

**International Roaming
BEREC Benchmark Data Report
October 2013 – March 2014**

25 September 2014

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Introduction

This BEREC Benchmark Report on International Roaming (the “Report”) presents the results of the 13th round of data collection on European international roaming services undertaken by the Body of European Regulators for Electronic Communications (BEREC). The Report covers the period 1 October 2013 – 31 March 2014, i.e. quarters 4 for 2013 and 1 for 2014. The Report also includes data from previous rounds of data collection conducted by BEREC and its predecessor, the European Regulators Group (ERG), to provide context for the current figures. The earliest data is from quarter 2nd 2007, when the Roaming Regulation was about to enter into force.

The applicable regulatory framework for this data collection is the Roaming Regulation (EU) No 531/2012 (Third Roaming Regulation) applied in the EU (European Union) and the EEA EFTA countries¹, with requirements for retail and wholesale regulated tariffs for voice, SMS and data roaming. In addition, Switzerland contributed to the data collections, although the 2007, 2009 and 2012 Roaming Regulation is not applicable there².

BEREC is required regularly to collect data from national regulatory authorities on the development of retail and wholesale charges for voice, SMS and data roaming services and to notify those data to the Commission under the Roaming Regulation – Article 19 paragraph 4.

BEREC believes that the information collected in existing and subsequent reports provides a sound basis for any decisions regarding future regulation. In addition, BEREC considers it important to collect and publish a wider range of information in order to give a better picture of the effect of the EU Roaming Regulation and to present the evolution of roaming services.

While the monitoring obligations are addressed to individual NRAs, BEREC considers that it can add value by pursuing the following objectives:

- Simplifying the process, not only for NRAs as BEREC acts as a central point for the data collection, but also for the Commission, as the data is received from a single source and, following data processing;
- Coordinating the actions of individual NRAs, as the data collection exercise uses a single and commonly agreed data collection model, and the process is synchronised and based on the same collection periods. BEREC consults the market players and the Commission before finalising the data collection templates;
- As far as possible, providing a common response to the different questions posed during the collection process by operators and NRAs, as BEREC serves as the forum where these questions are commonly debated and addressed.

¹ For the purposes of this Report, ‘EEA EFTA’ (European Economic Area, European Free Trade Association) refers to Liechtenstein, Norway and Iceland.

² Figures from Switzerland are excluded from both “EEA” and “EEA EFTA” averages.

Regulatory evolution

The European Regulators Group (ERG) initially worked on the long-standing issue of high prices for international roaming services. Following its creation in January 2010, the Body of European Regulators in Electronic Communications (BEREC) has taken over responsibility for this work from ERG.

The 2007 Regulation

In 2005, ERG undertook a study of international roaming that concluded that the EC Regulatory Framework did not provide the necessary tool-kit for NRAs to tackle the problems identified. ERG wrote to the Commission in December 2005 highlighting its concerns.

After significant debate, the first Regulation on international roaming services was published on 29 June 2007. The primary provisions capped wholesale and retail charges voice calls for the Eurotariff and set a number of transparency provisions to help to ensure that consumers were well informed. The provisions of the Regulation entered into force at different times, with retail and transparency provisions taking full effect by the end of September 2007 and wholesale provisions calculated annually from the end of August 2007³.

The 2009 amended Regulation

On 7 May 2008, the Commission launched a public consultation on the functioning of the 2007 Regulation. ERG's views expressed in response to the consultation were substantially reflected in the Commission's legislative proposals,⁴ published on 23 September 2008, to extend the 2007 Regulation in duration and scope.

On 22 April 2009, the European Parliament adopted Regulation (EC) No 544/2009 at first reading, with a view to amending Regulation (EC) No 717/2007. Subsequently, on 8 June 2009, the Council of EU Telecoms Ministers formally adopted the new EU roaming rules approved by the European Parliament. The definitive text of Regulation (EC) No 544/2009 was published in the Official Journal of the European Union on 29 June 2009^{5,6}.

In particular, the Regulation introduced the following measures related to price control, applicable from 1 July 2009 to 30 June 2012:

- an extension of wholesale and retail price regulation for voice, with yearly decreases in the levels of the caps;
- price regulation of SMS roaming services at both the wholesale and retail levels;
- price regulation of data roaming services at the wholesale level.

And from July 2010 to June 2012:

- retail transparency measures to protect consumers from "bill shock" when data roaming.

³ In Norway and Iceland the 2007 Regulation was in force from the end of 2007 to quarter 2 2010

⁴ http://ec.europa.eu/information_society/activities/roaming/docs/regulation/reg_en.pdf

⁵ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:167:0012:0023:EN:PDF>

⁶ From quarter 3 2009 to quarter 1 2010, Regulation 544/2009 applied in the EU while the first Roaming Regulation (EC) No 717/2007 remained in force in Norway, Iceland and Liechtenstein, with slightly higher voice caps, no SMS caps and no wholesale data cap.

The 2012 Regulation

On 29 June 2010, the Commission published an interim Report⁷ on the functioning of the 2009 Regulation. The Commission's Digital Agenda for Europe⁸ also included a target for roaming, where 'the difference between roaming and national tariffs should approach zero by 2015'.

In accordance with the 2009 Regulation, BEREC provided advice to the Commission on the functioning of the Regulation and future regulatory options in its December 2010 Report⁹, supplemented by its February 2011 response to the Commission's public consultation¹⁰.

The Commission then published a full review of the functioning of the Regulation and legislative proposals for a new Regulation in July 2011¹¹.

On 30 May 2012 the Council of the European Union (EU) approved the International Roaming Regulation III¹², which entered into force on 1 July 2012¹³.

The Regulation introduced the following measures, applicable from 1 July 2012:

- an extension of wholesale and retail price regulation for voice and SMS with yearly decreases in the levels of the caps until July 2014 with those caps to remain in force until July 2022 for wholesale services and until July 2017 for the Eurotariffs subject to a further review in July 2016;
- price regulation of data roaming services at the retail level with a yearly decrease in the level of the cap until July 2014 with the cap to remain in force until July 2017 subject to a further review in July 2016;
- the obligation for MNOs to meet all reasonable requests for wholesale roaming access, which comprises direct wholesale roaming access and wholesale roaming resale access under the rules set out in the Roaming Regulation.

The Regulation also included provisions on the separate sale of roaming services which entered into force on 1 July 2014.

⁷ http://ec.europa.eu/information_society/activities/roaming/docs/interim_report2010.pdf

⁸ <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=COM:2010:0245:FIN:EN:PDF>

⁹ http://erg.eu.int/doc/berec/bor_10_58.pdf

¹⁰ http://ec.europa.eu/information_society/activities/roaming/docs/cons11/Berec.pdf

¹¹ http://ec.europa.eu/information_society/activities/roaming/index_en.htm

¹² <http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2012:172:0010:0035:EN:PDF>

¹³ With regard to the EEA EFTA countries, it must be noted that the Roaming Regulation applies in these countries as from 7 December (Norway and Liechtenstein) and 21 December (Iceland) 2012.

Methodology for data collection

ERG first consulted on a draft version of its data questionnaire during September 2007. Following comments received, ERG amended the data questionnaire sent to providers, with an accompanying Explanatory Memorandum, in October 2007.

In order to verify operators' compliance with the new Roaming III Regulation, BEREC updated the questionnaire. NRAs and the Commission have been informally consulted on subsequent revisions of the template.

The information gathered for this Report covers both retail and wholesale prices and volumes for voice, SMS and data roaming services. Each NRA aggregated individual provider data to provide a national aggregate to BEREC. Therefore, only national aggregated data appears in this Report.

Over 150 providers of international roaming services provided information for this Report. These include virtually all of the mobile network operators in the EU, as well as a significant number of MVNOs that provide EU roaming services. BEREC estimates that this covers around 95% of EU consumers using international roaming services today.

There is a limited number of operators that have some problems supplying reasonable quality data. This is not at all unusual for a comprehensive data collection of this type. In most cases the NRA was able to work with the company to resolve or alleviate the problem. In other cases, where system upgrades will be necessary to comply with the new format of the data collection, the company was asked to provide the best possible estimate currently available and to complete upgrades in time to provide high quality data in future.

The prices for the Eurotariff may exceed the price caps due to the 30 second minimum initial charging interval and in some cases non-regulated calls have been included due to problems with reporting.

Some operators had problems in making the split between EU countries and other European countries and this may affect some graphs showing the surcharge as a result of billed minutes for intra-EEA roaming voice calls.

At the wholesale level, operators often receive discounts based on variables like volume of traffic, calculated at the end of a 12-month period. When providing data for these reports, operators may estimate the effect of such discounts on data for each quarter. Because the actual discount may vary from the estimate, there may be an apparently 'anomalous' result for the quarter when the discount is actually applied. This should be kept in mind when comparing wholesale figures for different quarters in the same year.

In a few cases the number of operators changed, which may cause an apparent change in price between quarters. This can also lead to strong volume changes.

When wholesale prices are above the price caps, in most cases the reason is that the average price is an annual price and not per quarter, and in such cases some quarters compensate for other quarters. Another reason may also be inaccuracies in reporting for the data collection itself.

For ease of comparison, the Euro is used throughout this Report. Within the EU, currency fluctuations between the Euro and other national currencies are likely to have affected the average prices reported for EEA countries outside the Euro zone.

With regard to wholesale roaming resale access according to Article 3 para. 4 Roaming Regulation, MNOs may charge fair and reasonable prices for components not covered by para. 3. Thus prices may be higher than the price caps given in Article 7 para. 1. Some data also includes volumes and tariffs coming from roaming in non-EU countries in Europe. It should also be noted that the average wholesale roaming voice tariff for agreements applying Article 3 of the Roaming Regulation might be above the cap because the calculation is based on actual minutes (the Regulation permits to invoice 30 seconds for calls that are shorter). In one case annexes to contracts signed by the MNO with its MVNO/ MVNE, which introduce (among others aspects) new maximum rates under EU regulation, were agreed between the parties and currently are in the signing process. Once the annexes have been signed, the regulated rates will be retroactively (i.e. from 01.07.2013) adjusted to the co-operation.

In the case of EEA countries, the Roaming Regulation applies in these countries as of 7 December (Norway and Liechtenstein) and 21 December (Iceland) 2012.

The Report includes data from Croatia where the Roaming Regulation applies as of 1 July 2013 as historical data are not available.

Main Findings

The information gathered by BEREC continues to show a good level of compliance with the Roaming Regulation in all EU Member States. At the retail level, all consumers have access to a Euro-Voice-, Euro-data- and a Euro-SMS-tariff. At the wholesale level, the voice, SMS and data roaming charges set between operators are in line with the declining regulated average caps. Some countries reported average prices slightly above the price caps.¹⁴

Evolution of prices

The applicable caps and the related EEA average prices, during the data collection period, were:

| Service at Retail level (no VAT) | Q4 2013 | | Q1 2014 | |
|--|-----------|-------------|-----------|-------------|
| | Price Cap | EEA Average | Price Cap | EEA Average |
| Eurotariff voice (making call) (€/min) | 24 | 21.4 | 24 | 20.8 |
| Eurotariff voice (receiving call) €/min) | 7 | 5.9 | 7 | 5.7 |
| Euro-SMS sent (€/SMS) | 8 | 7.3 | 8 | 7.2 |
| Data transfer (€/MB) | 45 | 17.4 | 45 | 16.7 |

| Service at wholesale level (no VAT) | Q4 2013 | Q1 2014 |
|-------------------------------------|---------|---------|
|-------------------------------------|---------|---------|

¹⁴ The reasons for most such cases are explained in the Methodology Chapter. Moreover, NRAs are monitoring compliance with the provisions of the Regulation to gather further information on the possible reasons for higher reported prices than the caps. BEREC will keep monitoring this issue closely.

| | Price Cap | EEA Average | Price Cap | EEA Average |
|----------------------------|-----------|-------------|-----------|-------------|
| Wholesale voice (€/minute) | 10 | 9.4 | 10 | 6.8 |
| Wholesale SMS (€/SMS) | 2 | 1.9 | 2 | 1.7 |
| Wholesale data (€/MB) | 15 | 6.1 | 15 | 4.2 |

In general, average Eurotariff retail voice roaming rates (see Figures from 1 to 6) remained fairly below the regulated caps in most EU Member States during the data collection period. For calls made, the EU average Eurotariff was €0.214 in Q4 2013 and 0.208 in Q1 2014 compared to a cap of €0.24. The EU average unregulated voice tariff for calls made (Figure 3) was lower than during the equivalent period one year ago: €0.287 and 0.272 respectively in Q4 2013 and Q1 2014 compared to 0.320 and 0.310. For calls received, the EU average Eurotariff rate was nearer the cap at €0.059 during Q4 2013 and €0.057 in Q1 2014, compared to a cap of €0.070. For calls received, (Figure 6), unregulated prices are lower than during the equivalent period one year ago (€0.121 during Q4 2013 and €0.118 in Q1 2014 compared to €0.132 in both Q4 2012 and Q1 2013).

At the wholesale level, (Figures 9-10) the EU average Eurotariff was €0.094 in Q4 2013 and 0.068 in Q1 2014 compared to a cap of €0.10. The regulation has led to a constant reduction in the average EU wholesale prices for intra-EEU roaming voice calls (Figure 11).

Considering 'Rest of World' retail voice roaming calls (Figures 20 - 24), typical prices are significantly higher than for calls within EU countries. Comparing the medium-term trends (Figure 24), a decreasing trend coupled with a yearly constant oscillation (Q1 > Q2 > Q4 > Q3) for calls made and received is shown. There are no indications that operators have in general tended to raise the prices of unregulated 'Rest of World' roaming calls to make up for loss of revenue due to lower regulated price caps.

Regarding the effects of standardisation of billing units for Eurotariff calls (Figures 12 - 13), the 2012 Regulation (the mechanism introduced in the amended 2009 Regulation) requires per second billing for Eurotariff calls made, with the possibility of charging for an initial minimum period of up to 30 seconds to cover the costs of setting up the call. This has led to a significant drop in the EU average surcharge for calls made, from around 21% in Q2 2009 to 2.56% in Q4 2013 and to 2.63% in Q1 2014.

The introduction of the Euro-SMS in the EU in accordance with the 2009 Regulation continued in the 2012 Regulation and has led to an EU average Euro-SMS price (Figures 25 - 26) of around €0.072 both in Q4 2013 and in Q1 2014, compared to a regulated cap of €0.08. The EU average price for unregulated SMS is higher, at €0.102 in Q4 2013 and €0.094 in Q1 2014. Before the 2009 Regulation, the EU average SMS price was around €0.27 - €0.24 (at Q1 - Q2 2009).

At the wholesale level, the 2012 Regulation has led to a reduction in the average EU SMS price (Figures 28-29) to €0.019 in Q4 2013 and €0.017 in Q1 2014. In comparison, the EU average price was €0.136 - €0.133 in Q1 - Q2 2009, before the 2009 Regulation came into force.

The 2012 Regulation introduced new retail price caps for data services (€0.45 in both Q4 2013 and Q1 2014). This has led to a progressive drop in retail prices (Figures 33 - 34). There is a significant difference between the prices for non-group retail data services in 2011/2012 and

the data Eurotariff for the relevant period: €1,487 in Q4 2011, €1.379 in Q1 2012 comparing to €0.174 and €0.167 in the same quarters Q4 2013 and Q1 2014 for the Eurotariff.

At the wholesale level, an average data cap of €0.15 in Q4 2013 and Q1 2014 applies in the EU under the 2012 Regulation. The EU average price for non-group wholesale data (Figure 36) has fallen to €0.061 per MB in Q4 2013 and €0.042 per MB in Q1 2014, compared with an EU average of €1.20 in Q2 2009, just before the Regulation came into effect.

In the case of wholesale agreements based on Article 3 of the Roaming Regulation, only some operators submitted the data. BEREC's International Roaming Compliance Report¹⁵ showed that operators negotiate roaming services at the wholesale level individually and that the provision of such services is based on commercial agreements. Some light MVNOs as well as resellers stated that these services continue to be provided on the basis of the existing contracts with national host MNOs.

Evolution of volumes

Regarding EU volumes on voice, SMS and data roaming services (Figures: 16-19, 31-32 and 39-40), one particular issue stands out which is the significant difference between these services. While volumes for voice and SMS services show a minimal or small increase from 2008 (between 1.05 and 1.7 times), data services increased up to around 12.75 times in Q4 2013 and Q1 2014 compared to 2008 correspondent quarters.¹⁶

Evidence of market forces at work

For voice roaming services, average EEA prices are close to the regulated caps. This suggests that providers see little attraction in competing on Eurotariff rates, despite the fact that there is a significant margin between typical wholesale prices and retail caps.

On the other side the, as also reported in the previous Benchmark Reports, the European average alternative price for calls made remains significantly above the Eurotariff average price (Figure 3).

The Eurotariffs account for the majority of voice and SMS traffic. Nevertheless customers opt for these alternative tariffs and in Q1 2014, 33.9% of calls made and 25.4% of calls received were based on non-Eurotariffs (Figures 14 – 15). For text messages sent while roaming within EEA countries, unregulated non-Euro SMS tariffs accounted for 14% of the total volume (Figure 30). There is a significant different trend in the case of data roaming services. In Q1 2014 around 44.4% of data traffic was based on the non-Euro data tariff while roaming¹⁷. In this regard, also the BEREC Report on Transparency and Comparability of International

¹⁵ BEREC International Roaming Compliance Report (Regulation (EU) No 531/512 of the European Parliament and of the Council of 13 June 2012 on roaming), the link:

http://berec.europa.eu/eng/document_register/subject_matter/berec/reports/1482-berec-international-roaming-compliance-report-regulation-eu-no-531512-of-the-european-parliament-and-of-the-council-of-13-june-2012-on-roaming

¹⁶ It should be noted that the results displayed in the charts might take into account values from different number of operators that submitted data in the relevant quarters. In this Report Croatia is also included which could affect total volumes as well.

¹⁷ It must be noted that not all countries provided data for prepaid or postpaid alternative tariffs and care should be taken when comparing percentages with voice and SMS services.

Roaming Tariffs¹⁸ showed that a large number of operators offer a variety of packages of roaming data services. Positive outcomes of competition dynamics for data roaming are also signalled by the much bigger differential (compared to voice calls and SMS) between the regulated caps and the average Euro and Non-Euro data price for MB both at retail and wholesale levels.

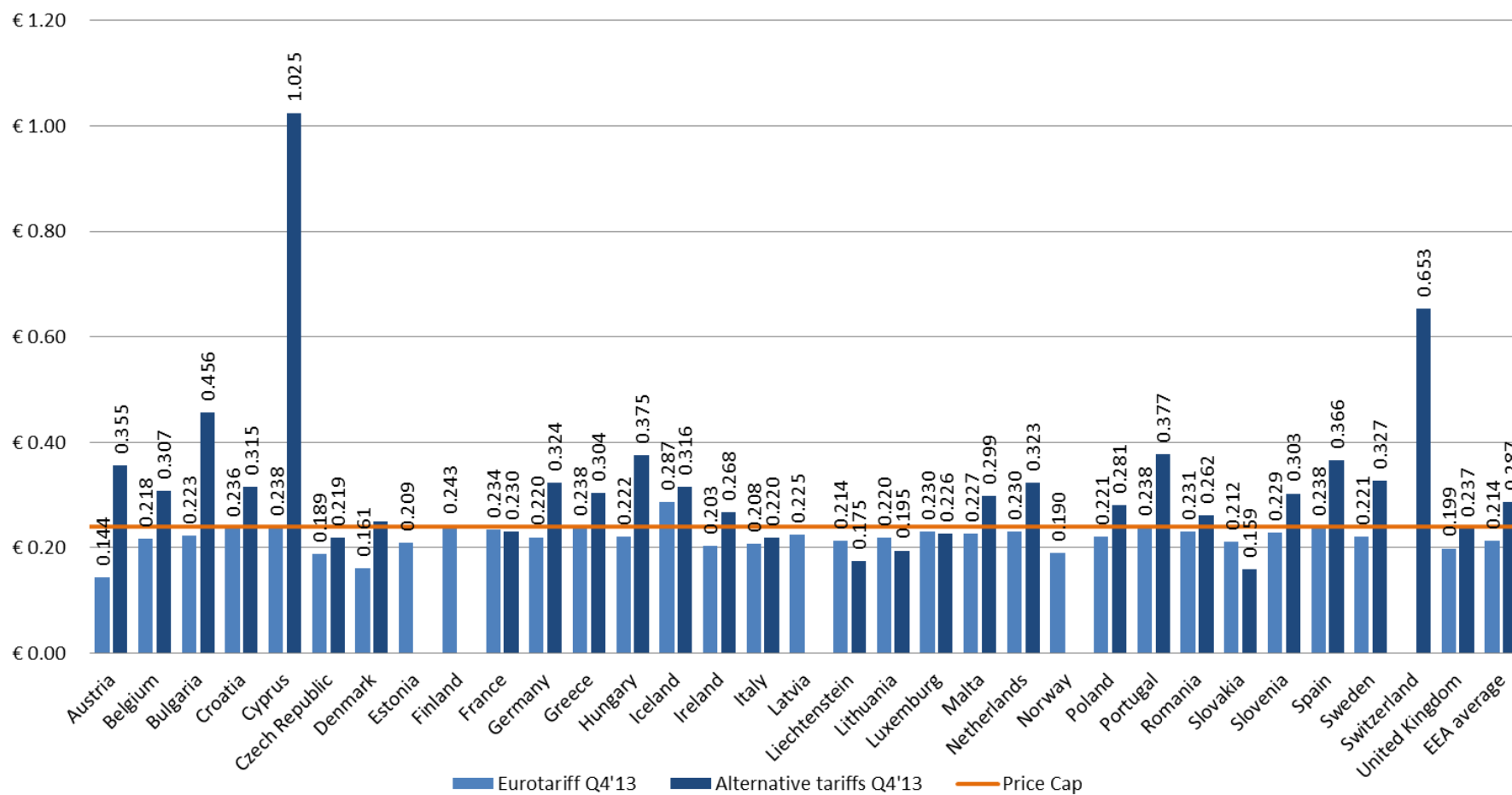
¹⁸ http://bereg.europa.eu/eng/document_register/subject_matter/bereg/reports/3903-report-on-transparency-and-comparability-of-international-roaming-tariffs

Charts

Voice roaming services

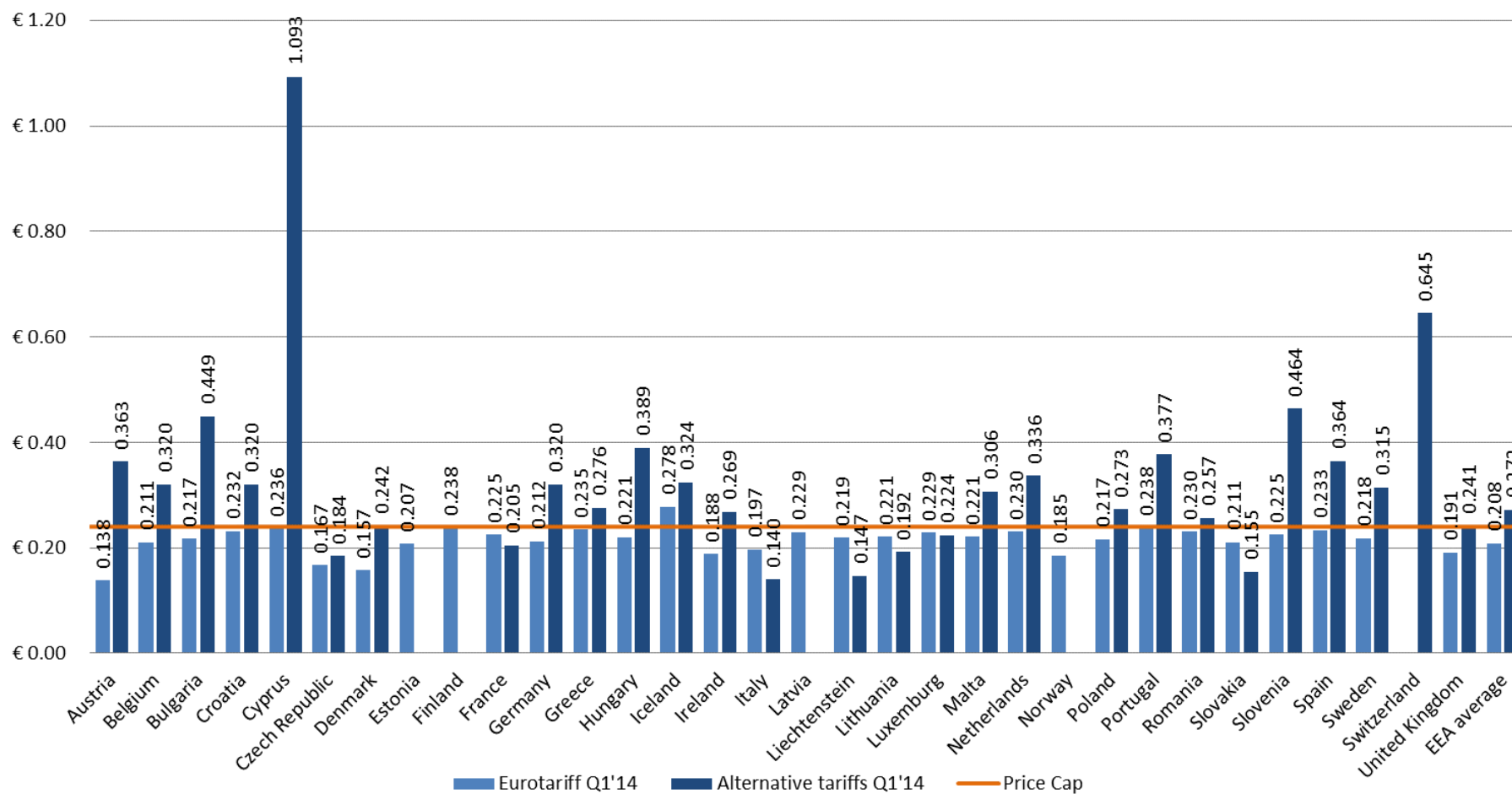
Retail prices

**Figure 1: Average retail price per minute for intra-EEA roaming voice calls made:
Eurotariff and alternative tariffs**



Data for alternative tariffs for some countries have not been reported and for others there are no alternative tariffs.

