



HRVATSKA
REGULATORNA AGENCIJA
ZA MREŽNE
DJELATNOSTI

2024 ANNUAL WORK PROGRAMME

ZAGREB 2023

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01

Introduction



INTRODUCTION

[The Croatian Regulatory Authority for Network Industries](#) (HAKOM) is the national regulatory authority for electronic communications markets as well as postal and rail services markets. HAKOM is an independent and autonomous legal entity with public authority, accountable for its work to the [Croatian Parliament](#). The 2024 Annual Work Programme defines all HAKOM's planned activities (goals) with measurable outcomes in relation to the time frame, the 2024 Financial Plan and strategic priorities determined by the [HAKOM's Strategy for the Period Between 2022 and 2025](#).

Most of the tasks and operations are performed within the scope of public authority pursuant to the acts whose implementation falls within HAKOM's competence. These primarily include the [Electronic Communications Act \(ECA\)](#), [Act on Measures to Reduce the Cost of Deploying High-speed Electronic Communications Networks](#), [Postal Services Act \(PSA\)](#), [Act on the Regulation of Rail Services Market and the Protection of Passenger Rights in Rail Transport \(ARRSM\)](#) and the [Railway Act \(RA\)](#). Pursuant to these acts, HAKOM adopts ordinances regulating in more detail technical issues related to their implementation, while also participating in the implementation of other regulations and subordinate legislation.

HAKOM's regulatory principles and goals, which form the basis for the planned activities; are defined by the regulatory frameworks of the European Union (EU) and the Republic of Croatia (HR) and enshrined in HAKOM's mission statement: "By encouraging regulatory predictability, preventing discrimination, ensuring the efficient management of limited goods, promoting effective investments, protecting market competition and contributing to the development of the EU's market, HAKOM regulates electronic communications markets as well as postal and rail services markets in the interest of service users." HAKOM's vision involves: "Developing sustainable network services markets that enable competition through a wide range of high-quality services accessible to all citizens."

In 2024, HAKOM will continue to develop as an agile organisation, ready to respond to challenges and quick changes, with its own organisational culture that focuses on team work, because the regulation of network services markets is highly interdisciplinary, involving a combination of technical, economic and legal expertise. Inspection powers ensure compliance with regulations or HAKOM's decisions and provide for a quick response when market irregularities are spotted. The high level of the protection of users (passengers), a strategic priority, is achieved by preventive and corrective actions and encompasses the resolution of disputes between users and service providers in all three network industries as well as the regular analysis of the complaint systems of various service providers.

HAKOM's regulatory decision-making processes were adjusted upon the completion of the project of introducing a systematic and methodology-based regulatory impact assessment. The regulatory impact assessment¹ (RIA) is conducted for all HAKOM's regulatory decisions with a significant impact, thus facilitating a more efficient market regulation focused on transparent and responsible decision-making.

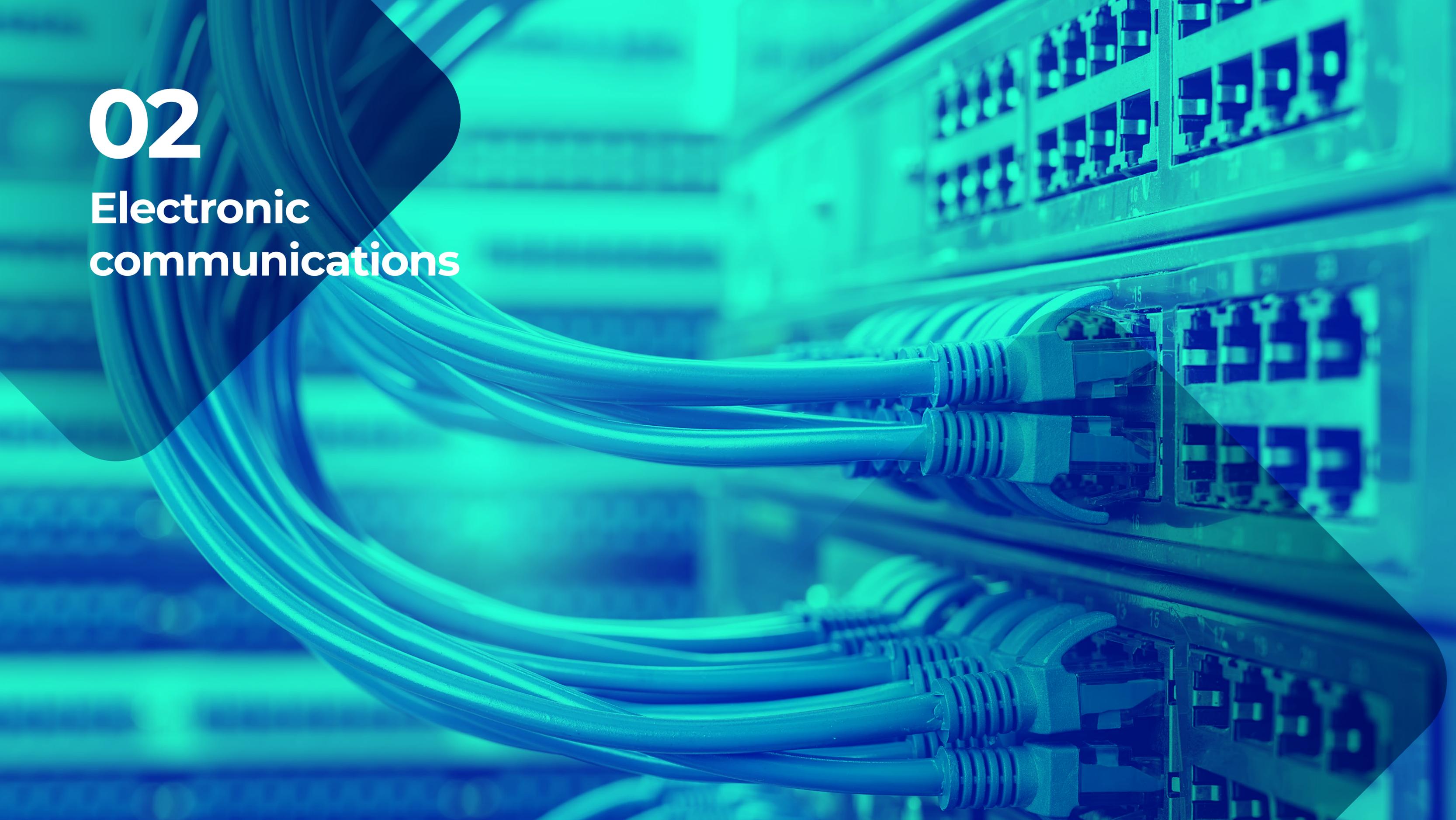
In 2024, a portion of the resources will be devoted to chairing the Body of European Regulators for Electronic Communications (BEREC), with the President of the Council of HAKOM having been elected BEREC Chair for 2024.

Aiming to constantly improve the quality of its services and achieve its strategic goals, HAKOM continues to implement good regulatory practices, focusing its efforts on the development of sustainable network services market to the benefit of all citizens of the HR.

1. In the tables, the activities in which a decision will be adopted following the impact assessment are marked with an asterisk (*) next to the ordinal number.

02

**Electronic
communications**



Electronic communications are the backbone of the digital ecosystem, which is today based on the internet and the broadband internet access via fixed and mobile electronic communications networks. Croatia keeps pace with the technological development and has already implemented modern fixed and mobile networks. The greatest challenge at the moment is finding the way to reduce the digital gap between urban and rural areas and promote the use and construction of modern VHCNs in the underpopulated areas of the HR. In order to speed up the process it is also necessary to facilitate the construction and installation of the electronic communications infrastructure and facilities and use the EU funds available for their construction.

HAKOM will focus on these objectives in 2024, while taking account of user protection as well as of network neutrality and internet openness in compliance with EU regulations. In addition to market supervision and dispute resolution, user protection activities will comprise user information and education, with a special emphasis on consumer groups necessitating special attention, such as the elderly, children and persons with disabilities.

Regulatory activities

The implementation of regulatory activities strongly relies on timely and accurate market data, which enable making prompt responses and adopting regulatory decisions that are data-informed and proportionate to identified market obstacles. Some of these data and indicators are used for reporting to other national and international institutions. HAKOM therefore regularly **collects data and indicators on market conditions** and publishes them on its website. Cooperation with operators is extremely important in this process. In 2023, in an effort to improve the performance of regulatory activities, HAKOM modified the questionnaires used to collect data on market conditions, adjusting them to market changes and widening the scope of the collected data. In 2024, HAKOM will enable dynamic reporting on electronic communications market indicators on its website in order to offer users a better overview of market conditions.

A number of regular activities will be carried out for the purpose of implementing or supervising the implementation of various regulatory obligations imposed on operators with significant market power (SMP operators) in the markets subject to ex ante regulation: **the margin squeeze test (MST)**, which is carried out for all retail offers in the broadband market submitted by entities subject to the MST, tracking various wholesale KPIs, amending standard offers, etc. In addition to amending the standard offers of SMP operators, HAKOM will also issue opinions on standard offers for access to networks co-financed from EU funds.

Regular activities are coupled with **the analyses of relevant markets subject to ex ante regulation** (carried out once in three years, or, in accordance with the new ECA, once in five years). Focusing on market conditions, these analyses create the basis for defining regulatory measures appropriate for obstacles that may occur in the market in the absence of regulation. HAKOM will specify proportionate and justified regulatory measures taking account of the protection of competition, effective investments and the protection of interests of end-users.

The year 2023 saw the completion of **the analyses of the wholesale broadband access market**, which, based on a detailed geographical market analysis, for the first time defined the geographical segmentation of the high-capacity services market. The analyses resulted in the deregulation of the areas where the market was found to strive towards effective market competition, primarily due to alternative operators' investments into VHCNs. In the areas where HT, as an operator with significant market power, is still regulated, HAKOM will bring regulatory obligations in compliance with the provisions of the new analysis. This primarily refers to the MST methodology and the introduction of the EoI obligation.

The second quarter of 2024 will see the completion of **the analyses of the wholesale high-quality access market** (wholesale dedicated capacity market), started in April 2023. These analyses will also involve a detailed geographical analysis, which may result in the geographical segmentation of the market or the segmentation of regulatory measures.

In 2023, HAKOM updated the existing BU-LRIC+ cost model, which is to be used to set the **regulated wholesale prices** of operators with significant market power in wholesale broadband access markets in the first quarter of 2024 and in the wholesale high-quality access market (wholesale dedicated capacity market) in the second quarter.

The regulated cost-oriented prices of operator services are calculated using **the weighted average cost of capital (WACC)**. WACC values are updated annually in accordance with the methodology defined in the European Commission (EC) Notice² and the updated WACC is used when adopting or amending decisions on prices. The WACC value is important for further investments because it defines the return on investment to which SMP operators are entitled when investing in the infrastructure.

In addition to the above-mentioned asymmetric regulation (focused on the SMP operator in a defined market), HAKOM also imposes **symmetric access obligations**, applicable to all operators irrespective of the established SMP status. The year 2023 saw the development of the cost model for the application of the economic replicability test, which will be used to

2. Commission Notice on the calculation of the cost of capital for legacy infrastructure in the context of the Commission's review of national notifications in the EU electronic communications sector (2019/C 375/01) is available at the following [link](#)

verify the possibilities of the economic replication of VHCNs. In the cases where it is established that economic replication is impossible, HAKOM will define conditions for access in the point of access for which it is established that technical and economic replication of an efficient operator is not possible.

