

BEREC Report on Transparency and Comparability of International Roaming Tariffs

6 December 2018

Contents

Executive summary and main findings	2
1. Introduction and objectives of the document	5
2. Information collected by BEREC	6
3. Structure of tariffs.....	7
3.1. RLAH with FUP	7
3.2. RLAH with derogations	13
3.3. Structure of alternative roaming tariffs pursuant to Article 6e(3)	13
3.4. Tariffs without roaming.....	15
4. Transparency of roaming services.....	16
4.1. Complaints on transparency issues received by NRAs.....	16
4.2. The extent of sustainability surcharges	19
4.3. Information about RLAH in the welcome SMS	21
4.4. Information about alternative tariffs	21
4.5. Information about switching between tariffs.....	22
4.6. Methods for providing information about consumption.....	24
4.7. Providing information within the fair use policy.....	27
4.7.1. Open-data bundles	27
4.7.2. Objective indicators	29
5. Comparability of international roaming tariffs	33
5.1. Availability of tables for comparing tariffs	33
5.1.1. Tables on the providers' websites comparing tariffs available to customers	33
5.1.2. Tables and assessment from consumer associations and other organizations	33
5.1.3. Tables on NRAs' websites comparing tariffs.....	33
5.1.4. Guidance for customers to estimate data traffic and tools to select a domestic tariff including intra-EEA roaming	34
Annex 1: Questionnaire sent to NRAs	35
Annex 2: Questionnaire sent to operators	38

Executive summary and main findings

This report provides an overview about the transparency and comparability of retail roaming tariffs. In June 2018, 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).

In the questionnaire for NRAs, BEREC focused on information about complaints received by NRAs on transparency issues since July 2017. BEREC included specific questions about those complaints 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, RLAH¹, alternative roaming tariffs and those tariffs where roaming is not offered any longer since RLAH has been introduced. 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, their fair use policies and the applications of those granted surcharges. 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 applicable. According to the Regulation, it should also be possible to switch between roaming tariffs quickly and conveniently.

BEREC has collected information on fair use policies implemented by European roaming providers in their RLAH tariffs after 15 June 2017. Limits on open-data bundles are applied by 74 % of the responding providers. Among the providers that apply a limit on open-data

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.

bundles, more than half of them (51 %) have implemented a data limit for every tariff plan classified as "open-data bundle".

51 % of the roaming providers answering the questionnaire apply the stable link criterion, 57 % of them apply the stable link criterion to every tariff plan.

63 % of the roaming providers have implemented the control mechanism. The control mechanism allows operators to monitor roaming services for a period of four months. 72 % of them implemented the control mechanism for every tariff plan. From those operators who implemented the control mechanism, the majority implemented monthly (51 %) and daily (34 %) observation resolutions.

With regard to the different types of roaming tariffs that are offered by operators, the report shows that 48 % of the responding operators include non-EEA destinations in some of their RLAH offers, these operators mentioned more than 30 non-EEA countries. 70 % of them included Switzerland, followed by Monaco (50 %) and the United States of America (31 %). A similar ratio of operators includes non-EEA destinations in their alternative tariffs (40 %). 32 % of the responding operators offer alternative tariffs which are provided in the form of monthly packages (48%).

Less than half of the roaming providers offer tariffs without roaming (34 %) and 17 % of operators answered that they withdrew roaming services from their tariff plans with the introduction of RLAH.

When BEREC asked whether NRAs had received consumer complaints about transparency, 83 % of the responding NRAs said that they had received complaints on transparency issues. This is an increase compared to the previous period, where 76 % of the responding NRAs reported receiving such complaints. Most complaints were from end-users about inadvertently roaming 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. Such complaints were received by 50 % of the NRAs.

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, 17 NRAs have received applications for sustainability surcharges with a total amount of 57 applications received for the period 15 June 2017 to 14 June 2018. From those, 46 of the applications were granted, and 11 applications were refused. About the level of surcharges granted by NRAs, according to the information BEREC received, most of them reported that they had set surcharges at or below the wholesale caps for voice, SMS and data. For the period 15 June 2018 to 31 August 2018, eight NRAs have received applications for sustainability surcharges with a total amount of 29 applications received. From those, 23 of the applications were granted, and six applications were pending at the end of August 2018.

Of those operators that have been authorised by the NRA to derogate from RLAH, 47 % make use of the derogation. From the operators that use the derogation, the majority (67 %) apply

the roaming surcharge to only some tariff plans and only 43 % apply a surcharge to all roaming services (voice, data, SMS) and the surcharge to the whole roaming consumption.

BEREC asked operators if they informed customers about the fair use policy applied in its “welcome SMS²”. 74 % of the operators that apply a fair use policy 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, at a point of sales or through information on their website.

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 (78 %) followed by a personal page e.g. My Page (76 %) and the use of a specific app available for installation on the terminal (68 %).

Another question dealt with the information provided by operators to end-users about the fair use policy: 67 % of roaming providers who implemented a fair use policy inform their customers about the overall roaming allowance or about how it is calculated. 57 % of the roaming providers state that they provide information within the observation 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 (65 %), 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) (54 %) and a declaration or other proof from an employer or educational establishment (49 %).

The data collected for this report, shows that very few NRAs or consumer associations provide tariff comparisons. 21 % of the responding NRAs reported that they provided updated information on their websites comparing tariffs that have a sustainability surcharge and 14 % of the responding NRAs reported that they provided updated information on their websites comparing roaming tariffs for non-EEA-countries.

Customers should be able to select the most suitable tariff based on their own estimated pattern of consumption. In this regard, 35 % 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.

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.

² The welcome SMS is an SMS sent by roaming providers to their customers when they enter another Member State.

1. Introduction and objectives of the document

Since RLAH is in force (15 June 2017), roaming providers have to inform subscribers about the fair use policies implemented in their tariffs and about the conditions for the 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 lead to better informed customer decisions.

This report takes into account the amendments of Regulation (EU) No 531/2012 on roaming on public mobile communications networks within the Union by the TSM Regulation, (hereafter “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. Furthermore, the switch from or to the regulated roaming tariff (default tariff, since 15 June 2017, the regulated roaming tariff is RLAH) pursuant to Article 6e (3), subparagraph 3 has to be made free of charge within one working day.

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.
- To facilitate 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 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 or derogations, etc.). Operators were asked about the RLAH implementation and the implementation of a fair use policy in their tariffs. In addition 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.

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.

A total of 30 NRAs and 151 mobile providers operating in EEA countries sent their responses to BEREC. 70 % of the responses corresponded to MNOs and 30 % to full MVNOs or light MVNOs and resellers, as shown in Figure 1.

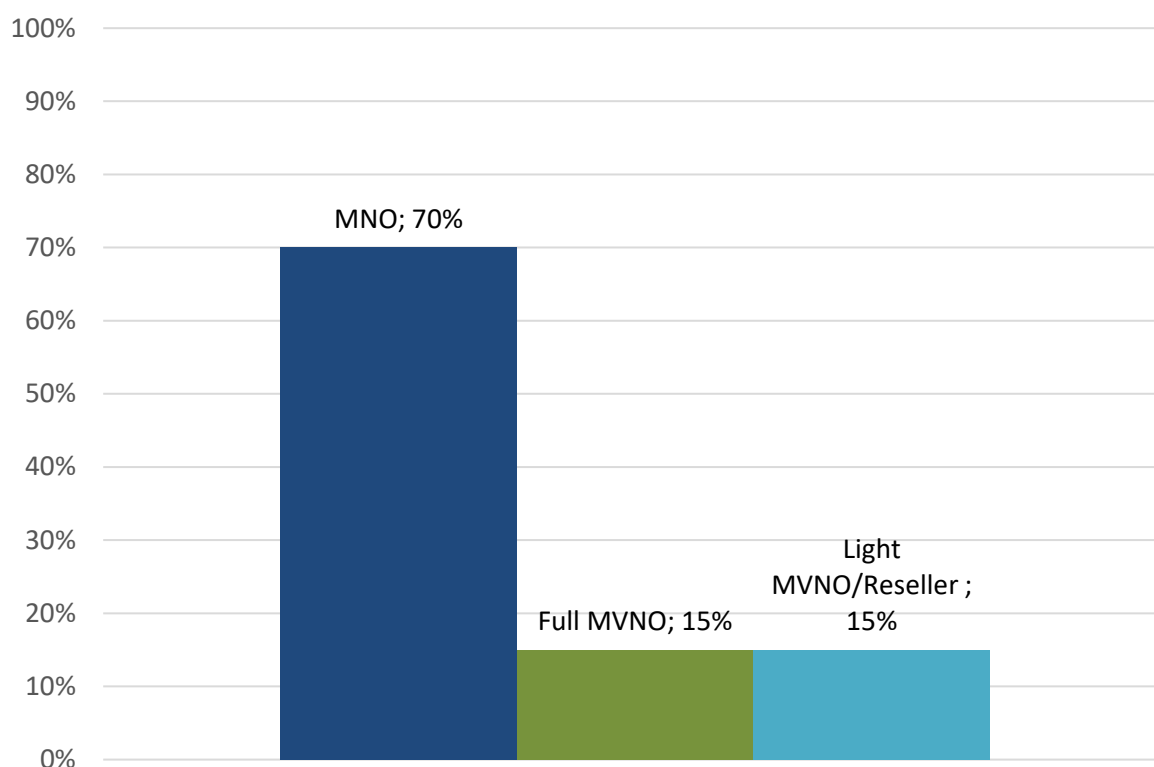


Figure 1: Type of mobile providers responding to the BEREC questionnaire

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 Article 4 (4) CIR. BEREC also collected information on whether non-EEA destinations were included in the regulated tariffs.

From all responding operators, as shown in Figure 2, a majority of 74 % applied an open-bundle data limit. 51 % applied a data limit to every tariff plan classified as “open-data bundle”. 49 % applied a data limit only to some of the tariff plans classified as “open-data bundle”. As shown in Figure 3, when it comes to the question of applying the stable link criterion, 51 % of the responding operators answered that they implemented the stable link criterion.

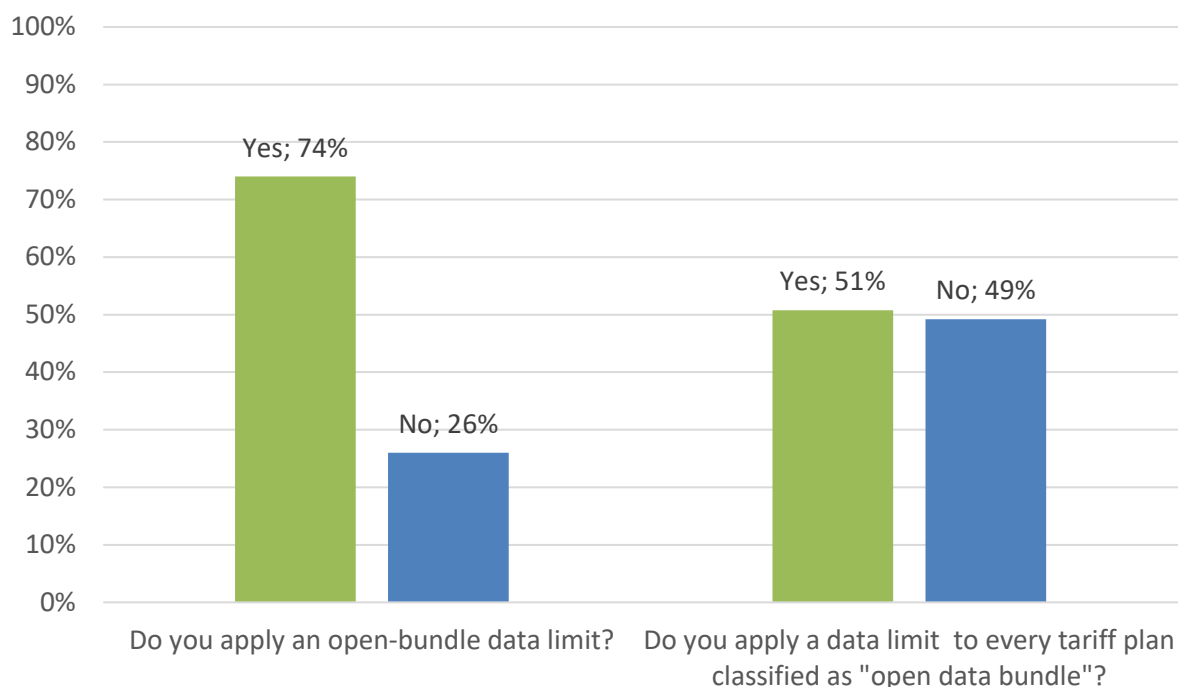


Figure 2: Information on how operators apply an open bundle data limit

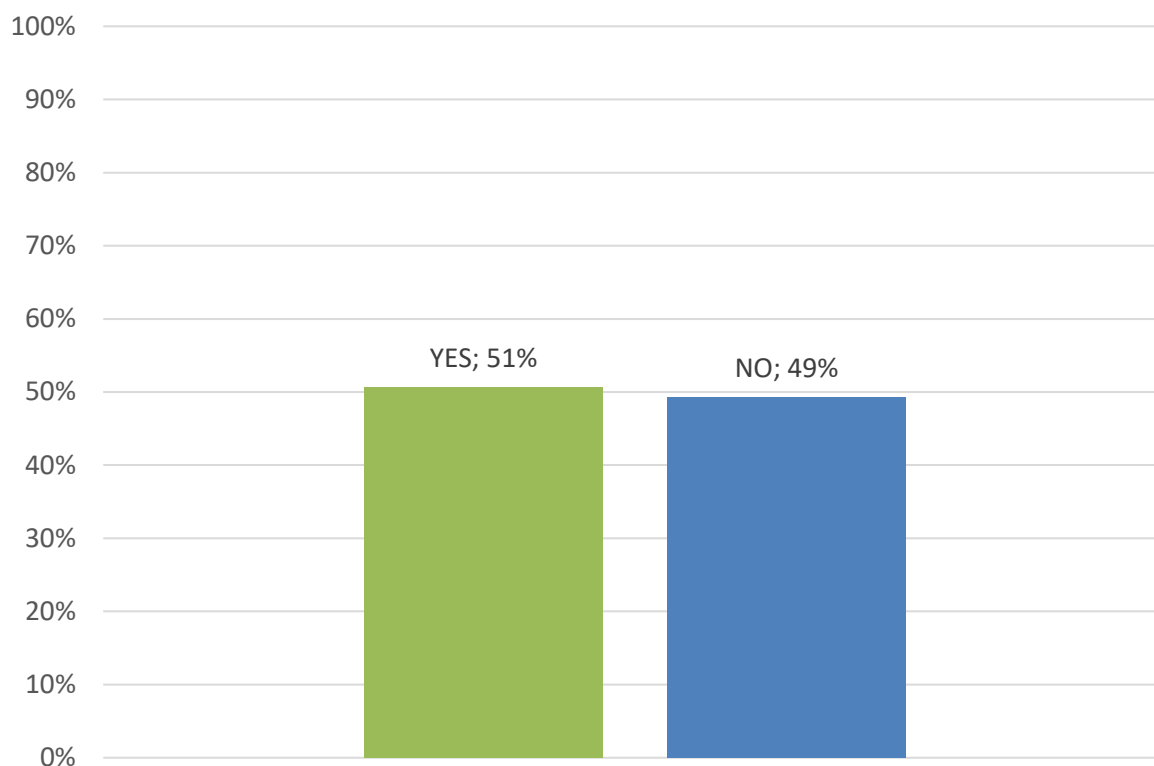


Figure 3: The share of operators that have implemented the stable link criterion

Similarly, although the stable link criterion is used by half of the operators, they do not apply stable links to all tariffs.

