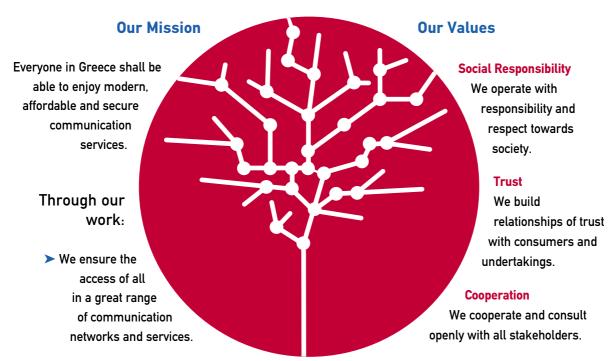
## **Our Identity**

#### **Our Vision**

Our Vision is to expand and constantly upgrade Communication so that our country can participate in the Knowledge Society.



- We safeguard the rights of the consumers of telecommunication and postal services.
- We constantly inform the consumers of their rights and obligations.
- We secure the utilisation of scarce national resources, such as the spectrum of radio frequencies and the numbering resources.
- We contribute to the development of the telecommunication and postal services markets by creating a regulatory environment according to the principles of competition.

#### **Team Spirit**

We cultivate team spirit in our staff for the accomplishment of our common goals.

#### **Transparency**

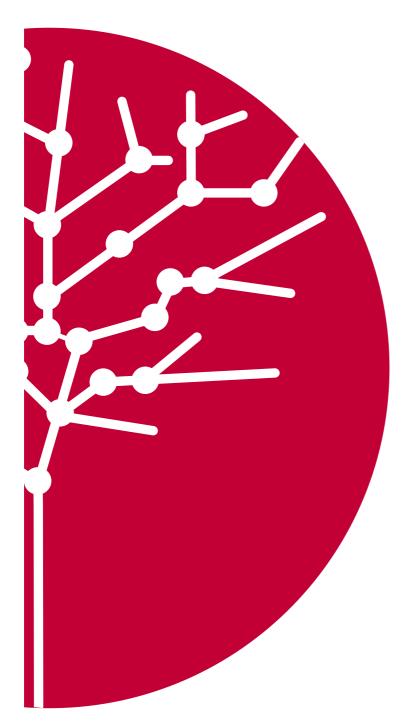
We apply procedures, known in advance to all stakeholders.

#### **Non Discrimination**

We apply the legislation without any discrimination.

#### **Evolution**

We get informed of all developments in our sector and we continuously develop ourselves as individuals as well as an Organization.



The present Annual Report refers to the activities of EETT during the period from January 1st to December 31st, 2004.

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

EMMANOUIL GIAKOUMAKIS PRESIDENT

**DIMITRIOS DIMITROPOULOS**VICE-PRESIDENT FOR THE SECTOR
OF TELECOMMUNICATIONS

**ARISTIDES MANTAS**VICE-PRESIDENT FOR THE SECTOR
OF POSTAL SERVICES

EMMANOUIL KONDYLIS MEMBER

NIKOLAOS KOULOURIS MEMBER

VASSILIOS MAGLARIS MEMBER

PANAYIOTIS POULIS MEMBER

FILIPPOS SPYROPOULOS MEMBER

**DIMITRIOS CHRYSSOULIDIS**MEMBER

### Message from the President

The obligation of EETT to submit the Annual Report is at the same time a chance to evaluate its work as well as the progress of the markets it monitors and regulates. In the telecommunications sector, 2004 was registered as:

- The fourth year of operation of the telecommunications market in full liberalization regime.
- b) The year of the Olympic Games in Greece, and of the Olympic Games with the highest use of radio frequencies in the history of the Games.
- c) The year that a modern radio spectrum management and monitoring system operated in Greece for the first time.

Higher competition in the telecommunications market with the introduction of new services, such as Number Portability, and the dissemination of existing ones, such as Carrier Selection and Pre-selection, with the protection of consumers' rights, the effective market monitoring and the imposition of penalties in cases of non-compliance with the telecommunications and competition legislation, confirm that, with EETT's contribution, the liberalization of the telecommunications market is a fact with only positive results for consumers, the Greek economy and the State.

The successful management of the electromagnetic environment during the Olympic Games was a major success, not only for EETT who was responsible for it, but for Greece as well. The greatest use of radio spectrum ever was observed during the Olympic Games, and notably in the Greek electromagnetic environment, which is not distinguished for its order. Nevertheless, we succeeded. And it was not a matter of luck, but the result of systematic preparation, organization and hard work.

Greece was the last country in the European Union (EU) which acquired a radio spectrum management and monitoring system. Naturally, the Olympic Games acted as a catalyst, but the result was the fruit of coordinated efforts taken by EETT which had already started since 2002.

In the postal services sector, Greece keeps up with the pace of the EU, gradually moving to the free market. In 2004, the control of the deregulated market was intensified and we insisted on quality issues of the

Universal Postal Service.

Certainly, the liberalization of telecommunications was a big, significant and decisive step for the development of telecommunications in Greece. But there is still much work to be done. Today, EU in its whole is making another great effort. Successful transition from telecommunications to electronic communications is a criterion for participation in the Knowledge Society. The new effort requires positive inclusion of the Greek society in the significant steps taken worldwide.

Despite the great delay of our country to harmonize its legislation with the new European Regulatory Framework of Electronic Communications, EETT proceeded to a number of actions in 2004, aiming at the prompt application of the new Framework, immediately after its transposition into the Greek legislation. The new Framework application shall strengthen competition in individual markets and shall encourage undertakings of the sector to invest in technological innovations and implement the appropriate business strategies, in order to meet current demands of the Electronic Communications market.

Finally, I would like to note that eventhough the Independent Regulatory Authorities are a new institution for our country, they have underlined the significance of their role in the operation of competitive markets to the benefit of consumers. In recent years, EETT has made full and effective use of the benefits of the Independent Regulatory Authorities institution. With its work, EETT has contributed to the increase of the social capital of confidence in institutions and has proved the State right for trusting EETT with important competences, great supplies and resources.

At this point, I would like to thank the excellent staff of EETT for its ongoing efforts, the Greek State which ensured the necessary framework for successful efforts and finally, the family of European Regulators and the European Commission, which have contributed to the work of EETT through solidarity and team spirit.

Emmanouil A. Giakoumakis EETT President

Maroussi, March 2005

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## **INTRODUCTION**



### Introduction

The primal priority of EETT for 2004 was to contribute to the successful conduct of the Olympic and Paralympic Games in Greece. In parallel, EETT continued its multiple regulatory and monitoring work, on the basis of establishing competition in the telecommunications and postal market and of meeting the needs of consumers as regards quality and price of the provided services. A brief summary of the major activities per sector, follows in this chapter.

#### **Olympic Games**

The role of EETT in the conduct of the Games was decisive for the successful and safe holding, as well as for the worldwide television and press coverage, through effective coordination and control of wireless systems and securing uninterrupted provision of telecommunications services.

The extensive use of a large number of wireless devices in geographically restricted areas (e.g. Olympic venues) and the increased needs to cover telecommunications networks in order to serve massive attendance of visitors, created large demands in radio spectrum and increased risks of interferences. Subsequently, cautious planning and organization were required to meet the needs of users and ensure the clearance of the radio spectrum.

In this light, EETT proceeded to the following actions:

- Made a detailed listing of needs and saw to the provision of additional bands in the cases were limited spectrum availability was ascertained.
- Particular emphasis was laid on the coordination of available frequencies in order to avoid harmful interferences, ensuring the smooth operation of the systems and at the same time meet new needs of users, even during the Games.
- Designed and utilized -for the first time in Olympic

- Games- a special internet application, aiming at the fully electronic submission, monitoring and processing of requests.
- ➤ EETT was monitoring the radio spectrum, on a permanent basis, especially at the Olympic venues and the wider area of Attica, exploiting the advanced capacity of the National Spectrum Management and Monitoring System (NSMMS) to ensure immediate response to any interference.
- Conducted a sampling control of the radio equipment to be used at Olympic venues, aiming at ensuring compliance with the provisions of the relevant radio frequency assignment licence.
- ➤ Elaborated an Emergency Operational Plan on the coordination of necessary actions for the uninterrupted supply of high-quality telecommunications services to users, and took proactive actions for the dissuasion of problems during the provision of those services.
- Proceeded to the necessary actions in order to ensure that users needs in postal services of the sector are met by all undertakings.

#### **Telecommunications Sector**

EETT's, actions in recent years (2001-2004) contributed to the establishment of competition in the telecommunication market, a fact that is reflected in an ensemble of indicators on market progress for 2004. The results of alternative providers and of the market shares they hold in traditional telephony are a characteristic example. Interventions both at regulatory and monitoring-controlling level are critical components in this course.

Developments in the international and national level render it clear that the growth gear of the telecommunication market and a source of income/ profitability with increasing significance, is the provision of new added value services, mainly in mobile telephony and data services and secondly in traditional telephony. This turn was made identified in 2004 in Greece too. Mobile Telephony Companies (MTC) focused on the provision of new services such as Multimedia Message Service (MMS) quadrupled within a year. Moreover, the largest fixed alternative providers turned their interest to new services, such as free of charge, shared and additional charge calls, while at the same time they have been actively involved in the provision of broadband access and services.

The anticipated new Law on telecommunications to harmonize Greek legislation with the new Regulatory Framework of the European Commission is expected to constitute a decisive factor for the further growth of the market.

Responding to the aforementioned developments and the market needs and on the basis of the existing legislative framework, EETT has proceeded to regulatory and monitoring interventions aimed at promoting and ensuring fair competition in telecommunications networks and services. High priority was given to Interconnection issues and especially in the reduction of termination fees to networks mobile telephony and ensuring Interconnection services related to non-geographic numbers. Particular importance was also placed on the implementation of the regulatory framework with regards to the provision of Leased Lines by OTE, that is the operator with Significant Market Power (SMP), the dealing with issues which arose in the implementation of Carrier Pre-selection, the promotion of Number Portability and finally the control and definition of the cost of OTE and MTC services that are under relevant regulation.

In parallel, EETT proceeded to market analysis for call termination to mobile networks and the communication of the relevant results to the European Commission, in the context of EETT's preparation for the prompt implementation of the new European Regulatory Framework and the adoption of the suggested relevant regulatory obligations immediately after the passing of the new Law on telecommunications, an initiative which was endorsed by the European Commission. Moreover, EETT launched the project for the analysis of the remaining individual markets and continued the realization of the project which had started in 2003 for collection of data from the telecommunication market which will facilitate the analysis of the aforementioned individual markets. Finally, the necessary Information Technology (IT) infrastructure was developed for the control and utilization of that data.

In 2004 EETT, acknowledging that Greece lags behind the other member states of the European Union (EU) and despite EETT's limited competences due to the non transposition of the new European Regulatory Framework in Greek law, it has particularly emphasized on the development of access markets and broadband services, especially dealing with issues and promoting Local Loop Unbundling (LLU) and ADSL Access. The positive results of these actions are reflected in the significant increase of LLU and ADSL connections during the second semester of 2004, which demonstrates the market's interest.

At the same time, the actions to promote the Internet were continued, with the launch of the Registrants-Registrars- Registry scheme for the assignment of Domain Names holding the [gr.] suffix and the integration of the regulatory framework for the implementation of Voluntary Accreditation (VA) of Certification Service Providers (CSP).

EETT also proceeded to actions in order to deal with consumers' problems and inform them about the provided telecommunications services. The most important ones were the information campaign about Number Portability, the comparative presentation of

telephony tariffs on EETT's website and the actions to deal with delays on the issue of a Comprehensive Directory which will include all registered fixed and mobile telephony numbers. Moreover, significant were the actions for the calculation and publication of quality indicators for telecommunications networks and services and the preparation of action plans to deal with emergencies which might arise in telecommunications networks.

#### Radio Spectrum Sector

Radio spectrum is a national resource of decisive importance for the provision of modern telecommunications services. It is a scarce resource given that the total of frequencies that can be assigned to a specific geographic region is finite. Therefore, the method of disposing and the terms of its use are particularly important to ensure optimum utilization and maximization of users' benefits.

The primary goal of EETT for the year 2004 was, as already mentioned, the provision of a secure and reliable radiocommunication environment during the Olympic and Paralympic Game.

In parallel with the support of the Games, EETT reinforced its mechanisms for the integrated management and effective spectrum monitoring. EETT's task was particularly supported by the integration of the NSMMS in its operations. Using this advanced system, EETT reformed and optimized the frequency assignment criteria, in order to ensure high quality of services and improve spectrum availability. It also upgraded the operation of the National Antenna Mast Construction Registry (NAMCR) for the efficient management of antenna systems in the cases of collocation of two or more providers in the same antenna construction.

Also, the NSMMS significantly enhanced the EETT spectrum monitoring capabilities, given that

transmissions control is enabled over a wide range of frequencies. The new monitoring equipment was integrated in the EETT operations and was fully commissioned immediately. Consequently, the response time to complaints for interferences was significantly reduced and the performance of an ensemble of controls throughout the Greek territory was made possible. Particular importance was placed to the protection of Civil Aviation Authority (CAA) frequencies from radio broadcasts.

In parallel to the above, EETT proceeded to the necessary actions to ensure the use of legitimate equipment. More specifically, it specified and published the appropriate technical characteristics for placing on the market and use of radio equipment in our country. It also communicated the interfaces of telecommunication providers, so that every equipment manufacturer could manufacture terminal equipment which can be connected and effectively used on any public telecommunications network.

#### **Postal Services Sector**

In the area of postal services, EETT focused in 2004 on the implementation of the new Regulatory Framework, the monitoring and control of the postal market, as well as the securing of consumers' rights.

More specifically, the new Regulations on General Authorizations and Individual Licences, which had been issued in 2003, came into force and created a more effective and flexible activity framework for postal undertakings. These Regulations established quality rules, both for Courier services and the deregulated Section of Universal Service (US), aiming at ensuring market operation in a healthy competitive environment to the benefit of consumers.

During the year, EETT particularly focused on postal market monitoring, by performing regular controls on postal undertakings holding a General Authorization. In addition, controls were intensified for the identification of undertakings which illegally provided postal services, namely without holding the required General Authorization or Individual Licence, were intensified. In the cases of undue provision of postal services or illegal activity, hearings took place and the provided administrative sanctions were imposed.

EETT also focused on resolving consumers' complaints. In particular, it handled a significant number of issues/ cases, investigating their causes and intervening, in collaboration with the postal undertakings and the Universal Service Provider (USP), towards their amicable resolution.

Finally, having as a main concern to secure consumers' rights, EETT continued measuring US quality, provided by the USP, aiming at the improvement of provided services.

#### **European & International Partnerships**

The main goal of EETT for international relations during 2004 was to participate in the formation of regulatory developments, mainly at a European level, to continue good collaboration with the European Commission, and present its experience and work at international fora.

To this end, EETT collaborated with the other members of the European Regulators Group (ERG) to the adoption of a common position as regards the suitable regulatory obligations which may be imposed on providers by National Regulatory Authorities (NRA), on the basis of the new Regulatory Framework, which was published in April 2004. Also, in the context of the particular Group, EETT participated in the opinion-giving on the revision of the European Commission (EC) Recommendation of 1998 on accounting separation and regulatory costaccounting, while it took action, together with all European NRAs in identifying the appropriate regulation in the wholesale market of international roaming.

The general collaboration with the European Commission continued in 2004, with EETT participating as an expert in relevant telecommunications, spectrum and post groups and contributing to the 10<sup>th</sup> Report on the Regulations and Electronic Communications Markets in Europe.

EETT also proceeded to the presentation of its experience and position in spectrum management and telecommunications regulation issues in a number of regional conferences and bilateral collaborations.

#### **Other Actions**

The particularly high requirements of EETT's work constitute as imperative the effective internal organization and its staffing with highly trained personnel. For this reason, in 2004 EETT placed special importance in enhancing its resources with dynamic staff, able to meet the requirements of its role.

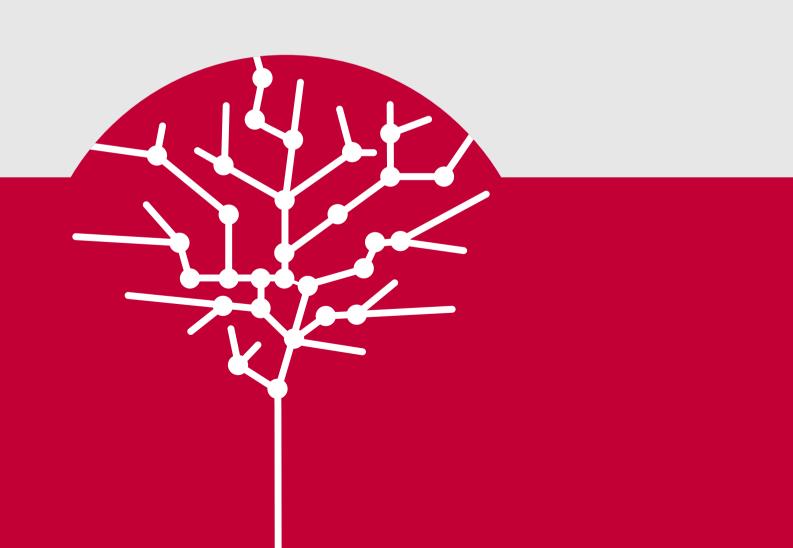
Also, the internal organization and regulatory work of EETT was significantly facilitated by IT applications. More specifically, the upgrading of IT support with the creation of new applications (e.g. management of telecommunication market data) contributed to the more effective operation of EETT, while the provision of new internet services (presentation of telephony tariffs) contributed to the provision of ample information to consumers. In parallel with the implementation of applications, mechanisms were developed in 2004 for the monitoring and improvement of information services provided to EETT users.

In the context of the general strategic plan, the Operational Plan for 2004 was successfully implemented, while the strategic goals and actions for the years 2005 - 2007 were set. EETT's participation in the Operational Program "Information Society" (OP-IS) under the 3<sup>rd</sup> Community Support Framework (3<sup>rd</sup> CSF) was also important.

The following Chapters present EETT's actions per sector. In parallel, quantitative information is provided, which confirm the positive results of EETT's interventions in

individual sectors on the one hand, and the development demonstrated by telecommunications and postal services markets in Greece in 2004 on the other hand.

## **OVERVIEW OF MARKETS**



### 1. Overview of Markets

In the Chapter "Overview of Markets", series of statistical data regarding the telecommunications and postal services markets, are illustrated.

In the telecommunications services sector, from the general financial overview it is evident that the mobile telephony market keeps developing, contrary to the fixed telephony market which shows a decline. This conclusion is in line with the corresponding conclusions of the 10th Report of the European Commission (also see subsection 7.1.4.) for all member states.

In fixed telephony market, competition is enhanced. This arises from the stable increase of the shares of the alternative providers and decisively contributes to tariffs reduction to the benefit of consumers.

The Internet connections and revenues have significantly increased resulting to an upward trend of the Internet market.

A significant increase of ADSL connections and Unbundled Access to the Local Loop (LLU) lines is demonstrated, reflecting the strong interest of the market. However, Greece, remains in the last positions of the EU25, as also stressed in the 10<sup>th</sup> Report of the European Commission.

High growth rates can be observed in the postal services sector. As regards the Courier services market, 2004 was marked by a significant increase in the volume of delivered postal items. Equally important was the increase in the volume of domestic mail within the Universal Service (US).

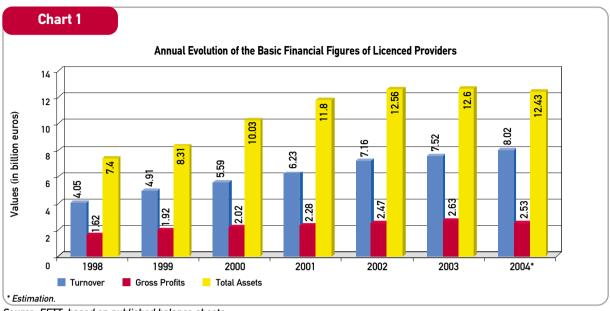
#### 1.1. Telecommunication Services

# 1.1.1. Financial Figures of the Telecommunication Market

The specific financial overview of the Greek telecommunication market is based on the published balance sheets of licensed providers during 1998 - 2003. Especially, for 2004, the various financial figures are based on estimates, taking into consideration the quarterly statements released by those providers listed on the Athens Stock Exchange (ASE), as obliged by the relevant for Stock Exchange registered companies legislation. Moreover the overview is based on information collected by EETT on a sixmonth basis from licensed providers as regards turnover, investments, number of staff, etc.

The evolution of the Greek telecommunication market follows the general trends of the European market, as these are recorded in the 10<sup>th</sup> Report of the European Commission. More specifically, fixed telephony shows downward trends from 2002 on, which can be attributed (according to the Report) both to the compression of prices due to competition and the substitution of fixed telephony by mobile telephony.

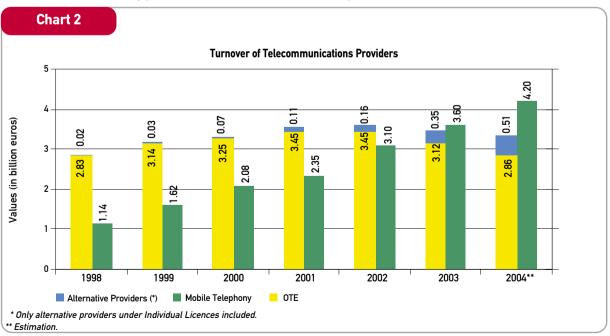
On the contrary, mobile telephony keeps growing at stable rates. The total Greek market, as shown in Chart 1, measured on the basis of turnover, displayed an increase during the years 2003 - 2004 (5.1% for 2003 and anticipated 6.6% for 2004). It is estimated that in 2004 both gross profits and total assets remained, more or less, at the same levels as in 2003, with a slight decline of 3.6% and 1.4% respectively.



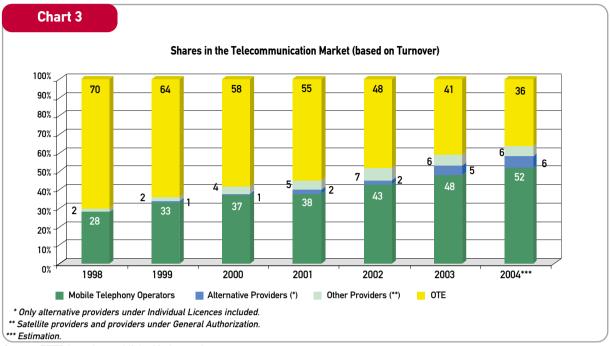
Source: EETT, based on published balance sheets

The evolution of the turnover (namely all revenues of a provider during a year) is shown in Chart 2. It is noted that, based on 2004 estimates, OTE revenues declined in comparison to alternative providers and Mobile Telephony Operators (MTOs). Therefore, the share of OTE in the entire telecommunication market (measured on the basis of turnover) was reduced to 36% for 2004 compared to 41% for 2003 and 55% for 2001 (Chart 3). Accordingly, the share of alternative

providers of fixed telephony was significantly increased, standing at 6% in 2004 compared to 2% in 2001. The MTO increased their share to 52% compared to 48% in 2003 and 38% in 2001, exceeding 50% for the first time. It should be noted that the turnover of MTO exceeded for the first time the turnover of 0TE in 2003. This is in line with the status in Europe, as it is recorded in the 10<sup>th</sup> Report of the European Commission.



Source: EETT, based on published balance sheets



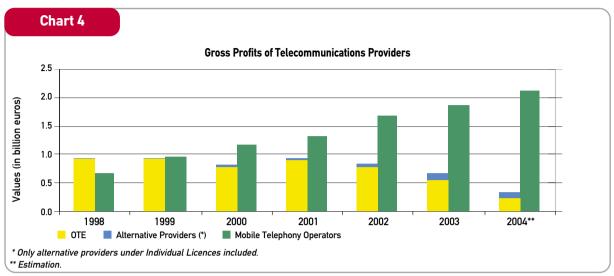
Source: EETT, based on published balance sheets

It should be also noted that over 90% of the telecommunications providers revenues originate from telecommunications services, while the remaining 10% comes from the marketing, installation and exploitation of telecommunications networks (according to the providers' answers to the bi-annually questionnaires of EETT).

The progress of gross profits (i.e. the difference between turnover and cost of goods sold) is in line with the turnover. As shown in Chart 4, MTOs gross profits displays a continuous and stable increase and is expected to exceed 2.1 billion euros for 2004. On the contrary, OTE gross profits continued to decline and they are estimated at 226 million euros in 2004 (compared to 552 million euros for 2003 and 773

million euros for 2002). It should be noted that the estimate of gross profits of OTE for 2004 is based on the following assumption: the annual rate of change in gross profits resulting from the published balance sheets for the nine-month period, equals the respective annual rate of change in gross profits based on balance sheets for the twelve-month period. The gross profit of alternative providers is expected to exceed 100 million euros being close to 2003 results (111 million euros).

The above progress of gross profits may be correlated to the low growth in the provision of access and broadband services, which (according to the 10<sup>th</sup> Report) is one of the main growth gears of the European telecommunication market.

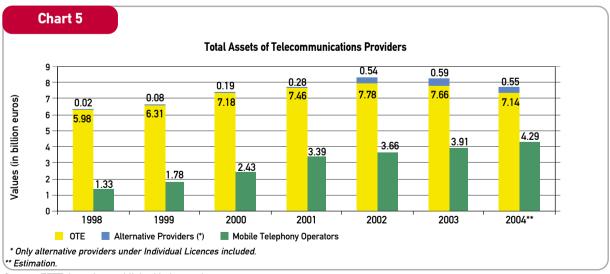


Source: EETT, based on published balance sheets

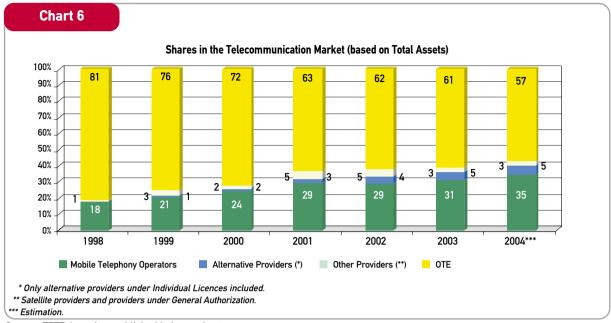
The evolution of assets (i.e. all funds of a provider and including fixed assets such as buildings, machinery, etc, as well as current assets such as cash, receivables, stock, etc.) is shown in Chart 5. OTE kept its far-leading position with estimated total assets at 7.14 billion euros for 2004, although it showed a slight decline compared to the 2003-2004 period. The MTOs kept developing their assets which are estimated at 4.3 billion euros in 2004 (compared to 3.9 billion euros for 2003). On the contrary, alternative providers, following the boom of 2002 (280 to 540 million euros), remained rather stable in the next

two years [585 million euros in 2003 and 550 million euros in 2004 (estimate)].

As shown in Chart 6, OTE retains more that 50% of the total assets of the market, even though its share declines 57% (estimate) for 2004 compared to 63% in 2001). This reduction is due to the increase of total assets mainly of MTOs, and secondly of alternative providers. It may also be attributed to possible transfer of assets by OTE to subsidiaries.



Source: EETT, based on published balance sheets



Source: EETT, based on published balance sheets

Table 1 summarizes the information on which the conclusions above are based.

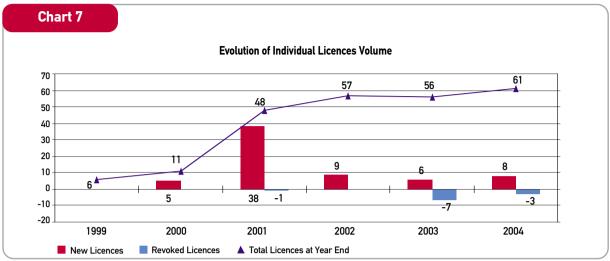
Table 1							
Evoluti	on of Telecom	munication	s Companie	s Financial	Figures		
Turnover (in billion euros)	1998	1999	2000	2001	2002	2003	2004***
OTE	2.83	3.13	3.25	3.45	3.45	3.12	2.86
Alternative Providers (*)	0.02	0.04	0.07	0.11	0.16	0.35	0.51
MT0s	1.14	1.62	2.08	2.35	3.10	3.60	4.20
Other Providers (**)	0.06	0.12	0.19	0.32	0.45	0.45	0.45
Total	4.05	4.91	5.59	6.23	7.16	7.52	8.02
Gross Profits (in billion euros)							
OTE	0.93	0.91	0.78	0.89	0.77	0.55	0.23
Alternative Providers (*)	0.01	0.01	0.03	0.04	0.06	0.11	0.10
MTOs	0.67	0.96	1.17	1.33	1.67	1.88	2.12
Other Providers (**)	0.01	0.04	0.04	0.02	-0.03	0.09	0.08
Total	1.62	1.92	2.02	2.28	2.47	2.63	2.53
Total Assets (in billion euros)							
OTE	5.98	6.31	7.18	7.46	7.78	7.66	7.14
Alternative Providers (*)	0.02	0.08	0.19	0.28	0.54	0.59	0.55
MT0s	1.33	1.78	2.43	3.39	3.66	3.91	4.29
Other Providers (**)	0.07	0.14	0.23	0.67	0.58	0.44	0.45
Total	7.40	8.31	10.03	11.80	12.56	12.60	12.43

<sup>\*</sup> Only alternative providers under Individual Licences included.

Source: EETT, based on published balance sheets

<sup>\*\*</sup> Satellite providers and providers under General Authorization.

<sup>\*\*\*</sup> Estimation.

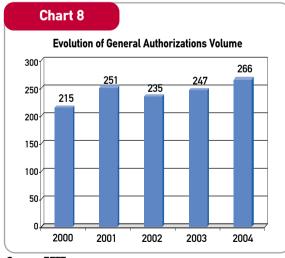


Source: EETT

#### 1.1.2. Licensing

Charts 7 and 8 present the annual growth of licensed providers (holders of Individual Licences as well as of General Authorizations). Starting from the beginning of 2001 till the end of 2004, Chart 7 reflects market potential in terms of Individual Licences. After 2001, when the main volume of Individual Licences was granted, some new Individual Licences are granted every year, corresponding to 10% to 20% of existing ones.

Furthermore, Table 2 illustrates the number of Individual Licence holders per activity, by the end of 2004.



Source: EETT

It is noted that the Individual Licence is required for the installation of telecommunications networks through public areas (rights of way) and the provision of telecommunications services, through the use of scarce resources (i.e. numbers or frequencies). In this context, a provider may hold Individual Licences for different activities (Table 2). A General Authorization is required to perform any telecommunications activity not falling in the scope of the Individual Licence.

It should be stressed that according to the new European legislative framework the specific regime of General and Individual Licences is repealed Transposition of the European legislation into the Greek legislation is expected during 2005.

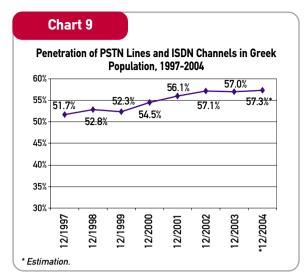
Table 2							
Number of Providers holding Individual Licence (per Activity, on 31-12-2004)							
Activity	Number of Providers						
Voice Telephony and Fixed Network	12						
Development							
Voice Telephony	13						
Fixed Network Development	2						
Satellite	11						
2 <sup>nd</sup> Generation Mobile Telephony	4						
3 <sup>rd</sup> Generation Mobile Telephony	3						
TETRA	1						
W – LAN	6						

Source: EETT

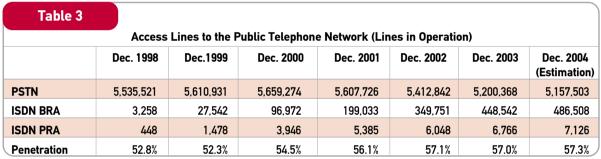
#### 1.1.3. Retail Services

### i. Access to the Public Switched Telephone Network

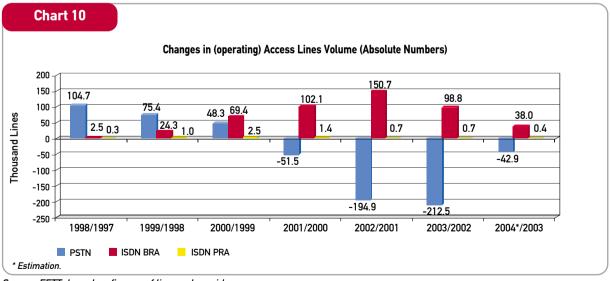
In 2004, access of the Greek population to the Public Switched Telephone Network (PSTN) (measured in lines equivalent to 64 Kb/s), remained at stable levels compared to the two previous years (Chart 9 and Table 3), with the relevant share of OTE exceeding 99%. The annual evolution in PSTN and ISDN lines volume is shown in Chart 10. A gradual increase of ISDN lines as opposed to PSTN lines can be observed.



Source: EETT, based on figures of licensed providers



Source: EETT, based on figures of licensed providers

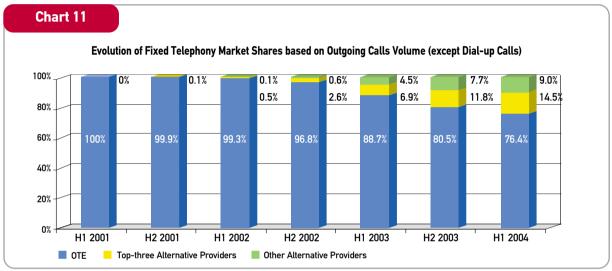


Source: EETT, based on figures of licensed providers

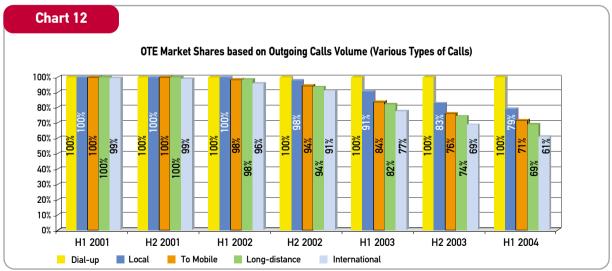
#### ii. Fixed Telephony

The competition in the fixed telephony services is enhanced, as shown by the increasing share maintained by the alternative providers (Chart 11). This share, is measured based on the volume of local, national, international and calls to mobile (except dial-up calls) and it reached for the first semester of 2004 at 23.6%. 60% of that share has been attracted by the three top alternative providers' (based on traffic data).

Chart 12 presents the evolution of the OTE share on outgoing telephone traffic<sup>2</sup>, for the various types of calls. In all types of calls, alternative providers increased their shares (except for the dial-up calls in which OTE maintains its monopoly status). More specifically, high attraction has been achieved, as demonstrated, in international calls (39%) followed by long-distance calls (31%) and calls to mobiles (29%).



Source: EETT, based on figures of licensed providers



Source: EETT, based on figures of licensed providers

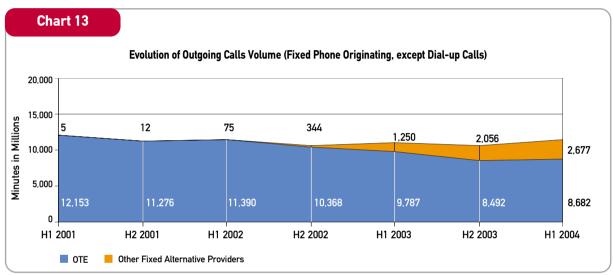
Reference to the percentage of the three top providers serves as an indication of market concentration and does not imply the existence of significant differentiation (in terms of customer base) among the 3<sup>rd</sup>, 4<sup>th</sup>, 5<sup>th</sup>, etc., providers.

<sup>&</sup>lt;sup>2</sup> Prepaid card calls not included (except for international calls case).

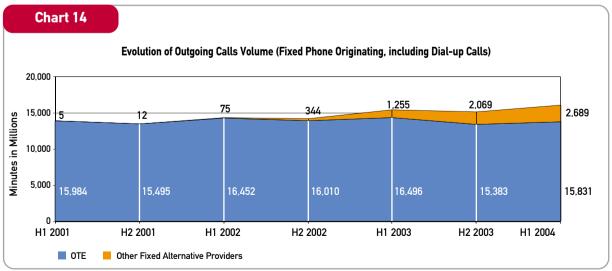
The evolution in time of the fixed telephony call-minutes volumes for OTE as well as the alternative providers is presented in Charts 13 and 14. Chart 13 includes local, national, international and calls to mobiles excluding dial-up calls. Chart 14 refers to

the same call-minutes volumes including dial-up calls.

These Charts show a significant raise in the traffic of alternative providers since 2002 and a continuous decline of OTE since 2001.



Source: EETT, based on figures of licensed providers

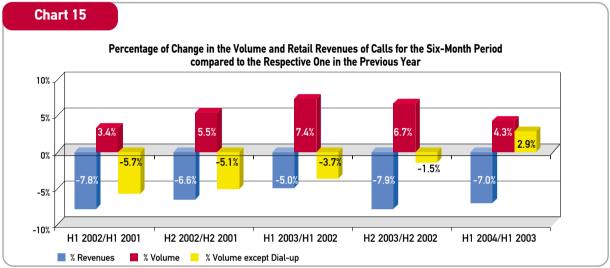


Source: EETT, based on figures of licensed providers

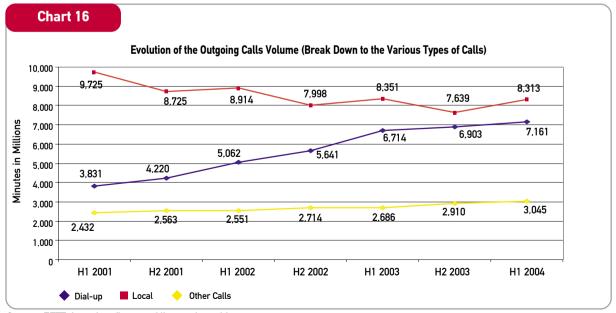
Chart 15 presents the rate of evolution of some significant data. These are the retail revenues, the call-minutes volume including dial-up calls and the call-minutes volume excluding dial-up calls sampled bi-annually. Each one of the above parameters is compared to the previous year corresponding value. A steady decline in the revenues and an upward trend in traffic is demonstrated. The latter is attributed to the

dial-up traffic. For traffic excluding dial-up, it is worth noting the increase for H1/2004 compared to H1/2003.

The allocation of the fixed-originating traffic volume to the various type of calls is shown in Table 4 and Chart 16. The 85% of the total traffic is apported to the low price calls (dial-up, local).



Source: EETT, based on figures of licensed providers



Source: EETT, based on figures of licensed providers

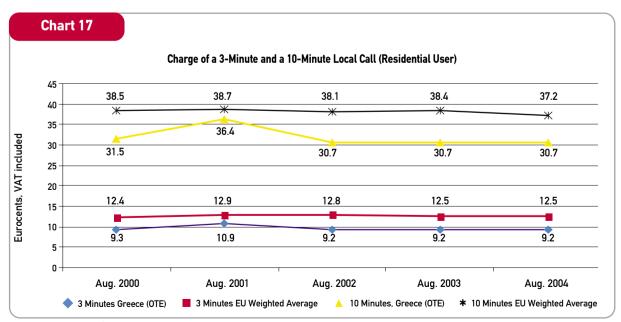
Table 4								
Evolution of the Outgoing Calls Volume from a Fixed Telephone (Break Down to the Various Types of Calls. in Millions of Minutes)								
Calls	H1 2001	H2 2001	H1 2002	H2 2002	H1 2003	H2 2003	H1 2004	
Local	9,725	8,725	8,914	7,998	8,351	7,639	8,313	
Dial-up	3,831	4,220	5,062	5,641	6,714	6,903	7,161	
Long-distance	1,152	1,188	1,178	1,218	1,237	1,312	1,375	
International	337	381	388	422	417	459	478	
To mobile	943	994	985	1,074	1,032	1,138	1,193	
Total except dial-up	12,158	11,288	11,465	10,712	11,037	10,548	11,359	
Total	15,988	15,507	16,527	16,353	17,751	17,452	18,520	

Source: EETT, based on figures of licensed providers

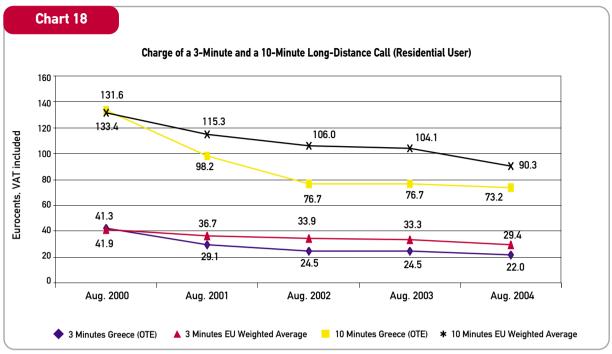
#### iii. Fixed Telephony Tariffs

Competition reinforcement resulted to further price reduction in fixed telephony (subsection 2.2.1.). Charts 17 and 18 present the evolution of the charge of a Greek residential user (OTE) compared to the EU (weighted average of former state monopolies in

the member states of the EU). The comparison is performed regarding a 3-minute and a 10-minute local and long-distance calls in the peak-hour. More specifically, in Chart 18 it can be observed that since August 2000, the cost of long-distance calls has been reduced almost at half.

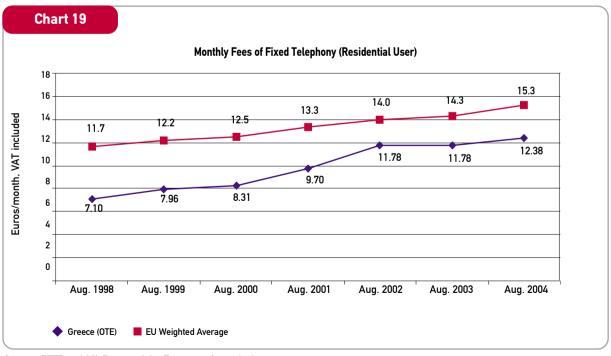


Source: EETT and 10th Report of the European Commission



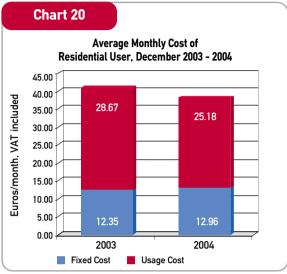
Source: EETT and 10th Report of the European Commission

As shown in Chart 19 and opposed to the above data, monthly fees for residential users kept increasing, though they are significantly lower than the EU weighted average.

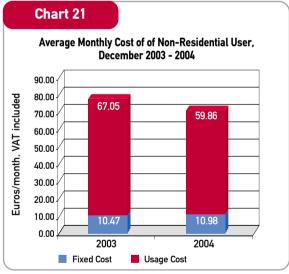


Source: EETT and 10th Report of the European Commission

These changes in fixed telephony tariffs led to the reduction of the average monthly cost for both residential and non-residential users in 2004 (Charts 20 and 21).



Source: EETT, based on OECD methodology



Source: EETT, based on OECD methodology

The data results of the above charts are based on a methodology used both by the EU and the Organization of Economic Cooperation and Development (OECD) for international tariff

comparisons. According to this methodology, the average cost is specified on the basis of a "bunch" of calls, which is defined by OECD, taking into account the basic tariff of the incumbent telecommunication provider of each member state.

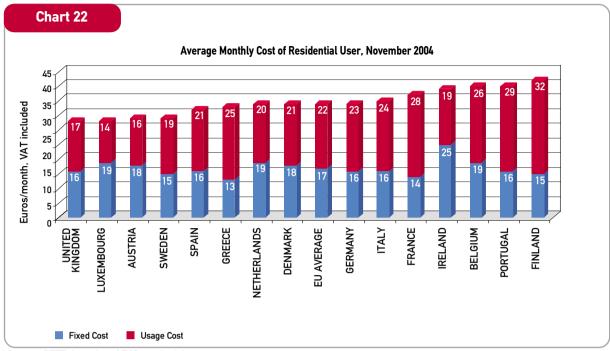
Based on the specific methodology, the annual residential user cost includes: a) The fixed cost that contains fixed fee and installation fee for a new connection (depreciated in a 5 years-time) VAT included and b) usage cost, i.e. variable cost, which is related to 1,200 national calls to fixed phones, 120 calls to mobile phones (i.e. 10% of the call-volume to fixed phones) and 72 international calls (i.e. 6% of the call-volume to fixed phones).

Regarding the non-residential user, the annual cost includes: a) The fixed cost, that contains fixed and installation fees for a new connection (depreciated in 5 years), VAT excluded, and b) the usage cost, which is related to 3,600 national calls to fixed phone, 360 calls to mobile phone and 216 international calls.

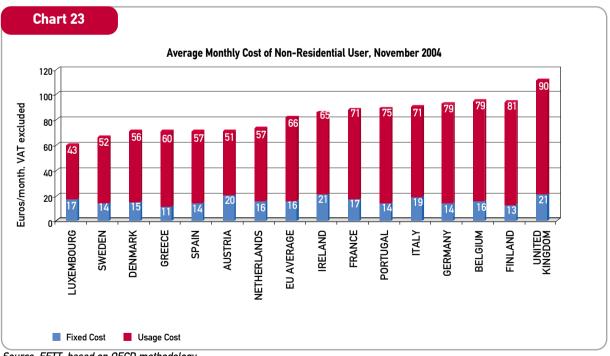
Charts 22 and 23 present a comparison between EU member states with respect to the average monthly cost for a residential and a non-residential user of fixed telephony respectively. The cost in Greece is significantly lower than the average European one both for the residential (6th more advantageous member state in 2004 from 10th in 2003) and for the non-residential users (4th most advantageous member state in 2004 from 6th in 2003).

This favorable image is differentiated taking into account the Purchasing Power Parities<sup>3</sup> of each member state. In this case (Charts 24 and 25), Greece is placed at the 13<sup>th</sup> position for residential user cost and 8<sup>th</sup> for non-residential user cost (in 2003 it held the 14<sup>th</sup> and 9<sup>th</sup> position respectively).

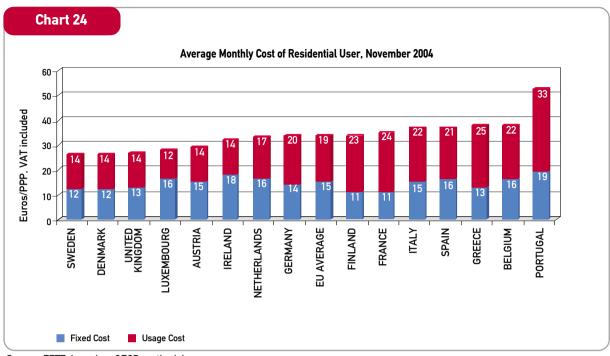
<sup>&</sup>lt;sup>3</sup> OECD Issue, December 2004 (September 2004 prices).



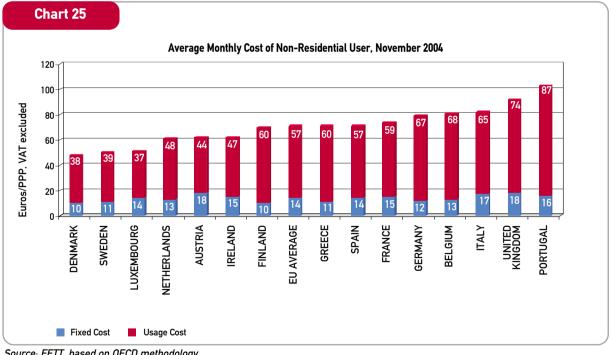
Source: EETT, based on OECD methodology



Source: EETT, based on OECD methodology



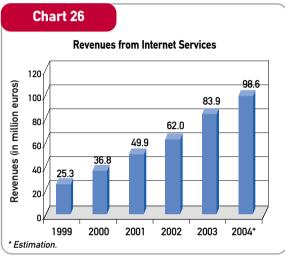
Source: EETT, based on OECD methodology



Source: EETT, based on OECD methodology

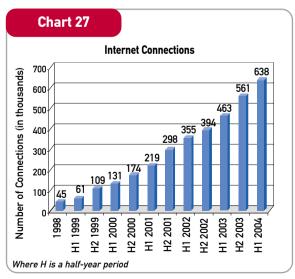
#### iv. Internet

Based on information collected from licensed providers, the Internet market in Greece keeps growing. The total retail revenues of the licensed providers that originate from Internet services are estimated at 100 million euros for 2004, showing an increase of 17% compared to 2003 (Chart 26).



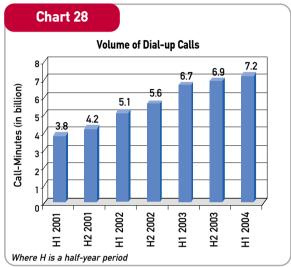
Source: EETT, based on figures of providers

This increase is aligned to the upward trend of Internet connections reported by the licensed providers. The Internet connections were 638,000 by the end of the first semester of 2004, while they were 561,000 by the end of 2003 and 394,000 by the end of 2002 (Chart 27).



Source: EETT, based on figures of providers

Moreover, an increase in the volume of dial-up call-minutes to the Internet was performed reaching at 7.2 billion minutes by the first semester of 2004, compared to 6.9 billion minutes for the second semester of 2003 (Chart 28).

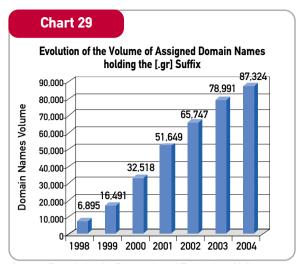


Source: EETT, based on figures of providers

#### Domain Names holding the [.gr] Suffix

The volume of the Domain Names holding the [.gr] suffix kept increasing during 2004 (87,324 on 31th December 2004 compared to 78,991 on 31th December 2003) but at lower rates compared to the previous years. This is attributed to the cleansing of unused Names, which was performed in the first semester of 2004 and resulted in the deletion of about 20,000 Names.

The volume of the new Domain Names assigned during 2004 were 32,871 (subsection 2.2.5.).



Source: Foundation for Research and Technology Hellas-Institute of Computer Science (FORTH – ICS)

#### v. Mobile Telephony

The upward course of the MTOs is attributed mainly to the high penetration of mobile telephony in Greece, that reached the 84.4% (in country population). The specific rate is calculated on the basis of active subscribers number which reached 9.3 millions, compared to 8.9 millions in 2003 (Chart 30).

Evolution of Mobile Telephony Subscribers Volume

12
10
8
6
4
2
Dec.-98 Dec.-99 Dec.-00 Dec.-01 Dec.-02 Dec.-03 Dec.-04\*

Total Number
Active Subscribers Volume

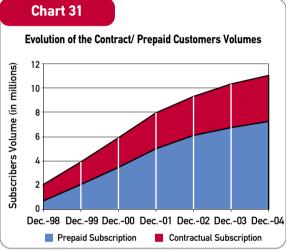
\* The volume of active subscribers for 2004 is based on an estimation.

due to the non-provision of data by TIM HELLAS Source: EETT, based on figures of MTOs

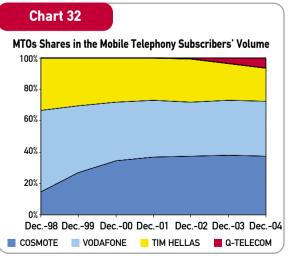
It should be clarified that the term "active subscribers" refers to all subscribers under contract or prepaid status, that have contributed to the generation of income during the last three months. The specific income may be either retail (call or SMS/ MMS etc.) or wholesale (call reception or SMS/ MMS etc.).

Chart 31 shows the evolution of the total number of subscribers as it is broken down to prepaid and contract customers. The percentage of the prepaid subscribers has reached 66% in 2004.

The allocation of the total number of subscribers to each MTO is shown in Chart 32.

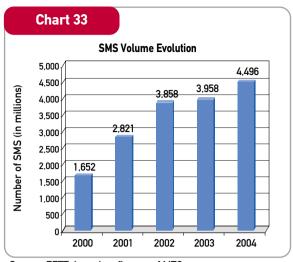


Source: EETT, based on figures of MTOs



Source: EETT, based on figures of MTOs

A significant rise in the volume of Short Message Service (SMS) has been observed, as 4.5 billion messages were sent during 2004 with a 13.6% increase of compared to 2003 (Chart 33). It is worth mentioning the emerging market of Multimedia Message Service (MMS) which reached 27 million messages during 2004 (compared to 6.7 million MMS during 2003).



Source: EETT, based on figures of MTOs

#### 1.1.4. Interconnection

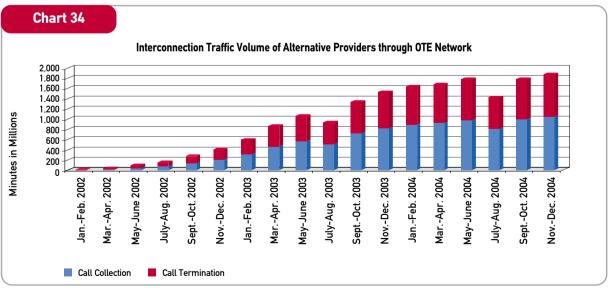
#### i. Fixed Telephony

Chart 34 presents the evolution of Interconnection volume. This volume includes: calls collection from the OTE network and calls termination to the OTE network, on behalf of fixed telephony alternative providers.

Both calls collection and termination showed a rapid increase, which reflects the higher competition in the

fixed telephony market. More specifically, the annual change (2004 - 2003) for the call collection reached 67%, while call termination 54%.

The reduction of termination calls fees, which is discussed in subsection 4.1.1., is expected to strengthen competition even more and lead to a further growth of Interconnection traffic.



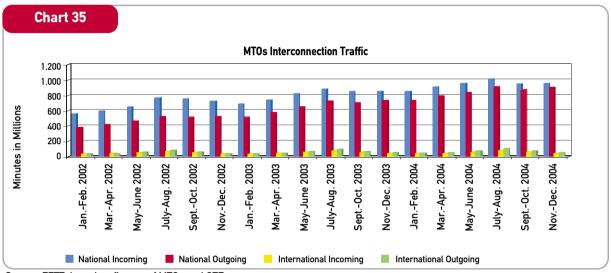
Source: EETT, based on figures of licensed providers

#### ii. Mobile Telephony

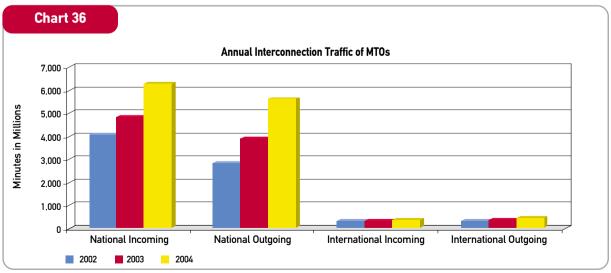
During 2004, the Interconnection traffic for MTOs showed a significant increase, as demonstrated in Chart 35. The specific chart presents the national and international Interconnection traffic (incoming and outgoing) for the four MTOs. National incoming traffic is the total traffic terminating to the network of each MTO, originating from the networks of other domestic MTOs and fixed telephony providers (OTE and alternative ones). Similarly, the national outgoing traffic is the total

traffic originating from the network of each MTO and terminates to the other domestic MTOs and fixed telephony providers (OTE and alternative ones). Likewise, International incoming and outgoing traffic refers to the total traffic which originates from or terminates to international providers.

Chart 36 presents the yearly evolution of the aforementioned types of Interconnection traffic illustrating the continuous increase in Interconnection traffic from 2002 to 2004.



Source: EETT, based on figures of MTOs and OTE



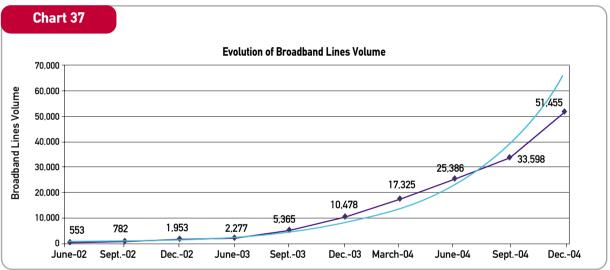
Source: EETT, based on figures of MTOs and OTE

The recent fee reduction for fixed to mobile call termination (released on 1st October 2004, see subsection 4.1.1.) is expected to further assist the Interconnection traffic increase.

#### 1.1.5. Broadband Services

#### i. Broadband Lines

Broadband access was launched in 2003 and it was significantly accelerated during 2004 (Chart 37). More specifically, the number of broadband lines was doubled in the last semester of 2004 and went 5 times up since the beginning of the year. However, this development does not compensate for the significant lag of Greece with respect to the other EU member states (subsection 4.3.1.).

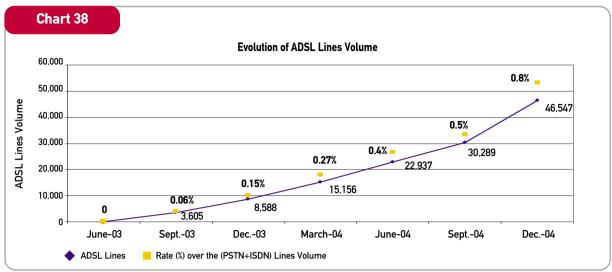


Source: EETT, based on figures of licensed providers

#### ii. ADSL Access

During 2004, a rapid increase of the number in ADSL lines was noted. This increase was more than double during the second semester, while since the beginning of the year it has increased five times (Chart 38).

In Table 5 the evolution of the ADSL lines volume is presented. The specific volumes are broken down to the various types of lines i.e. retail lines provided by OTE or alternative operators and full/shared LLU lines.



Source: EETT, based on figures of OTE

It is worth noting that the average rate of the ADSL lines over the basic telephone lines in EU exceeded the 10% in July 2004.

Table 5										
Evolution of ADSL Lines Volume										
	Number of OTE ADSL Lines	Number of ADSL of Alternative Providers	Number of Full Access LLU Lines	Number of Shared Access LLU Lines	Total ADSL Lines					
31-12-2003	7,159	774	650	5	8,588					
31-03-2004	12,958	1,419	769	10	15,156					
30-06-2004	19,789	2,056	932	160	22,937					
30-09-2004	25,680	2,974	1,158	477	30,289					
31-12-2004	37,930	5,902	1,787	928	46,547					

#### iii. Unbundled Access to the Local Loop

LLU grew in terms of the line volume, especially in the second half of 2004. As a result of this growth, the number of LLU lines reached at 2,715 by the end of 2004, compared to 655 by the end of 2003 (Chart 39). It should also be stressed that, while until March 2004 there were no Shared Access LLU lines, by the end of 2004 there were 928 lines. The specific development denotes the increasing interest of the alternative providers in LLU as well as the constructive effects of the respective EETT interventions.

The recent modification of LLU fees (subsection 4.3.2.) is expected to further reinforce the LLU market growth.

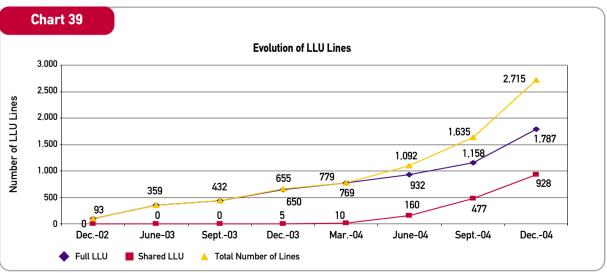
#### 1.2. Postal Services

#### 1.2.1. The Courier Services Market

The Courier Services market in Greece keeps growing at high rates. This can be confirmed by the increase in market figures, such as the volume of postal items handled and the number of the sector's employees.

In total, the number of undertakings operating in the Courier market for 2000 - 2004 showed a weighted average increase of 13% on an annual basis. At the end of 2004, 266 undertakings (compared to 176 in 2000) were registered with EETT's Postal Undertakings Registry, holding a General Authorization for the Provision of Postal Services, a regime under which Courier services are mainly provided.

More specifically, 77 declarations for the provision of services under a General Authorization and 2 applications for Individual Licences were submitted to EETT in 2004, the first already approved and the second still at the stage of evaluation.



Source: EETT, based on figures of licensed providers

It is noted that the Individual Licence is required for the provision of services within the scope of the US, yet not included in the exclusive rights of the Universal Service Provider (USP). Moreover, the General Authorization is required for the provision of services not referring to any of the above cases, mainly being the case of Courier services. Regarding the geographic allocation of postal undertakings holding a General Authorization, it is observed, according to Table 6, that 41.5% of undertakings are based in the Region of Attica, followed by the Region of Central Macedonia, in terms of geographic concentration of undertakings, where 16.3% of the undertakings is based.

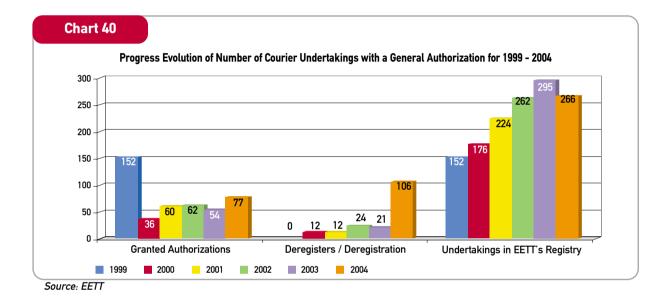
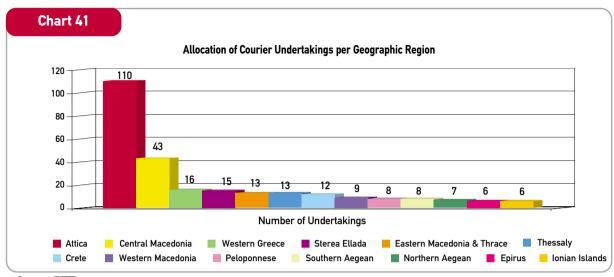


Table 6							
Allocation of Courier Undertakings per Geographic Region							
Geographic Region	Number of Undertakings	Percentage %					
Attica	110	41,5					
Central Macedonia	43	16,3					
Western Greece	16	6,0					
Sterea Ellada	15	5,6					
Eastern Macedonia & Thrace	13	4,9					
Thessaly	13	4,9					
Crete	12	4,5					
Western Macedonia	9	3,4					
Peloponnese	8	3,0					
Southern Aegean	8	3,0					
Northern Aegean	7	2,6					
Epirus	6	2,3					
Ionian Islands	6	2,3					
TOTAL	266	100					



Source: EETT

It is also worth noticing that 80% of all undertakings operating in the Courier market hold a Local General Authorization, with 36% of them being based in the Prefecture of Attica (also see Table 7). Moreover, 18.5%

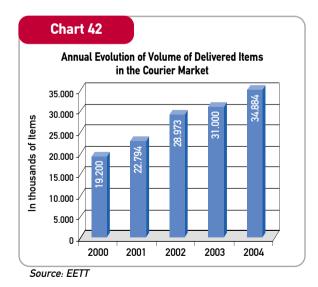
of undertakings have a Regional General Authorization, with 60% of them operating in Attica. Finally, 1.5% of all undertakings hold a National General Authorization and are based in the Prefecture of Attica.

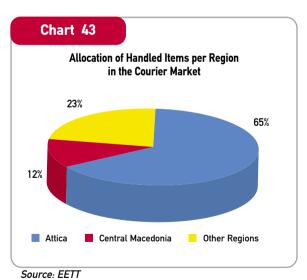
Table 7						
Allocation of Courier Undertakings per Geographic Region and Type of Licence						
Geographic Region	Number of Undertakings	Local General Authorization	Regional General Authorization	National General Authorization		
Attica	110	76	30	4		
Central Macedonia	43	36	7	0		
Western Greece	16	14	2	0		
Sterea Ellada	15	15	0	0		
Eastern Macedonia & Thrace	13	13	0	0		
Thessaly	13	12	1	0		
Crete	12	11	1	0		
Western Macedonia	9	4	5	0		
Peloponnese	8	6	2	0		
Southern Aegean	8	8	0	0		
Northern Aegean	7	7	0	0		
Epirus	6	6	0	0		
Ionian Islands	6	5	1	0		
TOTAL	266	213	49	4		

Table 8						
Allocation of Courier Undertakings per Provided Service						
Type of Provided Service	Number of Undertakings	Percentage (%) of Total Undertaking with a General Authorization				
Courier services for postal items except for domestic parcels	235	91%				
Courier services for postal items except for international parcels	201	78%				
Courier services for domestic parcels (up to 20kg with or without commercial value)	241	94%				
Courier services for international parcels (up to 20kg with or without commercial value)	204	79%				
Preparation of postal items	181	70%				
Transfer of non-addressed promotional material	129	50%				
Exchange of documents	114	44%				

The number of items handled by Courier undertakings in 2004, is estimated at 35 million<sup>4</sup>, compared to 31 million in 2003 and 19.2 million in 2000 (Chart 42). 90% were domestic items, while 10% were international

items, either incoming or outgoing. The largest traffic volume was demonstrated in the Region of Attica, with 65% of items and the Region of Central Macedonia with 12% (see Chart 43).





<sup>&</sup>lt;sup>4</sup> The volume of delivered items was estimated using data for the first nine months, by reduction to the year.

It should also be noted that the average growth rate of items in 2000-2004 stood at 16.3%.

The Courier market kept showing a high degree of concentration in 2004, remaining at the same levels of 2003. It is worth noticing that 88% of the total postal items volume was delivered by only 10 undertakings, and that 5 of them delivered 78% of items.

Also in 2004, the employees in Courier undertakings stood at 8,564 full time and 1,756 part time.

#### 1.2.2. Universal Service Mail Traffic

In the period 1999 - 2004, the volume of handled postal items under the US showed a continuous increase (641.3 million in 2004 compared to 533.5 million in 1999), with an average annual rate of 3.8%.

According to information submitted by the USP to EETT in March 2005, universal services seem to have demonstrated a total increase in volume of 4.44% compared to 2003. More specifically, it is estimated that the volume of domestic mail increased by 6.03% in 2004 compared to 2003. The international mail volume is estimated to have reduced by 4.53%, while in the case of parcels it is estimated to have increased by 5.57% (Tables 9 and 10).

Universal Service Mail Traffic 1999-2004							
	1999	2000	2001	2002	2003	2004*	
Total Number of Postal Items	533,524,593	571,786,808	582,212,123	598,441,707	614,054,700	641,294,200	
Annual Percentage							
Change	-	7.2%	1.8%	2.8%	2.6%	4.4%	
Change since 2000	93.3	100	101.8	104.6	107.2	111.6	

Table 10			
Average Per	centage Change in the Volum	ne of US Items, 2001-2004	•
Comince*			
Services*	2001 - 2002	2002 - 2003	2003 - 2004
Domestic Mail	4.2%	6.4%	6.0%
International Mail	-6.3%	-15.5%	-4.5%
Parcels	-6.8%	-14.0%	5.6%
Including all US services			

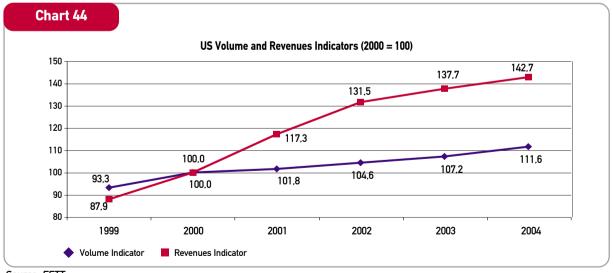
Source: ELTA

It is noted that the US includes the collection, transport, sorting and distribution of postal items up to 2kg, the collection, transport, sorting and distribution of postal parcels up to 20kg and the services of registered mail as well as items with a declared value.

#### 1.2.3. Universal Service Revenues

According to information submitted by the USP to EETT in March 2005, universal services showed an increase in revenues of 5% compared to 2003. For the period 1999 - 2004, the average annual growth rate of turnover stood at 11.3%.

Table 11						
	Unive	rsal Service Re	venues 1999 - :	2004 (euro)		
	1999	2000	2001	2002	2003	2004*
Total Revenues	224,974,591	255,842,692	300,042,840	342,546,634	363,895,486	382,000,000
Annual Percentage Change	-	13.7%	17.3%	14.2%	6.2%	5.0%
Change since 2000	87.9	100.0	117.3	131.5	137.7	142.7
* Figures by estimate of the USP						



Source: EETT

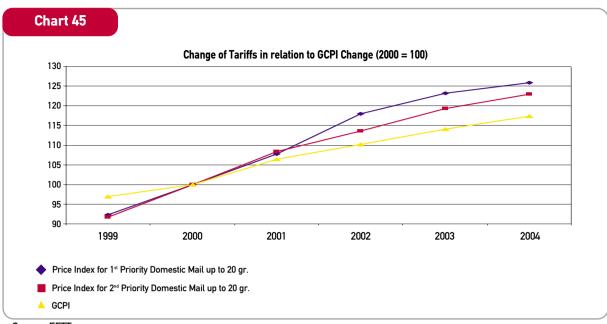
#### 1.2.4. Universal Service Tariffs

This subsection presents the evolution of USP (currently being ELTA) tariffs for the provision of US, for the most important services and in particular for 1<sup>st</sup> and 2<sup>nd</sup> Priority Domestic mail up to 20gr., in relation to the evolution of the General Consumer Price Index (GCPI)<sup>5</sup> (see Tables 12 and 13, and Chart 45).

Table 12					
Annual Percentage Change of Tariffs in	relation to	GCPI (1999	- 2004)		
	2000/1999	2001/2000	2002/2001	2003/2002	2004/2003
1st Priority Domestic Mail up to 20 gr.	8.3%	7.7%	9.5%	4.4%	4.3%
<b>2</b> <sup>nd</sup> <b>Priority Domestic Mail</b> up to 20 gr.	9.1%	8.3%	4.8%	5.0%	4.8%
GCPI	3.1%	3.4%	3.6%	3.5%	2.9%

Table 13							
Change of Tariffs in relation to GCPI Change (2000 = 100)							
	1999	2000	2001	2002	2003	2004	
1st Priority Domestic Mail up to 20 gr.	92.31	100.00	107.69	117.95	123.19	125.90	
2 <sup>nd</sup> Priority Domestic Mail up to 20 gr.	91.67	100.00	108.33	113.58	119.26	122.90	
GCPI	96.99	100.00	106.40	110.2	114.1	117.4	

 $<sup>^{\</sup>rm 5}$  As calculated by the National Statistical Service of Greece (NSS).



Source: EETT

### **FOCUSING ON CONSUMERS**



### 2. Focusing on Consumers

In this Chapter we present EETT's actions for the protection of consumers, as well as the establishment of a proper mechanism to handle issues of concern, related to the telecommunications and postal services provided.

Also, reference is made to the various benefits arising from the establishment of competition in the telecommunications sector, emphasizing on the increase of offered options and the reduction in the cost of services. In this context, information is included as regards offered services in the telecommunication market, such as Number Portability. In parallel, a new application created by EETT, constituting a useful tool for the comparison of various programs and the respective fixed and mobile telephony tariffs, is presented.

Moreover, the actions of EETT are stated for the efficient implementation of the new Regulatory Framework and the control of postal undertakings, to safeguard consumers rights.

#### 2.1. Consumer Service Sector

2004 was the second year of operation of the Consumer Service Sector (CSS), its top priority being to safeguard the rights and interests of consumers of telecommunications and postal services.

The main actions of the CSS are:

Informing the consumers about telecommunications and postal services issues, such as the options and facilities available.

- Immediate processing of requests/ complaints received on a daily basis and resolution of arising issues.
- Identification of issues which might need regulatory intervention, as these arise from consumers requests/ complaints.

Consumers may contact the CSS either on the phone at 801 11000 80, or in writing via mail, fax or email. All written requests/ complaints are recorded in a special electronic database (Consumers Service System), which among others enables the follow-up of all processing stages of issues, the method of resolution, as well as their quantitative and qualitative analysis. Accordingly, phone requests / complaints are classified by subject in order to reach useful conclusions in terms of consumers concerns.

To facilitate consumers and provide full information, EETT has created a special Section on its website addressing consumers. This Section:

- Provides information about CSS and the methods in which consumers can address their enquiries or complaints about telecommunications or postal services.
- Provides a special form to be filled in for requests/ complaints.
- Enables comparative presentation of tariffs pertaining to programs of fixed and mobile telephony use of all providers.
- Presents all the brochures issued by EETT with useful information about subjects of interest for consumers.

In 2004, the CSS received 1,965 written requests/complaints of consumers in relation to telecommunications and postal services, whose classification by subject is presented in Table 14 (compared to 2003) and Chart 46.

Table 14							
Classification of Requests/ Complaints from Consumers, 2003 - 2004							
Classification Category	Classification Category 2003 2						
	(%)	(%)					
Telecommunications Services (total)	95	90					
Spectrum	35	54					
(antennas and interferences)							
Internet	29	7					
(availability and tariffs)		,					
Mobile Telephony	15	10					
(availability of services, tariffs, quality)	13	10					
Fixed Telephony	14	18					
(availability of services, tariffs, quality)							
Domain Names holding the [.gr] suffix	2	1					
➤ Postal Services	3	2					
➤ General Information	2	8					

Chart 46 Classification of Consumers' Written Requests/ Complaints 01-01-2004 to 31-12-2004 Internet Mobile Telephony **7**% 10% General Information Domain 8% Names [.gr] Fixed 1% Telephony 18% Postal Services Radio Spectrum 2%

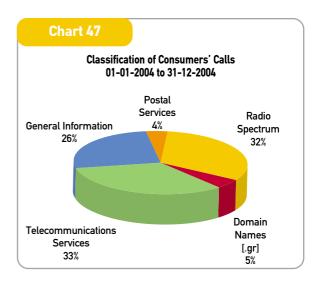
In the case of spectrum, almost all subjects were related to mobile telephony Antenna Mast Constructions and interferences. As regards the Internet, most subjects were associated with the availability of those services and charges.

