

# MULTIANNUAL ACTIVITY PLAN 2024-2026



MULTIANNUAL  
ACTIVITY PLAN  
**2024-2026**  
AND BUDGET  
**2024**

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ANACOM MULTIANNUAL  
ACTIVITY PLAN  
2024-2026

EXECUTIVE SUMMARY

## Executive summary

The Autoridade Nacional de Comunicações (ANACOM) defines its operating strategy for a three-year period, which is made public through the multiannual activity plan, including the strategic objectives for the three-year period and the main actions to be carried out during that period.

The main strategic guidelines were subject to public consultation, a procedure whose main objective is to strengthen the transparency of ANACOM's performance in the market, increasing regulatory predictability and promoting greater involvement of all stakeholders in the preparation of its structure of activities. The Plan now published, for 2024-2026, considers the contributions received, as developed in the respective consultation report, also available at [www.anacom.pt](http://www.anacom.pt).

One of the main objectives of the 2024-2026 multiannual activity plan is to help ensure that the whole country obtains the maximum benefit in terms of choice, price, quality, and security of postal and electronic communications services, promoting, through active, attentive and demanding regulation, the efficient investment, co-utilisation and sharing of infrastructure, thus ensuring fair and dynamic competition.

ANACOM remains actively committed to ensuring maximum protection of the rights of communications users throughout the territory, with special emphasis and attention to the most vulnerable populations, whether economically or geographically, promoting a regulatory framework and attentive supervision that prioritises information and transparency and discourages and sanctions bad practices.

It will also seek to strengthen and affirm regulation in Portugal, with full respect for its autonomy, impartiality and independence, and in strict fulfilment of its mission, whether by sharing information and knowledge or by promoting the efficiency and economy of means and resources that are essential to the full assumption of its responsibilities, which also include the powers and competences of the Space Authority (*Autoridade Espacial* - AE), under Decree-Law 16/2019 of 22 January.

The 2024-2026 multiannual activity plan, in an effort to enshrine the three strategic objectives defined by ANACOM, without ignoring the actions included in previous plans but looking ahead to an increasingly competitive and technological future, does not fail to promote principles of

equality and fairness, both in access to the market and in its development, aiming at healthy, fair and dynamic competition while safeguarding users' rights.

ANACOM will continue to defend principles that, by promoting competition, investment, and innovation, foster the emergence of better offers for consumers and companies, defining, in a three-year strategy, the purpose of establishing a stable and predictable regulatory framework, controlled and controllable, in a set of actions geared towards the market and the new technological solutions and tools that it brings about.

Also noteworthy in this plan are actions to respond to a new legislative framework, the emergence of new applications and services to which it is necessary to respond by making spectrum available, updating or drawing up existing regulatory frameworks that need a new vision, looking at space and cyberspace as assets of the future that presuppose rules and a watchful eye, always with the aim of ensuring greater improvement far into the future, promoting digital literacy and safeguarding the rights of everyone, operators and users.

ANACOM, as a regulatory and supervisory authority, has in this multiannual activity plan, by way of example, a guarantee of strengthening and accountability at this level, constituting an instrument for national valorisation at various levels, contributing to Portugal becoming an important international hub connecting continents, ensuring the verification of network coverage obligations and the development of new approaches to the supervision of networks and services through new sensor systems.

The constant monitoring of the sector at the level of the various international groups and organisations, with emphasis on cooperation actions with similar entities, particularly in Portuguese-speaking countries, as well as the concern with digital transformation measures that generate greater efficiency, are also actions contained in this 2024-2026 plan.

The financial plan remains focused on improving the effectiveness and efficiency of its activity in terms of optimising spending and a careful investment policy, particularly in terms of digital transformation, making it possible to ensure containment in terms of the regulatory fees applied to the sector, without neglecting the necessary means to act effectively as an independent regulator, taking into account the powers and responsibilities assigned to ANACOM, which result from the European Union (EU) legal framework and national legislation.



ANACOM MULTIANNUAL  
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FRAMEWORK

## Framework

The Autoridade Nacional de Comunicações (ANACOM) is the national regulator of the electronic communications and postal sector in Portugal, and its mission is to assist the government in these areas, without prejudice to its nature as an independent administrative body, and, on a transitional basis, to fulfil the role of space authority<sup>1</sup>.

Given the relevance of its activity to the market and considering the importance of regulatory predictability for the proper development of the sector, ANACOM has defined a three-year strategy embodied in objectives and actions that reflect the regulator's main strategic priorities. The deadline for carrying out the actions is given as a specific year (date of expected completion) or as a time interval (2024-2026), in cases where the action is recurring or the date of its start is uncertain because it depends on external factors not under ANACOM's control.

As part of the preparation of this multiannual activity plan, ANACOM, as enshrined in its Statutes<sup>2</sup>, submitted the main strategic guidelines for the three-year period to public consultation. As a result, the Plan for the next three years has endeavoured, as far as possible, to take account of all the contributions received, which can and should also be considered and reflected upon in all of ANACOM's regulatory and supervisory policy, whenever justified and appropriate. It also took into account the actions and assumptions defined for the previous plan (2023-2025), where they remain relevant for the three-year period covered by this Plan.

The proposed strategy for 2024-2026 maintains the central structure of the previous one, based on:

- **Strategic objectives:** the three objectives considered essential for the fulfilment of ANACOM's duties, which are established for the three-year period;
- **Actions:** of an annual or multiannual nature, and included in the three-year period in question, these are the specific activities aimed at contributing to the pursuit of the strategic objectives.

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<sup>1</sup> Pursuant to article 30 of Decree-Law 16/2019 of 22 January, and ANACOM's Regulation on the regime for access to and exercise of space activities, approved on 18 July 2019.

<sup>2</sup> Article 47(1) of [Decree-Law 39/2015 of 16 March](#).



In addition to its strategic objectives, specified through the strategic actions set out in point 4 of this document, ANACOM's activity in the 2024-2026 period will be guided by the following aspects:

- These include administrative modernisation measures with an impact on ANACOM's operation and on the relationship with other public and private entities, as well as with regulated companies and users.
- The challenge of the country's economic and social recovery, in the face of an international context marked by worsening global geopolitical and financial tensions, reflected in new shocks to international commodity prices, and the need to strike a fair balance between the legitimate interests and financing needs of service providers, on the one hand, and the needs and rights of consumers, companies and other users, on the other.
- The implementation of actions to boost Portugal's strategic position in the context of international connectivity, in line with the international connectivity strategy defined within the framework of international organisations. The creation of the necessary conditions to uphold Portugal as a strategic European point for data transit and processing, through the implementation of new submarine cable routes, strategic onshore sections, and new high-capacity datacentres. The need to implement a regulation capable of effectively addressing the diagnosis that this Authority has been making with regard to shortcomings in the competitive dynamics of some electronic communications markets. In particular, ANACOM will continue to act consistently to appropriately reduce the barriers to both entry and expansion in these markets, in order to encourage the emergence of diversified and competitive operations that guarantee competitive prices and quality and innovative offers; to encourage greater freedom and effective capacity for end users to choose - regardless of their socio-economic circumstances or geographical location - the offers that best suit their preferences and needs; and to guarantee adequate levels of coverage in the national territory.
- Responding to the growing connectivity needs of European citizens by increasing Europe's competitiveness and stimulating investment in very high capacity networks, ensuring the implementation of the European regulatory and institutional framework defined by Directive (EU) 2018/1972 of the European Parliament (EP) and of the Council of 11 December, which establishes the European Electronic Communications Code (EECC). Considering the reality in which Gigabit connectivity is increasingly decisive for the country's economic and social development, ANACOM will continue to develop initiatives and, where relevant, submit proposals in the context of its role in assisting the government, as well as monitoring and participating in developments taking place at international level to reduce the costs of

deploying high-speed electronic communications networks, specifically involving procedures and deadlines that facilitate their expansion.

- In the context of involvement in relevant wholesale markets, which are crucial for furthering competition in the provision of downstream services to end users, and in which there are operators with significant market power, ANACOM will continue to ensure that the wholesale offers regulated in this area present conditions, including prices, that guarantee the development and installation of very high capacity networks, and consequently the provision of services to end users by various operators, including smaller ones.
- Competition is a key mechanism in the promotion of ANACOM's mission, favouring investment, innovation, the variety of offers made available and the setting of adequate retail prices for the general population. However, even in competitive markets, there may still be a need to intervene to promote the protection of end users' rights in their relationship with companies, particularly large ones. In particular, following the transposition of the EECC, ANACOM intends to implement a series of measures over the next few years aimed at increasing the capacity of end users of electronic communications services to act in an autonomous, informed, and empowered manner in their relationship with the providers of these services. As well as this strengthening of end users' capacity being a good in itself, it also contributes to fostering a stronger competitive dynamic that responds more effectively and efficiently to the real needs of these users. Among the regulatory measures that ANACOM intends to implement over the next few years are: those aimed at improving access and choice regarding electronic communications services for people with disabilities; those aimed at facilitating and simplifying the process of changing Internet access service providers; the publication of information related to quality of service; the establishment of rules for automatic compensation of end-users in the event of non-compliance with contracted minimum quality levels; and the specification of the terms under which companies communicate contractual changes.
- ANACOM's actions will also take into account the modernisation of infrastructures, new solutions in terms of networks, services and terminal equipment, and changes in business models, market structure and commercial offers.
- For its part, one measure that takes into account both the competition dimension and the consumer protection dimension concerns the free television service. The possibility of benefiting from a free television service is positive for Portuguese society, helping to strengthen national cohesion and the effective participation of citizens in society. In addition, it is also a relevant instrument for positively influencing the competitive dynamics between providers of electronic communications services, insofar as the existence of a free

television service could guide the provision of communications services, and the respective competition in their provision, towards quality stand-alone Internet access services at appropriate prices. Given ANACOM's recent decision to renew the Digital Terrestrial Television (DTT) Right of Use for the Radio Frequency Spectrum (RURS) for a period of seven years, and also given the developments expected at European level, in which the Radio Spectrum Policy Group (RSPG) will continue to assess the possible uses of the band in the 2030s by the different EU Member States (MS) in order to make recommendations relevant to the decision on the use of the 470-694 MHz band after 2030, it is necessary to study appropriate and efficient models that will continue to ensure that the service provided to the entire population is free of charge after 2030.