Some operators pointed out that they employ stable links, but with the focus on post-paid tariffs only. Operators introduced the stable link criterion mainly in their 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.

It should be pointed out, that from the operators implementing the stable link criterion, 57 % apply the stable link criterion to every tariff plan, as shown in Figure 4.

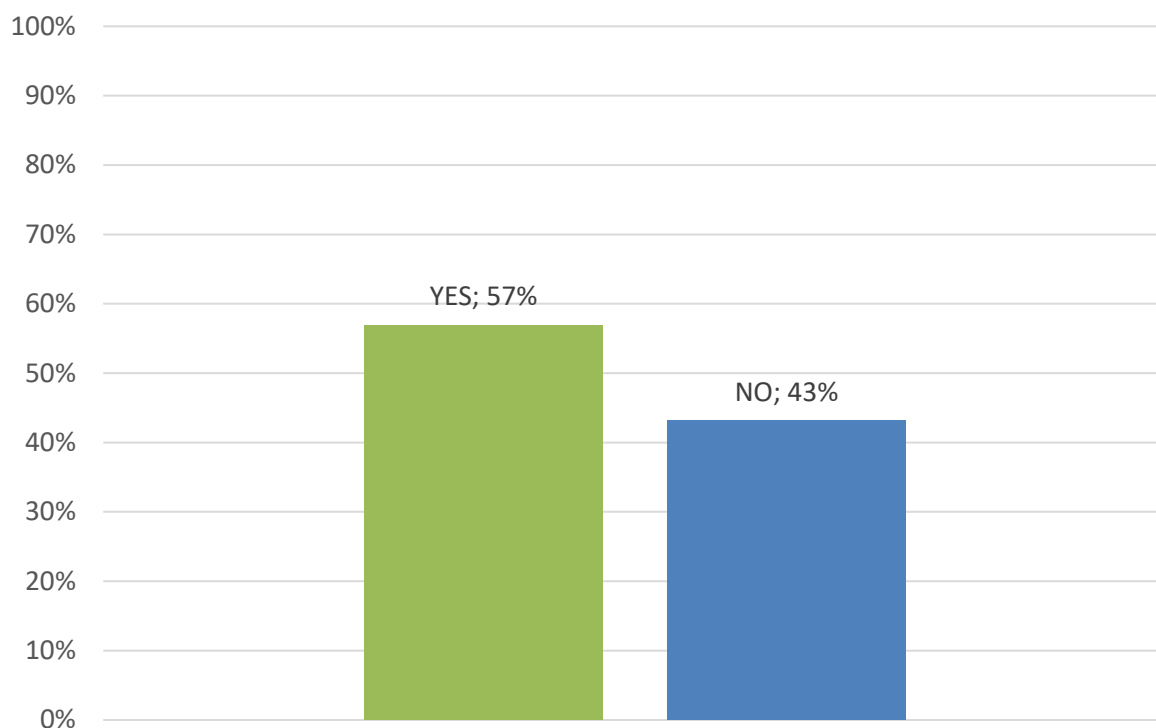


Figure 4: Information on whether the stable link criterion has been applied to every tariff plan

Regarding the implementation of the control mechanism, Figure 5 shows that 63 % of operators have implemented the control mechanism for roaming consumption and presence.

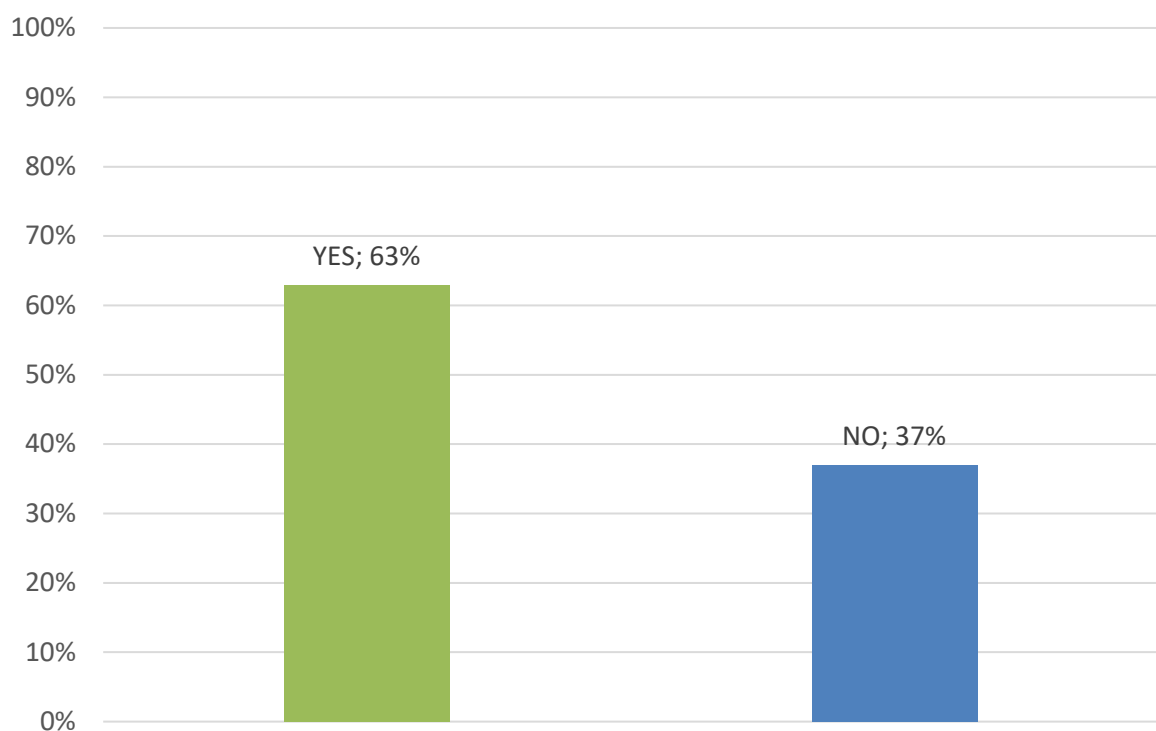


Figure 5: Share of operators that have implemented the control mechanism

Some operators stated that they implemented the control mechanism for roaming consumption and presence 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 duration were stated. Some operators mentioned that the control mechanism implementation entails a relevant technical and practical complexity. Another operator stated the control mechanism was not implemented because of the documentary burdens. Also, for some operators, technical implementation of the control mechanism is still ongoing.

As shown in Figure 6, 72 % of the operators which implemented the control mechanism apply the control mechanism to every tariff plan.

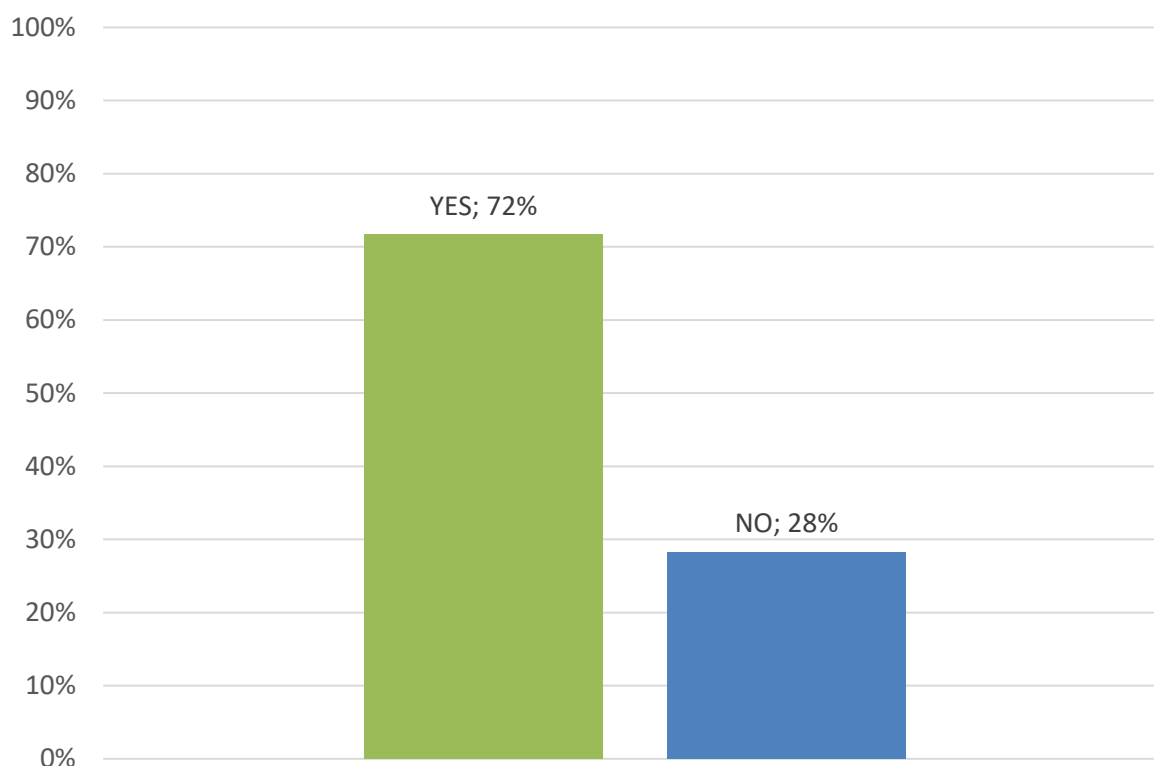


Figure 6: Information on whether operators applied the control mechanism to every tariff plan

From those operators who implemented the control mechanism, 34 % implemented it via a daily observation solution, 3 % via a weekly observation window, 51 % via a monthly observation window and 12 % via some other period (Figure 7).

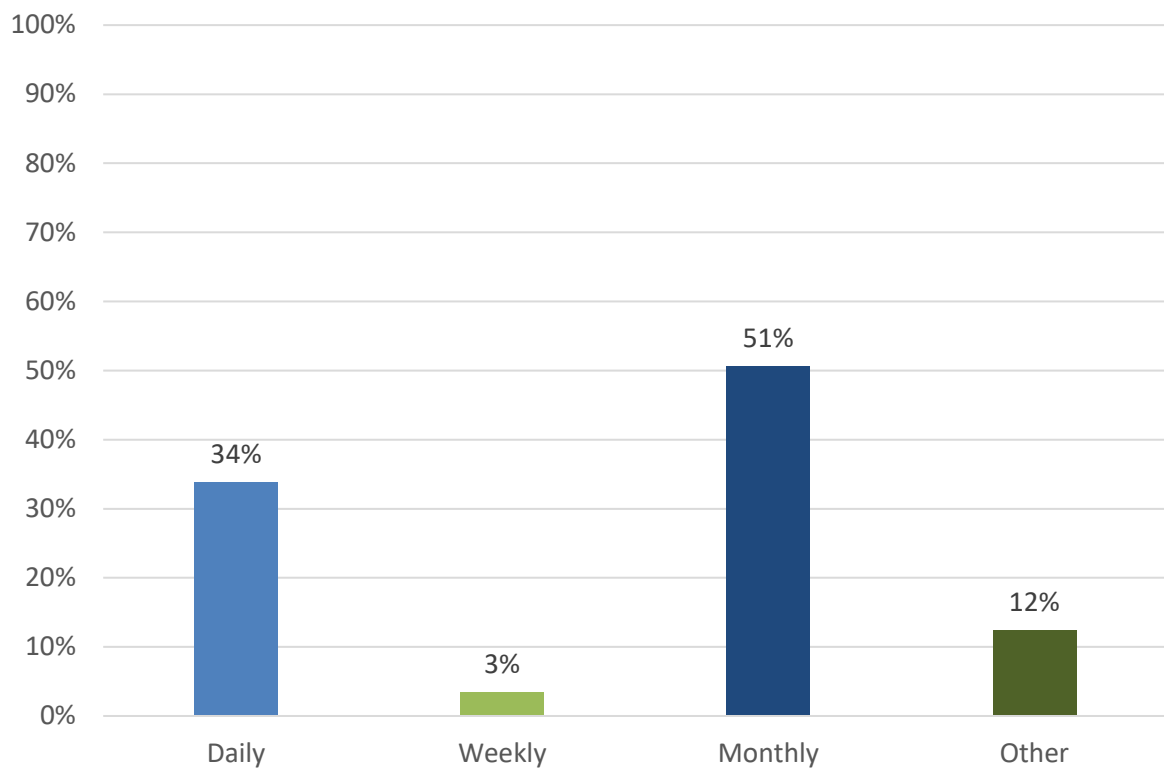


Figure 7: Control mechanism – observation resolution

As seen in Figure 8, the large majority of the respondents that monitor roaming usage and duration do this for all services. Only 13 % of them monitor data-only services.

