



# **Strategic priorities in 2022**

**November 2021**

## I. INTRODUCTION

The Regulatory Agency for Electronic Communications and Postal Services (hereinafter: the Agency) was founded pursuant to the Law on Electronic Communications („Official Gazette of RS“, Nos. 44/10, 60/13-CC Decision 62/14 and 95/18 - other law, hereinafter: the Law) as an independent regulatory body, endowed with quality of legal person, performing public authorities for the purpose of implementing established policies in the field of electronic communications, fostering competition in the domain of electronic networks and services, improving their capacities and quality, contributing to the development of electronic communications market and protecting the interest of electronic communications' users, in accordance with the provisions of this Law and bylaws based thereon, and performing regulatory and other activities pursuant to a separate law regulating the domain of postal services.

The Managing Board of the Agency, pursuant to Article 11, paragraph 1, item 1 of the Law, adopts annual work plan of the Agency, which is harmonized with strategic acts and action plans in the domain of electronic communications and postal services, at the latest until December 15 of the current year, for each following year.

Based on the objectives of the Strategy for the development of next generation networks until 2023 („Official Gazette of RS“ No. 33/18), the Strategy for the development of postal services in the Republic of Serbia 2021-2025 („Official Gazette of RS“ No. 68/21), the Consumer protection strategy 2019-2024 („Official Gazette of RS“ No. 93/19) and the Strategy for the development of information society and cyber security in the Republic of Serbia 2021-2026 („Official Gazette of RS“ No. 86/21), the Agency prepared its 2022 Work Plan, which includes activities related to the development of an independent and consequent regulatory practice, for the purpose of supporting further electronic communications and postal markets development, fostering the competition, deploying new technologies and protecting end users.

Since new laws regulating the domains of electronic communications and postal services were adopted in 2019, and a new law on electronic communications is expected to be adopted, the Agency's principal activities will be focused on the implementation of new legal solutions, i.e. on drafting the relevant bylaws. The adoption of new laws will lead to a greater level of harmonization of the national regulations with the current EU regulatory framework. The Agency will also closely follow the adoption of the European Electronic Communications Code (EECC), along with its proposed solutions, so as to keep up with modern trends in the electronic communications market regulation.

In accordance with its competencies and current trends in the development in the fields of telecommunications, postal services and information security, but also having in mind the needs of operators and end users, **RATEL has defined nine strategic priorities for 2022.**

## **1. ENHANCEMENT OF ELECTRONIC COMMUNICATIONS REGULATORY FRAMEWORK AND UNIVERSAL SERVICE DEVELOPMENT**

With the finalization of the Draft Law on Electronic Communications underway and the prospect for the National Assembly to adopt the Law on Electronic Communications by the end of 2021, the enhancement of the regulatory frame based on the new legislation is the most important strategic priority of the Agency for 2022. The new Law on Electronic Communications will be harmonized with the EU electronic communications regulatory frame of 2018, enabling the adjustment of the legislation of the Republic of Serbia to the Acquis Communautaire and related improvements, namely innovative solutions compared to those contained in the present law, for the purpose of establishing an up to date, efficient and single regulatory frame governing further development of the electronic communications, thus fostering more competition, encouraging domestic and foreign investments, introducing more quality services and improving both business conditions for electronic communications operators and the protection of users' rights. The Agency is bound to undertake a set of regulatory activities to adopt the necessary bylaws in compliance with the new law and to implement the new regulations. A detailed activity plan regarding the adoption of bylaws based on the Law on Electronic Communications, within the prescribed deadlines, can only be prepared after the adoption of the Law. The final and transitory provisions of the currently available Draft Law on Electronic Communications foresee an eighteen-month deadline from the day of coming into force of the Law on Electronic Communications for the adoption of the bylaws.

The adoption of the new law governing the field of electronic communications and the Strategy for the development of universal service will determine the preparation of the bylaws defining more closely the collection of data and analysis of the universal service availability in the Republic of Serbia, requirements of equal access to universal service and the use thereof, as well as the level of detailed description and the manner of publishing the information about universal service offers by the operator, as part of their obligations.

**Activity 1 Implementation of the new Law on Electronic Communications by drafting new bylaws and harmonizing the acts with the EU electronic communications regulatory framework, and/or by amending the bylaws adopted pursuant to the law governing the electronic communications, if necessary.**

The drafting of bylaws and harmonization thereof will last throughout the year, in accordance with the provisions of the new law, and if the new law is not passed, the bylaws will be amended as necessary. The preparation and adoption of the bylaws are planned to be carried out in several phases. Before being forwarded for enactment, each draft shall be subject to the process of public consultations, as well as that of acquiring the opinion of the administrative body responsible for tasks regarding the implementation of the regulatory reform and analysis of the regulatory effects in line with the provisions of Article 10 of the Law on the Register of Administrative Procedures ("Official Gazette of RS", No. 44/21), when required under the law.

