

This document has been updated with Rewheel's response to the inaccurate statements which were attributed to Wind Hellas on the 11th of May 2020 in a story reported by Euro2day.gr¹.

This document also includes Rewheel's original response to the inaccurate statements, misrepresentations and misleading claims made by the Greek national regulatory authority for Telecommunications² (Εθνικής Επιτροπής Τηλεπικοινωνιών και Ταχυδρομείων in short EETT), Vodafone Greece³ and other unnamed industry sources in Greece following the publication by the Hellenic Competition Commission (Ελληνική Επιτροπή Ανταγωνισμού in short HCC) of Rewheel's study⁴ 'Review of mobile data connectivity competitiveness in Greece within the wider context of digital economy competitiveness' that was commissioned by the HCC.

New section

We will start with a general comment that addresses the non-constructive criticism we received from Vodafone, EETT and Wind.

Vodafone, EETT and Wind conveniently forgot to mention in their public responses and press releases that both the European Commission and Rewheel, using different methodologies, have repeatably and consistently come to the same conclusion. Greek mobile data prices have been for the last 5 years, and still are, among the most expensive in EU28 & OECD countries.

- a) Response to Wind's claim that " Γίνεται εξαγωγή γενικών συμπερασμάτων με αναφορές είτε σε ένα «προσεκτικά» επιλεγμένο πρόγραμμα κινητής τηλεφωνίας, είτε σε μια χώρα, η οποία κατά περίπτωση είναι πιο «ενδεδειγμένη» (από τη Μάλτα έως τον Καναδά...). Διατυπώνονται δογματικές απόψεις με μοναδική αναφορά σε μία μόνο, προφανώς «επιλεγμένη» πηγή ή σε πηγές που είναι μελέτες της ίδιας της εταιρείας συμβούλων(!). Αγνοείται πλήρως η καρτοκινητή, ενώ αποτελεί πάνω από το μισό της Ελληνικής αγοράς. "

The claim made by Wind that Rewheel's study fully ignores prepaid packages that represent more than half of the market is incorrect.

In page 8 of the PUBLIC version of the study (section 3.1 of the full version of the study) we explicitly state that "We compared the March 2020 Greek consumer mobile data connectivity prices – of smartphone plans with voice and data connectivity and as well of mobile broadband (data-only) plans – with prices from seven other selected European markets. The markets we selected are EU member states that have a Comparative Price Level – reported by Eurostat – that is higher than Greece's." For this comparison we took into account all types of plans with voice, SMS and data connectivity irrespective the volume and irrespective they type of payment. For this type of comparison, we included Greek operator Καρτοκινητή, Καρτοσυνδεση, and Συμβολαια plans. Below we present again how does Greek mobile data metrics/price compare to the seven selected European markets.

Comparison of smartphone mobile data connectivity price level in Greece and selected 3-MNO and 4-MNO EU markets, March 2020

Country	Comparative price level	Affordable for most			Affordable for some			Lowest price for unlimited data volume	
		Max GB for 20 EUR or less per month incl. VAT and other taxes	Max GB for 40 EUR or less per month incl. VAT and other taxes	Max GB for 20 EUR or less per month incl. VAT and other taxes	Max GB for 40 EUR or less per month incl. VAT and other taxes	with minimum 3 Mbit/s speed for HD video streaming & unlimited minutes/SMS per month incl. VAT and other taxes	with minimum 3 Mbit/s speed for HD video streaming & unlimited minutes/SMS per month incl. VAT and other taxes	with minimum 3 Mbit/s speed for HD video streaming & unlimited minutes/SMS per month incl. VAT and other taxes	
Greece, 3 MNOs	84	2.6	300	500	11	500	500	149.9	Full network available speed, includes a new smartphone every year
Germany, 3 MNOs	104	20	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	39.9	10 Mbps maximum speed
Netherlands, 3 MNOs	112	20	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	25.0	Full network available speed
Austria, 3 MNOs	109	20	2,000	2,000	30	Unlimited	Unlimited	45.0	Full network available speed
Ireland, 3 MNOs	129	80	Unlimited	Unlimited	80	Unlimited	Unlimited	-	Unlimited data in smartphone plans not available
Finland, 3 MNOs	122	Unlimited	Unlimited ^d	Unlimited ^d	Unlimited	Unlimited	Unlimited	22.0	100 Mbit/s speed
Italy, 4 MNOs	100	50	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	30.0	Full network available speed
UK ^e , 4 MNOs	117	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	Unlimited	17.0	Full network available speed

^d Unlimited data volume at 100 Mbit/s speed costs 18 EUR per month. If subscribers use minutes/SMS they pay at most 14 EUR extra to bring the total to 22 EUR per month.

^e GBP.

rewheel.research.fi

¹<https://www.euro2day.gr/news/enterprises/article/2022676/wind-gia-times-kinthts-epifylassomaste-kata-pantos.html>

²https://www.eett.gr/opencms/opencms/admin/News_new/news_1201.html

³<https://www.euro2day.gr/news/economy/article/2021415/sklhrh-epithesh-vodafone-sthn-rewheel-gia-tis-time.html>

⁴https://epant.gr/files/2020/connectivity/Greek_mobile_data_connectivity_competitiveness_review_March2020_PUBLIC.pdf

- b) Response to Wind's claim that " Απορρίπτεται συλλήβδην η παγκοσμίως αναγνωρισμένη ως βέλτιστη πρακτική κοινή χρήση υποδομών (network sharing), αγνοώντας την προφανώς θετική επίδραση σε τομείς όπως η ποιότητα των υπηρεσιών, το περιβαλλοντικό αποτύπωμα, η μείωση κόστους."

