

Termination rates at European level

July 2016

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1. Executive Summary

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

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

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

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

The present overview of TRs is based upon the results of a request for information sent to all NRAs in July 2016, referring – if not differently indicated – to data as of 1st July 2016. It includes rates from the thirty seven (37) NRAs¹ that provided responses to our request.

As of July 2016, this is the situation regarding TRs in Europe:

- The lowest regulated FTR simple average of incumbents at the European level (all 37 countries) stands at 0.3828 eurocents per minute.
- The lowest FTR simple average of European Union incumbents stands at 0.2355 eurocents per minute.

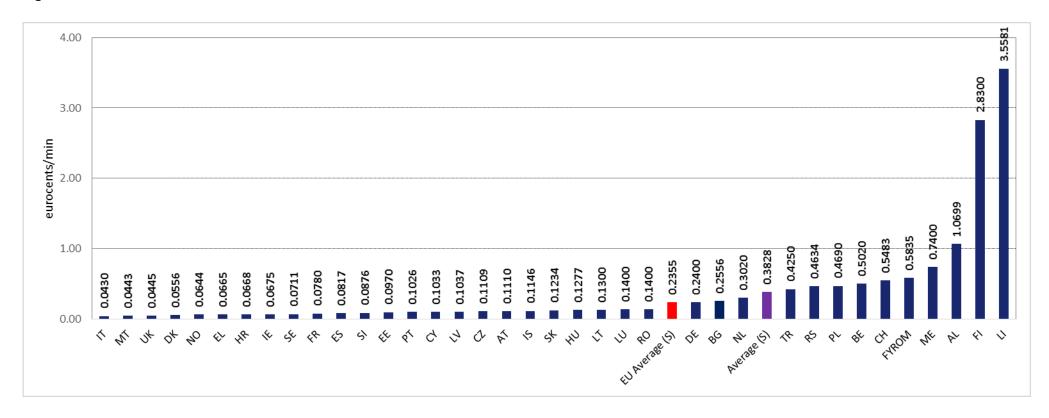
¹ 28 EU member states plus 4 EFTA states (Switzerland, Iceland, Norway and Liechtenstein) and 5 candidate states Albania, Montenegro, FYROM, Serbia and Turkey.

- The MTR simple average (A(s)) at the European level (all 37 countries) stands at 1.27 eurocents per minute, whereas the weighted average (A(w)) at European level is estimated at 1.14 eurocents per minute.
- The MTR A(s) at the EU level (only EU member states) stands at 1.04 eurocents per minute, whereas A(w) at EU level is estimated at 1.08 eurocents per minute.
- The SMS TR A(s) at the European level is 2.49 eurocents per SMS, whereas A(w) is reported to be 2.20 eurocents per SMS.
- Since not all EU member states report their SMS TR, no averages at the EU level could be calculated.

For non-euro countries, the average exchange rate for the second quarter of the year (Q2 2016) was used for the calculation of MTRs and SMS TRs. The exchange rates used are reported in Annex 10.

Overview of incumbents' lowest²³ regulated fixed termination rates per country – July 2016 (Euro cents per minute of service)

Figure 1 FTRs

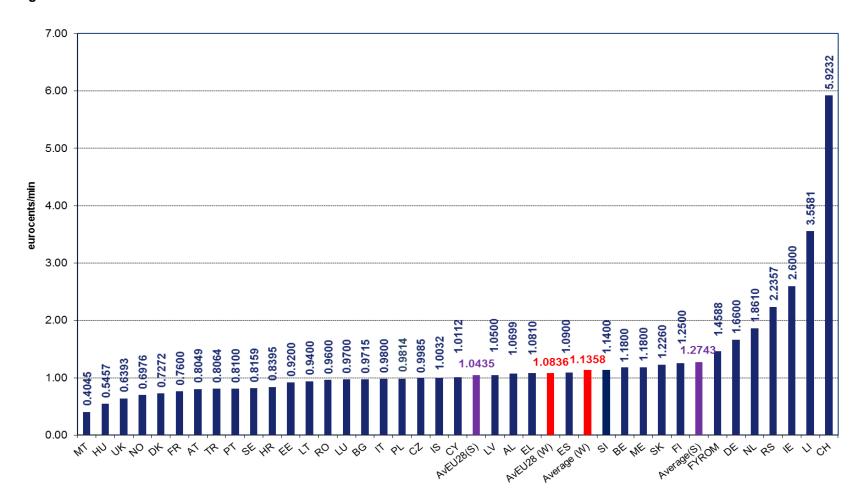


² The lowest regulated rate of the incumbent. In case the operator uses only one rate, it is considered as a single rate.

³ Due to the large number of incumbents present in Finland a weighted average is included for comparison.

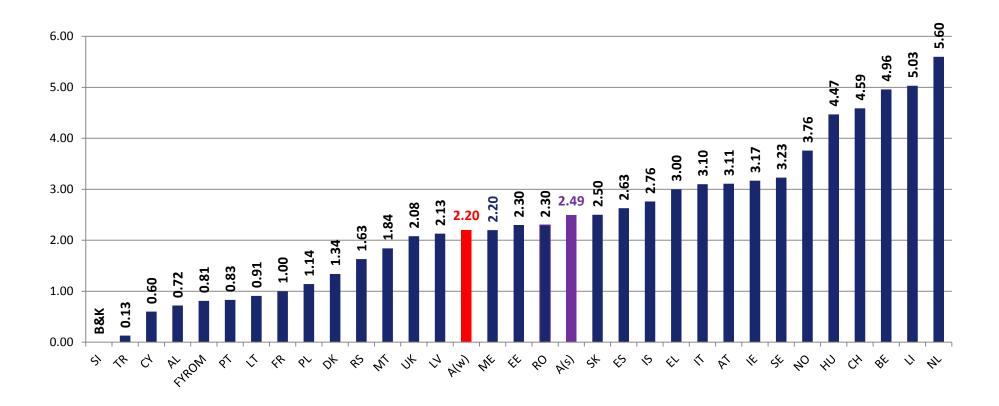
MTR per country – July 2016 (Euro cents per minute of service)

Figure 2 MTR



SMS TR per country – July 2016 (Euro cent per message)

Figure 3 SMS TR



2. Fixed networks - voice interconnection

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

- 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 incumbents' networks, called layers. Even though some peculiarities in specific countries are present, in general three main layers for interconnection are defined: i) layer 1⁴, 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). Due to increasing symmetry and decreasing relevance of layers the report features a ranking of the lowest regulated rates as well as a weighted average of peak and off-peak rates in the table of Annex 1.

The "lowest regulated rate" refers to the lowest of the rates of an operator. For operators that have more than one regulated rate, these are ranked in ascending order (first lowest, second lowest, etc.) If there is a single regulated rate, it is considered as "the lowest regulated rate".

2.1. Assumptions made for benchmarking

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

- In order to obtain a homogeneous comparison of average prices per minute across operators, a 3-minute average call duration has been assumed, using the standard formula: (fixed set-up charge + price per minute*3)/3.
- Nominal tariffs are reported only when the NRA has set out the maximum price per minute that operators may charge each other.

⁴ Layer 1 is defined as the closest possible interconnection level to the network termination point.

 For those countries which have not set a single tariff and which apply distinct rates for the peak/off-peak period, an average price has been calculated taking into account the traffic distribution between peak and off-peak time. When this distribution has not been made available, a 50/50 distribution has been assumed.

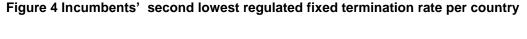
2.2. FTR benchmark

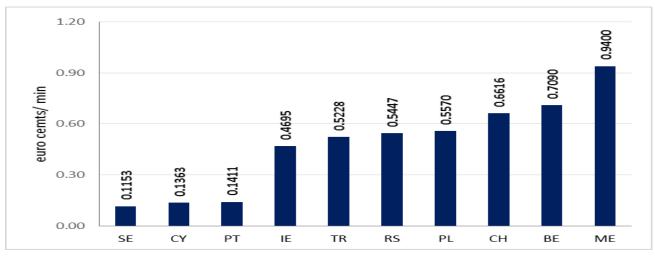
In Annex 1 the interconnection prices of operators listed by countries are presented. For each country, the NRA has provided information on the incumbent and some alternative or cable operators offering interconnection services. In the last column a weighted average of peak/off-peak prices is provided.

The lowest regulated rate is the rate applied by the operator at the level of interconnection that is closest to the network termination point. The second and third lowest regulated rates apply only to operators that have more than one regulated rate/interconnection layer.

Incumbents' fixed termination rates per lowest regulated rate and country

For more information on the individual lowest rates of respective incumbents, please refer to Figure 1 and respectively Annex 1.





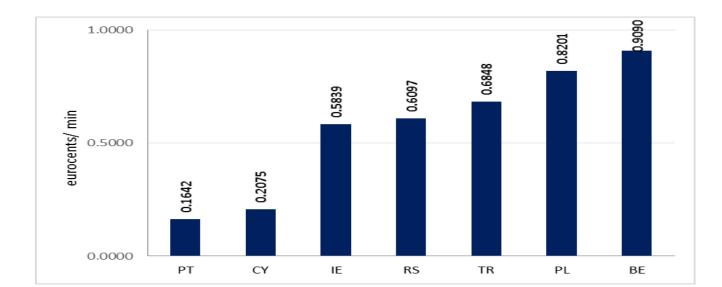


Figure 5 Incumbents' third lowest regulated fixed termination rate per country

2.3. Average fixed termination revenue per minute per country

In the next graph (Figure 6) the average revenue per minute from interconnection services across all Layers and for all operators is reported, together with the simple average (horizontal line). The data refer to the entire year of 2015, unless otherwise stated in the notes. Note that the average revenues per minute provided are aggregated for each country to: 1) the different existing layers of interconnection, 2) the different operators (i.e., incumbents and the rest), and 3) the different prices deriving from the peak /off-peak differentiation in a number of countries.

The comparison across countries of this average revenue per minute 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.

For more details please consult Annex 2.

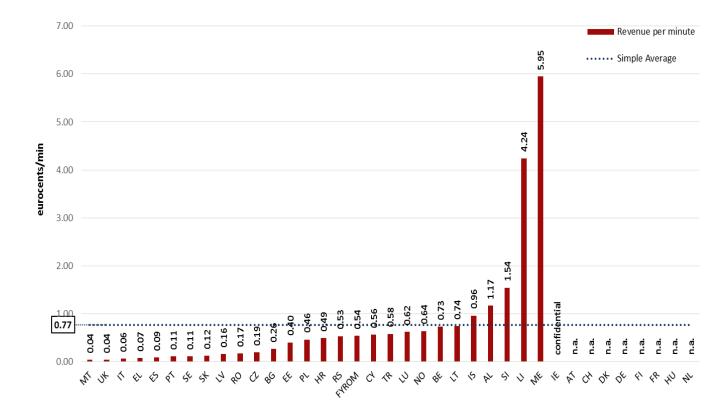


Figure 6 Average wholesale termination revenues per country (eurocent/min)

2.4. FTR regulatory model implemented and symmetry overview

20 of the NRAs use Pure BULRIC models to set FTRs. The second most common model is FDC/FAC, used by 7 NRAs. 4 NRAs reported using LRAIC+ models and 6 NRAs use Benchmarking approaches consistent with the EC's TRs Recommendation.