*Phase 1 – elaboration of Draft Radio Frequency Band Allocation Plan based on the Law on Electronic Communications.*

Changes and amendments to the Radio Frequency Band Allocation Plan are being prepared, based on the Law on Electronic Communications and an updated European Table of Frequency Allocations and Applications (ECA Table).

The Draft Law on Electronic Communications contains provisions related to the Radio Frequency Band Allocation Plan, calling for the latter to be changed. The main change will be an additional column in the Table of radio frequency bands, dedicated for the data regarding the transfer of rights. Further amendments for the purpose of harmonization with the European Table of Frequency Allocations and Applications (ECA Table) will be necessary as well.

*Phase 2 – adoption of bylaws governing: the draft radio frequency allotment plan in the radio frequency band 2100 MHz, fees for the provision of services from the Agency's scope of competence, number portability for services provided via public mobile communication networks, obligations of providers of value-added services, general terms and conditions for performing electronic communication activities under general authorization regime, manner of the use of radio frequencies under general authorization regime, manner and terms of use of radio frequencies and the procedure for individual license issuance for the use of radio frequencies.*

*Phase 3 – adoption of bylaws governing: the numbering plan, application form for the issuance of license for the use of numbering, quality parameters of publicly available electronic communication services, measurement, analysis and verification of electronic communications operators' procedures, manner of collection and publication of data on the type, availability and geographic location of the electronic communication network capacities, terms and conditions of access and use of data from a public directory, universal service.*

*Phase 4 – adoption of bylaws governing: number portability on public telephone networks at a fixed location, manner and conditions for assignment and usage of numbers from numeric range starting with number 116, content and manner of notification of international interconnection agreements.*

*Phase 5 – adoption of bylaws governing: the manner of recording overhead costs and the eligibility criteria for the right to cost recovery for additional costs related to universal service provision and the level of detail and manner of publishing the information on universal service provision offered by operators.*

*Phase 6 – adoption of bylaws governing the manner of amateur radio station usage.*

*Phase 7 – adoption of bylaws governing: the manner of radio frequency spectrum monitoring, technical inspection and protection from harmful interference.*

*Phase 8 – adoption of bylaws enabling changes and amendments to other rulebooks and harmonization with the new law governing electronic communications; adoption of new bylaws*

*after the coming into force of this law; preparation of draft bylaws passed by the line ministry on the Agency's proposal, governing, among other, the manner of radio stations usage on national and foreign aircrafts, locomotives, ships and other vessels and technical provisions regulating the market placement and/or usage of radio equipment, as well as the verification of the status for T-DAB and DVB-T Allotment Plans, already submitted to the line ministry.*

### **Activity 2 Preparing the initiative for the amendments to the Law on Fees for the Usage of Public Goods**

The amendment concerns Appendix 16 of the Law on Fees for the Usage of Public Goods (Official Gazette of RS, Nos. 95/18, 49/19, 86/19 – other regulation, 156/20 – other regulation and 15/21 – other regulation), in particular the manner of setting the fees for the use of numbering resources (access codes) to establish communication within functional networks and the fees for the usage of GSM-R system radio frequencies. With the adoption of the new Allocation Plan, the way some of the radio frequencies are used has been changed, in particular, new radio communication systems have been introduced in some frequency bands and, consequently, the manner of setting the fees for radio frequency usage needs to be updated.

### **Activity 3 Introducing expert supervision of the work of electronic communications operators and supervision of radio equipment**

In order to enhance the conditions for promoting competition and market liberalization, the Agency constantly monitors the work of electronic communications operators in terms of the results achieved, innovations made in the electronic communications area, availability and introduction of new technologies and complaints of end users and, accordingly, prepares reports for the annual market overview, performs analysis on the work of each operator and points to the identified shortcomings in the meetings with the operators or in cooperation with inspection services of the ministries in charge.

The new Law on Electronic Communications introduces a new authority of the Agency, involving expert supervision of the work of electronic communications operators and supervision of the radio equipment. The above powers will largely contribute to a more efficient work of the Agency in setting better conditions in the electronic communications and services market, thereby ensuring a more active role of the Agency in the implementation of the regulatory framework. This will also enable a better control over the compliance of technical requirements for the electronic communications equipment and radio equipment, including the equipment placed on the market and the usage of radio equipment, through cooperation with the responsible inspection authority and expert and technical assistance provided by the Agency. Finally, this will contribute to a more efficient prevention and removal of harmful interference.

