

Subject: Re: Switching in telecommunications sector - For comments by: 01.07.2010

Ref.Nr.: 1301

Dear Colleagues,

Question 1 (section 3): Are you satisfied with the typical switching time between service providers in the following services:

- a) Fixed telephony;
- b) Mobile telephony;
- c) Internet access;
- d) Bundles.

If not, please offer suggestions on how to speed up the switching time between service providers, whilst ensuring an adequate level of consumer safeguards.

No, There must be preset time limits for switching. We have received complaints by consumers who had signed a contract with a new provider they were disconnected from the net of the old provider and they waited for months to be connected to the new provider's net, which was under construction in the area where the consumers lived. The provider had just "forgot" to inform consumers that his net was under construction. There were other complaints that although consumers had never been connected to the new provider they received bills and they had to undergo a lot of trouble not to pay the money the new provider requested.

Question 2 (section 4): Do you agree that the obstacles to switching identified in the draft report are the most relevant to consumers? If not, please explain why.

YES

Question 3 (section 4): Do you have experience and evidence of any other major obstacles faced by consumers in switching between service providers?

NO

Question 4 (section 4): Among the identified obstacles, which would you rate as the most significant in terms of their adverse impact on switching service providers and why?

Contractual obstacles, irresponsible or aggressive selling methods by the providers, lack of information to consumers.

Question 5 (section 4): What are your views as to whether particular obstacles to switching are more relevant in a specific electronic communications services (e.g. fixed telephony, mobile telephony, Internet access or bundles)?

Bundles are the most problematic

Question 6 (section 5): Do you agree with the best practice principles identified in the report? If not, please explain why.

YES

Question 7 (section 5): Are there any other best practice principles you would like to be identified in this report?

We believe that providers' obligations should be set by legislation, which should also foresee penalties. We must share our experience in this field with you. In

2005, we created a new category in our complaints list for the providers of telecommunication services. The liberalization of the market of telecommunications had been recently done. So:

- **In 2005, we received 498 complaints**
- **In 2006, we received 938 complaints**
- **In 2007, we received 1728 complaints**
- **In 2008, we received 1428 complaints**
- **In 2009, we received 1371 complaints**

In all these years, we had been trying to convince the previous government and the National Regulatory Authority (EETT) that they should pass legislation on the obligations of the providers. There was a long consultation which lasted 2,5 years. Finally, we were disappointed and we issued, in February 2008, a press release focusing on the rapidly increasing number of complaints. In the beginning of July 2008, we issued a press release in which we accused EETT that they did not care for consumers' problems. Their only target was to liberate the market without any rules. This press release made EETT to edit the decision 488/85/2008 entitled "Code of Practice for the Provision of Electronic Communications Services to Consumers". In 2009, we had a decline of complaints which goes on until now.

You must have in mind that telecommunications contracts and especially switching contracts are mainly concluded through a telephone communication. The pre contractual information is so much that it is impossible for a consumer to keep everything in mind. The providers keep a record of the telephone communication. But consumers do not dispose any written contract before they are connected. We had a lot of complaints about that. Irrespective of who picked up the phone (a child or elderly with Alzheimer problems) if the consumer said "yes", he was switched to the new provider. We still have such problems but they are lessening because of the aforementioned decision by EETT. We believe that a contract in a durable form should be provided to consumers before the procedures of switching begin. This term should be lifted only by the will of the consumer (eg in case he is in great hurry).

Being always at your disposal.

Yours sincerely,

Nikolaos Tsemperlidis, President KEPKA

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