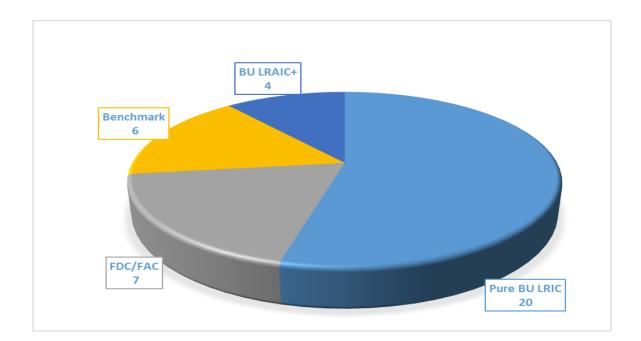


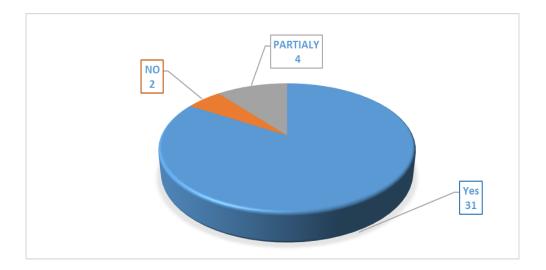
Figure 7 Cost accounting models used by NRAs

For more information consult Annex 3.

The European Commission Recommendation of 7 May 2009 on the Regulatory Treatment of Fixed and Mobile Rates in the EU states, NRAs should set termination rates based on the costs incurred by an efficient operator. This implies that they would also be symmetric. The above figure shows compliance with the recommendation in case of 20 NRAs using Pure BU LRIC models and another 6 NRAs using benchmarking as an alternative methodology not exceeding the average of the termination rates set by NRAs implementing the recommended cost methodology (Benchmarking based on PURE BU-LRIC).

Furthermore, in most of the respondent countries (31), FTRs are symmetric across all operators. 4 of the NRAs reported partial symmetry while prices are not symmetric only in 2 of the reporting countries.

Figure 8 FTRs Symmetry



For more information consult Annex 4.

2.5. Number of lines and market shares

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

3. Mobile networks - voice interconnection

This section presents the benchmark of mobile termination rates (MTR) with data as of 1 July 2016 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 future evolution of MTRs.⁵

The present overview of MTRs is based upon the results of a request for information sent to all NRAs in July 2016. It includes data from thirty-seven (37) NRAs that provided responses.

3.1. Assumptions made for the benchmarking

For the present benchmarking exercise the following assumptions have been made in order to make tariffs comparable⁶:

- Operators with a market share below 1.5% have been excluded from the national MTR average calculation.
- Only nominal tariffs are represented in the report, defining them as "the price (in Euro cent/minute) set out by the regulator that represents the maximum price per minute which operators may charge each other (without any adjustment for purchasing power parity or real effects – inflation)."
- Average MTRs per country have been obtained by weighting the MTR of each operator by its market share, measured in terms of subscribers. Four general averages have been calculated: a simple average and a weighted average, each at the European level (including all 37 countries reporting data) and at EU level (including only the 28 EU member states). The weighted averages weight each country's average rate with the share of the country's subscribers (total subscribers per country / total subscribers in all countries).

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⁵ See Annex 8 – Table 8

⁶ Generally speaking, these assumptions may create margins of error in the present comparison, making it difficult to draw valid conclusions for policy purposes.

- Regarding the number of subscribers, it must be considered that different estimation methods are used among European countries (especially in the case of pre-paid consumers).
- VAT is not included in the revenues.
- For non-Euro countries, the average exchange rate for the fourth quarter of the year (Q2 2016) was used to convert the currencies. The exchange rates used are reported in Annex 10.

Regarding the short-term MTR evolution (from January 2016 to July 2016), 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 countries⁷;
- iii. Changes in operators' market shares (e. g. due to a change in methodology in the calculation of subscriber rates) may have an effect on the average MTR for an individual country;
- iv. Inclusion of new operators that were not present in the previous benchmarks;

3.2. Average MTR per country: rates per voice minute (as of July 2016)

Table 1 - Average MTR per country⁸

	Average MTR per country	
	(€cent)	
AL	1.0699	
AT	0.8049	
BE	1.1800	
BG	0.9715	
СН	5.9232	
CY	1.0112	
CZ	0.9985	
DE	1.6600	
DK	0.7272	
EE	0.9200	

⁷ This only affects short-term MTR evolution (figure 13) because the percentage of tariff variation in each country (figure 14) has been calculated by comparing rates expressed in terms of the national currency.

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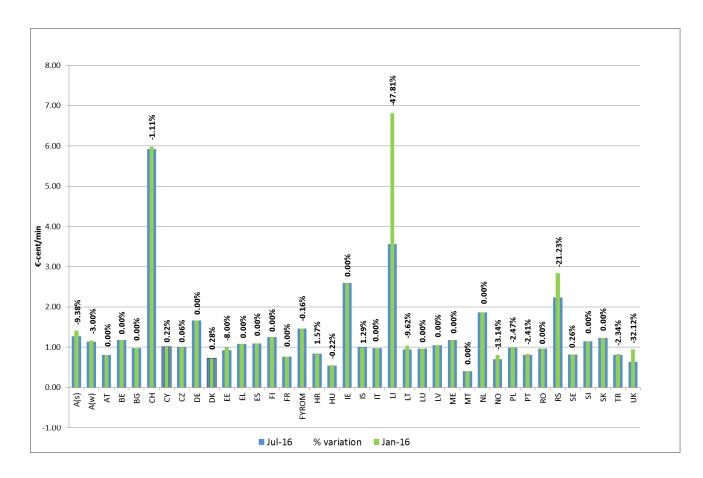
⁸ For comparison: the averages excluding Albania would be: Average(W) 1.1313, average(S) 1.2800

EL	1.0810
ES	1.0900
FI	1.2500
FR	0.7600
HR	0.8395
HU	0.5457
IE	2.6000
IS	1.0032
IT	0.9800
LI	3.5581
LT	0.9400
LU	0.9700
LV	1.0500
ME	1.1800
FYROM	1.4588
MT	0.4045
NL	1.8610
NO	0.6976
PL	0.9814
PT	0.8100
RO	0.9600
RS	2.2357
SE	0.8159
SI	1.1400
SK	1.2260
TR	0.8064
UK 0.6393	
Average(S)	1.2743
Average (W)	1.1358
AverageEU28(S)	1.0435
AverageEU28 (W)	1.0836

Figures 9 and 10 show the short term variations of MTRs in Euro cent and in national currency. These two figures illustrate the effect of the exchange rate on the short term evolution.

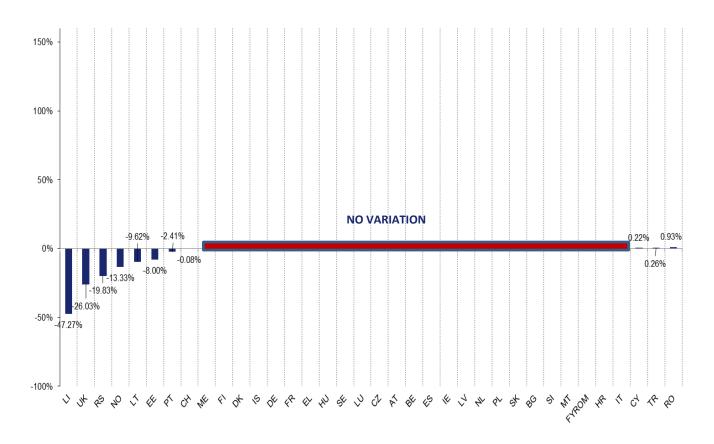
Variation of MTRs per country (from January 2016 to July 2016)

Figure 9 Variation in Euro cent and %



Percentage variation of average MTRs in <u>national currency</u> per country (from January 2016 to July 2016)

Figure 10 Variation in national currency (%)



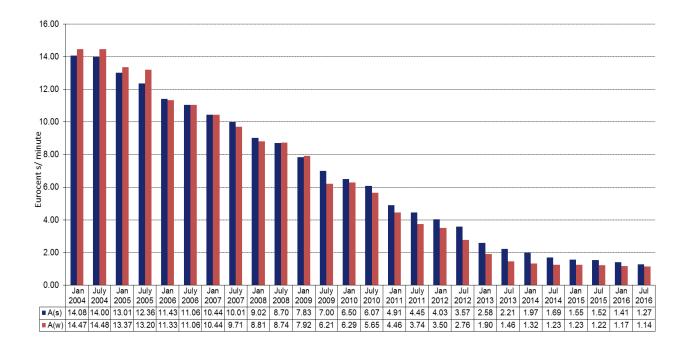
3.3. Average MTR per operator

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

For further details see Annex 6.

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

Figure 11 Evolution of simple A(s) and weighted A(w) averages



Note to figure 11: 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.

Figures 12 and 13 show the cumulative declines of the simple and the weighted average of European MTRs since 2004.

Considering the number of countries and operators included over the years, the simple average MTRs dropped by more than 90% since January 2004, from 14.08 euro cents to 1.27 euro cents in July 2016. When weighted, European MTRs average have declined even more, by around 92 % since 2004.

Figure 12 European MTRs simple average cumulative decline

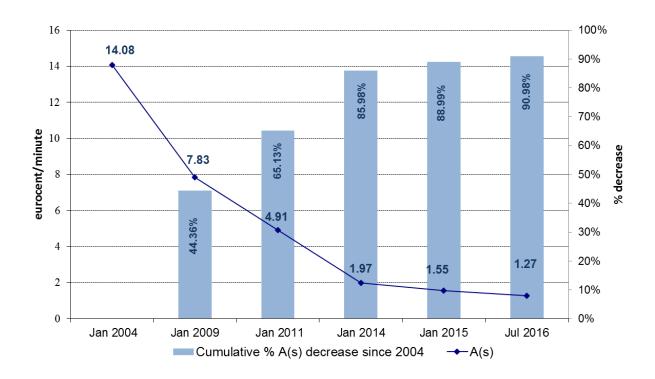
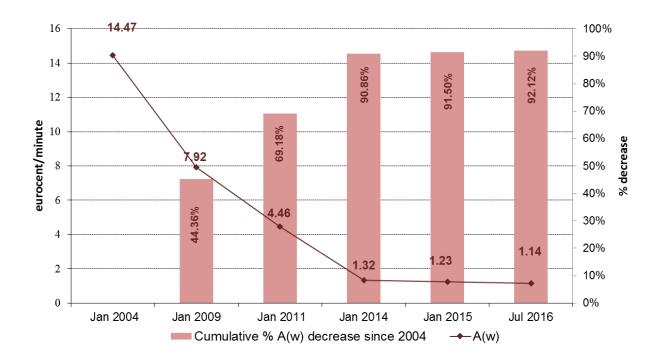


Figure 13 European MTRs weighted average cumulative decline



3.5. Average mobile termination revenue per minute per country

The average wholesale termination revenue per minute is obtained as a ratio of total revenues from termination of voice services divided by the total number of minutes of termination provided by the operators. The data refer to the entire year of 2015, unless otherwise stated in the notes.

