

Intra-EU communications BEREC Benchmark Report April 2020 – March 2021

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1. Structure of the Report

The Intra-EU communications BEREC Benchmark Report (the “Report”) on Intra-EU communications contains five parts. Chapter two is an **Introduction** to the Body of European Regulators for Electronic Communications (BEREC) Report and describes BEREC’s work on intra-EU communications carried out under Regulation (EU) 2015/2120, of the European Parliament and of the Council, of 25 November 2015, as amended by Regulation 2018/1971, of the European Parliament and of the Council, of 11 December 2018. The third Chapter “**Regulatory evolution**” outlines the background information behind the Intra-EU regulation. The key findings of this Report are included in the fourth Chapter, “**Main findings**”. The fifth Chapter “**Charts**” presents the latest available data on Intra-EU mobile and fixed markets. “**Annex I: Methodology for the data collection**” provides a detailed description of the methodology for the current data collection. “**Annex II: List of respondents**” includes the list of operators that provided data for this Report. The Report is accompanied by a spreadsheet file enabling an easy and open access to the data included in the Report (published together with the Report) for the user.

2. Introduction

The Report presents the results of the 2nd data collection on Intra-EU communications by BEREC that took place after the implementation of the Regulation. BEREC has also collected data for a six-month period (1 October 2018 – 31 March 2019) before the implementation of the Regulation. For comparability reasons, some figures in this Report include also data from operators during period 1 October 2018 – 31 March 2019.

The Report covers the period 1 April 2020 – 31 March 2021, split by two periods: 1 April 2020 to 30 September 2020 and 1 October 2020 to 31 March 2021 (corresponding to the 2nd, 3rd and 4th quarters of 2020 and the 1st quarter of 2021). The figures presented in this report are based on data collected from national regulatory authorities (NRAs) on Intra-EU communications. The figures contained in this Report present information on traffic, revenues, consumption, etc. in regards to Intra-EU services. Similarly to the periodic International Roaming Benchmark Report, all of the data collected during data collection round is included in the accompanying .xls file and published on the BEREC website.

The applicable regulatory framework for this data collection is on intra-EU communications carried out under Regulation (EU) of the European Parliament and of the Council, of 25 November 2015, as amended by Regulation 2018/1971,¹ of the European Parliament and of the Council, of 11 December 2018, which includes new requirements for monitoring the price developments of regulated intra-EU communication services.

In order to assess the competitive developments in the Union-wide Intra-EU communications markets, BEREC has been tasked with regularly collecting data from national regulatory authorities on the development of retail charges for regulated Intra-EU communication services.

BEREC coordinates this process of data collection by pursuing the following objectives:

¹ Regulation (EU) 2018/1971 of the European Parliament and of the Council of 11 December 2018 <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:32018R1971&from=EN>.

- simplifying the process not only for NRAs, as BEREC acts as a central point for the data collection, but also for the European Commission (EC), as the data is received from a single source and follows a uniform data processing;
- coordinating the procedures of individual NRAs, as a single and commonly agreed upon, data collection model is used for the process, and it is synchronised and based on the same collection periods. BEREC consults the market players and the European Commission before finalising the data collection templates;
- providing, as far as possible, a common response to the different questions posed during the collection process by operators and NRAs, as BEREC serves as the forum where these questions are commonly debated and addressed.

The questionnaire on Intra-EU communications was sent to the NRAs on 25 March 2021. It included separate sheets for mobile and fixed networks and had to be completed by both mobile and fixed operators. For the purpose of the data collection, only mobile and fixed operators meeting the reporting threshold of at least 0.5% market share were invited to provide their data.

3. Regulatory evolution

Intra-EU communication caps apply from 15 May 2019. This means any retail price charged to consumers for regulated intra-EU communications² shall not exceed €0,19 (+ VAT) per minute for calls and €0,06 (+ VAT) per SMS message.

The EU has made efforts to reduce the prices of electronic communications between EU countries. One of the main achievements for the Digital Single Market was the end of roaming charges in 2017 and subsequently in 2019 the imposition of price caps on intra-EU communications services.

The regulation introducing intra-EU caps aims to ensure that these rules will not distort competition, innovation and investment. This means that NRAs may, in exceptional circumstances, grant a derogation from the price regulation of intra-EU communications. The derogation is intended for exceptional circumstances, where the application of the price-caps would significantly impact a provider's capacity to sustain its existing prices for domestic communications.

The price caps apply to mobile and fixed calls and SMS originated in the domestic country to another EU Member States plus Iceland, Liechtenstein and Norway. For calls and SMS originating in Norway, Iceland and Liechtenstein the rules are applicable from the date they are incorporated in the EEA agreement.

² Regulated Intra-EU communications means any number-based interpersonal communications service originating in the Member State of the consumer's domestic provider and terminating at any fixed or mobile number of the national numbering plan of another Member State, and which is charged wholly or partly based on actual consumption.

4. Main findings

Over 190 providers of international communications provided information for this Report. This number includes virtually³ all of the mobile and fixed network operators in the EEA countries, as well as a significant number of mobile virtual network operators (MVNOs) that provide EEA international communications services.

Consumption patterns of Intra-EU communication services

According to the data collected, the introduction of Intra EU communications regulation has not changed the international communication market substantially. The average international communication subscriber spent 39.74 minutes per month from fixed phone in Q2 and Q3 2020, while 42.88 minutes per month were spent in Q4 2020 and Q1 2021 (Figure 17). The average number of mobile calls originated in Q2 and Q3 2020 amounted to 12.87 minutes per month, while in Q4 2020 and Q1 2021 reached 12.55 minutes per month (Figure 18). On average 0.61 SMS were sent per month per Intra-EU subscriber in Q2 and Q3 2020, while 0.63 SMS per month were sent in Q4 2020 and Q1 2021 (Figure 19).

Intra-EU communication services: regulated and alternative tariffs

BEREC examined the percentage of subscribers using Intra-EU communication services with regulated prices (price caps) and alternative tariffs. The results show that around 7.33 % of fixed networks subscribers in Q2 and Q3 2020 used international communication services with regulated price and 6.72 % in Q4 2020 and Q1 2021 (Figure 1). Fixed alternative tariff plans including regulated international communication were not so popular – only 0.53 % of total fixed subscribers used alternative tariffs in Q2 and Q3 2020 and 0.54 % in Q4 2020 and Q1 2021 (Figure 3).

In the case of mobile networks, subscribers were more active using regulated tariffs. In Q2 and Q3 2020 13.94 % and in Q4 2020 and Q1 2021 13.21 % of total mobile subscribers benefited from the conditions of regulated international communications tariffs (Figure 2), while only 0.30 % of total mobile subscribers used alternative pricing provided by mobile network operators in Q2 and Q3 2020 and 0.33 % in Q4 2020 and Q1 2021, which is covered in this Report (Figure 4).

Intra-EU communication revenues per unit

With regard to revenues from international communications services with regulated price (Figure 11), the average revenues from fixed networks were approximately 0.03 EUR/min (excluding VAT) for the whole period under analysis. In addition, average revenues from fixed international communications services with alternative tariffs were 0.04 EUR/min for the whole period, which is covered in this Report (Figure 13), however it is needed to be noted that only few of the EU operators are offering such alternative plans for fixed network regulated international communications.

Regarding revenues per minute from mobile Intra-EU communication services, revenues from regulated tariffs amounted to 0.07 EUR/min for the whole period, which is covered in this Report (Figure 12). Revenues from alternative tariffs in contrast averaged at 0.04 EUR/min in Q2 and Q3 2020 and 0.04 EUR/min in Q4 2020 and Q1 2021 (Figure 14).

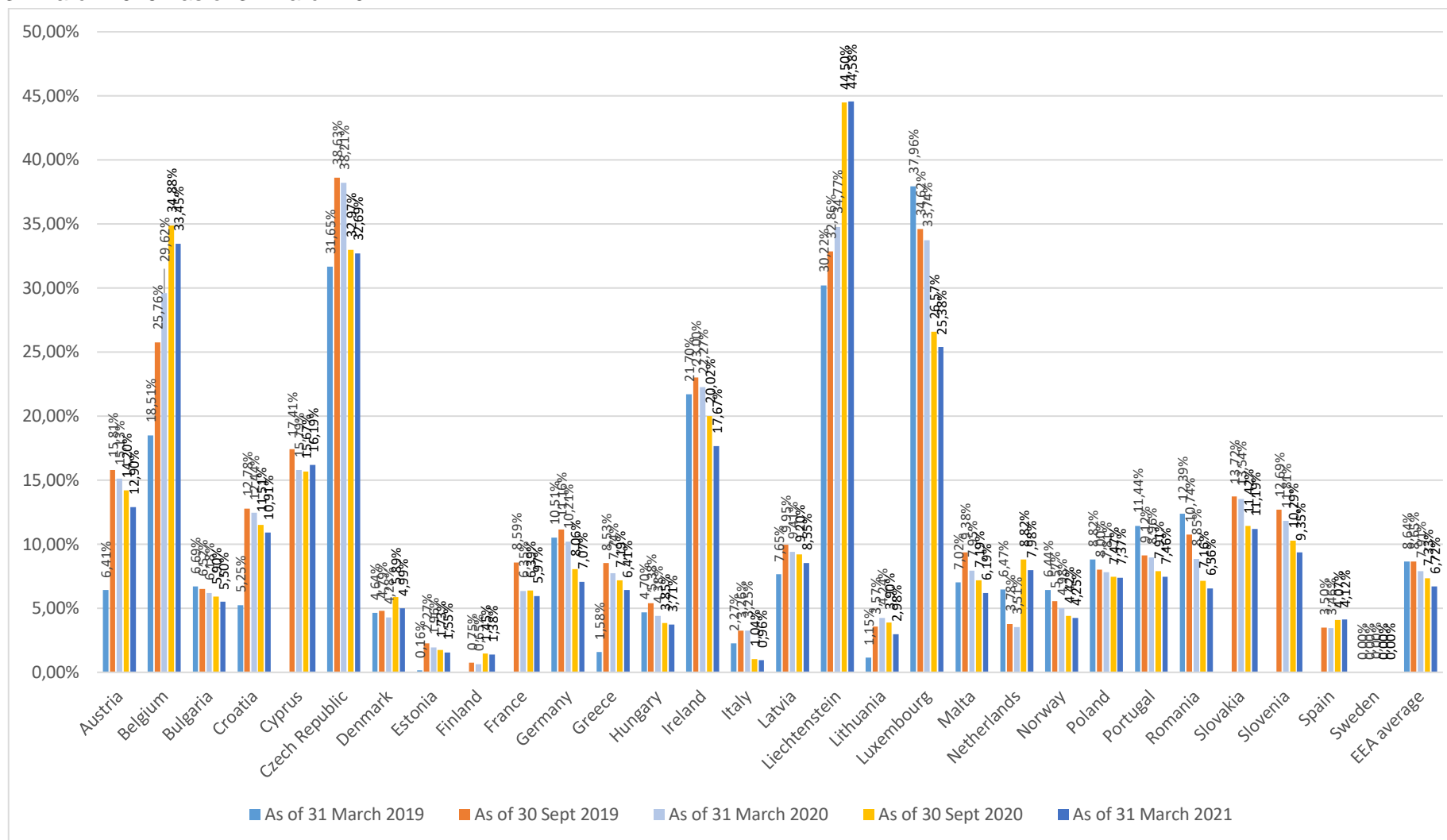
³ This number includes all mobile and fixed operators in the EEA countries (including MVNOs) that provide EEA international communications services and had at least 0.5% market share.

