International Roaming

ERG Benchmark Data Report for October 2008 – March 2009

July 2009

Contents

Section 1

Executive summary

1.1 Information gathered by the European Regulators Group (ERG) suggests a high level of compliance with the Regulation on international roaming services in all EU Member States (Regulation (EC) No 717/2007[1]). At the retail level all consumers have access to a Eurotariff, with regulated maximum rates. At the wholesale level the charges set between operators are also in line with the declining regulated caps.

1.2 The additional transparency measures, in the form of both a "push" SMS service upon entering another Member State and the facility to receive personalised tariff information through a free of charge phone number, continue to perform as specified by the Regulation.

ERG Benchmark Report on International Roaming

1.3 This ERG Benchmark Report on International Roaming (the "Report") presents the results of the fourth round of data collection on European international roaming services undertaken by ERG, covering the period 1 October 2008 to 31 March 2009. It also includes data from the previous rounds of data collection in order to put the current figures in perspective.

1.4 The data collected for this Report suggests that the trends that ERG observed in the previous rounds of data collection have continued with no significant changes.

1.5 As it follows the drafting and subsequent adoption of the amended roaming Regulation in June 2009 (Regulation EC No 544/2009[2]), ERG has chosen to limit this Report to a more basic form, which mainly includes the collected data and refrains from a more in-depth analysis.

[1] http://eur-lex.europa.eu/LexUriServ/site/en/oj/2007/l_171/l_17120070629en00320040.pdf
[2] http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:167:0012:0023:EN:PDF

Section 2

Introduction

2.1 The European Regulators Group (ERG) has been at the forefront of tackling the long-standing issue of high prices for international roaming services. In 2005, ERG undertook a study of international roaming that concluded that the EC Regulatory Framework did not provide the necessary tool-kit for NRAs to tackle the problems identified. ERG wrote to the Commission in December 2005 highlighting its concerns.

The 2007 Regulation

2.2 On 8 February 2006, Commissioner Reding announced an intention to regulate international roaming services with a "call for input" on how this might be undertaken[3]. ERG responded[4] to the Commission's proposals.

2.3 After significant debate, the first Regulation on international roaming services was published on 29 June 2007. The primary provisions capped wholesale and retail charges and set a number of transparency provisions to help to ensure that consumers were well informed. The provisions of the Regulation entered into force at different times, with retail and transparency provisions taking full effect by the end of September 2007 and wholesale provisions calculated annually from the end of August 2007.

2.4 On 23 September 2008, the Commission published a proposal to extend the 2007 Regulation in duration and scope. In particular, the Commission proposed the following measures from July 2009 to July 2013:

- extended wholesale and retail price regulation for voice, with a yearly decrease in the level of the caps
- price regulation of SMS roaming services at both the wholesale and retail levels
- safeguard price regulation of data roaming services at the wholesale level

And from July 2010 to July 2013:

- retail transparency measures to protect consumers from "bill shock" when data roaming

2.5 This followed a public consultation by the Commission launched on 7 May 2008. ERG's[5] views at the time were substantially reflected in the Commission's legislative proposals published on 23 September[6].

2.6 On 22 April 2009 the European Parliament adopted Regulation (EC) No 544/2009 at first reading, with a view to amending Regulation (EC) No 717/2007[7].

[3] http://ec.europa.eu/information_society/activities/roaming/roaming_regulation/first_phase/index_en.htm
[4] http://www.erg.eu.int/doc/whatsnew/erg_response_22_march_2006.pdf and http://www.erg.eu.int/doc/whatsnew/erg_response_11_may_2006.pdf
[5] http://erg.eu.int/doc/publications/erg_08_35rev1_resp_intern_roaming_cons_080729.pdf
[6] http://ec.europa.eu/information_society/activities/roaming/docs/regulation/reg_en.pdf

2.7 Subsequently on June 8 2009 the Council of EU Telecoms Ministers formally adopted the new EU roaming rules approved by the European Parliament.

2.8 The definitive text of Regulation (EC) No 544/2009 was published in the Official Journal of the European Union on 29 June 2009[8].

This Report

2.9 According to the 2007 Regulation, in force for the duration of this data collection period, individual NRAs are required, "…*to monitor developments in wholesale and retail charges" (Art. 7(3)), and the Commission*, "…*to report to the Parliament and the Council no later than 30 December 2008*", on the functioning of the Regulation making use, if appropriate, "…*of the information supplied pursuant to Article 7(3)*." (Art. 11(1)).

2.10 While the obligations are addressed to individual NRAs, ERG considered that it could add value by pursuing the following objectives:

- Simplify the process, not only for NRAs as ERG acts as a central point for the data collection, but also for the Commission, as the data is received from a single source and following data processing, which gathers all the information and checks it for inconsistencies

- Coordinate the actions of individual NRAs, as the data collection exercise uses a single and commonly agreed data collection model, and the process is synchronised and based on the same collection periods

- As far as possible, provide a common response to the different questions posed during the collection process by operators and NRAs, as ERG serves as the forum where these questions are commonly debated and addressed

2.11 In addition, ERG considered it important to collect and publish a wider range of information than that explicitly set out in Articles 7 and 11 in order to give a better picture of the effect of the Regulation and the state of evolution of the roaming market. ERG therefore consulted not only the market players (during September 2007) but also the Commission before finalising its data collection template.

2.12 ERG believes that the information collected in existing and subsequent reports should provide a sound basis for the Commission's interim and full review of the 2009 Regulation required by July 2010 and July 2011 respectively, and for any decisions regarding future regulation.

2.13 This Report is the fourth in a series of reports that ERG has produced providing an overview of international roaming across the EU. This Report covers the period October 2008 – March 2009.

2.14 ERG has also included data from previous reports for comparison. ERG considers that the data collected from just before the implementation of the 2007 Regulation can serve as a "benchmark" against which data can be assessed, after implementation. However, due to the highly seasonal nature of the roaming market, due care must be taken when

[7] http://www.europarl.europa.eu/sides/getDoc.do?type=TA&language=EN&reference=P6-TA-2009-0249
[8] http://eur-lex.europa.eu/LexUriServ/LexUriServ.do?uri=OJ:L:2009:167:0012:0023:EN:PDF

comparing different periods of time; comparing subsequent periods without taking seasonality into account could lead to invalid conclusions.

2.15 Following publication of previous reports,[9] some operators have provided their national NRA with more accurate data for one or more of the previous periods. These updates have been incorporated into the data used in this Report, which may create some inconsistencies with previous reports. In such cases, the data from the most recent report takes precedence. Similarly, it is possible that certain data in this Report might be updated in a subsequent report.

2.16 For the first time this Report also includes some data regarding Switzerland, collected by the Federal Office of Communications on behalf of the Swiss NRA ComCom.

Methodology for data collection

2.17 ERG consulted on a draft version of its data questionnaire during September 2007. Following comments received, ERG amended the data questionnaire sent to providers[10], with an accompanying Explanatory Memorandum in October 2007. Information gathered as part of this exercise has been used in the formulation of this Report.

2.18 After the first round of data collection and publication of the first report, the questionnaire was slightly altered to gain a better understanding of the difference between on-net and off-net data roaming prices and SMS roaming prices, at the retail level.

2.19 The information gathered for this Report covers both retail and wholesale prices for voice, SMS and data roaming services. In addition, information was gathered on traffic steering and inadvertent roaming. Each NRA aggregated individual provider data to provide a national aggregate to ERG. Therefore, only national aggregated data appears in this Report.

2.20 Over 130 providers of international roaming services provided information for this Report. These include virtually all of the mobile operators in the EU, as well as a significant number of MVNOs that provide roaming services in the EU[11]. ERG estimates that this covers around 95% of EU consumers using international roaming services today.

Format of the Report

2.21 The main body of this Report is set out in Section 3 below, which provides an overview of the data gathered to date. Section 4 gives explanations for some “anomalous” results, which in some cases may not be a fair reflection of reality. Annex 1 lists the providers that supplied information to NRAs for inclusion in this Report.

[9] http://erg.eu.int/doc/publications/2009/erg_09_01_intern_roaming_rep3_090112.pdf
[10] http://www.erg.eu.int/doc/publications/erg_07_47_rev1_data_model_spec_roaming_reg.xls
http://www.erg.eu.int/doc/publications/erg_07_47_rev1b_data_model_spec_on_roaming_reg_exp_mem.pdf
[11] Operators, and MVNOs, from both Norway and Iceland (which adopted the Regulation in January 2008) also contributed to the data collected as part of this report.

Section 3

Overall data summary

3.1 All EU countries took part in this data gathering exercise; Iceland and Norway also participated, given the extension of the 2007 Regulation to those countries from December 2007. In addition, Switzerland contributed to this data collection, although they have not adopted the Regulation. A comprehensive range of information was requested by NRAs from their national providers of international roaming services.

3.2 The data presented below represents the results of both the current and previous ERG data collections, and provides an overview of international roaming for the period 1 April 2007 to 31 March 2009, split by calendar quarter.

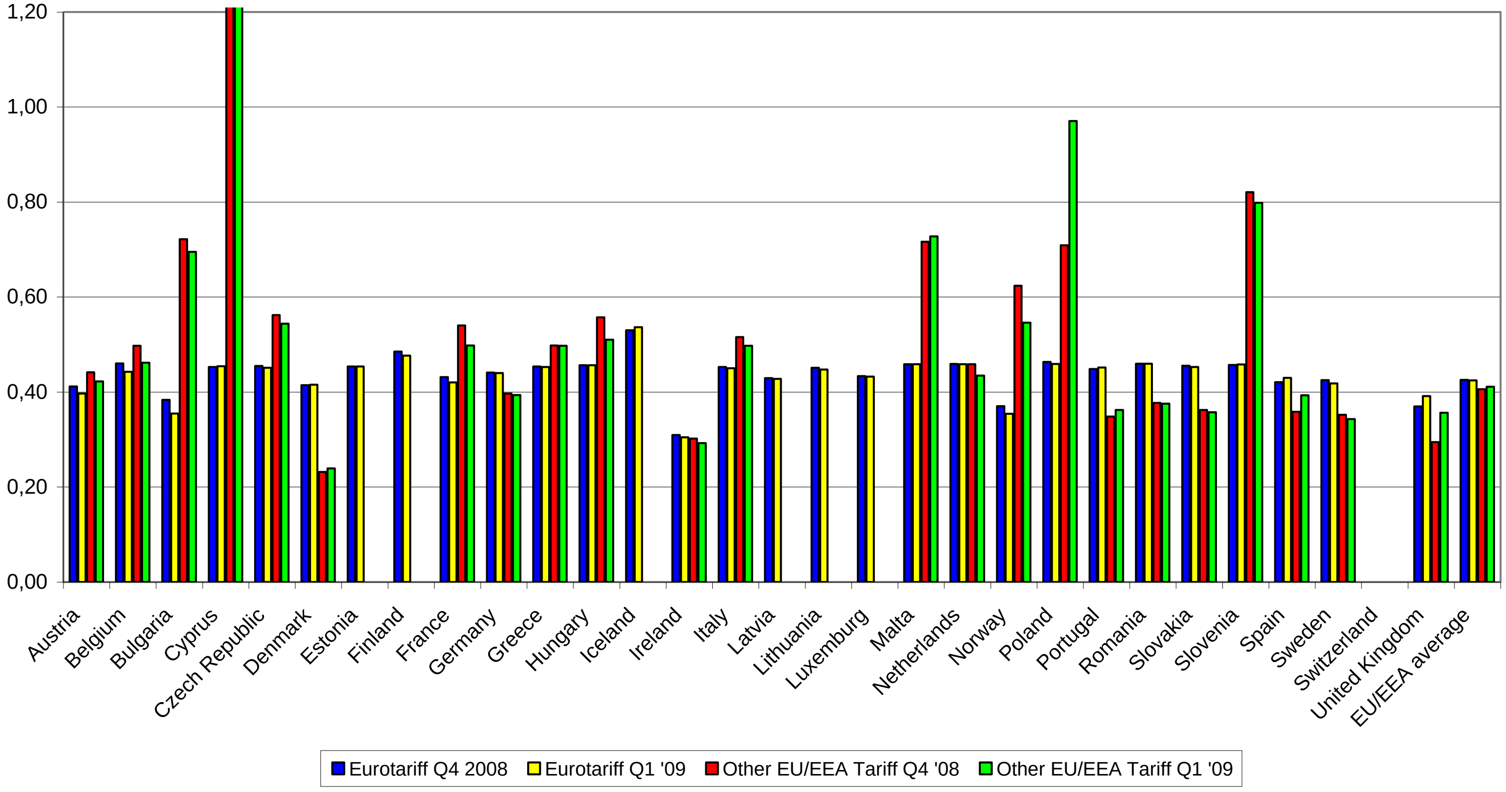
3.3 For ease of comparison, all retail prices included in the charts below exclude VAT. They are an average of prices paid by post-pay and pre-pay customers, including business users with standard business or consumer tariffs. Prices paid by “special corporate” customers[12] are not included. All averages are based on billed minutes of voice calls or billed megabytes of data, unless expressly stated otherwise.

3.4 For data services a distinction is made between group and non-group at the wholesale level and on-net and off-net at the retail level. 'Group' means the data pertains to traffic between entities within the same group where such entities are fully-owned or majority-owned by the group. 'Non-group' traffic is that which does not fall under the group definition. At the retail level, 'on-net' traffic concerns traffic that would be qualified as group traffic at the wholesale level and 'off-net' traffic is the retail equivalent of non-group traffic.

[12] This means undertakings that have negotiated a bespoke tariff for international roaming that is not available to individual customers.