Once the proposal is adopted and the new Law on Electronic Communications passed, necessary bylaws will be prepared and the work of employees who are to perform expert supervision of the

work of electronic communications operators and the supervision of radio equipment will be organized.

#### **Activity 4 Launching of a public call for operators interested to provide universal service under prescribed conditions**

The adoption of the new Law on Electronic Communications and elaboration of the Strategy for the development of universal service will determine the preparation of bylaws defining more closely the collection of data and analysis of the universal service availability in the Republic of Serbia, the requirements regarding the provision of equal possibilities for access and use of universal services, the level of detailed description and the manner of publishing the information about universal service offers by the operator. For the purpose of designating an universal service provider, the Agency will launch a public call for operators interested in universal service provision under prescribed conditions. The Agency will additionally carry out an analysis of the universal service provision in terms of volume, geographic coverage and quality of service, as well as the setting and monitoring of the level of detailed description and the manner of publishing the information about universal service offers made by the operator, as part of their obligation of making those data publicly available.

## **2. 5G NETWORK ROADMAP**

One of the main activities is the preparation for the launch of an auction for the issuance of individual licenses for the use of radio frequencies in the radio frequency bands intended for 5G technology. In the first semester of 2022, the Rulebook on minimum requirements for the issuance of individual licenses based on a public bidding is expected to be passed, followed by the start of the auction carried out by the Agency.

One of the priorities set by the European Union is a coordinated use of 5G technology in all EU member states by the end of 2020. The interest of the Republic of Serbia is therefore not to lag behind, but to take an active part in this process. For that reason, it is one of the Agency's priorities to perform all necessary preparatory work so as to ensure that proper conditions are met for the launch of the 5G RF spectrum auction in 2022.

#### **Activity 1 Preparation and carrying out of public bidding procedure for the issuance of individual licenses for the use of radio frequencies in radio frequency bands intended for 5G technology**

In accordance with the Study on the optimal RF spectrum auction model for the existing technologies and future 5G technology, carried out in 2019, the choice of consultants for the auction procedure will be made according to the model suggested. The consultant shall prepare all necessary procedures linked to the public bidding process, define the public bidding rules based on the type of public bidding, develop a software if the auction is to be carried out electronically, adapt the electronic auction software to our specific features and rules that are to be prescribed. The consultant shall also conduct all necessary training for the use of all needed software by the

qualified bidders (operators) and for the employees of the Agency, providing the support during the public bidding procedure and support after the decision on the best bids and bidders, should the matter be brought before court.

### **Activity 2 Defining of a new radio frequency band, suitable for migration of fixed links from frequency band 26 GHz identified as pioneer high-frequency band for 5G deployment**

In 2021 started a communication with the 26 GHz frequency band users, in relation to their plans to use the 26 GHz frequency band for 5G. Since the current users stated that they would not start to use this frequency band for 5G before 2026, an analysis of the 26 GHz frequency band occupancy, which is used for fixed links, will be carried out in 2022, when a new frequency band will be proposed for the migration of fixed links, whereupon the migration process will begin.

### **3. ENHANCEMENT OF RADIO FREQUENCY SPECTRUM MONITORING SYSTEM**

The construction of a new Monitoring and Measurement Center (MMC) Belgrade at the current location in Dobanovci is a necessary prerequisite for an efficient use of the RF spectrum monitoring system and creation of an optimal working environment for the employees. The existing complex, built in the 1960s, is unfit for use and in a bad condition due to decrepitude. The plan is however to keep it functional until the new complex is put in operation, following which the former will be demolished. The new complex will include a monitoring and measurement center building, antenna masts and auxiliary and accompanying facilities.

The construction project of remotely controlled monitoring and measurement station system (RCMMS) is in its final phase, which enables continuous spectrum monitoring of the major part of the national territory. A significant improvement of the existing RF spectrum monitoring system would include installation of a number of compact remotely controlled measuring stations (CRCMS) that would be mounted in cities and larger settlements. This would enable precise source identification in those cities and their immediate vicinity, using TDOA or hybrid TDOA/DF method, as well as monitoring of the activity of transmitters that broadcast signals with small output power but operate on higher frequencies, the presence of which is characteristic for urban areas. Networking of the stations of both types to form an integrated RF spectrum monitoring system allowing for access to different measuring equipment devices using a common software platform will create an environment for a more efficient monitoring of the radio frequency usage.

