

# Fixed and mobile termination rates in the EU January 2015

### **Table of contents**

1.	Introduction	2
2.	Interconnection in fixed networks	2
	2.1. Assumptions	2
	2.2. FTR benchmark: nominal rates	3
	2.3. Average revenue per minute (all operators) in 2014	12
	2.4. Regulatory model implemented as of 1 January 2014	14
	2.5. Number of lines and market shares	20
3.	Interconnection in mobile networks	26
3.8	a. Voice interconnection	26
	3.a.1 Assumptions made for the benchmarking	26
	3.a.2. Average MTR per country: nominal rates per voice minute (as of January 2015)	28
	3.a.3. Average MTR per operator: nominal rates	31
	3.a.4. Average wholesale termination revenues per country (euro cent)	37
	3.a.5. Regulatory model implemented and glide paths for MTRs	39
3.I	b. SMS interconnection	44
	3.b.1. Assumptions and benchmarking methodology	44
	3.b.2. SMS TR per operator	45
	3.b.3. SMS TR per country	50
4.	Annex	51

#### 1. Introduction

This document is an updated version of the benchmark of fixed, mobile and SMS termination rates across Europe prepared by the BEREC Benchmarking Expert Working Group in cooperation with the BEREC Termination Rates 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.

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

#### 2. Interconnection in fixed networks

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. Because of the call termination market structure, 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 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

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: nominal rates

In the next table the interconnection prices of operators listed by countries are presented. For each country, the NRA has provided information on the incumbent and some other 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.

Table 1

				Price per operator €cents	
Country	Operator	Layer	peak	Off-peak	Total
AT	Telekom Austria	Layer 1	0.137	0.085	0.111
	Other operators	Layer 1	0.137	0.085	0.111
		Layer 1	0.613333	0.323333	0.468333
	Belgacom	Layer 2	0.876667	0.456667	0.666667
BE		Layer 3	1.12	0.59	0.855
	Other energters	Layer 1	0.876667	0.456667	0.666667
	Other operators	Layer 2	1.12	0.59	0.855
	Bulgarian Telecommunication Company	Layer 1	0.26	0.26	0.2556
	Mobiltel	Layer 1	0.26	0.26	0.2556
BG	Cosmo Bulgaria Mobile	Layer 1	0.26	0.26	0.2556
	Blizoo Media and Broadband	Layer 1	0.26	0.26	0.2556
	Other operators	Layer 1	0.26	0.26	0.2556
СН	Swisscom	Layer 2	0.899388	0.467691	0.702283
C.I.	SWISSCOIII	Layer 3	0.699895	0.381901	0.571745
		Layer 1	N/A	N/A	0.342
	СҮТА	Layer 2	N/A	N/A	0.547
674		Layer 3	N/A	N/A	0.632
CY	PRIMETEL	Layer 2	N/A	N/A	0.632
	CABLENET	Layer 2	N/A	N/A	0.632
	MTN FIXED	Layer 2	N/A	N/A	0.632
	O2 Carab Damublia	Layer 1	N/A	N/A	0.1086
	O2 Czech Republic	Layer 2	N/A	N/A	0.1086
	GTS Czech	Layer 2	N/A	N/A	0.1086
CZ	UPC Česká republika	Layer 2	N/A	N/A	0.1086
	T-Mobile Czech Republic	Layer 2	N/A	N/A	0.1086
	České radiokomunikace	Layer 2	N/A	N/A	0.1086
	Other operators	Layer 2	N/A	N/A	0.1086

I		1			
DE	Telekom Deutschland GmbH	Layer 1	0.24	0.24	0.24
		Layer 1	0.054967	0.030835	0.051347
DK	TDC	Layer 2	0.054967	0.030835	0.051347
		Layer 3	0.55414	0.339634	0.521965
		Layer 1	0.883333	0.573333	0.759333
	Elion	Layer 2	1.04	0.67	0.892
EE	Starman	Layer 2	1.04	1.04	1.04
	Elisa	Layer 2	1.1	1.1	1.1
	STV	Layer2	0.833333	0.833333	0.833333
		Layer 1	N/A	N/A	0.0695
	OTE	Layer 2	N/A	N/A	0.0695
		Layer 1	N/A	N/A	0.0695
	Forthnet	Layer 2	N/A	N/A	0.0695
	1101	Layer 1	N/A	N/A	0.0695
EL	HOL	Layer 2	N/A	N/A	0.0695
	MANIAID	Layer 1	N/A	N/A	0.0695
	WIND	Layer 2	N/A	N/A	0.0695
	Other operators	Layer 1	N/A	N/A	0.0695
		Layer 2	N/A	N/A	0.0695
	TELEFÓNICA	Layer 1	0.0817	0.0817	0.0817
	ONO	Layer 1	0.728	0.728	0.728
Γ¢	VODAFONE	Layer 1	0.86	0.52	0.7206
ES	JAZZTEL	Layer 1	0.728	0.728	0.728
	ORANGE	Layer 1	0.728	0.728	0.728
	Other operators	Layer 1	0.728	0.728	0.728
	Elisa Oyj	N/A	N/A	N/A	2.8
	DNA Oyj	N/A	N/A	N/A	2.8
	TeliaSonera Finland Oyj	N/A	N/A	N/A	2.8
FI	Etelä-Satakunnan Puhelin	N/A	N/A	N/A	2.35
	Ålands Telefonandelslag	N/A	N/A	N/A	2.2
	Average	N/A	N/A	N/A	2.77
	Orange	Layer 1	N/A	N/A	0.079
FR	Other operators	Layer 1	N/A	N/A	0.079
		Layer 1	0.3501	0.1744	0.0645
	нт	Layer 1 Layer 2	0.5074	0.2531	0.0645
		Layer 2 Layer 3	0.9611	0.4812	0. 0645
HR	Optima Telekom	Layer 2	0.5074	0.2531	0.0653
	VIPnet	Layer 2	0.5074	0.2531	0.0638
		Layer 1	0.5074	0.2531	0.0705
	H1 Telekom	Layer 2	0.3501	0.1744	0.0705
	Other operators	,			0.0587
		Layer 1	0.1296	0.1296	0.1296
	Magyar Telekom	Layer 2	0.1296	0.1296	0.1296
		Layer 3	0.1296	0.1296	0.1296
HU		Layer 1	0.1296	0.1296	0.1296
	Invitel	Layer 2	0.1296	0.1296	0.1296
		Layer 3	0.1296	0.1296	0.1296
	UPC	Layer 1	0.1296	0.1296	0.1296
		,			

Layer 1		Other operators	Layer 1	0.1296	0.1296	0.1296
IE		Other operators				
Layer 3	IE	Fircom	,			
Siminn		2.1.00111	•			
IS		Siminn				
Telecom Italia S.p.A.   Layer 2   0.543985   0.543985   0.543985	IS					
Telecom Italia S.p.A.   Layer 2   0.075   0.			-			
Telecom Italia S.p.A.   Layer 1   0.075   0.075   0.075		Cuici operators				
Wind Telecomunicazioni   Layer 1   0.075   0.075   0.075     Fastweb S.p.A.   Layer 1   0.075   0.075   0.075     TeleTu S.p.A.   Layer 1   0.075   0.075   0.075     TeleTu S.p.A.   Layer 1   0.075   0.075   0.075     TeleTu S.p.A.   Layer 1   0.075   0.075   0.075     Ula		Telecom Italia S.p.A.				
Layer 1   Layer 1   Layer 1   0.075   0.075   0.075		Wind Telecomunicazioni				
LI         TeleTu S.p.A.         Layer 1         0.075         0.075         0.075           LI         Telecom Liechtenstein AG         Layer 2         4.1511         4.1511         4.1511           LI         TEO LT, AB         Layer 1         0.611098         0.611         0.611098           UAB "CSC Telecom"         Layer 1         0.611098         0.611         0.611098           AB "Lietuvos geležinkeliai"         Layer 1         0.611098         0.611         0.611098           UAB "Cgates"         Layer 1         0.733333         0.373333         0.553333           Layer 2         0.963333         0.483333         0.723333           Layer 1         0.1037         0.1037         0.1037           LV         Baltcom TV         Layer 1         0.1037         0.1037         0.1037           CSC Telecom         Layer 1         0.1037         0.1037         0.1037           CSC Telecom         Layer 2         0.94         0.94         0.94           ME         Crnogorski Telekom         Layer 1         0.74         0.74         0.74           Mtel         Layer 1         0.94         0.94         0.94	IT		Layer 1			
LI         Telecom Liechtenstein AG         Layer 2         4.1511         4.1511         4.1511           LT         TEO LT, AB         Layer 1         0.611098         0.611         0.611098           UAB "CSC Telecom"         Layer 1         0.611098         0.611         0.611098           AB "Lietuvos geležinkeliai"         Layer 1         0.611098         0.611         0.611098           UAB "Cgates"         Layer 1         0.733333         0.373333         0.553333           Layer 1         0.733333         0.483333         0.723333           Layer 2         0.963333         0.483333         0.723333           LV         Baltcom TV         Layer 1         0.1037         0.1037         0.1037           CSC Telecom         Layer 1         0.1037         0.1037         0.1037           Crnogorski Telekom         Layer 2         0.94         0.94         0.94           ME         Crnogorski Telekom         Layer 1         0.74         0.74         0.74           Mtel         Layer 1         0.94         0.94         0.94		Fastweb S.p.A.	Layer 1	0.075	0.075	0.075
TEO LT, AB Layer 1 0.611098 0.611 0.611098  UAB "CSC Telecom" Layer 1 0.611098 0.611 0.611098  AB "Lietuvos geležinkeliai" Layer 1 0.611098 0.611 0.611098  UAB "Cgates" Layer 1 0.611098 0.611 0.611098  Layer 1 0.733333 0.373333 0.5553333  Layer 2 0.963333 0.483333 0.723333  Layer 2 0.963333 0.483333 0.723333  Lattelecom Layer 1 0.1037 0.1037 0.1037  CSC Telecom Layer 1 0.1037 0.1037 0.1037  CSC Telecom Layer 1 0.1037 0.1037 0.1037  Crnogorski Telekom Layer 2 0.94 0.94 0.94  ME Crnogorski Telekom Layer 1 0.74 0.74 0.74  Mtel Layer 1 0.94 0.94 0.94		TeleTu S.p.A.	Layer 1	0.075	0.075	0.075
LT         UAB "CSC Telecom"         Layer 1         0.611098         0.611         0.611098           AB "Lietuvos geležinkeliai"         Layer 1         0.611098         0.611         0.611098           LU         EPT         Layer 1         0.733333         0.373333         0.553333           Layer 2         0.963333         0.483333         0.723333           Ly         Baltcom TV         Layer 1         0.1037         0.1037         0.1037           CSC Telecom         Layer 1         0.1037         0.1037         0.1037           CSC Telecom         Layer 1         0.1037         0.1037         0.1037           ME         Crnogorski Telekom         Layer 2         0.94         0.94         0.94           Mtel         Layer 1         0.74         0.74         0.74           Mtel         Layer 1         0.94         0.94         0.94	и	Telecom Liechtenstein AG	Layer 2	4.1511	4.1511	4.1511
LT AB "Lietuvos geležinkeliai" Layer 1 0.611098 0.611 0.611098  Layer 1 0.611098 0.611 0.611098  Layer 1 0.733333 0.373333 0.553333 Layer 2 0.963333 0.483333 0.723333  Lattelecom Layer 1 0.1037 0.1037 0.1037  CSC Telecom Layer 1 0.1037 0.1037 0.1037  CSC Telecom Layer 1 0.1037 0.1037 0.1037  Crnogorski Telekom Layer 2 0.94 0.94 0.94  ME Crnogorski Telekom Layer 1 0.74 0.74  Mtel Layer 1 0.94 0.94 0.94		TEO LT, AB	Layer 1	0.611098	0.611	0.611098
Layer 1		UAB "CSC Telecom"	Layer 1	0.611098	0.611	0.611098
LU         Layer 1         0.611098         0.611         0.611098           LU         EPT         Layer 1         0.733333         0.373333         0.553333           Layer 2         0.963333         0.483333         0.723333           LV         Baltcom TV         Layer 1         0.1037         0.1037         0.1037           CSC Telecom         Layer 1         0.1037         0.1037         0.1037           Crnogorski Telekom         Layer 1         0.94         0.94         0.94           ME         Crnogorski Telekom         Layer 1         0.74         0.74         0.74           Mtel         Layer 1         0.94         0.94         0.94	LT	AB "Lietuvos geležinkeliai"	Layer1	0.611098	0.611	0.611098
LU         EPT         Layer 2         0.963333         0.483333         0.723333           LV         Baltcom TV         Layer 1         0.1037         0.1037         0.1037           CSC Telecom         Layer 1         0.1037         0.1037         0.1037           Crnogorski Telekom         Layer 2         0.94         0.94         0.94           ME         Crnogorski Telekom         Layer 1         0.74         0.74         0.74           Mtel         Layer 1         0.94         0.94         0.94		UAB "Cgates"	Layer 1	0.611098	0.611	0.611098
Layer 2         0.963333         0.483333         0.723333           LV         Baltcom TV         Layer 1         0.1037         0.1037         0.1037           CSC Telecom         Layer 1         0.1037         0.1037         0.1037           Crnogorski Telekom         Layer 2         0.94         0.94         0.94           ME         Crnogorski Telekom         Layer 1         0.74         0.74         0.74           Mtel         Layer 1         0.94         0.94         0.94			Layer 1	0.733333	0.373333	0.553333
LV         Baltcom TV         Layer 1         0.1037         0.1037         0.1037           CSC Telecom         Layer 1         0.1037         0.1037         0.1037           Crnogorski Telekom         Layer 2         0.94         0.94         0.94           ME         Crnogorski Telekom         Layer 1         0.74         0.74         0.74           Mtel         Layer 1         0.94         0.94         0.94	LU	EPI	Layer 2	0.963333	0.483333	0.723333
CSC Telecom         Layer 1         0.1037         0.1037         0.1037           ME         Crnogorski Telekom         Layer 2         0.94         0.94         0.94           Mtel         Layer 1         0.74         0.74         0.74           Mtel         Layer 1         0.94         0.94         0.94		Lattelecom	Layer 1	0.1037	0.1037	0.1037
ME         Crnogorski Telekom         Layer 2         0.94         0.94           ME         Crnogorski Telekom         Layer 1         0.74         0.74         0.74           Mtel         Layer 1         0.94         0.94         0.94	LV	Baltcom TV	Layer 1	0.1037	0.1037	0.1037
ME         Crnogorski Telekom         Layer 1         0.74         0.74           Mtel         Layer 1         0.94         0.94         0.94		CSC Telecom	Layer 1	0.1037	0.1037	0.1037
ME         Crnogorski Telekom         Layer 1         0.74         0.74           Mtel         Layer 1         0.94         0.94         0.94		Crnogorski Telekom	Layer 2	0.94	0.94	0.94
Mtel Layer 1 0.94 0.94 <b>0.94</b>	ME		Layer 1	0.74	0.74	0.74
		Mtel	Layer 1	0.94	0.94	0.94
				0.004717	N/A	0.004717
Makedonski Telekom AD Layer 2 0.00488 N/A 0.00488		Makedonski Telekom AD				
Layer 3 0.005855 N/A <b>0.005855</b>						
MK ONE Telecom services Layer 3 0.005855 N/A <b>0.005855</b>	MK	ONE Telecom services				
Aicall Layer 3 0.005855 N/A <b>0.005855</b>		Aicall				0.005855
Blizoo Layer 3 0.005855 N/A <b>0.005855</b>		Blizoo	Layer 3	0.005855	N/A	0.005855
Other operators Layer 3 0.005855 N/A <b>0.005855</b>		Other operators	Layer 3	0.005855	N/A	0.005855
GO plc Layer 1 N/A N/A <b>0.0443</b>		GO plc		N/A		0.0443
Melita plc Layer 1 N/A N/A 0.0443						
Vodafone Laver 1 N/Δ N/Δ 0.0443			-			
Ozone Layer 1 N/A N/A 0.0443	IVII	Ozone				
Vanilla Layer 1 N/A N/A 0.0443		Vanilla				0.0443
SIS Layer 1 N/A N/A <b>0.0443</b>		SIS	Layer 1	N/A	N/A	0.0443
KPN Layer 2 N/A N/A <b>0.302</b>		KPN	Layer 2	N/A	N/A	0.302
Ziggo Layer 2 N/A N/A 0.302	All	Ziggo	Layer 2	N/A	N/A	0.302
NL UPC Layer 2 N/A N/A <b>0.302</b>	NL	UPC	Layer 2	N/A	N/A	0.302
Tele2 Layer 2 N/A N/A <b>0.302</b>		Tele2	Layer 2	N/A	N/A	0.302
NO Telenor Layer 1 0.29 0.29 <b>0.29</b>	NO	Telenor	Layer 1	0.29	0.29	0.29

