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MULTI-ANNUAL  
ACTIVITIES  
PLAN

**2020-2022**  
AND BUDGET  
**2020**

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ANACOM



AUTORIDADE  
NACIONAL  
DE COMUNICAÇÕES

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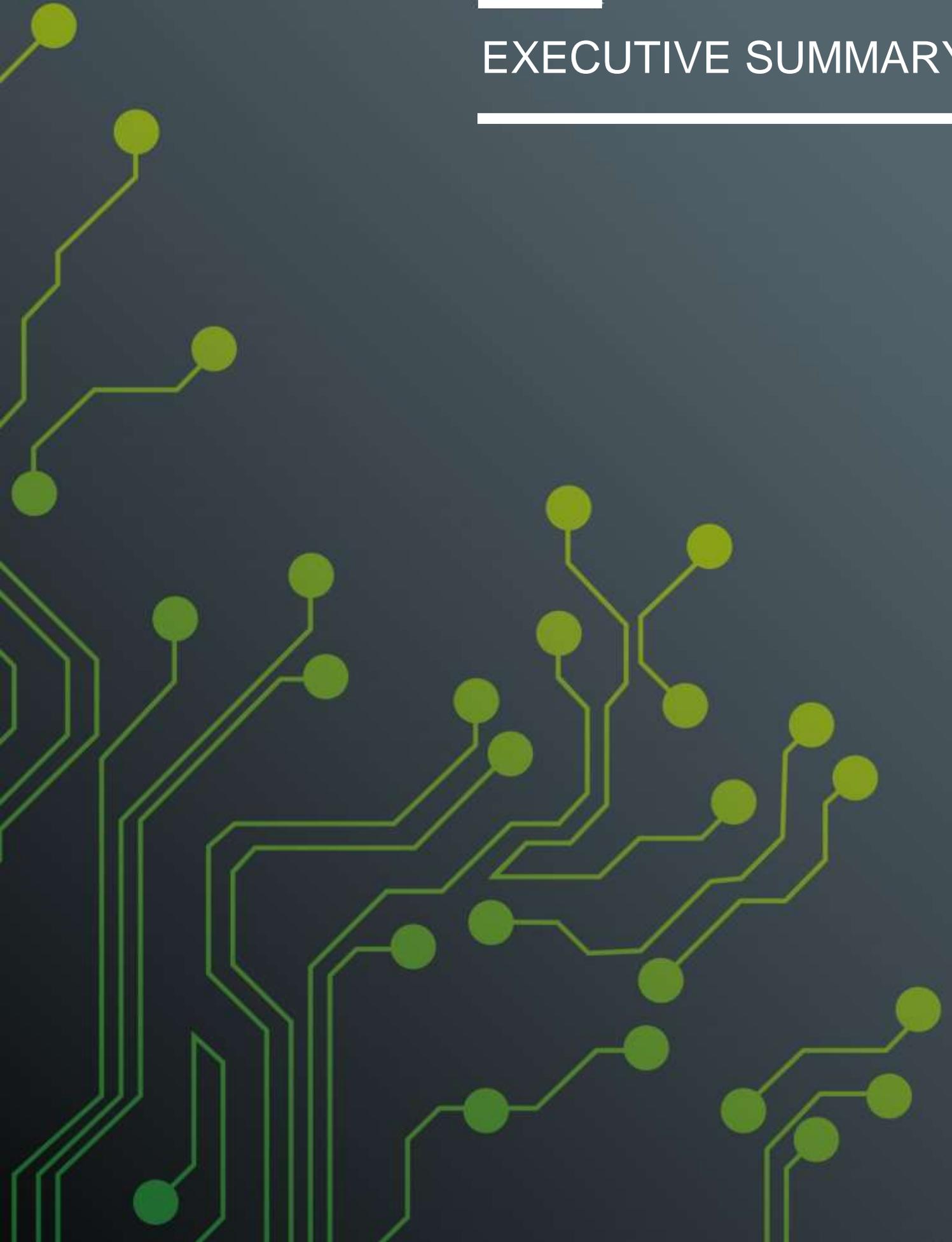
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# EXECUTIVE SUMMARY

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## 1. Executive summary

The Autoridade Nacional de Comunicações (ANACOM) defines its action strategy for a period of three years, which is publicly disclosed through the multi-annual activity plan, which integrates the strategic objectives for the three-year period and the main priorities that provide the framework for the actions to be taken in that period.

The strategic goals and the actions for the Plan were submitted to public consultation, a procedure which seeks to reinforce the transparency of its operations within the market, increase regulatory predictability and foster greater involvement of all stakeholders in the preparation of ANACOM's activity structure. The Plan now published, relating to 2020-2022, considers the contributions received, as outlined in the respective report, which is also being made available.

This Multi-Annual Activity Plan 2020-2022 outlines the strategic line of action for ANACOM for the next three-year period, which will focus on its capacity to contribute to enabling the country to obtain the maximum benefit in terms of choice, price, quality and security for postal services and electronic communications, through active and demanding regulation which boosts efficient investment, facilitates the sharing of infrastructure and ensures fair and dynamic competition, while at the same time promoting efficient management of the radio spectrum.

ANACOM will actively endeavour to ensure maximum protection of the rights of users of communications throughout the territory and, in particular, of the most vulnerable, through the promotion of a regulatory framework that gives priority to information and transparency and that discourages and sanctions bad practice.

It will also seek to strengthen and hold regulation in Portugal accountable, through full respect for its autonomy, neutrality and independence and the requirement to strictly fulfil its mission, namely through the sharing of information and knowledge and the promotion of efficiency and economy of means and resources indispensable for the full assumption of its responsibilities, namely those most recently assigned to it as a Space Authority.

In 2020, a new organisational structure, approved in 2019, will be implemented. This new structure seeks to improve the functioning of the organisation, making it more streamlined, dynamic and effective in the performance of its duties.

In this context, change management stands out as the main vector of activity, as a critical determining factor for the alignment, development and motivation of people and for the reinforcement of the organisational culture, through the communication of a common, comprehensive and integrated vision, in the which new management teams, in alignment with the Management Board, will play a decisive leadership role in pursuing ANACOM's strategic objectives.

This process also involves adapting ANACOM's human resources, which involves implementing recruitment processes with a view to hiring professionals with backgrounds that bolster ANACOM's ability to act under the ambit of fulfilling its mission.

On the financial side, this Authority maintains as a strategic priority the improvement of the efficiency of its activity and the rationalisation of expenses and investments, with the objective of ensuring progressive reductions in the regulatory fees applied to the sector, while at all times maintaining the means necessary for ANACOM to effectively perform its role as an independent regulator, in an increasingly demanding and complex scenario, taking into account the growing attributions and responsibilities it has been given.



# FRAMEWORK



## 2. Framework

As an independent administrative entity endowed with administrative, financial and management autonomy, as well as its own assets, ANACOM defines a strategy for the development of its activity for three years, which is reflected in strategic objectives established for the three-year period and operationalised through a multi-annual activity plan, which is subject to public consultation with respect to the main overarching strategic guidelines (Article 47, paragraph 1 of the Statutes of this Authority, as approved by Decree-Law 39/2015, of 16 March).

Prior submission to public consideration forms part of ANACOM's operating strategy, characterised by an enduring openness and willingness to listen to all interested parties. Based on this guiding principle, ANACOM has analysed all the contributions received during the consultation held, which were considered when preparing the Multi-Annual Activities Plan 2020-2022. By doing so, the aim is to act more effectively within the scope of the duties assigned to it by law.

This Authority will continue to be guided by high standards of quality, namely economic efficiency in its management and neutrality, rigour and transparency in its performance, using its powers of regulation, supervision, inspection and sanctioning, whenever necessary, appropriate and proportional. It is also ANACOM's intention to continue to organise regular meetings concerning topics relevant to the sector, to consult the interested parties and build solutions, in an open manner and in anticipation of the usual public consultation processes that precede its decisions.

