

ANNUAL REPORT 2010



EETT

HELLENIC TELECOMMUNICATIONS & POST COMMISSION



HELLENIC TELECOMMUNICATIONS & POST COMMISSION

Annual Report 2010

Maroussi, 2011

Administration – Composition of EETT

The present Annual Report delineates the actions of the Hellenic Telecommunications and Post Commission (EETT) for the period from January 1 to December 31, 2010. During this period, the composition of the EETT Plenary was the following:

Leonidas Kanellos

President

Angelos Syrigos

Vice-President for the Electronic Communications Sector

Michael Sakkas

Vice-President for the Postal Services Sector

Constantine Delikostopoulos

Member

Panagiotis Kottis

Member

Ioannis Papaioannou

Member

Nikolaos Papaoulakis

Member

George Papapavlou

Member

Ioannis Tzionas

Member

Table of Contents

I. Message from the President	8
II. EETT's Brief Profile	10
III. Structure	11
Introduction	12
1. The Consumer at the Center of Developments	16
1.1. Consumer Service Sector	17
1.2. EETT's Interventions to Benefit the Consumer	21
1.3. Informative Actions	23
2. Electronic Communications Sector	24
2.1. Market Analysis based on the European Regulatory Framework	25
2.2. Promoting and Ensuring Fair Competition in Networks and Services	27
2.2.1. Interconnection	27
2.2.2. Local Loop Unbundling	27
2.2.3. Reference Offer for Wholesale Broadband Access	28
2.2.4. The Model of Economic Space between Local Loop Unbundling and Wholesale Broadband Access	28
2.2.5. Ensuring the Provision of the Universal Service	28
2.2.6. Inspections of Electronic Communications Providers	29
2.2.7. Examination of OTE's Bundled Services / Packages - Model of Analysis	30
2.2.8. Readjustment of Regulated Prices	31
2.2.9. Competition Issues	31
2.2.10. Carrier Pre-Selection	32
2.2.11. Number Portability	32
2.2.12. Cost Accounting Audits	33
2.2.13. Accounting Separation	34
2.2.14. Electronic Signature	34
2.2.15. Domain Name Assignment	34
2.2.16. Wholesale Leased Lines	35
2.2.17. Wholesale Rental of Public Telephone Network Access Line	35
2.2.18. Collocation	36
2.2.19. National Numbering Plan	36
2.2.20. Electronic Submission of General Authorizations and Numbers	36
2.2.21. Premium Rate Services	37
2.2.22. Regulation on International Roaming	37
2.2.23. Identification of Anonymous Users of Pre-Paid Telephony	38
2.2.24. Determining the Minimum Level of Itemized Billing for Public Telephone Services	38
2.3. Broadband Development	38
2.3.1. The Progress of Broadband in Greece	38
2.3.2. Next Generation Access Networks	39
2.3.3. Broadband Quality Measurements Node	40
2.3.4. Liberalization of the Use of the GSM 900 Spectrum for UMTS Services	40
2.3.5. Regulation on Access Network Frequency Plan	40
2.3.6. Convergence of Telecommunications and Media	41
2.4. EETT's Controlling and Monitoring Actions	42
2.5. Goals	43



3. Radiofrequencies Spectrum Sector	44
3.1. Spectrum Management and Monitoring	45
3.1.1. Fixed Service	45
3.1.2. Satellite Services	46
3.1.3. Mobile Service	47
3.1.4. Ancillary Services to Broadcasting and Programme Making	48
3.1.5. Radio and Television	50
3.1.6. Air Navigation and Other Governmental Service Networks	51
3.1.7. Radio Amateurs	51
3.2. Antenna Mast Constructions	51
3.2.1. Evolution of the Licensing Process	51
3.2.2. Illegal Mobile Telephony Antenna Installations	51
3.2.3. Conducting a Study on the Procedures of Licensing, Installing and Operating Antenna Mast Constructions	52
3.3. Radio and Telecommunications Terminal Equipment	52
3.3.1. Update of Radio Interfaces	52
3.3.2. Market Surveillance	52
3.4. National Spectrum Management and Monitoring System	52
3.5. EETT's Controlling and Monitoring Actions	52
3.6. Goals	53
4. Postal Services Sector	54
4.1. Development of the Postal Market and Consumer Protection	55
4.1.1. Participation in Drawing Up the Draft Law on Organization of the Postal Services Sector	55
4.1.2. Ministerial Decision for Licensing Private Trucks	55
4.1.3. Submitting Proposals to the MITN for the Regulation on the Pricing Principles of the Universal Service	56
4.1.4. Draft Ministerial Decision for Consumer Compensation	56
4.1.5. Annual Report on the Postal Market	56
4.1.6. Implementation of the GIS Application for Post Offices	58
4.1.7. Electronic Submission of Applications for Postal Service Providers	58
4.1.8. Meeting with Representatives of the Market	58
4.2. Ensuring the Quality of the Universal Service	58
4.2.1. Redefining the Quality Specifications and Terms of Provision of the Universal Service	58
4.2.2. Universal Service Quality Measurements 2010	58
4.2.3. Improvement of the Terms of Distribution in Problematic Areas and Predetermined Points	61
4.2.4. Adoption-Implementation of a New Cost Accounting Model for ELTA	61
4.2.5. Market Research for the Universal Service	61
4.3. EETT Controlling and Monitoring Actions	62
4.3.1. Inspections	62
4.3.2. Deletions	62
4.3.3. Access to the Public Postal Network	62
4.4. Goals	62
5. National and International Collaborations	63
5.1. Collaborations at National Level	64
5.1.1. Hellenic Competition Commission	64
5.1.2. Ministry of Citizen Protection	64
5.1.3. "Digital Greece 2020" Forum	64

5.2. International Collaborations	65
5.2.1. Body of European Regulators of Electronic Communications	65
5.2.2. Independent Regulators Group	65
5.2.3. European Competition Network	65
5.2.4. European Mediterranean Regulators Group	66
5.2.5. European Regulators Group for Postal Services	66
5.2.6. Universal Postal Union	66
5.2.7. Postal Directive Committee	67
5.2.8. Comité Européen de Reglementation Postale	67
5.2.9. Other Official Committees	67
5.3. Goals	68
6. Organisational Development	69
6.1. Internal Organisation	70
6.1.1. Organisational Structure	70
6.1.2. Human Resources	71
6.1.3. Training Program for EETT's Employees	73
6.1.4. Employee Care	73
6.2. Website	73
6.3. Videoconference Systems	75
6.4. Financial Data	76
6.5. Goals	77
7. Appendices	78
7.1. The Greek Legislative-Regulatory Framework (01-01-2010 to 31-12-2010)	79
7.2. European Regulatory Framework	82
7.3. Glossary	82
7.4. Abbreviations	88
7.5. Index of Charts, Tables and Pictures	91





I. Message from the President

During 2010, the Greek Electronic Communications market continued to converge with the respective European market, despite the grave fiscal crisis afflicting the country. On December 21, 2010, broadband penetration reached 19.9% over the population, compared to 17% on December 31 of the previous year. Even though the growth rate of broadband shows a relative decline as compared to 2009 due to the crisis, it remains among the highest in Europe. According to the European Commission, the rise of penetration by 2.9 lines per 100 inhabitants in 2010 is the second highest among the EU member states and double compared to the European average. At the same time, the rise in nominal internet access speeds and the reduction of the cost of broadband access services continued, along with the provision of innovative bundled services in communications, access and audiovisual content to the consumers.

This positive development in the market must be credited first and foremost to the commercial activities and investment initiatives of the providers. However, such progress would not have been possible without EETT's continuous and coordinated regulatory and monitoring interventions. Its actions aim at promoting broadband, upgrading internet infrastructures, protecting investments, defending consumer rights and ensuring fair competition in the market.

To this end and in the framework of the second round of market analysis, EETT completed the analysis of wholesale interconnection markets, on the one hand, and of retail markets for calls at a fixed location, on the other. Also, the Authority approved OTE's Reference Offers for Wholesale Broadband Access (WBA) and the provision of Wholesale Leased Lines, while amended the Regulation on the management and assignment of numbering resources of the National Numbering Plan (NNP). Furthermore, in the context of its monitoring tasks, EETT carried out inspections on Electronic Communications operators and examined the economy programs submitted by OTE, approving 50 and rejecting 5 out of a total of 55 submitted programs. In line with its competences as a Competition Commission and in full accordance with current practices in the rest of Europe, EETT issued a "Leniency Program" aiming at a favorable legal treatment of those who contribute in identifying and dealing with cartels in the sectors it supervises.

Handling with sensitivity the issues related to consumer protection, EETT placed again at the top of its agenda, initiatives and actions for protecting consumer rights. In 2010, the Independent Authority amended the Code of Practice on Premium Rate Services (PRS) with the introduction of stricter provisions aiming at reducing cases of consumer fraud and imposing stricter sanctions for overcharging due to the consumers' subscription to certain services without

their knowledge. With a view to serving consumers faster, EETT proceeded to amend the Regulation on Number Portability, reducing significantly the time required for satisfying the request of operator switchover by fixed and mobile telephony clients. In addition, EETT continued to respond promptly and consistently to consumer complaints and requests through the Consumer Service Sector (CSS), which has processed more than 20,000 complaints within the year. This particular channel of continuous and open communication with consumers not only contributes to the faster resolution of problems which were not resolved by the providers (transfer of lines, charges, unsatisfactory service etc.), but also provides to EETT valuable information, thus stimulating regulatory and disciplinary interventions on problems with a high frequency of recurrence.

In the radiofrequency management sector, EETT continued to grant rights of wireless network operation for providing Electronic Communications to the public, operating private mobile radio networks or meeting its own communication needs. Additionally, EETT processed a great number of applications for licensing and/or modifying antenna mast constructions, while it continued to update the frequencies registry for television broadcasts. In the context of its monitoring actions, EETT carried out a great number of inspections either ex officio or subsequent to complaints about interferences, illegal broadcasting and illegal installations of radio-television stations and antennas. More specifically, with regard to mobile telephony antennas, EETT established a working group for conducting a study and formulating proposals aiming at the simplification of the licensing and installation procedures for base stations, the specification of the competences of the bodies involved, the encouragement of antenna collocation and the improvement of the licensing procedure through automated on-line applications. Aiming at enhancing transparency, EETT posted on its website, all its Decisions on antenna licensing. Also, EETT continued to conduct inspections on the Radio and Telecommunications Terminal Equipment (RTTE) market (terminals, telephones, transceivers, games for children etc.), imposing sanctions in all cases of introducing, handling and trading equipment that does not fulfill the standards of the current European and Greek legislation.

The transition to terrestrial Digital Television was a key strategic issue for EETT in 2010. As a result, our Authority proceeded to mobilize the Greek Government in terms of the need for simplifying the current regulatory framework for accelerating the transition to Digital Television, if not within the European landmark year of 2012, then at least within 2013 and much before the deadline of 2015 set by the International Telecommunications Union (ITU). At the same time, EETT supported the need for distinguishing between the roles of



network and content provider. This distinction is expected to significantly facilitate the operation of the radio-television market, saving valuable resources for the audiovisual industry and promoting the effective monitoring of the spectrum by EETT, in order to avoid harmful interferences to its legally licensed users. What is more, the fast completion of the transition can also bring significant social and economic benefits from the utilization of the "digital dividend", i.e., the frequencies to be liberalised thanks to the use of digital technology, allowing for a more cost-effective management of the radio spectrum as a scarce national resource. Lastly, EETT organized its 5th International Conference on "New Generation Access Networks: Unleashing the Potential for the Citizen and the Economy", inviting prestigious speakers from Greece and abroad in order to convey best practices and international experience, contributing substantially to the national dialogue on our country's broadband strategy.

With regard to the Postal Services sector, it is true that as we approach the full liberalization of the postal market in Greece (01-01-2013), significant developments are under way that will determine its future. By taking actions and cooperating closely with the Ministry of Infrastructures, Transport and Networks (MITN), EETT is making all possible efforts so that the "day after" will ensure an effective and sustainable Universal Service and a postal market capable of growing in a healthy environment in terms of competition and entrepreneurship. In this perspective, EETT contributed significantly in 2010 to the legislative initiatives adopted by the MITN, such as the drawing up of a Draft Law on the Organization of the Postal Services Sector, in view of the liberalization of the postal market until December 31, 2012, and the publication of a Ministerial Decision (MD) for redetermining the quality specifications and the terms of provision of the Universal Service (US), as well as the MD on the Registration of Private Trucks. Also, EETT took important actions in order to ensure the smooth operation of the postal market, such as submitting proposals to the MITN on the Regulation of the Pricing Principles of the US, approving the cost accounting model of the Hellenic Post (ELTA), measuring the quality of the US, improving the terms of mail delivery in problematic areas and predetermined points, and drawing up and submitting a draft amendment of the MD on consumer compensation in case of deficient provision of service. These issues were discussed in an one-day conference on the postal market organized by EETT with the participation of representatives from companies operating in that market as well as from the European Commission.

Apart from its multifaceted regulatory, monitoring and supervising work, EETT can boast of a dynamic presence at the level of national and international relations. In

2010, EETT's President was unanimously elected by the Regulatory Authorities of the 27 EU member states and the European Commission to the Vice-Presidency of the newly established Body of European Regulators of Electronic Communications (BEREC). This election is an effective recognition of EETT's role and authority at the European level, increasing the significance of its interventions in the formation of the common strategy for the single European market in Electronic Communications. Additionally, EETT has developed a broad range of relations and partnerships with both international Independent Authorities and with international organizations, actively participating in the meetings of the Independent Regulators Group (IRG), the European Competition Network (ECN) and the Euro-Mediterranean Regulators Group (EMERG). Also, in the Postal Services sector, EETT was a founding member of the European Regulators Group for Postal Services (ERGP), which aims at contributing decisively for the establishment of a single postal market in Europe. At the national level, EETT continued its close cooperation with other Independent Administrative Authorities (the Hellenic Competition Commission, the Greek Ombudsman, the Consumer Ombudsman, etc.) as well as with governmental bodies, while actively supporting the Inter-Ministerial Forum on "Digital Greece 2020".

Economic and technological conditions in the telecommunications and postal market are rapidly changing. The regulatory environment is being reshaped and is constantly adapting to new developments. The current critical conjuncture demands careful actions, positive interventions, flexibility and decisiveness, in order to ensure a smooth transition to a better tomorrow without exclusions and with equal opportunities for all. We are ready to assume the enhanced regulatory and monitoring role reserved for EETT. In a period of historical challenges for our country's future, the Independent Authority remains a permanent, reliable and effective guarantor of legality in the sectors under its supervision. Defending the interests of consumers, ensuring impartial conditions of fair competition and keeping up with technological developments, EETT has a vision and a strategy and remains an ally to the consumer and a supervisor of the smooth operation of the markets, to the benefit of the employees of all companies in the telecommunications and postal sectors with no exception and more broadly, to the benefit of Greece's economy.

Dr. Leonidas I. Kanellos

EETT President

May 2011



II. EETT's Brief Profile

EETT (Hellenic Telecommunications and Post Commission) is the Independent Authority that acts as the country's National Regulator, by monitoring, regulating and supervising: (a) the Electronic Communications market, which comprises the activities of fixed and mobile telephony, wireless communications and Internet access providers, and (b) the postal market, which comprises the activities of Postal Services and Courier Service providers. Moreover, EETT is entrusted with the competences of the Competition Committee that relate to those markets.

Originally formed by Law 2075/1992 under the name National Telecommunications Committee (EET), our Authority began operation in the summer of 1995, with its competences focused on the supervision of the

liberalized telecommunications market. However, once Law 2668/1998 on the organization and operation of the Postal Services sector was enacted, EET was also entrusted with the responsibility of supervising and regulating the Postal Services market, and was renamed as Hellenic Telecommunications and Post Commission (EETT).

Law 2867/2000 enhanced EETT's supervisory, monitoring and regulatory roles, while the currently applicable Law 3431/2006 on Electronic Communications, which incorporates the latest provisions of European law, defines the framework for the provision of Electronic Communications networks and services and related facilities in Greece, and further expands EETT's competences.



III. Structure

The administrative body of EETT is the Plenary, which consists of 9 members: the President, two Vice-Presidents respectively competent for the sectors of Electronic Communications and Postal Services, and 6 Members. All Plenary members enjoy full personal and operational independence in exercising their duties.

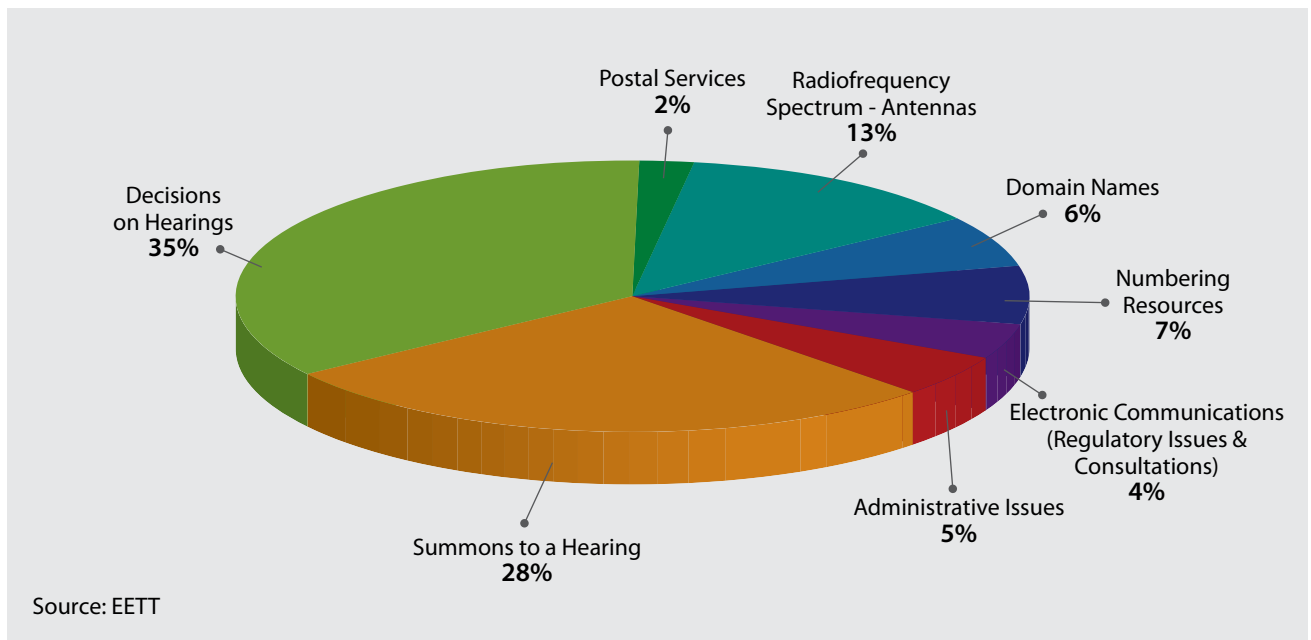
According to Law 3371/2005, the President and the two Vice-Presidents are selected and appointed by the Council of Ministers, following a recommendation by the Minister of Infrastructures, Transport and Networks (MITN) and an opinion issued by the Special Permanent Parliamentary Commission for Institutions and Transparency. The rest of the members are appointed by the Minister of Infrastructures, Transport and Networks. All individuals selected are persons of established authority who stand out thanks to their scientific expertise and professional skills in the technical, economic, or legal sectors. All EETT members serve four-year terms. No member can be appointed for more than two consecutive terms.

As a rule, the EETT Plenary attends regular weekly meetings. In 2010, it held 42 meetings and reached a total of over 2,400 Decisions, while it imposed fines amounting to 17,443.249 euros in total. Chart I presents a detailed thematic breakdown of EETT Plenary Decisions.

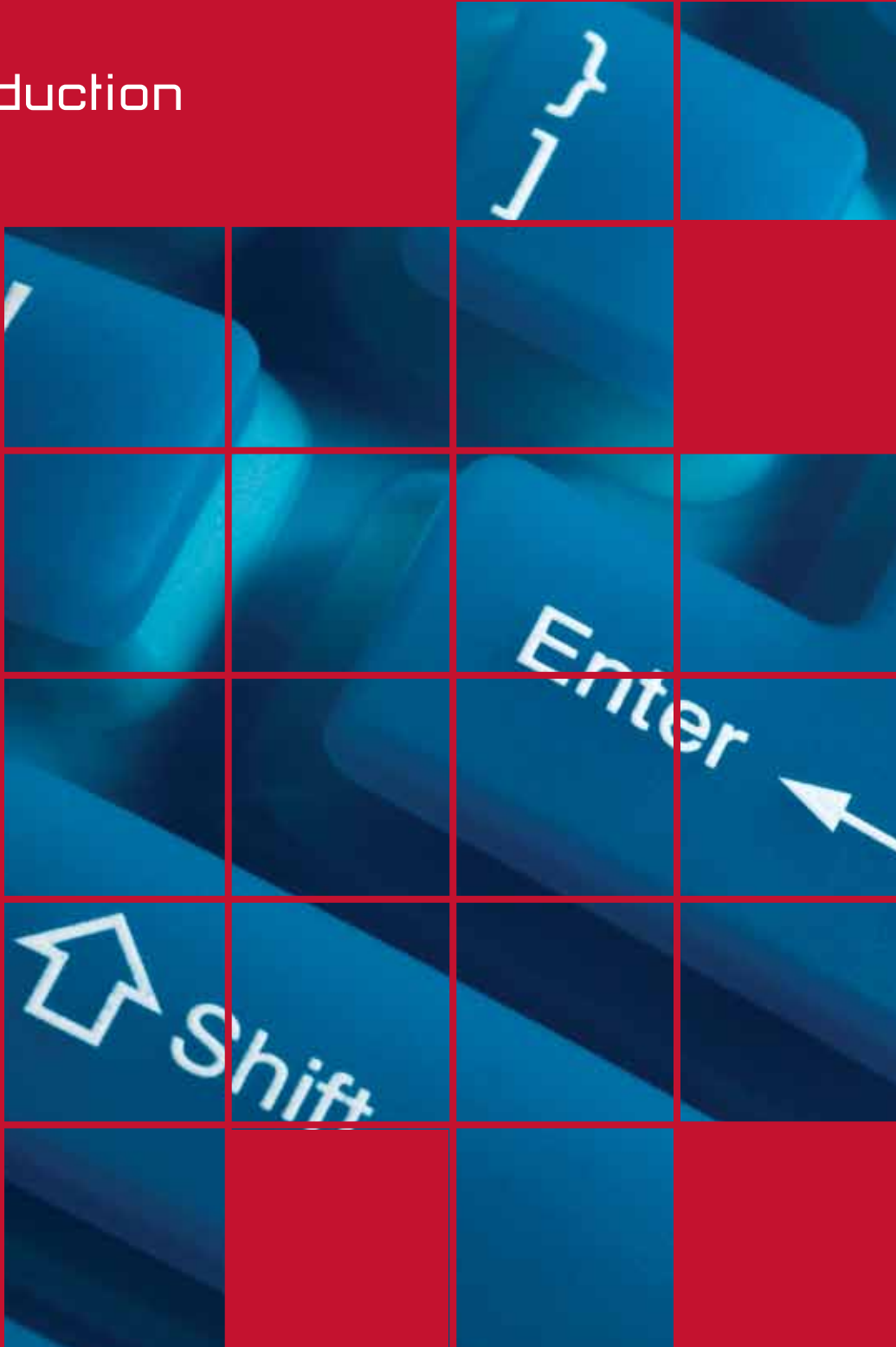
The agenda of the Plenary meetings as well as all EETT Decisions are posted on its website and the governmental website of "Clarity". Decisions related to regulatory acts are published in the official Government Gazette (GG).

Within the context of regularly reporting on EETT's work to Parliamentary Committees, EETT Administration was invited in June 2010 to a Hearing before the Special Permanent Parliamentary Commission for Institutions and Transparency. Among other things, discussions during the Hearing touched upon issues relating to the impact of digital transition and the prospects of utilizing the digital dividend that will derive from the liberalization of frequencies, in order to develop next generation services.

Chart I
Plenary Decisions by Subject



Introduction



Electronic Communications Sector

In the course of 2010, EETT's activities focused on two main pillars, ensuring fair competition, on the one hand, and protecting consumer interests, on the other.

In this perspective and with regard to the first pillar, EETT analyzed Wholesale Interconnection markets and Retail Call markets in the context of the second round of market analysis. At the same time, it approved OTE's Reference Offers for Wholesale Broadband Access (WBA) and the provision of Wholesale Leased Lines, the amendment of the Regulation on the Management and Assignment of Numbering Resources of the National Numbering Plan (NNP), and after taking into consideration the views of the market, it organized Public Consultations for modifying the Regulations on the Management and Assignment of Domain Names and Collocation. Additionally, in the context of its supervisory tasks, EETT conducted a series of audits on Electronic Communications operators and published the "Leniency Program", which outlines the terms and conditions for writing off or reducing the fines of operators that contribute to the investigation of cases of violation of competition rules. Furthermore, for better service the Electronic Communications operators, EETT launched a new internet application on its website for the submission of electronic applications with regard to Electronic Communications services (e.g., General Authorization, Electronic Signature certification, Domain Names registration etc.).

Furthermore, EETT continued its activities for the development of Broadband by taking actions for the implementation of the principles outlined in the Recommendation of the European Commission on the development of Next Generation Access Networks (NGAs). Additionally, other important actions were the liberalization of the use of the GSM 900 spectrum for the development of mobile communications networks and the publication of Regulations on Frequency Management and Power Injection in the access network as well as the access to the Application Program Interfaces (API) and the Electronic Program Guides (EPG).

With regard to consumer protection, EETT took a series of actions for the effective protection of consumer rights. Among other things, it modified the Code of Practice for Premium Rate Services (PRS) by introducing stricter provisions with regard to the obligations of PRS providers in order to deal with cases of consumer fraud. Also, EETT modified the Number Portability Regulation by reducing the time required for Number Portability in both fixed and mobile telephony from 10 working days to 3 working days after the submission date of the relevant request by the subscriber. Another important action was the publication

of the Regulation on determining the minimum level of itemized billing for Public Telephone Services, aiming at informing consumers in written form through their bill and controlling their charges. Also, in the framework of defending the rights of people with disabilities, EETT put to Public Consultation a draft Recommendation to the Ministry of Infrastructures, Transport and Networks (MITN) about modifying the Joint Ministerial Decision (JMD) aiming at specifying the categories of the entitled persons with disabilities and the competent Committees for the certification of disabilities. Finally, EETT's Consumer Service Sector (CSS) continued its effective operation, given that during 2010 it handled and processed more than 8,300 written complaints and 11,000 phone requests/complaints by consumers in total.

Radiofrequency Spectrum Sector

Aiming at the optimal technical and financial management of the radiofrequency spectrum, EETT continued in 2010 to consistently fulfill its responsibilities with regard to licensing, supervising and controlling the spectrum. In this way, EETT ensures the optimal availability of this scarce resource, benefiting both competition and consumers.

In this framework, based on the Regulation on the Terms of Use of Individual Radiofrequencies or Radiofrequency Bands, EETT continued in 2010 to grant radiofrequency rights of use for operating wireless networks for providing Electronic Services to the public or for covering the operator's own telecommunications needs, while it also granted radiofrequency rights of use for the operation of special Radio Networks.

Furthermore, EETT processed a great number of requests for licensing and/or modifying antenna mast constructions and also conducted a relevant study in order to promote changes, wherever necessary, to the existing legal framework, with a view to improving the procedure for licensing, installing and operating antenna mast constructions. In the television frequencies sector, by virtue of Law 3548, EETT had been entrusted as early as 2007 with the responsibility of granting rights of use mainly to television stations of national coverage and, during 2010, it continued to update the frequency registry for television broadcasts.

With regard to radio-television spectrum monitoring, EETT received numerous complaints relating to interferences and illegal installations of radio-television stations and antennas. In addition to conducting inspections and registrations on its own initiative, EETT imposed, when necessary, administrative sanctions on the operators involved after having summoned them to a Hearing. In



2010, EETT continued to cooperate closely with the Civil Aviation Authority (CAA) to ensure a more effective and faster response to the large number of problems that air navigation networks face, setting as a priority the unimpeded operation of wireless networks related to the protection of human life as well as to public and national security.

Finally, during 2010, EETT continued to conduct audits on the Radio and Telecommunications Terminal Equipment (RTTE) market and imposed relevant sanctions on the circulation of equipment not complying with existing legislation, with a view to avoiding harmful interferences and protecting the user's health and safety.

Postal Services Sector

In 2010, the EETT's two main strategic pillars of action in the Postal Services Sector focused on the development of the postal market and consumer protection, as well as on ensuring the quality of the Universal Service (US). In order to ensure the smooth operation of the postal market and the compliance of postal operators with the existing regulatory framework, EETT submitted proposals for improving the legislation, took actions for thoroughly and systematically informing consumers and businesses and also conducted regular inspections in the market.

In the context of its regulatory role, by making a series of proposals and by submitting an official opinion to the MITN, EETT contributed significantly to upgrading the Ministerial Decision (MD) on redefining the quality specifications of the US and the framework for measuring its quality. In 2010, a series of proposals were submitted to the MITN on the Regulation of Pricing Principles for the US, aiming at the cost-orientation of prices so as to be affordable to consumers. Also, EETT drafted and submitted to the MITN a plan for modifying the relevant MD with a view to improving the prescribed compensations per service. In 2010, the Postal Services underwent a significant change with the new MD, which gave Courier operators who are members of the postal network the ability to acquire a license to use private trucks of less than 4 tons.

In 2010, under the framework of investigating complaints, EETT teams conducted 8 on-site inspections. In six cases, EETT summoned the companies to a Hearing for investigating whether they provide Postal Services without the required General Authorization or Individual License and whether they comply with the provisions of the Regulation on General Authorizations, and in order to impose the relevant sanctions. It must be noted that most complaints were due to problems related to the

market of domestic and international dispatches, which was closed until recently. It is worth recalling that, during the years 2008-2009, EETT implemented an ambitious program of more than 450 inspections conducted on its own initiative but the results showed only a small number of violations. In order to protect consumers and ensure fair competition in the postal market, EETT posted on its website a list of all the Courier Services operators which have been deleted from the Postal Operators' Registry.

With a view to better serving and informing consumers, EETT added in 2010 to its Geographic Information System (GIS), which is available on its website, an application for searching post offices locations. Furthermore, EETT conducted its annual study of postal market analysis with the participation of operators with General Authorization/ Individual License and of the USP and it carried out market research on consumers, businesses and municipalities with regard to the level of satisfaction from the provision of the US.

Domestic and International Collaborations

2010 was a highly constructive year as regards EETT's partnerships and collaborations. At the domestic level, EETT coordinated its actions with other Independent Administrative Authorities and government bodies, such as the Hellenic Competition Commission and the Ministry of Citizen Protection, while it embraced from the beginning the task of the "Digital Greece 2020" Forum, providing active support with financial and human resources and logistics.

EETT maintained an active presence in European affairs throughout the year. In the Electronic Communications sector, EETT actively participated in the proceedings of the Body of European Regulators of Electronic Communications (BEREC), the Independent Regulators Group (IRG), the European Competition Network (ECN) and the Euro-Mediterranean Regulators Group (EMERG). Moreover, it took part in numerous other official Committees, Working Groups of the European Union (EU) and other organizations.

In the Postal Services sector, EETT participated in the establishment of the European Regulators Group for Postal Services (ERGP), which deemed urgent due to the liberalization of the postal markets. Additionally, it boosted its international presence by taking part in the conference and Forum organized by the Universal Postal Union (UPU), the conference of the Comité Européen de Réglementation Postale (CEPR) and other international seminars, conferences and exhibitions.



EETT's successful course was crowned at the end of the year with an important international distinction. The president of EETT, Dr. Leonidas Kanellos, was unanimously elected Vice-Chair of BEREC for the year 2011 by the 27 Regulatory Authorities of the member states comprising the Body and the representatives of the European Commission. This unanimous election in BEREC's Vice-Presidency and Management Committee is a real recognition and a vote of confidence granted to EETT by all the partners and the European Commission, placing the Greek Regulatory Authority at the center of European developments.

Other Actions

Actions to improve EETT's internal organization and operation continued in 2010. The recruitment of staff from the former Olympic Airways allowed the Regulatory Authority to significantly reduce the number of external associates-members of working groups employed for meeting the requirements of its service. At the same time, 14 positions were announced for Heads of EETT's administrative units. It is estimated that the competition will be completed within the first four months of 2011 and the new Heads will assume their duties. In addition, EETT continued to take actions for training its employees,

ensuring their safety and protecting their health.

Regarding the information support of its work, EETT utilized the modern technological means by adopting teleconference applications both at the level of systems and that of services. At the same time, it used its website in order to increase transparency, to publicize its actions and to inform the public. In this direction, EETT posted the items of the agenda of Plenary meetings and its Decisions.

Responding to the need to continuously and systematically inform the public, the Regulatory Authority posted on its website a study on the potential effects of mobile communications systems on health. In this framework, it expanded the Geographic Information System (GIS) incorporated on its website since last year and enriched the available information with data on the Postal Services.

Additionally, in order to improve its effectiveness, EETT gave Electronic Communications and Postal Service operators the ability to electronically submit their applications on its website. In this way, EETT improved the speed of responding to the requests of both of those who are already enlisted in its registries of operators/natural persons and of those who desire to operate in the markets under its responsibility.



1

The Consumer at the Center of Developments



Consumers' rights and better protection of their interests shape all actions and initiatives taken by EETT. Thanks to its recent interventions, consumers enjoy important benefits such as reduced mobile telephony rates, less time required for Number Portability and protection from excessive charges and fraud. At the same time, EETT's regulatory interventions contributed to ensuring a healthy competition environment and achieving a higher level of transparency in the relations between consumers and the Electronic Communications and Postal Services operators.

Furthermore, in order to provide a continuous and systematic flow of information, EETT took a series of actions for informing the public and cultivating public debate on the area under its competence. The Consumer Service Sector (CSS) handles methodically and effectively all the complaints received by EETT and its contribution is of critical importance in the communication between EETT and the consumers.

1.1. Consumer Service Sector

In 2010, EETT's Consumer Service Sector (CSS) continued its effective operation, being the reference point for consumer complaints on the Electronic and Postal Services market, on the one hand, and the launch pad for a series of supervisory and regulatory interventions to the benefit of the market and the consumers, on the other.

