

4 ANNUAL REPORT 2024



EETT

HELLENIC TELECOMMUNICATIONS & POST COMMISSION

ANNUAL REPORT 2024

Summary of actions

This publication is a summary of EETT's actions and initiatives for the period from January 1 to December 31, 2024.



DIGITAL EDITION

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About EETT

The Hellenic Telecommunications and Post Commission (EETT) is an independent authority with administrative and financial autonomy. It constitutes the National Regulatory Authority (NRA) for the electronic communications and postal services markets, in which it also exercises exclusively all the competences of a competition authority. EETT has been designated as the Digital Services Coordinator (DSC) of Greece, having also other competences related to digital markets.

EETT:

- regulates, supervises and monitors:
 - the electronic communications market, in which companies/operators of fixed and/or mobile services, wireless communications and the Internet are primarily active,
 - the use of the radio frequency spectrum, having, inter alia, competence to grant, revoke or restrict the rights of use of radio frequencies and to license antenna constructions, as well as regarding matters related to the conditions for placing on the market and use of radio equipment,
 - the postal services market, in which traditional post and courier operators are active.

- exercises exclusively all the powers of the Competition Authority with all relevant powers and monitoring rights for the implementation of the national and European Union (EU) competition legislation in the electronic communications and postal services markets. In this context, EETT ensures the smooth functioning of the markets, effectively addressing the risks of competition distortion and safeguarding users' rights.
- is the Digital Services Coordinator. Within this framework, EETT enforces the compliance of intermediary digital services providers, who are active in Greece, with the Digital Services Act (DSA) and supervises its implementation. It also ensures coordination at national level and contributes to the effective and consistent implementation of the Act in the EU.
- resolves disputes between intellectual property rights holders and digital platforms, by issuing a non-binding opinion in the event of failure in negotiations between them to determine the remuneration paid to publishers. In addition, EETT issues a Regulation setting out the criteria for the calculation of publishers' remuneration by information society service providers.
- is the competent authority for monitoring and enforcing compliance with certain provisions of the EU Regulation on combating the dissemination of terrorist content on the Internet.
- has competences regarding the process for blocking access to illegal transmissions via digital platforms.

EETT's operation is governed by Articles 6 to 11 of Law 4070/2012 (Government Gazette-GG 82/A/2012) and its powers by Law 4070/2012 (GG 82/A/2012), Law 4053/2012 (GG 44/A/2012), Law 4463/2017 (GG 42/A/2017), Law 4727/2020 (GG 184/A/2020), Law 4994/2022 (GG 215/A/2022), Law 4996/2022 (GG 218/A/2022), Law 5067/2023 (GG 189/A/2023) and Law 5099/2024 (GG 48/A/2024).

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 frequency 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.

2012

EETT’s competences are extended, as provided for by Law 4070/2012, regarding the management of the radio frequency 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.

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 4727/2020 replaces most of Law 4070/2012.

2024

Pursuant to Law 5099/2024, EETT has been designated as the Digital Services Coordinator (DSC) of Greece within the framework of the Digital Services Act, expanding its competences.

The Plenary

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 2024

**Professor
Konstantinos Masselos**
President



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



**Professor
Antonios Gasteratos**
Member



Dr Spyros Pantelis
Vice President
for Postal Services



**Professor
George Dimitrakopoulos**
Member



**Professor
Athanasios Panagopoulos**
Member



**Professor
Aristea Sinanioti-Maroudi**
Member



Angelos-Zikos Peponis
Member



Dr Petros Potikas
Member



Summary of actions

I. Protecting digital services users

Designation of EETT as Digital Services Coordinator (DSC): EETT has been designated as the DSC, in the framework of the Digital Services Act-DSA (Regulation (EU) 2022/2065) and Law 5099/2024. The Act aims to protect users of intermediary digital services from illegal and harmful content, thereby more effectively safeguarding their fundamental rights online.

Provision of information for users and providers: A special section has been created on EETT's website with information for providers and users of intermediary digital services. EETT received 43 complaints from users of digital services.