	Ventelo	Layer 1	0.29	0.29	0.29
	Tele2	Layer 1	0.29	0.29	0.29
	Telio	Layer 1	0.29	0.29	0.29
		Layer 1	0.65	0.32619	0.488095
	Orange Polska S.A.	Layer 2	0.77381	0.385714	0.579762
	0.000	Layer 3	1.138095	0.569048	0.853571
PL	NETIA	Layer 1	0.77381	0.385714	0.65
	Multimedia PK S.A.	Layer 1	0.65	0.65	0.65
	Multimedia PK - Południe S.A	Layer 1	0.65	0.65	0.65
	TK Telekom	Layer 1	0.65	0.65	0.65
		Layer 1	0.1026	0.1026	0.1026
	Meo Group	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
	Altice Group	Layer 1	0.1114	0.1114	0.1114
	TELEKOM RC S.A. (former	Layer 1	N/A	N/A	0.14
	Romtelecom)	Layer 2	N/A	N/A	0.14
RO		Layer 3	N/A	N/A	0.14
	RCS&RDS S.A.	Layer 1	N/A	N/A	0.14
	UPC Romania S.R.L.	Layer 1	N/A	N/A	0.14
	VODAFONE ROMANIA S.A.	Layer 1	N/A	N/A	0.14
		Layer 3	0.92	0.92	0.92
	Telekom Srbija	Layer 2	0.74	0.74	0.74
RS		Layer 1	0.52	0.52	0.52
113	Orion telekom	Layer 3	0.92	0.92	0.92
	Telenor	Layer 1	0.52	0.52	0.52
	SBB	Layer 1	0.52	0.52	0.52
	TeliaSonera	Layer 2	N/A	N/A	0.071184
SE	- Condomend	Layer 3	N/A	N/A	0.073837
	Other operators	Layer 2	N/A	N/A	0.071184
		Layer 3	N/A	N/A	0.073837
		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
	Telemach	Layer 1	0.0876	N/A	0.0876
	T-2	Layer 1	0.0876	N/A	0.0876
	Amis	Layer 1	0.0876	N/A	0.0876
	Slovak Telekom	Layer 1	0.1234	0.1234	0.1234
SK	Orange Slovensko, a.s.	Layer 2	0.1234	0.1234	0.1234
	Swan	Layer 1	0.1234	0.1234	0.1234
	UPC	Layer 1	0.1234	0.1234	0.1234
		Layer 1	0.5048	0.5048	0.5048
TR	Türk Telekom	Layer 2	0.621	0.621	0.621
		Layer 3	0.8135	0.8135	0.8135

	TTNet	Layer 3	1.1621	1.1621	1.1621
	Millenicom	Layer 3	1.1621	1.1621	1.1621
	Turknet	Layer 3	1.1621	1.1621	1.1621
	ВТ	Layer 1	0.057026	0.026612	0.044354
	TalkTalk	Layer 1	0.057026	0.026612	0.044354
UK	Virgin Media	Layer 1	0.057026	0.026612	0.044354
	Vodafone	Layer 1	0.057026	0.026612	0.044354
	Sky	Layer 1	0.057026	0.026612	0.044354

#### Notes to Table 1:

**BE**: Rates are based on the number of lines and distribution of traffic from 1 January 2013 (2014 data not yet available).

**BG:** There is no separation between peak/off-peak or interconnection levels for FTRs.

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

**CY:** There is no separation of rates between peak and off-peak. For CYTA the total number of line termination points are 276,059. 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, a 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).

The date 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 July 2014 – data for the whole of 2014 are not yet available.

**DE:** The number of lines is based on figures from 2013. Source: BNetzA Annual Report 2013

#### EL:

- 1) Since 1 January 2014 there is separation between peak and off-peak FTRs.
- 2) Since 28 May 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) .
- 3) Regarding the number of lines and market shares: the figures refer to active telephone access lines as of 30 June 2014. Data per operator (except from the incumbent) is considered confidential.
- 4) The information for the four operators shown in the table above also applies for other operators.
- **FI:** Figures come from the three biggest operators in terms of market share, together with two smaller operators with a different FTR.

#### FR:

The average FTR 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.

**IE:** ComReg Decision D12/12 set fixed termination rates at layer one (i.e. ericom's primary). ComReg Decision D12/12 imposed a 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:** Single Transit - FTR average calculated for a 3 minute call

LT: The network hierarchy includes only Layer 1 (National) from 1 April 2013.

**LU:** Entreprise des Postes et Télécommunications (EPT) FTR average is based on a traffic distribution assumption of 50% peak and 50% off-Peak. Coverage of Layer 1 is a mix of local and regional network hierarchy. Operators don't provide details on the distribution of traffic nor network layers. EPT has 2 IX layers, other operators generally have only one layer; all use set up fees and peak/off peak differentiation.

MT: The number of lines refers to the situation as of Q3 2014.

**NO:** The target prices are listed according to NPT's decisions in market 3 which came into effect on 1 January 2012. NPT does not measure distribution of traffic. Regarding termination on Layer 1, the majority of traffic is

exchanged at this levels, however some direct interconnection agreements exist between the smaller operators where traffic is exchanged on a national level (Layer 1 hierarchy and not Layer 2 like the network of the incumbent) but it is still termination on Layer 1. For practical purposes it is assumed that close to 100 %.

**PT:** Termination rates are charged on a per second basis. There is no separation of prices between peak and offpeak hours. The data concerning the number of lines refers to the situation on 31st December 2014. Altice Group includes Cabovisão and OniTelecom.

**RS:** Data provided are for 2013 (2014 data is not yet available) and include 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.

**SE:** There are no set-up fees nor any distinction between peak and off peak traffic. The number of lines are based on data as of June 30 2014.

**TK:** In Turkey, there is no separation between peak and off-peak. The number of lines for alternative network operators includes the number of wholesale line rental subscribers.

**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. All other CPs must set rates that are fair and reasonable, which are presumed to be symmetric to BT.

LI: There is no separation between peak and off-peak FTRs. The network of Telecom Liechtenstein AG has two layers, from a technical point of view. Currently Telecom Liechtenstein AG has only active interconnections on the hierarchical top layer, thus on the second closest possible interconnection level to the network termination point. Telecom Liechtenstein AG applies one flat, national termination rate.

#### 2.2.a. Interconnection rates (2015): incumbents

In this section the effective average per minute price of each layer of interconnection service provided by each incumbent operator is presented, together with an average for Europe (horizontal line).

