

BEREC Report on Transparency and Comparability of International Roaming Tariffs

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Executive summary and main findings

This report gives an overview about the transparency and comparability of retail roaming tariffs to inform the customer of their availability. In August 2017 BEREC sent a questionnaire to operators and the National Regulatory Authorities (NRAs) in order to gather information on two aspects that are key issues for customers when selecting tariffs for international roaming services: firstly, transparency, meaning the availability of clear information about prices and conditions for each tariff, as well as simple procedures for customers to switch between tariffs; and, secondly, the comparability of tariffs. By comparability BEREC means the ability for customers to compare different types of tariffs offered by operators and to select the one best suited to their needs and patterns of consumption. Furthermore, this report covers the results of the questionnaire regarding the implementation of “Roam Like at Home” (RLAH) with a fair use policy.

In the questionnaire for NRAs, BEREC focused on information about complaints received by NRAs on transparency issues since July 2016. BEREC included specific questions about those complaints received from 15 June 2017, related to the application of RLAH and associated fair use policies. BEREC asked for any information about tariff comparison tools that may be offered by different organizations such as customer associations, recommendations available for customers on how to select the most adequate tariff and any tools and hints for customers to estimate data traffic that may be facilitated by NRAs and any third party (i.e. consumer) associations. Furthermore, the questionnaire requested information from NRAs about the number of operators that asked to apply a surcharge as they cannot provide RLAH on a sustainable basis and associated information on the level of the surcharges that are granted.

The questionnaire for operators was directed at seeking information about tariff structures offered, including RLAH, RLAH+¹, alternative roaming tariffs and those tariffs where roaming is not offered any longer since RLAH is in force. Moreover, BEREC has collected information about the fair use policies implemented by roaming providers and information given to customers on the use of the tariffs and their fair use policies. Other questions were directed at how to switch between tariffs as well as information and tools for comparing tariffs and estimating consumption and information on the “welcome SMS”.

Transparency is the key issue which enables customers to take informed decisions. According to the Roaming Regulation customers should have easy access to understandable information on prices and conditions for each existing roaming tariff including its fair use policy if it is applicable. According to the Regulation, it should also be possible to switch between roaming tariffs quickly and conveniently.

When BEREC asked whether NRAs had received consumer complaints about transparency, 76 % of the responding NRAs said that they had received complaints on transparency issues, which shows an increase compared to the previous period, where only 58 % of the responding NRAs reported receiving such complaints. Most complaints were from customers not knowing

¹ Since 15 June 2017 (implementation of RLAH), RLAH+ refers to those operators who have the authorisation to apply a surcharge according to the sustainability mechanisms or it refers to those users that exceeded the roaming allowance or did not comply with the fair use policies.

that international calls (calls from their home country to another EEA country) and roaming on planes/ships are not covered by the Regulation, and customers not knowing that they were on an alternative tariff. Such complaints were received by 43 % of the NRAs. RLAH got implemented in the EEA on 15 June 2017, eight of the total of NRAs that received complaints had received complaints about the application² of the fair use policies (FUP).

Regarding the opportunity to switch between tariffs, providers reported that they mainly informed their customers via call centres, at a point of sale, through information on their website or by sending them a notification directly to their mobile device (i.e. SMS).

Providing data on real-time consumption for roaming services is typically dependent on the collaboration between the domestic network and the visited network. Therefore, the domestic network is not always able to provide information on real-time consumption of all services. The most common way for providers to supply data on (near) real-time consumption is via call centre agents (73 %). The second most common way is by interaction via the mobile phone using short codes (56 %) and the third is the use of a specific app available for installation in the terminal (55 %).

Customized applications available on smartphones or tablets are getting more and more popular compared to last year. Applications for accessing historical and real-time information are offered by many providers (55 % of all providers offer apps for historical data and 62 % for real-time data).

BEREC furthermore collected information on fair use policies implemented by European roaming providers in their tariffs after 15 June 2017.

Limits on open data bundles are applied by 69 % of the responding providers. Among the providers that apply a limit on open data bundles, more than half of them (59 %) have implemented a data limit for every tariff plan classified as "open data bundle" while the rest of them answered that they have implemented a data limit only to a subset of such tariffs.

75% of the roaming providers that have implemented the control mechanism said that they implemented the control mechanism for every tariff plan. The control mechanism allows operators to monitor roaming services for a period of four months. If the customer is using more roaming services than domestic services and is more abroad in another Member State than in the home country in these four months, the operator is entitled to charge a surcharge on the domestic price when roaming. Most of the operators answered that they were monitoring all types of roaming services (voice, SMS and data).

59 % of the roaming providers answering the questionnaire apply the stable link criterion to every tariff plan. This means that customers have to prove that they have a stable link (in form of e.g. full-time and durable employment relationship, participation in full-time recurring courses of study, durable contractual relations, etc.) in the country of the domestic network. Other objective indicators such as long inactivity of a given SIM card and subscription and

² Since the deadline for answering the questionnaire was 1 September, the answers related to complaints on the fair use policy and on the implementation of RLAH refer to a shorter period of time from 15 June to 1 September 2017.

sequential use of multiple SIM cards by the same customer have been implemented by 40 % of the operators.

Another question dealt with the information provided by the operators about the fair use policy: 73 % of roaming providers who implemented a fair use policy inform their customer about the overall roaming allowance or about how it is calculated. 73 % of the roaming providers state that they provide information within the observation period.

With regard to the different types of roaming tariffs that are offered by operators, the Report shows that 49 % of the responding operators include non-EEA destinations in some of their offers, and 40 % include non-EEA destinations in their alternative tariffs. Alternative tariffs are provided by 35 % of operators in the form of monthly packages.

Less than half of the roaming providers offer tariffs without roaming (47 %) and 27 % of operators answered that they withdrew roaming services from their tariff plans.

In specific and exceptional circumstances in order to ensure the sustainability of its domestic charging model, roaming providers may apply for authorisation to apply a surcharge, in the case that they are not able to recover their overall actual and projected costs of providing regulated roaming services in accordance with the Roaming Regulation. According to the answers received by BEREC, 16 NRAs have received applications for sustainability surcharges with a total amount of 53 applications received by the end of August 2017. From those, 30 of the applications were granted, 12 were still pending, and 11 applications were refused. About the level of surcharges granted by NRAs, according to the information BEREC received, six of them reported that they had set surcharges at the wholesale caps while three had granted surcharges below the wholesale caps.

Regarding the availability of tables and/or tools for comparing different tariffs, only 34 % of the providers that actually offer alternative roaming tariffs provide tables for comparing these tariffs with regulated roaming tariffs.

Customers should be able to select the most suitable tariff based on their own estimated pattern of consumption. In this regard, approximately one third of the responding operators say they provide information and tools to estimate data consumption. Some operators provide tools or applications to help consumers select the most adequate domestic tariff for their pattern of consumption and a few NRAs and consumer associations have such tools for comparing tariffs between operators. It is important that terms and conditions on EEA roaming are included in such tools, and that this is done in a clear and informative way.

BEREC asked operators if they inform their customers when they enter another Member State about prices ("Welcome SMS"). 6 % of the respondents answered that they still do not send the "Welcome SMS" to their subscribers, although this obligation has been in force since 2007.

BEREC will repeat this exercise according to Article 19 of the Roaming Regulation each year to collect information with which the European Commission can assess the evolution and advances in increasing the transparency and comparability of tariffs.

1. Introduction and objectives of the document

The market for electronic communications has been providing a steadily increasing number of offers. Accordingly, users may find it more difficult to compare the various offers as well as to compare the performance parameters of different services. Specific tools to measure consumption could help to create certainty about the offers in order to allow customers to assess and compare prices and offers. Regarding service providers, these tools may help them to differentiate their offers more clearly. Especially in case of data services, considering the increased use of smartphones and tablets, the availability of applications for the most common operating systems would enable customers to take informed decisions based on their patterns of consumption. Since RLAH is in force (15 June 2017), roaming providers have to inform subscribers about those fair use policies implemented in their tariffs.

The selection of an alternative tariff should take into account the possibility to use the regulated tariff and the conditions for the alternative tariff chosen. Such an awareness, together with policies and instruments, which allow customers to estimate their consumption and compare international roaming tariffs, will lead to better informed customer decisions.

This Report takes into account the amendments of the Regulation (EU) No 531/2012 on roaming on public mobile communications networks within the Union by the TSM Regulation, (hereafter "Roaming Regulation"). It deals with both, the transitional period but also with the implementation of RLAH. With effect from 15 June 2017, roaming providers shall not levy any surcharge in addition to the domestic retail price on roaming customers in any Member State for any regulated roaming calls made or received, for any regulated roaming SMS messages sent and for any regulated data roaming services used, including MMS messages, nor any general charge to enable the terminal equipment or service to be used abroad, subject to Articles 6b and 6c. Furthermore, the switch from or to the regulated roaming tariff (default tariff, since 15 June the regulated roaming tariff is RLAH) pursuant to Article 6e (3), subparagraph 3 has to be made free of charge within one working day. This provision also applies in the transitional period.

In addition, this Report shows the answers of roaming providers received about their implementation of the Commission Implementing Regulation (EU) 2016/2286 of 15 December 2016 laying down detailed rules on the application of a fair use policy and on the methodology for assessing the sustainability of the abolition of retail roaming surcharges and on the application to be submitted by a roaming provider for the purposes of that assessment (hereafter "CIR"). CIR defines those fair use policies that roaming providers may implement for the roaming regulated tariff and establishes the sustainability mechanism to authorize retail roaming surcharges by NRAs.

In line with the provisions set out in the Roaming Regulation, the report has the following objectives:

- To investigate specific problems which prevent or impede customers from taking informed decisions. As part of this objective, the report aggregates collected information with which the Commission is able to assess whether offers are transparent, and to investigate transparency issues concerning charges which may be applied and other billing issues.

- Comparability of tariffs. Under this objective, the report aggregates collected information with which the Commission is able to assess how easy/difficult it is for customers to compare different roaming tariffs, especially to compare the regulated tariff with alternative tariffs, and to identify whether customers are able to take informed decisions in order to select the most suitable tariff based on their needs. The report also includes an overview of the different structures of roaming tariffs offered by mobile operators.

2. Information collected by BEREC

In order to investigate whether customers face transparent conditions (in the transitional period and later with RLAH), and if they are able to compare different tariffs, BEREC prepared two questionnaires each addressed to operators and to NRAs respectively.

With regard to assessing the transparency of market conditions, the questions focused on the availability of roaming tariffs and the conditions applied (price limitations in terms of volumes or the geographical area, or any other restrictions as well as any linkages to domestic tariffs or fair use policies etc.). Operators were also asked whether they provided transparent information about the start and end of a specific period for a given, time-limited tariff, any possible tariffs/charges when a bundle is exhausted and itemisation of bills. In addition, operators were asked about the implementation of a fair use policy in their tariffs and about the RLAH implementation. NRAs were requested to provide any information on customer complaints concerning any alleged lack of transparency.

With regard to assessing the comparability of tariffs, BEREC's attention was focused on the availability of tools, applications and any information facilitating the selection of the most adequate roaming tariff to suit the customers' patterns of consumption.

A total of 30 NRAs sent their responses to BEREC and BEREC received a total of 160 responses from mobile providers operating in EEA countries. 64 % of the responses corresponded to MNOs and 36 % to full MVNOs or light MVNOs and resellers, as shown in Figure 1.



Figure 1: Type of mobile providers responding to the BEREC questionnaire

3. Structure of tariffs

3.1. RLAH with FUP

Pursuant to Article 6a Roaming Regulation, with effect from 15 June 2017, roaming providers shall not levy any surcharge in addition to the domestic retail price on roaming customers in any Member State for any regulated roaming calls made or received, for any regulated roaming SMS messages sent and for any regulated data roaming services used, including MMS messages, nor any general charge to enable the terminal equipment or service to be used abroad, subject to Articles 6b and 6c.

BEREC has collected information from operators regarding the structure of default regulated tariffs, pursuant to Article 6a of the Regulation. In particular, BEREC was interested in whether operators apply an open bundle data limit, whether they have implemented the stable link criterion, the control mechanism and or the monitoring of the objective indicators described in the Commission's Common Implementing Rules (CIR), Article 4(4). BEREC also collected information on whether non-EEA destinations were included in the regulated tariffs.

Limits on open data bundles are applied by 69 % of the responding operators. Among the providers that apply a limit on open data bundles, more than half of them (59 %) have implemented a data limit for every tariff plan classified as "open data bundle" while the rest of them (41 %) answered that they have implemented a data limit only to a subset of such tariffs.

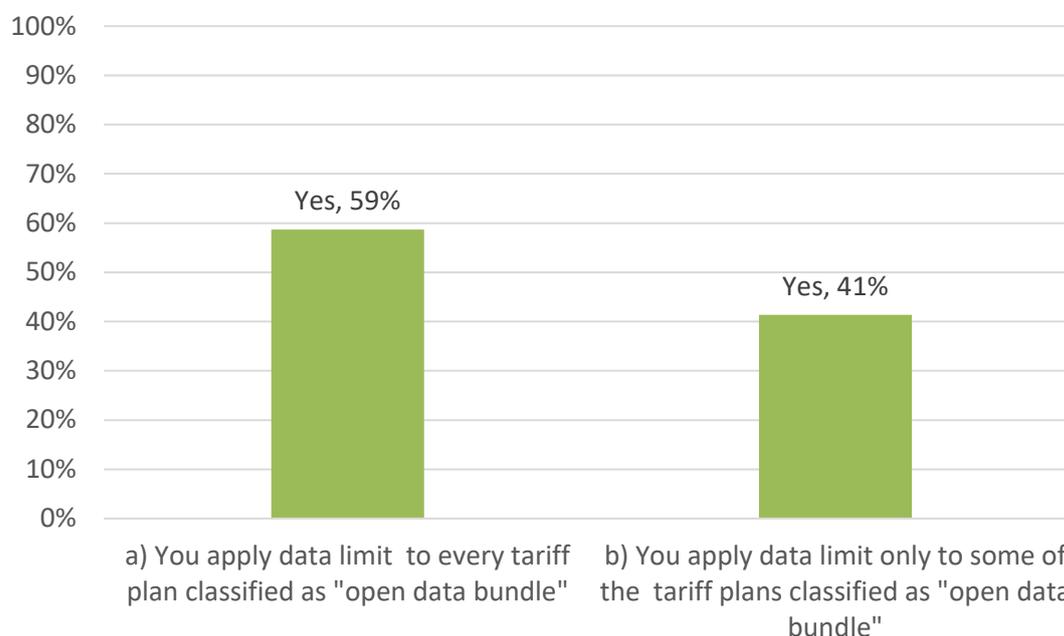


Figure 2: Information on how operators apply an open bundle data limit

So, although more than half of the operators (59 %) apply an open bundle data limit to every open data bundle from those who apply data limits, there are still 31% of respondents who choose not to apply this possibility at all.

As shown in Figure 3, when it comes to the question of applying the stable link criterion, 52% of the responding operators answered that they implemented the stable link criterion.