Registry of intermediary digital services providers: The implementation of EETT's Regulation on the registry of intermediary digital services providers has been commenced and the registry is now operational.

EU-level actions: The European Board for Digital Services was established, as well as eight working groups in which EETT participates, examining specific issues and submitting proposals and reports.

Measures concerning DSA bodies: Processes were established on the following issues.

- Designation of trusted flaggers status. This status was granted to three bodies.
- Certification of Out-of-Court Dispute Settlement (ODS) bodies.

Contribution to preventing dissemination of terrorist content online: Following the Regulation issued on the registry of intermediary digital services providers, the process of keeping a record regarding removal orders, in the context of preventing dissemination of terrorist content online, has been commenced. EETT published the relevant Transparency Report on its website, as well as that of the competent prosecutor's.

II. The citizen at the centre of EETT actions

Consumer protection: A total of 8,599 consumer complaints related to electronic communications and postal services were handled through the Electronic Complaints Management System.

Criteria for locating 112 callers: A public consultation was conducted on determining the criteria on the accuracy and reliability regarding location information of the callers of emergency number 112.

Blocking of websites with illegal content: A total of 30 domain names were blocked through which illegal trade and/or trafficking of goods was carried out. EETT's actions were subsequent to relevant decisions by the Interagency for Market Control of the Ministry of Development.

Application for competition issues: An application was developed, in cooperation with an external consultant, through which EETT seeks to provide citizens and businesses with a contact point to report anti-competitive practices in the electronic communications and postal services markets. The aim is to promote transparency and address risks of competition distortion, as well as to safeguard users' rights.

Open Internet: The new National Open Internet Regulation was issued. Key amendments included the prohibition of differential pricing for content on mobile networks, modifications of the mobile speed maps and complaint-handling procedures regarding discrepancies between actual and contractual speeds, as well as the obligation of providing pre-contractual information to users on actual speeds in fixed and mobile networks.

Quality indicators: The quality indicators for each semester of 2024 have been published. These indicators are calculated by the operators and published on EETT's website.

Price Observatory: The updating of the Price Observatory for telecommunications and postal services continued, incorporating changes in the market structure.

Withdrawal of radio equipment devices: A total of 13 devices were withdrawn from the market for failing to comply with requirements mainly related to public health and safety limits, as well as the proper use of spectrum.

Approval of cluster mailboxes installation: The installation of 150 cluster mailboxes was approved in order to serve 3,304 households/companies in areas lacking adequate street naming or numbering.

Investigation into parcel collection points: In the context of on-site inspections at postal stores, the collection of statistical data on the reasons for parcel collection at stores was continued. In the same context, an on-site survey was conducted with users-customers of these stores, based on a specific questionnaire.

Guidelines for receiving online purchases: Users were informed about issues related to receiving, via postal services operators, products from online purchases during the sales period and the holiday season.

III. Reliable and affordable communications for everyone

Electronic communications

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. The process through EETT's assignments proceeded at a slower pace, because of the acceleration of the fiber networks rollout under the operators' commercial plans.
- *Regulation for the transition to next generation networks:* The regulatory framework specifying operators' obligations regarding the migration to next generation networks has embarked. In particular, the obligations are related to the migration process, the operators' binding business plans, the deployment of the networks and the definition of indicators.

Domain names

- *Regulation revision:* A new Regulation was issued in order to improve the management and assignment process of [.gr] or [.ελ], domain names and the procedure under which registrars operate.
- *Domain name registration:* The total number of [.gr] and [.ελ] domain names increased by 25,399 (4.3% increase) compared to 2023.

Numbering resources

- *Amendment of the Regulation on the management and assignment of numbering resources:* A draft amendment has been put to public consultation dealing with the modification of the process for the allocation of non-geographic numbers and the use of Mobile Network Code (MNC) for private networks.
- *Number portability:* It has been 20 years since the launch of number portability, with over 16.7 million numbers ported during this time.

Trust services: EETT registry of trust services operators located in Greece was updated. Seven compliance assessment reports were issued, and on-site inspections were carried out at registered trust service operators.