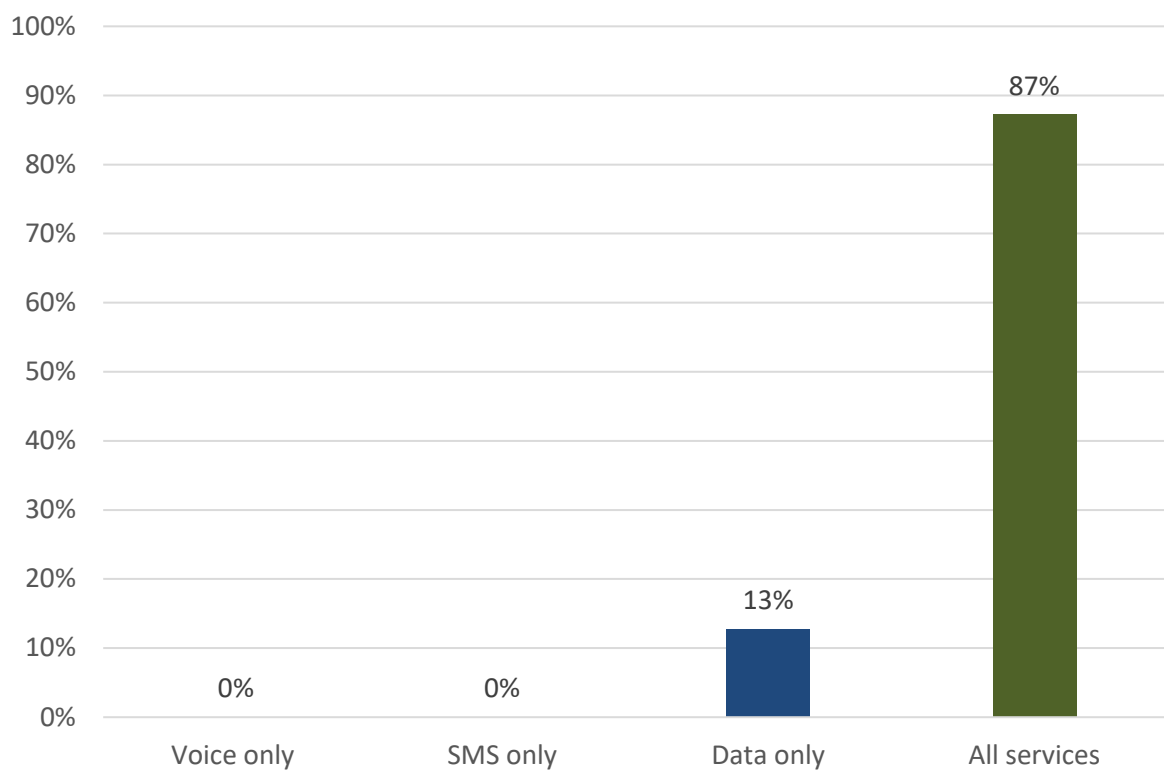
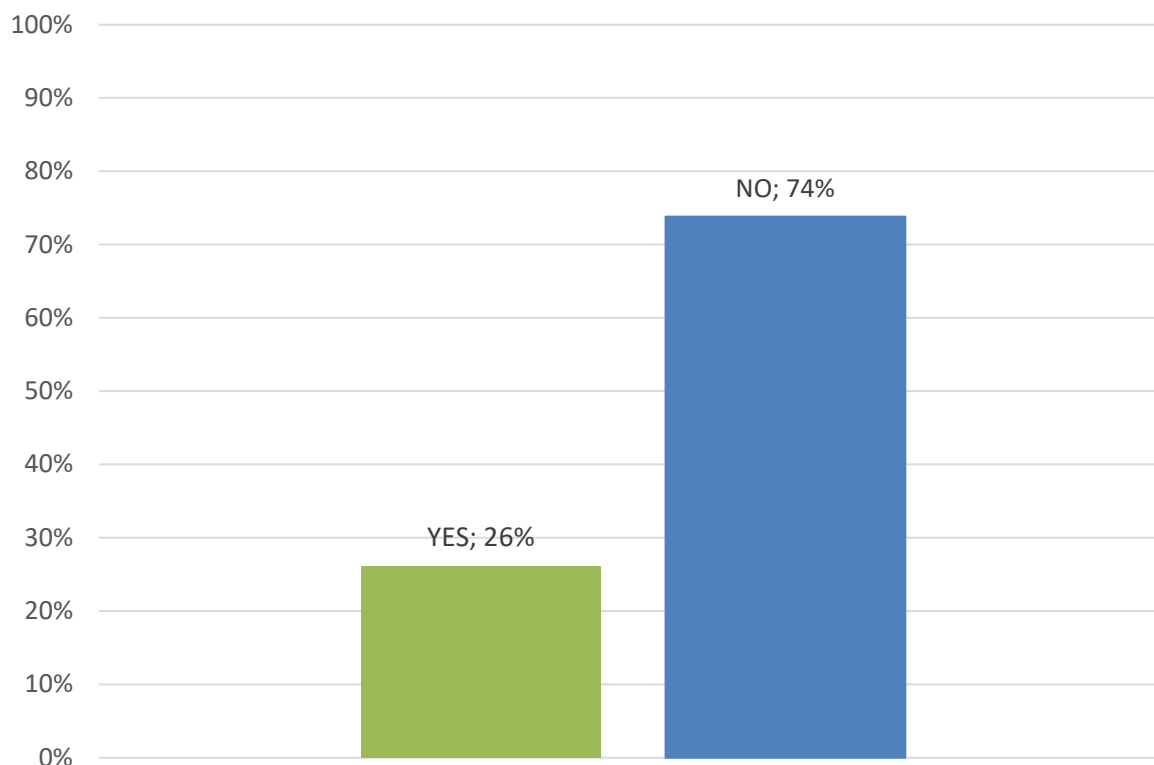


Figure 8: The services observed under a control mechanism

When it comes to the implementation of control mechanisms for other objective indicators, 26 % 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**

46 % of the responding operators answered that they offer 3G roaming services in countries where 4G would be available. 79 % of these operators are planning to move to 4G roaming services within the next year.

Some operators linked the provision of retail roaming services in the EU/EEA to particular conditions to be fulfilled by the customer. One operator requested a minimum first top up for prepaid offers to be activated for roaming services, other operators blocked roaming services of customers with a bad credit score until the second invoice was paid.

As shown in Figure 10, 48 % of the responding operators include non-EEA destinations in some of their RLAH offers. More than 30 non-EEA countries were mentioned by the operators. 70 % of them included Switzerland in some of their RLAH tariffs, followed by Monaco (50 %) and United States of America (31 %). Faeroe Islands were included in more than 29 % of the RLAH offers. Operators often responded that non-EEA countries were included only in some of their offers, for example business tariffs.

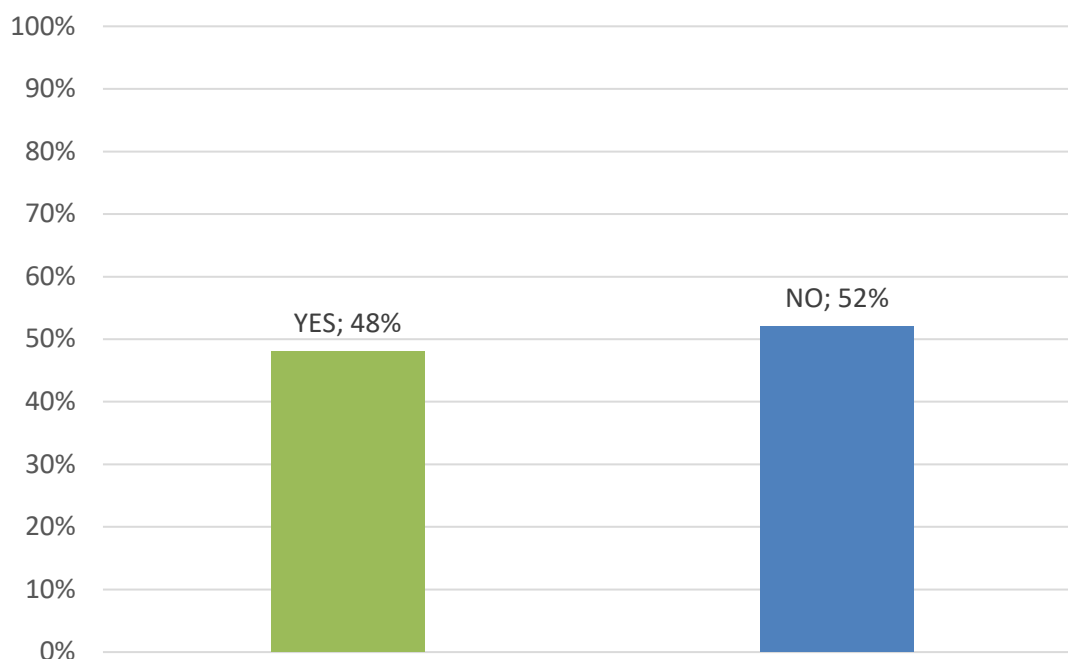


Figure 10: Information on whether operators include non-EEA destinations in some of their RLAH offers

3.2. RLAH with derogations

Of the operators that have been authorised by the NRA to derogate from RLAH, 47 % make use of the derogation, whereas 53 % do not use the derogation granted. From the operators that use the derogation, the majority of 67 % apply the roaming surcharge to only some tariff plans, not to all tariffs. Regarding roaming services, only 43 % of the operators that use the derogation apply a surcharge to all roaming services (voice, data, SMS), the majority of 57 % apply the surcharge to only a part of the services. Where the surcharge is applicable, 57 % of the operators apply the surcharge to only parts of the roaming consumption, whereas 43 % of the operators apply the surcharge to the whole roaming consumption.

3.3. 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.

32 % of the responding operators offer alternative roaming tariffs. BEREC has collected information on the type of packages offered as alternative roaming tariffs (whether they are daily, weekly, monthly or other tariffs).

Of all responding operators which offer alternative roaming tariffs, 29 % of operators offer such tariff in the form of daily packages, 23 % in the form of weekly packages and 48 % in the form of monthly packages. In addition, 40 % of the responding operators include non-EEA destinations like Switzerland in alternative roaming tariffs.

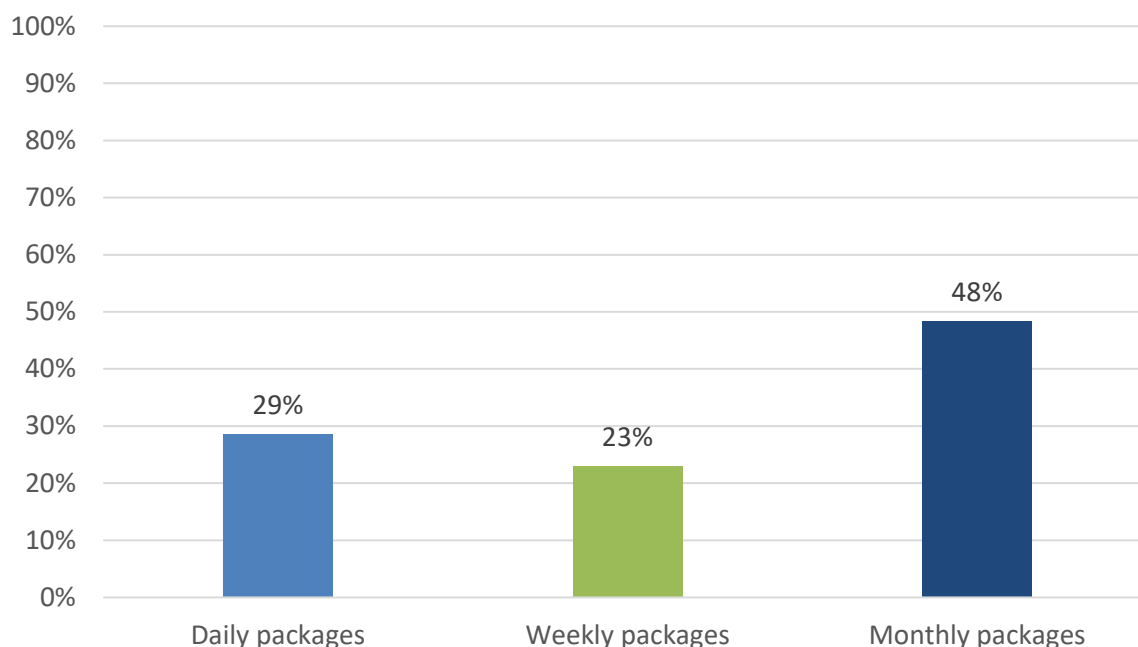


Figure 11: Information on the structure of alternative roaming tariffs

As shown in Figure 12, 15 % of the responding operators offer alternative roaming tariffs only in the consumer segment, 36 % only in business segment and 49 % in both segments.

