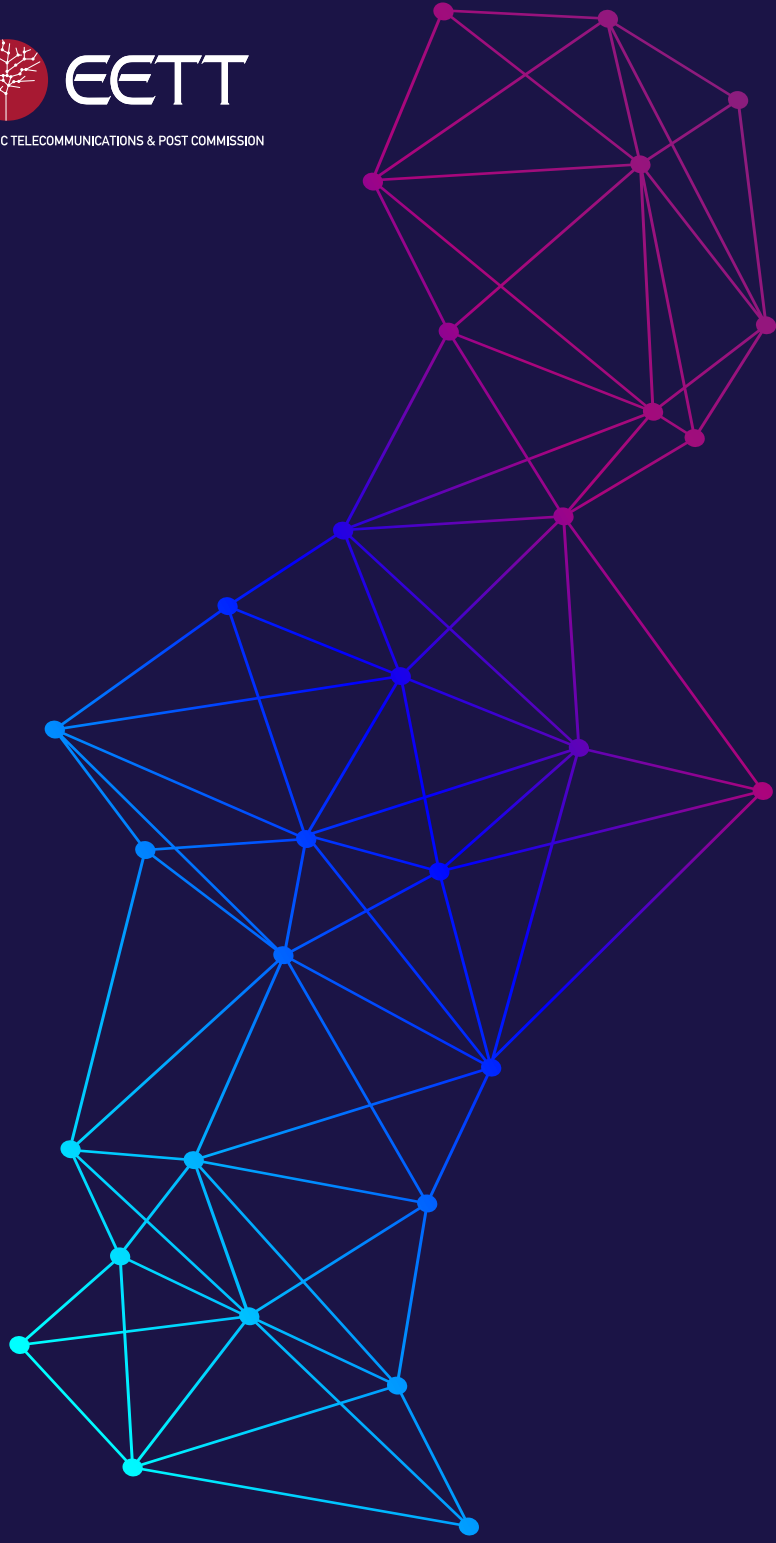


2020

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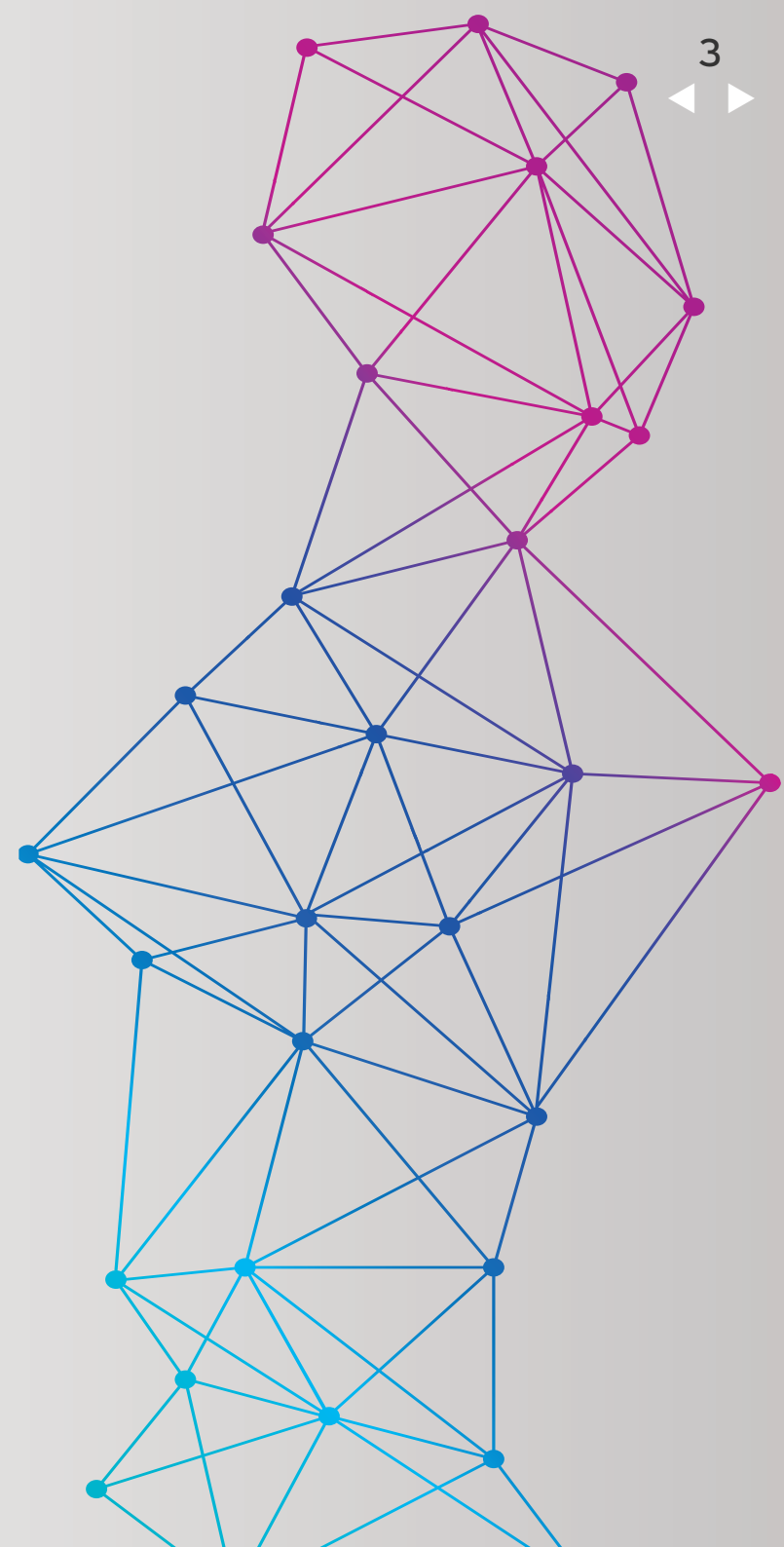


ANNUAL REPORT 2021

Summary of actions

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About EETT

The Hellenic Telecommunications and Post Commission (EETT) is an independent authority with administrative and financial autonomy. It acts as the National Regulatory Authority (NRA) in matters of provision of services and networks for electronic communications, related facilities and services, and postal services: Its operation is governed by articles 6 to 11 of Law 4070 (Government Gazette 82/A/2012).

EETT regulates, supervises and monitors:

- The electronic communications market, which is primarily dominated by companies/providers of fixed and/or mobile telephony, wireless communications and Internet.
- The use of the radio spectrum, having, inter alia, the competence to grant, revoke or restrict the rights of use for radio frequencies and the licensing of antenna constructions, as well as matters relating to the conditions for placing on the market and use of radio equipment.

- The postal market, in which postal services providers operate.

EETT also operates as competition commission, with all relevant powers and monitoring rights, for the implementation of the national and European legislation regarding competition in the above markets. In this context, EETT ensures the smooth operation of the markets, effectively addressing the risks of distorting competition and defending users' rights.

