Annual Report | **2012**

DRIVING THE DIGITAL FUTURE

etno

European Telecommunications Network Operators' Association

Contents

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Introduction by
the ETNO Director, Daniel Pataki

The year 2012 has been marked by major developments that have occurred on the policy and regulatory scene. We can easily say that we have witnessed a fundamental shift in the policy for this sector.

The announcement by Vice President Kroes in July 2012 of a new approach for broadband regulation has become a major milestone in the recent history of this sector.

There is now a common understanding that enabling operators to make the investments that will unlock growth for our sector requires a fundamental change to the regulatory approach. The regulatory framework has been instrumental in opening markets in Member States to competition and create more choice for consumers. It now needs to evolve in order to reflect the rapid changes in technology but also the challenges faced right now by industry.

The launch of this new approach is also the result of a stronger dialogue between policy makers on one side and the investing community on the other. The communication on the new regulatory approach for broadband has been largely welcomed by investors, showing that when the right balance is found, regulation can provide the certainty and confidence that encourages investment.

ETNO strongly believes that this new approach strikes the right balance in order to improve incentives for investments while at the same time reinforcing competition. It is key that this is reflected in the forthcoming regulatory initiatives by the European Commission and fully embraced by the national regulators and their European body, BEREC.

The stability of current copper wholesale prices is essential in order to maintain the investment capacity and incentives of the market. At times when the sector is going through consistent revenue decline and when consumers' take up of NGA remains uncertain, a decline in copper prices would have sent a very negative signal to investors.

Price flexibility for fixed NGA wholesale products is essential for introducing new differentiated offers and drive service innovation. A strict application of cost orientation does not allow this flexibility and acts therefore as a deterrent for investments.

Pricing flexibility will allow operators to meet consumer demand for more differentiated packages tailored to their needs, creating more choice for consumers. This is a key factor to enable value creation and encourage investment in new networks and accelerate consumer take up.

The launch of the review of the EC Recommendation on the List of Relevant Markets has been another major initiative.

As the next review of the Regulatory Framework will take at least a few years before it enters into force, the new recommendation will be a major opportunity to ensure that regulation reflects radical changes in markets and competition.

Throughout 2012, ETNO, which celebrated its 20 years, has considerably increased its visibility and presence on both the EU and global scene, as a constructive player in the regulatory and policy debates. The role of our members in achieving the Digital Agenda goals is also fully recognised by policy makers.

Ensuring that the regulatory environment evolves as to allow our members to continue playing this key role will remain our priority.

I wish you an enjoyable read.

Dániel Pataki
ETNO Director

Introduction by the ETNO 2013 General Assembly Chair

It is an honor for me to chair the ETNO General Assembly this year and I look forward to welcoming ETNO and its members to Oslo in November 2013.

The upcoming General Assembly marks yet another exciting and challenging year for ETNO and its members. The industry is facing unprecedented expectations to deliver high speed broadband infrastructure and services essential for productivity and growth in a time when resources are scarce and the business environment is in a transitory phase. We should not forget, however, that the uncertainties we face from various sides also provide us with a lot of opportunities. The digital information society represents a blue ocean of vast dimensions and telecom operators play an essential role in its development.

This introduction is written at a time when the industry awaits the European Commission's legislative proposal which offers the prospect of removing barriers to completing the single market for telecommunications. The Commission expects this to attract investments to the benefit of European industry and citizens, critical for achieving the political and economic objectives of the EU. Whether the proposal will deliver on its promise to remove obstacles for a genuine single market and attract the much needed investment is, however, yet to be seen.

We are witnessing a remarkable increase in the demand for bandwidth on all platforms from various forms of content, especially video. An increase in the demand for our network services is a welcome challenge. However, we are facing an extraordinary situation that is placing heavy demands on our business: on the one hand to meet our end users' needs for high bandwidth and quality of service, and on the other hand to ensure a reasonable return on our investments in infrastructure in an increasingly competitive environment. It is vital that we manage to establish sustainable business models that strike a proper balance between the supply and demand for bandwidth to ensure sufficient investments into future technologies and services. Therefore it is crucial that our industry retains the flexibility to explore various models without being constrained by regulation.

European telecom policy represents an important component in ensuring sufficient investment in ICT, growth and prosperity for Europe. Equally important is the role of market players and national governments. By regulating national markets wisely and by embracing the possibilities that the information technology can provide, governments can play a key role in promoting digital services and network. Similarly, the telecommunications industry itself can play an important role by contributing to the new ICT ecosystems of new advanced services and ensuring trust among its end users for adopting new digital services.

With these words I would like to thank ETNO and the ETNO Office for its constant effort in conveying the views of the industry towards policy makers, for building an increasingly successful and trusted association and for its always professional and helpful attitude.

Harald Krohg
Chairman of ETNO General Assembly 2013
Telenor Norway

Introduction by the ETNO Executive Board Chair, Luigi Gambardella

2012 has been a significant year for our Association which celebrated its 20 years since its creation in Madrid in 1992.

Looking at the past 20 years, the market context for ETNO member companies changed considerably, requiring constant adaptation to new forms of competition and evolving consumer habits.

These changes also affected ETNO which has been able to adapt itself to new realities and embrace new priorities. ETNO successfully positioned itself as the leading trade association of our sector, a key interlocutor for the EU Institutions and a strong voice in the public debate also worldwide.

This "birthday" provided the chance to look forward, to identify the opportunities and the challenges that lie ahead and to think about how to ensure a brighter future for our industry in the EU and on the global scene.

ETNO has been working hard, both on the Brussels scene and at the international level, to raise awareness of the issue of the imbalance between players investing in networks that make Internet access possible and players benefitting from its impressive growth, and particularly Over the Top players (OTTs).

ETNO has been instrumental in ensuring that the need to address the sustainability of the Internet is fully recognized by policy makers in Europe and beyond.

Europe telecoms' sector is faced with structural rather than cyclical changes which have contributed to a consistent revenue decline over the past years. With a total of 274.7 billion euro in 2011, the overall EU telecoms sector turnover declined for the third year in a row. Between 2007 and 2011, revenues shrunk by 8%. As a consequence,

Europe's share of the global telecoms market fell from 31% to 25%. Revenues have continued to drop in 2012 by 3%. Europe's telecoms market is the only market in the world to register a revenue loss. Between 2006 and 2011, the turnover of Asian and North American sectors has been increasing, respectively, by 72% and 56%. The overall market capitalization of telecoms operators in Europe has decreased by 28%.

Nevertheless, we are proud that despite the difficulties the sector is experiencing, ETNO members continue investing huge resources to deploy networks. In 2011, investments in wireline networks in Europe amounted to 24.8 billion euro, increasing by 4.9% compared to 2010 (with ETNO members still accounting for 67% of this expenditure). Investments in mobile networks represented 45.5% of the total CAPEX in Europe, or 20.7 billion euro, a 5.6% increase compared to 2010. ETNO members accounted for nearly 63% of this expenditure.

Policy makers are aware that there is a need for a bold policy to address this situation and ensure that operators are in a position to develop new business models, in order to maintain their investment capacity and to be able to play their role in achieving the Digital Agenda goals.

The telecoms sector accounts for almost 3% of EU GDP and a 10% increase in broadband penetration could yield up to 1.5% increase in annual GDP and raise labour productivity by 1.5% over the next five years;
The telecoms sector is a key driver of growth in Europe This message has been taken by the EU Institutions and a process of policy review for the EU telecom market is under way. ETNO actively contributes to this process and will keep working hard in shaping the policies for a renewed course of growth for the EU digital economy.

Luigi Gambardella
ETNO Executive Board Chair
Telecom Italia

ETNO 2012 HIGHLIGHTS

8 FEBRUARY 2012

ETNO Costing Workshop

Approximately one hundred participants from the European Commission, national regulators and Member States as well as industry representatives, academics and investors participated in an ETNO workshop entitled *"How to boost investment in next generation access networks: the impact of regulated prices on investments"*, organised under the auspices of the London School of Economics. The workshop was the occasion of a lively debate on the Commission proposal for a new recommendation on methodologies to calculate the cost for accessing wholesale copper prices. Brian Williamson, Plum Consulting, presented a report for ETNO entitled: *"Copper pricing and the fibre transition – escaping a cul-de-sac"*.

More information:
http://www.etno.be/events/2012/33

19 APRIL 2012

ETNO-ITU Workshop on 'Revising the International Telecommunication Regulations (ITRs) - Preparations for WCIT 2012'

High-level policy makers and industry representatives from Europe and beyond gathered in Brussels for a workshop organised jointly by ETNO and the ITU. The workshop was hosted at Belgacom's Headquarters and was opened by Didier Bellens, Belgacom CEO, and Luigi Gambardella, ETNO Board Chairman.