Determination of publishers' fees from information society service operators: A draft Regulation specifying the criteria for determining publishers' remuneration fees by information society service operators has been put to public consultation.

Radio frequency spectrum

Revision of the radio spectrum terms of use Regulation: The Regulation on the radio spectrum terms of use was revised, incorporating new provisions in the regulatory framework, aiming at ensuring the efficient, effective and coordinated use of the spectrum.

Spectrum Management System: The Spectrum Management System, a fully automated and specialized information system that supports EETT in managing the radio frequency spectrum and the granting of usage rights, was put into operation.

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

Licensing of antenna construction: 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 64 urgent requests of the Ministry of Digital Governance for the allocation of available frequencies were immediately handled through the alert system.

Postal services

Universal Service

- **Cost accounting audits:** The validity of the approved cost accounting system of the Universal Service Provider-USP (ELTA) was extended.
- **Universal Service Net Cost:** The verification report of the Universal Service Net Cost of the USP for the year

2022 was submitted to the Minister of Digital Governance. A forecast of the amount of the Universal Service Net Cost for the year 2024 was also submitted.

Quality measurements

- **Domestic mail:** The Universal Service (US) quality measurements for domestic A and B priority mail services were carried out for the year 2024.
- **International mail:** The quality measurements of inbound/outbound international A priority mail carried out by the International Post Corporation (IPC) were continued.

IV. Creating a favorable environment for investments

Electronic communications

Costing and accounting separation: A decision was issued redefining the methodology for the implementation of the regulatory obligations of price control, costing and accounting separation of the operator with Significant Market Power (SMP). Because of this, the processes have been simplified and the required time for cost auditing has been reduced.

Cost accounting audits – Pricing audits

- **OTE cost accounting audit:** A decision was issued regarding the annual cost accounting audit of OTE. The regulated wholesale prices of OTE's products and services were determined, based on the results of this audit.

- **DIGEA cost accounting audit:** The audit and update of the techno-economic model of DIGEA for 2024 have been completed.
- **Clawback mechanism for network operators in rural areas:** The non-activation of the clawback mechanism was approved for the years 2019, 2020 and 2021.
- **Audit of OTE bundled offers:** The flagship bundled offers of the SMP operator were defined for both semesters of 2023 and the first semester of 2024, and were also tested for margin squeeze.

Techno-economic Bottom-up models: Next generation networks

- **L2 WAP Leased Lines product prices:** The updated prices for Symmetric Virtual Optical (SVO) fiber and copper services were put to public consultation.
- **Determination of prices for new Fiber-to-the-Home (FTTH) products:** The principles and methodology of the NGA Bottom-up LRIC+ model for the calculation of access prices in next generation networks, in line with the Commission Recommendation on the promotion of Gigabit connectivity, have been defined. The principles and methodology are to be put to public consultation.
- **Determination of prices for co-location and related facilities:** The co-location product prices calculation model and the adapted NGA Bottom-up techno-economic model for determining the prices of BRAS or DSLAM type OCS/SCS products were approved.

Wholesale Leased Lines: The Bottom-up LRIC+ model for the calculation of wholesale Leased Lines market product prices was approved.

OTE FTTH volume discounts: OTE's updated proposal for the provision of volume discounts with wholesale level commitments for Virtual Partial Unbundling (VPU)/Virtual Local Unbundling (VLU) FTTH services was approved.

Definition of pricing principles for access to existing infrastructure: A Regulation was issued regarding the principles and methodology for the calculation of charges for the provision of access to existing physical infrastructure.

VLU: A draft amendment of EETT's decision on the technical specifications and minimum characteristics of the wholesale VLU product was formulated. The draft was submitted to public consultation and was discussed in the context of a working group with the participation of operators.

OTE reference offers

- **Access to physical infrastructure and technical works:** An updated OTE proposal for the reference offer on access to physical infrastructure and technical works was put to public consultation.
- **Wholesale central access:** A decision was issued on the reference offer for wholesale central access services.