In mobile and fixed telephony, the majority of requests/ complaints focused on quality issues of the services offered, disputed bills, providers obligations and availability of specific services.

Also, there was a large amount of requests of general interest mainly related to the options provided to consumers and EETT actions. Consumers showed great interest in Number Portability of fixed and mobile telephony, and also Carrier Selection and Pre-selection.

As regards postal services, the requests/ complaints focused on issues of quality of services and the compliance of postal undertakings with their obligations.

Moreover, the EETT Help Line received 2,932 calls in 2004, displaying an increase of 25% compared to 2003. Classification of calls by subject is shown in Chart 47.



The above show that consumers make use of the mechanisms created by EETT to safeguard their interests, obtain information, compare and claim their rights, taking up a leading role in the telecommunications and postal market.

# 2.2. Telecommunications - Radiocommunications

#### 2.2.1. Benefits due to the Competition

The establishment of competition in the telecommunications sector has brought various benefits to consumers with the most important being the increase in options and the reduction in the cost of services.

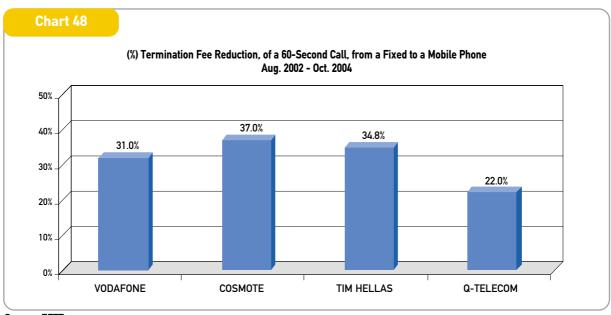
In fixed telephony, alternative providers strengthen their presence through the provision of various packages and services, thus increasing consumer options. According to June 2004 relating data, consumers could select among at least 9 alternative

providers. EETT promoted the consumer options through actions, such as the information campaign regarding the Number Portability and the creation of web-pages with comparative presentation of fixed and mobile telephony tariffs.

Moreover, consumers have increased options regarding broadband access to the Internet. By the end of 2004, 8 providers already were offering packages for Internet access based on ADSL or SDSL.

In parallel with the options increase, consumers benefit from reductions in telephony tariffs.

In mobile telephony, recent reductions in termination fees brought a significant financial benefit to consumers, since the corresponding reductions are reflected to the retail tariffs. Chart 48 presents the overall percentage reduction in termination fees for the period from August 2002 - October 2004. The specific fee refers to a 60-second call from a fixed to a mobile phone.



Source: EETT

In fixed telephony, the intense competition led to further reductions in tariffs. In 2004, providers changed their pricing policies, introducing charge zones and special discount packages. As a result of these changes, prices were reduced for almost all calls, especially for calls to mobile phones.

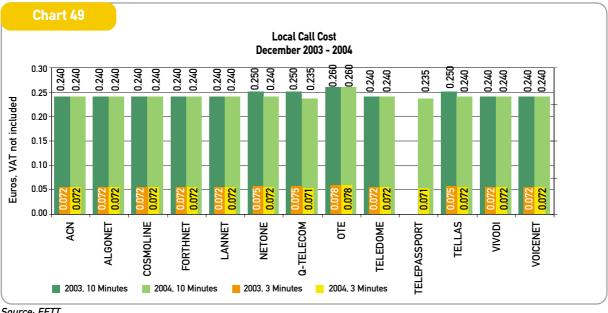
The pricing policy of all the fixed telephony providers is compared at two time-instants (December 2004 and December 2003). The cost of the various types of calls (local, long-distance, international calls and calls to mobile phones) in the peak hour is compared. The presented data refer to the basic programs of each provider. Special discount programs (fixed or free call time) were not included in this study.

Chart 49 presents the actual cost of a 3-minute and a 10-minute local call in the peak hour. Most providers charge per minute for the first two minutes of the call and per second after that period. It is also worth noting that, several providers use minute-based charges.

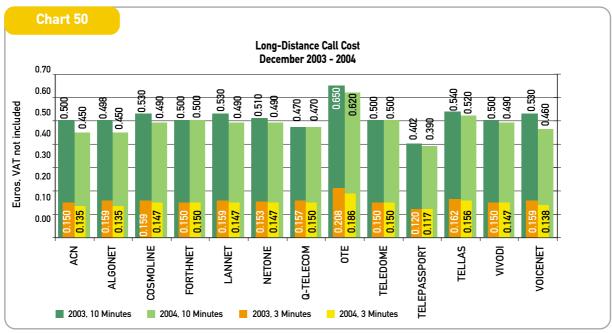
Respectively, the cost of a 3-minute and a 10-minute long-distance call (peak hour) is shown in Chart 50. It is noted that regarding the specific calls performed in the peak hour, all providers charge per one second.

Chart 51 presents the average weighted cost of an 1minute call from a fixed to a mobile phone for two time-instants (December 2004 and 2003). The average weighted cost was calculated on the basis of the actual cost for an 1-minute call to all four Mobile Telephony Operators (MTO), using some weighting coefficients. The specific coefficients are the market shares in terminating calls held by each MTO. The MTOs terminating call volume was calculated based on fixed providers originating traffic for the aforementioned periods. It is noted that the cost of a call to mobile phone includes a minimum charge, which is in general 30 seconds, while the charging step beyond that threshold is usually per one second.

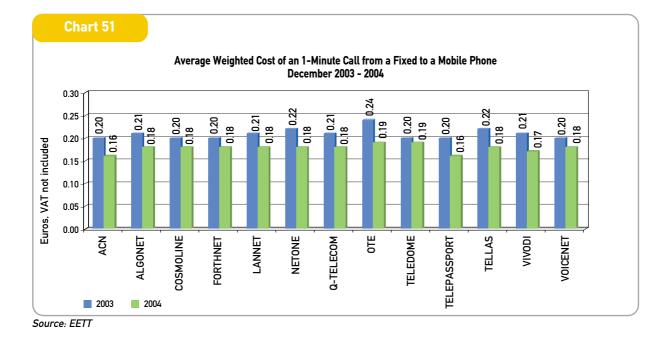
The resulting average weighted cost for each fixed telephony provider shows a significant change from 2003 to 2004, ranging from 3% to 20% depending upon the case.



Source: EETT

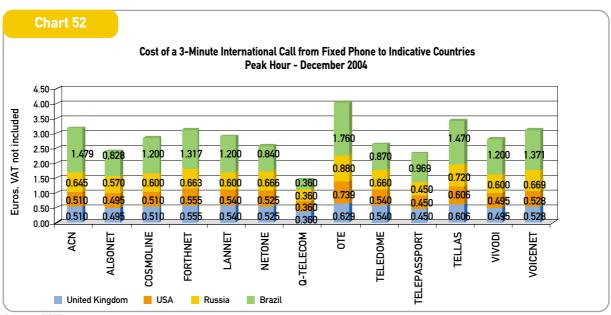


Source: EETT



Regarding the international calls, each provider uses different charge zones. However, there are not any significant differences in the countries "bunch" that compose these zones of each provider.

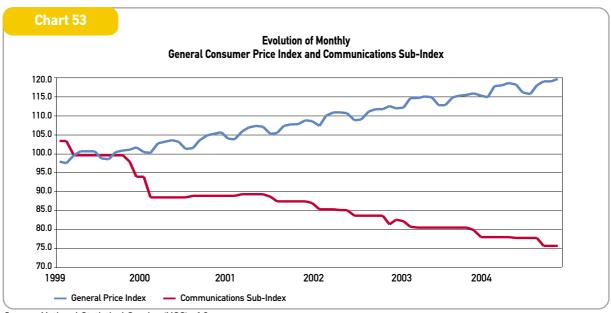
Indicatively, Chart 52 shows the cost for a 3-minute international call to fixed phone terminating to UK, USA (usually in the same charge zone with UK), Russia and Brazil.



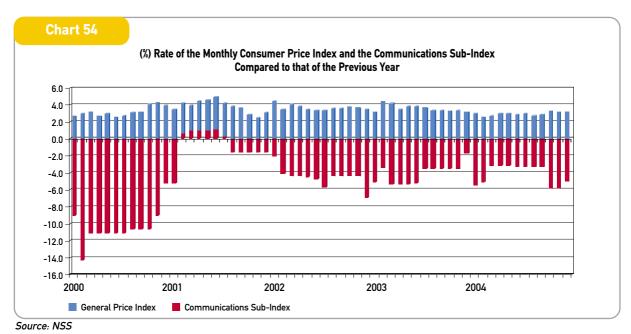
Source: EETT

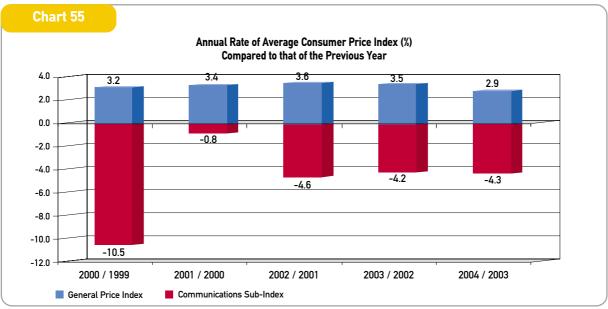
These reductions and the resulting benefits for the consumers are reflected in the growth of the Consumer Price Index (CPI) over time (Charts 53, 54 and 55). The CPI, which is calculated on a monthly basis by the National Statistical Service of Greece (NSS), is used for the calculation of the general level of prices for goods and services purchased by the average household.

The CPI consists of individual indices (Sub-indices), which measure the level of prices for goods and services of certain categories. One of these is the Communications Sub-index, which is mainly (by 98%) related to the fixed and mobile telephony fees. The remaining 2% covers postal services (0.7%), telephone equipment (0.6%) and telegrams (0.7%).



Source: National Statistical Service (NSS) of Greece





Source: Based on figures of the NSS

#### 2.2.2. Carrier Pre-Selection

Carrier Pre-Selection (CPS) was launched in Greece in the first semester of the year 2003 towards contributing to consumer facilitation. The specific service enables the consumers to select an alternative provider to permanently process one or more categories of calls (international, local, longdistance and calls to mobile phones).

More specifically, the options available to consumers are:

Option 1¹: International calls.

Option 2¹: Long-distance calls and calls to mobile phones.

International, long-distance Option 1&2: and calls to mobile phones.

All call types. Option 3:

<sup>&</sup>lt;sup>1</sup> It should be clarified that consumers can select at the same time Option 1 and Option 2 by different providers.

It should be reminded that when using CPS no dialing of a special code before each call is required (as in the case of Carrier Selection).

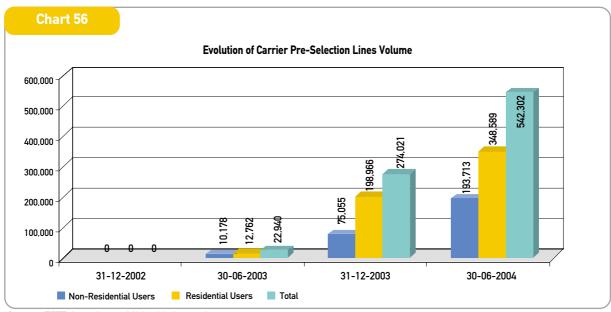
The penetration of the above service is shown in Chart 56. The total number of carrier preselection lines exceeded 540,000 within less than 18 months from its launch.

Aiming at further enhancing CPS, EETT, made a modification of the relevant Regulation in December 2004 (subsection 4.1.3.). According to this Regulation, CPS applications submission procedure is simplified. Moreover, it enables electronic or phone submission of the applications. It is noted that according to the new Regulation, all types of applications related to CPS (activation/ cancellation/ change of provider or preselected call categories) have to be submitted to the specific provider that the consumer wishes to preselect.

In parallel, significant measures towards protecting consumers from unethical practices have been taken. Providers are obliged to jointly prepare an Ethics Code, which should also cover issues regarding their resellers' policy.

#### 2.2.3. Number Portability

Number Portability is an option available to consumers. According to this option consumers may keep their number while changing their provider. NP for mobile customers was launched on 1st March 2004 signaling the commencement of a new period in the telecommunication market. The specific service is supported by a special database (National Reference Database on Number Portability-NRDNP), which facilitates the NP implementation by the providers. The commencement of the NRDNP use for the fixed telephony numbers performed on 1st June 2004 acting as a catalyst for the growth of the specific market. It is noted that the obligation for NP in fixed telephony market existed since the beginning of 2003.



Source: EETT, based on published balance sheets

Prior the NP launch, telephone numbers were bundled to the telecommunications provider's network. This constituted an important limitation to the development of competition, since consumers who wished to change provider also had to change their numbers. Portability resolves this limitation and phone numbers are assigned to the subscribers.

From this new option, there are multiple resulting benefits for the consumers:

- The ten-digit number is owned by the consumer, who can now freely select the provider according to his/her preference. The consumer is not subject to any additional burdening to notify everybody who calls him/her, in the hypothetical case of number change.
- Strengthening of the consumers' position, since the consumers may select among the most advantageous services according to their personal needs.
- In order to attract new subscribers and retain existing ones, providers improve the variety, quality and prices of offered services.

All fixed and mobile telephony subscribers may request NP (including those having prepaid subscription) whenever they wish, unless they have been subject to suspension due to unpaid debts.

Subscribers that wish to use the specific service, have to contact the new provider (recipient provider). They submit an NP application and conform to the appropriate procedure in order to be connected to the new provider (contract signing etc.). The new provider is responsible to forward the application, to notify the old provider (sender provider) about NP as well as and the connection interruption and finally to take the necessary actions for NP. The old provider checks the

subscriber's identity verifying the agreement of information on the application. Processing of a fixed telephony NP application should be completed no later than 10 days from submission. In the case of mobile telephony the specific period cannot exceed 15 working days.

In the case of MTOs, the procedure for submission of Portability applications is activated with a free call from a mobile phone to a special 5-digit number:

COSMOTE: 13897
 Q-TELECOM<sup>2</sup>: 13822
 TIM HELLAS: 13846
 VODAFONE: 13894

It is noted that relevant Hearings were held in September 2004 by EETT, regarding compliance of the four MTOs with the NP Regulatory Framework. The results of the specific Hearings are expected by the beginning of the next year (subsection 4.1.4.).

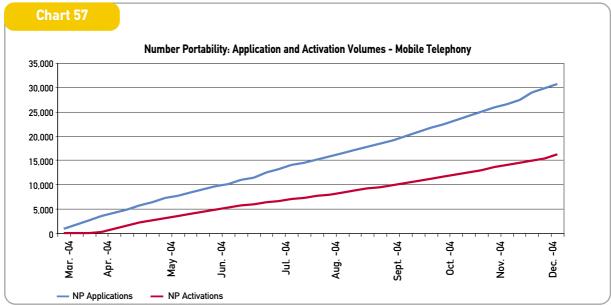
The NP fees that have to be paid by the subscriber depends on the commercial policy of each provider. Therefore, there are providers who do not charge subscribers in order to facilitate the NP. Moreover, providers may readjust this fee. In the case of mobile telephony, upon introduction of NP, the retail fees specified by the three largest MTOs were at 30 euros (VAT included), while in December 2004, (i.e. 10 months after the NP launch based on the NRDNP), the fee was reduced, though differentiated among the providers, with the maximum being 21 euros (VAT included). In the case of fixed telephony, the majority of providers does not charge consumers.

The evolution of the NP application and activation volumes is shown in Charts 57 and 58, for mobile and fixed telephony respectively. Moreover, the Chart 59 presents the volume of NP activations per month. In

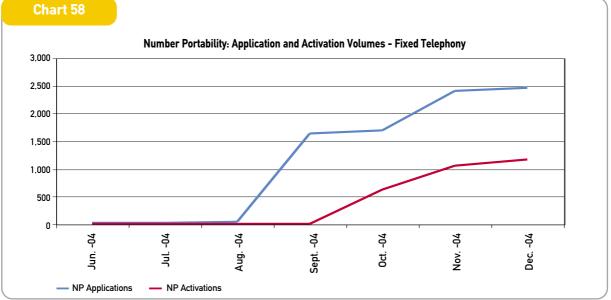
<sup>&</sup>lt;sup>2</sup> Additionally, Q-TELECOM implements the NP application submission procedure through its retail network (authorized representatives).

the case of mobile telephony since NP launch until end of 2004, 30,637 applications have been submitted and 16,123 numbers have taken advantage of the NP. In the case of fixed telephony 2,498 applications have been submitted and 1,156 NP activations have been performed. According to information from providers,

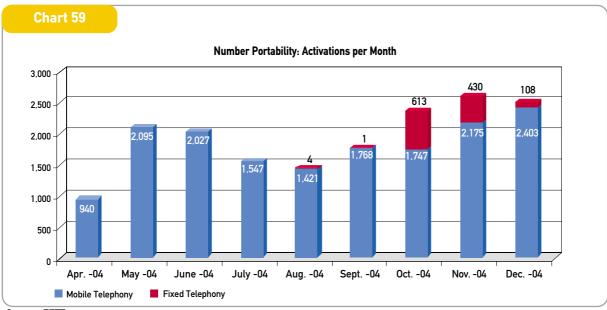
the observed differences are mainly due to inconsistency or lack of information between the old and the new provider regarding the applicant subscriber, which resulted to application rejection. EETT reviews the specific problem in the context of the aforementioned MTOs Hearings.



Source: EETT



Source: EETT



Source: EETT

Consumer briefing regarding the NP functionality, available options and the resulting benefits comprises the most important factor towards NP development. In December 2004, EETT held an information campaign all over Greece through radio commercials towards informing the consumers with respect to their ability to keep their numbers when changing providers. It also created a special webpage (www.mynumber.gr) where detailed information about the above issues is provided. The first indications show that the campaign contributed significantly to the increase of NP applications.

#### 2.2.4. Universal Service

The term Universal Service (US) means the provision of a set of predetermined, basic telecommunications services at affordable prices to all citizens in Greece, regardless of their geographic location.

In the context of its responsibilities, EETT had already specified<sup>3</sup> since 2002 those services that at least have

to be provided in the framework of the US to the citizens. In the same specification the technical characteristics of the quality of those services are included. More specifically, these services are:

- Connection to the fixed public telephone network<sup>4</sup> and access to fixed telephony services, so that users can perform and receive local, national and international calls and make use of fax and data services.
- Access to a directory service on a 24-hour basis and release of a directory (Comprehensive Directory) in printed and/ or electronic form, including all registered fixed and mobile telephony numbers.
- Public phones, which can meet the reasonable needs of users, in terms of their volume and geographic coverage.
- Subscriber service.
- ➤ Free access to emergency services, using the code 112 or other emergency codes.
- Special arrangements for disabled people or special social groups by means of free time, discounts, free calls, etc.

<sup>&</sup>lt;sup>3</sup> Decision 255/83/2002, GG Issue 874/B/12-07-2002.

<sup>&</sup>lt;sup>4</sup> Except for Integrated Services Digital Networks (ISDN) and broadband access.

Furthermore, the Universal Service Provider (USP) commits itself to retain specific quality indicators in terms of time of initial connection installation, frequency of faults and time of restoration, failed calls rate and time of restoration, response time regarding directory services, complaints in case of possible errors in bills and the percentage of public phones in operation. Moreover, the USP must provide, among others, the options of selective call barring for outgoing calls, calling line identification and call diverting.

It should be noted that until December 31th 2005, OTE5 has been assigned the competent USP.

The USP must submit an annual report to EETT regarding US provision. According to the 2004 report for, the situation by the end of the year was:

- 2.133 pending applications for connection to the fixed public telephony network due to lack or need for network upgrading.
- ➤ 617 subscribers were connected to analog switching centers and therefore could not subscribers have all of the network facilities.
- 64,609 subscribers could not use data services at speeds over 9.6 Kbps. The majority of those subscribers was connected to PSTN through PCM-4 systems. These systems are replaced gradually by the USP.
- ▶ 64,105 public phones had been installed by the USP, corresponding to 0.58 common use phones per 100 residents.

Table 15 shows the evolution of the aforementioned figures during the last two years.

Table 15							
Universal Service Figures							
	31-12-2003	31-12-2004					
Pending applications for connection to the fixed public telephony network due to lack or need for network upgrading.	1,541	2,133					
Subscribers volume connected to analog switching centers and therefore could not have all of the network facilities.	18,093	617					
Subscribers volume who cannot have data services at speeds over 9.6 Kbps.	227,190	64,609					
Volume of public telephones installed by the USP.	64,493	64,105					

According to these data, there is progress in accomplishment of the relevant obligations by the USP. The main drawback is related to service provision and release of the Comprehensive Directory Effort is paid towards resolution of this drawback (subsection 4.5.3.).

In the context of its responsibilities, during 2005, EETT will continue its efforts to ensure effective provision of high quality telecommunications services at affordable prices for all subscribers in the country, thus contributing, to the social cohesion strengthening.

<sup>&</sup>lt;sup>5</sup> EETT Decision 264/140/2002, GG Issue 1368/B/24-10-2002.

#### 2.2.5. Domain Names

In April 2004 a new method assigning the Domain Names holding the [.gr] suffix was launched. The specific method is based on the operation of the "Registrants-Registrars-Registry" scheme, according to the relevant EETT Regulation. The new procedure is faster and more flexible. Moreover, the deadlines are shorter and less documents are required. The document forwarding can be performed electronically.

Through this new scheme, every interested party can now register, renew or transfer<sup>7</sup> a Domain Name, addressing the Registrar of its preference. Applications are submitted in real time and forwarded for approval to EETT immediately through an online connection.

It is noted that Registrars are the Internet Service Providers (ISPs) or other bodies undertaking the assignment of Names. The list of Registrars has been published on EETT's website. Furthermore, the Registry is the responsible agent for the management and operation of the domain [.gr]. Its responsibilities include, among others, the maintenance of databases with information about Name registration and assignment.

The assignment procedure is the following:

The Registrant submits the assignment application to the Registrar of his/her choice. A reference application is available at EETT website<sup>9</sup>.

- The Registrar diverts the specific application to the Registry, which assigns a record number to it.
- Within 15 days from application dispatch, the application for Name assignment is approved or rejected by EETT.

According to an EETT Decision<sup>10</sup>, the fees paid by the Registrant should not exceed the following amounts:

- 44 euros for name assignment and transfer, plus VAT.
- 29.30 euros for Name renewal, plus VAT.

The above amounts include the fees paid by the Registrar for the Registry operating cost (11.8 euros).

The new assignment scheme respects completely:

- Consumers' rights.
- Registrants' Personal Data, given that publication of any personal information is not allowed without their consent.
- Third party rights, such as rights on brands, trade names, etc. Each affected party may intervene prior to or after the assignment of the Name, asking for its rejection or deletion, respectively. In 2004, EETT reviewed some cases of relevant complaints in the context of Hearings.

Chart 60 presents the evolution of the volume of the requested and assigned Domain Names. Accordingly, Chart 61 shows the evolution of percentage assignment over the applications submitted.

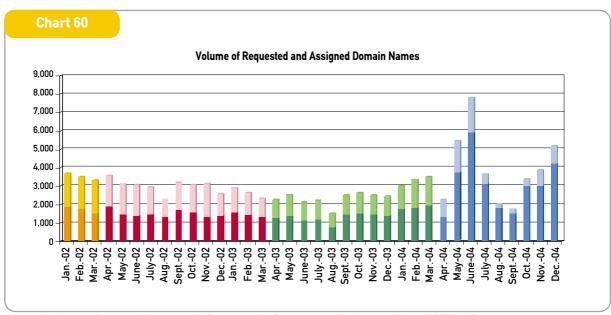
<sup>&</sup>lt;sup>6</sup> "Regulation on the Management and Assignment of Domain Names holding the .gr suffix" EETT Decision Ref. No. 268/73/2002, GG Issue 1617/B/31-12-2002, as modified by means of EETT Decision 310/16/2004, GG Issue 558/B/02-04-2004.

<sup>&</sup>lt;sup>7</sup> It is noted that the transfer of Names requires the submission of relevant statements of the old and new Registrar to the Registrant as well as the subsequent Decision of EETT, within 10 days from the date of submission. In the case of a Registrant change, a Registrar application must be submitted to the new Registrant, together with the approval of the previous Registrant and exchange of documents and data between Registrants.

<sup>8</sup> www.eett.gr, (available only in Greek).

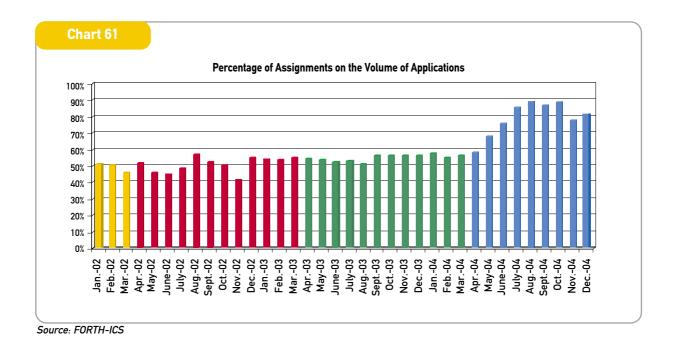
<sup>&</sup>lt;sup>9</sup> www.eett.gr, Section Telecommunications/ Domain Names.

<sup>10</sup> EETT Decision 309/48/2004, GG Issue 525/B/23-03-2004.



Source: Institute of Computer Science of the Foundation for Research and Technology Hellas (FORTH-ICS)

Note: The Chart uses different colors to present the various years starting from April (new scheme launch). Lighter colors present applications volume, while darker ones present Names volume.



A reduction in applications was noted during the period April 2003 to March 2004. This may be attributed to possible market uncertainty regarding the new assignment framework that was launched in December 2002. Nevertheless, the situation changed radically since May 2004 (a while after the commencement of operation of the new scheme) when an increase of the applications volume was displayed. Accordingly, the percentage of assignments started increasing gradually, reflecting the improvement brought by the new scheme of the Domain Name assignment procedure.

The effective operation of the new scheme will contribute to the further increase of the Names volume, the invigoration of the Greek Internet market and the maximization of the benefits offered to the users.

### 2.2.6. Presentation of Fixed and Mobile Telephony Tariffs on EETT's Website

The deregulation of the telecommunication market created plenty of options, both in fixed and mobile telephony. As a consequence the consumers often need to compare various programs and the respective tariffs offered. Taking into account that informing consumers in the best way is one of EETT's main objectives, EETT responded to the above consumer need by creating a new useful tool on its website (available only in Greek in the Section Consumers/Tarrifs Presentation), where fixed and mobile telephony programs are presented.

In the mobile telephony Section, visitors can select among various programs and obtain general information, such as monthly fee, privileged monthly fee (applied after the first year), free air-time and SMS cost (national/international). In parallel, through the sited hyperlinks, visitors can obtain information about

charges applied to various call categories, and in particular about calls to fixed and mobile phones (depending on the terminating network) and international calls (depending on the terminating country)<sup>11</sup>.

The fixed telephony Section provides general information such as monthly fee, privileged fixed fee, free call-time and other information (reduced tariffs during certain days or hours or even calls to selected numbers, etc.). Moreover, visitors can obtain information about charges regarding various categories of calls and in particular local and national calls, calls to mobile phones (depending on the terminating network) and international calls (depending on the terminating country). In all cases, minimum call duration, charge rate, fixed call fee (if any) and charge per call-minute are presented. The latter may vary depending on call duration, as applied based on the time of call. The specific charges correspond to calls made during the peak hours (Peak hour is defined in an individual way by each provider).

Moreover, visitors may search for more information through hyperlinks to the web-pages of the fixed and mobile telephony providers and specifically to the web-pages of the specific packages.

This application is a useful tool aiming at providing an overall and brief picture of the market, and facilitating consumers in identifying those packages and providers meeting their needs. One of EETT priorities is to enrich the presentation method as well as to improve the web-pages' updating procedure.

Furthermore, acknowledging that price and service quality are predominant, EETT has initiated an important project. The specific project refers to the identification, calculation and publication of quality indicators for telecommunications networks and services.

<sup>&</sup>quot; It is noted that this Section does not provide information about roaming calls or data transfer and added value services or 3d Generation services (video-calls, etc.).

### 2.2.7. Mobile Telephony Antenna Mast Constructions

The Antenna Mast Constructions volume required all over the Greek territory is directly related to mainly two parameters. First, the (increasing) penetration of the mobile telephony and second the launch of new telecommunications applications based on wireless networks.

In accordance to a Joint Ministerial Decision (JMD)<sup>12</sup>, clear requirements have been set for taking all the necessary measures in order to protect the public. The specific measures are taken before releasing any Licence for Constructing an Antenna Mast. EETT is responsible for the granting of Antenna Mast Construction Licences. Each Licence granting requires the previous consent of the Hellenic Atomic Energy Commission (HAEC), which is in charge for protecting the public by the emitted radiation. For this reason, it performs on site inspections and measurements and also provides information to the public. It is noted that the larger the number of antennas of a provider in a certain area, the smaller the electromagnetic radiation emitted by each antenna.

During 2004 EETT received about 1,000 requests/complaints from citizens and other bodies regarding mobile telephony Antenna Mast Constructions. The complaint volume is significantly increased compared to 2003 due to the strong concerns of the public about the appropriate radiation level thresholds and the conformance of the MTOs to the specific thresholds. Following a detailed review of these complaints, it was found that the majority of cases (820) concerned licensed antenna sites.

Regarding illegal Antenna Mast Constructions EETT intervened through performing the necessary

inspections/ examinations, in order to identify their owners and impose the administrative sanctions according to the law. Following that, EETT informed the responsible Town Planning Authorities and the competent Public Prosecutor of the Court of Misdemeanors to ensure removal of any illegal site and impose the necessary<sup>13</sup> penal sanctions. The complaints and administrative sanctions related to mobile telephony antennas are detailed in subsection 5.2.1.

#### 2.3. Regulation of the Postal Market

The new Regulatory Framework which was implemented under Law 3185/ 2003 by the Regulations on General Authorizations and Individual Licences<sup>14</sup>, ensures quality for the provision of the US and Courier services to the benefit of consumers.

It is noted that the US is a set of basic postal services provided permanently, at affordable prices and set quality, to all residents of the country, without discrimination, regardless of their location in the Greek territory. In Greece, the assigned USP is ELTA.

Courier services relate to the special express conveyance of postal items and, as opposed to the US, constitute an individualized service, which requires a minimum level of organizational specifications in postal undertakings, aiming at ensuring the quality of provided services. The new Regulatory Framework provides for the dispatch of Courier items with a special Express Delivery Voucher (EDV) which states their necessary identification details as well as their tracing by a Special Postal Items-Track and Trace-System (SPITTS), that undertakings need to have.

Courier undertakings operate in the framework of the Charter of Obligations towards Consumers (COC), which

<sup>12</sup> JMD 53571/3839/2000, GG Issue 1105/B/06-09-2000.

<sup>13</sup> Law 2801/2000.

<sup>14</sup> GG Issue 1682/B/14-11-2003 and 1906/B/22-12-2003 respectively.

includes the procedures for the submission of complaints, the fields of responsibility for the undertaking and the amount of compensation in case of loss, delay in delivery or damage to the postal item. COC also provides for a mechanism for the resolution of disputes by setting up a Dispute Resolution Committee, with mandatory participation of a consumers' representative.

Following a relevant opinion of EETT, the following Regulations were issued in 2004, safeguarding consumers' rights:

- ➤ A Regulation<sup>15</sup> specifying a more flexible procedure for the holding of Hearings on postal services issues and investigations or other controlling actions, conducted by EETT.
- ➤ A Regulation<sup>16</sup> establishing a simplified procedure for the review of users complaints and the resolution of disputes arising between the State and postal undertakings, between postal undertakings and between the latter and consumers, performed by EETT.

#### 2.4. Control of Postal Undertakings

### Monitoring of the Postal Services Sector and Benefits to Consumers

In order to implement the abovementioned Regulations, EETT brought into force an effective control system to ensure that undertakings comply with the Regulatory Framework and operate in accordance with the principles of competition and with respect to consumers' rights. In this light, 19 regular controls in Courier undertakings were performed in 2004, in four large cities of Greece. 24 ad hoc controls were

performed as well in order to determine reported illegal operation subsequent to relevant complaints. The above controls contributed to the safeguarding of smooth market operation and the strengthening of consumers' trust to Greek postal undertakings.

As regards the complaints, EETT responded in special cases of complaints and enquiries from consumers, which can be classified as follows:

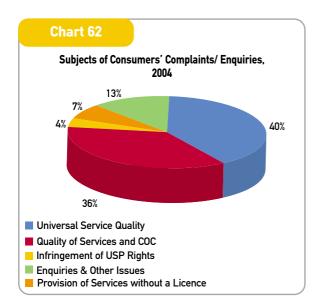
- Complaints against the USP regarding the quality of US services.
- Complaints against undertakings with a General Authorization about the quality of services and COC issues.
- Complaints against undertakings with a General Authorization about the infringement of USP rights.
- Complaints against undertakings for providing postal services without the required General Authorization or Individual Licence.
- Consumers' enquiries and other issues.

Following the review of complaints, EETT either mediates between the involved parties to reach a settlement or refers the issue to other competent authorities.

Unless a settlement is achieved, EETT summons the parties involved to a Hearing, where the case is reviewed and any violation of the postal legislation is ascertained. Subsequently, where appropriate, EETT may impose sanctions to the violator or take interim regulatory measures in order to avoid any further adverse impact to consumers or to the public interest in general.

<sup>15</sup> MD 36808/1026, GG Issue 970/B/29-06-2004.

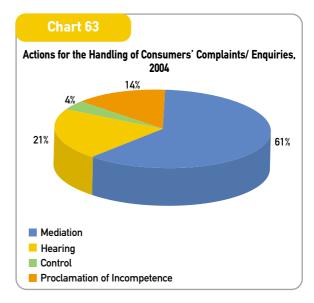
<sup>16</sup> MD 36809/ 1027, GG Issue 1083/B/16-07-2004.



In handling the above complaints from consumers, EETT took the following actions in 2004:

- Invited the defendant, to a Hearing.
- Performed a control of the defendant undertaking.
- Mediated in writing to the defendant or other competent authority for resolution or settlement of the problem.
- Referred the issue to other competent authorities.

It is noted that through the Section "Postal Services" on its website, EETT provides information to consumers about licensed postal undertakings registered with EETT Registry. In this way, consumers are aware that the undertaking meets the necessary requirements for the provision of quality services.



### 2.5. Monitoring of Universal Service Quality

EETT controls the quality of services provided by the USP by measuring the speed of dispatching 1st Priority Domestic Mail by the USP. Moreover, as regards the quality of international mail delivery, EETT uses the data issued by the International Post Corporation (IPC), based on measurements made in international mail.

Based on the data deriving from the aforementioned measurements, EETT intervenes to the extent required in order to ensure continuous improvement of the US to the benefit of consumers.



# **OLYMPIC GAMES: CONTRIBUTION TO SUCCESS**



### 3. Olympic Games: Contribution to Success

It was internationally admitted that the organization of the Olympic and Paralympic Games in 2004, in Greece, was absolutely successful.

The main factors which determined the successful carrying out of the Games in issues related to EETT were the following:

- Provision of telecommunications services to all users and the uninterrupted operation of telecommunication networks.
- Smooth operation of wireless communication networks, which were used to the maximum extent and successfully met communication needs for the Games.
- Meeting users' needs in postal services by all undertakings in the sector.

EETT's role to the achievement of the above was decisive, considering that it was the qualified body for the management and monitoring of radio frequencies at which wireless communication systems transmit. In this context, the full exploitation of the National Spectrum Management and Monitoring System (NSMMS), a technologically advanced infrastructure through which spectrum management and monitoring is performed, was a key factor. Also, EETT was in charge of monitoring the operation of the telecommunications and postal market throughout the Games.

# 3.1. Requirements to Meet the Needs of the Games

#### **Telecommunications - Radiocommunications**

The hosting of significant events such as the Olympic Games entails increased demands in telecommunications and radiocommunications, since these support the Games security requirements, the world television and media coverage and the communication needs of thousands of visitors.

During the Games, advanced security systems were used, whose operation was based on earth and overhead wireless image and sound transmission stations. Therefore, the uninterrupted operation of the relevant communication channels was a decisive factor for the secure organization.

As regards the promotion of the Games, a major part of media coverage and television broadcasting all over the world was based on wireless systems, such as wireless cameras, wireless microphones and communications systems of the parties involved in the broadcast. In such an important sports event, attracting the interest of all media, the transmission of television and radio signal should be uninterrupted.

Another significant parameter was the mass attendance of visitors, which created high demand in telecommunications networks of the country -especially mobile communications networks- and the interconnection of domestic networks to those abroad. These particular conditions required the upgrade and in some cases, the redesign of the telecommunications networks. Also, in the case of mobile communications networks, it was required to install new and/ or additional antennas at the venues of the Games.

The extensive use of many wireless devices in geographically restricted areas (e.g. Olympic venues) created great needs in radio frequency spectrum and increased risks of interference. Therefore, careful design and organization were required to ensure availability and clarity of the required radio frequency spectrum.

The above requirements were further increased due to the particularities and innovations demonstrated in the 2004 Games compared to previous ones or similar events. It is indicatively mentioned that for the first time the Internet was so widely used for the coverage of media needs. Moreover, the penetration of mobile telephony was significantly higher compared to previous Games and for the first time 3<sup>rd</sup> Generation mobile telephony services were so extensively released.

EETT timely scheduled and implemented the necessary actions and proceeded to the coordination of all organizations involved, which resulted in the uninterrupted operation of wireless systems and telecommunications networks.

#### Operation of the Postal Market

In the context of EETT's competences, a main goal during the Games was the coverage of additional needs in postal services due to the increased volume in mail for that period, as well as ensuring uninterrupted operation of the postal market.

To this end, EETT's intervention was deemed appropriate for the full service of users, both in the area surrounding the Olympic venues and in other areas of Athens and the Olympic Cities, mainly within the Controlled Entrance and Traffic Zones (CETZ) and Controlled Parking Zones (CPZ). In this context, in collaboration with the Athens Organizing Committee (ATHOC) 2004, access permits were issued within the CETZ and CPZ for the vehicles of licensed postal undertakings. Also, aiming at facilitating the public and especially foreign visitors, EETT published on its web site the postal undertakings which provided their services in Athens and the Olympic Cities.

# 3.2. Actions for the Smooth Operation of Radiocommunications

#### 3.2.1. Operational Plan

Already from 2002, EETT had prepared an "Operational Plan for the Provision of a Secure and Reliable

Radiocommunications Environment" during the 2004 Olympic Games, in which all its actions were based on, for the smooth operation of wireless communications of the Games. Also, since 2003 it had prepared the necessary procedures in collaboration with the remaining competent bodies (ATHOC 2004, Ministry of Transportation and Communications - MTC, etc.).

The main priorities of EETT's actions, based on its Operational Plan, were the following:

- > Early planning of spectrum use.
- Granting of temporary spectrum use licences to Olympic users.
- ➤ Ensuring radio equipment operation according to the terms of spectrum use licences.
- Continuous monitoring of the radio frequency spectrum, particularly at the Olympic venues and the wider area of Attica, thus ensuring immediate and effective dealing with any interference.

#### 3.2.2. Spectrum Use Planning

Already since 2003, EETT had proceeded to the detailed recording of requirements for radio frequency use, taking into account spectrum availability. In the cases where limited availability was ascertained, EETT saw to the provision of additional frequency bands. Moreover, it placed particular emphasis on the coordination of available frequencies in order to avoid interference, ensure optimum spectrum exploitation and enable processing of new users' requests, even during the Games.

#### Frequency Plan

A benchmark of the spectrum use planning was the preparation of Frequency Plans which had begun before the end of 2003. Those Plans included the allocation of all services managed by EETT per frequency band, according to their technical characteristics (Table 16).

Table 16						
Services managed by EETT						
Wireless Cameras	Fixed Point Links					
Fixed Point	Mobile Wireless					
Satellite Links	Service					
Land Mobile	Mobile Microcell					
Service	Links					
Portable Satellite	Telemetry and					
Station Service	Telecommand					
Talk-back Service						

For the implementation of those Plans, the data of the respective services/ applications were examined in detail, as well as the existing availability of the radio frequency spectrum. More specifically:

- A priority list of all services was compiled, based on their critical character.
- The priority of each category of users was identified.
- > All locations of venues were recorded per complex.
- ➤ The required geographical area of coverage was identified per venue/ sport.
- ➤ The equipment operating frequency bands were recorded per service.
- Spectrum availability was examined per geographic area, based on the National Frequency Allocation Table (NFAT) and on the National Radio Frequency Registry (NRFR) kept by EETT.
- Spectrum occupation measurements were performed at various bands and venues.

#### **Temporary Availability of Additional Spectrum**

The design of Frequency Plans, combined with users' requests, the operating band of the equipment and the measurements performed revealed that the available frequency bands did not suffice to satisfy the increased requests in specific frequency bands and geographic areas.

For this reason, EETT made agreements for the temporary granting of spectrum by main users and in particular the Armed Forces, OTE and radio amateurs. In parallel, EETT consulted the radio and

television stations to move their broadcasting radio links to specific frequency bands and geographic areas. The aim was to coordinate with the Games communication systems and minimize potential interference caused to them.

#### **Coordination Study**

In order to achieve effective coordination between users, EETT carried out a technical coordination study for each frequency band, based on the following principles:

- Satisfaction of all requests for radio frequencies and ensuring equipment's operation within the range of its operating frequency band.
- Ensuring satisfactory coverage within the requested geographic area.
- Avoidance of interference in existing systems (permanent/ temporary basis) by setting up the proper technical characteristics (channel, power, polarization) of the requested equipment.
- Ability to re-use the same frequency at another remote geographic area by setting up the suitable equipment power, in order to achieve spectrum saving.
- Suitable selection of VHF-UHF frequencies for the avoidance of intermodulation phenomena.
- Sufficient spatial-frequency isolation of VHF-UHF transmitters and receivers for protection from spurious emissions.

#### 3.2.3. Licensing

The licensing of Olympic users (national delegations, technicians for the coverage of the Games, the Media) in 2004 was the crowning of all preparation actions of previous years. The effective spectrum use planning ensured optimum allocation of services per frequency band and geographic area, based on the technical characteristics of the used equipment. At the same time, urgent requests have been served, even during the Games. The expected high number of requests created the need to apply a more flexible and fast licensing procedure.

In this light, a special Internet application, "espectrum", was designed, which aimed at the fully electronic submission, monitoring and processing of frequency assignment applications. Members of EETT in collaboration with members of ATHOC 2004 prepared the technical specifications and supervised the implementation of the application, which was published on the site of ATHOC 2004.

The management of "e-spectrum" application requests started in early 2004.

The frequency pre-assignment procedure for satellite services began on 7th January 2004 and in early March 2004 for all the remaining services. The proposed frequencies for use were registered in the espectrum application coupled with the relevant cost, and the interested users were notified. In the cases where satisfaction of the initial requests of users was not possible, the optimum alternative solutions were proposed.

In some cases it was required to make last minute adjustments in order to meet high priority user needs, who revised their requests, due to lease of equipment with a different operating frequency, just before the commencement of the Games.

7,860 applications were processed in total, submitted by 108 international users, among which 77 international Media and international news agencies. Total fees for spectrum use collected by Olympic users stood at about 735,000 euros.

#### **Additional Requirements**

In parallel to the above actions which ensured radio frequency spectrum to Olympic users, EETT successfully responded to the increased needs of institutions involved in the Olympic Games, such as security forces and Mobile Telephony Operators (MTOs).

Specifically, EETT assigned the following operational frequencies to support the significant task of security forces:

- 36 frequencies to security and escort groups for VIPs (Presidents, Prime Ministers, etc.) as well as to delegations of diplomats.
- > 20 frequencies to the Ministry of Public Order.
- > 72 frequencies to the Hellenic Army General Staff (HAGS) for use by the North Atlantic Treaty Organization (NATO).

As regards MTOs, due to the increased traffic during the Games, they designed the expansion of their networks aiming at the best service of all visitors. In this light, a while before the Games, EETT gave priority to applications for Antenna Mast Constructions, in Attica and specifically in Olympic venues. More specifically, 94 mobile telephony antennas were licensed at Olympic venues. Furthermore, following this procedure, the companies COSMOTE, TIM HELLAS and VODAFONE were granted a licence to use an additional spectrum of 2x5MHz in the area of 1800 MHz during the Games, for 344,000 euros.

The requirements of other organizations, who offered services for the needs of the Games and to whom spectrum on a temporary basis was granted, were also increased. A characteristic example was the assignment of 67 frequencies for temporary operation of Private Mobile Radio (PMR) networks to Radio-Taxi Associations in Attica, in order to deal with the increased traffic of visitors in the basin.

#### 3.2.4. Radio Equipment Control

In the implementation of its Operational Plan, EETT prepared, in collaboration with ATHOC 2004, procedures for the effective radio equipment control. The aim was to use at the Olympic venues, equipment conformed to the conditions mentioned in the relevant radio frequency assignment licence.

Subsequently, EETT provided to users and visitors information regarding radio equipment control and marking procedures, as well as the requirements and types of radio equipment which could be used in Greece during the Games. Information was provided through a special form which was published on the EETT and ATHOC 2004 websites.

According to the aforementioned procedures, sampling controls were scheduled and performed per user and per application for the radio equipment intended to be used in the Olympic Games. The controls were made on various equipment categories, such as portable transceivers with or without base stations, telemetry and telecommand equipment, wireless microphones, talk-back systems and in-ear monitors. Controls were focused on technical characteristics of the devices, such as power and frequency of emission, frequency deviation, and spurious emissions, according to the frequency assignment licence, granted by EETT. A special label (EETT self-adhesive label) was placed on those devices that were in compliance with the relevant licence terms.



Image 1: Self-Adhesive Radio Equipment Label

For the optimum planning of measurements and in order to facilitate radio equipment users, EETT, in collaboration with the Telecommunications Division of ATHOC 2004, operated 3 radio equipment control centers; at the International Broadcasting Centre (IBC), at the Main Press Centre (MPC) and at the Olympic Village. The controls were performed on a

daily basis for the period from 19th July 2004 until the end of the Games on 28th September 2004, by the EETT scientific and technical staff.

568 devices belonging to 83 different users were subject to sampling control, such as radio-television stations, press agencies and athletes delegations. On the basis of results from the representative controls, use was allowed to 15,359 devices which were labeled, while problems were encountered in 32 devices not complying with the frequency assignment licence conditions.

### 3.2.5. Radio Frequency Spectrum Monitoring – Effective Resolution of Interferences

#### **Spectrum Clarity Control**

The control of clarity for the bands included in the prepared Frequency Plans, as well as the ascertainment of legal use of the permanently assigned frequencies according to the NRFR were particularly crucial actions for the smooth operation of communications systems of the Games. For this reason, already from 2003, EETT had begun the implementation of a program for spectrum clarity control and elimination of illegal broadcasts.

Upon completion of pre-assignment of frequencies, a proactive control of all Olympic frequencies and clearing from harmful interference was made for all services using bands, managed by EETT (Table 16, p. 69).

After the second quarter of 2004 when a large part of frequency assignment to Olympic users had been complete, the control program was enhanced. Special attention was paid to frequency areas with the highest demand per venue, e.g. Athens Olympic Sports Complex (OAKA).

In parallel, particular importance was placed to the protection and control of frequencies of the Civil

Aviation Authority (CAA), given the high traffic expected at the Athens International Airport (AIA) "Eleftherios Venizelos". Specifically, controls were performed in areas where stations for communication with aircrafts were installed and measures were proposed to enhance protection of the aforementioned stations from harmful interference.

#### **Efficient Resolution of Interferences**

During the Olympic Games, an Olympic Monitoring Centre (OMC) was operating on a 24-hour basis at the EETT headquarters for the coordination of the spectrum protection project, the resolution of any interference problems and the provision of support services to Olympic users. In parallel, technical units were constantly present and monitored all sports venues in Athens and the remaining Olympic cities.

The main operations supported by the OMC were:

- Recording of problems due to interferences in direct communication with the ATHOC 2004 Technology Operating Centre (TOC), the Olympic Security Centre (OSC) of the Olympic Games Security Division (OGSD), the CAA operations centre, as well as technical units of EETT that covered all the Olympic facilities, on a 24-hour basis.
- 2. Activation of Fixed Monitoring Stations (FMS) of the NSMMS for the precautionary spectrum control and the investigation of interferences.
- 3. Planning and coordination of actions of technical units at Olympic facilities to resolve interferences.
- 4. Support of Olympic spectrum users with the provision of information and instructions.

During the Games, 210 units operations were performed in total in all sports and non-sports venues. Interference events for which relevant trouble tickets were issued through the TOC were minimum (about 20), all having low critical character and were immediately resolved.

### National Spectrum Management and Monitoring System

The effective exploitation of technical infrastructures of the NSMMS greatly contributed to the successful protection of all legal spectrum users during the Games and the fast resolution of all interferences incidents which occurred.

This is a technologically advanced and highspecifications infrastructure, on which spectrum management and monitoring in Greece is based. In its implementation during the Olympic Games, the NSMMS included:

- 4 FMS (2 in Attica and 2 in Thessaloniki).
- 7 Mobile Monitoring Stations. These are vehicles carrying special equipment for spectrum measurements, such as receivers, spectrum analysers, antenna set and radio direction finders (Images 2 and 3).
- ➤ 7 Mobile Monitoring Stations and 16 portable monitoring sets, which include similar but smaller equipment than that of Mobile Monitoring Stations, which enables their use when access is not possible through the Mobile Monitoring Stations.



Image 2: Mobile Monitoring Stations



**Image 3: Mobile Monitoring Stations** 

For the full exploitation of each NSMMS subsystem, EETT performed a number of intensive measurements in order to imprint current spectrum use, timely deal with illegal broadcasting and ensure coverage of increased requirements of spectrum Olympic users. The FMS recorded the spectrum on a 24-hour basis, under the surveillance of the EETT staff and in parallel, special units with the Mobile Monitoring Stations and the portable monitoring stations monitored and performed measurements at all Olympic facilities and adjacent areas on a daily basis.

### 3.3. Planning for Telecommunications Emergencies

The increased demands of the Games, the particularity and the critical nature of telecommunications for successful hosting, brought telecommunications providers before extremely significant challenges, especially as regards uninterrupted provision of high-quality telecommunications services, both for the needs of organization of the Games and visitors' needs, in parallel with the provision of equally high level of services to the remaining consumers.

EETT, in order to meet the above challenges, prepared an Emergency Operational Plan, for the

coordination of the necessary actions. The Plan provided for the set up of Working Groups with representatives of all providers involved and EETT, the primary goal being communication and provision of mutual information in case of the Plan, problems. According to representatives of those Groups should be standby on a 24-hour basis throughout the Games, in order to immediately and efficiently deal with any problems. Moreover, the Plan provided for cases of problems with the involvement of more than one providers or other institutions and the method of resolution, and it also specified the role of EETT for the coordination of all sides.

In parallel, EETT proceeded to a number of contacts with all telecommunications providers involved, aiming at ascertaining preparation and timely dealing with any problems at that stage. The most important problems faced were related to malfunctions in collaboration of providers -such as delays in orders of telecommunications infrastructures-, as well as delays due to bureaucratic procedures during the installation of telecommunications infrastructures.

The suitable preparation of providers, but also the implementation of the Emergency Operational Plan resulted in the uninterrupted operation of telecommunications networks during the Games.

# 3.4. Regulating the Operation of Postal Services

In order for the market of postal services to respond to the increased mail traffic during the Games, EETT took the following actions:

In collaboration with ATHOC 2004, EETT saw that postal undertakings operating in Olympic cities were granted access permits to CPZ and CETZ. These permits enabled access for the provision of postal services to users inside and outside CPZ and CETZ by all licensed undertakings. ➤ EETT was briefed by postal undertakings about the measures they were willing to take for dealing with additional requirements arising during the Games and monitored the implementation thereof. Subsequently, for the better service of users-visitors, EETT published on its website the relevant information as well as a list with full details of the undertakings operating in Olympic Cities and Municipalities.

The actions taken by the undertakings for guaranteeing smooth operation of the postal market during the Games can be summarized as follows:

- Organization of special sorting, forward and distribution procedures for mail items, in order to respond to increased demand and to requirements for safety both for the venues and mail.
- Special care for the secure and timely transfer of items that were significant for the Games, such as doping test samples, films, etc.
- Establishment of special transaction hours at critical points, as well as at courier branches adjacent to Olympic facilities.
- Enhancement of human resources by recruiting seasonal staff.
- ➤ Enhancement of users' communication lines and extension of operating hours for the Customer Service Departments.

# 3.5. Coordination with other Organizations

For the successful performance of the Games, EETT was in continuous collaboration with the following organizations:

ATHOC 2004: Collaboration on a daily basis with the ATHOC 2004 Technology Division for the identification of procedures to be followed, separation of duties and review of ATHOC 2004 and accredited users requests. The effective collaboration with members

- of ATHOC 2004 limited response time to minimum. It should be noted that ATHOC 2004 had increased needs in radio frequencies, mainly at the opening and closing ceremonies, but also for the support of works throughout the Games. For the coverage of specific needs, EETT, in collaboration with OTE, CAA, associations of radio amateurs and the Armed Forces, assigned frequency bands temporarily to ATHOC 2004, which had been allocated to the above users.
- International Olympic Committee (IOC): EETT participated in the ordinary monthly meetings with IOC, in the framework of Technology Monthly Project Review meetings organized by ATHOC 2004. At the meetings, EETT presented the progress of its works and the implementation of the Radiocommunications Operational Plan.
- OGSD: EETT held a number of meetings with OGSD representatives and other security forces in terms of satisfying their requests for the provision of radio frequencies for the needs of the Games, and also on issues of collaboration at operational level. The frequencies assigned for use by various systems of the C4I (Command, Control, Communications, Computers and Intelligence) security support project, contributed to the safe performance of the Games. Many of the project systems remained in use also after the end of the Games.
- Olympic Games Radio Spectrum Working Group: EETT continued in 2004 its active participation in this Group, where ATHOC 2004, the MTC, OGSD, the Ministry of Press and Mass Media, Athens Olympic Broadcasting (AOB), the National Radio-Television Council (NRTC) and main spectrum users in Greece, such as the Armed Forces, CAA, ERT and OTE also participated representatives. The main goal of the Group was to resolve radio spectrum availability problems to meet the needs of the Games and also to settle organization and coordination issues.

- Institutions with increased needs in radio frequencies: Meetings were held with the institutions which were the greatest users of radio spectrum during the Games, such as AOB, the National Broadcasting Corporation (NBC), European Broadcasters Union (EBU), Japan Consortium (JC) etc. During the meetings, EETT provided information about the licensing regime and the technical characteristics to be met in their applications. In parallel, consultation was made in relation to the needs of institutions in radio
- frequencies and optimum methods to meet them. Frequency assignments to those institutions had been completed before the opening of the Games and there were few further needs in frequencies which arose during the Games.
- ➤ Telecommunications Providers: Meetings were held with all involved telecommunications providers. The aim was to supervise the preparation of providers, prepare the Emergency Operational Plan and the timely dealing with any problems at the last stage of preparation.

### **TELECOMMUNICATIONS SECTOR**



### 4. Telecommunications Sector

In this Chapter the main actions of EETT in the telecommunications sector for the year 2004 are presented. These actions are focused into the following six main areas:

- Promotion and safeguarding of fair competition: EETT has proceeded to actions related to Interconnection, Carrier Pre-Selection (CPS) and Number Portability (NP). EETT has also ensured the implementation of the regulatory framework for the Leased Lines by OTE and the implementation of cost accounting systems by providers being under the relevant obligation.
- Promotion of regulatory interventions based on the New Framework: EETT has focused its actions on the definition of individual markets related to electronic communications as well as on the analysis of the level of competition in each of these markets.
- Development of Broadband in Greece: EETT's actions focused on the introduction of Unbundled Access to the Local Loop (LLU) and ADSL access, as well as on the development of the Wi-Fi market.
- Internet promotion: The scheme Registrar -Registrant - Registry was put into operation for the assignment of Domain Names holding the [.gr] suffix. In addition, the regulatory framework for the implementation of Voluntary Accreditation (VA) of Certification Service Providers (CSP) was completed.
- Security and quality enhancement of telecommunications networks and services: Further to the actions that EETT has undertaken to ensure the implementation of Universal Service (US), two additional projects commenced in 2004. The first one aims to prepare action plans for handling emergency situations while the other has to do with the provision of information related to the quality of networks and services.
- Monitoring of the telecommunication market: During 2004. EETT continued the collection and processing of data relevant to the progress of the

telecommunication market in Greece and the development of the relevant organizational and technical infrastructure.

# 4.1. Promotion and Safeguarding of Fair Competition in Networks and Services

#### 4.1.1. Interconnection

Ensuring Interconnection of telecommunications networks is one of the fundamental requirements for the development and the smooth operation of the telecommunications sector, since it enables communication between users of different networks, and the access of services provided by one network to users of another.

During 2004, great effort was devoted by EETT into the following three areas:

- a) Interconnection of alternative providers with OTE, regarding calls to non-geographic numbers. These are numbers that provide calls either free of charge or by sharing the cost of the call (numbers having 800, 801 prefix respectively) as well as calls that are charged at premium rates (numbers having 90 prefix).
- b) High Interconnection fees for call termination to mobile telephone networks.
- The use of GSM-gateways for call termination to mobile telephone networks without using Interconnection.

In addition, given the obligation of OTE for a costoriented tariffing in most of the Interconnection services, EETT proceeded to the relevant cost accounting audit which is presented in detail in subsection 4.1.5.

The progress of Interconnection traffic volume in fixed and mobile telephony is presented in subsection 1.1.4.

#### Interconnection of Alternative Providers with OTE

During 2004, EETT's main interventions in the telecommunication market, related to Interconnection, were of supervisory and controlling nature. These interventions were focused on the clarification of procedures as well as on the resolution of problems related to Interconnection as regards the ability of alternative providers to offer free, shared and premium rate services.

The aforementioned services are an important part of the Interconnection market and have attracted the interest of all alternative providers. The development of competition in this part of the market and the offer of new and innovative services by alternative providers is expected to bring significant benefits to consumers and the users of these services.

Since 2001, special provisions for the regulation of the aforementioned services had been incorporated in the Reference Interconnection Offer (RIO) provided by OTE. These provisions aimed at OTE's obligation to deliver, at Interconnection points specified in RIO, calls originated from its network and terminated to non-geographic numbers of alternative providers. It is noted that OTE's RIO forms the basis of the negotiations for the signing of Interconnection agreements between OTE and alternative providers of fixed telephony services.

EETT, responding to complaints of alternative providers for delays by OTE in the provision of the above services, held a number of Hearings in order to ensure the access of OTE subscribers to the services provided by the alternative providers on one hand and the access by the subscribers of alternative providers to OTE's services on the other.

Another area that required EETT's intervention was the disagreement between OTE and alternative providers on the tune of the Letter of Guarantee that OTE demanded from the alternative providers in order to provide

Interconnection services. This Letter of Guarantee offers protection of OTE's interest in case of unsafe claims. It is worth mentioning that a similar problem has also taken place between an alternative provider and TIM HELLAS.

In order to resolve the above issues, EETT, following complaints by the alternative providers, summoned the parties concerned to Hearings. In the case of Letters of Guarantee, EETT issued a Provisional Order encouraging the parties involved to reach an agreement on the tune and then to communicate this agreement to EETT in writing coupled with their memorandum on the Interim Measures Procedure. Furthermore, EETT invited OTE to refrain from any interruption of Interconnection services offered to the alternative providers until the issue of the Interim Measures Decision. Following that Decision, OTE came with a new proposal in relation to the tune of the Letter of Guarantee, which was considered by EETT to be fair and after that the request for Interim Measures was rejected.

OTE Hearings in relation to the Interconnection of Free. Shared and Premium Rate Services Calls

EETT held a Hearing following complaints of ALGONET, FORTHNET and TELLAS for violation by OTE of the telecommunications legislation and the rules of free competition. Their complaints were related to the satisfaction of their requests for Access and Interconnection with OTE's network, for the provision of free, shared and premium rate services. The main allegation complainant of alternative providers was that OTE's behavior essentially constituted a refusal to provide access and Interconnection to their network and restrained them from providing the aforementioned services.

Based on the information that was made available to EETT, the followings were ascertained:

> The behaviour of OTE constituted a breach of the

- obligation to negotiate Interconnection and a tacital refusal to provide Access.
- This behaviour was opposed to the principle of impartiality in the provision of Access/ Interconnection and the obligation for costoriented tariffing of the relevant services.
- ➤ The refusal to provide Access prevented the development of competition in those markets.

On the basis of the above and taking into account the significance of the issue, the duration of the violations, the extent of impact on the smooth operation of competition in the relevant markets and the effect on consumers, as well as the extent of business activity and the financial power of OTE, EETT imposed by means of its Decision¹ a total fine of € 60,000 on OTE, and the following obligations:

- ➤ To immediately satisfy every reasonable request coming from a telecommunications provider for Interconnection and Access to its network by the use of non-geographic numbers.
- To immediately modify the Interconnection contracts in the case that terms opposing the provisions of the specific Decision were included.
- ➤ To immediately submit to EETT evidence which prove the cost-orientation of the retention fee.

In addition, by means of the same Decision, EETT warned OTE with the imposition of  $\[ \in \]$ 1,000 fine for each day of delay to comply with the aforementioned obligations.

EETT summoned again OTE to a Hearing<sup>2</sup> to investigate the extent of compliance with the obligations imposed with its aforementioned Decision. The new Decision is expected to be issued in early 2005.

The result of those actions of EETT was the

activation of Interconnection services by OTE in relation to free and shared cost calls as well as the signing of agreements between OTE and alternative providers. These agreements also include the provision of premium rate services. The above mentioned modifications constitute a decisive step to the deregulation of the Interconnection services, considering that now more alternative providers are expected to ask for modification of their own Interconnection agreements, in order to provide similar type of services.

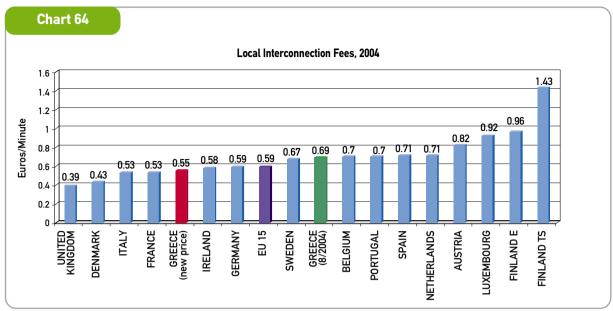
#### Fees for Interconnection to the OTE Network

Interconnection fees are a significant factor for the development of the market. According to the 10<sup>th</sup> Report of the European Commission, Interconnection fees in Greece (August 2004) were higher than the European Union (EU) average, with differences depending on the type of Interconnection -Local, Simple, Double- as they are illustrated in Charts 64, 65 and 66.

The cost accounting audit of OTE was completed in October 2004 (see subsection 4.1.5.) and led to a significant reduction of Interconnection fees. The new tariffs - Local Interconnection 0.55/ minute, Simple Interconnection 0.78/ minute and Double Interconnection 1.24/ minute place Greece among the cheapest, in terms of Interconnection fees, countries of the EU (see Charts 64, 65 and 66). It should be noted that any comparison of the new tariffs in Greece with those of the other EU member states should take into account the possibility that these tariffs might have been adjusted in the meantime. It is also noted that, as opposed to the previous tariffs, the new ones do not include the cost of signalling and cost of the 2Mbps ports.

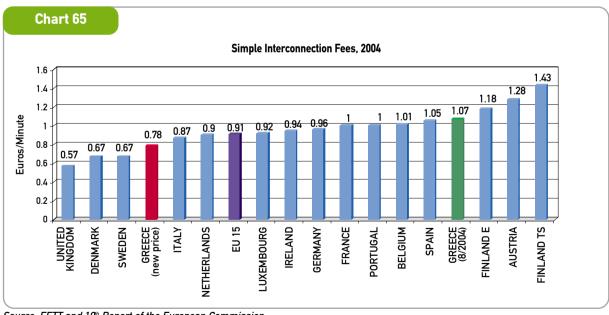
<sup>&</sup>lt;sup>1</sup> EETT Decision 308/45/03-03-2004.

<sup>&</sup>lt;sup>2</sup> Ref.No. EETT 26704/F.391/06-10-2004.

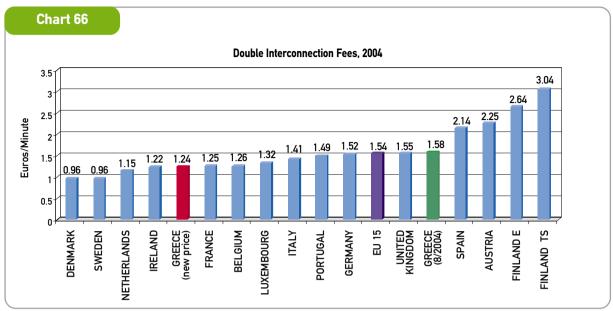


Source: EETT and 10th Report of the European Commission

Note: The data for Denmark, the United Kingdom and Sweden have been recalculated using the exchange rate of 2004. In Finland 46 providers with Significant Market Power (SMP) are currently operating, whose fees are different. The above Interconnection fees are based on the fees of the two largest SMP providers, namely Telia Sonera (FIN TS) and Elisa (FIN E). Data for Luxembourg include call restoration cost, as opposed to that for Italy. Data for Austria are based on an action plan.



Source: EETT and 10th Report of the European Commission



Source: EETT and 10th Report of the European Commission

#### **Call Termination to Mobile Telephony Networks**

Under the framework of the national telecommunications legislation in force, EETT has intervened a number of times the last three years, in order to regulate the call termination fees to mobile telephony networks. These fees were and still are higher in Greece as compared to similar call termination fees in other EU member states.

In order to promote efficient competition, EETT has designated since 2003 the telecommunications providers COSMOTE, OTE and VODAFONE as SMP Organizations in the Interconnection of public telecommunications networks, and the providers COSMOTE, TIM HELLAS and VODAFONE as SMP Organizations in the public network and public mobile telephony services markets. This was done by means of a number of Decisions<sup>3</sup>. As a result of these Decisions, COSMOTE and VODAFONE should, among others, offer cost-oriented termination fees to their networks, while TIM HELLAS should, among others, offer termination fees at reasonable prices.

However, these providers failed to submit the necessary information to EETT showing that their fees were in line with the above obligations. On the contrary, they submitted an Abrogation Suit of the aforementioned Decisions before the Council of State (CoS). COSMOTE also submitted an Application for Execution Respite of the relevant Decision of EETT, which was then rejected by the CoS. The Decisions of the CoS as regards the aforementioned Suits for Repeal are still pending.

In 2004 EETT, aiming to reduce the termination fees to mobile networks, directed its actions to two main axes. Firstly EETT exercised the potentiality provided under the existing national legislative framework and the relevant EETT Decisions in order to achieve immediate reductions of termination fees by the Mobile Telephony Operators (MTOs). Then it took all the necessary actions for the immediate implementation of the provisions of the new European legislative framework on the evaluation of the level of efficient competition in the market of call termination to mobile networks. In particular, EETT

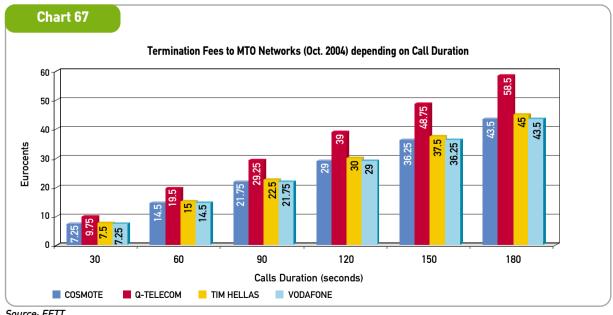
<sup>&</sup>lt;sup>3</sup> EETT Decision 275/72B/07-02-2003 and 278/65/14-03-2003.

defined the market, analysed the level of competition, defined SMP providers and specified the suitable regulatory obligations. Then, EETT communicated the above information to the European Commission, in accordance with the procedures provided for in the New Regulatory Framework (NRF) (see subsection 4.2.1.).

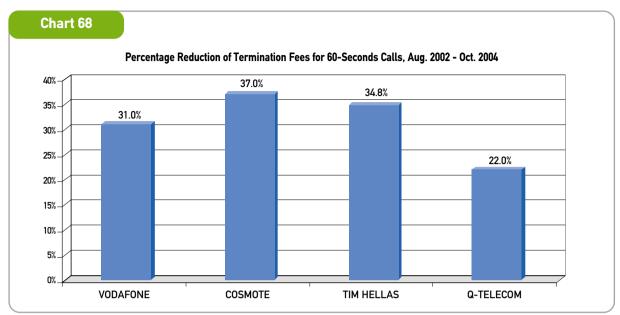
As a result of the above, the four MTOs proceeded from October 1st, 2004, to further reductions of termination fees from fixed networks to their networks (see Table 17 and Chart 67). These reductions immediately affected consumers since it led to a respective reduction of retail prices for calls to mobile phones (see subsection 2.2.1.).

It is worth mentioning that the termination fee for a call of 60 seconds from a fixed to a mobile phone was gradually reduced in the period from August 2002 -October 2004 by 37% in the case of COSMOTE, by 22% in the case of Q-TELECOM, by 34.8% in the case of TIM HELLAS and by 31% in the case of VODAFONE (see Chart 68).

Table 17								
Reduction of Termination Fees to MTO Networks, 01-10-2004								
	Before 0	1-10-04	After 01-10-04					
	Price in	Minimum	Price in	Minimum				
	Eurocents/Minute	Charge Time	Eurocents/Minute	Charge Time				
COSMOTE	17	30′′	14,5	30′′				
Q-TELECOM	23	30′′	19,5	30′′				
TIM HELLAS	17	30 ′ ′	15	30 ′ ′				
VODAFONE	17	30 ′ ′	14,5	30 ′ ′				

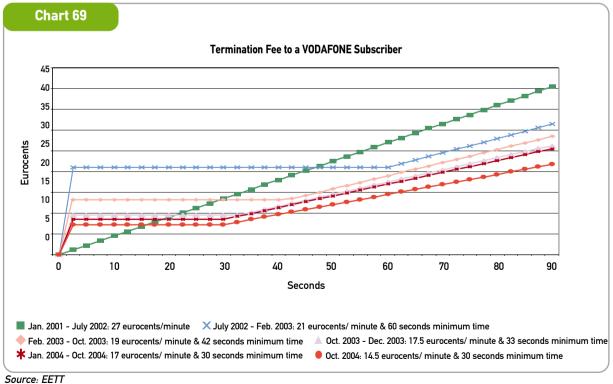


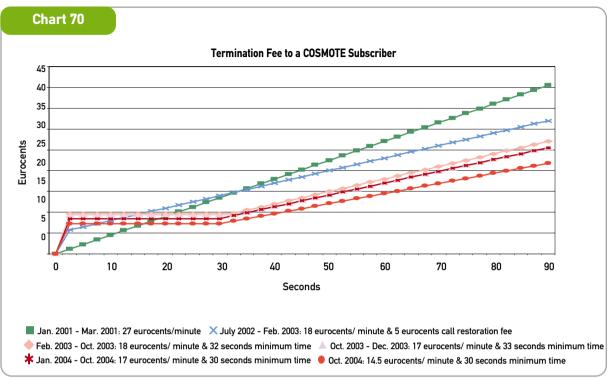
Source: EETT



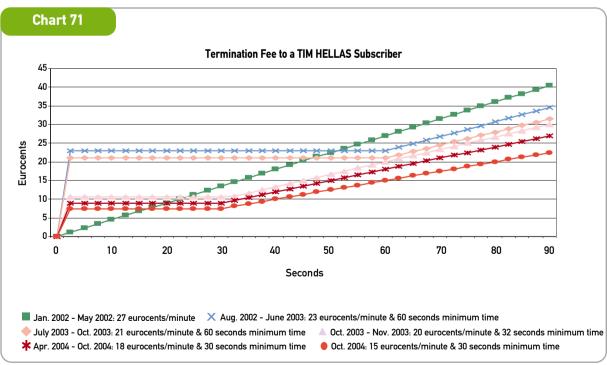
Source: EETT

The evolution of termination fees to the network of each MTO from 2001 until the end of 2004 is detailed in Charts 69. 70. 71 and 72.

