

The citizen at the centre of EETT actions



Reliable and affordable communications for everyone

Creating a favorable environment for investments

Ensuring the proper functioning of markets and services

Co-shaping international developments

2023  
ANNUAL REPORT  
Summary of actions





# ANNUAL REPORT

## Summary of actions

This publication is a summary of EETT's actions and initiatives for the period from January 1 to December 31, 2023.

Digital edition



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. EETT's operation is governed by Laws 4070/2012 (Government Gazette 82/A/2012) and 4727/2020 (Government Gazette 184/A/2020).

EETT regulates, supervises and monitors:

- The electronic communications market, which is primarily dominated by companies/operators 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.

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

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92

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.

EET starts operating.

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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).

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.

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00



## Important milestones in the operation and development of EETT

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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.

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.

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EETT's competences are extended, as provided for by Law 4070/2012, regarding managing of 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. According to Law 4053/2012, EETT competences are updated regarding the processes for awarding, securing, financing and compensating the Universal Service (US) in postal services, as well as the regulation and supervision of the postal market.

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 4727/2020 replaces most of Law 4070/2012.

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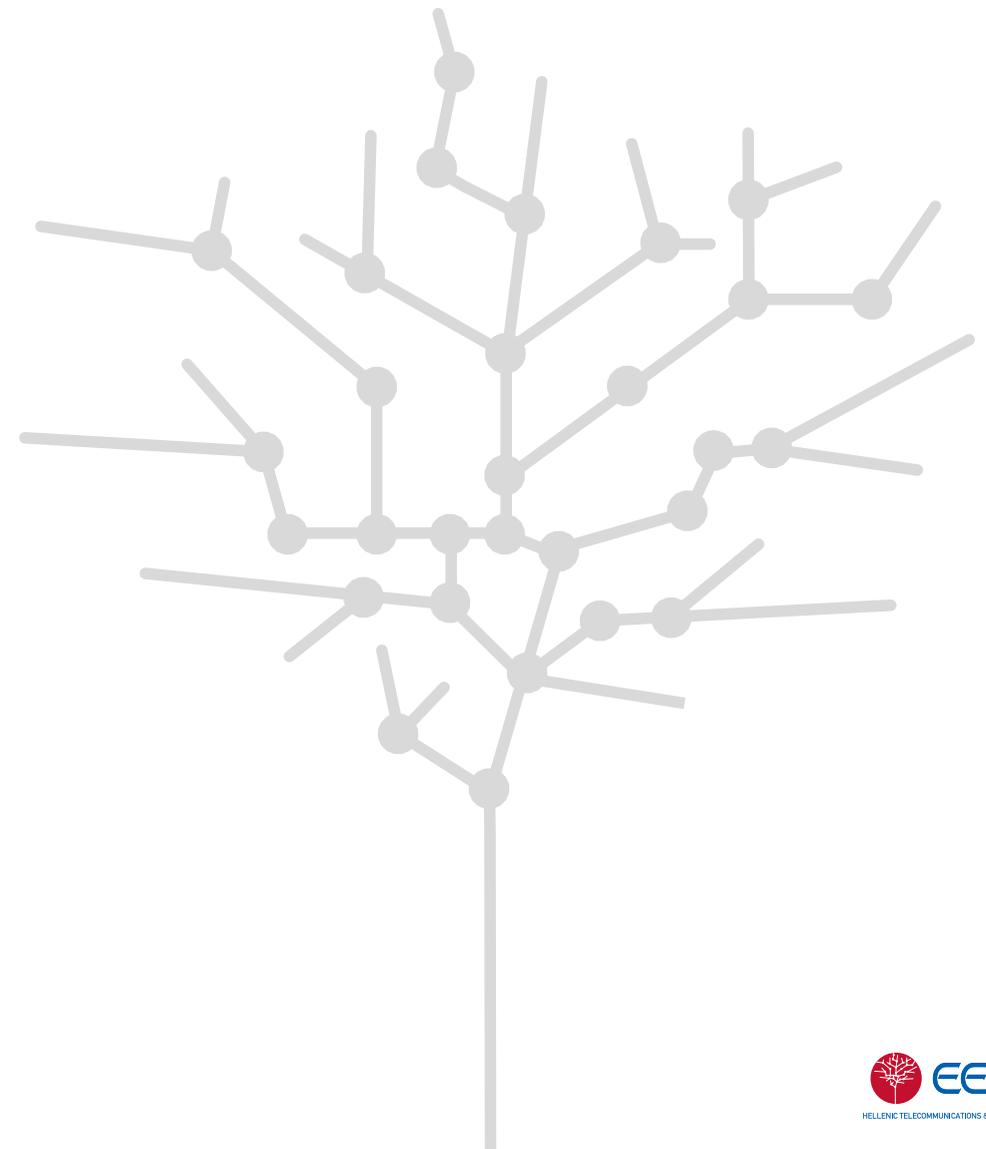