The claim made by Wind that Rewheel has outright rejected the advantages of network sharing is incorrect. Please see below an extract from the full study where we detailed the main advantages of network sharing.

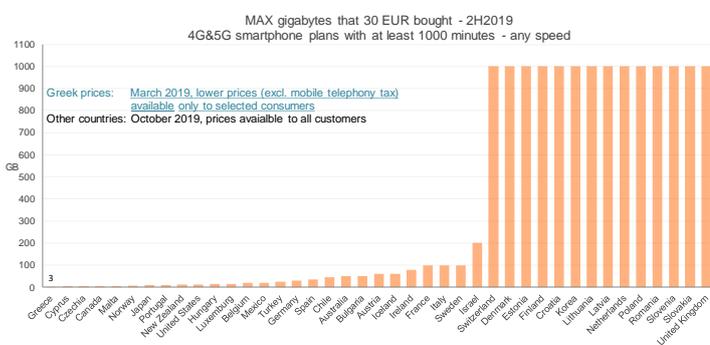
BEREC summarized the following four benefits of mobile infrastructure sharing: cost reduction, improved efficiency (with respect to administrative costs and efficient use of spectrum), enhancing consumer choice (e.g. sharing has allowed the preservation of service-based competition in certain geographic areas), and public interest (e.g. protection of outstanding landscape, contribution to town/country planning, decrease energy consumption).

- c) Response to Wind's claim that " Έκπληκτοι επίσης μάθαμε ότι η υψηλή φορολογία στην Ελλάδα (η υψηλότερη της Ευρώπης) δεν έχει επίπτωση στις τελικές τιμές που πληρώνει ο Έλληνας καταναλωτής. Και πάλι, με αποδεικτικό στοιχείο ένα μόνο πρόγραμμα της Cosmote και μια μελέτη, πάλι κατά σύμπτωση, της ίδιας εταιρείας συμβούλων."

Wind's claim is incorrect.

Firstly, Rewheel did not state in its study that the mobile telephony tax has no effect on retail prices in Greece. Of course, it has an effect (it increases the end price that consumers pay). In responding to the question "Are Greek mobile connectivity prices very expensive due to the mobile telephony tax?" we concluded that "No. Prices in Greece are very expensive even after excluding the mobile telephony tax."

Secondly, our conclusion that mobile data prices in Greece are very expensive even after excluding the mobile telephony tax is not based on a single plan of Cosmote but rather on many different comparisons that are contained in the full report some of which are illustrated in the exhibits below.



Unlimited plans were plans with truly unlimited volume (no FUP) or at least 1000 gigabytes. Countries with the same gigabyte volume are listed alphabetically using abbreviation codes (e.g. Switzerland: CH).

research.rewheel.fi ©

Are Greek mobile data connectivity prices expensive due to the mobile telephony tax?

← 3 mobile network operators				→ 4 mobile network operators			
Greece	Germany	Netherlands	Austria	Ireland	Italy	France	UK
February 2020 bill of Cosmote s.p.a. Mobile 1500 plan with 1200 mins & 0.2 gigabytes	Vodafone Germany March 2020 plan with unlimited mins & 5 gigabytes	Deutsche Telekom Netherlands March 2020 plan with unlimited mins & 7 gigabytes	Deutsche Telekom Austria March 2020 plan with unlimited mins & 12 gigabytes	Eir owned by the French Iliad group March 2020 plan with unlimited mins & 80 gigabytes	Vodafone Italy March 2020 plan with unlimited mins & 50 gigabytes	Bouygues Telecom France March 2020 plan with unlimited mins & 60 gigabytes	Three UK March 2020 plan with unlimited mins & 100 gigabytes
Price 14.3 EUR Tax 1.7 EUR VAT 3.9 EUR Total 19.9 EUR	Price 12.6 EUR Tax - VAT 2.4 EUR Total 15.0 EUR	Price 13.2 EUR Tax - VAT 2.8 EUR Total 16.0 EUR	Price 12.5 EUR Tax - VAT 2.5 EUR Total 15.0 EUR	Price 10.6 EUR Tax - VAT 2.4 EUR Total 13.0 EUR	Price 10.7 EUR Tax - VAT 2.3 EUR Total 13.0 EUR	Price 11.7 EUR Tax - VAT 2.3 EUR Total 14.0 EUR	Price 11.7 GBP Tax - VAT 2.3 GBP Total 13.0 GBP

No. Prices in Greece are very expensive even when the mobile & VAT taxes are excluded. Most Greeks pay 10-20 EUR per month to buy plans with tiny data volumes (e.g. 200 megabytes) while in many other EU countries, where the general consumer price level is much higher consumers buy 5-100 gigabytes with ~15 EUR/month.

