



Annual Report

Annual Report
of the Agency for
Communication
Networks and Services
of the Republic of
Slovenia for 2024

2024

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ABBREVIATIONS

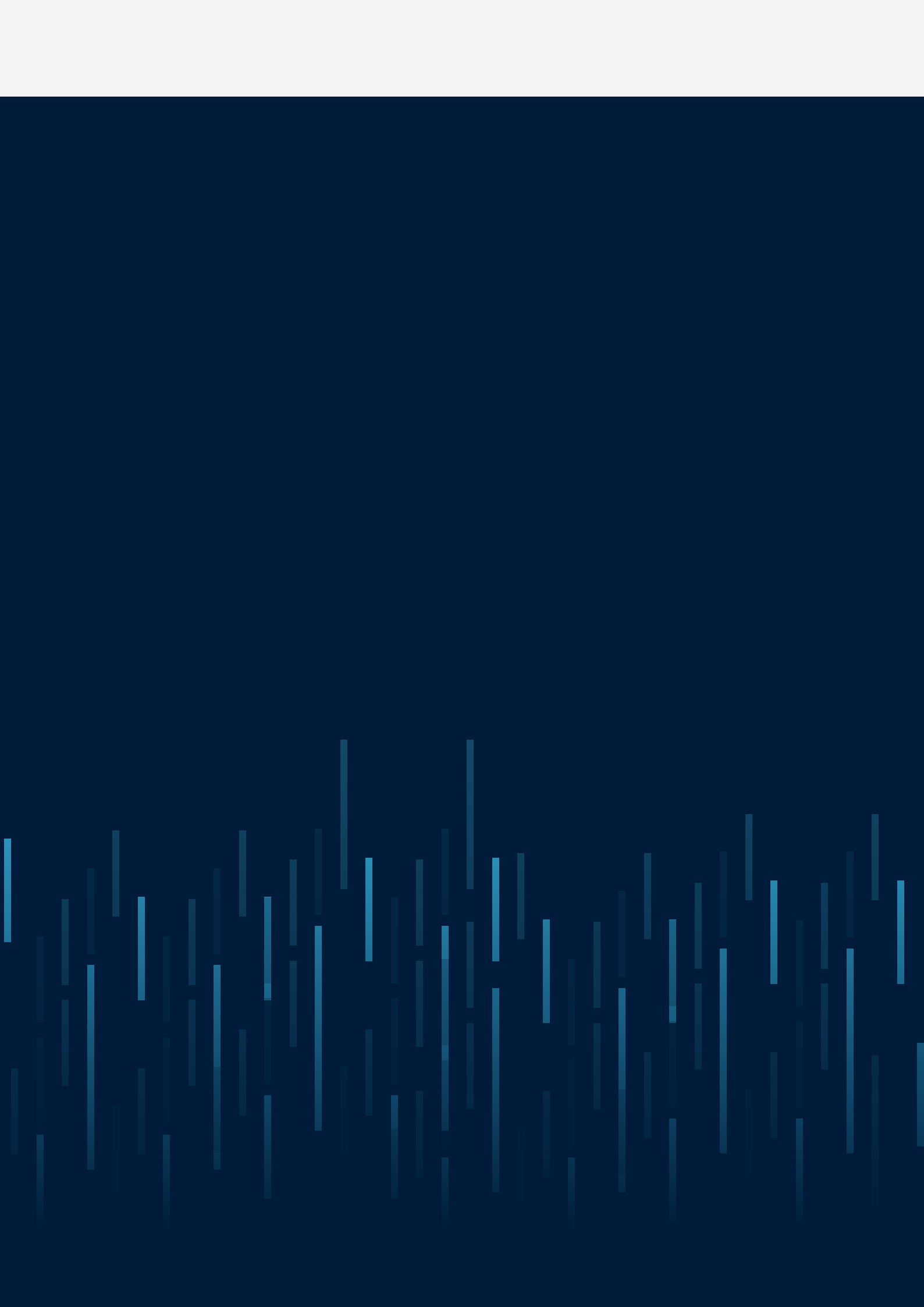
ABBREVIATIONS	Slovenian name or meaning	English name or meaning ¹
AKOS	Agencija za komunikacijska omrežja in storitve Republike Slovenije	Agency for communication networks and services of the Republic of Slovenia
AI	Umetna inteligenca	Artificial intelligence
AVMS	Avdiovizualne medijske storitve	Audiovisual media services
BB	Širokopasovni	Broadband
BEREC	Organ evropskih regulatorjev za elektronske komunikacije	The Body of European Regulators for Electronic Communications
BIPT	Belgijski regulator za pošto in telekomunikacije	Belgisch Instituut voor postdiensten en telecommunicatie
BSA	Prenos z bitnim tokom	Bitstream access
BWA	Širokopasovni brezžični dostop	Broadband wireless access
CDMA-PAMR	Kodno porazdeljeni sodostop – mobilni radio z zasebnim dostopom Code	Division Multiple Access – Public Access Mobile Radio
CEF		Connecting Europe Facility
CEPT	Evropska konferenca za pošto in telekomunikacije	European Conference of Postal and Telecommunications
COCOM	Odbor za komunikacije	Communications Committee
CERP	Evropski odbor za regulacijo pošte	European Committee for Postal Regulation
CRS	Centralni register subjektov	
CPE	Centralna procesna enota	
CPRI	Standard za povezovanje radijskih enot v telekomunikacijskih omrežjih	
DAB	Digitalna avdio radiodifuzija	Digital audio broadcasting
DSA	Akt o digitalnih storitvah	The Digital Service Act
DSC	Koordinator digitalnih storitev	Digital Services Coordinator
DTT	Digitalna prizemna televizija	Digital terrestrial television
DVB-T	Prizemna digitalna video radiodifuzija	Digital Video Broadcasting Terrestrial
DVB-T2	Prizemna digitalna video radiodifuzija – druga generacija	Digital Video Broadcasting – Second Generation Terrestrial
EBDS	Evropski odbor za digitalne storitve	European Board for Digital Services
EBU	Evropsko združenje za radiodifuzijo	European Broadcasting Union
EBMS	Evropski odbor za medijske storitve	
ECASEC	Delovna skupina nacionalnih organov za varnost elektronskih komunikacijskih omrežij in storitev	
ECC	Odbor za elektronske komunikacije	Electronic Communications Committee
EECC	Evropski zakonik o elektronskih komunikacijah	European Electronic Communications Code
EENA	Evropska organizacija za nujno številko 112	European Emergency Number Association
EG RE	Strokovna skupina za radijsko opremo	Expert group on Radio Equipment
ERGP	Evropsko združenje regulatorjev za poštno storitve	European Regulators Group for Postal Services
EKO	Elektronska komunikacijska omrežja	

¹ Where applicable.

EMC	Elektromagnetna združljivost	Electromagnetic compatibility
ENISA	Agencija Evropske unije za varnost omrežij in informacij	European Union Agency for Network and Information Security
ELMAR	Hrvaško društvo za elektroniko na morju	
ENRRB	Evropska mreža železniških regulativnih organov	European Network of Rail Regulatory Bodies
EPRA	Evropska platforma regulativnih organov	European Platform of regulatory authorities
ERGA	Skupina evropskih regulatorjev za avdiovizualne medijske storitve	European Regulators Group for Audiovisual Media Services
ERGP	Evropsko združenje poštinih regulatorjev	European Regulators Group for Postal Services
ETSI	Evropski inštitut za telekomunikacijske standarde	European Telecommunications Standards Institute
EU	Evropska unija	European Union
EK	Evropska komisija	European Commission
FM	Frekvenčna modulacija	Frequency modulation
FTTH	Optika do doma	Fibre to the home
FUP	Politika poštene uporabe storitev	Fair usage policy
FWBA	Nadomestek fiksne širokopasovnega interneta	Fixed Wireless Broadband Access
GB	Gigabajt	
GHZ	Gigahertz	
GIA	Akt o gigabitni infrastrukturi	The Gigabit Infrastructure Act
GJI	Gospodarska javna infrastruktura	Public infrastructure
GOŠO	Javni razpis za gradnjo odprtih širokopasovnih omrežij	
GSMA	Združenje mobilnih operaterjev	
GURS	Geodetska uprava Republike Slovenije	The surveying and mapping authority of the Republic of Slovenia
HAKOM	Hrvaška regulatorna agencija za omrežne dejavnosti	Hrvatska regulatorna agencija za mrežne djelatnosti
HCM	Usklajena metoda za preračun	Harmonised calculation method
HIBS	IMT bazne postaje na visokotečih plosčadnih platformah	High altitude platform stations as IMT base stations
ICS	Inštitut za korporativne varnostne študije	
IKT	Informacijsko – komunikacijska tehnologija	Information and communications technology
IoT	Internet stvari	Internet of things
IP	Internetni protokol	Internet protocol
IPTV	Televizija prek internetnega protokola	Internet protocol television
IRG	Skupina neodvisnih regulatorjev	Independent Regulators Group
IRG – Rail	Združenje neodvisnih regulatorjev s področja železniškega prometa	Independent Regulators' Group – Rail
ITU	Mednarodna telekomunikacijska zveza	International Telecommunications Union
JAŽP	Javna agencija za železniški promet	
JŽI	Javna železniška infrastruktura	
KDS	Koordinator digitalnih storitev	Digital Services Coordinator
LIR	Lokalni internetni register	
LTE	Dolgoročna evolucija	Long term evolution
MBit/s	Megabit na sekundo	
MDP	Ministrstvo za digitalno preobrazbo	
MHz	Megahertz	

MiPi	Medijska in informacijska pismenost	Media and informational literacy
MMS	Sistem večpredstavnostnih sporočil	Multimedia messaging service
MMDS	Multimedijski večkanalni distribucijski sistem	Multipoint multichannel distribution system
M2M	Komunikacija med napravami	Machine to machine
MZI	Ministrstvo za infrastrukturo	
NATO	Severnoatlantska pogodbeno organizacija	North Atlantic Treaty Organization
NGA BU	Omrežje naslednje generacije od spodaj navzgor	Next generation access bottom up
NICAM	Nizozemski inštitut za klasifikacijo avdiovizualnih medijskih vsebin	Netherlands Institute for the Classification of Audiovisual Media
NR		New Radio
NSA	Nesamostojno omrežje	Non- Standalone
NURF	Načrt uporabe radijskih frekvenc	
ODOP	Odločba o odmeri plačila za uporabo radijskih frekvenc	
ODRF	Odločba o dodelitvi radijskih frekvenc	
OECD	Organizacija za gospodarsko sodelovanje in razvoj	Organisation for Economic Co-operation and Development
ODŠT	Odločba o določitvi števila točk	
OPT	Omrežna priključna točka	
OPTM	Operater s pomembno tržno močjo	
OTT	Prenos video in avdio signala prek internetnih storitev	Over the top
PDC	Odbor za poštno direktivo	Postal Directive Committee
PCI	Fizični identifikatorji celic	
PDFN	Program dela in finančni načrt agencije	
PLB	Osební javljalik lokacije	
PMR	Profesionalni mobilni radio	Professional mobile radio
P-P	Točka-točka	Point to point
PPDR	Javna zaščita in pomoč v nesrečah	Public protection and disaster relief
QoSBB	Kakovost širokopasovnega dostopa	Broadband Quality of Service
RAB	Angažiran kapital za izvajanje univerzalne poštne storitve	
RF	Radijske frekvence/ radiofrekvenčni	
RFC	Evropski tovorni koridorji	Rail Freight Corridors
RIPE NCC	Regionalni internetni register za Evropo, Bližnji vzhod in Srednjo Azijo	
RLAH	Gostovanje kot doma	Roam like at home
RMMS	Program spremljanja trga storitev v železniškem prometu	Rail Market Monitoring Scheme
RS	Republika Slovenija	Republic of Slovenia
RTR	Avstrijski nacionalni regulator	
RSCoM	Odbor za radijski spekter	
RSPG	Skupina za politiko radijskega spektra EU	Radio Spectrum Policy Group
SEK	Svet za elektronske komunikacije RS	
SERAF	Forum enotnega železniškega evropskega trga	Single European Railway Area Forum
SICERT	Nacionalni odzivni center za kibernetiko varnost	
SIST	Slovenski inštitut za standardizacijo	Slovenian institute for standardization
SPIS	Pisarniški informacijski sistem	
SRDF	Svet za radiodifuzijo	

TCAM	Odbor za ugotavljanje skladnosti in nadzorovanje telekomunikacijskega trga	Telecommunications Conformity Assessment and Market Surveillance Committee
TDD		Time Division Duplex
TETRA	Prizemni snopovni radio	Terrestrial Trunked Radio
TIRS	Tržni inšpektorat Republike Slovenije	
TRA-ECS	Prizemni radijski sistemi, ki lahko zagotavljajo elektronske komunikacijske storitve	Terrestrial Radio Applications Capable Of Providing Electronic Communications Services
BIVŠI TRG 1	Dostop do javnega telefonskega omrežja na fiksni lokaciji za rezidenčne in poslovne uporabnike (maloprodajni trg)	Access to the public telephone network at fixed location for residential and non-residential customers
TRG 1	Veleprodajno zaključevanje klicev v posameznih javnih telefonskih omrežjih na fiksni lokaciji (nekdanji trg 3)	Call termination on individual public telephone networks provided at a fixed location (wholesale level)
TRG 2	Veleprodajno zaključevanje govornih klicev v posameznih mobilnih omrežjih (nekdanji trg 7)	Voice call termination on individual mobile networks (wholesale level)
TRG 4	Veleprodajni visokokakovostni dostop na fiksni lokaciji (nekdanji trg 6)	Wholesale high-quality access provided at a fixed location
UPU	Svetovna poštna zveza	Universal Postal Union
URSIV	Urad Vlade Republike Slovenije za informacijsko varnost	
VHF	Zelo visoke frekvence	Very high frequency
VLOPSE	Zelo velike platforme in iskalniki	
VOD	Video na zahtevo	Video on demand
VOIP	Telefonija prek internetnega protokola	Voice over internet protocol
VULA	Virtualna razvezava lokalnega dostopa	
ZAVMS	Zakon o avdiovizualnih medijskih storitvah	
ZDPSI	Zakon o dostopnosti do proizvodov in storitev za invalide	
ZDSMA	Zakon o dostopnosti spletišč in mobilnih aplikacij	
ZEKom-2	Zakon o elektronskih komunikacijah	
ZIMI	Zakon o izenačevanju možnosti invalidov	
ZIUETDS	Zakon o izvajanju Uredbe (EU) o enotnem trgu digitalnih storitev	
ZIUOPZP	Zakon o interventnih ukrepih za odpravo posledic in zemeljskih plazov avgusta 2023	
ZMed-1	Zakon o medijih	
ZORZFS	Zakon o obnovi, razvoju in zagotavljanju finančnih sredstev	
ZZeLP	Zakon o železniškem prometu	
ZPS	Zveza potrošnikov Slovenije	
ZPSto-2	Zakon o poštnih storitvah	
ZZUZIS	Zakon o zdravstveni ustreznosti živil in izdelkov ter snovi, ki prihajajo v stik z živili	
ZVPot-1	Zakon o varstvu potrošnikov	
WACC	Izračun povprečnega tehtanega stroška kapitala	Weighted average cost of capital
WGFM	Delovna skupina za upravljanje spektra	Working Group Frequency Management
WG NaN	Delovna skupina za številke in omrežja	Working Group Numbering and Networks
WRC	Svetovna radijska konferenca	World Radio Conference
5G	Mobilna omrežja pete generacije	5 th generation mobile networks
3GPP		3 rd Generation Partnership Project





Business Report

Change is the
only constant
in life.

In 2024, the Agency underwent changes and organizational restructuring following the assignment of its new competence as the national digital services coordinator. The Agency's structure is no longer organized in functional terms, but has instead adopted a more business-oriented organization with a focus on regulatory responsibilities.

I INTRODUCTION

Change is the only constant in life. In 2024, the Agency underwent changes and organizational restructuring following the assignment of its new competence as the national digital services coordinator. The Agency's structure is no longer organized in functional terms, but has instead adopted a more business-oriented organization with a focus on regulatory responsibilities. Gradually, all of the Agency's supervisory responsibilities will fall under a unified Sector for Supervision and Measurements. For the first time in history, the Agency has more than 100 employees – 104 at the end of the year, compared to 95 in the same period last year. We consider this to be a major achievement, as it was accomplished during a period when qualified personnel are in demand on the market.

We have successfully established the new Digital Services Sector. In 2024, an entire ecosystem related to the supervision of digital services was formed at the European level, and in 2025, we will continue to establish a local partner ecosystem, with the aim of granting trusted notifier status, as provided for in the Digital Services Act.

In the field of radio frequency spectrum management, we have successfully completed the tender for 5G private networks for industry and local communities. In the future, we plan to introduce a portal-based method for awarding spectrum for 5G campuses, with which the Agency aims to adapt the processes of awarding parts of the frequency spectrum to industry needs.

The Agency also completed the public tender for awarding radio frequencies for terrestrial digital radio broadcasting networks T-DAB+, for multiplexes R4 and R5. The Agency published a tender for the spectrum for machine-to-machine (M2M) communication in the 700 MHz band, but received no offers.

The field of electronic communications was stirred up by the announced market consolidation. If the two operators complete the merger, it will result in a transformation of competitive conditions. Our next step is to conduct a new market analysis and appropriately adjust regulatory measures to its results. Sectoral legislation for the implementation of the Gigabit Infrastructure Act is also opening up, while at the same time we are already preparing the strategy for gradually switching off the copper network.

In the field of electronic media regulation, 2024 was marked by the preparation of new media legislation. If the





proposed Media Act (ZMed-1) is adopted, it will assign several new competences to the Agency. The key challenge will be their implementation in 2026.

We conducted a tender for analogue audio broadcasting and awarded FM frequencies to selected providers. At the same time, we also published a tender for awarding radio program broadcasting licenses in DAB+ digital broadcasting technology, where we tendered 24 digital broadcasting licenses. In 2025, the Agency will fill multiplexes R4 and R5 by awarding these rights, thereby significantly contributing to the digitalization of Slovenian radio.

In railway services market regulation, the unconfirmed tariff reduced the budget, so we had to limit our activities to the implementation of legally required obligations. In 2024, we carried out several supervisory procedures related to the allocation of infrastructure capacities and the issue of freight train reception in the Port of Koper.

In the field of postal services regulation, the Court of Audit of the Republic of Slovenia completed an audit of the implementation and financing of the universal postal service, which addressed the key challenges of the Slovenian postal sector. Due to the decline of universal service use, legislative changes will be necessary to ensure long-term sustainability and adaptation of

the system in the coming years. In 2024, we improved the procedure for approving the universal service price list, which will enable faster price adjustments with the new year and not with a half-year delay.

In 2024, the Agency strengthened its international activities and involvement in international decision-making. It successfully applied and was elected to chair the Body of European Regulators for Electronic Communications (BEREC) in 2026. In 2025, we will be part of the presiding trio, responsible for preparing the BEREC operational plan for 2026. We are the smallest regulator in the entire history of the Chairmanship to chair this important partner of the European Commission. This opens up a unique opportunity as the European Union is revising the regulatory framework for electronic communications. The European Commission's White Paper on Digital Infrastructure already indicates changes in European regulation, which will bring additional challenges and opportunities for all stakeholders.

The introduction highlights only some of the Agency's main activities by individual areas. A more detailed overview is presented in the continuation of this Annual Report, which includes substantive and financial parts.

Marko Mišmaš, MSc
Director of the Agency

FIGURE 1: 2024 IN NUMBERS



II SUMMARY: ACHIEVING KEY LONG-TERM OBJECTIVES

1 OCCURRENCE OF POTENTIAL UNACCEPTABLE OR UNEXPECTED CONSEQUENCES AND THE ESTIMATE OF THE EFFECTS OF OPERATIONS ON OTHER AREAS

The implementation of the Agency's Financial Plan is detailed in chapter 3.2.3 of the Financial Report. It was realized in 112.8 % on the revenue side, and 90.7 % on the expenditure side.

2 ASSESSMENT OF THE EFFECTIVENESS AND EFFICIENCY OF OPERATIONS

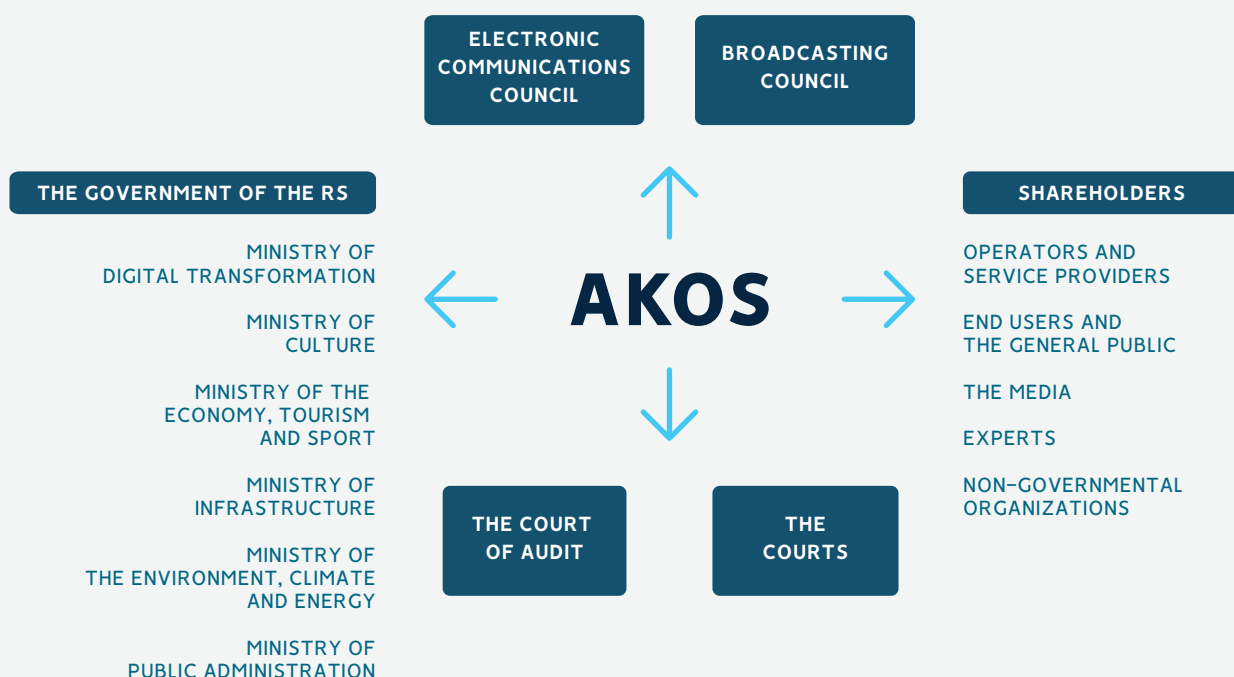
The Agency assesses that considering the adopted 2024 Operational and Financial Plan it operated economically and efficiently. Under the given conditions and in the scope of the limitations it achieved the majority of the goals it set out, as evident from the tables, divided by competences that show the fulfillment of set goals. In addition, the Agency completed an internal reorganisation and a series of additional unplanned tasks, as these often depend on changes in the markets that the Agency regulates. Additionally, external factors that cannot be foreseen in advance and staff turnover also impact the completion of planned tasks. In spite of the above, the Agency assesses that it was successful in completing its goals and objectives in 2024.

III ABOUT THE AGENCY FOR COMMUNICATION NETWORKS AND SERVICES OF THE REPUBLIC OF SLOVENIA

The Agency's mission is to ensure the effective development of communications networks and services that benefit the residents and businesses of the Republic of Slovenia, to encourage competition, ensure equitable operation of the operators of electronic communications network and services, postal service providers, and transport services providers in the railway system, to ensure universal service, to manage the radio spectrum and numbering space, to regulate the content of radio and television programming and on demand audiovisual media services, performing the tasks of the national coordinator of digital services, addressing the dissemination of terrorist online content, and to protect user rights. In carrying out its mission, the Agency follows European legislation, follows all legislation and implementation acts, while also actively participating in the development of new approaches and legislative changes, ensuring the transfer of best practices, and providing professional support and informing the relevant ministries about the identified needs for adjusting the regulation of matters within its competence.

The transparency of operation is ensured through the Agency's cooperation with various stakeholders, including operators and service providers, end-users, the general public, the media, as well as non-governmental organizations, the Electronic Communications Council, the Broadcasting Council, state bodies, courts and European institutions, and international associations of regulators and international organisations. Considering the areas of work carried out by the Agency, it has several relevant ministries, namely the Ministry of Digital Transformation, the Ministry of the Economy, Tourism and Sport, the Ministry of Infrastructure, the Ministry of the Natural Resources and Spatial Planning, the Ministry of Public Administration and the Ministry of Culture.

FIGURE 2: THE INSTITUTIONAL ENVIRONMENT OF THE AGENCY FOR COMMUNICATION NETWORKS AND SERVICES OF THE REPUBLIC OF SLOVENIA

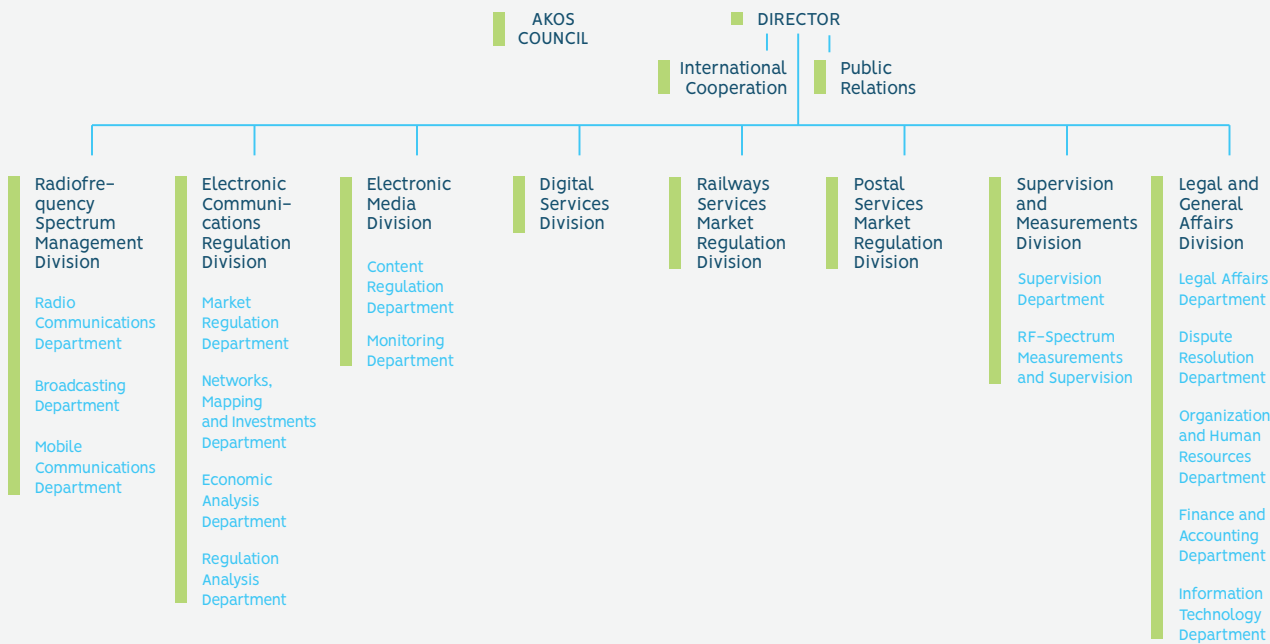


In accordance with its strategic objectives the Agency undertakes to ensure the accessibility and high quality of universal services to all residents of the Republic of Slovenia at affordable prices and regardless of their geographic location, effective competition in the market, and competitiveness among service providers. The Agency ensures and supervises the efficient utilization of the radio frequency spectrum and numbering space, as well as the just and equitable access to public railway infrastructure. It is also committed to ensuring equal conditions for all radio and television publishers, as well as providers of other audiovisual content, along with ensuring the operation of electronic communications and the use of the radio frequency spectrum for providing services in times of extraordinary circumstances.

In its work the Agency strives to pursue the objective of protecting national interests and the interests of service users. The Agency's objectives also include encouraging the development and introduction of new services and technologies for a higher quality of living, and the development of the economy by ensuring suitable conditions for new investments, and the development and improvement of radio and television programming, and their availability to the public on any device capable of receiving them. The Agency undertakes to perform its tasks successfully, effectively, and in accordance with valid legislation and the public good.

The Agency's bodies are its director and the Council. In 2024, the Agency completed a reorganisation, establishing the sectors for radio frequency spectrum anagement, electronic communications regulation, electronic media, digital services, railway services market regulation, postal services market regulation, supervision and measurements, and the sector for legal and general affairs.

FIGURE 3: THE ORGANIZATION OF THE AGENCY FOR COMMUNICATION NETWORKS AND SERVICES OF THE REPUBLIC OF SLOVENIA

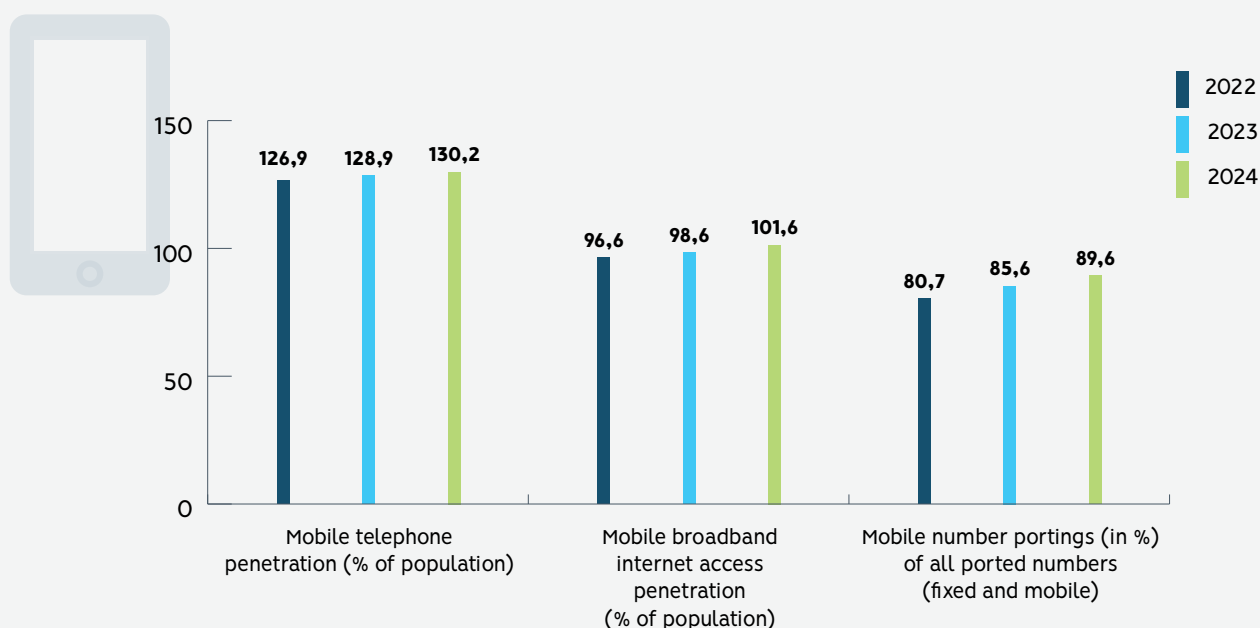


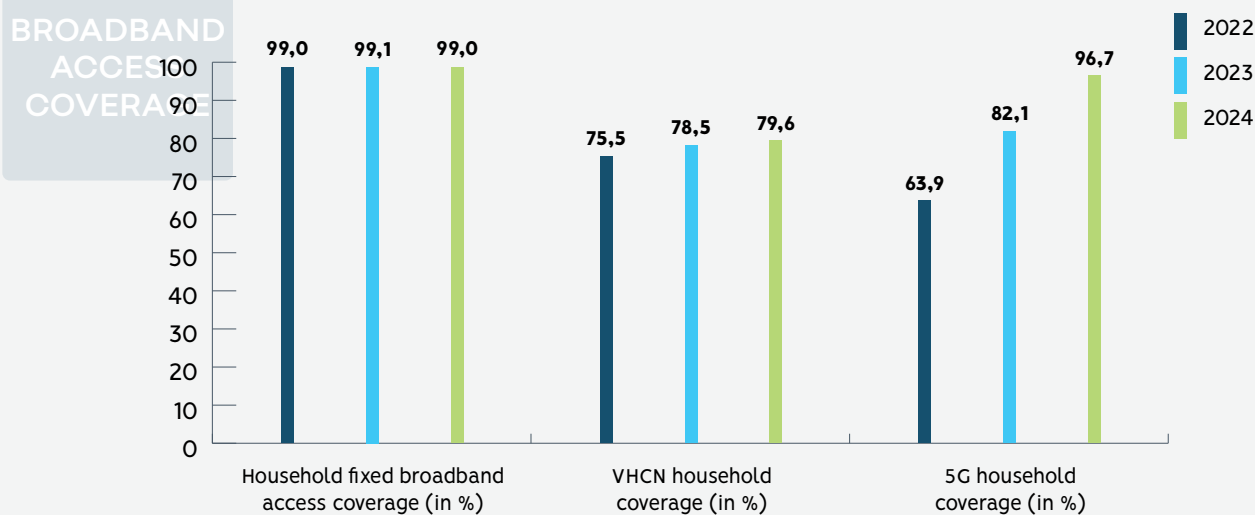
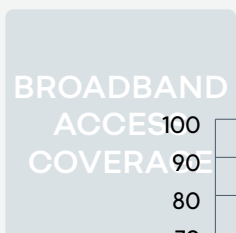
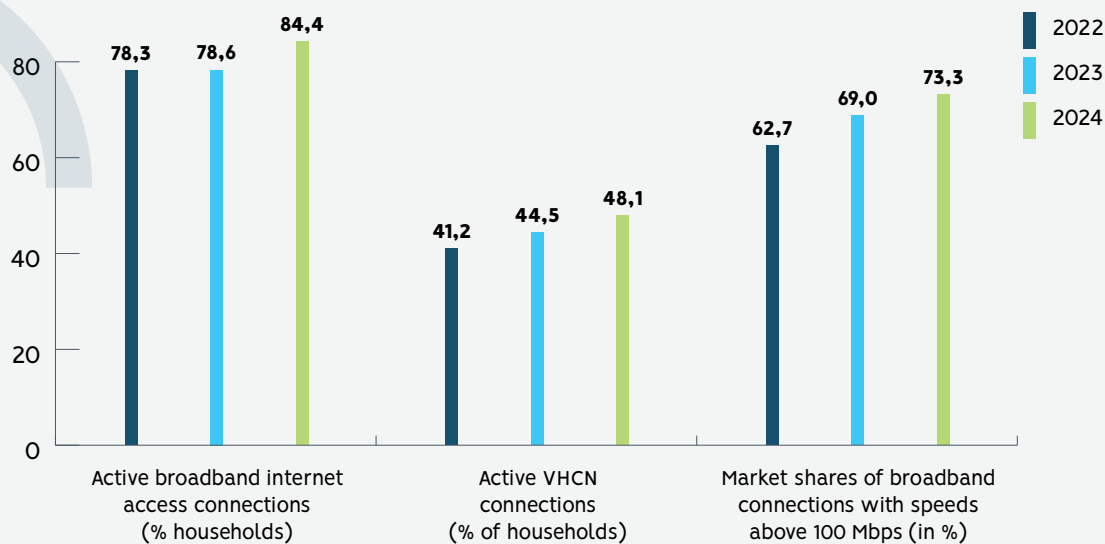
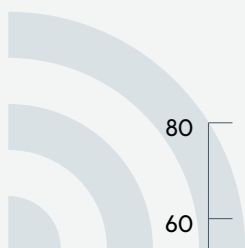
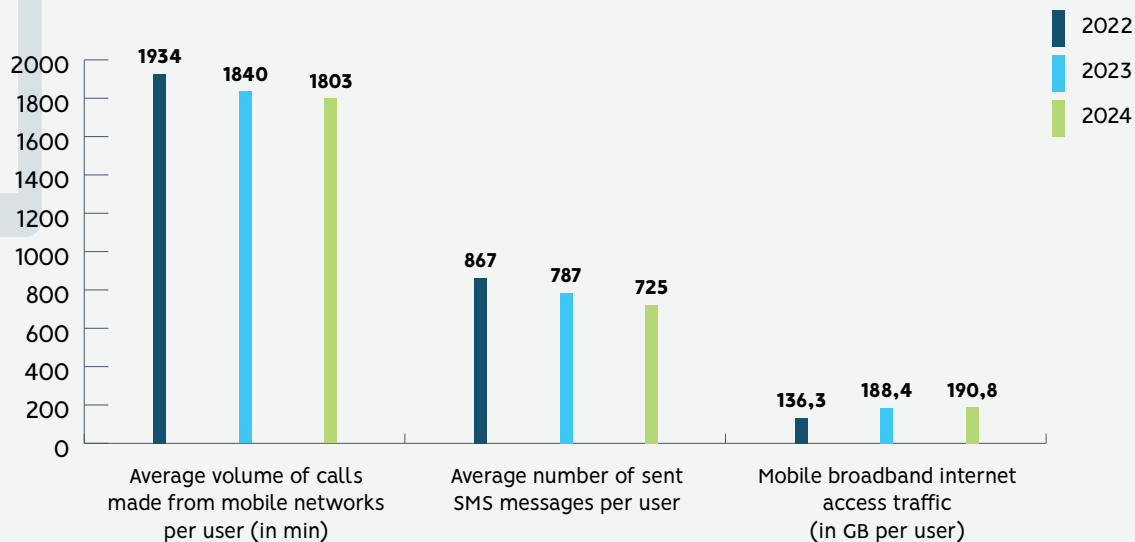
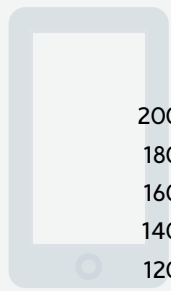
IV MARKETS IN CORE NUMBERS

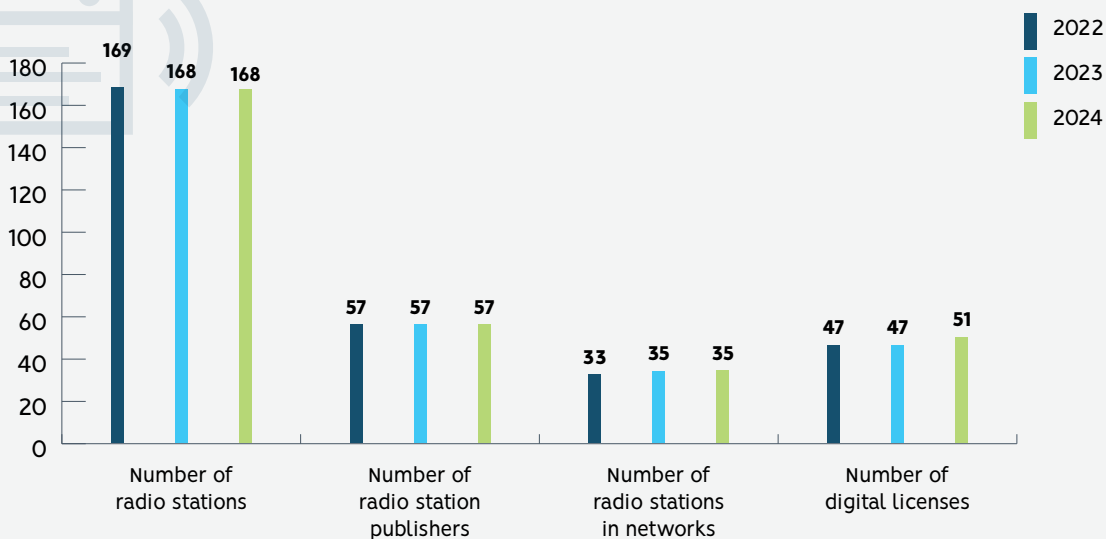
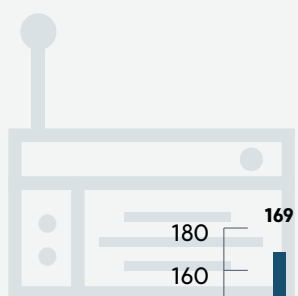
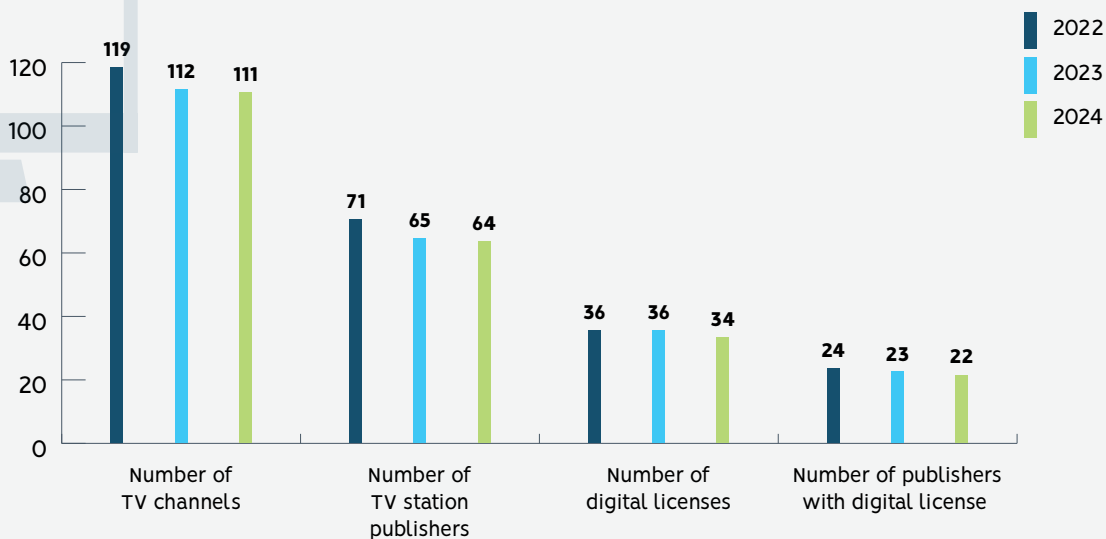
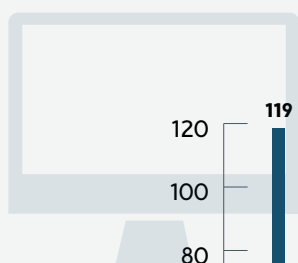
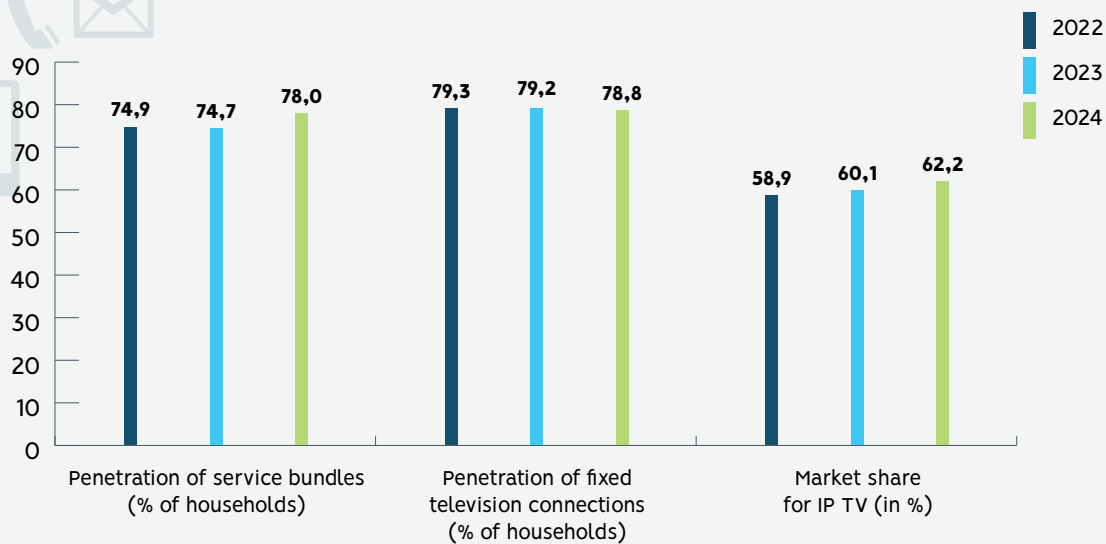
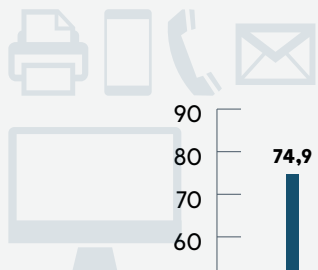
Trends in markets in the Agency's authority in the period of 2022–2024: It is understood that:

- figures are shown on an annual basis;
- the penetration of individual services is calculated based on the data from the Statistical Office of the Republic of Slovenia, specifically the number of residences from the census, and the number of residents from officially published data for individual periods.
- a user of mobile telephone services is a residential user who uses mobile telephone services. The data pertains to the average amount of calls made from mobile networks or text messages sent or mobile broadband internet access data transferred by residential users;
- number porting means the number of ported mobile phone numbers (transactions) to providers in the observed period, which includes all transactions (to various providers and back to the original provider);
- a user of fixed telephone services is a residential user who uses fixed telephone services. The data pertains to the average amount of calls made by residential users in fixed networks.
- broadband coverage includes both households with active or inactive connections, and households that are within network range and where a connection can be established within a reasonable time and at a reasonable cost (total = broadband coverage in the entire territory of Slovenia; rural = broadband coverage in the rural area of Slovenia);
- or the number of television or radio channels the data are based on the number of license holders (publishers) for conducting television or radio activities.
- a digital license is a license to perform television and radio activities in a digital format.
- deviations from previously published data may occur because of data subsequently submitted by operators;
- data related to digital services refers to the first three quarters of 2024, as the Agency's authority as the Digital Services Coordinator was granted by law, which entered into force in April 2024.

