AT&T RESPONSE

TO BEREC'S CALL FOR CONTRIBUTIONS

ON POSSIBLE EXISTING LEGAL AND ADMINISTRATIVE BARRIERS WITH REFERENCE TO THE PROVISION OF ELECTRONIC COMMUNICATIONS SERVICES FOR THE BUSINESS SEGMENT

(BEREC FR IMPL EWG_BS_110704)

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Introduction

The affiliates of AT&T Inc. that provide communications services to, from and within European Union Member States (collectively, "AT&T") respectfully submit these comments on BEREC's *"Call for contributions on possible existing legal and administrative barriers with reference to the provision of electronic communications services for the business segment"* issued on 4 July 2011 (the "Consultation").

AT&T applauds BEREC's decision to investigate the inefficiencies market players experience due to administrative barriers and possible solutions. AT&T has previously made recommendations to BEREC on this issue.[1] This response picks up the same themes and recommendations from that earlier *AT&T Recommendations to BEREC Paper*, and also addresses some additional issues.

We encourage BEREC to continue its work in this area, and in particular, to include this topic in its work programme for 2012. We believe that BEREC's work in this area will be an important contribution to the European Commission's investigation into the cost of non-Europe in telecommunications markets and the follow up to the Ecorys study.[2] Continued BEREC focus on this issue will be directly relevant to the Commission's stated intention to take further measures in this area to reinforce the benefits of the Single Market.[3]

AT&T in the EU

AT&T has considerable experience of operating under telecom licensing regimes globally, including the EU general authorisation framework. Operating globally under the AT&T brand, AT&T Inc., through its affiliates, is a worldwide provider of Internet Protocol (IP)-based communications services to businesses and a leading U.S. provider of wireless, high speed Internet access, local and long distance voice, and directory publishing and advertising services, and a growing provider of IPTV entertainment offerings. AT&T operates one of the world's most advanced global networks and has operations in countries that cover 97% of the world's economy. Within the EU, AT&T is a competitive provider of business connectivity and managed network services, and has affiliate companies in 26 of the EU's Member States. These AT&T companies operate under the general authorisation regimes, as transposed from the EU Authorisation Directive into national legislation, and as

[1] *Removing Administrative Barriers from Business Communications Service Providers - AT&T Recommendations to BEREC*, February 2011, available at: http://www.attpublicpolicy.eu/wp-content/uploads/2011/03/2011-02-Removing-Administrative-Barriers-from-Business-Communications-Service-Providers.pdf *("AT&T Recommendations to BEREC Paper")*

[2] *Steps towards a truly internal market for electronic communications networks and services in the run-up to 2020*, Study contract awarded by the European Commission on 29.11.2010 to Ecorys in cooperation with TNO and Delft University of Technology.

[3] Action 20 of the EU Digital Agenda refers.

implemented and enforced by the National Regulatory Authority (NRA) in each Member State.

AT&T Answers to BEREC's Questions

AT&T is pleased to provide the following responses responds to the questions asked by the BEREC Consultation.

Question 1. Under the current authorisation regime laid down by the 2002 Authorisation Directive (and substantially confirmed by the 2009 review), the ECNS operators are entitled to start activities upon notification/declaration to the NRA.

- ***What is your overall experience of the practical implementation of such administrative regime in member States?***
- ***Did you encounter inconsistencies or operational constraints potentially affecting the provision of cross-border business services? If yes, please provide a description.***

As part of the revisions to the EU Regulatory Framework in 2002, the requirement for telecom licences was removed and replaced with a general authorisation regime, as mandated by the EU Authorisation Directive.[4] Authorisation systems, such as individual or class licences, involving prior approval, explicit decisions or administrative acts by governments or regulators permitted under the previous Licensing Directive[5] are now prohibited.