The [Roaming Regulation](#) (2022/612), in application since July 2022, extended the “roam like at home” scheme until 2032. The Regulation sets **wholesale roaming price caps** that should enable operators to recover their costs. In 2025, the European Commission will review existing wholesale roaming price caps on the basis of the cost model that started to be developed in 2023. This cost model will also be used to calculate costs for **mobile termination rates (MTR)**. Specifically, the EC adopted a delegated act³ in December 2020, aimed at achieving EU-wide harmonisation, with single EU/EEA termination rates determined for this purpose. As the EC delegated act requires that the justification of determining single EU/EEA termination rates be reviewed every five years, these reviews will be informed by the conclusions of the mentioned project. HAKOM will also be actively involved in the project, in cooperation with operators.

As regards issuing licences for the RF spectrum and the obligation of providing MVNOs with network access, HAKOM will monitor and supervise whether operators meet all obligations imposed on them under RF spectrum licences and whether network access is enabled under the conditions that facilitate effective market competition and the development of innovative services for end-users.

In order to assess whether offers for the MVNO access enable market entry to operators without a mobile communications network and their fair competition with operators offering bundled fixed and mobile services, HAKOM will in 2024 develop **a model for the assessment of economic replicability of the network operator’s retail offers in the context of the MVNO access**, taking into account various modalities of the wholesale MVNO access and associated retail costs as well as corresponding practice in the EU.

Market Day, a conference for the stakeholders of the electronic communications market, which is to be organised in the autumn, aims to gather all interested parties, such as the representatives of operators or consumer protection associations, present the results achieved in the previous year from the regulator’s perspective and announce future activities. The conference will provide a forum for the discussion of current electronic communications market conditions and the direction of its development.

3. Commission Delegated Regulation (EU) 2021/654 of 18 December 2020 supplementing Directive (EU) 2018/1972 of the European Parliament and of the Council by setting a single maximum Union-wide mobile voice termination rate and a single maximum Union-wide fixed voice termination rate is available at the following [link](#)

Construction and the ECI

The analysis of the regulatory framework for the electronic communications infrastructure (ECI) and very high capacity networks (VHCNs) – the analysis will aimed at promoting joint investments and reducing ECI and VHCNs’ construction costs, serving as a basis for HAKOM to cooperate in the procedures of amending the subordinate legislation that either has a direct impact on enabling the use of the existing ECI and associated facilities or defines technical and other conditions for the construction of new electronic communications networks. The cooperation on regulatory amendments will be focused on enabling the wide accessibility of VHCNs for residential, commercial and other objects.

HAKOM will participate in the work related to **the gigabit infrastructure act (GIA)**, which aims at increasing investments in gigabit networks and facilitating their roll out by removing existing obstacles to their development, i.e., by improving the coordination of civil engineering works, expanding access obligations for infrastructure as well as by streamlining and digitalising permit-granting procedures. The act will replace the Broadband Cost Reduction Directive from 2014.

The supervision of regulatory compliance obligations will include monitoring **key performance indicators (KPI) connected with the use of the ECI**. Special attention will be paid to the submission and realisation of requests in line with the Standard offer of Hrvatski Telekom, which is related to the manner and conditions of access to and shared use of the ECI and associated facilities, including cable ducts.

The collection, processing and cartographic representation of broadband coverage data will continue. The collected and processed data on the availability and use of broadband speeds as well as data on the expression of commercial interest in the construction of VHCNs are published via the geographic information system (GIS). The system aims to identify the areas acceptable for the co-financing of the construction of electronic communications networks through government aid, while also enabling monitoring and analysing market and investment development. All relevant data comprised by this measure will be available in the electronic form and disclosed on the HAKOM’s website by means of GIS portal thematic browsers. Data on broadband availability will be submitted to the EC to enable an integrated display of EU-wide broadband coverage on the European Broadband Mapping Portal.

The basis for cooperation with the State Geodetic Administration (SGA) on the establishment of a common database of the ECI cadastre is provided for by the [State Survey and Real Estate Cadastre Act](#) and the [National Spatial Data Infrastructure Act](#), with the SGA being responsible for the establishment of the Central Repository of the Cadastre of Lines with the GIS ECI

module (Geographic Information System of the Electronic Communications Infrastructure and Associated Facilities), i.e., a single base aimed at ensuring access to spatial data on the constructed ECI and available electronic communications capacities in the HR. The exchange of data on the ECI between HAKOM and the SGA will be established via HAKOM's future GIS software.

The right of way and the right of servitude regulate the right of access to, installation, use, repair and maintenance of the ECN, ECI and associated facilities, including cable ducts, as well as other related rights that impose a burden on the real estate on which the ECI and associated facilities have been constructed. Also regulated is the use of the common good property and the real estate of others on the basis of the right of way for the new ECI. As the infrastructure operator is required to pay the right of way fee to the common good manager or the real estate owner, HAKOM will continue to address the requests submitted by real estate owners or common good managers to identify the infrastructure operator and determine the amount of the right of way fee.

Guidelines and opinions in the procedure of preparation and adoption of physical plans will be issued on an ongoing basis. Pursuant to the provisions of the [Physical Planning Act](#), HAKOM participates, in accordance with the provisions of the ECA, Article 59, paragraphs (3) and (11), in the physical plan adoption procedure, from the submission of a request (the competent planning authority's decision to commence developing a plan or amending an existing plan) to participation in public consultations, providing a written opinion on the draft proposal of a physical plan aimed for public consultations.

As a competent public authority in the area of construction, HAKOM **establishes special conditions for construction/connection conditions and issues main project certificates**. The process of establishing special conditions for construction/connection conditions and issuing main project certificates has been fully digitalised by the e-Licences internet service. The digitalisation has created preconditions for the partial automation of the process, which is to continue to be developed.

Pursuant to the provisions of the ECA, HAKOM will **assign broadband ready labels** to all new constructed buildings and buildings that have undergone major renovation, marking them as ready for providing the high-speed internet access service.

Services

Cooperating with operators and other competent HR and EU institutions, HAKOM plays an important role in ensuring **the security of electronic communications networks and services**, which becomes increasingly important due to their fast development. HAKOM analyses risk assessment, the risk treatment plan and the revisions of security of networks and operator services as well as security incidents reported by operators in accordance with the [Ordinance on the manner and deadlines for the implementation of measures for the protection of security and integrity of networks and services](#), thereby gaining an insight into the state of security of networks and operator services and the adequacy of the implemented measures. HAKOM will put forward its proposals for the improvement of security of networks or services and timely report on the breaches of security of Croatian communications networks or services to the European Union Agency for Cybersecurity (ENISA) and competent national regulatory authorities of other EU Member States.

The EU adopted the new [NIS 2 Directive](#) (Directive 2022/2555) in order to eliminate the problems detected during the application of the previous directive. The NIS 2 Directive aims to achieve an efficient management of the organisation and security processes in the EU's cyberspace and in the national cyberspaces of the Member States. The timing of this directive is critical as the EU is already behind schedule with the regulation of cybersecurity relative to the technological development. The NIS 2 Directive is the EU's central act on cybersecurity, but also just one act within the EU's cybersecurity package proposed in 2022, which also includes the DORA Regulation⁴ (financial sector) and the CER Directive⁵ (critical infrastructure). The NIS 2 Directive is also connected with the CSA⁶ (cybersecurity certification) from 2019, while the CRA⁷ (cybersecurity requirements for products and services) is undergoing the agreement procedure.

In 2024, **the national task force for the transposition of the NIS 2 Directive** will continue work on the development of the new **Cybersecurity Act and the accompanying subordinate legislation** as well as **the new cybersecurity strategy** of the HR. In addition, continuing cooperation with the members of **the cyber crisis management working group** (SIA, MoI, ISSB, CARNET, NCERT, HAKOM, CNB), HAKOM will work on raising the awareness of all instituti-

4. The Digital Operational Resilience Act, the key act of the EU's financial sector, which directly applies to all Member States, was adopted on the same day as the NIS 2 Directive (in addition to the Ministry of Finance (MF), the competent authorities for the implementation in the HR are the CNB and HANFA).

5. The Critical Entities Resilience Directive is the EU's key act for the critical infrastructure that all Member States are obliged to transpose within the same deadline as the NIS 2 Directive, following a closely related approach: the CER Directive covers the physical security and the NIS 2 Directive the cybersecurity; the CER Directive is related to the key sectors referred to in Annex I of the NIS 2 Directive and all critical entities pursuant to the CER Directive (physical security) become essential entities pursuant to the NIS 2 Directive (cybersecurity). The competent authority for the transposition of the CER Directive in the HR is the MoI.

6. The Cyber Security Act, adopted in 2019, which directly applies to the EU Member States, redefined the ENISA as the European Union Agency for Cybersecurity, while also establishing the common EU cybersecurity framework.

7. The Cyber Resilience Act will directly apply to all Member States, its purpose being to establish the EU's obligations related to the security certification of certain commercial products, including the Internet of Things category, devices with built-in software or internet connection and software in general.

ons about the conditions of the HR's cyberspace as well as about various phenomena and trends observed in the context of functional and sectoral responsibilities of participating institutions. This contributes towards increasing the level of awareness and facilitating knowledge exchange, while raising the level of trust and mutual understanding of key national institutions as regards nationally available capacities and skills. Within the national SOP⁸ HAKOM will prepare quarterly situational reports for the electronic communications sector and timely resolve potential cyber crises in this sector and related sectors.

In 2024, the National Cybersecurity Council will continue work on the national **implementation of the 5G Toolbox**, in particular of technical measures comprised by the 5G Toolbox, prescribed by the [Ordinance on the manner and deadlines for the implementation of measures for the protection of security and integrity of networks and services](#). The effects of the implemented measures will be assessed in cooperation with the EC, primarily with the NIS (Network and Information Security) Cooperation Group, so that further steps can be determined.

HAKOM is entrusted with the task of **managing the addressing and numbering space** in electronic communications, which involves the monitoring of market conditions, the timely preparation of addressing and numbering plans, the prompt assignment of addresses and numbers and the adoption of necessary regulations enabling users the portability and use of the addressing and numbering space. HAKOM is also responsible for **the Central Administrative Database of Ported Numbers (CADPN)** and will take care of its maintenance and development, acting in tune with the wishes of users and operators. HAKOM is also responsible for the HR's addressing and numbering space database [e-Operator](#), which will be regularly maintained to enable operators to electronically submit requests for the primary allocation, revocation or transfer of rights to use addresses and numbers.

Network neutrality and open internet are important for market development and end-users. Pursuant to [Regulation \(EU\) 2015/2120](#) of the European Parliament and of the Council of 25 November 2015 laying down measures concerning open internet access and amending Directive 2002/22/EC on universal service and users' rights relating to electronic communications networks and services and Regulation (EU) No 531/2012 on roaming on public mobile communications (TSM Regulation), HAKOM ensures the protection of open internet access. In 2024, HAKOM will continue to supervise:

i) the manner of implementation of the operator transparency requirement under the TSM Regulation (e.g. clearly defined minimum, maximum and normally available internet access speeds in the fixed network and estimated speed in the mobile network);

ii) the operator traffic management measures and the duration of measures going beyond reasonable traffic management measures, e.g. those applied in the case of congestion or to protect network security;

iii) the impact of specialised services on the internet access service (access and core network);

iv) measures to prohibit the blocking or congestion and slowing down of certain applications.

The quality parameters of the provision of public voice services will be monitored and analysed by collecting data from operators and **the quality of provided internet access services** by means of user applications [HAKOMetar](#) and [HAKOMetar Plus](#), including the control of parameters on internet openness. In addition to ensuring open internet and net neutrality, HAKOM will also control the compliance of the roaming service with the TSM Regulation.

According to currently available data, three quarters of the EU population have no access to **the IPv6 protocol** and there are major differences across Member States in its application. In addition, the BEREC's Open Internet Working Group has noted that public IP addresses are key for enabling users to realise their rights to use and provide applications and services, as specified in the TSM Regulation. Therefore, in 2024, HAKOM will, in cooperation with other national institutions, primarily the Central State Office for the Development of the Digital Society (CSODDS) and CARNET, work proactively on the national promotion of the IPv6 transition.