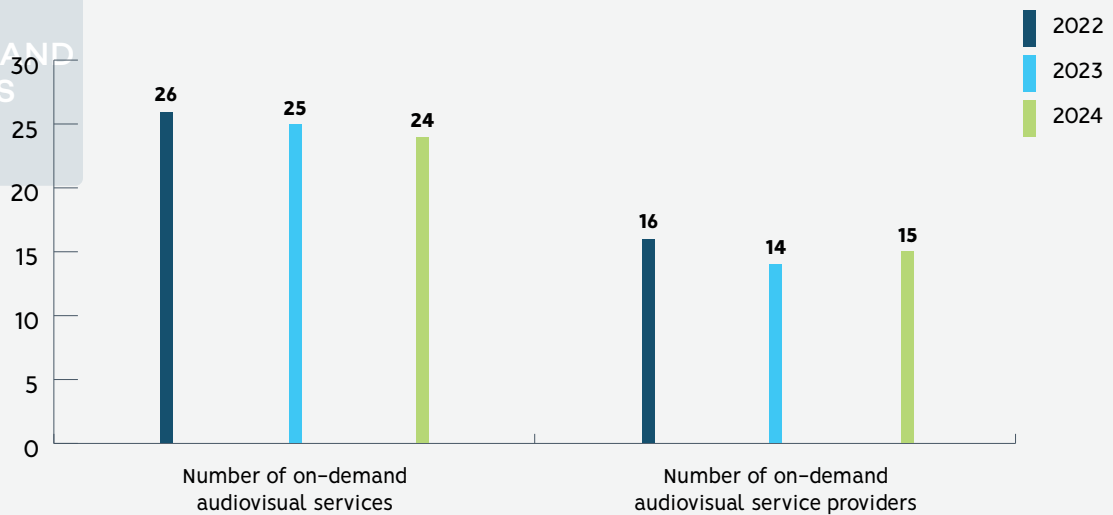
FIGURE 4: TRENDS IN MARKETS WITHIN THE AGENCY'S COMPETENCIES



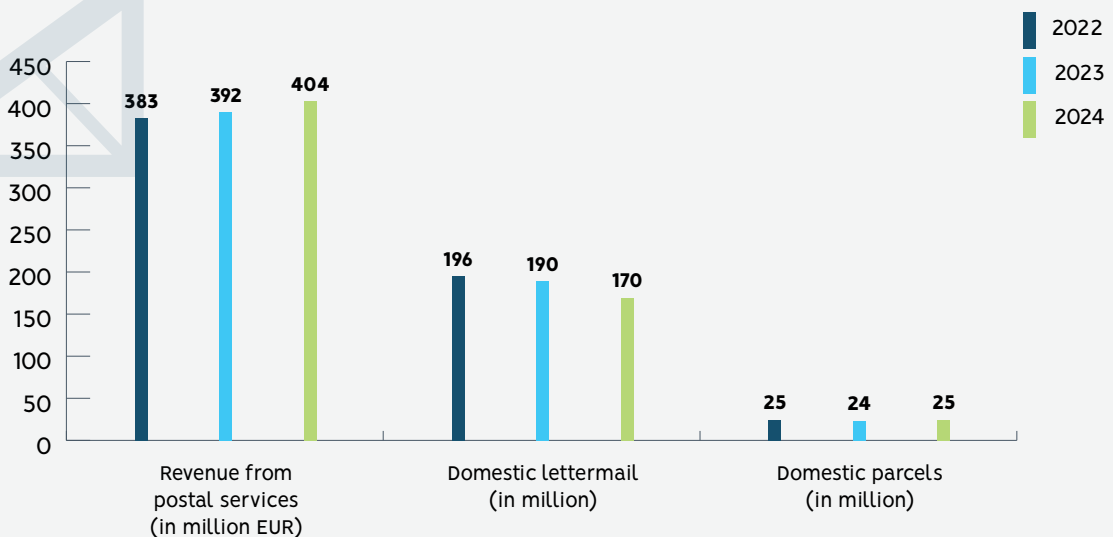
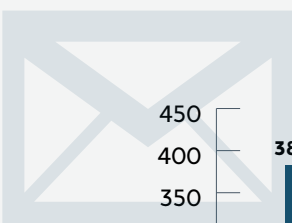
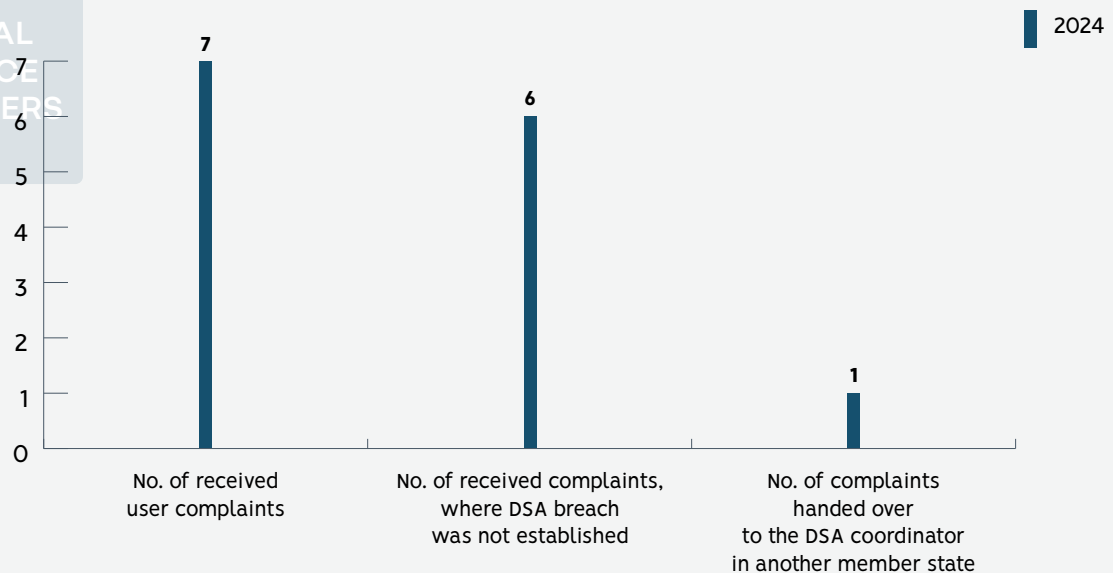


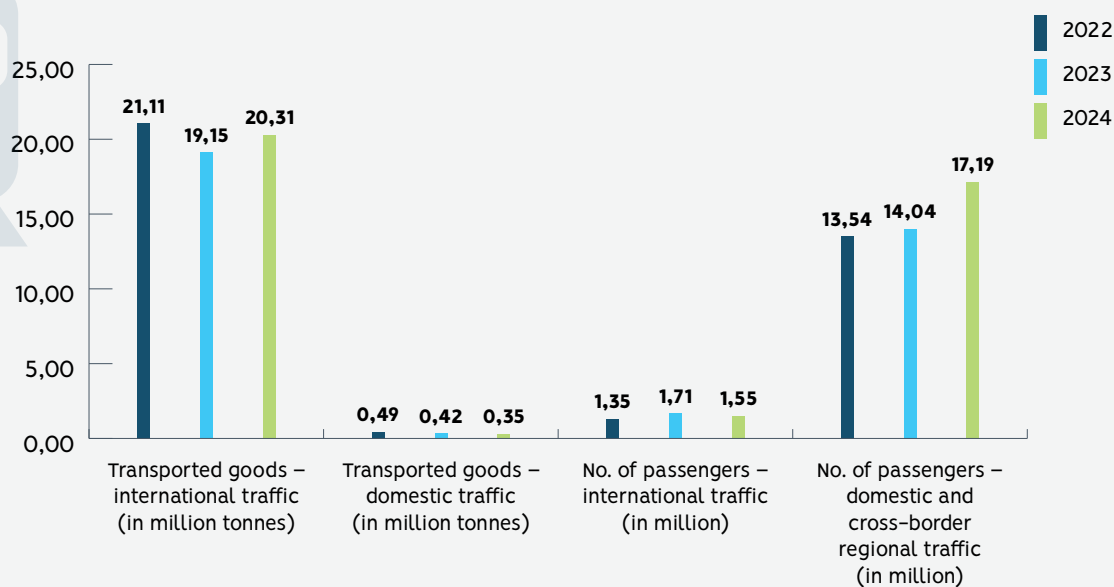
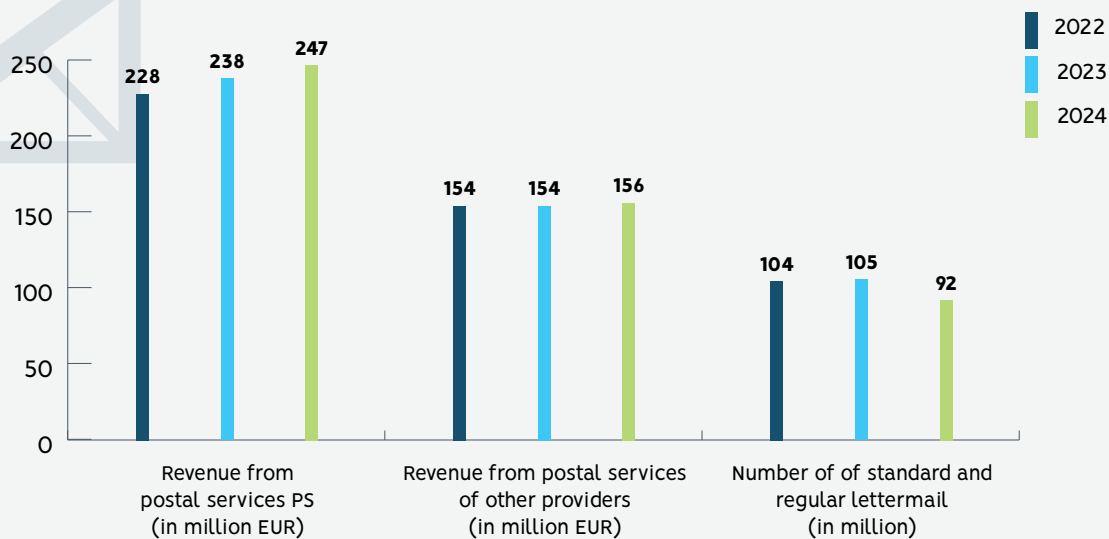
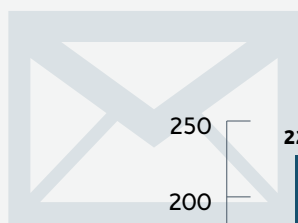


ON-DEMAND AVMS



DIGITAL SERVICE PROVIDERS





V BACKGROUND PAPERS

Background papers in areas that fall within the Agency's competencies are comprised of EU regulations adopted by the European Council and the European Parliament, which are directly applicable in Slovenia, laws adopted by the National Assembly, as well as by-laws adopted by the government (decrees), ministries (rules), or the Agency itself (general acts, recommendations) adopts. Because Slovenia is part of the European legal order, sectoral Acts are based on EU directives that have been transposed into Slovenian legal order. In its work the Agency takes into consideration the recommendations and guidelines from the European Commission, as well as international Acts that are valid in the Republic of Slovenia.

Electronic communications:

- | Electronic Communications Act (Official Gazette of the Republic of Slovenia no. 130/22 and 18/23-ZDU-10).

Electronic media:

- | Media Act – ZMed (Official Gazette of the RS, no. 110/06 – official consolidated text, 36/08 – ZPomK-1, 77/10 – ZSFCJA, 90/10 – Constitutional Court decision, 87/11 – ZAVMS, 47/12, 47/15 – ZZSDT, 22/16, 39/16, 45/19 – Constitutional Court decision, 67/19 – Constitutional Court decision and 82/21);
- | Audiovisual Media Services Act – ZAVMS (Official Gazette of the RS, no. 87/11, 84/15 and 204/21);
- | Act Regulating the Accessibility of Products and Services for Persons with Disabilities – ZDPS (Official Gazette of the RS, no. 14/23).
- | European Media Freedom Act (EU Official Journal No. 2024/1083);
- | EU Regulation on the transparency and targeting of political advertising (2024/900).

Digital services:

- | Regulation (EU) 2022/2065 of the European Parliament and Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act; EU OJ no. 277 of 27 October 2022)
- | Act implementing Regulation (EU) on a Single Market For Digital Services – ZIUETDS (Official Gazette of the Republic of Slovenia, No. 30/24 and 95/24 – ZIUORTSV).

Dissemination of terrorist content:

- | Act implementing Regulation (EU) on addressing the dissemination of terrorist content online (ZIUORTSV) (Official Gazette of the RS, no. 95/24)
- | Regulation (EU) 2021/784 of the European Parliament and of the Council of 29 April 2021 on addressing the dissemination of terrorist content online

Postal services:

- | Postal Services Act – ZPSto-2 (Official Gazette of the Republic of Slovenia no. 51/09, 77/10, 40/14 – ZIN-B and 81/15).

Railways:

- | Regulation (EU) 2021/782 of the European Parliament and of the Council of 29 April 2021 on rail passengers' rights and obligations (OJ L no. 172 of 17 May 2021, p. 1)
- | Commission Implementing Regulation (EU) 2018/1795 of 11 November 2018 laying down procedure and criteria for the application of the economic equilibrium test pursuant to Article 11 of Directive 2012/34/EU of the European Parliament and of the Council (OJ L no. 294 of 21 November 2018, p. 5)
- | Commission Implementing Regulation (EU) 2017/2177 of 22 November 2017 on access to service facilities and rail-related services (OJ L 307, 23.11.2017, p. 1)
- | Commission Implementing Regulation (EU) 2016/545 of 7 April 2016 on procedures and criteria concerning framework agreements for the allocation of rail infrastructure capacity (OJ L 94, 8.4.2016, p. 1)
- | Commission Implementing Regulation (EU) 2015/1100 of 7 July 2015 on the reporting obligations of the Member States in the framework of rail market monitoring (OJ L 181, 9.7.2015, p. 1)

- Commission Implementing Regulation (EU) 2015/909 of 12 June 2015 on the modalities for the calculation of the cost that is directly incurred as a result of operating the train service (OJ L 148, 13.6.2015, p. 17)
- Regulation (EU) No 913/2010 of the European Parliament and of the Council of 22 September 2010 concerning a European rail network for competitive freight (OJ L 276, 20.10.2010, p. 22)
- Railway Transport Act – ZZelP (Official Gazette of the RS, no. 99/15 – official consolidated text, 30/18, m 82/21, 54/22 – ZUJPP and 18/23 – ZDU-10)
- Regulation on train path allocation, usage fee and efficiency regime on public rail infrastructure (Official Gazette of the Republic of Slovenia, no. 8/23).
- General act on setting the deadline for responding to requests for additional services in railway traffic (Official Gazette of the Republic of Slovenia, no. 52/18)
- Regulation on the Implementation of Regulation (EC) No. 1371/2007 on the rights and obligations of passengers in railway transport (Official Gazette of RS, no. 67/11)

Radio spectrum:

- Electronic Communications Act (Official Gazette of the Republic of Slovenia no. 130/22 and 18/23–ZDU-10).
- Radiotelevizija Slovenija Act – ZRTVS-1 (Official Gazette of the RS, no. 96/05, 109/05 – ZDavP-1B, 105/06 – Constitutional Court decision – ZIPRS0809-B, 9/14 and 163/22);
- Act Ratifying the European Transfrontier Television Convention and the Protocol amending the European Transfrontier Television Convention (MEKTC) (Official Gazette of the Republic of Slovenia – International treaties, no. 18/99);
- Act Ratifying the Regional Agreement Relating to the Use of the Band 87.5 108 MHz for FM Sound Broadcasting (Region 1 and Part of Region 3) /MOSUPZR/ (Official Gazette of the Republic of Slovenia – International treaties, no. 5/97);
- Decree ratifying the FINAL ACTS of the Regional Radiocommunication Conference for planning of the digital terrestrial broadcasting service in parts of Regions 1 and 3, in the frequency bands 174–230 MHz and 470–862 MHz (RRC-06) (Official Gazette of the RS – International treaties, no. 6/13);
- Regional Agreement for the European Broadcasting Area concerning the use of frequencies by the broadcasting service in the VHF and UHF bands, signed in Stockholm 23 June 1961 (The Act on the Succession of Conventions of the United Nations Commission on International Trade Law and International Treaties of the International Telecommunication Union (Official Gazette of the Republic of Slovenia, no. 19/93));
- Act Ratifying the Chester 1997 Multilateral Coordination Agreement relating to Technical Criteria, Coordination Principles and Procedures for the introduction of Terrestrial Digital Video Broadcasting (DVB-T) (MCVUTV) (Official Gazette of the RS – International treaties, no. 12/05).
- Technical Requirements for Products and Conformity Assessment Act – ZTZPUS-1 (Official Gazette of the Republic of Slovenia No. 17/11 and 29/23)

Other important acts:

- General Administrative Procedure Act – ZUP (Official Gazette of the Republic of Slovenia, no. 24/06 – official consolidated text, 105/06–ZUS-1, 126/07, 65/08, 8/10, 82/13, 175/20 – ZIUOPDVE and 3/22 – ZDeb);
- Inspection Act – ZIN (Official Gazette of the RS 43/07– official consolidated text and 40/14)
- Minor Offences Act – ZP-1 (Official Gazette of the Republic of Slovenia, no. 29/11 – official consolidated text, 21/13, 111/13, 74/14 – Constitutional Court decision, 92/14 – Constitutional Court Decision, 32/16, 15/17 – Constitutional Court decision, 73/19 – Constitutional Court decision, 175/20 – ZIUOPDVE, and 38/24);
- Administrative Dispute Act – ZUS-1 (Official Gazette of the Republic of Slovenia, no. 105/06, 107/09 – Constitutional Court Decision, 62/10, 98/11 – Constitutional Court Decision, 109/12 – ZPP-E and 49/23);
- Public Information Access Act – ZDIJZ (Official Gazette of the Republic of Slovenia, no. 51/06 – official consolidated text, 117/06 – ZDavP-2, 23/14, 50/14 and 19/15 – Constitutional Court decision, 102/15, 7/18 and 141/22);
- Information Commissioner Act – ZInfP (Official Gazette of the Republic of Slovenia, no. 113/05 and 51/07 – ZUstS-A);
- Public Agencies Act – ZJA (Official Gazette of the Republic of Slovenia, no. 52/02, 51/04–EZ-A, 33/11–ZEKom-C);
- State Administration Act – ZDU-1 (Official Gazette of the Republic of Slovenia, no. 113/05 – official consolidated text, 89/07 – Constitutional Court decision, 126/07–ZUP-E, 48/09, 8/10–ZUP-G, 8/12–ZVRS-F, 21/12, 47/13, 12/14, 90/14, 51/16, 36/21, 82/21, 189/21, 153/22 and 18/23);

- Civil Servants Act – ZJU (Official Gazette of the Republic of Slovenia, no. 63/07 – official consolidated text, 65/08, 69/08–ZTFI–A, 69/08–ZZavar–E, 40/12–ZUJF, 158/20 – ZIntPK–C, 203/20 – ZIUPOPDVE, 202/21 – Constitutional Court Decision and 3/22 – ZDeb);
- Protection of Documents and Archives and Archival Institutions Act ZVDAGA (Official Gazette of the Republic of Slovenia, 30/06 and 51/14)
- Public Procurement Act – ZJN–3 (Official Gazette of the RS, no. 91/15, 14/18, 121/21 10/22, 74/22 – Constitutional Court decision, 100/22 – ZNUZSZS, 28/23, 88/23 – ZOPNN–F
- Integrity and Prevention of Corruption Act – ZintPK (Official Gazette of the Republic of Slovenia, no. 69/11 – official consolidated text, 158/20, 3/22 – ZDeb and 16/23 – ZZPri);
- Reporting Persons Protection Act (Official Gazette of the RS, no. 16/23);
- Public Finances Act – ZJF (Official Gazette of the RS, no. 11/11 – official consolidated text, 14/13 – correct., 101/13, 55/15 – ZFisP, 96/15 – ZIPRS1617, 13/18, 195/20 – Constitutional Court decision, and 18/23 – ZDU–10);
- Information Security Act (Official Gazette of the Republic of Slovenia, no. 95/21 and 18/23 – ZDU–10);
- Electronic Commerce Market Act – ZEPT (Official Gazette of the RS, no. 96/09 – official consolidated text, 19/15, 189/21 – ZDU–1M, 18/23 – ZDU–10 and 30/24 – ZIUETDS);

VI INTERPRETATION OF THE LEGEND OF ACHIEVEMENT OF THE AGENCY'S SET OBJECTIVES

Below are the Agency's 5 strategic objectives – encouraging competition and market development, protecting the users and ensuring universal service, ensuring the optimum use of a limited public resource, increasing efficiency and decreasing regulatory limitations, and optimization of investments – presenting the planned tasks and activities that the Agency planned in its 2024 Operational and Financial Plan. The tables outline key tasks and activities that were planned and are conducted as permanent tasks throughout the whole year. These are frequently dependant on submissions or external reports. Because the Agency follows market trends in its activities for fulfilling the set objectives, its activities or priorities of planned activities may change throughout the year, which the Agency then discloses in its Annual Report.





RESULT







■ According to plan
 ■ Partly according to plan
 ■ Not to plan

VII MANAGING A LIMITED RE-SOURCE

1 ANNUAL GOALS AND THE STATE OF THE MARKETU

TABLE 1: KEY OBJECTIVES: ENSURING OPTIMUM USE OF A LIMITED RESOURCE

Task/Project	Activities	Objectives	KPI	Result	Comment
Radio frequency spectrum management strategy	Performing campaigns.	Following the goals and reviewing the achievements.	Review of completion by 31 December 2024.		Review completed, some minor discrepancies, because technology is not available yet.
Public tenders for radio frequencies for public mobile communication services	Public tender in radio frequency spectrum in the 2300 and 3600 MHz bands for local use.	Issuing DARFs.	Issuing DARFs in the Q1 of 2024.		DARFs issued on 14 June 2024 because of T-2's request for reassigning existing frequencies in the 2300 MHz band with regard to the result of the public tender.
	Inquiry of interest for the 410–430 MHz and the 40.5–43.5 GHz bands and the remainder of the civilian 26 GHz band.	Inquiring of the demand for market interest.	Publishing opinions of stakeholders in Q4 of 2024.		Because there were no responses from stakeholders regarding the 410 MHz band, the Agency did not conduct an inquiry for demand. It did change the regulation (see Section 2.2.4). Regarding the 40.5–43.5 GHz and the remainder of the civilian 26 GHz band, the Implementing decision (EU) 2024/1983 was adopted in July 2024. The Agency will hold the inquiry into demand when the terminals become available, by Q2 of 2026.
Public tenders for radio frequencies for audio broadcasting	Public tender for assigning FM frequencies.	Ensuring that listeners have a diverse and interesting range of available radio stations.	Holding a public tender by 31 December 2024.		Completing the public tender by Q1 2023, publishing and holding the tender in Q1 2024, with decisions issued in Q2 2025.

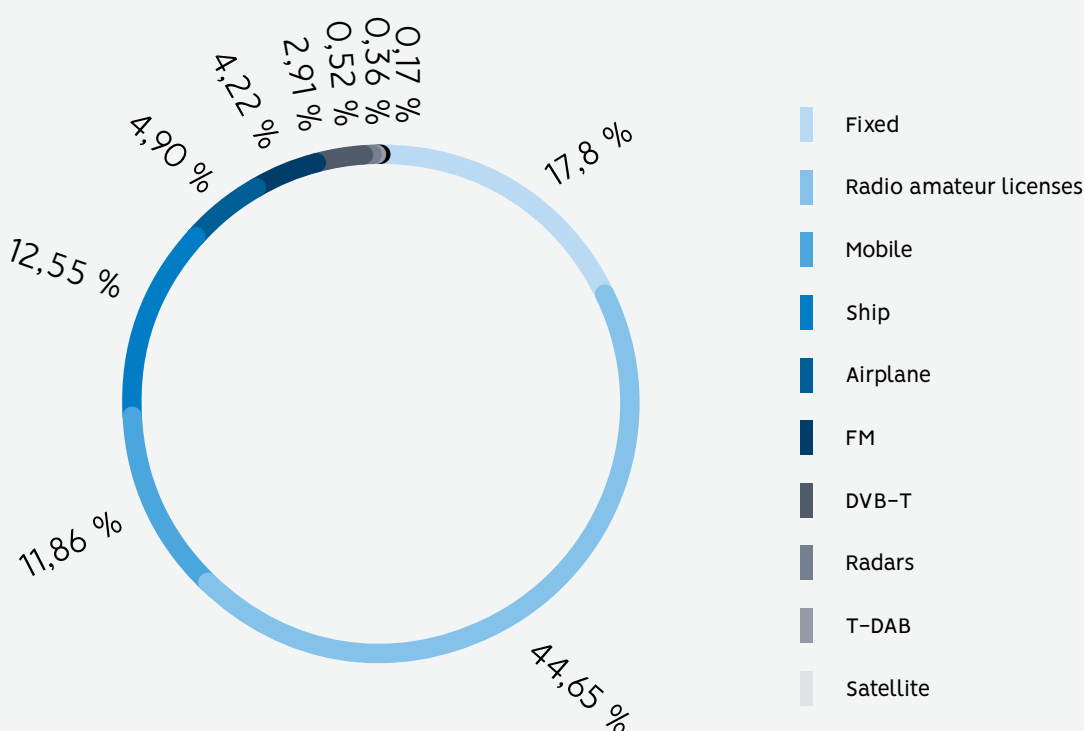
Procedures according to Article 47 of ZEKom-2	Awarding BWA in the 28 GHz band for campuses and factories.	Preparing the document for obtaining the opinions from the interested public.	Publishing opinions of stakeholders in Q4 of 2024.		The Agency has prepared the first draft of the document; however, it will wait with the publication for the availability of mobile terminals (see section 2.2.2).
	Awarding spectrum for M2M in the 700 MHz band for business critical services for local/regional use;	Preparing the document for obtaining the opinions from the interested public and continuing the procedure.	For M2M, MMDS/BWA and P-P links, publication of opinions of the interested public in Q1 2024, preparation of Tender documentation or the start of issuing the DARF in Q3 2024, potential public tenders in 2025.		On 4 April 2024 the Agency held a meeting with stakeholders where interest was confirmed. The tender was published on 24 June 2024; however, the Agency did not receive any bids. The spectrum was not awarded.
	Awarding the spectrum for MMDS/BWA in the 10 GHz and 12 GHz bands for regional use	Preparing the document for obtaining the opinions from the interested public and continuing the procedure.	Publication of opinions of the interested public in the fourth quarter of 2024.		On 12 July 2024 a call for expressing interest was published, however, as there was no exceeding demand for any of the blocks in any of the regions, the public tender was not required. The Agency issued 4 DARFs in Q4 2024.
	Awarding the spectrum in parts of the 80 GHz, 38 GHz, 32 GHz (instead of 26 GHz), 23 GHz, 18 GHz, 15GHz, 13 GHz, 11 GHz, 6 GHz_L bands for the territory of Slovenia.	Preparing the document for obtaining the opinions from the interested public and continuing the procedure.			The Agency published information on the reallocation of frequencies for P-P fixed links on 3 June 2024 and initiated an ex officio administrative procedure, amended the DARF and issued 5 new DARFs in December 2024. The Agency has prepared an online interface for directly entering active P-P fixed links, which are also graphically displayed on the Geoportal.
	Awarding the spectrum in the 3800–4200 MHz band for verticals, i.e. awarding them for technological/service neutral local use.	Preparing the document for obtaining the opinions from the interested public.			Because of the delay in the adoption of technical regulations at the European level, the Agency consequently had to postpone the publication of the prepared document for obtaining opinions of the interested public to 2025.
Awarding the spectrum for PPDR	Consultation with stakeholders regarding the procedure for granting PPDR frequencies in the part of the spectrum for state use on 450–470 MHz and 700 MHz.	Preparing procedure together with the relevant ministries.	Agreement on the procedure by the end of 2024.		The Agency did not receive the initiatives of the relevant ministries. Consequently, it focused on the harmonisation and international coordination of the 450–470 MHz radio frequency band.

World Radio Conference WRC-23	Preparing the draft for Directive on the allocation of frequency bands and NURF in line with WRC 2023 decisions.	Pursuing the goals and interests of the Republic of Slovenia in accordance with the resolution of the Government of RS.	Draft Decision by 30 June 2024, NURF by 31 December 2024.	<div></div>	The official publication of the WRC conclusions was published only in the second half of 2024. Only after that could the Agency prepare a draft decree, which it sent to the relevant ministry in January 2025. It also prepared two changes to NURF.
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1.1 RADIO SPECTRUM UTILISATION

At the end of 2024 there were 380 decisions on awarding radio frequencies for audio broadcasting (DARF), 262 decisions for terrestrial digital video broadcasting (DVB-T, 32 decisions for digital terrestrial audio broadcasting (T-DAB), 15 for satellite system communications, 55 for radars, 1087 for ships and 480 for airplanes, 1086 decisions for mobile connections, and 4484 amateur radio licenses in force, while the number of decisions for microwave links decreased from 7902 to 1608 due to the ex officio rearrangement procedure, which is described in more detail in section 2.2.8 Frequencies for microwave links.

FIGURE 5: SHARE OF VALID DECISIONS ON ASSIGNING RADIO FREQUENCIES AT THE END OF 2024



At the end of 2024 one T-DAB+ network with national coverage was in operation, namely multiplex R1 with no available capacities. The regional multiplex R2 is divided into East and West regions, which together cover the whole of the Republic of Slovenia. Multiplex R3 covers the area of Ljubljana. All three networks are managed by RTV Slovenija. In 2024, the Agency conducted a public tender for the construction of two new national networks, the R4 and the R5. The public institution RTV Slovenija was the sole bidder and also obtained decisions on the awarding radio frequencies for these two networks.

A long-exposure photograph of a city street at night. The foreground shows a multi-lane road with light trails from moving vehicles. A bright street lamp is visible on the left side of the road. In the background, several tall, modern buildings are illuminated against the dark night sky. The overall scene is a vibrant urban landscape.

In 2024 the Agency's main priority

in radio frequency spectrum management was once again preparing the public tender with a public auction for the available radio frequencies for providing public communication services for local use

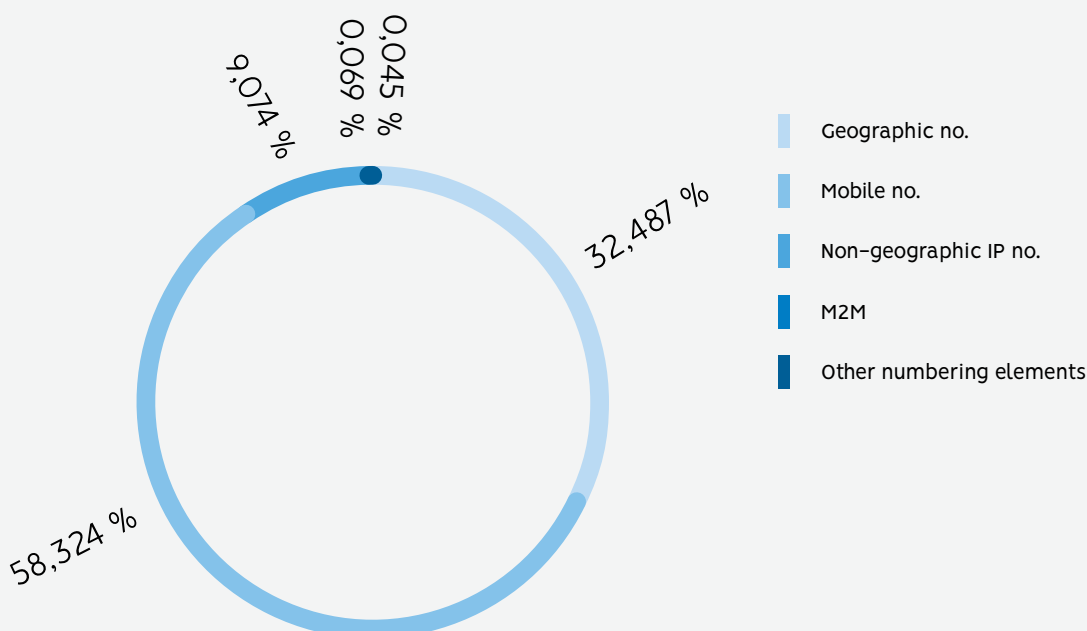
The operator of both national DVB-T networks is also RTV Slovenija. Multiplex A is intended for public channels and channels with the status of special significance, while Multiplex C, which only included two free-to-air channels, has become unsustainable after pay-TV channels exited, and the network operator opted to switch it off on 1 February 2024.

There are also two local multiplexes operational, one for the area of Litija, and the second one for the area between Ravne na Koroškem and Celje. The state of the spectrum in public communication services remained unchanged in 2024, as no new parts of the spectrum were awarded. However, the Agency concluded a public tender with a public auction for awarding radio frequencies in the 2300 MHz and 3600 MHz radio frequency bands for local use, in which 9 bidders were successful.

1.2 NUMBERING SPACE UTILISATION

As at 31 December 2024 the Agency's official registry included 23 operators and 11 other providers who were assigned various numbering elements. At the end of 2024 there were a total of 391 issued and valid decisions on assigning numbering elements, while the number of assigned numbering elements was 14,469,000.

FIGURE 6: THE NUMBER OF ASSIGNED NUMBERING ELEMENTS AT THE END OF 2024



Based on the status of awarded numbering resources at the end of 2023, the Agency noted the following developments related to individual numbering types in 2024:

- Geographic numbers: the scope increased by 0.21 %.
- Non-geographic numbers for IP telephony services: the scope remained unchanged.
- Mobile numbers: the scope increased by 0.60 %.
- M2M numbers: the scope remained unchanged.
- Numbers for toll-free services: the scope decreased by 0.47 %.
- Numbers for premium services: the scope decreased by 0.42 %.
- National signalling point codes (DPC): the scope increased by 1.49 %.
- Numbers for access to special networks: the scope remained unchanged.
- National destination codes: the scope increased by 8.06 %.
- Mobile network codes: the scope remained unchanged.
- Routing codes: the scope remained unchanged.

The number of ported telephone numbers increased by almost 29 % in 2024 compared to the previous year, which again shows that number portability makes it easier for end-users to change providers, and this contributes to

competitive conditions in the retail market. A total of 215,843 numbers were ported, of which 193,336 were mobile and 22,507 were fixed-line numbers. Since the introduction of portability at the beginning of 2006, a total of 2,923,792 numbers were ported. The total number of ported numbers as of 31 December 2024 is 1,406,185, of which 904,565 are mobile and 501,620 are fixed-line numbers, representing 31.9 % of active mobile and 57 % of active fixed-line numbers. The Agency receives the data on number porting through the update website of the administrator of the central database of ported numbers.

2 ACTIVITIES FOR ACHIEVING THE OBJECTIVES

2.1 REGULATION

The Agency had prepared an analysis of the implementation of the Radio Frequency Spectrum Management Strategy for the 2021–2023 period already at the end of 2022, as this formed the basis for the design of the subsequent Radio Frequency Spectrum Management Strategy 2024–2027. At the end of 2023, the Agency forwarded the proposal to the Government of the Republic of Slovenia for its approval. The proposal of the Radio Frequency Spectrum Management Strategy for the 2024–2027 period served as a guideline for the management of the radio frequency spectrum in 2024. The Agency followed the set goals and planned projects.

Based on the conclusions of the World Radiocommunication Conference (WRC) 19, it prepared a draft Decree on the Allocation of Radio Frequency Bands and sent it to the Government of the Republic of Slovenia for adoption at the beginning of 2025.