Important milestones in the operation and development of EETT

1992

The Hellenic Telecommunications Committee (EET) is established by Law 2075/1992 as an independent state authority with competences in the field of radio spectrum, the under liberalization market of telecommunications services and activities, including the granting of licences and also the task to ensure compliance with competition rules.

1995

EET starts operating.

1998

EET is assigned the additional competence for the supervision and regulation of the postal services market by Law 2668/1998, which determines the organization and operation of the relevant market. The Authority is renamed to Hellenic Telecommunications and Post Commission (EETT).

2000

Law 2867/2000 strengthens the regulatory, supervisory and monitoring role of EETT in the electronic communications market, now fully liberalized after the abolition of OTE's exclusive rights and legal monopoly on the fixed (voice) telephony and fixed telephone network.

2003

EETT's competences in the postal market are strengthened by amendment of Law 2668/1998. The new framework is defined by Law 3185/2003 on the gradual opening of the postal market to competition and the strengthening of EETT's responsibilities in this market.

2006

The framework for the provision of electronic communications networks and services and related facilities is set out, and EETT's competences are expanded. The new framework is defined by Law 3431/2006 on electronic communications, which incorporates more recent European regulations.

2020

Law 4727/2020 incorporates the European Electronic Communications Code, as established with Directive (EU) 2018/1972 into the Greek legislation. The Code updates and replaces the existing package of directives regarding the regulation of the sector. On this basis, Law 4727/2012 replaces most of Law 4070/2012.

2012

EETT's competences are extended, as provided for by Laws 4070/2012 and 4053/2012, regarding the responsibility of managing the radio spectrum for terrestrial digital broadcasting services and ensuring greater transparency and efficiency, in matters such as the licensing of antenna constructions, market analysis and consumer protection.

Plenary composition

EETT is governed by a nine-member Committee, consisting of:

- The President and two Vice Presidents, who are responsible for the sectors of electronic communications and postal services respectively. The President and the Vice Presidents are selected and appointed by the Council of Ministers upon a proposal of the Minister of Digital Governance and following the opinion of the Special Permanent Committee on Institutions and Transparency of the Hellenic Parliament.
- Six Members, who are appointed by the Minister of Digital Governance.

The Plenary's term of office is four years and appointing a member for more than two terms, whether consecutive or not, is not allowed. Persons of recognized standing and high-level scientific expertise, academic qualifications and extensive professional experience are selected for the Plenary. In exercising their tasks, they enjoy personal and operational independence.

The composition of the Plenary in 2021 was the following.

EETT Plenary



**Professor
Konstantinos Masselos**
President



**Associate Professor
Dimitris Varoutas**
Vice President of electronic
communications



Dr Spyros Pantelis
Vice President of postal services



**Professor
Antonios Gasteratos**
Member



Dr Nikolaos Kapsalis
Member



Dr Argiro Magkanioti
Member



Eleni Gousiou
Member



**Associate Professor
Grigorios Koulouras**
Member



**Professor
Aristeia Sinanioti-Maroudi**
Member

Summary of actions

Plenary meetings

In 2021 the EETT Plenary adopted a total of 878 decisions within 47 meetings. The decisions concerned the following issues:

- Licensing.
- Regulation and supervision/monitoring of the sectors of electronic communications, radio spectrum and postal services.
- Competition issues.
- Hearings of providers on issues related to their operation.
- EETT administrative matters.

The agenda and decisions are published on the EETT website. Moreover, decisions relating to regulatory acts are published in the Official Journal of the Hellenic Republic (Government Gazette). Also decisions are posted on the governmental website "Δι@ύγεια", if necessary.

Diagrams 1 and 2 illustrate the categorization of the Plenary decisions and hearings respectively.