Universal services in electronic communications represent the minimum set of electronic communications services of a specified quality that must be available to all end-users at an affordable price throughout the HR territory, regardless of their geographical location, with as little distortion of competition as possible. A key principle and goal of the electronic communications market regulation in the HR is to ensure **access to universal services** for all users of electronic communications services, which also includes ensuring an appropriate quality of universal service provision. Once in three years, HAKOM conducts the procedure of assessing the need for defining the universal service operator. In 2024, HAKOM will therefore carry out an **analysis of the universal service provision quality**, taking into account the outcomes of the geographical review as referred to in Article 58 of the ECA, if these are available, and, as appropriate, all additional evidence that the availability of universal services cannot be ensured under common market circumstances or by means of other potential mechanisms of national public policies. The procedure applies equally to setting affordable prices for universal services.

HAKOM promotes the development of the machine-to-machine (M2M) communication and the Internet of Things (IoT). It is essential for future development to examine M2M/IoT services

8. Standard Operating Procedure (coordinator: SiA, members: MoI, ISSB, CARNET NCERT, HAKOM and CNB).

within the EU electronic communications regulatory framework and analyse potential market barriers, such as, among others, limited resource distribution, standardisation, international roaming, switching operators, number portability as well as cybersecurity and data privacy.

Consumer protection

Well-informed and educated users will find it easier to select among the available services those that are best suited to their needs and to verify the accuracy of the user-operator contractual relationship. Such users will better address any challenge encountered while using electronic communications. As such a preventive approach has proved to be efficient, HAKOM will complement direct communication with users (telephone contact, e-mail, Ask Us application and social networks) with the cooperation of HAKOM's experts with consumer protection associations and other public authorities in charge of consumer protection policy. Educational workshops on users' rights in electronic communications will be organised during the year and users will be able to make use of leaflets, brochures and educational videos featuring useful advice. These materials will be distributed to users and consumer protection associations and used during educational workshops. All materials will be available on the HAKOM's website and free to download for the purpose of informing or educating users. Part of the educational activities will be performed by means of the applications developed by HAKOM: [Quiz](#) and [Privacy Calculator](#).

The work of **operator consumer complaint commissions** will continue to be monitored and, based on the analyses carried out and achieved results, operators will be provided guidance for the improvement of this business segment and inspection supervisions will be conducted if necessary. Regular **semi-annual and annual reports on the work of operator commissions and the HAKOM's commission** will be published on the HAKOM's website, with the focus on the detailed analysis of users' complaints and operators' responses in the first and second phase of the procedure that end-users undergo before submitting dispute resolution requests to HAKOM.

HAKOM will continue to analyse and verify review **operators' general operating terms and conditions, special conditions for service use and price lists**, bringing them into compliance, if necessary, with regulations in effect.

In 2024, HAKOM will pay special attention to the youngest users and the education of **children, young people, parents and teachers about protection on the internet**. In February 2024, HAKOM will mark the Safer Internet Day with operators and interested stakeholders. All primary schools in the HR will be provided with updated brochures containing the most important advice for children

and parents on the safe use of internet in the school year 2023/2024. Schools will organise workshops for parents and children, in accordance with their needs and abilities. Children, young people and schools will have access to the Privacy Calculator, a free application made to raise users' awareness and inform them of internet fraud, containing fraud scenarios and a catalogue of frauds.

The accessibility of electronic communications services to persons with disabilities has been an especially important topic for a number of years. In addition to meeting all obligations under the ECA, activities aimed at increasing accessibility will in 2024 also focus on the promotion of universal design and accessible solutions as well as on raising the awareness of all market stakeholders. At mid-2024, HAKOM will organise an international conference on the topic of persons with disabilities in the markets it regulates, which will enable the exchange of experiences and ideas for improving accessibility and raising awareness of these issues in the society.

Users will continue to have at their disposal the user application **HAKOMetar**, a tool for measuring broadband access speeds in the fixed network, which enables the checking of the contracted speed. The measurement results are acceptable as evidence in the end-user complaint resolution process. Also available to users is **HAKOMetar Plus**, a tool for the informative measuring of internet access quality in mobile and WLAN networks as well as checking internet openness and neutrality parameters. Part of the activities will be focused on the revision of the **Cost Estimator** application, with an aim to enable users to more easily find the most favourable tariff in accordance with their habits and needs. HAKOM will continue to maintain the [Do Not Call Register](#), which enables users to confirm by entering their telephone numbers in the Register that they do not want to be contacted by traders by telephone or sent SMS or MMS messages. Traders will still be able to access and check numbers in the Register and through the internet service. The upkeep of the register is the result of cooperation with the Ministry of the Economy and Sustainable Development (MESD).

Inspection supervisions in electronic communications

HAKOM plans to conduct regular and extraordinary controls and supervisions of operators' business operations in order to improve the protection of users, the safety of networks and services, the regulation of the market and the use, access to and construction of the electronic communications infrastructure.

The protection of users will be focused on transparency and the quality of service provision as well as on the changes of contracted services. The controls of the points of sale and user services are planned to be carried out during the year. The security of networks and services will be strengthened by the analyses of security incidents, by the verifications of operators' protection measures,

by the revisions of security policies and by the controls of operators' calculation and collection systems. As regards the construction, access to and use of the ECI), inspection supervisions will be focused on the control of the regulatory framework for the reduction of the ECI construction costs, the review of the ECI database, the control of the infrastructure maintenance and the implementation of standard offer for the ECI. The verification of regulatory obligations set forth by HAKOM's decisions will include compliance with the obligations and the conduct of the margin squeeze test, non-discrimination and transparency as well as the potential abuse of market power.

Electronic communications market activities in 2024					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
1.	Harmonise regulatory obligations of SMP operators with the analyses of the wholesale broadband access market	Harmonised regulatory obligations of SMP operators with the analyses of the wholesale broadband access market	I	N	2.1, 2.2
2.	Harmonise the Margin squeeze test methodology with the provisions of the analyses of the wholesale broadband access market	Harmonised document Margin squeeze test methodology	II	N	2.1, 2.2
3.	Complete the analysis of the wholesale dedicated capacity market (M2/2020, i.e. M4/2014 & exM14/2003)	Completed analysis of the wholesale dedicated capacity market	II	N	2.1, 2.2
4.	Apply the economic replicability test to ensure symmetrical regulation	Economic replicability test is applied to ensure symmetrical regulation	I	N	2.1, 2.2
5.	Update WACC values	WACC values updated	IV	N	2.1, 2.2
6.	Set regulated wholesale prices on the basis of the updated BU-LRIC+ cost mode.	New wholesale prices set	I	N	2.1, 2.2

7.	Develop a model for the assessment of economic replicability of network operator's retail offers in the context of the MVNO access	Developed model that will be used for the assessment of economic replicability of network operator's retail offers, taking into account various modalities of the wholesale MVNO access and pertaining retail costs	IV	N	2.1, 2.2
8.	Amend and supplement standard offers.	New wholesale conditions in standard offers	ongoing	N	2.1, 2.2
9.	Issue opinions on standard offers for access to networks co-financed from EU funds	HAKOM's opinions regarding standard offers	ongoing	N	2.1,
10.	Conduct the margin squeeze test (MST)	Tariff packages/offers of operators subject to the MST in accordance with the Methodology	ongoing	N	2.1,
11.	Develop dynamic reports on EC market indicators on the HAKOM's website.	Dynamic reports published on the HAKOM's website	IV	N	2.1, 5.1, 5.2
12.	Collect and disclose data on the EC market condition	Reports on electronic communications markets' indicators	quarterly	N	2.1, 5.1
13.	Supervise the implementation of regulatory obligations,	Analysis and disclosure of regulated wholesale KPIs, supervision administrative acts	ongoing	N	2.1, 2.2
14.	Resolve regulatory disputes between operators	Administrative acts	ongoing	N	4.2
15.	Implement activities related to roaming regulation	Support to BEREC and operators	ongoing	N	4.1, 1.1
16.	Monitor and supervise the implementation of obligations for the MVNO access	Enabled access to MVNOs	ongoing	N	2.1, 2.2

1. Plan rashoda uključuje razrede: 31 i 32, bez odjeljaka 3211, 3213, 3232, 3233, 3237, 3238, 3239, 3221 i 3225

17.	Analyse security risk assessments, the risk treatment plan and operators' revisions.	Internal report and/or Inspection supervision	III	N	1.3	27.	Supervise the quality of universal service provision in electronic communications	Annual report on the universal service provision quality	ongoing	N	1.2
18.	Process reported security incidents	Internal report and/or intersectoral report and/or inspection supervision	ongoing	N	1.3				quarterly II		
19.	Analyse the security of networks and services and publish the collected data	Reports on cyber incidents and network security Quarterly reports (SOP) Annual reports (SOP, ENISA)	quarterly II	N	1.3	28.	Carry out an analysis of the universal service provision quality	Analysis of the universal service quality	IV	N	1.2
20.	Implement the NIS 2 directive in cooperation with other public authorities from the national working group	Proposals of legal amendments	IV	N	1.3	29.	Selection of the USO operator	Decision of the Council on the appointment of the USO operator	IV	N	1.2
21.	Implementation of the CER directive in cooperation with other public authorities from the national working group	Proposals of legal amendments	IV	N	1.3	30.	Process registration applications and notifications on the start or termination of provision of electronic communications services	HAKOM's certificates and updated list in the e-Operator EU register of operators updated with HR operators	ongoing	N, 3238	2.2
22.	Promote the use of IPv6 addresses with other relevant authorities	National report, workshop	IV	N	1.1	31.	Resolve user complaints with electronic communications operators.	HAKOM's administrative acts akti	ongoing	N	1.1, 4.2
23.	Implement net neutrality rules (TSM Regulation)	Operators work in accordance with the TSM Regulation Opinions and comments for BEREC Annual Report for BEREC and EC	ongoing ongoing II	N	1.1	32.	Analyse the work of operator consumer complaints commissions.	Semi-annual and annual reports	I and III	N	1.1
24.	Analyse quality parameters of operators' service provision	Semi-annual reports	I and VII	N	1.1	33.	Cooperate with the representatives of operator consumer complaints commissions	Recommendations for improvements in the processing of consumer complaints	ongoing	N	1.1
25.	Manage the addressing and numbering space	Numbering and addressing plan	ongoing	N	2.3	34.	Analyse general terms and conditions, special conditions and price lists	Amendments due to deficiencies	ongoing	N	1.1, 4.2
26.	Ensure and monitor the number porting process	CADPN in operation	ongoing	N	1.1	35.	Monitor and measure the quality of provided services, simple and transparent selection of service providers.	Applications under construction: HAKOMETar HAKOMETarplus Cost estimator	ongoing	N, 3238	1.1
						36.	Maintain Do Not Call Register and cooperate with the MESD, traders and users	Register operational, accessible to users and traders	ongoing	N, 3238	1.1

37.	Information and education of users	Brochure, leaflet and video Workshops and lectures, media appearances, social media posts	ongoing	N, 3233	1.1
38.	Increase accessibility for persons with disabilities	Accessibility of services and products to persons with disabilities Project with FEEC PWD conference held	ongoing IV II	N, 3239	1.1
39.	Respond to user inquiries	Responses given in the shortest possible period	ongoing	N	1.1
40.	Carry out inspection supervisions in the area of electronic communications	Supervision administrative acts	ongoing	N	1.1
41.	Issue and publish expert opinions	Expert opinions	ongoing	N	1.1
42.	Educate and raise awareness of the protection of children in electronic communications	Safer Internet Day marked in February Workshops for children and young people	ongoing	N, 3233	1.1
43.	Supervise the implementation of regulatory obligations for the ECI	Analysis of regulated KPIs of the shared use of cable ducts	ongoing	N	4.1
44.	Implement the NIS 2 Directive in cooperation with other public authorities from the national working group	Proposals of regulatory amendments	ongoing	N	4.1
45.	Enhance the system of collecting data for the geographical review of coverage by broadband networks and their use (mapping) – GIS portal	Improved GIS portal	IV	N	3.1
46.	Collect and process data on the broadband access coverage.	Graphical display accessible on the GIS portal	ongoing	N, 3237	3.2

47.	Issue opinions in the procedure of drafting and adopting physical plans and public consultation, including the State Plan for Spatial Development	HAKOM's opinions	ongoing	N	3.1, 5.1
48.	Establish special conditions for construction/connection conditions/grant main project certificates	HAKOM's administrative acts	ongoing	N	5.1
49.	Identify the infrastructure operator (right of way)	Right of way certificates	ongoing	N	1.3
50.	Issue Broadband Ready labels for new constructed buildings and buildings that have undergone major renovation	Broadband ready labels	ongoing	N	3.1

03

**Postal
services**



In the previous few years, the postal markets in the EU and HR have seen major changes due to the pandemic, war in Ukraine and digitalisation of society. Nevertheless, the key postal market trends have persisted: total revenues increased, the volume of letters grew and parcel services increased significantly.