*Greece operates a regime like the European Commission's, however, it is not obvious that above Greek mobile data prices are the highest in EU and not representative of prices in the whole Greece as they usually have lower prices than those listed in their website. Hence, in this comparison we used the actual bill of a consumer first subscriber to Cosmote's Mobile 1500 plan with a fixed retail price of 26.60 EUR/month. The consumer also subscribes to Cosmote fixed-line services and gets a 25% (-3.2 EUR) discount on its mobile bill. Without this discount the consumer would have pay 17.5 EUR/month (incl. the 12% mobile tax & 24% VAT).

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- d) Response to Wind's claim that "Γίνεται εκτενέστατη αναφορά στον περίφημο 4ο παίκτη. Αν είναι τόσο καλές οι συνθήκες για τους τρεις υφιστάμενους, που είναι τα υπερκέρδη που θα έπρεπε να έχουμε ως ο 3ος παίκτης της αγοράς; Γιατί αγνοείται το γεγονός ότι υπήρχε 4ος παίκτης που επέλεξε να αποχωρήσει για να μετριάσει τις κεφαλαιακές του απώλειες; Που ακριβώς είναι η ουρά των επενδυτών για να μπουν σε αυτήν την τόσο πολλά υποσχόμενη αγορά; Γιατί δεν γίνεται καμία αναφορά στο ασυνήθιστα μεγάλο μερίδιο που έχει ο πάροχος με δεσπόζουσα θέση;"

Wind's broad and general claim seen above is incorrect. Rewheel agreed with Wind by concluding in its study that "...if the prospect of a 4th MNO entry is very unlikely, like in Greece".

Moreover, Rewheel did extensively considered Cosmote's high market shares that lead to a very concentrated market. Please see below an extract from the full report.

“We estimate the Herfindahl-Hirschman Index (HHI) in the Greek market to be 4,039 i.e. highly concentrated market according to the US Department of Justice and the European Horizontal Merger Rules. In terms of connection shares Cosmote’s market share in 2018 was ~50%, ~Vodafone’s 30% and Wind’s ~20%. These market shares return an HHI of ~3,695 which as well implies a highly concentrate market.”

Πίνακας 1.11: Μεριδία ΕΚΤ ως προς τα λιανικά έσοδα

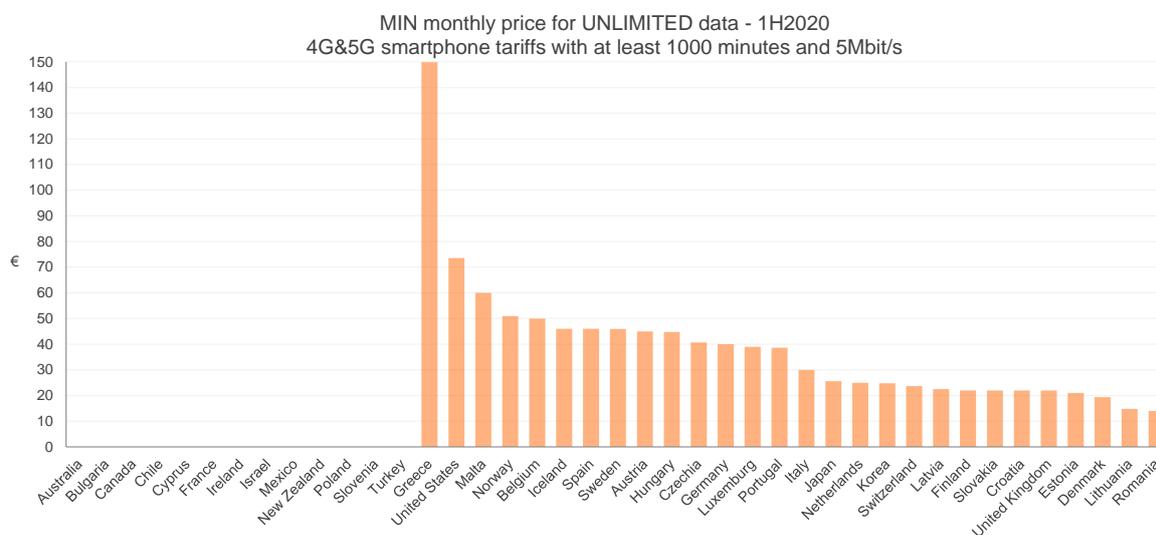
	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018
COSMOTE	45%-55%	45%-55%	45%-55%	45%-55%	45%-55%	45%-55%	45%-55%	45%-55%	45%-55%	45%-55%
CYTA	-	-	-	-	-	0%-5%	0%-5%	0%-5%	0%-5%	0%-5%
VODAFONE	25%-35%	25%-35%	25%-35%	25%-35%	25%-35%	25%-35%	25%-35%	25%-35%	25%-35%	25%-35%
WIND	15%-25%	15%-25%	15%-25%	15%-25%	15%-25%	15%-25%	15%-25%	15%-25%	15%-25%	15%-25%

Πηγή: ΕΕΤΤ (βάσει στοιχείων των οδαιοδοτημένων παρόχων)

And finally, Rewheel did present research data that showed that the operator’ market position (which typically dictates its market share size) does appear to correlate with mobile prices. The higher the market position of the operator the higher the monthly price. That is No.1 operators charge a median price that is higher than No.2 operators, No.2 operators charge a median price that is higher than No.3 operators and No.3 operators charge a median price that is higher than No.4 operators.

