

Termination rates at European level

July 2015

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1. Executive Summary

This document is an updated version of the benchmark of fixed and mobile Termination Rates (TRs) across Europe prepared by the BEREC Benchmarking Expert Working Group in cooperation with the BEREC Remedies Expert Working Group and the BEREC Office and aims to offer a picture of the regulated rates for fixed and mobile interconnection services in Europe. Fixed and mobile termination services in Europe are subject to price regulation.

The European Commission Recommendation on relevant product and service markets 2014 identifies:

- call termination on individual public telephone networks provided at a fixed location as a relevant market susceptible of ex-ante regulation (market 1)
- wholesale voice call termination on individual mobile networks as a relevant market susceptible of ex-ante regulation (market 2).

Because of the structure of these two markets, in general each network operator has an SMP position (i.e. a monopoly) for termination on its own network and therefore its termination rates are regulated.

The present overview of TRs is based upon the results of a request for information sent to all NRAs in July 2015, referring – if not differently indicated – to data as of 1st July 2015. It includes rates from the thirty six (36) NRAs¹ that provided responses to our request.

As of July 2015, this is the situation regarding TRs in Europe:

- The FTR simple average of incumbents at the European level stands at 0.31 eurocents per minute for Layer 1. The average for Layer 2 stands at 0.49 and for Layer 3 at 0.45 eurocents per minute.
- The FTR simple average of European Union incumbents operating at Layer 1 stands at 0.27 eurocents per minute. The average for Layer 2 stands at 0.23 and for Layer 3 at 0.38 eurocents per minute.

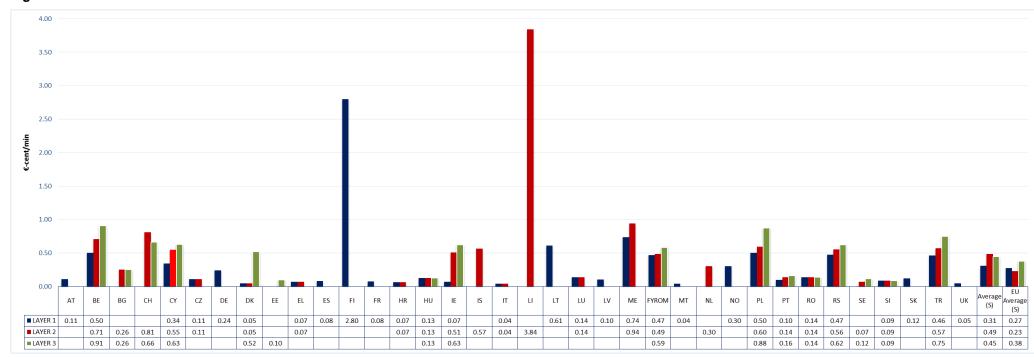
¹ 28 EU member states plus 4 EFTA states (Switzerland, Iceland, Norway and Liechtenstein) and 4 candidate states Montenegro, FYROM, Serbia and Turkey.

- The MTR simple average (A(s)) at the European level (all 36 countries) stands at 1.52 eurocents per minute, whereas the weighted average (A(w)) at European level is estimated at 1.22 eurocents per minute.
- The MTR A(s) at the EU level (only EU member states) stands at 1.13 eurocents per minute, whereas A(w) at EU level is estimated at 1.14 eurocents per minute.
- The domestic SMS TR A(s) at the European level is 2.59 eurocents per SMS, whereas A(w) is reported to be 2.29 eurocents per SMS.
- Since not all EU member states report their SMS TR, no averages at the EU level could be calculated.

For non-euro countries, the average exchange rate for the second quarter of the year (Q2 2015) was used for the calculation of MTRs and SMS TRs. The exchange rates used are reported in Annex 10.

Overview of incumbents' fixed termination rates per country and layer – July 2015 (Euro cents per minute of service)

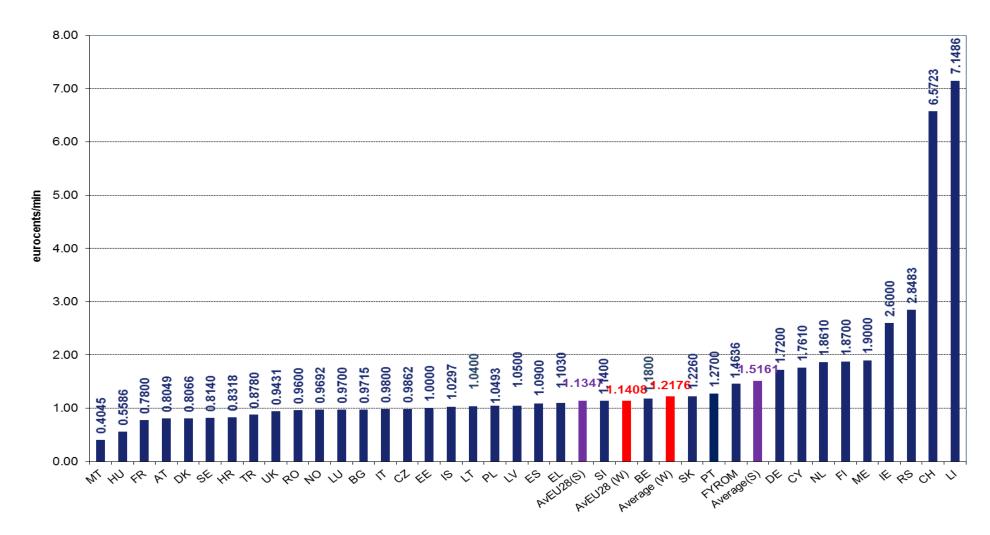
Figure 1 FTRs



Simple averages are provided for all layers. The simple average for EU countries (as represented per layer) is available in the last column. For more information see <u>Annex 1</u>.

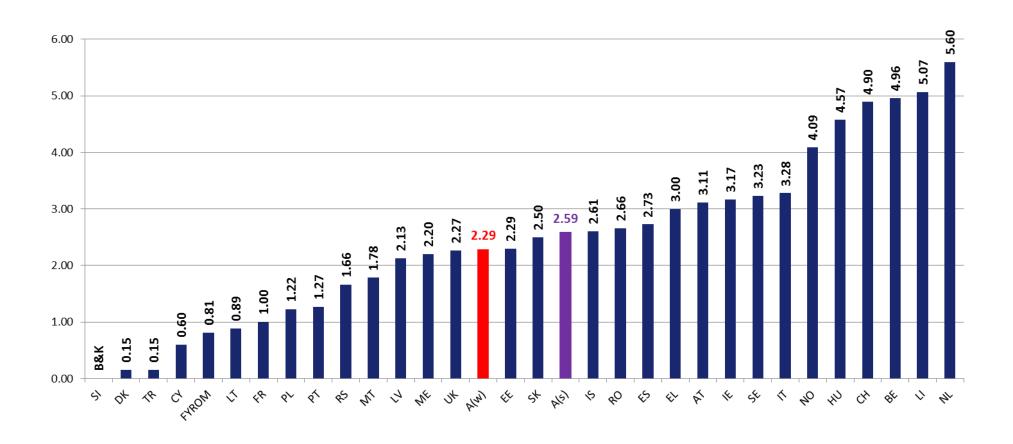
MTR per country – July 2015 (Euro cents per minute of service)

Figure 2 MTR



SMS TR per country – July 2015 (Euro cent per message)

Figure 3 SMS TR



2. Fixed networks - voice interconnection

The regulation of FTRs has been harmonized by the Recommendation of 7.5.2009 on the Regulatory Treatment of Fixed and Mobile Termination Rates in the EU (C (2009) 3359 final). However, some differences can be found across the national regulatory regimes:

- 1) In some cases the termination rate is a two-part tariff, i.e. composed of a variable part (to be paid for each minute of a call) plus a set-up or fixed part (to be paid for each call). In other cases, termination prices consist only of the variable part.
- 2) Interconnection services in fixed networks are provided at different levels in the hierarchy of the incumbent's networks, called layers. Even though some peculiarities in specific countries are present, in general three main layers for interconnection are defined: i) layer 1, or local level service provision, ii) layer 2, or regional level service provision (single transit), and iii) layer 3, national level service provision (or double transit).

2.1. Assumptions made for benchmarking

The following assumptions have been made in order to make tariffs comparable:

- In order to obtain a homogeneous comparison of average prices per minute across operators, a 3-minute average call duration has been assumed, using the standard formula: (fixed set-up charge + price per minute*3)/3.
- Nominal tariffs are reported only when the NRA has set out the maximum price per minute that operators may charge each other.
- For those countries which have not set a single tariff and which apply distinct rates for the peak/off-peak period, an average price has been calculated taking into account the traffic distribution between peak and off-peak time. When this distribution has not been made available, a 50/50 distribution has been assumed.

2.2. FTR benchmark

In Annex 1 the interconnection prices of operators listed by countries are presented. For each country, the NRA has provided information on the incumbent and some alternative or cable

operators offering interconnection services. Peak and off-peak rates are differentiated, as well as the layer of interconnection. In the last column a weighted average of peak/off-peak prices is provided.

2.3. Incumbent interconnection rates trend (from January 2011 to July 2015)

This section presents the trend of simple average of effective average price per minute of each layer of interconnection service provided by incumbent operators. The averages for July 2015 comprise information available in <u>Annex 1</u>.

Figure 4 Simple averages²³ of incumbents' fixed termination rates at the European level per layer



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² The average of Layer 2 is slightly higher in January 2015 compared to January 2014, due to the inclusion of additional countries that did not provide information for January 2014.

³ The average of Layer 3 in July 2015 is slightly higher compared to January 2015, due to the inclusion of different countries that did not provide information for January 2015.

Short term evolution of incumbents' fixed termination rates per layer and country (from January 2015 to July 2015 in Euro cent)

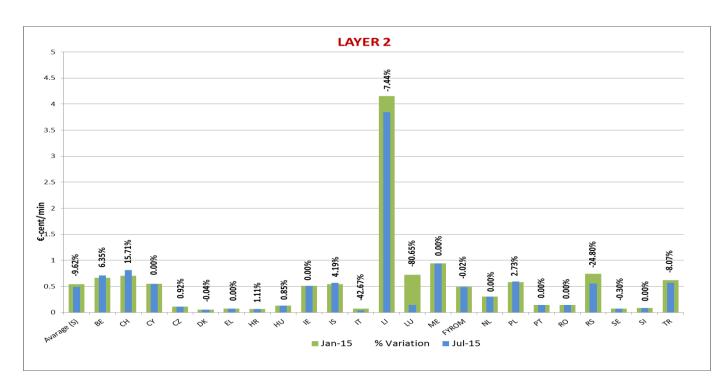
Figure 7 Layer 1 short term evolution⁴⁵

The percentage variation of FTRs in non-Euro zone countries shows change only in the case of Serbia, where the price decreased by 9.52%.in their national currency.

⁴ The rates and variation for Finland reflect the average across all operators.

⁵The variation of FYROM reported as of July 2015 is calculated based on the rate of 0.4717 for January 2015.

Figure 8 Layer 2 short term evolution⁶



The percentage variation of FTRs in non-Euro zone national currency shows a decreasing trend in the cases of Liechtenstein by 20% and Serbia by 24.72%.

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 $^{^{6}}$ The variation of FYROM reported as of July 2015 is calculated based on the rate of 0.4880 for January 2015.

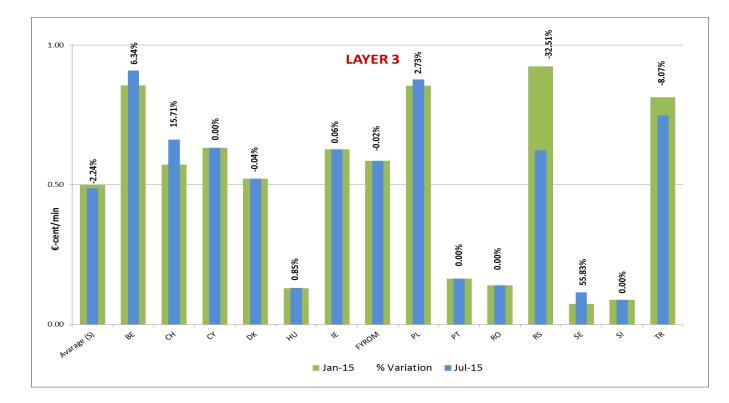


Figure 9 Layer 3 short term evolution⁷

National currency variations for non-Euro zone countries show a decrease by 32.43% in case of Serbia in the period of January-July 2015.

2.4. Average revenue per minute for all operators (2014)

In the next graph (Figure 10) the average revenue per minute from interconnection services across all Layers and for all operators is reported, together with the simple average (horizontal line). The data refer to the entire year of 2014, unless otherwise stated in the notes. Note that the average revenues per minute provided are aggregated for each country to: 1) the different existing layers of interconnection, 2) the different operators (i.e., incumbents and the rest), and 3) the different prices deriving from the peak /off-peak differentiation in a number of countries.

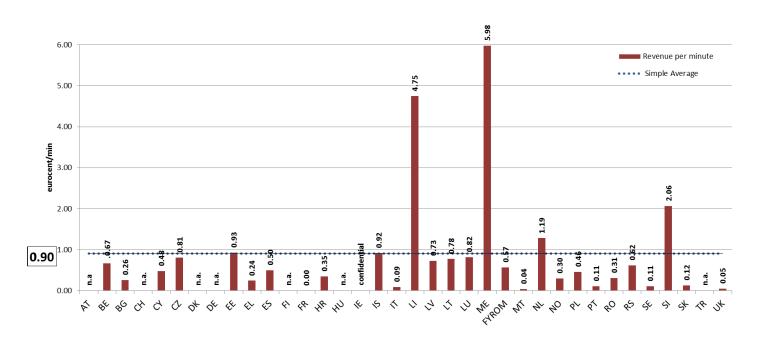
The comparison across countries of this average revenue has limitations, since each country may have a different distribution in usage across the different layers of interconnection and in the distribution between peak and off-peak traffic.

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⁷ The variation of FYROM reported as of July 2015 is calculated based on the rate of 0.5855 for January 2015.

For more information consult Annex 2.