Diagram 1
Categorization of EETT Plenary decisions,
2021

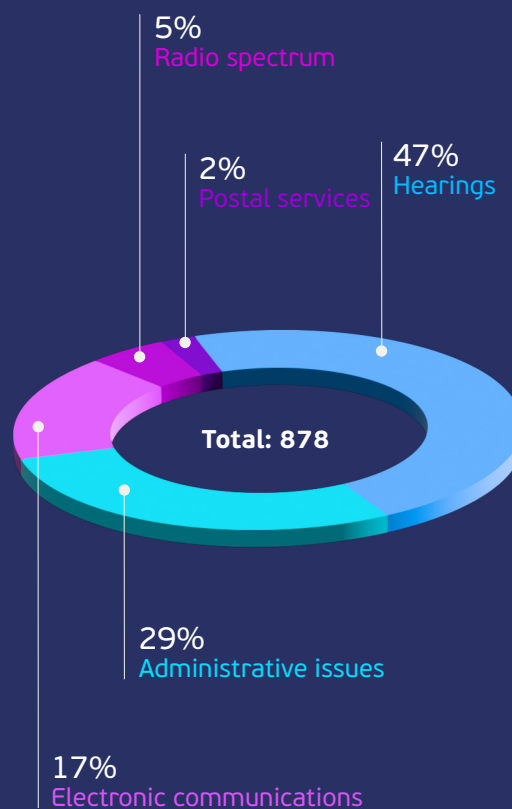
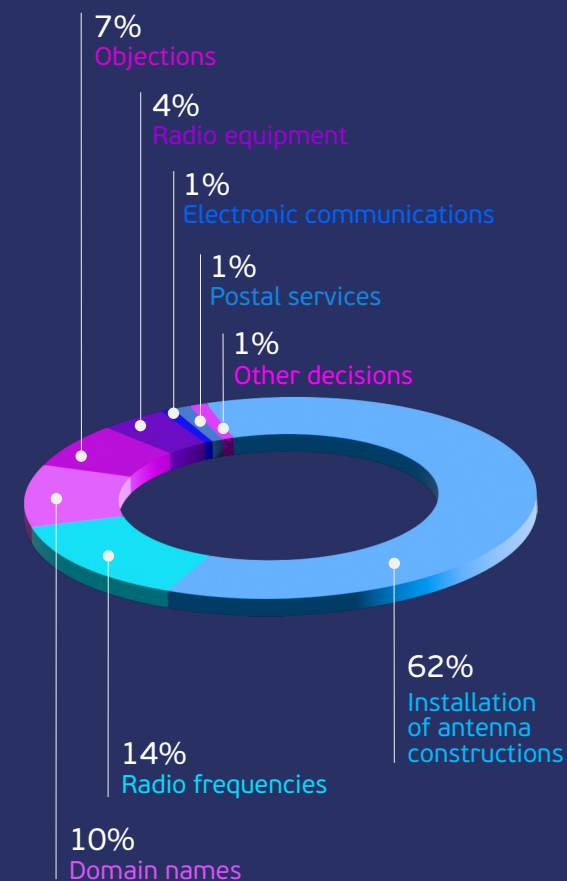


Diagram 2
Categorization of EETT Plenary decisions
on hearings, 2021



Source: EETT

Summary of actions per sector

Regulation & Supervision

In 2021, connectivity continued to play a central role as being a key consumer demand. In this context, EETT implemented actions and took measures in order to ensure that consumers have access to reliable electronic communications and postal services, which meet their increased demands and special conditions due to the COVID-19 pandemic.

At the same time, through the implementation of its multi-layered objectives EETT set out a framework for the proper functioning of markets and further enhancement of competition for the benefit of consumers and the economy. It also implemented targeted informative actions.

A summary of EETT's work during the year follows.

Consumer issues

EETT handled approximately 11,000 consumer complaints regarding electronic communications and postal services. After evaluating the issues, EETT intervened, where appropriate, in order to safeguard consumers' rights.

EETT also launched major initiatives and communication actions in order to further strengthen consumer protection. With the new General Authorizations Regulation for electronic communications it strengthened consumer protection regarding timely notification of contract termination, information on important issues and the minimum charge for service interruption, as well as other issues. At the same time, EETT carried out audits on arbitrary

contract activation by telephone companies and deleted domain names associated with illegal activities. In addition, it started the process for issuing a new Code of Conduct, aiming, among other things, to enhancing transparency, effective problem solving and serving vulnerable groups. Furthermore, EETT submitted a proposal to the Minister of Digital Governance regarding the amendment of the Universal Service (US) content by specifying the minimum requirements for Internet access and other related matters.

In 2021, the National Open Internet Regulation for mobile networks came into full force and companies now enter into a commitment towards subscribers with regard to the actual maximum speeds

that may be achieved on connections. In addition, in order to allow subscribers to use the terminal equipment of their choice, it conducted a public consultation on the definition of the boundary between public and private electronic communications networks.

Consumer awareness continued to be EETT's main concern. Indicatively EETT issued recommendations during the festive season and sales days concerning postal services and wireless devices. In the same context, EETT increased social media presence by posting news and informative videos. Moreover, it published the results of a survey conducted on the use of intelligent services which was of great interest.



Electronic communications sector

Market analysis

- *Leased Lines Markets:* The questionnaire for data collection was revised in order to be aligned with the new market definition at retail and wholesale level.
- *Central and local access markets:* The necessary data for the 5th round of market analysis were collected. The providers submitted detailed geographical data at retail and wholesale level, on the basis of which EETT will assess the level of competition. In addition, a public consultation was conducted regarding the determination of the appropriate terms and conditions for the transition process from OTE traditional infrastructure (copper network) to the next generation networks.