- e) Response to Wind’s claim that “ Παράλληλα, στην μελέτη γίνεται εκτενής - πλην όμως χωρίς κανένα έρεισμα, αναφορά σε τιμές παγίων κινητής των 60€, 70€, ακόμη και 150€/μήνα και αναρωτιόμαστε σε ποιο παράλληλο σύμπαν υπάρχουν αυτές οι τιμές. Το αβάσιμο των παραπάνω αποδεικνύεται πλήρως από την απλή και μόνο ανάγνωση των πραγματικών δεδομένων που ουδέποτε αναζητήθηκαν.... Το 80% των πελατών συμβολαίου της WIND έχει πάγιο που είναι κάτω των 30€/μήνα με όλους τους φόρους και τέλη κινητής (και κάτω από 22€ χωρίς φόρους και τέλη), έχοντας μέση πραγματική χρήση mobile internet 1,5 GB τον μήνα.”

Wind’s claim regarding that prices of up to 150 EUR/month do not exist in Greece is incorrect. As we have stated both in the PUBLIC version of the study and as well in many instances in the full version of the study if Greek consumers had to pay 149.90 EUR per month during March and April 2020 to buy a mobile telephony plan that included at least 1000 national minutes and unlimited data volume that supports HD video streaming (at least 5 Mbit/s speed at all times). That was COSMOTE Mobile Platinum⁵ plan. The chart seen below has not been previously published and will be included in DFMonitor’s 13th release 1H2020 (April 2020 prices) that will be available soon.

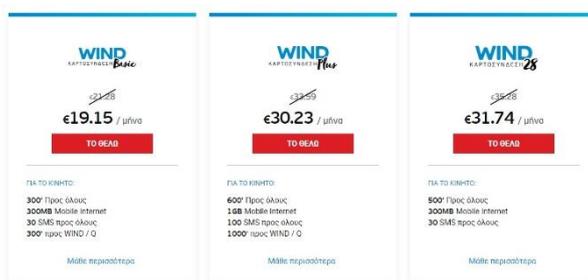


Tariff retail monthly price incl. VAT & tax.
Minimum price among all eligible unlimited data volume tariffs logged in the database for country.
Unlimited data volume tariffs had no finite gigabyte volume (i.e. no throttling or deprioritization) or at least 1000 gigabytes.

⁵<https://www.cosmote.gr/cs/cosmote/gr/platinum.html>

Regarding Wind's statement that 80% of their postpaid subscribers have monthly retail fees that are below 30 EUR when all taxes are included and below 22 EUR when all taxes are exclude with an average actual usage data of 1.5 gigabytes per month we have the following comments.

Firstly, we would like to note that Wind's data appear to be aligned with one of our main study conclusions. That is "Most Greeks pay 10-20 EUR per month in retail to buy plans with tiny data volumes (e.g. 0.2 gigabytes) while in many other EU countries, where the general consumer price level is much higher consumers buy 5-100 gigabytes (+ unlimited minutes/SMS) with ~15 EUR/month in retail". Please note that Wind's data presented above are only for those 80% of postpaid customers that pay less than 30 EUR per month including all taxes. Prepaid customers pay less per month but also buy plans with typically lower minute and gigabyte allowances. So, many of those postpaid customers that Wind referred to are probably subscribers of Wind's Καρτοσυνδεση plans, shown below, that include up to 600 national minutes and 1 gigabyte for 30.23 EUR per month which compared to what consumers buy in most other 40 EU & OECD markets when they spend 30 EUR per month (at least 1000 national minutes and 10 to unlimited gigabytes) is very expensive.



Οι προσαρμογές, εκτός από αυτές, συμπεριλαμβάνονται, καθώς με 24 μηνιαία δόσεις αναβαθμίζονται και περιλαμβάνονται στην αγορά.

For the sake of transparency rather than disclosing the average actual usage per month for the 80% of its postpaid subscribers (it is not entirely clear if the 1.5 GB/month figure quoted from Wind is the actual average usage of the 80% of postpaid subscribers or the average usage of all of its postpaid subscribers) Wind could consider disclosing the median monthly retail price and the median included gigabyte allowance of its postpaid and prepaid customers that subscribe to monthly mobile telephony plans which are not bundled with fixed broadband, fixed telephony, TV or any other services.

- f) Response to Wind's claim that "Ακόμη όμως δεν είναι αργά... θα χαρούμε να τους εξυπηρετήσουμε και να πάρουν το WIND ONE, που συνδυάζει κινητό με 1500 λεπτά και 5Gb και σταθερό με 100Mbps, με 55€ με όλους τους φόρους και τέλη κινητής (παρεμπιπτόντως η τιμή είναι 40,9€ χωρίς φόρους και τέλη, αλλά αυτά σύμφωνα με την εταιρεία Rewheel δεν αυξάνουν σημαντικά την τελική τιμή...)."

Regarding Wind's statement above we would like to note that in the full version of the study Rewheel did analyse the price level of fixed-mobile bundled plans (section 3.3) and as well the price level of small & medium enterprises (SMEs) business mobile telephony plans in Greece and compared them to the price of the unbundled plans. Moreover, we again stress that Rewheel did not state in its study that the mobile telephony tax has no effect on retail prices in Greece.