"International Telecommunication Regulations date from an era when the Internet and mobile phones were inexistent. The next World Conference on International Telecommunications will be an important opportunity to ensure that recent rapid technology and market changes are fully reflected in any revised framework going forward. It is essential to take a balanced approach which ensures that Internet innovation continues to grow and evolve successfully for the benefit of society and the economy as a whole", said Luigi Gambardella, ETNO Executive Board Chairman.

The workshop involved high level industry speakers from across the globe, including speakers from the ITU, ISOC, the Council of Europe, the European Commission, Ambassador David Gross and US Ambassador to the EU, William Kennard.

More information:
http://www.etno.be/events/2012/1

ETNO 2012 HIGHLIGHTS

30 MAY 2012

ETNO-Total Telecom Regulatory Summit

The ETNO- Total Telecom Regulatory Summit, opened by Georg Serentschy, 2012 BEREC Chair, and Anthony Whelan, Head of Vice President Kroes Cabinet, attracted about 200 participants from the EU Institutions, national regulators, industry, academics and investors. The ETNO-Total Telecom Regulatory Summit was the occasion for a vivid debate between telecoms players, EU Institutions and investors on how to best encourage investments in high speed broadband networks. ETNO called on the European Commission to help reverse the trends of declining revenue in the sector through a change in regulatory policy that supports investment.

More information:

http://www.terrapinn.com/2012/ttreg/

http://www.etno.eu/home/press-corner/etno-press-releases/2012/165

12 JULY 2012

European Commission announcement on new regulatory approach to broadband networks

ETNO welcomed the announcement by Commissioner Kroes on the policy and regulatory approach for the next years in the electronic communication sector in Europe. ETNO fully supported the Commission's analysis that lowering copper wholesale prices would have led to less investment in high-speed broadband. ETNO welcomed increased pricing flexibility for next generation access networks, as an essential instrument to allow for new business models to emerge and support return on investment.
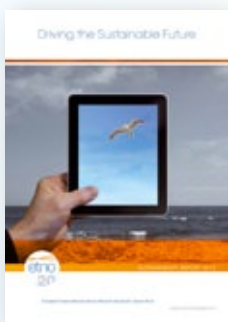
More information:

http://www.etno.be/home/press-corner/etno-press-releases/2012/126

ETNO 2012 HIGHLIGHTS

20 SEPTEMBER 2012

ETNO workshop at ITU
Green Standards Week

On the occasion of a workshop held jointly by ETNO and the ITU at the ITU Green Standards Week in Paris, ETNO unveiled its new Sustainability Report and Corporate Responsibility Charter. The ETNO Charter was upgraded to reflect new challenges ahead and to embrace new key areas such as sustainable supply chain management and protection of children and minors online.

More information:
download the ETNO
Sustainability Report

2 OCTOBER 2012

ETNO-FT CEO Summit:
"*20 years ago-20 years ahead,*
a smart Europe in a smart world"

Chief Executive Officers of the leading telecoms operators from Europe and beyond took part in the ETNO-Financial Times CEO Summit opened by Vice-President Kroes. Coinciding with the 20th Anniversary of ETNO, the Summit, which attracted up to 350 delegates, looked at main challenges faced by the telecoms markets over the past years as well as the growth opportunities and the ways to unleash them. Chief Executive Officers gave support to the new regulatory approach for broadband networks launched by Vice President and called for a true level playing field between telecoms operators and over the top players.

Another highlight of the ETNO-FT Summit was the presentation by A.T. Kearney of a report entitled "*A Future Policy Framework For Growth*". The report identified opportunities for growth in the sector. New value-added offers are seen as positive for both consumers and operators and according to A.T. Kearney could lead to up to €32 billion additional annual revenue by 2020. Furthermore, the sector must focus on reversing the decline in core communication revenues by monetising the growth in broadband traffic and also improve its competitiveness. The report also noted that growth will only be possible if the right policy conditions are in place and suggested improvements to the regulatory and competition policy framework.

More information:
http://event.ft-live.com/ehome/index.
php?eventid=43403&

ETNO 2012 HIGHLIGHTS

2 OCTOBER 2012

ETNO 20th Anniversary

Following the ETNO-FT CEO Summit, about 250 representatives from the EU Institutions, the regulators, Member States, industry and the press joined the ETNO 20th Anniversary reception hosted in the Palais des Academies. The event was opened by Cesar Alierta, CEO of Telefónica, one of the founding members of ETNO.

25 - 26 OCTOBER 2012

ETNO 42nd General Assembly

Senior representatives from ETNO's 38 members and 12 observers met in Krakow, Poland for their 42nd General Assembly to be hosted by Orange Polska on 25-26 October. It was the occasion for ETNO members to review main activities and topics of the year and approve the ETNO strategy for 2013 and the budget. The General Assembly was opened by Mr Maciej Witucki, President & CEO, Orange Polska and Magdalena Gaj, President of the Polish NRA (UKE). The CEPT Chairman, Mr Marcin Krasuski, gave a presentation on the forthcoming WCIT.

In a **joint statement**, ETNO members called for a new policy framework for growth.

"We face a great challenge of attaining the goals of the Digital Agenda. ETNO supports those goals, but it is clear that investment conditions, including a regulatory environment which encourages investment, are of key importance for profitability. ETNO has therefore welcomed the recent announcement by the European Commission on the need to adapt the regulation of NGA networks. The review of the relevant markets recommendation recently started by the EC represents another key opportunity to adapt regulation to evolving realities. This is a good occasion for ETNO to express its expectations and propose constructive solutions", said Marta Brzoza, Regulatory Affairs Director, Orange Polska, General Assembly Chair for 2012.

Other main highlights from the General Assembly:

Jos Huigen, KPN, Vianney Hennes, Orange and Lotte Abildgaard, Telenor, were re-elected as members of the Executive Board by the General Assembly.

The General Assembly of ETNO also re-elected Luigi Gambardella, Telecom Italia, as the ETNO Executive Board Chair for 2013.

"Market changes and the EU objectives of growth require a change in the policy mindset: The policy framework, while providing for certainty to all players, should be flexible enough to adapt to market and technological evolution. If the electronic communications industry undergoes important changes in the reference scenario, then policies should be adjusted in order to achieve the long term objectives of industry competitiveness and market growth", said Luigi Gambardella.

ETNO members also welcomed Etisalat, STC & Syniverse, as new observer members of ETNO.

The 2013 General Assembly will be hosted by Telenor in Norway.

ETNO 2012 HIGHLIGHTS

16 NOVEMBER 2012

EU internet week

In the Context of the EU Internet Week, ETNO hosted a breakfast debate on the EU Telecoms Sector today and tomorrow and the potential of low-carbon IT services to drive forward a sustainable Europe. On this occasion, the latest ETNO annual economic report on the main trends for the sector was unveiled by Didier Pouillot, IDATE. Other speakers included Daniel Pataki, ETNO Director, Danilo Riva, Chair of ETNO Corporate Responsibility Group and Colette Maloney, Head of Unit, Smart Cities and Sustainability, DG CONNECT.

http://www.eu-ems.com/summary.asp?event_id=137&page_id=1145

MAIN ACTIVITIES of the year

1. DIGITAL AGENDA

BACKGROUND:

The 2012 Digital Agenda Scoreboard published by the European Commission showed continued progress towards achieving the DAE. The 2013 target of providing all households with a basic broadband connection was almost attained with 95% of households covered (target: 100%). Europe is already half way to the 2020 target of covering all households with 30 Mbps. However, only 2% of households have actually subscribed to a 100 Mbps connection which is far from the 50% target.

In December, the European Commission adopted seven new priorities in order to accelerate the achievement of the DAE targets.

European Commission Vice President Neelie Kroes said: *"2013 will be the busiest year yet for the Digital Agenda. My top priorities are to increase broadband investment and to maximise the digital sector's contribution to Europe's recovery."*

Full implementation of this updated Digital Agenda would increase European GDP by 5%, or 1500€ per person, over the next eight years, by increasing investment in ICT, improving eSkills levels in the labour force, enabling public sector innovation, and reforming the framework conditions for the internet economy.

More information: http://europa.eu/rapid/press-release_IP-12-1389_en.htm

MAIN ACTIVITIES of the year

ACTIVITIES:

Commenting on the 2012 Digital Agenda Scoreboard, ETNO welcomed continued progress towards achieving the Digital Agenda goals but insisted that more needed to be done to accelerate progress especially on the 2020 broadband targets.

More information: http://www.etno.be/home/press-corner/etno-press-releases/2012/3

The European Digital Agenda (DAE) targets are challenging but the 2020 target of 30Mbit/s for all European households could be achieved in most Member States through a mix of technologies and platforms including Cable, FTTH, FTTC/VDSL, LTE and satellite.