In addition, due to the expressed interest of operators providing public communication networks or ensuring the provision of public communication services, the Agency prepared an amendment to the General act on the radio frequency utilization plan (NURF–5a) and enabled the use of the 71–74 GHz and 81–84 GHz radio frequency bands for fixed links for civilian purposes. Later, it further amended the General act on the radio frequency utilization plan (NURF–5b) due to the amended agreement for the use of the 70/80 GHz radio frequency band for point-to-point (P–P) links for the connection of mobile operators' infrastructure with the Ministry of Defence.

In 2024, the Agency also prepared an amendment to the General act on the method of calculating payments for the use of radio frequencies, which includes new provisions on factors influencing the calculation of the number of points for the use of frequencies in different frequency bands. The amendments also include a provision that the discount factors for frequencies awarded for the provision of public communication services to promote network deployment apply only to the first award of frequencies in a specific frequency band and specify specific factors for different types of frequencies for low and medium power transmitters in the 3800–4200 MHz band.

2.1.1 RADIO FREQUENCY SPECTRUM MANAGEMENT STRATEGY

In 2024, the Agency followed the Actions of the draft Strategy of radio frequency spectrum management 2024–2027, which the Government of the Republic of Slovenia confirmed in September 2024, and consequently the Agency published it on its website.

At the end of the year, the Agency prepared an overview of the implementation and made a brief summary of the key findings. With regard to spectrum tenders, the tender for the 2300 MHz and 3600 MHz bands was held ahead of the planned deadline, and the decisions were issued in the first half of 2024. The procedures for awarding the 4 GHz band will begin in 2025; spectrum for the Multimedia Multichannel Distribution System (MMDS) was awarded ahead of schedule. A public tender was held for the spectrum for machine-to-machine communication (M2M) in the 700 MHz band ahead of the planned deadline based on the expressed interest, but the Agency did not receive any bids.

The Agency completed the ex officio reallocation procedure for the spectrum for microwave links. Most of the derogations in awarding new spectrum are related to delays in international coordination and adjustments to technical requirements; otherwise, the Agency mostly implemented the planned steps and tenders in accordance with the strategy.

2.2 MOBILE SERVICES

2.2.1 AWARDING PART OF THE SPECTRUM IN THE 2300 AND 3600 MHZ FREQUENCY BANDS FOR LOCAL USE, MOSTLY FOR VERTICALS

In 2024 the Agency's main priority in radio frequency spectrum management was once again preparing the public tender with a public auction for the available radio frequencies for providing public communication services for local use, i.e. verticals. This is a public tender with a public auction of available radio frequencies for providing wireless broadband electronic communication services, mostly for verticals and/or PMSE for local use in the scope of which 50 MHz of the frequency spectrum are to be awarded.

In 2022 the Agency published the Draft of tender documentation for the public tender with a public auction for awarding radio frequencies in the 2300 MHz and 3600 MHz radio frequency bands for local use, and the comments from stakeholders to the Draft of tender documentation. Based on these it slightly changed the content of the Draft and put it into another consultation in early 2023. After obtaining the approval from the Government of RS for reserved prices, the public tender with a public auction for awarding radio frequencies in the 2300 MHz and 3600 MHz frequency bands for local use was published, with nine bidders applying. In the first phase of the public tender, focused on verticals, seven bidders participated, competing for and obtaining blocks in eight municipalities. In the second phase, Telekom Slovenije and T-2 d.o.o. participated, and in the third phase, only T-2. As there was no excessive demand in any of the municipalities for any of the tendered blocks, a public auction was not necessary, and the Agency issued the decisions on awarding radio frequencies after the completion of the administrative procedure. The procedure lasted until June 2024 due to the request of T-2 for the reallocation of awarded and existing frequencies in the 2300 MHz band based on the results of the public tender. Consequently, before issuing the DARF, the Agency prepared amendments to the DARF for Telemach and T-2 for the frequencies acquired in the 2300 MHz band, based on the public auction in 2021. As T-2 did not pay the amount for the efficient use of the limited natural resource despite a reminder, the Agency annulled the decision at the end of October 2024. A repeated tender for the unawarded part of the spectrum is planned for 2025.

TABLE 2: BIDDERS WHO OBTAINED THE PARTS OF THE SPECTRUM THROUGH THE PUBLIC TENDER AND PAID THE FEE

Bidder	Municipality	Frequency range	Fee
LUKA KOPER, d.d.	Ankaran/Ancarano	2300–2320 MHz	EUR 640
	Koper/Capodistria		EUR 10,200
CABLEX-T d.o.o.	Tržič	3400–3420 MHz*	EUR 1,400
CABLEX-M d.o.o.	Mežica	3400–3420 MHz*	EUR 340
Cinkarna CELJE, d.d.	Celje	2300–2320 MHz	EUR 9,200
CABLEX PLASTIK d.o.o.	Semič	3400–3420 MHz*	EUR 360
Municipality of Ilirska Bistrica	Ilirska Bistrica	3400–3420 MHz*	EUR 1,300
Municipality of Ajdovščina	Ajdovščina	2300–2320 MHz	EUR 3,800
Telekom Slovenije, d.d.	Celje	3400–3420 MHz*	EUR 21,000
	Koper/Capodistria		EUR 23,000
	Kranj		EUR 25,000
	Krško		EUR 11,000
	Ljubljana		EUR 130,000
	Maribor		EUR 49,000
	Murska Sobota		EUR 8,000
	Nova Gorica		EUR 14,000
	Novo mesto		EUR 16,000
	Ptuj		EUR 10,000
	Slovenj Gradec		EUR 7,300
	Velenje		EUR 14,000

2.2.2 AWARDING BWA IN THE 28 GHZ BAND

In the scope of the project for awarding frequencies for broadband wireless access (BWA) in the 28 GHz band for verticals or for technology-service neutral awarding for local use, the Agency, based on identified demand for frequency spectrum in the 2300 MHz, 3600 MHz, 3800–4200 MHz and 28 GHz frequency bands, began preparing technical basis for the 28 GHz band in 2023. The technical bases call for awarding the 28.0–28.4 GHz and 29.0–29.4 GHz frequency sub-bands for the unpaired TDD (Time Division Duplex) band for BWA for local use in 200 MHz blocks. TDD supports the use of the same frequency band for full-duplex data transmission (from the base station to the user and vice versa) by alternately allocating time slots, which allows for flexible and efficient use of the spectrum according to needs.

Following the inquiry conducted among equipment manufacturers in 2023 and 2024, the Agency established that the equipment of all three base station manufacturers supports use in the 26.5–29.5 GHz range, while smartphones mostly do not yet support these bands (including 28 GHz), and for now, mainly fixed wireless devices are available. The Agency will conduct a survey regarding market interest in the 28 GHz band when stakeholders expressly initiate the use of this band.

When reviewing the start of operations of 26 GHz networks, EU member states reported that in the EU, mobile terminals that would support 3GPP bands FR2-1 (24250–52600 MHz) and FR2-2 (52600–71000 MHz) are not available. The Agency proposed to the European Commission at the meetings of the Radio Spectrum Committee (RSCoM) and the EU Radio Spectrum Policy Group (RSPG) that it examine the situation and issue recommendations to the member states. The Agency prepared the first draft of the document to obtain the opinions from stakeholders and decided to publish the document only when mobile terminals supporting 3GPP bands (24250–52600 MHz) are available.

2.2.3 AWARDING FREQUENCIES IN THE 3800–4200 MHZ BAND

Awarding frequencies in the 3800–4200 MHz band for verticals, i.e. awarding them for technological/service neutral local use is one of the key projects for 2025. Based on results of demand for frequency spectrum in the 2300 MHz, 3600 MHz, 3800–4200 MHz and 28 GHz frequency bands, the Agency in 2023 and 2024, the Agency headed a working group, as part of the Electronic Communications Committee (ECC), which, with the aim of promoting the efficient and harmonised use of spectrum and the development of common European solutions within the European Conference of Postal and Telecommunications Administrations (CEPT), is responsible for the coordination of policies and technical standards in the field of radio spectrum, telecommunications and other electronic communications in Europe. The goal of the group was to prepare the technical regulation for the use of the 3800–4200 MHz band. This group prepared ECC Report 35. The Agency also actively participated in other ECC groups that prepared the documents ECC Decision ECC/DEC/(24)01, which harmonises the radio frequency band at CEPT level, ECC Report 362 on the protection of radio altimeters in the 4200–4400 MHz band and CEPT Report 88. The ECC adopted these documents in November 2024, and they will form the basis for the EU implementing decision, planned for adoption in July 2025.

In addition to activities at the international level, the Agency was also preparing a draft document that will serve as the basis for the award of spectrum in the 3800–4200 MHz band in the Republic of Slovenia; however, due to the ECC's delay in adopting the technical regulation, the Agency postponed its publication to 2025.

2.2.4 THE DEVELOPMENT OF INFRASTRUCTURE FOR CRITICAL COMMUNICATION

In relation to awarding radio frequencies in the 410–430 MHz band for verticals or for technological/service neutral local use for the territory of the Republic of Slovenia, and the planned assistance to relevant bodies in awarding the spectrum for public protection and disaster relief (PPDR) services in the 450 MHz and the 700 MHz bands, the Agency continued in 2024 with endeavours for adopting multilateral agreements for the 400 MHz bands for broadband services among the countries participating in the HCM agreement². The Agency did not receive any requests from the relevant ministries in 2024.

² The HCM agreement is an agreement between 17 Central European countries (Austria, Belgium, Czechia, France, Hungary, Germany, the Netherlands, Croatia, Italy, Liechtenstein, Lithuania, Luxembourg, Poland, Romania, the Slovak Republic, Slovenia and Switzerland) for coordinating fixed and mobile connections in the 29.7 MHz to 43.5 MHz bands (https://hcm.bundesnetzagentur.de/vertrag/englisch/e_pdf14.zip)

The Agency continued moving narrowband systems from the following sub-bands 410–417 MHz/420–427 MHz and 450–457.5/460–467.5 MHz to the remaining part of the radio frequency bands 440–450 MHz, 450–470 MHz and 410–430 MHz in accordance with the valid General act on the radio frequency utilization plan (NURF). For the 410–430 MHz band (hereinafter: the 410 MHz band) and for the 450–470 MHz band (hereinafter: the 450 MHz band) the Agency sent the proposal for a preference agreement to HCM members. Because of the large number of DARFs for PMR that would have to be reassigned, the members are not yet prepared to adopt the agreement, as it would require them to free the bottom 2 x 7 MHz of the spectrum for the 2 x 5 MHz channel (the 3GPP band 87: 410–415 MHz UL, paired with 420–425 MHz DL), and the 2 MHz protection band, i.e. 2 x 7.5 MHz of spectrum for the 2 x 5 MHz channel (3GPP band 72: 451–456 UL, paired with 461–466 DL), and 1.5 MHz protection band.

At the beginning of 2024, the Agency sent a proposal for preferential agreements for the 410–430 MHz and 450–470 MHz bands to Germany, France, the Netherlands and neighbouring countries, and presented its positions on the harmonisation of these bands at the RSCoM-86 and HCM meetings. At the RSPG Peer Review meeting, the Agency presented a proposal for the harmonisation of the 410–430 MHz and 450–470 MHz bands for broadband systems and proposed a new allocation of physical cell identifiers (PCI) codes among member states. At the Working Group Frequency Management (WGFM) meeting within CEPT, following the Agency's proposal, an amendment to the recommendation for a more optimal allocation of PCI codes was adopted. The Agency took over the leadership of a correspondence group within WGFM, which will prepare an update of this recommendation in 2025 and propose amendments to two ECC decisions for PPDR and terrestrial mobile systems in the part relating to the 400 MHz bands.

The survey regarding market interest for the 410 MHz band was planned for 2024, but the Agency did not receive any initiatives from stakeholders. It also did not receive any initiatives for the award of spectrum for PPDR in the 450 MHz and 700 MHz bands.

2.2.5 RADIO FREQUENCIES FOR PUBLIC MOBILE TECHNOLOGY AVAILABLE ACCORDING TO WRC-23

In accordance with the Agency's Operational and Financial Plan, the Agency prepared a proposal for the Regulation on the allocation of radio frequency bands based on the WRC 2023 resolutions and sent it to the Government of the Republic of Slovenia in 2025. Based on this proposal, the Agency has already prepared a draft General act on the radio frequency utilization plan NURF-6. In 2024, it prepared and published amendments NURF-5a and NURF-5b, due to the reallocation of radio frequencies for P-P fixed links in the 71–74 GHz and 81–84 GHz bands.

During the review of network operations in the 26 GHz band, EU member states reported that mobile terminals supporting 3GPP bands FR2-1 (24250–52600 MHz) and FR2-2 (52600–71000 MHz) are not available. The FR2-1 and FR2-2 bands fall within the higher frequency range of 5G technology (millimetre waves), which enables high data transfer rates and low latency. Since suitable terminals are not available, the use of the 26 GHz band is practically impossible. At the RSCoM and RSPG meetings, the Agency proposed that the EC examine the situation and propose appropriate solutions that would enable the exploitation of this frequency band.

The deadline for the implementation of Implementing Decision (EU) 2024/1983 was postponed for the EU, due to the unavailability of terminals, from the original 6 months after the adoption of the implementing decision to the end of 2026. Because of the above, and also because there is no initiative for a tender for these two bands, the Agency decided to conduct the survey when the terminals become available, or at the latest in 2026.

2.2.6 BROADCASTING AND 5G

The Agency held a workshop on the development of 5G radio broadcasting and 5G television broadcasting over Internet Protocol (IPTV) in the RS (Allotments) awards according to the Geneva 2006 (GEO6) Agreement. Representatives from various organisations attended the event, namely the EC, the EU Radio Spectrum Policy Group (RSPG), the RSPG working group on the use of the 470–694 MHz spectrum after 2030, the Ministry of Digital Transformation, the European Broadcasting Union (EBU), the GSM Association (GSMA), as well as regulators and manufacturers of transmitters, base stations and chips.

Television broadcasters from Germany (ARD), Italy (RAI), and Croatia held presentations on 5G radio broadcasting tests, while the Finnish television broadcaster YLE presented an experience according to which unicast IPTV distribution is more suitable for 95% of viewers. For 5% of the population living in remote areas, additional spectrum for 5G distribution would be needed, using their GEO6 awards for distribution via mobile operators. Based on the workshop's findings, the Agency proposed testing 5G via IPTV on channel 41 in the 3GPP band 71, as well as cross-border testing of coexistence and synergy between 5G radio broadcasting and 5G via IPTV. However, it has not yet received an initiative from any stakeholder for such testing.

2.2.7 MONITORING THE PROVISION OF PUBLIC COMMUNICATION SERVICES

The Agency published the Report on fulfilling obligations and coverage with mobile service technologies based on the operators' data from January 2024, which also included 5G coverage. The Agency notes that 5G technology is still in the introductory phase. The implementation of 5G primarily relies on the non-standalone mode (NSA), where the end user's terminal equipment connects to both the primary LTE base station (eNodeB) and the secondary 5G base station (GnodeB), with the user's terminal initially connecting to the network via the LTE base station, and the connection to the 5G base station being used only as backup for data transmission. Consequently, the Agency's report only provides approximate coverage with 5G/NR (New Radio) signals, focusing on the range of base stations that support high-speed data transmission services. Operators provide 5G services in line with their business models in 700 MHz, 2300 MHz, 2600 MHz, and 3600 MHz frequency bands. With the aim of monitoring mobile network upgrades, the Agency decided to again obtain data from operators on the status of the use of radio frequency channels per individual base station cell of radio systems. The Agency carried out a detailed verification of the content, values and format of the transmitted data in terms of moving towards the introduction of future electronic real-time data exchange. The report will be completed in 2025.

2.2.8 FREQUENCIES FOR MICROWAVE LINKS

In line with the 2024–2026 strategy, the Agency carried out activities related to the optimisation of the use of frequency bands for microwave links. The purpose of these activities was to ensure efficient spectrum management to support 5G networks, the distribution of broadcasting channels, and the connection of mobile network base stations and private systems.



At the beginning of 2023, the Agency began preparing an analysis of the use of fixed links in the 6 GHz_L, 7 GHz_L, 8 GHz_L, 11 GHz, 13 GHz, 15 GHz, 18 GHz, 23 GHz, 32 GHz, 38 GHz and 70–80 GHz bands, with the goal of optimising the radio frequency spectrum and enabling broadband fixed links in view of the increased capacity needs. It prepared a draft for the reallocation in the bands where it is awarded to holders of decisions on awarding radio frequencies (DARFs), which are mostly operators, namely A1 Slovenija, Telekom Slovenije, Telemach Slovenija and T-2, and the public institution RTV Slovenija. The Agency prepared draft document for the reallocation in the bands and published it in June 2024. After receiving comments, it initiated the procedure for amending the DARFs ex officio, and by the end of the year, it had issued 5. With these, it awarded individual frequency bands for the entire territory of the Republic of Slovenia to the operators, and annulled the previous decisions. Before issuing the DARFs, the Agency also prepared an online application for the registration of active point-to-point fixed links, which are also visible on the AKOS Geoportal. With this action, the Agency made it possible for operators to plan individual fixed links within the radio frequency bands they were awarded, while taking into account the already registered connections

2.3 BROADCASTING

At mid 2024, the Agency concluded a public tender for analogue audio broadcasting – general 2023/1, awarding nine frequencies to 8selected providers, namely:

TABLE 3: BIDDERS WHO OBTAINED THE PARTS OF THE SPECTRUM THROUGHT THE PUBLIC TENDER AND PAID THE FEE

Location	Frequency	Bidder/Publisher	Station
Ajdovščina	91.8 MHz	RADIO ROBIN d.o.o.	RADIO ROBIN
Blejska dobrava	89.5 MHz	RADIO ANTENA d.o.o.	RADIO ANTENA
Vogel	107.8 MHz	RADIO GORENC d.o.o.	RADIO GORENC
Vogel	92.6 MHz	RADIO OGNIŠČE d.o.o.	Radio Ognjišče
Vogel	104.1 MHz	RADIO ANTENA d.o.o.	RADIO ANTENA
Vogel	105.1 MHz	RADIO KRANJ d.o.o.	RADIO KRANJ
Postojna	101.8 MHz	RADIO PRO 1 d.o.o.	Radio 1 Primorska, ENA NG,
Postojna	94.7 MHz	RADIO CAPRIS d.o.o.	RADIO CAPRIS
Kozina	107.9 MHz	RADIO OGNIŠČE d.o.o.	Radio Ognjišče.
Logatec	95.8 MHz	INTERTEH d.o.o.	RADIO 1 KRIM; ENA VR

In light of the fact that there is still demand for available FM frequencies, the Agency commenced the preparation of conditions and criteria for a public tender for the awarding radio frequencies for analogue audio broadcasting – general 2024/1. It included six radio frequencies: Slovenj Gradec 104.6 MHz, Slovenj Gradec 105.4 MHz (merged into the Slovenj Gradec block), Velenje 4 88.5 MHz, Mozirje 105.7 MHz, Ribnica 104.2 MHz and Krško 3 107.3 MHz. Following a positive preliminary opinion from the Broadcasting Council and the consent of the Ministry of Culture, the Agency published the public tender in July 2024. It received 25 bids, and the conclusion of the tender is planned for 2025.

2.3.1 DIGITAL TERRESTRIAL RADIO

At the end of 2024 one DAB+ network with national coverage was operational, the multiplex R1, and one regional network, the multiplex R2, (divided into two regions: East and West, together covering the whole territory of the Republic Slovenia), and one local network, the multiplex R3, with local coverage of the city of Ljubljana. The capacity of multiplex R1 was full with 16 stations, while in multiplex R2, while at the end of 2024 there were 17 stations broadcasting in the East region, and 14 in the West region, and 5 stations broadcasting over the R3 network. Most radio stations that were already available in analogue technology are now also available over digital networks with better sound quality and without interference. The local multiplex R3 is relatively empty, as it currently hosts only 5 stations. All three networks are managed by RTV Slovenija. In 2024, twelve broadcasting locations were

issued for the multiplex R1, and one for R2. In the second half of 2024 the Agency completed the public tender for awarding radio frequencies for terrestrial digital radio broadcasting networks T-DAB+ for the whole territory of the Republic of Slovenia (multiplexes R4 and R5). Two radio frequencies for multiplexes R4 and R5 were awarded to the only bidder, RTV Slovenija. At the end of 2024 the Agency the DARFs for 19 broadcasting locations for each multiplex R4 and R5.

2.3.2 DIGITAL TERRESTRIAL TELEVISION

At the end of 2024, only one national DVB-T network was still operating, the operator of which is RTV Slovenija. Multiplex A is intended for the transmission of national channels and regional channels with the status of special significance. Due to the decreasing demand for terrestrial television broadcasting, multiplex C was shut down. Following the application of the decision holder, RTV Slovenija, the Agency annulled the decision for multiplex C in January 2024.

In addition to the national multiplex, two local multiplexes are operating; one covers the Litija area, and the Agency extended the validity of the other one, which covers the area between Ravne na Koroškem and Celje, in 2024.

2.4 OVERVIEW OF STANDARD OPERATIONS

In radio frequency spectrum management the Agency issued 2823 decisions on awarding radio frequencies (DARF), 2756 decisions on ascertaining points (DAP), 1688 collective decisions on the payment for the use of a limited natural resource for 10762 DARFs, 107 coordinations and 36 other administrative acts.

In 2024 the Agency issued 11 new decisions for frequencies for satellite news gathering/occasional use (SNG/OB). The decisions were issued relating to major events and sport matches. In 2024 the Agency processed 1958 decisions for fixed connections (microwave connections), and issued 1391 new decisions on awarding radio frequencies. The Agency emphasises that it is establishing a more advanced system for verification and analysis. License holders were mainly expanding their existing backbone networks or increasing the capacities of their already existing directed links.

The Agency issued 399 CEPT amateur radio licenses for the requirements of amateur radio activities, as well as 399 decision on calculating the points and 399 decisions on fees for using radio frequencies (DFRF). The Agency issued 69 decisions for radio licenses for aircraft in 2024, and 183 for ships. In mobile radio systems the Agency received 114 new requests in 2024, and resolved 92 new ones, while 22 were transferred from the previous years, thereby resolving a total of 99 requests. It issued 251 decisions on awarding radio frequencies; for new mobile radio systems and for extending the validity of existing decisions and testing. In 2024 the Agency handled 294 cases related to radio broadcasting spectrum management, of which 195 were started at the party's request, 99 ex-officio, and issued 141 DARFs, 85 DAPs, and 77 collective DFRFs.

In the field of international coordination for analogue broadcasting the Agency resolved 39 cases and in digital broadcasting 18. It reviewed a total of 23 entries in the register with the International Telecommunications Union (ITU). In relation to coordination of mobile service it received 54 new cases, resolved 37, of which 9 were from 2024, and 12 carried over from past years. There were 10 new cases for satellite and fixed connections.

In 2024 the Agency continued with the activities for handling requests for the allocation of call signs for personal locator beacons (PLB). The database can provide help in handling information when a PLB holder requests help in the event of an accident.

As the Directive on radio equipment came into effect, it abolished the so-called one stop notification (OSN) system for notifying EU member states on technical parameters of radio equipment; however, the new notification system has yet to be established, and there are several reasons for this. One of the important ones is that the member states have not yet reached a consensus on the technical parameters that this information system would require from vendors, while questions about cybersecurity arise in the use of different radio equipment. The central system, in which manufacturers will be able to register the required information about radio equipment, accessible to individual authorities of the member states, is still in the development phase. The vendors are sending the technical data on their equipment to the Agency themselves, so that it may approve, limit or even prohibit the operation of radio

equipment in accordance with the valid Radio frequency utilization plan (NURF), if it fails to meet the technical conditions for operation. In order to ensure better supervision of using and also possibly prohibiting individual equipment that has not been standardised in Europe, the Agency obtained information at meetings with the Ministry of Economic Development and Technology and the Market Inspector of the Republic of Slovenia (TIRS), as well as through reports of working groups.

2.5 THE AGENCY'S INVOLVEMENT IN THE INSTITUTIONAL ENVIRONMENT

In the field of radio frequency spectrum management, the Agency cooperates with the Ministry of Digital Transformation and the Ministry of Foreign Affairs in the scope of the inter-ministerial working group for resolving radio frequency spectrum issues with Italy. The group aims focuses on resolving the issue of radio frequency spectrum interference by internationally uncoordinated Italian radio stations. Regarding this issue, the Agency is active at the level of the International Telecommunication Union (ITU) and in the EC in the Radio Spectrum Policy Group (RSPG).

Under the authorisation of the Ministry of Economy, Tourism and Sport, the Agency participated in the EC working groups, namely in the Telecommunications Conformity Assessment and Market Surveillance Committee (TCAM) and in the Expert Group on Radio Equipment (EG RE), where it participated in the updates of Decision 2006/771/EC and the harmonisation of technical conditions for the use of the radio frequency spectrum for short-range devices. The Agency submitted proposals for changes to the use of Class 1 radio equipment, which uses harmonised radio spectrum in the EU; these changes are being introduced at the national level through the General act on the radio frequency utilization plan (NURF), which is of exceptional importance for businesses that use these devices. The last major upgrade of the technical requirements for Class 1 radio equipment was carried out in 2020, followed by minor changes later. Due to rapid technological progress, a comprehensive revision and upgrade of the technical requirements is necessary, which was confirmed by the EG RE expert group in the scope of TCAM at the end of 2024. Within the scope of the authorisations of the Ministry of Economy, Tourism and Sport, the Agency actively participates in this process, making it possible for the Slovenian public to be informed about the progress in the field of radio equipment. In addition, it also gave its consent to the proposals for harmonised standards for the use of radio spectrum in the scope of its work at the Slovenian Institute for Standardisation (SIST).



2.6 NUMBERING SPACE

In 2024, the Agency's activities in the field of the numbering space were focused on the efficient management of all numbering elements in the Republic of Slovenia, with the aim of ensuring their effective structuring and utilisation, maintaining the official record of holders of decisions on the award of numbering elements in accordance with Article 264 of ZEKom-2, and providing access to the register on its website³. The Agency actively cooperated in the further development of the internet service portability and provider switching service.

An important task of the Agency is maintaining the official record of awarded numbering elements, electronic communication networks and services. The Agency processed applications for the acquisition or annulment of decisions on the award of numbering elements in a timely manner. In 2024, based on received applications, the Agency issued 7 decisions on awarding numbering elements and 2 decisions on the annulment, termination or partial termination of decisions.

ZEKom-2 also established the legal basis for the adoption of the General act on the numbering plan, in the scope of which the Agency also determined the criteria for assessing the ability to manage numbering elements and the risk of depletion of numbering elements. ZEKom-2 requires the Agency to publish on its website by 31 March each year an overview of the occupancy of individual numbering elements by type and intended use, including an analysis of the risk of depletion of individual numbering elements. In 2024, in accordance with paragraph 4 of Article 98 of ZEKom-2, the Agency prepared an Overview of assigned numbering elements from the national numbering plan of the Republic of Slovenia and an analysis of the risk of depletion of individual elements and published them on its website⁴ on 28 March 2024.

Among the Agency's regular tasks in the field of numbering space management is also the regulation of the method of number portability implementation and issuing of decisions on the assessment of payment for the use of numbering elements. 48 decisions for the payment for using numbering elements were issued ex officio in 2024.

In the scope of developing number portability and internet service provider switching, the Agency hosted several meetings between the central number portability database administrator and representatives from operators regarding the implementation of the General regulation on number portability and the replacement of the internet access service provider for numbers. In December the Agency hosted the first meeting with representatives of PXS, which succeeded Teletech d. o. o. as the administrator of the central database of ported numbers.

Additional activities in the field of the numbering space also included providing clarifications and instructions to stakeholders in the electronic communications market, especially foreign legal entities before entering the Slovenian market. In total, the Agency provided 18 clarifications to questions posed by citizens, operators and other interested public.

The Agency regularly participated in international working groups as a member of the international organisation CEPT/ECC. As part of the WG NaN (Working Group Numbering and Networks), effective policies for managing numbering plans are being developed, challenges within new services and applications are being addressed, and the sustainable use of numbering resources is being promoted. Participation in CEPT/ECC working groups helps the Agency understand business practices that also affect the domestic electronic communications market. Through questionnaires from individual regulators, experiences and examples of good practice are exchanged. As a member of the CEPT/ECC working groups, the Agency participates in the preparation of reports and, based on this, also recommendations, which are always part of a public consultation before publication in the CEPT/ECC documentation system⁵.

In October 2024, the Agency hosted a meeting of representatives of the WG NaN2 working group, which deals with specific topics related to number portability, trust in numbering and regulatory issues related to network technologies.

³ Registry <https://www.akos-rs.si/registri/seznam-registrov/stevilski-prostor>

⁴ Overview of allocated numbering elements from the national numbering plan of the Republic of Slovenia and an analysis of the risk of exhaustion of individual elements <https://www.akos-rs.si/telekomunikacije/raziscite/stevilski-prostor>




⁵ Documentation system <https://cept.org/ecc/deliverables>






VIII REGULATION





1 ELECTRONIC COMMUNICATIONS

1.1 ANNUAL GOALS AND THE STATE OF THE MARKET

TABLE 4: KEY OBJECTIVES IN THE ELECTRONIC COMMUNICATIONS

KEY OBJECTIVE: ENCOURAGING COMPETITION AND MARKET DEVELOPMENT					
Task/Project	Activities	Objectives	KPI	Result	Comment
The Electronic communications market regulation strategy for promoting regulative predictability.	Preparing a new Electronic communications market regulation strategy for the 2025–2027 period.	Ensuring regulative predictability and monitoring the performance of the activities laid down in the strategy.	Publish the final version of the Strategy by 31 December 2024.		The Strategy was published for public consultation on 24 January 2025. The Agency had to write the Strategy to set the new foundation because major changes to the market were announced.
Regulation of relevant market 2 (2020/2245/EU): Wholesale dedicated capacity	For relevant market 2 "Wholesale dedicated capacity": Preparing the analysis and holding a public consultation; Notifying the analysis with the EC; Issuing a regulatory decision.	Establish the state on this market, and to regulate it according to findings in order to ensure competitiveness on the market and to consequently ensure end users receive high-quality services at appropriate prices.	Publishing the final analysis for public consultation by 30 June 2024. Issuing a regulatory decision by 31 December 2024.		The Agency was ascertaining the state of the market; however, the analysis is not yet in public consultation. The Agency has attempted to involve stakeholders in the regulation to an even greater degree; however, so far it has not received any positive responses to the call for commitments from Telekom Slovenije, and consequently there has been a delay. The Agency now plans to publish the analysis to public consultation in 2025.
Regulation of relevant markets (1 and 3b)	Conducting the geographical analysis of the relevant market in accordance with the valid regulatory decision and, if necessary, adaptation of deregulated geographical areas).	Ascertain the situation on the aforementioned markets and, in accordance with the findings, adjust the regulated areas, in order to ensure competitiveness on the market and consequently make it possible for users to receive quality services at reasonable prices.	Preparing the analysis and possible adjustments of geographical areas by 31 December 2024.		The Agency published both geographical analyses and, after public consultation and notification to the EC in December 2024, issued regulatory decisions, with which it updated the list of settlements without price obligations on relevant market 1 and the list of deregulated settlements on relevant market 3b.

Regulation of relevant market 1 (2014/710/EU): "Wholesale call termination in individual public telephone networks provided at a fixed location and relevant market 2 (2014/710/EU): "Wholesale call termination in individual mobile networks"	Preparing the analysis and holding a public consultation; Notifying the analysis with the EC; Publishing the decision.	The objective of the analysis is to establish the state on this market, and to regulate it according to findings in order to ensure competitiveness on the market and to consequently ensure end users receive high-quality services at appropriate prices.	For relevant market 1 (2014/710/EU) preparing the analysis and publishing the decision by 31 December 2024.		The Agency prepared the analysis and put it into public consultation in early 2025. Issuing the decisions for deregulating the market is planned for the first half of 2025. The delay occurred due to unplanned activities, described in table 5.
			For relevant market 2 (2014/710/EU) publishing the final analysis for public consultation by 31 December 2024.		The Agency prepared the analysis, it will be completed and put into public consultation in 2025. The delay occurred due to unplanned activities, described in table 5.
Establishing the state of the market	The analysis of retail and wholesale prices of broadband connections for December 2023.	Monitoring the market for any potential new regulatory measures.	Obtaining the data from the operators and preparing a short analysis of trends by 30 November 2024		Publishing the analysis of products and services on the retail market for broadband access in December 2024.
					Publishing the abstract of products and services on the retail market for broadband access in October 2024.
	The survey on monthly household spending on electronic communications services, and the Analysis of the current demand for higher speeds of internet access and e-content.	Improving public awareness and establishing actual needs of the end users of electronic communications.	Concluding and publishing both surveys of end users by 31 December 2024.		Publication of both surveys in December 2024.

Support for stakeholders	Support in the implementation of EU directives and decisions (Roaming and other).	Providing operators support in the implementation of measures and holding a dialogue with operators.	Organising a workshop, holding meetings and preparing responses by 31 December 2024.		Workshop on the Gigabit Infrastructure Act (GIA), consultation on ensuring the coverage of households and territory with broadband and mobile networks.
KEY OBJECTIVE: PROTECTING USERS AND ENSURING THE PROVISION OF THE UNIVERSAL SERVICE					
Task/Project	Activities	Objectives	KPI	Result	Comment
Establishing the state of the market and, if necessary, determining the universal service provider and adapting the relevant general acts	Preparing the analysis of the state of the market in the scope of ensuring universal service, including an analysis of broadband access transfer speeds and pricing availability, and appointing the universal service provider.	The objective is to establish the state of the market, to prepare an analysis of transfer speeds, and to propose amendments to general acts for ensuring universal service (USO) and appoint the universal service provider.	Obtaining the data from operators and preparing the analysis of broadband access transfer speeds by 31 January 2024.		In April 2024, Agency published the analysis of the impact of the change in the universal service transfer rate and two related general acts for public consultation and responded to the received comments. A minor delay in the publication of the document occurred due to unplanned activities, described in table 5.
			Preparing the analysis of the state with regard to the need to appoint a universal service provider and issue decisions by 27 October 2024.		The Agency published the analysis of the state with regard the needs for appointing universal service providers in April 2024, the tenders in July, the decision for the directory access provider in November, and the decision for appointing the internet access provision provider in December 2024. A minor delay occurred due to unplanned activities, described in table 5.
			Preparing the analysis and, if necessary, prepare decisions imposing an obligation on USO providers to offer special prices for low-income or special needs consumers by 27 December 2024.		In December 2024, the Agency prepared an analysis and found that the conditions for offering special prices to low-income consumers were not met, and therefore no decisions were prepared.





KEY OBJECTIVE: OPTIMIZING INVESTMENTS IN INFRASTRUCTURE					
Task/Project	Activities	Objectives	KPI	Result	Comment
Encouraging optimization of investments in infrastructure	Optimisation, updating and maintenance of the Portal of infrastructure investments.	Ensuring optimum planning for construction and maintenance of communication and other public utility infrastructure of local communities and other important investors in PUI.	Maintenance and regular updates to the database of published investments in real time; time to publication shall not exceed 10 days.		The Agency will provide regular updates to the database of published investments in real time.
KEY OBJECTIVE: INCREASING EFFICIENCY AND REDUCING REGULATORY BURDENS					
Task/Project	Activities	Objectives	KPI	Result	Comment
Modernisation and automation of data collection for obligatory reporting	Security test of the software solution; data migration to the production environment; launching the new data collection system.	Setting up the data collection system to make reporting and data processing easier.	Security test of the software solution by 28 March 2024.		Final report on the security test of the software solution was concluded in July 2024.
			Data migration to the production environment by 31 March 2024.		Because of the large volume of data, the migration has not yet been fully completed, as each piece of data needs to be verified; the deadline for the completion of the migration is described in chapter 1.2.6 Modernisation and automation of data collection for obligatory reporting
			Launch of the new data collection system by 19 August 2024.		Details are described in the chapter 1.2.6 Modernisation and automation of data collection for obligatory reporting

TABLE 5: ADDITIONAL TASKS THAT HAD NOT BEEN PLANNED

Task	Goals of the task	Description (permanent activities or projects)	Comment
The Strategy of decommissioning the copper network	Accelerate the achievement of the objectives from the Plan of developing gigabit infrastructure by 2030.	Regulatory strategy to encourage copper switch-off in line with the Gigabit recommendation	The Agency started preparing the strategy in 2024 and published it for public consultation at the beginning of 2025.
Regulation of relevant markets (1 and 3b)	Changes/amendments to the measures.	Preparing a short analysis and preparing updates to the regulatory obligations on relevant markets with regard to the state of the market.	The Agency will publish the analysis for public consultation in 2025.
Recommendation to operators in case of unreasonable requirements for operator access	A detailed definition of unreasonable requirements for operator access.	Preparing the proposals and public discussion.	Because the issue is demanding, the Agency will complete the recommendation in 2025.
Candidacy for the BEREC Chairmanship	A bigger role of the Republic of Slovenia in preparing European legislation in the field of electronic communications.	Preparation of the candidacy and preparation of the draft BEREC operational programme for 2026.	The preparation of the BEREC operational programme will take place in 2025. The programme will be adopted at the 4th BEREC plenary meeting at the end of 2025.
Testing market interest for the construction of very high capacity networks	Complete the procedure of establishing market interest for the construction of very high capacity networks based on the received application by the legally proscribed deadline.	Preparing the draft call and the public announcement, and forwarding the obtained data to the authority that awards public funds, publishing the received data.	The Agency received two applications from the MEI and, in accordance with the Act, conducted two public calls, forwarded and published the collected data.



The Slovenian electronic communications market in 2024 was marked by significant dynamics, as reflected in both entries and exits from the official register of operators. The Agency recorded two new entries of companies with headquarters outside the Republic of Slovenia, which reflects greater interest of foreign operators in the Slovenian electronic communications market. The number of foreign operators active in the Slovenian market thus increased to 23, out of a total of 139 active operators in 2024.

In 2024, Agency received six applications for removal from the official register of operators. Three of these are directly related to the processes of takeovers and mergers with larger operators, which illustrates the increasing consolidation in the market.

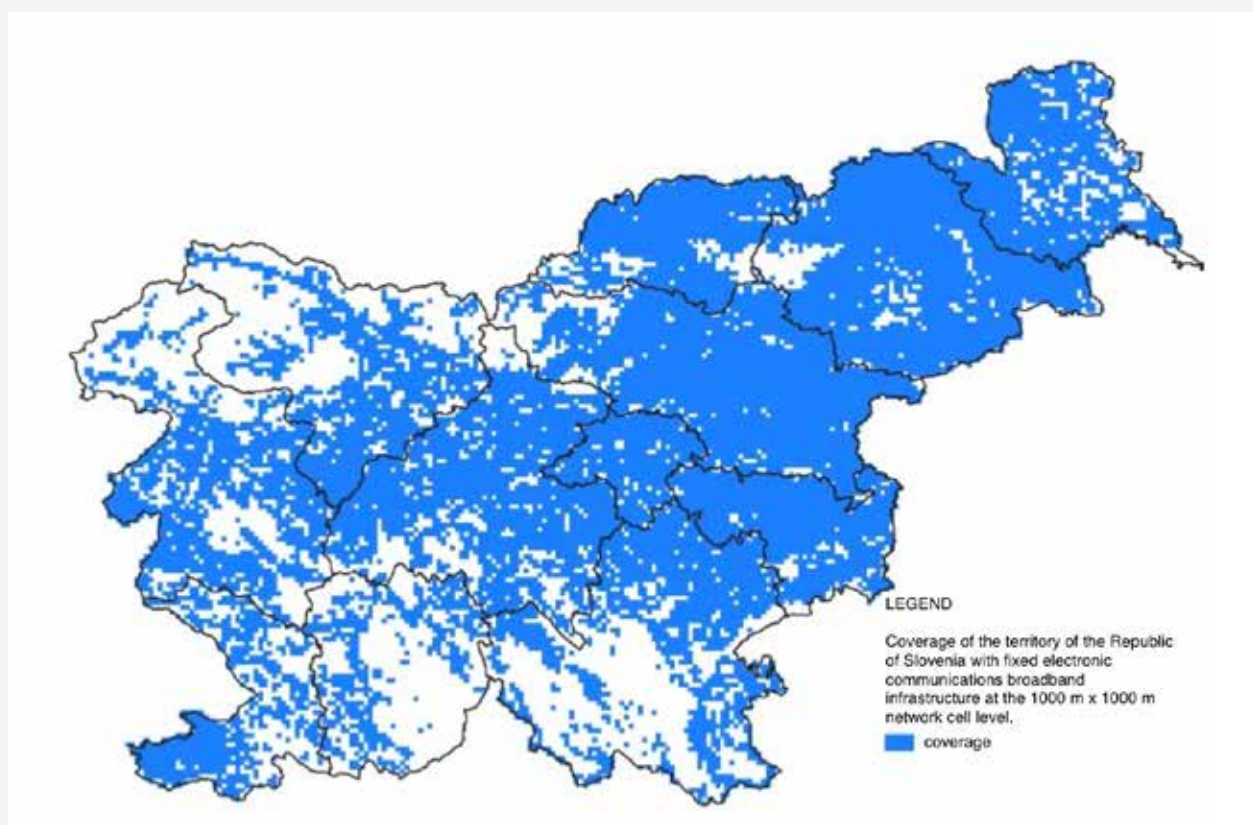
It is important to emphasise that the removal of operators does not necessarily mean failure in the market, but often reflects strategic business decisions. Merger and acquisition processes enable market participants to optimise business processes, reduce costs and strengthen their market presence.