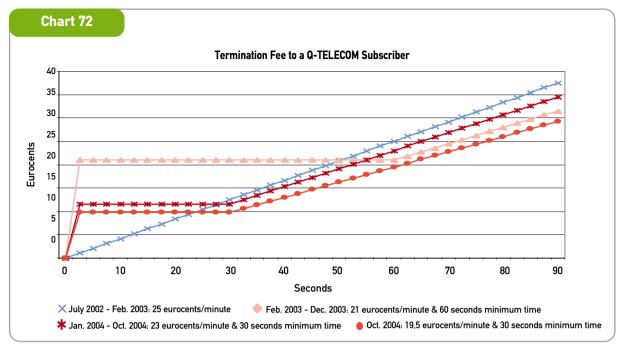




Source: EETT



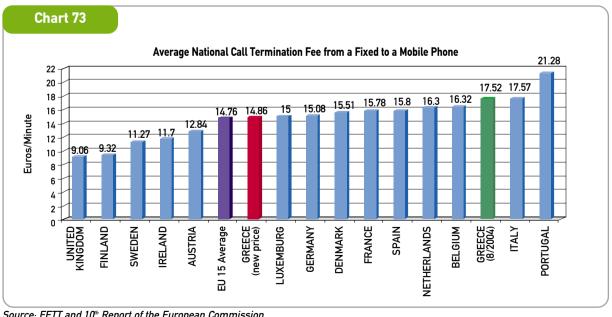
Source: EETT



Source: EETT

Chart 73 presents the average national termination fee to mobile telephony network for the 15 EU member states, based on the  $10^{\text{th}}$  Report of the European Commission (August 2004 data). According to the data, Greece is the third most expensive country after Italy and Portugal, with an average national termination fee at 17.52 eurocents. Here it should be noted that the

reduction in termination fees as of 1st October 2004 improved the situation. It is clarified, though, that the comparison of new termination fees with the fees applicable in other EU member states in August 2004 is not possible, since many of these have been subject to respective reductions.



Source: EETT and 10th Report of the European Commission

## Use of GSM-gateways for Call Termination to Mobile Telephony Networks

GSM-gateways are telecommunications terminal devices connected to the telephone centres of large business customers of MTOs in order to transform calls from fixed to mobile phones into calls from mobile to mobile. This is done because the fees for the latter type of calls are lower. This transformation is achieved with the use of SIM cards inserted in GSM-gateways.

The use of GSM-gateways is particularly widespread by alternative providers. They connect the GSM-gateways to their switching centers and use them so that calls from their networks to the networks of other MTOs are mainly routed through the GSM-gateways. An indicative example of the use of GSM-gateways is given below (see Figure 1):

Consider a subscriber of OTE who has selected an alternative provider through Carrier Selection or Preselection to process calls to MTOs subscribers. Lets assume that this subscriber wishes to call an MTO subscriber. The call is routed from the OTE network to the network of the alternative provider to be forwarded to the MTO network. There are two options at this point:

 In the first option the call is routed through Interconnection, either directly to the MTO network (call termination), where the alternative provider pays the termination fee to the MTO or through a third provider (call transfer), where the transfer fee is paid to the third provider, as it is determined by the applicable Interconnection agreement. 2. In the second option the call is routed through a GSM-gateway, as shown in Figure 1. In this case, the switching centre of the alternative provider recognizes that the called number is an MTO number and routes the call to one of the GSM-gateways. The GSM-gateway then selects the suitable SIM through which a new call will be originated to the called MTOs subscriber. By using this method a call from a fixed phone to a mobile phone is transformed into a call from a mobile phone to a mobile phone. The alternative provider pays the call fee to the MTO, as provided for under the specific business package.

Alternative providers use the GSM-gateways due to financial reasons, since the charges included in MTOs business packages for calls to mobiles are significantly lower even compared to Interconnection prices for call termination to MTOs networks. Therefore, and according to a relevant EETT analysis, wholesale prices (Interconnection prices) of some MTOs were disadvantageous for alternative providers compared to retail prices (business packages) provided. Given that MTOs business packages can address existing or potential customers of alternative providers, the large difference between wholesale and retail prices makes the use of GSM-gateways attractive to alternative providers in order to remain competitive.

It is noted that the quality of telephone services offered through GSM-gateways is lower compared to the quality of the respective services provided through Interconnection. More specifically, using GSM-gateways:

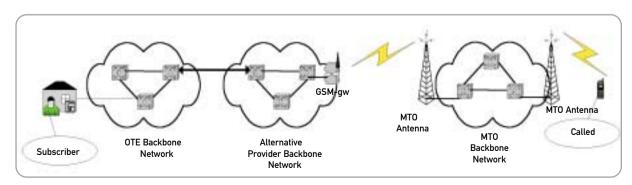


Figure 1: Call Termination to MTOs Network using GSM-gateway

- No Caller Line Identification (CLI) is transferred; therefore the calling number does not appear on the called mobile phone.
- The caller is usually subject to a large number of rejected calls for the completion of a call conversation.
- The restoration time of a call from fixed to mobile using a GSM-gateway is longer.
- Voice quality to users is usually lower.
- When the traffic served exceeds a certain limit, capacity problems might arise in telecommunications cells of the mobile network where GSM-gateways are installed, and additional network upgrade measures are necessary.

The extensive use of GSM-gateways by alternative providers was the subject of disputes between MTOs and alternative providers in 2004. EETT, following complaints from alternative providers, held Hearings and issued 5 Decisions<sup>4</sup>, whose content is detailed below. In the issuing of the relevant Decisions, EETT also took into account the results of a relevant Public Consultation conducted at the end of 2003 where comments from 16 bodies were received.

Hearing of VODAFONE, following complaints of ALGONET, FORTHNET, LANNET, NET ONE, TELEPASSPORT, TELEDOME and VIVODI

In July 2003, VODAFONE had informed providers ALGONET, FORTHNET, LANNET, NET ONE, TELEDOME, TELEPASSPORT and VIVODI that it was about to modify the charges of business packages used by alternative providers for the routing of calls to its network. The modification was related to a charge increase from € 0.087/ minute to € 0.186/ minute (for calls to VODAFONE mobiles) in the cases where traffic would exceed 1,000 minutes per month per subscription.

Following complaints by the above-mentioned

providers, EETT summoned VODAFONE to a Hearing under the Interim Measures procedure and subsequently, in October 2003, issued the Decision by which VODAFONE was called upon not to apply this commercial policy until the issue of the final Decision.

Subsequently, EETT invited all providers to a Hearing in March 2004, in order to examine whether the pricing policy proposed by VODAFONE opposed the provisions of the telecommunications and competition legislation as well as to possibly take measures to resolve the situation.

The relevant analysis of EETT led to the following conclusions:

- ➤ The increase of tariffs by VODAFONE for the provision of services to alternative providers acting as resellers constituted a violation of the telecommunications legislation<sup>5</sup> and the legislation on the protection of competition<sup>6</sup>.
- Consumers would be seriously affected as a result of that increase.
- The traffic served through GSM-gateways was demonstrating high increase at that period and corresponded to a high percentage of voice telephony traffic of alternative providers.
- It was found out that consumers were not fully informed about the quality of services provided through the GSM-gateways.
- ➤ The increased use of GSM-gateways due to high termination fees to MTOs networks created significant market distortions, while it failed to contribute to the smooth growth of the domestic telecommunications sector.
- VODAFONE had the right to require additional terms to the service resale agreements for the protection of its network. These terms, however, should not result in the direct or indirect refusal to provide call termination to its network through GSM-gateways.

<sup>&</sup>lt;sup>4</sup> EETT Decisions 318/44/2004, 332/135/2004, 305/53/2004, 305/54/2004 and 305/55/2004.

<sup>&</sup>lt;sup>5</sup> Article 8(3) of Law 2867/2000 in conjunction with PD 165/99 and EETT Decision 275/72B/2003.

<sup>&</sup>lt;sup>6</sup> Provision of Article 2 of Law 703/77.

It is noted that VODAFONE stated in May 2004 that it would not apply the new pricing policy. Taking all the above into account, EETT set the following by means of its Decision<sup>7</sup>:

- VODAFONE may not unreasonably refuse to terminate a call delivered to its network through GSM-gateways.
- VODAFONE may require from alternative providers to submit traffic forecasts for each GSM-gateway they use. In cases where it is evidenced that congestion problems might arise to its network, VODAFONE may request that these providers proceed to the immediate geographic scattering of GSM-gateways, causing congestion problems.
- Alternative providers must inform their subscribers about the quality of services provided through GSM-gateways. This information should at least include the following:
  - Provision or otherwise of Calling Line Identification (CLI).
  - Increased possibility for call failure.
  - Longer time for call restoration.
  - Reduced voice quality to caller and called.

Finally, EETT made a Recommendation to VODAFONE to avoid similar actions in the future, which are not in line with the telecommunications legislation and the legislation of competition and reserved with a warning for imposing further sanctions in case of noncompliance with its Decision.

Interim Measures Hearing against TIM HELLAS following a Complaint of the SATPE Association and VIVODI

In June 2004, TIM HELLAS announced on its website its intention to gradually transfer connections from the existing business packages to the new business packages "B Best Benefit" from 11<sup>th</sup> August 2004. The main characteristics of the new package were:

- Reduction of charge on VPN calls (calls between a closed group of subscribers of TIM HELLAS, with the use of a 4-digit number), from € 0.096 /minute to € 0.06 /minute.
- Increase of the charge for calls from TIM HELLAS mobile to TIM HELLAS mobile with the use of a 10-digit number from € 0.096/ minute to € 0.18/ minute.
- ➤ Reduction of the charge for calls from TIM HELLAS mobile to COSMOTE and VODAFONE mobiles from € 0.21/ minute to € 0.18/ minute.

Following relevant complaints from the Greek Association of Licensed Telecommunications Providers of Greece (SATPE) and VIVODI, EETT summoned TIM HELLAS to a Hearing under the Interim Measures procedure and issued a Provisional Order to prevent it from implementing the above package policy as regards alternative providers until the issue of the Decision. EETT subsequently decided to adopt Interim Measures in order to call upon TIM HELLAS to refrain from applying the changes to alternative providers until the issue of its final Decision. In the Interim Measures Decision, EETT also took into account the following:

- The acceptance or at least the tolerance of GSMgateways by MTOs in combination with keeping Interconnection fees high, in any case leads alternative voice telephony providers to depend on MTOs.
- Due to the high Interconnection fees and the extremely good prices achieved from the use of GSM-gateways, alternative voice telephony providers consider it more appropriate to waive their rights on the Interconnection.
- TIM HELLAS considered appropriate to fully integrate its strategy to alternative providers or at least take advantage of the conditions created with its tolerance, by changing its policy, but not by following a gradual increase of its commercial

<sup>7</sup> EETT Decision 318/44/2004.

<sup>8</sup> EETT Decision 332/135/2004.

offers. The later, in combination with a reduction in Interconnection prices, would not lead to an abuse of its relation of dependence with alternative providers.

The most important points of that Decision were:

- ➤ The intention of TIM HELLAS to increase the prices for the provision of services to alternative providers, who were acting as resellers, constituted a violation of the telecommunications legislation and a violation of the relevant provisions on the protection of competition 10.
- A result of the aforementioned increase would cause irreversible damage to the complainants.

The final Decision of EETT on the above case is expected to be issued in 2005.

Interim Measures Hearing against COSMOTE, TIM HELLAS and VODAFONE following Complaints from Alternative Providers

In the period from October – November 2003, the providers COSMOTE, TIM HELLAS and VODAFONE informed their customers of their intention to adjust charges of bussiness packages as follows:

- ➤ COSMOTE: calls to COSMOTE mobiles from € 0.0738/ minute to € 0.096/ minute, with minimum duration charge per call being 30 seconds instead of 20 seconds.
- ➤ TIM HELLAS: calls to TIM HELLAS mobiles from € 0.072/ minute to € 0.096/ minute, with minimum duration charge per call being 30 seconds instead of 20 seconds.
- VODAFONE: calls to VODAFONE mobiles from € 0.078/ minute to € 0.096/ minute, with minimum duration charge per call being 30 seconds instead of 20 seconds.

Also, COSMOTE and VODAFONE announced the creation of new bussiness packages.

Following the above announcements, EETT received the following complaints from the alternative providers in relation to the aforementioned modifications:

- Complaint of ALGONET against COSMOTE and VODAFONE.
- Complaint of FORTHNET and TELEPASSPORT against VODAFONE.
- Complaint of NET ONE and TELEDOME against COSMOTE, TIM HELLAS and VODAFONE.

The relevant Hearings were held on 10 March 2004.

EETT issued a Provisional Order for each Hearing so that, until the issue of the Interim Measures Decision, COSMOTE, TIM HELLAS and VODAFONE would not proceed to any actions which would directly or indirectly constitute a refusal to the provision of services, especially in relation to contractual terms contained in previous agreements made with providers.

EETT Interim Measures Decisions<sup>11</sup> were negative and they were based on the fact that the increase in tariffs for the provision of services to alternative providers would not cause irreversible damage to the complainants, neither it would constitute an emergency for the prevention of immediately impending risk. The final Decision of EETT on the above case is expected to be issued in 2005.

#### 4.1.2. Leased Lines

Leased Lines are of significant importance for the establishment of competition and market growth, given their decisive role at the following areas:

- (a) In the development of backbone networks of telecommunications providers.
- (b) In the implementation of Interconnection links between telecommunications providers.
- (c) In the provision of Access, mainly to broadband services.

<sup>&</sup>lt;sup>9</sup> Article 8(3) of Law 2867/2000 in conjunction with PD 165/99 and EETT Decision 275/72B/2003.

<sup>10</sup> Article 2 of Law 703/77.

EETT Decisions 305/53/2004, 305/54/2004 and 305/55/2004.

Therefore, the provision of Leased Lines according to the legislation in force constituted a major priority for EETT.

In this context, EETT took systematic and coordinated actions in 2004 in order to ensure the implementation of the relevant regulatory framework by OTE, which holds SMP in the Leased Line Market. These controlling actions were done ex officio by EETT and focused on the Leased Lines that were used at the following cases:

- a) For OTE's Interconnection with the remaining fixed and mobile telephony providers (Interconnection Leased Lines).
- For the materalization of backbone networks of alternative providers.
- For the provision of access and services by alternative providers to their customers.

This exercise included the collection of information from all providers relevant to the provision of Leased Lines by OTE. Following information and complaints submitted by the providers, OTE was summoned to a Hearing in order for EETT to investigate potential violations of OTE's relevant obligations, and mainly in relation to:

- Delivery times of Leased Lines.
- Delivery procedure.
- Information about the provision of Leased Lines (delivery times, cost, etc.).
- Times for the restoration of faults and relevant procedure for the information of providers.
- Contractual terms for the provision of Leased Lines between OTE and providers.
- Imposition of forfeit fine clauses.
- Transparency of tariffs.

EETT is now at the last stage of processing the Hearing data and is expected to take a Decision in early 2005.

#### 4.1.3. Carrier Pre-Selection

The implementation of Carrier Pre-Selection (CPS) has been introduced in the telecommunication market since 2003 and had a great appeal to consumers (see

subsection 2.2.2.). It also raised a number of issues that required the intervention of EETT. The most important of them were related to win-back campaigns since the relevant issues were not precisely defined in the CPS Regulation<sup>12</sup>. In addition it was necessary to clarify and/or to modify certain issues of the CPS activation and cancellation, in particular related to practical issues of the implementation of the CPS.

Furthermore, certain issues like the implementation of the CPS Regulatory Framework on virtual telecommunications providers needed further clarifications. It is noted that these providers do not have their own telecommunications network, but provide services using the networks of other licensed providers, by using Carrier Selection and/ or Preselection codes assigned by EETT.

Taking the above into account, EETT held a Public Consultation during the period between 6 and 27 October 2004, on the aforementioned issues. During this consultation 12 telecommunications providers submitted their comments and the majority of them agreed that:

- It was necessary to take measures for the limitation of subscriber win-back practices.
- A period should be established during which (following activation of CPS) the old provider could not contact subscribers to win them back.
- The CPS activation application should be submitted to the preselected provider and not to the Notified Body (NB) liable for CPS provision.
- The existing procedures should be improved and automated, especially as regards the submission and processing of the activation, the modification and the cancellation of CPS applications.

The Public Consultation text and the results are available on EETT's website<sup>13</sup>.

Taking into account the above conclusions, EETT made a modification to the Regulation for the Introduction of CPS.

<sup>12</sup> EETT Decision 254/70/2002, GG Issue 773/B/21-06-2002.

<sup>&</sup>lt;sup>13</sup> http://www.eett.gr/gr\_pages/telec/numbering/diavoulevseis.htm (available in Greek only).

According to the new Regulation:

- ➤ The procedure for the submission of CPS applications is simplified.
  - Subscribers can now submit the application for preselected categories of calls/ Activation/ Cancellation/ Change of provider or preselected call categories application not only in printed form but also electronically or over the phone. It is noted that phone calls to the provider for relevant requests may, upon notification of the subscriber, be recorded.
  - All types of Applications (Activation/ Cancellation/ Change of provider or preselected call categories) are now submitted to the provider preselected by the subscriber.
  - The procedure for the processing of the above applications and the exchange of documents between the preselected provider and the NB for CPS provision are carried out electronically.
  - The necessary information to be electronically sent by the preselected provider to the NB, are limited to the full name (or company name), the Internal Revenue Registry Number, or if no such number exists, the ID Card or passport number and the telephone number.
- ➤ The providers must jointly prepare a Telecommunications Services Resellers-Consumers Ethics Code that should cover the relevant issues.
- The framework for the provision of services through CPS by virtual telecommunications providers is clarified.

#### 4.1.4. Number Portability

Number Portability (NP) is one of the main methods for promoting competition in the telecommunication market. Portability releases subscribers from the need to change their number when wishing to change their telecommunications providers. This breaks the dependence relationship between subscribers and providers. The later, in an effort to attract and retain subscribers, improve the variety, quality and prices of provided services.

The provision of this service is now based on the National Reference Database on Number Portability (NRDNP), which supports Portability of all types of numbers (geographic and non-geographic, including mobile telephony numbers). The NRDNP, on which the databases of all providers are connected, processes the exchange of information between provider donor and provider-recipient for the implementation of Portability applications and sends to all providers the information required to route calls to the transferred numbers.

The implementation of the NRDNP is a demanding and complex task which begun in 2003 and it was completed in a very short period of time. The implementation of the Greek NRDNP was a coordinated effort between EETT, the Project Coordinator and the telecommunication providers of both fixed and mobile telephony services. The whole task of the implementation as well as the five-year period operation of the NRDNP has been assigned by EETT to an external consultant, following an invitation to tender held in 2003.

The operation of the NRDNP commenced on 1st March 2004 for mobile telephony NP and it has been extended to fixed telephony NP since June 1st, 2004.

In parallel, EETT defined<sup>14</sup> the transaction costs between providers involved in the provision of NP. More specifically, the processing cost per approved application paid by the provider-recipient to the provider-donor should not exceed:

- € 9.6 for mobile telephony
- €7 for fixed telephony.

<sup>14</sup> EETT Decisions 305/37/2004 and 305/38/2004, GG Issue 422B/02-03-2004.

In the context of its supervisory role, EETT performed ex officio controls in order to ascertain the implementation of the relevant Regulatory Framework by telecommunications providers. Following the above ex officio controls and due also to a number of complaints from subscribers in relation to the NP mode of provision by MTOs (i.e. exclusively through dialing five-digit short codes-see subsection 2.2.3.) as well as the fees charged for Portability, EETT held a Hearing of the four MTOs in September 2004, to investigate potential violations of the telecommunications legislation and the law on competition. The relevant findings are expected to be issued in early 2005.

From the start of the provision of Portability until the end of 2004, 16,123 mobile telephony numbers have been transferred out of a total of 30,637 applications, and 1,156 fixed telephony numbers out of a total of 2,498 applications (see subsection 2.2.3.).

### 4.1.5. Control and Determination of Service Cost

Developments in the telecommunications sector are greatly dependant on technological developments but also on the tariffs for the services provided by SMP providers. These providers must maintain cost accounting systems which constitute the tools to determine the cost elements of telecommunication products/ services and then to specify the relevant tariffs.

There are two models of costing systems known as Top-down and Bottom-up models:

- ➤ The Top-down model is based on accurate cost data. Namely, the calculation of cost for various services starts from the cost entered in accounting books and appearing in cost accounting information (measurements, statistics, times, etc.). This cost is allocated to the basic network services and it is subsequently used to calculate the cost of more complex products and services.
- The Bottom-up model is a financial-technical study through which the network cost for certain types of

services of a telecommunications provider is estimated. The main characteristic of the Bottom-up model is that it achieves optimum design of telecommunication networks aiming at maximum use of their capacity. Bottom-up models are necessary tools both for providers and National Regulatory Authorities (NRAs) since they enable the determination of cost for services and products, even in cases where the cost accounting data are unknown (e.g. in cases of new services, unwillingness or lack of information).

The two main cost accounting methods used in the above models are the method of Fully Distributed Cost (FDC) and Long-Run Averaged Incremental Cost (LRAIC), which can use as a cost accounting basis either the historic or the current cost. The historic cost is the actual cost paid for the purchase of various assets of the provider, which are entered in its accounting systems. The current cost is the cost that would be paid currently for the purchase of the respective assets.

According to the European legislation in force and the practice followed in the EU countries, the responsibility for the control of cost accounting systems of telecommunications providers under the relevant obligation is assigned to the NRAs. On the basis of the applicable Regulatory Framework in Greece, OTE is under such obligation in terms of tariffs in the fixed telephony, Leased Lines, LLU and Interconnection markets. OTE must also submit its cost accounting system for auditing purposes to EETT on an annual basis, following specific schedules, in order to ensure market stability.

## Cost Accounting Audit of OTE with the Use of Top-down Method

In 2004 EETT performed the annual audit of the OTE cost accounting system for voice telephony, Leased Lines, Interconnection and LLU services in order to ascertain compatibility with the obligation for cost-

oriented pricing and the principles of free competition. This was done by independent auditors- chartered accountants selected by EETT after a tender process.

In particularly, the audit performed in the period June –October 2004, had the following objectives:

- To determine the compliance of OTE cost accounting system in accordance to the methodologies approved by EETT (including EETT's proposals for improvements after the previous years annual audits). The above mentioned methodologies are based on the Fully Distributed Cost model, using Current Cost (FDC-CC) as the costing basis for voice telephony and Leased Lines services, and on the Long-Run Average Incremental Cost, using Current Cost (LRAIC-CC) as the costing basis for Interconnection and LLU services.
- ➤ To determine the cost-orientation of tariffs for the services to be regulated in 2004, based on actual data from 2002.

The cost accounting audit of OTE was delayed for about one year, due to delays in the submission of the data to be audited by OTE. In particularly, the submission of data by OTE started in May 2004 and was completed in July 2004, while the proposed retail tariffs were submitted on the 14 December 2004. It is noted that OTE should have submitted the data to EETT in July 2003. For this reason, EETT held a Hearing for OTE, where it ascertained noncompliance with the deadlines laid down in the existing Regulatory Framework and imposed to the company a fine of € 350,000¹⁵.

The results from the cost accounting audit of OTE in

terms of regulated wholesale services were as follows<sup>16</sup>:

- The tariffs for Interconnection services (call collection, call termination, Interconnection portals, signaling channels) were approved as cost-oriented for 2004.
- Similar to previous audits, cost-orientation of Leased Lines tariffs was not proved. Therefore, interim prices were specified for these services until OTE proved cost-orientation.
- ➤ The prices for LLU, CP, NP and Call Transfer services were set.
- The tariffs for busy and non-busy hours for call collection and termination services were allowed to be implemented.

It is also noted that for certain services no sufficient data was submitted by OTE for the calculation of cost-oriented prices through its cost accounting system. For these types of services, EETT set prices on the basis of available data from the audit, using generally accepted at international level methodologies (bottom-up models or benchmarking on the basis of international experience) in order to prevent any omissions on behalf of OTE from further affecting the relevant markets in Greece.

Also, EETT decided not to approve the fixed and monthly fee submitted by OTE for the non-recording service in the directory<sup>17</sup> given that, as it was demonstrated in the audit, the cost of that service had already been integrated and calculated in the fees for the remaining products of the OTE cost accounting system. With respect to this issue, a Hearing was held on the 17 December 2003 and according to the relevant Decision<sup>18</sup>, EETT made a recommendation to

<sup>&</sup>lt;sup>15</sup> EETT Decision 339/40/30-12-2004: With this Decision, EETT also imposed a Fine on OTE standing at €150,000 due to non-performance of its obligation under EETT Decision 301/30/15-12-2003, GG Issue 1925/B/24-12-2003, on the provision of information within the set deadline.

<sup>&</sup>lt;sup>16</sup> EETT Decisions 334/45/2004 (GG Issue 1730/B/23-11-2004), 336/70/2004, 337/73/2004 (GG Issue 1914/B/24-12-2004), and 339/31/2004 (GG Issue 1973/B/31-12-2004).

In accordance to the Law 2774/1999 "on the protection of personal data in the telecommunications sector" (GG Issue 287/A/1999), and especially article 8(2), it is provided that the subscriber may, upon request, not be included in a printed or electronic directory. The service provider may charge those subscribers wishing that their details do not appear in the directory, on the condition that the charge shall be limited to the actual cost for adaptation and updating of the subscribers list whose details will not be recorded in the public directory. The amount and method of payment, as well as any other necessary detail, shall be specified by means of EETT Decision.

<sup>18</sup> EETT Decision 314/129/2004.

OTE for the application of no charge for this service.

It was also decided<sup>19</sup> that OTE could apply the proposed retail pricing policy and in particular its proposals for the following:

- To increase the monthly fees for PSTN lines to €11.40 and for ISDN lines to €14.90.
- To keep unchanged the charges for local and national telephony.
- To keep unchanged the discount scheme OTEPILOGES (remains the same with the already applied one) and the discount scheme OTEPILOGES FREE SPEECH TIME (offers free time depending on the use).
- ➤ To apply a special scheme for pensioners over 65 years old that offers discounts, up to  $\in$  1 per month for local calls and up to  $\in$  0.5 per month for national calls
- ➤ To apply the proposed retail prices for Leased Lines.

Furthermore, the retention fee for calls from the OTE's network to mobile telephony networks was set at  $\[ \in 0.034 \]$  minute (compared to the previous price of  $\[ \in 0.040 \]$  minute). These calls are charged on a per second basis with a minimum charge for 30 seconds.

Finally, for the discount schemes OTEPICHIRO and OTEPICHIROPLUS that are mainly addressed to business customers, OTE failed to provide data in order to evaluate the impact of proposed discounts to competitive services. Therefore, EETT expressed its reservation for a relevant Decision until more data was made available, especially as regards the separation of residential and non residential customers. EETT held a Hearing for OTE on 29 December 2004 according to the Interim Measures procedure. OTE stated at the Hearing that the requested information was not available. EETT is expected to issue a Decision on this matter in early 2005.

### Costing of OTE Services with the Use of Bottom-up Models

In 2003, EETT with the assistance of an external consultant, selected through a tender procedure, performed a study related to the implementation of the bottom-up model on OTE's network, and particularly on the costing of Interconnection services (transfer, collection and termination of calls), LLU and some of the Leased Lines services.

Following the above study, EETT started in 2004 an attempt to expand the bottom-up model to the costing of the remaining types of Leased Lines provided by OTE, the interconnection services for value-added calls, ADSL access services and the provision of Universal Service (US). In this context, EETT requested from OTE to submit certain information about its network. OTE refused to provide the above information and consequently this task was not completed in 2004. EETT held a Hearing of OTE on this matter and the relevant Decision is expected to be issued in early 2005.

### Costing of MTOs Services with the Use of Bottom-up Models

The preparation of the Bottom-up model for the costing of services to mobile telephony networks, that started in 2003 in collaboration with an expert consultant, was completed in 2004. The preparation was based on the collection of information and remarks from MTOs. The collection of providers' comments followed and the model was finalized in June 2004.

In the context of forming the model and integrating the aforementioned comments, a Public Consultation took place in July 2004 in order to define and specify the common cost. The results formed the basis of the

<sup>&</sup>lt;sup>19</sup> EETT Decision 339/31/2004, GG Issue 1973/B/31-12-2004.

final methodology for the specification of common cost and the relevant modification of the model. EETT announced to MTOs the final version of the Bottom-up model in December 2004.

This model calculates network cost in relation to a number of services that includes outgoing traffic to other networks, traffic within the network and incoming traffic from other networks. The method of Long-Run Incremental Cost (LRIC) is used for these calculations that has the following characteristics:

- Uses a demand profile that was constructed based on the number of subscribers and the volume of use.
- Takes into account a network configuration based on algorithms specified by demand and other input parameters including the actual circumstances of each network.
- Calculates total network costs combining the results of the network design, the investment and operating cost.

The results of this model are very important in the EETT work context in order to analyse the level of competition in the market of call termination to mobile networks and to impose obligations to SMP providers. More specifically, the Bottom-up model has the following characteristics:

- ➤ It provides strong indications on the level of competition in the market of call termination to mobile networks. In particular, by using the model on the market, significant deviations were found out between the cost for call termination and existing termination fees. This implies that the specific market is not competitive.
- It enables the identification of the target price for fees in cases where identification is made on the basis of a cost-oriented or reasonable price.

Using this model, EETT ensures that its regulatory

policy with respect to the amount of termination fees for calls to mobile networks is based on objective foundations and protects in the best possible way the interests of mobile and fixed telephony users.

# 4.2. Regulatory Interventions based on the New Framework

The new Regulatory Framework of the European Commission on Electronic Communications requires that each NRA identifies the individual markets, taking into account the national market conditions. Subsequently, the NRA must perform an analysis to ascertain effective operation in each one of those markets. Where it is ascertained that an individual market is not competitive enough (market failure), the NRA must identify the SMP provider(s) in that market and either impose the necessary obligations or maintain/modify the existing ones.

Individual markets, as identified in the European Commission Recommendation<sup>20</sup> in relation to markets of products and services within the electronic communications sector, which are subject to regulation, are shown in Table 18.

In this context, EETT's actions have been focused on two directions:

- Competition analysis for the market of call termination to mobile telephony networks (started in 2003).
- 2. Competition analysis for the remaining markets (started in 2004).

# 4.2.1. Market Analysis of Call Termination to Mobile Telephony Networks

With respect to the provisions of the new Regulatory Framework of the European Commission, EETT has

<sup>&</sup>lt;sup>20</sup> European Commission's Recommendation of 11 February 2003. C(2003) 497 (Recommendation on product and services market within the electronic communications sector susceptible to ex ante regulation in accordance with Directive 220/21/EC of the European Parliament and of the Council on a common regulatory framework for electronic communications networks and services).

identified and analyzed the level of competition in the market of call termination to mobile telephony networks. This was conducted according to the Guidelines of the European Commission for market analysis and SMP evaluation.

EETT has proposed to define the market of call termination to mobile networks as a separate market for the network of each MTO (i.e. COSMOTE,

Q-TELECOM, TIM HELLAS and VODAFONE) and then to designate each company in its network as an SMP Organization in that particular market. In a Public Consultation held in September 2003 the market definition and analysis were submitted to the market factors' judgement. Six (6) telecommunications providers participated in this Public Consultation and half of them agreed with the views and analysis of EETT.

#### Table 18

#### **Individual Electronic Communications Markets**

- 1. Access to the public telephone network at a fixed location for residential customers
- 2. Access to the public telephone network at a fixed location for non-residential customers
- 3. Publicly available local and/ or national telephony services provided at a fixed location for residential customers
- 4. Publicly available international telephony services provided at a fixed location for residential customers
- 5. Publicly available local and/ or national telephony services provided at a fixed location for non-residential customers
- 6. Publicly available international telephony services provided at a fixed location for non-residential customers
- 7. Minimum set of Leased Lines (up to 2Mb/sec)
- 8. Call Origination from the public telephone network provided at a fixed location
- 9. Call Termination on individual public telephone networks provided at a fixed location
- 10. Transit services in the fixed public telephone network
- 11. Wholesale Unbundled Access to metalic loops and sub-loops for the purpose of providing broadband and voice services
- 12. Wholesale broadband access (bitstream and potentially other similar except 11 and 18)
- 13. Wholesale terminating segments of Leased Lines
- 14. Wholesale trunk segments of Leased Lines
- 15. Access and call origination on public mobile telephone networks
- 16. Voice call termination on individual mobile networks
- 17. The wholesale national market for international roaming on public mobile networks
- 18. Broadcasting transmission services and networks which deliver broadcast to end users

EETT, taking into account the conclusions of the above Consultation, proposed a number of regulatory obligations. The most important ones are the provision of access and use of special network facilities, the transparency and non-discriminatory treatment as well as the publication of Reference Offer and price control.

Issues of the specific market and the proposed obligations were posed in a Public Consultation during the period from 11 February to 18 March 2004. Thirteen (13) telecommunications providers participated in this Consultation and 75% of them agreed with the views of EETT. EETT, taking into account the results of the Consultation, announced its final position in relation to the imposed regulatory obligations. In particularly, the obligation for price control was defined on the basis of cost-oriented prices for COSMOTE, TIM HELLAS and VODAFONE and on the basis of a reasonable price for Q-TELECOM.

In accordance to the new Regulatory Framework and in order to ensure that Decisions at national level do not cause an adverse impact to the common European market, the NRAs are required to communicate to the European Commission and the other NRAs the drafts of regulatory measures that they intended to impose. The NRAs may discuss with the European Commission every Draft Measure that they intend to impose before they officially communicate it.

In this context, EETT sent on 1st of July 2004 to the European Commission a Draft Measure related to the market of voice call termination to individual mobile networks. The European Commission communicated<sup>21</sup> back to EETT its positions in relation to the aforementioned Draft Measures in August 2004. The remarks focused on the following issues:

> On the clemency of the measure for the gradual

- reduction of termination fees over a period of three years, as it was also proposed by EETT. European Commission stressed the need to review the duration of this measure, due to high termination fees to mobile networks.
- On the necessity of immediate imposition of the obligation for accounting separation in addition to the other proposed obligations and verifying compliance with the obligations for nondiscriminatory treatment.
- On the review of the reasonable price obligation for Q-TELECOM in the next market analysis.
- On the more adequate reasoning that within the context to avoid discriminatory treatment, the confrontations with issues entailing the use of GSM gateways is precluded, and in any case it consists a necessary element, without whom the imposed cost orientation obligation on the relevant market is ineffective.

It is noted that the European Commission in relation to the proposed measure on the obligation for price control in call termination fees to mobile networks points out that "the very high termination fees in Greece have caused an imbalance between wholesale and retail fees and they must be effectively adjusted as soon as possible". European Commission has also mentioned that "in this context, EETT is called to review the clemency of the gradual application of the measure as proposed in this case".

Having taken the remarks of the European Commission into account, EETT reviewed the Draft Measure. The new Draft will be communicated to the interested parties under a Public Consultation that will be completed in early 2005. The Consultation results and the Draft Measure are published on the EETT website<sup>22</sup>. Subsequently, the results of the Consultation will be taken into account and the Draft Measure will be communicated again to the European Commission.

<sup>&</sup>lt;sup>21</sup> In accordance with article 7(3) of the Framework Directive.

<sup>&</sup>lt;sup>22</sup> http://www.eett.gr/gr\_pages/telec/AnalisiAgoron/ (available in Greek only).

Finally, EETT, following completion of the last phase of Communication and with the transposition of the new Regulatory Framework in the Greek legislation, will be in the position to proceed to the imposition of obligations described in the draft provision.

#### 4.2.2. Analysis of Other Markets

Following a tender in 2004, EETT assigned to an independent consultant the preparation of a study on the identification and analysis of the level of competition in all electronic communication markets, except the one of voice call termination to individual mobile networks (Market 15 according to Table 18).

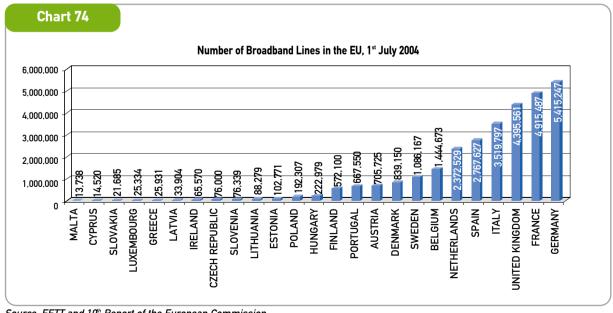
At the same time, EETT continued the collection, processing and checking of quantitative and qualitative data in relation to the progress of the electronic communications market in Greece and the competition level of this market (see Section 4.6.). This preparatory work is very important for the quick completion of the market analysis, since it minimizes the time required to collect the necessary data.

In addition, EETT grouped the markets shown in Table 18 and selected those markets where priority will be given, taking into account the national conditions of those markets and the completeness of the data collected. The markets selected for immediate intervention were those of broadband access and wholesale Interconnection. The identification and analysis of competition in those markets is expected to be complete in the first half of 2005, while the analysis of all remaining markets will have been completed by the end of 2006.

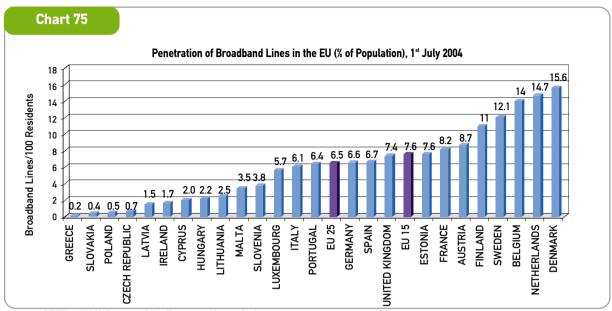
### 4.3. Actions for Broadband Development

#### 4.3.1. Broadband in Greece

According to the 10<sup>th</sup> Report of the European Commission (see subsection 7.1.4.), Greece lags significantly in broadband access behind the other EU member states. This lag is shown in Charts 74 and 75 presenting the penetration of broadband lines in Greece as compared to other EU member states at the end of the first half of 2004.



Source: EETT and 10th Report of the European Commission

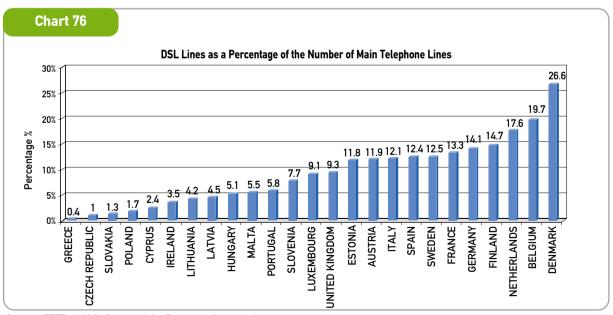


Source: EETT and 10th Report of the European Commission

This lag is due to three main factors. The first two are related to the significant delay in the development of LLU and ADSL markets, which is reflected in the number of ADSL lines, as shown in Chart 76. It is noted that out of all broadband lines, 78% corresponds to ADSL lines-including LLU (July 2004 data).

The third factor is related to the absence of Cable

Television (CATV) networks in Greece. Those networks form an important part of the European broadband infrastructure and correspond to about 20% of broadband lines in the EU. It is noted that the remaining 2% of EU broadband lines mainly relates to satellite links and fiber-optic connections while the contribution of Fixed Wireless Access (FWA) is extremely low.



Source: EETT and 10th Report of the European Commission

The following subsections present the actions taken by EETT in 2004 in order to develop the broadband market based on the existing regulatory framework.

#### 4.3.2. Unbundled Access to Local Loop

The critical role of broadband access in the promotion of electronic communications services and the significant delay observed in the Greek market, have led EETT to hold a meeting in June 2004 on the implementation and problems faced in the provision of LLU and ADSL access. All the companies that had expressed their interest in the aforementioned services, including OTE, attended the meeting. The outcome of the meeting was the set up of a "Collaboration Group for LLU Development", with the participation of EETT, OTE and those providers who have signed contracts with OTE for the provision of LLU.

The "Collaboration Group for LLU Development", that was chaired by EETT, was holding regular meetings in 2004 in order to examine the main problems in LLU provision, as they were highlighted by interested providers at the meetings. The results of these meetings can be summarized as follows:

#### **Provision of Information**

With respect to this issue OTE either failed to provide with the alternative providers the necessary information for the development of their business plans in relation to LLU or this information was provided with unaccepted delay. The Group decided that OTE would provide the information about the geographic boundaries of local exchanges that providers characterized as of top priority, as well as prepare and update a directory with local exchanges where external Optic Network Fibers have been installed and operate.

#### **Provision of Collocation and Local Loops**

OTE has committed to create a ditch dedicated to alternative providers in order to distribute the cost and to facilitate common use of the main local exchange centre by many providers. In addition, contacts were made between providers and OTE to resolve issues related to the implementation of Physical Collocations considering the significant problems that were faced in the implementation of provisions included in the existing Reference Unbundled Offers (RUO).

#### **Copper Management**

The interested parties agreed on the need to prepare a Spectrum Management Plan for the copper infrastructure of OTE's access network. However no agreement was reached in relation to the management of copper cables that are replaced by Optical Fibers.

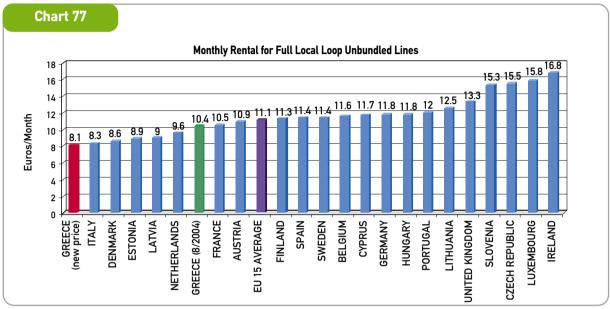
#### Service Level Agreements (SLA)

The issue was discussed but no progress was made. Despite the operation of the Collaboration Group and the improvement of OTE's behaviour in relation to individual provisions of the Reference Offers (i.e. reliability of provided information and level of cooperation), several providers continued to face delays in the delivery of local loops. In addition they faced cases of refusal or unjustified impediments in the implementation of the collocation procedures. Therefore, EETT summoned OTE to a Hearing in December 2004 on those issues. The Hearing is expected to take place in early 2005.

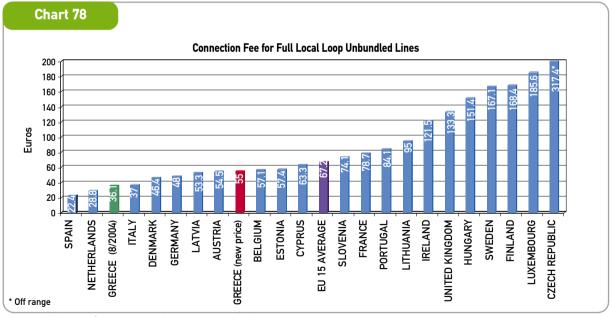
It is noted that the cost accounting of OTE (see subsection 4.1.5.) led to the readjustment of LLU prices. This readjustment is expected to contribute further to the development of the relevant markets. In particular, the monthly rental for the Full Local Loop Unbundled Lines was further reduced (Chart 77) even though it was lower than EU average. The conection fee for new

line connections, that was one of the lowest in the EU, was increased (Chart 78). Accordingly, the monthly rental for the Shared Local Loop Unbundled Lines was

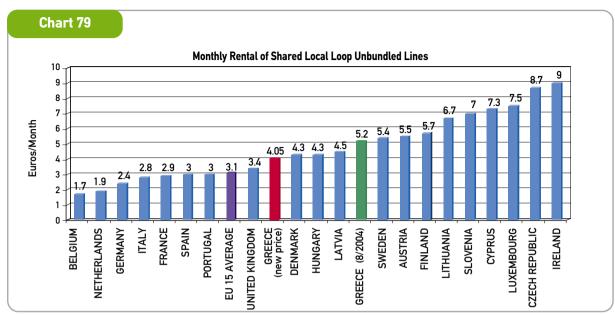
reduced, approaching the EU average (Chart 79), while the connection fee was increased, also approaching the EU average (Chart 80).



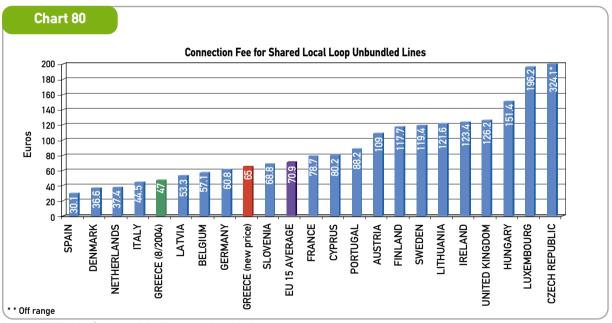
Source: EETT and 10th Report of the European Commission



Source: EETT and 10th Report of the European Commission



Source: EETT and 10th Report of the European Commission



Source: EETT and 10th Report of the European Commission

The progress of LLU lines in Greece is shown in subsection 1.1.5.

EETT's target for 2005 is the full compliance of OTE with its obligations, -as laid down in the Reference

Offer and the provisions of law of competition-, as well as the improved collaboration between OTE and the interested telecommunications providers in order to achieve greater broadband penetration through LLU.

#### 4.3.3. ADSL

As a result of the meeting that took place in order to examine the progress of implementation and the individual problems faced in the provision of LLU and ADSL access (see subsection 4.3.1. and Chart 76), the set up of a "Collaboration Group for ADSL Access" was decided. EETT, OTE and the providers who have signed relevant contracts with OTE would participate at this group.

The Group has focused its activities on the problems faced by interested providers in the provision of ADSL access by OTE. The results of these works can be summarized as follows:

#### "Port" Availability

OTE announced that the "port" availability (from its own stock) problems has been almost eliminated and reviewed its initial intention to interrupt the provision of information to interested providers in relation to "port" availability per local exchange centre.

#### **Marketing of ADSL Access**

The main issues related to the marketing of ADSL access were recorded and discussed as they were posed by the providers. The list includes issues like the low discount on wholesale prices, the twelve-month obligation to pay the wholesale service despite not being a similar term for retail service, and the provision of technical support for wholesale and retail service through a common number. OTE recognized the need to differentiate technical support for the wholesale service, but opposed all other issues.

#### **Provision of Service Quality Guarantee by OTE**

EETT placed particular emphasis on the issue of service quality guarantees by OTE so that the interested providers can offer differentiated services as well as guaranteed quality of services. Regarding this issue OTE avoided to refer to the quality of its services and make any commitments.

#### **Provision of Access with Own Means**

The issue was discussed but no progress was made. According to the existing legislative framework in Greece, ADSL access is considered as a special type of access and the power of EETT to intervene in the ADSL market is significantly limited. Therefore, the relevant ADSL access offer of OTE is not subject to EETT approval. Nevertheless, as it was also found out from the discussions at the relevant Collaboration Group, ADSL access needs significant improvements, especially regarding the clarity of procedures, the provided services (range, quality, etc) and time schedules as well as the non-compliance clauses.

Two Hearings of OTE were held in the second half of 2004 in relation to ADSL access. The first one was related to FORTHNET request for adoption of Interim Measures as regards the release of the Conn-x package by OTE, where EETT rejected that request, since no immediately impending risk for irreversible damage was proved. The second Hearing was held after a complaint from TELLAS mainly related to the review of price squeeze due to the low discount in the wholesale prices as compared to retail prices. The final Decisions of EETT on the above are expected to be issued in early 2005.

The progress of ADSL lines in Greece is shown in subsection 1.1.5.

The target of EETT for 2005 is the full compliance of OTE with its obligations and the improved collaboration with the interested providers in order to achieve greater penetration of broadband through ADSL access.

#### 4.3.4. Wi-Fi

Wi-Fi (Wireless Fidelity) is a wireless local area network which uses radio frequencies to transmit and receive data and is based on the IEEE 802.11 family of standards. In recent years, Wi-Fi are internationally used in various sectors such as health and education as well as from residential users, universities, offices, etc. The easy installation of a Wireless Local Area Network (W-LAN) is one of the main factors contributing to the rapid development of such networks.

These wireless networks are widely spread in Greece. EETT, following the principle of technology neutrality, keeps a positive attitude towards the expansion of this type of networks since they are expected to substantially contribute to the development of broadband services as well as to the penetration of the Internet and the general networking of remote and isolated areas.

Via the necessary EETT regulatory interventions the market development of such networks is rendered feasible. This will offer subsequent benefits to the average consumer in terms of variety, quality and prices for different services.

Under the existing legal and regulatory framework the development of W-LAN for own use is excluded from licencing, while the commercial operation of wireless networking technology (except of FWA services) is allowed upon granting of an Individual Licence.

The rapid spread and the particular importance of these networks requires the revision of the existing legislation. The later is essential for the appropriate adjustment of the regulatory framework and for dealing with various issues, so that this technology offers a greater and easier access to Information Society.

EETT held a Public Consultation on W-LAN in the period between 5 August to 30 September 2004. The main object of this consultation was to record the views of interested parties in relation to the consequences of W-LAN operation in the Greek market and the possibility to allow the provision of

services to the public with the use of this technology (ETSI, EN 300 328) for FWA implementation. At the Consultation text it was pointed out that in December 2000 the FWA Licences for the frequency zones of 3.5 GHz and 26 GHz were granted through an auction process.

Twenty-one (21) interested parties participated in the Consultation whose main conclusions are summarized below:

- Half of the participants agreed in general with the provision of FWA services in the 2.4 GHz zone, while 40% of them disagreed.
- ➤ About 55% of participants supported the limitation of the FWA services to the 2.4 GHz zone -if this is allowed- to non-urban areas only.
- ➤ Regarding the quality of services provided, 55% supported the view that there can be no guaranteed quality, while 40% expressed the opinion that existing quality is satisfactory taking into account parameters such as the type of service, the number of users, etc.
- The majority of participants pointed out that the service providers should inform the users on the quality of the services provided.
- The vast majority of the participants expressed the opinion that W-LAN networks may constitute, under certain conditions, a reliable and sustainable way to offer telecommunication services.
- There were divergent opinions in terms of offering a guaranteed quality of the services provided. Regarding this issue, 40% of the participants expressed the opinion that the quality of services provided to users could be subject to interference since W-LANs operate in unlicensed spectrum. However, about 33% of the participants believed that quality could be ensured with the establishment of provisions and technical specifications. In addition, 22% expressed the opinion that quality could only be ensured with licensing or limitation of spectrum use.

The Public Consultation text and the relevant results are available on EETT's website<sup>23</sup>.

# 4.4. Promotion of Internet Electronic Services

#### 4.4.1. Electronic Signature

Regarding the issue of Electronic Signature, EETT completed in 2004 the regulatory framework for the Voluntary Accreditation (VA) of Certification Service Provider (CSP) in Greece.

In that context, CSPs interested in receiving voluntary accreditation should select a Designated Body (DB), authorized by EETT to perform the necessary audits to ascertain compliance with VA criteria.

Aiming at the faster implementation and operation of VA, and having taken into account that the market of Electronic Signature certification services is not adequately developed and competitive, EETT decided<sup>24</sup> to adopt the electronically Signed List for the implementation of a Registry of VA providers. This means that the voluntarily accredited CSPs as well as their details and the services for which they have received accreditation shall be registered in an electronic list accessible from EETT's website. This list shall be managed and signed by EETT, ensuring authenticity and integrity of its content.

As a next step, EETT published an invitation for tender in order to identify those DBs which will be responsible for the following tasks:

- a) To ascertain compliance of Electronic Signature products (i.e. secure signature devices like smartcards, etc.) - with Presidential Decree (PD) 150/2001 and compliance of the secure codification units with Annex III and II(f) of PD 150/2001).
- b) To ascertain compliance of CSPs with VA criteria.

Following the aforementioned invitation, a number of informative meetings took place with the bodies which expressed their interest to participate in the process.

In order to achieve a greater expansion of the use of Electronic Signature. EETT informed the Ministry of Economy and Finance, the Union of Greek Banks and other public and private bodies about general issues associated with the Electronic Signature such as the existing regulatory framework, and especially the VA procedure.

In addition, EETT introduced the use of Electronic Signature in the procedure of submitting the applications to the Registry of Domain Names holding the [.gr] suffix by the Registrars. Accordingly, it introduced the use of Electronic Signature in the procedure of submitting the applications for Carrier Pre-Selection (CPS) by subscribers. EETT has also set up and operates a Private Certification Authority for the issue and use of Digital Certificates for the internal correspondence of its staff.

During 2005, EETT will focus its efforts on the implementation and operation of the electronically Signed List for the support of CSP VA. EETT is also going to continue the promotion and dissemination of Electronic Signatures in Greece. The operation of VA is expected to create the necessary framework for the provision of high-level services in terms of security and quality. This is going to encourage the use of Electronic Signature and support consumers' confidence in electronic communications and commerce.

#### 4.4.2. Domain Names holding the [.gr] Suffix

Under the EETT's responsibilities with respect to Internet issues, and according to the Regulation specifying the procedures for the assignment of Domain Names holding the [.gr] suffix, the operation of the "Registrants- Registrars-Registry" scheme started on 5th April 2004.

 $<sup>^{23}\</sup> http://www.eett.gr/gr\_pages/telec/adeiodotisi/\ (Available\ in\ Greek\ only).$ 

<sup>&</sup>lt;sup>24</sup> EETT Decision 308/37/2004.

The Registry is a database used for the real time submission of applications for the assignment of Domain Names. In addition the Registry keeps the order of submission, and forwards the applications to EETT for approval via an online connection. By using the Registry a more flexible procedure has been achieved which is implemented electronically with the use of approved certificates. EETT, following a tender process, awarded in 2003 the management, expansion and maintenance of the aforementioned Registry for a period of five years to the Foundation for Research and Technology Hellas Institute of Computer Science (FORTH–ICS).

Prior to the start of the operation of the above scheme, the Registrar could only address FORTH-ICS, which acted as the Registrant. Nowadays, the role of Registrant can be taken up by interested ISPs or other private companies. In order to ensure the smooth transition to the new scheme, FORTH-ICS continued acting as a Registrant for a transitory period of ninety (90) days from the commencement of Registry operation. The Domain Names assigned by FORTH-ICS acting as Registrant are still valid until their expiring date.

A brand new market of Registrants was created with the full implementation of the Regulation on the assignment of Names and the operation of the scheme. EETT contributed to the development of competition as follows:

- The compliance with the basic principles of competition is provided.
- > Individuals can act as Registrants.
- ➤ A maximum limit is set regarding the assignment, transfer and renewal of Domain Names<sup>25</sup>.
- EETT intervened through the Hearing process in cases of complaints for violation of basic competition principles.

It is worth mentioning that within few months the number of Registrants reached 230.

In addition, the procedure for the assignment of Domain Names, -detailed in subsection 2.2.5.- is more flexible and simple and the consumers can apply for a Domain Name via e-mail or by filling an application form on the Internet. As a result, the rate of assignment of Domain Names was significantly increased (see subsection 2.2.5.).

The procedures where EETT is involved are the assignment, rejection, deletion and transfer of Domain Names.

#### Public Consultation for the Assignment of Domain Names with Greek Characters

Recognizing the importance of Domain Names with Greek characters for the further development of the Internet, EETT held a Public Consultation in the period between 15 September and 15 October 2004. The main issue was the procedure of assignment of Domain Names with non-Latin and mainly Greek characters as well as any other issues that needed improvement or clarification. In parallel, issues related to distinguishing features of Names in terms of the existing assignment procedure were discussed.

10 bodies participated in the Consultation and the results are expected to be communicated in early 2005.

Following this Consultation, EETT intends to proceed to a modification of the Management and Assignment Regulation for Domain Names holding the [.gr] suffix, in order to make provisions for the assignment of Names with Greek characters. Furthermore, in order to use the experience from the first ten months of operation of the new Name assignment and transfer scheme as well as the results of the above Consultation, EETT will proceed to the necessary actions to improve or clarify the existing procedures.

<sup>&</sup>lt;sup>25</sup> EETT Decision 309/48/2004, GG Issue 525/B/23-03-2004.

# 4.5. Safety and Quality of Electronic Communications Networks and Services

#### 4.5.1. Network Contingency Planning

EETT within the context of its competencies, in an effort to safeguard the uninterrupted provision of services to consumers, has started, in collaboration with an expert consultant who was selected following a tender process, the definition of action plans that cover emergency situations that might occur to telecommunications networks.

These emergency situations may, among others, include the following:

- The increase of telecommunication traffic, either due to anticipated peak periods or special events (e.g. national or religious holidays, international cultural or sports events, crisis situations, natural or industrial disasters) which might be concentrated in specific geographic areas.
- > Failures in telecommunications infrastructures.
- Telecommunication congestion in interconnected networks (national or international).

In an emergency situation, a telecommunication network may be subject to overload (i.e. excess telecommunication traffic as compared to the traffic under which the network is designed to operate) or lose part of its capacity. This means that the network is not able to meet the telecommunications needs of users (e.g. reduced processing capacity and lower than the agreed quality of services to subscribers).

The aim of the project is to specify certain national action plans to deal with contingencies situations. These plans will be analyzed using specific procedures and stages and accurately describing the role of each body. In order to develop the national action plans, the existing contingency plans of telecommunications providers and the international experience are taken into account.

The project is expected to be completed by the end of the first half of 2005, after a Public Consultation in relation to the proposed contingency plans. Participation and wide acceptance of the outcomes by telecommunications providers is critical for its success, since those providers shall be invited to implement the action plans, taking into account the proposed necessary measures.

## 4.5.2. Telecommunications Networks and Services Quality Indicators

The quality of telecommunications networks and the provided services are decisive factors for the selection of a provider in a competitive market. Therefore, the provision of information in relation to network and service quality in a comprehensive, comparable, easily accessible and updated mode is particularly useful for consumers. This is achieved through quality indicators.

Significative examples of indicators are the initial connection delivery time, the frequency of failures per connection and the time of failure restoration, the percentage of missed calls and the time of restoration, the accuracy of bills, etc.

These indicators constitute a useful tool for consumers in the selection of services and providers and contribute to a better understanding regarding the level of services provided. Moreover, indicators act as a motive to providers in order to improve their services for retaining and strengthening their client base.

Given the benefits to consumers and the establishment of competition, EETT decided to prepare a Public Consultation, which shall be held in January 2005, in relation to the above issue for fixed telephony services. The interested bodies, including consumers, shall be invited to express their views and comments on three main subjects:

- a) Quality indicators which, in their opinion, should be used for fixed telephony services.
- b) The exact measurement methodology.
- c) The publication procedure of the relevant results.

## 4.5.3. Safeguarding Universal Service Provision

Safeguarding US provision (i.e. a predetermined ensemble of basic telecommunications services available to all citizens of the Greek territory regardless of their geographic location at affordable prices) is one of the top priorities of EETT.

### Comprehensive Telephone Directory – Comprehensive Directory Enquiry Service

Regarding this issue, the main concern of EETT during 2004 was to ensure that a Comprehensive Telephone Directory would be issued, as well as the provision of a full comprehensive directory enquiry services. This Comprehensive Telephone Directory must include all registered fixed and mobile telephony numbers. The telecommunications providers under the obligation should have kept a particular schedule and certain technical specifications in relation to the provisions of subscribers' details to OTE, which is the Universal Service Provider (USP). The drafting of the schedule and of the specifications had already been finalized from the end of 2003. However, the progress on issuing the Directory was not the expected one due to significant delays in the supply of information to the USP.

Trying to speed up the process EETT held a Hearing in March 2004 of the USP (i.e. OTE), the four MTOs (i.e. COSMOTE, Q-TELECOM, TIM HELLAS and VODAFONE) and a number of the alternative providers (i.e. ACN, ALGONET, FORTHNET, LANNET, TELEPASSPORT, TELLAS and VIVODI). The objective of this Hearing was

to ascertain any violation of the telecommunications legislation regarding the above mentioned issues. By applying the relevant legislation, EETT decided to take the following measures:

- To impose a fine of € 20,000 for violation of the telecommunications legislation on each one of the four MTOs and called upon them to immediately provide the USP with all the necessary information.
- To recommend to the USP and FORTHNET to avoid future actions which are not in line with the telecommunications legislation as well as to call upon FORTHNET to immediately provide the USP with the necessary information for issuing the Directory and providing directory enquiry service.
- To call upon all other alternative providers to supply the information related to subscriber numbers to the USP within the specified deadlines.

#### **Facilities for Disabled People**

EETT, in order to secure social cohesion, has recognized the importance of the participation of all citizens in the Information Society. Therefore, EETT has given particular emphasis on safeguarding the provision of telecommunication facilities for disabled people. It is noted that Greece is placed among those EU member states that have taken initiatives and have adopted suitable measures in the telecommunications services sector, in order to make easier the everyday life of disabled people.

In this context, EETT has examined the degree of compliance of the USP with the applicable special regulations for disabled people. Following a Hearing, EETT decided<sup>26</sup> in March 2004 that the USP failed to comply with all the aforementioned regulations and therefore was acting in violation of EETT Decision<sup>27</sup> in relation to the US content. As a result, EETT imposed a fine of €15,000.

<sup>&</sup>lt;sup>26</sup> EETT Decision 308/44/2004 on the USP Hearing as of 12-09-03 on the ascertainment of violation of the EETT Decision 255/83/2002 "on the specification of the Universal Service Content" (GG Issue 874/B/12-07-2002)

<sup>&</sup>lt;sup>27</sup> EETT Decision 255/83/2002 (GG Issue 874/B/12-07-2002).

#### **Public Telephones**

Regarding this issue, EETT was concerned about the refusal of the USP (i.e. OTE) to provide connections for the installation of public telephones by alternative providers. In this context, EETT held a Hearing of the USP in February 2004 and ascertained that it was violating the telecommunications legislation and the law on competition. As a result, EETT imposed a fine of  $\oplus$  15,000 and invited the USP to avoid any actions that are not in line with the provisions of the telecommunications legislation.

### 4.6. Monitoring of the Telecommunications Market

EETT's actions in 2004 regarding the monitoring of the Greek market were focused on two directions. The first one was related to the collection, processing and analysis of data on the progress of the telecommunication market while the second was related to the gradual development of the organizational and technical infrastructure for the effective monitoring of the telecommunications sector. The importance of those mechanisms is highlighted in view of the new Regulatory Framework on Electronic Communications and the obligations arising regarding the analysis of individual markets in the sector for SMP evaluation.

EETT continued in 2004 to collect data from the telecommunications services providers with the use of detailed questionnaires and to assess the quality of provided data. These data formed the basis of EETT's contribution to the preparation of the European Commission annual report. Furthermore, the data were used for the provision of information on the evolution of the Greek electronic communications market to national and international bodies (i.e. the Ministry of Transportation and Communications (MTC), the EU Statistical Office (Eurostat), the Organization of Economic Cooperation and Development (OECD) and the

International Telecommunication Union (ITU) ).

In addition a significant step towards the implementation of the necessary infrastructure for the monitoring of the market is the development of a database application (see subsection 8.3.1.) for organizing, processing and monitoring the data submitted by telecommunications providers to EETT.

# 4.7. Organization Plan of the Telecommunications Directorate

In 2004 an internal study was performed, on the "Organization Plan of the Telecommunications Directorate". The goal of the above project was to record the existing situation and optimize the organization of the Telecommunications Directorate of EETT, given the implementation of the Organizational chart and the undergoing recruitment of new staff.

In more detail, this study included:

- > The operations and activities of the Directorate.
- ➤ The necessary organizational systems and means for carrying out these operations (regulations, procedures, standard forms, etc.).
- The information archives (electronic or physical) which are managed or are accessible by the Directorate for the effective performance of its operations.
- The organizational structure of the Directorate and the job description of each position, including the mission, the ranking framework, the main duties and the necessary qualifications of each personelle position.

For each organizational system and for each archive, the organizational unit is recorded together with the status (i.e. the improvements that may be necessary for their effective application and use). Finally, a specification of priorities and planning for the implementation or the integration of the organizational means and files is made.

<sup>&</sup>lt;sup>28</sup> EETT Decision 325/269/30-07-2004.

### 4.8. Controlling – Monitoring Actions of EETT

In the context of its controlling and monitoring role under Law 2867/2000, EETT proceeded to the following Hearings in 2004.

	Summary Table of Hearings							
Subject	Petitioner	Defendant	Decision No	Pronouncement				
Investigation of Telecommunications Legislation infringement and especially EETT's Decision 255/83/2002 "Specification of Universal Service content", in relation to special regulations for disabled users	Ex officio	OTE	308/44	Fine: € 15,000				
Investigation of Telecommunications and Competition Legislation infringement by OTE regarding telecommunication Providers Access – Interconnection to OTE network requests, for free of charge, shared cost and premium rate services (special Interconnection services)	- FORTHNET - TELLAS - ALGONET	ОТЕ	308/45	Fine: € 60,000				
Obligation for the provision of subscribers data in order to issue and release a Comprehensive Directory and to introduce Comprehensive Directory Enquiries Service according to USP obligation	Ex officio	VODAFONE	318/40	Fine: € 20,000				
Obligation for the provision of subscribers data in order to issue and release a Comprehensive Directory and to introduce Comprehensive Directory Enquiries Service according to USP obligation	Ex officio	СОЅМОТЕ	318/41	Fine: € 20,000				
Obligation for the provision of subscribers data in order to issue and release a Comprehensive Directory and to introduce Comprehensive Directory Enquiries Service according to USP obligation	Ex officio	TIM HELLAS	318/42	Fine: € 20,000				

Subject	Petitioner	Defendant	Decision No	Pronouncement
Obligation for the provision of subscribers data in order to issue and release a Comprehensive Directory and to introduce Comprehensive Directory Enquiries Service according to USP obligation	Ex officio	INFO QUEST S.A.	318/43	Fine: € 20,000
Investigation of Telecommunications and Competition legislation infringement as regards the installation and operation of public telephones by third undertakings	- KMF INTERNATIONAL LTD	ОТЕ	325/269	Fine: €15,000
Investigation of Telecommunications legislation infringement and especially of the EETT's Decision 206/02/2001 "National Numbering Plan for Telephony Services and Mobile and Personal Communications" provisions	- OTE	ALGONET	329/96	Fine: €15,000
Investigation of Telecommunications legislation infringement and especially of the NNP short codes management Regulation for Telephony Services as well as for Mobile and Personal Communications	Ex officio	OTE	329/97	Fine: €15,000
Investigation of OTE non – compliance with the obligations imposed by means of EETT's Decision 261/142/28-08-2002 "Approval of Reference Interconnection Offer of OTE for 2002", as regards the provision of Interconnection	Ex officio	OTE	337/91	Fine: €15,000
Non-submission of data by OTE in accordance with the stipulations of EETT's Decisions 277/64 (GGI 514/B/02-05/2003) and 301/30 (GGI 1925/B/2003)	Ex officio	OTE	339/40	Fine: € 500,000
Investigation of Infringement on the provided activation procedure for the Carrier Pre-Selection service without the written consent of subscribers	OTE	TELLAS	338/99	Rejection of complaint
Change of shareholder structure without EETT's approval in violation of Law 2867/2000 and the Individual Licences Regulation	Ex officio	TELEPASSPORT	304/70	Recom- mendation

Subject	Petitioner	Defendant	Decision No	Pronouncement
Investigation in relation to the imposition of fees for the non entry service in the telephone directory	Ex officio	OTE	314/29	Recom- mendation
Obligation to issue and release a Comprehensive Directory and to introduce Comprehensive Directory Enquiries Service in order for the USP to fullfill its obligations	Ex officio	OTE	318/39	Recom- mendation
Obligation for the provision of subscribers data in order to issue and release a Comprehensive Directory and to introduce Comprehensive Directory Enquiries Service. Introduction of telephone directory service in order for the USP to fullfill its obligations	Ex officio	FORTHNET	328/102	Recom- mendation
Investigation of Individual Licence conditions, Law 2867/2000 provisions and Individual Licences Regulation infringement	Ex officio	ALPHA SYNTHESIS DIGITAL S.A. (A.D.S. S.A.)	328/94	Recom- mendation
Investigation of OTE Basic Rate Access (BRA) ISDN connection infringement	Ex officio	ОТЕ	338/94	Recom- mendation
Telecommunications and Competition legislation compatibility review of the new Vodafone business package released on 16-07-03 (GSM- Gateways)	- ALGONET - FORTHNET - TELEPASSPORT - TELEDOME - NET ONE - LANNET - VIVODI	VODAFONE	318/44	Recom- mendation
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name opensource.gr	P. THOMAIDIS (NET PLANET)	MEDIA POWER LTD	337/94	Recom- mendation
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement	Ex officio	ACN S.A.	338/96	Recom- mendation
Greek TELECOM vs. OTE dispute resolution	GREEK TELECOM	ОТЕ	308/66	Archived/ Cancellation - Revocation

Subject	Petitioner	Defendant	Decision No	Pronouncement
Investigation of Law 2867/2000 infringement in relation to a subscriber account charges		OTE	325/263	Archived/ Cancellation - Revocation
Change of share composition- control- Acquisition of 60% of shares in COM QUEST (HELLAS ON LINE) by EFG EUROBANK ERGASIAS	Ex officio	COM QUEST	328/103	Archived/ Cancellation - Revocation
Investigation of Competition legislation infringement by OTE offering an ISDN connection with a three-month dialup Internet connection by OTENET	HELLAS ON LINE (COM QUEST)	- OTE - OTENET	328/104	Archiving/ Cancellation - Revocation
Investigation of Competition legislation infringement by OTE offering an ISDN connection with a three-month dial up Internet connection by OTENET	FORTHNET	- OTE - OTENET	328/105	Archived/ Cancellation - Revocation
Interim Measures Adoption Request – Dispute on Interconnection fees	TELEDOME	ОТЕ	328/106	Archived/ Cancellation - Revocation
Non-provision of network traffic information	Ex officio	ОТЕ	308/62	Archived/ Cancellation - Revocation
Non-provision of network traffic information	Ex officio	COSMOTE	308/63	Archived/ Cancellation - Revocation
Non-provision of network traffic information	Ex officio	VODAFONE	308/64	Archived/ Cancellation - Revocation
Investigation of changes in share capital composition	Ex officio	- GRAPES HELLAS - INTERSAT	308/65	Archived/ Cancellation - Revocation
Obligation for the provision of subscribers data in order to issue and release a Comprehensive Directory and to introduce Comprehensive Directory Enquiries Service according to USP obligation	Ex officio	ALGONET	328/99	Non- imposition of penalties

Subject	Petitioner	Defendant	Decision No	Pronouncement
Obligation for the provision of subscribers data in order to issue and release a Comprehensive Directory and to introduce Comprehensive Directory Enquiries Service according to USP obligation	Ex officio	LANNET	328/98	Non- imposition of penalties
Obligation for the provision of subscribers data in order to issue and release a Comprehensive Directory and to introduce Comprehensive Directory Enquiries Service according to USP obligation	Ex officio	TELEPASSPORT	328/97	Non- imposition of penalties
Obligation for the provision of subscribers data in order to issue and release a Comprehensive Directory and to introduce Comprehensive Directory Enquiries Service according to USP obligation	Ex officio	TELLAS S.A.	328/96	Non- imposition of penalties
Obligation for the provision of subscribers data in order to issue and release a Comprehensive Directory and to introduce Comprehensive Directory Enquiries Service according to USP obligation	Ex officio	ACN	328/100	Non- imposition of penalties
Obligation for the provision of subscribers data in order to issue and release a Comprehensive Directory and to introduce Comprehensive Directory Enquiries Service according to USP obligation	Ex officio	VIVODI	328/101	Non- imposition of penalties
Investigation of Telecommunications and Competition legislation infringement by OTE regarding the 2003 Interconnection services tariffs provided to the complainant	ALGONET	OTE	332/127	Non- imposition of penalties

Subject	Petitioner	Defendant	Decision No	Pronouncement
Investigation of General Authorization conditions, Law 2867/2000 provisions and General Authorizations Regulation infringement	EETT	COMPULINK NETWORK S.A.	318/38	Revocation of Authorization
Investigation of Individual Licence conditions, Law 2867/2000 provisions and Individual Licence Regulation infringement	EETT	- VODAFONE - IDEAL TELECOM	327/86	Revocation of Authorization
Investigation of Individual Licence conditions, Law 2867/2000 provisions and Individual Licence Regulation infringement	ЕЕПТ	GRAPES HELLAS S.A.	318/37	Revocation of Authorization
Investigation of Individual License conditions, Law 2867/2000 provisions and Individual Licence Regulation infringement	ЕЕТТ	STARCOM HELLAS – INTERNATIONAL TELECOMMUNICATIONS S.A.	312/55	Revocation of Authorization
Interim Measures Adoption Request: Investigation of telecommunications and competition legislation infringement regarding the Interconnection market	FORTHNET	ОТЕ	304/69	Rejection
Interim Measures Adoption Request: Investigation of the compatibility with the telecommunications and Competition legislation review of the new VODAFONE and COSMOTE business packages.	ALGONET	- COSMOTE - VODAFONE	305/55	Rejection
Interim Measures Adoption Request: Investigation of the compatibility with the telecommunications and Competition legislation review of the new VODAFONE business packages.	- TELEPASSPORT - FORTHNET	VODAFONE	305/54	Rejection
Interim Measures Adoption Request: Investigation of the compatibility with the telecommunications and Competition legislation review of the new VODAFONE, TIM HELLAS and COSMOTE business packages.	- TELEDOME - NET ONE	- COSMOTE - VODAFONE - TIM	305/53	Rejection

Subject	Petitioner	Defendant	Decision No	Pronouncement
Interim Measures Adoption Request: Regarding the subscribers data exploitation and illegal use by OTE in a win back campaign context, data collected by OTE due to applications submission for the Carrier Pre Selection (CPS) service activation.	TELLAS S.A.	OTE	327/87	Rejection
Interim Measures Adoption Request: Investigation of the telecommunications and Data Protection legislation infringement regarding the TELLAS S.A behaviour, activating the Carrier Pre Selection service without the express consent of subscribers	OTE	TELLAS S.A.	332/137	Rejection
Interim Measures Adoption Request: Investigation of the telecommunications and Competition legislation infringement regarding the OTE behaviour to threaten interruption of services due to the non- conclusion on an agreement on the Letters of Guarantee tune	ACN – COMMUNICATIONS NETWORK ALTEC S.A.	OTE	339/41	Rejection
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name uip.gr	UNITED INTERNATIONAL PICTURES LTD	HARALAMBOS TOULKARIDIS	325/258	Archived
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name xrimatisthrio.gr	VIDIPLUS S.A.	MOTOR PRESS HELLAS S.A.	325/259	Archived
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name total.gr	TOTAL LUBRIFIANTS S.A. TOTAL FINAELF S.A.	P. PAPANTONIS S.A.	325/262	Archived
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name monster.gr	TMP WORLDWIDE INC	MAVROUDEAS S.A.	331/93	Archived
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name xrimatistirio.gr	MOTOR PRESS HELLAS S.A.	K. ZIKOS	331/94	Archived

Subject	Petitioner	Defendant	Decision No	Pronouncement
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name design.gr	K. GRITZALIS	DIMITRIS FAKINOS	331/95	Archived
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name erotikos-fm.gr	EROTIKOS RADIO	CH. ATHANASIADIS	331/96	Archived
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name interwetten.gr	INTERWETTEN A.G.	FOTIS ANTONOPOULOS	335/78	Archived
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name glamour.gr	ADVANCE MAGAZINE PUBLISHERS INC.	CHARALAMBOS KYRETZIS AND CO.	336/68	Archived
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name macworld.gr	INTERNATIONAL DATA GROUP INC.	G. DAVELIS	337/100	Archived
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name elytis.gr	SOFIA - IOULITA ILIOPOULOU	IOANNA KARLAFTI	329/95	Archived
Interim Measures Adoption Request: Investigation of the telecommunications and Competition legislation infringement regarding the OTE behaviour to threaten interruption of services due to the non- conclusion on an agreement on the Letters of Guarantee tune	ALGONET TELEDOME	ОТЕ	338/98	Rejection
Interim Measures Adoption Request: Investigation of INFO QUEST's complaint regarding the low tariff SMS offers to mobile pre-paid subscribers	INFO QUEST S.A.	- TIM HELLAS - VODAFONE - COSMOTE	332/136	Rejection
Interim Measures Adoption Request: Investigation of the prohibition of the stated by OTE increase of retail tariffs for calls to shared charge numbers assigned to the complainant	ALGONET	ОТЕ	325/261	Rejection

Subject	Petitioner	Defendant	Decision No	Pronouncement
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name TIM HELLAS.gr	TELECOM ITALIA S.P.A. STET HELLAS S.A.	IOANNIS TRIANTAFILLOU	308/48	Deletion/ Rejection
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name proastiakos.gr	ATTICA SUBURBAN RAILWAY	ALEXANDROS DESPOTOPOULOS	324/64	Deletion/ Rejection
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name dragster.gr	KONSTANTINOS PAPATRIANTAFY LLOU	ILIAS VATHIAS	328/91	Deletion/ Rejection
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name motokinisi.gr	MOTOKINISI LTD.	PANAYIOTIS TSITOS	328/92	Deletion/ Rejection
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name www.bridgestone.gr	BRIDGESTONE CORPORATION	TH. PANOUSAKIS S.A.	334/56	Deletion/ Rejection
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name www.google.gr	GOOGLE TECHNOLOGY INC.	THEOFILOS SAGIROGLOU LTD.	334/57	Deletion/ Rejection
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name www.elf.gr	TOTALFINAELF LUBRIFIANTS S.A TOTALFINAELF S.A.	CHRISKA LTD.	334/58	Deletion/ Rejection
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name www.fina.gr	TOTALFINAELF LUBRIFIANTS S.A TOTALFINAELF S.A.	- KAVAKLIOTIS- ANKA OIL - CHR.KAVAKLIOTOU - CHRISKA LTD.	334/58	Deletion/ Rejection
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name www.feta.gr	CHEESNET	A. PAIDIS	336/69	Deletion/ Rejection

Subject	Petitioner	Defendant	Decision No	Pronouncement
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name www.hellasjet.gr	HELLAS JET S.A.	ONTARIO S.A.	337/99	Deletion/ Rejection
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name www.latin.gr	GER.VASILATOS	IOAN. LEGAKIS	337/95	Deletion/ Rejection
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name www.bellacasa.gr	L. KOUTOULOGENI AND CO.	T. STAVRIAS	338/97	Deletion/ Rejection
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name alkistisprotopsalti.gr	A. PROTOPSALTI	UNIVERSAL MUSIC S.A.	337/93	Deletion/ Rejection
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name www.dap-iatrikhs.gr	DAP-NDFK	SARANTOS KAPTANIS	305/52	Deletion/ Rejection
Interim Measures Adoption Request: Investigation of the telecommunications and Competition legislation infringement regarding the OTE 2003 Interconnection services tariffing to the complainant and threatening to interrupt access services in case of non payment of the purported as legal billed amounts	ALGONET	OTE	325/26	Interim Measures Adoption
Interim Measures Adoption Request: Investigation of the compatibility with the telecommunications and Competition legislation review of the new TIM HELLAS B BEST BENEFIT business package	- VIVODI - SATPE	TIM HELLAS	332/135	Interim Measures Adoption
Investigation of Management and assignment of Domain Names holding the [.gr] suffix Regulation infringement for the Name www.expotech.gr	EXPOTECH LTD	NETWORK S.A.	337/98	Maintenance

Finally, the aforementioned Hearings had the following results.