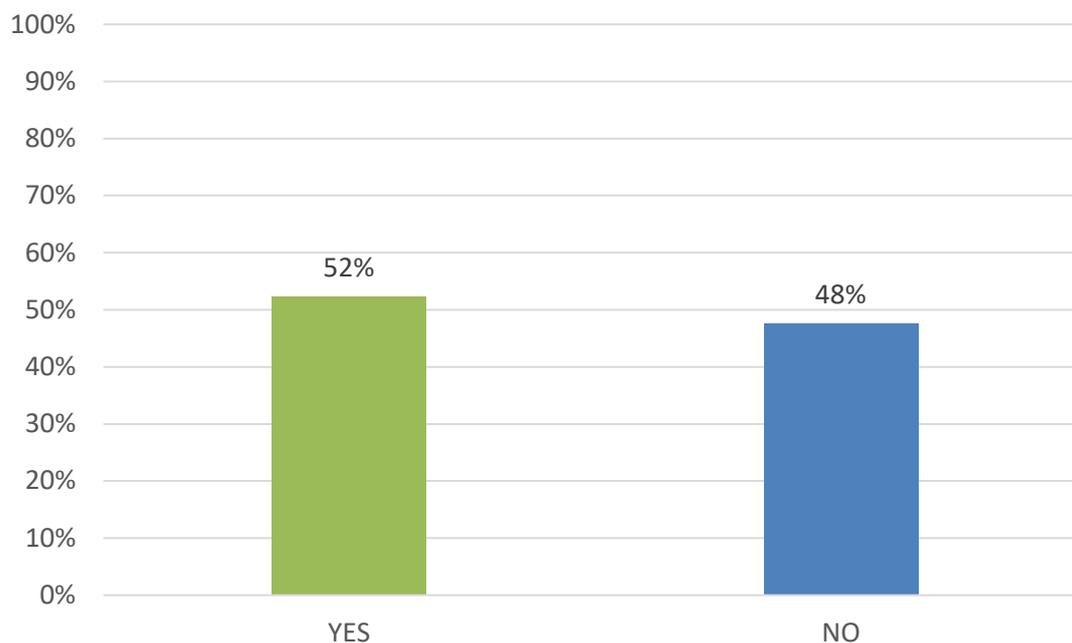


Figure 3: The share of operators that have implemented the stable link criterion

Similarly, the stable link criterion, although applied by a slight majority of operators, is not applied in all cases.

Some operators pointed out that they implemented stable links, but with the focus on post-paid tariffs only. Operators introduced the stable link criterion mainly in the General Terms and Conditions. Furthermore, some operators implemented the stable link criterion in a way that they require a customer to activate and use the SIM card in their home country before it can be used for roaming services. One operator states that it applies the stable link criterion only in a situation when the system has detected an abnormal usage of roaming services.

It should be pointed out that from the operators which implemented the stable link criterion, 59 % apply the stable link criterion to every tariff plan, as shown in Figure 4.

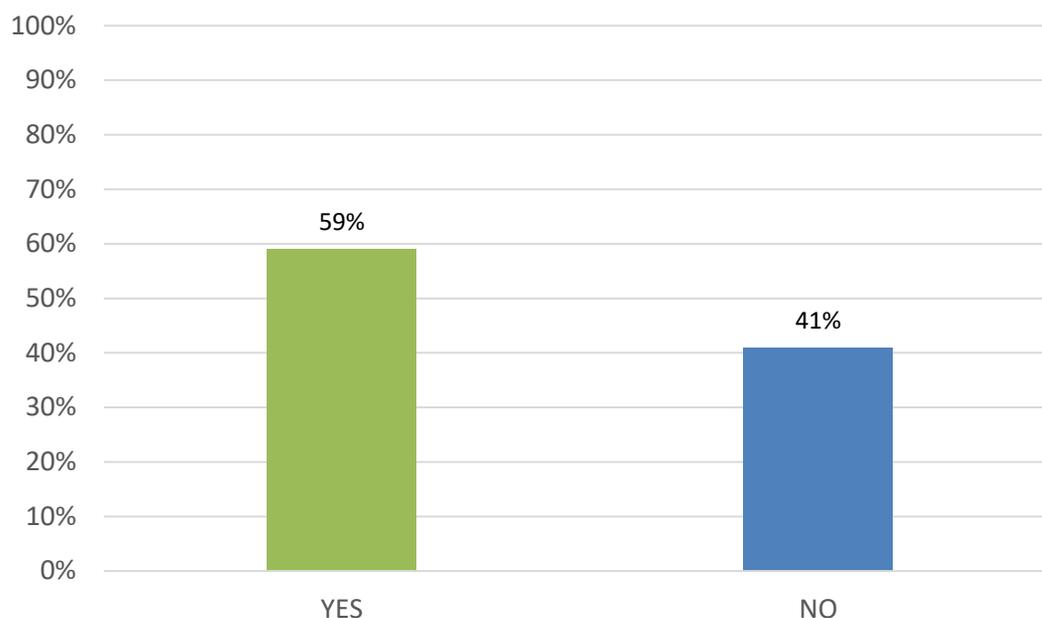


Figure 4: Information on whether the stable link criterion has been applied to every tariff plan

Regarding the implementation of the control mechanism, Figure 5 shows that 58 % of operators have implemented the control mechanism for roaming volumes and presence abroad in the EEA.

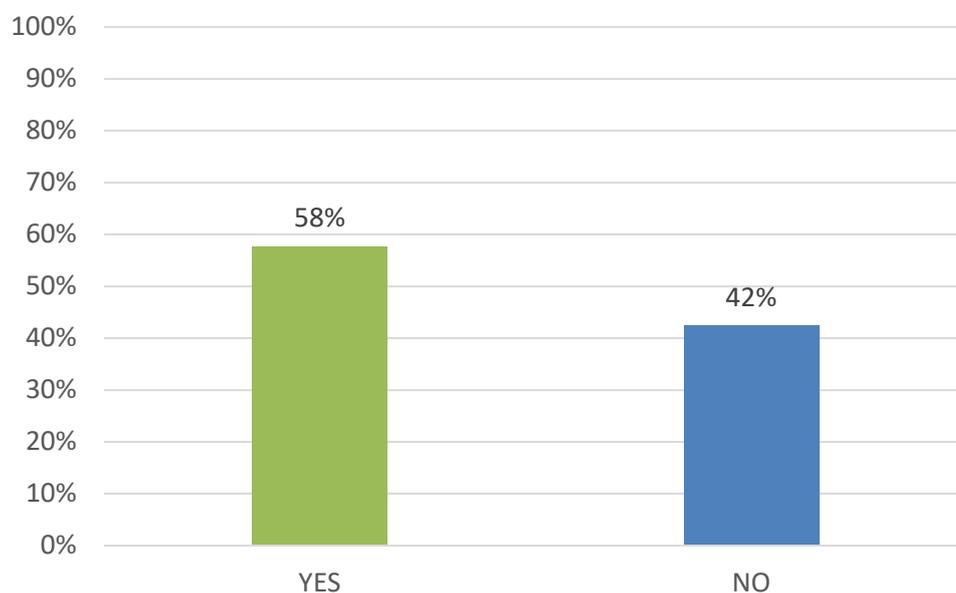


Figure 5: Share of operators that have implemented the control mechanism

Some operators stated that they implemented the control mechanism for roaming volume and presence abroad in the EEA as a part of the General Terms and Conditions as a safeguard measure in case of abuse. Others use it as a regular fraud monitoring mechanism.

Several reasons for not implementing the control mechanism for roaming volume and presence abroad in the EEA were stated. In 26 % of cases it was reported that it was a burdensome and costly mechanism and some chose rather not to implement it and accept the risk of possible abuse, i.e. they probably assume that abuse would be negligible compared to the costs and effort of implementing the control mechanism. Also, some operators will implement the control mechanism for roaming volume and presence later this year.

As shown in Figure 6, 74 % of the operators which implemented the control mechanism apply the control mechanism to every tariff plan.

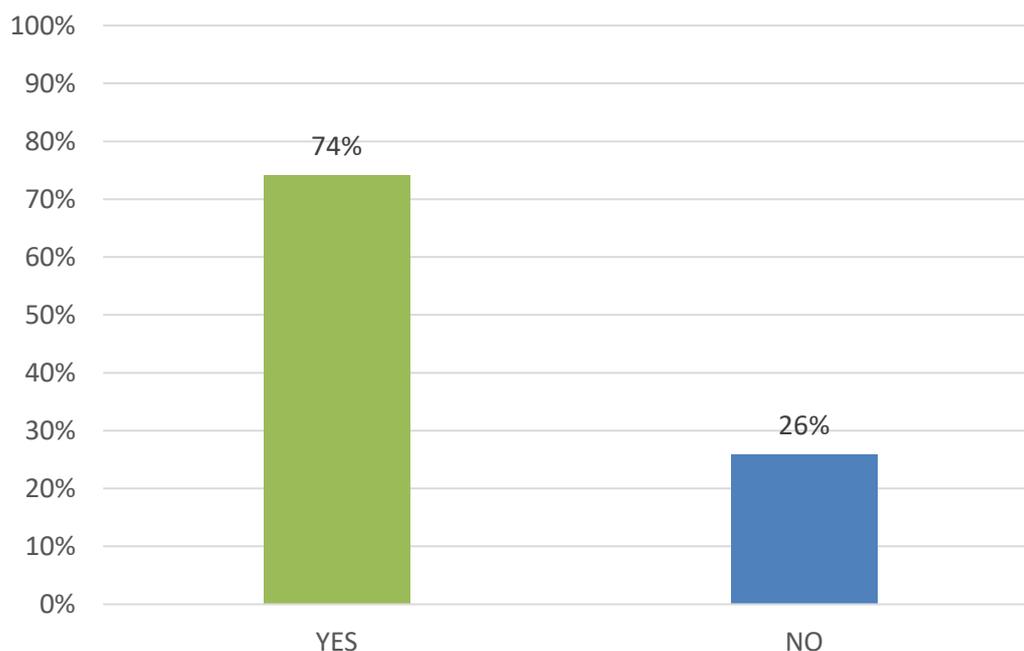


Figure 6: Information on whether operators applied the control mechanism to every tariff plan

From those operators who implemented the control mechanism, 38 % implemented it via a daily observation resolution, 2 % via a weekly observation window, 45 % via a monthly observation window and 15 % via some other period (Figure 7).

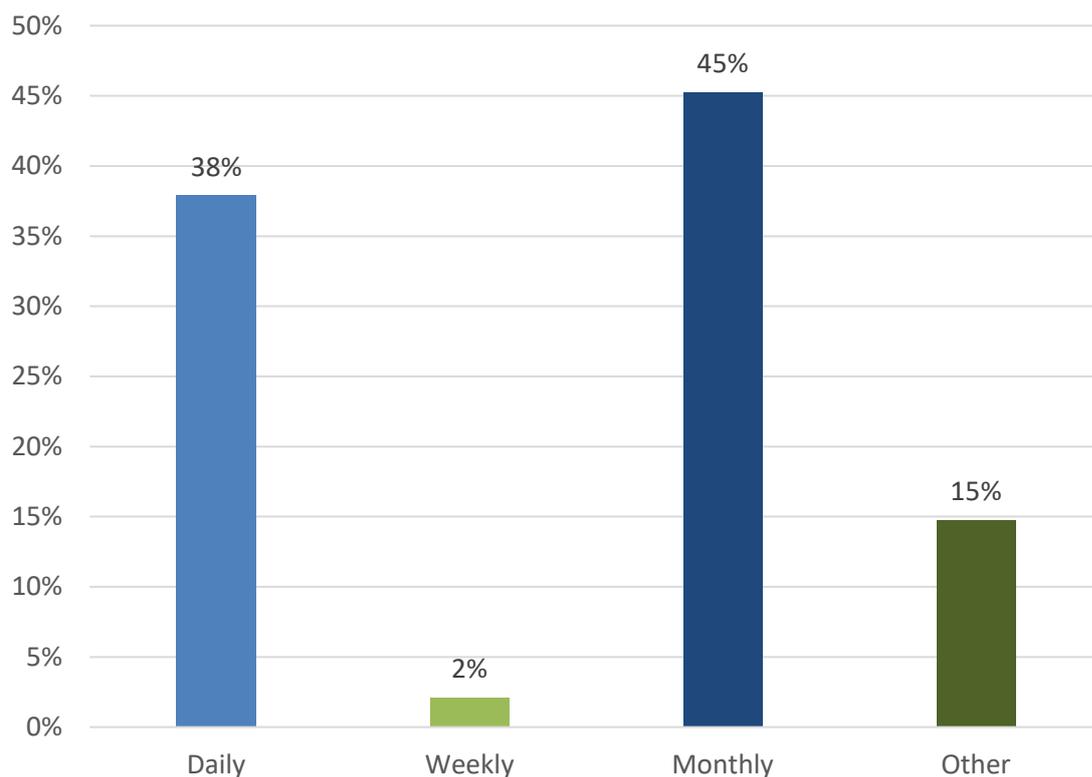


Figure 7: Control mechanism – observation resolution

As seen in Figure 8, the large majority of the respondents that monitor roaming usage and presence abroad in the EEA do this for all services. Only 6 % of them monitor data-only services.

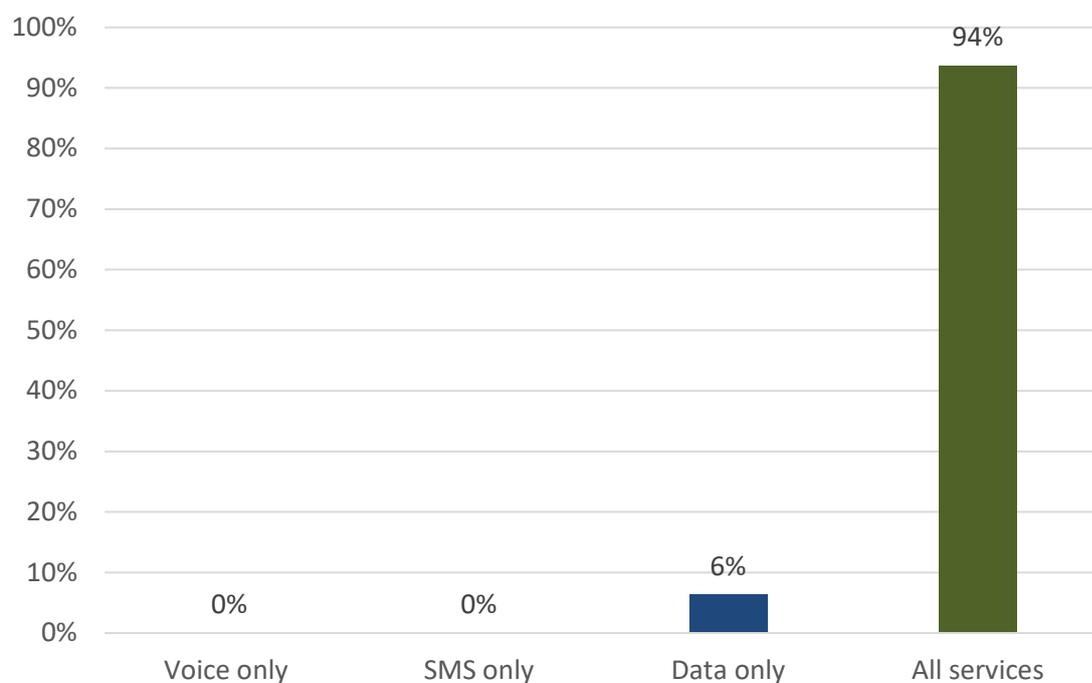


Figure 8: The services observed under a control mechanism

When it comes to the implementation of control mechanisms for other objective indicators, 41 % of the responding operators have implemented such (e.g. long inactivity, sequential use of multiple SIM cards), as can be seen in Figure 9.

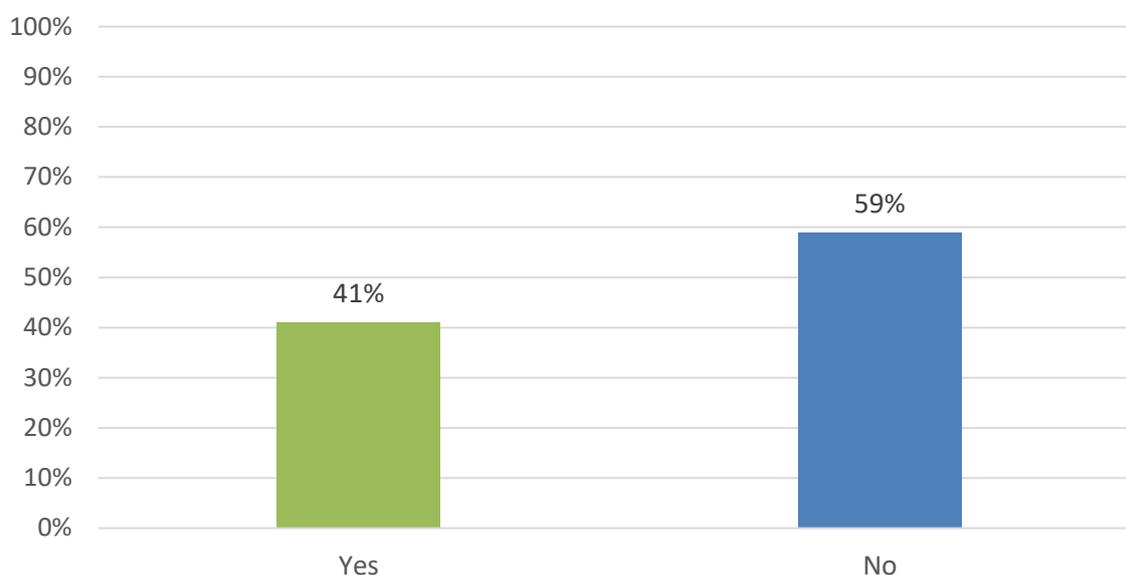


Figure 9: Information on whether operators implemented other control mechanisms for objective indicators

As shown in Figure 10, 49 % of the responding operators include non-EEA destinations in some of their offers.

