

2025 ANNUAL WORK PROGRAMME



**CROATIAN REGULATORY AUTHORITY
FOR NETWORK INDUSTRIES**

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Introduction

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

- 1 Ensuring the high quality of services and their accessibility to users
- 2 Ensuring efficient market competition
- 3 Fostering innovations and efficient network investments
- 4 Bringing the work of all market stakeholders into compliance with the regulatory framework
- 5 Achieving business and operational excellence

Most of the tasks and operations are performed under public powers pursuant to sectoral regulations. These primarily include the [Electronic Communications Act \(ECA\)](#), [Act on Measures to Reduce the Cost of Deploying High-speed Electronic Communications Networks](#), [Cybersecurity Act \(CA\)](#), [Digital Services Act \(DSA\)](#), [Gigabit Infrastructure Act \(GIA\)](#), [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 a basis for the planned activities, are defined by the regulatory frameworks of the European Union (EU) and the Republic of Croatia (HR) and are strategically attuned to HAKOM's mission and vision.

HAKOM's mission

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 market, HAKOM regulates electronic communications markets as well as postal services and rail services markets in the interest of service users.

HAKOM's vision

Developing sustainable network services markets in which competition is enabled by a wide range of high-quality services accessible to all citizens.

In 2025, HAKOM will continue to develop as an agile public authority, standing ready to respond to challenges and quick changes. Teamwork remains key for HAKOM due to a highly interdisciplinary nature of the regulation of the network services market, involving a combination of technical, economic and legal expertise. The protection of market competition and the creation of conditions for the further development of each of the three markets will form a backbone of HAKOM's regulatory activity, while inspection powers will ensure compliance with regulations or HAKOM's decisions, guaranteeing a quick response to market irregularities, if detected. The high level of protection of users (passengers), a strategic priority, is planned to be achieved by preventive and corrective actions, encompassing the resolution of disputes between users and service providers in network industries as well as a regular analysis of various service providers' complaint systems. Special attention will be paid to strengthening HAKOM's professional capacities, so as it can exercise its new powers gained under the Cybersecurity Act and the decision of the Government of the Republic of Croatia appointing HAKOM as Digital Services Coordinator pursuant to the Digital Services Act. The regulatory impact assessment (RIA) will be undertaken for all important regulatory decisions.

In order to constantly improve the quality of its work and achieve its strategic priorities, HAKOM will continue to implement the best European regulatory practices, directing its efforts towards the development of sustainable network services markets to the benefit of all citizens of the Republic of Croatia.

Electronic communications

The electronic communications of the Republic of Croatia comply with EU policies, with HAKOM, as a regulatory authority, making sure that these policies are consistently implemented. The EU is currently focused on the following: the development and deployment of 5G networks and very high capacity networks (VHCNs) with gigabit access speeds, with the regulatory support provided by the Gigabit Infrastructure Act (GIA), cybersecurity, with an emphasis on the protection of critical infrastructure and data, and digital inclusion, which ensures that all citizens, including those living in rural and underdeveloped areas, have access to high-quality internet services, as well as on data use regulation and sustainable digital transformation, focused on reducing the ICT sector's digital footprint by promoting energetically efficient solutions and recycling electronic waste.

The regulation of the electronic communications market at present mainly involves the regulation of the networks and infrastructure (wholesale conditions for access to the infrastructure, network and associated facilities of the operator). The convergence of electronic communications services (ECS) and digital services (information society services) has already happened, as best shown by the virtualisation and cloudification of electronic networks, with end-users concurrently using traditional electronic communications services and number-independent services (mostly OTT services). These developments have an effect on HAKOM's regulatory role, as the regulation of market competition has been supplemented by new powers due to the convergence of electronic communications and the digital market.

Market competition

One of HAKOM's main strategic priorities is to ensure market competition, because fair and transparent market conditions encourage innovations and result in improved services offered to users. This is ensured, among other things, by market analyses and relevant decisions, based on the current EU regulatory framework.

The analysis of the market for wholesale dedicated capacity (M2/2020) and the analysis of the market for wholesale trunk segments of leased lines – non-competitive relations (M14/2003) will be completed in the first half of 2025. These analyses involve a detailed geographic analysis, which may result in the geographic segmentation of the market or the segmentation of regulatory measures. The analyses were planned to be completed in 2024, but given the complexity and specific nature of services provided in these markets, and data available to operators, the geographic analysis of the markets and the assessment of competitive conditions took more time than planned. After the adoption of decisions on the analyses of these two relevant markets, HAKOM will implement the activities necessary for the adjustment with the conclusions of the analyses.

The analysis of the market for wholesale local access provided at a fixed location (M1/2020) and the analysis of the market for wholesale central access provided at a fixed location for mass-market products (M3b/2014), conducted in July 2023, defined the geographic segmentation of the markets for high-capacity services based on the selected criteria for establishing competitive conditions in specific geographic units (communities/cities/City of Zagreb districts), with the result that a part of the HR territory was deregulated. The said decisions prescribe that, after a two-year period, **the status of the geographic units will be verified** to establish whether their status of competitive/non-competitive areas has changed. A revision of these areas will therefore be carried out in 2025 and their new statuses will be defined pursuant to a decision. Based on this decision, HT's status of a regulator with significant market power in the geographic units whose status will have changed will be revised and the obligations defined by the analyses of relevant markets will be repealed and/or imposed. The decision will be

adopted in accordance with the results of the regulatory impact assessment, which will be accompanied by the procedure of public consultation and the notification of the European Commission (EC).

Based on the mentioned analyses of relevant markets HT was imposed an obligation to introduce the Equivalence of Input (EoI) model in the non-competitive areas of the high capacity market. The aim of the EoI is for HT to provide each operator with the same processes, information and information systems necessary for the implementation of these processes as well as with the deadlines, conditions and service prices equal to those of HT's retail services. The manner of the implementation of this obligation was established in 2024, so that the activities related to **the supervision of the implementation of the EoI** will be carried out in 2025.

In early 2024 HAKOM lunched a procedure to amend the methodology of **the margin squeeze test (MST)** for all HT's retail offers in the broadband access market. The amendments to the methodology take into account conditions in the markets established by the decisions on the analyses of wholesale broadband access markets from July 2023. The methodology comes into force in the last quarter of 2024, with the MST tools to be adjusted to the defined methodological principles. As of 2025 all new and existing offers will be tested according to the new methodology and the offers that do not satisfy the test will have to be withdrawn.

In 2025, in order to more efficiently monitor retail price developments, HAKOM will define an adequate methodology and start to carry out **an analysis of retail prices**, taking into account the relevant guidelines of BEREC¹, which define the bundles of broadband access services, and will, if necessary, start to collect data on additional service bundles. HAKOM will start to collect the required data on the tariffs and prices of retail services from operators in a structured electronic form.

As regards the assignment of RF spectrum licences and the obligation of enabling access to the MVNO network, HAKOM will monitor and supervise operators in terms of whether they meet all the obligations imposed on them under RF spectrum licences and whether access to the network has been provided under the conditions that enable efficient market competition and the development of new services for end-users. In order to assess whether MVNO access offers enable operators that have no mobile communications networks of their own to enter the market and to compete on equal terms with operators offering bundles of fixed and mobile services, HAKOM has launched a project of designing **a model for the assessment of economic replicability of retail offers of the mobile network operator by MVNO operator**, taking into account various modalities of wholesale MVNO access and related retail costs. The year 2024 saw the procurement of counselling services, that is, model design support services, while the definition of methodological principles and the design of the economic replicability assessment tool are expected in 2025. The model will take into account the results of the regulatory impact assessment.

Timely and accurate market data are crucial for the prompt adoption of regulatory measures that are proportionate to identified market obstacles. Some data and indicators are used for reporting to other national and international institutions. HAKOM therefore regularly collects **data and indicators on market conditions** from operators providing electronic communications networks and services, associated facilities or related services, improving the method of data collection and publication on an ongoing basis. Given the increased use of OTT services and their importance for the communication of end-users, in 2025 HAKOM will analyse the possibilities of collecting data on OTT services (especially on number-independent interpersonal communication services and video-streaming services), building on the experiences and recommendations of BEREC member countries. Number-independent interpersonal communication services are services that do not connect with publicly assigned numbers in national or international numbering plans or do not enable communication with numbers in national

¹ European Benchmark of the pricing of bundles – methodology guidelines, https://www.berec.europa.eu/sites/default/files/files/document_register_store/2018/10/BoR_%2818%29_17_1_BEREC_Bundles_Price_methodology.pdf

or international numbering plans. These, as a rule, include messaging services, video-communication and electronic mail services. Due to their increased use in recent years, these services have become a key communication method for a variety of users. Regarding video-streaming services, HAKOM has been collecting data on these services only from fixed network operators.

A number of regular activities will be performed to implement or supervise the implementation of regulatory obligations imposed on HT as an operator with significant market power (SMP operator) in the markets subject to *ex ante* regulation: **the margin squeeze test (MST)**, conducted for all HT's retail offers in the broadband access market; **updating the value of the weighted average cost of capital (WACC)**, used for the calculation of regulated cost-oriented service prices to enable returns on infrastructure investments; **monitoring key performance indicators (KPI)** related to the activation of wholesale services and malfunction repairs; **amending the reference offers** of the SMP operator to define the best possible conditions for operators-users; etc.

In accordance with the Framework National Programme (FNP), HAKOM **will give opinions on the wholesale conditions and fees** for access to networks whose deployment is co-financed from EU funds and implement subsequent verification procedures regarding wholesale fees and conditions for already approved reference offers. In order for HAKOM to be able to give its opinion on the proposed fees, their amounts are checked once a year using the benchmarking method in relation to the same or comparable services offered in other areas in the HR, where operators operate under regular market conditions, including services provided by SMP operators the prices of which are set by HAKOM's regulatory measures.