In order to measure the quality level of the services provided to the consumers, EETT has set out the following key performance indicators (KPI) for the CSS:

- KPI1: Reflects the share of consumers satisfied with the CSS telephone service. In 2010, KPI1 exceeded 96%.
- KPI2: Refers to the time required for processing written complaints filed with the CSS. In 2010, KPI2 stood at 12 working days.
- KPI3: Refers to the share of CSS-processed complains which were answered in favor of the consumers who had lodged them. In 2010, KPI3 was 48.65%.

During 2010, the CSS recorded and processed 8,348 written complaints, 75.1% of which were related to internet, mobile and fixed telephony services, 17.5% concerned the radiofrequency spectrum, 2.1% concerned the Postal Services and the remaining 5.2% pertained to miscellaneous requests (Table 1.1).

The overall picture for the Electronic Communications market appears in Chart 1.1. According to the chart, recorded requests/complaints followed a downward trend in 2010 with their average number stabilizing in the last 9 months at approximately 550 per month.

In 2010, 52% of complaints about Electronic Communications services were related to Local Loop issues (e.g., faults, connection cancellations, disputed charges, deficient customer service, arbitrary connection activations), while roughly 17% concerned fixed telephony issues (e.g. Carrier Pre-Selection, disputed bills). Chart 1.2. shows complaints about Electronic Communications issues broken down by category and Chart 1.3. shows complaints about Local Loop issues, in particular.

With respect to the radiofrequency spectrum, the Spectrum Directorate received 1,461 written complaints concerning the construction of mobile telephony antennas. In the Postal Services sector, EETT received 180 written requests/complaints, 73% of which related to problems in the provision of the Universal Service (US). In addition, complaints about Courier services concerned mostly delayed delivery of items to their recipients. A detailed breakdown of all written complaints about Postal Services is shown in Chart 1.4.

In addition, during 2010, EETT received 11,048 telephone requests/complaints from consumers, a figure almost 20% lower than the corresponding 2009 figure (13,862 requests/complaints). The majority of these requests/complaints pertained to issues relating to Local Loop Unbundling (LLU), disputed bills, Carrier Pre-selection, damages, the quality and availability of specific services provided by Electronic Communications and Postal Services operators, and mobile telephony antenna licensing. A thematic breakdown of the calls served by the CSS in 2010 is given in Chart 1.5.



Table 1.1.
Classification of Written Requests/Complaints, 2004-2010

Category	2004(%)	2005(%)	2006(%)	2007(%)	2008(%)	2009(%)	2010(%)
Radiofrequency Spectrum (Antennas)	54	36	17	6	6	13	17.5
Electronic Communications Services	36	57	76	90	89	78	75.1
Internet	7	11	21	10	10	3	4.5
Mobile Telephony	10	5	6	3	4	12	17
Fixed Telephony	18	40	48	77	75	63	48
Premium Rate Services	0	0	0	0	0	0	5.6
Postal Services	2	1	1	1	1	2	2.1
General Information	8	6	6	3	4	7	5.2

Source: EETT

Chart 1.1.
Monthly Progress of the Total Number of Written Complaints about Electronic Communications Services, 2009-2010

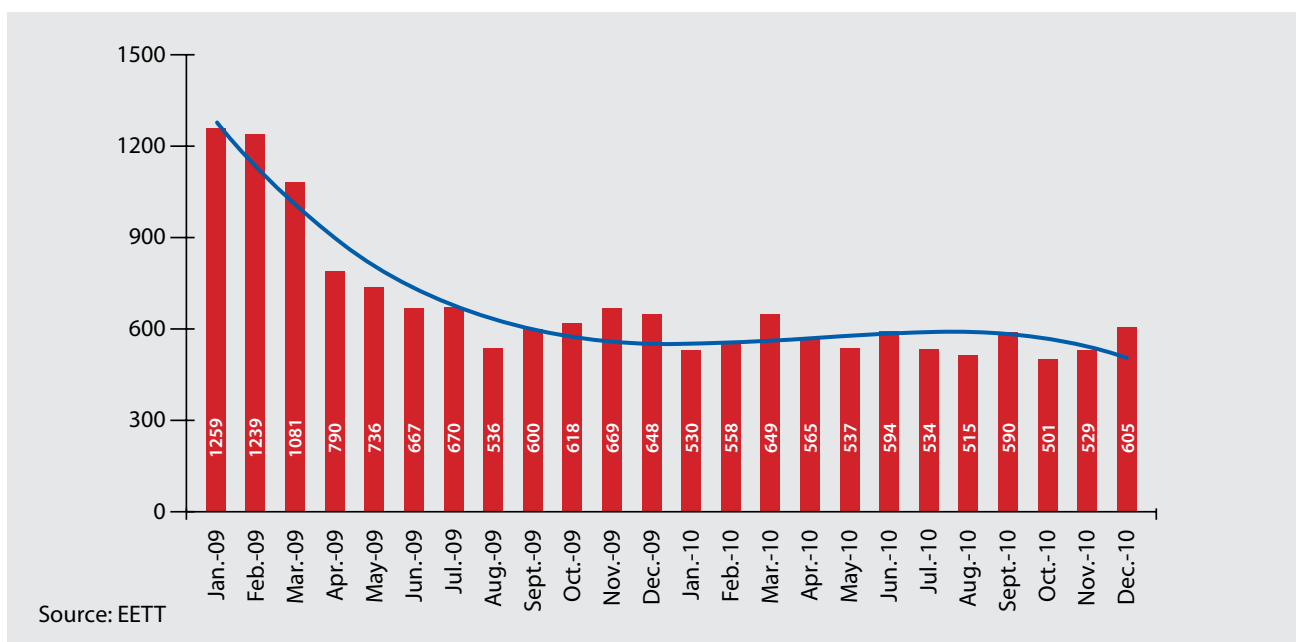


Chart 1.2.
Breakdown of Written Complaints about
Electronic Communications Issues per Category, 2010

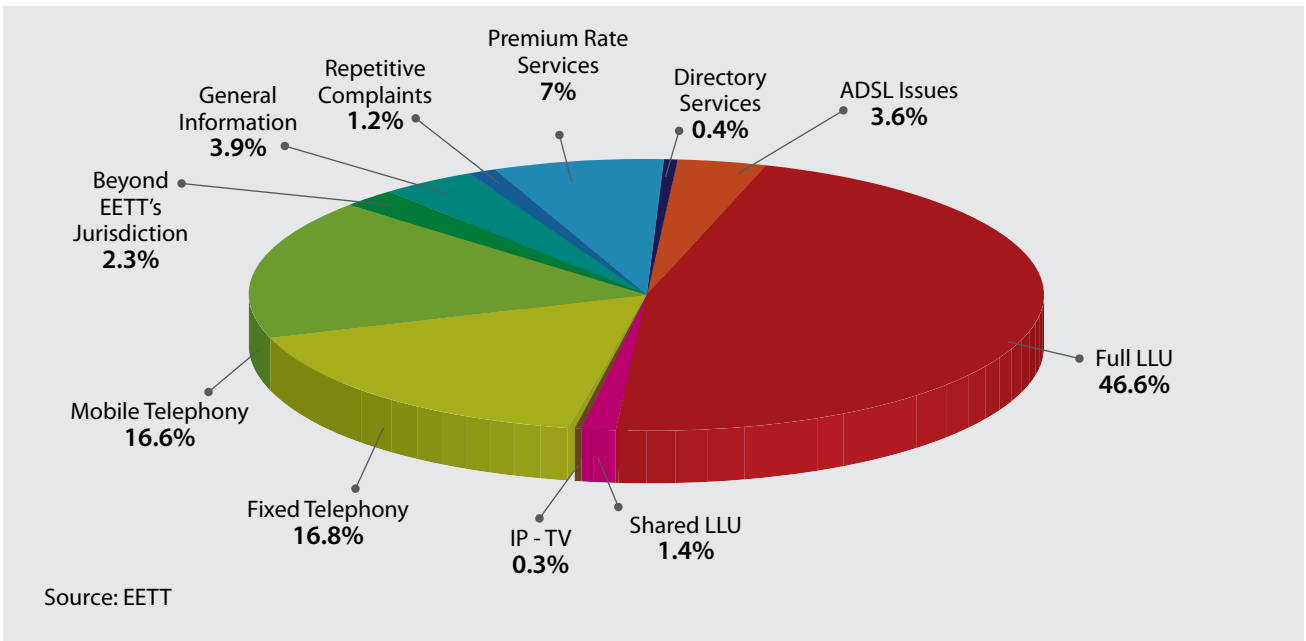


Chart 1.3.
Classification of Complaints about Local Loop, 2010

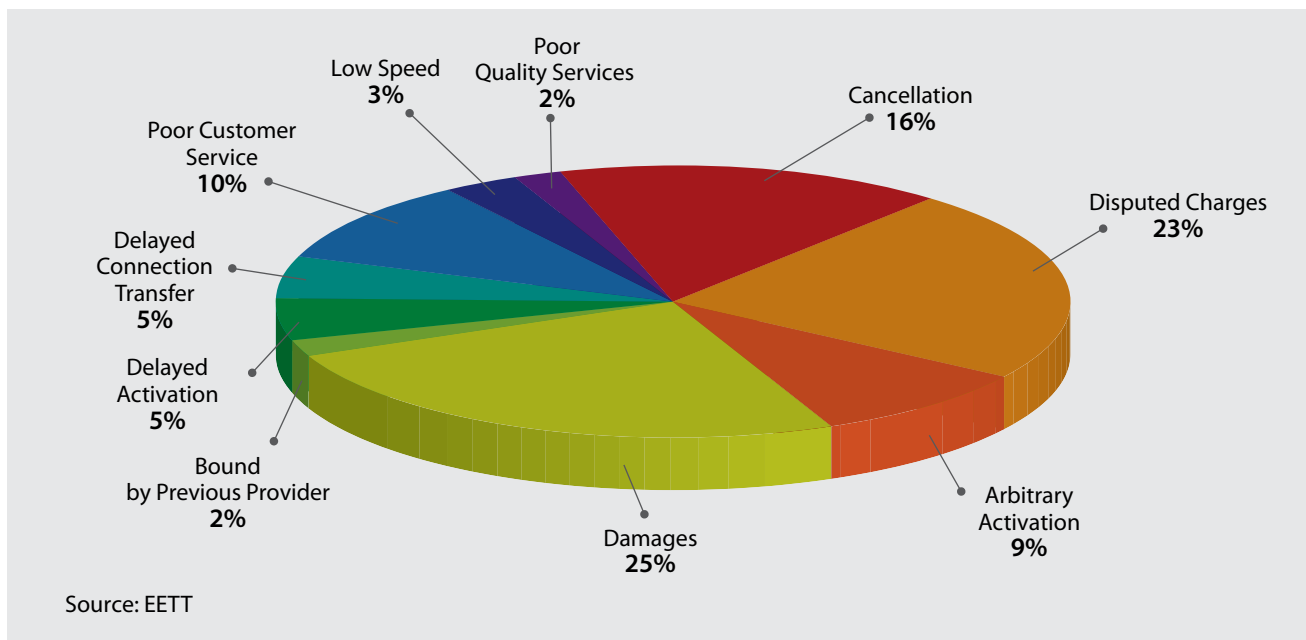


Chart 1.4.
Classification of Written Requests/Complaints
about Postal Services, 2010

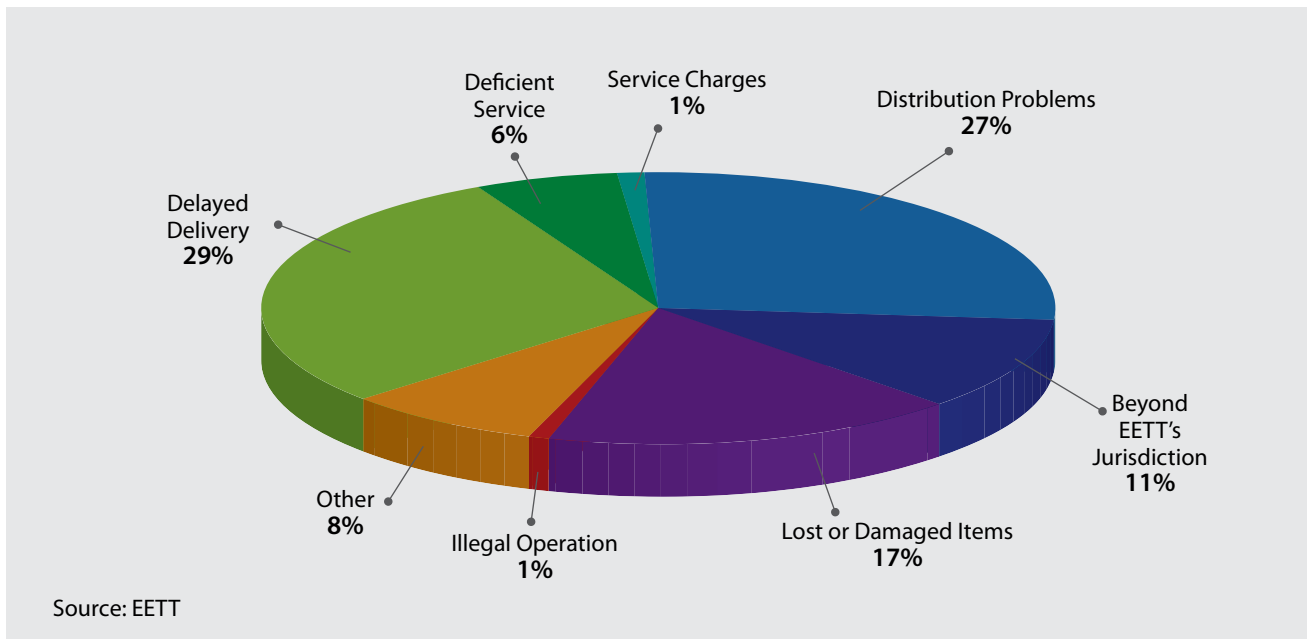
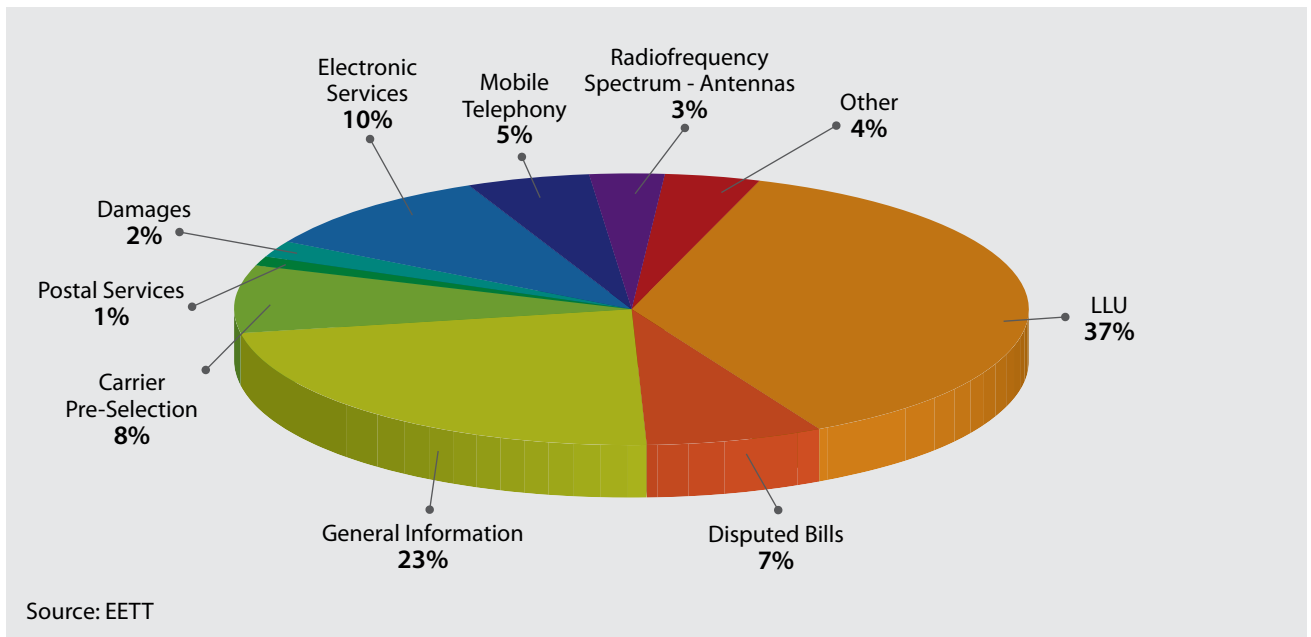


Chart 1.5.
Classification of Consumer's Telephone Requests/Complaints 2010



1.2. EETT's Interventions to Benefit the Consumer

During 2010, EETT took a series of actions and initiatives which aimed at ensuring protection of consumer rights, as well as at providing quality and innovative services. Furthermore, it made important regulatory interventions geared toward shaping a healthy competitive environment and took actions aimed at informing the public and cultivating discussion on the Electronic Communications and Postal Services sectors.

Reduced Mobile Telephony Rates

Continuing their gradual fall, as of January 1, 2010, mobile telephony rates dropped from 0.0786 euro/minute in 2009 to 0.0624 euro/minute, achieving a reduction of over 38% compared to 2008 (0.1003 euro/minute).

New Amendment to the Code of Practice for Premium Rate Services

In October 2010, EETT made a new amendment to the Code of Practice for Premium Rate Services (PRS), incorporating new regulations and obligations with regard to the provision of subscription PRS. EETT's objective was to protect minors, to restrict excessive charges, to inform fully and appropriately the consumers and to increase the transparency of billing.

The most important new obligations imposed on providers include, inter alia, the possibility for the user (a) to block access to all PRS or to some specific numbering series as well as to incoming short PRS messages, and (b) to access a price list for all the provider's PRS services. Also, the Code sets an upper limit on charges, not allowing the monthly cost of a particular subscription PRS to exceed 20 euros. If a consumer subscribes to a new PRS and the total monthly price of his/her subscriptions paid to the PRS provider exceeds 20 euros, then a free of charge informative message will be sent asking for his/her explicit consent.

It must be noted that, in December 2010, EETT imposed fines totalling 2,044,783 euros on the companies BUONGIORNO HELLAS MOBILE LTD, NETSMART CYPRUS LTD and WIN A.E. for infringements of the EETT's Code of Practice with regard to PRS via premium SMS. The fines were imposed in the aftermath of complaints submitted by consumers and the consecutive investigations carried by EETT.

Transparency in the Charges of Public Telephone Services

EETT took a series of specific actions for increasing transparency in the charges for using Public Telephone Services, so that subscribers receive in their bill the basic information that would allow them to verify and control their charges. More particularly, after a Public Consultation, EETT decided to issue a Regulation on fixing the Minimum Level of Itemized Billing (MLIB) for all public telephone services. The providers are now obliged to provide the MLIB free of charge and it must include: (a) aggregated data on services such as calls, short message services (SMS), multimedia messages (MMS), data transfer, as well as a classification based on call categories (e.g., local, national, calls to mobile, multimedia information services) and networks (e.g., calls within the mobile network, calls outside the mobile network), (b) the total actual duration of subscribers' calls and the total invoiced duration and (c) information on any change in the billing method of the subscriber's connection.

Subsequent to the subscribers' request, the providers must provide a free of charge enriched MLIB that includes further details on particular items. More specifically, it contains information pertained to PRS such as the itemized presentation of all charges regardless of their amount, the mandatory reference of the PRS provider's title or, in case the latter is unknown, of the provider to whom the number of the provided PRS was initially assigned and lastly, the itemized presentation of the chargeable incoming PRS text messages.

Reduction of the Time Required for Number Portability

In order to further facilitate the consumers' right to change their fixed or mobile telephony provider and keep their number, EETT amended the Regulation on Number Portability. The most important amendment was the effective reduction of the time required for number portability from ten to three working days after the date of submission of the relevant request by the subscriber to the recipient-provider and to one working day after the date of acceptance of the relevant application.

Additionally, the new Regulation simplifies the procedures in the case of submission of adjoined applications for Number Portability and full LLU, so that number porting can be implemented concurrently with the delivery of the loop.



The above-mentioned reduction of the time required for Number Portability was put into effect after December 1, 2010 for mobile telephony and after May 2, 2011 for fixed telephony, subsequent to a Decision by EETT (598/10/31-03-2011).

Sanctions on Mobile Telephony Operators for Providing Deficient Information to Consumers

After conducting a thorough investigation on all available commercial packages offered by the three mobile telephony operators (COSMOTE, VODAFONE and WIND) to individuals and businesses and after holding a series of Hearings, EETT discovered infringements of the provisions on consumer protection of the telecommunications legislation, the Regulation on General Authorizations and the Code of Practice. According to these provisions, the operators must inform the subscribers in a clear, simple, concise, easily accessible and non-misleading manner if they unilaterally modify the contract's terms. The above-mentioned operators failed to fulfill these particular obligations when they raised the minimum call charge for voice-calls and video-calls from 30 to 45 seconds during September-December 2009. The rise entailed a proportional financial burden for about 4.2 million contract subscribers. Consequently, EETT imposed fines totalling 5 million euros based on the number of the affected subscribers of each operator, the seriousness of the infringement in each particular case and the fact that the subscribers were deprived of the possibility to terminate the contracts.

Protecting the Rights of People with Disabilities

In July 2010, EETT conducted a Public Consultation with a view to submitting a Recommendation to the Minister of Infrastructures, Transport and Networks on modifying the Joint Ministerial Decision (JMD) on "Taking measures for end users with disabilities"¹. EETT's Recommendation specifies, inter alia, the categories of the entitled persons with disabilities and the competent Committees for the certification of disabilities.

Also, EETT imposed a fine of 105,000 euros on OTE for not implementing the special measures addressed to people with disabilities, after conducting a Hearing for investigating the issue. It was a Decision of major social significance since it concerns the protection of a special group of citizens with a degree of disability of at least 67%.

Recommendation to Consumers on Premium Rate Services

Subsequent to the publication of the Code of Practice for the provision of PRS (July 2009) and after receiving repetitive complaints about bills with 5-digit codes of premium charge, EETT addressed a recommendation to consumers, advising them to be more careful when entering their mobile telephone number in webpages and to always read carefully the terms mentioned therein. EETT invited consumers who receive such services and are charged without their will or consent to immediately file a complaint with the competent authorities, and more specifically: with EETT, if the information was insufficient, with the Police, if they think that fraud was involved in the provision of service, with the Hellenic Data Protection Authority, if they receive non-chargeable messages or calls without their consent, and with the Consumer Ombudsman for any disputed charges.

Recommendation to Companies with Digital Call Centers

After a series of intrusions into call center systems and high bills charged to companies, EETT addressed a recommendation to companies with digital call centers. The intrusion into companies' digital call centers (Private Automatic Branch Exchange) by taking advantage of security gaps is the result of malicious interventions by external agents (hackers) aiming at conducting high-cost calls (e.g. to foreign countries with high charges). In certain cases, these calls are conducted when the companies are closed and the unusually high traffic is often directed in a very short time period. The result is that companies are charged with sky-high bills that they have to pay to their telephone provider. Consequently, EETT recommends that companies with digital call centers should (a) ensure that their security mechanisms are upgraded and updated and b) contact their telephone provider, in case of malicious traffic, asking to block outgoing traffic to the destinations at stake.

Draft Ministerial Decision for Compensating Postal Services Users

In order to improve the specified compensations for deficient provision of Postal Services, EETT has drawn up and submitted to the MITN a Draft MD containing the following pillars: firstly, calculating compensations based on the type of postal item (letter or parcel) and the extent

¹JMD 44867/1637, GG Issue 1667/B/18-08-2008.



of the damage (total or partial damage, loss or delay) and secondly, specifying clearly which services and postal operators are related to which type of compensation.

Geographic Information System with Post Offices

EETT added a new application for searching post office locations in the Geographic Information System (GIS) available on its website. This new application offers the possibility to locate the nearest post office in each area, substantially facilitating its identification for any interested user.

1.3. Informative Actions

In 2010, EETT continued its important initiatives for informing the public on issues of Electronic Communications and Postal Services in the context of the project "Strategic Information Planning and implementation of EETT Action Plan", which had already begun since the previous year. More particularly, in 2010 the following actions were carried out:

EETT's 5th International Conference on "Next Generation Access Networks: Unleashing the Potential for the Citizen and the Economy"

In June 2010, EETT organized its 5th International Conference dedicated to Next Generation Access Networks (NGAs). Many Greek and international speakers participated in the Conference, including representatives from Regulatory Authorities, Electronic Communications and television station operators, users and providers of fixed and mobile telephony services.

The objective of the Conference was to highlight the new challenges and possibilities opened by the transition to NGAs at the social, economic and regulatory level. During the two days of the Conference, the agenda included presentations based on experiences of pioneering NGA applications at the international level, discussions on the ways of handling business challenges and on establishing strategies for their development, as well as a review of the regulatory interventions required for encouraging investments and protecting competition.

The Minister of Infrastructures, Transport and Networks, Mr. Dimitris Reppas, gave the inaugural speech, while the Vice President of the European Commission and Commissioner for Digital Agenda, Mrs. Neelie Kroes, addressed a video message to the conference participants.

The first section included the presentation of best practices for efficient use of NGAs and the discussion focused on their beneficial use at the national, regional

and local level. The second section was a roundtable discussion, giving the opportunity to representatives of the providers to exchange useful opinions and experiences from the market. The third section of the Conference focused on the European regulatory policies for developing NGAs, while the fourth section was dedicated to the growth potential of mobile Broadband. The proceedings of the Conference were concluded with a special section dedicated to the digital switchover.

EETT's One-Day Conference on Postal Services

In April 2010, EETT organized an one-day conference on "The Future of the Postal Market: Regulatory Challenges and Development Tools". The presentations and discussions in the conference focused on the appropriate technical, financial and regulatory choices which can be made, so as to constitute tools for the growth of the Greek postal market, to the benefit of the consumers, the businesses and the national economy. The speakers were representatives of the Government, the Regulatory Authorities and the European Union (EU), as well as players in the Greek and European market of Postal Services.

The main sections of the Conference were the following: (a) Liberalization of the Postal Market: European Guidelines and National Practices, (b) Postal Services: Focus on Citizens and (c) New Services-New Partnerships-New Technologies: Opportunities and Strategies for Green Growth.

Publication and Distribution of Information Leaflet on the Universal Postal Service

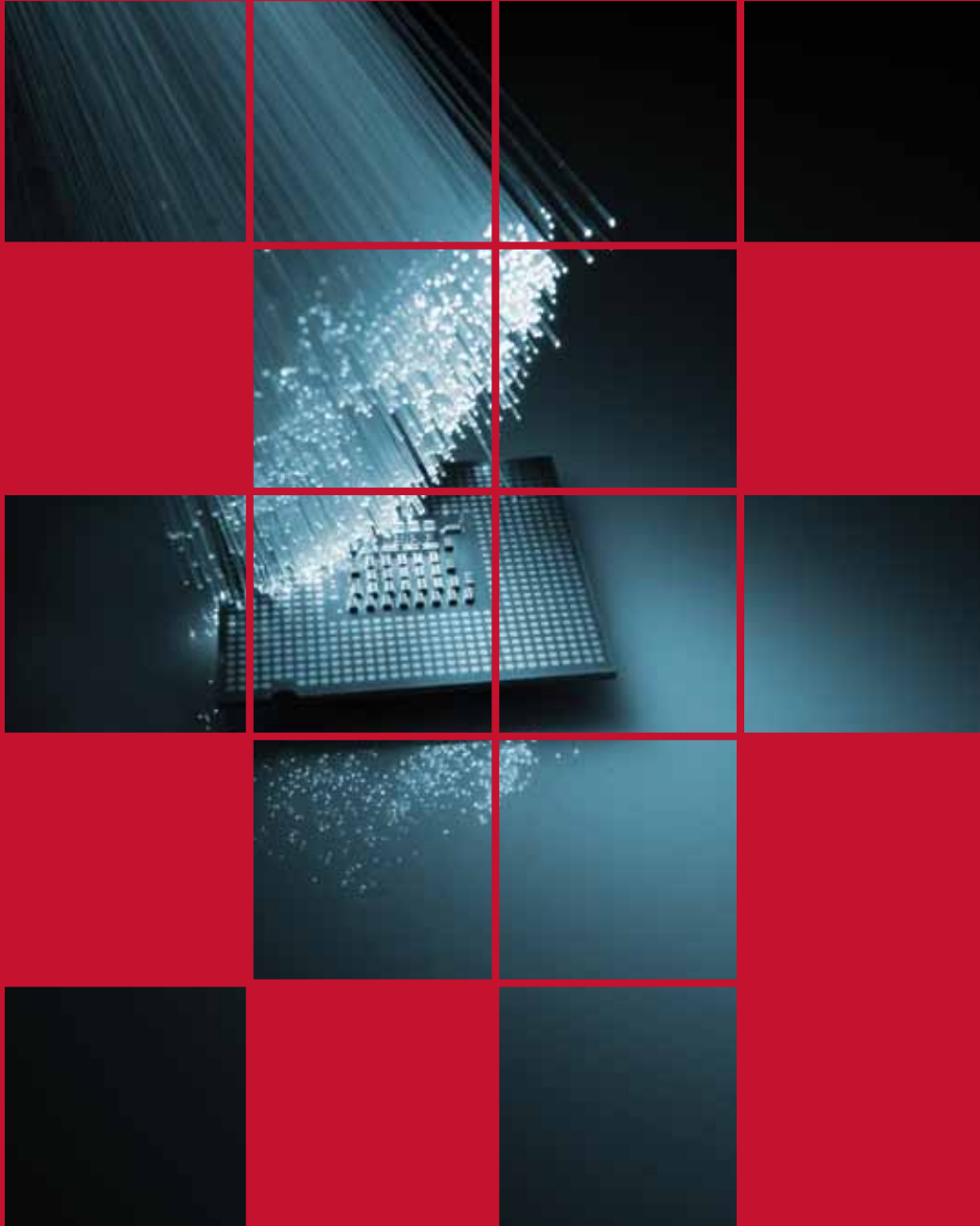
In accordance with its commitment to continuously inform the consumers about their rights, EETT published an information leaflet on the Universal Postal Service. The leaflet outlines in a thorough yet clear and concise way the obligations of the Universal Postal Service Provider with respect to (a) collection and distribution, (b) the immediate delivery of first priority mail, (c) the access points for letters and parcels, (d) the delivery of parcels, (e) effective service, (f) compensation, (g) the establishment of a Dispute Resolution Committee and (h) confidentiality of mail. Finally, it advises consumers on how they can contribute to improving the Universal Service (e.g., guidelines on how to properly write one's mailing address on an envelope and how to properly pack a parcel, how to ensure the proper maintenance of mailboxes etc.).

In December 2010, the leaflet was inserted into three Sunday newspapers and, in the beginning of 2011, it is scheduled to be widely distributed on the streets of Attica, Thessaloniki and other cities in Greece.



2

Electronic Communications Sector



In accordance with its regulatory role, EETT conducted in 2010 an analysis of Wholesale Interconnection markets and Retail Calls markets in the context of the second round of market analysis. In addition, EETT took a series of regulatory actions including, inter alia, the approval of OTE's Reference Offers for Wholesale Broadband Access (WBA) and the provision of Wholesale Leased Lines, the publication or amendment of the Regulations on Premium Rate Service (PRS), the Management and Assignment of Numbering Resources of the National Numbering Plan (NNP) and the determination of the Minimum Level of Itemized Billing (MLIB) for Public Telephone Services.

Moreover, in the framework of promoting Broadband, EETT took a series of actions for the effective growth of Next Generation Access Networks (NGAs) and the completion of spectrum use liberalization of the 900 MHz band in order new wireless technologies and mobile telephony network services to be developed. Lastly, EETT published Regulations on Access Network Frequency Plan as well as on access to Application Program Interfaces (API) and to Electronic Program Guides (EPG).

The following sections analyze EETT's overall actions in the Electronic Communications sector in the course of 2010.

2.1. Market Analysis based on the European Regulatory Framework

According to the Regulatory Framework governing the provision of Electronic Communications and Network services, EETT is responsible for carrying out a definition and analysis of the relevant markets in Greece, as well as for imposing any necessary regulatory obligations (as required per case) when it ascertains that a certain market is not adequately competitive. In the context of the second round of market analysis, EETT analyzed in 2010 both the Wholesale Interconnection markets and the Retail Calls markets, taking especially into consideration the New Recommendation on the relevant product markets² as well as the Guidelines on Market Analysis and Assessment of Significant Market Power³ of the European Commission.

Wholesale Broadband Markets

EETT examined Wholesale Interconnection markets, taking into account the national conditions shaped by

the first round of analysis. The proposed Draft Measures were placed under a national Public Consultation⁴, and the European Commission and the NRAs were notified in the period April 14, 2010 - May 14, 2010. Taking into consideration the comments submitted by both the participants in the Consultation process⁵ and the European Commission⁶, EETT issued the relevant Decision⁷ outlining the following markets within the Greek market:

- The Wholesale Call Origination Market in the public telephone network provided at a fixed location.
- The distinct wholesale markets for call termination to end users in individual public telephone networks provided at a fixed location:
 - A wholesale market for call termination to end users in OTE's network and
 - Distinct wholesale markets for call termination to end users in the network of each of the companies mentioned in Appendix I of the Decision⁸.
- The Wholesale Transit Services Market in the fixed public telephone network.

²Commission 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, [EU L 344/65, (2008/879/EC), 28-12-2007].

³Commission Guidelines on market analysis and the assessment of significant market power under the community regulatory framework for Electronic Communications networks and service (2002/C 165/03).

⁴EETT Decision 560/045/08-04-2010.

⁵EETT Decision 573/013/22-07-2010.

⁶European Commission letter no C(2010)3255/17-05-2010 (SG-Greffe (2010) D/7030).

⁷EETT Decision 573/017/22-07-2010 (GG Issue 1353/B/01-09-2010).

⁸The operators with SMP in the market of call termination in their own network are the following: ALGONET, COSMOLINE, COSMOTE, CYTA HELLAS, FORTHNET, HELLAS ON LINE, NETONE, ON TELECOMS, VIVODI, VOICENET, VODAFONE and WIND.