## Plenary composition

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

- The President and also 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



**Professor  
Konstantinos Masselos**  
President



**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  
Aristeia Sinanioti-Maroudi**  
Member



# Summary of actions

## A. Plenary meetings

In 2023, the EETT Plenary adopted a total of 711 decisions within 36 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.

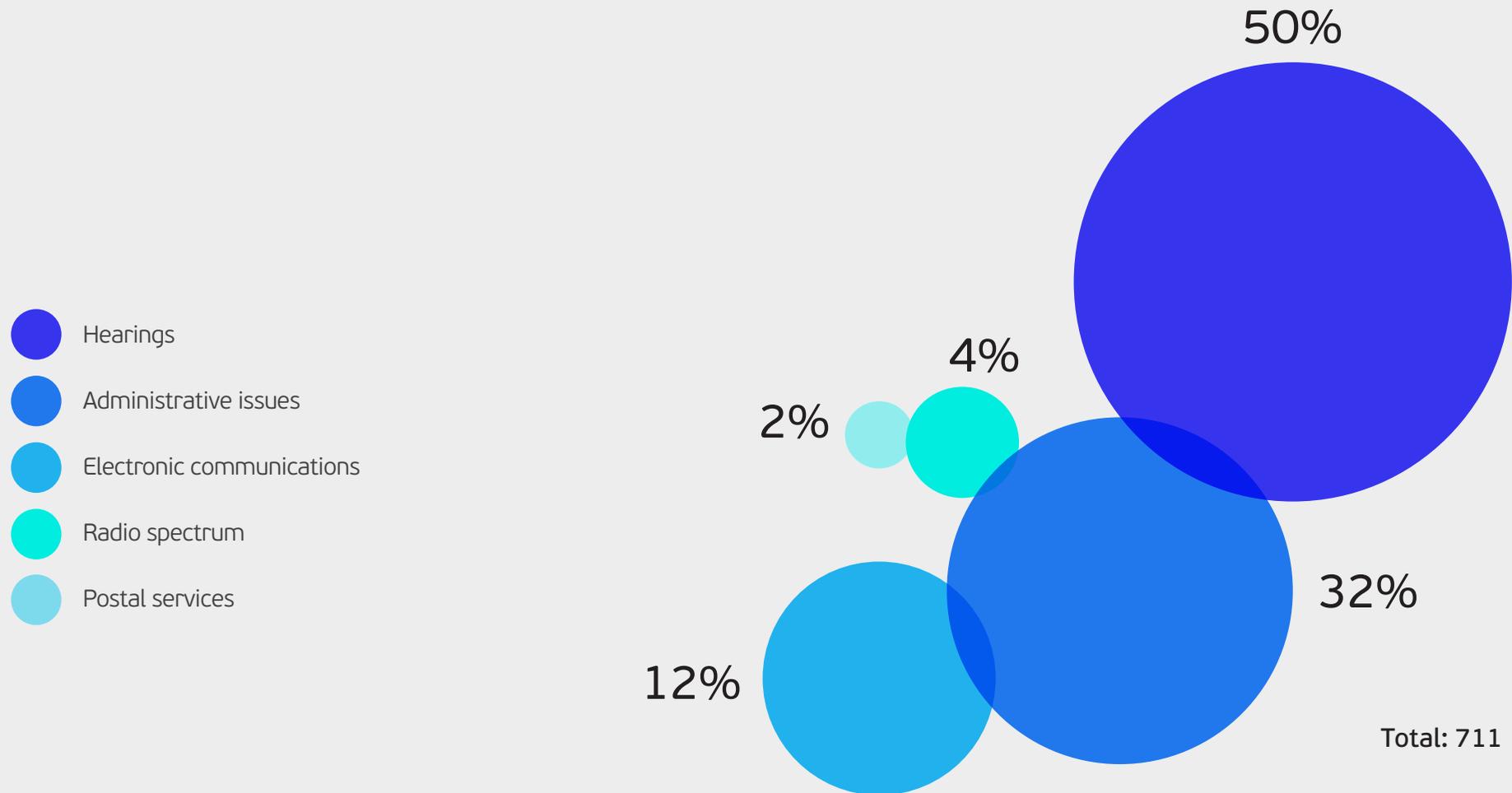
Decisions relating to regulatory acts are published in the Official Journal of the Hellenic Republic (Government Gazette). Also, decisions are posted, where required, on the governmental website «Δι@ύγεια».