#### Figure1

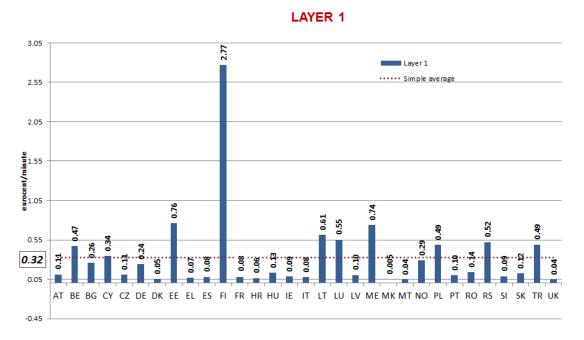


Figure 2

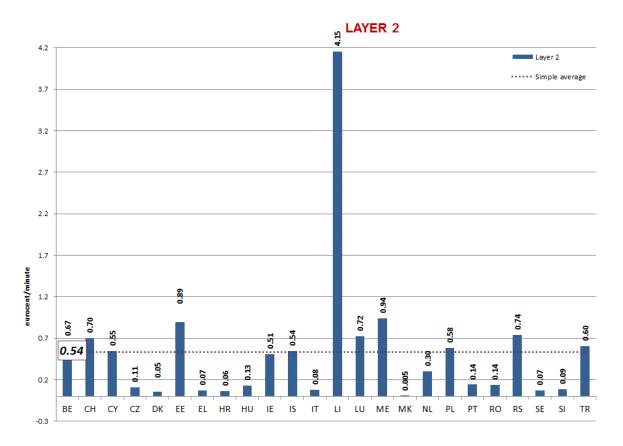
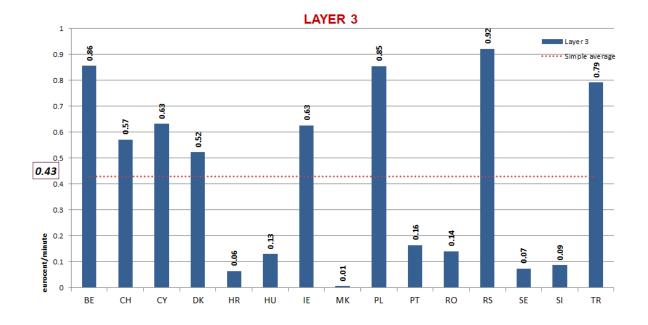


Figure 3



#### Short term evolution in Incumbent's fixed termination rates – (January 2014/January 2015)

Figure 4<sup>1</sup>

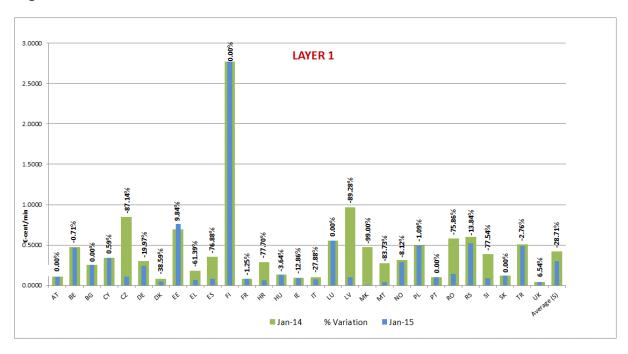
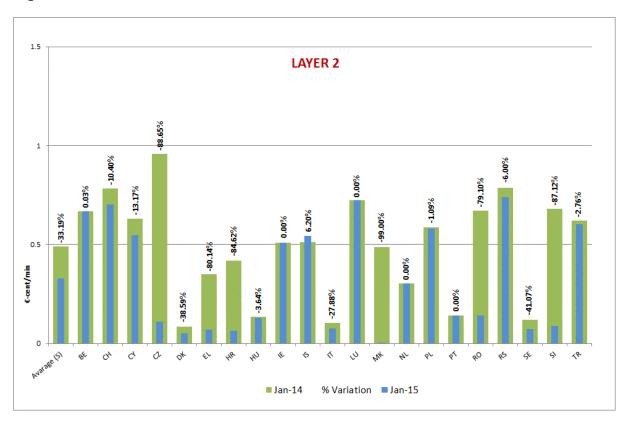
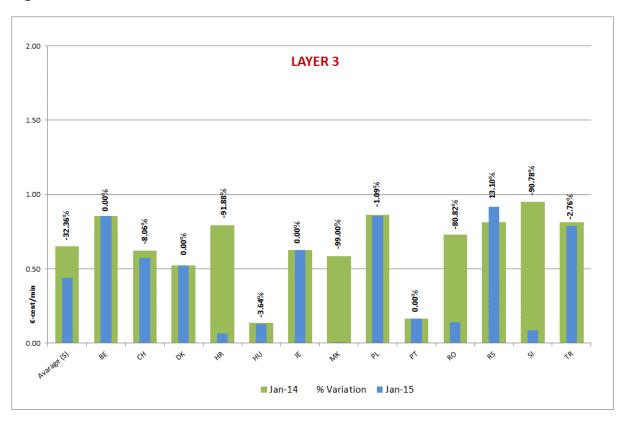


Figure 5



<sup>&</sup>lt;sup>1</sup> The rates and variation for Finland reflect the average across all operators, rather than the sample of operators that are named elsewhere in the report.

Figure 6



#### Glide path of the simple EU average of TRs for incumbent operators' fixed networks



Figure 7<sup>23</sup>

#### 2.3. Average revenue per minute (all operators) in 2014

In the next graph (figure 8) the average revenue per minute from interconnection services across all Layers and for all operators is reported, together with the simple average (horizontal line). 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.

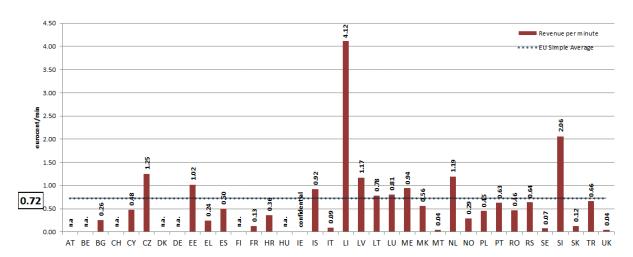
The comparison across countries of this average revenue has limitations, since each country may have a different distribution in usage across the different layers of interconnection and in the distribution between peak and off-peak traffic.

<sup>-</sup>

<sup>&</sup>lt;sup>2</sup> The average Layer 1 rate calculated for 2014 increased from 0.41 to 0.42 €cents due to retroactive changes regarding FTRs in some of the countries.

<sup>&</sup>lt;sup>3</sup> 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.

#### Figure 8



#### **Notes to Figure 8:**

AT: These data are no longer collected by RTR on a regular basis.

**BG:** The indicator is based on the traffic and revenue from national and international incoming calls terminated on fixed networks. Revenues and traffic terminated for non-geographic numbers on fixed networks are not included.

In 2014 the cost-oriented fixed terminating rates based on Pure Bu-LRIC model came into force – 0,005 BGN/minute. There is no separation between peak/off-peak or interconnection levels.

**CH:** The data are not collected.

**CZ**: The amount of total FTR revenue and minutes correspond to data as of 30 June 2014 (data as of 1 January 2015 are not yet available).

**EE:** Data is available only for the first half of 2014.

**EL:** The data are for the whole of 2014. The FTRs for the period 1/1/2014 - 27/5/2014 were defined by EETT with two 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 1 2015 onwards. The reported figures are from all operators in 2014Termination revenues and minutes at local, metropolitan and single & double transit interconnection cannot be split at this stage. CNMC has made an approximation with the weighting factors from 2013 for the values of the four quarters of 2014. The weighting factors in revenues are: local 72.62%; metropolitan (regional) 4.20%; national (single and double transit) 23.18%. The weighting factors in traffic are: local 65.08%; metropolitan (regional) 0.19%; national (single and double transit) 34.73%.

**HR:** Figures for Q4 2014 are not finalised yet because HAKOM is in the process of analysing the data but these are included in any case.

**IE:** The data relates to Eircom's traffic only. There is no separation for National, Regional or Local termination available. Please also note this information is confidential.

**IS:** Data are from the first half of 2014.

IT: Data are from 2014 (whole year). All data are estimates.

LI: Data are from January and February 2015.

LT: Data only from Q1-Q3.

LV: Data are from Q1 and Q2 2014. Data for Q3 and Q4 are not available yet. The FTR was changed on 1 July 2014

LU: Data are from Q1 and Q2 2014.

ME: Data are only for national traffic.

MK: Data only from Q1-Q3 2014.

MT: Data are from Janaury 2014 to September 2014

NL: Data are from Q1-Q3 2014

**NO:** There is insufficient data to provide accurate results. However, an estimate has been made based on the termination volume reported for the 1st half of 2014 and the termination rate on the incumbent's network in 2014. The total volume for 2014 is estimated by doubling the reported volume from the 1st half of 2014.

PT: Data are from 2013.

RO: Data are from H1 2014. FTRs were changed in April 2014.

**SE:** The latest full year data is for 2013, so the data provided here is a PTS estimate for 2014 based on the incumbent's traffic distribution between national and regional levels.

**SI:** National FTR revenues and minutes also include traffic for premium numbers terminated on the fixed network, numbers for tele-voting, mass calling and short dialling numbers.

**TK:** Data are from the fixed incumbent operator (Türk Telekom). Total FTR minutes includes only calls that originate and terminate within Turkey regardless of the origin of the call. In the table above total FTR revenues and total FTR minutes include data from the year 2014. FTRs for different Layers have been the same since 1 April 2010. Total FTR revenue and Total FTR minutes are confidential.

#### 2.4. Regulatory model implemented as of 1 January 2014

The next tables (2 and 3) provide a summary of the cost orientation model followed by each NRA.

Table 2

	COST AC	COUNTING MODEL	
Country	Model	BU LRIC rate (Target rate) €cent	when BU LRIC rate applied
AT	Pure BU LRIC	0.135/0.085	01/11/2013
BE TD			
BG	BG Pure BU LRIC		01/01/2015
CH BU LRAIC+			
СҮ	TD	0,632	
CZ	Pure BU LRIC	0.1086	Second half of May 2014
DE	BU LRAIC+		
DK	Pure BU LRIC		01/01/2013
EE	TD/Benchmark		
EL	Pure BU LRIC	0.0545	01/01/2017

ES	Pure BU LRIC	0,0817	01/11/2014
FI	FDC		
FR	Pure BU LRIC	0.0790	01/01/2013
HR			
ни	Pure BU LRIC	0.1296	01/01/2014
IE	Pure BU LRIC	0.0009	01/07/2014
IS	Other		
IT	Pure BU LRIC	0.0430	01/07/2015
u	TD		
LT	BU LRAIC+		potentially 01/07/2015
LU	Pure BU LRIC	0.1400	begin of 2015
LV	Benchmark	0.1000	01/07/2014
ME	Other		
МК	TD LRIC		
MT	Pure BU LRIC	0.0443	01/07/2013
NL	BU LRAIC+	0.1080	
NO	BU LRAIC+		
PL	BU LRAIC+		
PT	Benchmark		
RO	Pure BU LRIC	0.1400	01/04/2014
RS	TD-FAC-HC		
SE	Pure BU LRIC	0.12/0.07	01/01/2014
SI	Pure BU LRIC	0.0876	01/11/2014
SK	Pure BU LRIC	0.1234	01/09/2013
TR	BU LRIC+		
UK	Pure BU LRIC	0.0444	01/01/2014

#### Notes to table 2:

AT: The information is unchanged since the previous round.

**BG:** With Decision 134 from 14 February 2013 CRC approved cost-oriented fixed termination rates based on a Pure Bu-LRIC model as follows:

from 01.07.2013 - 0,005 BGN/minute

from 01.01.2014 - 0,005 BGN/minute

from 01.01.2015 - 0,005 BGN/minute

There is no separation 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 inAugust 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 has 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.

**FI:** FDC applied by operators.

**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 will be applied from 1 July 2015. The current rates are a weighted average between the IP rate determined by the model and a pure LRIC TDM rate. The weights are 33% IP and 67% TDM for the period between 1 July 2013 and 30 June 2014. AGCOM has estimated the number of lines.

LI: A benchmark is used as an efficiency check for TD-FDC calculated FTRs.

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 (market 3) 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:** There was a new decision made on 6 January 2014 (Règlement 14/170/ILR du 6 janvier 2014 M3/2007). Some operators consulted on new tariffs at the end of 2014. Symmetrical prices are not mandatory as the ILR has introduced a price control obligation in the form of price caps. [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]

LV: The benchmark is based on PURE BU LRIC countries only.

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

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

MT: The relevant publication is available at:

http://www.mca.org.mt/sites/default/files/attachments/decisions/2012/decision-on-bucm-2-ftr-2012.pdf

**NO:** We have updated our calculations of LRIC FTRs. A draft decision in markets 1, 2 and 3 is in national consultation and the industry had until 13 February to provide a response. Nkom expects to notify a decision in O2 2015.

**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.

**SE:** The regulation is based on the incumbent's different level of interconnection, i.e. regional and national interconnection. The rates in table 1.3 above reflects those levels. SEK 1,07 is the national interconnect/termination rate and SEK 0,66 is the regional interconnect/termination rate.

