



EETT

HELLENIC TELECOMMUNICATIONS & POST COMMISSION

ANNUAL REPORT

Summary of actions

2022

DIGITAL EDITION



EETT

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less paper, more trees

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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).

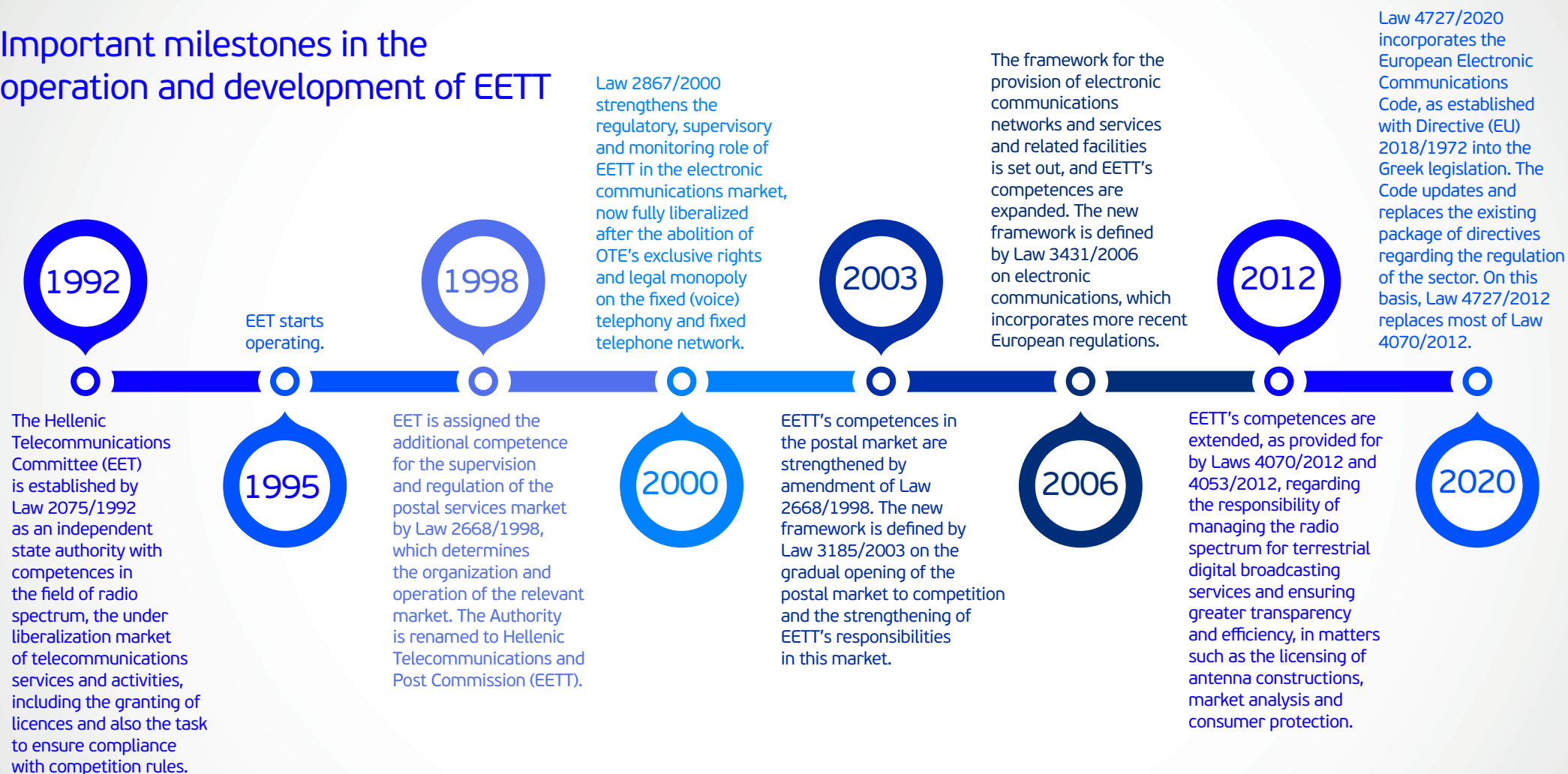
EETT regulates, supervises and monitors:

- 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





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.