After assessing the level of competition in the above-mentioned markets, EETT concluded that OTE maintains Significant Market Power (SMP) in the origination and transit markets and that OTE and the other telecommunications operators have SMP in the termination market of their networks.

In order to deal with current and potential competition issues, EETT maintained most of the regulatory obligations imposed on OTE in the context of the first round of market analysis. More particularly, the obligations imposed were the following:

- Granting access to and use of the network's special facilities for the markets of call origination, termination and transit. This obligation includes, inter alia, the provision of Carrier Selection and Pre-Selection services, the provision of collocation services and the signing of service level agreements.
- Non-discriminating treatment.
- Transparency, including the obligation of publishing a relevant Interconnection Reference Offer.
- Accounting separation.
- Price control and cost-orientation. This obligation prescribes cost-oriented prices for Interconnection Services and related facilities based on the methodology of the Long-Run Average Incremental Cost (LRAIC), by using the current cost of fixed assets as a cost determination basis.

At the same time, EETT imposed the following regulatory obligations on SMP providers in the individually defined markets of wholesale termination services for calls to end users per network:

- Wholesale provision of call termination.
- Non-discriminating treatment.
- Transparency.
- Price control and submission of cost data, based on which a termination price cap will be imposed on calls to end users (price ceiling), which in every year will be equal to OTE's average single termination fee, as determined by the Decision on OTE's cost accounting audit of the preceding year.
- Subsequent to a request made by EETT, all the relevant data must be submitted for developing a new bottom-up model for fixed telephony termination fees according to the European Commission's Recommendation on the

Regulation of Fixed and Mobile Telephony Termination Fees in the European Union (EU).

Retail Markets for Calls provided at a Fixed Location

In the context of the second round of analysis of the Electronic Communications market, EETT placed the Draft Measures on the Retail Call markets under a national Public Consultation and also notified⁹ the European Commission and the Regulatory Authorities of the other member states in the period November 26, 2010 - January 10, 2011. According to the Draft Measures, there are two relevant call markets in Greece:

- The local and national calls market provided to residential and non-residential clients at a fixed location in Greece (calls to geographic numbers in Greece) and
- The market of calls to non-geographic numbers provided to residential and non-residential clients at a fixed location in Greece (calls from fixed to mobile and calls to service providers via non-geographic numbers).

Applying the three-criteria test¹⁰, EETT found out that both markets need ex ante regulation. Subsequently, after examining OTE's relative power based on its market share both in relation to other operators and in view of the progress of the market, the possibility of potential competition and the lack of offsetting purchasing power of the retail clients, EETT concluded that the markets in question are still characterized by lack of effective competition and that OTE maintains SMP in the defined relevant markets. In order to deal with current and potential competition problems, EETT proposes in the Draft Measures that OTE must remain subjected, inter alia, to the following regulatory obligations:

- Control of retail prices, which includes, inter alia, the imposition of a cap on retail prices¹¹/retention fees¹² for certain types of calls (local, national, calls to mobile, dial-up calls on the Internet).
- Accounting separation for all calls.
- Non-discriminating treatment for all types of retail calls.
- Compliance with the general provisions on transparency and the publication of information.
- Prohibition of unjustified bundling. In addition, OTE must notify EETT about its proposals with regard to bundling as well as about any modification on the terms of a package/offer. After conducting an audit, EETT can

⁹EETT Decision 585/013/25-11-2010.

¹⁰According to the European framework and specifically the new Recommendation on the relevant markets, it is recommended to apply the following accumulative criteria for determining the markets amenable to ex ante regulation: (1) The presence of high and non-temporary entry barriers in the market in question, (2) The structure of the market in question does not tend toward effective competition in the relevant time horizon of market analysis and (3) The implementation of the rules of competition is not sufficient in itself for dealing with the failures of the market under consideration.

¹¹In cases of on-net calls.

¹²In cases of off-net calls



approve under certain conditions/amendments or reject the proposal submitted by OTE.

In the first semester of 2011, when the second round of analysis will be concluded, EETT will undertake the examination of the retail markets for access to the public telephone network and of the retail and wholesale markets for leased lines.

2.2. Promoting and Ensuring Fair Competition in Networks and Services

2.2.1. Interconnection

Fixed Telephony

In order to ensure fair competition in networks and services, EETT examined a series of requests for dispute resolution submitted according to the prescribed procedure concerning¹³ the following issues:

- The amount of the retention fee for call collection of the number series 806, 812, 825, 14, 118 from mobile telephony operators.
- Wholesale billing for call collection of the number series 800, 807 from mobile telephony operators.
- Portability issues for numbers 800, 801 in mobile telephony networks.
- A two-step dialing service (namely considering the possibility of providing a two-step dialing service in mobile telephony networks via specific number series).
- Routing mobile telephony numbers that have not been assigned to mobile telephony network providers.

In June 2010, the Dispute Resolution Committee met in order to examine the above-mentioned issues and the final conclusion is expected to be published within the first quarter of 2011.

Mobile Telephony

Pursuant to its actions during the two preceding years (imposing¹⁴ the transparency obligation and, by extension, the obligation of publishing an Interconnection Reference Offer on the mobile telephony operators COSMOTE, VODAFONE and WIND, conducting a Public Consultation and processing its results), EETT drew up a final proposal containing the amendments on the Interconnection Reference Offers that the above-mentioned operators were asked to submit. The operators submitted the amended Reference Offers and EETT made some justified final amendments and approved them in accordance

with the provisions on the termination calls market in mobile networks.

2.2.2. Local Loop Unbundling

In 2010, EETT took the following actions for further developing LLU:

- Amended OTE's Reference Offer for LLU and Related Facilities, improving the procedures for providing access to the local loop and sub-loop.
- Conducted 3 Hearings in which both OTE and the operators FORTHNET, ON TELECOMS and WIND were summoned in order to examine OTE's method and procedure for charging alternative providers with regard to visits by OTE crews for repairing damages (charges for unnecessary visits).
- Conducted 4 Hearings in which the operators FORTHNET, HELLAS ON LINE, ON TELECOMS and WIND were summoned with regard to consumer complaints on arbitrary activations in the networks of these operators.
- Issued a Decision¹⁵ resolving the problem concerning the procedure for calculating the charges on telecommunications providers for consuming electrical power in the Physical Collocation areas.

The positive contribution of EETT's actions to the further development of LLU is reflected in the following trends:

- The number of OTE's Local Exchanges (L/E) with existing and operational Physical Collocations for the entitled providers rose to 173 in December 2010 from 168 in December 2009, while the number of OTE's L/Es providing Remote Collocation rose to 773 from 704.
- The number of local loops operating in the entitled providers' networks rose from 867,000 in December 2009 to 1,387,000 in December 2010 (roughly 26.5% of the fixed telephone lines in the country).
- The pairs available for activation delivered by OTE to the entitled providers reached the number of 2,310,000 in December 2010 compared to 1,867,000 in December 2009.

In 2011, EETT will examine a series of critical issues for LLU concerning:

- The implementation of the provisions relevant to the installation of cabinets in the yard area of OTE's L/Es.
- The use of the sub-loop by the entitled providers for developing NGAs.
- The coordination of procedures for access to the infrastructures of access networks.

¹³EETT Decision 506/37/13-01-2009 "Regulation on determining the terms and conditions for the provision of Access and Interconnection according to articles 41 par. 3 and 42 par. 3 of Law 3431/2006" (GG Issue 369/B/03-03-2009).

¹⁴EETT Decision 498/046/22-10-2008, GG Issue 2260/B/05-11-2008.

¹⁵EETT Decision 588/022/16-12-2010, GG Issue 2183/B/31-12-2010.



- The application of the Collocation Regulation in combination with the implementation of Rights of Way throughout the country.

2.2.3. Reference Offer for Wholesale Broadband Access

In July 2010, EETT issued a Decision¹⁶ approving the Reference Offer for Wholesale Broadband Access (WBA). The publication of the Reference Offer on the provision of WBA was one of the regulatory obligations imposed¹⁷ on OTE by EETT subsequent to the procedure for WBA Market definition and analysis and in combination with the selection of the appropriate regulatory measures in accordance with the European framework for Electronic Communications. It must be noted that, in the context of the WBA Market analysis, repeated Consultations were held with all market players, taking into consideration a series of complaints submitted by individual end users.

EETT's Decision made important amendments to OTE's Reference Offer, so that the document meets the current needs of the telecommunications market to the benefit of the consumer and the end user. Analytically, specific procedures and deadlines were set out according to which OTE must provide WBA services to third party providers, ensuring that they can offer to end users services equivalent to those provided by OTE's retail department. At the same time, the establishment of mechanisms and quality indicators is of critical importance in order to ensure the non-discriminating treatment and the transparency of procedures as well as the terms/conditions for the provision of services.

These developments in the WBA market are expected to increase investments from market operators, intensifying competition, furthering the penetration of Broadband in our country and thus benefiting more the end user.

2.2.4. The Model of Economic Space between Local Loop Unbundling and Wholesale Broadband Access

The model for monitoring the economic space between LLU and WBA is a specification of the measure of controlling prices and cost accounting. The relevant EETT Decision¹⁸ describes OTE's obligations pertaining to cost-oriented pricing for WBA services and related facilities as

well as the monitoring of the economic space between LLU and WBA.

More specifically, with regard to the economic space, the Decision mentions that the prices for WBA offers must be set at such level so as to avoid the so-called "scissors effect" and/or price squeeze in the LLU market. To this end, the prices must be set at the right level so as to create a satisfactory economic space between LLU and WBA sufficient enough for the development of competition and for the continuous geographic expansion of LLU. The prices of the WBA service should correspond to the costs of a new entrant in the market whose strategy of expanding infrastructure is based on LLU. These costs can be evaluated based on a standard feasibility model and the methodology for its application will be determined through a process of Public Consultation. Consequently, EETT developed a model (as an internal tool) for monitoring the economic space between WBA and LLU. This model is composed of three sub-models: costs of LLU access, costs of the transmission network and of the WBA (ARYS) access, as well as the part which calculates the final result of the economic space. This model of economic space includes a set of parameters that correspond to an efficient operator.

Through respective Decision, EETT¹⁹ finalized and approved the methodological principles and parameters of the model of economic space between LLU and WBA, as those were shaped after the inclusion of the comments submitted in the Consultations conducted²⁰ both at the national and regional level. Moreover, this Decision determined the process for implementing the measure, according to which the monitoring of the economic space will be conducted at least once a year in the framework of the annual cost accounting audit of OTE. If the result of the audit indicates that the economic space under way is too broad, then EETT will not implement a reduction of WBA (ARYS) prices below the level of cost-oriented prices but it may monitor ex post the compliance with the legislation on free competition.

2.2.5. Ensuring the Provision of the Universal Service

Designation of the Universal Service Provider

After completing the secondary institutional framework governing the provision of the Universal Service (US) by

¹⁶EETT Decision 573/012/22-07-2010, GG Issue 1364/B/02-09-2010.

¹⁷EETT Decision 531/066/23-07-2009, "Definition of the National Wholesale Broadband Access Market, Determination of the Operators with Significant Market Power in that Market and their Obligations (2nd Round of Analysis)", GG Issue 1549/B/28-07-2009.

¹⁸EETT Decision 531/066/23-07-2009 "Definition of the National Wholesale Broadband Access Market, Determination of the Operators with Significant Market Power in that Market and their Obligations (2nd Round of Analysis)", GG Issue 1549/B/28-07-2009.

¹⁹EETT Decision 588/20/16-12-2010, GG Issue 2138/B/31-12-2010.

²⁰EETT Decisions 565/055/20-05-2010 and 575/19/02-09-2010.



the competent Ministries and pursuant to the actions taken in the preceding years (specifying the reliability criteria for the selection of US Provider/s, issuing a call for expression of interest addressed to operators providing Electronic Communications networks and/or services to the public for the provision of the US in whole or in part, placing under consultation the tender documents referring to the selection of US provider), EETT approved²¹ the invitation to tender for the provision of information services relating to a comprehensive telephone and subscriber directory in printed or, alternatively, in electronic format for Greece. The tender procedure concerned only the aforementioned element from the total range of US services, given that interest was expressed only for that element in the context of the relevant invitation²². Although in the initial phase one company announced its interest to participate, it withdrew its interest and EETT suspended the tender procedure. Consequently, in accordance with the provisions in the relevant Ministerial Decision (MD)²³, EETT issued a Decision²⁴ designating OTE as the Universal Service Provider (USP) for the entire Greek Territory and for all elements of the US.

Recommendation on People with Disabilities

Based on the provisions of the relevant JMD²⁵, OTE, as the USP for the entire country and for all elements of the US, must provide additional services/facilities and/or discounts in specific services to particular groups of end users with a certified level of disability. EETT has received a significant number of complaints from entitled users regarding OTE's non-implementation of the special measures specified for people with disabilities. In the context of investigating this specific issue, EETT summoned OTE to a Hearing and decided²⁶ to impose an administrative fine of 105,000 euros for violating the provisions of the aforementioned JMD.

Additionally, in line with the above-mentioned actions, EETT placed under Public Consultation a draft recommendation to the Ministry of Infrastructures, Transport and Networks (MITN) on the amendment of the aforementioned JMD, in order to deal with the ensuing problems decisively. The objective of the new recommendation is, inter alia, to determine the categories of entitled persons with disability as well as the competent Committees for the certification of disabilities.

²¹EETT Decision 562/30/22-04-2010.

²²According to the provisions of paragraph 3 of article 5 of MD 28120/974/11-05-2007 "Requirements, selection criteria and procedures for determining the universal service provider", GG Issue 824/B/25-05-2007).

²³According to paragraph 2 of article 5 of the relevant MD, "The determined operator is the operator defined by EETT as holding Significant Power in the market of access to the public telephone network at a fixed location for residential users".

²⁴EETT Decision 579/09/12-10-2010, GG Issue 1770/B/11-11-2010.

Cost Accounting Principles

In the context of the Regulation setting out the cost accounting principles of the US according to article 55 of Law 3431/2006, the following issued are analyzed:

- The net cost of the US.
- The general cost accounting principles.
- The methodology for calculating the net cost of the US.
- Special issues such as:
 - The definition of the presentation method to EETT of the calculation of the net cost of connection to the fixed public telephone network at a fixed location and the provision of payphones (the process of determining the non-economic geographic areas, clients and payphones, the immaterial benefits obtained by the company, the assessment of lost profits from the sale of terminal equipment).
 - The use of a client-centered billing system.
 - The development of information systems by the US provider allowing it to measure the quality and quantity of services provided as well as the benefits obtained.

2.2.6. Inspection of Electronic Communication Providers

In accordance with its regulatory duties²⁷, EETT conducted in 2010 audits/inspections either ex officio or pursuant to complaints:

- In the L/E areas of Ampelokipi, Zografou, Terpsithea, Glyfada, Ilioupoli and Pallini, in order to inspect the progress of OTE's NGA pilot network (VDSL).
- In companies providing PRS in order to examine potential infringements of the telecommunications legislation. More specifically, EETT conducted technical inspections of the services provided by the operators involved in relevant complaints according to the amendment²⁸ of the Code of Practice for the provision of PRS, which includes special provisions for issues referring to subscriber-only PRS. Subsequent to those technical inspections and the processing of complaints, the operators were summoned to Hearings and fines were imposed in cases of infringement of the legislation.
- In mobile telephony operators, with regard to their compliance with the identification process for the

²⁵Joint Ministerial Decision 44867/1637 on "Taking measures for end users who are Persons with Disabilities", GG Issue 1667/B/18-08-2008.

²⁶EETT Decision 563/049/27-04-2010.

²⁷According to Article 14 of Law 3431/2006, the staff of EETT has the powers and rights granted by Law 703/1977 to the staff of the Hellenic Competition Commission for identifying the violations of the legislation and of the rules of competition in the electronic communications sector.

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



owners and users of mobile telephony equipment and services.

- In pre-paid service providers for ascertaining whether they comply with the telecommunications legislation.

In any case, it is worth recalling that all data collected are processed by the competent departments of EETT. In cases of infringements, the companies involved are summoned before the EETT Plenary in order to face the relevant administrative sanctions.

2.2.7. Examination of OTE's Bundled Services/ Packages – Model of Analysis

OTE's economy programs (individual or bundled) are examined by EETT in order to avoid any cases of predatory pricing and/or margin squeeze. During 2010, OTE submitted 62 packages, of which 55 were approved, 5 were rejected and 2 are still being processed by EETT. More particularly, EETT examined and approved the following economy programs:

- Extension of the offer of "OTelite 180" and "OTelite 300"²⁹.
- "Business Call Corporate"³⁰.
- "OTE Business Pre-paid Local-National Programs 4.500/15.000"³¹.
- "Conn-x Internet & Talk mixed 200 (or Conn-x 2mbps +180+20F2M)"³².
- "Fixed + Mobile 300 (or OTE 250+50F2M)"³³.
- "OTE TALK 24/7 +60F2M (ALL DAY +60 MOBILE)"³⁴.
- "DP2 + 30F2M (INTERNET & TALK-DP2)"³⁵.
- "DP24 + 60F2M (INTERNET & TALK-DP24)"³⁶.
- "Conn-x for Employees"³⁷ program category (of which 6 were approved and 2 rejected)
- "Fixed + Mobile 165 (or OTE 150+15F2M)"³⁸.

Also, EETT ascertained margin squeeze and did not allow the commercial launch of the following economy programs:

- "Fixed + Mobile 200 (or OTE 180+20F2M)"³⁹.

- A program regarding the free offer of 60 minutes of Local and National Calls per month with every new PTNS connection⁴⁰.

- "Conn-x internet & Talk mixed 300 (or Conn-x 24mpbs +250+50F2M)"⁴¹.

- "Fixed + Mobile 180 (or OTE160+20F2M)"⁴².

Furthermore, EETT examined 33 economy programs of the Conn-x and Conn-x@Work category because of an upgrade of ADSL speeds. This particular action aimed at examining whether OTE's offer of higher ADSL speeds at the same retail cost creates any problem for the development of healthy competition. More specifically, EETT examined the following economy programs:

- "Conn-x Talk 24/7", "Conn-x Talk Night", "Conn-x Talk Weekend" and "Conn-x Talk Night and Weekend"⁴³.

- "Conn-x Talk 24/7 with 60 F2M and/or unlimited international calls"⁴⁴.

- "OTE Business Time Packages DP for small and big businesses" Pre-paid telephony programs⁴⁵.

- "OTE Business Plus" Programs⁴⁶.

- «Conn-x mixed 300»⁴⁷.

- "Double-Play and/or unlimited international calls DP24" offered as "Conn-x Internet & Talk"⁴⁸.

Finally, EETT conducted a Consultation with Electronic Communications providers with regard to the methodology and the general principles of the model for examining the economy programs of the SMP provider, who is subject to the relevant regulatory obligation. The general principles of the methodology ensure:

- Consistency with EETT's regulatory policy.
- Strengthening competition in the Electronic Communications market.
- Obtaining the maximum benefit for end users in terms of price, choice and quality.

The methodology in question and the Preliminary Test Model (PTM)⁴⁹ are used for evaluating the economy programs of the SMP provider and will be made available to all interested parties for reasons of transparency. They

²⁹EETT Decision 556/032/10-03-2010, GG Issue 043/B/30-03-2010.

³⁰EETT Decision 570/102/08-07-2010, GG Issue 1123/B/28-07-2010.

³¹EETT Decision 571/011/08-07-2010, GG Issue 1348/B/01-09-2010.

³²EETT Decision 573/019/22-07-2010, GG Issue 1349/B/01-09-2010.

³³EETT Decision 574/004/06-08-2010, GG Issue 1378/B/02-09-2010.

³⁴EETT Decision 574/001/06-08-2010, GG Issue 1380/B/02-09-2010.

³⁵EETT Decision 574/003/06-08-2010, GG Issue 1377/B/02-09-2010.

³⁶EETT Decision 574/002/06-08-2010, GG Issue 1379/B/02-09-2010.

³⁷EETT Decision 585/012/25-11-2010, GG Issue 2034/B/28-12-2010.

³⁸EETT Decision 587/025/23-12-2010, GG Issue 50/B/24-01-2011.

³⁹EETT Decision 573/020/22-07-2010, GG Issue 1373/B/02-09-2010.

⁴⁰EETT Decision 557/010/15-03-2010, GG Issue 1373/B/02-09-2010.

⁴¹EETT Decision 574/005/06-08-2010, GG Issue 1376/B/02-09-2010.

⁴²EETT Decision 587/025/09-12-2010, GG Issue 50/B/24-01-2011.

⁴³EETT Decision 577/009/16-09-2010, GG Issue 1640/B/14-10-2010.

⁴⁴EETT Decision 577/010/16-09-2010, GG Issue 1636/B/14-10-2010.

⁴⁵EETT Decision 577/011/16-09-2010, GG Issue 1636/B/14-10-2010.

⁴⁶EETT Decision 577/012/16-09-2010, GG Issue 1637/B/14-10-2010.

⁴⁷EETT Decision 577/007/16-09-2010, GG Issue 1365/B/14-10-2010.

⁴⁸EETT Decision 577/008/16-09-2010, GG Issue 1639/B/14-10-2010.

⁴⁹The preliminary model reproduces in condensed form the last phases of the main model and aims at giving a first estimate of the results of margin squeeze for an OTE economy program before its official submission to EETT. It must be noted that these results are not binding since EETT maintains the right of monitoring prices with the main model.



are expected to be adopted in the beginning of 2011, taking into consideration the comments and remarks of the European Commission.

2.2.8. Readjustment of Regulated Prices

Fixed Telephony Termination Rates

In the context of the second round of market analysis of the Wholesale markets for call termination to end users provided at a fixed location per network, EETT imposed on SMP providers, inter alia, the obligation of price control. The content of this obligation was different for OTE and for the other operators. More specifically, OTE was subjected to the obligation to provide cost-oriented prices for call termination services to end users in its own network according to the methodology of the Long-Run Average Incremental Cost based on the Current Cost of fixed assets (LRAIC/CC). These cost-oriented prices will be determined based on the “top-down” model developed by OTE having incorporated the relevant EETT Decisions. The results ensuing from OTE’s cost accounting system will be monitored on an annual basis by independent chartered accountants appointed by EETT. The rest of the operators designated as SMP⁵⁰ operators were subjected to a price cap on termination calls to end users (price ceiling), which in every year will be equal to OTE’s average single termination rate, as determined by the Decision of the cost accounting audit of OTE of the preceding year.

In addition, EETT intends to develop a bottom-up model for calculating the fixed telephony termination rates based on the Recommendation⁵¹ of the European Commission for the regulation of fixed and mobile telephony termination rates in the EU.

Mobile Telephony Termination Rates

The second stage of price reduction for termination rates in mobile networks, imposed by EETT for the relevant market, has been implemented. More specifically, since January 1st, 2010, the termination rates fell to 0.0624 euro per minute from 0.0786 euro per minute in 2009. Lastly, the third stage of the relevant reduction (to 0.0495 euro per minute) is expected to be implemented in the beginning of 2011, significantly reducing (more than 50%) the termination rate in three years.

Retention Fees – Price Cap

In the context of EETT’s competence allowing it to audit OTE’s pricelists in the markets in which it holds SMP and verify whether OTE abides by its relevant obligations, EETT set⁵² new price caps and sub-caps for the regulated retail access and telephony services. The new price caps refer, inter alia, to the following services:

Local calls within the OTE network	2.98 eurocents/minute
National calls within the OTE network	5.66 eurocents/minute
Dial-up calls by OTE subscribers to the Internet (including the Greek Single Access Number) when the ISP is hosted by and/or is interconnected to the OTE network	1.54 eurocents/minute

Note: the above prices (i) reflect the effective price because OTE’s pricing policy involves different rate zones, and (ii) do not include VAT.

2.2.9. Competition Issues

Notifications of Acquisitions and Company Establishments

EETT issued a Decision⁵³ approving the separation of Vodafone’s Fixed Electronic communication’s network, provision of fixed telephony and broadband services (DSL) branch and its addition to “HELLAS ONLINE ELECTRONIC COMMUNICATIONS S.A.”.

Also, subsequent to complaints about the infringement of Law 703/1977 by MULTICHOICE HELLAS (NOVA) due to its tactics over issues of digital equipment for the provision of broadcasting services, EETT summoned the involved parties to a relevant Hearing. In December 2010, EETT issued a Decision stipulating⁵⁴ that the company did not ultimately violate the provisions of Law 703/1977 and particularly article 2, on the strict condition that it will accumulatively abide by the specified requirements concerning the manufacturers of decoders, the protection of competition in the digital equipment market and the protection of consumers and the current subscribers

⁵⁰ALGONET, COSMOLINE, COSMOTE, CYTA (HELLAS), FORTHNET, HELLAS ON LINE, NET ONE, ON TELECOMS, VIVODI, VOICENET, VODAFONE, WIND.

⁵¹<http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:124:0067:0074:EL:PDF>.

⁵²EETT Decision 562/029/22-04-2010, GG Issue 668/B/18-05-2010.

⁵³EETT Decision 553/013/2010.

⁵⁴EETT Decision 588/59/16-12-2010.



of the company in particular. EETT retains the right to examine the consistent compliance of MULTICHOICE with the above-mentioned requirements in the future.

By virtue of a Decision, EETT ruled that its prior approval was not required for the notified acquisition of the total shared capital of "WIND HELLAS TELECOMMUNICATIONS S.A." by the company with the trade name "Crystal Almond S.à.r.l." according to the provisions of article 26 of Law 3431/2006, given that the acquisition of the total shared capital of WIND by the purchasing company will not result in the acquisition of "control" under the European and Greek competition law.

Leniency Program

In line with its competences as a Competition Commission, EETT published in 2010 the "Leniency Program" setting out the terms and conditions for immunity or reduction of fines imposed on companies which contribute to the investigation of infringements of the provisions of Law 703/1977. The Program aims at identifying and dealing with cases of cartels that mainly take the form of agreements on tariff arrangements thus distorting competition in the Electronic Communications and Postal Services markets.

Upon submitting the relevant application to the above-mentioned Program, companies which are or were involved in such unfair practices have the opportunity to be "rewarded" for cooperating with EETT in the framework of its investigation on anti-competitive practices. The contribution of a company to the identification of an infringement of the provisions of Law 703/1977 can result in immunity or reduction of the fine that they would otherwise be subjected to.

2.2.10. Carrier Pre-Selection

During 2010, the number of connections via Carrier Pre-Selection recorded a downward trend. At the beginning of the year, the Pre-Selection Connections amounted to 277,654, while at the end of 2010 they had fallen by approximately 26% to 205,613. This fall was due to the rise of connections via LLU and to the conversion of numerous Pre-Selection connections to Wholesale Line Rental (WLR) connections under which subscribers receive a joint bill for the calls they make.

2.2.11. Number Portability

Number Portability continued to rise significantly in 2010, thus resulting in the largest numbers within one year per category:

- A total of 1,279,685 phone numbers were ported, which is the largest number of ported numbers within one year.
- A total of 648,074 mobile telephony numbers were ported, which is the largest number of mobile telephony numbers ported within one year.
- A total of 631,611 fixed telephony numbers were ported, which is the largest number of fixed telephony numbers ported within one year.
- A total of 123,283 numbers were ported in June 2010, which is the largest number of ported numbers within one month.
- A total of 62,219 mobile telephony numbers were ported in June 2010, which is the largest number of mobile telephony numbers ported within one month.

By the end of 2010, a total of 4,152,415 numbers of fixed and mobile telephony had been ported. Table 2.1 presents the evolution of ported numbers of fixed and mobile telephony both on an annual basis and accumulatively.

In June 2010, EETT issued a Decision⁵⁵ for amending the Number Portability Regulation, further facilitating the right of consumers to change a fixed or mobile telephony operator and keep their number. The most important amendment is the significant reduction of the time required for Number Portability. More particularly, the following provisions were set out:

- The time required for Number Portability can not exceed 1 working day as of the date the donor operator accepted the subscriber's relevant application.
- In any case, the time required for Number Portability cannot exceed 3 working days as of the date the subscriber submitted the relevant application to the recipient operator.
- In case of a joint submission of applications for Number Portability and for full Local Loop Unbundling, the number must be ported on the same day that the loop is delivered.

The above reduction of the time required for Number Portability takes effect from December 1, 2010 for mobile telephony and from May 2, 2011 for fixed telephony.

In order to implement the above, coordinated changes had to be made in the information systems of the Electronic Communications providers and of the National Reference Database on Number Portability (EVDAF). Particularly in the case of fixed telephony, further coordination was required with the process of LLU, which was modified in 2010 by the relevant Reference Offer (see paragraph 2.2.2). In this context, EETT created two working groups, one for mobile and one for fixed telephony, with the participation of providers and executives of the EVDAF.

⁵⁵EETT Decision 566/016/03-06-2010, GG Issue 967/B/30-06-2010.



EETT coordinated these two groups in order to promote the effective implementation of its Decision for the benefit of the consumers, while it continues to support

the working group on fixed telephony until the date of implementation.

Table 2.1.
Evolution of Ported Fixed and Mobile Telephony Numbers

Year	Mobile Telephony		Fixed Telephony		Total	
	Quantity of Numbers	Accumulatively	Quantity of Numbers	Accumulatively	Quantity of Numbers	Accumulatively
2004*	16,123	16,123	1,156	1,156	17,279	17,279
2005	49,641	65,764	27,403	28,559	77,044	94,323
2006	117,767	183,531	44,798	73,357	162,565	256,888
2007	358,517	542,048	300,909	374,266	659,426	916,314
2008	362,601	904,649	562,961	937,227	925,562	1,841,876
2009	486,815	1,391,464	544,039	1,481,266	1,030,854	2,872,730
2010	648,074	2,039,538	631,611	2,112,877	1,279,685	4,152,415

* Operational start of the National Reference Database on Number Portability (EVDAF), which constitutes the special database used in facilitating the implementation of Number Portability in Greece, began its operation.

2.2.12. Cost Accounting Audits

EETT, in cooperation with independent chartered auditors, has carried out and completed the 2010 cost accounting audit with actual data for 2008 and forecasted data for 2009 and 2010. The audit started at the beginning of November 2009 and was completed by April 2010. By a relevant Decision⁵⁶, EETT approved the results of OTE's cost accounting audit stipulating the pricelists for the services in relation to the regulated Wholesale Markets for which OTE is subject to regulatory obligations for price control, cost accounting and accounting separation, on the one hand, and relating to the regulated Retail Markets in which OTE carries the obligation to control prices in the form of cost-orientation, on the other. This cost accounting audit addressed a range of services⁵⁷ whose costs were calculated on the basis of the following two cost accounting methodologies: i) Long Run Average Incremental Cost (LRAIC) and ii) Fully Distributed Cost (FDC).

According to this Decision, transitional provisions were defined so as to allow OTE to submit:

(i) The prices and the full supporting documents for the calculation of the monthly fee for duct occupation and use and the dark fiber monthly fee.

(ii) The Reference Models that entailed the results and the calculations corresponding to the LRAIC/CC model⁵⁸.

The above were submitted by OTE within the set deadline and were approved by a Decision⁵⁹ of EETT.

Pursuant to the 2010 cost accounting audit and in compliance with the relevant EETT Decisions⁶⁰, OTE posted for the first time on its webpage in September 2010 the cost accounting data and in particular the Reference Models of the LRAIC cost accounting system (LRAIC tables). This action contributes to the promotion of transparency in the Electronic Communications market, as it gives to the other providers an insight to the individual costs comprising the wholesale price of the most significant regulated services, which fall under the

⁵⁶EETT Decision 562/029/22-04-2010, GG issue 668/B/18-05-2010.

⁵⁷Interconnection, LLU (including Collocation services), WBA, Leased Interconnection Lines, wholesale and retail end-to-end Leased Lines and Number Portability.

⁵⁸According to the provisions of Appendix A of EETT Decision 482/051/26-05-2008, GG Issue 1151/B//24-06-2008.

⁵⁹EETT Decision 573/11/22-07-2010, GG Issue 1348/B/01-09-2010.

⁶⁰EETT Decisions 482/051/26-05-2008, GG Issue 1151/B/24-06-2008, 562/029/22-04-2010, GG Issue 668/B/18-05-2010 and 573/11/22-07-2010, GG Issue 1348/B/01-09-2010.



obligation of cost-orientation.

What is more, in November 2010, EETT commenced the 2011 cost accounting audit of OTE with actual data as of 2009. The submission of the majority of data by OTE for this specific audit started in early October 2010 and the results are expected to be announced in the first months of 2011.

2.2.13. Accounting Separation

Fixed Telephony

According to a relevant EETT Decision⁶¹, OTE specified and regulated, inter alia, the elements required for the implementation of its accounting separation obligation in the individually defined Electronic Communications markets in which it holds SMP.

In the context of the 2010 cost accounting audit with actual data as of 2008, OTE submitted the accounting separation statements to be audited. In the course of this audit, EETT identified certain weaknesses in its implementation and especially in the transfer prices. As a result, EETT submitted to OTE some improvement proposals for overcoming these weaknesses, which will be assessed during the 2011 cost accounting audit with actual data as of 2009.

2.2.14 Electronic Signature

EETT posts on its webpage the Trusted Service List (TSL) of supervised/accredited Certified Service Providers (CSP) that includes information on all CSPs which issue recognized certificates and are supervised/accredited by EETT in matters pertinent to their compliance with the relevant provisions of Directive 1999/93/EC.

The publication of this List aims at facilitating effective cross-border use of Electronic Signatures based on recognized certificates and at promoting trust in Electronic Signatures irrespective of the member state in which the signee or the provider issuing the recognized certificate is based. In addition, it represents a significant step forward towards facilitating the interoperability of information systems between and among the EU member states,

so that procedures and formalities for accessing and exercising service provision activities can be easily carried out either remotely or on-line, as dictated by Directive⁶² 2006/123/EC pertaining to services within the EU market.

Additionally, the European Commission issued a Decision⁶³ obliging member states to sign electronically the "machine processable" form (.xml file) of their Trusted Service Lists and to publish a human readable form (.pdf file) of the Trusted Service List through a secure channel so as to ensure its authenticity and integrity. In order to implement the above, EETT signs as a legal entity the Trusted Service List with the relevant electronic certificate published by the Certification Authority of the Greek Government.

