

BEREC Report on Transparency and Comparability of International Roaming Tariffs

10 December 2020

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Executive summary and main findings

This report provides an overview of the transparency and comparability of retail roaming tariffs. In July 2020, BEREC sent a questionnaire to operators and National Regulatory Authorities (NRAs) in order to gather information for the period September 2019 to July 2020 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.

Transparency is key to enabling customers to make informed decisions. According to the Regulation (EU) No 531/2012 on roaming on public mobile communications networks within the Union as amended by the TSM Regulation 2015/2120 and Regulation 2017/920, (hereafter “Roaming Regulation”) and the Commission Implementing Regulation 2016/2286 (hereafter “CIR”) customers should have easy access to understandable information on prices and conditions for each existing roaming tariff including its Fair Use Policy (FUP) if applicable. According to the Roaming Regulation, it should also be possible to switch between roaming tariffs quickly and conveniently. BEREC has collected information on the structure of international roaming tariffs.

In view of the application of FUPs, BEREC found that roaming providers make use of all kinds of FUP laid down in the CIR. It is worth noting, that limiting roaming data volumes according to the provisions for open data bundles is the most used policy.

With regard to alternative tariffs in addition to regulated roaming tariffs, around 30 % of the responding operators said that they offer alternative roaming tariffs. According to the answers received, BEREC has also noted that roaming providers in addition to the EEA also include non-EEA destinations to their RLAH tariff plans. BEREC intends to analyse under which conditions non-EEA countries are included in RLAH tariff plans in further transparency and comparability reports.

Finally, on the structure of roaming tariffs this year's evaluation confirmed the findings of previous years concerning tariffs without roaming. Mainly data only and fixed mobile convergence plans do not include roaming options due to the fact that in general a high domestic data volume is granted in those tariffs.

Regarding the availability of 4G data roaming services, 41 % of the operators stated¹ that they offer 3G roaming services in the EU/EEA even where 4G would be available and 13 % of those operators are not planning to provide 4G roaming services by the end of 2020 or don't have any plans at all.

¹ The question addressed to operators did not specify that operators replying positively offer 3G across all roaming networks and all Member States. Therefore, it is not clear, if those operators responding with yes, apply this restriction to all countries and all networks.

With regard to 5G, BEREC observes that operators start implementing 5G across Europe, however the speed of implementation varies between Member States and operators. Yet, there is no nation-wide 5G coverage in any of the Member States. Therefore, it is too early to draw any conclusions about 5G and roaming.

When BEREC asked whether NRAs had received consumer complaints about roaming, 81 % of the responding NRAs said that they had received complaints on roaming issues. This is almost the same compared to the previous reporting period. However, there has been a decrease in the total number of registered complaints of around 45 %. The categories of complaints that are most frequent are still end-users that inadvertently roam on a non-EU network while remaining on EU territory and about roaming when being on board of planes and ships, which is not covered by the Roaming Regulation. However, the number of NRAs that have received such complaints has decreased since the previous report.

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, a total amount of 21 applications for sustainability surcharges have been received for the period 1 September 2019 to 31 July 2020. Out of these 21 applications, 16 were granted. In this year's survey, a small share of roaming providers (6 %) said that they charge surcharges based on the derogation mechanism. It seems that after a certain acclimatization phase of the RLAH principle with large numbers of applications, RLAH is no longer a threat to the domestic charging models of most of the mobile providers.

BEREC asked operators if they informed customers about the FUP applied in its "Welcome SMS"². 82 % of the operators that apply a FUP provide information about it in the "Welcome SMS".

Regarding the opportunity to switch between tariffs, providers reported that they mainly informed their customers via call centres or through information on their website or in the contract.

Another question dealt with the information provided by operators to end-users about the FUP. 75 % of the roaming providers who implemented a FUP inform their customers about how the fair use limit is calculated. 98 % of the roaming providers state that they provide information about the actual roaming limit. This is about the same level as in the previous period.

The most commonly requested means of proof by roaming providers who have implemented stable link criteria are: A presentation of any valid document which proves that the person falls into one of the categories of stable links (68 %), details of the customer's

² The Welcome SMS is an SMS sent by roaming providers to their customers when they enter a country different from the one where their mobile subscription is issued.

address and/or details showing the provision of any other services to them at the given address (e.g. a utility bill) (52 %) and a declaration by the customer (51 %).

The data collected for this report shows that a few NRAs or consumer associations provide tariff comparisons. 24 % of the responding NRAs reported that they featured information on their website comparing domestic tariffs including intra-EEA roaming provided by different operators.

Customers should be able to select the most suitable tariff based on their own estimated pattern of consumption. In this regard, 34 % of the operators responded that they provided 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 such as Google Maps or WhatsApp.

1. Introduction and objectives of the document

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 of the Roaming Regulation. Furthermore, the switch from or to the regulated roaming tariff pursuant to Article 6e (3), subparagraph 3, has to be made free of charge and within one working day.

Since RLAH came into force on 15 June 2017, roaming providers must inform subscribers about the FUPs implemented in their tariffs and about the conditions for any alternative tariff chosen by end-users. Such an awareness, together with policies and instruments which allow customers to estimate their consumption and compare international roaming tariffs, will allow customers to make better informed decisions.

In line with the provisions set out in the Roaming Regulation, the report that covers the period from September 2019 to July 2020 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 information collected by BEREC on the basis of which the Commission is able to assess whether offers are transparent, and to investigate transparency issues concerning charges which may be applied or other billing issues.
- To examine the 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.

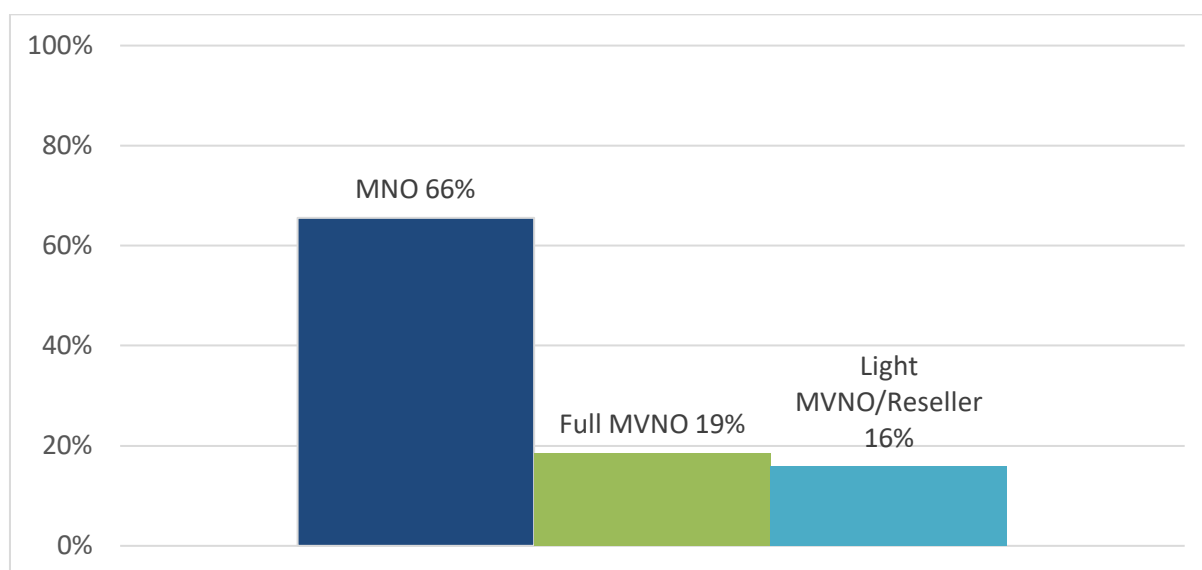
2. Information collected by BEREC

In order to investigate whether customers face transparent conditions (in the implementation of the RLAH regime), and are able to compare different tariffs, BEREC prepared two questionnaires: One addressed to operators and one to NRAs.

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, the geographical area or any other restrictions as well as any linkages to domestic tariffs or FUPs or derogations, etc.). Operators were requested to provide information on the structure of tariffs for international roaming, the structure of alternative tariffs and the tariffs without roaming. In addition, questions regarding the information provided by operators in general for roaming and the available price comparison tools for international roaming were addressed to operators.

NRAs were requested to provide any information on customer complaints concerning any alleged lack of transparency, information on applications for sustainability surcharges and information available to end-users to facilitate the comparison of RLAH tariffs.

Figure 1: Type of operators submitting feedback



A total of 29 NRAs and 151 mobile providers operating in EEA countries sent their responses to BEREC. 66 % of the responses corresponded to MNOs and 35 %³ to full MVNOs or light MVNOs and resellers, as shown in Figure 1.

³ In some graphs the percentages do not sum up exactly to 100 % due to rounding of numbers.

3. Structure of tariffs

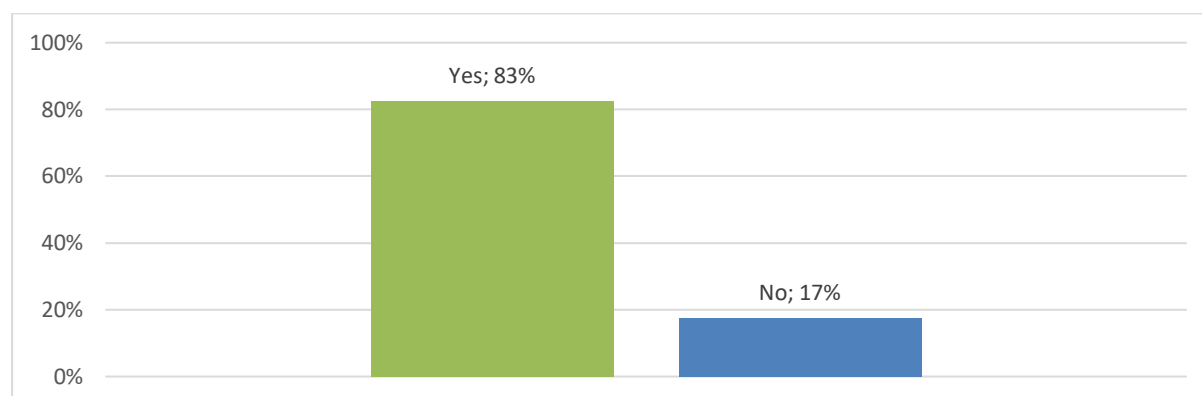
Pursuant to Article 6a of the Roaming Regulation, roaming providers shall not levy any surcharge in addition to the domestic retail price on roaming customers in any Member State for any regulated roaming calls made or received, for any regulated roaming SMS sent and for any regulated data roaming services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

Nevertheless, roaming providers are entitled to apply surcharges exceptionally in case a fair use limit is reached or in case the sustainability of their domestic charging model is at risk and they have applied for and been granted a derogation from the RLAH rules by the competent NRA. Detailed rules on the application of FUP and on the methodology for assessing the sustainability of the abolition of retail roaming surcharges are contained in the CIR. Moreover, roaming providers are allowed to offer alternative tariffs according to Article 6e (3) of the Roaming Regulation in addition to regulated roaming services. Lastly, mobile providers are not obliged to offer roaming services and therefore can restrict tariff plans or services to domestic use only. Against this backdrop, BEREC in the following chapter has analysed tariff plans, their structure and services included in those plans.

3.1. Application of FUPs on regulated roaming services

BEREC has collected information from operators regarding the structure of default regulated tariffs, pursuant to Article 6a of the Roaming Regulation. In particular, BEREC was interested in whether operators have implemented the stable link criterion, whether they apply an open data bundle limit, whether they make use of the control mechanism and the monitoring of the objective indicators as described in Article 4 (4) CIR. BEREC also collected information on whether non-EEA destinations were included in the regulated tariffs. According to the answers received roaming providers in addition to the EEA also include non-EEA destinations to their RLAH tariff plans. BEREC intends to analyse under which conditions non-EEA countries are included in RLAH tariff plans in further transparency and comparability reports

Figure 2: FUP – Does your company offer tariff plans applying a FUP according to the CIR

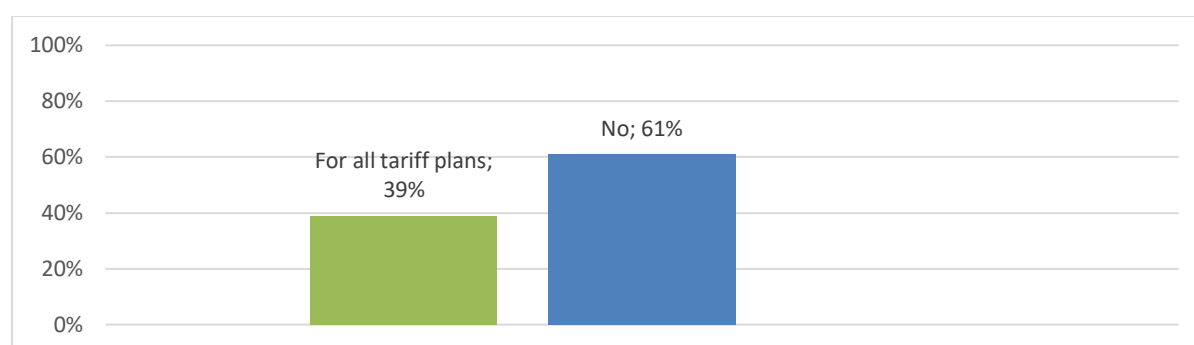


In general, 83 % of the respondents answered that they are applying a FUP to their roaming tariffs.