Plenary composition

01/01/2022-17/03/2022

**Professor
Konstantinos Masselos**
President

**Associate Professor
Dimitris Varoutas**
Vice President
for Electronic Communications

Dr Spyros Pantelis
Vice President
for Postal Services

**Professor
Antonios Gasteratos**
Member

Eleni Gousiou
Member

Dr Nikolaos Kapsalis
Member

**Associate Professor
Grigorios Koulouras**
Member

Dr Argiro Magkanioti
Member

**Professor
Aristea Sinanioti-Maroudi**
Member

18/03/2022-31/12/2022

**Professor
Konstantinos Masselos**
President

**Associate Professor
Dimitris Varoutas**
Vice President
for Electronic Communications

Dr Spyros Pantelis
Vice President
for Postal Services

**Professor
Antonios Gasteratos**
Member

**Professor
George Dimitrakopoulos**
Member

**Professor
Athanasios Panagopoulos**
Member

Angelos-Zikos Peponis
Member

Dr Petros Potikas
Member

**Professor
Aristea Sinanioti-Maroudi**
Member



Summary of actions

A. Plenary meetings

In 2022, the EETT Plenary adopted a total of 600 decisions within 47 meetings. The decisions concerned the following issues:

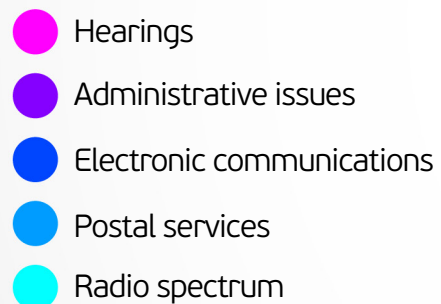
- Licensing.
- Regulation and supervision/monitoring of the sectors of electronic communications, radio spectrum and postal services.
- Competition issues.
- Hearings of operators on issues related to their activity.
- EETT administrative matters.