Figure 10 Average revenue⁸ per minute (all operators) for the whole 2014

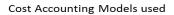


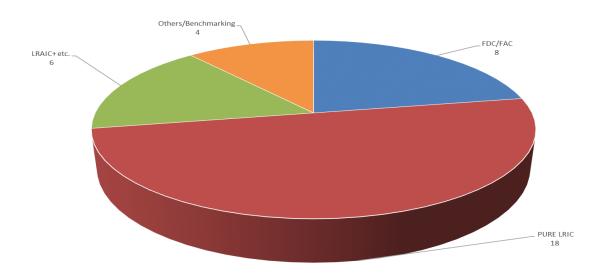
2.5. FTR regulatory model implemented and symmetry overview

Eighteen of the NRAs use Pure BULRIC models to set FTRs. The second most common model is FDC/FAC, used by eight NRAs. Six NRAs reported using a LRAIC+etc. models and four use Other/Benchmarking approaches.

⁸ The average revenue per minute shows an increasing trend compared to January 2015 due to the fact one of the NRAs reported revenues from calls originated in national networks. July data include also calls originated from abroad, which are not subject to regulation. For more details consult Annex 2.

Figure 11 Cost accounting models used by NRAs

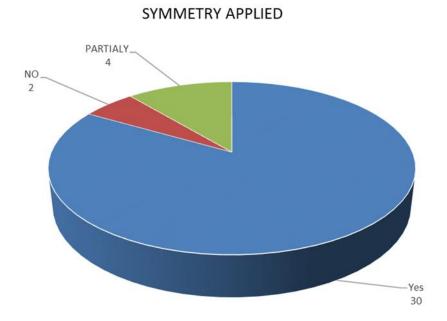




For more information consult Annex 3.

In most of the respondent countries FTRs are symmetric across all operators. Four of the NRAs reported partial symmetry while only two countries' fixed termination rates are not set symmetrically.

Figure 12 FTRs Symmetry



For more information consult Annex 4.

2.6. Number of lines and market shares

In <u>Annex 5</u> the number of active fixed telephony lines in the retail market is provided for each operator included in the report. For a number of countries this information is confidential.

3. Mobile networks - voice interconnection

This section presents the benchmark of mobile termination rates (MTR) with data as of 1 July 2015 and its recent evolution. The purpose of this comparison is to provide an indication of the level of MTRs across the NRAs, their variations and the cost models adopted for setting MTRs. Moreover this benchmarking exercise includes a section devoted to the analysis of the future evolution of MTRs. Finally, information about average wholesale termination revenues is provided.

The present overview of MTRs is based upon the results of a request for information sent to all NRAs in July 2015. It includes data from thirty-six (36) NRAs that provided responses.

3.1. Assumptions made for the benchmarking

For the present benchmarking exercise the following assumptions have been made in order to make tariffs comparable⁹:

- Operators with a market share below 1.5% have been excluded from the national MTR average calculation.
- Only nominal tariffs are represented in the report, defining them as "the price (in Euro cent/minute) set out by the regulator that represents the maximum price per minute which operators may charge each other (without any adjustment for purchasing power parity or real effects – inflation)."
- Average MTRs per country have been obtained by weighting the MTR of each operator by its market share, measured in terms of subscribers. Four general averages have been calculated: a simple average and a weighted average, each at the European level (including all 36 countries reporting data) and at EU level (including only the 28 EU member states). The weighted averages weight each country's average rate with the share of the country's subscribers (total subscribers per country / total subscribers in all countries).
- Regarding the number of subscribers, it must be considered that different estimation methods are used among European countries (especially in the case of pre-paid consumers).
- VAT is not included in the revenues.

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⁹ Generally speaking, these assumptions may create margins of error in the present comparison, making it difficult to draw valid conclusions for policy purposes.

- For non-Euro countries, the average exchange rate for the second quarter of the year (Q2 2015) was used to convert the currencies. The exchange rates used are reported in Annex 10.

Regarding the short-term MTR evolution (from January 2015 to July 2015), some variation may be a consequence of any of the following reasons:

- Modifications in the tariff structure (for instance, disappearance of the set-up charge or initial period);
- ii. Currency exchange rate variations in non-Euro countries¹⁰;
- iii. Changes in operators' market shares may have an effect on the average MTR for an individual country;
- iv. Inclusion of new operators that were not present in the previous benchmarks;

3.2. Average MTR per country: rates per voice minute (as of July 2015) Table 1 - Average MTR per country

Country	Average MTR per		
Country	country (€cent)		
AT	0.8049		
BE	1.1800		
BG	0.9715		
СН	6.5723		
CY	1.7610		
CZ	0.9862		
DE	1.7200		
DK	0.8066		
EE	1.0000		
EL	1.1030		
ES	1.0900		
FI	1.8700		
FR	0.7800		
HR	0.8318		
HU	0.5586		
IE	2.6000		
IS	1.0297		
IT	0.9800		

¹⁰ This only affects short-term MTR evolution (figure 13) because the percentage of tariff variation in each country (figure 14) has been calculated by comparing rates expressed in terms of the national currency.

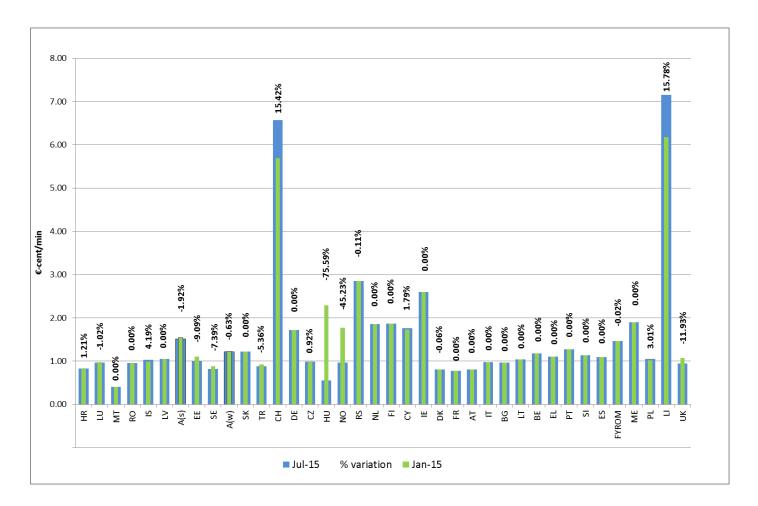
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LI	7.1486		
LT	1.0400		
LU	0.9700		
LV	1.0500		
ME	1.9000		
FYROM	1.4636		
MT	0.4045		
NL	1.8610		
NO	0.9692		
PL	1.0493		
PT	1.2700		
RO	0.9600		
RS	2.8483		
SE	0.8140		
SI	1.1400		
SK	1.2260		
TR	0.8780		
UK	0.9431		
Average(S)	1.5161		
Average (W)	1.2176		
Average EU 28 (S)	1.1347		
Average EU 28 (W)	1.1408		

Short-term evolution of average MTRs per country (from January 2015 to July 2015, in Euro cent)

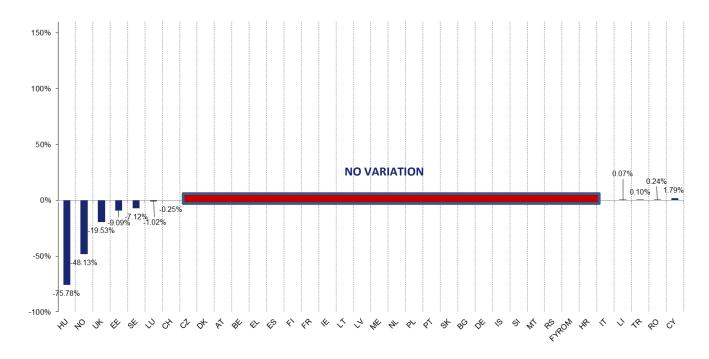
Figures 13 and 14 show the short term variations of MTRs in Euro and in national currency. These two figures illustrate the effect of the exchange rate on the short term evolution. The increase of the Polish MTRs e.g. are just a result of the exchange rate, since the rate in the national currency did not change. In Romania the regulated tariff is expressed in eurocents and had no variation during the period; the variation shown actually reflects the variation of the national currency exchange rate against the Euro.

Figure 13 variation in Euros



Percentage variation of average MTRs in <u>national currency</u> per country (from January 2015 to July 2015)

Figure 14 variation in national currency



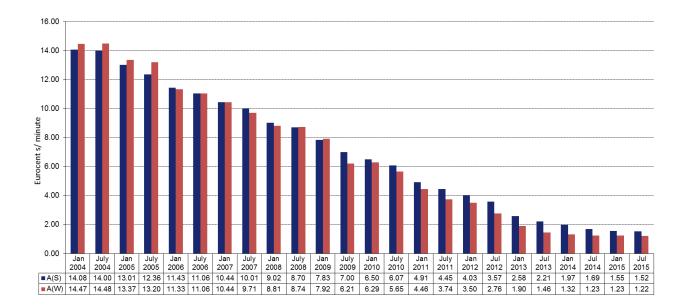
3.3. Average MTR per operator

There are a number of countries where information regarding number of subscribers and/or market share has been declared as confidential data and for this reason this report does not publish this data. Nevertheless, market shares have been taken into account for the average MTR calculations.

For further details see Annex 6.

3.4. Average MTR: Times series of simple average and weighted average at European level

Figure 15 Evolution of simple and weighted averages

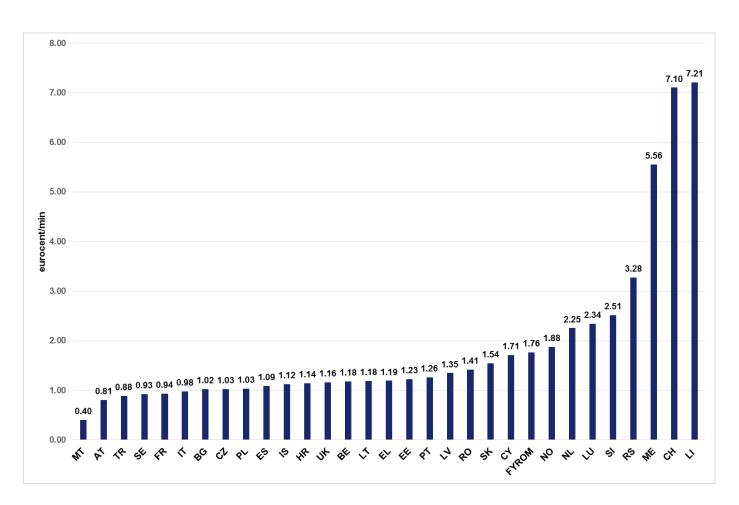


Note to figure 15: Averages are based on nominal rates per minute of service. The number of countries and operators considered has increased over the years, thus affecting the average slightly. Moreover the Weighted Average does not take into account countries not providing the total number of subscribers and those that could have changed over the years. Considering these caveats, the graph shows the general trend.

3.5. Average wholesale termination revenues

The average wholesale termination revenue is obtained as a ratio of total revenues from termination of voice services divided by the total number of minutes of termination provided by the operators. The data refer to the entire year of 2014, unless otherwise stated in the notes. Some countries do not collect information about termination revenues or treat this data as confidential. Those countries are not included in the figure.

Figure 16 Average wholesale termination revenues per country (euro cent/min)



Notes to figure 16 see Annex 7.

3.6. Regulatory model implemented and glide paths for MTRs

In the majority of states BU LRIC models are used to calculate the MTRs. But still a significant number of NRAs base their price decision on a BU LRAIC+ model.

Cost accounting models used

other 4

Benchmarking 6

BU LRAIC+ 4

Figure 17 Cost accounting models used by NRAs

For further details see Annex 8.

4. Mobile networks - SMS interconnection

The short message service (SMS) offered by operators is used every day by millions of people all over the world. This service is not regulated in most EU countries, but the evolution of wholesale SMS termination rates is monitored in most cases by NRAs.

The present SMS benchmark report bases its results on the inputs received by NRAs in August 2015, referring to data as of July 2015. Thirty-six (36) countries provided data, but some NRAs – following national law provisions – asked to treat the SMS Termination Rates as confidential information.

The benchmark aims at keeping track of the main trends in wholesale SMS TRs in Europe. The scope of the report is limited to describe termination prices at national level (no international SMS TR are therefore considered¹¹).

4.1. Assumptions made for benchmarking

The SMS TRs collected in this report reflect wholesale rates applied among domestic operators for an off-net SMS exchange, excluding VAT. They may diverge from the "average revenue from an SMS at wholesale level".

In this report individual, i.e. operator's specific, SMS TRs are presented, as well as averages calculated for each country as a whole. Regarding the number of subscribers, it must be considered that different estimation methods are used among European countries (especially in the case of pre-paid consumers). In some countries, SMS wholesale rates are considered to be confidential information.

The following characteristics of SMS TRs make the collection and comparison of data more straightforward (as compared to the exercise of benchmarking the FTRs and the MTRs):

- No countries differentiate between peak time, off-peak time and weekend hours.
- The price for SMS termination is related to each delivered domestic off-net SMS; therefore, no assumption is necessary about set-up charges or average call durations. Since Serbia introduced bilateral SMS TRs in June 2015, Slovenia is now the only country where "Bill & Keep" agreements are in place for traffic between all domestic operators.
- Average SMS TRs per country have been obtained by weighting the average TR of each operator by its market share, measured in terms of subscribers. Two general averages at the European level have been calculated: a simple average and a weighted average. The latter weights each country's average with the share of the country's subscribers (total subscribers per country / total European subscribers). In the case of the European weighted average, only the countries that reported TRs and the number of subscribers are taken into account. Since not all countries report complete sets of data, the calculated averages might vary slightly.

On the other hand and due to the generally unregulated environment existing for SMS TRs in most European countries, there is a high degree of bilateral negotiation among operators.

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¹¹ International SMS TRs in most European countries are also based on bilateral negotiations among operators, which generally result in higher levels than the domestic rates that are reflected in this report.

Therefore, some peculiarities in setting SMS TRs could emerge and require additional assumptions (as compared to the exercise of benchmarking the FTRs and the MTR):

- In some countries, operators have bilateral contract agreements implying different rates depending on the volume of SMS sent across the two networks. These non-linear relationships imply different average rates depending on the volume of SMS exchanged. In this case, the lowest average rate expected (corresponding to the highest volume of SMS) has been considered.
- Additionally, in some countries, operators will negotiate different SMS TRs vis-à-vis each one of the other operators. In this case, if not differently indicated, a TR simple average is considered.

Due to these considerations, for some countries the benchmarking proposed in this exercise may represent – with different levels of accuracy – the average SMS TR effectively charged for an off-net SMS.