3.1.1. Stable link (Article 4 (1) CIR)

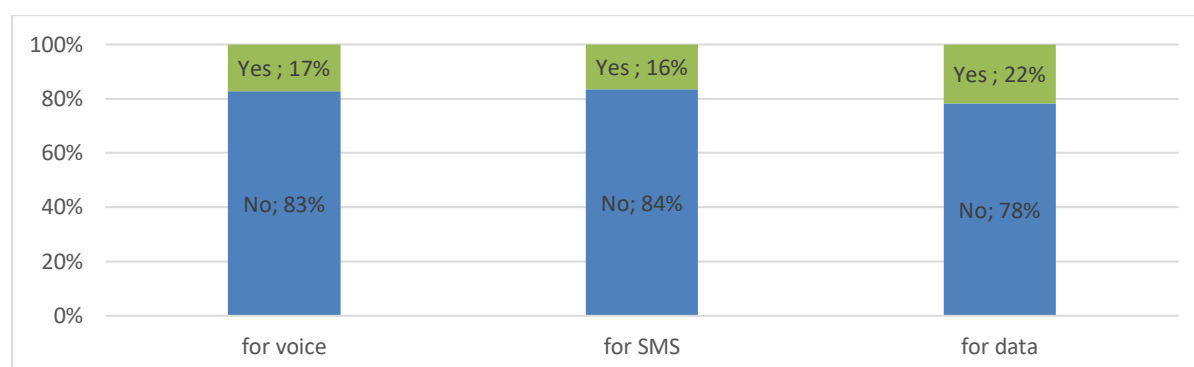
The stable link FUP is laid down in Article 4 (1) of the CIR. According to this principle operators can require a proof of permanent presence of their customers. According to the respondents 39 % apply the stable link concept for all tariff plans and almost two third of the operators do not apply such a FUP.

Figure 3: FUP – Does your company apply a stable link criterion acc. to Art. 4 (1) CIR?



From those roaming providers who make use of the stable link criteria 11% require a stable link for prepaid offers, 41 % for post pay offers and nearly the half for both kinds of plans.

Figure 4: FUP– Has your company levied surcharges due to Article 4 (1) CIR?



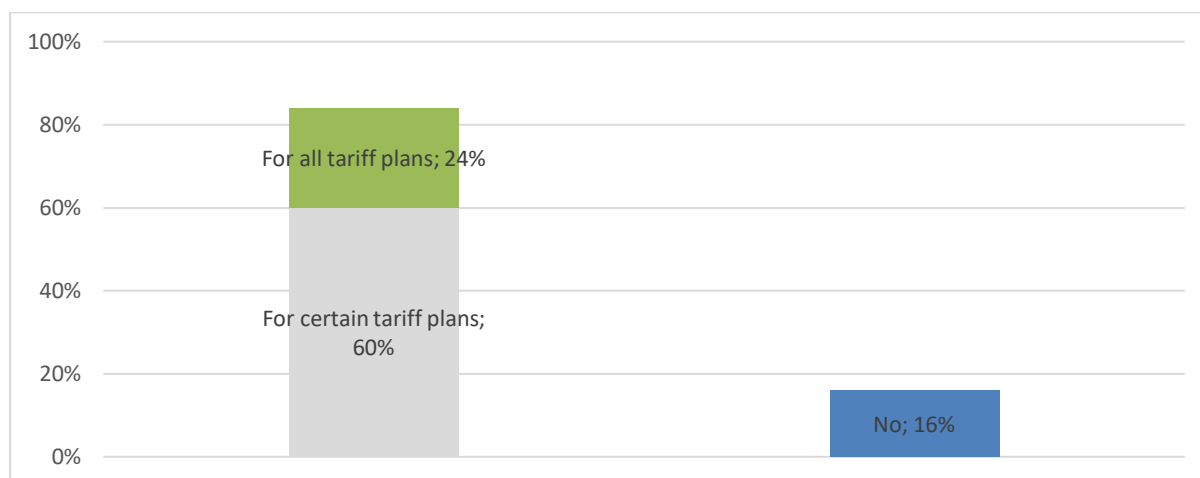
In the event that customers cannot or do not want to provide a stable link, the roaming provider is entitled to apply a surcharge for the provision of roaming services. 17 % of the respondents implementing the stable link concept applied a surcharge to its customers for voice services, 16 % said that they levied surcharges for SMS and 22 % for data services due to the lack of a stable link.

3.1.2. Open data bundles (Article 4 (2) CIR)

In view of tariff plans which include an unlimited domestic data volume or where the price per unit – derived by dividing the total price of the tariff plan by the total data volume – is

lower than the maximum wholesale data cap, operators are allowed to limit data roaming volumes according to the calculation referred to in Article 4 (2) of the CIR.

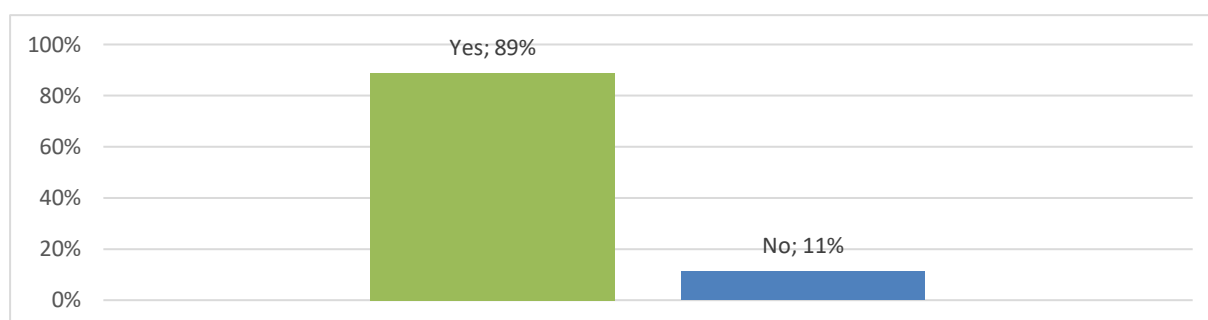
Figure 5: FUP – Does your company apply open data bundle FUP according to Article 4 (2) CIR?



From all responding operators, as shown in Figure 5, 24 % applied a data limit to every tariff plan classified as “open data bundle”. At the same time, 60 % of these operators apply a data limit only to some of the tariff plans classified as “open data bundle”. 16 % of the respondents said that they do not make use of such a FUP.

Figure 6 shows that, when it comes to the calculation of the minimum data roaming allowance which has to be granted for customers, nearly 90 % of the responding providers that apply open data bundle FUP perform calculation in accordance to the detailed formula referred to in the CIR.

Figure 6: FUP – Is the data roaming limit calculated acc. to the calculation laid down in the CIR?

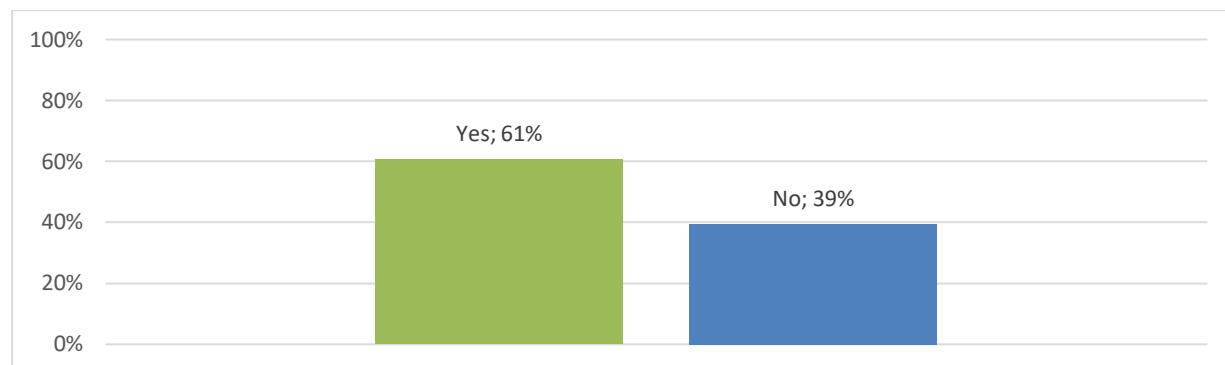


Furthermore, 11 % of the roaming providers are not calculating the roaming allowance according to Article 4 (2) CIR. Those roaming providers are deviating from the minimum limit and granting higher data roaming volumes. According to their input in most cases this is done by rounding the calculated volume up in favour of the customers. According to these participants of the survey another reason for granting more than the minimum roaming limit is commercial.

In cases, where the (minimum) data roaming allowance based on Article 4 (2) CIR is used, the roaming providers are entitled to levy surcharges for the subsequent data usage of the

customer travelling in the European Union. Figure 7 shows that 61 % of the responding roaming providers applied a surcharge to their customers after the granted data roaming allowance was exhausted.

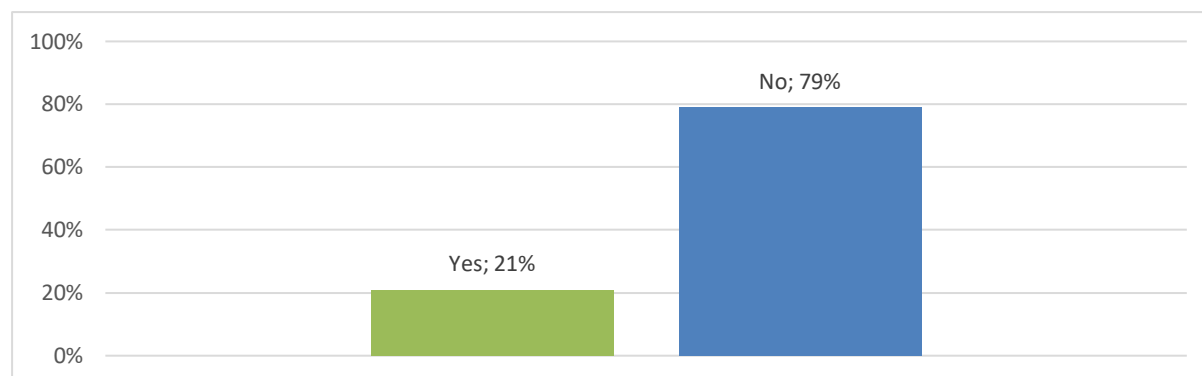
Figure 7: FUP – Has your company levied surcharges for data roaming due to Article 4 (2) CIR?



3.1.3. Prepaid data roaming limits (Article 4 (3) CIR)

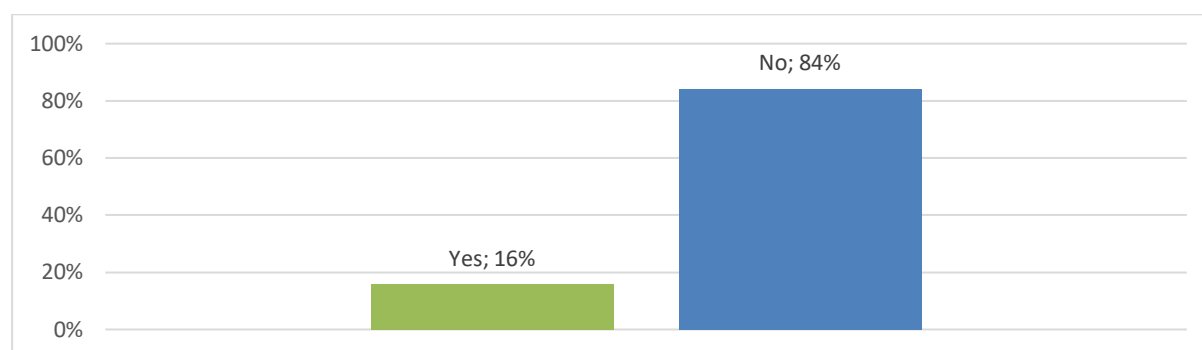
Another FUP roaming providers may make use of is the limiting of data volumes for prepaid plans according to Article 4 (3) CIR.

Figure 8: FUP – Does your company apply a data roaming limit for prepaid acc. to the CIR?



Around a fifth of the respondents, who said that they apply any FUP, indicated that they limited the data usage of prepaid offers.

Figure 9: FUP – Has your company levied surcharges for data roaming services acc. to the CIR?



16 % of the roaming providers, who are limiting the data volumes of prepaid offers, answered that subsequently they have also applied surcharge for data usage exceeding the regulated FUP limit.

3.1.4. Objective indicators (Article 4 (4) CIR)

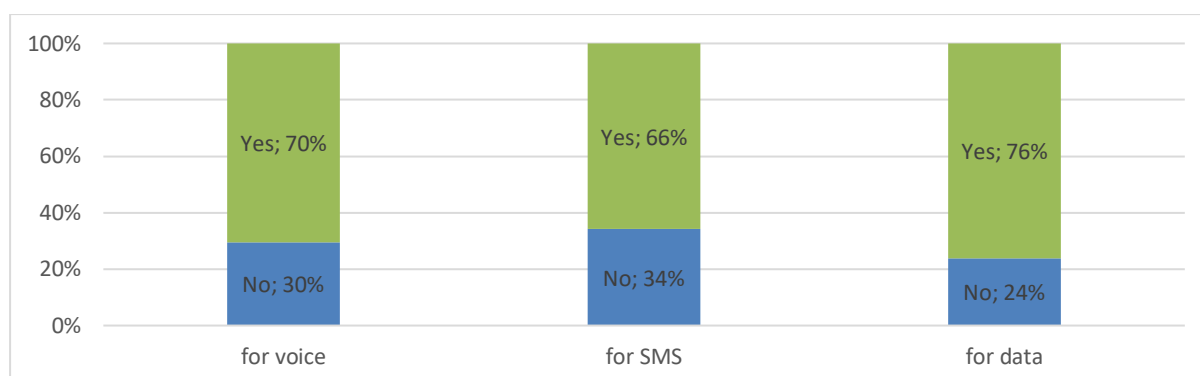
Article 4 (4) CIR gives roaming providers the opportunity to observe and in case of abusive or anomalous usage of roaming services to surcharge the use of regulated roaming services. Therefore, roaming providers must observe the presence and the usage of roaming customers and based on this observation must prove that both the presence and the usage have not prevailed to that in other Member States.

Regarding the implementation of this control mechanism, Figure 10 shows that slightly more than half of the respondents (40 % for all roaming tariff plans, 13 % for certain roaming tariff plans) implemented the control mechanism for all roaming tariff plans and nearly the other half (47 %) has not implemented the control mechanism.