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, 2022



Source: EETT

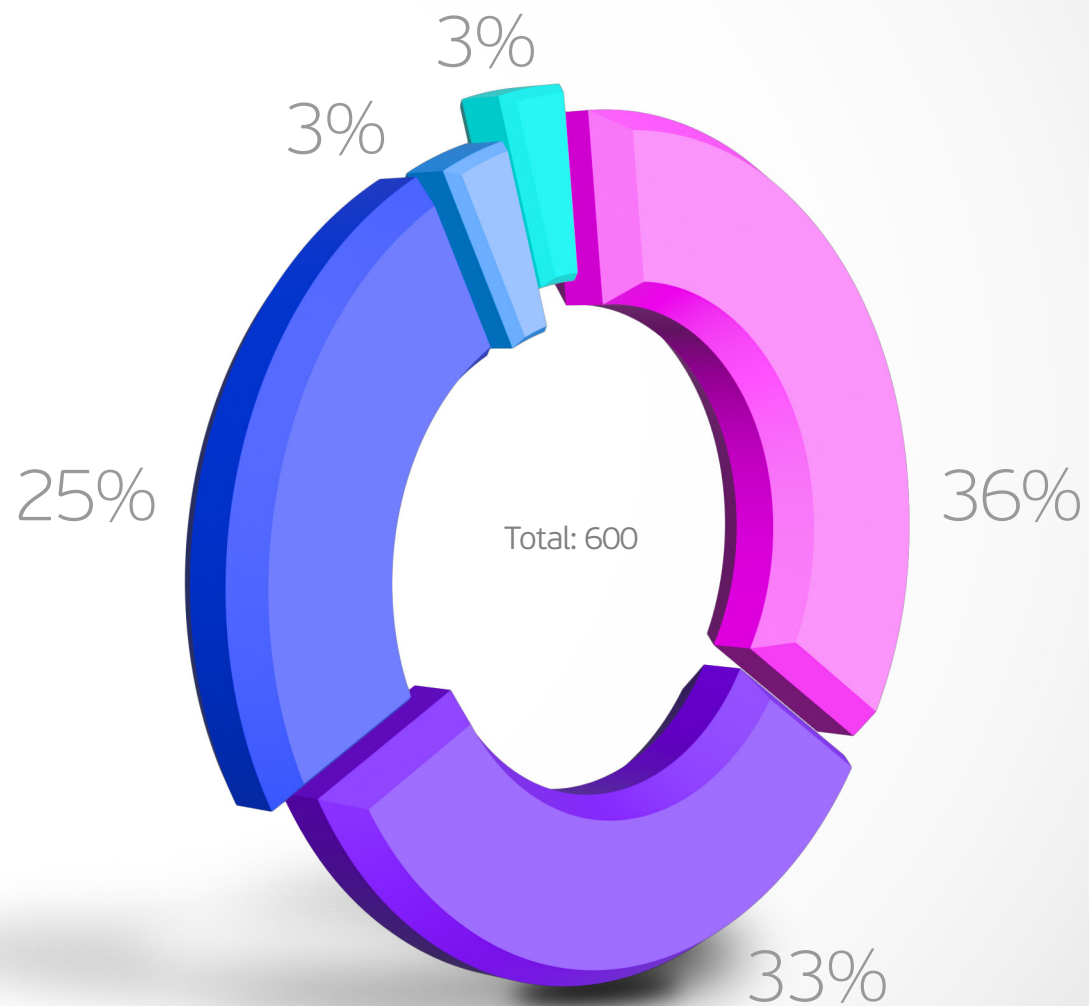
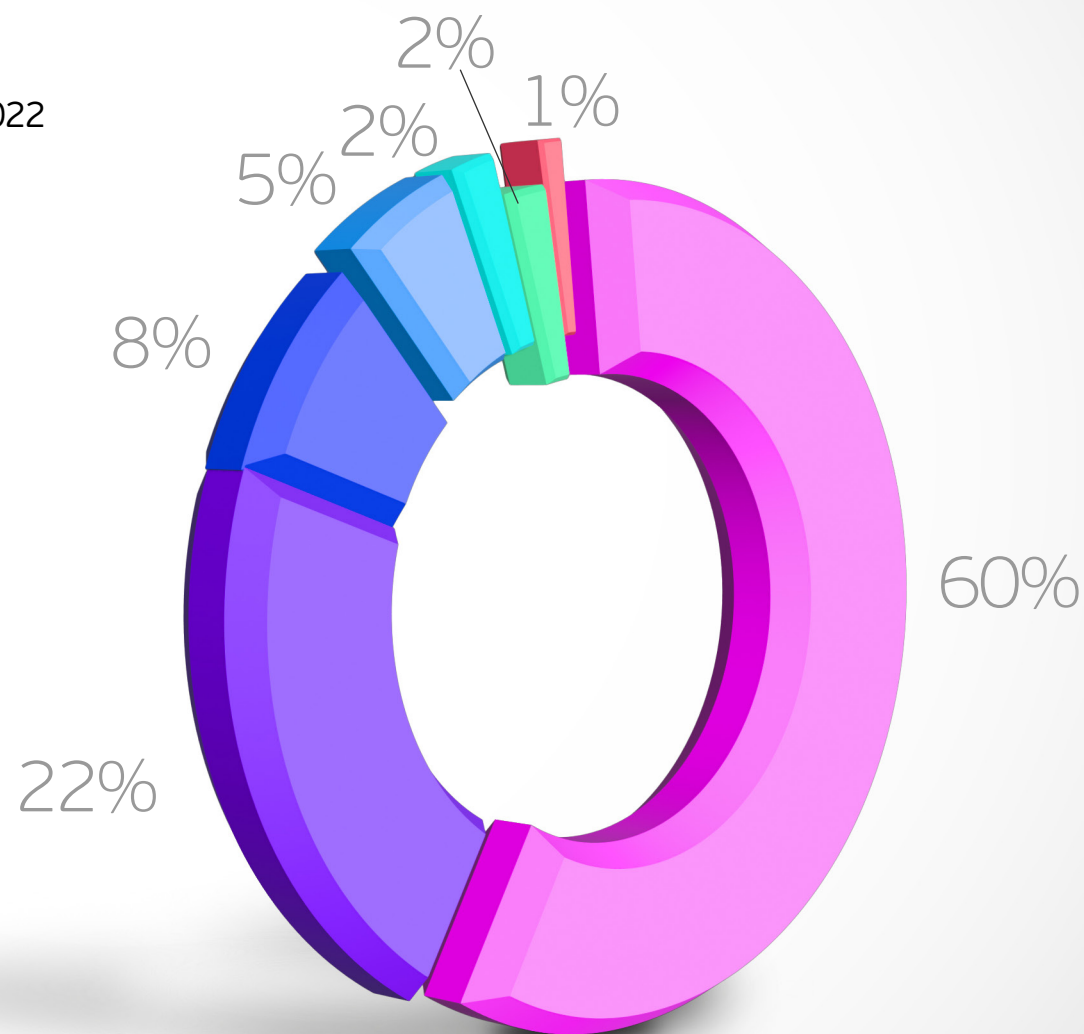


