

# Evaluation of the Termination Rates Recommendation

Fields marked with \* are mandatory.

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\* 1.1 You're answering as:

- Citizen / individual
- Industry / business
- EU platform/network/association
- Non Governmental Organisation
- National Regulatory Authority
- Other public authority
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\* 1.2 Is your organisation registered in the Transparency Register of the European Commission and the European Parliament?

- yes
- no
- not applicable

\* 1.3 please indicate your organisation's registration number in the Transparency Register

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\* 1.4 Please enter your name or the name of your institution/organisation/business.

European Telecommunications Network Operators' Association (ETNO)

## 1.5 Please provide your e-mail address

Francesco Versace, Director of Regulatory Affairs - versace@etno.eu

- \* 1.6 Contributions received are intended for publication on the Commission's website. Do you agree to your contribution being published?

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- \* 1.7 What is your country of residence? (In case of legal entities, please select the primary place of establishment of the entity you represent)

- |                                      |  |
|--------------------------------------|--|
| <input type="radio"/> Austria        | <input checked="" type="radio"/> Belgium |
| <input type="radio"/> Bulgaria       | <input type="radio"/> Croatia            |
| <input type="radio"/> Cyprus         | <input type="radio"/> Czech Republic     |
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| <input type="radio"/> Finland        | <input type="radio"/> France             |
| <input type="radio"/> Germany        | <input type="radio"/> Greece             |
| <input type="radio"/> Hungary        | <input type="radio"/> Ireland            |
| <input type="radio"/> Italy          | <input type="radio"/> Latvia             |
| <input type="radio"/> Lithuania      | <input type="radio"/> Luxembourg         |
| <input type="radio"/> Malta          | <input type="radio"/> Other              |
| <input type="radio"/> Poland         | <input type="radio"/> Portugal           |
| <input type="radio"/> Romania        | <input type="radio"/> Slovakia           |
| <input type="radio"/> Slovenia       | <input type="radio"/> Spain              |
| <input type="radio"/> Sweden         | <input type="radio"/> The Netherlands    |
| <input type="radio"/> United Kingdom |  |

## 2 Topics for consultation

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## Evaluation of the overall functioning of the Termination Rates Recommendation (TRR)

The questions in this section aim to evaluate its impact on the termination markets in the EU and on the internal market as a whole. This section of the public consultation includes general questions on the functioning of the TRR in relation to the key evaluation criteria established in the Commission's Better Regulation Guidelines (i.e. effectiveness, efficiency, coherence, relevance and EU added value).

2.1 To what extent has the TRR effectively achieved the below objectives:

	significantly	moderately	little	not at all	don't know
*a) the development of the internal market	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*b) the promotion of competition	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*c) the promotion of the interests of the EU citizens, including citizens with disabilities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

2.2 Please explain your response. (\*Please note that there is a limit of 5000 characters for each open text answer)

Since 2012, the EU national voice calls markets have changed dramatically as new forms of communications have emerged (Instant Messaging, Social Networks, VoIP, etc). Furthermore, new innovative commercial offerings are very common today in operators' commercial portfolio. Such offerings go far beyond the traditional per minute basis charging. In practice, most of the voice services marketed are within a bundle (2-play, 3-play or Quad-play) and with generous allowances or even unlimited.

It is fair to say that competition and EU citizens' interests have benefited from recent market evolution, but it is difficult to directly associate these achievements with the Termination Rates Recommendation (TRR).

The Termination Rates Recommendation has had an influence, but market dynamics and technology evolution have been the main drivers of change.

Therefore, the Recommendation has had a limited impact in terms of promoting competition or EU citizens' interests.

The Recommendation has been a clear example of the more general policy underlying the EU regulatory framework in the last years. It was conceived as a measure intended to promote extreme price competition, by setting the lowest possible wholesale price; but it has not taken into account the impact on investment and on the long-term welfare of consumers and society.

\* 2.3 How do you rate the cost-benefit ratio from 1 to 5 (1=costs exceed significantly benefits, 5= benefits exceed significantly costs) regarding TRR efficiency if you compare the administrative and regulatory costs to your organisation with the results achieved?