- The emergence of new models for the co-utilisation and sharing of infrastructure and spectrum resources, as well as the new legal framework established by the EECC, with an impact on radio licensing, making it possible to adopt more efficient and effective spectrum management models, while also making life simpler for citizens and companies when interacting with public services.
- Also within the scope of spectrum management and planning, we highlight the challenges arising from the need to allocate frequencies for civil radio services/applications in order to meet current and future spectrum needs, in particular involving the 700 MHz, 1500 MHz and 26 GHz frequency bands, and the need for proper consideration of any procedures for renewing rights of use for radio spectrum in the period covered by this Plan.
- Similarly, attention needs to be paid to aspects related to consumer protection, which will include the application of what is established in terms of billing and complaints and the implementation of Regulation 2015/2120 of the European Parliament and of the Council of 25 November 2015 (Telecom Single Market Regulation - TSM), which establishes measures regarding retail tariffs applied to regulated intra-Community communications and the open Internet (net neutrality).
- Other relevant matters include, for example, updating the Regulation on Communications Security. The international geopolitical context emphasises the growing importance of the security of electronic communications networks and services. The ECL, approved by Law 16/2022 of 16 August, which introduced new matters in the area of network and service security, and the experience gained in the meantime with the application of the current regulation, made it possible to identify the need to revise Regulation 303/2019 of 1 April, on the security and integrity of electronic communications networks and services.
- It is also important to put in place and update a set of numbering rules, whether adapting to the ECL or taking technological developments into account, thus helping to promote

competition in the sector. In this context, the Portability Regulation should be updated in the light of the ECL and also to reflect the recent regulations on the designation of the '49' range of the National Numbering Plan (Regulation 532/2023 of 16 May) and the sub-allocation of E.164 numbers of the National Numbering Plan (Regulation 1028/2021 of 29 December), as well as the establishment of a set of rules aimed at making the use of geographic and mobile numbers in nomadic situations more flexible in a new regulation to be created. The aim is also to update the guidelines, principles and criteria for the management and allocation of numbering resources, taking into account the time elapsed since their initial definition in 1999.

- In the context of user access to emergency services, it is necessary to update Regulation 99/2009 of 23 February on providing emergency services authorities with caller location information for the single European emergency number 112, taking technological advances into account.
- Another aspect to highlight will be active participation in the discussion of developments and in the supervision and regulation of digital services and markets, as a result of their rapid evolution. The importance of accompanying the various international groups and *fora* where these issues have been discussed should be noted. ANACOM has been involved in the work of the Body of European Regulators of Electronic Communications (BEREC) on the subject, and it is worth noting that it will undertake the vice-presidency of this important group of regulators in 2024. ANACOM has also taken part in discussions on the subject in the context of the Digital Services Act (DSA) Committee, in the DSA's expert group and in its interim role as digital services coordinator, pending its appointment by the government.
- The implementation of and participation in sectoral and cross-sectoral innovation programmes, for example, the development of Technology Free Zones (TFAs), supercomputing, quantum implementation and artificial intelligence, relevant to the development of the sector.
- Extending the capacity of ANACOM's Laboratory and Standardisation Centre (*Centro Laboratorial e Normalização* - CLN) to the TEMPEST standard, helping to support national industry and innovation.
- The impact and contribution of communications to sustainability in general, promoting the green digital transition.
- In terms of broadband services, the massification of high-capacity Internet Protocol (IP) services (video streaming in the case of consumers and cloud-based services in the case of companies).
- The development of the satellite communications market, in particular the recent emergence of numerous projects based either on *cubesats* or on constellations of non-geostationary satellite

systems, with an impact, in particular, on the regulatory action of the Portuguese administration in the area of the procedures to be followed when notifying satellite systems to the International Telecommunications Union (ITU).

- With specific regard to aerospace, exercising the competences of SA, considering the National Strategy for Space 2030, and bearing in mind the particularities of regional contexts. Encouraging collaboration and coordination with the various national entities with competences in aerospace. Since ANACOM is the Space Authority, Portugal's international commitments and ambitions must also be taken into account.
- With regard to the postal sector, taking developments at European level into account in the process of evaluating and possibly revising the Postal Directive and the implementation (and possible revision during the three-year plan period) of the Regulation on cross-border parcel delivery services (Regulation (EU) 2018/644 of the European Parliament and of the Council of 18 April 2018), which aims to increase price transparency and improve the regulatory supervision of these services, as well as, at national level, developments associated with the monitoring and supervision of the new universal postal service concession.
- Initiatives at international level, particularly under the aegis of the ITU, the Universal Postal Union (UPU), the European Conference of Postal and Telecommunications Administrations (CEPT), the EU, the Organisation for Economic Cooperation and Development (OECD) and the North Atlantic Treaty Organisation (NATO), which will have an impact on the development of the communications sector on a global scale.
- The commitments established within the framework of cooperation with the regulatory authorities of other countries, an area in which the exchange and consultation with the regulators of Portuguese-speaking countries is particularly important.
- The need to strengthen coordination between cybersecurity bodies and ANACOM, especially with the National Cybersecurity Centre (CNCS), in order to share information on (cyber)security threats and incidents.
- The implementation of the Action Plan for the Digital Transition approved by the Government (Council of Ministers Resolution 30/2020 of 21 April), which provides for the implementation of measures aimed at the digital transition of the State, companies, and citizens in general, based on three pillars: empowerment and digital inclusion of people; digital transformation of the business fabric; and digitisation of the State. Although ANACOM collaborates on all the measures, the catalysts for Portugal's digital transition deserve special mention, namely regulation, privacy, cybersecurity and cyber-defence; connectivity and infrastructure; disruptive technologies; and alignment with the European

digital strategy.

- The pertinence and essentiality of creating a Security Incident Response Team at ANACOM (known as CSIRT-ANACOM), to guarantee ANACOM's full support and protection, to support CPEC (Emergency Communications Planning Committee) and the main stakeholders in the sectors regulated by ANACOM, as well as to achieve and strengthen effective cooperation with the CNCS for the efficient handling of incidents in the communications sector.

With regard to technological evolution and the strong dynamics of the market, it is expected that the 2024-2026 period will continue to see the expansion of high-speed fibre optic networks and the strengthening of 4G and 5G coverage. In this scenario, certain mechanisms - such as co-investment and infrastructure sharing - will be key in speeding up full coverage of the national territory. Also of note is the technological evolution in vertical sectors (such as industry, energy, and transport), which could lead to the updating and modernisation of communication, automation, and robotic control infrastructure, in which the advancement of systems and networks (already considering 6G) could be particularly important.

It is also important to consider the effort to adapt working models and the use of the physical spaces and buildings where ANACOM carries out its activity, with a view to promoting the articulation of new models of work organisation, with an increasing focus on remote working, which results in continuous investment with a view to consolidating and updating technological infrastructure and systems, and accelerating the ongoing digital transformation, with a positive impact on the organisation's efficiency. The need to adapt infrastructures and internal processes also takes into account their contribution to environmental sustainability.



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STRATEGIC GUIDELINES

## Strategic guidelines

Guided by principles that promote competition, investment, and innovation, thus fostering the emergence of better offers for consumers and companies, ANACOM has defined a three-year strategy with the aim of establishing a stable and predictable regulatory framework. To this end, the 2024-2026 multiannual activity plan will continue to be based on the following three strategic objectives:

### Objective 1

- To help ensure that the whole country gains the maximum benefit in terms of choice, price, quality and security of postal and electronic communications services, through active and demanding regulation that promotes efficient investment, facilitates the sharing of infrastructures and ensures fair and dynamic competition.

### Objective 2

- Ensure maximum protection of the rights of communications users, throughout the territory and especially among the most vulnerable populations, by promoting a regulatory framework that prioritises information and transparency and discourages and sanctions bad practices.