If the price of fixed-mobile bundled plans in Greece is lower or higher than other European or OECD markets, was not the subject of this study. Nevertheless, we would like to note that if a Greek consumer is looking to buy a mobile telephony plan with at least 1000 national minutes and 5 gigabytes it will pay less than 33 EUR per month in retail (or less than 30 EUR excluding taxes) in all other 40 EU & OECD markets. WIND's price for the WIND ONE 5 GB fixed-mobile bundled plan that includes only 300 national minutes is still 25% more expensive than that. And the argument that WIND's price cannot be compared because it also includes fixed broadband is not valid. If a consumer only needs to buy a mobile telephony plan with 5 gigabytes and the operator only sells such plan bundled with fixed broadband then the consumer is forced to pay much more every month for services that it does not necessarily need.



Original sections

- g) Response to the claim made by unnamed sources that “Στελέχη της αγοράς τηλεπικοινωνιών υποστηρίζουν πως η Rewheel «δεν εξειδικεύεται στις έρευνες αγοράς, αλλά στις μελέτες που έχουν σχέση με τη διαχείριση φάσματος ραδιοσυχνοτήτων.”

The following independent authorities and ministries have commissioned, acquired access, used and/or cited Rewheel's mobile market price comparison and competition analysis studies. The ex Commissioner of the European Commission responsible for Competition Joaquín Almunia, the United States Department of Justice, the New York, California and many other US State Attorney General Offices, the National Competition Authorities of Canada, Australia, Germany, Austria and the Netherlands, the Monopoly Commission of Germany, the Ministry of Economic Affairs of the Netherlands, the Ministry of Industry and Trade of Czechia, the Korean Electronics and Telecommunication Research Institute, the National Regulatory Authorities of the United Kingdom, Germany, the Netherlands, Finland, Belgium and Ireland.

Antonios Drossos and Pal Zarandy (Rewheel partners) have authored telecom expert opinions and/or quoted by the Financial Times, The Economist, The New York Times, The Wall Street Journal, The Washington Post, Reuters, Bloomberg, Business Insider, TIME, Politico, Handelsblatt, Der Spiegel, BILT, Die Welt, WDR, Focus, Kathimerini, etc.

- h) Response to the claim made by EETT “Οι πολιτικές κοινής χρήσης υποδομής αποτελούν διεθνή τάση με στόχο τη μείωση του κόστους επενδύσεων και πρέπει να ενθαρρύνονται και προφανώς πρέπει να διευκρινίζεται αν αφορούν χρήση φάσματος, χρήση ενεργού εξοπλισμού ή απλώς παθητικό εξοπλισμό που οδηγεί και σε μείωση του αριθμού των κεραιοσυστημάτων.” and to the claim made by Vodafone “...πως η έκθεση εσφαλμένα υποστηρίζει πως Vodafone Ελλάδα και Wind Hellas μοιράζονται φάσμα, ενώ στην πραγματικότητα μοιράζονται ενεργό δίκτυο, κάτι που θεωρείται «βέλτιστη πρακτική» ακόμα και από την Ευρωπαϊκή Επιτροπή.”

The claims made by EETT and Vodafone are incorrect.

Rewheel explicitly referred in its study to the Vodafone and Wind network sharing agreement as an active network sharing agreement and not as a spectrum sharing agreement. Below please see the actual text from Rewheel's report.

"In June 2013 Vodafone and Wind announced an agreement to establish a 50/50 joint venture (JV) company named Victus Networks in order to share their 2G/3G mobile access network infrastructure. A month later, on the 25th of July 2013, Vodafone's and Wind's network sharing agreement was cleared by EETT. EETT stated in the press release that "...it allows VODAFONE and WIND to share equipment and network infrastructure for mobile 2G/3G (network sharing)...but expressly reserved the right to intervene if the above agreement results in violations of the law of electronic communications or restricts competition"."

Moreover, EETT as one of the 28 national regulatory telecom authorities and member of BEREC (the Body of European Regulators for Electronic Communications) must surely be aware of the potentially anti-competitive effects of active mobile network sharing detailed in the '*Common position on infrastructure sharing*' adopted⁶ by BEREC in June 2019. Therein, BEREC members including the EETT wrote that active network sharing subject to the geographic scope is likely to have a great impact on competition.

- i) Response to the claim made by EETT “Η επιλογή των χωρών που χρησιμοποιούνται ως παραδείγματα αποτελούν αντιπαραδείγματα παρεμβάσεων, όπως η περίπτωση του Καναδά η οποία είναι χαρακτηριστικό παράδειγμα μονοπωλιακής/δυσπωλιακής αγοράς.”

EETT's claim is incorrect and misleading.

In Rewheel's study the Greek mobile data connectivity prices of March 2020 were compared to prices from seven other selected European member states that have a Comparative Price Level – reported by Eurostat – that is higher than Greece's. Mobile data

⁶https://berec.europa.eu/eng/document_register/subject_matter/berec/download/0/8605-berec-common-position-on-infrastructure-_0.pdf

connectivity prices in those seven selected European member states were much lower than Greek prices during March 2020 i.e. mobile markets were significantly more competitive in those seven European member states than in Greece.