In view of ongoing operators' investments in VHCNs, expectations are that these networks will be increasingly used for wholesale services, which may give rise to disputes over network access. In order to be able to determine symmetric obligations for access, applicable to all operators irrespective of their SMP status, HAKOM has designed a cost model to **assess the possibility of economic replication of VHCNs** (ERT model). In the cases when the ERT model results establish that economic replication is impossible, HAKOM will determine conditions for access that enable economic replication for the access point at which access is initially required or impose access obligation at the access point beyond it (in the direction of the network) for which it is established that the technical and economic replication of the efficient operator is possible.

HAKOM is entrusted with the task of **managing the addressing and numbering space** in electronic communications, the efficient management of which is a precondition for market competition. This involves the monitoring of market conditions, timely preparation of addressing and numbering plans, prompt allocation of addresses and numbers as well as the adoption of the necessary regulations enabling users the portability and use of the addressing and numbering space. HAKOM is responsible for **maintaining and developing the Central Administrative Database of Ported Numbers (CADPN)** and in doing this acts in tune with the needs of users and operators. HAKOM is also responsible for the database of the HR's addressing and numbering space, ([e-Operator](#) system), 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.

Compliance with the regulatory framework

The [Roaming Regulation](#) (2022/612), which applies since July 2022, extends the roam-like-at-home scheme until 2032. The regulation sets forth **wholesale roaming price caps**, aimed at securing returns on costs for operators. In 2025, the European Commission will review existing wholesale roaming price caps, based on the cost model that started to be designed in 2023. This cost model will also be used for the calculation of **mobile voice termination rates (MTRs)**. In addition, the European Commission, after the consultations with BEREC, will submit two reports to the European Parliament and the Council, which will be followed, if necessary, by a legislative proposal to amend this regulation. The first report

is to be submitted by 30 June 2025. For the purposes of this report BEREC will deliver an opinion on the impact of this regulation and HAKOM will participate in the process.

Market Day, a traditional conference for the stakeholders of the electronic communications market, will be held in October 2025. The conference aims to present the activities carried out in the previous year and announce future activities as well as to provide a forum for discussing the current condition and further development of the electronic communications market with the representatives of operators, consumer protection associations and other stakeholders.

The supervision of regulatory compliance will encompass the monitoring of **key performance indicators (KPI) related to the use of the ECI**. Special attention will be paid to the submission and realisation of requests in accordance with the Reference Offer of Hrvatski Telekom, which refers to the manner and conditions of access to and the shared use of the electronic communications infrastructure and associated facilities, including cable ducts.

Quality and accessibility of services

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 2025, HAKOM will continue to supervise the following:

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

According to available data, three quarters of the EU population have no access to the **IPv6 protocol** and there are considerable differences across Member States concerning its application. Furthermore, the Open Internet Working Group of the Body of European Regulators for Electronic Communications (BEREC) has noted that public IP addresses are key for enabling users to realise their rights to use and provide applications, as specified in the regulation. In 2025 HAKOM will, in cooperation with other national institutions, primarily the Ministry of Justice, Public Administration and Digital Transformation (MJPADT) and the Croatian Academic and Research Network (CARNET), industrial sector, operators and academia, work proactively on the national promotion of the IPv6 transition. Accordingly, the national guidelines for the promotion of IPv6 are planned to be prepared in 2025.

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 geographic 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. HAKOM, once in three years, implements a procedure establishing the need to designate a universal service operator. As such operators were designated in 2024, HAKOM will in 2025 analyse the semi-annual and annual indicators on universal service provision quality.

The security of networks and services in electronic communications is becoming a precondition for the use or provision of services, an area in which HAKOM plays a significant role. HAKOM cooperates with operators and other competent institutions in the HR and EU and acts as an advisory and supervisory authority as regards ensuring a minimum level of security of networks and services, analysing risks, risk treatment plans and security reviews for operators' networks and services. HAKOM also collects reports on security incidents, which operators are required to submit pursuant to the legal framework, thus obtaining information on the state of security of operators' networks and services and the adequacy of implemented measures. **The EU has adopted the new [NIS2 Directive](#)** (Directive 2022/2555) in order to eliminate the problems detected during the application of the previous directive. The new directive aims to achieve an efficient management of the organisation and security processes in the cyberspace of the EU and in the national cyberspaces of Member States. **The NIS2 Directive is the EU's central act on cybersecurity, but also just one act within the EU's cybersecurity legislation package, proposed in 2022, which also includes the DORA Regulation² (financial sector) and the CER Directive³ (critical infrastructure),** The NIS2 Directive is also related to the CSA⁴ (cybersecurity certification) and the CRA⁵ (cybersecurity requirements for products and services). **On 26 January 2024, the Republic of Croatia adopted the new [Cybersecurity Act](#) (CA), which transposes NIS2.** In accordance with the CA, HAKOM remains the supervisory authority for the electronic communications sector. In addition, the CA prescribes the adoption of important subordinate legislation to provide for the complete transposition of NIS2 Directive (The Regulation, National Cybersecurity Crisis Management Programme). The HR also plans to adopt the new Critical Infrastructure Act, which proposes that HAKOM be the competent authority for the electronic communications sector.

In 2025, HAKOM will continue work in **the national working group for the transposition of the NIS2 Directive** related to the preparation of the subordinate legislation under the CA in the part falling within its competence: defining essential and important entities pursuant to the CA and critical entities pursuant to the CIA, establishing a register of essential, critical and important entities, prescribing their obligations, supervising the implementation of cybersecurity requirements and critical infrastructure security requirements, etc. In addition, through further **cooperation with the members of the national cyber crisis management working group** (SIA, MoI, ISSB, CARNET, NCERT, HAKOM and CNB), HAKOM will continue to work in accordance with the national standard operating procedure (SOP) and to raise

² 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 NIS2 Directive (in addition to the Ministry of Finance (MF), the competent authorities for the implementation in the HR are the CNB and HANFA).

³ The Critical Entities Resilience Directive is the EU's key act on the critical infrastructure that all Member States are obliged to transpose within the same deadline as the NIS2 Directive, following a closely related approach: the CER Directive covers the physical security and the NIS2 Directive the cybersecurity; the CER Directive is related to the key sectors referred to in Annex I to the NIS2 Directive and all critical entities pursuant to the CER Directive (physical security) become essential entities pursuant to the NIS2 Directive (cybersecurity). The competent authority for the transposition of the CER Directive in the HR is the Ministry of the Interior (MoI).

⁴ 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.

⁵ The Cyber Resilience Act directly applies to all States, its purpose being to establish the EU's obligations related to the security certification of certain commercial products, including the Internet of Things (IoT), devices with built-in software or internet connection and software in general.

https://www.europarl.europa.eu/doceo/document/TA-9-2024-0130_HR.html

the awareness of all institutions about the state of the HR's cyberspace as well as about various phenomena and trends observed in the context of functional and sectoral responsibilities of the participating institutions. As part of the national SOP, HAKOM will compile quarterly **situational reports on the electronic communications sector** and timely resolve, in cooperation with other group members, potential cyber crises in this sector and related sectors.

The integrity and security of networks implies regulated relations between operators and the owners of the real estate they use. **The right of way**, and the right of servitude, regulate the right of access to, installation, use, repair and maintenance of the electronic communications network and the electronic communications infrastructure and associated facilities, including cable ducts, as well as other related rights, which impose a burden on the real estate on which the ECI and associated facilities have been constructed and the use of the common good property and 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.**

Investments and innovations

Planning and good coordination of all stakeholders in the course of the construction of electronic communications networks can considerably reduce costs and accelerate the construction. Therefore, **an analysis of the regulatory framework for the electronic communication infrastructure (ECI) and very high capacity networks (VHCNs)** will be carried out with the purpose of promoting joint investments and reducing ECI and VHCNs' construction costs. The analysis will serve 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 focus on enabling the broad accessibility of VHCNs for residential, commercial and other facilities.

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

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 the monitoring and analysing of the 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.**

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.

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, delivering a written opinion on the draft proposal of a physical plan aimed for public consultations.

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.

The tables below present HAKOM's activities planned for 2025. 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. For activities in the table marked with * regulatory impact assessment (RIA) will be carried out..

HAKOM's activities in the electronic communications market in 2025					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
1 *	Complete the analysis of the wholesale dedicated capacity market (M2/2020 and M14/2003)	Analysis of the relevant market completed Regulatory obligations defined	II	N	2.1, 2.2
2	Harmonise regulatory obligations of SMP operators with the analysis of the wholesale dedicated capacity market	Regulatory obligations of SMP operators harmonised Relevant reference offer amended	IV	N	2.1, 2.2
3	Verify the status of geographic units in wholesale broadband access markets (M1/2020 and M3b/2014)	Geographic units belonging to competitive/non-competitive areas defined Regulatory obligations repealed or imposed depending on the competitiveness status	III	N	2.1, 2.2
4	Supervision of the implementation of the Equivalence of Input model (Eol)	Report on the status of the implementation of the Eol and recommendations for follow-up activities	IV	N	2.1, 2.2
5	Adjustment of MST tools in line with the amendments to the Methodology	MST tools modified and all retail offers for which the test is carried out tested	I	N, 3237	2.1
6	Analysis of retail prices	Methodology for the analysis of retail prices prepared	IV	N	
7 *	Develop a model for the assessment of economic replicability of the 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	IV	N, 3237	2.1, 2.2