**Figure 2: Average retail price per minute for intra-EEA roaming voice calls made:
Eurotariff and alternative tariffs**



Data for alternative tariffs for some countries have not been reported and for others there are no alternative tariffs.

Figure 3: EEA average retail price per minute for intra-EEA roaming voice calls made

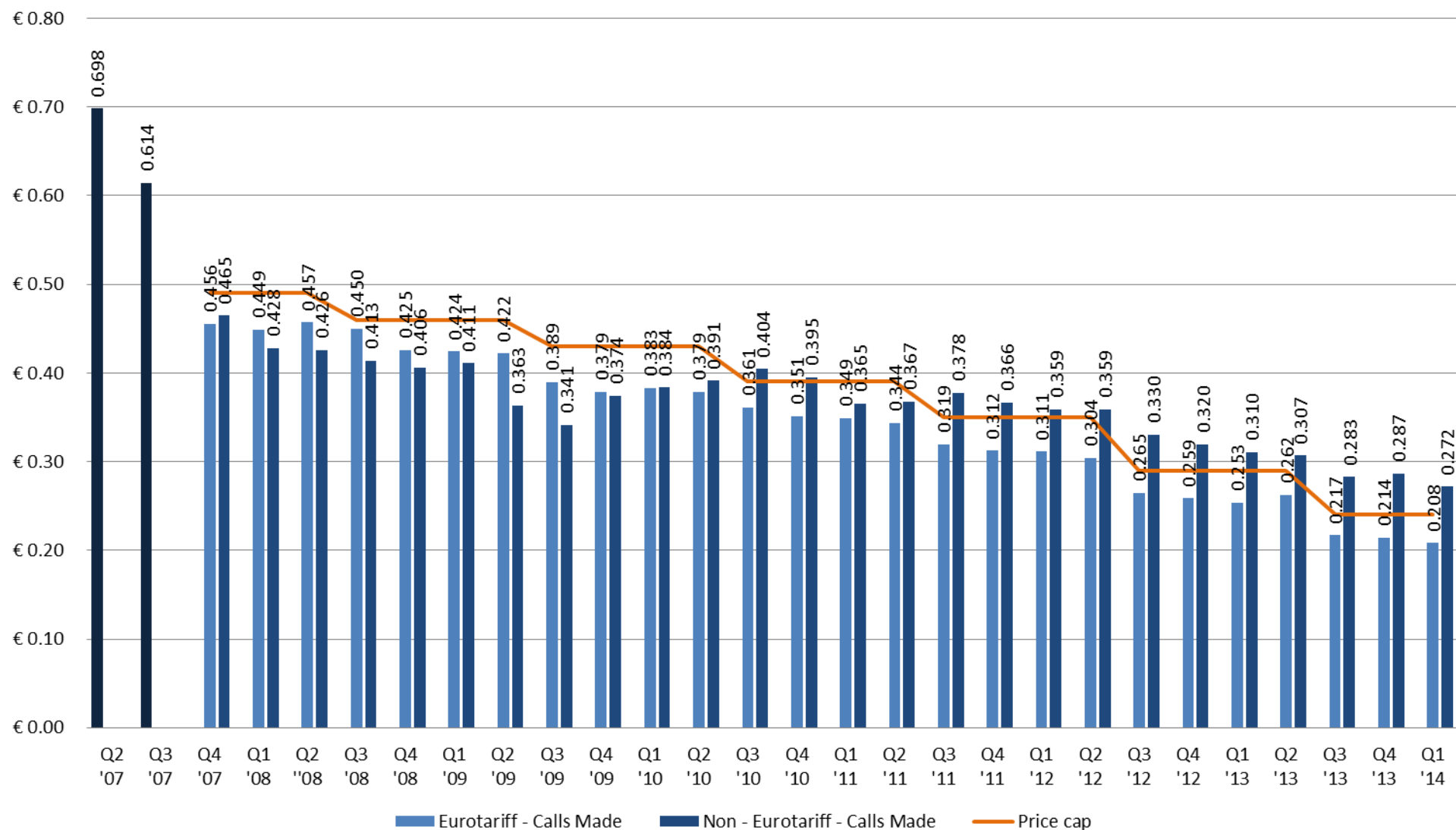


Figure 4: Average retail price per minute for intra-EEA roaming voice calls received: Eurotariff and alternative tariffs

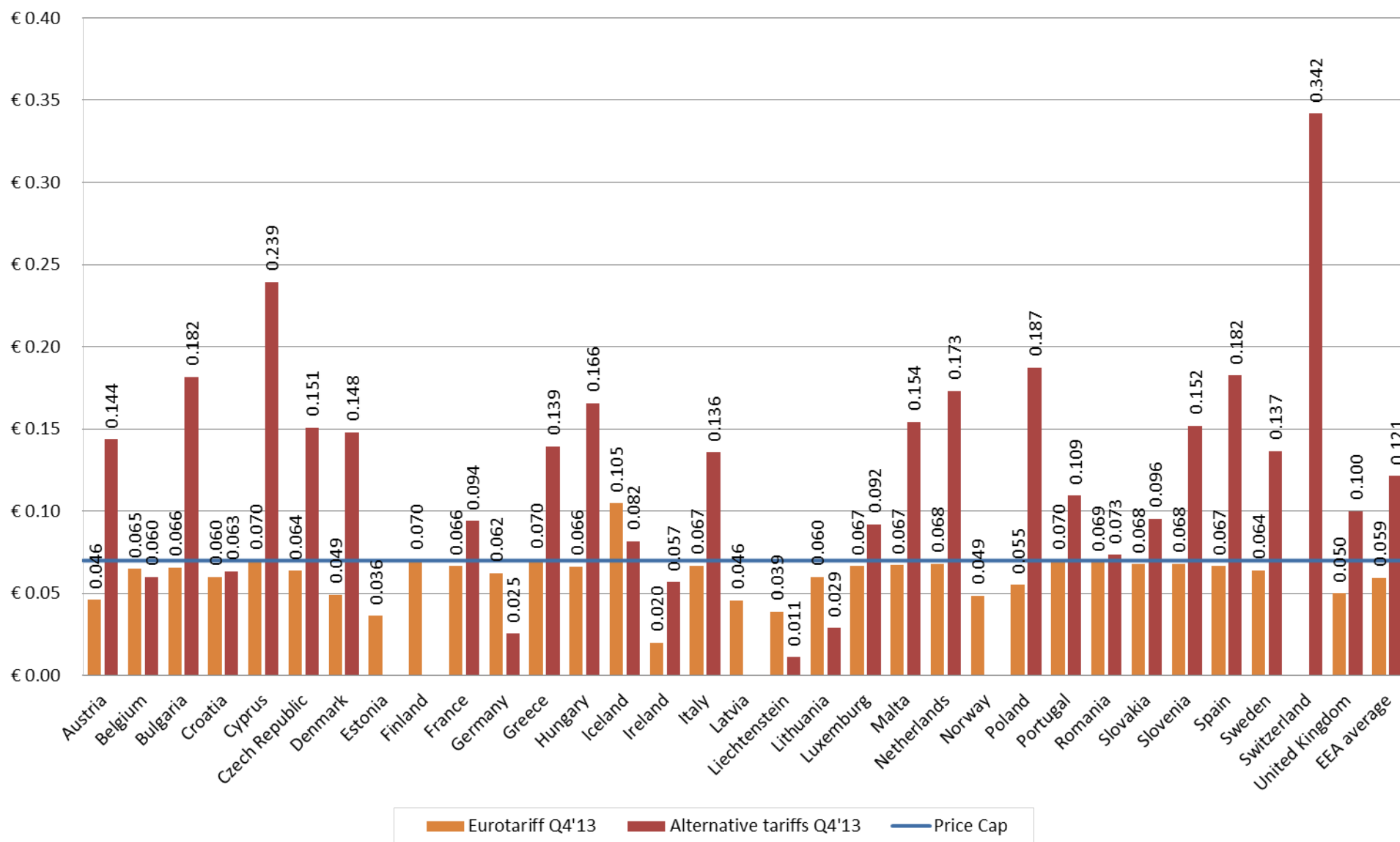
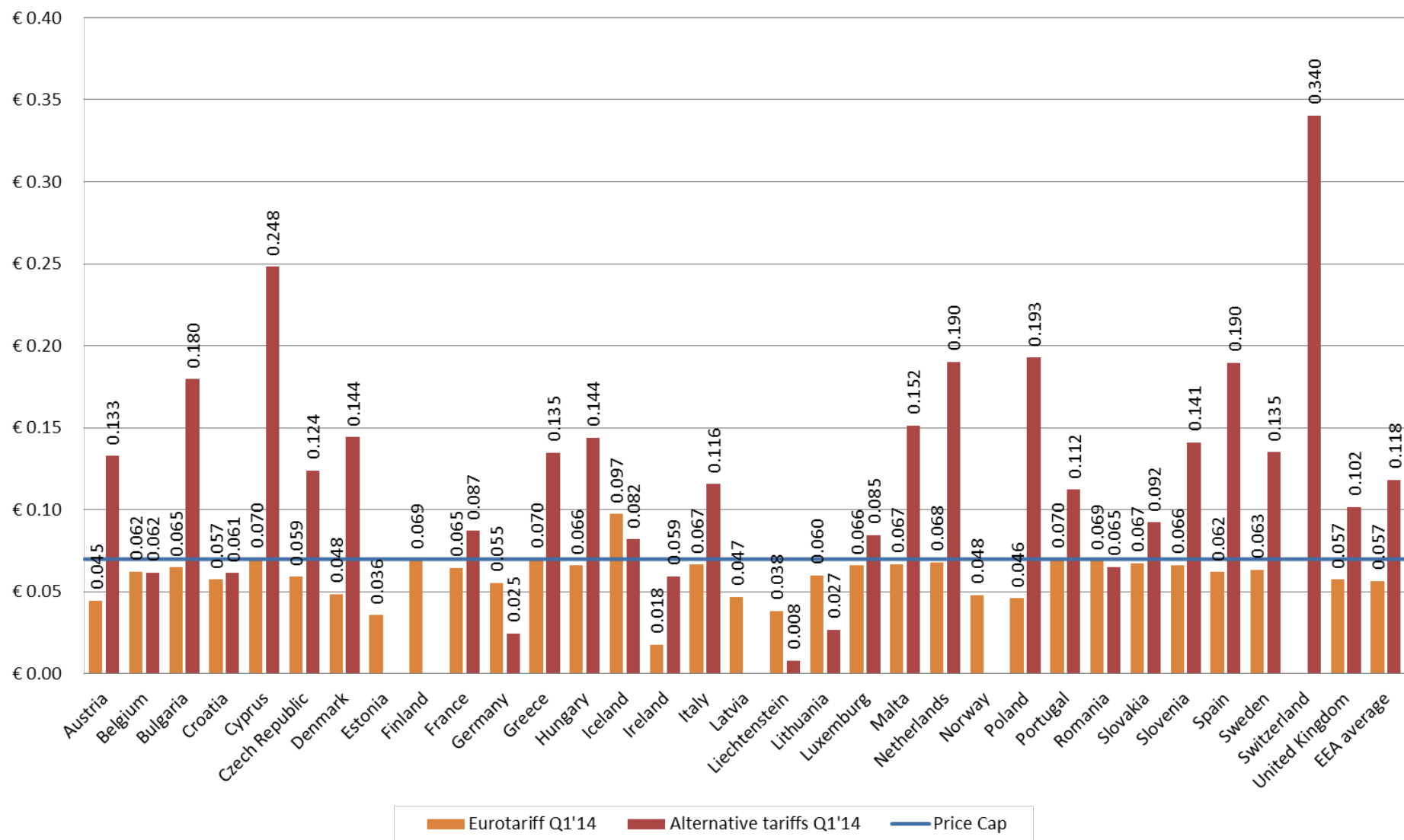
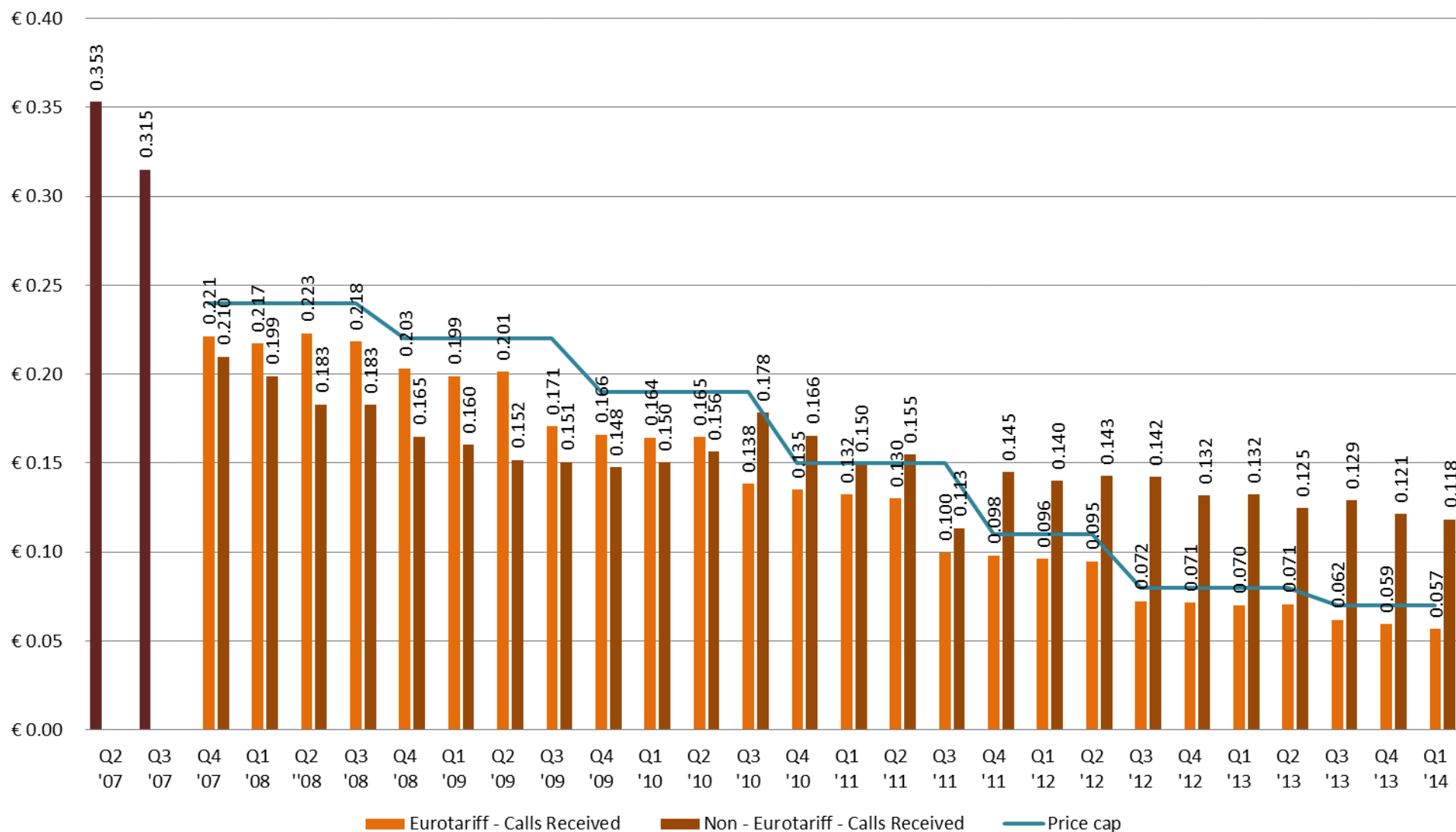


Figure 5: Average retail price per minute for intra-EEA roaming voice calls received: Eurotariff and alternative tariffs



Data for alternative tariffs for some countries have not been reported and for others there are no alternative tariffs.

Figure 6: EEA average retail price per minute for intra-EEA retail roaming voice calls received:



Surcharge for roaming voice calls made

Figure 7: Surcharge as a result of billed minutes for intra-EEA roaming voice calls made: Eurotariff

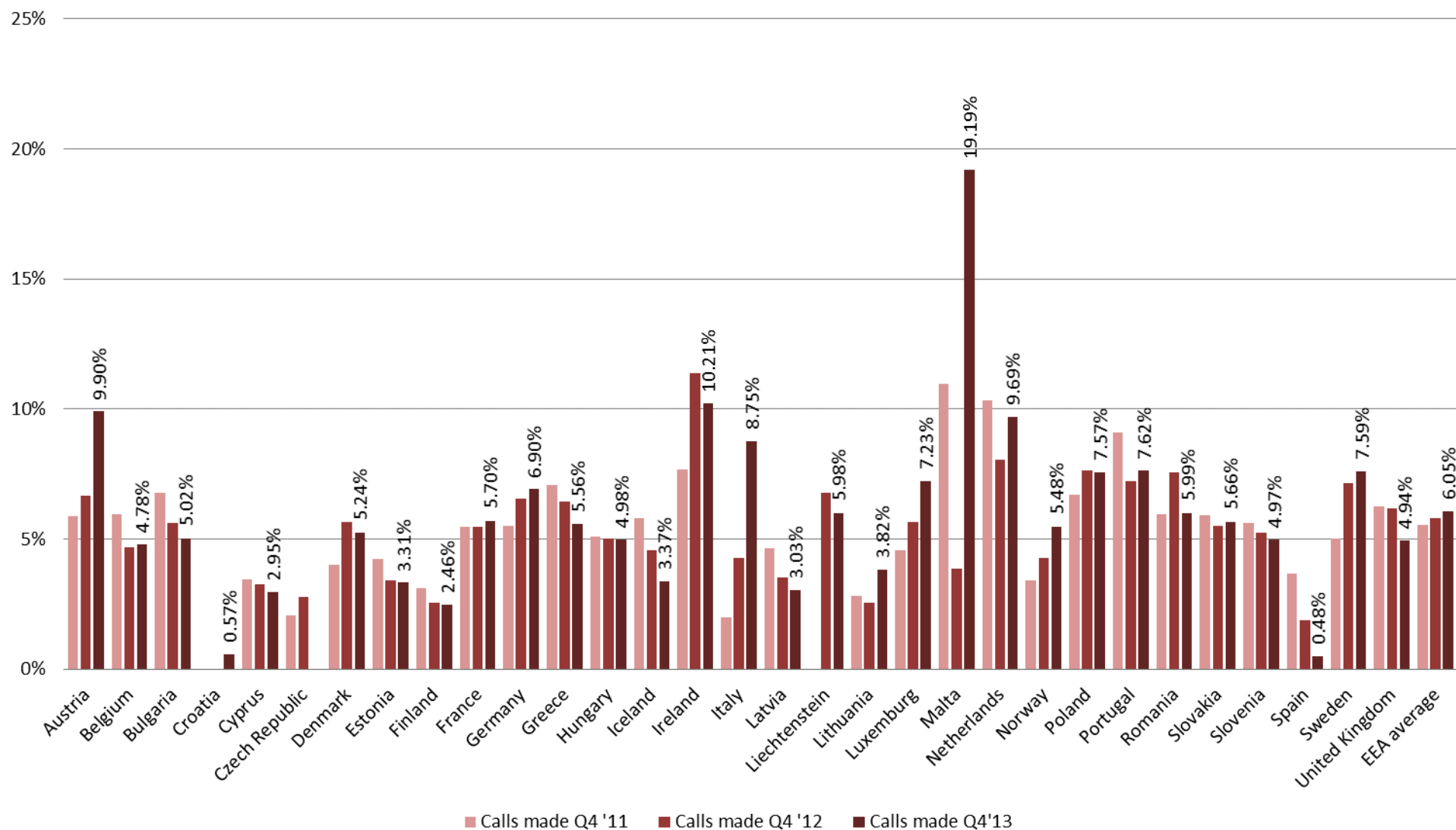
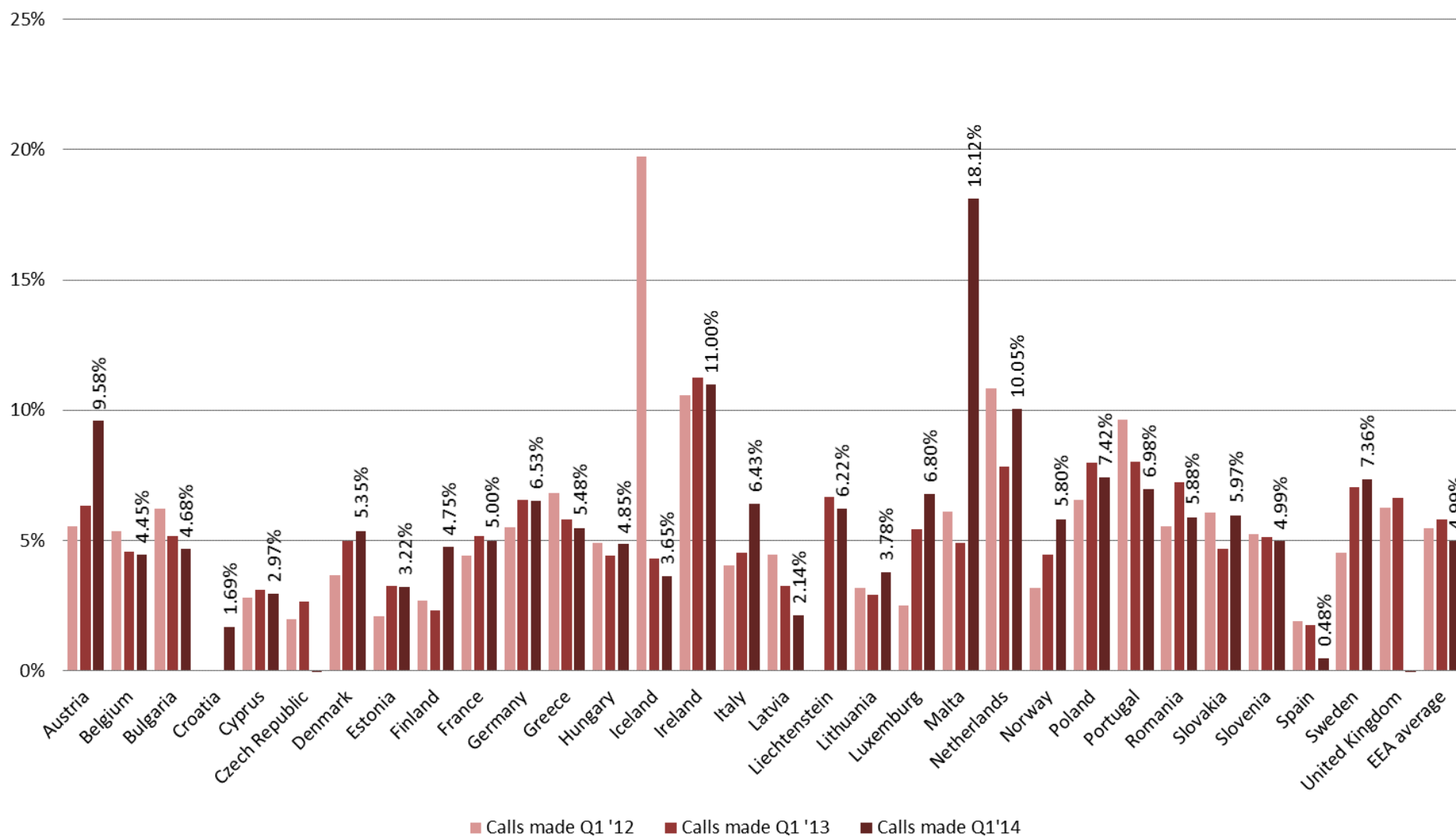


Figure 8: Surcharge as a result of billed minutes for intra-EEA roaming voice calls made: Eurotariff



In Figures 7 and 8, CZ has negative surcharges for Q4'13 and Q1'14 (respectively -2.2% and -5.9%) due to relatively high actual minutes for postpaid tariffs.