- **Wholesale local access:** A decision was issued on OTE's modified wholesale local access reference offer for the introduction of new FTTH services speeds and the determination of their prices by EETT's NGA Bottom-up techno-economic model.

Sustainability study in Information and Communication Technologies: A feasibility study was conducted for Information and Communication Technologies (ICT) in the Greek market. This action is part of EETT's initiatives to promote the development, competitiveness and proper functioning of regulated markets and is in line with the European Commission's objectives.

Postal services

Update of the regulatory framework

- **General Authorization and Individual Licences Regulation:** A new Regulation on General Authorization and Individual Licences and conditions for the provision of postal services has been issued. The Regulation ensures the rights of users, the provision of quality services and the proper functioning of the market.
- **Regulation on the examination of complaints and dispute resolution:** A new Regulation on handling user complaints and resolving disputes between users and operators or among operators has been issued. The framework for protecting postal services users is strengthened and processes are automated to serve them more efficiently.

Cross-border parcel and letter delivery services: Data on tariffs for cross-border parcel delivery services were col-

lected and submitted to the European Commission for assessment, in line with Regulation (EU) 2018/644.

Merger of Hellenic Post (ELTA) and ELTA Courier:

Issues were examined in the context of the merger by absorption of ELTA Courier SA by ELTA, with the aim of ensuring the uninterrupted provision of postal services by the newly integrated entity.

V. Ensuring the proper functioning of markets and services

Supervisory and monitoring actions

Electronic communications

Inspections at operators' premises: A total of 1,102 inspections were carried out on operators regarding compliance with their obligations towards the consumers, provision of wholesale services, the procedures for the deployment of new generation networks, the EETT registry.

Alert system: Access to 798 Internet Protocol (IP) addresses was blocked because of illegal content transmission. EETT received, in this context, 272 requests, approximately three times more than those of 2023.

Radio frequency spectrum

Surveillance equipment

- The development of the Spectrum Monitoring System was continued. By using the system, EETT is able to continuously and remotely monitor radio frequency spectrum use and detect interferences, even in hard-

to-reach areas, improving response speed to incidents throughout the Greek territory.

- The implementation of the Satellite communications Spectrum Monitoring System (SSMS) continued. It is an advanced system that will support EETT in the supervision of the radio frequency spectrum for satellite communications and orbital positions.

Inspections

- 1,086 inspections on the proper use of the radio frequency spectrum were carried out, ex officio or upon requests/complaints on issues related to, inter alia, link emissions and interferences in the fixed service, interferences in the radio spectrum assigned to mobile network operators, satellite services, mobile and wireless communication antenna systems of mobile and wireless networks, interferences and legality audit on amateur radio stations, legality audit and compliance with technical broadcast specifications, illegal broadcasting emissions and broadcasting radio-television station installations, inspections to cease illegal broadcasts, as well as inspection of settlement television signal coverage.
- 194 inspections were conducted concerning interferences in state services networks related to the protection of human life, public and national security.

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

Radio equipment: Audits were carried out on 10 radio equipment products. Technical reports have been drawn up and the economic bodies responsible for the distribution of products have been informed. In addition, 15 radio equipment products were sent for laboratory testing, under the EU's Joint Market Surveillance Action on Harmonised Products (JAHARP), to determine the degree of compliance with the legislation.

Postal services

Inspections at postal services operators' headquarters: 119 on-site inspections were carried out at the headquarters of postal services operators to investigate compliance with the regulatory framework.

Inspections at postal operators' stores: 17 on-site inspections were carried out in stores of the network of licensed operators, in order to investigate the degree of compliance with the Code of Conduct for the provision of postal services and the provisions of the Charter of Obligations towards the User-Consumer.

Alert system: The alert system continued to operate, in order for EETT to intervene immediately and ensure postal services operators' compliance with the regulatory framework.

Investigation of postal services provision by on-line platforms: Online platforms were investigated to determine whether they provided postal services without having submitted a declaration for General Authorization to EETT.

Competition case investigation

Investigation of a competition case in the domain names market: An investigation was launched into a complaint regarding abuse of dominant position in the market of [.gr] domain names.