Some countries do not collect information about termination revenues or treat this data as confidential. Those countries are not included in the figure.

8.00

6.87

6.44 6.49

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1.00

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Figure 14 Average wholesale termination revenues per country (euro cent/min)

Notes to figure 14 see Annex 7.

3.6. Regulatory model implemented and glide paths for MTRs

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

Cost accounting models used

Other 3

Benchmarking BU-LRIC

BU LRAIC + 4

BU LRIC 21

Figure 15 Cost accounting models used by NRAs

For further details see Annex 8.

4. Mobile networks - SMS interconnection

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

The present SMS benchmark report bases its results on the data provided by NRAs as of July 2016. Thirty-seven (37) 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 considered⁹).

4.1. Assumptions made for benchmarking

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

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

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

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

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⁹ 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.

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

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

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

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

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

4.2. Average SMS TR per country and per message (as of July 2016)

Table 2 - Average SMS TR per country¹⁰

Country	Average SMS TR per country (€cent)	
AL	0.73	
AT	3.11	
BE	4.96	
BG	confidential	
СН	4.59	
CY	0.60	
CZ	Confidential	
DE	n.a.	
DK	1.34	
EE	2.30	

¹⁰ For comparison: the averages excluding Albania would be: Average(W) 2.22, average(S) 2,55

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EL	3.00	
ES	2.63	
FI	confidential	
FR	1.00	
HR	n.a.	
HU	4.47	
IE	3.17	
IS	2.76	
IT	3.10	
LI	5.03	
LT	0.91	
LU	n/a	
LV	2.13	
ME	2.20	
FYROM	0.81	
MT	1.84	
NL	5.60	
NO	3.76	
PL	1.14	
PT	0.83	
RO	2.30	
RS	1.63	
SE	3.23	
SI	Bill & keep	
SK	2.50	
TR	0.13	
UK	2.08	
Average(W)	2.20	
Average(S)	2.49	

4.3. Volumes of SMS sent (2015)

Figure 16 is based on the time series of the countries from which information was available from 2002 to 2015. These countries are: Austria, Belgium, Croatia, Cyprus, Czech Republic,

Denmark, Estonia, Finland, France, Germany, Greece, Iceland, Ireland, Italy, Lithuania, Malta, Norway, Poland, Portugal, Romania, Slovak Republic, Spain, Sweden, Switzerland and UK.

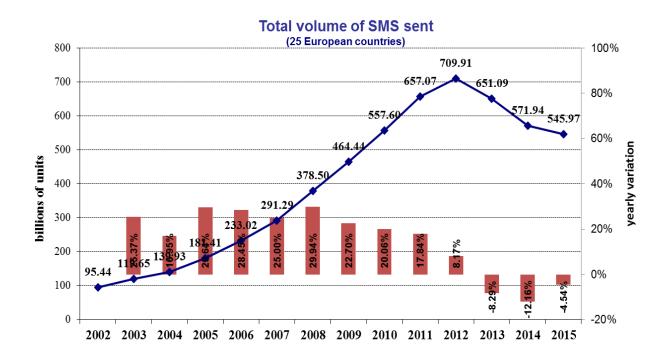


Figure 16 Volumes of SMS sent¹¹

4.4. Interpersonal SMS per subscriber

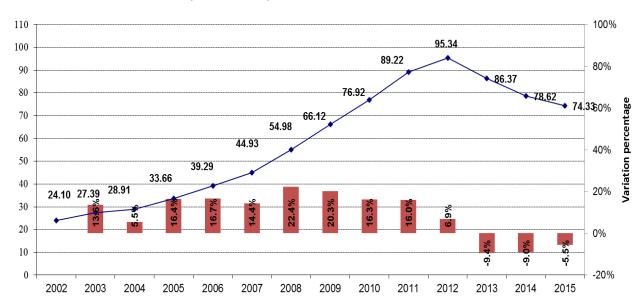
Since SMS volume growth has two components (the development of usage, i.e. the change in consumer consumption and a variation in the number of subscribers), it is worth describing the SMS usage through the average number of SMS per subscriber per month for each country (and its variation in time).

Figure 17 describes the trend from 2002 on for the same 25 countries as in figure 16. For a given year, the weighted average is obtained through pondering the average number of interpersonal SMS per subscriber per month of each country by its relative part of total subscribers (used in the panel of countries).

¹¹ Differences compared to the figures in previous reports are due to the change in the methodology concerning the calculation of subscriber numbers in various countries.

Figure 17 SMS per subscriber per month

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



Annex

Annex 1 Fixed termination rates as of 1 July 2016

Table 3

Country	Operator	Lowest Regulated Rate	WA in Cents
AL	Albtelecom	Single rate	1.0699
	Abcom	Single rate	1.0699
	Nisatel	Single rate	1.0699
	Albanian Satellite Communications	Single rate	1.0699
	Other operators	Single rate	1.0699
AT	Telekom Austria	Single rate	0.1110
^1	Other operators	Single rate	0.1110
		1 st lowest	0.5020
	Proximus	2 nd lowest	0.7090
BE		3 rd lowest	0.9090
	Other energies	1 st lowest	0.7090
	Other operators	2 nd lowest	0.9090
	Dulancian Talanamanning tion Commons	Single rate	0.2556
	Bulgarian Telecommunication Company	Single rate	0.2556
BG	Telenor Bulgaria	Single rate	0.2556
	Mobiltel	Single rate	0.2556
	Blizoo Media and Broadband	Single rate	0.2556
СН	Swisscom	1 st lowest	0.5483
OII		2 nd lowest	0.6616
	СҮТА	1 st lowest	0.1033
		2 nd lowest	0.1363
CY		3 rd lowest	0.2075
	PRIMETEL	Single rate	0.1363
	CABLENET	Single rate	0.1363
	MTN FIXED	Single rate	0.1363
	Česká telekomunikační infrastruktura a.s.	Single rate	0.1109
	UPC Česká republika, s.r.o.	Single rate	0.1109
CZ	T-Mobile Czech Republic a.s.	Single rate	0.1109
	Vodafone Czech Republic a.s.	Single rate	0.1109
	České Radiokomunikace a.s.	Single rate	0.1109
	IPEX a.s.	Single rate	0.1109
DE	Telekom Deutschland GmbH	Single rate	0.2400
DK	TDC	Single rate	0.0556
EE	Eesti Telekom	Single rate	0.0970
		Single rate	0.0970

	01	Single rate	0.0070
	Starman Elisa	Single rate Single rate	0.0970 0.0970
	STV	Single rate	0.0970
		Single rate	
	OTE	•	0.0665
EL	Forthnet	Single rate	0.0665
	HOL/VODAFONE	Single rate Single rate	0.0665
	WIND	Single rate Single rate	0.0665
	Other operators	Single rate	0.0665
	Telefónica de España	-	0.0817
ES	Orange - Jazztel	Single rate	0.0817
	Vodafone - Ono	Single rate	0.0817
	Other operators	Single rate	0.0817
	DNA Oyj	Single rate	2.8000
	Elisa Oyj	Single rate	2.8000
FI	TeliaSonera Finland Oyj	Single rate	2.8000
	Other operators (weighted average)	average	2.9860
	Weighted average of all operators	average	2.8300
FR	Orange	Single rate	0.0780
FK	Other operators	Single rate	0.0780
	HT	Single rate	0.0668
HR	Optima Telekom	Single rate	0.0691
	VIPnet	Single rate	0.0676
	H1 Telekom	Single rate	0.0731
	Magyar Telekom	Single rate	0.1277
HU	Invitel	Single rate	0.1277
по	UPC	Single rate	0.1277
	Other operators	Single rate	0.1277
		1st lowest	0.0675
ΙE	Eircom	2 nd lowest	0.4695
		3 rd lowest	0.5839
IS	Siminn	Single rate	0.1146
	Vodafone	Single rate	0.1146
	TIM	Single rate	0.0430
ΙΤ	Wind	Single rate	0.0430
"	Fastweb	Single rate	0.0430
	Vodafone	Single rate	0.0430
LI	Telecom Liechtenstein AG	Single rate	3.5581
	TEO LT AB	Single rate	0.1300
LT	UAB CSC Telecom	Single rate	0.1300
	AB Lietuvos gelezinkeliai	Single rate	0.1300
,	EPT	Single rate	0.1400
LU	Other operators	Single rate	0.1400
	Lattelecom	Single rate	0.1037
	Latvijas Mobilais Telefons	Single rate	0.1037
LV	Baltcom	Single rate	0.1037
Lv			
	Telekom Baltija	Single rate	0.1037
	Other operators	Single rate	0.1037
ME	Crnogorski Telekom	1 st lowest	0.7400

		2 nd lowest	0.9400
	Mtel	Single rate	0.9400
		Single rate	
FYROM	Makedonski Telekom AD	<u>-</u>	0.5835 0.5835
	ONE Telecom services	Single rate	
	Robi	Single rate	0.5835
	Blizoo	Single rate	0.5835
	Other operators	Single rate	0.5835
	GO plc	Single rate	0.0443
	Melita plc	Single rate	0.0443
MT	Vodafone	Single rate	0.0443
	Ozone	Single rate	0.0443
	SIS	Single rate	0.0443
	Vanilla	Single rate	0.0443
	KPN	Single rate	0.3020
NL	Ziggo	Single rate	0.3020
	Tele2	Single rate	0.3020
	Telenor	Single rate	0.0644
	NextGen Tel	Single rate	0.0644
NO	Get	Single rate	0.0644
	Phonect	Single rate	0.0644
	Phonero	Single rate	0.0644
		1st lowest	0.4690
	Orange Polska S.A.	2 nd lowest	0.5570
		3 rd lowest	0.8201
PL	Netia	Single rate	0.6245
	Multimedia Polska S.A.	Single rate	0.6245
	Multimedia Polska Poludnie S.A.	Single rate	0.6245
		1 st lowest	0.1026
	MEO	2 nd lowest	0.1411
		3 rd lowest	0.1642
PT	NOS Group	Single rate	0.1114
	Vodafone	Single rate	0.1114
		Single rate	
	ONI/Cabovisão		0.1114
RO	Telekom RC S.A. (former Romtelecom) Other operators	Single rate Single rate	0.1400 0.1400
	Other operators	1 st lowest	0.4634
	Telekom Srbija	2 rd lowest	0.5447
	reiekom orbija	3 th lowest	0.6097
RS	Orion telekom	Single rate	0.5040
	Telenor	Single rate	0.5040
	SBB	Single rate	0.5040
	JDD	1 st lowest	0.0711
SE	TeliaSonera		
		2 nd lowest	0.1153
SI	Telekom Slovenije	Single rate	0.0876
	Telemach ————————————————————————————————————	Single rate	0.0876
	T-2	Single rate	0.0876
	Si.mobil	Single rate	0.0876
	Other operators	Single rate	0.0876

SK	Slovak Telekom a.s.	Single rate	0.1234
	Orange Slovensko a.s.	Single rate	0.1234
	UPC BROADBAND SLOVAKIA s.r.o.	Single rate	0.1234
	Swan a.s.	Single rate	0.1234
		1st lowest	0.4250
TR	Türk Telekom	2 nd lowest	0.5228
IK		3 rd lowest	0.6848
	Other operators	Single rate	0.9783
	BT	Single rate	0.0445
	TalkTalk	Single rate	0.0445
UK	Sky	Single rate	0.0445
UK	Virgin Media	Single rate	0.0445
	Vodafone	Single rate	0.0445
	Other operators	Single rate	0.0445

Notes to Table 3

Incumbents per country are indicated first.