To maximise this potential, ETNO called for a technology neutral regulatory approach, providing for a fair return on investment and encouraging new business models. The role of copper networks to achieve the Digital Agenda goals should not be underestimated. Through advanced Fiber to the Cabinet solutions, such as vectoring, copper will contribute to providing access to up to 100 Mbit/ s in many MMember States.

Wireless networks will also play an important role in delivering 30Mbit/s to all, especially in rural areas. The opening up of the 800MHz digital dividend band enshrined in the Radio Spectrum Policy Programme is an important step but additional low-frequency spectrum may be needed.

As highlighted in the Analysys Mason study on the Digital Agenda presented at the ETNO/ Total Telecom Regulatory Summit on May 30, demand is a major driver for NGA deployment and so public policy should be devoted to increasing the actual take-up, expanding coverage in NGA white areas and reducing costs linked to civil works. To this end, public campaigns to raise awareness of the benefits of NGA and commercial flexibility for operators are both important factors in encouraging future investment.

In December, ETNO broadly welcomed the new DAE priorities of the European Commission. By focusing both on a new regulatory approach for broadband networks and on better conditions for the deployment of new services, ETNO believes that the Commission addresses both the need for more investment incentives and consumer take up. Ultimately these new priorities should address the need for the EU telecoms sector to grow and become more competitive, following several years of decline in revenues. ETNO also strongly supported the European Cloud Partnership initiative in order to fully unlock the potential of cloud computing technologies to generate new growth for the EU telecoms sector and hence for Europe's digital economy as a whole.

Finally, ETNO welcomed the Commission's willingness to address the lack of ICT skills in Europe, in order to help close the digital divide, address workforce shortage and unemployment and at the same time improve Europe's competitiveness.

More information: http://www.etno.be/home/press-corner/etno-press-releases/2012/111

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MAIN ACTIVITIES of the year

2. REGULATORY ENVIRONMENT

Vice-President Kroes' announcement on July 12 of a new approach for broadband will remain the major regulatory development for 2012 and should set the foundations for the forthcoming legislative and regulatory initiatives in the months and years to come.

2.1 Next Generation Access Networks

Vice-President Kroes reiterated the need for a stable and predictable regulatory environment which encourages risky investment in next generation access networks while maintaining strong competition in the sector. The need for more pricing flexibility in order for operators to develop differentiated offers on the markets in line with consumers' needs was fully recognised.

In parallel, ETNO continued to support the Connecting Europe Facility as a financial instrument that leverages infrastructure investments, by lowering investment risks of public and private organisations. ETNO reiterated its concern to Heads of States and Governments that a reduction of the funding for telecoms infrastructure in the context of the CEF would be a missed opportunity for the sector.

More information: http://www.etno.be/home/press-corner/etno-press-releases/2012/57

ETNO also closely followed the revision of the State Aid Guidelines for broadband, with the revised Guidelines being published in December 2012. ETNO reiterated that public funding should remain complementary and should not substitute the investments of market players. Therefore, the use of public funds should be limited to those areas where commercial investments are not viable.
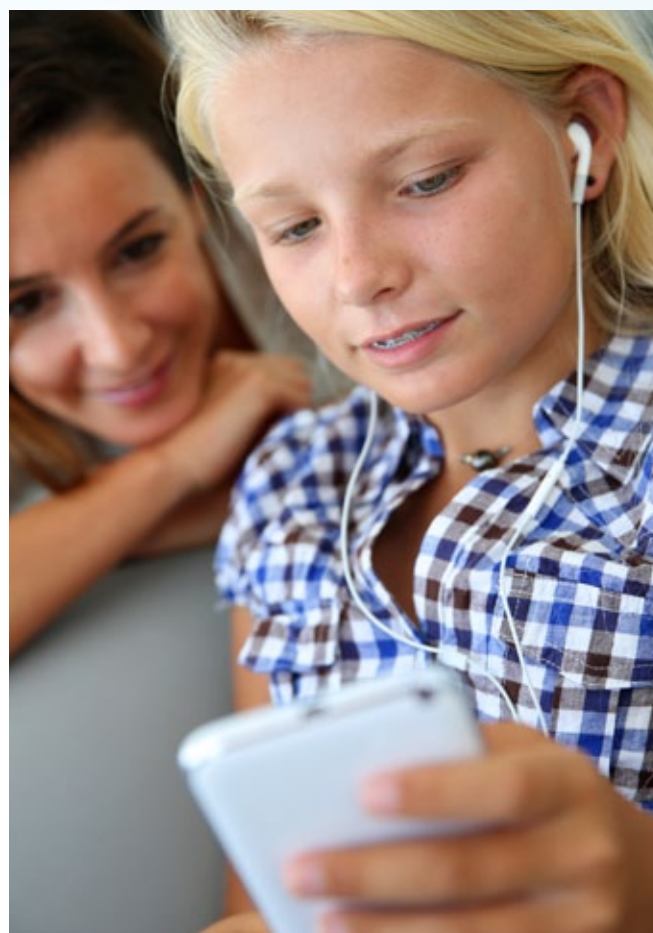
Furthermore, State Aid measures should not try to determine technology choices but rather should remain technology neutral and support the market's choice of the most appropriate and efficient technologies and services to reach the Digital Agenda targets.

More information: http://www.etno.be/home/positions-papers/2012/44

MAIN ACTIVITIES of the year

2.2 Costing

BACKGROUND:

Further to the EC consultation on costing methodologies launched in October 2011, the impact of current copper prices on investment in new high speed networks has been at the top of the political agenda and has been an underlying priority for ETNO.

ACTIVITIES:

This was the main topic of a workshop on costing organised by ETNO in February 2012. On this occasion, Brian Williamson, Plum Consulting, presented the main findings of a new report showing that reducing copper prices would unambiguously harm investment by all potential investors. It would not only hinder the achievement of the Digital Agenda goals but undermine platform competition and consumer choice.

Speaking at the ETNO-Total Telecom Regulatory Summit on May 30, representatives from the investors' community insisted on the need for a regulatory framework for high speed broadband networks. Applying a too strict cost orientation at wholesale level for high speed broadband products would prevent operators from developing differentiated retail offers.

By recognising the need for price stability, the announcement by Vice-President Kroes on a new regulatory environment for high speed broadband was largely welcomed by ETNO and the investing community.

Luigi Gambardella, Chairman of the ETNO Board declared: "*ETNO considers that today's statement will contribute to end a long period of uncertainty in the sector. Investors need a stable regulatory framework and today's announcement by VP Kroes is an important step towards building investor trust, giving valuable guidance in the light of the European Commission growth strategy for 2020.*"

The new approach also insisted on the need for more pricing flexibility and for enhanced non-discrimination.

ETNO welcomed the move away from cost orientation in those cases where platform competition and non discrimination are in place. ETNO called for the forthcoming recommendation not to introduce strict conditions in order for NRAs to have true incentives to apply a more flexible approach and therefore encourage investment.

ETNO also welcomed the launch of a consultation on the revision of the recommendation on relevant markets which identifies the markets susceptible to regulation by national regulators. ETNO insisted that the review of the recommendation should be seized as an opportunity to further implement the new approach of Vice-President and apply a more targeted regulatory approach in line with new market and technology developments as well as increased competition.

More information: http://www.etno.be/home/press-corner/etno-press-releases/2012/81

MAIN ACTIVITIES of the year

2.3 Net neutrality

BACKGROUND:

Following a Communication on the Open Internet and Net Neutrality and the BEREC report on traffic management, the European Commission launched a consultation at the end of 2012 on specific aspects of transparency, traffic management and switching to an open Internet. In 2013, the European Commission will publish its guidelines.

ACTIVITIES:

In its response to the EC consultation on transparency measures, ETNO highlighted that today's fierce competition in EU broadband markets together with proportionate and effective transparency requirements under the revised EU regulatory framework ensure that markets provide users with access to the content, services and applications of their choice. The results of a BEREC investigation in May 2012 demonstrated that only in isolated cases the market had not yet delivered this choice.

Traffic management by operators is indispensable to ensure a robust, secure and efficient functioning of their network. It is also an essential tool to support new and innovative services as well as new business models in the Internet. Operators' flexibility to develop differentiated retail offers based on consumers demand for different levels of speed, quality of delivery or volume are essential in an high speed broadband environment.

More information:
http://www.etno.be/home/positions-papers/2012/261

ETNO continued to closely cooperate with a large coalition of EU trade associations and companies in order to develop a common understanding.

2.4 BEREC

ETNO worked closely with the newly established BEREC, contributing to its various work streams.

ETNO maintained close contacts with Georg Serentschy, BEREC 2012 Chair, and with BEREC working groups and experts.