Deployment of next generation networks: The supervision of the implementation process regarding next generation networks, through VDSL Vectoring technology in the access network, was continued.

General Authorizations Regulation: A new General Authorizations Regulation was issued in order to further strengthen consumer protection.

Universal Service: Recommendations were submitted to the Minister of Digital Governance for the issuance of the following Ministerial Decisions (MD).

- *Content:* The content of the US is specified and the service of adequate broadband Internet access is defined.
- *Measures concerning the affordability of services:* Additional features are provided when users are required to bear part of the cost in order for the

Universal Service Provider (USP) to provide fixed telephony services and adequate broadband Internet access.

- *Sharing the Universal Service Net Cost:* The proposed procedure is described.

Furthermore, EETT conducted a public consultation on the definition of the service quality indicators of US and its measurement methods, as well as their targets for services regarding access to the public electronic communications network, interpersonal communications and Internet access.

Bottom-up LRIC+ techno-economic model: A decision was issued on the modified model.

Reference offers:

- *Wholesale local access to services:* A draft amendment of OTE 2018 reference offer for wholesale local access was approved.
- *Leased Lines-Interconnection:* New OTE reference offers were approved.

Open Internet: The National Open Internet Regulation for mobile networks came into full force.

National Numbering Plan: The new provisions of the Regulation regarding the management and allocation of numbering resources of the National Numbering Plan came into force.

Premium Rate Services (PRS): A public consultation was held on the implementation of a process that could provide mobile services subscribers the option to choose charging pre-activation by receiving a text message.

Domain names: The assigned domain names with the extensions [.gr] and [.ελ] increased by 34,302, resulting to an increase of approximately 7% compared to 2020. By the end of 2021, a total number of 529,489 names were assigned.

Trust Services: A Recommendation was submitted to the Minister of Digital Governance regarding regulatory obligations of trust services providers, the approval process and other related issues. Moreover, the new services of the Hellenic Public Administration Certification Authority were certified as approved trust services.

Quality indicators: The Regulation on quality indicators was amended and codified following a public consultation.

Number Portability: A total of 736,474 numbers were ported, an increase of 5% compared to 2020.

Supervisory and monitoring actions:

- *Cost-accounting audit:* The annual cost-accounting audit of OTE as the provider that holds Significant Market Power (SMP) in the relevant markets was conducted. Furthermore, the compliance audit of the mobile communications providers COSMOTE, VODAFONE and WIND with the obligation of accounting separation for the years 2016-2019 commenced.
- *Audit on OTE bundled offers:* OTE bundled offers were audited and it was found that there is no margin squeeze. Also, 32 related decisions were issued.
- *Methodology of margin squeeze assessment:* A public consultation was held on the development of a new margin squeeze model.

- **Universal Service Net Cost Audit:** The results of the audit for the 2012-2016 Universal Service Net Cost calculation submitted by OTE were published. A decision was also issued for the sharing of the Universal Service Net Cost for each year among the liable providers who met the relevant participation criteria in the corresponding year. In addition, an audit was launched regarding the Universal Service Net Cost for the years 2017-2019.
- **Audits of OTE Leased Lines offers:** The data for 44 retail offers submitted by OTE were examined in detail and it was found that there is no profit margin squeeze.
- **Rural networks:** The prices of wholesale access services submitted by broadband infrastructure development companies in white areas of the country were approved.
- **Premium Rate Services:** Market monitoring continued, while the number of complaints submitted to EETT decreased, compared to previous years, in the context of the implementation of the new Code of Conduct.
- **Implementation of National Open Internet Regulation:** As part of the National Open Internet Regulation implementation, a total of 184 inspections were carried out at retail shops of fixed networks providers, nationwide. Providers were called upon to immediately comply with the Regulation.
- **Alert system for the disruption of access to domain names/Internet Protocol addresses due to illegal transmission of content:** An alert system was launched aiming at the immediate intervention, following requests from public authorities, re-

garding the disruption of access to domain names and Internet Protocol (IP) addresses due to illegal activities.

- **Audits regarding providers' compliance with obligations:** A total of 410 outdoor cabins were inspected to ensure seamless provision of next generation and existing Local Loop services. Furthermore, 264 audits were carried out nationwide at points of sale of telephony and Internet service providers regarding the degree of compliance with the regulatory framework.
- **Dispute Resolution:** Requests submitted by electronic communications services providers were examined.

