

**Draft BEREC report on best practices to facilitate switching****Public consultation (4 June – 2 July 2010)**

It is with great concern that our company, Hellenic Telecommunications Organization (OTE S.A.), has studied the results of the public consultation and mainly the answers provided by EETT (Hellenic Telecommunications and Post Commission). Within the report it is stated, on one hand that for fixed telephony the highest switching ratio was reported in Greece (26%) and for Internet/BB services the highest churn rates (36%), while on the other hand EETT expressed serious concerns on the efficiency of the switching process as a whole.

In particular OTE notes that EETT's concerns over consumer switching across the relevant communications sectors in Greece (fixed, mobile, internet/BB and bundled services) conveys a very negative position. EETT, in answering the questions related to best practices for facilitating switching, expressed concerns in all levels of the switching process. This can be supported by the fact that EETT was negative in providing answers to all the questions of the questionnaire. For example EETT was the only NRA to report that technical issues were considered as being a major obstacle for switching fixed telephony services. Similarly EETT was one of few NRAs that lack of consumer information was viewed as a major obstacle (three to six out of 28 NRAs depending on the service), while EETT considered irresponsible or dishonest sales to be a major obstacle to switching (two to three out of 28 NRAs depending on the service).

On the other hand according to Consumers' views on switching service providers edited by the European Commission Eurobarometer on January 2009, in Greece, that ranks second after UK with the highest switching rate, difficulties were not so important when it came to switching telecommunication providers (9%-13%, depending on the service), although the switching itself was more difficult. Overall, 38% of respondents using telecom products (of those interested in making a switch) indicated the existence of barriers. Changing mobile telephone services was seen as the easiest: seven out of 10 people found it to be trouble-free (70%). Switching a fixed-line telephone service was considerably more difficult (62% found it easy), but not as complicated as changing one's Internet service provider. Only half of those interested in making such a switch (53%) reported that the switch took place easily and a quarter said the change involved difficulties.

OTE firmly believes that EETT is strongly biased. It is by no means possible that Greece has the highest switching ratio for fixed telephone and for Internet/BB services the highest churn rates on one hand, the Eurobarometer on January 2009 ranks Greece second after UK with the

highest switching rate, consumers provide good grades and EETT rates the whole process as one of the worst in Europe! It is not the case that the process is worry free, or that there have not been problems, in particular regarding irresponsible or dishonest sales, especially from alternative providers where a number of complaints were reported mainly in the past, but it is unjustified to show such a negative picture for Greek providers, especially to the extent that it relates to OTE. To conclude it would be useful, apart from the obvious request for EETT to moderate the unjustified fierce criticism, to include in the study the impact of regulatory interventions and misjudgments as well as constant changes in the switching process initiated by the regulator, that have also had a negative impact in the whole process.

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