ETNO responses to BEREC consultations:

RD367 - ETNO Reflection Document on BEREC draft Medium Term Strategy Outlook
http://www.etno.be/home/positions-papers/2012/14

RD368 - ETNO contribution to the BEREC consultation on the Broadband Promotion Report
http://www.etno.be/home/positions-papers/2012/13

RD371 - Position Paper - ETNO answer to BEREC Report on Impact of Fixed-Mobile Substitution in Market Definition
http://www.etno.be/home/positions-papers/2012/10

RD373 - ETNO Response to the Draft BEREC High Level Principles on Issues of Non-Discrimination
http://www.etno.be/home/positions-papers/2012/8

RD372 - Position Paper - ETNO response on the Draft BEREC report on Co-investment and SMP in NGA networks BoR (11) 69
http://www.etno.be/home/positions-papers/2012/9

ETNO Reflection Document on BEREC 2013 WP
http://www.etno.be/home/positions-papers/2012/263

ETNO Reflection Document on "Article 28(2) Universal Service Directive: a harmonised BEREC cooperation process - Consultation paper"
http://www.etno.be/home/positions-papers/2012/267

MAIN ACTIVITIES of the year

3. SUSTAINABILITY OF THE INTERNET

BACKGROUND:

The telecommunications market and the telecoms industry as a whole are undergoing a fundamental shift. The industry is faced with rapidly increasing data traffic generated by over the top services requiring continuous investment by telecoms players in new infrastructure and bandwidth. However, today there is a huge disproportion amongst revenues and a clear shift of value towards players (Over the Top players - OTT) who are not contributing to network investment. Despite traffic increase, the revenue of the telecoms operators has been declining for three years in a row, putting at risk the operators' capacity to meet the investment challenge.

ACTIVITIES:

The disconnection between traffic and revenues is a global issue which needs a global response. This is why ETNO submitted to the ITU (International Telecommunications Union) proposals for changes to the International Telecommunications Regulations (ITRs) to be adopted at the World Conference on International Telecommunications (WCIT) in December 2012. The ETNO proposals provided for a new sustainable model for the Internet based on commercial agreements between undertakings.

The ETNO contribution proposed a number of innovative changes to selected articles of the ITRs, calling for a new IP interconnection ecosystem that provides end-to-end Quality of Service delivery, in addition to best effort delivery, enabling:

• the provision of value-added network services, to both end-customers and over the top (OTT) players and content providers, and
• a reflection of the value of traffic delivery over network infrastructures.

Moreover, the contribution also aimed to avoid any regulation which could prevent telecoms operators and OTTs from negotiating commercial agreements on end-to-end quality delivery.

The aim of the ETNO proposal was to raise awareness in general on the need for a more sustainable model for the Internet and for the principle that fair compensation is received for carried traffic.

ETNO closely participated in the preparatory process for WCIT and participated in all regional preparatory meetings of the WCIT, in order to present its proposal and raise awareness.

More information:
http://www.etno.be/news/etno/2012/51

MAIN ACTIVITIES of the year

4. PRIVACY, CYBER-CRIME AND NETWORK SECURITY

ETNO shares the Commission objective of increasing trust and confidence as one of the key conditions for users to embrace high speed broadband and hence, to achieve the targets of the Digital Agenda.

4.1 Data Protection

BACKGROUND:

In January 2012, the Commission adopted its draft Regulation on Data Protection. The main policy objectives for the Commission are to modernise the EU legal system to meet the challenges resulting from globalisation and the use of new technologies, and to strengthen individuals' rights while at the same time reducing the administrative burden on businesses. In particular, the Commission seeks to achieve better harmonisation of legislation, to ensure a consistent user experience across the EU.

ACTIVITIES:

ETNO welcomed the proposed Regulation as a significant step towards leveling the playing field among all ICT players in terms of privacy protection obligations. ETNO also welcomed the choice of a Regulation as a legal instrument to tackle the lack of harmonisation in the implementation of current data protection rules throughout the EU.

New business models responding to European users' demands often rely on innovative ways of seeking consent. Rules on consent need to be consumer-friendly, practically applicable and adapted to the online world. Repeatedly requiring explicit consent during an online experience undermines the goal of enabling consumers to make informed decisions in an environment that is not overly intrusive.

New data protection rules should not hinder the development of cloud computing services which have been recognised by the Commission as a key driver of economic growth. ETNO welcomed the positive move towards the differentiation of the roles of controller and processor and of their respective obligations. As cloud providers are mainly processors, an increase of administrative obligations upon them would have a negative effect on the success of cloud computing in Europe.

ETNO worked closely with other associations of e-communications providers, in particular ECTA, Cable Europe and GSMA, in order to develop a common understanding. Last October, ETNO and GSMA organised a joint workshop on the data protection reform from a consumer perspective.

More information:
http://www.etno.be/home/press-corner/etno-press-releases/2012/10

MAIN ACTIVITIES of the year

4.3 Fraud Control and Network Security

BACKGROUND:

In July 2012, the Commission launched a consultation in view of a new legislative proposal on network and information security, as part of the overall EU strategy on Cyber Security.

ACTIVITIES:

In its response to the EC consultation, ETNO insisted on the need for a strong and coordinated European response without unnecessary regulatory burdens on e-communications service and network providers, considering the international nature of the Internet.

In order to achieve a level playing field across all sectors, ETNO believes that all actors in the supply chain providing services of key societal and economic value should be subject to the same obligations, namely, the requirements to adopt risk management practices and to report security breaches. In addition, all participants in the ICT value chain should benefit from incentive programs to undertake measures that enhance security. Security is implemented across the full value chain of players and one weak link can destroy the whole system. Therefore, ETNO believes that there should be a level playing field established.

ETNO also believes that everyone plays a role in helping to ensure a minimum level of protection against cyber threats – Governments, business and consumers.

There is a clear need for more awareness and an understanding of Network and Information Security issues, including the need to develop a *"culture of security"* in the European Union.

End-user education and awareness are key elements to ensure that all the players and organisations involved, including the end users of the services, are more prepared and thus can potentially reduce the impact of any security incident in any of those services.

More information:
http://www.etno.be/home/positions-papers/2012/260

The ETNO Board also approved the creation of ETNO CERT TF which is a specific Task Force for the Network Security, Fraud and CyberCrime Working Group to focus on tasks related to security threats, vulnerabilities, incidents and associated counter-measures and actions. This Task Force builds on Euro 5 Security Workstream CERT activities that were initiated in 2011 through operational collaboration between CERT (Computer Emergency Response Team) & SOC (Security Operations Center) functions of five operators (Vodafone, Deutsche Telekom, France Telecom-Orange, Telefonica, and Telecom Italia). The goal of this collaboration was to enhance each operator's readiness and defense against cyber attacks in order to better protect customers from cyber threats. This Task Force is open to all SOC & Cert functions of operators who would like to participate and collaborate actively in combating cyber threats.

MAIN ACTIVITIES of the year

5. DIGITAL SINGLE MARKET/ ONLINE CONTENT

BACKGROUND:

Ensuring a truly single market for legitimate online content, as a key driver for broadband take up, has been highlighted as one of the key priorities of the Digital Agenda. There has been increasing pressure applied upon intermediaries to assess and act upon illegal content on networks and to proactively address online piracy and this debate has triggered a number of initiatives at EU level and beyond.

ACTIVITIES:

ETNO has always insisted on the need for easier access to legitimate content as the best way to fight against illegal consumption of the copyrighted content, in particular dowloading. ETNO also welcomed the increased involvement of DG CONNECT in the debate on how to adapt licensing regimes and content-related rules, such as the ones applicable to connected TV, release windows, etc. to the realities of the digital world.

In general terms, concerning Intellectual Property Rights (IPR) (protection), ETNO members fully recognize the need of a fair protection within the digital environment and specifically for rights-holders recognize the need to receive fair remuneration. However, ETNO believes that attractive legal offers and innovative business ideas would increase revenues for rights-holders while help address the issue of digital infringement of copyright. In this context, we believe that more has to be done to facilitate the emergence of innovative services and business models adapted to the new technologies, while we question the validity of measures limited to strengthening the enforcement provisions and increasing sanctions. Similarly, we consider that intermediaries and HSPs cannot be reasonably held liable for infringing activities carried out by third parties through their networks and services and that in particular they cannot reasonably replace legal authorities in assessing the legality/illegality of conduct or content that has been notified as being allegedly illegal. This would imply taking up a role and responsibilities that hosting providers cannot assume.

In the meantime, ETNO, together with other e-communications associations, took an active part in the debate on Notice and Take Down and responded to the EC consultation launched in September 2012.

ETNO questioned the need for a horizontal approach considering the differences that exist between various illegal activities and behaviour types online. ETNO considers that the Commission should better focus its efforts on fostering the voluntary adoption and improvement of Notice and Action mechanisms already implemented by EU intermediaries and, if necessary, guidelines may be issued aimed at interpreting those provisions which still raise uncertainties and result in substantially fragmented approaches. However, the EU Commission is considering to formally propose a N&A measure, be it in the form of a Recommendation or a Directive, by the Summer break.