AT&T believes that the current authorisation regime (which replaced the previous licensing of telecom networks and services) has been a positive streamlining step towards facilitating and encouraging market access, with minimal barriers to investment and innovation. This has facilitated the ability of AT&T and other companies to provide consistent services to business customers across all the EU Member States, even as technology and customer needs have expanded. Indeed, AT&T has encouraged governments and regulators elsewhere in the world to adopt this light-touch EU approach. However, although the concept is highly commendable, AT&T's experience is that general authorisation regimes have not been implemented in a harmonised or consistent way across EU Member States, causing unnecessary complexity and inefficiency for providers of pan-European services and regulators monitoring these services, and hampering the growth of the single market. In this regard, AT&T highlights the following issues:

[4] Directive 2002/20/EC of the European Parliament and of the Council of 7 March 2002 on the authorisation of electronic communications networks and services ("the (EU) Authorisation Directive")

[5] Directive 97/13/EC of the European Parliament and of the Council of 10 April 1997 on a common framework for general authorizations and individual licences in the field of telecommunications services

1.1. Notification Requirement

The Authorisation Directive requires Member States to ensure the freedom to provide electronic communications networks and services. Specifically, the Directive requires that electronic communications networks and services providers be allowed to launch services without any explicit decision or administrative act on the part of the national regulatory authority. Under the EU general authorisation regime, any procedural requirements must be limited to requiring providers to submit a notification or declaration to the NRA that networks and/or services are (to be) offered. In practice, AT&T is aware of two NRAs, Ofcom in the UK and NITA in Denmark, which decided not to impose a notification requirement. To AT&T's knowledge, the absence of a notification requirement has not caused any difficulties for the NRAs in the UK and Denmark in regulating the national markets (or obtaining fees from eligible network and service providers in the case of the UK). AT&T would therefore encourage BEREC to explore the Ofcom and NITA experience with a view to identifying the scope for the (voluntary) abolition of notification by more or all EU NRAs.

1.2. Notification Process

The Authorisation Directive requires Member States to ensure the freedom to provide electronic communications networks and services. Specifically, the Directive requires that electronic communications networks and services providers be allowed to launch services without any explicit decision or administrative act on the part of the national regulatory authority. In practice, the procedural requirements for making notifications can be unduly complex. Very few NRAs facilitate the online filing of notifications, which is possible in, for example, Austria, Finland and Ireland, but not in most Member States operating a notification requirement. Some of the offline notification processes are quite cumbersome, e.g., application of company seals required (Greece); time limits on notification validity (Italy); regular notification updates required (Spain); details required on shareholder ownership, network architecture - with diagrams -and technology (Portugal); commercial agreements with underlying providers to be attached to notifications (Italy). AT&T therefore encourages BEREC to explore the scope for simple online notifications to be made possible in all countries operating a notification requirement.

The processes to review, maintain and update notifications, particularly as new products or services are launched, can also prove unduly cumbersome. A recent report [6] for ARCEP by Hogan Lovells and Analysys Mason noted that:

> *"The principal difficult for operators, however, arises from the obligation that they are supposed in theory to keep ARCEP informed of any change to the information provided at the time of the initial declaration. This is an obligation that they do not*

[6] *Étude sur le périmètre de la notion d'opérateur de communications électroniques*, Study for ARCEP by Hogan Lovells and Analysys Mason, June 2011

necessarily satisfy in practice. Similarly, it can happen that operators omit to inform ARCEP of the withdrawal of service of network operation activities when this occurs." (Our translation from the original French)

Such processes would be much improved if regular renewals of notifications were not required and recognition given to the fact that, as noted by the study for ARCEP, operators' rights and obligations exist independently of whether a declaration has been made.[7] In this context, updates to notifications, particularly for cross-border business service providers should ideally be regarded as discretionary.

AT&T believes that the potential of several future innovative services, such as connected devices and machine-to-machine (M2M) solutions, will be impeded in the EU if they are held back by overly complex notification procedures for mobility and mobile resale-based applications.