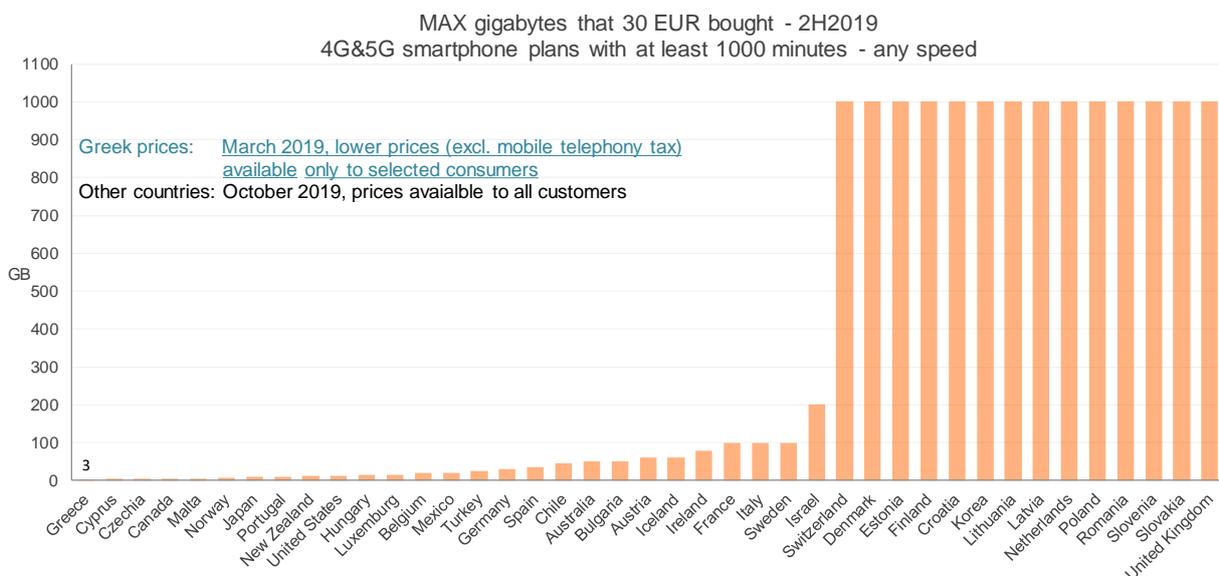
Canada was used in Rewheel's study as a counter example. Mobile data connectivity prices in the 3-MNO tight oligopoly Greek market are higher even than prices in Canada which is a de-facto network duopoly market.

- j) Response to the claim made by EETT “Η επιλογή στη σύγκριση πακέτων που δεν είναι αντιπροσωπευτικά της μέσης χρήσης στην ελληνική αγορά καθώς δεν υπάρχει ρητή αναφορά στην επιβάρυνση της φορολογίας ή άλλων χαρακτηριστικών όπως η χρονική δέσμευση του συμβολαίου, η επιδότηση συσκευής ή εκπαιδευτική πολιτική, κλπ. Αφορά δηλαδή σε ένα πολύ μικρό μερίδιο αγοράς.”

EETT's claim that Rewheel's study does not take into account the Greek mobile telephony tax is false.

In the study Rewheel has extensively analysed the effect of the Greek mobile telephone tax and concluded that mobile data connectivity prices in Greece are very expensive even after excluding the mobile telephony tax.

The fact is that even after we excluded the mobile telephony tax from the lowest available Greek March 2020 prices (i.e. lower prices that were available only to some but not all Greek consumers) Greece still ranked as the least competitive EU 28 & OECD country as seen in the chart below.



Unlimited plans were plans with truly unlimited volume (no FUP) or at least 1000 gigabytes.
Countries with the same gigabyte volume are listed alphabetically using abbreviation codes (e.g. Switzerland: CH).