### **Activity 1 Elaboration of investment and technical documentation and acquisition of licenses and approvals from competent authorities; Preparatory activities for execution of construction works related to new Monitoring and Measurement Center “Belgrade” complex**

The elaboration of technical documentation includes providing complete project documentation regarding the complex (architectural project, construction project, interior design project including furniture arrangement in the premises), elaboration of technical documentation related to exterior space design, infrastructure and location landscaping, as well as technical documentation for two antenna masts.

Once the technical documentation is ready, necessary licenses and approvals from competent authorities will be acquired. The plan is to begin with preparatory work regarding the complex construction near the end of 2022.

### **Activity 2 Expansion of remotely controlled monitoring and measuring station network within RF spectrum monitoring system**

Activities related to the construction of fixed remotely controlled monitoring and measuring stations that will enable continuous radio frequency spectrum monitoring on the entire territory of the Republic of Serbia, will continue in 2022 as well.

In the first half of 2021, two fixed remotely controlled monitoring and measuring stations were put in operation, with installation of one remotely controlled monitoring and measuring station in the Monitoring and Measurement Center (MMC) Niš coverage area planned for the end of the year. This will complete the RF spectrum monitoring system of nineteen stations and two monitoring and measurement centers by the end of 2021. In addition, there are another three fixed remotely controlled monitoring and measuring stations in various project and infrastructural phases. The dynamics of installation and putting into operation of these stations are following the dynamics of the final phases of work.

### **Activity 3 Measuring equipment and vehicles**

The acquisition of an all-terrain monitoring and measurement vehicle intended for the Monitoring and Measurement Center (MMC) in the Belgrade area, with accompanying equipment and portable measuring equipment, is planned for 2022. The purchase of certain spare parts and components necessary for the functioning of the compact remotely controlled measuring stations is planned as well, ensuring the redundancy and reliability of the system vital parts' operation.

### **Activity 4 Pilot project for RF spectrum monitoring system in urban areas**

In 2021, a pilot project of construction and installation of three compact remotely controlled measuring stations (CRCMS) in the area of Novi Sad was started. The stations will be equipped with a TDOA RF signal source geolocation feature and will be integrated in the existing MMC Belgrade monitoring system. The CRCMS measuring equipment will be delivered before the end of 2021, while the installation of the first three RF spectrum monitoring system stations in urban areas is planned for the first semester of 2022.

### **Activity 5 Expansion of compact remotely controlled measuring station network within RF spectrum monitoring system in urban areas**

In 2022, the acquisition of measurement equipment and construction of compact remotely controlled measuring stations (CRCMS) will be continued in cities covered by both MMCs. This will be carried out in accordance with the Pilot project and guidelines from the Feasibility study on the roll out of the system for continuous RF spectrum monitoring in urban areas, elaborated by the Faculty of Electrical Engineering of the Belgrade University in cooperation with the Innovation Center of the Faculty.



#### **4. PROTECTION OF ELECTRONIC COMMUNICATIONS AND POSTAL SERVICES USERS**

One of the postulates upon which market regulation rests is the provision of a high-level protection of consumers' interests in their relations with operators. This is particularly reflected in making available clear and complete information on prices, access and usage to the customers, as well as in the efficient handling of complaints related to the work of operators. Constant efforts in improving the availability, accessibility and quality of public communications networks and services and postal services for all users remains to be the Agency's priority in 2022.

##### **Activity 1 More efficient dispute resolution**

During the implementation of the Law on Electronic Communications („Official Gazette of RS“, Nos. 44/10, 60/13 – CC Decision, 62/14 and 95/18 – other law), it was noticed that most complaints about the work of operators were related to the received bill for provided services. Pursuant to Article 113 of the Law, the Agency carries out the procedure of mediation in a peaceful dispute resolution between the subscribers/users and electronic communications operators regarding the bill and/or quality of services. Once the new Law on Electronic Communications comes into force, the Agency will be authorized to resolve disputes between operators and subscribers in an out-of-court procedure, by means of a decision “on the merits”, in the best interest of both parties. This solution is already applied in the region and it has been applied in the EU countries for years. In addition, the Agency analyses the electronic communications operators' General Terms and Conditions, for the purpose of giving orders, recommendations and suggestions on how to make changes and amendments to these Terms and Conditions and to harmonize them with regulations governing the domain of electronic communications and consumer protection as well as with other acts, all with the aim of providing a more efficient protection of electronic communications users. In exercising the authority related to the consumer protection, the Agency cooperates with other bodies and organizations, such as the line ministry, inspection services of the line ministry, authorities of the autonomous province in charge of inspection, the Regulatory Authority for Electronic Media and other relevant bodies.