2.2.15. Domain Name Assignment

The total number of Domain Names including the sub-domains (com.gr, net.gr, org.gr, edu.gr, gov.gr) can be seen in Table 2.2. Also, Table 2.3. presents the number of assignments in relation to applications per month for January-December 2010. For reasons of comparability between the figures appearing in the Tables of Domain Names assigned and applied for, the time reference set corresponds to the date the application was submitted rather than the date on which EETT reached an assignment/rejection Decision.

Table 2.2.
Assigned [.gr] Domain Names, 2007-2010

Domain Level	2007	2008	2009	2010
.gr	194,307	239,623	283,643	318,852
.com.gr	8,283	10,142	12,029	13,169
.net.gr	749	841	895	852
.org.gr	413	533	599	590
.edu.gr	631	746	902	1,016
.gov.gr	105	473	605	651
Total	204,488	252,358	298,673	335,130

⁶¹EETT Decision 482/051/26-05-2008, GG Issue 1151/B/24-06-2008.

⁶²Directive 2006/123/EC of the European Parliament and the Council of December 12, 2006, on services in the internal market.

⁶³Decision of July 28, 2010, on amending Decision 2009/767/EC on the establishment, maintenance and publication of trusted lists for certification service providers who are supervised/accredited by the member states.



Table 2.3.

Number of Assigned [.gr] Domain Names
in relation to Applications, 2010

Months	Applications	Assignments	Rejections
January	9,958	8,273	271
February	8,792	8,044	192
March	9,471	8,393	243
April	8,308	7,423	164
May	8,524	7,586	212
June	8,201	7,443	215
July	7,769	7,073	177
August	5,895	5,145	179
September	8,973	8,129	190
October	10,393	8,424	187
November	10,640	8,632	202
December	9,267	8,009	278
Total	106,191	92,574	2,510

In July 2010, EETT announced a new Public Consultation with respect to the amendment of the Regulation on the Management and Assignment of [.gr] Domain Names. It must be noted that a similar process had been conducted in July 2009 but a new Consultation was deemed necessary for incorporating the comments of the participants as well as the new amendments aiming at further improving the method of domain name assignment and the operation of registrars.

2.2.16. Wholesale Leased Lines

By a relevant Decision⁶⁴, EETT approved OTE's Reference Offer for the provision of Wholesale Leased Lines, having taken into consideration the comments submitted in the context of the relevant Public Consultation which was held in the period December 24, 2009 - February 15, 2010. The main amendments introduced are the following:

1. The full span transmission link is a separate service following the optimum path in the OTE network. It is treated as a separate (cost accounting) product based on the costs created for its provision.
2. The connected extension circuit is a separate service. The routing follows the best practice of the OTE network. This service will be treated as a separate (cost accounting) product based on the costs created for its provision.

3. The new product "Circuit connected end to end (p-t-p)". Based on this new service, the provider will apply for an end to end (p-t-p) circuit instead of a connected circuit with a terminating-trunk-terminating segment or a terminating-terminating segment. The product follows the optimum path in the OTE network and is treated as a separate (cost accounting) product, based on the costs created for its provision.
4. Increase of the number of the Leased Line Central Nodes (LLCN) by adding one further node.
5. Consolidation of Reference Offers for part circuits and terminating-trunk segments of Leased Lines based on the following:
 - i) The part circuits terminating in their own LLCN or L/E are incorporated without a kilometer limit into the category of terminating segments and the entitled party submits an application for obtaining a terminating segment.
 - ii) The part circuits terminating in a "foreign" LLCN are incorporated without a kilometer limit into the category of connected circuits of terminating-trunk segments. The provision of part circuits is conducted according to the terms and conditions for the provision of connected circuits of Wholesale Leased Lines and the entitled party submits an application for obtaining a connected circuit with a terminating-trunk segment.
 - iii) Extension of the list of delivery points for terminating and trunk segments in full-span and in-span transmission links so as to include not only the 45 LLCN but also the 204 L/E mentioned in the Reference Offer for terminating-trunk segments.
6. Harmonization of the processes of Collocation with the provisions in the Reference Offer for LLU.

2.2.17. Wholesale Rental of Public Telephone Network Access Lines

Wholesale Line Rental (WLR) offers to alternative providers the possibility to rent out access lines to the end user in wholesale terms, and to resell them to consumers. In this way, the alternative provider has a complete retail relationship with the customer with respect to all telephone services, issuing a joint bill that covers both the access line and the telephone calls. At the moment, there are mainly two active providers. The following Table presents the upward trend observed in the number of active connections of WLR in the course

⁶⁴EETT Decision 570/300/08-07-2010 "Approval of OTE's Reference Offer for the provision of Wholesale Leased Lines pursuant to EETT Decisions 401/014/06-09-2006 (GG Issue 1419/B/23-09-2006), 470/0370/04-03-2008 (GG Issue 498/B/20-03-2008), 477/002/23-04-2008 (GG Issue 987/B/28-05-2008) and 531/064/23-07-2009 (GG Issue 1552/B/28-07-2009)", GG Issue 1116/B/22-07-2010.



of 2010.

Table 2.4.

Number of WLR Active Connections	
01-01-2010	41,539
30-06-2010	60,237
31-12-2010	72,853

2.2.18. Collocation

According to Law 3431/2006, it is necessary to promote Collocation and the joint use of facilities between providers, especially in cases involving the protection of the environment, public health and security, as well as in cases where spatial or urban planning objectives have to be satisfied. Taking into account the situation in the mobile telephony market as well as the providers' recurrent requests where EETT must intervene in order to attain an agreement on the Collocation of antennas, EETT has conducted a Public Consultation for amending the Collocation Regulation⁶⁵.

More specifically, article 9 of the relevant Regulation includes a special reference to the terms required for any framework agreement on the provision of Collocation services and the joint use of facilities. In this perspective, EETT prepared a model for a framework agreement, determining the minimum content and offering the interested parties the ability to make amendments or additions, if they mutually agree. This model of the framework agreement outlines the terms, conditions and procedures for the provision of Collocation services and/or the joint use of facilities for installing and operating stations, in the context of the provision of mobile Electronic Communications services and of Electronic Communications services through fixed wireless access. After the conclusion of the Public Consultation, EETT issued a Decision⁶⁶ amending the Collocation Regulation in order to incorporate the proposed model of the framework agreement.

2.2.19. National Numbering Plan

By a relevant Decision⁶⁷ and in line with the Decision by the MITN⁶⁸, EETT approved the amendment of the Regulation on the Management and Assignment of the Numbering Resources of the NNP, taking into consideration the

comments submitted by the interested parties in the context of the relevant Public Consultation conducted in the period July 2 – August 3, 2009 and April 12 – May 12, 2010. The main amendments introduced are listed below:

- A number user, who has been secondarily assigned sets of 10,000 numbers, has the possibility to transfer them to a new provider subsequent to a relevant application to EETT.
- SMS/MMS can be sent/received from/to numbers of the series 800, 801, 70 and short codes of the series 10, 11 (subject to the special provisions on the series 116 and 118), 15, 181-183 and 188.
- The amount of retail charge for calls to personal numbers (the charge for calls to the 70 numbering series can not exceed the charge of calls to fixed or mobile numbers) is regulated.
- The ten-digit numbers of the 806, 812, 825, 850 and 875 numbering series can be used for MIS.
- Numbers for pre-paid calls are secondarily assigned only to holders of General Authorizations for pre-paid cards.
- According to the relevant Decisions of the EU, short codes of the 116 numbering series are used for social services such as references to missing children or psychological support to children and adults.
- Short codes of the 14, 19 and 54 numbering series are secondarily assigned only to providers of MIS.
- An application for number assignment can be submitted via e-mail with electronic signature and via the system of on-line submission of numbering applications.

2.2.20. Electronic Submission of General Authorizations and Numbers

Aiming at serving better the Electronic Communications providers and processing faster their applications, EETT adopted in July 2010 a new mode of communication using the principles of Electronic Governance. More specifically, via the appropriate web application, which is available on EETT's website, the providers can electronically submit applications with regard to Electronic Communications services. Also, they have the ability, if they wish, to submit electronically at the same time all the necessary supporting documents/data. In the initial stage of implementation,

⁶⁵EETT Decision 472/171/21-03-2008, GG Issue 885/B/14-05-2008.

⁶⁶EETT Decision 570/033/08-07-2010, GG Issue 1330/B/30-08-2010.

⁶⁷EETT Decision 570/028/08-07-2010 "Amendment of EETT Decision 441/121/21-06-2007 "Regulation on the Management and Assignment of Numbering Resources of the National Numbering Plan", GG Issue 1148/B/30-07-2010.

⁶⁸Decision no Ec. 26073/937/26-05-2010 "Amendment of the Ministerial Decision 26634/924/03-05-2007 "National Numbering Plan of Electronic Communication Services" (GG Issue 805/B/09-06-2010), which was published subsequent to a relevant recommendation by EETT (EETT Decision 545/036/17-12-2009 "Recommendation to the Ministry of Infrastructures, Transport and Networks for amending Ministerial Decision 26634/924/03-05-2007 "National Numbering Plan of Electronic Communications Services").



the possibility of electronically submitting applications includes the following categories of services:

- General Authorization on Electronic Communications.
- Submitting an application for obtaining a General Authorization on launching one or more Electronic Communication activities.
- Registrars of [.gr] Domain Names.
- Notifying EETT about the operation of a provider as a Domain Names registrar.
- Electronic Signatures Certifiers.
- Electronic Signature CSPs submitting information about themselves and the services they provide, so as to be enlisted in EETT's Registry of CSPs based in Greece.
- A Point of Service Activation (PSA) for Inmarsat Terminals for the provision of satellite services via mobile terrestrial stations.
- Submitting the relevant registration declaration on the operation of a provider as an Inmarsat PSA in Greece.
- NNP number assignment.
- Submitting an application for assignment of numbering resources.

By means of the electronic submission of applications, providers are informed about whether the documents submitted are complete and their application is immediately transferred to be examined and processed by the competent employee. Also, they have the possibility to be informed about the progress of their application and about any possible deficiencies/clarifications.

EETT's objective is to set this particular web application as the sole communication channel with the providers regarding the submission of applications. In this framework, EETT continues to improve the web application, taking into consideration the comments submitted by the providers-users, in order to enrich it with further possibilities in the future.

2.2.21. Premium Rate Services

Taking into account the complaints submitted during 2010 relating to cases of subscribers charged for Premium Short Message Services (PSMS) to short codes of the 54XXX series (e.g. votes, contests) that offer Premium Rate Services (PRS), EETT took the following actions:

1. Conducted technical inspections on MIS service providers (see section 2.4).
2. Conducted in October 2010 a new amendment and codification of the Code of Practice, which includes new regulations regarding subscription PRS. More

specifically, the new obligations imposed on providers are, inter alia, the following:

- The user can ask the provider of the network to which he/she is subscribed to block access to all PRS or to some numbering series. This blocking may also concern the reception of all PRS short messages or the PRS short messages from specific numbering series.
- The user must have access to a table containing all the provider's PRS services with information on charges, as well as the contact details of the PRS provider, via its website and in a way allowing the user to access that information on the home page easily and instantly.
- The monthly cost of a particular subscriber-only PRS for a particular subscriber (MSISDN) must not exceed 20 euros.
- Upon the registration of the user (MSISDN) to a new subscription PRS, a free informative message will be sent asking for his/her explicit consent if the total monthly cost of his/her subscriptions paid to the PRS provider exceeds 20 euros.
- If a user receives a PSMS, then the short code from which the message originated must be registered as the sender in the terminal equipment of the user.
- If the PSMS provider has been unsuccessfully sending SMS messages over 15 days (the messages do not terminate) to a registered subscriber, or has not received any SMS message from a subscriber for a period of 15 days, in contradiction to the provisions of the PRS service, then the provider must cancel his/her subscription to the relevant service, unless the subscriber asks to remain registered.
- The webpage, via which the user is subscribing to a service, must offer an option (empty tick box) with the caption: "I have been informed about the terms of use and I accept to activate the subscription service <name of service> <charge per time unit>". This option must be selected by the end user before he/she is allowed to register.

2.2.22. Regulation on International Roaming

In the framework of implementing the Regulation on International Roaming, the relevant Roaming charges continued to fall. More specifically, as of July 1st, 2010, all subscribers to Greek mobile telephony operators travelling to one of the countries of the EU, as well as to Iceland, Lichtenstein or Norway, will be charged as follows:

- Up to 0.39 euro/minute for making a call

- Up to 0.15 euro/minute for receiving a call
- Up to 0.11 euro/SMS for receiving an SMS

Moreover, the Roaming Regulation stipulates the reduction of the wholesale cost of Internet use (1 euro per MB since July 1, 2009 gradually reduced to 0.5 euro in July 1, 2011) and the establishment of mechanisms for the protection of consumers after using their mobile phone or laptop to access the Internet while in roaming mode.

During 2010, EETT, in cooperation with BEREC, took actions in order to verify the compliance of operators with the Regulation, monitored the developments in the roaming market and drafted proposals for revising the Regulation.

2.2.23. Identification of Anonymous Users of Pre-Paid Telephony

According to Law 3783/2009⁶⁹, the holders and users of mobile telephony equipment and services under pre-paid, post-paid or other form of mobile status, must be identified until July 30, 2010. After this deadline, the providers are obliged to terminate the provision of mobile telephony to any anonymous subscriber, even if he/she has paid the requisite fee.

The Law grants EETT the responsibility to conduct regular or ad hoc inspections on providers with regard to their compliance with the obligation of identifying the subscribers and to impose administrative sanctions in cases of infringement. In the framework of its competences, EETT coordinated meetings with providers for resolving technical and procedural issues concerning subscriber identification and the termination of services to anonymous subscribers, while it also conducted ad hoc inspections and published clarifications and explanations on the provisions of Law 3783/2009 addressed to both providers and consumers, in order to answer their questions.

2.2.24. Determining the Minimum Level of Itemized Billing for Public Telephone Services

Pursuant to a Public Consultation, EETT decided⁷⁰ to issue a Regulation on determining the Minimum Level of Itemized Billing (MLIB) for Public Telephone Services, so that subscribers can receive the basic information in their bill allowing them to (i) control and verify their charges for using the public telephone network, as well as (ii) monitor appropriately the use and expenses with which they are burdened.

The MLIB will be offered free of charge and will include, inter alia, the following:

- Aggregated data on services such as calls, SMS, MMS, data transfer, as well as a classification based on call categories (e.g., local, national, calls to mobile, MIS) and on networks (e.g., calls within the mobile network, outside the mobile network).
- The total real duration of subscribers' calls and the total invoiced duration. The invoiced duration usually differs from the real duration because it depends on the minimum call charge and the billing unit of the service received by the subscriber.
- Information on any modification in the billing method of the subscriber's connection (e.g., billing unit, minimum call charge, charges for calls or SMS) during the period of that particular bill. The bill must mention, in a clearly visible place, the charges before and after the modification as well as the time in which this modification took place.

Subsequent to the subscribers' request, the providers are obliged to provide a free enriched PRS that includes further details on particular items. More specifically, for PRS services, it must include information such as:

- An itemized presentation of all PRS charges, regardless of the amount, in a special section of the bill.
- Mandatory mention of the PRS provider title or, in case it is unknown, of the provider through which the number was assigned in the first place.
- An itemized presentation of the chargeable incoming PRS text messages.

If subscribers do not wish to receive the MLIB, then they must explicitly inform their provider, and they can also ask to have their simple or enriched MLIB sent to them electronically. The dispatch of invoices with the MLIB will begin in the second semester of 2011.

2.3. Broadband Development

2.3.1. The Progress of Broadband in Greece

The number of broadband connections rose to 2,250,000 at the end of 2010 compared to 1,916,000 at the end of 2009. Broadband penetration in the population reached 19.9%, though demonstrating a significant decline in the growth rate compared to the preceding years (an increase of 2.9 lines per 100 residents in 2010 as opposed to 3.6 in 2009 and 4.3 in 2008). Nevertheless, in the first semester of 2010, Greece was the second country in the EU, after Malta, in terms of broadband penetration increase (1.61%

⁶⁹"Identification of owners and users of mobile telephony equipment and services and other provisions", GG Issue 136/A/07-08-2009.

⁷⁰EETT Decision 588/21/16-12-2010, GG Issue 2153/B/31-12-2010.

lines per 100 residents). This penetration rate is almost double than the European average (0.86 lines per 100 residents). However, according to the data of this period (June 2010), Greece continued to hold the 23rd place among the 27 member states of the EU.

LLU remains the main mode of broadband development, as demonstrated by the continuous rise in the percentage of broadband lines provided via LLU (49.1% at the end of 2010 compared to 41.5% at the end of 2009). In contrast, access via ARYS lines (wholesale or retail) kept falling and reached 50.67% of all broadband lines compared to 58% at the end of 2009. Finally, the number of lines of other technologies remains at very low levels (the relevant lines represent less than 0.5% of broadband lines). Mobile broadband increased modestly, with the penetration of Internet subscribers via 3G networks and the use of laptops amounting to 2.6% at the end of year compared to nearly 2% at the end of 2009.

2.3.2. Next Generation Access Networks

In the aftermath of two Consultations and almost two years after the publication of the first draft Recommendation, the European Commission issued in September 2010 a Recommendation⁷¹ on Next Generation Access Networks (NGA), which is expected to boost investments in high speed broadband networks in accordance with the basic objective of the Commission's Digital Agenda and of the "Europe 2020" strategy. The Recommendation is only part of the package of "broadband measures" recently introduced by the Commission and essentially it provides guidelines to the National Regulatory Authorities (NRAs) regarding the procedure of market analysis in an NGA environment. At the same time, the member states have to ensure⁷² that the NRAs will take into special consideration the Commission's Recommendation and will be able to justify any divergence from it. Therefore, if a Regulatory Authority chooses not to follow any of the Commission's Recommendations, then it must provide a written explanation. The level of the Regulatory Authorities' compliance with the preceding Recommendations up till now is high.

More specifically, the Recommendation lays down a clear regulatory framework (a common European approach to the regulation of NGA networks) for telecommunications providers, ensuring the right balance between the need for promoting investments and protecting competition. Furthermore, it dictates to the NRAs how

to regulate the competitive access of third parties to the NGAs of the incumbent (dominant) providers and also provides them with the tools for supporting the new market entrants in an NGA environment, on the one hand, and the investments in infrastructures by the established providers, on the other. For example, in the case of imposing a cost-orientation obligation on prices for wholesale access, the NRAs must also take into consideration the possibility of investment risk via a risk premium. In addition, the Recommendation aims at facilitating them to climb the "investment ladder" and to gradually develop their own infrastructure.

It must be noted that the installation of NGAs in the EU is still at an early stage. However, an increasing number of Regulatory Authorities have started to examine issues related to the regulation of access to NGAs as part of their regular procedures of market analysis. In the last months of 2010, the European Commission was notified about the significant number of NGA regulation cases. As a result, the Commission decided that there is a clear risk of divergences between the telecommunications markets of the member states, if it does not provide guidelines to the NRAs. Such a situation could lead to market distortions and to uncertainty for companies investing in NGAs. Consequently, the Commission's Recommendation is expected to bring more cohesion and clarity in the Decisions of the NRAs in order to encourage timely and effective investment in the sector of NGAs for the entire single market of the EU, strengthening competition also in the market of broadband services. More particularly, some of the principles that must be observed by the NRAs and are strengthened by the Recommendation are listed below:

- No "regulatory holiday" for the dominant companies.
- Regulation on prices for wholesale access to NGAs, which will fully reflect the investment risk and will allow companies to invest profitably.
- The NRAs must have at their disposal a full range of regulatory measures in order to select the appropriate combination, subject to the conditions of each national market, aiming at encouraging the entry of new players and strengthening competition in infrastructures.
- The ex ante regulation must reflect the differences in competition conditions between the individual markets and sectors (rural and urban) within a particular market, resulting in softer regulation in cases where the competitive forces are strong (e.g., cable television operators, mobile broadband).

⁷¹http://ec.europa.eu/information_society/policy/ecommm/library/recomm_guidelines/index_en.htm

⁷²According to article 19 of the Framework-Directive (2002/21/EC).



- Strong support for regulations on joint investment in NGA networks and provisions for determining lower access prices against, for example, long-term initial commitments or contracts based on the volume of access products.

In order to ensure the best possible preparation for NGA networks, EETT has taken the appropriate actions since July 2010 (communication with providers, participation in the relevant European working groups etc.). At the same time, EETT, in cooperation with an external consultant, is conducting a relevant study focusing on the possible regulatory obligations that can be applied to the Greek telecommunications market.

2.3.3. Broadband Quality Measurements Node

In the course of 2010, the research and development activities of the Institute of Communication and Computers Systems (EPISEY) advanced further aiming at creating a new application that will complement the services of the Broadband Quality Measurements Node (BQMN). More particularly, this application will include the geographic mapping of the measurements of the quality characteristics of broadband connections in our country, as well as individualized statistics services per broadband connection. This project is expected to be delivered within 2011.

2.3.4. Liberalization of the Use of the GSM 900 Spectrum for UMTS Services

In 2009, the European Parliament and the Commission issued Directive 2009/114/EC⁷³ of September 16, 2009 concerning the amendment of Directive 87/372/EEC, which obliged the member states to allocate the 900 MHz band for the development of mobile communications networks by using only the GSM technology. By amending the Directive, the Community lifts this restriction and allows member states to allocate the 900 MHz and 1800 MHz bands for developing not only GSM but also UMTS systems, as well as related terrestrial systems of electronic communications.

The lifting of restrictions in the 900 MHz and 1800 MHz bands will facilitate the development of new wireless technologies and services, third generation (3G) mobile telephony networks supporting innovative services in communication, access and content. Furthermore, the expansion of new networks, in combination with the simplification of the licensing procedure for antenna

systems, is expected to contribute to the dissemination of mobile broadband in our country. The effective utilization of networks can bring important development benefits for the entire Greek economy and society. The possibility of offering advanced voice, data transfer and content services, both in the cities and in the sparsely populated, island and rural areas, is a dynamic tool for bridging the “digital gap” between center and periphery.

Taking the responsibility of determining and managing radiofrequency rights, EETT has conducted since March 2010 a series of studies on the more immediate and effective harmonization of Directive 2009/114/EC with the national law. In the same period, it began to examine thoroughly the current assignment of the 900 MHz band to mobile telephony operators in the Greek territory in order to investigate any distortions in the relevant mobile telephony markets. Moreover, EETT examined whether the amendment of the rights of use of operators, who were granted rights to use frequencies in the 900 MHz band, is objectively justified and proportional, in order to propose a more fair redistribution in case of distortions, subsequent to a Public Consultation.

In the context of implementing Directive 2009/114/EC and harmonizing it with Greek law, a Joint Ministerial Decision (JMD)⁷⁴ was issued in July 2010 by the Minister of National Defense, the Minister of Economy, Competitiveness and Shipping and the Minister of Infrastructures, Transport and Networks.

2.3.5. Regulation on Access Network Frequency Plan

After conducting a study of international practices and receiving the relevant notices from the Electronic Communications providers operating in the LLU market, EETT decided that it must establish a set of rules governing the development and operation of the different systems in specific points of the access network (L/E, Outdoor Distribution Frames for Copper Networks-KV and Optical Access Networks-ONU, end user equipment), in order to minimize the mutual interferences due to the introduction of xDSL technology signals. These rules will be applied by both the SMP provider (OTE) and the alternative providers who offer xDSL technology broadband services via the current access network. Accepting the common rules will ensure equal access to the network for all market operators and will prevent behaviors that may be contrary to fair competition.

⁷³EE L 274/25 of 20-10-2009.

⁷⁴Decision 58626/2224/F1/10-06-2010 “Compliance to the provisions of Directive 2009/114/EC of the European Parliament and of the Council of 16th September 2009 amending Council Directive 87/372/EEC on the frequency bands to be reserved for the coordinated introduction of public pan-European cellular digital land-based mobile communications in the Community”, GG Issue 918/B/24-06-2010.



The benefits that will accrue from implementing the Regulation on Access Network Frequency Plan are the following:

- Maximizing the possibilities of the equipment connected to KV/ONU with regard to the range of geographic coverage and the provision of higher quality broadband services.
- Minimizing (with the prospect of eliminating) the mutual interferences between the xDSL signals that damage the quality of the services provided to consumers.
- Giving all providers operating in the broadband services market the ability to introduce new technologies via installing equipment in the access network in order to offer innovative services to their subscribers.
- Using more effectively the resources of the access network by creating a sound environment for investments in the broadband services market.
- Minimizing potential requests for dispute resolution on issues relating to mutual interferences between providers and settling disputes in a way that is both transparent and known in advance.
- Ensuring technological neutrality in the use of the access network.

In order to achieve the above aims, EETT has already established⁷⁵ a relevant Working Group, which will conduct a Public Consultation in cooperation with the parties involved and will draw up a draft Regulation within 2011.

2.3.6. Convergence of Telecommunications and Media

Licensing and Operation of Digital Broadcasting Network Providers

Pursuant to the amendment of the Regulation on General Authorizations⁷⁶ in April 2009, the operators who were interested in the provision of a terrestrial digital network using frequencies for broadcasting a radio-television signal have made registration declarations in the Registry of Providers of Electronic Communications Networks and Services kept by EETT in order to receive the respective General Authorizations. By the end of December 2010, 21 operators had been registered⁷⁷.

⁷⁵EETT Decision 585/15/25-11-2010.

⁷⁶EETT Decision 513/140/03-03-2009, GG Issue 492/B/18-03-2009.

⁷⁷Based on data from EETT's website on 22-12-2010.

⁷⁸EETT Decision 548/19/15-01-2010, GG Issue 161/B/19-02-2010.

Radio interfaces – Radio-Television Issues

In accordance with Law 3592/2007, EETT issued a Regulation⁷⁸ laying down the obligations of the operators concerning access to Application Program Interfaces (API) and to Electronic Program Guides (EPG). The Regulation aims at ensuring the end users' ability to access specific digital radio-television transmissions and that such access will be offered on fair, reasonable and equitable terms. What is more, the Regulation specifies that during access provision the operators must meet the following obligations:

- To make available all the required information that will allow providers of interactive digital television services to provide in a full and functional manner all the services supported by the API.
- To publish the following, prior to providing the service and within a reasonable period of time as determined by EETT: a) the technical characteristics of the API, b) any kind of amendment to an already published Interface, and c) all Decisions on the withdrawal of any Interface already published.

In addition, the operators are required to publish the technical characteristics of the API in detail, fully and adequately.

Finally, the Regulation specifies that the operators providing access to EPG are obliged to:

- Ensure that the terms of any agreement with radio-television operators for the provision of EPG services are fair, reasonable and equitable.
- Ensure that the presentation order of the providing programs (content) follows an objective pattern. In addition, the basic principle followed in presenting the programs must also be published. The content provider will be responsible for the content appearing on the EPG.
- Ensure that all television viewers, provided they possess the necessary equipment, enjoy equal treatment when receiving the information included in the EPG.
- Facilitate access by and to all the television services included in the EPG services, which must be made easily available to all television viewers possessing the appropriate equipment.
- Take special care so that people with disabilities can access the services they provide, as long as this is technically feasible, and provide them with all the necessary information on how to use the EPG in an easily accessible way.



2.4. EETT's Controlling and Monitoring Actions

In the course of 2010, EETT carried out 111 Hearings with respect to infringements on Electronic Communications

or competition law in relation to market operation issues. As a result of these Hearings, EETT imposed 16 fines and, in one case, issued an exonerative Decision.

Table 2.5.
Results of EETT Hearings in the Electronic Communications Sector, 2010

Subject	Number of Hearings	Fine	Recommendation	Exemption	Deletion	Other Sanctions/ Decisions
Carrier Pre-Selection	1	1	-	-	-	-
Local Loop Unbundling	3	3	-	-	-	-
Premium Rate Services	4	3	1	-	-	-
Universal Service	1	1	-	-	-	-
Numbering	3	2	1	-	-	-
Competition/ Significant Market Power	1	-	-	1	-	-
Number Portability	1	1	-	-	-	-
Domain Names	68	-	-	-	50	7 rejections 10 in file 1 domain name revoked
Domain Name Registrars	21	-	-	-	-	-
General Authorization	3	3	-	-	-	-
Other	5	2	-	-	-	3
Total	111	16	2	1	50	21



2.5. Goals

EETT's main strategic goals in the Electronic Communications sector for 2011 are the following:

A. Development of the Electronic Communications Market

- A1. To ensure the conditions for promoting competition in the market of fixed and mobile telephony at the level of networks and services.
- A2. To encourage Collocation and the joint use of infrastructures in fixed and mobile telephony, aiming ultimately at reducing the cost of network development and protecting the environment.
- A3. To facilitate the smooth transition to NGAs in a way that ensures the longevity of new infrastructures but also the return on existing investments.

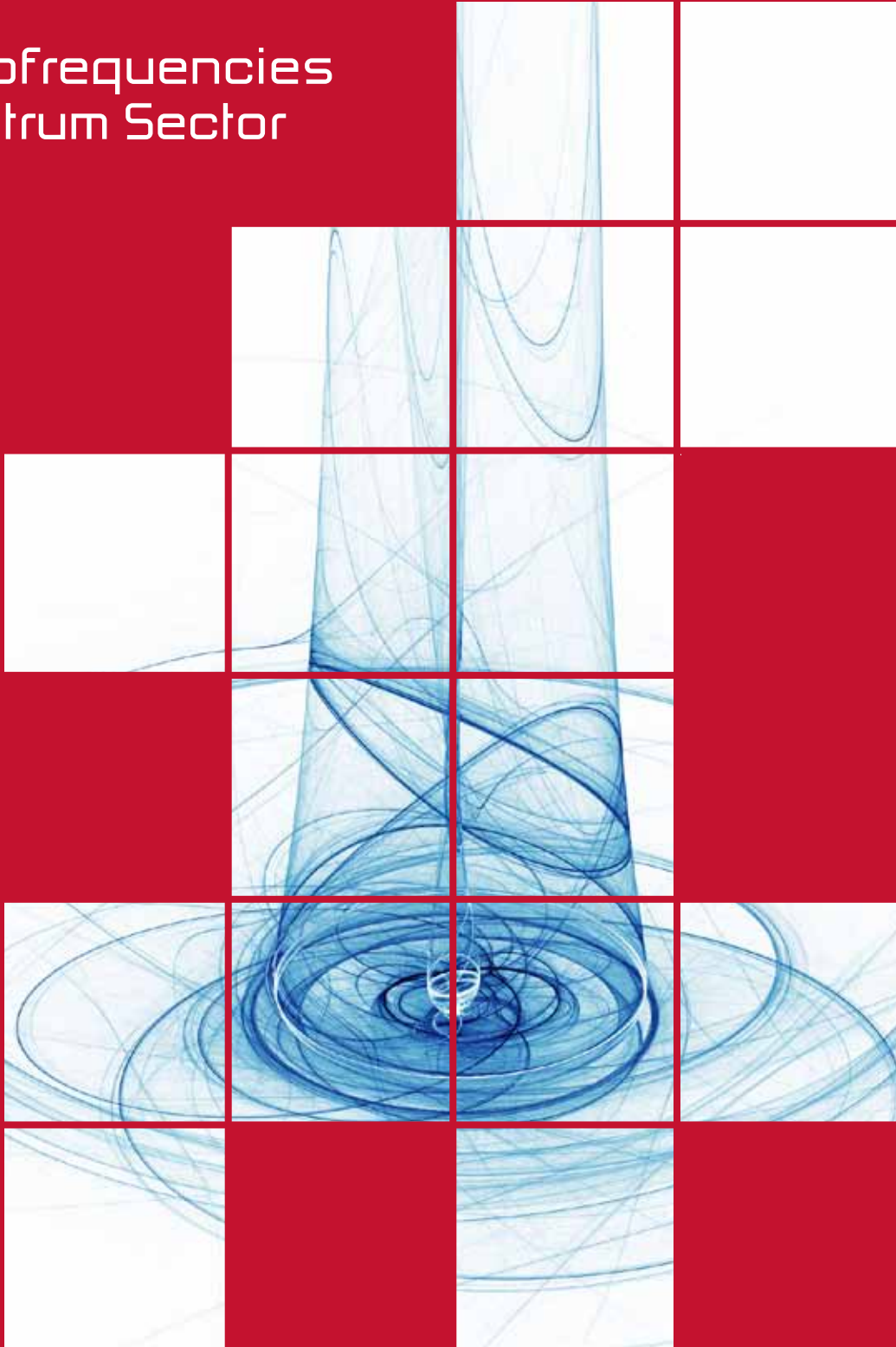
B. Protection of Consumer Rights

- B1. To strengthen the role of the consumer (a) by ensuring transparent information on pricing and quality issues and (b) by facilitating Number Portability and the smooth switchover from one provider to another.
- B2. To ensure the quality and availability of Electronic Communications services in Greece.
- B3. To protect the consumer from unfair practices, especially in the use and pricing of Electronic Communications services.
- B4. To inform and mobilize consumers as well as public and private sector organizations to adopt and utilize Electronic Communications and Internet services.



3

Radiofrequencies Spectrum Sector



During 2010, EETT continued to strenuously exercise its competences regarding spectrum licensing, monitoring and controlling, as well as supervising the radio equipment and telecommunications terminal equipment market.

In this context, EETT focused on the optimal technical and financial management of the radiofrequency spectrum and accelerated the process of granting radiofrequency rights of use to television stations, responding faster to the relevant applications. At the same time, EETT conducted inspections with regard to the compliance of users with the terms of the spectrum rights of use and the lawfulness of transmissions. Lastly, in 2010, EETT increased the inspections on the radio and telecommunications terminal equipment markets in order to identify cases of non-compliance with the administrative and technical requirements set by the current legislation.

All the actions taken by EETT in the radiofrequencies spectrum sector in 2010 are analyzed in the following sections.

3.1. Spectrum Management and Monitoring

3.1.1. Fixed Service

The Fixed Service comprises wireless Electronic Communications networks between specific fixed points. Depending on the needs these networks serve, they may fall under one of the following two main categories:

- Providing Electronic Communications services to the public.
- Serving own telecommunications needs.

In the majority of cases, the operation of these networks requires granting the relevant radiofrequency right of use. During 2010, the following were granted:

- 1,458 new radiofrequency rights of use for point-to-point links, concerning mainly backbone networks of Electronic Communications service providers.
- 111 Radiofrequency rights of use for serving own Electronic Communications needs, mainly for the transfer of radio or television programs from the production point (studio) to the transmission center.