HAKOM keeps adjusting its regulatory activities to new market conditions and trends. The planning of future activities will require that consideration be given to the proposals and initiatives that are currently being discussed at the global and European levels. Special attention should be paid to new postal sector regulations, which are aimed at adjusting services to users' new needs and market changes.

Focus will continue to be given to ensuring the sustainability of the universal service in the whole territory of the HR, while complying with the prescribed quality. Work will continue on promoting and creating conditions for fair competition and removing barriers for investing in and developing the postal sector. The protection of postal service users will remain a major priority.

Regulatory activities

Regulatory activities are primarily prescribed by **the Postal Services Act** and the accompanying subordinate regulation, which are aligned with the provisions of international regulations (EU Postal Directive, Regulation on cross-border parcel delivery services and the acts of the UPU).

HAKOM's responsibilities include **monitoring and analysing the conditions and development of the postal services market** as well as taking appropriate measures to ensure fair and efficient market competition. This will be carried out by the ongoing collection of statistical, financial and other data from all postal services providers, which will serve as a basis for analyses required for the adoption of regulatory decisions and the preparation of reports on market indicators and trends. The collected data will also be used to meet the requirements imposed by organisations in charge of the monitoring and analysis of the EU postal market (EC, ERGP, UPU, etc.), respond to various inquiries (providers, journalists, etc.) and meet the needs of the Ministry of the Sea, Transport and Infrastructure (MSTI) and some government authorities and institutions (CBS, CCA and others).

Part of HAKOM's activities will be focused on the **fulfilment of obligations of all postal services providers pursuant to the PSA**, which in particular refers to the monitoring of compliance of submitted amendments to the general terms and conditions of postal services providers and their price lists and imposing amendments or revocation in the cases of non-compliance with

the PSA. HAKOM will be receiving the applications of new postal services providers as well as the notifications of removals and/or status changes of existing providers; the Register of postal services providers will be kept on a regular basis⁹. HAKOM will also be monitoring and verifying the regularity of prescribed procedures related to the protection of postal services users.

In the forthcoming period, based on the regulatory impact assessment of **the structure of the universal service provider's postal network**, the network structure will be revised in order to ensure functionality and accessibility.

HAKOM will continue to monitor market conditions with regard to the obligation, conditions and prices of the universal service provider's **postal network access** in order to enable access under equal conditions and fair competition to all access users (providers of interchangeable postal services, consolidators and large users). Based on the results of the analysis, HAKOM will, as appropriate, impose prescribed regulatory measures to amend the conditions and prices of network access and carry out the prescribed procedure in case it receives a request for the resolution of a dispute related to network access. Regulatory activities will also be focused on the monitoring of new modalities of service provision related to e-commerce that may potentially be classified as postal services as well as on their regulation in accordance with the PSA and creating equal conditions in the parcels market.

Regular activities will include giving **expert opinions** and explanations regarding the applications of the PSA and subordinate legislation, as well as responding to the inquiries of interested citizens and legal persons.

HAKOM's regulatory activities in international postal traffic are partly related to regulation in the EU's single market for postal services and partly to universal service provision in the global market. Given the amendments to the global and European regulatory frameworks announced for the following mid-term period, HAKOM will focus on discussions and proposals, so as to be able to actively participate in the preparation and harmonisation of international regulations and their transposition in the Croatian legislation as well as to inform all postal market stakeholder about the proposed amendments. Some activities will continue to be devoted to meeting the obligations under **the Regulation on cross-border parcel delivery services**, involving the statistical and financial monitoring of cross-border parcel traffic and the monitoring of postal services prices. HAKOM will, in accordance with the established methodology, carry out an assessment of cross-border tariffs applied to some services provided by universal service providers, i.e., their revaluation/justification assessment. Data on prices and the tariff assessment will be submitted to the EC for publication.

⁹. The list of providers is available at <https://www.hakom.hr/hr/davatelji-usluga/288>

A round table will be held for all interested parties to provide for a dialogue with postal market participants. HAKOM will be open for cooperation, consultations and meetings with all stakeholders.

Universal service

Universal service is in the interest of the HR, whereas **Hrvatska pošta d.d. (HP)** has the right and obligation to provide universal service. (HP) The bulk of HAKOM's regulatory activities therefore includes the control of the fulfilment of the universal service obligation pursuant to the PSA and the Ordinance on the provision of universal service. The control primarily includes the verification of compliance of general terms and conditions, price lists and other acts adopted by the universal service provider as well as the implementation of measures to amend or revoke these acts if they are not in compliance with the PSA and the Ordinance on the provision of universal service.

Special attention will be paid to **the prescribed network density** of HP's access points due to potential changes in the number and locations of postal offices and other access points as well as to compliance with the prescribed procedure in the case of closure or moving/reorganisation of postal offices. Postal offices' working hours will also be monitored and regulated as required. The control of the fulfilment of the universal service obligation will encompass the verification of permitted deviations in the performance of universal service as set forth by the Ordinance, with a special focus on exemptions from the obligation to deliver postal items to home address and interruptions in postal traffic caused by force majeure.

HAKOM will focus some of its regulatory activities on one important segment: **the quality of universal service provision**. The prescribed measures will be ensured by carrying out inspection supervisions and by monitoring quality. Once it receives **the Report on the quality of provision of universal service** from HP, which is obligated to perform quality measurements, HAKOM will perform an independent audit and verify results from the Report, focusing on those related to the end to end quality of postal items. The audit results will serve as a basis for the implementation of adequate corrective measures if service quality fails to meet the prescribed criteria.

As in the previous years, HAKOM will perform an audit of the Regulatory Financial Statement (RFS), submitted BY HP, pursuant to the obligation of **accounting separation of revenues and costs**. Accounting separation is performed according to the methodology set forth in HAKOM's [Instruction](#), while the reliability of accounting operations will be verified by an audit. Upon the completion of the audit, HAKOM issues a Statement of (Non) Compliance with the Methodology and, based on the audited RFS, carries out other regulatory activities, including the calculation

of **the cost of an unfair financial burden (net cost)** on the universal service provider. Specifically, the universal service provider is entitled to the reimbursement of the net cost when universal service obligation generates an unfair financial burden. When it completes the verification, HAKOM will adopt a decision specifying net cost, which is paid from the state budget.

One of the activities will be related to monitoring the prices for the basket of services from the scope of universal service according to the [Price Cap Calculation](#) for the period from 2023 to 2025. In accordance with the prescribed methodology, an analysis will be conducted of the deviations from the planned values of key parameters that have an impact on the price of the basket.

Consumer protection

HAKOM's key activity is the protection of rights of postal services users, with a special accent on **the resolution of disputes between users and postal services providers**. Part of HAKOM's activities connected with the protection of users will involve dispute resolution proceedings conducted in accordance with the PSA. The information gathered in the course of disputes will also be used for making corrections in the market by means of inspection supervisions or, where necessary, the improvements of subordinate legislation or the general terms and conditions of providers. Based on the analyses of disputes, HAKOM will issue recommendations and guidelines, aimed at establishing a uniform business practice and a more efficient resolution of users' complaints in the previous phases of the procedure as well as eliminating observed inconsistencies. Some activities will also be preventive, involving education and information about users' rights. Information interesting to users will be regularly published and educational activities will be carried out in cooperation with consumer associations.

Inspection supervisions

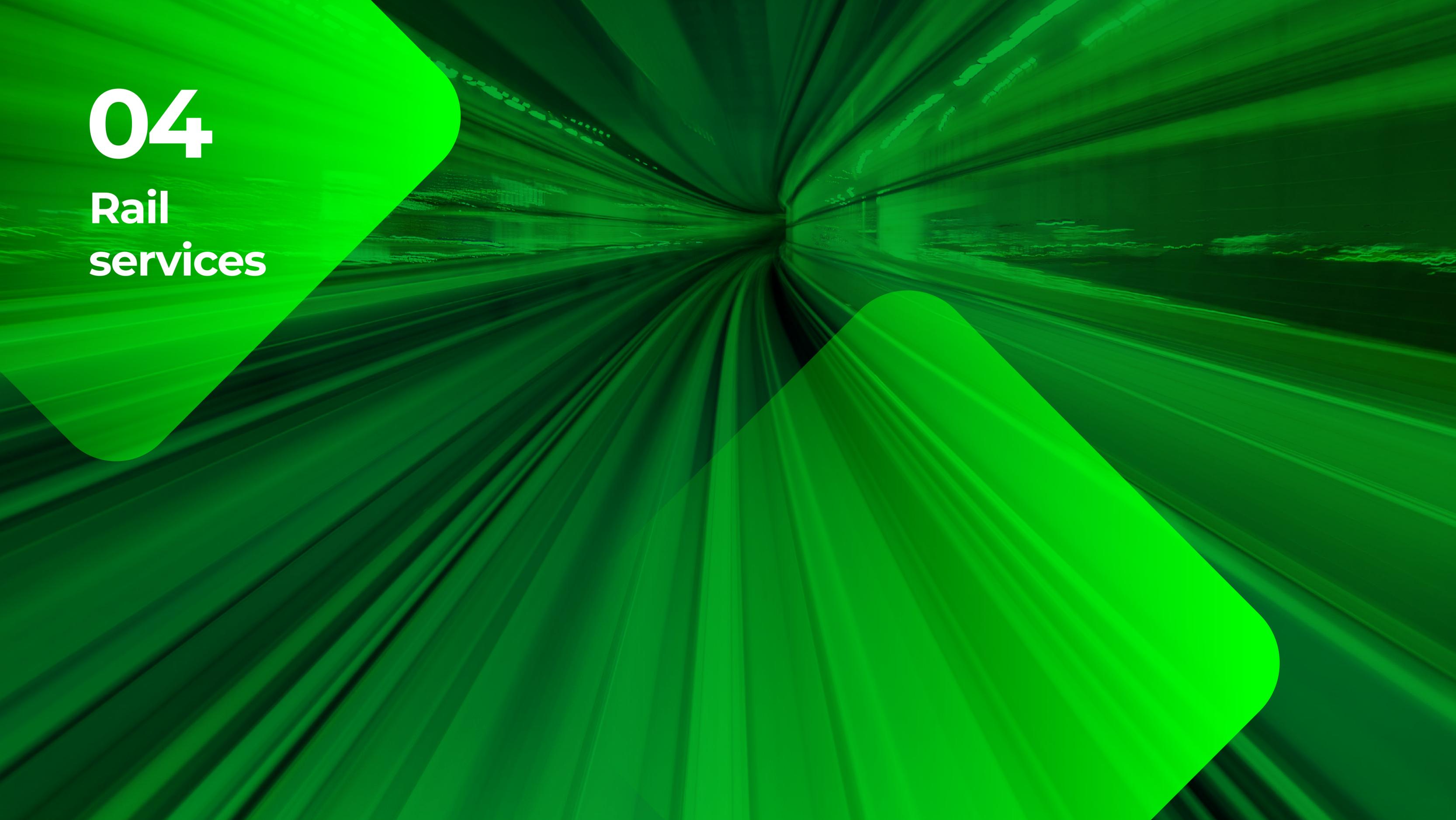
HAKOM's regulatory activities are partly associated with inspection supervision over the application of regulations on the provision of postal services aimed at the regulation of the postal market. Supervision pays special attention to the fulfilment of obligations of the universal service provider relating to the provision of universal service and the protection of users' rights with all providers. The majority of inspection supervisions will be carried out according to the Annual Inspection Plan or, in a smaller measure, based on information on potential irregularities and regulatory violations, i.e., user complaints. Depending on the facts established, postal inspectors will take measures and activities within their competence pursuant to the PSA and all adopted administrative acts will be published on HAKOM's website.