**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.

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 3

Country Symmetry		Comments
AT	YES	Symmetric pure LRIC charges apply since 1 November 2013.
BE	YES	The alternative operators' termination rates were set at the incumbent's national rate.
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).
СҮ	YES	The alternative operators' termination rate was set at the incumbent's (CYTA) national rate (0,632 euro cents).
cz	YES	
DK	YES	Price levels are symmetric. Regardless of the amount of interconnection point(s) and at which level (regional or local) the SMP operator provides access to the alternative operators, the FTRs are the same as the ones charged at a local level. This is to ensure that price levels are symmetrical, and that operators, regardless of topology and level of access, are able to terminate PSTN- and ISDN-traffic to prices at a local level.  With regard to (managed and unmanaged) VoIP-traffic, the SMP operator is not limited to give access at the location or interconnection point nearest the end-user,

		but has to provide access to all its interconnection points, since the terminating operator is able to choose a random point of interconnection where it wants to terminate VoIP-traffic to prices at a local level.
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 and established in market analysis. As the FTR is based on an efficient NGN-based operator, there is no longer the concept of level of interconnection, as there was in the past, because the architecture of NGN operators is not hierarchical. However, it was decided in the market analysis that, just for the case of termination in the incumbent's network, the interconnected operator should be connected at 21 Points of Interconnection (PoI), if TDM based interconnection is used. If the operator connects to less than these 21 PoI, then a transit for terminating at the other PoIs should be paid. For IP interconnection a decision on the number of PoI for termination in the incumbent operator's network is still pending. For the termination in alternative operators' networks, there is no remedy concerning the minimum number of PoI for FTRs — it is subject to commercial negotiation, as it was in the past.
FI		In Finland there are no price caps on FTRs. FTRs are symmetrical among most of fixed operators.
FR	YES	Symmetric termination rates apply since 1 October 2011.
HR	YES	Symmetry in fixed network is prescribed for all operators as of the 1 January 2013.
HU	YES	
IE	ComReg Decision D12/12 set fixed termination rates at layer one of primary). ComReg Decision D12/12 imposed symmetrical blended rate per minute for all SMP fixed operators from 1 July 2014. This blen reduce to 0.072 cent per minute from 1 July 2015. Please refer to ComReg Decision D12/12 http://www.comreg.ie/_fileupload/publications/ComReg12125.pdf	
IS	YES	
IT	YES	
LI	NO	There is only one fixed network operator in Liechtenstein: Telecom Liechtenstein AG. No symmetry considerations employed.
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, the level of interconnection and so on.
LU	YES	New relevant decision: Règlement 14/170/ILR du 6 janvier 2014 M3/2007. Some operators consulted on new tariffs at the end of 2014. Symmetric prices are not mandatory as the ILR has introduced a price control obligation in the form of price caps.
LV	YES	

ME	YES		
MK	YES		
MT	YES	Symmetry is ensured on the basis of geographical coverage from certain points of interconnection (e.g. regional termination is priced the same both ways regardless on actual network hierarchy). Symmetry is evaluated on the basis of average FTRs (i.e. pricing flexibility is left for operators).	
NL	YES	There is no differentiation in rates.	
NO	YES		
PL	YES	Partially, for FTR in T1 only.	
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	YES	Operators have different topologies and different numbers of the various levels of interconnection. Telekom Srbija and Orion telekom have 3 levels of interconnection. Telenor and SBB have 1 level of interconnection.	
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		
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.	

#### 2.5. Number of lines and market shares

In Table 4, 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.

Table 4

	Operator	Number of lines	Total number of lines	Market shares
	A1 Telekom Austria	2,199,696	3,266,500	67.30%
	Operator 2	468,206		14.30%
	Operator 3	222,167		6.80%
AT	Operator 4	47,906		1.50%
	Operator 5	47,001		1.40%
	Operator 6	31,279		1.00%
	Other operators (4)	250,245		7.70%
BE	Belgacom	2,835,480	4,596,402	61.70%
DE	Other operators	1,760,922		38.30%
	Bulgarian Telecommunication Company (incumbent)	Confidential		70.08%
	Mobiltel	Confidential		10.93%
BG	Telenor Bulgaria	Confidential	Confidential	10.57%
	Blizoo Media and Broadband	Confidential		7.58%
	Other operators	Confidential		0.83%
СН	N/A	N/A	N/A	N/A
	N/A	N/A	N/A	N/A
	СҮТА	46820600.00%		83.26%
	PRIMETEL	22216700.00%		9.11%
CY	CABLENET	4790600.00%	331 569	7.02%
	MTN FIXED	4700100.00%		0.61%
	Other operators			
	O2 Czech Republic	Confidential		52.74%
	UPC Česká republika	Confidential		9.73%
CZ	GTS Czech	Confidential	Confidential	4.96%
	České radiokomunikace	Confidential		3.76%
	T-Mobile Czech Republic	Confidential		3.71%
	Other operators	Confidential		25.09%
DE	Telekom Deutschland GmbH	21,490,000	37,160,000	57.8%

	Other operators	15,670,000		42.17%
	TDC	N/A		N/A
DK	Other operators	N/A		N/A
	Elion	338,055		84.56%
	Elion			
EE	Starman	35,330	399,795	8.84%
	Elisa	12,105		3.03%
	STV	14,305		3.58%
	ОТЕ	2808775		58.85%
	FORTHNET	confidential		confidential
EL	HOL	confidential	4,772,844	confidential
	WIND	confidential		confidential
	Other operators	confidential		confidential
ĺ	Telefónica de España	10,575,626		56.02%
l i	Orange	1,925,385		10.20%
	Vodafone	1,755,077		9.30%
ES	Ono	2,122,936	18,879,297	11.24%
ĺ	Jazztel	1,682,758		8.91%
	Other operators	817,515		4.33%
İ	Elisa Oyj		N/A	
ĺ	DNA Oyj			
	TeliaSonera Finland Oyj			N/A
FI	Etelä-Satakunnan Puhelin Oyj	N/A		
	Ålands Telefonandelslag			
	Orange			
FR	Other operators	Confidential	38,699,365	Confidential
	нт	946,455		63.09%
	OPTIMA	158,966		10.60%
HR	VIPnet	149,422	1,500,250	9.96%
	H1	91,286		6.08%
	Other operators	154,121		10.27%
	Magyar Telekom	1,701,156		55.90%
	Invitel	387,411	2.045.040	12.70%
HU	UPC	476,321	3,045,040	15.60%
	Other operators	480,152		15.80%
ΙE	Eircom	N/A	N/A	N/A
	Siminn	91,658		62.62%
IS	Vodafone	37,147	146,361	25.38%

	Other operators	17,556		11.99%
	Telecom Italia S.p.A.	12,126,478		56.50%
	Wind Telecomunicazioni	2,475,368		11.53%
ΙΤ	Fastweb S.p.A.	2,209,834	21,461,995	10.30%
	Vodafone Omnitel B.V. (including TeleTu S.p.A.)	2,343,109		10.92%
	Other operators	2,307,205		10.75%
LI	Telecom Liechtenstein AG	17,785	17,785	100.00%
	TEO LT, AB	500,956		92.20%
	UAB "CSC Telecom"	10,356		1.91%
ιτ	AB "Lietuvos geležinkeliai"	5,420	543,357	1.00%
	UAB "Cgates"	6,174		1.14%
	Other operators	20,451		3.76%
	Lattelecom	300,000		89.02%
	Telekom Baltija	14,000	337,000	4.15%
LV	Baltcom TV	12,000	337,000	3.56%
	Megatel	9,000		2.67%
	Other operators	2,000		0.59%
	EPT	207,000	0.00	77.53%
LU	Other operators	60,000	267,700	22.47%
ME	Crnogorski Telekom	Confidential	Confidential	Confidential
	Mtel			
	Makedonski Telekom AD	229,691		59.45%
	ONE Telecom services	60,613		15.69%
MK	Robi	23,717	386,380	6.14%
	Blizoo	41,655		10.78%
	Other operators	30,704		7.95%
	Go plc	155,232		66.85%
	Melita plc	75,555		32.54%
MT	Vodafone	306	232,213	0.13%
1411	Ozone	837	232,213	0.36%
	SIS	228		0.10%
	Vanilla	55		0.02%
	KPN			
NL	Ziggo	N/A	N/A	
N.	UPC			N/A
	Tele2			
NO	Telenor	791,274	1,156,968	68.39%
	Ventelo	61,311	1,130,300	5.30%

	Tele2	54,371		4.70%
l	Telio	55,528		4.80%
l	Other operators	194,484		16.81%
i	Orange Polska S.A.	Confidential		Confidential
li	NETIA	Confidential		Confidential
l i	Multimedia Polska S.A.	Confidential		Confidential
PL	Multimedia Polska Poludnie S.A.	Confidential	5,477,447	Confidential
	TK Telekom	Confidential		Confidential
	Other operators	746545		14%
	MEO Group (incumbent)	Confidential		54.11%
ı	NOS Group	Confidential		30.61%
РТ	Vodafone	Confidential	4,582,033	9.61%
	Altice Group	Confidential		5.15%
	Other operators	Confidential		0.52%
	TELEKOM RC S.A.	2,355,405		51.12%
li	RCS&RDS S.A.	1,485,215	4,607,967	32.23%
RO	UPC Romania S.R.L.	314,474		6.82%
	VODAFONE ROMANIA S.A.	186,798		4.05%
l	Other operators	266,075		5.77%
	Telekom Srbija		N/A	
l	Orion telekom	1		
RS	Telenor	N/A		N/A
	SBB			
	TeliaSonera	2,796,600		72.89%
li	Comhem	328,300		8.56%
a- 1	Telenor	274,200	2 027 000	7.15%
SE	Alltele	114,400	3,837,000	2.98%
l	TelaVox	78,100		2.04%
	Other operators	245,400		6.40%
	Telekom Slovenije	Confidential		59.61%
	Telemach	Confidential		18.34%
SI	T-2	Confidential	Confidential	10.94%
	Amis	Confidential		5.80%
	Other operators	Confidential		5.31%
	Slovak Telekom*	Confidential		84.56%
CIV.	Orange Slovensko	Confidential	Confidential	8.01%
SK	Swan	Confidential	Connuential	1.52%
	UPC	Confidential		5.91%

	Türk Telekom	11,199,851		87.91%
	TTNet	1,168,350		9.17%
TR	Millenicom	200,559	12,740,000	1.57%
	Turknet	59,732		0.47%
	Other operators	111,508		0.88%
	ВТ	Confidential	26,657,939	Confidential
	TalkTalk	Confidential		Confidential
UK	Sky	Confidential		Confidential
	Virgin Media	Confidential		Confidential
	Vodafone	Confidential		Confidential

#### Notes to table 4:

**BG:** There is no separation between peak/off-peak or interconnection levels. Data concerning number of lines (network termination points) per operator is confidential. Data in the field "Number of lines" refer to the number of fixed telephone subscribers as of 1 July 2014.

**CH:** There exists a "clause of reciprocity", meaning that the tariffs of other operators have to be same as those of Swisscom.

**CY:** There is no separation between peak and off-peak. For CYTA the total number of line termination points are 276,059. 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). Total number of lines respond to date as of 30 June 2014 (data as of 1 January 2015 are not yet available).

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 July 2014 – data for the whole year 2014 are not yet available.

**DE:** The number of lines is based on figures from 2013. Source: BNetzA Annual Report 2013.

**EL:** Data refer to the number of active telephone access lines on 30 June 2014.

**FI:** Figures come from the three biggest operators in terms of market share, together with two smaller operators with a different FTR.

FR: The number of lines at the of end of 2014 is estimated based on data for Q1, Q2 and Q3 2014.

The average FTR 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.

IE: ComReg Decision D12/12 set fixed termination rates at layer one (i.e. ericom's primary). ComReg Decision D12/12 imposed a symmetrical blended rate of 0.098 cent per minute for all SMP fixed operators from 1 July 2013. This blended FTR will reduce to 0.085 cent per minute from 1 July 2014 and to 0.072 cent per minute from 1 July 2015. Please refer to Annex 1 in ComReg Decision D12/12 http://www.comreg.ie/\_fileupload/publications/ComReg12125.pdf

**IT:** The data are based on estimates

LT: The network hierarchy includes only Layer 1 (National) from 1 April 2013 . The number of lines is based on the situation in Q3 2014.

**LU**: Entreprise des Postes et Télécommunications (EPT) FTR average is based on a traffic distribution assumption of 50% peak and 50% off-Peak. Coverage of Layer 1 is a mix of local and regional network hierarchy. Operators don't provide details on the distribution of traffic nor network layers. EPT has 2 IX layers, other operators generally have only one layer; all use set up fees and peak/off peak differentiation.