Wholesale prices

Figure 9: Average wholesale price per minute for intra-EEU roaming voice calls: charges to non-group companies (wholesale roaming inbound)

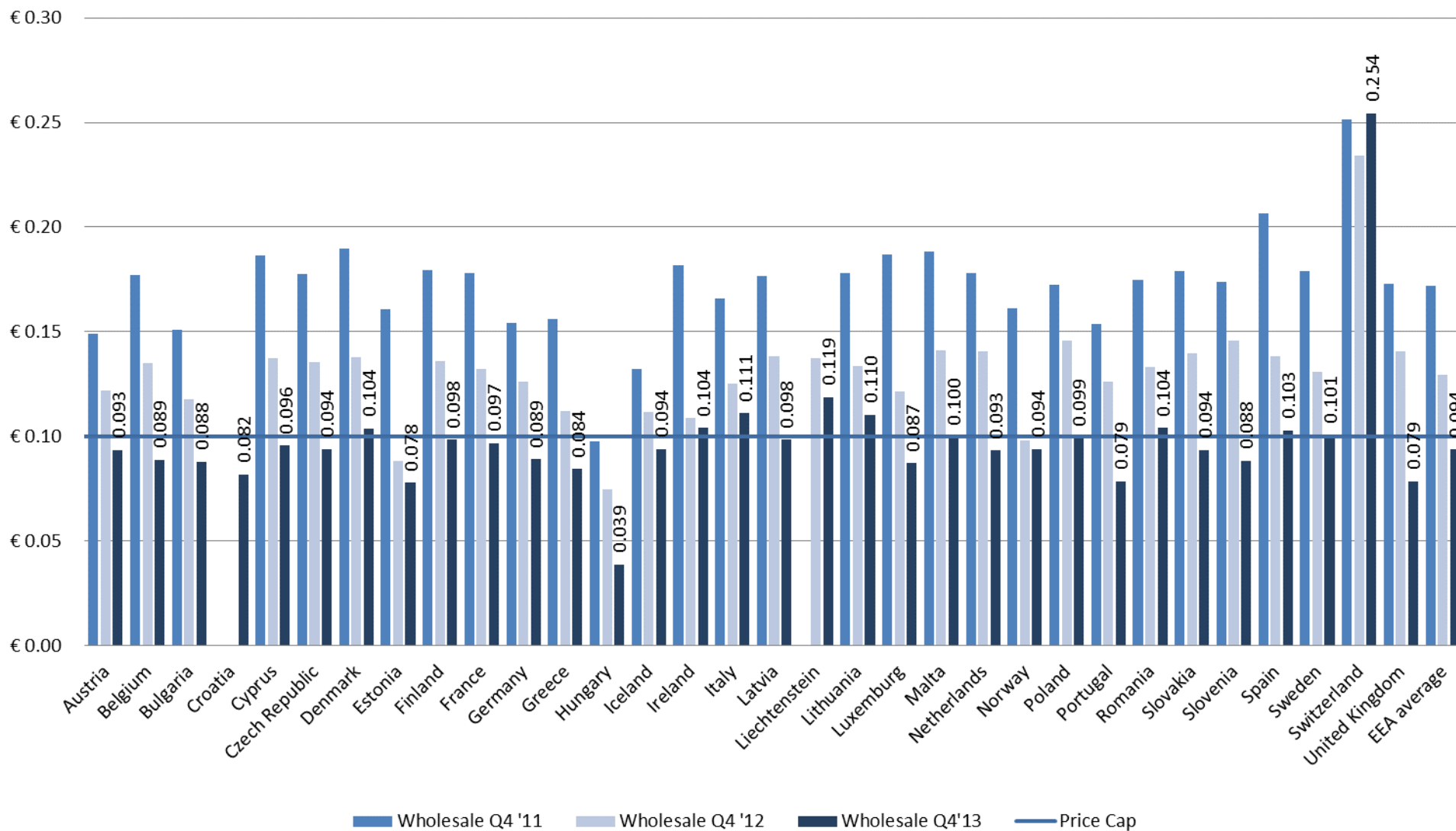


Figure 10: Average wholesale price per minute for intra-EEU roaming voice calls: charges to non-group companies (wholesale roaming inbound)

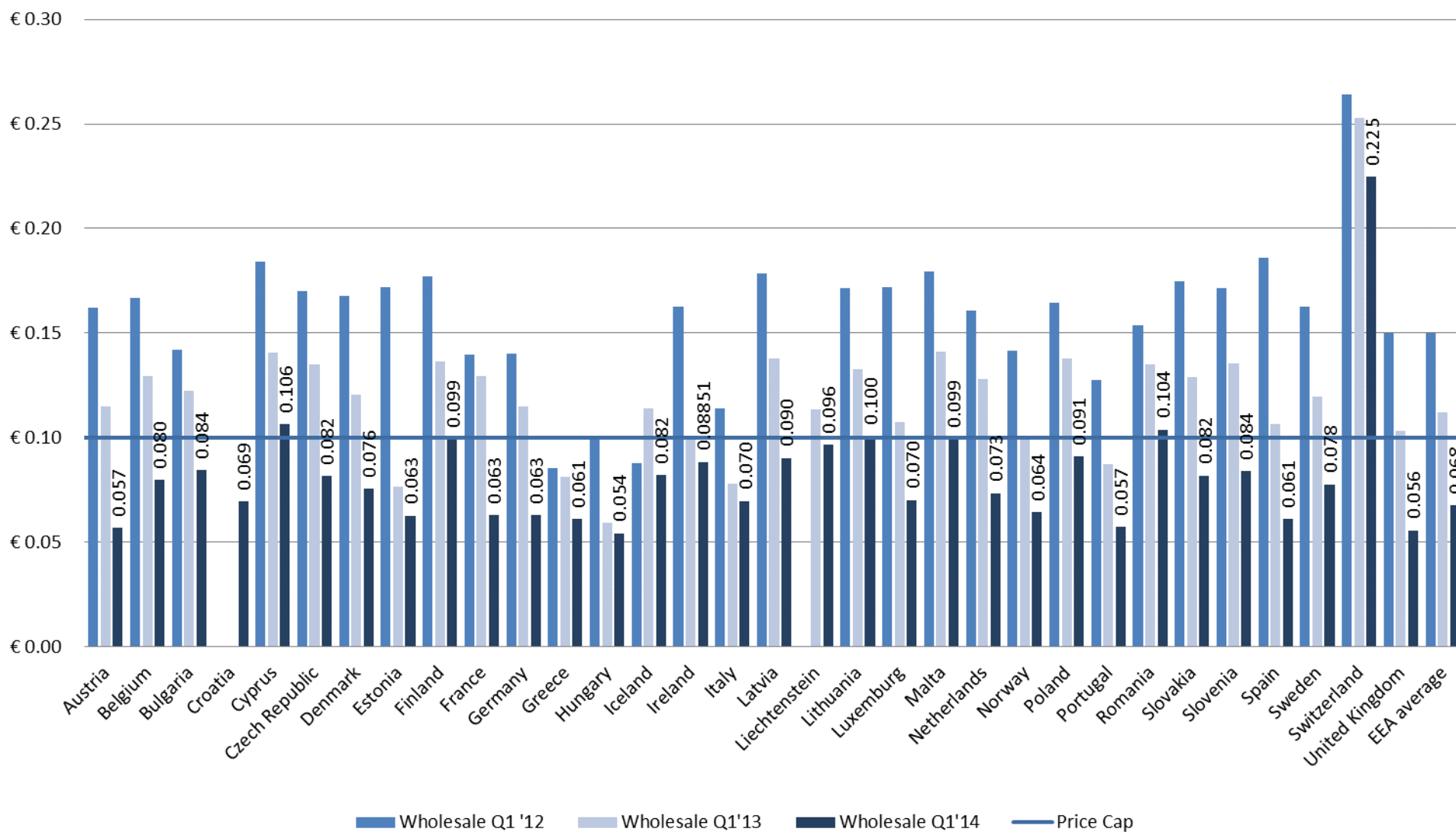
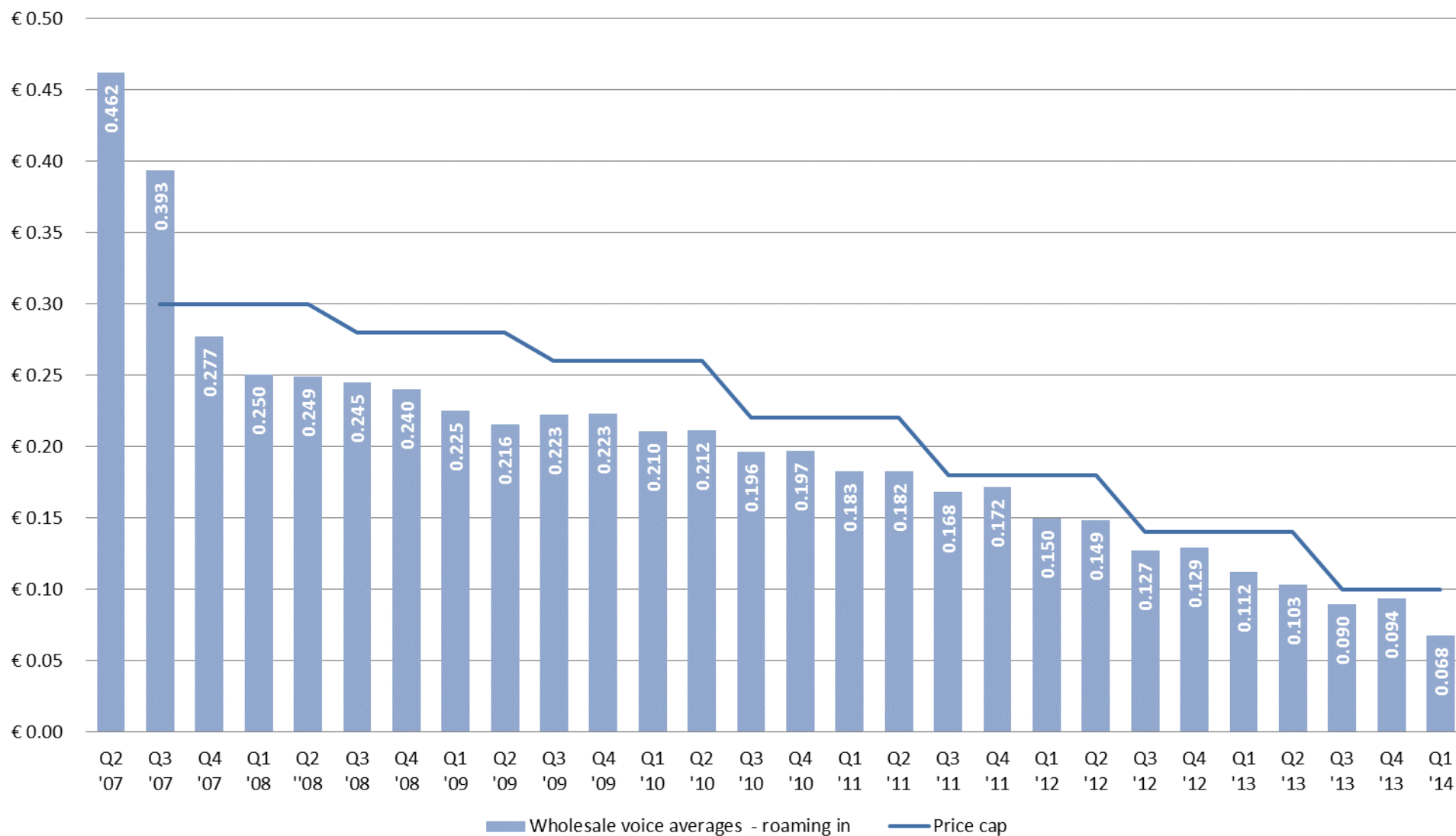
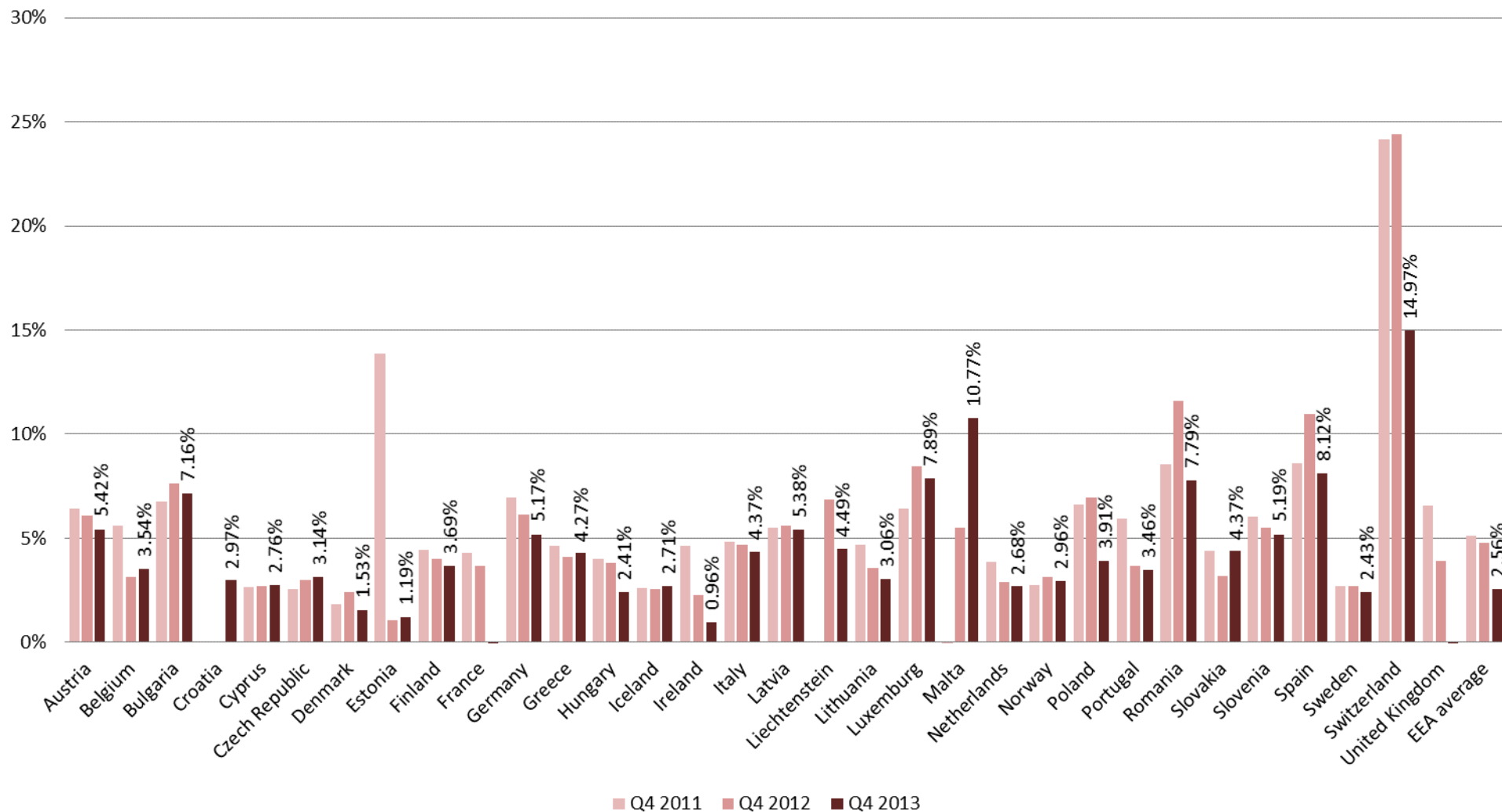


Figure 11: EEA average price per minute for wholesale non-group roaming voice calls

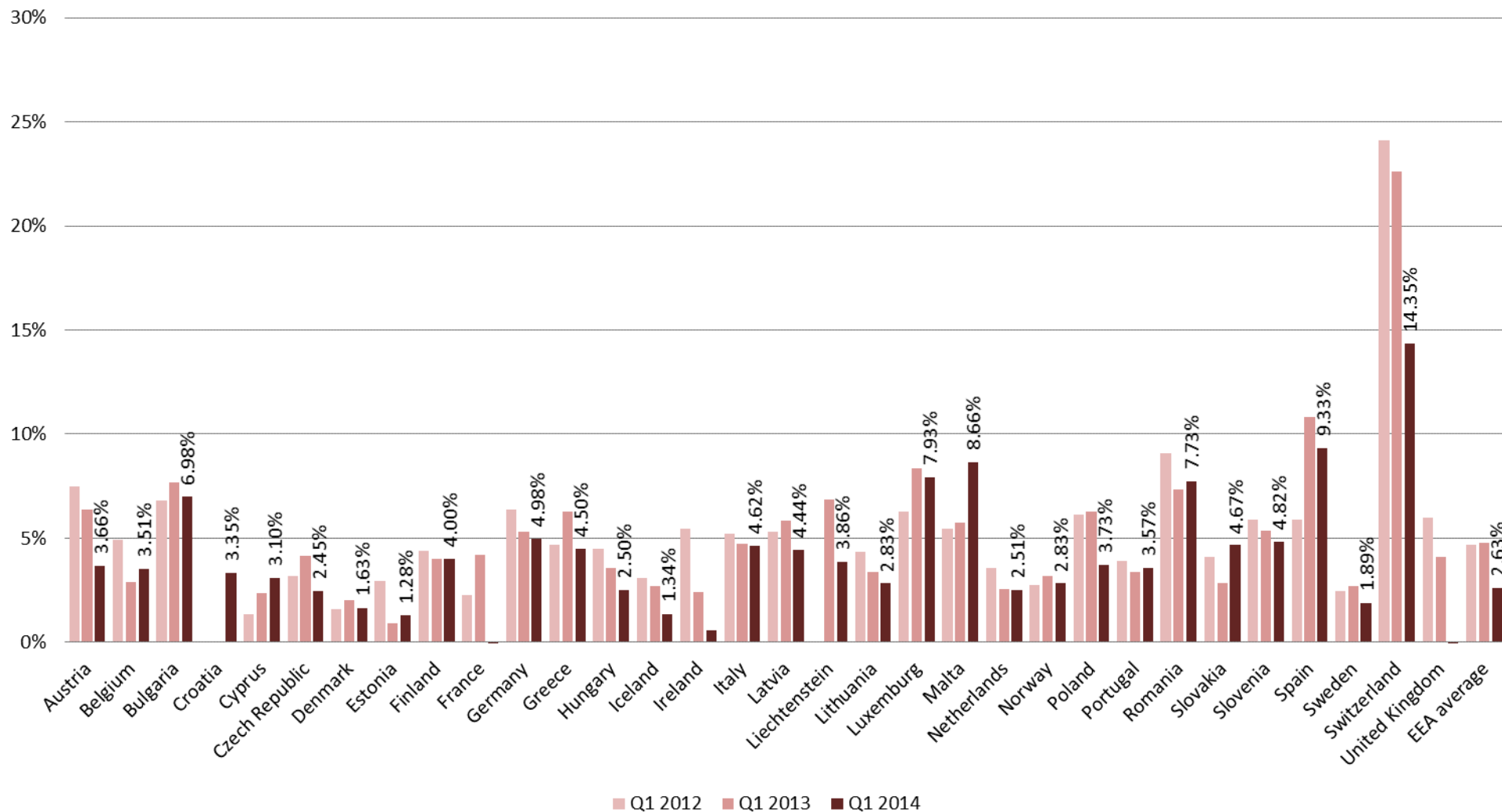


Surcharge for wholesale voice calls

Figure 12: Surcharge as a result of billed minutes for intra-EEA wholesale voice calls (non-group companies)