Aktivnosti na tržištu poštanskih usluga u 2024.					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
1.	Analyse the organisation of the postal network.	Amendments to the Ordinance on the provision of universal service	II	N	4.2
2.	Collect and process data on the postal services market	Reports on postal services market indicators	quarterly	N	2.1
3.	Meet the requirements pursuant to the Regulation on cross-border parcel delivery services	Data submitted to EC bodies	III	N	4.1
4.	Control the fulfilment of universal service obligation	Verified delivery, postal network density, postal offices' working hours, etc.	ongoing	N	1.2
5.	Analyse the five-day delivery obligation	Review of the conditions related to the five-day delivery	III	N	1.2
6.	Control the calculation of the price cap for a part of the universal service	Verified key parameters that influence the price limit and price adjustment	I, III	N	1.2
7.	Monitor and analyse prices and discounts for universal service	Affordable and cost-oriented prices for all users	ongoing	N	1.2
8.	Monitor and analyse prices and discounts for interchangeable postal services	Application of prices in accordance with the postal service price list	ongoing	N	1.2
9.	Control the conditions and prices of access to the universal service provider's postal network	Access to the universal service provider's postal network enabled to all users under equal conditions	ongoing	N	2.1
10.	Resolve regulatory disputes	HAKOM's decisions	ongoing	N	2.1

11.	Review the obligations of all postal services providers	Verified providers' registrations/removals, logbook keeping, general terms and conditions, price list, status changes, etc.	ongoing	N	2.1
12.	Monitor the impact of e-trade and digitalisation on the postal services market and the emergence of new methods of postal services provision	Registration of new postal services providers and new services and equal conditions created for all market stakeholders	ongoing	N	2.2
13.	Supervise the implementation of the accounting separation obligation	RFS audit Compliance statement	III	N, 3237	2.1
14.	Establish the unfair financial burden on the universal service provider (net cost)	Revision of requests for the reimbursement of net costs Decision on the net cost amount	IV	N, 3237	2.1
15.	Analyse the Report on the quality of provision of universal service	Revised Report and corrective measures	III	N, 3237	1.2
16.	Resolve user disputes with postal services providers	HAKOM's decisions	ongoing	N	1.1
17.	Respond to the inquiries and reports of users and other stakeholders of the postal services market	Replies to users and other stakeholders	ongoing	N	4.2
18.	Carry out inspection supervisions in the area of rail services	Supervision administrative acts	ongoing	N	4.2
19.	Issue expert opinions	Expert opinions	ongoing	N	4.2

04

**Rail
services**



The end of the pandemic and the management of the energy crisis created conditions for a more stable functioning of rail transport, which had proved to be a reliable means of transport in the previous period. Given the large infrastructure works underway, the recovery of the rail transport market also depends on the organisation of traffic. HAKOM will strive to protect competition and ensure generally available, transparent and non-discriminatory conditions for offering rail services and rail passenger transport services. For this purpose, HAKOM will continue to carry out all its activities in order to offer a better quality and more reliable service to rail service users, primarily to railway undertakings and the users of rail passenger transport services – passengers.

Regulatory activities

HAKOM carries out most of its activities ex officio, within the supervision of the rail services market, so that in 2024 it will monitor the rail services market according to various parameters, regularly informing the public about that on a quarterly and annual basis and submitting data to the competent ministry and the EC. The model for the calculation of **charges for services provided in the service facilities of the infrastructure manager** will be reviewed. Special attention will be paid to the analysis of the impact of regulatory activities on the rail services market, and on the transport market itself. The development of methodologies for the calculation of charges for rail services provided by service facility operators will also be monitored. HAKOM will gain a realistic insight in the market condition and development and create a solid basis for imposing regulatory measures **by collecting and processing data on market development and the protection of passenger rights**. For the purposes of participation in the working groups of the Independent Regulators' Group of the EU and the EC, HAKOM will be engaged in the preparation and publication of the final analyses of the rail services market condition.

HAKOM will act in an open manner towards the market, directing its activities towards **ensuring equal conditions and non-discriminatory access to rail services, services provided in service facilities and service facilities themselves** to all applicants. By acting proactively ex officio and performing inspection supervisions, HAKOM will control the market, identifying and removing potential barriers in the shortest possible period.

In the implementation of the procedures HAKOM will cooperate with all rail system stakeholders, in particular with the infrastructure manager, the operators of service facilities and railway undertakings, in order to take appropriate measures. Consultations will continue to be held with rail service stakeholders with a view to enabling better regulatory efficiency and quality for the end-users of freight and passenger rail transport.

Access to the rail network and service facilities

[The Railway Act](#) (RA) lays down the right of access to the rail network and service facilities, as well as to all services required for the performance of rail transport. Regulatory activities will remove potential and real barriers to market access and market functioning, promote a simpler use of rail services and rail service providers' market orientation, which is to improve the quality of rail service provision. The application of the IRG Rail documents adopted with regard to publishing the description of the service facility and the obligation of service facility operators will be promoted.

HAKOM will, on an ongoing basis, monitor the preparation, adoption, implementation and application of the conditions and criteria contained in **the Network Statement** and the service facilities descriptions. The key processes will in 2024 once again involve the preparation and publication of the Network Statement as well as of the content of and amendments to reports. The new established system of indicators of the infrastructure operator quality (performance scheme) will be closely monitored.

The Network Statement's importance for the market is emphasised by the fact that it contains links to the service facilities descriptions or the SFDs themselves. The part of the NS that contains important information on all service facilities in the HR territory will therefore be devoted special attention, as in the previous years.

Protection of passengers' rights in rail passenger transport

Pursuant to the [Act on the Regulation of Rail Services Market and the Protection of Passenger Rights in Rail Transport](#) (ARRSM) HAKOM is competent for the protection of passengers' rights in rail passenger transport and for the implementation of [Regulation 2021/782](#) of the European Parliament and of the Council of 29 April 2021 on rail passengers' rights and obligations. As a result, an amendment is planned to the ARRSM in order to prescribe adequate sanctions for the breaches of the Regulation, which is not related only to rail passenger undertakings, but also to infrastructure managers, railway station operators, ticket sellers and travel organisers. HAKOM actively participates in the amendment procedure conducted by the competent ministry.

By mid-2024, the new Regulation will have been in effect for one year. Together with HAKOM's new brochure on passengers' rights and obligations, the Regulation is aimed at providing passengers with the most important information on their rights and obligations and improve their status as specific consumer group. Regulation 2021/782 and other regulations on passenger rights in rail passenger transport will serve as a basis for inspection supervisions and the imposition of measures to revoke unfair contractual provisions and transport conditions as well as to enhance the quality of rail passenger transport.

Disputes between passengers and carriers will be resolved within the shortest period possible, transparently and objectively, in accordance with regulations and on the basis of proposals put forward by the Commission for the Protection of User Rights. Detailed dispute analyses will be used to identify the needs to improve the conditions and manner of transport services provision, monitor market conditions and create grounds to impose measures requiring appropriate regulatory adjustments by railway undertakings and railway station/stop operators through ex officio procedures and inspection supervisions. This will in the shortest period of time improve the system for the provision of adequate services to users/passengers. In passenger transport, HAKOM pays special attention to persons with disabilities and persons with reduced mobility and plans to propose improvements to accessibility in official places and in trains as part of the projects implemented with FEEC.

Undertakings and railway station/stop operators are obliged to provide all passengers with equal access to services, the remaining challenge being ensuring adequate provision of services to persons with disabilities and persons with reduced mobility. Therefore, additional efforts will be invested into assisting railway station/stop operators with the education of their employees, in particular the employees in everyday contact with passengers who need help. Since poor communication between railway undertakings and railway station/stop operators was observed in the previous period, and good communication is important in the situations when these two entities must act together, HAKOM will invest additional efforts into resolving this issue to the benefit of passengers. HAKOM will actively participate in the working groups dealing with regulations concerning rail passenger transport and in conferences. It will also organise conferences, especially those aimed at persons with disabilities. HAKOM will in 2024 continue to organise panels and round tables, thus promoting the importance of development of the rail services market and, consequently, rail transport markets, and it will mark the 15th anniversary of the rail services market regulation in July.

Inspection supervisions

In 2024, as an authority in charge of protecting passenger rights pursuant to the ARRSM and Regulation 2012/872 and rail services market pursuant to the RA, HAKOM will regularly control the conditions and accessibility of services in official places and in trains, paying special attention to the accessibility of services to persons with disabilities and persons with reduced mobility. Inspection supervisions will also verify the implementation of obligations of the infrastructure manager/service facility operator towards railway undertakings to resolve regulatory issues, especially regarding access to rail services and service facilities.

Aktivnosti na tržištu željezničkih usluga u 2024.					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
1.	Supervise the implementation of the 2024 Network Statement and all amendments	Control - Publish amendments to the Statement Regulatory compliance analysis	ongoing	N	2.1, 2.2, 4.2
2.	Supervise the implementation of the 2025 Network Statement and all amendments	Control - Publish amendments to the statement Regulatory compliance analysis	ongoing	N	2.1, 2.2, 4.2
3.	Supervise the preparation, publishing and implementation of the 2026 Network Statement	Control - Publish the draft - Publish the Statement Regulatory compliance analysis	ongoing	N	2.1, 2.2, 4.2
4.	Control of compliance of the service facilities descriptions with Regulation 2017/2177	Analysis of compliance with Regulation	ongoing	N	2.1, 2.2, 4.2
5.	Resolve regulatory disputes	Resolved cases	ongoing	N	2.1, 2.2, 4.2
6.	Keep the register of rail services of service facility operators	Register operational and updated	ongoing	N	4.2, 4.3
7.	Control charges for rail services	Charges comply with regulations	ongoing	N	4.2, 4.3

8.	Analysis of the calculation of charges for services provided in the service facilities of infrastructure managers.	Analysis prepared	IV	N	4.2, 4.3
9.	Analyse regulatory financial statements.	Report	ongoing	N	4.2, 4.3
10.	Supervise rail services market – transparent and non-discriminatory conditions for the provision of services	Non-discriminatory and transparent conditions of access to the network and service facilities	ongoing	N	4.3
11.	Carry out inspection supervisions in the area of rail services	Quarterly and annual data analysis Data disclosure	ongoing	N	4.3
12.	Collect and process data on the rail services market condition	Kvartalna i godišnja analiza podataka Objava podataka	Quarterly/ annually	N	4.3
13.	Resolve user disputes with railway undertakings	Resolved cases	ongoing	N	1.1, 1.2, 4.2, 4.3
14.	Carry out inspection supervisions in the area of passengers' rights protection	Supervision administrative acts published Annual report published	ongoing	N	1.1, 1.2, 4.2, 4.3
15.	Cooperation in the preparation of regulations in the area of the rail services market and rail passenger rights protection and harmonisation with EU regulations (Regulation 2012/782)	Analysis and proposals for improvement prepared	ongoing	N	4.1
16.	Reporting to the EC and MSTI in the framework of rail market supervision	Report	IV	N	4.3

05

RF spectrum management



The radiofrequency spectrum encompasses the 9 kHz to 275 GHz frequency band, used by different radiocommunication services: broadcasting, mobile service, fixed service, satellite service, radio astronomy, radio navigation, maritime and air traffic control services, etc. These services use the RF spectrum for numerous purposes, with different services often using the same frequency band for different purposes. In order to ensure a smooth operation of all existing networks and the introduction of new ones, the use of the RF spectrum needs to be carefully planned and coordinated both internationally and in the HR. The main changes and guidelines for the future application of the RF spectrum are expected after the World Radiocommunication Conference (WRC-23). Radiocommunications will still play an important role in many economic and social activities, in particular with regard to the development of the digital society. In the forthcoming EU digital decade it is expected that wireless broadband networks will make an even more significant contribution to the development of Industry 4.0 and the economy and that digital skills and business in the territory of the EU and the HR will be more available and enhanced.

