

Annual Report 2006

Maroussi 2007



EETT

HELLENIC TELECOMMUNICATIONS & POST COMMISSION



Administration

The present Annual Report refers to the activities of the Hellenic Telecommunications & Post Commission (EETT) for the period from January 1st until December the 31st 2006. During this period the composition of EETT appeared as follows:

A. Composition of EETT for the Period January 1st - December 31st 2006

NIKITAS ALEXANDRIDIS

PRESIDENT

NIKOLAOS KOULOURIS

VICE-PRESIDENT FOR THE ELECTRONIC COMMUNICATIONS SECTOR

THODORIS DRAVILLAS

VICE-PRESIDENT FOR THE POSTAL SERVICES SECTOR

PANAGIOTIS KOTTIS

MEMBER

IOANNIS PALEOLOGOS

MEMBER

SYMEON PAPAVALSILEIOY

MEMBER (JUL. 2006-DEC.2006)

MICHAEL SAKKAS

MEMBER

PANAGIOTIS TSANAKAS

MEMBER

GEORGIOS TSAPROUNIS

MEMBER

ALKIVIADES CONSTANTINOS PSARRAS

MEMBER (JAN. 2006-JUL.2006)

Message from the President

2006 was a year of significant developments in the Telecommunications and Postal Services Sector as EETT's administration undertook decisive actions and interventions at both a regulatory and a supervisory level. This year, the enactment of the new law 3431/2006 constituted a landmark for Electronic Communications. The new law provides all necessary tools for EETT to perform its regulatory and supervisory task and to further boost competition.

In addition, in the context of the new Law, during 2006, EETT completed at a very high speed the 'market analysis', meaning the analysis of competition for all the 17 Electronic Communications markets, in accordance to the national and european framework. EETT following the aforementioned process, first determined all relevant markets and analysed their level of competition and, followingly, in cases where it identified lack of effective competition, EETT designated the provider or providers with SMP on the related market and imposed on these providers such specific regulatory obligations as it considered appropriate. As it has been mentioned in the 12th Implementation Report, EETT has imposed the whole of the necessary remedies.

Since August 2005, when the new administration of EETT took up its tasks, the basic goal has been the undertaking of a dynamic and strategic role for the dissemination of broadband services in our country. I ascertain with satisfaction that this goal is being fulfilled and that the coordinated actions of EETT bring the first positive results.

It is worth mentioning the great effort that EETT launched for the penetration of Physical Collocation which resulted to the increase of the number of OTE's local exchanges to 38 at the end of 2006 comparing to only 1 in September 2005. This effort will intensify in 2007, and the goal is the number of Local Exchanges

with physical collocation facilities to overpass the 150 Local Exchanges at the end of 2007.

EETT corresponding to its task for further development of broadband services, alternative network infrastructure and the provision of innovative Electronic Communications Services to Greek citizens, proceeded to the assignment, through auction, of the last remaining Radiofrequencies Right of Use in the zone of 3,5 GHz. This radiofrequency zone is advisable for the development of wireless networks, the implementation of which is fulfilled through the Wi-MAX technology networks. Till now, there have been important delays in the expansion of services provided by the aforementioned networks. However the Wi-MAX technology is expected to boost the development of the Fixed Wireless Access Networks in the following years.

Moreover, 2006 was a year of preparation for the Local Loop Unbundling (LLU) which resulted in the increase of the number of local loops from 7,000 in the beginning of 2006 to 110,000 local loops in which the alternative operators had access at the end of this year. The issuance of the new Reference Unbundling Offer (RUO) for Local Loop in April 2007, initiated a new era for Electronic Communications of our country, in a totally liberalised infrastructure environment, which will act beneficially both for the quality and the cost of services. EETT's estimation is that till the end of 2007 the total number of loops/subscribers will overpass the 600,000.

The market of electronic communications in 2006 was characterized by important reforms in the field of mergers and acquisitions. EETT undertook the responsibility to examine significant agreements, setting the terms that ensure effective competition. During 2006, EETT has taken important actions for the protection, provision of information and training

of consumers. In this context, EETT encountered a series of issues regarding Carrier Pre-Selection, undertook measures for the protection of consumers from dialers, organised congresses/meetings for broadband services, as well as issues mobile telephony antennas. All these actions were only some of the efforts that EETT undertook during 2006.

In the Radio Spectrum Sector, EETT, inter alia, placed further emphasis on the issuance of an explicit and flexible framework of granting radiofrequency rights of use, intensified site inspections for the control of the legitimacy of the installed antennas and many important operations of shutting down illegal stations have taken place.

For the Postal Services Sector, the main issues in 2006 were increased audits to licensed postal companies which aimed at the minimisation of possible illegal activity, the provision of high quality services to consumers and a healthy and competitive environment for the operation of the market. The focal point of EETT was also to ensure quality of Universal Service. In this context, EETT carried out quality measurements of the provided postal services, continued the follow-up of the cost of services provided to the end user and in parallel, continued the investigation and management of users complaints.

Concluding I would like to note that this Report, which presents an overall picture of EETT's action during 2006, shows that the preparation and incorporation of the European legal framework to the Greek legislation has come to an end and that the new and more important issue of the proper and effective application of the new national legal framework is now arising. The success of this new phase is considered to be very crucial for the further economic development of the country, mainly through the new information and communication technology.

Within this context, in the year 2007, which has been named by the Prime Minister as year of broadband services, EETT has set as separate strategic goals (a) ensuring and increasing competition on the broadband infrastructures (with main emphasis to the broadening of LLU) and (b) controlling the quality of the services offered by all the telecommunication providers.

Furthermore, in the context of its programme of actions for the year 2007, EETT will act on the basis of the following guidelines:

1. Creating dynamic and informed consumers, through information and consumer protection actions, so that consumer is able to make deliberate choices.
2. Highlight the quality characteristics of the services/products offered, as well as transparent and reliable presentation to consumer. The consumer faces a number of new/innovative technological and commercial offers and should be able to compare, apart from the cost, the quality, on the basis of commonly accepted quality indicators.
3. Creating a modern EETT, which has to be extrovert, dynamic, flexible and effective in order to complete its role, as well as to maintain a working environment adequate to attract and maintain staff of high quality.

Under the new developing environment, EETT has to complete a very crucial role. EETT will continue its work and will intensify its regulatory and supervisory actions, offering its experience and regulatory tools for the development of digital communications and the Greek economy.

Professor Nikitas Alexandridis
EETT President

May 2007

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Introduction

Introduction

Telecommunications Sector

For the year 2006 the actions of EETT focused on four points: i) the complete harmonization of the Greek legislation with the European regulatory framework, ii) the analysis of the relevant Electronic Communications markets according to the new European framework, iii) the further development of the Electronic Communications market, with emphasis on broadband services and iv) the protection of healthy competition and interests of consumers.

More analytically, in the beginning of 2006, the new law on Electronic Communications, L.3431/2006 was published, the provisions of which determine the framework for the provision of Electronic Communications networks and services and incorporate the relevant European directives in the Greek legislation. In addition, in the context of adapting the existing secondary regulatory framework to the provisions of the new law, EETT completed the elaboration of the majority of Regulations, that needed to be published, as well as the Recommendations to the Ministry of Transportations and Communications (MTC), in order to achieve the harmonization of the Greek legislation with the new European Regulatory Framework.

In parallel, EETT corresponded with success to the task, set by L.341/2006, of analyzing the relevant Electronic Communications markets. The definition and analysis of all the relevant Electronic Communications markets was accomplished, the suggested draft measures were notified to the European Commission and by EETT Decisions, the regulatory obligations that were suggested by the draft measures, were imposed to the companies with Significant Power in the markets concerned.

EETT has also taken action for the further development

of the Access market and the Broadband Services market. The procedures of Co-locotion and Local Loop Unbundling (LLU) continued their evolutional course and this fact is reflected, on one hand, in the significant increase of the natural co-installation sites and the available loops and on the other hand, in the reduction of the fees of the aforementioned services. The significant reductions of the prices of large capacity wholesale Leased Lines are also expected to have a positive contribution in the growth of the broadband markets.

At the same time, high priority was given in the development of wireless and wired infrastructures. EETT, in its effort to promote the growth of alternative access infrastructures, contributed in the simplification of the licensing procedures for Wireless Networks W-LAN and proceeded to the assignment, through auction, of the only available Radiofrequencies Right of Use in the zone of 3.5 GHz, for the development of Wi-MAX technology networks. Moreover, particular emphasis was given in the definition of the provisions, that regulate the rights of way, given their importance for the development of alternative networks.

EETT has taken action for the promotion and protection of competition in the Electronic Communications networks and services as well as for the safeguard of the interests of consumers. In this context, EETT encountered a series of issues that emerged in the fields of Carrier Pre-Selection and the cost estimating audits of OTE. In parallel, EETT made important steps towards a more effective operation of the certification services for Electronic Signatures and of the Universal Telephone Directory. Finally, EETT organized and carried out audits on telecommunication companies, contributing to the providers' compliance with the legislation in force and generally to the protection of consumers.

Radio Spectrum Sector

The main priority of EETT in the Radio Spectrum Sector was to lay down an explicit and flexible framework of licensing and use of the radio spectrum, based on the competences that arise from the new L.3431/2006.

For this purpose, great importance was given in the issuance of the Regulations set in the new Law, so that the procedure of granting radiofrequencies rights of use may become more homogeneous and flexible. In particular, the Regulation on the Use and Granting of Rights of Use minimizes the administrative restrictions that are imposed to the use of radiofrequencies for the operation of an Electronic Communications network under a General Authorisation regime. At the same time, the procedure, the criteria and the duration of the granted rights of use become more concrete. Furthermore, the Regulation on the Terms of Use of Radiofrequencies defines with accuracy the technical terms for the use of individual radiofrequencies or zones of radiofrequencies, in order to make known in advance for which of radio-communications services and with which technical characteristics the rights of use may be granted. In this way, an environment that favors the use of radiofrequencies for the development of new appliances and services is formed.

Concerning the licenses of antenna constructions that are used for the provision of wireless Electronic Communications networks under a General Authorisation regime, with the new Regulation on Antenna Mast Constructions Licenses, the licensing procedure has been adjusted to the provisions of L. 3431/2006, which requires the Approval of Environmental Terms (AET) before the issuance of the antenna construction license. For the full implementation of the new procedure, a Decision of the Ministry of Environment, Physical Planning and Public Works needs to be issued. This decision shall define the context and

specify the procedure of the Environmental Effects Study. It must be noted that, without a flexible framework for the licensing of antennas, the development of new wireless applications and services and the expansion of the already existent may not be accomplished.

In 2006, hardly any antenna license was issued, since it was not possible to acquire, for each application filed to EETT, the necessary AET. As a result, there were important delays in the expansion of the already existent networks and the suspension of new, such as the Wi-MAX networks.

Concerning the granting of radiofrequencies rights of use, there was a diminution of the total annual number of assignments, as it is presented in detail in the relevant chapters that follow, given that, during the provisional period that preceded the issuance of the new Regulation, no rights of use were granted.

In 2006, in the field of spectrum monitoring, EETT focused, on the control of the lawful operation of those spectrum functions that have been known to cause most of the interference problems, a characteristic example of which is the interference of radio and television stations. The audit resulted in the submission to EETT, of applications for the granting of the relevant rights of use. In parallel, after the submission of complaints the audits continued in all the spectrum of frequencies, and so did the on site inspections for the control of the legitimacy of the antennas installed. The actions for the elimination of the interferences in the spectrum that is used in services related to the safety of human life as well as national security and emergency networks (networks of Civil Aviation Authority, Port Police etc.) were also successful. Furthermore, in the frame of fully establishing the legitimacy in the field of Radiofrequencies Spectrum, many important operations of shutting down illegal stations have taken

place, in co-operation with the co-competent authorities.

Finally, during 2006, EETT continued the audits in the market of Radio Equipments and Telecommunication Terminal Equipment (RTTE) and issued recommendations for the circulation of equipment that is not compliant with the legislation in force, aiming to avoid harmful interferences and to protect security and health of users.

Postal Services Sector

In 2006, the Directorate of Postal Services of EETT completed the successful licensing of a significant number of new coming providers in the postal sector, proceeded to a series of regular, unscheduled and remote special audits to already licensed postal companies, while, at the same time, registered the quantitative and qualitative characteristics and the tendencies of the Greek postal market. Having the consumer as a focal point, EETT carried out in 2006, quality measurements of the provision of postal services by the Universal Service Provider (USP) in cooperation with an international company.

Both the regular and the remote special audits that took place in a series of postal companies under a General Authorisation/Individual License, aimed firstly, at detecting the possible provision of deficient postal services to the final consumers and secondly, at examining the compliance of the operation of the company under control with the provisions of the legal regime. The unscheduled audits aimed at the detection of a possible illegal activity. At the same time the total of postal services user complaints was examined. In many cases, the results of the audits and the examination of the complaints led to the process of Hearings, aiming at the resolution of problems, which were discovered in the operation of the market and the imposition of

sanctions in those cases, judged as necessary. To summarize, the goal of the audits was to reassure a healthy and competitive environment for the operation of the market, in favor of consumers.

The quality measurement of postal services, provided to the end users, was also one of the first concerns of EETT in 2006. The quality measurements of 1st priority domestic mail continued. These measurements aim at estimating the time of delivery to the final consumer of his personal mail, no matter where it comes from, within the country limits, and at appreciating the reliability of the services of the USP to the residents of the country. Respective quality measurements for the mail are held by the IPC (International Post Corporation). The results of the domestic measurements show an improvement of the Universal Service (US) quality in 2006 in comparison to 2005. Nevertheless, the quality of the services provided in 2006 falls short of the quality specifications, as these are described in the new Ministerial Decision (MD) 28977/81 I/2006 that replaced MD 79293/2000. Besides, the new MD sets the criteria according to which some regions of the country may be excluded from the regularity of provision of postal services by the USP.

Finally, in 2006 EETT continued the follow-up of the courier market with regard to volume, income, infrastructure, recording of ways of resolution of differences with the consumers and the estimate of tendencies of the market for the next three-year period.

European and International Collaborations

In 2006, EETT continued its activity in the field of European and international collaborations. EETT actively participated in the work of the European Regulators Group (ERG) and the Independent Regulators Group (IRG), in the Session of CERP (Comité Européenne de Reglementation Postale) and in other official committees.

EETT also, contributed in the 12th Report of the European Committee, producing the necessary data concerning the Electronic Communications market in Greece.

At an international level, EETT participated in congresses and meetings and concluded bilateral collaborations.

Other Actions

In 2006 EETT continued its actions towards the recruitment of high level personnel. In this frame, a contest for the engagement of 16 Special Scientists, who shall enforce considerably its executive personnel within the first half of 2007, was completed. At the same time strong efforts were made to brief and train the personnel on issues of their specialty and their object of work.

During 2006, the realization of the Integrated Information System (IIS) of EETT began. It is a critical and complicated work that is expected to upgrade the operation and the provided services of EETT. In parallel, EETT proceeded in the reformation of its web site aiming at its upgrade as a functional tool of briefing and communication with the collaborating institutions and the general public.

Also, in 2006 EETT continued the realization of its projects that had been included in the Operational Program for the Information Society (OPIS) of the 3^d Community Support Frame (3^d CSF).

In the Chapters that follow EETT's actions per sector are presented more analytically, as well as the information that confirms the positive results of EETT's interventions in the Electronic Communications and Postal Services markets during 2006.





**The New Law 343 I/2006
on Electronic Communications**

I. The New Law 343 I/2006 on Electronic Communications

In the beginning of 2006 the new law on Electronic Communications, L.343 I/2006, which replaced the - formerly at force- L.2867/2000, was published in the Government Gazette¹. The provisions of L.343 I/2006 determine the context for the provision of Electronic Communications networks and services, incorporating at the same time, within the Greek legislation the Directives: 2002/19/EC, 2002/20/EC, 2002/21/EC, 2002/22/EC and 2002/77/EC.

In the new law, as in the former L.2867/2000, it is provided that EETT regulates and supervises the Electronic Communications market, while the competences of EETT as well as of the Ministry of Transportations and Communications (MTC) are defined analytically. The Ministry continues to be responsible for tracing the policy in the field of Electronic Communications.

Law 343 I/2006 contains detailed provisions that regulate all the subjects related to the Electronic Communications market, for example, the terms and conditions of the operation of companies that provide network and services, the management and monitoring of the Radio Frequencies Spectrum, the rights of way, the licensing for the antenna constructions, the Access and Interconnection to networks, the Universal Service (US) and others. Furthermore, it describes the administrative procedures in relation to the imposition of sanctions by EETT on persons that violate the legislation on Electronic Communications and free competition.

I.1. Competences of EETT according to the New Law 343 I/2006

The competences of EETT are described in article 12 of L.343 I/2006 "Electronic Communications and other provisions". Among others, EETT has the following competences:

- Supervises and controls the providers of networks and/or services of Electronic Communications and imposes the relevant sanctions.
- Publishes Codes of Conduct for the provision of Electronic Communications networks and services as well as for the relative facilities and services.
- Provides its services for the resolution of differences that occur from the application of the Law on Electronic Communications.
- Oversees the observation of the legislation on Electronic Communications and applies the provisions of L.703/1977 ("for the control of monopolies and oligopolies and the protection of free competition"), as it is in force, in relation to the exercise of activities of Electronic Communications companies, as well as the provisions of articles 81 and 82 of the Treaty of Rome, according to the Regulation 1/2003/EC (L 001), asking for the contribution of the Competition Commission, in cases where it judges necessary. More specifically, EETT:
 - (i) Examines the agreements, decisions and all forms of harmonized practices of the Electronic Communications companies,
 - (ii) Controls and prohibits the different forms of abusive exploitations of a dominant position that are presented in the market in question,
 - (iii) Controls the concentrations of the Electronic Communications companies,
 - (iv) Has all the powers and the rights to address directives, prohibitions and recommendations, to impose fines and other administrative sanctions, in case of infringement of the provisions of L.703/1977, as well as in the case of refusal of provision of information or hindrance to the work of EETT.
- Keeps the National Radiofrequencies Registry and the Registry of Providers of Electronic Communications networks and services.
- Manages the Radiofrequencies or zones of the Radiofrequencies spectrum, within its responsibility.
- Monitors and controls the use of Radiofrequencies

¹ GG Issue 13/B/03-01-2006.

Spectrum and imposes the relevant sanctions. For this purpose, EETT installs permanent Spectrum monitoring stations in order to achieve more effective Spectrum monitoring.

- Manages the National Numeration Plan (NNP). Assigns, engages, revokes or limits the rights of use of numbers or group of numbers, according to the principles of objectivity, transparency and non discrimination. Supervises the application of the NNP and determines the fees for the assignment, engagement and use of numbers.
- Regulates the issues of Number Portability and of Carrier Selection or/and Pre-Selection and controls their application.
- Regulates the issues with [.gr] suffix Domain Names, as well as of every other domain or subdomain that may be granted to Greece.
- Regulates by its Decisions the issues of Electronic Signatures and supervises the providers concerned.
- Regulates the Access and the Interconnection, issuing regulative acts, in all cases required.
- Exercises the competences relative to the provision of the Universal Service (US).
- Regulates the issues concerning the protection of consumers in the field of Electronic Communications, issuing relevant regulative Acts. For these matters, EETT cooperates with the General Secretary of Consumer Protection of the Ministry of Development and consults with consumers, users and service providers' organizations.
- Grants Licenses for the Antenna Mast Construction Stations, according to the provisions in force.
- Is responsible for the matters that concern the conditions of use and placing on the market of terminal equipment and radio equipment.
- Regulates every matter that concerns the determination of the relevant markets of Electronic Communications products or services in the Greek territory and proceeds to the analysis of the effectiveness of competition. Regulates every matter

that concerns the definition and the obligations of the Providers with Significant Power in the relevant markets and may request the aid of the Competition Commission in all the cases it judges necessary.

- Cooperates and exchanges information with every competent public authority, specially the MTC, the Competition Commission, the National Radio - Television Council (NRTC), the Personal Data Protection Authority (PDPA), the Authority for the Protection of the Secrecy of Communications (APSC) and the General Secretary for the Protection of Consumers, for matters of common interest.
- Cooperates, in matters of its competence, with the corresponding National Regulation Authorities (NRA) of the rest of the EU member states or of third countries as well as with the European Community or with international institutions. Represents Greece in the National Regulatory Authorities Group.

1.2. Secondary Legislation

In the context of its competences, relative to the adaptation of the existent secondary Regulative Framework to the provisions of L.3431/2006, EETT completed the elaboration of the majority of Regulations, that needed to be issued, as well as of the Recommendations to the MTC, in order to achieve the harmonization of the Greek legislation with the new European Regulatory Framework. It is noted that, before the issuance of all the Decisions or Recommendations that follow, a National Public Consultation took place.

More specifically, EETT proceeded in 2006 to issue the following Regulatory Decisions:

1. Regulation on Consultations.
2. Regulation on General Authorisations.
3. Regulation on the Use and the Granting of Use of Radiofrequencies under a General Authorisation Regime.

4. Regulation on the Terms of Use of Individual Radiofrequencies or Zones of Radiofrequencies.
5. Regulation on Licenses for Antenna Mast Constructions.

The following EETT proposals to the MTC were also issued:

1. The NNP.
2. The determination of the Content of the Universal Service (US).
3. The Criteria for the Selection of the Universal Service Provider (USP).
4. The Apportionment of the Net Cost of the US.

Moreover, the Public Consultations concerning the following subjects were concluded:

1. The Regulation on the Management and Assignment of Numbering Resources of the NNP.
2. The Regulation on the Transfer of Radiofrequencies Rights of Use.
3. Issues that concern the Transfer of a part of a Radiofrequencies right of Use.

An analytical presentation of the Regulatory Decisions of EETT follows.

Regulation on Public Consultations

In February 2006, EETT issued the Regulation² on the Procedure of Public Consultation, which sets the general principles and the rules that govern the procedure of the Public Consultations that EETT conducts, according to L.343 I/2006. In the specific Regulation, the structure and the context of the texts of Public Consultations are also described.

The goal of the Public Consultation is to give the opportunity to the interested parties to express their views on the specific issues and proposed measures, so that EETT can shape a complete view on the Electronic Communications

markets while exercising its competencies.

The duration of each Public Consultation is, in principle, 30 days, with a possibility for EETT to set a shorter or longer time period. The possibility of extending the duration of the Consultation by a Decision of the President of EETT is also provided, after the submission by the interested parties of relative demands, within a deadline set by the Regulation.

EETT publishes on its web site the archives of each Public Consultation, the answers of the interested parties, with respect to confidentiality, as well as the related results – conclusions.

According to the Regulation, EETT may, by its Decision, cancel at any time the continuance of the Public Consultation, proceeding to a relative announcement and has the obligation to maintain the written and electronic files of the Consultations.

Regulation on General Authorisations

With the new Regulation on General Authorisations³ the procedure of licensing of the Electronic Communications networks and / or services providers in Greece is being harmonized with the existent European Framework⁴.

The General Authorisation regime covers every form of Electronic Communications activity that concerns the provision of Electronic Communications networks and / or services. According to the new Regulation, the Registration Declaration is submitted only by persons that provide public communication networks or services, as well as by persons that operate Private Mobile Radio (PMR) networks. However, the non-submission of a Declaration does not mean that the aforementioned persons are not subject to the General Authorisation Regime. On the contrary, they are obliged, as every enterprise that provides services to the public, to observe the Regulation on General Authorisations. It is also noted

² EETT Decision 375/10/14-02-2005, GG Issue 314/A/16-03-2007.

³ EETT Decision 390/3/2006 "Regulation on General Authorisations", GG Issue 748/B/2006.

⁴ More specifically, with the provisions of the Directive 2002/20/EC of the European Parliament and Council, of 7th March 2002, for the licensing of Electronic Communications networks and services (Directive on Licenses).

that if for the exercise of the Electronic Communications activities, the assignment of a right of use of numbers or frequencies is needed, the interested person has to acquire this right before the beginning of the said activity.

The basic change that is introduced with the new Regulation on General Authorisations, in relation to the previous framework, is the abolition of the Individual Licenses and their replacement by the General Authorisation Regime. As an exception, the Individual Licenses that concern the awarding of Radiofrequencies Spectrum are replaced by the General Authorisation framework and by the granting of Radiofrequencies Right of Use.

A very important difference, in relation to the previous framework, concerns the obligation to submit a Registration Declaration by persons that do not possess their own Electronic Communications infrastructure but provide Electronic Communications services under a different commercial brand and operational organization, based on the infrastructure of other persons.

An annual administrative fee⁵ is imposed to all persons who operate under a General Authorisation Regime and provide public communication networks or available to the public Electronic Communications services.

For the transition from the existing to the new Authorisation Framework, EETT proceeded:

1. To the adaptation of the existent Registration Declaration to the provisions of the new General Authorisations Regulation, correlating the Activity Codes of the old Regulation to the Activity Codes set by the new Regulation. The correlation of the services, as well as the new services for all persons who are registered in the Electronic Communications networks and / or service providers Registry, is published on EETT's web site .

2. To the adaptation of the existent Individual Licenses, with the exception of those that concern the awarding of Radiofrequencies Spectrum zones, to the provisions of the new General Authorisations Regulation, adding to the Registration Declaration of each company the Activity Codes that correspond to the activities that were exercised under the Individual License.