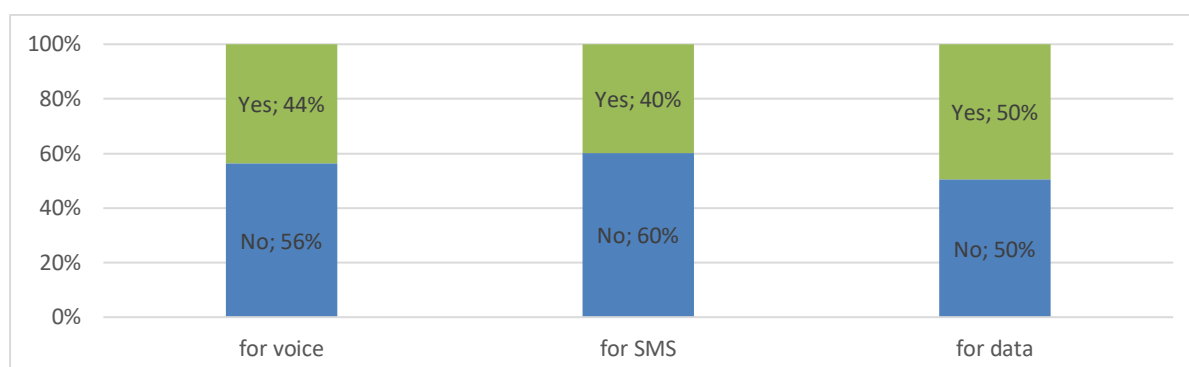
Figure 10: FUP – Does your company apply a control mechanism / objective indicators acc. Article 4 (4) CIR?



From the 53 % of roaming providers, who have implemented the control mechanism, 40 % mentioned that they observe postpaid plans and 59 % observe both postpaid and prepaid tariff plans. It is worth mentioning that 80 % stated that the observation window within their control mechanism is according to the CIR, i.e. 4 months. This, however means that one fifth is having a longer observation period than the minimum observation period of 4 months established in the CIR.

Figure 11: FUP – Which roaming services does your company observe?

In view of the observed services by the roaming service providers, 70 % answered that they observe voice services, 66 % answered that they observe SMS services and finally 76 % of roaming providers which have implemented a control mechanism analyse how much and where data services are used by customers.

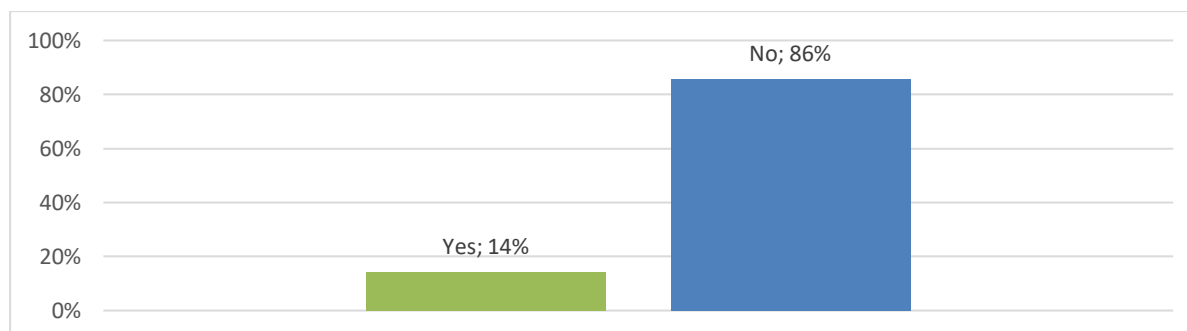
Figure 12: FUP – Has your company levied surcharges for roaming services due to Art. 4 (4) CIR?

In general, about one third of the providers applying a control mechanism indicated that the application of surcharges was due to their control mechanism. The affected services are quite balanced and are in the range of 40 % - 50 % (voice 44 %, SMS 40 %, data 50 %).

Besides a control mechanism based on objective indicators laid down in Article 4 (4) CIR, roaming providers may also apply other objective indicators. 14 % of the respondents apply other objective indicators.

Respondents, who answered that they use other objective indicators, mentioned mainly that they pay a lot of attention to the long inactivity and sequential use of SIM cards.

Figure 13: FUP – Does your company apply other objective indicators (e.g. long inactivity and/or subscription and sequential use of multiple SIM cards?)



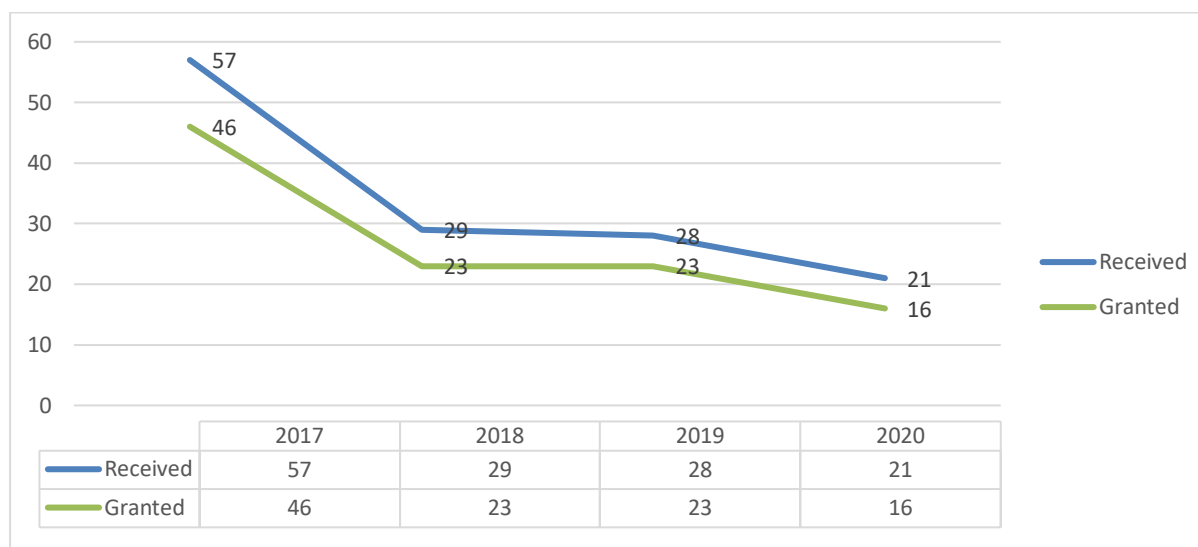
Other indicators, which were mentioned, apart from the ones mentioned in the CIR, include checking the number of SIM cards bought by a customer and informing the customer accordingly.

Nearly no provider levied surcharges based on other objective indicators (only 1%).

3.2. Application of derogation mechanism

By way of derogation from offering roaming at domestic prices, roaming tariffs may include surcharges based on application of a provider and authorised by the NRA in order to ensure the sustainability of roaming provider's domestic charging model.

Figure 14: Derogation -applications received by NRAs?



As shown in the graph above the total number of applications received by NRAs is decreasing since RLAH came into force. In this context a share of 6 % of the responding roaming providers stated that in the period of consideration of this report they made use of the derogation mechanism referred to in Article 6c of the Roaming Regulation. Half of these

operators levied surcharges on all roaming tariff plans and the other half applied surcharges for certain tariffs only.

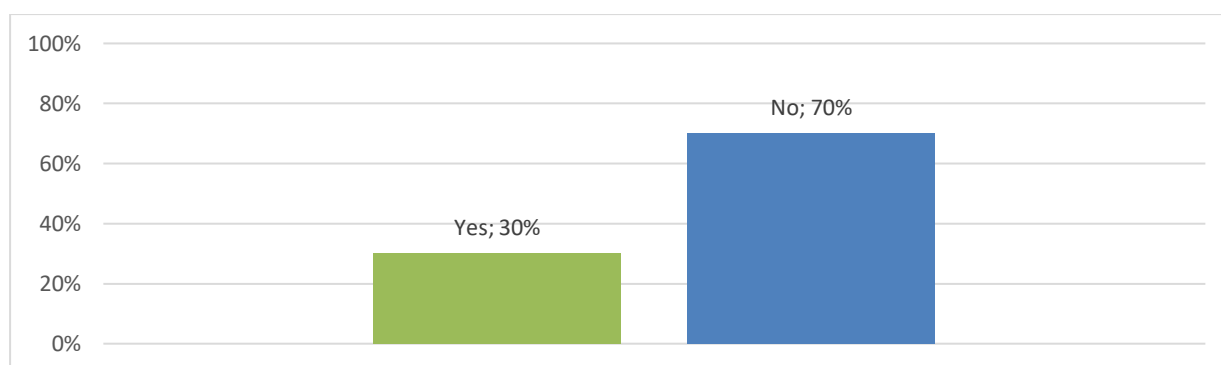
It is worth mentioning that while NRAs stated that they have granted 16 applications only eight⁴ roaming providers answered that they make use of the derogation mechanism. The difference of eight may have several reasons, e.g. not all roaming providers took part in the survey or surcharges have been approved but not yet applied.

3.3. Alternative tariff plans

Pursuant to Article 6e (3) of the 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 and 6c and Article 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).

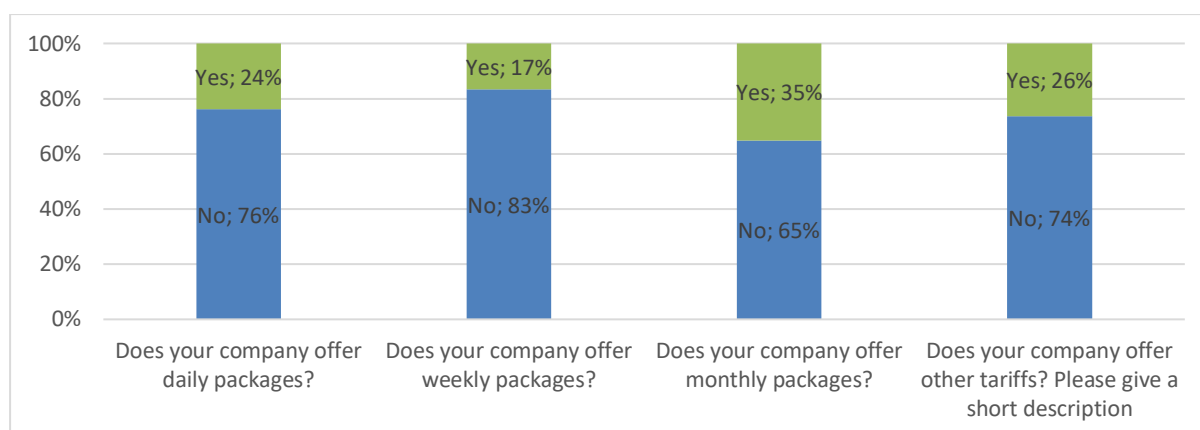
Figure 15: Structure of alternative roaming – do you offer any alternative tariffs in line with Article 6e (3)?



According to the responding roaming providers nearly one third make use of the opportunity to offer alternative tariff plans in parallel to the provision of RLAH plans. On the other hand, 70 % of the respondents stated that they do not offer alternative tariff plans according to Article 6e (3) of the Roaming Regulation.

Of all responding operators, which offer alternative roaming tariffs, 24 % of the operators offer such tariffs in the form of daily packages, 17 % in the form of weekly packages and 35 % in the form of monthly packages.

⁴ 1 MNO, 5 Full MVNOs and 2 Light MVNO/Resellers

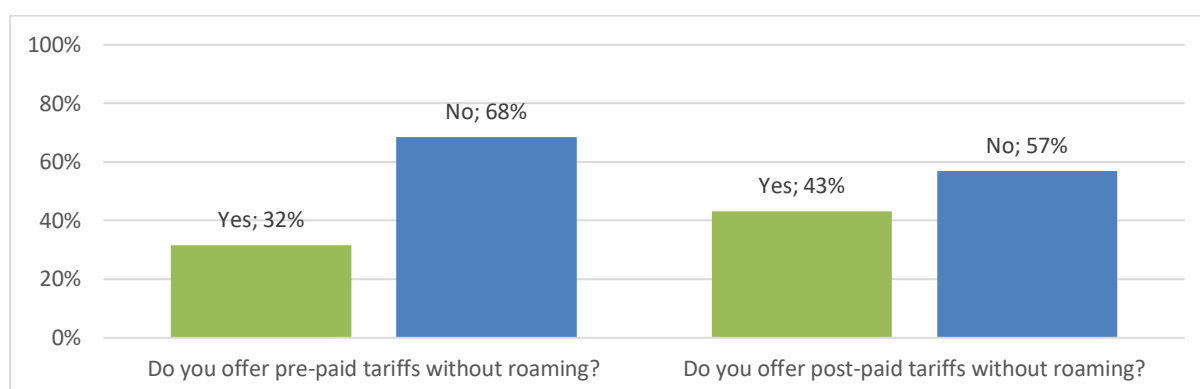
Figure 16: Structure of alternative roaming tariffs - What kind of packages does your company offer?

According to a few of the respondents, other alternative tariffs are tailor made for individual solutions and business customers.

3.4. Tariffs without roaming

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

As far as tariffs without roaming option are concerned, 32 % of the responding roaming providers said that they offer such tariffs as prepaid plans and 43 % said that they offer such tariffs as postpaid plans. Most of the operators stated that tariffs without roaming are mostly dedicated data plans or fixed wireless access products that can be only used on a specific location and are therefore not designed to be moved within neither outside the Member State concerned. According to some of the respondents, both kinds of plans in general include a high data allowance and would lead to high wholesale charges if roaming would be enabled.

Figure 17: Structure of alternative roaming tariffs – what kind of packages does your company offer?

With regard to roaming tariffs, which have been withdrawn after September 2019, only 2 % of the participants in the survey responded positively. According to the more specific

answers, one respondent cited costs as the main reason for withdrawing roaming from particular plans.