Finally, average revenues for SMS reached (Figure 15) 0.05 EUR/SMS for the whole period, which is covered in this Report while using regulated pricing policy, whereas alternative tariffs in Q2 and Q3 2020 generated 0.37 EUR/SMS and 0.35 EUR/SMS in Q4 2020 and Q1 2021 (Figure 16).

5. Charts

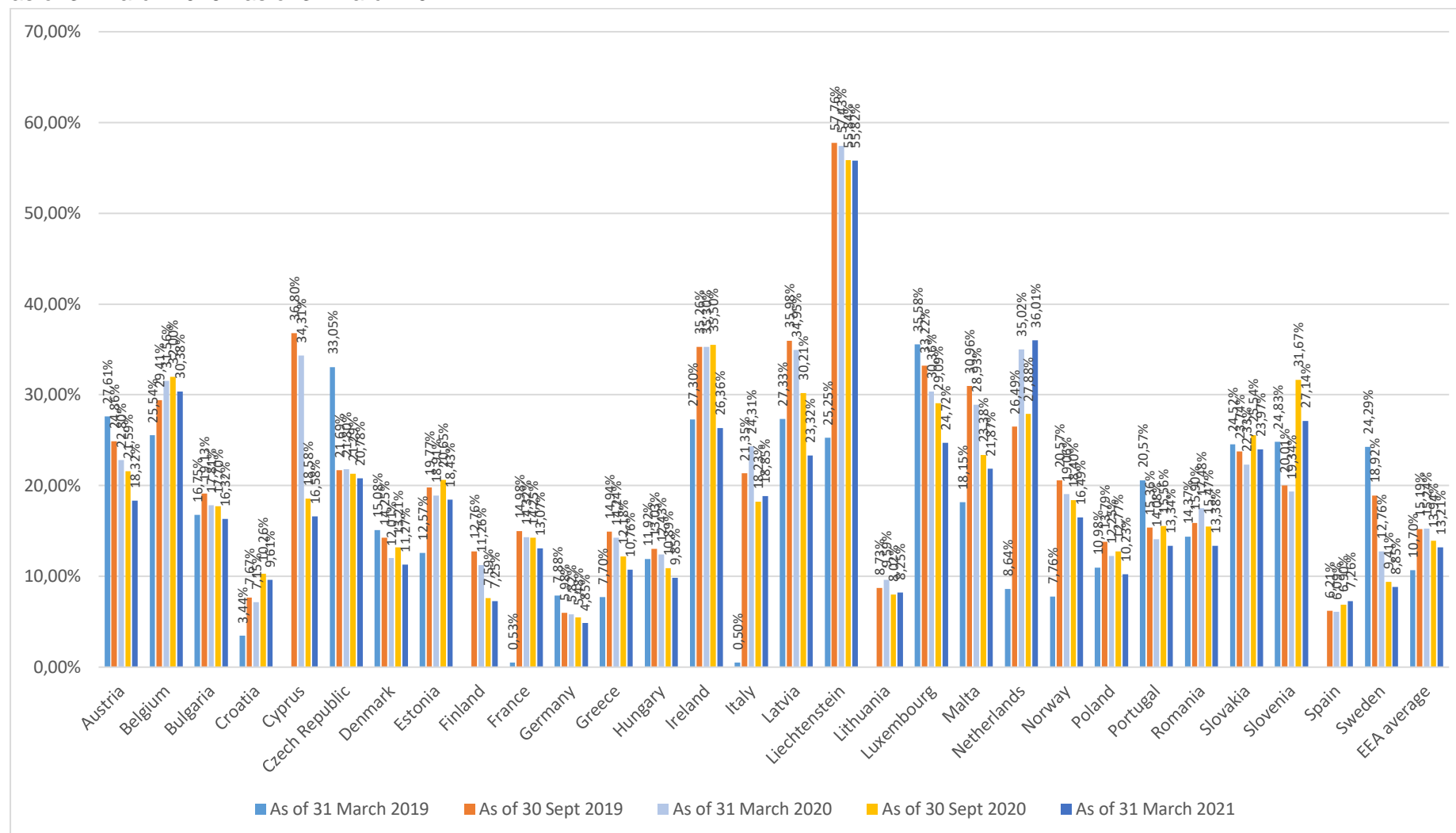
5.1. Analysis of fixed and mobile subscribers

Figure 1: Percentage of fixed subscribers that used intra-EU communications with regulated price from total number of active subscribers, as of 31 March 2019 - as of 31 March 2021.



During data collection period October 2018 – March 2019, operators were asked to include metered (per unit) tariffs for consumers in the “Regulated tariffs” indicator section in order to have comparable data.

Figure 2: Percentage of mobile subscribers that used intra-EU communications with regulated price from (vs) total number of active subscribers, as of 31 March 2019 - as of 31 March 2021.



During data collection period October 2018 – March 2019, operators were asked to include metered (per unit) tariffs for consumers in the “Regulated tariffs” indicator section in order to have comparable data.

Figure 3: Percentage of fixed subscribers that used intra-EU communications with alternative tariffs from (vs) total number of active subscribers, as of September 2020 and as of March 2021.

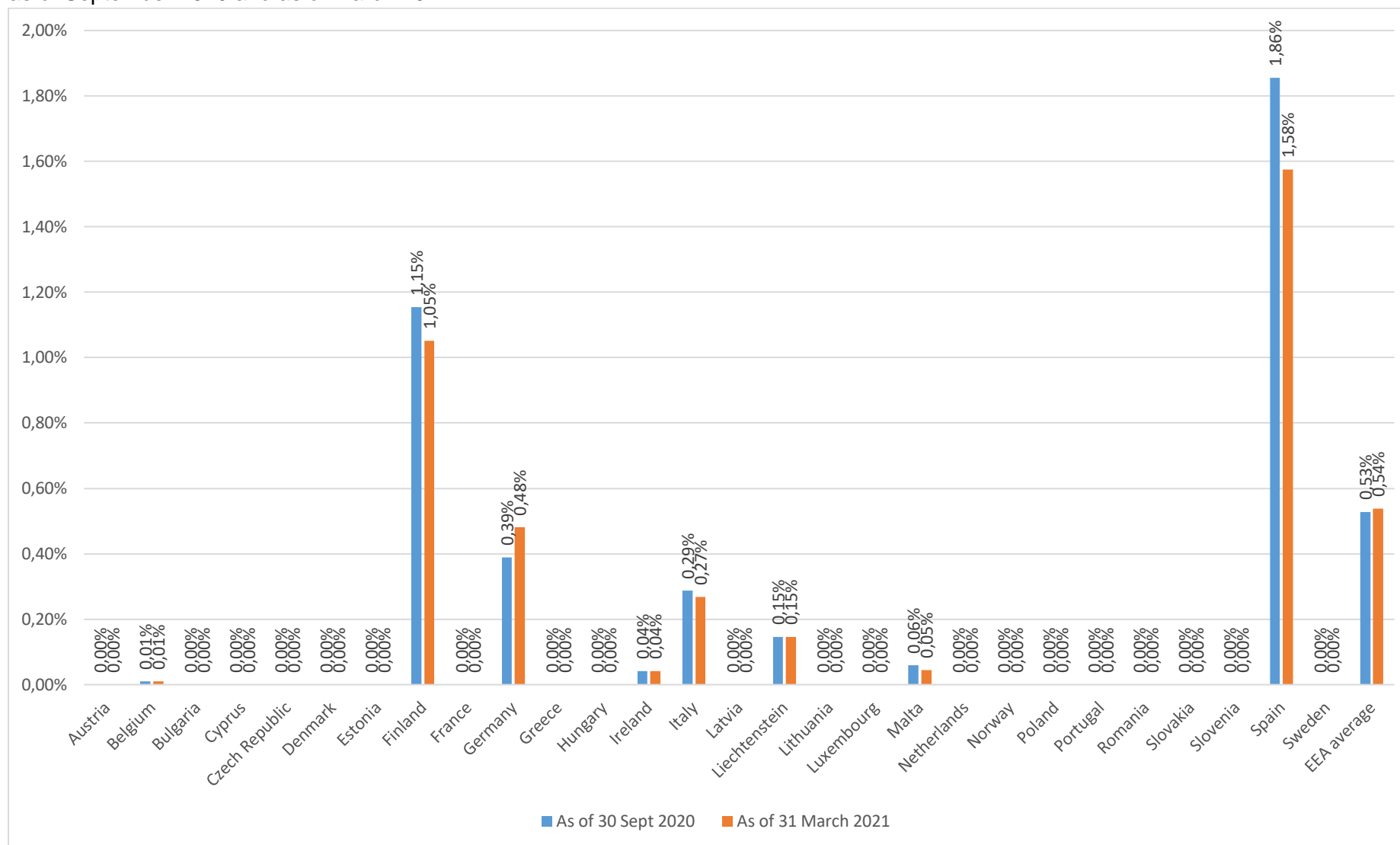
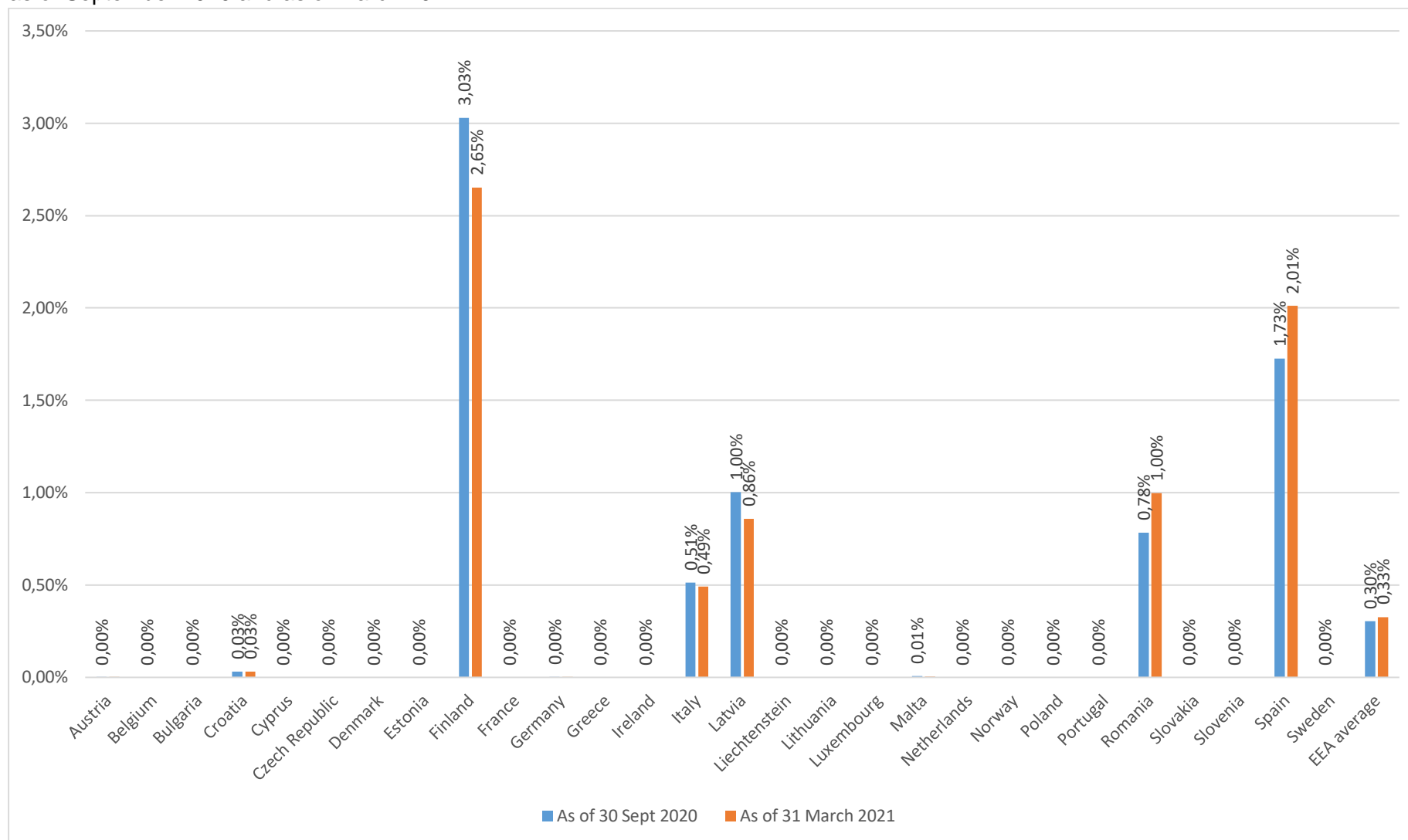


Figure 4: Percentage of mobile subscribers that used intra-EU communications with alternative tariffs from (vs) total number of active subscribers, as of September 2020 and as of March 2021.