TABLE 6: THE NUMBER OF OPERATORS/SERVICE PROVIDERS ENTERED INTO THE OFFICIAL REGISTRY BY SERVICE

Service	Number
Internet access	
Narrowband access	11
Broadband access	65
Cable access	21
Cable operators	32
Voice services in the public mobile network	
Operators	4
Service providers (together with VMNO)	25
Fixed public voice telephone services	
International public voice telephone service operators	27
Local public voice telephone service operators	29
Leased lines operators	54
Value added services providers	13

Fixed telephone service continues to lose market share in the electronic communications market in the Republic of Slovenia. Although 74.3 % of households still have fixed telephone connections, an increasing number have fixed telephone service as part of a subscription plan and do not use it. The decline in the use of fixed telephone services is reflected in the steep decrease in the volume of calls made from fixed networks, which in 2023 averaged just under 12 minutes per month per residential user, less than half of what it was two years ago and more than 13 times less compared to the volume of calls made from mobile networks, which have long been the dominant medium for voice communications. At the end of 2024, the share traditional telephone connections is only at 7.6 % of all telephone connections. Because users generally port their fixed voice connection when changing an operator, number porting plays an important role. After an increase in the number of fixed number portings to operators in the second half of 2023, a decrease in the number of portings of these numbers was observed again in 2024.

FIGURE 7: COVERAGE OF SLOVENIA WITH FIXED BROADBAND INFRASTRUCTURE



The figure shows the coverage of the territory of the Republic of Slovenia with fixed broadband infrastructure at the level of square kilometre cells. An individual area (1 km²) counts as having coverage with this infrastructure, if there is at least one appropriate network connection point in it.

The mobile telephone services market in the Republic of Slovenia is still predominantly controlled by four convergent operators, meaning that in addition to fixed services, they also offer mobile network services. These are Telekom Slovenije, A1 Slovenija, Telemach Slovenija and T-2. Telekom Slovenije still holds the largest market share in the mobile telephone services market, which in 2024 ranged between 35 % and 36 %. Telemach Slovenije's share reached a good 26 %, A1 Slovenija's share is slightly decreasing and stood at just under 25% at the end of 2024, while T-2's share was just under 7 %. Of the operators without a network of their own, the highest share is held by Hot Mobil with nearly 6 %.

Mobile operators with their own infrastructure continued with investments in their mobile networks in 2024. This is reflected in very high population coverage with LTE services and with continued development of 5G networks. Currently, however, no operator commercially offers the so-called Standalone 5G technology. They use the existing 4G core infrastructure and 5G radio network for their operations. The share of users who access LTE networks is gradually declining at the expense of users who also access 5G networks, with the latter group surpassing 36 % at the end of 2024. In 2021, Telekom Slovenije, Telemach Slovenija, and A1 Slovenija acquired 5G frequencies in the frequency band below 1 GHz, and they are required to cover 99 % of the population with 5G signal by the end of 2025. According to operator data, coverage already exceeded 80 % of the population at the beginning of 2024. Therefore, it is no longer limited only to major cities and the motorway network, but it does not yet exceed 20 % of the territory of the Republic of Slovenia for any operator. Telekom Slovenije and A1 Slovenija have already shut down the older 3G technology, while Telemach Slovenija and T-2 still offer it, although the share of users exclusively using this technology has already fallen below 1.4 %.

Slovenian mobile service users' follow global trends. Mobile subscription plans offered by mobile operators often provide users with unlimited voice calls and messaging, as well as growing data allowances, reaching up to seve-

ral hundred gigabytes (GB), and in some cases, even unlimited data. The number of mobile broadband access users continues to grow. The penetration of active mobile telephone services users also increased in 2024 and exceeded 130 %. In spite of the increasing penetration, there is a gradual decline in the quantity of calls made from mobile networks, amounting to just under 154 minutes per month per residential user in 2023, which is nearly 5 % less than a year ago. Conversely, the usage of mobile broadband internet access continues to increase, with data usage reaching over 15 GB per month per residential user in 2023, representing a growth of over 38 % compared to the previous year and over 82 % compared to 2021. The change in usage patterns of mobile telephony services is due to the increasing capacity of mobile networks and the wide range of over-the-top (OTT) services offered, such as social media and video platforms.

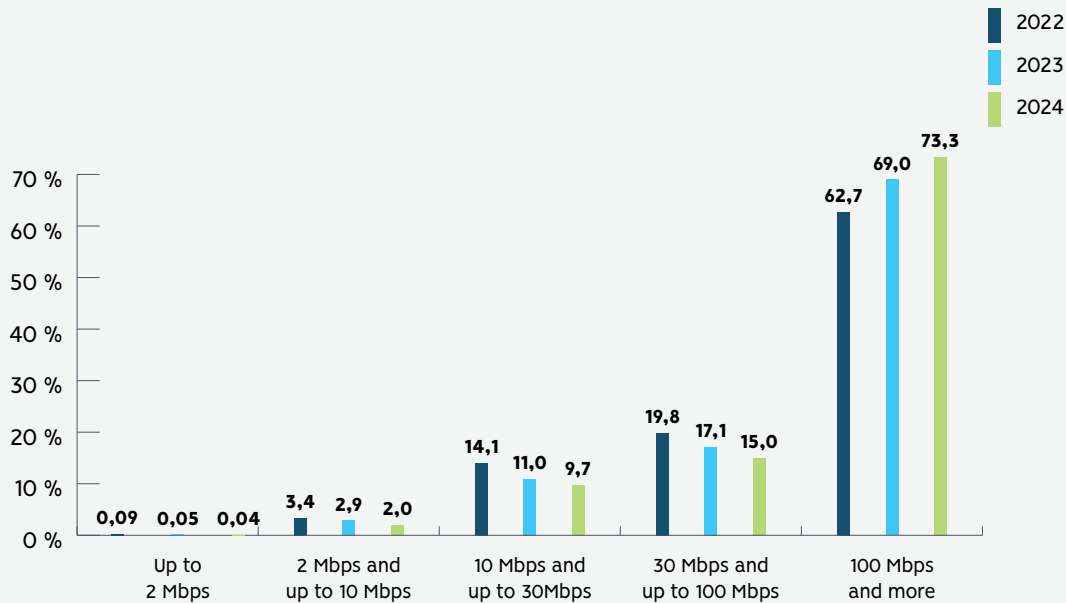
In 2023, the number of sent SMS messages also began to decline. Compared to 2022, the total number of sent SMS messages decreased by almost 10 %, which can also be attributed to the changed method of charging for wholesale termination of SMS messages. In 2022, operators transitioned from a »bill and keep« approach to mutual charging for SMS termination, aligning with the established practices of operators in the EU. The new charging method primarily affected businesses such as banks, insurance companies, tourism companies, and similar entities that send SMS messages en masse to their users or customers. As a result, many of these businesses have partially or fully transitioned to OTT platforms or have partnered with multiple operators to some extent, thereby avoiding additional costs for terminating bulk SMS messages in other networks.

The revised Roaming Regulation in public mobile communications networks in the EU, which entered into force in 2022, remains in force until 30 June 2032. It allows users to roam without additional charges for calls, SMS messages and internet use throughout the EU. Compared to 2024, regulated wholesale prices have decreased and in 2025 amount to EUR 1.30/GB for data roaming, EUR 0.019/min for calls and EUR 0.003/SMS for messages.

In 2024 the Agency helped improve Slovenia's standing in the European Union's Digital Decade Policy Programme 2030 across all areas under its authority: by the decisions it issues the Agency regulates the wholesale market by encouraging equal competitive conditions on the market, increases the utilisation of the already constructed networks, encourages the development of innovative, high-quality and accessible services, while also encouraging investment in the construction of high-transfer-speed broadband networks. Its work also makes it possible for end users to access high quality, innovative and accessibly priced services with higher speeds.

The prevalence of broadband access is one of the key indicators of the electronic communications market's development. In 2024, household coverage with fixed broadband access already amounts to 99%, with coverage of households with speeds of at least 100 Mbps reaching 89,8 %. Slovenian operators offer fixed broadband services via copper, cable, optical, fixed wireless, and mobile networks. The market share of connections with a subscribed data transfer speed of at least 100 Mbps continues to grow, having reached 71.90 % by the end of 2024. Meanwhile, the market shares of connections for fixed broadband internet access that provide lower access speeds have been declining for several years. These trends are the result of the increasing capacity of networks and the adaptation of the market offer. Operators no longer offer lower speeds, except where the network does not support speeds above 100 Mbit/s, while subscription plans with higher speeds have become affordable. Investments in the fixed network are almost entirely in the fibre optics network. Cable networks are only minimally upgraded and remain on the relatively old DOCSIS 3.0 standard, which also supports transmission speeds above 100 Mbit/s.

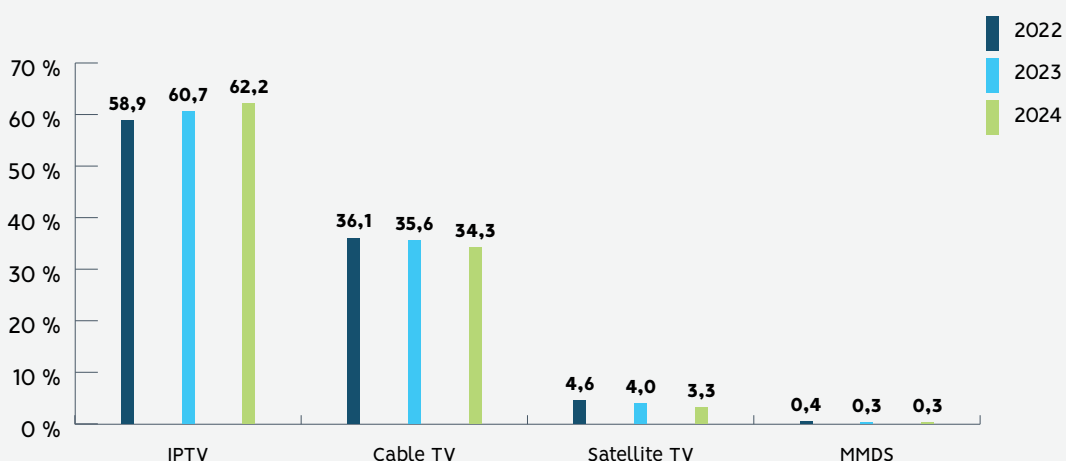
FIGURE 8: BROADBAND INTERNET ACCESS BY DATA TRANSFER SPEED



The key factors driving the increasing need for high bandwidth and low latency remain the expansion of OTT video content, remote work with virtual meetings, and cloud services. The continuous increase in demand for higher capacity connections enables further investments by operators in the network and progress towards the goals of the European Digital Decade Policy Programme 2030 and the Plan of developing gigabit infrastructure by 2030; nevertheless, additional incentives will be needed for full household coverage with gigabit infrastructure.

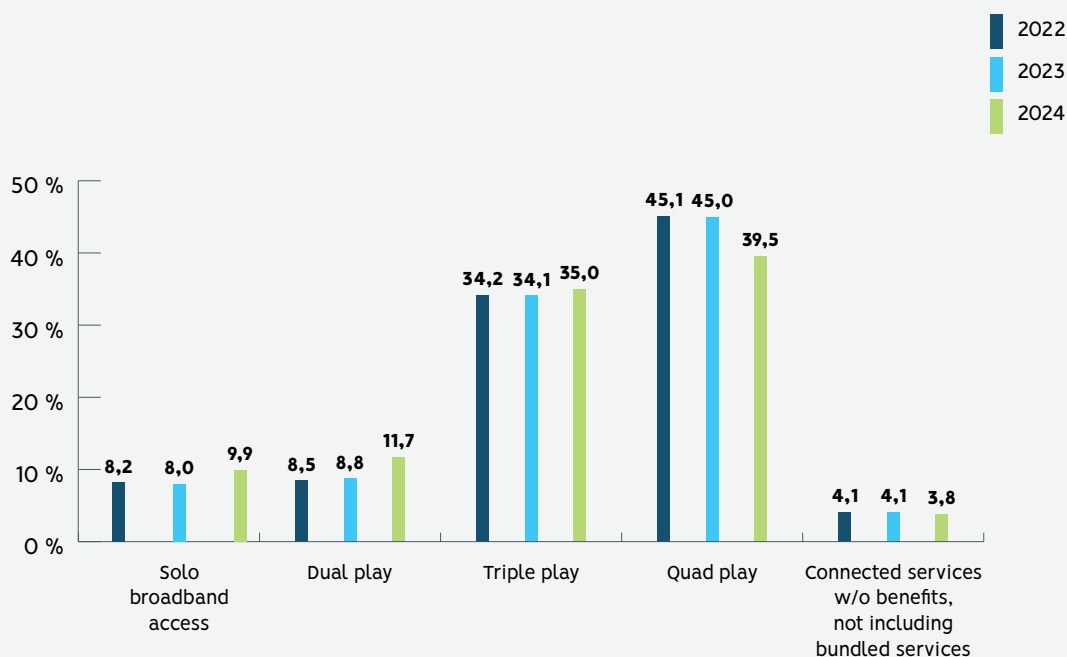
In 2024, the market share of IPTV connections increased slightly again by 0.9 percentage points compared to 2023 and amounted to 61.5 % at the end of 2024. Market shares of other technologies noted a decline again in 2024. The market share of cable TV dropped to 34.8 %, the market share of satellite TV to 3.6 %, while the market share of MMDS fell to 0.3 %. These changes in market shares are a result of network upgrades, which are generally based on the construction of fibre-optic loops to end-users.

FIGURE 9: SHARES OF FIXED TELEVISION CONNECTIONS BY TECHNOLOGY



For the past few years the most popular offers combined different types of services: mobile services, internet access, TV, and fixed telephone services. These services are bundled in a way to satisfy the needs of different users while also growing customer loyalty. The providers also include different extra services, such as video on demand, cloud storage, security plans and similar. In 2024, an increase was observed in the number of dual-play subscription plans, which include two different services, and triple-play subscription plans, which contain three different services, as well as the number of connections with stand-alone broadband access, while the number of connections with quad-play subscription plans (which, in addition to the triple subscription plan offer, also includes at least one mobile component, therefore representing a fixed-mobile convergence offer) decreased.

FIGURE 10: CONVERGENT SERVICES



In 2024, the carrier broadband access market continued to exhibit the same trends as in previous years. Carrier access allows operators to provide broadband services to end users in areas where they do not have their own networks. This provides operators with access to end users through regulated access over the copper or fibre optic network of Telekom Slovenije, where users can opt for physical or virtual unbundled local access (VULA), or central bitstream access. Over the past few years access has been growing to open broadband networks that were built through public-private partnerships, especially in areas where operators did not show any commercial interest for construction. Construction of such networks will continue in the future. In August 2024, a public call for co-financing the construction of very high capacity fixed broadband networks or the upgrade of existing fixed networks (GOŠO6) was published. This is partly co-financed by the EU from the funds of the Recovery and Resilience Facility. Special attention is paid to sparsely populated areas with fewer than 150 inhabitants per square kilometre and geographically challenging areas throughout the Republic of Slovenia.

On the carrier market for copper network connections, the trend of decline in connections over unbundled local access and central access slightly reversed upwards in 2024, while the number of connections via bitstream still decreased. In the wholesale market on the fibre-optic network, the trend of rapid growth in the number of connections via local access (physical and virtual unbundling) continued, and during 2023 these connections had already surpassed the number of central access connections, which is still declining. The reasons for switching from the copper to the fibre optics are mainly in the increased construction of fibre optic connections of the operator with significant market power. The majority of the fibre optics network of the operator with significant market power was constructed using the P2MP (point-to-multi-point) method, provides operators with the option of virtual unbundled local access (VULA) based on imposed regulatory obligations that were imposed on Telekom Slovenije on the relevant market 3a "Wholesale local access at a fixed location", with a regulatory decision issued the end of

⁶ <https://www.gov.si/zbirke/projekti-in-programi/nacrt-za-okrevanje-in-odpornost/o-nacrtu-za-okrevanje-in-odpornost/>

2017, and extended with the latest decision from 2022, while settlements where a sufficient level of competition has been achieved, are deregulated. The Agency adds new settlements to the list of settlements without price obligations in market 1 and to the list of deregulated settlements in market 3b every year. The gradual deregulation of the relevant market 3b »Wholesale central access at a fixed location for mass market products« and measures imposed on Telekom Slovenije in the relevant market 1 have contributed to the gradual ascent of operators up the investment ladder (moving from central to local access) and strengthening of infrastructure competition.

1.2 ACTIVITIES FOR ACHIEVING THE OBJECTIVES

1.2.1 REGULATION OF RELEVANT MARKETS

The Agency set several important goals in electronic communications regulation with the key objective of encouraging competition and market development. Among other things, to continue with the analysis of the relevant market 2: Wholesale dedicated capacity, which will be subject to public consultation in the first half of 2025. With the aim of adapting regulatory measures as closely as possible to the real conditions and challenges in the electronic communications market, the Agency used a new approach established in the EU and proposed the voluntary acceptance of commitments. This has not yet been accepted by the operator with significant market power, and therefore the Agency is continuing its work following the established procedure.

The Agency also conducted geographic analyses of competition in the relevant market 1, »Wholesale local access at a fixed location,« and market 3b, »Wholesale central access at a fixed location for mass market products«, with the aim of continuing to gradually deregulate the markets. For both geographical analyses, the Agency conducted public consultations with updated lists of settlements without pricing obligations or completely deregulated settlements, notified them with the European Commission, and concluded the task with issuing additional decisions to Telekom Slovenije.

In 2024, the Agency also began preparing an analysis of the relevant market 1/2014 "Wholesale call termination on individual public telephone networks provided at a fixed location", where the Agency found that the market no longer meets the three-criteria test. Therefore, after the public consultation is completed in the first half of 2025, the Agency will remove the regulation of this market.

In 2024 the Agency also undertook that in line with regulatory decision it provides support in the implementation of imposed measures, monitored the execution of imposed non-pricing and pricing obligations on both markets. The Agency also monitored technology trends on the market and their effect on regulation, which also includes the phase out of Telekom Slovenije's copper network and its replacement with fibre optics, which is important in the process of switching to high-speed networks.

1.2.1.1 MARKET 1(2020/2245/EU) AND MARKET 3B (2014/710/EU)

The Agency conducted a geographic analysis of competition in the relevant market 1, »Wholesale local access at a fixed location,« and market 3b, »Wholesale central access at a fixed location for mass market products« in 2024. For both relevant markets, in 2022, the Agency designated Telekom Slovenije as the operator with significant market power and imposed proportional obligations on it through regulatory decisions. For relevant market 1, the geographic scope was defined as national, with pricing obligations lifted in some settlements where conditions for competitive operation by operators were established. Regarding relevant market 3b, two sub-markets were identified: one with settlements with competitive conditions, where deregulation was applied, and another with settlements that lack competition and require continued regulation. The Agency committed to conduct a geographic analysis annually to further the gradual deregulation of the market.

To ensure regulatory predictability, the Agency conducted the geographical analysis of both markets in the same manner and using the same criteria as the analyses of the relevant markets on which both issued regulatory decisions are based. Based on the geographical analyses, the Agency found that there had been changes in competitive conditions in both markets, and consequently, after a preliminary public consultation and notification of the geographical analyses to the European Commission, the Agency issued supplementary decisions to Telekom Slovenije. The updated list of settlements without price regulation in the relevant market 1 now includes 36 settlements with

a total of 148,445 households. The list for the relevant market 3b, where conditions for deregulation have been met, includes a total of 976 deregulated settlements with 343,811 households.

The Agency may change priorities and objectives if this is necessary to ensure an appropriate state of the market. Therefore, in addition to or instead of planned tasks, the Agency may carry out others that were not planned. In 2024, the Agency began preparing an analysis for the purposes of updating regulatory obligations in the relevant markets 1 and 3b. Based on the new guidelines for the decommissioning of the copper network, presented in the Gigabit Recommendation, the Agency decided to carry out a detailed analysis of the state of the copper network, the possibilities for migrating end-users from the copper to the fibre optics network, and the gradual decommissioning of the copper network in the Republic of Slovenia. Based on the results of this analysis, proposals for changes to regulatory measures in the wholesale local access market and in the wholesale central access market will also be presented. The aim of the changes is to create conditions that will enable successful adherence to European guidelines and the achievement of digital transformation goals in the Republic of Slovenia. The Agency will submit this analysis for public consultation in 2025. As a first document, the Agency prepared the Strategy of regulatory measures to accelerate copper decommissioning, which it published for public consultation at the beginning of 2025.

1.2.1.2 MARKET 4 (2014/710/EU) AND MARKET 2 (2014/710/EU)

Relevant market 4 “Wholesale high-quality access at a fixed location” was renamed in the Recommendation on relevant markets from 2020 into relevant market 2 “Wholesale dedicated capacity”. The Agency has issued the currently valid decision on the relevant market 4 in 2019, which means that based on the provisions of ZEKom-2 it will perform the next analysis of this market in 2025; however, it requested the EC the deadline be extended to 30 September 2025. In 2024, the Agency collected data in the market; however, as the quality of the submitted data was poor, this prolonged the Agency's work in this area. With the aim of adapting regulatory measures as closely as possible to the real conditions and challenges in the electronic communications market, the Agency used a new approach established elsewhere in the EU and proposed the voluntary acceptance of commitments. This has not yet been accepted by the operator with significant market power, and therefore the Agency is continuing its work following the established procedure. In the retail leased lines market, Ethernet leased lines are predominant, while the wholesale market is characterised by demand for unlit optical fibres, which allow parties seeking access greater independence in shaping offers for retail customers. Consequently, the Agency plans to publish the analysis for public consultation in the first half of 2025, and the decision will be published subsequently.

1.2.1.3 ANALYSIS OF RETAIL AND WHOLESALE PRICES OF BROADBAND CONNECTIONS

In 2024 the Agency systematically monitored and analysed the activities on the market of broadband connections both from the perspective of the state of the competition in the retail market, and the movements of retail prices, as well as wholesale pricing and broadband access products. It placed special attention on the analysis of competitive conditions on both observed markets, and the obtained data serve as a key foundation for preparing new proposals for regulatory obligations, and for monitoring market development and verifying the accuracy of the data on the infrastructure of electronic communications. In order to obtain a comprehensive insight into the state of individual geographic market segments, the Agency once again conducted an analysis of retail broadband access services and an analysis of wholesale prices and products of broadband access throughout the territory of the Republic of Slovenia. In order to perform the analyses it collecting data from all the active operators on the market, and identified the most important retail and wholesale products provided by operators in individual geographic areas. The Agency published the abstracts of the analyses.

With the support of an external provider it conducted a periodic survey on monthly household expenditures for electronic communications services, and prepared an analysis of the current demand for higher speeds of internet access and e-content. The survey was based on data for October 2024, and the Agency monitored market trends, analysed service usage and obtained insight into the needs of end users of electronic communications. Both surveys and the analysis and key findings were published on the Agency's website in December 2024.



The Agency
will strive
to ensure
proactive,
efficient

and future-oriented regulation
that promotes the development
of communication networks and
services for the benefit of the
residents and businesses

1.2.2 THE ELECTRONIC COMMUNICATIONS MARKET REGULATION STRATEGY FOR PROMOTING REGULATIVE PREDICTABILITY

In 2024, based on the analyses of the implementation of the Strategy for promoting regulatory predictability in the electronic communications market for the period 2022–2024, the Agency began preparing a new Strategy for the period 2025–2027 and published it at the beginning of 2025. The Agency defined three strategic goals and proposed activities for their achievement, namely (i) the development of effective competition, (ii) the co-creation of European and national policy, and (iii) the protection of end-users. The Agency will strive to ensure proactive, efficient and future-oriented regulation that promotes the development of communication networks and services for the benefit of the residents and businesses of the Republic of Slovenia and encourages competition and innovation in the market.

1.2.3 THE STRATEGY OF DECOMMISSIONING THE COPPER NETWORK

In 2024, the Agency completed most of the work on preparing of the Strategy of regulatory measures to accelerate copper decommissioning. Although the number of connections on the copper network is rapidly declining, the network is still in use, which means poorer services for remaining users and additional costs for Telekom Slovenije. The Agency published the draft Strategy at the beginning of 2025 on its website. Based on this Strategy and the new Gigabit Recommendation, which envisages ways to regulate and promote the decommissioning of the copper network, a proposal for changes to regulatory rulings will be prepared, which will contain provisions to accelerate the decommissioning of the copper network, as described in the chapter on the regulation of markets 1 and 3b.

1.2.4 INTERNATIONAL ROAMING

The revised Roaming Regulation in public mobile communications networks in the EU, which entered into force in 2022, remains in force until 30 June 2032. It allows users to roam without additional charges for calls, SMS messages and internet use throughout the EU. Compared to 2024, regulated wholesale prices have decreased and in 2025 amount to EUR 1.30/GB for data roaming, EUR 0.019/min for calls and EUR 0.003/SMS for messages. In addition to the same prices as at home, the Regulation also ensures the same quality of internet abroad for mobile telephone services users while roaming.

In accordance with the Regulation on roaming on public mobile telephone networks within the Community, operators report to the Agency on the roaming of mobile users, which regulatory authorities, after successful validation, transmit to the Body of European Regulators for Electronic Communications (BEREC). The data must be submitted annually. The Agency provided support to operators in reporting data and, where necessary, professional assistance.

Also in 2024, based on two received applications and in accordance with the applicable EU regulations, the Agency issued two decisions to Hot mobil d.o.o. With the first decision, the Agency approved surcharges on roaming services in public mobile communications networks provided in the EU for a period of 12 months from 11 April 2024, specifically for five requested tariffs/subscription plans. With the second decision, the Agency approved surcharges for one additional tariff/subscription plan and set the period of validity from the start of the tariff's sales on the market until the expiry of the 12-month period from the first ruling (11 April 2025).

1.2.5 DATA COLLECTION AND REPORTING – THE EANALITIK PORTAL

In line with the applicable legislative framework, all natural and legal persons who provide electronic communication networks or perform electronic communication services, accompanying capacities or accompanying services are obligated to report the data on the development of the electronic communications market to the Agency. Operators submit the required data through electronic questionnaires on a dedicated portal for collecting the data and information.

In addition, the Agency also obtains data using supplementary questionnaires, which it conducts in accordance with market needs and legislation. The Agency submits the collected data to the European Commission, other regulatory bodies, national bodies and international organizations with authority in electronic communications.

With the aim of increasing transparency and data accessibility, the Agency has for several years systematically published information on the electronic communications market on the eAnalitik web portal, where data for the last ten

years is available. The portal provides a visual display of data, and is accessed by both the professional and wider public, as well as other stakeholders. The Agency and the operators actively strive to ensure high-quality and accurate data.

1.2.6 MODERNISATION AND AUTOMATION OF DATA COLLECTION FOR OBLIGATORY REPORTING

In 2024 the Agency continued with the project for modernising the system for data collection from entities with reporting obligation according to the offer for the development, implementation and maintenance of the data collection information system.

As the results of the partial migration of actual test data in the test environment showed certain irregularities that needed to be rectified and the migration model adjusted accordingly, and as additional activities were required to achieve the implementation of end-user requirements, there was a delay in the implementation of certain planned project activities in 2024 as well. The project work had to be adjusted and focused the earliest possible realisation of partial results – i.e. the launch of individual modules of the system in 2024 – to achieve the final goal, which is the launch of the new ePodatki information system in the production environment.

In July 2024, the final security review of the new software solution was successfully completed and certain corrective measures were implemented to enhance information security. Following consultation with operator representatives and end-user training on the use of operator notifications and event reports module, the module was launched into the production environment with a defined transition period of use until 31 December 2024. After testing data entry with operator representatives and end-user training on the use of the operator questionnaires module in December 2024, the production data capture will be carried out at the beginning of 2025, for the previous reporting period. The Agency also planned a transitional introductory period of use for the operator questionnaires module. User requirements and data migration that were not a prerequisite for launching the system in the production environment will be completed by 31 May 2025.

1.2.7 ENSURING UNIVERSAL SERVICE AND MONITORING ITS PROVISION

In 2024 the Agency monitored the provision of the universal service. With the General act on transfer speed suitable for functioning internet access the downlink transfer speed of 10 Mbps and uplink speed of 1 Mbps were set, and the data allowances for a satellite connection stands at 75 GB per month, while it is unlimited for all other technologies.

At the beginning of 2024, the Agency prepared an Analysis of the impact of changes in the broadband internet access transmission speed within the universal service and a proposal for amendments to two related general acts, namely the General act on changes and amendments to the General act on the quality of universal service and the General act on amendments to the General act on the transmission speed suitable for broadband internet access. The Agency proposed a higher transmission speed. Taking into account operators' comments, the Agency postponed the adoption of the proposed general acts at least until the expiry of the deadline by which mobile communications operators must ensure 99 % population coverage sufficient for transmission speeds with a user experience of at least 30 Mbps downlink and 3 Mbps uplink, which is set at 31 December 2025. The Agency also informed the interested public that it would re-examine the market situation and, if necessary, adjust the transmission speed, presumably in 2026.

In 2024, the 5-year period for which the providers of both universal services were determined by rulings expired. The Agency prepared the Analysis of the universal service of connection to the public communications network at a fixed location and access to voice communications service and broadband internet and the Analysis of universal services of providing and accessing the universal directory and subscriber information service in April 2024 and, after a public consultation, published a public call for the selection of providers for both services. The procedure for appointing providers was completed at the end of 2024. For the universal services of connection to the public communications network at a fixed location, through which access to voice communications service and adequate broadband internet access with a transmission speed as defined in the currently valid general act on transmission speed is provided, Telekom Slovenije was appointed as the provider for the period from 13 December 2024 to 1 July 2026. For the universal services of providing and accessing the universal directory and the universal subscriber information service (universal directory service), TSmedia was appointed as the provider for the period from 3 December 2024 to 3 December 2029. Also at the end of the year, the Agency again supplemented the proposal of the General act on amendments to the

General act on the quality of universal service, in which it increased the minimum monthly volume of data transmitted to the end user, which must be ensured by the provider of broadband internet access via satellite, from at least 75 gigabytes (GB) to 150 GB. The amendment will enter into force on 1 January 2026.

The Agency also prepared an analysis on access to services for low-income or special needs consumers and found that the criteria by which the Agency decides on price options or subscription plans for low-income or special needs consumers are not met.

The Agency also performed a series of activities aimed at raising end user awareness on the options for broadband access, informing them of the options for connecting to broadband networks, and access to the universal service. The Agency also provided responses to some questions related to the universal service that it received from end users.

In 2024, Telekom Slovenije applied for compensation for the net costs of providing the universal service for 2023, but did not adequately substantiate and demonstrate the claim in the initial application. The Agency must verify the accounting records and information and the method of calculating the net costs, including intangible benefits, which are taken into account in the calculation of the net costs of providing the universal service, in accordance with the General act on the method of calculating the net costs of universal service. The Agency repeatedly called on Telekom Slovenije to provide clarification, held an oral hearing, sent additional questions and a request for the submission of evidence. The situation is therefore not yet fully clarified, and a decision on the application could not yet be made.

1.2.8 PREPARING NEW GENERAL ACTS BASED ON ZEKOM-2

In 2024, the Agency prepared amendments to three executive acts, namely the General act amending the General act on itemised invoices, which was supplemented to make it easier for end users to verify their service provider, the General act amending the General act on the quality of universal service, and the General act amending the General act on the quality of emergency communications services.

1.2.9 ENCOURAGING OPTIMIZATION OF INVESTMENTS IN INFRASTRUCTURE – AKOS GEOPORTAL

AKOS Geoportal is the central online portal for accessing and viewing spatial data that the Agency uses in its day to day work. The main objective of AKOS Geoportal is to lower the costs of construction of very-high-capacity networks, encourage shared use and shared construction. The goal of such open data policy is related to a higher level of transparency of operations and a proactive publication and exchange of spatial information. It serves both the general and the professional public with a transparent insight into the data on electronic communications and other infrastructure. AKOS Geoportal is also useful for end users and other organisations that need to verify coverage with a certain infrastructure.

In 2024, the Agency updated the existing content and added new features to the AKOS Geoportal. These allow users to express their interest in the construction or upgrade of electronic communications networks where they do not yet exist, or to report errors in network data, thereby contributing to the gradual improvement of the records. Layers from the postal network area have been added, and the digital orthophoto (DOF) bases, which are a key component of the hybrid base, have also been updated. The update carried out in 2024 supports daily data updates, providing users with insight into the current status of the records. In 2024, the Agency also introduced a new method of data submission for point-to-point fixed links.

The 2024 updates to the AKOS Geoportal place it alongside pioneers in this type of data presentation, while also contributing to the empowerment of end-users and greater efficiency of investments in electronic communications networks in the Republic of Slovenia. To ensure that this relevant portal is even better known by interested stakeholders, the Agency also organised a workshop showcasing the usability of the AKOS Geoportal.

1.2.10 RECOMMENDATION ON PROPER ACTIONS TO BE TAKEN BY OPERATORS WITH UNFOUNDED OR UNREASONABLE REQUIREMENTS FOR OPERATOR ACCESS

With the aim of ensuring greater transparency and because of the changed market conditions the Agency began in the second half of 2023 to prepare a new Recommendation on proper actions to be taken by operators with unfounded or unreasonable requirements for operator access. It calls for additional safeguards into the revisions to prevent

potential abuse, such as delaying payments by operators, while also ensuring additional procedural steps and improving notifications of end-users. The Agency has updated the text with ZEKom-2, and made other improvements to enhance clarity and refine definitions. Due to the complexity of the task and highly conflicting interests, the task was carried out throughout 2024, as three rounds of public consultations were necessary. In addition, there was a complication in the notification of the measure to the EC. The operator who must provide access, either based on SMP status or based on an Agency ruling issued in accordance with the fourth paragraph of Article 130 of ZEKom-2, will be able to implement the measures more efficiently and quickly following this recommendation. This is necessary to minimise business damage to operators. The recommendation stipulates the proportionality of measures with regard to the extent of breaches of inter-operator agreements, thereby introducing more gradual action than has been the case so far. At the same time, as part of the recommendation, the Agency has also significantly improved the position of end users, who must not be affected by problems with the implementation of carrier agreements, or the damage to end users must be minimal.

1.2.11 INQUIRY OF MARKET INTEREST FOR THE CONSTRUCTION OF VERY HIGH CAPACITY NETWORKS

In accordance with Article 19 of ZEKom-2, upon receipt of an application from the body awarding public funds, the Agency must prepare a public call for expression of market interest in the construction of very high capacity networks. This is essential before public funds are used for the construction of very high capacity networks in unserved areas or areas without adequate broadband infrastructure. In 2024, the Agency received two such applications from the relevant ministry.

The first Public call to interested investors in electronic communication networks to demonstrate market interest for the construction of very high capacity networks or the upgrade or expansion of existing networks with a minimum downlink transmission speed of 100 Mbps throughout the territory of the Republic of Slovenia in the next three years was published in May 2024. Market interest was tested for the entire territory of the Republic of Slovenia, excluding all households with (a) already had adequate next-generation broadband coverage, (b) where construction co-financed by public funds is ongoing and public funds have already been spent, and (c) where market interest for the construction of next generation broadband networks was detected in 2021 and 2023.

The second call was also published by the Agency in May, namely the Public call for the expression of market interest in the affected and simultaneously unserved areas following the floods in 2023, for a period of three years for the construction or expansion of 4G or 5G networks. It related to coverage with a mobile network that will enable a speed of at least 100 Mbps downlink, specifically in the affected areas following the floods in 2023 and locations within these areas that are not yet adequately covered. In accordance with legal obligations, the Agency also published the expressions of market interest.

1.2.12 THE AGENCY'S INVOLVEMENT IN THE INSTITUTIONAL ENVIRONMENT

The Agency was very active at the international level in 2024, both in relation to the EC, European institutions and associations, and also with other regulatory authorities, thereby fully meeting the set objectives for 2024, which is explained in more detail in Chapter XIII The Agency's International Activities. In this scope the Agency exchanged opinions, best practices, coordinated and exchanged required information, and helped create the regulatory policies and approaches at the European level. It continued with close cooperation with Body of European Regulators of Electronic Communications (BEREC), where one of its tasks was to continue heading the working group on cybersecurity in mobile 5G networks. As a full-fledged member of the BEREC regulator committee it participated in 12 expert working groups which are working on 48 projects, and another 3 in the scope of the BEREC Office. The Agency remains an active member of the Independent Regulators Group (IRG), the international organization European Conference of Postal and Telecommunications Administrations (CPPT/EEC), and collaborates successfully with the European Union Agency for Cybersecurity (ENISA).

The Agency regularly cooperates with various national and international institutions that contact it regarding the preparation of reports and the acquisition of data it possesses. Among the key stakeholders who rely on the Agency's data and analyses in their work are the Statistical Office of the Republic of Slovenia, the Bank of Slovenia, the Slovenian Competition Protection Agency, ministries, the EC, and numerous international regulatory bodies and institutions competent for the field of electronic communications.

For many years, the Agency has been collecting data on the international roaming of mobile users for the needs of the Bank of Slovenia, and in recent years also for the Statistical Office of the Republic of Slovenia. The Agency aggregates, processes, anonymises and then forwards the data obtained from operators to both institutions. This data serves as a basis for the preparation of various analyses, including for the purposes of the balance of payments and analyses of tourism flows, which are crucial for monitoring economic indicators and shaping strategic guidelines.

The Agency's representatives regularly provided expert support to the Ministry for Digital Transformation in several areas:

- in the preparation of tenders for subsidising the construction of base station towers within the framework of measures to eliminate the consequences of floods;
- in the preparation of calls for tenders for the construction of open broadband networks (GOŠO);
- in promoting the possibilities offered by the provision of universal service for access to the broadband network in areas where there is no commercial interest in providing such services.

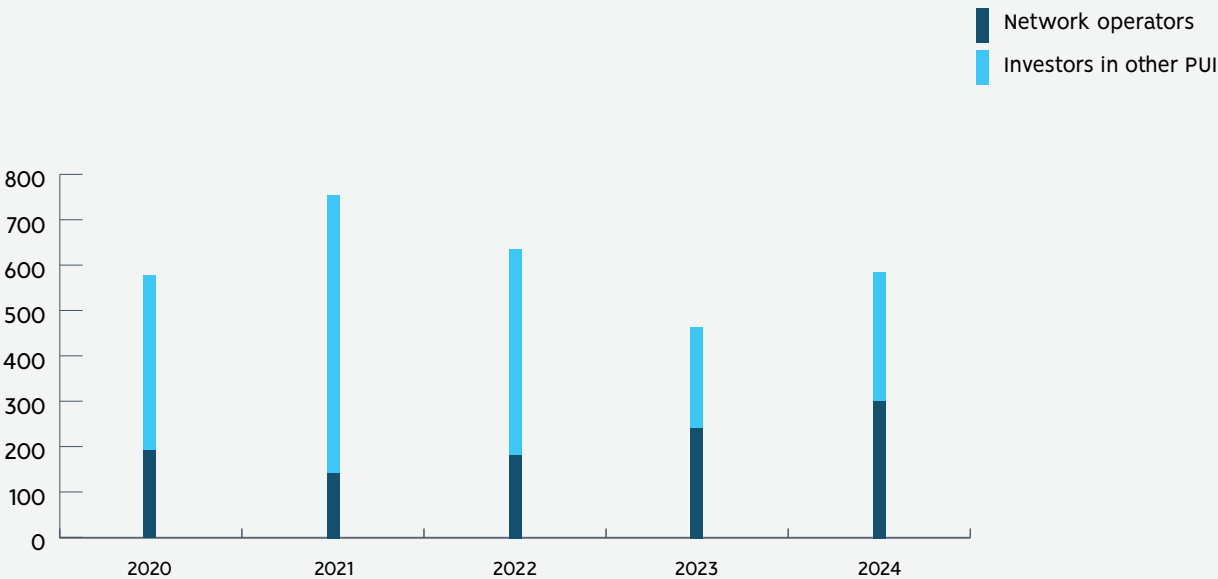
With the aim of presenting the universal service, the Agency has, in cooperation with the Ministry for Digital Transformation, organised a workshop for representatives of local communities. It also participated in the workshop of the ministry, which was dedicated to the presentation of the content of the European Commission's White Paper. Another close collaboration with ministry was in the implementing part of the development of the infrastructure of electronic communications. The Agency provided support in the preparation of the Connectivity Report. The cooperation with the MDP and the Surveying and Mapping Authority related to listing and establishing the database of available infrastructure in the collected register of public utility infrastructure.