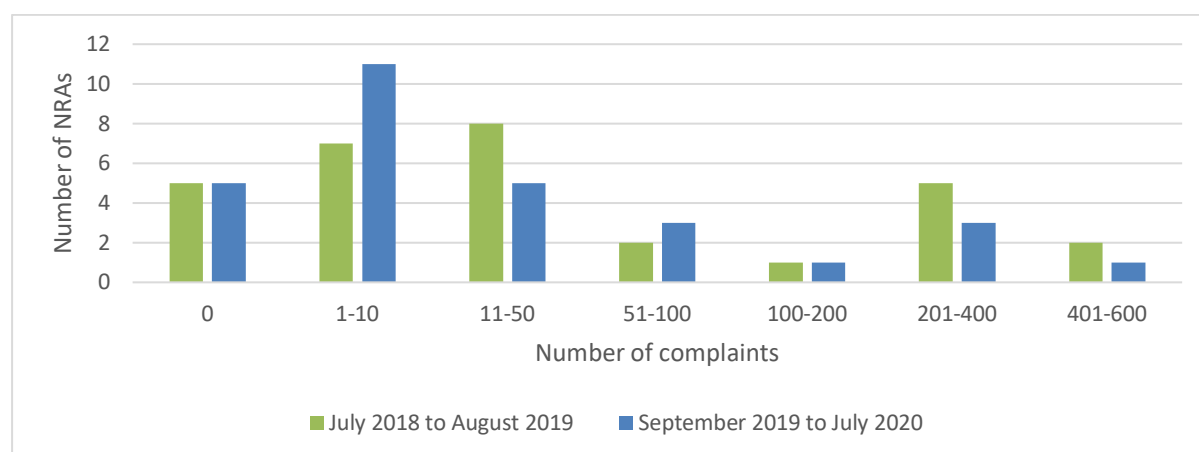
4. Transparency of roaming services

4.1. Complaints on transparency issues received by NRAs

The analysis on complaints is based on 29 responding NRAs, compared to 30 NRAs in the previous period. The questionnaires revealed a slight decrease from the previous period in the number of responding NRAs that had received complaints on transparency. Since August 2019 81 % of the NRAs had received complaints compared to 84 % in the previous period. The total number of complaints registered during this reporting period was about 1,800. This implies a decrease of around 45 % compared to the number of complaints observed in the previous period (3300). In general, the number of complaints reported in BEREC's transparency and comparability reports might not give a completely correct picture of the total number of complaints regarding transparency issues. In some countries, other bodies than the NRA might handle customer complaints⁵. Some NRAs also reported that the system used for registering complaints (in general) makes it difficult to assess the precise amount of complaints on transparency and comparability for roaming.

The figure below shows the NRAs grouped by the number of complaints received.

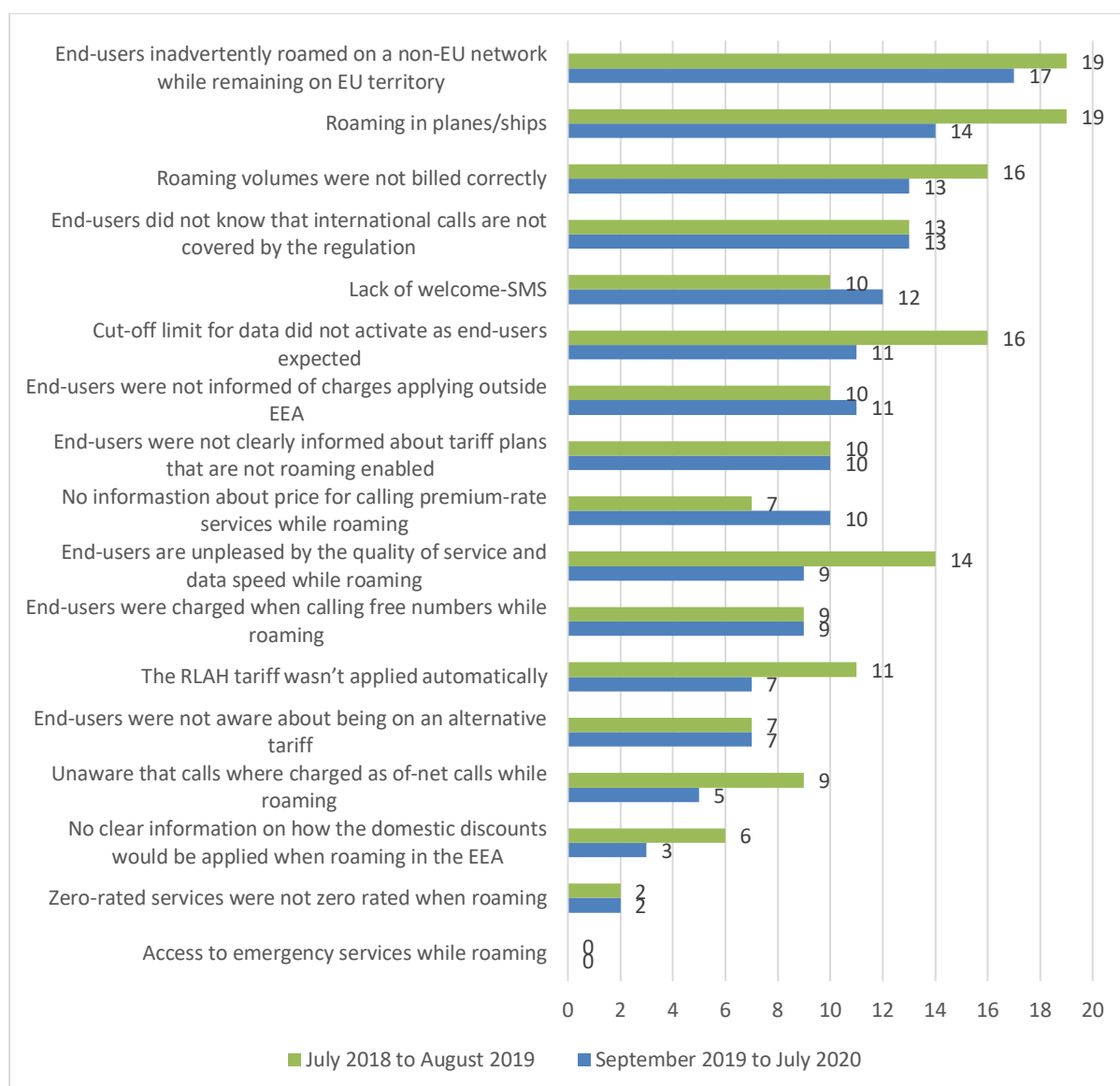
Figure 18: NRAs grouped by number of complaints



The trend during this period is that more NRAs received up to ten complaints than during the previous period and fewer NRAs received over 200 complaints. Among the 25 NRAs that received complaints, 55 % had less than 50 complaints.

The figure below shows how many NRAs received and registered complaints on each of the defined categories. There might be other issues not covered by these predefined categories from the questionnaire. Note also that an NRA may have received more than one complaint in each of the categories.

⁵ The complaints reported by CNMC for this report have been provided by the Ministry of Economic Affairs and Digital Transformation. This Ministry has the competences related to end-users complaints in electronic communications services in Spain.

Figure 19: Number of NRAs that have received complaints on various categories of transparency issues

Inadvertent roaming (end-users inadvertently roamed on a non-EEA network while remaining on EEA territory) caused the largest category of complaints during this period. More than 58 % of the responding NRAs received complaints on this issue. This is, however, a decrease from the previous period. One NRA received more than 100 complaints and another one more than 50 complaints on this issue.

Complaints regarding roaming on board planes and ships are also still a large category of complaints. However, the decrease from the previous period is about 26 %. The total number of complaints in each country regarding transparency issues when end-users are roaming on ships or planes are low in most countries, i.e. less than 15.

Billing of roaming is also a category with a decrease in the number of NRAs that have received complaints. The decrease from last period is 18 %. Still two countries have received more than 50 complaints on this issue, while the number of complaints are low in the other countries.

Five other categories had decreasing number of NRAs that reported complaints. Improvements in the following categories were registered: cut of limits that were not activated as expected, awareness of charges applying outside EEA, quality of service and data speed while roaming, RLAH not applying automatically, unaware that calls were charged as of-net calls while roaming and information about domestic discounts.

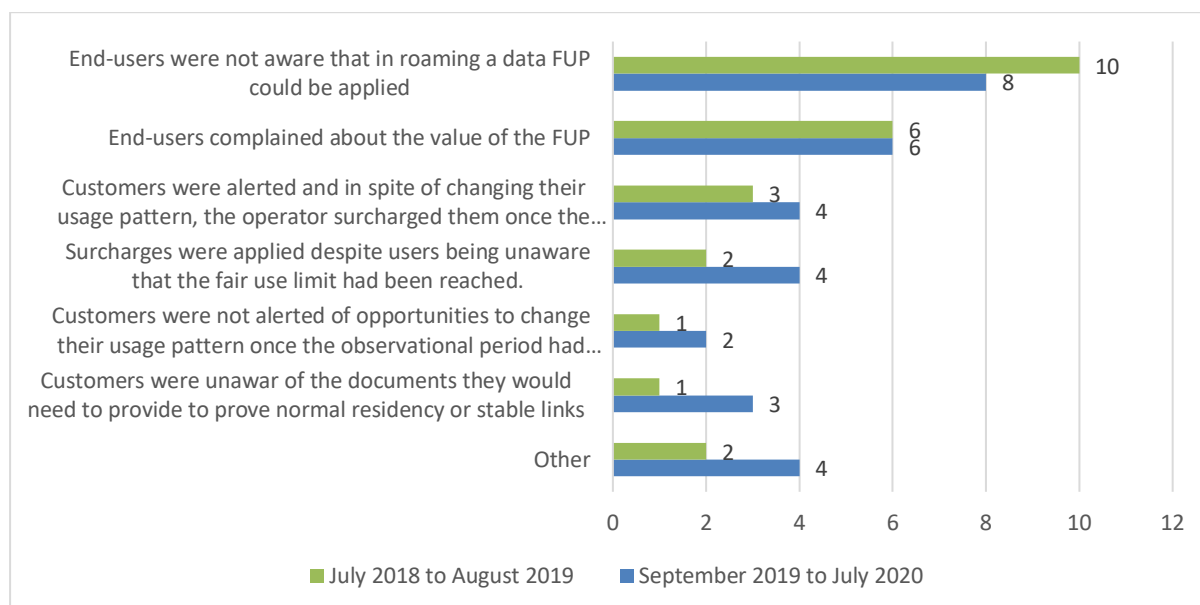
Three categories had a slight increase in the number of NRAs that received complaints. These were the following categories: a lack of welcome SMS, complaints related to end-users that were not clearly informed of charges applying outside EEA and lack of price information when calling premium rate services while roaming.

Five categories were stable. These were awareness of international calls not covered by the regulation, charging when calling free numbers while roaming, awareness of alternative tariffs, information about non-roaming enabled tariffs and complaints related to zero rated services.

BEREC introduced a new category in this period – access to emergency services while roaming. No complaints were reported on this category. BEREC also asked NRAs if they had received complaints from end-users on issues related to the FUP during the period from July 2019 to the end of July 2020. This could be restrictions either imposed on the roaming data volumes or on the control mechanisms for permanent roaming. 12 NRAs received complaints regarding the FUP during this period, which is a 20 % decrease since the previous period.

Figure 21 shows how many NRAs received complaints in each of the defined categories of complaints related to the FUP compared to the previous period.

Figure 20: Number of NRAs that have received complaints on the FUP



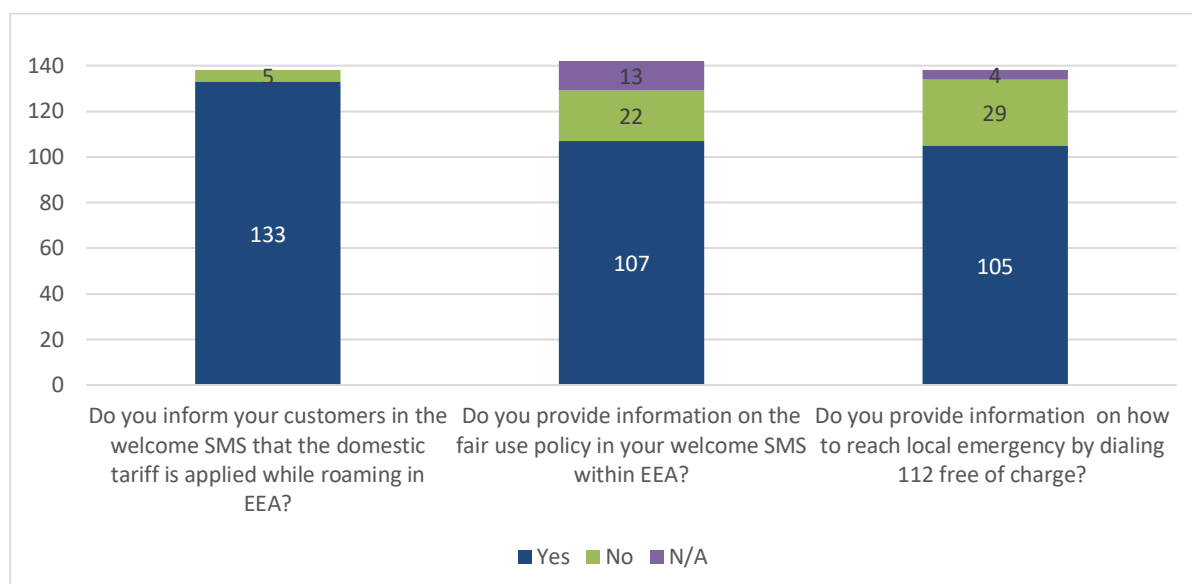
The number of complaints received in each of the categories was in general low (less than 10), except for one NRA which received around 25 complaints from customers unaware that a data FUP could be applied while roaming and another NRA that received around 25

complaints from end-users about the existence of a FUP and the fact that it was not clear how the observational period was applied (category other).