Retail voice

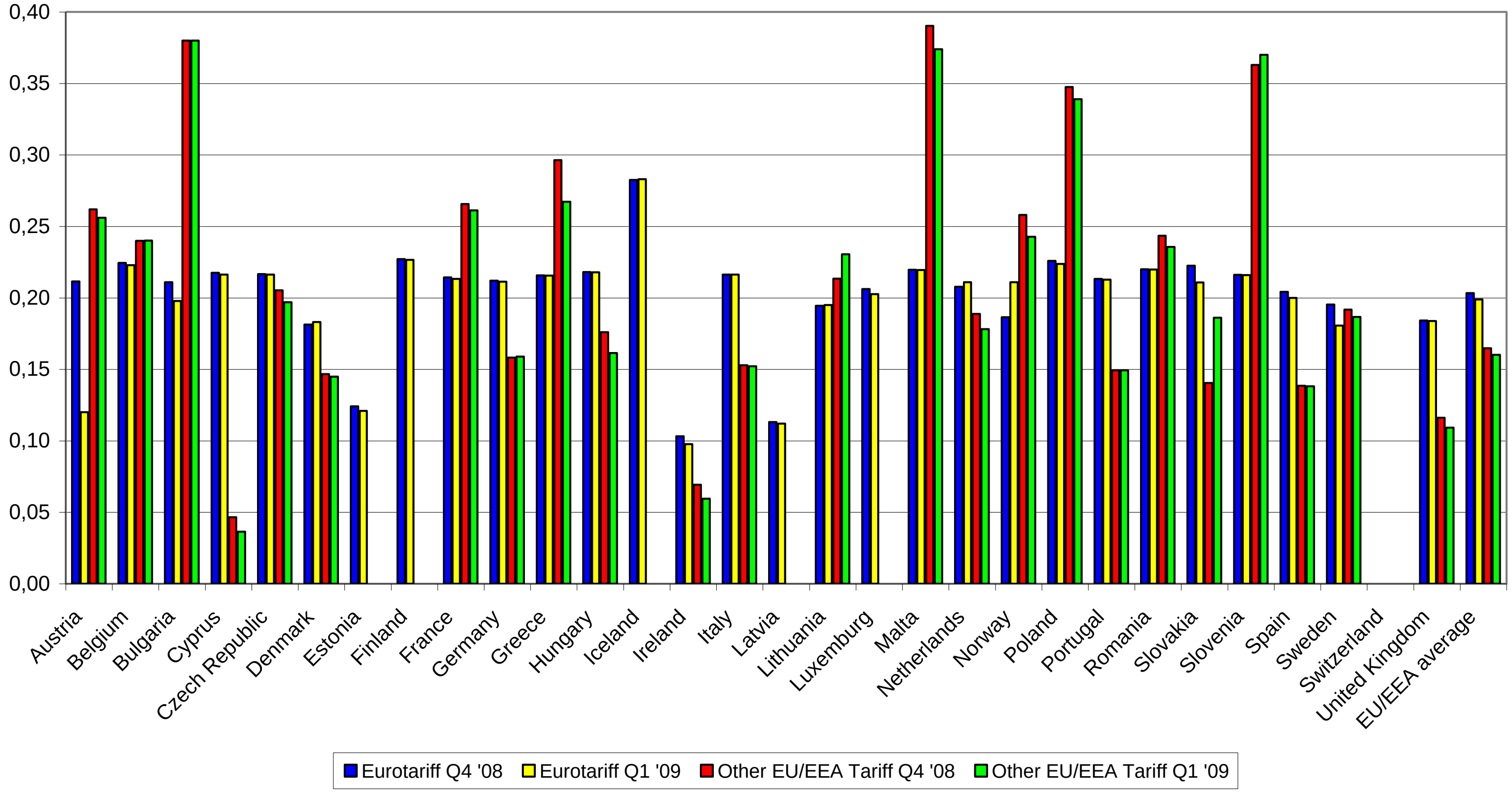
Figure 1: Average retail price per minute voice call made for all consumers (excluding special corporate): Eurotariff and other EU/EEA tariffs (based on billed minutes)



EU/EEA average: Eurotariff Q4 2008 = € 0.425; Eurotariff Q1 2009 = € 0.425; Other EU/EEA tariffs Q4 2008 = € 0.406; Other EU/EEA tariffs Q1 2009 = € 0.411.

Figure 1 indicates that for calls made, on average the Eurotariff was below the regulated tariff of € 0.46. The chart also shows that there exist interesting alternative EU/EEA tariffs, although there is considerable variation by country.

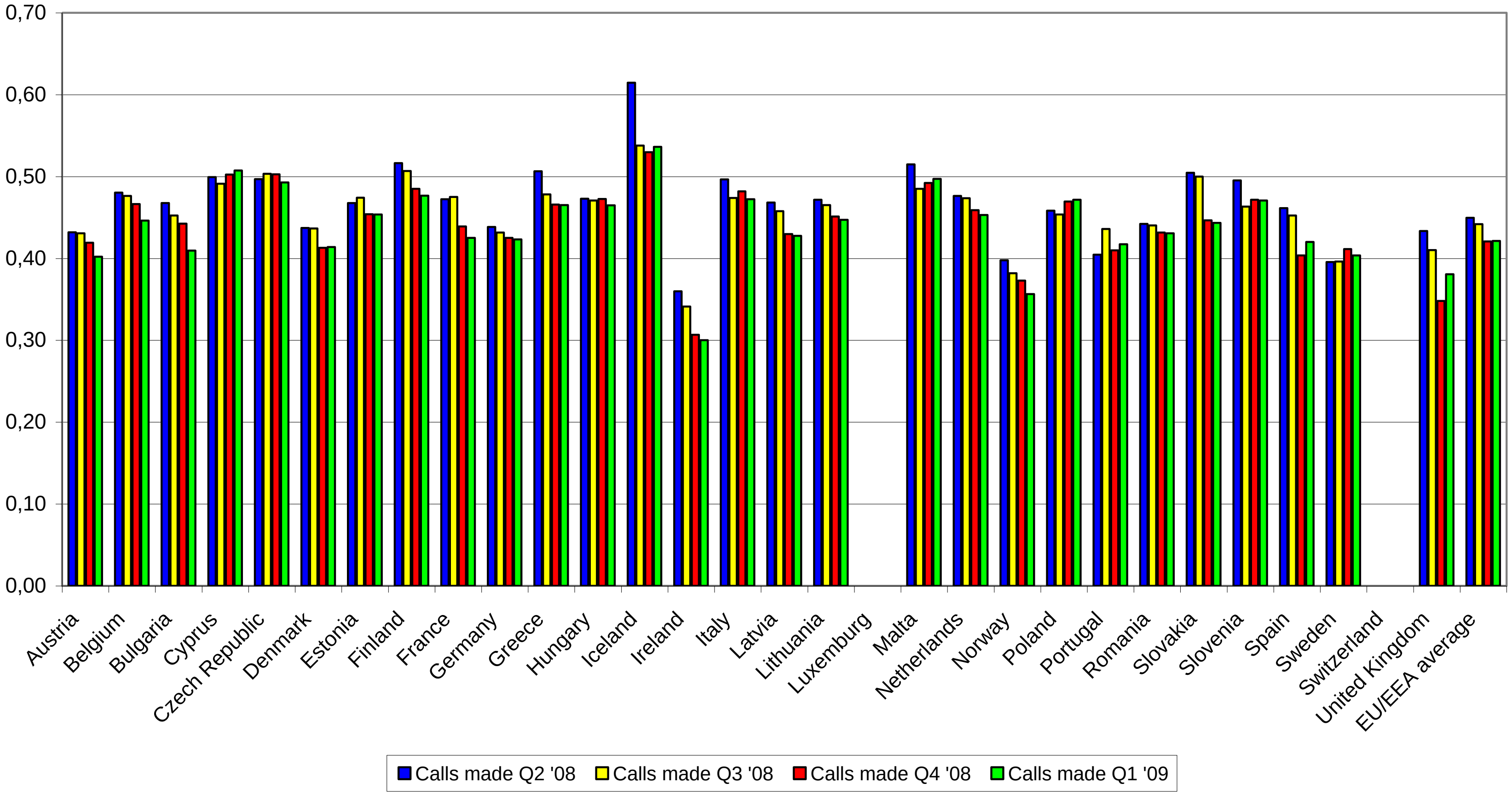
Figure 2: Average retail price per minute voice call received for all consumers (excluding special corporate): Eurotariff and other EU/EEA tariffs (based on billed minutes)



EU/EEA average: Eurotariff Q4 2008 = € 0.203; Eurotariff Q1 2009 = € 0.199; Other EU/EEA tariffs Q4 2008 = € 0.165; Other EU/EEA tariffs Q1 2009 = € 0.160.

Figure 2 indicates that for calls received, on average the Eurotariff was below the regulated tariff of € 0.22. Again, the chart also shows that there exist interesting alternative EU/EEA tariffs, although there is considerable variation by country. Also, the average alternative tariff for calls received shows a bigger deviation from the level of the regulated cap than for calls made.

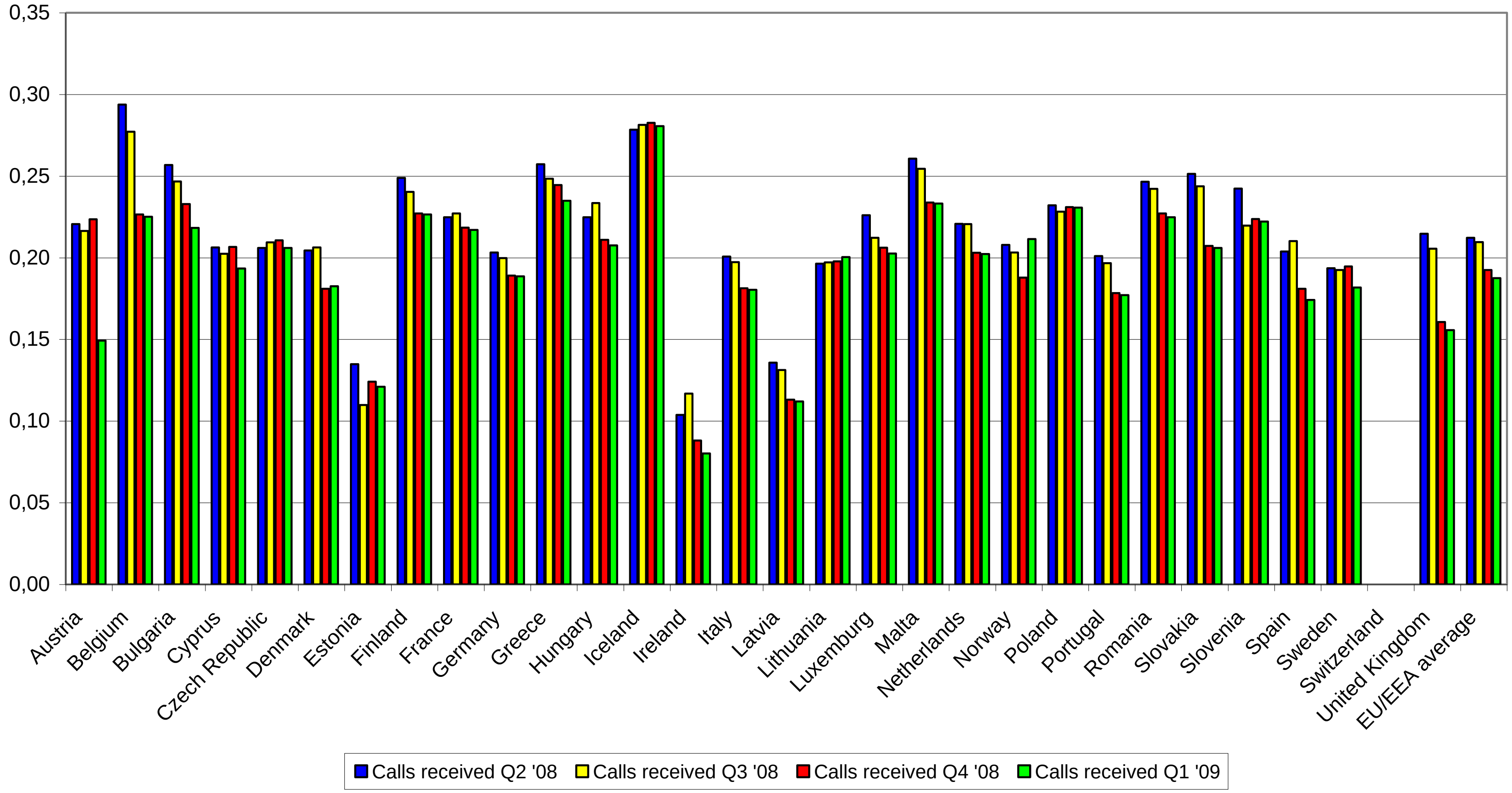
Figure 3: Average retail price per minute voice call made for all consumers (excluding special corporate): average of Eurotariff and other EU/EEA tariffs (based on billed minutes)



EU/EEA average: Q2 2008 = € 0.449; Q3 2008 = € 0.442; Q4 2008 = € 0.421; Q1 2009 = € 0.421.

Figure 3 shows that the average price for making voice calls within the EU (considering both the Eurotariff and other EU/EEA tariffs) shows a moderate decrease, in line with the lowering of the regulated cap.

Figure 4: Average retail price per minute voice call received for all consumers (excluding special corporate): average of Eurotariff and other EU/EEA tariffs (based on billed minutes)



EU/EEA average: Q2 2008 = € 0.212; Q3 2008 = € 0.210; Q4 2008 = € 0.192; Q1 2009 = € 0.187.

Figure 4 shows a similar picture to that of Figure 3, but for calls received. It appears the lower averages for other EU/EEA tariffs (as seen in Figure 2) are leading to lower total averages for calls received.