Diagram 2

Categorization of EETT Plenary decisions on hearings, 2022

- Installation of antenna constructions
- Radio frequencies
- Domain names
- Objections
- Electronic communications
- Other decisions
- Radio equipment

Source: EETT



B. Actions by sector

Regulating & Monitoring

In 2022, EETT carried out key regulatory and supervisory-monitoring actions in the sectors of electronic communications, radio spectrum and postal services, in order to meet consumers' current needs and to enhance the level of protection thereof. At the same time, EETT ensured the proper functioning of the above markets, as well as the optimal use of the radio spectrum, enhancing competition and creating growth opportunities for the benefit of consumers and the economy.

Consumer issues

EETT has taken important initiatives to ensure that users make the most of the choices between services and operators and have access to reliable services that meet their requirements. In this context, EETT handled 9,733 consumer complaints. The majority of issues, in the case of electronic communications, concerned disputed charges, ongoing failure and poor quality of service. For postal services, complaints were main-

ly related to delayed delivery of items and inability to communicate. After evaluating complaints, EETT intervened with regulatory and monitoring actions, where appropriate, in order to safeguard consumer rights.

In addition, the new Code of Conduct for electronic communications sets out the general principles that companies should follow when providing services, aiming to further strengthening the rights of consumers, in particular those of vulnerable groups. On the same basis, EETT took actions to ensure equal access to electronic communications services for persons with disabilities. Moreover, in a Regulation issued by the Commission, consumers will be able, from October 2023, to choose the terminal equipment (e.g. router) they use for their local private network.

In the context of monitoring actions, EETT deleted domain names of websites containing material related to child pornography, after informing the Cyber Crime Division and issuing a relevant prosecutorial order. Following decisions of the Interagency for

Market Control (DIMEA), EETT deleted domain names associated with illegal trade and/or trafficking of goods.

EETT's main concern is to provide timely and accurate information to consumers so that they can make the right choices. On this basis, EETT regularly posts useful information on consumer rights, the available options and its interventions. Indicative actions regarding the above issues were the publication of information material and recommendations, e.g. on how to pick up products from online markets and how to use mobile phones, as well as information actions through EETT website and social media. Also, a survey was conducted on the use of courier parcel services.

Electronic communications sector

Market analysis

- *Central and local access markets:* The wholesale central and local access markets were defined in the draft measure and traditional ADSL copper, fiber/copper and VDSL, and VDSL Vectoring networks, as well as Fiber to the Home

Summary of actions

(FTTH) network are included. EETT concluded that OTE still holds Significant Power in these markets and decided on the imposition of appropriate regulatory obligations.

- *Voice call termination market:* The deregulation of the market for call termination on individual mobile networks in the territory was approved.

