



Document for Nkom

Data request for Telenor for model implementation

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1 Introduction

Analysys Mason has been commissioned to support Nkom on the adaptation and finalisation of the margin-squeeze tool that was previously developed in 2016, to ensure that it can continue to be used as a primary price-control tool for the regulation of wholesale mobile access prices in the market for access and call origination on mobile networks (Market 15 (2004) of the EFTA¹ Surveillance Authority, or ESA).

1.1 Purpose of this document

This document is a data request for implementation of the aforementioned margin-squeeze tool and is directed to Telenor. The model has been updated from its original version of June 2016, following interactions with Telenor.

The purpose of this document is to formalise the discussions that have been held between Telenor, Analysys Mason and Nkom regarding what kind of information and what level of granularity Telenor can provide for the purpose of this model.

1.2 Data provided by Telenor

The model will be based on monthly average data. The data must be provided in the format specified in the Excel template accompanying this document. Nkom requires submissions be made on 1 April and 1 October of each year, covering the previous six months. For example:

- the submissions of 1 April 2024 will be for the months of September 2023, October 2023, November 2023, December 2023, January 2024 and February 2024
- the submissions of 1 October 2024 will be for the months of March 2024, April 2024, May 2024, June 2024, July 2024 and August 2024.

Please provide all cost/revenue information in nominal Norwegian kroner (NOK), excluding VAT.

1.3 Treatment of confidential information

Data provided by Telenor is of the utmost importance for the implementation of the model and the requested data must be sent to Nkom. The objective of the model is to be transparent and shareable for all industry parties. However, we recognise that the model must take into account confidentiality considerations and therefore some data will not be released in public models.

Within its response, Telenor should indicate to Nkom the specific areas of qualitative and quantitative confidentiality.

¹ European Free Trade Association.

2 Inputs on an offer-by-offer basis

All of the items in this section should be provided on an offer-by-offer basis (for all of the products that Nkom has selected to be tested) based on either direct extractions from Telenor's data warehouses or allocations conducted by Telenor.

2.1 Demand

The following demand data is requested for each of the products that Nkom has selected to be tested. Data should be provided separately for each of the six months in the relevant period.

Figure 2.1: Demand data requested from Telenor [Source: Analysys Mason, 2024]

| Category | Label in data submission | Comments |
|---------------|---|--|
| Subscriptions | Month-average subscribers | Average of month-beginning and month-end subscribers |
| Voice | Voice minutes originated abroad inside the EEA | This should exclude call forwarding while roaming inside the European Economic Area (EEA) |
| Voice | Voice minutes originated abroad outside the EEA | This should exclude call forwarding while roaming outside the EEA |
| Voice | Call forwarding while roaming for calls originated abroad inside the EEA | |
| Voice | Call forwarding while roaming for calls originated abroad outside the EEA | |
| Voice | Call forwarding while roaming for calls originated abroad inside the EEA | |
| Voice | Call forwarding while roaming for calls originated abroad outside the EEA | |
| Voice | Originated VAS minutes | Value added service (VAS) minutes should include calls to: <ul style="list-style-type: none"> • special 18xx numbers • special 3- and 5-digit numbers • special 8xx numbers |
| Voice | Voice minutes originated in Norway to international destinations | |
| Voice | Voice minutes originated in Norway to domestic on-net mobile | |
| Voice | Voice minutes originated in Norway to domestic off-net mobile | |
| Voice | Voice minutes originated in Norway to domestic fixed | This should include calls to: <ul style="list-style-type: none"> • 8-digit geographical fixed destinations • any other fixed destinations |
| Voice | Voice minutes terminated from other networks | |

| Category | Label in data submission | Comments |
|----------|---|---|
| Messages | Messages originated abroad inside the EEA | |
| Messages | Messages originated abroad outside the EEA | |
| Messages | BankID messages | |
| Messages | Other VAS messages | |
| Messages | Messages originated in Norway to international destinations | |
| Messages | Messages originated in Norway to domestic destinations | |
| Messages | Messages terminated from other networks | |
| Data | Data megabytes originated abroad inside the EEA | Ensure that all megabytes consumed are included (e.g. include zero-rated traffic) |
| Data | Data megabytes originated abroad outside the EEA | Ensure that all megabytes consumed are included (e.g. include zero-rated traffic) |
| Data | Data megabytes originated in Norway | <ul style="list-style-type: none"> • Ensure that <u>all</u> megabytes consumed are included (e.g. include zero-rated traffic) • Please split by Telenor's usage tier • Please do not specify more than 12 different tiers in total |

2.2 Revenue

The following revenue data is requested for each of the products that Nkom has selected to be tested. Data should be provided separately for each of the six months in the relevant period.