1.3. Notification Categories

Under the Authorisation Directive, notifications must not entail more than a declaration by the provider of the intention to commence service or operations, and "minimal information which is required to allow the national regulatory authority to keep a register."[8] A table showing AT&T's experience of notification categories and other aspects of notification regimes was included in the earlier *AT&T Recommendations to BEREC Paper* and this table is reproduced again as Annex 1 to this response.

AT&T's experience is that notification requirements vary significantly between Member States as regards the categories of networks and services that may be declared. Some notification regimes have over 50 potential categories, while, for example, Sweden's PTS has one of the most straight-forward, "user-friendly" notification regimes with just 8 categories. The result of this variation in notification approaches is that, although AT&T offers identical services across the EU Member States, we are registered in quite different categories in each Member State. Not only does this variance create complexity for service providers, it must impede the ability for Member States to compare information about their markets. A simplified and consistent set of categories, based on adoption of a common declaration form by all NRAs requiring notifications, would improve the situation, both for service providers and NRAs.

1.4 Notification Language

AT&T is deeply respectful of the language and cultural traditions of the EU Member States, and at the same time, would urge NRAs to consider the boost to market

[7] *Id.* at page 109: *"In theory, the status of electronic communications operator and the rights and obligations that go with it exist independently from any declaration by virtue of the very activity of the entity in question" (Our translation)*

[8] Article 3(2) of the Authorisation Directive

access and the reduction in complexity that could be achieved by having more elements of national general authorisation regimes available in languages additional to the official language(s) of the Member State in question.[9] Combined with a drive towards a more harmonised general authorisation regime and notification requirements, there could be scope for inter-NRA assistance in creating such language resources.

Question 2: As far as the administrative regime is concerned, can you identify some national best practice across Europe which may help in supporting the provision of cross-border business services?

As noted above, we regard both the Danish approach, as well as the 2003 decision[10] by the UK regulator not to require notification, to be examples of best practice across Europe. Among countries that maintain a notification requirement, we consider the Sweden's PTS to have one of the most straight-forward, "user-friendly" notification regimes with just 8 categories of notifiable networks or services.

As noted in our answer to Question 3 below, we also highly commend UK regulator Ofcom's pragmatic approach of not applying inappropriate consumer protection obligations to providers of services to large enterprise customers.

Question 3: Besides the authorisation system, are there any other differences in administrative procedures in the area of telecommunications that may affect the provision of business services across Europe?

In the earlier *AT&T Recommendations to BEREC Paper,* we highlighted differences in administrative procedures in the area of telecommunications that we considered to fall within the competence of the national regulatory authorities that are represented in BEREC. In this response, we also make reference to differences in administrative procedures in the area of telecommunications that may be within the competence of other agencies or parts of government, but which nevertheless still negatively affect the provision of business services and hinder the Single Market.

3.1 Administrative Fees

The Authorisation Directive provides that the payment of both administrative charges and universal service fees can be legitimate conditions attached to the enjoyment of a general authorisation. To date, universal service fees are only levied in a limited number of EU Member States. Administrative charges, however, are levied in most Member States and are mostly related to revenue from electronic communications,

[9] In Belgium, for example, notifications can be made in French, Dutch or English.
[10] *Implementation of the Authorisation Directive's Provisions on Notifications and Fees***,** OFTEL, 21 May 2003, available at: http://www.ofcom.org.uk/static/archive/oftel/publications/eu_directives/2003/notfees0503.htm

although some NRAs apply a flat fee or fees related to the type of service provided.[11] However, where revenue-based fees are applied, the precise basis and calculation of such charges varies significantly. Some NRAs require fees to be based on total electronic communication service revenues, while others apply a 'net revenue' or 'value added' approach (with fees based on revenue after deduction, respectively, of telecom or total costs). AT&T believes that it would be more efficient if NRAs adopted a consistent and exclusively revenue-based system for the calculation of administrative fees where these are applied.[12]