4.2. Information about RLAH in the Welcome SMS

According to Article 15 of the Roaming Regulation, operators are obliged to send an automatic message to their customers while roaming, providing basic personalized information for the roaming customer. This provision is still valid both inside and outside the EEA, although the RLAH principle requires that the domestic retail price is applied while roaming in the EEA. BEREC has investigated if operators provide such pricing information, if they provide information about FUP and how to reach local emergency by dialling 112 free of charge in the Welcome SMS. The figure below shows the results.

Figure 21: Information provided by operators (Welcome SMS)

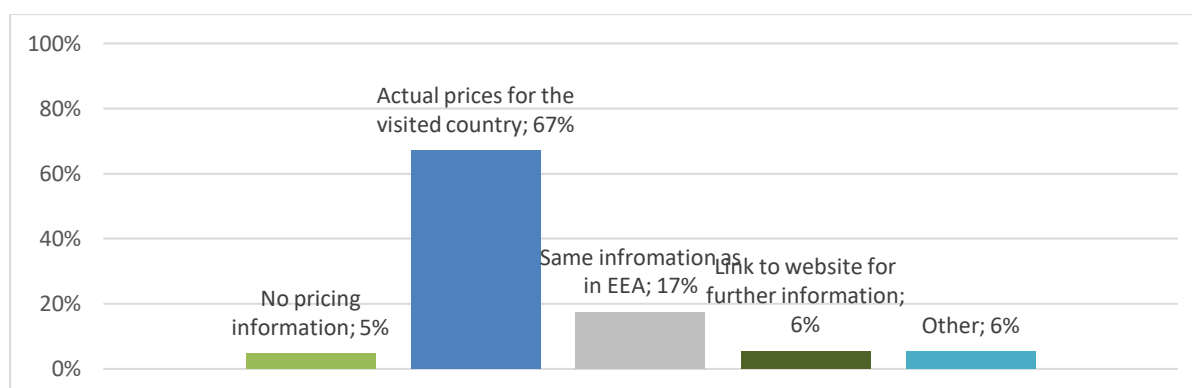


About 96 % (133) of the operators inform their customers via Welcome SMS that the domestic tariff applies while roaming. This is at the same level as in the previous reporting period.

The Welcome SMS should also include information on the FUP the roaming customer is subject to and any surcharges that apply in excess of the FUP. Around 82 % (107) of the operators applying a FUP provide information regarding the FUP in the Welcome SMS. This is an improvement compared to the previous reporting period where the 73 % provided such information.

The Welcome SMS should also include information on how to reach local emergency by dialling 112 free of charge. 78 % (105) of the operators confirm to provide this information in the Welcome SMS.

The operators were also asked what basic pricing information they include in the Welcome SMS when their customers travel outside the EEA.

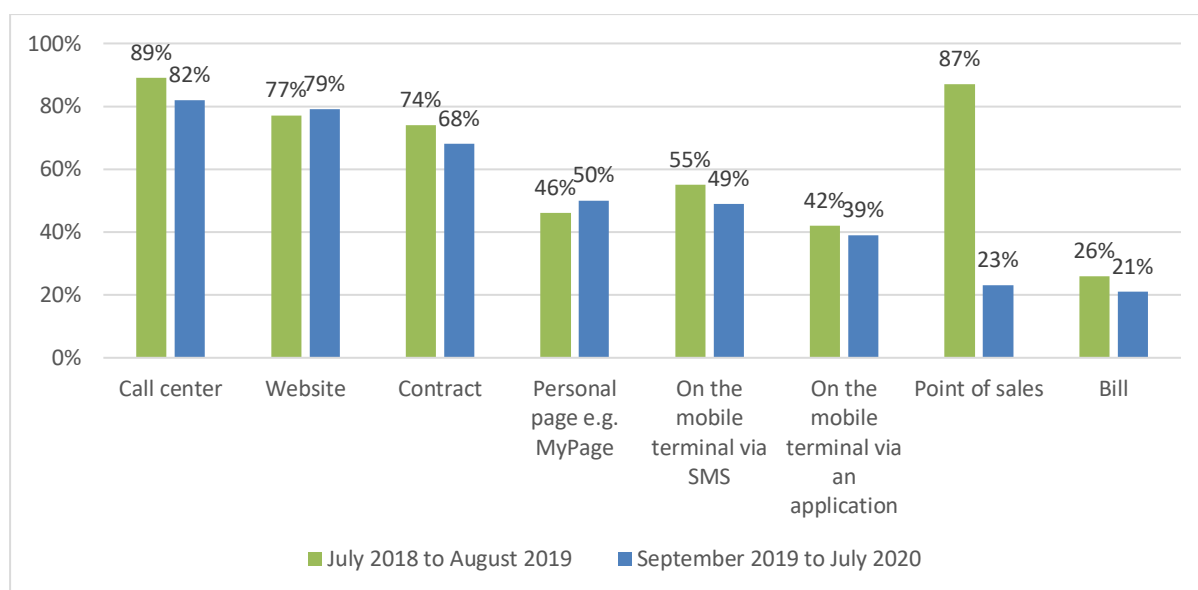
Figure 22: Information provided by operators in Welcome SMS outside EEA

The majority of respondents provide their customers with actual prices for roaming in the visited country (67 %). A group of respondents indicates that they provide the same information as in EEA (17 %), while some give a link to the website (6%). 5 % does not give any pricing information in the Welcome SMS outside EEA.

4.3. Information when providing alternative tariffs

According to Article 6e of the Roaming 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. Such tariffs could involve surcharges for EEA roaming in combination with the inclusion of countries other than the EEA Member States (e.g. Switzerland), a different data roaming allowance, or daily or monthly packages, see Chapter 3. 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, enabling them to make a conscious choice.

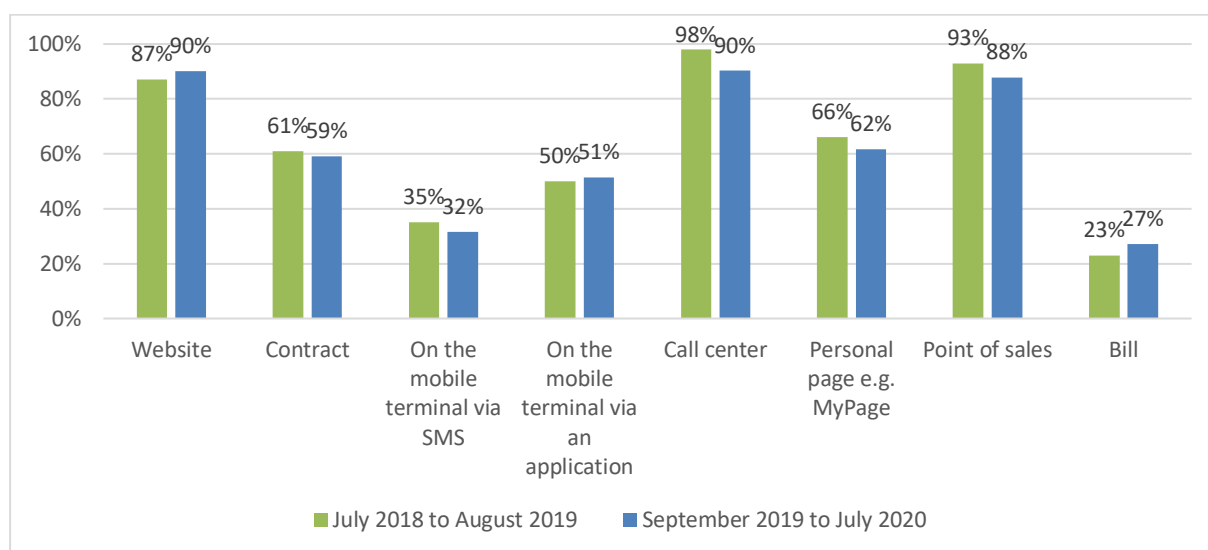
Among the respondents offering alternative tariffs, 95 % of them inform end-users that have opted for such tariffs and about the regulated tariff. Most of these operators (85 %) inform their customers on a yearly basis. A few operators (4) do so every month.

Figure 23: Source of information about regulated tariffs for customers subscribed to an alternative tariff

As presented in the figure above, the two most common ways to inform customers about the regulated tariff are call centers and websites. The figures are relatively stable compared to the previous period, except from point of sales as a source for information. From being one of the most popular sources of information about regulated tariff, this source is significantly reduced. BEREC also notes that web-based information channels (web site and personal page) are the only two categories that have increased in popularity since the last report.

4.4. Information about switching between tariffs

Operators use various methods to provide information on the possibility for end users to switch between tariffs.

Figure 24: Source of information about switching between tariffs

Most of the roaming providers inform their customers by means of call centres, through web sites and/or at the points of sales. Of these three, web site has gained slightly since last report while the two others see a reduction in popularity. For the other categories of providing information, BEREC recognises only minor movements.

The overwhelming majority (about 96 %, up from 90 % in the previous period) of roaming providers offering alternative tariffs stated that they did not apply any activation charge when their customers switch between any of their tariffs. Concerning alternative tariffs limited in time, 87 % (up from 76 %) of the respondents inform their customers actively about charges that apply to roaming services when the time period for the chosen alternative tariff ends. Once again BEREC notes a positive trend and is happy to see that the providers are working on strengthening the transparency for their end users. However, there is still room for some improvement.

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, 89 % (identical as in last report) of the operators inform their customers about the charges that apply to out-of-bundle consumption. Furthermore, 92 % (up from 89 %) of the operators notify their customers when they reach the limit of the bundle, while 86 % – more or less the same as in the previous period – of the respondents said that they also provide additional information for their customers in case a certain percentage of the bundle is used.

Regarding alternative tariff bundles, 89 % (more or less the same as in the previous period) of the operators inform their customers about the tariffs/charges they have to pay for roaming services out-of-bundle. BEREC has hoped for a more positive development for this parameter as in practice, this means that some operators still do not inform their customers when they reach the limit included in the bundle. This may have a negative impact for customers as it could lead to additional charges (e.g. bill shocks) as a result of customers not receiving detailed information about such out-of-bundle charges in advance.

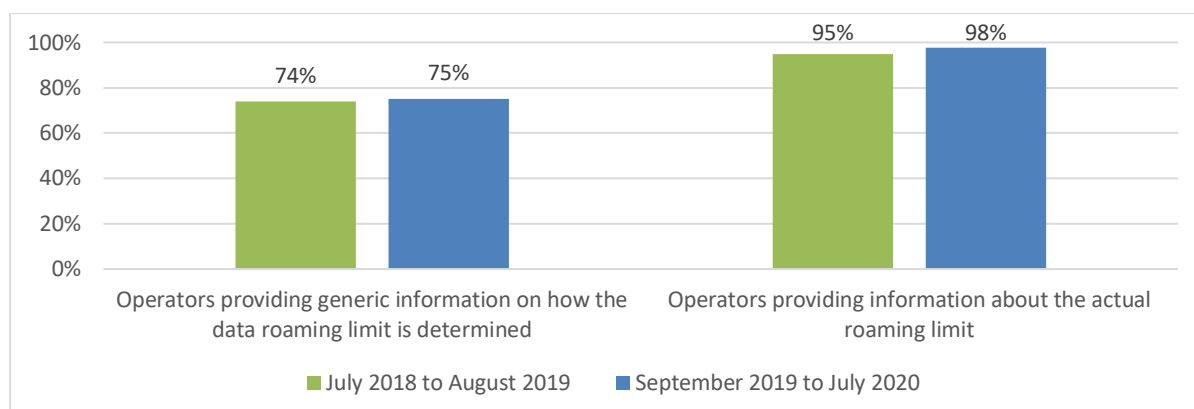
4.5. Providing information within the FUP

Article 4 of the CIR states that roaming providers are allowed to implement a FUP. Where FUPs depend directly on the consumption of regulated roaming services, providing transparent information on volume limits and surcharges to end users is important.

4.5.1. Open-data bundles

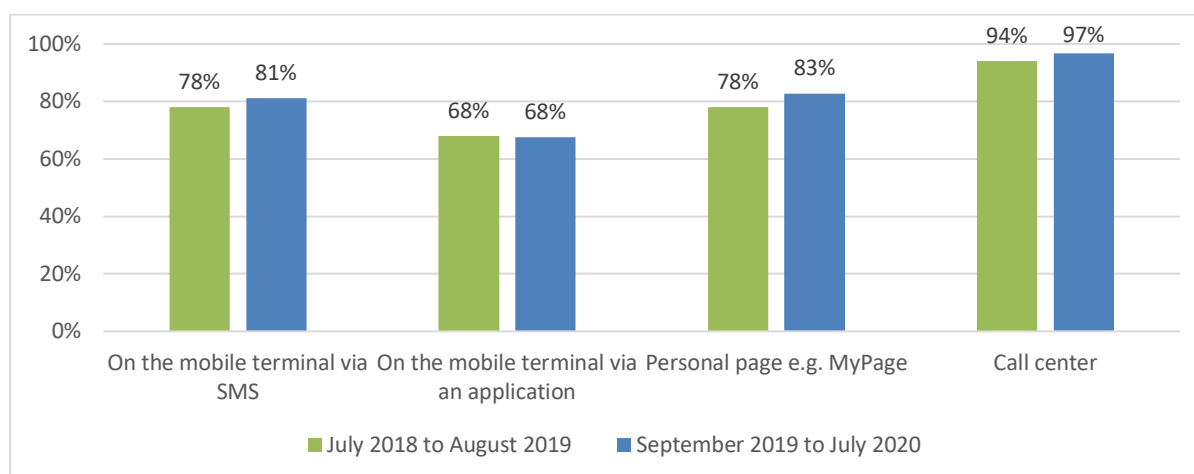
According to the Roaming Regulation, open-data bundles are tariff plans for the provision of one or more mobile retail services which do not limit the volume of mobile data retail services or for which the domestic unit price of mobile retail data services is lower than the regulated maximum wholesale roaming charge. Operators are allowed to limit roaming data consumption at domestic prices for such open-data bundles. After exceeding the fair use roaming allowance, roaming providers are allowed to employ a surcharge for the additional use of the data service. The Roaming 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 25: Information about charges and consumption within a FUP in case roaming volumes are calculated according to the open-data bundle rule