1.2.13 MONITORING INFRASTRUCTURE INVESTMENTS

The Agency set as one of the key objectives in optimising investment outlays in infrastructure in 2024 to continue the optimisation, updating and maintenance of the Infrastructure Investment Portal, which operated smoothly and ensured the real-time updating of the investment announcements database and the automatic display of data also on the AKOS Geoportal.

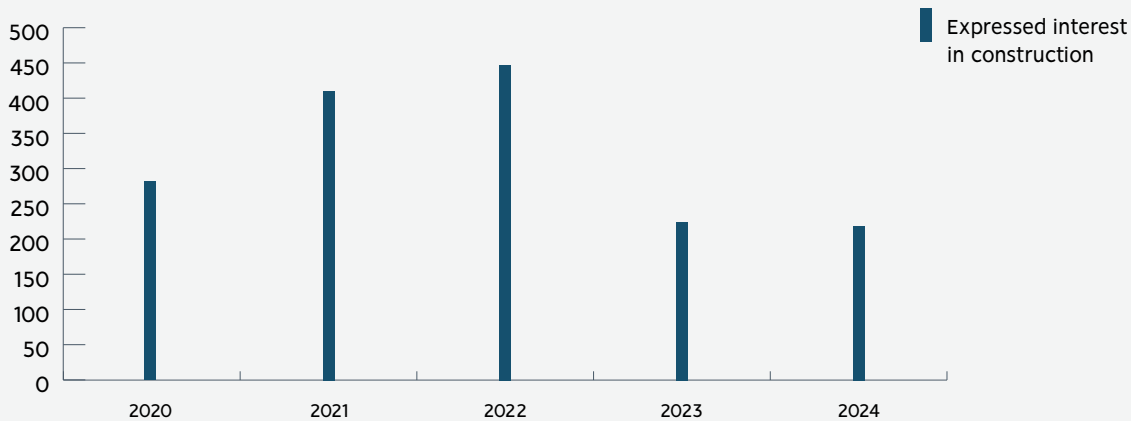
In 2024, the number of construction announcements grew again, by 26% compared to the previous year. For the third year in a row, the Agency has observed a trend of an increasing share of network operators' construction announcements. Since 2021, the number of these announcements has been increasing by almost 28 % per year on average.

FIGURE 11: NUMBER OF CONSTRUCTION PROJECT NOTIFICATIONS ON AKOS' WEBSITE



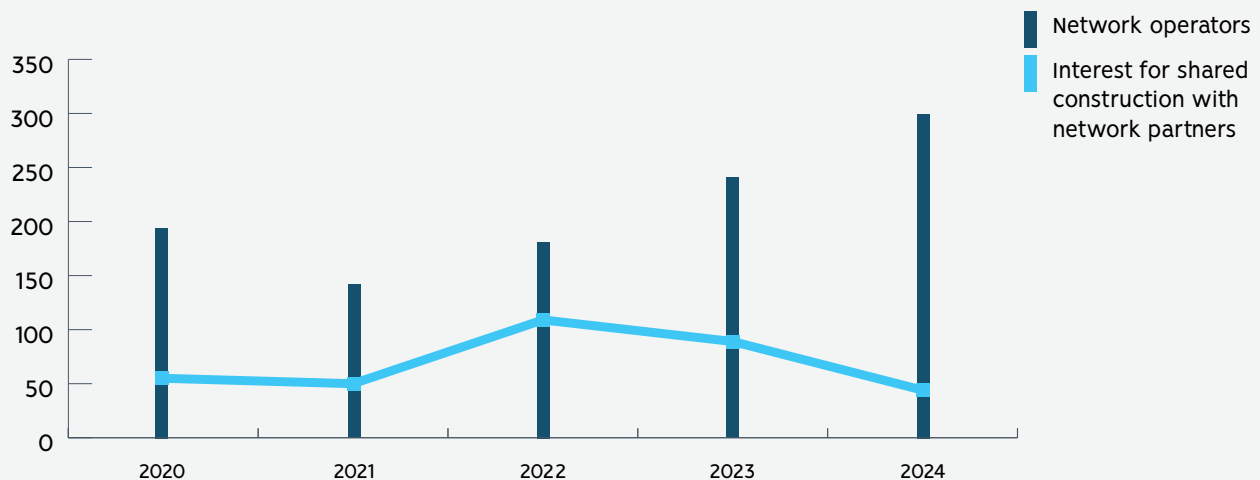
The demonstrated interest for shared construction in 2024 was at about the same level as the year before.

FIGURE 12: EXPRESSED INTEREST IN SHARED CONSTRUCTION



Despite the increase in the share of planned constructions by network operators, the Agency observed a decrease in the number of expressions of interest for joint construction with them in 2024, as in the two preceding years. This decrease is the result of several factors; on the one hand, the most investment-attractive areas with denser populations, which enable the economically sustainable existence of multiple networks, are already covered, open networks are being built where wholesale access is ensured to all operators, and a stagnation of investments by two significant operators can also be observed, and therefore, from this perspective, there is less interest in joint constructions.

FIGURE 13: PLANNED CONSTRUCTION OF TELECOMMUNICATIONS INFRASTRUCTURE AND EXPRESSED INTEREST IN SHARED CONSTRUCTION



In the first half of 2024, the Agency held two sets of workshops in municipalities. It presented the legal obligations they take on when acting as investors in public economic infrastructure, as well as the purpose and benefits of announcements about planned constructions or calls for joint constructions. During the workshops, the Agency also learned about the difficulties faced by the municipalities in this regard, and provided them with professional assistance in finding the best solutions to ensure access for the largest possible share of residents and businesses in each municipality to appropriate communication solutions. The Agency also prepared about 50 written answers to the questions of the public and stakeholders.

Following the entry into force of the Gigabit Infrastructure Act in 2024, the Agency, in cooperation with representatives of Cullen International, organised training for infrastructure operators with the aim of clarifying the measures and provisions introduced by this regulation and addressing any questions.

1.2.14 OTHER TASKS

In 2024, the Agency also dealt with other tasks related to the regulation of emergency communications. Emergency communications include calls, SMS messages and other services involving the call centres for numbers 112, 113 and 116 000. In 2024, the Agency published an amendment to the General act on the quality of emergency communications, which will enter into force in 2025. Consequently, in 2024, it still collected data in on the quality of emergency communications for 2023 using the existing questionnaire. Due to the replacement of technologies and the transition to IP communication protocols and the gradual introduction of artificial intelligence in emergency communications, the Agency also participated in an international seminar organised by the European Emergency Number Association (EENA) on the topic of the introduction of new technologies.

As the society is becoming increasingly digitalised, improving digital literacy among the population is becoming increasingly important for using digital technologies and services. Consequently, the Agency placed a lot of focus on raising awareness of end users in information literacy. With contributions from the fields of information literacy, the Agency actively contributed content and published it on the MIPI portal and sent e-newsletters to subscribers every working week.




In 2024, the Agency received and responded to various questions from the general and professional public regarding the official register of operators. These related to obligations in connection with the official registry of operators and reporting on changes in the electronic communications market.

2 ELECTRONIC MEDIA

2.1 ANNUAL GOALS AND THE STATE OF THE MARKET

TABLE 7: KEY GOALS AND THE STATE OF THE MARKET OF ELECTRONIC MEDIA

KEY OBJECTIVE: ENCOURAGING COMPETITION AND MARKET DEVELOPMENT					
Task/Project	Activities	Objectives	KPI	Result	Comment
Awarding licenses for digital terrestrial radio dissemination	Public tenders for awarding radio station publishers' licenses for the digital terrestrial platform.	Ensuring that listeners have a diverse and interesting range of available radio stations on this platform and encouraging the platform's development.	Holding one public tender.	<div></div>	The public tender for awarding 24 licenses has been completed, and in 2025 another administrative procedure for awarding the rights will be held.
Awarding licenses for digital terrestrial television dissemination	Public tenders for awarding television station publishers' licenses for the digital terrestrial platform.	Provide viewers with access to a wider range of TV channels on this platform and to maintain the platform as the sole free access point to TV channels.	Holding one public tender with detected market interest.	<div></div>	The digital terrestrial platform for commercial TV channels ceased operations due to a lack of interest from broadcasters, therefore a public tender for these licenses was not initiated.

KEY OBJECTIVE: PROTECTION OF USERS AND PROVIDING THEM WITH INFORMATION					
Task/Project	Activities	Objectives	KPI	Result	Comment
Protection of children in audiovisual media services.	Operating the Gledoskop system for the classification and labelling of audiovisual content, heading the guiding committee for content classification.	Protection of children from potentially harmful content in audiovisual media services	A permanent task.		Operating the Gledoskop system, holding 3 meetings of the committee for content classification.
Competent and responsible use of electronic media	Administering the portal and preparing articles for the Media and Information Literacy (MiPi) portal.	Encouraging, promoting and developing media literacy among users of electronic media.	A permanent task.		98 articles published on the MiPi portal.
Improving accessibility of audiovisual media services for disabled persons through an online point of contact	Providing information related to accessibility to audiovisual media services for disabled persons through the online contact point.	Improving accessibility of audiovisual media services for disabled persons through an online point of contact	A permanent task.		Participation with a presentation at the consultation on the accessibility of audiovisual media services (AVMS) for persons with disabilities, 2 meetings and constant contact with representative organisations, resolution of 2 cases of complaints regarding the access of persons with disabilities to AVMS.

2.2 ACTIVITIES FOR ACHIEVING THE GOALS

In 2024, the Agency's activities related to electronic media were primarily focused on the implementation of 2 public tenders for analogue audio broadcasting, a public call for awarding the rights for the digital distribution of radio programming, the implementation of activities in the field of media literacy and accessibility for persons with disabilities to audiovisual media services, activities in the field of contentious advertising of food supplements in the media, and various international activities. The Agency also participated in the preparation of the new Media Act (/ZMed-1).

2.2.1 AWARDING LICENSES FOR DIGITAL TERRESTRIAL RADIO DISSEMINATION

In 2024 the Agency continued with the activities for encouraging the development of digital terrestrial radio platform. The Agency successfully completed the public tender for awarding radio frequencies for terrestrial digital radio broadcasting networks T-DAB+ for the whole territory of the Republic of Slovenia (multiplexes R4 and R5), which are planned to begin broadcasting in the first quarter of 2025. At the same time, the Agency also commenced with activities for launching a public tender for awarding licenses for radio stations broadcasting in digital audio broadcasting technology throughout the territory of the Republic of Slovenia and, considering the planned available capacities of both new multiplexes, tendered 24 licenses. If all licenses were awarded, both multiplexes would be mostly filled, consequently ensuring a range of radio stations for the new networks, which is essential for their operation on the one hand, and on the other hand, the entry of additional stations onto the digital terrestrial radio platform would significantly enrich the range of stations available on this platform. Namely, the Agency designed the public tender in two lots – eight licenses in the first lot were intended for exi-

sting radio stations that are already broadcasting in the tendered area via radio frequencies for analogue audio broadcasting or are already present on smaller areas via the digital terrestrial platform. The other 16 licenses in the second lot were exclusively for new radio programmes that are not yet broadcast on the analogue (FM) or digital (DAB+) platform. Especially with the new programmes, the Agency aims to pursue the goal of enriching radio broadcast programming, contributing to the popularisation and expansion of the digital radio platform. The Agency received the consent of the Broadcasting Council in June 2024 and published the public tender a month later, with the deadline for submitting bids expiring in September 2024. The public tender received 32 bids, nine for the first lot and 23 for the second lot, indicating significant interest in digital terrestrial broadcasting among Slovenian radio station providers.

In 2024, the Agency did not hold any public tenders for awarding licenses for digital terrestrial broadcasting of radio stations in the Ljubljana area (R3) or any public tenders for any remaining slots on the second national digital network (R2), which is divided into the eastern and western parts of the country. Namely, the publishers of some stations currently present on the R3 network or one of the areas of the R2 network applied to the public tender for national digital licenses described above. Therefore, new public tenders will only be launched after the public tender for awarding of digital licenses in the territory of the Republic of Slovenia is concluded, when the Agency will also be able to carry out an analysis of the available capacities and verify the interest of broadcasters.

2.2.2 AWARDING LICENSES FOR DIGITAL TERRESTRIAL TELEVISION DISSEMINATION (DAB+)

In Slovenia, three terrestrial television networks operated in 2024 – one with national coverage (multiplex A) and two local DVB-T networks. At the beginning of 2024, the second national network (multiplex C) ceased operations. Only a handful of TV channels are present on the national digital platform, namely: RTV Slovenija, one with the status of a regional programme of special importance, while two programmes with the status of a local or regional programme of special importance are broadcast via local networks, which are also managed by the broadcasters of these TV channels. In spite of numerous efforts, the digital terrestrial platform has been in decline for some time, and the Agency has not noticed any interest among television broadcasters in recent years for awarding licenses to broadcast TV channels in digital audio broadcasting technology, which is why it did not launch a public tender in 2024 either.

2.2.3 PROTECTION OF CHILDREN IN AUDIOVISUAL MEDIA SERVICES

The Agency performed preventive activities for the protection of children and minors from potentially harmful content in audiovisual media services by monitoring the labelling on television programming and audiovisual media services on demand, and the publishers' use of the Gledoskop tool for rating and classification of audiovisual media content. The Agency held three meetings of the Gledoskop coders' committee, fulfilling its goal. It regularly communicated with the committee's members. This allowed the Agency to resolve some issues regarding classification of content as they cropped up, ensuring appropriate labelling and scheduling of potentially harmful content for children. At these meetings of the coders committee they discussed 15 audiovisual works. In seven cases they were feature films, in six documentary films, and they also discussed one TV series and one news programme. Potentially harmful scenes most commonly included elements of violence, substance abuse, discrimination, nudity, sexuality, and sexual violence. The greatest dilemmas arose in labelling content where potentially harmful elements were not directly or explicitly depicted but were present through other, more abstract methods, through sound effects, protagonists' narratives, the content's theme, which often occurred in cases of discrimination and sexual violence.

In 2024, the Agency did not implement the upgrade of the Gledoskop system and did not train coders, as initially planned. Instead, it proposed to the relevant ministry an amendment to Article 14 of the ZAVMS, and based on this amendment, also an amendment to the General act on the protection of minors in audiovisual media services. The aim of the proposal is to unify the age categories from the ZAVMS with the categories used by the Dutch content classification system Kijkwijzer, which is also used by some global providers in the EU and on which Gledoskop is also based. Kijkwijzer offers an extensive database of already classified foreign content that is also broadcast in Slovenian audiovisual media services. Unification would allow the use of labels directly from the

Kijkwijzer system database for content broadcast by Slovenian providers. Such harmonisation would result in more uniform labelling of content for the widest possible range of users. The differences between the Dutch and Slovenian regulations for the protection of minors are mainly in some age categories, while the method of classifying individual potentially harmful elements, such as violence, frightening content, nudity, discrimination and others, is already very similar in both systems, which means that alignment would not affect the fundamental criteria for content evaluation and these differences would not represent a significant obstacle to alignment. At the European level, Kijkwijzer is recognised as an example of a best practice, which the EC recognises as a possibility for the harmonisation of the protection of children and adolescents at EU level. The transition to the use of the Kijkwijzer system database would mean a significantly smaller personnel and time investment for the AVMS provider to meet the legal requirements regarding the protection of minors from harmful content; there would also be benefits for users. The changes to the ZAVMS were not completed in 2024.

2.2.4 COMPETENT AND RESPONSIBLE USE OF ELECTRONIC MEDIA

Raising awareness among end users is becoming an increasingly important area of activity for media regulators. It appears that in a time of rapid technological progress, regulation is finding it increasingly difficult to address the constantly changing media practices in a timely manner. The responsibility for the safe and competent use of media and digital services therefore often falls on the shoulders of users. And the Agency has now for some time, and even more extensively since 2024, successfully added numerous activities in the field of public media literacy to its existing regulatory and supervisory tasks. The Media and Information Literacy Portal (MiPi), which the Agency launched 2019, is increasingly gaining recognition in the professional and general public.

Media literacy begins in childhood and is a never-ending process. This is also recognised by the members of the MiPi editorial board, who ensure the regular preparation of quality educational content intended for different age groups. The aim of this content is to provide relevant information that raises awareness among end users, notifies them, advises them, and specifically guides them on how to use media and digital services critically and thoughtfully.

In 2024, 98 contributions were published on the MiPi portal, which means that the Agency continued in 2024 with a frequency of two articles per week, as it also set as a goal in the portal's operating strategy. A weekly e-newsletter was also sent to all subscribers. In addition, 108 posts were published on the MiPi portal's social networks, Facebook and Instagram, and through its public relations, the Agency also made sure to promote and broaden the reach of the news and invitations to read the MiPi portal present there.

The Agency devoted most attention when preparing the content to raising general awareness about the importance of media literacy as one of the foundations for good mental health, drawing attention to higher quality content as an important alternative to the all-pervasive world of digital content, numerous useful tips for all social groups, and much attention was also paid to new European regulatory guidelines, specifically new regulatory obligations that now apply in the EU to digital service providers. Because it assumed the role of the Digital Services Coordinator, it also devoted considerable attention to this area, which coincides with the Agency's general vision that the MiPi portal is also an important platform for informing the public regarding its other regulatory powers.

In addition to preparing various types of content, 2024 was also marked by MiPi's participation in numerous national and European campaigns, for which the Agency also prepared content, brochures and other activities aimed at raising public awareness. These were mainly related to disinformation, hate speech, peer-to-peer cyberbullying, and other issues. In 2024, the Agency invited new institutions operating in the Republic of Slovenia that focus on raising awareness about media, digital or information literacy to partner with it; by the end of the year, the portal had 22 partners. With this kind of expansion, the Agency is following the Strategy for the development and operation of the MiPi Portal 2024–2026.

2.2.5 IMPROVING ACCESSIBILITY OF AUDIOVISUAL MEDIA SERVICES FOR DISABLED PERSONS THROUGH AN ONLINE POINT OF CONTACT

By the end of 2024, the Agency had received plans from broadcasters and providers for improving the accessibility of their TV channels and on-demand audiovisual media services for persons with disabilities for the 2025–2027 three-year period from 93 service providers, which is 11 more than in the previous three-year period (2022–2024). This indicates a growing awareness and better understanding among obligated parties of the importance of accessibility for persons with disabilities, which is undoubtedly a result of the Agency's work in the field of accessibility in the past period.

The obligated parties were required to submit data on the planned time scope of individual accessibility techniques provided in 2025, 2026 and 2027, including details of the programming content that will be equipped with various accessibility techniques. The data show that providers still plan to use subtitles for the deaf and hard of hearing in Slovenian-spoken content to the greatest extent, and they also plan to use sign language, subtitles, audio descriptions, etc. Obligated parties are also increasingly using other accessibility techniques that are not expressly mentioned in the Act, resorting to innovations and artificial intelligence. Along with these plans, the Agency received numerous questions and dilemmas from obligated parties regarding specific accessibility techniques and the required scope of accessibility, as the Act is fairly vague in this part. Similarly, in the field of accessibility in 2024, there were no standards to help them introduce accessibility techniques in their services. In 2024, the Agency also assisted in the preparation of the annual report for the EC on accessibility indicators for the ICT field, in which it reported on its authority under the ZAvMS, as well as what its authority will be under the Accessibility of Products and Services for Persons with Disabilities Act, which will come into effect in 2025. The Agency also actively participated with a presentation at the consultation on accessibility to audiovisual media services for persons with disabilities, which was organised by the Association of the Deaf and Hard of Hearing at the Ministry of Culture.

2.2.6 OTHER TASKS RELATED TO ELECTRONIC MEDIA

In 2024 the Agency processed 11 administrative issues regarding television broadcasting licenses based on ZMed. Six administrative procedures were launched at the request of the party, and five ex officio. In 2024 the trend of television channels ceasing to broadcast eased up somewhat, however, some of the licenses were suspended due to bankruptcy proceedings and liquidations of some companies or from being stricken from the mass media register. In this period the Agency processed 16 administrative issues regarding radio broadcasting licenses, 6 of which were initiated ex officio, and the others at the party's request. The Agency did not issue any licenses for new TV channels, but four declaratory decisions on the termination of the validity of the television broadcasting licenses were issued, and two licenses were transferred to new broadcasters.

The register of television broadcasting holders reveals that 64 legal and natural persons held 111 valid television broadcasting licenses at the end of 2024. Fifteen of those hold more than one license and these together hold a total of 62 licenses, which comprises one third of valid licenses. Furthermore, 34 have active licenses to disseminate television programming in digital broadcasting technology. At the end of 2024, 29 licenses for themed television channels were in effect. The register of on-demand audiovisual service providers in the Republic of Slovenia included 24 registered services at the end of 2024, while one provider ceased to provide these services last year, one provider launched a new service, and one had stricken two of its services from the register and entered a new one.

At the end of 2024, there were 57 legal and natural persons who held 168 valid radio broadcasting licenses. There were 16 broadcasters who hold more than one license, for a total of 127, which is more than three thirds of all valid licenses. Publishers of 33 radio stations were part of five different programming radio networks. In 2024 the Agency did not issue any licenses for providing radio activities for any new radio stations, as it did not receive any applications. Numerous licenses for new radio channels were issued in 2020, 2021 and 2022 in anticipation of public tenders for the award of radio programme broadcasting rights in digital broadcasting technology upon the establishment of then-new networks, especially the R3 network, and since then the Agency has not

⁷ Vseh storitev (televizijskih programov in avdiovizualnih medijskih storitev na zahtevo) vpisanih v register je 137.

observed demand for new radio broadcasting licenses. The reasons for this could be the saturation of the radio market, which largely already meets the needs of various audiences with its offerings, and the economic conditions in the radio market, which competes for a relatively small share of advertising revenue compared to the entire media market. 51 radio channels have the license to disseminate radio programming through digital broadcasting across the Republic of Slovenia.

In 2024, the Agency did not conduct any procedures on applications for the acquisition of the status of a station of special importance.

2.2.6.1 ADVERTISING DIETARY SUPPLEMENTS IN TELEVISION PROGRAMMING

Based on the ZAVMS, the Agency is responsible for the regulation and supervision of various aspects of the broadcasting of advertising messages in media services. Their providers must, in the exercise of their media activity, comply with various legal requirements that protect the public interest against the advertising industry's appetite for promoting and boosting the sales of their own products. In 2024, the Agency connected various national bodies and institutions, namely the Inspectorate for Culture and Media, the Ministry of Health, the Health Inspectorate, the National Institute of Public Health, and others, and decided to address media broadcasters about how to identify misleading practices by advertisers of dietary supplements. The Agency organised a press conference where it presented its efforts to the public and informed the media that, despite the profitable market activity of offering their space to dietary supplement advertisers, they cannot in any way turn a blind eye to the responsibility imposed on them by law. The ZAVMS expressly stipulates that advertising messages must not promote behaviour or actions that harm or could harm health, nor market non-medicinal products that are not in compliance with regulations but are presented with properties for the treatment and prevention of diseases, and pose a risk to public health. It also published a position and an appeal to media service providers to comply with the provisions of the law, and at the end of 2024, it also prepared a consultation for TV channel broadcasters to assist them in implementing the legal requirements. The Agency also invited self-regulatory organisations, such as the Slovenian Advertising Chamber, to cooperate, and significantly contributed to highlighting the importance of self-regulation in advertising dietary supplements. In addition to its own activities, it also participated in numerous other events related to dietary supplements.

2.2.6.2 ADVERTISING FOODS IN PROGRAMMING CONTENT AIMED AT CHILDREN

Children and adolescents represent a particularly protected category at all levels of regulation. Due to their age and consequent inexperience and credulity, they are considered users for whom media creators must take special care not to cause them physical, mental or moral harm with their content. This applies to both editorially shaped content and advertising messages. And it is with the latter that numerous interests of advertisers are at play, which is why media regulation constantly strives to protect children as a particularly vulnerable group and, on the other hand, also not to excessively restrict free economic initiatives and the rights of industry and advertisers. The ZAVMS restricts the advertising of specific types of products, such as foods with an increased content of sugar, fats, trans fatty acids, salt or sodium, the excessive consumption of which in the overall diet is not recommended. To achieve this goal, the legislator has provided for a co-regulatory model, namely that media broadcasters must adopt internal rules of conduct regarding such advertisements, which must be designed in such a way as to enable children to develop healthy eating habits in accordance with the nutritional guidelines prepared by the minister responsible for health. As the Agency has cooperated with various stakeholders operating in this field in the past, it once again accepted the invitation of the Slovenian Consumer Association, which, under the auspices of the Ministry of Health and in cooperation with the National Institute of Public Health, decided after several years to conduct an analysis of television advertisements broadcast during children's content. The results of the analysis are planned for 2025, and depending on these, the Agency will prepare appropriate measures together with the competent authorities.

2.2.7 COOPERATION WITH RELEVANT MINISTRIES AND STAKEHOLDERS

In 2024, the Agency was involved in the preparation of amendments to the Media Act (ZMed-1), as the first draft of ZMed-1 was already submitted for public consultation on 12 December 2023. The Agency was a member of

the working group for the preparation of provisions on the assessment of media concentration. The new law also operationalises the European Media Freedom Act (Regulation (EU) 2024/1083), which entered into force in May 2024 and will begin to apply on 8 August 2025. It introduces a new set of rules to protect media pluralism and independence in the EU. Based on this regulation and ZMed-1, which, in addition to operationalising certain areas of the mentioned regulation, also foresees some other changes in the Agency's operations, the Agency is expected to be assigned new competences, which have not yet been definitively determined, as the draft ZMed-1 was submitted to the National Assembly of the Republic of Slovenia for adoption on 31 December 2024 and will be under consideration in 2025.

In 2024, the Agency was also involved in the working group of the Ministry of Public Administration, the purpose of which was to prepare a proposal for an Act on the implementation of Regulation (EU) 2024/900 on the transparency and targeting of political advertising. The regulation demands transparency in political advertising. It does not regulate the content of political advertisements or the conduct and financing of political campaigns, but rather the appropriate labelling of political advertisements, as it stipulates that they must also contain information about the advertiser, their price, and whether targeting techniques were used in displaying the advertisement. The regulation will begin to apply directly on 10 October 2025, and the Agency is expected to gain powers to supervise the implementation of this regulation in the media field.



3 DIGITAL SERVICES

3.1 KEY TASKS OF THE COORDINATOR OF DIGITAL SERVICES IN 2024

TABLE 8: TASKS OF THE COORDINATOR OF DIGITAL SERVICES IN 2024

Task	Goals of the task	Description (permanent activities or projects)	Comment
Establishing the Digital Services Coordinator	Ensure the implementation of all powers under the DSA and ZIUETDS.	Formal establishment of the Digital Services Sector and substantive preparation for the implementation of powers under the DSA and ZIUETDS.	In the Operational and Financial Plan for 2024, individual tasks in this area were not expressly defined, as the Act had not yet been adopted.

3.2 ACTIVITIES FOR ACHIEVING THE OBJECTIVES

The Agency obtained new competence related to digital services on 13 April 2024, when the Act implementing Regulation (EU) on a Single Market For Digital Services (ZIUETDS) entered into force. This Act defines the method of implementing the Digital Services Act (DSA) in the territory of the Republic of Slovenia and assigned the Agency the role of Digital Services Coordinator (DSC). A key part of the activities in 2024 involved preparations for the implementation of the tasks that the Agency obtained in this area, as well as the organisational and personnel establishment of the new Digital Services Sector.

A significant part of the activities in the first year of operation of the Digital Services Coordinator (DSC) also related to understanding the national market for digital intermediary services and identifying the providers. Namely, the Act does not provide for procedures for the registration of intermediary service providers or the acquisition of authorisations for the performance of their activities, and official registers of service providers are therefore not planned. Providers cover a wide range of business activities, including all forms of intermediation and storage of users' data.

A conditional exemption regarding registration under Article 24 of the DSA applies to a smaller but essential part of national providers, namely providers of online platforms that are not small or micro enterprises. These providers are obliged to communicate their decisions regarding restrictions they impose on their users, including explanations, to a publicly accessible, machine-readable database managed by the EC. In the process of the initial registration of providers in the database, the EC also requires the cooperation of national DSCs in terms of verifying the reported data on national providers and their entry into information systems. The Agency carried out verifications and entries in 2024 on an ongoing basis, and also identified other potentially obligated providers who had not yet registered with the EC for entry into the database, and invited them in writing to examine their obligations under the DSA.

In the narrower sense of regulation (issuing administrative and other regulatory decisions), three categories of entities are planned in relation to which the Agency as DSC can conduct administrative proceedings. These are procedures for granting the status of trusted flagger, granting the status of vetted researcher, and approving bodies for out-of-court dispute resolution. In 2024, these administrative procedures had not yet commenced, as the Agency did not receive any applications. The fact is that the DSA enters into areas that have not been regulated before, which requires a certain amount of time for recognition by all relevant stakeholders.

The DSA calls for the preparation of implementing acts by the EC, which it had not yet prepared in 2024; these include guidelines regarding trusted flaggers and an implementing act regarding vetted researchers.

On the other hand, it should also be emphasised that, according to initial estimates, the number of Slovenian entities that could be affected by such administrative procedures is relatively small. Therefore, in 2024, the Agency

strived to ensure that the DSA was adequately recognised in the professional community, as its cooperation is in the interest of the Republic of Slovenia.

The ZIUETDS assigned the Agency, as the DSC, the competence to carry out calls for co-financing the operation of trusted flaggers. In 2024, it was not possible to carry out the call, as the Agency had not yet granted trusted flagger status to any potential candidate; the Agency plans to do so in 2025. However, the Agency carried out public awareness activities regarding both the role of the DSC and the DSA.








The Agency also endeavoured to establish contacts with all the most relevant state authorities and other organisations operating in the field of online environment safety and transparency. To this end, it held a series of bilateral meetings at which it presented the importance and content of the DSA and related issues, primarily with the aim of establishing appropriate national coordination of activities in key areas and thereby bringing to life a cooperative ecosystem in the field of digital services.






4 POSTAL SERVICES

4.1 ANNUAL GOALS AND THE STATE OF THE MARKET

TABLE 9: KEY OBJECTIVES IN THE ELECTRONIC COMMUNICATIONS

KEY OBJECTIVE: ENCOURAGING COMPETITION AND MARKET DEVELOPMENT					
Task/Project	Activities	Objectives	KPI	Result	Comment
Regulation of separate accounting	Calculation of WACC and RAB for the universal postal service.	Ensuring compliance of the cost model.	Calculating WACC with RAB by 31 December 2024.		WACC with RAB was calculated and published on the website after the consultation.
	Reviewing the justification of Pošta Slovenije's request for payment of a fee for providing the universal postal service	Establishing potential undue financial burden related to providing the universal service.	Procedure completed by 31 December 2024.		The decision for establishing unfair financial burden for 2021 was issued. The applications for 2022 and 2023 are still in procedure, while decisions for 2017 and 2018 will be issued shortly.
Encouraging competition	Analysis of technological trends in the postal sector.	An in-depth insight into new technologies in the sector, as a tool for assessing efficiency.	Completed by 31 December 2024.		The analysis was carried out at the end of the year; the Agency received the document in November 2024.
Establishing state of the postal services market	A comparative analysis of prices and quality in cross-border parcel delivery services.	Improving public information on the prices and quality in cross-border parcel delivery services.	Completed by 15 December 2024.		The analysis was completed and published in November 2024.
	Survey of the needs of users of postal services (general and business customers).	Establishing user needs following changes in the environment.	Completed by 15 December 2024.		The survey was completed and published in November 2024.
	In 2023 the Agency prepared the Annual report on the state of the market for the year 2023.	Obtaining statistical data from the postal services market.	Completed by 31 October 2024.		The analysis was completed and published in December 2024.
	Survey of consumer purchasing habits for online shopping (emphasis on the delivery of goods).	Establishing the conditions for the biggest generator of future shipments.	Completed by 31 December 2024.		The survey was completed and published in November 2024.

KEY OBJECTIVE: PROTECTING USERS AND ENSURING THE PROVISION OF THE UNIVERSAL SERVICE

Task/Project	Activities	Objectives	KPI	Result	Comment
Regulation of the universal service	Issuing the approval to the prices and general terms and conditions of universal postal service provision	Ensuring the provision of the universal postal service in line with the needs of the users and the market and at affordable and cost-based prices.	Issuing a decision within 45 days of receiving an application.		All the approvals for price changes and general terms and conditions were issued within 45 days of receiving the application.
	Processing applications for transforming or closing contact points.	Care for the interest of users in the transformation of the postal network.	Issuing a decision within 2 months of receiving an application.		In 2024 the Agency did not receive any applications.
	Reviewing the methodology and the results of quality measurements of letter mail and parcel delivery.	Verifying whether the required quality of the universal service was achieved.	Within 4 months of receiving the report from Pošta Slovenije.		The evaluation of the methodology and the measurement results was completed in cooperation with an external provider, and the high quality was confirmed.

In 2024 the Agency completed the most planned tasks in the regulation and supervision of the postal services market. There were delays in the task related to updating the system for collecting and displaying the data on the postal services market, which begun in 2022 and has not been completed yet. There were still some delays related to the performance and publication of surveys and analyses, as one of the public order procedures had to be repeated, which did not impact the content.

In relation to ensuring accessible universal service, the Agency continued its focus on adherence to the legal requirement for forming universal postal service prices and the general terms and conditions for performing the universal service. The universal postal service provider Pošta Slovenije submitted a request to change the prices of providing the universal service in domestic and international traffic in the first half of the year, and once again before the end of the year. The Agency issued an approval to the prices of the universal postal service in domestic and international postal traffic, and they came into effect on 3 May 2024 and on 1 January 2025.

With the aim of establishing clear and transparent instructions for determining the components of applications submitted by the universal postal service provider in the procedure for obtaining consent to change the prices of services from the universal service basket, the Agency designed and published the Recommendations on price changes of the universal postal service. This created a uniform framework for preparing the applications that will support a fast, effective and transparent review.

In 2024 the Agency removed three provider from the register of postal service providers.

TABLE 10: NUMBER OF POSTAL SERVICE PROVIDERS AS OF 31 DECEMBER 2024

Type of entry into the official registry	Number of providers
Universal postal service provider	1
Postal service providers	21
Provider of interchangeable postal services	6

In 2024 the Agency prepared the Annual report on the state of the market for the year 2023. As it established in the report, the trend of declining letter mail continued with another 10% decline. The multi-year trend of increasing parcel volumes also continued, with the quantity of parcels in domestic traffic exceeding 25 million for the first time.

The Agency the following conducted surveys and analyses with the support of external contractors:

- comparative analysis of prices and delivery times,
- analysis of technological trends in the postal sector,
- survey on user satisfaction with postal services and their needs for the general public,
- survey on user satisfaction with postal services and their needs for businesses,
- survey on consumer purchasing habits for online shopping.

The Agency also carried out several internal analyses in order to obtain an in-depth and systematic review of specific topics, such as an analysis for a potential amendment to the General act on the quality of the provision of universal postal service. It established found that the general act is among the more demanding ones, but the universal postal service provider meets the requirements.

Besides the above, the Agency also continued participating in ERGP (European Regulators Group for Postal Services) and CERP (European Committee for Postal Regulation). The Agency was active in all of ERGP's working groups and also organised a meeting of the ERGP working group that focuses on sustainable approach to providing postal services, and a meeting of the ERGP contact group. The Agency regularly helped and exchanged best practices with other regulators of the postal services market, and contributed a lot of information to the Study on the future of the postal sector at the European level.

The audit of the provision and financing of the universal postal service required a lot of activities and the provision of information and input data. The Court of Audit of the Republic of Slovenia concluded the audit at the end of 2024 and issued the report and a request for the submission of a response report.

The Agency also conducted several other activities aimed at ensuring sustainable, regular, and uninterrupted provision of the universal postal service at the prescribed quality level and affordable prices. It delivered 39,300 AKOS stickers on the prohibition of delivery to mailboxes for sale by consignment to Pošta Slovenije, and ordered 100,000 new ones.

With regard to bilateral relations, the Agency participated in HAKOM's Postal Services Day and hosted representatives of the Ministry of Transport and Post from Montenegro at a longer meeting. The Agency prepared a new calculation of the weighted average cost of capital (WACC) for the provision of the universal postal service and the regulatory asset base (RAB) for the provision of the universal postal service.

4.2 ACTIVITIES FOR ACHIEVING GOALS

4.2.1 REGULATION OF SEPARATE ACCOUNTING

In 2024 the Agency fulfilled its goals in the regulation of separate accounting. With the help of an external contractor the Agency calculated the amount of the Weighted Average Cost of Capital (WACC) for the provision of the

universal postal service by Pošta Slovenije as at 31 December 2023, which amounts to 7.61%. Also, with the help of an external contractor and based on the weighted average cost of capital, the Agency calculated the capital employed in Pošta Slovenije, which ensures the provision of the universal postal service.

Until 30 June 2024 the Agency conducted an assessment of tariffs related to the Regulation on cross-border parcel delivery, namely the prices for which the EC assessed to be potentially too high. The Agency established through this assessment that the prices are not unreasonably high. It took into account bilateral amounts, domestic prices in destination countries and costs for performing such services.

In 2024 the Agency received a new application from Pošta Slovenije for the calculation of the net costs of the universal postal service provider for 2023. The Agency issued a decision regarding the net cost for 2021, in which it did not identify it. It received the calculation of the net cost for 2018 for reassessment.

Despite not planning to prepare the Recommendations on price changes of the universal postal service, the Agency laid down and published them in 2024. By publishing the recommendations, which are not obligatory for the universal postal service provider, the Agency established clear and transparent instructions for determining the components of applications submitted by the universal postal service provider in the procedure for obtaining consent to change the prices of services from the universal service basket. This created a uniform framework for preparing the applications that will support a fast, effective and transparent review. This also addresses cases where the provider does not have an audited annual report, but the application can still be processed with appropriate justification from the provider.

4.2.2 ESTABLISHING STATE OF THE POSTAL SERVICES MARKET

The Agency fulfilled the goals it set, as it obtained the relevant statistical data, conducted the annual analysis of the postal services market for 2023, and published the Annual report on the state of the market. It also conducted other analyses and surveys with the help of an external contractor, namely: a comparative analysis of the prices and delivery times of parcels in cross-border traffic, a survey on consumer shopping habits when making online purchases with a focus on the delivery of goods, and the annual surveys on satisfaction/needs of users with postal services (general and business users). In 2024, the Agency substantively upgraded the surveys and aligned them in accordance with the comments received from the interested public.

The Agency also successfully obtained the prices from providers of cross-border parcel delivery, and submitted them to the European Commission for European comparison. In accordance with Regulation 2018/644/EU the Agency also collected other required data from parcel delivery providers.

In 2024 the Agency continued updating the system for collecting and displaying the data on the postal services market.

4.2.3 FOSTERING COMPETITION IN THE POSTAL SERVICES MARKET

The Agency fulfilled its goals regarding fostering competition in the postal services market. With the help of an external contractor, the Agency conducted an analysis of technological trends in the postal sector, through which it gained insight into the state of current technological solutions and concrete proposals for potential changes to points for accepting and delivering postal items, different address and signature management, communication of expected delivery times, redefinition of quality, work permits, and the promotion of green practices. The Agency also entered and removed postal service providers from the official records.

4.2.4 REGULATION OF UNIVERSAL POSTAL SERVICE PROVISION

In 2024 the Agency met its goals and achieved its planned results in the regulation of universal service provision. Users of postal services were provided with permanent and regular provision of the universal postal service at the required level of quality across the whole territory of the Republic of Slovenia. The provision of the universal postal service was carried out at prices that were non-discriminatory and accessible to all users.

Pošta Slovenije submitted two applications for changes to the prices of the universal service. The Agency issued all consents before the required deadline, namely for prices in domestic and international postal traffic.

The Agency monitored the measurement of the letter mail delivery times of Pošta Slovenije, taking into account the requirements of the SIST EN 13850:2020 standard, and together with a contractor conducted an assessment of the methodology and the quality measurement results for 2023. It confirmed that the results for 2023 are comprehensive, reliable and true. Together with the contractor, the Agency also verified the results of measuring the quality of parcel delivery, based on the technical recommendation SIST-TP CEN – TR 15472:2007, where it established a high quality of parcel delivery provision. In both assessments, the Agency established we have one of the highest qualities of postal item transmission in the EU.

There were no activities regarding changes to the universal postal service provision network in 2024, and the Agency did not issue any such rulings.

4.2.5 THE AGENCY'S INVOLVEMENT IN THE INSTITUTIONAL ENVIRONMENT






In 2024, the Agency collaborated with the relevant ministry in examining issues in postal services, with a focus on financing of the universal postal service.