For non-Euro countries, the exchange rates reported in the <u>Annex 10</u> are used.

For more information consult **Annex 9**: SMS TR per operator.

4.2. Average SMS TR per country and per message (as of July 2015)

Table 2 - Average SMS TR per country

Country	Average SMS TR per
Country	country (€cent)
AT	3.11
BE	4.96
BG	confidential
СН	4.90
CY	0.60
CZ	confidential
DE	n.a.
DK	0.15
EE	2.29
EL	3.00
ES	2.73
FI	confidential
FR	1.00
HR	n.a.

HU	4.57
IE	3.17
IS	2.61
IT	3.28
LI	5.07
LT	0.89
LU	n.a.
LV	2.13
ME	2.20
FYROM	0.81
MT	1.78
NL	5.60
NO	4.09
PL	1.22
PT	1.27
RO	2.66
RS	1.66
SE	3.23
SI	Bill and keep
SK	2.50
TR	0.15
UK	2.27
Average(S)	2.59
Average(W)	2.29

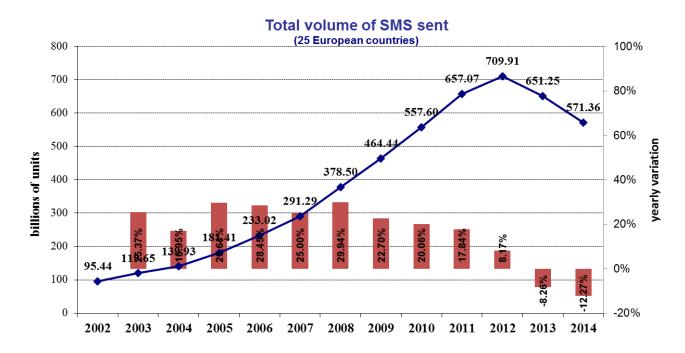
The increase of both averages can be explained to two factors:

- Significant negative impact of the exchange rates
- The inclusion of Serbia, which changed the regime from Bill & keep to a SMS TR regime

4.3. Volumes of SMS sent per country (2014)

Figure 18 is based on the time series of the countries from which information was available from 2002 to 2014. These countries are: Austria, Belgium, Croatia, Cyprus, Czech Republic, Denmark, Estonia, Finland, France, Germany, Greece, Iceland, Ireland, Italy, Lithuania, Malta, Norway, Poland, Portugal, Romania, Slovak Republic, Spain, Sweden, Switzerland and UK.

Figure 18 Volumes of SMS sent



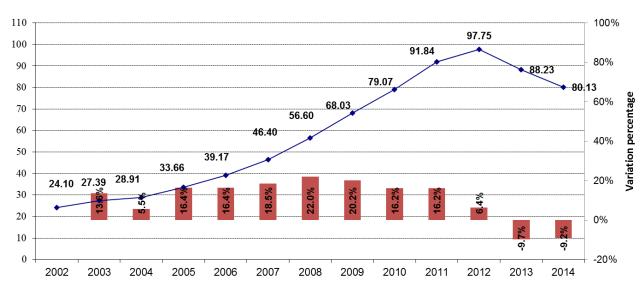
4.4. Interpersonal SMS per subscriber

Since SMS volume growth has two components (the development of usage, i.e. the change in consumer consumption and a variation in the number of subscribers), it is worth describing the SMS usage through the average number of SMS per subscriber per month for each country (and its variation in time).

Figure 19 describes the trend from 2002 on for the same 25 countries as in figure 18. For a given year, the weighted average is obtained through pondering the average number of interpersonal SMS per subscriber per month of each country by its relative part of total subscribers (used in the panel of countries).

Figure 19 SMS per subscriber per month

Weighted average number of interpersonal SMS sent per subscriber per month - 25 countries



Annex

Annex 1 Fixed termination rates as of 1 July 2015

Table 3

			Average e	ffective price pe €cents	er operator
Country	Operator	Layer	peak	Off-peak	WA
AT	Telekom Austria	Layer 1	0.1370	0.0850	0.1110
Ai	Other operators	Layer 1	0.1370	0.0850	0.1110
		Layer 1	0.6187	0.3247	0.5020
	Proximus	Layer 2	0.8747	0.4583	0.7090
BE		Layer 3	1.1213	0.4583	0.9090
	Other operators	Layer 1	0.8747	0.4583	0.7090
	Other operators	Layer 2	1.1213	0.5883	0.9090
	Bulgarian Telecommunication	Layer 2	0.2556	0.2556	0.2556
	Company	Layer 3	0.2556	0.2556	0.2556
BG	Mobiltel	Layer 3	0.2556	0.2556	0.2556
	Telenor Bulgaria	Layer 3	0.2556	0.2556	0.2556
	Blizoo Media and Broadband	Layer 3	0.2556	0.2556	0.2556
	Other operators	Layer 3	0.2556	0.2556	0.2556
СН	H Swisscom	Layer 2	1.0406	0.5411	0.8126
	C III C C C III	Layer 3	0.8098	0.4419	0.6615
		Layer 1	N/A	N/A	0.3420
	CYTA	Layer 2	N/A	N/A	0.5470
CV	PRIMETEL CABLENET	Layer 3	N/A	N/A	0.6320
CT		Layer 2	N/A	N/A	0.6320
		Layer 2	N/A	N/A	0.6320
	MTN FIXED	Layer 2	N/A	N/A	0.6320
	O2 Czech Republic a.s.	Layer 1	N/A	N/A	0.1096
	České Radiokomunikace a.s	Layer 2	N/A	N/A	0.1096
cz	Vodafone Czech Republic a.s.	Layer 2	N/A	N/A	0.1096
	GTS Czech s.r.o.	Layer 2	N/A	N/A	0.1096
	UPC Česká republika s.r.o.	Layer 2	N/A	N/A	0.1096
	T-Mobile Czech Republic a.s.	Layer 2	N/A	N/A	0.1096
DE	Telekom Deutschland GmbH	Layer 1	0.2400	0.2400	0.2400
		Layer 1	0.0523	0.0523	0.0513
DK	DK TDC	Layer 2	0.0523	0.0523	0.0513
		Layer 3	0.5539	0.3395	0.5217
	Elion	Layer 3	0.1020	0.1020	0.1020
EE	Starman	Layer 3	0.1020	0.1020	0.1020
	Elisa	Layer 3	0.1020	0.1020	0.1020
	STV	Layer 3	0.1020	0.1020	0.1020

	OTE	Layer 1	N/A	N/A	0.0695
		Layer 2	N/A	N/A	0.0695
	Forthnet	Layer 1	N/A	N/A	0.0695
		Layer 2	N/A	N/A	0.0695
EL	HOL	Layer 1	N/A	N/A	0.0695
		Layer 2	N/A	N/A	0.0695
	WIND	Layer 1	N/A	N/A	0.0695
		Layer 2	N/A	N/A	0.0695
	Other operators	Layer 1	N/A	N/A	0.0695
	Gillon operations	Layer 2	N/A	N/A	0.0695
	Telefónica de España	Layer 1	0.0817	0.0817	0.0817
	Vodafone - ONO	Layer 1	0.0817	0.0817	0.0817
ES	Orange	Layer 1	0.0817	0.0817	0.0817
LO	Vodafone	Layer 1	0.0817	0.0817	0.0817
	Jazztel	Layer 1	0.0817	0.0817	0.0817
	Other operators	Layer 1	0.0817	0.0817	0.0817
	Elisa Oyj	N/A	N/A	N/A	2.800
	DNA Oyj	N/A	N/A	N/A	2.800
FI	TeliaSonera Finland Oyj	N/A	N/A	N/A	2.800
	Average	N/A	N/A	N/A	2.800
	Orange	Layer 1	N/A	N/A	0.0790
FR	Other operators	Layer 1	N/A	N/A	0.0790
		Layer 1	0.0792	0.0391	0.0652
	HT	Layer 2	0.0792	0.0391	0.0652
HR	Optima Telekom	Layer 2	0.0792	0.0396	0.0661
	VIPnet	Layer 2	0.0792	0.0396	0.0646
	H1 Tolokom	Layer 1	0.0792	0.0396	0.0709
	H1 Telekom	Layer 2	0.0792	0.0396	0.0709
	Magyar Telekom	Layer 1	0.1307	0.1307	0.1307
		Layer 2	0.1307	0.1307	0.1307
		Layer 3	0.1307	0.1307	0.1307
1111		Layer 1	0.1307	0.1307	0.1307
HU	Invitel	Layer 2	0.1307	0.1307	0.1307
		Layer 3	0.1307	0.1307	0.1307
	UPC	Layer 1	0.1307	0.1307	0.1307
	Other operators		0.1307	0.1307	0.1307
		Layer 1	0.0007	0.0007	0.0716
IE	Eircom	Layer 2	0.0061	0.0033	0.5082
		Layer 3	0.0075	0.0041	0.6264
IC	Siminn	Layer 2	0.5668	0.5668	0.5668
IS	Vodafone	Layer 2	0.5668	0.5668	0.5668
	T-1 1: 1: 0 1	Layer 2	0.0430	0.0430	0.0430
	Telecom Italia S.p.A.	Layer 1	0.0430	0.0430	0.0430
IT	Wind Telecomunicazioni	Layer 1	0.0430	0.0430	0.0430
	5.p.A.	•		0.0400	0.0400
	Fastweb S.p.A.	Layer 1	0.0430	0.0430	0.0430
	Vodafone Omnitel B.V	Layer 1	0.0430	0.0430	0.0430
u	Telecom Liechtenstein AG	Layer 2	3.8425	3.8425	3.8425
	. orodoni Erodinoriotoni 710	_a, 0, 2	0.0 120	5.5 120	

	TEO LT AB	Layer 1	0.6111	0.6111	0.6111
LT	CSC Telecom	Layer1	0.6111	0.6111	0.6111
	Lietuvos gelezinkeliai	Layer 1	0.6111	0.6111	0.6111
	Liotavoo golozii ikollali	Layer 1	0.1400	0.1400	0.1400
LU	EPT	Layer 2	0.1400	0.1400	0.1400
	Lattelecom	Layer 1	0.1037	0.1037	0.1037
	Baltcom TV	Layer 1	0.1037	0.1037	0.1037
LV	CSC Telecom	-	0.1037	0.1037	0.1037
LV		Layer 1	0.1037	0.1037	0.1037
	Latvijas Dzelzsceļš	Layer 1			0.1037
	Latvijas Mobilais Telefons	Layer 1	0.1037	0.1037	
	Crnogorski Telekom	Layer 1	0.7400	0.7400	0.7400
ME	Crnogorski Telekom	Layer 2	0.9400	0.9400	0.9400
	Mtel	Layer 1	0.9400	0.9400	0.9400
		Layer 1	0.0047	N/A	0.4716
	Makedonski Telekom AD	Layer 2	0.0049	N/A	0.4878
=>/= ===	ONETI	Layer 3	0.0059 0.0059	N/A	0.5854 0.5854
FYROM	ONE Telecom services	Layer 3	0.0059	N/A	0.5854
	Robi Blizoo	Layer 3	0.0059	N/A N/A	0.5854
		Layer 3	0.0059	N/A	0.5854
	Other operators	Layer 3			
	GO plc	Layer 1	N/A	N/A	0.0443
	Melita plc	Layer 1	N/A	N/A	0.0443
MT	Vodafone	Layer 1	N/A N/A	N/A N/A	0.0443 0.0443
	Ozone Vanilla	Layer 1 Layer 1	N/A	N/A	0.0443
	SIS	Layer 1	N/A	N/A	0.0443
	KPN	Layer 2	N/A	N/A	0.3020
	Ziggo	Layer 2	N/A	N/A	0.3020
NL	UPC	Layer 2	N/A	N/A	0.3020
	Tele2	Layer 2	N/A	N/A	0.3020
	Telenor	Layer 1	0.3036	0.3036	0.3036
	Ventelo	Layer 1	0.3036	0.3036	0.3036
NO	Tele2	Layer 1	0.3036	0.3036	0.3036
	Telio	Layer 1	0.3036	0.3036	0.3036
		Layer 1	0.6678	0.3351	0.5014
	Orange Polska S.A.	Layer 2	0.7950	0.3963	0.5956
PL		Layer 3	1.1692	0.5846	0.8769
	NETIA	Layer 1	0.6678	0.6678	0.6678
	Multimedia PolsKa S.A.	Layer 1	0.6678	0.6678	0.6678
	TK Telekom	Layer 1	0.6678	0.6678	0.6678
		Layer 1	0.1026	0.1026	0.1026
	Meo	Layer 2	0.1411	0.1411	0.1411
		Layer 3	0.1642	0.1642	0.1642
PT	Nos Group	Layer 1	0.1114	0.1114	0.1114
	Vodafone	Layer 1	0.1114	0.1114	0.1114
	Onitelecom/Cabovisão	Layer 1	0.1114	0.1114	0.1114

	TELEKOM RC S.A. (former	Layer 1	N/A	N/A	0.1400
	Romtelecom)	Layer 2	N/A	N/A	0.1400
RO		Layer 3	N/A	N/A	0.1400
110	RCS&RDS S.A.	Layer 1	N/A	N/A	0.1400
	UPC Romania S.R.L.	Layer 1	N/A	N/A	0.1400
	VODAFONE ROMANIA S.A.	Layer 1	N/A	N/A	0.1400
		Layer 3	0.6228	0.6228	0.6228
	Telekom Srbija	Layer 2	0.5564	0.5564	0.5564
RS		Layer 1	0.4733	0.4733	0.4733
Ko	Orion telekom	Layer 1	0.5149	0.5149	0.5149
	Telenor	Layer 1	0.5149	0.5149	0.5149
	SBB	Layer 1	0.5149	0.5149	0.5149
SE	Taliana	Layer 2	N/A	N/A	0.0710
36	TeliaSonera	Layer 3	N/A	N/A	0.1151
		Layer 1	0.0876	N/A	0.0876
	Telekom Slovenije	Layer 2	0.0876	N/A	0.0876
SI		Layer 3	0.0876	N/A	0.0876
SI	Telemach	Layer 1	0.0876	N/A	0.0876
	T-2 Amis	Layer 1	0.0876	N/A	0.0876
		Layer 1	0.0876	N/A	0.0876
	Slovak Telekom	Layer 1	0.1234	0.1234	0.1234
SK	Orange Slovensko, a.s.	Layer 1	0.1234	0.1234	0.1234
SN.	Swan	Layer 1	0.1234	0.1234	0.1234
	UPC	Layer 1	0.1234	0.1234	0.1234
		Layer 1	N/A	N/A	0.4641
	Türk Telekom	Layer 2	N/A	N/A	0.5709
TR		Layer 3	N/A	N/A	0.7478
- IK	TTNet	Layer 3	N/A	N/A	1.0683
	Superonline	Layer 3	N/A	N/A	1.0683
	Turknet	Layer 3	N/A	N/A	1.0683
	ВТ	Layer 1	0.0624	0.0291	0.0485
	TalkTalk	Layer 1	0.0624	0.0291	0.0485
UK	Virgin Media	Layer 1	0.0624	0.0291	0.0485
	Vodafone	Layer 1	0.0624	0.0291	0.0485
	Sky	Layer 1	0.0624	0.0291	0.0485

Notes to Table 3

Incumbents per country are indicated first.