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

NGA Bottom-up L2 WAP techno-economic model: The extended Bottom-up LRIC+ techno-economic model for the calculation of access prices for new generation and copper networks was approved. In addition, the prices for two additional wholesale L2 WAP Leased Lines services, were set.

Determination of Ethernet urban/transit circuit prices: The methodological principles and the structure of the techno-economic

model (Bottom Up LRIC+) for the calculation of the product prices regarding markets for wholesale Leased Lines terminal blocks and trunk segments have been subject to public consultation.

Wholesale Leased Lines: The text of OTE's reference offer was finalized, following public consultations and meetings with the operators.

General Authorization Regulation: A new Regulation was issued, with the main amendments being the change of service descriptions in order to be compatible with those of the Body of European Regulators for Electronic Communications (BEREC), the publication by operators of the characteristics and appropriate network interfaces, and the adoption of measures in cases where the terminal equipment selected by the user causes damage to the public electronic communications network.

Code of Conduct: As mentioned above, a new Code of Conduct for the provision of electronic communications services to consum-

ers has been issued, setting out the basic obligations of operators towards consumers.

Co-location Regulation: A public consultation was held on the amendment of the Regulation.

Public Consultation Regulation: A new Regulation on the procedure for public consultations on issues relating to electronic communications and postal services markets has been put out for public consultation.

Universal Service

- *Provision of Universal Service:* Decisions were adopted on the principles for the costing of the Universal Service (US), its quality indicators and its performance targets. In addition, following recommendations submitted in 2021 to the Minister of Digital Governance, Ministerial Decisions (MD) were issued on the content and procedure for the designation of a Universal Service Provider (USP), the allocation of the Universal Service Net Cost and the provision of affordability measures.

Summary of actions

- *Universal Service Costing Principles:* A Regulation has been issued to define the principles for the US cost and the methodology for the calculation of the Universal Service Net Cost. In addition, the content of the Regulation regarding the definition of the calculation and assessment criteria of possible unfair burden on the USP has been put out for public consultation.

Open Internet: The review of the National Open Internet Regulation has started in relation to the decisions of the Court of Justice of the European Union (CJEU) and the adoption by BEREC of the updated Guidelines for the implementation of the Open Internet. In addition, EETT considered it necessary to upgrade the HYPERION, the broadband quality assessment system, taking also into account subscribers' increased interest.

Domain names: The assigned domain names with the extensions [.gr] and [.ελ], increased by 29,369, resulting to a rise of about 6% compared to 2021. Since

2004 the pace of assignments has been positive. The total number of assigned domain names by the end of 2022 was 558,858.

Trust services: The EETT registry of trust services providers located in Greece was updated and the review of providers' Compliance Assessment Reports was completed. Requests for the use of remote authentication methods and the inclusion of new registration authorities were approved. In addition, inspections were conducted on providers in order to determine their compliance with Regulation (EU) 910/2014 (eIDAS) and the Trust Services Regulation of EETT. In addition, a recommendation was submitted for approval to the Minister of Digital Governance regarding the regulation of specific issues for the provision of approved trust services, as well as the revocation of approved certificates.

Number portability: A total of 741,646 numbers were ported, of which 427,911 were mobile and 313,735 were fixed line numbers.

Determination of publishers' fees from Information Society service operators: EETT was assigned a mediating role in the negotiations on the determination of publisher's fees to be paid by Information Society service operators.

New price squeeze model: The final measure regarding the methodology and the development of the price squeeze model for SMP's bundled offers was approved. The new model came into force as an interim measure, for the last two months of the year.

Supervisory and monitoring actions

Monitoring: A total of 1,063 inspections were carried out for ensuring operators' compliance with obligations towards consumers, the procedures for the deployment of new generation networks, the National Open Internet Regulation and the framework for trust services, the Code of Conduct for Premium Rate Services (PRS) and obligations regarding the EETT registry.

Audit on OTE bundled offers: The bundled offers submitted by OTE were audited

Summary of actions

before launching into the market and 41 related decisions were issued.

Cost accounting audit

- *OTE Cost accounting audit:* The decision that had been issued in 2021 on the annual cost accounting audit of OTE was amended.
- *DIGEA cost audit:* The review and update of the techno-economic model of DIGEA for the period 2018-2021 have been completed.