In 2022, the Agency will continue to monitor the application of the regulations governing the area of electronic communications users' protection, as well as the relevant regulations. The Guidelines for telecommunication service users' protection – Information and education of electronic communications users/subscribers, available on the Agency's website, assist and educate the users by means of advice, instructions and guidance in order to minimize and avoid potential complaints. Additionally, the coming into force of the Law on Electronic Communications will provide harmonization of the above guidelines with new legal solutions pertaining to the protection of electronic communications users.

## **Activity 2 Monitoring of regulated roaming charges in the Western Balkans region**

The Agency will continue to monitor regulated roaming charges and the application of the Agreement on the price reduction of the roaming services in the Western Balkans region, establishing a new roaming rule, the so-called *roam like at home* principle, which eliminates roaming charges for end users.

## **Activity 3 Taking actions to create conditions for reduction of roaming charges between the Western Balkans region and the European Union**

In line with the Western Balkans Region Declaration on Common Regional Market signed on 10 November 2020 during the Summit held in Sofia, as part of further arrangements made between the representatives of the European Union and the Western Balkans region, the Agency will take necessary action to create conditions for the reduction of roaming charges between the Western Balkans region and the European Union.

## **Activity 4 Cooperation with stakeholders involved in postal market competition protection**

In accordance with the Strategy for the development of postal services 2021-2025, the Agency has a national obligation to coordinate activities in order to efficiently protect and encourage postal market competition. Our plan is to carry out a number of activities in 2022 related to regular meetings and discussions with other interested parties such as: the line ministry, Serbian Chamber of Commerce (association of post express and other postal services) and Commission for Protection of Competition.

## **Activity 5 Mediation in out-of-court dispute resolution between users and postal operators**

Pursuant to the Law on Postal Services (“Official Gazette of RS“, No. 77/19), the Agency mediates in an out-of-court dispute resolution process between users and postal operators, by applying legal provisions pertaining to mediation and arbitration, as well as other regulations governing the matter of out-of-court dispute resolution. In order to improve the efficacy of the above activities, the Agency will, in an internal act, regulate more closely the mediation procedure in an out-of-court dispute resolution between the postal service users (complainants) and postal operators, in line with the suggestions received from PLAC experts, in a continuation of the PLAC 3 project.

## **5. ENHANCEMENT OF COMPETITION IN ELECTRONIC COMMUNICATIONS AND POSTAL MARKETS**

One of the primary activities of the Agency, pursuant to the regulations governing the areas of electronic communications and postal services is to enhance competition in the electronic communications and postal markets. The main mechanism available to every regulator are market analyses and the Agency will continue with its activities in this area. Also, mobile network quality parameters benchmarking campaigns will be continued. In 2022, in addition to the measurement of quality of service of the PPO’s universal postal service, the measurement of quality of service of express services provided by other postal operators will begin as well.

### **Activity 1 Finalization of all activities related to new circle of relevant markets analysis**

In 2021 and 2022, a new circle of market analyses will be over, in accordance with the Commission Recommendation on relevant product and service markets (2014/710/EU) and the Decision on the establishment of relevant markets susceptible to ex-ante regulation („Official Gazette of RS“, No. 78/18), based on which the following markets are declared susceptible to ex-ante regulation:

1. Wholesale call termination on individual public telephone networks provided at a fixed location;
2. Wholesale voice call termination on individual mobile networks;
3.
  - (a) Wholesale local access provided at a fixed location;
  - (b) Wholesale central access provided at a fixed location for mass-market products.

Based on the market analyses, appropriate decisions on the designation of the operator with significant market power in each relevant market will be reached.

### **Activity 2 Implementation of Long Run Incremental Cost (LRIC) model**

The adoption of the Rulebook amending the Rulebook on the application of the cost-accounting principle, separate accounts and reporting by an operator with significant market power in the electronic communications sector („Official Gazette of RS“, No. 53/21) has enabled the application of a new cost-accounting model based on Bottom–up Long Run Incremental Costs (LRIC) in the fixed and mobile networks cost-allocation accounting, with the aim of harmonization with the EC Recommendation of May 7, 2009 on the regulation of fixed and mobile call termination in the EU (2009/396/EC) and the EC Recommendation of September 11, 2013, on consistent non-discrimination obligations and costing methodologies to promote competition and enhance the broadband investment environment (2013/466/EU), whereby the BU LRIC+ methodology represents a recommended tool for determination of the regulated wholesale access service prices. Operators with significant market power that have been assigned the obligation of cost-accounting separation and cost-allocation accounting shall continue to submit their regulatory reports according to the current cost model.