Hungary confidential.

5.2. Volumes of Intra-EU communications services

5.2.1. Volumes of fixed and mobile voices

Figure 5: Fixed intra-EU minutes originated by consumers compared to total intra-EU minutes originated by consumers and businesses, in percent, 1 October 2018 – 31 March 2021.

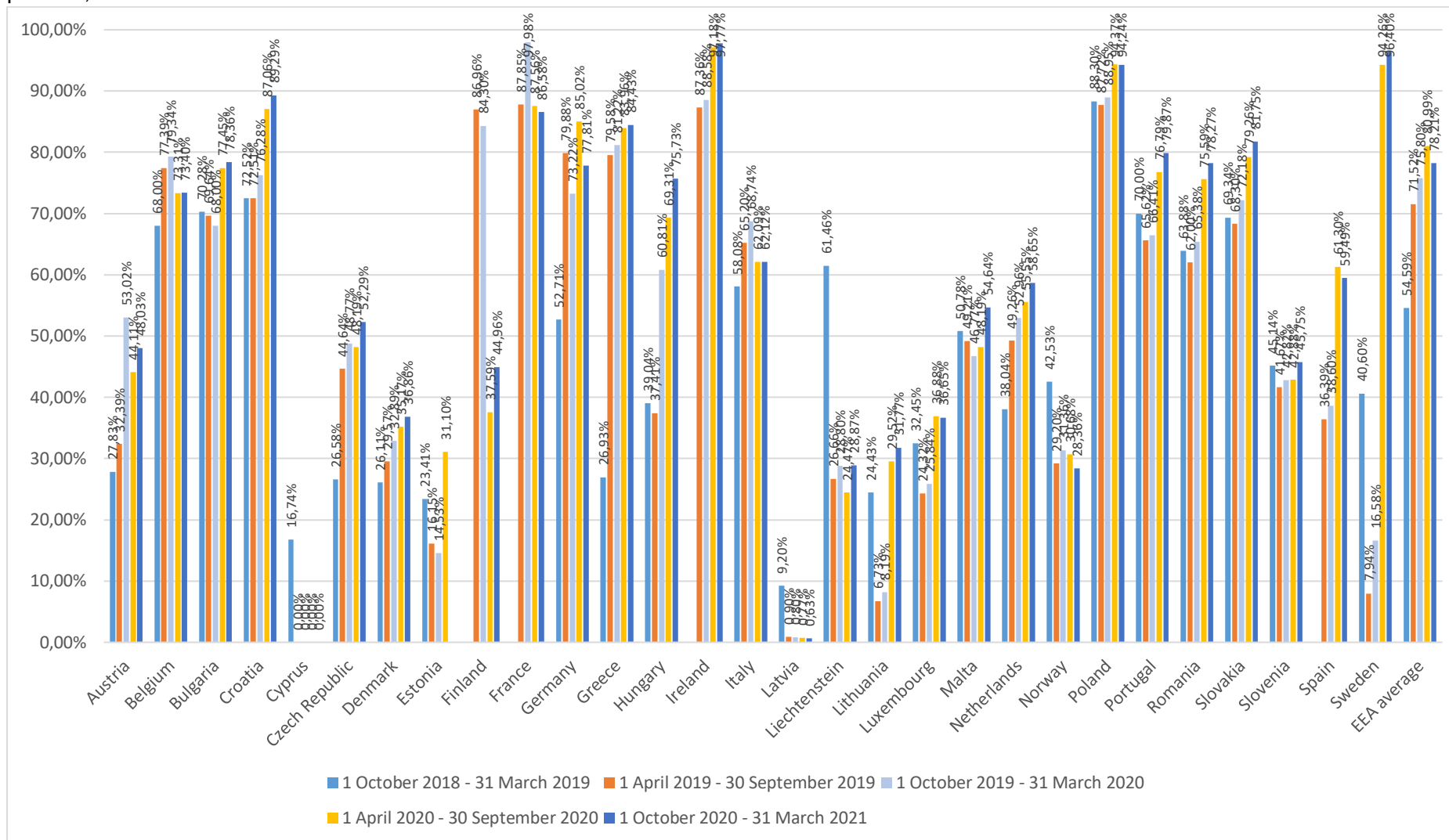


Figure 6: Mobile intra-EU minutes originated by consumers compared to total intra-EU minutes originated by consumers and businesses, in percent, 1 October 2018 – 31 March 2021.

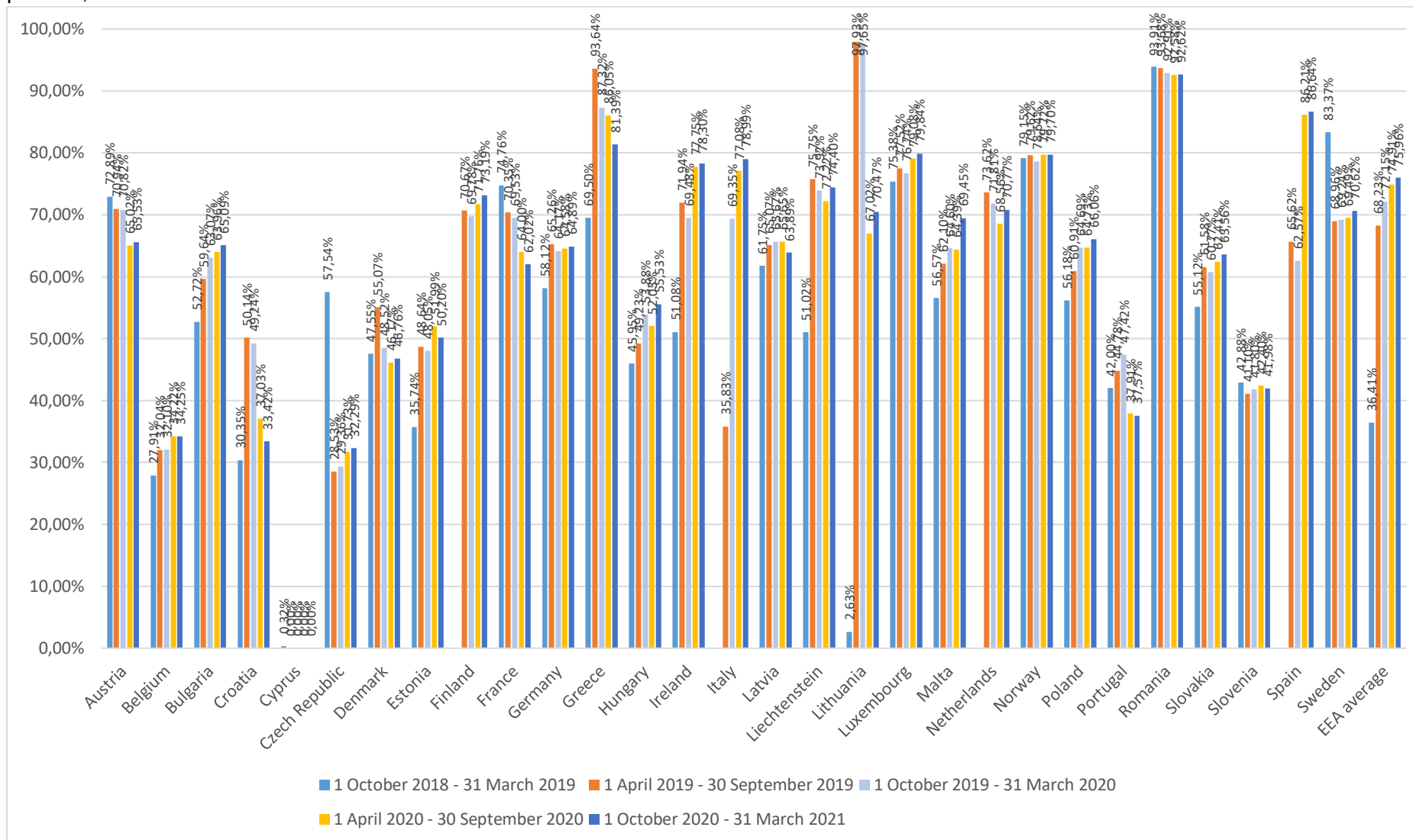


Figure 7: Percentage of fixed price regulated intra-EU minutes (vs) total intra-EU minutes (for consumers only), 1 October 2018 – 31 March 2021.