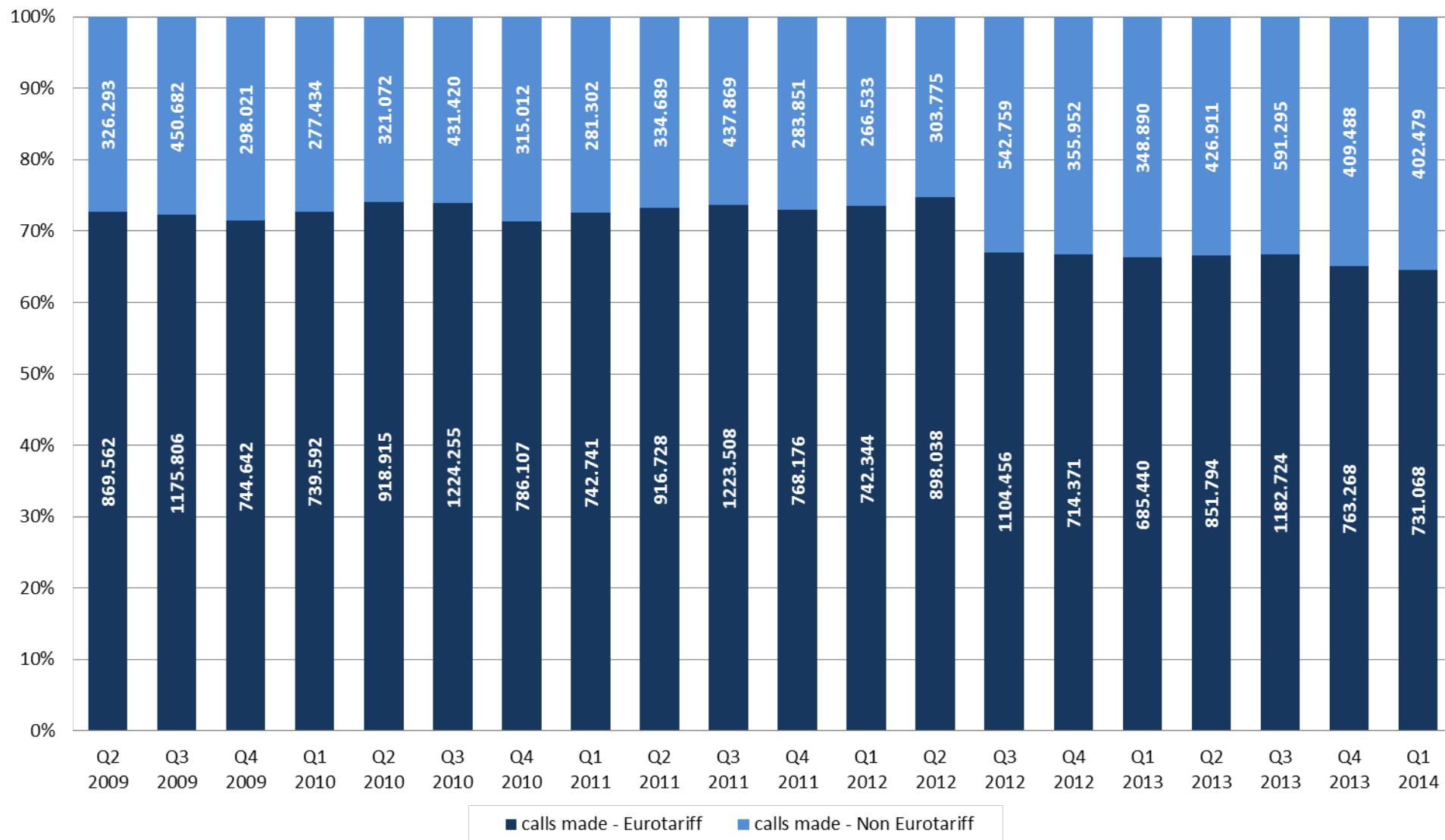


**Figure 13: Surcharge as a result of billed minutes for intra-EEA wholesale voice calls
(non-group companies)**

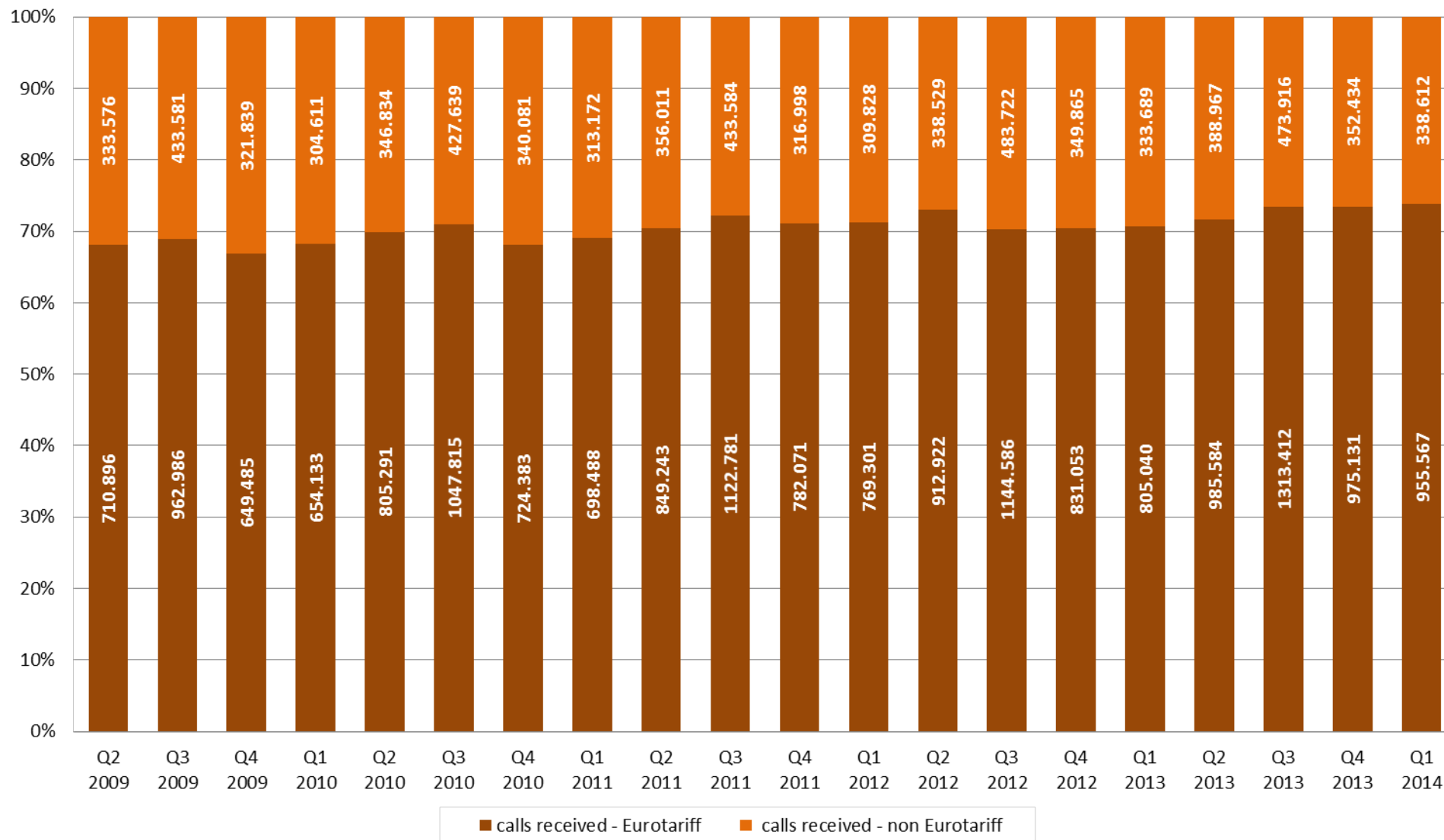


**Percentage of alternative tariffs on total volumes for calls
made/received**

**Figure 14: EEA percentage of calls made: Eurotariff and alternative tariffs
(millions of minutes)**

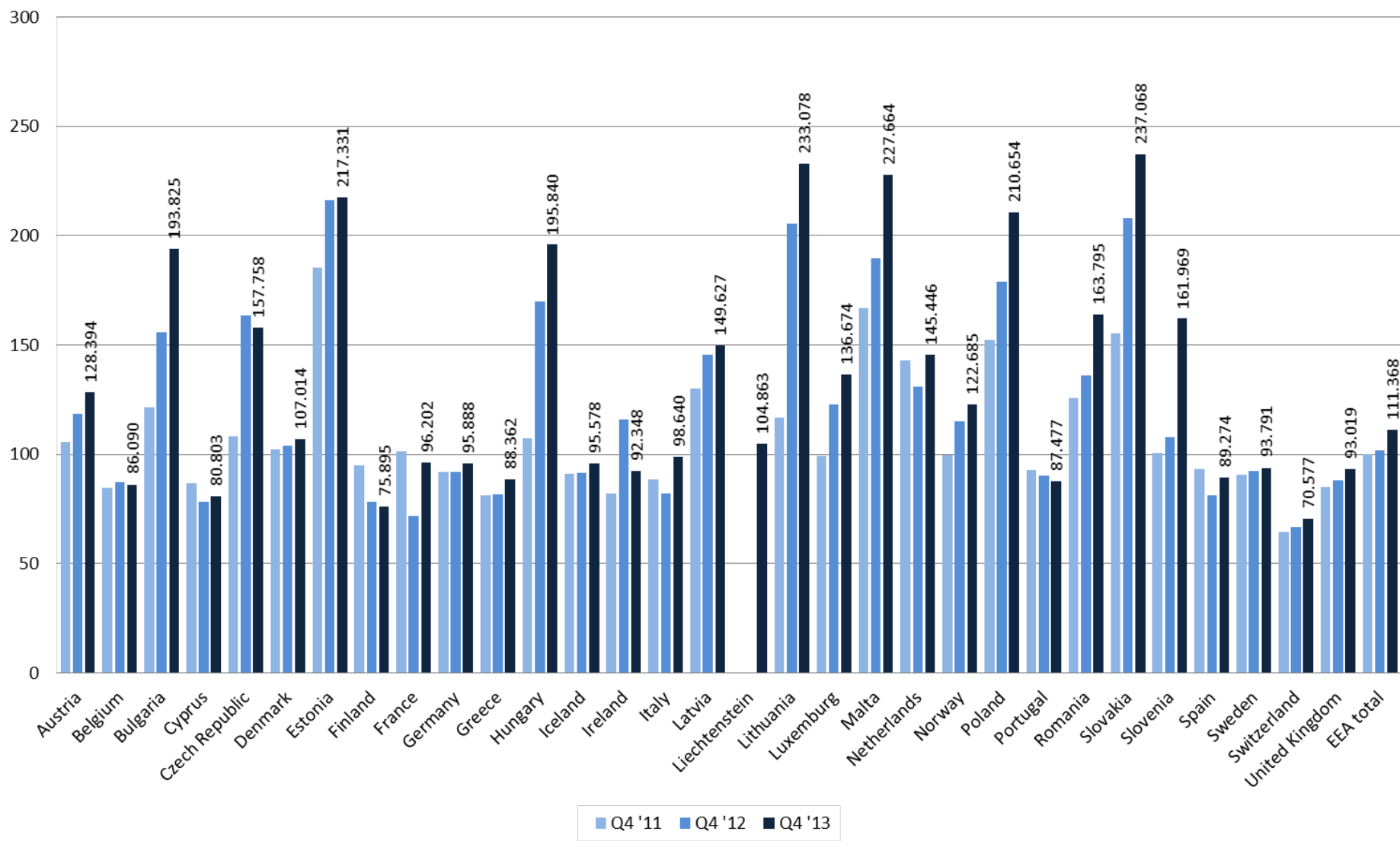


**Figure 15: EEA percentage of calls received: Eurotariff and alternative tariffs
(millions of minutes)**



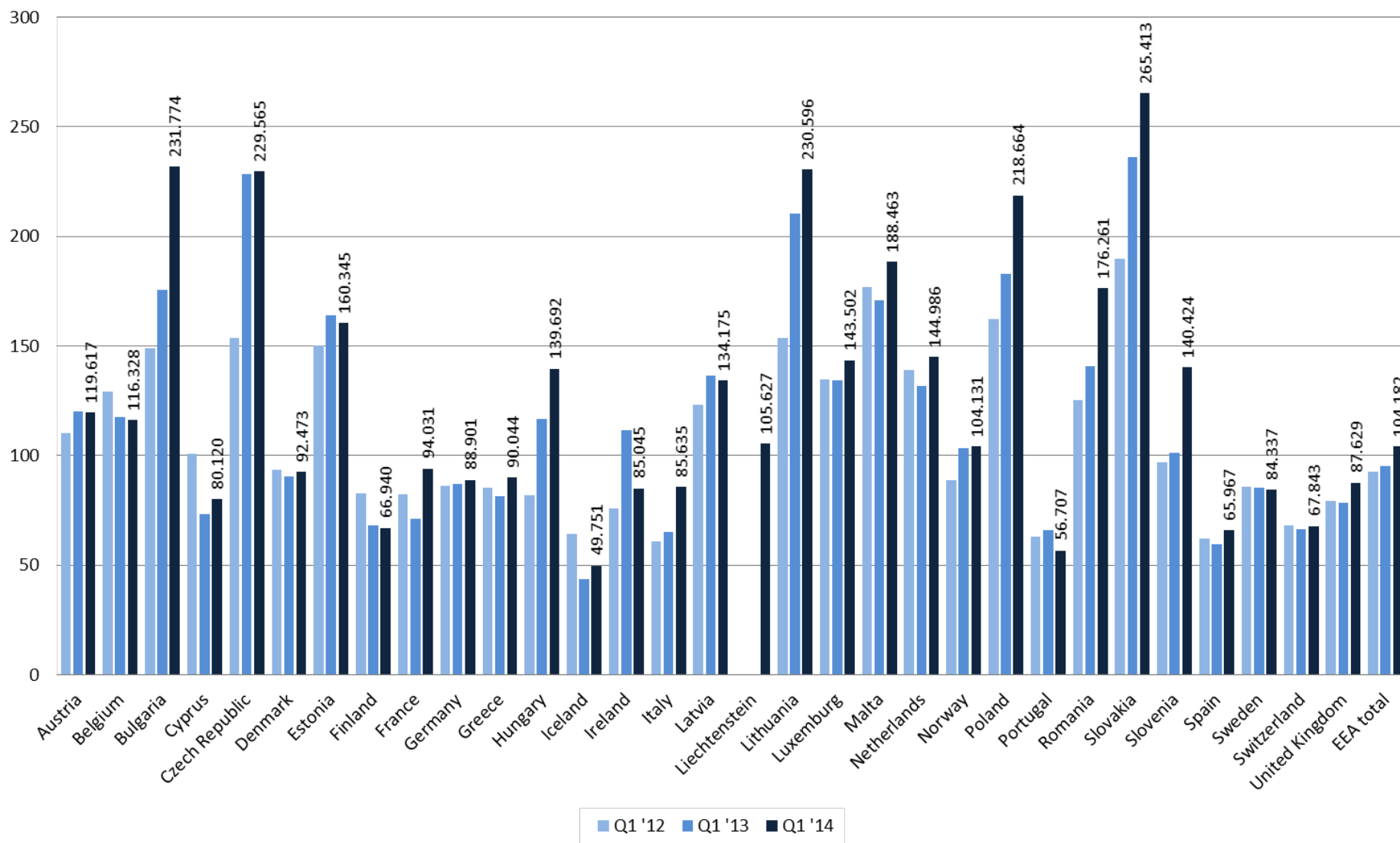
Volumes of retail roaming voice calls

Figure 16: Volumes of intra-EEA roaming calls made in Q4 2013
Index (Q4 2008 = 100)



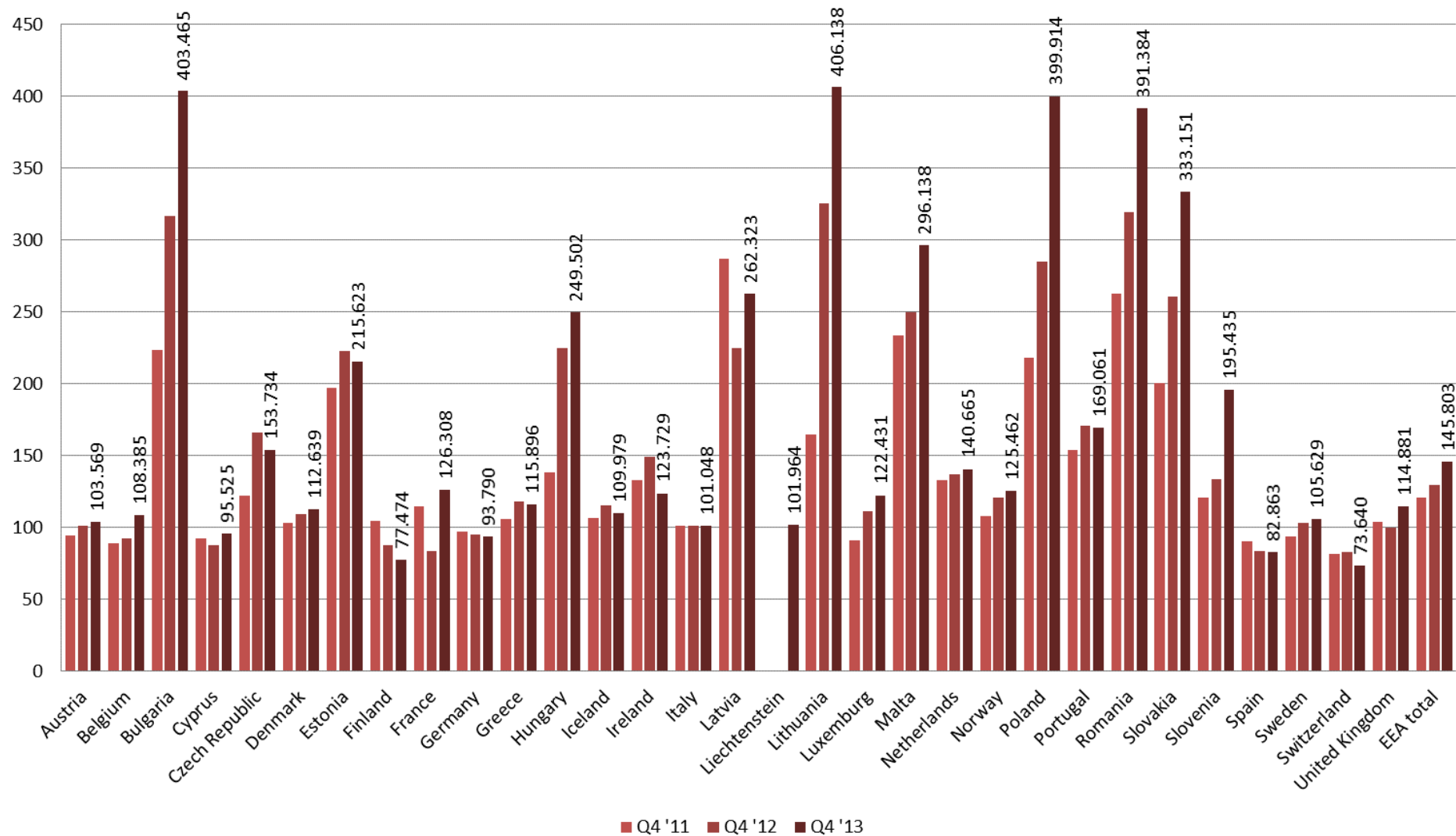
Liechtenstein based on Q4 2012 = 100

Figure 17: Volumes of intra-EEA roaming calls made in Q1 2014
Index (Q1 2008 = 100)



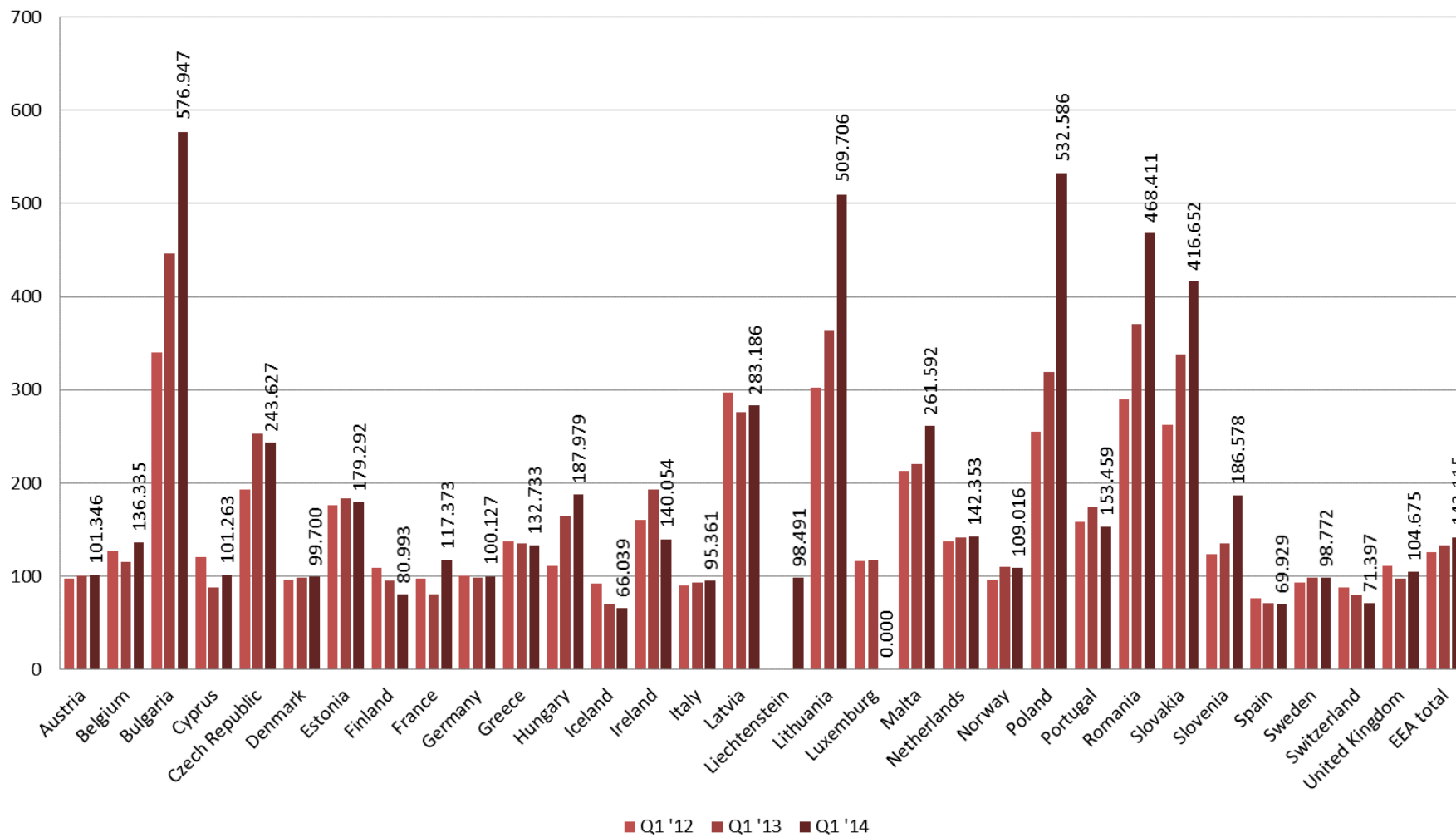
Liechtenstein based on Q1 2013 = 100

Figure 18: Volumes of intra-EEA roaming calls received in Q4 2013
Index (Q4 2008 = 100)



Liechtenstein based on Q4 2012 = 100

Figure 19: Volumes of intra-EEA roaming calls received in Q1 2014
Index (Q1 2008 = 100)



Liechtenstein based on Q1 2013 = 100

Retail and wholesale prices - outside EEA

Figure 20: Average retail price per minute for roaming voice calls made by EEA customers outside EEA