Diagram 1 illustrates the categorization of Plenary decisions.



## Diagram 1

Categorization of EETT Plenary decisions, 2023



Source: EETT



## B. Actions by sector

### I. The citizen at the centre of EETT actions

*Complaints handling:* 9,326 consumer complaints were handled, through the electronic complaint handling system, about electronic communications and postal services.

*Terminal equipment selection:* As of 1 October 2023, the users of electronic communications services will be able to choose the terminal equipment (router) for their local private network.

*Equal access to electronic communications services for people with disabilities:* A Regulation was issued to ensure equal access to electronic communications services for people with disabilities.

*Blocking of websites with illegal content:* Inspections were carried out in order to identify websites that were distributing illegal content.

*Prohibition on placing radio equipment on the market:* Devices that did not meet the requirements regarding the health and safety of the population,

as well as the prevention of harmful interferences, have been withdrawn from the market.

*Approval of cluster mailbox installations:* The installation of 875 cluster mailboxes was approved in order to serve 3,938 residents in the territory.

*Collection of data regarding the place of postal items delivery:* Important data were collected, in the context of store inspections, regarding the place where postal items were delivered to users.

*Survey on unlimited data plans:* A nationwide consumer survey was conducted on unlimited mobile data plans.

### II. Reliable and affordable communications for everyone

*Public Consultation Regulation:* A new Regulation has been issued regarding public consultations process on matters related to electronic communications and postal services markets.

#### Electronic communications

*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.

*Universal Service:* NOVA was designated as Universal Service Provider (USP). A Regulation was issued determining the criteria for calculating the Universal Service Net Cost and assessing a possible unfair burden on the provider. The Universal Service Net Cost for the period 2017-2019 was calculated, once the related audits were completed.

*Open Internet:* The review of the National Open Internet Regulation has been completed. The Open Internet Report including EETT's actions and the main conclusions from the implementation of Regulation (EU) 2015/2120 and the National Open Internet Regulation from 1 May 2022 to 30 April 2023 was published.

*Quality indicators:* The quality indicators for each semester of 2023 were published. The indicators were about interconnection capacity, as well as response time for initial connection, faults repair on fixed connections, subscriber complaints resolution and waiting time for subscribers service telephone numbers and directory enquiry services.