The structure of the Plan for 2020-2022, which will be developed below, is based on:

- strategic objectives: established for the three-year period and considered to be of a structural nature for the fulfilment of ANACOM's duties;
- performance priorities: specific actions, or sets of actions, through which it contributes to the pursuit of the strategic objectives, within an annual or multi-annual time horizon.

In general terms, the activity to be continued in the 2020-2022 period will be framed by the aforementioned strategic objectives and ANACOM will pay due attention to, and take into account in its actions, the following aspects:

- The technological development of the sector, the modernisation of infrastructure, new solutions in terms of networks, services and terminal equipment and the ongoing changes in business models, in the structure of markets and in commercial offers. The rapid development of digital services requires a comprehensive but integrated view regarding the measures appropriate and necessary for overseeing this situation.
- The implementation of the new European regulatory and institutional framework, which results from Directive (EU) 2018/1972 of the European Parliament and of the Council, of 11 December, establishing the European Electronic Communications Code, the time limit for the transposition of which ends in December 2020. The new Code aims to respond to the growing connectivity needs of European citizens, to increase Europe's competitiveness and to stimulate investment in very high capacity networks. A significant range of issues related to the protection of the rights of consumers and other end-users and the strengthening of the powers of the Body of European Regulators for Electronic Communications (BEREC) are of particular importance.
- The developments led by the European Regulators Group for Postal Services (ERGP), whose action will have a particular impact on the process of revising the Postal Directive and on the implementation (and possible revision, during the three-year plan) of the EU Regulation on cross-border parcel delivery services (Regulation 2018/644, of 18 April 2018), which aims to increase price transparency and improve the regulatory oversight of those services.
- International initiatives, namely under the aegis of the International Telecommunication Union (ITU) and the Universal Postal Union (UPU), having an impact on the development of the communications sector on a global scale.
- Such commitments as may be established under the ambit of cooperation with the regulatory authorities of other countries, an area in which exchange and conciliation with the regulators of Portuguese-speaking countries are particularly important.
- The need for increased attention to aspects related to consumer protection, namely those associated with the application of that established in terms of billing

and complaints and the implementation of the Telecom Single Market (TSM) Regulation, which establishes measures regarding retail charges applied to regulated intra-European communications and the open Internet (network neutrality), in this case involving a continuous assessment of zero rating and similar offers and traffic management practices, Internet service quality and the transparency of information provided to end-users.

- The conclusion of the negotiation and subsequent entry into force of the Regulation that will enshrine the revision of the e-Privacy Directive, which will have significant impacts on the electronic communications sector.
- The exercise of the powers temporarily assigned to ANACOM as a Space Authority.
- The National Cyberspace Security Strategy 2019-2023, which, with regard to communications, aims to promote greater liaison and coordination of the relevant entities in the areas of cyberspace security, namely through the creation of synergies with other entities and regulators in relevant fields. In terms of cooperation, it is worth highlighting the deepening of the relationship between the Centro Nacional de Cibersegurança (National Cybersecurity Centre) and ANACOM.
- The new legislation relating to the National System of Civil Emergency Planning and the activity that ANACOM develops in this regard, namely the coordination of the working group of the population warning system.

It is also worth mentioning the provisions of Commission Recommendation (EU) 2019/534, of 26 March, on the cybersecurity of 5G networks, namely in terms of risk assessment at national level of security measures, of risk assessment at Union level based on national assessments and identification of a possible set of common measures to mitigate the risks related to the infrastructures underlying the digital ecosystem, in particular 5G networks.

With regard to technological developments and the marked dynamics of the market, it is expected that the sector will continue, in the 2020-2022 period, to invest in the expansion of high-speed fibre networks, in the strengthening of 4G coverage, in the introduction of 5G and next generation fixed network standards. Co-investment and infrastructure sharing

may contribute to greater cost savings and efficiency in the pursuit of full coverage of the national territory.

In terms of broadband services, there will be widespread use of high-capacity Internet Protocol (IP) services (video streaming, in the case of consumers, and services supported in the cloud, in the case of companies). The development and use of smartphones and other devices with growing processing capacity and memory is also expected, supporting increasingly sophisticated and resource-consuming applications.

Moreover, the convergence of networks and services and the increasing use of IP networks for routing electronic communications, employing addresses based on E.164 numbering using, in particular, ENUM-type solutions, calls for, bearing in mind ANACOM's duties, the definition of principles and associated rules under the National Numbering Plan (NNP) and also the reassessment of the implementation and operationalisation conditions under the User-ENUM pilot experiment.

Thus, a sharp growth in services and applications based on data transport, as well as those related to the Internet of Things (IoT / machine-to-machine), is foreseeable, to the detriment of traditional forms of voice and message communications.

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# STRATEGIC OBJECTIVES

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### 3. Strategic objectives

Taking into account the duties that derive from its Statutes and other national and EU legislation, and taking into account the ecosystem into which it is integrated and the framework of the sector in which it operates, ANACOM will continue to implement its Multi-Annual Activities Plan 2020-2022 based on the following three strategic objectives:

**1**

To contribute so 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 and ensures fair and dynamic competition.

**2**

To ensure maximum protection of the rights of users of communications, throughout the territory and, in particular, of the most vulnerable, through the promotion of a regulatory framework that gives priority to information and transparency and that discourages and sanctions bad practice.

**3**

To strengthen and hold regulation in Portugal accountable, through full respect for its autonomy, neutrality and independence and the requirement to strictly fulfil its mission, namely through the sharing of information and knowledge and the promotion of efficiency and economy of means and resources indispensable for the full assumption of its responsibilities.

These strategic objectives aim to boost efficiency in the fulfilment of ANACOM's mission, essential for the sustained development of the communications sector, which meets the needs of all users and defends the rights of citizens.

The **1st strategic objective** covers all the activity carried out within the scope of the review/transposition of the sector's regulatory framework, the analysis of relevant markets and regulated wholesale offers, as well as the conditions of access to electronic

communications networks and the postal and telecommunications infrastructures in buildings and urban settlements and infrastructure suitable for the accommodation of electronic communications networks, including the respective security and resilience, including the planning and management of public assets, such as the radio spectrum and numbering resources. It also includes its legal powers as a Space Authority. This first strategic objective is developed in order to promote competitive markets, with incentives for efficient investment and innovation, aiming to satisfy the needs of users, to the benefit of consumers and the economic fabric in general, in terms of choice, prices, quality, innovation and the security of the services provided.

The **2nd strategic objective** includes all activities related to the protection of users' rights, including the regulation and supervision of matters such as, for example, the universal service (US) for electronic communications and the postal service (including, in this case, the density of the postal network, quality of service and prices), digital terrestrial television (DTT), coverage of mobile and broadband services, transparent information to consumers, the handling of complaints, out-of-court settlement of consumption disputes and the neutrality and quality of service of electronic communications networks.

The **3rd strategic objective** reinforces the relevance of autonomy, neutrality and independence as dimensions that must constitute essential axes of its action and which are indispensable for the fulfilment of ANACOM's mission as a regulatory authority, and, temporarily, a Space Authority (Decree-Law 16/2019, of 22 January). For the pursuit of this goal, a priority objective is to share data and information, to develop knowledge resources, as well as to promote an economy of means indispensable for the full assumption of its responsibilities.

In the light of the strategic objectives identified and with a view to giving them form, taking into account the foreseeable execution of the 2019 plan and naturally notwithstanding other actions, the need for/urgency of which will be identified during the course of 2020, a broad set of priorities/actions of a strategic nature is specified in this Plan, and it should be noted that some of them, by their very nature, form part of more than one strategic objective, and will be developed alongside activities of a recurring nature.