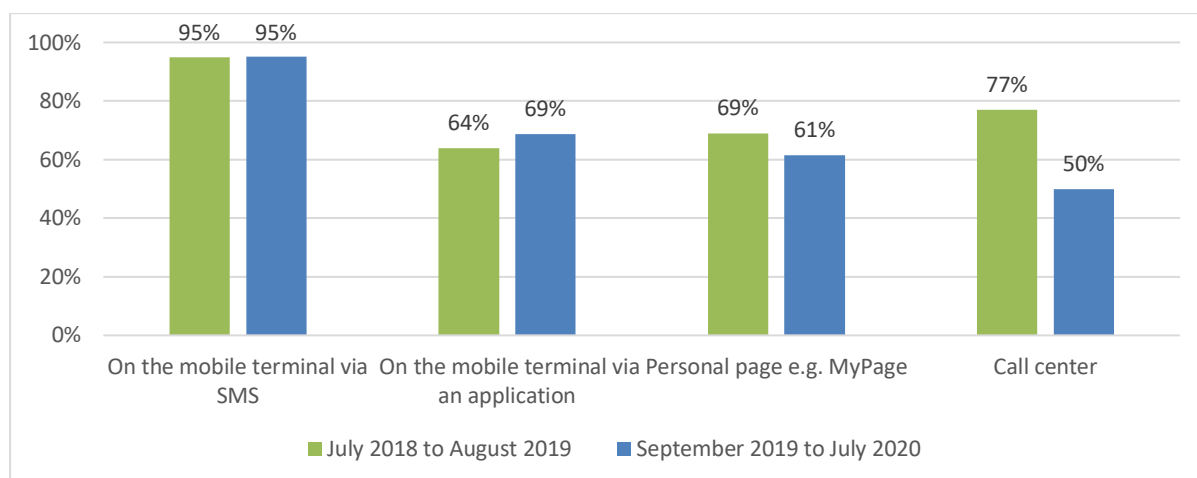
The data above shows that 75 % of the responding roaming providers which apply a FUP according to Article 4 (2) of the CIR inform their customers about how the roaming allowance is calculated. In addition, 98 % of the roaming providers which established a FUP according to the open-data bundle rule provide information for customers about their actual roaming volumes. Both parameters show an increase in percentage points compared to the previous period.

Figure 26: Means used by the (relevant) operators for providing information about available roaming data volumes, when these are calculated according to the open-data bundle rule



As seen, providing information through call center is the information channel that is used by the largest number of respondents. This is followed by the use of web/MyPage and then in third place: on the mobile terminal via SMS.

Figure 27: Operators' means of actively informing end-users when they reach the roaming limits included in the open-data bundle

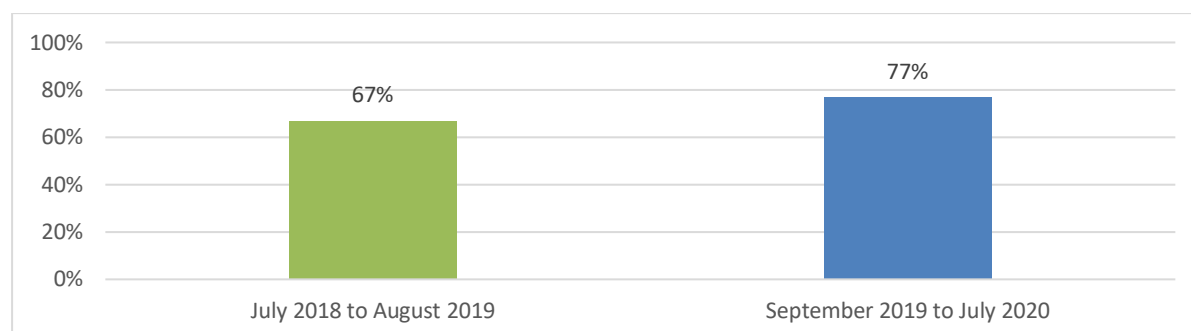


Information collected through the questionnaire reveals that 97 % of the relevant operators inform end-users actively when they reach the roaming limits included in the open-data bundle. For this reporting period BEREC notes that providing information directly to the end-user's mobile terminal, either through SMS or an application, are the now dominant information channels. This is positive as it brings this important information directly to the terminal without end-users having to actively seek this out.

4.5.2. Objective indicators

In addition to the open-data bundle FUP, roaming providers are also allowed to implement a control mechanism over an observation period of at least 4 months. This control mechanism includes two objective indicators, namely 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 must notify the customer of applicable surcharges and allow the customer two weeks to react and change her or his behaviour. If no changes are detected by the operator in these two weeks, the operator may apply surcharges for further use of the observed roaming service. Roaming providers are obliged to provide evidence after the 4-month observation window of the customer's unchanged behaviour.

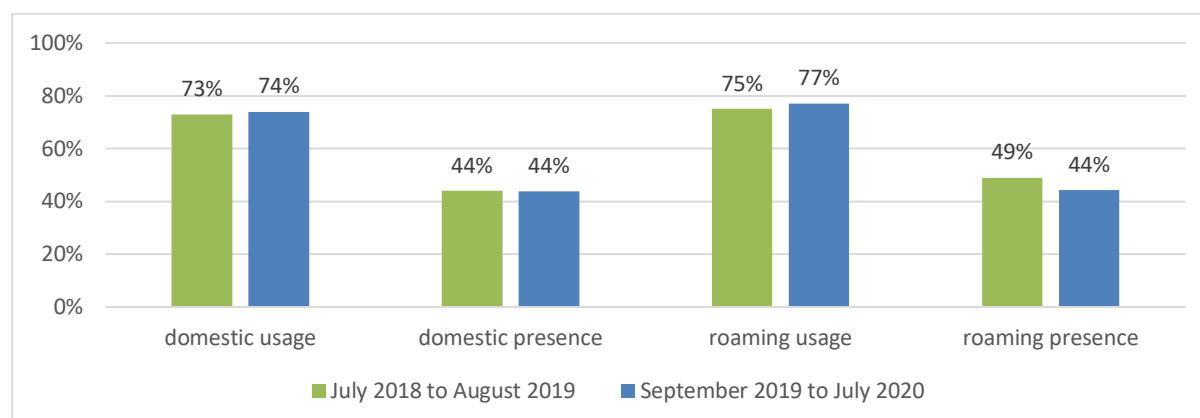
Figure 28: In case control mechanism is applied do you provide information within the observation period?



For the current reporting period, there has been a notable increase in the percentage of operators that provides information to their end users while they are inside an observation period. This is positive as it allows users to be aware of how they match up against the observation window and gives them a chance to eventually change their roaming behaviour before surcharges might set in.

The next figure shows the indicators for which operators give information to their end users about. As in the previous reporting period it is the usage indicators that are most often used to keep customers up to date. Less than half of the relevant responders answered that they give information about their end-users' roaming and/or domestic presence.

Figure 29: Do you provide information within the observation period and if so: for which indicators?



The next figures breaks down which ways operators provide information about the objective indicators:

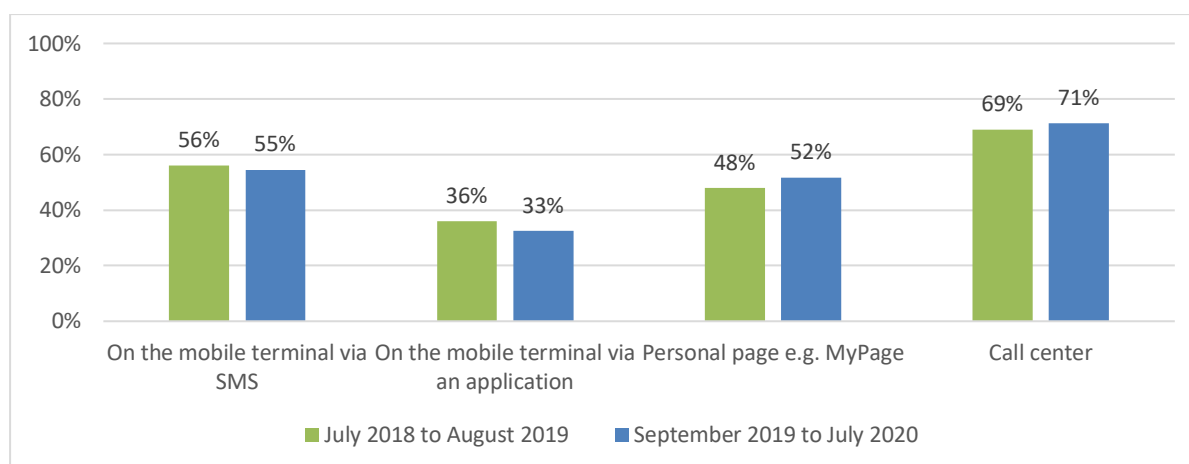
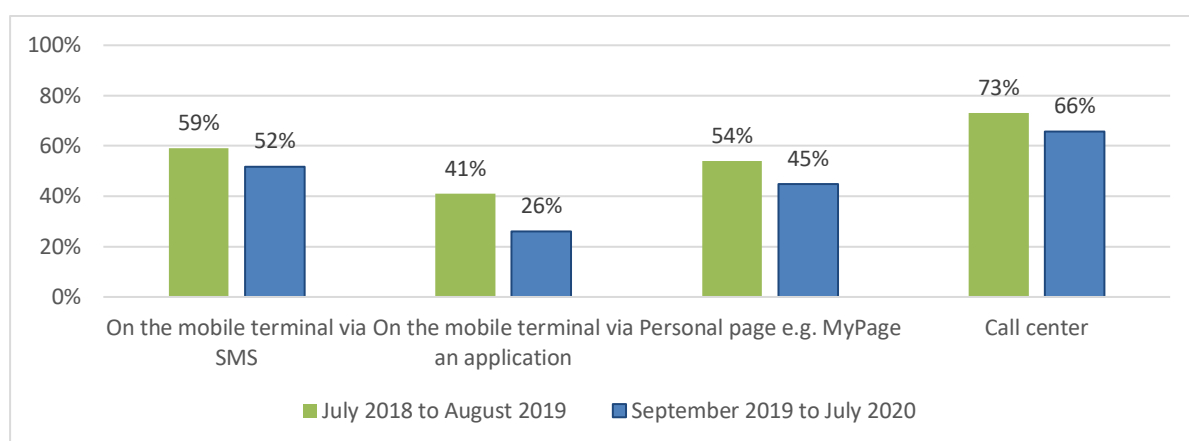
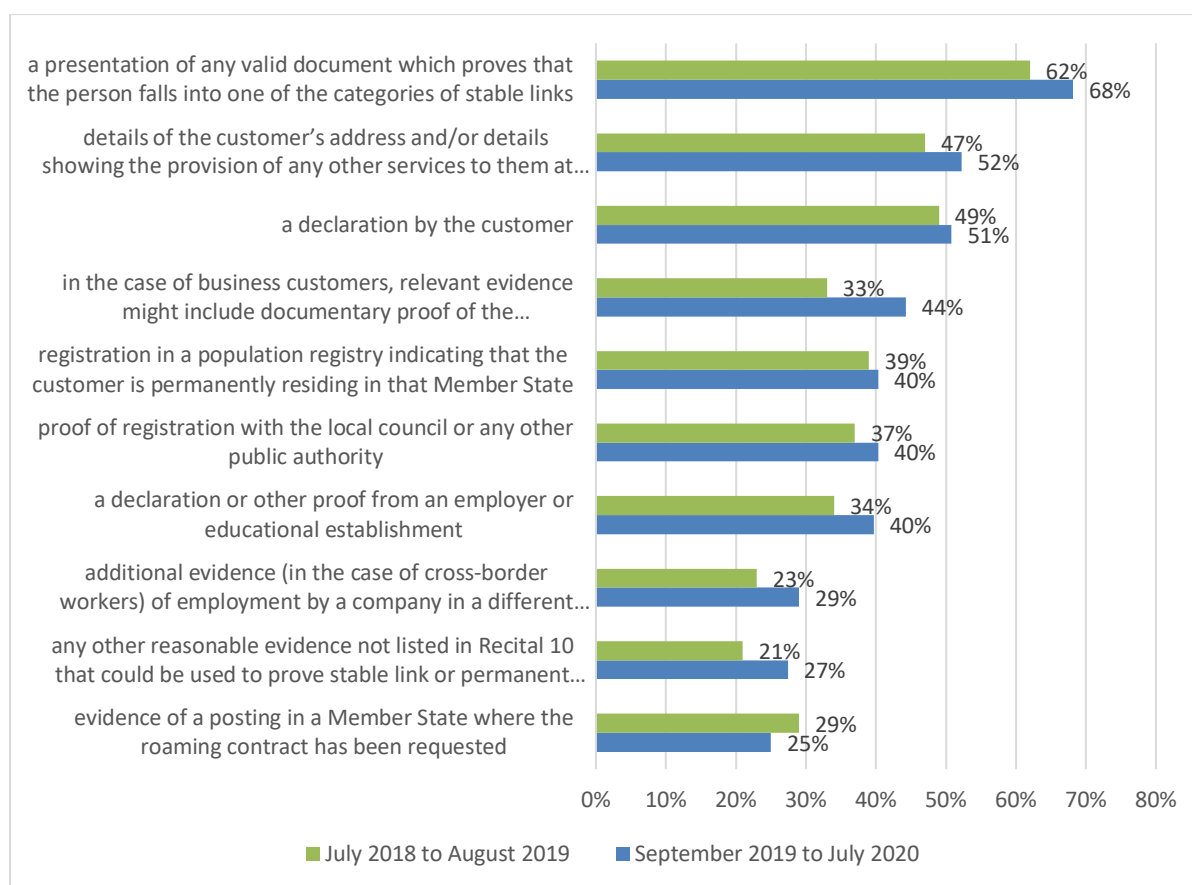
Figure 30: How is such information provided (domestic services)?

