitions or a separate room for the operator. The maintenance and operation of the operator’s equipment is done by the operator.
Comité Européenne de Réglementation Postale (CERP)	A committee founded in 1992 in the frame of CEPT (European Conference of Postal and Telecommunication Administration) and deals with postal issues.
Comprehensive Directory	The directory including fixed and mobile telephony numbers of all operators’ subscribers.
Dialers	Dialers are software that can be transmitted through the Internet and can be installed in the computer of the consumer. This software changes the settings of the consumer’s modem from one internet address to another. Usually, the change is from the common number of the Internet Service Provider (ISP) that the consumer uses, to a high cost number, either of a 90X XXX XXXX series or a number abroad (00X XXX XXXX).
Discounted Cash Flow Methodology	An economic approach to analyze the return of an investment within a time period. This approach takes into account the time value of money by calculating the value of the future cash flows at their present value.
Dependent Stations (in satellite services)	Terrestrial stations whose access to the space section is realised under the control and supervision of a terrestrial infrastructure station.
Distant Collocation	Form of collocation, in the framework of OTE’s legal obligations, an Electronic Communications operator obtains access to OTE sources through connecting cables.
Domain Names	An alphanumeric element which individualizes a computer connected to a network or group of computers connected to a network, according to the principles of the Internet Domain Name System.
Double Play Services	The term that is used in Electronic Communications for the provision of a narrowband service (telephony) and a broadband service (Internet) through a single broadband connection.
European Conference of Postal and Telecommunications Administrations (CEPT)	It was founded in 1959 by 19 countries. Today it encompasses 48 member states and covers almost all of the geographical area of Europe. Its activities include commercial, administrative, regulatory, and technical standardization issues.
European Regulators Group (ERG)	The ERG consists of the 25 European Union National Regulatory Authorities (NRAs), and 8 observer NRAs (Bul-

garia, Switzerland, Iceland, Croatia, Lichtenstein, Norway, Romania, and Turkey). ERG aims at encouraging collaboration and coordination between NRAs and the European Commission, in order to promote the development of the internal market for Electronic Communications of networks and services. In parallel, it seeks consistent implementation by all member states of the provisions laid down in the Directives of the European Regulatory Framework.

Express Delivery Voucher (EDV)	Document accompanying the postal item, containing identification data.
Fixed Service (Radiocommunications)	Radiocommunications service which includes wireless Electronic Communications networks between specified fixed points for the implementation of which the radiofrequencies are used.
Frequency Map	Imprint of the available channels for use at a specific geographic location and under preset circumstances.
Fully Distributed Cost (FDC)	The costing method according to which all the cost elements, including the indirect cost, are distributed to the generated products or the provided services through a total of algorithms.
Fly Away	Easily portable equipment that allows for the quick satellite link to distant areas for transferring data, sound, and picture.
Geographic Information Systems (GIS)	The Geographic Information System abbreviated as GIS, is an address system for spatial data and correlated properties. In the strictest sense, it is a digital system capable of intergrading, storing, editing, analysing, and displaying geographically-referenced information. In a broader sense, it is a "clever map" tool that enables its users to create questions interactively (searches created by the user), analyze the spatial data, and adapt it. The main GIS feature is that it operates with geographic coordinates contrary to other systems of vector design (CAD).
Geographic Numbers	The numbers whose prefix denotes the geographic location of the number holder.
Granting of Frequency Rights of Use	Authorization provided to a person, for the commencement of use of a radioelectric station with a specific radio-frequency or a specific radio electric channel, at a particular location and with particular technical characteristics.
Greek Single Access Number (GRAN)	It is a special call number that enables the user to connect to Internet from everywhere in Greece, by ensuring a cheaper telephone charge than the charge for a normal telephone call. The GRAN applies to both the PSTN and ISDN networks.
Imaginary Number	The number that one-way defines the specific twisted pair of copper cable which ends up at the subscriber, denoting the local loop ID.
IMT Systems	Technology which includes "IMT-2000", the family of standards for 3 rd Generation mobile telephony, recognised by the International Telecommunication Union (ITU) with the common name "3G" (UMTS), as well as "IMT Advanced" which includes the family of standards for 4 th Generation - "4G" - mobile Electronic Communications systems through which the wireless mobile broadband access to cellular architecture can be provided everywhere.
Incremental Cost	The incremental cost of a service. It defines usually the lowest value that a service can be charged for, provided that only the cost that changes in relation to the provision of the service in the short term is included and assuming that the portfolio of services of the Significant Market Power (SMP) Electronic Communications operator does not present any alteration in its provision.
Independent Regulators Group (IRG)	The IRG was established in 1997, as an informal group of European NRAs, aiming at the exchange of views, experiences, and practices among its members concerning issues of common regulatory interest. Taking into account the composition of the official group of ERG by the European Commission in 2002, IRG currently plays a symbolic role.
Information Security Management System	Total and systematic management of the sensitive information and the dangers that threaten it, in order to protect the information received. It includes information systems, procedures and roles.
Interconnection	The physical and logical connection of Electronic Communications networks of the contracting parties in order to provide users with the ability to communicate with each other or with users of a third party, or in order to have access to services provided by a third party.
Interconnection Link	The link between OTE's switching centre (node) and the switching centre of an Electronic Communications provider which enables Interconnection.
Interference	The result of an unwanted action due to one or more transmissions, radiations, or inductions during reception to a radiosystem, demonstrated as any fall in performance, wrong interpretation or loss of information, which would have been received had this unwanted action not taken place.
International Incoming Traffic	The total traffic terminating to an operator's network, originating from foreign operators.
International Outgoing Traffic	The total traffic originating from an operator's network, terminating at foreign operators.
Internet Protocol Version 4 (IPv4)	IPv4 uses 32-bit (four-byte) addresses, which limits the address space to 4,294,967,296 (2 ³²) possible unique addresses. However, some are reserved for special purposes such as private networks (about 18 million addresses) or multicast addresses (about 16 million addresses). This reduces the number of addresses that can be allocated as public Internet addresses. As the number of addresses available is consumed, an IPv4 address shortage