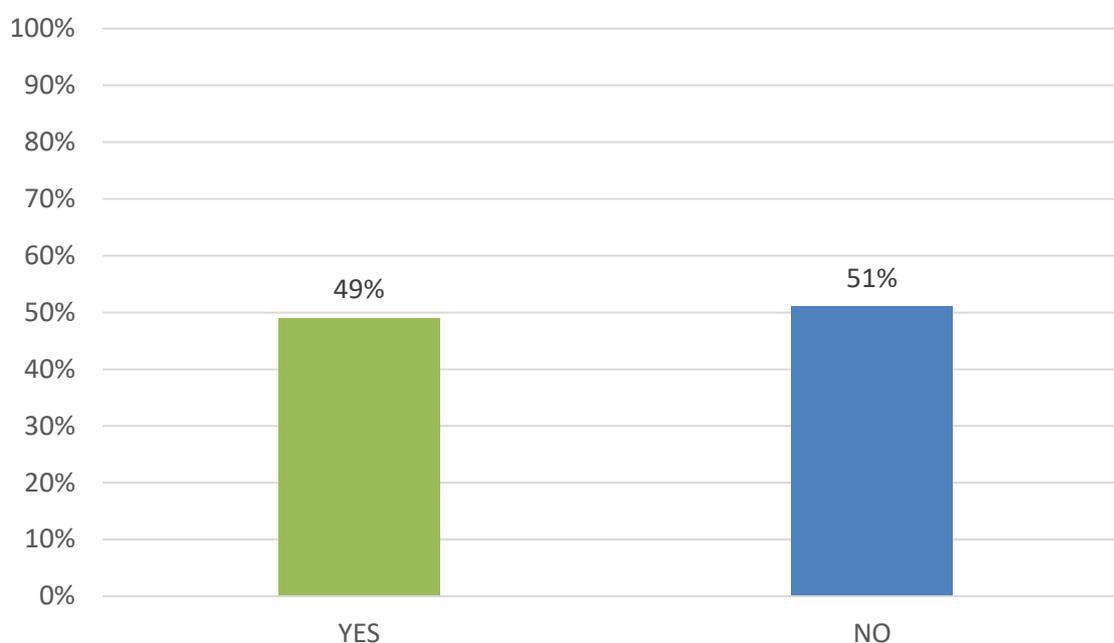


Figure 10: Information on whether operators include non-EEA destinations in some of their offers

3.2. Structure of alternative roaming tariffs pursuant to Article 6e(3)

Pursuant to Article 6e(3) Roaming Regulation, roaming providers may offer, and roaming customers may deliberately choose, a roaming tariff other than the one set pursuant to Articles 6a, 6b, 6c and Art 6e(3) paragraph 1, by virtue of which roaming customers benefit from a different tariff for regulated roaming services other than the one they would have been given in the absence of such a choice.

BEREC has collected information on the type of packages offered as alternative roaming tariff (whether they are daily, weekly, monthly or other tariffs).

Of all responding operators which offer alternative roaming tariffs, 20 % of operators offer such tariff in the form of daily packages, 13 % in the form of weekly packages, 35 % in the form of monthly packages and 28 % in some other form. In addition, 40 % operators include non-EEA destinations in alternative roaming tariffs.

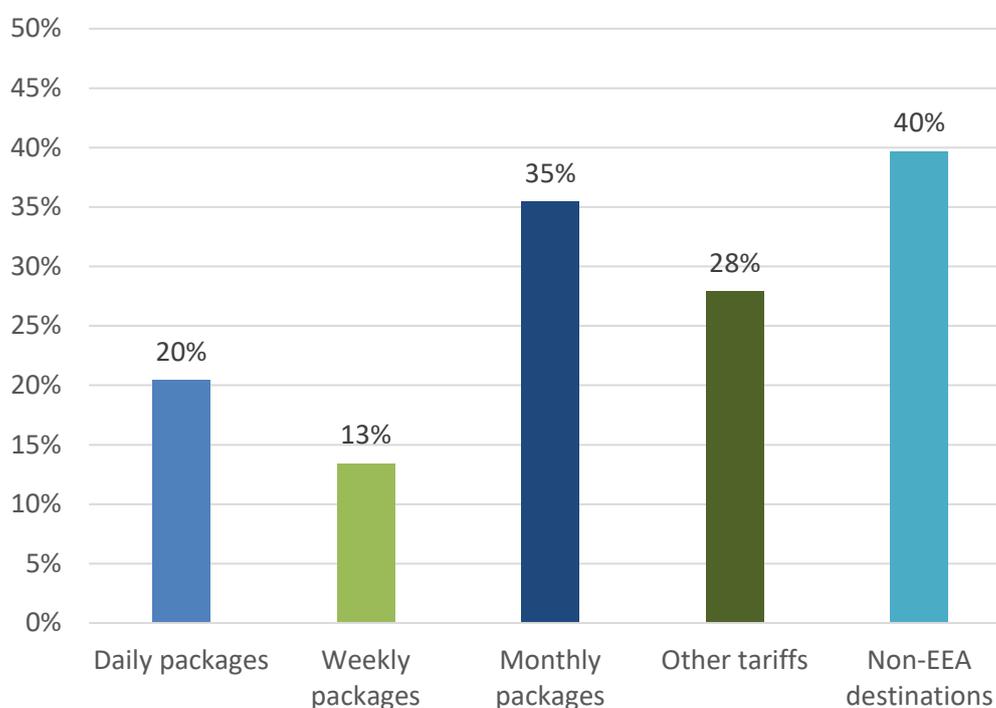


Figure 11: Information on the structure of alternative roaming tariffs

3.3. Tariffs without roaming

In this section BEREC has collected information on tariffs without any roaming option as well as on tariffs from which roaming was withdrawn.

As far as tariffs without a roaming option are concerned, 47 % of the responding operators offer such tariffs.

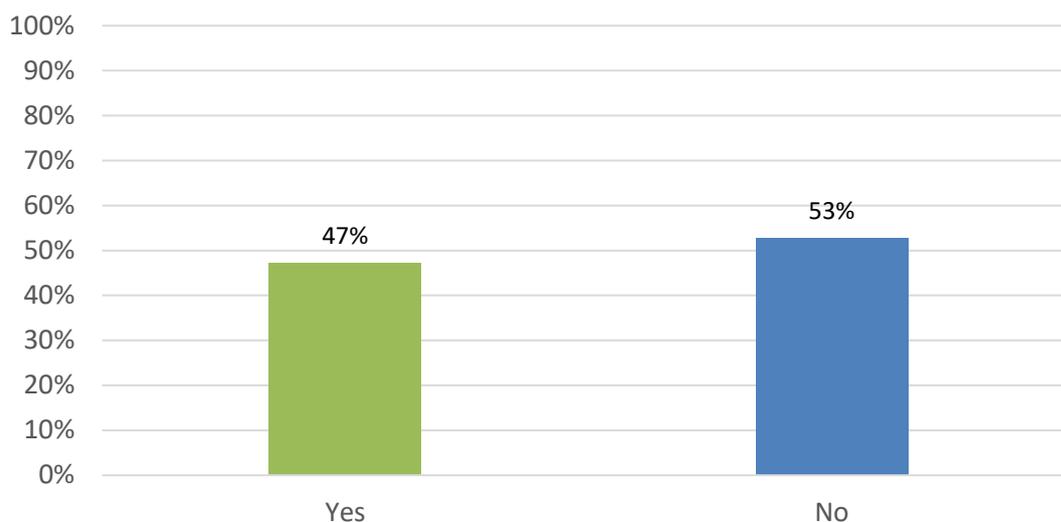


Figure 12: Information on whether operators offer tariffs without roaming

According to the respondents, 27 % withdrew roaming services from their tariffs.

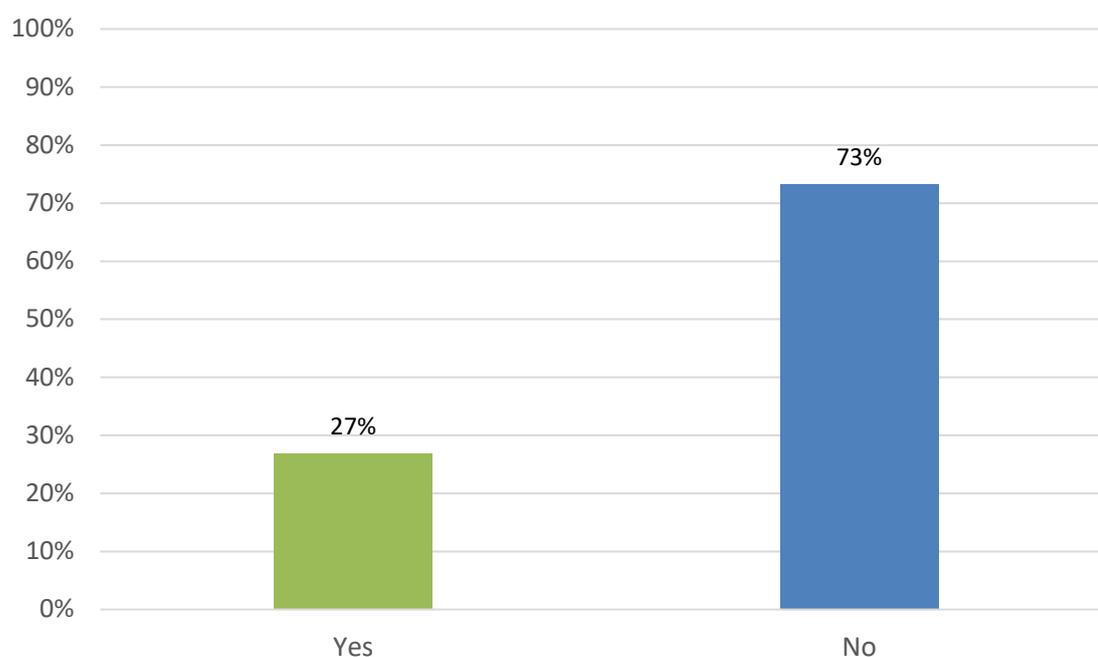


Figure 13: Information on whether there are any tariff plans from which roaming was withdrawn

One operator stated that roaming was withdrawn from dedicated data plans and prepaid cards. Another operator pointed out that the reason for withdrawing roaming services from a tariff was that the rate being paid locally for the data was too cheap to offer any data while the customer roams within the EEA.

4. Transparency of roaming services

4.1. Complaints on transparency issues received by NRAs

76 % of the responding NRAs received complaints on transparency issues since July 2016. This is an increase compared to the previous period, where 58 % of the responding NRAs reported having received complaints. Five NRAs received more than 100 complaints each; most other NRAs have received less than 50 complaints during the same period. However, this might not give a correct picture of the total number of complaints regarding transparency issues. In some countries, complaints from consumers might be handled by other bodies than the NRA or, as some NRA reported, the system which is used to register complaints (in general) makes it difficult to assess the precise amount of complaints on transparency and comparability complaints for roaming.

The figure below shows how many NRAs have received complaints³ on each of the defined categories of transparency issues. There might be other issues that are not covered by these predefined categories. Also note that an NRA might have received more than one complaint in each of the categories.



Figure 14: Categories of complaints received on transparency issues from July 2016

43 % of the NRAs have received complaints from customers not knowing that international calls (calls from their home country to another EEA country) are not covered by the Regulation. However, the number of complaints received by each NRA is relatively low, i.e. less than 10 in the previous year.

³ The observation period lasts from July 2016 to July 2017. However, some issues that caused complaints were only applicable from 15 June 2017 (eg. RLAH tariff not automatically applied).

The responses from NRAs also show that alternative tariffs have resulted in many complaints from customers. 43 % of the NRAs have received such complaints. One NRA received between 50 and 100 complaints from customers not knowing that they were on an alternative tariff.

Likewise, the prices for roaming on ships and planes are still an issue that causes complaints from customers. This is because they are not aware that the Regulation does not apply in these cases. However, the number of complaints received by each NRA is relatively low, i.e. less than 10.

Many NRAs have received complaints from customers because they were no longer able to use their subscription while roaming. As there is no obligation on providers to offer roaming services, some of them changed their subscriptions at the introduction of RLAH to be domestic only. This resulted in complaints from customers in many countries, because the customers were not aware that their tariff was no longer roaming enabled. A single NRA received between 50 and 100 complaints on this issue.

Other categories of complaints regard the lack of the activation of cut-off limits for data services while roaming, that RLAH was not implemented automatically, billing problems while roaming and missing information to end-users on charges applying outside EEA. Six NRAs have received complaints from customers that did not receive the welcome SMS. A few NRAs have received complaints from customers regarding a lack of information about the price for on-net calls while roaming, the price for free numbers while roaming and the charges for calling premium-rate services while roaming.

BEREC also asked NRAs if they had received complaints from end-users on issues related to the FUP after 15 June 2017. This could be either restriction levied on the roaming data volumes or on the control mechanisms for permanent roaming. Since the period for registering complaints on this issue was rather short, from 15 June to 31 July, the data available for this topic is very limited (as well as for complaints on the non-automatic application of RLAH tariff). However, eight NRAs have received complaints on issues related to the FUP during this period. These complaints were mainly due to customers not being clearly informed of the FUP that was applied. The figure below shows how many NRAs have received complaints on each of the defined categories of complaints related to FUP.

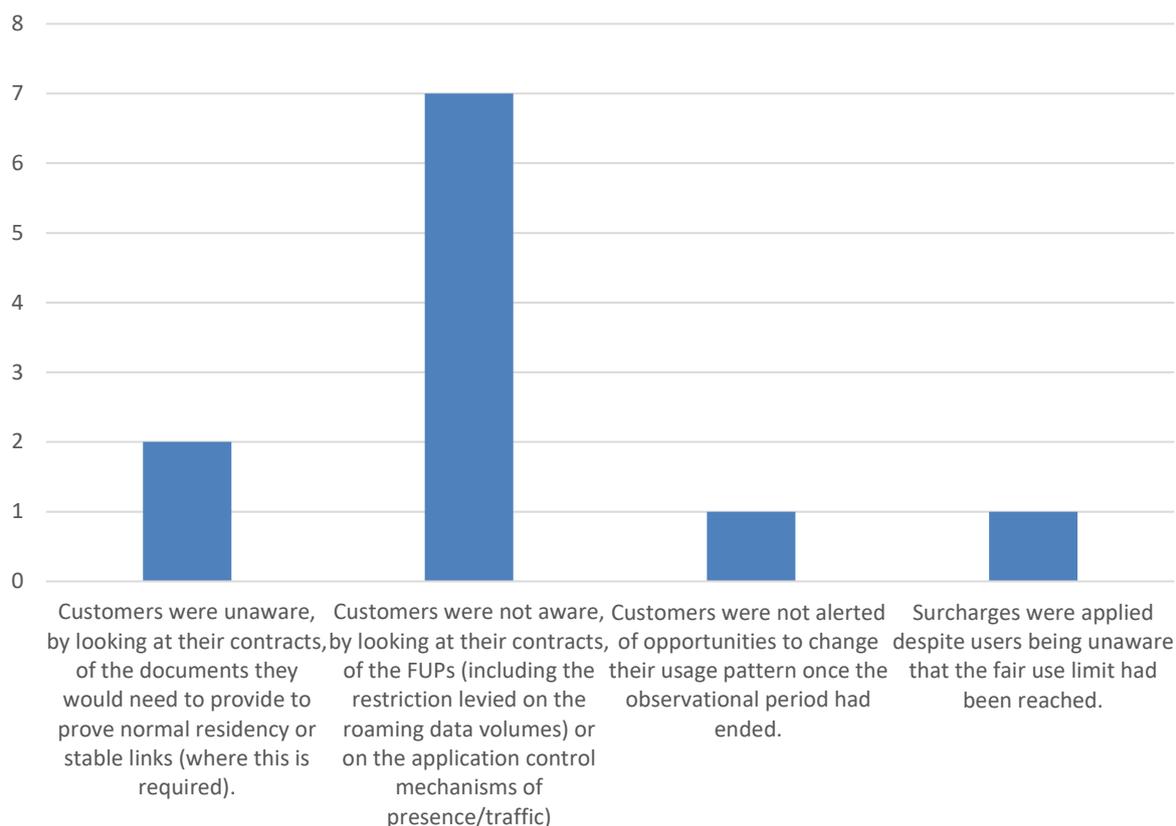


Figure 15: Number of NRAs that have received complaints on FUP

The number of complaints received on each of the categories were low (less than 10), however one NRA received between 50 and 100 complaints from customers not aware of the FUP that applied to their tariff.