MT: The number of lines is based on the situation in Q3 2014.

**NO:** Number of lines are provided from 30 June 2014. The total number of lines according to 1 January 2015 will not be available before Q2 2015. The deadline for the operators reporting is in the middle of March 2015.

**PL:** The number of lines (network termination points) include own POTS, ISDN BRA, ISDN PRA lines. Data are for 2013.

RO: The number of lines are from 30 June 2014

**RS:** Data provided are for 2013 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.

**SE:** There are no set-up fees nor any distinction between peak and off peak traffic in terms of the level of FTRs. The number of lines are based on data as of June 30 2014.

**SI:** The absolute number of lines per operator is confidential.

**SK:** The number of lines of Slovak Telekom includes the following type of access: TP1, ISDN BRA, ISDN PRA, TP2M, VoBB access, VoIP access.

**TR:** In Turkey, there is no separation between peak and off-peak. The number of lines for alternative network operators includes the number of wholesale line rental subscribers.

#### 3. Interconnection in mobile networks

#### 3.a. Voice interconnection

This section presents the benchmark of mobile termination rates (MTR) with data as of 1 January 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 January 2015. It includes data from thirty-six (36) NRAs that provided responses.

#### 3.a.1 Assumptions made for the benchmarking

For the present benchmarking exercise the following assumptions have been made in order to make tariffs comparable<sup>4</sup>:

- Operators with a market share below 1.5% have been excluded from the MTR average calculation.
- Only nominal tariffs are represented in the report, defining them as "the price (in eurocent/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. Two general averages at the European level have been calculated: a simple average and a weighted average. The latter weights each country's average rate with the share of the country's subscribers (total subscribers per country / total subscribers in all countries). In the case of the weighted average, only the countries that reported the number of subscribers are taken into account.
- VAT is not included in the revenues.
- For non-Euro countries, the average exchange rate for the fourth quarter of the year, Q4 2014, was used to convert the currencies. The exchange rates used are reported in the Annex.

Regarding the short-term MTR evolution (from July 2014 to January 2015), some variation may be a consequence of any of the following reasons:

- i. Modifications in the tariff structure (for instance, disappearance of the set-up charge or initial period);
- ii. Currency exchange rate variations in non-Euro countries<sup>5</sup>;

<sup>&</sup>lt;sup>4</sup> Generally speaking, these assumptions may create margins of error in the present comparison, making it difficult to draw valid conclusions for policy purposes.

<sup>&</sup>lt;sup>5</sup> This only affects short-term MTR evolution (figure 10) because the percentage of tariff variation in each country (figure 11) has been calculated by comparing rates expressed in terms of the national currency.

- 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.a.2. Average MTR per country: nominal rates per voice minute (as of January 2015)

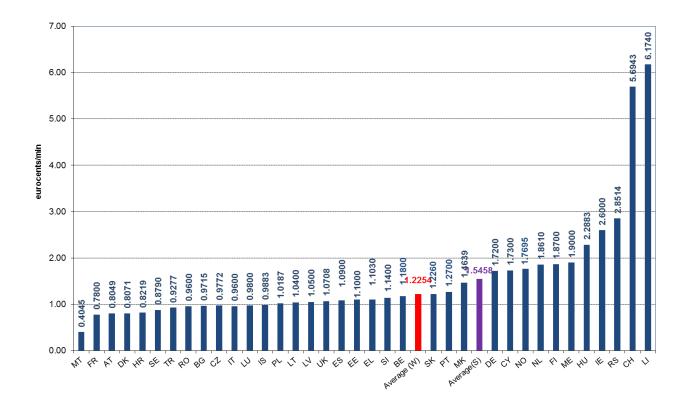
Table 5

Country	Average MTR per country (€cent)
AT	0.8049
BE	1.1800
BG	0.9715
CH	5.6943
CY	1.7300
CZ	0.9772
DE	1.7200
DK	0.8071
EE	1.1000
EL	1.1030
ES	1.0900
FI	1.8700
FR	0.7800
HR	0.8219
HU	2.2883
IE	2.6000
IS	0.9883
IT	0.9600
LI	6.1740
LT	1.0400
LU	0.9800
LV	1.0500
ME	1.9000
MK	1.4639
MT	0.4045
NL	1.8610
NO	1.7695
PL	1.0187
PT	1.2700
RO	0.9600
RS	2.8514
SE	0.8790
SI	1.1400
SK	1.2260
TR	0.9277
UK	1.0708
Average(S)	1.5458
Average (W)	1.2254

**Note to Table 5:** the Weighted Average (W) is calculated taking into account only countries providing the total number of subscribers.

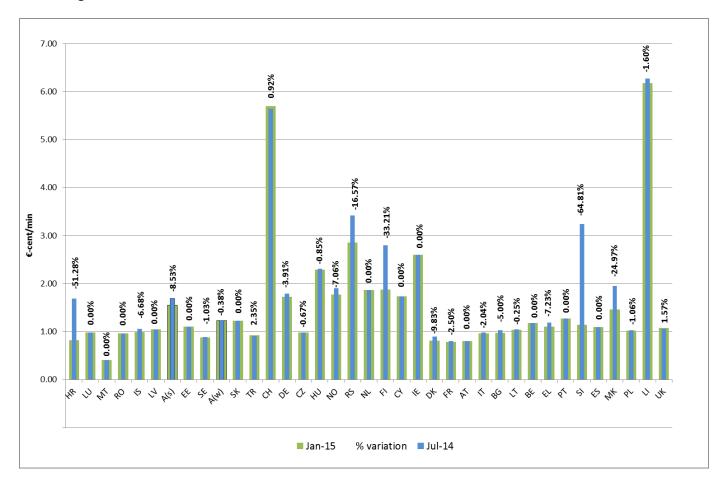
Average MTR per country (January 2015), based on nominal rates (Euro cents per minute of service)

Figure 9



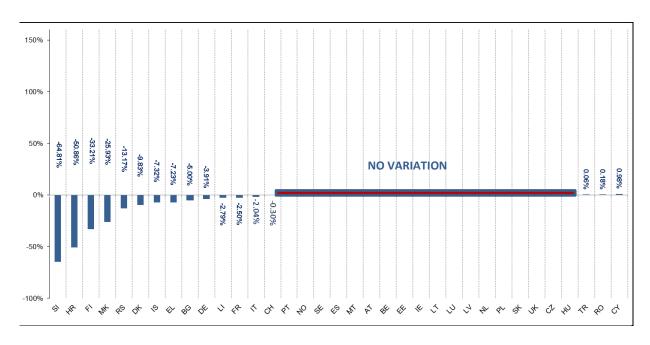
## Short-term evolution of average MTRs per country (from July 2014 to January 2015, in Euro cent)

Figure 10



Percentage variation of average MTRs in <u>national currency</u> per country (from July 2014 to January 2015)

Figure 11



#### 3.a.3. Average MTR per operator: nominal rates

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.

Table 6

Country	Operator	Average effective prices (€cent)	Subscribers	Country total subscribers	Market Share %
	A1Telekom Austria	0.8049	5,500,000		42.15%
AT	T-Mobile	0.8049	4,060,000	13,050,000	31.11%
	H3G (including Orange)	0.8049	3,490,000		26.74%
	Belgacom	1.1800	confidential		40,2 %
BE	Mobistar	1.1800	confidential	12.734.724	23,1 %
	Base	1.1800	confidential		23,0 %
	Mobiltel	0.9715	confidential		37.40%
BG	Telenor Bulgaria	0.9715	confidential	confidential	37.51%
	ВТС	0.9715	confidential		25.09%
СН	Swisscom	5.1889	6,540,000	11,007,980	59.41%

Sunrise         6.4342         2,465,000           Orange         6.4342         2,002,980           Primetel PLC         2.9100         39,000           MTN         1.7090         337,406         1,123,289           CYTA         1.7090         739,398           T-Mobile         0.9772         confidential           CZ         O2 Czech Republic a.s.         0.9772         confidential	22.39% 18.20% 3.45% 29.84% 65.39% 40.45% 36.28% 20.41%
CY         MTN         1.7090         337,406         1,123,289           CYTA         1.7090         739,398           T-Mobile         0.9772         confidential	29.84% 65.39% 40.45% 36.28% 20.41%
CYTA 1.7090 739,398  T-Mobile 0.9772 confidential	65.39% 40.45% 36.28% 20.41%
CYTA <b>1.7090</b> 739,398  T-Mobile <b>0.9772</b> confidential	65.39% 40.45% 36.28% 20.41%
conjusticus.	36.28% 20.41%
	20.41%
CZ O2 Czech Republic a.s. <b>0.9772</b> confidential confidential	
Vodafone <b>0.9772</b> confidential	22.224
T-Mobile <b>1.7200</b> 38,989,000	33.80%
DE Vodafone <b>1.7200</b> 31,515,000 112,629,000	27.03%
E-plus Mobilfunk / 1.7200 42,125,000	16.75%
Telefónica Germany	
TDC <b>0.8071</b> 2,846,941	40.31%
Telia <b>0.8071</b> 1,303,122 7,062,646	18.45%
Telenor <b>0.8071</b> 1,698,104	24.04%
Hi3G <b>0.8071</b> 686,841	9.72%
Telekom (EMT) <b>1.1000</b> 877,868	42.56%
EE Elisa <b>1.1000</b> 666,888 2,062,864	32.33%
Tele2 <b>1.1000</b> 518,108	25.12%
Cosmote <b>1.1030</b> 7,279,669	44,50%
EL Vodafone <b>1.1030</b> 5,100,254 16,358,327	31,18%
Wind <b>1.1030</b> 3,966,399	24,25%
TME <b>1.0900</b> 15,777,630	32.10%
Vodafone <b>1.0900</b> 11,019,343 49,147,939	22.42%
Orange 1.0900 11,430,000	23.26%
Xfera <b>1.0900</b> 3,402,372	6.92%
DNA <b>1.8700</b> n.a.	24.0%
Fl Elisa <b>1.8700</b> n.a. n.a.	40.0%
TeliaSonera 1.8700 n.a.	35.0%
Orange <b>0.7800</b> confidential co	onfidential
SFR 0.7800 confidential	onfidential
FR Bouygues Telecom <b>0.7800</b> confidential 77,236,000	onfidential
Free Mobile 0.7800 confidential co	onfidential
HT <b>0.8219</b> 2,087,839	46.80%
HR VIPnet <b>0.8219</b> 1,568,912 4,461,352	35.17%
Tele2 <b>0.8219</b> 804,601	18.03%
T-Mobile <b>2.2883</b> 5,346,509	46.33%
ни Telenor <b>2.2883</b> 3,580,880 11,540,058	31.03%
Vodafone <b>2.2883</b> 2,612,669	22.64%
Vodafone Ireland         2.6000         1,908,076	39.0%
Three Ireland Hutchison <b>2.6000</b> 1,570,006	32.1%
(formerly Hutchison 3G	
Ireland Limited)	21.0%
Communications 2.8000 1,029,010 4,894,239	£1. <b>U</b> /0
Tesco Mobile Ireland <b>2.6000</b> 291,341	6.0%
Lycamobile Ireland 2.6000 81,271	1.7%