	appears to be inevitable. This limitation has helped stimulate the push towards IPv6, which is currently in the early stages of deployment and the only contender for replacing IPv4.
Internet Protocol Version 6 (IPv6)	In IPv6, the new standard (but of not extended use yet) Internet Protocol, the addresses are 128-bit, which, even after a generous netblocks assignment, will be sufficient in the near future. Theoretically, there will be 2128 or about $3,403 \times 1038$ unique addresses for host interfaces. This large amount of addresses will be allocated gradually, a fact that will render the codification of more routing information to the same addresses possible.
Link	The total of telecommunications equipment required for the implementation of the connection between two points of a Electronic Communications network.
Local Loop	The circuit that connects the terminating point of each subscriber with the main distributor in the OTE Local Exchange.
Long Run Average Incremental Cost (LRAIC)	The costing method according to which the total long-run average incremental cost of a service equals the difference deriving when from the total cost of an undertaking providing a total of services, we subtract the total cost of the undertaking if it continues offering all the services excluding the specific one.
Mobile Service	Radio service between Mobile Stations and Land Stations or between Mobile Stations.
Multimedia Services	Electronic Communications services that concern information/ content transmission in Electronic Communications networks. The invoicing of the multimedia services is effected through the charging of numbering resources of the National Numbering Plan (NNP), and mainly series 901, 909, 14, 190-195, and 54. The services include audiotext services, videotext, SMS value-added services and MMS value-added services. The provision of multimedia services can also take place through Internet.
National Incoming Traffic	The total traffic terminating to an operator's network, originating from the networks of other domestic fixed or mobile telephony operators.
National Outgoing Traffic	The total traffic originating from an operator's network, terminating to the networks of other domestic fixed or mobile telephony operators.
National Reference Database on Number Portability (NRDNP)	Database that processes the exchange of information between operator -donor and operator- recipient for the implementation of Portability applications and sends to all operators the information required to route calls to the transferred numbers.
National Radiofrequencies Registry (NRFR)	A data base including the total radiofrequencies assigned at the national level.
National Numbering Plan (NNP)	Rules defining the structure of numbers used by Electronic Communications operators for the provision of services to users.
Next Generation Networks (NGN)	Packet Switching networks for the provision of broadband Electronic Communications services based on multiple access and backbone technologies (reaching high-quality levels). Furthermore these technologies could provide continuous service coverage to the user and access to more than one service operators simultaneously (if desired).
Non - Geographic Numbers	All numbers except for the geographic ones, namely the numbers whose prefix does not denote the geographic location of the holder.
Number Portability	The option given to consumers to maintain their telephone number when changing operator.
OKSYA (Integrated Central ADSL Service Connection)	The OKSYA service offers a connection with GigabitEthernet (GE) access interfaces, STM-1 POS, and ATMs, and is available in the following types: Local – Regional – Central. The Local OKSYA is available at Points of Presence (POPs) where BRAS are installed for routing ADSL traffic from all BRAS nodes in a particular Area (POP) to the facilities of a Telecommunications Service Provider.
Physical Collocation	Form of collocation according to which OTE in the framework of its legal obligations constructs a special space in its Local Exchanges which is provided to Electronic Communications operators for the installation of equipment.
Premium Rate Service	A call whose charge is higher than the maximum normal charge for geographic numbers within the country with part of increased charge received by the operator who is assigned this number.
Private Mobile Radio (PMR)	The term describes professional radio networks of land mobile service used to meet communication needs of various professional users, such as communication networks of transport companies, radiotaxis, security companies, and emergency services such as the Fire Brigade or the National First Aid Centre (EKAV).
Quad Play Services	The term used in Electronic Communications for the provision of a narrow band service (telephony) and two broadband services (Internet and TV) through a single broadband connection and mobile telephony services.
Radio Aids	The telecommunication systems of the Civil Aviation Authority (CAA) providing the pilots with information on the command of the aircraft.
Radio Communications Service	A service including transfer, transmission and/or reception of radio waves for special telecommunications