The evidence required to certify accuracy of declared revenue (where this is the basis for administrative fees) also varies significantly between Member States. In some Member States, providers are required to submit audited accounts or statements, or auditable accounting methodologies.[13] This can often create a dilemma for operators of either making over-payments (by paying on the basis of total revenues, rather than pure electronic communications revenue), or incurring significant costs to build accounting systems to satisfy the specific audit requirement. AT&T asserts that such costs represent a disproportionate burden, particularly for providers not subject to accounting separation requirements pursuant to an SMP finding. In several Member States, however, it is possible to self-certify[14] revenue (with such certification subject to possible verification or further investigation at the NRA's discretion), but without the need to provide audited financial information. AT&T strongly recommends that such an approach should be adopted on a consistent basis by all NRAs.

3.2 Reporting Obligations

NRAs require electronic communications network and service providers to complete multiple financial, statistical and market analysis reports. There is little consistency in the format or data categories of these requests, and there are significant variations in practice. A number of NRAs impose virtually no reporting obligations, while others make substantial requests.[15] The consequence is that a provider of cross-border services will expend hundreds of person hours to complete inconsistent forms in multiple languages. All of this adds cost and complexity of providing cross-border services. A table showing AT&T's experience of reporting obligations was included in

[11] In **Belgium**, IBPT/BIPT levies fees based on the category of network or service provided rather than revenue. In **Italy,** a service-based fee (based on population covered) is payable to the Ministry of Communications, with a separate a revenue-based fee payable to Agcom. In **France**, the administrative fees are flat charges (see http://www.arcep.fr/index.php?id=8090), while universal service fees are based on a percentage of revenue. In the **UK**, **Cyprus** and **Finland**, fees are based on revenue bandings with all providers in the same band paying a fee as if their revenue were at the bottom of the applicable band.

[12] Any thresholds for exemption from fees or the application of revenue bands would still need to be determined at a national level, as, of course, would the percentage of revenue payable as a fee.

[13] This is the case in, for example, Cyprus, Finland, Greece, Ireland, Netherlands, Poland, Portugal, Romania, Slovak Republic and Spain.

[14] This is the case in, for example, Austria, Belgium, Bulgaria, Czech Republic, Hungary, Latvia, Luxembourg, Slovenia, Sweden and UK.

[15] An NRA from one of the smallest Member States requires 6 reports comprising nearly 1000 questions in total.

the earlier *AT&T Recommendations to BEREC Paper* and this table is reproduced again as Annex 2 to this response.

AT&T respectfully recognises that NRAs need full and accurate market information to carry out their functions, but we believe that action could be taken to encourage more common and targeted reporting obligations, through, for example, the use of common reporting forms with consistent numbering of sections (which would greatly assist providers who have to complete forms in multiple languages). A more consistent approach to reporting would also facilitate data gathering and comparative analysis work by, for example, COCOM and the European Commission. We therefore encourage BEREC to explore the scope for establishing common forms and approaches for the reporting of financial, statistical, service category and other market information by electronic communications networks and service providers.

Wherever possible in such a common reporting regime, and consistent with the new obligation on cross-border business services in the BEREC Regulation, the ideal default position would be that cross-border business providers are exempt from the requirement to provide data, unless the NRA decides explicitly that particular categories of information about business services are necessary from such providers.

3.3 Consumer Protection Obligations

A number of NRAs seek to impose consumer protection obligations which have little relevance or applicability to larger enterprise customers, for example, requirements regarding publication of prices, terms and conditions, as well as consumer codes of practice or service charters; availability of consumer complaint-handling procedures, alternative dispute resolution schemes and compensation arrangements. It is difficult to see the relevance of these obligations in the context, for example, of heavily negotiated contracts that follow competitive tendering processes with large enterprise customers. In the case of cross-border providers of business communications services, these contracts are for multi-country solutions and the arrangements for such matters are not specific to any country or geography. Furthermore, the contracts are usually negotiated with the full involvement of the legal services of both the supplier and customer, so the concerns behind such consumer protection requirements do not arise, or are specifically managed in the contract. It is a different circumstance from mass market consumer services.