BE: The same levels are applicable to other operators. However they usually provide L2 IC (except a cable incumbent that also provides L3).

Average FTRs are not based on actual data (i.e. revenues/volumes) as no data is available for each layer. Rather, the 'average FTR' per minute per Layer is calculted by de-averaging the

setup/conveyvance and peak/off-peak tariffs (peak/off-peak gradient is 1,22/0,64 and the setup amounts to 16% of the total cost a 3,2 minute call).

BG: The incumbent' core network is conditionally divided into two logical hierarchy levels: upper logical hierarchy level (national) and lower logical hierarchy level (formal local and regional layers). The segmentation is based on geographical codes served by the media gateways in the network. The applied fixed terminating rate is cost-oriented based on Pure Bu-LRIC model— 0,005 BGN/minute and there is no differentiation between peak/off-peak or hierarchy levels.

CH: A "clause of reciprocity" is in place, meaning that the tariffs of other operators have to be same as those of Swisscom.

CY: Only one rate applies. No seperation of rates to peak and off-peak. No data exist per layer. CYTA uses layer 1 interconnection for local and regional coverage and layer 2 for national coverage. Alternative operators use layer 2 interconnection.

CZ: In the Czech Republic hypothetic Layer 3 with national coverage can be achieved through transit of traffic between two regional POI. However, this is not supposed to be part of fixed termination and transit prices are not regulated. Currently all OLOs active on the relevant market are interconnected only on Layer 2 (regional coverage). Data, incl. list of operators, relate to 1st January 2015.

EL:

- 1) Since 1/1/2014 there is no distinction between peak and off peak FTRs.
- 2) Since 28/5/2014 (a) there is no difference between the FTRs of Layer 1 and Layer 2 and (b) Layer 3 is a non-regulated interconnection layer (the respective FTR cannot be defined since the transit rate has been deregulated).

FI: The answers include three biggest operators in terms of market share and other FNOs. Other FNOs' FTR is simple average. In Finland there are about 30 fixed telephony operators.

FR: FTR average per minute for the incumbent includes a capacity-based component: derived from a unit price of 874,80 euros per E1 per year, divided by an average load of 2.5 million minutes per E1 per year.

HR: Please note that interconnection at national level with HT is not regulated anymore (Decision of HAKOM form 31 March 2015 on market analysis of market M1). HT can offer interconnection at national level, but this is now based on commercial offer. Therefore, this time HAKOM did not fill in data for Layer 3 (national level) of HT like it did for previous years.

IE: Please note that ComReg Decision D12/12 set fixed termination rates at layer one (ie ericom's primary). ComReg Decision D12/12 imposed symmetrical blended rate of 0.085 cent per minute for all SMP fixed operators from 1 July 2014. This blended FTR will reduce to to 0.072 cent per minute from 1 July 2015. Please refer to Annex1 in ComReg Decision D12/12 at http://www.comreg.ie/_fileupload/publications/ComReg12125.pdf

IS: Single Transit - FTR average calculated for a 3 minute call.

LI: Note to 1.4 Distribution of traffic: Telecom Liechtenstein AG does not use differentiated Peak/Offpeak FTRs.

LT: Data as of 2015 IQ. Due to currency changes: till 31/12/2014 FTRs were 2,11 LTL ct/min, after 01/01/2015 - FTRs are 0,61 EUR ct/min. (exchange rate 1 EUR : 3,45280 LTL). In table above, FTRs are in euros.

LU: FTRs applicable since of: 01/013/2015. The regulation defines only a maximal price cap and operators may implement the solution in their own way; no distinction of layers in the regulation.

PT: Termination price is charged on a per second basis from the first second. There is no differentiation on prices concerning peak and off peak hours. Note that Altice Group in July 2015 included Cabovisão, OniTelecom and MEO. Nevertheless in the table above TRs are presented separately because of the differences in interconnection **prices and** layers between MEO and Onitelecom/ Cabovisão.

TK: In Turkey, there is no differentiation such as peak and off-peak.

UK: BT is subject to a charge control where the average price cap for the year must equal 0.035ppm. BT is free to set prices within this cap. BT has set different rates for day, evening and weekend traffic. The off-peak rate shown above corresponds to the evening rate. Its weekend rate is 0.016ppm. As stated above, all other CPs must set rates that are fair and reasonable rates, which are presumed to be symmetric to BT.

Annex 2 Average revenue per minute (all operators) for the whole 2014

Notes to Figure 10

BE: Termination indicated is to geographical numbers.

BG: Data filled in the table refers to year 2014. Data includes traffic and revenue from international incoming calls terminated in fixed networks. Revenues and traffic terminated in non-geographic numbers in fixed networks are not included in the questionnaire. Cost-oriented fixed terminating rates based on Pure Bu-LRIC model are in force – 0,005 BGN/minute. No FTRs differentiation between peak/off-peak or interconnection levels.

CH: The data is not collected.

CY: FTR unchanged during the reported period.

DK: There is no data for the total FTR revenue in Denmark. Instead, the average DKK revenue per minute can be calculated by the average length of a phonecall (3,24 min.), the price for one minut (0,45) and the start-up charge of 0,48, which then equals 0,00598 DKK/min.

EL: The FTRs rates for the period 1/1/2014- 27/5/2014 were defined by EETT with 2 decisions, on 13/6/2014 for the incumbent and on 26/3/2013 for the alternative operators, according to the 2nd round of Market Analysis - Decision EETT 573/017/22-7-2010 (Official Gazette 1353/1-09-2010). Additionally the FTRs changed on 28/4/2014 with reference to the period 28/5/2014-31/12/2014, as a result of the 3nd round of Market Analysis -Decision EETT 714/09/10-4-2014 (Official Gazette 1049/28-04-2014).

ES: The FTR changed from November 1st 2015 onwards. Reported figures include the total amount of operators in CNMC's Annual Report'14.

HR: FTRs for the year 2014 were not based on pure BU-LRIC model and therefore were higher than set for 2015.

IE: The data relates to Eircom's traffic only. There is no separation for National, Regional or Local termination available.

IT: Estimated data. Since FTRs are symmetric (with respect to the level of termination), AGCOM does not distinguish between national and local FTRs.

LI: Liechtenstein has only one fixed net operator (Telecom Liechtenstein AG), and three mobile operators (one of them being Telecom Liechtenstein AG). The figures comprise all terminated traffic, regardless of origin.

LT: LT national currency is euro from 01/01/2015. Since data is for 2014, Litas national currency was used with the respective exchange rate to calculate the revenues.

LV: FTRs were reduced by 90 % from 01.07.2014.

LU: No distinction between national-regional-local fixed termination.

ME: FTR for calls that are originated from abroad are not regulated. FTR are changed from 01. November of 2014 for national calls (fixed and mobile). Data for January (0.94 euro cent/min) included only revenues from calls that originate in national networks in Montenegro.

Data for July (5.98 euro cent / min) included all revenues, from calls that originate in national networks and calls that are originated from abroad.

NO: NPT has not sufficient data to provide accurate results. However, we've made an estimate based on the termination volume reported 2014 and the termination price on the incumbent's network in 2014. **RO:** FTRs changed in April 2014.

SI: National FTR revenues and minutes also include traffic terminated in fixed network on premium numbers, numbers for televoting, mass calling and short dialling numbers.

SK: In 2014 some operators provided interconnection also on regional and local levels. From 2015 only on national levels based on the transition to IP networks.

Annex 3 FTR regulatory model implemented

AT Pure BU LRIC BE TD BG Pure BU LRIC CH BU LRAIC+ CY TD CZ Pure BU LRIC DE BU LRAIC+ DK Pure BU LRIC EE Benchmark EL Pure BU LRIC ES Pure BU LRIC FI FDC FR BU-LRIC HR Pure BU LRIC HR Pure BU LRIC IE Pure BU LRIC LI TD LT BU LRIC LI TD LT BU LRIC LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NO LRAIC NO LRAIC PL TD LT BU LRAIC+ NO LRAIC PT Benchmark	O manufacture	COST ACCOUNTING		
BE TD BG Pure BU LRIC CH BU LRAIC+ CY TD CZ Pure BU LRIC DE BU LRAIC+ DK Pure BU LRIC EE Benchmark EL Pure BU LRIC ES Pure BU LRIC FI FDC FR BU-LRIC HR Pure BU LRIC IE Pure BU LRIC IE Pure BU LRIC II Pure BU LRIC II Pure BU LRIC LI TD LT BU LRIC LU Pure BU LRIC LU Pure BU LRIC LU Pure BU LRIC LU Pure BU LRIC LI TD LT BU LRAIC+ LU Pure BU LRIC LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PL TD PT Benchmark	Country	MODEL		
BG Pure BU LRIC CH BU LRAIC+ CY TD CZ Pure BU LRIC DE BU LRAIC+ DK Pure BU LRIC EE Benchmark EL Pure BU LRIC ES Pure BU LRIC FI FDC FR BU-LRIC HR Pure BU LRIC IE Pure BU LRIC IS Other IT Pure BU LRIC LI TD LT BU LRIC LU Pure BU LRIC LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PT Benchmark	AT	Pure BU LRIC		
CH BU LRAIC+ CY TD CZ Pure BU LRIC DE BU LRAIC+ DK Pure BU LRIC EE Benchmark EL Pure BU LRIC ES Pure BU LRIC FI FDC FR BU-LRIC HR Pure BU LRIC IE Pure BU LRIC IS Other IT Pure BU LRIC LI TD LT BU LRIC LU Pure BU LRIC LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NO LRAIC+ NO LRAIC PT Benchmark	BE	TD		
CY TD CZ Pure BU LRIC DE BU LRAIC+ DK Pure BU LRIC EE Benchmark EL Pure BU LRIC ES Pure BU LRIC FI FDC FR BU-LRIC HR Pure BU LRIC HU Pure BU LRIC IE Pure BU LRIC IS Other IT Pure BU LRIC LI TD LT BU LRIC LU Pure BU LRIC LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NO LRAIC+ NO LRAIC PL TD PT Benchmark	BG	Pure BU LRIC		
CZ Pure BU LRIC DE BU LRAIC+ DK Pure BU LRIC EE Benchmark EL Pure BU LRIC ES Pure BU LRIC FI FDC FR BU-LRIC HR Pure BU LRIC HU Pure BU LRIC IE Pure BU LRIC IS Other IT Pure BU LRIC LI TD LT BU LRIC LU Pure BU LRIC LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PL TD PT Benchmark	СН	BU LRAIC+		
DE BU LRAIC+ DK Pure BU LRIC EE Benchmark EL Pure BU LRIC ES Pure BU LRIC FI FDC FR BU-LRIC HR Pure BU LRIC HU Pure BU LRIC IE Pure BU LRIC IS Other IT Pure BU LRIC LI TD LT BU LRAIC+ LU Pure BU LRIC LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PL TD PT Benchmark	CY	TD		
DK Pure BU LRIC EE Benchmark EL Pure BU LRIC ES Pure BU LRIC FI FDC FR BU-LRIC HR Pure BU LRIC HU Pure BU LRIC IE Pure BU LRIC IS Other IT Pure BU LRIC LI TD LT BU LRAIC+ LU Pure BU LRIC LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PT Benchmark	CZ	Pure BU LRIC		
EE Benchmark EL Pure BU LRIC ES Pure BU LRIC FI FDC FR BU-LRIC HR Pure BU LRIC HU Pure BU LRIC IE Pure BU LRIC IS Other IT Pure BU LRIC LI TD LT BU LRAIC+ LU Pure BU LRIC LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PT BU LRIC PT BU LRIC	DE	BU LRAIC+		
EL Pure BU LRIC ES Pure BU LRIC FI FDC FR BU-LRIC HR Pure BU LRIC HU Pure BU LRIC IE Pure BU LRIC IS Other IT Pure BU LRIC LI TD LT BU LRAIC+ LU Pure BU LRIC LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PL TD PT Benchmark	DK	Pure BU LRIC		
ES Pure BU LRIC FI FDC FR BU-LRIC HR Pure BU LRIC HU Pure BU LRIC IE Pure BU LRIC IS Other IT Pure BU LRIC LI TD LT BU LRAIC+ LU Pure BU LRIC LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PL TD PT Benchmark	EE	Benchmark		
FI FDC FR BU-LRIC HR Pure BU LRIC HU Pure BU LRIC IE Pure BU LRIC IS Other IT Pure BU LRIC LI TD LT BU LRAIC+ LU Pure BU LRIC LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PL TD PT Benchmark	EL	Pure BU LRIC		
FR BU-LRIC HR Pure BU LRIC HU Pure BU LRIC IE Pure BU LRIC IS Other IT Pure BU LRIC LI TD LT BU LRAIC+ LU Pure BU LRIC LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PL TD Benchmark	ES	Pure BU LRIC		
HR Pure BU LRIC HU Pure BU LRIC IE Pure BU LRIC IS Other IT Pure BU LRIC LI TD LT BU LRAIC+ LU Pure BU LRIC LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PL TD Benchmark	FI	FDC		
HU	FR	BU-LRIC		
IE	HR	Pure BU LRIC		
IS	HU	Pure BU LRIC		
T	IE	Pure BU LRIC		
LI TD LT BU LRAIC+ LU Pure BU LRIC LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PL TD PT Benchmark	IS	Other		
LT BU LRAIC+ LU Pure BU LRIC LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PL TD PT Benchmark	IT	Pure BU LRIC		
LU Pure BU LRIC LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PL TD PT Benchmark	LI	TD		
LV Benchmark FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PL TD PT Benchmark	LT	BU LRAIC+		
FYROM TD LRIC ME HCA-FDC MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PL TD PT Benchmark	LU	Pure BU LRIC		
ME HCA-FDC MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PL TD PT Benchmark	LV	Benchmark		
MT Pure BU LRIC NL BU LRAIC+ NO LRAIC PL TD PT Benchmark	FYROM	TD LRIC		
NL BU LRAIC+ NO LRAIC PL TD PT Benchmark	ME	HCA-FDC		
NO LRAIC PL TD PT Benchmark	MT	Pure BU LRIC		
PL TD PT Benchmark	NL	BU LRAIC+		
PT Benchmark	NO	LRAIC		
	PL	TD		
DO DUILDIO	PT	Benchmark		
KO Pure BU LRIC	RO	Pure BU LRIC		
RS TD-FAC-CCA	RS	TD-FAC-CCA		
SE Pure BU LRIC	SE	Pure BU LRIC		
SI Pure BU LRIC	SI	Pure BU LRIC		
SK Pure BU LRIC	SK	Pure BU LRIC		
TR BU LRAIC+	TR	BU LRAIC+		
UK Pure BU LRIC	UK	Pure BU LRIC		

Notes to Figure 11

BG: With Decision 134 from 14 February 2013 CRC approved cost-oriented fixed termination rates based on a Pure Bu-LRIC model. There is no differentiation between peak/off-peak or interconnection levels.