AL: The termination tariff on 01/01/2018 is the average (benchmark) of BEREC country that apply in one Layer and the average of three Layers in EU country, based on 01.01.2014.

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

Average FTRs are not based on actual data (i.e. revenues/volumes) as no data is available for each layer. Rather, the 'average FTR' per minute per Layer is calculated by de-averaging the setup/conveyance and peak/off-peak tariffs (peak/off-peak gradient is 1.22/0.64 and the setup amounts to 16% of the total cost of a 3.2 minute call). Current (2016) rates are based on de-averaging setup/conveyance and peak/off-peak (see remark in previous spreadsheets) - therefore these are not actual FTRs. Meanwhile, a new decision has been taken based on BULRIC rates, with no setup component nor peak/off peak differentiation. The Pure BULRIC tariffs of the new decision will enter in force on 01/11/2016.

BG: The incumbent' core network is conditionally divided into two logical hierarchy levels: referring to regional and national coverage. The segmentation of the network is based on geographical codes served by the media gateways in the network and is used only for routing and traffic management purposes although the incumbent's core network is also all-IP flat-hierarchy network. For interconnection with other nation-wide networks there's a requirement for setting a minimum of 3 Pols (at layer 2 according to your definition). Local and regional networks can be interconnected to the incumbent's network by one Pol (at Layer 1 according to your definition). Due to this we cannot define the reference interconnection levels in Table 1.2 above according to your requirements and definitions. The applied fixed termination rate is cost-oriented based on Pure Bu-LRIC model: 0,005 BGN/minute and there is no differentiation between peak/off-peak or hierarchy levels. There are no hierarchical levels defined by all other alternative operators.

CH: The prices indicated are taken from the Swisscom price manual for TDM-Interconnection. For IP-Interconnection the same prices as the ones for regional TDM-interconnection (layer 2) apply. Furthermore, there exists a "clause of reciprocity", meaning that the tariffs of other operators have to be same as the ones of Swisscom.

CY: Only one rate applies. There is no separation of rates to peak and off-peak. CYTA uses layer 1 interconnection for local and regional coverage and layer 2 for national coverage. Alternative operators use layer 2 interconnection.

EL: Note that: (a) Layer 1 (i.e., the closest possible interconnection level to the network termination point) is from subscriber to tandem. (b) Since 1/1/2014 there is no distinction between peak and off peak FTRs.

FI: The FTR average for the Other operators (combined market share 23 %) is a weighted average as of 1.1.2016.

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

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

IT: AGCOM does not distinguish between national and local FTR.

LI: Telecom Liechtenstein AG does not use differentiated Peak/Off-peak FTRs.

LT: Data as of Q1 2016.

LU: Data are valid as of 31/12/2015. 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).

MT: Data reflect the position as at Q1 2016.

NL: The rate imposed is based on court decision. For more information see note to Table 4.

PT: Termination price is charged on a per second basis from the first second. There is no differentiation on prices concerning peak and off peak hours. Current prices are in place as 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. In this context a draft decision was approved which foresees the application of a maximum termination price based on the results of the pure LRIC cost model. As such the maximum price will decrease from 0,1114 to 0,0644 euro cents per minute.

SK: Operators do not differentiate between peak and off-peak traffic.

TK: no peak off-peak differentiation in place.

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 rates, which are presumed to be symmetric to BT.

Annex 2 Average fixed termination revenue per minute per country

Notes

AT: No differentiation in national/regional/local. Billed minutes are not available (only total minutes including internal sales).

BE: termination to geo numbers.

BG: Data filled in the table refers to year 2015. The traffic that is outside of the regulation is not included in the questionnaire.

In 2015 the cost-oriented fixed terminating rates based on Pure Bu-LRIC model are into force – 0,005 BGN/minute. No FTRs differentiation between peak/off-peak or interconnection levels.

CZ: Provided data include only national traffic.

EL: Data are for the first half of 2015.

HR: In Croatia, HT has only one interconnection level (regional), however, this doesn't mean that some operators can't be interconnected on national level but this will be subject to commercial agreements between operators.

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

LU: National and international (EU and non-EU) termination traffic on fixed networks in Luxembourg.

ME: Data for National FTR are for calls originated from national (fixed and mobile) operators and from abroad. FTR for calls that are originated from abroad are not regulated, and different from FTR for calls that originated from national operators.

PT: Estimated values.

RS: Data provided are for 2015 and includes only national fixed-to-fixed and mobile-to-fixed calls. Revenue and traffic do not include self-supply and do not include calls when both the the fixed and the mobile network are owned and run by the same operator. Local FTR include minutes and revenue for layer 1 Local and layer 1 National.

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

TR: This table is filled according to the data of fixed incumbent operator (Türk Telekom). Total FTR minutes includes only calls that originates and terminates within Turkey regardless of the origin of call. In the table above total FTR revenues and total FTR minutes include data of the year 2015. FTRs for different level of layers have been same since 01.04.2010. Please note that Total FTR revenue and Total FTR minutes are confidential and they should not be published.

Annex 3 FTR regulatory model implemented

Table 4

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

Notes to Table 4

AL: According the market analysis of fixed telephony on October 2015, AKEP have approved the following Glide Path:

01.01.2016 1.08 Eurocent

01.01.2017 0.79 EuroCent

01.01.2018 0.51 EuroCent.

BE: The principle of setting Pure BULRIC FTRs dates back from our last FTR market analysis (March, 2nd, 2012), however the cost model was not readily available so BIPT engaged to set Pure BULRIC FTRs in a separate decision. This draft decisions has been notified to the EC on June ,18th 2016. A final decision has been taken on August, 25th 2016, Pure BULRIC FTR rates will apply as of 01/11/2016.

BG: With Decision 134 from 14 February 2013 CRC approved cost-oriented fixed terminating rates based on 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.

CH: Source of the Swisscom-Tariffs: https://www.swisscom.ch/dam/swisscom/de/ws/documents/D_IC-Dokumente/voip-lc-Dokumente/voip-

ic/DE_Handbuch%20Preise_VoIP-IC_V1-1.pdf, p. 5.

CY: Until 31/12/2015 termination rates were 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). This year OCECPR is in the process to develop a BULRIC model. With the last market analysis which was concluded in July 2015 benchmarking has been set for the calculation of the new termination rates starting 1/1/2016. Only one rate applies. No separation of rates to peak and off-peak. No data exist per layer. CYTA uses layer 1 interconnection for local and regional coverage and layer 2 for national coverage. Alternative operators use layer 2 interconnection.

CZ: Calculation of FTR is based on pure BU-LRIC model. For purposes of FTR regulation CTU has determined one level of FTR without differentiation between peak and off-peak time or POI.

DE: No glide path regulation. FTR are valid from 01.12.2014 until 31.12.2016. The decision is preliminary and still subject to Phase II investigation.

EE: PURE BU LRIC based on EEA rates.

EL: A Pure BU LRIC model applies since 28/5/2014 as a result of EETT's decision 714/09/10-4-2014 (Official Gazette 1049/28-04-2014).

ES: From November 1st 2015 onwards, new regulation for FTR is applied. There is no differentiation between peak/off-peak, there is symmetry in tariffs and only local level is regulated.

HR: HAKOM is currently in the process of updating FTR cost model. Please note that FTRs are regulated only for the calls originated on A numbers belonging to the EU/EEA operators and terminated into the individual fixed networks in Croatia.

IE: In relation to fixed termination for layer 1 (ie 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.

IT: AGCOM has developed a BU-LRIC model for determining IP termination rates, which has been applied from 1st July 2015.

IS: The country is a single interconnection area with one pricing structure and SINGLE TRANSIT. Cost model is Benchmark - Target rate in glide path based on historical cost reached 4.dec 2012. Benchmarked tariff for 2017 Notified to ESA - tariff for 2018 to be benchmarked in autumn 2017, decision 1.oct and ratified by ESA 1. nov

LI: FTR regulation is not finalized.

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

LT: Prices of termination on alternative fixed networks should not be higher than prices applied by TEO LT, AB at particular network level. No differentiation Peak/Off-peak FTR.

LU: 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).

LV: PURE BU LRIC countries.

ME: NRA in Montenegro does not apply any glide path for FTR. From the end **o**f 2015 we applied new FTR based on TD LRIC methodology for incumbent operator.

NL: ACM imposed maximum rates calculated on the basis of Pure BU - LRIC model, however, the court imposed maximum rates calculated on the basis of a BU LRAIC + model. The case is still pending.

PT: ANACOM has set the fixed termination rates by benchmarking against the BU pure LRIC prices in countries that had already applied those prices. The benchmark has therefore taken into account the prices established by the following countries: Denmark; France; Ireland; Malta; Bulgaria; Austria and Slovakia.

These prices are in place as 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 EUR 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 eurocents.

RO: For Telekom RC S.A. (former Romtelecom S.A.) the 0.14eurocents/min FTR apply irrespective of the interconnection level. No glide path applied.

SK: RU has not used any glide path.