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ACTION  
PRIORITIES  
FOR 2020-2022

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#### 4. Action priorities for 2020-2022

Taking into account the strategy defined by ANACOM for the 2020-2022 three-year period, a wide range of activities of a more strategic nature were defined, which constitute the identified action priorities, essentially centred on the first year of the three-year period:

<b>Strategic objective 1</b>	
#	Action priorities
1	Prepare and present to the Assembly of the Republic and the Government the legislative draft (s) transposing Directive (EU) 2018/1972 of the European Parliament and of the Council, of 11 December, which establishes the European Electronic Communications Code
2	Analyse the markets for wholesale local access at a fixed location and wholesale central access at a fixed location for mass consumption products, as well as the market for high quality electronic communications at a fixed location (relevant markets 3a/3b and 4)
3	Analyse the prices of the RCAO (reference conduit access offer), RPAO (reference pole access offer), MAM (Mainland-Azores-Madeira) and inter-island and DTT circuits
4	Develop the relevant numbering standards, including a review of the conditions of use of geographical (and mobile) numbers in nomadic situations, the rules for using CLI (calling line identification) and the creation of a specific range in the NNP for M2M (machine to machine) services
5	Approve the Regulation on the pricing methodology for access and use of suitable infrastructure as provided for in Decree-Law 123/2009
6	Intervene, within the framework of its attributions, in the development of conditions for the provision of the universal postal service, in terms of accessibility and quality, and in the promotion of competition in the postal sector
7	Intervene, within the framework of its attributions, in defining the future European regulatory framework applicable to the postal sector
8	Promote the allocation of the appropriate bands in the context of the introduction of 5G in Portugal, as well as the other actions relevant to its development
9	Review the strategic spectrum plan, with a view to reflecting new trends in spectrum management and planning, namely taking into account the results of the World Radiocommunication Conference (WRC-19) and the drafting of a National Frequency Sharing Agreement for the crisis or war situation
10	Implement the regulation on the security and integrity of electronic communications networks and services (Regulation 303/2019)
11	Promote the implementation of protective and resilience measures for electronic communications infrastructures, particularly in situations of extreme events or disasters
12	Develop actions related to communications under the National Cybersecurity Security Strategy 2019-2023, namely adapt the National Cybersecurity Reference Framework to the communications sector

13	Promote cooperation with local authorities that contributes to the development of the communications sector throughout the national territory, namely in terms of the installation and management of infrastructures
14	Ensure compliance with the rules regarding net neutrality, namely through the monitoring of zero-rating offers

<b>Strategic objective 2</b>	
<b>#</b>	<b>Action priorities</b>
15	Analyse the impact of implementing national roaming solutions
16	Check compliance with coverage obligations and disclose data on quality of service (QoS) of mobile networks and monitor the speed of Internet access through the NET.mede platform
17	Take action to guarantee the population's access to free television, in view of the necessary release of the 700 MHz band
18	Conclude and implement the regulation of procedures to be observed by operators in handling complaints
19	Monitor the implementation of cooperation agreements with consumer dispute arbitration centres, including the monitoring of their activity and the application of financing
20	Cooperate in the definition of a national submarine cable interconnection strategy in Portugal, which ensures internal and external connectivity, enhances new services and allows greater knowledge in terms of seismic detection, environmental protection and scientific research
21	Contribute to the definition of network emergency policies, within the scope of the future National System of Civil Emergency Planning, in collaboration with the Autoridade Nacional de Emergência e Proteção Civil (National Emergency and Civil Protection Authority)

<b>Strategic objective 3</b>	
<b>#</b>	<b>Action priorities</b>
22	Develop a new approach to characterise the communications sector and gather information to support regulatory decisions
23	Establish partnerships with entities pertaining to the national scientific and technological system
24	Improve the quality of interaction and communication with society, including consumers and other users, through the dissemination of ANACOM's activity, aiming in particular at promoting digital literacy
25	Implement the regulation on space activities and perform its functions as a Space Authority
26	Ensure cooperation with other entities and participate in European Union and international groups and organisations

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# GLOBAL INDICATORS

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## 5. Global indicators

To assess the efficiency, efficacy and quality achieved in carrying out its activities (Article 40, paragraph 1 of ANACOM's Statutes), the following two main performance indicators will be taken into account in the 2020-2022 period<sup>1</sup>:

**ID 1 - execution of the Plan:** this indicator measures the number of actions fully carried out compared to the number of actions included in the Plan (also taking into account such actions as may be added or removed).

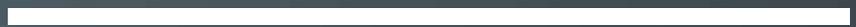
**ID 2 - Percentage of decisions taken within the established period:** corresponds to the percentage of decisions taken within the period established by ANACOM.

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<sup>1</sup> By reference to the provisions of the [Multi-annual Activities Plan 2018-2020](#) (Annex V).



# HUMAN RESOURCES PLAN



## 6. Human resources plan

The strategic management of ANACOM's people in the 2020-2022 three-year period will aim to guarantee, in various aspects, the present and future sustainability of the organisation, against the background of transformation resulting from the implementation of its new structure, which is intended to improve the functioning of the organisation, making it more streamlined, dynamic and effective in the performance of its duties, and the pursuit of its strategic objectives.

In terms of digital transformation, the next three years will see a continuation of the progressive integration of new processes, skills and management models, leveraged by a mix of information and communication technologies that will inevitably have an impact, among others, on the creation of learning opportunities and the generation of knowledge and value. In this context, employee training and development strategies will play a highly relevant role in the regulator's capacity for adaptation and reinvention, with increasingly personalised and flexible approaches focusing on critical skills and associated with the need to anticipate problems and speed of response by ANACOM.

The attraction of external and internal talent and the identification of the management potential that will sustain the organisation's future also represent significant challenges arising from digitisation. ANACOM's human resources strategy will be supported by the provision of means that promote the adjustment of the structure, the advancement of people and the development of systems of recognition that are attractive for the acquisition and retention of talent, albeit in scenarios marked by shorter and shorter employment periods, as is increasingly desired by younger generations driven by long-term career plans, with recognised relevance in terms of the knowledge and experience acquired for the purposes of competing in the global labour market.

Finally, and also as a reflection of the new organisational structure, it will be essential for ANACOM to implement mentoring and coaching strategies that promote the sharing of knowledge considered critical for its activity between generations.

In order to be able to respond to the challenges of the next three years, the following are the main areas of intervention in the field of human resources:

- the implementation of recruitment processes with a view to contracting professionals with backgrounds appropriate to the new organisational model and the preparation of

ANACOM for present and future needs, permanently guaranteeing rejuvenation, the better adaptation of human resources to the challenges that constantly arise and the sustainability of the organisation;

- the definition of consistent leadership values that guide the performance of managers in their role as drivers of change and the alignment of employees around a common vision for the future of the organisation, assuming behaviours that facilitate the process of change, which will be accompanied by a leadership prepared and committed to new challenges;
- the stimulation of training and development programmes for each employee, aiming at the acquisition of new capacities and the updating of functional, digital, behavioural and management skills, namely through learning and knowledge sharing between ANACOM areas, in alignment with its values and the organisation's strategic performance objectives;
- the development of employees with a view to ensuring the continuity of ANACOM's critical functions, through the implementation of diagnostic, mentoring and coaching instruments that allow their development and retention, at all times based on an evolutionary approach and anticipating the role of this Authority and the challenges that are put to it;
- the promotion of an organisational culture geared towards digital literacy, the dematerialisation of processes and the sharing of information in a timely manner, in order to streamline and simplify daily management, as well as support decision-making;
- the boosting and consolidation of the strategic alignment of employees with an organisational culture more open to innovation and change, using internal communication channels and interaction initiatives at all organisational levels;
- the promotion of a policy of incentives and the development of professional careers based on the recognition of the merit of the performance of employees;
- the retention and motivation of employees through the implementation of a programme to reconcile professional, family and personal life, promoting the

management of diversity and gender equality, and the adoption of initiatives based on best practice, as suggested in particular by EU regulations;

- the development of cooperation between ANACOM and the scientific and technological community

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

With regard to the training of its staff, in 2020, ANACOM intends to continue recruitment processes aimed at hiring senior staff, namely juniors, taking an approach based on organisational rejuvenation and adaptation to the new organisational model and the challenges that arise.