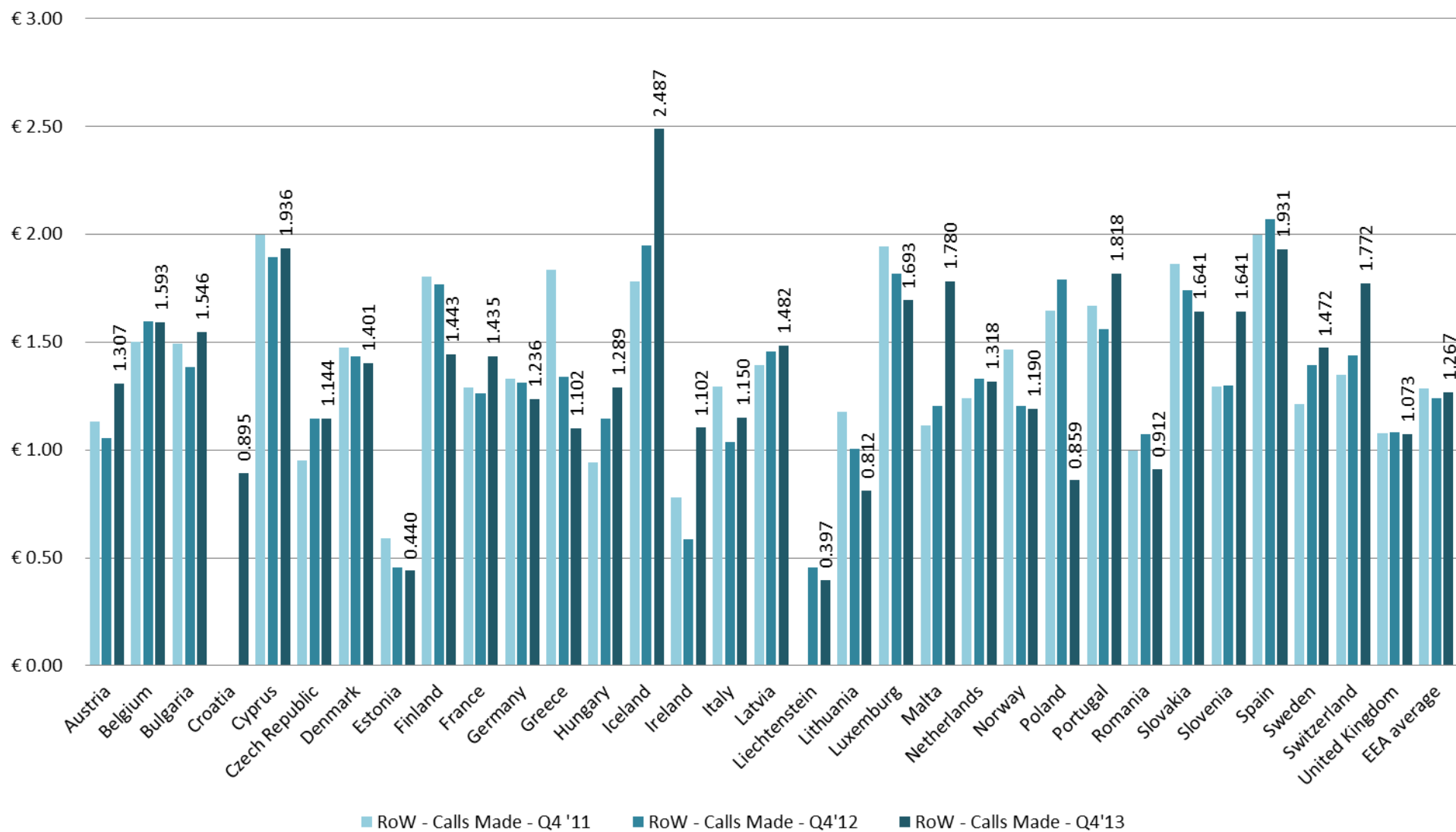


Figure 21: Average retail price per minute for roaming voice calls made by EEA customers outside EEA

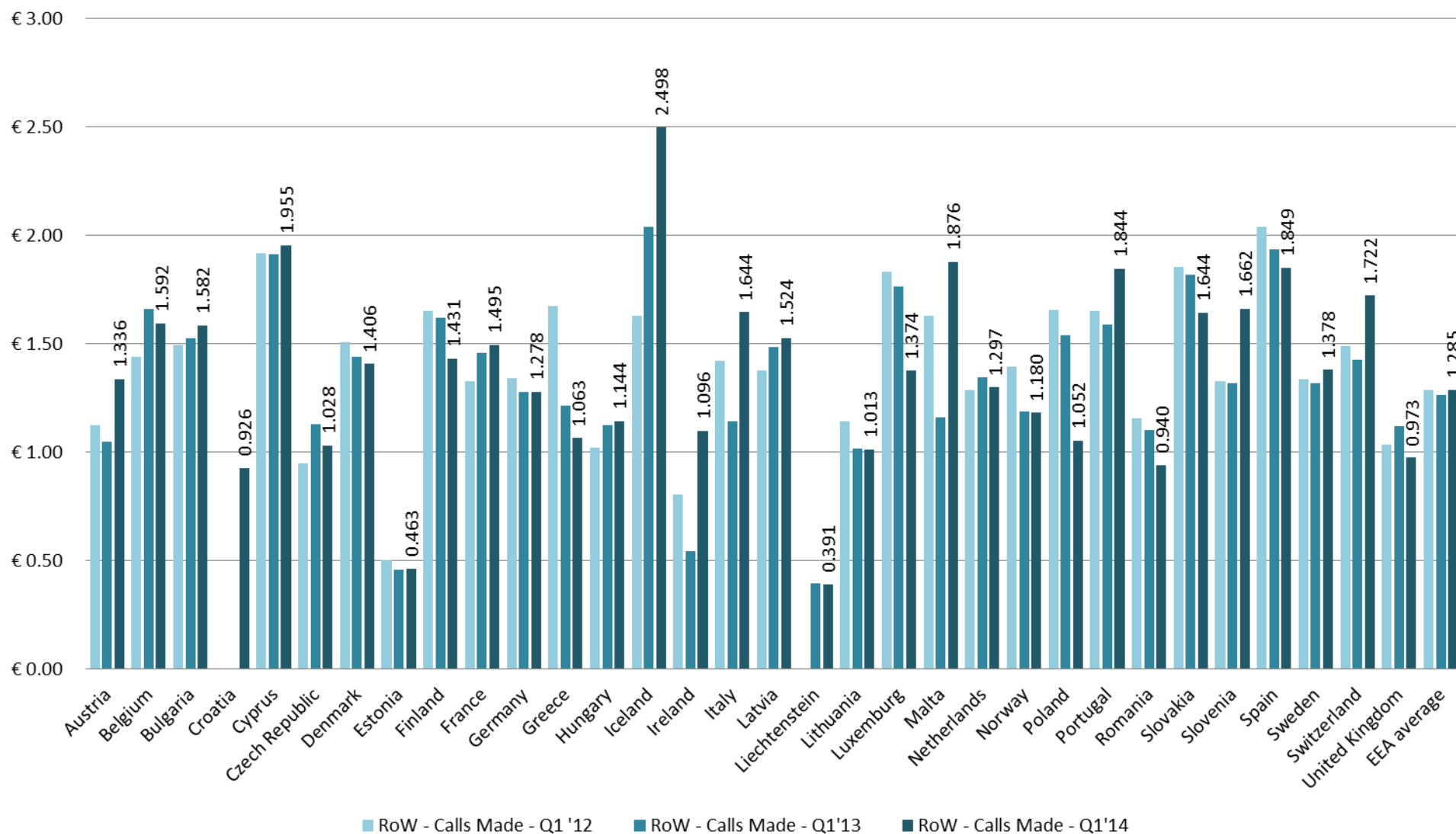


Figure 22: Average retail price per minute roaming voice calls received by EEA customers outside EEA

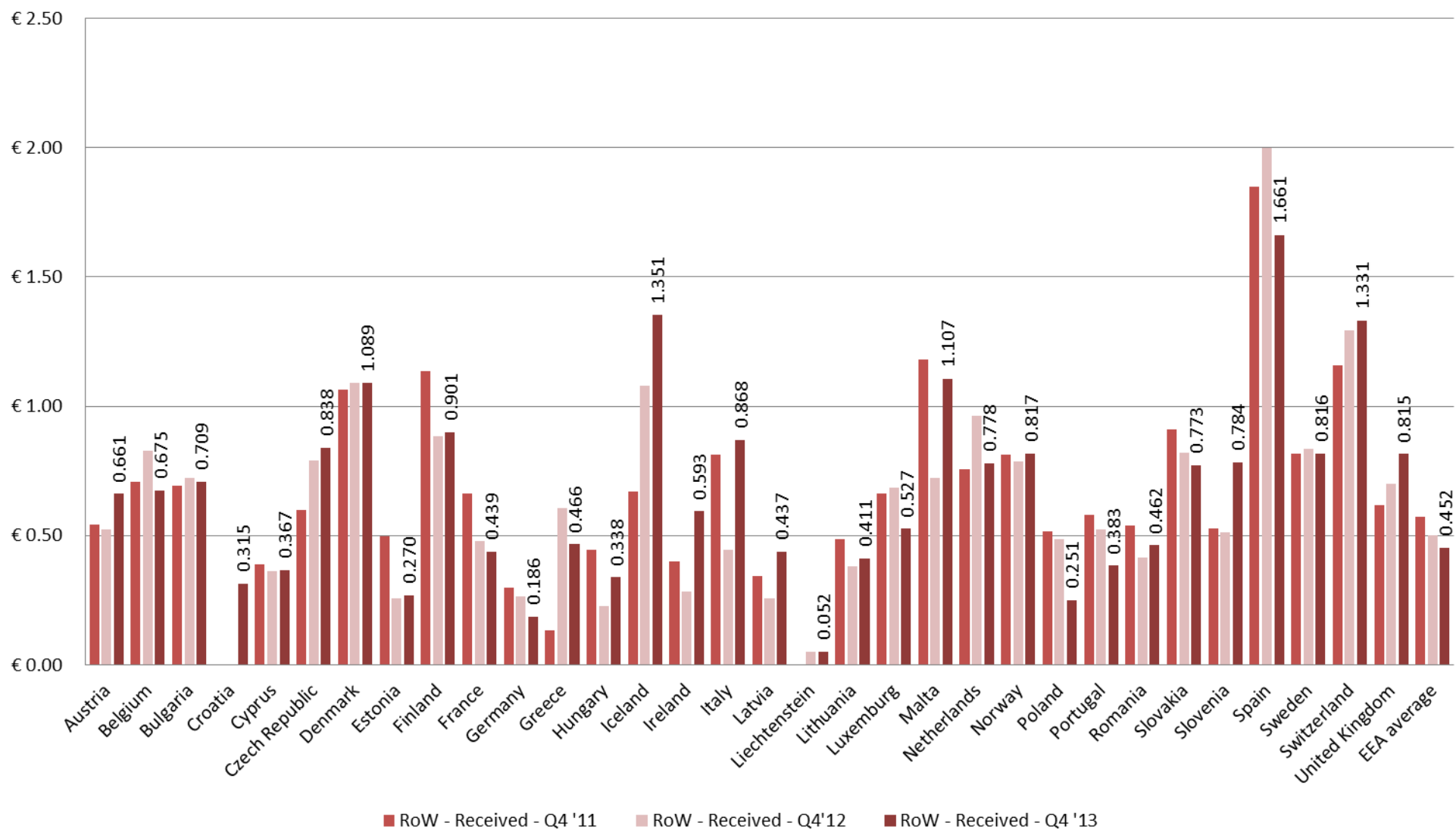


Figure 23: Average retail price per minute roaming voice calls received by EEA customers outside EEA

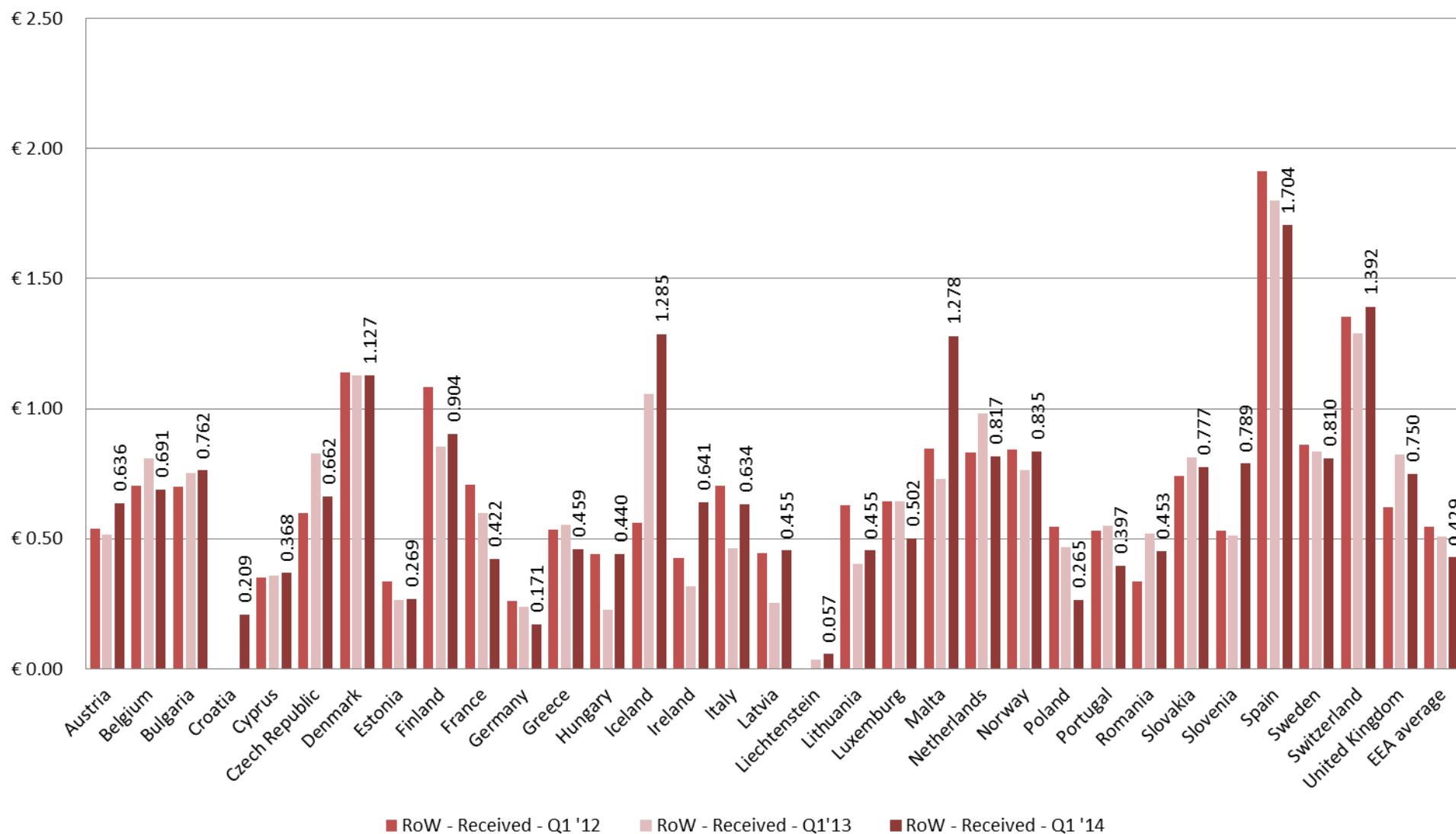
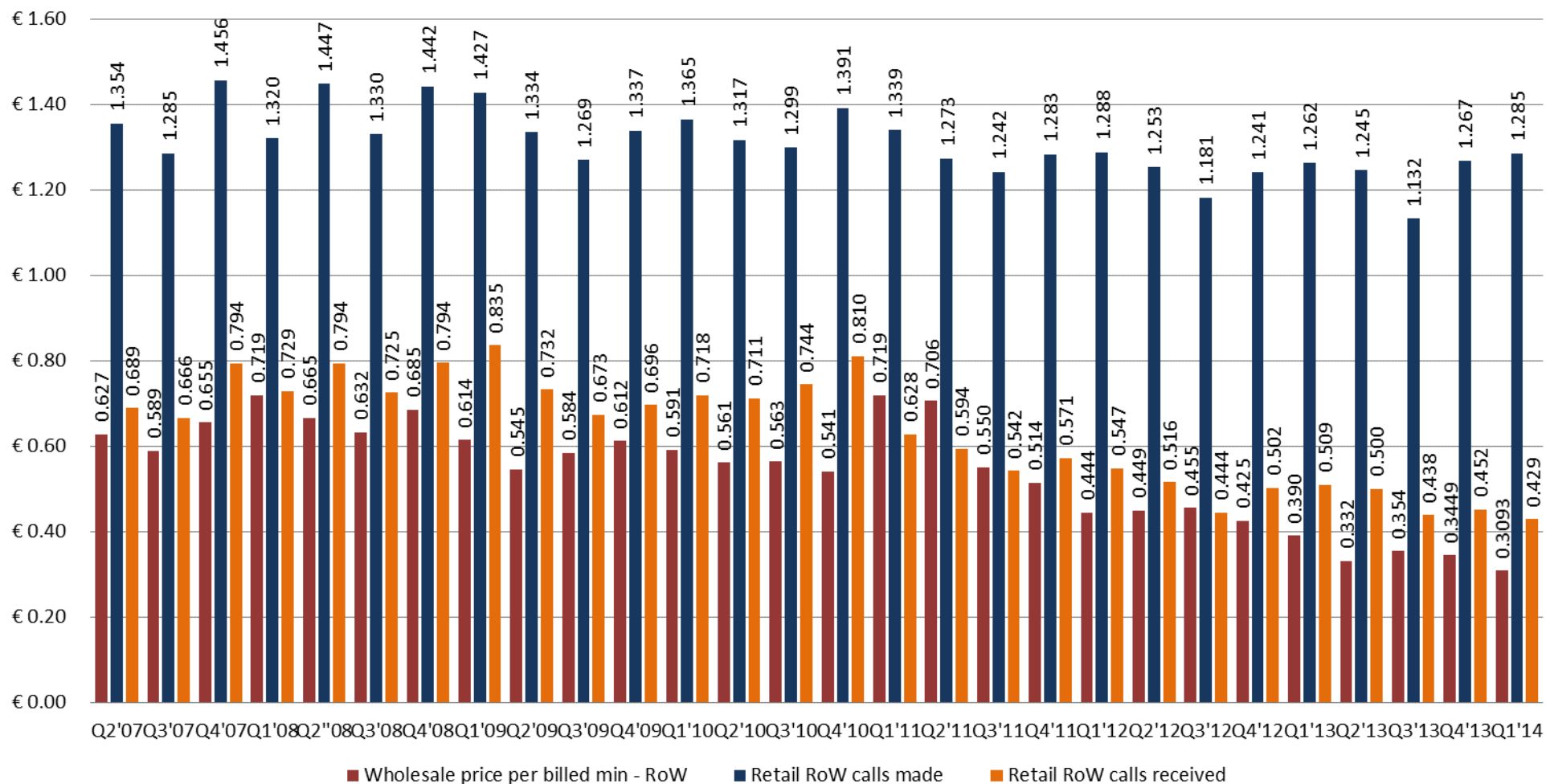


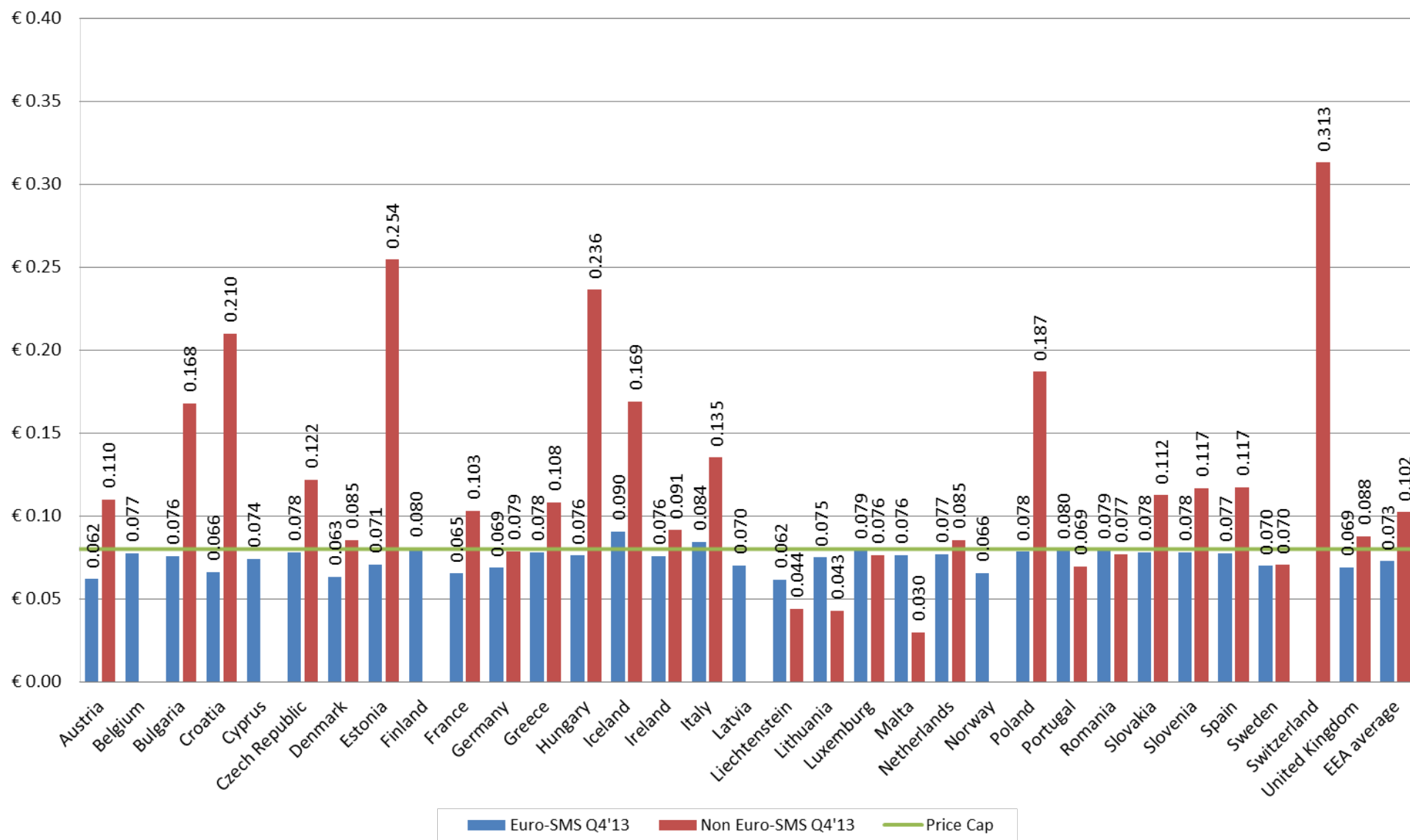
Figure 24: Average wholesale and retail prices for roaming calls made and received by EEA customers outside EEA (EU only for Q2 2009 - Q1 2010)



SMS roaming Services

Retail prices

Figure 25: Average price for Euro-SMS and Non Euro-SMS (prepaid + postpaid)