With regard to legality inspections and interference problems in fixed service networks, EETT received a total of 66 complaints. In particular:

- 33 for legality inspections and interference problems in wireless access systems (Wi-Fi and Wi-MAX).
- 26 for legality inspections of radio-electric links.
- 7 for interference inspections in licensed radio-electric links.

Moreover, EETT conducted extended inspections on radio link signals transmitted in frequencies of up to 3 GHz

throughout Greece. The inspections revealed illegal, non-licensed radio link broadcasts for the transmission of radio-television station signal in frequency bands allocated for GSM/DCS/UMTS mobile telephony services as well as for the development of defense systems and aeronautical radio navigation systems.

As a result, EETT cautioned 31 stations involved in violations to cease operation of the radio links in question and apply for obtaining Radiofrequency Rights of Use. Most stations complied, while for those who did not, EETT initiated the appropriate procedures for the imposition of the prescribed administrative sanctions. Moreover, EETT sent letters to 30 radio stations that had not been granted a radiofrequency right of use for a signal transmission radio link for which no relevant broadcasts had been recorded during the checks. More specifically, EETT requested to be informed as to the method used by each radio station for transferring their program from the production point (studio) to the transmission network (broadcasting transmitter). Responding to the Regulatory Authority's request, most radio stations applied for obtaining a radiofrequency right of use for radio links, whereas some stations claimed that they do not use any radio link.

3.1.2. Satellite Services

The installation and operation of terrestrial satellite stations requires national and international coordination with the existing terrestrial networks of fixed and satellite service, aiming at the avoidance of interference. In this context, EETT implemented all the procedures stipulated by the International Telecommunications Union (ITU) and



harmonized domestic and foreign satellite stations with the existing wireless networks in 2010.

Moreover, in 2010:

- 4 granted Radiofrequency Rights of Use for terrestrial satellite stations were amended.
- 2 Radiofrequency Rights of Use were renewed for portable terrestrial Satellite News Gathering (SNG) stations of Electronic Communications providers in cooperation with the Civil Aviation Authority (CAA) and the Hellenic National Defense General Staff (HNDGS).

In 2010, within the framework of satellite spectrum monitoring, EETT conducted a legality check pursuant to a complaint about interferences in satellite channel reception in Attica. Furthermore, EETT received complaints about interference problems in the 1400-1427 MHz band, which is used by the Soil Moisture and Ocean Salinity Satellite (SMOS) system for the passive sensing of the earth's surface, from terrestrial signal transmissions in various positions throughout Greece. After conducting the inspections, EETT found out that most of the problems were caused by terrestrial radio links of the fixed service and it proceeded promptly to the necessary actions in order to resolve those problems. EETT continues to conduct such inspections in order to ensure the smooth operation of the SMOS system.

Mobile Satellite Services

The terms and conditions set by the European Parliament's Decision⁷⁹ on the selection and licensing of Mobile Satellite Services (MSS) systems have been incorporated into the Regulation on the Terms of Radiofrequency Use⁸⁰.

The licensing of MMS services is carried out in terms of General Authorization based on the above-mentioned Decision and on the national legislation.

By virtue of a Decision⁸¹ by the European Commission, two mobile satellite service providers, Inmarsat Ventures Limited and Solaris Mobile Limited, were selected to provide services in the 27 member states in a harmonized frequency band. The prescribed frequency band for the provision of MSS services is the 1980-2010 MHz and 2170-2200 MHz band.

Along with other member states, EETT participates in the Communication Committee's Working Group of the European Commission with the aim of reformulating, if necessary, the existing regulatory framework in order

to better facilitate the development of mobile satellite service. This project will be completed in May 2011.

3.1.3. Mobile Service

Mobile Telephony Networks

Mobile telephony networks comprise wireless digital sound and data transfer systems that use the GSM/DCS/UMTS cellular technology, whose operation requires obtaining a Radiofrequency Right of Use from EETT.

In 2010, EETT received 54 complaints relating to interferences in the reception frequencies of the base stations communicating with mobile telephones. Out of those complaints, 26 concerned interference problems in the Attica prefecture, 2 in the Thessaloniki prefecture and 26 were related to other prefectures of Greece.

In order to investigate the complaints in the Attica prefecture, EETT carried out inspections in all cases, resolving 19 of them, whereas new inspections are needed in 7 cases.

With regard to the Thessaloniki prefecture, 2 complaints were submitted relating to interferences in the networks of mobile telephony providers. In the inspections carried out by EETT, no interference signal was detected in the first case, whereas in the second case the source of interference was identified and its operation was terminated.

With regard to the 26 complaints related to the remaining prefectures, EETT carried out technical inspections in all cases, by prioritizing the most important ones for the smooth operation of the mobile telephony networks. In 23 of the examined cases, the interferences were detected and EETT took action in order to solve the problems, whereas new inspections are needed in 3 cases.

Interferences were mainly caused by:

- Mobile telephony repeater systems ("GSM Repeaters").
- Systems impeding the use of mobile telephony devices ("Jammers").
- Radio link systems for sound, image and/or data transmission from radio-television stations and military organizations.
- Transmissions from radio-television station broadcasting systems.
- Transmissions from domestic television signal amplifier systems and wireless alarm systems for cars.

⁷⁹EU Decision 626/2008/EC, 30-06-2008, "On the selection and authorization of systems providing mobile satellite services (MSS)".

⁸⁰EETT Decision 521/32/05-05-2009, GG Issue 1010/B/28-05-2009, "Regulation on the Terms of Use of Individual Radiofrequencies or Radiofrequency Bands".

⁸¹EU Decision 2009/449/EC, 13-05-2009, "On the selection of operators of pan-European systems providing mobile satellite services (MSS)".



Monitoring the Fulfillment of Mobile Telephony Operators' Obligations

The owners of Radiofrequency Rights of Use for mobile service are required to submit to EETT a report on network expansion for each semester. These reports include data on the terms of the relevant Rights of Use, such as the percentage of radio coverage that the provider must fulfill (geographical and demographic coverage percentages), the quality of service and the obligation of Collocation.

In 2010, EETT examined the network expansion reports submitted by the mobile telephony operators for the second semester of 2009 and the first semester of 2010. With regard to the key parameter of radio coverage, the reports revealed that all mobile telephony operators have fulfilled their obligations with respect to both the 2nd and the 3rd Generation networks.

Private Mobile Radio Networks

Private Mobile Radio (PMR) Networks are meant to cover the communication needs of various business users such as radio-taxi companies, security service providers, etc.

PMR Licenses fall under the category of General Authorizations⁸². Therefore, they are not granted by Prefectural Authorities but by EETT, with a simple entry in the Registry of Electronic Communications Networks Providers. Moreover, EETT is also responsible for granting Radiofrequency Rights of Use to PMR network owners. However, granting Radiofrequency Rights of Use to the networks of Prefectural Authorities, Ministries, Embassies, the National First Aid Center and other government bodies does not fall any more⁸³ within the scope of EETT's responsibilities.

In 2010, a total of 82 applications for PMR networks were submitted for both new networks and the modification or withdrawal of existing ones. In 74 of the above cases, a Radiofrequency Right of Use was granted or an existing one was modified. In 8 cases the relevant Rights were revoked.

In 2010, with respect to interference issues EETT received 20 complaints for interferences in PMR networks of radio-taxi associations, Municipalities and private companies. More specifically, in one of these cases, the interference problems were related to the GSM-R system which is used in the railway network from Kiato to Promachonas. Most of the problems were due to the use of non-licensed frequencies of the fixed or mobile service and to interference broadcasts from radio networks and radio-television station broadcasting systems. Additionally, 23 complaints were submitted concerning interference to remote systems and home electronics, as well as the legality of radio network antenna systems.

⁸²According to Law 3431/2006.

⁸³According to Law 3431/2006.

In the majority of the above cases, EETT carried out technical inspections, promptly scheduled the actions necessary for resolving the problems and, where needed, implemented the procedures for imposing the prescribed sanctions.

Ex Officio Inspections on the Installation and Operation of Private Mobile Radio Networks

In early 2010, EETT completed a series of inspections on the PMR networks of all radio-taxi companies of the Attica prefecture in order to find out whether they complied with the technical specifications of their installation and operation licenses. In this framework, EETT notified the companies that manage the country's ski centers with regard to the procedure for obtaining a Radiofrequency Right of Use for the lawful operation of PMR networks and required all respective data.

Furthermore, pursuant to complaints concerning the illegal operation of repeaters and the illegal use of radiofrequencies in the 146-148 MHz band in the Attica prefecture and following a series of ex officio inspections, EETT conducted a series of measurements with the fixed and the mobile monitoring stations. From the inspections carried out so far, repeaters operating with input frequencies in the 146-148 MHz band and output frequencies in the 442-443 MHz band were detected without the required Rights of Use by EETT.

3.1.4. Ancillary Services to Broadcasting and Program Making

The ancillary services to broadcasting and program making are an important category of services. Examples of such services are the transfer of radio-television programs from the production point to the transmission network and the coverage of sports events, outdoor performances or other special events. Coverage of those events requires radio equipment, such as wireless cameras and microphones, as well as portable microwave links and voice transmission systems. In order to meet the needs of radio or television stations (signal transmission links), EETT grants permanent Radiofrequency Rights of Use. It also grants temporary Radiofrequency Rights of Use for the coverage of scheduled events with a maximum duration of 2 months.

In 2010, pursuant to relevant requests, temporary Radiofrequency Rights of Use were granted to three Satellite News Gathering (SNG) stations. They mainly concerned requests by international users for portable satellite picture and sound transmission stations in order



to cover special events (e.g. VIP visits), sports events (preliminary rounds of Champions League 2010) and Helexpo (Thessaloniki International Exhibition). Also, pursuant to relevant requests, temporary Radiofrequency Rights of Use were granted to wireless cameras for the 5th Golf Tournament in the Messinia prefecture.

3.1.5. Radio and Television

Granting Rights of Use to Television Stations

As regards radio and television issues, EETT has been responsible since 2007⁸⁴ for monitoring the radio-television spectrum and for granting Radiofrequency Rights of Use to:

- Analogue national television stations, at locations they had not disclosed to the National Council for Radio and Television (NCRTV)⁸⁵.
- Analogue regional and local television stations⁸⁶, following a relevant application by the interested party.

Competence for granting Rights of Use is temporary and expires upon configuration of the Frequency Maps for analogue and/or digital television⁸⁷.

In 2010, with regard to the implementation of what has been mentioned above, EETT:

- Updated its database kept since 2008 with all the broadcasts of legally operating national, regional and local television stations, which includes so far over 5,400 entries.
- Received⁸⁸ 150 new applications by television stations for granting rights of use to television channels in new broadcasting locations. Moreover, 14 rights of use for television channels have been granted in response to the relevant applications, while 10 applications were

not processed or were rejected because granting the requested locations does not fall under the scope of the relevant Law. Lastly, 29 applications were rejected because they interfered with licensed television stations, with the Hellenic Broadcasting Corporation (ERT) or with a digital broadcasting television network.

- Sent to the Ministry of Infrastructures, Transport and Networks (MITN) 3 requests demanding more coordination with neighboring countries according to the provisions of the 2006 Geneva Agreement⁸⁹.
- Received 8 notification letters from network providers that transmit terrestrial digital broadcasting signals concerning 15 digital television channel transmissions based on the obligation⁹⁰ of national, regional or local television stations to submit to EETT, before starting digital transmission, the technical parameters of this transmission⁹¹ as well as specifications about the power and the antenna system that they use.

Radio-Television Spectrum Monitoring

As far as the monitoring of the radio-television spectrum is concerned, EETT exercises control by imposing the prescribed administrative sanctions on radio-television stations with regard to the following issues:

- Illegal (non-licensed) installation of relevant antenna systems⁹².
- Illegal use of frequency spectrum by legal radio-television stations, failure to comply with technical specifications for broadcasting, or creation of interference to other legal users⁹³.
- Use of fixed or mobile transmission links for radiotelevision station programs in non-allocated frequencies.

⁸⁴According to the provisions of article 9 of Law 3548/2007 "Inserting publications of Government agencies in the prefectural and local Press and other provisions".

⁸⁵According to the provisions of article 4 of Law 1866/1989.

⁸⁶Fulfilling the terms and conditions of article 17 of Law 2644/1998.

⁸⁷With the publication of joint Decisions by the Minister of Transport and Communications and the Minister who has been assigned the competences of the Minister for the Press and the Media.

⁸⁸In the context of the implementation of the "Regulation on granting Channel Rights of Use to national television stations holding a license of establishment and operation according to the provisions of article 17 of Law 2644/1998 and to local and regional television station fulfilling the terms and conditions of article 17 of Law 2644/1998 and the framework of their use pursuant to Law 3548/2007".

⁸⁹FINAL ACTS of the Regional Radiocommunication Conference for planning of the digital terrestrial broadcasting service in parts of Regions 1 and 3, in the frequency bands 174-230 MHz and 470-862 MHz (RRC-06).

⁹⁰According to Article 5 par. 2 of the Joint Decision 21161/12-8-2008 of the Minister of Transport and Communications and the Minister of State on the "Configuration of a Frequency Map for the Transition to terrestrial digital television broadcasting" (GG Issue 1680/B/2008).

⁹¹According to Article 4 par. 2 of Joint Decision 21161/12-8-2008 of the Minister of Transport and Communications and the Minister of State on the "Configuration of a Frequency Map for the Transition to terrestrial digital television broadcasting" (GG Issue 1680/B/2008).

⁹²Article 12 section 32 of Law 3431/2006 as amended by the provisions of Law 3534/2007 on "Establishing an Authority for allocating the available time of use in the Greek airports and other provisions", GG Issue 40/A/23-02-2007 and especially article 24 par. 2 and article 1 par. 5 section 3 of Law 2801/2000.

⁹³EETT Decision 479/075/09-05-2008 "EETT monitoring of spectrum use by radio-television stations" issued subsequent to the combined interpretation of the provisions of articles 1 par. 3, 4 par. 2, 11, 12 lines 18, 19, 20 of Law N.3431/2006 proportionally applied and of article 11 par. 3 line 3 and article 16 of Law N.3592/2007, "Merger and Licensing of Media Companies and other provisions", GG Issue 161/A/04-09-2007.



Within this framework, EETT processes the data that collects during inspections and sends an extrajudicial request for information/compliance to the infringing/interfering radio-television station. In the event that the latter fails to comply within the period specified by the law, EETT conducts a Hearing in order to resolve the issue. As a result of this procedure, EETT imposed numerous fines and recommendations on radio-television stations that had not complied with the existing legislation.

Given that the licensing of television and radio stations as well as the organization of antenna parks at the locations constituting transmission centers⁹⁴ are still pending, there have been numerous cases of illegal broadcasts, mutual interferences between television and radio stations as well as interferences to other spectrum services and uses. The organization of antenna parks, as specified in the legislative framework, is expected to improve the overall situation of the Greek radio-television landscape. In order to assist in terminating the operation of illegal broadcasts, EETT performs regular inspections and takes actions for the prompt resolution of problems relating to interferences, in collaboration with the competent police, judicial and administrative Authorities.

Complaints

In 2010, EETT received 1,436 documents and complaints regarding radio-television issues (269 about the Attica prefecture, 106 about the Thessaloniki prefecture, 1,048 about the remaining Region, 6 about the entire country and 7 about international interferences), which referred to interferences, illegal broadcasts and illegal radio-television station and antenna installations. These complaints as well as the ex officio inspections resulted in 865 new cases. More specifically, the cases related to:

- 432 radio station issues out of which 63 involved the Attica prefecture, 25 involved the Thessaloniki prefecture, 330 involved the remaining Region, 8 involved international interferences and 6 involved the entire country.
- 360 television station issues out of which 43 involved the Attica prefecture, 52 involved the Thessaloniki prefecture, 261 involved the remaining Region, 3 involved international interferences and 1 involved the entire country.
- 73 inspections of antennas and broadcasting centers out of which 21 were carried out in the Attica prefecture, 23 in the Thessaloniki prefecture and 29 in the rest of the country.

EETT investigated the majority of the above complaints. In certain cases, which required immediate inspection and

were related to problems in areas of the country that were quite remote from EETT's two monitoring offices, EETT requested the assistance of the respective Prefectural Authorities.

The results of the recordings were assessed on the basis of the legality lists and the technical data provided by the NCRTV and on the basis of the applicable law. Infringing stations were summoned to comply. Out of the investigated cases, EETT referred to administrative control:

- 45 radio station cases (3 in the Attica prefecture, 8 in the Thessaloniki prefecture and 34 in the rest of the country).
- 295 television station cases (13 in the Attica prefecture, 17 in the Thessaloniki prefecture and 265 in the rest of the country).
- 18 antenna installation cases (10 in the Attica prefecture and 8 in the rest of the country).

It must be noted that 42 of the above-mentioned cases concerned channels which had been demonstrably occupied by repeaters of legal television stations managed by Local Authorities.

In the cases of radio-television stations which, according to NCRTV's decisions, operated illegally, EETT informed in writing the competent public prosecutors and police Authorities for implementation of the prescribed criminal proceedings. In collaboration with the above Authorities, a number of operations were carried out in order to terminate illegal transmissions. During those operations, broadcasting equipment was confiscated from:

- 20 radio and 20 television stations, including a wireless camera, in the prefecture of Attica.
- 21 radio and 8 television stations in the rest of the country.

Recording of the Radio and Television Stations throughout the country.

In the absence of licensing, mapping the broadcasting centers throughout the country as well as the frequencies used by the radio and television stations is an important tool in the management and monitoring of the radio-television spectrum.

In 2010, teams of EETT technicians conducted a detailed mapping of the radio-television spectrum in 23 prefectures in total. The NCRTV, which is the competent Regulatory Authority for investigating the radio-television stations' legality of operation, was notified of the results. Based on the recorded findings, the number of privately-owned radio stations operating in each prefecture is on

⁹⁴The spatial planning of antenna parks does not fall under the competences of EETT.



average three to four times higher than the number of broadcasts stipulated in the Frequency Maps. As a result, there is an increased risk of harmful interferences to legal spectrum users, as well as a respective decrease in the provided service's quality.

In addition to the above-mentioned investigations, EETT continued updating the mapping of radio-television broadcast infrastructures in broadcasting centers throughout Greece. The purpose of this update was to update EETT and all competent bodies on the current conditions in the broadcasting centers of Athens and Thessaloniki, as well as in other major broadcasting centers, in order to enable them to deal more directly and efficiently with the problem of illegal transmissions. EETT, in collaboration with the Athens and Piraeus Prosecutor's Office and the State Security Division of the Hellenic Police, conducted a series of repeated inspections into the illegal radio-television broadcasting station infrastructures in the area of Pirovolia of Mount Egaleo, on Mount Pikilo, on Mount Hymettus and in the area of Tourkovounia. The result of these operations was the repeated termination of all illegal broadcasts, confiscation of the active equipment and dismantling of the antenna constructions. The Public Power Corporation (PPC) was notified of the inspections' findings so that it may suspend supplying power to all the facilities not owned by legal users.

With regard to the area under the competence of the Thessaloniki Regional Office, a detailed mapping of the broadcasting positions was carried out in the "Soros" broadcasting center of the Magnesia prefecture. The relevant inspections were performed in the context of the preliminary investigation conducted by the Volos Security Division subsequent to a prosecutor's order.

3.1.6. Air Navigation and Other Governmental Service Networks

The smooth operation of Wireless Networks that relate to the protection of human life and public and national safety is a top priority for EETT. The Government Networks of Emergency Services, of Transport Safety Services as well as the Armed Forces belong in this category.

More specifically, such networks include:

- The Emergency Networks of the Hellenic Police (ELAS), the Hellenic Fire Service (PY) and the National First Aid Service (EKAV).
- The Transport Safety Networks (air and sea navigation and railways).

Among governmental networks, the ones facing the most problems are the Civil Aviation Authority (CAA), since the air navigation spectrum (108-137 MHz) is contiguous

with the radio broadcast band (87.5 - 108 MHz). Most of the interferences that appear in those networks are due to lack of technical specifications regarding operation frequency and other important broadcasting parameters due to a gap in radio station licensing.

In 2010, interference problems were encountered in the following wireless systems of the CAA:

1. Area Control Service communication systems (telecommunication centers).
2. Airport communication systems.
3. Radio Aids.

EETT carried out 15 operations to deal with written complaints regarding interferences in the wireless systems of CAA. Out of these complaints, 12 regarded terrestrial communication receivers, two were related to radio aids and radar systems and one was related to a remote radio aid station interconnection with the Athens International Airport (AIA). EETT acted promptly and resolved all cases of interferences in terrestrial receivers and radio aids.

In 2010, EETT and CAA intensified their collaboration and prepared a memorandum of understanding, in an effort to combat interferences in a faster and more efficient manner. The memorandum is being drafted by the competent Directorates of the two Authorities and is expected to be completed in 2011. The purpose of the memorandum is the detailed mapping of the procedures and the standardization of the communication documents between CAA and EETT with a view to offering better information, clear technical recording of interference cases, proper coordination and, ultimately, more efficiency in resolving interference issues. It must be noted that CAA's interference problems are expected to decrease only after the licensing of the radio stations throughout the country has been implemented and, in turn, rules of town planning and control have been imposed over antenna installations at the broadcasting centers.

In 2010, 9 cases of interferences in the operating frequencies of the other governmental safety and emergency networks were referred to EETT, were examined in order of priority and were immediately resolved. More specifically, EETT received four complaints from the Ministry of Economy, Competitiveness and Shipping, one from the Hellenic Railways Organization (OSE), two from the Hellenic Air Force and two from the Hellenic Army.

With regard to interferences in systems relating to the protection of human life and public safety at the international level, two air-navigation-related complaints were submitted to EETT by the Regulatory Authority of Turkey.



3.1.7. Radio Amateurs

In 2010, EETT received 29 complaints over radio amateur interferences in communication systems and 11 requests for legality inspections into relevant antenna systems. In most of the above cases, EETT carried out technical inspections, promptly scheduled the actions necessary for resolving the problems and, where appropriate, implemented the procedures for imposing the prescribed sanctions. The majority of the problems investigated and resolved by EETT were caused by interference transmissions from electromechanical or electrical or electronic devices, radio networks and radio station broadcasting systems, as well as by illegal frequency use.

3.2. Antenna Mast Constructions

3.2.1. Evolution of the Licensing Process

Throughout 2010, 1,840 applications for new antenna mast constructions licensing and/or modification of already licensed constructions were submitted to EETT. Out of these cases, 420 antenna mast constructions were licensed and/or modified, 196 applications were rejected and 190 licenses were revoked for various reasons. The remaining applications were characterized as “pending”, because the submitted applications were incomplete or due to lack of Environmental Terms Approval (ETA).

Moreover, the antenna mast constructions already licenced by EETT or the MITN, must be adapted, within specified deadlines, to the environmental requirements and the new radiation limits for public safety, according to Law 3431/2006. To this end, 115 applications were submitted by the mobile telephony operators for confirmation of license validity and EETT issued 113 positive Decisions, while 2 applications were rejected.

3.2.2. Illegal Mobile Telephony Antenna Installations

In 2010, 1,461 complaints were submitted to EETT relating to mobile telephony antenna constructions. Out of these, 1,059 concerned areas under the competence of the Spectrum Monitoring and Control Division and 402 concerned areas under the competence of the Thessaloniki Regional Office.

After a thorough investigation, it was found that 908 cases related to licensed antennas and the complainants/ applicants were duly informed of those antennas’

legality. The remaining 553 cases concerned non-licensed constructions. Teams of EETT technicians conducted a total of 493 inspections at mobile telephony base stations, out of which 269 on-site inspections were performed in the Attica prefecture, 75 in the Thessaloniki prefecture and 149 in the rest of the country. In 38 of these cases, the inspections were carried out by the competent Prefectural Authorities. In the cases of non-licensed antenna constructions, for which on-site inspections had been performed, EETT launched the appropriate procedures for the imposition of administrative sanctions.

3.2.3. Conducting a Study on the Procedures of Licensing, Installing and Operating Antenna Mast Constructions

In 2010, EETT established a working team aiming at conducting a study and formulating proposals on the procedures of licensing, installing and operating antenna mast constructions. The project includes the following deliverables:

1. Providing a description of the current legal framework on licensing antenna mast constructions, statistical data concerning the licensing rate, other European Regulatory Authorities' practices and a summary of the problems that companies face in the implementation of the current framework.
2. Formulating proposals for the improvement of the current situation in relation to the licensing of antenna constructions on land. These proposals include, among other things, solutions for the simplification of the processing of applications and the resolution of the pending issues that have ensued, the utilization of new technologies with a view to minimizing the total time required for licensing, as well as mechanisms for better informing all stakeholders (providers, organizations, citizens).
3. Conducting studies on the development of mobile telephony networks based on reports submitted by the providers each semester and also simulations of mobile telephony networks in urban areas for studying the impact of network density on radiation levels, the quality of services and the network capacity.

The above results will be used by EETT for improving the procedures for licensing, installing and operating antenna mast constructions. After the submission of the relevant proposals to the stakeholders and the Government, the required changes are expected to be implemented.



3.3. Radio and Telecommunications Terminal Equipment

3.3.1. Update of Radio Interfaces

By virtue of a Decision⁹⁵, EETT published the updated technical characteristics (radio contacts) of all short range devices available in the Greek market. These include the technical characteristics of short range devices for radio local area networks (RLAN), alarms, remote controls, wireless microphones, implantable medical devices, etc. The Decision also includes a new category of short range devices which are used for probing the tank level (Tank Level Probing Radars - TLPRs).

Furthermore, by virtue of another Decision⁹⁶, EETT published the texts for 6 new radio contacts concerning Air Traffic Management (ATM) Equipment and Systems operating in the following frequency bands:

- 108-117.975 MHz
- 1300-1350 MHz, 2700-2900 MHz and 9000-9200 MHz
- 255-405 kHz, 415-495 kHz and 505-526.5 kHz
- 117.975-137.000 MHz
- 960-1215 MHz

3.3.2. Market Surveillance

EETT performs regular inspections of the Radio and Telecommunications Terminal Equipment (RTTE) market in order to protect consumers against illegal equipment and prevent potential harmful interferences. To this end, EETT monitors the compliance of the equipment in the Greek market with the requirements set by the Presidential Decree (PD) 44/2002.

In 2010, EETT conducted regular inspections into RTTE retailers and sample-tested a total of 102 items from an assortment of RTTE equipment (such as mobile phones, PMR, short range devices, wireless games). Sanctions were imposed to the companies in violation.

3.4. National Spectrum Management and Monitoring System

Monitoring Expansion in the Region

Taking into consideration the need to expand its activities throughout the Greek territory, in accordance with global practice and with a view to optimizing the services provided to the citizens, EETT issued Decisions⁹⁷ setting up two new Regional Offices in Patras and Heraklion, which are expected to begin their operation within 2011.

Apart from setting up Regional Offices, EETT plans to expand the National Spectrum Management and Monitoring System (NSMMS) in the rest of the country by installing and operating an extensive network of Permanent Monitoring Stations (PMS). To this end, the MITN issued a Decision⁹⁸ describing both the existing PMSs and the minimum technical requirements for installing new ones, mentioning various geographic areas as potential locations.

3.5. EETT's Controlling and Monitoring Actions

In 2010, EETT conducted 651 Hearings regarding violations in radiofrequency spectrum issues. As a result of these Hearings, 487 fines were imposed, while in 16 cases the defendants were exempted.

⁹⁵EETT Decision 565/047/20-05-2010, GG Issue 1040/B/7-6-2010.

⁹⁶EETT Decision 572/007/21-07-2010, GG Issue 1855/B/26-11-2010.

⁹⁷EETT Decisions 569/13/24-6-2010 and 569/14/24-6-2010, GG Issue 1405/B/6-9-2010.

⁹⁸Ministerial Decision no Ec.8165/D/280/F401 on the "Establishment of a National Radio Spectrum Monitoring System".

Table 3.1.
Results of EETT Hearings in the Radiofrequency Spectrum Sector, 2010

Subject	Number of Hearings	Exemption	Sanctions	
			Fine	Recommendation
Mobile Telephony Antennas	484	11	473	-
Other Antenna Constructions	11	2	1	8
Terminal Equipment	10	-	2	8
Use of Non-Assigned Radiofrequencies for the Operation of Radio Links	10	-	4	6
Monitoring of Radio and Television Stations	136	3	7	126
Total	651	16	487	148

3.6. Goals

EETT's objective regarding the radiofrequency spectrum is to ensure its optimal technical and financial management in order to maximize the benefits from its utilization. In order to meet this objective, EETT will focus in 2011 on the following specific goals:

- Faster response to the requests made by radiofrequency spectrum users through expansion/development of EETT's infrastructures and especially through (i) the operational expansion of supervision in the rest of the country and (ii) the development of an information

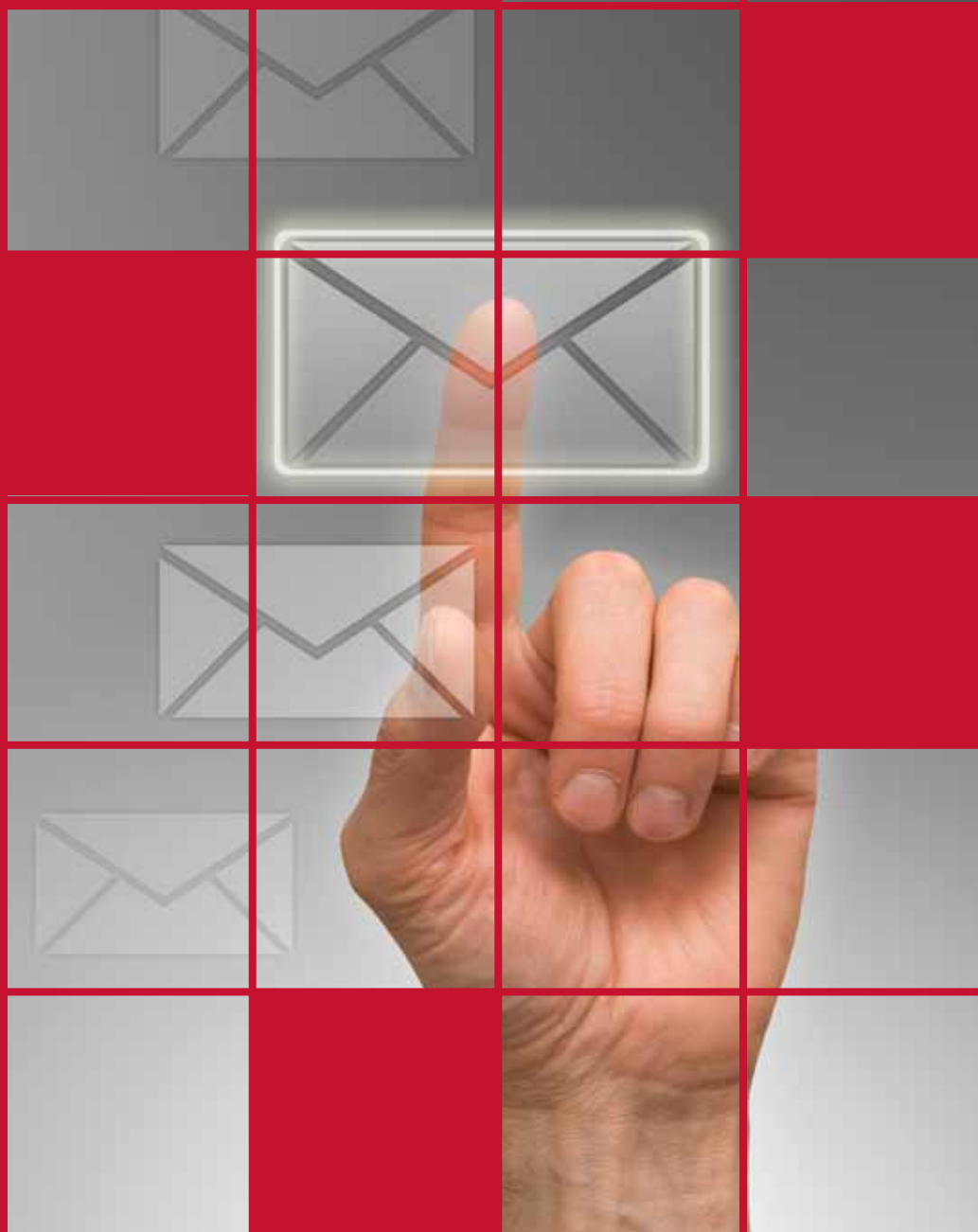
technology system for electronically submitting applications for frequency and antenna licensing.

- Ensuring the availability of the spectrum to a wide range of users and providers in order to convert it into a development tool, to accelerate the transition to digital television and to make it a dynamic resource for bridging the digital divide between center and periphery.
- Ensuring the proper use of the spectrum in order to minimize interferences for lawful users and to guarantee a high quality standard of services enjoyed by the citizens.



4

Postal Services Sector



In 2010, within its jurisdiction, EETT participated in elaborating the Draft Law concerning the Organization of the Postal Services Sector in view of the postal market's liberalization until December 31, 2012. Also, EETT actively participated in the European Regulators Group for Postal Services (ERGP), the European body established in 2010 comprising the Regulatory Authorities for Postal Services.

Furthermore, EETT took important initiatives related to ensuring the quality of the Universal Service (US) as well as implementing actions relevant to green growth and economy.

All the actions taken by EETT in the Postal Services sector in 2010 are analyzed in the following sections, based on 2 basic pillars:

1. Developing the postal market and protecting consumers.
2. Ensuring the quality of the US.

4.1. Development of the Postal Market and Consumer Protection

EETT's objective is to ensure the smooth operation of the postal market and the compliance of postal operators with the existing regulatory framework. To this end, EETT submitted proposals for improving the legislation, took actions for reliably and systematically informing consumers and companies and conducted regular inspections in the market.

4.1.1. Participation in Drawing up the Draft Law on the Organization of the Postal Services Sector

Given the need to revise the current legal framework on the postal market in Greece, EETT drew up and submitted to the Ministry of Infrastructures, Transport and Networks (MITN) a Draft Law and an explanatory report concerning the Organization of the Postal Services Sector and the incorporation of Directive 2008/6/EC⁹⁹. Furthermore, EETT participated in the Ministry's respective working group which has already completed its task. The proposed draft law aims at determining the mode of transition to fully liberalized conditions in the postal market until 31-12-2012, on the one hand, and ensuring high quality in the provision of the US in Greece, developing the national

postal market and improving quality to the benefit of the users, on the other.