Figure 5: EU/EEA average prices per minute for retail voice calls made (based on billed minutes)

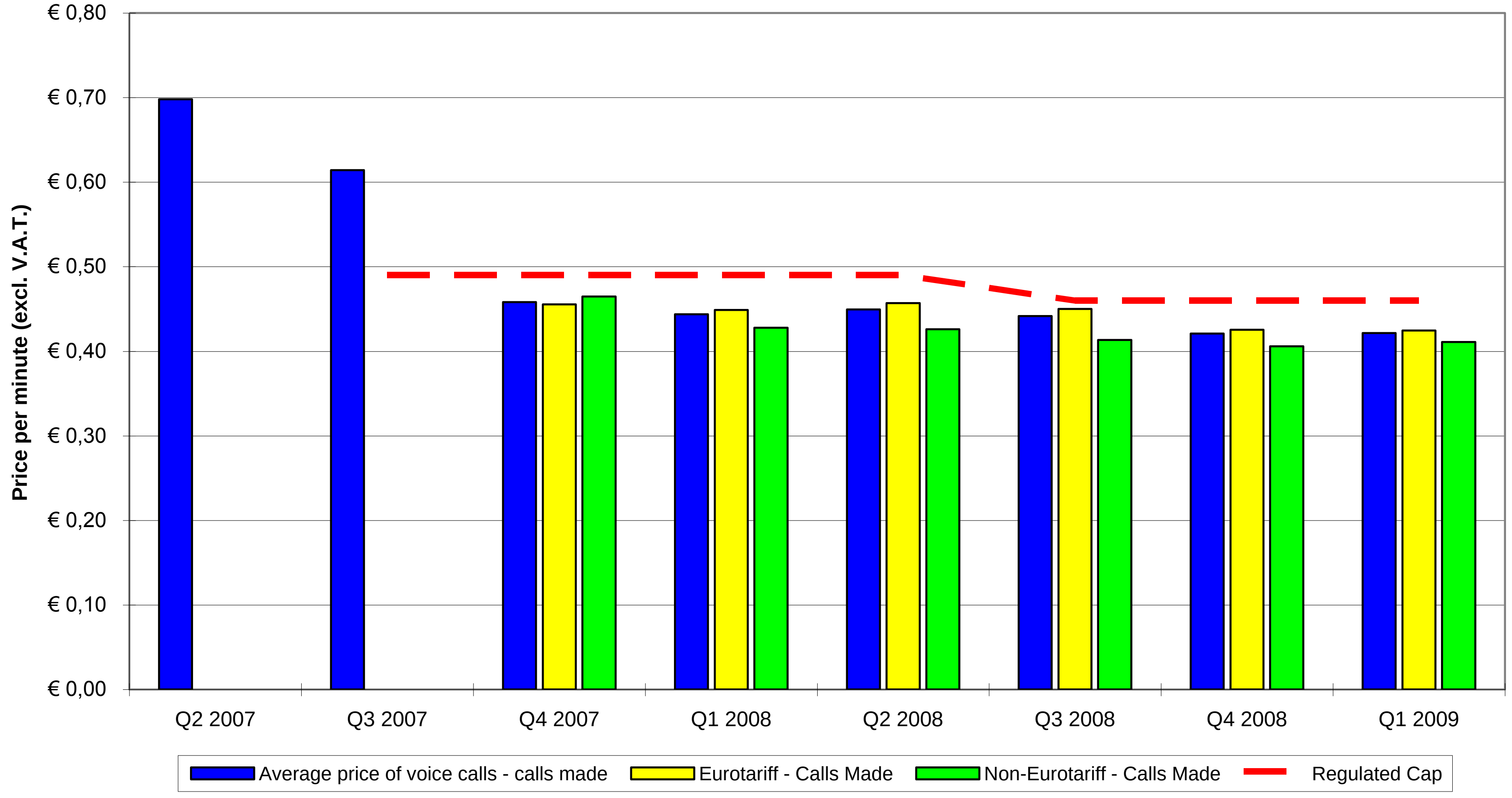


Figure 5 demonstrates how the average price for calls made has come down since introduction of the 2007 Regulation and that both Eurotariff and non-Eurotariff averages are below the Eurotariff cap.

Figure 6: EU/EEA average prices per minute for retail voice calls received (based on billed minutes)

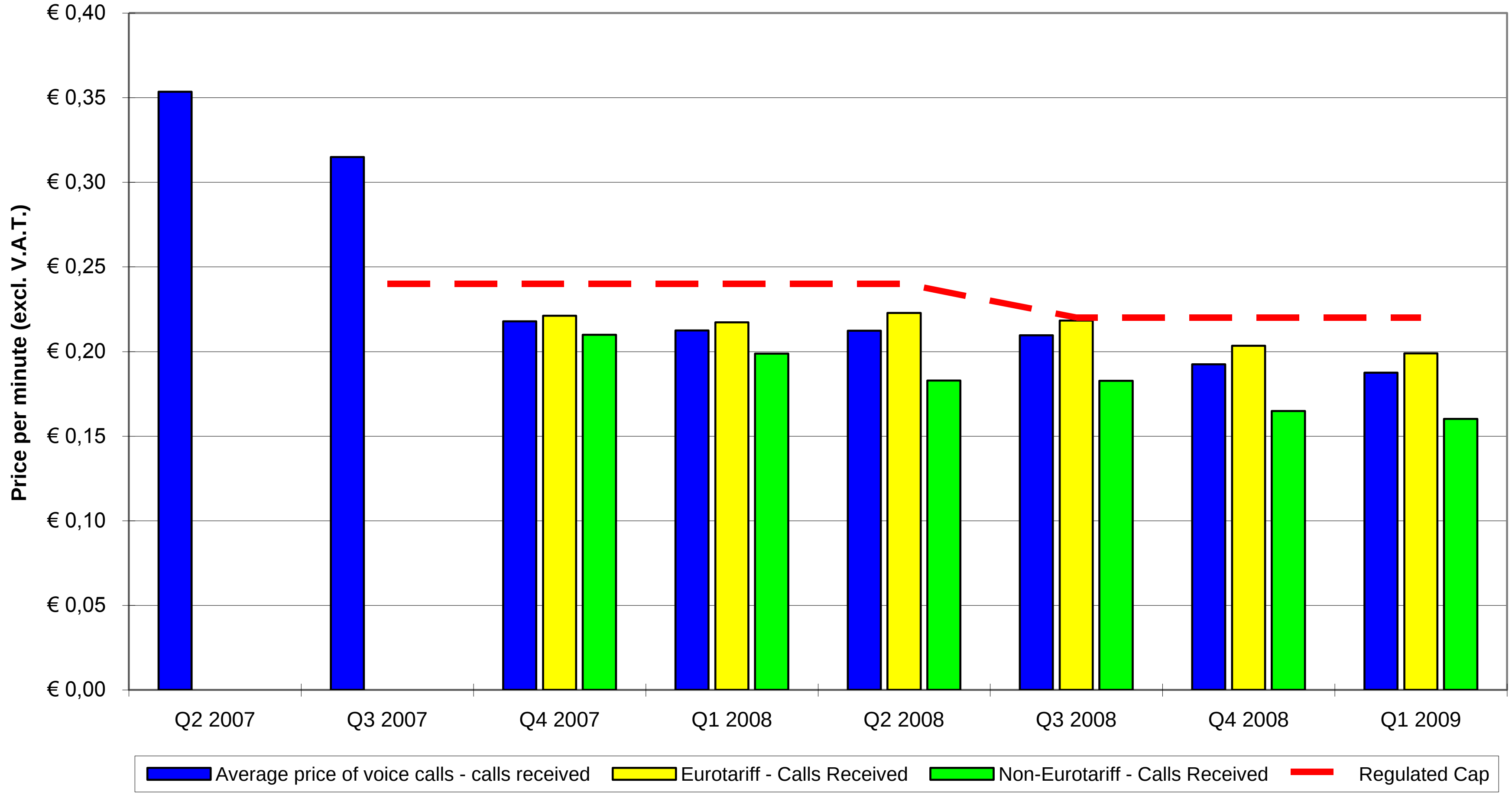
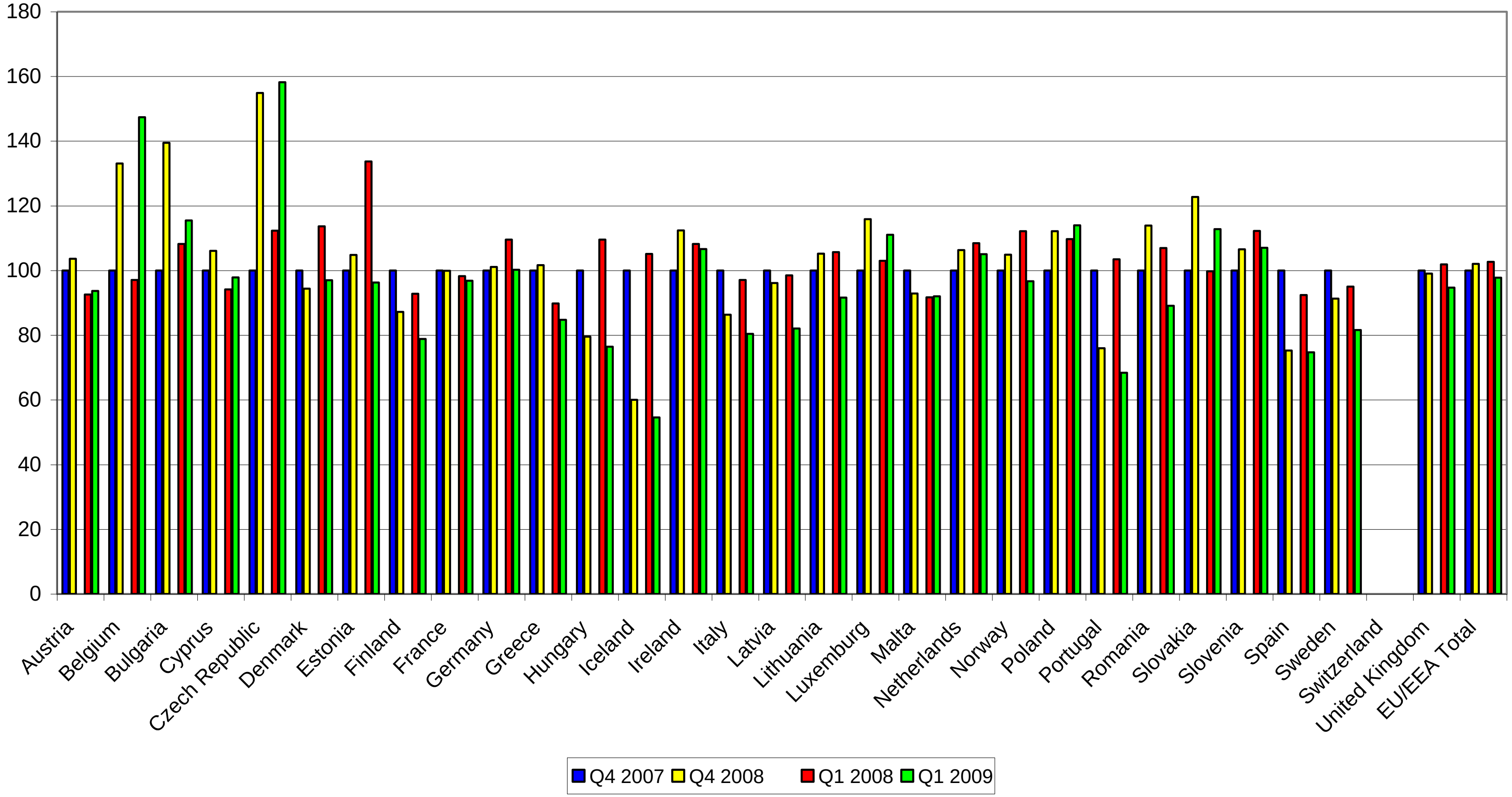


Figure 6 is similar to Figure 5, but now for calls received. The data suggests that for calls received there are non-Eurotariff offers that offer a better deal then the standard Eurotariff.

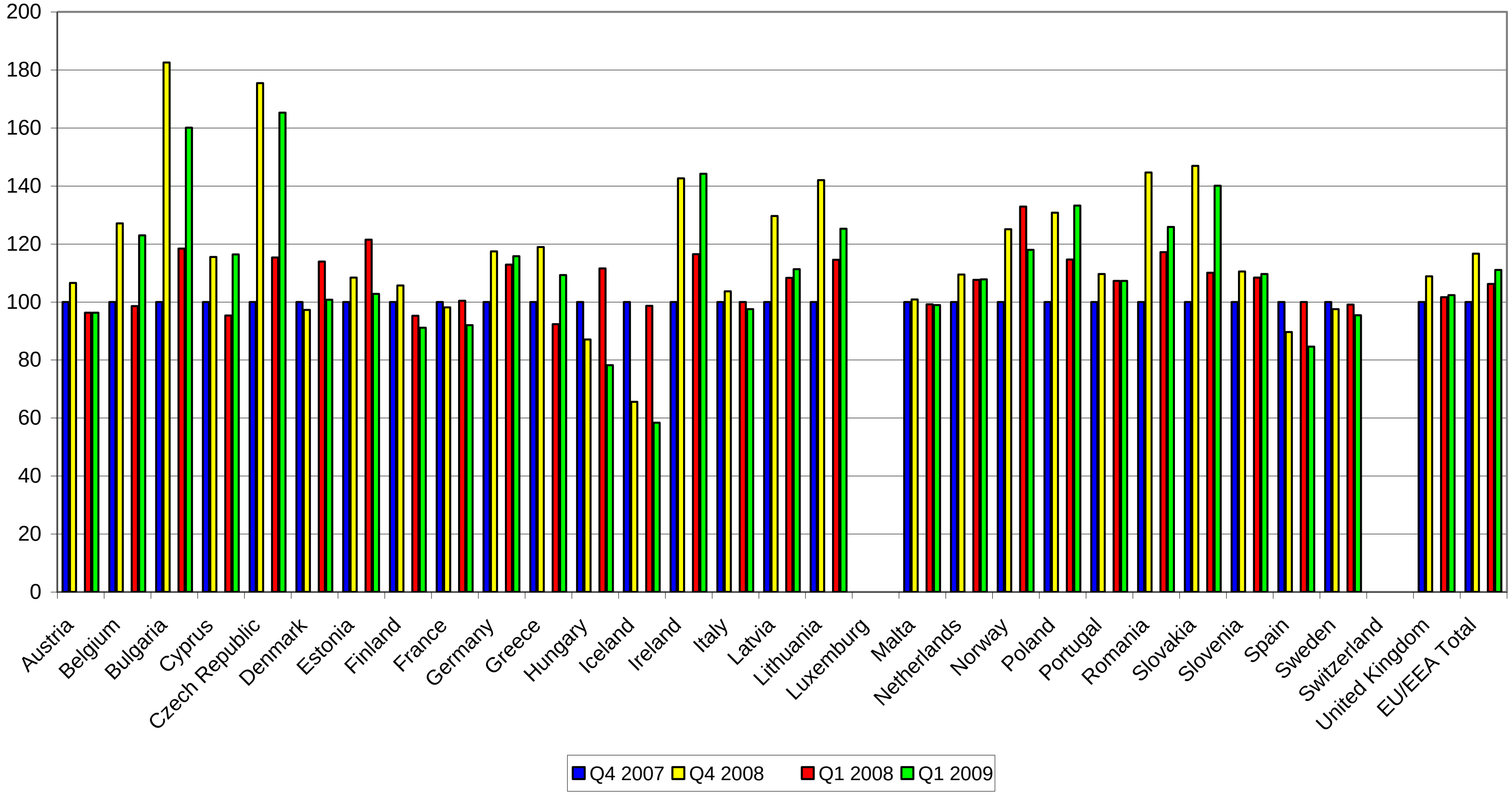
Figure 7: Volumes of EU/EEA calls made (all consumers excluding special corporate)
(Actual minutes, Q4 2007 = 100)



EU/EEA average: Q4 2007 = 100; Q4 2008 = 102.05; Q1 2008 = 102.67; Q1 2009 = 97.77.