HAKOM's activities in the electronic communications market in 2025					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
		various modalities of wholesale MVNO access and pertaining retail costs			
8	Modify market review questionnaires to collect data on OTT services	Possibilities to collect data on OTT services analysed and data collection questionnaires prepared	I	N	2.1, 5.1, 5.2
9	Update WACC values	WACC values established	IV	N	2.1, 2.2
10	Carry out an economic replicability test for VHCNs	Economic replicability test is used if necessary for the implementation of symmetric regulation	ongoing	N	2.1, 2.2
11	Amend reference offers	New wholesale conditions in reference offers	ongoing	N	2.1, 2.2
12	Issue opinions on reference offers for access to networks co-financed from EU funds	HAKOM's opinions regarding reference offers	ongoing	N	2.1
13	Conduct the margin squeeze test (MST)	Tariff packages/offers of operators subject to the MST in accordance with the Methodology	ongoing	N	2.1
14	Collect and process data on the EC market	Reports on electronic communications market indicators	quarterly	N	2.1, 5.1
15	Supervise the implementation of regulatory obligations	Analysis and disclosure of regulated wholesale KPIs, supervision administrative acts	ongoing	N	2.1, 2.2
16	Resolve regulatory disputes between operators	Administrative acts	ongoing	N	4.2
17	Implement activities related to roaming regulation	Support to BEREC and operators	ongoing	N	4.1, 1.1
18	Monitor and supervise the implementation of obligations for MVNO access	Enabled access to MVNOs	ongoing	N	2.1, 2.2
19	Process reported security incidents	Internal report and/or intersectoral report and/or inspection supervision	ongoing	N	1.3
20	Analyse the security of networks and services and	Reports on cyber incidents and network security Quarterly reports (SOP) Annual reports (SOP)	quarterly II	N	1.3

HAKOM's activities in the electronic communications market in 2025					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
21	Preparation of subordinate legislation under the CA in cooperation with other authorities within the national working group	Regulation prepared National Cybersecurity Crisis Management Programme prepared HAKOM's in-house SOP developed	I	N	1.3
22	Categorisation of entities pursuant to the CA and CIA	Register of essential, critical and important entities set up; notifications on the rights and obligations of operators prepared and submitted	II	N	1.3.1.3.
23	Development of guidelines for important entities pursuant to the CA and Regulation	Guidelines developed as an independent document or as part of an appendix to the ordinance	III	N	1.3
24	Promote the use of IPv6 addresses in cooperation with other relevant authorities	National guidelines developed	IV	N	1.1
25	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 II	N	1.1
26	Analyse quality parameters for the operator's service provision	Semi-annual reports	I and III	N	1.1
27	Manage the addressing and numbering space	Numbering and addressing plan Decisions to operators on the allocation of addressing and numbering resources	ongoing	N	2.3
28	Ensure and monitor the number porting process	CADPN in operation	ongoing	N	1.1
29	Supervise the quality of universal service provision in electronic communications	Annual report on the universal service provision quality	ongoing	N	1.2
30	Process registration applications and notifications on the start or termination of the provision of electronic communications services	HAKOM's certificates and updated list in the e-Operator EU register of operators updated with Croatian operators	ongoing	N, 3238, 454	2.2
31	Supervise the implementation of regulatory obligations for the ECI	Analysis of regulated KPIs for the shared use of cable ducts	ongoing	N	4.1

HAKOM's activities in the electronic communications market in 2025					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
32	Implement GIA in cooperation with other public authorities in the working group	Proposal of regulatory amendment	ongoing	N	4.1
33	Upgrade the system of collecting data for the geographic review of coverage by broadband networks and their use (mapping) – GIS portal	Upgraded GIS portal	III	N, 454	3.1
34	Collect and process data on the broadband access coverage	Graphical display accessible on the GIS portal	ongoing	N, 3237	3.2
35	Issue opinions in the procedure of drafting and adopting physical plans and public consultation, including the State Plan for Spatial Development	opinion of HAKOM	ongoing	N	3.1, 5.1
36	Establish special conditions for construction/connection conditions/grant main project certificates	HAKOM's administrative acts	ongoing	N	5.1
37	Identify the infrastructure operator (right of way)	Right of way certificates	ongoing	N	1.3
38	Issue Broadband Ready labels for new constructed buildings and buildings that have undergone major renovation	Broadband Ready label	ongoing	N	3.1

Postal services

The postal market in the European Union and the Republic of Croatia has seen major changes in recent years due to continuing digitalisation and changes of shopping habits. Despite these challenges, the market has remained resilient and key market trends have persisted: total revenues and parcel services have grown, while the letter segment has recorded a decrease.

With its roles and tasks remaining unchanged under such circumstances, HAKOM has adjusted its regulatory activity to respond to new circumstances and market trends. Future work and activities have been planned with a special attention paid to proposals and initiatives related to the new postal regulation, which aims to adjust postal services to users' new demands and market changes.

HAKOM's key priorities have remained the same: ensuring the sustainability of the universal service in the whole territory of the Republic of Croatia, while complying with the prescribed quality, promoting and creating conditions for fair market competition, removing barriers to investing in and developing the postal sector and protecting postal service users.

Market competition

HAKOM's regulatory activities are based on the competences granted under the Postal Services Act (PSA) and the accompanying subordinate legislation, which are aligned with the provisions of international regulations (the acts of the Universal Postal Union, EU Postal Directive and Regulation on cross-border parcel delivery services).

Some of the important competences 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 realised primarily by the ongoing collection of statistical, financial and other data from all postal services providers, which will serve as a basis for various analyses required for the adoption of regulatory decisions and the preparation and publication of the most important indicators and market trends. **The collected data will also be used to complete the questionnaires of the bodies in charge of monitoring and analysing conditions in the EU and global postal markets (EC, ERGP, UPU, etc.), meet the needs of government bodies and institutions (MSTI, CBS, CCA, etc.) and respond to various inquiries (journalists, providers, etc.).**

Part of HAKOM's activities will be focused on monitoring **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 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 basis. HAKOM will also be monitoring and verifying the regularity of prescribed procedures related to the protection of postal services users.

Amendments to the Ordinance on the provision of universal service, in the part related to the setting of tariffs for **postal network access**, have enabled the continued development of the postal services market, while ensuring efficient market competition as well as a high quality of services and their accessibility to users. In the following period HAKOM will monitor the setting and application of new tariffs and of the conditions and obligations related to network access in order to provide access users with equal conditions, while enabling fair market competition. Based on an analysis, HAKOM will, as appropriate, impose prescribed regulatory measures to amend the conditions of network access and carry out the prescribed procedure for the resolution of disputes related to network access, if any. Also monitored will be the new modalities and models of service provision related to e-commerce that may

potentially be classified as part of postal services, which may require their regulation in accordance with the PSA in order to create equal conditions in the parcels segment of the market.

As in the previous years, HAKOM will perform an independent audit of the Regulatory Financial Statement (RFS) submitted by HP. Pursuant to the PSA, the universal service provider is obliged to **perform the accounting separation of revenues and costs** for universal, interchangeable and other postal services in keeping with the methodology prescribed by the [Instruction](#), adopted by HAKOM. The reliability of accounting operations will be verified by an audit, to be followed by a Statement of (Non) Compliance with the Methodology. Based on the audited Statement, HAKOM also carries out other regulatory activities, including the regulation of the prices of services within the scope of the universal service and the prices of access to the postal network of the universal service provider.

The audited Statement also serves as a basis for HAKOM to verify the accuracy of the calculation of **the cost of the 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, on the basis of the calculation, specifying the net cost, which is paid to the universal service provider from the state budget.

HAKOM will continue to monitor prices for the basket of services from the scope of the universal service according to the [Price Cap Calculation](#) for the period from 2023 to 2025 by analysing deviations from the planned values of key parameters influencing the price of the basket in accordance with the prescribed methodology and, in line with the results, decide on price correction.

Compliance with the regulatory framework

In accordance with the conducted analysis of the existing **postal network of the universal service provider** and the simulation of new solutions for network optimisation, which would, among other things, result in the reduction of the unfair financial burden on the designated universal service provider (the unfair financial burden on the designated provider is paid from the state budget), HAKOM plans to launch the procedure of amending the Ordinance on the provision of universal service as regards the organisation of the postal network of the universal service provider.

HAKOM's activities will in part be related to international postal traffic, primarily to obligations deriving from **the Regulation on cross-border parcel delivery services**, including the statistical and financial monitoring of cross-border parcel traffic and the monitoring of prices from the scope of the universal service. HAKOM will, in accordance with the established methodology, carry out an assessment of service tariffs (prices) that are considered to be unfairly high, that is, appraise their justification. The collected data on the prices and the assessment of the tariffs will be submitted to the EC for publication on the EC website. HAKOM will devote additional attention to discussions and proposals related to the announced amendments to the global and European regulatory frameworks in order to actively participate in the preparation and harmonisation of new international regulations and their transposition into the Croatian legislation.

The good practice of dialogue with all market stakeholders will be continued, with a conference planned to be organised. HAKOM will be open for cooperation, counselling and meetings with all stakeholders. In order to monitor the use of postal services and satisfaction with prices, deadlines and postal services quality, a user survey will be carried out.

Quality and accessibility of services

The universal service provision has a special significance for the Republic of Croatia. **Hrvatska pošta d.d. (HP)**, pursuant to the PSA, has the right and obligation to provide this service. Therefore, the bulk of

HAKOM's regulatory activities includes the control of HP's 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 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 do not comply with regulations.**

HAKOM will, on an ongoing basis, by checking the number of postal offices and other access points and the organisation of postal offices, monitor **the prescribed network density** of access points, paying special attention to compliance with prescribed procedures to be abided by in the case of closure or moving/reorganisation of postal offices, lest the quality of universal service be undermined, Postal offices' working hours will also be monitored and regulated as required. **Permitted deviations in the performance of universal service as set forth by the Ordinance will also be monitored, with a special focus on exemptions from the obligation of the five-day delivery of postal items to home address and interruptions in the provision of postal services caused by force majeure.**

HAKOM's will also focus its regulatory activities on one important segment: **the quality of universal service provision**, ensuring that the prescribed quality standards are met by carrying out inspection supervisions and by monitoring quality on an ongoing basis. Once it receives the Report on the quality of provision of universal service from HP, 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.

For activities in the table marked with * regulatory impact assessment (RIA) will be carried out.