Therefore, one of HAKOM's key tasks is the management of the RF spectrum as a naturally limited public good that needs to be managed rationally and responsibly to the benefit of the society. The RF spectrum is managed pursuant to the provisions of the ECA, in line with the principles of objectivity, transparency and non-discrimination, with the aim to ensure a stimulating environment for investments, innovation and competition.

Efficient management also requires daily, systematic control and supervision of the RF spectrum, measurements, the examinations and identification of the sources of interferences and the implementation of measures to eliminate them. For this purpose, a system of control and measuring centres and stations has been set up, which is continually upgraded and updated according to needs.

Regulatory activities

Following the closure of the World Radiocommunication Conference (WRC-23) and the adoption of new Radio Regulations, in 2024 HAKOM intends to implement them in the national regulations through the amendments to the Ordinance on the allocation of the radiofrequency spectrum.

Taking into account previous positive experiences and the practice of organising events with the aim of fostering the application and **promotion of new technologies**, such as the first 5G Day conferences on 5G mobile communications networks and the most recent G Day conference, held in 2023, at which topics were broadened from mobile communications networks to satellite communications, in 2024 HAKOM intends to organise a conference on similar topics involving the current issues of the application and availability of different technologies and services.

Participation in the work of the **5G network working group** and cooperation with market stakeholders will continue primarily in the segment related to electromagnetic fields (EMFs) and monitoring the 5G development and deployment in accordance with the [National Plan for Broadband Development in the Republic of Croatia 2021-2027](#).

In accordance with the obligations under the licences, licence holders have to provide HAKOM with data on the geographical location and technical data on the installed base station or changed data on the existing radio station, which includes data for each individual sector provided according to the pre-defined format before the start of operation. In addition, on a quarterly basis, the holders of licences also have the obligation to submit a georeferenced coverage map with the calculated values of signal levels, separately for each frequency band in which the individual technology is applied, according to the previously agreed format. Based on the submitted data and the sample of control measurements, HAKOM will **check the fulfilment of conditions and obligations from the licences issued for the RF spectrum use**.

In 2023, the [Agency for Electronic Media](#) (AEM) granted new concessions to broadcasters at the national and regional level for the digital radio broadcasting (DAB+) in the MUX1 multiplex. In 2024, the digital radio is expected to contribute to the development of the radio market and enable the accessibility of a large number of radio channels to listeners. Since the frequency band earmarked for the analogue FM radio (87.5-108 MHz) is very congested, it is precisely the possibility of introducing new programme contents that represents one of the principal advantages of the digital radio (DAB+) in the VHF III frequency band (174-240 MHz). HAKOM will continue the process of international harmonisation of the technical parameters of digital radio transmitters in order to ensure technical preconditions for its continued implementation. As there is no obligation to shut down the analogue FM radio, the speed and success of the digital radio implementation will primarily depend on the penetration of DAB+ receivers, user interest in new radio content and the interest of existing and future broadcasters in providing new content via the DAB+ platform. Depending on market interest, HAKOM will announce and conduct public tenders to issue licences for the new digital radio multiplexes on the national and/or regional levels as well as for the two remaining digital television multiplexes (DVB-T2). HAKOM will continue ensuring technical parameters for concessions for the provision of FM radio services in accordance with the requests of broadcasters and the AEM.

HAKOM will continue with activities related to the assignment of frequency resources for the national coverage in the **stationary satellite service** on the geostationary orbital position 63° E, with regard to the procedure initiated with the assistance of the ITU-R in 2021. Depending on the results of the World Radiocommunication Conference (WRC-23), at which the provisions of the ITU Radio Regulations are expected to be amended in order to facilitate the coordination process with other

satellite networks, in 2024 HAKOM will begin coordination of the above satellite network for the purpose of subscription to the FSS Plan.

By employing modern IT tools and systems, HAKOM constantly improves its operation ensuring faster and easier access to its services for the users of the RF spectrum and provides information falling within its competence. Within the e-Agency programme and the use of the RF spectrum, from mid-2023 [e-Licence](#) services are available for all types of licences for the use of the RF spectrum that are issued on request. The system will be upgraded, upon need.

In addition to the already implemented e-signature service, the sending and receiving of licences in electronic form, in 2024, HAKOM will also ensure the availability of the insight for users into licences in electronic form by means of electronic channels, such as the personal user mailbox, business user mailbox or the [E-citizens](#) system. In addition to the licensing applications, there is also the application for an overview of licences (*Pregled dozvola*), which enables an overview of issued licences for the use of the RF spectrum, in general and individually, which will be updated as appropriate.

In 2024, international activities for the removal of interferences in the FM and VHF III (DAB) frequency band will be continued. This particularly concerns the activities of the RSPG Working Sub-group on cross-border coordination (Good Offices) operating within the advisory RF Spectrum Policy Group of the European Commission (RSPG) as, in November 2022, HAKOM submitted a request to the RSPG to use its good offices and issue an opinion proposing a coordinated solution to the Italian Republic regarding cross-border harmful interferences. HAKOM will also participate in international meetings, report on the status of interferences and seek further involvement of the competent bodies of the International Telecommunication Union (ITU), the Radio Regulations Board (RRB) and the Director of the Radiocommunication Bureau (BR) in resolving the problem of interferences in the segment of terrestrial broadcasting.

EMF level verification

The protection from radio communications electromagnetic fields (EMFs) in the areas of increased sensitivity has become HAKOM's regular activity. Data on base stations will be regularly checked in addition to the required calculations and, where necessary, measurements of the level of EMFs will be conducted on the ground. Control **measurements of the EMF levels of base stations and other radio stations** will be published on HAKOM's [GIS portal](#).

Through activities aimed at the control of the EMF levels of radio stations, which, where necessary, include preventive or corrective measures, HAKOM ensures compliance of the construction of ra-

dio stations with regulations in the field of electronic communications. These activities also indirectly ensure compliance with health care regulations governing EMF protection.

Spectrum control

One of HAKOM's key roles is to ensure the use of the RF spectrum in compliance with issued (valid) licences and to protect the holders of licences for the RF spectrum use. Accordingly, HAKOM regularly **controls and monitors the RF spectrum**, which includes daily, weekly and monthly measurements and different measuring campaigns. Measurements are carried out by a sophisticated measuring system consisting of multiple control and measuring centres, control and measuring stations, measuring vehicles and manual measuring devices. All measurements are conducted in accordance with clearly defined procedures complying with applicable norms, regulations and recommendations. The results obtained also serve as the basis for further planning and coordination of the RF spectrum. Within the framework of **protection from interferences**, special attention will be awarded to the services competent for search and rescue, emergency services, maritime and air traffic control radio communications that play an important role in protecting human lives and property as well as to operators of mobile electronic communications.

Measuring campaign – Italian interference: From July to September, every year comprehensive measurement activities are undertaken to protect Croatian radio (FM and T-DAB+) and television (DVB-T/T2) networks from interference originating from the Italian Republic in VHF and UHF frequency segments. Following the measurements, the obtained results will be processed and interferences will be reported to the Italian administration and the International Telecommunication Union (ITU) in order to ensure uninterrupted use.

Measuring campaign – WAS/RLAN in the 5 GHz frequency band: The campaign is aimed at ensuring an efficient and effective operation of meteorological radars within the 5470–5725 MHz frequency band (in the following order: RC Gradište kod Županje, RC Bilogora, RC Debeljak – Sukošan, RC Goli, RC Uljenje and RC Puntijarka) and share it with WAS/RLAN devices. WAS/RLAN devices use the RF spectrum based on general licence OD-201. Targeted checks of the use of the 5 GHz frequency band, the compliance of the operation of WAS/RLAN devices with the provisions laid down in the general licence and the removal of unwanted interferences with the operation of meteorological radars are planned in 2024. With regard to the importance of the base of reported WAS/RLAN radio stations in the so far conducted activities related to the removal of interferences with the operation of meteorological radars within this band, HAKOM will continue to improve the application for reporting user RLAN devices and promote its use. The objective of the measurement is primarily to enable undisturbed implementation and use of new meteorological radars in the 5 GHz frequency band.

Measuring campaign – the verification of coverage and measuring key performance indicators of mobile telecommunications networks: In order to meet the transparency obligations under the TSM Regulation relating to the speed of internet access in mobile telecommunications networks, a measuring operation will be carried out aiming at verifying data on the coverage of mobile networks supplied by mobile telecommunications network operators. In addition to the verification of the coverage of mobile telecommunications networks, a detailed measurement of key performance indicators of mobile telecommunications network operators will be carried out. The operation will be carried out on an ongoing basis in order to regularly refresh data processed within the framework of the comparison of submitted coverage maps. HAKOM will publish data on its website submitted by operators within the framework of comparable coverage maps, as well as data on the quality of data and voice services.

Control and measuring system

The maintenance of the control and measuring system is crucial for an efficient RF spectrum management because it uses measurements that enable the control of the RF spectrum. The system needs to be regularly maintained and upgraded to keep up with the latest technologies in the area of electronic communications.

Regular measuring system maintenance activities include: agreements on maintenance, repairs, development, upgrades and calibration of measuring equipment and system software support; repairs, maintenance and procurement of communications equipment for linking of the control and measuring system as well as its leasing, routine checks and certification of anti-theft and fire alarm systems. Antenna poles also need maintenance, which includes painting, verification of verticality and grounding. In addition to all of the above, works related to facilities management and detailed annual checks of control and measuring centres, control and measuring stations and measuring vehicles are carried out. The calibration of measuring instruments will be carried out in accordance with the regular calibration plan.