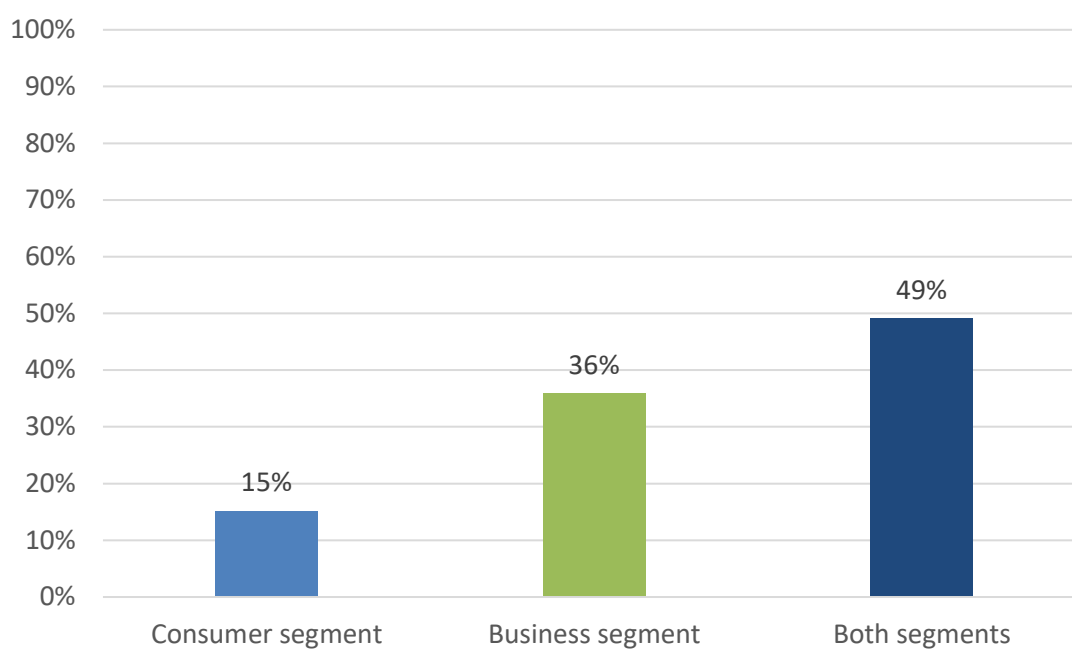


Figure 12: Information on the segment of alternative roaming tariffs

3.4. Tariffs without roaming

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, 34 % of the responding operators offer such tariffs. Most of the operators stated that tariffs without roaming are mostly dedicated data only plans or fixed wireless access products that can only be used on a specific location. Some operators also mentioned that low end tariffs and prepaid offers are restricted to national use. According to the respondents, 17 % withdrew roaming services from their tariffs.

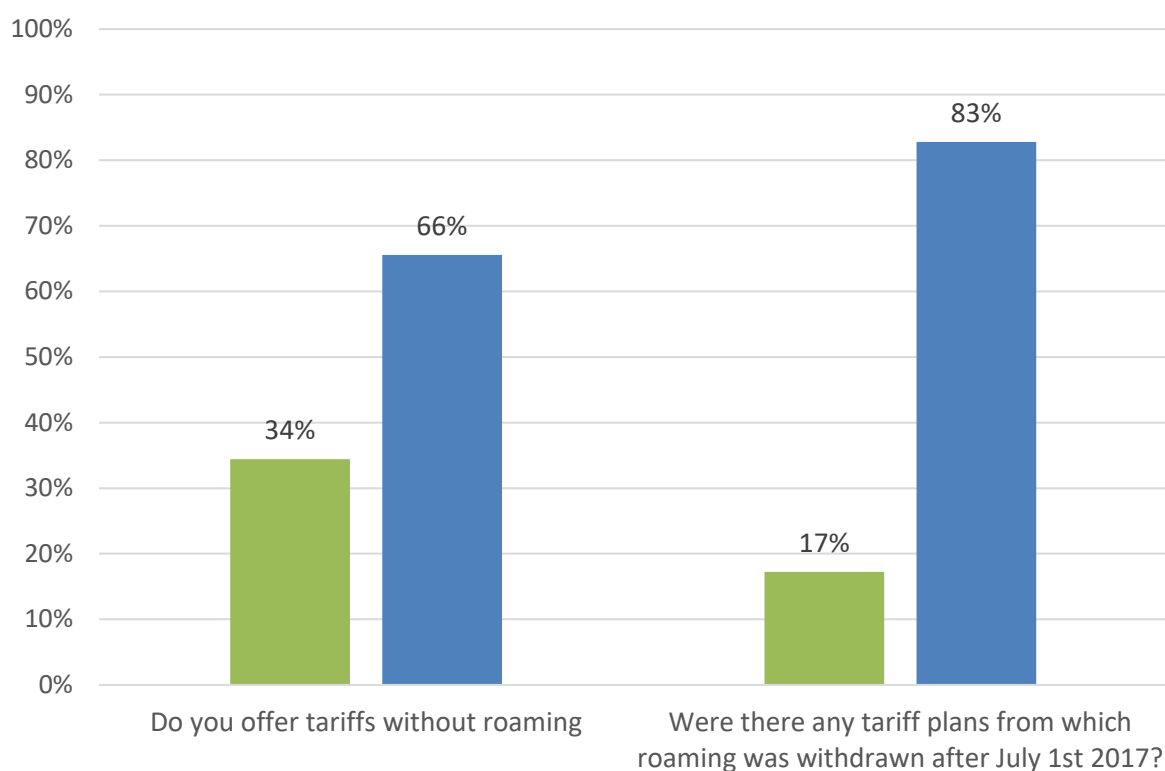


Figure 13: Information on whether operators offer tariffs without roaming and whether there are any tariff plans from which roaming was withdrawn

One operator pointed out that the reason for withdrawing roaming services from a tariff was that the domestic price for the data was too cheap to offer any data while the customer roams within the EEA. Another operator stated that roaming was withdrawn at some prepaid offers because there was no commercial sustainability in the RLAH context.

4. Transparency of roaming services

4.1. Complaints on transparency issues received by NRAs

The questionnaires reveals that 83 % of the responding NRAs have received complaints on transparency issues since July 2017. This is an increase compared to the previous period, in which 76 % of the responding NRAs received complaints.

The total number of complaints registered during this reporting period, was about 3250. Of the 30 responding NRAs, seven received more than 100 complaints each; most other NRAs have received less than 50 complaints. One should note, however, that this might not give a correct picture of the total number of complaints regarding transparency issues. In some countries, other bodies than the NRA³ might handle customer complaints. 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.

³ The complaints reported by CNMC for this report have been provided by the Ministry of Economy and Enterprise. This Ministry has the competences related to end-users complaints in electronic communications services in Spain.

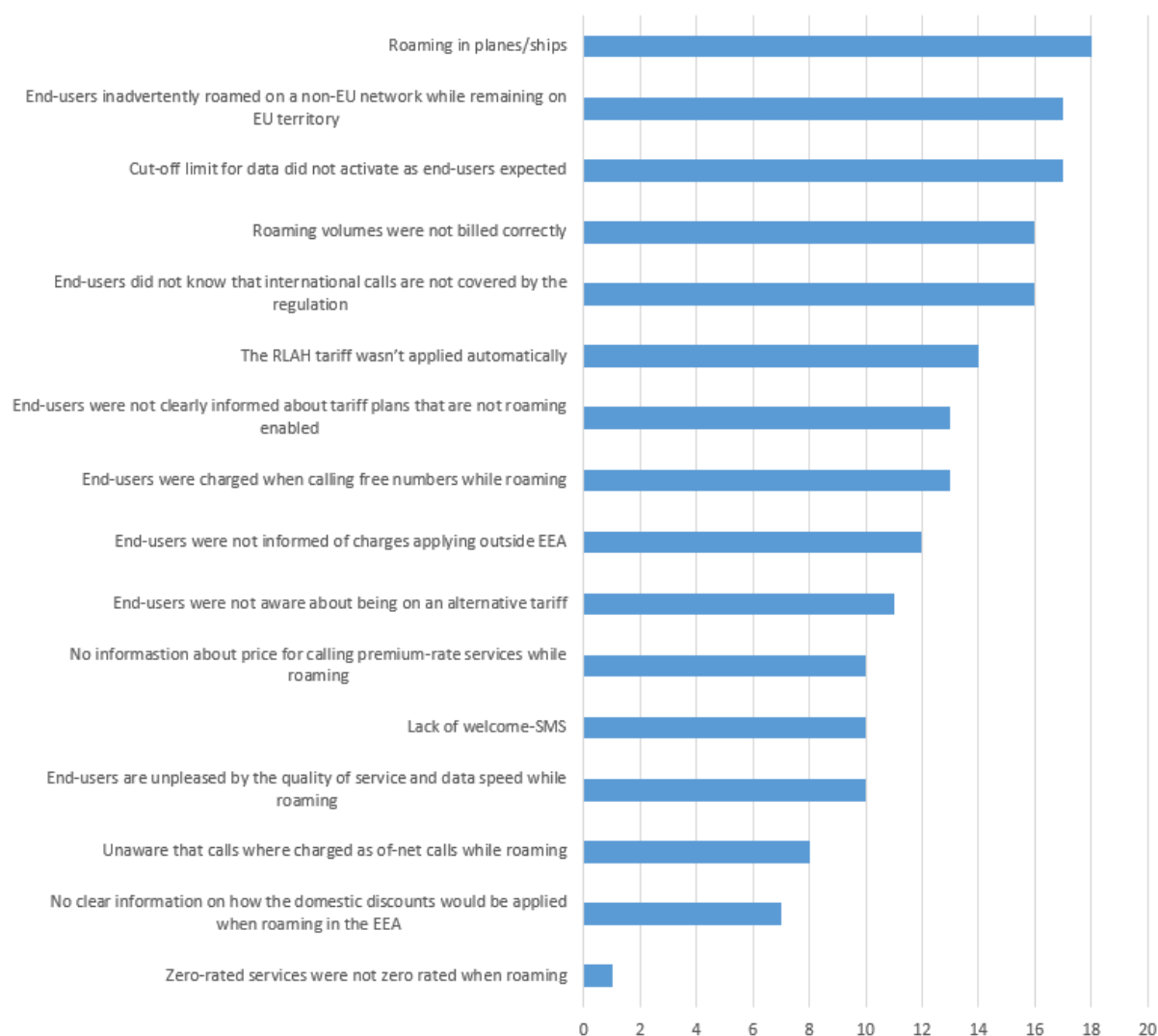


Figure 15: Number of NRAs that have received complaints on different categories of transparency issues

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

Roaming on board of planes and ships, as well as the issue of inadvertent roaming, are the two single categories that cause complaints amongst most of the NRAs that responded to the questionnaire. Complaints related to each of these issues have been received and registered by 18 and 17 NRAs, respectively. When it comes to the problem of inadvertent roaming, an explanation could be that some countries located inside the EEA geographical area are not covered by the price Roaming Regulation. Pricing conditions are then likely to differ from what the end-users expect under the RLAH regime. Three countries received more than 30 complaints each on this issue. Transparency issues when end-users are roaming on ships or planes are still causing complaints in many countries. However, the number of complaints received by each NRA is relatively low, i.e. less than 10.

Another category of complaints that still seems to be common among the NRAs regards the fact that activation of cut-off limits for data services while roaming did not happen the way users expected. In total, 57 % of the responding NRAs received complaints on this issue.

The answers to the questionnaire reveal that 16 (53 %) NRAs have received complaints from customers not knowing that international calls (calls from their home country to another EEA country) were not covered by the Roaming Regulation. This is about the same level as last year. However, the number of complaints received by each NRA is relatively low, i.e. less than 10.

16 NRAs also reported to have received complaints from users stating that roaming volumes were not billed correctly. This is an increase since the last report, when only ten countries reported such complaints. Worth to note is that some NRAs did receive a substantial number of complaints on this issue.

Another issue where the number of complaints has increased since the previous report relates to calls to free numbers while roaming. In these cases, the users did not expect to be billed for such calls since they were free of charge domestically, but still they were charged while roaming. In total, 13 (43 %) of the NRAs reported that they had registered such complaints.

The responses show that 43 % of the 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 providers changed their subscriptions at the introduction of RLAH to be domestic only. Customers might have missed this information and hence gotten problems when they tried to use their subscription abroad.

As for problems related to RLAH not being implemented automatically for the user, 14 (47 %) of the NRAs have registered such complaints. Other complaints, that have been reported by a lesser degree of NRAs in this reporting period, include the lack of a welcome SMS, complaints on service quality while roaming, charges for calling premium-rate services while roaming, billing problems while roaming and a lack of information about the price for on-net calls while roaming.

BEREC also asked NRAs if they had received complaints from end-users on issues related to the FUP during the period from July 2017 to the end of August 2018. This could be either restriction levied on the roaming data volumes, or on the control mechanisms for permanent roaming. Ten NRAs have received complaints regarding the FUP during this period. These complaints were mainly about the value/volume of the FUP and from customers not being aware that a data FUP could be applied.

The figure below shows how many NRAs have received complaints in each of the defined categories of complaints related to the FUP.

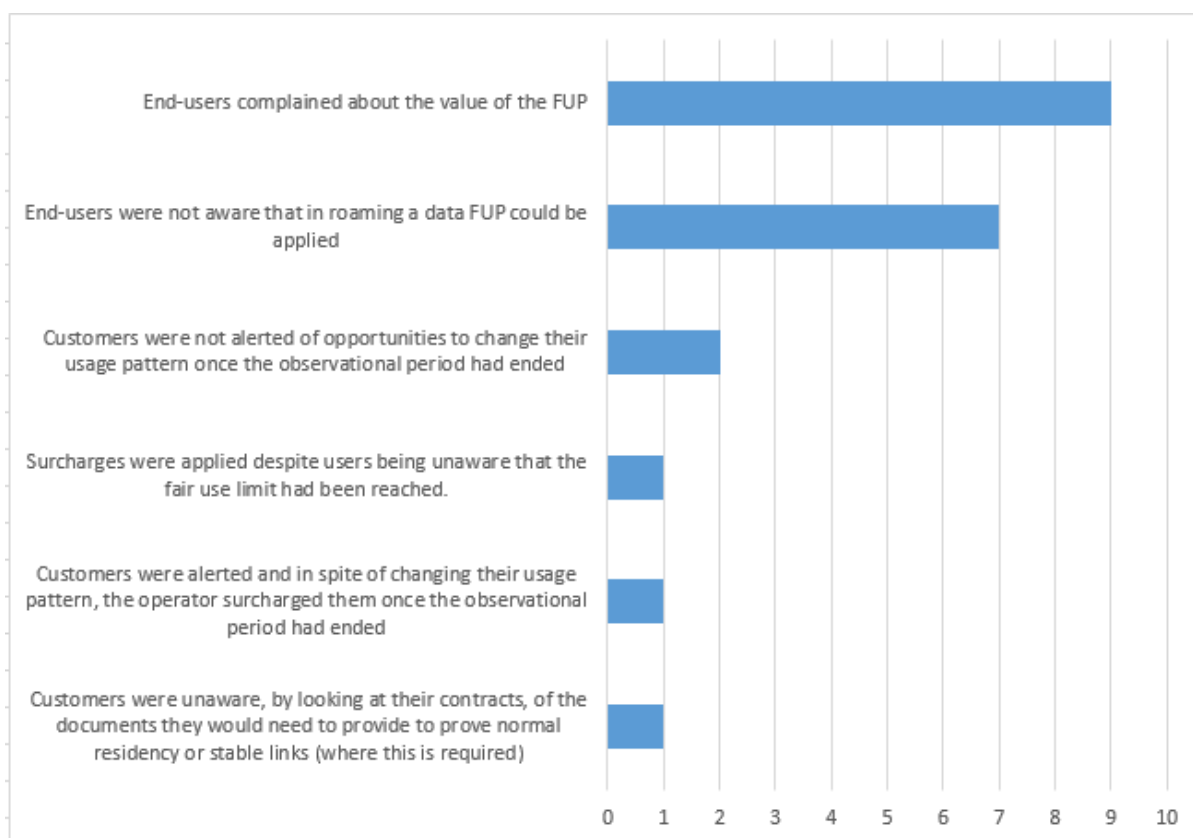


Figure 16: Number of NRAs that have received complaints on the FUP

The number of complaints received in each of the categories were low (less than 10), except for one NRA that received between ten and 20 complaints from customers not being aware that a data FUP could be applied while roaming.