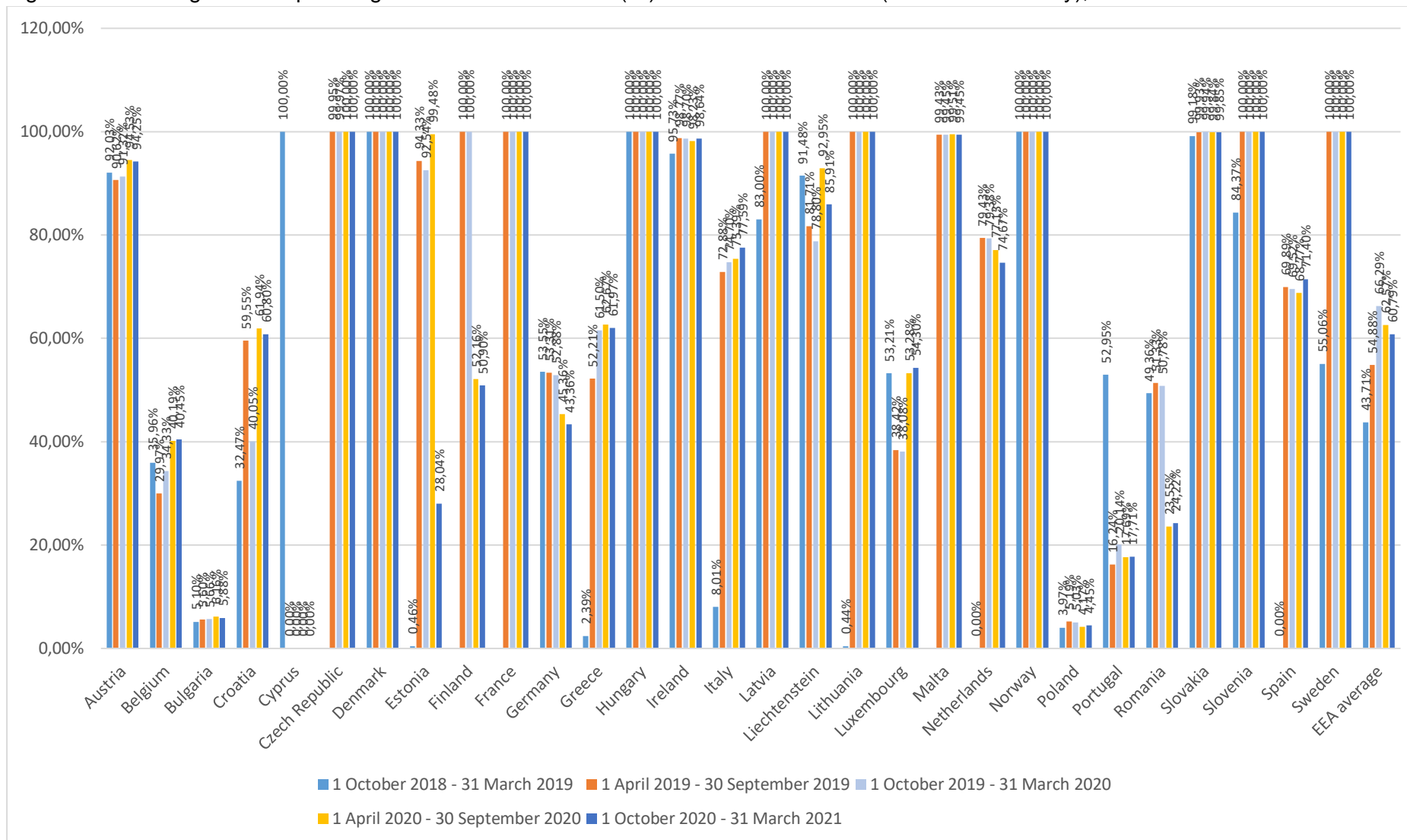
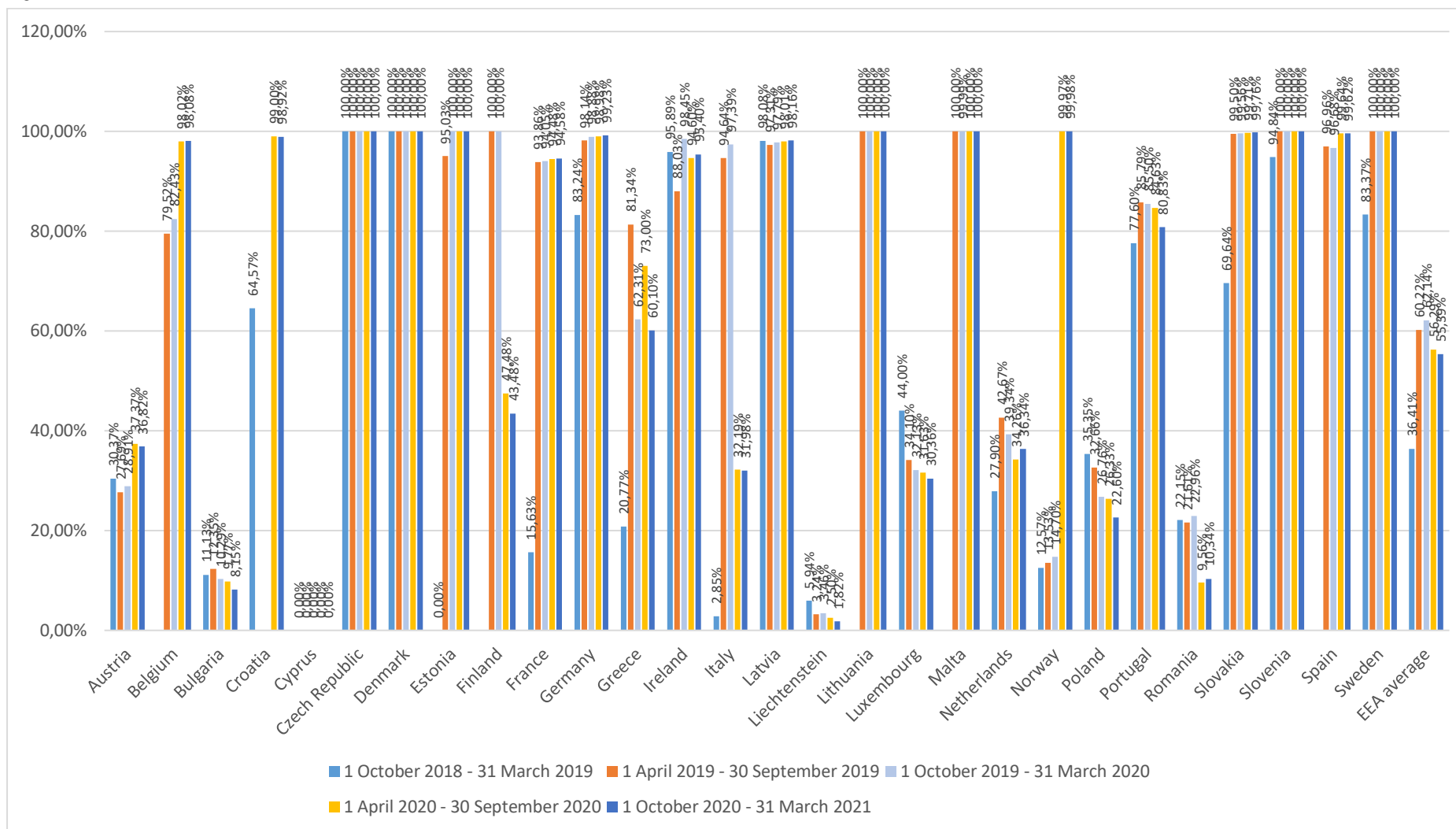


Figure 8: Percentage of mobile price regulated intra-EU minutes (vs) total intra-EU minutes (for consumers only), 1 October 2018 – 31 March 2021.



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5.2.2. Volumes of SMS

Figure 9: Percentage of SMS sent by consumers from (vs) total originated intra-EU SMS (consumers + business), 1 October 2018 – 31 March 2021.

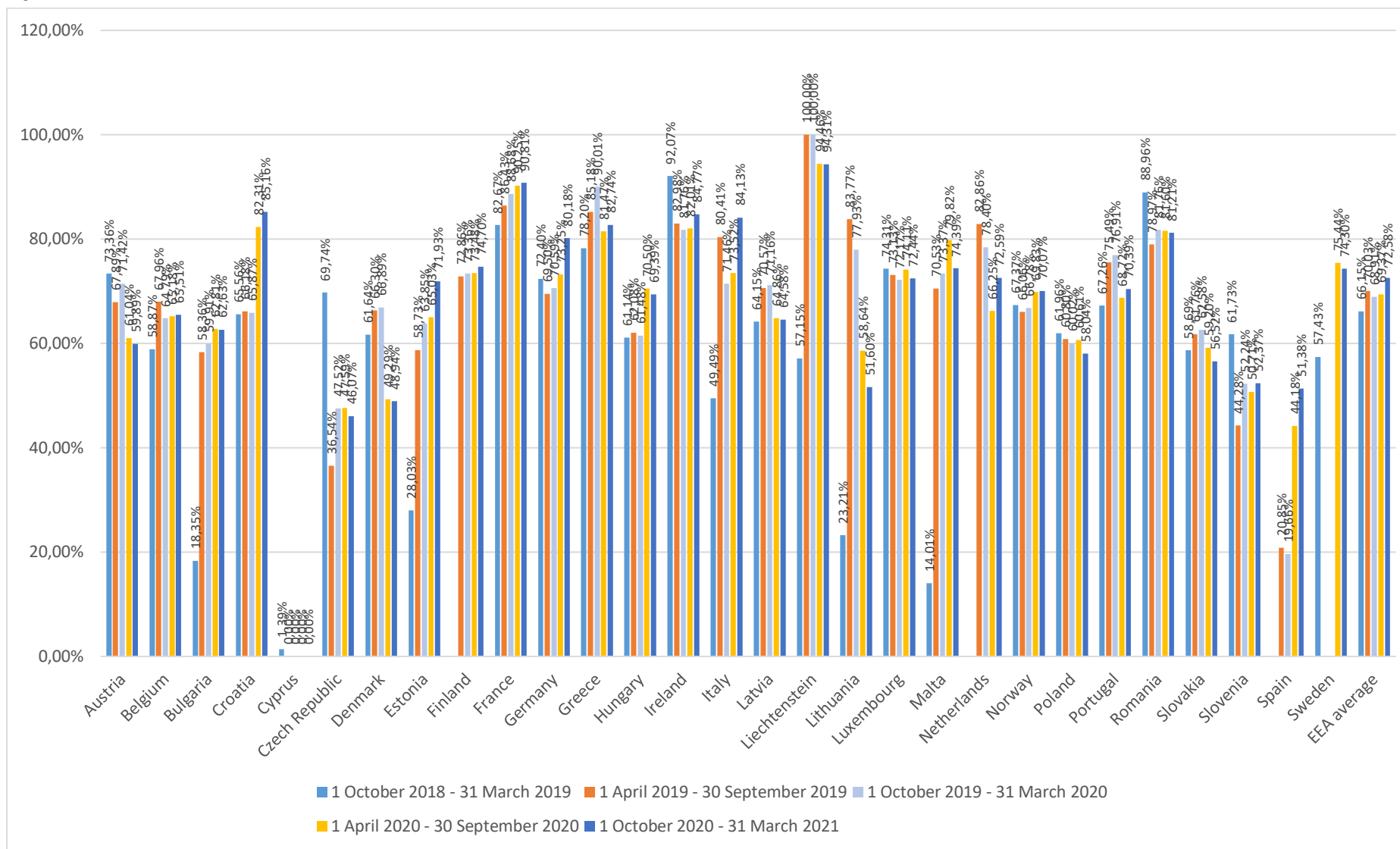
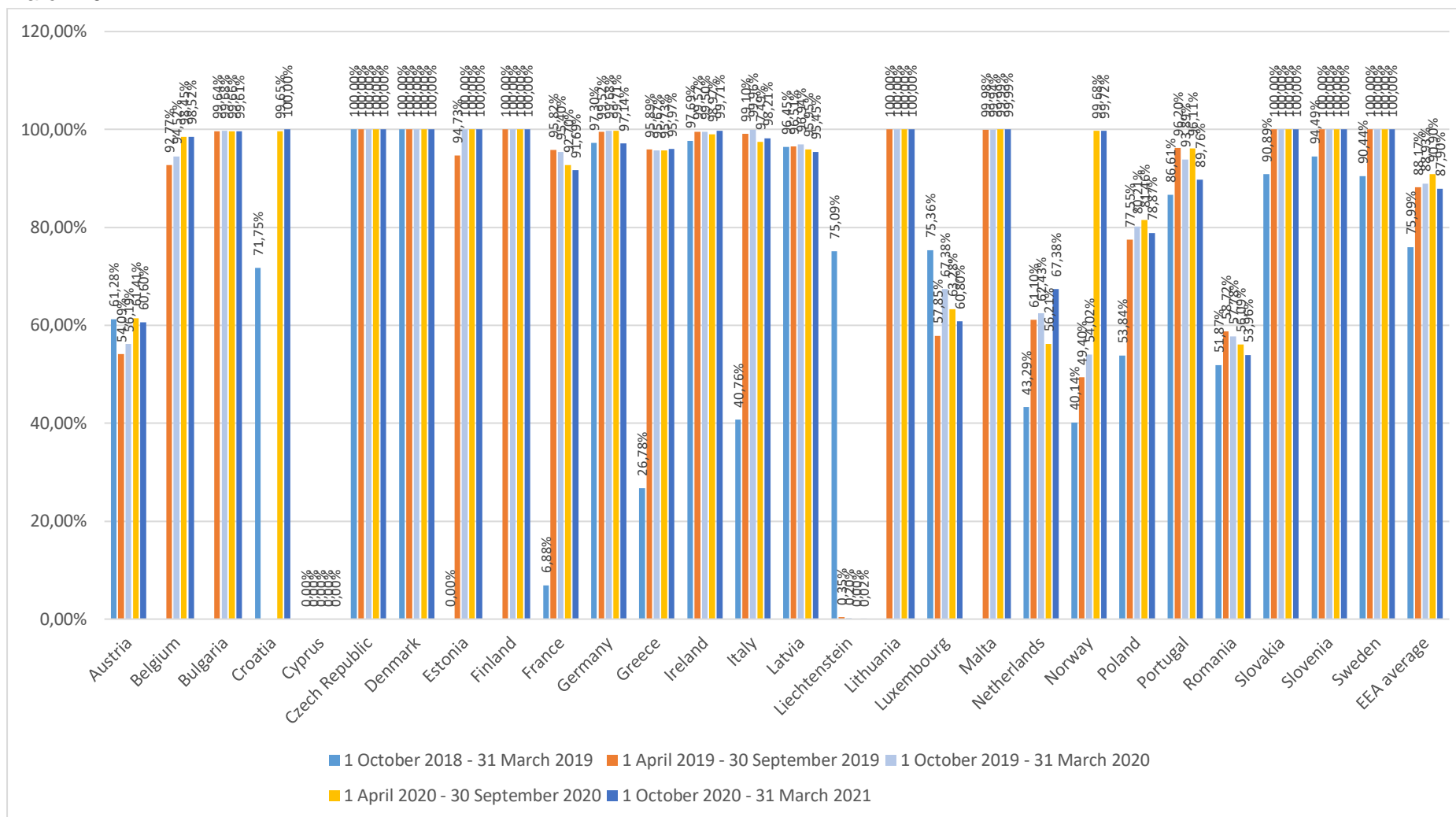