Figure 7 shows the year-on-year changes in the volumes of billed minutes for calls made. The EU/EEA average suggests that while the Q4 2008 volumes were slightly above the volume in Q4 2007, the volume for Q1 2009 was slightly below that for the previous year, Q1 2008.

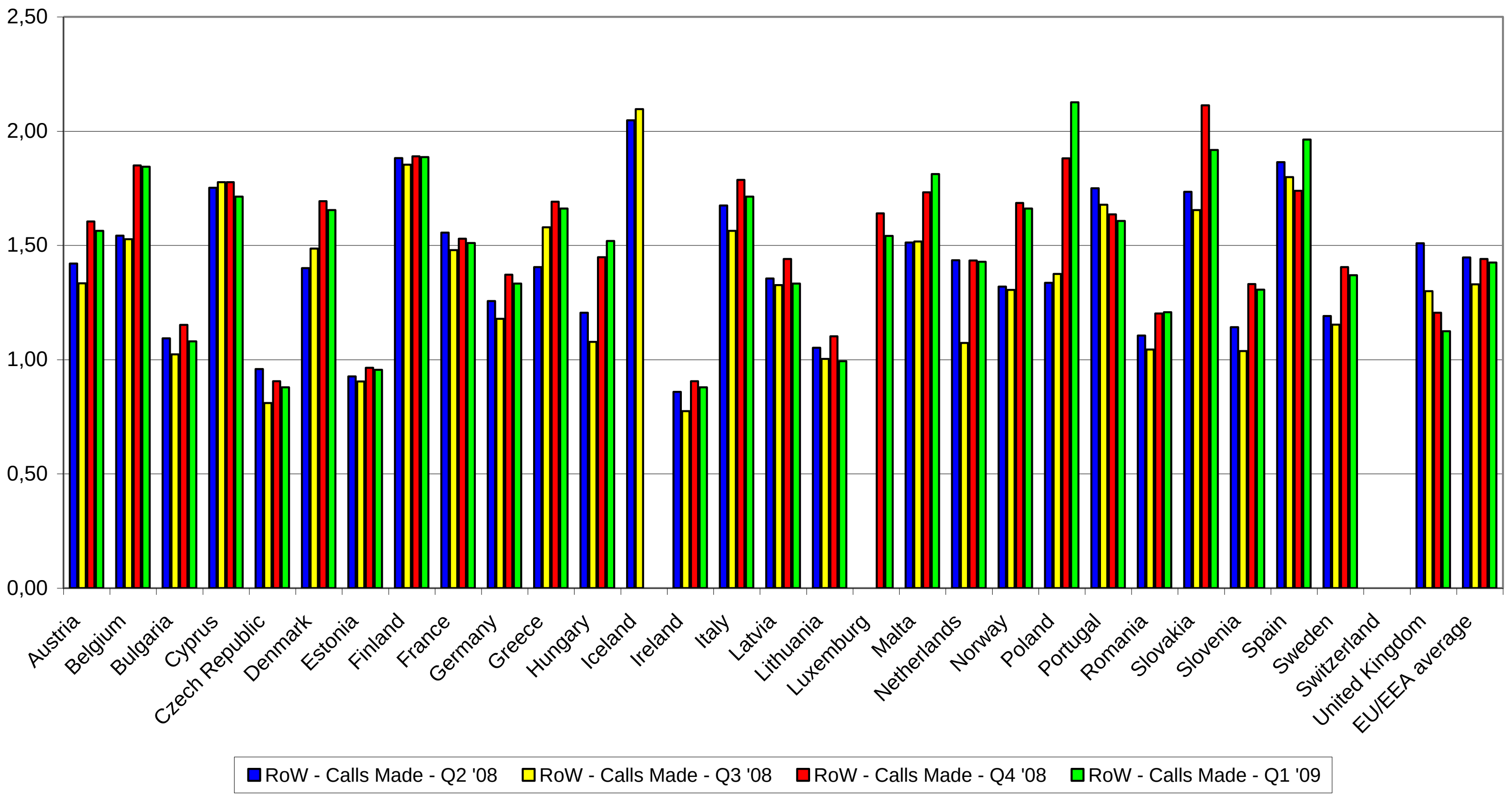
Figure 8: Volumes of EU/EEA calls received (all consumers excluding special corporate)
(Actual minutes, Q4 2007 = 100)



EU/EEA average: Q4 2007 = 100; Q4 2008 = 116.66; Q1 2008 = 106.15; Q1 2009 = 111.04.

Figure 8 shows the year-on-year changes in the volumes of billed minutes for calls received. Contrary to the volumes shown in Figure 7, this figure shows that volumes have increased compared to the volume a year earlier for both the Eurotariff and alternative tariffs.

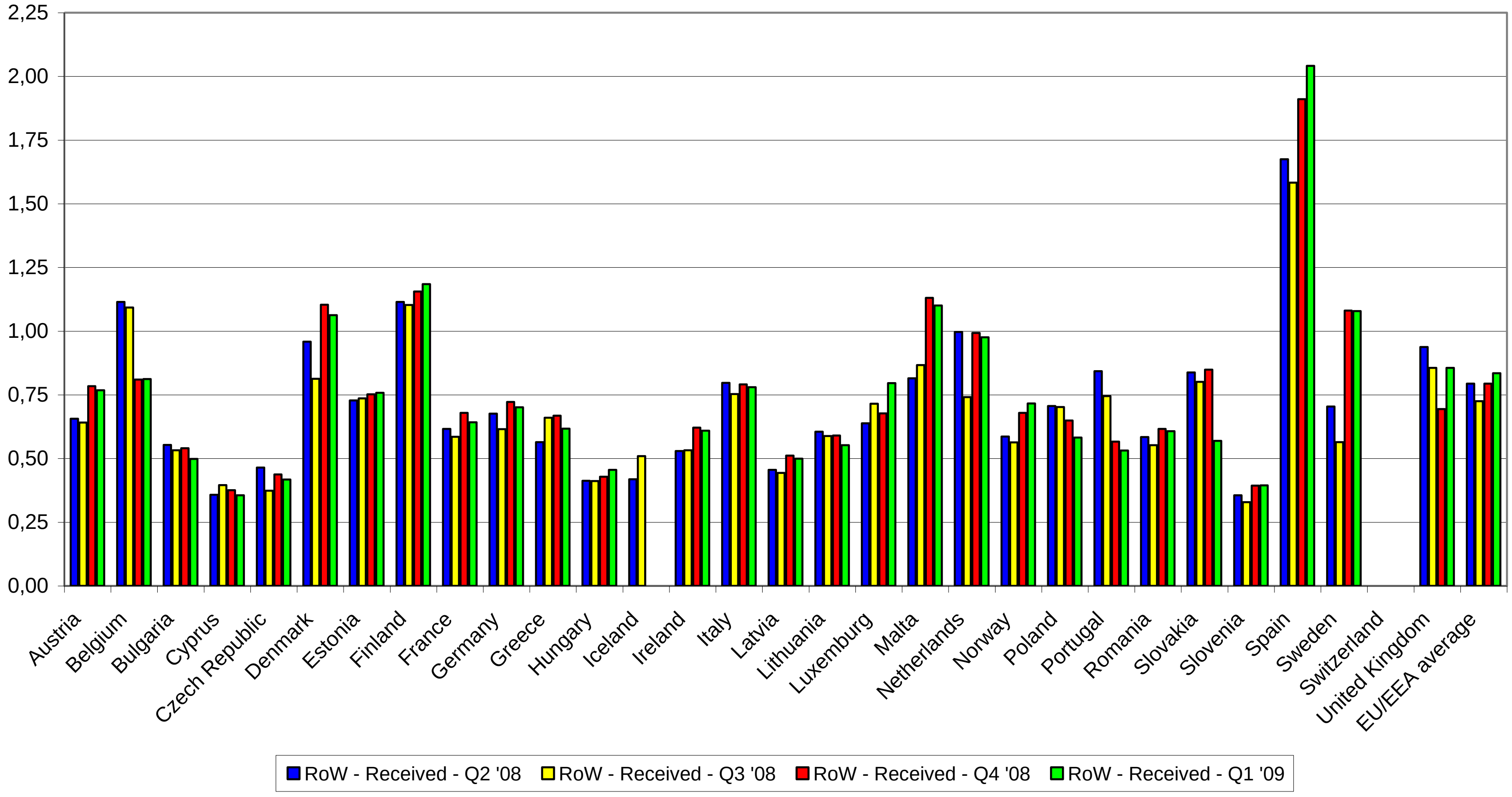
Figure 9: Average retail price per minute voice call made for all consumers (excluding special corporate): Rest of World tariffs (based on billed minutes)



EU/EEA average: Q2 2008 = € 1.447; Q3 2008 = € 1.330; Q4 2008 = € 1.441; Q1 2009 = € 1.425.

Figure 9 gives an overview of developments in average prices for making calls from the EU/EEA to non-EU/EEA countries, from non-EU/EEA countries to the EU/EEA, or between non-EU/EEA countries. ERG considers fluctuations in average prices by country are likely to be influenced by seasonal effects.

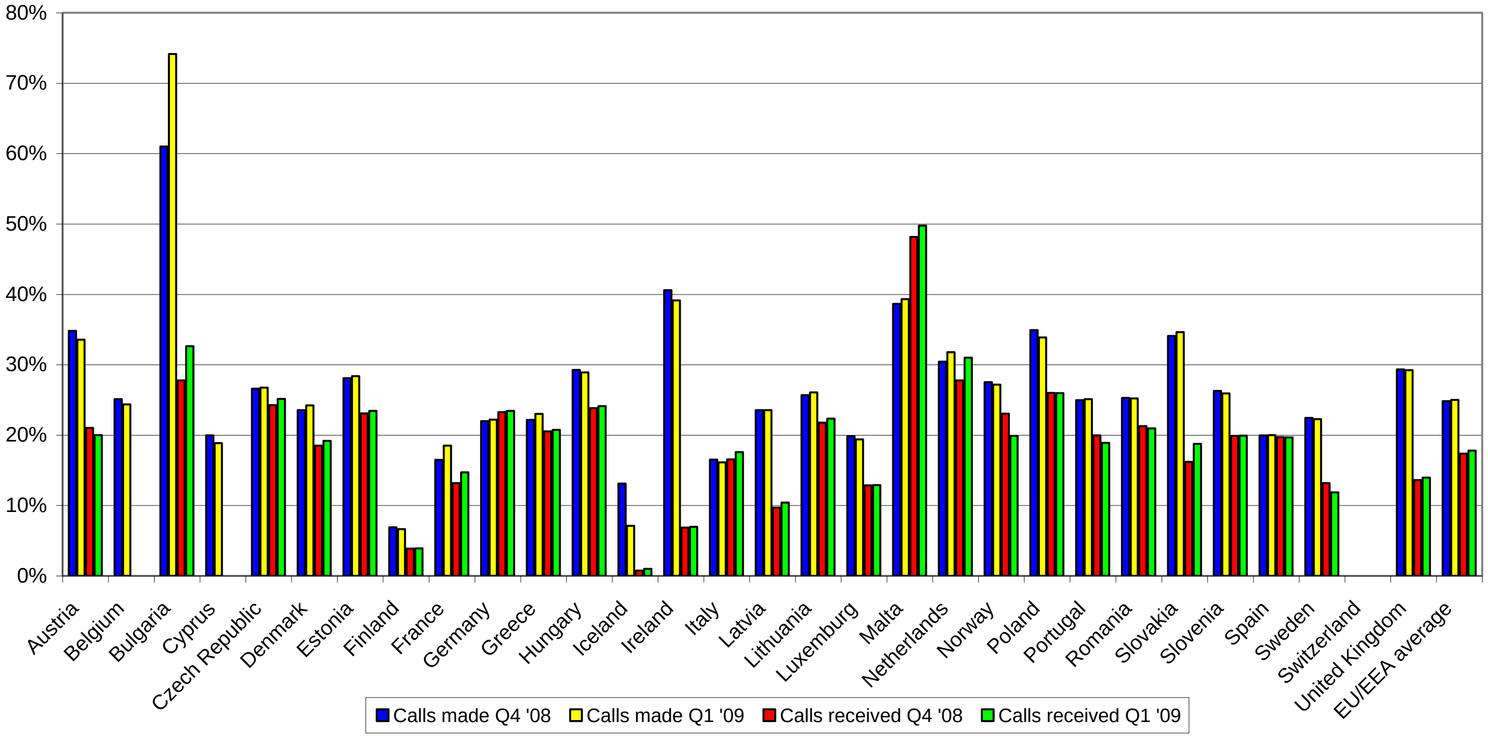
Figure 10: Average retail price per minute voice call received for all consumers (excluding special corporate): Rest of World tariffs (based on billed minutes)



EU/EEA average: Q2 2008 = € 0.794; Q3 2008 = € 0.725; Q4 2008 = € 0.794; Q1 2009 = € 0.835.