Figure 31 reveals that call centers are the most often used way that the respondents provide information on end-users' domestic services. The next most used way is to provide SMS with information directly to the end user's mobile terminal. Movements from the previous reporting period are not very large.

Figure 31: How is such information provided (roaming services)?

For roaming services, the trends are the same and call centers are preferred ahead of SMS. BEREC notes that the changes for this reporting period compared to the previous period, are somewhat larger than what can be observed for the domestic services.

Stable links are a collection of means for the operators to verify if a customer is eligible to enter into a contract that includes (regulated) roaming services. There are numerous ways for an operator to check this and the respondents gave the following answers when asked about what evidence they accept:

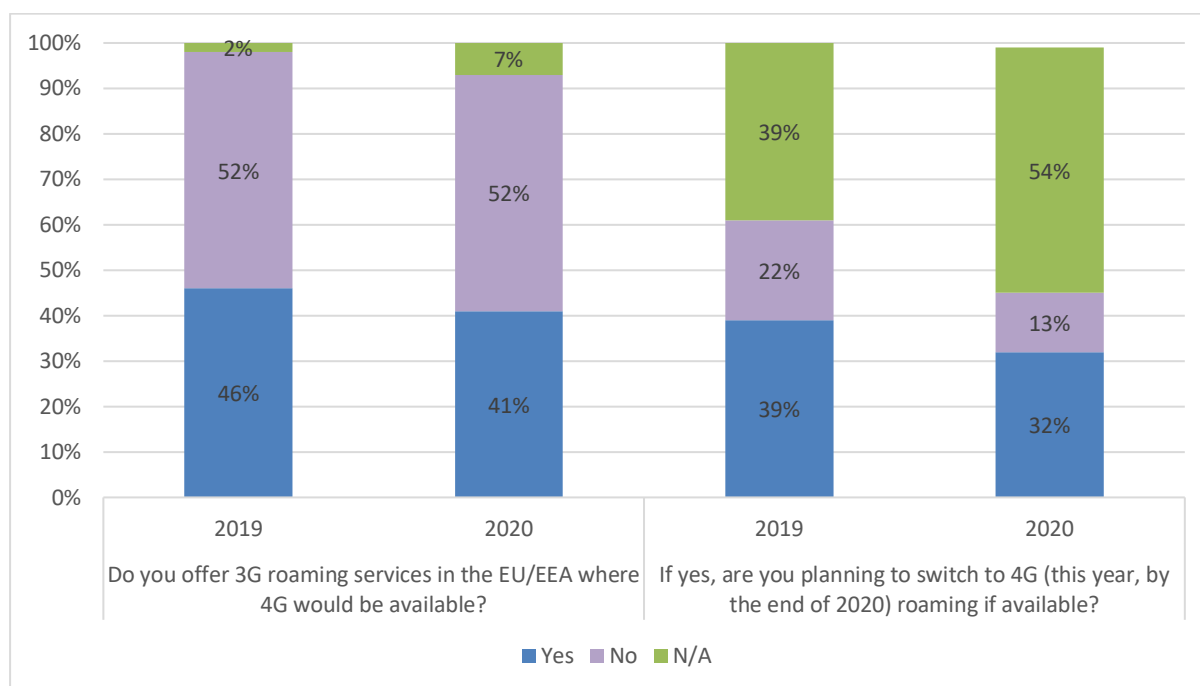
Figure 32: What kind of evidence is requested to assess stable links?

The table speaks for itself and BEREC notes that a larger percentage of respondents request stable links evidence. From those operators, which request evidence on stable links and/or normal evidence, the following evidences are requested: a presentation of any valid document which proves that the person falls into one of the categories of stable links (68 %, up from 62 %), a declaration by the customer (51 %, up from 49 %), details of the customer's address and/or details showing the provision of any other services to them at the given address, e.g. a utility bill (52 %, up from 47 %), registration in a population registry indicating that the customer is permanently residing in that Member State (40 %, up from 39 %), proof of registration with the local council or any other public authority (40 %, up from 37 %), a declaration or other proof from an employer or educational establishment (40 %, up from 34 %), additional evidence (in the case of cross-border workers) of employment by a company in a different country of residence (29 %, up from 23 %), any other reasonable evidence not listed in Recital 10 that could be used to prove stable link or permanent residence, such as a valid property rental agreement (27 %, up from 21 %) in the case of business customers, relevant evidence might include documentary proof of the establishment or activities of the business in the Member State concerned (44 %, up from 33 %), and last: the only category that has a lower percentage compared to last period – evidence of a posting in a Member State where the roaming contract has been requested (25 %, down from 29 %).

4.6. Quality of service in roaming

BEREC was also interested in the network technology that was used for providing roaming services. 41 % of the operators stated⁶ that they offer 3G roaming services in the EU/EEA even where 4G would be available⁷. Last year 46 % of the operators stated the same.

Figure 33: Availability of 3G and 4G roaming services



68 % of the operators that offer 3G services (even if 4G is available) are not planning to provide 4G roaming services by the end of 2020 or did not specify any plans at all to improve their quality. Last year 61 % of the operators stated this⁸.

Currently, operators are implementing 5G technology across Europe. There is, however, a wide diversity amongst Member States in the advance of these implementations⁹. BEREC notes that none of the operators in the EU-countries implemented yet a nation-wide 5G coverage. In some countries, most populated areas are already being covered, and in most other countries implementations have been advanced to only some populated areas. 10 % of the operators answered positively to the question if they offered 5G roaming services.

⁶ The question addressed to operators did not specify that operators replying positively offer 3G across all roaming networks and all Member States. Therefore, it is not clear if those operators responding with yes, apply this restriction to all countries and all networks.

⁷ "The end-user will typically experience much higher data rates with 4G technology than with 3G technology.

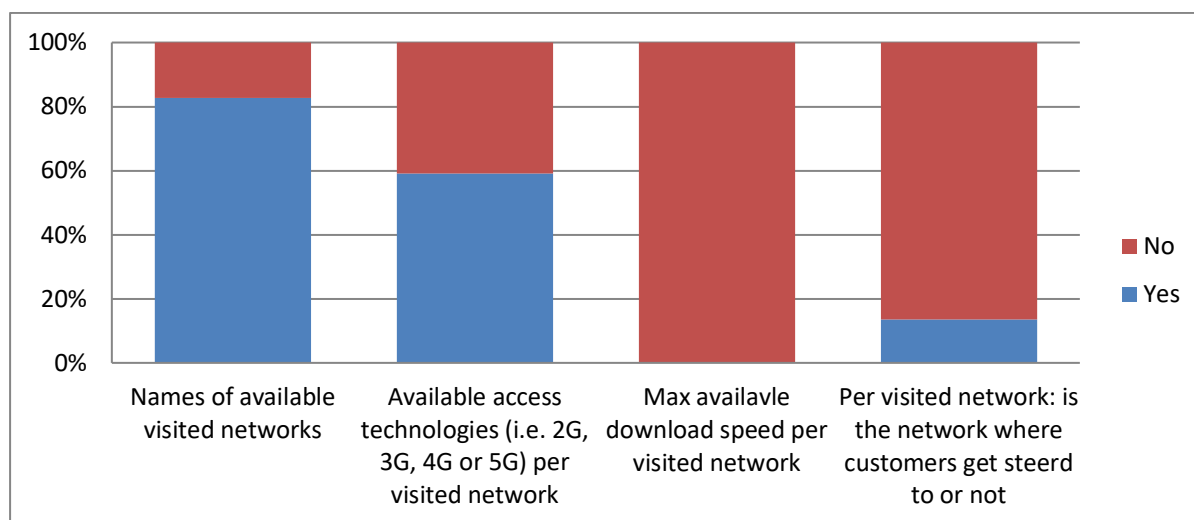
⁸ https://berec.europa.eu/eng/document_register/subject_matter/berec/reports/8901-7th-berec-report-on-transparency-and-comparability-of-international-roaming-tariffs

⁹ http://5gobservatory.eu/wp-content/uploads/2020/07/90013-5G-Observatory-Quarterly-report-8_1507.pdf
<https://www.speedtest.net/ookla-5g-map>

Regarding information for end-users about Quality of Service during intra-EU roaming 85 % of the answering operators did not provide separate itemized information on the quality of service during intra-EU roaming, while only 15 % of operators provided this information. 70 % of the operators that provide information, stated that it is provided per visited network per country, 20 % answered that the information is provided per country and 10 % answered that they provide general information.

Figure 35 shows the type of information that is provided to end-users during intra-EU roaming if the granularity of the information is per visited network.

Figure 34: If the itemized information on QoS during intra-EU roaming is supplied per visited network what kind of information is provided?



The issue about quality of service while roaming was also analysed in the last two BEREC Opinions/Inputs¹⁰ and was identified as an issue to be addressed in any potential update of the Roaming Regulation.

¹⁰ BEREC Opinion on the functioning of the roaming market, as input to the Commission's evaluation BoR (19) 101 13 June 2019 and BEREC input on EC's request for the preparation of the legislative proposal for the new roaming regulations BoR (20) 131 30 June 2020.

5. Comparability of international roaming 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 end-users, domestic services are of prime importance. The abolition of retail roaming surcharges has overturned the premise for comparing retail roaming tariffs: unlike the complex variety of prices and packages for retail roaming available before, roaming consumption within the EEA should now be deducted from the domestic allowance (except for domestic tariffs with charges per unit).

The FUP 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 towards empowering customers to make informed decisions on mobile and roaming offers.

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

BEREC asked providers if they made any tables or tools available on their websites that allow customers to compare alternative roaming tariffs with regulated ones. Among the providers that offered alternative tariffs, 13 % reported that they enabled such solutions.

5.2. Tables and assessment from consumer associations and other organizations

BEREC asked NRAs if consumer associations or any other organisation 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.

16 % of the responding NRAs are aware of such comparison tables or information which is a significant improvement compared to last year (where the number was 4 %). 12 % of the responding NRAs reported that consumer associations or other organisations have published recommendations for end-users in order to help them select the most adequate international roaming tariff. The responding NRAs were not aware of any publicly available report provided by consumer associations or other organisations which compares international roaming tariffs. 4 % of the responding NRAs were aware of an application to help end-users decide which type of tariff to select based on their international roaming consumption patterns.

5.3. Tables on NRAs' websites comparing tariffs

BEREC asked NRAs a set of questions about the range of information available to end-users on their websites which may enable them to compare tariffs.

24 % of the responding NRAs reported that they featured up to date information on their website comparing domestic tariffs including intra-EEA roaming provided by different operators, thereby facilitating a comparison of RLAH tariffs. 14 % of the responding NRAs reported that they were provided up-to-date information comparing alternative roaming tariffs (including tariffs that combine intra-EEA and Rest of World roaming) to facilitate a comparison of RLAH tariffs. Less than half of the responding NRAs granted derogations to apply sustainability surcharges and 14 % of them reported that they provide updated information on their websites comparing tariffs that have a sustainability surcharge. 14 % of the responding NRAs reported that they provide updated information on their websites comparing roaming tariffs for non-EEA-countries.

Before RLAH was implemented in the EU/EEA Member States, providing tables and reports comparing tariffs for international roaming between operators was 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 customers and the previously required separate tables for comparing retail roaming tariffs may no longer be necessary. 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 any surcharges are applied to the tariff. The data collected for this report revealed that only small percentage of NRAs and consumer associations provide customers with such tables. It is also noticeable that the situation has not changed substantially since the publication of the previous report.

5.4. Guidance for customers to estimate data traffic and tools to select a tariff

The major factor determining the price of tariffs offered to customers is the volume of data included in the package. Therefore, it is important that customers can estimate their capacity needs in order to be able to make an informed choice. Any tool estimating future data usage is supposed to help customers choose the most suited tariff.

In order to review the availability of any resources which aids informed decisions making BEREC asked whether 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 given estimated consumption.

34 % of the responding operators confirmed that they provided 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 such as Google Maps or WhatsApp.

15 % of the responding operators confirmed that they provided applications to help consumers to select the most adequate tariff, including intra-EU roaming based on their estimation of consumption.

As the above numbers show only a minority of providers actually have interactive tools where the customers' consumption patterns are the starting point for selecting the most adequate tariff. Most likely, the demand for this type of service is not sufficient to attract operators to introduce them due to the wide availability of consumption history for the customers and also a range of external comparison engines throughout the internet.