- 1
- 2
- 3
- 4
- 5
- don't know

2.4 Please explain your response.

As stated before, ETNO sees limited benefits associated with the TRR.

At the same time, the TRR has had an impact on the opportunity costs of the industry in terms of revenues, which has lowered the interest of external investors to invest in the EU telecoms industry.

2.5 Could you give an estimate of annual direct and indirect costs for your organisation in applying the TRR? Please indicate, if possible, the nature of these costs.

See previous question 2.4.

Looking only at direct application costs is not representative of the impact of the TRR.

Direct costs are basically those costs related to implementing specific obligations in compliance with the regulatory framework. For example, they can consist of organizational and labour costs required to cope with regulatory compliance, management of regulatory proceedings and reporting to relevant authorities. The numerous appeal cases, which have taken place across Europe over the last years, should also be factored in among such costs.

However, the most important impact is related to market size and competitive dynamics, cost of capital, etc. This translates into costs that cannot be captured by the annual direct costs borne by the individual organizations in applying the TRR.

2.6 To what extent is the TRR relevant to meeting the policy objectives defined in Article 8 of the Framework Directive?

	significantly	moderately	little	not at all	don't know
*a) the development of the internal market	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*b) the promotion of competition	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
*c) the promotion of the interests of the EU citizens, including citizens with disabilities	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
*d) managing scarce resources (such as numbering, spectrum access)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

2.7 Please explain your response.

The relevance of the TRR for achieving policy objectives such as competition and citizens' interests has been explained in Q 2.2.

The requisite to implement pure LRIC is not really necessary for achieving the policy objectives listed above.

The policy objectives could be better achieved by following a series of principles for the cost accounting system (see below on questions 2.34 and 2.56).

We do not see any relation with the managing of scarce resources (numbering or spectrum).

- \* 2.8 One of the objectives of the TRR is to create a level playing field and increase competition between operators by reducing cross-subsidisation in particular of mobile networks by fixed networks or, of net receivers of voice traffic by net senders, and the development of flat-rate and/or bundled services.

Has implementing the TRR led to a higher number of flat-rate offerings (fixed to mobile calls included) and/or bundles?

- significantly
- moderately
- little
- not at all
- don't know

2.9 Please explain your response.

Innovative commercial offers have appeared across EU28 markets over the past years.

However, there is no evidence that the TRR has a direct relation with the development of flat-rate offers. If there was an impact, it was small and very difficult to assess due to the variety of factors influencing market evolution.

Market dynamics, mainly driven by competition in retail voice call markets, played a central role in the emergence of these innovative offers. Other non-EU regions without TRR in place achieved similar commercial outcomes. Therefore, the TRR's impact on the policy objectives seems to be very limited.

In some Members States where the TRR approach to "pure" LRIC has not been followed, the trend has been similar. As a conclusion, there is no indication that the current focus of the Recommendation on "pure" LRIC has been at the heart of the higher number of flat-rate offerings.

2.10 The TRR was expected to provide additional revenue and investment opportunities (development of next generation networks and high bandwidth offerings) for fixed operators and increase their ability to compete with mobile offers. Has this expectation been met?

	significantly	moderately	little	not at all	don't know
* a) investment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* b) ability to compete with mobile offers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

### 2.11 Please explain your response.

The “pure” LRIC approach of the TRR is focused on price reduction and has decreased overall revenues for operators, hampering their capacity to invest.

The evolution of broadband markets and especially NGA has not been promoted by the implementation of the TRR and by its disproportionate approach to the lowest cost standard.

Fixed operators have also heavily suffered from regulation. Fixed termination rates were also severely impacted by the TRR and reduced to the level of marginal costs.

Regarding fixed to mobile calls, the retail markets are so competitive that it is impossible for fixed operators to maintain more generous margins for these types of calls.

### \* 2.12 Have the lower termination rates led to decreased entry barriers for new operators who decided to enter the fixed and mobile telephony markets?

- significantly
- moderately
- little
- not at all
- don't know

### 2.13 Please explain your response.

Probably, no entry decision would be taken on the basis of termination rates set at pure LRIC level. Better return prospects would help develop the market, rather than discretionary and artificially low termination rates. If termination rates are not enough to cover the costs, this creates a disincentive to enter the market. Investments in telecommunication networks are sunk, and market entry is associated to high risks.