Universal Service Net Cost Audit: The audit for the calculation of the Universal Service Net Cost regarding data of the US for the years 2017-2019 was continued.

OTE Leased Lines offers audit: The data for 1,860 retail offers for Leased Lines services submitted by OTE were audited and no margin squeeze was found or detected.

Premium Rate Services: Audits to verify operators' compliance with the regulatory framework were continued.

Quality indicators: The new Regulation on quality indicators for electronic communications services has been implemented.

Alert system: The access to 525 Internet Protocol (IP) addresses and 14 domain names were blocked because of illegal content transmission.

Dispute resolution: Negotiations continued for the achievement of a commercial agreement between the Municipality of Spata-Artemis and WIND (now NOVA) in the context of a dispute resolution between them. In the proceedings before the Dispute Settlement Committee of EETT, the parties entered into negotiations which led to a commercial agreement and a waiver by WIND of its application before EETT.

Radio spectrum sector

Revision of the radio spectrum terms of use Regulation: The procedure for the revision of the Regulation on the terms of use of the radio spectrum has been launched, incorporating into the national regulatory framework new provisions arising under EU law.

Renewal of rights of use in the 410-430MHz band: The tender procedure has been completed and the rights to use spectrum in the 410-430MHz band have been granted, where OTE has been declared successful tenderer for the provision of Terrestrial Trunked Radio (TETRA) services.

Consultation on the Regulation on usage fees and spectrum assignment on a temporary basis: The new Regulation setting the fees for the use and allocation of radio frequencies regarding granting of rights on a temporary basis for exceptional/unforeseen or of limited duration events has been put out for public consultation.

Granting of radio spectrum rights of use: New radio spectrum rights of use for the fixed service, transmission of broadcasting programmes, Private Mobile Radio (PMR) networks and terrestrial satellite station services were granted, as well as existing ones were amended.

Licensing of antenna constructions: The provisions of the framework for Low Electromagnetic and Environmental Nuisance

Summary of actions

Antenna Constructions have been extended to accelerate the deployment of high-speed wireless networks. In addition, public safety has been enhanced and provision has been made for the disclosure of information on the above facilities. Moreover, the necessary functionality has been developed in the Electronic Application Submission System for antenna constructions regarding the submission and management of the declarations concerning Low Electromagnetic and Environmental Nuisance Antenna Constructions. New and amended existing antenna construction licences were granted through the Electronic Application Submission System for antenna constructions. Declaratory acts were issued for the inclusion of antenna subsumption of land-based antenna constructions under the scope of Environmental Commitment Standards.

Optimizing the surveillance of the radio equipment market: A database has been developed, using own resources, in which data are kept regarding devices inspected and samples taken, the type of inspections and their progress, as well as the competent staff.

Supervisory and monitoring actions:

- 530 ex officio inspections on the proper use of spectrum were carried out and requests/complaints were investigated on issues including interferences to mobile communications base stations reception frequencies, the operation of PMR networks and amateur radio stations, interferences and complaints concerning the information provision, legality audit, compliance with broadcasting technical specifications, illegal emissions/installations of radio and television stations and antennas, as well as inspections to cease illegal emissions. Priority was given to the protection of wireless networks related to the protection of human life, as well as public and national security.
- A total of 49 radio equipment devices were sampled to verify their compliance with the legislation.

In addition, a technologically innovative and geographically extensive Spectrum Monitoring System is being gradually implemented, aiming at a more effective spectrum monitoring and optimal use.

Postal services sector

Universal Service Net Cost verification: The verification report regarding the Universal Service Net Cost of the USP (ELTA) for the year 2020 was submitted to the Minister of Digital Governance. At the same time, the verification of the Universal Service Net Cost for the year 2021 has been entrusted to an independent body and is expected to be completed by the end of 2023.

Pricing policy of the USP: The assessment of the submitted by the USP tariff for letter mail and parcel services commenced.