**Figure 26: Average price for Euro-SMS and Non Euro-SMS
(prepaid + postpaid)**

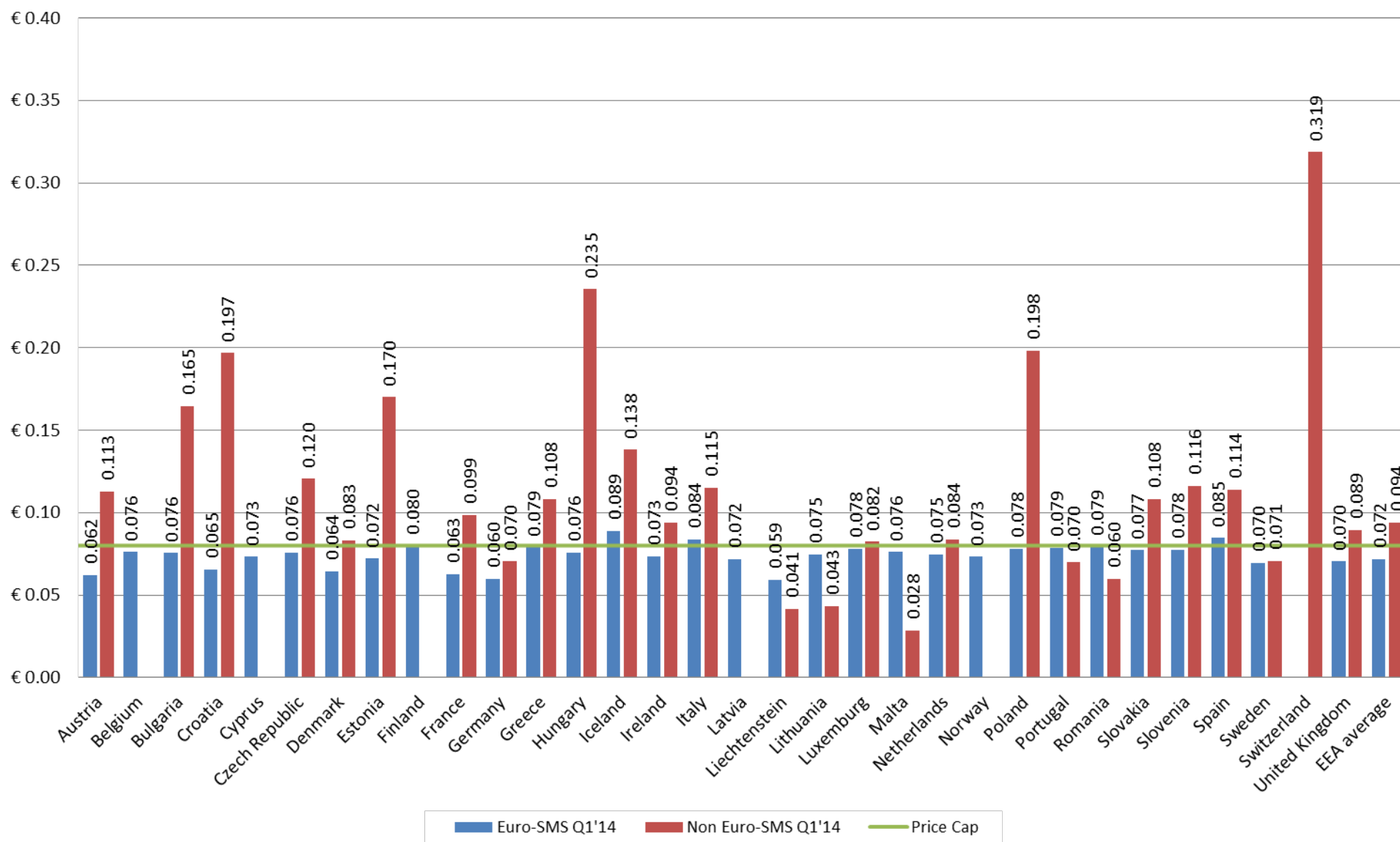
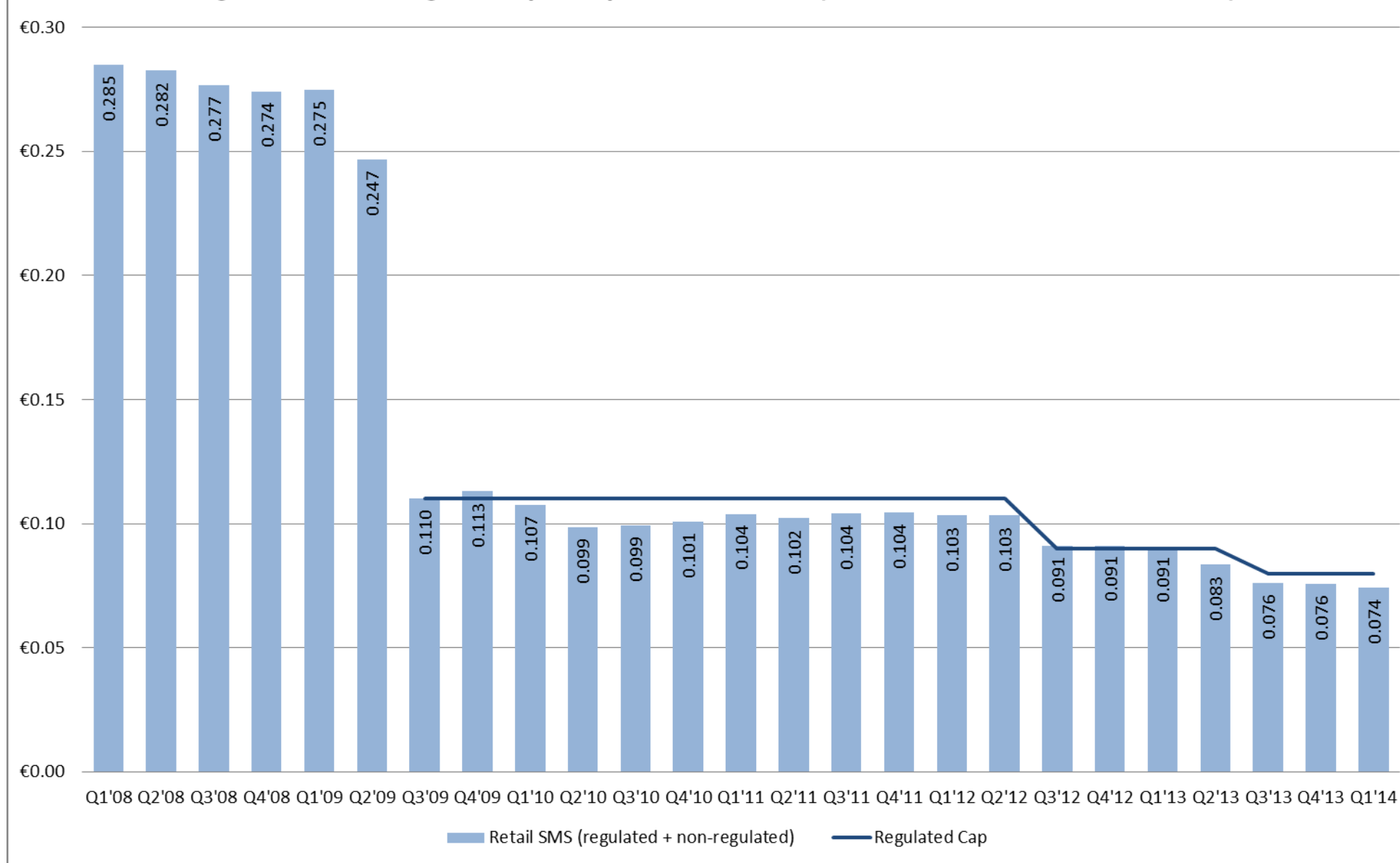


Figure 27: Average EEA price per retail SMS (Euro + Non Euro SMS tariffs)



Wholesale prices

Figure 28: Average wholesale price per intra-EEA roaming SMS: charges to non-group companies

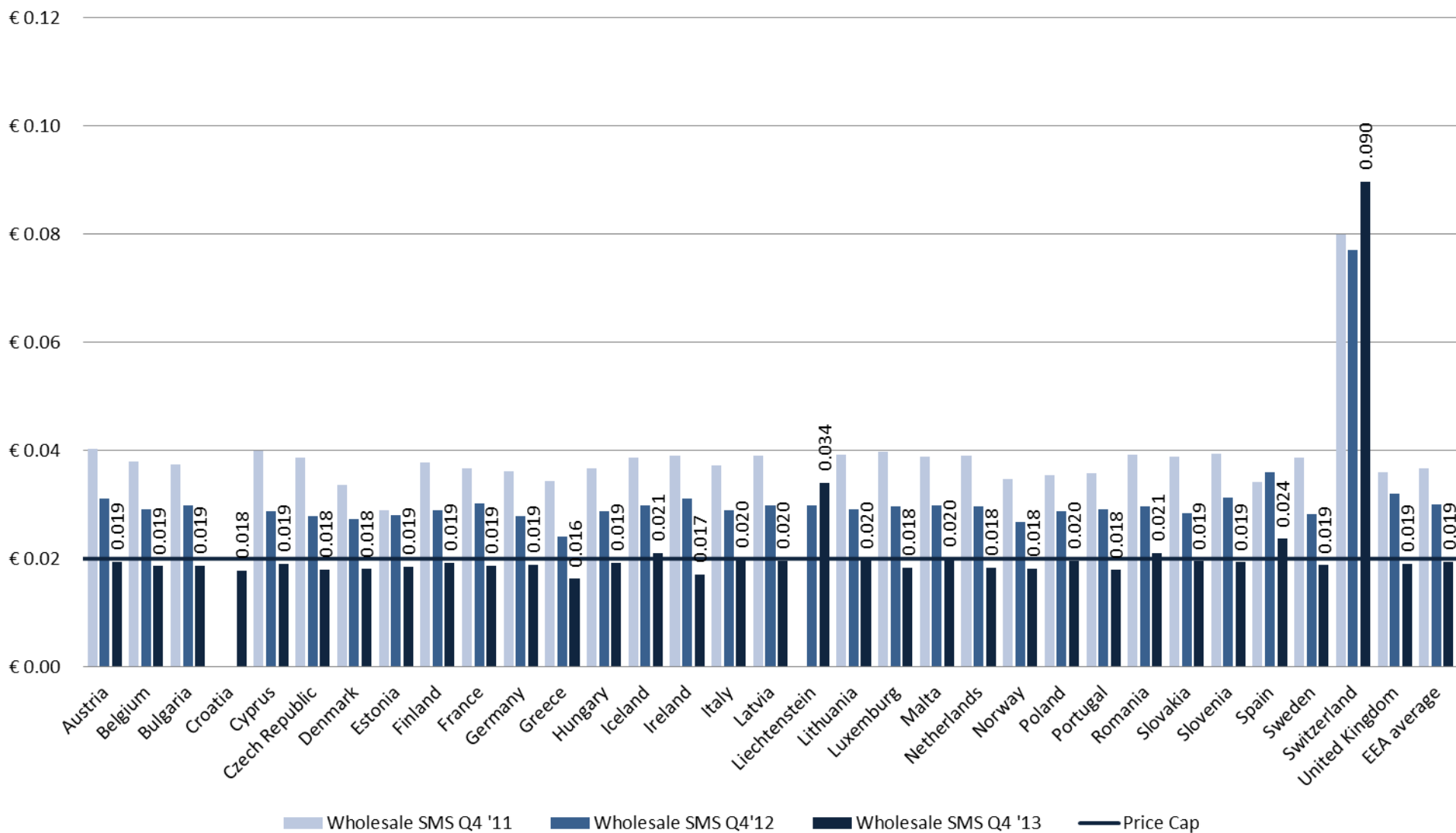
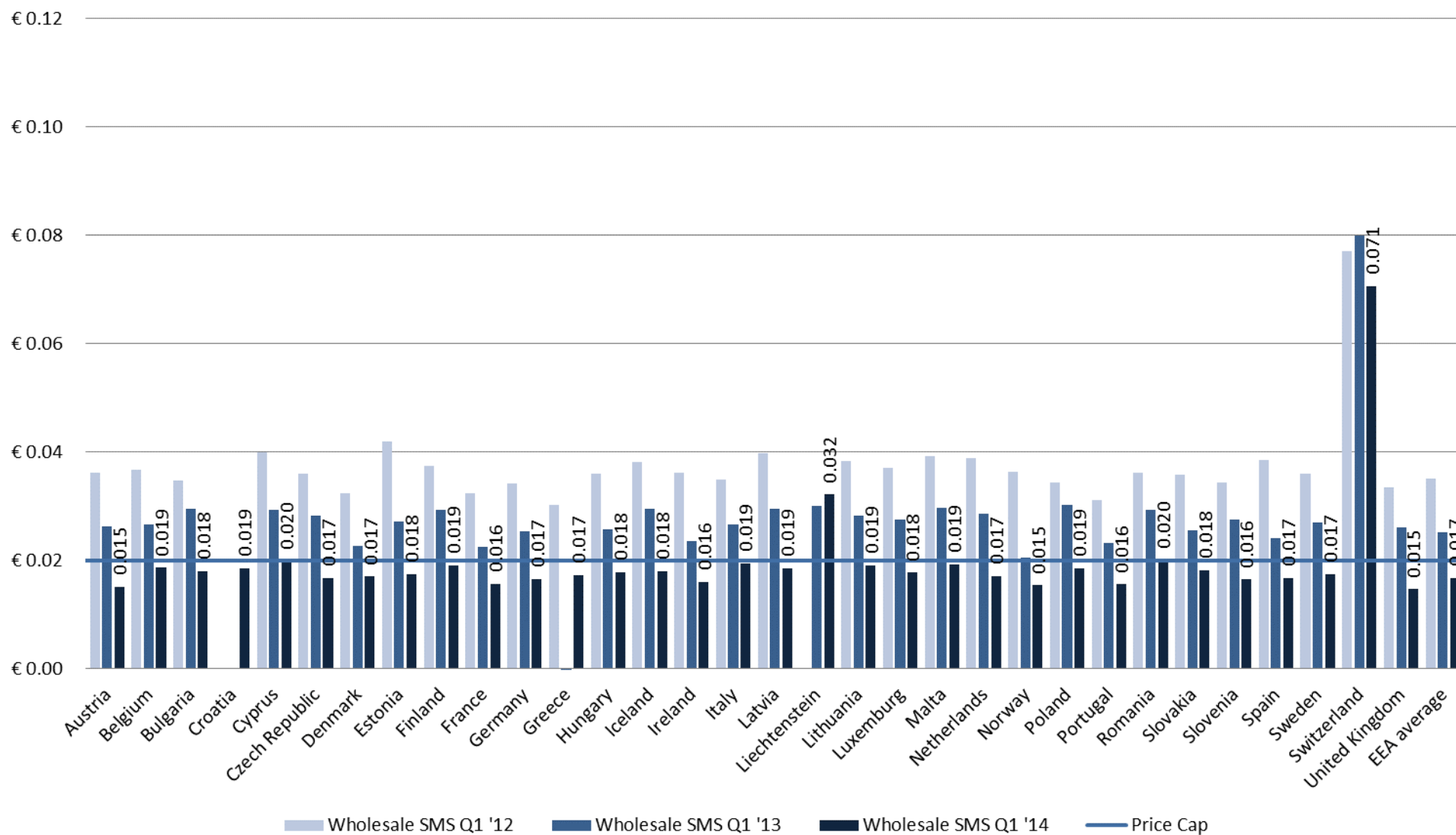
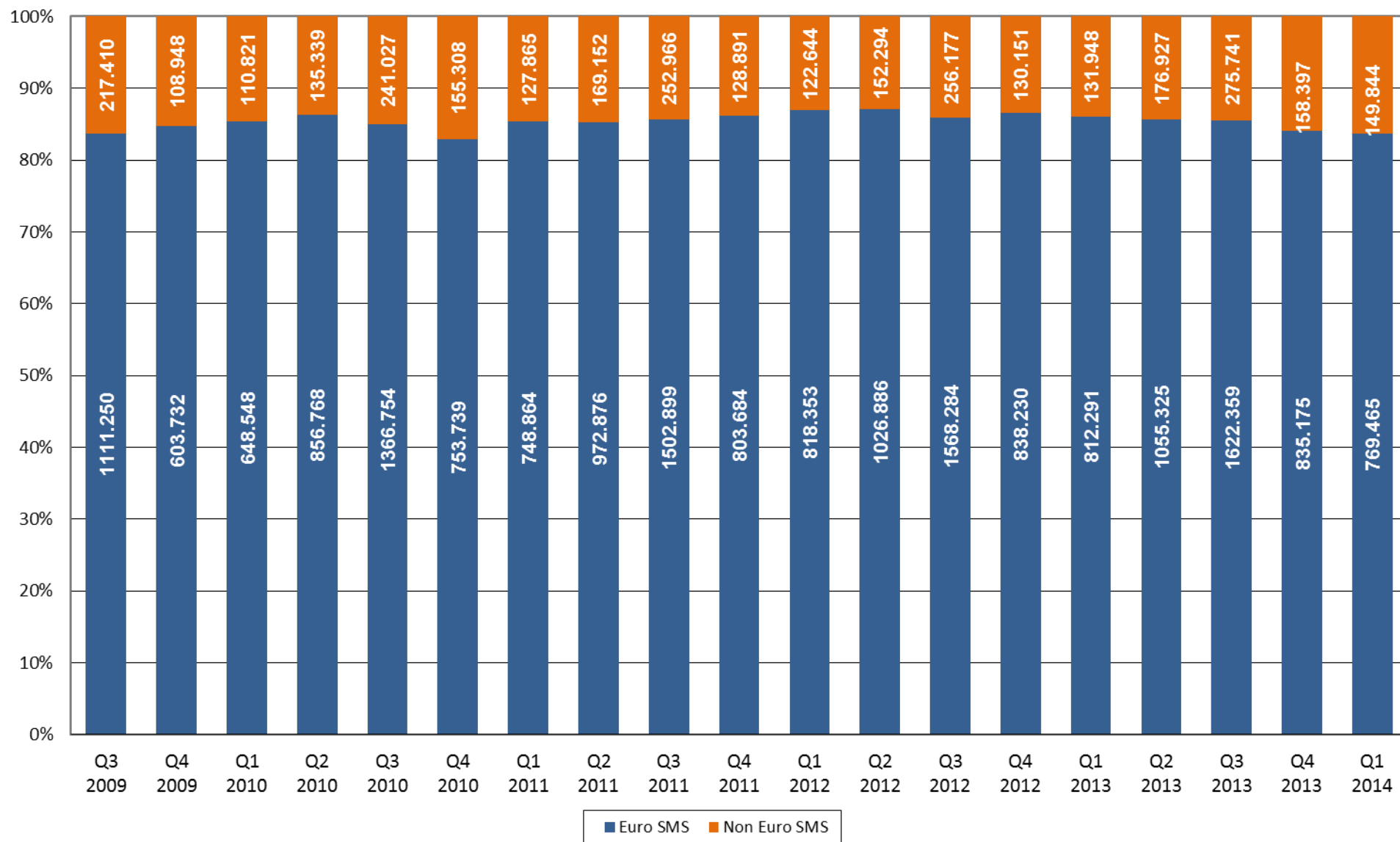


Figure 29: Average wholesale price per intra-EEA roaming SMS: charges to non-group companies



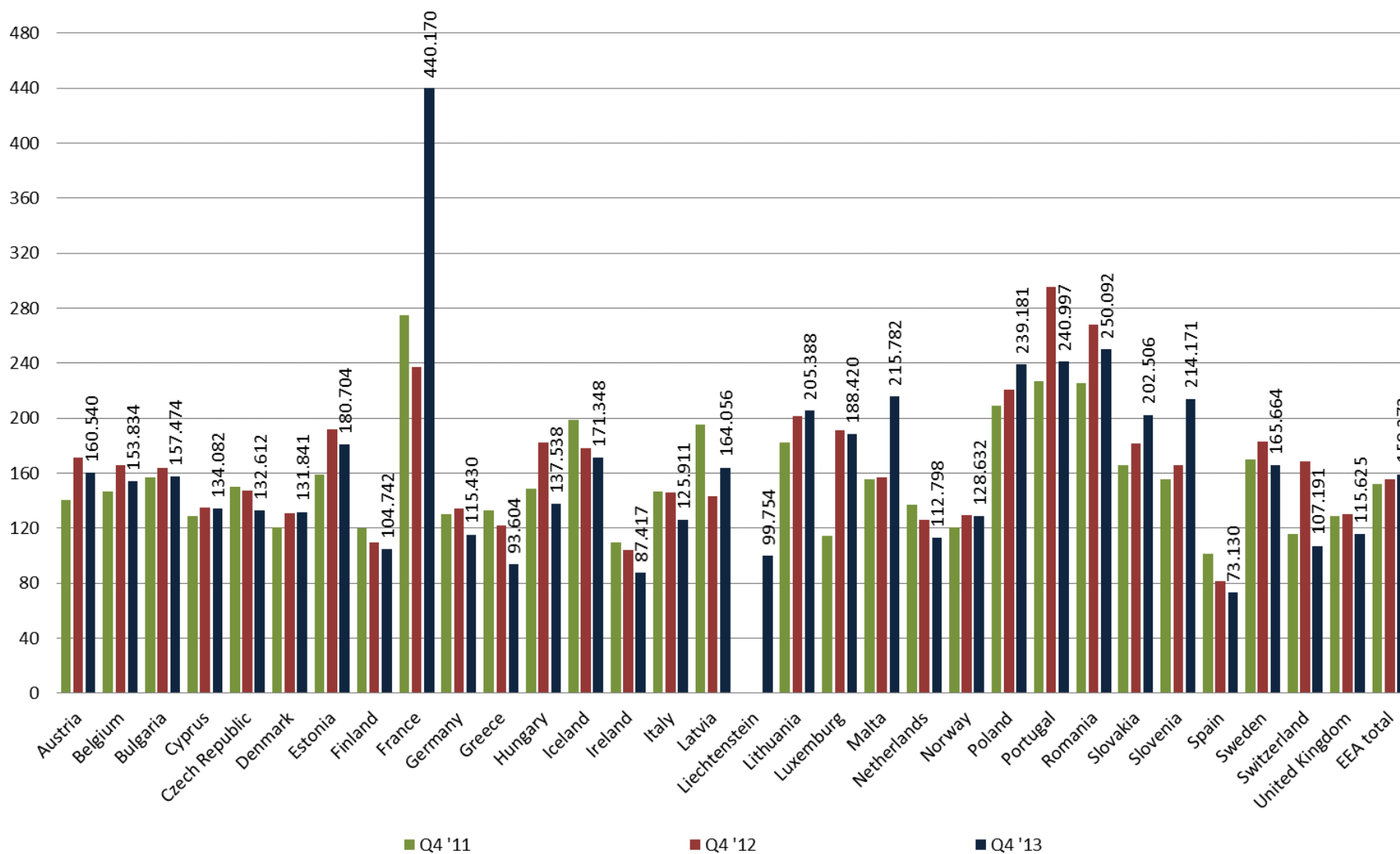
Percentage of SMS from alternative tariffs on total roaming SMS messages