*Domain Names:* The assigned domain names with extension [.gr] and [.ελ]



increased by 32,852, resulting to a rise of approximately 6%, compared to 2022. Since 2004, the assignments rate has remained positive. The total number of assigned domain names by the end of 2023 was 591,710.

**Number portability:** A total of 1,019,300 numbers were ported, recording an increase of 37%, compared to 2022.

**Trust Services:** The EETT registry of trust services providers located in Greece was updated and the review of providers' Compliance Assessment Reports was completed.

**General Authorization Regulation:** The new General Authorization Regulation was amended, in order for the described services to be compatible with those included in the model registration statement of the Body of European Regulators for Electronic Communications (BEREC) for the provision of electronic communications activities under General Authorization. Also, a public consultation was held on the amendment of the Regulation for providing the possibility of indexation in the contracts of operators, based on the Consumer Price Index (CPI), and the imposition of an obligation on operators to communicate with EETT for consumer complaints exclusively through an online platform.

**Determination of publishers' fees from information society service providers:** The task of supporting EETT for the completion of the project was assigned to an independent body.

## Radio spectrum

**Revision of the radio spectrum terms of use Regulation:** Two revisions of the Regulation on the radio spectrum terms of use were carried out, incorporating into the regulatory framework new provisions that emerged, aiming at the effective, efficient and coordinated use of radio spectrum.

**Spectrum Management System:** The development and implementation of the Spectrum Management System has been completed. The system is interoperable with the Electronic Application Submission System for antenna constructions, forming a fully digital radio spectrum rights and antenna constructions licensing framework. The Regulation on the system's operation was issued as well.

**Granting of radio spectrum rights of use:** New rights of radio spectrum use were granted, as well as existing ones were modified, for fixed service, mobile communications networks and terrestrial satellite station services.

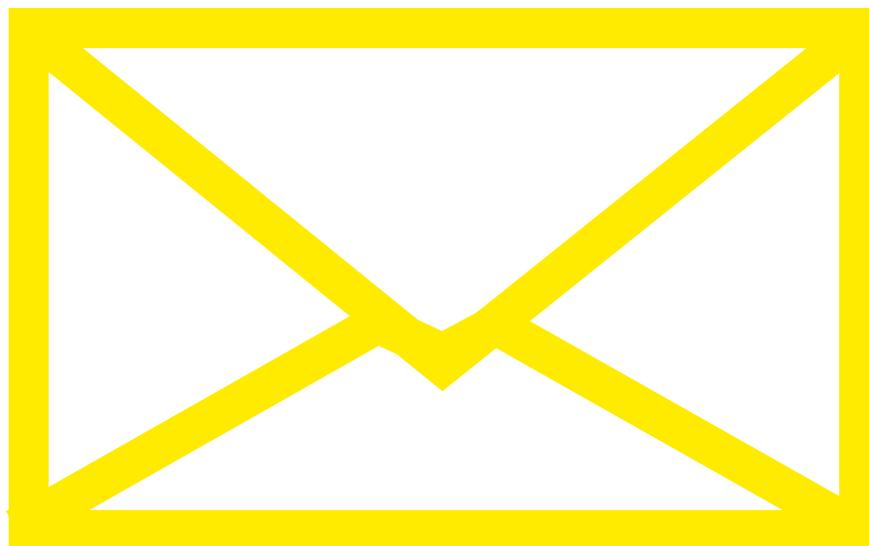


*Licensing of antenna constructions:* New antenna constructions licences were granted and existing ones were amended, through the Electronic Application Submission System for antenna constructions. Declaratory acts were issued for the inclusion of antenna subsumption of land-based antenna constructions under the scope of Environmental Commitment Standards.

*Alert system for spectrum management:* A total of 32 urgent requests from the Ministry of Digital Governance were handled immediately, through the alert system, concerning the temporary allocation of available frequencies.