MAIN ACTIVITIES of the year

ETNO strongly believes that the e-Commerce Directive already contains sufficiently specific and clear provisions on intermediary liability and therefore a legislative revision would not be justified. In any case, guidelines on Notice and Action should comply with the spirit of the e-Commerce Directive spirit and any new measure – also of a soft law nature - should be proportionate, taking into account the interests of the different stakeholders and the objective, which may vary depending upon the illegal activity at stake.

Any Notice and Action procedure should be limited to hosting and should provide different safeguards for different types of content. ETNO does not support Notice and Action aimed at imposing generalized mandatory web blocking and network filtering.

More information:
http://www.etno.be/home/positions-papers/2012/154

ETNO closely follows and actively participates to the debate on how to develop the European digital market. In this framework, "We believe that any intention to adopt a horizontal approach when proposing a measure on Notice and Action raises serious concerns (in particular when not accompanied by measures aimed at improving the availability of legal offer) as one has to consider the differences that exist between various illegal activities and behaviour types online. The Commission should focus its efforts on fostering the voluntary adoption and improvement of N&A mechanisms already implemented by EU intermediaries and, if necessary, guidelines may be issued aimed at interpreting those provisions which still raise uncertainties and result in substantially fragmented approaches. Differently, ETNO strongly believes that any revision of the e-Commerce Directive would be justified since it already contains sufficiently specific and clear provisions on intermediary liability (and therefore a legislative revision would not be justified.).

Concerning the debate on the private copy levy, ETNO considers that the objective of the levy is to compensate rights-holders for a licit copy; it is not a tool for indemnifying for a illegal activity such as online piracy, for which other legislative and procedural tools are effectively in place. It is not a tax aimed at pursuing social objectives. Its scope is strictly related to private use and should not be applied to products aimed at professional use. Private copy levies should not cover activities which do not relate to private copy, such as streaming and/or legal downloading, for which the copyright has already been paid.

As already mentioned, ETNO recognises the importance for rights holders to be properly compensated for their creative works and supports the private copy levy as a fundamental exception to the exclusive reproduction right. However, ETNO believes that the current system of copyright levies is no longer and fully adapted to the fast evolving European Information environment." In this regard, ETNO is carefully evaluating the implications of the recent Report drafted by the former Commissioner Vitorino.

The current copyright framework needs to be adapted to the new digital environment in order to allow players to develop new added value services to the advantage of EU consumers. The reform of copyright has to be seen in the context of the Digital Agenda goals and the single market for telecoms. ETNO supports DG CONNECT's involvement in the debate on copyright and its willingness to ensure that the copyright systems and licenses are adapted to the realities of the online world and to the creation of a single digital market for telecoms services in the EU. Easing access to content through a reform of the copyright systems and licences is essential to encourage the development of legal offers and stimulate consumer take up of high speed broadband, in line with the DAE objectives. Any reform should address the current fragmentation of copyright systems across the EU, hampering the development of pan-European offers, and should adapt licences and windows of release to the needs of online world.

MAIN ACTIVITIES of the year

6. TAX ISSUES

In 2012, ETNO Tax Issues Working Group strengthened its cooperation in the field of taxation with GSMA Europe. Within the framework of this cooperation, a joint Tax Policy Committee was set up by ETNO together with GSMA Europe. This new Committee represents the large majority of telecommunications operators across Europe, and this circumstance is highly beneficial for the relationships with EU institutions.

Within the above-mentioned Committee, ETNO continued to closely follow the implementation of the new EU Value Added Tax (VAT) package which finally entered into force on January 1, 2010 and in particular as regards the new B2C 2015 VAT place of supply rules for telecommunications services. ETNO worked closely with the European Commission, and in parallel with the Member States Tax Authorities in order to find a practical solution as the new rules will have a big impact on telecommunications businesses, resulting in important costs and administrative burdens, in addition to possible, marketing and commercial implications (e.g., pricing issues). In broad terms, telecommunications B2C services will be subject to VAT in the country of the (consumer) user's residence instead of the country of the telecommunications operator, creating an unworkable situation and/or irresolvable problems (unless, as mentioned, a workable and practical solution is achieved) in relation to a non-domestic customer base and the small amount of revenue from individuals resident in another Member State (much less than 1 %).

- RD363 - ETNO Reflection Document -
  on new Business to Consumers 2015 place-of-supply VAT rules for telecommunications services
  http://www.etno.be/Default.aspx?tabid=2448

In addition, the ETNO Tax Issues WG closely followed the discussions – at the EU level – concerning the European Commission Proposal for a Council Directive on the common system of VAT, as regards the treatment of vouchers (the topic is highly relevant for telecommunications industry, due to the large usage of prepaid vouchers for the rendering of the service).

In 2012, the ETNO/GSMA Tax Policy Committee (through its two Chairs) was admitted as a member of the VAT Expert Group (VEG).

The VEG has been incorporate by the EU Commission in 2012 with the task to:

1. advise the Commission on the preparation of legislative acts and other policy initiatives in the field of VAT;

2. provide insight concerning the practical implementation of legislative acts and other EU policy initiatives in the field of VAT.

MAIN ACTIVITIES of the year

7. FAIR MANAGEMENT OF RESOURCES

7.1 Spectrum

Following the adoption in December 2011 by the EU's Council of Telecoms Ministers of the first Radio Spectrum Policy Programme for 2012-2015 (RSPP), ETNO closely followed its implementation. ETNO continued to push for a harmonised release of the 800 MHz band (the Digital Dividend) for electronic communications services by 1 January 2013 across the EU will help to provide broadband and social inclusion in all European Member States and stimulate economic growth and competitiveness within the EU.

ETNO also followed the World Radiocommunications Conference 2012 (WRC-12). ETNO stated the need for new frequency bands to be looked for in the next years and to be confirmed by the next WRC-15, in 2015. The growth of mobile broadband connections of the last years is even increased in the near-term and the risk of spectrum congestion can be only avoided with new frequency bands identified for IMT and better spectral efficiency provided by the new technologies (LTE).

7.2 Naming, Addressing and Numbering

ETNO provided representation and input in international bodies dealing with Internet naming and addressing issues, like ICANN and RIPE. The exhaustion of IPv4 addresses and the new gTLDs extension program remained as key issues for ETNO's Naming, Addressing and Numbering working group. ETNO followed closely a number of numbering aspects deriving from the revision of the EU Regulatory Framework, such as number portability, location information for emergency services, ETNS. ETNO also followed closely issues being dealt with by ITU-T SG2 and CEPT ECC WG NaN.

ETNO also closely followed the work of CEPT regarding number portability. ETNO warned against a one size fits all solution for all possible aspects (such as routing principles, quarantine, porting time etc.) where it should rather focus on the Number Portability objectives. Obligations should not go beyond the EU Directives.

More information:
http://www.etno.be/home/positions-papers/2012/12

ETNO also contributed to the CEPT Green Paper on the long term evolution in naming, numbering and addressing. ETNO very much welcomed the statement that "efficient and effective regulations in the area of numbering, naming and addressing are only possible after a detailed and well informed dialogue with all the involved stakeholders…"

ETNO insisted on the need to keep stability in the numbering plans. Any unnecessary change should be avoided as it would have a significant impact on end-users' behaviour, end-user equipment and operator networks. Any change in the numbering plan should therefore be based on a stable long term vision.

More information:
http://www.etno.be/home/positions-papers/2012/4

MAIN ACTIVITIES of the year

ETNO participated in the CEPT/ECC (Electronic Communications Committee) work on numbering for VoIP services. As a general remark, VoIP service providers that get numbers from the National Numbering Plans have to be duly authorised by the National Regulators and satisfy all the obligations related to the geographic number ranges from which they get numbers (such as Number Portability, Emergency Calls and Caller Location determination, Legal Intercept, link with used public network access, etc.), in exactly the same way as all the other service providers getting numbers from the same ranges. The allocation of mobile numbers will inevitably have an impact on the interface with the relevant authorities in charge of those aspects.

The evolution of the traditional voice networks towards VoIP should be taken into account when considering this Recommendation. In addition, there will be fairness in the market place between all the service providers, because the same obligations will be applicable to the same number ranges.

Finally, a specific numbering space that is dedicated to the international or national nomadic services is, in principle, the most suitable choice for general end user protection (tariff transparency, etc.), as well as operator and voice calls traceability, legal interception. etc.

More information:
http://www.etno.be/home/positions-papers/2012/266

ETNO also contributed in ECC recommendations on Number Portability Best Practices.