5 RAILWAY TRANSPORT

5.1 ANNUAL GOALS AND THE STATE OF THE MARKET

TABLE 11: KEY OBJECTIVES IN RAILWAY TRAFFIC REGULATION

KEY OBJECTIVE: ENCOURAGING COMPETITION AND MARKET DEVELOPMENT					
Task/Project	Activities	Objectives	KPI	Result	Comment
Monitoring the market – train slot allocations, the charges for the use the PRI, and performing the efficiency regime	Monitoring of the service market in railway passenger and freight transport (number of passengers transported, quantity of goods transported, work performed, market shares of carriers).	Obtaining key information on the development of competition.	Completing a half-year analysis by 30 September, and the annual analysis by the end of the 2nd month of the following year.		The half-year analysis was completed in September 2024. The analysis for 2023 was completed in February 2024.
	Monitoring train slot allocations and regular monthly analyses of the realization of allocated train paths by individual carriers.	Ensuring improved utilisation of allocated train slots and efficient use of PRI.	Publishing the annual report on the state of the market in 2020 in the first half of 2024.		The Annual report on the state of the market for the year 2023 was completed and published in May 2024.
	Monitoring the billing of the usage fees for access to PRI and calculating the efficiency regime.	Ensuring fair and legal usage fee billing for access to PRI.	Performing monthly analyses by the end of the next month.		The Agency monitored train path assignments on a daily basis. The analyses of performance for all carriers was conducted monthly within the set deadlines (at 100 % completion).
			Monthly verification of the usage fee billing by the end of the next month.		Usage fee billing and efficiency regime were verified in accordance with the set deadline.
Access to facilities and devices for providing additional railway services and service billing	Monitoring access to facilities and devices, monitoring service provision and monitoring service billing.	Ensuring equal access to facilities and equipment, ensuring the provision of services to all applicants under equal conditions, and ensuring appropriate charging for these services (costs and reasonable profit).	Monthly verification of the situation by the end of the following month.		The Agency regularly verified the provision of equal access to facilities and equipment for additional services. Based on the administrator's monthly reports, the Agency regularly verified that the charged fees for access to facilities are equal for all players. The cost verification of charging for additional services in 2024 has not yet been completed.




KEY OBJECTIVE: USER PROTECTION					
Task/Project	Activities	Objectives	KPI	Result	Comment
Ensuring the passenger rights in railway passenger transport – implementation of Regulation (EU) 2021/782, resolving passenger complaints, determining passenger satisfaction	Timely regulatory response to the changes on the market through posts on the Agency's website.	Informing passengers about their rights and obligations in accordance with the Regulation on the rights and obligations of rail passengers.	Monthly monitoring of potential changes in the railway passenger transport market.		The Agency regularly provided passengers with all the necessary information in case of questions relating to their rights and obligations and guided them with instructions regarding the possibilities and manner of submitting complaints.
	Resolving passenger complaints in accordance with the Regulation on the rights and obligations of passengers in railway transport.	Protection of passengers, especially the most vulnerable groups, in case of violation of their rights.	Resolution of complaints within the statutory deadline of 3 months after receiving them in 90% of cases.		The Agency resolved 100 % of the received complaints within the statutory deadline in accordance with the Regulation.
	Conducting a survey on the satisfaction of end-users (passengers) with the carrier's services.	Familiarising the Agency with passenger satisfaction regarding the quality of services.	Conducting the survey and publishing the results by the end of the third quarter.		Due to the rejection of the rate for 2024 and the consequent reduction in the Agency's revenues, the survey could not be carried out with the help of an external contractor.

TABLE 12: ADDITIONAL TASKS THAT HAD NOT BEEN PLANNED

Task	Goals of the task	Description (permanent activities or projects)	Comment
Railway Transport Act	Preparing the proposed changes and amendments to the Railway Transport Act.	Submitting the Agency's comments related to changes to the Railway Transport Act.	The Agency regularly submitted its positions and comments to the Ministry of Infrastructure on the draft amendments to the law, which was still in the inter-ministerial cooperation phase in 2024.
Proposal for the TTR Regulation (Regulation of the European Parliament and of the Council on the Use of rail infrastructure capacity in the single European railway area)	Submitting the Agency's positions regarding the proposed Regulation.	Submitting the Agency's comments on the proposed Regulation to the relevant Ministry of Infrastructure and to the Directorate-General for Mobility and Transport (DG-MOVE) of the European Commission within the framework of IRG-Rail association collaboration.	The Agency continued to submit its positions on the proposed Regulation to the relevant ministry and the EC, as part of international cooperation through the IRG-Rail association.
Financing the Agency in the field of railway market regulation	Resolving the financing of the regulatory body in the field of the railway market, which will be more appropriate for the obligated party.	Alignment of the methodology for the distribution of obligations between the obligated party and submitting the proposal for the amendment of the legal basis to the relevant ministry.	The Agency aligned the method of distributing payment obligations of obligated parties to the relevant ministry and transmitted the proposal for the amendment of Article 18.e of the ZZelP, which regulates the financing of the regulatory body in the field of the railway market.
Analysis of the PRI operator's report on revenues, costs and profit for the purpose of charging usage fees	Verifying whether the PRI operator regularly updates the Methodology for calculating usage fees in accordance with the actual situation.	Establishing whether the operator adequately and regularly records changes to the processes listed in the Methodology for calculating usage fees and, within this scope, also updates its own prices.	In the proceedings, the Agency established whether the operator regularly updates the Methodology for calculating usage fees with regard to the actual costs, revenues and scope of services of the current year.

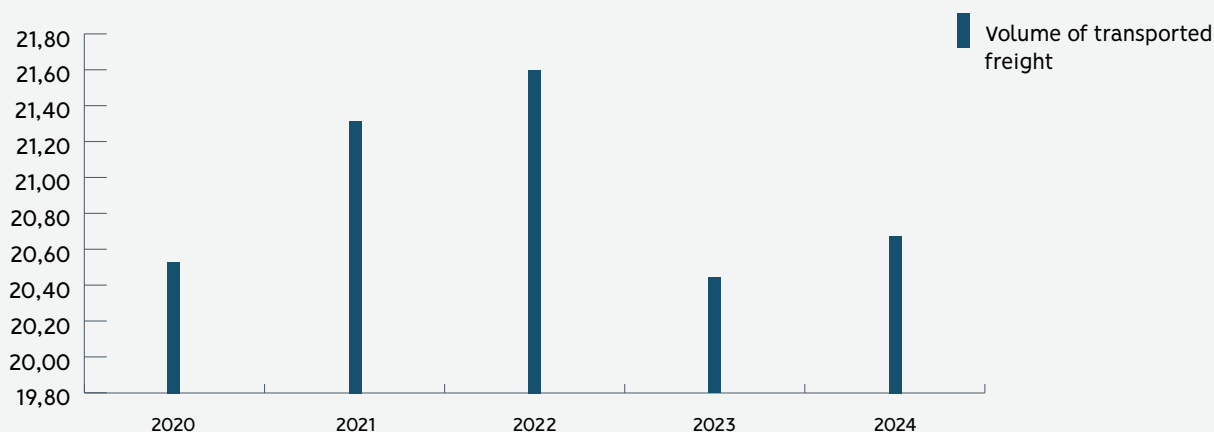
In Q2 of 2024 the Agency prepared and published the Report on the development of the market of railway services and the Agency's activities for 2023. The report was prepared on the basis of the annual analysis of the main market indicators, which the Agency carries out from the data provided by the manager of the public railway infrastructure (PRI) and carriers in freight and passenger transport. The report also includes basic comparative data on the state of the market with other EU member states, which are obtained in the report of the Market Monitoring working group within the Independent Regulators' Group-Rail (IRG-Rail).

5.2 CURRENT STATE OF THE MARKET

In 2024, a new carrier entered the rail freight transport services market, bringing the total number of carriers providing transport services to eight. In past years the business environment of rail freight transport has been marked by several factors. The Slovenian railway market is facing a significant increase in costs and inflation, which negatively affects competitiveness in the sector. The latter has suffered a decline in individual railcar shipments, partly due to the war in Ukraine. High costs are also caused by higher electricity prices. Although logistics is among faster growing industries, the railway sector in Slovenia is currently not growing, as the network is under construction or modernisation until 2026 (reconstruction of the Ljubljana-Divača line, the second track Koper-Divača, Ljubljana railway station, etc.). An increase in freight transport is expected after 2026, when the aforementioned investment works on the railway network will be completed.

Based on the carriers' reports, the Agency notes approximately a 4% growth in work performed, expressed in billions of net tonne-kilometres, and approximately a 1% growth in goods transported, expressed in millions of tonnes, in the rail freight transport services market. A total of 20.7 million tonnes of goods were transported on the public railway infrastructure of the Republic of Slovenia in 2024, with the carriers performing a total of 5.145 billion net tonne-kilometres. Given the small size of the Slovenian economy compared to other EU member states and considering the fact that Slovenia is a transit country due to its geographical location, and considering that rail freight transport is competitive over distances exceeding 250 km, most transport services are performed in international traffic.

FIGURE14: VOLUMES OF TRANSPORTED FREIGHT ON THE PRI FOR THE PERIOD FROM 2020 TO 2024



On the market of passenger railway transport services, these were in 2024 again conducted by a single carrier, SŽ-Poštniški promet, which means that the majority of transport services was performed as part of its public service obligation of providing passenger transport in domestic and cross-border railway traffic. In 2024, a total of 18.74 million passengers were transported over the public railway infrastructure of the Republic of Slovenia, of which 17.19 million were in domestic traffic.

More detailed data on rail freight and passenger transport and a comparison with markets in other EU member states are published by the Agency in the Annual Report on the Railway Services Market and the Agency's Activities.

5.3 ACTIVITIES FOR ACHIEVING THE OBJECTIVES

Because the Government of the Republic of Slovenia did not approve the 2024 Rate for the operation of the regulatory body in the field of railway transport, the Agency financed its activities with payments from obligated parties in accordance with the valid 2023 Rate, which resulted in a 30% shortfall in planned revenues for this field. Consequently, the Agency had to limit the implementation of activities to the minimum scope of legally defined tasks, which meant a temporary freeze on two vacant systematised posts and two planned projects that were to be carried out with the help of external contractors, namely a survey on passenger satisfaction in railway passenger transport and a project to calculate the weighted average cost of capital (WACC) of the operator. In addition, the Agency limited the costs of business trips and predominantly attended international meetings via video conferences. Consequently, the Agency also did not organise the planned events in this area, such as the working group meeting of IRG-Rail in Ljubljana.

Despite this, in the field of regulation of the railway services market, the Agency continued its efforts to co-create competitive conditions for efficient railway transport and the associated improvement in the quality of services in this market, paying particular attention to regularly monitoring competitive conditions in the market, as a good understanding of the situation is crucial for effective regulation.

The Agency monitored the activities of the public railway infrastructure (PRI) operator's allocation of train slots for each carrier on a daily basis, thereby verifying whether the PRI operator ensures equal treatment for all carriers or applicants. In 2024, the Agency paid particular attention to the allocation of train slots for a specific purpose to freight carriers for trains heading towards the Port of Koper, checking whether the PRI operator consistently complies with the provisions of the measures to improve freight train traffic, which it published in March 2024.

By regularly monitoring the utilisation of the PRI and preparing monthly utilisation analyses, the Agency completed its activities for its efficient use. Regular analyses of the realisation of allocated train slots, which the Agency has been carrying out since the transfer of the competence of the regulatory body in the field of railway transport from the then Ministry of Transport, show a relatively high proportion of cancelled train slots throughout the monitoring period, which negatively affects the utilisation of the infrastructure.

With the aim of ensuring fair, equal and lawful fee charging for to all carriers, the Agency also regularly monitored the correctness of charging usage fees for access to the PRI and the calculation of delays under the efficiency regime in 2024, based on the monthly reports of the PRI operator.

In the context of verifying the usage fees for services in the railway transport market provided by the operator, the Agency called on the PRI operator to submit a report to the Agency on the revenues, costs and profit from charging for the use of the PRI, and called on the operator to update the calculation of price items, as these were based on costs from 2017.

By regularly verifying whether providers of access to facilities for additional service provide them to all carriers under equal conditions and set the prices in accordance with the valid regulation, the Agency strived to ensure equal access to facilities where additional services are provided.

The Agency collaborated with the competent Ministry of Infrastructure in preparing amendments to the Railway Transport Act and provided the Ministry with its position on the proposal for a new European Regulation of the European Parliament and of the Council on the use of railway infrastructure capacity in the single European rail area, amending Directive 2012/34/EU, and repealing Regulation (EU) No 913/2010. In addition, due to the rejection of 2024 Rate on the value of the point and on the amount of the share in relation to the charged usage fee for the use of public railway infrastructure, for the operation of the regulatory body in the field of railway transport, it updated the methodology for the distribution of obligations among obligated parties and proposed to the relevant ministries, the Ministry of Infrastructure and the Ministry of Environment and Spatial Planning, an amendment to the provisions of Article 18.e of the Railway Transport Act, which regulates the financing of the Agency in the field of railway market regulation.

5.3.1 ENSURING EQUALITY IN TRAIN PATH ALLOCATIONS

With the aim of ensuring equal access to the PRI for all applicants, the Agency monitored the allocation of train slots on a daily basis, paying particular attention to the allocation of train slots for a specific purpose (ad-hoc train slots) to freight carriers for trains heading towards the Port of Koper. It verified whether the PRI operator consistently complies with the provisions of the measures to improve freight train traffic, which it published in March 2024. To this end, the Agency additionally carried out two supervision procedures, and in one case of procedure against the PRI operator, it established that the operator had not fully complied with the measures prescribed by its own act.

5.3.2 ENSURING OPTIMUM UTILISATION OF THE INFRASTRUCTURE

With the aim of ensuring optimum infrastructure utilisation, the Agency had, in the scope of its tasks of monitoring competition on the railway transport services market the regularly monitored the utilisation, i.e. realization of allocated train slots on the public railway infrastructure. In 2024 the Agency analysed the realization of allocated train slots by individual carriers based on the data it obtained from the manager's online app, and compared them with the manager's monthly analyses.

As in previous years, a large number of ordered train slot cancellations by carriers was recorded. It should be taken into account that in 2024, the manager introduced a rule that a carrier must cancel a freight train that is more than 12 hours late at the initial station and order a new ad-hoc train slot instead of the cancelled one, as part of measures to improve freight train traffic. More detailed data on the utilisation of PRI is published by the Agency in the regular annual report on the railway services market and the Agency's activities.

The Agency paid particular attention to monitoring train traffic on the railway section between Divača and Koper. This railway section is declared as congested infrastructure, therefore stricter criteria for the withdrawal of insufficiently used train slots must be taken into account for it.

5.3.3 ENSURING CHARGING EQUAL USAGE FEE AND PERFORMING THE EFFICIENCY REGIME

As part of ensuring that charged usage fee is correct, honest and applies equally to all, the Agency monitored in 2024 whether carriers are charged the correct usage fee for access to the PRI for the minimum bundle of services. Based on the monthly reports from the PRI manager, the Agency established whether usage fees are billed to the carriers without distinction and in accordance with the methodology and valid regulations. It did not find any major irregularities. As the new methodology for charging the usage fee entered into force at the beginning of 2023, the Agency requested an annual usage report on charging the usage fee from the manager. This report includes a statement of the allocation of costs and revenues from charging usage fee for the reporting year and a report on the amendment to the methodology for charging the usage fee. In the report, the Agency verified whether the manager ensures compliance with the first subparagraph of the first paragraph of Article 29 of the Directive (in conjunction with Section 2 of Chapter IV of Directive 2012/34/EU), which requires that member states establish a framework for charging usage fees, taking into account the manager's independence. The Agency did not take a position on the content and correctness of the calculation of the usage fee, but verified whether the manager adequately and regularly records changes in the processes from the methodology for calculating the usage fee. Namely, the methodology represents the basis on which the manager prepares the calculation of the usage fee for railway transport services it performs. One of the Agency's key tasks is to regularly monitor changes, which was also the purpose of the described procedure. A validly compiled and verified document, i.e. methodology, in which business events are expressed in value and, in certain cases, also in quantity, is the basis and subject of accounting treatment and a condition for the credibility of accounting data and information, and consequently also for the Agency's regulatory tasks. In the scope of the verification of usage charges for services on the railway transport market performed by the PRI manager, the Agency called on the manager to update the calculation of price items, as these were based on costs from 2017. Consequently, in the updated version of the methodology for charging the usage fee, the manager calculated and presented new own prices for railway transport services.

With the aim of ensuring optimum use of public railway infrastructure the Agency focused a part of its activities in 2024 to the efficiency regime, which encourages carriers in the railway traffic and the PRI manager to reduce disruptions to the railway network and to improve the quality of performing export services. As part of this the Agency monitored how monetary compensations from the efficiency regime are paid out and encouraged the stakeholders on the railway services market towards optimum use of the public railway infrastructure.

5.3.4 ENSURING EQUAL ACCESS TO FACILITIES FOR ADDITIONAL SERVICES AND THE SERVICES PROVIDED THEREIN

In accordance with the Commission Implementing Regulation (EU) 2017/2177 of 22 November 2017 on access to service facilities and rail-related services the Agency prepared and published at the end of 2019 the guidelines that define the procedures and measures for excluding the application of some provisions on the managers of facilities and devices. In 2024 the Agency again received no requests for exemption.

As part of cooperation with the administrator of the PRI in the preparation of the Network program, which includes descriptions of facilities for performing additional and railway related services, the Agency monitored the performance of the implementing regulation in connection with the obligation imposed on managers of these facilities to prepare and publish descriptions of facilities and equipment for providing additional railway services. The Agency called on the relevant stakeholders to transparently publish information regarding the facilities for providing additional services, as well as the services themselves. With the aim of ensuring equal access to facilities and equipment for the provision of additional railway services and the provision of services in these facilities, the Agency initiated three supervision procedures and one ex officio procedure for monitoring competitive conditions in the railway services market.



5.3.5 PROTECTION OF PASSENGERS IN RAILWAY PASSENGER TRANSPORT

In accordance with the Regulation on the Implementation of Regulation (EC) No. 1371/2007 of the European Parliament and of the Council on the rights and obligations of passengers in railway transport, the Agency is responsible for resolving complaints from passengers in case of violation of their rights under this regulation. In addition to handling complaints, the Agency informed passengers about their rights and obligations on its website and provided them with necessary information.

The Agency resolved all complaints from railway passengers within the time limits laid down by Regulation (EU) 2021/782.

In individual cases, the Agency detected a suspected infringement of Regulation (EU) 2021/782. However, the amendment to the ZZelP, which would designate the new competent enforcement authority for the supervision of the implementation of the aforementioned Regulation, had not been adopted by the end of 2024. Similarly, the Inspectorate of the Republic of Slovenia for Infrastructure, where railway transport inspectors operate (and who were competent for the supervision of the Regulation based on the Decree on the Implementation of the Regulation (EC) on the Rights and Obligations of Rail Passengers), declared itself not competent as a supervisory authority.




5.3.6 THE AGENCY'S INVOLVEMENT IN THE INSTITUTIONAL ENVIRONMENT





In 2024 the Agency continued its cooperation with the Ministry of Infrastructure (MzI) in the preparation of the Act on Changes and Amendments to the Railway Transport Act that details the implementation of Regulation (EU) 2021/782 on rail passengers' rights and obligations, with which the Agency will receive authority of the body for enforcing this European regulation. For the most part the cooperation was related to the preparation of comments and proposed amendments to the proposal for a Regulation of the European Parliament and of the Council on the use of railway infrastructure capacity in the single European railway area, amending Directive 2012/34/EU and repealing Regulation (EU) No 913/2010.





In addition, due to the rejection of 2024 Rate on the value of the point and on the amount of the share in relation to the charged usage fee for the use of public railway infrastructure, for the operation of the regulatory body in the field of railway transport, it updated the methodology for the distribution of obligations among obligated parties and proposed to the relevant ministries, the Ministry of Infrastructure and the Ministry of Environment and Spatial Planning, an amendment to the provisions of Article 18.e of the Railway Transport Act, which regulates the financing of the Agency in the field of railway market regulation.







IX SUPERVISION

TABLE 13: KEY OBJECTIVES – MARKET SUPERVISION UNDER THE AGENCY'S AUTHORITY

KEY OBJECTIVE: ENCOURAGING COMPETITION AND MARKET DEVELOPMENT					
Task/Project	Activities	Objectives	KPI	Result	Comment
Supervision of electronic communications	Verifying the correctness of operators' entries in the Agency's registers, verifying the timeliness and correctness of reporting to the Agency in the collection of market data, procedures regarding the rational use of numbering space, fulfilment of DARF requirements. Implementing up to 3 such supervision procedures.	Ensuring equivalent and transparent conditions for the operation of all stakeholders in the electronic communications services market, protection of competition, protection of confidentiality and privacy of communications, protection of end-users' rights, ensuring the security of networks and services and compliance with the open internet rule, rational use of numbering space, lawful implementation of the international roaming regulation, correctness and timeliness in reporting data for monitoring the state of the market and updating data from the Agency's official registers.	Implementing approximately 400 supervision procedures, of which around 20 are exceptionally demanding in the field of competition protection, which have the highest priority.		In the field of electronic communications, the Agency initiated a total of 163 supervision procedures, which is just over 50 % of the set KPI. There were no new supervision procedures regarding the implementation of obligations imposed by regulatory decisions. However, supervision procedures from previous years, which the Administrative Court of the Republic of Slovenia returned to the Agency for re-evaluation, were handled with priority.
	Verifying the implementation of obligations arising from the Agency's regulatory decisions.				
	Supervision procedures related to the protection of privacy and confidentiality of electronic communications, verification of the provision of universal service, verification of the implementation of transparency. Verification of ensuring the security of networks and services and reporting on incidents, and compliance with open internet legislation.		At least 40 % of procedures completed within 90 days.		More than 40 % of the initiated supervision procedures were completed within 90 days.
			Ensuring that the share of tardy cases does not exceed 10 %.		Due to the complexity of the subject matter, only the supervision procedures in the field of competition protection were not completed within 6 months, and these accounted for less than 10 % of all supervision procedures.

Supervision in shared construction and shared use of PUI	Inspection supervision of the published intentions for construction and providing access to existing infrastructure.	Improved coverage of the country with high-speed electronic communication networks.	Holding at least 12 preventive supervisions, i.e. 1 monthly.		4 inspection procedures of construction intention notices and provision of access to existing infrastructure upon notification were initiated, and 5 procedures in this area were completed. No procedure was initiated preventively. The Agency prioritised the recording of infrastructure.
	Inspection supervision of record keeping of the telecommunications infrastructure in the RS and the suitability of easement agreements for shared use of public utility infrastructure.	The comprehensiveness and availability of information on the existing infrastructure in order to lower the prices of constructing new TC networks.	Holding at least 16 preventive supervisions, i.e., 1-2 per month.		The Agency launched 35 supervision procedures regarding the recording of telecommunications infrastructure in the Republic of Slovenia and the suitability of easement contracts for shared use of public economic infrastructure, of which 33 were preventive. It completed 58 such supervision procedures.
			Ensure 90 % of cases are resolved without administrative litigation, and in the event of administrative litigation, resolved in favour of the Agency.		No administrative disputes were launched.
	Conducting measurements on fixed connections of different operators at the measurement point and in the field. Monitoring the development and the implementation of new access technologies in mobile and fixed networks, and adapting methods of measurement.	Observing the characteristics and measuring the parameters of providers' mobile and fixed access networks, monitoring their development and upgrades.	The Agency estimates that there will be several hundred thousand measurements in the database.		Several hundred thousand measurements were performed.

Supervision of radio frequency spectrum	The supervision of the utilisation of radio frequencies and resolving the issues of DARF holders during interference.	Ensuring uninterrupted use of radio frequencies to all DARF holders.	<p>Launching approximately 30 supervisory procedures by 31 December 2024.</p> <p>Achieving a 90% share of the annual plan of supervisions.</p> <p>Resolving 75 % of the procedures within 3 months.</p>	 <p>30 supervision procedures were initiated, of which 90% were in the scope of the annual plan of supervisions. More than 75 % of the procedures were resolved within 3 months.</p>
Supervision of electronic media	<p>Collecting reports on achieved shares of European and Slovenian audiovisual works.</p> <p>Supervision of the appropriate placement and promotion of European and Slovenian audiovisual works in on-demand audiovisual media services.</p> <p>Supervision of the scope of advertising in TV programming.</p> <p>Supervision of product placement.</p> <p>The supervision of fulfilling the conditions for the status of stations of special importance.</p> <p>Supervision of the protection of children from potentially harmful content in on demand audiovisual media services.</p> <p>Supervision of measures for protecting the users of video sharing platforms.</p> <p>Collecting plans from audiovisual media service providers regarding improvements of access to their services for disabled persons for the 2023–2024 period.</p> <p>Resolving complaints related to accessibility of audiovisual media services for disabled persons through an on-line point of contact.</p> <p>Launching inspection supervisions following reports.</p>	Ensuring equal conditions for the operation of all stakeholders on the market, and protecting the interests of the viewers and listeners of programming and users of media services and video sharing platforms.	<p>Launching at least 40 preventive supervision procedures by 31 December 2024.</p> <p>Achieving an 80 % share of the annual plan of supervisions per area.</p> <p>Resolving at least 60 % of all open cases within 60 days.</p>	 <p>375 preventive supervision procedures were completed.</p>  <p>The plans for supervisions per individual listed areas were achieved 100 %.</p>  <p>74 % of cases resolved within 60 days.</p>

Supervision of postal services	Supervision of the execution of the General act on amendments to the general act on exemptions in providing universal postal service.	Preventive supervisions of derogations from delivery time and delivery to home, namely by delivery to a different appropriate location.	Launching at least three supervision procedures by 31 December 2024.		Launching 2 preventive supervision procedures and a system review regarding the exceptions from the provision of the universal service (permissibility of derogations from serving and delivering mail).
	Supervision of the provisions of the General act on the quality of providing universal postal service.	Preventive supervisions of suitability of contractual post offices and the appropriate number of mailboxes with the goal of ensuring a suitable density and organization types of contact points for meeting reasonable needs of postal service users.	Launching at least three supervision procedures of contractual post offices and two procedures of the installation of installed mailboxes by 31 December 2024.		Launching 2 preventive supervisions, and a system review of the installation of mailboxes and 2 preventive supervisions and system review of contractual post offices.
	Supervision of ZPSto-2, the Regulation on cross-border parcel delivery services and of general and individual Agency's acts.	Ensuring compliance of postal service provision with ZPSto-2, the Regulation on cross-border parcel delivery services and of general and individual Agency's acts.	Launching supervision procedure when any breaches are detected.		Conducting several supervisions from reports.
Supervision of railway traffic services	Supervision of adherence to the provisions of the Railway Transport Act in the operation of the PRI manager, the managers of facilities and equipment for providing additional services and the passenger transport carrier.	Ensuring competitive conditions on the market of railway traffic services and the rights of passengers in railway transport.	Launching at least three supervision procedures of the PRI manager, one supervision procedure of the carrier and three supervision procedures of facilities' managers by 31 December 2024.		Completed in accordance with the Agency's Operational Programme.
					Not completed, as the Agency does not yet have the authority of a body for the implementation of the Regulation.
					Two procedures were not yet completed by the end of 2024.

1 SUPERVISION OF ELECTRONIC COMMUNICATIONS

In the field of ensuring electronic communication networks and services, the Agency conducted 163 inspections and 23 misdemeanour proceedings based on ZEKom-2 in 2024. The reason for the deviation from the planned number of supervisions lies in the considerably lower number of reported unsolicited communications. Furthermore, the workload significantly increased due to the complexity of procedures in the area of competition protection and the related increased activity in the scope of the Agency's representation in the handling of issued rulings at the Administrative Court of the Republic of Slovenia. The majority of supervisions concerned the verification of compliance with the legal provisions on direct marketing, i.e. unsolicited communications, the conformity of the content of subscription contracts with legal requirements, the quality of service provision under subscriber agreements, personal data storage, and the misuse of the emergency number.

For 2024, the Agency had planned to carry out systematic supervisions of the implementation of the provisions of ZEKom-2 regarding compliance with the measures imposed by regulatory decisions, with an emphasis on the relevant markets 1 and 3b. However, in the first half of 2024, the competent court returned previously issued supervision decisions for reconsideration, so the Agency prioritised resolving these. As such procedures are the most demanding and require a significant commitment and a large portion of human resources, the Agency did not initiate new supervision procedures related to competition protection in 2024, but they remain at the top of the Agency's priority list.

Supervision procedures related to the protection of end-users were also a high priority in 2024. The Agency devoted a large part of its focus to verifying the transparency of operators' business practices, both in terms of how products are offered to users and the timeliness and adequacy of informing users about potential changes. With the aim of ensuring the highest possible protection for end-users, the Agency carried out systematic supervision of the implementation of the provisions of Article 192 of ZEKom-2. By monitoring potential publications and notifications of changes to contractual terms by operators, the Agency strived, through preventive action and to avoid potential sanctions, to standardise the operators' practices.

Furthermore, the Agency also completed out several supervisions related to the processing of personal data and the protection of the privacy of electronic communications. In 2024, the Agency also paid particular attention to the misuse of the emergency number 112. As the Agency is aware of the importance of the emergency number and the difficulties faced by all those involved in preventing its misuse, it partnered with the Administration of the Republic of Slovenia for Civil Protection and Disaster Relief and organised a workshop for operators with the aim of finding a solution to limit misuse of the most important number for everyone's life – 112.

In the scope of preventive action, the Agency provided obligated parties and end-users with clarifications regarding their rights and obligations. In addition, the Agency also held a workshop with operators aimed at resolving open issues that arose during inspection procedures. The Agency consistently strives to ensure the lawful operation of obligated parties, and its preventive actions are of essential importance in this field. Consequently, in 2024, the Agency carried out a large number of preventive reviews and, within this scope, called on obligated parties to rectify the identified irregularities. According to the Agency's experience, obligated parties are much more receptive to the Agency's opinions than to issued administrative acts, the majority of which end up before the Administrative Court of the Republic of Slovenia, which consequently requires a large commitment of human resources on the part of the Agency. As a large number of obligated parties are not even aware of their obligations, for example in the area of unsolicited communications, the Agency's activities were also aimed at familiarising obligated parties with the legislation.

The Agency continued to consistently supervise the adequacy of security incident reporting and the correctness and timeliness of operators' reporting based on the Agency's questionnaires, as the latter are crucial for monitoring market developments. There were no major issues concerning access to universal service in 2024.

In 2024, the Agency provided answers or opinions to 21 received inquiries from end-users and 7 received inquiries from experts; the inquiries related to various areas of application of ZEKom-2 and the sub-legal acts issued on its basis. The majority of the questions concerned the practical implementation of the provisions on unsolicited communications, the recording of telephone calls, and the safeguarding of the rights of electronic communications users.



Monitoring internet service providers and related user rights

remained one of the Agency's
priority objectives also in 2024.

Security of networks and services is one of the areas that the European Commission, BEREC and ENISA have also placed a lot of attention on. In 2024, the Agency actively focused on this by participating in the preparation of the new Information Security Act and successfully completed the digitalisation of the procedure for operators to report incidents and announced outages, malfunctions, and errors in networks.

The Agency's activities were also focused on carrying out supervisions based on the Accessibility of Products and Services for Persons with Disabilities Act, which is planned for implementation at the end of June 2025, and under which the Agency will be responsible for supervising the implementation of additional conditions regarding electronic communication services.

2 SUPERVISION OF THE RADIO FREQUENCY SPECTRUM

The Agency manages the radio frequency spectrum and supervises it in order to ensure uninterrupted use of radio frequencies. It supervises the radio frequency spectrum systematically on the basis of its annual plans, based on request for launching procedures, and within the scope of investigating reported radio interference. It utilises the remote radio monitoring and measurement system at 12 locations and in 3 special measurements vehicles. If there are any irregularities established, it takes action in accordance with its authority.

The Agency regularly upgrades its measurement equipment, both hardware and software. In 2024, as part of equipment upgrades, the Agency replaced one of its own measurement vehicles with a new one and equipped it for carrying out tasks in the field. The Agency procured new computers and appropriate software for all remote stations and vehicles; because it has issues with device drivers, the distribution of the equipment is planned for 2025. In the scope of systematic radio frequency spectrum supervision, the Agency in 2024 conducted 30 inspections to investigate radio interference and based on reports. In the field of radio frequency interference resulting from electromagnetic compatibility (EMC) the Agency exercised its authority by searching for interference sources from devices and issued measures to remedy them based on its inspection authority. It launched one case in this area.

In 2024 the Agency conducted 39 measurement recordings of the radio (FM) spectrum, 38 measurement recordings of the television (DVB-T) spectrum, and 40 measurement recordings of the spectrum for digital radio (DAB+) at different locations across the territory of RS. It also purchased new computers for all remote stations and vehicles and installed software on them. The distribution of new computers was moved into 2025 because of issues with device drivers. The Agency continued with systematic daily measurements of the radio broadcasting spectrum, as it needs these results for comparing with past measurements.

In 2024 the Agency investigated 28 reports of radio interference. The majority of these cases pertained to interference of mobile operators' transmissions by natural or legal persons using mobile repeaters that were not properly installed or configured, and other devices which were not operating correctly.

The Agency invested a lot of its time also in resolving interference impacting the Slovenian weather radars due to RLAN connections. Through regular measurements it monitored the activities alongside the border, where foreign radio stations continue to cause interference for Slovenian radio stations. The Agency investigates radio interference in the reception of signals of Slovenian radio broadcasting stations and reports them, when it establishes the interference. In 2024, the Agency conducted several measurements of FM broadcasts along the western border and sent 33 new notifications to the Italian administration. The Agency assists radio frequency spectrum users by advising them on how to resolve various technical issues. In 2024, the Agency placed more focus on monitoring the use of the lower VHF band for functional links, where no irregularities were identified.

2.1 MONITORING THE QUALITY OF SERVICE OF BROADBAND NETWORKS

Monitoring internet service providers and related user rights remained one of the Agency's priority objectives also in 2024. The Agency continued looking for and testing suitable hardware that can be used as a probe for autonomo-

us measurements. The Agency continued to successfully collaborate with the two major measurement equipment vendors and also with their research and development departments. This allowed it to gain insight into the latest products and technologies for professional measurements and the opportunity to contribute its requirements to the product development of these manufacturers. In 2024, the Agency tested instruments for measurements on fixed networks that enable measurements of speeds of up to 400 Gbps and the execution of measurements according to the Common Public Radio Interface (CPRI and eCPRI protocol) standard. It also actively collaborated with manufacturers on the improvement and testing of new versions of software for these instruments.

The Agency paid particular attention to verifying the compliance of operators with the Telecoms Single Market (TSM) Regulation. The Agency is a member of the Regional Internet Registry for Europe, the Middle East and Central Asia (RIPE NCC) and holds the role of Local Internet Registry (LIR), and the AKOS Test Net measurement system connects to the internet via its own IPv4 and IPv6 addresses. To ensure uninterrupted operation, the Agency provided adequate capacity of connections to the internet exchange point and the transit service provider. In 2024, the Agency replaced all existing servers that are part of the AKOS Test Net measurement system with new ones, thereby increasing reliability and performance. The Agency continued developing the AKOS Test Net measurement system to be as compatible as possible with the tools of other national regulatory authorities. Therefore, it modified, upgraded, updated, and unified the source code of the AKOS Test Net measurement system so that it is now fundamentally the same as the software code of the Austrian national regulatory authority (RTR). The AKOS Test Net mobile applications were also upgraded and updated and unified with the RTR code. This provided additional features and operational reliability of the AKOS Test Net measurement system. All the activities carried out will enable further joint cooperation on the development of new and more advanced software code and improve the reliability and accuracy of the measurement system. In addition to the above, this will reduce the cost of development and maintenance of the AKOS Test Net measurement system in the future. In 2024, more than 1,000,000 measurements were carried out with the AKOS Test Net measurement system on various connections.

The Agency continued upgrading the AKOS Test Net system, making it a comprehensive solution for monitoring and measurement for all types of broadband connections. It continued with the development of software (client) that end-users can install on their personal computers to perform measurements. This will increase the accuracy of measurements, as there will be no limitations of web browsers, and additional parameters influencing measurement accuracy can be obtained. The Agency developed clients for the Windows, MacOS, and Linux operating systems. Agency employees and the wider public contributed data to the database with measurements, improving the quality of the database with a larger volume of measurements.

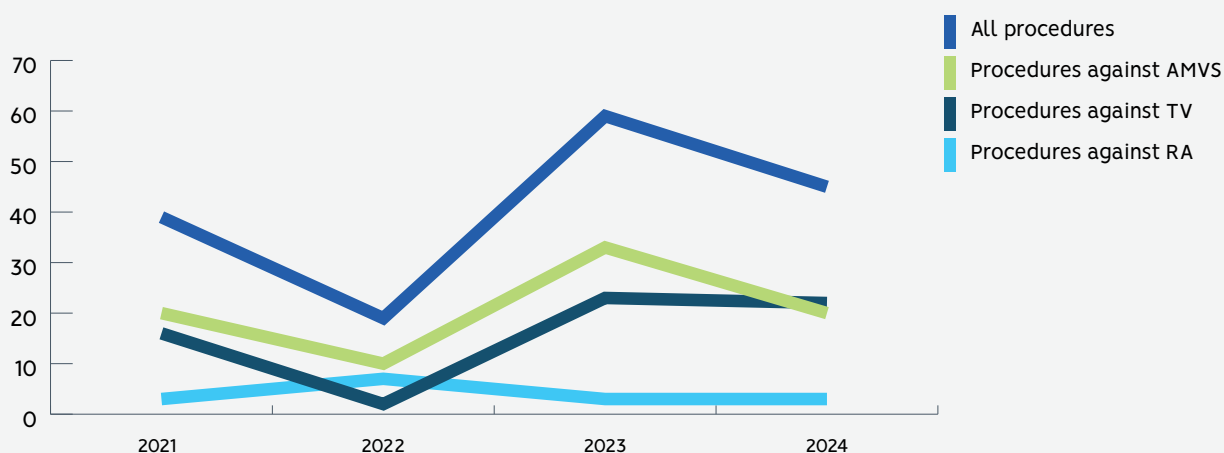
3 SUPERVISION OF ELECTRONIC MEDIA

In 2024 the Agency's supervisory procedures in electronic media met the set goals and tasks across in all areas, where it had activities planned: shares of European and Slovenian audiovisual works and their promotion in on-demand audiovisual media services, scope and transparency of television advertising, stations of special importance, protection of children and minors from potentially harmful audiovisual content, and protection of users of video sharing platforms and accessibility to audiovisual media services for disabled persons. It also conducted some unplanned activities in other areas under its authority.

With the objective of protecting the rights and protection of TV viewers, radio listeners and users of on-demand audiovisual media services and video sharing platforms, the Agency's actions were proactive and aimed at prevention. This ensured the lawful operation of stakeholders in the market and the achievement of public cultural goals in electronic media, in accordance with the planned tasks.

To this end, the Agency carried out 375 inspections supervisions in 2024, of which 168 related to the scope of advertising on TV channels. It carried out 94 inspections related to accessibility improvement plans, 45 related to reports on achieved shares of audiovisual (AV) works, 33 related to product placement and sponsorship, and 20 to the protection of children from potentially harmful content. It conducted 15 inspections in other areas.

FIGURE 15: COMPLETED INSPECTION PROCEDURES BY SERVICES



In 2024 the Agency launched 53 supervisory procedures. In 45 cases these were inspection administrative procedures, and in eight a minor offence procedures. It completed 45 procedures. Of these, 22 were against television channel publishers, 3 against radio station publishers, and 20 against the publishers of on-demand audiovisual media services. In the scope of all inspection procedures it issued 13 improvement notices, and in minor offence procedures 6 decisions with a warning.

As part of the planned collection of annual reports on the achieved shares of audiovisual works, the Agency received reports for all 18 television stations that were required to report on the achieved shares of audiovisual works for the year 2023 within the deadline. On the other hand, it received adequate reports within the deadline for only 12 out of 27 on-demand audiovisual media services, and after launching 15 inspection procedures, it obtained all the missing reports except for one, in which it issued an improvement notice. Due to non-compliance with this notice, it launched a minor offence procedure and issued a warning. The Agency also initiated an inspection of an AVMS provider due to its failure to reach the prescribed 5 % share of Slovenian audiovisual works. Following a positive opinion from the relevant ministry regarding the objective reasons for non-compliance, the procedure was terminated by a decision.

In addition to achieving the required shares, AVMS providers must also ensure the promotion of European and Slovenian audiovisual works. The Agency's analyses of catalogues found that these works were appropriately placed and promoted, and therefore no supervision procedures were necessary.