	Summary Table of Fines		
Provider	Subject	Fine	Decision Number
		(euro)	
OTE	Specification of Universal Service content -Disabled		
	Users Provisions	15,000.00	308/44
	Telecommunications and Competition legislation		
	infringement regarding Special Interconnection Services		
	(Access-Interconnection of telecommunications providers		
	to the OTE network for free, shared and premium rate services)	60,000.00	308/45
	Telecommunications and Competition legislation		
	infringement regarding the installation of public phones		
	by third undertakings	15,000.00	325/269
	Telecommunications legislation infringement regarding		
	the NNP Short Codes Management Regulation	15,000.00	329/97
	OTE non-compliance with the obligations imposed by means		
	of EETT's Decision 261/142/28-08-2002 on "the Approval		
	of the 2002 OTE Reference Interconnection Offer",		
	as regards the provision of Interconnection	150,000.00	337/91
	Non-submission of data in accordance with the stipulations		
	of EETT's Decisions 277/64 (GG Issue 514/B/02-05/2003) and		
	301/30 (GG Issue 1925/B/2003)	500,000.00	339/40
INFO QUEST	Comprehensive Directory issue and release and		
S.A.	Comprehensive Directory Enquiries Service operation		
	according to the USP obligations	20,000.00	318/43
COSMOTE	Comprehensive Directory issue and release and		
	Comprehensive Directory Enquiries Service operation		
	according to the USP obligations	20,000.00	318/41
TIM	Comprehensive Directory issue and release and		
HELLAS	Comprehensive Directory Enquiries Service operation		
	according to the USP obligations	20,000.00	318/42
VODAFONE	Comprehensive Directory issue and release		
	and Comprehensive Directory Enquiries Service operation		
	according to the USP obligations	20,000.00	318/40
ALGONET	Telecommunications legislation infringement, especially		
	regarding the provisions of the National Numbering Plan (NNP)	15,000.00	329/96

	Summary Table of Recommendations	
Provider	Subject	Decision Number
OTE	Investigation regarding the imposed fees cost-	314/29
	orientation for the non-entry in the directory service	
	Comprehensive Directory issue and release and Comprehensive Directory	318/39
	Enquiries Service operation according to the USP obligations	
	Costing of a Basic Rate Access (BRA) ISDN connection	338/94
FORTHNET	Comprehensive Directory issue and release and Comprehensive	328/102
	Directory Enquiries Service operation according to the USP obligations	
TELEPASSPORT	Change of share composition without EETT's approval in violation of Law 2867/2000 and the Individual Licences Regulation	304/70
ALPHA DIGITAL	Investigation of Individual Licence conditions violation	328/94
SYNTHESIS S.A.		

It should be noted that Decisions on Hearings held by EETT are subject to judicial control in accordance with the law in force.

#### 4.9. Goals

EETT has set the following goals for 2005 regarding the telecommunications sector:

- ➤ To develop the markets of electronic communications networks and services as well as to increase the penetration of broadband services. Towards this direction, emphasis will be given on the adaptation of the existing regulatory framework to the requirements of the new national legislation that will be adopted in 2005 following harmonization with the new European legislative framework. In addition, the monitoring role of EETT for the timely identification and management of arising issues is of significant importance.
- ➤ To safeguard the access for all consumers to a great range of communication networks and services. In this context, an ongoing concern is the provision of all services, including the US, according to the specifications that have been in force and the completion of the National Contingency Plan.
- To continue the provision of adequate information to consumers as well as to further improve the management procedure for processing requests/ complaints and the undertaking of measures to resolve issues to the immediate interest of consumers.



### **RADIO FREQUENCY SECTOR**



#### 5. Radio Frequency Sector

The following Sections present EETT's actions in relation to radio spectrum management and monitoring, as well as Radio Equipment and Telecommunications Terminal Equipment (RTTE) in 2004, summarized in six main directions:

- Radio frequency assignments and Antenna Mast Construction licensing.
- Optimization of spectrum management mechanisms.
- Establishment of an effective spectrum control and monitoring system, mainly through the integration of the National Spectrum Management and Monitoring System (NSMMS).
- ➤ Immediate handling of interference and management of complaints.
- Preventive control of spectrum use emphasizing on the radio-television one.
- > Ensuring compliance with RTTE.

#### 5.1. Radio Spectrum Management

#### 5.1.1. Radio Frequency Assignment

#### **Fixed Service**

The fixed service includes radiocommunications networks at specified fixed points used either for the provision of public telecommunications services or in order to meet private telecommunications needs.

The first category relates to Terrestrial Microwave "Point-to-Point" Link Networks, which consist of fixed stations communicating with high frequency wireless links. These Networks enable telecommunications providers to develop their networks in a short period of time and at a relatively low cost.

The second category relates to meeting own operational needs and is irrelevant to the provision of telecommunications services to third parties. Examples of private use are:

- Telemetry and telecommand applications for the coverage of monitoring and remote systems control needs, e.g. the telemetry system operating along Attiki Odos for the control of road lighting electrical installations.
- Radio or television stations for the transmission of their program's image and/ or sound from production point to the transmittion network.
- Radio location applications for the definition of position, speed or other characteristics of ships, airplanes, etc.
- Development of data transmission networks for public services, which meet public interest needs, such as microwave links of the Public Power Corporation (PPC) for its network monitoring.

In the context of the National Spectrum Management and Monitoring System (NSMMS) operation, in 2004 new radio frequency assignment systems came into operation, contributing to the improvement of the relevant procedures and the effective management of the available radio spectrum (see subsection 5.1.3.).

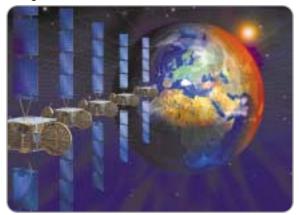
In 2004, 1,850 radio frequencies were assigned in total for "Point-to-Point" links, concerning telecommunications services providers' networks. Also, 55 radio frequencies were assigned to private radio stations.

#### **Fixed Satellite Services**

Provision of satellite services requires the installation and operation of terrestrial stations (image 4) linked to geostationary satellites (image 5) for radio-television broadcasting and data transmission, nationally and internationally, on a permanent or occasional basis.



**Image 4: Terrestrial Satellite Stations** 



**Image 5: Geostationary Satellites** 

The operation of Very Small Aperture Terminals (VSAT) for voice and data transmission is also a widespread satellite service (Image 6).



Image 6: VSAT Terminals

The installation and operation of terrestrial satellite stations requires national and international coordination

with existing national and international wireless networks, satellite and terrestrial. In this context, during 2004, EETT implemented the provided by the International Telecommunication Union (ITU) procedures for the harmonization of each satellite station's operation with the existing wireless networks.

In total, in 2004, 20 satellite channels were assigned to terrestrial satellite infrastructure stations and 5 to dependent VSAT network topology stations, accounting to the total number of applications submitted. They mainly concerned telecommunications services providers' networks, including OTE satellite stations.

Finally, in accordance with the International Radio Regulations, EETT, in collaboration with the Ministry of Transportation and Communications (MTC), drafted a list of the terrestrial satellite stations licensed in 2004 with all their technical specifications, in order to achieve international coordination and mutual interferences to be avoided.

#### Private Mobile Radio Networks - Mobile Service

The term "Private Mobile Radio (PMR) Networks" is used to describe private radio networks of land mobile service used to meet communication needs of various professional users, as well as emergency services. Examples of such networks are the communications networks used by radio-taxis and transportation companies, as well as emergency networks such as those used by the Fire Brigade (FB) and the National First Aid Center (NFAC). Typically, these consist of mobile radio transceivers that communicate with a central station, called the base station. These networks are intended exclusively for private use and not for provision of public telecommunications services. This is why their commercial exploitation is prohibited, as well as their connection to the public telecommunications network. These are divided into two large categories: local coverage networks, which cover a small area

within a range of few kilometers and the regional coverage networks, which cover a wider area that may extend to two or more prefectures.

EETT is responsible for the assignment of PMR operating frequency. Operating licences for PMR Networks are issued by the Prefectural Authority, following a concurring opinion by EETT. In this context, EETT examines the technical information of the file submitted to the Prefectural Authority, and provided that the required specifications are met, it assigns the suitable radio frequency, specifying the PMR technical characteristics.

During 2004, all applications concerning local and regional coverage networks were processed (Table 19). In total, 163 applications were submitted, out of which 120 were satisfied by the assignment of the respective radio frequency and 10 were rejected. Finally, 33 cases with insufficient data were returned to the respective Prefectural Authorities for new submission.

Table 19				
			ssignment o Networks	<b>i</b>
	Total	Approval	Rejection	Return of dossiers
Applications	163	120	10	33

Moreover, 26 applications for temporary radio frequency assignment for emergencies were processed, related to the use of PMR of foreign delegations visiting Greece.

#### **Support Services for Image and Sound Transmission**

Support services for image and sound transmission constitute an important category of services. Examples of such services are the coverage of a sports event, an open show or an emergency.

For the coverage of such events, equipment, such as wireless cameras, wireless microphones and portable microwave links, is required. Image and sound (i.e. towards studios) are transmitted through an outside broadcasting vehicle (Electronic News Gathering-ENG/ Outside Broadcasting-OB) for short distances (Image 7) or Satellite News Gathering (SNG) vehicle for longer distances (Image 8).



Image 7: Outside Broadcasting Vehicle - ENG/ OB



Image 8: Satellite News Gathering Vehicle- SNG

EETT, in an effort to provide the quickest service to these users, has published in its website¹ application forms (in Greek and in English) for temporary radio frequency assignment concerning scheduled or non scheduled events.

¹http://www.eett.gr/gr\_pages/telec/wireless/sap\_sab.doc.

In 2004, following relevant applications submission, radio frequencies were assigned to 15 satellite news gathering stations (SNG and Fly Away²). The aforementioned applications mostly concerned the portable image and sound transmission satellite stations from international users for the coverage of events such VIP visits and various athletic events (European football championship and Test Events of the 2004 Olympic Games). Also, 4 frequencies were assigned to wireless and Talk Back communication systems, in collaboration with the MTC.

#### **Spectrum Fees**

Radio spectrum users pay special fees for its use. Fees imposition acts as a motive for the most effective spectrum exploitation by users and enables the operation of the necessary mechanism that ensures proper and optimum spectrum use, by EETT. The fees collected by EETT in 2004 are presented in Table 20.

#### 5.1.2. Licensing for Antenna Mast Constructions

The installation of Antenna Mast Constructions enables fast development of wireless telecommunications networks serving signal transmission to areas where the installation of wire infrastructure may be time-consuming, expensive and/ or impossible. EETT is competent for granting the relevant licences. The prior consent of Civil Avriation Authority (CAA), which inspects the construction in terms of

aviation safety, is required, together with the favorable opinion of the Hellenic Atomic Energy Commission (HAEC) as regards radiation limits of the antennas set in the construction.

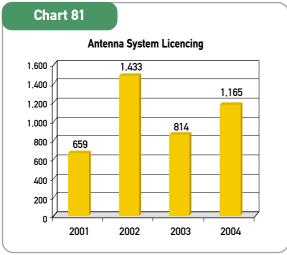
The licensing procedure in 2004 was based for the first time on the integrated spectrum management software system, included in NSMMS (see subsection 5.1.3.). This particular system enabled EETT to reduce response time to licensing requests from telecommunications providers, contributing to the fast development and growth of their networks. Moreover, the licence form was enriched with a detailed appendix including the most important technical elements characterizing each construction, such as power and transmission frequency, antenna direction, etc. The aim was to provide better information to citizens and local agencies that frequently submit requests in relation to the purpose of antenna installations in their areas.

Also, EETT applied a unified numbering system for Antenna Mast Constructions. More specifically, via the National Antenna Mast Construction Registry (NAMCR), each antenna construction bears a unique identifier, thus enabling the connection between antenna constructions and assigned radio frequencies, especially in cases of collocation of two or more providers at the same antenna construction.

Table 20	
Radio Spectrum Fees	
Categories of Fees	Total Fees (euro)
Annual spectrum use fees (Satellite & Fixed Service)	12,782,289.47
PMR Operational Fees (Mobile Service)	362,113.84
Radio frequency assignment fees (lump sum fees for application review)	616,568.50
Temporary licence assignment fees (Coverage of emergencies, state delegations, Embassies)	35,700.00
Radio frequency assignment fees for the Olympic Games 2004	706,200.00
Total	14 502 871 81

<sup>&</sup>lt;sup>2</sup> Fly Away: Easily transported equipment that allows rapid satellite connection in distant areas for data, sound and image transmission.

According to the provisions of the relevant Regulation<sup>3</sup> issued by EETT in 2004, small antenna constructions without masts and shelters (Microcell Antenna Systems) were licence exempted, and this fact contributed to the faster and more flexible development of mobile telephony networks.



Source: EETT

Moreover, priority was given to the licensing of base stations accommodating 3<sup>rd</sup> Generation mobile telephony system antennas, aiming at facilitating the development of the related networks. 1,165 relevant licences were granted during the year, while 465 were returned due to omissions or inconsistencies in supporting documents.

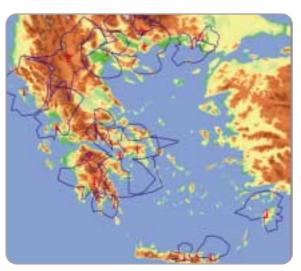
#### 5.1.3. Optimization of Spectrum Management Mechanisms

## Integration of the National Spectrum Management and Monitoring System in Licensing Procedures

The NSMMS integrated spectrum management software was delivered to EETT and started its operation in mid-January 2004. EETT's staff was trained on the new environment and integrated successfully and quickly the new software in radio frequency spectrum licensing operations.

One of the significant benefits arising from NSMMS operation is the optimization of assignment and licensing procedures, having as result the best response to the relevant market requests. Requests handling is technically more complete and the management of available radio frequencies more effective. This ensures more effective spectrum use and enhances the faster development of new wireless technologies and applications.

Specifically, the NSMMS operation contributes to the integrated management of requests for radio frequency assignments, at all stages of processing: from the preparation of the coordination study (see Image 9) with other licensed radio frequency users in the wider geographic area and the application of suitable technical criteria on the basis of the relevant recommendations of European and international organizations (ECC, ETSI, ITU), to the selection of the suitable radio frequency for assignment to a specific user and the calculation of assignment and radio frequency use fees. The system operates in a network environment of at least 30 terminals and enables simultaneous work of the staff, in order to achieve faster completion of each stage.



**Image 9: Standard Coordination Study** 

<sup>&</sup>lt;sup>3</sup> Decision EETT 302/11/2003, GG Issue 91/B/23-01-2004.

Particular importance was placed to the adaptation of the software to the applicable licensing procedures in Greece (administrative and technical), focusing on the proper implementation of assignment criteria and the integration of detailed geographic and morphology maps of Greece, so that possibilities for interference caused by other licensed users is minimized and best spectrum use is ensured.

## Implementation of Radio Frequency Assignment Criteria

The selection of suitable radio frequency assignment criteria constitutes a major factor for the optimum spectrum management. The aim is to provide wireless telecommunications services at a predetermined quality level and the coordination of as many users as possible, ensuring best exploitation of the available spectrum to meet existing and future needs.

The radio frequency assignment criteria represent a set of critical technical parameters, which are taken into consideration in the study and in the radio frequency assignment process. The identification of technical criteria is based on the relevant recommendations of European and International Organizations (ECC, ETSI, ITU) and on the practice applied by National Regulatory Authorities (NRAs) of other member states, in combination with the functionalities provided by the available tool of study (software).

The procurement of the NSMMS and its incorporation in EETT's business operation resulted in the optimization of technical assignment criteria. The new and improved features offered by the NSMMS technical tools are:

- Higher geographic data precision.
- Support of improved electromagnetic dissemination models, calculation of network availability and potential interference, in accordance with international recommendations.
- Introduction of new technical parameters reflecting technological developments in radio equipment.

The new technical criteria enable the detailed study of cases related to specific geographic areas and frequencies bands where congestion is observed due to increased demand. In this way, spectrum is efficiently used and satisfaction of user requests is achieved.

## Updating of the National Radio Frequencies Registry for HF/VHF/UHF

The National Radio Frequencies Registry (NRFR) consists the main tool for radio spectrum management, given that all radio frequencies assigned in Greece are registered.

In 2004, in view of the Olympic Games, emphasis was given on the NRFR update, giving priority to assigned frequencies in the Prefecture of Attica as well as in other Olympic cities. More specifically, EETT proceeded to the following actions:

- Performance of measurements in various bands of the radio spectrum and cross-checking of results with data provided by NRFR.
- Tracking of illegal broadcasting users.
- Performance of measurements in the assigned frequencies of Athens radio taxis and crosschecking of results with the data provided by NRFR.
- Deletion of frequencies not in use from the NRFR, emphasizing on Olympic Cities<sup>4</sup>.

<sup>&</sup>lt;sup>4</sup> Decisions EETT 306/08/2004. GG Issue 601/B/23-04-2004 and 325/233/2004. GG Issue 1345/B/31-08-2004.

## 5.2. Radio Spectrum Monitoring & Control

## 5.2.1. Immediate Management of Interferences and Investigation of Complaints

The operation of an efficient control and monitoring mechanism is a necessary prerequisite for the rational management of the radio frequencies spectrum. Under this framework, EETT proceeds to intensive inspections performed either ex officio or upon complaints, aiming at the immediate management of interference.

#### **High Priority Networks**

The uninterrupted operation of wireless networks related to the protection of human life and public safety is a top priority for EETT. Indicative examples of such networks are the networks of the CAA, the Armed Forces, the Hellenic Police, the FB, and the NFAC.

Most of the problems appear to the CAA networks due to the adjacency of the Air Navigation Band (108 - 137 MHz) with the band used for FM radio broadcasts (87.5 - 108 MHz). Due to the non-harmonized broadcasting of radio stations, the smooth operation of radio aids and CAA communications may be prohibited.

EETT permanently monitors the air navigation spectrum all over the Greek Territory, aiming at dealing with the above problems. In 2004, inspections were performed with the assistance of Fixed Monitoring Stations (FMS), which have been installed by EETT in Athens International Airport (AIA) and in the airports of Heraklion and Rhodes, and also with the assistance of the Mobile Monitoring Stations (MMS) mainly for the areas outside Attica and Thessaloniki.

Moreover, EETT units performed technical inspections at the CAA telecommunications centers, emphasizing on Mount Geraneia and Mount Akarnanika. These particular telecommunication

centers are facing many problems due to the existence of radio-television transmitters which are very close to the CAA receivers. EETT's inspections led to a number of technical proposals for short-term and long-term solutions, contributing to the reduction of the aforementioned interferences with ground stations.

In total, 270 written complaints were submitted by CAA, out of which:

- 44% concerned interferences in ground stations.
- ➤ 56% concerned interferences in airplanes during flight, out of which:
  - 42% related to interferences by radio stations
  - 58% related to increased noise levels at receivers.

The majority of complaints concerned the area of the Aegean Sea (18%), the Mount Akarnanika and Mount Geraneia broadcasting centers (12% respectively) and the remaining areas of the country (35%). Finally, 23% of the complaints did not state a specific area.

Furthermore, in the context of the Olympic and Paralympic Games, EETT intensified the inspections in the frequency bands of the remaining high priority networks (Hellenic Police, NFAC, FB, etc). Following complaints as well as scheduled measurements, inspections were held in the Prefectures of Attica, Korinth, Fthiotida and Achaia. In all cases the type of interference was identified and resolution procedures were scheduled. During 2004 complaints were submitted to EETT by services associated with the protection of human live and public safety (Hellenic Police, FB, NFAC), which were processed by priority.

#### **Television and Radio Stations**

In 2004, the cases of complaints related to interferences, illegal broadcasts and illegal installations of radio-television stations amounted to 412. Their allocation all over the Greek territory is shown in the following table:

Table 21  Geographic Allocation of Complain	ts for Radio-Television St	ations	
Geographic Allocation	Television Stations	Radio Stations	Total
Prefecture of Attica	69	73	142
Thessaly, Macedonia, Thrace (area of responsibility of the Regional Office of EETT in Thessaloniki)	41	47	88
Remaining Territory	68	114	182

EETT proceeded to the investigation of the majority of the above complaints, in collaboration with the respective Prefectural Authorities in several cases regarding complaints outside Attica. As regards all the aforementioned complaints, the conclusions of technical controls were forwarded to the National Radio-Television Council (NRTC), which is competent for the imposition of administrative penalties according to the provisions of the radio-television legislation.

#### **Mobile Telephony**

The cases of complaints and inquiries regarding mobile telephony antenna constructions as already mentioned in subsection 2.2.7., amounted to 1,006 for 2004. Following a detailed investigation, it was found that 820 cases concerned licensed antennas, for whose legality the complaining parties/ applicants were informed. As regards the 186 cases regarding non-licensed constructions, EETT intervened with the performance of 161 autopsies in total, out of which 143 were made in Attica, while the remaining 25 were referred to the competent Prefectures. The autopsies were performed in order for EETT to identify the holder of the constructions and impose the provided administrative penalties. Subsequently, upon its decision, EETT proceeded to the briefing of local competent Town Planning services for the removal of each illegal installations and the Public Prosecutor of the Court of Misdemeanors in order to impose penal sanctions (see subsection Administrative- Penal Sanctions).

Moreover, EETT received 55 complaints from Mobile Telephony Providers (MTP) for interference to the frequencies which have been assigned to them. Out of those, 21 concerned interference within the Prefecture of

Attica, while the remaining 34 were related to the remaing Greek territory. In all cases, EETT proceeded to immediate identification of the type of interference and to the necessary actions for the resolution of the problems.

#### **Fixed Service**

During 2004, EETT received 9 complaints regarding interference from/or to radio links of the fixed service, which are distributed as follows:

- 3 from the National Meteorological Service (NMS), the Athens Observatory and from coastal navigation lines at the port of Heraklion in Crete, for interference in data reception satellite systems.
- 2 for interference in image transmission systems of the Hellenic Police helicopters.
- 3 for the free band of 2400 2483.5 MHz.
- 1 from CAA for interference in air frequency by a telecommand system.

The technical units of EETT identified the type of interference and the necessary actions for their resolution were scheduled. Also, before and during the Olympic and Paralympic Games, EETT, in collaboration with major spectrum users, such as radio-television stations, proceeded to the arrangement of their radio link transmissions, for the uninterrupted operation of Olympic users systems and in order to minimize potential interference.

#### **Radio Amateurs**

Following complaints as well as requests by the owners themselves, EETT was called to confirm the correct operation of radio amateur stations. It was also called to investigate complaints about illegal

broadcasts, as well as interferences in legal radio amateurs.

In 2004, 40 cases were processed in total. In all cases, the predetermined measurements and control of machinery and station documents were performed, in order to confirm proper operation and compliance with the applicable legislation.

#### **Private Mobile Radio Networks**

In view of the Olympic Games, but also throughout 2004, intensive controls and measurements were performed in the wider area of the Prefecture of Attica and in the other Olympic Cities, in the radio frequency spectrum bands which are assigned for the use of PMR Networks.

From the above, illegal broadcasting was identified, some of which caused interference and prohibited the uninterrupted operation of legally operating PMR Networks. In all cases, the necessary actions to resolve problems and impose the provided sanctions were immediately scheduled. The total number of complaints amounted to 30.

It should be noted that in several cases, citizens requested the identification of the type and purpose of antenna systems, related to PMR Networks, installed at areas adjacent to those of the complainants, expressing concerns about their health and the problems that might be caused by their operation. EETT investigated all cases and informed the interested parties accordingly. The majority of them was related to licenced Antenna Mast Construction systems the use of which was inspected according to their licence terms. In the few cases of illegal systems, EETT took the necessary actions for their removal.

#### **Complaints for International Coordination Issues**

In parallel, EETT dealt with three cases of interference, which, according to the relevant complaints, were caused by transmitters installed on Greek ground to receivers of other countries.

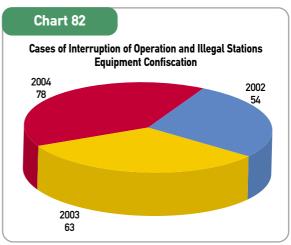
The two cases which were related to television interference to bordering countries and were resolved upon consultation with the competent bodies, highlighted the need to regulate the licensing of private radio-television stations also for reasons of international coordination.

The third complaint concerned interference in the frequency of 9MHz, to an air navigation system (communication with airplanes on flight) based in Sweden. The source of the interference was identified outside the Greek Territory following a visit of an EETT technical unit with the mobile radio direction-finding unit in the Prefecture of Joannina.

#### **Administrative - Penal Sanctions**

In the context of the aforementioned ex officio controls and complaints of agencies and citizens, EETT proceeded in 2004 to the tracing, interruption of operation and confiscation of broadcasting equipment of 78 illegal stations, out of which 55 were in Athens, 21 in Thessaloniki and 2 in the remaining Greek Territory. These concerned 75 radio-television stations, 2 fixed service radio link stations and 1 Citizen Band (CB) station.

Out of the above operations, an increase of 24% was noted in comparison to 2003 (Chart 82).



Source: EETT

As regards illegal Antenna Mast Constructions, 108 fines were imposed in total in 2004 for illegal Antenna Mast Constructions, according to Table 22.

Table 22						
Total Fines for Illegal Antenna Mast Constructions 2004						
Provider	Number of Fines	Total Fines (euro)				
соѕмоте	48	501,176				
INFO QUEST	4	52,022				
INTRACONNECT	3	34,348				
OTE	5	73,370				
TIM HELLAS	19	173,066				
VODAFONE	34	407.176				

## 5.2.2. Preventive Control of the Radio - Television Spectrum Use

The observance of specific broadcasting characteristics contributes to the prevention of interference among various services and users of the same service and also ensures rational use and proper exploitation of the radio frequency spectrum.

ITU, by means of Recommendations, suggests the harmonization among various services, imposing concrete technical specifications on broadcasting, mainly related to the transmission frequency, the distance between channels and broadcasting centers, the effective radiated power and the radiation pattern of the used Antenna Mast Construction system.

Specifically, Recommendation 1009<sup>5</sup> imposes the harmonization of radio broadcasts with air navigation frequencies and its compliance is necessary for the smooth operation of CAA communications and the safety of flights.

The current situation in Greece, regarding in general the radio-television scene, is considered to be transitional, since the organization of broadcasting centers into antenna parks and the licensing of all television and radio broadcasts is still pending. The MTC has taken up efforts for the creation of the first park in Athens. EETT actively participates in these efforts, acknowledging their importance to secure legal spectrum use and protection from illegal broadcasts.

## Recording and Control of Transmissions Technical Characteristics

In 2004, EETT continued the inspections in the Mount Hymettus broadcasting centre, which hosts part of the state-owned radio and television stations, the majority of the licensed private radio stations and part of the private television stations. Similar inspections were performed in Parnitha, Mount Poikilo and Aegina broadcasting centers.

Moreover, in addition to the on-the-spot technical inspections, systematic recordings of the radio spectrum and broadcasting characteristics were performed on a daily basis in order to certify compliance with the specifications laid down, as these are outlined in the FM Radio Frequency Map of the Prefecture of Attica. The main technical elements investigated were the frequency (tracing a transmission in non-assigned frequency), maximum standard deviation (control of overmodulation) and maximum effective radiated power.

During 2004, EETT was reporting to the NRTC, on a monthly basis, the standard frequency deviation of all state and private radio stations broadcasting in Attica.

The investigation of maximum effective radiated power of the aforementioned radio stations was performed with the assistance of all FMS and Mobile

<sup>&</sup>lt;sup>5</sup> ITU – R Recommendations, 1994 - IS.1009.

Monitoring Stations. Measurements were conducted at 10 different points in Attica, in order to form the active radiation pattern of the radio stations and to identify the maximum radiated power and direction. A relevant report with the results of the above measurements was forwarded to the MTC.

## Imprinting of Antenna Mast Constructions at Broadcasting Centers

The imprint of the broadcasting centers all over the Greek Territory and of their broadcasts is necessary for the elimination of illegal broadcasting. Since 2002, EETT, in collaboration with the local prosecution authorities (Police, Public Prosecutor), had proceeded to the imprint of installations in Athens and Thessaloniki, updating it at regular intervals. Also, it has performed autopsies in various Prefectures of the country for the processing of submitted complaints.

In 2004, EETT's technical units performed recordings in the Prefectures of Thessaloniki, Heraklion, Ioannina, Cyclades (Syros - Paros), Messinia, Arkadia, Chalkidiki, Imathia, Magnisia and Larissa. Furthermore, units equipped with the Mobile Monitoring Stations of the NSMMS visited the Prefectures of Fthiotida, Achaia, Etoloakarnania, Argolida, Messinia, Korinth, Kilkis, Serres, Kavala, Pella and Imathia in order to deal with complaints.

Table 23 presents the results of the recording of operating private radio stations, compared to the number of frequencies assigned as provided by the applicable laws.

From the above recordings, it arises that the delays in licensing of radio-television stations all over the Greek Territory and the subsequent failure to implement the applicable Frequency Map have led to the creation of a chaotic situation as regards radio-television broadcasts. As a result, in many cases, interferences with air navigation frequencies were observed.

Table 23						
Operating Radio Stations - Frequency Map						
	Number of Frequencies					
Prefecture	Recordin	g Results	Frequency I	Map Forecast		
	Private	State	Private	State		
Messinia	39	6	18	9		
loannina (city)	48	4	6	17		
Heraklion	59	7	9	9		
Cyclades	42	2	6	8		
Arkadia	26	5	7	10		
Achaia	58	4	7	6		
Viotia	9	0	10	0		
Arta	11	0	4	3		
Imathia	112 (reception from adja	cent Prefectures as well)	7	4		
Chalkidiki	32	1		_		
Magnisia	47	6	10	5		
Larissa	52	1	7	4		

In order to deal with this situation, global management and systematic resolution methods for problems arising are required from all bodies involved (EETT, Forest Authority, Ministry of Environment, Physical Planning and Public Works- MEPPPW, PPC). To this end, EETT forwarded the results of the recordings coupled with the necessary remarks to the competent bodies. Moreover, for 2005 EETT plans to complete the recording and the systematic coverage of all radiotelevision signal broadcasting centers all over the Greek Territory with on-the-spot autopsies performed by its technical units.

#### 5.2.3. Optimization of Radio Frequency Spectrum Monitoring and Control Mechanisms

## NSMMS Integration in the Spectrum Monitoring and Control Operations

In 2004, the largest part of procurement and installation of spectrum monitoring equipment was completed in the framework of Phase A of the NSMMS, which fully meets the monitoring needs of Attica and Thessaloniki (Figure 2).

Specifically, Phase A included the procurement and installation of 5 FMS (3 in Attica and 2 in Thessaloniki) and 7 Mobile Monitoring Stations (5 in Attica and 2 in Thessaloniki). The Mobile Monitoring Stations are also used to meet monitoring needs in the rest of Greece. Moreover, 7 Transportable Monitoring Stations and 16 Portable Monitoring Sets were included to meet the monitoring needs at locations where access is not feasible through the Mobile Monitoring Stations. The installation of the aforementioned sub-systems has been completed and they are already operational, with the exception of one of the Attica FMS.

For the more complete exploitation of the NSMMS, the following were developed:

- ➤ The National Control Center (NCC) in EETT's headquarters in Athens, which hosts the Spectrum Management System and coordinates the operation of Regional Control Centers (RCC).
- Two RCC, one in Athens and one in Thessaloniki, monitoring the spectrum on a daily basis.

The installation, integration and operation of the NSMMS in the daily procedures of the Spectrum

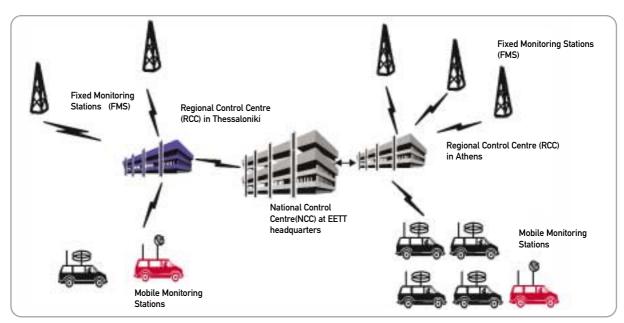


Figure 2: NSMMS Representation

Monitoring and Control Department has upgraded the spectrum monitoring capabilities of EETT and resulted to the following:

- Improved response time and complaint management.
- Accuracy in tracing.
- Monitoring and control of significantly wider frequency bandwidth.
- Measurement of various broadcasting technical characteristics.
- Possibility of immediate comparison of measured characteristics in terms of Registry entries.
- 24-hour monitoring of transmissions.
- Central monitoring and problem and crisis management.

The response and processing time of complaints has been significantly reduced. EETT's staff, with the aid of the FMS, is able to perform measurements and controls as well as to activate the problem investigation procedure, from the local control centers.

The introduction of even more modern wireless services in high frequency bands renders necessary the ability to effectively manage and monitor spectrum in those bands. Mobile Monitoring Stations V/UHF enable measurements up to 26 GHz while Mobile Monitoring Stations SHF up to 40 GHz.

The new technologies offered through the NSMMS software combined with the stations equipment ensure accurate measurements of transmissions' technical characteristics, according to the ITU recommendations. In this framework, measurements have now been incorporated and performed by the operations of the Spectrum Monitoring and Control Department as regards spectrum occupation, standard deviation, radiated power, as well as other technical

characteristics, resulting in proper monitoring and therefore management of the scarce source of spectrum.

At the same time, the software system enables 24-hour monitoring and performance of measurements for the above characteristics, without requiring continuous presence of technical staff (see Image 10). The measurements results are consequently available for processing and extracting of conclusions for the proper frequencies management.

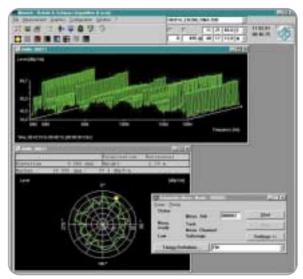


Image 10: Automatic Monitoring of Radio Frequency Spectrum

The ability of FMS and Mobile Monitoring Stations remote management combined with all the above, enables the management of serious situations and crises by the NCC. It should be noted that Mobile Monitoring Stations, even in cases located outside Attica or Thessaloniki where FMS are installed can transmit measurement data in real time.

Even though 2004 was the first year in which the NSMMS was used, the spectrum monitoring by EETT was significantly improved, as shown in Table 24.

Table 24	strum Monitoring Data before and after	the NSMMS
Spectrum Monitoring Actions	2003	2004
Recording of radio-television broadcasts	In 6 Prefectures	Full broadcasts recording in 12 Prefectures Partial broadcasts recording in 9 Prefectures
Complaints for radio-television broadcasts outside Attica	94 The majority was sent for inspection to local Prefectures	268 Significant part was dealt by EETT with the dispatch of technical units
Complaints for radio-television broadcasts in Attica	72	142
Power measurement of radio stations in Attica	Measurements from the 2 fixed stations in Maroussi and AIA	Measurements at 10 points in Athens with the use of FMS and Mobile Monitoring Stations
Autopsies of mobile telephony antennas	58 in Attica 8 outside Attica 13 were sent to Universities, Prefectures	143 in Attica 18 outside Attica 25 were sent to Prefectures
Inspections of radio amateurs Ispections of Private Mobile Radio Networks	17 15	40 30
Confiscations Average response/ management time of complaints concerning interferences in Attica	63 95% in 15 days	78 95% in 5 working days
Tracing procedure	With the use of mobile station only  – time consuming procedure	Immediate tracing of transmission area with the use of FMS allowing direction-finding and then tracing the exact position with Mobile Monitoring Stations.  Significant reduction of tracing time
Control of high frequencies (over 3 GHz)	Only with portable equipment (spectrum analyzer)	With the use of Mobile Monitoring Stations

The advanced capacity and technical infrastructures of the NSMMS were successfully exploited before (preparation stage), but also during the Olympic and Paralympic Games and contributed significantly to the protection of all spectrum users and to the fast resolution of all interference cases which occurred.

The NSMMS and its features were presented for the first time in February 2004 at a special event held in Zappeion. Specifically, part of the Mobile Monitoring

Stations functions was presented with on-the-spot measurements of wireless transmission characteristics and radio direction-finding measurements, as well as measurements of the Transportable Monitoring Stations developed in the area of Zappeion.

#### **Resource Management System**

The integration of the technologically advanced NSMMS equipment into the operations of spectrum

monitoring. in combination with the increase of human resources, rendered necessary the implementation of an effective Resource Management System. In this context, the existing system was re-designed, enabling the recording and evaluation of complaints as well as the management of available resources.

At the same time, in 2004 the recording of the needs for the procurement of an advanced, full Resource Management System was initiated. The system will enable evaluation and monitoring of the units transport cost, ensuring the best management of human resources and equipment.

# 5.3. Ensuring Compliance of Radio Equipment and Telecommunications Terminal Equipment

#### 5.3.1. Regulatory Actions

In 2004, EETT, in the framework of its competencies to ensure compliance for the placing on the market, free movement and use of RTTE, focused on the following actions:

- It specified and published radio interfaces, namely the technical specifications that the radio equipment must comply with for the use of various spectrum bands.
- It published the interfaces of telecommunications providers, namely the technical specifications of their network interfaces, thus enabling the design of terminal equipment capable of connecting to the specific interfaces and using the services offered.

#### **Publication of Radio Interfaces**

In 2004, EETT prepared the interfaces for a significant number of radio equipment classes, pertaining to:

Short range devices, such as RLANs, model control, inductive applications, medical implants, alarms, etc.

- Marine equipment, such as mobile transmitters and receivers, watchkeeping receivers on ships, VHF radio equipment for general communication and relevant equipment for Digital Selective Call (DSC) class D, emergency radio beacons, etc.
- Audio frequencies broadband links, namely communications systems for the reproduction of data audio signals or high fidelity control.

These interfaces were communicated to the European Commission and consulted upon with the member states of the European Union (EU). Subsequently EETT, having taken the remarks into consideration, proceeded to their publication upon a relevant Decision<sup>6</sup>.

A necessary prerequisite for the use of radio equipment is the compliance with the minimum requirements specified in each interface requirement for the provided types of equipment and radio frequency bands. These interfaces are also available on the EETT's website.

## Publication of Telecommunications Providers Interface

By means of its Decision<sup>8</sup> in 2003, EETT had specified those providers that must publish interface specifications, through which telecommunications services are provided to the public, the types of interfaces and all details about the information to be published. According to the above Decision, those providers are:

- Public telecommunications network providers to which terminal equipment can be connected via a network terminal point or a radio interface.
- Public telecommunications network providers having access to the final subscriber via other provider networks.
- Providers of public telecommunications services, offered via other provider networks.

<sup>&</sup>lt;sup>6</sup> Decision EETT 331/70/2004, GG Issue1911/B/24-12-2004.

<sup>&</sup>lt;sup>7</sup> http://www.eett.gr/gr\_pages/telec/RadioEquip/InterfRadioReg/InterfRadioReg.htm.

<sup>&</sup>lt;sup>e</sup> Decision EETT 294/55/2003, GG Issue 1590/B/30-10-2003.

We indicatively mention the interfaces of PSTN, ISDN, public mobile telephony networks, Unbundled Access to the Local Loop (LLU), services provided through Leased Lines with the use of one or more devices connected to the public telecommunications network, data transfer. Telex service, etc.

The publication of interface technical specifications must include adequate and detailed information in order to:

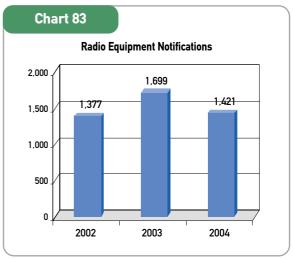
- Enable the design of telecommunications terminal equipment which can use all services provided through the interface.
- ➤ Enable manufacturers to perform the tests provided for the telecommunications terminal equipment.
- Ensure effective interoperability of the terminal equipment with the network, as well as proper operation of the equipment.

The Public telecommunication network providers under that obligation communicated the technical interfaces of their networks to EETT either in electronic form or via their websites. These interfaces are also available on the website<sup>10</sup> of EETT.

## 5.3.2. Management of Radio Equipment Notifications

In the case of radio equipment using non-harmonized frequency bands all over the EU, the radio equipment manufacturer, or the authorized representative thereof based in the EU, or the competent person for the placing of the equipment on the market must notify to EETT the technical characteristics of the equipment and its intention to place it on the market<sup>11</sup>.

In 2004, EETT received all radio equipment notifications submitted by the above individuals under the obligation. (Chart 83).



Source: EETT

The reduction observed was to a great extent due to the harmonization of frequency bands all over the EU for a significant radio equipment category, that of Short Range Devices (SRDs), which occupy a large part of the relevant market. This category includes data transmission devices, alarms, remote controls, remote control games, Bluetooth devices, local wireless network equipment, etc.

EETT closely observes developments in issues of harmonization at European level, participating in the Telecommunication Conformity Assessment & Market Surveillance Committee (TCAM).

All notifications submitted to EETT for the period 2001-2004 have been integrated in an electronic database, created under the NSMMS. The above system contributed to the faster processing of notifications submitted. Moreover, EETT intends to develop a supportive application for on-line submission and management of notifications. The goal is to reduce processing time for all relevant requests and simplify the submission procedure by interested parties.

<sup>&</sup>lt;sup>9</sup> Interfaces X25, X21, HSCSD, TCP/IP, IEEE802.x etc.

<sup>&</sup>lt;sup>10</sup> http://www.eett.gr/gr\_pages/telec/RadioEquip/prodiagrafes\_diepafon.htm.

<sup>&</sup>quot; PD 44/2002 and Decision EETT 296/49/2003, GG Issue 1881/B/17-12-2003.

#### 5.3.3. Market Surveillance

RTTE market surveillance aims at ensuring that the equipment placed on the market complies with the requirements of the existing regulatory framework. In this context, EETT is responsible for the performance of RTTE administrative and technical controls, actively contributing to the protection of consumers, the promotion of fair competition and the avoidance of harmful interferences.

In 2004, EETT investigated all complaints submitted in relation to illegal equipment and proceeded to the necessary controls with the use of the Radio Test System supplied in the framework of NSMMS. This system enables the performance of measurements on the basis of European ETSI<sup>12</sup> standards in basic parameters of the radio frequency spectrum.

Moreover, during the year, EETT observed the extent of compliance of the equipment declared in the frequency assignment applications, mostly related to radio and television stations equipment.

After the successful European market surveillance campaign concerning RTTE compliance with the administrative requirements of Directive 1999/5/EC, a new campaign is prepared at European level for the technical compliance of equipment. EETT, by participating in the Administrative Cooperation Group (ADCO) of the European Commission, is informed and closely follows all latest developments.

## 5.4. Pilot Study Implementation for the Organization of the Spectrum Directorate

In 2004, the pilot implementation of the study for the Organization of Spectrum Directorate started, according to which specialized Working Groups were set up in each Department. More specifically, these Groups are:

- Spectrum Management Department: Working Groups for licensing of Antenna Mast Constructions and the radio frequency assignment for fixed, mobile and satellite service.
- Spectrum Monitoring and Control Department: Working Groups for the investigation of Antenna Mast Constructions complaints and the maintenance of the NSMMS equipment.
- ➤ Telecommunications Equipment Department: Working Group for the RTTE market surveillance.

The largest part of supervisory positions in the Spectrum Directorate was covered in early 2004. In parallel, 2004 was the first year of operation of the EETT Regional Office in Thessaloniki, during which significant issues were dealt with. The Office was supplied with the necessary equipment in order to meet monitoring needs and was operationally incorporated in the main core of the Spectrum Diractorate.

Also, in 2004 EETT issued two Decisions on internal operation issues. According to those Decisions, the standby system was specified in order to ensure availability of supervisory staff to deal with interferences against human life outside working hours. Furthermore provisions were made for the 24-hour operation of the Spectrum Directorate for a period of 3 months, aiming at meeting the particular requirements of the Olympic Games.

Moreover, considering that the EETT staff did not suffice in number to meet the needs of the Olympic Games, EETT employed for that period, following a tender, seasonal staff, mainly skilled as technicians and drivers.

Finally, during 2004, staff training was continued in the NSMMS and significant experience was acquired from the exploitation and incorporation of various parts of that system in EETT's daily operations.

<sup>12</sup> www.etsi.org.

#### 5.5. Controlling – Monitoring Actions of EETT

In the context of its controlling and monitoring role under Law 2867/2000, EETT proceeded to the following Hearings in 2004:

Summary Table of Hearings				
Subject	Petitioner	Defendant	Decision No.	Pronouncement
Illegal installation of antenna mast construction in the position: 19 Arkadiou, Polichni Str, Thessaloniki	<ul><li>Hellenic Police</li><li>Individuals</li><li>Parliamentary</li><li>Control</li></ul>	VODAFONE	303/2	Fine: € 14,674
Illegal installation of antenna mast construction in the position:  99 Akti Ionias Str., Keratsini, Attica	- Hellenic Police - Individuals	VODAFONE	303/3	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Anixi, Prefecture of Attica	Ex officio	ANTENNA SATELLITE S.A.	304/67	Fine: € 14,674
Illegal installation of antenna mast construction in the position: OTE Building, Pallini, Attica	- Municipality of Pallini - Individual	COSMOTE	304/71	Fine: € 5,000
Illegal installation of antenna mast construction in the position: Eleftheriou Venizelou & Kodrou Str. Agia Varvara, Attica	Hellenic Police	соѕмоте	304/72	Fine: € 5,000
Illegal installation of antenna mast construction in the position: Metro Station, "Sepolia"	Ex officio	соѕмоте	304/73	Fine: € 6,000
Illegal installation of antenna mast construction in the position: 19 Parou Str, Kifissia, Attica	Individuals	соѕмоте	305/49	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Magoula, Attica, at the location "Patima", inside the area of the company ETEM S.A.	Hellenic Police	СОЅМОТЕ	305/50	Fine: € 14,674
Illegal installation of antenna mast construction in the position: 11-15 Ag. Dimitriou Str, Kessariani, Attica	- Hellenic Police - Athens Prefecture - Individuals	соѕмоте	305/51	Fine: € 14,674
Illegal installation of antenna mast construction in the position:  Metro Station, "Metaxourgeio"	Ex officio	соѕмоте	306/31	Fine: € 6,000

Subject	Petitioner	Defendant	Decision No.	Pronouncement
Illegal installation of antenna mast construction in the position: 6 Lefkados Str, Melissia, Attica	Individual	COSMOTE	307/15	Fine: € 14,674
Illegal installation of antenna mast construction in the position: I. Foka and Pandosias Str, Lambrini, Attica	Individual	VODAFONE	307/16	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Area Skaleta, Municipality of Arkadi, Prefecture of Rethymnon, Crete	Prefectural Authority of Rethymnon	COSMOTE	308/49	Fine: € 14,674
Illegal installation of antenna mast construction in the position: 2 Athonos & Samothrakis Str, Thrakomakedones, Attica	- Hellenic Police - Community of Thrakomakedones	TIM HELLAS	308/50	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Heraklion Airport	Parliamentary Control	VODAFONE	309/45	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Heraklion Airport	Parliamentary Control	TIM HELLAS	309/46	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Heraklion Airport	Parliamentary Control	COSMOTE	309/47	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Metro Station, "Panormou"	Ex officio	COSMOTE	311/51	Fine: € 6,000
Illegal installation of antenna mast construction in the position: Metro Station, "Ambelokipi"	Ex officio	COSMOTE	311/52	Fine: € 6,000
Illegal installation of antenna mast construction in the position:  Metro Station, "Megaro Moussikis"	Ex officio	COSMOTE	311/53	Fine: € 6,000
Illegal installation of antenna mast construction in the position: Metro Station, "Evangelismos"	Ex officio	COSMOTE	311/54	Fine: € 6,000
Illegal installation of antenna mast construction in the position: Metro Station, "Attiki"	Ex officio	COSMOTE	311/55	Fine: € 6,000
Illegal installation of antenna mast construction in the position: 112 Karea Ave, Vironas, Attica	Individual	COSMOTE	312/52	Fine: € 14,674

Subject	Petitioner	Defendant	Decision No.	Pronouncement
Illegal installation of antenna mast construction in the position: Lykourgou and Klearchou, Eglykada, Achaia	- Hellenic Police - Individuals	COSMOTE	312/53	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Municipal area of Methimna, Lesvos	Individual	COSMOTE	312/54	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Kalokerinou Ave, Arkadi Hotel, Heraklion, Crete	Individual	VODAFONE	313/116	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Fokionos and 37 Ermou Str, Athens	Individual	VODAFONE	313/117	Fine: € 3,000
Illegal installation of antenna mast construction in the position:  34 Alexandras Ave, Athens	<ul><li>- Municipality</li><li>of Athens</li><li>- Individuals</li></ul>	VODAFONE	313/118	Fine: € 7,000
Illegal installation of antenna mast construction in the position: Ploutarchou and Aristippou Str, Athens	Individual	VODAFONE	314/131	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Fokionos and 37 Ermou Str. Athens	Individual	COSMOTE	314/132	Fine: € 3,000
Illegal installation of antenna mast construction in the position: Giouchta, Heraklion, Crete	Prefectural Authority of Heraklion	TIM HELLAS	314/133	Fine: € 14,674
Illegal installation of antenna mast construction in the position: 16 Panormou Str, Ambelokipi, Athens	- Municipality of Athens - Individual	VODAFONE	315/77	Fine: € 3,000
Illegal installation of antenna mast construction in the position: Near the village of Ahendrias, Heraklion, Crete	Prefectural Authority of Heraklion	COSMOTE	315/78	Fine: € 14,674
Illegal installation of antenna mast construction in the position: 69 Delfon Str, Thessaloniki	- Hellenic Police	COSMOTE	315/79	Fine: € 3,000
Illegal installation of antenna mast construction in the position: 36 Tripoleos Str, Elliniko, Attica	- Hellenic Police - Individuals	TIM HELLAS	315/80	Fine: € 14,674
Illegal installation of antenna mast construction in the position: 65 Papakyriazi Str, Larissa	Municipality of Larissa	TIM HELLAS	315/81	Fine: € 14,674

Subject	Petitioner	Defendant	Decision No.	Pronouncemen
Illegal installation of antenna mast	Individual	VODAFONE	316/158	Fine:
construction in the position: Hydra				€ 14,674
Illegal installation of antenna mast	Municipality	VODAFONE	316/159	Fine:
construction in the position:	of Athens			€ 3,000
34 Agiou Thoma Str. Athens				
Illegal installation of antenna mast	Individual	VODAFONE	316/160	Fine:
construction in the position:				€ 1,000
194 Alexandras Ave, Athens				
Illegal installation of antenna mast	Individuals	COSMOTE	316/161	Fine:
construction in the position: 57 Syndika				€ 3,000
and Drosini Str, Thessaloniki				
Illegal installation of antenna mast	- Municipality	TIM HELLAS	316/162	Fine:
construction in the position:	of Athens			€ 3,000
16 Panormou Str, Ambelokipi, Athens	- Individual			
Illegal installation of antenna mast	Municipality	TIM HELLAS	316/163	Fine:
construction in the position:	of Athens			€ 3,000
34 Agiou Thoma Str. Athens				
Illegal installation of antenna mast	- Greek	COSMOTE	317/70	Fine:
construction in the position:	Ombudsman			€ 13,000
191 Kalokerinou Ave, Heraklion, Crete	- Individual			
Illegal installation of antenna mast	Municipality	COSMOTE	317/71	Fine:
construction in the position:	of Athens			€ 3,000
34 Agiou Thoma Str, Athens				
Illegal installation of antenna mast	Individual	COSMOTE	317/72	Fine:
construction in the position: 36 Lagopati				€ 14,674
Str, Prefecture of Arkadia				
Illegal installation of antenna mast	- Greek	VODAFONE	317/73	Fine:
construction in the position: 49 Idis Str,	Ombudsman			€ 14,674
Ilioupoli, Attica	- Individual			
Illegal installation of antenna mast	- Prefectural	VODAFONE	317/74	Fine:
construction in the position:	Authority			€ 10,000
Rachi Mavromati, Zakynthos	of Zakynthos			
	- Hellenic			
	Police			
	- Individuals			
Illegal installation of antenna mast	- Prefectural	COSMOTE	318/34	Fine:
construction in the position:	Authority			€ 14,674
Rachi Mavromati, Zakynthos	of Zakynthos			
	- Hellenic			
	Police			
	- Individuals			

Subject	Petitioner	Defendant	Decision No.	Pronouncement
Illegal installation of antenna mast construction in the position: Tourlada, Kalavryta, Achaia	<ul><li>Prefectural Authority of Achaia</li><li>Individual</li></ul>	OTE	318/35	Fine: € 14,674
Illegal installation of antenna mast construction in the position: 38 Marathonos Str, Metaxourgeio	Municipality of Athens	Q-TELECOM	318/36	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Metro Station, "Katehaki"	Ex officio	COSMOTE	319/81	Fine: € 6,000
Illegal installation of antenna mast construction in the position: Metro Station, "Syntagma"	Ex officio	COSMOTE	319/82	Fine: € 6,000
Illegal installation of antenna mast construction in the position: Metro Station, "Omonia"	Ex officio	COSMOTE	319/83	Fine: € 6,000
Illegal installation of antenna mast construction in the position: Metro Station, "Ethniki Amyna"	Ex officio	COSMOTE	319/84	Fine: € 6,000
Illegal installation of antenna mast construction in the position: 274 Kifissias Ave, Halandri, Attica	- EUROPEAN RELIANCE Company - Individual	TIM HELLAS	320/86	Fine: € 5,000
Illegal installation of antenna mast construction in the position: Community of Keramoutsio, Municipality of Tylisos, Heraklion, Crete	Municipality of Tylisos	VODAFONE	320/87	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Agios Athanasios, Elatos, Kynouria, Arkadia	<ul><li>Prefectural Authority of Arkadia</li><li>Individuals</li></ul>	COSMOTE	320/88	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Hill of Agios Athanasios, Araxos, Achaia	Individual	COSMOTE	322/81	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Mikrokorfi location, near the village of Fanaitika, Arkadia	Prehistoric and Classical Antiquities Authority	COSMOTE	322/82	Fine: € 14,674
Illegal installation of antenna mast construction in the position: John Kennedy and Tenarou Str, Peristeri, Attica	Individual	соѕмоте	322/83	Fine: € 5,000

Subject	Petitioner	Defendant	Decision No.	Pronouncement
Illegal installation of antenna mast construction in the position: 30 Chryssalidos Str, Halkidona, Attica	Municipality of Nea Halkidona	INFO QUEST A.E.B.E.	325/253	Fine: € 8,000
Illegal installation of antenna mast construction in the position: Near the village of Sotirianika, Messinia	Prefectural Authority of Messinia	VODAFONE	325/254	Fine: € 14.674
Illegal installation of antenna mast construction in the position: Gennimata and Pindou Str. Vironas, Attica	Municipality of Vironas	VODAFONE	325/255	Fine: € 14,674
Illegal installation of antenna mast construction in the position:  188 Thivon Str, Athens	Municipality of Peristeri	VODAFONE	325/256	Fine: € 14,674
Illegal installation of antenna mast construction in the position: 88 Akadimias Str. Athens	- Hellenic Police - Individual	VODAFONE	325/257	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Karaoli- Dimitriou and 1 <sup>st</sup> Merarchias Str, Larissa	Municipality of Larissa	VODAFONE	326/215	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Hill of San Michalis, Syros	- Hellenic Police	VODAFONE	326/216	Fine: € 14,674
Illegal installation of antenna mast construction in the position: 23 Navarchou Notara St, Piraeus	Ex officio	INTRACONNECT	326/217	Fine: € 5,000
Illegal installation of antenna mast construction in the position: 2 Messogeion Ave, near the Athens Tower, Attica	Ex officio	INTRACONNECT	326/218	Fine: € 14,674
Illegal installation of antenna mast construction in the position: 46 Halepa St, Ano Patissia, Attica	- Municipality of Athens - Individual	VODAFONE	327/82	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Municipality of Messatida, Achaia	- Prefectural Authority of Achaia - Municipality of Messatida - Individuals	TIM HELLAS	327/83	Fine: € 14,674
Illegal installation of antenna mast construction in the position:  Metro Station, "Syngrou Fix"	Ex officio	TIM HELLAS	327/84	Fine: € 3,000
Illegal installation of antenna mast construction in the position: 28 Moulopoulou Str. Alimos, Attica	Individual	COSMOTE	327/85	Fine: € 14,674

Subject	Petitioner	Defendant	Decision No.	Pronouncement
Illegal installation of antenna mast construction in the position: Metro Station, "Ag. loannis"	Ex officio	TIM HELLAS	328/107	Fine: € 3,000
Illegal installation of antenna mast construction in the position:  Metro Station, "Dafni"	Ex officio	TIM HELLAS	328/108	Fine: € 3,000
Illegal installation of antenna mast construction in the position: Metro Station, "Akropoli"	Ex officio	TIM HELLAS	328/109	Fine: € 3,000
Illegal installation of antenna mast construction in the position: Metro Station, "Neos Kosmos"	Ex officio	TIM HELLAS	328/110	Fine: € 3,000
Illegal installation of antenna mast construction in the position: 10-12 Frygias St, Ano Ilissia, Attica	Individual	VODAFONE	330/62	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Mantzarou and Manou Loizou St, Varkiza, Attica	Individual	VODAFONE	330/63	Fine: € 14,674
Illegal installation of antenna mast construction in the position: 102-108, 3rd Septemvriou St, Municipality of Athens	Individual	COSMOTE	330/64	Fine: € 14,674
Illegal installation of antenna mast construction in the position: "Pirovolia", Mount Egaleo, Attica	Ex officio	INTRACONNECT	330/65	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Molos, Lokrida, Fthiotida	Individual	OTE	330/66	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Thrakis and Tripoleos Str, Elliniko, Attica	Municipality of Elliniko	OTE	330/67	Fine: € 14,674
Illegal installation of antenna mast construction in the position:  Drastis Perouladon, Corfu	Prefectural Authority of Corfu	COSMOTE	331/88	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Bitzikou Karousadon, Corfu	Prefectural Authority of Corfu	COSMOTE	331/89	Fine: € 14,674
Illegal installation of antenna mast construction in the position: 4 Gika Str, Petralona, Attica	- Municipality of Athens - Hellenic Police	COSMOTE	331/90	Fine: € 14,674

Subject	Petitioner	Defendant	Decision No.	Pronouncement
Illegal installation of antenna mast construction in the position: Ski Centre of Menalon, Arkadia	Prehistoric and Classical Antiquities Authority	COSMOTE	331/91	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Persena, Ilia	Community of Persena	COSMOTE	332/133	Fine: € 14,674
Illegal installation of antenna mast construction in the position: 28th October and Voltou Str, Magnisia	<ul> <li>Parliamentary</li> <li>Control</li> <li>Hellenic</li> <li>Police</li> <li>Municipality of Volos</li> <li>Individual</li> </ul>	TIM HELLAS	332/134	Fine: € 5,000
Illegal installation of antenna mast construction in the position: 15 Marathonos Str, Metaxourgeio, Attica	- Hellenic Police - Individual	VODAFONE	333/131	Fine: € 14,674
Illegal installation of antenna mast construction in the position: 18 Nikopoleos Str, Zografou, Attica	<ul><li>Hellenic</li><li>Police</li><li>Municipality</li><li>of Zografou</li><li>Individuals</li></ul>	VODAFONE	333/132	Fine: € 14,674
Illegal installation of antenna mast construction in the position: 18 Akritidou Str, Panorama, Thessaloniki	<ul><li>Ministry</li><li>of Transportation</li><li>and Communications</li><li>Municipality</li><li>of Panorama</li></ul>	VODAFONE	333/133	Fine: € 8,000
Illegal installation of antenna mast construction in the position: 20 Karaiskaki Str, Volos, Magnisia	- Parliamentary Control - Hellenic Police - Individual	VODAFONE	334/51	Fine: € 10,000
Illegal installation of antenna mast construction in the position: Agios Savvas, Glyka Nera, Attica	- Parliamentary Control - Individuals	VODAFONE	334/52	Fine: € 14,674
Illegal installation of antenna mast construction in the position: 28 Dagli Str, Kato Patissia, Attica	Municipality of Athens	VODAFONE	334/53	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Kountouriotou Str. Rethymnon	Prefectural Authority of Rethymnon	OTE	334/54	Fine: € 14,674
Illegal installation of antenna mast construction in the position: 88 Akadimias Str. Athens	Individual	INFO QUEST A.E.B.E.	334/55	Fine: € 14,674

Subject	Petitioner	Defendant	Decision No.	Pronouncement
Illegal installation of antenna mast construction in the position: Karavostasi Area, Folegandros	- Thera Courthouse - Fira Town Planning Directorate - Individuals	COSMOTE	335/75	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Platanon and Kipon Str, Kifissia, Attica	Individuals	TIM HELLAS	335/77	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Kassandrou Str, Thessaloniki	Individual	COSMOTE	336/63	Fine: € 10,000
Illegal installation of antenna mast construction in the position: 37-39 Ipokratous Str. Dionysos, Attica	Municipality of Dionysos	VODAFONE	336/64	Fine: € 5,000
Illegal installation of antenna mast construction in the position: Area of Tsapoha, Karditsa	Hellenic Police	VODAFONE	336/65	Fine: € 14,674
Illegal installation of antenna mast construction in the position: 5 Marathonos Str, Peristeri, Attica	Municipality of Peristeri	VODAFONE	336/66	Fine: € 5,000
Illegal installation of antenna mast construction at the position: Panagia Hill, Kalamos, Attica	Ex officio	TIM HELLAS	337/86	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Panagia Hill, Kalamos, Attica	Ex officio	COSMOTE	337/87	Fine: € 10,000
Illegal installation of antenna mast construction in the position: Gliati and Koumbi, Markopoulo, Attica	Town Planning Office of Markopoulo	COSMOTE	337/88	Fine: € 5,000
Illegal installation of antenna mast construction in the position: Drosato, Kalavryta, Achaia	Individual	OTE	337/89	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Argolidos and Kifissias Str, Ambelokipi, Attica	Ex officio	COSMOTE	338/91	Fine: € 13,000
Illegal installation of antenna mast construction in the position: Troon and Trias Str. Peristeri, Attica	Ex officio	COSMOTE	338/92	Fine: € 5,000
Illegal installation of antenna mast construction in the position: 97 Imittou Str. Pagrati, Attica	Ex officio	COSMOTE	338/93	Fine: € 14,674

Subject	Petitioner	Defendant	Decision No.	Pronouncement
Illegal installation of antenna mast construction in the position: 4 Amorgou Str, Egaleo, Attica	Hellenic Police	Q-TELECOM	339/42	Fine: € 14,674
Illegal installation of antenna mast construction in the position: Dervenakion and Vitsi Str, Neo Iraklio, Attica	- Hellenic Police - Municipality of Neo Iraklio - Individual	TIM HELLAS	339/43	Fine: € 10,000
Illegal installation of antenna mast construction in the position: National Sports Centre of Mikra, Thessaloniki	Municipality of Kalamaria	TIM HELLAS	339/44	Fine: € 14,674
Illegal installation of antenna mast construction in the position: National Sports Centre of Mikra. Thessaloniki	Municipality of Kalamaria	VODAFONE	339/45	Fine: € 14,674
Use of non-assigned frequencies, in violation of the applicable legislation and the terms of the Licence on the installation and operation of a private mobile radio network	Individual	RADIO TAXI MACEDONIA	335/74	Fine: € 14,674
Use of non-assigned frequencies, in violation of the applicable legislation and the terms of the Licence on the installation and operation of a private mobile radio network and Illegal installation of antenna mast construction in the position: 18 Sindika Str, Giannitson Str. Thessaloniki	Individual	ASSOCIATION OF OWNERS WIRELESS TAXIS IN THESSALONIKI, EUROTAXI	337/92	Fine: € 15,000
Illegal installation of antenna mast construction in the position: Papanastasiou Str. Thessaloniki	Individual	TIM HELLAS	337/85	Recom- mendation
Illegal installation of antenna mast construction in the position: Korai and Itis Str, Lamia	Individual	K. BOTSI- L. KALLIANTERI CO LAMIA FM 34	319/80	Recom- mendation
Use of non-assigned radio link frequencies in violation of the applicable legislation - Illegal installation of antenna mast construction in the location:117 Messogeion Ave, Ambelokipi	Individual	TELETYPOS S.A. BROADCASTING	321/43	Recom- mendation
Illegal installation of antenna mast construction in the position: 4 Premetis Str. Maroussi	Ex officio	CONSOLIDATED CONTRACTORS INTERNATIONAL COMPANY SAL	329/93	Recom- mendation

Subject	Petitioner	Defendant	Decision No.	Pronouncement
Illegal installation of antenna mast construction in the position: 17 Trias Str, Kipseli	Ex officio	INTERNET Q S.A.	329/94	Recom- mendation
Use of non-assigned radio link frequencies in violation of the applicable legislation	Individuals	CH. DIMOU (METRO FM)	335/73	Recom- mendation
Use of non-assigned radio link frequencies in violation of the applicable legislation	Hellenic Police	TELEVISION ENTERPRISES ALITHIA S.A ALITHIA TV	336/67	Recom- mendation
Illegal installation of antenna mast construction in the location of Megaloupoli, Hill of Vokos, Piraeus, in violation of the provisions of Law 2801/2000 and the private mobile radio network Licence conditions	Individual	ASSOCIATION OF DRIVERS AND OWNERS OF WIRELESS RADIO TAXIS KOSMOS	339/46	Recom- mendation
Use of non-assigned radio link frequencies in violation of the applicable legislation	Prefectural Authority of Achaia	- WESTERN GREECE TELEVISION - SUPER B	328/95	Recom- mendation
Application for Interim Measures Adoption: Use of non -assigned frequencies in violation of the applicable legislation and installation of antennas in violation of Law 2801/2000 and provision of telecommunications services without a Licence	- TIM HELLAS - VODAFONE	- NTT DOCOMO - COSMOTE	337/101	Rejection
Construction of mobile telephony antenna in Heraklion, Crete, near the village of Ahendria	Prefectural Authority of Heraklion	VODAFONE	314/130	Non-imposition of penalties
Use of non-assigned radio link frequencies in violation of the applicable legislation and harmful interference to a legal user	Ex officio	- E. TSAKNAKIS - ANTENNA GREVENA	310/22	Non-imposition of penalties
Investigation of issues in relation to equipment compliance with PD 44/2002	PARISSINOS BROS S.A.	ANKO S.A.	316/157	Compliance with PD 44/2002 on certain terms and conditions
Application for revocation of EETT Decisions 310/23 and 316/157	PARISSINOS BROS S.A.	ANKO S.A.	335/81	Rejection of Revocation Application

Finally, the aforementioned Hearings had the following results.

	Summary Table of Fines				
Carrier	Subject	Fine (euro)			
ANTENNA					
SATELLITE S.A.	Illegal installation of antenna mast constructions	14,674			
COSMOTE	Illegal installation of antenna mast constructions	501,176			
INFO QUEST	Illegal installation of antenna mast constructions	52,022			
INTRACONNECT	Illegal installation of antenna mast constructions	34,348			
OTE	Illegal installation of antenna mast constructions	73,370			
TIM HELLAS	Illegal installation of antenna mast constructions	173,066			
VODAFONE	Illegal installation of antenna mast constructions	407,176			
RADIO TAXI MACEDONIA	Use of non-assigned frequencies, in violation of the applicable legislation and the terms of the Licence on the installation and operation of a private mobile radio network	14,674			
ASSOCIATION OF OWNERS WIRELESS TAXIS IN THESSALONIKI, EUROTAXI	Use of non-assigned frequencies, in violation of the applicable legislation and the terms of the Licence on the installation and operation of a private mobile radio network and illegal installation of antenna mast constructions	15,000			

Sum	mary Table of Recommendations
Carrier	Subject
K. BOTSI- L. KALLIANTERI CO LAMIA FM 34	Violation of Law 2801/2000 on the acquisition of a Licence for the installation of an antenna mast construction system and Law 2867/2000 in relation to the prohibition of use of non-assigned frequencies (Korai and Itis, Lamia)
TELETYPOS S.A. BROADCASTING	Use of non-assigned radio link frequencies  - Installation of antennas without a Licence
CONSOLIDATED CONTRACTORS INTERNATIONAL COMPANY SAL	Installation and/ or operation of antenna mast constructions without the Licence provided by the Law 2801/2000
INTERNET Q S.A.	Installation and/ or operation of antenna mast constructions without the Licence provided by the Law 2801/2000
CH. DIMOU (METRO FM)	Use of non-assigned frequencies
TELEVISION ENTERPRISES ALITHIA S.AALITHIA TV	Use of non-assigned frequencies
ASSOCIATION OF DRIVERS AND OWNERS OF WIRELESS RADIO TAXIS KOSMOS	Ascertainment of installation and or operation of an antenna mast construction, in violation of the provisions of Law 2801/2000 and Licence conditions (private mobile radio network)
WESTERN GREECE TELEVISION – SUPER B	Use of non-assigned frequencies
TIM HELLAS	Illegal installation of antenna mast constructions (Papanastasiou St, Thessaloniki)

It should be noted that Decisions on Hearings performed by EETT are subject to judicial control in accordance with the applicable law.