Figure 10 shows a similar picture to Figure 9, but for calls received in the EU/EEA and originating in non-EU/EEA countries, or calls received in non-EU/EEA countries and originating inside or outside the EU/EEA. Again, there is no obvious trend.

Figure 11: Surcharge as a result of billed minutes for voice calls made and received for all consumers (excluding special corporate): Eurotariff

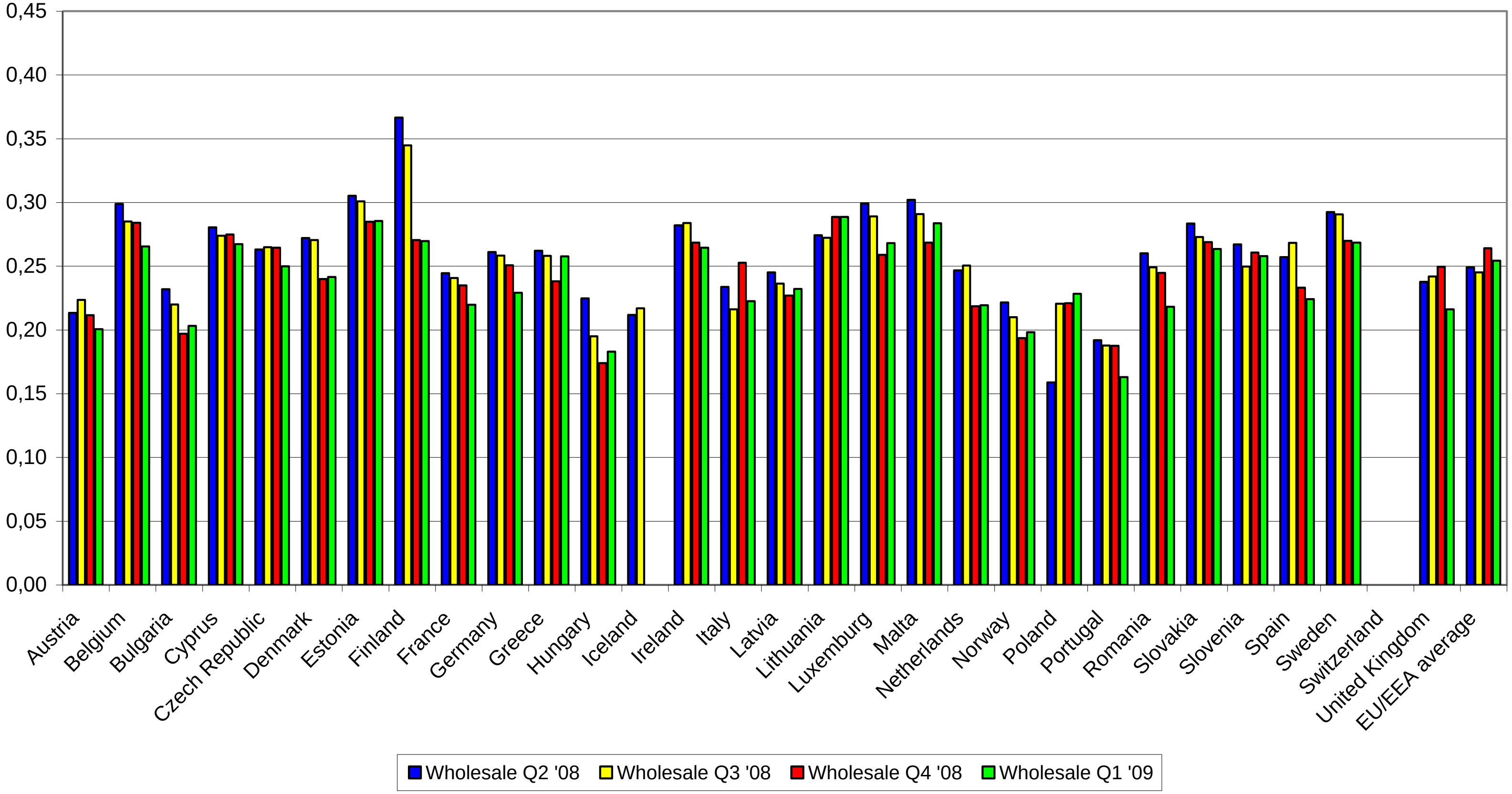


EU/EEA average: Calls made Q4 2008 = 24.8%; Calls made Q1 2009 = 25%; Calls received Q4 2008 = 17.4%; Calls received Q1 2009 = 17.8%.

Figure 11 illustrates the effects of billing unitisation, whereby the average price calculated on the basis of billed minutes is higher than that calculated on the basis of actual minutes. The effect seems to be more pronounced for calls made than for calls received.

Wholesale voice

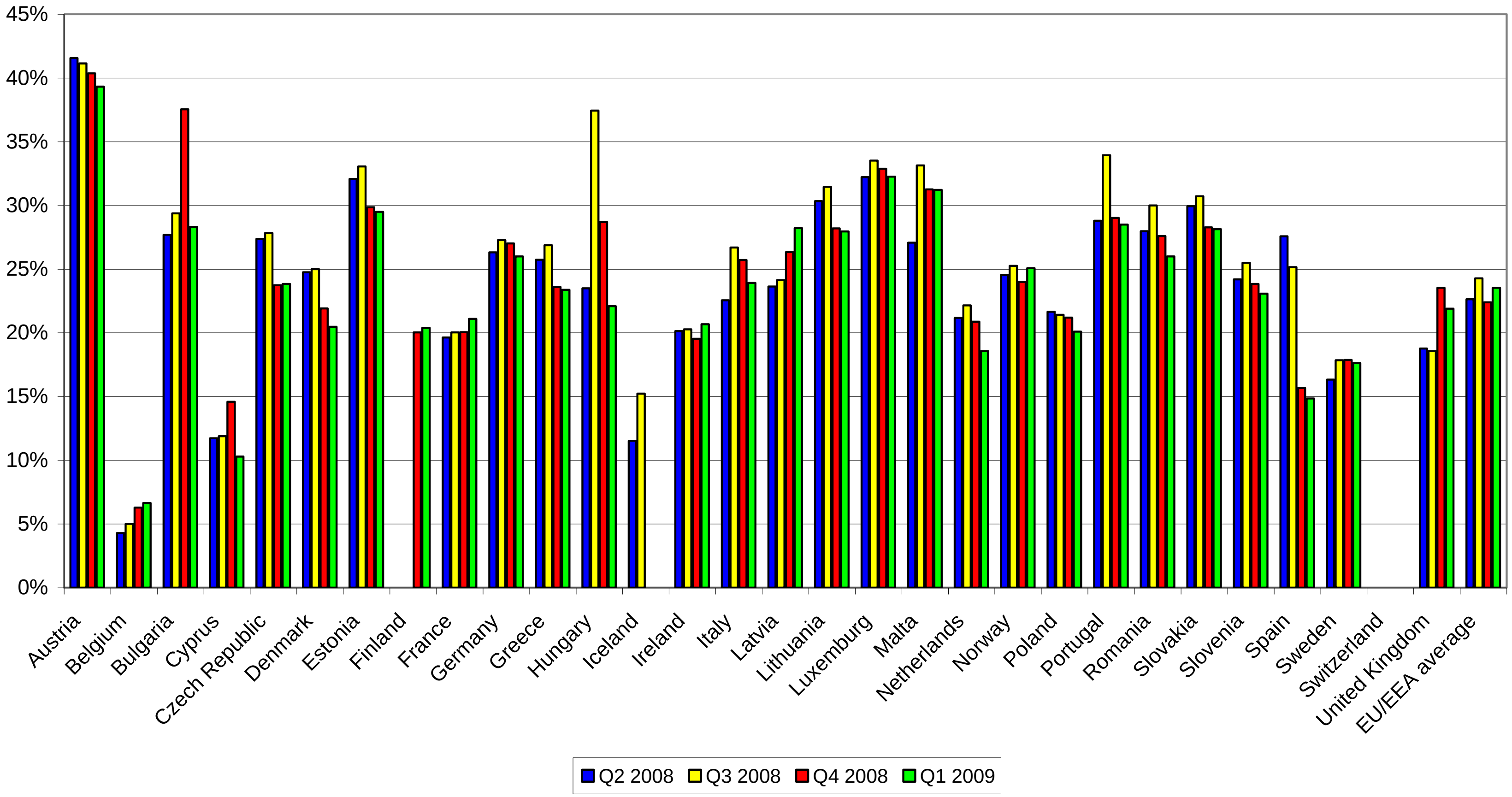
Figure 12: Average wholesale price per minute voice call: EU/EEA, non-group companies (based on billed minutes)



EU/EEA average: Q2 2008 = € 0.249; Q3 2008 = € 0.245; Q4 2008 = € 0.264; Q1 2009 = € 0.254.

Figure 12 illustrates average prices at the wholesale level. The averages illustrate little movement over the last 4 quarters.

Figure 13: Surcharge as a result of billed minutes for wholesale voice calls (EU/EEA, non-group companies)



EU/EEA Average: Q2 2008 = 22.6%; Q3 2008 = 24.3%; Q4 2008 = 22.4%; Q1 2009 = 23.5%.

Figure 13 illustrates the effects of billing unitisation, whereby the average price calculated on the basis of billed minutes is higher than that calculated on the basis of actual minutes. The effect seems similar to that shown in Figure 11 for the Retail level.

Figure 14: EU/EEA averages prices per minute for wholesale non-group voice calls (based on billed minutes)