**Figure 30: EEA percentage of SMS messages: Euro SMS and Non Euro SMS
(millions of messages)**



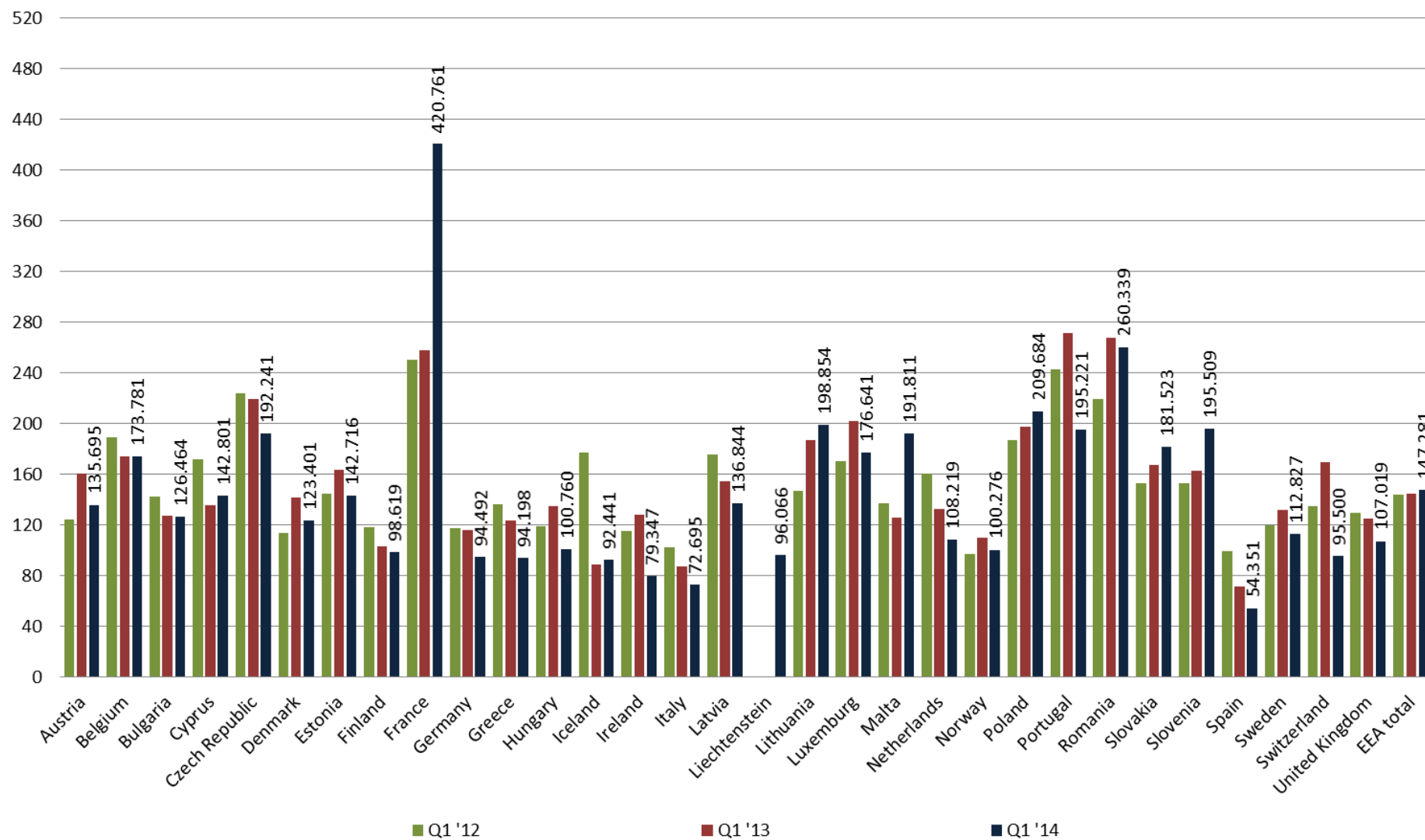
Volumes of retail roaming SMS

Figure 31: Volumes of retail intra-EEA roaming SMS sent in Q4 2013 (Q4 2008 = 100)



Liechtenstein based on Q4 2012 = 100)

Figure 32: Volumes of retail intra-EEA roaming SMS sent in Q1 2014 (Q1 2008 = 100)



Liechtenstein based on Q1 2013 =100

DATA roaming services

Retail prices

Figure 33: Average retail data price per Mb (prepaid+postpaid)

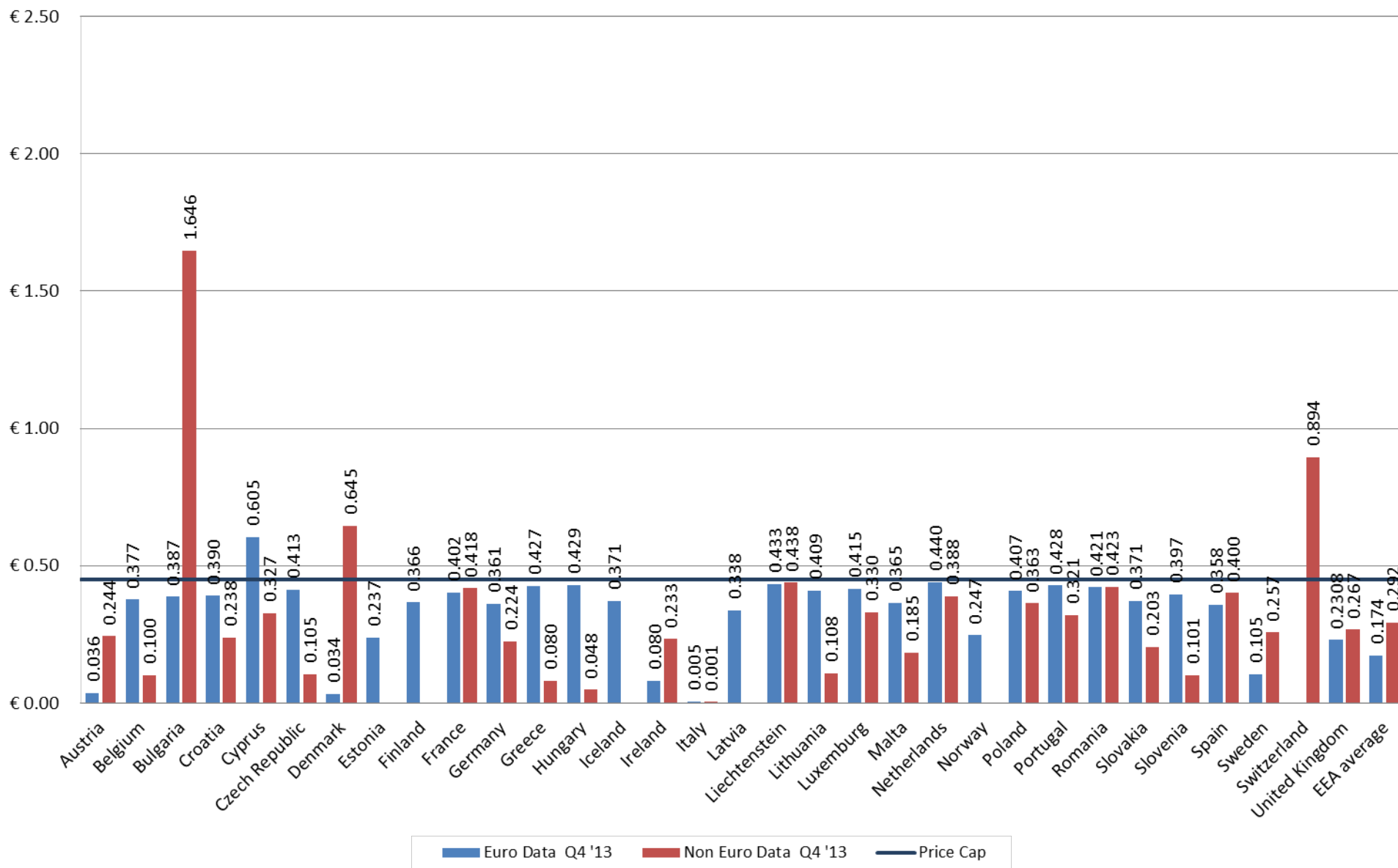


Figure 34: Average retail data price per Mb (prepaid+postpaid)

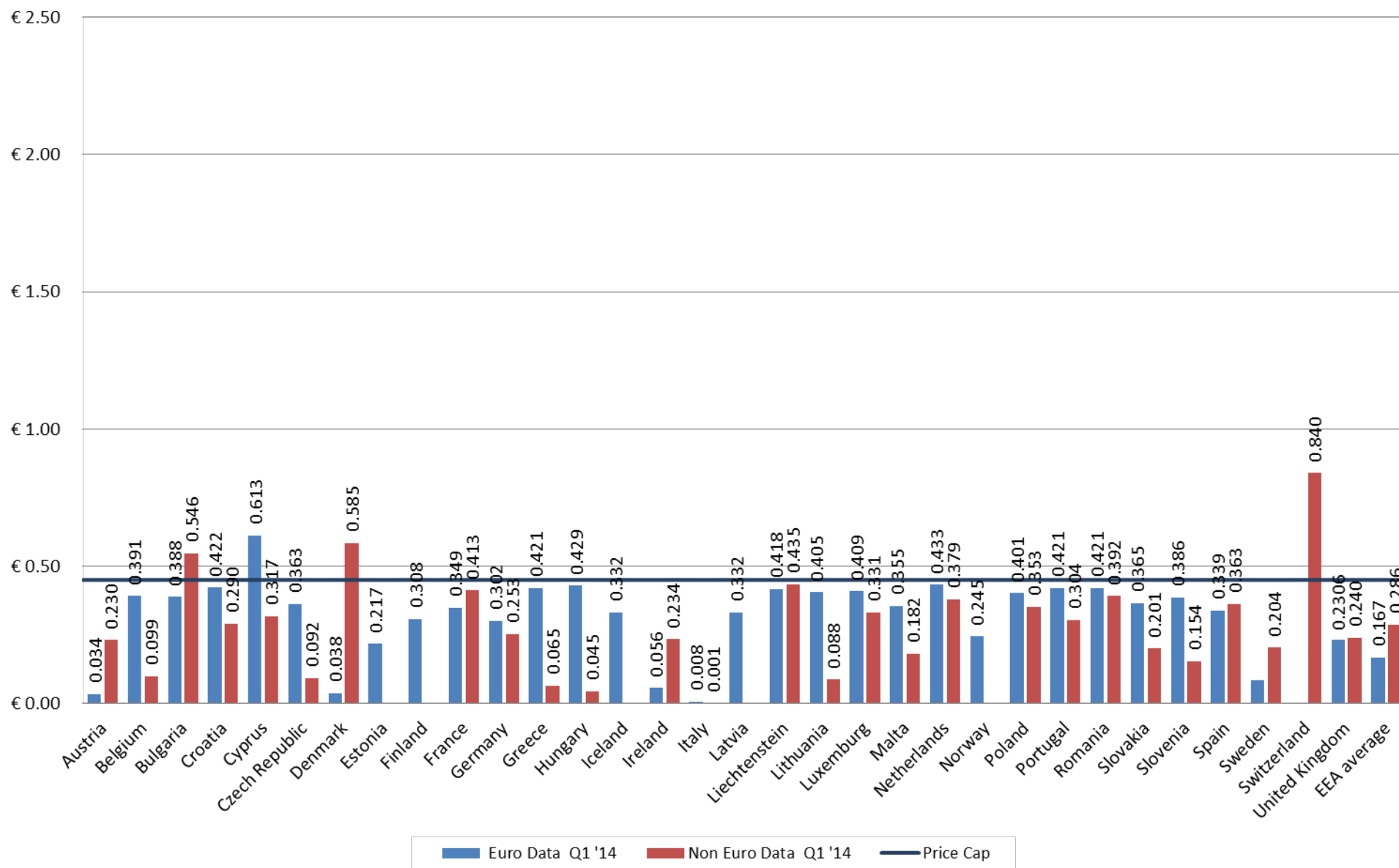
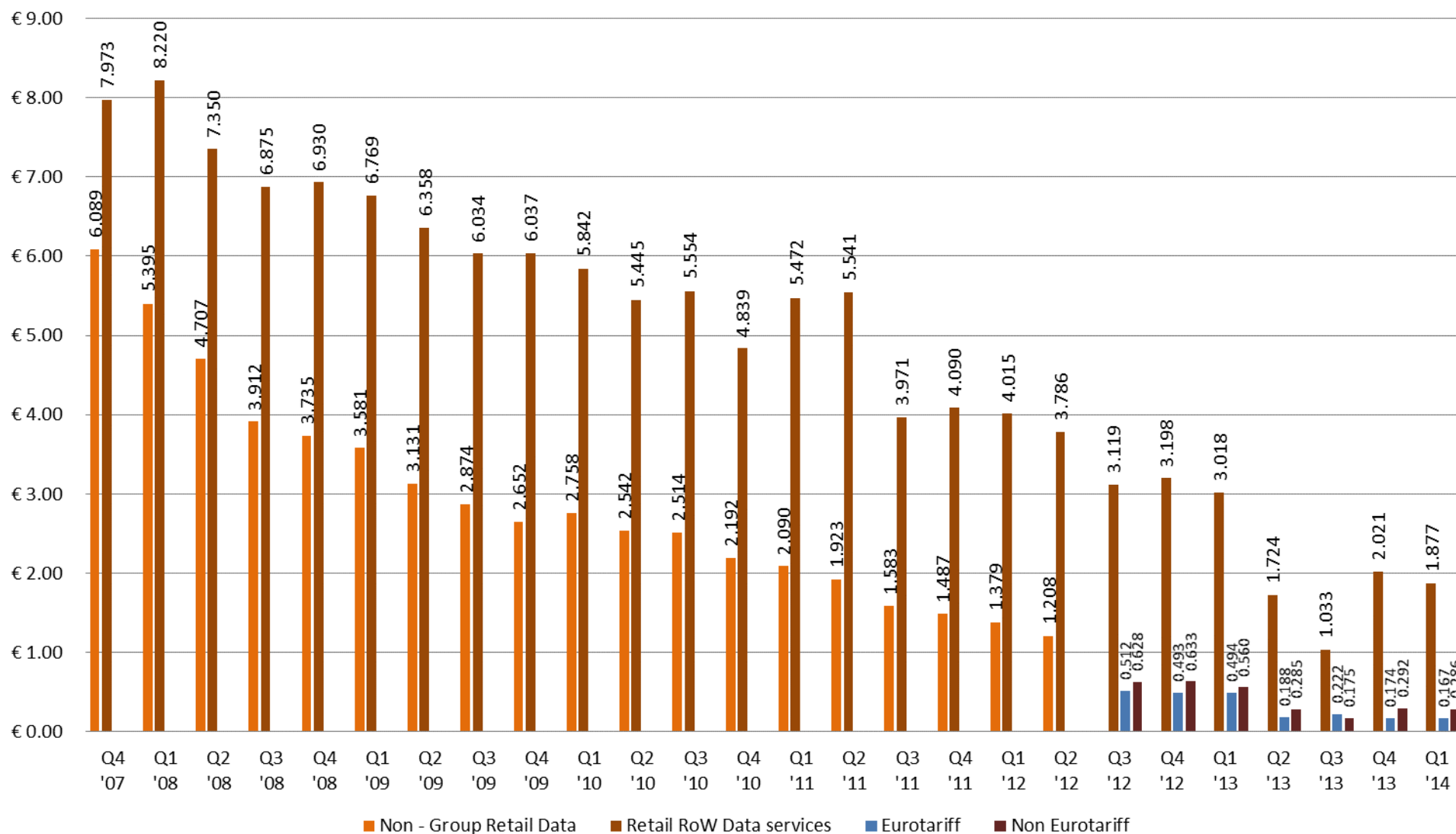
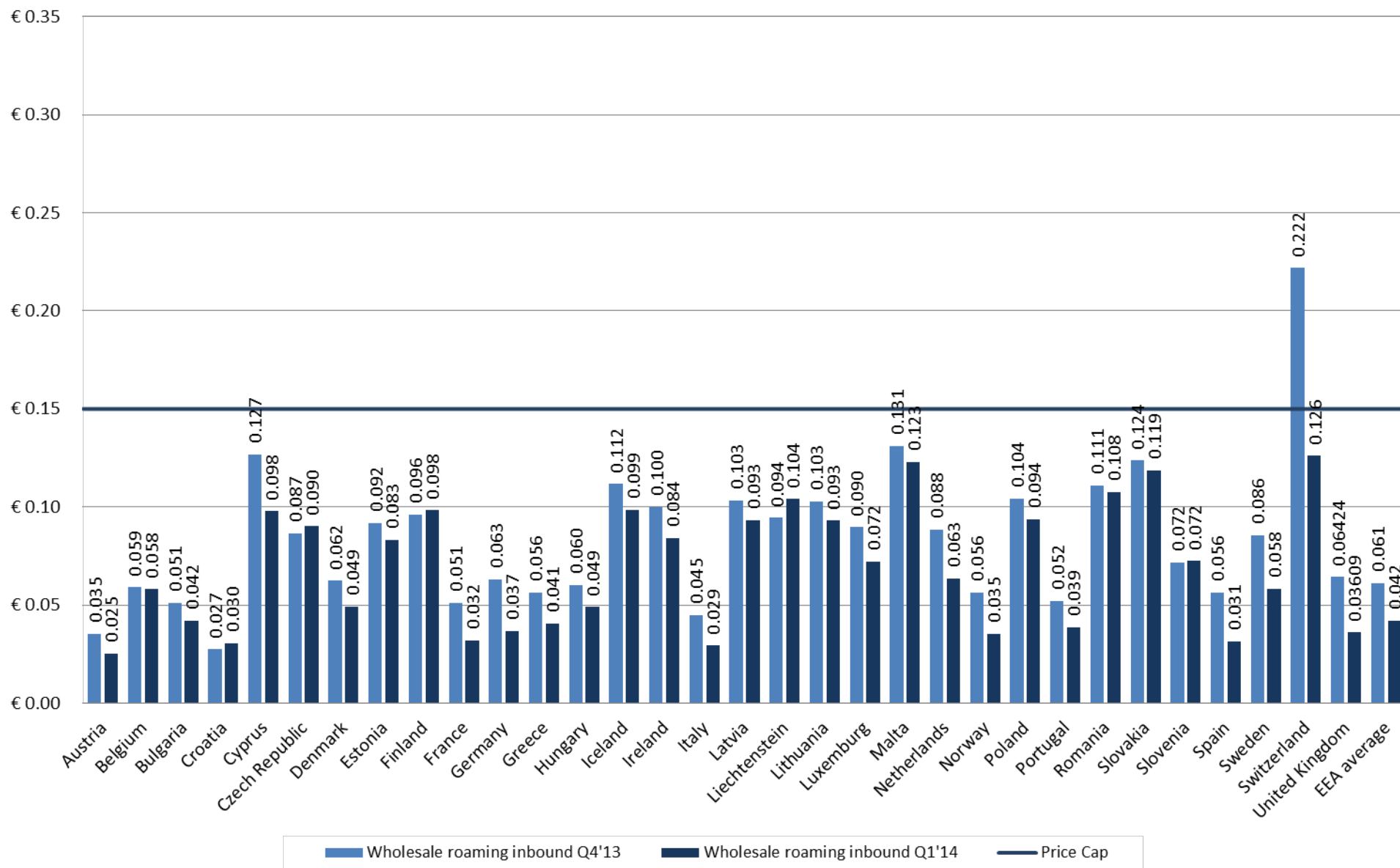


Figure 35: EEA average price per Mb for retail EU/EEA and RoW data (Eurotariff and Non Eurotariff: prepaid + postpaid)



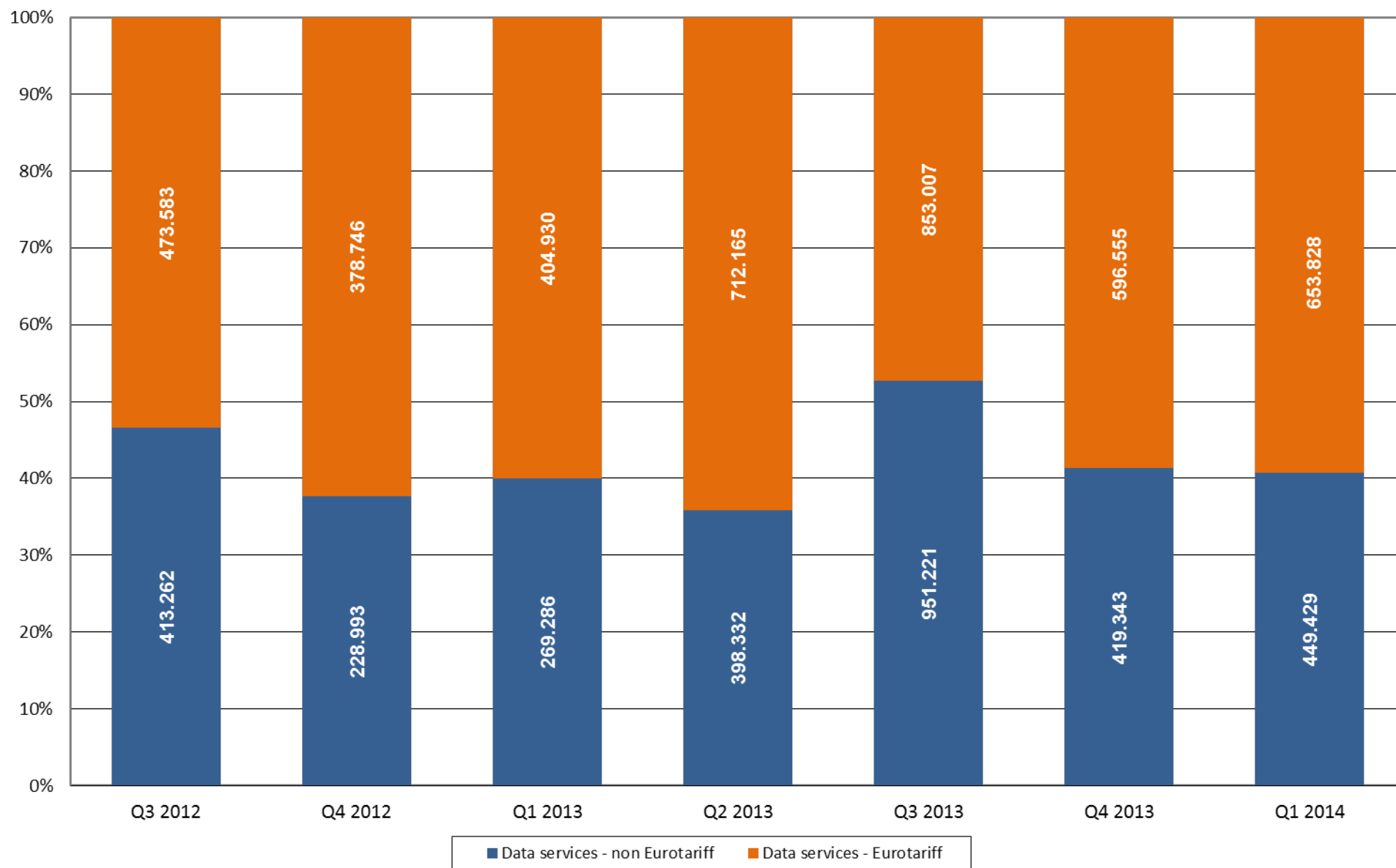
Wholesale prices

Figure 36: Average wholesale data price per Mb (prepaid+postpaid)