4.2. The extent of sustainability surcharges

The abolition of retail roaming surcharges has made it easier for consumers to understand what they will pay for using mobile services while travelling in the EEA. This stems from the fact that while roaming in the EEA, prices or charging mechanisms shall be the same as in the home country. The implementation of the new roaming regime from 15 June 2017 has, in this sense, increased both the transparency and comparability of mobile tariffs. However, the application of fair use policies and sustainability surcharges could still be an obstacle for increased transparency and comparability of mobile tariffs. Against this background, BEREC has asked for information from NRAs regarding the application of sustainability surcharges.

16 NRAs have received applications for sustainability surcharges. In total 53 applications were received by the end of August 2017. 30 applications were granted by the end of August 2017, 12 were still pending and 11 applications were refused. The figure below shows the share of granted and refused applications in each of the countries that received applications.

Country	applications received	Applications granted	Applications refused	Applications pending
Austria	3	2	1	0
Belgium	2	1	1	0
Czech Republic	3	0	3	0
Denmark	2	1	1	0
Finland	5	4	0	1
France	12	11	1	0
Lithuania	4	4	0	0
Poland	9	0	0	9
Portugal	1	0	1	0
Slovakia	1	0	1	0
Netherlands	1	0	1	0
Estonia	3	3	0	0
Romania	1	1	0	0
Spain	2	0	0	2
Sweden	1	0	1	0
Italy	3	3	0	0

Table 1: Granted and refused applications for sustainability surcharges

36 % of the granted applications applied to MNOs, the same number of applications granted applied to MVNOs and 28 % of the granted applications applied to resellers. The providers are operating in both the residential and business segment. Most of the providers that were granted derogation have a small market share⁴. However, in three countries applications from MNOs with 30 % market share each were granted. In these countries, the market share of the providers that were granted derogation accumulated to between 90 to 100 % of the market. However, plans without surcharges are available in all three countries.

Six NRAs reported that their granted applications are set at the regulated wholesale caps and three NRAs reported that they granted surcharges below the current wholesale caps. None of the NRAs reported surcharges above the wholesale caps. One NRA reported that they have not determined the exact level of surcharge; however, the total sum from the applied surcharges must not exceed the projected negative roaming retail net margin. For half of the countries where derogation was granted, surcharges are applied for all tariffs. In the remaining countries surcharges are applied only to some tariffs or to some services. Some providers apply surcharges only on pre-paid tariff plans and on post-paid tariff plans that are no longer in sale, while current post-paid tariff plans launched after 15 June are without surcharges. One provider applies surcharges only on the tariffs that were not enabled for roaming before the surcharges were granted, for these tariffs roaming is charged as "pay-as-you-go".

⁴ In France, two out of eleven applications granted belong to MVNOs with an accumulated market share of 2.5 % while the rest of them belongs to resellers with an accumulated market share under 0.1 %.

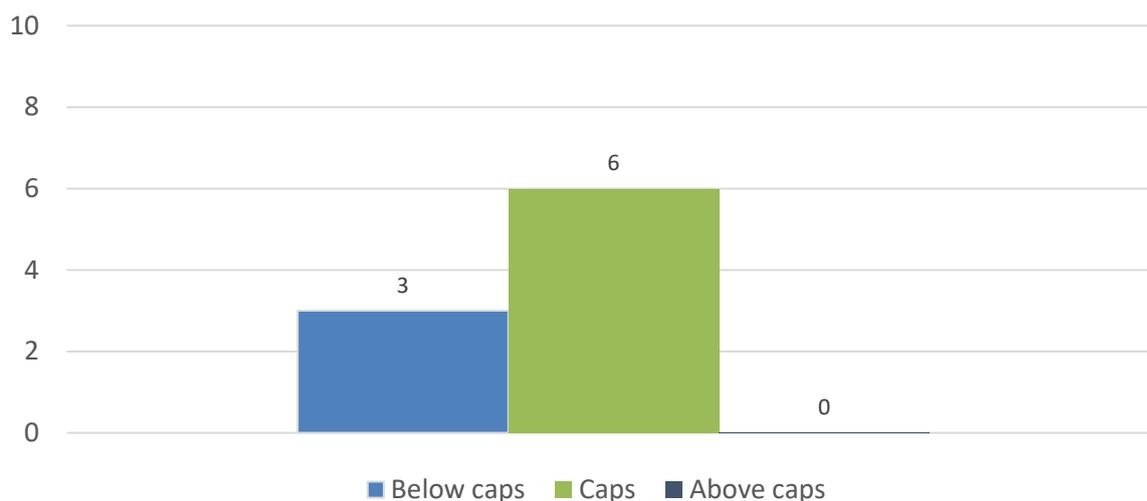


Figure 17: The level for sustainability surcharges

4.3. Information about RLAH in Welcome SMS

According to Article 15 of the Roaming Regulation operators are still obliged to send an automatic message to their customers while roaming, providing basic personalized information for the roaming customer. Although under the RLAH principle the domestic retail price is applied, while roaming in the EEA this provision is still valid. As Figure 18 shows, about 94% of the operators therefore inform their customers via Welcome SMS that the domestic tariff is applied while roaming.

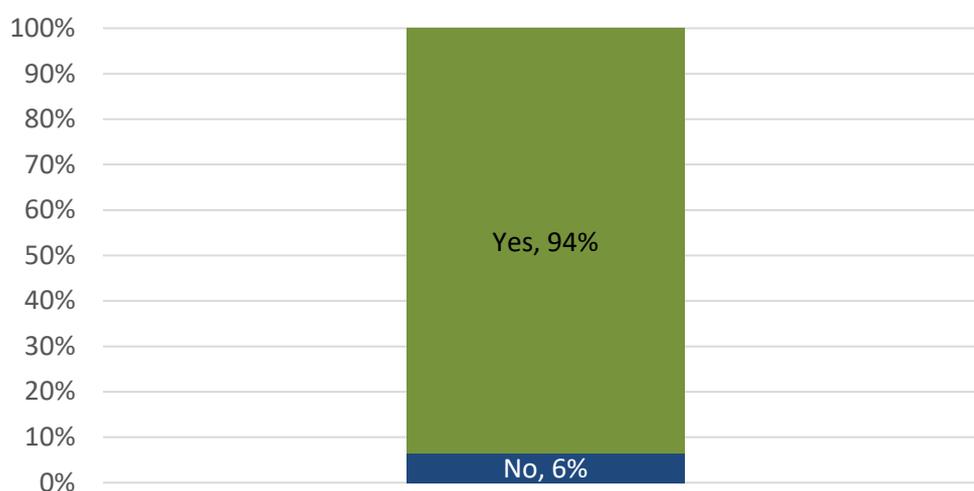


Figure 18: "Welcome SMS" informing about the application of the domestic tariff

4.4. Information about alternative tariffs

Also under the rules of RLAH according to Article 6e of the Regulation, roaming providers are allowed to offer alternative tariffs. Such alternative tariffs are characterized by the deviation from roaming tariffs according to Articles 6a, 6b and 6c. Typically such tariffs include other countries than the EU Member States (e.g. Switzerland), include a different data roaming allowance, per diem or monthly packages as it has been pointed out in Figure 11. Customers shall deliberately choose such tariffs, which require knowledge about the existence of the regulated tariff and the nature of the roaming advantages which would thereby be lost. In addition customers shall be able to switch back, any switch shall be free of charge and shall not entail conditions or restrictions pertaining to elements of the subscriptions other than roaming. Therefore roaming providers shall inform their customers in a transparent way to make a conscious choice. According to Figure 19 the three main types to inform customers about the regulated tariff are directly at point of sales (93 %) followed by call centre (87 %) and website (83 %). In addition, roaming providers provide information about the regulated tariff by mobile terminal (59 %), via a personalized webpage (42 %) and via the customer's bill (42 %).

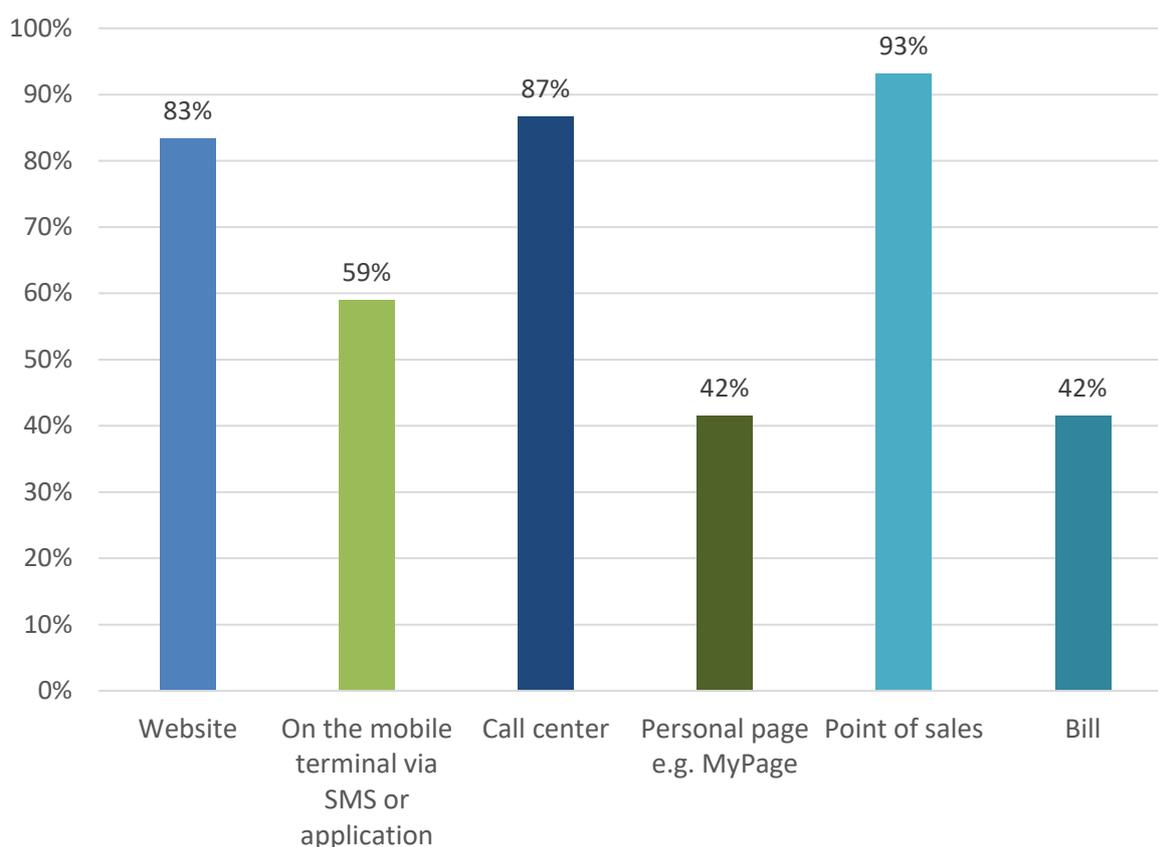


Figure 19: Information about regulated tariffs

4.5. Information about switching between tariffs

Regarding the possibility to switch between tariffs, as seen in the previous figure, there are three main ways to provide such information (Figure 20).

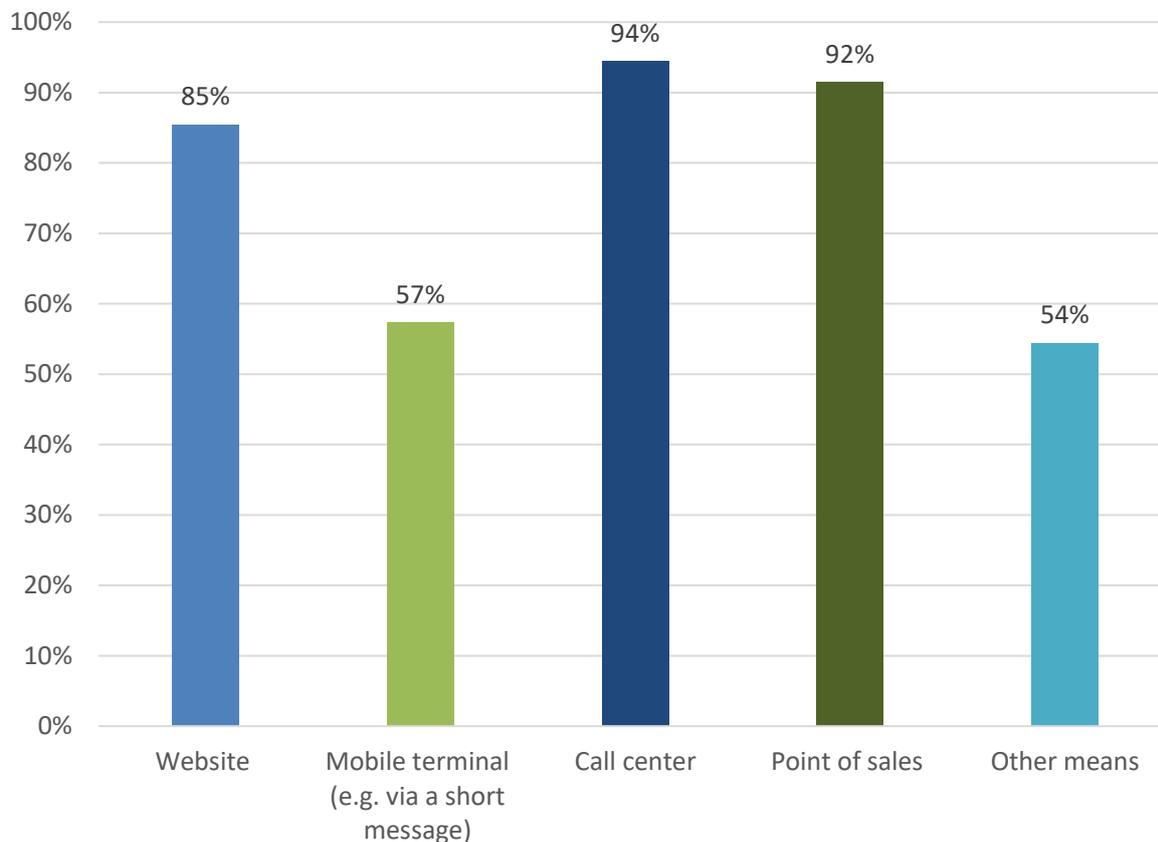


Figure 20: Information about switching between tariffs

Most of the roaming providers inform their customers by means of call centres (94 %), at the point of sales (92 %) and their website (85 %). There is also information available by other methods (54 %). These include, for example, so called MyPage services, landing pages, IVR⁵, brochures, invoices, information via emails via mobile applications or mobile terminals.

The majority (about 90 %) of roaming providers offering alternative tariffs stated that they did not apply any activation charge when their customers switch between any of their tariffs.

For alternative tariffs limited in time, 80 % of the respondents inform their customers actively about the charges that are applied for roaming services when the time period for the chosen alternative tariff ends. This still means that 20 % of the roaming providers do not actively inform their customers about the charges applied after the end of the alternative tariff period.