### Postal services

*Universal Service Net Cost verification:* The verification report of the Universal Service Net Cost of the USP for the year 2021 was submitted to the Minister of Digital Governance. Also, a forecast for the Universal Service Net Cost for the year 2023 was submitted.



*Universal Service quality measurement:* The quality measurement of Universal Service (US) for domestic mail was continued. In addition to 1<sup>st</sup> priority, measurements for 2<sup>nd</sup> priority domestic mail were also carried out in 2023.

*Universal Service Provider cost accounting audit:* The extension of the validity of the approved cost accounting system was approved.

*Universal Service Provider pricing policy:* The adjusted prices for letter mail and parcel services were approved.

## III. Creating a favorable environment for investments

### Electronic communications

*Market analysis:* Decisions regarding analysis and regulation of central and local access markets and the deregulation of the voice call termination market were issued.

#### *Cost accounting audits-Price audits:*

- A decision was issued on the annual cost accounting audit of OTE and the determination of the wholesale prices of regulated products and services for 2021, based on 2019 data. Also, the process for the 2022 cost accounting audit has been commenced.
- The audit and update of the techno-economic model of DIGEA for 2023, based on 2022 data, have been completed. The above audit will be carried out on an annual basis from now on.
- The audit of accounting separation reports for the mobile operators has been completed.



- The wholesale access prices submitted by OTE RURAL NORTH, RURAL CONNECT and OTE RURAL SOUTH were approved.

*Audit on OTE bundled offers:* Approximately 100 bundled offers submitted by OTE were audited before launching into the market and there was no margin squeeze. The flagship bundled offers of the Significant Market Power (SMP) operator were defined for the first time and after being audited, based on ex post data, it was found that there was no margin squeeze.

*OTE Leased Lines offers audit:* The data for 867 retail offers for Leased Lines services submitted by OTE were audited and no margin squeeze was found.

#### *Techno-economic Bottom-up model:*

- The update of the Bottom-up LRIC+ cost model for the calculation of access prices to new generation and copper networks, based on current costs, has been commenced.
- The decision on the extended model for the access prices calculation to new generation and copper networks was issued, following notification to the European Commission, BEREC and the National Regulatory Authorities (NRA) of the other member states. The model calculates the access prices for two additional wholesale Leased Lines services, of type L2 WAP.
- The process of adapting the existing model for the calculation of access prices to new generation and copper networks has been commenced, with the aim of defining the monthly access fee to the Floor Box of buildings with internal fiber optic cabling infrastructure.

#### *Wholesale Leased Lines:*

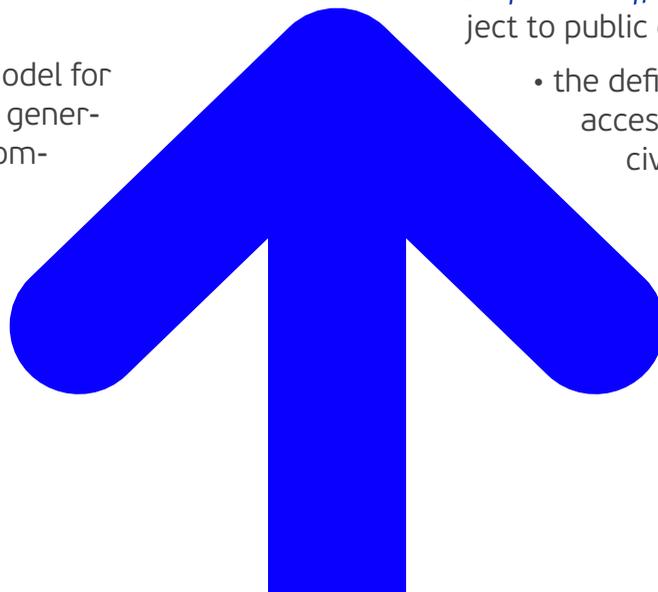
- The final methodological principles and modelling parameters of the techno-economic Bottom-up LRIC+ model for prices calculation of the products of the wholesale Leased Lines markets have been subject to public consultation. The extended model has been notified to the European Commission, BEREC and the NRA of the other member states.
- A public consultation was held on the parameters and the methodology for the calculation of the WACC, which will be used in the Bottom-up LRIC+ techno-economic model for the calculation of prices of the products of the wholesale Leased Lines markets.