The rate of admission of these senior staff will depend on the number of open positions at any given time, bearing in mind the expected maximum limit of 423 ANACOM employees in the next 3 years.

In this way, the Authority will comply, within the scope of its management autonomy, with the rules established in its Statutes for the recruitment of workers (Article 42, paragraph 3) and those resulting from the Framework Law for independent administrative entities with functions to regulate the economic activity of the private, public and cooperative sectors (Law 67/2013, of 28 August, in its current wording - Article 32, paragraph 3), as well as the procedures defined in the rules currently in force - namely, Article 53 of Law 71/2018, of 31 December, which approved the State Budget for 2019 (OE 2019), and Article 157 of Decree-Law 84/2019, of 28 June, which establishes the rules for implementing the OE 2019 (DLEO 2019).



# FINANCIAL PLAN



## 7. Financial plan

In terms of finance, this Authority maintains as a strategic priority the improvement of the efficiency of its activity and the rationalisation of expenses and investments, with the objective of ensuring the containment of the regulatory fees applied to the sector, while maintaining the means necessary to effectively perform its role as an independent regulator, in an increasingly demanding and complex scenario, taking into account the growing attributions and responsibilities it has been given as a result of European directives and national law.

ANACOM's Statutes provide that it is financially independent, endowed with the necessary and adequate resources for the performance of its functions, and that it has autonomy in terms of financial and asset management.

Public accounting rules and the regime of autonomous funds and services are not applicable to ANACOM, with the exception of the situation of net earnings resulting from the use of state property (for example, the radio spectrum), which should revert to the State under terms to be established by Government Administrative Rule.

The Statutes likewise provide for the application of the State treasury regime, with ANACOM using the services of the Instituto de Gestão do Crédito Público (IGCP - Public Debt Management Institute).

It should also be noted that, in 2019, following the publication of Administrative Rule 113/2019, of 15 April, net earnings for 2017 were distributed, in an amount of 36,114,000 euros, as mandated in the Statutes. At the end of November 2019, net earnings for 2018 were still to be distributed.

In accordance with its Statutes, ANACOM's accounting is organised in accordance with the accounting standardisation system (SNC). The 2020 budget and the 2020-2022 financial plan, prepared in accordance with the rules of the SNC, show financial quantification adequate and necessary for the execution of the activities provided for in the Multi-Annual Activities Plan 2020-2022.

## **7.1. Budget 2020**

### **7.1.1. Investment**

The reformulation/modernisation of the image of ANACOM's spectrum monitoring and control centres (SMCC) was one of the investment priorities in 2019 (Porto and Azores), and this same aim will be maintained in 2020 for the Barcarena and Madeira SMCC. The consolidation of the renovation of the server farm, initiated in 2018 as part of the broader IT consolidation programme under the strategic information systems plan (PESI), is also on the list of strategic investment priorities for 2020. The assumption of these priorities in terms of investment, in 2020 (Annex III – table 5), maintains focus on the modernisation and upgrading of monitoring and inspection activities, both in terms of the technological upgrading of equipment and the improvement of the infrastructures where the SMCC operate. These are the goals deemed essential for enabling this Authority to follow the major transformations that are occurring in the communications sector and to fulfil its respective functions and duties.

The estimated amount of investment for 2020 is 4 million euros, corresponding to a variation of +1.6 percent in relation to the 2019 budget. The most significant projects/investments to highlight in 2020 are:

- updating and modernisation of existing infrastructure within the scope of monitoring and control of the spectrum (MCE), the acquisition of equipment for the new communication systems and the upgrading of equipment that supports the various stations of the national radio broadcasting remote control system (SINCRER);
- renovation and consolidation of the IT system, adapting the infrastructural technological strongholds, both in terms of hardware, and software and applications, to support ANACOM's activities, resulting from the digital transformation, mobility and accessibility associated with the measures of the PESI;
- renovation of spaces/buildings, following the need to improve the infrastructures where the SMCC operate, as mentioned above, and to improve the working conditions in terms of facilities in general;

- acquisition of administrative equipment to replace those that are technologically obsolete or damaged.

### **7.1.2. Income**

The income budget for 2020 (Annex III – table 6) results from the application of the rates provided for in the various laws in force. The calculation of the final values took into account each nature 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 which, to that extent, vary according to the value of the costs related to electronic communications regulation activities (representing approximately 35.7 percent of total income);
- (2) fees associated with the use of spectrum frequencies (representing 59.7 percent of total income), which reflect the occupation/use of a scarce public good and which must be occupied and used efficiently, the rates being based on the concept of occupier-payer;
- (3) administrative regulatory fees associated with postal services, which are based on the principle of cost orientation and which, to that extent, vary according to the value of costs related to postal service regulation activities (representing 2.4 percent of total income);
- (4) fees linked to the use of numbers (representing 1.7 percent of total income);
- (5) other fees and income of a different nature, namely fines and surcharges applied and the testing and calibration of equipment from public and private entities at ANACOM laboratories, among others (representing 0.5 percent of total income).

The legal framework for the fees provided for in the 2020 budget is as follows:

- Fees arising from the Electronic Communications Law, which refer to:
  - issuance of statements of rights issued by ANACOM related to the exercise of the activity of provider of electronic communications networks and services, allocation of rights of use of frequencies and allocation of numbers;

- exercise of the activity of supplier of publicly available electronic communications networks and services;
- use of frequencies;
- use of numbering.

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

- Law 5/2004, of 10 February - Electronic Communications Law (ECL), as amended by Law 51/2011, of 13 September, and subject to subsequent amendments, which establishes the legal regime applicable to electronic communications networks and services and related resources and services, and 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 said stations and use of the radio spectrum, as well as the sharing of radiocommunications infrastructure;
- Administrative Rule 1473-B/2008, of 17 December, as amended by Administrative Rule 296-A/2013, of 02 October, by Administrative Rule 378-D/2013, of 31 December, and by Administrative Rule 157/2017, of 10 May.
- Fees related to the activity of postal service operators – the laws governing these fees are the following:
  - Law 17/2012, of 26 April - establishes the regime for access and exercise of the activity of provider of postal services operated in competition;
  - Administrative Rule 1473-B/2008, of 17 December, in the wording given by Administrative Rule 296-A/2013, of 02 October – supports the collection of fees due in this context.
- Other fees - due to their importance, the following regulations should be mentioned:
  - administrative fees and those for use of the amateur radio service - Decree-Law 53/2009, of 02 March, lays down the regime for the use of the amateur radio service, and Administrative Rule 1473-B/2008, of 17 December, in the wording

given by Administrative Rule 296-A/2013, of 02 October, establishes the respective fees to be charged;

- fees for accessing and operating as an audiotext service provider - Decree-Law 177/1999, of 21 May, lays down the arrangements for access and Administrative Rule 567/2009, of 27 May, establishes the respective fees to be charged.
- Other services provided and other income:
  - testing and calibration of equipment - the amounts included under this item refer to services provided by ANACOM in the context of the tasks assigned to it and result from the application of a specific tariff, as determined by its Management Board (MB);
  - inspection actions - this item includes the income resulting from inspections, namely fines imposed and inspections carried out, the values of which are fixed by the MB;
  - surcharges – applied in accordance with the legislation in force;
  - interest and other similar income – this item includes, essentially, arrears interest charged for the late payment of invoices issued by ANACOM;
  - EU subsidies – these amounts refer to travel to meetings and conferences within the EU, in accordance with the tasks assigned to ANACOM, in cases where travel expenses are reimbursed by the European Union;
  - other income – this item covers income and gains of low value or of an occasional nature, including those arising from the sale of scrap, the disposal of assets, etc., as well as extraordinary items and those associated with accounting adjustments.

