Migration and copper switch-off status in Greece

OTE S.A. views on current framework and new DNA proposal

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BEREC External Workshop
ON MIGRATION AND COPPER SWITCH-OFF IN LIGHT OF THE DNA

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Competitive dynamics in Greece: fiber migration and take-up accelerating rapidly, but copper still significant

- FTTH Coverage @62%, FTTH take-up @22% both accelerating
- FTTC/Vectoring coverage @ ~60% offered from OTE, Nova & Vodafone using copper sub-loops
- Rural BB subsidized wholesale only networks with 3% coverage using FTTC
- UFBB subsidized wholesale only networks with 18% coverage using FTTH under construction

Switch-off is operator-driven, FTTC by any provider is part of the target solution and is protected

January 2023

NRA (EETT) –defined, part of market analysis decision

April 2025

Additional measure on sw/off monitoring by the NRA

June 2025

OTE has announced the initiation of copper switch-off process in 1st Local Exchange. 6 LE announced in 2025

Definition of different switch-off cases includes FTTC:

Partial switch-off and transition to FTTC/H

Total switch-off of services at a LE, transition to FTTC/H & partial decommissioning of a LE

Total switch-off of services at a LE, transition to FTTC/H & switch-off of the LE (affecting all outdoor cabinets of a LE)

Note: *According to current regulatory framework, OTE cannot remove copper network in outdoor cabinets when a provider develops FTTC (Vodafone & Nova) and Rural-UFBB network, using copper sub-loops. Affected LEs are not part of OTE CSO plan.*

Key safeguards ensuring adequate connectivity for end-users

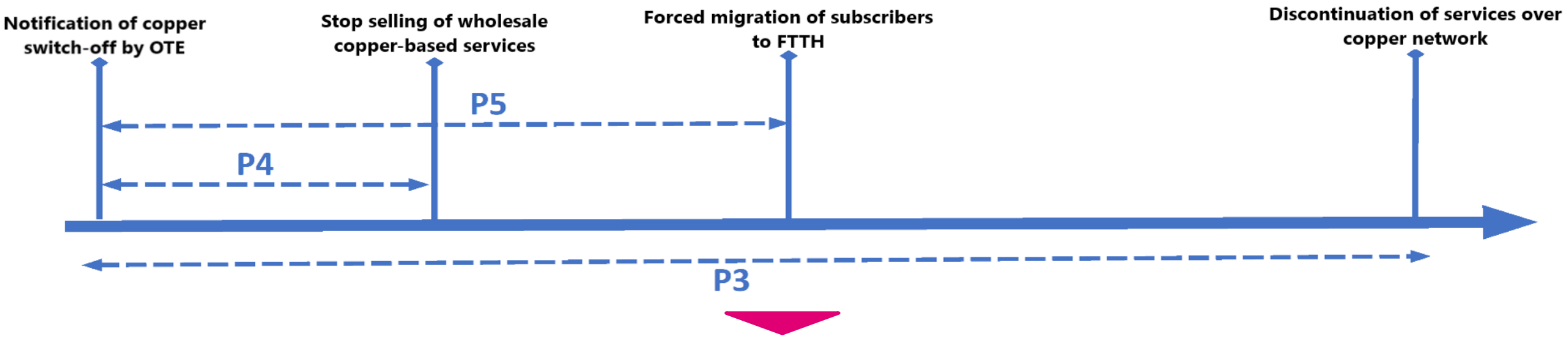
1 **Coverage of all existing copper** connections by the NGA network.

2 **At least 50% of all subscribers** (OTE and ANOs) or 85% of OTE subscribers must have been **switched to NGA** network

3 **At least 50% of buildings** covered by outdoor cabinets must be **connected to FTTH network**

4 Provision of virtual wholesale products of **equal or better quality** compared to those offered to ANOs before copper switch-off.