### Objective 3

- To strengthen and make regulation in Portugal more accountable, by fully respecting its autonomy, impartiality and independence and by demanding rigorous fulfilment of its mission, namely by sharing information and knowledge and promoting the efficiency and economy of means and resources that are indispensable to fully assuming its responsibilities.

These strategic objectives aim to strengthen the effectiveness of ANACOM's mission, which is essential for the sustained development of the communications sector, meeting the needs of all users and defending citizens' rights.



The **1st strategic objective** has been developed with a view to promoting competitive markets, with incentives for efficient investment and innovation, aimed at satisfying user needs, to the benefit of consumers and the economic fabric in general, in terms of choice, prices, quality, innovation and security of the services provided. In this respect, it encompasses all the activity carried out in the context of the review/transposition of the sector's regulatory framework, analyses of relevant markets and regulated wholesale offers, as well as the conditions of access to electronic communications networks and the postal network and telecommunications infrastructure in buildings and urbanisations, and infrastructure suitable for hosting electronic communications networks, including their security and resilience, which also includes the planning and management of public assets such as radio spectrum and numbering resources. This objective also covers the revision of Regulations and guidelines, namely on the security and integrity of electronic communications networks and services; the management and allocation of numbering resources; and portability; as well as the approval of the Regulation aimed at establishing rules for the use of geographic and mobile numbers in nomadic situations. This objective also includes drawing up the regulatory framework for satellite notification procedures via the Portuguese administration, as well as plans that reflect the sector's civil emergency planning policies; and a list of communications sector infrastructure with the potential to be designated as national critical infrastructure. This objective also includes contributing to the regulation and supervision of digital services and markets within the framework of European regulations and the responsibilities assigned to ANACOM, as well as ANACOM's legal duties as a space authority.

The **2nd strategic objective** includes all activity related to the protection of users' rights, including the regulation and supervision of matters such as the universal electronic communications service (broadband Internet access, including TSI) and the postal service (postal network density, quality of service and prices), DTT, coverage of mobile and broadband services, transparent consumer information, complaint handling, out-of-court settlement of consumer disputes, and the neutrality and quality of service of electronic communications networks. It also includes liaison between cybersecurity bodies and ANACOM, in the context of sharing information on (cyber)security threats and incidents, and supporting the promotion of digital literacy.

The **3rd strategic objective** reinforces the importance of autonomy, impartiality and independence as essential aspects of ANACOM's action, which are indispensable to the fulfilment of ANACOM's mission as a regulatory authority, including for space activities. The priority elements for achieving

this are sharing data and information, improving knowledge resources, and cultivating an economy of means essential to the complete discharge of its responsibilities.

Given the strategic objectives identified, and with a view to putting them into practice, taking into account the foreseeable implementation of the 2023 Plan and naturally without prejudice to other actions whose need/urgency may be identified during 2024, this Plan specifies a wide range of actions of a strategic nature, and it should be emphasised that some of them are, by their very nature, part of more than one strategic objective, and will be developed alongside activities of a recurring nature.

The image features a woman in profile on the left, looking towards the right. Her face is partially obscured by a network diagram of white nodes and lines. The background is a cityscape at night with illuminated buildings. A large white circle and a yellow line are overlaid on the scene. The text is in the top right corner.

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STRATEGIC ACTIONS

FOR 2024-2026

## Strategic actions for 2024-2026

Below is a complete list of the actions (numbered) in the 2024-2026 plan:

<b>Strategic Objective 1 - To help ensure that the whole country obtains the maximum benefit in terms of choice, price, quality, and security of postal and electronic communications services, through active and demanding regulation that promotes efficient investment, facilitates the sharing of infrastructure elements, and ensures fair and dynamic competition.</b>		
#	Action	Proposed deadline for implementation
1	Adopt regulatory measures, particularly with regard to the defence of users' rights, in the context of the Electronic Communications Law and Regulations applicable to the sector.	2024, 2025, 2026
2	Promote legislative and other measures to reduce the cost of deploying high-speed electronic communications networks	2024, 2025
3 (new action)	Reviewing Regulation 303/2019 of 1 April on the security and integrity of electronic communications networks and services	2024
4	Reviewing the prices and conditions of wholesale offers, in the context of indicating companies with Significant Market Power	2024, 2025, 2026
5	Planning and making spectrum available for various applications and services, including in the 700 MHz, 1500 MHz, and 26 GHz frequency bands	2024, 2025, 2026
6	Updating the regulatory framework applicable to radio licensing	2024
7 (new action)	Review the Portability Regulation	2024

8	Review the guidelines, principles and criteria for the management and allocation of numbering resources	2026
9 (new action)	Approve the Regulation aimed at establishing rules for the use of geographic and mobile numbers in nomadic situations	2024
10	Drawing up the regulatory framework for satellite notification procedures via the Portuguese administration	2025
11	Contribute to the regulation and supervision of digital services and markets within the framework of the responsibilities assigned to ANACOM	2024, 2025, 2026
12 (new action)	Support for CPEC's work in drawing up the sector's civil emergency planning policies	2026
13	Drawing up a list of communications sector infrastructure elements with the potential to be designated as national critical infrastructure elements	2026
<p><b>Strategic Objective 2 - Ensure maximum protection of the rights of communications users, throughout the territory and especially among the most vulnerable populations, by promoting a regulatory framework that prioritises information and transparency and discourages and sanctions bad practices.</b></p>		
<b>#</b>	<b>Action</b>	<b>Proposed deadline for implementation</b>
14	Monitor/supervise compliance with the new end-user protection rules resulting from the new Electronic Communications Law	2024
15	Adopt regulatory measures (namely in terms of prices, quality of service and postal network density) to ensure the provision of the Universal Postal Service	2024, 2025, 2026

16	Adopt measures related to broadband Internet access, within the scope of the Electronic Communications Universal Service, including TSI	2024, 2025, 2026
17 (new action)	Identify the different possible scenarios (with advantages and disadvantages) that would ensure free access to programme services currently distributed via DTT after 2030.	2026
18	Provide end users with an accredited tool (NET.mede) for measuring the quality of Internet service at an individual level	2024
19	Strengthen coordination between cybersecurity organisations and ANACOM, in order to share information on (cyber)security threats and incidents.	2026
20	Actively support the promotion of digital literacy, in cooperation with other national bodies	2024, 2025, 2026
21	Ensure compliance with all the rules and obligations of the security regulation relating to the security and integrity of electronic communications networks and services, based on the planned review of Regulation 303/2019 of 1 April on the security and integrity of electronic communications networks and services.	2024
22	Promote the necessary measures to ensure the existence of a tariff comparator in Portugal, in accordance with the rules of the Electronic Communications Law	2024
23	Monitor/supervise compliance with the new transparency rules laid down in the new Regulation on roaming on public mobile communications networks in the EU	2024
24	Implementing a knowledge platform aimed at supporting greater literacy among users of the services provided, in terms of access to the market	2024, 2025

25	Expanding intervention models in the context of consumer defence, in a context of collaboration between the sector, academia and other stakeholders	2025
26	Favouring the use of the national roaming service, particularly relevant in rural areas and in emergency situations.	2024
<p><b>Strategic Objective 3 - To strengthen and make regulation in Portugal more accountable by fully respecting its autonomy, impartiality, and independence and by demanding rigorous fulfilment of its mission, in particular by sharing information and knowledge and promoting the efficiency and economy of means and resources that are essential to fully assuming its responsibilities.</b></p>		
#	Action	Proposed deadline for implementation
27 (new action)	Developing the necessary actions within their sphere of competence related to emergency communications, namely defining caller location criteria for 112.	2024, 2025, 2026
28 (new action)	Creation of the CSIRT-ANACOM - ANACOM Security Incident Response Centre	2026
29 (new action)	Analysing methodology and carrying out supervisory actions under Article 62(6) of the ECL, as a result of determinations made by the Safety Assessment Commission	2024, 2025
30 (new action)	Carry out Supervision actions at Cable Landing Stations - CLS (focused on the resilience of the Stations)	2024, 2025, 2026
31	Promoting the international connectivity strategy within the framework of international organisations	2024, 2025

32	Ensure verification of mobile network coverage obligations	2024, 2025, 2026
33	Developing new approaches to supervising networks and services, particularly through new sensor systems	2024, 2025, 2026
34	Ensure the implementation and promotion, as the Space Authority (SA), of the national regulatory framework for space activities, enabling the first space activity licences to be awarded in Portugal	2024
35	Develop and implement a supervision plan to promote and guarantee compliance with obligations relating to the construction and expansion of suitable infrastructure	2024, 2025, 2026
36	Ensure ANACOM's participation in the BEREC vice-presidency	2024
37	Measuring the quality of service (QoS) of mobile networks, with a view to disseminating information to consumers and other users	2024, 2025, 2026
38	Making progress in digital transformation measures, implementing the new work process management system (workflows and document management) with the integration of A.I. (Artificial Intelligence) and RPA (robotisation of work processes) mechanisms.	2024, 2025
39	Providing an Information Platform for the market, with dynamic representation of statistical data, surveys, and studies on the sector	2024, 2025
40	Implementing the means to support the digital materialisation of the strategic observation matrix	2024



	for cross-sector innovation, particularly in terms of technology	
41	Upgrade and expand ANACOM's Laboratory and Standardisation Centre in order to establish new capacities	2024, 2025
42	Transformation of stakeholder relationship platforms in order to fully digitise them, increase efficiency and expand channels for this purpose (Single Digital Gateway)	2024
43	Implement, at ANACOM level, a wide-ranging digital skills training programme	2024, 2025, 2026
44	Promote and carry out activities related to security exercises.	2026
45 (new action)	Ensure active participation in defining the future European regulatory framework for postal services.	2024 2025, 2026
46 (new action)	Implementation of the Gender Equality and Diversity Plan	2024

These actions embody ANACOM's strategic objectives and promote the Sustainable Development Goals (SDGs) defined by the United Nations (UN) in 2015. Most of the SDGs have a clear resonance in ANACOM's strategic actions: all activities contribute to at least one SDG and of the 17 SDGs, 10 benefit from ANACOM's strategic guidelines for 2024-2026 (see *figure below*).