Figure 10: Percentage of price regulated intra-EU communications (vs) total originated intra-EU SMS (consumers only), 1 October 2018 – 31 March 2021.

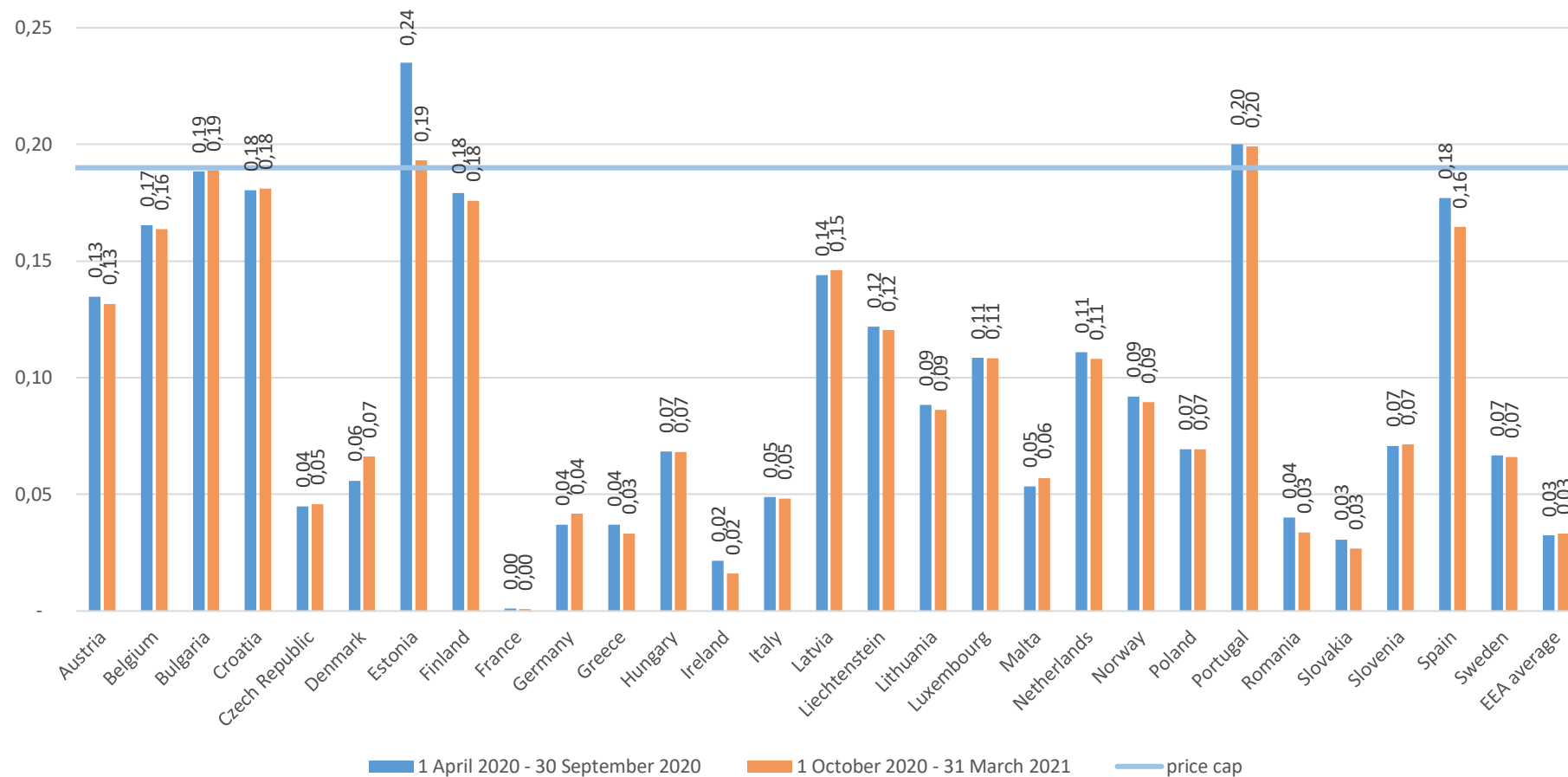


Hungary confidential.
EEA average excludes: Spain

5.3. Revenues per unit of Intra-EU communication services

5.3.1. Revenues of fixed and mobile voices

Figure 11: Revenues (in EUR) per fixed min for price regulated intra-EU calls, 1 April 2020 – 30 September 2020 and 1 October 2020 – 31 March 2021.



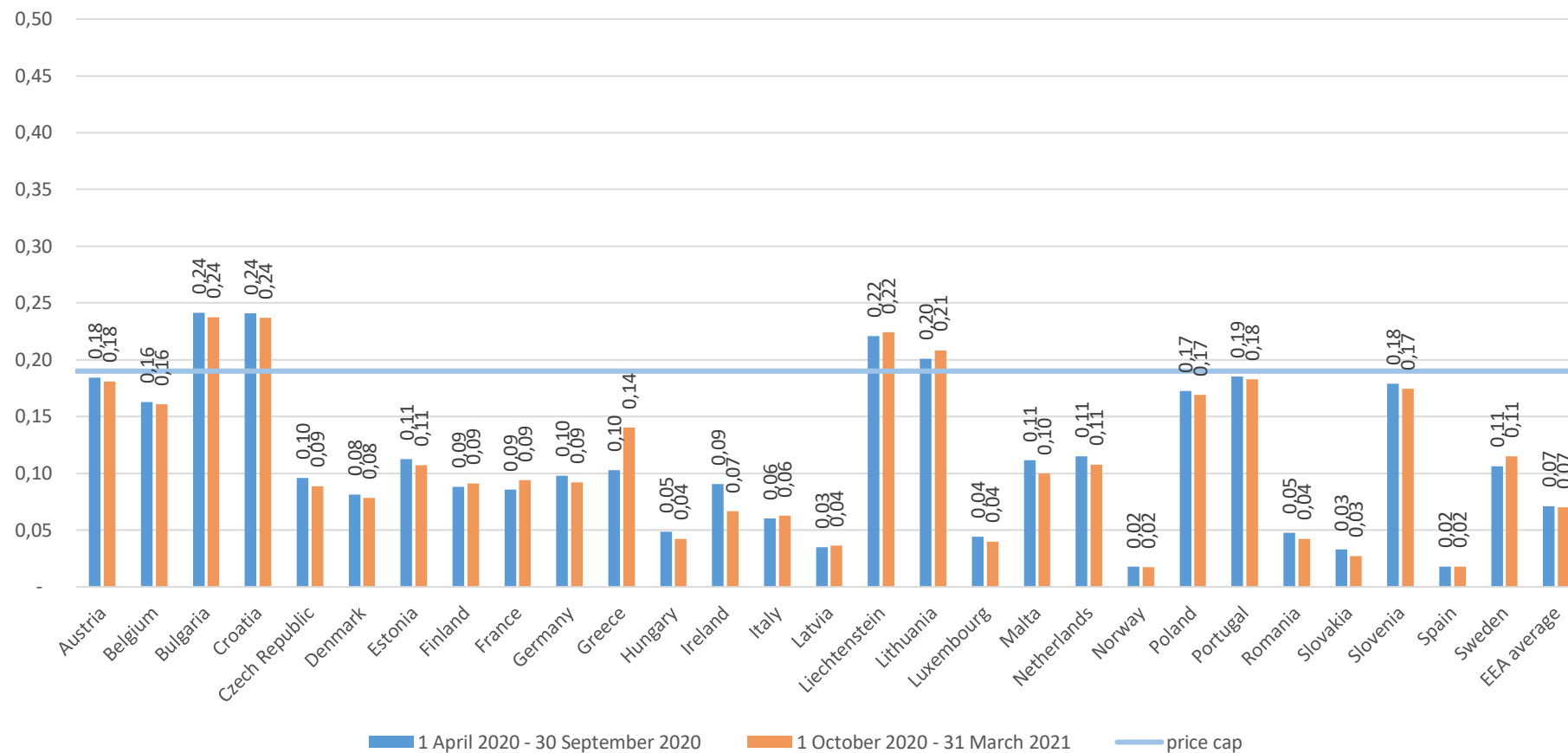
Regulated Intra-EU communications only refer to communications which are wholly or partly based on actual consumption.

Price cap discrepancies happens due to different volumes of actual and billed minutes.

Portugal: The aggregated average price is higher than the price cap due to one MNO that has considered actual minutes instead of billed minutes in the situations in which they charge 1 minute in the first minute even if the call duration is less than 1 minute. For that reason, their traffic is lower resulting in an increase of the ratio "revenues per minute".

Due to technical constraints, it is expected that this operator will only be able to review their answer next year.

Figure 12: Revenues (in EUR) per mobile min for price regulated intra-EU calls, 1 April 2020 – 30 September 2020 and 1 October 2020 – 31 March 2021.