3. To the notification to the providers of the proposed adaptation of the existent Individual Licenses, that concern the awarding of Radiofrequencies Spectrum zones, to the provisions of the new Regulation on General Authorisations. Taking into account the observations and comments of the providers, EETT shall proceed to the said adaptation, adding to the Registration Declaration of each company the Activity Codes that correspond to the activities that were exercised under the Individual License. In parallel, EETT shall issue for each Radiofrequencies zone that has been awarded with an Individual License a corresponding Radiofrequencies Right of Use.

Regulation on the Use and Granting of Rights of Use of Radiofrequencies under a General Authorisation Regime for the provision of Electronic Communications Networks and / or Services.

In August 2006, EETT issued the Regulation⁶ on the Use and Granting of Rights of Use of Radiofrequencies under a General Authorisation Regime for the provision of Electronic Communications networks and / or services.

With the specific Regulation, the framework for the use of Radiofrequencies under a General Authorisation Regime is determined, as well as the procedure for the granting of personal Rights of Use of Individual Radiofrequencies or zones of Radiofrequencies for the provision of Electronic Communications networks or services.

⁵ The administrative fee is calculated as a percentage of the total net income from the provision of public communication networks or available to the public Electronic Communications services under a General Authorisation regime. Moreover, an administrative fee of 300 Euros is imposed on the submission of the initial Registration Application, while an administrative fee of 100 Euros is imposed on the submission of each modification of the initial application, which strictly relates to the registration of new services.

⁶ EETT Decision 390/1/2006, GG Issue 750/B/2006..

More specifically, with the said Regulation, the following changes were made:

- Abolition of the obligation to possess an Individual License in order for a provider to acquire a Radiofrequencies Right of Use.
- Homogeneous procedure of assignment of a Radiofrequencies Right of Use of independently of the provider.
- Longer duration of use of Radiofrequencies for the Rights of individual frequencies (10 years)
- Procedure of assignment of Rights of Use of Radiofrequencies in PMR networks by one common provider.
- Abolition of the special categories of professionals that may acquire a right of use of Radiofrequencies in PMR networks.
- Cancellation of the restriction of the frequencies that the holders of PMR networks may acquire.

Regulation on the Terms of Use of Individual Radiofrequencies or Zones of Radiofrequencies

In August 2006, EETT proceeded to the issuance of the Regulation⁷ on the Terms of Use of Individual Radiofrequencies or Zones of Radiofrequencies. In the specific Regulation the technical and administrative conditions in which the individual Radiofrequencies or zones of Radiofrequencies must be used for the provision of Electronic Communications networks and services are set for the first time, taking into account the national requirements, the international agreements, the decisions of the competent institutions of the World Administrative Radio-Communications Conference, the recommendations of the International Telecommunications Union – Radio Communications Department and the Directives of the E.U.

The application of this Regulation in combination with the Regulation on General Licenses and on the Use and Granting of Radiofrequencies Rights of Use aims at the creation of an explicit framework for the licensing and use of Radiofrequencies Spectrum.

Regulation on Licenses for Antenna Mast Constructions

After the introduction of L.343 I/2006, the need to reform the existent until then legal framework concerning the mobile telephony antenna constructions arose. In replacement of the older Regulation⁸ the new Regulation⁹ on Licenses for Antenna Mast Constructions was therefore issued by EETT.

This new Regulation contains all the details for the licensing of antenna constructions that are used for the provision of wireless Electronic Communications networks under a General Authorisation Regime, and specifically:

- The procedure on the granting of an Antenna Construction License.
- The conditions for the rejection of an Antenna Construction License application.
- The terms for the co-installation or for the common use of facilities and installations on the same property.
- The conditions for the identification of each antenna construction.
- The procedures on the change or revocation of the Licenses that have been granted.
- The enumeration of the cases in which it is judged necessary to interrupt the operation of each antenna construction and the description of the procedure followed by EETT.

The new element of the Regulation is the provision of an administrative fee for the examination and the issuance of each License.

⁷ EETT Decision 399/34/2006, GG Issue 1456/B/2006.

⁸ EETT Decision 236/79/23-I I-2001 "Regulation on Licenses of Antenna Mast Constructions", GG Issue 1649/B/2001, as amended by EETT Decision 355/18/2005 (GG Issue 1471/B/2005).

⁹ EETT Decision 406/22/2006, GG Issue 1666/B/14-I I-2006.



Focusing on Consumers

2. Focusing on Consumers

The following Chapter deals with the actions taken by EETT in view of protecting consumers' rights, improving quality of service, guaranteeing a wider variety of choices and reducing prices. More specifically, it presents the work carried out by the Consumer Service Sector (CSS), as regards requests and complaints management, as well as the actions implemented by EETT during 2006 for the provision of information-training of consumers. Also, emphasis is given to consumer benefits following EETT's actions for the provision of Universal Service (US), enhancement of competition and the promotion of Broadband Internet.

2.1. Consumer Service Sector

2006 was the fourth consecutive year of the operation of Consumer Service Sector (CSS). The primary task of this department is to inform consumers, solve issues arising from electronic

communications and postal services, and safeguard consumers' rights and interests in these sectors.

During 2006, the CSS received 5,672 written requests/complaints from consumers regarding the electronic communications and postal services, registering an increase of 16% and 189% in comparison to 2005 and 2004, respectively. The classification of written requests/complaints by subject, their annual evolution and their percentage change are displayed on Table I and Charts I and 2.

The majority of written requests/complaints for mobile and fixed telephony concerned issues such as disputed bills, Number Portability, Carrier Pre-Selection, tariff policy and obligations of telecommunications providers, as well as the quality and availability of services.

In the case of Radio Frequency Spectrum, the majority of issues pertained to the licensing of

Table I – Classification of Requests/Complaints from Consumers, 2003-2006

Category	2003 (%)	2004 (%)	2005 (%)	2006 (%)
TELECOMMUNICATIONS SERVICES	95	90	93	93
Spectrum (antennas and interferences)	35	54	36	17
Internet (availability of services and tariffs)	29	7	11	21
Mobile Telephony (availability of services, quality and tariffs)	15	10	5	6
Fixed Telephony (availability of services, quality and tariffs)	14	18	40	48
Domain Names [.gr]	2	1	1	1
POSTAL SERVICES	3	2	1	1
GENERAL INFORMATION	2	8	6	6

Chart 1

**Classification of Written Requests / Complaints
01-01-2006 to 31-12-2006 (%)**

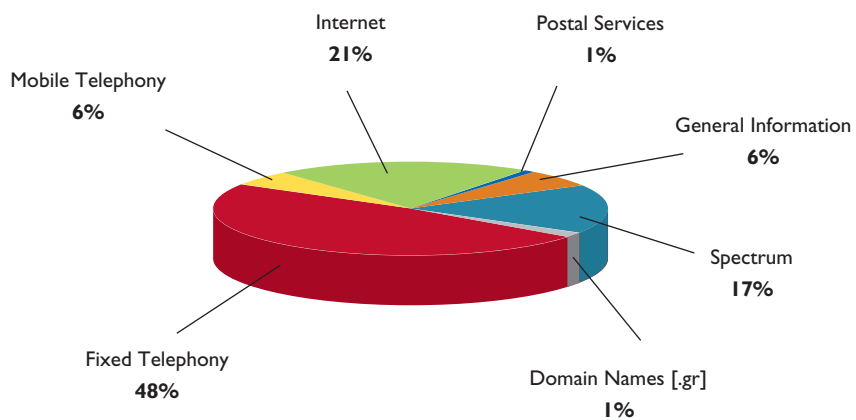
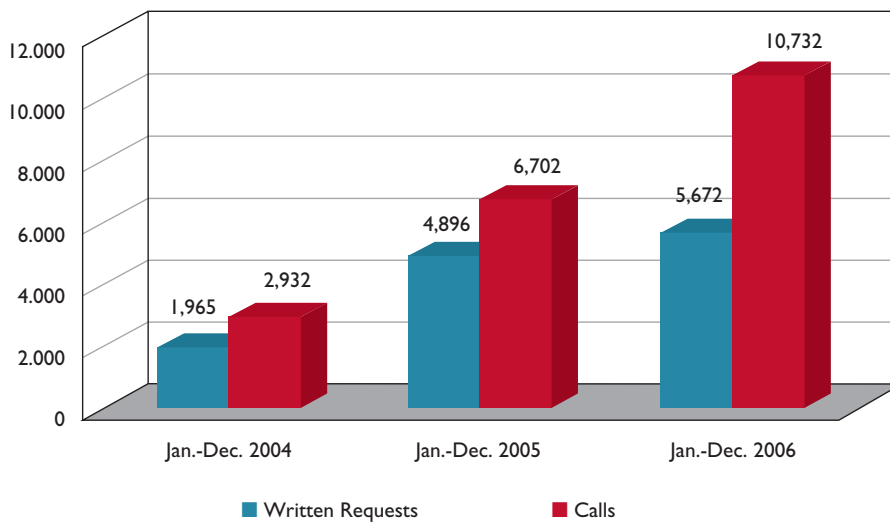


Chart 2

**Evolution of the Number of Calls and Written Complaints
2004-2006**



mobile telephony antennas and cases of interferences. As regards the Internet, most of the issues were related to the availability, the quality and the tariffs of Broadband Internet services, as well as to disputed bills.

As far as postal services are concerned, requests/complaints concerned the quality of services and the obligations of postal companies.

Moreover, the Consumers Communication Line of EETT (801 11000 80) received 10,732 phone requests/complaints from consumers during 2006, marking an increase of 60% and 397% compared to 2005 and 2004 respectively. The classification of telephone calls by subject is shown on Chart 3.

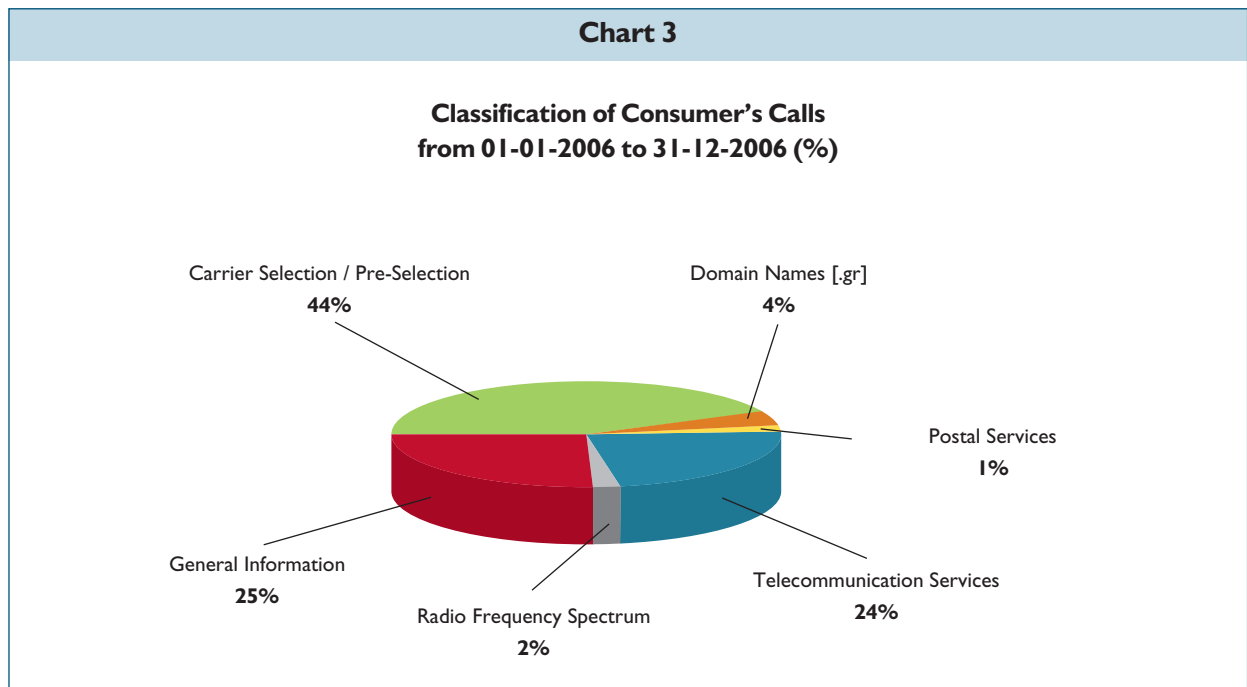
2.2. EETT's Actions and Benefits for the Consumer

2.2.1. Carrier Pre-Selection

Since the beginning of 2006, when EETT's Decision¹⁰ pertaining to Carrier Pre-Selection was implemented, a series of problems were solved in the fields of consumer information and protection.

The most important adjustments included in the new Regulation are the following:

- The submission of a request by phone (for the activation, change of plan, revocation, cancellation of revocation, or change of the Preselected Operator) is only accepted if the relevant conversation has been



¹⁰ EETT Decision 366/48/8-12-2005, GG Issue (22/B/17-01-2006) "Modification of the Regulation on Carrier Pre-Selection in the Greek Market".

recorded on tape, with the prior consent of the subscriber, and kept on a special file of the operator. In case there will be a dispute between the subscriber and the operator, then the operator is obliged to provide the relevant file to EETT.

- The provision of information by OTE to the subscriber for the activation of Pre-Selection. OTE has the right, to send to consumers, in any appropriate way, the standard text approved by EETT, informing him for the activation of Carrier Pre-Selection on a Preselected Operator.
- The provision of information about the activation of Carrier Pre-Selection from a specific telephone number of the Preselected Operator.
- The subscriber is entitled to appeal to EETT in cases where the Providers do not follow the Regulation (for activation, revocation and cancellation of revocation, change of plan or change of Preselected Provider).

EETT, following complaints by consumers for the activation/revocation, cancellation of revocation, of Carrier Pre-Selection without their consent, conducted a series of Hearings and imposed fines on Telecommunications operators for telecommunications legislation infringement (see sub-section 3.3.4.)

2.2.2. Local Loop Unbundling

Local Loop Unbundling (LLU) is fundamental for the further development of competition in the Electronic Communications Market, as well as for boosting broadband. Local Loop Unbundling enables Other Local Operators (OLOs) to use the existing wired access network for providing services to end users.

The LLU could have two different forms:

- a. Full Access of the Local Loop:** OLOs pay monthly rent to OTE. The Operator has the full use of the

copper subscriber network, according to his needs.

- b. Shared Access of the Local Loop:** Shared access by both OLOs and OTE on the same copper pair. More specifically, the Operator offers Data services through ADSL (broadband services) systems, while OTE still offers voice services.

During 2006, there was an increased interest of OLOs to invest in LLU and to provide services to end users in the form of Local Loops. As a result there was a significant increase to the number of unbundled local loops and a simultaneous increase of the subscribers who could have the opportunity to proceed to unbundled access of their Local Loop.

The benefits of consumers are extremely important. The available choices for consumers are significantly increased as they are able to benefit from a highly competitive market regarding the quality of the offered services (e.g fast internet, VoIP, video on demand, triple-play, etc.) as well as the available choices and tariffs.

2.2.3. Safeguarding Universal Service Provision

In the context of a basic level of telecommunications services to all citizens, the L.3431/2006 determines the obligation of Universal Service (US) provision from the Universal service Provider (USP). EETT decided¹¹ that OTE shall continue to be the Universal Service Provider (USP) for 2006, until the completion of the procedures for the appointment of a USP according to the new Law on Electronic Communications (L.3431/2006). Furthermore, the responsibility of EETT is the monitoring and supervision of the compliance with the obligations of US within the frame of its responsibilities.

¹¹ EETT's Decision 367/46/14-12-2005., GG Issue 22/B/17-01-2006.



Table 2 presents the information for 2003-2006

As arises from the aforementioned information, the number of outstanding applications for connection to the fixed public telephony network increased due to lack of network. This specific defect resulted in the increase of the usage of PCM-4 systems. At the same time OTE makes use of the old rural subscriptions radio-networks and the concentrator-lines. A consequence of all the above is the fact that a significant number of subscribers, more than 200,000 in the whole territory of Greece, are not in the position to make use of digital facilities and Internet access at speeds higher than 9.6 Kbps.

Additional information about the provision of US by the USP is shown in Table 3. The first column shows Quality of Service (QoS) indicators with the expected performance set by EETT¹², while the adjacent columns show the

performance declared by the USP for 2003-2006.

According to L.3431/2006, OTE, is obliged to provide the US, and also, among others, free selective barring for outgoing calls to OTE subscribers, upon their request.

The function of the outgoing call barring service refers to the avoidance of certain calls being made through the operator providing the barring service. It is noted that the outgoing call barring service provided by OTE also functions in cases where the user has activated Carrier Pre-Selection. Moreover, the outgoing call barring service does not refer to call completion from the particular telephone connection, that may be carried out with other means such as, for example, through Carrier Selection or directory enquiry services that provide call completion if requested.

Table 2 - Comparative Information for the Provision of US, 2003-2006

	31-12-2003	31-12-2004	31-12-2005	31-12-2006
Outstanding applications for connection to the fixed public telephony network due to lack of network or need for upgrading.	1,541	2,133	1,817	4,468
Number of subscribers connected to analog centres and therefore could not have all network facilities.	18,093	617	0	0
Number of subscribers who cannot be availed of data transfer services at a speed over 9.6 Kbps. The majority of those subscribers were connected to PCM-4 systems, whose replacement was not reduced by the USP.	75,945	153,641	130,381	132,816
Number of public payphones installed by the USP.	64,619	64,105	64,298	59,827

¹² EETT Decision 253/83/14-06-2002, GG Issue (874/B/12-07-2002).

Table 3- Performance of the USP, 2003-2006

Indicator	2003	2004	2005	2006
Time for the provision of initial connection 1 week for 95% of applications	Not available	Not available	Not available	Not available
Frequency of failures per 100 connections p/a 13,5%	13.6%	13.8%	12.8%	13%
Call failure percentage 2%	2.8%	3.2%	2.3%	2.6%
Percentage of failures repaired by the following working day 85%	82.1%	80.8%	82.3%	78.6%
Response time for operator services 20 secs	20	Not available	15	15
Response time for directory services 15 secs	20	Not available	12	15
Complaints about erroneous bills 0.2%	Not available	Not available	0.044%	0.087%

However, up to this day, OTE is providing selective outgoing call barring with a monthly charge. The service is activated/disactivated with the use of a 4-digit code and refers to various call categories (international calls, long-distance calls, calls to mobile phones, calls to premium rate numbers, etc.).

In August 2006, EETT called OTE to a hearing for injunction, in order to evaluate whether the company had complied with its obligation to provide selective outgoing call barring free of charge. In the framework of the procedure in question, EETT issued an Interim Order¹³, according to which OTE was obliged not to charge the outgoing call barring service. OTE filed an appeal to the Administrative Court that decided to suspend the execution of the Interim Order by EETT, until the issue of a final Decision.

Meanwhile, in the framework of its relevant obligations as the Provider of the US, with which EETT has requested OTE to comply, the latter announced the

provision of an outgoing call barring service free of charge, with the following specifications:

- The activation and provision of the service shall be free of charge to the subscriber.
- It shall cover the same call categories that are covered by the current barring service.
- The service is provided after the submission of an application by the customer at an OTE's store. The implementation shall be carried out within four (4) working days maximum.
- For cancelling or changing a category a small sum charge shall apply.
- The new call barring service shall also be functional in case a subscriber has activated the Carrier Pre-Selection function at the same time, as is the case with the current call barring service.

The service will be launched at the beginning of 2007.

Furthermore, in May 2006, OTE, in compliance with its obligations as the USP, completed the printing and free distribution of the Universal Telephone

¹³ Interim Order 31764/F.800/31-08-2006.

Directories. The above Directories include 15 volumes and cover the following regions: Achaia, Zakynthos, Elia, Kefallonia, Western Greece, Epirus, Corfu, Lefkas, Thessalia, Peloponnesus, Eastern and Central Greece, Evia, Eastern Macedonia, Thrace, Crete, Dodecannese, Cyclades, Islands of Northern Aegean, Western and Central Macedonia and Athens.

It has to be reminded that since June 2005 OTE, in compliance with its obligations as the USP, operates the Universal Telephone Directory Information Service through the short call code “11888” providing information for fixed and mobile telephone numbers.

Both the printed Universal Telephone Directories and the Universal Telephone Directory Information Service, include the telephone numbers of all fixed and mobile telephony subscribers, with the exception of the numbers of those subscribers who have expressed their opposition to be included there. The subscribers’ data of the Universal Telephone Directory Information Service is updated on a monthly basis, while the update of the printed Universal Telephone Directories is held on an annual basis.

Every volume of the printed Universal Telephone Directories is consisted of two parts. The fixed

numbers are included in the first part while the mobile numbers in the second part.

The publication of the next edition of the Universal Cellphone Directories has been scheduled to start at the beginning of the following year. Every subscribers’ entry in this edition is expected to include both the fixed and mobile subscriber’s telephone number.

2.2.4. Reductions in Termination Tariffs for Mobile Telephony Networks

EETT, in the framework of its regulatory competencies on the definition and analysis of Electronic Communications markets, and aiming at the further protection of the consumer, issued a Decision¹⁴ in August 2006 according to which the mobile operators telephony companies COSMOTE, VODAFONE, TIM/Q-Telecom, are obliged to make further reductions in mobile termination rates, so that in June 2007 the relevant rates will reflect call termination costs in every network.

Table 4 presents the reductions of the termination tariffs for mobile telephony companies from January 2006 to January 2007 as well as the target fees for June 2007. It is noted that the call termination fees up to December 2006 include a minimum charge of 30 seconds, which is cancelled in January 2007.

Table 4 - Reductions in Call Termination Tariffs for Mobile Telephony Networks

Call Termination Tariffs (Eurocents/minute)				
	Vodafone	Cosmote	TIM	Q TELECOM
January 2006	14.5 min charge of 30 sec.	14.5 min charge of 30 sec.	15.5 min charge of 30 sec.	19.5 min charge of 30 sec.
June 2006	12 min charge of 30 sec.	12 min charge of 30 sec.	12.5 min charge of 30 sec.	17 min charge of 30 sec.
January 2007	11.74	11.74	12.59	
June 2007	10.67	10.71	11.71	

¹⁴ EETT Decision 410/37/15-11-2006.

As a result of EETT's actions, the average reduction in call termination tariffs considering the relevant market shares, from January 2006 to June 2007 amounts to approximately 30%. Moreover, considering the reduction of the retention fee as of 01-12-2006 for calls made from fixed OTE numbers to mobile numbers, as well as the removal of the minimum charging time as of 01-01-2007 (30 seconds) in call termination tariffs, the average reduction of the retail charge for calls made from fixed to mobile numbers for the period between 01-01-2006 and 01-01-2007, is estimated to be around 27%.

The reduction of the call termination tariffs on mobile telephony networks is immediately followed by a significant reduction of retail call rates to mobile numbers from fixed and mobile numbers of a different network, maximizing consumer's benefit.

2.2.5. Protection Measures for Consumers from Dialers

During 2006, the number of unintentional calls through dialers, grew dramatically in Greece. For the protection of consumers, EETT made great efforts to face this problem.

The fraud through dialers takes place when the web site does not inform a user clearly about the fact that his/her actions will lead to the installation of software in his computer or that his/ her Internet connection will change, not only for accessing special content (Games, SMS logos, love content), but on a more frequent or permanent basis. Such dialers may then make calls to a premium rate number, at the user's cost, 24 hours a day, even every few minutes, provided that the computer is on.

EETT received a lot of complaints from consumers charged for calls to specific value added numbers, which were made unknowingly and without their consent. To protect consumers, EETT called the companies that

were assigned these numbers (initially or through portability) to a hearing while the instant measures procedure was initiated. At the same time, to prevent any further damage to consumers, EETT issued a Provisional Order¹⁵ in August 2006, ordering the above companies to cease the operation of the numbers in question, until a Decision is reached with regard to the instant measures procedure.

Moreover, EETT has edited and posted on its web site an information bulletin¹⁶ which provides information and guidance on how to identify dialers and how to protect one's computer from them. EETT has also invited all licensed Internet Service Providers (ISPs) in Greece and OTE to take similar information actions.

In the context of the new Regulation on General Authorizations, which was published in June 2006, EETT laid down specific rules on issues pertaining to informing users about the value added services they intend to use, including those provided through the Internet by legal dialer use.

At the same time, EETT has been processing a Code of Ethics for Multimedia Information Services (MIS) (including services provided through premium rate numbers 901XXXXXXXX), which will lay down more specific terms and conditions with regard to the provision of information to users accessing such services, including terms and conditions with regard to such services provided through the Internet. The Public Consultation on the Code of Ethics for Multimedia Information Services was completed on June 5th, 2006, and is expected to be implemented during 2007.

2.2.6. International Conference "The Prospects of Broadband in the Mediterranean"

With a view to promoting Broadband Internet and

¹⁵ Interim Order 29124/F800/07-08-2006.

¹⁶ www.eett.gr/opencms/sites/EETT/CostumerInformation/Telecommunication_Informations.html, 'Unintentional Calls through dialers while Surfing on the Internet.

making its applications known, EETT successfully organized in May 2006, in Athens, a three-day International Conference under the topic “The Prospects of Broadband in the Mediterranean: A Means to International Cooperation for the Benefit of the Market and the Consumer”.