In the 2020 budget, income is expected to reach 96.8 million euros, an amount that is higher than the income forecast in the 2019 budget (2.3 million euros more), due to the combination of the following effects:

- an increase of approximately +1.8 million euros in administrative electronic communications regulation fees, as a result of an increase in litigation provisions. The sum of these provisions forecast for 2020 took into account the prospects

concerning the evolution of litigation procedures;

- an increase in the number of calls requested by operators, as part of the use of fixed service frequencies, which resulted in an increase of +0.3 million euros;
- increase in regulatory fees for postal services, due to the revaluation of provisions, the effect of which is +0.2 million euros.

### **7.1.3. Expenses**

As part of the development of the digital terrestrial television (DTT) network migration plan, with a view to releasing the 700 MHz band for 5G, in 2019, ANACOM launched an array of wide-ranging actions having a direct impact on the spending foreseen in the 2019 and 2020 budgets. Bearing in mind that these actions were developed on various fronts, namely an extended communication campaign, involving the issuance of leaflets and letters on a large scale and presence in the media considered relevant, as well as the constitution of a call centre to provide further information to users and ANACOM's operational teams for field support, the respective financial impact was determined, which in 2019 stood at 0.4 million euros and, in 2020, is expected to reach 2.6 million euros (amount shared among the various actions defined above). In this context, the option taken by ANACOM to directly ensure actions of proximity using its own means and by hiring external entities offers highly significant savings compared to the costs it would incur if the services were provided by the operators that own the infrastructure associated with DTT. If the option had been different – to use the services of that operator – the costs would have been far greater, as a result of which ANACOM's decision represents a significant efficiency measure, which is reflected in considerable savings for the State.

Regardless of the need to incorporate expenditures resulting from this legal imperative into the budgets, measures to rationalise expenditures aimed at improving internal efficiency will continue, although, naturally, the potential savings are now lower and very much localised on specific actions, given that many have already been implemented in previous years, namely: (i) the implementation of the new server farm, involving its replacement with more efficient mechanisms, allowing savings on maintenance costs; (ii) the renegotiation of service provision contracts, on an ongoing basis, involving a number of cost savings across several fronts; (iii) the careful definition of the number of trips abroad and the number of days spent in meetings and events; (iv) the use of internal

resources instead of temporary work, and the reformulation of the method used to deal with complaints; (v) the renegotiation of ANACOM's financial holdings in international bodies representing the Portuguese State (reduction, or cancellation, where possible, of participation units).

Part of the cost savings will be used to cover, albeit partially, the impact of a set of external factors in which ANACOM is virtually powerless to intervene, as is the case with the evolution of provisions, the level of contributions defined by law (e.g. to the Autoridade da Concorrência - AdC - Competition Authority), the operationalisation of a support plan for users related to the migration of DTT and compliance with the legislation that determines that the regulatory entities must bear part of the operating costs of the arbitration centres for alternative dispute resolution (Articles 16 and 17 of Law 144/2015, of 08 September).

In 2020, supplies and external services will reach 12.7 million euros, which translates into an increase (+2.6 million euros, +25.9%) compared to the amount budgeted in 2019 (Annex III - table 7), taking into account the actions mentioned above regarding the support plan for the migration of DTT and the renewal of the lease on the headquarters building (0.3 million euros).

Regarding personnel costs, the amount foreseen in the 2020 budget (Annex III - table 8) includes the workforce approved by the MB, which is identical to that of 2019 (423 employees), expected expenditure on career development, the process of which relates to 2018, under the exact terms as determined in LOE2019 (Law 71/2018, of 31 December), and the cost of updating pay scales.

The combination of these factors, plus the additional expenses incurred with ANACOM employees involved in the DTT migration process (overtime and subsistence allowances), results in an increase in personnel costs in 2020 (+4.5%). The main resource of a regulatory entity like ANACOM is its human resources, and it is normal for personnel expenses to constitute the largest portion of the expenditure structure, the main components of which are:

- the remuneration of the governance bodies;
- the remuneration of ANACOM's staff and additional remuneration for 2020;

- charges on ANACOM's remunerations, which reflect the contribution to Social Security made through the application of the Taxa Social Única (TSU - Single Social Tax) and the contribution to the Caixa Geral de Aposentações (CGA - Civil Service Pension Fund);
- post-employment benefits, which include the contribution of this Authority to the Pension Fund, taking into account the payment of retirement pensions to a group of workers subscribing to the CGA and the responsibilities related to health care to be provided to those same workers;
- industrial injuries insurance, which is extended to all employees;
- social action expenses, namely the costs resulting from agreements signed with entities that provide occupational medicine services, under the ambit of disease prevention, hygiene and safety at work, as well as all those provided for in collective bargaining under the Acordo de Regulamentação Coletiva de Trabalho (ARCT - Collective Bargaining Agreement);
- the amount associated with training of different types, an activity considered strategic for the development of competencies, skills upgrading and training of ANACOM workers, against an increasingly complex and demanding sectoral background.

Personnel costs will reach 28.1 million euros in 2020, which represents an increase of 1.2 million euros compared to the expenses foreseen in the 2019 budget.

In the 2020 budget, depreciation and amortisation expenses amount to 2.7 million euros, slightly lower than in the 2019 budget, including the depreciation and amortisation of assets held by ANACOM by applying specific rates resulting from legislation.

A further 50 thousand euros are also considered under the item impairment losses, for net variations relating to impairments that affect the debts receivable, mainly due to the difficulty of collecting invoices issued, an amount that is the same as that considered in the 2019 budget.

In the 2020 budget, the criterion used in the previous Plan is maintained in terms of estimated provisions for ongoing litigation, which translates into an increase in provisions

of 3 million euros, from 14.8 million euros (in the budget of 2019) to 17.8 million euros (in the 2020 budget). The criterion consists of starting from the actual values existing at the end of 2018 (existing lawsuits) and projecting any new claims occurring in 2019 and 2020, according to the history of claims, to which the accounting policies in force apply, and which, generally, are the following:

- i) with regard to the amounts claimed in lawsuits related to challenges to regulatory acts, the provision is estimated according to the higher or lower risk estimate;
- ii) with regard to lawsuits involving claims for the use of frequencies, the provision corresponds to 100% of the amount claimed and/or outstanding;
- iii) with respect to the amounts requested in liquidation acts related to administrative regulatory fees, given the specific nature of this type of claim, it is considered that the provision must cover the entire amount requested within a time frame of four years, a period after which the statute of limitations will apply and the recovery of fees settled under the General Tax Law will prove impossible.

Finally, in the 2020 budget, the item other expenses and losses amounts to 7.9 million euros, an amount similar to that budgeted for 2019 (Annex III – table 7). This situation means that the increases resulting from the expenses inherent to the legal obligations to which ANACOM is bound, namely the contribution to the AdC and the financing of the arbitration centres for alternative dispute resolution, were offset by reductions in the items in which ANACOM was able to intervene.

The total expenditures forecast for 2020 amount to 62.5 million euros, 10.6% above those budgeted for 2019.

#### **7.1.4. Profit**

Based on previous estimates, the net profit forecast in the 2020 budget will amount to 27.6 million euros (-13.7% over the 2019 budget), as shown in Annex III - table 9.