When customers have contracted an alternative tariff bundle with roaming services that includes a limited number of minutes, SMS and/or limited amount of data services, 88 % of

⁵ Interactive Voice Response

the operators inform their customers via SMS, website etc. about the charges that apply for out-of-bundle consumption. Furthermore roaming providers inform customers with alternative tariffs about agreed limits within their contracts. 89 % of the operators notify their customers when they reach the limit of the bundle, while 82 % of the respondents said that they also provided additional information for their customers in case a certain percentage of the bundle is used. This means that there are still some operators that do not inform their customers when they reach the limit included in the bundle. This may have a negative impact for customers as this could lead to additional charges (e.g. bill shocks) as a result of customers not having been thoroughly informed of such out-of-bundle charges in advance.

4.6. Methods for providing information about consumption

This section addresses the methods used by providers to inform their customers about historical and real-time consumption of international roaming services. The questionnaire provides some examples of methods commonly used by providers for providing information about consumption such as the providers' websites, interaction with the mobile device of the customer, call centres, applications or any other means specified by the provider.

Aside from bills, providers reported using different methods to provide information on consumption and charges, ranging from the customers' area of the website, call centre, interaction via the terminal using short codes, to specific applications for smartphones and tablets. The majority of the operators (86 %) who responded to the questionnaire said that they enabled their customers to use different methods to access this information.

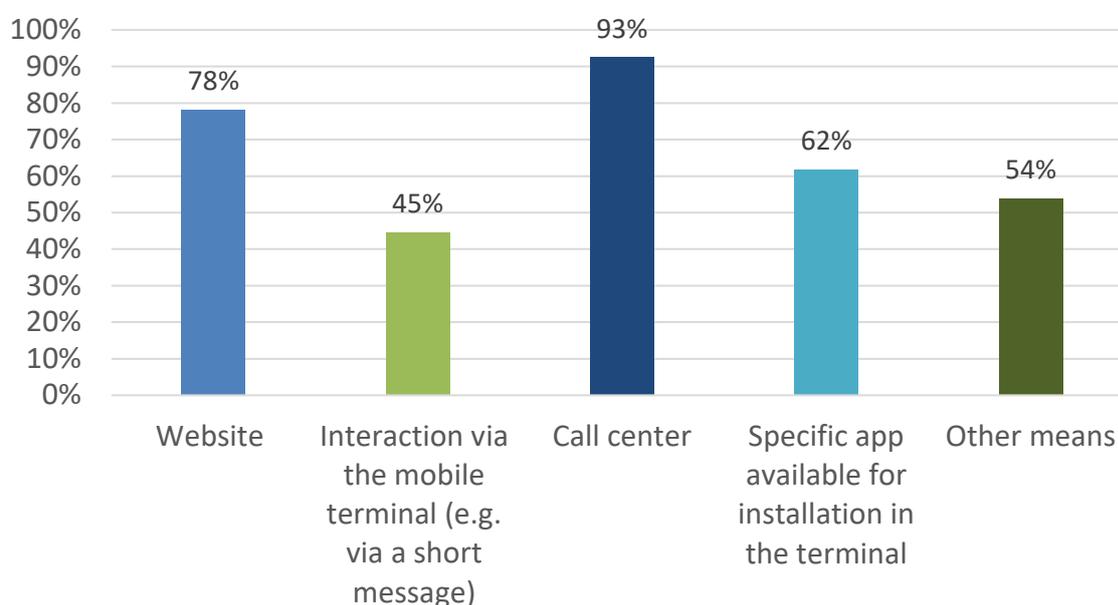


Figure 21: How providers inform customer of charges and/or volume consumption (historical)

The results of the questionnaire show that almost all providers who responded to the questionnaire make historical service records available to their customers (Figure 21). The most used communication channel for delivering historical information to customers is via call centre agents (93 %), followed by the customer area on the providers' website (78 %), via a

specific application for installation in the terminal (62 %), any other means (54 %) or interaction via the mobile terminal using short codes (45 %)

As shown in the following Figure 22, similar methods are also used to provide customers with information on real-time consumption.

For reasons of clarity, “real-time” information in this report also includes information provided in “near” real-time. “Near” real-time means that certain information on roaming consumption is not available yet, since some of the providers receive data from their roaming partners within a 24-to-48-hour time lag.

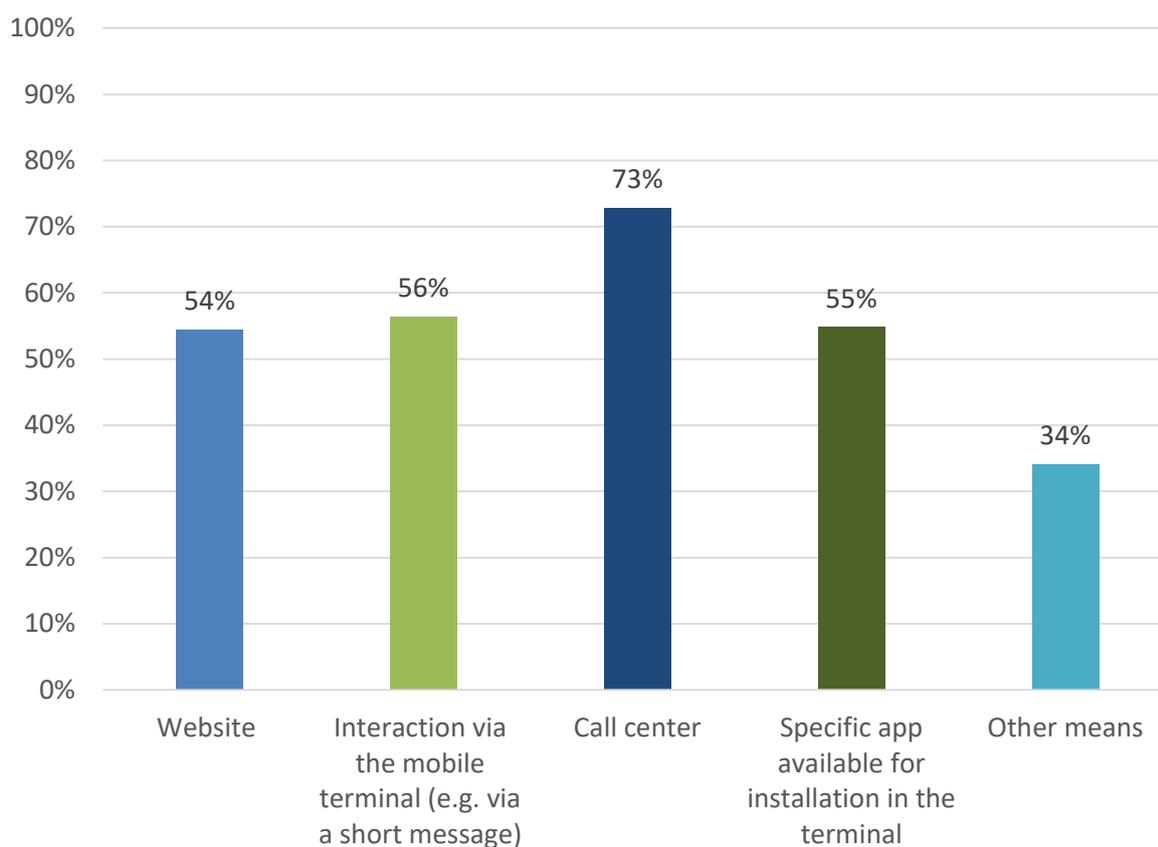


Figure 22: How providers inform about the charges and/or volume consumption (real-time information)

The most popular way for providers to supply data on real-time consumption is via call centre agents (73 %). The second most popular way is by interaction via the mobile terminal (56 %) closely followed by the use of a specific app installed in the terminal (55 %) and by publishing information in customer areas on the providers’ websites (54 %). Also 34 % of the respondents mentioned that they provided such data by other means.

Certain methods require some action by the customer such as dialling a short code or sending a keyword to a short code, and upon doing so they receive an SMS giving their call credit and data usage balance.

Especially-designed applications available on smartphones or tablets are still getting more and more popular compared to previous years. Applications for accessing historical and real-time information are offered by many providers. 62 % (+10 percentage points compared to 2016 for historical data) of the operators participating in this year's survey stated that, they provide information via apps for historical data and 55 % (+6 percentage points compared to 2016) for real-time data.

The most popular communication channel used by providers to supply historical and real-time information on the consumption is still via call centre agents (+4 percentage points and +9 percentage points, respectively, compared to 2016). The second preferred communication channel is the customer area on a provider's website for historical information and by a specific app installed in the terminal for real-time information. Operators provide more or less the same level of transparency when it comes to supplying information on consumption, on both historical and real-time consumption, compared to the previous year.

4.7. Information on volume consumption and charges

This section examines the provision of separate itemized information relevant to the roaming services, charges and volumes in the monthly bills as well as real-time billing information. The wide adoption of such practices is aimed at ensuring transparency among European providers with regard to roaming charges in order for them to show clearly the amount subscribers pay and what they get in return.

BEREC asked operators whether customers were provided with service records including volumes and charges as well as with real-time billing information. The information collected on charges and volumes was then split into information on outgoing voice calls, incoming voice calls, outgoing SMS and data services.

In general, customers are informed about the applicable roaming charges and the consumed volumes of regulated roaming services, as more than 90 % of the operators provide the necessary service records about their customers in the respective monthly bills, both for service charges (Figure 23) and volumes (Figure 24). Compared to the previous transparency report this means a small reduction of 4 percentage points. It is notable that information on incoming calls decreased remarkably. 80% of the respondents stated that they inform their customers about incoming calls within the EEA. This is a reduction of more than 10 percentage points compared to previous surveys. One reason for the decrease could be, that already in the transitional period of RLAH, operators did not charge possible surcharges for incoming roaming calls.

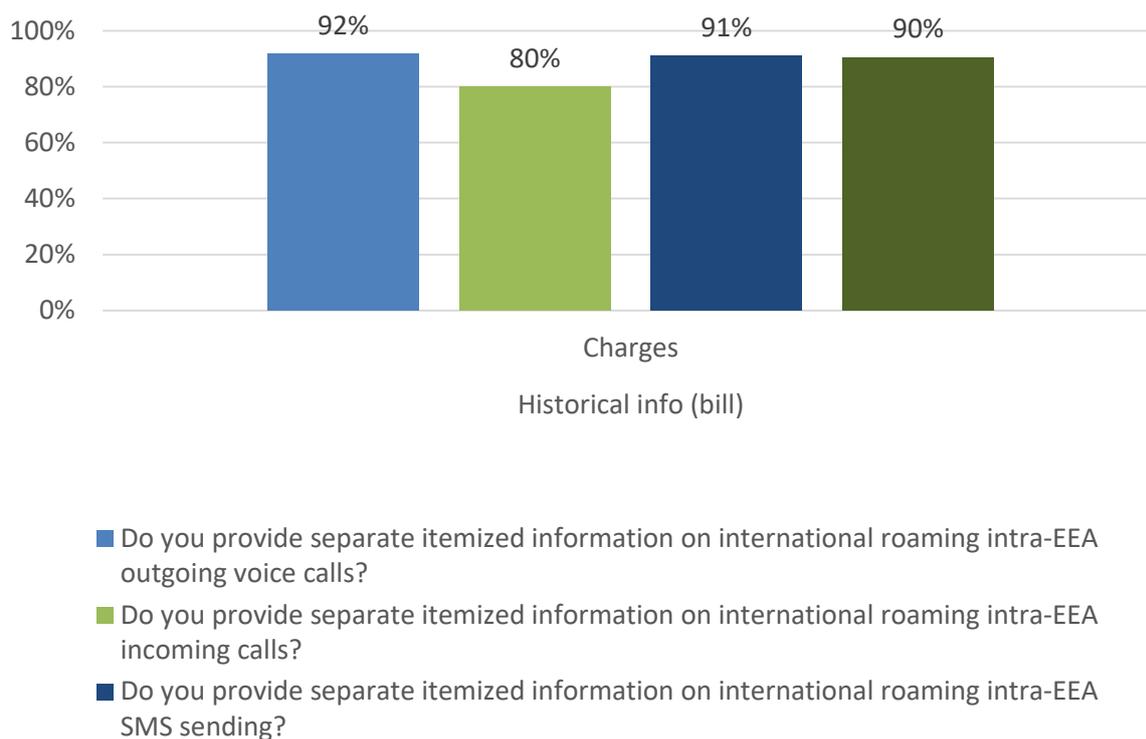


Figure 23: Information for customers about charges for intra-EEA roaming (historical billing information)

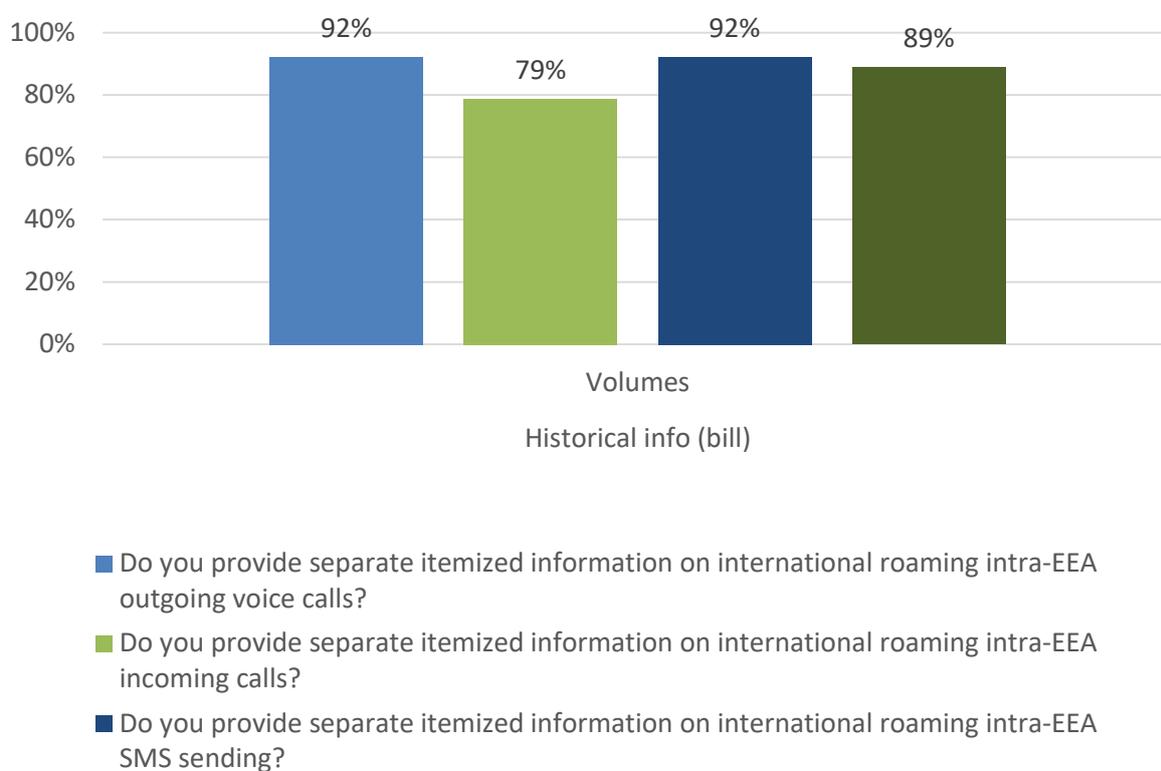


Figure 24: Information for customers about the consumption of intra-EEA roaming (historical billing information)

Less than half of the operators surveyed reported providing itemized charges in real time for voice calls (outgoing 47 % and incoming 36 %,) and SMS (48 %). Besides, 66 % of the questioned operators stated that they provide real-time information concerning charges for data services. It is worth noting that with regard to data services this means an increase of 16 percentage points compared to the previous data collection exercise, while providing information for voice and SMS is declining.