The discussions of the Conference highlighted the significance of Broadband for the development of the Greek economy, the potential attraction of new investments and the participation of citizens in the Society of Knowledge. Moreover, the Conference offered the possibility to highlight the dominant role that Greece can play in the wider Mediterranean region.

The Prime Minister of the Hellenic Republic, Mr. Kostas Karamanlis addressed a message to the participants, while the Conference was inaugurated by the Minister of Transport and Communications, Mr. Michalis Liapis. Also, an opening message was delivered by Ms Viviane Reding, the European Commissioner responsible for Information Society and Media.

The first day of the Conference was dedicated to the “International Cooperation for the Promotion of Broadband”. Among the participants were representatives from Regulatory Authorities in the field of Electronic Communications from the wider Mediterranean region, CEOs and investors of the relevant market, as well as representatives of the academic community.

The second day of the Conference focused on “Broadband Technologies and Markets”. A constructive dialogue was carried out, as regards the contribution of the market in the promotion of Broadband.

The topic of the third day was entitled “Broadband and Civil Society”. During this session, representatives of Consumers Associations and Non-Governmental

Organizations (NGOs) spoke about the importance of Broadband as an everyday tool for citizens, as an opportunity for participation in the Society of Knowledge and as a means of development for NGOs. Finally, special emphasis was laid on EETT’s contribution to the promotion of Broadband in Greece and to the safeguard of Internet users’ rights.

The speeches and the presentations of the speakers are available at EETT’s web site¹⁷.

2.2.7. “The Evolution of Courier Services and the Role of EETT” Workshop

In February 2006, EETT organised a Workshop under the subject “The evolution of Courier Services and the role of EETT”. The first part of the Workshop was entitled “The Courier Services Market: Current Situation” while the second part focused on the “Trends and Prospects of the Courier Services Market”.

The Communications Secretary General of the Ministry of Transport and Communications, Mr Konstantinos Stavropoulos attended the event together with executives of courier – postal market, representatives of chambers, IRS, as well as consumers.

Through the conclusions of the Workshop was stressed that EETT shall continue the shaping of a transparent and impartial regulating environment as well as the enactment of operating principles that will encourage the development of Postal Market, investments in the sector, competition and innovation. It shall be EETT’s main concern to develop the Market by concurrently improving the quality of service users enjoy.

The speeches/ presentations¹⁸ are available at EETT’s web site.

¹⁷ www.eett.gr, Press Releases/Announcements/Events.

¹⁸ www.eett.gr, Press Releases/Announcements/Press Releases.

2.2.8. Campaign for Mobile Telephony Antennas

EETT, at November 2006, organized a workshop on “Mobile Telephony Antennas: a Responsible Dialogue for the Information and the Protection of the Citizens”, inaugurating a multidimensional and systematic action plan, based on the 3 axes: “Information-Control-Transparency”.

The Agenda of the Workshop included the following entities:

- Wireless Communications: Electromagnetic Field and Scientific Data.
- The place of the citizen in the new environment: Ways for informing and protecting.
- Organisation bodies views for the existing regulatory environment – proposals for the future.

The target of the workshop was to inform on the aspects of mobile telephony and to contribute to the scientific analysis of the issue of “mobile telephony antennas and electromagnetic radiation”. Furthermore, with this occasion, the opportunity was given to the interested parties to submit their views and therefore a fruitful and substantial public dialogue has been opened for the benefit of the citizens.

During the workshop, EETT announced the beginning of a campaign during 2007, having the following targets: a) to protect the citizens, b) to conduct reliable inspections and to monitor continuously the electromagnetic radiation, c) to strengthen citizen’s trust to the institutions. The expected results of this campaign were towards the minimization of the effects from the electromagnetic exposure of the citizens, the removal of suspicions for the operation of the already installed antennas systems and the preventive actions regarding the new type antennas as well as wireless applications.

Provision of objective and thorough information to the public is of great importance for such issues as mobile telephony. The important role of EETT has been stressed on matters like informing the citizens and applying control and monitoring procedures, aiming on the protection and on the minimisation of radiation effects as well as on the development of wireless communications.

The speeches / presentations and the minutes of the workshop¹⁹ are available at EETT’s web site.

Publication on “Electromagnetic Radiation and Mobile Telephony Antennas: Scientific Data”

In the context of the Workshop but also in a wider informative campaign that began in 2006, EETT proceeded in the publication of an informative leaflet where mobile telephony antennas and electromagnetic radiation are scientifically approached. It concerns a thorough study, based on up to today scientific data. In particular, it analyzes basic concepts, as the electromagnetic radiation, the radiowaves, radiofrequency power, while at the same time it highlights studies and reports based on health effects of the low frequency electromagnetic field exposure, as those are created by the use of mobile telephones and mobile telephony antennas.

Moreover, this publication presents guidelines and policies on the electromagnetic field exposure emphasizing on the limits that have been established for the protection and minimalization of radiation to the public. In addition, information is provided on the factors affecting exposure to radiation from mobile phones, the compliance of terminal equipment to national and international directives as well as the rational use of mobile telephones.

The publication²⁰ is available at EETT’s web site.

¹⁹ www.eett.gr/News/Announcements/Events.

²⁰ [www.eett.gr/Press Releases-Announcements/Press Releases](http://www.eett.gr/Press_Releases-Announcements/Press_Releases).



FOCUSING ON CONSUMERS

2



Electronic Communications Sector

3. Electronic Communications Sector

This Chapter presents the main actions of EETT in the Electronic Communications, which are focused on three main directions:

- Development of Broadband in Greece: EETT's actions aimed at the effective resolution of problems regarding Unbundled Access to the Local Loop (LLU), Collocation Services and Leased Lines, as well as at the further development of Wireless Access Networks market.
- Market analysis on the basis of the European Regulatory Framework: EETT completed the procedure of notifications to European Commission related to the definition of individual markets, analysis of competition and the proposed regulatory obligations for the whole of individual markets.
- Promotion and safeguarding of fair competition in networks and services: EETT took coordinated actions to solve problems in the fields of Rights of Way, and cost audit of OTE's wholesale-retail services while it performed a number of ex-officio audits in the offices of providers of Electronic Communications and continued its actions for further promotion of issues concerning Carrier Pre-Selection, Number Portability and Electronic Signature.

3.1. Actions for Broadband Development

3.1.1. Local Loop Unbundling (LLU)

EETT, having as a main goal, the promotion of competition in the market of electronic communications and the boosting of penetration of broadband services, proceeded to the following actions for further LLU exploitation, without infringements:

- EETT completed the market analysis of Local Loop/Subloop Unbundling (Full/Shared) Market II. In accordance with its Decision²¹ EETT imposed the following obligations on OTE as

telecommunications organization with Significant Market Power (SMP):

- I. Access Obligation and Use of Special Network Facilities.
 - II. Non-discrimination Obligation.
 - III. Transparency Obligation.
 - IV. Price Control
 - V. Cost Accounting Obligation.
- OTE's cost audit for the year 2005 (see sub section 3.3.6) determined significant reductions on the LLU charges and Collocation Facilities comparing with the corresponding ones of 2004. More specifically, the monthly rental of shared LLU was reduced by 49%. The charges reduction of the Collocation Facilities varied from 2 to 70%. Simultaneously, the bottom-up cost models of OTE were improved significantly in order to present the cost of the relevant activities in a more detailed and rational way.
 - EETT started the cost audit of 2006 for the determination of LLU services and Collocation Facilities which is expected to be completed at the beginning of 2007 (see subsection 3.3.6).
 - Continued to perform the cost monitoring and supervision of the physical collocation from OTE.

The above actions of EETT, had as a result the significant increase of the number of local loops (full and shared). At the end of the year, this number increased from some thousands at the beginning of 2006 to 110.000 approximately. This trend is expected to continue at a greater pace during next year.

3.1.2. Collocation

A necessary prerequisite for the implementation of the two forms of LLU (full and shared) is the collocation of Other Locals Operators (OLOs) to the OTE Local Exchanges where the access network terminates, based on the fact that OTE is obliged to provide LLU.

²¹ EETT Decision 388/12/30-05-2006, GG Issue 932/B/2006.

This can be achieved through various forms of collocation, such as:

- Physical Collocation.
- Distant Collocation.
- Virtual Collocation.
- Co-mingling.

Co-mingling was included for the first time in the recent Regulatory Obligations of OTE imposed by EETT²² (July 2006) as part of the Analysis of Market I I.

EETT, taking into consideration the problems experienced by OLOs in the implementation of collocations since 2001 when the implementation of LLU started in Greece, as well as the increased interest of OLOs to invest in LLU, appointed a task force to perform the everyday monitoring of the implementation of LLU collocation and the provision of local loops. During 2006, this task force was in constant cooperation with employees of OTE and OLOs that are responsible for the implementation of collocation plans and the immediate and direct resolution of all the coming up issues.

As a result of EETT's actions, the rate of provision of collocation facilities by OTE has been increased considerably. The number of OTE's Local Exchanges where physical collocation is provided was increased to 38 on December 2006. It should be noted that physical collocation offered in the time period 2001-2005 was just 1 Local Exchange. Additionally during 2006, OTE provided more than 50 maintenances of internal tie-cables and dedicated manholes. As a result there was a significant increase of the consumers, who benefit from LLU.

Based on the schedule for the construction of physical collocation sites, the number of Local Exchanges with physical collocation facilities is expected to rise in 2007 to 150 with an isomeric

assignment of the local Exchanges in Attica region and rest of the country. In practice, the number of Local Exchanges where collocations facilities are offered is expected to be even higher if the number of other forms of collocations operating in parallel to the physical collocation are also taken into account.

3.1.3. Leased Lines

With regard to Leased Lines and their important role in the promotion of broadband services, EETT took the following actions during 2006:

- Completed the analysis of the two markets related to the wholesale leased lines provision (Markets I3 & I4). Specifically EETT reached the conclusion that there are the following three relevant national markets:
 - Wholesale Terminating Segments of Leased Lines of bandwidth up to and including 2 Mbps.
 - Wholesale Terminating Segments of Leased Lines of bandwidth above 2 Mbps.
 - Wholesale Trunk Segments of Leased Lines.

EETT reached the conclusion and issued a Decision²³ that the above markets are lacking of effective competition and designated OTE as having SMP (Significant Market Power). At the same time EETT imposed to OTE a series of regulatory obligations, the most important of which are the following:

- Specific obligations relating to the provision of access to, and use of, specific network facilities, which will expand the range of options available to providers of Electronic Communications.
- Non-discrimination obligation and a number of transparency obligations, including the obligation to publish a Reference Offer for the Wholesale Provision of Terminating and Trunk Segments of Leased Lines and Part Circuits, as well as the use of Key Performance Indicators

²² EETT Decision 388/12/30-05-2006, GG Issue 932/B/18-07-2006.

²³ EETT Decision 401/14/06-09-2006, GG Issue 1419/B/26-09-2006.

- (KPIs), in order to ensure non-discrimination.
- Service Level Agreements (SLAs) on all wholesale Leased Lines products and all the related procedures, as the provision of relevant services and restoration of failures.
 - Price and cost control obligation on the aforementioned markets in the form of cost orientation. The calculation of cost-oriented prices shall be based on the Long Run Average Incremental Cost (LRAIC) model and on the Current Cost Accounting (LRAIC-CCA).
- EETT has conducted the analysis of the markets for Retail Leased Lines Market (Market 7). EETT has reached the conclusion²⁴ that the relevant market is lacking effective competition and that OTE holds SMP in this market. Consequently, EETT has imposed to OTE a series of regulatory obligations. The most important of them is price and cost control obligation based on the Fully Distributed Cost model and on the Current Cost Accounting (FDC-CCA).
 - EETT conducted the cost audit of OTE for the year 2005. As a result of the audit the charges for the Wholesale Leased Lines of high capacities (higher than or equal to 34 Mps) have been reduced significantly both for the one-off and the monthly rental (access and per km).

3.1.4. Wireless Access Networks (Wi-Fi)

EETT, aiming at the development of broadband networks and estimating that Wireless Access Networks promote the boost of all citizens participation to the Information Society, exploited the possibilities given by L.3431/2006 and issued regulatory actions upon restriction removal related to the licensing procedure of Wi-Fi networks in 2.4GHz and 5 GHz zone. In particular:

- Licensing procedure for the W-LAN services provision has been simplified, since June 2006, due

to the fact that the Individual License is no longer required and instead a simple notification declaration is submitted at EETT for the provision of Electronic Communications services.

- The development of W-LAN, intended for individual use, does not require the submission of notification declaration.
- Following EETT proposal, a Ministerial Decision (MD) has been issued in the frequency zones 2400-2483.5 MHz, 5150-5350 MHz and 5470-5725 MHz, allowing the development of Wireless Access Systems, including Radio LANs (WAS/RLAN), regardless topology.
- The frequency zones 2400-2483.5 MHz, 5150-5350 and 5470-5725 MHz have been defined as free spectrum use zones²⁵, without radio frequency assignment or usage fees²⁶, according to EETT Decisions.

The result of EETT's regulatory actions is visible on the development of the Greek market and the subsequent benefits for the ordinary consumer regarding the diversity, quality and pricing of different services.

3.1.5. Wi-MAX Licenses

EETT, aiming at the strengthening of the Broadband initiatives, the development of alternative infrastructure and the provision of innovative Electronic Communications Services, started the process of granting Fixed Wireless Access Rights of Use in the frequency zone of 3.5GHz, where the use of Wi-MAX (Worldwide Interoperability for Microwave Access) technology has been foreseen for the development of Wireless Networks.

EETT, since December 2005, had invited all interested parties to ask for a provisional License for testing the Wi-MAX technology, with a validity of 3 months (until 30 April 2006).

²⁴ EETT Decision 406/33/11-10-2006, GG Issue 1660/B/13-11-2006.

²⁵ EETT Decision 399/34/16-08-2006.

²⁶ EETT Decision 390/11/13-06-2006.

In parallel, EETT investigated whether it would be possible to proceed with regional Rights of Use or with one National Right of Use since the available spectrum bandwidth was 2x14 MHz and therefore the number of available Radio Frequency Right of Use could not be increased.

Table 5 shows the schedule of Radio Frequency Rights of Use granting process.

EETT, after considering the results of the Public Consultation (16th February-16th March 2006) and aiming at an optimized Spectrum exploitation as well as at the infrastructure development for the promotion of Broadband, granted finally one National Right of Use through auction procedure.

Afterwards, EETT conducted a Public Consultation of an Information Bulletin (24th May-9th June 2006) concerning the proposed procedure for Spectrum licensing, aiming

in parallel at informing the interested parties for the whole procedure. Results of the Public Consultation have been published at EETT's web site. In addition, the Call for Tender has been published, where terms and conditions of the auction procedure were described and the interested parties were aware of the criteria upon which the final conduct would have taken place for a fixed wireless access license (Wi-Max) at 3.5GHz zone.

EETT has conducted a multi round auction with an incremental bid. The participants should dispose the minimum private capital of the amount of 10,000,000€ and submitted 600,000€ as a guarantee for their participation. The starting bid has been defined at 1,650,000€ and the seven following companies participated: INTERNATIONAL AIRPORT OF GREECE AE "ELEFThERIOS VENIZELOS", CLEARWIRE EUROPE S.á.R.L. COSMOTELCO TELECOMMUNICATIONS SERVICES, FORTHNET, HELLAS ON LINE, TELLAS, VODAFONE.

Table 5 - Schedule of Granting Radio Frequency Rights of Use

Public Consultation for the granting of Individual Licenses or Fixed Wireless Access Radio Frequency Rights of Use	16 February - 16 March
Public Consultation Results	11 April
Information Bulletin Publication	24 May
Deadline for the submission of comments regarding the Information Bulletin	9 June
Publication of brief results	15 June
Publication of Call for Tender	26 June
Submission of applications	21 July
Announcement of selected participants	24 July
Radio Frequency Rights of Use granting process	27 July
Radio Frequency Rights of Use granting	27 July

After the completion of 18 rounds, the National Right of Use has been obtained by an alternative operator, COSMOTELCO TELECOMMUNICATIONS SERVICES, at the auction price of 20,475,000 euros. The achievement of a high bid showed the high interest in the acquisition of the National Right of Use.

The above mentioned Right of Use has a duration of 10 years. The undertaking is obliged to develop a Fixed Wireless Access Network and to provide Electronic Communications services, including nomadic services, i.e. services provided to subscribers on the move in the Greek territory but received at fixed points.

The undertaking is obliged to develop the required infrastructure for the provision of broadband services in seven geographical zones of the country, within a 4-year timeframe, and to achieve population coverage of at least 20%, in every zone. Furthermore, the provider has the obligation to provide broadband access to end users at the speed of 384/128 Kbps.

3.1.6. Regulatory Issues on Voice over Internet Protocol (VoIP)

VoIP-based services have made their appearance in Greece, since 2004, but they are still in a very early stage of penetration in the market. Technology evolution and broadband development led to the improvement of quality of services and to the development of new applications, which are expected to increase the interest of users and providers. Network integration is achieved by using VoIP (ie Internet access and fixed telephony over a unique network) and this resulted to low billings at the end user.

EETT has conducted a Public Consultation, from 19-05-2007 until 15-06-2007, with issues related to VoIP technology, aiming at the creation of a regulatory framework in which new services should be developed

efficiently and without limitations, considering, in any case, the user interest and protection. The main issues were related to VoIP provision in the Greek market and in particular:

- Service architecture and Interconnection with other networks.
- Numbering.
- Specifications of the provided service (nomadcity, etc.).
- Service quality and reliability.
- Access to emergency numbers.
- Universal Service Obligations.
- Consumer information.

In the framework of the consultation, EETT pointed out certain issues that it considers they require prompt regulation, as numbering and calls to emergency service, with the aim to confront at the proper time issues of national resources and safeguard consumers' interests.

EETT will proceed with the regulation of the specific issues within 2007, taking under consideration consultation results.

3.2. Market Analysis on the Basis of the European Regulatory Framework

In accordance to the L.3431/2006, EETT was required to conduct an analysis of the level of competition in relevant markets of Electronic Communications, following the procedure of market analysis which is described in the aforementioned law and the related Framework Directive. The Law foresees that in cases the relevant market is not effectively competitive, EETT must identify the undertaking or undertakings with SMP on that market and impose on such undertakings the regulatory obligations that it considers appropriate.

EETT during 2006, has completed the market analysis for almost the whole of electronic communications market. EETT communicated to the European Commission and to the other National Regulatory Authorities (NRAs) the Measure Plans. Following completion of all the above processes EETT taking into account the responses of European Commission consultation, adopted the relevant measures. Both the Notification documents and the Relevant Decisions are available at EETT's²⁷ web site. More specifically:

- Markets 1-2 and 3&5 (Market of Retail Access to the Public Telephone Network at a Fixed Location and Markets of Publicly Available Telephone Services provided at a Fixed Location): According to EETT's Decisions²⁸, OTE has been designated as having SMP in the relevant markets and a number of remedies were imposed. The most important are the provision of access, the provision of wholesale line rental (WLR) offer, non discrimination obligation, and retail price controls in the form of a Price Cap.
- Market 7 (Retail Leased Lines Market): According to EETT's Decision²⁹, OTE has been designated as having SMP in the relevant market and a number of remedies were imposed. The most important are the provision of access, non discrimination obligation, and price and cost control obligation based in the form of cost orientation (see sub section 3.1.3).
- Markets 8-9-10 (Wholesale Interconnection Markets): According to EETT's Decision³⁰, OTE has been designated as having SMP in the relevant wholesale markets while the other undertakings who provide voice telephony have been designated as having SMP in the call termination on individual Fixed Location public telephone network market (Market 9). According to EETT's Decision a number of remedies have been imposed. The most important are the provision of access, non discrimination obligation, and wholesale provision of price and cost control obligation.
- Market 11 (Wholesale LLU provision): According to EETT's Decision³¹, OTE has been designated as having SMP in the relevant market and has been imposed a series of obligations (see sub section 3.1.1.).
- Market 12 (Wholesale Broadband Access Market): According to EETT's Decision³², OTE has been designated as having SMP in the relevant market and a number of remedies have been imposed. The most important are the provision of access, non discrimination obligation, and price and cost control obligation based in the form of retail minus.
- Markets 13 & 14 (Wholesale Leased Lines Markets): According to EETT's Decision³³, OTE has been designated as having SMP in the relevant wholesale markets and a number of remedies have been imposed (see subsection 3.1.3).
- Market 15 (Access and Call Origination on public mobile telephony networks): According to EETT's Decision³⁴ no operator was designated to have SMP in this specific market, thus no remedies were imposed.
- Market 16 (Call Termination to Mobile Telephony Networks): EETT, after conducting public consultation at a national and European Commission level, adopted the related notification based on which the mobile operators are appointed as telecommunications organizations with SMP in their network. On the aforementioned mobile operators a number of remedies have been imposed³⁵. The most important are the provision of access, non discrimination obligation, and price and cost control obligation.
- Moreover, for the following markets (sub-markets) public consultations are conducted in parallel at a national and European Commission level and are expected to be completed at the beginning of 2007.

²⁷ www.eett.gr/opencms/sites/EETT/Electronic_Communications/Telecoms/Market_Analysis/news.html.

²⁸ EETT Decision 4111/017/22-11-2006, GG Issue 1873/B/28-12-2006.

²⁹ EETT Decision 406/33/11-10-2006, GG Issue 1660/B/13-11-2006.

³⁰ EETT Decision 406/34/11-10-2006, GG Issue 1669/B/14-11-2006.

³¹ EETT Decision 388/012/30-05-2006, GG Issue 932/B/18-17-2006.

³² EETT Decision 389/051/08-06-2006, GG Issue 891/B/12-07-2006.

³³ EETT Decision 401/14/06-09-2006, GG Issue 1419/B/26-09-2006.

³⁴ EETT Decision 410/35/15-11-2006, GG Issue 1790/B/12-12-2006.

- Market PRA-ISDN (market of Access to the Public Telephone Network through PRA-ISDN Lines- submarket of 2): According to EETT's notification, OTE has been designated as having SMP in the relevant market and a number of remedies have been imposed. The most important of them are the provision of access and the non discrimination obligation.
- Markets 4 & 6 (Markets of Publicly Available International Telephone Services provided at a Fixed Location): According to EETT's notification no operator was designated to have SMP in this market.
- Market 17 (Wholesale Market for International Roaming on Public Mobile Networks): according to EETT's notification no operator was designated to have SMP in this market.
- Market 18 (Market of Wholesale Broadcasting Transmissions and Transmission Networks to End Users: According to the current Greek Law on Electronic communications, the competent body to conduct the market analysis of this relevant market has not been designated yet. However, EETT has prepared a draft of the market analysis of this market and is expecting the relevant legal amendment in order to proceed with the conduction of the national consultation and the notification to the European Commission.

EETT, who in accordance with the new L.3431/2006 on "Electronic Communications" is empowered to proceed to the market analysis of the Electronic Communications, completed with great success till the end of 2006 the notifications of the draft measures of the identification-competition analysis- and the proposed regulatory obligations to the European Commission.

Furthermore, EETT proceeded to all the necessary

actions for the implementation of its Decisions and especially the regulatory obligations which have been imposed to operators with SMP. More specifically, with regards to the above plan EETT held a public consultation on issues pertaining to "the Reference Offer of Local Loop Unbundling and the relative facilities of OTE" and the "the Reference Offer of Wholesale Bitstream Access".

3.3. Promotion and Safeguarding of Fair Competition in Networks and Services

3.3.1. On Site Inspections in Telecommunication Companies

EETT performed a number of ex-officio audits/onsite inspections in the offices of telecommunication companies during the second semester of 2006. The said audits were performed in application of Article 14³⁶ of Law on Electronic Communications (L.3431/2006).

More specifically, EETT personnel is entitled to perform investigations in the offices and other facilities of Electronic Communication companies, and audit all kinds of books, data and documentation thereof, and take sworn or non-sworn state statements, at their discretion.

Within the framework of the above audits/onsite inspections, EETT audit crews received data and documentation and collected information relevant to the scope of the audit from the personnel of the audited companies. The objective of the specific onsite inspections was to verify, on one hand, compliance of the audited companies with their obligations as electronic communications network and service providers, and on the other hand, to ensure the rights of subscribers - consumers so as to protect them against any unlawful and abusive commercial policies.

³⁵ EETT Decision 392/017/08-06-2006, GG Issue 1016/BI/28-07-2006.

³⁶ According to Article 14 L.3431/2006 EETT personnel, in order to identify Violations of the Law and the rules on competition in the telecommunications sector, shall have the powers and rights assigned to the Competition Commission based on L.703/1977.

The data and information collected are being processed by the responsible Departments of EETT. In case of violations ascertainment the process of Hearing will be followed in order for EETT to impose all the administrative sanctions deriving from the Law.

3.3.2. Electronic Communications Rights of Way

EETT, according to Article 29 of L.3431/2006, on Electronic Communications, is obliged to prepare a special proposal to the Minister of Transport and Communications on the procedures to be applied for the rights of way granting, as well as for the calculation of the relevant fees for the Electronic Communications network.

In addition to the above mentioned Law, a Joint Ministerial Decision (JMD) should be issued by the Minister of Transport and Communications and the co-responsible Ministers, where granting procedures, fees submission, beneficiary for fee collection and any other relevant detail will be defined.