## ALIGNMENT OF ANACOM'S MULTIANNUL ACTIVITY PLAN WITH THE ODS (UN)





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GLOBAL INDICATORS

## Global indicators

In order to assess the efficiency, effectiveness, and quality achieved in pursuing its activity (Article 40(1) of ANACOM's Statutes), the following two main performance indicators will be considered in the 2024-2026 triennium:

**ID 1 - Execution of the Plan:** measures the number of actions fully accomplished in relation to the number of actions included in the plan (also allowing for any actions that may be added or removed).

**ID 2 - Percentage of decisions taken within the time limit set:** corresponds to the percentage of decisions taken within the time limit set by ANACOM.

The target for meeting these indicators will be 100 per cent in each year of the 2024-2026 triennium.



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HUMAN RESOURCES PLAN

## Human resources plan

In the context of constant adaptation to change in the strategic management of its human capital, in the 2024-2026 triennium ANACOM will maintain its focus on the continuous improvement of its performance, with the critical factor being investment in people, their potential, and in the appropriate training programmes, so that their motivation and performance are sustainably improved.

The dimensions of gender equality and diversity, which have been incorporated into ANACOM's management strategy in recent years, will continue to play an important role over the next three years through the adoption of initiatives that contribute to effective equality of treatment and opportunities between men and women, thus promoting non-discrimination based on gender and diversity in various areas of the regulator's internal operations.

Against the backdrop of the digital transformation that will be required of the regulator in the coming years, ANACOM will continue to progressively integrate new processes, competences, and management models, leveraged by a mix of information and communication technologies that will inevitably have an impact, among other things, on creating opportunities for learning and generating knowledge, as well as value.

The reformulation of people management policies will play a critical role in the organisation's strategy, guaranteeing the coherence and alignment of all employees, as well as their active and effective participation in achieving the defined objectives, and in the respective monitoring mechanisms, in which leaders will play an important role in activating organisational behaviours geared towards how the present and future work landscape should look and how teams should act.

Employee training and development strategies will remain highly relevant, by drafting skills development programmes geared towards regulation in the context of digital markets and services and access to platforms and tools that are increasingly personalised, flexible, and close to the critical skills associated with ANACOM's need for rapid response.

Attracting external and internal talent and identifying the internal potential that will sustain the organisation's future are also major challenges arising from the ongoing transformation process, which implies new ways of working based not only on flexibility, but also on trust, autonomy and humanising the organisation with a view to creating rich professional opportunities with added value for employees and the organisation, as well as creating initiatives that guarantee their physical well-being and mental health.

It will also be essential for ANACOM to implement monitoring strategies that promote the generational sharing of knowledge considered critical to its activity.

The main areas of intervention in the field of human resources are:

- The reformulation/updating of competence profiles and organisational functions in line with the new present and future challenges of the regulator's activity;
- The implementation of the initiatives established in the Plan for Gender Equality and Diversity in each of the areas of intervention, such as the organisational culture of gender equality, equal opportunities in employment and labour relations, and gender balance in reconciling professional, family, and personal life.
- The promotion of an organisational culture geared towards data analysis (data driven), the dematerialisation of processes and the sharing of information within a short time, in order to speed up and simplify daily management and support decision-making;
- Boosting application solutions to strengthen the organisation's digital transition, in particular by providing middle managers with an analytical platform for exploring data that includes a dashboard of people management indicators;
- Continuing to carry out recruitment processes with a view to preparing ANACOM for present and future needs, permanently ensuring rejuvenation, better adaptation of human resources to the challenges that arise at any given time and the sustainability of the organisation;
- The promotion of training and development programmes for each employee, aimed at acquiring new skills and updating functional (digital regulation, supervision, regulation, among others), digital, behavioural and management skills, namely through learning and sharing knowledge between ANACOM's areas, in line with its values and the organisation's strategic performance objectives;
- The furtherance of employees with a view to ensuring the continuity of ANACOM's critical functions, through the implementation of diagnostic, mentoring and coaching tools that enable their development and retention, always from a dynamic perspective and anticipating the role of the Authority and the challenges it faces;
- Boosting and consolidating the strategic alignment of employees with an organisational culture that is more open to innovation and change, using internal communication channels and interaction initiatives at all organisational levels;
- Promoting a policy of incentives and professional career development based on recognising the merit of employee performance;

- The development of cooperation between ANACOM and the scientific and technological community;
- Continued collaboration between ANACOM and the academic community, particularly through annual professional and curricular internship programmes, as well as the possibility of awarding research grants, with a view to developing and enhancing the skills of young people in transition to working life.

ANACOM also intends to maintain its participation in citizenship initiatives, with intervention in the social and environmental spheres.

With regard to building the capacity of its structure, in 2024 ANACOM intends to continue recruitment processes aimed at hiring higher management personnel, mostly juniors, with a view to rejuvenating the organisation and adapting it to the challenges ahead.

The rate at which these senior managers are hired will depend on the number of positions open at any given time, bearing in mind the planned ceiling of 423 ANACOM employees over the next three years.

This Authority will therefore comply with the rules laid down in its Statutes for the recruitment of workers, within the scope of its management autonomy (Article 42(3) of Decree-Law 39/2015 of 16 March), and those resulting from the Framework Law on independent administrative entities with functions of regulating economic activity in the private, public and cooperative sectors (Law 67/2013 of 28 August, in its current wording - Article 32(3)), as well as the procedures defined in the budgetary rules.



The image features a woman in profile on the left, her hand near her chin in a thoughtful pose. The background is a composite of a city skyline at night with illuminated buildings, overlaid with a white network diagram of interconnected nodes and lines. A large white circle and a yellow line are also present as graphic elements.

ANACOM MULTIANNUAL  
ACTIVITY PLAN  
2024-2026

FINANCIAL PLAN

FINANCIAL PLAN

## Financial plan

The financial plan continues the objective of optimising the effectiveness and efficiency of ANACOM's activity through the usual optimisation of spending and the definition of a careful investment policy, especially in terms of digital transformation, making it possible to ensure containment in terms of the regulatory fees applied to the sector, without neglecting the necessary means to act effectively as an independent regulator, taking into account the powers and responsibilities assigned to ANACOM, which result from the legal framework of the European Union and from national legislation.

ANACOM's Statutes, approved by Decree-Law 39/2015 of 16 March, state that this Authority is financially independent, endowed with the necessary and appropriate resources to carry out its duties, and that it has autonomy in terms of financial and asset management.

Public accounting rules and the regime for autonomous funds and services do not apply to ANACOM, with the exception of net profits from the use of assets in the public domain (e.g. radio spectrum), which must revert to the State, under terms to be defined by government decree.

The Statutes also enshrine the application of the State treasury regime, with ANACOM using the services of the Treasury and Public Debt Management Agency (IGCP).

It should also be noted that in 2022, following the publication of Administrative Rule 507/2023 of 27 September, the net profits for 2021, amounting to 32.5 million euros, were distributed, following the requirement set out in the Statutes. The net profits for 2022 have yet to be distributed.

In accordance with its Statutes, ANACOM's accounts are organised in accordance with the accounting standardisation system (SNC). The 2024 budget and the 2024-2026 financial plan show adequate financial resources for the necessary implementation of the activities set out in the 2024-2026 multiannual activity plan.

## 7.1. Budget 2024

- **Investment**

The overall investment plan for 2024-2026 (Annex II - Table 5) will be higher than in 2023, with a significant investment effort expected in improving ANACOM's infrastructure, as well as upgrading and renewing existing infrastructure.

The need for technical and technological adaptation of the supervision activity means that a large part of ANACOM's investment is allocated to updating and renewing the technical solutions available to the supervision teams, with emphasis on the planned investments not only in the acquisition of equipment and improvement of the support infrastructures for the radio spectrum monitoring and control centres (RSMCs), as well as the modernisation/reformulation of the image of the Barcarena RSMC, which may involve construction or refurbishment work in Barcarena to make up for the lack of space to accommodate the needs of the RSMC services and training requirements.

Investments related to improving the technological infrastructure of information systems are maintained, particularly with regard to improving and increasing the efficiency of ANACOM's platforms and work processes, as well as investment related to various updates to the radio emission remote control system (SINCRER) and the acquisition and development of systems aimed, in particular, at verifying the obligations imposed on operators, especially the new 5G networks.

