



**EETT**

HELLENIC TELECOMMUNICATIONS & POST COMMISSION

# 2019

**A N N U A L   R E P O R T**  
SUMMARY OF ACTIONS



# Annual Report 2019

## Summary of actions



# Summary of actions

In 2019, EETT implemented multi-level strategic objectives, undertaking actions and initiatives at a regulatory, supervisory and monitoring level in the fields of electronic communications, radio frequency spectrum and postal services. In particular, EETT focused, inter alia, on protecting users' rights, strengthening competition and creating a regulatory framework that ensures the proper operation of markets as well as taking on a central role in its presence at international level. The most important actions of EETT are summarized as follows.

## Consumer issues

Consumers are at the center of EETT's actions and the protection of their rights is one of its strategic objectives. In 2019, the Consumer Service Sector handled, in total, approximately 15,000 written requests/complaints and, on a daily basis, about 70 telephone inquiries/requests. In the context of actions related to consumer awareness, EETT issued recommendations regarding the final stage of the provisions deriving from the General Authorizations Regulation and created a new section on its website, providing information on radio equipment issues. EETT also published in English its online Guides on postal services which provide information to users, individuals and businesses respectively. In addition, EETT informed postal services users about the available online tools for finding and comparing postal services offered.

## Electronic communications sector

*Market analysis based on the European regulatory framework:*

- *Leased Lines markets:* In the context of the 3<sup>rd</sup> round of market analysis, the draft measures regarding the Leased Lines markets, at both retail and wholesale level, were notified by EETT to the European Commission, the Body of European Regulators for Electronic Communications (BEREC) and the National Regulatory Authorities (NRAs) of the other member states.
- *Interconnection markets:* For the market of wholesale calls originating from the public telephone

network provided at a fixed location, the initial conclusion of EETT is that it should no longer be subject to ex-ante regulation. Also, the market of wholesale call termination on individual public telephone networks, provided at a fixed location, consists of individual markets per network and each provider should be determined to have Significant Market Power (SMP) in the wholesale provision of call termination to end-users on its fixed public telephone network.

*Bottom-up LRIC+ model:* A national public consultation was conducted about the model used for the calculation of access prices of new generation and copper networks. A second national public consultation followed, on the revised model, based on the comments from the first round.

*Open Internet:* The Open Internet National Regulation imposes new measures on the provision of Internet access services, further developing the provisions of Regulation (EU) 2015/2120, based on BEREC Guidelines. EETT amended the Open Internet National Regulation, especially regarding the procedure for examining customers' complaints.

*Reference offers for access services:*

- *Wholesale local access:* The final measure of OTE's reference offer was approved. The reference offer will include a list of Key Performance Indicators (KPIs), which will allow for comparisons between OTE's retail access point services and those provided to third parties, requesting access. Also, OTE modified the annexes of the reference offer regarding the fulfillment of its obligation to publish a reference offer in accordance with the specifications of Virtually Partially Unbundled (VPU) Light and VPU Fiber to the Home (FTTH) services.
- *Wholesale central access:* OTE's reference offer was approved, after the conduct of a public consultation. OTE had already notified EETT regarding its intention to terminate the provision of 2Mbps and 4Mbps speeds provided through wholesale central access services ARYS, VPU ADSL and VPU Light ADSL.

*General Authorizations Regulation:* The 3<sup>rd</sup> and final stage of the amendments of the Regulation came into force, regarding, inter alia, the definition of the upper bound fee for the early termination of a fixed-term contract, the provision of the automatic termination of the contract, in case of excessive charges, and the easy access to the terms and conditions of the contract and the price catalogue.

*Rural networks:*

- *Reference offers:* A number of amendments to the already approved by EETT reference offers of the rural operators "OTE RURAL NORTH" and "OTE RURAL SOUTH" were approved, regarding the improvement of the provision of the access services. Also, the reference offer of "RURAL CONNECT" was modified, regarding the provision of new services for long-term leasing of infrastructure (Indefeasible Right of Use-IRU) for 30 years.
- *Price audit:* The wholesale access prices, submitted by the above operators, were approved by EETT.