AT&T fully recognises that consumer protection and user confidence are crucial elements for the future development of the market for communications services, but we believe that NRAs could be more pragmatic about which obligations are relevant to particular enterprise segments and recognise that the protections offered in individually negotiated contracts with business customers may often exceed those available to individual consumers, but do so in a way tailored and targeted to the needs of the customer. In this regard, AT&T commends the approach taken in the

UK's general authorisation regime in which certain obligations relating to consumer protection are expressly exempt in the case of customers other than consumers or small business customers. For example, Condition 14 of the UK General Conditions of Entitlement applies obligations regarding consumer codes of practice, complaint-handling procedures and alternative dispute resolution only to providers of services to "Domestic and Small Business Customers", while Condition 9 requires minimal contract terms to be made available to "Consumers (or other End-Users on request)."[16]

AT&T encourages BEREC to explore the scope for a common, pragmatic and flexible approach to the application of consumer protection obligations to providers of services to large enterprise customers, drawing on current NRA best practice. Where the underlying policy to the consumer protection obligation is not applicable in the large enterprise customer context, the obligation should not be applicable.

3.4 Lawful Intercept

It is wholly proper that law enforcement agencies (LEAs) in EU countries should be able to demand and expect cooperation with communications service providers (CSPs) on investigations. In the past, such cooperation was focused on imposing specific obligations on the major facilities-based providers to build a lawful intercept (LI) capability. More recently, as the migration to IP-based services accelerates, some countries have started to adopt or consider imposing 'one-size-fits-all' LI obligations on all or most CSPs. The indiscriminate application is neither proportionate to reasonable need, nor sustainable to many competitors, particularly those providing business services to a comparatively small number of large enterprise customers.

AT&T highly commends a recent paper[17] on this issue by the International Chamber of Commerce (ICC). The ICC paper makes several recommendations for ensuring reasonable requirements for LI capabilities are met, while minimising unnecessary adverse effects on market players:

- Recommendation 2 states that LI obligations on CSPs serving only enterprise customers should be remain minimal, and proportionate to realistic threats.
- Recommendation 3 calls for proportionately lighter regulatory obligations to apply to small CSPs with few customers in a given country, to keep benefits and costs in balance. The ICC cites examples of best practice in this regard by a number EU Member States. For example, in both Germany and the

[16] See, e.g., Conditions 9 and 14 of the UK General Conditions of Entitlement. Latest version as at 25 May 2011 available at: http://stakeholders.ofcom.org.uk/telecoms/ga-scheme/general-conditions/

[17] *Global business recommendations and best practices for lawful intercept requirements,* International Chamber of Commerce, Document No. 373-492 (June 2010) available at: http://iccwbo.org/uploadedFiles/ICC/policy/e-business/Statements/373492LawfulInterceptPolicyStatementJune2010final.pdf

UK[18], CSPs that serve less than 10,000 customers are exempt from LI capability obligations, unless specifically directed otherwise.

- Recommendation 5 of the ICC paper states that centralised, multi-country LI solutions should be permitted, and individual countries should not unreasonably restrict CSPs from meeting LI obligations of multiple countries via centralised facilities, at locations selected based on commercial considerations.

AT&T urges EU governments and competent authorities to take account of the ICC recommendations as they develop proposals for adapting LI frameworks to converged IP-based services.

3.5 Data Retention

The obligations contained in the EU Data Retention Directive (2006/24/EC) are not applied consistently or proportionately across the EU. This needs to be addressed in the current review of Directive, but a more pragmatic approach to the implementation and application of the current Directive would also assist. For example, some Member States, such as the UK and Finland, apply thresholds to the application of data retention requirements.