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 RLAH 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 NRAs for information regarding the application of sustainability surcharges.

For the period 15 June 2017 to 14 June 2018, 17 NRAs received applications for sustainability surcharges. In total 57 applications were received, from them 46 were granted and 11 were refused in this period.

In the period from 14 June 2018 to 31 August 2018 only eight NRAs received applications for derogation. In total 29 applications were received. 23 applications were granted and six are

still pending. The figure below shows the number of granted and refused applications in each of the countries that received applications.

	From 15/06/2017 to 14/06/2018			From 15/06/2018 to 31/08/2018			
	Received	Granted	Refused	Received	Granted	Refused	Pending
Austria	3	2	1	2	1		1
Belgium	2	1	1	1	1		
Czech Republic	3	0	3				
Denmark	2	1	1				
Estonia	3	3		3	3		
Finland	4	4		4	4		
France	12	11	1	6	6		
Italy	4	4		3	3		
Lithuania	5	5		4	4		
Netherlands	1	0	1				
Poland	12	12		5	0		5
Portugal	1		1				
Romania	1	1		1	1		
Slovakia	1		1				
Slovenia	1	1					
Spain	1	1					
Sweden	1		1				

Figure 17: Share of granted and refused applications for derogation

In the period from 15 June 2017 to 14 June 2018, around 50 % of the granted applications applied to light MVNOs, 20 % of applications granted applied to full MVNOs and around 30 % of the granted applications applied to MNOs. The providers are operating in both the residential and business segment. Most of the providers that were granted derogation have a small market share. However, in three countries applications from MNOs with 30 % market share each were granted. The market share of these providers accumulated to between 90 and 100 % of the total national market. Two countries granted a derogation to 12 operators each. In one of these countries⁴, the market share of the twelve operators were very low.

The level of the surcharge for voice were in all countries set at or below the caps. This was also the case for the level of the surcharge of SMS. Two NRAs accepted surcharges above caps for data.

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.

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 %.

4.3. 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. About 97 % of the operators inform their customers via welcome SMS that the domestic tariff is applied while roaming.

The welcome SMS should also include information on the fair use policy the roaming customer is subject to and any surcharges that apply in excess of the FUP. Around 74 % of the operators that apply a fair use policy, provide information on this in the Welcome SMS.

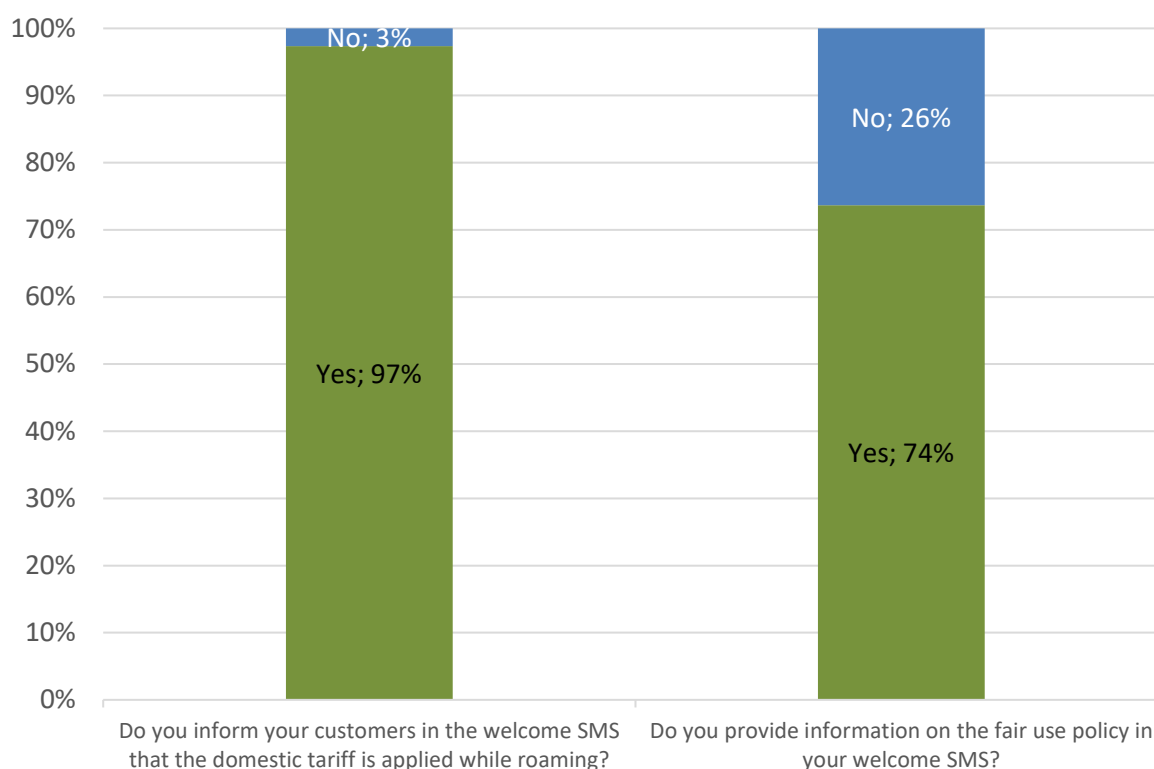


Figure 18: "Welcome SMS" informing about RLAH

4.4. Information about 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. 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 required 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.

98 % of the respondents inform end-users that have opted for alternative tariffs about the regulated tariff. The three most common ways to inform customers about the regulated tariff are at call centres (88 %) followed by points of sales (86 %) and website (81 %). In addition, roaming providers provide information about the regulated tariff by SMS (52 %), via a personalized webpage (40 %), via an application (38 %) and via the customer's bill (28 %).

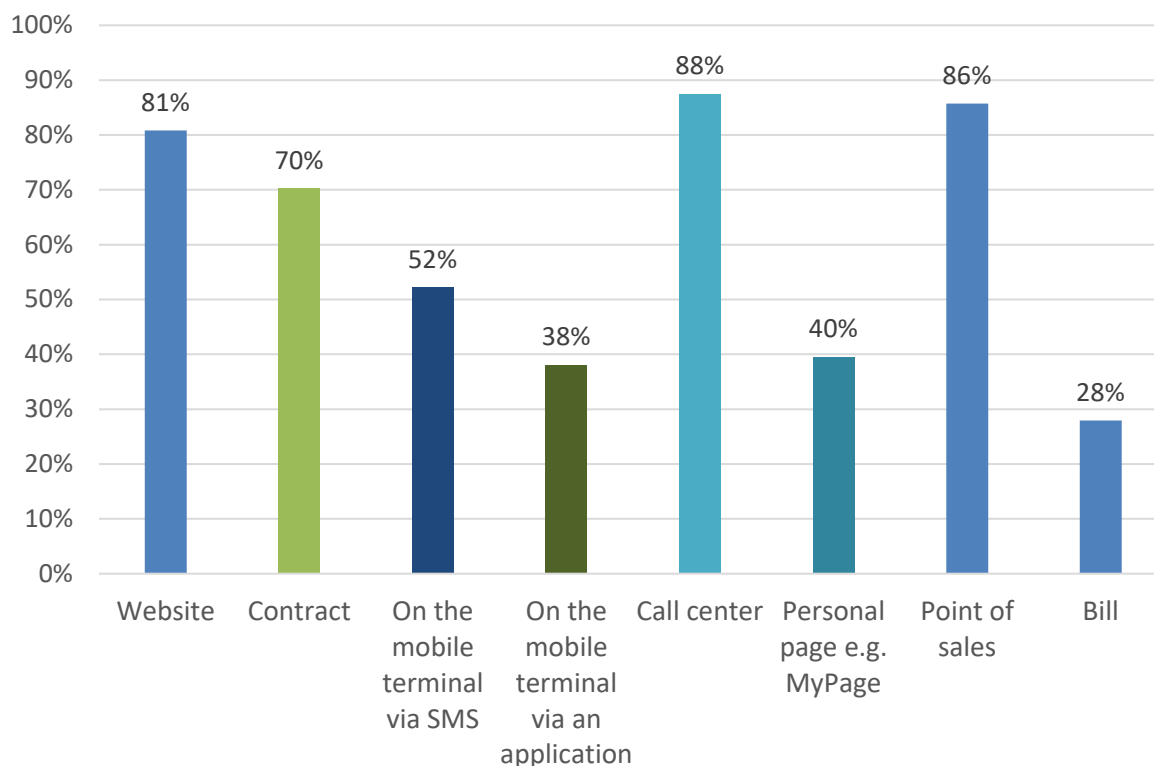


Figure 19: Source of information about regulated tariffs for customers subscribed to an alternative tariff

4.5. Information about switching between tariffs

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

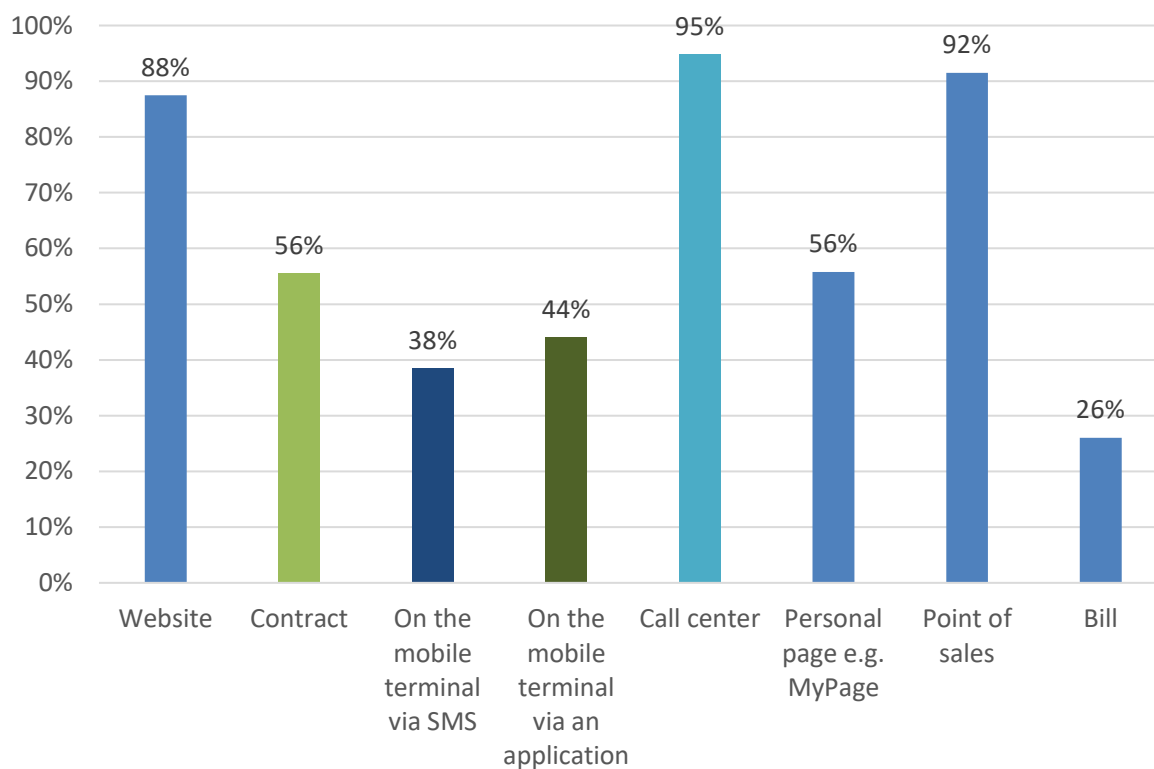


Figure 20: Source of information about switching between tariffs

Most of the roaming providers inform their customers by means of call centres (95 %), at the points of sales (92 %) or their website (88 %) regarding the possibility to switch between tariffs. Other methods that are used are MyPage services (56 %), contract (55 %), SMS (38 %) and via the bill (26 %).

The majority (about 92 %) 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, 78 % 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 22 % 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, 87 % of 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. Also, 89 % of the operators notify their customers when they reach the limit of the bundle, while 81 % 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 (95 % for historical charges and 97 % for historical volumes as shown in Figure 21; 71 % for real-time charges and 74 % for real-time volumes as shown in Figure 22) who responded to the questionnaire said that they enabled their customers to use different methods to access this information.