Figure 2.2: Revenue data requested from Telenor [Source: Analysys Mason, 2024]

| Category | Label in data submission | Comments |
|---------------|--------------------------|---|
| Subscriptions | Recurring | This should include monthly fees for the call plan, adjusted to be net of all discounts and credit notes, plus lock-in invoice reductions |
| Subscriptions | Lock-in | This should include any handset-related lock-in fees |
| Subscriptions | Breach in lock-in | This should include charges for breaches of lock-in |
| Subscriptions | Other fees | <p>This should include all other revenue relevant to the product, such as:</p> <ul style="list-style-type: none"> • connection fees related to either the plan or add-on services • fees for add-on services • invoicing/dunning charges |

| Category | Label in data submission | Comments |
|----------|---|--|
| Voice | Voice minutes originated abroad inside the EEA | This should exclude call forwarding while roaming |
| Voice | Voice minutes originated abroad outside the EEA | This should exclude call forwarding while roaming |
| Voice | Call forwarding while roaming for calls originated abroad inside the EEA | |
| Voice | Call forwarding while roaming for calls originated abroad outside the EEA | |
| Voice | Originated VAS minutes | This should include calls to: <ul style="list-style-type: none"> • special 18xx numbers • special 3- and 5-digit numbers • special 8xx numbers |
| Voice | Voice minutes originated in Norway to international destinations | |
| Voice | Voice minutes originated in Norway to domestic destinations | This should include calls to: <ul style="list-style-type: none"> • on-net mobile destinations • off-net mobile destinations • 8-digit geographical fixed destinations • other fixed destinations |
| Voice | Voice minutes terminated from other networks | |
| Messages | Messages originated abroad inside the EEA | |
| Messages | Messages originated abroad outside the EEA | |
| Messages | BankID messages | |
| Messages | Other VAS messages | |
| Messages | Messages originated in Norway to international destinations | |
| Messages | Messages originated in Norway to domestic destinations | This should include messages to both on-net and off-net mobile destinations |
| Messages | Messages terminated from other networks | |
| Data | Data megabytes originated abroad inside the EEA | |
| Data | Data megabytes originated abroad outside the EEA | |
| Data | Data megabytes originated in Norway | |

2.3 Tariffs

For each offer, please provide monthly tariffs (in NOK) for the nominal monthly fee of the base subscription. Please specify whether the tariffs provided for each segment include or exclude value-added tax (VAT). Please provide tariffs in effect as of the end of the relevant six-month period of the submission. Please also specify the speed option for each product (15Mbit/s, 150Mbit/s, 200Mbit/s or unlimited).

2.4 Accounting information

For the 1 October submission only, using the most recent financial year of separated accounts, please provide a further breakdown of each of the following accounting categories between your residential and business customer segments:

- Revenues attributable to mobile handsets
- Other revenues
- External costs attributable to mobile handsets
- Other external costs
- Sales: Commissions
- Sales: Other
- Marketing
- Customer service
- Management & Administration: IS
- Management & Administration: Other
- Invoicing
- Postage costs
- Project management
- Service platforms
- Depreciation
- Cost of capital.

Please provide values in NOK million.

Please exclude any costs from the segments associated with the following types of subscriptions:

- mobile broadband (MBB)-only
- machine-to-machine (M2M)
- Internet of Things (IoT).

3 Inputs at an aggregate level

3.1 Traffic

The following data is requested at an aggregate level, i.e. for the total Norwegian mobile business of Telenor, across the six calendar months in the relevant period.

Figure 3.1: Aggregated traffic information requested from Telenor [Source: Analysys Mason, 2024]

| Label in data submission | Comments |
|---------------------------------------|--|
| Voice minutes originated abroad | Please split each category according to: <ul style="list-style-type: none"> • European Union (EU)/EEA • Zone 1 • Zone 2 • Zone 3 • Other zones (please specify) |
| Call forwarding minutes while roaming | |
| Messages originated abroad | |
| Data megabytes originated abroad | |

3.2 Costs

The following data is also requested at an aggregate level, i.e. for the total Norwegian mobile business of Telenor, across the six calendar months in the relevant period.

Figure 3.2: Cost information requested from Telenor [Source: Analysys Mason, 2024]

| Category | Label in data submission | Definition/label |
|-----------------------|--|---|
| Interconnect | Domestic voice minutes to domestic fixed networks | Average cost per minute across all such minutes originated in Norway |
| Interconnect | Domestic voice minutes to off-net domestic mobile networks | Average cost per minute across all such minutes originated in Norway |
| Interconnect | Domestic voice minutes to international destinations | Average cost per minute across all such minutes originated in Norway |
| Interconnect | Domestic messages to off-net domestic mobile networks | Average cost per message across all such messages originated in Norway |
| Interconnect | Domestic messages to international destinations | Average cost per message across all such messages originated in Norway |
| Interconnect /content | Costs for calls to VAS | Average cost per minute across calls to special 8xx/18xx/3- and 5-digit numbers |
| Interconnect /content | Costs for messages to BankID | Average cost per message across all such BankID messages |
| Interconnect /content | Costs for messages to VAS | Average cost per message across all such messages to VAS numbers (excluding BankID) |
| International | Outgoing international voice | Average cost per minute if Telenor's international voice was billed based on the SP reference offer |
| VAS | VAS traffic | Average cost per minute if Telenor's VAS minutes had been billed based on the SP reference offer |