Radio spectrum sector

Deployment of 5th generation networks: The licensing of antenna constructions for the deployment and expansion of 5th generation (5G) mobile communications networks continued intensively aiming at the nationwide coverage.

Revision of the Regulation on the terms of use of the radio spectrum: The Regulation on the terms of use of the radio spectrum was revised and new provisions arising under EU law were incorporated into the national regulatory framework.

Renewal of rights of use in the 410-430MHz band: The tender document which defines the procedure, terms and conditions for the granting of rights through tender process had been subject to public consultation.

Granting of radio frequency rights of use: New radio frequency rights of use for fixed service, broadcast-

ing transmission programmes, Private Mobile Radio (PMR) networks and terrestrial satellite station services were granted and also existing ones were modified, as appropriate.

Licensing of antenna constructions: The provisions of the framework for standardised antenna constructions were expanded in order to include those of the fixed-satellite service. Moreover, new and modified existing antenna construction licences were granted through the Electronic Application Submission System for antenna constructions. Acts were issued as well for the subsumption of land-based antenna constructions under the scope of Environmental Commitment Standards.

Supervisory and monitoring actions:

- Ex officio inspections of radio spectrum proper use were carried out and requests/complaints were investigated on matters such as interference to mobile communication base stations, PMR networks and amateur radio stations operation. Also, relevant actions were taken regarding interference issues and complaints concerning information provision, compliance audit, illegal emissions/installations of radio and television stations and antennas, compliance with broadcasting technical specifications, as well as inspections to cease illegal emissions. Priority was given to the protection of wireless networks relating to the protection of human life, as well as public and national security.
- A total of 12 radio equipment devices were sampled to verify their compliance with the legislation.

Postal services sector

Universal Service Net Cost Verification: The verification report regarding the Universal Service Net Cost of the USP (ELTA) for the year 2019 was submitted to the Minister of Digital Governance. At the same time, the project of the Universal Service Net Cost verification for the year 2020 commenced.

Evaluation of the cost accounting system of ELTA: The USP cost accounting system for the years 2019-2022 was approved, following an evaluation.

Universal Service quality measurement: Quality measurement of the US for 1st priority domestic mail contin-

ued. The speed index (H+3) for 2021 was estimated at 68.9%, showing a significant decline compared to 2020. Accordingly, the reliability index (H+5) was estimated at 86.1%, representing a reduction in relation to 2020 when it was 97.9%. It should be pointed out that the USP fell below the quality targets set out for the years 2020 and 2021.

Reforming of the Universal Service content: Recommendation of an Opinion to the Minister of Digital Governance was issued regarding the definition of the services that fall under the US, as well as of special terms and conditions for the provision of postal services to blind or partially-sighted persons.

Postal services providers registry: A total of 433 requests for registration/modification of data in the postal services providers registry and 29 requests for cessation of activities were handled.

Approval of cluster mailbox installations: The installation of 8,925 cluster mailboxes was approved in order to serve 25,300 households in 5 prefectures of the country with incomplete numbering or without unique street names.

Market development: A study on the quantitative and qualitative analysis of the postal market, the presentation of trends and perspectives and also the evaluation of the existing regulatory framework was initiated.

Research on the use of courier parcel services: A nationwide consumer survey on the use of courier parcel services was launched with the aim of capturing consumer habits and experience.

Auditing providers' compliance with obligations: A total of 54 audits were carried out, either ex officio or following complaints, at the premises of providers in order to verify the degree of compliance with their licence conditions. Moreover, on-the-spot audits were carried out in networks (stores) of licensed providers regarding their compliance with the Code of Conduct and the Charter of Obligations towards Consumer.

International cooperations

EETT, with its know-how, responds to current challenges and contributes to the work of the European/international groups in which it has a coordinating role or participates. In this context, EETT co-shapes the developments, intervening in key issues.

In 2021, EETT Vice President for the sector of postal services, Dr Spyros Pantelis, held the chairmanship of the European Regulators Group for Postal Services (ERGP) for the second consecutive year. Moreover, the Body of European Regulators for Electronic Communications (BEREC) elected EETT President, Professor Konstantinos Masselos, as Chair of the Body for the year 2023 and Vice-Chair for the years 2022 and 2024. At the same time, actions taken during the year by the other bodies in which EETT participates were also important.



Competition

EETT's interventions to ensure proper functioning of competition were of crucial importance. In particular, as a competition authority in the markets of electronic communications and postal services, it examined cases, following complaints, in order to verify providers' compliance with free competition legislation.