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

Annex 4 FTR symmetry

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

Table 5

Country	Symmetry	Comments		
AL	YES	For all fixed operators on 1 January 2016 fixed terminate rates are symmetric.		
AT	YES			
BE	YES			
BG	YES			
СН	YES	Symmetry is ensured on the basis of geographical coverage from a certain point of interconnection (e.g. regional termination is priced the same both ways regardless of actual network hierarchy). Symmetry is evaluated on the basis of average FTRs (i.e. pricing flexibility is left for operators).		
CY	YES	Yes, from 1.1.2016 the same regulated terminations rates apply for all providers.		
CZ	YES	There is only one FTR valid irrespective of time and place of interconnection.		
DK	YES	Same FTR apply to all 35 price regulated operators, cf. market decisions as of December 18, 2013.		
DE	YES	Tariffs are symmetrical because of an agreement between incumbent Telekom Deutschland and alternative fixed network operators to charge reciprocal tariffs.		
EE	YES	Same FTR applies for ten operators with SMP.		
EL	YES	Symmetry applies since 28 May 2014.		
ES	YES	The FTR is symmetrical 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 network, the interconnected operator should be connected at 21 Points of Interconnection, if TDM based interconnection is used. If the operator connects to less than these 21 Pol, then a transit for terminating at the other Pols should be paid. For IP interconnection the number of Pols for termination in incumbent operator is still pending of decision. For the termination in alternative operators, there is no remedy concerning the minimum number of Pols for FTR. It is subject to commercial negotiation, as it was in the past.		
FI	PARTIALLY	In Finland there are no price caps on FTRs. FTRs are symmetrical among most fixed operators.		
FR	YES			

HR	YES	Symmetry in fixed network is prescribed for all operators as of the 1 January 2013.
HU	YES	
IE	PARTIALLY	Please note that ComReg Decision D12/12 set fixed termination rates at layer one (ie ericom's primary). ComReg Decision D12/12 imposed symmetrical blended rate of 0.085 cent per minute for all SMP fixed operators from 1 July 2014. This blended FTR will reduce to 0.072 cent per minute from 1 July 2015. Please refer to Annex1 in ComReg Decision D12/12 at http://www.comreg.ie/_fileupload/publications/ComReg12125.pdf
IS	YES	
IT	YES	
u	NO	There is only one fixed network operator in Liechtenstein: Telecom Liechtenstein AG. National interconnecting partners are MNOs. Fixed net interconnection partners of Telecom Liechtenstein are regulated by other NRAs and are not obliged to apply Liechtenstein's FTR regulation.
LT	YES	FTRs of all fixed operators having SMP are symmetric, i.e. the FTRs are the same, irrespective of the number of customers, the difference in network topologies, level of interconnection and so on.
LU	PARTIALLY	A maximum price cap is defined by the regulation, but operators may implement the solution in their own way.
LV	YES	
ME	YES	Only incumbent operator have 2 layers of Interconnection. Concept of Symmetry is applied on National coverage of POI.
FYROM	YES	
МТ	YES	Due to national characteristics interconnection is at layer 1. The FTR charge applicable to all those operators having an SMP in the wholesale fixed termination market is on a symmetrical basis.
NL	YES	
NO	YES	
PL	YES	

РΤ	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 set at a level that, weighted with the traffic, the average price is 0,1114 eurocents. For the other SMP operators: Whenever the operator decides to offer 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. Whenever the operator decides to offer a simplified pricing structure with only one level of prices, the termination price may not exceed 0.1114 EUR cents per minute.
RO	YES	
RS	PARTIALLY	Operators have different network topologies and different number of levels of interconnection. Telekom Srbija (incumbent) have 3 levels of interconnection. Other operators have 1 level of interconnection.
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 (symmetry) with the cost oriented price of the incumbent.
SI	YES	It is based on national coverage of layer.
SK	YES	The operators offer non-discriminatory FTRs to all their interconnect partners without any exception.
TR	NO	
UK	YES	Termination is regulated only at the point of interconnection closest to the called customer. At this point, BT has rates set via a charge control. All other CPs' rates are required to be set on fair and reasonable terms, and it is presumed that this means rates should be symmetric with the charge controlled rates unless the CP can demonstrate why a higher rate is necessary and in the interests of consumers. Rates for regional and national level interconnection are not regulated.

Annex 5 Market shares

Table 6

	Operator	Number of lines	Total number of lines	Market shares
	Albtelecom	177,774		78.90%
Δ1	Abcom	14,290		6.30%
AL	Nisatel	5,389	225,189	2.40%
	Albanian Satellite Communications	5,230		2.30%
	Other operators	22,506		10.00%
AT	A1 Telekom Austria	2,259,617		62.71%
	Operator 2	505,571	3,603,061	14.03%
	Operator 3	208,504		5.79%
	Operator 4	190,353		5.28%
	Operator 5	90,068		2.50%
	Operator 6	53,204		1.48%
	Other operators	295,744		8.21%
BE	Proximus	N/A	N/A	N/A
DE	Other operators	N/A		N/A
BG	Bulgarian Telecommunication Company	Confidential		62.80%
	Telenor Bulgaria	Confidential		14.40%
	Mobiltel	Confidential	Confidential	12.70%
	Blizoo Media and Broadband	Confidential		8.70%
	Other operators	Confidential		1.40%
СН	Swisscom	N/A	N/A	N/A
	Other operators	N/A	N/A	N/A
	CYTA	251,565		77.46%
	PRIMETEL	37,065	324,771	11.41%
CY	CABLENET	25,805	324,771	7.95%
	MTN FIXED	9,348		2.88%
	Other operators	988.00		0.30%
	Česká telekomunikační infrastruktura a.s.	Confidential		46.50%
	UPC Česká republika s.r.o.	Confidential		8.50%
	T-Mobile Czech Republic a.s.	Confidential		7.40%
CZ	Vodafone Czech Republic a.s.	Confidential	Confidential	6.60%
	České radiokomunikace a.s.	Confidential		4.10%
	IPEX a.s.	Confidential		3.30%
	Other operators	Confidential		23.50%

		20,170,000		54.60%
	Telekom Deutschland	20,170,000		54.00 /6
	GmbH			
DE		16,770,000	36,940,000	45.40%
	Other operators			
	Other operators			
	TD 0	040.400		78.51%
DK	TDC	613,198	791,150	22.49%
	Other operators Eeeesti Telekom	177,952		84.50%
	Starman	310,980 13,159	368,028	3.60%
EE	Elisa Eesti	30,255		8.20%
	STV	13,634		3.70%
	OTE	2,698,735		56.90%
	FORTHNET	Confidential		Confidential
	HOL/ VODAFONE	Confidential	4,743,358	Confidential
	WIND	Confidential	4,743,358	Confidential
	VVIIND	Corindential		Connidential
EL				
	Other operators	Confidential		Confidential
	Telefónica de España	9,864,489		52.32%
ES	Vodafone - Ono	3,908,003	18,852,781	20.73%
	Orange - Jazztel	4,246,059		22.52%
	Other operators	834,230		4.40%
	DNA Oyj			13.50%
	Elisa Oyj			10.0070
FI		N/A	N/A	39.00%
	TeliaSonera Finland Oyj	14//	14/71	23.50%
	Other operators			
				24.00%
	Orange			
FR	Other operators	Confidential	36,674,098	Confidential
				2 0
	HT	Confidential		Confidential
HR	OPTIMA	Confidential	1,413,947	Confidential
	VIPnet	Confidential		Confidential
	H1	Confidential		Confidential
	Magyar Telekom	1,654,632		53.00%
HU	Invitel	404,321	3,123,000	12.90%
	UPC	533,409		17.10%
	Other operators	530,638		17.00%
IE	Eircom	867450	867450	100.00%
			l	1

				1
		22.222		20.700/
IS	Siminn	86,639	124,284	69.70%
	Vodafone	37,645		30.30%
	TIM	11,602,429		57.46%
	Wind	2,736,618		13.55%
IT	Fastweb	2,280,244	20,191,289	11.29%
	Vodafone	2,195,749		10.87%
	Other operators	1,376,249		6.82%
LI	Telecom Liechtenstein AG	17,098	17,098	100.00%
	TEO LT AB	464,122		91.10%
	UAB CSC Telecom	8,364	509,289	1.60%
LT	AB Lietuvos gelezinkeliai	5,424	303,203	1.10%
	Other operators	31,379		6.20%
	Lattelecom	255,058		71.90%
LV	Telekom Baltija	14,390		4.10%
	Baltcom	12,275	354,905	3.50%
	Latvijas Mobilais Telefons	26,750		7.50%
	Other operators	46,432		13.10%
	EPT	205,000	070 500	75.00%
LU	Other operators	68,500	273,500	25.00%
	Crnogorski Telekom	142,977		94.20%
NA E	Mtel	7,783	454.750	5.10%
ME	Telenor	719	151,759	0.50%
	Telemach	280		0.20%
	Makedonski Telekom AD	224,802		60.60%
	ONE Telecom services	54,283	371,003	14.60%
FYROM	Robi	46,650	07 1,000	12.60%
	Blizoo	25,591		6.90%
	Other operators	19,677		5.30%
	Go plc	151,122	229,974	65.71%
	Melita plc	77,602		33.74%
MT	Vodafone	286		0.12%
	Ozone	737		0.32%
	SIS	168		0.07%
	Vanilla	59		0.03%
NL	KPN 	3,531,480	6,889,560	51.26%
	Ziggo	2,599,400	. ,	37.73%

	Tele2	291,040		4.22%
	Other operators	467,640		6.80%
	Telenor	584,915		61.93%
	NextGen Tel	82,873	944,510	8.77%
NO	Get	56,396		5.97%
NO	TeliaSonera	39,023		4.13%
	Phonero	37,640		3.99%
	Other operators	143,663		15.21%
	Orange Polska S.A.	Confidential		Confidential
	Netia	Confidential	5,605,442	Confidential
PL	Multimedia Polska S.A.	Confidential	-,,	Confidential
· ·	Multimedia Polska Poludnie S.A.	Confidential		Confidential
	Other operators	Confidential		Confidential
	MEO	Confidential		48.30%
	NOS Group	Confidential		33.80%
PT	Vodafone	Confidential	Confidential	13.50%
	ONI/Cabovisão	Confidential		4.10%
	Other operators	Confidential		0.30%
	Telekom RC S.A.	Confidential		Confidential
<u> </u>	RCS&RDS S.A.	Confidential	4 000 454	Confidential
RO	UPC Romania S.R.L.	Confidential	4,232,151	Confidential
	VODAFONE ROMANIA S.A.	Confidential		Confidential
	Other operators	Confidential		Confidential
	Telekom Srbija	Confidential	2,770,462	92.81%
RS	Other operators	Confidential		7.19%
	TeliaSonera	2,708,600		69.10%
	Comhem	2,455,531		9.06%
SE	Telenor	199,025	3,554,665	5.60%
JL	TelaVox	121,730	3,334,003	3.42%
	Phonera	83,915		2.36%
	Other operators	372,250		10.47%
	Telekom Slovenije	Confidential		55.14%
	Telemach	Confidential	Confidential	21.05%
SI	T-2	Confidential		11.90%
	Si.mobil	Confidential		6.83%
	Other operators	Confidential		5.08%
	Slovak Telekom a.s.	Confidential		78.10%
SK	Orange Slovensko a.s.	Confidential	Confidential	8.00%
SK	Swan a.s.	Confidential		1.40%
	UPC BROADBAND SLOVAKIA s.r.o.	Confidential		6.20%

	Türk Telekom	8,480,983	11,248495	75.40%
	TTNET	1,487,124		13.20%
TR	Superonline	401,890		3.60%
	Turknet	224,571		2.00%
	Other Operators	653,927		5.80%
	BT	Confidential		Confidential
	TalkTalk	Confidential	33,559,047	Confidential
UK	Sky	Confidential		Confidential
	Virgin Media	Confidential		Confidential
	Vodafone	Confidential		Confidential
	Other operators	Confidential		Confidential

AL: In Albania we collect the number of fixed telephony subscribers that means, subscribers of fixed telephony who have used the service at least once in the last three months. In Albania, several main alternative operators provide prepaid fixed telephony services, and this affects the number of fixed telephony users reported.

BG: Data in the field "Number of lines (network termination points)" refers to the number of fixed telephone lines as of 1st of July 2016.

CY: Number of lines as at 31/12/2015.