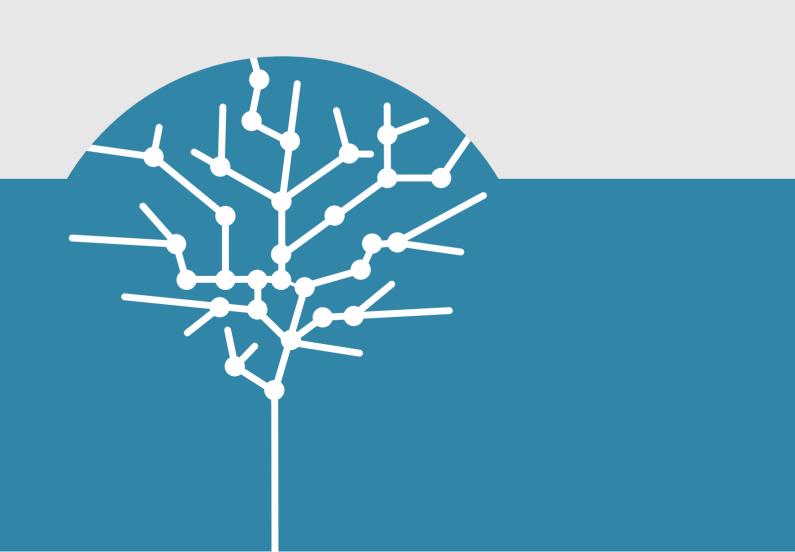
## 5.6. Goals

EETT has set the following goals for 2005 in the radio frequency spectrum sector:

- More efficient use of the scarce spectrum resource, based on technical and financial criteria.
- Optimum integration and exploitation of the NSMMS in daily operations of EETT.
- Ensuring access to the spectrum, on objective and nondiscriminatory terms, and preparation of procedures for faster availability of radio frequencies for every requested use.
- Effective monitoring of spectrum use and ensuring the terms and rules of use, so that users enjoy highquality services.
- ➤ Mechanism for the effective RTTE market supervision.
- Prompt reply to consumers' requests/ complaints submitted to EETT.



## **POSTAL SERVICES SECTOR**



## 6. Postal Services Sector

In 2004, EETT proceeded to the implementation of the new Regulatory Framework, which promotes gradual deregulation of the postal market, aiming at ensuring fair competition conditions to the benefit of consumers. EETT also upgraded the market control mechanism it has developed and performed significant number of regular and ad hoc controls on undertakings, aiming at ensuring both smooth operation of the market and consumers' interests. At the same time, EETT performed measurements of the quality of Universal Service (US). Moreover, EETT updated the Electronic Registry of Postal Undertakings, an important tool for its work.

## 6.1. Regulation of the Postal Market

# 6.1.1. Implementation of the Updated Regulatory Framework

## a. Implementation of the Regulation of General Authorizations

The implementation of the Regulation of General Authorizations for the Provision of Postal Services¹ commenced in 2004, following its enforcement as of 13 November 2003. In the light of the new Regulation, undertakings operating in the postal market were invited to adapt their operations to the new Regulatory Framework until 13 May 2004, by submitting new Declarations for the Provision of Postal Services. This resulted in the modification of 192 existing General Authorizations for the Provision of Postal Services.

The modification of General Authorizations mainly lies in the obligation, on part of those undertakings, for stating the infrastructure they have put in place, in order to ensure minimum quality requirements for the provision of postal services.

The modification of General Authorizations significantly

contributed to the rationalization of the Courier market, on the one hand due to the revocation of General Authorizations for undertakings that do not meet the operation requirements of the Regulation and on the other hand due to the penetration of new undertakings wishing to make use of the prospects offered by the market.

# b. Implementation of the Regulation for Individual Licences

The new Regulation for Individual Licences<sup>2</sup>, which was enforced as of 22 December 2003, provides for the procedure and requirements for granting Individual Licences for the provision of postal services falling under the Universal Service (US), but not under the exclusive rights of the Universal Service Provider (USP). Moreover, the Regulation provides for the obligations of postal undertakings having an Individual Licence towards consumers, as well as the pricing principles for their services. A necessary prerequisite for granting an Individual Licence is the evaluation by EETT of the potential/ capacity of the postal undertaking to provide quality and reliable services.

In the context of this Regulation, an existing Individual Licence was modified and a new request was submitted and approved, increasing the total number of undertakings to 2. The aforementioned modifications do not apply to the USP (ELTA), to which the Greek State assigned the provision of US, by concluding an Administration Contract that stands for an Individual Licence, as specified in Law 3185/2003.

# 6.1.2. Updating of the Electronic Registry of Undertakings

EETT's Electronic Registry of Postal Services is a database where the details of postal undertakings and

<sup>&</sup>lt;sup>1</sup> GG Issue 1682/B/14-11-2003.

<sup>&</sup>lt;sup>2</sup> GG Issue 1906/B/22-12-2003.

their networks are registered, enabling management and updating thereof. This is an integrated tool, facilitating the work of EETT to a great extent, given that it enables fast processing of complaints, support of EETT's controls and the issuance of certificates and other applications.

In 2004, the Registry updating continued, in the context of which 104 undertakings were rejected due to non-submission of Declarations for the Provision of Postal Services in order to adapt their operations to the new Regulatory Framework. Moreover, 77 new General Authorizations were granted, increasing the total number of active undertakings with General Authorizations to 266. It should be noted that the number of undertakings with General Authorizations operating in the Courier market was reduced by approximately 10% compared to 2003.

### 6.1.3. Briefing Postal Undertakings

On 23 June 2004, EETT organized an event entitled "The new Regulatory Framework: A Development Tool for the Courier Market". The aim of the event was to provide information to postal undertakings, but also to record the views of consumers and undertakings on the new Regulatory Framework. The event was attended by representatives of the European Commission, the Ministry of Transportation and Communications (MTC), the largest consumer organizations and postal undertakings.

The issues presented during the event included the following:

- Figures and trends of the Courier market for 2003, as derived from a survey made by EETT, on the basis of information obtained from postal undertakings.
- EETT's actions to ensure fair competition in the Courier market, to eliminate illegally operating

- undertakings and to protect consumers' rights.
- The growth models of postal undertakings' networks.

The event demonstrated the positive prospects of the Courier market in an ever developing regulatory environment, where the regulatory intervention of EETT is required on issues such as quality of services.

# 6.2. Monitoring and Control of the Postal Market

# 6.2.1. Mechanism for Monitoring and Controlling the Courier Market

In the context of its supervisory role<sup>3</sup>, EETT placed particular emphasis on the observance of competition rules and the provisions setting the pricing rules of provided services in relation to the US. EETT's monitoring work in that context mainly referred to:

- The control of undertakings with General Authorization registered with EETT Registry of Postal Undertakings, in terms of fulfilling their obligations.
- ➤ The identification of undertakings illegally operating in the field of postal services, thus without a Licence or Authorization.

The design of the procedure for the regular control of postal undertakings with a General Authorization was completed in 2004 and the procedure was implemented, upon relevant Decision' of EETT. The regular control of postal undertakings aims at confirming compliance with the terms of their Authorization, securing the exclusive rights of the USP and the observance of the Charter of Obligations to Consumers (COC).

Postal undertakings are selected for regular control based on the information kept with the Registry and the Financial Record of Postal Undertakings with a General Authorization.

<sup>&</sup>lt;sup>3</sup> See article 7(4) of Law 2668/98, as replaced by article 3(4) of Law 3185/03.

<sup>4</sup> Decision 315/87/2004.

The controlling procedure includes on-site inspection, expert opinion, sampling and filling in of a Compliance Sheet by a special Auditing Board, in relation to the following:

- Details of the Undertaking: The details of the undertaking are compared to those entered in EETT's Registry.
- b. Special Postal Items Track and Trace System (SPITTS): The information fields provided for in the undertaking's SPITTS are compared with the mandatory elements laid down by the General Authorizations' Regulation and a sampling of postal items which have been dispatched follows, in relation to their data registered in the SPITTS.
- c. USP rights: The provision of services is checked in relation to the USP exclusive rights.
- d. Express Delivery Voucher (EDV): It is checked whether the EDV used by the undertaking contains the mandatory identification elements of the postal item, in accordance with the provisions of the General Authorizations' Regulation.
- e. Main Contracts: The contracts with customers are reviewed in order to verify compliance of terms with the provisions of the aforementioned Regulation, as well as any violation of the USP rights.
- f. Fees: It is checked whether the undertaking has submitted correctly to EETT its financial figures (income from all activities and income from postal services), which are kept with the Archive of Financial Information. Control of correct payment of General Authorization fees is also performed.
- g. COC: Compliance with the COC is checked, especially as regards resolution of disputes arising from end-users of postal services.
- h. Infrastructure: The declared Network, Courier Branches and Sorting Centres is checked.
- Sorting Centre: Sampling of the items currently handled at the Sorting Centre of the undertaking takes place as far as it concerns compliance with the General Authorization terms and respect of the USP exclusive rights.

j. Network: One or more undertakings operating under the licensed undertaking's Network are checked as far as it concerns compliance with the General Authorization terms, respect for the USP exclusive rights and SPITTS interoperability with the licensed undertaking's SPITTS.

The ad hoc control of postal undertakings aims at identifying any deviations related to the undertaking's compliance with the General Authorization terms and particularly with the COC, and securing the USP's exclusive rights.

Ad hoc control is also important for the identification of undertakings providing postal services without the required General Authorization or Individual Licence. The control pertains to the identification of any illegal postal activity. The selection of undertakings subject to ad hoc control is made on the basis of information from:

- Complaints of consumers and/ or other undertakings.
- Other Public Authorities or press publications.
- Processing data from the Postal Undertakings Registry in relation to deregistrations and/ or rejections of licensed postal undertakings, as well as the Archive of Financial Information.

Postal undertakings operating without a Licence are initially identified through the Registry, where the deregistered or rejected undertakings are entered. Subsequently, the information is verified with the competent Public Tax Offices or other services, such as professional chambers, in order to identify whether these undertakings have declared interruption or change of activity or continue to provide postal services. In the second case, an ad hoc control or summon for Hearing follows, in order to confirm the information.

# 6.2.2. Conclusions from the Control of Postal Undertakings

In the context of the aforementioned control procedure, EETT performed in 2004 a number of regular and ad hoc controls, in order to determine the extent of compliance of postal undertakings with the applicable law and identify any cases of violations.

More specifically. EETT, following the controls performed in 2003 in 4 large Courier undertakings, conducted 19 regular controls, thus controlling 92% of postal traffic in total for the two years. The

conclusions that stem from the regular controls are shown in Table 25.

In addition to the aforementioned regular controls, EETT performed in 2004. 23 ad hoc controls in postal undertakings that had been deregistered from the Postal Undertakings Registry, aiming at determining any illegal operations, namely without the required General Authorization or Individual Licence. Out of these undertakings, it was found that 16 were operating without a Licence and 7 had indeed interrupted their activity. The conclusions of these ad hoc controls are laid out in Table 26.

Table 25							
Conclusions from Regular Controls in Postal Undertakings							
Type of Problem	Percentage of Frequency						
Incomplete entry of information of dispatched items in the SPITTS	64%						
Inaccurate payment of fees to EETT	53%						
Incomplete SPITTS infrastructure	52%						
Incomplete EDV fill-up	47%						
Non-compliance with COC	37%						
Investigation of services pricing towards large customers in violation of the USP rights	37%						
Investigation of infringement of the USP exclusive rights	32%						
Incomplete interoperability between SPITTS of Network undertakings	16%						
and SPITTS of the licenced undertaking							
Incomplete monitoring and handling of postal items at the Sorting Centre	16%						
Lack of SPITTS or total lack of recorded dispatch information	16%						
Differentiation of undertaking infrastructure in relation to the information registered							
with the EETT Registry	16%						

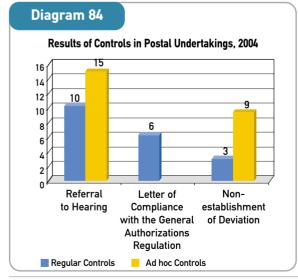
Table 26	
Conclusions from Ad Hoc Contro in Postal Undertakings	ols
Ad Hoc Control Conclusions	Percentage
Ascertainment of undertaking operation	
without a General Authorization	70%
or Individual Licence	
Ascertainment of interruption	
of works by the undertaking	30%

Moreover, EETT performed one ad hoc control in a licensed undertaking for undue payment of fees to EETT.

Following the aforementioned controls and the deriving conclusions, EETT proceeded to the following actions:

- Further investigation of the infringement by means of a hearing and imposition of penalties where deemed necessary. In this context, 10 undertakings were summoned to a Hearing following a regular control and 15 following an ad hoc control.
- Dispatch of compliance letters to undertakings for the revocation of deviations established. In this context, 6 letters with remarks were sent, in order for the undertakings to comply with the General Authorizations Regulation.

The outcome of controls is presented in the following Diagram:



<sup>&</sup>lt;sup>5</sup> Decision EETT 268/97/2002.

# 6.2.3. Evaluation of Pricing of the Universal Service Provider

In 2004, EETT proceeded to the evaluation of tariffs proposed by the USP for services under the US, based on information that the USP submitted on mail traffic volume. According to a previous Decision<sup>5</sup> of EETT, the evaluation of cost-orientation for ELTA tariffs is made, among others, on the basis of the Total Presumable Productivity Ratio (TPPR), which must have a positive value for each one of the following Universal Services: "Domestic Mail", "International Mail" and "Parcels".

The TPPR is based on the comparison of historical change in the production volume of an undertaking and the respective change in required resources, namely the operating expenses for the relevant production. The advantage of the TPPR application is that the effective management of an undertaking is evaluated in its whole in terms of the work produced, following a comparison with historical data.

For the evaluation of data submitted by the USP, EETT has set up a team of experts, which prepared a study entitled "Evaluation of Adaptation of ELTA Universal Services Tariffs for 2004".

Based on the data submitted by the USP, during the second semester of 2004, the TPPR for each one of the aforementioned Universal Services, calculated both in physical and equivalent units, remained marginally negative, but demonstrated a significant improvement trend compared to 2003 data. Therefore, EETT concluded that the adaptation of the USP budgetary accounting cost was not necessary, in accordance with Article 10 of the Regulation for the Specification of Objective Pricing Methods applied in the USP accounting system<sup>6</sup>.

<sup>&</sup>lt;sup>6</sup> Decision EETT 301/28/2003, GG Issue 1993/B/31-12-2003.

Moreover, it was established that the USP performed an allocation of data (operating income and expenses) to product categories, according to its costing system that had been approved by EETT. Therefore, it was confirmed that the cost for the provision of the US was calculated on the basis of that particular costing system. Moreover, EETT concluded that the tariffs submitted by ELTA for 2004 are common for the entire country, harmonized with the budgetary cost and do not create any problems in competition of the postal services sector.

The aforementioned evaluation study concluded that the USP, provided that it applied the increase of tariffs approved by EETT for the five-month period of 1st August to 31st December 2004 and provided that the forecasts for mail traffic were confirmed, would demonstrate an income increase of 5,434,329 euros (before deductions). Therefore, the expected surplus of the USP from Universal Services for 2004 was calculated to stand at 81,288 euros. Otherwise, a loss would be demonstrated.

For the above reasons, EETT approved the application of the proposed tariffs, which caused an average weighted increase of postal fees of 1.28% for the period from 1st August to 31st December 2004 and 3.09% on an annual basis (from 1st August 2004 to 1st August 2005),

thus almost at the level of the expected inflation rate (3.2%).

# 6.2.4. Quality Measurement of the Universal Postal Service

### **Quality Measurement for 1st Priority Domestic Mail**

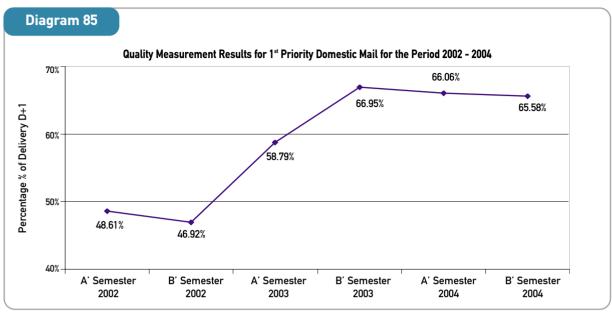
As of 1st January 2002, EETT has been performing quality measurements for 1st Priority Domestic Mail, in accordance with the provisions of Ministerial Decision (MD) 79293/20007, which lays down the specifications under which the US should be provided, for domestic and international mail. The measurement system applied by EETT ensures 95% reliability, as provided for in this MD.

Delivery percentages for 1st Priority domestic mail within one working day (D+1) and within three working days (D+3) from the working day of deposit achieved by the USP from 2002 to 2004, compared with the delivery percentages laid down in the aforementioned MD, are shown in Table 27.

The percentages mentioned in Table 27 and the average term of delivery apply to the entire country. The results apply to 1<sup>st</sup> Priority Mail deposited at the USP access points (mailboxes, etc) until noon of the working day (D).

Table 27							
	1	I <sup>st</sup> Priority Domest	tic Mail				
		_	Obligation of USP under MD 79293/2000		Results of US Quality Measurements		
Year	Semester	D+1	D+3	D+1	D+3	Average Term of Delivery (in days)	
2002	1 <sup>st</sup> Semester	77%	77% 90%	48.61%	90.86%	1.91	
2002	2 <sup>nd</sup> Semester			46.92%	89.01%	1.98	
2003	1st Semester	82%	93%	58.79%	94.87%	1.61	
2003	2 <sup>nd</sup> Semester	OZ/6	33%	66.95%	96.78%	1.44	
2004	1st Semester	85%	95%	66.06%	95.60%	1.49	
2004	2 <sup>nd</sup> Semester		33%	65.58%	93.38%	1.59	

<sup>&</sup>lt;sup>7</sup> GG Issue 1588/B/29-12-2000.



Source: EETT

In Table 27 it is demonstrated that the quality achieved by the USP for the delivery of 1st Priority Domestic Mail within one day (D+1) is inferior to the MD provisions for the entire period 2002-2004. On the contrary, the specifications laid down for delivery within three days (D+3) are met with a slight deviation for the second semester of 2002. In general, the US quality for 2004 remained at the levels of the 2nd semester of 2003.

## Quality Measurement for 1st Priority International Mail

Quality measurements of 1<sup>st</sup> Priority International Mail for all countries of the European Union (EU) are performed by the International Post Corporation (IPC). In general, and according to IPC measurements, the USP meets the quality specifications for 1<sup>st</sup> Priority International Mail.

According to the measurements for the first semester of 2004, the outgoing 1st Priority International Mail was

delivered to all European countries in accordance with the provisions of MD 79293/2000 for delivery within three days (D+3), except for Iceland to which deliveries stood at 64.9%, instead of 80% laid down in the MD. Respectively, delivery within five days (D+5) was achieved to all European countries under the specifications of the aforementioned MD, except for Spain and Iceland, where an insignificant delay was observed.

For the same period, 1st Priority International Incoming Mail from eight European countries to Greece for delivery within three days (D+3) was not delivered in accordance with the aforementioned MD. Also, delivery within five days (D+5) was achieved in accordance with the above specifications, with the exception of six countries in Zone A and two countries in Zone B, for which the delay was insignificant.

The aforementioned USP delivery percentages as regards outgoing and incoming International Mail, compared to the provisions of the MD, are shown in Tables 28 and 29 respectively.

Table 28		det D. L. C.			
		1" Priority Outgo	oing International Mail		
	Outgoing	(D+3)	Outgoing	(D+5)	
Country of Destination (from Greece)	Obligation of ELTA under MD 79293/2000	ELTA Results %	Obligation of ELTA under MD 79293/2000	ELTA Results %	Average Delivery Days
			Zone A		
Austria	85	89.4	97	98.7	2.4
Belgium	85	94.6	97	99.6	2.1
Denmark	85	92.3	97	99.5	2.2
France	85	91.7	97	99.1	2.3
Germany	85	96.4	97	99.4	2.1
Italy	85	90.3	97	98.8	2.3
Luxembourg	85	93.8	97	99.1	2.3
Netherlands	85	94.5	97	99.8	2.2
Spain	85	89.4	97	96.9	2.4
Sweden	85	91.8	97	98.7	2.3
United Kingdom	85	92.3	97	98.8	2.3
Switzerland	85	92.1	97	99.6	2.1
		:	Zone B		
Finland	80	86.1	95	99.1	2.7
Ireland	80	88.9	95	96.0	2.5
Iceland	80	64.9	95	93.3	3.4
Norway	80	93.6	95	99.6	2.2
Portugal	80	93.6	95	98.7	2.2

<sup>\*</sup> Denmark, France, Germany, Italy, Netherlands, Norway, Switzerland and United Kingdom deliver on Saturdays too.

	I	ncoming 1 <sup>st</sup> Pri	ority International Mail		
	Incoming (	(D+3)	Incoming	(D+5)	
Country of Origin (to Greece)	Obligation of ELTA under MD 79293/2000	ELTA Results %	Obligation of ELTA under MD 79293/2000	ELTA Results %	Average Delivery Days
			Zone A		
Austria	85	86.7	97	97.7	2.5
Belgium	85	87.2	97	97.6	2.6
Denmark	85	85.0	97	97.7	2.5
France	85	71.0	97	95.4	3.0
Germany	85	89.1	97	98.4	2.5
Italy	85	82.1	97	96.9	2.7
Luxembourg	85	86.0	97	99.1	2.5
Netherlands	85	85.6	97	96.7	2.8
Spain	85	75.0	97	95.4	3.0
Sweden	85	83.1	97	95.8	2.8
United Kingdom	85	74.8	97	96.4	3.0
Switzerland	85	85.6	97	97.0	2.7
			Zone B		
Finland	80	80.8	95	97.7	2.8
Ireland	80	57.4	95	87.0	3.9
Iceland	80	59.7	95	95.4	3.4
Norway	80	85.4	95	96.8	2.7
Portugal	80	54.4	95	94.9	3.5

## 6.3. Controlling - Monitoring Actions of EETT

In the context of its controlling and monitoring role under Law 2867/2000, EETT proceeded to the following Hearings in 2004.

Summary Table of Hearings					
Subject	Petitioner	Defendant	Decision No.	Pronouncement	
Violation of competition rules and the legislation on the provision of postal services	WUNDERMAN ADVERTISING	ELTA	311/60	Fine: €15,000	
Incompliance with the terms of the General Authorization and clarification of dossier information	Ex officio	INTER DELIVERY SERVICES (IDS)	313/129	Fine: €15,000	
Provision of postal services without a General Authorization	Ex officio	NINA TZAVAHIDOU- TBILISI TOURS	313/131	Fine: € 15,000	
Provision of postal services without a General Authorization	Ex officio	M.B.S. – M.B. SERVICES S.A.	316/166	Fine: €15,000	
Violation of legislation on the provision of postal services	PANMED SYSTEMS & SERVICES S.A.	TNT SKYPACK (HELLAS) LTD.	317/80	Fine: €15,000	
Provision of postal services without a General Authorization	Ex officio	DEKELIA LTD.	322/84	Fine: €15,000	
Provision of postal services without a General Authorization	ACS	S. MARTINOS N. VERRIOPOULOS	332/140	Fine: € 16,000	
Provision of postal services without a General Authorization	ACS	APOSTOLOS G. KARTALOGLOU	332/141	Fine: € 16,000	
Provision of postal services without a General Authorization	ACS	OMIROS MALAPANIS & CO	332/142	Fine: €15,000	
Provision of postal services without a General Authorization	ACS	EVANGELOS KATSOULIS & CO	332/143	Fine: € 16,000	
Provision of postal services without a General Authorization	ACS	G. KARANASOS- E. MARKOULIS LTD.	332/144	Fine: €16,000	
Provision of postal services without a General Authorization	Ex officio	FLASH RUNNER COURIER LTD.	332/145	Fine: €31,000	
Provision of postal services without a General Authorization	ACS	I. KARAKOSTA & CO	332/146	Fine: €16,000	
Provision of postal services without a General Authorization	ACS	S. PARASCHOUDIS & CO	332/147	Fine: € 16,000	
Provision of postal services without a General Authorization	ACS	STEF. BABATSANIS & CO	332/148	Fine: €16,000	
Provision of postal services without a General Authorization	ACS	G. PAPAKONSTANTINO- POULOS - D. ROTAS	332/149	Fine: €16,000	
Provision of postal services without a General Authorization	ACS	PANAYIOTA SANDALI	333/141	Fine: € 16,000	

Subject	Petitioner	Defendant	Decision No.	Pronouncement
Provision of postal services	ACS	VASILIOS	333/142	Fine:
without a General Authorization		KEFALAS & CO		€15,000
Provision of postal services	ACS	GEORGIOS N.	333/143	Fine:
without a General Authorization		VERGIANIS		€16,000
Provision of postal services	ACS	ANGELOS	333/144	Fine:
without a General Authorization		PAPADATOS & CO		€16,000
Provision of postal services	ACS	TH. PAPADOPOULOS	333/145	Fine:
without a General Authorization		- K. PREVYZIS		€16,000
Clarification of information submitted	Ex officio	ACS S.A.	336/71	Fine:
with the Fees Payment Statements				€25,000
for 1999, 2000 and 2001 and incompliance				
with the terms of the General Authorization				
Provision of postal services	ACS	IOANNIS	336/72	Fine:
without a General Authorization		ANT. PAPPAS		€16,000
Provision of postal services	ACS	G. MILKAS -	336/73	Fine:
without a General Authorization		A. KYRIAZIS –		€16,000
		A. ZACHARIADIS		
Provision of postal services	ACS	KONSTANTINOS	336/74	Fine:
without a General Authorization		TSIMAKIS		€15,000
Provision of postal services	ACS	OKTANA LTD.	336/75	Fine:
without a General Authorization				€16,000
Provision of postal services	ACS	VANGELIS	336/76	Fine:
without a General Authorization		BALOMENAKIS		€16,000
Provision of postal services	ACS	ELENI SERESIOTI	336/77	Fine:
without a General Authorization				€16,000
Provision of postal services	ACS	P. KOUZOF & CO	336/78	Fine:
without a General Authorization				€15,000
Provision of postal services	ACS	VASILIKI	336/79	Fine:
without a General Authorization		BOUKOUVALA		€16,000
Provision of postal services	ACS	ATHANASIOS AL.	336/80	Fine:
without a General Authorization		SAPLAOURAS		€16,000
Provision of postal services	ACS	EM. KOUTSIAS –	338/109	Fine:
without a General Authorization		AL. DIMAS		€16,000
Provision of postal services	ACS	N. PAPAGEORGIOU –	338/110	Fine:
without a General Authorization		G. ALEXOPOULOS		€ 20,000
Provision of postal services	ACS	G. KARANASOS & CO	338/111	Fine:
without a General Authorization				€16,000
Provision of postal services	ACS	P. BIS & CO	338/112	Fine:
without a General Authorization	7100	1.55400	000/112	€16,000

Subject	Petitioner	Defendant	Decision No.	Pronouncement
Provision of Courier services	ACS	SPEED AIR S.A.	338/113	Fine:
without a General Authorization				€15,000
Provision of postal services	ACS	PANAYIOTA G. LOLOU	339/50	Fine:
without a General Authorization				€16,000
Provision of postal services	ACS	CHARALAMBOS	339/51	Fine:
without a General Authorization		GEORGANTAS		€16,000
Provision of postal services	CS	ASTERIOS	339/52	Fine:
without a General Authorization		AGIANNAKARIS – MARIA KOKKINOU		€15,000
Provision of postal services	ACS	CHARALAMBOS	339/53	Fine:
without a General Authorization		KAPETANAKIS		€15,000
Provision of postal services	ACS	DESPINA K. DARDANI	339/54	Fine:
without a General Authorization				€16,000
Provision of postal services	ACS	CHRISTOS V. DELLIOS	339/55	Fine:
without a General Authorization				€16,000
Incompliance with the terms	Ex officio	ERMIS COURIER	308/60	Recom-
of the General Authorization		EXPRESS		mendation
and clarification of dossier information				
Incompliance with the terms	Ex officio	ELTA COURIER	308/61	Recom-
of the General Authorization				mendation
Clarification of Network use	Individual	ELTA COURIER	313/130	Recom-
(postal offices, etc) of the USP				mendation
Mail Collection and distribution	Individual	ELTA	314/143	Recom-
for residents in Drafi, Pikermi, via post office boxes				mendation
Provision of Courier services	Ex officio	TACHIEXIPIRETISI-	322/85	Recom-
without a General Authorization		EXPRESS COURIER -		mendation
		NEMESIS EXPRESS		
Incompliance with the terms	Individual	ACS S.A.	331/107	Recom-
of the General Authorization				mendation
Clarification of information	Ex officio	ACS S.A.	336/71	Recom-
submitted with the Fees Payment				mendation
Statements for 1999, 2000 and 2001				
and incompliance with the terms of the				
General Authorization				
Incompliance with the terms	Ex officio	TACHIMETAFORES	311/57	Warning
of the General Authorization		SERVANT LTD.		
Incompliance with the terms of the General Authorization	Ex officio	GOLD MAIL S.A.	311/58	Warning

Subject	Petitioner	Defendant	Decision No.	Pronouncement
Incompliance with the terms of the General Authorization and clarification of dossier information	Ex officio	EKATERINI TSARBOU - PASIFIC COURIER	311/59	Warning
Incompliance with the terms of the General Authorization	Ex officio	TACHIMETAFORES PAKO SERVANT LTD.	312/56	Warning
Incompliance with the terms of the General Authorization	Ex officio	INTERMAIL S.A.	313/128	Warning
Incompliance with the terms of the General Authorization	Ex officio	UPS OF GREECE INC S.A.	316/167	Warning
Incompliance with the terms of the General Authorization	Ex officio	INTERPOST S.A.A.	326/219	Warning
Incompliance with the terms of the General Authorization	Ex officio	N. DRAKOMA- THIOULAKIS & CO	326/220	Warning
Incompliance with the terms of the General Authorization	Ex officio	CH. GENOS – E. SAMARA LTD.	326/221	Warning
Incompliance with the terms of the General Authorization	Ex officio	EVANGELOS KALAFATIS	326/223	Warning
Incompliance with the terms of the General Authorization	Ex officio	OFFICE EXPRESS LTD.	327/90	Warning
Incompliance with the terms of the General Authorization	Ex officio	IDP EXPRESS INTERNATIONAL DOCUMENTS & PARCELS TRANSPORTATION S.A.	327/91	Warning
Incompliance with the terms of the General Authorization	Ex officio	ARAMEX (HELLAS) INTERNATIONAL S.A.	327/92	Warning
Incompliance with the terms of the General Authorization	Ex officio	E. BEIKO & CO	331/100	Warning
Incompliance with the terms of the General Authorization	Ex officio	ANNA MALLIARAKI- MALIAROU	331/101	Warning
Incompliance with the terms of the General Authorization	Ex officio	ALEXANDROS VEVOPOULOS	331/102	Warning
Incompliance with the terms of the General Authorization	Ex officio	LAMBROUSI BROS  – K. SKARGIOTI	331/103	Warning
Incompliance with the terms of the General Authorization	Ex officio	NIKOLAOS XYDIS	331/104	Warning
Incompliance with the terms of the General Authorization	Ex officio	CHRISTINA APOSTOLATOU	331/105	Warning
Incompliance with the terms of the General Authorization	Ex officio	CHRISTOS VAGIAS	331/106	Warning

Subject	Petitioner	Defendant	Decision No.	Pronouncement
Incompliance with the terms of the General Authorization	Ex officio	IOANNIS APOSTOLIDIS	331/98	Warning
Incompliance with the terms of the General Authorization	Ex officio	INTERNATIONAL TRAFFIC COURIER LTD.	331/99	Warning
Clarification of evidence as a result of control	Ex officio	INTERATTICA S.A. COURIER NETWORK	338/114	Warning
Provision of postal services without a General Authorization		L. I. BALKAN TRANS LTD.	314/144	Release
Incompliance with the terms of the General Authorization	Individual	SPEEDEX S.A.	314/145	Release
Provision of postal services without a General Authorization	Ex officio	N. PANAYIOTOPOULOS	314/146	Release
Provision of postal services without a General Authorization	Ex officio	IOANNIS-CHARA- LAMBOS DASKALAKIS	320/89	Release
Control of US provision quality	Ex officio	ELTA	308/59	Dispatch of the EETT Decision to the Minister of Transportation and Communications for the imposition of penalties
Provision of postal services without a General Authorization	Ex officio	IOANNIS ALEXANDROS IAKOVIDIS	326/222	Release
Provision of postal services without a General Authorization	Ex officio	ALMAN HELLAS DISTRICT SYSTEMS LTD.	327/89	Release
Provision of postal services without a General Authorization	Ex officio	TRUST MAIL COURIER LTD.	330/75	Release
Provision of postal services without a General Authorization	Ex officio	GENERAL EXPRESS LTD.	330/76	Release

Finally, the aforementioned Hearings had the following results.

	Summary Table of Fines		
Provider	Subject	Fine (euro)	Decision No.
ELTA	Violation of competition rules and the legislation	15,000	311/60
	on the provision of postal services		
INTER DELIVERY	Incompliance with the terms of the General	15,000	313/129
SERVICES (IDS)	Authorization and clarification of dossier		
	information		
NINA TZAVAHIDOU-	Provision of postal services	15,000	313/131
TBILISI TOURS	without a General Authorization		
M.B.S. –	Provision of postal services	15,000	316/166
M.B. SERVICES S.A.	without a General Authorization		
TNT SKYPACK	Violation of legislation on the provision	15,000	317/80
(HELLAS) LTD.	of postal services		
DEKELIA LTD.	Provision of postal services	15,000	322/84
	without a General Authorization		
S. MARTINOS	Provision of postal services	16,000	332/140
N. VERRIOPOULOS	without a General Authorization		
APOSTOLOS	Provision of postal services	16,000	332/141
KARTALOGLOU	without a General Authorization		
OMIROS	Provision of postal services	15,000	332/142
MALAPANIS & CO	without a General Authorization		
EVANGELOS	Provision of postal services	16,000	332/143
KATSOULIS & CO	without a General Authorization		
G. KARANASOS-	Provision of postal services	16,000	332/144
E. MARKOULIS	without a General Authorization		
FLASH RUNNER	Provision of postal services	31,000	332/145
COURIER LTD.	without a General Authorization		
I. KARAKOSTA & CO	Provision of postal services	16,000	332/146
	without a General Authorization		
S. PARASCHOUDIS	Provision of postal services	16,000	332/147
& CO	without a General Authorization		
STEF. BABATSANIS	Provision of postal services	16,000	332/148
& CO	without a General Authorization		
G. PAPAKONSTANTI-	Provision of postal services	16,000	332/149
NOPOULOS -	without a General Authorization		
D. ROTAS			
PANAYIOTA	Provision of postal services	16,000	333/141
SANDALI	without a General Authorization		

Provider	Subject	Fine (euro)	Decision No.
VASILIOS	Provision of postal services	15,000	333/142
KEFALAS & CO	without a General Authorization		
GEORGIOS	Provision of postal services	16,000	333/143
N. VERGIANIS	without a General Authorization		
ANGELOS	Provision of postal services	16,000	333/144
PAPADATOS & CO	without a General Authorization		
TH. PAPADOPOULOS -	Provision of postal services	16,000	333/145
K. PREVYZIS	without a General Authorization		
ACS S.A.	Clarification of information	25,000	336/71
	in the Fees Payment Statements submitted		
	for 1999, 2000 and 2001 and incompliance		
	with the terms of the General Authorization		
IOANNIS	Provision of postal services	16,000	336/72
ANT. PAPPAS	without a General Authorization		
G. MILKAS –	Provision of postal services	16,000	336/73
A. KYRIAZIS –	without a General Authorization		
A. ZACHARIADIS			
KONSTANTINOS	Provision of postal services	15,000	336/74
TSIMAKIS	without a General Authorization		
OKTANA LTD.	Provision of postal services	16,000	336/75
	without a General Authorization		
VANGELIS	Provision of postal services	16,000	336/76
BALOMENAKIS	without a General Authorization		
ELENI SERESIOTI	Provision of postal services	16,000	336/77
	without a General Authorization		
P. KOUZOF & CO	Provision of postal services	15,000	336/78
	without a General Authorization		
VASILIKI	Provision of postal services	16,000	336/79
BOUKOUVALA	without a General Authorization		
ATHANASIOS	Provision of postal services	16,000	336/80
AL. SAPLAOURAS	without a General Authorization		
EM. KOUTSIAS –	Provision of postal services	16,000	338/109
AL. DIMAS	without a General Authorization		
N. PAPAGEORGIOU -	Provision of postal services	20,000	338/110
G. ALEXOPOULOS	without a General Authorization		
G. KARANASOS & CO	Provision of postal services	16,000	338/111
	without a General Authorization		
P. BIS & CO	Provision of postal services	16,000	338/112
	without a General Authorization		
SPEED AIR S.A.	Provision of Courier services	15,000	338/113
	without a General Authorization		

Provider	Subject	Fine (euro)	Decision No.
PANAYIOTA G. LOLOU	Provision of postal services	16,000	339/50
	without a General Authorization		
CHARALAMBOS	Provision of postal services	16,000	339/51
GEORGANTAS	without a General Authorization		
ASTERIOS	Provision of postal services	15,000	339/52
GIANNAKARIS –	without a General Authorization		
MARIA			
KOKKINOU LTD.			
CHARALAMBOS	Provision of postal services	15,000	339/53
KAPETANAKIS	without a General Authorization		
DESPINA K. DARDANI	Provision of postal	16,000	339/54
	services without a General Authorization		
CHRISTOS V. DELLIOS	Provision of postal services		
	without a General Authorization	16,000	339/55

Summary Table of Recommendations				
Provider	Subject	Decision No.		
ERMIS COURIER	Incompliance with the terms of the General	308/60		
EXPRESS	Authorization and clarification of dossier information			
ELTA COURIER S.A.	Incompliance with the terms of the General Authorization	308/61		
ELTA	Clarification of Network use (postal offices, etc) of the USP	313/130		
ELTA	Collection and distribution of mail of residents	314/143		
	in Drafi, Pikermi, via post office boxes			
TACHIEXIPIRETISI-	Provision of Courier services without a General Authorization	322/85		
EXPRESS COURIER -				
NEMESIS EXPRESS				
ACS S.A.	Incompliance with the terms of the General Authorization	331/107		
ACS S.A.	Clarification of information in the Fees Payment Statements	336/71		
	submitted for 1999, 2000 and 2001 and incompliance			
	with the terms of the General Authorization			

	Summary Table of Warnings	
Provider	Subject	Decision No.
TACHIMETAFORES SERVANT LTD.	Incompliance with the terms of the General Authorization	311/57
GOLD MAIL S.A.	Incompliance with the terms of the General Authorization	311/58
EKATERINI TSARBOU - PASIFIC COURIER	Incompliance with the terms of the General Authorization and clarification of dossier infomation	311/59
TACHIMETAFORES PAKO SERVANT LTD.	Incompliance with the terms of the General Authorization	312/56
INTERMAIL S.A.	Incompliance with the terms of the General Authorization	313/128
UPS OF GREECE INC S.A.	Incompliance with the terms of the General Authorization	316/167
INTERPOST S.A.A.	Incompliance with the terms of the General Authorization	326/219
N. DRAKOMATHIOULAKIS & CO	Incompliance with the terms of the General Authorization	326/220
CH. GENOS – E. SAMARA LTD.	Incompliance with the terms of the General Authorization	326/221
EVANGELOS KALAFATIS	Incompliance with the terms of the General Authorization	326/223
OFFICE EXPRESS LTD.	Incompliance with the terms of the General Authorization	327/90
IDP EXPRESS S.A.	Incompliance with the terms of the General Authorization	327/91
ARAMEX (HELLAS) INTERNATIONAL S.A.	Incompliance with the terms of the General Authorization	327/92
E. BEIKO & CO	Incompliance with the terms of the General Authorization	331/100
ANNA MALLIARAKI - MALIAROU	Incompliance with the terms of the General Authorization	331/101
ALEXANDROS VEVOPOULOS	Incompliance with the terms of the General Authorization	311/102
LAMBROUSI BROS – K. SKARGIOTI	Incompliance with the terms of the General Authorization	331/103
NIKOLAOS XYDIS	Incompliance with the terms of the General Authorization	331/104
CHRISTINA APOSTOLATOU	Incompliance with the terms of the General Authorization	331/105
CHRISTOS VAGIAS	Incompliance with the terms of the General Authorization	331/106
IOANNIS APOSTOLIDIS	Incompliance with the terms of the General Authorization	331/98
INTERNATIONAL		
TRAFFIC COURIER LTD.	Incompliance with the terms of the General Authorization	331/99
INTERATTICA S.A.	Clarification of evidence as a result of control	338/114

It should be noted that Decisions on Hearings performed by EETT are subject to judicial control in accordance with the applicable law.

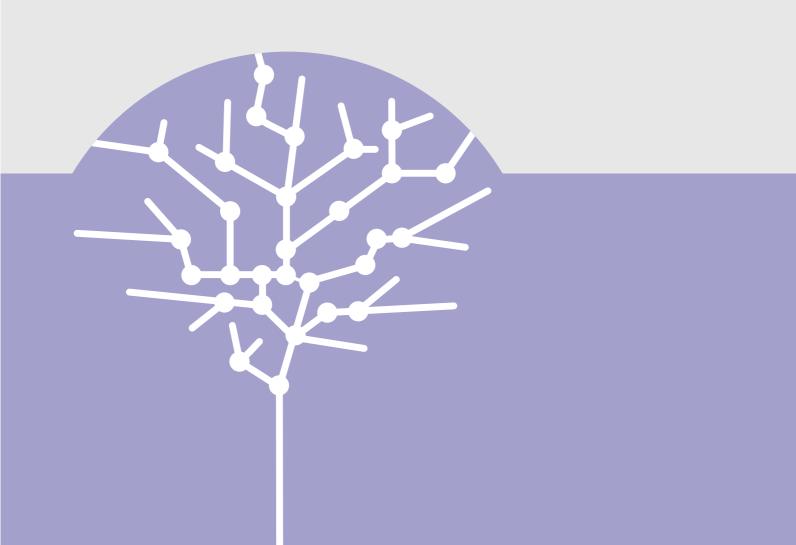
### 6.4. Goals

In the postal services sector EETT has set the following goals for 2005:

- ➤ To continue measurement of the US provision quality for Domestic and International Mail. Measurement of Domestic Mail quality shall be implemented by an independent agency jointly with the USP.
- ➤ To inform and prepare the postal market for the next deregulation stage anticipated for the year 2006.
- ➤ To revise, where appropriate, the regulatory framework of the postal services sector, especially as regards the framework for granting postal services Authorizations and Licences.

- ➤ To continue monitoring the deregulated postal market, by performing regular and ad hoc controls in undertakings operating in the sector, all over the Greek territory.
- To secure access to networks and services, ongoing information and protection of all postal services end-users' rights in Greece.

## **EUROPEAN & INTERNATIONAL PARTNERSHIPS**



## 7. European & International Partnerships

This Chapter presents the main actions of EETT in international relations. This specific sector constitutes a major activity of EETT, since it aims at ensuring EETT's participation in the development and establishment of regulatory progress at the European level mainly, and in parallel, the representation of EETT's work at international fora. Collaboration with other European National Regulatory Authorities (NRAs) of electronic communications, the European Commission, and other international institutions are a daily practice for EETT.

More specifically, this Chapter examines the role and the work of the European Regulators Group (ERG) and the Independent Regulators Group (IRG), as well as the contribution of EETT in the achievement of their goals, but also EETT's participation in other official committees of the European Commission. Moreover, reference is made to the progress of Greece, as reflected in the 10th Report of the European Commission on European Electronic Communications Regulation and Markets 2004. Finally, EETT's actions are described at an international level, via its participation in regional conferences and bilateral partnerships.

### 7.1. European Union

## 7.1.1. European Regulators Group

The new Regulatory Framework (NRF) puts special emphasis on the role that NRAs must play in the consistent implementation of NRF provisions by all member states. Moreover, the NRF presents the NRA competencies and establishes the necessary procedures, which will guarantee the harmonised

implementation of the Framework across the European Union (EU).

In July 2002' the European Commission issued a Decision, establishing the ERG2, the main task being to act as the interface connection between NRAs and the European Commission, thus contributing to the development of the internal market. The ERG aims at encouraging collaboration and coordination between NRAs and the European Commission, in order to promote the development of the internal market for electronic communications of networks and services, and seek consistent implementation by all member states of the provisions laid down in the Directives of the NRF.

The ERG consists of the 25 EU NRAs, and 6 observer NRAs (Iceland, Lichtenstein, Norway, Switzerland and from 1st April 2004 Bulgaria and Romania). It should be noted that high-ranking European Commission representatives also participate in the works of the ERG. In early 2004, the ERG prepared a joint work program with the IRG (see subsection 7.1.2.), for the implementation of which all ERG members, EETT included, worked systematically.

### 7.1.2. Independent Regulators Group

The IRG was established in 1997, as an informal group of European NRAs focusing on issues regarding electronic communications, aiming at the exchange of views, experiences and practices among its members concerning issues of common regulatory interest. The IRG members are the 31 European NRAs (25 member states, and Bulgaria, Iceland, Lichtenstein, Norway,

<sup>1</sup> OJ L 200 of 30-07-2002, p. 0038.

<sup>&</sup>lt;sup>2</sup> OJ L 293 of 16-09-2004, p. 0030.

Romania and Switzerland). In order to achieve greater transparency and separate roles, the ERG and IRG adopted a joint work program for 2004.

The IRG Working Groups are responsible for the execution of the work program and the Plenary of Presidents approves the final deliverables. The IRG Working Groups are as follows:

- Fixed Networks: Deals with issues pertaining to fixed networks, as these arise from the new Regulatory Framework and mainly the Directives on Access and Interconnection, focusing on broadband issues.
- Significant Market Power (SMP): Competent in terms of competition and mainly the definition of relevant markets and the designation of SMP operators in the individual markets.
- 3. Mobile Markets: Processes regulatory issues related to the mobile market.
- 4. Regulatory Accounting: Reviews regulatory accounting and cost analysis issues.
- End Users: Deals with regulatory issues directly
  affecting consumers, such as, among others,
  publication and availability of information, setting
  measures for the transparency of retail tariffs, and
  clarification of contracts made with operators.
- Market Analysis: Engages in the identification of suitable statistical tools to allow comparison at the European level, and the provision of information about the market to other Working Groups.
- Implementation: Aims at developing the necessary procedures for compliance with harmonized practices in all member states, in the application of the new Regulatory Framework Directives.
- 8. IRGIS: This Working Group has created an intranet portal accessed by all IRG members and enables the exchange of information, also acting as the virtual library of the Group.

The Contact Network coordinates the work of the

Working Groups and constitutes the last "filter" in the preparation of Plenary Meetings.

In 2004, the EETT Administration actively participated in the conclusions of Plenary Meetings and its experts took part in the activities of the Working Groups. The IRG, in the context of achieving the goal of harmonized practices in a single European market of electronic communications, has adopted a number of documents on the aforementioned issues, pertaining to Principles of Implementation and Best Practices (PIBs), Reports, Benchmarks or even consultation documents.

As already mentioned, the ERG and IRG have adopted a joint work program for 2004. One of the most important achievements was the adoption of a common position for the appropriate regulatory obligations that may be imposed by the NRAs to operators, under the new Regulatory Framework. At the relevant public Hearing held in January 2004, special interest was demonstrated by the sector in the ERG decisions on regulatory obligations. The relevant text is now a significant point of reference for all NRAs in the work undertaken for the above subject.

Also, the ERG expressed its opinion on the revision of the European Commission Recommendation of 1998 regarding accounting separation and cost accounting. This way, the ERG submitted to the European Commission the views of all European NRAs in a number of costing and accounting issues in which they have already acquired significant experience.

Moreover, of high significance is expected to be the work commenced by the ERG during 2004 regarding wholesale international roaming in Europe. For this reason, all European NRAs, with the support of the European Commission, sent in December 2004 a

common questionnaire to Mobile Telephony Operators (MTOs) operating in their territories, aiming at collecting the necessary information in an effort to identify the appropriate regulation in this market and to reduce charges imposed on consumers all over Europe.

Voice Over IP (VoIP) was also reviewed by NRAs and the first steps in the processing of relevant issues have already been taken. Moreover, the collaboration of the ERG with the European Commission became closer, in a context of common goals. It is worth noticing that during 2004, the ERG conducted several Public Consultations, enabling interested parties to express their views and actively contribute to the Group's work. The increased number of replies shows the interest of the market and the fact that the ERG has successfully depicted the needs of the electronic communications sector in Europe.

### 7.1.3. Other Official Committees

EETT also participated in the meetings of European Commission groups regarding issues in its field of responsibility. These include:

- Communication Committee (COCOM): Its main role, among others, is to assist the European Commission and, taking the EU policy into account, encourage exchange of information between member states as regards the development of regulatory actions in the field of electronic communications networks and services<sup>3</sup>.
- Radio Spectrum Policy Group (RSPG): It was established by means of a European Commission Decision for assisting in the preparation of binding implementation measures in terms of

- harmonized conditions of provision and efficient use of the radio spectrum".
- Radio Spectrum Committee (RSC): Established by a European Commission Decision aiming at ensuring harmonized requirements for the provision and efficient radio spectrum use, necessary for the establishment and operation of the internal market in community policy fields, such as electronic communications, transport, research and development.
- ➤ Telecommunication Conformity Assessment and Market Surveillance Committee (TCAM): Established to assist the European Commission to express opinions in relation to supervisory duties in terms of implementation of the Directive 1999/5/EC and, where appropriate, issue guidelines on individual issues.
- Administrative Cooperation Group (ADCO): Its main competence lies in the support of actions related to ensuring appropriate implementation of Directive 1999/5/EC and a harmonized approach with problems pertaining to the surveillance of the Radio Equipment and Terminal Telecommunications Equipment market (RTTE).
- Postal Directive Committee: Established following Directive 1997/67/EC⁵ to assist the European Commission and express opinions on draft measures related to common rules on the development of the internal market of EU postal services, and the improved quality of provided services

Moreover, EETT was represented by its experts in works of EUROSTAT groups, the Electronic Communication Committee (ECC) and the Forum of European Supervisory Authorities for Electronic Signatures (FESA).

<sup>&</sup>lt;sup>3</sup> Directive 2002/21/EC, OJ L108 of 24-04-2002, p. 0033.

<sup>4</sup> Decision 2002/622/EC, OJ L198 of 27-07-2002, p. 0049.

<sup>&</sup>lt;sup>5</sup> OJ L15 of 21-01-1998, p. 0014.

### 7.1.4. 10<sup>n</sup> Report of the European Commission<sup>6</sup>

The Commission annually issues a Report on European Electronic Communications Regulation and Markets, which depicts the course of the European market, with references to the progress made by each member state.

In December 2004, the 10th Report was published, regarding the 25 member states. This Report involves a summary presentation of the most important developments in the European market of electronic communications, and the most significant regulatory issues, which arose during the year. More specifically, the European Commission recognized the progress achieved in the sector and the dynamic development of mobile and broadband communications but it also repeated the need for complete and immediate implementation of the new Regulatory Framework in all member states. It is noted that electronic communications in the EU showed signs of increased competition in several markets, which had a positive effect on prices, quality, but also on the innovativeness of offered services. EETT, among other competent institutions, collaborated with the European Commission and procured the necessary information about the telecommunication market in Greece, which, according to the Report, shows a stable development each year.

The main findings about Greece concerned, among others, the following:

### a) EETT performance

- The action and effectiveness of EETT in the market regulation and monitoring was acknowledged.
- Concerns were expressed about the high numbers of appeals, mainly submitted by OTE, against EETT decisions.

- ➤ The effective implementation of dispute resolution procedures was saluted, but the room for improvement in the speed of the relevant Decisions publication was also noted.
- Reference was made to the low level of imposed fines

# b) Implementation of the New Regulatory Framework (NRF)

The analysis of individual markets, according to the NRF, had already begun by EETT. In particular, the market analysis on call termination to mobile networks had been completed and the procedure for the definition and analysis of the remaining markets had begun.

### c) Fixed telephony

- Alternative operators acquired a market share.
- The incumbent operator has almost maintained monopoly in the Access market.
- The OTE win-back campaigns had a negative effect on the development of competition.

### d) Mobile telephony

- Mobile penetration was higher than the EU average.
- High termination fees from fixed to mobile exceeded the EU average by about 20%. It was noted, though, that they were reduced by about 15% from 1st November 2004.
- The final Public Consultation was held about the regulatory measures for the market of mobile call termination.
- e) Universal Service (US): Comprehensive Directory
- ➤ The MTOs refused to provide information about the issue of a Comprehensive Directory.
- ➤ EETT held Hearings and imposed fines in that respect.

http://europa.eu.int/information\_society/topics/ecomm/all\_about/implementation\_enforcement/annualreports/10threport/text\_en.htm.

f) Local Loop Unbunding (LLU)

- > The number of LLU lines was particularly low.
- Problems arose in the collocation and provision of related facilities.

### g) Broadband Access

- ➤ The penetration of broadband lines in the population was extremely low.
- ➤ The penetration of ADSL (ADSL lines to main telephony lines) was extremely low.

## 7.2. International Partnerships

In 2004, EETT continued its actions at an international level, either by participating in regional conferences or in the framework of bilateral partnerships, and presented its work and individual suggestions in regulatory issues of electronic communications.

#### **European Countries**

For the second year, EETT participated in a regional conference organized by the Regulatory Authority of Montenegro on regulatory issues in telecommunications sector and in particular related to US implementation issues. Also, an initial partnership framework was developed with Serbian institutions, where a NRA is expected to be established. Moreover, it took part in a European meeting regarding the promotion of competition in electronic communications, a conference on mobile communications about repercussions on health, environment and the society, but also in a Balkan conference about LLU technologies.

Members of the Spectrum Directorate collaborated with experts of the German NRA (RegTP) on radio spectrum monitoring issues. Also, in the framework of preparation of the Spectrum Directorate for the successful completion of works during the Olympic Games in Greece, a delegation visited the NRA of

Portugal (ANACOM), which had gained significant experience in issues of radio spectrum monitoring during the European Football Championship in 2004.

#### Asia

In reply to an invitation of the Bahraini NRA (TRA), EETT signed a relevant Memorandum of Understanding (MoU), based on which collaboration commenced on regulatory issues of the telecommunication market. Representatives of the two agencies exchanged information and practices in issues related to their daily regulatory field of action.

#### **America**

In 2004, EETT had the opportunity to collaborate with its partners from the United States of America (USA). Members of the Federal Communications Committee (FCC) visited EETT in spring, obtained information about its work and potential partnerships were looked into. Also, in the framework of the official visit of the FCC President at the IRG Plenary in Nicosia, the NRAs Presidents were informed about regulatory developments taking place in the two continents and focused on fields such as broadband, mobile termination fees and the future of spectrum auctions.

#### **International Telecommunication Union**

In 2004 EETT continued following up international developments in electronic communications and spectrum, mainly through its participation, in meetings of the International Telecommunication Union (ITU). An EETT delegation from the Spectrum Directorate attended the works of the Regional Radio Communications conference (RRC 2004) which aimed at specifying the transition schedule from analog to digital radio-television services. Also, EETT, with the support of the Ministry of Transportation and Communications (MTC), participated in the shaping of

7

national positions for the World Telecommunications Standardization Assembly (WTSA), organized under the auspices of the ITU. Finally, EETT experts took part in ITU meetings related to competition and Interconnection.

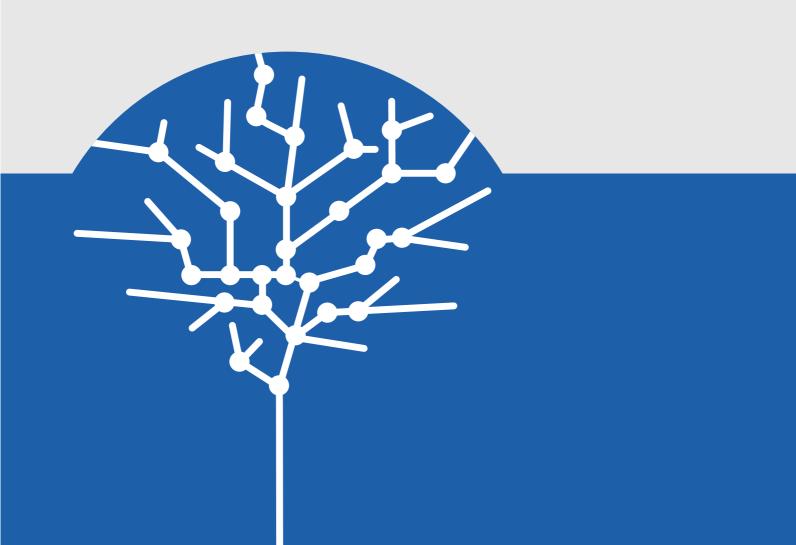
## **7.3. Goals**

EETT has set the following goals for 2005 as regards International and European Partnerships.

- Continuous participation in the shaping of telecommunications regulatory developments, especially through the ERG.
- Monitoring and continuous participation in the shaping of European developments in radio frequency spectrum sector.
- Continuous collaboration with the European Commission on issues of competence. Further development of EETT's presence in regional conferences and bilateral partnerships.



### **EETT: ORGANIZATIONAL DEVELOPMENT**



### 8. EETT: Organizational Development

In accordance with Law 2867/2000, EETT is an Independent Administrative Authority, enjoying administrative and financial independence. Its main role is to supervise and regulate the telecommunications and postal market in Greece. Its aim is the smooth operation of the two markets in a competitive environment on the one hand and the protection of consumers' rights on the other hand.

EETT competences lie in the following:

- Licensing and surveillance of the telecommunications and postal market.
- > Ensuring Access and Interconnection conditions.
- Care for the creation of fair competition conditions.
- Ensuring the provision of Universal Service (US).
- Protection of users rights.
- Radio frequency spectrum management and monitoring.
- Issues of Electronic Signature and Domain Names holding the [.gr] suffix.

This chapter analyses the actions pertaining to the structure and the framework of EETT's internal organization. Moreover, the projects integrated in the Operational Program "Information Society" (OP IS) under the 3<sup>rd</sup> Community Support Framework (3<sup>rd</sup> CSF) and the course of their implementation are presented, as well as the EETT Management Plan, which summarizes all its strategic directions and

actions. In parallel, reference is made to the Information Technology (IT) infrastructure of EETT that facilitates and renders EETT's daily work more efficient, and improves the quality of the services provided. Moreover, EETT web site is presented, which constitutes a central point of reference for the publication of information related to EETT work, as well as the telecommunications and postal market in general. Finally, the financial data of EETT are presented.

#### 8.1. Internal Organization

#### 8.1.1. Organizational Structure

**EETT** consists of:

- ➤ The nine-member Committee which consists of the President, the Vice-President for Telecommunications, the Vice-President for Postal Services and 6 Members. The Committee is selected by the Conference of Parliament Presidents and is appointed by means of decision of the Minister of Transportation & Communications.
- > The Legal Advisor.
- ➤ The Experts.
- The Permanent Personnel.

EETT's organizational structure is specified in Presidential Decree 387/2002<sup>1</sup>. The Organizational Chart is presented in detail in Figure 3 (see page 196).

<sup>&</sup>lt;sup>1</sup> "Internal Structure of the Hellenic Telecommunications and Post Commission, qualifications and method for the selection of supervisors and similar provisions" (GG Issue 335/A/31-12-2002).

#### 8.1.2. Human Resources

At the end of 2004, EETT's personnel stood at 160 employees compared to 131 at the end of 2003. Out of the above, 103 are permanently employed. 34 are employed under a definite time labour agreement and 20 as external associates-members of Working Groups. Moreover, there are 3 seconded policemen serving at EETT for the meeting of relevant spectrum monitoring

needs. The evolution of EETT's human resources is presented in Chart 86 and the number of employees per category of personnel in Table 30.

The educational level of human resources is shown in Chart 87. As regards permanent personnel, as of 31<sup>st</sup> December 2004 it included the specialties shown in Chart 88. Also, the Experts consisted of 64 scientists, in their majority engineers-physicians

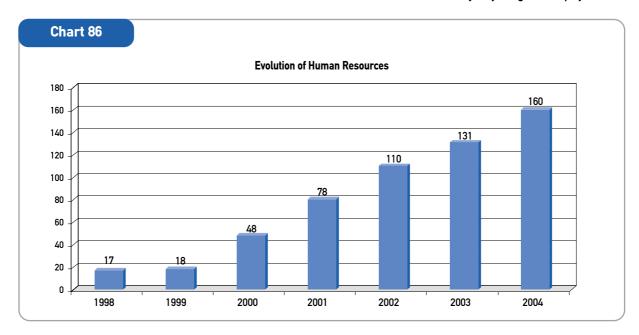
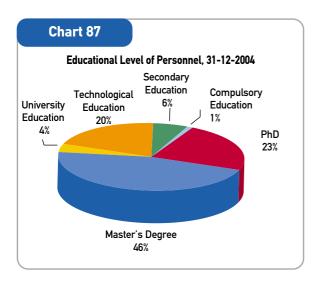
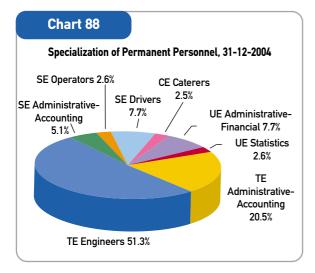
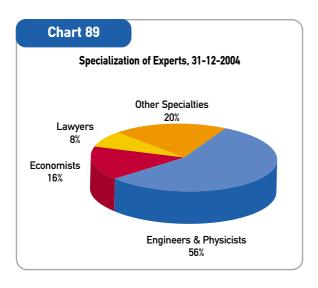


Table 30									
Number of Employees per Category, 1998 - 2004									
	31-12-98	31-12-99	31-12-00	31-12-01	31-12-02	31-12-03	31-12-04		
Experts	-	-	26	37	56	69	64		
Permanent Personnel									
of University Education (UE)	-	-	-	3	4	4	4		
Permanent Personnel of Higher									
Technological Education (TE)	-	-	6	6	17	25	28		
Permanent Personnel									
of Secondary Education (SE)	-	-	1	4	6	6	6		
Permanent Personnel									
of Compulsory Education (CE)	-	-	-	-	-	1	1		
Personnel under Secondment	1	1	2	6	6	4	3		
Available Personnel	12	13	1	2	2	2	0		
Seasonal Personnel							34		
Working Group Members <sup>2</sup>	4	4	12	20	19	20	20		
TOTAL	17	18	48	78	110	131	160		

<sup>&</sup>lt;sup>2</sup> Collaborating Associates in Work Groups.







and economists. The percentage allocation per specialty is shown in Chart 89.

EETT, in order to meet the rather increased needs in personnel in view of the Olympics and Paralympics, employed in May 2004, through a tender, temporal personnel of various specialties. This personnel stood at 40 people, who supported EETT's work with fine results.

In parallel, EETT took the necessary actions for its recruitment with permanent personnel, suitably qualified and capable of meeting the high requirements arising from its work. More specifically, in 2004 33 permanent personnel positions and 10 expert positions of various specialties were announced. As a result of the aforementioned actions, the permanent personnel is expected to increase by 41% in 2005.

EETT, in order to evaluate its working environment, made a research in June 2004 in relation to the employees' views about the internal operation and infrastructure. The research was made with the use of a structured questionnaire which, among others, included the following sections: procedures, working environment, communication/ information and training/ education issues, satisfaction from work, etc. Response to the research was particularly satisfactory, since 85% of the employees participated. The results led to the identification of those areas that required improvement and contributed to the planning of actions.

One of the most significant actions for the upgrading of the working environment was the announcement of a tender in November 2004 for the evaluation and upgrading of existing human resources administration-management systems and the support of their operation. The completion of the tender and the implementation of the project are expected in 2005.

#### 8.2. EETT Management Plan 2003 - 2007

During 2004, EETT implemented its Annual Management Plan, as shaped in the framework of its strategic planning for 2003-2004, aiming at the improvement of its efficiency to the benefit of consumers and the telecommunications and postal market.

In 2004 the strategic directions set by EETT were adjusted, to the extent required, to the developments or any changes which arose in the two markets and the EETT internal environment, as well as to the experience gained from the first year of implementation of the Management Plan.

More specifically, the main factors to be taken into account in the adaptation and reformation of the 2004 Plan were the following:

- ➤ Increased requirements arisen from the organization of the Olympic Games.
- Enhancement of EETT's supervisory role.
- Strengthening of the consumer's position in relation to developments in the two markets.
- ➤ The preparation of critical projects for the market of telecommunications services, that were strictly scheduled and highly demanding in human resources, such as the implementation of Number Portability, the creation of a Registry for Domain Names with a [.gr] suffix, the implementation of OTE cost accounting control, market analysis and competition evaluation.
- The implementation of the National Spectrum Management and Monitoring System (NSMMS) project.
- ➤ The promotion of broadband networks and services in the market.
- The publication of the new Law on postal services and the expansion of EETT's competences in this specific area.
- ➤ The delay in the harmonization of the new regulatory framework on telecommunications in

Greek Law.

- The establishment of EETT's first Regional Office in Thessaloniki and the need for decentralization of spectrum monitoring activities.
- ➤ The organization of EETT's internal operation according to its Organizational Chart.
- > EETT's recruitment with new personnel.

In this context, new goals were set, action plans were prepared and projects were specified to their achievement. Also, performance indices were set, whose development is closely monitored.

Moreover, in December 2004 EETT began its strategic planning for the years 2005 - 2007. The Management Plan for 2005 will evaluate the existing situation of the telecommunications and postal market and specify improvement policies, together with priorities and actions on issues such as information and protection of consumers, improved level of competition per service, promotion of alternative infrastructures, reviewing of rules for licensing, promotion of EETT's work and strengthening of its position at national and European level.

#### Operational Plan "Information Society"

During 2004, EETT continued the implementation of its projects subject to the OP IS of the 3<sup>rd</sup> Community Support Framework (3<sup>rd</sup> CSF). These are 9 projects under the EETT Management Plan for 2003 - 2007, which consist of 13 sub-projects. 9 of the sub-projects have already been completed (3 already in 2004), 1 is at the stage of re-announcement of tender and 3 are about to be completed during the first six-month period of 2005. Also, the Managing Authority of the IS processes the application of EETT for one more project.

In 2004 6 subprojects were in the process of implementation and were completed in their majority according to the schedules provided. The percentage of project completion, as at the end of 2004, is shown in the following Table.

Table 31  Projects included in the Operational Program "Information Society" under the 3 <sup>rd</sup> CSF  Project/ Sub-project	Completion Percentage
Depiction of the Postal Market  > Quality Measurement of the Universal Postal Service	86%
EETT Network Infrastructure and Equipment  Procurement of EETT Network Equipment	90%
National Spectrum Management and Monitoring System (NSMMS), Phase A  National Spectrum Management System and Monitoring Stations for the Prefectures of Attica and Thessaloniki	96%
Organization, Design and Application Study for the Voluntary Accreditation of Certification Service Providers (CSP) and other issues related to the Electronic Signature Certification Service Provision	100%
Organization Study and Application of the Radio Frequency Spectrum Division	100%
Integrated Information System (IIS) of EETT  IIS Specialization Study	100%

## 8.3. Information Technology Infrastructure

The EETT local network includes 8 central servers, approximately 200 workstations and 70 printers. The activities of EETT supported by software applications are the following: Management of the Telecommunications and Postal licensed companies Registry, NSMMS, Consumers Service System, presentation of telephony tariffs on EETT's website, management of complaints concerning the spectrum, market data analysis, management of contacts, recruitment management, fixed asset management, financial management, payroll, electronic protocol, security systems for access control to EETT premises and EETT's Intranet.

## 8.3.1. Support of Administrative Units with Software Applications

The telecommunication market monitoring by EETT lies in the collection and analysis of data related to the infrastructure, activities and financial status of providers. The primary source of data is questionnaires sent by EETT to be filled in by telecommunications providers. The volume of data is

large and their processing is highly demanding.

In 2004, in order to facilitate the monitoring of that market, an information system was developed, which allows the automation of the collection, storage and analysis of market data. In the new system, the enduser has access to data with modern software data analysis tools, which offer an aggregated or detailed presentation of data, enable calculation of indicators (e. g. market shares) and assist the creation of charts and graphs. At the same time, the possibility is offered to monitor the progress of figures and indicators in time.

In 2004 a software application was developed especially for the support of the Olympic Games, aiming at the efficient use of the radio frequency spectrum. More specifically, supporting software for intermodulation studies was developed for the procedure of radio frequency assignment of the land mobile service. Moreover, a special application was designed and implemented for the immediate (real time) forwarding of the description of problems submitted to the Technology Operating Centre (TOC), accommodated at the offices of the Athens Organizational Committee (ATHOC) Athens 2004, to the National Control Centre at EETT premises.

In parallel to the development of new applications, the existing EETT applications were upgraded in 2004, aiming at improving its relevant operations and increasing user-friendliness. We indicatively mention the following:

- The application "Postal licensed Companies Registry" was adapted to the new Legislative and Regulatory Framework governing the market of postal services.
- ➤ The Consumers Service System application was improved, enabling automated monitoring and processing of requests/ complaints by the Consumer Service Sector (CSS).

## 8.3.2. Automated Internal Procedures – Integrated Information System

In order to further improve and automate the internal operations, EETT held a tender for the implementation of the IIS, which was cancelled due to lack of competition in the tendering process. Due to the importance of the project, it was decided a new tender to be announced. Following the updating of the tender requirements, a new Tender Document was prepared, which was put for Public Consultation in December 2004. The Invitation to Tender was scheduled for early 2005. The main IIS goals are:

- Upgrade the services provided by EETT to the market and the consumers in relation to the quality of service, information and operational cost.
- Improve the productivity and efficiency of personnel in terms of quality and speed in the completion of daily tasks, as well as more effective management and exploitation of human resources.
- Upgrade the EETT information mechanisms with standardization, simplification and organization of information flow.
- ➤ Enhance the prospects for horizontal collaboration among EETT's administrative units.

In parallel to the aforementioned tender, EETT prepared a special project for modeling the business processes related to document flow with the use of widely accepted modeling methods.

#### 8.3.3. User Support

### Information Technology Performance Measurement System

Particular emphasis was placed in the quality of services provided to users of EETT information systems during 2004. In this context, an Information Technology (IT), Performance Measurement System was designed and implemented, with the following goals:

- Identification and measurement of performance indicators of IT services.
- Evaluation of the automation of procedures and the IT contribution to the increase of productivity.
- Evaluation of quality of information provided by IT systems to the Management, the employees and the public.
- Action planning in order to improve the quality of IT services.

The performance measurement system was based on:

- Research made through a questionnaire which recorded the satisfaction of employees in terms of EETT's information infrastructure.
- ➤ The identification of objectively measurable indicators (such as average response time to users' requests, average fault restoration time, etc.) and the implementation of measurement software.

#### **Security Policy of the EETT Network**

In the context of achieving a higher quality level for computerized services, a number of actions was designed and implemented, aiming at increasing the security of EETT's information systems and network. More specifically:

- ➤ The users' access policy to the network and systems was revised.
- A central distribution system of the security software was created.
- Security of the network equipment and central systems of EETT was enhanced.

➤ A software application was installed, assisting the monitoring of EETT of computer resources' use and informing system administrators about incidents, such as non-availability or excessive use of the hardware, in real time.

#### 8.3.4. Intranet

EETT's intranet, set in operation in 2003, was enriched with more information and upgraded in 2004. It constitutes a useful tool for the dissemination of information in EETT and for enhancing the communication among its members.

An indicative example of the intranet usage towards improving the support of personnel is the creation of a special web page containing Frequently Asked Questions (FAQ) concerning the use of hardware, software and network. This page assists users to resolve any problems they encounter without the intervention of the IT Department personnel.