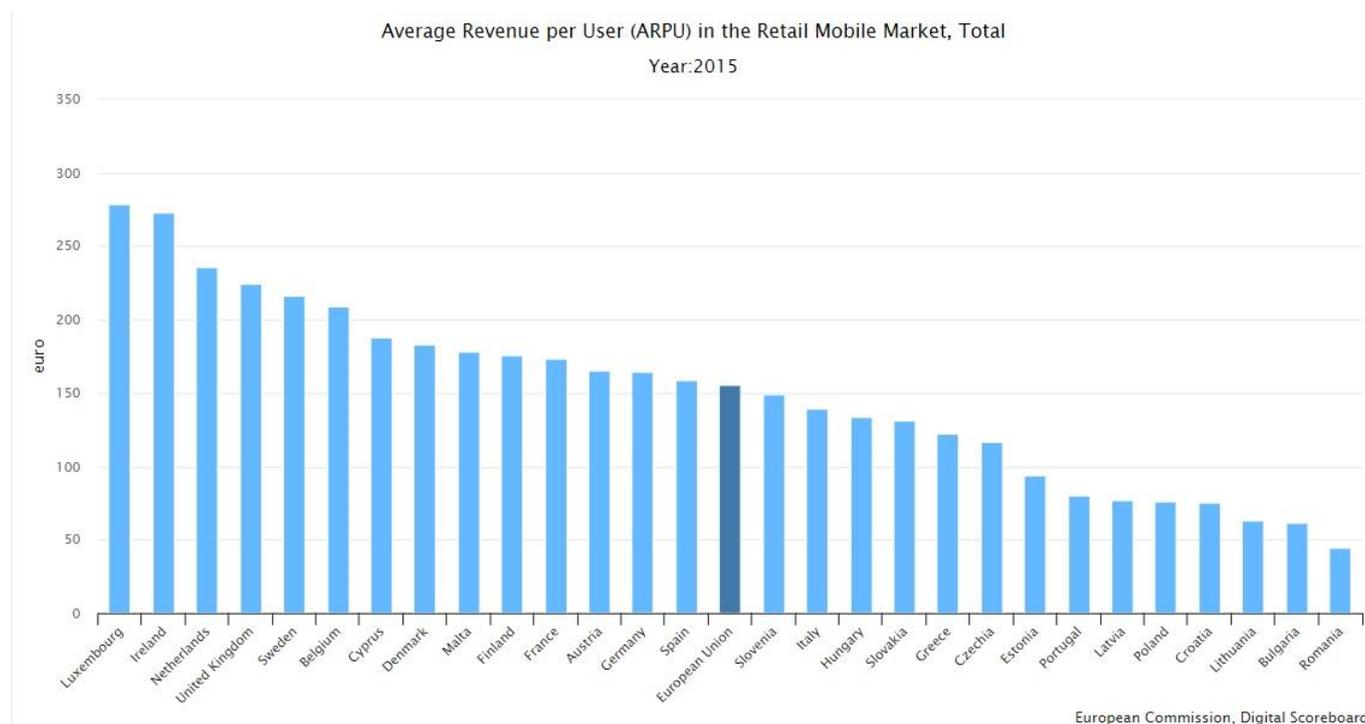
EETT's claim that Rewheel's study is not representative of the typical usage in Greece is broadly unsubstantiated. Rewheel's methodology used in this study examined mobile data connectivity prices of consumer post-paid and prepaid monthly rolling plans that were available to all consumers by taking into account all eligible discounts.

While the OECD methodology used in European Commission's mobile broadband comparison studies does not account for monthly discounts for longer binding contracts, Rewheel methodology does account for such discounts (we log the lowest available price that a consumer could pay irrespective of the contract duration).

The fact is that irrespective of the contract duration Greek mobile data connectivity prices are the most expensive among the EU28 member states. Both for short term contract durations as measured by the European Commission and as well for longer contract durations as measured by Rewheel.

- k) Response to the claim made in Capital.gr 8th May 2020 article⁷ titled “Εκθεση-φωτιά για κινητή τηλεφωνία και... ανεξάρτητες Αρχές” and which was attributed to unnamed sources “...πλην κύκλοι σημείωναν πως πολλές φορές έχει επισημανθεί πως η μεθοδολογία των φορέων που παρακολουθούν τις τιμές στην Ευρώπη στηρίζεται στις ονομαστικές τιμές, ενώ στην Ελλάδα υπάρχει το παράδοξο επί των ονομαστικών τιμών να υπάρχουν υψηλότερες εκπτώσεις, κάτι που αποδεικνύεται από το ότι το μέσο έσοδο ανά πελάτη στην Ελλάδα σε σχέση με όλη την υπόλοιπη Ευρώπη είναι από τα χαμηλότερα.”

“Το μέσο έσοδο ανά πελάτη” i.e. Average revenue per user (ARPU) in the retail mobile market used to be reported⁸ by the European Commission’s Digital Score Board, see chart below. Greece ranked as the EU country with the 10th lowest ARPU in 2015 (Italy had the 13th lowest ARPU back in 2015). The European Commission compiled the ARPU data by dividing the reported (by the sector regulators) mobile retail revenue with the reported number of mobile users (i.e. SIM cards).



For reasons unknown to Rewheel, the European Commission has not reported the ARPU metric since 2015. Rightly so, in our opinion, because ARPU is a very unreliable metric and it is not a measure of retail prices. Probably the European Commission stop reporting the ARPU metric when it started to conduct annual mobile broadband price comparison studies back in 2015.

There are two main reasons why ARPU is a very unreliable (meaningless) metric. The user (SIM cards) penetration varies up to 2.5x times among the EU28 member state markets. The second reason is the fact that the ARPU metric (average mobile revenue per user) does not include any information regarding the average quantity of included gigabyte/minutes/SMS (i.e. unit prices)

The average mobile retail revenue per capita earned⁹ by the Greek, Italian and French operators in 2019 was quite similar (~16 EUR in Greece and ~17 in Italy/France). However, Greek mobile prices are a a-universe-apart from the Italian and French prices. As we showed in the EPANT commissioned study¹⁰ most Greek consumers pay 10-20 EUR every month to buy tiny (gigabyte/minute/SMS) allowances while most Italian and French consumers pay similar amounts every month to buy plans with 50-60 gigabytes (+ unlimited minutes/SMS).

The bottom line is that the high mobile data connectivity prices in Greece do not yield a higher service revenue per user/capital for the Greek mobile operators simply because most consumers are not willing to pay more much more than 10-20 EUR per month.