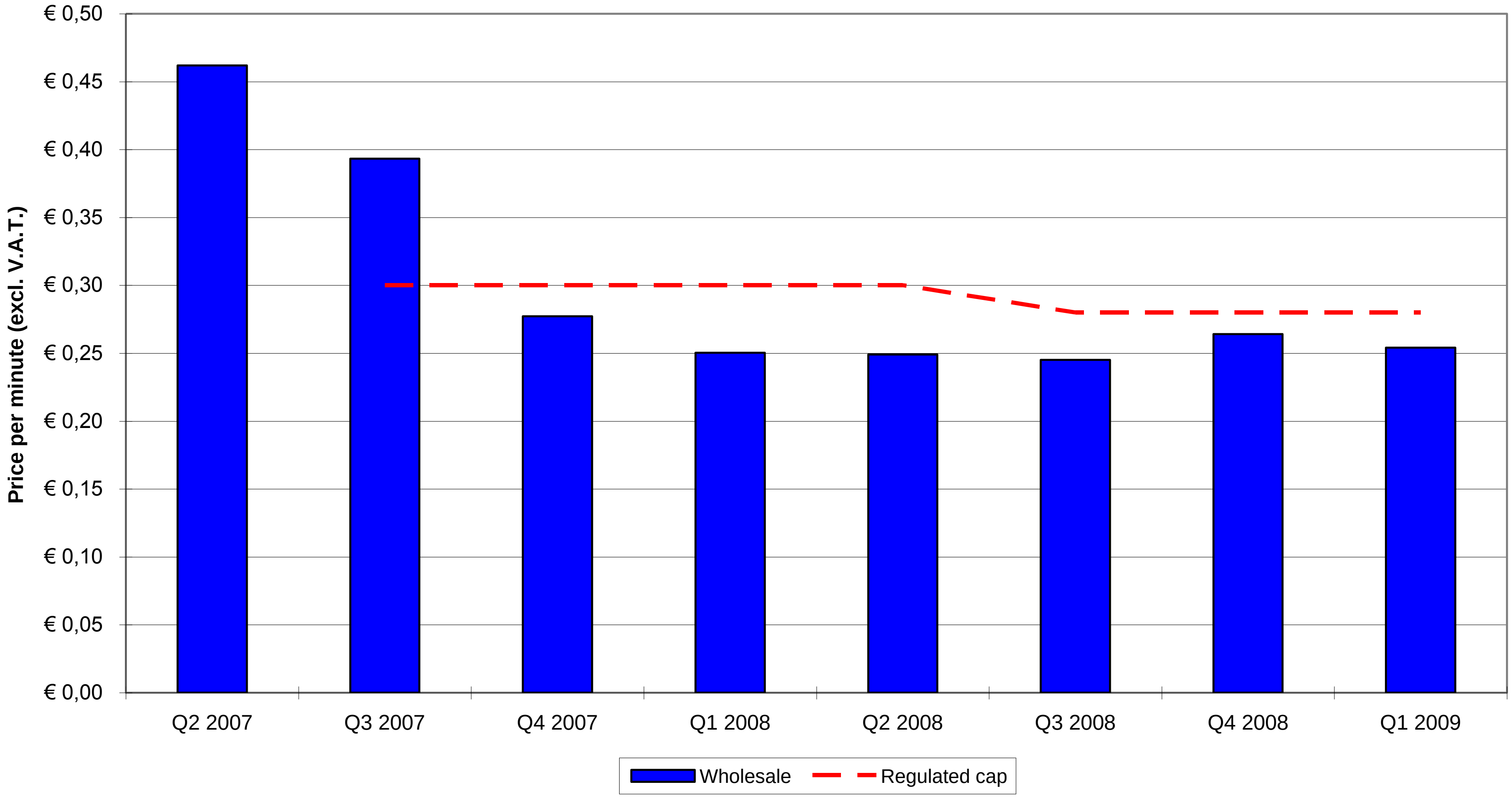
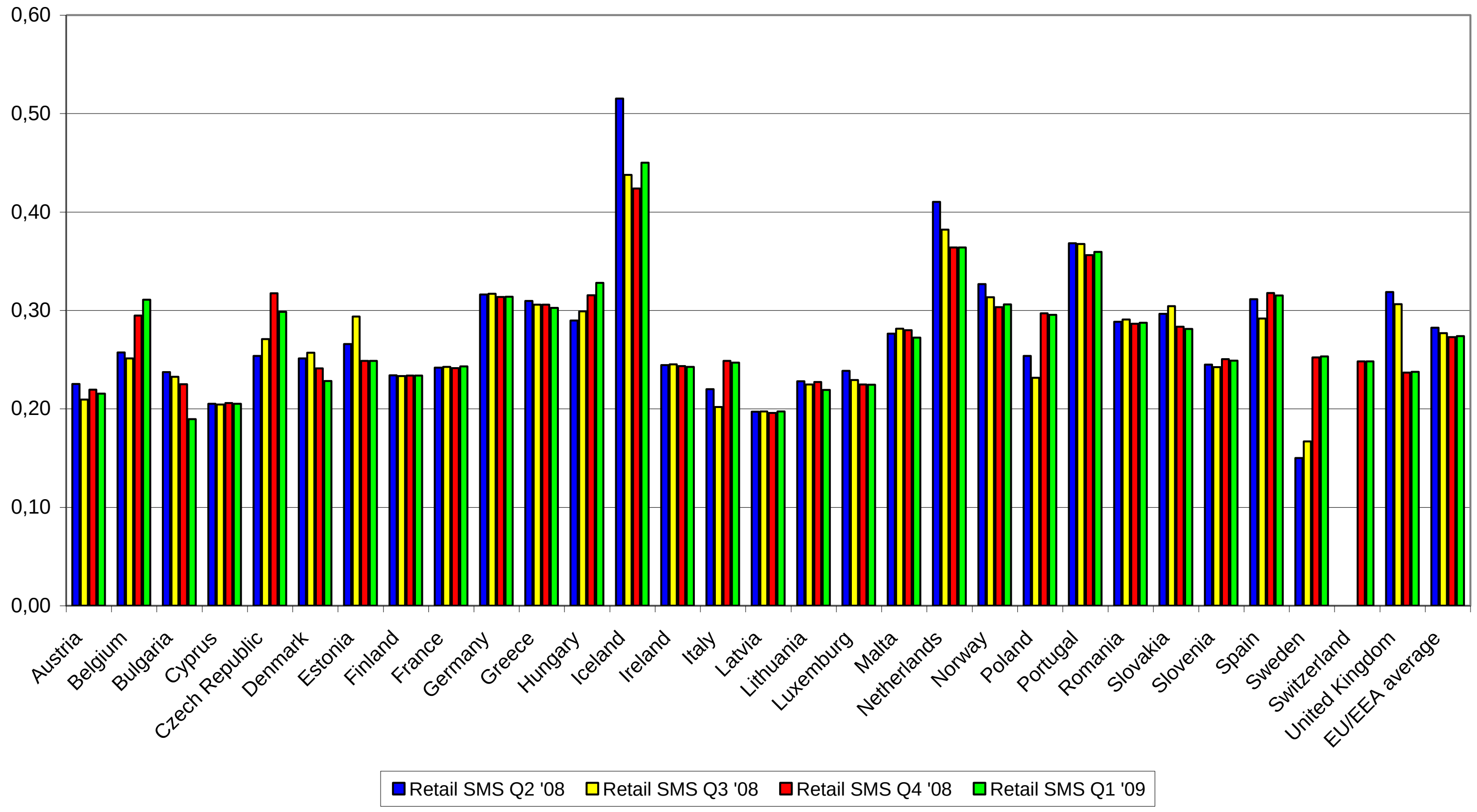


Figure 14 illustrates the EU/EEA average price at the wholesale level from Q2 2007 until Q1 2009. It illustrates the clear drop in the average soon after the implementation of the 2007 Regulation. Since then the prices seem to have stabilised.

Retail SMS

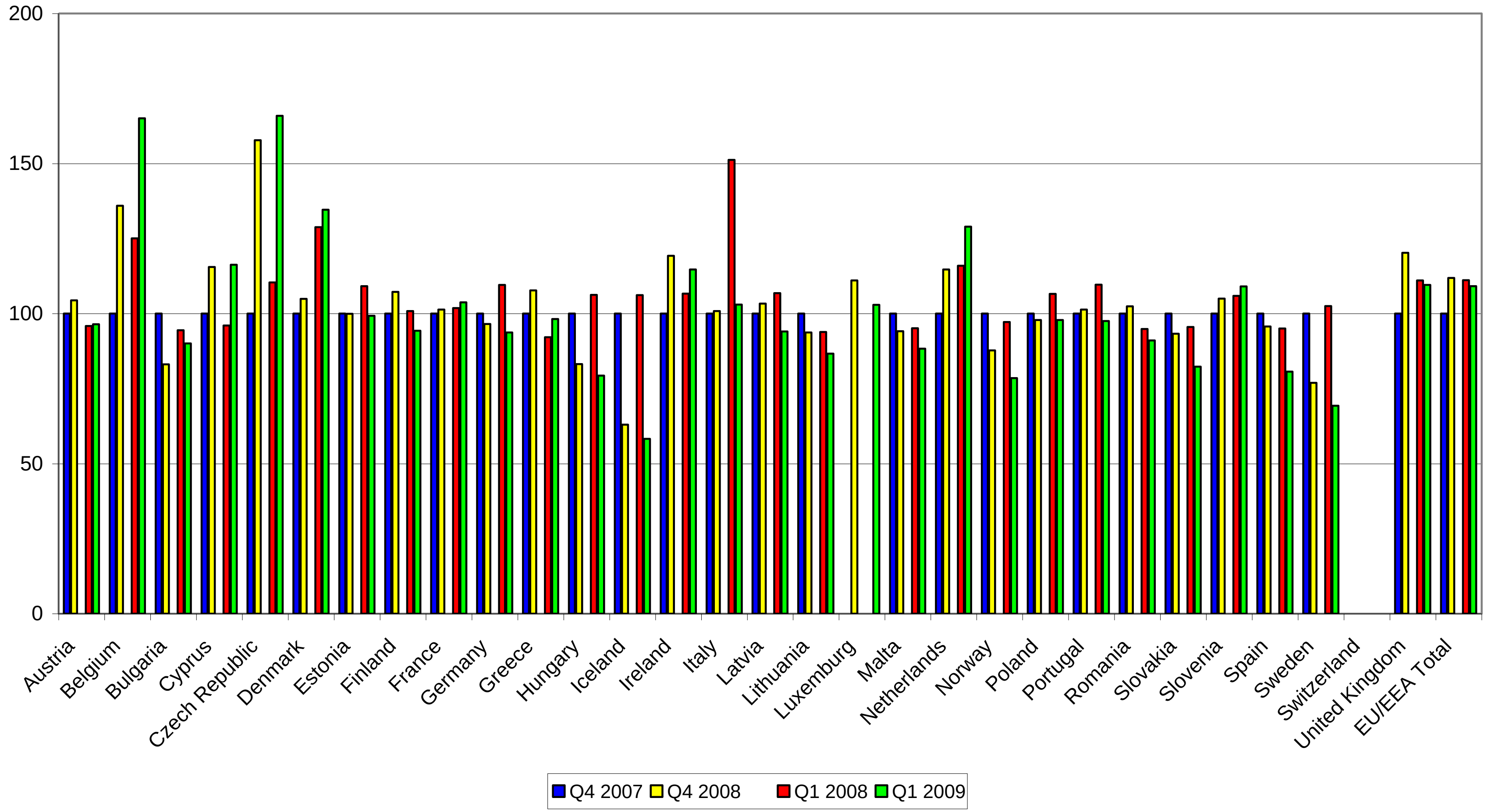
Figure 15: Average retail price per SMS: EU/EEA



EU/EEA average: Q2 2008 = € 0.282; Q3 2008 = € 0.277; Q4 2008 = € 0.273; Q1 2009 = € 0.274.

Figure 15 gives an overview of the development in the average price for sending an SMS within the EU/EEA. The average price has remained relatively stable, with some variation between countries. An average price reduction of around 60% will be necessary to ensure compliance with the new price cap.

Figure 16: Volumes of retail EU/EEA SMS sent (Q4 2007 = 100)



EU/EEA average: Q4 2007 = 100; Q4 2008 = 111.84; Q1 2008 = 111.12; Q1 2009 = 109.16.

Figure 16 shows the development of SMS volumes.

Figure 17: EU/EEA trends in volume for retail voice calls and SMS (Q4 2007 = 100)

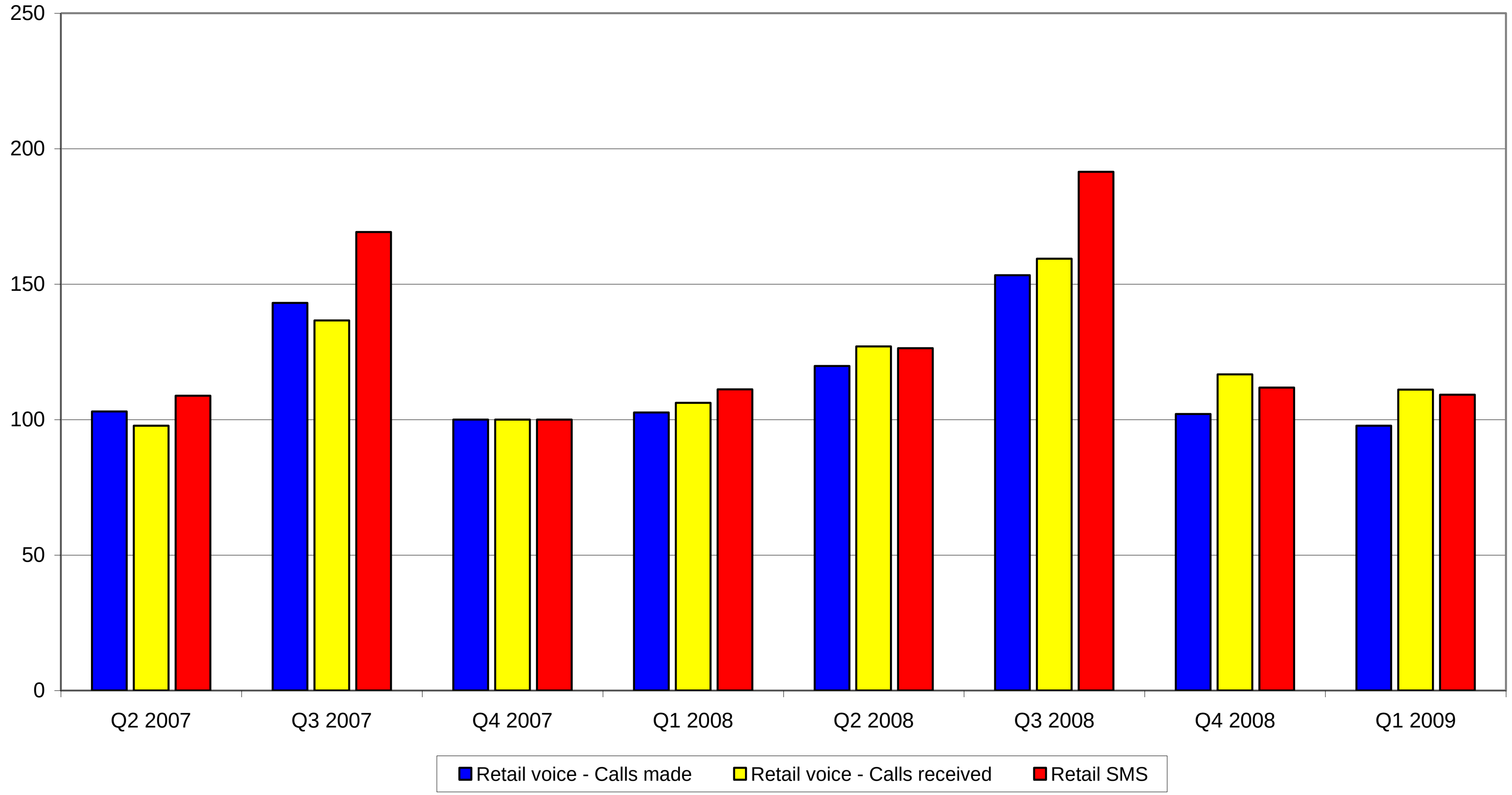
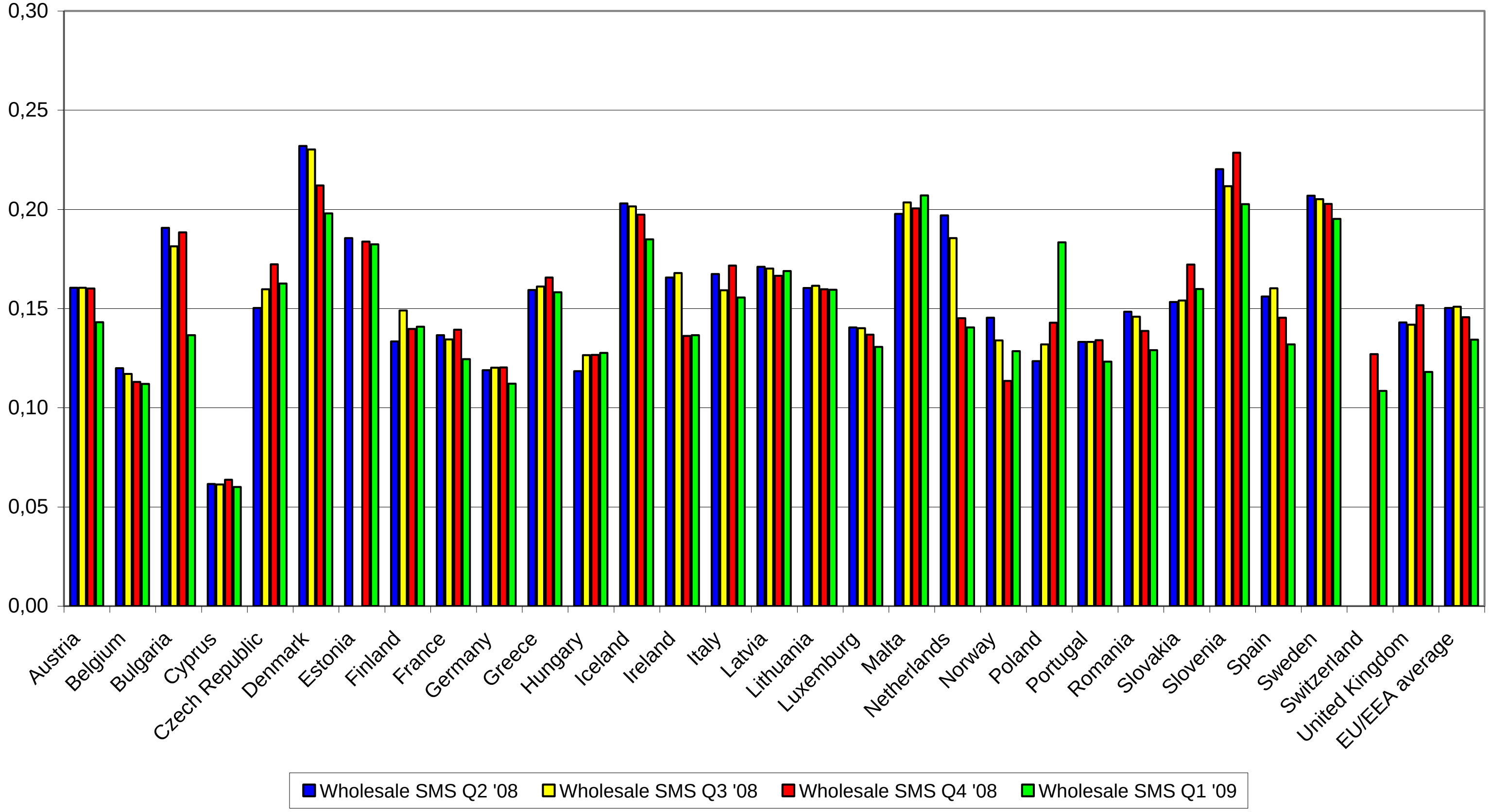