### **Activity 3 Price control of regulated services and bundled services**

The majority of EU countries and countries in the region have a developed methodology for identification of margin squeeze prices which is consequently implemented on bundled service prices. Since the share of retail bundled services offered by the operators is increasing, the control of bundled service prices represents a continuous task for the Agency in future.

### **Activity 4 Verification of reference offers of operators with significant market power (SMP)**

As part of the monitoring of SMP operators' obligations, the Agency performs verification of the compliance of SMP operators' reference offers with the Rulebook on minimum content, level of detail and manner of publishing standard offers. The operators with SMP, as decided by the

Agency, are obliged to publish selected data and practice non-discriminatory behaviour on the relevant market while providing services.

#### **Activity 5 Benchmarking and analysis of quality parameters of other postal operators' services**

This activity has been defined in the Strategy for the development of postal services in the Republic of Serbia 2021-2025, with the Agency being charged with the execution thereof. The focus of this activity is a new model of postal service quality measurement outside the scope of universal postal service. The model includes: creation and design of a quality parameter setup in cooperation with relevant national and international institutions, carrying out of a public procurement of an independent measurement and result presentation. The model will also be used for the needs of expert supervision.

#### **Activity 6 Applications for comparison of prices of postal operators providing other postal services**

In 2022, the launching of an application for comparison of prices of postal operators providing other postal services in national traffic is planned. The purpose of this activity is to make it possible for the users to compare the prices of express and courier services (from the scope of other postal services) provided by postal operators in national traffic.

#### **Activity 7 Informing users about availability of other postal services provided by operators via Agency's GIS portal**

The Strategy for the development of postal services in the Republic of Serbia 2021-2025 foresees the implementation of a GIS (geographic information system) portal, with the aim of displaying territorial availability of the postal operators' services (post offices, parcel lockers, territorial service coverage and other), spatial data search, as well as other data enabling the users to view, in a simple way, the quality of postal operators' service availability.

### **6. ANALYSIS OF PPO's ACTIVITIES IN TERMS OF QUALITY, COSTS AND UPS SUSTAINABILITY**

Fast changes on the postal services market regarding shifts in users' needs have resulted in decreased volumes of letter-post items and increased parcel volumes, putting the UPS financial sustainability under pressure, since the income growth from parcels does not surpass the negative letter-post income growth with the majority of universal service providers across Europe. With that in mind, it is of utmost importance for the PPO to apply correctly the cost accounting methodology for UPS in 2022, in order to enable price corrections and perform a UPS sustainability study. Monitoring of quality of service will be the Agency's priority in 2022, particularly in view of an unsatisfactory level of the postal service provision quality over the previous year.

### **Activity 1 Analysis of quality of universal service provision by PPO and service provision costs audit**

In order to provide access, prescribed quality and affordability of the universal postal service to all citizens of the Republic of Serbia, the Agency in 2022 will be monitoring and analyzing the quality of UPS provided by the PPO, as well as auditing the costs of this service, pursuant to the Rulebook on the manner of accounting separation application and reliability review of public postal operator's regulatory reports ("Official Gazette of RS", No. 126/20). Based on the above analyses and the users' needs, an analysis of the UPS sustainability will be carried out, which could subsequently entail possible changes to the bylaws and regulations.

### **Activity 2 Analysis of UPS sustainability**

Taking into account the evident drop in the volume of UPS and increase of costs per service unit on one hand, and basic postulates such as affordable prices and guaranteed (usually high) quality on the other, the question of sustainability gains more importance than ever before. Additionally, recent changes in the users' needs should also be taken into account when performing the analysis of sustainability. The Strategy for the development of postal services in the Republic of Serbia 2021-2025 has identified this activity as crucial and designed the Agency as a lead institution responsible for the execution thereof.

## **7. DEVELOPMENT OF SYSTEM FOR COORDINATION AND RISK PREVENTION IN ICT SYSTEMS**

Pursuant to the amended Law on Information Security and adopted bylaws, the activities from the scope of competence of the National CERT will be carried out according to the prescribed schedule.

### **Activity 1 Campaigns and promotion of information security**

Promotion of information security will be carried out by producing video and printed materials and by making reports on incidents reported by operators, generated reports for operators, by implementing cyber threat detection system, by holding seminars, workshops and lectures with the purpose of raising awareness on cyber security.