In this respect, in light of current market circumstances, we can conclude that the TRR is superseded and that maintaining the current approach on pure LRIC would be unreasonable.



\* 2.14 Have lower termination rates led to increased end-user welfare?

- significantly
- moderately
- little
- not at all
- don't know

2.15 Please explain your response.

Most of the EU citizens' welfare increases was achieved by market or commercial dynamics rather than the TRR. In the best case, TRR may have played the role of accelerating those commercial dynamics. But relying upon a higher cost standard would have produced the same commercial dynamics.

2.16 If you consider that end-user welfare has increased as a result of the TRR, how has this been reflected on the market?

	significantly	moderately	little	not at all	don't know
* a) lower retail prices	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* b) flat-rate retail packages	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* c) increased usage	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* d) fixed-mobile convergent services	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
* e) increased investments in next generation networks	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* f) other (please specify)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

2.17 Please explain your response.

As explained before, the TRR has had little impact on all previous parameters. It seems obvious that it has had no impact on NGAs as the TRR is a value-destructive regulatory measure. It is negatively affecting operators' ability to invest, especially in NGAs.

The categories a) - d) are influenced by competition in the retail market for voice services. Where other costing methodologies different than pure LRIC have been implemented, we have also seen strong competition in the retail voice market with lower retail prices, flat rate tariffs and fixed-mobile convergent products.

2.18 What was the impact of the TRR on pre-paid customers in terms of the number of offers?

	significantly	moderately	little	not at all	don't know
* a) increase	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
* b) decrease	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

2.19 Please explain your response.

The number of offers for prepaid customers did not change significantly, but in some countries the entry-level pre-paid offers have been affected, with top-up prices going up for those type of offers.

There has not been an increase of prepaid offers, but rather a shift to contract/postpaid offers. Most of the commercial innovation has been focused in the contract/postpaid segment, with operators trying to increase penetration of postpaid.

2.20 How does the asymmetric implementation, i.e. the non-compliance of Member States with the recommended approach, impact on cross-border trade, investment and end-users?

	significantly	moderately	little	not at all	don't know
* a) trade	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* b) end users	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
* c) investments	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

2.21 Please explain your response.

ETNO would like not to respond to this question. For this reason, we choose "don't know".

2.22 Could you quantify the above impact on:

(i) trade

(ii) investment

(iii) end-users

2.23 Please list the elements of the current TRR which were most difficult to interpret.

2.24 Is there any other impact of the TRR that the questions above don't mention?

\* 2.25 Have lower termination rates led to an increase in the retail prices for other services?

- yes
- no
- don't know

2.26

If yes, please list the services concerned and provide underlying data.

Lower termination rates have possibly affected to a certain extent the portfolio of services other than termination. See our answer to next question.

2.27 Please explain your response.

Obviously, when MTRs and FTRs are based on pure LRIC, common and joint costs should be allocated to the rest of services. However, it is very difficult to quantify or to establish a causal relationship. Since the adoption of the Recommendation, the market has shifted towards more and more data-centric offers. This situation gets increasingly complex as bundles (double play, triple play or quad play) are more and more the rule when voice services are marketed. In this sense, cost allocation among different services in the bundle gets blurred.

2.28 What is the impact of lower termination rates on wholesale international roaming charges in the EU?

### Forward-looking questions – follow-up to the Termination Rates Recommendation

In this second section, the consultation seeks views on whether further action on termination rates is needed, and if so, what the most appropriate way forward would be with regards to a future legal instrument, and substance of any further Commission measure.

\* 2.29 Given the current monopolistic character of call termination markets will they remain a bottleneck in the future and require continued regulation?

- yes
- no
- don't know

2.30 Please explain your response.

In an all-IP environment, call termination markets face competitive pressure from other types of calls and communications services that run over broadband connections. This also exerts a competitive pressure on termination markets. Therefore, regulation should take these trends into deep account, and be reviewed due to such competitive pressure.

\* 2.31 Is it still appropriate to act on fixed and mobile termination rates at EU level?

- yes
- no
- don't know

2.32 Please explain your response.

See our answer to question 2.34. The requirement of symmetry could be kept, by setting symmetric fixed termination and symmetric mobile termination rates.