purposes.

Radio Equipment	Equipment which includes transmitter and/or receiver and provides communication through radio waves through the use of spectrum.
Radio and Telecommunications Terminal Equipment (RTTE)	See Radioequipment, Telecommunications Terminal Equipment.
Really Simple Syndication (RSS)	A technology that enables the Internet user to be informed instantly of the latest news published on a website without having to visit this website continuously.
Reference Interconnection Offer (RIO)	The reference document used as a basis for the Interconnection contract among OTE and other operators. This document is released by OTE and approved by EETT.
Reference Unbundling Offer (RUO)	The reference document used as a basis for the contract signed for Local Loop Unbundling (LLU) provision by OTE to other operators. This document is released by OTE and approved by EETT.
Retail Minus Regulation	It is the imposition of a price control obligation based on a retail-minus coefficient. It relates to a mechanism used for defining the regulated charges of wholesale services (upstream), based on the prices of similar or relevant retail services (downstream) of the regulated operator.
Satellite Services	Services whose provision is based in whole or in part on the installation and operation of earth satellite stations networks. These services include, as a minimum, radio link via earth satellite stations with the space part (up-links) and radio link between the space part and earth satellite stations (downlinks).
Shared Access Service	A call the cost of which is shared between caller and callee, given that the charge does not exceed the maximum normal charge of a national call.
Services Ancillary to Broadcasting	They involve services of radio-TV program transmission from production point to the transmission network or the network for the coverage of an athletic event, an external performance, or any other urgent event. For the coverage of such events radio equipment, such as wireless cameras and microphones as well as portable microwave links and voice transmission systems, is required.
Service Free of Charge	Call for which the caller is not charged.
Significant Market Power (SMP)	An enterprise is considered to hold Significant Market Power when, either individually or in cooperation with other enterprises, it holds a position equivalent to a dominant position, i.e. financial power which allows it to operate to a great extent independently from the competition, the customers, and the consumers.
Special Postal Items Track and Trace System (SPITTS)	Information system for tracking and tracing postal items.
Telecommunications Terminal Equipment	Equipment intended to be connected directly or indirectly by any means whatsoever to Electronic Communications networks (mobile telephony networks, public analogue and digital telephony networks and data networks) used for the provision of publicly available Electronic Communications services.
Telecommunications Conformity Assessment and Market Surveillance Committee (TCAM)	Committee established to assist the European Commission and to issue opinions in relation to monitoring tasks with regard to the application of Directive 99/5/EC. Provided that it considers it worthwhile, the Committee issues guidelines on various matters.
Telemetry	The use of Electronic Communications for the automatic indication or recording of measurements performed at a distance from the measurement instrument.
Terrestrial Satellite Stations	Stations with provisions of control and supervision that constitute the core of providing satellite services. Examples of this category are the stations transmitting radio – TV programmes, such as the HUB stations in VSAT TDM/TDMA networks etc.
Transit	The service in which one of the two contracting parties transits a call from the network of the other party to a third party network.
Triple Play Services	The term that is used in Electronic Communications for the provision of a narrow band service (telephony) and two broadband services (Internet and TV) through a single broadband connection.
Universal Service in the Postal Services sector	The right granted to Postal Services users, regardless of their location in the Greek Territory, to permanently and affordably enjoy special quality Postal Services. The Universal Service in the Postal Services sector includes: a) the collection, transportation, sorting and distribution of postal items up to 2 kg; b) the collection, transportation, sorting, and distribution of postal parcels up to 20 kg; c) services of registered mail and deliveries with declared value. The US includes both national and cross-border services.
Universal Service in the Electronic	The provision of a fixed set of basic Electronic Communications services available to all citizens of Greece,