ETNO is generally supportive of the directions put forward in the draft document but has concerns about the additional operational and technical impacts that some of the proposed recommendations may impose.

In particular, ETNO does not consider that whilst a single general framework may have its merits, it is necessary to go as far as mandating a particular method or time value and therefore ETNO proposes to focus on the essential objectives for number portability rather than to define detailed solutions that might go beyond the current European regulation.

More information:
http://etno.be/home/positions-papers/2012/12

ETNO also participated in ECC work, Report 178 "Open and Closed Dialing Plans".

ETNO wants to stress that the closing of the dialing plan and the removal of the geographic significance of numbers are two unrelated concepts.

ETNO is not convinced that the removal of the geographic significance of numbers is necessarily required when choosing a closed numbering. Geographic numbers deprived of their meaning, either related to tariffs or to the physical location of the called user, are numbers with less value and less ease of use for the calling users. Such an evolution has a strong technical impact and a cost – benefit analysis is needed before such an evolution could take place.

More information:
http://etno.be/home/positions-papers/2012/11

MAIN ACTIVITIES of the year

8. RESEARCH AND INNOVATION

The European Commission agenda on Research and Innovation was particularly busy in 2012. The Commission progressed on the definition of Horizon 2020 as well as called for projects under PPP FI call 2 and FP7 Call 9 & 10. The ETNO Working group has been very active in relation to these different matters.

The WG developed contributions on WP 2013 and Horizon 2020 to ensure that the topics essential to TNOs are included in those programmes.

- ETNO R&I WG sent comments and remarks on WP2103 to the Director of NetFuture at DG connect (May 2012).
- ETNO R&I WG Chair met the Director of NetFuture at DG connect to exchange on ongoing subjects : the PPP Future Internet, the WP2013 and a possible PPP in Horizon 20 20. (May 2012).
- ETNO R&I WG responded to the consultation on Future Network Technologies Research and Innovation in HORIZON2020. (June 2012)
- ETNO R&I WG chair was invited to the "ICT Competitiveness Week" to present TNOs priorities for Horizon 2020. (September 2012)
- ETNO R&I WG contributed to the CEO Statement (2nd October), supporting the Commission's R&D package for the period 2014 to 2020 and calling for an industrial initiative to prepare the next generation of Networks and Information Systems (October 2012)

The WG monitored also the ETNO proposals in FP7 call-9 (April 2012), PPP FI call 2 (24 October 2012), FP7 call 10 (January 2013).

9. BENCHMARKING

The Benchmarking Working Group provided a platform to exchange quantitative and qualitative information, and ultimately best practices on common topics between its members. All studies are about non-competitive content. If required, the benchmark data collection process is performed in a "blinded" mode in order to cover source and origin. Benchmark results are shared among the study participants. During 2012 the BEN WG addressed various benchmarking topics based on the initiative of its most active WG members.

In case there is sufficient interest to launch several studies on the same domain, a so-called Special Interest Group (SIG) can be formed in order to gather experts from this domain. After a first SIG on access networks launched in 2008, another SIG on Customer Experience has been formed in 2012, as this domain is of common interest among the telecom operators.

Most recent studies focused on Directory assistance services, customer segmentation and customer lifecycle experience.

MAIN ACTIVITIES of the year

10. GLOBAL DIMENSION

10.1 External trade issues

ETNO has been closely monitoring the European Commission continued negotiations on bilateral Free Trade Agreements – which all include chapters on telecoms and aim at opening up markets beyond what is foreseen in WTO telecoms agreements.

In this context, ETNO has adopted a position on the need to modernise the scope of the telecommunications chapter on EU trade agreements.

The latest technology developments and changes in the value chain of the telecommunications sector make it necessary to take an updated and modern approach to market access in converged market segments. "Convergence" is increasingly blurring the boundaries between traditional telecommunications and audiovisual services, favouring the emergence of package offerings which combine voice, Internet and the delivery of audiovisual content.

More information:
http://www.etno.be/home/positions-papers/2012/7

ETNO also actively participated in DG Trade's Public Consultation on regulatory issues for a possible future EU-US trade agreement. ETNO believes that a holistic vision with a common understanding of the ICTs ecosystem should be an objective for the EU and US Administrations and should be reflected in their approach towards a Free Trade Agreement to ensure a level playing field among all actors involved in the provision of ICT services. As competitive dynamics change with the entrance of new players, the goal of ensuring open markets for ICT services across the Atlantic should come in parallel with a more flexible approach towards the provision of telecommunications services, a stronger reliance on expost application of principles of competition law and a broader perspective on the positions of dominance that are held across the value chain.

More information:
http://www.etno.be/home/positions-papers/2012/265.

MAIN ACTIVITIES of the year

10.2 The ITU

ITU related activities within ETNO were focused on the preparation of two of the Word Conferences: the World Telecommunication Standardisation Assembly (WTSA-12) and the World Conference on International Telecommunications (WCIT-12).

With the help of the ITU Working Group, reestablished in June, ETNO members made an analysis of all the proposals for the revision of the International Telecommunications rules (ITRS).impacting operators activities (e.g. roaming, taxation, security, quality of service, misuse and/or misappropriation of numbering resources –e.g. spam, phishing and malware-). Members developed some common principles for the new ITRs, which were in particular expressed in the European preparatory process. ETNO also submitted a proposal related to IP interconnection.

Regarding standardisation activities and WTSA preparation, ETNO members' views were focused on specific ITU-T activities, with proposals related to the restructuring of the study groups, handling of Internet related issues, the assessment of some ITU-T programs (conformance, interoperability, testing), and, as usual the improvement of ITU-T working methods.

10.3 Internet Governance

ETNO has continued to actively monitor developments in the Internet Governance world, tracking ICANN, WSIS (World Summit on Information Society), EuroDIG (European Dialogue on Internet Governance) and IGF (Internet Governance Forum) / IGF-related activities and events. ETNO actively participated in the Internet Governance Forum in Baku, intervening on critical infrastructure and broadband for consumers.

MAIN ACTIVITIES of the year

11. SOCIALLY RESPONSIBLE MANAGEMENT

11.1 Corporate Responsibility

ETNO published its latest Sustainability Report, measuring the evolution of the signatories of the ETNO Sustainability Charter Signatories. In his foreword to the report, Paul Timmers, DG CONNECT Director for Sustainable and Secure Society said: "*The recent boom in the deployment of networks, cloud computing services and the increasingly digitalised society places the members of ETNO in a key position. They not only contribute to improving resource use and reducing carbon emissions across the EU, but at the same time they contribute to creating avenues for innovation and growth. In other words the sector has a central role to play in driving Europe's sustainable future.*"

The report shows that despite an increase in electricity consumption, CO_2 emissions by network operators have continued to decrease. Overall CO_2 emissions have reduced by 4% in 2010. Significant improvements are also observed in waste recycling.

In 2012, ETNO also unveiled its new Corporate Responsibility Charter resulting in an extension of the scope of the commitments to embrace new challenges such as online child protection, human rights and the supply chain involvement.

ETNO also actively followed the adoption of a CSR communications and the possible creation of an ICT-specific CSR platform. ETNO insisted on the need for more coordination and exchange of best practices.

The ETNO Energy Task Force, whose activity is focused on encouraging maximum efforts and identifying advanced technical solutions aimed at improving environmental performance with relation to energy production and consumption, has been particularly active in the evaluation of new concepts for the efficiency of data centers such as High Voltage DC, extension of temperature ranges and new cooling concepts, and new solutions for further reducing power consumption of customer premise equipment such as routers and setup boxes. The annual report 2012 of the ETF will be published in the first half of 2013.

Via its Online Child Protection Task Force, ETNO has also been working specifically to identify and analyse potential risks and to look at solutions by sharing practices and experiences among its member companies, and has contributed actively to the development and promotion of the High-Level joint industry Principles for the Safer Use of Connected Devices and Online Services by Children and Young People in the EU.

Download the report

Download the report

MAIN ACTIVITIES of the year

11.2 Social Dialogue

One of the initiatives of the Europe 2020 strategy is an agenda for new skills and jobs which aims at equipping people with the right skills for the jobs of today and tomorrow.

During 2011, ETNO's Employment Health & Safety Working Group worked on this issue with UNI to define the content for a possible new project dealing with skills & training. The project's objective would be to map the ICT qualification landscape and identify the main opportunities linked to the evolution of the ICT sector in order to assess the need and possibility of a future ICT skills council. The project should lead to the provision of high quality labour market information and enable the project partners to create a network with the relevant

stakeholders, such as education and training providers, national and regional observatories and public authorities at national, regional or local level. The exchange with these stakeholders should aim at developing effective solutions for filling the skills gap in the future.