*OTE FTTH volume discounts:* The proposal submitted by OTE for approval regarding the provision of volume discounts, under conditions, at wholesale level for VPU/VLU services, has been subject to public consultation.

*New co-location Regulation:* A new Regulation has been issued setting out the terms, conditions and processes for co-location and sharing between operators of public electronic communications networks and associated facilities.

*OTE reference offers:* OTE reference offers have been subject to public consultation for:

- the definition of the terms and conditions of access to passive/physical infrastructure and civil works of the access network,
- the wholesale central access services,
- the wholesale local access services.





*Amendment of the access and interconnection Regulation:* A public consultation was held on the new access and interconnection Regulation regarding the designation of the first concentration point and then the proposed decision was notified to the European Commission. The notification procedure was completed without any comments from the Commission.

### Postal services

*Update of the regulatory framework:* The proposed new regulatory framework for the provision of postal services under a General Authorization and Individual Licence has been subject to public consultation.

*Cross-border parcel delivery services:* Data was collected on the invoices for cross-border parcel delivery services under Regulation (EU) 2018/644.

*Automated parcel lockers:* A public consultation was conducted on the use of automated parcel lockers.

## IV. Ensuring the proper functioning of markets and services

### Supervisory and monitoring actions

#### Inspections

##### Electronic Communications:

*Conducting inspections on operators' premises:* A total of 1,181 inspections were carried out on operators, regarding the compliance with the obligations arising from the General Authorization Regulation, the Code of Conduct for the provision of electronic communications services, the European and National Open Internet Regulation, the Code of Conduct for the provision of Premium Rate Services (PRS) and regarding the processes for the deployment of new generation networks.

*Alert system:* The access to 797 Internet Protocol (IP) addresses was blocked because of illegal content transmission.

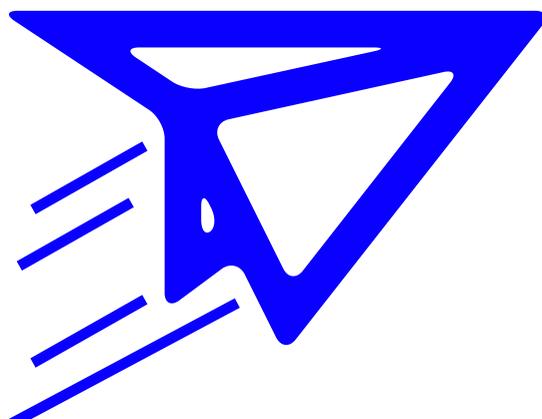
#### Radio spectrum

*Spectrum Monitoring System:* The development of the Spectrum Monitoring System was continued. EETT, by the

system, is able to continuously and remotely monitor radio spectrum use and detect interferences. Furthermore, EETT's access to hard-to-reach areas is facilitated by the use of portable equipment, improving therefore the response speed to incidents in the Greek territory.

##### Monitoring actions:

- 922 either ex officio or upon requests/complaints inspections on the proper use of radio spectrum were carried out for issues that, inter alia, were related to link emissions and interferences in the fixed service, interferences in the radio spectrum assigned to mobile operators, satellite services, antenna systems of mobile and wireless networks. In addition, inspections were carried out on interferences and legality audit of radio amateur stations, legality audit and compliance with technical broadcast specifications, illegal broadcasting emissions and radio/television station installations, inspections to cease illegal broadcasts, as well as investigations on housing television coverage.
- 102 inspections were carried out on interferences to state networks related to human life protection, as well as public and national security.