HAKOM's activities in the postal services market in 2025					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
1 *	Analyse the organisation of the postal network and model and simulate new solutions	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 service 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	Calculate the price cap for a part of the universal service in the medium-term period	Decision on the price cap for the period between 2026 and 2028	IV	N	1.2

HAKOM's activities in the postal services market in 2025					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
7	Control the calculation of the price cap for a part of the universal service	Verified key parameters that influence the price cap and price adjustment	I, III	N	1.2
8	Monitor and analyse prices and discounts for the universal service	Affordable and cost-oriented prices for all users	ongoing	N	1.2
9	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
10	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
11	Resolve regulatory disputes	HAKOM decisions	ongoing	N	2.1
12	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
13	Monitor the impact of e-trade, online platforms 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; equal conditions created for all market stakeholders	ongoing	N	2.2
14	Supervise the implementation of the accounting separation obligation	RFS audit Compliance statement	III	N, 3237	2.1
15	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
16	Analyse the Report on the quality of provision of universal service	Revised Report and corrective measures	III	N, 3237	1.2
17	Respond to the inquiries and reports of users and other	Replies to users and other stakeholders	ongoing	N	4.2

HAKOM's activities in the postal services market in 2025

No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
	stakeholders of the postal services market				
18	Organise a conference with postal market stakeholders	Conference organised	IV	N, 3235	4.3
19	Survey of satisfaction and needs of postal services users	Results and indicators on the satisfaction and needs of users	III	N, 3237	1.2

Rail services

The development of the rail services market in the HR in the context of the single European rail services market is a positive example of the liberalisation of the freight rail transport. Two new undertakings a year, on average, contribute to the positive developments in transport, despite major infrastructure works. HAKOM will strive to enable efficient market competition and ensure generally available, transparent and non-discriminatory conditions for offering rail services and rail passenger transport services. In order for rail services users, primarily railway undertakings, and rail passenger transport services users, passengers, to be offered a high-quality and reliable service, part of the activities will include appropriate inspection supervisions to be carried out within the legal framework.

Market competition

Building on the achieved high level of market competition in the freight rail transport market, the supervision of the rail services market is the main activity based on which HAKOM *ex officio* monitors the development and condition of the rail services market. **Indicators on market development, collected and processed** in accordance with the preset parameters, are used to inform the interested public, on a quarterly or annual basis, while market stakeholders are additionally informed via consultations and conferences. In addition to collecting and processing data, HAKOM **submits the collected indicators** and, where necessary, explanations, to **the Ministry of the Sea, Transport and Infrastructure (MSTI) and the European Commission (EC)**. **The development of methodologies for the calculation of charges for rail services** will also continue to be monitored **by controlling these charges**.

An important precondition for efficient market supervision in the following year will be HAKOM's participation in the work of all working groups of the **EU's Independent Regulators Group (IRG-Rail) and the EC** and the preparation of in-house and publicly available publications and final analyses of the condition of the rail services market. Work in the IRG Rail's working groups involves co-chairing in the working group Access to Service Facilities, and drafting of the document *An Overview of the Quality Indicators System* in working group Charges, intended to provide the highest-quality analysis and presentation of market condition. HAKOM also participates in the work of the Single European Rail Area Forum (SERAF) and its working subgroups.

Compliance with the regulatory framework

HAKOM cooperates on a regular basis with all stakeholders in the railway system, especially with public authorities in the country and in the environment, the infrastructure manager, the operators of service facilities and railway undertakings, in order for appropriate and/or required measures to be taken. Preventive activities will include imposing measures on rail services market stakeholders aimed at improving regulatory efficiency by implementing the best regulatory practices.

Before adopting the business plan, the infrastructure manager in the HR is obligated to ensure access to relevant data to existing applicants and, upon request, to potential applicants, and to enable them to express their opinion on the draft business plan regarding the conditions of access and use of the railway infrastructure as well as its efficiency, accessibility and development. After access to relevant data has been provided, the draft business plan, including the opinions of existing and potential applicants, if any, must be submitted to HAKOM, which delivers a **non-binding opinion**. HAKOM will analyse the plan, verifying whether it comprises all segments required for a company of such size and significance, and provide its opinion.

Quality and accessibility of services

HAKOM will direct its activities towards generating growth trends in undertakings' services in the market and in the use of the railway infrastructure and rail services, while taking preventive actions in order to **ensure equal conditions and non-discriminatory access to rail services, services provided in service facilities and service facilities themselves** to all market stakeholders. By taking corrective actions via inspection supervisions conducted *ex officio* or based on requests submitted by railway undertakings, international groups of railway undertakings and other natural or legal persons, such as the competent authority as defined in Regulation (EC) No 1370/2007 of the European Parliament and of the Council of 23 October 2007 on public passenger transport services by rail and by road, shippers, freight forwarders or the providers of combined transport services having an interest in the performance of public services or a commercial interest in the assignment of infrastructure capacity, market will be controlled and obstacles identified and removed in a timely manner.

The development of the European rail market depends on the openness of the market and the accessibility of services, which is pre-conditioned upon a high-quality network of railway infrastructure and facilities. The Railway Act lays down the general **right of access to the rail network, service facilities and services provided in service facilities**. In addition to the accessibility of railway infrastructure, another condition for the performance of rail transport is the accessibility of services provided in service facilities. Proactive regulatory activities will remove potential and real barriers to smooth market functioning, including coordination with market stakeholders in the HR and promoting rail services providers' market orientation, which is to improve service quality. Stakeholders will continue to be informed about relevant IRG Rail documents.

HAKOM on an ongoing basis monitors the preparation, adoption, implementation and application of the conditions and criteria contained in the Network Statement and the Service Facilities Descriptions. A key process in 2025 will once again be the preparation and publication of **the Network Statement** as well as making amendments to the Statement and **the Service Facilities Descriptions**. The new established system of indicators of the infrastructure operator quality (performance scheme) will be closely monitored.

At end of 2024, HAKOM will carry out a market survey among service users to enable them to evaluate the quality of transport services and market relations. The analysis and **consultations with the providers of freight transport services** are planned to be completed in early 2025, when the outcomes of the consultations will be published. The consultations with the users of rail freight transport services and analysed outcomes will give the grounds for making conclusions on the satisfaction of stakeholders with the development and condition of the market, which is to provide guidelines for further regulatory activities.

HAKOM's activities in the rail services market in 2025

No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
1	Resolve regulatory disputes	HAKOM decisions	ongoing	N	2.1, 2.2, 4.2
2	Provide opinion on the infrastructure manager business plan	Opinion provided	I	N	3.1

HAKOM's activities in the rail services market in 2025					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
3	Supervise the implementation of the 2025 Network Statement and all amendments	Control - Publication of amendments to the Statement Regulatory compliance analysis	ongoing	N	2.1, 2.2, 4.2
4	Supervise the implementation of the 2026 Network Statement and all amendments	Control - Publication of amendments to the Statement Regulatory compliance analysis	ongoing	N	2.1, 2.2, 4.2
5	Supervise the preparation, publishing and implementation of the 2027 Network Statement	Control - Publication of the draft - Publication of the Statement Regulatory compliance analysis	ongoing	N	2.1, 2.2, 4.2
6	Control of compliance of Service Facilities Descriptions with Regulation 2017/2177	Analysis of compliance with the Regulation	ongoing	N	2.1, 2.2, 4.2
7	Keep the register of rail services of service facility operators	Register operational and updated	ongoing	N	4.2, 4.3
8	Control charges for rail services	Charges comply with regulations	ongoing	N	4.2, 4.3
9	Analyse the calculation of charges for services provided in the service facilities of infrastructure managers	Analysis performed	IV	N	4.2, 4.3
10	Analyse regulatory financial statements	Report	ongoing	N	4.2, 4.3
11	Supervise the rail services market – transparent and non-discriminatory conditions for the provision of services	Non-discriminatory and transparent conditions for access to the network and service facilities	ongoing	N	4.3
12	Collect and process data on the rail services market condition focusing on the infrastructure manager	Quarterly and annual data analysis Data disclosure	quarterly/ annually	N	2.1

HAKOM's activities in the rail services market in 2025

No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
13	Reporting to the EC and MSTI in the framework of rail market supervision	Report timely submitted and complete	IV	N	4.3
14	Organise a conference with rail market stakeholders	Conference organised	IV	N, 3235	4.3
15	Conduct consultations with the users of rail freight transport	Analysis of the consultations performed and published	I	N	1.3

RF spectrum management

The radiofrequency (RF) spectrum management is an important area of HAKOM's competence, as the RF spectrum is a naturally limited public good that needs to be managed rationally and responsibly to the benefit of the society, in line with the principles of objectivity, transparency and non-discrimination, with the aim to ensure a stimulating environment for investments, innovation and competition. 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, HAKOM's role is crucial in ensuring its efficient use by carefully planning and coordinating the RF spectrum use both in the HR and internationally, in accordance with national and international regulations and standards.

The most important activities include preparing the tables of use, allocation plans and the assignment of radio frequencies through the licensing procedure, in addition to the monitoring and coordination of the use of frequencies among various users and the removal of interferences, as well as a continued monitoring of the technological development and trends in the RF spectrum use.

The RF spectrum management is not only a technical process; it is also a regulatory challenge, which requires harmonisation with the international regulatory framework, in particular of the European Union, and cooperation with the International Telecommunication Union (ITU). The activities in 2025 will continue to ensure the efficient use of the RF spectrum in order to accelerate economic development and boost innovation and investment, while at the same time meeting the needs of all users in the digital age within the national and single European market.

Efficient management also requires daily, systematic control and supervision of the RF spectrum, measurements, 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.

Spectrum planning and licensing

In 2025, activities related to the defining of the use of the upper 6 GHz (6425-7125 MHz) frequency band are expected to continue at the European level. This refers to the possibility of sharing the radiofrequency band between public mobile/fixed communications networks (MFCN) and local radio networks (WAS/RLAN). The aim is to further harmonise the spectrum through the implementation of decisions in the national law. It is the continuation of the activities that are the result of the development of technological solutions and the WRC-23 decisions.