EETT contributed to the updating of the Law on Competition by submitting comments to the rele-

vant public consultation of the Ministry of Development. It also continued to collect, process and publish data on electronic communications and postal services markets.

At the same time, EETT submitted its positions on the Proposal for a Regulation of the European Parliament and the Council on contestable and fair markets in the digital sector. EETT's cooperation with the Directorate-General for Competition of the

European Commission was of great importance. On this basis, it participated in a public consultation regarding the definition of the relevant market for the purposes of EU law. Furthermore, EETT contributed to the work of the European Competition Network (ECN).



Key data



Plenary
sessions



878 Plenary decisions

155 hearings

414

decisions on hearings*

324

decisions imposing
administrative sanctions*

* Decisions on hearings held
in 2019 and 2020 are included.



Consumer
issues



11,114
consumer complaints



8,854

on electronic communications



2,260

on postal services

Key data



Electronic
communications

529,489

total assignments of domain names by
the end of 2021

34,302

assigned domain names in 2021

410

audits on next generation
networks equipment

264

audits at retail shops of
telephony and Internet
service providers

157

cases of disruption of access to
domain names and IP addresses
due to illegal transmission of
content

137

processing of providers'
requests for numbering
resources

47

processing of companies'
requests for a General
Authorization

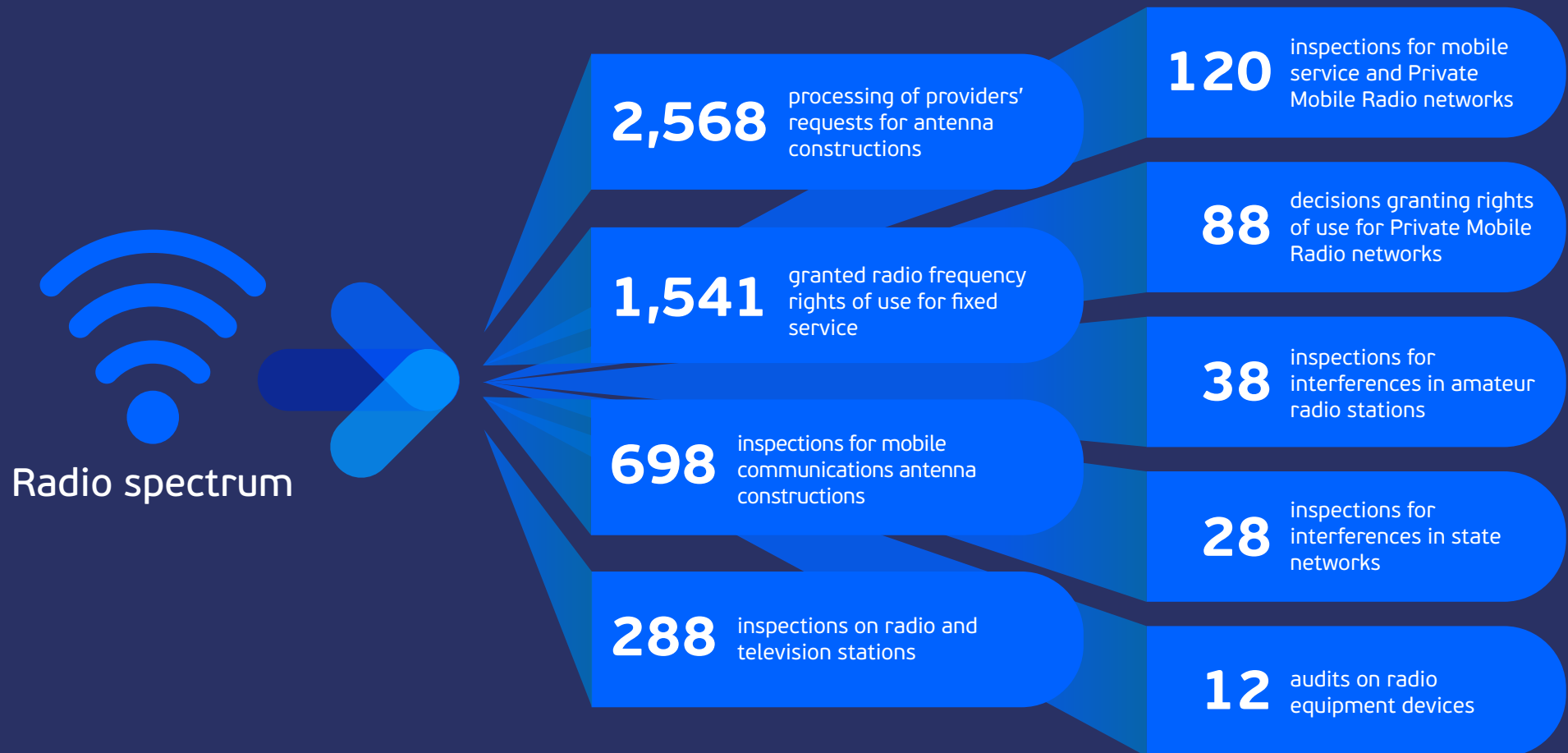
28

deletions of domain
names associated with
illegal activities

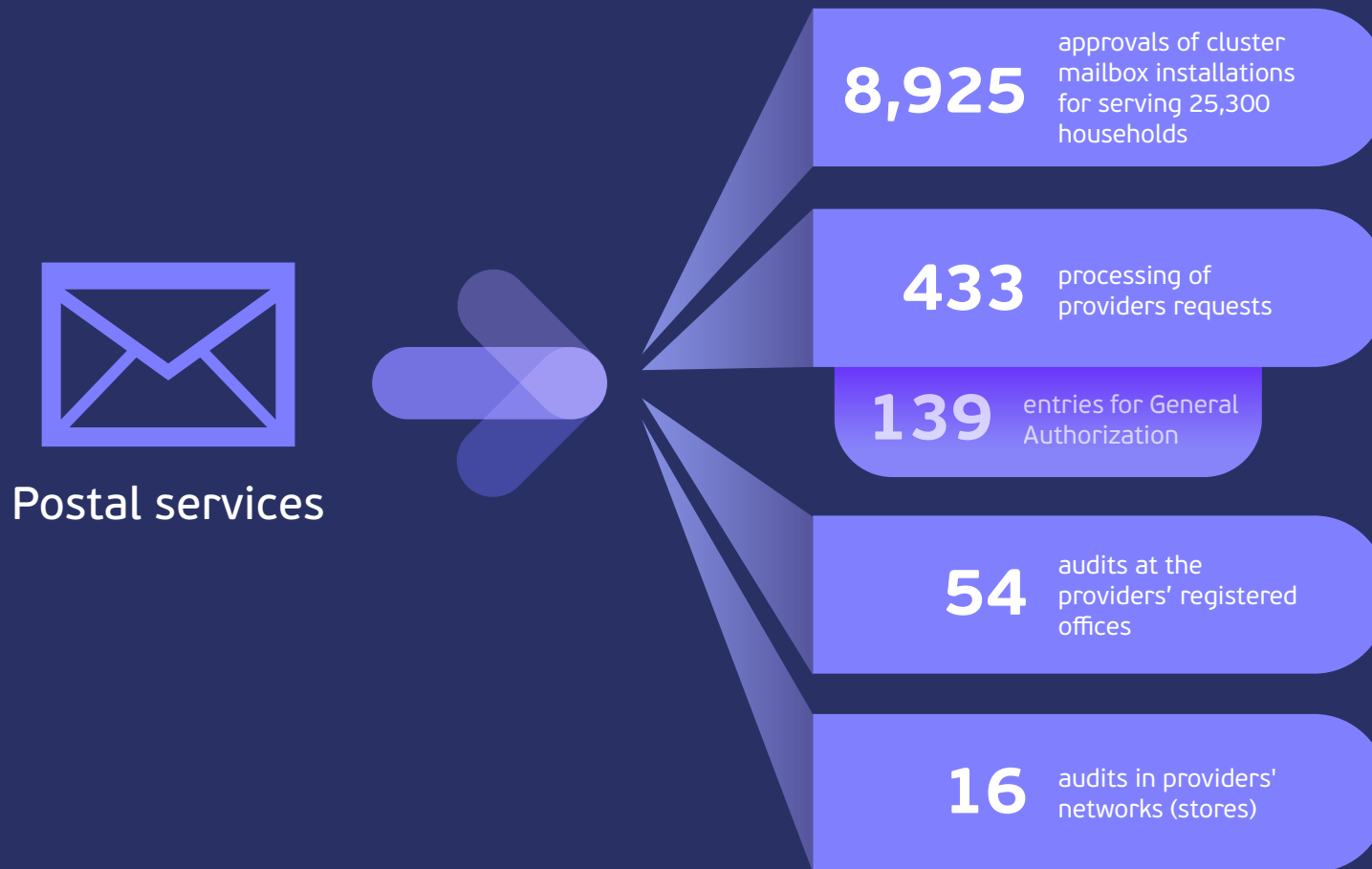
22

approvals of new
domain name
registrars' requests

Key data



Key data





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