## **7.2. Financial plan 2020-2022**

The parts that make up ANACOM's financial plan for the 2020-2022 three-year period are set out in Annex IV, and are as follows:

- Investment plan (for projects);
- Income plan;
- Expenditure plan;
- Income statement by nature;
- Cash budget;
- Balance sheets;
- Statement of cash flows.

The global investment plan for 2020-2022 will exceed that of 2019, for the entire period of the plan. Indeed, significant investment is expected to improve the infrastructure owned by ANACOM, namely the modernisation/reformulation of the image of the SMCC in Barcarena and Madeira and the construction of a building in Barcarena that will make up for the lack of space required to meet the needs of the SMCC services, as well as the construction of a training centre. The focus remains on improving the technological infrastructure of the information systems, resulting, in this case, from the realisation of aspects related to the consolidation of information technology under the PESI.

The income plan is expected to continue to consist of income from the settlement and collection of all fees due to ANACOM by suppliers of electronic communications networks and services, according to the regulation costs incurred with the respective regulation activities, and fees related to the use of frequencies and the use of numbering, which together will represent around 97 percent of the total, as well as fees related to postal services and other income, which will represent the remaining three percent.

In the period 2020-2022, an adjustment of fees due to ANACOM by providers of electronic communications networks and services and of fees for postal services is expected, as a result of the evolution of the moving average of provisions and the stabilisation of the total value of the remaining revenues, which will be more pronounced in 2020 (+2.4%) compared to 2019, and which will translate into more moderate overall increases of +1.6% and +1.9%, in 2021 and 2022.

As a result of the above, during the period of the Plan, the total level of spending is expected to increase in 2020 (+10.6%), driven by spending on migration to DTT, a decrease in 2021 (-1.7%), the year in which these expenses cease to exist, and an increase in 2022 (+2.6%). These variations are fully justified by the increase in the value of provisions for ongoing litigation, by the operationalisation in 2020 of the support plan for users related to DTT migration, by the increase in the contribution to the AdC, by the operating costs to be borne with the arbitration centres and the increase in personnel expenses resulting from the development of careers and the updating of pay scales. Regarding expenses in relation to which ANACOM does not have the power to intervene, increases were considered in items sensitive to changes in the value of the national minimum wage or inflation, namely surveillance and security, hygiene and cleaning and rents and leases. In terms of expenses in relation to which ANACOM has the power to intervene, savings were considered in the items specialised work and travel and stopovers abroad. Alongside these expectations of changes in expenditures, the implementation of internal efficiency measures will continue (review of internal processes, various renegotiations). In the personnel costs component, the number of staff is expected to remain the same over the course of the period, with an increase of 3.5% to cover the updating of the pay scale and/or career progression. Compared to 2020, the 2021 value is substantially the same, since in 2020 expenses associated with the involvement of ANACOM teams in the migration to DTT were considered, which will not be repeated in the following years, as well as a significantly lower value for terminations by mutual agreement.

The remaining accounting and financial maps are also presented, prepared from the income, expenses and investments already explained, and the accounting criteria of the SNC, usually used by ANACOM and accepted by the auditors, were maintained in their preparation. It should also be noted that, in the preparation of the balance sheet, income statement and other financial items, it was considered that the Administrative Rules for the allocation of the surplus would be published in the year following the year to which the results relate.



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# ANNEXES

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## Annex I - Strategic staff plan (tables)

**Table 1. Evolution in ANACOM human resources**

Category	2020	2021	2022
1 - Managerial staff	274	274	274
2 - Non-managerial staff	149	149	149
<b>Total permanent staff (1 + 2)</b>	<b>423</b>	<b>423</b>	<b>423</b>

Unit: Number of Employees

**Table 2. Evolution in types of complementary work**

Category	2020	2021	2022
Supplementary work	14 832	4 832	4 832
<b>Total</b>	<b>14 832</b>	<b>4 832</b>	<b>4 832</b>

Unit: Hours

**Table 3. Evolution in personnel costs**

Category	2020	2021	2022
Wages and expenses	25 002 500	25 476 600	26 347 400
Other personnel costs	3 066 600	2 601 600	2 652 600
<b>Total</b>	<b>28 069 100</b>	<b>28 078 200</b>	<b>29 000 000</b>

Unit: Euros

**Table 4. Personnel costs plan**

<b>Category</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
1. Permanent contracts (year-end)	423	423	423
2. Permanent staff potential (1800 hours/year)	761 400	761 400	761 400
3. Supplementary work (hours)	14 832	4 832	4 832
<b>4. Potential work (2 to 3)</b>	<b>776 232</b>	<b>766 232</b>	<b>766 232</b>
5. Remuneration of governance bodies	808 779	808 828	808 856
6. Staff remuneration	16 171 834	16 742 700	17 333 717
7. Additional remuneration	3 908 425	3 736 962	3 868 877
8. Post-employment benefits	875 565	892 980	924 502
9. Staff expenses	4 113 462	4 188 110	4 335 950
10. Industrial injuries insurance	96 019	97 929	101 386
11. Social action expenses	785 016	800 691	816 712
12. Other personnel costs	1 310 000	810 000	810 000
<b>13. Total (5+12)</b>	<b>28 069 100</b>	<b>28 078 200</b>	<b>29 000 000</b>

Unit: Euros

## Annex II - Budget 2020 (tables)

**Table 5. Investment budget**

Category	2019 Budget	2020 Budget	2020/2019 Variation	
			Value	%
Land and buildings	585 000	1 000 000	415 000	70.9%
Basic equipment	934 500	957 500	23 000	2.5%
Transport equipment	40 000	100 000	60 000	150.0%
Administrative equipment				
* IT equipment (Hardware)	620 000	620 000	0	0.0%
* Other miscellaneous equipment	45 000	60 000	15 000	33.3%
Computer programs (Software)	1 708 000	1 260 000	-448 000	-26.2%
Building modifications	30 000	30 000	0	0.0%
<b>Total</b>	<b>3 962 500</b>	<b>4 027 500</b>	<b>65 000</b>	<b>1.6%</b>

Unit: Euros.

**Table 6. Income budget**

Category	2019 Budget	2020 Budget	2020/2019 Variation	
			Value	%
<b>Regulation of electronic communications</b>	<b>91 878 000</b>	<b>93 913 300</b>	<b>2 035 300</b>	<b>2.2%</b>
* Statements of rights	5 600	9 900	4 300	76.8%
* Exercise of electronic communications	32 707 700	34 500 000	1 792 300	5.5%
* Use of frequencies - TECS	44 183 300	44 183 300	0	0.0%
* Use of frequencies - other	13 279 200	13 565 900	286 700	2.2%
* Use of numbering	1 702 200	1 654 200	-48 000	-2.8%
<b>Regulation of postal services</b>	<b>2 061 300</b>	<b>2 259 900</b>	<b>198 600</b>	<b>9.6%</b>
<b>Settled fines</b>	<b>240 000</b>	<b>300 000</b>	<b>60 000</b>	<b>25.0%</b>
<b>Other services provided</b>	<b>128 700</b>	<b>117 600</b>	<b>-11 100</b>	<b>-8.6%</b>
<b>Interest and other similar income</b>	<b>30 000</b>	<b>30 000</b>	<b>0</b>	<b>0.0%</b>
<b>Other income</b>	<b>149 200</b>	<b>117 000</b>	<b>-32 200</b>	<b>-21.6%</b>
<b>Total</b>	<b>94 487 200</b>	<b>96 737 800</b>	<b>2 250 600</b>	<b>2.4%</b>

Unit: Euros.