CH: Source of the Swisscom-Tariffs: https://www.swisscom.ch/dam/swisscom/de/ws/documents/D_IC-Dokumente/Handbuch%20Preise_IC_V1-12.pdf, p.11

CY: Termination rates are calculated on TD-LRAIC basis. The rates for all the operators that were found to have significant market power are based on CYTA's rates (incumbent). A BU LRIC model is currently being developed.

CZ: According to a final determination made in August 2014, the level of FTRs is set to 0.03 CZK per minute. The calculation of FTRs has been based on pure BU-LRIC model. For the purposes of FTR regulation, CTU has determined one level of FTRs without differentiation between peak and off-peak periods.

DE: There is no glide path regulation. FTRs are valid from 1 December 2014 until 31 December 2016. The decision is preliminary and still subject to a Phase II investigation.

EE: Benchmark: Incumbent's FTR

EL A Pure BU LRIC model is applied since 28 May 2014 as a result of EETT's decision 714/09/10-4-2014 (Official Gazette 1049/28-04-2014).

ES: From 1 November 2015 onwards, new regulation for FTR will be applied. There is no separation between peak and off-peak and only the local level is regulated.

IE: In relation to fixed termination for Layer 1 (i.e. primary) ComReg Decision D12/12 imposed symmetrical blended rate of 0.085 cent per minute for all SMP fixed operators from 1 July 2014. This blended FTR will reduce to 0.072 cent per minute from 1 July 2015. Please refer to Annex 1 in ComReg Decision D12/12 at http://www.comreg.ie/_fileupload/publications/ComReg12125.pdf

IS: The country is a single interconnection area with one pricing structure and single transit. The cost model is based on historical Costs and the target rate was reached by 4 December 2012.

IT: AGCOM has developed a BU-LRIC model for determining IP termination rates, which has been applied from 1st July 2015. Rate in the first semester 2015 is a weighted average between the IP rate determined by the model and a pure LRIC TDM rate. The weights are 66% IP and 34% TDM.

LI: Current FTR was decided in 2007. Market analysis and remedies M3 decided in 2010. New FTR decision expected in 2016, based on TD-FDC and Benchmarking. (EFTA Surveillance Authority Recommendation of 13 April 2011 on the Regulatory Treatment of Fixed and Mobile Termination Rates in the EFTA States)

LT: Currently prices of fixed termination market are not regulated, but SMP operators apply the same rates as were set previously (0,61 euro cent/min). RRT is finalising its market research and new prices, based on BU-LRAIC, will be set after completion of this analysis. There is no separation between peak and off-peak FTRs

LU: Regulation decision 15/186/ILR of 3th February 2015 on FTRs /M3-2007... [RÈGLEMENT 15/186/ILR du 3 février 2015, Portant sur la fixation des plafonds tarifaires pour les prestations de la terminaison d'appel sur divers réseaux téléphoniques publics individuels en position déterminée (Marché 3/2007), consultation nationale et internationale finalisée]

ME: Current prices are regulated according to the HCA FDC costing methodology.

FYROM: The current prices are calculated according to Top Down LRIC for the incumbent operator and approved by the Agency.

PT: ANACOM has set the fixed termination rates by benchmarking against BU pure LRIC prices in Denmark, France, Ireland, Malta, Bulgaria, Austria and Slovakia.

These prices have been in place from 1 October 2013 and they will be replaced by new prices based on the results of the pure LRIC model developed for that purpose.

Based on the referred benchmark, ANACOM set a pure LRIC price per minute of 0.1114 euro cents. In light of MEO's interconnection structure, which is comprised of three different interconnection levels (local, single transit and double transit), there are different prices for each level, but on average the price applied is 0.1114 euro cents.

RO: For Telekom RC S.A. (former Romtelecom S.A.) the 0.14 euro cents/min FTR applies irrespective of the interconnection level.

SK: No glide path is in use.

TR: The FTRs of the incumbent fixed operator is set according to a BU LRIC+ cost model. In addition, these values are close to the costs which are calculated in the model.

Annex 4 FTR symmetry

The following table emphasises the level of **symmetry** among the operators when interconnection in fixed networks is offered. The information below is directly reported by each NRA explaining its particular situation.

Table 4

Country	Symmetry	Comments
AT	YES	
BE	YES	
BG	YES	
СН	YES	Symmetry is ensured on the basis of geographical coverage from a certain point of interconnection (e.g. regional termination is priced the same both ways regardless of actual network hierarchy). Symmetry is evaluated on the basis of average FTRs (i.e. pricing flexibility is left for operators).
CY	YES	The alternative operators' termination rate was set at the incumbent's (CYTA) national rate (0,632 euro cents).
CZ	YES	
DK	YES	Same FTR apply to all 35 price regulated operators, cf. market decisions as of December 18, 2013.
DE	YES	More than 50 alternative fixed network operators (i. e. BT Germany, Telefónica Germany, Verizon, Versatel, Vodafone et al) have applied to have their FTR approved symmetrically, based on a tariff comparison with the approved Telekom Deutschland GmbH FTR.
EE	YES	Symmetry is ensured on the basis of a calculation of a per minute call charge through a 3 minute call duration.
EL	YES	Symmetry applies since 28 May 2014.
ES	YES	The FTR is symmetric for all the operators, since November 2014 (market analysis decision).
FI	PARTIALLY	In Finland there are no price caps on FTRs. FTRs are symmetrical among most of fixed operators.
FR	YES	
HR	YES	Symmetry in fixed network is prescribed for all operators as of the 1 January 2013.
HU	YES	

ΙE	PARTIALLY	ComReg Decision D12/12 set fixed termination rates at layer one (i.e. ericom's primary). ComReg Decision D12/12 imposed symmetrical blended rate of 0.085 cent per minute for all SMP fixed operators from 1 July 2014. This blended FTR will reduce to 0.072 cent per minute from 1 July 2015. Please refer to Annex1 in ComReg Decision D12/12 at http://www.comreg.ie/_fileupload/publications/ComReg12125.pdf
IS	YES	
IT	YES	
ш	NO	There is only one fixed network operator in Liechtenstein: Telecom Liechtenstein AG. National interconnecting partners are MNOs.
LT	YES	FTRs of all fixed operators with SMP are symmetric, i.e. the FTRs are the same irrespective of the number of customers, the difference in network topologies and so on.
LU	PARTIALLY	The regulation defines only a maximal price cap and operators may implement the solution in their own way.
LV	YES	
ME	YES	
FYROM	YES	
MT	YES	Due to national characteristics interconnection is at layer 1. The FTR charge applicable to all those operators having an SMP in the wholesale fixed termination market is on a symmetrical basis.
NL	YES	
NO	YES	Symmetric FTRs are imposed for all SMP operators in Norway.
PL	YES	
PT	YES	Prices applied by operators with SMP in the wholesale markets for call termination on the public telephone network at a fixed location must be symmetric and they were set at the level of 0.1114 euro cents per minute. With regard to MEO: Local, single and double transit prices were weighted according to traffic volumes and the average price is 0,1114 eurocents. For the other SMP operators: If the operator offers a pricing structure with several levels of interconnection prices, the applicable termination prices may not exceed the maximum prices established for the local, single and double transit charged by MEO. If the operator decides to offer a simplified pricing structure with only one level of prices, the termination rate may not exceed 0.1114 EUR cents per minute. All SMP operators shall apply a per second billing system that does not include any set-up fee.
RO	YES	Symmetric FTRs for all SMP operators.
RS	PARTIALLY	Operators have different network topologies and different number of levels of interconnection. Telekom Srbija (incumbent) have 3 levels of interconnection. Other operators have 1 level of interconnection. Other operators have unique FTR, which is calculated as weighted

		average price based on incumbent`s FTRs for 3 levels of interconnection and traffic volume.
SE	YES	The incumbent is regulated with a cost orientation obligation, whilst all other operators have an obligation to set fair and reasonable prices. The definition of fair and reasonable is in line (symmetric) with the cost oriented price of the incumbent.
SI	YES	Rates are based on a national coverage layer.
SK	YES	All SMP operators have applied the symmetrical FTRs.
TR	NO	
UK	YES	Termination is regulated only at the point of interconnection closest to the called customer. At this point, BT has rates set via a charge control. All other CPs' rates are required to be set on fair and reasonable terms, and it is presumed that this means rates should be symmetric with the charge controlled rates unless the CP can demonstrate why a higher rate is necessary and in the interests of consumers. Rates for regional and national level interconnection are not regulated.

Annex 5 Market shares

Table 5 Market shares

	Operator	Number of lines	Total number of lines	Market shares
	A1 Telekom Austria	2,150,116		65.70%
l i	Operator 2	478,152	3,271,621	14.60%
i	Operator 3	214,126		6.50%
AT	Operator 4	79,566		2.40%
i	Operator 5	50,155		1.50%
	Operator 6	49,261		1.50%
	Other operators	250,245		7.60%
D.F.	Proximus	2,700,488		59,6
BE	Other operators	1,831,987	4,532,475	40,4%
	Bulgarian Telecommunication Company	Confidential		66.18%
į	Telenor Bulgaria	Confidential		14.54%
BG	Mobiltel	Confidential	Confidential	10.45%
	Blizoo Media and Broadband	Confidential	Connuential	7.77%
	Other operators	Confidential		1.06%
OII	Swisscom	N/A	N/A	N/A
СН	Other operators	N/A	N/A	N/A
	CYTA	276,059	- 331,569	83.26%
ov.	PRIMETEL	30,191		9.11%
CY	CABLENET	23,282		7.02%
	MTN FIXED	2,037		0.61%
	O2 Czech Republic a.s.	Confidential		46.7%
	UPC Česká republika s.r.o.	Confidential		9.1%
	Vodafone Czech Republic a.s.	Confidential		6%
CZ	GTS Czech s.r.o.	Confidential	Confidential	4.5%
	České radiokomunikace a.s.	Confidential		3.7%
	T-Mobile Czech Republic a.s.	Confidential		3.5%
	Other operators	Confidential		26.5%
	Telekom Deutschland GmbH	20,660,000	36,890,000	56.0%
DE	Other operators	16,230,000	30,000,000	44.00%
	TDC	756,822	0.40 5 15	79,7%
DK	Other operators	192,527	949,349	20,3%
	Eesti Telekom	333,063		81.80%
EE	Starman	34,857	407,287	8.60%

	Elisa	14,066		3.50%
	STV	14,127		3.50%
	Other operators	11,174		2.70%
	OTE	2,746,707		57.72%
	FORTHNET	Confidential		Confidential
	HOL	Confidential	4,758,271	Confidential
	WIND	Confidential		Confidential
EL	Other operators	Confidential		Confidential
	Telefónica de España	10,218,956		53.28%
	Vodafone-Ono	2,107,138		10.99%
F0	Orange	2,016,487	19,179,861	10.51%
ES	Vodafone	1,833,494		9.56%
	Jazztel	1,761,168		9.18%
	Other operators	1,242,618		6.48%
	DNA Oyj			13.5%
FI	Elisa Oyj	N/A	N/A	39.0%
	TeliaSonera Oyj			23.5%
	Other operators			24.0%
	Orange			
FR	Other operators	Confidential	38,807,000	Confidential
	HT	920,541		63.02%
	OPTIMA	154,364		10.57%
HR	VIPnet	153,512	1,460,728	10.51%
	H1	90,345		6.18%
	Other operators	141,966		9.72%
	Magyar Telekom	1,669,145		55.50%
	Invitel	388,768	3,009,264	12.90%
HU	UPC	489,965		16.30%
	Other operators	461,386		15.30%
IE	Eircom	Confidential	Confidential	44.00%
	Siminn	89,014	126,745	70.20%
IS	Vodafone	37,731	120,110	29.80%
	Telecom Italia S.p.A.	12,477.390		60.62%
IΤ	Wind Telecomunicazioni	2,714.907		13.19%

	Fastweb S.p.A.	2,115.412	20,581,426	10.28%
	Vodafone Omnitel B.V. (including TeleTu S.p.A.)	2,010.861		9.77%
	Other operators	1,262.856		6.14%
u	Telecom Liechtenstein AG	17,487	17,487	100.00%
	TEO LT AB	487,910		91.60%
į	CSC Telecom	10,364		1.90%
LT	Lietuvos gelezinkeliai	5,442	532,572	1.00%
	Other operators	28,856	1	5.50%
i	Lattelecom	287,584		78.31%
i	CSC Telecom	11,087		3.02%
i	Latvijas Dzelzsceļš	6,197		1.69%
LV	Baltcom TV	11,607	367,245	3.16%
i	Latvijas Mobilais Telefons	35,051		9.54%
i	Other operators	15,719		4.28%
i	EPT	207,600		76.58%
LU	Other operators	63,500	271,100	23.42%
ME	Crnogorski Telekom	162,613	165,151	98.5%
IVIL	Mtel	2,538		1.5%
i	Makedonski Telekom AD	225,603		58.8%
i	ONE Telecom services	59,266	202 502	15.5%
FYROM	Robi	24,471	383,590	6.4%
i	Blizoo	42,763	-	11.1%
l i	Other operators	31,487		8.2%
i	Go plc	153,258	220.062	66.40%
l i	Melita plc	76,160	230,962	33.00%
	Vodafone	495		0.20%
MT	Ozone	784		0.30%
l i	SIS	211		0.10%
l i	Vanilla	54		0.00%
İ	KPN			
NL	Ziggo	21/2		21/2
	UPC	N/A	N/A	N/A
	Tele2			
	Telenor	768,496		63.80%
	Ventelo	36,244	1,204,994	3.00%
NO	Tele2	50,995		4.20%
	Telio	70,422		5.80%
	Other operators	278,837		23.10%
PL	Orange Polska S.A.	Confidential	5,477,447	Confidential