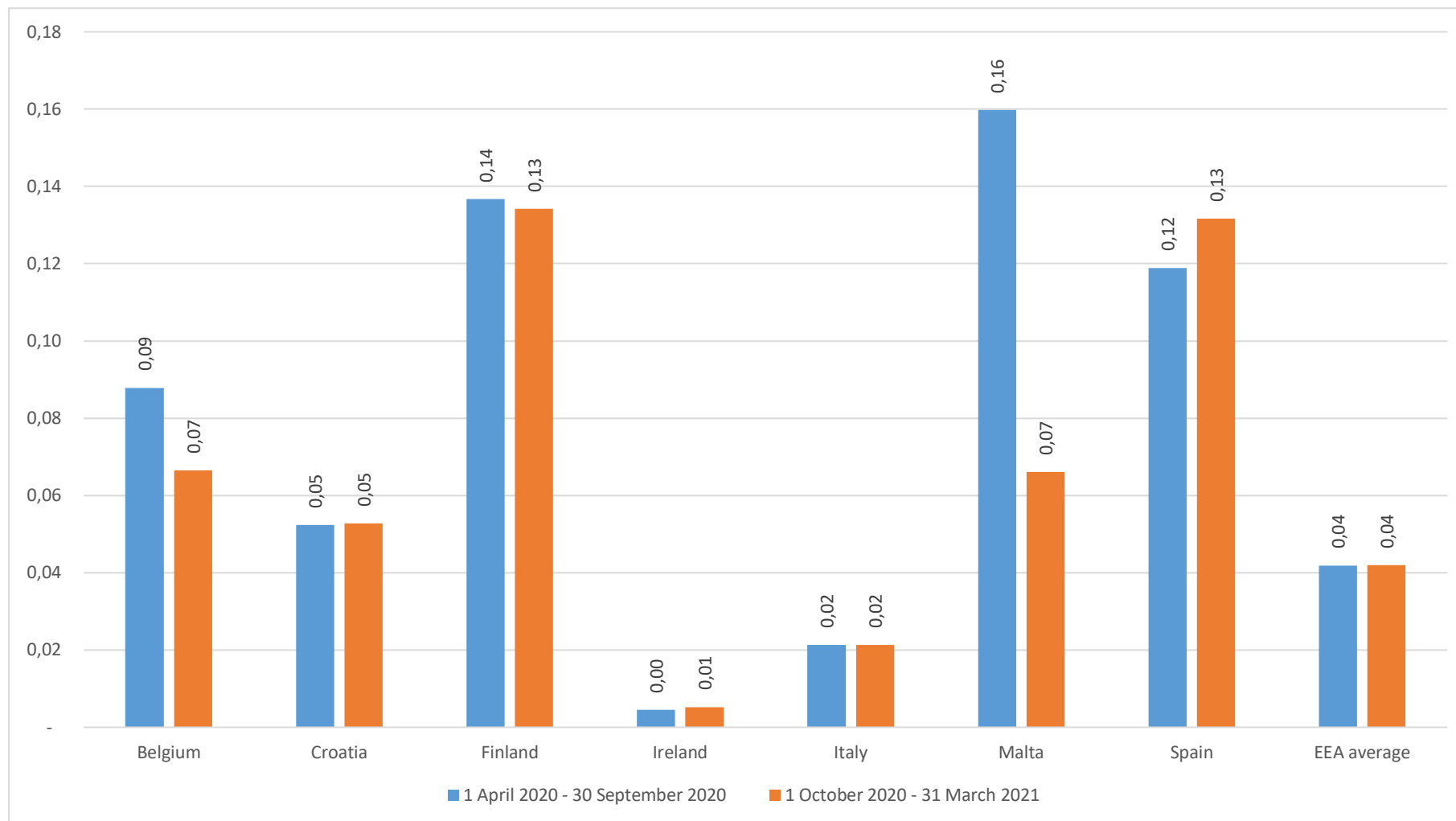


Regulated Intra-EU communications only refer to communications which are wholly or partly based on actual consumption.

Price cap discrepancies happens due to different volumes of actual and billed minutes.

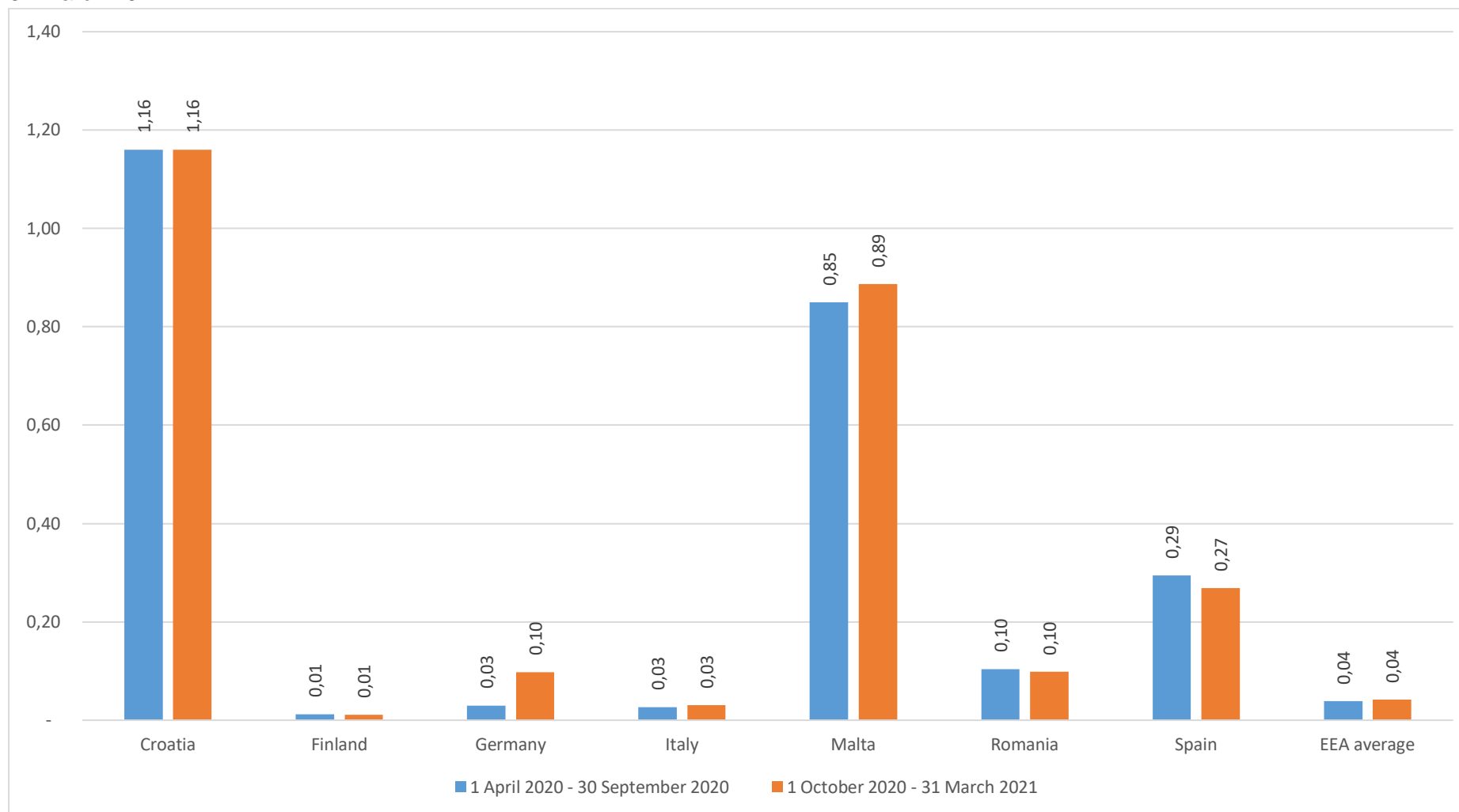
Bulgaria, Liechtenstein: the calculated average prices are above the price cap because of the different volumes of actual and billed minutes. The questionnaire asks operators to provide actual minutes while the revenues are naturally formed from the billed minutes. As the first charging interval is more than 1 second (the most applied is 60 s. interval), the billed minutes are more than the actual minutes. This is the reason why the calculated average price is above the price cap (operators apply the maximum retail price for Intra EEA calls made – 0.19 EUR per min).

Figure 13: Revenues (in EUR) per fixed min for intra-EU calls from alternative tariffs, 1 April 2020 – 30 September 2020 and 1 October 2020 – 31 March 2021.



Only few of the EU operators are offering alternative plans for fixed network regulated international communications.

Figure 14: Revenues (in EUR) per mobile min for intra-EU calls from alternative tariffs, 1 April 2020 – 30 September 2020 and 1 October 2020 – 31 March 2021.



Hungary confidential.

Only few of the EU operators are offering alternative plans for mobile network regulated international communications.

5.3.2. SMS revenues

Figure 15: Revenues per SMS for price regulated intra-EU messages, 1 April 2020 – 30 September 2020 and 1 October 2020 – 31 March 2021.