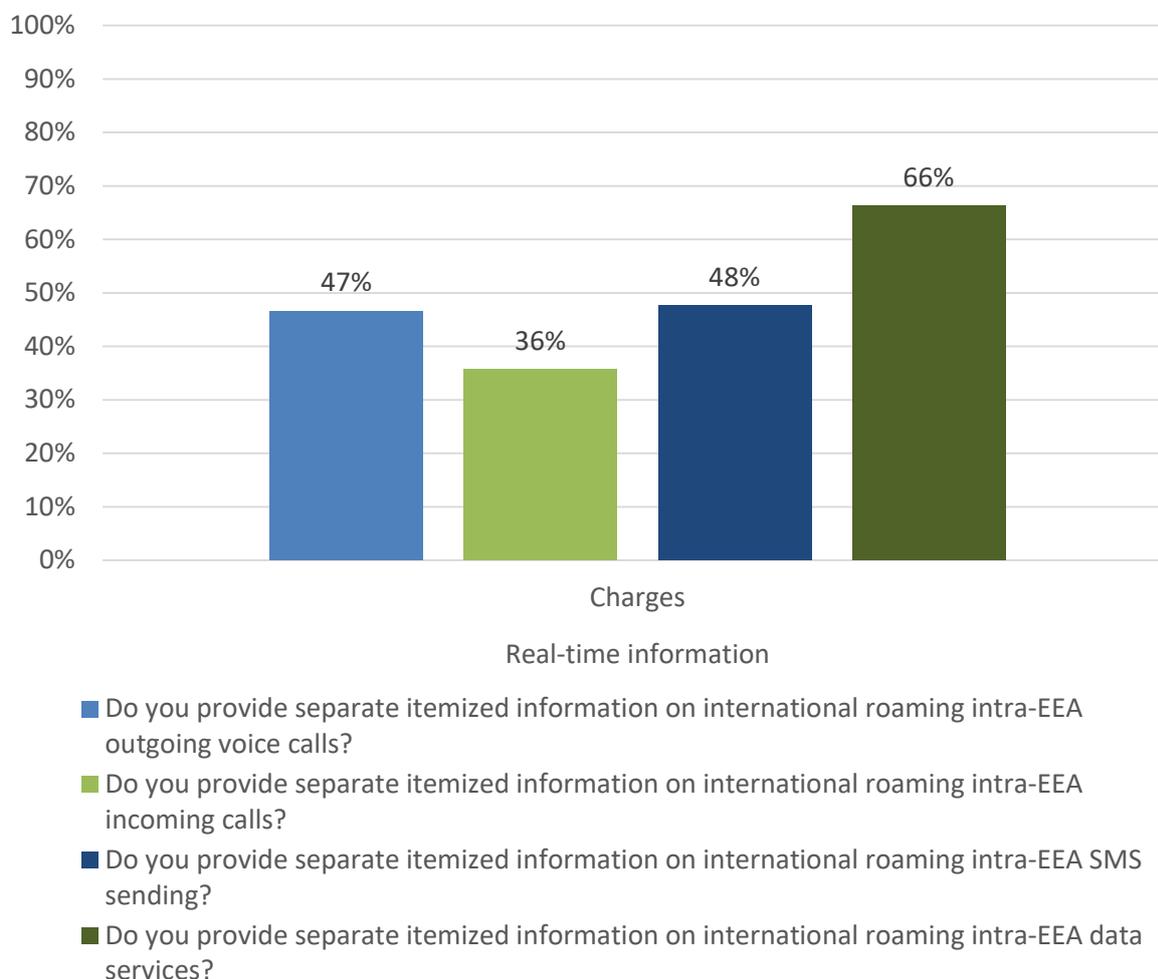
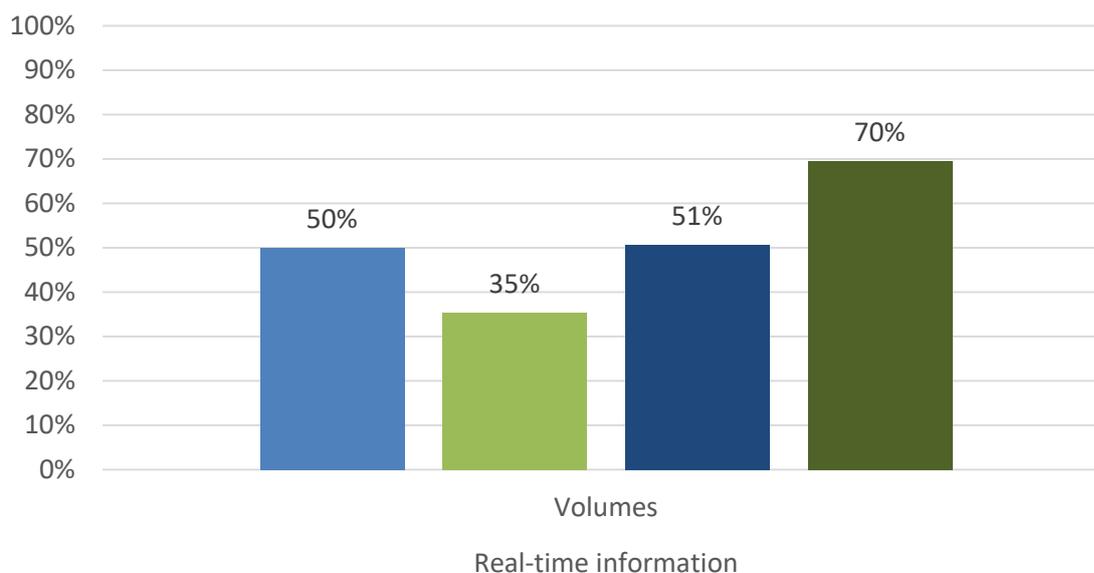


Figure 25: Information for customers about charges for intra-EU roaming (real-time information)

In view of providing itemized volumes in real time a similar picture appears. Less than 50 % of the operators reported providing such data for voice calls (outgoing 50 %, incoming 35 %) and SMS (51 %). 70 % of the operators reported offering their customers the opportunity to obtain information about their consumed volume (Figure 26).



- Do you provide separate itemized information on international roaming intra-EEA outgoing voice calls?
- Do you provide separate itemized information on international roaming intra-EEA incoming calls?
- Do you provide separate itemized information on international roaming intra-EEA SMS sending?
- Do you provide separate itemized information on international roaming intra-EEA data services?

Figure 26: Information for customers about the consumption of intra-EU roaming (real-time information)

Operators inform their customers in different ways about their consumption and subsequent charges. Figure 27 illustrates the main sources of information. With regard to historical billing information, operators mainly provide information by call centres (93 %) followed by websites (78 %). Other ways to inform customers about charges and/or volumes are mobile apps (62%), by any other means (54 %) or directly via mobile terminals (45 %).

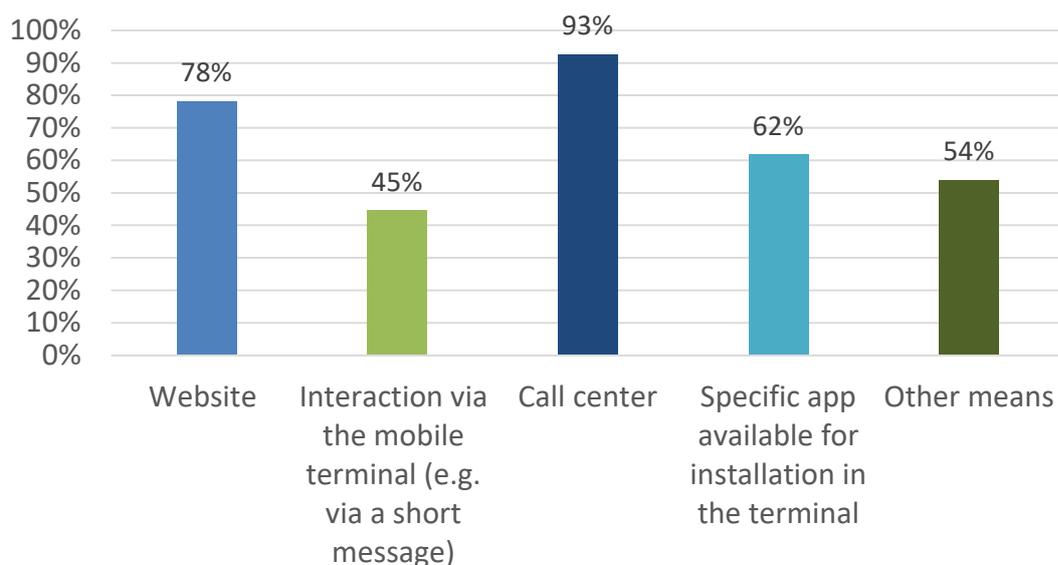


Figure 27: How providers inform customers of their charges and/or volume consumption (historical)

As Figure 28 shows, the usage of information source providing real-time information is different. Call centres (73 %) are the most common option followed by interaction via mobile devices (56 %), a special app on the mobile device (55%) and websites (54 %).

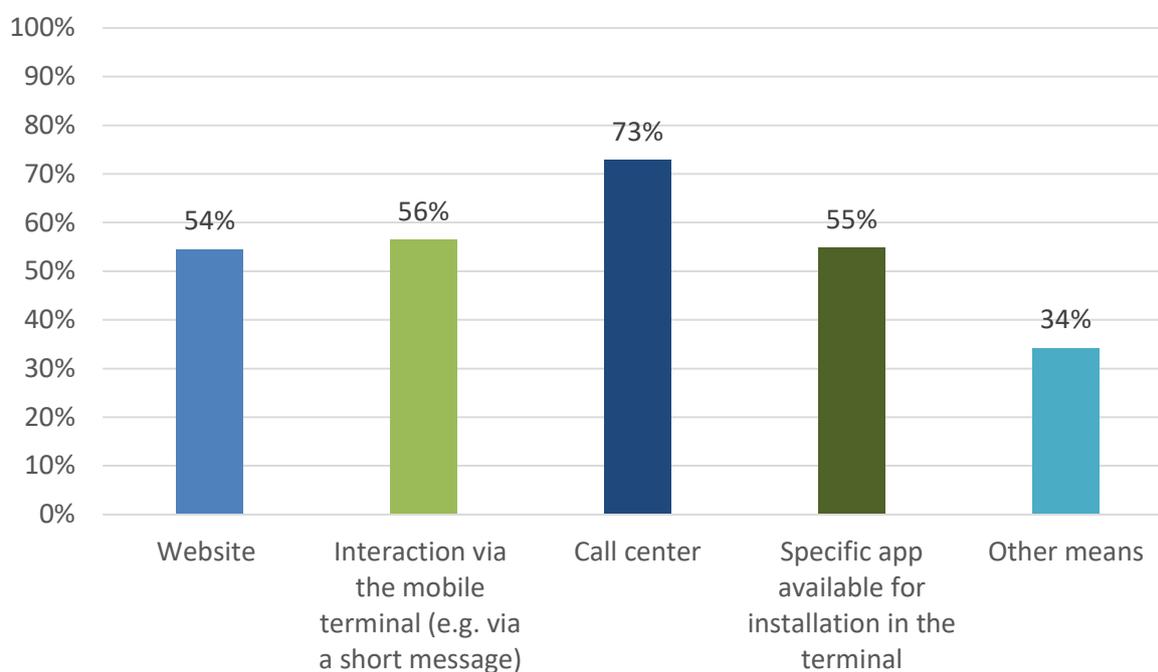


Figure 28: How providers inform about the charges and/or volume consumption (real-time information)

BEREC notes that there is a variety of ways to provide information about charges or volumes for roaming services (voice calls, SMS and data services) to the customer. Some operators only deliver information on volumes, others only on prices. In some cases, operators provide both price and traffic information on all three services, but in other cases the records are restricted to one or two roaming services only. Overall, there is no significant difference between providing real-time information on prices and volumes regarding the type of service considered. Lastly, it should be noted that the available information for end-users about charges and consumption with regard to international roaming data services has increased especially with view to making such information visible due to smartphone apps supplied by the roaming-providers, this way to provide information has increased by 6 percentage points compared to 2016.

4.8. Providing information within the fair use policy

According to the Commissions Implementing Regulation (CIR) Article 4 roaming providers are allowed to implement a fair use policy. Especially for those kinds of fair use policies which depend directly on the consumption of regulated roaming services, providing transparent information is necessary.

4.8.1. Open data bundles

According to the Roaming Regulation, open data bundles are tariff plans for the provision of one or more mobile retail services which do not limit the volume of mobile data retail services or for which the domestic unit price of mobile retail data services is lower than the regulated maximum wholesale roaming charge. Operators are allowed to limit roaming data consumption at domestic prices for those open data bundles. After exceeding the fair use roaming allowance, roaming providers are allowed to charge a surcharge for the additional use of the data service. The Regulation states that information about the overall and actual data volume used is accessible for customers to know how much roaming volume allowance is left before a surcharge could be applied by the roaming provider.

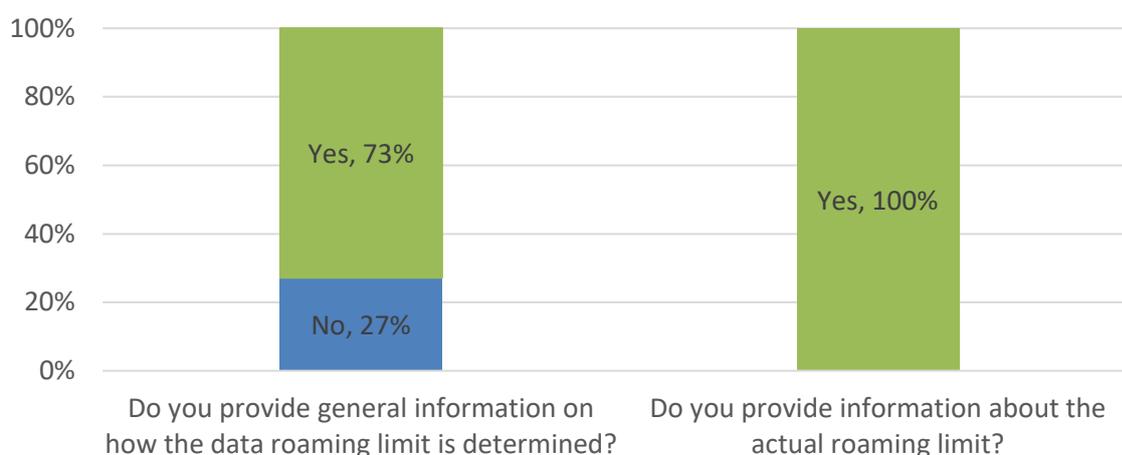


Figure 29: information about consumption regarding the fair use policy concerning open data bundles

Figure 29 shows that 73 % of the responding roaming providers which apply a fair use policy according to Art. 4 (2) CIR inform their customers about the overall roaming allowance or about how the roaming allowance can be calculated. In addition, every roaming provider which established a fair use policy according to the open data bundle rule provides information for customers about their actual roaming volumes.

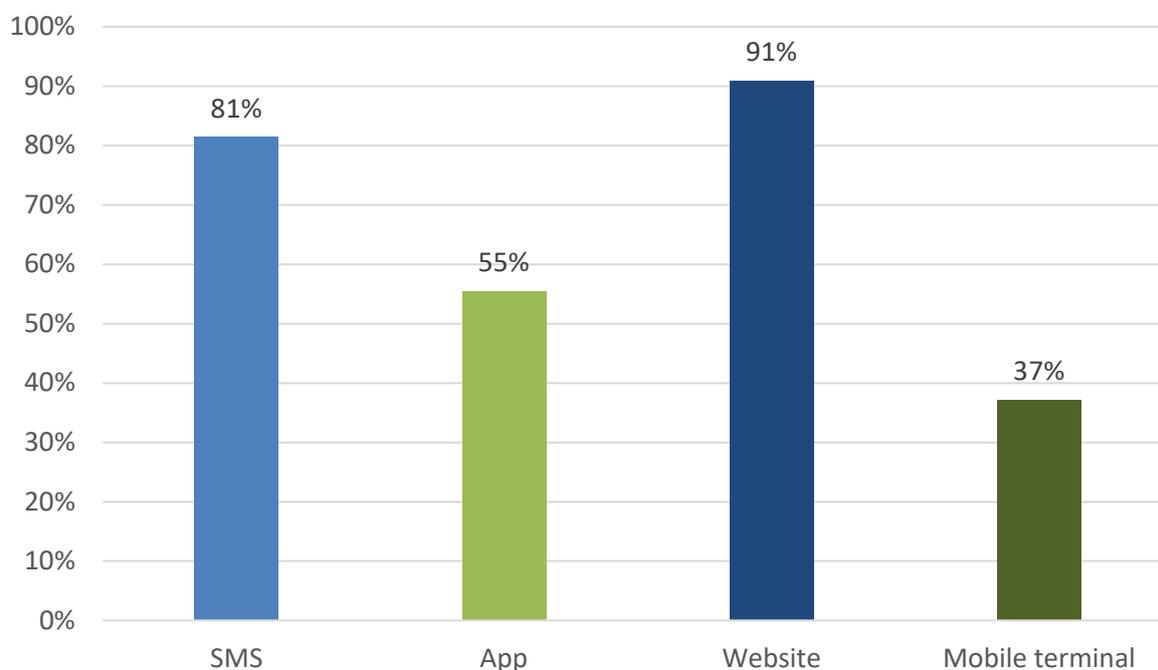


Figure 30: How information about charges and consumption regarding the fair use policy concerning open data bundles is provided

As Figure 30 shows, the actual roaming allowance is mostly provided via the roaming provider's website (91%) and by SMS (81%). Other ways to inform the customers are special apps on the mobile device (55%) and directly via the mobile terminal (37%).