Multimedia Polska S.A. Confidential S1.87% 31.90% 11.07% 4.77%		NETIA	Confidential		Confidential
Multimedia Polska Poludnie S.A. Confidential			Confidential		Confidential
Other operators Confidential		Multimedia Polska Poludnie S.A.	Confidential		Confidential
PT		TK Telekom	Confidential		Confidential
NOS Group Confidential NOS Group Confidential A,640,507 11.07% 11.07% 11.07% 11.07% 11.07% 12.07%		Other operators	Confidential		Confidential
PT		MEO	Confidential		51.87%
Pi		NOS Group	Confidential		31.90%
Onitelecom/Cabovisão Confidential Other operators Confidential Other operators Confidential Confi	PT	Vodafone	Confidential	4.640.507	11.07%
TELEKOM RC S.A. Confidential RCS&RDS S.A. Confidential Section 2,747,151		Onitelecom/Cabovisão	Confidential	1,610,601	4.77%
RCS&RDS S.A. Confidential UPC Romania S.R.L. Confidential Section 2,747,151 96.2% 3.8% 3.8% 3.8% 3.8% 3.8% 3.8% 3.8% 3.8% 3.8% 3.8% 3.8% Confidential Comparison 2,708,600 Comparison 2,708,600 Comparison 3,779,000 6.60% 1.50% 2.20% 2		Other operators	Confidential		0.38%
RO		TELEKOM RC S.A.	Confidential		Confidential
RO		RCS&RDS S.A.	Confidential	4,564,196	Confidential
VODAFONE ROMANIA S.A. Confidential Other operators Confidential Confidential Confidential Confidential Confidential Confidential Confidential Confidential Section Confidential Confidential Section Confidential Section Confidential Section Confidential	RO	UPC Romania S.R.L.	Confidential		Confidential
Telekom Srbija 2,747,151 96,2% 3,8%		VODAFONE ROMANIA S.A.	Confidential		Confidential
SE		Other operators	Confidential		Confidential
TeliaSonera 2,708,600 71.70% 8.90% 71.70% 8.90% 71.70% 8.90% 71.70% 8.90% 71.70% 8.90% 71.70% 8.90% 71.50%		Telekom Srbija	2,747,151		96.2%
Comhem 337,100 8.90% Telenor 250,100 3,779,000 6.60% Alltele 58,400 1.50% TelaVox 82,900 9.00% Telekom Slovenije Confidential Telemach Confidential Telemach Confidential Amis Confidential Other operators Confidential Other operators Confidential Other operators Confidential Orange Slovensko Confidential Orange Slovensko Confidential UPC Confidential Türk Telekom 10,244,998 Türk Telekom 10,244,998 Türk Telekom 1,181,714 Superonline 356,495 Turknet 217,858 Other operators 444,518 Other operators 444,518 BT Confidential Co	RS	Other operators	108,983	2,856,134	3.8%
Telenor		TeliaSonera	2,708,600		71.70%
SE		Comhem	337,100	3,779,000	8.90%
Alltele	o-F	Telenor	250,100		6.60%
Other operators 341,900 9.00%	SE	Alltele	58,400		1.50%
Telekom Slovenije		TelaVox	82,900		2.20%
Telemach Confidential T-2 Confidential Confidential 19.20% 11.40% 11.40% 6.00% 5.70% 5.70%		Other operators	341,900		9.00%
T-2 Confidential 11.40% 6.00% 6.00% 6.00% 6.00% 6.00% 6.00% 6.00% 6.00% 6.00% 6.00% 6.00% 6.00% 6.00% 6.00% 6.00% 6.01%		Telekom Slovenije	Confidential		57.70%
T-2 Confidential 11.40% 6.00%		Telemach	Confidential	Confidential	19.20%
Other operators Confidential 5.70% SK Slovak Telekom* Confidential Orange Slovensko Confidential 84.24% Confidential 8.21% Confidential 6.01% UPC Confidential Türk Telekom 10,244,998 TTNet 1,181,714 Superonline 356,495 Turknet 217,858 Other operators 444,518 Confidential UK BT Confidential Confidential Confidential	SI	T-2	Confidential	Cormaonia	11.40%
Slovak Telekom* Confidential Orange Slovensko Confidential Swan Confidential Confidential		Amis			6.00%
Orange Slovensko Confidential Confidential 8.21% Swan Confidential 6.01% UPC Confidential 1.54% Türk Telekom 10,244,998 82.32% TTNet 1,181,714 9.50% Superonline 356,495 1.75% Turknet 217,858 1.75% Other operators 444,518 3.57% BT Confidential Confidential		Other operators			5.70%
SK Swan Confidential 6.01% UPC Confidential 1.54% Türk Telekom 10,244,998 82.32% TTNet 1,181,714 9.50% Superonline 356,495 1.75% Turknet 217,858 1.75% Other operators 444,518 3.57% BT Confidential Confidential UK 33,298,000 Confidential					
Swan Confidential 6.01%	SK			Confidential	
Türk Telekom 10,244,998 TTNet 1,181,714 Superonline 356,495 Turknet 217,858 Other operators 444,518 BT Confidential UK 82.32% 9.50% 2.86% 1.75% 3.57% Confidential	SK				
TR Superonline 356,495 Turknet 217,858 Other operators 444,518 BT Confidential 33,298,000		UPC			
TR Superonline 356,495 12,445,582 2.86% Turknet 217,858 1.75% Other operators 444,518 3.57% BT Confidential Confidential 33,298,000 Confidential	TR	Türk Telekom			
TR Superonline 356,495 2.86% Turknet 217,858 1.75% Other operators 444,518 3.57% BT Confidential Confidential UK 33,298,000		TTNet	·	12,445,582	
Other operators 444,518 3.57% BT Confidential Confidential		Superonline	·	, , , , , , , , , , , , , , , , , , , ,	
BT Confidential Confidential		Turknet	·		
UK 33 298 000		Other operators	·		
TalkTalk Confidential 33,290,000 Confidential	UK	BT		33 308 000	
45		TalkTalk		33,290,000	Confidential

Sky	Confidential	Confidential
Virgin Media	Confidential	Confidential
Vodafone	Confidential	Confidential
Other operators	Confidential	Confidential

Notes to Table 5

BG: Data in the field "Number of lines" refers to the number of fixed telephone lines as of 1st of January 2015.

CY: No data exist per layer. CYTA uses Layer 1 interconnection for local and regional coverage and Layer 2 for national coverage. Alternative operators use Layer 2 interconnection. Number of lines as at 31/12/2014.

CZ: The data provided is based on the total number of lines at the highest interconnection level. The number of lines is based on figures as of 1 January 2015 – data for the first half of the year 2015 are not yet available.

DE: The number of lines is based on figures from 2014. Source: BNetzA Annual Report 2014.

DK: lines and markets shares refer to 2013-2014.

EL: Data refers to the number of active telephone access lines as at 31.12.2014. The wholesale line rental lines are included in the incumbent's (OTE) lines.

FI: Market shares in terms of subscriptions as of 31.12.2014.

FR: Total number of lines by the end of 2014.

IE: Market share refers to the number of subscriptions as opposed to lines.

MT: Data reflects position as at Q1 2015.

TR: The number of lines for alternative network operators includes the number of wholesale line rental and VOIP subscribers.

Annex 6 Average MTR per operator as of 1 July 2015

Table 6

Country	Operator	Average effective prices (€cent)	Subscribers	Country total subscribers	Market Share %
	A1Telekom Austria	0.8049	5,400,150		41.74%
AT	T-Mobile Austria	0.8049	3,936,800	12,937,050	30.43%
	Hutchison Drei Austria	0.8049	3,600,100		27.83%
	Proximus	1.1800	confidential		confidential
BE	Mobistar	1.1800	confidential	10,111,457	confidential
	Base	1.1800	confidential		confidential
	Mobiltel	0.9715	confidential		39.78%
BG	Telenor Bulgaria	0.9715	confidential	confidential	35.96%
	BTC	0.9715	confidential		24.27%
	Swisscom	6.0038	6,751,000		59.41%
СН	Sunrise	7.4448	2,432,582	11,150,050	22.39%
	Salt	7.4448	1,966,468		18.20%
	Cyta	1.7100	739,398		65.59%
CY	Primetel	2.9100	41,457	1,127,305	3.68%
	MTN	1.7100	340,000		30.16%
	T-Mobile Czech Republic a.s.	0.9862	confidential	confidential	39.08%
CZ	O2 Czech Republic a.s.	0.9862	confidential		32.48%
	Vodafone Czech Republic a.s.	0.9862	confidential		22.24%
	T-Mobile	1.7200	39,465,000		35.11%
DE	Vodafone	1.7200	30,315,000	112,397,000	26.97%
	E-plus Mobilfunk / Telefónica Germany	1.7200	42,617,000	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	37.92%
	TDC	0.8066	3,121,702		37.78%
DK	Telia	0.8066	1,952,962	9 262 139	23.63%
DK	Telenor	0.8066	1,442,104	8,263,138	17.45%
	Hi3G	0.8066	1,090,088		13.19%
EE	Eesti Telekom	1.0000	735,461		38.96%
	Elisa	1.0000	642,100	1,887,849	34.01%
	Tele2	1.0000	510,288		27.03%
	Cosmote	1.1030	6,965,266	45 500 700	44.65%
EL	Vodafone	1.1030	4,748,008	15,599,760	30.44%
	Wind	1.1030	3,874,481		24.84%
	TME	1.0900	16,060,259		31.64%
ES	Vodafone	1.0900	11,546,440	50,760,771	22.75%
E3	Orange	1.0900	11,430,000		22.52%
	Xfera	1.0900	3,402,372		6.70%
FI	DNA	1.8700	n.a.	9,420,000	24.0%
	Elisa	1.8700	n.a.		40.0%

	TeliaSonera	1.8700	n.a.		35.0%
	Orange	0.7800	confidential		confidential
	SFR	0.7800	confidential		confidential
FR	Bouygues Telecom	0.7800	confidential	77,593,000	confidential
	Free Mobile	0.7800	confidential		confidential
	HT	0.8318	2,079,602		46.68%
HR	VIPnet	0.8318	1,573,408	4,454,917	35.32%
	Tele2	0.8318	801,907		18.00%
	T-Mobile	0.5586	5,346,509		46.33%
HU	Telenor	0.5586	3,580,880	11,540,058	31.03%
	Vodafone	0.5586	2,612,669		22.64%
	Vodafone Ireland	2.6000	1,877,435		38.5%
	Limited				
	Three Ireland	2.6000	1,542,788		31.7%
	Hutchison Limited				
	(formerly Hutchison 3G Ireland Limited)				
	Three Ireland Services	2.6000			
	(Hutchison) Limited			4 974 062	
IE	(formerly Telefonica			4,874,062	
	Ireland Limited) Meteor Mobile	2.6000	1,006,159		20.6%
	Communications	2.0000	1,000,100		20.070
	Limited				
	Tesco Mobile Ireland	2.6000	311,932		6.4%
	Limited Lycamobile Ireland	2.6000	119,382		2.4%
	Limited	2.0000	113,302		2.470
	Siminn	1.0297	130,252		35.20%
IS	Vodafone	1.0297	100,115	370,037	27.06%
10	Nova	1.0297	123,708	370,037	33.43%
	365/Tal	1.0297	12,911		3.49%
	Telecom Italia S.p.A.	0.9800	25,324,946		27.2%
	Vodafone Omnitel N.V.	0.9800	25,506,683		27.4%
IT	Wind Telecomunicazioni	0.9800	21,607,000	93,200,000	23.2%
	S.p.A.				
	H3G S.p.A.	0.9800	10,040,000		10.8%
	Salt (Liechtenstein)		confidential		confidential
	AG				
LI	Swisscom (Schweiz)	7.1486	confidential	11,868	confidential
	AG	7.1400		11,000	
	Telecom Liechtenstein		confidential		confidential
	AG			r	
	Tele2	1.0400	1,797,605	4 470 400	43.08%
LT	Omnitel	1.0400	1,291,094	4,173,103	30.94%
	Bite Lietuva	1.0400	1,006,824		24.13%
	EPT	0.9700	452,100	883,100	51.19%
LU	Tango	0.9700	285,600		32.34%
	Orange	0.9700	125,500	0.540.515	14.21%
LV	Tele2	1.0500	925,495	2,549,316	36.30%

	Latvijas Mobilais	1.0500	920,118		36.09%
	Telefons				
	Bite Latvija	1.0500	477,554		18.73%
	Zetcom	1.0500	151,964		5.96%
	Telenor	1.9000	383,930	1,009,087	38.05%
ME	Crnogorski Telekom	1.9000	341,645		33.86%
	Mtel	1.9000	283,512		28.10%
	T Mobile Macedonia	1.4636	1,006,470		47.23%
EVDOM	ONE	1.4636	536,533	2,131,027	25.18%
FYROM	Telecommunication services			2,131,027	
	VIP Macedonia	1.4636	588,024		27.59%
	Go plc	0.4045	220,401		39.75%
	Melita plc	0.4045	81,733		14.74%
MT	Vodafone	0.4045	242,362	554,468	43.71%
	Redtouch fone	0.4045	9,902	1	1.79%
	KPN	1.8610	6,419,000		31.72%
NL	T-Mobile	1.8610	5,022,000	20,234,000	24.82%
INL	Vodafone	1.8610	3,900,000		19.27%
	Telenor	0.9692	2,964,238		50.13%
	TeliaSonera	0.9692	2,416,596		40.87%
NO	Ventelo	0.9692	184,244	5,913,406	3.12%
	Lyca	0.9692	145,024		2.45%
	Orange Polska S.A.	1.0493	confidential		confidential
	Polkomtel sp. z o.o.	1.0493	confidential	56,905,306	confidential
PL	P4 sp. z o.o.	1.0493	confidential		confidential
	T-Mobile Polska S.A.	1.0493	confidential		confidential
	MEO	1.2700	confidential	16,419,185	47,99%
PT	VODAFONE	1.2700	confidential		31,69%
	NOS	1.2700	confidential		20,31%
	Vodafone Romania	0.9600	confidential		confidential
	S.A.	0.000	<i>C. J. C. J.</i>		6.1.4.1
RO	Orange Romania S.A.	0.9600	confidential	22,686,641	confidential
	TELEKOM RMC S.A.	0.9600	confidential		confidential
	RCS & RDS S.A.	0.9600	confidential		confidential
RS	MTS (Telekom Srbija)	2.8483	4,163,584	9,344,977	44.56%
	Telenor	2.8483	3,109,446	9,544,977	33.27%
	Vip mobile	2.8483	2,071,947		22.17%
SE	TeliaSonera	0.814	5,397,600	-	37.16%
	Tele2	0.814	3,981,900	14 525 000	27.41%
	Telenor Hi3G	0.814 0.814	2,509,600 1,799,400	14,525,000	17.28% 12.39%
	Lycamobile	0.814	5,397,600	-	2.15%
	Telekom Slovenije	1.1400	confidential	<u> </u>	53.74%
	Si.mobil	1.1400	comidential	1	JJ.14/0
SI			confidential	confidential	29.62%
	Telemach Mobil	1.1400	confidential		