Inspection supervisions

Inspection supervision is performed after irregularities or divergences from the conditions laid down in the licences for the RF spectrum use are established through measurements. At the same time, there is an ongoing supervision of the radio equipment put on the market and/or in operation (use) pursuant to the Law on Technical Requirements for Products and Conformity Assessment and [Directive 2014/53/EU](#) (Radio Equipment Ordinance).

ongoing					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/ Priority
1.	Verify the meeting of conditions from licences for public mobile communication networks	RF spectrum use in accordance with licences	IV	N	2.3
2.	Head and organise the 5G working group	Working group meetings and required documents	ongoing	N, 329	4.2
3.	Organise an event (conference) to promote new technologies	G Day Conference	II	N, 329, 3233	1.1
4.	Harmonise RF spectrum internationally	Implementing agreements on spectrum use with neighbouring countries and individual radio stations harmonised	ongoing	N	2.3
5.	Amend the Ordinance on RF spectrum use and RF spectrum allocation plans	Ordinance on RF spectrum use and allocation plans ready for adoption in accordance with international regulations, interest shown and market and technology development	III	N	3.2
6.	Issue compliance certificates	Certificates for radio stations that comply with conditions	ongoing	N	4.2
7.	Issue licences for the RF spectrum use pursuant to submitted applications	HAKOM's administrative acts	ongoing	N	2.3
8.	Prepare calculations and issue annual invoices for the RF spectrum use for valid licences	Annual invoices for the RF spectrum use	ongoing	N	2.3

9.	Plan and optimise radiocommunication networks	Efficient use of RF spectrum: Improved coverage of existing networks Conditions for operation of new networks ensured	ongoing	N	2.3
10.	Control radiofrequency spectrum regularly	Measurement reports on conducted measurements	ongoing	N	2.3
11.	Resolve international interferences	International meetings International interferences requiring additional communication removed	ongoing	N	4.2
12.	Resolve domestic interferences	Domestic interferences removed	ongoing	N	2.3
13.	Implement Measuring campaign — Italian interference	Measurement report Reports for the removal of interferences	III-IV	N	4.2
14.	Control the levels of electromagnetic fields (EMFs)	GIS browser of radio stations and EMF measurements Measurement reports	ongoing	N	4.2
15.	Implement Measuring operation – WAS/RLAN in the 5 GHz frequency band	Detailed measurement reports	ongoing	N	2.3
16.	Implement Measuring operation – verification of coverage and measuring of key performance indicators of mobile telecommunications networks	Detailed measurement reports	ongoing	N	2.3
17.	Maintain control and measuring system	New measuring equipment Measuring equipment calibrated	ongoing	N, 422, 3232	2.3
18.	Perform inspection supervisions	Supervision administrative acts	ongoing	N	4.2

06

**Development programmes
and the Broadband
Competence Office (BCO)**



HAKOM's activities as the Broadband Competence Office (BCO) will continue in 2024 by informing citizens and business entities about broadband access. It will primarily be done through the regularly updated website, as well as other forms of communication, such as workshops, presentations and meetings with interested user groups or by participation in events related to broadband access.

The BCO's role is to identify and eliminate market failures affecting broadband coverage with the aim of its further development. The BCO is responsible for connecting different user groups, information and consultation, promoting the use of financial instruments as well as the implementing and monitoring of national plans and strategies related to broadband access. Through its activity, the BCO fosters the development of very high capacity networks (VHCN), which also includes 5G/NR networks, and stimulates the use of new services available via VHCN networks.

Monitoring the implementation of the [Framework National Programme for the Development of Broadband Infrastructure in Areas Lacking Sufficient Commercial Interest for Investments](#) (FNP) in 2024 will cover the completion of the implementation of twenty projects initiated in the financial period 2014 – 2020 and new projects for which funds have been ensured under the [National Recovery and Resilience Plan](#) (NRRP) – Measure C2.3 R4-1I. With regard to the closure of projects related to the financial period 2014 to 2020, the final report on the FNP implementation will be prepared for the European Commission.

HAKOM as the Competent Authority for the Framework Programme (CAFP) coordinates the implementation of projects and cooperation with other authorities within the system, in particular Intermediate Bodies levels 1 and 2 – [the Ministry of Regional Development and EU Funds](#) (MRDEF) and the [Central Finance and Contracting Agency](#) (CFCA). Within the framework of its competences, HAKOM cooperates intensively with the MSTI, which is the competent authority for the allocation of grants for projects financed under the NRRP for the implementation of investments. The CAFP will publish the information on activities related to the FNP and NRRP implementation at <https://nop.hakom.hr/>.

HAKOM's planned activities related to development programmes and the BCO in 2024 are presented in the table below.

Activities of development programmes and the BCO in 2024					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/ Priority
1.	Cooperate with ministries, agencies and business entities with regard to FNP and NRRP implementation (MRDEF, MSTI, CFCA, operators)	Activities related to FNP and NRRP implementation carried out	Kontinuirano	N	3.2.

2.	Participate in the work of the Operational Programme Competitiveness and Cohesion (OPCC) Monitoring Committee	Participation in the Committee meetings Monitoring progress in achieving specific OPCC objectives	ongoing	N, 3233	4.2
3.	Monitor the implementation of measure C2.3 R4-1I from the NRRP	Written reports on NRRP of implementation	quarterly	N	3.3
4.	Monitor the implementation of operators' commercial interests	Report on the implementation of the commercial interests of operators	quarterly	N,	3.3
5.	Inform the European Commission on the implementation of the FNP and measure C2.3 R4-1I from the NRRP	Report on the implementation of the FNP and the NRRP	IV	N	5.1
6.	Carry out activities of the Broadband Competence Office (BCO)	Content of the BCO website regularly updated and relevant Coordination of bodies included in BCO activities	ongoing	N	3.1, 3.2 3.3, 4.2
7.	Consult and inform the public and interested stakeholders with regard to broadband access development	Consultation conducted and information provided Workshops held	ongoing	N	3.3
8.	Cooperate with stakeholders with regard to broadband development	Cooperation realised Work in expert groups Meetings	ongoing	N 3237	3.3
9.	Cooperate with international bodies and participate in meetings of the European BCO Network and in the work of other international groups	Cooperation realised and the level of expertise raised Meetings	ongoing	N 3237	3.3, 5.2

07

**HAKOM'S
other activities**



Regulatory framework

In 2024, HAKOM will actively monitor the changes in the EU legislation in the electronic communications, postal and rail services markets. The proposals of regulations will be analysed from the perspective of the interests of the HR market stakeholders and the results of the analysis will be embedded in the proposals of the positions adopted by the Government of the HR based on which further negotiations in the legislative procedure are conducted. HAKOM will harmonise the proposals of the positions with other public authorities within the EU coordination mechanism, set up by the Government of the HR. HAKOM is currently actively participating in the preparation of positions on the Regulation on measures to reduce the cost of deploying gigabit electronic communications networks (Gigabit Infrastructure Act, GIA). If the above regulation is adopted in the course of the year, HAKOM will begin activities on its implementation.

HAKOM will continue its cooperation with competent ministries with regard to the transposition of the acquis. At this moment, it is known that HAKOM will participate in the work of the expert group for the preparation of the Draft Proposal of the Act on the Implementation of [Regulation \(EU\) 2022/2065](#) on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act). In accordance with the above mentioned regulation, by 17 February 2024 the HR must designate a body that will carry out the function of the Digital Services Coordinator. According to the initial plan of the expert authority responsible for preparing the Draft Proposal of the Act, it is envisaged that HAKOM should play this role. For this purpose, in parallel with the drafting of the Act, HAKOM will undertake organisational and staff preparations in order to assume this function once the Act is adopted.

HAKOM will regularly monitor the implementation of subordinate legislation falling within its competence and, if appropriate, adopt amendments to such legislation to harmonise it with market needs.

BEREC Chairmanship

In 2024, the Chairman of the HAKOM Council will be BEREC Chair. For HAKOM, this duty includes running the meetings of the Contact Network and plenary sessions of the Board of Regulators and coordinating the work of BEREC working groups and the responsibility for meeting BEREC Work Programme 2024 as well as representing BEREC in relations with relevant market stakeholders and organisations. In addition to the duties of the BEREC Chair, HAKOM will also co-chair two BEREC's working groups with an additional involvement in others, so that the work within BEREC will be intensified and demanding throughout the year.

Cooperation

Internationally, HAKOM cooperates with different organisations and participates in the activities of working groups in order to face regulatory challenges and promote the application of European regulatory frameworks. Thus, HAKOM participates in the international networks of EU regulators: BEREC, IRG Rail, ERGP; EU committees, such as the RSC, COCOM, CEF Coordination Committee, PDC, as well as expert working groups, such as the RSPG, HLIQ, EG112, SERAF and ENRRB. Within the EU, HAKOM is also active in the ADCO RED, NEB and NIS groups and also cooperates with the ENISA. In addition to these organisations and bodies, HAKOM is also active as the HR representative in the ITU and CEPT, in which the work in the following expert groups and teams is particularly noteworthy: WGFM, FM22, FM44, SRD/MG, WGSE, SE19, SE21, SE45, HCM, WG NaN, CPG and project teams, and CERP as well as the Governmental Advisory Committee (GAC) at the ICANN. Through these activities HAKOM shares information, participates in the adoption of decisions and contributes to the development of common European positions while protecting Croatian interests. Cooperation with international bodies and organisations is important for the harmonisation of regulatory frameworks and promotion of the development of the telecommunication sector in Croatia.

Within the framework of domestic cooperation, HAKOM will continue cooperation with ministries and other public authorities, the stakeholders in the markets falling within its competence, the representatives of consumers from civil society organisations, members of the academia and any interested parties whose initiatives coincide with HAKOM's mission and vision.

Regulatory impact assessment

In 2023, HAKOM completed the project for the implementation of regulatory impact assessment (RIA). The project was launched in January 2022 as part of the project *Strengthening the capacity for the implementation of regulatory impact assessment in Croatia* that also included the Legislation Office of the Government of the Republic of Croatia. The project was implemented by the German Corporation for International Cooperation (Gesellschaft für Internationale Zusammenarbeit (GIZ)) in cooperation with the Directorate-General for Structural Reform Support of the European Commission (DG REFORM). The project was commissioned by the German Federal Ministry of Economic Affairs and Energy and co-financed by the EU under the Technical Support Instrument (TSI).

All activities in the tables marked by an * next to the ordinal number will be implemented based on HAKOM's regulatory impact assessment methodology, but this does not limit the implementation of RIA in other activities if the need arises.

Publicity of operations and access to information

In accordance with HAKOM's strategy, transparency is one of the organisation's three core values. Therefore, in addition to public access to legally prescribed procedures, attention is also paid to disclosing any other information important to end-users or business entities, primarily on the internet: the publishing of news, advice and warnings (including through social media), with the possibility of a daily telephone contact for users or contacts via other electronic means (the [Ask Us](#) application, [e-mail](#), social networks).

In 2024, HAKOM's website in Croatian and in English will be regularly updated with current contents, and public information and advice will also be distributed through other digital platforms, such as Facebook, Twitter, LinkedIn or YouTube. HAKOM will publish information relevant for its work and organisation regularly, in particular the information impacting user interests. HAKOM will also provide any information that may help users or facilitate the use of services in each of the three markets falling within HAKOM's competence.

HAKOM, as a public authority, enables the users to exercise the right of information access and the re-use of information by submitting oral or written requests in accordance with the provisions of the [Act on the Right of Access to Information](#). Information access is enabled by the timely publishing of information on HAKOM's activities on HAKOM's official website and by providing information based on submitted requests. In this way, HAKOM will fulfil the principle of transparency and publicity of its operations as well as the timeliness, completeness and accuracy of information published.

Inspection activities

Inspection powers ensure a better and timely reaction in market regulation and HAKOM will continue to conduct inspection supervisions and market controls according to the inspection's Annual Work Programme, including if any deficiencies are observed in all the markets falling within HAKOM's competence. The focus of inspection supervisions in 2024 will primarily be placed on compliance with regulatory obligations, the enabling of the universal service, the protection of users' rights, the quality and safety of communication networks, the conformity of radio equipment, the efficient use of the radiofrequency spectrum, network neutrality, the prevention of unwanted electronic communications, the timely payment of right of way fees to real estate owners, the control of switching operators and number porting processes, the fulfilment of obligations of the universal service provider, the fulfilment of obligations of postal services providers, the protection of pa-

ssengers' rights in rail passenger transport, supervisions in the rail services market with the aim of addressing regulatory issues and access to rail services and service facilities. All cases which, due to the violations of laws or non-compliance with certain provisions, pose a threat of a negative impact on a large number of users will be considered a priority, irrespective of previously planned inspection supervisions or investigations. Inspection supervision administrative acts will be published after the procedure is completed. The report on inspection supervision procedures carried out in 2023 will also be published in the course of the year.

