



**Hellenic Telecommunications Organisation (OTE)**  
**Response to the European Commission Public Consultation**  
**'Post-i2010: priorities for new strategy for European information society (2010-2015)'**

The Hellenic Telecommunications Organisation (OTE)<sup>1</sup> is pleased to contribute to the ongoing discussion on the future priorities for the European information society. OTE is increasingly committed to engagement with European policy makers, as demonstrated by our continued dialogue with the EU institutions. We welcome this opportunity to set out our strategic thinking at this key milestone for European 'digital policy'.

More specifically, we welcome both this initiative of the Commission to give greater accessibility to European citizens, and the freedom afforded to business and other organisations to express their positions in more depth. However, we would like to point out that the "tick-boxes" approach of the questionnaire could be misleading, as is the case in a number of questions. In such cases, supplementary comments in writing should be carefully considered and results based solely on "machine-generated" statistics should be avoided, or at least explained.

In order to best represent our views on the range of questions asked by the Commission, we have chosen to respond both in written form and by completing the Commission's multiple choice on-line questionnaire. Our response seeks to focus primarily on OTE's experiences and challenges in Greece and the lessons that can be learned by the Commission.

**ICT for a growth and jobs agenda**

OTE strongly believes that ICT policy needs to be mainstreamed into the development of all relevant EU policy through enhanced coordination between different services of the Commission and greater cooperation between the European Institutions. ICT policy should not stand separately from policies on ageing, energy efficiency and climate change, but should be closely integrated into development of all of these policy streams.

**ICT for a sustainable 'low carbon' economy**

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<sup>1</sup> OTE Group is the largest integrated telecom services provider in South-East Europe. Besides Greece, it operates in Romania, Bulgaria, and Albania and has an important stake in Telecom Serbia. It employs about 30,000 people and had an annual turnover in 2008 of €6.4 billion, of which approximately three-quarters was accumulated in Greece. In both Greece and Romania, OTE and Romtelecom (its Romanian counterpart) have obligations of universal service, play important roles in the economies of their countries and are major investors, employers and development engines for market liberalization and local loop unbundling. Telecom markets were opened to competition in Greece in 2001 and in Romania in 2003. Since 2004, the Group has embarked on a transformation effort focused on cost reduction, improvement in quality of service and broadband penetration. Above all, in changing the culture and procedures of former state monopolies adapting it to the necessities of operating in the competitive private sector. In 2008, an agreement was signed between the Greek Government and Deutsche Telekom concerning OTE. Deutsche Telekom has become a significant shareholder in OTE with a 30% stake alongside the Greek State.



Whilst acknowledging that the telecommunications industry does not have a huge direct impact on the environment compared to other European industries, OTE believes that telecoms companies can make a substantial contribution to the goal of a sustainable 'low carbon' economy, both through leading with strong positive examples for the industry and for its employees, and by facilitating technological advances for other industries. We feel that best-practice sharing and education remain fundamental tools in stimulating environmentally responsible behavior by European industry. OTE would also support fiscal incentives for positive environmental action by industry, to encourage greater corporate social responsibility.

OTE launched a few years ago a systematic and gradual effort to record its environmental footprint, as a first step for future initiatives on reducing its impact on the environment. OTE's current efforts consist of a range of measures including the use of renewable energy sources, adoption of energy-saving practices, and the reduction of its greenhouse gas emissions.

### **Creating a 100% connected society and economy through a high-speed and open internet for all**

OTE is committed to an accelerated deployment of new networks with the aim of fostering e-inclusion and bridging the digital divide in Greece and its regional footprint, and its strategy remains focused on continuing the fast pace of broadband development. There is no doubt that for European consumers and businesses, higher broadband speeds will bring immediate benefits, allowing new innovative services and business models to develop, in particular in fields such as healthcare, education, security, e-government, e-commerce and assistance to the elderly.

OTE believes that, in order to spur the development of high-speed networks and promote Internet use, public policy should focus on the following priorities:

- Market economy investor principles should not be distorted.
- Regulatory certainty for investors: national and European public authorities with legislative and regulatory powers need to ensure a predictable regulatory framework to guarantee investment made and certainty for investors.
- Technological neutrality should be respected, as an essential requirement for guaranteeing competition on the deployment of infrastructure for e-communication services. OTE believes that public endorsement of technologies may cause distortion of the market and technological development. In particular, public-funded interventions must allow for all high-speed broadband technology options and provide for a technologically neutral approach.
- Clear European and national ICT strategy, providing for public and private engagement on the basis of a long-term predictable regulatory environment.
- Factoring in flexibility to reflect geographical and other market realities: a 'one-size-fits-all' technological approach does not respond to the challenges of different national markets and geographies.
- Boosting digital literacy and stimulating demand: making citizens familiar with the economic and social benefits brought about by broadband is necessary to have infrastructure investment matched by user uptake and fully unleash the advantages of a 100% connected society.

### **Promoting access to creativity at all levels**

OTE is committed to stimulating the uptake of broadband services by Greek citizens through ongoing investment in digital content services, including IPTV. However, OTE would like to stress the importance



of creation of local content and of availability of content in many languages (the issue otherwise known as “multilingualism”). The European Commission and the European Union in general, being “multilingual” institutions themselves, must take more action towards the promotion of multilingualism, by helping lifting the language barriers, so that all European citizens enjoy knowledge and services.

### **Using ICT to improve the quality of life of EU citizens**

As noted elsewhere in this submission, OTE is convinced of the importance of educating European citizens as to the range of services available online and the benefits that they bring to their daily life. OTE feels that this responsibility should not only fall upon industry, but also upon public administrations at both national and European level.

As part of its efforts to respond to these challenges in 2006 and 2007 OTE organized a nationwide broadband road show, “OTE on the Broadband”. Under the key message “make your life easier” and with the main objective of educating and engaging the interest of citizens across Greece on internet and broadband services, the mobile information unit of OTE visited 33 locations from July 2006 to June 2007, covering most areas of the Greek periphery. More than 28,000 visitors were informed about the advantages broadband and new technologies can bring to their daily lives. OTE would be please to share its experiences with other industry and public sector stakeholders.

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