					13.58%
	T-2	1.1400	confidential		
			Cormuential		3.05%
	Orange Slovensko	1.2260	confidential		41,03%
SK	Slovak Telekom	1.2260	confidential	confidential	30,60%
	O2 Slovakia	1.2260	confidential		28,37%
	Turkcell	0.8346	34,260,000		47.56%
TR	Vodafone	0.8613	21,140,000	72,040,000	29.34%
	Avea	0.9882	16,640,000		23.10%
	EE	0.9431	confidential		confidential
UK	O2	0.9431	confidential	84,589,978	confidential
	Vodafone	0.9431	confidential	04,009,976	confidential
	H3G	0.9431	confidential		confidential

Notes to Table 6

BE: Subscribers = number of active simcards as of the 1st of January 2015, MVNO excluded

BG: Data based on number of mobile voice subscribers (excl. data SIMs and M2M) as of 01.07.2015

CH: Subscriber base as of 30.06.2015

CZ: CTU regulates MTR without differentiation between "peak" and "off peak" time. Termination for MVNO is carried out by their MNOs for regulated rates. Also total number of SIM cards are provided as of 1st January 2015 - data for the 1st half of the year 2015 are not yet available.

DK: All data comes from the first half of 2014. Two operators in "rest of operators" is MVNO, the operators is: Lycamobile and Mundio Mobile - these operators also have a MTR of 6.02 (price in 1/100 of national currency). The rest of the companies is not subject to an MTR (including DLG Tele and Siminn).

DE: Current MTR are valid from 01.12.2014 until 30.11.2015. They are preliminary and still subject to phase II investigation.

Number of subscribers are as of 2th quarter 2015. After the merger of Telefónica and E-Plus joint subscriber numbers are reported from 4th quarter 2014.

EL: Data refers to registered subscriptions as at 31.12.2014

HU: New data are not available. Data as July 2014

IS: Subscriber data for 1.7.2015 not available, using data for end of 2014. MTR price for 2015

IT: Individual Subscriber numbers as of December 2014.

LT: LT belongs to euro zone from 01/012015. MTR was changed to 1.04 euro ct/min. Subscribers at 2015 1st Q

LU: Price cap based on Pure-LRIC. Regulation Decision 15/191/ILR of 20th of March on MTRs /M7-2007.Règlement 15/191/ILR du 20 mars 2015 portant fixation du plafond tarifaire pour les prestations de la terminaison d'appel vocal sur les réseaux mobiles individuels (Marché 7/2007),

FYROM: Data for the first quarter of 2015

MT: Data reflects position as at end Q1 2015

NL: Subscribers 1st January 2015

NO: Numbers of subscribers are provided as 31.12.2014. The total number of subscribers according to 1st of July 2015 will not be able before Q3 2015.

In February 2015 The Competition Authority approved the acquisition of Tele2 by TeliaSonera. The acquisition included subscribers from both Network Norway and Tele2. Subscribers from TeliaSonera, Network Norway and Tele2 are therefore merged in the figures.

A third MNO, ICE, has entered the market, but offers mobile subscription based on service provider agreement from July 2015.

PL, RS, SE: Subscribers as of 31.12.2014.

TR: Number of subscribers is filled according to the first guarter of 2015

Annex 7 Average wholesale termination revenues per country (euro cent)

Notes to figure 16

BE: Limited to national terminating traffic

BG: Calculated based on revenues from traffic originated from national fixed networks and terminated in mobile networks during 2014 and the relevant traffic. Excluded are fixed-to-mobile calls when both the fixed and the mobile network are owned and run by the same operator.

CH, HR: The data refers to the whole year 2014.

DK: There is no setup fee, thereby the average revenue per min is 6.68 (1/100 of national currency). There is no data for the total MTR revenue in Denmark

This revenue and minutes include only fixed-to-mobile calls, as indicated in the past (i.e. as we have done it in the previous years). Please note that MTRs for the year 2014 were not based on pure BU-LRIC model and therefore were higher than set for the year 2015 (see HAKOM's data submitted in previous reports).

HU: Data of 2014 are not yet available.

LT: Data provided is for the whole 2014. Lithuanian national currency is Euro from 01/01/2015, but because data provided for 2014, revenues is still in old national currency Litas (1 Euro = 3.4528 Litas)

LU: Data provided is for 2014 and includes all national and international calls to mobile, except mobile to mobile own network.

ME: Data are for calls originated from national operators and from abroad. MTR for calls that are originated from abroad are not regulated. MTR are changed from 01. November 2014 for national calls (fixed and mobile)

FYROM: Mobile to mobile and fixed to mobile revenue included. For fixed to mobile calls only the values are: 553,369 € and 30,837,455 min.

NO: The termination rate has been 16 øre (national currency = 1.86 Eurocent) in 2014 and until 30.06.2015

RO: MTRs changed in April 2014.

RS: Data provided is for 2014 and includes only national fixed-to-mobile calls. Revenue and traffic do not include fixed-to-mobile calls when both the fixed and the mobile network are owned and run by the same operator.

SI: Including international termination. Self-supply is not included!

MTR revenues and minutes include also traffic terminated on premium numbers, numbers for tele voting, mass calling, and short numbers.

TR: Total MTR minutes includes only calls that originates and terminates within Turkey. In the table above total MTR revenues and total MTR minutes include data of the whole 2014.

Annex 8 Regulatory model implemented to calculate MTRs

Table 7

	cos	T ACCOUNTING	G MODEL		GLIDE PATH in €cent				
Jan-15	Model	Rate status	When a tariff adopted by a final decision and meeting the standards of the TR Recommendation has been or will be firstly applied?	Period 1 - From 01/07/2015 until 31/12/2015	Period 2 - From 01/01/2016 until 30/06/2016	Period 3 - From 01/07/2016 until 31/12/2016	Period 4 - From 01/01/2017 until 30/06/2017	Period 5 - From 01/07/2017 until 31/12/2017	
AT	BU-LRIC	adopted		0.8049					
BE	BU-LRIC	adopted		1.1800					
BG	Pure BU LRIC	adopted	01/07/2013	0.9715					
СН									
CY	Top Down LRIC	adopted							
CZ	pure BU-LRIC	adopted	01/07/2013						
DE	BU-LRAIC+	notified		1.7200	1.6600				
DK	BU-LRIC	adopted		0.8066	0.7262				
EE	Benchmark	adopted	25/03/2014	1.0000					
EL	BU LRIC	adopted	01/01/2013	1.1030					

ES	BU LRIC		01/07/2013	1.09	1.09	1.09	1.09	1.0900
FI	other	adopted		1,87 and 1,25	1.2500	1.2500	1.2500	1.2500
FR	BU LRIC	adopted	01/01/2013	0.7800	0.76	0.7600	0.7400	0.7400
HR	Pure BU LRIC	adopted		0.8320				
HU	BU-LRIC	adopted	01.04.2015	0.5586	0.5586	0.5586		
IE	other			2.6000				
IS	Benchmark	adopted		1.0297	0.9484			
IT	BU-LRIC	notified	01/07/2013	0.9800	0.9800	0.9800	0.9800	0.9800
LT	Benchmarking BU- LRIC	adopted	01/08/2014	1.0400				
LI	Benchmarking	adopted		7.3487				
LU	Pure BU-LRIC	adopted	01/04/2015	0.9700	0.9700	0.9700		
LV	Benchmark BU-LRIC	adopted	01/07/2014	1.0500	1.0500			
ME	HCA FDC	adopted		1.9000				
FYROM	BU LRAIC+							
МТ	Pure BU-LRIC	adopted		0.4045	0.4045			
NL	BULRAIC+			1.0190				

NO	BU-LRIC	adopted	01/07/2015	0.9692	0.8758	0.8758	0.7590	0.7590
PL	Pure BU LRIC	adopted	01/07/2013	1.0493	1.0493	1.0493	1.0493	1.0493
PT	BU LRIC	adopted	31/12/2012	0.8300	0.8300			
RO	Pure BU LRIC	adopted	01/04/2014	0.9600				
RS	Benchmarking			2.8483				
SE	BU LRIC	adopted	01/07/2014	0.8140	0.8140			
SI	Pure BU LRIC	adopted	01/09/2014	1.1400	1.1400	1.1400	1.1400	1.1400
SK	Pure BU LRIC	adopted	01/08/2013	1.2260				
TR	BU LRAIC+							
UK	BU LRIC	adopted	01/04/2013	0.9431	0.8273	0.7115	0.7073	0.7031

Notes to Table 7:

BG: With Decision 135 from 14 February 2013 CRC approved cost-oriented mobile termination rates based on Pure Bu-LRIC model as follows:

from 01/07/2013 - 0.023 BGN/minute

from 01/01/2014 - 0.020 BGN/minute

from 01/01/2015 - 0.019 BGN/minute

No MTRs peak/off-peak differentiation

At the moment the CRC is in process of updating the BULRIC model and intends to notify it in 2016.

CH: MTRs are not regulated / there is no glide path.

CY: Please note that a new Notification procedure has been completed and new Decisions are to be soon issued. In the Decisions to be adopted, all mobile operators (MVNO and MNOs) are regulated and the rate imposed is based on the E.U. Benchmarking BU LRIC. This regulation will be in force until end of 2015.

CZ: CTU does not apply any glide path mechanism for time period 01/07/2015 - 30/12/2017. According to last price regulation level of MTR has been set up on 0.27 CZK per minute for all SMP-operators on relevant market no. 7. CTU currently doesn't assume any changes for time period 01/07/2015 - 30/12/2017. Regulated MTR has been calculated in accordance with Recommendation 2009/369/ES. Market shares of all operators correspond to date as of 1st January 2015.

DE: No glide path regulation. Current MTR (as indicated in Period 1) are valid from 01.12.2014 until 30.11.2015. Adjustments in the model lead to MTR as indicated in in period 2, which are valid from 01.12.2015. The decision is preliminary and still subject to phase II investigation.

ES: The final decision and meeting the standards of the TR Recommendation has been applied on 10th May 2012 but the MTR of the BULRIC model came into force on 1/7/2013. The methodology used by CNMC includes wholesale commercial costs directly related to the provision of the wholesale termination service to third parties.

FI: FICORA issued new decisions concerning significant market power in the mobile voice call termination markets on 10 August 2015. FICORA has, for the first time, set a cost-oriented maximum price for MTRs. The MTR 1.25 will come into effect on 1th of December 2015. The cost-oriented maximum price for MTRs has been calculated based on FDC approach.

HR: Decision on MTR's was issued in June 2013 when HAKOM was not obliged to notify the final decision to the EC as Croatia was not the EU member. MTR's have been based on pure BU-LRIC model since January 1, 2015. In 2015, cost model has to be updated meaning that the decision on new prices will be notified to the Commission. MNOs are obliged to provide HAKOM with the necessary information to update the cost model and complete data is expected to be received by the end of September 2015. After receiving the data, model will be updated and new MTRs for the period covered by this market analysis will be calculated. HAKOM will then conduct public consultation on draft decision regarding new MTR's and notify the decision to the EC. Taking into account the whole procedure, HAKOM plans to notify abovementioned decision in January or February 2016. Please note that MTRs are regulated only for the calls originated on Anumbers belonging to the EU/EEA operators and terminated into the individual mobile networks in Croatia

IE: • Please note that in December 2012 Vodafone issued appeal proceedings with respect to ComReg's MTR decision (http://www.comreg.ie/_fileupload/publications/ComReg12125.pdf (ComReg Document 12/125)).

- The appeal was heard in the high Court in May 2013. On 17 August the Order of the High Court included a provision for a maximum weighted average MTR of 2.60 cent per minute until the final determination of the Appeal or further order.
- On 21 November 2013, the High Court refused to grant any stay on its Order of 17 October 2013. The High Court also provided a further statement of reasons for its decision to postpone any ruling on Vodafone's challenge to the validity of ComReg's choice of pure LRIC as the relevant cost standard for regulating MTRs. In addition, the High Court clarified that the maximum rate of 2.60 cent per minute referred to in its Order of 17 October 2013 applies from 1 July 2013.

a. Judgment of the Irish High Court dated 14 August 2013

http://www.courts.ie/judgments.nsf/6681dee4565ecf2c80256e7e0052005b/005d4340da18896480257bc7003cd090?OpenDocument&Highlight=0,vodafone

- b. ComReg Information Notice 13/80: http://www.comreg.ie/_fileupload/publications/ComReg1380.pdf
- c. ComReg Information Notice 13/97: http://www.comreg.ie/_fileupload/publications/ComReg1397.pdf
- d. ComReg Information Notice 13/97a:

http://www.comreg.ie/_fileupload/publications/ComRegHCO1397a1.pdf

Please also note that the High Court judgment is currently under appeal to the Supreme Court and note that the High Court refused to grant any stay on its Order of 17 October 2013 (i.e. refused to grant any stay on the application of the 2.60 cent MTR) pending the outcome of the Supreme Court appeal. In this regard, please refer to:

e. ComReg Information Notice 13/99 http://www.comreg.ie/_fileupload/publications/ComReg1399.pdf
f. ComReg Information Notice 13/108 http://www.comreg.ie/_fileupload/publications/ComReg13108.pdf
f. Benchmark for 2016 currently under National Consultation. Benchmark for 2017 will be calculated mid 2016

LT: There was a rate calculated and based on Benchmarking methodology in 2014. Currently RRT starts new mobile termination market research, Benchmarking methodology potentially will be used again, and rate will be recalculated.