In television advertising, the Agency handled five complaints regarding the volume of advertising and conducted 12 analyses of the volume of advertising on 41 Slovenian and foreign TV channels. For Slovenian channels, it initiated two minor offence procedures due to suspected violations, one of which was concluded with a warning.

Sponsorship and product placement are an increasing challenge, so the Agency conducted two analyses of 33 Slovenian-produced television shows, which, together with three handled complaints, led to four procedures for surreptitious advertising and two for incorrect product placement. All were concluded by improvement notices, except for one concerning surreptitious advertising, which was still ongoing at the end of 2024. In addition, it concluded two inspection procedures regarding surreptitious advertising from the period before 2024 and issued improvement notices. Because of breaches identified in these inspection procedures, the Agency conducted four minor offence procedures for surreptitious advertising and issued warnings to the offenders.

In four inspection procedures concerning holders of the status of a local radio programme of special importance, the Agency found that one of the broadcasters did not ensure sufficient diversity of content and therefore issued an improvement notice.

In relation to protecting children from harmful content, the Agency analysed 20 on-demand audiovisual media

services and found that 14 did not contain the protective measures required for potentially harmful content. In four cases, the prescribed protective measures were observed, while in one case they were not, so the Agency initiated a supervision, during which the provider introduced appropriate measures for the protection of children.

In 2024, no video-sharing platform (as defined by ZAVMS) was notified in Slovenia, and therefore the Agency did not carry out any supervision of measures for the protection of users of video-sharing platforms.

The Agency called on providers of audiovisual media services to submit accessibility improvement plans for persons with disabilities for the 2025–2027 period and initiated two supervision procedures against providers who did not submit adequate plans, but did so during the procedure.

The Agency also handled a complaint regarding the inaccessibility of an informative contribution to persons with disabilities and, in this regard, began preparing recommendations for obligated parties to improve accessibility.

In 2024, the Agency also carried out several ex officio inspections or based on complaints that did not fall under the aforementioned areas where supervision activities were planned. Two inspection procedures pertained to the public's right to follow important events, one of which was concluded with the issuance of an improvement notice aimed at ensuring the accessibility of events from the list of important events in such a way that they are available for viewing to at least 75% of the population of Slovenia in TV channel bundles that are available without additional charge to all television subscribers of an individual electronic communications operator. In relation with this, the Agency also handled two complaints, which did not lead to a procedure.

The Agency also investigated a complaint regarding the broadcasting of inappropriate targeted advertisements for alcoholic and energy drinks before children's content during time-shifted viewing and found that it was a content labelling error in the operator's system, which the operator rectified during the procedure.



The Agency initiated an inspection procedure against one of the operators due to the suspicion that it was offering on-demand audiovisual media services on its platform that had not been notified to the Agency in accordance with ZAVMS. After the issuance of an improvement notice, the operator notified the offered video libraries as one on-demand audiovisual media service.

Based on a complaint regarding the inappropriate interruption of a sports broadcast with advertisements, the Agency issued a regulatory decision to the obligated party, as the method of advertising with inappropriately implemented partial screen advertising interfered with the substantive integrity of the sports event broadcast itself.

The Agency also handled a complaint regarding alleged irregularities in the publication of mandatory information in a television show and found that no violations had occurred, as the conditions under Article 7 of ZAVMS, which stipulates the publication of mandatory information, were met during the broadcast of the programme.

Based on the received plans, the Agency sent requests for additional clarification to obligated parties regarding four services by the end of 2024 and initiated 2 inspection procedures, as they did not plan to provide any accessibility options in their services, and therefore no improvement in the accessibility of their services for persons with disabilities in accordance with the provisions of ZAVMS. During the inspection supervision procedure, the Agency received adequately completed accessibility improvement plans for the 2025–2027 period from both obligated parties.

4 SUPERVISION OF DIGITAL SERVICES

In 2024, the Agency did not conduct any inspection or minor offence procedures in the field of digital services. The Digital Services Act (DSA) became binding for most providers of digital intermediary services on 17 February 2024. Considering that there are no providers of very large online platforms and search engines (VLOPS) in Slovenia, the scope of obligations under the DSA for the vast majority of obligated parties is relatively narrow, and the Agency assesses that Slovenian obligated parties generally ensure compliance with the provisions of the DSA. These obligations mainly relate to the provision of points of contact and, in the case of hosting service providers, the provision of mechanisms for reporting illegal content.

In 2024, the Agency primarily focused on identifying providers of digital services, especially providers of online platforms that are not small or micro enterprises, and on raising awareness about the obligations arising from the DSA for them, as these providers are subject to the greatest scope of obligations. The Agency also called on these providers to ensure compliance with the provisions of the DSA as soon as possible, with an emphasis on inclusion in the publicly accessible machine-readable database managed by the EC, as stipulated in Article 24 of the DSA.

5 SUPERVISION OF POSTAL SERVICES

In the scope of supervising the postal services market and in line with the set goals, the Agency conducted preventive supervisions according to determined priorities, and based on findings in regulative procedures or reports. In 2024, the Agency reduced the number of preventive reviews because of a systematic review of the sector's operation. The Agency conducted 2 preventive supervision procedures regarding the provision of the universal service in accordance with the Postal Service Act and the General act on exceptions in the implementation of the universal service, and verified the permissibility of derogations from serving and delivering mail in certain geographic areas. The Agency planned and completed 4 preventive supervisions over the adherence to the General act on the quality of universal service provision, and 11 inspection supervisions based on initiative and reports from postal service users.

6 SUPERVISION OF RAILWAY SERVICES

In 2024, the Agency concluded two inspection supervisions that had commenced the previous year. In the first supervision procedure regarding the conduct of the public railway infrastructure manager in connection with the alleged unjustified stopping of a train of a railway transport carrier and, in this regard, with the respect of the carrier's right to access the PRI in Slovenia under fair, non-discriminatory, and transparent conditions, the Agency

found that the carrier was not discriminated against. At the same time, it found that there was insufficient co-operation between the PRI manager and the maritime terminal operator. In the supervision procedure of the PRI manager and the maritime terminal operator, the Agency found that the cooperation between the stakeholders was inadequate and imposed measures to improve cooperation.

In the second supervision procedure of the manager of the railway service facility in the Port of Koper, the Agency investigated whether the maritime terminal operator ensures non-discriminatory access for railway transport carriers to the facilities, including access to railway tracks and services performed in these facilities, with the Agency focusing on car terminals. The Agency did not find any irregularities in the procedure, and therefore the supervision procedure was terminated by a decision.

In 2024, the Agency conducted three supervision procedures related to the determination of non-discriminatory access to infrastructure, including two procedures for monitoring the allocation of ad-hoc train slots and one procedure related to the supervision of the implementation of the PRI manager's notification regarding the allocation of track capacity at the Koper-tovorna station.

Similarly, in relation to systematic inspections, the Agency initiated an inspection supervision procedure against the manager of intermodal freight terminals regarding the provision of services in these terminals to other, competing transport carriers. The procedure is not yet completed and will continue in 2025.

Additionally, the Agency conducted two administrative procedures related to monitoring competitive conditions in the market. In the first procedure for monitoring competitive conditions in the market, the Agency investigated potential discriminatory conduct in the provision of additional railway services at the Dobova station. The Agency did not find any irregularities that would lead to discriminatory conduct and therefore issued a decision to terminate the procedure.

In the second procedure for monitoring competitive conditions in the market, the Agency initiated an ex officio procedure to determine the compliance of the usage fee. The PRI manager adequately explained the changes in the methodology and the reasons for not changing the price items. Based on these findings, the Agency decided to terminate the procedure, as no irregularities or non-compliance with legislation were found.

Based on the findings in one of the supervision procedures against the PRI manager, the Agency found that the manager did not fully comply with the measures prescribed by its act, namely measures to improve the organisation of freight train traffic. Based on the Minor Offences Act, the Agency issued a written warning.

7 OTHER SUPERVISIONS WITHIN THE AGENCY'S COMPETENCE

In November 2024, the Agency was also awarded the competence to supervise the implementation of Regulation (EU) 2021/784 of the European Parliament and of the Council of 29 April 2021 on addressing the dissemination of terrorist content online. By the end of 2024, the Agency had not detected any potential violations or exposure of hosting service providers to terrorist content.

X DISPUTE RESOLUTION

1 USER DISPUTES RELATED TO ELECTRONIC COMMUNICATIONS

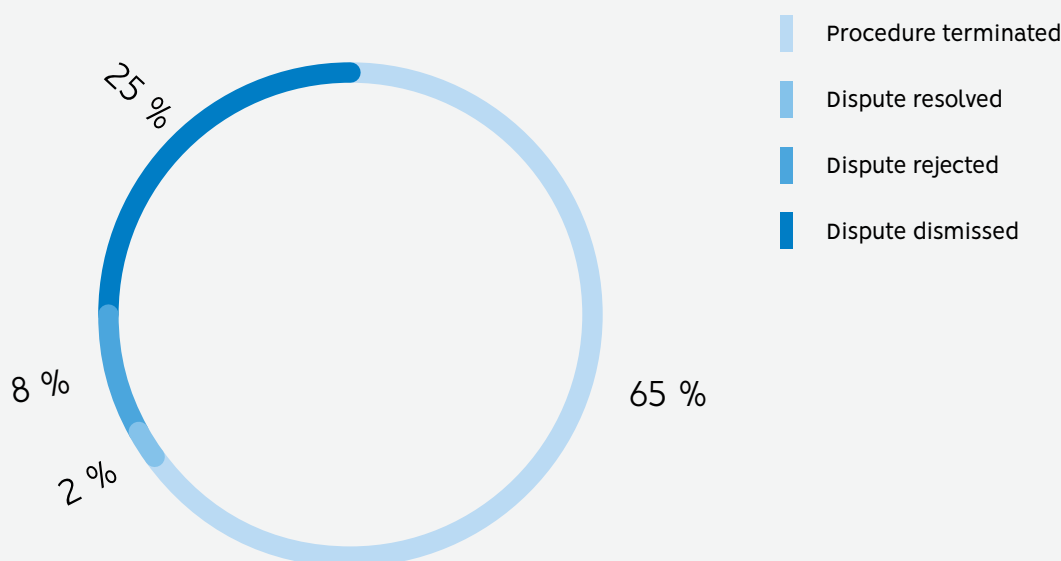
The Agency resolves user disputes in electronic communications that are related to disputes between end-users and operators regarding the rights and obligations specified by ZEKom-2, regulations issued on its basis, and the rights and obligations from subscription contracts. In 2024, the Agency received 605 user disputes for resolution in the field of electronic communications. At the same time, the Agency continued to resolve the 142 disputes transferred from 2023, and two user disputes returned to the Agency for reconsideration by the Administrative Court of the Republic of Slovenia in that year. The Agency worked on a total of 749 user disputes related to electronic communications in 2024.

The number of new cases was somewhat smaller than in 2023, when the Agency handled a large number of disputes filed by groups of individuals experiencing similar issues in specific geographical areas. Even though, the number of new disputes received by the Agency surpassed the average from the 2019–2022 period.

In the field of electronic communications the Agency resolved a total of 599 user disputes in 2024, including two cases returned to the Agency for reconsideration by the Administrative Court of the Republic of Slovenia. 88% of the disputes were resolved within the instructional deadline of 4 months. The Agency will continue to resolve the remaining 150 disputes in 2025.

In 390 cases, i.e. 65% of all resolved cases, the Agency terminated the dispute resolution procedure. This occurred because the parties settled in the mediation procedure, because the initiator of the procedure did not wish to continue, or because the case was referred to another competent authority. The Agency resolved the dispute with an administrative decision in 57 cases. Of these, the Agency upheld the end-user's proposal in 9 cases (approximately 1.5% of all resolved cases) and rejected the proposal in 48 cases (approximately 8% of all resolved cases). In 152 cases (25% of all resolved cases), the Agency dismissed the proposal for dispute resolution because the matter was not within its competence or because the proposal was incomplete and the initiator did not rectify the deficiencies within the specified period.

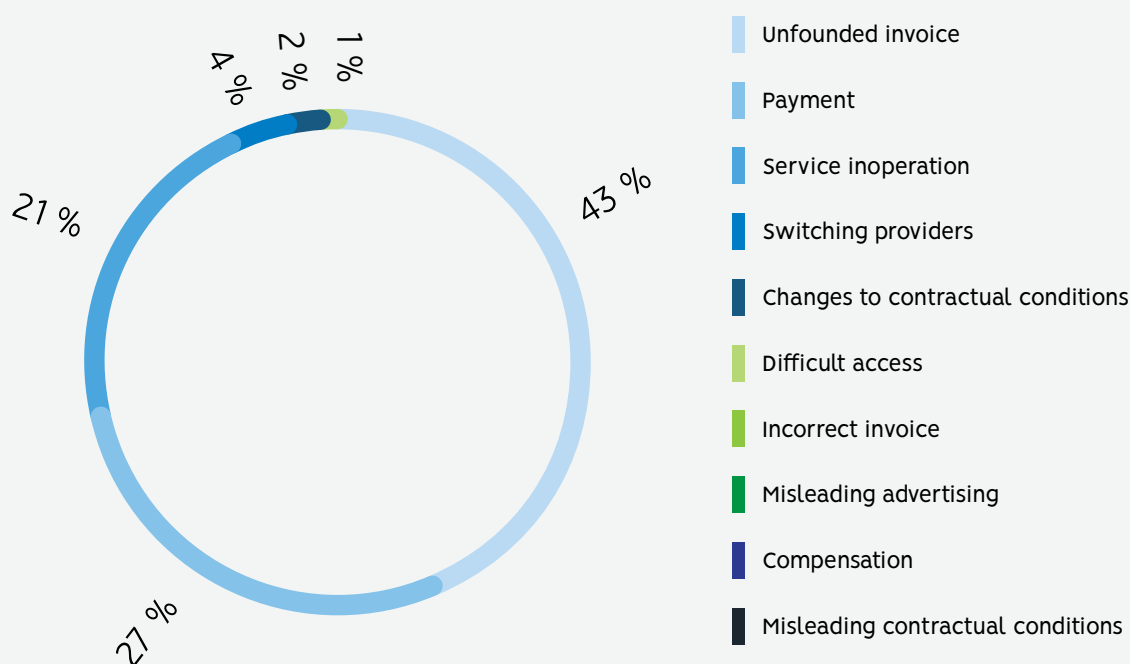
FIGURE 16: USER DISPUTES IN TERMS OF HOW THEY WERE RESOLVED



By type of service that caused the dispute between the end user and the electronic communications provider, in 2024 most disputes were once again related either to broadband services (52%) or to mobile telephone services (40%). These represented 92% of all received disputes, which is comparable to previous years. A minimal share were disputes related to television services (5%), communication services (2%), and fixed telephone services (1%).

Regarding the subject of the dispute, in 2024, disputes due to unfounded invoices (43%) and disputes related to the payment of services, in which users objected to the payment of contractual penalties or costs associated with the termination of the subscription contract (27%), and disputes related to the non-functioning or poorly functioning services (21%) predominated. The share of disputes related to switching providers stood at 4 %, and the share of disputes related to changes to contractual terms and conditions stood at 2 %. The shares of remaining cases were at 1 % or below.

FIGURE 17: RECEIVED CASES BY SUBJECT OF USER DISPUTE



2 USER DISPUTES RELATED TO AUDIOVISUAL MEDIA SERVICES

The Agency did not receive any proposal for resolving a dispute between users and providers of video sharing platforms.

Regarding the accessibility of audiovisual media services for persons with sensory disabilities, the Agency handled 2 complaints. In one case, it was a complaint from a user against a television station publisher and an operator because the subtitles for the deaf and hard of hearing did not function in Slovenian-language content. As ZAVMS does not specify a minimum threshold for the time volume or programme content in which providers should ensure these services, the Agency did not initiate proceedings. In the second case, a complaint from an organisation representing persons with disabilities was handled, specifically regarding the accessibility of a contribution that related to irregularities in the management of a disability organisation. Within the scope of this procedure, the Agency prepared guidelines and recommendations, in which it provided some guidance on improving the accessibility of its services.

3 USER COMPLAINTS RELATED TO VIOLATIONS OF THE DIGITAL SERVICES ACT

In 2024, the Agency received seven user complaints regarding potential violations of the obligations of intermediary service providers arising from the Digital Services Act (DSA). Article 53 of the DSA foresees the lodging of complaints against all intermediary service providers within the EU. All complaints were handled without delay, and in six cases it was found that there was no violation of DSA obligations, which was explained in detail to the complainants. In one of these cases, the Agency detected a suspicion of a criminal offence and therefore referred the matter to the police for resolution. In one case, it was found that there was a suspicion of a violation of the provisions of the DSA, involving a provider established in another member state of the EU, so the Agency referred the matter to the competent Digital Services Coordinator for resolution. By the end of 2024, the decision of this DSC had not yet been received.

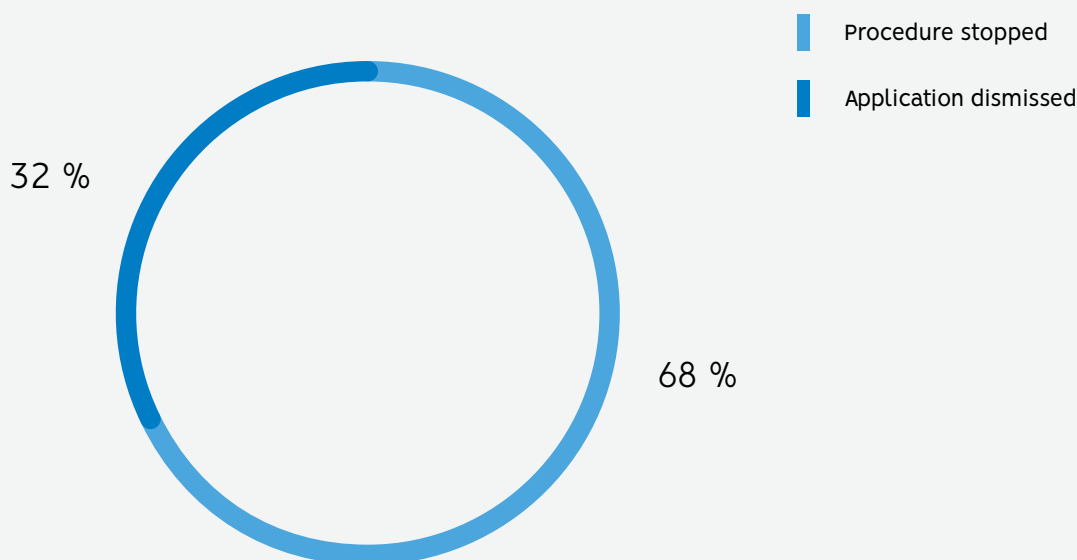
4 USER DISPUTES RELATED TO POSTAL SERVICES

The Agency resolves disputes between users of postal services and service providers. In 2024, the Agency received 29 requests for dispute resolution, which is above the average for the previous years, when it stood at about 20 per year. The exception were the years 2021 and 2022, when the number of disputes rose to approximately 40.

The Agency also continued to resolve the 17 disputes brought over from the previous year to 2024. In 2024, the Agency handled a total of 46 disputes between users of postal services and service providers.

During this period, the Agency resolved a total of 22 disputes, and it will continue to address the remaining disputes in 2025. Users contacted the Agency mostly regarding the compensation due to lost mail shipments.

FIGURE 18: DISPUTES WITH POSTAL SERVICE PROVIDERS IN TERMS OF HOW THEY WERE RESOLVED



5 PASSENGER COMPLAINTS IN RAILWAY TRAFFIC

In 2024, the Agency received 16 complaints for resolution, of which 13 were submitted at the request of passengers, and three complaints were received by the Agency for resolution from the Market Inspectorate of the Republic of Slovenia.

Out of all 16 complaints, only two related to the Agency's competence for resolving passenger complaints, in accordance with the Regulation on the implementation of Regulation (EC) No 1371/2007 of the European Parliament and of the Council on the rights and obligations of passengers in railway transport. Both complaints were resolved by the Agency within the prescribed deadline. In one procedure, a decision on termination was issued because the carrier and passengers reached an agreement through the Agency's mediation, and in the other procedure, a decision was issued upholding the complaints of all six passengers.

In other cases, the Agency found that they did not fall within its competence, as the complaints related to the quality of services or disturbance of peace on the train, a request for clarification regarding replacement bus services, illegal crossing of tracks, inadequacy of the train timetable, or the method of selling train tickets. The Agency forwarded these complaints to the competent authorities for further resolution, such as the Market Inspectorate of the Republic of Slovenia, the Public Passenger Transport Management Company, or the Inspectorate of the Republic of Slovenia for Infrastructure. In the case where the complainant requested a refund for a ticket, the Agency provided an explanation regarding the possibility and method of submitting a complaint to the carrier, as the deadline for the carrier to provide a response had not yet expired.

The Agency also concluded two passenger complaints, which were filed at the end of 2023, within the deadline stipulated in the Regulation. In both procedures, a decision was issued partially upholding the complainants' claims.

6 OPERATOR DISPUTES IN ELECTRONIC COMMUNICATIONS

In accordance with item 1 of paragraph 1 of Article 282 of ZEKom-2, the Agency resolves carrier disputes between natural persons and legal entities providing electronic communication networks and/or services, and between providers of accompanying capacities, if disputes are related to rights and existing obligations as determined by ZEKom-2, and regulations, as well as general and individual acts issued based on it.

In 2024, the Agency received a total of 4 carrier disputes for resolution. The number of new cases decreased slightly compared to previous periods but is comparable to the period from 2019 to 2021. No carrier dispute was returned to the Agency for reconsideration by the Administrative or Supreme Court of the Republic of Slovenia, as the operator's appeal was rejected in the adjudicated case, and the Agency's decision was consequently upheld.

Of the received cases, 3 disputes related to shared construction, and one related to the price of access to physical infrastructure. In addition to these four disputes, the Agency continued to handle four disputes in 2024 that it had received in previous years. The dispute resolution procedure in five cases (related to access to existing physical infrastructure) was suspended in accordance with paragraph 8 of Article 283 of ZEKom-2 pending the final decision of the District Court.

In 2024, the Agency resolved four carrier disputes. In three cases, the Agency terminated the procedure with a decision, as one case involved a dispute regarding the price and other conditions of cooling and electricity supply services at shared locations. The remaining two cases related to shared construction. In one case, which concerned access to building infrastructure in multi-apartment units, the request was partially granted.

7 DISPUTES BETWEEN PROVIDERS OF POSTAL SERVICES

The Agency did not receive any proposal for resolving a dispute between postal service providers in 2024.

XI CARE FOR END USERS

In 2024, the Agency continued its activities to raise awareness among end-users. It cooperated with the relevant consumer protection authorities and consumer organisations, responded to user inquiries through its call centre and written clarifications, and published information on legislative changes on its website. In addition, it provided useful information through other portals intended for end users, as described in previous chapters.

1 CONSULTATIONS WITH OPERATORS AND CONSUMER ORGANIZATIONS AND COOPERATION WITH OTHER BODIES IN CONSUMER PROTECTION

ZEKom-2 introduced the »one-stop-shop« operator switching mechanism, where the new service provider handles the operator switching process in cooperation with the previous provider. The Agency noted that this system causes numerous problems in practice. Therefore, following a simultaneous initiative by operators, the Agency participated in several meetings and workshops in 2024 aimed at establishing an effective system for switching internet access service providers. The goal of these activities is to establish a functional and simple switching system that will be efficient for both providers and end users. The Agency established that an amendment to the General act on number portability and internet access service provider switching is necessary to achieve this goal and has already begun revising it. As this is a complex issue, the Agency will continue with this project in 2025.

In order to raise awareness among end users, the Agency also prepared a brochure entitled »Withdrawal from an Agreement in Practice«, the purpose of which is to empower users regarding their rights to withdraw from a subscriber agreement, particularly regarding the possibilities of free withdrawal, the consequences of early termination, and a warning about potential costs. The Agency wanted to collect all key information about the cost consequences of withdrawing from an agreement in a clear and simple way. This information is scattered in several places in the legislation, which is often unclear and impractical for users. The purpose of the brochure is to make it possible for users to find everything they need in one place for a better understanding of their rights and obligations. The brochure is available in electronic format on the Agency's website. In addition, the Agency also updated the most frequently asked questions and answers on its website in order to empower end users regarding their rights and obligations.

The Agency also participated with the Market Inspector of the Republic of Slovenia (TIRS). In the field of electronic communications, it provided data on user disputes resolved concerning specific issues and individual operators. The Agency also forwarded proposals to TIRS about the user-related topics that TIRS should put additional focus on in 2025.

The Agency continued collaborating in the network of public bodies for cross-border consumer protection (Consumer Protection Cooperation – CPC), which was established by Regulation (EU) 2017/2394. In 2024, the Agency again managed to process all the notifications it received through the internal market information system (IMI) from partner bodies from other EU member states, while the Agency did not give any initiatives.

2 PORTAL FOR ACCESSING OPERATORS' OFFERS

The Agency has been constantly striving to provide as much useful information as possible that can help end users when comparing current retail offers from operators. For this purpose it runs and administers several websites, as described in the previous chapters of the 2024 Annual Report. At the same time the Agency continued in 2024 to host and update the portal for comparing operators' offers. On the »primerjajoperaterje.si« portal, data on available subscription plans is published by the operators themselves, which allows users to more easily compare and

choose the most suitable provider or offer. In 2024, in addition to the regular maintenance of the portal, an update of the search filters was carried out. Within the scope of the content implementation of this task, the Agency regularly reviewed the current offers of operators and called on them to provide up-to-date information.

3 CALL CENTRE

The Agency has a call centre for user support, available at the toll-free number 080 2735, which operates every Monday, Wednesday and Friday between 9:00 and 11:00. By calling this number, end users can obtain basic information regarding electronic communications and postal services and instructions on entering the proposal for dispute resolution. In total, the Agency received 476 calls in 2024, which represents a significant increase compared to 2023, when there were 385 calls. All calls were answered appropriately.

4 CLARIFICATIONS TO END USERS

Besides the above activities the Agency also responds to questions from users or provides them with information relating to the field of its operations.


In 2024 the Agency received 246 different questions from end users for the clarification of a given situation, or for advice about a given problem in relation to electronic communications and postal services. The Agency prepared 239 written explanations and answers; of these 96% were drafted within the recommended deadline of 15 days.

In relation to resolving complaints from passengers in railway transport, the Agency finds that passengers are often not sufficiently informed about the rights and obligations related to Regulation (EU) 2021/782 of the European Parliament and of the Council of 29 April 2021 on the rights and obligations of passengers in railway transport. Passengers contact the Agency to file a complaint or even with a direct request for reimbursement of costs before complaining to the carrier. An additional reason for this is also the dispersion of responsibility among different institutions, as the competencies related to ensuring efficient railway passenger transport are distributed among various authorities:

- | Ministry of the Environment, Climate and Energy;
- | Public Passenger Transport Management Company (DUJPP);
- | Ministry of Infrastructure, as the body for implementing this Regulation;
- | the Agency as the body for resolving user complaints arising from this Regulation;
- | Transport Inspectorate, and
- | Market Inspector of the Republic of Slovenia.

Similarly, the Inspectorate of the Republic of Slovenia for Infrastructure, where railway transport inspectors operate (and who were competent for the supervision of the Regulation based on the Decree on the Implementation of the Regulation (EC) on the Rights and Obligations of Rail Passengers), declared itself not competent as a supervisory authority.

Consequently, the Agency informs passengers about their rights, obligations, as well as the methods and options for complaints on its website, via telephone, through social media, and via email. Additionally, in 2024, the Agency provided 12 clarifications to passengers regarding specific cases concerning the possibility and method of filing a complaint.



The Agency has been
constantly striving
to provide as much
useful information
as possible

that can help end users when
comparing current retail offers
from operators.

XII LEGISLATIVE AND JUDICIAL PROCEDURES

FIGURE 19: XII LEGISLATIVE AND JUDICIAL PROCEDURES

KEY OBJECTIVE: ENCOURAGING COMPETITION AND MARKET DEVELOPMENT					
Task/Project	Activities	Objectives	KPI	Result	Comment
Preparing the Agency's general acts based on ZAvMS and ZMed	Participation in the working group at the Ministry of Culture and adopting the Agency's general acts.	Amendment to ZMed.	Participation in the working group at the Ministry of Culture and preparing the general acts before the deadline.	<div></div>	The Agency participated in a working group and drafted general acts based on the proposal of the new ZMed-1, which was submitted for adoption to the National Assembly of the Republic of Slovenia.
Amending the General act on the frequency utilization plan (NURF).	Preparing the amended NURF.	Amending the NURF in accordance with the new EU and CEPT regulations, and the WRC-23 resolutions.	Publishing the amended NURF by 31 December 2024.	<div></div>	The Agency amended NURF and published it in 2024.

1 REPRESENTING THE AGENCY BEFORE THE COURTS

In accordance with current legislation, parties to the procedure have the right to judicial protection in administrative disputes before the Administrative Court of the Republic of Slovenia against final decisions of the Agency. The Administrative Court decides at the first instance, while the Supreme Court of the Republic of Slovenia decides on appeals or revisions against decisions of the Administrative Court at the second instance. The Agency represents itself in administrative disputes, and in other judicial procedures it obtains legal representation when needed.

In 2024, the Agency received a total of 17 lawsuits from the Administrative Court of the Republic of Slovenia challenging its final decisions and rulings. Additionally, it received one motion for interim injunctions. Compared to 2023, there was a slight decrease in the number of new cases.

In 2024, the Administrative Court of the Republic of Slovenia ruled on 35 administrative disputes. It dismissed 14 lawsuits, and affirmed the Agency's decision. It also granted relief to 9 lawsuits (one of them only partly), and remanded all the cases except one, where it found the disputed decision to be illegal, back to the Agency for reconsideration. In addition, it dismissed two lawsuits and terminated 9 administrative disputes by decision, in most cases because the plaintiff withdrew the lawsuit against the Agency's decision. In 2024, one of an administrative dispute was concluded with a judicial settlement. Furthermore, the court also ruled on one motion for the issuance of a temporary injunction, rejecting it.

In 2024, one request for review and one appeal were filed with the Supreme Court of the Republic of Slovenia against the decisions of the Administrative Court of the Republic of Slovenia. The request for review law was filed

against a decision regarding a postal user dispute concerning the interpretation of substantive law, and the appeal was filed against the decision of the Administrative Court of the Republic of Slovenia rejecting a request for intervention in court proceedings, access to court files, and the joinder of administrative disputes.

In 2024, the Agency also filed one request for review, on which the Supreme Court of the Republic of Slovenia has not yet ruled. In 2024, this court also did not rule on any other requests for review filed in that or previous years. However, it did issue a decision in 2024 to suspend the procedure for resolving an appeal filed in 2023 against the decision of the Administrative Court of the Republic of Slovenia to dismiss a request for review, because a preliminary ruling procedure is pending before the Court of Justice of the EU regarding a similar issue.

The aforementioned data shows that 25 administrative disputes were concluded in favour of the Agency in 2024 (including dismissals of lawsuits and terminations of procedures), and one judicial settlement was reached. Given the total of 35 resolved administrative disputes, this represents a success rate of 74.3%. This exceeded the target of at least 70% of the challenged decisions of the Agency successfully passing judicial review.

In addition to the aforementioned procedures, the Agency may also be involved as a party in disputes before the courts, such as labour law or civil law disputes regarding property and other claims. In 2024, an appeal procedure was still pending before the higher court regarding the decision of the district court, which in November 2023 rejected a multi-million euro claim for damages against the Agency for alleged damage caused during the procedure for awarding radio frequencies for LTE.

In 2024, the Agency also continued its activities regarding the long-standing issue of interference with the radio frequency spectrum of Slovenia along the border with Italy and the related court proceedings between Slovenian and Italian radio broadcasters. Despite being private law disputes in which the Agency is usually not directly involved, as the administrator of the Slovenian radio frequency spectrum, it has an interest in resolving these disputes in favour of Slovenian broadcasters. To this end, the Agency collaborates with the State Attorney's Office of the Republic of Slovenia and relevant ministries by providing input in legal proceedings and procedures for the adoption of preliminary rulings by the Court of Justice of the European Union.

2 NORMATIVE ACTIVITY

At the beginning of 2024, the Act on the Implementation of the Regulation (EU) on a Single Market for Digital Services (ZIUETDS) was adopted, assigning the Agency the role of Digital Services Coordinator and thus the supervisory authority for the implementation of the Digital Services Act (DSA). Due to the new competences, the Government of the Republic of Slovenia also adopted amendments to the Decree on the Establishment of the Agency, and the Agency prepared and adopted a new Articles of Association of the Agency for Communication Networks and Services of the Republic of Slovenia.

The Agency was involved in the preparation of the proposal for the Act on the Implementation of Regulation (EU) on addressing the dissemination of terrorist content online, which was prepared by the Ministry of Digital Transformation (MDP). The proposal assigns the Agency tasks of determining the exposure of hosting service providers to terrorist content and supervising the implementation of Regulation 2021/784/EU. These tasks fall within the area of security and crime prevention, and therefore, during the preparation of this draft Act, the Agency opposed taking them over, especially regarding the determination of exposure to terrorist content. Nevertheless, the legislator assigned this competence to the Agency in the Act on the Implementation of Regulation (EU) on addressing the dissemination of terrorist content online.

In the field of media legislation reform, the Agency was also active in 2024 in the working group of the Ministry of Culture for the preparation of the new ZMed-1, as described in Chapter 2.2.7. Within this framework, the Agency prepared drafts of general acts that are required according to the current text of ZMed-1. The Agency will also cooperate with the relevant ministry in 2025 within the legislative procedure, if necessary.

At the beginning of 2024, EU Regulation 2024/900 on the transparency and targeting of political advertising was

also adopted. As the Agency is expected to gain new supervisory powers in this area regarding political advertising in the media field, it was also involved in the preparation of the draft law on the implementation of this regulation, which is being prepared by the Ministry of Public Administration. In this regard, the Agency provided opinions on the demarcation of related competences between the Agency and other bodies and commented on some other practical aspects of the regulation's implementation.

In 2024, the Agency was also further involved in the process of amending the Railway Transport Act, within which it contributed its views on the method of financing the regulatory body and submitted proposals for provisions relating to the new competences that the amendment is expected to assign to the Agency. It was also involved in the preparation of positions in the process of adopting the Regulation of the European Parliament and of the Council on the use of railway infrastructure capacity in the single European railway area, amending Directive 2012/34/EU and repealing Regulation (EU) No 913/2010.

In 2024, the Agency ensured that the executive acts for whose adoption it is responsible are consistent with the applicable legislation and follow market changes. Consequently, it issued and published the following general acts in the Official Gazette of the Republic of Slovenia in 2024:

- | General act amending the General act on the quality of universal service (Official Gazette of the Republic of Slovenia, No. 108/24)
- | General act amending the General act on the method of calculating payments for the use of radio frequencies (Official Gazette of the Republic of Slovenia, No. 103/24)
- | General act amending the General act on the radio frequency utilization plan (Official Gazette of the Republic of Slovenia, No. 67/24)
- | General act amending the General act on the radio frequency utilization plan (Official Gazette of the Republic of Slovenia, No. 103/24)
- | General act amending the General act on monitoring and controlling the use services (Official Gazette of the RS, no. 13/24)
- | General act amending the General act on the quality emergency communication services (Official Gazette of RS, no. 9/24)
- | General act amending and supplementing the General act on the itemised invoice (Official Gazette of the Republic of Slovenia, No. 15/24)

At the end of 2024, the Agency also prepared a draft Recommendation on changes in the prices of universal postal service, which it adopted in the first week of January of the following year. During the year, it also prepared a draft Recommendation on proper actions to be taken by operators with unfounded or unreasonable requirements for operator access and submitted it for public consultation.



XIII THE AGENCY'S INTERNATIONAL ACTIVITIES

1 THE AGENCY'S ACTIVITIES IN INTERNATIONAL ASSOCIATIONS AND ORGANISATIONS

1.1 INTERNATIONAL COORDINATION AND INTERNATIONAL ACTIVITIES FOR EFFICIENT RADIO SPECTRUM UTILISATION

Along with regular participation in 32 working groups in the scope of the European Union (RSPG, BEREC, RSC, TCAM), as well as NATO, CEPT, ITU and HCM, the Agency coordinated the use of radio frequencies that affect other countries.

As part of the »Good Office« working group at the RSPG and at ITU meetings, the Agency carried out activities to protect the Slovenian radio frequency spectrum from interference from Italy. Within the Adriatic-Ionian Initiative group of countries, it participated in the preparation of an international Agreement between administrations on the coordination of frequencies for terrestrial digital television and digital radio in the band 174–230 MHz (VHF III), which Albania, Bosnia and Herzegovina, Croatia, Greece, Italy, Montenegro, and Slovenia intend to sign.

The Agency actively participated in international conferences and workshops and presented its work in the field of radio frequency spectrum management. These included, in particular, experiences in awarding spectrum for verticals for local use, more efficient awarding of frequencies for fixed links for operators, the future use of frequencies in the band below 700 MHz, in the 4 GHz and 6 GHz bands at the following international events: the International Regulatory Conference 2024 in Ohrid, a webinar on the 6 GHz band with GSMA, the European Spectrum Management Conference in Brussels, the 9th Latin American Spectrum Management Conference, the ELMAR 2024 symposium in Zadar, the International Conference »A View on Connectivity: Innovations in Telecommunications Regulation and Security« in Budva, and a meeting of spectrum experts within the Eastern Partnership in Riga. At the Radio Communications Seminar in Ljubljana, the Agency presented the resolutions of the World Radiocommunication Conference 2023 (WRC-23). The Agency also organised a 5G Broadcasting workshop, a workshop of the working group for the exchange of best practices in the field of radio spectrum »Peer Review« within the RSPG, and an HCM group meeting. With these activities, the Agency contributed to greater recognition of its work both in Slovenia and internationally.

1.2 ACTIVITIES PART OF BEREC AND OTHER ELECTRONIC COMMUNICATIONS ASSOCIATIONS

As part of its international activities in electronic communications, the Agency cooperated with the EC, other regulatory authorities, and international organisations in this field, notably the Body of European Regulators for Electronic Communications (BEREC), the Independent Regulators Group (IRG), the International Telecommunication Union (ITU), the Organisation for Economic Co-operation and Development (OECD), the European Conference of Postal and Telecommunications Administrations (CEPT/ECC), and the European Network and Information Security Agency (ENISA).

The Agency significantly strengthened its cooperation with BEREC at all three levels (expert working groups, the contact network, and the plenary), which provided a much better understanding of current developments in Europe, trends, developments, and upcoming sectoral changes. In accordance with ZEKom-2, the Agency takes utmost account of BEREC guidelines, EC recommendations, and other sectoral regulations. Through this cooperation, the Agency also maintains and strengthens its indirect influence on the adoption and shaping of European policy and legislation.

In 2024, the Agency successfully applied for the position of Chair of BEREC in 2026. The Director of the Agency was elected at the third BEREC Plenary meeting to lead this important European body. The function encompasses numerous activities in the upcoming three-year period, as, according to the BEREC management system, the Director serves as incoming Vice-Chair in the year preceding their assumption of the Chair and as outgoing Vice-Chair in the year after, meaning active involvement in the leading team of this European body throughout this three-year term. As BEREC is an important advisory body to the EC, the Chair also brings significant influence and involvement in the regulation of the electronic communications sector in Europe. Related to this and the development of events at the European level within the scope of the regulatory framework reform, the Agency again participated in the preparation of BEREC's Work Programme for 2025. Since the election, a greater number of activities have been focused on preparations for assuming tasks within BEREC's three-person chairmanship, as well as on preparing a draft outline of BEREC's Work Programme for 2026. Its preparation is the task of the future BEREC Chair, and the Agency wishes to involve the domestic interested public in this as much as possible.

As part of the preparations for this demanding function, we established a new, more efficient system for monitoring, coordination, and support in the preparation of the required content for the upcoming three years, when there will be an immense number activities in this area. For even more thorough preparation for this period, the Agency held a bilateral meeting at the end of August with the Croatian regulatory authority HAKOM, which held the BEREC Chair in 2024. At the invitation of the Irish regulatory authority, which holds the BEREC Chair in 2025, the Agency also attended the first meeting of the new composition of the Mini-Board for 2025.

At the Plenary level, the Agency actively participated and contributed to the decisions of the highest level of BEREC at all four Plenary meetings and ensured the appropriate flow of information. In December 2024, the Agency hosted the Plenary meeting of the Board of Regulators and the Management Committee of BEREC, as well as the Plenary meeting of the IRG Assembly, in Ljubljana. The successfully held event was attended by 130 delegates, including the highest representatives of European regulators and members of BEREC.

The BEREC structure is two-tiered; the second part is the BEREC Office, which is one of EU agencies. The Agency monitored and closely cooperated with the BEREC Office's expert network groups, and additionally in the review of work at the Contact Network level and the confirmation of the Management Committee.