**Table 7. Expenditure budget**

Category	2019 Budget	2020 Budget	2020/2019 Variation	
			Value	%
<b>External supplies and services</b>	<b>10 053 900</b>	<b>12 653 800</b>	<b>2 599 900</b>	<b>25.9%</b>
* Specialised work	2 769 900	3 805 600	1 035 700	37.4%
* Advertising and promotion	170 000	1 677 000	1 507 000	886.5%
* Surveillance and security	489 000	503 500	14 500	3.0%
* Maintenance and repairs	2 063 000	1 804 800	-258 200	-12.5%
* Books and technical documentation	200 000	200 000	0	0.0%
* Energy and liquids	517 000	480 900	-36100	-7.0%
* Travel, stopovers and transport	493 600	700 400	206 800	41.9%
* Rents and hire charges	1 617 300	1 877 100	259 800	16.1%
* Communication	327 000	362 900	35 900	11.0%
* Insurance	86 100	93 000	6 900	8.0%
* Cleaning, hygiene and comfort	307 500	300 000	-7 500	-2.4%
* Other supplies and services	1 013 500	848 600	-164 900	-16.3%
<b>Personnel costs</b>	<b>26 866 800</b>	<b>28 069 100</b>	<b>1 202 300</b>	<b>4.5%</b>
* Wages and expenses	23 713 700	25 002 500	1 288 800	5.4%
* Other personnel costs	3 153 100	3 066 600	-86 500	-2.7%
<b>Depreciation and amortisation expenses</b>	<b>2 800 000</b>	<b>2 700 000</b>	<b>-100 000</b>	<b>-3.6%</b>
<b>Impairment losses</b>	<b>50 100</b>	<b>50 100</b>	<b>0</b>	<b>0.0%</b>
<b>Provisions for the period</b>	<b>14 831 000</b>	<b>17 770 200</b>	<b>2 939 200</b>	<b>19.8%</b>
<b>Other expenses</b>	<b>7 945 300</b>	<b>7 943 000</b>	<b>-2 300</b>	<b>0.0%</b>
* Levies	796 400	640 900	-155 500	-19.5%
* Meetings and conferences	147 000	188 000	41 000	27.9%
* Sponsorships	68 400	210 000	141 600	207.0%
* Holdings/Transfers	6 671 700	6 757 600	85 900	1.3%
* Cooperation	82 100	70 000	-12 100	-14.7%
* Other expenses	179 700	76 500	-103 200	-57.4%
<b>Total</b>	<b>62 547 100</b>	<b>69 186 200</b>	<b>6 639 100</b>	<b>10.6%</b>

Unit: Euros.

**Table 8. Budget for personnel costs**

Category	2019 Budget	2020 Budget	2020/2019 Variation	
			Value	%
1. Permanent contracts (year-end)	423	423	0	0.0%
2. Permanent staff potential (1800 hours/year)	761 400	761 400	0	0.0%
3. Supplementary work (hours)	4 304	14 832	10 528	244.6%
<b>4. Potential work (2 to 3)</b>	<b>765 704</b>	<b>776 232</b>	10 528	1.4%
5. Remuneration of governance bodies	831 500	808 779	-22 721	-2.7%
6. Staff remuneration	15 823 000	16 171 834	348 834	2.2%
7. Additional remuneration	3 149 400	3 908 425	759 025	24.1%
8. Post-employment benefits	863 500	875 565	12 065	1.4%
9. Staff expenses	3 909 800	4 113 462	203 662	5.2%
10. Industrial injuries insurance	94 500	96 019	1 519	1.6%
11. Social action expenses	725 100	785 016	59 916	8.3%
12. Other personnel costs	1 470 000	1 310 000	-160 000	-10.9%
<b>Total (5 to 12)</b>	<b>26 866 800</b>	<b>28 069 100</b>	<b>1 202 300</b>	<b>4.5%</b>

Unit: Euros.

**Table 9. Income and expenses budget**

Category	2019 Budget	2020 Budget	2020/2019 Variation	
			Value	%
<b>INCOME</b>				
* Fees for electronic communications activity	32 707 700	34 500 000	1 792 300	5.5%
* Fees for use of frequencies	57 462 500	57 749 200	286 700	0.5%
* Fees for use of numbering	1 702 200	1 654 200	-48 000	-2.8%
* Fees for regulation of postal services	2 061 300	2 259 900	198 600	9.6%
* Other services provided	374 300	427 500	53 200	14.2%
* Interest and similar income obtained	30 000	30 000	0	0.0%
* Other income and gains	149 200	117 000	-32 200	-21.6%
<b>Total income</b>	<b>94 487 200</b>	<b>96 737 800</b>	<b>2 250 600</b>	<b>2.4%</b>
<b>EXPENSES</b>				
* External supplies and services	10 053 900	12 653 800	2 599 900	25.9%
* Personnel expenses	26 866 800	28 069 100	1 202 300	4.5%
* Depreciation and amortisation expenses	2 800 000	2 700 000	-100 000	-3.6%
* Impairment losses	50 100	50 100	0	0.0%
* Provisions for the period	14 831 000	17 770 200	2 939 200	19.8%
* Other expenses and losses	7 945 300	7 943 000	-2 300	0.0%
<b>Total expenses</b>	<b>62 547 100</b>	<b>69 186 200</b>	<b>6 639 100</b>	<b>10.6%</b>
<b>Net profit for the period</b>	<b>31 940 100</b>	<b>27 551 600</b>	<b>-4 388 500</b>	<b>-13.7%</b>

Unit: Euros.

## Annex III - Financial plan 2020-2022 (tables)

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

Category	Purpose	2020	2021	2022
Modernisation of laboratories	Acquisition of equipment in view of developments in technology and the regulatory framework; software updates	197 500	195 000	195 000
Technological upgrading of spectrum monitoring	Upgrading of existing infrastructure for spectrum monitoring and control (MCE) and acquisition of equipment for new communications systems	220 000	440 000	440 000
Major repairs and updates to SINCRER	Various updates to the national system for remote control of radio broadcasting	50 000	60 000	60 000
Reformulation/modernisation of the SMCC image	Acquisition of equipment and improvement of infrastructure to support centres for the monitoring and control of the radio spectrum	540 000	100 000	100 000
Technological Adaptation - Architecture and Technological Platforms	Adaptation of infrastructure technological strongholds through acquisition of necessary hardware and software	1 800 000	1 700 000	1 600 000
Acquisition of various basic items of radio equipment	Acquisition of day-to-day basic equipment for inspections	50 000	150 000	150 000
Acquisition of various items of computer equipment	Acquisition of day-to-day hardware and software	80 000	80 000	80 000
Renovation of premises/buildings	Upgrading of MCE centres and improvement of working conditions (2020). Construction of a building in Barcarena (2021-2022)	1 030 000	2 030 000	2 030 000
Miscellaneous current acquisitions	Acquisition of administrative equipment	60 000	60 000	60 000
<b>Total</b>		<b>4 027 500</b>	<b>4 815 000</b>	<b>4 715 000</b>

Unit: Euros

**Table 11. Income plan**

<b>Category</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
<b>Electronic communications</b>	<b>93 913 300</b>	<b>95 413 300</b>	<b>97 313 300</b>
* Statements of rights	9 900	9 900	9 900
* Exercise of electronic communications	34 500 000	36 000 000	37 900 000
* Use of frequencies - TECS	44 183 300	44 183 300	44 183 300
* Use of frequencies - Other	13 565 900	13 565 900	13 565 900
* Use of numbering	1 654 200	1 654 200	1 654 200
<b>Exercise of postal services</b>	<b>2 259 900</b>	<b>2 329 900</b>	<b>2 385 900</b>
<b>Other services provided</b>	<b>417 600</b>	<b>417 600</b>	<b>417 600</b>
<b>Interest and other similar income</b>	<b>30 000</b>	<b>30 000</b>	<b>30 000</b>
<b>Other income</b>	<b>117 000</b>	<b>117 000</b>	<b>117 000</b>
<b>TOTAL</b>	<b>96 737 800</b>	<b>98 307 800</b>	<b>100 263 800</b>