*Audit of OTE's bundled offers:* More than 270 bundled offers were examined for margin squeeze and 45 related EETT's decisions were issued.

*Cost-accounting audit - Accounting separation:* The wholesale prices of the regulated products and services were issued, after the completion of the cost-accounting audit for 2019, based on actual data of 2017.

*Termination rates of mobile networks:* The Bottom-up LRIC+ model for the calculation of the termination rates of mobile networks was updated.

*Universal Service:* A public consultation was conducted regarding EETT's amendment proposal on the Joint Ministerial Decision about the allocation procedure of the Universal Service Net Cost and the subsequent compensation of the Universal Service Provider. In addition, the amendment proposal was submitted to the Ministry of Digital Policy, Telecommunications and Media<sup>1</sup>.

*Number portability:* During 2019, there was an increase of 10.61%, compared to 2018. Also 12 audits took place at the providers' premises as well as at the call center companies with which they co-

operate for the promotion/sale of their services. In the majority of the audits, there was proper compliance with the Number Portability Regulation.

*Domain names:* 473,735 domain names with the extension [.gr] and [.ελ] were assigned, corresponding to an approximate increase of 3%, compared to 2018.

*Maintenance and upgrade of HYPERION:* The public statistics presented in the System for Performance Evaluation of Broadband Connection Services, HYPERION, were reformed.

*National Numbering Plan:* A proposal for the amendment of the National Numbering Plan was put into public consultation.

*Premium Rate Services:* Audits were carried out by EETT, following a considerable number of complaints, regarding the arbitrary registration of consumers in Premium Rate Services (PRS) which resulted in undesirable charges. In addition, fines and recommendations were imposed on 4 PRS providers, following hearings held in 2018. Also, a public consultation was conducted about the amendment of the Code of Conduct for PRS, aiming at enhancing consumer protection from arbitrary registrations.

*Audits and hearings:*

- *Network infrastructure:* 48 audits and autopsies were carried out on the providers' network infrastructure, in order to identify possible malfunctions and assure the uninterrupted provision of new generation and Local Loop services.
- *Audits regarding compliance with the regulatory framework:* 232 audits were conducted on retail shops of electronic communications providers, regarding fulfilment of their obligations towards consumers, arising from the Regulations about General Authorizations and number portability as well as the Code of Conduct for the provision of electronic communications services.
- *Third party services:* Audits were conducted on retail shops of the electronic communications providers and call center companies they cooperate with, in order to identify possible deviations between the price elements submitted to the Price Observatory for telecommunications and postal services, Pricoscope, and those that are actually offered to the customers.

1. From 08-07-2019 and onwards: Ministry of Digital Governance.

- *Hearings:* 55 hearings were held regarding infringements of the electronic communications legislation.

## Radio frequency spectrum sector

*Actions for the preparation of spectrum allocation for the deployment of 5<sup>th</sup> generation (5G) networks:*

- The preparation, that started in 2018, regarding the allocation process of radio frequency bands for the deployment of 5G networks, continued in 2019. In particular, EETT studied topics of special interest, such as terms and obligations, spectrum blocks starting prices, infrastructure sharing issues, extended coverage of “white” areas, incentives for new-entrants and access of vertical markets to 5G spectrum.
- A public consultation was conducted in order to get feedback from the market on the use of the 1500MHz band for mobile broadband services.
- Existing radio frequency rights of use for 5G trials were extended and new rights were granted to operators.

*New regulatory framework for the licensing of antenna constructions:* EETT updated the Regulation on licensing antenna constructions, taking into account all new provisions of the new legislative framework adapted during 2019.

*Granting of radio frequency rights of use:* EETT granted and/or modified radio frequency rights of use for fixed services, Private Mobile Radio (PMR) networks, terrestrial satellite station services as well as Satellite News Gathering (SNG).