4.8.2. Objective indicators

In addition to the open data bundle fair use policy, roaming providers are also allowed to implement a control mechanism over at least 4-month observation period. This control mechanism includes two objective indicators, the consumption and the presence of customers. In the event that a customer has both: a prevailing roaming presence and a prevailing roaming consumption, the roaming provider is allowed to apply surcharges for further use of the observed roaming service provided the customer has not amended their behaviour in that 2-week period. Therefore roaming providers must provide evidence after the 4-month observation window.

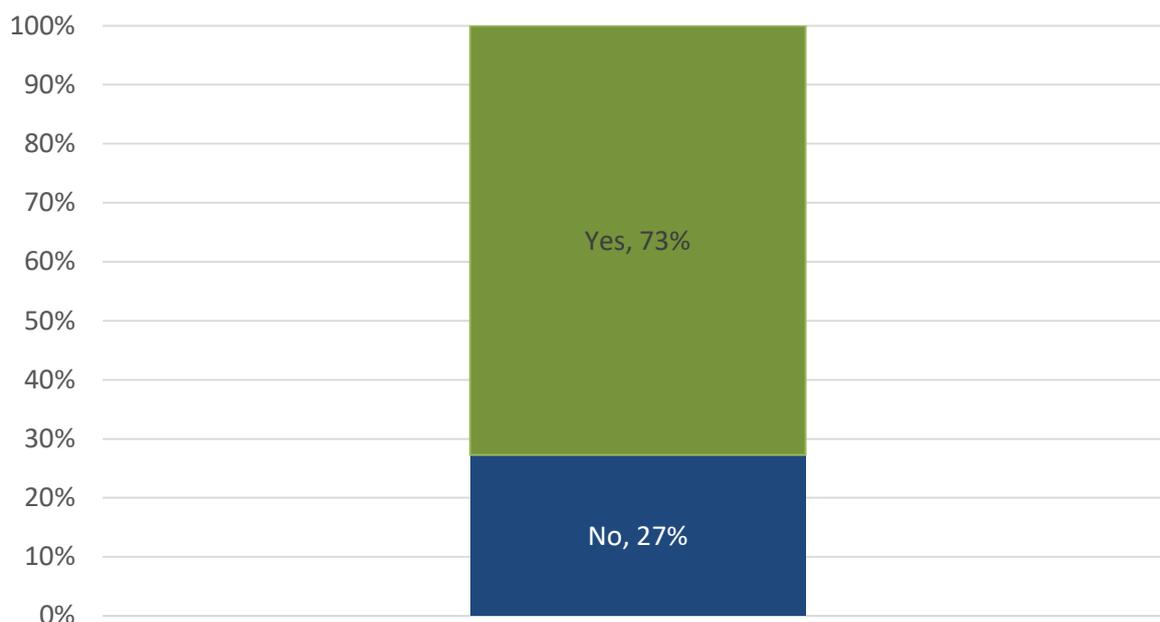


Figure 31: Provision of information, within the observation period, about charges and consumption in relation to the fair-use-policy as it applies to objective indicators

Therefore 73 % of the respondents state, that they already make such information available for their customers within the observation window.

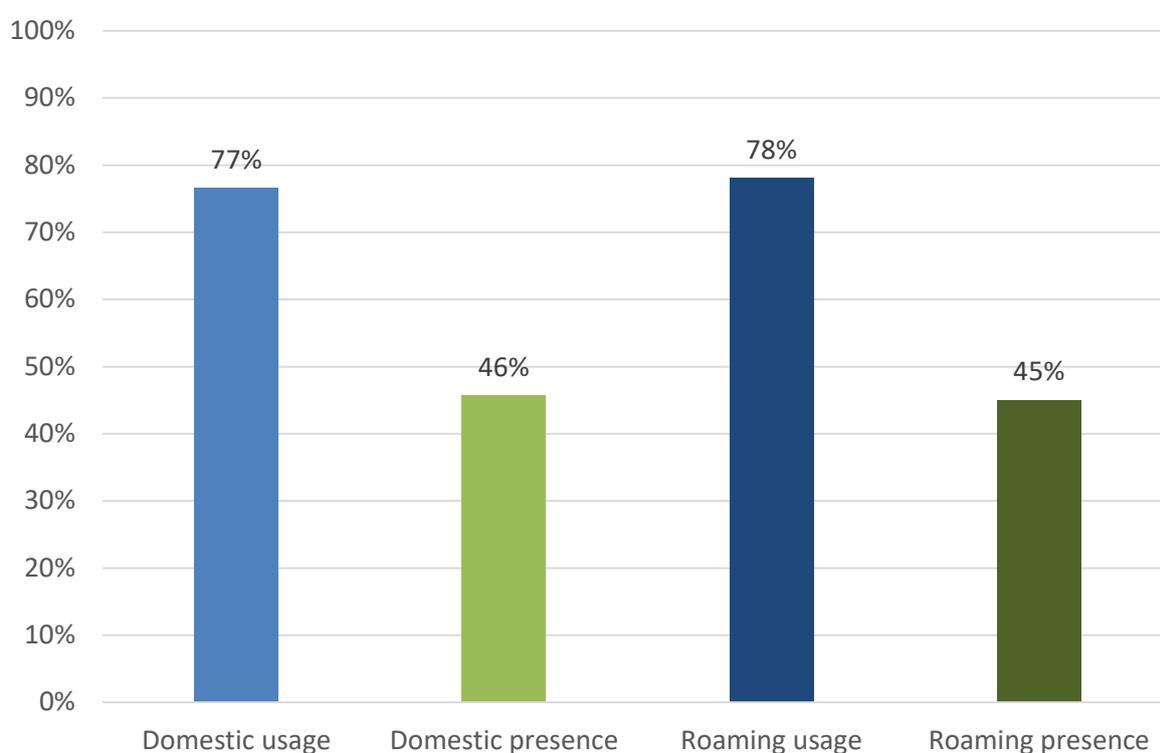


Figure 32: Information about usage and presence regarding the fair use policy concerning objective indicators

Roaming providers which provide such information mainly focus on the consumption of their customer; not on the presence control. More than three quarters of the operators provide information of usage (domestic 77 % and roaming 78 %) and 45 % of the respondents provide information on presence (domestic 46 % and roaming 45 %).

The roaming providers which inform their customers already within the observation window stated that such information is mainly presented either by SMS (64%) or via their website (64%).

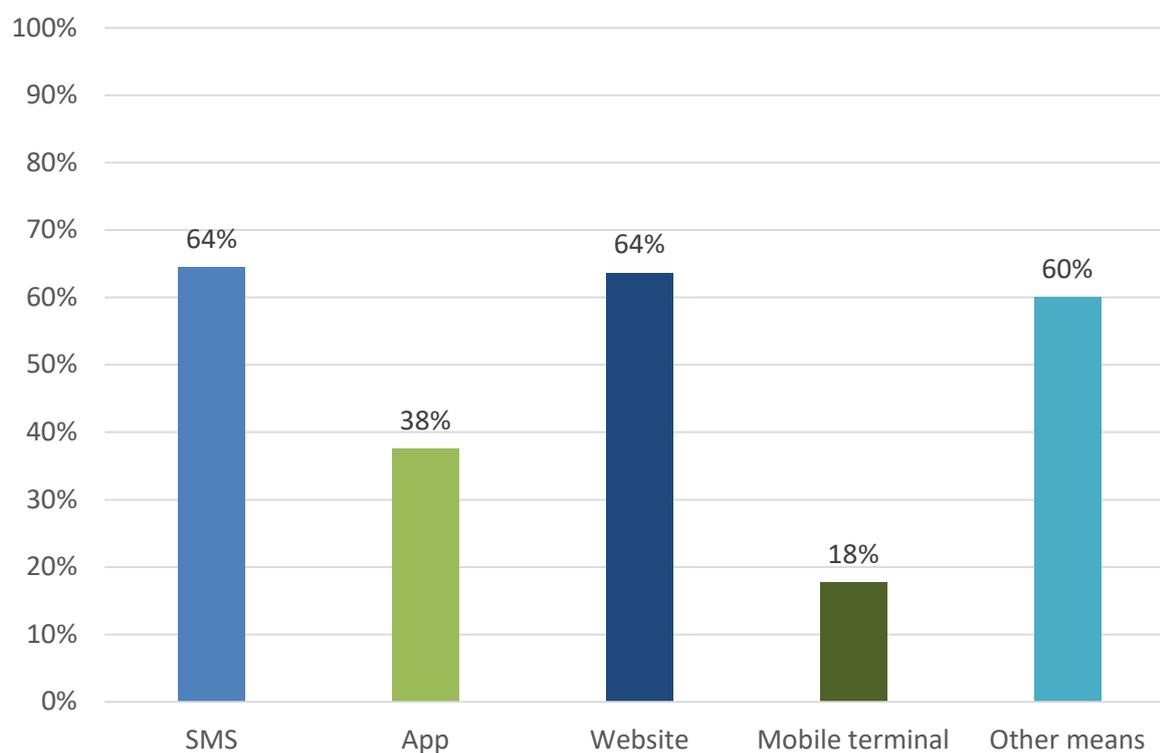


Figure 33: How information is provided about usage and presence regarding the fair use policy concerning objective indicators

As Figure 33 shows, other ways to inform customers about the usage and presence within the observation window are via other means (60 %), an app (38 %) or the mobile terminal (18 %).

5. Comparability of international roaming tariffs

5.1. Availability of tables for comparing tariffs

Roaming services have generally been sold as additional services in a bundle which included domestic mobile services. In the retail market, the focus of competition has been on domestic services - due to the fact that for the majority of users domestic services were of prime importance. The abolition of retail roaming surcharges has totally changed the premise for comparing retail roaming tariffs. From before being a complex variety of prices and packages for retail roaming, consumption within the EEA should now be deducted from the domestic allowance (except for domestic tariffs with charges per unit). The fair use policy and sustainability surcharges are however factors that influence the cost of the roaming services and might make comparisons of tariffs more complex. Alternative tariffs for roaming may also contribute to the variety of tariffs. In any case, the availability of information to allow the comparison of different tariffs is a first step to empower customers to take informed decisions on mobile and roaming offers.

5.1.1. Tables on the providers' websites comparing tariffs available to customers

BEREC asked providers if they offered any tables or tools on their websites that enable customers to compare alternative roaming tariffs with regulated roaming tariffs.

Among the providers that offer alternative tariffs, 34 % reported that they offered tables for such comparison. A closer look at the links that were provided showed, however, that only a small part of the providers actually allow customers to compare tariffs at a glance. Most providers either present the different tariffs separately (thereby not allowing a comprehensive comparison of tariffs) or just publish each of their tariffs for roaming in different zones (EU, USA, Asia,...) as well as their alternative offers.

5.1.2. Tables and assessment from consumer associations and other organizations

BEREC asked NRAs if consumer associations or any other organizations provided tables or any other information that allow the comparison of tariffs for international roaming services offered by different operators, as well as access for customers to publicly available reports comparing international roaming tariffs.

18 % of the responding NRAs are aware of such comparison tables or information. The information provided by the organizations focuses on general information about the Regulation, but also allows visitors to directly compare tariffs. The tables or information provides an overview of various tariffs, the volumes included in the packages and the data

volumes available for intra-EEA roaming⁶. 25 % of responding NRAs reported that consumer associations have published recommendations for end-users in order to help them select the most suitable international roaming tariff.

5.1.3. Tables on NRAs' websites comparing tariffs

38 % of the NRAs reported that in the period from May 2016 to 15 June 2017, they provided general recommendations for customers to help them select the most suitable international roaming tariff. BEREC also asked whether NRAs provided up-to-date information comparing tariffs for international roaming from different operators on their websites. 20 % of the NRAs reported that they provided such information and supplied a link. These websites seem to have been updated after 15 June 2017, and do no longer show the information that was given prior to the new Regulation. However, previous reports revealed that only a few NRAs provided a price comparison for roaming charges, most NRAs provided general information including the BEREC Guidelines and the Regulation itself. Only some of the NRAs had produced in this period a publicly available report or an overview on the comparison of international roaming tariffs.

After 15 June 2017, 28 % of the NRAs reported that they provided updated information on their websites comparing domestic tariffs including intra-EEA roaming provided by different operators. Some NRAs refer to their own price comparison tools, some have accreditation schemes for price comparison tools and one NRA provided links to the providers' own websites. None of the NRAs has produced any publicly available reports that compare domestic tariffs after 15 June 2017.

10 % of the NRAs reported that they provide updated information on their websites comparing alternative tariffs and 11 % of NRAs reported that they provide updated information on their websites comparing tariffs with a sustainability surcharge.

In the past, providing tables and reports to compare tariffs for international roaming from different operators was quite resource intensive as it required monitoring a variety of tariff plans in order to keep the information updated. However, the implementation of RLAH from 15 June 2017 has made the roaming regime more transparent for the customers and separate tables for comparing retail roaming tariffs may no longer be needed as they used to be. Side-by-side comparison of domestic tariffs including terms and conditions for intra-EEA roaming is more manageable. Relevant information about roaming includes whether the tariff is enabled for roaming or not, the volume of the data allowance for EEA roaming and if there are any surcharges applied to the tariff. The data collected for this report, has revealed that very, very few NRAs or consumer associations provide such tables with comparisons; the ones that do, however, do this in a clear and transparent way.

Some operators provide alternative roaming tariffs, however, only 34 % of them provide tables for comparing the alternative tariffs with regulated roaming tariffs.

⁶ https://www.arbeiterkammer.at/service/presse/AK_Erhebung_Bye_Bye_Roaming_.html and <https://taenk.dk/sites/default/files/Mobilabonement%20pristjek%206juni.xlsx>

5.2. Guidance for customers to estimate data traffic and tools to select a domestic tariff including intra-EEA roaming

Choosing the appropriate tariff can be difficult when dealing with such a wide variety of tariffs offered on the market. The volume of data included in the packages is generally a major factor in the price of the tariffs offered. Therefore, it is important that customers can estimate their need for data traffic in order to be able to make an informed choice.

Customers may estimate their need for data traffic based on, for example, previous usage or the need for different services. Many customers might use more mobile data while travelling abroad, since their phone often will connect automatically to Wi-Fi at home or at work. This could affect the choice of the most adequate tariff, especially if alternative tariffs are an option. Hence, any tools for estimating future data usage would support customers in choosing the most appropriate tariff.

In order to review the users' access to the information necessary for making informed decisions, BEREC asked whether NRAs, consumer associations and operators offer information, applications or other tools to estimate the consumption of data services and to decide which kind of tariff to select based on an estimation of consumption.