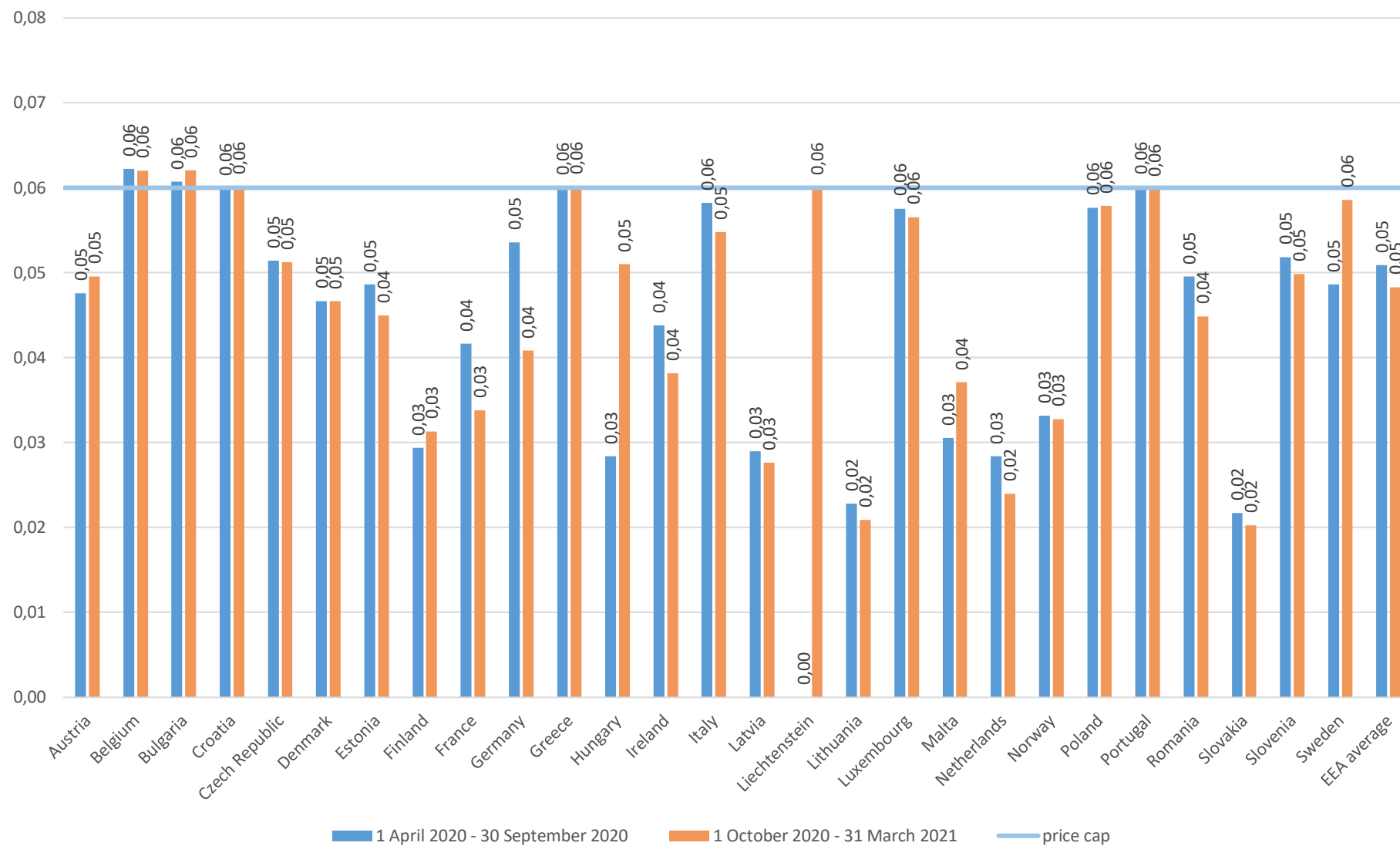
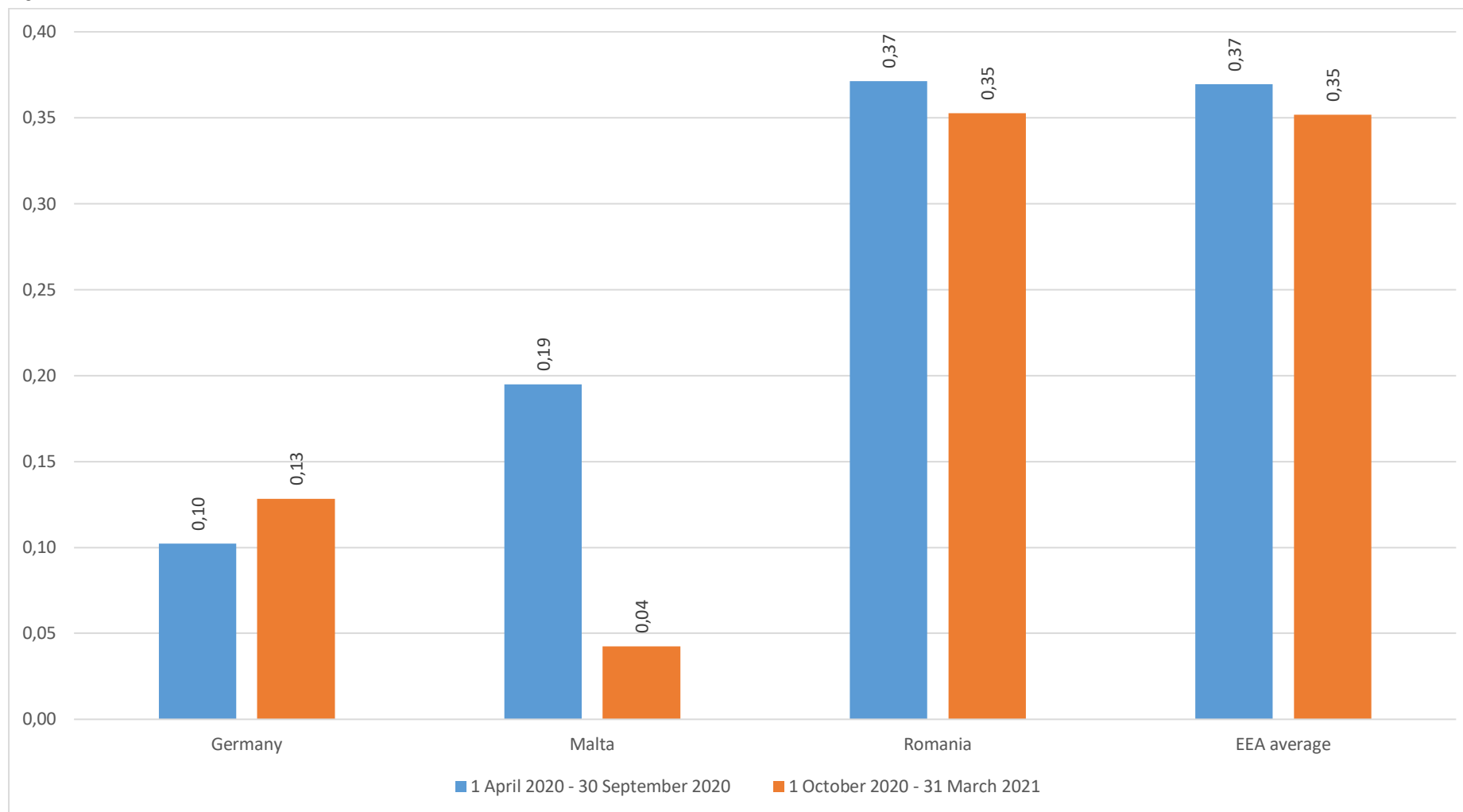


Figure 16: Revenues per SMS for intra-EU messages from alternative tariffs, 1 April 2020 – 30 September 2020 and 1 October 2020 – 31 March 2021.



Only few of the EU operators are offering alternative plans for mobile network regulated international communications.

5.4. Consumption patterns (fixed, mobile voice and SMS)

Figure 17: Average number of fixed Intra-EU minutes per month per subscriber (subscribers that used Intra-EU communications services), 1 October 2018 – 31 March 2021.

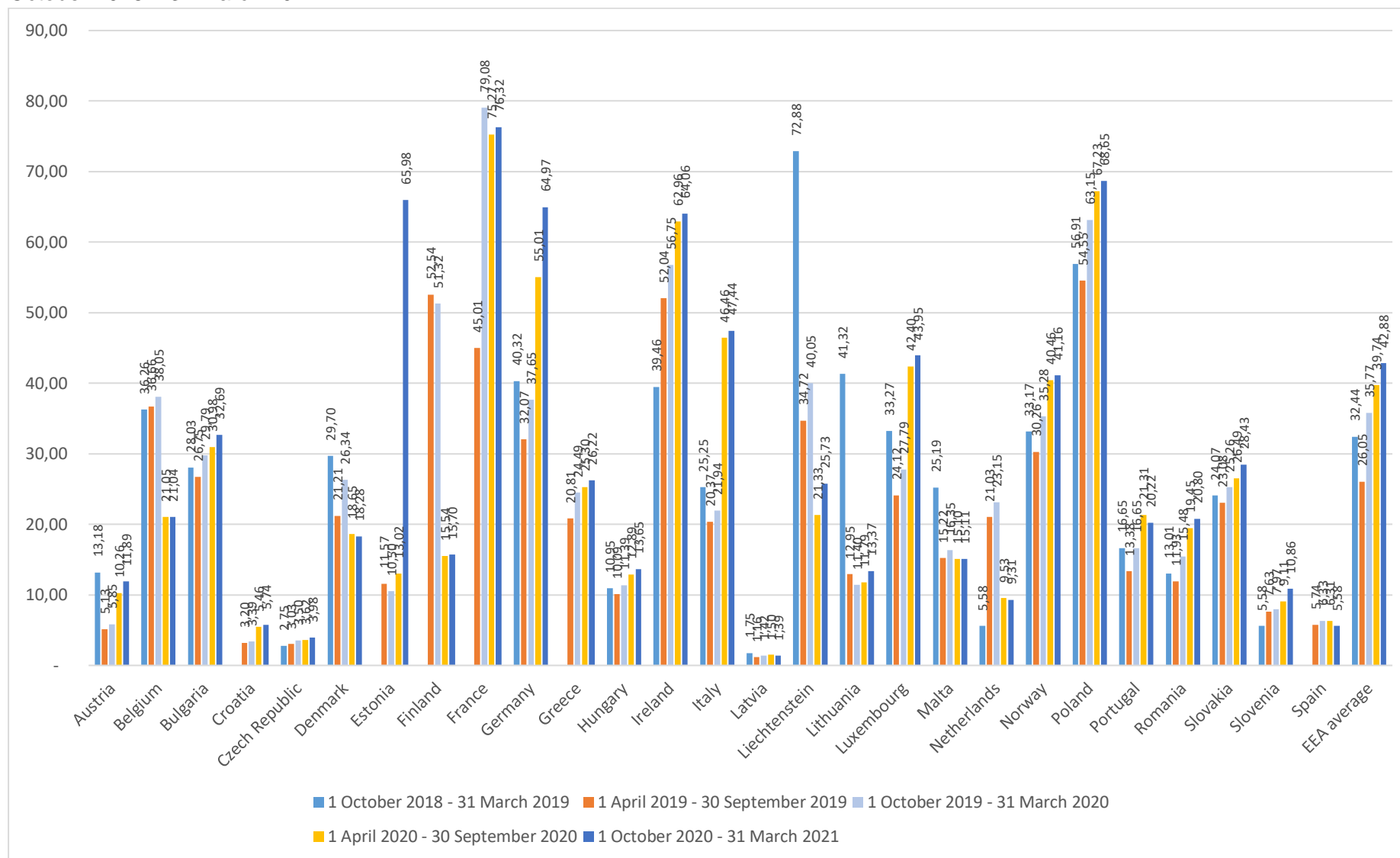


Figure 18: Average number of mobile Intra-EU minutes per month per subscriber (subscribers that used Intra-EU communications services), 1 October 2018 – 31 March 2021.