The definition of the provisions for the rights of way granting is one of the most critical issues for the infrastructure development leading to broadband deployment in Greece. The particularities on the installation facilities on, over or under Public, Municipality or Common Use areas are several. Legislation on construction works in Public or Common Use areas and streets, municipal rights and associated legislation to coastal zone as well as way from public and national security areas should be taken into account.

EETT, during the preparation for a Public Consultation, asked all the responsible and co-responsible bodies granting installation rights, to inform in writing on the authorisation rights and the calculation of the related fees. In parallel, meetings have been held in EETT's

premises in order to accomplish the optimum possible information and participation of all competent bodies and organisations.

When all views from responsible bodies and electronic communications providers have been collected and after thorough study of the international and European best practices, EETT, at 12 December 2006, started the Public Consultation on the Rights of Way of Electronic Communications network. The text is publicly available at EETT's web site³⁷.

EETT will announce the results of the Public Consultation the first months of 2007, when the relevant draft to the Minister of Transport and Communications is expected to be sent.

3.3.3. Mergers/Acquisitions

The market of electronic communications in 2006 was characterized by important reforms, confirming the trend that companies-providers seek their further development through mergers and acquisitions. In more detail, the most significant agreements that took place were:

I. Acquisition COSMOTE SA-GERMANOS SA

In May 2006 a proposal was submitted to EETT and Competition Authority regarding the acquisition by COSMOTE of 42% of GERMANOS SA and MOBILBEEP Limited Partnership, which is controlled by LIMACON Co LIMITED. EETT undertook the responsibility to review this proposal, due to its exclusive authority.

The above-mentioned consolidation of the two companies is basically a "vertical" concentration, as COSMOTE mainly operates in an "upper-level" market (provision of services) comparing to that of GERMANOS (distribution of services). Nevertheless the

³⁷ www.eett.gr/opencms/sites/EETT/Electronic_Communications/Telecoms/Licencing/LicencingConsultations.html.

consultation displays at the same time elements of “horizontal” concentration taking under consideration that Cosmote holds a limited number of shops partly competitive to those of Germanos ABEE.

EETT analyzed the effect of concentration in the markets of distribution³⁸ and provision³⁹ of Electronic Communication services, by examining the structure of these markets (and sub-markets) as well as the market shares of the providers which operate in these, before and after the acquisition.

EETT concluded⁴⁰ that there are no basic reasons to forbid the acquisition under examination. Besides, EETT judged that the cooperation of GERMANOS with competitors of the OTE group should continue only for a limited time period (as long as the relevant agreements last) in order to protect market competition.

2. Merger FORTHNET-MEDITERRANEAN BROADBAND ACCESS SA

At the end of 2005, MEDITERRANEAN BROADBAND ACCESS SA informed EETT of its aim to proceed with merging (through acquisition) with its parent company FORTHNET, setting the latter as its exclusive right-holder of the Special License it possessed.

EETT issued a Decision approving the merger of the two companies, as MEDITERRANEAN BROADBAND ACCESS SA was a 100% subsidiary company of FORTHNET, as well as the transfer of the Special License, given the fact that FORTHNET satisfied all relevant requirements.

3. Merger Q-TELECOMMUNICATIONS-HELEN GAC SA

Q-TELECOMMUNICATIONS and HELEN GAC SA Telecommunications submitted to EETT their proposal for merger through the acquisition of the first company by the second. EETT, after examining all the data

submitted by the two parts and confirming that the merger under examination conformed with the holding telecommunication and competition legislation, issued a Decision⁴¹ approving this acquisition.

3.3.4. Carrier Pre-Selection

In the field of Carrier Pre-selection, the main issues that arose during 2006 concerned the briefing of consumers and the observation of Carrier Pre-Selection procedures by the providers, as well as the obligation of OTE not to disclose information on Carrier Pre-Selection from its wholesale to its retail division. These issues rendered the intervention of EETT necessary on a supervisory or monitoring level.

Concerning these issues, EETT carried out urgent self appointed on site audits – autopsies in the offices of electronic communications companies, as well as hearing procedures of the providers either self appointed or upon the submission of complaints by subscribers.

More specifically:

- Hearings took place and fines were imposed on the companies TELLAS⁴² 100,000 Euros fine, TELEDOME 100,000 Euros fine (for an infringement during the period where the former Regulation on Carrier Pre-Selection was in force)⁴³, FORTHNET⁴⁴ 70,000 Euros fine and ALTEC⁴⁵ 10,000 Euros fine, for non solicited activations or/and non solicited cancellations of Carrier Pre-Selection on subscribers.
- The issuance of EETT’s Decisions on the Hearings of the companies TELEDOME and TELLAS, upon the submission of complaints by subscribers, and of OTE, concerning the observation of its obligation not to disclose information from its wholesale to its retail division, is pending.
- A fine was imposed⁴⁶ on OTE (liable for the Provision of Carrier Pre-Selection), after the submission of

³⁸ For the purposes of this concentration, the market of distribution of Electronic Services is divided in the following sub-markets: provision of mobile telephony services, provision of fixed telephony services, provision of Internet access, provision of ADSL services and provision of telecommunications equipment.

³⁹ For the purposes of this concentration, the market of provision of Electronic Services is divided in the following sub-markets: provision of mobile telephony services, provision of fixed telephony, provision of Internet access and provision of ADSL services.

⁴⁰ EETT Decision 399/01116-08-2007.

complaints by the Carrier Pre-Selection providers, of a sum of 1,000,000 Euros for the period where the former Carrier Pre-Selection Regulation was in force (during 2005) and of 2,000,000 Euros for infringements of the competition legislation. In parallel, a fine of a sum of 259,500⁴⁷ Euros was imposed on OTE, for the infringement of an Interim Order imposed by EETT.

Moreover, in 2006 the drafting by the providers of the Code of Conduct for the provision and the operation of the Carrier Pre-Selection service began and is expected to be submitted to EETT for approval in the beginning of 2007.

In parallel, EETT gained access in the informational system of OTE, which is used by all the providers for the facilitation of the Carrier Pre-Selection demands, resulting to a better follow up of the market and to the discovery of possible malfunctions.

3.3.5. Number Portability

Number Portability continued to attract the attention of consumers, thus resulting in an increase of fixed and mobile telephony numbers transferred. In 2006 Number Portability doubled in relation to the previous year, as 162,565 fixed and mobile telephony numbers were transferred to another provider, while 77,044 were transferred in 2005 and 17,279 in 2004.

It is worth noting that the total number of subscribers that kept their phone numbers switching to another telecommunications provider, since March 2004⁴⁸ and until the end of 2006, amounted to 256,888. 183,531 of them were mobile telephony numbers and 73,357 were fixed telephony numbers.

The above mentioned data, in combination with the fact that in fixed telephony the expected increase of the LLU

access providers shall be combined, mainly, with fixed telephony Number Portability, are leading to promising estimations for an important augmentation of the numbers to be transferred during the following year.

3.3.6. Cost Audits

Cost audit pertains to the cost of retail and wholesale services offered by OTE and simultaneously the audit of cost-orientation (or reasonable price) of the tariffs applicable to the services that are under regulation. Retail services included in the OTE costing system include, among other services, the monthly rental for PSTN and ISDN-BRA lines, local and national telephony, retention fee for mobile phone and Leased Lines. Wholesale services include, among other services, call origination and termination, wholesale Leased Lines services, and LLU services.

During 2006, the most important outputs of the cost audit are the followings:

- The results of the audit of the costing system of OTE for the year 2005⁴⁹, which led to the identification of cost-oriented prices for the services of Interconnection, Leased Lines and Voice Telephony for the year 2005, have been approved by the Plenary of EETT. It should be mentioned that the delayed completion of the cost audit was due to OTE's behind schedule submission of cost data. The most important output of the above cost audit was that for the first time, cost-oriented prices were derived regarding the services of Leased Lines, both at wholesale and retail level, (digital and analogue, as well as the respective connection fees), including Interconnection Leased Lines. Additionally, the monthly rental fee of the fully Unbundled Local Loop was proved to be cost-oriented as well as the retention fees to geographic and non-geographic numbers of other fixed networks.

⁴¹ EETT Decision 388/11/30-05-2007.

⁴² EETT Decision 409/82/08-11-2006.

⁴³ EETT Decision 412/042/29-11-2006.

⁴⁴ EETT Decision 412/040/ 29-11-20006.

⁴⁵ EETT Decision 412/041/29-11-2006.

⁴⁶ EETT Decision 412/043/ 29-11-2006.

⁴⁷ EETT Decision 409/81/08-11-2006.

⁴⁸ When the operation of the National Reference Data Base for Number Portability (NRDBNP) began, that is the special data base

for the facilitation of Portability in Greece.

⁴⁹ EETT Decision 381/01/03-04-2006,

GG Issue 681/B/2006.

- EETT, regarding the pricing policy of OTE for voice telephony services, Leased Lines, Interconnection and LLU Services for the year 2006 and having taken under consideration cost audit results of year 2005 as “indications” of the cost of relevant services, issued a Decision⁵⁰ in which temporary tariffs that will remain into force, for the year 2006, until the determination of cost oriented prices has been specified. Basic components of this Decision were the consideration of the fact that OTE had not submitted to EETT, in July 2005, as owed to, the information regarding the cost audit for the year 2006 (reported actual data for the year 2004), as well as the belief that the non-compliance of OTE to its obligations as specified by law cannot lead to limitation or deceleration of the development of the competition in the market .
- In September 2006, EETT started the OTE cost audit of 2006. The submission of the majority of the cost data started at the first days of September and completed into the same month. The results of the audit are going to be announced in January 2007.

Moreover, EETT detected that OTE proceeded to infringements in the applying legislation that rules the submission of costing data to be audited by EETT. In detail, EETT has imposed on OTE in June 2006 the following⁵¹:

- A fine standing at 1,000,000 Euros for the delayed, by one year, submission of costing data, within the framework of cost audit for the year 2005. OTE owed to submit to EETT, already from July 2004, any necessary data for the cost audit.
- Fine standing at 1,000,000 Euros for non submission of costing data within the frame of conducting the costing audit for the year 2006. OTE owed to have submitted to EETT from July 2005, any necessary data for the cost audit.
- Fine standing at 500,000 Euros for the non timely submission to EETT of the total report data/

information in order for the latter to control whether OTE conforms with the competition legislation. As EETT did not have the aforementioned report data, which were necessary for controlling the compatibility of the applied prices with the competition legislation, could not proceed to report auditing of OTE's tariffs.

3.3.7. Electronic Signature

During 2006, in the context of its competences in the field of Electronic Signature certification services, EETT conducted a short analysis of their operational framework. The goal of EETT was to promote Electronic Signatures in the Greek market and in the electronic government applications, as well as to strengthen its monitoring work. In this frame, EETT proceeded to the following actions:

- Proclamation of a concise procedure (competition), published on the 28th of December 2006, of a budget of 135,000 Euros, for the selection of a subcontractor who shall perform audits on supervised Electronic Signatures Certification Service Providers (CSP's). The work consists of conducting three audits on supervised CSP's for the ascertainment of their conformity to the criteria and the conditions that have to be fulfilled for the production of simple or recognized certificates, as well as the provision of advisory services to EETT concerning the issues of the audits.

Moreover, the said work includes two extra audits on CSP's selected by EETT during the time period of the contract.

- New invitation, addressed on October 2006 in Greece and abroad, to persons that are interested to become an empowered institution for the conduct of audits.
- Communication between the Greek Public sector

⁵⁰ EETT Decision 381/2/03-04-2006, GG Issue 558/B/2006.

⁵¹ EETT Decision 392/025/22-06-2006.

institutions that use or intend to use Electronic Signatures and their promotion to the existent or the future applications of electronic government. This action is expected to continue during the next year.

- Effort to determine the constitutional issues concerning the application of Electronic Signatures in the Greek Public sector. This action is also expected to continue during the next year.

3.3.8. Domain Names Assignment

During 2006, the rate of increase of the number of applications and assignments with [.gr] suffix Domain Names remained at very high levels. The dynamics presented in the previous year, due to the entering into force of the new Regulation on Management and Assignment of Domain Names, was expressed, during 2006 as well, with a 36% augmentation of the total number of the domain names assigned. The total number of the Domain Names assigned, including the sub-domains (com.gr, net.gr, org.gr, edu.gr, gov.gr) is presented in Table 6.

In parallel, the interest for the assignment of Domain Names with Greek characters continued, though apparently diminished. More concretely,

there were 974 applications and 805 assignments of Domain names with Greek characters. Table 7 shows the number of applications per month during the time period January 2006 – December 2006.

Table 8 shows the number of assignments per month during the time period January 2006-December 2006. It is important to note that in order for the numbers, shown in the applied and assigned Domain Names Charts, to be comparable, the date of the application and not the date of the Decision of EETT on the assignment or rejection of the application was set as reference.

An important element that arises from the above mentioned statistical data and confirms the maturation of the market, as well as the effectiveness of the Regulation on Management and Assignment of Domain Names, is the important increase of the average percentage of assignments in relation to the applications. In 2006 this percentage amounted to 91% compared to 87% in 2005.

It is noted that decisions on hearings held by EETT are subject to judicial control in accordance with the applicable law.

Table 6 – Assigned Domain Names with the [.gr] Suffix, 2005-2006

Domain Level	2005	2006
gr	118,017	160,734
com.gr	5,055	6,558
net.gr	485	645
org.gr	310	551
edu.gr	415	342
gov.gr	68	93
Σύνολο	124,350	168,923

Table 7 – Number of Applied Domain Names with the [.gr] Suffix, 2006

Month	Latin	Greek	Total
January	5,829	97	5,926
February	5,343	97	5,440
March	5,968	193	6,161
April	5,007	95	5,102
May	5,434	58	5,492
June	5,227	67	5,294
July	4,762	38	4,800
August	3,552	59	3,611
September	4,955	54	5,009
October	5,154	123	5,277
November	5,788	38	5,826
December	4,576	55	4,631
Jan. – Dec. 2006	61,595	974	62,569

Table 8 - Number of Assigned Domain Names with the [.gr] Suffix, 2006

Month	Latin	Greek	Total
January	5,107	74	5,181
February	4,883	92	4,975
March	5,273	114	5,387
April	4,533	86	4,619
May	4,964	54	5,018
June	4,430	57	4,487
July	4,424	37	4,461
August	3,268	50	3,318
September	4,525	52	4,577
October	4,863	119	4,982
November	5,367	38	5,405
December	4,238	32	4,270
Jan. – Dec. 2006	55,875	805	56,680

3.4. Controlling and Monitoring Actions of EETT

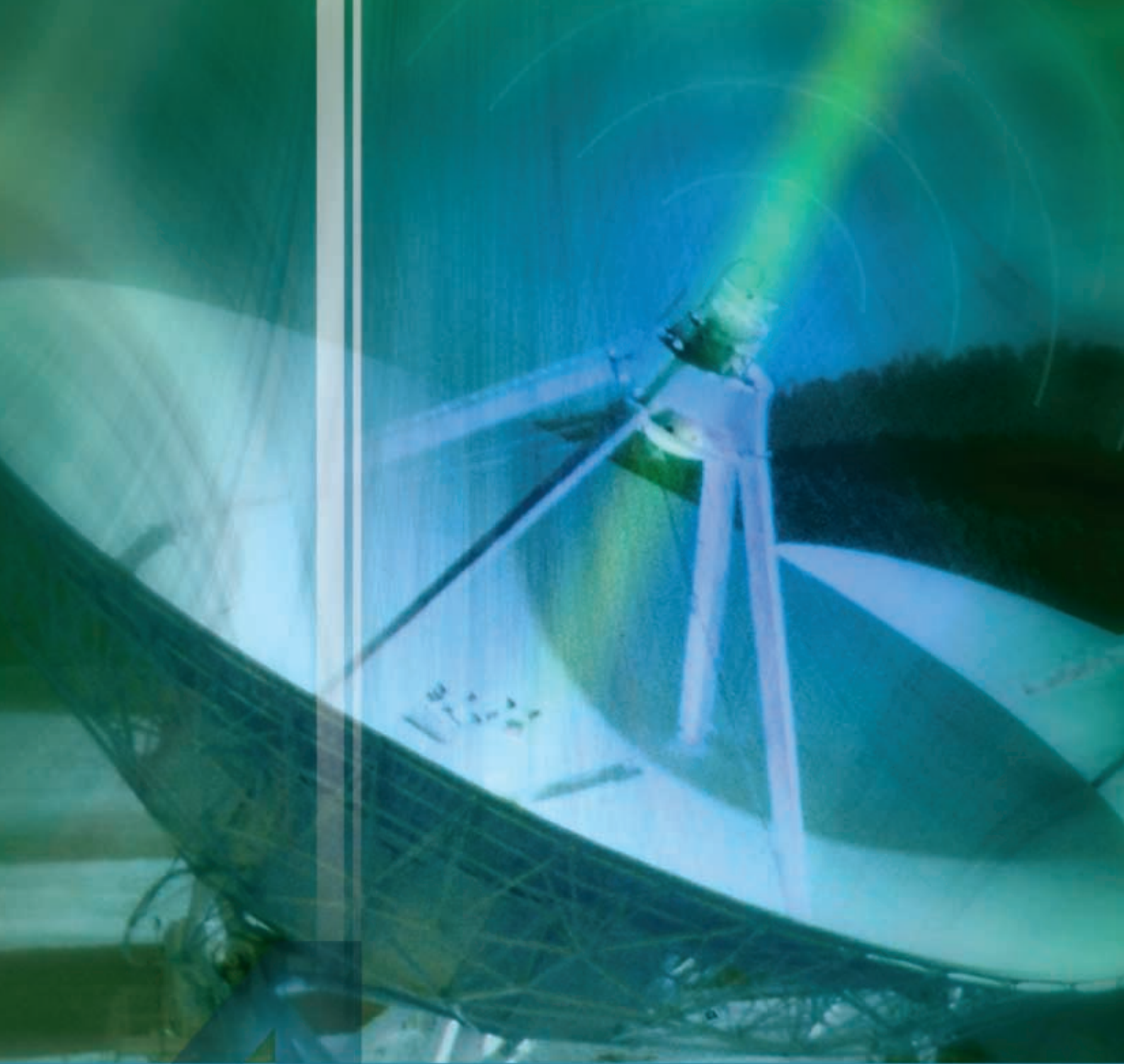
Subject	Number of Hearings	Fine	Recommendation	Release	Other Sanctions/ Decisions
Carrier Pre-Selection	8	8			
Costing Issues	3	3			
Interconnection-Numbering	2	1	1		
Other	2		1		1
Domain Names with the [.gr] Suffix	92	-	9	15	68
Total	107	12	11	15	69

3.5. Goals

EETT actions for 2007 on Electronic Communications result from the new Law (L.3431/2006) and the need for the prompt completion of the transition to the new environment. In this context, the immediate priorities of EETT include:

- Continuous promotion of Broadband. Emphasis shall be placed initially at the enhancement of “broadband infrastructure level” and of “knowledgeability” (Broadband content and services) infrastructure.
 - Systematic supervision and monitoring of the compliance of the primary and secondary legislation, in order to ensure a healthy competitive environment, to promote and protect the interests of the users.
 - Further enhancement of competition, especially at infrastructure level (emphasis on the promotion of LLU) and continuous development of fixed and mobile telephony markets in favour of consumer interest.
 - Control of the quality of services that are provided by all the telecommunication companies.
 - Continuous development of a “new market” by the creation of innovative services double-play (combination of voice and internet), triple-play (combination of voice – internet and television) as the prospective provision of services quad-play (with the embedment of mobile telephony).
- More specifically, the main goals for EETT for 2007 are the following:
- Completion of the issuance of the legislation that needs to be published according to L.3431/2006, especially to the following regulations that are necessary for the whole implementation of the New Regulatory Framework:
 - Regulation on the Management and Assigning Numbering Resources on behalf of the National Numbering Plan.
 - Proposal of EETT to related Ministries for the specific procedures on the provision of Rights of Ways.
 - Regulation on the format of Universal Directories.
 - Completion of regulatory obligations that were imposed or have been imposed resulting from market analysis, according to L.3431/2006.
 - Completion of the regulation on terms of granting radiofrequencies and converting them to specific individual radio frequencies.
 - Implementation of the new framework of US.
 - Regulation on the provision of VoIP.
 - Identification of the quality of service indicators, that have to be measured and published from telecommunications service operators aiming to consumers information.





Radio Frequency Sector

4. Radio Frequency Sector

In the sections below, a description of EETT actions that have been taken place during 2006, is provided. Those actions concern the Radio Spectrum Management and Monitoring issues, as well as the Radio Equipment and Telecommunications Terminal Equipment (RTTE) activities.

The main work of EETT in the Radio Frequency Sector, in addition to the faster and higher-quality exercise of its duties, was focused on the publication of regulatory actions, deriving from the application of the New Law on Electronic Communications and the adaptation of EETT operations to its provisions, in the most optimized and effective way.

4.1. Radio Frequency Rights of Use and Spectrum Monitoring

4.1.1. Fixed Service

The Fixed Service includes radio communications networks at specified fixed points used:

- Either for the provision of public Electronic Communications services.
- Or to meet private telecommunications needs.

In most cases, Radio frequency Rights of Use are required for the operation of these particular radiocommunications networks. In 2006, 1,000 Rights of Use were granted in total for "Point-to-Point" links, primarily concerning telecommunications services providers' networks. Also, 130 Rights of Use were granted to meet the private telecommunications needs.

Moreover, EETT received 12 complaints regarding radio links of the fixed service, 6 of which concerned interference to licensed radio links of TV stations and mobile telephony providers, while the rest 6

were about the legitimacy of those radio links. All the above complaints were successfully resolved.

Moreover, during 2006, EETT registered and proceeded to an extensive control of radio links signals illegally transmitted in the zones already assigned to GSM/DCS/UMTS mobile telephony providers. During those controls, conducted all over the country, 102 radio stations signals were located to transmit in the above frequency bands. According to law provisions, EETT recommended those radio stations to cease their operation and to proceed to the granting of Rights of Use. Most of them complied with EETT requests while to the remaining stations, law provisions were imposed.

4.1.2. Satellite Services

The installation and operation of satellite earth stations requires national and international coordination with existing fixed and satellite service terrestrial networks in order to avoid interference. EETT, being responsible for the aforementioned coordination, applied the provisions according to the International Telecommunication Union (ITU), and harmonized satellite stations in 2006 (domestic and foreign) with the existing terrestrial wireless networks. Moreover, EETT notified the domestic satellite earth stations to the Ministry of Transport and Communications (MTC), in order to be communicated to ITU, as required by the International Radio Regulation.

EETT, in 2006, licensed 7 infrastructure satellite earth stations (HUB topology) as well as 5 VSAT topology dependent stations, which correspond in total to 51 frequency pairs in the Ku band. It should be noted that the granting of Rights of Use for the specific frequency pair, constitutes an indicator for the evolution of Broadband infrastructure in the country.

Moreover, 5 complaints for interference in satellite data gathering systems were submitted in 2006 by the Hellenic National Meteorological Service (HNMS), European NRAs and Port Authorities, as well as 2 complaints for legal control of satellite antennas. Most interference problems are due to Fixed Service earth radio links, which interfere satellite earth receivers. EETT promptly performed all necessary measurements and inspections to resolve these problems. At the same time, EETT regularly performs inspections at the specific frequency bands.

4.1.3. Mobile Service

Mobile Telephony Networks

This category includes wireless digital sound and data transmission systems, using the GSM/DCS/UMTS cellular technology, the operation of which requires license from EETT.

In 2006, EETT received 68 complaints related to interference in the spectrum assigned to Mobile Telephony Providers (MTP) and more specifically in the reception frequencies of base stations, communicating with mobile telephones.

The main sources of interference were:

- Radio link systems used for the video and audio signals transmission from radio and television stations and military agencies.
- Systems impeding the use of mobile telephony devices (GSM Jammers).
- Interference transmissions from Broadcasting FM Radio and TV stations.
- Defective systems of home amplifiers TV receivers.

EETT technical units took all the necessary actions for the immediate investigation and resolution of complaints.

Private Mobile Radio Networks

The term Private Mobile Radio (PMR) networks is used to describe mobile service private networks which meet communication needs of various business users, such as communication networks used by several transport companies, radio-taxis e.t.c., as well as networks used for emergency services, like the Fire Brigade (FB) and the National First Aid Centre (NFAC). EETT is responsible for the granting of frequencies Rights of Use for PMR networks. The relevant licenses for PMR Networks are issued by the Prefectural Authority, following EETT's concurring opinion.

In 2006, in total 111 requests were submitted for local and regional range networks. The respective Rights of Use were granted in 53 cases, while 12 applications with insufficient data were returned to the respective Prefectural Authorities for resubmission. Of the above applications 2 were related to temporary Rights of Use granting for athletic events (sports events) and for PMR networks used by foreign delegations visiting Greece.

In addition, EETT granted in a temporary basis 2 meteorological radars as well as supportive frequencies used by telemetry and voice transmission for antihail protection.

Concerning monitoring issues, in 2006 EETT received 47 complaints for interference related to PMR networks, of which 14 concerned critical radio networks and have been dealt with priority. The rest 33 complaints related mainly to other

radio networks, like those used by radio taxis, bank networks, Municipality radio networks and private companies networks. The majority of them were related to interference to other radio networks and Radio and TV stations (broadcasting stations) as a result of using non licensed radio frequencies. Moreover, in 2006 EETT received 8 complaints related to the illegal operation of PMRs.