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 1 September 2019 to 31 July 2020)		
	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 were not clearly informed about tariff plans that are not roaming enabled		
2.2.4. End-users were not clearly informed that for on-net calls made while roaming in the EEA they would be charged the price of calls to other national networks		
2.2.5. End-users were not clearly informed or were wrongly informed on how the domestic discounts would be applied when roaming in the EEA		
2.2.6. End-users were not aware about being on an alternative tariff		
2.2.7. Lack of welcome-SMS		
2.2.8. Cut-off limit for data did not activate as end-users expected		
2.2.9. End-users did not know that international calls are not covered by the regulation		
2.2.10. End-users were charged when calling free numbers while roaming		
2.2.11. End-users did not know the price for calling premium-rate services/VAS while roaming		
2.2.12. End-users were not informed of charges applying outside EEA		
2.2.13. Roaming in planes/ships		
2.2.14. End-users are displeased by the quality of service and data speed while roaming		
2.2.15. Zero-rated services were not zero rated when roaming, (deducted from the bundle)		
2.2.16. End-users inadvertently roamed on a non-EU network while remaining on EU territory		
2.2.17. Access to emergency services while roaming		
2.2.18. Other complaints, please specify (below)		
	Yes/No	Total number of complaints (if Yes)
2.3. Have you received complaints from end-users on issues related to the FUP?		
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. End-users were not aware that in roaming a data FUP could be applied		
2.4.3. End-users complained about the value of the FUP		
2.4.4. Customers were not alerted of opportunities to change their usage pattern once the observational period had ended		
2.4.5. Customers were alerted and in spite of changing their usage pattern, the operator surcharged them once the observational period had ended		
2.4.6. Surcharges were applied despite users being unaware that the fair use limit had been reached.		
2.4.7. Other? If so, please provide details below:		

3. Information currently available to end-users on the NRA website facilitating comparison of RLAH tariffs			
3.1.	<table border="1"> <thead> <tr> <th>Yes/No</th> </tr> </thead> <tbody> <tr> <td>Is there up to date information on your website comparing domestic tariffs including intra-EEA roaming, provided by different operators?</td> </tr> </tbody> </table>	Yes/No	Is there up to date information on your website comparing domestic tariffs including intra-EEA roaming, provided by different operators?
Yes/No			
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3.2.	<table border="1"> <tbody> <tr> <td>If yes, please provide the link</td> </tr> </tbody> </table>	If yes, please provide the link	
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3.3.	<table border="1"> <thead> <tr> <th>Yes/No</th> </tr> </thead> <tbody> <tr> <td>Is there updated information on your website comparing alternative roaming tariffs (including tariffs that combine intra-EEA and Rest of the World roaming)?</td> </tr> </tbody> </table>	Yes/No	Is there updated information on your website comparing alternative roaming tariffs (including tariffs that combine intra-EEA and Rest of the World roaming)?
Yes/No			
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3.5.	<table border="1"> <thead> <tr> <th>Yes/No, N/A</th> </tr> </thead> <tbody> <tr> <td>Is there updated information on your website comparing tariffs that have a sustainability surcharge? (NA if no operators are granted sustainability surcharge)</td> </tr> </tbody> </table>	Yes/No, N/A	Is there updated information on your website comparing tariffs that have a sustainability surcharge? (NA if no operators are granted sustainability surcharge)
Yes/No, N/A			
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3.7.	<table border="1"> <thead> <tr> <th>Yes/No</th> </tr> </thead> <tbody> <tr> <td>Is there updated information on your website comparing roaming tariffs for non-EEA countries?</td> </tr> </tbody> </table>	Yes/No	Is there updated information on your website comparing roaming tariffs for non-EEA countries?
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3.8.	<table border="1"> <tbody> <tr> <td>If yes, please provide the link</td> </tr> </tbody> </table>	If yes, please provide the link	
If yes, please provide the link			

4. Information available to end-users provided by consumer associations or other organizations facilitating the comparison of tariffs (made public from 1 September 2019 to 31 July 2020)													
	<table border="1"> <thead> <tr> <th>Yes/No</th> <th>If yes, please provide the link</th> </tr> </thead> <tbody> <tr> <td colspan="2">Have consumer associations or any other organization provided:</td> </tr> <tr> <td>4.1.</td> <td>tables or any other information comparing tariffs for international roaming from different operators?</td> </tr> <tr> <td>4.2.</td> <td>any publicly available report which compares international roaming tariffs?</td> </tr> <tr> <td>4.3.</td> <td>any set of recommendations for end-users in order to help them select the most adequate international roaming tariff?</td> </tr> <tr> <td>4.4.</td> <td>an application to decide which type of tariff to select based on an estimation of their consumption for international roaming?</td> </tr> </tbody> </table>	Yes/No	If yes, please provide the link	Have consumer associations or any other organization provided:		4.1.	tables or any other information comparing tariffs for international roaming from different operators?	4.2.	any publicly available report which compares international roaming tariffs?	4.3.	any set of recommendations for end-users in order to help them select the most adequate international roaming tariff?	4.4.	an application to decide which type of tariff to select based on an estimation of their consumption for international roaming?
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4.4.	an application to decide which type of tariff to select based on an estimation of their consumption for international roaming?												

5. Information on applications for sustainability surcharges			
		From 1/09/2019 to 31/07/2020	
5.1.	How many applications have you received?		
5.2.	How many applications were granted?		
	For each application (from 1/09/2019 to 31/07/2020), please inform about:	Application granted #1	Application granted #2
			Application granted #N (include additional columns for each application granted)
5.2.1.	Date of application		
5.2.2.	Date of authorisation of the derogation		
5.2.3.	Kind of operator (MNO, Full MVNO, Light MVNO)		
5.2.4.	Domestic market share		
5.2.5.	End-user segment (consumer, business or both segments)		
5.2.6.	Level of the surcharge authorized for voice (outgoing)		
5.2.7.	Level of the surcharge authorized for voice (incoming)		
5.2.8.	Level of the surcharge authorized for SMS (outgoing)		
5.2.9.	Level of the surcharge authorized for data (MB)		
5.2.10.	Please provide any relevant information about the level of the surcharges		
5.2.11.	Are the surcharges applied for all tariffs?		
5.2.12.	If no, please point out how surcharges are applied		
5.2.13.	Please provide further details in other options		
		From 1/09/2019 to 31/07/2020	
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		
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					
Country					
Type of provider (mark with a cross in the corresponding cell)			MNO		
			Full MVNO		
			Light MVNO/Reseller		
All questions should be answered based on the current situation.					
2. Structure of tariffs for international roaming (intra-EU)					
2.1. Quality of retail service					
2.1.1.	Do you offer 3G roaming services in the EU/EEA where 4G would be available?				
	If yes, are you planning to move soon (i.e. within this year (by the end of 2020) to 4G roaming services wherever 4G is available in the EU/EEA?				
2.1.2.	Do you offer 5G roaming services?				
2.2 Fair Use Policy					
2.2.1.	Does your company offer tariff plans applying a FUP according to the CIR?				
2.2.2.	Does your company apply stable link criterion according Art. 4 (1) CIR ?				
2.2.3.	If yes, for which kind of tariff plans?				
2.2.4.	Has your company levied surcharges due to Art. 4 (1) CIR?				
a)	for voice				
b)	for SMS				
c)	for data				
2.2.5.	Does your company apply open data bundle FUP according Article 4 (2) CIR?				
2.2.6.	Is the data roaming limit calculated according to the calculation laid down in the CIR				
2.2.7.	If the limit is different to the calculation according to Art. 4 (2) CIR please specify:				
2.2.8.	Has your company levied surcharges for data roaming services due to Art. 4 (2) CIR?				
2.2.9.	Does your company apply a data roaming limit for pre pay offers according to Art. 4 (3) CIR?				
2.2.10.	Has your company levied surcharges for data roaming services due to Art. 4 (3) CIR?				
2.2.11.	Does your company apply a control mechanism / objective indicators according Article 4 (4) CIR?				
2.2.12.	For which kind of tariff plans?				
2.2.13.	How long is the observation window?				
2.2.14.	Which roaming services does your company observe?				
a)	Voice				
b)	SMS				
c)	data				
2.2.15.	Has your company levied surcharges for roaming services due to Art. 4 (4) CIR?				
a)	for voice				
b)	for SMS				
c)	for data				
2.2.16.	Does your company apply other objective indicators (eg. Long inactivity and/or subscription and sequential use of multiple SIM cards)?				
2.2.17.	If yes, please specify				
2.2.18.	Has your company levied surcharges for roaming services due to other objective indicators?				
2.3 Derogation					
2.3.1.	Does your company make use of the derogation you have been granted?				
2.3.2.	If yes, does your company apply derogation surcharges to				
2.3.3.	Which roaming services are subject to a surcharge based on derogation?				
a)	voice				
b)	SMS				
c)	data				

2.4 Non-EEA destinations			
2.4.1	Do you include non-EEA destinations in some of your offers?		
2.4.2	a) If yes, list non-EEA destinations included in RLAH tariffs		
2.4.3	b) Please specify in the comment box the approximate share of your customer base covered by RLAH offers including non-EEA countries		
2.5 Structure of alternative roaming tariffs according to Article 6e (3)			
Please see BEREC Guidelines 87-93 for further information			
		Available Yes/No	Comment
2.5.1	Do you offer any alternative tariffs in line with Article 6e (3)?		
2.5.2	In which segment(s) are alternative tariffs offered? (Mostly consumer, mostly business, similarly both segments)		
2.5.3	Does your company offer daily packages?		
2.5.4	Does your company offer weekly packages?		
2.5.5	Does your company offer monthly packages?		
2.5.6	Does your company offer other tariffs? Please give a short description		
2.5.7	In alternative offers, do you include non-EEA destinations at a reduced rate (or with no surcharge) while a roaming surcharge is applied in the EU/EEA?		
2.5.8	If yes, please list those destinations		
2.5.9	Other types of alternative tariffs, please give a short description		
2.6 Tariffs without roaming			
		Available Yes/No	Comment
2.6.1	Do you offer pre-paid tariffs without roaming?		
2.6.2	Do you offer post-paid tariffs without roaming?		
2.6.3	If yes, please describe below what are these offers (e.g. bundles, data-only, low/medium/high-end tariff plans, etc.) and why roaming is not provided		
		Available Yes/No	Comment
2.6.4	Were there any tariff plans from which roaming was withdrawn after September 1st 2019?		
2.6.5	If yes, please describe the reason for withdrawing roaming services from a tariff.		
3. Information provided by operators			
3.0	When do you notify the application of a fair use policy to your NRA?		
3.1 Welcome SMS			
3.1.1	Do you inform your customers in the welcome SMS that the domestic tariff is applied while roaming in EEA?		
3.1.2	Do you provide information on the fair use policy in your welcome SMS within EEA?		
3.1.3	Do you provide information on how to reach local emergency by dialing 112 free of charge?		
3.1.4	What basic pricing information do you include in welcome SMS outside EEA?		
3.2 Alternative tariffs			
		Alternative tariffs and regulated tariffs (only reply yes/no to these questions if your answer to 2.5.1 is yes)	Yes/No, N/A
3.2.1	Do you inform end-users that have opted for alternative tariffs about the regulated tariff? (N/A if you don't offer alternative tariffs)		
3.2.2	If yes, how do you inform them:		Yes/No
a)	Website		
b)	Contract		
c)	On the mobile terminal via SMS		
d)	On the mobile terminal via an application		
e)	Call center		
f)	Personal page e.g. MyPage		
g)	Point of sales		
h)	Bill		
i)	Other (comment box below)		
		Please indicate period	
3.2.3	If yes, how often do you remind end-users with alternative tariffs about the regulated tariff?		
		If other period indicated, use comment box below	
		Alternative tariffs (only reply yes/no to these questions if your answer to 2.5.1 is yes)	Yes/No, N/A
3.2.4	Are there any activation charges applied when switching between alternative tariffs?		
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 below:		
3.3 Switching between tariffs (only reply yes/no to these questions if your answer to 2.5.1 is yes)			
		Yes/No	
3.3.1	Is the customer allowed to switch back to RLAH in case they have an alternative tariff according to Article 6e (3)?		
3.3.2	Where do you provide information concerning switching between tariffs?		Yes/No, N/A
a)	Website		
b)	Contract		
c)	On the mobile terminal via SMS		
d)	On the mobile terminal via an application		
e)	Call center		
f)	Personal page e.g. MyPage		
g)	Point of sales		
h)	Bill		
i)	Other (comment box below)		

3.4 Information about charges and consumption within FUP			
In case roaming volumes are calculated according to the open data bundle rule ...		Yes/No, N/A	Comment
3.4.1	Do you provide generic information on how the data roaming limit is determined?		
3.4.2	Do you provide information about the actual roaming limit?		
3.4.3	If yes, how do you provide information on actual available roaming volumes to the end-user?		
	a) On the mobile terminal via SMS		
	b) On the mobile terminal via an application		
	c) Personal page e.g. MyPage		
	d) Call center		
	e) By any other means (please specify below)		
3.4.4	Do you actively inform end-users when they reach the roaming limits included of the open-data bundle?		
3.4.5	If yes, how do you provide information on actual available roaming volumes to the end-user?		
	a) On the mobile terminal via SMS		
	b) On the mobile terminal via an application		
	c) Personal page e.g. MyPage		
	d) Call center		
	e) By any other means (please specify below)		
In case the control mechanism is applied ...		Yes/No	Comment
3.4.6	Do you provide information within the observation period?		
3.4.7	Do you provide information on		
	a) domestic usage		
	b) domestic presence		
	c) roaming usage		
	d) roaming presence		
	How do you provide such information?	Domestic services	Roaming services
	a) On the mobile terminal via SMS		Comment
	b) On the mobile terminal via an application		
	c) Personal page e.g. MyPage		
	d) Call center		
	e) By any other means (please specify below)		
What kind of evidence is requested to assess stable link and/or normal residence?		Yes/No	Comment
3.4.8	Should only be answered if the answer to question 2.1.2 is yes)		
a)	a declaration by the customer		
b)	a presentation of any valid document which proves that the person falls into one of the categories of stable links		
c)	details of the customer's address and/or details showing the provision of any other services to them at their given address (e.g. a utility bill)		
d)	a declaration or other proof from an employer or educational establishment		
e)	evidence of a posting in a Member State where the roaming contract has been requested		
f)	proof of registration with the local council or any other public authority		
g)	registration in a population registry indicating that the customer is permanently residing in that Member State		
h)	additional evidence (in the case of cross-border workers) of employment by a company in a different country of residence		
i)	any other reasonable evidence not listed in Recital 10 that could be used to prove stable link or permanent residence, such as a valid property rental agreement		
j)	in the case of business customers, relevant evidence might include documentary proof of the establishment or activities of the business in the Member State concerned		
k)	other evidence accepted to justify a stable link and/or normal residence; list them 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/tool/application for end-users comparing alternative tariffs with regulated roaming tariffs available on your website? (NA if alternative tariffs are not provided)	Yes/No, N/A
4.1.2	If yes, please, provide the link	
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?	Yes/No
4.2.2	If yes, please, provide the link	
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?	Yes/No
4.3.2	If yes, please, provide the link	
4.4 Information for end-users about Quality of Service during intra-EU roaming		
4.4.1	Do you provide separate itemized information on the quality of service during intra-EU roaming	Yes/No
	If yes, is the information per country or per visited network per country or in general	
	If the information is per network what kind of information is provided:	
	a) Names of available visited networks	
	b) Available access technologies (i.e. 2G, 3G, 4G or 5G) per visited network	
	c) Max available download speed per visited network	
	d) Per visited network: is the network where customers get steered to or not	
	If yes, please provide the URL where this information is available	
5. Any other input that can be considered useful by the provider		