As far as technological and information systems actions are concerned, it should be noted that the main investments planned are aimed at continuing the investments that have been made in the digital transformation, namely by improving electronic relationship systems with all stakeholders; improving the capabilities inherent in gathering information and increasing knowledge about the market and, at the same time, providing more and better information about the market to the various stakeholders (e.g. providers, investors, government); implementing new means aimed at consumer protection; and developing administrative simplification and integration projects, notably in the area of interoperability, as well as other investments aimed at increasing the internal efficiency of ANACOM's platforms and work processes.

These are the investments considered essential for this Authority to be able to keep up with the major changes taking place and expected in the communications sector and fulfil its functions and duties.

The amount of investment planned for 2024 is 6.5 million euros, corresponding to a negative variation of approximately 3 per cent in relation to the 2023 budget.

The most important spectrum projects/investments, in order of priority, to be highlighted in 2024 are:

- Implementation of an Automatic Spectrum Supervision System

Technological evolution and the growing use of electronic communications services based on mobile technologies have created ever greater challenges for spectrum supervision. Significant steps have already been taken to reduce dependence on human action in spectrum monitoring. However, it is considered that there is still a great deal of scope for developing and implementing a system that can automatically and continuously detect the existence of interference or technical anomalies that are harmful to the operation of communications networks and services, as well as any possible misuse of the radio spectrum. The aim is that the implementation of this system will be phased and that in future it will be possible to implement alarm systems that facilitate rapid intervention on the ground by ANACOM's technical teams.

- Technological retrofitting of Supervision Systems

ANACOM has several pieces of measuring equipment, some of which have already reached their end-of-life and are used on a daily basis in field actions by the spectrum supervision teams, which aggravates their wear and tear on the one hand and, on the other, emphasises the fact that they lack the most basic analysis and detection capabilities currently available. As such, the aim of this technological refit is to progressively replace all the equipment used by the technical teams, including, for example, the renewal of end-of-life DTT probes.

- Increasing the Capacity of the 5G Measurement System

This investment aims to increase ANACOM's technical capacity, specifically for testing, analysing, and reporting, to ensure verification of operators' obligations associated with the development of their 5G networks. The need to adapt existing resources to a scenario of multiple mobile communications networks was considered. This is an investment to be realised in stages between 2024 and 2026.

- Work on the antenna tower park at the Barcarena Supervision Centre

The Barcarena Supervision Centre has a unique set of antennas in Portugal with the capacity to receive frequencies between 10 kHz and 30 MHz, essentially supported by metal towers of various configurations and heights. This infrastructure has been in continuous operation since the 1960s and, although it has been the subject of various conservation actions, it now requires more in-depth maintenance. This investment is intended to ensure that ANACOM continues to have the capacity to monitor the spectrum in the Low Frequency (LF), Medium Frequency (MF) and High Frequency (HF) bands.

- Major repairs to Remote Supervision Stations (SINCRER)

SINCRER, a network of remote stations used for spectrum supervision, has been in full operation for more than 20 years, and some of its main components need to be reconditioned and replaced, despite the regular maintenance and upkeep that has been carried out.

The following projects are included in the context of improving relationship systems with all stakeholders, in order of priority:

- The adaptation of ANACOM's presence on the Internet, integrating new portals related to the Space context, Submarine Cables and ZLT;
- The transformation of the customer service and stakeholder relations function, integrating a new CRM platform and multichannel support, establishing alignment with the European regulatory initiative - Single Digital Gateway;
- The development of a set of technological instances of interoperability, in order to promote simplification and functional and administrative agility in the context of the various emerging needs (e.g. social Internet tariff, integrated management of litigation actions, data supply by providers);
- A Radio Knowledge Portal that integrates the digitisation of various components in this context, particularly amateur exams;
- A new Information and Statistics Portal, integrating new geospatial channels;
- The development of the SFAS (Supervision, Inspection and Sanctioning Action) application solution, with special emphasis on ensuring its interoperability with other entities;
- Improving the NET.mede platform;

- The creation of a new ANACOM Study Centre;
- The development of the Innovation programme and the establishment of partnerships in this context:
  - The implementation of new strategic layers of georeferenced information in ANACOM's new Geospatial Platform, supporting the need to collect and process information in this format, as well as making information available to the various interested parties that benefit from a geographic expression.
- With regard to projects to improve ANACOM's platforms and work processes, the following projects are internally focussed:
  - Completion of the new platform for managing work processes and documents (Workflow and Document Management), making greater use of Artificial Intelligence models and automation of work processes (RPA);
  - Implementation of a new model for the governance and democratisation of data and the respective technological platforms for exploitation, particularly with a view to integrating situations of data science and Artificial Intelligence;
  - Technological readjustment of the ANACOM Laboratory Centre with expansion of TEMPEST capacity;
  - Technological and procedural consolidation of the new work model in mobility and teleworking, integrating orientation with the Balanced Workplace concept;
  - Adaptation of the various vertical systems specific to ANACOM's work processes to new operating models integrating the cloud and remote working components.

- **Income**

The income budget for 2024 (Annex II - Table 6) is the result of applying the fees laid down in the various pieces of legislation in force. The final figures were calculated taking into account each type of service, and it should be noted that the income budget includes the following situations:

- (1) Administrative regulatory fees associated with electronic communications, which are based on the principle of cost orientation and therefore vary according to the value of the costs associated with electronic communications regulatory activities (they represent around 36.4 per cent of total income);

- (2) Fees associated with the use of spectrum frequencies (accounting for 59 per cent of total income), which reflect the occupation/use of a scarce public asset that must be occupied and used efficiently, and are based on the occupant-payer concept;
- (3) Administrative regulatory fees associated with postal services, which are based on the principle of cost orientation and therefore vary according to the value of the costs related to postal service regulatory activities (they represent 2.3 per cent of total income);
- (4) Fees linked to the use of numbers (representing 1.4% of total income);
- (5) Other fees and income of a different nature, namely fines and surcharges, testing and calibration of equipment belonging to public and private organisations in ANACOM's laboratories, among others (representing 0.9 per cent of total income).

The legal framework for the fees provided for in the 2024 budget is as follows:

- Fees arising from the Electronic Communications Law, which refer to:
  - Issuance of declarations proving rights issued by ANACOM relating to the exercise of the activity of provider of electronic communications networks and services, allocation of rights of use for frequencies and allocation of numbers;
  - Exercise of the activity of provider of publicly available electronic communications networks and services;
  - Use of frequencies;
  - Use of numbers.

The legislation that supports the application of these fees and the corresponding tariff scheme is as follows:

- Law 16/2022 of 16 August (LCE), which establishes the legal framework applicable to electronic communications networks and services, related resources and services, the management of radio spectrum and numbering resources, as well as certain aspects of terminal equipment, and defines the powers of the national regulatory authority (NRA) and other competent authorities in these areas.
- Decree-Law 264/2009 of 28 September, which establishes the regime applicable to the licensing of radiocommunications networks and stations and the supervision of the infrastructure of these stations and the use of the radio spectrum, as well as the sharing of radiocommunications infrastructure;
- Administrative Rule 1473-B/2008 of 17 December, as amended.

Fees relating to the activity of postal service operators - the legislation governing these fees is as follows:

- Law 17/2012 of 26 April - establishes the regime for access to and exercise of the activity of provider of postal services operated in competition, in its current wording;
- Administrative Rule 1473-B/2008 of 17 December, as amended.
- Other taxes - due to their importance, the following regulations are mentioned:
  - Fees for the use of the amateur radio service - Decree-Law 53/2009 of 2 March, establishes the regime for the use of the amateur radio service, and Administrative Rule 1473-B/2008 of 17 December, as amended by Administrative Rule 296-A/2013 of 2 October, establishes the respective fees to be charged;
  - Fees for access to and exercise of audiotext service providers - Decree-Law 177/1999 of 21 May, sets out the access regime and Administrative Rule 567/2009 of 27 May, establishes the respective fees to be charged.
- Other services and other income:
  - Equipment testing and calibration - the amounts included under these headings refer to services provided by ANACOM within the scope of the functions assigned to it and result from the application of the specific tariff scheme set by the Board of Directors (BoD);
  - Inspection actions - this heading includes income from inspection actions, namely fines imposed and inspections carried out, the amounts of which are set by the Board of Directors;
  - Surcharges - applied in accordance with current legislation;
  - Interest and other similar income - this heading basically includes interest on late payments of invoices issued by ANACOM at the legally stipulated interest rate;
  - EU subsidies - these amounts refer to travelling to meetings and conferences within the EU, in accordance with the tasks assigned to ANACOM, in cases where travel expenses are reimbursed;
  - Other - This heading includes small and occasional income and gains, namely those resulting from the sale of scrap metal, the disposal of goods, among others, as well as extraordinary income and gains associated with accounting regularisations.