DE: The number of lines is based on figures from 2015. Source: BNetzA Annual Report 2015.

DK: Number of lines as of 31/12/2015.

EL: Figures refer to active telephone access lines as at 31/12/2015. The wholesale line rental lines are included in the incumbent's (OTE) lines.

FR: Total number of lines by the end of Q1 2016.

HR: Data from Q1 2016.

IT: The numbers of lines are estimates.

LU: Data as of 01/07/2015.

MT: Data reflects position as at Q1 2016.

NO: Numbers of subscribers are provided as 01.01.2016. The total number of subscribers according to 1st of July 2016 will not be able before Q3 2016.

TR: The number of lines specified above table for alternative network operators includes the number of wholesale line rental and VoIP subscribers.

Annex 6 Average MTR per operator as of 1 July 2016

Table 7

Country	Operator	Average effective prices (€cent)	Subscribers	Country total subscribers	Market Share %
	Telekom Albania	1.0699	1,089,623		32.24%
	Vodafone Albania	1.0699	1,675,744		49.59%
AL	Albtelecom	1.0699	448,479	3,379,377	13.27%
	Plus Communication	1.0699	165,531		4.90%
	A1Telekom Austria	0.8049	5,440,700		40.15%
AT	T-Mobile Austria	0.8049	3,800,100	13,551,020	28.04%
	Hutchison Drei Austria	0.8049	3,704,900		27.34%
	Proximus (incl light MVNO)	1.1800	confidential		confidential
BE	Orange Belgium (incl	1.1800	confidential	12.938.176	confidential
	Telenet Group (incl light MVNO)	1.1800	confidential		confidential
	Mobiltel	0.9715	confidential		39.82%
BG	Telenor Bulgaria	0.9715	confidential	confidential	33.83%
	BTC	0.9715	confidential		26.33%
	Swisscom	5.4283	6,561,442	10,711,066	61.26%
CH	Sunrise	6.7056	2,413,228		22.53%
	Salt	6.7056	1,736,396		16.21%
	Cyta	0.9900	689,406	1,135,324	60.72%
CY	Primetel	1.3900	60,657		5.34%
	MTN	0.9900	376,504		33.16%
	T-Mobile Czech Republic a.s.	0.9985	confidential	confidential	38.99%
CZ	O2 Czech Republic a.s.	0.9985	confidential		30.79%
	Vodafone Czech Republic a.s.	0.9985	confidential		23.40%
	T-Mobile	1.6600	41,138,000		32.53%
DE	Vodafone	1.6600	41,890,000	126,445,000	33.13%
	Telefónica Germany GmbH & Co. OHG	1.6600	43,417,000	, ,	34.34%
	TDC	0.7272	3,083,416		36.36%
DV	Telia	0.7272	1,996,684	0.400.700	23.54%
DK	Telenor	0.7272	1,501,482	8,480,723	17.70%
	Hi3G	0.7272	1,154,432		13.61%
	Telia Eesti AS	0.9200	767,559		40.26%
EE	Elisa Eesti AS	0.9200	628,863	1,906,369	32.99%
	Tele2 Eesti AS	0.9200	509,947		26.75%
E.	Cosmote	1.0810	6,940,537	45.050.550	45.20%
EL	Vodafone	1.0810	5,388,793	15,353,553	35.10%

	Wind	1.0810	2,995,322		19.51%
	TME	1.0900	15,433,567		30.22%
	Vodafone	1.0900	12,792,054	51,067,770	25.05%
ES	Orange	1.0900	10,926,151	1	21.40%
	Xfera	1.0900	3,313,670	-	6.49%
	DNA	1.2500	2,491,000		26.22%
	Elisa	1.2500	3,686,000	9,502,000	38.79%
FI	TeliaSonera	1.2500	3,258,000	- 3,302,000	34.29%
	reliacontera	1.2300	3,236,000		34.29 /0
	Orange	0.7600	n.a.		n.a.
FR	SFR	0.7600	n.a.	00 000 075	n.a.
	Bouygues Telecom	0.7600	n.a.	69,332,275	n.a.
	Free Mobile	0.7600	n.a.		n.a.
	HT	0.8395	2,060,000		47.07%
HR	VIPnet	0.8395	1,549,550	4,376,398	35.41%
	Tele2	0.8395	766,848	1	17.52%
	T-Mobile	0.5457	confidential		confidential
HU	Telenor	0.5457	confidential	confidential	confidential
	Vodafone	0.5457	confidential	1	confidential
	Vodafone Ireland	2.6000	1,840,824		37.82%
	Meteor	2.6000	982,666	1	20.19%
IE	Three Ireland	2.6000	1,572,842	4,867,611	32.31%
	Tesco	2.6000	340,750	1	7.00%
	0	4 0000	4.45.400		0.4.070/
	Siminn	1.0032	145,126	425,966	34.07%
IS	Vodafone	1.0032	120,609		28.31%
	Nova	1.0032	145,734		34.21%
	365/Tal	1.0032	14,497		3.40%
	Telecom Italia S.p.A.	0.9800	29,845,763		30.83%
	Vodafone Omnitel N.V.	0.9800	27,990,314		28.91%
IT	Wind Telecomunicazioni	0.9800	21,922,137	96,802,548	22.65%
	S.p.A.			30,002,040	
	H3G S.p.A.	0.9800	10,082,000	1	10.42%
	Poste Mobile	0.9800	3,625,741]	3.75%
	Salt (Liechtenstein)		confidential		confidential
	AG			_	
LI	Swisscom (Schweiz)	3.5581	confidential	11,738	confidential
	AG		fi-l(i-l	-	a a mfi da mti a l
	Telecom Liechtenstein AG		confidential		confidential
	Tele2	0.9400	1,776,815		43.58%
LT	Omnitel	0.9400	1,262,237	4,077,167	30.96%
	Bite Lietuva	0.9400	1,038,115	-	25.46%
	Post Télécom	0.9700	438,000		49.12%
	Tango	0.9700	288,000	┥	32.30%
LU	Orange	0.9700	138,900	891,700	15.06%
	JOIN	0.9700	26,800	-	3.01%
	Latvijas Mobilais	1.0500	20,000		
LV	Telefons	1.0500	022 206	2,588,057	35.67%
	T GIGIOTIS		923,206		

	Tele2	1.0500	905,112		34.97%
	Bite Latvija	1.0500	494,711		19.12%
	Zetcom	1.0500	182,596		7.06%
	Telenor	1.1800	381,074		37.66%
ME	Crnogorski Telekom	1.1800	344,607	1,011,882	34.06%
	Mtel	1.1800	286,201		28.28%
	T Mobile Macedonia	1.4588	1,001,583		48.07%
FYROM	one.VIP	1.4588	1,082,000	2,083,583	51.93%
	Go plc	0.4045	216,605		38.69%
	Melita plc	0.4045	90,289		16.13%
MT	Vodafone	0.4045	242,696	559,830	43.35%
	Redtouch fone	0.4045	10,224		1.83%
	KPN	1.8610	6,727,000		32.22%
	Vodafone	1.8610	5,032,000		24.10%
NL	T-Mobile	1.8610	3,584,000	20,876,000	17.17%
	Tele2	1.8610	927,000		4.44%
	Telenor	0.6976	2,942,184		51.48%
	TeliaSonera	0.6976	2,131,539	5,714,890	37.30%
NO	Phonero	0.6976	204,542		3.58%
	Lyca	0.6976	108,628		1.90%
	Orange Polska S.A.	0.9814	confidential		confidential
	Polkomtel sp. z o.o.	0.9814	confidential	54,537,230	confidential
PL	P4 sp. z o.o.	0.9814	confidential		confidential
	T-Mobile Polska S.A.	0.9814	confidential		confidential
	MEO	0.8100	confidential		confidential
PT	VODAFONE	0.8100	confidential	16,859,476	confidential
	NOS	0.8100	confidential	, ,	confidential
	Vodafone Romania	0.9600	confidential		confidential
	S.A.				
RO	Orange Romania S.A.	0.9600	confidential	22,579,060	confidential
	TELEKOM RMC S.A.	0.9600	confidential		confidential
	RCS & RDS S.A.	0.9600	confidential		confidential
	MTS (Telekom Srbija)	2.2357	confidential	0.455.664	46.10%
RS	Telenor	2.2357	confidential	9,155,664	32.30%
	Vip mobile	2.2357	confidential		21.60%
	TeliaSonera	0.8159	5,284,601		35.65%
SE	Tele2	0.8159	4,051,145	14,823,000	27.33%
	Telenor	0.8159	2,548,298		17.19%
SI	Hi3G	0.8159	1,924,963		12.99%
	Telekom Slovenije	1.1400	confidential		50.32%
	Si.mobil	1.1400	confidential		30.50%
	Telemach	1.1400	confidential	confidential	15.41%
	T-2	1.1400	confidential		3.76%
SK	Orange Slovensko, a.s.	1.2260	confidential	6,003,784	confidential
O.K	Slovak Telekom, a.s.	1.2260	confidential		confidential

	O2 Slovakia, s.r.o.	1.2260	confidential		confidential
	Swan Mobile a.s.	1.2260	confidential		confidential
	Turkcell	0.7643	32,573,556		44.23%
TR	Vodafone	0.7888	23,044,383	73,650,996	31.29%
	Avea	0.9049	18,033,057		24.48%
	EE	0.6393	confidential		confidential
UK	Telefonica	0.6393	confidential	74 760 222	confidential
	Vodafone	0.6393	confidential	74,768,223	confidential
	H3G	0.6393	confidential		confidential

AL: MTRs of Plus Communication are subject of court appeal

BE: Subscribers = number of active simcards as of the 1st of January 2016, Prices are nominal prices.

BG:

Number of mobile voice subscribers (excl. data SIMs and M2M) as of 01.07.2016. Data includes number of post-paid and prepaid active mobile subscribers (number of post-paid active subscribers means number of subscribers with a valid contract; number of prepaid active subscribers means numbers of subscribers that have made or received a call, sent an SMS or MMS at least once in the last three months).

CZ: Regulated MTR is defined as a single price per minute. SIM cards filled in column "rest of operators" are MVNOs (Service Providers) with no MTR regulation - however, termination is carried out by their MNOs for regulated rates. Also we provide the total number of SIM cards as of 31st December 2015 - data for the 1st half of the year 2016 are not yet available.

DE: Current MTR are valid from 01.12.2015 until 30.11.2016. They are preliminary and still subject to phase II investigation.

Number of subscribers are as of 2nd quarter 2016 (Vodafone has changed the way of counting subscriber numbers in Q2, 2016).

DK: All prices are of 1st January 2016.

Subscribers for the operators Mundio and Lycamobile are not published as the number of subscribers are below the discretion limit of 5 % of the total market share.

The number of subscribers are as of 31.12.2015.

EL: Subscribers as of 31.12.2015 (datacards, M2M not included).

FI, PL, RS: Number of subscribers as of 31.12.2015.

IE: Subscribers based on Q1 2016 data excluding M2M and MBB.

Telefonica Ireland Limited subscriptions data is incorporated with Hutchison 3G Ireland Limited subscriptions data.