	Siminn	0.9883	132,556		36.32%
	Vodafone	0.9883	96,578	-	26.46%
IS	Nova	0.9883	119,453	365,010	32.73%
	365/Tal	0.9883	13,686	<u> </u>	3.75%
	Telecom Italia	0.9600	31,328,184	-	33.66%
IT	Vodafone Omnitel	0.9600	28,002,198	93,068,939	30.09%
	Wind Telecomunicazioni	0.9600	23,764,534	<u> </u>	25.53%
	H3G	0.9600	9,974,023		10.72%
	Orange (Liechtenstein) AG		confidential		confidential
ш	Swisscom (Schweiz) AG	6.1740	confidential	11.588	confidential
	Telecom (Liechtenstein)  AG		confidential		confidential
	Tele2	1.0400	1,881,976		42.06%
LT	Omnitel	1.0400	1,506,028	4,474,544	33.66%
	Bite Lietuva	1.0400	1,009,059	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,	22.55%
	EPT EPT	0.9800	n.a.		n.a.
LU	Tango	0.9800	n.a.	n.a.	n.a.
LO	Orange	0.9800	n.a.	ii.a.	n.a.
	Tele2	1.0500	940,000		36.91%
	Latvijas Mobilais	1.0500	920,000	2,547,000	36.12%
LV	Telefons	1.0500	320,000		30.1270
	Bite Latvija		470,000		18.45%
	Zetcom	1.0500	150,000		5.89%
	Telenor	1.9000	confidential		confidential
ME	Crnogorski Telekom	1.9000	confidential	confidential	confidential
	Mtel	1.9000	confidential		confidential
	T Mobile Macedonia	1.4639	1,008,358	2,223,260	45.35%
MK	ONE Telecommunication services	1.4639	558,882		25.14%
	VIP Macedonia	1.4639	628,367		28.26%
	Go plc	0.4045	221,703		39.36%
	Melita plc	0.4045	81,420		14.45%
MT	Vodafone	0.4045	249,897	563,335	44.36%
	Redtouch fone	0.4045	10,259		1.82%
	KPN	1.8610	6,016,800		30.76%
NL	T-Mobile	1.8610	3,913,113	19,561,374	20.00%
	Vodafone	1.8610	4,867,400		24.88%
	Telenor	1.7695	2,947,007		49.67%
	TeliaSonera	1.7695	1,359,444		22.91%
NO	Network Norway	1.7695	709,855	5,932,761	11.97%
	Tele2	1.7695	389,660		6.57%
	Ventelo	1.7695	125,436		2.11%
PL	T-Mobile Polska S.A.	1.0187	confidential	56,972,803	confidential
			,	/ /	

	Polkomtel sp. z o.o.	1.0187	confidential		confidential
	Orange Polska S.A.	1.0187	confidential		confidential
	P4. sp. z o.o.	1.0187	confidential		confidential
	T-Mobile Polska S.A.	1.0187	confidential		confidential
	MEO	1.2700	confidential		48 %
D.T.	VODAFONE	1.2700	confidential	16 721 040	33 %
РТ	NOS	1.2700	confidential	16,731,949	19 %
	Vodafone Romania S.A.	0.9600	confidential		confidential
	Orange Romania S.A.	0.9600	confidential		confidential
RO	TELEKOM RMC S.A.	0.9600	confidential	22,920,000	confidential
	(former Cosmote RMT)				
	RCS & RDS S.A.	0.9600	confidential		confidential
	MTS (Telekom Srbija)	2.8514	n.a.		44.56%
RS	Telenor	2.8514	n.a.	n.a.	33.27%
	Vip mobile	2.8514	n.a.		22.17%
	TeliaSonera	0.8790	5,398,400	14,130,000	38.21%
SE	Tele2	0.8790	4,050,300		28.66%
3E	Telenor	0.8790	2,473,300		17.50%
	Hi3G	0.8790	1,706,300		12.08%
	Telekom Slovenije	1.1400	confidential		54.62%
CI	Si.mobil	1.1400	confidential	confidential	29.30%
SI	Tušmobil	1.1400	confidential		13.26%
	T-2	1.1400	confidential		2.83%
	Orange Slovensko	1.2260	confidential		39.42%
SK	Slovak Telekom	1.2260	confidential	confidential	31.70%
	O2 Slovakia	1.2260	confidential		28.88%
	Turkcell	0.8828	34,732,127		48.30%
TR	Vodafone	0.9110	20,945,830	71,908,742	29.13%
	Avea	1.0452	16,230,785		22.57%
	EE	1.0708	confidential		confidential
1114	O2	1.0708	confidential	02.024.204	confidential
UK	Vodafone	1.0708	confidential	83,931,384	confidential
	H3G	1.0708	confidential		confidential

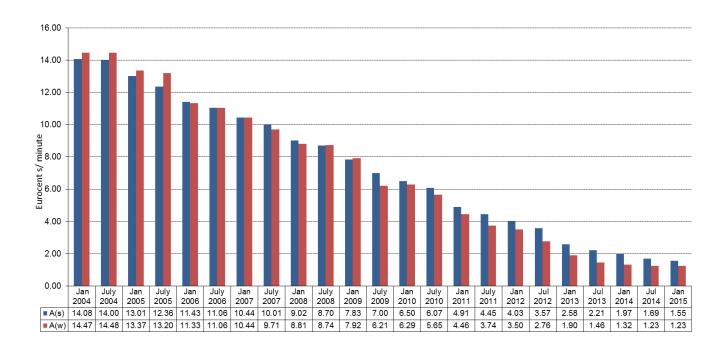
#### Notes to Table 6:

- 1. **BG:** Data as of 1 October 2014.
  - Figures include post-paid and pre-paid active mobile subscribers. The number of post-paid active subscribers means the number of subscribers with a valid contract. The number of pre-paid active subscribers includes the number of subscribers that have made or received a call, sent an SMS or MMS or used data services at least once in the last three months. The number of M2M SIMs is excluded.
- 2. **CH**: Figures based on the subscriber base as of 31 December 2014.
- 3. **CZ**: Market Shares as of 30 June 2014 (data as of 1 January 2015 are not yet available).

- 4. **DE**: Current MTRs are valid from 1 December 2014 until 30 November 2015. They are preliminary and still subject to a Phase II investigation.
  - The number of subscribers are as of Q4 2014. After the merger of Telefónica and E-Plus joint subscriber numbers are reported from Q4 2014.
- 5. **EL**: The number of subscribers is from 31 December 2014
- 6. **FI**: The number of subscribers if from 30 June 2014. Altogether, the market share of the three biggest operators is
- 7. **HU**: The number of subscribers is from July 2014
- 8. **IE**: Telefonica Ireland Limited subscriptions data is incorporated with Hutchison 3G Ireland Limited subscriptions data. 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/6681 dee 4565 ecf2c80256 e7e0052005 b/005d4340 da 18896480257 bc7003 cd0090? Open Document & Highlight = 0, voda fone
  - 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 The High Court judgment is currently under appeal to the Supreme Court and 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
- 9. **IS:** The number of subscribers is from 30 June 2014.
- 10. **IT:** AGCOM has estimated the number of subscribers. The rate for 2015 is under review. The value of 0.96 €cent/min has been proposed during the national public consultation.
- 11. LI: Operator specific data on MTRs are confidential
- 12. LT: The number of subscribers is from Q3 2014.
- 13. **MT:** The number of subscribers is from Q3 2014. The MTRs are applicable from 1 April 2014 and are based on pure BU LRIC.
- 14. **NL:** The number of subscribers are from Q3 2014.
- 15. **NO**: The numbers of subscribers are from 30 June 2014.
- 16. **PL**: The number of subscribers are from 31 December 2013 (subscriber data from 31 December 2014 are not available).
- 17. **RS**: Market shares are for 2014. The quoted price is valid as of 1 January 2015.
- 18. **SE**: The number of subscribers is based on the latest available data, which is 30 June 2014.
- 19. **SI**: The absolute number of subscribers per operator is confidential.
- 20. TR: The number of subscribers is from Q3 2014.

#### Average MTR: simple average and weighted average time series

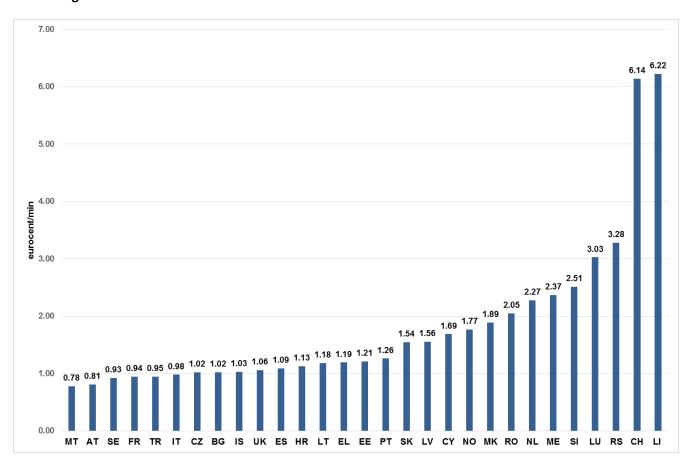
Figure 12



**Note to figure 12**: 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.a.4. Average wholesale termination revenues per country (euro cent)

Figure 13



#### Notes to figure 13:

- 1. The average wholesale termination revenue is obtained as a ratio of total revenues from national 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.
- 2. Some countries do not collect information about termination revenues. Please also note as indicated that revenue data mostly refer to 2014 (whole year or part of the year).
- 3. **BG**: Figures are based on the traffic originated in national fixed networks and terminated in mobiles networks and the corresponding revenue. Excluded are fixed-to-mobile calls when both the fixed and the mobile network are owned and run by the same operator.
- 4. **CZ**: Data are from 1 July 2014.
- 5. **FR:** Data are from Q1 to Q3 2014.
- 6. **IS:** Data are ffrom the first half of 2014.
- 7. **LT:** Data are from Q3 2014 only.
- 8. **LU**: Data are fromQ1 and Q2 2014. There have been new tariffs since 1 February 2014, based on BU-LRIC.
- 9. LV: Data are from Q1 and Q2 2014. MTRs were changed on 1 July 2014.
- 10. **ME:** Data are only for national traffic.
- 11. **MT**: Data are from January to September 2014.
- 12. **MK**: Data are from Q1-Q3 2014.

- 13. **NL**: Data are from Q1-Q3 2014.
- 14. **NO**: Data are from the first half of 2014.
- 15. **RO**: Provisional unaudited data.
- 16. **RS**: Data provided are for 2014 and include 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.
- 17. **SE**: The latest full year data is for 2013, so the data provided here is an estimate for 2014. The average revenue per minute is a result of two different levels applicable during 2014 (SEK 0.09 and SEK 0.0815). SEK 0.0815 is the current MTR applicable as reported in the following sheets in this workbook.
- 18. SI: Including international termination. Self-supply is not included.
  MTR revenues and minutes also include traffic terminated on premium numbers, numbers for televoting, mass calling and short dialling numbers.
- 19. **TR**: Total MTR minutes includes only calls that originate and terminate within Turkey.
- 20. **UK**: Data are from 2014.



# **3.a.5.** Regulatory model implemented and glide paths for MTRs

Table 7

	COST ACCOUNTING MODEL		GLIDE PATH in €cent					
	Model	BU LRIC rate (Target rate) €cent	BU LRIC rate applied from	Period 1 (01/01/2015 - 30/06/2015)	Period 2 (01/07/2015 - 31/12/2015)	Period 3 (01/01/2016 - 30/06/2016)	Period 4 (01/07/2016 - 31/12/2016)	Period 5 01/01/2017 - 30/06/2017)
АТ	Pure BU LRIC	0.8049	01/11/2013	0.8049	0.8049			
ВЕ	Pure BU LRIC	1.0800	01/01/2013	1.1800	1.1800			
BG	Pure BU LRIC	0.9715	01/01/2015					
СН	Commercial negotiations							
CY	Benchmark or TD				BU LRIC model	BU LRIC model	BU LRIC model	BU LRIC model
CZ	Pure BU LRIC	0.9772	01/07/2013					
DE	BU LRAIC+		01/01/2013	1.7200	1.6600			
DK	Pure BU LRIC		01/01/2013	0.8071	Not decided	Not decided	Not decided	Not decided
EE	Benchmark			1.1000	1.1000	1.0000	n/a	n/a

EL	Pure BU LRIC	1.1030	01/01/2015	1.1030	1.1030	n/a	n/a	n/a
ES	Pure BU LRIC	1.0900	01/07/2013					
FI	FDC							
FR	Pure BU LRIC	0.7800	01/01/2013 and 01/07/13	0.7800	0.78	0.7600	0.7600	0.7400
HR	Pure BU LRIC	0.8219	01/01/2015	0.8219	0.8219	n/a	n/a	n/a
HU	Pure BU LRIC	0.5542	01.04.2015	2.2883	0.5540	0.5540	0.5540	not defined
IE	other							
IS	Benchmark			0.9883	0.9883			
IT	Pure BU LRIC	0.9800	01/07/2013	0.9600	0.9600	0.9400	0.9400	0.9200
ш	Benchmark			6.3512	6.3512			
LT	Benchmark			1.0400				