In the 2024 budget, income is expected to reach 122.6 million euros, which is higher than the income forecast in the 2023 budget (5.1 million euros more), due to the combination of the following effects:

- An increase of around +3 million euros in administrative fees for the regulation of electronic communications, mainly due to the increase in provisions for legal proceedings, the amount of which forecast for 2024 took into account the prospects for the evolution of legal proceedings;
- An increase of 1.9 million euros in frequency usage fees due to the increase in fixed telephone service fees;
- Increase in other income, totalling +0.20 million euros.

- **Expenses**

The 2024 spending budget (Annex II - Table 7) shows an increase of 30 per cent compared to the 2023 budget. The variations in 2024 compared to the budget in 2023 are mainly due to the need for budgeting, as a precautionary measure, a sum of 18 million for the payment of interest on disputes over regulatory fees, which it is estimated may have an unfavourable outcome for ANACOM in 2024, with an impact on the use of provisions and the respective interest.

Also noteworthy is the increase in provisions for ongoing legal proceedings.

A sum of around 1 million euros has also been budgeted under this heading, relating to the estimated compensation for the costs associated with the release of the 700 MHz band, which should take place in 2024, given that, according to Article 4(6) of Decree-Law 151-A/2000, "the costs arising from this compensation shall be borne by funds from ANACOM's budget".

In 2024, 12.3 million euros were budgeted for external supplies and services, which translates into a reduction of 405,000 euros, 3.2 per cent less than the budgeted figure for 2023 (Annex II - table 7), with the variations for 2025 and 2026 showing residual figures compared to the same periods of the previous year.

Of particular note were the substantial decreases in the "Specialised work" headings, due to the use of ANACOM's human resources rather than external entities, and in the "Energy and fluids" heading, due to the fall in energy prices.

There were also increases, which took into account the evolution of the national minimum wage or inflation, in the items "Surveillance and security", "Cleaning, hygiene and comfort" and "Rents and leases", which comply with legal requirements.

Also noteworthy were the increases in the "Advertising and publicity" item, justified by the need to carry out one-off publicity initiatives, as well as in the "Maintenance and repair" item, particularly regarding computer equipment.

With regard to staff costs, the figure provided for in the 2024 budget (Annex II - table 8) includes the staff approved by the Board of Directors, which is identical to that of 2023 (423 employees) and reflects the costs of the salary updates planned for 2024, as well as the possible development of formal negotiations with the unions that ANACOM is considering with a view to revising the Collective Labour Regulation Agreement (CLRA) and also the increase resulting from regular and automatic career progressions and extraordinary progressions, in strict compliance with the applicable legal framework. Personnel costs will reach 32.5 million euros in 2024, which is 3.3 per cent more than the 2023 budget.

The main asset of a regulatory body like ANACOM is its people, and it is normal for personnel costs to be the largest part of the cost structure, the main components of which are:

- The remuneration of the governing bodies;
- The remuneration of ANACOM staff and additional remuneration for 2024;
- Charges on ANACOM's account remuneration, which reflect the Social Security contribution made through the application of the single social rate (TSU) and the contribution to the *Caixa Geral de Aposentações (CGA)*;
- Post-employment benefits, which include the Authority's contribution to the Pension Fund for the payment of retirement pensions to a group of workers who are CGA subscribers and the responsibilities relating to healthcare to be enjoyed by those same workers;
- Occupational accident insurance, which is extended to all employees;

- Social action costs, namely the costs arising from the agreements signed with the entities providing occupational health services, within the scope of disease prevention, hygiene and safety at work, the costs incurred with the health insurance provided to ANACOM's employees, as well as all the others provided for in the eventual negotiation of the ARCT;
- The amount associated with training actions of various kinds, an activity considered key for upskilling, updating, and training ANACOM employees, in an increasingly complex and demanding sectoral environment.

In the 2024 budget, depreciation and amortisation costs remained at 3 million euros, as did the 120,000 euros planned for impairment losses on receivables.

Also maintained for 2024 is the criterion used in the previous Plan in terms of estimating provisions for ongoing legal proceedings, which translates into an increase in provisions of 3.4 million euros, from 23.6 million euros (in the 2023 budget) to 27 million euros (in the 2024 budget). The criterion consists of starting from the real values existing at the end of 2022 (existing lawsuits) and projecting any new lawsuits that may occur in 2023 and 2024, according to the history of challenges, to which the accounting policies in force apply, which are generally as follows:

- With regard to the amounts requested in legal actions relating to challenges to regulatory acts, the provision is estimated according to the higher or lower estimate of risk;
- With regard to lawsuits involving claims for frequency usage fees, the provision corresponds to 100 per cent of the amount claimed and/or owed;
- With regard to the amounts claimed in assessments relating to administrative regulation fees, given the specific nature of this type of challenge, it is considered that the provision should cover the entire amount claimed within a period of 4 years, after which the statute of limitations expires and it is impossible to recover fees assessed under the terms of the General Tax Law.

Lastly, other costs and losses totalled 28.5 million euros in the 2024 budget, higher than the amount budgeted for 2023 (+19.8 million euros).

This increase, as mentioned above, is the result of budgeting a sum of 18 million to pay any potential compensatory interest on litigation over regulatory fees.

A sum of 1 million euros has also been budgeted under this heading to pay compensation for the costs associated with freeing up the 700 MHz band.

As a result, the total costs planned for 2024 amount to 103.4 million euros, 30 per cent higher than those budgeted for 2023.

It should also be noted that the 2023 spending budget was drawn up on the assumption that the effects of the war in Ukraine and the Middle East will be residual and will not affect the normal functioning of ANACOM, whose activity will continue uninterrupted on a mixed face-to-face and teleworking basis. For this reason, it has been predicted that the possible impact on the spending budget of any health measures that may be necessary will be reduced, a situation that is in any case accommodated in the budget.

- **Results**

Based on the above estimates, the net profit forecast in the 2024 budget will amount to 19.1 million euros (-49.4 per cent compared to the 2023 budget), as shown in Annex II - table 9.

## **7.2 Financial plan 2024-2026**

The parts that make up ANACOM's financial plan for the three-year period 2024-2026 are set out in Annex II and are as follows:

- Investment plan (by project);
- Income plan;
- Spending plan;
- Income statement by nature;
- Cash budgets;
- Balance sheets;
- Cash flow statement.

The remaining accounting and financial statements are also presented, drawn up on the basis of the income, expenses and investments already explained, with the SNC accounting criteria used by ANACOM and accepted by the auditors having been maintained in their preparation. It should also be noted that in drawing up the balance sheet, profit and loss account and other financial documents, it was assumed that the Administrative Rules implementing the results would be published in the year following that to which the results relate. Finally, the implementation of the "Accounting Standardisation System for Public Administrations - SNC-AP" will continue in 2024.



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ANNEXES

## Annex I - Strategic people plan (tables)

**Table 1 - Changes in ANACOM human resources**

Name	2024	2025	2026
1 - Senior management	332	332	332
2 - Non-management	91	91	91
<b>Total staff (1+2)</b>	<b>423</b>	<b>423</b>	<b>423</b>

Unit: Number of Workers

**Table 2 - Evolution of complementary forms of labour**

Name	2024	2025	2026
Overtime	5 525	5 525	5 525
<b>Total</b>	<b>5 525</b>	<b>5 525</b>	<b>5 525</b>

Unit: Hours

**Table 3 - Changes in personnel costs**

Name	2024	2025	2026
Remuneration and charges	29 524 000	30 464 717	31 443 460
Other personnel costs	3 008 670	3 075 425	3 144 148
<b>Total</b>	<b>32 532 670</b>	<b>33 540 142</b>	<b>34 587 608</b>

Unit: Euros

**Table 4 - Personnel spending plan**

<b>Name</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
1. Permanent staff (end of year)	423	423	423
2. Effective labour potential (1800 hours/year)	761 400	761 400	761 400
3. Overtime (hours)	5 525	5 525	5 525
<b>4. Labour potential (2 to 3)</b>	<b>766 925</b>	<b>766 925</b>	<b>766 925</b>
5. Remuneration of governing bodies	811 572	811 573	811 573
6. Staff remuneration	19 419 072	20 124 373	20 855 290
7. Additional remuneration	4 226 567	4 300 540	4 375 801
8. Post-employment benefits	1 257 811	1 299 264	1 342 148
9. Charges on remuneration	5 066 789	5 228 231	5 400 796
10. Occupational accident insurance	115 271	119 070	123 000
11. Social action spending	1 072 084	1 093 587	1 115 496
12. Other personnel costs	563 504	563 504	563 504
<b>13.Total (5 to 12)</b>	<b>32 532 670</b>	<b>33 540 142</b>	<b>34 587 608</b>

Unit: Euros



## ANNEX II - 2024 budget

**Table 5 - Investment**

Name	2024 budget	2023 budget	Variation 2024/2023	
			Value	%
Land and Buildings	751 000	504 000	247 000	49,0%
Basic equipment	1 530 000	1 305 000	225 000	17,2%
Transport equipment	40 000	142 000	-102 000	-71,8%
Administrative equipment				
* Computer equipment (hardware)	40 000	42 500	-2 500	-5,9%
* Other miscellaneous equipment	451 500	1 435 000	-983 500	-68,5%
Computer programmes (Software)	3 544 930	2 750 000	794 930	28,9%
Adaptation of Facilities	159 900	530 000	-370 100	-69,8%
<b>Total</b>	<b>6 517 330</b>	<b>6 708 500</b>	<b>-191 170</b>	<b>-2,8%</b>

Unit: Euros.