Depending on the results of studies and adopted decisions on spectrum harmonisation at the European level, it will be necessary to enable the use of the 3.8-4.2 GHz frequency band for broadband private networks by means of relevant regulations, while respecting the Croatian market-specific needs. This will give spectrum users in the HR the possibility to use larger quantities of the radiofrequency spectrum for broadband private networks relative to the current situation.

In 2025, the radiofrequency spectrum use is expected to be harmonised with the NATO regulations in the areas where harmonisation has not yet been fully achieved.

Taking into consideration the positive experiences and practice of organising events with the objective of fostering the application and **promoting new technologies**, such as the first conferences "5G Day" on 5G mobile communications networks, the conference held in 2023, "G Day", and "Day of New Technologies" held in 2024, at which the topics were also expanded from mobile communications networks to satellite communications, in 2025, HAKOM also intends to organise a similar thematic conference with current topics of the application and accessibility of different technologies and services.

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

In accordance with the obligations contained in licences, the holders of licences have the obligation to provide HAKOM with information on the geographical location and technical data for the installed base station or changed data on the existing radio station, which includes the data for each individual sector according to the pre-defined format before the start of operation. Also, on a quarterly basis, the holders of licences provide HAKOM with 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 2024, the [Agency for Electronic Media](#) awarded new concessions to broadcasters at state and regional levels for broadcasting the digital radio (DAB+) in multiplex MUX 1. In 2025, it is expected that the digital radio will contribute to a further development of the radio market and ensure the availability of a larger number of radio channels with different and specialised types of content to listeners. Since the frequency area foreseen for the analogue FM radio (87.5-108 MHz) is exceptionally congested, it is precisely the possibility of introducing new programme content that constitutes one of principal advantages of the digital radio (DAB+) in the VHF III frequency band (174-240 MHz). The process of international harmonisation of the technical parameters of digital radio transmitters will also continue in 2025, in order to ensure technical preconditions for the continuation of the implementation of the DAB+ platform. Since there is no obligation to put out 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 the market interest, HAKOM will publish and conduct public calls for the issuance of both the licences for the new digital radio (DAB+) multiplexes and for the two remaining digital television (DVB-T2) multiplexes at the state and/or regional level. The activities of ensuring and optimising technical parameters for concessions for the provision of FM radio services will continue in 2025, in accordance with the requests of existing broadcasters and the Agency for Electronic Media. The activities of **planning and optimising radio-broadcasting networks** will also be constantly implemented for the purpose of an efficient RF spectrum use, improved coverage of the existing networks and ensuring the conditions for the operation of new networks.

One of HAKOM's basic activities is the issuance of **licences and annual invoices for the RF spectrum use**, which will be continued by constantly improving the processes and services and ensuring a high standard of services for HAKOM's users.

The planned **insight into licences issued** via electronic channels, such as the personal user mailbox, the business user mailbox or the e-Citizens system, will be realised in the course of 2025 to ensure the availability of the insight for users into licences also by means of the mentioned electronic channels. The aim is to ensure that all users have an easy and quick access to their licences digitally, in addition to the already implemented e-signature service and the service of sending and downloading licences in electronic form. In addition to the mentioned licensing applications, there is also the application for the

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 2025, HAKOM will continue with **international activities on removing radio interferences** in the FM and VHF III (DAB+) frequency band. This particularly refers to the activities of the RSPG working group on cross-border coordination and cooperation (Good Offices), active within the European Commission's advisory Radio Spectrum Policy Group (RSPG). The first results of the request submitted by HAKOM in November 2022 to the RSPG for mediation and issuing an opinion proposing a coordinated solution to cross-border harmful interference in the FM frequency band from the Italian Republic are expected in 2025, since the mentioned request is being addressed intensively. 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 removing radio interferences originating from the Italian Republic.

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 in compliance with applicable norms, regulations and recommendations. The results obtained also serve as a 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 and 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 Ulijenje 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 2025. 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 – 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 aimed 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 the 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.

EMF level verification

The protection from radio communications electromagnetic fields (EMFs) in the areas of increased sensitivity has become HAKOM's regular activity. 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 radio stations with regulations in the field of electronic communications. These activities also indirectly ensure compliance with health care regulations governing EMF protection.

Throughout the year, 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](#).

For the purpose of informing the public and mobile telecommunications network users, HAKOM will commission the services of measuring and preparing the **report on the quality of mobile telecommunication services** in the HR for 2025. The objective of the report is to provide information on key indicators of mobile networks and in a simplified manner rank the quality of mobile telecommunication operators according to international standards. This project will enable the public to obtain independent and unbiased information on the quality of Croatian mobile networks. HAKOM will provide operators with the key indicators in original form in order to be able to optimise their networks based on the information obtained.

HAKOM's RF spectrum management activities in 2025					
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 documents prepared	ongoing	N	4.2
3	Organise an event (conference) to promote new technologies	HAKOM's "Day of New Technologies" conference	II	N, 3233, 3235, 3237	1.1
4	Harmonise RF spectrum internationally	Implementing agreements on spectrum use with neighbouring countries and radio stations harmonised	ongoing	N	2.3

HAKOM's RF spectrum management activities in 2025					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
5	Amend the Ordinance on RF spectrum use and adopt 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 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	<ul style="list-style-type: none"> – Efficient use of RF spectrum: – Improved coverage of existing networks – Conditions for the 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

HAKOM's RF spectrum management activities in 2025					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
15	Implement Measuring operation – WAS/RLAN in the 5 GHz frequency band	Detailed measurement reports	ongoing	N	2.3
16	Implement Measuring operation – measuring of key performance indicators for the quality 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, 3232, 422	2.3

Consumer protection

HAKOM, as the regulator for electronic communications, postal services and rail services markets, is responsible for the protection of users/passengers in all of these sectors. In the field of electronic communications, HAKOM primarily ensures the transparency of prices and operating terms and conditions, the quality of service and the accessibility of information and communication services to all citizens. HAKOM actively monitors and analyses the operation of operators, user complaints and resolves disputes between users and operators. On the postal services market, HAKOM is responsible for the quality of the universal service, monitors and analyses the treatment of users by postal services providers and ensures that the rights of postal services users are respected, including consumer dispute resolution. On the rail services market, HAKOM protects passengers' rights, ensures access to information on rail passenger transport services and tariffs and resolves disputes in rail passenger transport. At HAKOM, all disputes are resolved transparently and objectively on the basis of the recommendation of the [Commission for the Protection of User Rights](#), whose members also include the representatives of consumer protection associations.

In addition to these responsibilities, part of the activities also address the inclusion and accessibility of different network services for persons with disabilities and persons with reduced mobility, as well as for children as a vulnerable group of users. In addition to the above activities, the high level in the standard for the protection of all users will also be ensured in dialogue with the representatives of consumer protection associations and by quick responses within inspection powers available to HAKOM in the supervision of all three markets.

Protection of users of electronic communications

When using electronic communications, end-users may encounter issues and dilemmas, similar to those when using other public services. Therefore, HAKOM's task is to have effect on all stakeholders in order for users to be informed and educated and thus use the services in accordance with their needs and abilities. HAKOM will continue to influence the information on the rights of users in electronic communications by applying a preventive approach. In addition to the possibility of direct communication with end-users by phone, e-mail and through social networks, HAKOM will also participate in workshops that will be organised in cooperation with consumer protection associations. The practice of developing digital materials will be continued, which includes an updated informative leaflet on the rights of end-users, as well as the brochure, which mostly relate to the most vulnerable user groups. The materials will be distributed to users through consumer protection associations or at educational workshops. All materials can be freely downloaded from HAKOM's website. User education and information will also be conducted on social networks through targeted announcements. Part of the education will be conducted through the applications developed by HAKOM – [Quiz](#) and [Privacy Calculator](#).

In 2025, the work of the **operator consumer complaint commissions** will continue to be monitored and, based on the analyses carried out and the obtained results, operators will be provided with recommendations for the improvement of operation in the segment of user protection and inspection supervisions will be conducted if necessary. During the year, HAKOM will publish **semi-annual and annual reports on the work of operator commissions and the HAKOM's commission**, with the focus on the detailed analysis of users' complaints and operators' responses in the first and the second instance of the procedure that end-users undergo before submitting dispute resolution requests to HAKOM.

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

Special attention will be awarded to the education of **children, young people, parents and teachers about protection on the internet**. In February, HAKOM will mark the Safer Internet Day with operators

and interested stakeholders. Before marking the Safer Internet Day, HAKOM will provide all primary schools in the HR with the updated brochure containing the most important advice for children and parents for the safe use of the internet in the school year 2024/2025. A webinar will be prepared that will raise awareness among parents of the advantages and challenges of the digital environment. During the year, in agreement with schools, workshops for parents and children will be organised in order to raise awareness primarily among children and teach them about frauds and dangers on the internet, as well as how to act in such situations. The Privacy Calculator application, designed for the purpose of educating all users about the dangers and frauds that have become reality, will be updated due to the advancement of technologies and occurrence of new abuses.

HAKOM will continue to invest in raising awareness of all stakeholders about the accessibility of electronic communication services to persons with disabilities. The topic of the **accessibility of services**, as so far, will be among the more important ones. In addition to meeting all obligations under the ECA, activities will be focused on promoting the universal design and accessible solutions as well as on raising the awareness of all market stakeholders. In mid-2025, HAKOM will organise an **international conference on the topic of persons with disabilities** in the markets it regulates, with the objective of the exchange of experiences and ideas for improving accessibility and raising awareness in the society.