Most large enterprise service providers rarely receive requests for access to retained data because:

- criminals and terrorists very rarely conduct activity via the VPNs of significant business enterprises;
- it is extremely difficult to identify and isolate an individual subject within the enterprise traffic stream; and
- the data of interest to LEAs is not available on the servers or networks of the service provider and, if it exists at all, will be in the domain of the commercial enterprise customers who generally have extensive in-house control over their networks.

The Directive should therefore be applied in a proportionate manner to such providers. Inconsistent requirements with regard to data retention periods and data categories should be removed and local storage requirements should not be acceptable as they violate the principle of free flow of data as set out in article 16 (2) of the Treaty on the Functioning of the European Union.[19]

[18] *See, e.g.*, TKÜV § 3(2)(5); UK Regulation of Investigatory Powers (Maintenance of Interception Capability) Order 2002, § 2(3)(a).

[19] In October 2010, a paper (DatRet/EXPGRP (2009) 6 FINAL – 11 10 2010) by the EU's Data Retention Expert Group concluded that: *"Any obligation imposed by a Member States for the data to be retained on its own territory, is a restriction to the principle of free flow of data within the EU."*

3.6 Legal Establishment

It is often not possible for a company registered in one Member State to notify directly under the authorisation regime of another Member State. In some instances, this restriction is applied directly by the telecom NRA, while, in other cases, it arises from other non-telecom related areas of the national legislative and administrative framework. Whatever the root cause, the net result is a barrier to the genuine cross-border provision of business services within the EU: network and service providers are frequently obliged to establish local legal entities or local branches in each Member State of operation, and to incur the costs of maintaining such entities, even where a suitable entity is already established in a neighbouring EU country. As a minimum, we believe that the telecom NRAs (and/or the relevant parts of government) in every Member State should ensure that there is nothing within the terms of their electronic communications authorisation regime to prevent a company from another EU Member States from operating under that regime without need to establish a local branch or subsidiary.

Question 4. Do you believe that the provision of cross-border business services could be subject to a specific administrative regime?

- ***If so, for which reasons and under which legal basis?***
- ***What should be the special features of such regime?***

The revised EU Regulatory Framework imposes an obligation on the newly established BEREC:

> *"to deliver opinions aiming to ensure the development of common rules and requirements for providers of cross-border business services."*[20]

Furthermore, the revised Framework also includes the following amendment to the Authorisation Directive by way of an addition to Article 3(2):

> *"Undertakings providing cross-border electronic communications services to undertakings located in several Member States shall not be required to submit more than one notification per Member State concerned."*

AT&T believes that these provisions do establish a basis for further reform and the introduction of a specific administrative regime for cross-border business services. In our view, the decision to introduce these additions to the Framework was in part reflective of the challenges presented by the current situation, whereby operators providing identical services on a pan-European basis, cross-border basis are required to notify individual NRAs using inconsistent national categories to declare

[20] Article 3(m) of Regulation (EC) No 1211/2009 of the European Parliament and of the Council of 25 November 2009 establishing the Body of European Regulators for Electronic Communications (BEREC) and the Office ("the BEREC Regulation")

identical services, in multiple languages. This complicates the provision of pan-European services and hinders the development of the EU Single Market.

AT&T recommends that consideration should be given to:

- the inclusion of a pan-European or cross-border service provider category in any agreed common EU-wide notification form;
- a common agreement among NRAs that cross-border service providers will not be expected to file notifications; or
- the development of a one stop shop arrangement, whereby cross-border business service providers could notify in one jurisdiction with a request for that notification to be replicated in any other specified EU Member States, via an inter-NRA process not requiring any further action by the notifying party.

* * *

Conclusion

AT&T believes that successful implementation of improvements in the areas identified could contribute to the reduction of administrative barriers and inefficiencies that impede both business service providers and NRAs. AT&T believes that implementing such improvements will:

- further simplify market entry, investment and operations;
- reduce administrative costs for providers and NRAs;
- facilitate improved information sharing and comparative market analysis by national regulatory authorities (NRAs) and the European Union institutions;
- give effect to the new regulatory Framework's requirements regarding cross-border services;
- enhance the digital Single Market, and contribute towards realising the objectives of the Digital Agenda.