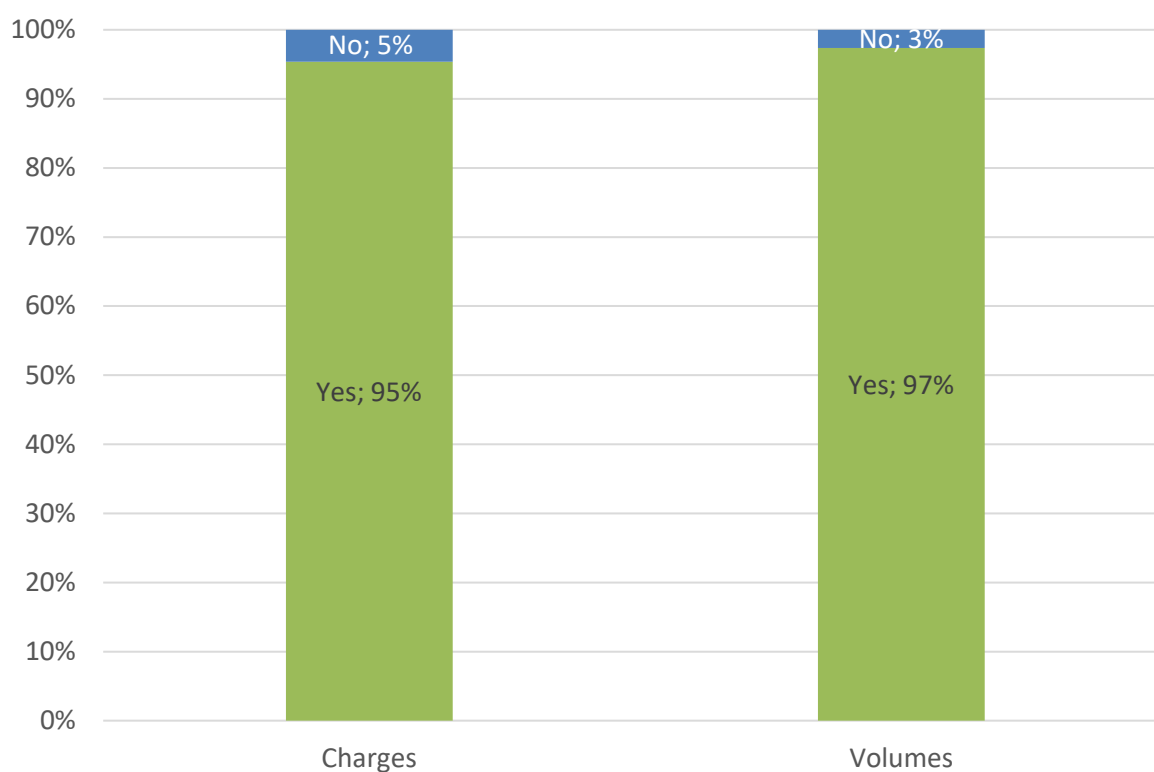


Figure 21: Information for end-users about charges for intra-EU roaming

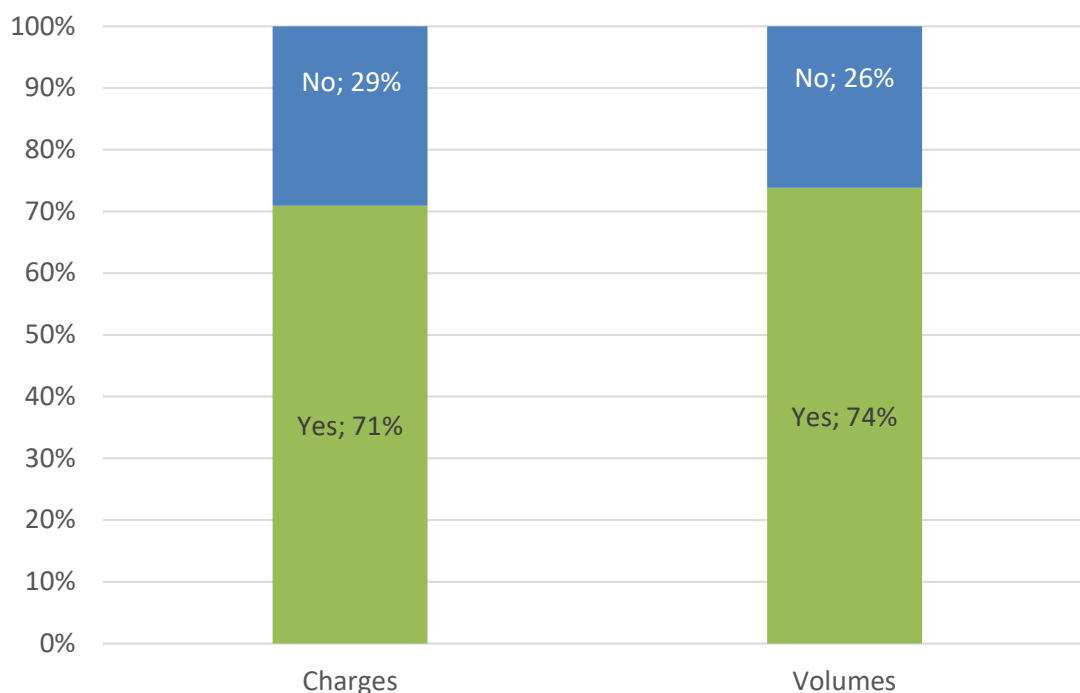


Figure 22: Information for end-users about consumption for intra-EU roaming

The results of the questionnaire show that almost all providers who responded to the questionnaire make historical service records available to their customers (Figure 23). The most used communication channel for delivering historical information to customers is via bill (96 %), followed by call centre agents (95 %), then personal page e.g. My Page (92 %) the customer area on the providers' website (74 %), via specific applications on mobile terminals (70 %), via points of sales (63 %), on the mobile terminal via SMS (53 %) and contract (39 %).

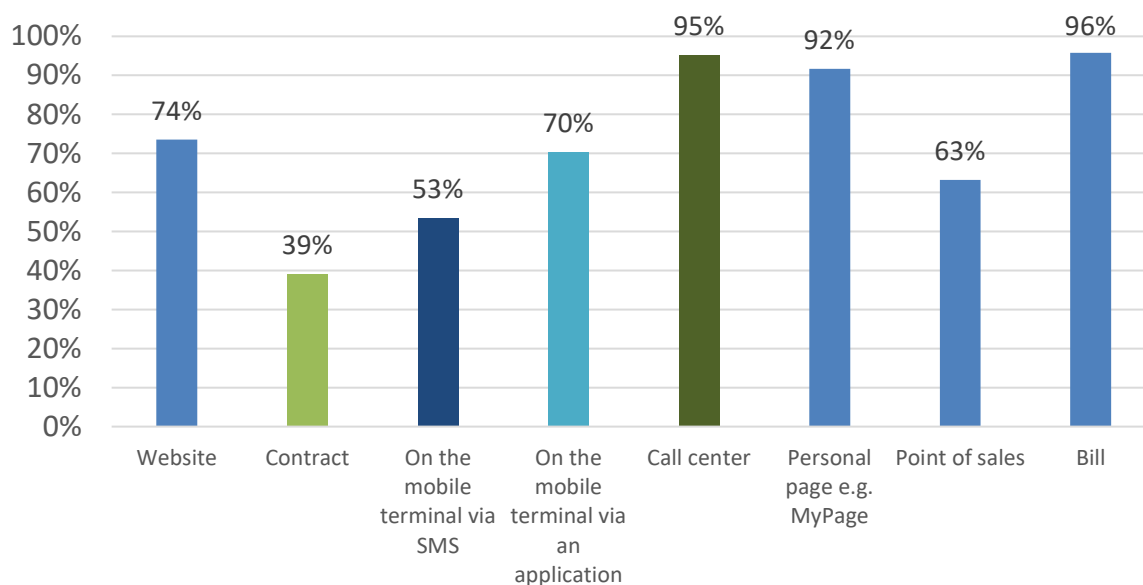


Figure 23: How is the information about charges and/or volumes consumption provided to end-users (Historical)

As shown in the following Figure 24, 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.

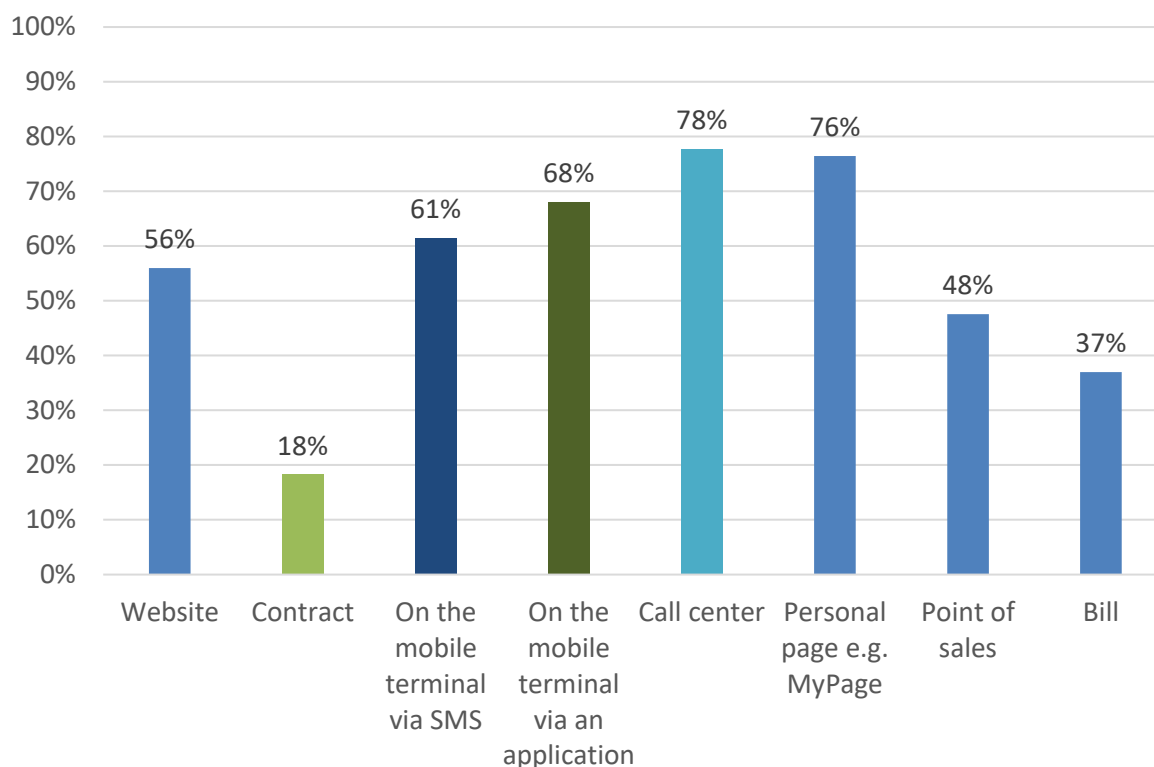


Figure 24: How is the information about charges and/or volumes consumption provided to end-users (Real-time consumption)

The most popular way for providers to supply data on real-time consumption is via call centre agents (78 %). The second most popular way is on the personal page e.g. My Page (76 %) followed by the use of a specific app installed on the terminal (68 %), then by interaction via the mobile terminal via SMS (61 %), by publishing information in customer areas on the providers’ websites (56 %) and by points of sales (48 %).

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 providing information about 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. 70 % (+7 percentage points compared to 2017 for historical data) of the operators participating in this year’s survey stated that they provided information via apps for historical data and 68 % (+13 percentage points compared to 2017) 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 (+2 percentage points and +4 percentage points, respectively, compared to 2017). The second most popular way to provide historical and real-time information is via the personal page e.g. My Page (92 % and 76 % respectively). Customer area on the providers' website is still in the third place of preferred communication channels. Operators provide more or less the same level of transparency (a few percentage points higher than in 2017) when it comes to supplying information on consumption, on both historical and real-time consumption, compared to the previous year.

4.7. Providing information within the fair use policy

According to Article 4 CIR roaming providers are allowed to implement a fair use policy. Especially in cases of fair use policies which depend directly on the consumption of regulated roaming services, providing transparent information is necessary.

4.7.1. 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 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.

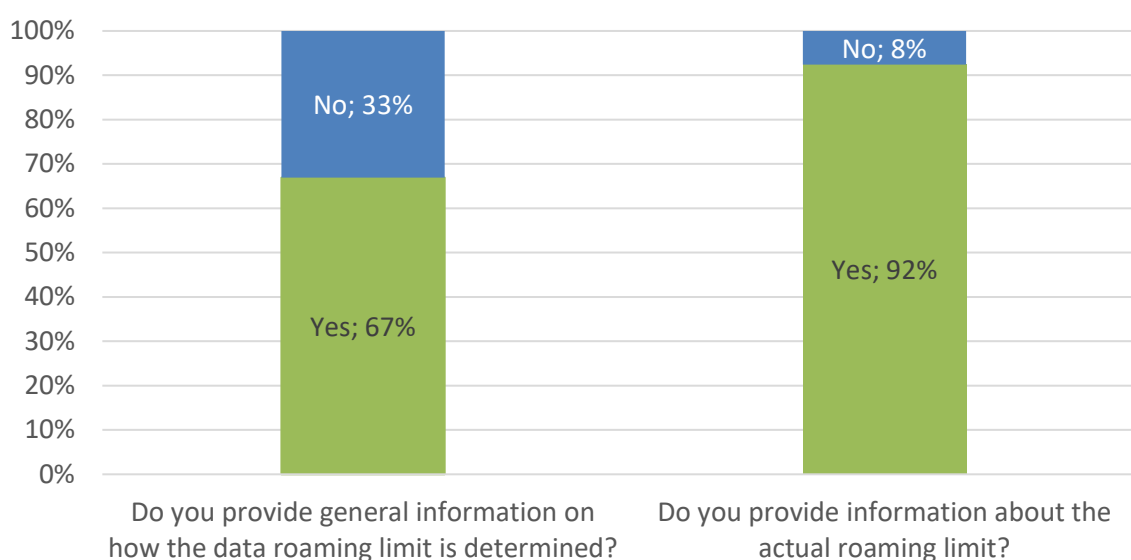


Figure 25: Information about charges and consumption within a FUP in case roaming volumes are calculated according to the open-data bundle rule

Figure 25 shows that 67 % 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. This is around 7 percentage points less than in 2017. In addition, 92 % of the roaming providers which established a fair use policy according to the open-data bundle rule provide information for customers about their actual roaming volumes. This is almost 8 percentage points less than in 2017.

