

To the attention of
Professor Konstantinos Masselos, President
EETT
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Brussels, 30 April 2020

Dear Professor President Masselos,

Public consultation regarding the granting of rights of use for radio frequencies in the 700 MHz, 2 GHz, 3400–3800 MHz and 26 GHz bands

The **European Competitive Telecommunication Association (ecta)** represents those alternative operators who, relying on the pro-competitive EU legal framework that has created a free market for electronic communications, have helped overcome national monopolies to give EU citizens quality, choice and investments at affordable prices.

The Covid-19 pandemic has created a truly unprecedented situation which affects us all. Our hearts go out to anyone who's been impacted by the virus, either directly or indirectly.

During this time, our sector has demonstrated how fundamental it is for the continuity of economic activity to facilitate distant working and give access to online education. All these facilities being allowed by efficient networks and innovative digital services. These tools help preserving social ties and give opportunities for new entertainment initiatives. They also contribute to the fight against the spread of the virus, by routing emergency calls or allowing teleconsultations.

Furthermore, as mentioned by the European Commission: *"The 'fifth generation' of telecommunication systems, or 5G, will be one of the most critical building blocks of our digital economy and society in the next decade.¹"* and, amongst others, the World Economic Forum highlights the positive impact of the Fourth Industrial Revolution and its related emerging technologies through a wide-scale deployment of 5G communication networks in their recent White Paper². *"The key functional drivers of 5G will unlock a broad range of opportunities, including the optimization of service delivery, decision-making and end-user experience"* they further mention. They estimate that \$13.2 trillion in global economic value will be made possible by 2035, generating 22.3 million jobs in the 5G global value chain alone.

¹ <https://ec.europa.eu/digital-single-market/en/towards-5g>

² World Economic Forum, White Paper "The Impact of 5G: Creating New Value across Industries and Society" 20 January 2020

Unfortunately, the road to 5G is accompanied by an inevitable increase in infrastructure costs that are not only very significant but also largely outweigh the investment required for 4G.

Therefore, [ecta](#) is closely monitoring regulatory conditions supporting the deployment of new networks, such as 5G, while also ensuring that the market continues to be competitive in accordance with the objectives defined in Article 3 of the European Electronic Communications Code and more particularly:

- (a) promote connectivity and access to, and take-up of, very high capacity networks, including fixed, mobile and wireless networks, by all citizens and businesses of the Union;
- (b) promote competition in the provision of electronic communications networks and associated facilities, including efficient infrastructure-based competition, and in the provision of electronic communications services and associated services.

[ecta](#) has thus applauded the Greek Government's intention to create an environment whereby investment in competitive telecoms infrastructure, and in particular 5G, is encouraged. This includes the forthcoming spectrum award process which will most likely be concluded at a time when the Greek economy and its market players will be strained by the consequences of the COVID-19 pandemic.

More than ever, the telecom sector and its infrastructure will be instrumental to the economic and social recovery after the Covid-19 pandemic. In this context we urge EETT, in the frame of its mandate, to ensure that funds destined to long-term investment, particularly from challenger operators, are not deviated into short term expenditure related to the assignment process itself but are prioritized to maximize roll-out & coverage. As such, we caution against excessive reserve prices and demanding payment terms. At the end, each Euro can only be spent once and each Euro that is spend for spectrum is a Euro that will not be invested in the networks.

Regarding reserve prices, [ecta](#) understands the intention of EETT to set reserve prices based on the results of international benchmarking. However, we strongly recommend considering the specific Greek circumstances i.e. the overall economic situation and the EMF restrictions (more particularly in the 700MHz band) that justify a substantial discount in the benchmark auction prices.

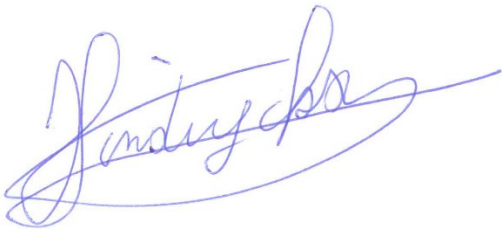
As far as payment terms are concerned, [ecta](#) would like to draw your attention to other jurisdictions that have opted for more reasonable payment terms than the one proposed by EETT, namely Denmark, Italy, Spain and Finland. Based on EU practice, [ecta](#) would suggest that EETT considers the very minimum advance payment, instalments throughout the duration of the licenses and that no payments are required before the start of the spectrum licences. This is especially relevant for the 700MHz and 2100MHz licences, which are not due to start before 2021.

[ecta](#) believes in the instrumental role of competitive 5G networks, services and applications for the advent of the fourth industrial revolution (Industry 4.0). Therefore, it is of the essence to ensure that operators are put in a position to fully exploit their financial capabilities. This is of particular relevance for challenger operators as we can't insist enough on the role of competition in the electronic communication sector to unleash the innovation potential in all other sectors of the European Economy and hence, the decisive contribution of alternative players.

To this end we also welcome EETT to consider applying their proper rules and procedures in the assignment process to safeguard the level playing field and warrant a fair/balanced share of spectrum between all market players in the bands of 700Mhz & 2100Mhz.

It is only by ensuring a pro-competitive and investment-friendly assignment procedure, in line with the Government's statements, that telecoms infrastructure, and in particular 5G, will materialize the benefits of the Gigabit society at national, and thus, at European level.

Yours sincerely,

A handwritten signature in blue ink, appearing to read 'Luc Hindryckx', with a long horizontal flourish extending to the right.

Luc Hindryckx
Director-General, [ecta](#)