The **user application HAKOMetar** has been available for a number of years. It is a tool for measuring broadband access speeds in the fixed network, which enables users to check the contracted speeds. The measurement results are acceptable as relevant 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. HAKOM will continue to upgrade these applications so that users can have objective information about the speeds they use. Part of the activities will be focused on the revision of the **Cost Estimator** application, with the aim to facilitate the identification of the most favourable tariff in accordance with user consumer habits and needs. HAKOM will continue to keep and maintain the **Do Not Call Register in cooperation with the Ministry of the Economy (MoE)**, which prohibits traders to call or send SMS and MMS messages to users for promotion or sales purposes. Traders will still be able to access and check numbers in the Register through the available internet service.

Protection of postal services users

The protection of postal services users' rights is prescribed by the PSA and entrusted to HAKOM as the regulator of this market. The current protection system is primarily based on the information obtained from **the resolution of disputes between users and postal services providers**, the information from postal services users from the market or from the media and inspection supervisions. In accordance with the PSA provisions, dispute resolution proceedings will not only be used for direct protection of the user that has initiated the dispute, but the collected information will be used for the analyses and necessary corrections on the market through inspection supervisions or amendments to subordinate legislation and service providers' general terms and conditions. Based on the analysis of disputes and market information obtained from users, HAKOM will provide service providers with **recommendations and guidelines** aimed at establishing a uniform business practice, a more efficient resolution of users' complaints in the early phases of the procedure and eliminating observed inconsistencies. Part of the activities of the protection of user rights will be preventive through education and information about the rights and obligations of the service providers towards the users. **Information interesting to users** will be regularly **published** and cooperation with interested consumer protection associations will be continued in order to make consumers as informed as possible about postal services and their rights.

Protection of passengers in rail passenger transport

The competence regarding the protection of passengers' rights in rail passenger transport is prescribed by the ARRSM, so that HAKOM is responsible for the implementation of Regulation 2021/782 on rail passengers' rights and obligations. This also includes the **resolution of disputes between undertakings and passengers**. When resolving individual disputes, it will be analysed what passengers mostly complain against. In this way, the needs for the improvement of transport services will be identified, the situation in the market will be monitored and preventive action will be taken if deficiencies are observed. The observed deficiencies will be systematically corrected and comprehensively addressed. The mentioned objective of the analyses will be to improve the system of the **terms and conditions and the manner of provision of services to end-users**, in particular to persons with disabilities and persons with reduced mobility. Analyses, findings from passengers from the market or from the media that also include **consultation with passengers** will be the basis for inspection supervision procedures.

Part of the activities in 2025 will include **information and education of passengers** about their rights and obligations and the obligations of undertakings. This will include the provision of information to users directly, through social networks and media, cooperation with consumer protection associations and preparing user materials.

In 2024, HAKOM, the Faculty of Electrical Engineering and Computing, University of Zagreb (FER), HŽPP, HŽI and the associations addressing the topics of persons with disabilities implemented a joint project aimed at improving the education of railway staff on the issue of accessibility and appropriate methods of communication with persons with disabilities. In 2025, HAKOM will pay special attention precisely to this project's results and evaluate the results and the impact on the situation on the market.

Persons with disabilities

HAKOM pays special attention to persons with disabilities in all three network industries that are regulated. In addition to meeting legal obligations, HAKOM pays additional attention to persons with disabilities by launching different initiatives and projects. The **Accessibility Programme** has been implemented in cooperation with FER, the associations of persons with disabilities and other interested parties since 2018. Every year, this programme includes the project focusing on addressing specific accessibility challenges related to the markets of electronic communications, post and passenger rail transport that have previously been jointly identified with the associations of persons with disabilities as partners in the programme. In 2025, HAKOM will continue to research the possibilities of the implementation of artificial intelligence to improve digital accessibility. The objective is to ensure that digital information is as accessible and as adjusted as possible to persons with disabilities. It will additionally increase their inclusiveness in the digital society and facilitate the use of services.

In mid-2025, HAKOM will organise the **2025 Accessible Future Conference**. The objective of the conference is to connect policy-makers and regulators, the industry and the media as well as standardisation and technology experts with users, persons with disabilities, as well as to raise awareness about this topic in the society.

HAKOM's user and passenger protection activities in 2025					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
1	Implement the 2025 Accessibility Project	2025 Accessibility Project	IV	N, 3239	1.1, 5.3
2	Organise a conference with the topic on persons with disabilities	2025 Accessible Future conference	II	N, 3233, 3235, 3237	1.1, 4.3
3	Resolve user disputes with electronic communications operators	Administrative acts	ongoing	N	1.1, 4.2
4	Analyse the work of operator consumer complaints commissions	Semi-annual and annual reports	I and III	N	1.1
5	Cooperate with the representatives of operator consumer complaints commissions	Recommendations for improvements in the processing of consumer complaints	ongoing	N	1.1
6	Analyse operators' general terms and conditions, special conditions and price lists	Recommendations for amendments due to deficiencies	ongoing	N	1.1 4.2
7	Monitor and measure the quality of provided electronic communication services, simple and transparent selection of service providers	Applications operational: HAKOMetar HAKOMetar Plus Cost Estimator	ongoing	N, 3238	1.1
8	Maintain Do Not Call Register and cooperate with the ME, traders and users	Register operational, accessible to users and traders	ongoing	N, 3238, 454	1.1
9	Inform and educate electronic communications users	Workshops and lectures, media appearances, social media posts Cooperation with associations Brochure, leaflet and video Responses to user inquiries given in the shortest possible period	ongoing	N, 3233	1.1
10	Increase accessibility for persons with disabilities	Accessibility of services and products to persons with disabilities	ongoing	N	1.1

HAKOM's user and passenger protection activities in 2025					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
11	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, 3235	1.1
12	Resolve user complaints with postal services providers	HAKOM's decisions	ongoing	N	1.1
13	Cooperate with the representatives of user complaints commissions at the provider	Recommendations for improvements in the processing of consumer complaints	ongoing	N	1.1
14	Inform and educate postal services users	Workshops and lectures, media appearances, social media posts Cooperation with associations Responses to user inquiries given in the shortest possible period	ongoing	N	1.1
15	Passenger dispute resolution	HAKOM's decisions	ongoing	N	1.1,1.2, 4.2, 4.3
16	Monitor general terms and conditions of transport contracts	Legal and fair transport contract conditions for all passengers	ongoing	N	1.2
17	Implement the recommendations under the 2024 Accessibility Project	Workshops	I – IV	N	1.1, 5.3
18	Conduct consultation with users of passenger rail transport	Consultation analysis prepared and published	I	N	1.1, 1.2
19	Inform and educate passengers	Media appearances, social media posts Cooperation with associations Passenger information materials Responses to user inquiries given in the shortest possible period	ongoing	N, 3233	1.1

Broadband Competence Office (BCO)

HAKOM's role as the Broadband Competence Office (BCO) is to identify and eliminate market failures affecting broadband coverage. Through connecting different user groups, informing and consultation and promoting the use of EU financial instruments, the BCO fosters the development of very high capacity networks (VHCN), which also includes 5G networks, and stimulates the demand for VHCN networks.

The BCO is also responsible for the implementation and monitoring of national plans and strategies as well as for providing expert assistance to public authorities and local self-government units (LSUs) related to broadband access.

In 2025, the BCO will continue **informing citizens and business entities about broadband access**, primarily through the regularly updated [website](#). Its further development and the use of available financial instruments will be promoted through workshops, presentations and meetings with interested user groups or by participation in events related to broadband access.

National Recovery and Resilience Plan (NRRP)

Funds ensured under the [NRRP](#) measure **C2.3 R4-I1** were allocated in 2024 for the implementation of broadband infrastructure development plans in areas lacking sufficient commercial interest for investments. Twenty-two co-financing agreements were signed. HAKOM will **monitor their implementation in 2025 and 2026**, i.e. until the completion of the projects. Since the projects are implemented according to the rules of the Framework National Programme for the Development of Broadband Infrastructure in Areas Lacking Sufficient Commercial Interest for Investments (FNP), HAKOM also performs activities for these projects in accordance with the FNP. 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. HAKOM will publish the information on activities related to the NRRP at <https://nop.hakom.hr/>.

BCO workshops

As the national BCO, HAKOM is a member of the Broadband Competence Offices Network (BCOs Network) at the EU level. The BCOs Network organises a large number of workshops and meetings with the aim of exchanging knowledge and experiences among Member States in which BCO representatives will participate regularly in discussions and prepare presentations depending on workshop topics. Workshop information relevant for citizens, business entities and LSUs will be **published on the BCO website**.

In 2025, the BCO will **organise an international workshop for all BCOs Network members** in Croatia. In addition to working on current topics for the future market development, participants will be informed about examples of best practices from projects implemented in Croatia.

Available financial instruments

One of the important BCO tasks is to monitor available EU funds that enable the financing of broadband access. This includes European Structural and Investment (ESI) funds that co-financed the construction of broadband infrastructure under the FNP, the Connect Europe Facility (CEF) and special financial instruments formed by special EC decisions, such as the Recovery and Resilience Facility (RRF).

In 2025, the BCO will monitor and **inform potential users about the opportunities for the use of available funds**. Activities related to the CEF digital component within which 5G smart communities, 5G corridors, submarine cables and projects that enable connectivity at a global level with the application of advanced technological solutions are primarily expected.

The financial allocation is managed through the so called "direct management", that is, the EC, through the European Health and Digital Executive Agency (HaDEA) evaluates projects directly and allocates funds. The funds allocated through the CEF financial instrument are not subject to state aid rules and projects that are submitted must first obtain the certificate of a Member State in the form of the Letter of Support.