In all cases, technical inspections were performed and the necessary actions to resolve problems were immediately scheduled, with the imposition of sanctions, where necessary.

4.1.4. Services Ancillary to Broadcasting and Program Making

An important category of services includes services ancillary to video and audio signals transmission. Examples of such services are the coverage of a sports event, an open show or an emergency. For the coverage of such events, radio equipment, such as wireless cameras, wireless microphones, portable microwave links and audio systems, is required. EETT temporarily grants radio frequencies Rights of Use to cover scheduled events with a maximum duration of 2 months.

In 2006, following submission of applications, radio frequencies Rights of Use were granted to 9 Satellite News Gathering (SNG) stations. The aforementioned applications mostly concerned video and audio for the coverage of special events such as VIP visits and various athletic events by users from abroad. Moreover, 9 microwave radio frequencies Rights of Use were granted to radio stations for the needs of a Greek television station (coverage of Marathon and reality show) and 6

radiofrequencies for the audio and data transmission within the Department of Attiki.

4.1.5. Radio - Television

EETT's authority in radio and television issues is limited to granting Rights of Use for the radio and TV radio links, as well as to spectrum monitoring. Moreover, EETT has the competency to impose administrative penalties to stations using illegal radio links. In this context, EETT holds relevant Hearings.

The situation concerning radio-television landscape in Greece remained the same as in previous years, since licensing of TV and radio stations is pending, as is the subsequent organization of antenna parks at locations constituting broadcasting centres. This resulted in:

- A number of illegal emissions, both in urban centres and the province, especially non-licensed installations at broadcasting centres.
- Mutual interference between TV and radio stations.
- Spurious interference with air navigation services.
- Interference with other services and spectrum uses.

EETT has repeatedly pointed out that the licensing of Radio and TV stations in Greece, as well as the organization and inspection of installations of those stations at Broadcasting Centres, is required in order to safeguard the legal and effective broadcasting spectrum use as well as the protection of legally operating users from interference.

In addition, EETT through regular inspections ensures the efficient management of interference and contributes to the discontinuance of illegal broadcasts.

Complaints

In 2006, 137 complaints related to interferences, illegal broadcasts and illegal radio-television station installations were recorded:

- 69 for radio stations within the region of Attica and 364 for stations outside Attica.
- 46 for television stations within the region of Attica and 217 for stations outside Attica.
- 22 antennas and broadcasting centres within the region of Attica and 32 outside Attica.

EETT proceeded to the investigation of the majority of the aforementioned complaints, while in some cases where complaints related with problems in remote areas from the regions of Attica, as the regions of South and West Greece, the collaboration of the respective Prefecture Authority was requested.

In the cases of complaints related to licensed and legally operating television and radio stations, technical control reports were forwarded to the National Radio-Television Council (NRTC), which is the responsible body for the imposition of administrative penalties according to the provisions of the radio-television legislation.

In the cases of television and radio stations where the NRTC pronounced that are illegally operated, EETT briefed in writing the respective authorities (Police, Public Prosecutor) on the application of the penal provisions. EETT, in collaboration with those authorities, ceased illegal transmissions during operations during which there were confiscated:

- 41 radio stations and 6 TV stations within the region of Attica.
- 7 radio stations, 18 TV stations and 3 radio links of radio stations in the rest of the Territory.

Recording of Radio and Television Stations all over the Greek Territory

The imprint of the broadcasting centres and of the frequencies used by the radio and television stations, all over the Greek territory constitutes – due to the lack of licensing - a significant tool for the management and control of Radio-television Spectrum.

In 2006, EETT's technical units performed recordings in 20 Prefectures all over the Greek Territory, the results of which were forwarded to the National Radio-Television Council (NRTC), which is the competent National Regulatory Authority for investigating the legal operation of radio – television stations. Based on the findings of the recording, the total number of operating private radio stations per Prefecture is on average triple or in some cases quadruple, compared to the number of broadcasts specified in the Frequencies Charts. This resulted in an increased possibility of harmful interferences to legal users of the Spectrum, as well as a decreased quality of the provided service.

Beyond the aforementioned investigations, EETT carried on with the task of updating the imprint of television broadcasts installations in the Broadcast Centre in the region of Attika and Thessaloniki. The aim of this update was for EETT and all other competent bodies to be aware of the existing situation in the broadcast centres of Athens and Thessaloniki, in order to deal more efficiently and imminently with the problem of harmful interferences.

EETT, jointly with Athens Prosecutor's Office and the State Forces, proceeded to the inspection of all installations that have not been declared by the legal stations, in the Hymettus Broadcast Centre. This operation resulted in the termination of all illegal

broadcasts, all illegal active equipment has been confiscated, with simultaneous dismantlement of the relevant antenna systems. The mapping of all illegal containers has been sent to Pentelis Forest Inspection which posted the demolition decisions.

In the illegal broadcast centre of FM Radio and TV stations in the location Pirovolia of mount Egaleo, EETT in collaboration with the Piraeus Prosecutor and the State Forces proceeded in the inspection of all broadband FM Radio and TV installations. This resulted in the termination of all illegal broadcasts, the confiscation of all illegal active equipment and the simultaneous dismantlement of the relevant antenna systems. Control Reports have been sent to the Public Power Corporation (PPC) which proceeded to the power cut of each supply belonging to illegal users, while the Piraeus Prefecture has been informed so as to proceed in the clearance of all illegally installed containers.

As far as it concerns Thessaloniki region, EETT proceeded in repeated inspections aiming at the precise imprint of broadcasting positions of FM radio and TV stations in Chortiatis broadcasting centre. Related results have been forwarded to Thessaloniki State Force as well as the co responsible Services (Forest Inspection, Town Planning Department) in order for them to proceed with actions of their responsibility.

4.1.6. Air Navigation and Other State Services Networks

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

In 2006 most of the problems were related to the

CAA networks (108 - 137 MHz) due to the adjacency with the FM radio broadcasts band (87.5 - 108 MHz). The large majority of interferences occurring in these networks is due to the lack of licensing and, consequently, to the lack of harmonization of radio stations all over the Territory. This fact results in preventing the smooth operation of radio aids and CAA communications. Problems were also encountered, in 2006, in the CAA telecommunications centres, due to their adjacency with the transmitters of radio television stations.

EETT monitors the air navigation spectrum all over the Greek Territory on a permanent basis, aiming at dealing with the above problems. Inspections were performed with the assistance of Fixed Monitoring Stations (FMS), which have been installed by EETT at Athens International Airport (AIA) and at the airports of Heraklion and Rhodes, as well as with the assistance of the Mobile Monitoring Stations (MMS), mainly for the areas outside Attica and Thessaloniki. The interference problems that CAA faces, are expected to be limited only with the implementation of licensing of radio stations in the Territory and when physical planning and antenna installations control regulations are imposed on the broadcast centres.

In 2006 EETT has received 190 complaints for interferences in CAA telecommunications systems, of which 62 were related to interferences in flying aircraft communication receivers, 124 related to land communication receivers and 4 related to radio aids. EETT has forthwith taken action and resolved the total of interference cases in land receivers and radio aids. In one interference case in the airports of Chios and Samos caused by Turkish FM Radio and TV stations, EETT informed promptly the respective Turkish body through the MTC, having as result the adequate resolution of the problem.

In 2006 EETT has received 14 complaints for interferences in the State Security and Emergency Networks, which have been investigated and resolved imminently, as a priority.

4.1.7. Radio Amateurs

Radio amateurs install, apart from radio amateur stations, retransmission stations, which enable the communication between regions where, due to their geomorphology, there could not be any direct communication. MTC must grant approval⁵² for the operation of a radio amateur station.

The constantly increasing number of retransmitters makes their coordination essential, in order to achieve operation free of interference. In 2006, EETT received 27 applications concerning 135 stations, which have been all processed. In total the results of the coordination study on radio amateurs retransmitters and repeaters have been sent to MTC, which has the competency of granting the relevant approvals.

In 2006, EETT received 33 complaints for radio amateur communication systems. The complaints were related to illegal broadcasts, interferences to legal radio amateurs and requests on behalf of radio amateur stations owners or individuals in order to confirm their proper operation. In all cases, all necessary measurements, inspection of equipment and of licence documents, were performed in order to confirm proper operation and compliance with the applicable legislation.

4.2. Antenna Mast Constructions

4.2.1. Antenna Mast Constructions Licensing

During 2006, EETT received 920 new applications for

antenna mast constructions licensing, of which 20 were processed. Based on the new EETT's, Antenna Mast Constructions Licensing Regulation⁵³, the Environmental Terms Approval must be issued, prior to antenna construction licensing. As the majority of the applications is not completed, they remain pending, since applications can be submitted without the completion of the Environmental Terms Approval.

4.2.2. Illegal Installations of Mobile Telephony Antenna Masts

In 2006, EETT has received 871 complaints for mobile telephony antenna mast constructions. Following a thorough investigation it was found that 752 cases concerned licensed antennas, on the legitimacy of which the complaining parties/ applicants were informed.

The remaining 119 concerned non-licensed constructions. EETT's technical units have performed in total 70 autopsies in mobile telephony base stations, 60 of which were performed within the region of Attica and 10 outside the region of Attica. 22 autopsies have been performed by the Regional Office of Thessaloniki. The collaboration of the competent Prefectures has been requested for the performance of 27 complaints.

4.3. Ensuring Compliance of Radio and Telecommunications Terminal Equipment

Placing on the market and use of RTTE is free in all state members of the European Union (E.U.), provided the following conditions are met:

- Protection of health and safety.
- Protection with respect to electromagnetic compatibility (without causing electromagnetic disorders).
- Effective use of radio frequencies spectrum so as

⁵² MD fin.68000/762/2002, GG Issue 1579/B '18-12-2002.

⁵³ 7 EETT Antenna Mast Construction Licensing Regulation according to Law 3431/2006 (GG Issue 1666/B/14-11-2006).

to avoid harmful interference.

- The compliance of equipment with those specific conditions is denoted by the special CE and CE! marking.

EETT is the competent Authority⁵⁴ for ensuring the placing of legal RTTE on the Hellenic market.

4.3.1. Publication of Radio Interfaces

By means of its Decision⁵⁵, EETT approved the interface where the technical characteristics of Short Range Devices (SRDs) used for Wireless Access Systems are specified, including Radio Local Area Networks (WAS/RLAN), operating in the radio frequency bands 5150-5250MHz, 5250-5350MHz, 5470-5725MHz, 17.1-17.3GHz. The interface draft was under Public Consultation at E.U. web site concerning the national technical regulations, according to the Directive 98/34/EC (TRIS), from 04-08-2006 up to 06-11-2006 (notification number 2006/414/GR).

4.3.2. Publication of Interfaces of Telecommunication Providers

By means of its Decision⁵⁶, EETT had specified those providers that must publish the interface specifications, through which telecommunications services are provided to the public. 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.

In 2006, EETT continued performing the necessary examinations of the content of the interfaces published by the telecommunications providers and in cases where omissions have been found, EETT has informed the responsible providers.

4.3.3. Management of Radio Equipment Notifications

In cases of radio equipment using non-harmonized frequency bands all over the E.U.⁵⁷, the radio equipment manufacturer, or his authorized representative in the E.U., or the responsible person for placing the equipment on the market must notify to EETT the technical characteristics of the equipment and its intention to place it on the market. In 2006 EETT handled 1,152 radio equipment notifications.

4.3.4. Market Surveillance

EETT performs administrative and technical controls of RTTE market, in order to ensure that the equipment placed on the market complies with the requirements mentioned above. Thus, EETT is actively contributing to the protection of consumers and the avoidance of harmful interference.

In 2006, EETT performed regular controls in RTTE distribution stores, in Athens and Thessaloniki, and investigated 98 equipment samples covering different RTTE categories.

Moreover, EETT is informed on the developments in the sector of RTTE Market surveillance through its active participation in the Administrative Cooperation Group (ADCO) of the European Commission and by exchanging experiences with the respective European authorities.

⁵⁴ PD 44/2002.

⁵⁵ EETT Decision 414/075/13-12-2006.

⁵⁶ 294/55/2003, GG Issue 1590/A/30-10-2003.

⁵⁷ PD 44/2002 and Notifications Regulation

(Decision EETT 296/49/2003, GG Issue 1881/B/17-12-2003).

In this framework, EETT participated in the European market surveillance campaign, which was initiated in September 2006 and was completed in July 2006. In the context of this campaign, administrative and technical controls have been conducted on 10 types of Short Range Devices (SRDs) distributed in domestic market, aiming at drawing useful conclusions regarding the substantial and complete compliance of RTTE at a European level. The results of this campaign will be presented by ADCO during 2007.

4.4. Controlling - Monitoring Actions of EETT

Note that the Decisions over EETT's Hearings are subjected to court control, in accordance with the applying legislation.

4.5. Goals

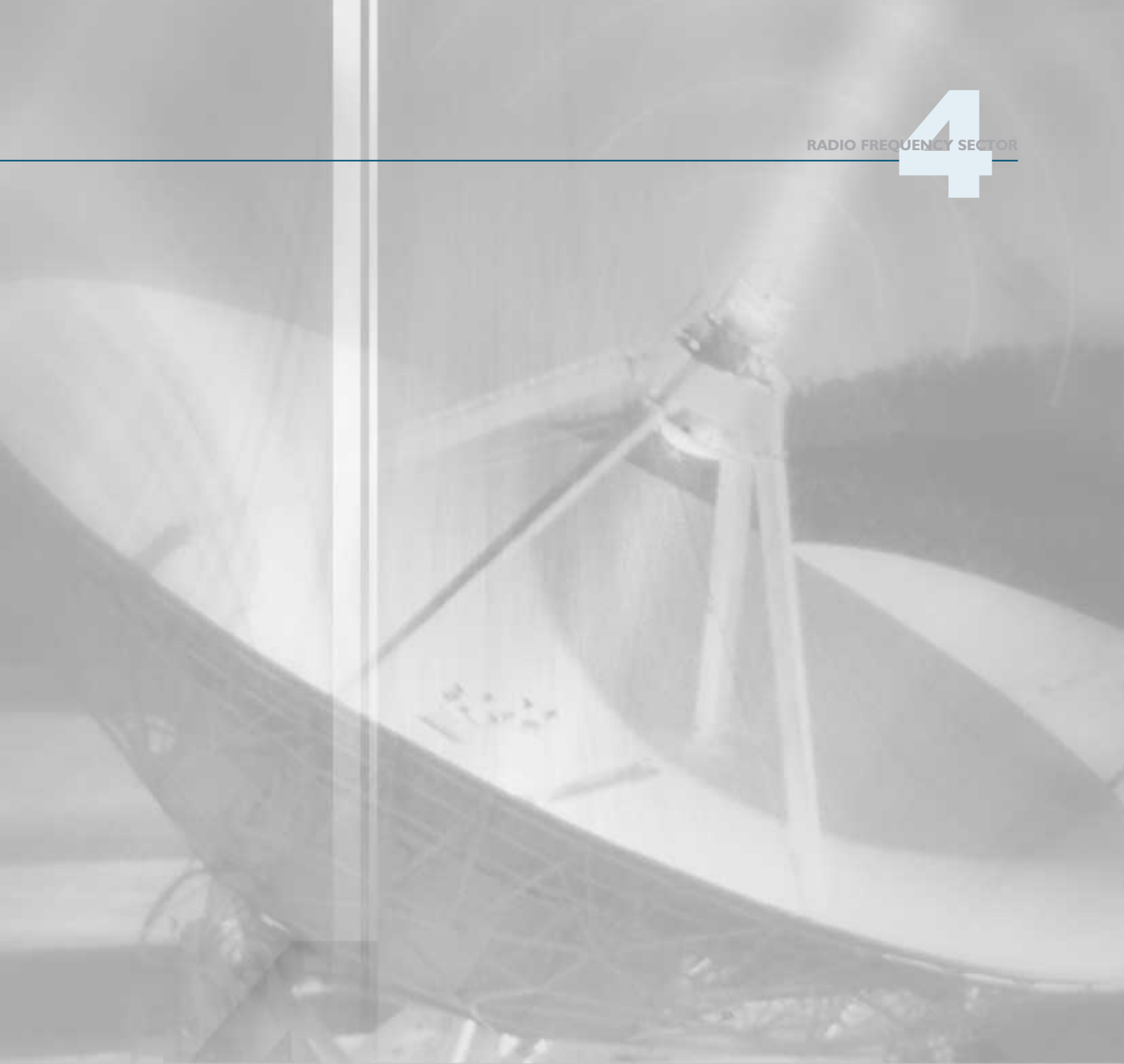
EETT has set the following goals for 2007 in the radio frequency spectrum sector:

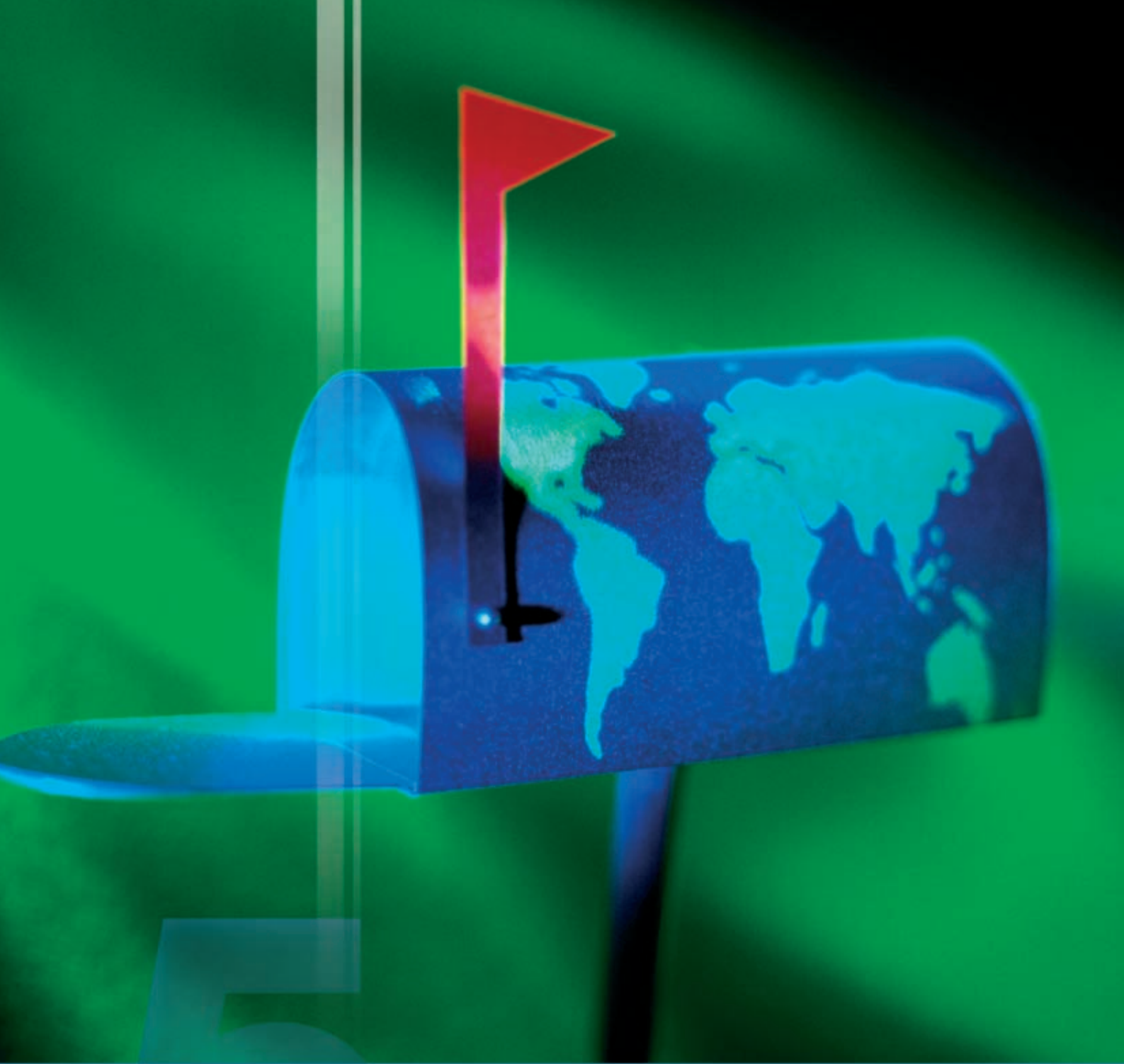
- Complete application of the new regulatory framework in order to allow the introduction and the development of new wireless applications and

services for the interest of the consumers. It is noted that the new legislative frame abolishes an important part of administrative limitations in accessing the Spectrum.

- Focus on the optimized performance of EETT's duties in the field of managing and monitoring commercial spectrum, in order to facilitate users access to the available spectrum, to ensure its efficient distribution from technical and economic point of view, to meet the imposed terms of use and finally to protect the interests of the citizens and consumers.
- Take off initiatives, in collaboration with other competent bodies, for the elaboration of an efficient framework concerning the mast construction antennas licensing procedure, in order to facilitate the development of wireless networks, respecting at the same time the requirements for safety and health of the citizens.
- Inform the citizens about the wireless technologies, mobile telephony antennas and the electromagnetic energy they radiate, as well as the proper use of wireless devices.
- Optimize the RTTE market surveillance procedures and make more frequent samples controls.
- Initiate procedures for the extension of the National Monitoring Systems in other regions, apart from Athens and Thessaloniki.

Subject	Number of Hearings	Penalty	Composition	Exemption	Other Penalties / Decisions
Mobile Telephony					
Antenna Mast Construction	20	15	-	3	2 License Revocation
Terminal Equipment	40	2	35	2	1 Put on File
Radio - Television	39	7	32	-	
PMRs	1	-	1	-	
Others	4	-	4	-	
Total	300	24	72	5	3





Postal Services Sector

5. Postal Services Sector

During 2006, EETT completed the process of licensing 40 new coming providers of postal services. At the same time EETT held totally 122 audits (22 unscheduled audits, 20 scheduled audits and 80 distance special audits) in the postal market in order to investigate the degree of compliance of postal companies with the current Regulatory Framework. Furthermore, EETT conducted quality measurements of the Universal Service (US) and registered the important steps of quantitative and qualitative progress that took place in the Hellenic Postal market.

5.1. The Regulatory and Monitoring Role of EETT

The gradual model of liberalization of the Postal Market, which is applied in our country as well as in European Union (E.U.), resulted to the re-assessment of the exclusive rights of Hellenic Posts (ELTA) as the Universal Service Provider (USP). Specifically from January 1st 2006, ELTA holds the exclusivity in the distribution of postal items of 1st Priority domestic mail that their weight does not exceed 50 grams. This maximum limit of weight does not apply if the price is equal or bigger 2.5 times the public fees of a letter of 20 grams. of 1st Priority Domestic Mail. It is noted that up to 31-12-2005, the respective limits in a 1st Priority Domestic Mail which was handled exclusively from the USP were set in the maximum weight of 100 grams. that did not apply for postal items with a price equal or bigger 3 times the price of a letter of 1st Priority Domestic Mail with a weight of 20 grams.

The gradual liberalization of Postal Market has resulted to the strengthening of competition for the benefit of the consumer. The European Parliament adoption of the proposed by the European Committee prospective Postal Directive (proposed date of force is January 1st 2009) is expected to play a key role in the course of the full market liberalization. In the context of a fully

competitive market, the existence of supervision mechanisms and modernised audit procedures is regarded as absolutely necessary. EETT conducts, in accordance to its supervisory role, scheduled and unscheduled audits in postal companies aiming at ascertaining possible defective provision of Postal Services and exercise of illegal activity.

During 2006, EETT intensified the audits in the deregulated segment of Postal Market. The recruitment of highly qualified scientific personnel for its supervision mechanism and the restriction of the required bureaucracy for the audits' completion strengthened the supervisory role of EETT. The ultimate goal of the audits conducted by EETT is the realisation by the postal providers of the fact that the harmonisation of their operation to the Regulatory Framework does not simply guarantee the smooth operation of the market, but it also assists the provision of high quality and value added services to the final user.

The audits conducted by EETT derive mainly from the following:

- Complaints submitted by users of postal services for defective or low quality provision of services from registered providers.
- Complaints from registered providers for violation of current legislation.
- Cross-checking of data that the EETT's Postal Services Sector Directorate holds and through which violation of the current postal legislation is established.
- Self appointed, scheduled or unscheduled, audits on registered providers at regular time periods, within the scope of the postal sector' supervision which aim at registering possible problems and promptly resolving them.

The unscheduled audits, which are usually conducted after the thorough examination of a complaint made by a user or provider, examine if the provided services are

included to the framework of Postal Services that is depicted in the Regulation of General Authorizations /Individual Licences. In the case that the audited company provides postal services without the required License, then the law anticipated sanctions are imposed. In 2006, EETT held totally 22 unscheduled controls, the results of which are summarised in Table 9.