*Antenna construction licensing:* EETT granted new licences for land-based antenna constructions, amended a part of already licensed ones and issued acts for the subsumption of land-based antenna constructions under the scope of Environmental Commitment Standards.

*Radio equipment issues:* EETT published a new technical rule which includes the radio interfaces for mobile earth service radio equipment.

*Audits and hearings:*

- EETT carried out ex-officio inspections, regarding the proper use of the radio frequency spectrum and investigated requests/complaints on issues, inter alia, concerning interference in the frequencies of mobile base stations, the operation of PMR and amateur radio stations, interference and information requests, legality

testing, compliance with broadcasting technical standards, illegal broadcasting and illegal installations/facilities of radio/television stations and antennas as well as operations of shutting down illegal emissions.

- Priority was given on wireless networks related to the protection of human life as well as of public and national security.
- EETT conducted audits on radio equipment devices, in order to verify their compliance with the new regulatory framework, introduced by the Presidential Decree 98/2017.
- EETT held 400 hearings and imposed 330 fines mostly for antenna constructions of fixed and mobile networks as well as broadcasting and radio equipment issues.

## Postal services sector

*Verification of the Universal Service Net Cost:* EETT submitted to the Minister of Digital Governance reports for the years 2017-2018, regarding the verification of the Universal Service Provider’s Net Cost.

*Evaluation of the Universal Service invoices:* The invoices submitted by the Universal Service Provider were evaluated and approved, subject to conditions.

*Universal Service quality measurement:* With regard to the Universal Service quality measurement, the speed index for 2019 was estimated at 76.3%, while the reliability index was 96.4%. The two indicators improved slightly, in relation to 2018. It should be noted that the Universal Service Provider was below the quality targets for the years 2018 and 2019.

*Reforming of the Universal Service content:* A study was carried out in order to review the content and quality requirements of the Universal Service.

*Approval of cluster mailboxes installation:* The installation of 1,540 cluster mailboxes was approved, in order to serve 1,434 households in 34 areas and 4 municipalities with incomplete numbering or without unique street names.

*Data collection and publication regarding postal services providers:* EETT continued the collection of quantitative and qualitative data regarding the activity of registered postal services providers.

*Investigation of complaints regarding infringements of free competition law:* EETT examined the complaints submitted by postal services providers

against the Universal Service Provider (ELTA), concerning the eventual adoption of abusive practices for the exclusion of competitors, in breach of free competition law.

*Implementation of the new Regulation on cross-border parcel delivery:* A Regulation on cross-border parcel delivery services was adopted, pursuant to Regulation (EU) 2018/644 of the European Parliament and of the Council, which is part of the actions in the context of the single digital market in the European Union (EU).

*Audits and hearings:*

- 129 audits were carried out on the premises of postal services providers throughout the Greek territory, in order to detect the degree of compliance with the legal framework and the terms of their licence.
- Audits were carried out on non-licensed enterprises, in order to establish any illegal postal services activity.
- 83 hearings were held and 55 fines were imposed.

## International cooperations

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In 2019, EETT took over the Vice Presidency of BEREC and the European Regulators Group for Postal Services (ERGP). In this context, the perspectives and future developments at European level in the fields of electronic communications and postal services were looked at as well as relevant strategic guidelines and necessary actions were defined, in order to strengthen competition for the benefit of users. At the same time, EETT cooperated with and played a central role in international and European bodies in the field of electronic communications, radio frequency spectrum and postal services.

With the above actions, EETT participates in the shaping of regulatory developments, while promoting its positions and acquiring the necessary know-how, in order to respond to modern challenges.