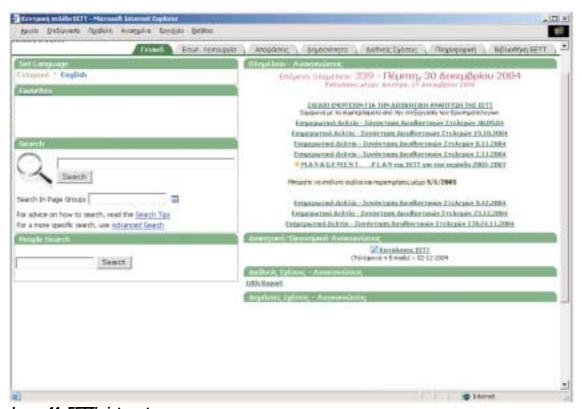


Image 11: EETT's intranet

#### 8.4. Website



Image 12: EETT's website

EETT's website (www.eett.gr) was enriched in 2004, especially regarding EETT actions to inform consumers. A new Section "Consumers" was created (see Section 2.1.) for the provision of information to consumers about their rights, obligations and options available, as well as the facilitation of the submission of enquiries/ complaints. This Section also includes a special presentation of fixed and mobile telephony tariffs (see subsection 2.2.6.).

Another new subsection of EETT's website is the "Social Responsibility of Companies", showing the social actions undertaken by telecommunications providers (see detailed presentation in page 194).

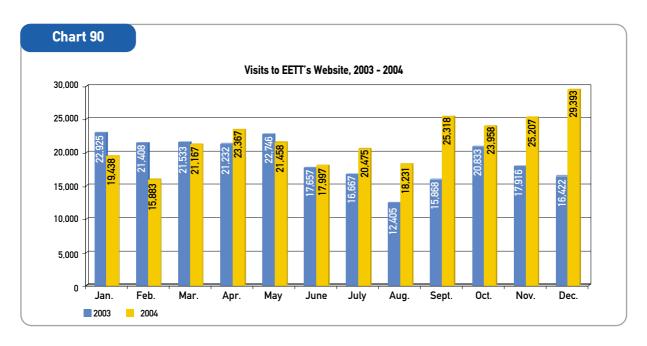
Other EETT actions which were supported by its web site are Public Consultations in relation to:

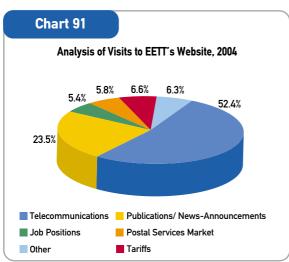
- The project of Domain Names Registry holding the [.gr] suffix.
- ➤ The assignment of Domain Names holding the [.gr]

- suffix with the use of non-Latin characters, and the existing assignment procedures.
- ➤ The operation and use of GSM-Gateways in the telecommunication market.
- ➤ The imposition of regulatory obligations in the market of call termination to mobile networks.
- ➤ The use of W-LAN technology for the provision of services to the public in Greece.
- The arising problems and/ or issues of Carrier pre-selection in the market.

The efficiency of EETT's website is demonstrated by the number of visits, which exceeded 260,000 showing an increase of about 30% compared to 2003. Chart 90 shows the extent of visits compared to 2003 on a monthly basis.

Chart 91 shows an analysis of visits to the Sections of the website. The highest number of visits, as was the case in previous years, was demonstrated in the

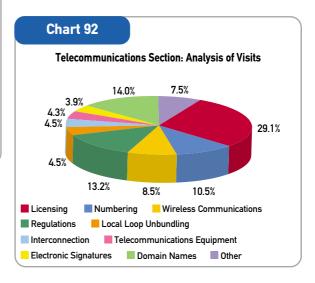




Sections of "Telecommunications" and "Publications". It is worth noting the visits to the website Sections presenting fixed and mobile telephony tariffs. It should be noted that even though these sites were released in April 2004, the extent of visits stood at 6.6% of the total website traffic.

Chart 92 presents the visits to the Telecommunications subsections which attracted most of the public interest. The Licensing subsection demonstrated the highest number of visits, as in previous years. Also, the Domain

Names holding the [.gr] suffix attracted a significant number of visits, mainly due to the changes made to the relevant regulatory framework, but also due to the publication of Registrants details.



#### **Presentation of Telephony Tariffs**

EETT's website enables the comparative presentation of the tariffs for fixed and mobile telephony (Section Consumers/ Presentation of Telephony Tariffs). The updating of the website is ongoing and depends on

the changes to the providers' tariffs. The aim is to provide sufficient and valid information to consumers, given the large number of providers operating in the market and the accordingly large number of offered tariff plans.

Through the website, EETT aims at providing ongoing information to consumers about issues concerning the selection and use of telecommunications services, emphasizing on fixed and mobile telephony.

The presented tariffs (see subsection 2.2.6.) are only related to domestic users, while comparison is made separately for the mobile and fixed telephony.

#### Social Responsibility of Telecommunications Providers

The actions composing the social profile of telecommunications providers are hosted on EETT's website as of March 2004, in a special Section, under the title "Social Responsibility of Companies".

This subsection presents in detail the initiatives of providers in telecommunications, which extend beyond their core business activities and aim at their contribution to society and the promotion of culture. More specifically, the actions related to the following fields of social activity are presented:

- Health (blood donation, measurements of electromagnetic radiation, etc.).
- Environment (recycling, energy saving programs, etc.)
- Science (sponsorships to research programs, organization of conferences, awards to scientific research, etc.).
- Education (scholarships, sponsorships to educational conferences, etc.).
- Child (e.g. financial support to associations-clubs for children).
- Special Social Groups (e.g. special programs for disabled persons).
- Culture (sponsorships to fairs, festivals, performances, etc.).
- > Sports (sponsorships to athletes and sports events).
- Local Community (financial support to schools in isolated areas, sponsorships for cultural events in the Greek region, etc.).
- Society and Economy (volunteer programs, contribution to the financial growth of Greece).

EETT's goal, through the promotion of social activities, is to motivate the providers, so that the subsection of "Social Responsibility of Companies" is continuously enriched with new initiatives reflecting the human-oriented character of the telecommunications sector.

#### 8.5. Financial Statements

BALANCE SHEE	ENIC T	TELECON DECEMBER 2004	<b>VI M L</b> - 10 <sup>th</sup> OF	JNICAT	TIONS RIOD (1 <sup>st</sup> JAN	& PO	ST COMMISSIOI DECEMBER 2004) (AMOUNTS IN EU	ROS)	
ASSETS	Amo	ounts for the Period e	ended 200	4 Amoun	ts for the Perio	od ended 2003	CAPITAL & LIABILITIES A. OWNERS' EQUITY	Amounts for the Period gended 2004	Amounts for the Period ended 2003
	<b>Acquisition Value</b>	Depreciation Undepre	ciated Value	Acquisition Value	Depreciation I	Depreciated Value	IV. Reserves		
<ol> <li>Establishment &amp; first installation expenses</li> <li>Other installation expenses (PC software)</li> </ol>	465,538.60 1,994,739.39		0,567.37 9,212.38	6,876.60 1,715,058.25	662.80 115,137,44	6,213.80 1,599,920,81	Charter Stipulated Reserves     Special reserves	293,470.29 15,430.67	293,470.29 15,430.67
4. Other installation expenses (PC soltware)	2,460,277.99		9,779.75	1,721,934.85	115,137,44	1,606,134.61	3. Special reserves	308,900.96	308,900,96
C. FIXED ASSETS				-1			V. Results carried forward		
II. Tangible Fixed Assets	110 117 00	07.440.00	4 077 40	447.047.00	00 400 50	05 400 44	Profit carried forward	186,029,269.76	
Transportation Equipment     Furniture & other equipment	149,117.69 11,112,980.34		1,977.43 5,669.83	147,317.69 3,799,991.68	82,129.58 982,562.59	65,188.11 2,817,429.09	Payments to be accounted from YME Res (Law 2867/2000 article 13 paragraph 8)		1,853,179.21
7. Fixed Assets under Construction	11,112,300.54	2,007,010.01 0,420	3,003.00	0,799,991.00	302,302.33	2,017,429.09	(Law 2007/2000 article 13 paragraph 6)	102,747,002.02	101,177,074.50
& Down payment	164,530.80		4,530.80	1,818,767.40	0.00	1,818,767.40	Total Equity (AIV+AV)	183,056,583.58	161,486,575.86
Total Tangible Assets (C II) III, Participations & other long-term	11,426,628.83	2,784,450.77 8,642	2,178.06	5,766,076.77	1,064,692.17	4,701,384.60	C. LIABILITIES		
financial assets							II. Current Liabilities		
7. Other long-term claims			5,117.00			199,753.79	1. Suppliers	4,409,672.88	777,597.65
Total Fixed Assets (C II+C III)		8,807	7,295.06			4,901,138.39	Customers down payments     Tax & duties payable	40,134.52 205,211.72	164,843.75 170,664.08
D. CURRENT ASSETS							Insurance & pension funds dues	179,899,90	119,038,68
I. Stock							11. Sundry creditors	28,153.71	8,208.48
<ol><li>Fixed assets parts</li></ol>		277	7,540.00			0.00	T-4-11 (-1-194 (O.10)	4 000 070 70	4 040 050 04
II. Receivables							Total Liabilities (C II)	4,863,072.73	1,240,352.64
1. Customers			5,206.97			440,325.23			
11. Sundry debtors			5,240.05			1,371,102.81			
IV. Cash		3,620	0,447.02			1,811,428.04			
Cash on hand		2	2,377.61			897.81			
2. Time & Sight deposits			5,683.46			153,132,246.76			
Total current assets (DI+DII+DIV)			3,061.07			153,133,144.57			
Total Guiterit assets (DITDH+DIV)		1/0,/36	5,048.09		=	154,944,572.61	D. TRANSIT CREDIT BALANCES		
E. TRANSIT DEBIT BALANCES							Unearned & deferred income	2,754,206.34	
Prepaid expenses			9,126.22			1,583.14	2. Accrued expenses	7,848.40	51,005.52
Non-current receivables from currently ea	arned income		9,461.93 3,588.15		-	2,660,821.58 2.662.404.72		2,762,054.74	1,387,321.83
			,,000,10		=		TOTAL OWNERS EQUITY & LIABILITIES		
TOTAL ASSETS (B+C+D+E)		190,681	1,711.05		-	164,114,250.33	(A+C+D)	190,681,711.05	164,114,250.33
DEBIT MEMO ACCOUNTS							CREDIT MEMO ACCOUNTS		
Debit balances of guarantees							Credit balances of guarantees		
& collateral security			1,636.18			27,396,286.99	& collateral	27,541,636.18	
			7,354.73			157.625.077.22	Other memo accounts	145,987,354.73	157,625,077.22 185,021,364.21
Other debit memo accounts  NOTE: 1. Balance sheet account "Sundry debit persons due to violations of the applicable legis down in the Public Revenue Collection Code an amounts of those penalties have been entered in	slation during this id shall be register under credit trans	eivables standing at € 2,7 year as well as previous y red under the respective re sit account "Unearned & D	years, and s evenues of Deferred inco	shall be collected w the periods to be co ome".	eans of EETT dec rith the procedure ollected. The resp	laid ective			
NOTE: 1. Balance sheet account "Sundry debt persons due to violations of the applicable legis down in the Public Revenue Collection Code an	slation during this id shall be register under credit trans	eivables standing at € 2,7 year as well as previous y red under the respective re sit account "Unearned & D D 31st DECEMBER 20	54,206.34 fi years, and s evenues of Deferred inco	shall be collected with the periods to be coome".	eans of EETT deceive the procedure of the procedure of the respondence	cisions to liable laid ective	APPROPRIATION A		
NOTE: 1. Balance sheet account "Sundry debt persons due to violations of the applicable legis down in the Public Revenue Collection Code an amounts of those penalties have been entered:  INCOME STATEMENT FOR TH.  I. OPERATING RESULTS  Turnover (collected duties)	slation during this id shall be register under credit trans	beivables standing at € 2.7, year as well as previous year dunder the respective resit account "Unearned & D  D 31st DECEMBER 20  unts for the Year end- 32,234	54,206.34 fi years, and sevenues of Deferred incompart of the sevenues of the sevenues of the sevenues of the sevenue of the s	shall be collected with the periods to be coome".	eans of EETT dec rith the procedure ollected. The resp	cisions to liable laid ective  04)  0us Year 2003 26,981,564.61	APPROPRIATION A	CCOUNT  Amounts for the Year A	emounts for the Previous
NOTE: 1. Balance sheet account "Sundry debt persons due to violations of the applicable legis down in the Public Revenue Collection Code an amounts of those penalties have been entered to INCOME STATEMENT FOR TH.  I. OPERATING RESULTS Turnover (collected duties) Less: Cost of services	slation during this id shall be register under credit trans	relvables standing at € 2,7 year as well as previous y red under the respective re it account "Unearned & D  D 31st DECEMBER 20 unts for the Year end- 31,882 11,882	54,206.34 fi years, and sevenues of operation of the property	shall be collected with the periods to be coome".	eans of EETT deceive the procedure of the procedure of the respondence	cisions to liable laid ective  04)  04)  0us Year 2003  26,981,564,61  8,782,156,15		CCOUNT  Amounts for the Year A ended 2004	rnounts for the Previous Year ended 2003
NOTE: 1. Balance sheet account "Sundry debt persons due to violations of the applicable legis down in the Public Revenue Collection Code an amounts of those penalties have been entered in INCOME STATEMENT FOR TH.  I. OPERATING RESULTS Turnover (collected duties) Less: Cost of services Gross results Plus: Other operating income	slation during this id shall be register under credit trans	evivables standing at € 2,7 year as well as previous yed under the respective reit account "Unearned & D  31st DECEMBER 20 unts for the Year end 32,234 11.882 20,357 1,288	54,206.34 fi years, and sevenues of perend incomplete i	shall be collected with the periods to be coome".	eans of EETT decirith the procedure ollected. The respondence of the r	Disions to liable laid eective  D4)  Dus Year 2003 26,981,564.61 8,782,156.15 8,189,408.46 4,735,004.98	Net profits for the year	Amounts for the Year A ended 2004 22,998,415.65	mounts for the Previous Year ended 2003 25,024,608.99
NOTE: 1. Balance sheet account "Sundry debt persons due to violations of the applicable legis down in the Public Revenue Collection Code an amounts of those penalties have been entered in INCOME STATEMENT FOR TH.  I. OPERATING RESULTS Turnover (collected duties) Less: Cost of services Gross results Plus: Other operating income Total	slation during this id shall be register under credit trans	evivables standing at € 2.7 year as well as previous y red under the respective r it account "Unearned & D D 31st DECEMBER 20 Junts for the Year end 2.234 11.882 20.351 1.288 2 1.634	254,206.34 fi years, and sevenues of operered incomparts of the control of the co	shall be collected with the periods to be coome".	eans of EETT decirith the procedure ollected. The respondence of the r	Discisions to liable laid ective  D4)  D98 Year 2003 26,981,564.61 8,782,156.15 18,199,408.46 4,735,004.98 22,934,413.44	Net profits for the year Profits brought forward	Amounts for the Year Pended 2004 22,998,415.65 163,030,854.11	rnounts for the Previous Year ended 2003 25,024,608.99 138,006,245.12
NOTE: 1. Balance sheet account "Sundry debt persons due to violations of the applicable legis down in the Public Revenue Collection Code an amounts of those penalties have been entered in INCOME STATEMENT FOR TH.  I. OPERATING RESULTS Turnover (collected duties) Less: Cost of services Gross results Plus: Other operating income	slation during this id shall be register under credit trans	evivables standing at € 2.7 year as well as previous yed under the respective reit account "Unearned & D  D 31st DECEMBER 20 unts for the Year end 32.234 11.882 20.357 1.282 21.632 2.388	54,206.34 fi years, and sevenues of perend incomplete i	shall be collected with the periods to be coome".	eans of EETT decirith the procedure ollected. The respondence of the Previous State of t	Disions to liable laid ective  D4)  Dus Year 2003 26,981,564.61 8,782,156.15 8,189,408.46 4,735,004.98	Net profits for the year	Amounts for the Year A ended 2004 22,998,415.65	rnounts for the Previous Year ended 2003 25,024,608.99 138,006,245.12
NOTE: 1. Balance sheet account "Sundry debt persons due to violations of the applicable legis down in the Public Revenue Collection Code an amounts of those penalties have been entered to the control of the Public Revenue Collection Code an amounts of those penalties have been entered to INCOME STATEMENT FOR THE LOWER THOSE TO THE TOWN THE COLLECT OF THE TOWN THE PUBLIC REVENUE STATEMENT OF THE TOWN THE TOWN THE PUBLIC REVENUE TO THE TOWN T	slation during this id shall be register under credit trans IE YEAR ENDE!	evivables standing at € 2.7 year as well as previous y red under the respective r at account "Unearned & D 31st DECEMBER 20 units for the Year end 32.234 11.882 20.357 1.288 21.633 19.244 3,606,380.24	54,206.34 fi years, and sevenues of the perred income of the second of t	shall be collected with the periods to be coome".	eans of EETT de with the procedurer collected. The resp DECEMBER 200 s for the Previo	Day Year 2003 26,981,564.61 8,782,156.15 18,199,408.46 4,735,004.98 22,934,413.44 1,610,430.01 21,323,983.43	Net profits for the year Profits brought forward Profit for appropriation	Amounts for the Year Amounts f	recursts for the Previous Year ended 2003 25,024,608.99 138,006,245.12 163,030,854,11
NOTE: 1. Balance sheet account "Sundry debt persons due to violations of the applicable legis down in the Public Revenue Collection Code an amounts of those penalties have been entered in INCOME STATEMENT FOR TH.  I. OPERATING RESULTS Turnover (collected duties) Less: Cost of services Gross results Plus: Other operating income Total Less: 1. Administrative expenses Partial operating results Plus: 4. Credit interest & related income Less: 3. Debt interest & related expenses	slation during this id shall be register under credit trans IE YEAR ENDE!	veivables standing at € 2.7 year as well as previous y red under the respective r it account "Unearmed & D D 31st DECEMBER 20 unts for the Year end 32.23 11.882 20.351 1.283 2.362 3.606.380.24 2.346.66 3.606.380.24	54,206.34 fi years, and sevenues of beferred income the sevenues of the sevenu	shall be collected with the periods to be coome".	eans of EETT decirith the procedure ollected. The respondence of the Previous State of t	Dus Year 2003 26,981,564.61 8,782,156.15 18,199,408.46 4,735,004.98 22,934,413.44 1,610,430.01 21,323,983.43 3,680,445.13	Net profits for the year Profits brought forward	Amounts for the Year Amounts f	mounts for the Previous Year ended 2003 25,024,608.99 138,006,245.12 163,030,854.11
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NOTE: 1. Balance sheet account "Sundry debt persons due to violations of the applicable legis down in the Public Revenue Collection Code an amounts of those penalties have been entered in INCOME STATEMENT FOR TH.  I. OPERATING RESULTS Turmover (collected duties) Less: Cost of services Gross results Plus: Other operating income Total Less: 1. Administrative expenses Partial operating results Plus: 4. Credit interest & related income Less: 3. Debit interest & related expenses Total operating results I. PLUS: EXTRAORDINIARY RESULTS	slation during this dishall be register under credit trans	eivables standing at € 2.7 year as well as previous y red under the respective r it account "Unearmed 8.D  D 31st DECEMBER 20 unts for the Year end 32.23 11.882 20.351 12.882 21.633 19.245 3,606,380.24 2.346.66 3.604 22.848	54,206.34 fi years, and sevenues of beferred income the sevenues of the sevenu	shall be collected with the periods to be coome".	eans of EETT dee with the procedure/liberted. The resp ECEMBER 200 \$ for the Previous  3.684,961.99 4,516.86  20.425.99 0.00	Dus Year 2003 26,981,564.61 8,782,156.15 18,199,408.46 4,735,004.98 22,934,413.44 1,610,430.01 21,323,983.43 3,680,445.13	Net profits for the year Profits brought forward Profit for appropriation	Amounts for the Year Amounts f	mounts for the Previous Year ended 2003 25,024,608.99 138,006,245.12 163,030,854.11
NOTE: 1. Balance sheet account "Sundry debt persons due to violations of the applicable legis down in the Public Revenue Collection Code an amounts of those penalties have been entered:  INCOME STATEMENT FOR TH  I. OPERATING RESULTS  Turnover (collected duties) Less: Cost of services Gross results Plus: Other operating income Total Less: 1. Administrative expenses Partial operating results Plus: 4. Credit interest & related income Less: 3. Debit interest & related expenses Total operating results II. PLUS: EXTRAORIDINARY RESULTS  1. Extraordinary & non-operating ir	slation during this daysall be register under credit trans	evivables standing at € 2.7 year as well as previous y red under the respective r it account "Unearned & D  31st DECEMBER 20 unts for the Year end 32.23 11.883 20.351 1.283 2.388 19.244 2.346.66 3.606.380.24 2.346.66 3.606.22,848	54,206.34 fi years, and sevenues of beferred income the sevenues of the sevenu	shall be collected with the periods to be coome".	eans of EETT de rith the procedure ollected. The resp ECEMBER 200 s for the Previous 3,684,961,99 4,516,86	Dus Year 2003 26,981,564.61 8,782,156.15 18,199,408.46 4,735,004.98 22,934,413.44 1,610,430.01 21,323,983.43 3,680,445.13	Net profits for the year Profits brought forward Profit for appropriation	Amounts for the Year Amounts f	mounts for the Previous Year ended 2003 25,024,608.99 138,006,245.12 163,030,854.11
NOTE: 1. Balance sheet account "Sundry debt persons due to violations of the applicable legis down in the Public Revenue Collection Code an amounts of those penalties have been entered in INCOME STATEMENT FOR TH.  I. OPERATING RESULTS Turnover (collected duties) Less: Cost of services Gross results Plus: Other operating income Total Less: 1. Administrative expenses Partial operating results Plus: 4. Credit interest & related expenses Total operating results II. PLUS: EXTRAORDINARY RESULTS 1. Extraordinary & non-operating in a. Prior period income Less: 1. Extraordinary & non-operating exp 3. Prior period expenses	slation during this daysall be register under credit trans	eviables standing at € 2.7 year as well as previous y red under the respective r it account "Unearmed & D  31st DECEMBER 20 unts for the Year end 32.23 1.882 2.035 1.282 2.360 2.380.24 2.346.66 3.600 22.845 149.886.46 70.23 149.956.69 781.35 148	54,206,34 fi years, and sevenues of obeferred inco obe	shall be collected withe periods to be come.  NUARY - 31st D  Amounts	eans of EETT dee with the procedure/liberted. The resp ECEMBER 200 \$ for the Previous  3.684,961.99 4,516.86  20.425.99 0.00	Dus Year 2003 26,981,564.61 8,782,165.18,199,408.46 4,735,004.98 22,934,413.44 1,610,430.01 21,323,983.01 25,004,428.56	Net profits for the year Profits brought forward Profit for appropriation	Amounts for the Year Amounts f	mounts for the Previous Year ended 2003 25,024,608.99 138,006,245.12 163,030,854.11
NOTE: 1. Balance sheet account "Sundry debt persons due to viciations of the applicable legis down in the Public Revenue Collection Code an amounts of those penalties have been entered in INCOME STATEMENT FOR THE INCOME STATEMENT FOR THE INCOME COLLECT OF THE INCOME STATEMENT FOR THE INCOME STAT	slation during this dishall be register under credit trans  E YEAR ENDE!  Amod	elviables standing at € 2.7 year as well as previous y red under the respective r it account "Unearned & D  D 31st DECEMBER 20 32.23 11.882 20.351 1.282 21.634 2.346.66 3.604 2.346.66 3.604 149.886.46 70.23 149.956.69 781.35 148 22.998	54,206,34 fi years, and sevenues of beferred incomments of the sevenues of the	shall be collected with periods to be come.  NUARY - 31st D  Amounts	eans of EETT decirith the procedure with the procedure procedure of the responsibility of the Previous store the Previous 3,684,961.99 4,516,86 20,425,99 20,425,99 245,56	D4) Dus Year 2003 26,981,564.61 8,782,156.15 8,199,408.46 4,735,004,98 22,934,413,001 21,323,983.43 3,680,445.13 25,004,428.56	Net profits for the year Profits brought forward Profit for appropriation	Amounts for the Year Amounts f	mounts for the Previous Year ended 2003 25,024,608.99 138,006,245.12 163,030,854.11
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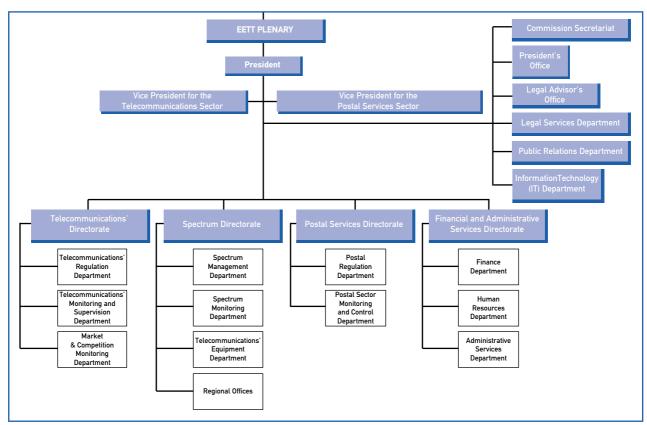


Figure 3: EETT Organizational Chart

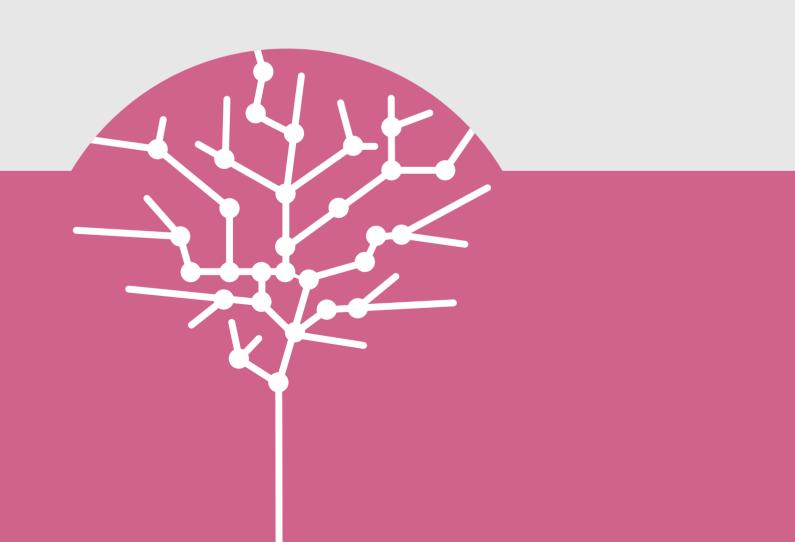
#### 8.6. Goals

As regards the internal operation and information support of EETT, the following goals have been set:

- Increase of efficiency in the internal organization and operation of EETT, by meeting its needs in human resources and operating a modern and effective human resources management system.
- Enhancement of the information support to EETT administrative units with the development of new and further improvement of existing software applications.
- Transition to an integrated IT infrastructure for EETT and the introduction of a digital culture with the implementation of the IIS.
- Upgrading of the EETT website, in order to be more user-friendly.
- Further impovement of quality of services provided to the users of EETT's Information Systems.
- Purchase of property to host EETT premises.



### **APPENDICES**



#### APPENDIX I.

## Greek Legislative – Regulatory Framework (as in force on 31 December 2004)

#### Laws

- "Organization and operation of telecommunications and other provisions" (Repeal of Law 2246), Law 2867, GG Issue 273/A/19-12-2000.
- "On the Organization and Operation of the Greek Telecommunications Organization S.A. (OTE)", Law 2257, GG Issue 197/A/23-11-1994.
- "Regulation of matters regarding Organizations and Services of the Ministry of Transportation and Communications and other provisions", Law 2366, GG Issue 256/A/12-12-1995.
- "Listing of Shares of the Greek Telecommunications Organization S.A. (OTE) in the Athens Stock Exchange (ASE) and other provisions", Law 2374, GG Issue 32/A/29-02-1996.
- "Legal status of private television and local radio, regulation of matters regarding the radio television market and other provisions", Law 2328, GG Issue 159/A/03-08-1995.
- "Matters under the competence of the Ministry of Transportation and Communications" (Amendment to Law 2246), Law 2465, GG Issue 28/A/26-02-1997.
- "Structure and operation of the telecommunications market", Law 2578, GG Issue 30/A/17-02-1998, article 12.
- "Regulation of matters under the competence of the Ministry of Transportation and Communications and other provisions" (Amendment to Law 2246), Law 2801, GG Issue 46/A/03-03-2000.
- 9. "Organization and operation of the telecommunications sector", Law 2246, GG Issue 172/A/20-10-1994
- "Organization and operation of public transportation by buses, technical vehicles control and land transport safety and other provisions" (Amendment of Law 2867), Law 2963, GG Issue 268/A/23-11-2001.
- 11. "Incorporation of a société anonyme banking company under the business name "Hellenic Postal

- Savings Bank S.A." and other provisions" (Amendment of Law 2867), Law 3082, GG Issue 316/A/16-12-2002.
- 12. "Amendment of Law 2668/1998 (GG Issue 282/A/18-12-1998), Harmonization with Directive 2002/39/EC, Regulations of Hellenic Post Organization (ELTA) and other provisions" Law 3185, GG Issue 229/A/2003.

#### Presidential Decrees

- PD 40/1996 "Open network provision in Leased Lines, in adaptation to Directive 1992/44/EEC as amended by Decision 1994/439/EC", GG Issue 27/A/22-02-1996.
- PD 212/1997 "On the harmonization of Greek Legislation to Directive 1994/46/EC", GG Issue 166/A/25-08-1997.
- PD 122/1998 "On the equipment of satellite earth stations, in compliance with Directive 1993/97/EC complementing Directive 1991/263/EEC", GG Issue 103/A/15-05-1998.
- 4. PD 156/1999 "On the Amendment of Law 2246/1994 (GG Issue 172/A/20-10-1994) and of PD 40/1996 (GG Issue 276/A/19-12-1996) in compliance with Directive 1997/51/EC of the European Parliament and of the Council amending Council Directives 1990/387/EEC and 1992/44/EEC, for the purpose of adaptation to a Competitive Environment in Telecommunications", GG Issue 153/A/ 29-07-1999.
- PD 157/1999 "Granting of General Authorizations and Individual Licences in the Sector of Telecommunications Services, in adaptation to Directive 1997/13/EC of the European Parliament and of the Council", GG Issue 153/A/29-07-1999.
- PD 165/1999 "On the amendment of Law 2246/1994, as in force each time, in compliance with (a) Directive 1997/33/EC on interconnection in

- Telecommunications, ensuring Universal Service and interoperability through application of the principles of Open Network Provision (ONP), and (b) Directive 1998/61/EC on the amendment of Directive 1997/33/EC". GG Issue 159/A/4-08-1999.
- PD 181/1999 "Adaptation to Directive 1998/10/EC on the implementation of Open Network Provision (ONP) on voice telephony and on Universal Service for telecommunications in a competitive environment", GG Issue 170/A/20-08-1999.
- PD 150/2001 "Adaptation to Directive 1999/93/EC of the European Parliament and of the Council on a Community framework for Electronic Signatures", GG Issue 125/A/25-06-2001.
- PD 342/2002 "Handling documents via electronic mail between public services, public law legal entities and Local Authorities or between these and persons or private law legal entities governed by private law and associations", GG Issue 284/A/22-11-2002.
- PD 343/2002 "Harmonization of Greek legislation to the provisions of Directive 1998/84/EC of the European Parliament and of the Council of 20 November 1998 on the legal protection of services based on, conditional access [subscription services] [Official Journal (OJ) L. 320/28-11-1998, p. 54)]", GG Issue 284/A/22-11-2002.

#### **Ministerial Decisions**

- MTC Decision 44 "Establishment of the National Telecommunications Commission (EETT)", GG Issue 29/B/19-01-1995.
- 2. MTC Decision 68142 "Regulation on Hearings", GG Issue 527/B/16-06-1995.
- 3. MTC Decision 68141 "Ethics Code for the Exercise of Telecommunications Activities", GG Issue 581/B/4-07-1995.
- MTC Decision 92093 "Granting-Assignment of Frequencies and Determination of OTE Individual Licence Fees". GG Issue 1101/B/29-12-1995.
- 5. MTC Decision 59 "Appointment of members and vice-chairmen to EETT", GG Issue 92/B/10-02-1999.

- Decision 58648/4946 of the Deputy Minister of Transportation and Communications - "Granting of additional GSM 900/ DCS1800 Mobile Telephony Licences", GG Issue 1280/B/20-10-2000.
- Decision 515/2001 of the Deputy Minister of Transportation and Communications - "Determination of public consultation procedure for granting Individual Licences under conditions limiting their number", GG Issue 177/B/21-02-2001.
- Decision 26997/1737/2001 of the Deputy Minister of Transportation and Communications - "Limitation of the Number and procedure for granting additional Individual Licences for the provision of 2G (GSM/DCS) mobile services", GG Issue 549/B/11-05-2001.
- Decision 26998/1738/2001 of the Deputy Minister of Transportation and Communications - "Limitation of the Number and procedure for granting Individual Licences for the provision of 3G (UMTS) mobile services", GG Issue 549/B/11-05-2001
- JMD 78870/14-12-2001 of the Ministers of Finance and of Transportation and Communications -"Regulation on the EETT conclusion of Agreements on Procurement, Services and Studies", GG Issue 1750/B/31-12-2001.
- MD 44465/2002 "Definition of legal form, minimum capital and minimum mandatory staffing of telecommunications companies", GG Issue 7/B/ 11-01-2002.
- 12. Ministerial Decision 36608/1026/2004 "Regulation on EETT hearings for postal services issues, and the definition of investigation type and procedure or other controlling actions by the same authority to ascertain violations under Law 2668/1998", GG Issue 970/B/29-06-2004.
- 13. Ministerial Decision 36809/1027/2004 "Regulation on the procedures for the processing of complaints by EETT and dispute resolution between the State and postal undertakings, between postal undertakings and between the latter and users", GG Issue 1083/B/16-07-2004.

 Ministerial Decision 36810/1028/2004, - "Regulation on the control and controlling procedure for securing the Universal Service Provider's (USP) exclusive rights ", GG Issue 1186/B/03-08-2004.

### EETT Regulatory Decisions pursuant to Law 2867/2000

- EETT Decision 205/6/2001 "EETT Recommendation regarding the public consultation procedure for granting Individual Licences under conditions limiting their number".
- EETT Decision 206/2/2001 "National Numbering Plan for Telephony Services and for Mobile and Personal Communications Services", GG Issue 127/B/8-02-2001.
- 3. EETT Decision 207/2/2001 "Regulation on Individual Licences", GG Issue 195/B/1-03-2001.
- 4. EETT Decision 207/3/2001 "Regulation on General Authorizations", GG Issue 195/B/1-03-2001.
- EETT Decision 218/38/2001 "Amendment of EETT Decisions 207/2/2-02-2001 ('Regulation on Individual Licences') and 207/3/2-02-2001 ('Regulation on General Authorizations')", GG Issue 689/B/1-06-2001.
- EETT Decision 207/6/2001 "Regulation on the Management and Allocation of Numbers under the National Numbering Plan for Telephony Services and for Mobile and Personal Communications Services", GG Issue 159/B/16-02-2001.
- EETT Decision 210/2/2001 "Regulation on the Assignment of Individual Radio Frequencies or Radio Frequency Bands, under Individual Licence Status, for provision of Public Telecommunication Services", GG Issue 285/B/19-03-2001.
- EETT Decision 211/3/2001 "Regulation on Costing and Pricing Principles", GG Issue 466/B/20-04-2001.
- EETT Decision 215/31/2001 "Regulation on the Management of Short Codes under the National Numbering Plan for Telephony Services and for Mobile and Personal Communications Services", GG Issue 644/B/28-05-2001.
- 10. EETT Decision 217/29/2001 "Reference Offer for Unbundled Access to the Local Loop of the Greek

- Telecommunications Organization S.A. (OTE), Part I: Fully Unbundled Access", GG Issue 751/B/15-06-2001.
- EETT Decision 218/36/2001 "Regulation on the Procedures, Terms and Conditions for Conclusion of National Roaming Agreements between Operators granted with Individual Licences for Installation, Operation or Exploitation of 2G and/or 3G Mobile Public Telecommunications Networks", GG Issue 735/B/13-06-2001.
- EETT Decision 227/86/2001 "Antenna Mast Construction not requiring a Licence, pursuant to article 1 of Law 2801/2000", GG Issue 1226/B/ 20-09-2001.
- 13. EETT Decision 228/23 "Amendment of EETT Decision 217/29/18-05- 2001 concerning the Reference Offer for Fully Unbundled Access to the Local Loop of the Greek Telecommunications Organization S.A. (OTE) GG Issue 751/B/2001", GG Issue 1261/B/28-09-2001.
- 14. EETT Decision 233/34/2001 of 22 October 2001 "Determination of the Basic Level for Itemised
  Billing of Users of Fixed Public Telephony
  Networks and/or Integrated Services Digital
  Networks (ISDN) and/ or Fixed Public Telephony
  Services, including Value Added Services, and of
  the Parties under Obligation to Provide such
  Billing", GG Issue 1501/B/8-11-2001.
- EETT Decision 236/79/2001 "Regulation on Licences for Land-based Antenna Mast Constructions", GG Issue 1649/B/11-12-2001.
- 16. EETT Decision 238/95/2001 "Reference Offer for Unbundled Access to the Local Loop of the Greek Telecommunications Organization S.A. (OTE) -Part II: Shared Access to the Local Loop", GG Issue 1781/B/31-12-2001.
- EETT Decision 238/96/2001 "Assignment of Radio Frequencies for Point-to-Point Links used, prior to the issuance of Ministerial Decision 62087/1998, by Public Telecommunications Services Providers", GG Issue 1773/B/31-12-2001.
- 18. EETT Decision 239/69/2001 "Amendment of MD 4829 GY/1992 'Granting of an Operating Licence

- for a GSM Cellular Telecommunications Network to 'STET HELLAS Telecommunications S.A.' (GG Issue 586/B/1992)", GG Issue 142/B/12-02- 2002.
- EETT Decision 240/1/28-12-2001 "Amendment of PD 437/1995 "Issue of Individual Licence for Installation, Development, Operation and Exploitation of Telecommunications Networks and for the Exercise of other Telecommunications Activities by the Greek Telecommunications Organization S.A. (OTE) (GG Issue 250/A/1995), to the extent concerning the Individual Licence for Provision of Personal Communications Services through the Personal Communications Network based on DCS Technology, which was transferred to the Société Anonyme under the business name 'COSMOTE -Mobile Communications S.A.', by article 15 of Law 2465/1997", GG Issue 142/B/12-02-2002.
- 20. EETT Decision 240/5/2002 "Dates for Commencement of the Third Stage in the Introduction of the National Numbering Plan", GG Issue 25/B/16-01-2002.
- 21. EETT Decision 240/13/2001 "Designation of Parties under Obligation to provide Universal Service", GG Issue 23/B/16-01-2002.
- EETT Decision 244/124/2002 of 1 February 2002 "Regulatory Provisions on Universal Service", GG Issue 188/B/20-02-2002.
- EETT Decision 247/63/2002 "Provisional Interconnection Tariffs for Call Termination to OTE Network for 2002", GG Issue 319/B/19-03-2002.
- 24. EETT Decision 248/57/2002 "Amendment of EETT Decision 215/31/2-5-2001 ('Regulation on the Management of Short Codes under the National Numbering Plan for Telephony Services and for Mobile and Personal Communications Services')", GG Issue 458/B/15-04-2002.
- 25. EETT Decision 248/64/2002 "Amendment of EETT Decision 229/26/14-09-2001 ('Amendment of PD 437/1995 'Issue of Individual Licence for Installation, Development, Operation and Exploitation of Telecommunications Networks and for the Exercise of other Telecommunications Activities by the Greek Telecommunications Organization S.A. [OTE]')", GG Issue 500/B/24-04-2002.

- EETT Decision 248/68/2002 "Designation of SMP Operators in the Market for Public Mobile Telephony Networks and Public Mobile Telephony Services", GG Issue 382/B/29-03-2002.
- 27. EETT Decision 248/71/2002 "Regulation on the Provision of Electronic Signature Certification Services". GG Issue 603/B/16-05-2002.
- 28. EETT Decision 249/115/2002 "Regulation on Hearings concerning Telecommunications Issues", GG Issue 642/B/23-05-2002.
- EETT Decision 251/77/2002 "Designation of SMP operators in the leased lines provision market GG Issue 527/B/29-04-2002.
- EETT Decision 253/87/2002 "Prices for Fully Unbundled and Shared Access to the Local Loop", GG Issue 720/B/13-06-2002.
- 31. EETT Decision 254/70/2002 "Regulation on the Introduction of Carrier Pre-selection in the Greek Market". GG Issue 773/B/21-06-2002.
- 32. EETT Decision 254/71/2002 "Regulation on the Introduction of Number Portability in the Greek Market", GG Issue 791/B/26-06-2002.
- EETT Decision 254/72/2002 "Regulation on the Assignment of Individual Radio Frequencies for Private Wireless Links", GG Issue 895/B/16-07-2002.
- EETT Decision 255/83/2002 "Regulation on the Definition of the Universal Service Content", GG Issue 874/B/12-07-2002.
- 35. EETT Decision 255/84/2002 "Regulation on issues related to the Provision of Leased Lines", GG Issue 810/B/28-06-2002.
- EETT Decision 261/143/2002 "Regulation on Universal Service Costing and Pricing Principles", GG Issue 1208/B/18-09-2002.
- EETT Decision 262/107/2002 "Special measures for protecting Monitoring Stations of the National Radio Spectrum Management and Monitoring System against harmful interference", GG Issue 1262/B/26-09-2002.
- 38. EETT Decision 264/140/2002 Designation of Parties under Obligation to provide Universal Service", GG Issue 789/B/24-10-2002.

- 39. EETT Decision 265/122/2002 "Determination of the use of numbers of the "696" series under the National Numbering Plan", GG Issue 1440/B/15-11-2002.
- 40. EETT Decision 266/92/2002 "Regulations concerning Short Codes under the National Numbering Plan", GG Issue 1440/B/15-11-2002.
- 41. EETT Decision 266/96/2002 "Publication of an EETT Declaration regarding OTE's Compliance with the Cost Accounting System approved by EETT for the Voice Telephony Services provided", GG Issue 1440/B/15-11- 2002.
- 42. EETT Decision 267/100/2002 "Determination of Short Code in connection with the Universal Service Obligation deriving from article 6, paragraph 8 of EETT Decision 255/83/14-6-2002 ('Determination of Universal Service Content')", GG Issue 1518/B/4-12-2002.
- 43. EETT Decision 267/123/2002 "Publication of an EETT Declaration regarding OTE's Compliance with the EETT - approved Cost Accounting System for the Interconnection Services provided -Adoption and Publication in the Government Gazette", GG Issue 1531/B/9-12-2002.
- 44. EETT Decision 268/77/2002 "Regulation on Management and Assignment of [.gr] Domain Names", GG Issue 1617/B/31-12-2002.
- 45. EETT Decision 268/77/2002 "Introduction of Part Circuits in the Greek Market", GG Issue 1604/B/ 30-12-2002.
- 46. EETT Decision 269/73/2002 "OTE Offer for Provision of Pre-agreed SLA Leased Line Services", GG Issue 17/B/14-01-2003.
- 47. EETT Decision 239/73/2003 "Regulation on Management of Directory Enquiries Services Shorth Codes" GG Issue 604/B/15-05-2003.
- 48. EETT Decision 276/40/2003 "Regulation on Management of Routing Numbers", GG Issue 604/B/15-05-2003.
- EETT Decision 276/41/2003 "Consumer Information on audiotext service fees and SMS of additional charge", GG Issue 595/ B/14-05-2003.
- 50. EETT Decision 277/63/2003 "Results of Cost

- Control on Tariffs of Fully Unbundled and Shared Access to OTE's Local Loop/ Publication of New Prices", GG Issue 331/B/20-03-2003.
- EETT Decision 277/64/2003 "Regulation on Control Procedures and Publication Obligations for Telecommunications Services or/ and Networks Providers Tariffs". GG Issue 514/B/2-05-2003.
- 52. EETT Decision 279/32/2003 "Regulation on the Designation of Notified Bodies according to PD 44/2002". GG Issue 441/B/14-04-2003.
- 53. EETT Decision 294/55/2003 "Regulation on the Publication of Technical Interfaces of Public Telecommunications Networks according to PD 44/2002", GG Issue 1590/B/30-10-2003.
- 54. EETT Decision 295/63/2003 "Regulation on Designation of Bodies to Ascertain Compliance of Secure Signature Creation Devices for Electronic Signature and of Secure Cryptographic Units and Bodies to Ascertain Compliance of Certification Services Providers with Voluntary Accreditation Criteria", GG Issue 1730/B/24-11-2003.
- 55. EETT Decision 295/64/2003 "Regulation on the Compliance Control of Secure Signature Creation Devices for Electronic Signature and of Secure Cryptographic Units", GG Issue 1730/B/24-11-2003.
- 56. EETT Decision 295/65/2003 "Regulation on Voluntary Accreditation of Certification Services Providers", GG Issue 1730/B/24-11-2003.
- 57. EETT Decision 296/49/2003 "Regulation on Radio Equipment Notification to EETT", GG Issue 1881/B/17-12-2003.
- 58. EETT Decision 296/93/2003 "Regulation on General Authorizations for Postal Services Provision", GG Issue 1682/B/14-11-2003.
- 59. EETT Decision 299/46/2003 "Results of OTE's 2003 Cost Control (with actual data of the year 2001) for the services under regulation", GG Issue 1925/B/24-12-2003.
- EETT Decision 300/44/2003 "Regulation on Individual Licences for Postal Services Provision", GG Issue 1906/B/22-12-2003.
- EETT Decision 300/47/2003 "Completion of OTE's 2003 Cost Control (with actual data of the year 2001)

- Approval of Final Results", GG Issue 1925/B/24-12-2003.
- 62. EETT Decision 301/28/2003 "Regulation on Definition of Objective Costing Methods applied to the Internal Accounting System of the Universal Service Provider", GG Issue 1993/B/31-12-2003.
- 63. EETT Decision 301/30/2003 "Decision on the Proposal of OTE concerning its New Pricing Policy for Fixed Voice Telephony" of the year 2003, GG Issue 1925/B/24-12-2003.
- 64. EETT Decision 302/11/2003 "Microcell Antenna Systems for which a licence is not required pursuant to article 1 of Law 2801/2000", GG Issue 91/B/23-01-2004.
- 65. EETT Decision 303/4 "Decision on the Wholesale Tariffs submitted by the Hellenic Telecommunications Organization S.A. (OTE), in accordance with articles VI, 2 and VII, 2 of the EETT Decision 301/30/15-12-2003", GG Issue 23/B/14-01-2004.
- 66. EETT Decision 304/34/2004 "Adoption of Modifications/ Ameliorative Guidelines in the OTE Costing System (Methodology FDC-HC, LRAIC-CC, Accounting Separation)", GG Issue 297/B/11-02-2004.
- EETT Decision 304/40/2004 "Extension to the Date of Commencement of the Domain Name System [.gr]", GG Issue 309/B/11-02-2004.
- 68. EETT Decision 305/37/2004 "Transaction cost for the fixed telephony number portability service", GG Issue 422/B/02-03-2004.
- 69. EETT Decision 305/38/2004 "Transaction cost for the mobile telephony number portability service", GG Issue 422/B/02-03-2004.
- EETT Decision 305/39/2004 "Updating Time Definition for the telecommunication providers routing tables in the context of the implementation of Number Portability in the Greek market", GG Issue 415/B/01-03-2004.
- 71. EETT Decision 306/8/2004 "Deletion of frequencies from the National Radio Frequencies Registry", GG Issue 601/B/23-04-2004.
- 72. EETT Decision 307/7/2004 "Short codes use of the 138 series of the National Numbering Plan for the Provision of Customer Services on Number Portability issues", GG Issue 817/B/02-06-2004.

- EETT Decision 308/37/2004 "Selection of technological solution for the implementation of the Voluntary Accreditation scheme", GG Issue 601/B/23-04-2004.
- 74. EETT Decision 308/43/2004 "Publication of EETT's statement relating to the compliance of OTE S.A. with the obligation of cost-oriented tariffing during 2003, based on Costing Systems control for access and use of the public switched telephone network and services (based on the FDC-HC Methodology) and Interconnection services (based on the LRAIC-CC Methodology)", GG Issue 894/B/16-06-2004.
- 75. EETT Decision 309/28/2004 "Procedure of radio frequency assignments to meet the needs of the Athens 2004 Olympic Games", GG Issue 1243/B/12-08-2004.
- 76. EETT Decision 309/48/2004 "Regulation on the definition of duties paid for actions on Domain Names holding the [.gr] suffix— Approval and publication in the Government Gazette", GG Issue 525/B/23-03-2004.
- 77. EETT Decision 310/15/2004 "Publication of the EETT Decision 310/15/17-03-2004 "Domain Name holding the [.gr] suffix assignment application template in the context of article 7 of the Management and Assignment Regulation on Domain Names holding the [.gr] suffix, (GG Issue 1617/B/2002)", GG Issue 666/B/10-05-2004.
- EETT Decision 310/16/2004 "Modification of EETT Decision 268/73/25-11-2002 "Regulation on the Management and Assignment of Domain Names holding the [.gr] suffix (GG Issue 1617/B/31-12-2002) and commencement of operation of the Registry", GG Issue 559/B/02-04-2004.
- EETT Decision 313/110/2004 "Modification of EETT Decision 302/11/2003 "Microcell Antenna Systems for which no licence is required, in accordance with article 1 of Law 2801/2000", GG Issue 717/B/13-05-2004.
- 80. EETT Decision 317/58/2004 "Modification of EETT Decision 254/72/31-5-2002 "Regulation on the Assignment of Individual Radio Frequencies to

- Radio Stations for Private Use (GG Issue 895/B/2002)", GG Issue 963/B/28-06-2004.
- 81. EETT Decision 318/28/2004 "Establishment of a readiness system for the staff to be engaged in the Spectrum Monitoring Department of the Spectrum Directorate of EETT", GG Issue 847/B/09-06-2004.
- 82. EETT Decision 318/29/2004 "Establishment of a temporary shifts system for the staff to be engaged in the Spectrum Directorate of EETT", GG Issue 847/B/09-06-2004.
- 83. EETT Decision 319/71/2004 "Distribution of overtime, night, and exemptionary days for the EETT staff, for the second semester of 2004", GG Issue 983/B/30-06-2004.
- 84. EETT Decision 319/72/2004 "Granting of a Fixed Advance Payment (upon submission of account) to Drivers of EETT", GG Issue 1023/B/08-07-2004.
- 85. EETT Decision 325/233 "Deletion of frequencies

- from the National Radio Frequencies Registry", GG Issue 1345/B/31-08-2004.
- 86. EETT Decision 326/228/2004 "Regulation on the temporary import in the country and operation of radio equipment and telecommunications terminal equipment not bearing the CE marking in cases of international events", GG Issue 1309/B/27-08-2004.
- 87. EETT Decision 331/70/2004 "Final Interface texts in accordance with article 4.1 of PD 44/2002 Approval and Publication in the Government Gazette", GG Issue 1911/B/24-12-2004.
- 88. EETT Decision 334/45/2004 "Cost accounting results control of the Hellenic Telecommunications Organization (OTE) for the year 2004 (based on the actual results of 2002) for the regulated wholesale services", GG Issue 1730/B/23-11-2004.

#### APPENDIX II.

## European Union Regulatory Framework for the Telecommunications Sector (as in force on 31 December 2004)

- Council Directive 1987/372/EEC of 25 June 1987 on the frequency bands to be reserved for the coordinated introduction of public pan-European cellular digital land-based mobile communications in the Community.
- Commission Directive 1988/301/EEC of 16 May 1988 on competition in the markets in telecommunications terminal equipment.
- 3. Directive 1995/62/EC of the European Parliament and of the Council of 13 December 1995 on the application of Open Network Provision (ONP) to voice telephony.
- 4. Directive 1997/67/EC of the European Parliament and of the Council of 15 December 1997 on common rules for the development of the internal market of Community postal services and the improvement of quality of service.
- Commission Decision 97/607/EC of 18 June 1997 concerning the granting of additional implementation periods to Greece for the implementation of Directive 1990/388/EEC as regards full competition in the telecommunications markets.
- Directive 1998/84/EC of the European Parliament and of the Council of 20 November 1998 on the legal protection of services based on, or consisting of, conditional access.
- 7. Directive 1998/61/EC of the European Parliament and of the Council of 24 September 1998 amending Directive 1997/33/EC with regard to operator Number Portability and Carrier Pre-selection.
- 8. Directive 1999/5/EC of the European Parliament and of the Council of 9 March 1999 on Radio Equipment and Telecommunications Terminal Equipment and the mutual recognition of their conformity.
- 9. Regulation 2887/2000/EC of the European Parliament and of the Council of 18 December 2000 on Unbundled Access to the Local Loop.

- Directive 2002/21/EC of the European Parliament and of the Council of 7 March 2002 on a common regulatory framework for electronic communications networks and services (Framework Directive), OJ L. 108, 24-04-2002, p. 0033-0050.
- Directive 2002/20/EC of the European Parliament and of the Council of 7 March 2002 on the authorisation of electronic communications networks and services (Authorisation Directive), OJ L. 108, 24-04-2002, p. 0021-0032.
- Directive 2002/19/EC of the European Parliament and of the Council of 7 March 2002 on access to, and interconnection of, electronic communications networks and associated facilities (Access Directive), OJ L. 108, 24-04-2002, p. 0007-0020.
- Directive 2002/22/EC of the European Parliament and of the Council of 7 March 2002 on Universal Service and users' rights relating to electronic communications networks and services (Universal Service Directive), OJ L. 108, 24-04-2002 P. 0051-0077.
- Directive 2002/58/EC of the European Parliament and of the Council of 12 July 2002 concerning the processing of personal data and the protection of privacy in the electronic communications sector (Directive on privacy and electronic communications), OJ L. 201, 31-07-2002, p. 0037-0047.
- 15. Commission Directive 2002/77/EC of 16 September 2002 on competition in the markets for electronic communications networks and services, OJ L. 249, 17-09-2002, p. 0021-0026.
- Decision 676/2002/EC of the European Parliament and of the Council of 7 March 2002 on a regulatory framework for radio spectrum policy in the European Community (Radio Spectrum Decision), OJ L. 108, 24-04-2002, p. 0001-0006.
- 17. Decision 2002/627/EC of 29 July 2002 establishing

- the European Regulators Group for electronic communications networks and services, OJ L. 200, 30-07-2002, p. 0038-0040.
- 18. Regulation 1/2003/EC of the European Council of 16 December 2002 on the implementation of the rules on competition laid down in articles 81 and 82 of the Treaty, OJ L. 1 of the 4-01-2003, p. 0001-0025.
- Decision 2003/548/EC of the European Commission of 24 July 2003 on the minimum set of Leased Lines with harmonised characteristics, and associated standards, referred to in article 18 of the Universal Service Directive, OJ L. 186 of the 25-07-2003, p. 0043-0045.
- 20. Commission Recommendation of 23 July 2003 on notifications, time limits and consultations provided for in Article 7 of Directive 2002/21/EC of the European Parliament and of the Council on a

- common regulatory framework for electronic communications networks and services (notified under document number E(2003) 2647).
- 21. Commission Recommendation of 25 July 2003 on the processing of caller location information in electronic communication networks for the purpose of location-enhanced emergency call services (notified under document number E(2003) 2657).
- 22. Commission Recommendation of 25 May 2000 on unbundled access to the local loop: enabling a competitive provision of a full range of electronic communications services including broadband multimedia and high-speed Internet (notified under document number E (2000) 1259).
- 23. Directive 1999/93/EC of the European Parliament and of the Council of 13 December 1999 on a Community framework for electronic signatures.

### **APPENDIX III.**

# List of Undertakings Licensed to Provide Telecommunications Services (as in force on 31 December 2004)

	A. INDIVIDUAL LICENCES							
	INSTALLATION, OPERATION & EXPLOITATION OF FIXED NETWORK AND PROVISION OF VOICE TELEPHONY							
No	o DISTINCTIVE TITLE ADDRESS CITY PC TEL./FAX							
1.	COSMOTE S.A.	44 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 617 7777/ +30210 617 7384			
2.	EUROPROM	209 KIFISSIAS AVE.	MAROUSSI	151 24	+30210 614 1106/ +30210 809 7620			
	TELECOMMUNICATIONS S.A.							
3.	FORTHNET S.A.	4 ATTHIDON ST.	KALLITHEA	176 71	+30210 955 9000/ +30210 955 9444			
4.	INFO QUEST S.A.	25-27 AL. PANDOU ST.	KALLITHEA	176 76	+30210 950 4672/ +30210 950 4530			
5.	INTRACONNECT S.A.	12 VOUTSA ST.	N. IONIA	142 31	+30210 285 5830/ +30210 285 5839			
6.	LAN-NET S.A.	1 KONSTANDINOUPOLEOS ST.	PERISTERI	121 32	+30210 616 7000/ +30210 616 7100			
		& KIFISOU ST.						
7.	MEDITERRANEAN BROADBAND	4 ATTHIDON ST.	KALLITHEA	176 71	+30210 955 9050/ +30210 955 9055			
	ACCESS S.A.							
8.	OTE	99 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 611 1000/ +30210 611 7456			
9.	TELLAS	1A & 3 NEAPOLEOS ST.	MAROUSSI	151 23	+30210 811 3411/ +30210 811 3459			
	TELECOMMUNICATIONS S.A.							
10.	TIM HELLAS	66 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 615 8000/ +30210 610 9957			
11.	VIVODI	29-31 DERIGNI ST.	ATHENS	104 34	+30210 889 3700/ +30210 889 3701			
	TELECOMMUNICATIONS S.A.	& 18 ELPIDOS ST.						
12.	VODAFONE S.A.	1-3 TZAVELA ST.	CHALANDRI	152 31	+30210 616 0000/ +30210 616 0001			

	INSTALLATION, OPERATION & EXPLOITATION OF FIXED NETWORK						
No	DISTINCTIVE TITLE ADDRESS CITY PC TEL./FAX						
1.	1. ATTICA TELECOMMUNICATIONS 78A LOUIZIS RIANKOUR ST. ATHENS 115 23 +30210 687 3800/ +30210 685 2						
2.	MEDITERRANEAN NAUTILUS GREECE S.A.	SOKRATOUS ST. & 2 KIPROU ST.	MELISSIA	151 27	+30210 810 2633/ +30210 803 0555		

		PROVISION OF VOICE TEL	EPHONY SERVICES	5	
No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
1.	ACN S.A.	14 PATMOU ST.	MAROUSSI	151 23	+30210 687 2900/ +30210 687 2901
2.	ALGONET S.A.	206 SINGROU AVE.	N. SMIRNI	171 21	+30210 931 0282/ +30210 935 2873
3.	COLUMBIA TELECOM S.A.	22 D. MARGARI ST.	ATHENS	115 25	+30210 677 9610
4.	COSMOLINE	47 AG. KONSTANDINOU ST.	MAROUSSI	151 24	+30210 812 6000/ +30210812 6100
5.	E CALL S.A.	30 ZINONOS ST.	ATHENS	104 37	+30210 520 3314
6.	INTERCONNECT LTD.	10-16 MINOOS ST.	N. KOSMOS	117 43	+30210 929 6741-2
7.	NET ONE S.A.	2 PERIKLEOUS ST.	N.PSICHIKO	154 51	+30210 678 1300/ +30210 678 1390
8.	NEWSPHONE	280 THISEOS ST.	KALLITHEA	176 75	+30210 947 2222/ +30210 947 2223
9.	RG COMMUNICATIONS	34 VERATZEROU ST.	ATHENS	104 32	+30210 899 6516/ +30210 899 6519
10.	TELEDOME S.A.	10 FILARETOU ST.	KALLITHEA	176 72	+30210 956 9277/ +30210 956 3882
		& DOIRANIS ST.			
11.	TELEPASSPORT (HELLAS) S.A.	81 PATISSION ST.	ATHENS	104 03	+30210 820 9000/ +30210 820 9009
		& 8 HEYDEN ST.			
12.	VOICENET	5 PROFITI ILIA SQ.	PANGRATI	116 35	+30210 757 3100/ +30210 757 3111
13.	WEB COMMUNICATIONS	64 MOUTALASKI ST.	N.IONIA	142 34	+30210 272 0006/ +30210 271 4008

	INSTALLATION, OPERATION AND EXPLOITATION OF 2G MOBILE NETWORKS AND PROVISION OF 2G SERVICES							
No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX			
1.	COSMOTE	44 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 617 7777/ +30210 617 7384			
2.	INFO QUEST S.A.	25-27 AL. PANDOU ST.	KALLITHEA	176 71	+30210 950 4672/ +30210 950 4530			
3.	TIM HELLAS	66 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 615 8000/ +30210 610 9957			
4.	VODAFONE S.A.	1-3 TZAVELA ST.	CHALANDRI	152 31	+30210 616 0000/ +30210 616 0001			

	INSTALLATION, OPERATION AND EXPLOITATION OF 3G MOBILE NETWORKS AND PROVISION OF 3G SERVICES							
No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX			
1.	соѕмоте	44 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 617 7777/ +30210 617 7384			
2.	TIM HELLAS	66 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 615 8000/ +30210 610 9957			
3.	VODAFONE S.A.	1-3 TZAVELA ST.	CHALANDRI	151 25	+30210 616 0000/ +30210 616 0001			

INSTA	LLATION, OPERATION AND EXPLOITATION	OF SATELLITE NETWORKS	AND PROVISION	OF SATEL	LITE COMMUNICATIONS SERVICES
No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
1.	ALPHA DIGITAL SYNTHESIS S.A. (A.D.S.)	201 PIREOS ST.	ATHENS	118 53	+30210 489 7459/ +30210 489 7411
2.	ANTENNA SATELLITE S.A.	10-12 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 688 6400/ +30210 689 2113
3.	COM-TO-NET S.A.	13 EGIDON ST.	N. KIFISSIA	145 64	+30210 624 9600/ +30210 625 3761
		& SENEKA ST.			
4.	FORTHNET S.A.	4 ATTHIDON ST.	KALLITHEA	176 71	+30210 955 9000/ +30210 955 9444
5.	KB IMPULS HELLAS S.A.	109 AMFITHEAS AVE.	P. FALIRO	175 63	+30210 988 1430/ +30210 985 4736
6.	NEURON	280 KIFISSIAS AVE.	CHALANDRI	152 32	+30211 120 3000/ +30211 120 3005
7.	ОТЕ	99 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 611 1000/ +30210 611 7456
8.	SYNED	MANIS ST.	KANDZA	151 23	+30210 660 2212/ +30210 604 6111
9.	TWIN PEAK	11 GENNADIOU ST.	AG. DIMITRIOS	173 41	+30210 933 7785/ +30210 937 3276
10.	TELESPAZIO S.P.A.	VIA TIBURTINA 965	ROMA	156	+39 06 40791/ +39 06 4079372
11.	UNITEL HELLAS S.A.	152 SEVASTOUPOLEOS ST.	ATHENS	115 26	+30210 950 4780/ +30210 950 4781

	PROVISION OF WIRELESS LOCAL AREA NETWORK (W-LAN) SERVICES							
No	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX			
1.	соѕмоте	44 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 617 7777/ +30210 617 7384			
2.	FORTHNET S.A.	4 ATTHIDON ST.	KALLITHEA	176 71	+30210 955 9000/ +30210 955 9444			
3.	INTERNATIONAL AIRPORT OF ATHENS	KTIRIO DIOIKISIS	SPATA	190 19	+30210 353 6415			
4.	ОТЕ	99 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 611 1000/ +30210 611 7456			
5.	OTENET	56 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 615 1600/ +30210 615 1700			
		& DELFON ST.						
6.	VODAFONE S.A.	1-3 TZAVELA ST.	CHALANDRI	152 31	+30210 616 0000/ +30210 616 0001			

	INSTALLATION, OPERATION AND EXPLOITATION OF TETRA NETWORKS AND PROVISION OF TETRA SERVICES							
No	DISTINCTIVE TITLE	DISTINCTIVE TITLE ADDRESS CITY PC TEL./FAX						
1.	OTE	99 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 611 1000/ +30210 611 7456			

No	REG.	DISTINCTIVE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE
		TITLE					GENERAL AUTHORIZATION
1.	01-025	3NET S.A.	23-25 LEKKA ST.	ATHENS	105 62	+30210 322 9885/ +30210 322 2452	A0101, A0601, A0602, A0603, A0604, A0605, B0101, B0103, B0301, B0401
2.	98-040	4GM (TECHNOLOGIES NEON MESON)	8 G. PALAMA ST.	THESSALONICA	546 22	+30231 026 0252/ +30231 026 0252	A0401, A0701
3.	96-031	A.S.D.A.	65 ETHNIKIS ANTISTASEOS ST.	PERISTERI	121 34	+30210 574 5826/ +30210 575 9547	A0701, A0401
4.	01-275	ABC TELECOM HELLAS S.A.	85 MONASTIRIOU ST.	THESSALONICA	546 27	+30231 047 6620/ +30231 047 6613 +30231 047 6608	A1102
5.	99-203	ACIS GROUP	7 KARATASOU ST.	THESSALONICA	546 26	+30231 054 2605/ +30231 054 2614	A0701. A0401
7. 8. 9.	98-011 02-019 01-237	ALFA ENGINEERING ALFA TEL ALFANET S.A. ALFATEL S.A.	7 KONSTANDINIDI ST. 70 AG. PANTELEI- MONOS ST. 9 ACHELOOU ST. 70 AG. PANTELEI-	NAOUSA KERATSINI THESSALONICA KERATSINI	151 23 592 00 187 55 546 27	+30210 687 2900/ +30210 687 2901 +30229 602 6194/ +30229 602 2528 +30210 462 6145/ +30210 463 6894 +30231 050 0760/ +30231 050 0767 +30210 406 1700/ +30210 461 3793	A1002, A0101, A0201, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0602, A0603, A0604, A0605, A0606, A0607, A0801, A0802, A0803, A0901, A1101, A1202, B0103, C0101, C0201, C0202, C0203, C0204, C0205, C0302, C0303, C0401, C0402, C0403, A0202, A0301, A0601, A0701, A1001, A1102  A0701  A1102  A0301, A0401, A0602, A0701
11.	99-192	ALGONET S.A.	MONOS ST. 206 SINGROU AVE.	KALLITHEA	176 72	+30210 955 8300/ +30210 955 8301	A0201, A0202, A0301, A0403, A0601 A0701, A1001, A0101, A0401, A0501 A0502, A0503, A0603, A0604, A0605 A0606, A0607, A1002, A1101, A1102 A1103
12.	98-003	ALPHALINE	19 MEANDROU ST.	ATHENS	115 28	+30210 728 0800/ +30210 728 0803	A1102
13.	04-067	ALPHAPHONE	2-4 ZILON ST.	ATHENS	117 42	+30211 751 7500/ +30211 751 7520	A0202, A0401, A0701, A1001
		ALTA S.A. ALTEC S.A.	17A LISIKRATOUS ST. 12 PATMOU ST.	ATHENS MAROUSSI			A0201, A1001, A0303, A0403, A0601 A0101, A0201, A0301, A0401, A0403 A0411, A0601, A0602, A0604, A0605 A0701, A1001, A1002
16.	04-111	AMAZE	135-137 EL. VENIZELOU ST.	ATHENS	176 76	+30210 955 0630/ +30210 955 0610	
17.	99-195	AMIMEX LTD.	15-17 SARANDA- PICHOU ST.	ATHENS	114 71	+30210 645 3376/ +30210 645 3367	A1201, A0101, A0603, A0604, A1001, A1002, A1101, A1103, A0403, A0701, A0301, A0601
18.	00-025	AN.ET.A. S.A.	1 DIMOKRATIAS AVE.	ALEXANDROU- POLI	681 00	+30255 108 8340/ +30255 108 8342	A0301, A0701, A0101, A0201, A0401, A0501, A0604, A0605, A0901
19.	01-229	ANTENNA INTERNET S.A.	10-12 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 688 6727/ +30210 688 6542	

No	REG.	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORIZATION
20.	01-278	ANTENNA TV S.A.	10-12 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 688 6100/ +30210 689 0304	A0701
21.	00-026	APOPSI S.A.	33 M. BOTSARI ST.	DRAPETSONA	186 48	+30210 462 9300/ +30210 461 9565	A0701
22.	01-264	ARGONET	35 ARGONAFTON ST.	VOLOS	383 33	+30242 107 6400/ +30242 102 9049	A0401, A0701
23.	00-023	ASTRA INTERNATIONAL S.A.	9 GUILFORDOU ST.	ATHENS	104 34	+30210 825 4200/ +30210 823 4184	A1102
24.	99-201	AT & T G.N.S. LTD.	284 KIFISSIAS AVE.	CHALANDRI	152 32	+30210 685 6222/ +30210 688 1562	A0401, A0407, A0701, A0301, A0402, A0604, A0201, A0202, A0302, A0403, A0501, A0503, A0601, A0602, A0603, A0605, A0606, A1002
25.	00-032	ATHENS INTER- NATIONAL AIRPORT S.A. "EL. VENIZELOS"	INTERNATIONAL AIRPORT OF ATHENS - KTIRIO DIOIKISIS	SPATA	190 19	+30210 353 6415/ +30210 353 7782	A0301, A0202, A0701, A1001
26.	03-069	ATHENSLINE	3 - 5 FILODAMIAS ST.	ATHENS	104 42	+30210 515 6740/ +30210 515 6741	A1102
27.	97-024	ATLAS NET	5 IVISKOU ST. & PEFKON ST.	AG. IEROTHEOS - PERISTERI	121 37	+30210 577 9969/ +30210 578 6532	A0701
28.	04-035	ATNET COMMUNICATIONS S.A.	4 KOURTIDOU ST.	ATHENS	104 45	+30210 854 7745/ +30210 854 7820	A0701
29.	02-030	ATTIKES TELECOM- MUNICATIONS S.A.	78A LOUIZIS RIANKOUR ST.	ATHENS	115 23	+30210 693 0670-4/ +30210 693 0675	A0101, A0201, A0301, A0302, A0602, A0603, A0604, A0801
30.	97-016	AUCS HELLAS S.A.	38 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 619 8872/ +30210 619 8995	A0301, A0402, A0602, A0604, A0605, A0401, A0601, A0603, A0701
31.	96-033	AUDIOTEX S.A.	10-12 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 680 0840-3/ +30210 680 0843	A1102
32.	01-012	AURORA GLOBAL SOLUTIONS S.A.	48 ZEPPOU ST.	GLIFADA	166 75	+30210 893 1000/ +30210 893 1000	A0101, A0201, A0301, A0302, A0411, A0601, A0605, A0606, A0701, A0901, A1001
33.	02-081	AXIOM NET S.A.	4 PINIOU ST.	THESSALONICA	562 24	+30231 076 1561/+30231 070 6795	A0101, A0201, A0401, A0701, A0901
34.	01-240	AXIOMA	3 THIATIRON ST.	N. SMIRNI	171 21	+30210 935 1512/ +30210 935 3688	A0701, A1102
35.	96-038	BEE GROUP S.A.	19 PALEOLOGOU ST.	LARISSA	412 23	+30241 055 4045/ +30241 055 0333	A0604, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409,A0410,A0411
36.	02-013	BELGACOM	BOULEVARD DU ROI ALBERT II 27	BRUSSELS	1030	+32 220 28337/ +32 220 34683	A0201, A0202, A0301, A0701, A1001
37.	01-027	BEST DELIVCOM	47 FAVIEROU ST.	CHALKIDA	341 00	+30222 106 1170/ +30222 106 1172	A0101, A0201, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701
38.	01-239	BOLERO	1 NOTARA ST.	ATHENS	106 83	+30210 384 7970/ +30210 935 3688	A1102
39.	03-034	B-PHONE	54-56 THEM. SOFOULI ST.	PALAIOKASTRO	546 55	+30231 040 3384/ +30231 042 0351	A1102
40.	04-016	BT SOLUTIONS LIMITED	9 ASPASIAS ST.	ATHENS	116 34	+30210 770 1690/ +30210 777 3556	A0101, A0201, A0202, A0301, A0302, A0401, A0601, A0602, A0605, A0701, A1001, A1002