ETNO's Employment Health & Safety Working Group jointly with UNI has organised the collection of answers of ETNO members concerning the GWGH impact assessment, one year after the successful conference of October 2010. A report of this impact assessment will be sent to the EC in 2012, analysing the impact of the GWGH project and dissemination of the best practice guidelines.
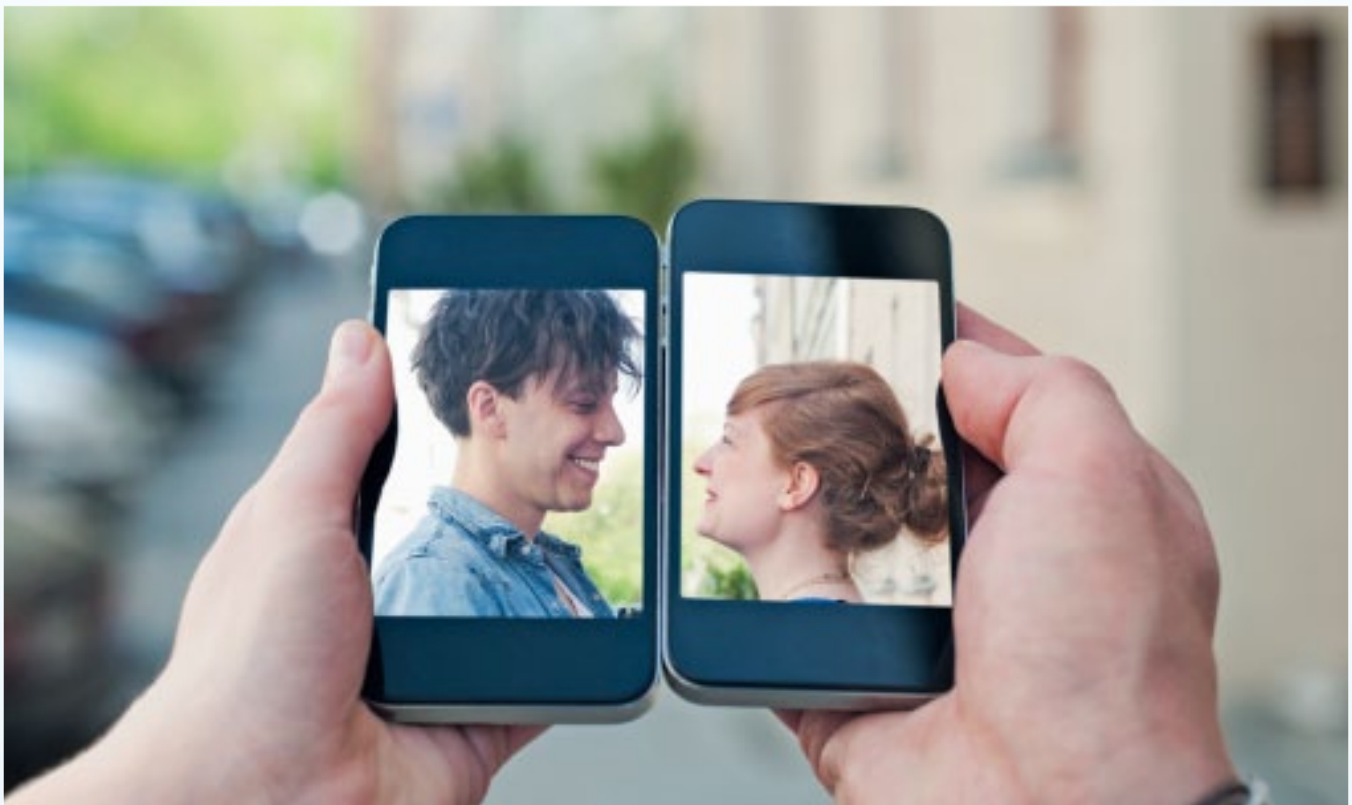
ETNO INTERVENTIONS
in external conferences

- Beirut, 2-3 February 2012
    11TH Arab Telecoms and Internet Forum

- Munich, 16 February 2012
    FTTH Council Europe Conference

- Barcelona, 27 February 2012
    Huawei "Broader Way Forum" Conference

- Moscow, 25 April 2012
    2nd International Forum on future of Telco's Business models

- Brussels, 3-4 May 2012
    Smart Energy and Sustainable ICT conference

- Brussels, 21 June 2012
    Digital Assembly, high speed connections workshop

- Panama, 17-19 July 2012
    ITU Connect Americas Summit

- Salzburg, 27-28 August 2012
    13th Telecom Forum hosted at Salzburg University, with the support of RTR, the Austrian Regulator

- Brussels, 12 September 2012
    WIK Conference

- Brussels, 13 September 2012
    ICT conference for Europe's economic growth

- New York, September 24 2012
    Columbia University Conference

- Brussels, 27 November 2012
    ECTA Annual Conference

- Moscow, 5 December 2012
    Telecoms Loyalty and Churn

ETNO POSITIONS 2012

- 16 NOVEMBER, 2012

ETNO Reflection Document on "Article 28(2) Universal Service Directive: a harmonised BEREC cooperation process - Consultation paper"

The Association of European Telecommunications Network Operators (ETNO) would like to thank BEREC for the opportunity to participate in the Consultation on "Article 28(2) Universal Service Directive: A harmonised BEREC cooperation process".

The proposed BEREC cooperation mainly with the NRAs process has been thoroughly analyzed, and, since it mainly relates to regulatory and legal issues inside NRA legal roles and powers, additional suggestions are possibly outside the operators' scope

MORE… CLIC HERE

- 12 NOVEMBER, 2012

ETNO Reflection Document on "Draft ECC Recommendation 12(04): Numbering for VoIP Services"

The Association of European Telecommunications Network Operators (ETNO)[1] would like to thank the CEPT/ECC (Electronic Communications Committee) for the opportunity to comment on Draft ECC Recommendation 12(04) "Numbering for VoIP Services".

MORE… CLIC HERE

[1] The European Telecommunications Network Operators' Association (ETNO) is representing 38 major companies, which provide electronic communications networks over fixed, mobile or personal communications systems in 35 countries. ETNO is Europe's leading trade association. More information about ETNO can be found at: www.etno.eu

- 31 OCTOBER, 2012

Response to DG Trade's Public Consultation on regulatory issues for a possible future EU-US trade agreement

There is a wide consensus that Information and Communication Technologies (ICTs) are a key driver of economic growth on account of their multiplier effect across all sectors of the economy, providing the foundation for global competitiveness and job creation in manufacturing, agriculture and services. ICTs have experienced a radical transformation in the last decade with the development of the Internet as a common platform where convergent voice, data and video services are provided by a range of actors running on top of traditional network operators and not subject to the same legacy regulations.

ETNO believes that a holistic vision with a common understanding of the ICTs ecosystem should be an objective for the EU and US Administrations and should be reflected in their approach towards a Free Trade Agreement to ensure a level playing field among all actors involved in the provision of ICT services. As competitive dynamics change with the entrance of new players, the goal of ensuring open markets for ICT services across the Atlantic should come in parallel with a more flexible approach towards the provision of telecommunications services, a stronger reliance on ex-post application of principles of competition law and a broader perspective on the positions of dominance that are held across the value chain.

MORE… CLIC HERE

ETNO POSITIONS 2012

• 30 OCTOBER, 2012

ETNO Reflection Document: ECC WG NaN Green Paper - Long Term Evolution in Numbering, Naming and Addressing 2012-2022

The Association of European Telecommunications Network Operators (ETNO)[1] would like to thank the CEPT/ECC (Electronic Communications Committee) WG NaN (Working Group Numbering and Networks) for the opportunity to comment on the Draft Final of Green Paper on "Long Term Evolution in Numbering, Naming and Addressing: 2012 – 2022".

ETNO appreciates the difficulty of the task undertaken by the WG NaN to outline potential evolutions of a complex and multi-dimensional area ten years ahead in an environment as diverse as the 48 CEPT countries. In response, this paper merely intends to provide comments on the Green Paper for further discussions and related workshops; it does not have the ambition of setting out ETNO's perspective on that same evolution.

On a general note, ETNO also observes that the introduction of the paper emphasises a potential trend for E.164 numbers to be used chiefly as 'names' within ten years. Whilst ETNO understands (and endorses) the growing importance of IP-based technologies (and addresses) and social media addressing schemes, we would note that as far as numbering plan evolutions are concerned, most current evolutions under study on national or international numbering plans for the next five years are related to the use of phone numbers as "addresses", which may be seen as being in contradiction with this long term vision.

That vision seems also to argue for a gradual disappearance of "service numbers" like short numbers. This is not consistent with the current approach of harmonisation.