LU	Pure BU LRIC	0.9700	s1 or s2 2015					
LV	Benchmark	1.0500	01/07/2014					
ME	HCA FDC	1.9000						
МК	BU LRAIC+	1.4634	01/09/2014					
MT	Pure BU LRIC	0.4045	01/04/2014					
NL	BU LRAIC+	1.0190						
NO	BU LRAIC	0.9179	1st July 2015	0.0177	0.0092	0.0083	0.0083	0.0072
PL	Pure BU LRIC	1.0187	01/07/2013	1.0187	1.0187	1.0187	1.0187	1.0187
PT	Pure BU LRIC	1.2700	31/12/2012	1.2700				
RO	Pure BU LRIC	0.9600	01/04/2014					
RS	Benchmark							
SE	Pure BU LRIC	0.8800	01/07/2013	0,879				
SI	Pure BU LRIC	1.1400	01/09/2014					
SK	Pure BU LRIC	1.2260	01/08/2013					
TR	BU LRAIC+							

UK	Pure BU LRIC	1.0708	01/04/2013	1.0010	0.8620	0.7570	0.6500	0.6460
LI	Benchmark		01/01/2013	6.3512				

#### Notes to Table 7:

- 1. **CH**: No glide path.
- 2. **CY**: A final decision based on the BU LRIC model results is expected to be applied in summer 2015.
- 3. **CZ**: No glide path mechanism was applied for the time period 01/01/2015 30/06/2017. From July 2014 the level of MTRs has been set at 0.27 CZK per minute for all SMP-operators in relevant market 7. CTU currently doesn't assume any changes for the time period 01/01/2015 30/06/2017. Regulated MTRs have been calculated in accordance with Recommendation 2009/369/ES.
- 4. **DE**: No glide path regulation. Current MTRs (as indicated in Period 1) are valid from 01.12.2014 until 30.11.2015. Adjustments in the model lead to MTRs as indicated in Period 2, which are valid from 01.12.2015. The decision is preliminary and still subject to a Phase II investigation.
- 5. FI: The MTR of 1.87 has been valid since September 2014. Glide paths have not been implemented.
- 6. **HU:** Period 1 from 01/01/2015 until 31/03/2015, period 2 from 01/04/2015 until 31/12/2015
- 7. **IE:** No glide path is in operation in Ireland.

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
- 8. Is: The benchmark will be reset annually. The benchmark resulting in ISK 1.52 for 2015 will be revisited before the end of the year to set prices for 2016.
- 9. **IT**: The glide path is currently under review.
- 10. LI: The last step of glide path, effective since 1 January 2013: 0.0765 CHF/min.
- 11. **LT**: RRT finished the market analysis and set mobile termination rates for SMP operators in August 2014. RRT used a benchmark method for establishing the rates and used countries that have pure BU-LRAIC only. The average was calculated as 1.04 Euro cent/min.
- 12. **LU**: ILR/Luxembourg doesn't use a glide path to lower MTR tariffs.
- 13. LV: SPRK doesn't apply a glide path. MTRs were adopted by the final decision on 1 July, 2014.
- 14. **ME:** A glide path is not foreseen in the present regulation.
- 15. **NO**: In our current regulation MTRs are determined by a BU LRAIC model (without the +).

  Nkom made a new decision in market 7 on 13 January 2015, and maximum prices for call termination based on pure LRIC will be in effect from 1 July 2015.

  The maximum prices are based on the efficient costs for each individual year and do not represent a glide path towards a future efficient price.
- 16. **PT:** By a decision approved on 30 April 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. Currently a new market analysis on the mobile termination markets is being developed and the pure LRIC cost model is being updated in order for ANACOM to determine a new MTR.
- 17. **RS**: The price of 3.43 RSD is effective from 1 January 2015, until RATEL's new decision.
- 18. **SE**: The current MTR is based on pure-LRIC, hence no glide path is foreseen. However, any future update of the model might change the level of MTRs.
- 19. **SK**: No glide path is in use.
- 20. **TR**: ICTA does not regulate MTRs via a glide path, in general MTRs are revised annually.
- 21. **UK**: Ofcom's MTR charge control runs from 1 April to 1 April. The above charges have been calculated as a time weighted average over the relevant period. Charges are nominal estimates taken from Table 1 of Ofcom's final 2015 MCT Statement at http://stakeholders.ofcom.org.uk/binaries/consultations/mobile-call-termination-14/statement/MCT\_final\_statement.pdf

#### 3.b. 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 S1 2015, referring to data as of January 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 considered<sup>6</sup>).

### 3.b.1. Assumptions and benchmarking methodology

The SMS TRs collected in this report reflect nominal 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 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. Slovenia and Serbia are the only countries 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. Therefore, some

<sup>6</sup> 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.

peculiarities in setting SMS TRs could emerge and require additional assumptions (as compared to the exercise of benchmarking 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 Annex are used.

### 3.b.2. SMS TR per operator

Table 8

		SMS TR (	€cent)	Subscribers		Market share
Country	Operator	per operator	per country	per operator	per country	
	Mobilkom	n.a.		5,500,000		42.15%
AT	T-Mobile	n.a.	3.11	4,060,000	13,050,000	31.11%
	Orange (H3G)	n.a.		3,490,000		26.74%
	Belgacom	4.96		confidential		40,2 %
BE	Mobistar	4.96	4.96	confidential	12.734.724	23,1 %
	KPN	4.96	1	confidential	7	23,0 %
	Mobiltel	confidential		confidential		37.40%
BG	Telenor Bulgaria	confidential	confidential	confidential	confidential	37.51%
	BTC Mobile	confidential	]	confidential		25.09%
	Swisscom	confidential		6,540,000	11,007,980	59.41%
СН	Sunrise	confidential	4.2473	2,465,000		22.39%
	Orange	confidential		2,002,980		18.20%
	Cytamobile Vodafone	0.5500		739,398		65.39%
CY	MTN	0.6800	0.5970	337,406	1,123,289	29.84%
	PrimetelMobile	0.7300		39,000		3.45%
	T-Mobile	confidential		confidential		40.45%
CZ	O2 Czech Republic	confidential	confidential	confidential	confidential	36.28%
	Vodafone	confidential		confidential		20.41%
DE	T-Mobile	N/A		38,989,000		33.80%
DE	Vodafone	N/A	n.a.	31,515,000		27.03%

Toc		E-plus Mobilfunk / Telefónica Germany	N/A		42,125,000	112,629,000	16.75%
Telenor		TDC	0.1475		2,846,941		40.31%
Telenor	DV	Telia	0.1475	0.1475	1,303,122	7,062,646	18.45%
EMT AS   2.6000   2.3128   877,868   666,888   2,062,864   32.33%   25.12%	DK	Telenor	0.1475		1,698,104	7,062,646	24.04%
EE   Elisa Eesti AS   2.1000   2.3128   666,888   2,062,864   32.33%   72.512%   72.79,669   72.79,699   72.79,6		Hi3G	0.1475		686,841		9.72%
Tele2 Eesti AS   2.1000   518,108   25.12%		EMT AS	2.6000		877,868		42.56%
Cosmote   3.0000   7,279,669   16,358,327   31,18%   24,25%   3.0000   3.0000   5,100,254   16,358,327   31,18%   24,25%   3.0000   3,966,399   24,25%   32,10%   22,425%   24,25%	EE	Elisa Eesti AS	2.1000	2.3128	666,888	2,062,864	32.33%
EL Vodafone 3.0000 3.0000 5.100,254 16,358,327 31,18% 24,25%		Tele2 Eesti AS	2.1000	1	518,108		25.12%
Wind   3,0000   3,966,399   24,25%   24,25%   24,25%   3,966,399   24,25%   3,966,399   24,25%   3,966,399   24,25%   3,966,399   24,25%   3,210%   2,2400   15,777,630   11,019,343   49,147,939   23,26%   6,92%   6,93%   6,939		Cosmote	3.0000		7,279,669		44,50%
Movistar   2.7000   Vodafone   2.4000   2.7304   11,019,343   11,430,000   49,147,939   22.42%   23.26%   23.26%   24.00%   24.00%   25.032   25.032   25.032   25.032   25.032   25.032   23.764,534   25.53%	EL	Vodafone	3.0000	3.0000	5,100,254	16,358,327	31,18%
Consideration   Confidential   Con		Wind	3.0000	1	3,966,399	1	24,25%
TelaSonera Finland   TelaSonera Finland   Telacomunicazioni   TelaSonera Finland   Telacomunicazioni   T		Movistar	2.7000		15,777,630		32.10%
FI   FI   FI   Confidential   Conf	FC	Vodafone	2.4000	2.7304	11,019,343	40 147 030	22.42%
TeliaSonera Finland   Elisa   Confidential   Confidential   DNA   N.A.   N.A.	ES	Orange	3.1000	1	11,430,000	49,147,939	23.26%
FI   Elisa   Confidential   Confidential   N.A.   N.A.   N.A.   35.0%		Yoigo	2.7000	] [	3,402,372		6.92%
DNA   SFR   1.0000   1.0000   Confidential   Conf		TeliaSonera Finland			N.A.		24.0%
Confidential   Conf	FI	Elisa	confidential	confidential	N.A.	n.a.	40.0%
The complete complete confidential   Confidential		DNA			N.A.		35.0%
Bouygues Telecom   1.0000   1.0000   Confidential   T7,236,000   Confidential		Orange	1.0000		confidential		confidential
Bouygues Telecom   1.0000	ED	SFR	1.0000	1,0000	confidential	77 236 000	confidential
HR VIPnet n.a. n.a. 1,568,912 4,461,352 35.17%  TELE2 n.a. 804,601 18.03%  T-Mobile 4.5765 5,346,509 46.33%  Vodafone 4.5765 5,346,509 11,540,058 31.03%  Vodafone 4.5765 2,612,669 22.64%  Meteor 3.17 1,908,076 39.0%  Telefonica Ireland 3.17 1,570,006 32.1%  Vodafone 3.17 1,029,010 4,894,239 21.0%  Vodafone 3.17 81,271 1.7%  Siminn 2.5032 2,5032 132,556 363,2%  Vodafone 2.5032 96,578 365,010 32.73%  Telecom Italia confidential Vodafone Omnitel N.V. 33.66%  Vodafone Omnitel N.V. 33.65,010 33.66%  Vodafone Omnitel N.V. 33.65,010 33.66%  Vodafone Omnitel Confidential Vodafone Omnitel N.V. 33.65,010 33.66%  Telecomunicazioni 3.2530 23,764,534 25.53%	110	Bouygues Telecom	1.0000	1.0000	confidential	77,230,000	confidential
HR		Free Mobile	1.0000		confidential		confidential
TELE2   n.a.   804,601   18.03%		HT	n.a		2,087,839		46.80%
T-Mobile	HR	VIPnet	n.a.	n.a.	1,568,912	4,461,352	35.17%
Telenor   4.5765   3,580,880   11,540,058   31.03%			n.a.		804,601		18.03%
Vodafone		T-Mobile	4.5765	] [	5,346,509		46.33%
Meteor   3.17   1,908,076   39.0%   39.0%   32.1%   1,570,006   3.17   1,570,006   32.1%   1,570,006   32.1%   1,570,006   3.17   1,029,010   4,894,239   21.0%   6.0%   1.7%	HU	Telenor	4.5765	4.5765	3,580,880	11,540,058	31.03%
Telefonica Ireland   3.17   1,570,006   4,894,239   21.0%     Vodafone   3.17   291,341   6.0%     Hutchinson 3G   3.17   81,271   1.7%     Siminn   2.5032   132,556   26.46%     Nova   2.5032   119,453   365,010     Telecom Italia   Confidential   Vodafone Omnitel   N.V.   Wind Telecomunicazioni   Telecomunicazioni   3.2530   23,764,534   25.53%     Telecomunicazioni   3.2530   23,764,534   32.1%     32.1%   32.1%   32.1%   32.1%     4,894,239   21.0%   6.0%     4,894,239   21.0%     6.0%   1.7%   36.32%   26.46%     36.32%   26.46%   32.73%     36.32%   26.46%   32.73%     32.1%   21.0%   21.0%     4,894,239   21.0%     6.0%   1.7%   1.7%     1.7%   36.32%   26.46%     32.1%   21.0%     4,894,239   21.0%     6.0%   1.7%   1.7%     1.7%   36.32%   26.46%     32.1%   21.0%     1.7%   291,341   5.0%     1.7%   36.32%   26.46%     32.1%   21.0%     1.7%   291,341   5.0%     1.7%   36.32%   26.46%     32.1%   21.0%     1.7%   291,341   5.0%     1.7%   36.32%   26.46%     32.1%   21.0%     1.7%   291,341   5.0%     1.7%   36.32%   26.46%     32.73%   36.32%     25.46%   32.73%     32.73%   36.32%     26.46%   32.73%     32.73%   36.32%     26.46%   32.73%     32.73%   36.32%     25.46%   32.73%     32.73%   36.32%     25.53%   36.32%     25.53%   36.32%     26.46%   32.73%     27.73%   32.73%     28.73%   28.73%     28.73%   2		Vodafone	4.5765		2,612,669		22.64%
Tesco Mobile   3.17   3.17   1,029,010   4,894,239   21.0%			3.17	]			39.0%
Vodafone   3.17   291,341   6.0%		Telefonica Ireland	3.17	]	1,570,006		32.1%
Hutchinson 3G   3.17   81,271   1.7%	IE	Tesco Mobile	3.17	3.17	1,029,010	4,894,239	21.0%
Siminn   2.5032   2.5032   96,578   365,010   36.32%   26.46%   365,010   32.73%   32.73%   33.75%   33.75%   33.66%   33.66%   33.66%   33.66%   33.66%   33.66%   33.66%   33.09%   33.09%   33.2530   33.		Vodafone	3.17	]	291,341		6.0%
Vodafone   2.5032   2.5032   365,010   26.46%   32.73%   32.73%   365,010   26.46%   32.73%   365,010   32.73%   365,010   32.73%   37.5%		Hutchinson 3G	3.17		81,271		1.7%
Nova   2.5032   119,453   365,010   32.73%   365,		Siminn	2.5032	]	132,556		36.32%
Nova   2.5032   119,453   32.73%   365/Tal   2.5032   13,686   3.75%   3.75%	IS	Vodafone	2.5032	2.5032	96,578	365 010	26.46%
Telecom Italia   Confidential   31,328,184   33.66%	.5	Nova	2.5032		119,453	303,010	32.73%
Vodafone Omnitel confidential 28,002,198 93,068,939  Wind confidential Telecomunicazioni 3.2530  N.V. 23,764,534  28,002,198 93,068,939		365/Tal	2.5032		13,686		3.75%
N.V. 93,068,939  Wind confidential 7elecomunicazioni 3.2530  Telecomunicazioni 23,764,534		Telecom Italia	confidential	] ]	31,328,184	_	
Wind confidential 3.2530 23,764,534 25.53%	IT		confidential		28,002,198		30.09%
Wind confidential 3.2530 23,764,534 25.53%				<u> </u>		93,068,939	
H3G confidential 9 974 023 10 72%			confidential	3.2530	23,764,534		25.53%
3,377,023		H3G	confidential	1	9,974,023	1	10.72%