Universal Service quality measurement: Quality measurement of the Universal Service for 1st priority domestic mail was continued. The H+3 index was estimated at 68.2%, showing a slight decrease compared to 2021 (68.9%). Accordingly, the H+5 index was estimated at 85.5%, decreased in relation to 2021 (86.1%). It should be noted that the USP fell short of the quality targets set out to be achieved for the years 2021 and 2022.

Approval of cluster mailbox installations: The installation of 2,620 cluster mailboxes was

Summary of actions

approved in order to serve 20,044 residents in 4 prefectures across the country with incomplete numbering or without unique street names.

Revision of the regulatory framework: The revision of the regulatory framework regarding the provision of postal services under General and Special Authorization has been launched.

Withdrawal of General Authorizations: A total of 107 General Authorizations of postal services operators were withdrawn. Also, the procedure for the collection of outstanding fees was launched, in accordance with the provisions of the Public Revenue Collection Code.

Cross-border parcel delivery services: Data was collected on tariffs for cross-border parcel delivery services under Regulation (EU) 2018/644. The existence of tariffs in the Greek market that could be considered excessively high was investigated and an assessment was submitted to the European Commission.

Parcel lockers: The possibility of using parcel lockers on a nationwide level was investigated.

Nationwide survey on the use of courier parcel services: A nationwide survey was conducted on the use of courier parcel services and the experience of consumers.

Study on the development of the market: A study was carried out on the quantitative and qualitative analysis of the postal market, the trends and prospects, as well as the assessment of the existing regulatory framework. The study led to a series of proposals on reforming the regulatory framework and enhancing the development of the postal market.

Monitoring actions

- **Operators inspections:** A total of 132 inspections were carried out, either ex officio or following complaints, at the premises of operators in order to verify the degree of compliance with their licence conditions. In addition, inspections were carried out on businesses not registered

in EETT registry in order to investigate any illegal activity.

- **Inspections in networks of licensed operators:** A total of 104 on-the-spot inspections were carried out in networks (stores) of licensed operators. In particular, compliance with the Code of Conduct for the provision of postal services and the Charter of Obligations towards Consumer was investigated.

Investigation of complaints about deficient postal services provision: The examination of consumer complaints about breaches of the regulatory framework by postal services operators continued during the second period of the pandemic restrictive measures. In particular, after examining 640 complaints, each one individually, and conducting hearings, it was found in the majority of cases that there were deficiencies in the provision of postal services. In this context, fines totaling EUR 175,000 were imposed.

Competition

EETT, as the Competition Authority, in the electronic communications and post-

Summary of actions

al services markets, intervenes ex officio or upon complaints, by preventing and/or suppressing anti-competitive practices. The Authority proactively controls mergers of enterprises to ensure that they do not restrict competition. In this context, EETT launched an investigation regarding the notification by the operators VODAFONE and WIND (now NOVA) of the implementation/extension of the Radio Access Network (RAN) Sharing agreement to urban centres in the territory, in 4G and 5G technologies. After a thorough examination of the information submitted, EETT considered that there is no obligation to notify the acquisition of CONNECT TOPCO LIMITED by the provider VIASAT INC.

Furthermore, EETT updated the way that Pricescope (Price Observatory for telecommunications and postal services) benchmarking prices are calculated in order for it, to be compatible with the new mobile and prepaid rates and its recommendation on the prices displayed.

A new service was launched in order consumers to be informed regarding charges for short codes and non-geographic numbers per operator and programme. At the same time, the implementation of a Market Monitoring System was initiated, which, among other things, will allow for advanced combinatorial and statistical data analysis and faster production of results. In addition, EETT, as the official body of the Hellenic Statistical System, published information related to the statistics it produces.