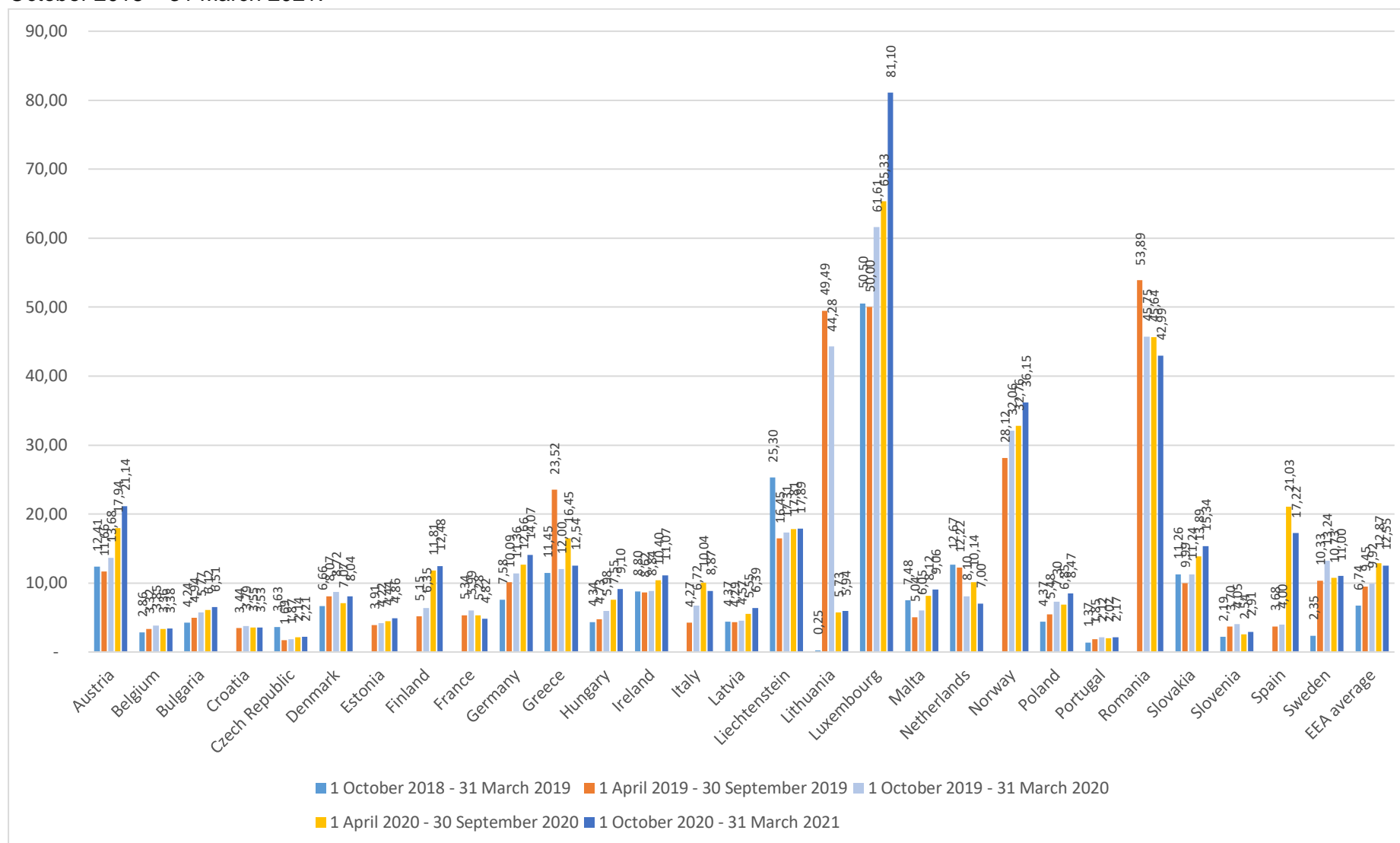
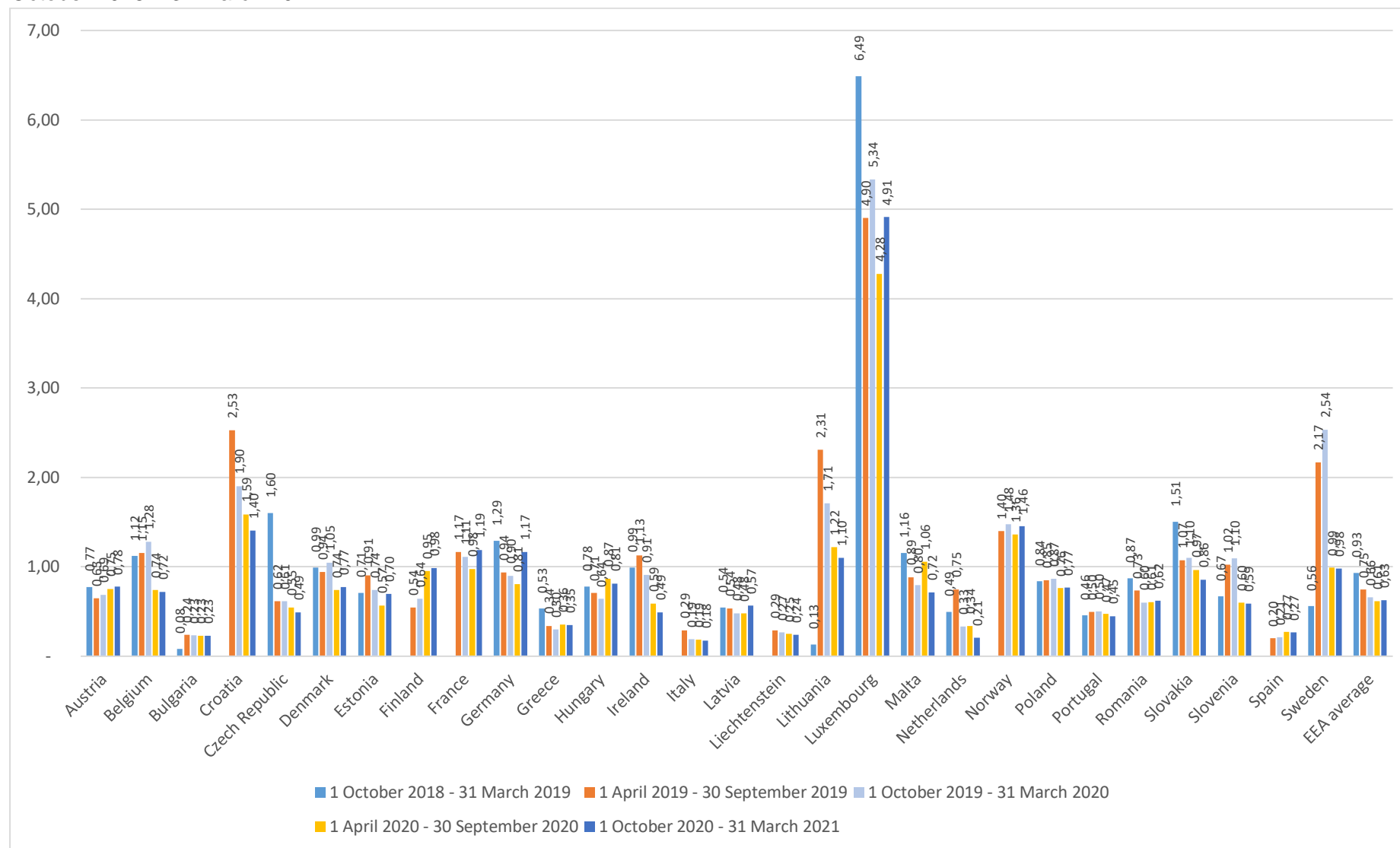


Figure 19: Average number of mobile Intra-EU SMS per month per subscriber (subscribers that used Intra-EU communications services), 1 October 2018 – 31 March 2021.



Annex I: Methodology for the data collection

A limited number of operators have opted for not supplying the data relative to indicators in questionnaire. This is not at all unusual for a comprehensive data collection of this type. In most cases, the NRA was able to work with each company to resolve or alleviate the problem. In other cases, where system upgrades are necessary to comply with the new format of the data collection, the operator was asked to provide the best possible estimate currently available and to complete upgrades in time to provide high quality data for the next data collection. Some NRAs expressed major data quality challenges at the national operators' level as well as the use of different reporting systems by operators.

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

All retail prices included in the charts exclude VAT. They are an average of prices paid by postpaid and prepaid tariff plan customers.

The Intra-EU communications Regulation also applies to the EEA EFTA States Norway, Iceland and Liechtenstein. For calls and SMS originating in Norway, Iceland and Liechtenstein the rules are applicable from the date they are incorporated in the EEA agreement and this Report includes indicators from Norway and Liechtenstein.

Annex II: List of respondents

Operators that provided data for the period 1 April 2020 – 31 March 2021:

Austria

A1 Telekom Austria
 AGMS Austria
 ASK4 Austria
 Citycom Telekommunikation
 Colt Technology Services Austria
 Finarea
 HoT Telekom
 Hutchison 3G Austria
 IKB Innsbrucker Kommunalbetriebe
 ITNS
 Kabelplus
 LINZ STROM GAS WÄRME GmbH
 LIWEST
 LTK
 Lycamobile Austria
 Mass Response
 MTEL
 OJA.at
 Onoffapp OÜ
 Orange
 Porsche Smart Mobility
 Riepert Informationstechnologie
 RTK
 Russmedia
 Salzburg AG
 Smartspace
 T-Mobile Austria
 Vectone Mobile Austria
 Vodafone Enterprises Austria
 Voxbone

Belgium

Proximus
 Telenet Group
 Orange Belgium

Bulgaria

Bulgarian Telecommunication Company
 (Vivacom)
 Telenor Bulgaria
 A1 Bulgaria
 Coolbox

Croatia

Hrvatski Telekom
 A1 Hrvatska
 Tele2

Cyprus

Cablenet
 Cyta
 Epic
 Primetel

Czech Republic

Ceteris
 ČEZ Prodej
 Dial Telecom

 MiniTel
 Nej.cz
 Nordic Telecom
 O2 Family
 O2 Czech Republic
 SAZKA
 Tesco Mobile ČR
 T-Mobile Czech Republic
 Vodafone Czech Republic

Denmark

Hi3G Denmark
 TDC
 Telenor
 TeliaDanmark

Estonia

AS EMT
 Elisa Eesti
 OÜ Top Connect
 TELE 2 Eesti

Finland

Ålands Telekommunikation
 DNA
 Elisa Corporation

Telia Finland
European Mobile Operator (MOI)

France

EI Telecom
Lycamobile
Orange Caraïbe
Orange France
SFR
SRR

Germany

Telekom Deutschland GmbH
Telefónica Germany GmbH & Co. OHG
Vodafone GmbH

Greece

COSMOTE
Vodafone Panafon
Wind HellasTelecommunications
Forthnet

Hungary

Telenor Magyarország Zrt.
Magyar Telekom Nyrt.
Vodafone Magyarország Zrt.
Digi Kft.
Tarr Kft.
Invitel Zrt.
PR Telekom Zrt.
Vidanet Zrt.

Ireland

Eircom Limited
Hutchison 3G Ireland
Tesco Mobile Ireland
Vodafone Ireland

Italy

Digi Italy
ERG Mobile
Fastweb
Tre
Lycamobile
Poste Mobile
Tim
Tiscali
Vodafone

Wind

Latvia

Bite Latvia
Latvijas Mobilais Telefons
Tele2

Liechtenstein

Hoi Internet
Li-life web+it
Salt (Liechtenstein)
Speedcom
Supranet
Swisscom (Schweiz)
Telecom Liechtenstein
TV-COM
Vestra ICT
Voxphone

Lithuania

Bite Lietuva
Eurocom
Telia Lietuva
Tele2
Teledema

Luxembourg

POST
Proximus Luxembourg
Orange Communications Luxembourg

Malta

Melita Mobile,
Mobisile Communications (GO Mobile)
Epic Communications Ltd

Netherlands

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

Norway

Ice
Lycamobile
Telenor

Telia Norge

Poland

Lycamobile
Multimedia Polska
Netia
Orange Polska
P4
Polkomtel
T-Mobile Polska
Telego
Telestrada
Vectra
Virgin Mobile
UPC Polska

Portugal

NOS Comunicações, S.A
MEO – Serviços de Comunicações e Multimédia, S.A.
Vodafone Portugal – Comunicações Pessoais, S.A.
NOWO Communications, S.A
NOS Açores Comunicações, S.A.
NOS Madeira Comunicações, S.A.
Lycamobile Portugal, Lda

Romania

Nextgen Communications
Orange Romania
RCS&RDS
Vodafone Romania
Telekom Romania Communications
Telekom Romania Mobile Communications

Slovak Republic

O2 Slovakia
Orange Slovensko
Slovak Telekom
SWAN Mobile

Slovenia

TELEKOM SLOVENIJE, D.D.
A1 Slovenija d.d.
TELEMACH D.O.O.
T-2 d.o.o.
IZI mobil, d.d.

HOT mobil, telekomunikacije in storitve d.o.o.

Mega M d.o.o.
SoftNET d.o.o.

Spain

Digi Spain Telecom, S.L.
Euskaltel, S.A.
Orange Espagne, S.A. Unipersonal
Orange España Virtual, S.L.U.
Pepemobile, S.L.
R Cable y Telecable Telecomunicaciones, S.A.U.
Telefónica de España, S.A.U.
Telefónica Móviles de España, S.A. Unipersonal
Vodafone Enabler España, S.L.
Vodafone España, S.A. Unipersonal
Vodafone ONO, S.A.U.
Xfera Móviles, S.A. Unipersonal

Sweden

Hi3G Access
Telenor Sverige
Telia Company
Tele2 Sverige