Please note that in December 2012 Vodafone issued appeal proceedings with respect to ComReg's MTR decision (http://www.comreg.ie/_fileupload/publications/ComReg12125.pdf (ComReg Document 12/125)). On 12 February 2016, ComReg published Decision 02/16 and the purpose being to implement MTRs in the Irish market that have been calculated using a BU pure LRIC methodology.

IS: MTR are now 1.4 ISK/min (no setup fee) and are expected to become 1.23 ISK/min on January 1, 2017 - Subscriber numbers for 1.7.2016 not yet available – data as of 31.12.2015

HR, LT, MT: Subscribers at Q1 2016.

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

FYROM, TR: Data as of Q3 2015

NO: Numbers of subscribers are provided as 01.01.2016. The total number of subscribers according to 1st of January 2016 will not be available before Q3 2016.

NL: The rate imposed is based on court decision. For more information see note to Table 8.

Annex 7 Average mobile termination revenue per minute per country

Notes to figure 14

AL: For the year 2015 the MTRs have been different for the smallest operator (Plus Communication). The three others were in symmetric.

BE: Limited to national terminating traffic

BG: Revenues from traffic originated from national fixed networks and terminated in mobile networks during 2015. Excluded are fixed-to-mobile calls when both the fixed and the mobile network are owned and run by the same operator.

Traffic originated in national fixed networks and terminated in mobiles networks during 2015. Excluded are fixed-to-mobile calls when both the fixed and the mobile network are owned and run by the same operator.

CH: The data refers to the whole year 2015.

DK: Price is as of 1st January 2016. There is no setup fee, thereby the average revenue per min is 6.02 (1/100 of national currency). There is no data for the total MTR revenue in Denmark.

EL: Data are for the first half of 2015.

HR: Data refer to the whole 2014.

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

HU: Data of 2014 are not yet available.

IT: Estimated data

LU: National and international (EU and non EU) termination at mobile networks in Luxembourg.

ME: Data are for calls originated from national operators (fixed and mobile) and from abroad. MTR for calls that are originated from abroad are not regulated, and different from MTR for call that are originated from national operators.

FYROM: Mobile to mobile and fixed to mobile revenue included

NO: The MTR was NOK 0.16 until 1, July 2015 and NOK 0,083 the rest of the year.

RS: Data provided are for the whole 2015 and includes only national fixed-to-mobile calls. Revenue and traffic do not include fixed-to-mobile calls when both the fixed and the mobile network are owned and run by the same operator.

SI: Including international termination. Self-supply is not included! MTR revenues and minutes include also traffic terminated on premium numbers, numbers for tele voting, mass calling, and short dialing numbers.

TR: Total MTR minutes includes only calls that originates and terminates within Turkey. In the table above total MTR revenues and total MTR minutes include data of the whole 2015.

Annex 8 Regulatory model implemented to calculate MTRs

Table 8

	cos	T ACCOUNTING I	MODEL		GLID	E PATH in €cen	t	
Jul-16	Model	Rate status	When a tariff adopted by a final decision and meeting the standards of the TR Recommendation has been or will be firstly applied?	Period 1 - From 01/07/2016 until 31/12/2016	Period 2 - From 01/01/2017 until 30/06/2017	Period 3 - From 01/07/2017 until 31/12/2017	Period 4 - From 01/01/2018 until 30/06/2018	Period 5 - From 01/07/2018 until 31/12/2018
AL	Benchmark BU-LRIC	adopted	10/02/2011	1.0699				
AT	Pure BU-LRIC	adopted		0.8049	0.8049			
BE	Pure BU-LRIC	adopted	01/01/2013	1.1800				
BG	Pure BU-LRIC	adopted	01/07/2013					
СН		Not regulated						
CY	Benchmark BU-LRIC	adopted		0.0099				
CZ	Pure BU-LRIC	adopted	01/07/2013					
DE	BU LRAIC+	notified		1.6600				
DK	Pure BU-LRIC	adopted		0.7272	0.7272			
EE	Benchmark BU-LRIC	adopted	01/01/2013	0.9200	0.9200			

EL	Pure BU-LRIC	adopted	01/01/2013	1.0810				
ES	Pure BU-LRIC	adopted	10/05/2012	1.0900	1.0900	1.0900	1.0900	1.0900
FI	other (FDC/FAC)	adopted		1.2500	1.2500	1.2500	1.2500	1.2500
FR	Pure BU-LRIC	adopted	01/01/2013	0.7600	0.7400	0.7400		
HR	Pure BU-LRIC	adopted		0.8395				
HU	Pure BU-LRIC	adopted	01/04/2015	0.5457	0.5457	0.5457	0.5457	not decided
IE	other	adopted	01/09/2016	2.6000	0.8200	0.8200	0.7900	0.7900
IS	Benchmark BU-LRIC	notified		1.0032	0.8813	0.8813		
IT	Pure BU-LRIC	adopted		0.9800	0.9800	0.9800		
LI	Benchmarking	adopted		3.5581	3.5581			
LT	Benchmark BU-LRIC	adopted	01/08/2014	0.9400				
LU	Pure BU-LRIC	adopted	01/04/2015	0.9700	0.9700			
LV	Benchmark BU-LRIC	adopted	01/07/2014	1.0500	1.0500			
ME	TD LRIC	adopted		1.1800				
MK	BU LRAIC+							
MT	Pure BU-LRIC	adopted	01/04/2014	0.4045	0.4045			
NL	BU LRAIC+							

NO	Pure BU-LRIC	adopted	01/07/2015	0.8049	0.6976	0.6976	0.6976	
PL	Pure BU-LRIC	adopted	01/07/2013	0.9814	0.9814	0.9814	0.9814	0.9814
PT	Pure BU-LRIC	adopted	31/12/2012	0.8100	0.8100			
RO	Pure BU-LRIC	adopted	01/04/2014	0.9600				
RS	Benchmarking			2.2357	1.6829			
SE	Pure BU-LRIC	adopted	01/07/2013	0.8159	0.7426	0.6930	0.6930	0.6294
SI	Pure BU-LRIC	adopted	01/09/2014	1.1400	1.1400	1.1400	1.1400	1.1400
SK	Pure BU-LRIC	adopted	01/08/2013	1.2260				
TR	BU LRAIC+							
UK	Pure BU-LRIC	adopted	01/04/2013	0.6393	0.6323			

BE: On 1 January 2013, the last step of the MTR glide path set by the Belgian regulator (BIPT) in June 2010 for the 2010-2013 period entered into force. Since 1 January 2013, MTRs in Belgium have been fully symmetric at a rate of 1.18 euro cents/min (incl. inflation). At present the BIPT reviews the analysis of the mobile termination market and the MTR cost model.

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

from 01/07/2013 - 0.023 BGN/minute

from 01/01/2014 - 0.020 BGN/minute

from 01/01/2015 - 0.019 BGN/minute

As of 01.07.2016 the applied tariff of 0.019 BGN/minute is according the cost-oriented mobile terminating rate based on PURE BU-LRIC model (Decision 135 from 14 February 2013). According to CRC's Decision № 357 from 23 June 2016 (due to third review of the market for wholesale voice call termination on individual mobile networks in Bulgaria) this tariff will be applied till the adoption of the updated BULRIC model which is currently in the process of public consultation (http://www.crc.bg/files/_bg/pril2_Reshenie_388_28072016_Bulric_Mob_FINAL.pdf).

CH: MTRs are not regulated.

CY: Note that OCECPR is currently finalizing the results of the pure BULRIC model. Once the results are finalized then they will be applied. Currently the regulated rates are based on a benchmark approach. The EU average of regulated rates based on pure LRIC.

DE: No glide path regulation. Current MTR are valid from 01.12.2015 until 30.11.2016. The decision is preliminary and still subject to phase II investigation.

EL: EETT is currently preparing the next market review. Until the adoption of the final measure (after the consultation and notification procedures) the price of 1,081 eurocent/min will be applied

ES: The final decision and meeting the standards of the TR Recommendation has been applied on 10th May 2012 but the MTR of the BULRIC model came into force on 1/7/2013.

FI: FICORA issued new decisions concerning significant market power in the mobile voice call termination markets on 10 August 2015. FICORA has, for the first time, set a cost-oriented maximum price for MTRs. The MTR 1.25 came into effect on 1th of December 2015. The cost-oriented maximum price for MTRs has been calculated based on FDC approach. Some of the operators have appealed to Supreme Administrative Court and the process is still going on.

FR: In period 3, the glide-path is only valid until 19/12/2017. Regulated MTRs after that date will be subject to next round of market analysis.

HR: HAKOM is currently in the process of updating MTR cost model. Please note that MRs are regulated only for the calls originated on A numbers belonging to the EU/EEA operators and terminated into the individual fixed networks in Croatia.

IE: On 12 February 2016, ComReg published Decision 02/16 and the purpose being to implement MTRs in the Irish market that have been calculated using a BU pure LRIC methodology.

IS: Benchmark against BU-LRIC made in august 2016 for validity in 2017. Notified 1.oct to ESA and ratified 1 November.

LI: Market analysis M7 and MTR decisions are available on: http://www.llv.li/#/111026/m Last step of glide path, effective since 1/1/2013: 0.0765 CHF/min (cap)

Benchmarking method: The weighted average of the termination rates in Switzerland, 0.0765 CHF per minute as of 1 January 2011, served as a reference value for setting the termination rates of the Liechtenstein mobile operators in the context of the M7 market analysis.

MTR as of May 1, 2016 is 3.9 CHF-cents per minute (Jan 1 until April 30, 2016: 7.65 CHF-cents)

LT: The rate was calculated and based on Benchmarking methodology in 2014. In the end of 2015 RRT finalized market research and calculated new rate, based on Benchmarking methodology, the rate is applied from 01/04/2016.

LV: Latvian NRA doesn't apply any glide path. MTRs should be revised next year.

NL: ACM imposed maximum rates calculated on the basis of Pure BU - LRIC model, however, the court imposed maximum rates calculated on the basis of a BU LRAIC + model. The case is still pending.

PT: In August 6, 2015 ANACOM approved a new decision establishing the new MTR also in accordance with the EC Recommendation on Termination rates - pure BU-LRIC.

From 01.07.2017 (and until June next year) the MTR will correspond to the values of the pure LRIC cost model adjusted in accordance with the inflation rate.

RS: Price of 2.07 RSD is effective from 01/01/2017, until new RATEL's decision.

SE: Note comment in Period 1, Decision on new MTR is planned to be taken during period 1 and be as in period 2 as of that date.

TR: ICTA does not regulate MTRs via glide path, in general MTRs are revised annually.

UK: Future rates are dependent on the level of inflation. For the above we have assumed an inflation rate of 2% per annum from 2012/13 to 2017/18. All prices are nominal.