	Orange	confidential		confidential		confidential
	(Liechtenstein) AG					
ш	Swisscom (Schweiz) AG	confidential	4.2312	confidential	confidential	confidential
	Telecom	confidential	ł	confidential		confidential
	(Liechtenstein) AG	comidential		Communition		communitian
	Omnitel	0.7250		1,881,976		42.06%
LT	Tele2	0.7250	0.8687	1,506,028	4,474,544	33.66%
	Bitė Lietuva	1.4500	1	1,009,059		22.55%
	EPT	n.a.		n.a.		n.a.
LU	Tango	n.a.	n.a.	n.a.	n.a.	n.a.
	Orange	n.a.		n.a.		n.a.
	LMT	2.1300		940,000.00		36.91%
LV	Tele2	2.1300	2.1300	920,000.00	2,547,000	36.12%
	Bite Latvija	2.1300		470,000.00		18.45%
	Telenor	2.200		confidential		confidential
ME	Crnogorski Telekom	2.200	2.200	confidential	confidential	confidential
	Mtel	2.200		confidential		confidential
	T Mobile Macedonia	0.8129		1,008,358		45.35%
	ONE		1			
MK	Telecommunication	0.8129	0.8129	558,882	2,223,260	25.14%
	services		]			
	VIP Macedonia	0.8129		628,367		28.26%
	GoMobile	1.8300	]	221,703		39.36%
MT	Melita Mobile	1.5600	1.7767	81,420	563,335	14.45%
	Vodafone	1.8000		249,897		44.36%
	KPN	5.6000	]	6,016,800		30.76%
NL	T-Mobile	5.6000	5.6000	3,913,113	19,561,374	20.00%
	Vodafone	5.6000		4,867,400		24.88%
	Telenor	3.8708		2,947,007		49.67%
	TeliaSonera	3.8708		1,359,444		22.91%
NO	Network Norway	3.8708	3.8708	709,855	5,932,761	11.97%
	Tele2	3.8708		389,660		6.57%
	Ventelo	3.8708		125,436		2.11%
	T-Mobile Polska	1.1873		confidential		confidential
PL	Polkomtel	1.1873	1.1873	confidential	56,972,803	confidential
	PTK Centertel	1.1873		confidential	_	confidential
	P4	1.1873		confidential		confidential
	MEO (ex TMN)	confidential		confidential		48 %
PT	VODAFONE	confidential	1.2700	confidential	16,731,949	33 %
	NOS (ex OPTIMUS+ZON)	confidential		confidential		19 %
	Vodafone Romania	2.4218		confidential		confidential
RO	S.A.	···•	2.4127			
	Orange Romania S.A.	2.4004		confidential	22,920,000	confidential

	TELEKOM RMC S.A.	2.4373		confidential		confidential
	(former Cosmote					
	RMT)					
	RCS & RDS S.A.	2.3692		confidential		confidential
	MTS (Telekom Srbija)			confidential		44.56%
RS	Telenor	Bill & Keep	Bill & Keep	confidential	confidential	33.27%
	Vip mobile			confidential		22.17%
	TeliaSonera	3.2356		5,398,400		38.21%
SE	Tele2	3.2356	3.2356	4,050,300	14,130,000	28.66%
SE	Telenor	3.2356	3.2350	2,473,300	14,130,000	17.50%
	Hi3G	3.2356	1	1,706,300		12.08%
	Telekom Slovenije			confidential		54.62%
SI	Si.mobil	D:II 0 14	Bill & Keep	confidential	- confidential	29.30%
31	Tušmobil	Bill & Keep		confidential		13.26%
	T-2			confidential		2.83%
	Orange Slovensko	2.5000		confidential		39.42%
SK	Slovak Telekom	2.5000	2.6444	confidential	confidential	31.70%
	O2 Slovakia	3.0000		confidential		28.88%
	Turkcell	0.1518		34,732,127		48.30%
TR	Vodafone	0.1518	0.1550	20,945,830	71,908,742	29.13%
	Avea	0.1660	1	16,230,785	1	22.57%
	EE	confidential		confidential		confidential
UK	02	confidential	2.0733	confidential	02 021 204	confidential
UK	Vodafone	confidential	2.0/33	confidential	83,931,384	confidential
	H3G	confidential	1	confidential	1	10.18%

#### Notes at Table 8:

- 1. The numbers of subscribers used in the table come from the MTR benchmark in this report (January 2015).
- 2. AT: Only the average rate is indicated.
- 3. **BG:** Data comes from 1 October 2014 and include post-paid and pre-paid active mobile subscribers. The number of post-paid active subscribers means the number of subscribers with a valid contract. The number of pre-paid active subscribers includes the number of subscribers that have made or received a call, sent an SMS or MMS or used data services at least once in the last three months. The number of M2M SIMs is excluded.
- 4. **CH**. The subscriber base is from 31 December 2014. Different prices are defined between some operators: the weighted average rate at national level is indicated. A different (lower) price is applied between the operators for unbalanced traffic over 110.
- 5. **CZ:** Market shares are from 30 June 2014 (data as of 1 January 2015 is not yet available).
- 6. **DE**: SMS termination rates are not regulated in Germany. The number of subscribers are as of 4th quarter 2014. After the merger of Telefónica and E-Plus joint subscriber numbers are reported from Q4 2014.
- 7. **EE**: Different prices are defined between pairs of operators: a simple average for each operator is indicated.
- 8. EL: Subscriber data refers to registered subscribers as of 31 December 2014.
- 9. HR: SMS call termination rates are subject to commercial agreement between operators.
- 10. **HU:** SMS termination rates in the national currency have not decreased, only the HUF / Eur exchange rate has changed. New subscriber data is not available. Subscriber data is from July 2014.

- 11. **IE**: Telefonica Ireland Limited subscriptions data is incorporated with Hutchison 3G Ireland Limited subscriptions
- 12. IS: The number of subscribers is from 30 June 2014.
- 13. IT: AGCOM has estimated the number of subscribers.
- 14. LT: Different prices are defined between pairs of operators (also BAK): a simple average for each operator is indicated. Subscriber numbers are from Q3 2014.
- 15. LU: SMS interconnection is not under a regulatory regime in Luxembourg.
- 16. ME: SMS termination rates are valid only for the termination of national SMSs.
- 17. MT: The data reflects the position from Q1 2014 to Q3 2014 (January to September).
- 18. **NL:** This is the last known commercially agreed SMS-termination rate. The number of subscribers is based on Q3 2014 data.
- 19. NO: The numbers of subscribers are provided from 30 June 2014.
- 20. PL: The number of subscribers is from 31 December 2013.
- 21. RS: Market shares are for 2013.
- 22. **SE**: The number of subscribers is based on latest available data, which is 30 June 2014. PTS does not monitor SMS wholesale termination rates. The current reference offers indicate a termination rate of SEK 0.30. However, statistics shows that the average retail revenue per sent SMS was SEK 0.17 in 2013, clearly indicating that a wholesale level of SEK 0.30 is too high.
- 23. SI: SMS termination rates are not regulated. Operators apply a "bill and keep" system.
- 24. SK: Slovak Telekom:

up to 100 000 SMS/month = 0.0284 EUR 100 001 - 500 000 SMS/month = 0.0261 EUR from 500 001 SMS/month = 0.0250 EUR

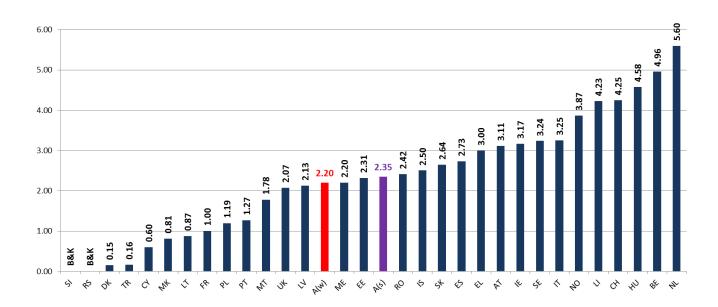
Termination rates continue to vary with respect to terminated traffic volumes.

25. TR: The number of subscribers is from Q3 2014.

## 3.b.3. SMS TR per country

The following graph (figure 14) gives an overview of SMS TRs in January 2015 per country (€cent).<sup>7</sup>

Figure 14



<sup>&</sup>lt;sup>7</sup> The averages are slightly higher in January 2015 compared to July 2014, due to the inclusion of additional countries that did not provide information for July 2014.

#### 4. Annex

**TABLE 9 – ABBREVIATIONS** 

AT Austria BE Belgium **BG** Bulgaria СН Switzerland CY Cyprus CZ Czech Republic DK Denmark DE Germany EE Estonia EL Greece ES Spain FI **Finland** FR France HR Croatia HU Hungary ΙE Ireland IS Iceland IT Italy LI Liechtenstein LT Lithuania LV Latvia LU Luxembourg ME Montenegro MK 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** 

TABLE 10 - EXCHANGE RATES<sup>8</sup>

COUNTRY	1 EURO
BG	1.96
CH	1.23
CZ	27.63
DK	7.46
HR	7.67
HU	308.53
IS	153.80
LI	1.21
LT	3.45
LV	0.70
MK	61.48
NO	9.04
PL	4.21
RO	4.43
RS	120.29
SE	9.27
TR	2.83
UK	0.79

<sup>&</sup>lt;sup>8</sup> ECB website: <a href="http://sdw.ecb.europa.eu/browseSelection.do?DATASET=0&FREQ=A&node=2018794">http://sdw.ecb.europa.eu/browseSelection.do?DATASET=0&FREQ=A&node=2018794</a> For IS at <a href="http://www.cb.is/exchange-rate/">http://www.cb.is/exchange-rate/</a>.