Market monitoring

Price evaluation of electronic communications services

The following studies were carried out in cooperation with independent bodies:

- Comparative evaluation of the Greek mobile and fixed broadband communications market for the period 2018-2023, based on economic indicators and in relation to 11 EU Member States.
- Comparative analysis for 2024 of the fixed and mobile communications markets in relation to five EU Member States.
- Study of the existing distribution/sales channels, digital and non-digital, provided by the electronic communications operators. Possible differences between the prices offered were investigated, as well as the degree of transparency regarding the terms of service provision, and the communication of information to users about new services/products and related prices.

EETT also participated in the study "Mobile and Fixed Broadband Prices in Europe 2024" which is carried out annually by the European Commission. The study presents retail prices of broadband packages for both fixed and mobile telephony.

Monitoring of the Radio Access Network (RAN)

Sharing agreement: Recommendations were sent to NOVA and VODAFONE regarding the modification of the processes for the exchange of information, in the context of the monitoring of the agreement for the RAN Sharing.

EETT as an official body of the Hellenic Statistical System: The following actions were implemented within the framework of EETT's statistical obligations as an official body of the Hellenic Statistical System:

- The Annual Statistical Work Programme and the Calendar of Announcements for the year 2025 have been drawn up.
- The Annual Evaluation Report for 2023 has been completed.
- Information has been sent to the Hellenic Statistical Authority for the preparation of the Hellenic Statistical Programme 2026-2028.

Market Monitoring System: Multiple tests have been carried out so that, after the necessary improvements, operators will be able to use the trial version of the application.

VI. Co-shaping international developments

In 2024, the President of EETT, Professor Konstantinos Masselos, served as Vice-Chair of the Body of European Regulators for Electronic Communications (BEREC). EETT contributed to the implementation of BEREC Work Programme 2024. In addition, EETT Vice President for Postal Services, Dr Spyros Pantelis, has also served as Vice-Chair of the European Regulators Group for Postal Services (ERGP) during 2024. In this context, ERGP implemented the second annual programme of the Medium-Term Strategy 2023-2025. Also, EETT organized the 3rd International Postal Regulatory Workshop.

Furthermore, EETT, through its coordinating or participating role, contributed to the work of other European and international bodies. In this regard, EETT played a decisive role in policy-making and in shaping the regulatory framework in the fields of electronic communications, radio frequency spectrum and postal services, as well as competition and digital services.

EETT responds to the current challenges of the international environment by leveraging its expertise and accumulated experience. In this regard, EETT intervenes on key issues and contributes to shaping the developments, by enhancing cooperation and the formulation of common strategies.

Key figures 2024

Plenary Sessions



Digital Services



Electronic communications

617,109

assigned domain names

7,361

consumer complaints

154

cessation of services provision

81

processing of operators' requests for numbering resources

65

amendments of General Authorization/services upon request

33

General Authorization requests

25

approvals of new domain names registrars' requests

Electronic communications

Monitoring actions



Radio frequency spectrum

3,265

granted rights of radio spectrum use
for fixed services

1,223

processed declarations on the
modifications of antenna constructions

665

processed declarations of Low Electromagnetic
and Environmental Nuisance Antenna
Constructions

325

granted authorizations/modifications
of antenna constructions

153

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

Radio frequency spectrum

1,280
inspections

Monitoring actions

343 ON: broadcasting service

316 ON: mobile and wireless networks antenna constructions

194 ON: interferences in state services networks

173 ON: mobile communications service interferences

158 ON: link emissions and fixed service interferences

51 ON: interferences and legality audit in amateur radio stations

25 ON: radio equipment devices

20 ON: satellite service

Postal services

1,238

consumer complaints

567

processed operators' requests

472

General Authorization amendments (including network amendments)

69

entries for General Authorization

25

deregistrations of operators (ex officio or upon request)

1

entry for Individual Licence

150

approvals for the installation of cluster mailboxes, serving 3,304 households/companies

136

Inspections of operators

119

AT:

headquarters

17

AT:

stores

Monitoring actions



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