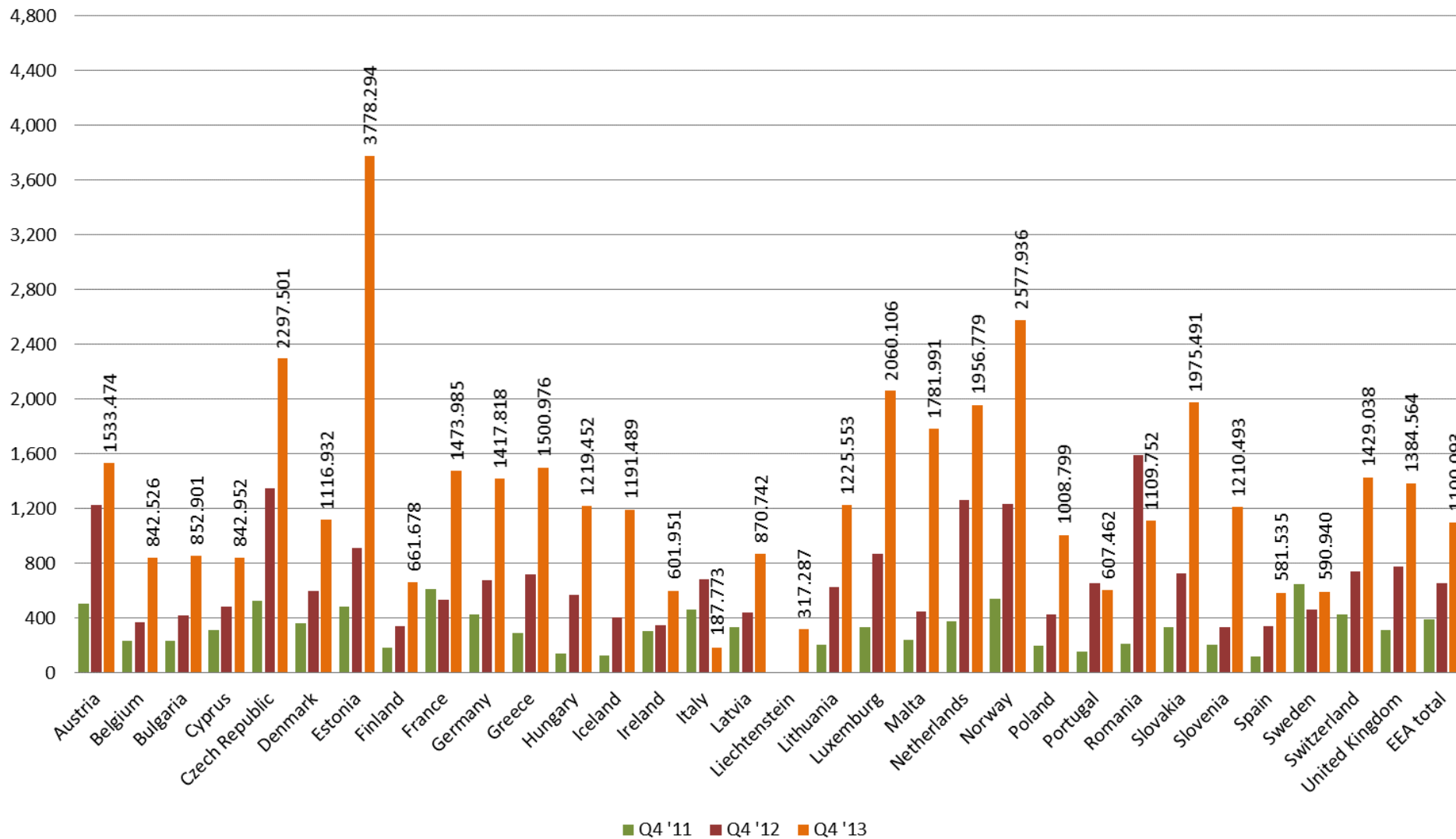
Percentage of volumes of Data from alternative tariffs on total data roaming volumes

Figure 37: EEA percentage of Data service: Eurotariff and Non Eurotariff



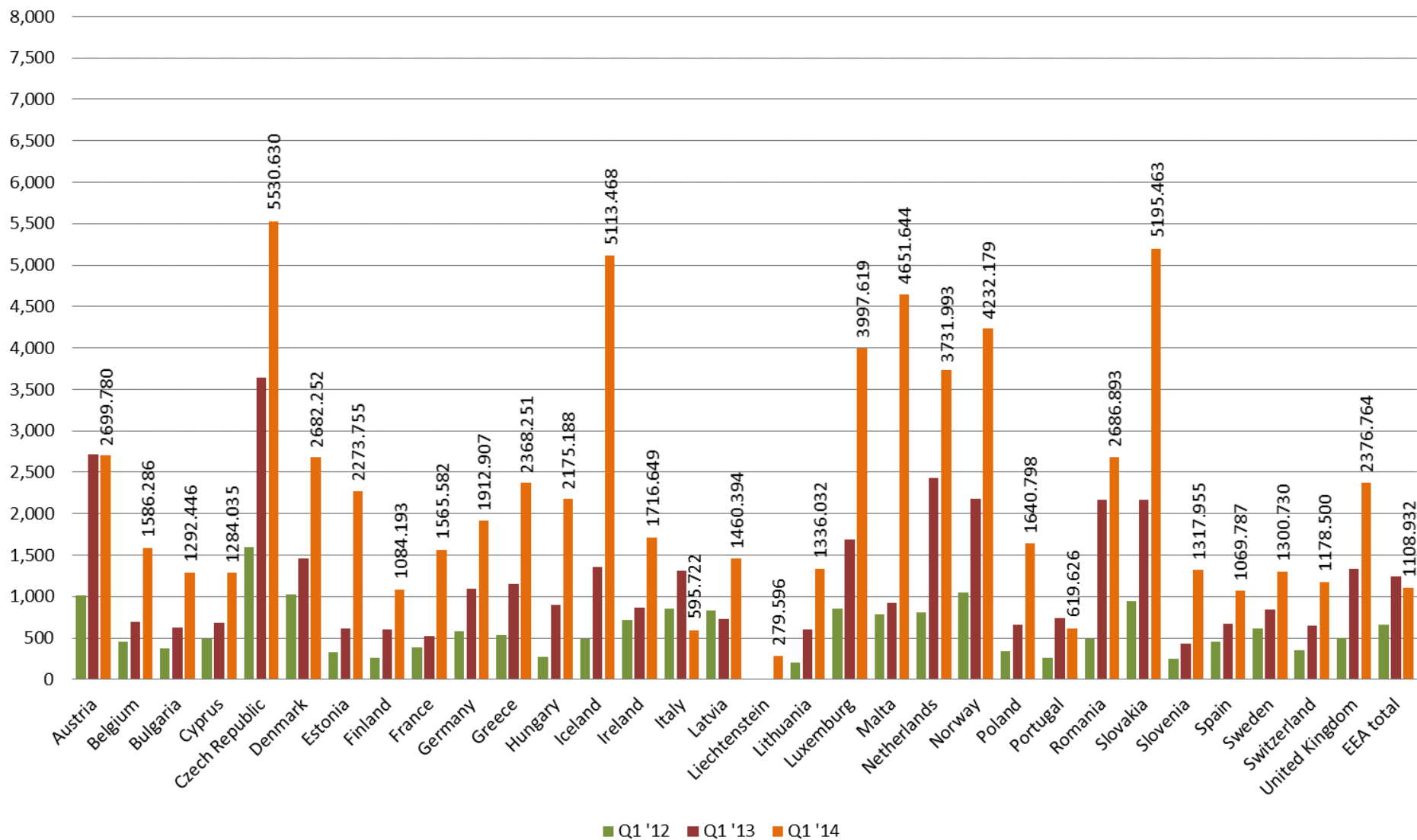
Volumes of retail Data services

**Figure 38: Volumes of retail data in Q4 2013, (prepaid + postpaid)
Index (Q4 2008 = 100)**



Liechtenstein based on Q4 2012 = 100

**Figure 39: Volumes of retail data in Q1 2014, (prepaid + postpaid)
Index (Q1 2008 = 100)**



Liechtenstein based on Q1 2013 = 100

Wholesale roaming (outbound): Agreements applying Article 3 of the Roaming Regulation

Figure 40: Wholesale averages outbound roaming: Voice: Agreements applying Article 3 Roaming Regulation

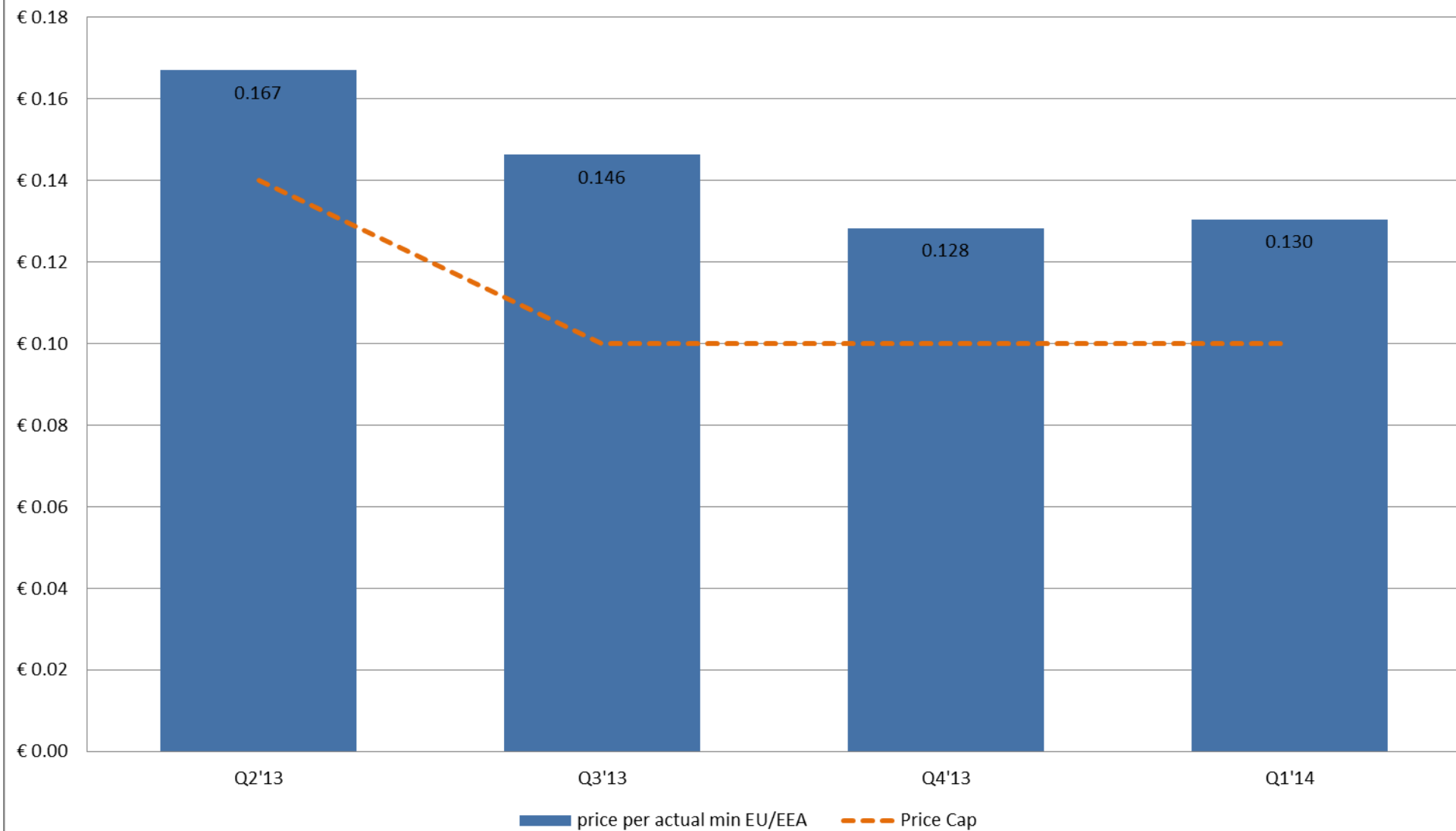


Figure 41: Wholesale averages outbound roaming: SMS Agreements applying Article 3 Roaming Regulation

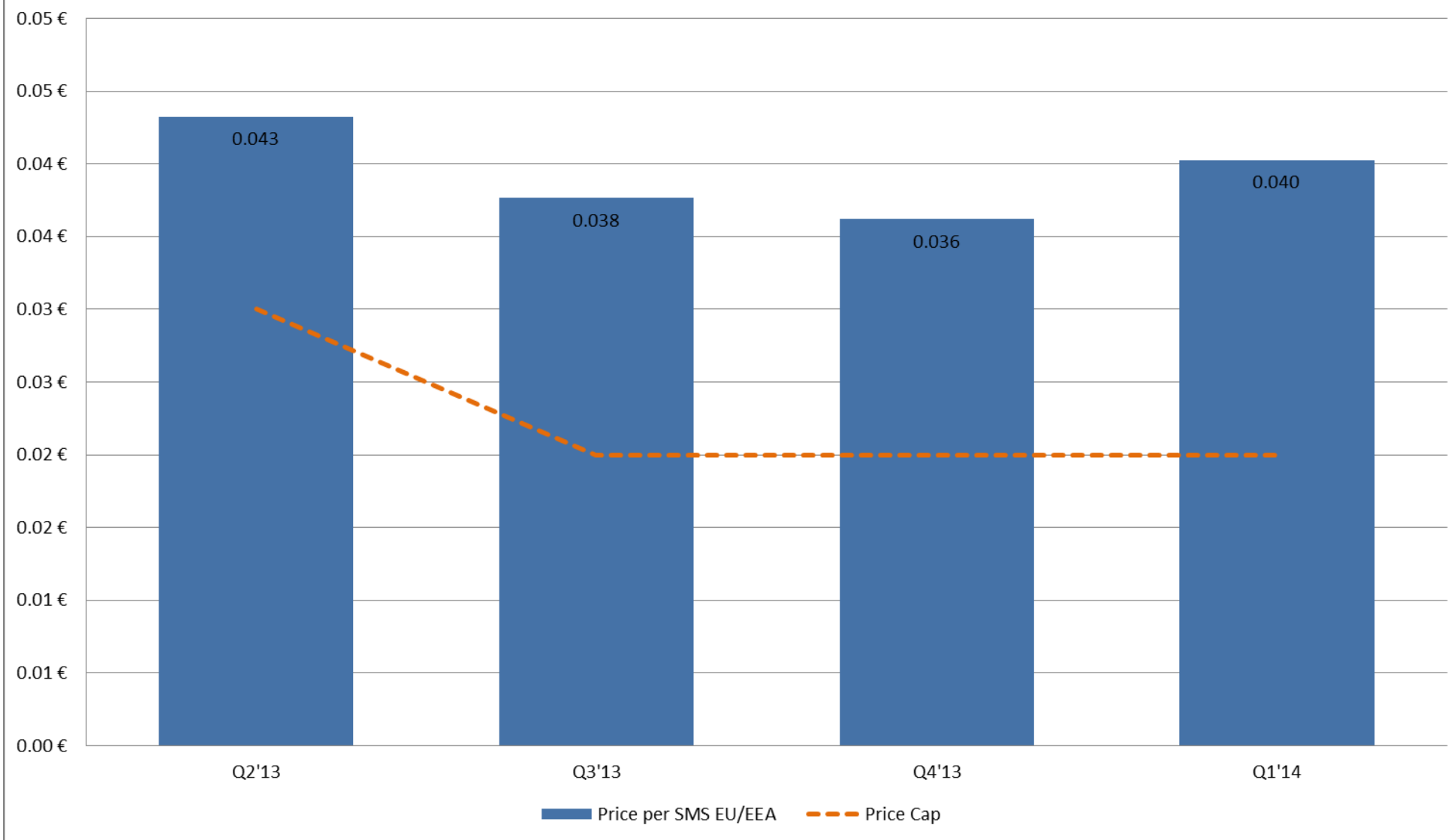
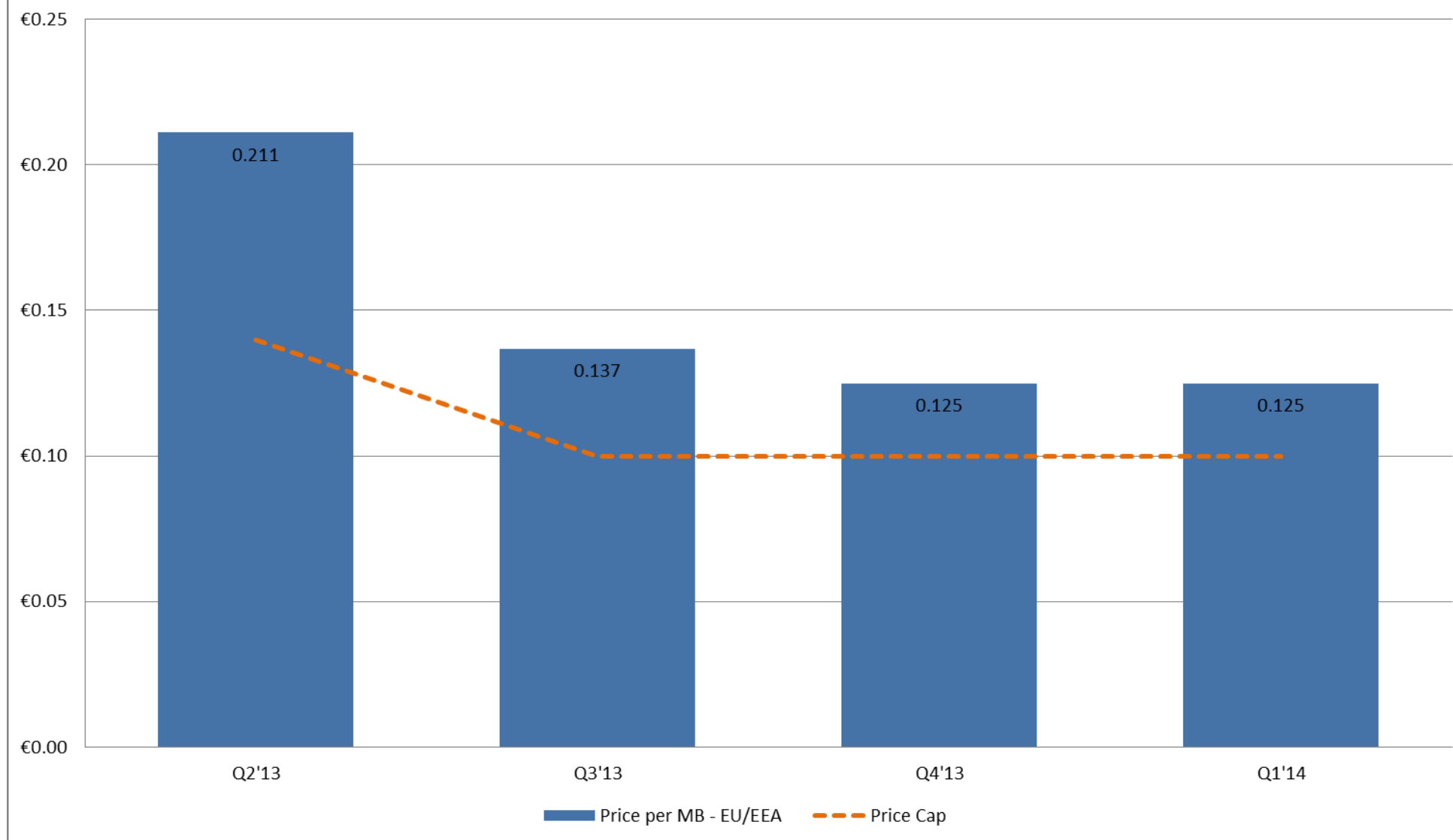


Figure 42: Wholesale EEA average outbound roaming: DATA, Agreements applying Article 3 Roaming Regulation



List of respondents

Operators that provided data for the period 1 October
2013–31 March 2014:

Austria

A1 Telekom Austria
T-Mobile Austria
Hutchison 3G Austria
Lycamobile

Belgium

Belgacom Mobile
KPN Group Belgium (Base)
Mobistar

Bulgaria

Bulgarian Telecommunication Company
(Vivacom)
Cosmo Bulgaria Mobile
Mobiltel

Croatia

Hrvatski Telekom
Vipnet
Tele2

Cyprus

Cyta
MTN Cyprus
Primetel

Czech Republic

BEI MULTIMEDIA INTERACTIVE
Bonerix
CENTROPOL TELECOM
ČEZ Prodej
DH Telecom
Telefónica Czech Republic
TERMS
Tesco Mobile ČR
T-Mobile Czech Republic
Vodafone Czech Republic

Denmark

Hi3G Denmark

TDC
Telenor
TeliaDanmark

Estonia

AS EMT
Elisa Eesti
OÜ Top Connect
TELE 2 Eesti

Finland

Ålands Telekommunikation
DNA
Elisa Corporation
TeliaSonera Finland

France

SFR
Bouygues Telecom
Orange Caraïbe
Orange France
Free Mobile
EI Telecom
Lycamobile
SRR

Germany

E-Plus Mobilfunk
Telefónica Germany
Telekom Deutschland
Vodafone D2

Greece

COSMOTE Mobile
Vodafone Panafon
Wind HellasTelecommunications

Hungary

Telenor Magyarország
T-Mobile
Vodafone Magyarország
Tesco Mobile

Iceland

Nova
Síminn
Vodafone Iceland

Ireland

Eircom Limited/E Mobile
Hutchison 3G Ireland
Meteor Mobile Communications
Telefónica Ireland Limited/(O2)
Tesco Mobile Ireland
Vodafone Ireland

Italy

Carrefour Italia Mobile
Coop Voce
Fastweb
H3G Italia
Noverca Italia
Poste Mobile
Telecom Italia
Tiscali Italia
Vodafone Omnitel
WindTelecomunicazioni

Latvia

Bite Latvia
LatvijasMobilaisTelefons
Tele2

Liechtenstein

Mobikom (Liechtenstein)
Orange (Liechtenstein)
Telecom Liechtenstein

Lithuania

BitèLietuva
Eurocom
Omnitel
Tele2
Teledema

Luxembourg

Entreprise des postes et télécommunications
Post Télécom
Tango
Orange Communications Luxembourg
Luxembourg Online Mobile
Transatel Lux.

Malta

Melita Mobile
Mobisle Communications (GO Mobile)
RedtouchFone
Vodafone Malta
YOM

Netherlands

KPN
Lebara
Lycamobile Distribution
Tele2 Netherlands
T-Mobile Netherlands
Vodafone Libertel

Norway

Telenor
TeliaSonera Norge
Network Norway
Tele2
MyCall
Ventelo
OneCall

Poland

P4
Polkomtel
T-Mobile Polska
Orange Polska

Portugal

CTT – Correios de Portugal
OPTIMUS – Telecomunicações, S.A. (currently NOS Comunicações, S.A.)
MEO – Serviços de Comunicações e Multimédia, S.A. (previously TMN – Telecomunicações Móveis Nacionais, S.A)
Vodafone Portugal – Comunicações Pessoais. S.A.
ZON TV Cabo Portugal, S.A. (currently NOS Comunicações, S.A.)
LycaMobile Portugal,Lda
Mundio Mobile (Portugal) Limited

Romania

Cosmote RMT

Orange Romania
RCS&RDS
Vodafone Romania

Slovak Republic

O2 Slovakia
Orange Slovensko
Slovak Telekom

Slovenia

Debitel
Izi mobil
Telekom Slovenije
Si.mobil
T-2
Tušmobil

Spain

Euskaltel
Orange
TelefónicaMóviles de España
Vodafone
Yoigo

Sweden

Hi3G Access
Tele2 Sverige
Telenor Sverige
TeliaSonera

Switzerland

Orange Communications
Sunrise Communications
Swisscom (Schweiz)

United Kingdom

3 UK
O2 UK
Everything Everywhere
Vodafone UK
Tesco Mobile
Virgin Mobil