The scheduled audits, contrary to the unscheduled ones, took place according to a certain timetable that is being prepared annually by the Postal Services Directorate. Their main concern is the examination of the compliance of the audited companies to the terms of their License. More specifically, the audit report, which is being written after the completion of the scheduled audit, regards the following:

- Any changes in the registry data of the postal company at the date of the audit, compared to the data that were submitted to EETT at the process of awarding the license.
- Identification of possible violation of the exclusive rights of use.
- Deficiencies of the Special Postal Items Track and Trace System (SPITTS), via spot checks on the system's registrations.
- Tariff policy control issues foreseen in the Regulation of General Authorisations /Individual Licenses.
- Observance of the Charter of Obligations to Consumer (COC), registration of statistics in relation to the resolution of differences under COC's scope and detection of any possible problems that emerged during its application.
- Confirmation of the proper operation of Sorting Centres of the audited companies.
- Compatibility of the audited company's network infrastructure with the registered company.

Table 9 - Results of Unscheduled Audits

Conclusions of Unscheduled Audits	Percentage
Ascertainment of interruption of business activity	36%
No infringement was established	23%
Ascertainment of operation without General Authorization /Individual License	18%
Provision of services beyond EETT's competences	18%
Provision of Postal Services under General Authorisation, but the audited company did not use the Special Postal Items Track and Trace System (SPITTS)	5 %

Table 10 - Results of Scheduled Audits

Type of Problem	Frequency
Insufficient registration or absence of data in SPITTS	90%
Improper fees' payment	50%
Insufficient completion of Express Delivery Voucher (EDV)	35%
Non-observance of COC	15%

Totally, in 2006, 20 scheduled controls were performed, and their results are summarized in Table 10. An obvious conclusion drawn from the above Table is that the most important divergence of the audited companies as far as the provisions of their License is concerned, was the insufficient registration or absence of data in their SPITTS.

Taking into account the results of the scheduled controls that were held in 2006, EETT performed 80 additional self appointed distant audits in order to ascertain the sufficiency of the companies' SPITTS. These audits included reception of samples, from the registrations in the SPITTS of the postal items that were handled on specific days during the 1st quarter of 2006 and dispatch of this sample to EETT in a printed and/or electronic form. A thorough examination of the companies SPITTS samples was conducted and its results are presented in Table 11.

It is worth mentioning that EETT's supervisory actions during 2006 aimed not only at repressing, but also at preventing. Within this scope, EETT proceeded in further actions, such as:

- Investigation of complaints made not only by users but also by postal providers regarding the solution of problems that emerge daily in the implementation of postal work.
- Collaboration with Chambers, Tax Offices and other public services aiming at the exchange of data and the

briefing of those institutions on the framework of Postal Services' provision.

The objective of the aforementioned actions was the smooth operation of Postal Market through the minimization of violating behaviours.

The conducted audits in 2006 made clear that there is a large room for improvement regarding not only the width but also the quality of the provided postal services in our country.

5.2. Universal Service

The US includes the distribution of certain categories of postal items (simple postal items 1st and 2nd Priority of Domestic/International mail with a weight up to 2 kilos, parcels of Domestic/ International mail with a weight up to 20 kilos, registered mail or insured Domestic/International items of declared value, that is executed according to specifications depicted in the relative Ministerial Decisions (MDs).

During 2006, the MD 28977/811/21-06-2006 was published regarding the re-definition of the qualitative specifications and the provision terms of Universal Postal Service and replaced the MD 79293/2000. The regularity of US provision from the USP is consisted of at

Table 11 - Results of Self Appointed SPITTS Audits

Conclusions of Self Appointed SPITTS Audits	Percentage
Non submission of data	55%
Absence of SPITTS or insufficient existence of SPITTS according to the specifications of General Authorisations	16%
Absence of any violation according to the effective legislation	29%

least one home distribution for five days during the week. The new MD established the criteria for the regions that are excluded from the regularity of US provision. These criteria refer to the access difficulty via the road/coastal/air network. The prospective regions for exception are examined by a three-member committee which is composed from 2 executives appointed by Ministry of Transports and Communications (MTC) and 1 executive of EETT. The regions, which are characterized by the committee as excludable, constitute an annex of the Contract of Administration that is signed between the USP and the MTC. Furthermore, the new MD, apart from the criteria that characterise a region as excludable from the regularity of US provision, for the validity period of the MD, specifies also the criteria for the provisional interruption of the regularity of US provision as well as the actions that the USP must follow during this period of provisional interruption, in order to ensure a better service for the citizens.

The quality control of the provided services refers to the measurement of the speed indicator and the reliability indicator in regard to the end to end time of distribution of the 1st Priority Domestic/ International Mail.

The quality measurements regarding the 1st Priority Domestic Mail for the period 2005-2006, are accomplished under the control and the supervision of EETT jointly with the USP. The system of measurement is designed by an International company considerably experienced on issues regarding quality measurement of postal services in the European Union.

The system of measurement is designed according to the specifications that are depicted in the effective Directive EN 13850:2002. The measurements which are being carried out using an extensive network of remailers fully allocated to all regions of Greek Territory according to the volume of correspondence that is being handled in those regions, aim at the estimation of:

- The speed indicator, which is defined as the percentage of valid test letters handled from the point of deposit to the point of delivery within one business day from the deposit day.
- The reliability indicator, which is defined as the percentage of valid test letters handled from the point of deposit to the point of delivery within three business days from the deposit day.

The USP is obliged to achieve specific target values for both the speed indicator and the reliability indicator and these values are determined in the MD 28977/811/21-06-2006 for the three-year period 2006-2008. The estimation of the speed indicator, taking into account that its targeted value is being achieved with a statistical error of $\pm 1\%$, requires the dispatch of at least 60,000 valid test letters in order to achieve the aforementioned precision. The measurement system allows for the additional estimation of the factors that effect significantly the indicators of speed and reliability. The results of the measurements for the period of 2002-2006, as well as the quality target values that are described in the above YA, are presented in Table 12.

An obvious conclusion drawn from Table 12 is that while the speed indicator deviates considerably from the target value of each MD, this divergence decreases in the course of time, a fact that signifies the improvement of US quality through the last years, even if there is still room for further improvement. On the contrary, the reliability indicator is closer to the target value, which means that the delivery of about all the 1st Priority Domestic Mail is being handled within 3 days to the desirable destination.

The quality measurements of Incoming/Outgoing International Mail of 1st Priority are attained from the International Postal Union (IPC). The UNEX system records the time of distribution of 1st Priority International

**Table 12 - Results of the Quality Measurement of
1st Priority Domestic Mail**

Year	Semester	USP's Obligation according to MD		USP's Results based on Measurement		
		Speed Indicator (H+1)	Reliability Indicator (H+3)	Speed Indicator (H+1)	Reliability Indicator (H+3)	Average Duration of Delivery (Days)
2002	1 st Semester	77%	90%	48.61%	90.86%	1.91
	2 nd Semester			46.92%	89.01%	1.98
2003	1 st Semester	82%	93%	58.79%	94.87%	1.61
	2 nd Semester			66.95%	96.78%	1.44
2004	1 st Semester	85%	95%	66.06%	95.60%	1.49
	2 nd Semester			65.58%	93.38%	1.60
2005	1 st Semester	85%	99%	69.10%	94.50%	1.46
	2 nd Semester			72.40%	96.10%	1.34
2006	1 st Semester	85%	98%	75.40%	97.30%	1.20

(H = Mailing Business Day)

Mail from the deposit time till the delivery time. In 2004, 18 countries participated in the above measurements, while the corresponding number of countries in 2005 amounted to 29. The target values for the speed indicator (delivery percentage of valid letters handled within 3 days from the deposit country to the delivery country) and the reliability indicator of International Mail (delivery percentage of valid letters handled within 5 days from the deposit country to the delivery country) are determined in the MD 28977/811/21-06-2006. The measurements' results for the Outgoing 1st Priority International Mail for the period 2004-2005 are presented in Table 13 (page 64).

As far as the 1st Priority International Outgoing Mail is concerned, it is remarkable that the quality of provided services features a downward trend for the period 2004-

2005, something that is common for both indicators. Nevertheless, the USP for 2005, as can be easily seen from Table 13, achieved the target quality value (as the latter is defined in the relative MD) for the majority of countries (11 of 17) that participated in the IPC measurements. On the contrary, the reliability indicator fell short of the target value in 13 from 17 countries that participated in the measurements. It is worth mentioning that the above conclusions are also confirmed by the average number of business days (they are not presented here for reasons of space economy) that are required in order to handle a letter from our country to 1 of the 17 countries that are presented in Table 13.

The corresponding results for the 1st Priority International Incoming Mail are presented in Table 14 (page 65):

Table 13 - Quality Measurements of 1st Priority International Outgoing Mail

Country	2004		2005	
	Measurements % (H+3) (Target Values according to MD %)	Measurements % (H+5) (Target Values according to MD %)	Measurements % (H+3) (Target Values according to MD %)	Measurements % (H+5) (Target Values according to MD %)
AUSTRIA	84.4 (85.0)	97.8 (97.0)	86.5 (85.0)	97.5 (99.0)
BELGIUM	92.7 (85.0)	98.9 (97.0)	90.7 (85.0)	98.4 (99.0)
DENMARK	84.6 (85.0)	98.9 (97.0)	84.9 (85.0)	98.1 (99.0)
FINLAND	88.0 (80.0)	98.9 (95.0)	83.5 (80.0)	96.3 (95.0)
FRANCE	91.2 (85.0)	99.1 (97.0)	87.3 (85.0)	97.2 (99.0)
GERMANY	93.7 (85.0)	99.4 (97.0)	89.6 (85.0)	97.8 (99.0)
ICELAND	56.6 (80.0)	93.2 (95.0)	69.2 (80.0)	92.3 (95.0)
IRELAND	88.3 (80.0)	97.4 (95.0)	78.5 (80.0)	96.2 (95.0)
ITALY	88.9 (85.0)	97.9 (97.0)	84.8 (85.0)	95.5 (99.0)
LUXEMBURG	92.6 (85.0)	98.9 (97.0)	87.7 (85.0)	97.9 (99.0)
NETHERLANDS	94.2 (85.0)	99.5 (97.0)	90.3 (85.0)	98.0 (99.0)
NORWAY	90.4 (80.0)	99.3 (95.0)	89.8 (80.0)	96.2 (95.0)
PORTUGAL	89.1 (80.0)	98.5 (95.0)	81.8 (80.0)	96.7 (95.0)
SPAIN	88.0 (85.0)	97.4 (97.0)	82.8 (85.0)	95.9 (99.0)
SWEDEN	89.2 (85.0)	98.9 (97.0)	89.0 (85.0)	98.0 (99.0)
SWITZERLAND	93.3 (85.0)	98.9 (97.0)	92.7 (85.0)	98.3 (99.0)
UN. KINGDOM	89.4 (85.0)	98.4 (97.0)	78.6 (85.0)	94.5 (99.0)

(H= Business Day of Deposit)

Source: International Post Corporation (IPC)

Table I4 - Quality Measurements of 1st Priority International Incoming Mail

Country	2004		2005	
	Measurements % (H+3) (Target Values according to MD %)	Measurements % (H+5) (Target Values according to MD %)	Μετρήσεις % (H+3) (Target Values according to MD %)	Μετρήσεις % (H+5) (Target Values according to MD %)
AUSTRIA	86.1 (85.0)	97.5 (97.0)	85.5 (85.0)	97.0 (99.0)
BELGIUM	86.3 (85.0)	97.0 (97.0)	86.1 (85.0)	97.0 (99.0)
DENMARK	86.4 (85.0)	97.2 (97.0)	82.0 (85.0)	92.9 (99.0)
FINLAND	80.1 (80.0)	97.2 (95.0)	81.3 (80.0)	95.5 (95.0)
FRANCE	74.7 (85.0)	94.9 (97.0)	80.6 (85.0)	96.2 (99.0)
GERMANY	87.4 (85.0)	97.8 (97.0)	87.0 (85.0)	97.3 (99.0)
ICELAND	65.4 (80.0)	95.0 (95.0)	63.9 (80.0)	92.2 (95.0)
IRELAND	60.6 (80.0)	89.6 (95.0)	47.1 (80.0)	84.3 (95.0)
ITALY	80.6 (85.0)	95.9 (97.0)	82.0 (85.0)	95.4 (99.0)
LUXEMBURG	84.6 (85.0)	97.2 (97.0)	85.8 (85.0)	95.9 (99.0)
NETHERLANDS	87.3 (85.0)	96.6 (97.0)	85.0 (85.0)	96.8 (99.0)
NORWAY	87.0 (80.0)	97.7 (95.0)	81.3 (80.0)	96.3 (95.0)
PORTUGAL	56.0 (80.0)	92.4 (95.0)	59.5 (80.0)	89.5 (95.0)
SPAIN	74.8 (85.0)	95.6 (97.0)	72.7 (85.0)	96.1 (99.0)
SWEDEN	82.7 (85.0)	97.2 (97.0)	80.1 (85.0)	94.5 (99.0)
SWITZERLAND	86.7 (85.0)	96.7 (97.0)	87.0 (85.0)	97.7 (99.0)
UN. KINGDOM	72.5 (85.0)	94.0 (97.0)	73.9 (85.0)	95.7 (99.0)

(H= Business Day of Deposit)

Source: International Post Corporation (IPC)

The conclusions regarding the quality of the provided services which result from the indicators of speed and reliability for the 1st Priority Incoming International Mail, are similar to the conclusions for the 1st Priority Outgoing International Mail. The speed indicator as well as the reliability indicator of Incoming International Mail record a reduction in the quality of the provided services in 2005 compared to 2004. Only half of the countries that participated on the measurements (8 countries in 17) achieved the target values for the quality of the speed indicator for the Incoming International Mail. On the contrary, the reliability indicator fell short of the target value, as the latter is defined in the relative MD, in most of the countries (15 countries in 17).

5.3. International Markets/Developments

The major developments in the European Postal Market are condensed in two Reports that were submitted to the European Committee within 2006 and related to:

- The effect of the full market liberalisation regime in Universal Postal Service that is expected to be in force from the 1st of January 2009, in accordance to the adoption of the new Postal Directive which is proposed by the European Committee.
- The major developments of the Postal Sector during the period 2004-2006.

The two Reports were carried out by international firms with an extensive experience in rendering consulting services to the European and international area.

5.3.1. The Development of Postal Market

As far as the development of Postal Market in the EU is concerned, the Report points out that the size of the market and the structure of the postal services has not been significantly altered through the last three-year period. The Postal Services contribute considerably to

the growth of the member states' economies and occupy a remarkable labour force. The letter post remains the major revenue source (60%) of the postal services' providers, while at the same time the distribution of parcels and of registered postal items encountered a significant increase during the last years.

In order to respond to the emerging competition in the provision of various postal services (particularly business to business parcels and registered postal items), the USP of member states upgrade their infrastructure and the processes of their internal operation, while at the same time the inflow of private capital to their assets renders them more competitive. It is worth noting that the aforementioned process entails the import of state of the art technologies in all production lines (collection, sorting, transport and delivery). Moreover, the observed increase in the density of access points (e.g. postal offices, agencies etc.) aims at the easier and friendlier provision of universal postal services to the end user. All the aforementioned actions contribute to ensuring the reliability and the high quality of postal services.

The admission of 10 new member states in the EU resulted to the harmonisation of their postal legislation with the European Directive. Simultaneously, many countries upgraded their postal legislation emphasizing mainly on cost accounting issues. The content of US, as well as the USP is a subject of an ongoing discussion in the member states. Specifically, the letter post and the distribution of parcels are the subject of US in all the countries of EU, while the distribution of direct mail (newspapers, magazines etc.) is included in the US of a limited number of member states. In countries such as Germany, Netherlands and the United Kingdom, the direct mail is either not included or in their process of exception from the US. Moreover, the former incumbent operator in Netherlands will not be the USP in the fully liberalised regime. Finally, it is pointed out that a fully liberalised regime is in force in the United

Kingdom from 01-01-2006, while it will be in force in Germany and Netherlands from 01-01-2008.

As far as the exclusive rights of USP are concerned, it is estimated that the 60% of letter post will be distributed under a fully liberalised regime till the end of 2007 according to the effective legislation. Moreover, the access to the Public Postal Network from alternative operators has been feasible only in two countries of EU (Germany, United Kingdom).

Additionally, issues such as the exception of USP of many member states from VAT charging on the services they provide as well as the special customs regulations that apply on items distributed on USP's responsibility are considered to be factors that affect the competition in the provision of postal services at a European level.

With regard to the cost accounting of US, it is considered that the majority of USP of member states does not submit sufficient data for the cost accounting audit (according to the relative European Directives) to the National Regulating Authorities (NRAs). In absence of cost/revenue information per service, the pricing of postal US according to cost-orientation is not feasible.

An important indicator of postal services' quality, apart from time measurements for the delivery of Cross Border Mail conducted by IPC, is the monitoring of the number and resolution of consumer complaints. In 2006 the majority of USPs of member states developed specialised systems of complaints management. Alternative providers of Postal Services have also adopted similar systems. It is worth mentioning that, the monitoring and the management of users complaints differ across countries while at the same time the publication of the relevant statistical data takes place only to a limited number of countries.

5.3.2. The Impact of 2009 Full Market Liberalization at the Provision of US

The respective survey using questionnaires and conducting personal interviews with all the participants (NRAs, USPs, Postal Services Providers and Consumers), aimed on one hand at recording the current status in the provision of US in the European area and on the other, at estimating the future trends in the postal market competition as well as evaluating the factors that will contribute to the safeguarding of US provision in a fully liberalised environment.

The main conclusions of the study were:

- The forthcoming liberalization of the postal market is expected to affect positively the quality and the content of US on one hand and to give a financial advantage to the provision of such services to the end users on the other.
- A potential aggressive tariff policy on behalf of the USP in order to prevent the entry of new players in the products and services of US in a fully liberalised market can be dealt successfully via the cost-oriented pricing of US services.
- The USP exclusive rights in the distribution of postal items, which today constitutes a way of USP compensation for the provision of US, might be potentially replaced through the provision of new more advanced postal services, which will meet consumers' needs. The requirement for a special US fund or governmental subsidies in order to cope with the cost of US will take place only in exceptional circumstances.
- In a fully liberalised environment the role of NRAs is crucial since they will assess whether the US provision to the end users satisfy certain criteria and at the same time bare the responsibility to intervene in case of a non-satisfactory US provision.

In every case, the transition period to a fully liberalised environment will reform the content and the

specifications of the US provision resulting to comparatively significant profits for the final user.

5.4. Controlling and Monitoring Actions of EETT

Number of Hearings	45
Fines	13
Recommendations	18
Exemptions	12
Other Sanctions / Decisions (Further Study)	2

Note: These are Hearings that were completed during the year.

It is noted that the Decisions on the Hearings of EETT are subject to juridical control according to the effective legislation.

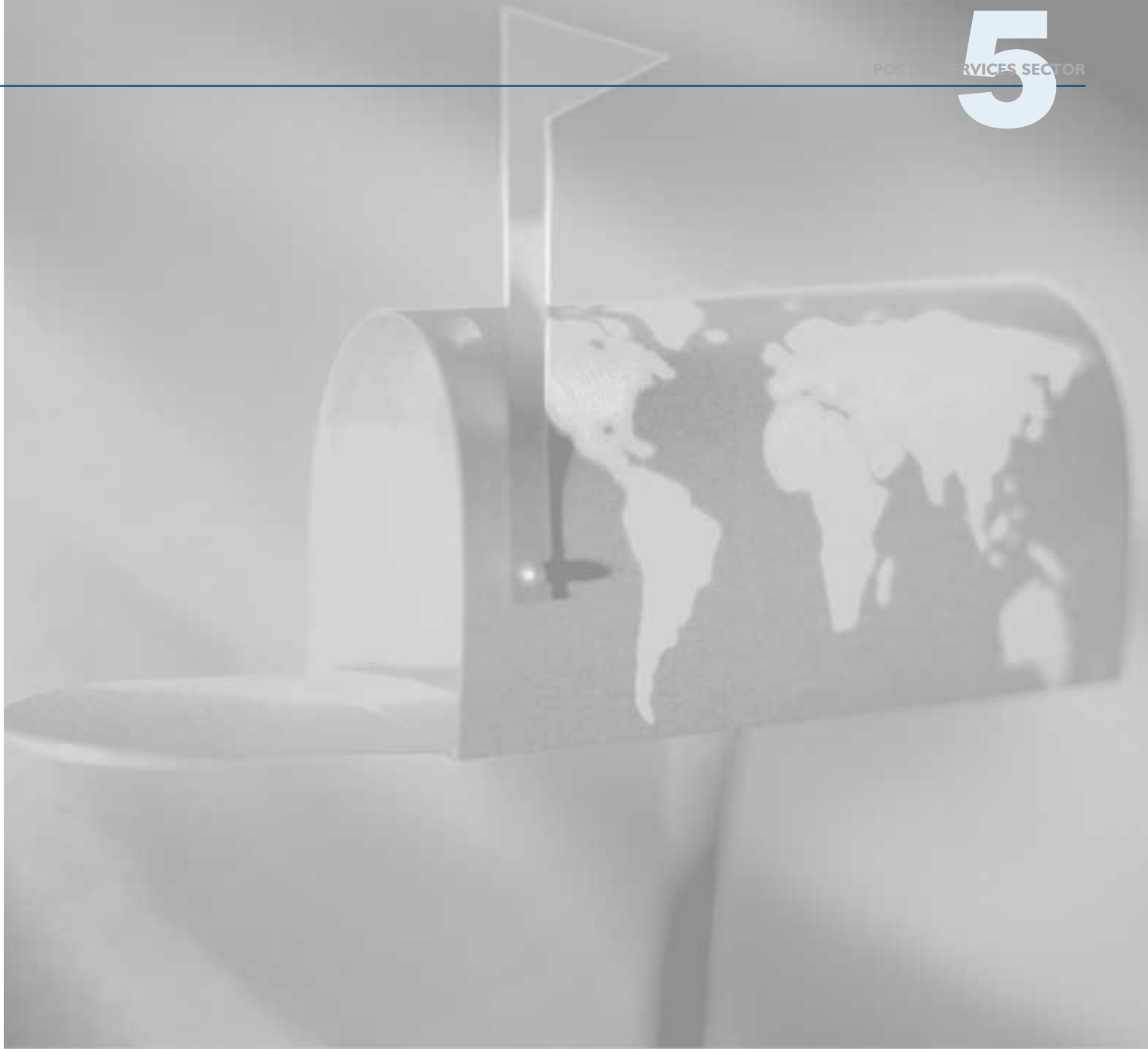
5.5. Goals

As far as the Postal Market is concerned, EETT has set the following goals for 2007:

- Continuing the quality measurements of US provided by Hellenic Post (ELTA) for the 1st Priority Domestic and International Mail in collaboration with an independent auditing firm

according to the current international quality standards.

- Reforming the existing legal framework of General Authorisations and Individual Licenses following a Public Consultation and recording the opinions of market participants, aiming at a further boost of sound entrepreneurship, the import of innovative and value added services and the improvement of cost-benefit relation of the providing services to the end users.
- Working out a study on the capability of a further liberalisation of the Greek Postal Market and its repercussions on the qualitative, economical and social characteristics of the US in view of the European Committee's proposal for the full liberalisation of the Postal Market as of the 1st of January 2009.
- Establishing informative round tables in the major Greek cities regarding the proper implementation of the effective Legislative Framework in daily practice and the crucial role of EETT as a NRA in the sector of Postal Services.
- Conducting scheduled and unscheduled audits in order to ensure the smooth market operation and locate those enterprises that do not comply with the Legislative Framework or furthermore operate without the required General Authorization or Individual License at the expense of the sound competition and the consumer.





European and International Partnerships

6. European and International Partnerships

The sector of international relations is a dynamic aspect of EETT activities. EETT goes along with international advancements in the Electronic Communications and Postal Services and furthermore it actively contributes in the shaping of regulatory developments at a European level.

EETT is in close cooperation with its European associates, the European Commission and other international organizations for issues of its competence. In this context, not only does EETT gain valuable know-how by exchanging views, but it also presents and promotes its work at European and international level.

6.1. European Union

6.1.1. European Regulators Group (ERG)

In 2006, EETT continued to actively participate in the works of ERG. Especially, in light of the incorporation of the European Regulatory Framework into the Greek legislation following the adoption of the new Law for the Electronic Communications (L.3431/2006), EETT intensified the process of the relevant markets' definition and analysis and their notification to the European Union (E.U.).

During 2006, the work that began in 2005 was pursued with the review of the European Regulatory Framework for Electronic Communications, as well as the review of the Commission Recommendation on relevant product and service markets within the Electronic Communications sector that are susceptible to ex ante regulation. The main points around which the work programme of ERG concentrated its activities for the year 2006 were the following:

- The Review of the Regulatory Framework.
 - The developments in technologies and markets.
 - The harmonization of the regulatory measures that are being implemented in the member states.
 - Practical implementation issues as to the above.
- ERG proceeded to further analyzing the developing markets and technologies, so that it is prepared to deal successfully with the constantly changing environment of Electronic Communications in Europe. Special emphasis was given to a) Broadband Internet, b) Voice over Internet Protocol (VoIP) and c) Next Generation Networks. There has also been progress on the work on International Roaming tariff transparency.
- Finally, in July, EETT hosted the meeting of the 25 Presidents of the ERG Group. Among other issues, discussions included the future of the ERG Group, the development by the NRAs of effective models of harmonization of the Electronic Communications regulatory legislation that is implemented in the member states, as well as the optimal utilization of acquired know-how. Finally, emphasis was given to the Group's relationship with the European Commission.