**Table 6 - Income**

Name	2024 budget	2023 budget	Variation 2024/2023	
			Value	%
<b>Electronic communications regulation activity</b>	<b>118 648 532</b>	<b>113 672 570</b>	<b>4 975 962</b>	<b>4,4%</b>
* Declaration attesting rights	12 000	12 000	0	0,0%
* Electronic commerce activity	44 610 000	41 550 000	3 060 000	7,4%
* Use of frequencies - SCET	61 299 080	61 299 080	0	0,0%
* Use of frequencies - other	11 049 452	9 181 490	1 867 962	20,3%
* Use of numbers	1 678 000	1 630 000	48 000	2,9%
<b>Postal services regulation activity</b>	<b>2 852 400</b>	<b>2 852 400</b>	<b>0</b>	<b>0,0%</b>
<b>Fines paid</b>	<b>650 000</b>	<b>500 000</b>	<b>150 000</b>	<b>30,0%</b>
<b>Other services provided</b>	<b>235 900</b>	<b>201 100</b>	<b>34 800</b>	<b>17,3%</b>
<b>Interest and other similar income</b>	<b>55 000</b>	<b>55 000</b>	<b>0</b>	<b>0,0%</b>
<b>Other income</b>	<b>126 000</b>	<b>150 000</b>	<b>-24 000</b>	<b>-16,0%</b>
<b>Total</b>	<b>122 567 832</b>	<b>117 431 070</b>	<b>5 136 762</b>	<b>4,4%</b>

Unit: Euros.

**Table 7 - Expenditure**

Name	2024 budget	2023 budget	Variation 2024/2023		Real 2022
			Value	%	
<b>External supplies and services</b>	<b>12 299 828</b>	<b>12 704 985</b>	<b>-405 157</b>	<b>-3,2%</b>	<b>9 168 779</b>
* Specialised work	3 111 844	3 998 978	-887 134	-22,2%	1 948 427
* Advertising	540 000	290 000	250 000	86,2%	85 772
* Surveillance and security	652 000	641 204	10 796	1,7%	568 642
* Maintenance and repair	2 317 000	2 084 000	233 000	11,2%	2 172 945
* Books and technical documentation	202 200	201 000	1 200	0,6%	142 251
* Energy and fluids	579 200	1 007 100	-427 900	-42,5%	710 213
* Travel, accommodation, and transport	798 993	667 943	131 050	19,6%	389 992
* Rents and leases	2 277 000	2 238 500	38 500	1,7%	1 951 418
* Communication	413 000	413 000	0	0,0%	342 305
* Insurance	103 800	102 300	1 500	1,5%	77 686
* Cleaning, hygiene, and comfort	384 591	375 140	9 451	2,5%	294 317
* Other supplies and services	920 200	685 820	234 380	34,2%	484 811
<b>Personnel costs</b>	<b>32 532 670</b>	<b>31 485 800</b>	<b>1 046 870</b>	<b>3,3%</b>	<b>24 881 034</b>
* Remuneration and charges	29 524 000	29 031 751	492 249	1,7%	23 281 097
* Other personnel costs	3 008 670	2 454 049	554 621	22,6%	1 599 937
<b>Depreciation and amortisation costs</b>	<b>3 000 000</b>	<b>3 000 000</b>	<b>0</b>	<b>0,0%</b>	<b>3 161 706</b>
<b>Impairment losses</b>	<b>120 000</b>	<b>120 000</b>	<b>0</b>	<b>0,0%</b>	<b>3 934 760</b>
<b>Provisions for the year</b>	<b>26 925 600</b>	<b>23 550 600</b>	<b>3 375 000</b>	<b>14,3%</b>	<b>18 091 641</b>

<b>Other expenses</b>	<b>28 496 183</b>	<b>8 661 538</b>	<b>19 834 645</b>	<b>229,0%</b>	<b>8 321 184</b>
* Subscriptions	684 850	767 180	-82 330	-10,7%	644 372
* Meetings and conferences	421 970	431 000	-9 030	-2,1%	161 648
* Sponsorships	100 000	200 000	-100 000	-50,0%	25 390
* Participations/Transfers	7 939 922	7 027 144	912 778	13,0%	6 757 832
* Cooperation	146 500	124 914	21 586	17,3%	83 067
* Other expenses	19 202 941	111 300	19 091 641	17153,3%	648 875
<b>Total</b>	<b>103 374 281</b>	<b>79 522 923</b>	<b>23 851 358</b>	<b>30,0%</b>	<b>67 559 104</b>

Unit: Euros.

**Table 8 - Personnel costs budget**

Name	2024 budget	2023 budget	Variation 2024/2023	
			Value	%
1. Permanent staff (end of year)	423	423	0	0,0%
2. Effective labour potential (1800 hours/year)	761 400	761 400	0	0,0%
3. Overtime (hours)	5 525	5 056	469	9,3%
<b>4. Labour potential (2 to 3)</b>	<b>766 925</b>	<b>766 456</b>	469	0,1%
5. Remuneration of governing bodies	811 572	848 628	-37 056	-4,4%
6. Personnel remuneration	19 419 072	18 704 230	714 842	3,8%
7. Additional remuneration	4 226 567	4 530 592	-304 025	-6,7%
8. Post-employment benefits	1 257 811	961 768	296 043	30,8%
9. Charges on remuneration	5 066 789	4 948 301	118 488	2,4%
10. Labour accident insurance	115 271	113 601	1 670	1,5%
11. Social action spending	1 072 084	815 176	256 908	31,5%
12. Other personnel costs	563 504	563 504	0	0,0%
<b>Total (5 to 12)</b>	<b>32 532 670</b>	<b>31 485 800</b>	<b>1 046 870</b>	<b>3,3%</b>

Unit: Euros.

**Table 9 - Income and expenditure budget**

Name	2024 budget	2023 budget	Variation 2024/2023	
			Value	%
<b>INCOME</b>				
* Fees for electronic communications activity	44 610 000	41 550 000	3 060 000	7,4%
* Fees for use of frequencies	72 348 532	70 480 570	1 867 962	2,7%
* Fees for use of numbers	1 678 000	1 630 000	48 000	2,9%
* Fees for postal service regulation activity	2 852 400	2 852 400	0	0,0%
* Other services rendered	897 900	713 100	184 800	25,9%
* Interest and similar income earned	55 000	55 000	0	0,0%
* Other income and gains	126 000	150 000	-24 000	-16,0%
<b>Total income</b>	<b>122 567 832</b>	<b>117 431 070</b>	<b>5 136 762</b>	<b>4,4%</b>
<b>EXPENDITURE</b>				
* External supplies and services	12 299 828	12 704 985	-405 157	-3,2%
* Personnel costs	32 532 670	31 485 800	1 046 870	3,3%
* Depreciation and amortisation costs	3 000 000	3 000 000	0	0,0%

* Impairment losses	120 000	120 000	0	0,0%
* Provisions for the year	26 925 600	23 550 600	3 375 000	14,3%
* Other expenses and losses	28 496 183	8 661 538	19 834 645	229,0%
<b>Total expenditure</b>	<b>103 374 281</b>	<b>79 522 923</b>	<b>23 851 358</b>	<b>30,0%</b>
<b>Net profit for the period</b>	<b>19 193 551</b>	<b>37 908 147</b>	<b>-18 714 596</b>	<b>-49,4%</b>

Unit: Euros.

**Table 10 - Investment plan (by project)**

<b>Name</b>	<b>Objectives</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
Technological retrofitting of spectrum monitoring	Upgrade and renovation of existing spectrum monitoring and control (SMC) infrastructure and implementation of an Automatic Spectrum Supervision System	680 000	830 000	830 000
Major repairs and upgrades to SINCRER	Various updates to the radio emissions remote control system	90 000	90 000	90 000
Redesigning / modernising the image of the CMCE - National Supervision Centre (CNS) Barcarena	Acquisition of equipment and improvement of support infrastructures for radio spectrum monitoring and control centres	520 000	320 000	320 000
Equipment for 5G	Test system for 5G	190 000	190 000	190 000
External expression systems programme	Set of initiatives aimed at implementing and improving electronic customer relationship systems with stakeholders	1 750 000	1 600 000	1 400 000
Systems programme for internal processes and platforms	Set of initiatives aimed at improving and increasing the efficiency of ANACOM's platforms and work processes	1 019 000	1 000 000	1 000 000
Infrastructure systems programme	A set of initiatives aimed at providing ANACOM's technological architecture with the necessary capacity for its activity	755 930	500 000	500 000
Purchase of various computer equipment	Acquisition of current hardware and software	335 000	335 000	160 000
Renovation of spaces/buildings	Updating SMC centres and improving working conditions	721 400	471 400	346 400
Miscellaneous current purchases	Adaptation and improvements to ANACOM's various facilities, acquisition of administrative equipment.	456 000	396 000	396 000
<b>Total</b>		<b>6 517 330</b>	<b>5 732 400</b>	<b>5 232 400</b>

