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Your reference: Public Consultation - Spectrum Management Information System Our reference:

Phone/Email: +49 (0) 7227 9535 - 600 Info@LStelcom.com Date: 2013-03-19

Response to the Public Consultation – Spectrum Management Information System with integrated Platform for Electronic Submission of Requests

Dear Sirs.

With great interest we have studied the tender documentation concerning the "Spectrum Management Information System with Integrated Platform for Electronic Submission of Requests" you have published for public consultation. We appreciate the opportunity to give you our view on the tender specifications for this project, which we herewith provide to you.

LS telcom has more than 20 years of experience in delivering professional Spectrum Management Systems to national regulators like the National Telecommunication and Post Commission (EETT) of Greece. Customers in more than 90 countries rely in their day-to-day operation on our systems and services. LS telcom is the leading force in driving innovation and the implementation of modern and reliable Spectrum Management Solutions. One good example for the reliability and quality is EETT's still operational Spectrum Management System implemented by LS telcom ten years ago.

First of all we would like to congratulate EETT to the published specification. In our view EETT has prepared an excellent basis for the implementation for a professional, modern and innovative system as it is in operation only in few countries in Europe. Especially the integrated platform for electronic submission of requests as well as the information about radio spectrum usage and licensed antenna constructions will provide state of the art means of communication and information to the Greek public and EETT's stakeholders.

Besides the above we have analyzed the tender specifications also concerning the published budget and implementation period. In general EETT's requirements are achievable. Based on our experience from previous projects with similar technical requirements, the given budget is underestimated and puts considerable risk on this project.

LS telcom AG

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To mitigate the financial risk we kindly suggest you to consider a phased project implementation approach and to re-priorities your requirements published in the tender specification. Our suggestion would be to reschedule low priority and "nice to have" requirements to a separate system upgrade phase at a later stage.

The planned implementation period of 16 months for this project seems to be rather challenging compared to the given specification. Our experience shows that especially the phase for detailed design and specification of the solution as well as the one for configuration and adaptation of the system need more time. We identified this as a risk for a successful implementation of the overall system.

To mitigate the risk of the project implementation timeframe we suggest you to consider extending the implementation period by four to six months.

The published model of contract provides a solid basis for the project and we agree in general with the stipulations. We only wonder if there can be some room for the supplier's license terms and conditions for standard software applications can be provided. In addition an industry standard limitation of liability clause, which complies with the needs to manage the contractual risk for public limited companies, would be appreciated.

Once again thank you very much for the opportunity to familiarize with your specification and possibility to provide our view. We think the implementation of Spectrum Management Information System with an integrated platform for electronic submission of requests will be a big and important step towards the future for EETT. We hope to be a part of this project and to support EETT also in the years to come.

Sincerely Yours

Daniel Nowok

Senior Account Manager Sales and Marketing