- 18 radio equipment devices were sampled to verify their compliance with the legislation. Also, the audits that had started in 2022, in the context of the JAHARP 2020 action, have been completed.

**Alert system:** Through the alert system, on a 24/7 basis, EETT ensured the rapid resolution of interference problems in wireless networks related to human life and safety (Civil Aviation Authority, Hellenic Police, Fire Brigade, National Emergency Aid Center etc.).

### Postal services

**Monitoring actions:** A total of 127 on-site inspections were carried out at the headquarters of postal service operators, at a national level, in order to investigate compliance with the regulatory framework. Also, 102 audits were carried out in stores of the network of licensed operators regarding their compliance with the Code of Conduct for the provision of postal services and the Charter of Obligations towards Consumer.

**Provision of postal services by online platforms:** Platforms providing postal services have voluntarily registered in the eRegistry, following a recommendation by EETT.

**Alert system:** The alert system for postal services has been launched. In this con-

text, EETT handled seven incidents related to illegal trade.

**Cooperation with bodies:** Issues related to postal services were investigated in cooperation with public bodies.

### Investigation of agreements based on competition law

**Mobile communications networks sharing:** The investigation of the amended agreement that had been notified by the operators NOVA and VODAFONE on the Radio Access Network (RAN) sharing in part of the urban centres of the territory, in 4G and 5G technologies, has been completed<sup>1</sup>. EETT allowed the implementation of the agreement, based on the data provided by the two operators, regarding the degree of network deployment in urban/semi-urban centres, given that no violation of article 1 of Law 3959/2011 was detected. EETT also reserved for the future development of the agreement and its possible amendment, while it provided for the examination of compliance with the regulatory obligations of the two operators, in a separate process, under Law 4727/2020.

### Market monitoring

**Evaluation of the Greek mobile telephony market:** A comparative evaluation of the

1. According to Article 1 of Law 3959/2011 (Government Gazette 93/A/20-04-2011) and 101 of the Treaty on the Functioning of the European Union (TFEU).



Greek mobile telephony market for the period 2017-2023 (first semester) was carried out, based on economic indicators and in relation to selected EU member states.

*Study on the use of unlimited data tariff plans:* A study was conducted in order to investigate the conditions of competition in the market of unlimited data tariff plans.

*Study on broadband prices in Europe:* EETT participated in the European Commission's study on the retail prices of the offered fixed and mobile broadband plans.

*EETT as an official body of the Hellenic Statistical System:* The Annual Statistical Work Programme and the Release Calendar for the year 2024 were prepared, in the context of EETT's statistical obligations as a member of the Hellenic Statistical System. Also, the Annual Assessment Report for 2022 was completed.

*Market Monitoring System:* The first stage of implementing Business Intelligence (BI) has been completed and the second stage has been commenced.

*Price Observatory:* The database for the extraction of Telecommunications Tariff Plans Indicators published by EETT on an annual basis was used in order to monitor the evolution of prices and characteristics of telecommunication tariff plans.

## V. Co-shaping international developments

In 2023, the President of EETT, Professor Konstantinos Masselos, served as BEREC Chair. EETT made a decisive contribution to the implementation of the BEREC Work Programme 2023. Also, EETT Vice President for Postal Services, Dr Spyros Pantelis, has served as Vice-Chair of the European Regulators Group for Postal Services (ERGP) in 2023. In this context, ERGP implemented the first annual programme of the Medium-Term Strategy 2023-2025.

EETT, with its expertise, responds to current challenges and contributes to the work of European/international bodies by having a coordinating or participating role. In this light, EETT co-shapes developments, intervening in key issues.