2019

# Important data

474,000

assignments of domain names

consumers' complaints for  
electronic communications, postal  
services and antenna constructions

15,500

3,000

providers' requests carried out  
regarding antenna constructions

cluster mailboxes approved for  
installation in 34 areas

1,540

1,500

granted radio frequency rights of use  
for fixed services

antenna constructions inspections

480

460

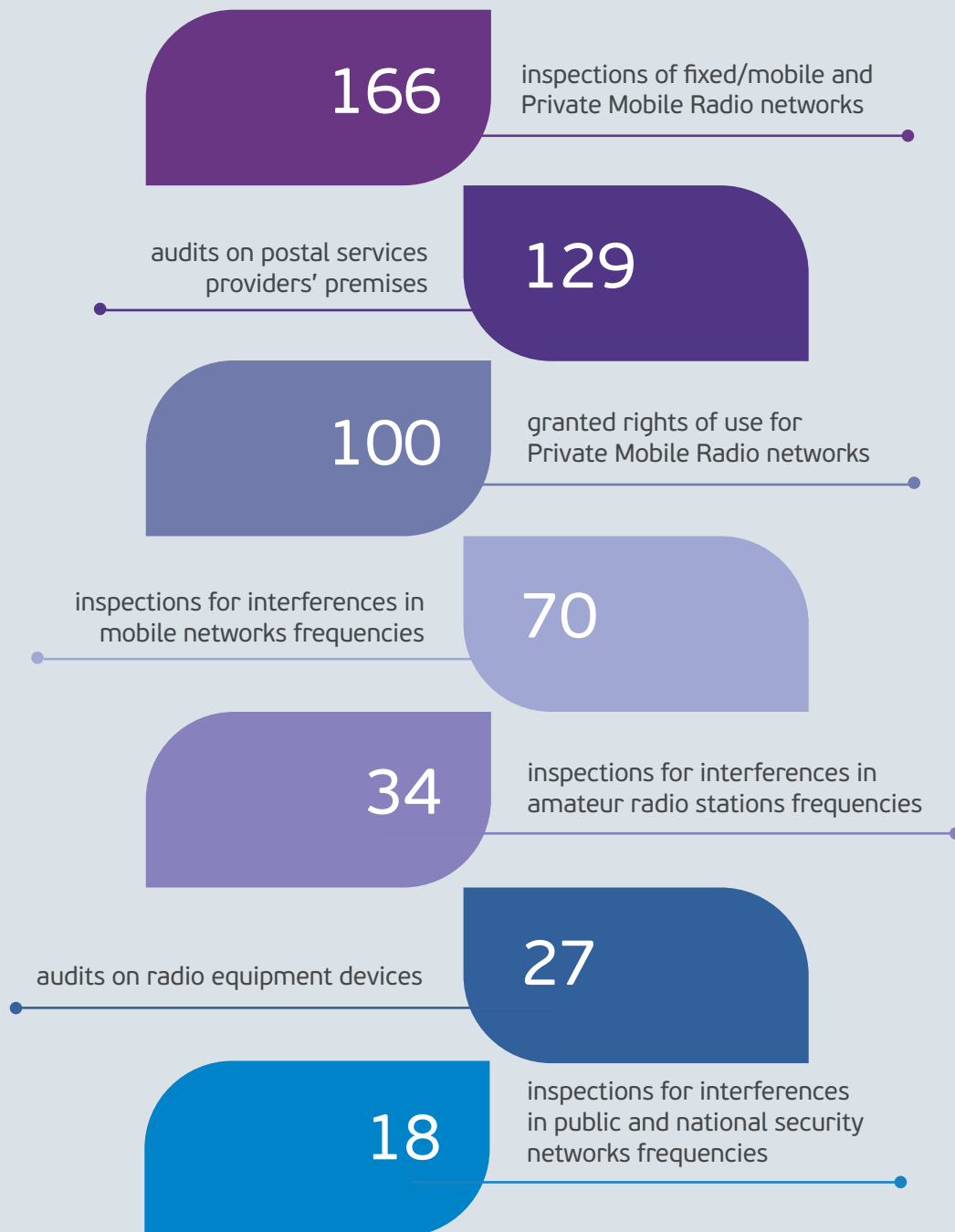
radio/television stations inspections

inspections and autopsies on premises  
and retail shops of electronic  
communications providers

300

221

postal services providers' requests carried  
out regarding authorization issues



**985**  
EETT decisions,  
in total

**538**  
hearings

**387**  
decisions  
imposing fines



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