Figure 17 compares the changes in EU/EEA volumes for both types of retail voice calls with the volumes of SMS messages sent. It shows a similar trend, largely seasonal, with a slightly larger growth in volumes for both SMS sent and calls received than for calls made.

Wholesale SMS

Figure 18: Average wholesale price per SMS: EU/EEA, non-group companies

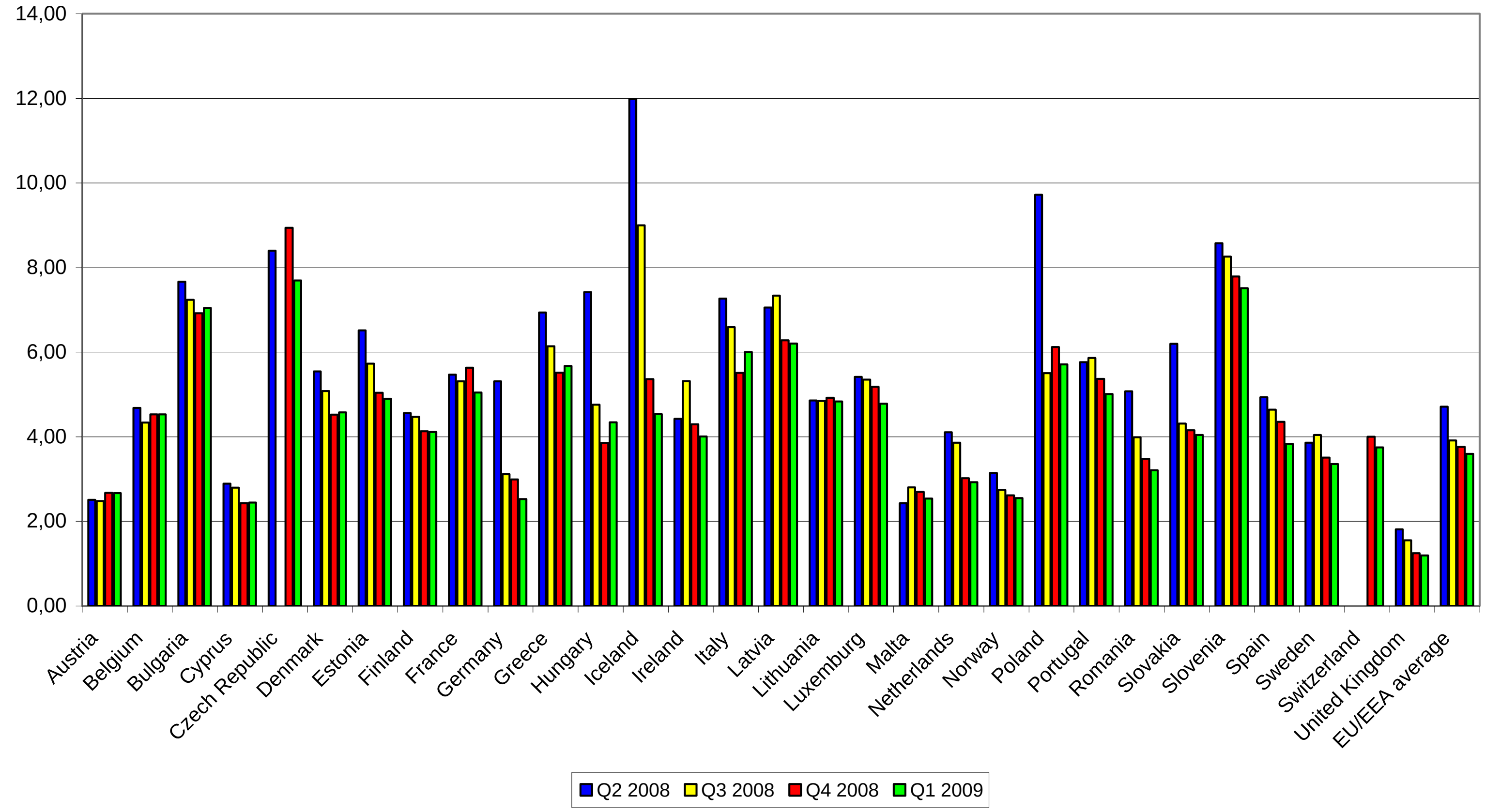


EU/EEA average: Q2 2008 = € 0.150; Q3 2008 = € 0.151; Q4 2008 = € 0.146; Q1 = € 0.134.

Figure 18 is similar to Figure 15, but at the wholesale level. The average price has remained fairly constant, with a minor decrease in Q1 2009. Recent average prices have been over 60% higher than the cap for the new Euro-SMS tariff.

Retail data

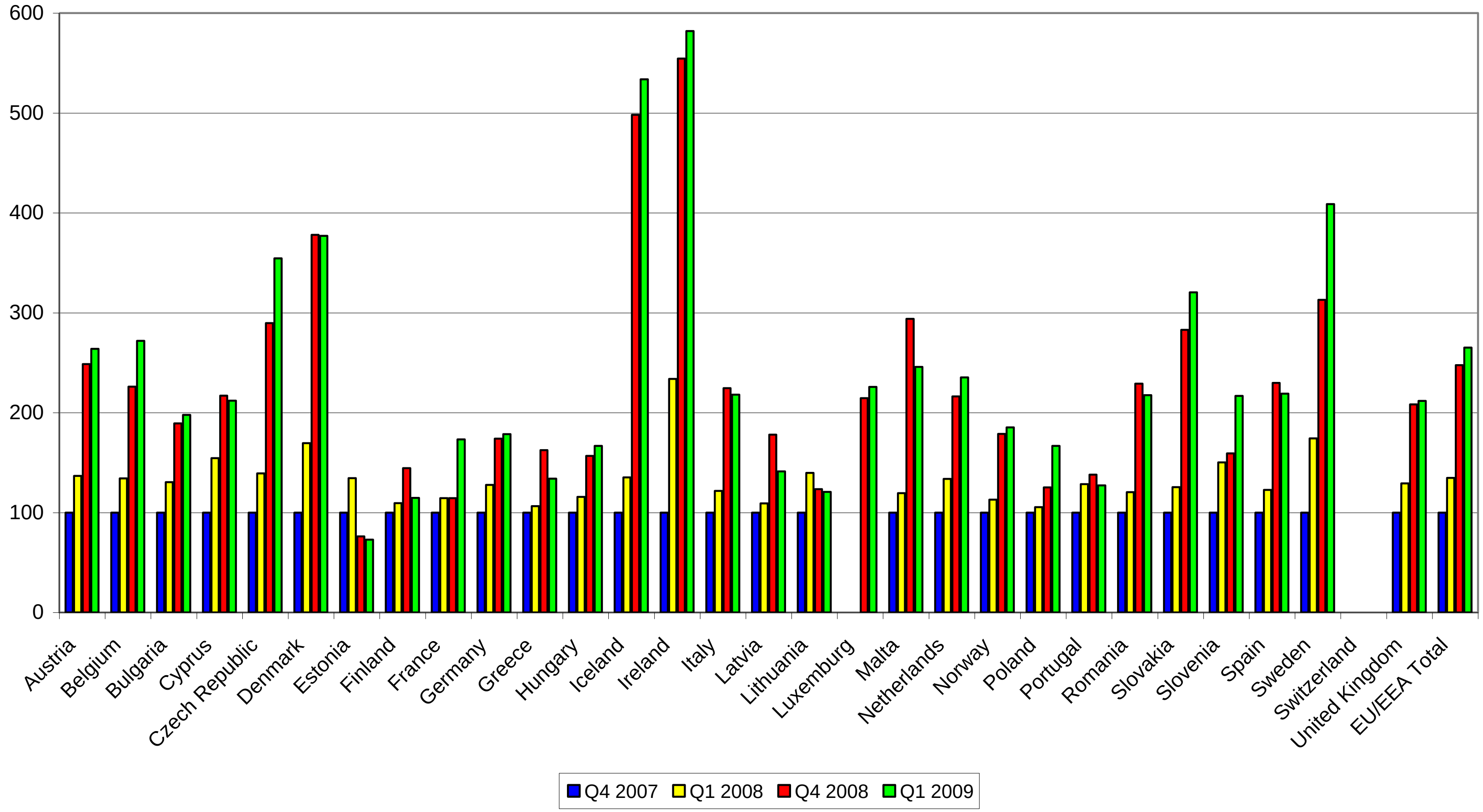
Figure 19: Average EU/EEA off-net retail price per data MB (based on billed megabytes)



EU/EEA average: Q2 2008 = € 4.707; Q3 2008 = € 3.913; Q4 2008 = € 3.757; Q1 2009 = € 3.592.

Figure 19 shows the trend in off-net retail prices for data services. The downward trend noted in the last report still appears to be present but has recently been rather weak. A large variation between countries remains.

Figure 20: Volumes of retail data (Q4 2007 = 100)

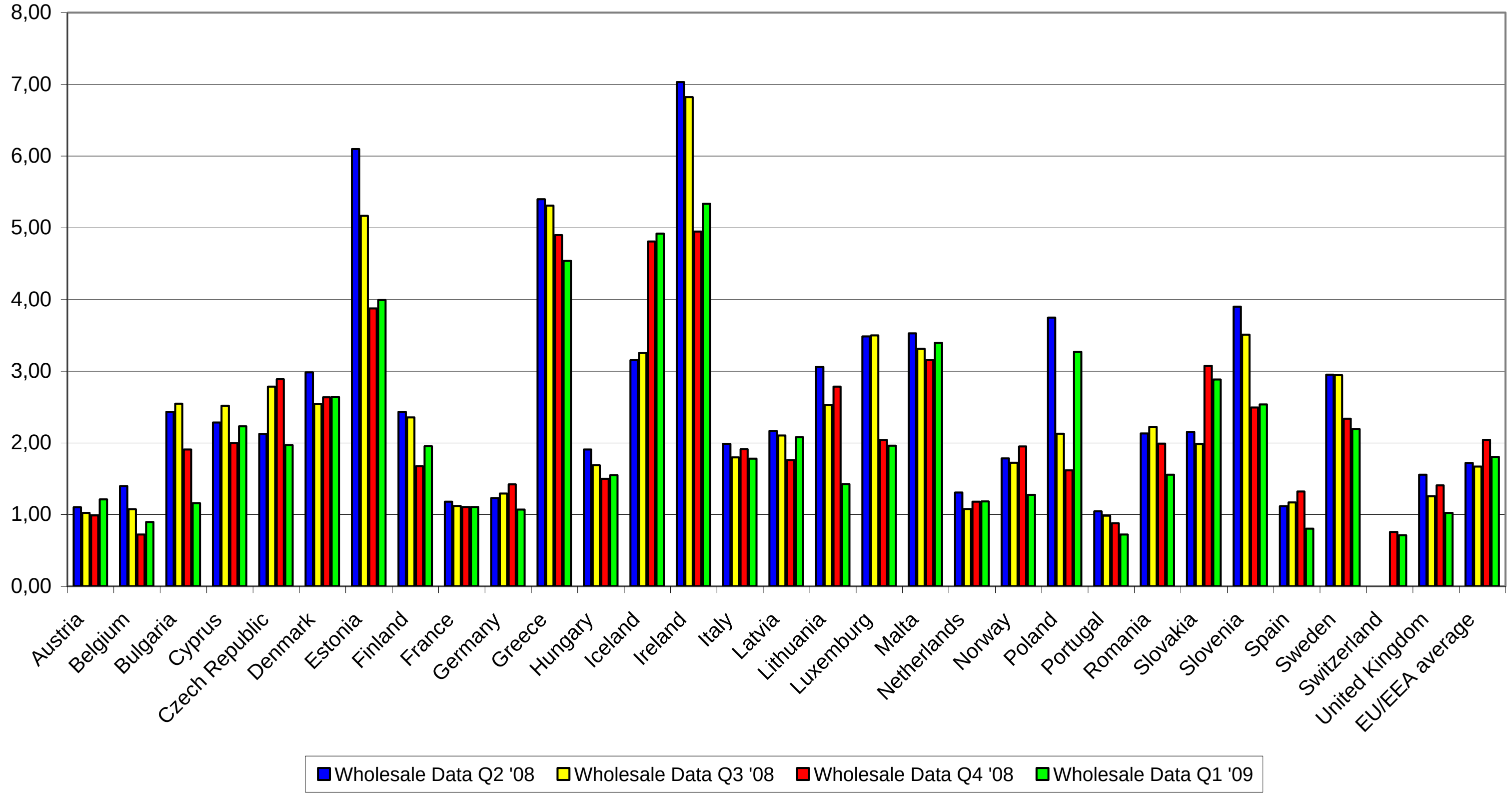


EU/EEA average: Q4 2007 = 100; Q1 2008 = 134.61; Q4 2008 = 247.47; Q1 2009 = 265.12.