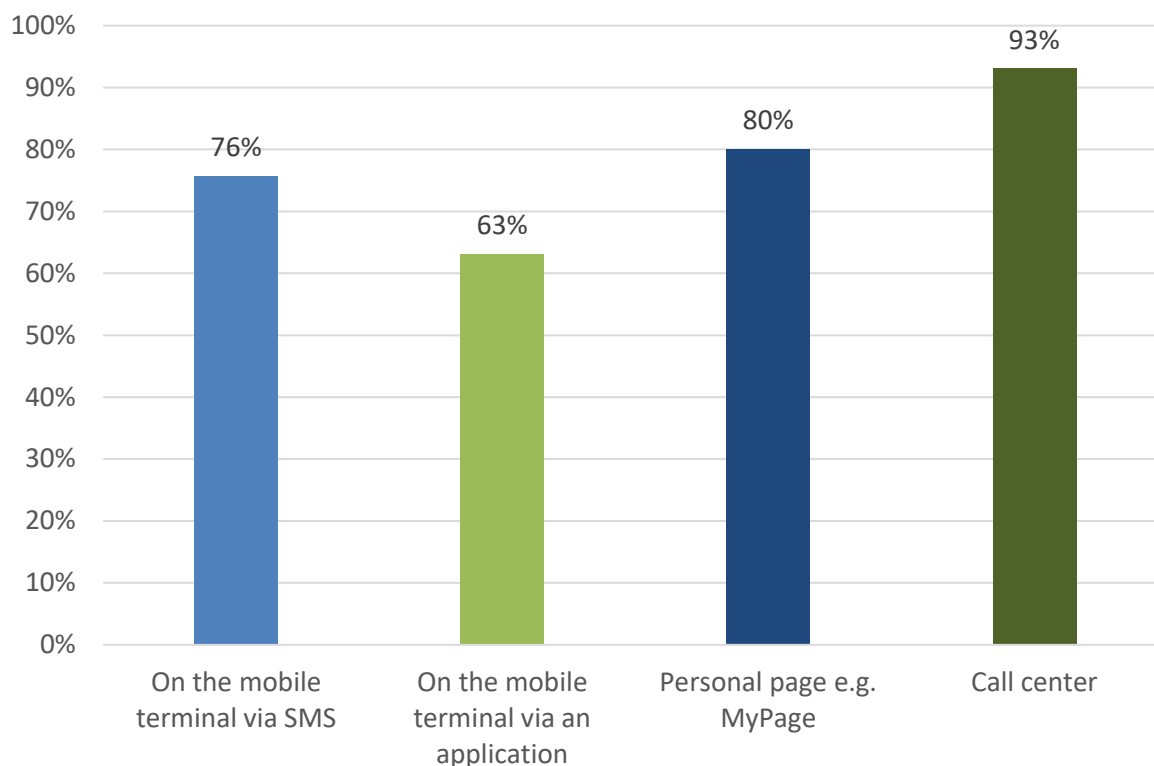


Figure 26: Means for providing information in case roaming volumes are calculated according to the open-data bundle rule

As Figure 26 shows, the actual roaming allowance is mostly provided via call centres (93 %), followed by the personal page e.g. my Page (80 %), on the mobile terminal via SMS (76 %) and on the mobile terminal via application (63 %).

95 % of the operators inform end-users actively when they reach the roaming limits included of the open-data bundle.

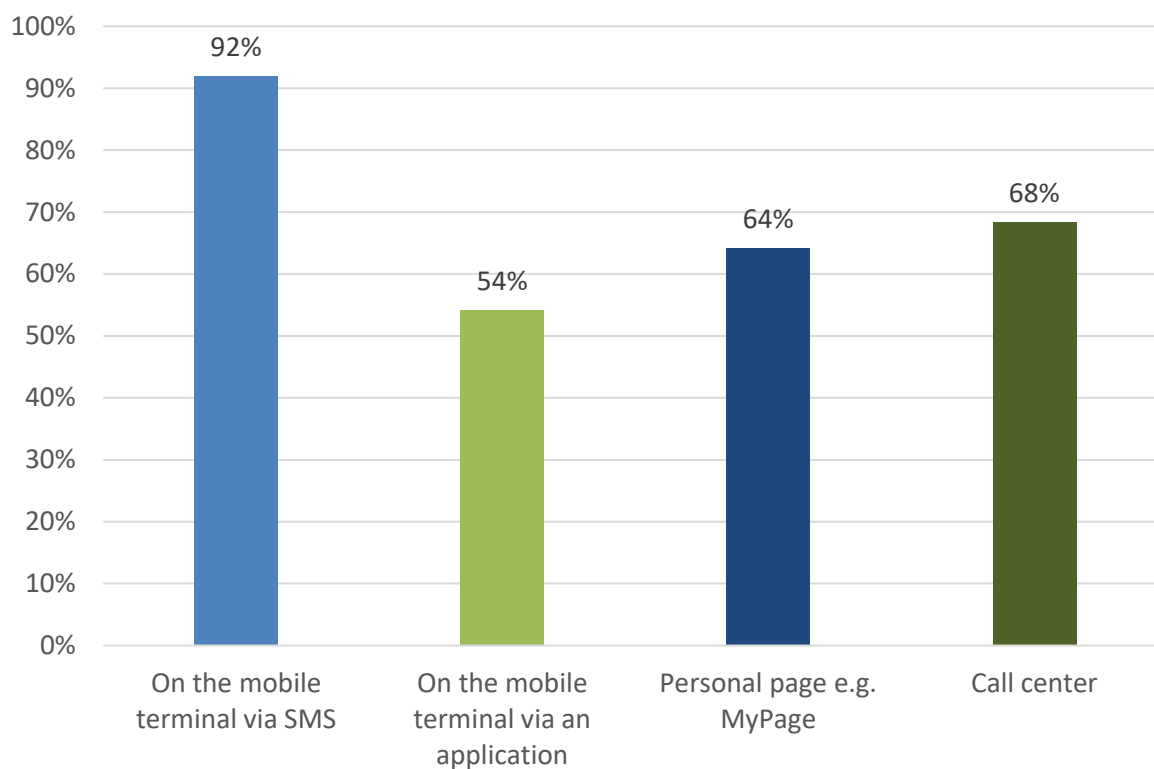


Figure 27: How do you provide information on actual available roaming volumes to the end-users

As Figure 27 shows, most used communication channels for informing end-users about reaching the roaming limits are the following: on the mobile terminal via SMS (92 %); via call centre agents (68 %); via personal page e.g. My Page (64 %) and on the mobile terminal via an application (54 %).

4.7.2. Objective indicators

In addition to the open-data bundle fair use policy, roaming providers are also allowed to implement a control mechanism over a 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.

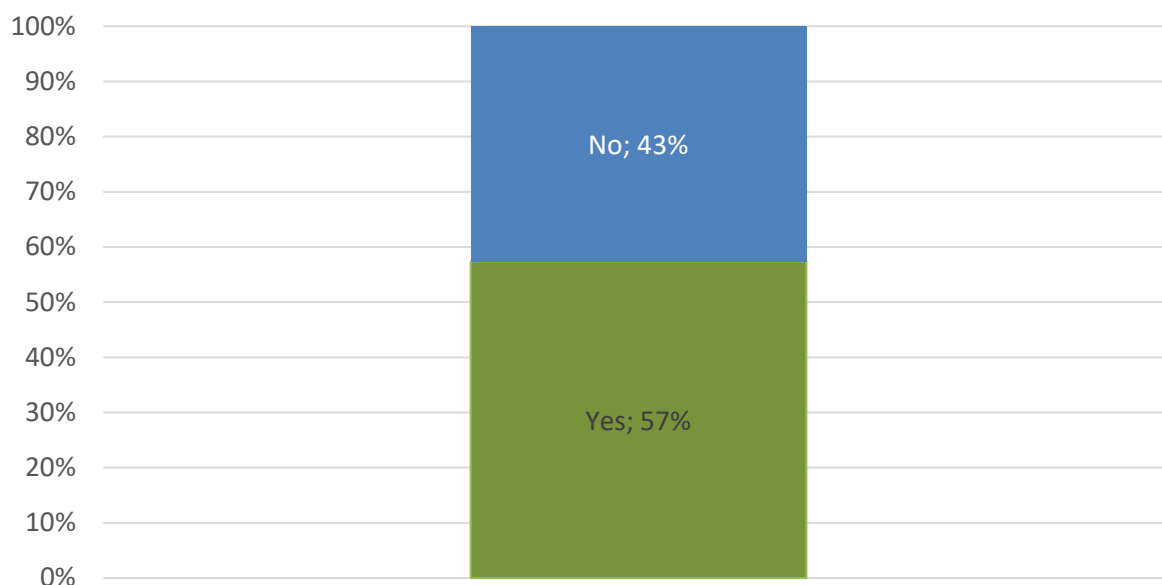


Figure 28: Do you provide information within the observation period?

Therefore 57 % of the respondents state that they already make such information available to their customers within the observation period. This is almost 16 percentage points less than in the previous year.

Roaming providers which provide such information mainly focus on the consumption of their customers; not on the presence control. As shown in Figure 29, 65 % of the operators provide information on domestic usage and 69 % on roaming usage, while 41 % of the operators provide information on domestic presence and 47 % on roaming presence.

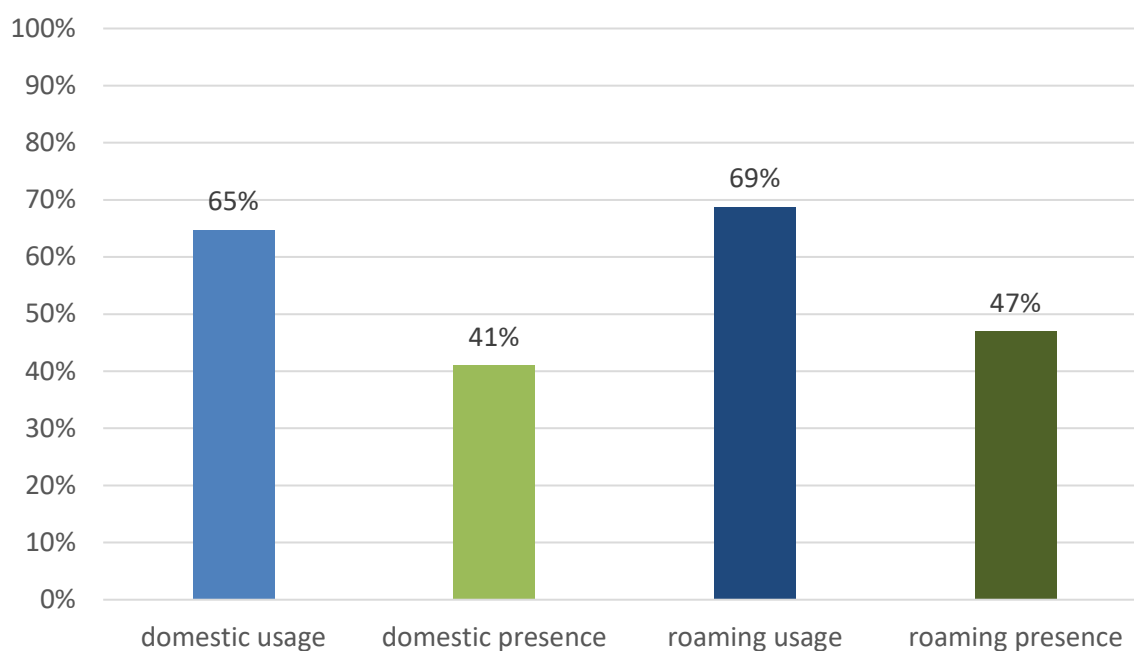


Figure 29: Information provided in case the control mechanism is applied

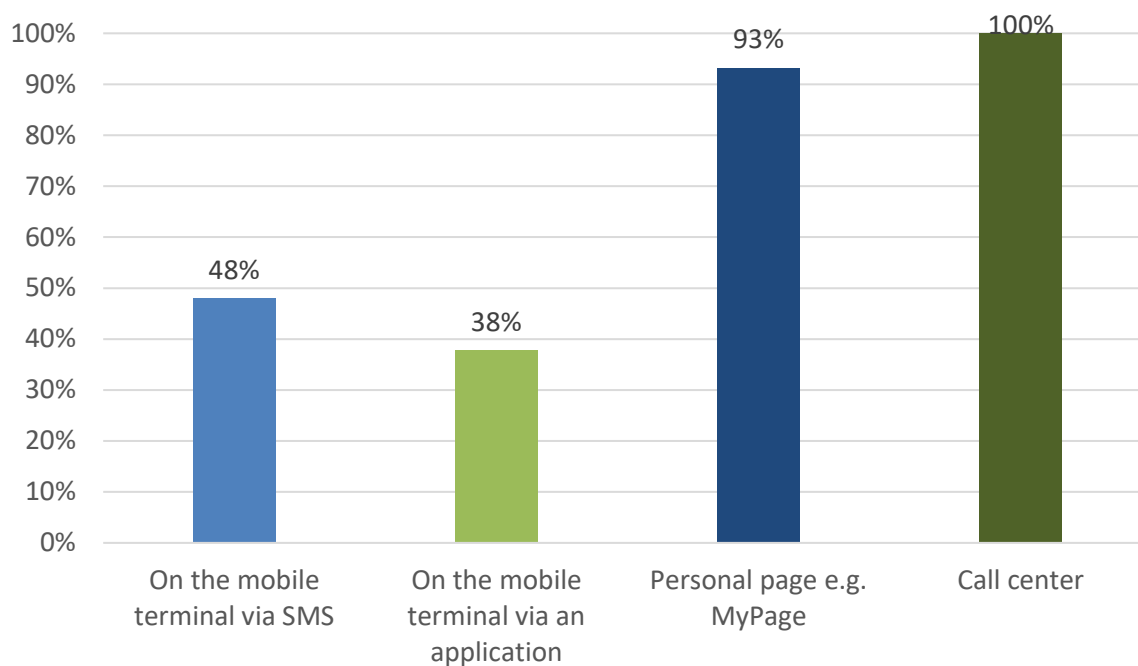


Figure 30: How is such information provided (roaming services)

The roaming providers which inform their customers already within the observation window stated that such information is mainly presented for roaming services via call centre (100 %); followed by the personal page e.g. My Page (93 %); on the mobile terminal via SMS (48 %) and on the mobile terminal via an application (38 %).