No	REG.	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORIZATION
41.	02-042	CABLE & WIRELESS	124 THEOBALDS ROAD	LONDON	WC1X 8RX	+44(0) 207 315 4000/	A0101, A0201, A0202, A0301,
		COMMUNICATIONS				+44(0) 207 315 5000	A0302, A0401, A0402, A0403,
							A0404, A0405, A0501, A0601,
							A0602, A0604, A0605, A0701
42	01-244	CALL CENTER	1 VILARA ST.	THESSALONICA	546 25	+30231 055 5801-2/+30231 053 3412	
43.	96-006	CHIOS COMPULINK	31 EL. VENIZELOU ST.	CHIOS	821 00	+30227 108 8331/ +30227 108 1332	A0701
44.	00-018	CITISHOP S.A.	501 MESSOGION AVE.	AG. PARASKEVI	153 43	+30210 606 8213/ +30210 600 2037	A0301, A0601, A1001, A0202, A0403, A0701
45.	99-173	COLUMBIA TELECOM S.A.	22 D. MARGARI ST.	ATHENS	115 25	+30210 677 9610/ +30210 675 6940	A0601, A0403, A0101, A 0701, A0201, A0202, A0301, A0302, A0401, A0402, A1001, A1002, A0604
46.	96-015	COMPUTER LAB - DIKTIO	8 PR. CHRISTO- FOROU ST.	SERRES	621 00	+30232 102 0551/ +30232 105 2185	A0701
47.	98-025	COMPUTER SCIENCE	3 OCTOBER 28th ST.	ARGOS	212 00	+30275 102 4141/+30275 102 2566	A0701
48.	00-010	COM-TO NET S.A.	13 EGIDON ST. & SENEKA ST.	N. KIFISSIA	145 64	+30210 624 9600/ +30210 625 3761	A0202, A0701, C0101, C0204, C0205, C0303, C0402, A0201, A0301
49.	04-103	COSMOCONNECT LTD.	19 SITHONIAS ST.	ATHENS	115 22	0049(0)2111592-0/ 0049(0)211159242-11	A0301, A0302, A0401, A0402, A0403, A0604, A0607, A1001, A1002, A1101, A1102, A1103, B0103
50.	97-013	COSMOLINE S.A.	47 AG. KOSTANDINOU ST.	MAROUSSI	151 24	+30210 812 6000/ +30210 812 6100	A0301, A0604, A0601, A0701, A1001, A1002, A1202, C0204
51.	01-236	COSMO-ONE HELLAS (MARKET SITE)	452 MESSOGION AVE.	AG.PARASKEVI	153 42	+30210 601 9040/ +30210 601 9042	A0402, A0404, A0701
52.	01-274	COSMOS COMPUTERS S.A.	73 VRILISSOU ST.	ATHENS	114 76	+30210 649 2800/ +30210 646 4069	A0101, A0201, A0401, A0501, A0603, A0604, A0605, A0701
53.	97-001	COSMOTE S.A.	44 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 617 7777/ +30210 617 7384	A0202, A0401, A1001, A0601, A0604, A0301, A0701, A1102
54.	04-007	СҮТА	1 TILEPIKINONION ST.	NICOSIA	M.B. 24929 CY 1396	+35722701415/ +35722494155	A0701, A1002
55.	04-006	CYTA HELLAS S.A.	3 STRATIGOU TOBRA ST.	ATHENS	153 42	+30210 262 6116/ +30210 262 2687	A0101,A0201, A0301, A0601, A0605, A0701,A1002
56.	98-004	DALLAS INFORMATION SYSTEMS		IGOUMENITSA	461 00	+30266 502 3674/ +30266 502 2317	A0701
57.	96-001		16 ARCHIMIDOUS ST. & KIPROU ST.	TAVROS	177 78	+30210 485 5200/ +30210 485 5222	A0101, A0202, A0301, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0501, A0502, A0503, A0605, A0606, A0607, A0701, A0901, A1001, A1002, A1101, B0102, B0103, B0104, B0101, C0201, C0202, C0203, C0204, C0205, A0604, A1102
58.	00-009	DATAWAYS HELLAS S.A.	85 NOVEMBER 17th ST.	THESSALONICA	543 52	+30231 095 3953/ +30231 095 3963	A0701

No	REG.	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORIZATION
59.	98-033	DEFENDER GROUP S.A.	30 SINGROU AVE.	THESSALONICA	546 30	+30231 054 1901/ +30231 053 7065	A0701, A0401
60.	01-248	1-248 DEPA S.A.	207 MESSOGION AVE.	ATHENS	115 25	+30210 679 3500/ +30210 674 9504	A0101, A0201, A0301, A0302,
							A0303, A0401, A0402, A0403,
							A0404, A0405, A0406, A0407,
							A0408, A0409, A0410, A0411,
							A0501, A0502, A0503, A0601.
							A0602, A0603, A0604, A0605,
							A0606, A0607, A0701, A0801,
							A0802, A0803, A0901, A1001,
	01 010	DETECA DD 6501/105	ALL EDGDEDOED 400	AU DAIDEDO	00/01	(0.044 (000.0004	A1002, A1101, A1102, A1201
61.	01-019	DETECARD SERVICE	ALLERSBERGER 130	NURNBERG	904 61	+49 9114303 3900/ +49 9114303 2009	A1001
62.	96-021	DIAVLOS PLIROFORIKI	15 E. SOFOULI ST.	SAMOS	831 00	+30227 302 8521/ +30231 045 6376	A0701
63.	99-199	DIONI S.A.	31 AKADIMIAS ST.	ATHENS	106 72	+30210 338 3500/ +30210 338 3510	A0301, A0303, A0403, A0701, A0302
64.	99-167	DOMI PLIROFORIKI S.A.	55 DODEKANISSOU ST.	PIRAEUS	185 40	+30210 422 4959/ +30210 413 7123	A0401, A0701
65.	04-071	DOTCOM S.A.	12-14 PENTELIS AVE.	CHALANDRI	152 33	+310210 689 6103/ +30210 689 6105	A0301, A0401, A0601, A0605,
							A0701, A1001, A1002
66.	03-061	DOTSOFT	63 MITROPOLEOS ST.	THESSALONICA	546 23	+30231 027 4566/ +30231 027 4290	A0401, A0404, A0701
67.		E CALL S.A.	30 ZINONOS ST.	ATHENS	104 37	+30210 520 3314/ +30210 523 3015	A1001,A1002,A1101,A1102
68.	96-024		56-58 CH. TRIKOUPI ST.	ATHENS	106 80	+30210 363 3650/ +30210 363 3107	A0701, A0401
69.		EB2B COM	3 OMIROU ST.	TRIKALA	421 00	+30243 107 5758/ +30243 107 5759	A0401, A0402, A0403, A0404,
00.		& V. OUGO ST.	o ominoo or.	ITHIVALA		100240 107 07007 100240 107 0700	A0405, A0406, A0407, A0408,
		u v. 0000 51.					A0409, A0410, A0411, A0701
70.	00 160	ECONOPHONE	41 ATHINAS AVE.	VOULIAGMENI	166 71	+30210 967 0733/ +30210 967 0442	A0101, A0201, A0301, A0302,
70.	33-100	HELLAS S.A.	41 ATTIINAS AVE.	VOOLIAOMEN	100 /1	T30210 307 0733/ T30210 307 0442	A0405, A0406, A0501, A0503,
		HELLAS S.A.					
							A0602, A0603, A0604, A0605,
							A0606, A0607, A0901, A1002,
							A1101, A1102, A1201, C0101,
							C0204, C0205, C0302, C0303,
							A0401, A0402, A0403, A0601,
							A0701, A1001
71.	01-010	EDISINET S.A.	46 PATISSION ST.	ATHENS	108 62	+30210 822 0054/ +30210 821 7663	A0101, A0201, A0301, A0401,
							A0603, A0605, A0607, A0701,
							A0901
72.	02-022	EKDOSIS THEMA LTD.	31 EPIKOUROU ST.	ATHENS	105 53	+30210 331 5316/ +30210 324 8363	A1101, A1102
73.	96-022	ELEA LTD.	50-52 VALTETSIOU ST.	ATHENS	106 81	+30210 380 2335/ +30210 380 6770	A0604, A0701
74.	98-029	ENDELECHIA LTD.	15 DITIKIS THRAKIS ST.	SERRES	621 24	+30232 105 7518/ +30232 105 7519	A0701
75.	96-029	ENTERNET	18 AMALIADOS ST.	ATHENS	115 24	+30210 647 0800/ +30210 647 0803	A0401, A0701
76.	96-014	EQUANT LTD.	16 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 688 2800/ +30210 680 1561	A0604
77.	00-024	EQUINOX D.R. LTD.	22 KANARI ST. & 34 DIMOSTHENOUS ST.	AG. PARASKEVI	153 43	+30210 601 5900/ +30210 600 4400	A0701, A0401, A1001
78.	01-265	E-SAT S.A.	109 AMFITHEAS AVE.	P. FALIRO	175 63	+30210 985 8126-9/ +30210 985 3671	A0101, A0201, A0202, A0301,
				1.1ALINU			A0401, A0405, A0501, A0602,
							A0701, A0802, A0901, C0101,
							C0201, C0204, C0205, C0301,
							C0303, C0403

No	REG.	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORIZATION
79.	98-023	ETHNODATA S.A.	12 THESSALONIKIS ST.	MOSCHATO	183 46	+30210 480 6812/ +30210 480 6815	A0701
80.	01-021	E-TONE S.A.	10 ARKADIOU ST.	MAROUSSI	151 24	+30210 614 6405/ +30210 614 6233	A0201, A0301, A0401, A0403, A0501, A0601, A0602, A0605, A0701, A0901, A1001, A1002,
81.	99-161	EURO-LINK TELECOM- MUNICATIONS S.A.	9 V. FAVI ST.	PSICHIKO	115 25	+30210 672 7278/ +30210 672 7578	A1101, B0103, B0104, B0301 A0301, A0601, A0701, A0501, A0502, A0604, A1001, A1002, A1101, A0101, A0201, A0302, A0401
82.	01-005	EUROPROM TELE- COMMUNICATIONS S.A.	209 KIFISSIAS AVE.	MAROUSSI	151 24	+30210 614 1106/ +30210 809 7620	A0101, A0201, A0301, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0801, A0802, A0803, A0901, A1001, A1002, A1101, A1102, A1201
83.	96-020	EVRIPOS NET S.A.	4 ATHINAS ST.	CHALKIDA	341 00	+30222 108 4630/ +30222 108 2698	A0701
84.	00-006	EXONET S.A.	15-17 TSOCHA ST.	ATHENS	115 21	+30210 649 0000/ +30210 646 5612	A0601, A0701, A0401, A0202, A0501, A0502, A0901, A1001, A1002, A0301, A0403, A0604
85.	00-002	EXPRESSNET	91 GIANNITSON ST.	THESSALONICA	546 27	+30231 053 7137/+30231 054 5358	A0701, A0401
86.	01-250	EXTRA LINE LTD.	10 SINGROU AVE.	THESSALONICA	546 26	+30231 059 0400/ +30231 059 0405	A0401, A0901, A1102, A1103
87.	96-036	FASTNET S.A.	18 EGIALIAS ST.	PARADISOS- MAROUSSI	151 25	+30210 682 9035/ +30210 682 9036	A0701, A0401
88.	03-038	FILIKI DIADIKTIAKI S.A.	46 PANEPISTIMIOU ST.	ATHENS	106 78	+30210 330 6016/ +30210 330 6018	A0701
89.	03-054	FINE TELECOM- MUNICATIONS LTD.	18A SAMIS ST.	ANO PATISSIA	111 42	6976739892	A1001, A1002
90.		FLAG TELECOM	69 VATAZI ST.  5 LIVINI ST.	ATHENS	114 73		A0101, A0201, A0301, A0302, A0303, A0401, A0403, A0410, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A1001, A1002, A1101, A1102, A1201 A0101, A0201, A0202, A0301,
		HELLAS					A0302, A0401, A0601, A0602, A0603, A0605, A0606, A0701
92.	02-021	FONOTEL S.A.	55 TENEDOU ST.	ATHENS	113 61	+30210 866 5130/ +30210 866 5130	A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A1001, A1002
93.	01-280	FORTH-CRS	3 ARGIROUPOLEOS ST.	ARGIROUPOLI	164 51	+30210 955 9280/ +30210 955 9289	A0202, A0301, A0302, A0401, A0602, A0603, A0604, A0605, A0701, A0901
94.	99-204	FORTHE-COM	4 ATTHIDON ST.	KALLITHEA	176 71	+30210 955 9300/ +30210 955 9333	A0402, A0401, A0901, A0301, A0404
95.	99-211	FORTHLINK S.A.	40 PERIKLEOUS ST.	MAROUSI	151 22	+30210 854 2604/ +30210 854 2604	A0701, A0401

No	REG.	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORIZATION
96.	97-004	FORTHNET S.A.	4 ATTHIDON ST.	KALLITHEA	176 71	+30210 955 9000/ +30210 955 9444	A0601, A0701, A0202, A0301,
							A0302, A0401, A0402, A0403,
							A0602, A0603, A0604, A0605,
							A0901, A1002, A0201, A0303,
							A0404, A0405, A0501, A0502,
							A0503, A0606, A0607, A1001,
							A1101, A1102, A1103, A0101
97.	99-163	FREE PHONE HELLAS	3 MIAOULI ST.	THESSALONICA	546 42	+30231 081 3950/ +30231 088 7922	A0301, A0403, A0601
98.	98-031	G.T GREEK	31 AKADIMIAS ST.	ATHENS	106 72	+30210 338 3500/ +30210 338 3510	A0101, A0601, A0604, A0701,
		TELECOM S.A.					A1001, A0402, A0404, A0604,
							A0403, A0101
99.	98-008	GALILEO HELLAS S.A.	MISTRA ST. & 31st ST.	ELLINIKO	167 77	+30210 893 1700/ +30210 963 4566	A0201, A0202, A0301, A0401,
00.	00 000	07121220 1122210 0.71	Morrovor. dor or.	ELLII III (O	10, ,,	100210 000 17007 100210 000 4000	A0601, A0603, A0605, A1001,
							A1002
100.	99_182	GATEWAY TELECOM-	362 KIFISSIAS AVE.	CHALANDRI	152 33	+30210 811 8100/ +30210 684 8068	A0601, A0604
100.	33-102	MUNICATIONS S.A.	JUZ KIFIJJIAJ AVE.	CHALANDRI	132 33	+30210 011 0100/ +30210 004 0000	A0001, A0004
101.	97-002	GIANNOPOULOS G. & VOUTSIS I. & CO	5 KEFALA ST.	KALAMATA	241 00	+30272 102 7931/ +30272 109 5020	A0701
102.	97_006	GLOBAL	62 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 619 8951/ +30210 619 8957	A0301, A0401, A0402, A0403,
102.	37-000	ONE HELLAS	UZ KIFISSIAS AVE.	MAROUSSI	131 23	+30210 019 0931/ +30210 019 093/	A0601, A0602, A0603, A0604,
		ONE HELLAS					
102	01 000	CLODAL	EVII ADA CT	ATUENIC	10/ 27	. 20210 520 2000/ . 20210 520 2007	A0605, A0606, A0607, A0701
103.	01-000	GLOBAL TELELINK LTD. (GTL)	5 VILARA ST.	ATHENS	104 37	+30210 520 2989/ +30210 520 2987	A0601, A0403, A1001
104.	99-175	GRECIANNET	101 KISSAMOU ST.	CHANIA	731 31	+30282 109 7554/ +30282 107 6263	A0701, A0401
105.	03-037	GREECECALL S.A.	25 ILISSION AVE. &	N. KIFISSIA	145 64	+30210 807 9709/ +30210 807 9118	A0403, A0406, A0407,A0501,
			DIMITROS ST.				A0502, A0901, A1001, A1002,
							A1101, A1102, A1103, B0103,
							B0104, B0201, C0203, C0205,
							C0301, C0302, C0303
106.	99-196	GREVENA	5 E. PAPPA ST.	GREVENA	511 00	+30246 202 5110/ +30246 208 0310	A0701
		CHAMBER NET			4-4-4-		
107.	96-041	GROOVY PRODUCTIONS	24 P. TSALDARI ST.	MELISSIA	151 27	+30210 613 4444/ +30210 803 2562	A0701
108.	96-035	GROUP 3 S.A.	37 P. GRIGORIOU E' ST.	THESSALONICA	542 48	+30231 032 4440/ +30231 030 8829	A0701
109.	97-010	HELLAS NET	4 ATTHIDON ST.	KALLITHEA	176 71	+30210 955 9500/ +30210 955 9555	A0301, A0403, A0402, A0701,
							A0401
110.	97-003	HELLAS ON LINE	59-61 AG. KONSTA-	MAROUSSI	151 24	+30210 876 2000/ +30210 805 6790	A0201, A0202, A0301, A0501,
			NDINOU BUILDING B.				A0802, A0803, A0901, A1001,
							A1002, A1101, A1103, A0601,
							A0602, A0603, A0604, A0605,
							A0606, A0607, A0701, A0401,
							A0402, A0403, A0404, A0405,
							A0406, A0407, A0408, A0409,
							A0410, A0411, A0502, A0503
111.	U%-U3E	HELLAS SAT	99 KIFISSIAS AVE.	MAROUSSI	151 24	+30210 610 0600/ +30210 611 1545	C0101, C0202, C0203, C0204,
'''	U-1-000		SS INI ISSIMS AVE.	MARKOUSSI	131 24	155210 010 0000/ 750210 011 1545	C0205, C0302, C0303, C0401,
							C0402, C0403, A0201

No	REG.	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORIZATION
112.	99-176	HELLASFON	97 KANDANOU ST.	IRAKLIO	713 03	+30281 037 0370/ +30281 026 2621	A0201, A0202, A0301, A0403,
		NETWORKS S.A.		CRETE			A0601, A0701, A1001
113.	01-284	HIT S.A.	180 KIFISSIAS AVE.	CHALANDRI	152 31	+30210 950 4780/ +30210 950 4781	A0201, A0202, A0301, A0401,
							A0402, A0403, A0404, A0405,
							A0406, A0407, A0408, A0409,
							A0410, A0411, A0601, A0701,
							A1001
114.	01-258	HUB	75 TATOIOU AVE.	KIFISSIA	145 64	+30210 620 0035/ +30210 620 7331	A0401, A0701, A1002
115.	98-041	HYPERNET LTD.	57 ERMOU ST.	THESSALONICA	546 23	+30231 027 9659/ +30231 027 9858	A0701, A0401
116.	00-001	HYPERTECH S.A.	125-127 KIFISSIAS AVE.	MAROUSSI	115 24	+30210 699 6072/ +30210 699 5450	A0201, A0402, A0604, A0701, A0101, A0301, A0403, A0901
117.	98-039	I.I.S. S.A.	72-74 SALAMINOS ST.	KALLITHEA	176 75	+30210 957 6695/ +30210 957 0889	A0701, A0401
118.	98-002	IDEAL ACROPOLIS	17 SAPFOUS ST.	KALLITHEA	176 76	+30210 957 2720/ +30210 957 0111	A0401, A0604, A0701
119.	97-018	IDEAL TELECOM S.A.	190 SINGROU AVE.	KALLITHEA	176 71	+30210 956 2551/ +30210 957 9094	A0601, A0701, A0603, A0605,
							A1001, A1002, A1103, C0101,
							C0201, C0204, A0401, A0201,
							A0202, A0301, A0602, A0604,
							A0606, A1101, A1201
120.	04-011	IDT HELLAS LTD.	58 KIFISSIAS ST.	ATHENS	151 25	+30210 610 0713/ +30210 610 4392	A0101
121.	01-254	IKE-ATHINA	44 PANEPISTIMIOU ST.	ATHENS	106 79	+30210 338 7702/ +30210 364 6392	A0401, A0701
122.	04-054	INACCESS NETWORKS	230 SINGROU AVE.	ATHENS	176 72	+30210 953 7110/ +30210 953 7129	A1101,A1102,A1103
123.	99-164	INCREDIBLE	20 KAREA ST.	ATHENS	116 36	+30210 921 2312/ +30210 921 0855	A0401. A0701
120.	33 104	NETWORKS	20 TURNER ST.	AIIIENS	11000	100210 321 2012/ 100210 321 0000	70-01, 70701
124.	01-253	INET HELLAS LTD.	88 SEPTEMBER 3 <sup>rd</sup> ST.	ATHENS	104 34	+30210 821 7460/ +30210 822 9740	A0701, A0901, A1002
125.	01-257	INFO QUEST S.A.	25-27 AL. PANDOU ST.	KALLITHEA	176 71	+30211 999 3000/ +30211 999 3001	A0101, A0201, A0202, A0301,
							A0302, A0401, A0402, A0403,
							A0411, A0501, A0502, A0503,
							A0601, A0603, A0604, A0605,
							A0606, A0607, A0701, A0901,
							A1001, A1002, A1101, A1103,
							A1201, B0101, B0102, B0103,
							B0104, B0201, B0301, B0401,
							B0501, C0203
126.	97-027	INFOGROW	17 M. BOTSARI ST.	LIKOVRISI	141 23	+30210 283 4845/ +30210 283 4863	A0701
127.	04-093	INFONET LTD.	362 SINGROU AVE.	KALLITHEA	176 74	+30210 946 7100/ +30210 946 7149	A1102
128.	97-025	INTELCO	11 THERMOPILON ST.	CHALANDRI	152 33	+30210 689 4610/ +30210 689 4608	A0401, A0402, A0404, A0406,
			& MAKEDONIAS ST.				A0407, A0409, A0411, A0403,
							A0405, A0408, A0410, A0601,
							A0602, A0603, A0604, A0605,
							A0606, A0607, A0701
129.	00-005	INTERCONNECT LTD.	10-16 MINOOS ST.	N. KOSMOS	117 43	+30210 929 6741-2/ +30210 929 6741	A1002, A0701
130.	03-018	INTERGAME	70 GERASIMOU MARKORA ST.	KERKIRA	491 00	+30266 103 6623/ +30266 104 5532	A0101
131.	00-033	INTERNET Q S.A.	17 TRIAS ST.	ATHENS	112 57	+30210 884 1141/ +30210 884 1176	A0401, A0701, A1102, A0201, A0501
132.	99-188	INTERSAT S.A.	362 KIFISSIAS AVE.	CHALANDRI	152 33	+30210 811 8100/ +30210 811 8112	A0301, A0601, A0701, A1001, A0401

No	REG.	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORIZATION
133.	03-027	INTERWORKS	8 IATROU GOGOUSI ST.	N. EFKARPIA	114 76	+30231 068 8186/ +30231 068 8184	A0401, A0405, A0701
134.	99-171	INTRACONNECT S.A.	12 VOUTSA ST.	N. IONIA	142 31	+30210 285 5830/ +30210 285 5839	A0301, A0701, A0101, A0201,
							A0202, A0302, A0401, A0405,
							A0411, A0501, A0502, A0503,
							A0601, A0602, A0603, A0604,
							A0605, A0606, A0607, A0901,
							A1001, A1002, A1101, A1102,
							A1103, A1201
135.	01-273	INTRASTET LTD.	19 MANDILARA ST.	LARISSA	412 22	+30241 028 6609/ +30241 053 4433	A0201, A0603, A0604, A0605,
							A0901,A1002, B0104, C0101
136.	04-072	IRIS MEDIA LTD.	187 THESSALONIKIS ST.	ATHENS	118 52	+30210 342 1641/ +30210 347 6001	A0401, A0402, A0403, A0404,
							A0405, A0406, A0407, A0408,
							A0409, A0410, A0411, A0501,
							A0502, A0503, A0601, A0602,
							A0603, A0604, A0605, A0606,
							A0607, A0701, A1001, A1002,
							A1201, A1202, B0101, B0102,
							B0103, B0104
137.	01-231	ISA LTD.	8 P. TSALDARI ST.	MELISSIA	151 27	+30210 803 7240/ +30210 804 2153	A0101, A0301, A0302, A0409,
							A0601, A0602, A0603, A1001,
							A1002, A1201
138.	95-002	ITEL LTD.	409 VOULIAGMENIS AVE.	ILIOUPOLI	163 46	+30210 979 0050/ +30210 979 0051	A0701, A0401
139.	01-245	IXNET UK LIMITED	63 QUEEN VICTORIA	LONDON-UK	EC4N4ST	+30210 683 7520/ +30210 685 6658	A0601
140.		KAPA-PHONE S.A.	39 CHALANDRIOY AVE.	MAROUSSI	151 25	+30210 610 6006/ +30210 610 6005	A1102
141.	01-252	KARAVANGELIS	10th km DRAMAS-	DOXATON	663 00	+30252 106 8971/ +30252 105 5480	A1102
		DIMITRIOS	KAVALAS				
			NATIONAL ROAD				
142.	96-004	KENDR0	8 X. KARAPANAGIOTI ST.	MITILLINI	811 00	+30225 102 8791/ +30225 104 3150	A0701, A0604
		ILEKTRONIKON					
		IPOLOGISTON					
		(ELECTRONIC					
		COMPUTERS					
110	00.005	CENTER)	05 144 D 4 T 110	MADOUGGI	454.05	20040 200 2004 2004 200 200	1000/
143.	96-025	KENOURGIOS	85 MARATHO-	MAROUSSI	151 25	+30210 802 6506/ +30210 802 6655	A0604
1//	00.010	DIMITRIOS	NODROMOU ST.	THESSAL ONION	F/C 01	00001 005 01/0/ 00001 005 01/0	A1001 A1000
144.	02-012	KINETIX TELE.COM	4 AGN. STRATIOTI ST.	THESSALONICA	546 31	+30231 025 6140/ +30231 025 6140	A1001, A1002
1/5	04, 000	HELLAS LTD. KOSMON LTD.	2 DAIDECTOU CT	N. FILADELFIA	1/2 /1	+30210 259 9900/ +30210 259 9999	VUEUS VUEUV VUEUE VUEUC
145.	U4-U88	NUSMUN LID.	3 RAIDESTOU ST.	IN. FILADELFIA	143 41	+30710 539 9900/ +30710 539 9999	A0603, A0604, A0605, A0606,
							A0607, A0701, A0901, A1001,
							A1002, A1101, A1102, A1201,
							A1202, B0101, B0102, B0103,
							B0104, A0501, A0502, A0503, A0601, A0602
							AUUU1, AUUUZ

No	REG.	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORIZATION
146.	99-205	LAN-NET S.A.	1 KONSTANDI- NOUPOLEOS ST. & KIFISSOY ST.	PERISTERI	121 32	+30210 570 8300/ +30210 570 8322	A0601, A1001, A0101, A0201, A0202, A0302, A0403, A0405, A0501, A0503, A0602, A0603,
							A0604, A0605, A0606, A0901, A1002, A1101, A1102, A1103, A1201, C0101, C0302, C0303, A0301, A0701
147.	01-230	LEMONTEL.COM S.A.	60 LAMBROU KATSONI ST.	ATHENS	114 71	+30210 695 0722/ +30210 699 0809	A0301, A0401, A0402, A0601, A0604, A0605, A0606, A0701, A1001, A1002
148.	98-001	LEXITEL S.A.	BENAKI ST. & AG. NEKTARIOU ST.	CHALANDRI	152 35	+30210 606 9500/ +30210 606 9510	A1102
149.	96-019	LINE COMPUTERS	1-3 P. MELA ST.	FLORINA	531 00	+30238 502 5809/ +30238 504 4170	A0701
150.	00-014	LINK	9th km THESSALONIKIS- THERMIS ROAD	THERMI	570 01	+30231 048 9390/ +30231 048 9394	A0101, A0201, A0302, A0401, A0501, A0502, A0604, A1001, A1002, A1101, A0601, A0701, A0403, A0301
151.	96-012	LINK S.A.	6 M. ALEXADROU ST.	KATERINI	601 00	+30235 107 6916/ +30235 107 6916	A0301, A0401, A0701
152.	00-191	LINX	23-25 ALASTOROS ST.	ATHENS	115 22	+30210 645 1333/ +30210 643 2495	A1001
153.	04-099	MAGMA MULTIMEDIA PRODUCTIONS	95 MERARXIAS ST.	SERRES	621 00	+30232 103 9494/ +30232 109 8845	A0401,A0604,A0701,A0901
154.	04-014	MACEDONIA TELECOM- MUNICATIONS	31 ANDROUTSOU ST.	VERIA	591 00	+30233 107 3294	A0401, A0701, A1001, A1002
155.	01-246	MAKNAN S.A.	57 ALEXANDRAS AVE.	ATHENS	114 73	+30210 647 0350-1/ +30210 647 0352	A1102
156.	01-023	MAMALAKIS IOANNIS S.A.	13 ETHNIKIS AMINIS ST.	THESSALONICA	546 21	+30231 024 4336/ +30231 028 7898	A0101, A0201, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411
157.	01-266	MANIATEAS ILIAS EKDOTIKES EPICHIRISIS S.A. (PUBLISHING)	166 IONIAS AVE.	ATHENS	111 44	+30210 211 4630	A1102
158.	96-007	MBN S.A. MEDITERRANEAN BUSINESS NETWORK	56 AG. IOANNOU ST.	AG. PARASKEVI	153 42	+30210 600 6696/ +30210 639 0565	A0701, A0401
159.	01-251	MCC	13 HEIER ST.	LICHTENAU- ATTELN - DENMARK	D-3316	+49 5292 98630/ +49 5292 2922	A0401, A1102
160.	00-017	MCI WORLDCOM ONE-PERSON LTD. (HELLAS)	35 JOHN KENNEDY ST.	KESSARIANI	161 21	+30210 729 7550/ +30210 720 9495	A0301
161. 162.		MEDIATEL S.A. MEDITERRANEAN NAUTILUS LTD.	10-16 MINOOS ST. INTERNATIONAL HOUSE 3 HARBOURMASTER PLACE	N. KOSMOS IFSC DUBLIN 1 IRELAND	117 43	+30210 929 6121/ +30210 902 8596 +35 314359700/ +35 314359700	A1102 A0101, A0201, A0202, A0301, A0302, A0603, A0604 A0605

No	REG.	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORIZATION
163.	01-002	MEDITERRANEAN	4 ATTHIDON ST.	KALLITHEA	176 71	+30210 955 9050/ +30210 955 9055	A0101, A0201, A0202, A0301,
		BROADBAND					A0302, A0601, A0602, A0603,
		ACCESS S.A.					A0605, A1001
164.	01-287	MEDITERRANEAN	SOKRATOUS ST.	MELISSIA	151 27	+30210 810 2633-5/	A0101, A0201, A0202, A0301,
		NAUTILUS	& 2 KIPROU ST.			+30210 803 0555	A0302, A0501, A0603, A0604,
		GREECE S.A.					A0605, A0901, A1202
165.	98-038	MEGA	30 VAKCHOU ST.	THESSALONICA	546 29	+30231 050 0710-30/	A1102, B0103
		INTERNATIONAL				+30231 054 0520	
		GREECE LTD.					
166.	00-007	MLS INFORMATION	79 NOVEMBER 17 <sup>th</sup> ST.	PILEA	544 54	+30231 092 9090/ +30231 093 7222	A0601, A1001, A0701
		TECHNOLOGY S.A.		THESSALONIKIS			
167.	00-028	MULTICOM S.A.	209 KIFISSIAS AVE.	MAROUSSI	151 24	+30210 614 1106/ +30210 809 7721	A0401, A0101, A0201, A0301,
							A0402, A0403, A0404, A0501,
							A0502, A0503, A0604, A0701,
							A0802, A0901, A1002, A1103
168.	01-235	MULTIDATA S.A.	41-45 MARINOU	N. IRAKLIO	141 21	+30210 270 5340/ +30210 270 5398	A1102, A1103
			ANDIPA ST.				
169.	98-037	MUNICIPALITY	12 NIKOTSARA ST.	SKIATH0S	370 02	+30242 702 2240/ +30242 702 3150	A0701
		OF SKIATHOS					
170.	01-015	M-WEB S.A.	MANIS KANDZA ST.	PALLINI	153 51	+30210 660 2200/ +30210 604 1610	A0201, A0202, A0401, A0604,
							A0701, A1002, A1101, A1102,
							B0102, B0103, B0301
171.	01-018	NEA PILI S.A.	25-29 KARNEADOU ST.	ATHENS	106 75	+30210 725 4464/ +30210 725 4637	A0101, A0201, A0202, A0301,
							A0302, A0401, A0402, A0404,
							A0405, A0407, A0501, A0503,
							A0601, A0602, A0603, A0604,
							A0605, A0606, A0607, A0701,
							A1001, A1002, A1103
172.	99-181	NET CAFÉ	10 SPILIADOU ST.	PREVEZA	481 00	+30268 202 7230	A0701
173.	99-202	NET ONE S.A.	2 PERIKLEOUS ST.	N. PSICHIKO	154 51	+30210 678 1300/ +30210 678 1390	A0301, A0701, A0202, A0601,
							A0401
174.	04-087	NETEX	66 POSIDONOS AVE.	ALIMOS	174 55	+30210 988 5506/ +30210 988 6756	A1102
175.	03-028	NETMODE	1 G. SEFERI ST.	DAFNI	172 34	+30210 970 0099/ +30210 975 6858	A0401, A0701
176.	98-042	NETPLAN	12 SOLOMOU ST.	ATHENS	106 83	+30210 330 0793/ +30210 380 1348	A0701, C0101, C0202, C0204,
							C0205, C0303, C0401, A0401,
							A0101, A0201, A0301, A0302,
							A0501, A0604, A0605, A0901
177.	03-045	NEW GROSS TV	79 KILKIS ST.	POLIKASTRO	612 00	+30234 304 1405/ +30234 302 5616	A0701
		HELLAS S.A.					
178.	96-027	NEWSPHONE	280 THISSEOS AVE.	KALLITHEA	176 75	+30210 947 2222/ +30210 947 2223	A1102
		HELLAS S.A.					
179.	99-180	NIX INTERNET	14 BOUMBOULINAS ST.	ATHENS	106 82	+30210 383 9044-5/ +30210 383 9044	A0701
180.		NONDAS I.N.S.	AVE. DU CONDOR 25	BRUXELLES	10 80	+32 495536988/ +32 974638857	A0101, A0201, A0301, A0601,
							A0602, A0603, A0604, A0605,
							A0606, A0701, A1001, A1002,
							A1201, A0607
181.	01-233	NONDAS I.N.S.	181 DIMOSTHENOUS ST.	KALLITHEA	176 75	+30210 953 7226/ +30210 953 7224	A0101, A0201, A0301, A0601,
		TELECOM					A0602, A0603, A0604, A0605,
							A0606, A0607, A0701, A1001,
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No	REG.	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORIZATION
182.	02-080	NOVA MEDIA ONE-PERSON LTD.	16 FERRON ST.	ATHENS	104 34	+30210 884 1470/ +30210 884 1838	A1102
183.	04-079	NOVATEX	6 DIM. KARAOLI ST.	THESSALONIKA	551 31	+30231 042 6547/ +30231 042 6547	A1102,B0103,A0901
184.		OK S.A.	148 DOIRANIS ST.	KALLITHEA		+30210 953 1600/ +30210 957 8784	A0701, A0901, A1002, A1101
185.		OLIMBOS NET LTD.	14 P. TSALDARI ST.	KATERINI		+30235 107 7316/ +30235 107 7576	A0701
186.		OMEGANET S.A.	3 FRAGOKLISSIAS ST.			+30210 610 6060/ +30210 618 0579	A0701. A0401
187.		OMILOS KALOFOLIA S.A.	39 CHALANDRIOU AVE.			+30210 610 6006/ +30210 610 6005	A0401, A0301, A0302, A0604, A0701
188.	04-025	OMNINET	42 SAPFOUS ST.	KALLITHEA	176 76	+30210 953 6360/ +30210 953 6362	A0201, A0202, A0401, A0402, A0403, A0404, A0405, A0406, A0407 A0408, A0409, A0410 A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0901, A1001, A1002, A1101, A1102, A1103
189.	99-190	ORGANOTIKI COMPUTERS & CO	30 TANDALOU ST.	THESSALONICA	546 29	+30231 053 3694/ +30231 055 1385	A0701,A0401
190.	01-302		1 PERGAMOY ST.	N. FILADELFIA	143 41	+30210 258 8695/ +30210 253 3734	A1101, A1102, A1103
191.	95-001	OTE S.A.	99 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 611 5011/ +30210 611 7456	A0101, A0201, A0301, A0302, A0303, A0401, A0402, A0403, A0405, A0406, A0410, A0501, A0503, A0604, A0605, A0606, A0801, A0802, A0803, A0901, A1001, A1101, A1102, A1103, A1201, B0101, B0102, B0201, B0301, C0101, C0201, C0202, C0203, C0204, C0205, C0301, C0402, C0403, C0501, A1301
192.	02-029	OTEGLOBE S.A.	99 KIFISSIAS AVE.	MAROUSSI	151 24	+30210 611 5400/ +30210 611 5399	A0101, A0201, A0202, A0301, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0605, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0801, A0802, A0803, A0901, A1001, A1002, A1101, A1102, A1103, A1201
193.	96-023	OTENET S.A.	56 KIFISSIAS AVE. & DELFON ST.	MAROUSSI	151 24	+30210 615 1600/ +30210 615 1700	A0201, A0202, A0301, A0401, A0409, A0602, A0603, A0604, A0605, A0701, A0901, C0204, A0501, A1002, A1101, A1103, A0407, A0101, A0601, A1001
194.	04-028	OTESAT-MARITEL	8 EGALEO ST.	PIRAEUS	185 45	+30210 459 9500/ +3210 549 9600	A0101, A0202, A0301, A0303, A0401, A0402, A0501, A0601,

No	REG.	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORIZATION
							A0602, A0603, A0605, A0701,
							A1002, A1101, B0103, B0104,
							C0101, C0203, C0204, C0301,
							C0302, C0303
195.	01-228	OUTSOURCE S.A.	3 FOKEAS ST.	PIRAEUS	185 47	+30210 489 9320-3/	A0101, A0201, A0202, A0401,
						+30210 489 9184	A0701
196.	01-011	PALITSKARIS XENOFON	18 20 <sup>th</sup> OCTOBER ST.	GIANNITSA	581 00	+30238 208 3200/ +30238 202 3733	A0401, A0604, A0701
197.	01-014	PANATEL S.A.	294 SINGROU AVE.	KALLITHEA	176 73	+30210 957 6625/ +30210 957 8750	A0301, A0603, A0604, A0607,
							A1001, A1002, A1101, A1102,
							A1201
198.	01-013	PAPASINNEFAKIS ATHANASIOS	25 SKOUFA ST.	ELASSONA LARISSAS	402 00	+30249 302 2120	A1102
199.	96-013	PAPAVASILIOU E. & A. LTD.	7 PLASTIRA ST.	KARDITSA	431 00	+30244 107 5344/ +30244 107 2344	A0701, A0401
200.	01-294	PETROULAKIS G. S.A.	1" km FILIRO-LAGADA ROAD  11 ALEXANDRAS AVE.	FILIRO	114 73	+30231 067 8451/ +30231 067 8454	AO101, AO201, AO301, AO302, AO303, AO401, AO402, AO403, AO404, AO405, AO406, AO407, AO408, AO409, AO410, AO411, AO501, AO502, AO503, AO601, AO602, AO603, AO604, AO605, AO606, AO607, AO701, AO801, AO802, AO803, AO901, A1001, A1002, A1101, A1102, A1103, A1201, A1202, B0101, B0102, B0103, B0104, B0201, B0301, B0401, B0501, C0101, C0202, C0203, C0204, C0205, C0301, C0302, C0303, C0401, C0402, C0403  AO301, AO601, AO701, A1001, A1002, A1101, A1102, A1101, A1102, A1103,
วกว	99-162	PG COM	30 AMIKLON ST.	CHALANDRI	152 31	+30210 674 6777/ +30210 674 6446	A1201, B0601 A0701
	04-109		50 TSILLER ST.	ATHENS	111 44	+30210 212 9771/ +30210 212 9620	A1102
204.	01-288	PLANET LINE	80 KIPROU ST.	LARISSA	412 22	+30241 053 3193	A0401, A0901, A1102
205.	01-008	POLIGRAMMO DIKTIO S.A.	100 KIFISSIAS AVE. & 83 MARATHONO- DROMOU ST.	ATHENS	151 25	+30210 614 4226/ +30210 614 4231	A0701, A1001, A1002, A1101, A1102, A0301
206.	00-034	POWERNET	41-45 MARINOU ANDIPA ST.	N. IRAKLIO	141 21	+30210 270 5300/ +30210 270 5399	A0701
207.	02-062	PREMIUM SERVICES HELLAS ONE- PERSON LTD.	15 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 689 6761/ +30210 689 6762	A0101, A0201, A0301, A0302, A0401, A0402, A0403, A0404, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0901, A1001, A1002, A1101, A1102, A1201

No	REG.	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORIZATION
208.	02-070	PRIMUS CALL S.A.	159 G. PAPANDREOU ST.	METAMORFOSI	144 52	+30210 288 8885/ +30210 288 8886	A1102
209.	01-259	PRIORITY LTD.	19 PENDELIS AVE.	VRILISSIA	152 35	+30210 683 5876/ +30210 683 5895	A0201
210.	98-035	PRISMA ELECTRONICS S.A.	85 DIMOKRATIAS AVE.	ALEXANDROUPOLI	681 00	+30255 103 5013/ +30255 103 4916	A0701, A0401
211.	01-283	PROTO PANGOSMIO DIKTIO TILEFONIAS- INTERNET	16 DIOMIDOUS KIRIAKOU ST.	KIFISSIA	145 62	+30210 808 9102/ +30210 808 9103	A1002
212.	03-013	R.G. COMMUNI- CATIONS S.A.	34 VERANTZEROU ST.	ATHENS	104 32	+30210 899 6516/ +30210 899 6519	A1102, A1201, B0103, B0104, A0101, A0201, A0301, A0302, A0401, A0402, A0403, A0404, A0411, A0501, A0502, A0503, A0601, A0602, A0603, A0604, A0605, A0606, A0607, A0701, A0901, A1001, A1002, A1101
213.	98-006	RAINBOW COMMUNICATIONS	75 ILIA ILIOU ST.	ATHENS	117 44	+30210 901 2892/ +30210 901 2540	A0604, A0701
214.	04-110	RAMNET S.A.	80 MICHALAKO- POULOU ST.	ATHENS	115 28	+30211 365 7831/ +30211 365 9541	A0301,A0401,A0701
215.	03-020	SMT S.A.	159 G. PAPANDREOU ST.	METAMORFOSI	144 52		A1102
216.	00-012	SANYOCOM S.A.	12th km ATHENS- LAMIA RD.	METAMORFOSI	144 51	+30210 289 4600/ +30210 289 4672	A0301, A0403, A0701, A0202, A0601
217.	01-304	SAVVIS EUROPE B.V.	17 VALAORITOU ST.	ATHENS	106 71	+30210 369 2800/ +30210 369 2807	A0202, A0301, A0605, A0701, A0201
218.	02-031	SEND IT S.A.	53 AG. IOANNOU ST.	AG. PARASKEVI	153 42	+30210 608 4860/ +30210 608 4861	A1102, B0103
219.	02-066	SERVICE 800 – TELEPERFORMANCE	330 THISSEOS AVE.	KALLITHEA	176 75	+30210 940 3373/ +30210 940 3383	A1102
220.	97-017	SITA	SOFOKLEOUS ST. & 101 RIZOUNDOS ST.	ELLINIKO	167 77	+30210 969 6096/ +30210 969 6030	A0605, B0501, A0301, A0601, A0604, A0401 A0402, A0403, A0409, A1002
221.	99-165	SOFT-HARD	21 MARCH 25 <sup>th</sup> ST.	PTOLEMAIDA	501 00	+30246 302 2450	A0701, A0401
222.	00-029	SPACE LINE S.A.	89 D. GOUNARI ST.	MAROUSSI	151 25	+30210 802 9959/ +30210 802 6324	A1102
223.	97-008	SPACENET S.A.	312 MESOGEION AVE.	AG. PARASKEVI	153 41	+30210 650 4244/ +30210 650 4388	A0701, A0601, A0201, A0202, A0404, A0605, A0901, B0301, C0301
224.	95-003	SPARKNET S.A.	40 MARINOU ANDIPA ST.	THESSALONIKA	570 01	+30231 047 1222/ +30231 047 6333	A0701,A0401, A0405, A0411, A0604, A0605, A0901, A0101, A0201, A1002
225.	98-019	STARCOM S.A.	12 FORMIONOS ST.	ATHENS	116 34	+30210 729 2980/ +30210 729 7757	A0403, A0601, A0701, A1001, A0201, A0202, A0301, A0603
226.	99-179	STARGATE NETWORKS S.A.	3 XANTHOU ST.	GLIFADA	166 75	+30210 898 5200/ +30210 898 5201	A0401,A0701
227.	99-198	STSNET S.A.	1st km IRAKLIOU- MOIRON NATIONAL ROAD	IRAKLIO CRETE	711 10	+30281 026 3300/ +30281 026 3300	A0301, A0302, A0303, A0401, A0402, A0403, A0404, A0405, A0406, A0407, A0408, A0409, A0410, A0411, A0501, A0502, A0503, A0601, A0602, A0603,

No	REG.	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORIZATION
							A0604, A0605, A0606, A0607,
							A1001, A1002, A1101, A1102,
							A1103, A1201, A1202, A0101,
							A0201, A0701
228.	04-066	STUDIO PSK	115 EKTOROS ST.	ILION	131 22	+30210 262 3012/ +30210 262 3381	C0203
229.	02-074	TARGET LINE	8 ALEXANDRAS AVE.	ATHENS	106 82	+30210 821 9074/ +30210 822 5381	A1102
230.	01-241	TARGET LTD.	2 IRODOU ATTIKOU ST.	THESSALONICA	546 25	+30231 055 3621/ +30231 054 6481	A0701, A1102
231.	04-041	TECHNICAL	4 KAR. SERVIAS ST.	ATHENS	102 48	+30210 329 1200/ +30210 322 1772	A0201, A0401, A0701
		CHAMBER OF GREECE					
232.	96-010	TECHNIKES	2-4 ILIOUPOLEOS ST.	IMITTOS	172 37	+30210 979 2500/ +30210 979 2528	A0701
		EKDOSIS S.A.	& KASSIOPIS ST.				
233.	02-047	TECHNOPOLIS S.A.	2-4 ILIOUPOLEOS ST.	IMITTOS	172 37	+30210 979 2500/ +30210 979 2528	A0701, B0103
234.	99-149	TELCOMAT S.A.	178 PAPAFI ST.	THESSALONICA	544 53	+30231 090 0517/ +30231 091 5504	A0701, A0401
235.	99-177	TELECOM	VIA DI MACCIA	ROMA	125	+39 06 36881/ +39 0636885201	A1001, A0201
		ITALIA S.P.A.	PALOCCO 223				
236.	04-013	TELECOM PLUS	44 IPPOKRATOUS ST.	ATHENS	106 80	+30210 363 9980/ +30210 363 4190	A0601, A0602, A0603, A0604,
							A0606, A0607, A1001, A1002,
							A1101, A1102, A1103
237.	96-011	TELEDATA COMMUNICATIONS	4 AMALIADOS ST.	AMBELOKIPI	115 23	+30210 646 2254/ +30210 646 2254	A0301
238.	99-186	TELEDOME S.A.	10 FILARETOU ST.	KALLITHEA	176 72	+30210 956 9277/ +30210 956 3882	A0101, A0501, A0502, A0503,
			& DOIRANIS ST.				A0603, A0604, A0605, A0606,
							A0607, A0801, A0802, A0803,
							A0901, A1002, A1101, A1102,
							A1103, A1201, B0101, B0102,
							B0103, B0104, B0201, B0301,
							B0401, B0501, A0302, A0401,
							A0602, C0101, A0601, A0710,
							A1001, A0201, A0202, A0301,
							A0403
239.	99-189	TELEPASSPORT	29 AMAROUSIOU ST	ATHENS	151 25	+30212 000 9000-9999/	A0401, A0402, A0403, A0601,
		(HELLAS) S.A.	CHALANDRIOU AVE.			+30212 000 9009	A1001, A1002, A1101, A0101,
			& K. KARAMANLI ST.				A0201, A0202, A0302, A0602,
							A0603, A0604, A0606, A0901,
							A1201
240.	04-008	TELEPLANET	65 SEPTEMVRIOU 3rd	ATHENS	164 51	+30210 884 6400-2-3/	A0401, A0503, A0606, A1001,
		INTERNATIONAL	ST.			+30210 884 6401	A1002, A0607, A1102, A1201,
							B0103
241.	01-026	TELESTAND S.A.	18 SOLONOS ST.	ATHENS	106 71	+30210 360 1436/ +30210 360 1474	A0101, A0201, A0301, A0401,
							A0402, A0403, A0404, A0405,
							A0406, A0407, A0408, A0409,
							A0410, A0411, A0501, A0502,
							A0503, A0601, A0602, A0603,
							A0604, A0605, A0606, A0607,
							A0701, A0801, A0802, A0803,
							A0901, A1001, A1002, A1101,
							A1102, A1201, B0101, B0102,

No	REG.	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORIZATION
							B0103, B0104, B0301, G0101,
							C0201, C0202, C0203, C0204,
							C0205, C0301, C0302, C0303
242.	01-004	TELLAS	1A & 3 NEAPOLEOS ST.	MAROUSSI	151 23	+30210 811 3411/ +30210 811 3454	A0101, A0201, A0202, A0301,
							A0302, A0403, A0405, A0407,
							A0501, A0502, A0503, A0601,
							A0602, A0604, A0605, A0606,
							A0607, A0901, A1001, A1002,
							A1101, A1102, A1103, A1201,
							A0701
243.	01-256	TESAE S.A.	26 CHLOIS ST.	ZOGRAFOU	157 72	+30210 748 8705/ +30210 778 0490	A0401, A0402, A0403, A0404,
							A0405, A0406, A0407, A0408,
							A0409, A0410, A0411, A0901,
							A1001, A1002, C0301, C0302,
							C0303, A0701
244.	98-027	THESSALIA ON LINE	91 S. SPIRIDI ST.	VOLOS	382 21	+30242 102 0760/ +30242 103 3291	A0604, A0701
245.	96-016	THESSALIKI TILEMATIKI	26 ASKLIPIOU ST.	TRIKALA	421 00	+30243 107 5758/ +30243 107 5759	A0701
246.	01-292	THUNDERTEL S.A.	34 FRATZI	N. KOSMOS	117 45	+30210 900 8400/ +30210 924 9568	A0201, A0301, A0302, A0402,
			AMVROSIOU ST.				A0601, A0602, A0603, A0604,
							A0605, A0606, A1001, A1002,
							A1101, A0401, A0701, A1102
247.	92-002	TIM HELLAS	66 KIFISIAS AVE.	MAROUSSI	151 25	+30210 615 8000/ +30210 610 9622	A0202, A0701, A1001, A0101,
							A0201, A0401, B0102, B0103,
							B0104, B0401
248.	02-018	TRANSET  COMMUNICATIONS S.A.	3-5 FILODAMIAS ST.	ATHENS	104 42	+30210 515 7347-354/ +30210 515 7654	A1102
249.	03-021	TSOLAKIS	79-81 SOKRATOUS ST.	ATHENS	104 32	693 473 3580	A1102
	00 021	D. KOMNINOS	70 01 001110 11 000 01.	7,1112110	10402	300 470 0000	71102
250.	00-004	UNITEL HELLAS S.A.	152 SEVASTOUPOLEOS	ATHENS	115 26	+30210950 4780/ +30210 950 4781	A0301, A0701, A0401, A0403,
			ST.				A0404, A0406, A0408, A0410,
							A0202, A0601, A1001, A0402,
							A0405, A0407, A0409, A0411
251.	99-185	URNET SYSTEMS S.A.	112 EL. VENIZELOU ST.	ILI0UP0LI	163 45	+30210 992 2922/ +30210 992 3720	A0701, A0301, A0401, A0604,
							A0901, A1002
252.	00-016	UUNET HELLAS	35 JHON. CENNEDY ST.	KESARIANI	161 21	+30210 725 2204/+30210 721 7420	A0601, A1103, A0701, A0101,
		INTERNET SERVICE	& IMITTOU ST.				A0201, A0202, A0301, A0302,
000	00.001	PROVIDER M. LTD.	O LANIA DI CT	DIDAFUE	105.00	00010 /50 0050 5/	A1001, A1002
253.	00-021	VALKANIKI	8 KANARI ST.	PIRAEUS	185 38	+30210 459 9076-7/	A0301, A0701, A0601, A1001
2F/	00 102	TILEPIKINONIAKI LTD.		VEDIA	E01 00	+30210 459 9078	A0701 A0701
254.		VERGINA NETWORK	12 MITROPOLEOS ST.	VERIA		+30233 102 3202/ +30233 106 0007	A0701, A0401
255.	04-022	VESTRAM ONE-PERSON LTD.	21 MIKONOU ST.	ILIOUPOLI	103 40	+30210 975 3119/ +30210 975 6456	A0401, A0701, A1102, B0103
	01 015		29-31 DERIGNY ST.	ATHENS	10/. 3/.	+30210 889 3700/ +30210 889 3701	A0201. A0301. A0302. A0401.
256	111-1117	TITUDI	23-31 DEINIGINI 31.	AIIILINO	104 34	T-50210 003 3700/ #30210 003 3701	AU201, AU301, AU302, AU401,
256.	01-017		& 18 FI PIDOS ST				ΔΛώΛ3 ΔΛΈΛ1 ΔΛΈΛ2 ΔΛΈΛ3
256.	01-017	COMMUNICATIONS	& 18 ELPIDOS ST.				A0403, A0501, A0502, A0503,
256.	UI-UI7		& 18 ELPIDOS ST.				A0403, A0501, A0502, A0503, A0601, A0602, A0604, A0605, A0606, A1001, A1002, A1101,

No	REG.	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX	SERVICES UNDER THE GENERAL AUTHORIZATION
257.	01-247	VIZZAVI	56 KIFISSIAS AVE.	MAROUSSI	151 25	+30210 617 3202/ +30210 617 3274	A1102, A0401, A0701, A0901,
		(HELLAS) S.A.	& DELFON ST.				A1002, A1101, B0102, B0103,
		,					B0104, B0201, C0301, C0303
258.	92-001	VODAFONE S.A.	1-3 TZAVELLA ST.	CHALANDRI	152 31	+30210 670 2000/ +30210 670 3200	B0602, B0603, B0604, A0202,
							A0301, A0601, A0701, A1001,
							A0101, A0201, A0604, B0103,
							B0301, B0401, A1102
259.	02-027	VOICE WEB	40 AG. KONSTANDINOU	MAROUSSI	151 24	+30210 619 6775/ +30210 617 8140	A0601, A0602, A0603, A0604,
			ST.				A0605, A0606, A0607, A1101,
			(ETHRIO, PLAZA,				A1102, A1103, B0102, B0103,
			OFFICE A37)				B0104
260.	99-169	VOICENET	5 PROFITI ILIA SQ.	ATHENS	116 35	+30210 757 3100/ +30210 757 3111	A0301, A0403, A0601, A0701,
							A0101, A0201, A0503, A0605,
							A0606
261.	99-187	WEB COM-	64 MOUTALASKI ST.	N.IONIA	142 34	+30210 272 0006/ +30210 271 4008	A0403, A1001, A1002, A1101,
		MUNICATIONS LTD.					A1102, A1103
262.	98-024	WEST NET S.A.	17 GEROCOSTOPOULOU ST.	PATRA	262 21	+30261 062 4070/ +30261 062 3955	A0701, A0401
263.	00-008	WESTRA COM	39 PERIKLEOUS ST.	CHOLARGOS	155 61	+30210 653 5522/ +30210 654 6886	A0701, A0101, A0201, A0301,
		INFOCIENCE					A0302, A0303, A0401, A0402,
							A0403, A0404, A0405, A0406,
							A0407, A0408, A0409, A0410,
							A0411, A0501, A0502, A0503,
							A0601, A0602, A0603, A0604,
							A0605, A0606, A0607, A0801,
							A0802, A0803, A0901, A1001,
							A1002
264.	01-016	WIRELESS GR	48 ERECHTHIOU ST.	ALIMOS	174 55	+30210 960 0621/ +30210 964 8677	A0701
265.	01-282	WORLD STATE LINE M. LTD.	90 CHR. SMYRNIS ST.	MOSCHATO	183 45	+30210 941 1150/ +30210 948 4150	A0201, A1001, A1002, A1102
266.	00-022	WWA	2 ERGATON TIPOU ST.	ILIOUPOLI	163 46	+30210 995 9063/ +30210 995 9064	A0301, A0601, A0701, A0401,
							A1001, A1002, A1101

# **APPENDIX IV.**

## **Codification of Telecommunications Services**

	A	. CLAS	SES OF FIXED TELECOMMUNICATIONS SERVICES
A01.	Provision of Fixed Network	A0101	Provision of fixed network transmission lines (leased Lines) to the public, via
	Transmission (excluding		(entirely or in part) a network infrastructure owned and/or managed by the declarant
	Satellite Transmission Lines)		
A02.	Capacity Leasing	A0201	Leasing of capacity to the public, via (entirely or in part) a network infrastructure owner
			and/or managed by the declarant
		A0202	Provision of Private Virtual Network (PVN) to the public, via (entirely or in part)
			a network infrastructure owned and/or managed by the declarant
A03.	Data Transmission Services	A0301	Packet-switched data transmission
		A0302	Circuit-switched data transmission
		A0303	Telex service without allocation of numbers under the NNP
A04.	Value-Added Data Services	A0401	Electronic mail (e-mail)
		A0402	Electronic Data Interchange (EDI)
		A0403	Value-added facsimile service
		A0404	Accounting services/ Electronic Funds Transfer (EFT)
		A0405	Remote control services
		A0406	Teletex
		A0407	Videography services
		A0408	Telewriting services
		A0409	Teleprocessing services
		A0410	Telegraphy services
		A0411	Telemetry services
A05.	Integrated Value-Added Services	A0501	Videoconference
		A0502	Business TV
		A0503	Viewphone
A06.	Network Management Services	A0601	Network operation for Closed User Groups, including the provision of general
			telecommunications services (Including voice switching)
		A0602	Network operation for Closed User Groups, including the provision of general
			telecommunications services (Excluding voice switching)
		A0603	Provision of gateways between networks belonging to different parties
		A0604	Network access services, e.g. for access to networks of mailbox providers, on-line
			information service and/or Internet Service Providers
		A0605	Network support services
		A0606	Intelligent Network (IN) services
		A0607	Automatic Call-back services
A07.	Internet Services	A0701	Provision of Internet services
A08.	Technical Provision of Broadcasting	A0801	Transmission of audio and/or TV signals between installations
			Services of Broadcasting Companies
		A0802	Relaying of Broadcasting signals
		A0803	Distribution of Broadcasting signals - via terrestrial relay stations - via cable networks

	A. CLASSES OF FIXED TELECOMMUNICATIONS SERVICES							
A09.	Technical Provision of	A0901	Provision of multimedia services					
	Multimedia Services							
A10.	Voice Services	A1001	Voice Telephony services for the public, via (entirely or in part) a network					
			infrastructure owned and/or managed by the declarant, without allocation of numbers					
			under the NNP					
		A1002	Voice services provided via the Internet					
A11.	Value-Added Voice Services	A1101	Voice mailbox					
		A1102	Audiotex					
		A1103	Audioconference services					
A12.	Public Telecommunications Stations	A1201	Provision of public phones					
		A1202	Other telecommunications stations					
A13.	Other Telecommunications Services							

	B. CLASSES OF MOBILE RADIO COMMUNICATIONS SERVICES						
B01.	Mobile Voice Services	B0101	Voice transmission for the public, without allocation of numbers under the NNP				
		B0102	Facsimile and data transmission				
		B0103	SMS (Short Messaging Service)				
		B0104	Mailbox Services				
B02.	Radio Call Services	B0201	Unidirectional transmission of news (sound, drawings and/or text)				
B03.	Radiocommunications Services	B0301	Voice and data transmission for Closed User Groups				
	for Closed Users Groups						
B04.	Mobile Radio Data Services	B0401	Packet-switched data transmission				
B05.	In-flight Telephony Services	B0501	Voice, data and facsimile transmission				
B06.	Other Telecommunications Services						

	C. CLASSES OF SATELLITE SERVICES						
C01.	Provision of Satellite Transmission	C0101	Provision of Satellite Transmission Lines to the public, via (entirely or in part)				
	Lines		a network infrastructure owned and/or managed by the declarant				
C02.	General Satellite Services	C0201	Broadcasting Distribution services				
		C0202	Business TV				
		C0203	Satellite News Gathering				
		C0204	Data Transmission services				
		C0205	Videoconference				
C03.	Mobile Satellite Services	C0301	Fleet Management/ Position-Finding services				
		C0302	Telephony services				
		C0303	Data services				
C04.	Satellite Broadcasting Services	C0401	Transmission of audio and TV signals between Broadcasting Stations				
		C0402	Transmission of broadcast signals				
		C0403	Distribution of broadcast signals				
C05.	Other Telecommunications Services						

	EXPLANATIONS
A0101	The telecommunications means-facilities that offer capacity for transparent transmission between terminal points of the network,
	without offering optional switching capabilities (switching operations that may be controlled by the user as part of the leased line).
A0201	Leasing to the public of a part of the capacity of telecommunications lines, via (entirely or in part) a network infrastructure owned
	and/or managed by the declarant.
A0202	Provision of a Private Virtual Network via (entirely or in part) a network infrastructure owned and/ or managed by the declarant.
	Private Virtual Network is the section of the corporate network that provides network services using common switching network
	infrastructure.
A0301	Packet-switched transmission of digital information using specific standards, such as X.25, FPS (Fast Packet Switching) etc.
A0302	Circuit-switched transmission of digital information using specific standards, such as X.21.
A0303	Telegraphic service allowing direct temporary communication between subscribers, using a start-stop device and
	telecommunications circuits of the public telecommunications network.
A0402	Transmission of digital information using EDI standards.
A0403	Transmission of information stored in a database, using retrieval from the memory and automated mass-transmission.
A0404	Transmission of data for processing transactions between computers supporting running general accounting applications,
	as well as between computer systems supporting electronic payments (e.g. clearing systems etc.).
A0405	Transmission of data for remote control, tele-monitoring and remote diagnosis (excluding services for remote control
	of the operation of telecommunications networks/systems through private usage switchers).
A0406	Telematic service for transmission of text, offering additional facilities compared to the telex service and, more specifically, typing
	and remote text processing functions.
A0407	Telecommunications form in which information (generally in the form of digital data) is transmitted primarily in order to allow its
	selection and display to the user, in the form of text or image, using a visual display unit such as a TV monitor.
A0408	Telecommunications service having as its purpose to transmit and simultaneously regenerate graphics in a remote terminal, in the
	form in which they had been written or designed in the sending terminal.
A0409	Service that combines telecommunications techniques with data processing techniques, with the aim to remotely process
	information.
A0410	Telecommunications service in which the information transmitted is intended to be recorded, upon reception, as a graphics string.
	The information transmitted may sometimes be displayed in an alternative format or may be stored for future use.
A0411	Procedure in the context of which measurements take place at remote locations and the results are transmitted via
	telecommunications networks.
A0501	Teleconferencing service, where the participants are connected via circuits allowing the transmission of fully moving image, voice,
	text and data.
A0502	Broadband transmission of audio and TV signals to Closed User Groups (e.g. for educational purposes).
A0503	Service combining telephony techniques with TV techniques, allowing users to see each other during their telephone communication.
A0601	Operation and management of telecommunications networks for Closed User Groups, including voice switching capabilities.
A0602	Operation and management of telecommunications networks for Closed User Groups, without voice switching capabilities.
A0603	Provision of gateways, in order to achieve interconnection between networks belonging to different parties.

	EXPLANATIONS
A0604 F	Provision of gateways in networks, e.g. networks of voice mailbox providers, on-line information service providers and Internet
	providers (including the services provided in these networks, such as e-mail, fax, etc.).
A0605 1	Transmission of data for remote control, tele-monitoring, remote diagnosis and support of telecommunications networks
c	or systems.
A0606	Network services, provision of which requires Intelligent Network features and functionalities
(	(e.g. the called party assumes payment of telephone charges, etc.).
A0607 F	Provision of (international) connections using the automatic call-back method.
A0701 S	Services that are provided via the Internet and do not belong to any of the other classes described above.
A0801 T	Transmission of audio and/ or TV signal between Broadcasting Companies, via external transmission and distribution lines,
a	as well as via programme exchange lines.
A0802 1	Transmission of audio and TV signals from the radio or TV station to the broadcasting distribution networks.
A0803 [	Distribution of broadcasting signals to subscribers, via broadcasting distribution networks using cable networks and/or terrestrial
r	relay stations.
A0901 1	Transmission and management of multimedia services via telecommunications networks. Multimedia services include teleshopping,
t	tele-education, video-on-demand, pay-per-view or similar services.
A1001 F	Real-time voice transmission and/or switching, via (entirely or in part) a network infrastructure owned and/or managed
k	by the declarant, without allocation of numbers under the NNP (including the provision of general facsimile services).
A1002 \	Voice services provided via the Internet and without allocation of numbers under the NNP.
A1101 F	Provision of voice memory, where voice mail may be deposited and retrieved.
A1102 F	Provision of technical infrastructure for retrieval of information and entertainment programmes via a specific call number.
A1103 1	Teleconferencing service, where the participants are connected via circuits supporting the transmission of voice. In addition to voice,
c	other signals (such as facsimile or telewriting) can also be transmitted.
A1201 F	Provision of public phones (including provision of general facsimile services).
A1202 F	Provision of other telecommunications stations.
B0101 F	Real-time voice transmission and/or switching, via (entirely or in part) a mobile telephony network infrastructure owned and/or
r	managed by the declarant, without allocation of numbers under the NNP. Call forwarding is through cellular analogue or digital
t	terrestrial radio networks and points providing interconnection with public fixed networks.
B0102 F	Facsimile services (printed or computer-generated fax) and data transmission services.
B0103 1	Transmission of short messages (up to 160 alphanumeric characters).
B0104 F	Provision of voice memory.
B0201 A	Analogue and digital transmission of signal, which introduces sound series or alphanumeric characters to mobile receivers.
B0301 A	Analogue or digital transmission of voice and data to a restricted user group. Transition to a fixed network is one option.
B0401 1	Transmission of digital information by packet switching via virtual connections, using specific standards (e.g. X.25) on a mobile data
r	radio network. Transition to a fixed network is possible.
B0501 \	Voice, data and facsimile communications with fixed and mobile networks, for passengers of airborne vehicles, via terrestrial radio
s	stations.

	EXPLANATIONS
C0101	The telecommunications means-facilities that offer capacity for transparent transmission between terminal points of the satellite
	network, without offering optional switching capabilities (switching operations that may be controlled by the user as part of the
	leased line).
C0201	Unidirectional data transmission in the form of point-to-multipoint connections.
C0202	Broadband transmission of audio and TV signals to one or more receiving stations of a selected group of users.
C0203	Transmission of video from the location where it takes place to a TV studio, via mobile satellite transmission systems.
C0204	Provision of unidirectional or interactive data transmission paths to the installations of subscribers, via satellite systems.
C0205	Teleconferencing service, where the participants are connected, via suitable satellite links, for the transmission of fully moving
	image, voice, text and data.
C0301	Transmission of alphanumeric data and information between a central station and moving units (vehicles) and radiolocation.
C0302	Real-time voice transmission and/or switching, via analogue and/or digital satellite networks.
C0303	Data transmission and/or switching via analogue and/or digital satellite networks.
C0401	Transmission of audio and TV signals between broadcasting station, via satellite links.
C0402	Transmission of broadcast signals from the broadcasting station to the corresponding broadcasting distribution satellites.
C0403	Distribution of broadcast signals for direct satellite reception by broadcasting subscribers.