As the Croatian BCO, HAKOM participated in the work of the CEF expert group for the digital sector, together with a CARNET representative. The work of this working group was coordinated by the European Commission, i.e. DG Connect. Further work has continued at the CEF Coordination Committee for the digital sector in which the Republic of Croatia is represented by a HAKOM representative. The CEF Coordination Committee, as a gathering of representatives of the Member States, approves the multi-year work plan. Projects cannot be approved for co-financing without the prior positive opinion of this Committee. The new multi-year programme for 2024-2027 is currently being adopted. It will be discussed at the Committee meeting. Taking into consideration the changed political context in terms of the greater significance of security and resilience of the digital infrastructure, the emphasis will primarily be on co-financing core networks, in particular submarine cables. Since in accordance with the Cybersecurity Act (OG 14/24) HAKOM is the competent authority for the implementation of cybersecurity requirements for providers of public electronic communications networks and providers of publicly accessible electronic communication services, HAKOM has the obligation to **verify whether operators as applicants for CEF co-financing meet cybersecurity requirements**.

Activities of the Broadband Competence Office in 2025					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
1	Cooperate with ministries, agencies and business entities on NRRP implementation (MSTI, CFCA, operators)	Activities related to NRRP implementation carried out	ongoing	N	3.2
2	Participate in the Operational Programme Competitiveness and Cohesion (OPCC) Monitoring Committee	Monitoring progress in achieving specific OPCC objectives Committee meetings	ongoing	N, 3233	4.2
3	Monitor the implementation of measure C2.3 R4-I1 from the NRRP	Written reports on NRRP 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

Activities of the Broadband Competence Office in 2025					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
5	Inform the European Commission on the implementation of measure C2.3 R4-I1 from the NRRP	Report on the implementation of the FNP and the NRRP	IV	N	5.1
6	Organise and carry out the international BCOs Network workshop in Croatia	Projects and good practices presented Workshop held	II	N, 3235	3.2, 4.1
7	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
8	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
9	Cooperate with stakeholders with regard to broadband development	Cooperation realised Work in expert groups Meetings	ongoing	N	3.3
10	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	3.3, 5.2

Digital Services Coordinator (DSA)

The Digital Services Act (DSA) was adopted at the level of the European Union on 16 November 2022, and it has been applied since 17 February 2024. The regulation has been adopted with the aim to improve the security and transparency of digital services and sets new standards for the responsibility and liabilities of online platforms in order to ensure better protection of users and mitigate the risks of illegal activities on the internet. The DSA applies to the providers of digital services that connect users with goods, services or content, including online marketplaces, social networks and search engines. By the Decision of the Government of the Republic of Croatia of 15 February 2024, HAKOM was appointed Digital Services Coordinator with the task to perform the duties of digital services coordinators under the DSA.

HAKOM's 2025 Annual Work Programme includes the key activities related to the DSA implementation. As the appointed Digital Services Coordinator, in cooperation with other relevant bodies and stakeholders, HAKOM will work on ensuring a consistent application of DSA provisions aimed at increasing the security and transparency on the internet.

One of HAKOM's main objectives will be monitoring and supervising the providers of digital services in order to ensure compliance with new regulatory requirements. This includes regular checks and audits of the operation of digital platforms active on the Croatian market. Supervision of the DSA application relative to very large online platforms and very large online search engines is jointly performed by the European Commission and Member States, while Member States are independently responsible for supervision of the DSA application to service providers under their competence.

HAKOM will also establish **mechanisms for the notification and addressing** problems related to illegal online content, which will increase user protection and mitigate risks from the misuse of digital services. For this purpose, the conditions for the award, suspension and withdrawal of the trusted flagger status will be defined and, if necessary, the conditions for the selection of an out-of-court dispute settlement body. Special attention will be paid to the protection of minors and vulnerable user groups.

Education and information of service providers and users will also be an important part of HAKOM's activities. Seminars and workshops will be organised so that all stakeholders get acquainted with the new obligations and rights under the DSA.

In addition, HAKOM will ensure measures for a better **data monitoring and analysis** in order to be able to respond on time to new challenges or opportunities in the digital environment. This proactive approach will enable better user protection and promoting innovation on the digital services market.

Finally, HAKOM will **cooperate with European bodies and regulators** in order to safeguard the harmonised application of the DSA at the level of the EU, and will regularly report on the progress and challenges in the implementation of these measures.

HAKOM's activities as the Digital Services Coordinator

No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
1	Participate in the adoption of the act on the DSA implementation	Comments and opinion on the proposal of the Act	I	N	4.1

HAKOM's activities as the Digital Services Coordinator					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
2	Participate in the work of the European Digital Services Committee	Meetings of the European Digital Services Committee held	I-IV	N	4.1
3	Coordinate and cooperate with competent bodies at national level	Cooperation of national competent bodies established	I-IV	N	4.1
4	Establish the record of obligors of DSA application	Criteria for providers of intermediary services established in the HR defined	II	N, 454	4.1
5	Use IT system for exchange of information with the European Commission	Use of joint EC IT system established at all competent bodies	II	N	4.1
6	Draft subordinate legislation under the Act on the Implementation of the DSA	Subordinate legislation adopted	III-IV	N	4.1
7	Coordinate and cooperate with other Digital Services Coordinators	Functional cooperation with other Digital Services Coordinators at EU level established	I-IV	N	4.1
8	Educate and inform service providers and users	Seminars, workshops	ongoing	N	4.1

HAKOM'S other activities

BEREC

In 2025, the President of the HAKOM Council will have the role of the outgoing BEREC Chair in the system of rotating chairmanship consisting of three members (incoming, current and outgoing). This role includes the handover of chairmanship at the beginning of the year and conducting BEREC's international activities throughout 2025. Special emphasis is on the organisation of a study visit of the inner chairmanship in the first quarter and on the organisation of a summit of BEREC and regional initiatives that gather non-EU regulators, such as the Eastern Partnership Regulators for Electronic Communications (EaPeReg), Mediterranean countries (EMERG), South America (REGULATEL) and the United States (FCC).

The outgoing chair is also responsible for preparing the Activity Report published during his 2024 chairmanship, which includes the implementation of the overall 2024 Work Programme, including ad hoc activities, such as BEREC's participation in discussions of the future of the electronic communications market. The completion of the annual report is foreseen for the second quarter of 2025.

Cooperation

The performance of activities falling within HAKOM's competence is inseparable from the cooperation with national, European and other international bodies and organisations, in whose work HAKOM primarily participates in its role of the national regulator. Furthermore, cooperation also includes the role of HAKOM as the HR representative.

Cooperation with international bodies and organisations is important for the harmonisation of regulatory frameworks and promotion of the development in Croatia. Cooperation serves for the exchange of information and the participation in the adoption of decisions and European policies, while protecting Croatian interests. Domestic cooperation primarily includes other public authorities, the stakeholders in regulated markets, the academia and civil sector representatives dealing with consumers or vulnerable groups.

As part of **international cooperation**, HAKOM regularly participates in the work of international networks of EU regulators: BEREC, IRG-Rail, ERGP; EC committees, such as the RSC, COCOM, CEF Coordination Committee, PDC; as well as expert working groups, such as the RSPG, HLIIG, EG112, SERAF and ENRRB. Within the EU, HAKOM is also active in the work of ADCO RED, NEB and NIS expert groups and 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 within the committee for electronic communications and post with ECC and CERP project teams. HAKOM also participates in the work of the Governmental Advisory Committee (GAC) at the ICANN.

Within the framework of **domestic cooperation**, HAKOM will continue its cooperation with ministries, other public authorities and stakeholders in the markets falling within its competence in order to meet the objectives of the organisation and achieve national strategic goals. An important part of domestic cooperation will be with 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 and the interests of Croatian citizens.

Regulatory impact assessment (RIA)

With the project for the implementation of a systematic and methodology-based regulatory impact assessment (RIA), regulatory decision-making processes were adjusted according to the adopted methodology and conditions for a consistent application of the RIA in the organisation were created at HAKOM. The regulatory impact assessment has been implemented since 2024 for all HAKOM's regulatory decisions with a significant impact, thus facilitating a more efficient market regulation focused on transparent and responsible decision-making process itself.

In 2025, HAKOM will continue to implement the RIA in all cases in which it is assessed that a due diligence of the impacts is required. The preliminary identification of activities currently assessed as requiring the RIA is separately marked with an "*" in the tables with activities.

Publicity of operations and access to information

Transparency is one of HAKOM's three core values. Publicity of operations includes the disclosing of any relevant information important to end-users or business entities, and not only the disclosures in legally prescribed procedures. Information is primarily provided 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). Cooperation with the media in providing relevant information from the three markets regulated by HAKOM is an important part of public activity.

In 2025, HAKOM's website in Croatian and in English will be regularly updated with current contents, and public information and advice will also be shared 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 influencing the market participants or user interests. HAKOM will also provide any information that may help users or facilitate the use of services.

Inspection activities

HAKOM's inspection powers ensure a better and timely reaction in the regulation of all three markets. Inspection supervisions and market controls and research will be conducted according to **the inspection's Annual Work Programme**, including if any deficiencies are observed in the markets falling within HAKOM's competence. The focus of inspection activities in 2025 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 passengers' 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.

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.

All cases in which due to the violations of laws or non-compliance with certain provisions there is a threat of a negative impact on a large number of users will be considered a priority, irrespective of previously planned inspection activities. Administrative acts will be published after the procedure is completed. **The Report on inspection supervision procedures carried out in 2024** will also be published in the course of 2025.

At the end of the year, **the Annual Inspection Plan for 2026** will be prepared, taking into consideration the current situation in the markets and the principles of proportionality and adequacy.

Proportionality 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.

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

Court proceedings

All substantive laws prescribing HAKOM's competence foresee administrative proceedings either before first-instance courts or directly before the High Administrative Court, as legal protection against HAKOM's decisions.

In 2025, HAKOM will participate as a party in administrative proceedings initiated against its decisions.

HAKOM will also, as authorised plaintiff, participate in misdemeanour proceedings that will be initiated after completed inspection supervision procedures in which violations of law are established.

For the protection of HAKOM's property rights and the state budget, HAKOM will initiate foreclosure proceedings against any debtors that fail to meet their obligations and, in case of a complaint, act as plaintiff in litigation proceedings.

