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**European Commission
Directorate-General 'Internal Market, Industry,
Entrepreneurship and SMEs**

Notification Number: 2021/899/SI (Slovenia)

February 4th, 2022

Subject: Contribution to the draft proposal of ZEKom-2, notification number: 2021/899/SI

To Whom It May Concern,


In the area of the EU regulatory framework, Directive (EU) 2018/1972/EU of the European Parliament and of the Council of 11 December 2018 on the European Electronic Communications Code (hereinafter: Directive 2018/1972/EU) entered into force at the end of 2018, which dictates the need for implementation of the Directive into national law within a two-year timeframe, i.e. by 21 December 2020. In the Republic of Slovenia, a new Electronic Communications Act (hereinafter: ZEKom-2) has been drafted, the main objective of which is to implement the Directive 2018/1972/EU into the national legal framework. The ZEKom-2 is currently in the process of notification to the European Commission and in the legislative process in the Slovenian National Assembly.

T-2 d.o.o. (hereinafter: T-2), a Slovenian telecommunications operator, was established in 2004 and started offering services in 2005, namely telephone, IP television and VDSL internet services. Over the years, as one of the key telecommunications operators, we have co-created and shaped the development of the Slovenian telecommunications market. We have focused a large part of our activities on a construction of our own fibre optic FTTH network, which started in 2006. Today, we have one of the largest fibre optic networks in Slovenia, and we are presenting end users with an alternative to an operator with significant market power, which has built up much of its infrastructure in the monopoly era. Since 2008, T-2 has also been a mobile operator. Today, we are one of the leading providers of electronic communications networks and services for residential and business users in Slovenia.

The new telecommunications legislature in Slovenia should encourage the development and construction of very high capacity networks and services and, to achieve that, regulatory provisions should promote infrastructure competition in the market. We believe that taking into account our amendments, as provided for in the enclosed Report on ZEKom- 2 Amendments, prepared for T-2 by Coleago Consulting Ltd, would contribute to that objective, while also ensuring the new ZEKom-2 will reflect the principles enshrined in the Directive 2018/1972/EU. As explained in the said report, certain provisions of the current government proposal of ZEKom-2 do not sufficiently provide for effective competition and should therefore be amended. Should further explanation be needed, we are at your disposal. Do not hesitate to contact us at the following e-mail address: regulatory@t-2.com.

Kind regards,

Jure Valjavec, MSc.
CEO of T-2 d.o.o.

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