Communications sector	regardless of their geographic location, at affordable prices.
Universal Service Provider – USP (in the Postal Services sector)	The operator designated by the Greek State with the obligation to ensure provision of the Universal Postal Service. Hellenic Post (ELTA) is the current USP.
Universal Service Provider – USP (in the Electronic Communications)	The operator designated by the Greek State with the obligation to ensure provision of the Universal Service in Electronic Communications.
Very Small Aperture Terminals (VSAT)	Station terminals with small aperture antenna.
Video on Demand	It is a system that allows users to select and watch/listen to video or audio content on demand.
Video Streaming	Multimedia transmission in real time.
Virtual Collocation	Refers to the capability of collocation of an Electronic Communications operator's equipment in a space within OTE's Local Exchanges, where the related equipment of OTE is hosted, for purposes of full or shared LLU. The maintenance and operation of equipment is done by OTE.
Voice Browser	It is a software application which enables a user to display and interact with text, images, videos, music, games, and other information typically located on a web page or a local area network.
Voice over Internet Protocol (VoIP)	It is a general term for a family of transmission technologies for delivery of voice communications over IP networks such as the Internet or other packet-switched networks contrary to the circuit switching used in the traditional telephone. This technology allows call-making via the Internet.
Web Accessibility Initiative (WAI)	It is an effort to improve the accessibility of the World Wide Web for people with disabilities launched by the World Wide Web Consortium (W3C) in 1997. It has several working groups, cooperates with organizations throughout the world and develops guidelines and resources in order to render the World Wide Web accessible to people with disabilities.
Wireless Fidelity (Wi-Fi)	Wireless local network which uses radio frequencies to transmit and receive data, based on the IEEE 802.11 standards group.
World Interoperability for Microwave Access (Wi-MAX)	Wireless network, which uses radio frequencies to transmit and receive data, based on the IEEE 802.16 standards group.
World Wide Web Consortium (W3C)	It is the main international standards organization for the World Wide Web. It is arranged as a consortium where member organizations maintain full-time staff for the purpose of working together in the development of standards for the World Wide Web. Analytically, it develops cross-functional technologies (specifications, directives, software, and tools) aiming at fully utilizing the World Wide Web.

8.3. Abbreviations

ABC	Activity Based Costing
ADAE	Hellenic Authority for the Information and Communication Security and Privacy
ADCO	Administrative Cooperation Group
ADSL	Asymmetric Digital Subscriber Line
AGCOM	Autorità per le Garanzie nelle Comunicazioni
AIA	Athens International Airport
B2B	Business To Business
B2C	Business To Consumers
CEPT	Conference of European Postal and Telecommunications Administrations
CERP	Comité Européenne de Réglementation Postale
COC	Charter of Obligations to Consumers
COCOM	Communications Committee
CPI	Consumer Price Index
CPG	Conference Preparatory Group
CPM	Conference Preparatory Meeting
CSP	Certification Service Provider
CSF III	3 rd Community Support Framework
CSSTS	Consumer Service Sector for Telecommunications Services
DCF	Discounted Cash Flow
DCS	Digital Communication System
DEI	Public Power Company
DSLAM	Digital Subscriber Line Access Multiplexer
DNSSE	Domain Name System Security Extensions
DRC	Dispute Resolution Committee
ECC	Electronic Communications Committee
ECN	European Competition Network
ECTA	European Competitive Telecommunications Association
ECTRA	European Committee for Regulatory Telecommunications Affairs
EECMA	European Electronic Communications Market Authority
EETT	Hellenic Telecommunications and Post Commission
EFRD	European Fund for Regional Development
EKAV	National First Aid Centre
EKPOIZO	Consumers' Association – The Quality of Life
ELAS	Hellenic Police
ELOT	Hellenic Organization for Standardization
ELTA	Hellenic Post
EMERG	Euro-Mediterranean ERG
EMY	Hellenic National Meteorological Service
ERG	European Regulators Group
ETA	Environmental Terms Approval
ETSI	European Telecommunications Standards Institute
EU	European Union
EUTELSAT	European Telecommunications Satellite
EVDAF	National Reference Data Base on Number Portability
FDC	Fully Distributed Cost
FESA	Forum of European Supervisory Authorities for Electronic Signatures
FMS	Fixed Monitoring Stations
FTTC	Fiber To The Cabinet
FTTH	Fiber To The Home
GAEC	Greek Atomic Energy Commission
GCS	Greek Computer Society
GDP	Gross Domestic Product
GIS	Geographic Information Systems
GMDSS	Global Maritime Distress and Safety System
GPS	Global Positioning System
GRAN	Greek Single Access Number
GR-NET	Greek Research and Technology Network
GSM	Global System for Mobile Communications
HICS	Hellenic Institute of Customer Service
HPREC	Hellenic Public Real Estate Corporation
ICC	Internal Connecting Cable
IMT	International Mobile Telecommunications
INKA	General Association for Greek Consumers