Annex 9 SMS TR per operator as of 1 January 2016

Table 9

		SMS TF	R (€cent)	Subsc		
Country	Operator	per operator	WA per country	per operator	Total per country	Market share
	Telekom Albania	0.7229		1,089,623		32.24%
AL	Vodafone Albania	0.7229	0.7229	1,675,744		49.59%
AL	Albtelecom	0.7229	0.7229	448,479	3,379,377	13.27%
	Plus Communication	0.7229]	165,531		4.90%
	A1Telekom Austria	n.a.		5,440,700		40.15%
AT	T-Mobile Austria	n.a.	3.1100	3,800,100	13,551,020	28.04%
	Hutchison Drei Austria	n.a.		3,704,900		27.34%
	Proximus (incl light MVNO)	4.9600		confidential	12,938,176	confidential
BE	Orange Belgium (incl light MVNO)	4.9600	4.9600	confidential		confidential
	Telenet Group (incl light MVNO)	4.9600		confidential		confidential
	Mobiltel	confidential		confidential		39.82%
BG	Telenor Bulgaria	confidential	confidential	confidential	confidential	33.83%
	BTC	confidential	1	confidential		26.33%
	Swisscom	confidential		6,561,442		61.26%
СН	Sunrise	confidential	4.5943	2,413,228	10,711,066	22.53%
	Salt	confidential	1	1,736,396	7	16.21%
	Cyta	0.5500		689,406	İ	60.72%
CY	Primetel	0.7300	0.6045	60,657	1,135,324	5.34%
	MTN	0.6800		376,504		33.16%
CZ	T-Mobile Czech Republic a.s.	confidential	confidential	confidential	confidential	38.99%

	O2 Czech Republic a.s.	confidential		confidential	1 1	30.79%
	Vodafone Czech Republic a.s.	confidential		confidential		23.40%
	T-Mobile	n.a.		41,138,000		32.53%
DE	Vodafone	n.a.	n.a.	41,890,000	126,445,000	33.13%
	Telefónica Germany GmbH &	n.a.	il.a.	43,417,000		34.34%
	Co. OHG					
	TDC	1.3442		3,083,416		36.36%
DK	Telenor	1.3442		1,996,684	8,480,723	23.54%
	Telia	1.3442	1.3442	1,501,482	0,460,723	17.70%
	Hi3G	1.3442		1,154,432		13.61%
	Telia Eesti AS	2.6000		767,559		40.26%
EE	Elisa Eesti AS	2.1000	2.3013	628,863	1,906,369	32.99%
	Tele2 Eesti AS	2.1000		509,947		26.75%
	Cosmote	3.0000		6,940,537		45.20%
EL	Vodafone	3.0000	3.0000	5,388,793	15,353,553	35.10%
	Wind	3.0000		2,995,322		19.51%
	Movistar	confidential		15,433,567	51,067,770	30.22%
	Vodafone	confidential	2.6277	12,792,054		25.05%
ES	Orange	confidential	1	10,926,151	1	21.40%
	Yoigo	confidential		3,313,670	1	6.49%
	DNA			2,491,000		26.22%
FI	Elisa	confidential	confidential	3,686,000	9,502,000	38.79%
	TeliaSonera			3,258,000	1	34.29%
	Orange	1.0000		n.a.		n.a.
FR	SFR	1.0000	1.0000	n.a.	69,332,275	n.a.
— гк 	Bouygues Telecom	1.0000	1.0000	n.a.	09,332,273	n.a.
	Free Mobile	1.0000		n.a.	<u> </u>	n.a.
	HT	n.a		2,060,000		47.07%
HR	VIPnet	n.a.	n.a.	1,549,550	4,376,398	35.41%
	Tele2	n.a.		766,848		17.52%

	T-Mobile	4.4680		confidential		confidential
HU	Telenor	4.4680	4.4680	confidential	confidential	confidential
	Vodafone	4.4680		confidential		confidential
	Vodafone Ireland	3.1700		1,840,824		37.82%
IE	Meteor	3.1700	3.1700	982,666		20.19%
"-	Three Ireland	3.1700	3.1700	1,572,842	4,867,611	32.31%
	Tesco	3.1700		340,750		7.00%
	Siminn	2.7587		145,126		34.07%
IS	Vodafone	2.7587	2.7587	120,609	425.066	28.31%
15	Nova	2.7587	2./58/	145,734	425,966	34.21%
	365/Tal	2.7587		14,497		3.40%
	Telecom Italia	confidential		29,845,763		30.83%
	Vodafone Omnitel N.V.	confidential	3.1024	27,990,314	00 000 540	28.91%
	Wind Telecomunicazioni	confidential	3.1024	21,922,137	96,802,548	22.65%
ΙΤ	H3G S.p.A.	confidential		10,082,000		10.42%
	Poste Mobile	confidential		3,625,741		3.75%
	Salt (Liechtenstein) AG	confidential		confidential		confidential
LI	Swisscom (Schweiz) AG	confidential	5.0348	confidential	11,738	confidential
	Telecom Liechtenstein AG	confidential		confidential		confidential
	Tele2	0.7250		1,776,815		43.58%
LT	Omnitel	0.7250	0.9096	1,262,237	4,077,167	30.96%
	Bite Lietuva	1.4500		1,038,115		25.46%
	Post Télécom	n.a.		438,000		49.12%
LU	Tango	n.a.	n.a.	288,000		32.30%
	Orange	n.a.		138,900	891,700	15.06%

	JOIN	n.a.		26,800		3.01%
	Latvijas Mobilais Telefons	2.1300		923,206		35.67%
LV	Tele2	2.1300		905,112	2,588,057	34.97%
LV	Bite Latvija	2.1300	2.1300	494,711	1	19.12%
	Zetcom	2.1300		182,596	7	7.06%
	Telenor	2.2000		381,074		37.66%
ME	Crnogorski Telekom	2.2000	2.2000	344,607	1,011,882	34.06%
	Mtel	2.2000		286,201	7	28.28%
	T Mobile Macedonia	0.8118		1,001,583		48.07%
FYROM	one.VIP	0.8118	0.8118	1,082,000	2,083,583	51.93%
	GoMobile	1.6531	4.0400	216,605		38.69%
MT	Melita Mobile	1.6592	1.8403	90,289	559,830	16.13%
	Vodafone	2.0746		242,696		43.35%
	KPN	5.6000	5 0000	6,727,000	20,876,000	32.22%
NL	Vodafone	5.6000	5.6000	5,032,000		24.10%
	T-Mobile	5.6000		3,584,000		17.17%
	Tele2	5.6000		927,000		4.44%
	Telenor	3.7563		2,942,184		51.48%
NO	TeliaSonera	3.7563	3.7563	2,131,539		37.30%
NO	Lyca	3.7563	3.7503	204,542	5,714,890	3.58%
	Phonero	3.7563		108,628		1.90%
	Orange Polska S.A.	1.1438		confidential		confidential
PL	Polkomtel sp. z o.o.	1.1438	1.1438	confidential	54,537,230	confidential
PL	P4 sp. z o.o.	1.1438		confidential	54,557,250	confidential
	T-Mobile Polska S.A.	1.1438		confidential	1	confidential
	MEO	confidential		confidential		confidential
PT	VODAFONE	confidential	0.8300	confidential	16,859,476	confidential
	NOS	confidential		confidential		confidential
RO	Vodafone Romania S.A.	confidential	2.3000	confidential		confidential

	Orange Romania S.A.	confidential		confidential		confidential
	TELEKOM RMC S.A.	confidential		confidential] [confidential
	RCS & RDS S.A.	confidential	1	confidential	22,579,060	confidential
	Telekom Srbija	1.6260		confidential		46.10%
RS	Telenor	1.6260	1.6260	confidential	9,155,664	32.30%
	VIP mobile	1.6260		confidential		21.60%
	TeliaSonera	3.2334		5,284,601		35.65%
SE	Tele2	3.2334	3.2334	4,051,145] [27.33%
SE	Telenor	3.2334	3.2334	2,548,298	14,823,000	17.19%
	Hi3G	3.2334		1,924,963		12.99%
	Telekom Slovenije			confidential		50.32%
SI	Si.mobil	Bill & Keep	Bill & Keep	confidential	- confidential	30.50%
31	Telemach			confidential		15.41%
	T-2	I		confidential		3.76%
	Orange Slovensko, a.s.	2.5000		confidential		confidential
CIC	Slovak Telekom, a.s.	2.5000	0.500	confidential] [confidential
SK	O2 Slovakia, s.r.o.	2.5000	2.500	confidential	6,003,784	confidential
	Swan Mobile a.s.	2.5000		confidential		confidential
	Turkcell	0.1315		32,573,556		44.23%
TR	Vodafone	0.1315	0.1345	23,044,383	73,650,996	31.29%
	Avea	0.1437		18,033,057	1	24.48%
	EE	confidential		confidential		confidential
UK	Telefonica	confidential	2.0813	confidential	74,768,223	confidential
- UK	Vodafone	confidential		confidential	14,100,223	confidential
	H3G	confidential		confidential		confidential

Notes concerning subscriber numbers see Notes to Table 7

BE: National incoming SMS termination. Prices are nominal prices.

BG: All data includes number of post-paid and prepaid active mobile subscribers. Number of post-paid active subscribers means number of subscribers with a valid contract. Number of prepaid active subscribers means numbers of subscribers that have made or received a call, sent an SMS or MMS at least once in the last three months. The number of the M2M SIMs is excluded.

CZ: All Czech SMP-operators use the same level of SMS call termination rates all the time without any differences between peak time and off peak time.

DE: SMS call termination rates are not regulated in Germany

DK: In 2015, DBA withdrew all SMP remedies on the wholesale SMS termination market effective as of 1 January 2016. The last regulated SMS termination rate that applied prior to this deregulation was 1.11 Danish øre/SMS. This price was still in effect as of 1 January 2016 but the operators have notified price increases to 10 Danish øre/SMS (1.34 eurocents) that will take effect as of 1 April 2016.

FI: SMS termination rates are not regulated in Finland.

HU: SMS termination rate in national currency has not changed. The HUF / Eur exchange rate has changed only.

IS: SMS TR is unregulated.

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

LU: No data available as not regulated.

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

NL: This is the last known commercially agreed SMS-termination rate. Rate is from 2012 and thus 3 years old.

PL: Number of subscribers as of 31.12.2015.

PT: One MVNO applies a different rate (1.27 euro cents) in a reciprocal way, but it only has around 1% of market share.

SE: PTS does not monitor the SMS wholesale termination rates. The current reference offers indicates a termination rate of SEK 0.30.

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

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

Annex 10 Abbreviations and Exchange rates

Table 10 - Abbreviations

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

Table 11 - Exchange Rates 12

COUNTRY	1 EURO
AL	138.33
BG	1.96
CH	1.10
CZ	27.04
DK	7.44
HR	7.50
HU	313,34
IS	139.56
LI	1.10
FYROM	61.69
NO	9.32
PL	4.37
RO	4.50
RS	123.00
SE	9.28
TR	3.27
UK	0.79

¹² ECB website:

For IS at http://www.cb.is/exchange-rate/

For AL at https://www.bankofalbania.org/web/pub/rpm t1 2016 shqip shtojca 8434 1.pdf

For RS at http://nbs.rs/export/sites/default/internet/english/scripts/kl period.html .

Annex 10 Glossary

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