The Strategy for the development of information society and information security 2021-2026 and the accompanying Action Plan foresee that the National CERT will provide a platform for raising citizens' awareness and knowledge on the matter of cyber security. In accordance with this Strategy requirement and as a means of enhancement in this area, the acquisition of this platform is planned. The platform is intended for all types of users and its content is to be adapted to different levels of users' knowledge.

### **Activity 2 Taking part in cyber security trainings**

The Cyber Security Division will participate in the work of conferences, attend courses and seminars, aiming for constant professional improvement in the area of information security.

### **Activity 3 Cooperation with domestic, regional and international organizations dealing with cyber security**

The National CERT cooperates directly with the national authority in charge of the ICT system security, special CERTs in the Republic of Serbia and similar organizations in other countries, public and business entities, CERTs of independent ICT system operators and the republic bodies' CERT. The National CERT will continue to enhance the existing cooperation with international organizations in the field of cyber security by actively participating in conferences and regional and international projects, including collaboration with other members of the national CERT community on the territory of the Republic of Serbia.

### **Activity 4 Implementation of cyber threat detection system**

A cyber threat detection system will enable assessment and monitoring of the information security situation in the Republic of Serbia, which will provide the grounds for planning and implementing proactive and reactive measures, with the purpose of enhancing defence capacities in the cyber security area. The implementation of this system on the territory of the Republic of Serbia will be carried out gradually, within the possibilities of the system itself.

### **Activity 5 Implementation of *CyberRange* cyber attack simulation system**

At the end of 2020, the installation of a cyber attack simulation system was finished, as part of a donation agreement and project Norway for You – Serbia. The cyber attack simulation platform is intended for the strengthening of the staff capacities of the Department of information security and technologies, as well as those in the relevant national institutions. The platform offers 23 real scenarios and a feature to simulate the working environment of the employees tasked with cyber security activities. The attendees at the training sessions acquire knowledge and skills necessary for the detection of and recovery from cyber attacks.

## **8. ENHANCED INTERNATIONAL PRESENCE AND IMPROVED NATIONAL VISIBILITY OF THE AGENCY**

The Agency will continue to participate in the work of international organizations and institutions in the field of electronic communications, postal services and information security. In addition, further cooperation with regulatory and expert bodies of the neighbouring countries, the EU member states and other countries is planned, in the aim of harmonizing practices and implementing regulations. A particular focus will be placed on the stronger presence in the work of the organizations gathering the European regulators for electronic communications and postal services, as well as on the cooperation with the NRAs of the neighbouring countries.

**Activity 1 Participation in working groups of the International Telecommunication Union (ITU), European Conference of Postal and Telecommunications Administrations (CEPT), European Institute for Standardization of Information and Communication Technologies (ETSI), Radio Spectrum Policy Group (RSPG), Body of European Regulators for Electronic Communications (BEREC), Independent Regulators Group (IRG), European Union Agency**

**for Cybersecurity (ENISA), European Committee for Postal Regulation (CERP) and European Regulators Group for Postal Services (ERGP)**

In 2022, the Agency will continue to participate in the work of international organizations and institutions in the field of electronic communications, in the work of standardization bodies and European conferences and it will keep up the cooperation with the regulatory and expert bodies of the EU member states and other countries, in order to harmonize practices and application of regulations in the field of electronic communications.

Through a continuous participation and involvement in the activities of the expert working groups of the International Telecommunication Union (ITU), European Institute for Standardization of Information and Communication Technologies (ETSI), Body of European Regulators for Electronic Communications (BEREC), Independent Regulators Group (IRG), European Union Agency for Cybersecurity (ENISA) and European Conference of Postal and Telecommunications Administrations (CEPT), the Agency's representatives will contribute to the preparation and drafting of documents, guidelines, strategies and development plans for the purpose of enhancing the electronic communications area. In cooperation with other interested countries, the Agency initiated and submitted a contribution to the ITU WP4A working group to amend the Appendix 30B regulation regarding the coordination and recording procedure pertaining to the FSS satellite network plan. The activities related to the submitted contribution continue and the proposition is expected to be accepted and adopted at the next World radiocommunication conference WRC-23.

In 2022, the Agency will take part in the work of the Radio Spectrum Policy Group (RSPG). RSPG is a high-level advisory group that assists the European Commission, through strategic advice, in the development of radio spectrum policy regarding the following areas: radio spectrum policy, coordination of policy approaches and harmonization of conditions necessary for the establishment and functioning of the internal market. Serbia has an observer status in RSPG and the advantages of Agency's participation in its work involve access to strategic documents, such as opinions, position papers and reports, enabling an efficient policy application specific to our conditions.