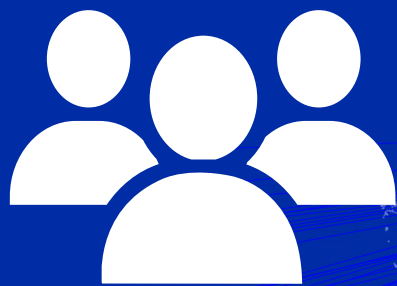
International cooperations

In 2022, EETT President, Professor Konstantinos Masselos, served as BEREC Vice-Chair and has been elected Chair for 2023. In this context, EETT played a central role in the preparation of the Work Programme 2023. The key priorities of BEREC's strategy are to promote full connectivity for consumers and businesses, foster sustainable and open digital markets, and empower consumers.

EETT Vice President for Postal Services, Dr Spyros Pantelis, has served as Vice-

Chair of the European Regulators Group for Postal Services (ERGP). On this basis, EETT contributed to the actions for the Work Programme 2022, with an active role in executive meetings and Working Groups.

During the year, EETT contributed with its expertise to the work of European/international groups in which it participates or has a coordinating role, co-shaping regulatory, technological and competition developments.



Plenary meetings

600

Plenary decisions

215

decisions on hearings

192

decisions imposing administrative penalties*

168

hearings

**Decisions on hearings held in previous years are included*

Key data



Consumer issues

9,733

consumer complaints

8,461

on electronic communications

1,272

on postal services



Electronic communications

558,858 total assignments of domain names by the end of 2022

29,369 assigned domain names in 2022

195 processing of operators requests for:

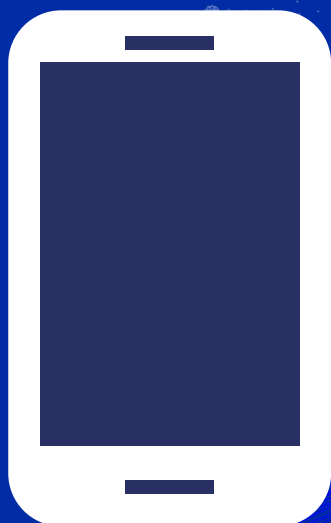
41 entries for General Authorization

74 General Authorization amendments

80 cessation of services provision

133 processing of operators' requests for numbering resources

23 approvals of new domain name registrars' requests



Electronic communications

Monitoring actions

1,063

inspections on operators' premises for the following issues:

484 regarding operators' obligations towards consumers

265 on next generation networks

260 on the National Open Internet Regulation

26 on obligations regarding EETT registry

20 on Premium Rate Services (PRS)

8 trust services

539

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

88

cases of suspension of domain names due to illegal trade and/or trafficking of goods

4

cases of suspension of domain names due to child pornography



Radio frequency spectrum

3,834

processing operators' requests for antenna constructions

1,815

granted rights of spectrum use for fixed service

93

decisions on Private Mobile Radio (PMR) networks

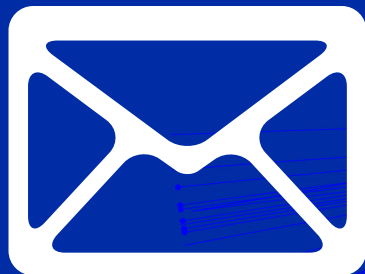


Radio frequency spectrum

Monitoring actions

579 inspections for the following cases:

- 176** for mobile communication antenna constructions
- 160** in radio stations
- 103** on mobile communications service
- 49** in radio equipment devices
- 46** for interference in state networks
- 29** for interference in amateur radio stations
- 16** on satellite services



Postal services

2,620

mailboxes approved for installation in order to serve 20,044 residents

611

processing of operators' requests

60

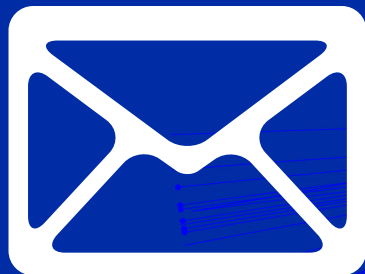
entries for General Authorization

413

General Authorization amendments

138

cases of General Authorization withdrawal (ex officio or upon request)



Postal services

Monitoring actions

236

inspections on operators

132

at operators' premises

104

in networks of licensed operators



HELLENIC TELECOMMUNICATIONS & POST COMMISSION

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Hellenic Telecommunications & Post Commission

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