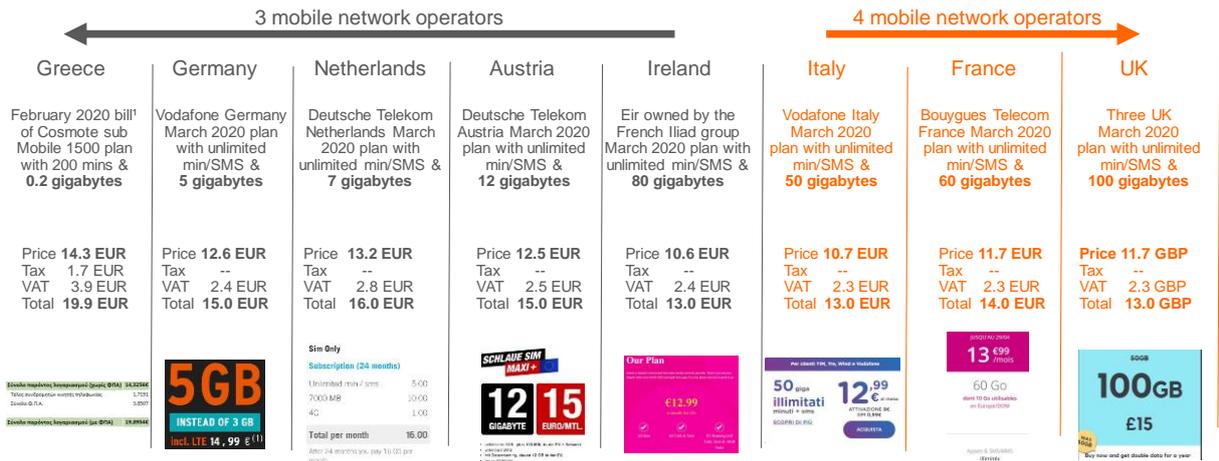
⁷<https://www.capital.gr/epixeiriseis/3451823/ekthesi-fotia-gia-kiniti-tilefonia-kai-anexartites-arxes>

⁸https://digital-agenda-data.eu/datasets/digital_agenda_scoreboard_key_indicators/visualizations

⁹Data reported by sector regulators, operators and Rewheel analysis

¹⁰https://epant.gr/files/2020/connectivity/Greek_mobile_data_connectivity_competitiveness_review_March2020_PUBLIC.pdf

Are Greek mobile data connectivity prices expensive due to the mobile telephony tax?



No. Prices in Greece are very expensive even when the mobile & VAT taxes are excluded. Most Greeks pay 10-20 EUR per month to buy plans with tiny data volumes (e.g. 200 megabytes) while in many other EU countries, where the general consumer price level is much higher consumers buy 5-100 gigabytes with ~15 EUR/month

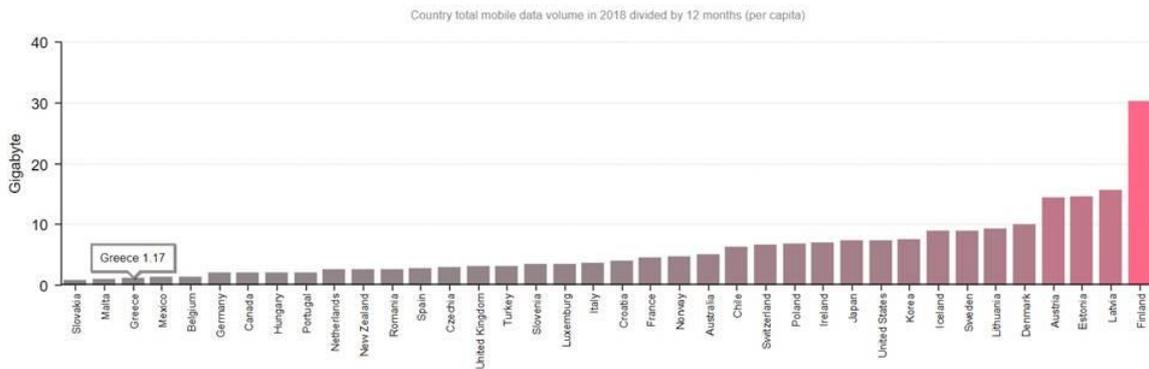
¹Greek operators argue that the European Commission's, Rewheel's, etc. studies that show Greek mobile data prices as the highest in EU are not representative because as they claim Greeks pay much lower prices than those listed in their websites. Hence, in this comparison we used the actual bill of a consumer that subscribes to Cosmote's Mobile 1500 plan with a listed retail price of 29.90 EUR/month. The consumer also subscribes to Cosmote fixed-line services and gets a 20% (-3.2 EUR) discount on its mobile bill. Without this discount the consumer would have pay 17.5 EUR/month (excl. the 12% mobile tax & 24% VAT). research.rewheel.fi ©

The high mobile data connectivity prices in Greece though do suppress usage i.e. most Greeks pay 10-20 EUR per month to buy plans that have tiny gigabyte allowances and hence they cannot use their smartphones to browse the web, watch videos, do remote schooling or buy things online.

And that is apparent by the Greek mobile data usage per capita which was the third lowest in EU & OECD countries in 2018 as seen in the chart below reported in Rewheel's research website¹¹. Greek mobile data usage per capita was 3x lower than Italian and 4 times lower than French usage in 2018. And in 2019 the gap grew wider.

Data usage

Mobile data usage per capita per month in 2018 - Countries



¹¹<http://research.rewheel.fi/networkeconomics/>