In 2022, the Agency will continue the cooperation with the EU member states, EFTA members and EU candidate countries within the Body of European Regulators for Electronic Communications (BEREC) and Independent Regulators Group (IRG), mainly through participation in CN meetings and WGs formed for different topics. The activities will focus mainly on the implementation of the new regulatory framework for electronic communications in the EU and its application within the national legislation.

The Agency participates in the work of international organizations and institutions in the field of postal services and cooperates with the regulatory and expert bodies of the EU member states and other countries in order to harmonize practices of postal regulators and implementation of postal service regulations.

Representatives of the Agency are continuously and actively involved in all working groups of the European Regulators Group for Postal Services (ERGP) and participate in the plenary meetings in

an observer status. The Agency's representatives will continue to follow the activities of ERGP and participate in the three of its WGs: Consumers and Market Indicators WG, Regulatory Framework WG and Regulatory tools WG, as well as in the ERGP CN meetings and ERGP Plenaries. A representative of the Agency is actively involved in the elaboration of an ERGP Market Indicators WG report, as part of the drafting team.

In line with the set priorities of the Republic of Serbia in the field of postal services, the Agency will follow the activities of the Universal Postal Union (UPU) and its Council of Administration (CA) in charge of the matters of postal regulation worldwide. These activities will be coordinated with the Ministry of Trade, Tourism and Telecommunications.

Necessary activities within a dedicated task group will be carried out in accordance with guidelines adopted at the 27th UPU Congress, related to the opening of the UPU to private operators. The signing of an agreement on technical cooperation between the UPU and CERP in the area of postal strategic planning and regulation is planned for 2022. As for the European regulation, further steps are expected to be made regarding the drafting, adoption and implementation of a new EU postal directive. The Agency's representative will continue with their activities as a Vice-Chair of the Committee.

### **Activity 2 Enhanced regional cooperation**

The Cooperation Forum of Regulatory Authorities for Electronic Communications of Bosnia and Herzegovina, Montenegro, North Macedonia and Serbia is planned to take place in November each year. Also, regular meetings between the experts from the four regulators on different topics will be intensified.

Further cooperation between the regulators of the signatories to the Agreement on reduction of roaming charges will take place in order to define the next steps in the regulation of roaming charges. Also, visits to the regulatory authorities in the region are planned in order to share experience from the regulatory practice.

The annual National CERT Conference is planned to be organized in October, the Cyber Security Month, and it will be dedicated to the promotion of the importance of cyber security.

### **Activity 3 Elaboration of strategy and communication plan**

Design and implementation of activities intended to increase the visibility of the Agency will continue, aiming to make the Agency's role and results closer to the general public, increase the visits to the website and further improve the interaction with the users and community.

The communication strategy and plan will be designed in 2022, clearly defining the goals of the Agency's presentation and setting the timeline for objectives, by developing a clear plan of monthly campaigns, animated videos, posters and films dedicated to selected topics to be presented in the digital media with the purpose of informing and advising the general public and promoting a positive public image of the Agency.



The Agency will do its best to boost its visibility on social media through enhanced visits to its website, comprehensive explanation of the scope of its work and actual projects, through different means of increasing its interaction with the citizens/users (by prolonged visits to the website, interactions on social networks, use of RATEL NetTest application, viewing of service price lists and similar).

The communication plan for 2022 foresees a further creation of animated video clips, films, brochures, photos, posters, short interviews and social network campaigns explaining the Agency's competencies.

#### **Activity 4 Increasing Agency's visibility across media**

With the aim to enhance the Agency's visibility and presence across the media, the following means of presentation are planned: interview in an international publication with the director of the Agency about market regulation and 5G technology in Serbia, media support to domestic and foreign meetings and coverage thereof, communication with citizens and companies about topics of interest in the fields of electronic communications and postal services via the user's information service, setting up of a more accessible and comprehensive website for business and private users and the media, and the creation of short films and video clips with educational and informational content.

### **9. E-DESK PROJECT IMPLEMENTATION**

Electronic Desk (e-Desk) is an information system which will be implemented in accordance with the Law on Electronic Government ("Official Gazette of RS", No. 27/18), as a means of communication among the public administration bodies.

Pursuant to the Decree on office management for state administration authorities ("Official Gazette of RS", Nos. 21/20 and 32/21), the work of the Agency's desk should be harmonized with the e-Desk activities. The Government Work Group is preparing a bylaw that will define in more detail the e-Desk project implementation, planned for April 2022.