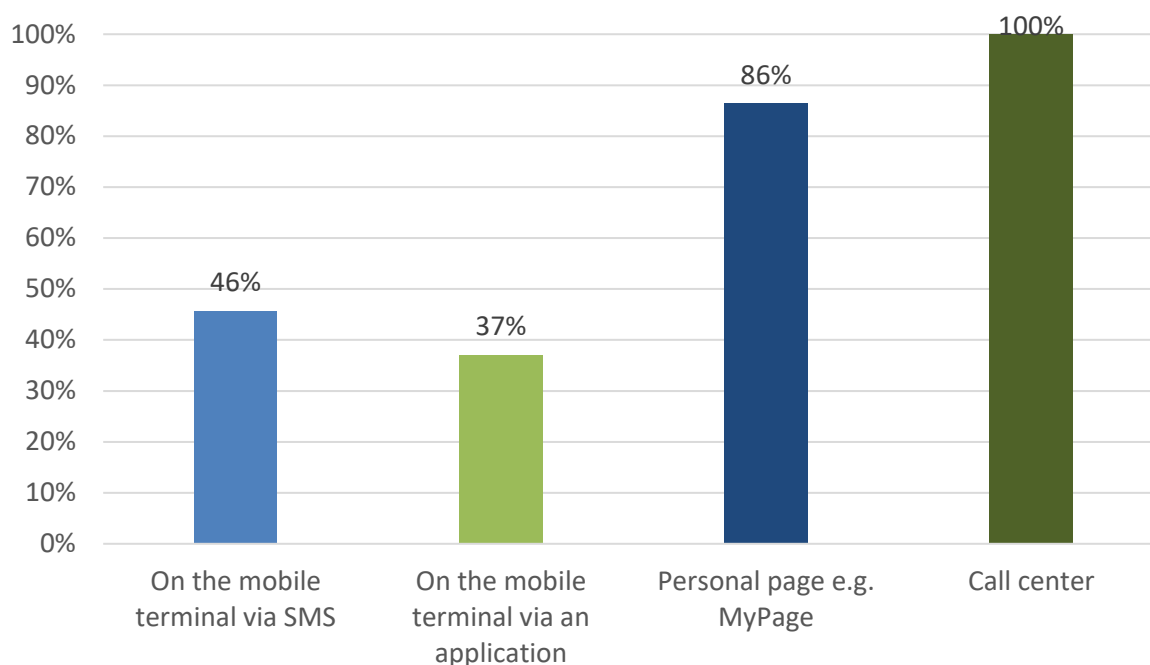


Figure 31: How is such information provided (domestic services)

At the same time, such information for domestic services are mainly given by call center agent (100 %), presented on the personal page e.g. My Page (86 %), followed by information given on the mobile terminal via SMS (46 %) and on the mobile terminal via an application (37 %).

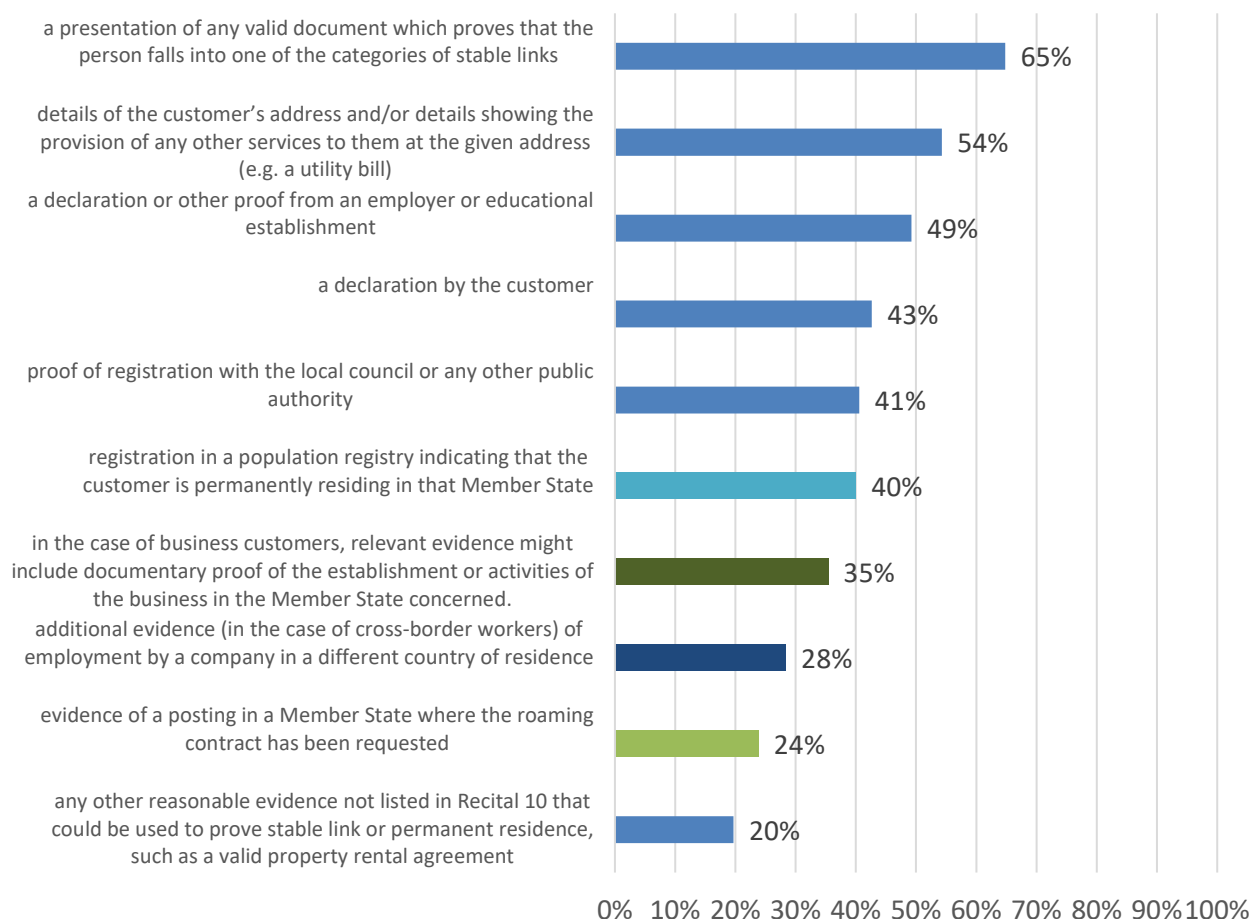


Figure 32: What kind of evidence is requested to assess stable links

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 (65 %); 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) (54 %); a declaration or other proof from an employer or educational establishment (49 %); a declaration by the customer (43 %); proof of registration with the local council or any other public authority (41 %); registration in a population registry indicating that the customer is permanently residing in that Member State (40 %); 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 (35 %); additional evidence (in the case of cross-border workers) of employment by a company in a different country of residence (28 %); evidence of a posting in a Member State where the roaming contract has been requested (24 %); 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 (20 %).

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, 11 % reported that they offered tables for such comparison.

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.

7 % of the responding NRAs are aware of such comparison tables or information. 7 % of responding NRAs reported that consumer associations or other organizations have published recommendations for end-users in order to help them select the most adequate international roaming tariff. 3 % of the responding NRAs were not aware of any publicly available report provided by consumer associations or other organizations which compares international roaming tariffs.

5.1.3. Tables on NRAs' websites comparing tariffs

22 % of the responding NRAs reported that they provided information on their website comparing domestic tariffs including intra-EEA roaming provided by different operators facilitating comparison of RLAH tariffs. BEREC also asked whether NRAs provided up-to-date

information comparing alternative roaming tariffs (including tariffs that combine intra-EEA and Rest of the World roaming) facilitating comparison of RLAH tariffs. 18 % of the NRAs reported that they provided such information. 21 % of the responding NRAs reported that they provide updated information on their websites comparing tariffs that have a sustainability surcharge and 14 % of the responding NRAs reported that they provide updated information on their websites comparing roaming tariffs for non-EEA-countries.

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 few NRAs or consumer associations provide such tables with comparisons.

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

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. Any tools for estimating future data usage could 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 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.

35 % of the operators responded that they 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 such as Google Maps or WhatsApp.

15 % of the operators reported that they provided applications to help consumers to select the most adequate tariff, including intra-EU roaming based on their estimation of consumption. Very few providers actually have interactive tools where the customers' consumption patterns are the starting point for selecting the most adequate tariff. 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. 7 % of NRAs reported that consumer associations or other organizations in their Member State provided information to end-users facilitating the comparison of tariffs by providing applications for end-users to decide which type of tariff to select based on an estimation of their consumption for international roaming.

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 2017 to 31 August 2018)			
		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 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.	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		
		Yes/No
3.1.	Is there updated information on your website comparing domestic tariffs including intra-EEA roaming, provided by different operators?	
3.2.	If yes, please provide the link	
		Yes/No
3.3.	Is there updated information on your website comparing alternative roaming tariffs (including tariffs that combine intra-EEA and Rest of the World roaming)?	
3.4.	If yes, please provide the link	
		Yes/No/NA
3.5.	Is there updated information on your website comparing tariffs that have a sustainability surcharge? (NA if no operators are granted sustainability surcharge)	
3.6.	If yes, please provide the link	
		Yes/No
3.7.	Is there updated information on your website comparing roaming tariffs for non-EEA countries?	
3.8.	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 May 2017 to 31 August 2018)		
	Yes/No	If yes, please provide the link
4.1.	Have consumer associations or any other organization provided: 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?	

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 Structure of default regulated tariffs according to Article 6a				
Please, respond Yes/No in the corresponding cells.				
		Available Yes/No	If yes, what kind of implementation	Comment
2.1.1.	Do you apply an open-bundle data limit?			
	a) You apply a data limit to every tariff plan classified as "open data bundle"			
	Do you apply a roaming data limit for prepaid tariffs?			
	a) You apply a data limit to every prepaid tariff plan providing data roaming services			
2.1.2.	Have you implemented the residence/stable link criterion?			
	a) You apply the residence/stable link criterion to every tariff plan			
	Have you implemented the control mechanism for permanent roaming, anomalous or abusive uses?			
2.1.3.	a) You apply the control mechanism to every tariff plan			
	b) If yes, is it for four months (Answer 'No' if longer, please specify in the comment 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)			
	Do you link the provision of retail roaming services in the EU/EEA to particular conditions to be fulfilled by the customer (e.g. only after a period of several months for new customers, appropriate credit score/payment record, bank deposit, etc.)			
2.1.5.	a) If yes, please specify the conditions in the comment box			
2.1.6.	Do you offer 3G roaming services in the EU/EEA where 4G would be available?			
	a) If yes, are you planning to move soon (i.e. within the next year) to 4G roaming services wherever 4G is available in the EU/EEA?			
2.1.7.	Do you include non-EEA destinations in some of your offers?			
	a) If yes, list non-EEA destinations included in RLAH tariffs			
	b) Please specify in the comment box the approximate share of your customer base covered by RLAH offers including non-EEA countries			
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.	Do you offer any alternative tariffs in line with Article 6e (3)?			
	In which segment(s) are alternative tariffs offered? (Mostly consumer, mostly business, similarly both segments)			
2.2.2.	Does your company offer daily packages?			
2.2.3.	Does your company offer weekly packages?			
2.2.4.	Does your company offer monthly packages?			
2.2.5.	Does your company offer other tariffs? Please give a short description			
2.2.6.	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?			
2.2.7.	If yes, please list those destinations			
2.2.8.	Other types of alternative tariffs, please give a short description			
2.2.9.				

2.3 Tariffs without roaming		Available Yes/No	Comment	
2.3.1.	Do you offer pre-paid tariffs without roaming?			
2.3.2.	Do you offer post-paid tariffs without roaming?			
2.3.3.	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	If yes, since when	Comment
2.3.4.	Were there any tariff plans from which roaming was withdrawn after July 1st 2017?			
2.3.5.	If yes, please describe the reason for withdrawing roaming services from a tariff.			
2.4 Derogation: In case you have been authorised by the NRA to derogate from RLAH		Yes/No	Comment	
2.4.1.	Do you make use of the derogation you have been granted?			
2.4.2.	If yes, do you apply the roaming surcharge to all tariff plans?			
2.4.3.	If only to some tariff plans, please specify the criteria for selecting the tariffs where the roaming surcharge is applicable			
2.4.4.	In the tariff plans where the roaming surcharge is applicable, do you apply the surcharge to all roaming services (voice, sms, data)?			
2.4.5.	In the tariff plans and for the roaming services where the roaming surcharge is applicable, do you apply the surcharge to all the roaming consumption?			
2.4.6.	Please provide an approximate share of the total retail roaming consumption of your customers in the EU/EEA that is subject to the surcharge due to the derogation			
3. Information provided by operators (intra-EU roaming tariffs)				
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 the fair use policy 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)	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)			
3.2.3.	If yes, how often do you remind end-users with alternative tariffs of the regulated tariff?	Please indicate period		
Alternative tariffs		Yes/No, N/A		
3.2.4.	Are there any activation charges applied when switching between alternative tariffs? 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?			
3.2.5.	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:			

3.4 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			
3.4.2	In case you are providing information for charges and/or volumes consumption, please identify how this information is provided to end-users			
		Historical Yes/No, N/A	Real-time 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)			
3.5 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?			
3.5.3	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)			
3.5.4	Do you inform end-users actively when they reach the roaming limits included of the open-data bundle ?			
3.5.5	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 that the control mechanism is applied ...		Yes/No		Comment
3.5.6	Do you provide information within the observation period?			
3.5.7	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	Comment
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)			
What kind of evidence is requested to assess stable link and/or normal residence?		Yes/No		Comment
3.5.8	(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 the 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							
		Yes/No, N/A					
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)						
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							
		Yes/No					
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						
4.3 Information for end-users on estimating data traffic consumption							
		Yes/No					
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						
5. Any other input that can be considered useful by the provider							