Figure 20 shows the continued growth in the volumes of retail data services. Growth in data roaming volumes seems to follow growth in national roaming volumes.

Wholesale data

Figure 21: Average wholesale price per data MB for inbound roaming: EU/ EEA, non-group companies (based on billed megabytes)



EU/EEA average: Q2 2008 = € 1.717; Q3 2008 = € 1.668; Q4 2008 = € 2.040; Q1 2009 = € 1.803.

Figure 21 mainly illustrates a significant variation between countries, with the EU/EEA average remaining fairly stable over the last four quarters. An average price reduction approaching 50% is necessary to ensure compliance with the new wholesale safeguard cap in the 2009 Regulation.

Figure 22: EU/EEA averages for retail and wholesale data

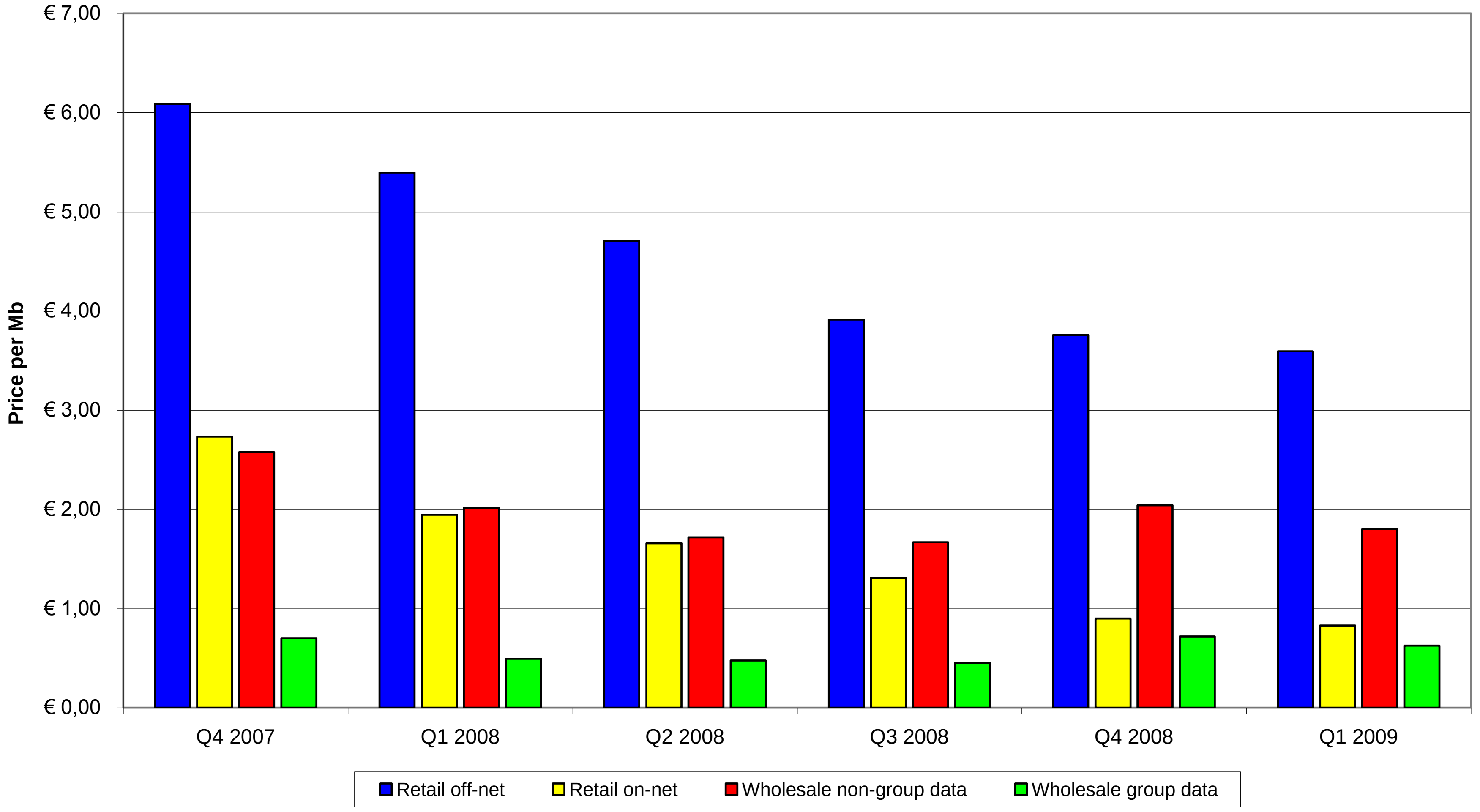


Figure 22 compares the average EU/EEA price trends for retail and wholesale data services. It appears that while prices have continued to decrease at the retail level, this is no longer the case for wholesale prices

Section 4

Further issues

Implementation in EEA-only Member States

4.1 The 2007 Regulation entered into force in Norway, Iceland and Lichtenstein on 22 December 2007, meaning that in those countries, data for the regulated wholesale rate and the Eurotariff is available from quarter 1 2008 only. (Note that one operator in Norway introduced the Eurotariff during quarter 1, meaning that the 'other EU/EEA tariff' data for quarter 1 2008 also includes data from that operator (Figure 1)).

Summary of data 'gaps' and apparently 'anomalous' results

4.2 This round of data collection revealed that there remains a limited number of operators that had some problems supplying reasonable quality data. This is not at all unusual for a comprehensive data collection of this type. In most cases the NRA was able to work with the company to resolve or alleviate the problem. In others cases, where system upgrades will be necessary to comply with the data collection or where systems failures were the source of the problem, the company was asked to provide the best possible estimate currently available and to complete upgrades in time to provide high quality data for the next collection.

4.3 The above is especially true for Switzerland as this Report marks the first time Switzerland has supplied data for the ERG benchmark report. As operators in Switzerland do not fall under the roaming Regulation, they were not able to provide all the information in a similar manner to the other EU/EEA operators. Therefore some charts do not provide information for Switzerland.

Actual/billed minutes

4.4 Although NRAs have put pressure on their operators to supply the figures for actual and billed minutes for voice roaming services, a small number of operators still had problems supplying the requested data. Overall, ERG feels the differences between actual and billed minutes indicated by this Report are a fair reflection of actual practices.

Special retail offer non-Eurotariff

4.5 In Slovenia there is one operator that has a non-Eurotariff plan, which applies to countries that are not part of the EU as well as certain EU countries. The prices included in this non-Eurotariff plan are lower for calls to RoW countries, but higher than the Eurotariff for EU/EEA calls. From 1 June 2008, the plan is no longer available to new customers, however the existing customers that opted-in before that date remain on the plan. This is the cause of the relatively high average of non-Eurotariff calls in Slovenia in Figure 1.

Special retail offers data roaming

4.6 For retail data roaming (Figure 22), there are some operators offering flat-rate domestic subscriptions, which include unlimited international data roaming on selected partner networks in the monthly subscription fee. This leads to very low average on-net retail prices, which do not necessarily reflect the on-net retail tariffs encountered by many consumers in that country.

Wholesale discounts

4.7 At the wholesale level, operators often receive discounts based on variables like volume of traffic, calculated at the end of a 12-month period. When providing data for these reports, operators may estimate the effect of such discounts on data for each quarter. Because the actual discount may vary from the estimate, there may be an apparently 'anomalous' result for the quarter when the discount is actually applied. This should be kept in mind when comparing wholesale figures for different quarters in the same year.

Varying response rate

4.8 A further issue that may cause an apparent change in price between quarters, when tariffs have remained the same, is a variance in the operators that provide reliable data for a particular data category in each quarter. This can also cause strong volume changes.

Exchange rate issues

4.9 For ease of comparison the Euro is used throughout this Report.

4.10 Due to fluctuating exchange rates with countries outside the EU, some of the RoW averages have increased strongly, as they have increased in the local currency. The Polish regulator, UKE, considers that the IOT[13] + 15% method of calculating prices for RoW calls made is an additional cause of the rather large increases, particularly for Poland (Figure 9).

4.11 Within the EU, currency fluctuations between the Euro and other national currencies are also likely to have affected the average prices reported for countries outside the Eurozone.

Overview of compliance issues

4.12 As stated elsewhere in this Report, overall compliance with the provisions of the 2007 Regulation has been very good. All mobile operators offer their consumers a Eurotariff, compliant with the rates set down in Article 4 of the Regulation, wholesale rates appear to have fallen in line with the requirements set out in Article 3 of the Regulation, and consumer transparency has improved.

Future data collection

4.13 ERG intends to continue to collect data on a 6 monthly basis, with data split by quarter. The next period for data collection will therefore be from 1 April 2009 to 30 September 2009. ERG expects to report on this data early next year.

[13] Inter-Operator Tariff

Annex 1

List of respondents

Below are the operators that provided data for the period 1 October 2008 – 31 March 2009.

Austria
Hutchison 3G Austria
Mobilkom Austria
Orange Austria
Telekom Austria
T-Mobile Austria
Yesss!

Belgium
Belgacom Mobile
Mobistar
One Base

Bulgaria
BTC Mobile EOOD
Cosmo Bulgaria Mobile
Mobiltel EAD

Cyprus
Cytamobile-Vodafone
EAD MTN Cyprus (Areeba Ltd)

Czech Republic
Telefónica O2 Czech Republic
T-Mobile Czech Republic
Vodafone Czech Republic

Denmark
3
Sonofon
TDC
TeliaSonera

Estonia
AS EMT
Elisa Eesti AS
OÜ Top Connect
ProGroup Holding OÜ
TELE 2 Eesti AS

Finland
Alands Mobiltelefon Ab
DNA Networks Ltd
Elisa Corporation
TeliaSonera Finland Oyj

France
Bouygues Telecom
Orange Caraïbe
Orange France
SFR
SRR
OMER Telecom

Germany
E-Plus Mobilfunk GmbH &Co. KG
O2 Germany GmbH & Co. OHG
T-Mobile Deutschland GmbH
Vodafone D2 GmbH

Greece
COSMOTE Mobile
Telecommunications S.A.
Vodafone Panafon S.A.
Wind HellasTelecommunications S.A.

Hungary
Pannon GSM Távközlési Zrt
T-Mobile
Vodafone Magyarország Zrt

Iceland
Síminn hf.
Vodafone Iceland

Ireland
Eircom Mobile
Hutchison 3G Ireland
Meteor Mobile Communications
O2 Communications Ireland
Tesco Mobile
Vodafone Ireland

Italy
Carrefour Italia Mobile
Coop Voce
H3G Italia
Poste Mobile
Telecom Italia
Vodafone Omnitel
Wind Telecomunicazioni

Latvia
Bite Latvia
Latvijas Mobilais Telefons
Tele2

Lithuania
Bitė Lietuva
Omnitel
Tele2

Malta
Baytel Ltd.
Mobisle Communications Ltd (GO Mobile)
Redtouch Fone Ltd
Vodafone Malta Ltd

Netherlands
AH Mobiel
Debitel Nederland B.V.
KPN B.V.
Ortel Mobile B.V.
Qick - MRGQ B.V.
Rabo Mobiel B.V.
Tele2 Netherlands B.V.
T-Mobile Netherlands B.V.
UPC Nederland Mobile B.V.
Vodafone Libertel B.V.

Norway
ACN
Chess
Hello
Lebara
NetCom
Network Norway
Tele2
Telenor Mobil
Telio
Trigcom
Ventelo
Vitel

Poland
P4 Sp. z.o.o.
Polkomtel S.A.
PTC Sp. z.o.o.
PTK Centertel Sp. z.o.o.

Portugal
CTT – Correios de Portugal, S.A
Sonaecom - Serviços de Comunicações, SA
TMN - Telecomunicações Móveis Nacionais, SA
Vodafone Portugal - Comunicações Pessoais, SA
ZON TV Cabo Portugal, S.A.

Romania
Cosmote RMT
Orange Romania
Vodafone Romania

Slovak Republic
Telefónica O2 Slovakia
Orange Slovensko
T-Mobile Slovensko

Slovenia
Debitel d.d.
IZI mobil d.d.
Mobitel d.d.
i.mobil d.d.
T-2 d.o.o.
Tušmobil d.o.o.

Spain
Euskaltel
Orange
Telefónica Móviles de España
Vodafone
Yoigo

Sweden
Hi3G Access AB
Tele2 Sverige AB
Telenor Sverige AB
TeliaSonera AB
Ventelo Sverige AB

Switzerland
Orange Communications AG
Sunrise Communications AG
Swisscom (Schweiz) AG

United Kingdom
3 UK
O2 UK
Orange UK
T-Mobile UK
Vodafone UK
Virgin Mobile