6.1.2. Independent Regulators Group (IRG)

Throughout 2006, EETT pursued its cooperation with its European partners aiming at further developing the unified Electronic Communications market. More specifically, EETT has contributed to the following IRG actions:

- Future development of IRG Group, in relation also to the European Commission. In 2006, special importance was attached to the development of IRG and mostly to the strengthening of its role as an efficient institutional body in relation to the E.U., through the harmonization of the implemented practices and the creation of a strengthened permanent IRG Secretariat.
- Review of the existing European Regulatory Framework. The "2006 Review" Working Group, which was formed in 2005 for the elaboration and coordination of IRG positions before they are

submitted to the E.U. continued its work in 2006, which includes the revision of the notification procedures according to Article 7 of the relevant Directive, the revision of the Universal Service (US) Directive, as well as the revision of the list of relevant markets.

- 5th Meeting between the NRAs of IRG Group and the respective Latin American REGULATEL Group.

6.1.3. Other Official Committees

In 2006, EETT continued to contribute to the shaping of European developments by participating in Groups of the European Commission and other organizations for issues that pertain to its competence. Such participations include, among others, the following: Communications Committee (COCOM), Electronic Communications Committee (ECC), Radio Spectrum Committee (RSC), Telecommunications Conformity Assessment and Market Surveillance Committee (TCAM), Administrative Cooperation (ADCO), Postal Directive Committee (PDC), Forum of European Supervisory Authorities for Electronic Signatures (FESA) and the European Conference of Postal and Telecommunications Administrations (CEPT).

6.1.4. Comité Européenne de Réglementation Postale (CERP)

EETT was invited - and started to participate in the 4th trimester of 2006- in the plenary meetings of CERP. CERP is a committee that was established within CEPT (European Conference of Postal and Telecommunications Administrations). CEPT has been established in 1959, originally by 19 countries. Today it numbers 47 member states and covers almost the entire geographic region of Europe. CEPT's field of competences includes commercial, administrative and regulatory issues, as well as technical standardization issues. In 1992, CEPT established three committees,

CERP for postal issues and two committees for Electronic Communications issues: ERC (European Radiocommunications Committee) and ECTRA (European Committee for Regulatory Telecommunications Affairs), which have been merged into ECC.

CERP held its first meeting in November 1992. Since then, it has been convened usually every six months and operates through Working Groups and Committees. The Working Groups prepare studies in specific topics related to their competence and activities, the results of which are submitted to the Committees for further actions. The main issues that were discussed and presented at the 35th CERP plenary meeting, in which EETT participated, were the following:

- Comments on the results of the two studies that were presented on behalf of the E.U. in 2006 regarding the total liberalization of the European Postal Market as of 01-01-2009. Other discussion topics included the studies carried out by the European Commission as regards the effects of the forthcoming Postal Directive to the EU member states.
- Reference to the anticipated increase in the demand of Postal Services as part of the broader development and promotion of commercial sales via direct mail.
- Discussion about the possibility of reformation of the Universal Postal Union (UPU), following the expressed desire of its members through a research that had been carried out.
- Presentations of the results of CERP Working Groups' studies and researches.
- Presentations of the commercial practices used by private postal service providers, who have registered significant results in the states where they are conducting their operations, in their effort to penetrate the relevant market.

As a conclusion, CERP is a forum of fertile deliberations and exchange of views among Ministry representatives,

NRAs and Postal Market associates. The participation of EETT in CERP is expected to strengthen its role and voice within the community of European Postal Market Regulators. At the same time, it will offer the possibility to EETT staff to have a regular contact with and participate in the deliberations that take place in the various CERP Working Groups.

6.1.5. 12th Report of the European Commission

The 12th Report of the European Commission presents the major developments in the market of the Electronic Communications in Europe during 2006 and highlights the critical points that require the attention of the member states.

As regards the course of the market at European level, the incorporation of all national legislations into the new European regulatory framework has been completed. At the same time, the first phase of the market analysis has been concluded in most of the countries. However, any conclusions as to the effectiveness of the procedure, are deemed premature, given the fact that the specialization and practical application of the regulatory measures is still under way. The Report notes significant delays in the specialization of the regulatory measures and substantial variations in the regulatory measures chosen in the different countries. Furthermore, the Report notes that approximately 50 cases are referred to the European Court for issues relating to the application of the regulatory framework by the member states. Fixed telephony shows a continuous decreasing trend (as in 2005), but continues to be the main source of revenues for the providers of fixed network services. The Carrier Selection/Pre-Selection constitute important structural elements of competition but there are problems due to the win back campaigns that are being conducted. The report makes reference to the handling of the above issue by the regulatory authorities of Greece and Portugal. As far as the mobile telephony is concerned,

growth is steady, but at a lower rate compared to 2005. A crucial issue for the Commission is the high international roaming charges. Finally, the broadband market registers high growth rates (about 8%) and shows signs of robust competition, with the alternative providers holding almost 50% of the retail access market.

In the case of Greece, the Report welcomes the incorporation of the European regulatory framework for the Electronic Communications into the Greek legislation, through which the uncertainty that prevailed in the market is now decreasing. The Report also mentions the significant efforts that EETT made in order to make up for the lost ground. Due to these efforts, EETT had managed to notify 16 out of the 18 markets⁵⁸ by September 2006, despite the fact that until the beginning of 2006 it did not have such competences.

Also, emphasis is given to the delay in the incorporation of the regulatory framework into the national legislation of the abovementioned market 18 (Broadcasting), an issue for which Greece has been referred to the European Court.

In the Report, the Commission expresses its persistent concern for the significant delays in the hearing of appeals, something that engenders uncertainty in the market. But at the same time it expresses the hope that the relevant provisions of the new national law will contribute positively to this end.

In the fixed telephony sector, the most important issue seems to be OTE's delay in submitting the data for the cost audit. As to the mobile telephony, Greece's position with regard to mobile termination rates has improved significantly, as the gap between Greece and E.U.'s average has decreased in 2006⁵⁹.

In the broadband market, Greece remains a follower

⁵⁸ Up to the end of 2006, 17 markets have been notified. The notification of the International Roaming Market was completed on December 2006 and has not been taken under consideration in the 12th Report. The entrusting of competence for Market 18 (Broadband Market) remains in suspense.

⁵⁹ In 2006, termination rates in Greece have totaled to 12.42 Eurocents/min compared to an EU average of 11.4. The rates in 2005 were 14.86 Eurocents/min and 12.79 Eurocents/min, respectively.

among the E.U. member states. However, there are positive prospects for development. The Local Loop Unbundling (LLU) shows accelerating growth, mostly due to the significant increase of physical collocations. In addition, according to the data provided by the Report, the cost of full and shared access to the local loop is among the lowest in the E.U.⁶⁰.

Finally, the Report underlines the need to address the problems that the alternative operators face with regard to the rights of way.

6.2. International Partnerships

EETT was particularly active at international level through the participation in conferences and meetings and the establishment of bilateral partnerships. Specifically, in late 2006, the initial preparations took place for the forthcoming signing of Memorandums of Understanding with the Regulatory Authorities of Italy and Egypt.

In November 2006, the President of EETT, Professor Nikitas Alexandridis, had a meeting with Ms Viviane Reding, the European Commissioner responsible for Information Society and Media. They discussed and exchanged views about issues that relate to EETT's activities regarding regulation and competition in the

market of Electronic Communications in Greece, as well as the implementation of the European Commission Directives in the relevant markets. Furthermore, EETT's President updated the Commissioner on the progress of EETT's actions, laying special emphasis on its regulatory interventions in the market of broadband services.

Finally, during the last quarter of 2006, foundations were laid for yet another international partnership. Seeing that within EETT's competence competition issues that pertain to Electronic Communications fall, EETT will henceforth participate in the European Competition Network (ECN).

6.3. Goals

At international level, EETT has set the following goals for 2007:

- Active participation in the shaping of regulatory developments in the Electronic Communications sector, mostly through the ERG Group.
- Continuous cooperation with the European Commission on issues of competence.
- Stronger presence in regional conferences and bilateral partnerships (forthcoming signing of Memorandums of Understanding with the Regulatory Authorities of Italy and Egypt).

⁶⁰ For full access the average monthly cost in Greece is 9.9 Euros compared to 11.51 Euros in the E.U. (4th less expensive country). In shared access the average monthly cost in Greece is 3.6 Euros as opposed to 4.52 Euros in the E.U. (6th less expensive country).

6





EETT: Organizational Development

7. EETT: Organizational Development

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

7.1. Internal Organization

7.1.1. Organizational Structure

EETT consists of:

- A nine-member Committee, which consists of the President, the Vice-President for Electronic Communications, the Vice-President for Postal Services and the Members. The President and the Vice Presidents are selected and appointed by the Ministerial Council, upon the proposal of the

Minister of Transport & Communications and opinion by the Parliament's Committee on Institutions and Transparency. The rest of the members of EETT are appointed by the Minister of Transport and Communications. As members of EETT are elected persons of recognized reputation, who have gained a wider social acceptance and are distinguished for their scientific background and professional competence in the technical, financial or legal sector.

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

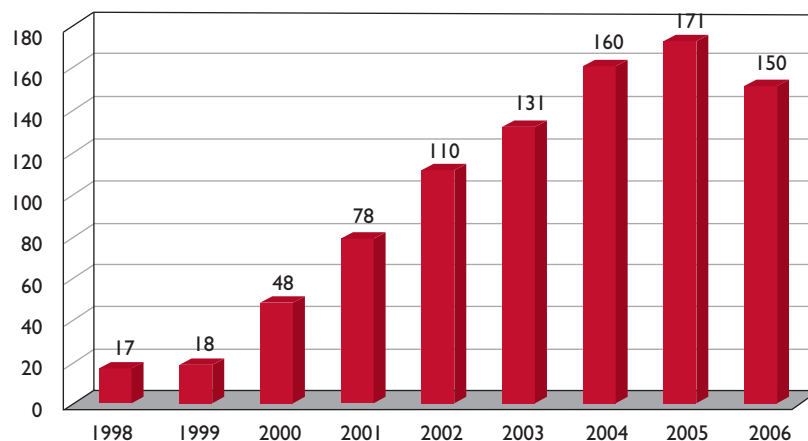
The organizational structure⁶¹ of EETT is presented in detail on the Organizational Chart (see page 78).

7.1.2. Human Resources

At the end of 2006, EETT's personnel added up to 150 employees, compared to 171 at the end of 2005. Out of the above, 133 are employed on a permanent basis, 15

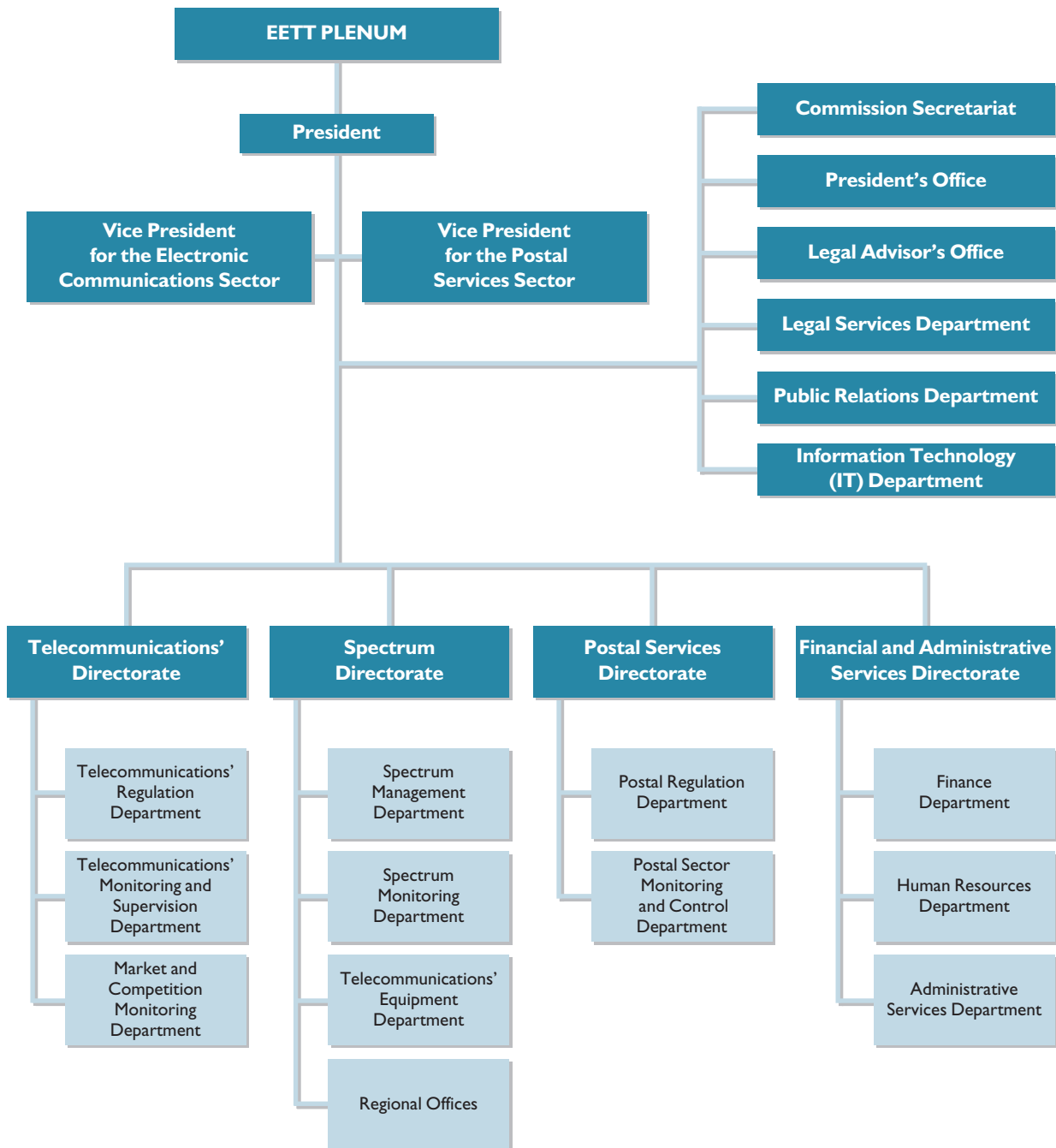
Chart 4

Evolution of EETT's Human Resources, 1998-2006



⁶¹ PD 387/2002

Organizational Chart



are External Associates-Members of Working Groups and 2 are seconded policemen serving at EETT for the needs of the spectrum monitoring department. The evolution of EETT's human resources is presented in Chart 4 and the number of employees per personnel category in Table 15.

In 2006, a contest was held for the hiring of 16 Experts, who are expected to be integrated into EETT's workforce during the 1st semester of 2007.

The educational level of EETT's human resources is represented in Chart 5 (page 80). As part of its effort to further train and qualify its employees according to their job specialization, EETT carries out a broad education programme consisting of training seminars, participation in international conferences etc.

7.1.3. Implementation of Health and Safety Services

With a view to guaranteeing the safety and health of its workforce, EETT has started offering in 2006 the services of a health and safety inspector and of a work doctor, in cooperation with an External Service of Health and Safety for the Employees.

This initiative is part of EETT's effort to constantly improve the working environment and working conditions of its human resources. Emphasis is given to issues concerning the prevention of work accidents, the arrangement of offices, the safety inspection of the premises and technical installations, as well as to advising the employees on issues of health, ergonomics and work hygiene.

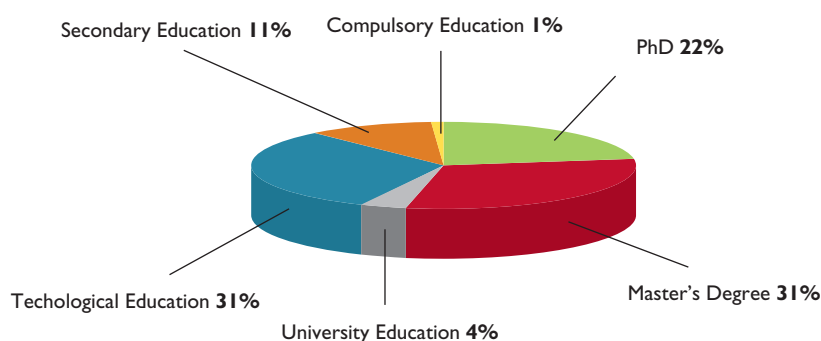
Table 15 - Number of Employees per Personnel Category, 1998-2006

Personnel Category	31-12-98	31-12-99	31-12-00	31-12-01	31-12-02	31-12-03	31-12-04	31-12-05	31-12-06
Scientific Experts	-	-	26	37	56	69	64	70	69
Permanent Personnel	0	0	7	13	27	36	39	60	64
Categories	University	-	-	3	4	4	4	6	6
	Technological	-	-	6	6	17	25	42	42
	Secondary	-	-	1	4	6	6	11	15
	Compulsory	-	-	-	-	-	1	1	1
Secondees	1	1	2	6	6	4	3	3	2
Assigned	12	13	1	2	2	2	0	0	0
Temporary Personnel	0	0	0	0	0	0	34	0	0
Members of working groups *	4	4	12	20	19	20	20	38	15
TOTAL	17	18	48	78	110	131	160	171	150

* Employees working together in Working Groups.

Chart 5

Educational Level of EETT's Personnel, 31-12-2006



7.2. Information Society Operational Programme

During 2006, EETT continued implementing its projects coming under the framework of the Information Society Operational Programme (OPIS), which is part of the third Community Support Framework (CSF III).

In total, 10 OPIS projects have been introduced, which consist of 15 sub-projects. Out of them, 11 have already been completed, 1 is expected to be completed during the first semester of 2007 and 3 are at implementation stage, which will be concluded by the end of 2008. In 2006, the sub-project regarding the provision of network equipment was completed. Also, the sub-project concerning the Integrated Information System (IIS) entered its implementation stage. Moreover, the training of EETT's employees on issues of regulatory authorities, state-of-the-art technologies and the use of information systems was integrated into the OPIS.

Within 2006, two amending Technical Bulletins have

been submitted to the OPIS, while an application for the integration of one more project is at elaboration process.

7.3. Integrated Information System (IIS)

In 2005, EETT held a tender for the selection of a contractor for the implementation of EETT's IIS. In March 2006, the tender process was completed, the contract was signed and in September of the same year the project entered its implementation stage.

The IIS of EETT consists of hardware and software. The scope of the project covers the supply and installation of hardware, the design, the development and the installation of software, as well as the maintenance and support of their operation.

The project aims at:

- Improving the productivity/ efficiency of the personnel.
- Reinforcing the prospects of horizontal cooperation

among administrative units.

- Upgrading the information mechanisms and possibilities.
- Improving the services that EETT provides to the citizens and the organizations with which it converses.

The implementation of the project, as it evolves, focuses on covering the IT needs of EETT, on the automation of corporate operations and procedures and on the development of a structured communication of the external environment. More specifically, it includes 4 sub-systems:

- Document and Process Management: it will support EETT's operations through filing procedures, document management and business process management.
- Support of Business Operations: it will provide the necessary functionality for the support of the main business activities of EETT, such as the maintenance of a database containing all companies, licensing, scare resources management, management of consumers and companies issues etc.
- Financial Management and Human Resources Management.
- Support of Communication with the External Environment: it will include the services directory management, mass communication automation, web site administration and Internet services.

The development of the IIS is a very important and complex project and will have immediate results in upgrading EETT's operation and improving the quality of the provided services.

7.4. Web Site

In 2006, EETT upgraded its web site in terms of template, structure and functionality. The new web site of EETT is aesthetically designed and user friendly, it

makes navigation simpler and guides users depending on their capacity (e.g. operators, consumers, press representatives, etc). Users have the possibility to register themselves and receive newsletters via e-mail. Furthermore, it has a strong search functionality of its content.

As part of this upgrade, EETT enriched its web site by adding new sections and sub-sections, such as "Advice for Consumers", "Information for Operators", "The Greek Market", "International Roaming", "Number Assignment", "Popular Issues", "Agenda", "Procurement Tenders", "International Relations", "Speeches/Presentations", "EETT's President Interviews/ Articles" etc.

Through this upgrade, EETT web site becomes a user friendly means of communication and updated information, a tool of constructive interaction between EETT and the organizations with which it cooperates and the public. This is confirmed by the remarkable number of visits (more than 177,000) that the new web site has received since June, when it was first launched, until the year's end. The largest traffic was registered in the sections "Electronic Communications", "Advice for Consumers", "Regulatory Framework/ EETT Decisions" and "Press Releases-Announcements". Among the most visited sub-sections in the Electronic Communications section were "Telecommunications" and "Domain Names".

7.5. Goals

In order to fulfill its role, EETT has to be extrovert, dynamic, flexible and at the same time efficient. Moreover, it has to guarantee a working environment capable of attracting and preserving a high quality workforce. Hence, the goals that EETT has set for 2007 are the following:

-
- Improve its internal organization and operation by satisfying its needs in high level human resources and by training its employees through the implementation of a broad education programme.
 - Upgrade its operation and improve its efficiency with regards to the provision of services to citizens and to the organizations with which it cooperates through the implementation and operation of the IIS.
 - Expand and upgrade its network services.
 - Recommence procedures through the Hellenic Public Real Estate Corporation in order to cover the housing needs of EETT headquarters and upgrade the building infrastructures at the offices in Thessaloniki.

7.6. Financial Statements

HELLENIC TELECOMMUNICATIONS & POST COMMISSION							BALANCE SHEET AS OF 31 st DECEMBER 2006 12 th FISCAL YEAR (1 st JANUARY - 31 st DECEMBER 2006 (AMOUNTS IN EUROS))		
ASSETS		Amounts for the Period ended 2006			Amounts for the Period ended 2005			CAPITAL & LIABILITIES	
		Acquisition Value	Depreciation	Net Value	Acquisition Value	Depreciation	Net Value	Amounts for the Period ended 2006	Amounts for the Period ended 2005
B. PREOPERATING COST									
1. Start up expenses		465,538.60	211,186.75	254,351.85	465,538.60	118,078.99	347,459.61		
4. Other preoperating expenses (S/W)		2,127,751.25	1,883,816.73	243,934.52	2,067,848.39	1,252,162.63	815,685.76	293,470.29	293,470.29
		<u>2,593,289.85</u>	<u>2,095,003.48</u>	<u>498,286.37</u>	<u>2,533,386.99</u>	<u>1,370,241.62</u>	<u>1,163,145.37</u>		
C. FIXED ASSETS									
II. Tangible Assets									
5. Vehicles		176,424.05	134,760.88	41,663.17	176,424.05	115,609.24	60,814.81		
6. Furniture & fixtures		11,686,672.03	7,204,720.40	4,481,951.63	11,223,737.23	4,953,421.25	6,270,315.98		
7. Payments on account & construction in progress		164,530.80	0.00	164,530.80	164,530.80	0.00	164,530.80	15,430.67	15,430.67
Total Tangible Assets (C II)		<u>12,027,626.88</u>	<u>7,339,481.28</u>	<u>4,688,145.60</u>	<u>11,564,692.08</u>	<u>5,069,030.49</u>	<u>6,495,661.59</u>	2,869,132.23	5,453,417.41
III. Participations & other									
Long Term Receivables									
7. Other long-term receivables				205,287.60			165,117.00	3,178,033.19	5,762,318.37
Total Fixed Assets (CII + CIII)				<u>4,893,433.20</u>			<u>6,660,778.59</u>		
D. CURRENT ASSETS									
I. Inventories									
4. Raw and auxiliary materials, consumables and spare parts				254,536.62			277,540.00		
II. Receivables									
1. Trade debtors		1,393,125.88		953,336.46			1,223,008.57		
Less: Provisions (44.11)		439,789.42		862,096.82			8,381,130.84		
11. Sundry debtors				9,620,433.28			9,604,139.41		
IV. Cash & Deposits									
1. Cash in hand				3,137.60			1,332.33		
2. Time & Sight deposits				116,234,595.55			204,529,942.10		
				116,237,733.15			204,531,274.65		
Total Current Assets (DI + DII + DIV)				<u>126,112,703.05</u>			<u>214,412,954.06</u>		
E. TRANSITIONAL ASSET ACCOUNTS									
1. Deferred expenses				1,876.16			1,878.36		
2. Deffered income				611,359.69			1,081,095.32		
				<u>613,235.85</u>			<u>1,082,973.68</u>		
TOTAL ASSETS (B+C+D+E)				<u>132,117,658.47</u>			<u>223,319,851.70</u>		
MEMO ACCOUNTS (DEBIT)									
2. Guarantees & Liens				20,505,230.47			23,398,313.96		
4. Tax free reserve from accounting differences				48,871,579.73			97,323,886.73		
				<u>69,376,810.20</u>			<u>120,722,200.69</u>		
MEMO ACCOUNTS (CREDIT)									
2. Guarantees & Liens				20,505,230.47			23,398,313.96		
4. Tax free reserve from accounting differences				48,871,579.73			97,323,886.73		
				<u>69,376,810.20</u>			<u>120,722,200.69</u>		
PROVISIONS FOR LOSSES & EXPENSES									
2. Other provisions				561,159.43			0.00		
LIABILITIES									
II. Current Liabilities									
1. Suppliers				779,442.41			761,599.45		
4. Customers' advances				128,734.72			141,439.82		
5. Taxes and duties payable				231,405.79			186,387.55		
6. Social security withholdings				160,760.70			150,467.22		
11. Sundry creditors				22,666,016.34			100,353.86		
Total Liabilities (CII)				<u>23,966,359.96</u>			<u>1,340,247.90</u>		
D. TRANSITIONAL LIABILITIES ACCOUNTS									
1. Revenues cashed in advance				8,640,460.93			8,287,113.26		
2. Accrued expenses				82,031.95			8,783.68		
				<u>8,722,492.88</u>			<u>8,295,896.94</u>		
TOTAL LIABILITIES & OWNERS' EQUITY (A+B+C+D)				<u>132,117,658.47</u>			<u>223,319,851.70</u>		
OWNERS' EQUITY									
IV. Capital Reserves									
2. Charter stipulated reserves								293,470.29	293,470.29
3. Special reserves								15,430.67	15,430.67
Capital expenditure								2,869,132.23	5,453,417.41
Special and extra reserves (3rd EFP)								3,178,033.19	5,762,318.37
V. Profits Carried Forward									
Profits carried forward								62,243,741.59	207,921,388.49
from previous year 2005								33,445,871.42	0.00
for current year 2006 (Law 3431/2006)								35,899,613.01	207,921,388.49
Total Equity (AV+ AV)				<u>98,867,646.2</u>			<u>213,683,706.86</u>		

NOTE: In the Balance Account "Sundry Debtors" are included receivables amounting in total to 8,640,460.93 euros from fines imposed by EETT decisions to obliged parties, due to violations of the legislation in force during the current and previous accounting periods. They will be collected in accordance with the procedure under the Public Revenues Collection Code and will be registered in the respective revenues of accounting periods they will be collected. The amounts from the aforementioned fines are in the transit accounts of the liabilities "Revenues cashed in advance".