EETT's proposals concerned, among other things, the gradual abolition of the reserved area until 31-12-2012, the simplification of licensing procedures for postal operators, the ability of selecting the way of assigning the US in part or in whole, the method of financing the US and the provisions for improving the efficiency of the Universal Service Provider (USP).

4.1.2. Ministerial Decision for Licensing Private Trucks

In 2010, due to the referral of our country to the European Court of Justice and following repeated interventions by EETT, a new Ministerial Decision¹⁰⁰ (MD) was issued lifting the current obstacles in the regulatory framework to licensing private trucks by Courier operators. More specifically, Courier operators who are members of a postal network will have the ability to license a private truck under 4 tons. For obtaining the license, they have to present an EETT document certifying that they are enlisted in the postal network of an operator holding a General Authorization. Moreover, no upper weight limit is mentioned in the MD for parcels transported by private trucks in this category.

⁹⁹Directive 2008/6/EC of the European Parliament and of the Council of 20th February 2008 on amending Directive 97/67/EC concerning the full implementation of the internal market of community Postal Services.

¹⁰⁰GG Issue 1664/B/19-10-2010, Amendment of Ministerial Decision no A2/29542/5347/1991 (GG Issue B'707/5-9-1991) on "Registering Private Trucks according to Law 1959/91".



4.1.3. Submitting Proposals to the MITN for the Regulation on the Pricing Principles of the Universal Service

EETT submitted proposals on the Regulation on the pricing principles of the Universal Service (US) of the USP aiming at determining an effective pricing system that will ensure the cost-orientation of prices so as to be affordable to consumers. This particular proposal was based on the experience obtained through assessing the tariffs of the Universal Postal Services and on the data submitted so far to EETT by the USP.

4.1.4. Draft Ministerial Decision for Consumer Compensation

With a view to protecting consumer rights and taking into consideration the current economic conditions of the domestic postal market, EETT drew up and submitted to the MITN a Draft on amending the MD¹⁰¹ concerning the obligation of paying compensation for deficient provision of Postal Services. The amendment of this MD aims at improving the prescribed compensations per service and was deemed necessary in order to:

- Determine compensations corresponding to the type of postal item (letter or parcel) and the extent of the damage (total or partial damage, loss or delay).
- Specify which postal operators must pay what kind of compensation for which services (General Authorization, Individual License and USP).

It is worth noting that the proposed amendments are based on the experience obtained by EETT through processing a great number of user complaints and studying the European practices and the provisions of the relevant Directives of the European Union (EU) as well as the Universal Postal Convention.

4.1.5. Annual Report on the Postal Market

As every year, EETT gathered in 2010 both quantitative and qualitative data from the postal operators enlisted in the Registry in order to better map the Greek postal market for 2009. The number of companies operating in the Greek postal market in 31-12-2009 amounted to 1,205, including operators who are members of networks licensed by EETT. In these companies around 21,000 persons were employed in 2009 under full or part time contracts.

The analysis of data and comparison with the preceding years showed that the financial crisis as well as the extensive use of electronic media affected the Greek postal market in 2009. Thus, compared to 2008, there was a fall of almost 6% in the volume of items handled in the postal market and a reduction by over 1% in the respective revenues. More specifically, total items handled in the postal market amounted to 728 mil. compared to 777 million in 2008, whereas total revenues reached 743 million euros compared to 753 million euros in 2008. Most of the items are handled domestically, while over 7% of the total number is directed to international destinations. It must be noted that the revenues from the handling of international items correspond to approximately 17% of the market's total revenues.

The forthcoming developments are expected to have a significant impact on the further growth of the Greek postal market. In this context, EETT is intensifying its efforts for better serving and protecting consumers.

¹⁰¹GG Issue 683/B/2-6-2000 "Determining the cases for paying lump-sum compensation for deficient provision of postal services".



Table 4.1.
Volume of Items in the Greek Postal Market

Postal Items	2005	2006	2007	2008	2009	Change 2009/08
Universal Service Sector	649,475,889	693,606,224	723,045,301	726,188,933	678,379,349	-6.6%
Universal Service Provider (USP)	649,475,889	686,782,500	716,220,900	718,858,100	671,668,468	-6.6%
Operators with Individual License	Not Available	6,823,724	6,824,401	7,330,833	6,710,881	-8.5%
Courier Sector	39,156,615	45,034,437	46,470,205	50,650,921	49,986,523	-1.3%
Total	688,632,504	738,640,661	769,515,506	776,839,854	728,365,872	-6.2%
Annual Change Rate (%)	2%	7.3%	4.2%	1%	-6.2%	

Source: EETT Study "The Greek Postal Market, data and market trends in the year 2009"

Table 4.2.
Revenues of the Greek Postal Market

Revenues in euros	2005	2006	2007	2008	2009	Change 2009/08
Universal Service Sector	387,581,925	419,088,016	435,581,237	453,139,150	451,179,897	-0.4%
Universal Service Provider (USP)	387,581,925	416,241,268	432,940,435	450,286,543	448,630,625	-0.4%
Operators with Individual License	Not Available	2,846,748	2,640,802	2,852,607	2,549,272	-10.6%
Courier Sector	243,013,704	263,270,069	281,310,098	299,431,578	291,907,160	-2.5%
Total	630,595,629	682,358,085	716,891,533	752,570,727	743,087,057	-1.3%
Annual Change Rate (%)	6%	8.2%	5.1%	5%	-1.3%	

Source: EETT Study "The Greek Postal Market, data and market trends in the year 2009"



4.1.6. Implementation of the GIS Application for Post Offices

EETT's Geographic Information System (GIS), which is available on its website, added an application for searching and locating post offices. Through this new application, users may search for nearest post offices and locate them in a detailed electronic map.

4.1.7. Electronic Submission of Applications for Postal Service Providers

With a view to developing the Postal Services market, limiting bureaucracy and responding directly to the requests of Postal Service providers, EETT implemented in June 2010 the possibility to electronically submit applications as well as the required supporting data/documents. This option is offered on EETT's website for the following cases:

- Declaration/application for the Provision of Postal Services.
- Modification of the Data contained in the Declaration/Application for the Provision of Postal Services.
- Cessation of operation.

Thanks to this application, postal operators gain time and avoid needlessly shuttling to and from EETT's offices in order to submit the required supporting documents. Also, this particular application is part of the "green" strategy of saving paper and reducing oil consumption, given that all the required documents/forms can be filled out and sent electronically.

4.1.8. Meetings with Representatives of the Market

EETT met with representatives of the postal market for exchanging views on issues of concern for the sector. The discussions focused, among other things, on the impact of the financial crisis in the market as well as on the problems companies face preventing them from operating in competitive terms. Also, they examined the prospects of developing the sector in view of the full liberalization of the postal market after January 1, 2013.

Furthermore, with a view to developing the market, EETT supported the demands of providers for facilitating their operation, by promoting them to third competent parties. For example, it brought to the attention of the MITN the

issues related to the registration of private trucks and the formation of a national strategy, while it brought to the attention of the Ministry of Finance the issues related to customs procedures.

4.2. Ensuring the Quality of the Universal Service

The second pillar of EETT's actions for Postal Services concerns the quality of the US which must be provided to all citizens -wherever they live- on a permanent basis, at an affordable price, with a transparent and uniform pricing policy and in a fixed quality.

4.2.1. Redefining the Quality Specifications and Terms of Provision of the Universal Service

By submitting a set of proposals and an official opinion to the MITN, EETT contributed significantly to updating the MD¹⁰² on redefining the quality specifications of the Universal Postal Service, with the addition of terms such as the following:

- The periodic process of evaluation of regions excluded from the regularity of US provision.
- The determination of the minimum number of points of access to the US.
- The determination of the requirements and obligations of both the USP and the users for the smooth provision of the US.
- The obligation of keeping and publishing on an annual basis the file of complaints of the USP.

Also, by means of the aforementioned MD, a new framework was established for measuring the quality of the US. In the new framework, the relevant study must be conducted jointly by the USP and EETT, according to the European standard EN 13850:2002.

4.2.2. Universal Service Quality Measurements 2010

Based on MD 58134/2275/2010, EETT entered into a contract for implementing jointly with ELTA the project of measuring quality for 2010. The MD specifies the quality target for the percentages of delivery of domestic first priority mail to the recipient within one working day (D+1) and within three working days (D+3) since the working day of submission (on condition that the mail is

¹⁰²MD 58134/2275/08-01-2010 (GG Issue 42/B/20-01-2010), "Determining the quality specifications and terms of provision of the Universal Postal Service".



submitted to ELTA access points until 12:00 pm). Also, with regard to incoming/outgoing first priority international mail, the measurements are conducted by International Post Corporation (IPC) and concern the percentages of delivery within three working days (D+3) and within five working days (D+5) since the working day of submission.

Domestic First Priority Mail

The Table 4.3. demonstrates the annual results of the measurements for the years 2008 – 2010 as well as the average delivery duration in working days since the working day of submission. The percentages indicate the quality of US provision by ELTA throughout the country.

Table 4.3.
Domestic First Priority Mail

Year	ELTA Obligation (H+1)	ELTA Results (H+1)	ELTA Obligation (H+3)	ELTA Results (H+3)	Average Delivery Duration (days)
2008		79.9%		98.2%	1.14
2009*	87%	81.5%	98%	98.2%	1.13
2010		87.7%		98.9%	1.03

(D+1): within one working day
(D+3): within three working days
(* ELTA is the source of the results for 2009. The data were retrieved from measurements conducted according to Standard EN 13850:02 and they do not include exceptions.

International First Priority Mail

The quality measurements for international first priority mail are carried out for all EU countries by the IPC. The total number of countries that participated in the IPC UNEX measurement in 2010 was 34.

With regard to the total results in 2010 for the 34 countries, we observe that:

- The delivery percentage is 91.7% within three working days and 97.6% within five working days. Both of these indicators exceed the targets set by the European Postal Directive for 85% and 97% respectively.
- The average delivery time is 2.3 days and it is improved by half a day compared to 1998 and by a whole day compared to 1994.

In Europe, mail delivery depends mainly on air transportation. Especially in 2010, due to the explosion of the Eyjafjallajokull volcano in Iceland and the spread of ash cloud, airports in many European cities were temporarily shut, resulting in the decline of total European

performance by 2 percentage points compared to 2009 for delivery within three working days (D+3) and by 1 percentage point for delivery within five working days (D+5).

The tables below present the following data for the year 2010:

- i) The delivery percentages of international first priority mail within three working days (D+3) and within five working days (D+5) since the working day of submission prescribed by MD 58134/2275/2010 that ELTA is obliged to achieve.
- ii) The delivery percentages achieved by ELTA for international first priority mail within three working days (D+3) and within five working days (D+5) since the working day of submission.
- iii) The average duration of delivery in working days since the working day of submission.



Table 4.4.
Percentages of Mail Delivery in "Zone A" Countries

Destination Country (from Greece)	Outgoing (H+3)		Outgoing (H+5)		Outgoing Average Delivery Days
	ELTA Obligation based on MD 58134/2275/2010 (in %)	ELTA Results 2010 (in %)	ELTA Obligation based on MD 58134/2275/2010 (in %)	ELTA Results 2010 (in %)	
Zone A*					
Austria	85.0%	95.4%	97.0%	99.3%	2.1
Belgium	85.0%	92.2%	97.0%	98.3%	2.2
Bulgaria	85.0%	81.3%	97.0%	100.0%	2.4
Cyprus	85.0%	89.6%	97.0%	98.3%	2.4
Czech Republic	85.0%	94.1%	97.0%	100.0%	2.2
Denmark	85.0%	86.4%	97.0%	97.8%	2.4
France	85.0%	91.1%	97.0%	96.9%	2.4
Germany	85.0%	91.2%	97.0%	96.4%	2.5
Hungary	85.0%	83.8%	97.0%	97.7%	2.6
Italy	85.0%	89.7%	97.0%	96.6%	2.5
Luxembourg	85.0%	88.0%	97.0%	99.6%	2.5
The Netherlands	85.0%	94.8%	97.0%	99.0%	2.1
Poland	85.0%	80.0%	97.0%	99.2%	2.9
Romania	85.0%	90.7%	97.0%	98.8%	2.3
Spain	85.0%	88.9%	97.0%	98.8%	2.4
Sweden	85.0%	84.3%	97.0%	98.0%	2.6
Switzerland	85.0%	96.8%	97.0%	99.6%	2.1
United Kingdom	85.0%	85.5%	97.0%	96.0%	2.5

D=Day of Posting

**Zone A: Countries with direct daily flights from Greece (all the European Union countries except those included in Zone B)*



Table 4.5.
Percentages of Mail Delivery in "Zone B" Countries

Destination Country (from Greece)	Outgoing (H+3)		Outgoing (H+5)		Outgoing Average Delivery Days
	ELTA Obligation based on MD 58134/2275/2010 (in %)	ELTA Results 2010 (in %)	ELTA Obligation based on MD 58134/2275/2010 (in %)	ELTA Results 2010 (in %)	
Zone B**					
Croatia	80.0%	58.1%	95.0%	95.3%	3.7
Estonia	80.0%	78.8%	95.0%	100.0%	2.6
Finland	80.0%	84.2%	95.0%	98.7%	2.6
Iceland	80.0%	73.5%	95.0%	97.4%	2.8
Ireland	80.0%	83.3%	95.0%	98.7%	2.6
Latvia	80.0%	75.5%	95.0%	90.6%	2.9
Lithuania	80.0%	74.5%	95.0%	96.1%	2.9
Malta	80.0%	84.9%	95.0%	100.0%	2.9
Norway	80.0%	74.4%	95.0%	97.5%	3.0
Portugal	80.0%	68.9%	95.0%	98.4%	3.0
Slovakia	80.0%	84.3%	95.0%	98.5%	2.5
Slovenia	80.0%	57.1%	95.0%	87.8%	3.8

D=Day of Posting Mail

***Zone B: Countries without direct daily flights from Greece (such as Portugal, Ireland, Norway, Finland, Iceland, etc.)*

4.2.3. Improvement of the Terms of Distribution in Problematic Areas and Predetermined Points

In the context of improving the US and following a series of Hearings and cooperation with ELTA, EETT determined the terms of provision of the US in post office boxes for the delivery of items requiring special handling (such as registered mail, parcels delivered at home) and for serving the needs of people with disabilities and seniors.

At the same time, EETT began collaborating with ELTA and the PETA business development company of the Central Association of Municipalities and Communities of Greece on issues of mapping and improving the road numbering in problematic areas, where delivery of postal items is difficult.

4.2.4. Adoption-Implementation of a New Cost Accounting Model for ELTA

In February 2010, EETT issued a Decision¹⁰³ approving ELTA's new cost accounting system which will be in force until the full liberalization of the US sector, i.e. until 31-12-2012. The USP invoices for all the individual services of the

US, as mentioned in the cost accounting system approved by EETT, must be uniform for the entire country and harmonized in terms of cost, they must not discriminate, fulfill the rules on publication and transparency and be provided in affordable prices for all users.

4.2.5. Market Research for the Universal Service

According to the 3rd Postal Directive (2008/6/EC), the postal market will be fully opened to competition until 31-12-2012. The full liberalization of the Postal Services market will result in the enforcement of competition and the provision of more reliable and quality services to the benefit of consumers. Until the liberalization, ELTA maintains the exclusive right to handle domestic first priority items whose weight does not exceed 50 grams (i.e., the majority of letters). This upper weight limit is not in force if the price is equal to/or exceeds 2.5 times the price of a 20 gram domestic first priority letter.

In the prospect of liberalizing the postal market and incorporating the European Directive into Greek law, EETT planned and initiated in 2010 the implementation of a market research study throughout Greece. The

¹⁰³EETT Decision 551/069/04-02-2010, "The Cost Accounting System of ELTA as the Universal Service Provider (USP)".



purpose of the study is to map the behavior, habits and level of satisfaction of both individual consumers and companies with regard to the services included in the US. Moreover, it was also deemed useful to record the opinion of local authorities (Municipalities) about the level of service for city residents by the USP.

EETT's objective is to safeguard the quality of the US in view of the liberalization and to improve the services provided. The results of the study are expected within the first quarter of 2011.

4.3. EETT's Controlling and Monitoring Actions

4.3.1. Inspections

In 2010, in the context of investigating complaints, EETT teams conducted 8 on-site inspections. In six cases, EETT summoned the companies to a Hearing for investigating whether they provide Postal Services without the requisite General Authorization or Individual License or whether they comply with the provisions of the Regulation on General Authorizations, in order to impose the relevant sanctions. It should be noted that most complaints were due to problems in the relevant market of domestic and international transports, which was closed until recently.

It is worth noting that during the years 2008-2009, EETT completed an ambitious program of more than 450 ex officio inspections, resulting in only small scale infringements.

4.3.2. Deletions

During 2010, 55 companies were deleted from EETT's Registry of postal operators. Out of these, 31 were deleted following ex officio inspections conducted by EETT because the data entered in their Declarations were not confirmed. The remaining 24 were deleted at their own request because they ceased their Courier operations.

In order to protect postal operator users and to ensure healthy competition in the postal market, EETT posted on its website a list with all the Courier operators that have been deleted from the Registry of Postal Operators.

4.3.3. Access to the Public Postal Network

EETT began investigating important issues concerning potential violations of the competitive framework by the USP such as: discriminating treatment of subsidiaries, unequal access to the Public Postal Network, special customs procedure, etc.

4.4. Goals

EETT's regulatory strategy and action plan for 2011 are structured around the following two action pillars:

A. Development of the Postal Market and Consumer Protection

- Implementing the new under publication postal law.

Based on the expected law on the liberalization of the postal market, EETT will publish new regulations on the operation of postal operators and will issue opinions on the new MDs.

- Monitoring actions.

During 2011, EETT will continue with the same intensity to conduct regular and ad-hoc inspections on companies engaged in postal operations in order to investigate the degree of their compliance with the regulatory framework and to protect consumers who use Postal Services.

- Investigating competition issues – regulating the access to the Public Postal Network.

In line with its monitoring competences, EETT will investigate whether the USP has engaged in violations of the competitive framework and whether equal access of all postal operators to the Public Postal Network needs to be regulated.

- Informing the market.

EETT will continue to inform consumers and businesses through publications, studies, the internet and conferences about their rights, the current developments and the statistical data of the market as well as the incentives offered to operators in order to take actions with regard to green development and economy.

- Expanding internet procedures.

In 2011, EETT will automate and simplify the existing procedures for electronically submitting applications/ declarations in order to make communication between EETT and the regulated operators more effective, "greener" and less bureaucratic.

B. Ensuring the Quality of the Universal Service

- Quality Control of the US.

EETT will conduct quality measurements of the US based on European standards and will evaluate the areas excluded from its standard quality.

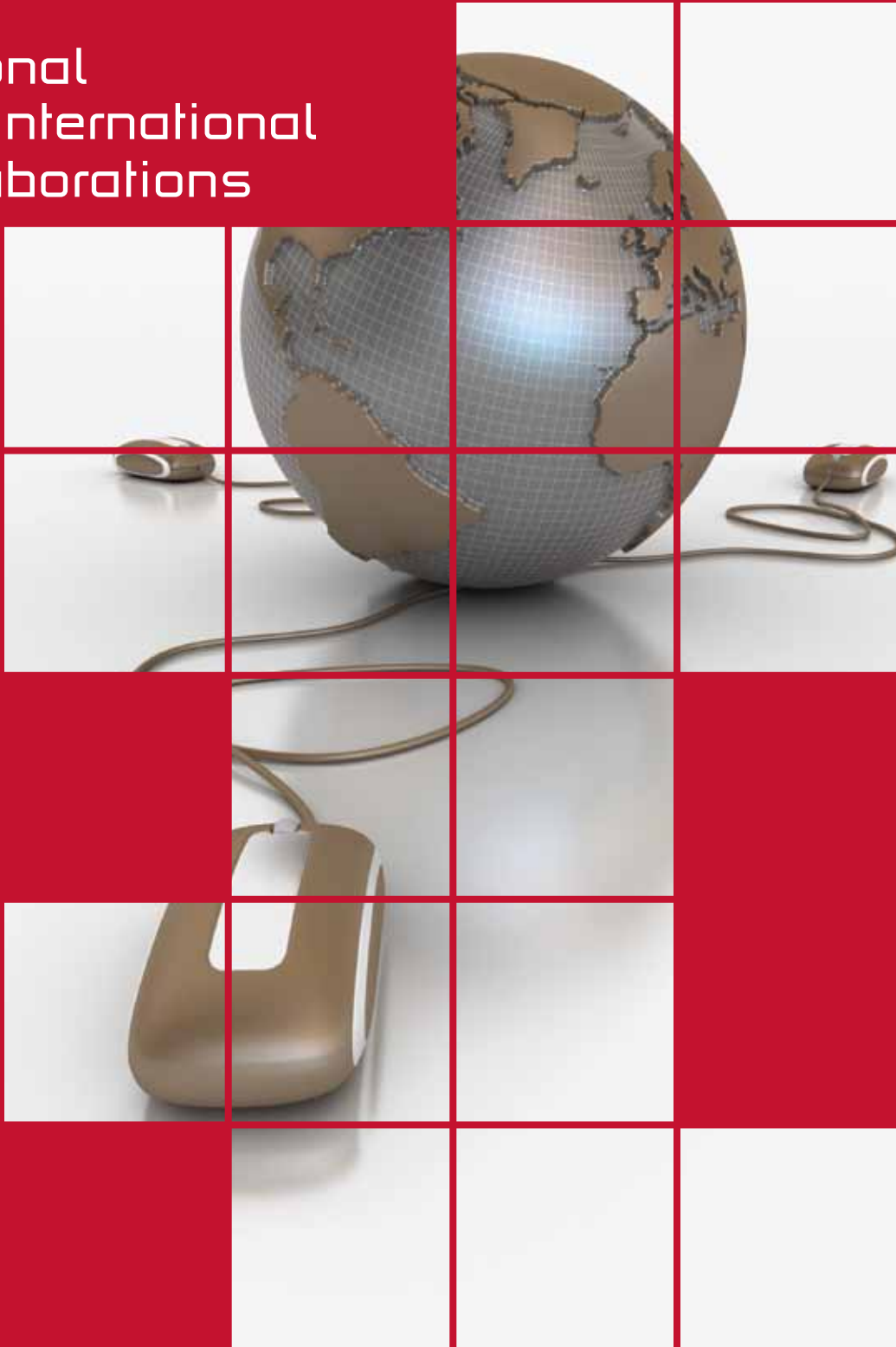
- Submitting proposals for the improvement of the US based on market research.

EETT will study the results of the extensive market research study to be completed in the beginning of 2011 and will formulate proposals for improving the US that are to be sent to the MITN, after being submitted for Public Consultation.



5

National and International Collaborations



Within its jurisdiction, EETT collaborates closely at national level with other Independent Authorities and public agencies. Moreover, EETT has developed a broad range of contacts beyond the Greek borders, aiming to continuously enhance its international presence and its active participation in the shaping of European developments.

EETT's consistent and systematic efforts were broadly recognized with its election at the Vice-Presidency of the Body of European Regulators of Electronic Communications (BEREC) in December 2010. This development brings EETT at the center of decision making at an exceptionally critical phase for the shaping of the European regulatory framework.

5.1. Collaborations at National Level

5.1.1. Hellenic Competition Commission

2010 was a year of fruitful collaboration between EETT and the Hellenic Competition Commission. The two Authorities coordinated their work to jointly deal with issues regarding the Electronic Communications market as well as the broadcasting services market, in order to ensure adherence to competition law and especially Laws 703/1977 and 3784/2009.

The sharing of documents between the two Authorities, the manner, in which the two Authorities notified each other on company acquisitions/mergers, as well as the meetings held between them, confirmed the high level of coordination between EETT and the Hellenic Competition Commission.

The collaboration between EETT and the Hellenic Competition Commission also extended to the European level, since both Authorities are active members of the European Competition Network (ECN) paying particular emphasis in the exchange of practices and experiences for the harmonized application of the European Competition Law.

5.1.2. Ministry of Citizen Protection

Guided by its commitment to ensure the security of Postal Services users and of the staff handling postal items, EETT's Postal Division collaborated with the Ministry of Citizen Protection, especially during the period November-December 2010, when a series of parcels containing explosive devices addressed mainly to foreign embassies in Greece, were identified.

In this framework, EETT sent a letter/recommendation to all the Courier operators enlisted in the registry of postal operators with regard to the terms of their reception of postal items. The above-mentioned letter included,

among other guidelines, an announcement by the Ministry of Citizen Protection describing the external features of postal bombs as well as other indications of suspect mail.

5.1.3. "Digital Greece 2020" Forum

The "Digital Greece 2020" Forum is a horizontal action based on the participation of active citizens from business, education, research and public administration. The Forum gives all interested parties the opportunity to shape policy proposals, addressing them to the central and local government, representative bodies, as well as the academic-research community regarding the initiatives that must be undertaken and the targets that must be set, in order to reach a vision of a Digital Greece within the year 2020. It is a permanent mechanism for consultation and formation of policy proposals concerning Information and Communication Technologies (ICTs) applicable in critical sectors that will shape Digital Greece in 2020.

The organizational structure of the Forum includes the following:

- The Organizing Committee, which supports the operations of the Forum in both technical and organizational terms.
- The Strategy Committee, whose main task is to provide strategic guidelines to the Forum and the Working Groups.
- The 7 Working Groups, which are responsible for drafting documents containing policy proposals on their thematic areas. The thematic subjects of the Working Groups follow the action areas of the Digital Agenda 2020 (Public Administration & Society – e-Entrepreneurship – Education, Research and Innovation – e-Inclusion & Digital Literacy – Trust & Security – Interoperability, Free Software/Open Source Software (FS/OSS), Open Content & Data – Next Generation Access Networks).



EETT as well as the Prime Minister's Office and several Ministries have put "Digital Greece 2020" under their auspices. In this framework, EETT hosts and operationally supports the activities of the Forum, while participating actively in the Organizing Committee and the working groups.

5.2. International Collaborations

5.2.1. Body of European Regulators of Electronic Communications

The Body of European Regulators of Electronic Communications (BEREC) is a European institution that was set up by Regulation 1211/2009 of the European Parliament and the Council of November 25, 2009, as a continuation of the European Regulators Group (ERG). Its objective is to promote the development of the Electronic Communications market in the European Union (EU) through the establishment of a common regulatory environment in the member states.

In 2010, EETT participated actively in BEREC's activities, which focused on three basic pillars:

- Further improving the harmonization of the internal market.
- Dealing with new challenges in the Electronic Communications market.
- Incorporating the modifications introduced by the revised European Regulatory Framework into the work of European Regulators.

In this context, EETT took part in several expert working groups that analyze issues in the work plan of BEREC, contributing to the formation of a common strategy for the single European market of Electronic Communications and acquiring new know-how to be utilized in its regulatory and supervisory work. More specifically, EETT participated in the following groups:

- Convergence and Economic Analysis
- International Roaming
- Benchmarking
- End user issues
- Next generation access networks
- Regulatory accounting
- Termination rates
- Net neutrality

At the end of 2010, EETT achieved a significant distinction. More specifically, in the 5th Plenary Meeting of BEREC, held in Bruges, Belgium, on December 2 and 3, 2010, EETT

President, Dr. Leonidas Kanellos, was elected Vice-Chair of BEREC for the year 2011. He was elected unanimously by the 27 Regulatory Authorities of the EU member states comprising the Body, as well as by the representatives of the European Commission. EETT's unanimous election in BEREC's Vice-Presidency and Management Committee is an effective recognition and a vote of confidence granted to the Greek Regulator by all its fellow regulators and the European Commission.

5.2.2. Independent Regulators Group

By means of its participation into the Independent Regulators Group (IRG), EETT continued in 2010 its liaison with the European fellow regulators in order to investigate the prospects for further development of the Electronic Communications single market.

It should be noted that as of 2008, IRG is a legal entity, based in Brussels. EETT is one of the 33 founding members that co-signed its memorandum of association and an active IRG participant. At present, 45 Regulatory Authorities of Europe's Electronic Communications markets are members of the IRG.

5.2.3. European Competition Network

In the course of 2010, EETT participated in the meetings of the European Competition Network (ECN) contributing to the exchange of information regarding the markets under its competence. More specifically, EETT participated in May in the "ECN Telecoms Sectoral Subgroup" and in October of the same year in the "Cartels Practice and Policy Subgroup". In the meeting of the first subgroup, EETT was briefed by all the other National Regulatory Authorities on the pending issues and the implementation of articles 101 and 102 of the Treaty on the Functioning of the EU in the Electronic Communications market. In the second subgroup, EETT was fully informed about the "Leniency Programs" adopted by the other Competition Authorities, as well as about the cooperation between Authorities for the joint examination of cases. In this perspective, EETT informed the European Commission that it adopted in 2010 a relevant "Leniency Program" for the Electronic Communications markets.

EETT offered also its know-how through the ECN intranet system, on issues related to the markets within its jurisdiction and to the imposition of fines in the case of violations. The broad exchange of practices between the National Authorities on issues of competition policy was again particularly fruitful this year and EETT is expected to submit its contribution to the ECN Newsletter.



5.2.4. European Mediterranean Regulators Group

EETT is a founding and active member of the European Mediterranean Regulators Group (EMERG). The Group's main goal is to develop an Electronic Communications market which, despite the country specific characteristics and the different degree of growth of each national market, will endorse the values of the European model of transparency ensuring the regulatory stability to the benefit of enterprises and consumers alike. At the same time, such an encompassing market will consolidate equal access of all citizens of the broader region to the Knowledge Society.

EMERG's Work Program for 2010 resulted from a process of comparative analysis of the regulatory practices in the member states which was completed in December 2009 and was approved in the Plenary in January 2010. The Work Program covers a variety of matters of high interest for the local markets, such as the development of fixed networks, next generation access networks, the independence of regulatory authorities, regulation through the market analysis process and the Universal Service (US).

5.2.5. European Regulators Group for Postal Services

Due to the liberalization of postal markets in Europe, close cooperation between National Regulators has become an imperative need. For this reason, the European Commission established in August 10, 2010, the European Regulators Group for Postal Services (ERGP), which met on December 1, 2010 for the first time.

EETT participates actively in ERGP aiming to obtain and transfer to the Greek postal market the know-how and best practices from countries that are already advanced in the process of liberalization.

The four important points that distinguish ERGP from any other European body for postal regulation are the following:

- Only the independent regulatory Authorities of each member state can participate in the Group.
- The participants are restricted only to the countries of the European Economic Area (EEA).
- The member states are represented at the highest level (Presidents of the Regulatory Authorities).
- A representative of the European Commission is present at the meetings.

According to its Work Program, in the years 2011-12 ERGP will focus mostly on the following issues:

- Cost accounting issues and price determination.
- Net cost of the Universal Service (US) obligation – VAT as a benefit/burden.
- End user satisfaction and monitoring of market outcomes.
- Cross-border issues (products and pricing/terminal dues).
- Regulating the access to the Public Postal Network.

In this framework, ERGP will serve as an advisory group of experts facilitating communication, coordination and cooperation between the independent Regulatory Authorities and between the Authorities and the Commission in order to meet the goals of postal reform in the EU.

In their first meeting, the Regulatory Authorities adopted two basic documents setting out the mode of operation of ERGP: (i) the Rules of Procedure, and (ii) the Work Program for 2011-2012. The Regulatory Authorities agreed that the multi-annual Work Program will have to be revised in the coming year and gave a commitment to work on regulatory issues, such as allocation of common costs, the net cost calculation of the US obligation with emphasis on the effects of VAT exemption, end user satisfaction and monitoring of market outcomes, cross-border products and the treatment of consolidators.

5.2.6. Universal Postal Union

EETT participated in the Universal Postal Union's (UPU) Strategy Conference in Nairobi in September 2010, which focused on the shaping of the future strategy of the postal sector in a rapidly changing global environment.

The Conference included discussion and analysis of issues such as the following:

- UPU's effectiveness in the midst of the global financial crisis.
- The impact of Postal Services on the environment and the actions to be taken for a more "green" environment.
- The regional implementation of the "Nairobi Postal Strategy".
- New technologies and the change of consumer behavior in the Postal Services.
- Differentiation through the expansion of the Postal Services.
- Financial services through the post office and their added value for consumers.



Also, EETT took part in the UPU Forum in Bern, in November 2010, on “The Role of Regulation in an age of electronic substitution and liberalization”. The Forum included discussion and analysis of several critical issues for Postal Services relevant to:

- The US in the liberalized postal markets.
- Developing the postal market while reducing the environmental damage.
- The cooperation between the US Providers and the Courier Providers in a fully liberalized postal market.

5.2.7. Postal Directive Committee

In June 2010, EETT participated in a meeting of the Postal Directive Committee (PDC) in Brussels in the context of the regular meetings organized by the European Commission for preparing the implementation of the new Postal Directive. In the meeting there was a brief presentation of the operation of cross-border mail services and emphasis was placed on the dues imposed and their method of calculation, as specified in the existing legislative framework. There was special reference to article 13 of the Postal Directive that promotes transparency and cost-orientation in the method of calculating dues. Also, there was extensive reference to UPU’s article 26 and especially to the challenges facing the global cross-border postal market and its areas of growth and improvement. Furthermore, the emerging challenges due to the gradual liberalization of the postal markets and the growth of the handled volume of cross-border parcels due to the rise of electronic commerce were analyzed in the meeting.

Also, EETT participated in the PDC Plenary meeting organized by the European Commission in December 2010. The basic issues discussed related to the following areas:

- Organizing Public Calls for Tenders on the provision of Postal Services.
- Implementation of VAT.
- International developments.

5.2.8. Comité Européen de Réglementation Postale

In May 2010, EETT participated in the meeting of the members of the European Committee for Postal Regulation (CERP) in Krakow. The work of the project teams was presented, focusing on the following fields:

- Cost accounting and price regulation.
- Financial issues relevant to the US.

- Consumer issues relevant to the Postal Services.
- Supervision of the postal market.
- Regulatory policy.

Among the important issues discussed in the meeting was the reorganization of CERP, the latest developments in UPU, European regulatory issues and the future of Postal Services due to the growth of the internet.