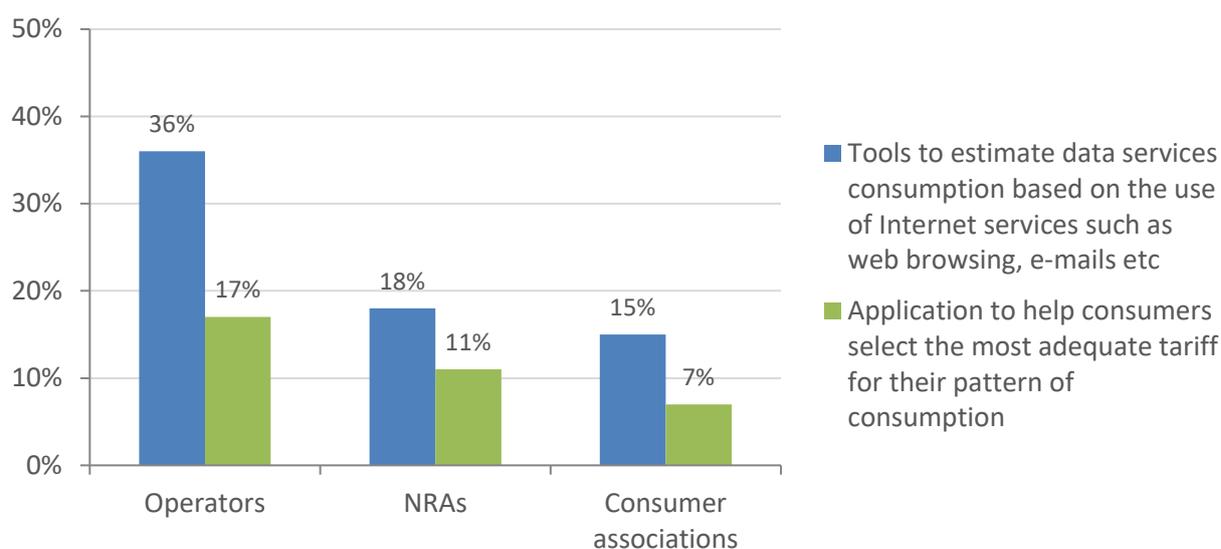


Figure 34: Tools and applications for comparison based on consumption per September 2017

36 % of the responding operators reported that they provided information or tools for estimating data consumption and 17 % of the operators reported that they provided applications to help consumers to select the most adequate tariff based on their consumption pattern. The operators refer to a broad range of tools. Some providers refer simply to their website where they present their tariffs, others refer to a website where customers can select a mobile phone and subsequently a tariff that can be combined with it and some refer to an app where customers can get information about their current consumption. Very few providers

actually have interactive tools where the customers' consumption patterns are the starting point for selecting the most adequate tariff.

18 % of responding NRAs provide applications to help customers to estimate the data traffic consumption of Internet services (e.g. web browsing, e-mails, specific applications etc.). 11 % reported that they provide tools for selecting the appropriate tariff based on an estimation of consumption. A few NRAs (7 %) had applications to help consumer select the most adequate roaming tariff based on consumption before 15 June 2017.

15 % of NRAs reported that consumer associations or other organizations provided applications for estimating data traffic consumption in their Member State. Only 7 % of NRAs reported that consumer associations were providing tools for selecting the appropriate tariff based on an estimation of consumption

Approximately one third of the responding operators say they provide information and tools to estimate data consumption. There are also a few NRAs and consumer associations that provide such tools. However, the need for such tools is probably not as strong as in the past, as most consumers have access to information about their previous data consumption and therefore can estimate their needs for data volumes.

Some operators have tools or applications to help consumers select the most adequate domestic tariff for their pattern of consumption and a few NRAs and consumer associations have such tools for comparing tariffs between operators.

Annex 1: Questionnaire sent to NRAs

1. Identification			
Name of the NRA:			
Country:			
Contact person (name):			
Contact person (e-mail):			

2. Complaints on transparency (received from July 2016)			
		Yes/No	Total number of complaints (if Yes)
2.1.	Have you received complaints from end-users on transparency issues?		
2.2.	If yes, please select the relevant issues from the list below	Yes/No	Number of complaints
2.2.1.	The RLAH tariff wasn't applied automatically		
2.2.2.	Roaming volumes were not billed correctly		
2.2.3.	End-users who were no longer able to use roaming because roaming was blocked		
2.2.4.	End-users who were not clearly informed or were wrongly informed of the FUPs (including the restriction levied on the roaming data volumes)		
2.2.5.	End-users who were not clearly informed that for on-net calls made while roaming in the EU would be charged the price of calls to other national networks.		
2.2.6.	End-users who were not clearly informed or were wrongly informed on how the domestic discounts would be applied when roaming in the EEA		
2.2.7.	End-users who were not aware about being on an alternative tariff		
2.2.8.	Lack of welcome-SMS		
2.2.9.	Cut-off limit for data did not activate as end-user expected		
2.2.10.	End-user did not know that international calls are not covered by the regulation		
2.2.11.	End-user did not know that calls to free-numbers in roaming may have a charge		
2.2.12.	End-user did not know the price to call to premium-rate services in roaming		
2.2.13.	End-user was not informed of charges applying outside EEA		
2.2.14.	Roaming in planes/ships		

		Yes/No	Total number of complaints (if Yes)
2.3.	Have you received complaints from end-users on issues related to the FUP? (received from 15 June 2017)		
2.4.	If yes, please select the relevant issues from the list below	Yes/No	Number of complaints
2.4.1.	Customers were unaware, by looking at their contracts, of the documents they would need to provide to prove normal residency or stable links (where this is required).		
2.4.2.	Customers were not aware, by looking at their contracts, of the FUPs (including the restriction levied on the roaming data volumes) or on the application control mechanisms of presence/traffic)		
2.4.3.	Customers were not alerted of opportunities to change their usage pattern once the observational period had ended.		
2.4.4.	Surcharges were applied despite users being unaware that the fair use limit had been reached.		
2.4.5.	Other? If so, please provide details below:		

3.1. Information available to end-users on the NRA website facilitating comparison of tariffs (made public from May 2016 - June 2017)			
		Yes/No	
3.1.1.	Is there updated information on your website comparing tariffs for international roaming services provided by different operators?		
3.1.2.	If yes, please provide the link		
		Yes/No	
3.1.3.	Have you produced any publicly available report which compares international roaming tariffs?		
3.1.4.	If yes, please provide the link		
		Yes/No	
3.1.5.	Do you publish any set of general recommendations for end-users in order to help them select the most adequate international roaming tariff?		
3.1.6.	If yes, please provide the link		
		Yes/No	
3.1.7.	Is there any application provided by your NRA available for end-users to decide which type of tariff to select based on an estimation of consumption for international roaming?		
3.1.8.	If yes, please provide the link		
		Yes/No	
3.1.9.	Does your NRA provide any application or information for end-users to estimate data services consumption based on the use of Internet services such as web browsing, e-mails, and specific applications as Google Maps or Whatsapp?		
3.1.10.	If yes, please provide the link		

3.2. Information available to end-users on the NRA website facilitating comparison of RLAH tariffs (made public from 15th June 2017)	
	Yes/No
3.2.1.	Is there updated information on your website comparing domestic tariffs including intra-EU roaming, provided by different operators?
3.2.2.	If yes, please provide the link
	Yes/No
3.2.3.	Is there updated information on your website comparing alternative roaming tariffs (including tariffs that combine intra-EU and Rest of the World roaming)?
3.2.4.	If yes, please provide the link
	Yes/No
3.2.5.	Is there updated information on your website comparing tariffs that have a sustainability surcharge?
3.2.6.	If yes, please provide the link
	Yes/No
3.2.7.	Have you produced any publicly available report which compares domestic tariffs that includes roaming?
3.2.8.	If yes, please provide the link
	Yes/No
3.2.9.	Is there any application provided by your NRA available for end-users to decide which type of tariff to select based on estimation of domestic and roaming consumption?
3.2.10.	If yes, please provide the link

4. Information available to end-users provided by consumer associations or other organizations facilitating comparison of tariffs (made public from May 2016)	
	Yes/No
4.1.	Do consumer associations or any other organization provide tables or any other information comparing tariffs for international roaming from different operators?
4.2.	If yes, please provide the link
	Yes/No
4.3.	Have consumer associations or any other organization produced any publicly available report which compares international roaming tariffs?
4.4.	If yes, please provide the link
	Yes/No
4.5.	Have consumer associations or any other organization published any set of recommendations for end-users in order to help them select the most adequate international roaming tariff?
4.6.	If yes, please provide the link
	Yes/No
4.7.	Is there any application provided by consumer associations or any other organization available for end-users to decide which type of tariff to select based on an estimation of their consumption for international roaming?
4.8.	If yes, please provide the link
	Yes/No
4.9.	Do consumer associations or any other organization provide any application or information for end-users to estimate data services consumption based on the use of Internet services such as web browsing, e-mails, and specific applications as Google Maps or Whatsapp?
4.10.	If yes, please provide the link

5. Information on applications for sustainability surcharges	
5.1.	How many applications have you received?
5.2.	How many applications were granted?
5.3.	How many applications were refused?
5.4.	Please, indicate the basis for the refusal
5.5.	If available, please provide the link to any published information related to this
5.6.	Were the granted applications related to providers in the business or consumer segment or both?
5.7.	Were the granted applications from MNOs, MVNOs or SPs? And how large is their domestic market share?
5.8.	What is the level of the surcharge being applied?
5.9.	Please provide any relevant information about the level of the surcharges
5.10.	Are the surcharges applied for all tariffs?
5.11.	If no, please provide further details
6. Any other input that can be considered useful by the NRA	
6.1.	Please, include any additional information that you consider useful for the BEREC report on transparency and comparability of tariffs

Annex 2: Questionnaire sent to Operators

1. Identification		
Name of the provider	<input type="text"/>	
Country	<input type="text"/>	
Type of provider (mark with a cross in the corresponding cell)	<input type="checkbox"/>	MNO
	<input type="checkbox"/>	Full MVNO
	<input type="checkbox"/>	Light MVNO/Reseller

All questions should be answered based on the current situation.

2. Structure of tariffs for international roaming (intra-EU)			
2.1 Structure of default regulated tariffs according to Article 6a			
Please, respond Yes/No in the corresponding cells.			
		Available Yes/No	Comment
2.1.1.	Do you apply an open bundle data limit?		
	a) You apply data limit to every tariff plan classified as "open data bundle" bundle"		
2.1.2.	Have you implemented the stable link criterion		
	a) You apply stable link criterion to every tariff plan		
2.1.3.	Have you implemented the control mechanism		
	a) You apply the control mechanism to every tariff plan box)		
	c) If yes, what is the observation resolution (daily, weekly, monthly ...)?		
	d) If yes, what are the services observed: voice only, sms only, data only, all services		
2.1.4.	Have you implemented other objective indicators?		
	a) If yes, please specify in the comment box (long inactivity and/or subscription and sequential use of multiple SIM cards)		
2.1.5.	Do you include non-EEA destinations in some of your offers?		
2.2 Structure of alternative roaming tariffs according to Article 6e (3)			
Please see BEREC Guidelines 87-93 for further information			
		Available Yes/No	Comment
2.2.1.	Daily packages		
2.2.2.	Weekly packages		
2.2.3.	Monthly packages		
2.2.4.	Other tariffs, please give a short description		
2.2.5.	Do you include non-EEA destinations?		
2.3 Tariffs without roaming			
		Available Yes/No	Comment
2.3.1.	Do you offer tariffs without roaming		
2.3.2.	If yes, please describe below what are these offers and why roaming is not provided		
	<input type="text"/>		
		Available Yes/No	Comment
2.3.3.	Were there any tariff plans to which roaming was withdrawn?		
2.3.4.	If yes, please describe below which was the reason to withdrawn roaming services from a tariff.		
	<input type="text"/>		

3. Information provided by operators**3.1 Welcome SMS regarding RLAH**

	Yes/No, N/A
3.1.1. Do you inform your customers in the "Welcome SMS" that the domestic tariff is applied while roaming?	
3.1.2. Do you provide information on applying a FUP in your "Welcome SMS"?	
3.1.3. Do you provide information on roaming limits in your "Welcome SMS" ?	

3.2 Alternative tariffs

	Alternative tariffs and regulated tariffs	Yes/No, N/A
3.2.1.	Do you inform end-users that have opted for alternative tariffs about the regulated tariff?	
3.2.2.	If yes, how do you inform them:	Yes/No, N/A
a)	Website	
b)	On the mobile terminal via SMS or application	
c)	Call center	
d)	Personal page e.g. MyPage	
e)	Point of sales	
f)	Bill	
g)	Other (comment box below)	
3.2.3.	If yes, how often do you remind end-users with alternative tariffs of the regulated tariff? (comment box) (comment box below (if other period indicated))	Please indicate period

	Alternative tariffs	Yes/No, N/A
3.2.4.	Are there any activation charges applied when switching between one alternative tariff to another alternative tariff?	
3.2.5.	Also for alternative tariffs limited in time, do you inform end-users about the tariffs/charges they have to pay for roaming services when their alternative tariff period ends?	
3.2.6.	Do you inform end-users actively when they ...	
a)	reach the limits included in the bundle ?	
b)	reach a certain percentage of the limits in the bundle (please specify the percentage)	
3.2.7.	Regarding alternative roaming bundles, do you inform end-users using an alternative tariff (via SMS, website, etc.) about the charges applied for out-of-bundle consumption?	
3.2.8.	Please list any other means here:	

3.3 Switching between tariffs

3.3.1. Where do you provide information concerning switching between tariffs ?

a) Website	Yes/No, N/A	
b) Mobile terminal (e.g. via a short message)		
c) Call center		
d) Point of sales		
e) Any other mean (please specify)		
f) If "Any other mean" has been marked as "Yes", please describe		

3.4 Information for end-users about charges and consumption for intra-EU roaming

	Historical information (bill)		Real-time information	
	Charges	Volumes	Charges	Volumes
3.4.1. Do you provide separate itemized information on international roaming intra-EEA outgoing voice calls?				
3.4.2. Do you provide separate itemized information on international roaming intra-EEA incoming calls?				
3.4.3. Do you provide separate itemized information on international roaming intra-EEA SMS sending?				
3.4.4. Do you provide separate itemized information on international roaming intra-EEA data services?				

3.4.5. In case you are providing information for charges and/or volumes consumption, please, identify how this information is provided to end-users

	Historical		Real-time	
	Yes/No, N/A		Yes/No, N/A	
a) Website				
b) Interaction via the mobile terminal (e.g. via a short message)				
c) Call center				
d) Specific app available for installation in the terminal				
e) Any other means (please specify)				
f) If "Any other means" has been marked as "Yes", please describe				

3.5 Information about charges and consumption within a FUP

In case that roaming volumes are calculated according the open data bundle rule ...

	Yes/No, N/A	Comment
3.5.1. Do you provide general information on how the data roaming limit is determined?		
3.5.2. Do you provide information about the actual roaming limit?		
If yes, how do you provide information on actual available roaming volumes to the end-user?		
3.5.3. a) SMS		
b) App		
c) Website		
d) Mobile terminal		
e) By any other means (please specify below)		

In case that the control mechanism is applied ...

	Yes/No, N/A	Comment
3.5.4. Do you provide information within the observation period?		
3.5.5. Do you provide information on		
a) domestic usage		
b) domestic presence		
c) roaming usage		
d) roaming presence		
e) How do you provide such information?	Domestic services	Roaming services
f) SMS		
g) App		
h) Website		
i) Mobile terminal		
j) By any other means (please specify below)		

4 Information and tools to compare tariffs for international roaming

4.1 Tables comparing all international roaming tariffs

4.1.1. Is there any table for end-users comparing alternative tariffs with regulated roaming tariffs available on your website?

4.1.2. If yes, please, provide the link	Yes/No, N/A	
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4.2 Tools for selecting the most adequate domestic tariff including intra-EU roaming based on estimation of consumption

4.2.1. Do you provide end-users with any application to help them select the most adequate tariff for their pattern of consumption?

4.2.2. If yes, please, provide the link	Yes/No, N/A	
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4.3 Information for end-users on estimating data traffic consumption

4.3.1. Do you provide end-users with information on how to estimate data services consumption based on the use of Internet services such as web browsing, e-mails, and specific applications as Google Maps or Whatsapp?

4.3.2. If yes, please, provide the link	Yes/No, N/A	
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5. Any other input that can be considered useful by the provider