Proportionality of inspection supervisions will be achieved by choosing measures depending on the nature of the divergence from legislation, taking into account the complexity and abundance of regulations and rules that subjects in the market have to comply with. Offenders will thus primarily be ordered to undertake measures necessary for the elimination of unlawful conduct, once such a conduct is established. Misdemeanour prosecution will be undertaken in accordance with legal powers, taking into account all the merits of the case.

The adequacy of inspection supervision will, as a rule, be achieved by eliminating systemic problems in the market that may considerably undermine competition or end-users' rights.

Inspection supervisions will be carried out by HAKOM's inspectors and, according to need and the scope of the procedure, with the participation of experts in specific areas and lawyers assigned to inspectors in a specific case of inspection supervision.

Court proceedings

Court proceedings in which HAKOM will participate as a party in the proceedings will include administrative disputes initiated against HAKOM's final decisions, misdemeanour proceedings initiated by HAKOM against natural and legal persons due to the non-compliance with legislative provisions falling within HAKOM's competence, debt collection procedures against legal and natural persons for the failure to settle fees for the right of use (state budget) and for HAKOM's work, and pre-bankruptcy and bankruptcy proceedings where HAKOM applies for its claims against a debtor upon whom pre-bankruptcy or bankruptcy proceedings have been initiated.

Competence development and business processes improvement

HAKOM fosters an engaging organisational culture directed at operational and business excellence. In order to achieve larger efficiency, a project was launched for the development of a stimulating **organisational culture** promoting specific results. In 2024, the project will reach its final phase. Through a series of initiatives, employees will be encouraged to take responsibility and develop a business culture that appreciates and recognises good quality work and exceptional achievements.

Since in 2023 the catalogue of general and specific competences was defined for all activities currently carried out by HAKOM, in 2024, a systematic and targeted **development of competences** will continue, which are required for a successful work. Through targeted development, employees will be capable of responding to the existing and future challenges.

In the past three years HAKOM developed and set up the **business process management** methodology. Work on recognising, modelling and designing new processes as well as on the analysis of the existing ones will continue in 2024, with the aim of further improvements and higher productivity. The optimisation and digitalisation of operations has been constantly implemented, which includes the improvement of the existing processes or the introduction of the new ones.

The initial internal assessment of the quality system was conducted according to the quality management methodology, which includes the principles, models and requirements for the quality management system of the organisation as well as the criteria for the service quality assessment. In 2024, HAKOM will also continue with a further implementation of the internal quality system assessment based on the Common Assessment Framework and, for the purpose of a further improvement of the quality system, implement improvements of the quality system in the areas identified by the assessment. This is a model of complete quality management through self-assessment, which is the guiding principle for the management in finding the paths to excellence. It is based on the assumption that excellent results in organisational performance, relations with citizens/users, human resources and impact on the society are achieved based on the principle of leadership directed at strategies and planning, employees, partnerships, resources and processes. Therefore, the assessment is conducted in the above areas.

In accordance with operations based on agile work principles and the quality of services as the business priority, HAKOM will continue to identify possibilities for further improvements in operations and readiness for change focusing on service users' satisfaction.

e-Agency

The development of external user-oriented services within the e-Agency programme will continue with the aim of improving, enhancing and modernising the current business processes at HAKOM. In addition to the introduction of office management in accordance with regulations, it is also necessary to introduce and implement new internal processes and systems as well as to improve the current services. For this reason, **new functionalities** will be integrated in the **office management programmes** to achieve higher efficiency and better monitoring of business organisation processes.

HAKOM has already implemented the e-signature service. In 2023, the new system for sending requests and receiving licences in electronic form was also implemented for all types of licences for the RF spectrum use that are issued at request.

In 2024, HAKOM will ensure the insight for users into licences in electronic form by means of electronic channels, such as the personal user mailbox, business user mailbox or the e-Citizens system, which, in addition to other e-services, will further contribute to the enhancement of services provided by HAKOM.

In building the e-Agency, HAKOM carries out a series of activities and measures with the aim to increase cybersecurity and reliability of its external and internal services, aiming to provide a good quality response to the growing security threats in the cyberspace. Education is frequently carried out within the organisation and employee awareness is raised about the importance of cybersecurity. The condition of the cybersecurity of HAKOM's own information system is checked occasionally.

With the aim of enhancing its organisational and financial efficiency, in 2024, HAKOM will complete the implementation of the **new ERP system**, which also includes the integration of a new accounting programme. It is expected to achieve a more efficient posting and financial reporting process and result in improved employee performance and a more efficient financial management and control.

With the goal of a complete digitalisation of operations, HAKOM will implement the functionalities of the **digital archiving of cases**, which will contribute to financial savings as well as saving time and paper.

The table below presents HAKOM's other activities planned for 2024. The table includes a reference to the expenditure accounts in the Financial Plan for each of the activities (a list of all expenditure accounts is included at the end of the document) and a reference to the strategic goal the realisation of which is assisted by the execution of a specific activity.

Other HAKOM's activities in 2024					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
1.	Prepare a report on the implementation of the Annual Inspection Plan for 2023	Report on the implementation of the Annual Inspection Plan for 2023	ongoing	N	4.2
2.	Coordinate the implementation of the Annual Inspection Plan for 2024	Implementation according to the Annual Plan and identified current needs	ongoing	N, 3237	4.2
3.	Draft the Annual Inspection Plan for 2025	Annual Inspection Plan for 2025	ongoing	N, 3237	2.1
4.	Prepare the annual report and the financial statement for 2023 and submit them to the Croatian Parliament	Annual report and financial statement for 2023	ongoing	N, 3237	5.1
5.	Prepare the annual work programme and the financial plan for 2025	Annual work programme and the financial plan for 2025	II	N	5.1
6.	Analyse and harmonise business processes	All processes that were subject to change analysed and harmonised	IV	N	5.1
7.	Manage projects	Projects comply with established project methodology	IV	N	5.1
8.	Update web and intranet sites and other digital communication platforms	Relevant and timely information for the public	ongoing	N, 3238	5.1
9.	Develop and maintain e-Agency services	New e-Agency services added and existing ones upgraded	ongoing	N, 3238, 454	5.1, 5.2

10.	Analyse and monitor the implementation of HAKOM's Strategy for the period from 2022 to 2025	Report on the implementation of the Strategy and guidelines for the preparation of the strategy for the next period	ongoing	N	5.1, 5.2
11.	Develop organisational culture	Stimulating organisational culture	ongoing	N	5.2
12.	Develop competences	New competences	IV	N	5.3
13.	Implement the internal quality system assessment	Areas for improvement identified	II	N	5.1, 5.2
14.	Monitor the regulatory framework	Areas for improvement identified	IV	N	4.1

ANNEXES

Description of accounts used in references

ACCOUNT	DESCRIPTION	PROPOSAL OF * THE PLAN FOR 2024
		16,114,700
31	Employee expenses	8,513,800
311	Salaries	6,398,400
312	Other employee expenses	1,044,800
313	Contributions on salaries	1,070,600
32	Material expenditure	5,805,900
321	Compensations of expenses to employees	674,800
322	Expenditures for materials and energy	581,400
323	Expenditure for services	4,288,300
	<i>3231 – Telephone, postal and transport services</i>	178,000
	<i>3232 – Current and investment maintenance services</i>	410,200
	<i>3233 – Marketing and informing services</i>	150,000
	<i>3234 – Utility services</i>	75,000
	<i>3235 – Renting and leasing</i>	1,299,300
	<i>3236 – Health and veterinary services</i>	71,900
	<i>3237 – Intellectual and personal services</i>	961,600
	<i>3238 – Computer services</i>	741,500
	<i>3239 – Other services</i>	400,800
324	Compensation of expenses to unemployed persons	700
329	Other unmentioned operating expenditure	260,700
34	Financial expenditure	15,400
343	Other financial expenditure	15,400
38	Other expenditure	8,000
383	Fines, penalties and damages	8,000
41	Expenditure on the acquisition of non-produced long-term assets	101,800
412	Intangible assets	101,800
42	Expenditure on the acquisition of produced long-term assets	1,233,400
422	Plant and equipment	785,800
426	Intangible produced assets	447,600
45	Expenses for additional investments on non-financial assets	436,400
452	Additional investments in plant and equipment	22,000
454	Additional investments in other non-financial assets	414,400

* The amounts in the table refer to the Financial Plan at the time of the adoption of the Annual Work Programme and may deviate in the case of revision.

The abbreviation “N” includes 31 – Employee expenses, 321 – Compensations of expenses to employees, 322 – Expenditures for materials and energy, 3231 – Telephone, postal and transport services, 324 – Compensation of expenses to unemployed persons, 329 – Other unmentioned operating expenditure.

The Financial Plan for 2024 is available at [HAKOM website](#).

ABBREVIATIONS

CCA – Croatian Competition Agency
BCO – Broadband Competence Office
BEREC – Body of European Regulators for Electronic Communications
CADPN – Central Administrative Database of Ported Numbers
CEPT – European Conference of Postal and Telecommunications Administrations
CERP – European Committee for Postal Regulation
CNB – Cental National Bank
COCOM – Communications Committee
DAB – Digital Audio Broadcasting
SGA – State Geodetic Administration
DVB-T2 – Digital Video Broadcasting – Terrestrial2
CBS – Croatian Bureau of Statistics
EC – European Commission
ECI – Electronic Communications Infrastructure
EMF – electromagnetic field
ENISA – European Network and Information Security Agency
ENRRB – European Network of Rail Regulatory Bodies

ERP – Enterprise Resource Planning
ERGP – European Regulators Group for Postal Services
EU – European Union
FM – Frequency Modulation
GIS – geographic information system
HAKOM – Croatian Regulatory Authority for Network Industries
HP – Hrvatska pošta d.d.
ICANN – Internet Corporation for Assigned Names and Numbers
IRG-Rail – Independent Regulators Group – Rail
ITU – International Telecommunication Union
ITU-R – International Telecommunication Union – Radiocommunications
MESD – Ministry of Economy and Sustainable Development
MTI – Ministry of the Sea, Transport and Infrastructure
MRDEF – Ministry of Regional Development and EU Funds
MST – Margin Squeeze Test
MVNO – Mobile Virtual Network Operator
M2M – Machine to Machine
NCERT – National Computer Emergency Response Team
NEB – National Enforcement Body (national authority for the enforcement of regulations on the rights of passengers in rail transport)
NIS – Network and Information Security
CAFP – Competent Authority for the Framework Programme (for the development of broadband internet access)
FNP – Framework National Programme (for the development of broadband internet access)
OPCC – Operational Programme Competitiveness and Cohesion
RF – Radiofrequency
RFS – Regulatory Financial Statement
RIA – Regulatory Impact Assessment
RSC – Radio Spectrum Committee
RSPG – Radio Spectrum Policy Group
HR – Republic of Croatia
CFCA – Central Finance and Contracting Agency

SMP – Significant Market Power operator
UPU – Universal Postal Union
UHF – Ultra High Frequency: radiofrequency band spread in the range between 30 MHz and 300 MHz
VHCN – Very High Capacity Network
VHF – Very High Frequency – electromagnetic waves in the radiofrequency band from 30 MHz to 300 MHz
WACC – Weighted Average Cost of Capital (for reasonable rates of return on invested capital)
WAS/RLAN – Wireless Access System/Radio Local Area Network
WLAN – Wireless Local Area Network
ECA – Electronic Communications Act
PSA – Postal Services Act
RA – Railway Act
ARRSM – Act on the Regulation of Rail Services Market and the Protection of Passenger Rights in Rail Transport