HAKOM may also appear as defendant in litigation proceedings concerning property law relations.

Competence development and business processes improvement

Business process management has become HAKOM's regular activity. In 2025, focus will be on harmonising the process with the new business organisation and systematisation of positions. At the same time, for the purpose of improving efficiency and productivity, the constant optimisation and digitalisation of operations will continue, which includes the improvement of the existing processes or the introduction of new ones.

For the purpose of a further improvement of **the quality of operations**, HAKOM will continue to apply the tool for quality management in the public sector – the Common Assessment Framework (CAF). Since this is a framework for self-assessment that assists organisations to analyse and improve their activities based on standardised criteria, HAKOM will focus on the implementation of initiatives for improvements and their implementation in operations in the identified areas for improvement recognised during previous self-assessments.

Through a further systematic work in the areas of **project management**, advancements and improvements will be continued in business processes and the quality of operations, business performances, adjustment to changes in the markets and in society as well as the use of resources in the most efficient manner.

Strategies enable organisations to set goals clearly, use resources efficiently, gain competitive advantages and adjust to changes. Thus, a new **HAKOM's Strategy** for the next four years will be developed in 2025. The basis for its development will be the evaluation of the existing HAKOM's Strategy for the period 2022 – 2025, the EU and HR objectives in the markets of electronic communications, postal services and rail, the objectives of spectrum, addresses and numbers management as limited

resources, as well as HAKOM's objectives to continue developing as an agile market regulator at the service of the public and market stakeholders.

HAKOM's Ordinance on the internal organisation and systematisation of positions and its competence model define personal, digital, communication and specific competences that employees require for a successful work at any position. In order to stimulate continued professional development and advancements in employee careers and at the same time achieve a better harmonisation with HAKOM's strategic objectives, we aim to design and implement the **career and competence development** process. The career development process will contribute to the sustainable growth of the organisation by increasing its efficiency, innovation and competitiveness in the labour market and larger involvement and ability for a faster adjustment to changes.

The multi-year strategic project of the **development of organisational culture** at HAKOM will be completed in the first half of 2025. In the final phase of the project, the teams of employees working on common initiatives promote organisational values and beliefs that encourage taking responsibility and developing a business culture that appreciates and recognises good quality work and exceptional achievements.

e-Agency

The planned 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 and 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.

In 2025, the development of the delivery of documents via electronic channels will be continued, such as personal user mailbox, business user mailbox or the e-Citizens system, which, in addition to the other e-services, will further contribute to the enhancement of services provided by HAKOM.

In building the e-Agency, HAKOM will continue to carry 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 will continue to be carried out within the organisation and employee awareness about the importance of cybersecurity will be raised. The condition of the cybersecurity of HAKOM's own information system will be checked occasionally.

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.

Other HAKOM's activities in 2025

No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
1	Prepare a report on the implementation of the Annual Inspection Plan for 2024	Report on the implementation of the Annual Inspection Plan for 2024	II	N	4.2

Other HAKOM's activities in 2025					
No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
2	Implement the Annual Inspection Plan for 2025	Implementation according to the Annual Plan and identified needs	IV	N	4.2
3	Draft the Annual Inspection Plan for 2026	Annual Inspection Plan for 2026	IV	N	2.1
4	Prepare the annual report and the financial statement for 2024 and submit them to the Croatian Parliament	Annual report and financial statement for 2024	II	N, 3237, 3239	5.1
5	Prepare the annual work programme and the financial plan for 2026	Annual work programme and the financial plan for 2026	IV	N, 3237, 3239	5.1
6	Analyse and harmonise business processes	All processes that were subject to change analysed and harmonised	ongoing	N	5.1
7	Manage projects	Projects comply with the established project methodology	ongoing	N	5.1
8	Implement internal quality system assessment	Areas for improvement identified	IV	N	5.1., 5.2
9	Update web and intranet sites and other digital communication platforms	Relevant and timely information for the public	ongoing	N, 3238	5.1
10	Develop and maintain e-Agency services	New e-Agency services added and existing ones upgraded	ongoing	N, 3238, 454	5.1, 5.2
11	Prepare HAKOM's Strategy for 2026 – 2029	HAKOM's Strategy 2026 – 2029	IV	N	5.1, 5.2, 5.3
12	Develop organisational culture	Stimulating organisational culture	IV	N, 3237	5.2
13	Develop competences in accordance with HAKOM's competence framework	Competences developed	ongoing	N	5.3
14	Prepare Human Resources Strategy	HR Strategy	IV	N	5.3
15	Monitor the regulatory framework	Framework analysis Proposals of positions	ongoing	N	4.1

Other HAKOM's activities in 2025

No.	Activity	Result	Completion (quarter)	Fin. Plan	Strategic goal/Priority
16	Issue expert opinions	Expert opinions	ongoing	N	4.1., 4.3

Annexes

Description of accounts used in references

ACCOUNT	DESCRIPTION	2025 PLAN PROPOSAL *
		17,279,644
31	Expenses for employees	10,189,901
311	Salaries (gross)	7,226,100
312	Other expenses for employees	1,676,950
313	Contributions on salaries	1,286,860
32	Material costs	5,343,734
321	Employees cost reimbursements	752,460
322	Material and energy expenses	502,980
323	Expenses for services	3,802,094
	<i>3231 – Telephone, postal and transport services</i>	193,814
	<i>3232 – Current and investment maintenance services</i>	354,640
	<i>3233 – Marketing and information services</i>	170,000
	<i>3234 – Utility services</i>	61,250
	<i>3235 – Renting and leasing</i>	1,380,000
	<i>3236 – Health and veterinary services</i>	64,010
	<i>3237 – Intellectual and personal services</i>	445,980
	<i>3238 – Computer services</i>	754,200
	<i>3239 – Other services</i>	378,200
324	Compensation of expenses to unemployed persons	700
329	Other unspecified operating expenses	285,500
34	Financial expenses	12,500
343	Other financial expenses	12,500
38	Other expenses	8,000
383	Fines, penalties and damages	8,000
41	Expenses for procurement of non-produced fixed assets	130,000
412	Intangible assets	130,000
42	Expenses for procurement of produced fixed assets	1,092,200
421	Buildings	110,000
422	Plants and equipment	775,200
426	Intangible produced assets	207,000
45	Expenses for additional investments in non-financial assets	503,300
452	Additional investments in plants and equipment	50,000
453	Additional investments in means of transport	140,000
454	Additional investments in other non-financial assets	313,300

* 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 2025 is available at [HAKOM website](#).

ABBREVIATIONS

ARRSM – Act on the Regulation of Rail Services Market and the Protection of Passenger Rights in Rail Transport

BCO – Broadband Competence Office

BEREC – Body of European Regulators for Electronic Communications

BR – Radiocommunications Bureau, ITU

CA – Cybersecurity Act

CADPN – Central Administrative Database of Ported Numbers

CAF – Common Assessment Framework

CARNET – Croatian Academic Research Network

CBS – Croatian Bureau of Statistics

CCA – Croatian Competition Agency

CEF – Connecting Europe Facility

CEPT – European Conference of Postal and Telecommunications Administrations

CERP – European Committee for Postal Regulation

CFCA – Central Finance and Contracting Agency

CIA – Critical Infrastructure Act

CNB – Croatian National Bank

COCOM – Communications Committee

DAB – Digital Audio Broadcasting

DSA – Digital Services Act

DVB-T2 – Digital Video Broadcasting – Terrestrial2

EC – European Commission

ECA – Electronic Communications Act

ECI – Electronic Communications Infrastructure

ECS – Electronic Communications Services

EMF – electromagnetic field

ENISA – European Network and Information Security Agency

ENRRB – European Network of Rail Regulatory Bodies

EOI – Equivalence of Input model

ERGP – European Regulators Group for Postal Services

EU – European Union

FM – Frequency Modulation

FNP – Framework National Programme (for the development of broadband internet access)

GIA – Gigabit Infrastructure Act

GIS – geographic information system

HAKOM – Croatian Regulatory Authority for Network Industries

HR – Republic of Croatia

ICANN – Internet Corporation for Assigned Names and Numbers

IRG-Rail – Independent Regulators Group – Rail

ISSB – Information Systems Security Bureau

ITU – International Telecommunication Union

KPI – Key Performance Indicator

LSU – local self-government unit

MFCN – Mobile or Fixed Communications Network

MJPADT – Ministry of Justice, Public Administration and Digital Transformation

MoE – Ministry of the Economy

MoI – Ministry of the Interior

MST – Margin Squeeze Test

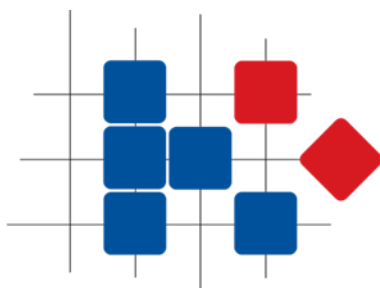
MSTI – Ministry of the Sea, Transport and Infrastructure

MVNO – Mobile Virtual Network Operator

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)

NRRP – National Recovery and Resilience Plan
OPCC – Operational Programme Competitiveness and Cohesion
OTT – Over-the-top service
PSA – Postal Services Act
PwDs – Persons with a disability
RA – Railway Act
RF – Radiofrequency
RFS – Regulatory Financial Statement
RIA – Regulatory Impact Assessment
RRB – Radio Regulations Board, ITU
RRF – Recovery and Resilience Facility
RSC – Radio Spectrum Committee
RSPG – Radio Spectrum Policy Group
SMP – Significant Market Power operator
SOA – Security and Intelligence Agency
SOP – standard operating procedure in cybersecurity
UHF – Ultra High Frequency: radiofrequency band spread in the range between 30 MHz and 300 MHz
UPU – Universal Postal Union
UPU – Universal Postal Union
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



HAKOM