PT: By a decision approved in April 30, 2012, ANACOM set a glide-path for the evolution of the MTR in Portugal. The MTR that was set was in full accordance with the EC Recommendation, as it was based on a pure LRIC model. The glide-path reached the pure LRIC value by 31 December 2012, with an MTR of 1.27 eurocents per minute.

A new decision regarding market analysis on the mobile termination markets has been approved in 06.08.2015. The price control obligation defined new MTR (applied in accordance with EC Recommendation on Termination rates - BU-LRIC) of 0.83 eurocents per minute until 30.06.2016. From 0.1.07.2016 and from 01.07.2017 the MTR corresponds to the results of the model for those years adapted in accordance with the inflation rate.

RS: Price of 3.43 RSD is effective from 01/01/2015, until new RATEL's decision.

SK: RU has not applied any glide path.

TR: The MTR values effective from the date 01.07.2013 are close to the values calculated in cost model for the mobile operator of highest market share. For the other two mobile operators a constant asymmetric regulation ratio is applied with respect to the operator having highest market share. Moreover, ICTA does not regulate MTRs via glide path, in general MTRs are revised annually.

UK: Note that Ofcom uses financial year (APR to APR) glide paths for MTRs. Where the above periods cross an Ofcom glide path period, we have taken the average for the above period.

Annex 9 SMS TR per operator as of 1 July 2015

Table 8

	SMS TI		SMS TR (€cent) Subscribers		ibers	Maylest above	
Country	Operator	per operator	WA per country	per operator	Total per country	Market share	
	A1Telekom Austria	n.a.		5,400,150		41.74%	
AT	T-Mobile Austria	n.a.	3.11	3,936,800	12,937,050	30.43%	
	Hutchison Drei Austria	n.a.		3,600,100		27.83%	
	Proximus	4.96		confidential		confidential	
BE	Mobistar	4.96	4.96	confidential	10,111,457	confidential	
	Base	4.96]	confidential		confidential	
	Mobiltel	confidential		confidential		39.78%	
BG	Telenor Bulgaria	confidential	confidential	confidential	confidential	35.96%	
	BTC	confidential		confidential		24.27%	
	Swisscom	confidential		6,751,000		59.41%	
CH	Sunrise	confidential	4.8956	2,432,582	11,150,050	22.39%	
	Salt	confidential]	1,966,468		18.20%	
	Cyta	0.5500		739,398		65.59%	
CY	Primetel	0.7300	0.6023	41,457	1,127,305	3.68%	
	MTN	0.6800		340,000		30.16%	
	T-Mobile Czech Republic a.s.	confidential		confidential		39.08%	
CZ	O2 Czech Republic a.s.	confidential	confidential	confidential	confidential	32.48%	
	Vodafone Czech Republic a.s.	confidential]	confidential		22.24%	
	T-Mobile	n.a.		39,465,000		35.11%	
DE	Vodafone	n.a.	n.a.	30,315,000	112,397,000	26.97%	
DE	E-plus Mobilfunk / Telefónica	n.a.	11.4.	42,617,000	112,387,000	37.92%	
	Germany						
DK	TDC	0.1487	0.1487	3,121,702		37.78%	

	Telia	0.1487		1,952,962		23.63%
	Telenor	0.1487]	1,442,104	8,263,138	17.45%
	Hi3G	0.1487]	1,090,088	1 [13.19%
	Eesti Telekom	2.6000		735,461		38.96%
EE	Elisa	2.1000	2.2948	642,100	1,887,849	34.01%
	Tele2	2.1000		510,288	1	27.03%
	Cosmote	3.0000		6,965,266		44.65%
EL	Vodafone	3.0000	3.0000	4,748,008	15,599,760	30.44%
	Wind	3.0000		3,874,481	1 [24.84%
	TME	2.7000		16,060,259		31.64%
ES	Vodafone	2.4000	2.7261	11,546,440	50,760,771	22.75%
ES	Orange	3.1000		11,430,000	1 [22.52%
	Xfera	2.7000		3,402,372	1 [6.70%
	DNA			N.A.	0.400.000	24.0%
FI	Elisa	confidential	confidential	N.A.	9,420,000	40.0%
	TeliaSonera			N.A.		35.0%
	Orange	1.0000		confidential		confidential
FR	SFR	1.0000	1.0000	confidential	77,593,000	confidential
110	Bouygues Telecom	1.0000	1.0000	confidential	77,393,000	confidential
	Free Mobile	1.0000		confidential		confidential
	HT	n.a		2,079,602		46.68%
HR	VIPnet	n.a.	n.a.	1,573,408	4,454,917	35.32%
	Tele2	n.a.		801,907		18.00%
	T-Mobile	4.5737		5,346,509		46.33%
HU	Telenor	4.5737	4.5737	3,580,880	11,540,058	31.03%
	Vodafone	4.5737		2,612,669		22.64%
	Vodafone Ireland Limited	3.17		1,877,435		38.5%
ΙE	Three Ireland Hutchison Limited (formerly Hutchison 3G Ireland Limited)	3.17	3.17	1,542,788		31.7%

	Three Ireland Services (Hutchison) Limited (formerly Telefonica Ireland Limited)	3.17		1,029,010		21.0%
	Meteor Mobile Communications Limited	3.17		1,006,159	4,874,062	20.6%
	Tesco Mobile Ireland Limited			311,932] [6.4%
	Lycamobile Ireland Limited	3.17		119,382] [2.4%
	Siminn	2.5032		132,556		36.32%
IS	Vodafone	2.5032	2.5032	96,578	365,010	26.46%
15	Nova	2.5032	2.5032	119,453	365,010	32.73%
	365/Tal	2.5032		13,686		3.75%
	Telecom Italia S.p.A.	confidential		25,324,946		27.2%
	Vodafone Omnitel N.V.	confidential		25,506,683	1	27.4%
IT	Wind Telecomunicazioni S.p.A.	confidential	3.2781	21,607,000	93,200,000	23.2%
	H3G S.p.A.	confidential		10,040,000	1	10.8%
	Salt (Liechtenstein) AG	confidential		confidential		confidential
LI	Swisscom (Schweiz) AG	confidential	5.0709	confidential	11,868	confidential
	Telecom Liechtenstein AG	confidential		confidential	1 [confidential
	Tele2	0.7250		1,797,605		43.08%
LT	Omnitel	0.7250	0.8864	1,291,094	4,173,103	30.94%
	Bite Lietuva	1.4500		1,006,824] [24.13%
	EPT	n.a.		452,100		51.19%
LU	Tango	n.a.	n.a.	285,600	883,100	32.34%
	Orange	n.a.		125,500		14.21%
	Tele2	2.1300		925,495		36.30%
LV	Latvijas Mobilais Telefons	2.1300	2.1300	920,118	2,549,316	36.09%
	Bite Latvija	2.1300		477,554] [18.73%
ME	Telenor	2.200	2.200	383,930	1,009,087	38.05%
- IVIE	Crnogorski Telekom	2.200	2.200	341,645] [33.86%

	Mtel	2.200		283,512		28.10%
	T Mobile Macedonia	0.8131		1,006,470		47.23%
FYROM	ONE Telecommunication services	0.8131	0.8131	536,533	2,131,027	25.18%
	VIP Macedonia	0.8131		588,024		27.59%
	Go plc	1.8300		220,401		39.75%
MT	Melita plc	1.5600	1.7767	81,733	554,468	14.74%
	Vodafone	1.8000		242,362	1	43.71%
	KPN	5.6000		6,419,000		31.72%
NL	T-Mobile	5.6000	5.6000	5,022,000	20,234,000	24.82%
	Vodafone	5.6000		3,900,000	Ī	19.27%
	Telenor	4.0900		2,964,238		50.13%
NO	TeliaSonera	4.0900	4.0900	2,416,596	5 012 406	40.87%
NO	Ventelo	4.0900		184,244	5,913,406	3.12%
	Lyca	4.0900		145,024		2.45%
	Orange Polska S.A.	1.2200		confidential	56,905,306	confidential
PL	Polkomtel sp. z o.o.	1.2200	1.2200	confidential		confidential
''-	P4 sp. z o.o.	1.2200		confidential		confidential
	T-Mobile Polska S.A.	1.2200		confidential		confidential
	MEO	confidential		confidential		47,99%
PT	VODAFONE	confidential	1.2700	confidential	16,419,185	31,69%
	NOS	confidential		confidential		20,31%
	Vodafone Romania S.A.	2.6111		confidential		confidential
RO	Orange Romania S.A.	2.7142	2.6565	confidential		confidential
NO	TELEKOM RMC S.A.	2.6323	2.0303	confidential	22,686,641	confidential
	RCS & RDS S.A.	2.5642		confidential		confidential
	MTS (Telekom Srbija)	1.6600		4,163,584		44.56%
RS	Telenor	1.6600	1.6600	3,109,446	9,344,977	33.27%
	Vip mobile	1.6600		2,071,947	<u> </u>	22.17%
SE	TeliaSonera	3.2260	3.2260	5,397,600	14,525,000	37.16%
JL	Tele2	3.2260	3.2200	3,981,900	14,323,000	27.41%

	Telenor	3.2260		2,509,600		17.28%
	Hi3G	3.2260		1,799,400		12.39%
	Lycamobile	3.2260		5,397,600		2.15%
	Telekom Slovenije			confidential		53.74%
SI	Si.mobil	Bill & Keep	Bill & Keep	confidential	confidential	29.62%
31	Telemach Mobil	Dill & Reep	Dill & Neep	confidential	Cormaeriliai	13.58%
	T-2			confidential		3.05%
	Orange Slovensko	2.5000		confidential		41,03%
SK	Slovak Telekom	2.5000	2.500	confidential	confidential	30,60%
	O2 Slovakia	2.500		confidential		28,37%
	Turkcell	0.1436		34,260,000		47.56%
TR	Vodafone	0.1436	0.1466	21,140,000	72,040,000	29.34%
	Avea	0.1569		16,640,000		23.10%
	EE	confidential		confidential		confidential
UK	O2	confidential	2.681	confidential	84,589,978	confidential
O IX	Vodafone	confidential	2.001	confidential	04,309,970	confidential
	H3G	confidential		confidential		10.18%

Notes at Table 8:

AT: Due to lack of data the TR is calculated on the basis of average revenue per SMS from the year 2013.

BE: Subscribers = number of active simcards as of the 1st of January 2015, MVNO excluded

CZ: Market shares of all operators as of 1st January 2015.

DE: Number of subscribers are as of 2th quarter 2015. After the merger of Telefónica and E-Plus joint subscriber numbers are reported from 4th quarter 2014.

SMS call termination rates are not regulated in Germany.

DK: All mobile companies are covered by the same obligations on SMS Call Termination

All data from the first half of 2014.

EL: Data refers to registered subscriptions as at 31.12.2014

HU: New data are not available. Data as July 2014

SMS termination rate in national currency has not changed, only the HUF / Eur exchange rate has changed.

IT: Individual Subscriber numbers as of December 2014

LI: Salt (Liechtenstein) AG: "We do not charge MT-SMS and in all AA.19 contract the price is 0.0€ therefore we do not have a price list."

Telecom Liechtenstein AG: "SMS interworking fee is an average value and confidential"

LU: No data available as not regulated.

ME: SMS termination rates are valid only for termination of SMS's that originated from national operators

MT: Data reflects as at Q1 2015 (January - March 2015)

NL: The TR is the last known commercially agreed SMS-termination rate.

SE: PTS does not monitor the SMS wholesale termination rates. The current reference offers indicates a termination rate of SEK 0.30 (as reported above). However, statistics shows that the average retail revenue per sent SMS was SEK 0.16 in 2014, clearly indicating that a wholesale level of SEK 0.30 is too high OR that the revenue from SMS termination has a net value of close to zero in the market, e.g. an SMS sent is often met by a reply from the receiver.

SI: SMS termination rates are not regulated. Operators apply "bill and keep" system.

RS: The operators of mobile telephony in Serbia applied termination fee of 2 dinars per message for SMS traffic from 01.06.2015.

Annex 10 Abbreviations and Exchange rates

Table 9 – Abbreviations

Table 10 - Exchange Rates 12

AT	Austria
BE	Belgium
BG	Bulgaria
CH	Switzerland
CY	Cyprus
CZ	Czech Republic
DK	Denmark
DE	Germany
EE	Estonia
EL	Greece
ES	Spain
FI	Finland
FR	France
HR	Croatia
HU	Hungary
IE	Ireland
IS	Iceland
IT	Italy
LI	Liechtenstein
LT	Lithuania
LV	Latvia
LU	Luxembourg
ME	Montenegro
FYROM	the former Yugoslav Republic of Macedonia
MT	Malta
NL	Netherlands
NO	Norway
PL	Poland
PT	Portugal
RO	Romania
RS	Serbia
SE	Sweden
SI	Slovenia
SK	Slovakia
TR	Turkey
UK	United Kingdom
	U

COUNTRY	1 EURO
BG	1.96
CH	1.04
CZ	27.38
DK	7.46
HR	7.57
HUF	306.10
IS	147.62
LI	1.04
FYROM	61.50
NO	8.56
PL	4.09
RO	4.44
RS	120.42
SE	9.30
TR	3.00
UK	0.72

 $^{^{12}\,}$ ECB website: $\frac{\text{http://sdw.ecb.europa.eu/browseSelection.do?DATASET=0\&FREQ=A\&node=2018794}}{\text{For IS at }\frac{\text{http://www.cb.is/exchange-rate/}}{\text{http://www.cb.is/exchange-rate/}}}.$

Annex 11 Glossary

A(s)	Simple average
A(w)	Weighted average
FTR	Fixed Termination Rate
MTR	Mobile terminate rate
NRA	National Regulatory Authority
SMS	Short Message Service
TR	Termination Rate
TD	Top Down
BU	Bottom Up
LRIC	Long Run Incremental Cost
LRAIC	Long Run Average Incremental Cost
FAC	Fully Allocated Cost
CCA	Current Cost Accounting
HCA	Historical Cost Accounting
FDC	Fully Distributed Cost