\* 2.33 Do any areas in the TRR need improvement in terms of simplification, reducing the regulatory burden and associated costs?

- yes
- no
- don't know

2.34 Please explain your response.

If termination regulation remains, the following principles should be applied:

- Regulation should promote long-term benefits for end users, taking account of competition and promoting investment (including through providing appropriate regulatory stability), inter alia enabling operators to invest in technology evolution and improved quality;
- Full cost recovery for all market players;
- Better legal certainty;
- Decreased complexities;
- Avoid litigation and burdensome processes. For example, review periods longer than the typical current 3 years market analysis are desirable;
- Symmetry between FTR and symmetry between MTR;
- If market developments change significantly, the need for regulation has to be reviewed earlier;

European operators should not incur any disadvantage with third countries operators. European operators should be enabled to manage efficiently agreements with any operator regarding traffic originating outside the EEA.

2.35 What are the TRR objectives that have not yet been achieved?

\* 2.36 Are there additional objectives, other than those of the existing TRR, to be achieved with a potential future EU-level action on termination rates?

- yes
- no
- don't know

2.37 Please explain your response.

\* 2.38 What legal instrument would be best suited to address the regulation of termination rates in the future?

- revocation of recommendation and reliance on competition law
- recommendation under Article 19 of the Framework Directive
- decision under Article 19 of the Framework Directive
- legislative initiative at EU level (Regulation, Directive)
- other (please specify)
- don't know

2.39 Please explain your response.

See answer to question 2.34.

\* 2.40 Some stakeholders support the creation of an EU cost model to replace current national models. Would such an EU cost model be a valid option?

- yes
- no, an EU cost model is not a valid option

2.41 Please explain your response.

Please disregard the answer to q. 2.40. ETNO would like not to respond to the question. However, the system forces to choose a response anyways.

- \* 2.44 The Explanatory note to the Recommendation on Relevant Markets foresees that: "In a future all-IP world, the distinction between voice and data for terminating purposes would be blurred and costs of both voice and data are expected to fall since NGN networks are expected to deliver most services over a common platform. The bottleneck which is intrinsic to the terminating network could eventually disappear, as long as the pricing scheme for a two-way interconnection of two networks no longer envisages distinct termination charges when voice data is transferred from one operator's network to the other. This would consequently enable the NRAs to deregulate the fixed and mobile termination markets."

Do you agree with that statement?

- yes
- no
- don't know

2.45 Please explain your response.

The evolution of technology is leading voice services to be increasingly provided on IP platforms. This has several implications, such as that there is an important competitive pressure from OTT services over operators' voice services. OTT voice services are widely perceived by users as substitutes to the services provided by operators.

This also provides competitive pressure on interconnection services, and on the ability of network providers to exploit the "termination bottleneck". Therefore, if still needed, regulation has to be reviewed due to this competitive pressure.

However, the fact that in the future voice services will be offered more and more on all-IP networks does not mean that there will be no termination rates. There will still be a need to have termination rates in order to support competitive and interoperable specialized voice services with distinct quality.

It should be clear that only undertakings supporting the costs of a network carrying telephone services with "carrier grade" quality to the end users should be entitled to receive termination fees.

On the other hand, the question seems to suggest a future scenario where the need for regulation will only disappear if the termination rates are zero. But today's unregulated data IP-Interconnection with its peering and transit regime does not mean that there is a termination rate equal to zero. Peering is only a barter regime between equal partners, with almost equal termination rates and an equal amount of traffic exchanged. Particularly, between unequal partners with asymmetric exchanged traffic amounts the termination rate determined in the interconnection contracts is strictly billed.

2.46 How would the move to all-IP networks impact on the evolution of termination rates?

See answer to question 2.45 above.

\* 2.47 Would the move to all-IP networks remove the bottleneck characteristic of termination markets?

- yes
- no
- don't know

2.48 Please explain your response.



\* 2.49 Would BU-LRIC-based regulation of termination rates still be needed in an all-IP networks scenario?

- yes
- no
- don't know

2.50 Please explain your response.

Pure BU-LRIC should be abandoned as it does not ensure appropriate cost recovery, is not proportional, is too complex and has created legal uncertainty.