# **APPENDIX V.**

## List of Undertakings Licensed to Provide Postal Services

(as in force on 31 December 2004)

	A. INDIVIDUAL LICENCES									
A.A.	REG.NO.	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX			
1.	04-031	DELTA POST S.A. EMBORIAS GENIKIS	DELTA POST S.A.	8 VOURNAZOU ST.	ATHENS	115 21	+30210 642 4100			
		DIAFIMISIS & TACHIMETAFORON								
2.	99-150	HELLENIC POST	ELTA	1 APELLOU ST.	ATHENS	101 88	+30210 335 3246/ +30210 335 3250			
3.	99-125	METROPOLITAN COURIERS LTD.	METROPOLITAN COURIERS LTD.	1-3 AFRODITIS ST.	KALLITHEA	176 72	+30210 959 4461			

	B. GENERAL AUTHORIZATIONS										
A.A.	REG.NO.	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX				
1.	01-207	A. PAPAZOGLOU & CO	A. PAPAZOGLOU & CO	88 OCTOBER 23 <sup>rd</sup> ST.	LARISSA	412 23	+30241 023 9828/ +30241 023 7534				
2.	04-012	A. IOANNOU- K. SIETOS LTD.	IST COURIER	7 SIDORAS ST.	ILION	131 21	+30210 262 7602/ +30210 262 7602				
3.	03-017	A. IORDANOU - A. KALOUDI LTD.	TAXIDEMA-COURIER- CARGO-LOGISTICS	106 AG. ELEOUSIS ST.	MAROUSSI	151 25	+30210 805 6550/ +30210 805 6553				
4.	99-122	ACS INTERNATIONAL TRANSPORTATIONS & FACILITIES S.A.	ACS S.A.	25 ASKLIPIOU ST.	KRIONERI ATTIKIS	145 68	+30210 819 0000, +30210 819 0100/ +30210 819 0261				
5.	04-034	ADAMOPOULOU K. ATHANASIA & CO	CITY LETTERS	7 VLASTOU ST.	ATHENS	111 43	+30210 211 3061/ +30210 211 3061				
6.	04-101	ADRIANA BAGLANI ONE-PERSON LTD.	TAXY ASPIS	16 IPPODROMOU SQ.	THESSA- LONICA	546 21	+30231 028 1999/ +30231 028 1899				
7.	01-223	AFOI LAMBROUSI- K. SKARGIOTIS & CO	AFOI LAMBROUSI- K. SKARGIOTIS & CO	155 DODONIS ST.	IOANNINA	452 21	+30265 104 5035,9450/ +30265 106 6144				
8.	04-096	AGALLOS P. KONSTANDINOS	AGALLOS P. KONSTANDINOS	85 CHALKIDIKIS PARODOS	CHALKIDA	341 00	+30222 106 1392/ +30222 106 1392				
9.	99-074	ALAMANOU G. MARIA	RABBIT COURIER	3 ARGOSTOLIOU ST.	ATHENS	113 62	+30210 884 0647/ +30210 882 6255				
10.	01-213	ALATERA VASILIKI	ALATERA VASILIKI	MIRINA ST.	LIMNOS	814 00	+30225 402 4081/ +30225 402 4143				
11.	02-024	ANASTASSAKI NIKI	ANASTASSAKI NIKI	2 DAGRE ST.	ARGOS	212 00	+30275 102 3855/ +30275 106 3252				
12.	04-048	ANGELOPOULOU THEODORA	ANGELOPOULOU THEODORA	4 GRIGORIOU E' ST.	TRIPOLI	221 00	+30271 023 3839/ +30271 023 3839				

A.A.	REG.NO.	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
13.	02-007	APOSTOLIDIS	APOSTOLIDIS	KILA	KOZANI	501 00	+30246 103 9806/
		IOANNIS	IOANNIS				+30246 102 3811
14.	99-130	ARAMEX (HELLAS)	ARAMEX (HELLAS)	34 VOULIAGMENIS	ARGIROUPOLI	164 52	+30210 995 8950/
		INTERNATIONAL	INTERNATIONAL S.A.	AVE.			+30210 995 8849
		TRANSPORTATION S.A.					
15.	99-135	ASSOI COURIERS	OI ASSOI POU PANE	5-7 KLISSOURAS ST.	ATHENS	161 21	+30210 725 7776/
		TRANSPORTATIONS	PANDOU				+30210 725 7780
		LOGISTICS					
		OPERATIONAL					
		SERVICES S.A.					
16.	04-063	ASTERIADIS GIORGOS	STAR COURIER	15 ARETEOU ST.	ATHENS	115 22	+30210 645 8600/
							+30210 645 7740
17.	01-227	AVGOUSTAKI IRINI	AVGOUSTAKI IRINI	134 ETHN.	IRAKLIO	713 06	+30281 028 4828,
				ANTISTASSEOS ST.	CRETE		+30281 028 4010/
							+30281 028 4010
18	03-029	BAMBATSIKOS	BAMBATSIKOS	3 BIZANIOU ST.	PIRGOS	271 00	+30262 102 9679/
		THEODOROS	THEODOROS	& SPETSON ST.			+30262 108 1343
19.	03-008	BANDAS A	INTEREVROS	54 KON.	ALEXANDROU-	681 00	+30255 108 9180/
		MAKRIDIS E. & CO		PALAIOLOGOU ST.	POLI		+30255 108 9181-2
20.	02-053	BENEKIS NIKOLAOS	MPS	25-27 GALVANI ST.	ATHENS	112 55	+30210 202 9776/
							+30210 202 9775
21.	04-089	BOUKOUVALA	BOUKOUVALA	9 ARCH.	EDESSA	582 00	+30238 102 1711/
		ANDRONIKI	ANDRONIKI	NIKODIMOU ST.			+30238 102 1711
22.	03-063	BOUZOS P DROUBO-	BOUZOS P DROUBO-	12 PAFOU ST.	RHODES	851 00	+30224 103 7838/
		GIANNIS E. & CO	GIANNIS E. & CO				+30224 103 8567
23.	01-279	BRATSIAKOU	BRATSIAKOU	18 VAS. OLGAS ST.	KALAMATA	241 00	+30272 109 6903/
		CHARALAMBIA	CHARALAMBIA				+30272 102 8606
24.	03-026	CAPOCCI COURIER LTD.	CAPOCCI COURIER LTD.	MEGARIDOS ST.	ASPROPIRGOS	193 00	+30210 550 0555/
				SINTRIVANI LOCALITY			+30210 550 0532
25.	04-081	CH. VARDAKAS -	GALAXY WORLDWIDE	3 ALKIONIAS ST.	ATHENS	116 31	+30210 752 0014,
		A. KAVADIAS LTD.					+30210 752 0016/
							+30210 752 0021
26.	00-175	CHALKIADAKIS	CHALKIADAKIS	13 ARKOLEONTOS ST.	IRAKLIO	712 02	+30281 034 1870/
		IOANNIS	IOANNIS		CRETE		+30281 034 4690
27.	03-004	CHARIZANIS PETROS	ORFEAS COURIER	73 ITHAKIS ST.	KIPSELI	115 51	+30210 821 7051/
							+30210 821 7032
28.	02-076	CHRISOS VOITHOS	CHRISOS VOITHOS LTD.	2 KEFALLINIAS ST.	THESSALONICA	546 27	+30231 050 2502/
		TACHIMETAFORES LTD.					+30231 050 2501
29.	01-281	CHRISOULI	CHRISOULI	7 KOUNDOURIOTOU	KAVALA	653 02	+30251 023 2051,
		ALEXANDRA	ALEXANDRA	ST.			+30251 062 0670/
							+30251 023 2051
30.	03-052	CHRISOULI EKATERINI	GOLD ARROW	43 MITROPOLEOS ST.	MAROUSSI	151 24	+30210 614 7111/
			SERVICES				+30210 614 7101
31.	04-043	CHRISOVALADI MARIA	SUPER EXPRESS	68 PETRIDI ST.	RHODES	851 00	+30224 107 8700/
							+30224 107 8709

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7170
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A.A.	REG.NO.	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
49.	02-071	DRAKOMATHIOULAKIS	DRAKOMATHIOU-	168 ETHN. ANTI-	IRAKLIO	713 06	+30281 033 3450/
		N. & CO	LAKIS N. & CO	STASEOS ST.	CRETE		+30281 033 0009
50.	99-069	DRAKOPOULOS	DRAKOPOULOS	20 AG. LOUKA SQ.	ZAKINTHOS	291 00	+30269 504 3636/
		ANDONIOS	COURIER				+30269 504 3636
51.	03-002	DROSOU VASILIKI	DROSOU VASILIKI	49 EL. POLIORKI-	MESOLOGGI	302 00	+30263 102 6545/
				MENON ST.			+30263 102 5800
52.	01-204	E. BEIKO & CO	SFERA EXPRESS -	20 ANDIGONIS ST.	CHALANDRI	152 32	+30210 683 3304/
			COURIER				+30210 683 3305
53.	04-046	EGNA DIETHNIS	EGNA COURIER	65B THESSALINIKIS ST.	N. FILADELFIA	143 42	+30210 250 5650/
		TACHIMETAFORES S.A.					+30210 250 5589
54.	01-200	ELTA COURIER S.A.	ELTA COURIER S.A.	40 D. GOUNARI ST.	AG. PARASKEVI	153 43	+30210 607 3000/
							+30210 607 3100
55.	00-167	EUROCOURIER S.A.	EUROCOURIER S.A.	201 ACHARNON ST.	ATHENS	104 46	+30210 869 5200/
							+30210 869 5205
56.	99-003	EXPRESS FLY LTD.	EXPRESS FLY	43 I. PASSALIDI ST.	THESSALONICA	544 53	+30231 094 3535,
							+30231 092 4886/
							+30231 094 3615
57.	03-057	FESTERIDIS	FESTERIDIS	2 MITROPOLITOU	DRAMA	661 00	+30252 105 7257/
		STEFANOS	STEFANOS	PROKOPIOU ST.			+30252 105 7258
58.	99-087	FLASH S.A	FLASH S.A.	225 MONASTIRIOU ST.	THESSALONICA	546 28	+30231 055 5061-2/
		KEFETH S.A.					+30231 055 5064
		TECHNOKATHARISTIKI					
59.	04-049	G. SIDERIS & CO	TROCHADIN	18 P. DELTA ST.	N. PSICHICO	115 25	+30210 672 5861/
							+30210 672 5865
60.	99-104	G. VOKOROKOS & CO	SPEED COURIERS	115-117 AKRO-	DAFNI	172 34	+30210 976 2007/
				POLEOS ST.			+30210 970 2672
61.	01-225	GANDIRI OLGA	COURIER GANDIRI	SCHIMATARI	SCHIMATARI	320 09	+30226 205 9277/
							+30226 205 9277
62.	04-001	GENIKES METAFORES	ENOSI	4 IRAS ST.	TAVROS	177 78	+30210 345 8152/
		ENOSIS MAKEDONIAS-	MAKEDONIAS LTD.				+30210 345 1194
	00.440	L. FINOS & CO		45 D4 G1/41 G	1457414005001	4// 50	00040 000 74004
63.	99-149	GENIKI TAXIDROMIKI	GENIKI TACHIDROMIKI		METAMORFOSI	144 52	+30210 280 7100/
c,	02.002	TACHIMETAFORON S.A.	CENIOS CIL	GIANNI ST.	DDAMA	CC1 00	+30210 283 5210
64.	02-063	GENOS CH	GENOS CH	21 K. PALAIOLO-	DRAMA	661 00	+30252 102 2008/
CE.	ດວ ດວວ	SAMARA E. LTD.	SAMARA E. LTD.	GOU ST.	CHVI KIDV	2/1 00	+30252 102 2008
65.	03-023	GEORGIOU ILIAS	PI&FI	4 STAMOULI ST. &	CHALKIDA	341 00	+30222 102 7603
86	03 040	CEDVI EAIC	CAMOS EVEDESS	KRIEZOTOU ST.	SAMOS	021 00	120227 202 E270/
66.	03-049	GERALEXIS GEORGIOS	SAMOS EXPRESS COURIER	5 NIKOLARIZI ST.	SUMAS	831 00	+30227 302 5379/ +30227 302 4388
67	03-005	GIANNAKAKIS	MY COURIER	8 PANORMOU ST.	EGALEO	122 42	+30210 531 1060/
57.	33-003	IOANNIS	COOKILIX	O I AROMINOU SI.	LUALLU	124 44	+30210 531 1000/
68.	01-298	GIANNAKOPOULOS	GIANNAKOPOULOS	3 DAMOFONTOS ST. &	KALAMATA	241 00	+30272 106 3390/
00.	31-230	GEORGIOS	GEORGIOS	50 PSARON ST.	IVALAMATA	∠ <del>-</del> 1 00	+30272 106 2387
69.	02-035	GIANNOPOULOU	GIANNOPOULOU	17 TSAKALOF ST.	KATERINI	601 00	+30235 107 7779/
55.	3 <u>2</u> 333	KALLIOPI-STELLA	KALLIOPI-STELLA	., 10/11/12/1 51.	IVALEIMINI	001 00	+30235 107 7779
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A.A.	REG.NO.	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
70.	03-053	GIOTI VASSILIKI	GIOTI VASSILIKI	123 KARAISKAKI ST.	PATRA	262 21	+30261 024 3077/
							+30261 024 3078
71.	99-043	GOLAS NIKOLAOS	IDS COURIER	5 ANDISTHENOUS ST.	N. KOSMOS	117 43	+30210 921 7060.
							+30210 921 7362/
							+30210 921 7514
72.	01-206	GOLD MAIL	GOLD MAIL S.A.	26 THERMOPILON ST.	AG. DIMITRIOS	173 43	+30210 975 5555/
	. 200	COURIER S.A.			7.0. 2	.,,	+30210 976 6623
73.	01-195	GOLDEN COURIER	GOLDEN COURIER	8 EGALEO ST.	PIRAEUS	185 45	+30210 406 1130/
		HELLAS S.A.	HELLAS S.A.				+30210 406 1139
74.	02-033	GOUDIS NAOUM	GOUDIS NAOUM	3 AG. MINA ST.	KASTORIA	521 00	+30246 702 7138,
							+30246 702 3525/
							+30246 702 7138
75.	03-056	GOURAS PANDELIS	BUSINESS COURIER	107 IPOSMINAGOU	KALLITHEA	176 71	+30210 953 0434/
			200200 0002	PAROUSI ST.		.,,,,,	+30210 953 0723
76.	04-030	HELLENIC	FORWARD	2 IROON SQ.	ELEFSINA	192 00	+30210 556 1111,
7.5.	0.000	COURIERS LTD.	COURIERS LTD.			.52.55	+30210 556 2280/
		3031112110 2121					+30210 554 1600
77.	03-070	HELLENIC	HELLENIC	8 -12 AG. THOMA ST.	ATHENS	115 27	+30210 777 7291/
		TACHIDIADROMES	TACHIDIADROMES		7		+30210 777 7528
		COURIERS S.A.	COURIERS S.A.				
78.	04-091	I. EVGENIS-	INTERLINE	53 PAPADA ST.	ATHENS	115 26	+30210 699 7095, 59/
		CH. TZOKAS COURIER	COURIER LTD.				+30210 699 7059
		ENTERPRISE LTD.					
79.	02-052	I. FIRIGOS LTD.	ARMAOS COURIER	12 IKONOMOU ST.	ATHENS	106 83	+30210 330 0507/
							+30210 381 0249
80.	03-033	I. GIANNAKIDIS-	I. GIANNAKIDIS-TH.	25 CHAR.TRIKOUPI ST.	KOMOTINI	691 00	+30253 108 3100,
		TH. VOSVOLIDIS LTD.	VOSVOLIDIS LTD.				+30253 108 3101
81.	04-082	IAKOVIDIS CHRISTOS	PIERIA COURIER	8 TSAKALOF ST.	KATERINI	601 00	+30235 107 7779/
							+30235 107 7779
82.	99-145	IDP EXPRESS	IDP EXPRESS S.A.	3 BIZANIOU ST.	THESSALONICA	555 35	+30231 033 1080/
		INTERNATIONAL					+30231 033 1290
		DOCUMENTS					
		& PARCELS					
		TRANSPORTATION S.A.					
83.	04-044	ILIADHI STENERAJD	ILIADHI STENERAJD	13 PILARINOU ST.	KORINTHOS	201 00	+30274 107 5870
84.	99-136	INTERATTICA COURIER	INTERATTICA	415 PANAGI	KALLITHEA	176 75	+30210 946 6400/
		NETWORK S.A.		TSALDARI ST.			+30210 940 7680
85.	99-152	INTERNATIONAL	INTERNATIONAL	22 AG. DIONISSIOU ST.	PIRAEUS	185 40	+30210 413 4605/
		TRAFFIC COURIER LTD.	TRAFFIC				+30210 413 3395
			COURIER LTD.				
86.	99-108	INTERPOST	INTERPOST S.A.	4 TH. IKONOMOU ST.	ATHENS	115 25	+30210 674 3300/
		INTERNATIONAL					+30210 674 3344
		TRANSPORTATION					
		OF DOCUMENTS					
		& PARCELS S.A.					

88. 00-  89. 04-  90. 04-  91. 03-  92. 04-  93. 00-  94. 02-	4-108 0-179 4-047 4-065 3-036 4-078 0-176 2-032	IOANNIDIS CHARILAOS  IOANNOU LEONIDAS  CO  IVANOVA SIMONA  K. BOZINIS -  A. DIGA & CO  K. DORLI LTD.  K. KALIAKATSOS -  D. VOLTIS LTD.  K. MITRITZAKIS & CO  K. TILLIRIDIS-	CYPRUS COURIERS & SERVICES COURIERS AT TOP SPEED (CTS)  IVANOVA SIMONA UNISON C.S.  ERMIS DUCK MAIL YOUR PERSONAL COURIER TRANSPORTS EXPRESS LINE	17 ZAN MOREAS ST. 29 THOUKIDIDOU ST. 13 DOUKA ST. 38 D. STEFANOU ST. 19 GOUMERAS ST. 58 PAPADA ST.	ATHENS  AG. ANARGIRI  CHALKIDA  THESSALONICA  PTOLEMAIDA  ATHENS	117 41 135 62 341 00 542 50 502 00 115 25	+30210 924 4070 +30210 238 8618. +30210 232 1333/ +30210 238 7778 +30231 032 2022/ +30231 032 2080 +30246 302 3801 +30210 692 3111, 18, 19/
89. 04- 90. 04- 91. 03- 92. 04- 93. 00- 94. 02-	4-047 4-065 3-036 4-078	& CO  IVANOVA SIMONA  K. BOZINIS - A. DIGA & CO K. DORLI LTD.  K. KALIAKATSOS - D. VOLTIS LTD.  K. MITRITZAKIS & CO	COURIERS AT TOP SPEED (CTS)  IVANOVA SIMONA UNISON C.S.  ERMIS DUCK MAIL YOUR PERSONAL COURIER TRANSPORTS	13 DOUKA ST. 38 D. STEFANOU ST. 19 GOUMERAS ST. 58 PAPADA ST.	CHALKIDA THESSALONICA PTOLEMAIDA	341 00 542 50 502 00	+30210 232 1333/ +30210 238 7778 +30231 032 2022/ +30231 032 2080 +30246 302 3801 +30210 692 3111, 18, 19/
89. 04- 90. 04- 91. 03- 92. 04- 93. 00- 94. 02-	4-047 4-065 3-036 4-078	& CO  IVANOVA SIMONA  K. BOZINIS - A. DIGA & CO K. DORLI LTD.  K. KALIAKATSOS - D. VOLTIS LTD.  K. MITRITZAKIS & CO	IVANOVA SIMONA UNISON C.S.  ERMIS DUCK MAIL YOUR PERSONAL COURIER TRANSPORTS	13 DOUKA ST. 38 D. STEFANOU ST. 19 GOUMERAS ST. 58 PAPADA ST.	CHALKIDA THESSALONICA PTOLEMAIDA	341 00 542 50 502 00	+30210 232 1333/ +30210 238 7778 +30231 032 2022/ +30231 032 2080 +30246 302 3801 +30210 692 3111, 18, 19/
90. 04- 91. 03- 92. 04- 93. 00- 94. 02-	4-065 3-036 4-078 0-176	IVANOVA SIMONA K. BOZINIS - A. DIGA & CO K. DORLI LTD. K. KALIAKATSOS - D. VOLTIS LTD. K. MITRITZAKIS & CO	IVANOVA SIMONA UNISON C.S.  ERMIS DUCK MAIL YOUR PERSONAL COURIER TRANSPORTS	38 D. STEFANOU ST.  19 GOUMERAS ST.  58 PAPADA ST.	THESSALONICA PTOLEMAIDA	542 50 502 00	+30210 238 7778 +30231 032 2022/ +30231 032 2080 +30246 302 3801 +30210 692 3111, 18, 19/
90. 04- 91. 03- 92. 04- 93. 00- 94. 02-	4-065 3-036 4-078 0-176	K. BOZINIS - A. DIGA & CO K. DORLI LTD. K. KALIAKATSOS - D. VOLTIS LTD. K. MITRITZAKIS & CO	UNISON C.S.  ERMIS  DUCK MAIL YOUR  PERSONAL COURIER  TRANSPORTS	38 D. STEFANOU ST.  19 GOUMERAS ST.  58 PAPADA ST.	THESSALONICA PTOLEMAIDA	542 50 502 00	+30231 032 2022/ +30231 032 2080 +30246 302 3801 +30210 692 3111, 18, 19/
90. 04- 91. 03- 92. 04- 93. 00- 94. 02-	4-065 3-036 4-078 0-176	K. BOZINIS - A. DIGA & CO K. DORLI LTD. K. KALIAKATSOS - D. VOLTIS LTD. K. MITRITZAKIS & CO	UNISON C.S.  ERMIS  DUCK MAIL YOUR  PERSONAL COURIER  TRANSPORTS	38 D. STEFANOU ST.  19 GOUMERAS ST.  58 PAPADA ST.	THESSALONICA PTOLEMAIDA	542 50 502 00	+30231 032 2080 +30246 302 3801 +30210 692 3111, 18, 19/
91. 03-1 92. 04-1 93. 00- 94. 02-1	3-036 4-078 0-176	A. DIGA & CO K. DORLI LTD. K. KALIAKATSOS - D. VOLTIS LTD. K. MITRITZAKIS & CO	ERMIS DUCK MAIL YOUR PERSONAL COURIER TRANSPORTS	19 GOUMERAS ST. 58 PAPADA ST.	PTOLEMAIDA	502 00	+30231 032 2080 +30246 302 3801 +30210 692 3111, 18, 19/
92. 04- 93. 00- 94. 02-	4-078 0-176	K. DORLI LTD. K. KALIAKATSOS - D. VOLTIS LTD. K. MITRITZAKIS & CO	DUCK MAIL YOUR PERSONAL COURIER TRANSPORTS	58 PAPADA ST.			+30246 302 3801 +30210 692 3111, 18, 19/
92. 04- 93. 00- 94. 02-	4-078 0-176	K. KALIAKATSOS - D. VOLTIS LTD. K. MITRITZAKIS & CO	DUCK MAIL YOUR PERSONAL COURIER TRANSPORTS	58 PAPADA ST.			+30210 692 3111, 18, 19/
93. 00- 94. 02-	)-176	D. VOLTIS LTD. K. MITRITZAKIS & CO	PERSONAL COURIER TRANSPORTS		ATHENS	115 25	, ,
94. 02-		K. MITRITZAKIS & CO	TRANSPORTS	20 DOCIDONOC CT			
94. 02-				20 DOCIDONOS ST			+30210 698 2579
	2-032	K. TILLIRIDIS-	EXPRESS I INF	28 POSIDONOS ST.	THESSALONIKA	542 50	+30231 048 6760/
	2-032	K. TILLIRIDIS-	LAI INLUU LINE				+30231 048 6762
95. 99-			G.S.C.	101 ALKAME-	ATHENS	104 45	+30210 881 3080/
95. 99-		A. MOURATAI LTD.		NOUS ST.			+30210 881 8860
	9-046	KAMBOURIS	IKAROS COURIER	53 ORFANIDOU ST.	ATHENS	111 42	+30210 213 3130,
		EMMANOUIL					+30210 213 3230/
							+30210 213 3130
96. 03-	3-065	KADITIS	KADITIS	31 SATO-	ATHENS	104 31	+30210 524 0762/
		KONSTANTINOS	KONSTANDINOS	VRIANDROU ST.	711112113		+30210 523 9827
97. 02-	2-045	KALAFATIS	KALAFATIS	98 STAMATIOU	ERMOUPOLIS -	841 00	+30228 108 3183/
37. 02	- 040	EVANGELOS	EVANGELOS	PROIOU ST.	SIROS	041 00	+30228 108 8448
98. 04-0	4-024	KALFA DESPOINA	D.C.A. COURIER	93 AG. VARVARAS ST.	P. FALIRO	175 63	+30210 982 5527/
30. 04-0	1-024	KALFA DESFUINA	D.C.A. COOKIEK	33 AG. VARVARAS 31.	F. FALIKO	1/3 03	+30210 982 5597
99. 99-	9-018	KANARIOU EVRIDIKI	CHIOS EXPRESS	46 KOUNDOU-	CHIOS	821 00	+30227 104 4707/
33. 33-	9-010		CHIUS EXPRESS		СПІОЗ	021 00	
100 0/	, 000	COURIER	CDANIDE EVODECC	RIOTOU ST.	DIDAFIIC	105.00	+30227 102 1369
100. 04-	1-083	KANATSELIS	GRANDE EXPRESS	145 KOLOKOTRONI	PIRAEUS	185 36	+30210 453 3633/
101 00		DIMITRIOS	COURIER	ST.	ATUENC	110 /5	+30210 418 6886
101. 03-	3-044	KANELATOS	SPRIDER COURIER	77B KALLIROIS ST.	ATHENS	117 45	+30210 223 5500/
100 00	100	GEORGIOS LTD.	1/4NO4 SEDVICES	0/ TUESSAL SAUVIS ST	N 50 AB51 51A	1/0/0	+30210 223 5504
102. 99-	9-102	KANGA SERVICES	KANGA SERVICES	34 THESSALONIKIS ST.	N. FILADELFIA	143 42	+30210 252 5175/
		COURIERS S.A.					+30210 251 1115
103. 04-	¥-027	KANKO COURIER S.A.	KANKO COURIER S.A.	9 SCHOINON ST.	ACHARNES	136 72	+30210 240 9118-20/
							+30210 240 9121
104. 02-	2-005	KANTZA CHARIKLIA	COURIER KANTZAS	28A VIRONOS ST.	LAMIA	351 00	+30223 103 9564,
							+30223 104 2474/
							+30223 102 9285
105. 04-	4-026	KAPORALIS N	LOCAL EXPRESS	4 CHRISOSTOMOU	N. SMIRNI	171 21	+30210 931 0278,
		MORAITIS G. & CO	COURIER	SMIRNIS SQ.			+30210 931 0280/
							+30210 931 0275
106. 01-	I-201	KARADIMOS	CS-CARAD COURIER	23 SOKRATOUS ST.	LARISSA	413 36	+30241 028 6605/
		DIMITRIOS					+30241 055 5209
107. 03-	3-007	KARAGIOZIDOU	CITY RUNNERS	32 PRIAMOU ST.	P. FALIRO	175 64	+30210 940 5385/
		ATHINA & CO					+30210 940 5385
108. 03-	3-050	KARAKOSTA GEORGIA	KARAKOSTA	20 ETHN.	AMFISSA	331 00	+30226 507 9262/
			GEORGIA	ANTISTASEOS ST.			+30226 507 9269

A.A.	REG.NO.	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
109.	99-001	KARAMANOS PAVLOS	EXPRESS	71 SP. TRIKOUPI ST.	ATHENS	106 83	+30210 821 9959/
			CITY SERVICES		7		+30210 821 9217
110.	03-048	KARANDZAS	TACHIMETAFORES	FILONOS ST. &	LIVADIA	321 00	+30226 102 3213/
	00 0 10	NIKOLAOS	KARANDZAS	ARISTOFANOUS ST.		52. 55	+30226 108 2002
111.	99-071	KARATSIOLIS	KARATSIOLIS	2 ROMANOU ST.	SERRES	621 24	+30232 102 4222/
	33 071	EVANGELOS	EVANGELOS	Z NOMANOO ST.	SERRES	02124	+30232 105 3436
112.	01-208	KAREKLAS SOTIRIOS	KAREKLAS SOTIRIOS	11 KENDRIKIS ST.	VERIA	591 00	+30233 107 3680,
112.	01 200	TOTAL CAS SO TITLOS	TOTAL CLASS SOTTINGS	TT NEIGHT ST.	VERMA	001 00	+30233 106 0490/
							+30233 107 3680
113.	04-114	KAZANI PARASKEVI	KAZANI PARASKEVI	28 VIRONOS ST.	LAMIA	351 00	+30223 104 2474/
113.	04-114	TOZANT ANASINEVI	TOZANT ANOSKEVI	20 VII(01403 31.	LAMA	331 00	+30223 104 24747
114.	02-020	KIOULAFIS	KIOULAFIS	CHORA NAXOU	NAXOS	843 00	+30228 502 3965/
114.	02-020	THEODOSIOS	THEODOSIOS	CHOICA NAXOO	IVAXOS	043 00	+30228 502 3968
115.	01-221	KIRIAKODIS I	INTER CHIOS	7 SKANAVI ST.	CHIOS	821 00	+30227 108 1278/
113.	01-221	KONDOS E. LTD.	COURIER	7 SKANAVI SI.	CHIOS	021 00	+30227 108 1278
116.	04-045	KIRILLIDIS	IDS COURIER	57 VITSI ST.	THESSALONICA	546 27	+30231 052 9000/
110.	04-045	KONSTANDINOS	IDS COOKIEK	37 VIISI 31.	THESSALUNICA	340 27	+30231 052 9000/
117	00-180		KIDKUC DYCCHYI IC	2 KOMNINON ST.	CEDDEC	621.22	
117.	00-100	KIRKOS PASCHALIS	KIRKOS PASCHALIS	2 KUMININUN 31.	SERRES	621 23	+30232 105 1115,
							+30232 109 8378/
110	99-019	IZI AVDIANOC IZECAD	IZI AVIDIANIOS IZESAD	E IZAL VOLL CT	ZAKINITUOS	201.00	+30232 109 8378
118.	99-019	KLAVDIANOS KESAR	KLAVDIANOS KESAR	5 KALVOU ST.	ZAKINTHOS	291 00	+30269 504 9222/
110	07 021	IZI EITOU CEODCOUL A	DUCU FUTE COUDIED	20 ADICTEIDOU CT	IZAL LITLIFA	176 71	+30269 504 9222
119.	04-021	KLEITOU GEORGOULA	RUSH ELITE COURIER	28 ARISTEIDUU ST.	KALLITHEA	176 71	+30210 957 7784/
120	0/ 00/	KONCTANDINIDIC	INTERCITY EVERECE	1/ DIOCENOUS ST	I/ TOUMDA	E// E2	+30210 957 7785
120.	04-094	KONSTANDINIDIS	INTERCITY EXPRESS	14 DIOGENOUS ST.	K. TOUMBA -	544 53	+30231 090 0422-3/
121.	99-052	DIMITRIOS KONSTANDI-	KONSTANDI-	350A KORINTHOU ST.	THESSALONICA PATRA	262 22	+30231 090 0423 +30261 031 2151/
121.	99-002	NOPOULOU MARIA	NOPOULOU MARIA	330A KUKINTHUU ST.	PAIRA	202 22	+30261 031 21517
122.	04-113	KONSTANDINOS	INTERNATIONAL	23 S. VEMBO ST.	GLIFADA	166 75	+30210 960 3035-6/
122.	04-113	AREALIS & CO	PARCEL EXPRESS	23 3. VEMIDO 31.	GLIFADA	100 /3	+30210 960 3335-0/
123.	04-029	KONSTANDINOS ST.	TRANSFILM	3 PA. ASMANI ST.	NIKAIA	184 52	+30210 494 1087/
123.	04-025	BAGDATOGLOU	INANSFILM	3 FA. ASMAINI ST.	NIVAIA	104 32	+30210 494 1087
12/	04-058	KOSTAKOU ELENI	DAILY SERVICES	KLIDI IMATHIAS	KLIDI	590 32	+30233 307 1910.
124.	04-036	ROSTAROO ELENI	DAILT SERVICES	KLIDI IMATHIAS	KLIDI	350 32	+30233 307 1910,
							+30233 307 1910,
105	00 022	VOCTAMIC CUDICTOR	LOCTAMIC CUDICTOR	26 MADODICTRIOUSET	I/ADDITCA	/21.00	+30231 054 4744
125.	99-022	KOSTAMIS CHRISTOS	KUSTAMIS CHRISTUS	36 KAPODISTRIOU ST.	KARDIISA	431 00	+30244 107 1941,
							+30244 102 6676/
126	0/ 0F1	MOCTIC MACILIDO	MUCTIC MACILIOC	1 VIDONOS AVE	MESOLOGGI	202.00	+30244 102 6676
120.	04-051	KOSTIS VASILIOS	KOSTIS VASILIOS	1 VIRONOS AVE.	MESOLOGGI	302 00	+30263 102 2143/
107	02.000	KONEODONAON	KONEODON ON	E CED DATBON CT	TDIDOLI	221.00	+30263 102 2143, 27140
127.	02-008	KOUFOPOULOU	KOUFOPOULOU	5 GER. PATRON ST.	TRIPOLI	221 00	+30271 022 1991/
100	00 150	PANAGIOTA	PANAGIOTA	c polpou cT	CHIOC	001.00	+30271 022 1992
128.	00-172	KOUNELIS NIKOLAOS	KOUNELIS NIKOLAOS	ס אטוטטט 1.	CHIOS	821 00	+30227 102 3769/
							+30227 104 3605

A.A.	REG.NO.	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
129.	03-012	KOUTSOULA GEORGIA	KOUTSOULA GEORGIA	59 E. VENIZELOU ST.	SOUFLI	684 00	+30255 402 9631/ +30255 402 9631
130.	99-042	LADAS DIMITRIOS	TACHIMETAFORES LADA	23 CHR. SMIRNIS ST.	N. MOUDANIA	632 00	+30237 302 2865, +30237 302 4052/ +30237 302 4644
131.	04-106	LASPAS P. & CO	TACHIDROMEAS	71 THEAGENOUS CHARISI ST.	THESSALONICA	546 39	+30231 091 4088, +30231 094 4116/ +30231 093 0048
132.	03-055	LAZARIDOU INDA	CONNECT COURIER SERVICES	103 IVIS ST.	P. FALIRO	175 61	+30210 981 2069/ +30210 981 2069
133.	01-196	LEVAKIS KOSTAS	LEVAKIS KOSTAS	12 MICHAIL VOGDOU ST.	XANTHI	671 00	+30254 106 4500/ +30254 106 4544
134.	01-212	LIPAKI M. & CO	DAIDALOS COURIER	15 DIMOKRATIAS ST.	IRAKLIO	713 06	+30281 022 9869, +30281 022 2988/ +30281 022 9881
135.	03-024	LOUKOVITIS ASTERIOS	LOUKOVITIS ASTERIOS	12 KASSANDRAS ST.	N. MOUDANIA	632 00	+30237 306 5750/ +30237 306 5751
136.	01-243	M. KATSIMENIS- N. KEMBERAS LTD.	HELLENIC AIR COURIER	22 FRAGON ST.	THESSALONICA	546 25	+30231 055 6076/ +30231 055 6077
137.	04-085	MAGIROPOULOS APOSTOLOS	EURO MAIL	8 DODEKANISSOU ST.	THESSALONICA	546 26	+30231 025 3098, +30231 054 0105
138.	99-012	MAKKAS KONSTANDINOS	INTERLINE COURIER	56 M. BRANDOUNA ST.	ATHENS	115 25	+30210 672 8364-5
139.	02-049	MAKRIPOULIAS KONSTANDINOS	AGRINIO COURIER	OCTOBER 28 <sup>th</sup> SQ.	AGRINIO .	301 00	+30264 105 7419/ +30264 105 5883
140.	04-069	MALLIARAKI - MALIAROU ANNA	JET LINES COURIER	109 ALKIVIADOU ST.	ATHENS	104 46	+30210 881 5776, 9/ +30210 884 2131
141.	00-170	MANIATIS KLEANTHIS	MANIATIS KLEANTHIS	29 KAVETSOU ST.	MITILINI	811 00	+30225 103 7437/ +30225 104 3903
142.	03-014	MARANGOS POLIVIOS	POLIS	10 IVIS ST.	PERISTERI	121 37	+30210 571 8775/ +30210 576 3101
143.	04-050	MARIS FOTIOS	MARIS FOTIOS	57 EL. VENIZELOU ST.	VONITSA	300 02	+30264 302 3655/ +30264 302 3655
144.	02-037	MARKOS BIZAS COMMERCIAL TOURIST ENTERPRISES- CAR RENTALS S.A.	EUROCYCLADES S.A.	EKATONDA - PILIANIS SQ. PARIKIA PAROU	PAROS	844 00	+30228 402 5171/ +30228 402 2146
145.	99-089	MARNELAKIS P. & CO	ILIOS COURIER	1 VLASTON ST.	IRAKLIO	712 02	+30281 028 2549, +30281 028 4454/ +30281 028 2549
146.	99-017	MARTSAKIS PANAGIOTIS	MARTSAKIS PANAGIOTIS	86 AN. GOGONI ST.	CHANIA	731 00	+30282 107 4551/ +30282 107 4551
147.	01-301	MASS COURIER- TACHIMETAFORES S.A.	MASS COURIER	119 STR. PAPAGOU ST.	AG. DIMITRIOS	173 41	+30210 970 3409/ +30210 976 5375
148.	02-054	MAVILI ELENI	TACHIDROMEAS	49 FILIKIS ETERIAS ST.	THESSALONICA	546 21	+30231 022 3120/ +30231 022 3120

A.A.	REG.NO.	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
149.	04-019	MAXIMIADIS	HELLENIC	100 AG. DIMITRIOU ST.	THESSALONICA	546 33	+30231 028 7942/
		PAVLOS & CO	TACHIDIANOMES				+30231 024 1851
150.	99-127	MEDITERRANEAN	COURIER CENTER	265 IMITTOU ST.	ATHENS	116 31	+30210 751 7300/
		COURIER LTD.					+30210 751 7022
151.	99-031	MELENIKIOS	MELENIKIOS	5 THESSALONIKIS ST.	SERRES	621 23	+30232 105 6956/
		ANDONIOS	ANDONIOS				+30232 105 6956
152.	99-007	MESIMERTZIS	MESIMERTZIS	16 SOKRATOUS ST.	TRIKALA	421 00	+30243 103 3425,
		KONSTANDINOS	KONSTANDINOS	& PLOUTONOS ST.			+30243 107 6263/
							+30243 103 9358
153.	02-061	METOCHIANAKIS ILIAS	APOLLO COURIER	4 TENEDOU ST.	IRAKLIO CRETE	713 06	+30281 022 1480
154.	99-125	METROPOLITAN	METROPOLITAN	1-3 AFRODITIS ST.	KALLITHEA	176 72	+30210 959 4461/
		COURIERS LTD.	COURIERS LTD.				+30210 952 5050
155.	04-070	MICHAILIDOU ANNA	MICHAILIDOU ANNA	44 MENANDROU ST.	ATHENS	104 31	+30210 522 3832
156.	04-037	MISKA ASPASIA	MISKA ASPASIA	65 MEG.	FLORINA	531 00	+30238 504 4800/
				ALEXANDROU ST.			+30238 504 4801
157.	04-104	MITSOURA	MITSOURA	5 G. MESSINI ST.	LEFKADA	311 00	+30264 502 3402/
		KRISTALLIA	KRISTALLIA				+30264 502 3402
158.	02-043	MORAITIS ANDREAS	MORAITIS ANDREAS	84 CHAR. TRIKOUPI ST.	AGRINIO	301 00	+30264 105 8887/
							+30264 105 8887
159.	99-107	MOREAS	MOREAS	52 OTHONOS ST	PATRA	262 21	+30261 062 1212/
		KANELLOPOULOS - KANISTRAS TRANSPORTATIONS & AGENCIES LTD.		AMALIAS ST.			30261 022 5211
160	99-002	MOSCHOPOULOS	FIS COURIER	9 K. PALAMA ST.	N. IRAKLIO	141 22	+30210 283 5985.
100.	00 002	IOANNIS	SERVICES	ora rate and ora	11. 110 111210	1-1	+30210 283 4111/
		10, 11 11 10	<u> </u>				+30210 283 4555
161.	99-126	MOULDIS NIKOLAOS	AIOLOS COURIER	1 KERAMEON ST. &	ATHENS	104 36	+30210 522 0039/
		& CO	SERVICE	2 LENORMAN ST.			+30210 522 0229
162.	01-269	MOUTSOU PANAGIOTA	LESVOS EXPRESS	50 AEROPOROU	MITILINI	811 00	+30225 104 6008,
				GENNARELI ST.			+30225 104 5794/
							+30225 104 6008
163.	03-040	N. ATSALIS-	DAY 1	17 N. MALTEZOU ST.	ALIMOS	174 55	+30210 988 8300/
		A. GOGOS LTD.					+30210 988 2382
164.	02-016	NATSI ZOI	FN COURIER	3 MITROPOLEOS ST.	KASTORIA	521 00	+30246 702 3705/
							+30246 702 3705
165.	03-009	NDOKOS GEORGIOS	NDOKOS GEORGIOS	15 SOULIOU ST.	IGOUMENITSA	461 00	+30266 502 6450, 6448/
							+30266 502 5502
166.	99-063	NDOULIAS	TACHIERGOS	20 ATH. DIAKOU ST.	ZOGRAFOU	157 72	+30210 775 1952/
		ZACHARIAS	COURIER				+30210 775 1952
167.	01-249	NIKOLOPOULOU	NIKOLOPOULOU	7 ARCHIMIDOUS ST.	PIRGOS	271 00	+30262 103 1240/
		KOUTSOPOULOU	KOUTSOPOULOU				+30262 103 1240
		CHARALAMBIA	CHARALAMBIA				
168.	01-203	OFFICE EXPRESS	OFFICE EXPRESS	91 FILIPPOU ST.	THESSALONICA	546 35	+30231 024 5071/
		COURIER ONE - PERSON LTD.					+30231 024 5975

A.A	REG.NO.	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
	04-056	OFFICES SERVICE	OFFICES SERVICE	10 KALLIRROIS ST.	ATHENS	117 43	+30210 924 7017/
		ADVERTISING SERVICES - COMMERCIAL S.A.					+30210 924 7608
170.	03-067	OMEGA EVROPEOI SIMVOULOI, TOURISTIKES EPICHIRISIS LTD.	INTIGO TOURISM LTD.	KAMARI	SANTORINI	151 26	+30228 602 8890/ +30228 602 8891
171.	03-058	ORBIT COURIER S.A.	ORBIT COURIER S.A.	141 31st km VARIS - KOROPIOU RD	KOROPI	194 00	+30210 662 0222/ +30210 662 0999
172.	99-033	ORFANIDIS APOSTOLOS	GENESIS COURIER	26 KORITSAS ST.	ATHENS	173 42	+30210 996 6661/ +30210 992 4767
173.	99-010	ORFANOS DIMITRIOS	EURO POST COURIER SERVICE	5 AG. PARASKEVIS ST.	THESSALONICA	561 23	+30231 072 4207/ +30231 072 4207
174.	03-015	OSLANITIS CHRISTOS	OSLANITIS CHRISTOS	2 <sup>nd</sup> PARODOS - 6 KORAI ST.	NAOUSA	592 00	+30233 202 9290/ +30233 202 9290
175.	03-042	P. CHATZIKALIMNIOS - V. KATSOULA LTD.	P. CHATZIKALIMNIOS - V. KATSOULA LTD.	114 PINDAROU ST.	THIVA	322 00	+30226 208 9439/ +30226 208 9439
176.	01-210	P. MANEADIS - A. PLESSAS LTD.	ATHENS COURIER	12 TROON ST. & 30 ITHAKIS ST.	PERISTERI	121 33	+30210 572 5538/ +30210 572 5538
177.	01-194	PAFIS KIRIAKOS	PAFIS KIRIAKOS	10 IOANNINON ST.	KOMOTINI	691 00	+30253 103 7424/ +30253 108 1502
178.	99-154	P.A.KO COURIER LTD.	P.A.KO COURIER LTD.	3 ATHAN. DIAKOU ST.	NEAPOLI THESSALONIKIS	567 27	+30231 051 5421/ +30231 051 5443
179.	04-080	PALAMIOTIS SOTIRIS	PALAMIOTIS SOTIRIS	MANDILARA ST. & 1 LIVANATON ST.	LARISSA	412 22	+30241 057 9770/ +30241 057 9771
180.	02-073	PANAGIOTIDOU STAVROULA	PANAGIOTIDOU STAVROULA	3 AMERICANIKOU ERITHROU STAVROU ST.	KAVALA	652 01	+30251 023 2235/ +30251 023 2235
181.	99-027	PANOU ANDREAS	PANOU AIR SERVICE	2 ERMOU ST.	THESSALONICA	546 25	+30231 053 5548/ +30231 054 6238
182.	99-072	PANDELOPOULOU ANASTASIA	PCI (POST COURIER INTERNATIONAL)	4 GIANNIDI ST.	MOSCHATO	183 46	+30210 483 9583/ +30210 483 9581
183.	04-061	PAPADATOS CHRISTOS	PAPADATOS CHRISTOS	2 KRITIS ST.	ARGOSTOLI	281 00	+30267 102 6444/ +30267 102 6844
184.	99-080	PAPADATOS PANAGIOTIS	PCS	3 PATREOS ST.	PATRA	262 21	+30261 022 2992, +30261 022 1857/ +30261 062 0074
185.	04-062	PAPAGEORGIOU AMALIA	LEON AMA	9 LIKOURGOU ST.	ATHENS	176 73	+30210 522 8107/ +30210 522 6224
186.	04-095	PAPANIKOLAOU PANAGIOTA	PAPANIKOLAOU PANAGIOTA	ARCH. MAKARIOU ST. & 1 METSOVOU ST.	IOANNINA	452 21	+30265 104 4200/ +30265 104 4552
187.	99-085	PAPPA EVANGELIA	PANIPIROTIKI EXPRESS	21 IRINIS AVE.	PREVEZA	481 00	+30268 202 9521, +30268 202 1277/ +30268 202 1232
188.	00-173	PARAPAREKIS SAVVAS	DIAKINISI EXPRESS COURIER	5 MILTIADOU ST.	CHALANDRI	152 32	+30210 682 6408/ +30210 682 6778

A.A.	REG.NO.	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
189.	02-056	PARASKAKIS	PARASKAKIS	41 GRIGORIOU E'. ST.	CHANIA	731 35	+30282 103 6001/
		MICHAIL	MICHAIL				+30282 108 7771
190.	04-033	PENSOS EVANGELOS	CORRERE	OKTOVRIOU 26th ST.	THESSALONICA	546 27	+30231 055 6160
			THESSALONIKI				
			GROUP				
191.	04-055	PERISTERAKIS S.	PRISMA SERVICE	28 PINDAROU ST.	P. FALHRO	175 63	+30210 985 0474/
		& CO					+30210 983 5101
192	03-019	PETROULI ELISSAVET	PETROULI ELISSAVET	2 ΚΔΕΚΔΩΝΙΙ ΩΤ	KILKIS	611 00	+30234 107 0226/
	00 010	7 211(002) 22(00)(12)	1 211(002) 22100/(121	210410100001.	THEIRIG	011.00	+30234 107 0336
193.	03-011	POURIDOU IRINI	WEST MACEDONIAN	5 KON. KARAMANLI ST.	EI ODINA	531 00	+30234 107 0550
133.	03-011	FOORIDOO IRIINI	COURIER	J KON. KAKAMANLI JI.	FLORINA	331 00	
			COURIER				+30238 504 4453/
10/	00 001	DDISMA CEDVICE LTD	DDISMA CEDVICE LTD	OO DIND A DOLL ST	D EALIDO	185.00	+30238 504 5040
194.	99-091	PRISMA SERVICE LTD.	PRISMA SERVICE LTD.	28 PINDARUU ST.	P. FALIRO	175 63	+30210 985 0474,
							+30210 985 2660/
							+30210 983 5101
195.	99-148	PROMOTION	PDS LTD.	8 ARCHIMIDOUS ST.	ATHENS	116 35	+30210 920 0101/
		DISTRIBUTION					+30210 920 0103
		SERVICES LTD.					
196.	99-049	PSARAKIS NIKOLAOS	PSARAKIS NIKOLAOS	8 TZANAKAKI ST.	CHANIA	731 00	+30282 105 6532,
							+30282 104 2860/
							+30282 105 2954
197.	04-077	QUICK	QFS	A.I.A.	SPATA	190 19	+30210 354 2244-5/
		INTERNATIONAL		EL. VENIZELOS			+30210 354 2347
		FREIGHT		GRAFIO 523			
		SERVICES LTD.					
198.	99-147	RACHOULI EVGENIA	RACHOULI EVGENIA	13 PLATONOS ST.	VOLOS	383 33	+30242 103 8612/
							+30242 102 4442
199.	00-156	RAGGOU MERITZANI	RAGGOS COURIER	6 SEPTEMVRIOU 14th ST.	GIANNITSA	581 00	+30238 202 5859/
							+30238 202 7672
200.	99-009	RALLIS ANDONIOS	RALLIS ANDONIOS	30 DIKASTIRION ST.	ALEXANDROU-	681 00	+30255 103 3250/
					POLI		+30255 103 5566
201.	99-081	RAPTIS ATHANASIOS	RAPTIS ATHANASIOS	294 KORINTHOU ST.	PATRA	262 22	+30261 033 7733/
		- · · · <u>-</u>					+30261 031 7830
202	99-038	RENDAS	RENDAS	1 FILELLINON ST.	ARGOS	212 00	+30275 106 3390,
		KONSTANDINOS	KONSTANDINOS			55	+30275 102 2405/
		TOTION AND IN CO.	1101101711100				+30275 106 3390
203	99-035	RIGANAS	RIGANAS COURIER	60 PALEOKASTRITSA	CORFU	491 00	+30266 104 7463/
۷٠٠.	33-033		MONIAS COOKIEK		30IN 3	401 00	
20/	06 112	ALEXANDROS	TDANCACTION	N. R.	CHVI KIDV	341 00	+30266 103 0175
204.	04-112	SAMATIDIS T. ALEXIOS	TRANSACTION	7 NEOFYTOU ST.	CHALKIDA	341 00	+30222 108 2779/
205	00 100	CEDVANT.	SYSTEM SERVANT	7/ I/ALL IDDOLG CT	ATUENIC	117/1	+30222 108 2719
ZUJ.	99-100	SERVANT	YouR SERVANT	74 KALLIRROIS ST.	ATHENS	117 41	+30210 924 1800
000	0, 000	COURIER LTD.	AL DUA 00::-:	<b>74</b>	ATUENE	10/ 27	00010 500 5007
206.	04-003	SIAMOS N.	ALPHA COURIER	71 MARATHONOS ST.	ATHENS	104 35	+30210 520 3600/
		KONSTANDINOS					+30210 520 3601

A.A.	REG.NO.	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
207.	04-020	SOLDATOU	NEMESIS EXPRESS	95 KOLOKOTRONI ST.	PIRAEUS	185 35	+30210 417 2635/
		ANASTASIA	COURIER				+30210 417 2636
208.	03-025	SOUKIAS GRIGORIOS	FDS COURIER	195 ANALIPSEOS ST.	VOLOS	382 21	+30242 104 5100
209.	99-006	SOURLAS EVANGELOS	UNION MAIL	4C SOLONOS ST.	VOLOS	383 33	+30242 103 3785,
							+30242 102 4370/
							+30242 103 2464
210.	04-107	SPEED AIR	SPEED AIR	18 TEGEAS ST.	ARGIROUPOLI	164 52	+30210 995 1024,
		INTERNATIONAL					+30210 995 4403/
		TRANSPORTATIONS					+30210 994 0300
		LTD.					
211.	99-121	SPEEDEX COURIER S.A.	SPEEDEX	1-3 SIDIROKASTROU ST.	VOTANIKOS	118 55	+30210 340 7000/
							+30210 340 7034
212.	00-169	SPIRIDAKIS IOANNIS	SPIRIDAKIS IOANNIS	2 LACHANA ST.	IRAKLIO	712 02	+30281 028 3285,
							+30 281 034 2160/
							+30281 034 2160
213.	04-004	SPIROPOULOS & CO	ACHAIKES COURIERS	126 KORINTHOU ST.	PATRA	262 23	+30261 062 3072,
							+30261 027 7480/
							+30261 027 7480
214.	04-040	SPIROPOULOS	SPIR0P0UL0S	6 DAGLI ST.	KAVALA	654 03	+30251 062 0640/
		SAVVAS	SAVVAS				+30251 023 3200
215.	04-084	STAMOULIS IOANNIS	MEDIA PLUS	22 ODISSOU ST.	N. PSICHICO	115 25	+30210 691 6352/
							+30210 691 6359
216.	01-299	STANDZOS DIMITRIOS	STANDZOS	37 KARAGIAN-	LIVADIA	321 00	+30226 108 7580,
			DIMITRIOS	NOPOULOU ST.			+30226 108 7950/
							+30226 108 7951
217.	02-079	STAREX GROUP	STAREX GROUP LTD.	43 MESSINIS ST.	ANO GLIFADA	165 61	+30210 962 4003/
		ONE-PERSON LTD.					+30210 962 4000
218.	99-153	STATHI POLIXENI	STATHI POLIXENI	28 MERARCHIAS 7th ST.	KATERINI	601 00	+30235 103 3666/
							+30235 107 8910
219.	99-119	STATHOPOULOU D.	INTER CITY	19-21 MILON ST.	ATHENS	104 44	+30210 515 3896/
		& CO	COURIER				+30210 512 9885
220.	04-002	SYNETERISTIKI	SYNETERISTIKI	2-4 EYMILOU ST.	PATRA	262 22	+30261 034 2420
		COURIERS M. LTD.	M. LTD.				
221.	02-075	SYROKOS	SYROKOS	38 GRIVA ST.	AGRINIO	301 00	+30264 102 9789/
		ATHANASIOS	ATHANASIOS				+30264 102 9789
222.	04-018	TACHIDIMOSIEFTIKI-	TIPOS TACHI-	3 FRIGIAS ST.	N. IONIA	142 35	+30210 272 4085/
		TACHIMETAFORIKI-	DIMOSIEFTIKI S.A.				+30210 272 4086
		DIAFIMISTIKI-					
		TOURISTIKI-					
		NAFTILIAKI S.A.					
223.	04-015	TAGAROULIAS	TAGAROULIAS	45 LAKONIAS ST.	PIRAEUS	185 44	+30210 420 1931
		NIKOLAOS	NIKOLAOS				
224.	02-010	TAMBAKOPOULOS	TAMBAKOPOULOS	EM. PAPPA ST. &	VERIA	591 00	+30233 106 6600/
		NIKOLAOS	NIKOLAOS	72 VENIZELOU ST.			+30233 106 6605

A.A.	REG.NO.	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
225.	03-001	TARASIDOU & CO	EASY COURIER	148 AGCHIALOU ST.	PIRAEUS	185 44	+30210 463 7511/
							+30210 462 7034
226.	03-030	TASIOULAS V	TASIOULAS V	3 POULITSA ST.	IOANNINA	452 21	+30265 102 2611/
		BITCHAVAS CH. LTD.	BITCHAVAS CH. LTD.				+30265 102 2611
227.	02-058	TASKOS ANASTASIOS	TASKOS ANASTASIOS	4 IP. GIAKA ST.	EDESSA	582 00	+30238 102 7963/
							+30238 105 1171
228.	02-055	TASIOPOULOS	COYOTE SERVICES	240 I. DROSSO-	PATISSIA	111 41	+30210 201 9440/
		STAVROS		POULOU ST.			+30210 223 0186
229.	99-110	TNT SKYPACK	TNT	7 Z	ELLINIKO	167 77	+30210 894 0062/
		HELLAS LTD.					+30210 894 9895
230.	04-023	TOULIS DIMITRIOS	TOULIS COURIER	3 KRITIS ST.	ELEFTHERIO	563 34	+30231 076 3060/
							+30231 055 9191
231.	03-046	TOURLOS	TOURLOS	ADAMANDAS MILOU	MILOS	848 01	+30228 702 8033/
		PANAGIOTIS	PANAGIOTIS				+30228 702 2418
232.	99-146	TSAMBAS GEORGIOS	KINISI EXPRESS	6 IPSILANDOU ST.	ILIOUPOLI	163 41	+30210 996 4084/
							+30210 993 2213
233.	99-026	TSARMBOU EKATERINI	PACIFIC COURIER	21 ARISTODIMOU ST.	ATHENS	106 76	+30210 729 5137/
							+30210 729 5137
234.	04-039	TSIGARIDA KALLIOPI	TSIGARIDA KALLIOPI	19 ARI VELOUCHIOTI ST.	KARPENISI	361 00	+30223 708 0818/
							+30223 708 0818
235.	04-090	TSIKNAS GEORGIOS	LION COURIER	70 AFRODITIS ST.	ELLINIKO	167 77	+30210 964 9634/
							+30210 964 9634
236.	04-102	TSIMOS EVANGELOS	ART SPEED	8 VITSI ST.	SIKIES	566 26	+30231 063 0230/
							+30231 063 0230
237.	03-032	TSIRONI VASSILIKI	TSIRONI VASSILIKI	24 RIGA FEREOU ST.	AMALIADA	272 00	+30262 202 9777/
							+30262 203 8395
238.	99-096	TSITOTAS G. & CO	UNION MAIL	22 AERODROMIOU ST.	LARISSA	412 21	+30241 028 3565,
							+30241 028 5490/
							+30241 028 3925
239.	02-017	TSITSIMBIKOS	TSITSIMBIKOS	1 TALIADOUROU ST. &	KARDITSA	431 00	+30244 107 9400-2/
		VASSILIOS	VASSILIOS	KARAISKAKI ST.			+30244 107 9402
240.	03-041	TSOMBANIDIS	TSOMBANIDIS	15 LOCH.	ORESTIADA	682 00	+30255 202 2227/
		ANDREAS	ANDREAS	DIAMANTI ST.			+30255 202 2077
241.	99-051	TSOULOULIS AN.	TS0UL0ULIS	4 K. PIITI ST.	KAVALA	652 01	+30251 023 2623/
		IOANNIS	AN. IOANNIS				+30251 023 2623
242.	04-017	TZAVACHIDOU NINA	TZAVACHIDOU NINA	1 VAKCHOU ST.	THESSALONICA	546 29	+30231 055 6939/
							+30231 055 6939
243.	04-032	TZETOS MARIOS	TZETOS MARIOS	9 KLISTHENOUS ST.	KIATO	202 00	+30274 202 5135/
							+30274 202 6441
244.	02-011	TZIMI ATHINA	TZIMI ATHINA	55 ANAST.	ZAKINTHOS	291 00	+30269 504 9307
				TAVOULARI ST.			
245.	04-038	TZIMOPOULOS	TZHMOPOULOS	6 FARDIKAMBOU ST.	GREVENNA	511 00	+30246 208 7915/
		CHRISTOS	CHRISTOS				+30246 208 7916
246.	04-105	TZOKA DESPOINA	EXPRESS COURIERS	145 THIVON ST.	PIRAEUS	185 42	+30210 425 3909/
							+30210 425 3929

A.A.	REG.NO.	BUSINESS NAME	DISTINCTIVE TITLE	ADDRESS	CITY	PC	TEL./FAX
247.	99-120	UPS OF GREECE	UPS	43-45 EL.	GLIFADA	166 75	+30210 998 4000/
		INC.		VENIZELOU ST.			+30210 998 4199
248.	04-064	VAFIADOU CHARIKLIA	VAFIADOU	10 STIRON ST.	CHALKIDA	341 00	+30222 102 6632/
			CHARIKLIA				+30222 106 0534
249.	99-013	VAGIAS CHRISTOS	VAGIAS CHRISTOS	53A CHATZIARGIRI ST.	VOLOS	383 33	+30242 103 8928/
							+30242 103 8928
250.	04-060	VAGIAS PERIKLIS	TRANS ALL	21 K. PALAMA ST.	NIKEA	184 54	+30210 490 4787/
							+30210 490 4787
251.	04-092	VAKRATSAS	ON DAY	EVROU ST. &	KOZANI	501 00	+30246 104 0833/
		EVANGELOS		LORENDZOU MAVILI ST.			+30246 104 0833
252.	00-186	VASSILAKAKI	VASSILAKAKI	60 IOAKIM KAVIRI ST.	ALEXANDROU-	681 00	+30255 103 7879/
		ANASTASIA	ANASTASIA		POLI	551 55	+30255 103 7879
253.	99-058	VEVOPOULOS	IPIRO-TRANS-	42 G. PAPANDREOU ST.	IOANNINA	454 44	+30265 103 3777/
	00 000	ALEXANDROS	EPIRUS COURIER		107 11 11 11 17 1	104 14	+30265 103 3916
254.	02-068	VLACHOS GEORGIOS	ATHENS COURIER	46 EGALEO ST.	KORIDALLOS	181 21	+30203 163 3310
204.	02 000	VERGIOS GEORGIOS	AMENS COCKER	TO EURELO ST.	NONDALLOS	101 21	+30210 544 3774/
							+30210 544 8847
255	02-006	VOGINDROUKAS	VOGINDROUKAS	3 FILOTA ST.	SERRES	621 00	+30232 109 7717/
233.	02-000	KONSTANDINOS	KONSTANDINOS	STILOTA ST.	SERRES	021 00	+30232 109 77177
		& BROS	& BROS				+30232 103 7710
256	99-144	VOULGARI OURANIA	VOULGARI OURANIA	6 ORFANIDOU ST.	THESSALONICA	546 26	+30231 054 4847,
230.	33-144	VOOLOANI OONANIA	VOOLOANI OONANIA	O OIN ANIDOO ST.	ITIESSALUNICA	340 20	+30231 054 1172/
							+30231 054 4398
257	02.057	VDICANAZI IDINI	CDETA DOCT	17 CMIDII IOU CT	IDAKI IO	712.02	
257.	02-057	VRISANAKI IRINI	CRETA POST	17 SMIRILIOU ST.	IRAKLIO	713 03	+30281 025 3659/
250	04.050	VDICCANAVIC	CDETA COLIDIED	16 CIAMALAKI ST	IDAKI IO	712.02	+30281 025 3659
200.	04-059	VRISSANAKIS	CRETA COURIER	16 GIAMALAKI ST.	IRAKLIO	712 02	+30281 028 1020,
		MICH. EMMANOUIL					+30281 028 2520/
250	00 000	WORLD COURIER	WORLD COURTER	27 KADETAN	ATUENC	115.05	+30281 028 1020
259.	99-098	WORLD COURIER	WORLD COURIER	37 KAPETAN	ATHENS	115 25	+30210 675 6517-9/
260	0/ 052	(HELLAS) LTD.  XENOFONDIDIS D	(GREECE) LTD. XENOFONDIDIS D	CHRONA ST.	CDADTI	221.00	+30210 675 6909
260.	04-053			46 MENELAOU ST.	SPARTI	231 00	+30273 108 9389/
201	00.005	KOSTAS TH. LTD.	KOSTAS TH. LTD.	/ OLIAINIA AVE	CHALKIDA	2/1 00	+30273 108 9389
201.	99-025	XIDIS NIKOLAOS	XIDIS NIKOLAOS	4 CHAINA AVE.	CHALKIDA	341 00	+30222 108 7587/
202	02 021	ZAIDIC D	CDACE COLIDIED	/ ICIAC CT	ATUENIC	10/ /0	+30222 106 0699
<b>2</b> 62.	03-031	ZAIRIS D	SPACE COURIER	4 IGIAS ST.	ATHENS	104 46	+30210 825 9676/
	00.000	ZORGIANOS CH. LTD.	7441415715 05050105	07.041/4.04	DUADES	054.00	+30210 825 9676
263.	02-072	ZANNETIS GEORGIOS	ZANNETIS GEORGIOS	87 CANADA ST.	RHODES	851 00	+30224 107 4229,
							+30224 103 0917/
001	00.171	ZADIFICAL A CO	CMUET MAN	E4 ACTIDALIANTOS CO	ATUENIC	110.05	+30224 107 4229
264.	99-141	ZARIFIS N. & CO	SWIFT MAIL	71 ASTIDAMANTOS ST.	ATHENS	116 35	+30210 725 6600/
		<b></b>	EXPRESS COURIER				+30210 722 5963
265.	04-042	ZIAMBRAS P	CENTER	1 PLATEON ST.	KOZANI	501 00	+30246 102 8288, 4206/
		DELIGIANNIS I. LTD.	COURIER LTD.				+30246 102 8225
266.	01-205	ZOUROUDI GEORGIA	ZOUROUDI GEORGIA	10A AP. PAVLOU ST.	RHODES	851 00	+30224 106 5142, 5832/
							+30224 106 5142

### **APPENDIX VI.**

### **EETT Website Map**



#### **ABOUT EETT**

- What is EETT
- > Structure
- Responsibilities

### **TELECOMMUNICATIONS**

- Licensing
- Numbering
- ➤ Wireless Communications
- Local Loop Unbundling (LLU)
- > Regulations
- > Interconnection
- ➤ Electronic Signatures
- Domain Names
- ➤ UMTS- 3<sup>rd</sup> Generation Mobile Telephony
- Universal Service
- > Telecommunications Equipment
- ➤ European Commission Reports

#### **POSTAL SERVICES**

- > Introduction to Postal Sector
- ➤ Register of Postal Service Operators

#### **SEARCH**

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#### **ANNOUNCEMENTS**

Announcements

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➤ Links

#### **CONTACT EETT**

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#### **PUBLICATIONS**

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- Meetings Activities
- ➤ EETT Proceedings

#### **SITE MAP**

Site Map

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# **APPENDIX VIII.**

## Glossary

TERM	EXPLANATION
Accompanying Courier Note (ACN)	A form attached to the postal item containing identification details.
Authorized Carrier (AC)	A carrier performing the necessary control to ascertain compliance or non-compliance of a Certification Service Provider (CSP) to the Voluntary Accreditation (VA) criteria. The AC is selected by the CSP from a list of carriers designated by EETT.
Bottom-up Model	Technical-economic model which calculates the network cost considered to be efficiently designed in terms of topology, technology, etc. It is used to calculate the cost of services, based on the cost of separate network elements required for the provision of the specific services.
Call Termination	The telecommunications service where one of the contracting parties (the one providing the service) terminates to its network a call coming from the network of the other contracting party.
Carrier Pre-Selection	The option given to OTE subscribers, if they so wish, to select as a default the Provider 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 or 5-digit code, as in the case of Carrier Selection.
Carrier Selection	The option offered to OTE subscribers to make calls through another Provider by dialing a special 4-digit or 5-digit Carrier Selection Code assigned to the specific Provider before the desired number.
Certification Service	Individuals or legal entities or other carriers issuing certificates or providing other
Providers (CSP)	services, with respect to the Electronic Signatures.
Charter of Obligations to	The undertakings providing postal services under a General Authorization must
Consumers (COC)	prepare a COC to include (a) description of characteristics of the provided service and the time limits within which it is provided, (b) information for users about prices, based on the data affecting them including expected improvement of service quality, (c) the Dispute Resolution Committee with the participation of a users representative and right of attendance for the interested user (consumer). The COC also contains all other necessary information in relation to the characteristics of the postal undertaking, the obligations and commitments to users, the management of postal items, user service and potential compensation.

Common Cost	The cost which is jointly assigned to various telecommunications services on a long-term basis. The identification of common cost is based on the minimum
	number of network elements required for full operation of the
	telecommunications network and the total number of network elements required
	on the long-run for full network operation.
Comprehensive Directory	The directory including fixed and mobile telephony numbers of all Providers'
	subscribers.
Current Cost	Refers to the valuation of various assets of the enterprise, based on equivalent
	present value.
Dependent Stations	Earth stations whose access to the space part is performed under the control and
(in satellite services)	surveillance of an infrastructure station.
Digital Certificate	Electronic certificate (electronic file), which connects signature verification data
	with a person and ascertains identity.
Dispatch	The service in which one of the two contracting parties dispatches a call from the
	network of the other party to a third party network.
Dispute Resolution	Special committee convened for the resolution of disputes arising between a
Committee	postal undertaking and users. The Committee meets under the responsibility of
(in the postal services	the postal undertaking, with the necessary participation of a users representative,
sector)	while the concerned user (consumer) may also attend.
	An alphanumeric element which individualizes a computer connected to a
Domain Names	network or group of computers connected to a network, according to the
	principles of the Internet Domain Name System.
Earth Infrastructure	Earth stations with control and monitoring devices, constituting the cores for the
Stations	provision of satellite services. Examples of this category are radio-television
(in satellite services)	broadcasting stations, HUB stations in VSAT TDM/TDMA network, etc.
E-Spectrum	Electronic application for the submission of radio spectrum use applications for
	the needs of the Olympic Games, published on the ATHOC 2004 website. Through
	this application, interested radio frequency users could be informed about the
	applicable radio frequency licensing regime, submit their applications and follow
	up their processing on the Internet.
Fly Away	Easily transported equipment that allows rapid satellite connection in distant
	areas for data, sound and image transmission.

Free Call Service	Call for which the caller is not charged.
Frequency Assignment	Authorization provided to a person already holding an Individual Licence, for the commencement of use of a specific radio frequency or a specific radio electric channel by a radio electric station, at a particular location and with particular technical characteristics, according to the conditions described in the Individual Licence.
Fully Distributed Cost (FDC)	Costing Method based on witch all cost elements are allocated to the products using a number of appropriate algorithms.
Geographic Numbers	The numbers whose prefix denotes the geographic location of the number holder.
GSM-Gateways	Terminal devices connected to call centres for the purpose of transforming fixed to mobile calls into mobile to mobile calls. This transformation is achieved using SIM cards installed in the GSM-gateways.
Historic Cost	The amounts paid by the Provider for the purchase of various fixed assets (e.g. active network equipment, plots, buildings, cables, computers, etc). This information is stored in the accounting records of the Provider and appears in the official accounting statements (balance sheets and operating results).
Individual Courier Agreement	Agreement made between the postal undertaking and the user for the urgent transfer of one or more postal items. The agreement states the terms and conditions on which the postal undertaking assumes the movement of the postal item.
Interconnection	The physical and logical connection of telecommunications 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.
Interference	The result of an unwanted action due to one or more transmissions, radiations or inductions during reception to a radio system, demonstrated as any fall in performance, wrong interpretation or loss of information, which would have been received had this unwanted action not taken place.
Long-Run Average Incremental Cost (LRAIC)	It is the cost difference between the total provider cost and the cost that the provider will have when providing all of its services except for the specific service.
Long-Run Incremental Cost (LRIC)	The long-run incremental cost of a service is the cost difference that results from the total cost of a provider when excluding all offered services cost except for the specific service. It is one of the main approaches for cost calculation (Costing Models).

Market Failure	The lack of effective competition in a market.
Mobile Service	Radio service between Mobile Stations and Land Stations or between Mobile Stations.
National Incoming Traffic	The total traffic terminating to a Provider network, originating from the networks of other domestic fixed or mobile telephony Providers.
National Outgoing Traffic	The total traffic originating from a Provider network, terminating to the networks of other domestic fixed or mobile telephony Providers.
National Radio Frequencies Registry (NRFR)	Database including all radio frequencies assigned at national level.
National Voluntary Accreditation Scheme	The regulatory framework and procedures which specify the method of accreditation and the level of services provided by Electronic Signature Certification Service Providers (CSP) wishing to be accredited by EETT. Moreover, it refers to the operating framework, the procedures and requirements to be met for the identification of bodies providing Voluntary Accreditation (VA) to interested CSPs.
Non-geographic Numbers	All numbers except geographic ones, namely the numbers whose prefix does not denote the geographic location of the holder.
Number Portability	The option provided to consumers to maintain their telephone number when changing Provider.
Premium Rate Service	A call with charge higher than the maximum charge for the other geographic numbers in the country. Part of the increased charge is incurred by the called party which has been assigned the specific number.
Private Accreditation Authority	The hardware/ software and the necessary infrastructure for the issue and management of certificates that are exclusively used for the internal needs of an organization.
Qualified Certificate	Electronic certificate which connects electronic signature data with a person and verifies identity. Moreover, it is issued under particular circumstances in order to be equally valid with standard signature.
Radio and Telecommunications Terminal Equipment (RTTE)	See Radio equipment, Telecommunications Terminal Equipment.
Radio Equipment	Equipment which includes transmitter and/ or receiver and provides communication through radio waves with the use of spectrum.
Radio Location	The identification of the location, speed and other characteristics of an object with the assistance of radio electric wave dissemination properties.

Radio Service	A service including transfer, transmission and/ or reception of radio waves for
	special telecommunications purposes.
Reference Interconnection	The reference document used as a basis for the Interconnection contract among
Offer (RIO)	OTE and other Providers. This document is released by OTE and approved by
	EETT.
Reference Unbundling Offer	The reference document used as a basis for the contract signed for LLU provision
(RUO)	by OTE to other providers. This document is released by OTE and approved by
	EETT.
Retention Fee	It is related to calls originated from the telephony network of Provider A and
	terminated to the network of another Provider B (fixed or mobile).
	In these cases, the retail price charged by Provider A consists of two parts. The
	first is the call termination fee, as specified by Provider B and paid by Provider A
	to Provider B. The other part is a fee corresponding to the transfer cost of the call
	to the network of Provider A (up to the interconnection point). This specific part of
	the charge, retained by Provider A, is the retention fee.
Satellite Services	Services whose provision is based in whole or in part on the installation and
	operation of earth satellite stations networks. These services include, as a
	minimum, radio link via earth satellite stations with the space part (uplinks) and
	radio link between the space part and earth satellite stations (downlinks).
Secure Devices	Hardware owned exclusively by the person signing electronically and through
	which the uniqueness and the secrecy of the electronic signature are ensured.
Shared Access Service	A call whose cost is shared between caller and called, given that the charge does
	not exceed the maximum normal charge of a national call.
Significant Market Power	An enterprise is considered to hold a Significant Market Power (dominant
(SMP)	position), when it is holding financial power which enables it to operate to a great
	extent independently from the competition, the customers, and the consumers.
	(either individually or in collaboration with other enterprises),
Special Postal Items	Information system for the tracking and tracing of postal items,
Special -Track and Trace-	
System (PISTTS)	
Special Urgent Dispatch of	The dispatch of postal items with special handling, time and delivery
Postal Items	characteristics, which are offered to users (of postal services) to meet their needs.
Telecommand	The use of telecommunications for the transmission of signals with the aim to
	operate, modify or terminate the operations of a device from a distance.
Telecommunications	Equipment intended to be connected directly or indirectly by any means
Terminal Equipment	whatsoever to telecommunications networks (mobile telephony networks, public

# **APPENDIX IX.**

### **ABBREVIATIONS**

3 <sup>rd</sup> CSF 3 <sup>rd</sup> Community Support Framework
AC Authorized Carrier
ACN Accompanying Courier Note
ADCO Administrative Cooperation Group
ADSL Asymmetric Digital Subscriber Line
AIAAthens International Airport
AOB Athens Olympic Broadcasting
ASE Athens Stock Exchange
ASEP Supreme Council for Personnel Selection
ATHOC Athens 2004 Olympic Games Organizing
Committee
CAA Civil Aviation Authority
CB Citizen Band
CCCurrent Cost
CETZControlled Entrance and Traffic Zones
CLI Calling Line Identification
COC Charter of Obligations to Consumers
COCOM Communications Committee
CoS Council of State
CPI Consumer Price Index
CPS Carrier Pre-Selection
CPZControlled Parking Zones
CSP Certification Service Provider
CSS Consumer Service Sector
DSC Digital Selective Call
EBU European Broadcasters Union
ECC Electronic Communication Committee
EDVExpress Delivery Voucher
<b>EETT</b> Hellenic Telecommunications and Post
Commission
ELTAHellenic Post
ENG/OBElectronic News Gathering/ Outside
Broadcasting
ERG European Regulators Group
ERT Hellenic Radio and Television
ETSI European Telecommunications Standard
Institute
EUEuropean Union
FAQ Frequently Asked Questions

ED Fine Duimade
FB Fire Brigade  FCC Federal Communications Committee
FDC Fully Distributed Cost
FESA Forum of European Supervisory
Authorities for Electronic Signatures
FMSFixed Monitoring Stations
FORTH-ICSFoundation for Research and
Technology Hellas- Institute
of Computer Science
FWA Fixed Wireless Access
GALTP Greek Association of Licensed
Telecommunications Providers
GBUGreek Banks Union
GCPIGeneral Consumer Price Index
GRNET Greek Research and Technology
Network
<b>HAEC</b> Hellenic Atomic Energy Commission
HNDGSHellenic National Defense General
Staff
HNGS Hellenic Navy General Staff
HNMSHellenic National Meteorological
Service
HPHellenic Police
IBC International Broadcasting Center
IISIntegrated Information System
IOC International Olympic Committee
IPC International Post Corporation
IRG Independent Regulators Group
ISDNIntegrated Services Digital Network
ISPs Internet Service Providers
IT Information Technology
ITUInternational Telecommunication
Union
JCJapan Consortium
JMD Joint Ministerial Decision
LLULocal Loop Unbundling
LRAICLong Run Average Incremental Cost
LRIC Long-Run Incremental Cost
MDMinisterial Decision

MEPPPW . . . . . Ministry of Environment, Physical PIBs .....Principles of Implementation and Best Planning and Public Works Practice MM .... Mass Media PMR .... Private Mobile Radio MMS .... Multimedia Message Service PPC .....Public Power Corporation MPC . . . . . Main Press Center **PSTN** . . . . Public Switched Telephone Network RIO .....Reference Interconnection Offer MTC ....Ministry of Transportation and Communications RRC . . . . . Regional Radiocommunication Conference MTO . . . . . Mobile Telephony Operator RSC . . . . . Radio Spectrum Committee NAMCR ... National Antenna Mast Construction RSPG . . . . Radio Spectrum Policy Group Registry RTTE .... Radio and Telecommunications Terminal NATO . . . . North Atlantic Treaty Organization Equipment NBC . . . . . National Broadcasting Corporation RUO . . . . . Reference Unbundling Offer NCC ..... National Control Centre SIM .....Subscriber Identification Module NFAC . . . . National First Aid Centre SLA ..... Service Level Agreement SMP . . . . . Significant Market Power NFAT . . . . National Frequency Allocation Table NO .....Notified Operator SMS . . . . . Short Message Service NP .....Number Portability SNG . . . . . Satellite News Gathering NRA . . . . . National Regulatory Authority SPITTS ... Special Postal Items Track and Trace NRDNP ... National Reference Database on Number System Portability SRDs . . . . Short Range Devices NRF . . . . . New Regulatory Framework TCAM . . . . Telecommunications Conformity NRFR ... National Radio Frequencies Registry Assessment and Market Surveillance Committee NRTC . . . . National Radio Television Council **NSMMS** . . National Spectrum Management and TCP/IP ... Transmission Control Protocol/Internet Monitoring System Protocol NSS . . . . . National Statistical Service of Greece TOC .....Technology Operation Center NTUA . . . . National Technical University of Athens TPPI .... Total Presumable Productivity Index US ......Universal Service OAKA ... Athens Olympic Sports Complex **OECD** . . . . Organization for Economic Co-operation USA . . . . . United States of America USP . . . . . Universal Service Provider and Develompent OGSD . . . . Olympic Games Security Division VA ......Voluntary Accreditation **OMC** . . . . . Olympic Monitoring Centre VOIP ....Voice Over IP VPN .....Virtual Private Networks ONU . . . . Optic Network Units OP IS . . . . Operational Program **VSAT** . . . . Very Small Aperture Terminals Information Society WGs . . . . . Working Groups **OSC** . . . . . Olympic Security Centre Wi-Fi . . . . Wireless Fidelity **OTE** .....Hellenic Telecommunications WLAN ... Wireless Local Area Network Organization WTSA ... World Telecommunications PD ......Presidential Decree Standardization Assembly