Timing: four stages spanning up to 3 yrs. from start in each qualifying area



Partial or total copper switch-off in	P3 - Total notification period*		P4 - Stop selling of wholesale copper-based services		P5 - Start of forced migration	
Based on Take up	50% of market or 85% of OTE	75% of market	50% of market or 85% of OTE	75% of market	50% of the market or 85% OTE	75% of market
LE without ANO presence	6 months	6 months	Immediate	Immediate	6 months	6 months
LE without ANO presence with ΑΡΥΣ services	12 months	6 months	3 months	Immediate	6 months	6 months
LE with ANO presence and up to 5,000 active lines	24 months	12 months	6 months	3 months	12 months	6 months
LE with ANO presence and more than 5,000 active lines	36 months	24 months	6 months	6 months	18 months	12 months

Case study for copper switch-off boost and incentivizing FTTH: Stop-selling of FTTC in FTTH-connected buildings (Same WS Access Provider for FTTC and FTTH services)

FTTC

FTTH

Since June 2025, **possibility for a faster stop-selling process of FTTC products in FTTH- connected buildings, which boosts FTTH demand.** Wholesale **Access Provider** is entitled not to fulfill requests for the provision of VULA FTTC in **FTTH-connected buildings** for one or more Local Exchanges (LE) where offers VULA FTTH:

- defined at the OTE LE level for the connected buildings of the specific LE
- LEs for which stop selling will be activated shall be announced by the AP two months prior to the commencement of the stop selling period
- **The AP has the right to discontinue existing VULA FTTC connections after a period of 2 years and 3 months** from the date on which VULA FTTC stop selling was initiated in the specific building

Lessons learned 1: current Greek framework

1. **FTTH coverage ("100% premises covered") threshold should be lowered to 95% per local exchange.** For the remaining 5%, alternative technologies should do (e.g. FWA, based on good practical experience of all 3 major providers, or satellite – recognised as an alternative for USO purposes)

2. **3-year period should allow for flexibility:** copper owner should be entitled to shorten it once certain preconditions have been met, i.e. biggest volume is already migrated

3. **Proper planning in steps is needed for the forced migration:** detailed resource planning is required to avoid excessive peaks in migration demand, esp. towards the end of the process

4. **B2B services and especially B2G (Government) are usually the harder cases for migration:** IP migration is need first and then (or parallel) migration to fiber

5. **"Open access" being offered by all major operators** is an important factor facilitating the migration planning, thus avoiding local monopolies

6. **FTTC stop-selling in FTTH connected building has boosted fiber adoption:** could be extended to copper stop-selling (services from LE) in FTTH connected buildings to further accelerate migration if there is market consensus

Lessons learned 2: implications for the DNA proposal

1. **Migration should be copper provider-driven (initiation, timing), no "one-size-fits-all" approach.** In our case: initiated, structured and timed by OTE along the lines defined by the NRA. Learning: only network owner has the necessary know-how to ensure smooth, pro-customer migration and should be in the driving seat

2. **Migration should allow for the copper owner to roll out own alternative fiber-based connection,** preserving customer choice and variety. Customers usually have bundled services and a forced migration to a different provider could result in a loss of value and quality.

3. **"Open access"** is a necessary prerequisite to avoid local monopolies

4. **Fiber rollout and take-up dynamics are not correlated with copper decommissioning, but with its availability and customers' demand. Fiber in Greece accelerated before any CSO Announcement.** FTTC/Vectoring/Super Vectoring networks are still adequate. In the case of Greece, migration to FTTC is recognized as an alternative to copper.

5. **An enforced CSO would further exacerbate existing bottlenecks in construction, civil engineering and planning capacities.** A market-oriented, demand-driven transition makes it possible to deploy scarce roll-out capacities efficiently. A spike in construction costs in Greece would hurt the current good, market-driven dynamics.

6. **EC-proposed process is unrealistically complex and bureaucratic** with many stakeholders and interactions: copper network owner, NRA, government/ministries, EC and back.

Thank you!

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