# KEY DATA



## Plenary meetings

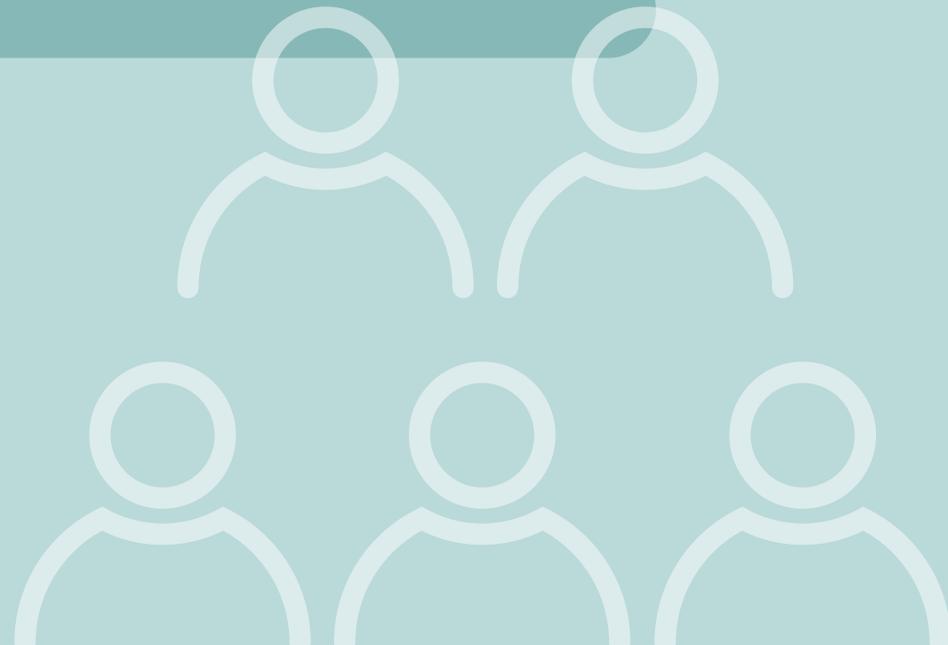
711 Plenary decisions

358 decisions on hearings\*

331 decisions imposing administrative penalties\*

191 hearings

\*Including decisions on hearings held in previous years.





## Consumer issues

9,326 consumer complaints

8,338  on electronic communications

988  on postal services





## Electronic communications

**32,852** assigned domain names

**107** processing of operators' requests for numbering resources

**106** processing of operators' requests:

43  General Authorization

38  General Authorization/services amendments

25  cessation of services provision

**23** approvals of new domain name registrars' requests



# Electronic communications

## Monitoring actions

**1,181** inspections on operators' premises for the following issues:

800  on operators' obligations towards consumers

223  on the deployment of new generation networks

158  on obligations regarding EETT registry

**797** cases of access blocking to IP addresses due to illegal content transmission

**59** cases of domain names deletion due to illegal trade and/or trafficking of goods



## Radio spectrum

**2,328** granted rights of spectrum use for fixed service

**1,249** processed declarations on the modification of antenna constructions

**383** granted authorizations/modifications of antenna constructions

**370** processed declarations of Low Electromagnetic and Environmental Nuisance Antennas Constructions

**141** decisions on mobile networks, including Private Mobile Radio (PMR) networks



# Radio spectrum

## Monitoring actions

**1,042** inspections for the following cases:

- 405  on broadcasting services
- 254  on mobile and wireless networks antenna constructions
- 102  on interferences in state networks
- 96  on mobile communications service interferences
- 77  on link emissions and fixed service interferences
- 62  on interferences and legality audit in amateur radio stations
- 28  on satellite services
- 18  on radio equipment devices





## Postal services

**875** cluster mailboxes approved for installation  
in order to serve 3,938 residents

**538** processing of operators' requests

- ↓ 426 General Authorization amendments (incl. network amendments)
- ↓ 83 entries for General Authorization
- ↓ 27 deregistrations of operators (ex officio or upon request)
- ↓ 2 entries for Individual Licence

## Monitoring actions

**229** Inspection of operators

- ↓ 127 at headquarters
- ↓ 102 in networks of licensed operators



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