Also, EETT participated in the 43rd Plenary meeting of CERP that was held in Istanbul in November 2010. The main topic of the conference was the reorganization of CERP in view of the establishment of the ERGP. In this perspective, a novel proposal was made about the new structure of CERP and the new Working Groups. Also, there was a presentation about the organization and operation of the Com-ITU Group of the European Conference of Postal and Telecommunications Administrations (CEPT) which could become the model for the organization of CERP. Moreover, there was an open discussion on the measures required for ensuring the access of private operators to various elements in the public postal network.

CERP’s activities will focus on policy issues, due to the participation of representatives from the Ministries, as well as on international relations issues mainly with regard to the UPU. The aim is, among other things, to effectively promote the European positions.

5.2.9. Other Official Committees

In 2010, EETT participated in the operations of the following EU Committees and Groups, contributing in the shaping of European developments:

- Forum of European Supervisory Authorities for Electronic Signatures (FESA): The purpose of the forum is the collaboration between the competent bodies, the exchange of views, and the development of common positions on issues arising from the implementation of Electronic Signatures.
- Working Group Frequency Management (WGFM): This is a working group of the Electronic Communications Committee (ECC) responsible for frequency management at the level of CEPT members. WGFM issues special regulatory provisions (decisions, recommendations and reports) on all matters regarding frequency management, such as fixed, mobile and satellite services, broadband services, short-range devices, ultra-wideband devices and new technologies for the use of radiofrequencies.
- Radio Spectrum Committee (RSC): It was formed pursuant a European Commission Decision in order to



determine harmonized conditions for the availability and effective use of the radio spectrum. These conditions are indispensable in establishing and operating the internal market in community policy sectors such as Electronic Communications, Transport and Research and Development.

- Participation in the joint one-day conference of RSPG-BEREC: In November 2010, the Radio Spectrum Policy Groups (RSPG) and the Body of European Regulators of Electronic Communications (BEREC) organized a joint one-day conference, with the participation of EETT. The aim of the conference was to facilitate the exchange of views between the National Regulatory Authorities regarding the impact of the proposed Radio Spectrum Policy Program (RSPG) on the main sectors relevant to RSPG and BEREC and especially on the effective use of the radio spectrum, market development and competition.
- Telecommunications Conformity Assessment and Market Surveillance Committee (TCAM): It was established in order to assist the European Commission and deliver opinions on issues relating to the implementation of Directive 1999/5/EC on Radio and Telecommunications Terminal Equipment (RTTE) and, where appropriate, publish guidelines on particular issues.
- Administrative Cooperation Group (ADCO): Its main responsibility is to support actions towards a common approach to the problems involved in monitoring the RTTE market.

Also, EETT participated in the following events relevant to postal issues:

- WIK (Wissenschaftliches Institut für Kommunikationsdienste): WIK holds international conferences specialized on postal issues every 18 months. The main themes of the conference held in February 2010 were the regulation of the US and its net cost, cross-border mail analysis and the implementation of the third Postal Directive. EETT was invited and made a presentation in the first session of the conference.
- Marketforce: EETT participated in the 13th Annual Conference of Marketforce and of the Institute of Economic Affairs on "Transforming and modernizing posts: insights from Europe's industry leaders" that was held in March 2010 in Brussels. The main thematic sections included the following:
 - Factors shaping the European postal sector.
 - Redefining the business models for the future – development strategies.
 - Creating effective and modern networks.
 - Developing competitive postal markets and

entrepreneurship (with case studies).

- Establishing and developing a powerful position in the market for success in the future.
- Postexpo: EETT participated in this global exposition of new Postal Services-related technologies which is the launching pad for innovative technologies and new ideas in the Postal Services sector. In the context of the exhibition, the challenges facing the sector due to its liberalization and especially due to Electronic Communications were discussed. Also, proposals were made on the adaptation and development of post offices in a digital world.
- Euromed: In the framework of the Euromed conference held in Beirut on June 8 and 9, EETT made a presentation on "Quality specifications and Regulation Issues for the Universal Service in Greece". The Euromed institution is an initiative in progress aiming at the collaboration of the Mediterranean countries in Postal Services issues and the improvement of their quality.

5.3. Goals

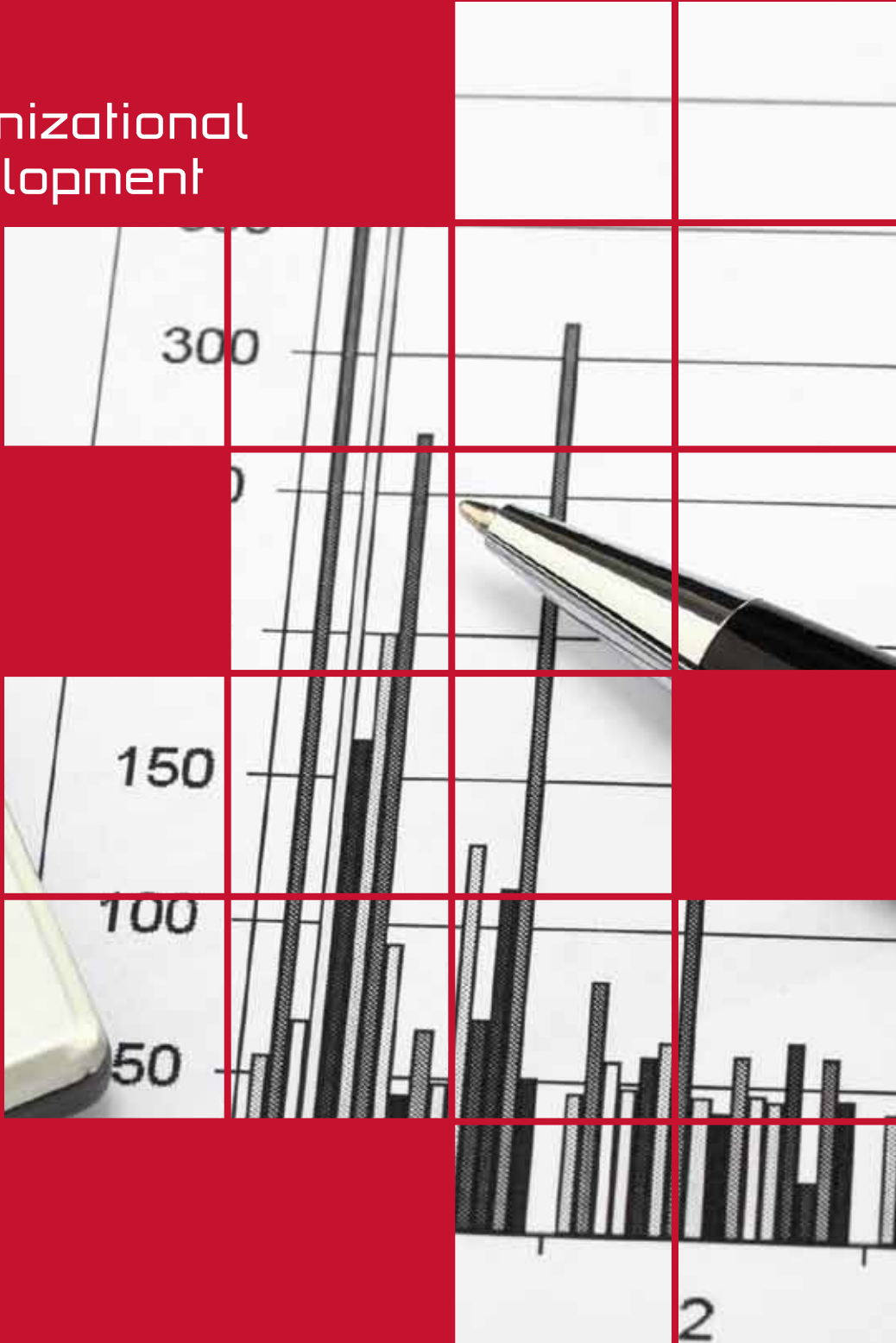
The following goals have been set in the field of collaborations:

- Close and constructive cooperation of EETT with bodies, public and private alike, in matters relating to EETT's responsibilities.
- Provision of the necessary assistance to the Government, in order to ensure the efficient representation of the country in European and international organizations.
- Constant cooperation of EETT with the European Commission and international organizations.
- Promotion of EETT as an important player in shaping a common European Regulatory Strategy in the electronic communications sector through its active participation in BEREC, IRG, EMERG and other international organizations relevant to its field of competence.
- Ensuring that the decisions, recommendations, common positions etc. formulated by the European Commission, BEREC or other international bodies in which EETT participates, take into consideration the needs and conditions, which are prevalent in the Greek market, and function in a way that contributes to the development and smooth operation of the market.
- Supporting the demands of the operators of the Postal Services sector addressed to other competent bodies beyond the strict limits of EETT's competences.
- Contributing to shaping the development of the Postal Services sector through participating in the committees of ERGP, CERP and PDC.



6

EETT: Organizational Development



EETT is an Independent Administrative Authority enjoying administrative and financial independence. Its main role consists of regulating, monitoring, and supervising the Electronic Communications networks and services market as well as the Postal Services market in Greece. EETT's goal is, on the one hand, to ensure the two markets' smooth operation in a competitive environment and, on the other, to protect consumer rights.

6.1. Internal Organization

6.1.1. Organizational Structure

EETT comprises:

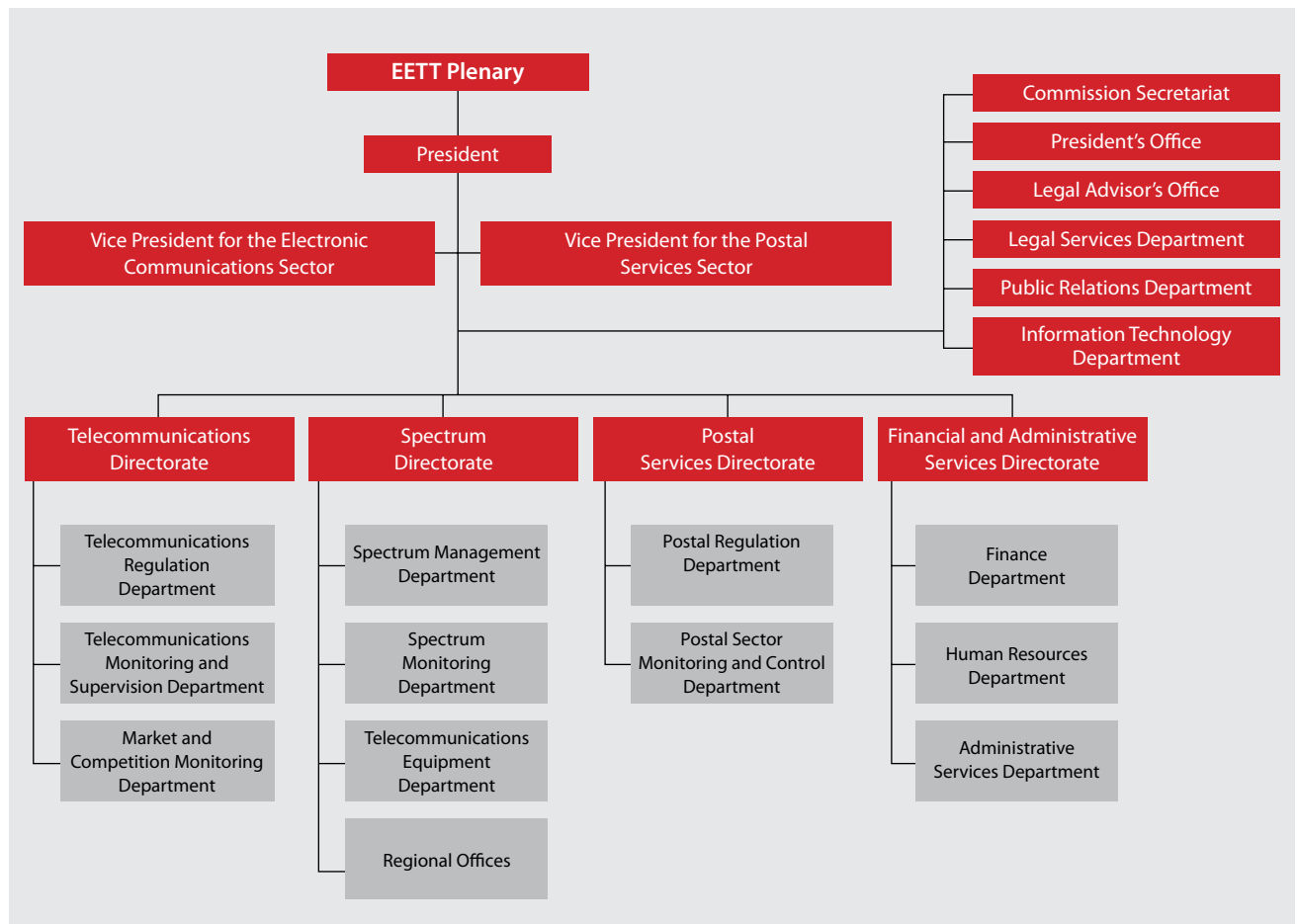
- The nine-member Plenary, consisting of the President, the Vice-President for Electronic Communications, the Vice-President for Postal Services and six more members. The President and the Vice-President are selected and appointed by the Council of Ministers following a

proposal by the Minister of Infrastructures, Transport and Networks and an opinion issued by the Special Permanent Parliamentary Commission for Institutions and Transparency. The rest of the EETT members are appointed by the Minister of Infrastructures, Transport and Networks.

- The Scientific Experts
- The Permanent Staff

EETT's organizational structure is presented in detail in Chart 6.1.

Chart 6.1.
EETT's Organizational Chart



6.1.2. Human Resources

At the end of 2010, EETT's staff comprised 224 employees compared to 228 at the end of 2009. Out of the above employees, 204 were engaged on a permanent basis (i.e., they held a statutory post), while 17 were external associates – members of working groups. Moreover, three policemen were seconded to the Spectrum Monitoring Department. In 2010, the number of EETT employees grew considerably due to the recruitment of staff coming from companies of the former Olympic Airways. These were 27 employees in total, mostly high school graduates working as Administrative Secretaries, hired by EETT with open-ended contracts under private law. Their recruitment allowed EETT to significantly

reduce the number of external associates–members of working groups employed by the Regulatory Authority for meeting the needs of its service.

In 2010, EETT announced 14 positions for Heads of administrative units in accordance with the provisions of P.D. 387/2002. The Heads serve three-year terms. It is estimated that the Tender will be completed within the first semester of 2011 and the selected new Heads will assume their duties following the relevant EETT Decisions. The evolution of EETT's human resources is presented in Chart 6.2. The number of employees engaged per category of staff is shown in Table 6.1.

Chart 6.3 depicts the educational level of EETT's staff.

Chart 6.2.
Evolution of EETT's Human Resources, 2001-2010

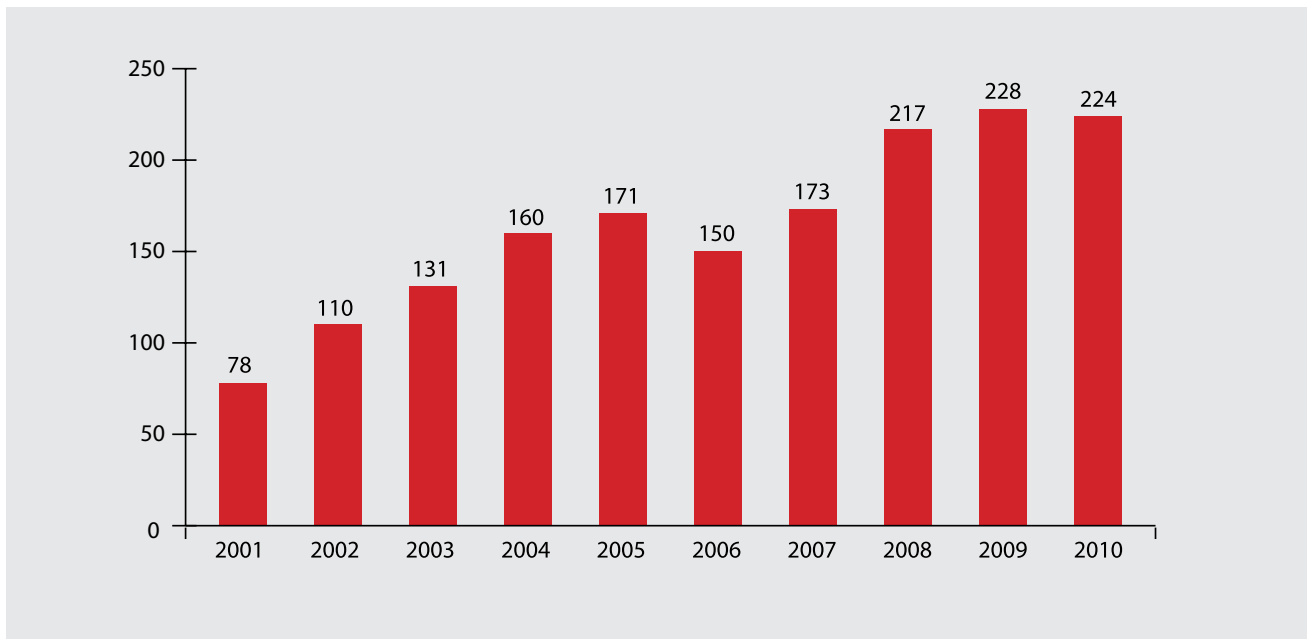
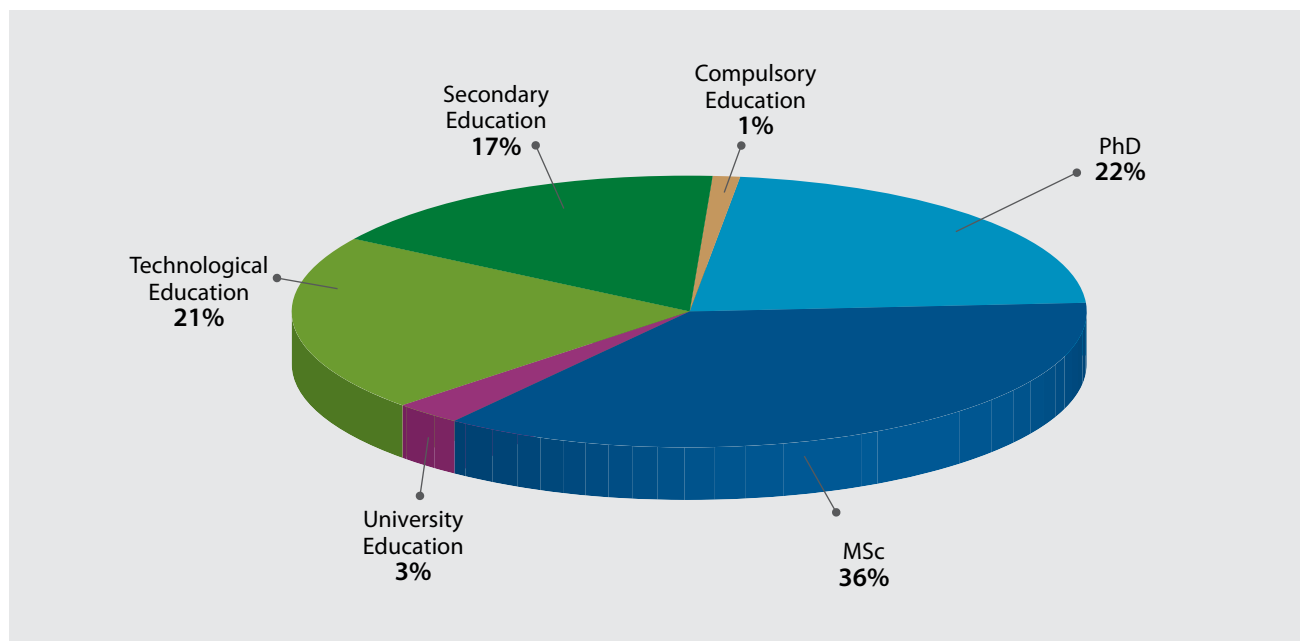


Table 6.1.
Employee Distribution per Staff Category 2002-2010

Staff Category	31/12 2002	31/12 2003	31/12 2004	31/12 2005	31/12 2006	31/12 2007	31/12 2008	31/12 2009	31/12 2010
Scientific Experts	56	69	64	70	69	85	83	99	106
Permanent Staff (Open-ended contracts governed by Public and Private Law)	35	42	42	60	63	65	66	63	98
Seconded Staff	0	0	0	3	3	3	3	3	3
Temporary Staff	0	0	34	0	0	0	0	0	0
External Associates (Working Groups' Members)	19	20	20	38	15	20	65	63	17
Total	110	131	160	171	150	173	217	228	224

Chart 6.3.
Educational Level of EETT Staff



6.1.3. Training Program for EETT's Employees

In the context of constantly informing and training its employees in matters relating to their job specialization and tasks, EETT supports a wide range of educational schemes including training seminars, participation in fora and international conferences, etc.

Throughout 2010, EETT executives participated in international conferences and training seminars relating to their operational tasks in order to become familiar with the developments in the Electronic Communications and the Postal Services markets. The total cost for education in 2010 amounted to approximately 20,000 euros.

Due to the considerable increase of EETT's permanent staff, a new introductory training and specialization program is being planned for the new employees in the coming months.

6.1.4. Employee Care

Provision of Health and Safety Services

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

EETT takes all the necessary steps in order to improve working conditions in accordance with the safety inspector's recommendations and in cooperation with the Occupational Health and Safety Committee which comprises representatives of the employees.

Moreover, all employees are regularly informed by the safety inspector and the occupational doctor on individual precautions they must take while working.

Free ADSL Connection

Since 2006, EETT offers free ADSL connections to the homes of all its employees. In this way, employees become familiar with modern methods of internet access and enjoy all the benefits that broadband internet entails in matters of research, information and communication. All EETT employees enjoy high quality and speed connections.

6.2. Website

In 2010, EETT continued to upgrade its website enriching its content and adding new interactive services.

With a view to increasing transparency and ensuring broader publicity for its actions, EETT added, in the beginning of this year, two new sections, the "Plenary Agendas" and the "Plenary Decisions". In the first section, the items in the agenda of the Plenary meetings are posted in advance. In the second section, the Decisions of the Plenary are published, sorted out in the following categories: Regulatory Acts, Hearing Acts, Numbering Resources Acts, Administrative Issues, Consultations, Antennas, Companies under General Authorization removed from the Postal Services Registry and Other Decisions. For posting the Decisions relating to antennas, EETT created a special web application which provides the relevant data per Region through the antenna licensing registry kept by EETT.

Recognizing the need for comprehensive and reliable information for both specialists and the general public on the potential effects of mobile communications systems on health, EETT added to its website the section "Antennas and Electromagnetic Radiation". Its content is drawn from a study conducted in cooperation with the Biomedical Simulations and Imaging Laboratory of the National Technical University of Athens. The section includes, among other things, dynamic webpages with comparative data on the Specific Absorption Rate (SAR), which is the rate at which the tissues of the human body absorb the radiofrequency radiation of mobile telephony devices that are available in the Greek market.

In the context of implementing Law 3783/2009¹⁰⁴ and for better informing the public, EETT, as the competent Authority for monitoring the identification process of pre-paid telephony subscribers, created on its website the section "Identification of holders and users of pre-paid cards" which includes detailed guidelines addressed to subscribers as well as clarifications addressed to mobile telephony providers.

Moreover, EETT offered to Electronic Communications and Postal Services subscribers the possibility to electronically submit their applications on its website (see Picture 6.1). These applications concern licensing for the provision of Electronic Communications or Postal services, number assignment, the publication of domain name registrars, the certification of electronic signatures and the authorization of Inmarsat Points of Service Activation (PSAs). In this way, EETT aims at improving its response time to the requests of both those who are already enlisted in its registries of operators/natural persons and of those who desire to operate in the markets under its responsibility.

In 2010, EETT expanded its Geographic Information System (GIS), incorporated into its website since the preceding year, and enriched it with further data. EETT

¹⁰⁴"Identification of holders and users of mobile telephony equipment and services and other provisions", GG Issue 136/A/07-08-2009.



introduced information on postal services, so that the user can type an address and learn about the post offices located within a radius of 50 kilometers.

In addition, EETT utilized its website in order to advertise the events that it organized during the year. In April 2010, it posted an advertising banner for the one-day conference “The future of the postal market: Regulatory Challenges and Tools for Development”. In June 2010, it reserved a special area in its website dedicated to its 5th International Conference on “Next Generation Access Networks: Unleashing the Potential for the Citizen and the Economy” (see Picture 6.2.), from where it broadcasted online the two-day event.

As of November 1st, 2010, EETT was included in the “CLARITY” program (DIAVGEIA) for implementing Law 3861/2010¹⁰⁵, which introduces the obligation of posting online the laws, the regulatory acts and the other acts of governmental and administrative bodies, with a view to achieving the widest possible publicity for government policy and administrative action.

In the context of that program, EETT has been posting, without delay, all its acts specified in the above-mentioned Law on a special website created for this purpose at the following address: <http://sites.diavgeia.gov.gr/EETT> (see Picture 6.3.).

Picture 6.1.

Electronic Submission of Applications for Providers



Picture 6.2.

Webpage for the 5th EETT International Conference



¹⁰⁵“Increasing transparency through the mandatory posting of laws and acts by the central and local administration on the on-line “Diavgeia (Clarity) Program” and other provisions”, GG Issue 112/A/13-7-2010.

Picture 6.3.

EETT Website for the "CLARITY" Program (DIAVGEIA)

The screenshot shows the EETT website interface. At the top left is the EETT logo and name: ΕΘΝΙΚΗ ΕΠΙΤΡΟΠΗ ΤΗΛΕΠΙΚΟΙΝΩΝΙΩΝ & ΤΑΧΥΔΡΟΜΕΙΩΝ (ΕΕΤΤ) with the tagline 'Ανάρτηση Αποφάσεων & Διοικητικών Πράξεων'. To the right is the 'Διαύγεια' logo with the tagline 'διαφάνεια στο κράτος' and the text 'ΕΘΝΙΚΟ ΤΥΠΟΓΡΑΦΕΙΟ'. Below the logos is a search bar labeled 'Αναζήτηση:' and a link for '[Σύνθετη Αναζήτηση]'. The main content area is titled 'Τελευταίες Αποφάσεις' and includes an RSS feed icon. Two decision entries are visible, each with a summary, date, AΔΑ number, and type of decision.

ΕΘΝΙΚΗ ΕΠΙΤΡΟΠΗ ΤΗΛΕΠΙΚΟΙΝΩΝΙΩΝ & ΤΑΧΥΔΡΟΜΕΙΩΝ (ΕΕΤΤ)
Ανάρτηση Αποφάσεων & Διοικητικών Πράξεων

ΕΘΝΙΚΟ ΤΥΠΟΓΡΑΦΕΙΟ **Διαύγεια** διαφάνεια στο κράτος

Αναζήτηση: [\[Σύνθετη Αναζήτηση\]](#)

Τελευταίες Αποφάσεις [RSS](#)

Προσωρινά μέτρα σύμφωνα με το άρθρο 7 παρ. 6 της Οδηγίας Πλαίσιο και το άρθρο 16 παρ. 5 του Ν. 3431/2006 αναφορικά με την παροχή υπηρεσιών χονδρικής ευρυζωνικής πρόσβασης από τον ΟΤΕ μέσω δικτύου πρόσβασης στο οποίο έχει εγκατασταθεί και λειτουργεί οπτική ίνα μέχρι τον υπαίθριο καταναμητή (FTTN/VDSL)

Ημερομηνία: **20/04/2011 08:51:30** ΑΔΑ: **4ΑΓΤ639-Δ** Είδος: **ΛΟΙΠΕΣ ΚΑΝΟΝΙΣΤΙΚΕΣ ΠΡΑΞΕΙΣ** Λήψη Αρχείου

Ορισμός των εθνικών αγορών λιανικής των δημοσίων διαθέσιμων τηλεφωνικών υπηρεσιών που παρέχονται σε σταθερή θέση, καθορισμός επιχειρήσεων με σημαντική ισχύ στις εν λόγω αγορές και υποχρεώσεις αυτών (2ος Γύρος Ανάλυσης)

Ημερομηνία: **20/04/2011 08:47:47** ΑΔΑ: **4ΑΓΤ639-Α** Είδος: **ΛΟΙΠΕΣ ΚΑΝΟΝΙΣΤΙΚΕΣ ΠΡΑΞΕΙΣ** Λήψη Αρχείου

6.3. Videoconference Systems



Taking advantage of the possibilities offered by technology, EETT has adopted videoconference applications at the systems and services level. Videoconference systems have been installed in EETT's Plenary meeting room and in the conference room. Long-distance conferences and meetings have already taken place. There was even a videoconference that

combined an autonomous system and a personal computer solution through the use of the H.323 protocol, which is an internationally recognized and popular protocol for multimedia communication with a broad base of users, software and videoconference stations.

Videoconferencing over the Internet was implemented during EETT's 5th International Conference and allowed a long-distance presentation from a speaker in Sweden.



6.4. Financial Data

 HELLENIC TELECOMMUNICATIONS & POST COMMISSION BALANCE SHEET AS OF 31 st DECEMBER 2010 - 16 th FISCAL YEAR (1 st JANUARY-31 st DECEMBER 2010, AMOUNTS IN EUROS)						
ASSETS			CAPITAL & LIABILITIES			
B. ESTABLISHMENT EXPENSES			A. OWNER'S EQUITY			
Amounts for the period ended 2010			Amounts for the period ended 2009			
Acquisition Value	Depreciations	Net value	Acquisition Value	Depreciations	Net value	
B. ESTABLISHMENT EXPENSES 1. Formation and set-up expenses 465,538.60 465,538.57 0.03 465,538.60 465,538.57 0.03 4. Other establishing expenses (Computer software) 2,634,674.81 2,594,068.93 40,605.88 2,616,261.74 2,580,414.92 35,846.82 3,100,213.41 3,059,607.50 40,605.91 3,081,800.34 3,045,953.49 35,846.85			IV. Reserves 2. Extraordinary reserves 293,470.29 293,470.29 3. Special reserves 15,430.67 15,430.67 Former EET's capital equipment 13,893,902.40 21,005,504.10 Reserve under art, 60 of Law 3431/2006 14,202,803.36 21,314,405.06 14,202,803.36 21,314,405.06			
C. FIXED ASSETS II. Tangible assets 5. Transport equipment 99,303.76 78,623.07 20,680.69 176,424.05 168,914.76 7,509.29 6. Furniture and other equipment 12,737,637.77 11,738,158.35 999,479.42 13,165,826.41 11,893,946.72 1,271,879.69 12,836,941.53 11,816,781.42 1,020,160.11 13,342,250.46 12,062,861.48 1,279,388.98			V. Results carried forward Profit carried forward 124,314,347.38 138,453,554.36 124,314,347.38 138,453,554.36 Total owner's equity (AIII+AV+AV) 138,517,150.74 159,767,959.42			
III. Participations and other long-term financial assets 7. Other long-term claims 97,916.00 237,007.94 97,916.00 237,007.94 Total fixed assets (C II + C III) 1,118,076.11 1,516,396.92			B. PROVISIONS FOR CONTINGENCIES AND EXPENSES 1. Provision for personnel redundancy and retirement compensation 275,398.16 500,162.62 2. Other provisions 17,920,000.00 3,728,663.26 18,195,398.16 4,228,825.88			
D. CURRENT ASSETS I. Stocks 4. Fixed asset spare parts 257,625.28 213,086.62			C. LIABILITIES II. Short-term liabilities 1. Suppliers 751,899.26 805,866.64 4. Advances from customers 1,753,499.59 2,724,152.46 5. Tax and duties payable 164,449.69 378,712.57 6. Insurance and pension fund dues 204,948.07 317,894.66 11. Sundry creditors 23,166,902.45 22,814,184.52 26,041,699.06 27,040,810.85			
II. Debtors 1. Customers 5,280,052.33 4,528,814.88 Less: Allowances (44.11) 1,435,281.53 3,844,770.80 3,921,063.48 11. Sundry debtors 8,282,516.67 31,148,926.56 12. Advances and credits suspense account 128,195.98 291,717.72 12,255,483.45 35,361,707.76			III. Total current assets (D I+DII+DIII) 1,099.85 7,490.25 176,545,969.84 184,421,065.37 176,547,069.69 184,428,555.62 189,060,178.42 220,003,350.00			
IV. Cash items 1. Cash on hand 1,099.85 7,490.25 3. Sight and time deposits 176,545,969.84 184,421,065.37 176,547,069.69 184,428,555.62 Total current assets (D I+DII+DIII) 189,060,178.42 220,003,350.00			D. CREDIT TRANSIT ACCOUNTS 1. Deferred income 8,284,001.32 31,191,939.65 2. Accrued expenses 62,543.04 96,234.39 8,346,544.36 31,288,174.04			
E. DEBIT TRANSIT ACCOUNTS 1. Prepaid expenses 2,338.76 4,643.00 2. Accrued income receivable 879,593.12 765,533.42 881,931.88 770,176.42			TOTAL OWNER'S EQUITY (A+B+C+D) 191,100,792.32 222,325,770.19			
TOTAL ASSETS (B+C+D+E) 191,100,792.32 222,325,770.19			CREDIT MEMO ACCOUNTS 2. Credit balances of guarantees & collateral security 20,629,931.81 21,005,024.48 20,629,931.81 21,005,024.48			
DEBIT MEMO ACCOUNTS 2. Debit accounts of guarantees & collateral security 20,629,931.81 21,005,024.48 20,629,931.81 21,005,024.48			TOTAL CREDIT MEMO ACCOUNTS 20,629,931.81 21,005,024.48			
NOTE: The Balance Sheet Account "Sundry Debtors" includes receivables amounting in total to 8,132,001.32 from fines imposed by EETT Decisions to liable parties, due to infringements of the legislation in force during the current and previous accounting periods. They will be collected according to the procedure prescribed by the Code for the Collection of Public Revenues and will be recorded in the respective revenues of the accounting periods in which they will be collected. The respective amounts of the aforementioned fines are in the "Unearned and deferred income" credit transit accounts.						
INCOME STATEMENT (PROFIT & LOSS ACCOUNT) FOR THE YEAR ENDED 31st DECEMBER 2010 (1st JANUARY - 31st DECEMBER 2010)						
I. OPERATING RESULTS			I. OPERATING RESULTS			
Amounts for the period ended 2010			Amounts for the period ended 2009			
Net Turnover (collected fees)	43,708,348.46		43,617,349.74			
Less: Cost of services provided	15,198,062.99		16,682,157.50			
Gross operating results (profit)	28,510,285.47		26,935,192.24			
Plus: Other operating income	29,234,902.25		3,921,142.51			
Total	57,745,187.72		30,856,334.75			
Less: 1. Administrative expenses	2,467,885.61		2,746,096.71			
Operating results (profit) before financial transactions	55,277,302.11		28,110,238.04			
Plus: 4. Credit interest and related income	9,067,054.24		5,687,489.54			
Less: 3. Debit interest and related income	1,971.17	9,065,083.07	2,590.87	5,684,898.67		
Total operating results	64,342,385.18		33,795,136.71			
II. PLUS: EXTRAORDINARY RESULTS			II. PLUS: EXTRAORDINARY RESULTS			
1. Extraordinary and non-operating income	26,087.32		650,495.91			
3. Prior period income	0.00		296,249.43			
4. Income from unused prior period provisions	361,960.50		77,638.94			
	388,047.82		1,024,384.28			
Less: 1. Extraordinary and non-operating expenses	664.45	224.26				
3. Prior period expenses	13,614.00	0.00				
4. Provisions for extraordinary contingencies	14,250,000.00	13,876,230.63	224.26	1,024,160.02		
Net income (profit) before taxes and extra depreciation	50,466,154.55		34,819,296.73			
Total depreciation recorded	398,072.12		993,922.71			
Less: Normal depreciation (included in the operating cost)	398,072.12	0.00	993,922.71	0.00		
NET RESULTS (PROFIT) FOR THE YEAR BEFORE TAXES	50,466,154.55		34,819,296.73			
THE ACCOUNTABLE FINANCIAL ADMINISTRATOR EETT PRESIDENT Dr. LEONIDAS I. KANELLOS I.D. No AE 085249			Maroussi, 14 April 2011 THE FINANCIAL & ADMINISTRATIVE SERVICES DIRECTOR GIORGOS M. ORFANOS I.D. No AZ 095420 ECONOMIC CHAMBER OF GREECE CLASS A REG NO 0003970			
THE HEAD OF THE EETT ACCOUNTING DEPARTMENT AGGELIKI H. SPIGGOU I.D. No AB 047533			CERTIFIED AUDITOR - ACCOUNTANT'S REPORT To the "Hellenic Telecommunications and Post Commission"			
Report on Financial Statements. We have audited the above Financial Statements of the "Hellenic Telecommunications and Post Commission" which comprise the Balance Sheet as of December 31 st 2010, the Income Statement (Profit & Loss Account) and the Income Appropriation Account for the period then ended.						
Administration's Responsibility for the Financial Statements. The Administration of the "Hellenic Telecommunications and Post Commission" is responsible for the preparation and fair presentation of the Financial Statements in accordance with the Accounting Standards prescribed by Greek Legislation, as well as for designing, implementing and maintaining an internal audit system relevant to the preparation and fair presentation of Financial Statements that are free from material misstatement, whether due to fraud or error.						
Certified Auditors' Responsibility. Our responsibility is to express an opinion on the above Financial Statements, based on our auditing data. We conducted our audit in accordance with the International Auditing Standards. These Accounting Standards require that we comply with the rules of business ethics and that we plan and perform the audit to obtain reasonable assurance that the Financial Statements are free from material misstatement. An audit involves following procedures for obtaining audit evidence about the sums and disclosures in the Financial Statements. The procedures selected depend on the auditor's judgment, including the assessment of the risk of material misstatement of the Financial Statements, whether due to fraud or error. In making those risk assessments, the auditor takes into account the internal control system which is relevant to the entity's preparation and fair presentation of the Financial Statements, in order to design audit procedures that are appropriate for the circumstances, but not for the purpose of expressing an opinion on the effectiveness of the internal control system of the "Hellenic Telecommunications and Post Commission". An audit also includes evaluating the appropriateness of the accounting policies used and the reasonableness of the Administration's accounting estimates, as well as evaluating the overall presentation of the Financial Statements. We believe that the audit evidence we have obtained is sufficient and appropriate to provide the grounds for our audit opinion.						
Opinion. In our opinion, the above Financial Statements give a true and fair picture of the economic situation of the "Hellenic Telecommunications and Post Commission" as of December 31 st 2010 and of its financial performance for the year then ended, in accordance with the Accounting Standards prescribed by Greek Legislation.						
Report on other legal and regulatory requirements. The content of EETT's President's report to the Plenary regarding the Annual Report is consistent with the accompanying Financial Statements.						
Athens, April 15 2011 THE CERTIFIED AUDITOR - ACCOUNTANT						
 Associated Public Accountants SOL SA Member of Crowe Horwath International 3 Fok. Negri Street, 11257 Athens Crowe Horwath ICPA REG. NO. 125			LEONIDAS SP. KAVVADIAS ICPA REG. NO. 10711			

6.5. Goals

The Financial and Administrative Services Directorate supports EETT's Administration and operational units, thus contributing to the daily tasks and the smooth operation of the Authority. In line with the constant effort of improving the supporting services, more emphasis will be put in the coming year on optimizing the utilization of EETT's staff and on redesigning the processes that require a great amount of human resources.