MORE… CLIC HERE

[1] The European Telecommunications Network Operators' Association (ETNO) is representing 41 major companies, which provide electronic communications networks over fixed, mobile or personal communications systems in 35 countries. ETNO is Europe's leading trade association. More information about ETNO can be found at: www.etno.eu

• 29 OCTOBER, 2012

ETNO Reflection Document on BEREC 2013 WP

ETNO's 40 telecoms members are making long-term investments in the broadband networks of the future in order to help boost competitiveness, foster development of the Internal Market and benefit EU consumers and businesses. Europe's electronic communications industry is a key enabler of smart and sustainable growth and it is important to ensure that the appropriate regulatory environment is in place in order to ensure continued investment during difficult economic times.

MORE… CLIC HERE

• 19 OCTOBER, 2012

ETNO response to BEREC draft CP on best practice in remedies on markets 4, 5 and 6; BoR (12) 104, BoR (12) 88, BoR 12 (83)

ETNO takes the opportunity to comment on the present draft BEREC Common Positions on best practice remedies on markets 4, 5 and 6.

MORE… CLIC HERE

• 16 OCTOBER, 2012

ETNO response to the Commission Public Consultation on specific aspects of transparency, traffic management and switching in an open Internet

ETNO welcomes the present consultation. ETNO members provide access to the Internet over more than 300 millions broadband connections (fixed and mobile) in the 27 EU Member States and beyond, making ETNO companies a guarantor of an open, accessible and sustainable Internet ecosystem.

MORE… CLIC HERE

ETNO POSITIONS 2012

• 15 OCTOBER, 2012

ETNO Expert Contribution on the European Commission Consultation "Improving Network and Information Security (NIS) in the EU"

With a view to the forthcoming EU Strategy on Cyber-security, expected by end 2012, the Commission has launched this public consultation on "Improving Network and Information Security (NIS) in the EU" in order to gather input from interested stakeholders.

MORE… CLIC HERE

• 27 SEPTEMBER, 2012

ETNOC01 - DSM - Notice and Action Consultation Sep 2012

"A clean and open Internet: Public consultation on procedures for notifying and acting on illegal content hosted by online intermediaries"

This is the ETNO full and official response to the Commission's consultation on Notice & Action.

MORE… CLIC HERE

• 27 SEPTEMBER, 2012

ETNOC02 - ETI - ETNO Contribution DG trade cons

ETNO Response to DG Trade's Public consultation on the future of EU-US trade and economic relations

This position paper is ETNO's contribution to DG Trade's Public Consultation on the future of EU-US trade and economic relations. It stresses some aspects of the ETNO contribution to the EU-US High level Working Group on Jobs and Growth consultation (April 2012).

MORE… CLIC HERE

• 04 SEPTEMBER, 2012

RD384 - ETNO Response to [Draft] EU Guidelines for the Application of State Aid Rules in Relation to the Rapid Deployment of Broadband Networks

o ETNO supports the Commission's recently announced new policy / regulatory approach for the broadband investment environment and believes that the revision of the State aid Guidelines for broadband networks should take due account of these new objectives.

o ETNO agrees with the European Commission's cornerstone principle that public funding should remain complementary and should not substitute the investments of market players.

o State aid measures should not try to determine technology choices but rather should remain technology neutral and support the market's choice of the most appropriate and efficient technologies and services to reach the Digital Agenda targets.

MORE… CLIC HERE

• 13 JUNE, 2012

RD379 - WTO Review of the Information Technology Agreement

The ITA needs a revision and ETNO supports such evolution. ETNO members welcome an ITA expansion. ETNO's position is to recommend the start of negotiations promptly, with a view to rapid conclusion and implementation.

MORE… CLIC HERE

• 05 JUNE, 2012

RD378 - ETNO Response to Mediation Process Concerning Private Copying and Reprography Levies

ETNO welcomes the opportunity to contribute to the debate launched on how to tackle the existence of disparate levy systems throughout Europe and the need to adapt the functioning and scope of the levies in the today's fast evolving digital environment.

Any modification in the regulatory framework should be aimed at fostering, and not hampering, the development of innovative services and facilitating their use by the users.

MORE… CLIC HERE

ETNO POSITIONS 2012

• 05 JUNE, 2012

RD377 - ECC WG NaN Green Paper - Long Term Evolution in Numbering, Naming and Addressing 2012-2022

ETNO would like to thank the CEPT/ECC (Electronic Communications Committee) WG NaN (Working Group Numbering and Networks) for the opportunity to comment on the Green Paper on "Long Term Evolution in Numbering, Naming and Addressing: 2012 – 2022".

ETNO very much welcomes the statement that "efficient and effective regulations in the area of numbering, naming and addressing are only possible after a detailed and well informed dialogue with all the involved stakeholders…"

MORE… CLIC HERE

• 01 MAY, 2012

RD376 - ETNO Comments on the EC Proposal for a General Data Protection Regulation (GDPR)

ETNO welcomes the European Commission's commitment to maintaining Europe's high standards in the protection of personal data while at the same time ensuring better harmonization throughout the EU and achievement of a fully internal market.

The latter objective can only be reached via a Regulation and therefore ETNO fully supports the choice of this legal instrument.

MORE… CLIC HERE

• 01 APRIL, 2012

RD375 -ETNO Contribution to Public Consultation on EU – US High Level Working Group on Jobs and Growth

At the EU-US Summit meeting of 28th November 2011, leaders directed the Transatlantic Economic Council to establish a High-Level Working Group on Jobs and Growth, led by the US Trade Representative and EU Trade Commissioner. This Working Group is tasked to identify policies and measures to increase EU-US trade and investment to support mutually beneficial job creation, economic growth, and international competitiveness.

MORE… CLIC HERE

• 01 APRIL, 2012

RD374 - Modernizing the scope of the telecommunications chapter on EU trade agreements: addressing the convergence between telecommunication services and the transmission of audiovisual services

This position paper highlights the rationale behind adapting the current scope of the chapters on telecommunications services relating to the trade agreements that the EU Commission is negotiating with third countries.

MORE… CLIC HERE

• 09 MARCH, 2012

RD372 - Position Paper - ETNO response on the Draft BEREC report on Co-investment and SMP in NGA networks BoR (11) 69

ETNO welcomes the present consultation on a draft report on co-investment and significant market power. We encourage BEREC to in particular reflect the following elements in its final report.

MORE… CLIC HERE

• 01 MARCH, 2012

RD 373 - ETNO Response to the Draft BEREC High Level Principles on Issues of Non-Discrimination

ETNO welcomes the consultation launched by BEREC on the high level principles associated with non-discrimination. This is a matter of great impact and importance to ETNO members and ETNO hereby submits answers to the questions that are of concern to the association.

MORE… CLIC HERE

ETNO POSITIONS 2012

- 13 FEBRUARY, 2012

RD371 - Position Paper - ETNO answer to BEREC Report on Impact of Fixed-Mobile Substitution in Market Definition

ETNO shares BEREC's analysis that the degree of fixed-mobile substitution varies considerably between member states. Overall, fixed-mobile substitution effects are becoming more relevant and, where present, should lead to a reconsideration of current obligations imposed on fixed network operators.

MORE… CLIC HERE

- 09 FEBRUARY, 2012

RD370 - ETNO Reflection Document - Comments on Draft ECC Report 178 "Open and Closed Dialling Plans"

ETNO would like to thank the Electronic Communications Committee (ECC) for the opportunity to comment on the Draft ECC Report 178 "Open and Closed Dialling Plans" and considers that the report offers a very valuable and useful viewpoint on the issue of closed/open dialling plans.

MORE… CLIC HERE

- 09 FEBRUARY, 2012

RD369 - ETNO Reflection Document - Comments on ECC Recommendation (12)02 "Number Portability – Best Practices"

ETNO would like to thank the Electronic Communications Committee (ECC) for the opportunity to comment on the proposed recommendations on Number Portability Best Practices.

MORE… CLIC HERE

- 23 JANUARY, 2012

RD368 - ETNO contribution to the BEREC consultation on the Broadband Promotion Report

ETNO calls for the development of regulatory policies that take into account the high costs needed to develop high speed broadband both on the copper network (e.g. VDSL) and on fibre infrastructures.

MORE… CLIC HERE

- 16 JANUARY, 2012

RD367 - ETNO Reflection Document on BEREC draft Medium Term Strategy Outlook

ETNO welcomes BEREC's initiative to provide a mid-term strategic outlook on its priorities. It reflects BEREC's increasingly important role in ensuring a consistent and proportionate regulatory regime in the EU.

MORE… CLIC HERE

- 06 JANUARY, 2012

RD366- ETNO Reflection Document - ETI ETNO comments FCC on Foreign ownership

On October 21st, the Federal Communications Commission published in the US Federal Register a Notice of Proposed Rulemaking (NPRM) in which it seeks comments by December 5th 2011 (with possible extension) on the procedures it has applied over many years when scrutinising foreign investments in wireless spectrum licences.

MORE… CLIC HERE

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