2.51 What market/technological evolution(s) would put an end to the termination bottleneck?

See our answer to questions 2.30 and 2.45.

\* 2.52 Will the continued use of numbers from a national numbering plan for voice calls perpetuate the termination bottleneck?

- yes
- no
- don't know

\* 2.53 Some regulators include certain types of unmanaged VOIP services, e.g. where the end-user is provided with an 8-digit number, in the fixed termination market.

Are the costs of an unmanaged VOIP service comparable to those of managed/circuit-switched networks, justifying the application of the same level of fixed termination rates?

- yes
- no
- don't know

2.54 What should be the period set in any future EU measure on termination rates for the review of this instrument?

There is a clear need for regulatory stability and regulatory predictability to boost long-term highly risky investments. Indeed investors in such projects prefer to have clear visibility on what to expect as external constraints, and this over a longer period of their investment timeframe. Longer review periods than those currently applied today are preferable. But if market developments change significantly due to strong competitive pressure from new forms of communication services the need for regulation has to be reviewed earlier.

\* 2.55 Should the Commission continue to recommend the pure BU-LRIC model?

- yes  
 no

2.56

Please describe the characteristics of an alternative cost model.

As said above, pure BU-LRIC models are not proportional, do not provide legal certainty and are complex.

If termination regulation remains, the following principles have to be applied:

- Regulation should promote long term benefits for end users, taking account of competition and promoting investment (including through providing appropriate regulatory stability) inter alia enabling operators to invest in technology evolution and improved quality;
- Full cost recovery for all market players;
- Better legal certainty;
- Decreased complexities;
- Avoid litigation and burdensome processes, for example, review periods longer than the typical current 3 years market analysis are desirable;
- Symmetry between FTR and symmetry between MTR;
- If market developments change significantly, the need for regulation has to be reviewed earlier;

European operators should not incur any disadvantage with third countries operators. European operators should be enabled to manage efficiently agreements with any operator regarding traffic originating outside the EEA.

2.57 Please explain your response.

\* 2.58 Should the Commission issue further guidance on the recommended pure BU-LRIC model?

- yes  
 no  
 don't know

2.60 Please explain your response.

- \* 2.61 Evidence shows a discrepancy in the level of termination rates coming out of pure BU-LRIC and non-pure BU-LRIC models but also among rates resulting from pure BU-LRIC models implemented in different Member States.

The divergence of pure BU-LRIC rates in different Member States is due to:

- objective national specificities
- different practical implementation of the TRR e.g. with regard to the calculation of capital, commercial, spectrum costs
- both
- other

2.62

Please explain your response.

ETNO would like not to tick any box here. We choose "other" because the system forces to choose a response.

- \* 2.63 According to the TRR, pure BU-LRIC should be based on the technological choices available in the timeframe considered by the model to the extent that they can be identified. The access part of mobile networks was thus supposed to be modelled as a combination of 2G-3G.

Which technology should be considered as efficient in a follow-up instrument to the TRR?

- 4G
- 5G
- a combination of both
- don't have an opinion

2.64

Please explain your response.

A pure BU-LRIC approach is not the right approach, as it leaves out overheads and common costs, which will then need to be recovered on the remaining other services and therefore will create distortions in other markets (costs should be recovered somewhere).

Having said that, and regarding the inclusion of 2G, 3G, 4G and 5G:  
The modelling should include all relevant and deployed Gs as the costs of real networks include a mix of technologies. The point is to take into account all running technologies in real life networks. A pure theoretical model including only a subset of technologies would not be proportional.

\* 2.65 Which interconnection level should be modelled (multiple answers possible):

- IP
- national
- regional
- local
- don't know

2.66

Please explain your response.

\* 2.67 Should the backhaul technology modelled be (multiple answers possible):

- copper
- fibre
- microwave
- don't know

2.68

Please explain your response.

The cost of backhaul should be taken into account in the cost modelling exercise. It should include a mix of technologies that will be used in the real world (copper, fibre, wireless, etc.)

\* 2.69 Regarding the choice of the pure LRIC increment, do you consider it should be defined as:

- voice only
- voice and SMS
- voice and data
- voice, SMS and data
- other
- don't know

2.70

Please explain your response.