Although AT&T's recommendations are from the perspective of a provider of business services to the world's largest multinational corporations, on a pan-European and global basis, we believe that some of our proposals would also benefit providers serving other business customer segments, as well as those providing services to consumer customers in multiple Member States. AT&T would be pleased to respond to any comments or questions on these recommendations.

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ANNEX 1

Notification Regimes in the European Union[21]

Country	Categories					Form or Explanation in English?	Online Notification Possible?
	Services	Sub-categories	Network	Sub-categories	Total[22]		
Austria	5					No	Yes
Belgium	7				7	Yes	No
Bulgaria	11		5	14	25	No	No
Cyprus	8	23	6	14	37	Yes	No
Czech Republic	6	29	6	27	56	Yes	No
Denmark	No notification requirement						
Estonia	7				7	No	No
Finland	7	14			14	Yes	Yes
France	8		3	9	17	No	No
Germany	20	48	7	3	58	No	No
Greece	33	4	22		136	Yes	No
Hungary	30		10		40	No	
Ireland	6		7		13	Yes	No
Italy	13					No	No
Latvia	9		4		13		
Lithuania	5	14			14	No	
Luxembourg	6	21			21	Yes	No
Netherlands	3	31	6		37	Yes	No
Poland	19	6	9		34	No	No
Portugal	14	3	9	4	28	Yes	
Romania	6	35	4	31	66	No	Yes
Slovak Republic	6		8		14	No	No
Slovenia	8	20	3	11	31	No	No
Spain	6	32	2	3	35	No	No
Sweden	3	5	2	3	8	Yes	No
UK	No notification requirement						

[21] *This table reflects AT&T's experience of notification regimes in 26 EU Member States as of February 2011. It is not intended as a definitive description, but rather an indication of the degree of variation observed.*

[22] *Totals do not always reflect cumulative sum of other columns, reflecting differing interactions between main categories and sub-categories.*

ANNEX 2

Regulatory Reporting in the European Union[23]

Country	Number of reports analyzed by AT&T for 2010				Total Number of Questions Asked and Analyzed for Relevance to AT&T	Total Number of Questions Answered and Relevant to AT&T Operations	Languages
	Annual	Bi-annual	Quarterly	One-Off			
Austria	2				8	6	German
Belgium		2			502	34	Dutch, French, German
Bulgaria	2				1,400	180	Bulgarian
Cyprus	2		4		1,400	120	Greek
Czech Rep.	1	2			178	33	Czech
Denmark	1	2			1,050	37	Danish, English
Finland	1				12	12	Finnish, English
France	4		4		2,296	231	French, some English
Germany	1			3	201	54	German
Greece	1	2			4,528	32	Greek
Hungary	2		4	1	4,166	103	Hungarian
Ireland	1		4		1,945	69	English
Italy	2				32	25	Italian
Latvia	3	4		1	259	45	Latvian
Luxembourg		6		1	3,725	156	French
Netherlands	2		3	1	400	78	Dutch
Poland	4			1	2,051	131	Polish
Portugal	5				292	57	Portuguese, some English
Romania	2	2		1	442	82	Romanian
Slovak Rep.	2	2		1	2,238	54	Slovak
Slovenia	2		4	1	938	64	Slovenian
Spain	3		4		3,986	180	Spanish
Sweden	1	1		1	803	58	Swedish, English
UK	1		4		798	44	English
Total	**45**	**23**	**31**	**12**	**33,650**	**1,885**	**in 19**
Yearly Total	**111**				**questions**	**relevant**	**languages**

[23] *This table reflects AT&T's experience of reporting in EU Member States as of February 2011. It is not intended as a definitive description, but rather an indication of the degree of complexity observed.*