The Directorate's most important goals for 2011 are the following:

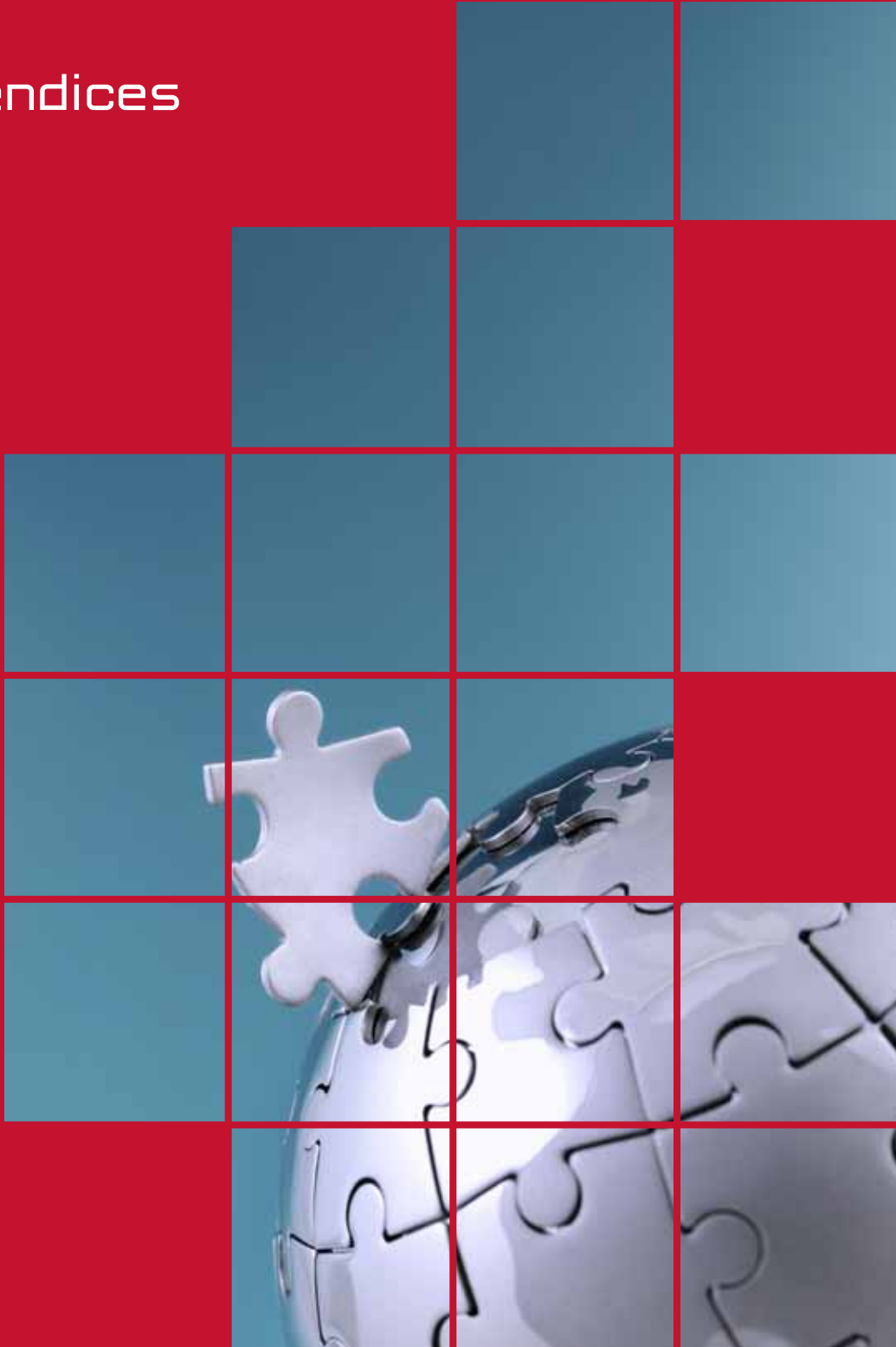
1. Supporting the process of seeking new premises for relocating EETT's headquarters in Athens, in cooperation with the Hellenic Public Real Estate Corporation (HPREC).
2. Supporting the process of establishing and operating regional offices in Heraklion and Patras.
3. Completing the process of recruiting enrolled in-house lawyers.
4. Completing the process of hiring associates for filling positions of responsibility in EETT.
5. Supporting actions for training the staff members and developing their potential.
6. Making adjustments in the office spaces for improving health and working conditions in EETT.

With regard to information support, the following goals have been set out:

1. Full implementation and utilization of the possibilities offered by the Integrated Information System (IIS), focusing on the full digitization of the handling of EETT's documents and the use of Electronic Signature.
2. Enhancing EETT's website with interactive services to the user's benefit.
3. Enriching EETT's GIS with data on collocation in ADSL, ADSL2 and other telecommunication centers and in post offices.
4. Creating an electronic platform for submitting antenna licensing applications.
5. Replacing central computing systems with modern and environmentally friendlier systems (less demanding in terms of power consumption and cooling).



7 Appendices



7.1. The Greek Legislative – Regulatory Framework (from 01-01-2010 to 31-12-2010)

Laws, Presidential Decrees and Other Legislative Acts

Number	Subject
M.D. 58134/2275/2010	Redefining the quality specifications and the terms for the provision of the Universal Postal Service
M.D. A11/50640/4810/2010	Granting transport licenses for Lorry Vehicles according to Law 1959/91

Regulatory Texts

Decision Number	Title	GG Issue
548/019/2010	Issue of Regulation for determining the Obligations of Operators regarding Access to Application Program Interfaces (API) and to Electronic Program Guides (EPG).	0161/B/19-02-2010
559/001/2010	Amendment of EETT Decision 437/001/01-06-2007 "Approval of OTE Reference Offer 2007 for the Provision of Wholesale Broadband Access services and Related Facilities", pursuant to EETT Decision 389/051/08-06-2006 (GG Issue 891/B/12-07-06).	0469/B/19-4-2010
562/029/2010	Results of the of Hellenic Telecommunications Organization S.A. (OTE S.A.) 2010 Cost Accounting Audit (with actual data as of 2008) for the regulated wholesale and retail markets to which a price control, cost accounting and accounting separation obligation has been imposed and other regulations. (GG Issue 668/B/18-5-2010), (correction GG Issue 1363/B/2-9-2010).	0668/B/18-05-2010
563/026/2010	Adoption by EETT of Decision No. 209/V/2006 of the Hellenic Competition Commission entitled "Leniency Program" in the context of article 9, par. 4 of Law 703/1977 on the terms and requirements of exemption from or reduction of fines imposed on operators that contribute in the investigation of violations of the provisions of the said Law.	0831/B/160-6-2010
564/041/2010	Approving the procedures for implementation of EETT's Managerial Capability System for planning and implementing co-financed procurement and services projects incorporated in the operational programs of the 2007-2013 NSRF and submitting an application for confirmation.	846/B/17-06-2010
565/047/2010	Approval of the final texts on interfaces according to article 4.1 of P.D. 44/2002.	14589/B/07-07-2010



566/016/2010	Amendment and Codification in a single document of the Regulation on Number Portability in the Greek Market.	0967/B/30-6-2010
570/028/2010	Amendment of EETT Decision 441/121/21-6-2007 "Regulation on the Management and Assignment of Numbering Resources of the National Numbering Plan".	1148/B/30-07-2010
570/030/2010	Approval of OTE Reference Offer for the provision of Wholesale Leased Lines, pursuant to EETT Decisions 401/014/6-9-2006 (GG Issue 1419/B/2007), 470/037/4-3-2008 (GG Issue 498/B/2008), 477/002/23-4-2008 (GG Issue 987/B/2008) and 531/064/23-7-2009 (GG Issue 1552/B/2009).	1116/B/22-07-2010
570/032/2010	Approval of EETT Decision 390/3/13-6-2006 "Regulation on General Authorizations", as in force.	1148/B/30-07-2010
570/33/2010	Amendment of EETT Decision 472/171/21-3-2008 "Issue of Collocation Regulation, pursuant to article 30 par. 3 of Law 3431/2006 GG Issue 885/B/14-5-2008".	1330/B/30-08-2010
572/007/2010	Approval of final texts on interfaces according to article 4.1 of P.D. 44/2002.	1855/B/26-11-2010
573/011/2010	Amendment of EETT Decision 482/051/24-06-08 "Cost Accounting and Cost Separation Methodologies/Principles for implementing the regulatory obligations of price control, cost accounting and accounting separation imposed on OTE in the individually defined electronic communications markets and other regulations". (GG Issue 1151/B/24-6-08) and Summoning the Hellenic Telecommunications Organization (OTE) S.A. to Publish the submitted LRAIC Model Reference Papers according to the provisions of article 2, par. ii of EETT Decision 519/056/14-4-2009 (GG Issue 837/B/06-05-2009).	1348/B/01-09-2010
573/012/2010	Approval of the 2009 OTE Reference Offer for the Provision of Wholesale Broadband Access services, pursuant to EETT Decision 531/066/23-7-2009 (GG Issue 1549/B/28-7-2009).	1364/B/02-09-2010
573/015/2010	Approval of the 2010 OTE Reference Offer for Local Loop Unbundling and Related Facilities, pursuant to EETT Decision 531/065/23-07-2009 (GG Issue 1550/B/28-07-2009).	1338/B/01-09-2010
573/016/2010	Decision Taken on the Tariff Policy Proposed by the Hellenic Telecommunications Organization S.A. (OTE S.A.) for the duct occupation and use monthly fee, the dark fiber monthly fee and the one-off cost of combined applications for WLL and ARYS.	1405/B/06-09-2010
573/017/2010	Market Definition for Wholesale call origination in the public telephone network provided at a fixed location, Wholesale call termination in individual network at a fixed location, Wholesale transit to the fixed public telephone network, Determining the Operators with Significant Market Power in the relevant Markets and their Obligations (2 nd Round of Analysis).	1353/B/01-09-2010



578/029/2010	Codification and Replacement of the Code of Practice for the Provision of Multimedia Information Services.	1651/B/15-10-2010
579/009/2010	Suspension of the tender procedure for the provision of information services relating to a comprehensive telephone and subscriber directory in printed or alternatively in electronic format for the entire Greek Territory and designation of the Hellenic Telecommunications Organization S.A. (OTE S.A.) as the Universal Service Provider.	1770/B/11-11-2010
580/010/2010	Amendment – Correction of the provisions of EETT Decision 573/015/22-7-2010 concerning the “Approval of the 2010 OTE Reference Offer for Local Loop Unbundling and Related Facilities, pursuant to EETT Decision 531/065/23-07-2009” (GG Issue 1338/B/31-8-2010).	1814/B/19-11-2010
581/007/2010	Approval of the amended Interconnection Reference Offer of the mobile telephony operator Vodafone.	20/B/18-01-2011
581/008/2010	Approval of the amended Interconnection Reference Offer of the mobile telephony operator Cosmote.	19/B/18-01-2011
581/009/2010	Approval of the amended Interconnection Reference Offer of the mobile telephony operator Wind.	22/B/19-01-2011
586/005/2010	Amendment of EETT Decision 566/016/3-6-2010 with regard to fixed number portability.	2052/B/31-12-2011
587/021/2010	Amendment of EETT Decision 570/030/8-7-2010 “Approval of OTE’s Reference Offer for the provision of Wholesale Leased Lines, pursuant to EETT Decisions 401/014/6-9-2006 (GG Issue 1419/B/2007), 470/037/4-3-2008 (GG Issue 498/B/2008) and 531/064/23-7-2009 (GG Issue 1552/B/2009)”.	2121/B/31-12-2010
588/020/2010	Determining the “Methodological principles and parameters for the Model of Economic Space between LLU and WBA” in the context of Decision 531/066/23-07-2009, and the implementation of the measure for the Monitoring of the economic space between Local Loop Unbundling (LLU) and Wholesale Broadband Access (WBA).	2138/B/31-12-2010
588/021/2010	Approval for the Regulation on “Determining the Minimum Level of Itemized Billing for Public Telephone Services”.	2153/B/31-12-2010
588/022/2010	Pricing by OTE S.A. of the electricity provided to the Telecommunications Providers in the L/Es in which they receive Physical Collocation as of 01-09-2009 pursuant to EETT Decision 531/232/23-07-2009.	2183/B/31-12-2010



7.2. European Regulatory Framework

1. "Commission Regulation (EU) No 330/2010 of April 20, 2010, on the application of article 101 paragraph 2 of the Treaty on the Functioning of the European Union to categories of vertical agreements and concerted practices".
2. "European Commission guidelines on vertical restraints" (2010/C 130/01)
3. "Commission Regulation (EU) No 1217/2010 of December 14, 2010, on the application of article 101 paragraph 3 of the Treaty on the Functioning of the European Union to certain categories of research and development agreements".
4. "Commission Regulation (EU) No 1218/2010 of December 14, 2010, on the application of article 101 paragraph 3 of the Treaty on the Functioning of the European Union to certain categories of specialization agreements".
5. "Commission Regulation (EU) No 461/2010 of May 27, 2010, on the application of article 101 paragraph 3 of the Treaty on the Functioning of the European Union to categories of vertical agreements and concerted practices in the motor vehicle sector".
6. Competition Handbook – Updated applicable rules to merger control as of April 1, 2010.
7. Best practices on the conduct of proceedings concerning articles 101 and 102 TFEU.
8. "Commission Recommendation of September 20, 2010, on regulated access to Next Generation Access Networks (NGA) - 2010/572/EU".

7.3. Glossary

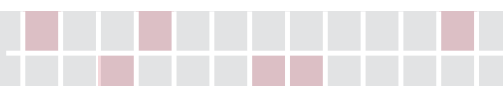
Term	Explanation
Administrative Cooperation (ADCO)	Committee responsible mainly for supporting actions with regard to the joint resolution of problems and the exchange of experiences on issues of Radio and Telecommunications Terminal Equipment (RTTE) market surveillance.
Application Program Interface (API)	The software interface between the external applications –used by radio and television operators and service providers– and the advanced television equipment for digital radio and television services.
Asymmetric Digital Subscriber Line (ADSL)	A technology for data transmission of operating over a traditional telephone line but achieving higher rates of transmission than the traditional modem (i.e. the equipment that converts the digital sign originating from an electronic computer system to an analog sign).
Body of European Regulators of Electronic Communications (BEREC)	BEREC is a continuation of the European Regulators Group (ERG). Its aim is to contribute to the development of the Electronic Communications market in the EU through the creation of a single regulatory environment in the member states.
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 in its network a call coming from the network of the other contracting party.
Carrier Pre-Selection	The option given to OTE subscribers, upon request, 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 dialing 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 bodies issuing certificates or providing other services with respect to Electronic Signatures.
Chart 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 service and the time limits within which it is provided, (b) information for users on prices based on the data affecting them including expected improvements 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-mingling	Refers to the capability of allocating 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 reserved for the operator. The maintenance and operation of the operator's equipment is carried out by the operator.
Comite European de Reglementation Postale (CERP)	A committee founded in 1992 in the frame of CEPT (European Conference of Postal and Telecommunication Administration) and dealing with postal issues.
Com-ITU	A committee of the European Conference of Postal and Telecommunications Administrations (CEPT) responsible for coordination with regard to Europe's participation in the activities of the International Telecommunications Union (ITU).
Distant Collocation	Form of collocation in which, in accordance with OTE's legal obligations, an Electronic Communications operator obtains access to OTE sources through connecting cables.
Double Play Services	The term that is used in Electronic Communications for the provision of two different services. It may refer to any combination of the following four services: (1) fixed telephony, (2) broadband Internet access, (3) television or video through the Internet, and (4) mobile telephony. However, its more common use refers to the combination of fixed telephony and Internet access.
Effective Price	The price that results from dividing the revenues of a service (e.g. long distance traffic) by the volume of this service (minutes of long distance traffic).
European Competition Network (ECN)	A network consisting of the European Commission and the Competition Authorities of the member states with the aim of protecting competition. It constitutes a mechanism for consultation and cooperation in the framework of the implementation of the competition policy of the European Community.



European Conference of Postal and Telecommunications Administrations (CEPT)	Established in 1959 as a coordinating body for telecommunications and postal services organizations. It is organized into two Committees: the Electronic Communications Committee (ECC), which is responsible for telecommunications and radio, and the European Committee for Postal Regulation (CERP), which is responsible for postal issues.
European Regulators Group (ERG)	This is an advisory group which was established pursuant to Commission Decision 2002/627/EC and comprised the heads of the Regulatory Authorities of the 27 EU member states. Today it has been replaced by BEREC.
European Regulators Group for Postal Services (ERGP)	Established in 2010 by the European Commission, its aim is to develop best regulatory practice in Europe on issues relating to Postal Services. It comprises the heads of the 27 national postal Regulators and it is assisted by a Secretariat staffed by the European Commission.
Express Delivery Voucher (EDV)	Document accompanying the postal item that contains 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 specific circumstances.
Fully Distributed Cost	The costing method according to which all the cost elements, including the indirect cost, are distributed to the generated products or the provided services through a set of algorithms,
Geographic Information System (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 integrating, storing, editing, analyzing 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. Contrary to other systems of vector design (CAD), the main GIS feature is that it operates with geographic coordinates.
Geographic Numbers	The numbers whose prefix denotes the geographic location of the number holder.
GSM Repeaters	These are devices used for boosting reception of mobile phones in restricted areas where the signal is weak.
Independent Regulators Group (IRG)	A group comprising 45 European Regulatory Authorities, which was established in 1997, aiming at the exchange of views, experiences and practices among its members concerning issues of common regulatory interest. In 2008, the process of its establishment as a legal entity was completed according to Belgian Law. It is based in Brussels.
Inmarsat PSA (Point of Service Activation)	An entity that has concluded a contract with Inmarsat for the activation and maintenance of records and accounts of Inmarsat terminals.
Information and Communication Technologies (ICT)	As a term, it refers to all the different ways in which computers are used and to the purposes of this use.



Inmarsat	International Maritime Satellite Organization. It provides telephony and data services to users worldwide via special terminals. An Inmarsat terminal communicates through satellite with ground stations. It offers reliable communications services to governments, aid agencies, media outlets and businesses with a need to communicate in remote regions or where there is no reliable terrestrial network.
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 center (node) and the switching center 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, as demonstrated by any fall in performance, wrong interpretation or loss of information which would have been otherwise received, had this unwanted action not taken place.
Jammers	These are devices that interfere in mobile telephony radiofrequency transmissions, thus preventing their reception.
Link	The total of telecommunications equipment required for the implementation of the connection between two points of an Electronic Communications network.
Local Loop	The circuit that connects the terminating point of each subscriber with the main distributor in the OTE Local Exchange.
Mobile Service	Radio service between Mobile Stations and Land Stations or between Mobile Stations.
National Numbering Plan	Rules defining the structure of numbers used by Electronic Communications operators for the provision of services to users.
National Radiofrequencies Registry (NRFR)	A data base including the total radiofrequencies assigned at the national level.
Next Generation Access Networks (NGA)	Packet Switching networks for the provision of broadband Electronic Communications services based on multiple access and backbone technologies (reaching high-quality levels). Furthermore, these technologies, if desired, could provide continuous service coverage to the user and access to more than one service operators simultaneously.
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 OKSYA II 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 in which OTE, in accordance with its legal obligations, constructs a special space in its Local Exchanges which is reserved for installation of equipment of Electronic Communications operators.
Premium Rate Service	A call whose charge is higher than the maximum normal charge for geographic numbers within the country, with part of the increased charge going to the called party who is assigned this number.
Private Mobile Radio (PRM)	The term describes professional radio networks of land mobile service used to meet not only the communication needs of various professional users but also of emergency services.
Quad Play Services	The term used in Electronic Communications to describe the combined provisions of four different services which are usually the following: (1) fixed telephony, (2) broadband Internet access, (3) television or video through the internet and (4) mobile telephony.
Radio and Telecommunications Terminal Equipment (RTTE)	Equipment which includes a transmitter and/or receiver and provides communication through radio waves by means of spectrum.
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.
Satellite Services	Services whose provision is based in whole or in part on the installation and operation of earth satellite stations networks. At a minimum, these services include radio link via earth satellite stations with the space part (uplinks) and radio link between the space part and earth satellite stations (downlinks).
Significant Market Power (SMP)	A business is considered to hold Significant Market Power when, either individually or in cooperation with other businesses, it holds a position equivalent to a dominant position, i.e. a position of financial power which allows it to operate largely unconstrained by the competitors, the customers and the consumers.
Soil Moisture and Ocean Salinity Satellite (SMOS)	A satellite used as part of the Living Planet Program of the European Space Agency (ESA) for collecting information on Earth's water cycle and climate change.
Special Postal Items Track and Trace System (SPITTS)	Information system for tracking and tracing postal items.
Specific Absorption Rate (SAR)	It is a measure of the rate at which radiofrequency radiation is absorbed by the tissues of the human body. It is used extensively in mobile phone manuals which mention the relevant specific absorption rate of a device.
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 something merits attention, the Committee issues guidelines on various matters.
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 to describe the combined provision of three different services. Usually, the term refers to any combination of three of the following four services: (1) fixed services, (2) broadband Internet access, (3) television or video through the Internet and (4) mobile telephony.
UNEX	A system of measuring the quality of Universal Service for cross-border mail in European countries, sponsored by the International Post Corporation (IPC). UNEX is not used solely among the EU-27 countries but in the whole of Europe as well (34 countries participated in the measurements of 2008).
Universal Postal Union (UPU)	The Universal Postal Union is an international organization which is today a specialized agency of the United Nations. Its objective is centered on the constant improvement of Postal Services and the promotion of international cooperation in this sector.
Universal Service (in the Electronic Communications Sector)	The provision of a fixed set of basic Electronic Communications services available to all citizens of Greece, regardless of their geographic location, at affordable prices.
Universal Service (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 high 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, and c) services of registered mail and deliveries with a declared value. The US includes both national and cross-border services.
Universal Service Provider - USP (in the Electronic Communications Sector)	The operator designated by the Greek State as having the obligation to ensure provision of the Universal Service in Electronic Communications.
Universal Service Provider (in the Electronic Communications Sector)	The operator designated by the Greek State as having the obligation to ensure provision of the Universal Service in Electronic Communications.
Universal Service Provider – USP (in the Postal Services Sector)	The operator designated by the Greek State as having the obligation to ensure provision of the Universal Service in Postal Services. Today, Hellenic Post (ELTA) is the USP in the Postal Services sector.
Very High Speed Digital Subscriber Line (VDSL)	The very high speed digital subscriber line is a technology providing faster data transmission than plain ADSL.
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 the equipment is carried out by OTE.
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 group.



7.4. Abbreviations

ADCO	Administrative Cooperation Group
ADSL	Asymmetric Digital Subscriber Line
AIA	Athens International Airport
API	Application Programming Interface
ARYS	see ADSL
ATM	Air Traffic Management
BEREC	Body of European Regulators for Electronic Communications
BQMN	Broadband Quality Measurements Node
CAA	Civil Aviation Authority
CAD	Computer-Aided Design
CEPT	European Conference of Postal and Telecommunications Administrations
CERP	Comité Européen de Réglementation Postale
COC	Chart of Obligation to Consumers
CSP	Certification Service Providers
CSS	Consumer Service Sector
DCS	Digital Communication System
DRC	Dispute Resolution Committee
DSL	Digital Subscriber Line
ECC	Electronic Communications Committee
ECN	European Competition Network
EDV	Express Delivery Voucher
EEA	European Economic Area
EET	National Telecommunication Committee
EETT	Hellenic Telecommunications and Post Commission
EKAV	National First Aid Center
ELAS	Hellenic Police
ELTA	Hellenic Post
EMERG	Euro-Mediterranean Regulators Group
EPG	Electronic Program Guide
EPISEY	Institute of Communication and Computer Systems
ERG	European Regulators Group
ERGP	European Regulators Group for Postal Services
ERT	Hellenic Broadcasting Corporation
ETA	Environmental Terms Approval
EU	European Union
FDC	Fully Distributed Cost
FESA	Forum of European Supervisory Authorities for Electronic Signatures
GGI	Government Gazette Issue



GIS	Geographical Information System
GSM	Global System for Mobile Communications
HNDGS	Hellenic National Defense General Staff
HPREC	Hellenic Public Real Estate Corporation
ICT	Information and Communication Technology
IIS	Integrated Information System
IPC	International Post Corporation
IRG	Independent Regulators Group
ISDN	Integrated Services Digital Network
ISP	Internet Service Provider
ITU	International Telecommunication Union
KV	Kabelverzweiger
JMD	Joint Ministerial Decision
L/E	Local Exchange
LLCNo	Leased Lines Central Node
LLU	Local Loop Unbundling
LRIC	Long-Run Average Incremental Cost
MD	Ministerial Decision
MITN	Ministry of Infrastructures, Transport and Networks
MLIB	Minimum Level of Itemized Billing
MMS	Multimedia Messaging Service
MSISDN	Mobile Station International Subscriber Directory Number
MSS	Mobile Satellite Service
NCRTV	National Council for Radio and Television
NGA	Next Generation Access network
NNP	National Numbering Plan
NRDNP	National Reference Database on Number Portability
NSMMS	National Spectrum Management and Monitoring System
OKSYA	Integrated Central ADSL Service Connection
ONU	Optical Network Unit
OSS	Open Source Software
OTE	Hellenic Telecommunications Organization
PABX	Private Automatic Branch Exchange
PD	Presidential Decree
PDA	Personal Digital Assistant
PDC	Postal Directive Committee
PY	Hellenic Fire Service
PMR	Private Mobile Radio
PMS	Permanent Monitoring Station
PPC	Public Power Corporation



PRS	Premium Rate Services
PSA	Point of Service Activation
PSMS	Premium Short Message Service
PSTN	Public Switched Telephone Network
PTM	Preliminary Test Model
RLAN	Radio Local Area Network
RSC	Radio Spectrum Committee
RSPG	Radio Spectrum Policy Group
RSPP	Radio Spectrum Policy Programme
RTTE	Radio and Telecommunications Terminal Equipment
SAR	Specific Absorption Rate
SMOS	Soil Moisture and Ocean Salinity Satellite
SMP	Significant Market Power
SMS	Short Message Service
SNG	Satellite News Gathering
TCAM	Telecommunications Conformity Assessment and Market Surveillance Committee
TLRP	Tank Level Probing Radar
UMTS	Universal Mobile Telecommunications System
UPU	Universal Postal Union
US	Universal Service
USP	Universal Service Provider
VAT	Value Added Tax
VDSL	Very High Speed Digital Subscriber Line
WBA	Wholesale Broadband Access
WBL	Wholesale Broadband Lines
WGFM	Working Group Frequency Management
Wi-Fi	Wireless Fidelity
WIK	Wissenschaftliches Institut für Kommunikationsdienste
Wi-Max	World Interoperability for Microwave Access
WLAN	Wireless Local Area Network



7.5. Index of Charts, Tables and Pictures

Charts

Chart I: Plenary Decisions by Subjects	11
Chart 1.1.: Monthly Progress of the Total Number of Written Complaints about Electronic Communications Services, 2009-2010	18
Chart 1.2.: Breakdown of Written Complaints about Electronic Communications Issues per Category, 2010	19
Chart 1.3.: Classification of Complaints about Local Loop, 2010	19
Chart 1.4.: Classification of Written Requests/Complaints about Postal Services, 2010	20
Chart 1.5.: Classification of Consumers' Telephone Requests/Complaints, 2010	20
Chart 6.1.: EETT's Organizational Chart	70
Chart 6.2.: Evolution of EETT's Human Resources, 2001-2010	71
Chart 6.3.: Educational Level of EETT Staff	72

Tables

Table 1.1.: Classification of Written Requests/Complaints, 2004-2010	18
Table 2.1.: Evolution of Ported Fixed and Mobile Telephony Numbers	33
Table 2.2.: Assigned [.gr] Domain Names, 2007-2010	34
Table 2.3.: Number of Assigned [.gr] Domain Names in relation to Applications, 2010	35
Table 2.4.: Number of WLR Active Connections	36
Table 2.5.: Results of EETT Hearings in the Electronic Communications Sector, 2010	42
Table 3.1.: Results of EETT Hearings in the Radiofrequency Spectrum Sector, 2010	53
Table 4.1.: Volume of Items in the Greek Postal Market	57
Table 4.2.: Revenues of the Greek Postal Market	57
Table 4.3.: Domestic First Priority Mail	59
Table 4.4.: Percentages of Mail Delivery in "Zone A" Countries	60
Table 4.5.: Percentages of Mail Delivery in "Zone B" Countries	61
Table 6.1.: Employee Distribution per Staff Category 2002 – 2010	72

Pictures

Picture 6.1.: Electronic Submission of Applications for Providers	74
Picture 6.2.: Webpage for the 5 th EETT International Conference	74
Picture 6.3.: EETT Website for the "CLARITY" Program (DIAVGEIA)	75



Hellenic Republic
Hellenic Telecommunications & Post Commission
60 Kifissias Avenue, 151 25 Maroussi, Athens, Greece
Tel. +30 210 615 1000 • Fax. +30 210 610 5049
www.eett.gr • info@eett.gr



EETT

HELLENIC TELECOMMUNICATIONS & POST COMMISSION