Unit: Euros



**Table 11 - Income plan**

<b>Name</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
<b>Electronic communications</b>	<b>118 648 532</b>	<b>120 753 532</b>	<b>122 413 532</b>
* Declaration attesting rights	12 000	12 000	12 000
* Electronic communications activity	44 610 000	46 715 000	48 375 000
* Use of frequencies - SCET	61 299 080	61 299 080	61 299 080
* Use of frequencies - other	11 049 452	11 049 452	11 049 452
* Use of numbers	1 678 000	1 678 000	1 678 000
<b>Exercise of postal services activity</b>	<b>2 852 400</b>	<b>2 952 400</b>	<b>3 082 400</b>
<b>Other services provided</b>	<b>885 900</b>	<b>885 900</b>	<b>885 900</b>
<b>Interest and other similar income</b>	<b>55 000</b>	<b>55 000</b>	<b>55 000</b>
<b>Other income</b>	<b>126 000</b>	<b>126 000</b>	<b>126 000</b>
<b>TOTAL</b>	<b>122 567 832</b>	<b>124 772 832</b>	<b>126 562 832</b>

Unit: Euros

**Table 12 - Spending plan**

Name	2024	2025	2026
<b>External supplies and services</b>	<b>12 299 828</b>	<b>12 282 983</b>	<b>12 285 855</b>
* Specialised work	3 111 844	3 049 607	2 988 591
* Advertising	540 000	540 000	540 000
* Surveillance and security	652 000	694 151	733 067
* Maintenance and repair	2 317 000	2 297 000	2 297 000
* Books and technical documentation	202 200	202 150	202 043
* Energy and fluids	579 200	578 900	578 900
* Travel, accommodation, and transport	798 993	786 063	773 516
* Rents and leases	2 277 000	2 294 250	2 311 673
* Communication	413 000	413 000	413 000
* Insurance	103 800	103 800	103 800
* Cleaning, hygiene, and comfort	384 591	403 862	424 065
* Other supplies and services	920 200	920 200	920 200
<b>Personnel costs</b>	<b>32 532 670</b>	<b>33 540 142</b>	<b>34 587 608</b>
* Remuneration and charges	29 524 000	30 464 717	31 443 460
* Other personnel costs	3 008 670	3 075 425	3 144 148
<b>Depreciation and amortisation costs</b>	<b>3 000 000</b>	<b>2 500 000</b>	<b>2 500 000</b>
<b>Impairment losses</b>	<b>120 000</b>	<b>120 000</b>	<b>120 000</b>
<b>Provisions for the year</b>	<b>26 925 600</b>	<b>26 470 000</b>	<b>27 021 000</b>
<b>Other expenses</b>	<b>28 496 183</b>	<b>28 807 952</b>	<b>29 121 113</b>
* Subscriptions	684 850	684 650	684 650
* Meetings and conferences	421 970	421 970	421 970
* Sponsorships	100 000	100 000	100 000
* Participations/Transfers	7 939 922	8 251 891	8 565 052

* Cooperation	146 500	146 500	146 500
* Other expenses	19 202 941	19 202 941	19 202 941
<b>TOTAL</b>	<b>103 374 281</b>	<b>103 721 077</b>	<b>105 635 576</b>

Unit: Euros

**Table 13 - Income statement by nature**

Name	2024	2025	2026
<b>Income and expenses</b>			
* Fees for electronic communications activity	44 610 000	46 715 000	48 375 000
* Fees for use of frequencies	72 348 532	72 348 532	72 348 532
* Fees for use of numbers	1 678 000	1 678 000	1 678 000
* Fees for postal services activity	2 852 400	2 952 400	3 082 400
* Other services provided	897 900	897 900	897 900
* External supplies and services	-12 299 828	-12 282 983	-12 285 855
* Personnel costs	-32 532 670	-33 540 142	-34 587 608
* Impairment losses	-120 000	-120 000	-120 000
* Provisions for the year	-26 925 600	-26 470 000	-27 021 000
* Other income and gains	<b>126 000</b>	<b>126 000</b>	<b>126 000</b>
* Other expenses and losses	-28 496 183	-28 807 952	-29 121 113
<b>Income before depreciation and amortisation</b>	<b>22 138 551</b>	<b>23 496 755</b>	<b>23 372 256</b>
* Depreciation and amortisation expenses/reversals	-3 000 000	-2 500 000	-2 500 000
<b>Operating profit</b>	<b>19 138 551</b>	<b>20 996 755</b>	<b>20 872 256</b>

* Interest and similar income earned	55 000	55 000	55 000
<b>NET PROFIT FOR THE YEAR</b>	<b>19 193 551</b>	<b>21 051 755</b>	<b>20 927 256</b>

Unit: Euros

**Table 14 - Cash budget**

<b>Name</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
<b>Previous year's balance</b>	<b>297 851 198</b>	<b>282 757 067</b>	<b>326 193 632</b>
Cash Receipts			
* Operating income	140 512 832	142 717 832	144 507 832
* Interest and other similar income	55 000	55 000	55 000
<b>Total receipts</b>	<b>140 567 832</b>	<b>142 772 832</b>	<b>144 562 832</b>
Payments			
* Investment	6 517 330	5 732 400	5 232 400
* Operation	113 328 681	74 631 077	75 994 576
* Application of results	35 815 952	18 972 790	20 645 188
<b>Total payments</b>	<b>155 661 963</b>	<b>99 336 267</b>	<b>101 872 164</b>
<b>Cash and bank deposits</b>	<b>282 757 067</b>	<b>326 193 632</b>	<b>368 884 300</b>

Unit: Euros

**Table 15 - Balance Sheet**

Name	2024	2025	2026
<b>Assets</b>			
<b>Non-current assets</b>	<b>23 309 731</b>	<b>26 382 231</b>	<b>28 954 731</b>
* Tangible fixed assets	16 286 707	17 114 207	17 641 707
* Intangible assets	7 022 974	9 267 974	11 312 974
* Other receivables	50	50	50
<b>Current assets</b>	<b>398 528 067</b>	<b>441 914 632</b>	<b>484 555 300</b>
* Customers	1 000 000	1 000 000	1 000 000
* Other receivables	113 571 000	113 571 000	113 571 000
* Deferrals	1 200 000	1 150 000	1 100 000
* Cash and bank deposits	282 757 067	326 193 632	368 884 300
<b>Total assets</b>	<b>421 837 798</b>	<b>468 296 863</b>	<b>513 510 031</b>
<b>Equity and liabilities</b>			
<b>Equity</b>	<b>96 293 499</b>	<b>98 372 465</b>	<b>98 654 533</b>
* Other reserves	67 619 630	67 840 391	68 246 958
* Retained Earnings	3 035 000	3 035 000	3 035 000
* Other Changes in Equity	6 445 319	6 445 319	6 445 319
* Net profit for the period	19 193 551	21 051 755	20 927 256
<b>Liability</b>	<b>325 544 299</b>	<b>369 924 399</b>	<b>414 855 499</b>
* Provisions	178 638 232	205 108 232	232 129 232
* Liabilities for post-employment benefits	9 178 155	9 178 155	9 178 155

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* Suppliers/State	1 307 839	19 217 939	37 128 039
* Other accounts payable	136 420 073	136 420 073	136 420 073
<b>Total liabilities + Equity</b>	<b>421 837 798</b>	<b>468 296 863</b>	<b>513 510 031</b>

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Unit: Euros



**Table 16 - Cash flow statement**

<b>Name</b>	<b>2024</b>	<b>2025</b>	<b>2026</b>
<b>Cash flows - Operating activities</b>			
* Receipts from customers	122 386 832	124 591 832	126 381 832
* Payments to suppliers	-12 459 728	-12 442 883	-12 445 755
* Payments to staff	-32 532 670	-33 540 142	-34 587 608
<b>Cash generated by operations</b>	<b>77 394 434</b>	<b>78 608 807</b>	<b>79 348 469</b>
* Other receipts/payments	-86 187 135	-29 655 742	-31 641 301
<b>Cash flows from operating activities</b>	<b>-8 792 701</b>	<b>48 953 065</b>	<b>47 707 168</b>
<b>Cash flows - Investment activities</b>			
<b>Payments relating to:</b>			
* Tangible fixed assets	-2 812 500	-2 452 500	-2 152 500
* Intangible assets	-3 544 930	-3 120 000	-2 920 000
<b>Cash receipts arising from:</b>			
* Tangible fixed assets	1 000	1 000	1 000
* Interest and similar income	55 000	55 000	55 000
<b>Cash flows from investing activities</b>	<b>-6 301 430</b>	<b>-5 516 500</b>	<b>-5 016 500</b>
<b>Change in cash and cash equivalents</b>	<b>-15 094 131</b>	<b>43 436 565</b>	<b>42 690 668</b>
<b>Cash and cash equivalents at the beginning of the period</b>	<b>297 851 198</b>	<b>282 757 067</b>	<b>326 193 632</b>

<b>Cash and cash equivalents at the end of the period</b>	<b>282 757 067</b>	<b>326 193 632</b>	<b>368 884 300</b>
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Unit: Euros

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