INCOME STATEMENT (PROFIT & LOSS ACCOUNT) FOR THE YEAR ENDED 31 st DECEMBER 2006 (1 st JANUARY - 31 st DECEMBER 2006)						PROFIT DISTRIBUTION TABLE	
		Amounts for Period ended 31-12-2006		Amounts for Period ended 31-12-2005			
I. OPERATING RESULTS							
Turnover (Fees received)		36,620,501.80		34,072,084.79			
Less: Cost of services provided		13,098,222.84		10,826,724.87			
Gross operating results		23,522,278.96		23,245,359.92			
Plus: Other operating income		8,130,460.06		1,398,997.6			
Total		31,652,739.02		24,644,357.52			
Less: 1. Administrative expenses		3,102,893.64		2,686,892.55			
Sum total of Operating results		28,549,845.48		21,957,474.97			
Plus: 4. Credit interest and related income		3,708,089.71		4,040,486.28			
Less: 5. Interest, charges & related expenses		2,334.64		2,000.47			
		<u>3,705,755.07</u>		<u>4,038,485.81</u>			
Total Operating Results		32,255,600.55		25,995,960.78			
II. PLUS: EXTRAORDINARY RESULTS							
1. Extraordinary and non operating income		1,632,085.04		55,356.07			
3. Income from previous periods		0.00		0.00			
Less: 1. Extraordinary & non operating expenses		1,577.31		2,146.09			
3. Prior period expenses		447.44		312.46			
4. Provisions for nonrecurring expenses		439,789.42		441,814.17			
Operating and extraordinary results		<u>441,814.17</u>		<u>1,190,270.87</u>			
Total depreciation on Fixed Assets		3,117,011.43		33,445,871.42			
Less: Depreciation incorporated to operating costs		0.00		0.00			
		<u>3,117,011.43</u>		<u>2,944,417.78</u>			
NET RESULT (PROFIT) BEFORE TAX		<u>33,445,871.42</u>		<u>26,048,858.30</u>			

THE ACCOUNTABLE FINANCIAL ADMINISTRATOR EETT CHAIRMAN		Maroussi, 4 April 2007 HEAD OF THE DIRECTORATE FOR FINANCIAL & ADMINISTRATIVE SERVICES EETT VICE PRESIDENT		THE HEAD OF THE EETT ACCOUNTING DEPARTMENT	
NIKITAS ALEXANDRIDIS I.D. N°: AB 064557		THEODOROS DRAVILLAS I.D. N°: AT 1 076616		GIORGOS ORFANOS I.D. N°: AT 2 521075	ECONOMIC CHAMBER OF GREECE CLASS A REG N° 0003970

REPORT OF CERTIFIED AUDITOR - ACCOUNTANT
To the "Hellenic Telecommunications and Post Commission"

Report on Financial Statements. We have audited the above Financial Statements of the Hellenic Telecommunications and Post Commission which consist of the Balance Sheet as of December 31st 2006, the Income Statement (Profit & Loss Account) and the Profit Distribution Table for the period ended on 31st December 2006.

Administration Responsibility on Financial Statements. The Administration of Hellenic Telecommunications and Post Commission has the responsibility for conducting and presenting the Financial Statements in accordance with the Accounting Standards prescribed by Greek Legislation. Such a responsibility includes planning, application and maintenance of an internal Financial Statements control system free from essential inaccuracy, caused by fraud or error. This responsibility also includes the selection and implementation of appropriate accounting policies and the conduct of accounting estimations that are reasonable for the circumstances.

Certified Auditors' Responsibility. Our responsibility is the expression of an opinion on the above Financial Statements, according to our auditing data. Our audit was conducted in accordance with the Greek Auditing Standards, which are in line with the International Auditing Standards. These Accounting Standards require our conformity with the rules of business ethics. The planning and the conduct of our audit aim at the legitimate guarantee that the Financial Statements are free from substantial inaccuracy.

The audit entails the conduct of procedures for collecting the audit records which is relevant to the amounts and the information that are included in the Financial Statements. The choice of procedures lies on the supervisor's judgement and entail the estimation of the substantial risk for the inaccuracy of the Financial Statements, due to fraud or error. For this risk estimation, the auditor takes into account the internal control system which is relevant to the formation and the reasonable presentation of the Financial Statements, in order to outline audit procedures for the circumstances and not to express an opinion about the effectiveness of the internal control system of the Hellenic Telecommunications and Post Commission. The audit also entails the appreciation for the suitability of the applied accounting policies and the reasonability of the Administrator's estimations, as well as the appreciation of the total presentation of the Financial Statements. We believe that the auditing data that we have assembled are sufficient and suitable for the foundation of our opinion.

Opinion. In our opinion, the above Financial Statements reflect reasonably and under any substantial opinion the economic situation of the Hellenic Telecommunications and Post Commission as of December 31st 2006 and its financial performance for the fiscal year ended on that date, in accordance with the Accounting Standards prescribed by Greek Legislation.

Report on other legal and regulatory issues. The content of EETT's Presidential proposal to the Plenary regarding the Annual Report is consistent with the above Financial Statements.

Maroussi, 10 April 2007



The Certified Auditor - Accountant
LEONIDAS S.P. KAWVADIAS
ICPA REG. NO. 10711



Appendices

8. Appendices

I. Greek Legislative – Regulatory Framework (01-01-2006 until 31-12-2006)

Law, Presidential Decrees and other Legislative Acts

L.3431/2006, GG Issue 13/A/3-2-06 “Electronic Communications and other provisions”

II. Regulatory Texts on the Basis of Legislative Authorization in Virtue of L.3431/2006

- Decision of EETT 381/1/2006 “Results of the Cost Estimating Audit of the Hellenic Telecommunications Organization (OTE SA), of the Year 2005 (with accountant elements of 2003), for the wholesale services under regulation”, GG Issue 681/B/31-05-2006.
- Decision of EETT 381/2/2006 “Decision making on the proposal of OTE concerning the tariffs of voice telephony, leased lines, interconnection and local loop unbundling”, GG Issue 558/B/04-05-2006.
- Decision of EETT 388/012/2006 “Definition of the national Wholesale market for the provision of (Full and Shared) Unbundled Access in Metallic Loops and Sub-Loops for the purpose of providing broadband and voice services, determination of the companies with Significant Power in the said market and of their obligations”, GG Issue 932/B/18-7-2006.
- Decision of EETT 389/051/2006 “Definition of the national wholesale broadband access services market, determination of the companies with Significant Power in the said market and of their obligations”, GG Issue 891/B/12-7-2006.
- Decision of EETT 401/14/2006 “Decision making regarding the definition of the wholesale markets on Leased Lines (markets no 13, 14 of the Recommendation of the European Committee), determination of the companies with Significant Power in the said markets and of their obligations”, GG Issue 1419/26-9-2006.
- Decision of EETT 406/34/2006 “Definition of the wholesale interconnection markets on Public Fixed Networks, determination of the companies with Significant Power in the said markets and of their obligations”, GG Issue 1669/B/14-11-2006.
- Decision of EETT 406/33/2006 “Definition of the retail market on leased lines, determination of the companies with Significant Power in the said market and of their obligations”, GG Issue 1660/B/13-11-2006.
- Decision of EETT 411/017/2006 “Definition of the retail market on the access in the public telephony network in fixed position through PSTN and BRA-ISDN connections for domestic and non domestic clients, determination of the companies with Significant Power in the said market and of their obligations”, GG Issue 1873/B/28-12-2006.
- Decision of EETT 412/021/2006 “Definition of the retail markets on publicly available urban and national telephone services that are provided in fixed position, determination of the companies with Significant Power in the said market and of their obligations”, GG Issue 1900/B/29-12-2006.
- Decision of EETT 399/49/2006 “Postponement of the application of the retaining fees on the calls from fixed numbers of OTE to mobile numbers and from fixed numbers of OTE to geographic and non

-
- geographic numbers of other fixed networks, as these fees were amended by the Decision of EETT 381/2/3-4-2006 “Decision making on the proposal of OTE concerning the tariffs of voice telephony, leased lines, interconnection and local loop unbundling (GG Issue 558/B/2006)”, GG Issue 1329/B/14-09-2006.
- Decision of EETT 407/3/2006 “Postponement of the application of the retaining fees on calls from fixed numbers of OTE to mobile numbers and from fixed numbers of OTE to geographic numbers and non geographic numbers of other fixed networks, as these fees were amended by the Decision of EETT 381/2/3-4-2006 “Decision making on the proposal of OTE concerning the tariffs of voice telephony, leased lines, interconnection and local loop unbundling (GG Issue 558/B/2006)”, GG Issue 1607/B/01-11-2006.
 - Decision of EETT 410/36/2006 “Retaining fees on the calls from fixed numbers of OTE to geographic and non geographic numbers of other fixed networks, according to the Decision 381/2/3-4-2005 of EETT “Decision making on the proposal of OTE concerning the tariffs of voice telephony, leased lines, interconnection and local loop unbundling (GG Issue 558/B/2006)”, GG Issue 1790/B/08-12-2006.
 - Decision of EETT 392/017/2006 “Definition of the Market on the Termination of Voice Calls to Individual Mobile Communications Networks, determination of the companies with Significant Power in the said market and of their obligations, GG Issue 1016/B/28-7-2006.
 - Decision of EETT 410/035/2006 “Definition and Analysis of the Wholesale Access and Call Start on Mobile Telephony Networks market” GG Issue 1790/B/08-12-2006.
 - Decision of EETT 348/1/2006 “Subordination of Antenna Constructions to the article I par. 2 el. Z of L. 2801/2000”, GG Issue 739/B/20-06-2006.
 - Decision of EETT 399/34/2006 “Regulation on the Terms of Use of Individual Radiofrequencies or Zones of Radiofrequencies”, GG Issue 1456/B/03-10-2006.
 - Decision of EETT 390/1/2006 “Regulation on the Use and Granting of Rights of Use of Radiofrequencies under a General Authorisation Regime for the Provision of Electronic Communications Networks or/and Services”, GG Issue 750/B/21-06-2006.
 - Decision of EETT 406/22/2006 “Regulation on Licenses for Antenna Mast Constructions according to Law 3431/2006”, GG Issue 1666/B/14-11-2006.

- Decision of EETT 366/48/2005 “Modification and Coding in a single text of the Regulation on the Introduction of Carrier Pre-selection in the Greek market”, GG Issue 22/B/17-01-2006.
 - Decision of EETT 375/40/2006 “Approval of the submitted by the Liable Provider for the facilitation of Carrier Pre-Selection (OTE SA) of the standardized texts of subscribers’ applications for the activation, deactivation, annulation of the application, change of carrier pre-selection scheme and change of Pre-Selected Provider”, GG Issue 362/B/27-03-2006.
 - Decision of EETT 375/41/2006 “Approval of the submitted by the Liable Provider for the facilitation of Carrier Pre-Selection (OTE SA) standardized text – letter informing the subscriber of the activation of Carrier Pre-Selection on a Pre-Selected Provider”, GG Issue 362/B/27-03-2006.
 - Decision of EETT 394/21/2006 “Postponement of the application of number three (3) Carrier Pre-Selection scheme (all the calls), as it is provided for in article 5 par. 1 of the Decision of EETT 366/48/8-12-2005 “Modification and coding in a single text of the Regulation on the Introduction of Carrier Pre-Selection in the Greek Market”, GG Issue 22/B/17-01-2006.
 - Decision of EETT 367/46/2005 “Definition of the Liable Parties for the Provision of the Universal Service”, GG Issue 22/B/17-01-2006.
 - Decision of EETT 375/10/2006 “Regulation on the procedure of public consultation”, GG Issue 314/B/16-3-2006.
 - Decision of EETT 390/3/2006 “Regulation on General Licenses”, GG Issue 748/B/21-06-2006.
- III. European Regulatory Framework on the Electronic Communications Sector**
- Commission Decision 2006/771/EC, of 9th November 2006, on harmonization of the radio spectrum for use by short range devices.
 - Commission Decision 2006/804/EC of 23rd November 2006, on harmonization of the radio spectrum for radio frequency identification (RFID) devices operating in the ultra high frequency (UHF) band.
 - Directive 2006/24/EC of the European Parliament and of the Council of March 15th 2006 on the retention of data generated or processed in connection with the provision of publicly available electronic communications services or of public communications networks and amending Directive 2002/58/EC.

IV. Glossary

TERM	EXPLANATION
Accompanying Courier Note (ACN)	A form attached to the postal item containing identification details.
Active Subscribers	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.).
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 Providers (CSP)	Individuals or legal entities or other carriers issuing certificates or providing other services, with respect to the Electronic Signatures.
Charter of Obligations to Consumers (COC)	The undertakings providing postal services under a General Authorization must 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.

Co-migling	Refers to the capability of collocation of a Telecommunication Provider's equipment in a space within OTE's Local Exchanges, where the related equipment of OTE is hosted. In the case of co-migling, in the framework of OTE's legal obligations, maintenance and operation of equipment takes place by OTE.
Comité Européenne de Réglementation Postale (CERP)	Committee founded in 1992 in the frame of CEPT (European Conference of Postal and Telecommunication Administration) and deals with postal issues.
Comprehensive Directory	The directory including fixed and mobile telephony numbers of all Providers' subscribers.
Dependent Stations (in satellite services)	Earth stations whose access to the space part is performed under the control and surveillance of an infrastructure station.
Dialers	Dialers are software that can be transmitted through the Internet and be installed in the computer of the consumer. This software changes the settings of the consumer's modem from one internet address to another. Usually, the change is from the common number of the ISP that the consumer uses, to a high cost number, either of a 90XXXXXXXX series or a number abroad (00XXXXXXXX).
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.

Distant Collocation	Form of collocation according to which in the framework of OTE's legal obligations, a Telecommunication Provider obtains access to OTE sources through connecting cables.
Domain Names	An alphanumeric element which individualizes a computer connected to a network or group of computers connected to a network, according to the principles of the Internet Domain Name System.
Earth Infrastructure Stations (in satellite services)	Earth stations with control and monitoring devices, constituting the cores for the provision of satellite services. Examples of this category are radio-television broadcasting stations, HUB stations in VSAT TDM/TDMA network, etc.
European Conference of Postal and Telecommunication Administration (CEPT)	It was founded in 1959 by 19 countries. Today it counts 47 member states and covers almost all the geographical area of Europe. Its activities include commercial, administrative, regulatory and technical standardization issues.
European Regulators Group (ERG)	The ERG consists of the 25 EU NRAs, and 8 observer NRAs (Bulgaria, Switzerland, Iceland, Croatia, Lichtenstein, Norway, Romania and Turkey). ERG aims at encouraging collaboration and coordination between NRAs and the European Commission, in order to promote the development of the internal market for electronic communications of networks and services. In parallel it seeks consistent implementation by all member states of the provisions laid down in the Directives of the NRF.
Fixed Service (Radiocommunications)	Radiocommunications Services between specified fixed points.
Fly Away	Easily transported equipment, which allows rapid satellite connection in distant areas for data, sound and image transmission.
Geographic Numbers	The numbers whose prefix denotes the geographic location of the number holder.

Granting of Frequency Right	Authorization provided to a person already holding an Individual License, 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 License.
Independent Regulators Group (IRG)	The IRG was established in 1997, as an informal group of European NRAs, aiming at the exchange of views, experiences and practices among its members concerning issues of common regulatory interest. Taking into account the composition of the official group of ERG by European Union in 2002, IRG currently plays a symbolic role.
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.
Interconnection link	The connection between a switching centre (node) of OTE and a switching centre (node) of telecommunications provider network, which enables interconnection.
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.
International Incoming Traffic	The total traffic terminating to a Provider network, originating from foreign providers.
International Outgoing Traffic	The total traffic originating from a Provider network, terminating to foreign providers.
Link	The total of telecommunications equipment required for implementing the connection between two points of a telecommunications network.

Local Loop	The circuit that connects the terminating point of each subscriber with the main distributor in the OTE Local Exchange.
Mobile Telephony	Radio service between Mobile Stations and Land Stations or between Mobile Stations.
Multimedia Service	Multimedia Services include high rated value added services, like services of live chat, reception of information in the form of recorded messages, chat with more than 2 participants, special content provision through the Internet (Audiotex, Videotex and Premium Rate SMS - PSMS etc.).
National Incoming Traffic	The total traffic terminating to a Provider network, originating from the networks of other domestic fixed or mobile telephony Providers.
National Numbering Plan	The total of routes which define the structure of numbers used by electronic service providers for the provision of services to the users.
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 a national level.
National Reference Database for Number Portability (NRDNP)	Database that 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.
Next Generation Networks	Packet switching networks, that provide broadband telecommunication services based on multiple access and core network technologies (which are able to provide high levels of quality). Furthermore, these technologies give continuous

	coverage of services to the user and access to more than one service providers simultaneously (if desired).
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.
Physical Collocation	Form of collocation according to which OTE in the framework of its legal obligations constructs a special space in its Local Exchanges which is provided to Telecommunication Providers for the installation of equipment.
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 Mobile Radio (PMR)	The term is used to describe professional radio networks of land mobile service used to meet communication needs of various professional users, as well as emergency services.
Radio Aids	Telecommunication systems of Civil Aviation Authority providing the pilots with information on the command of the aircraft.
Radio and Telecommunications Terminal Equipment (RTTE)	See Radio, Telecommunications Terminal Equipment
Radiocommunications Service	A service including transfer, transmission and/ or reception of radio waves for special telecommunications purposes.
Radio Equipment	Equipment which includes transmitter and/ or receiver and provides communication through radio waves with the use of spectrum.

Reference Interconnection Offer (RIO)	The reference document used as a basis for the Interconnection contract among OTE and other Providers. This document is released by OTE and approved by EETT.
Reference Unbundling Offer (RUO)	The reference document used as a basis for the contract signed for LLU provision by OTE to other providers. This document is released by OTE and approved by EETT.
Satellite Services	Services whose provision is based in whole or in part on the installation and operation of earth satellite stations networks. 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).
Service Free of Charge	Call for which the caller is not charged.
Shared Access Service	A call the cost of which is shared between caller and called, given that the charge does not exceed the maximum normal charge of a national call.
Significant Market Power (SMP)	An enterprise is considered to hold a Significant Market Power (dominant position), when it is holding financial power which allows it to operate to a great extent independently from the competition, the customers, and the consumers.
Special Postal Items Track and Trace System (SPITTS)	Information system for the tracking and tracing of postal items.
Telecommunications Terminal Equipment	Equipment intended to be connected directly or indirectly by any means to telecommunications networks (mobile telephony networks, public analog and digital telephony networks and data networks) used for the provision of publicly available telecommunications services.
Telemetry	The use of telecommunications for the automatic

	indication or recording of measurements, performed at a distance from the measurement instrument.
Universal Service - US (in the postal services sector)	The right granted to postal services users, regardless of their location in the Greek territory, to permanently and affordably enjoy special quality postal services. The Universal Postal Service includes: a) the collection, transport, sorting and distribution of postal items up to 2 kg, b) the collection, transport, sorting and distribution of postal parcels up to 20kg, c) services of registered mail and deliveries with declared value. The US includes both national and transboundary services.
Universal Service - US (in the electronic communications sector)	The provision of a fixed set of basic telecommunications services available to all citizens of Greece, regardless of their geographic location, at affordable prices.
Universal Service Provider – USP	The carrier assigned by the Greek State with the (in the sector of postal services) obligation to ensure provision of the Universal Postal Service. Hellenic Post (ELTA) is the current USP.
Very Small Aperture Terminals (VSAT)	Station terminals with small aperture antenna.
Voice over Internet Protocol (VoIP)	General term used to describe the transfer of voice through data networks using packet switching instead of circuit switching used in classic telephony. This technology allows making of telephone calls through the Internet.
Wireless Fidelity (Wi-Fi)	Wireless local network, which uses radio frequencies to transmit and receive data, based on the IEEE 802.11 standards group.
World Interoperability for Microwave Access (Wi-MAX)	Wireless network, which uses radio frequencies to transmit and receive data, based on the IEEE 802.16 standards group.

V. Abbreviations

ACN	Accompanying Courier Note
ADCO	Administrative Cooperation Group
ADSL	Asymmetric Digital Subscriber Line
AET	Approval of Environmental Terms
AIA	Athens International Airport
APSC	Protection of the Secrecy of Communications
CAA	Civil Aviation Authority
CEPT	Conference of European Postal & Telecommunications
CERP	Comité Européenne de Réglementation Postale
COC	Charter of Obligations to Consumers
COCOM	Communications Committee
CSF	Community Support Framework
CSP	Certification Service Providers
CSS	Consumer Service Sector
DCS	Digital Communication System
ECC	Electronic Communication Committee
ECN	European Competition Network
ECTRA	European Committee for Regulatory Telecommunications Affairs
EDV	Express Delivery Voucher
EETT	Hellenic Telecommunications and Post Commission
ELTA	Hellenic Post
ERG	European Regulators Group
EU	European Union
FB	Fire Brigade
FDC/CCA	Fully Distributed Cost/Current Cost Accounting
FESA	Forum of European Supervisory Authorities for Electronic Signatures
FMS	Fixed Monitoring Stations
GG	Government Gazette
GSM	Global System for Mobile Communications
HNMS	Hellenic National Metereological Service
IIS	Integrated Information System
IPC	International Post Corporation/International Postal Union
IRG	Independent Regulators Group
ISPs	Internet Service Providers
JMD	Joint Ministerial Decision
KPIs	Key Performance Indicators
LLU	Local Loop Unbundled
LRAIC/CCA	Long Run Average Incremental Cost/Current Cost Accounting
MD	Ministerial Decision
MIS	Multimedia Information Services
MMS	Mobile Monitoring Stations

MTC	Ministry of Transport and Communications
MTP	Mobile Telephony Providers
NFAC	National First Aid Centre
NGO	Non Governmental Organizations
NNP	National Numeration Plan
NRA	National Regulatory Authorities
NRDBNP	National Reference Data Base on Number Portability
NRFR	National Radio Frequencies Registry
NRTC	National Radio Television Council
NSMMS	National Spectrum Management and Monitoring System
OLOs	Other Local Operators
OPIS	Operational Program for the Information Society
OTA	Local self-Government Organizations
OTE	Hellenic Telecommunications Organization
PCM-4	Pulse Code Modulation for 4 Channels
PDC	Postal Directive Committee
PDPA	Personal Data Protection Authority
PIBs	Principles of Implementation and Best Practice
PMR	Private Mobile Radio
PPC	Public Power Corporation
QoS	Quality of Service
RFID	Radio Frequency Identification
RIO	Reference Interconnection Offer
RLAN	Radio Local Area Networks
RSC	Radio Spectrum Committee
RUO	Reference Unbundling Offer
RTTE	Radio and Telecommunication Terminal Equipment
SLAs	Service Level Agreements
SMP	Significant Market Power
SNG	Satelite News Gathering
SPITTS	Special Postal Items Track and Trace System
SRDs	Short Range Devices
TCAM	Telecommunications Conformity Assessment and Market Surveillance Committee
TRIS	Technical Regulations Information System
UHF	Ultra High Frequency
UMTS	Universal Mobile Telecommunications System
UPU	Universal Postal Union
US	Universal Service
USP	Universal Service Provider
VoIP	Voice over IP
VSAT	Very Small Aperture Terminals
WAS/RLAN	Wireless Access Systems / including Radio LANs
Wi-Fi	Wireless Fidelity

Wi-MAX World Interoperability for Microwave Access
WLR Wholesale Live Rental

VI. Tables and Charts Map

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