Unit: Euros

**Table 12. Expenditure plan**

<b>Category</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
<b>External supplies and services</b>	<b>12 653 800</b>	<b>10 512 400</b>	<b>10 433 100</b>
* Specialised work	3 805 600	3 259 500	3 122 300
* Advertising and promotion	1 677 000	177 000	177 000
* Surveillance and security	503 500	554 000	592 800
* Maintenance and repairs	1 804 800	1 804 800	1 804 800
* Books and technical documentation	200 000	200 000	200 000
* Energy and liquids	480 900	480 900	480 900
* Travel, stopovers and transport	700 400	560 400	540 300
* Rents and hire charges	1 877 100	1 983 300	1 999 300
* Communication	362 900	320 900	320 900
* Insurance	93 000	93 000	93 000
* Cleaning, hygiene and comfort	300 000	330 000	353 200
* Other supplies and services	848 600	748 600	748 600
<b>Personnel costs</b>	<b>28 069 100</b>	<b>28 078 200</b>	<b>29 000 000</b>
* Wages and expenses	25 002 500	25 476 600	26 347 400
* Other personnel costs	3 066 600	2 601 600	2 652 600
<b>Depreciation and amortisation expenses</b>	<b>2 700 000</b>	<b>2 900 000</b>	<b>2 900 000</b>
<b>Impairment losses</b>	<b>50 100</b>	<b>50 100</b>	<b>50 100</b>
<b>Provisions for the period</b>	<b>17 770 200</b>	<b>18 629 300</b>	<b>19 457 200</b>
<b>Other expenses</b>	<b>7 943 000</b>	<b>7 864 200</b>	<b>7 984 900</b>
* Levies	640 900	640 700	640 700
* Meetings and conferences	188 000	188 000	188 000
* Sponsorships	210 000	210 000	210 000
* Holdings/Transfers	6 757 600	6 679 000	6 799 700
* Cooperation	70 000	70 000	70 000
* Other expenses	76 500	76 500	76 500
<b>TOTAL</b>	<b>69 186 200</b>	<b>68 034 200</b>	<b>69 825 300</b>

Unit: Euros

**Table 13. Income statement by nature**

Category	2020	2021	2022
<b>Income and expenses</b>			
* Fees for electronic communications activity	34 500 000	36 000 000	37 900 000
* Fees for use of frequencies	57 749 200	57 749 200	57 749 200
* Fees for use of numbering	1 654 200	1 654 200	1 654 200
* Fees for postal service activity	2 259 900	2 329 900	2 385 900
* Other services provided	427 500	427 500	427 500
* External supplies and services	-12 653 800	-10 512 400	-10 433 100
* Personnel expenses	-28 069 100	-28 078 200	-29 000 000
* Impairment losses	-50 100	-50 100	-50 100
* Provisions for the period	-17 770 200	-18 629 300	-19 457 200
* Other income and gains	<b>117 000</b>	<b>117 000</b>	<b>117 000</b>
* Other expenses and losses	-7 943 000	-7 864 200	-7 984 900
<b>Profit before depreciation and amortisation</b>	<b>30 221 600</b>	<b>33 143 600</b>	<b>33 308 500</b>
* Expenses/reversals for depreciation and amortisation	-2 700 000	-2 900 000	-2 900 000
<b>Operating profit</b>	<b>27 521 600</b>	<b>30 243 600</b>	<b>30 408 500</b>
* Interest and similar income obtained	30 000	30 000	30 000
<b>NET PROFIT FOR THE YEAR</b>	<b>27 551 600</b>	<b>30 273 600</b>	<b>30 438 500</b>

Unit: Euros

**Table 14. Cash budget**

Category	2020	2021	2022
<b>Balance brought forward</b>	<b>205 724 300</b>	<b>218 887 600</b>	<b>239 582 900</b>
Receipts			
* Income from operations	96 707 800	98 277 800	100 233 800
* Interest and other similar income	30 000	30 000	30 000
<b>Total receipts</b>	<b>96 737 800</b>	<b>98 307 800</b>	<b>100 263 800</b>
Payments			
* Investment	4 027 500	4 815 000	4 715 000
* Operations	48 665 900	46 454 800	47 418 000
* Application of profits	30 881 100	26 342 700	28 792 500
<b>Total payments</b>	<b>83 574 500</b>	<b>77 612 500</b>	<b>80 925 500</b>
<b>Available funds</b>	<b>218 887 600</b>	<b>239 582 900</b>	<b>258 921 200</b>

Unit: Euros

**Table 15. Balance sheet**

<b>Category</b>	<b>2020</b>	<b>2021</b>	<b>2022</b>
<b>Assets</b>			
<b>Non-current assets</b>	<b>18 791 500</b>	<b>20 676 500</b>	<b>22 461 500</b>
* Tangible fixed assets	16 455 500	18 195 500	19 935 500
* Intangible assets	2 335 100	2 480 100	2 525 100
* Other accounts receivable	900	900	900
<b>Current assets</b>	<b>222 837 600</b>	<b>243 882 900</b>	<b>263 471 200</b>
* Customers	2 000 000	2 000 000	2 000 000
* Other accounts receivable	450 000	600 000	750 000
* Deferrals	1 500 000	1 700 000	1 800 000
* Available funds	218 887 600	239 582 900	258 921 200
<b>Total assets</b>	<b>241 629 100</b>	<b>264 559 400</b>	<b>285 932 700</b>
<b>Equity and liabilities</b>			
<b>Equity</b>	<b>97 236 200</b>	<b>101 167 100</b>	<b>102 813 100</b>
* Other reserves	69 684 600	70 893 500	72 374 600
* Net profit for the period	27 551 600	30 273 600	30 438 500
<b>Liabilities</b>	<b>144 392 900</b>	<b>163 392 300</b>	<b>183 119 600</b>
* Provisions/post-employment benefits/Impairments	137 928 500	156 607 900	176 115 200
* Other accounts payable	6 464 400	6 784 400	7 004 400
<b>Total liabilities + Equity</b>	<b>241 629 100</b>	<b>264 559 400</b>	<b>285 932 700</b>

Unit: Euros

**Table 16. Statement of cash flows**

Category	2020	2021	2022
<b>Cash flows - Operating activities</b>			
* Revenues from customers	96 590 800	98 160 800	100 116 800
* Payments to suppliers	-12 683 800	-10 542 400	-10 463 100
* Payments to employees	-28 069 100	-28 078 200	-29 000 000
<b>Cash generated from operations</b>	<b>55 837 900</b>	<b>59 540 200</b>	<b>60 653 700</b>
* Other revenue/payments	-38 708 100	-34 090 900	-36 661 400
<b>Cash flows from operating activities</b>	<b>17 129 800</b>	<b>25 449 300</b>	<b>23 992 300</b>
<b>Cash flows - Investment activities</b>			
<b>Payments for:</b>			
* Tangible fixed assets	-2 737 500	-3 625 000	-3 625 000
* Intangible assets	-1 260 000	-1 160 000	-1 060 000
<b>Revenue from:</b>			
* Tangible fixed assets	1 000	1 000	1 000
* Interest and similar income	30 000	30 000	30 000
<b>Cash flows from investment activities</b>	<b>-3 966 500</b>	<b>-4 754 000</b>	<b>-4 654 000</b>
<b>Change in cash and cash equivalents</b>	<b>13 163 300</b>	<b>20 695 300</b>	<b>19 338 300</b>
<b>Cash and cash equivalents at the start of the period</b>	<b>205 724 300</b>	<b>218 887 600</b>	<b>239 582 900</b>
<b>Cash and cash equivalents at the end of the period</b>	<b>218 887 600</b>	<b>239 582 900</b>	<b>258 921 200</b>

Unit: Euros

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