IPC	International Post Corporation
IPTV	Internet Protocol Television
IPv4	Internet Protocol Version 4
IPv6	Internet Protocol Version 6
IRG	Independent Regulators Group
ISDN	Integrated Services Digital Network
ISP	Internet Service Providers
ITU	International Telecommunication Union
ITU-R	International Telecommunication Union – Radiocommunication Sector
JMD	Joint Ministerial Decision
KEPKA	Centre for the Protection of Consumers
KPIs	Key Performance Indicators
L/E	Local Exchange
LLU	Local Loop Unbundling
LRAIC	Long Run Average Incremental Cost
MD	Ministerial Decision
MIS	Multimedia Information Services
MMS	Mobile Monitoring Stations
MMS	Multimedia Messaging Service
MNERA	Ministry of National Education and Religious Affairs
MTC	Ministry of Transport and Communications
MTO	Mobile Telephony Operators
NCRTV	National Council for Radio and Television
NFAT	National Frequency Allocation Table
NGA	Next Generation Access
NGN	Next Generation Network
NGO	Non Governmental Organizations
NNP	National Numbering Plan
NNRT	National Network on Research and Technology
NRA	National Regulatory Authority
NRR	National Radiofrequencies Registry
NSMMS	National Spectrum Management and Monitoring System
NSSG	National Statistical Service of Greece
NTRA	National Telecommunications Regulatory Authority (NRA of Egypt)
NTUA	National Technical University of Athens
OCECPR	Office of the Commissioner for Electronic Communications and Postal Regulation
OPIS	Operational Programme for the Information Society
OSN	One Stop Notification
PCM-4	Pulse Code Modulation for 4 Channels
PDC	Postal Directive Committee
PIBs	Principles of Implementation and Best Practice
PMMS	Premium Multimedia Messaging Services
PMR	Private Mobile Network
PPN	Public Postal Network
PSMS	Premium Short Message Services
PMR	Private Mobile Radio
PT1	Project Team 1
RBO	Reference Broadband Offer
RIO	Reference Interconnection Offer
RFID	Radio-Frequency Identification
RLAN	Radio Local Area Network
RSC	Radio Spectrum Committee
RSPG	Radio Spectrum Policy Group
RSS	Really Simple Syndication
RTTE	Radio and Telecommunication Terminal Equipment
RUO	Reference Unbundling Offer
SHF	Super High Frequency
SLA	Service Level Agreements
SMP	Significant Market Power
SMS	Short Message Service
SNG	Satellite News Gathering
SPITTS	Special Postal Items Track and Trace System
SRDs	Short Range Devices
TCAM	Telecommunications Conformity Assessment and Market Surveillance Committee
TIF	Thessalonica International Fair

TRAI	Telecom Regulatory Authority of India
TRIS	Technical Regulations Information System
UHF	Ultra High Frequency
UMTS	Universal Mobile Telecommunications System
UPU	Universal Postal Union
US	Universal Service
UWB	Ultra Wide Band
VAT	Value Added Tax
VoIP	Voice over IP
VSAT	Very Small Aperture Terminals
W3C	World Wide Web Consortium
WAI	Web Accessibility Initiative
WAS	Wireless Access System
WBA	Wholesale Broadband Access
WCRM	Wholesale Customer Relationship Management
WGFM	Working Group Frequency Management
WGFM PT22	Working Group Frequency Management Project Team 22
WGFM PT44	Working Group Frequency Management Project Team 44
Wi-Fi	Wireless Fidelity
Wi-Max	World Interoperability for Microwave Access
WLR	Wholesale Line Rental
WRC	World Radiocommunication Conference
WRP _{AD}	Weighted Retail Price with Actual Data

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