\* 2.71 Should the modelling period be:

- single year
- multiple years
- other
- don't know

2.72

Please explain your response.

Should a cost-based approach be applied, investments need to be incorporated adequately in the model. Hence the modelling period should be designed for several years. But if market developments change significantly due to strong competitive pressure from new forms of communication services the need for regulation has to be reviewed earlier.

2.73 Are the objective cost differences defined in points 9 and 10 of the TRR still valid to allow for differentiated rates?

The cost differences mentioned in point 9 of the TRR due to costs for mobile licenses are still valid to allow for differentiated termination rates for mobile and for fixed.

The mobile licenses are essential to provide mobile services. Therefore the investment costs in mobile licenses has to be considered in determining the mobile termination rates. Because of increasing bandwidth in mobile networks new and/or more licenses are needed over time.

On the contrary, the cost differences of a newcomer in the mobile network market mentioned in point 10 of the TRR are not relevant anymore. Indeed in the last years the mobile market has been rather characterized by a consolidation trend and not by new entries. Only in exceptional cases, we have seen new full MVNOs entering the market. Allowing them a higher MTR would not be justified as their cost structure is much lighter than MNOs cost structure. MTRs have to be symmetric also in the case of possible new entrants resulting from remedies imposed to the merging parties in consolidation processes.

2.74 Should the 4 years following market entry (point 10 of the TRR) be kept as a transitory period during which new mobile entrants operating below the minimum efficient scale could be allowed to recoup the higher per-unit incremental costs they incur?

See answer to question 2.73 above.

\* 2.75 Are there other objective cost differences than those in points 9 and 10 of the TRR which justify higher termination rates (than the efficient level).

- yes
- no
- don't know

2.76

Please explain your response.

Mobile termination rates should include the cost of the access network (the radio access network), whereas fixed termination rates do not include the cost of the access network, as such costs are covered by monthly rental rates. Therefore, for MTRs it is crucial that access costs are adequately reflected.

\* 2.77 The minimum efficient scale for the purpose of the costing model is 20% for mobile networks with the possibility for NRAs to deviate from it on the basis of different market conditions (multiple answers possible).

- the 20% is still appropriate
- the possibility to deviate from the recommended 20% should be kept
- the 1/N approach (N = number of mobile network operators) is more appropriate than the recommended 20%
- other (please specify below)
- don't know

2.78

Please explain your response.

\* 2.79 While some NRAs entirely disregard wholesale commercial costs in their models, others have included these costs in the termination rates. Does the calculation of wholesale commercial costs need further guidance?

- yes
- no
- don't know

2.80

Please explain your response.

## **Background Documents**

[Background \(/eusurvey/files/422067a6-4837-4616-8baa-b2ce006874b8\)](/eusurvey/files/422067a6-4837-4616-8baa-b2ce006874b8)

[Consultation publique \(/eusurvey/files/3d0aa0c2-f3c6-4b60-a19b-5f429fd53315\)](/eusurvey/files/3d0aa0c2-f3c6-4b60-a19b-5f429fd53315)

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[Datenschutzerklärung \(/eusurvey/files/e012e2f5-a15d-4ae4-962e-b0f0f845c241\)](/eusurvey/files/e012e2f5-a15d-4ae4-962e-b0f0f845c241)

[Declaration relative - protection de la vie priv \(/eusurvey/files/b025ab1a-2f94-4706-91c8-7bcc088fc42a\)](/eusurvey/files/b025ab1a-2f94-4706-91c8-7bcc088fc42a)

[Hintergrund \(/eusurvey/files/64fbf0c5-bd4b-4a99-a4e2-73098ffd8c54\)](/eusurvey/files/64fbf0c5-bd4b-4a99-a4e2-73098ffd8c54)

[Konsultation des ffentlichkeit \(/eusurvey/files/943a855b-47ae-4282-80c6-8db48f3ce98d\)](/eusurvey/files/943a855b-47ae-4282-80c6-8db48f3ce98d)

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[Public consultation \(/eusurvey/files/742fc517-c86f-436f-8ab6-3c2ddaba9f6c\)](/eusurvey/files/742fc517-c86f-436f-8ab6-3c2ddaba9f6c)

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