Within the framework of BEREC expert working groups, a total of 51 projects were carried out in 2024, which is more than the planned number, as not all could be fully foreseen during the preparation of BEREC's Work Programme for 2024. The Agency actively participated in the meetings of the working groups, in the preparation of documents, by exchanging views and opinions at various workshops, by providing comments in consultation procedures, and by providing information based on questionnaires and surveys. It strongly intensified its activities and became involved in the preparation of documents that are of strategic importance for the sector or are also of greater importance for the Agency and the national electronic communications market. Among these, the Agency's activities in preparing BEREC's response⁸ to the European Commission's White Paper »How to master Europe's digital infrastructure needs?« deserve special mention. The Agency was among the drafters of the BEREC guidelines under the Gigabit Infrastructure Act and also participated in the development of open internet measurement tools, in the preparation of frameworks for new BEREC strategies, and in the field of cybersecurity, where it carried out activities related to co-chairing a working group. It invited two operators active in the Slovenian market to actively participate in a workshop on network resilience. A1 Slovenija responded to the invitation with an interesting presentation on the difficult conditions for operators during the floods that affected Slovenia in 2023⁹.

At the Contact Network level, the Agency actively participated in all four regular meetings, carried out internal activities to exchange information and opinions, and informed project participants about the expert discussion that took place there.

The Agency, through its representatives, also played an active role in the consideration of new requests from third countries for cooperation with BEREC.

⁸ BEREC's input to the EC public consultation on the White Paper "How to master Europe's digital infrastructure needs?" <https://www.berec.europa.eu/en/document-categories/berec/others/berecs-input-to-the-ec-public-consultation-on-the-white-paper-how-to-master-europes-digital-infrastructure-needs>

⁹ <https://www.berec.europa.eu/en/events/berec-stakeholder-workshop-on-network-resilience>

In 2024, the Agency confirmed its participation in several ad hoc groups regarding cooperation procedures arising from Articles 32 and 33 of the European Electronic Communications Code (EECC), whose task is to review measures of other countries for which the EC perceives a possible negative impact on the EU's single market. Consequently, it prepared an opinion on the proposed measures in the electronic communications markets of Malta and Hungary. The latter subsequently withdrew the planned changes, and it was not necessary to issue the final opinion. Similarly, the Agency prepared an opinion for Sweden within the aforementioned group; the case will be concluded in 2025.

The Agency is also a member of the Independent Regulators Group IRG (IRG), where regular exchange of knowledge, best practices, and experiences takes place among members in areas complementary to the work of BEREC. The IRG annually holds workshops and training for experts from regulatory authorities, as well as webinars and workshops for the senior, decision-making levels, in which the Agency actively participated. Representatives of the Agency attended virtual training on the introduction of very high capacity networks, a webinar on artificial intelligence, and a workshop on the role of regulators in the digital age.

In 2024, the Agency also actively cooperated with the EC through the Communications Committee (COCOM), which consists of representatives of member states. Upon request, it responded to 88 international questionnaires in the field of electronic communications and provided the requested information. It participated in notification procedures when measures were being adopted. In cooperation with the relevant ministry, it prepared responses that were included in the discussion during the annual visit of the EC, with the aim to determine compliance and legality of operation.

The Agency monitored the work and actively participated within the framework of the CEPT/ECC working group (NaN). In October, it hosted a two-day meeting of the expert working group NaN2 in Ljubljana, which was held in a hybrid format and addressed specific topics related to number portability, numbering trust, and regulatory issues related to network technologies.

The exchange of information and cooperation between European regulators is crucial due to the nature of the Agency's work, and bilateral cooperation ranks high on its list of priorities. Cooperation with neighbouring regulators is particularly relevant as it provides a better response in resolving regional issues and identifying potential problems. This type of cooperation allows the Agency to acquire invaluable sectoral knowledge and information. In 2024, it hosted bilateral meetings with the regulators of Croatia, Montenegro, and Cyprus.

As part of the working group of competent national authorities for the security of electronic communications networks and services ECASEC (formerly Art. 13a) at ENISA, the main topic was the preparation of implementing acts for the implementation of the NIS-2 Directive¹⁰. By the deadline that expired in October 2024, only one-third of the member states had managed to transpose the directive into their national law. Slovenia is among those that have not done so. According to the latest public draft law transposing the NIS-2 Directive into national legislation, the Agency will retain a regulatory and supervisory role for sector-specific requirements in the field of network and service security. Obtaining knowledge in this demanding and rapidly evolving field has been extremely difficult, so the Agency values the opportunity to participate in the ECASEC expert group.

As co-chair of the BEREC Cybersecurity Working Group in 2024, the Agency helped to further deepen the cooperation between the ECASEC and BEREC groups, as well as with ENISA. This also led to joint events co-organised by all of them, which are of exceptional importance for regulators, not only for the exchange of best practices but also for introducing cooperation with industry and research institutions into this area of regulation.

The Agency also developed and established a new online tool for operators to report incidents based on Article 118 of ZEKom-2. Operators can test the tools, which will become mandatory in 2025 and replace the completely outdated and inadequate reporting via email. Until the transfer of competences and the establishment of such a tool at the National Cyber Security Incident Response Centre (SICERT), the Agency is obligated to report on received incident reports from operators to ENISA.

¹⁰ <https://eur-lex.europa.eu/eli/dir/2022/2555/2022-12-27/eng>

1.3 INTERNATIONAL ACTIVITIES IN THE FIELD OF MEDIA REGULATION

The Agency is a member of several groups of European regulators in audiovisual media services (European Regulators Group for Audiovisual Media Services – ERGA, European Platform of Regulatory Authorities – EPRA, and Central European Regulatory Forum – CERF) in which it participates in the development and updates to EU's legal mechanisms, in exchanging and monitoring legislative trends in the broader international environment, and transfers best regulatory practices in Slovenia.

The AVMS directive requires member states to ensure a free flow of audiovisual media services between EU countries, requiring the harmonisation of how national media areas are resolved, at least in the part that is covered by the directive, and cooperation between countries in electronic media. The above-listed platforms for exchanging regulatory systems and practices are very actively cooperating on this. The Agency also participates in the Contact Committee of the European Commission, where it has the important role of resolving the disputes related to jurisdiction, while also providing the data for the MAVISE database on audiovisual services and their jurisdiction in Europe, managed by the European Audiovisual Observatory.

ERGA's working groups focused on all the most significant areas relevant for the Directive's implementation. The Agency's employees actively participated in 5 ERGA working groups, and at both of its plenary meetings. As part of this it helped shaped further regulatory policy in the European, and consequently also at the national level. Through these working groups, the Agency participated in the transformation of ERGA into EBMS (European Board for Media Services), as called for by the Act, and in the preparation for its new competences and the start of its operation in 2025. As part of this, the Agency also participated in the discussion of other new developments of the adopted European Media Freedom Act, such as media concentration and its impact on the editorial independence of the media, rules on state advertising in the media, mechanisms for ensuring the independent work of journalists, media monitoring measurements, and others, which will begin to apply in 2025. The European Media Freedom Act (Regulation (EU) 2024/1083) is directly applicable, has been in force since May 2024, and will begin to apply on 8 August 2025. This Act introduces a new set of rules to protect media pluralism and independence in the EU. It regulates the protection of the editorial independence of the media and journalistic sources, ensures the independent operation of the media, increases the transparency of media ownership, protects the media from the unjustified removal of online content by online platforms, ensures the transparency of state advertising in the media and online platforms, requires states to assess the impact of media concentrations on media pluralism and editorial independence, and increases the transparency of audience measurement of the use of media services. The implementation of the Media Freedom Act will foreseeably be within the Agency's competence, and the relevant ministry is obligated to prepare an implementing act.

More important topics discussed on the platform also included mechanisms for the protection of children in the online audiovisual media world, aspects of the promotion of European audiovisual works in the media and the financing of the production of European audiovisual works, the use of artificial intelligence tools by regulators and in audiovisual media production, progress in accessibility to audiovisual media services and their content for persons with sensory disabilities in member states, the implementation of the Code of Conduct on Disinformation, which video sharing platforms must respect, and examples of best practices in the implementation of media literacy projects.

Within the European Platform of Regulatory Authorities (EPRA), the topics in 2024 focused on the impact of artificial intelligence systems on media and media regulators, preventing the spread of hate speech in the media, the potential impact of media literacy on elections, and addressing various aspects of the operation of video sharing platforms. The Agency actively participated with a presentation at the workshop on the current state of accessibility to audiovisual media services for persons with sensory disabilities in EU member states and on the possibilities of future technology development offered by modern application tools and artificial intelligence.

The Agency was invited by the European Commission to participate in the preparation of the report on the rule of law in Slovenia for the year, as it also includes the assessment of the Slovenian media landscape. In the last quarter of the year, the Agency cooperated with the European Commission against Racism and Intolerance (ECRI), which prepares a report on the situation in this area every 5 years in partnership with member states. In 2024, the Agency contributed reports on this situation in the media.

At the invitation of the Center for Media Pluralism and Freedom at the European University Institute in Florence, the Agency participated in preparing data for the report on media pluralism in the Republic of Slovenia, as part of the Media Pluralism Monitor 2025, a research tool designed to identify and monitor potential risks to media pluralism and serves to prepare the EU Commission's report on the rule of law in individual EU member states.

In 2024, the Agency also monitored all measures adopted by the EC to restrict the access to Russian media on the territory of Slovenia, which were adopted within the framework of security measures related to the war in Ukraine.

1.4 INTERNATIONAL ACTIVITIES OF THE DIGITAL SERVICES COORDINATOR

As the Digital Services Coordinator, the Agency is a member of the European Board for Digital Services (EBDS), which is an independent advisory group consisting of DSCs from all EU member states and chaired by the EC. Its task is advisory, coordinating, and supportive, both in relation to DSCs and to the EC in the performance of their tasks under the DSA. In 2024, the EBDS met at ten regular and two ad hoc meetings. At the regular meetings, it first established the rules of operation, adopted the rules of procedure, and then discussed the activities of the EC and individual DSCs. It actively monitored the situation on the European digital services market (e.g., the publication of annual reports of very large platforms and search engines) and the adoption of executive acts (delegated and implementing regulations, codes, guidelines). At both ad hoc meetings, the EBDS discussed issues related to individual platforms, namely X and TikTok.

In 2024, eight working groups within the EBDS began their work, meeting regularly once a month to discuss narrower substantive issues such as content moderation and access to data, online marketplaces, the integrity of the information space, the protection of minors, and criminal law issues. The Agency attended the EBDS meetings throughout the year and made proposals for its activities, and also regularly attended the working group meetings.

Another essential part of international cooperation is cooperation between Digital Services Coordinators. Among the most important tasks in this area is relating the complaints from Slovenian users against providers from other EU countries. In 2024, the Agency related one complaint from a Slovenian user to foreign regulators. The Agency cooperated with other Digital Services Coordinators mainly in the form of providing clarifications to inquiries, mostly through the Agora online tool.

1.5 INTERNATIONAL ACTIVITIES IN THE FIELD OF POSTAL SERVICES MARKET REGULATION

The Agency actively participated in the international associations ERGP (European Regulators Group for Postal Services), and CERP (European Committee for Postal Regulation). Agency representatives participated in the majority of ERGP working group meetings either in person or online. The Agency's representatives actively participated at all five ERGP working groups which focus on: (1) access and interoperability, (2) consumers and market indicators, (3) cross-border parcel delivery, (4) regulatory framework, (5) sustainability, and the additional (6) for monitoring and supporting the Study on the future of the postal industry. The Agency organised a meeting of the ERGP working group for sustainability in the postal sector in Ljubljana, followed by a meeting of the ERGP contact group.

The Agency organised a meeting of the ERGP working group for sustainability in the postal sector in Ljubljana, which was attended by 13 participants from 11 countries, followed by a meeting of the ERGP contact group, where 44 participants from 25 countries and the EC participated. The Agency attended two ERGP contact network meetings and two ERGP plenary sessions. Through its participation the Agency helped actively shape the European regulatory policies related to post, which will begin to take shape in 2026 when the new composition of the EC begins to implement the planned activities. It also attended CERP's plenary meeting. In the scope of the European Commission the Agency attended two meetings of the Postal Directive Committee (PDC).

In April 2024, the Agency attended a conference organised by the Belgian Institute for Postal Services and Telecommunications (BIPT) during Belgium's Presidency of the Council of the EU. It also attended in the Postal Services Day in Zagreb, organised by HAKOM, with a contribution: The last 10 (15) years of postal services market regulation in Slovenia.

For statistical purposes, the Agency reported to the EC, which has been responsible for collecting and processing data on the postal services market since 2014.

1.6 INTERNATIONAL ACTIVITIES IN THE FIELD OF RAILWAY MARKET REGULATION

The Agency was also active in the international field, participating in the bodies of the Directorate-General for Mobility and Transport, DG-Move EC, such as the European Network of Rail Regulatory Bodies (ENRRB), the Single European Railway Area Forum (SERAF), and the Rail Market Monitoring Scheme (RMMS), as well as in the working groups of the Independent Regulators Group – Rail (IRG-Rail).

As part of the working groups of the EC or its Directorate-General for Mobility and Transport, the Agency attended two meetings of the European Network of Rail Regulatory Bodies (ENRRB). The Agency's representatives also attended two virtual meetings of the Single European Railway Area Forum (SERAF), related to the development of the railway services market in individual member states and the preparation of new European legislation. The emphasis was particularly on the proposal for a European Regulation on the use of railway infrastructure capacity in the single European railway area, amending Directive 2012/34/EU and repealing Regulation (EU) No 913/2010.

In the area of monitoring market development, the Agency's task is, together with the relevant Ministry of Infrastructure, the EC or the Directorate-General for Mobility and Transport, to provide data on the state of the market in railway passenger and freight transport by the end of the current year for the previous year. As the EC informed the obligated parties for data provision at the end of November about the introduction of a new platform for reporting data, which it launched at the end of December 2024, and extended the deadline for data provision, the Agency did not report data for Slovenia in 2024.

The second part of international activities is related to the working groups of the association of independent regulatory bodies in railway transport – IRG-Rail. In 2024, the regulatory authority of Sweden chaired the association. The Agency attended two plenary meetings, the spring one of which took place in Falun, and the autumn one in Uppsala. The Agency also regularly attended meetings of the four working groups and two subgroups of the association: (1) monitoring legislation drafting, (2) usage fee charges (and subgroup: usage charges for additional services), (3) access to infrastructure and subgroup: access to additional services, and (4) market monitoring. Due to the aforementioned reduction in the Agency's planned revenues, representatives of the working groups mainly attended meetings via videoconference. The focus of IRG-Rail's activities in 2024 was the formation of common positions on the proposal for a new European Regulation of the European Parliament and of the Council on the use of railway infrastructure capacity in the single European railway area, amending Directive 2012/34/EU and repealing Regulation (EU) No 913/2010. Among other things, the draft Regulation provides for the establishment of an ENRRB secretariat, the financing of which, according to one of the options, should be provided by the regulatory authorities of the member states. This would represent an additional financial burden for the regulatory authorities, and therefore such a proposal is strongly opposed, especially by the regulatory authorities of smaller member states financed from regulated entities and not from the state budget.

In relation to ensuring equal access for carriers on European freight corridors, the Agency, in accordance with the cooperation agreement with the regulatory authorities of Austria, Croatia, Serbia, and Bulgaria, is responsible for resolving complaints, monitoring the situation on the Alpine-Western Balkan Corridor, and for taking action ex officio in case of detected unequal treatment of applicants. For the purpose of cooperation and information exchange, the Agency organised a meeting via videoconference between the regulatory authorities of the countries through which the corridor runs and the joint permanent office of the corridor, which is located in Ljubljana. At the meeting, the Agency, in cooperation with representatives of the permanent corridor office, presented the main indicators of the situation on the corridor.

As part of cooperation between regulatory authorities in railway transport, the Agency, at the invitation of the Regulatory Agency of the Republic of Croatia for Network Industries (HAKOM), attended an international event entitled »Is there a single European railway market?«. At the event, a representative of the Agency presented the situation on the railway services market in Slovenia.

2 THE ENDURANCE PROJECT

Since October 2024 the Agency is participating in a new European project that is part of the Horizon Europe programme for strengthening the resilience of critical infrastructure, named Strategies and Services for Enhanced Disruption Resilience and Cooperation in Europe, or ENDURANCE¹¹ for short.

The project aims to improve the resilience of critical infrastructure across Europe by focusing on enhanced co-operation in the field of critical infrastructure across all levels, especially with regard to data sharing and comprehensive risk assessment among critical infrastructure stakeholders, with the goal of improving the continuity of essential services in the event of disruptions such as cyberattacks, natural disasters, technical failures, or other crises that may threaten the operation of this infrastructure.

The partners within the ENDURANCE project will develop innovative technologies for secure data exchange and for conducting a joint risk assessment to ensure better resilience.

Acknowledging the importance of Directive (EU) 2022/2557 on the resilience of critical entities (CER) and Directive (EU) 2022/2555 on measures for a high common level of cybersecurity across the Union (NIS2) in laying the foundations for resilience and a parallel approach to ensuring the resilience of critical infrastructure (CI) and the continuity of essential services, the project partners will help critical infrastructure operators across the EU to better understand and harmonise the implementation of both directives by preparing proposals for an improved, unified strategy for the continuity of interdependent essential services. With a comprehensive understanding and preparation of proposals for legislative measures, the project aims to provide authorities of EU member states and CI operators with a better understanding of the topic, offer modern risk assessment methodologies, and facilitate the acquisition of significant experience through pilot projects. Key technologies that will be developed and tested in this project include secure data-sharing platforms, risk assessment tools, and a framework for resilience testing.

The project's international consortium comprises twenty-two partners from six European countries. In addition to the Agency, the Slovenian partners in the consortium are the Institute for Corporate Security Studies (ICS), ELES, the Telekom Slovenije, Government Information Security Office of the Republic of Slovenia (URSIV), and Silver Bullet Risk. The project is headed by Eviden Technologies SRL from Romania, and the consortium also includes: Engineering – Ingegneria Informatica SPA (Italy); Synelxis Lyseis Pliroforikis Automatismou & Tilepikonion Anonimi Etairia (Greece); Erevnitiko Panepistimiako Institouto Systimatou Epikoinonion Kai Ypologiston (Greece); Directoratul National de Securitate Cibernetica (Romania); Ministerul Sanatatii (Romania); Directia Generala de Protectie Internă (Romania); Clinica Ginecologie Dr. Muntean SRL (Romania); Regione Autonoma Friuli-Venezia Giulia (Italy); Insiel – Informatica per il Sistema degli Enti Locali S.P.A. (Italy); Perifereiako Tameio Anaptyksis Attikis (Greece); Perifereiako Tameio Anaptyxis Perif Dytikis Ellados (Greece); Etaireia Ydreyses Kai Apochetefseos Proteyoysis Anonimi Etairia (Greece); Timelex (Belgium); Diadikasia Business Consulting Symvouloi Epicheiriseon AE (Greece); and Carr Communications Limited (Ireland).

The Agency is a partner in several areas of the project: coordinating project activities, establishing pilot systems for testing solutions developed by project partners under real-world scenarios. Furthermore, it will have a key role in the pilot project, which will be a part of the ENDURANCE project, focusing on disruption resilience in the digital and energy sectors, as they are strongly interconnected and interdependent.

The ENDURANCE project will run for three years, until October 2027. The total project budget is EUR 6.48 million, with the European Commission providing co-financing of EUR 5 million in the form of grants. By participating in this European project, the Agency pursues its strategic goals to strengthen its competences, help create European policies related to its activities, and strengthen international recognition and international activity.

¹¹ <https://endurance-horizon.eu/>

XIV INSTITUTIONAL ADMINISTRATION

1 ORGANISATION AND HUMAN RESOURCE CHALLENGES

1.1 INSTITUTIONAL AND ORGANIZATIONAL CHANGES

There were two major developments in field of human resources for the Agency, in addition to the regular tasks. The first was the new classification of work positions, which occurred due to the reorganisation of the Agency following the adoption of a new Articles of Association. The second was related to the adoption of the new Common Foundations of the Public Sector Salary System Act.

The change in work position classification was a logical consequence and a necessary measure following the amendment of the Agency's Articles of Association, which reduced the number of internal organisational units or sectors from 11 to 8. In addition to its existing competences, the Agency also gained the competence of the Digital Services Coordinator and other tasks within the Agency's competence, as defined by the EU regulation governing the single market for digital services and by the act implementing this regulation. Due to the significant impact on the existing work position classification, a new act on work position classification and a new work position classification plan were prepared. New employment contracts and updated accompanying documentation were prepared for all employees.

The second major change occurred in November 2024, when the Common Foundations of the Public Sector Salary System Act was adopted, which entered into force on 23 November 2024 and will be applied from 1 January 2025. One of the key new developments is the new salary system, which required the salaries of all employees to be converted to the new salary scale and amendments to employment contracts to be issued.

1.2 NEW hirings

The Agency is not part of the staffing plan for entities governed by public law. Its human resource plan is approved along with the operational and financial plan, and based on this the Agency systematizes its work positions. In the approved Operational and Financial plan for 2024 the Agency planned to have 112 employees, which is 5 more than the year before. The increase in the number of employees is the result of the planned assumption of new tasks within the established new digital services sector. At the end of the year, one position remained vacant, but the candidate has already been selected and will join the Agency in 2025.

At the end of 2024 the Agency employed 104 public servants for indefinite period, with one employee entitled to half-time employment by decision of the Pension and Disability Insurance Institute of Slovenia. In 2024, staff turnover was slightly lower than the previous year, as 7 public servants departed from the Agency. All employees continued their careers with other employers. One employee had fulfilled the conditions for retirement and expressed the desire for part-time employment, which the Agency granted. This will allow the employee to be partially relieved of full working hours, while at the same time maintaining social contacts and ensuring the valuable transfer of knowledge to younger colleagues through involvement in the work process.

In 2024 the labour market faced an even more severe shortage of suitable job seekers for all types of profiles and across all industries. In spite of the lack of candidates the Agency was still successful in attracting new employees, as it managed to employ 14 new colleagues for an indefinite period in 2024. It reviewed the status of some positions that had remained unfilled for several years and adjusted the requirements in job postings for these positions regarding experience. This improved the possibility of receiving applications for the positions from more candi-

dates. At the same time, the Agency remained within the necessary framework for regulators in terms of efficient and professional fulfillment of legally mandated obligations. With these new hires, the Agency either replaced employees whose employment had ended or filled positions that were previously vacant but already part of the organizational structure. Despite the above, challenges related to employment remain, and therefore additional measures will need to be taken in the coming years to attract new employees, such as raising salary levels for the most sought-after staff, enabling student work and employing young people immediately after graduation, introducing mentoring or co-mentoring in undergraduate and master's theses, active HR promotion of the Agency, and developmental human resources management.

1.3 STRENGTHENING COMPETENCIES, KNOW-HOW AND ORGANISATIONAL CULTURE

The Agency has added new activities when introducing new employees to the work process, the new environment, and organizational culture. Already in 2024 it introduced mentorship, which new employees accepted extremely positively. At the end of the probationary period, new employees have the opportunity to evaluate their mentor and the entire onboarding process, providing feedback to the Human Resource Department on the satisfaction and effectiveness of mentorship, and the Agency plans to continue with this practice.

In 2024 we introduced developmental human resources management, whose main goals are the development of employee competences, succession planning, employee retention and motivation, strengthening of organisational culture, optimisation of human resources processes, and promotion of commitment and productivity.

To ensure business continuity, the Agency conducted a survey of business processes and identified essential business competences for each sector in 2024, with the aim of better directing tasks and thereby increasing productivity and the ability to fill in for colleagues during their absences. In the future, the competence survey will serve to identify which know-how and which skills are lacking and where additional training is needed. This approach will contribute to a strategic human resources policy, as it makes it possible to plan future employment and to adjust human resources according to set goals. After establishing the situation, the Agency will introduce a mentoring programme for the appropriate transfer of competences.

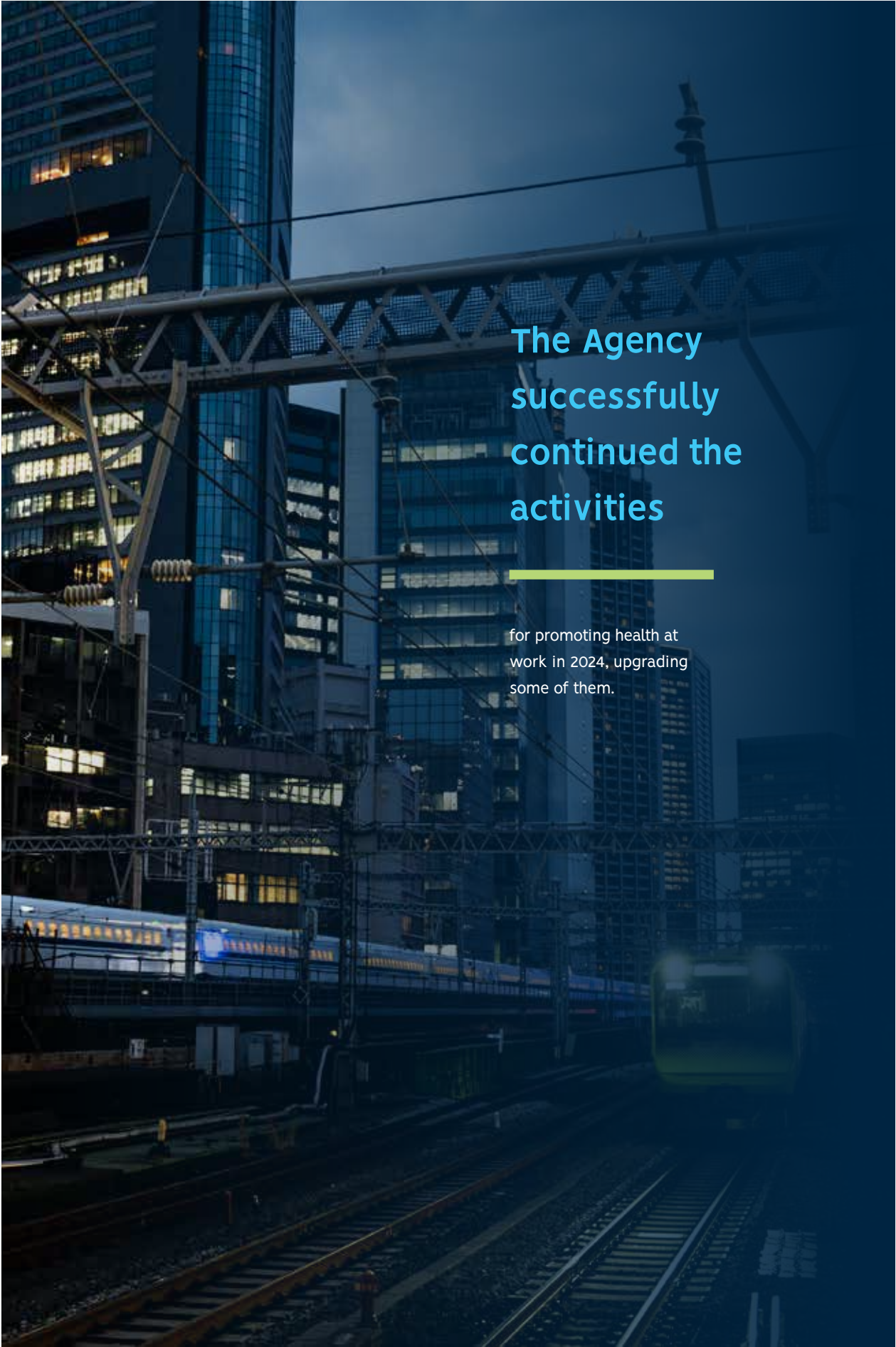
Despite the high level of education of the Agency's employees (nearly three-quarters have at least a university degree) the Agency strives towards the constant education and development of its employees, as an appropriately professional regulator operating in an industry that has developed, intensive and competitive human resources must constantly provide expert and specialist training to its employees. Focused employee development was planned for 2024 through individual and group training modules, prepared in cooperation with renowned external experts and organizations.

In 2024, the Agency organised training for all employees in the field of administrative operations and the Act on General Administrative Procedure, with an emphasis on the provisions of the Act on Debureaucratisation. Public servants whose job requirement includes passing the general administrative procedure exam or the inspectorate exam were sent for training and also facilitated in taking the exam. All employees passed the exam successfully. Two employees completed mediator training, and the Agency provided refresher training for other employees who already have such qualifications. The Agency was also successful in organizing professional training, as most of the planned training sessions were completed.

Regarding the strengthening of organisational culture, the Agency prepared its own code of ethics, which, among other things, lays down the values and ethical principles, rules of conduct, and expectations that employees must adhere to in the work environment. The Agency provided the employees with the opportunity to discuss the draft code, giving them the opportunity to contribute and co-create the content, which was extremely well received among employees.

1.4 ACTIVITIES RELATED TO SOCIALLY RESPONSIBLE EMPLOYER

In September 2023, the Agency obtained the Socially Responsible Employer certificate, and it continued with acti-



The Agency successfully continued the activities

for promoting health at
work in 2024, upgrading
some of them.

vities in 2024. The certification is focused on two areas, namely:

- | balancing professional, family and personal life, and
- | the importance of workplace safety and health.

The Agency completed all the required activities to retain the certificate in 2024. Through all of these measures, and especially by establishing and maintaining a healthy work environment, increasing employee dedication, improving risk management, reducing churn and operating on high ethical measures, the Agency will continue to strive to become an even more competitive partner in the labour market and increase the power and reputation of the national regulator.

For preserving employees' health in accordance with legislation on work safety and health the Agency maintains regular temporary or goal-oriented periodical medical check-ups and training courses on work safety with the help of an authorized doctor and an external authorized expert on work safety. Employees in the risk group, i.e. those who conduct field measurements, received preventive vaccinations against tick-borne encephalitis. The Agency successfully continued the activities for promoting health at work in 2024, upgrading some of them. The spring and autumn health days, which included educational content on healthy living, physical activity, and prevention of occupational diseases, were particularly informative and beneficial for the nature of the Agency's work.

Throughout the year, the Agency encouraged employees to be active and also provided them with the opportunity for preventive exercise on the Agency's premises. Employees were highly motivated for these activities, as evidenced by their high participation in weekly stretching sessions. Additionally, the Agency informed employees about health maintenance and disease prevention through articles on the Agency's notice board or via email in the form of health promotion leaflets, and organized activities to promote the consumption of locally produced, organic food for employees.

Ergonomic workplace equipment is of paramount importance for the health, productivity, and well-being of employees, as it contributes to reducing physical strain and injuries, increases productivity and efficiency, and prevents carpal tunnel syndrome and other musculoskeletal problems. The Agency is aware that a healthy working environment means greater focus on work, and properly positioned equipment reduces unnecessary movements and fatigue. Therefore, it gradually began to equip workplaces with ergonomic chairs and height-adjustable desks, in line with available resources. Regularly changing position and the use of standing desks reduce the risk of back problems. In 2024, the Agency provided employees who expressed a desire for these aids with ergonomic pads, mice, and footrests.

At the end of 2024, the Agency also conducted workplace environment measurements, with which it checked the thermal conditions in which employees work and the adequacy of natural and artificial lighting. The results showed very good lighting of work spaces, which is the result of replacing most lamps with ecologically more efficient and friendly LED panels.

2 ENSURING PUBLIC TRANSPARENCY AND INFLUENCE

2.1 PUBLIC RELATIONS

In 2024, the Agency carried out a range of public relations activities, which is related both to the expansion of the scope of competences and to the activities in the field of the Agency's competences. It held two press conferences. At the first, it presented the work of the Digital Services Coordinator to the public, as it assumed this competence in 2024 in accordance with the European Digital Services Act. The Agency's goal was to inform Slovenian users and providers of digital services about the new obligations and opportunities this introduces.

At the second press conference, which it coordinated and hosted on behalf of several state bodies, it presented the joint supervisory activities and further steps that it has taken in the field of TV advertising, in relation to advertising of health-related products and services, as stipulated by the Audiovisual Media Services Act. In connection with this topic, the Agency prepared press releases in cooperation with all participating institutions. The Agency also recei-

ved an increased number of media inquiries regarding these topics, pertaining to the Agency's actions in this area. There was also an increased number of requests to participate in electronic media shows, to which the Agency responded positively and extremely promptly, which significantly contributes to strengthening the Agency's reputation as the electronic media regulator, and to the Slovenian public's accessibility of the Agency's management.

In total, the Agency received 56 media inquiries in 2024 and responded to them within the legally prescribed period. The number of journalist requests increased compared to the previous year, which shows that the Agency's exposure in the public and media sphere is growing. There was also a lot of public interest in the preparation of the new Media Act and the consequences of financial difficulties of one of the electronic communications operators and announced takeovers in this market. A large part of media interest in 2024 consisted of questions related to the supervision of digital services, which is an area that did not exist within the Agency in previous years. The Agency also notes that the media is turning to it as a reference for questions about the regulation of this area at the European level, as the Agency has received several informal inquiries and requests for clarification, to which it has also responded.

In accordance with the legislation, the Agency is obliged to adequately inform its stakeholders on its website. In 2024, in part due to the reorganisation of the Agency and the assumption of the competence of the Digital Services Coordinator, the website was adapted and explanations were added in this regard, all with the aim of transparently informing all stakeholders and the broad public. It published a total of 62 press releases, 12 of which it sent as e-newsletter. In its press releases, the Agency focused on the calls for tenders it held, the operation of the AKOS Geoportal, provided information about the entry point for persons with disabilities, responded to developments in the electronic communications market, informed about numerous user awareness activities launched by the MiPi portal, informed the public about its activities related to international connections, especially about chairing one of the important associations that connects European electronic communications regulators (BEREC), and has regularly informed the public about its participation in other international and domestic professional meetings in the areas of the Agency's competence.

Along with these, the Agency also published 154 other types of content on its website, from invitations to public consultation and workshops, general acts, comments provided to them, decisions, notifications, job listings and other.

In 2024, the Agency upgraded the eAnalitik web portal, and also carried out a review of the accessibility statement of the websites and compliance with the provisions of the Accessibility of Websites and Mobile Applications Act (ZDSMA) for eAnalitik and the Agency's website.

The Agency continues growing its presence on both social networks where it has an account, namely on X and LinkedIn, with the goal of improving the Agency's recognition and of the impact its decisions have on everyday lives of users and the competition on the markets that fall under the Agency's authority. For X and LinkedIn the Agency designed and prepared a total of 88 content-adapted posts related to its achievements, decisions, analyses, research, workshops, tenders, and other activities or events it and its representatives participated in.

Along with these the Agency also publishes articles on the Media and information literacy (MiPi) portal, and has designed and prepared for MiPi a series of Facebook and Instagram posts. In total the Agency published 106 posts on these networks.

If we include website posts, MiPi posts and social network posts, the total number of posts made by the Agency in 2024 tallied to 422.

For transparent and fast communication with employees of achievements, events, updates, and changes at the Agency, information on new employees or departures of existing ones, the Agency utilizes an internal communication portal called Reg.la. The Agency addressed its employees with a total of 70 posts.

Along with these the Agency also received 2 requests for providing answers from other members of the public and provided responses.

Within BEREC, the Agency participates in the group of experts for communication. It attended one of the meetings in person, and the remaining three online. The heart of the work of this working group are expert discussions regarding the future communication strategy of BEREC, as well as the challenges commonly faced by regulators under the auspices of BEREC, particularly regarding informing the public about technically complex topics. The Agency has contributed its opinion to BEREC's communication strategy for 2025 and participated in a joint campaign to inform end-users about the sustainable management of electronic devices.

2.2 ENSURING PUBLIC INFORMATION

The Agency makes it possible for natural and legal persons to exercise their constitutional right to obtain and reuse public information from Article 3 of the Constitution of the Republic of Slovenia and in accordance with the Public Information Access Act. In 2024, the Agency received 28 requests for access to public information, resolved 26 of them, and carried over the remaining two into 2025. Within the statutory deadline of 20 business days, 22 cases were resolved, with 3 of them within an extended deadline in accordance with Article 24 of the ZIPRS. Only one case was resolved after the deadline due to the complexity of the subject matter.

Any decision by the Agency in which it fully or partially rejects the applicant's request, can be contested at the body of second instance (Information Commissioner of RS). In 2024 there were no complaints against the Agency's decisions.

However, in 2024, the Agency received two decisions related to the review in an administrative dispute. In December 2024, it received a case for reconsideration, in which the Information Commissioner, as a second-instance body, initially confirmed the Agency's decision, but his decision was overturned in an administrative dispute. In the repeated procedure, the Information Commissioner then upheld the appeal, overturned the Agency's decision, and returned the case to the Agency for reconsideration. In March 2024, the Administrative Court of the Republic of Slovenia also upheld the appeal against the decision of the Information Commissioner, partially overturned the Agency's decision, and returned the case to the Agency as the first-instance body for reconsideration.

As part of ensuring transparency, the Agency regularly updates the catalogue of public information, and in 2024 it did so five times. The reasons for the update were changes in the members of the Agency's Council and the Council for Electronic Communications of the Republic of Slovenia (SEK), the reorganisation of the Agency, and added procedures based on the new competence in the field of digital services.

3 INFORMATION SUPPORT

Information support is of key importance for the operation of the Agency and the fulfilment of its mission. It is important that it is properly established in the technical part and in terms of software, while at the same time ensuring information security and quality care for the end-user of the system. The Agency ensures regular maintenance of its information system, ensuring smooth operation of hardware and software, as well as the local network, and provides support to users. To this end, it also regularly updates its software to the latest stable versions and ensures adequately functioning and upgraded hardware.

Due to the expansion of its operational competences and the establishment of a new sector, the Agency expanded its network into new premises in 2024.

The most significant event related to technical equipment in 2024 was the replacement of the server core, namely the replacement of outdated physical servers on which the Agency's virtual environment is established. In addition to the server upgrade, in 2024 it also replaced network switches, wireless network equipment, network device authentication equipment, web traffic protection and verification system, and IP telephone equipment.

In 2024, the Agency switched its internet and telephone service provider, while also increasing the speed of the internet connection. This provided internal users with greater capacity, quality, and transparency of the internet connection.

The Agency is aware of the importance of information security, and it conducted a security audit with network penetration in 2024, adhering to the recommendations of the security audit provider. After receiving the report, it eliminated most of the detected security vulnerabilities. Accordingly, the Agency will continue to maintain security mechanisms and other activities to ensure the highest possible level of information security, and above all, to raise user awareness. Training employees and users on all aspects of information security is crucial for ensuring information security, so employee training was carried out by the security audit provider in 2024 after the audit was completed. In addition to the system security audit, the second part of the security audit of the program code for the software solution intended for capturing data of obligated parties for mandatory reporting tool ePodatki, which is in the final phase of development and transition to production, was also completed.

The Agency strives to ensure that its websites are compliant and accessible to everyone, including people with disabilities, and therefore continued with activities and updates on the websites in 2024. In accordance with the Accessibility of Websites and Mobile Applications Act (ZDSMA), it upgraded the MiPi website and began activities to upgrade the website of SEK. In addition, employees attended a workshop on ensuring the accessibility of websites and mobile applications.

In 2024, the Agency continued its efforts to replace its enterprise resource planning (ERP) system eAKOS, which is complex but crucial for Agency's operations. It successfully completed the development of three new modules for issuing decisions related to radio communications, which will be put into production in 2025. The development and takeover of a set of three other modules related to postal services, electronic communications, and radio frequency spectrum supervision continues in 2025 due to unforeseen circumstances. The new ERP will come into operation in 2026.

The Agency will continue to direct resources towards the optimisation and digitalisation of its business processes. To this end, the purchase of software solutions for issuing travel orders and a system for the digital management of received invoices are already planned.

4 OTHER SUPPORT ACTIVITIES

As part of its activities directed at raising awareness about corruption and its consequences among employees, the Agency in 2024 performed all the required activities, and reported to the Corruption Prevention Commission in accordance with the law.

Employees regularly received the KPK VESTnik newsletter.

In the last quarter of 2023, the Agency was also under the scrutiny of two supervisory bodies. The Ministry of Digital Transformation carried out supervision of the legality of the Agency's operations, and the Public Sector Inspectorate conducted an inspection of the Agency's administrative operations. Both supervisory bodies completed their work in 2024. The Agency informed employees of the inspector's findings in the field of administrative operations and carried out all activities to eliminate irregularities. The Ministry of Digital Transformation, on the other hand, supervised the procedure for issuing tariffs in the field of electronic communications for the period from 2020 to 2022 and reviewed business trips and training by employees. It found no irregularities.

5 INTERNAL AUDIT

Internal audits at the Agency are commissioned to a contractor in accordance with Articles 10 and 12 of the Rules laying down the policies for a coordinated function of public internal financial control system. In 2024, the Agency conducted an internal audit through external contractors. The purpose is to verify and ensure the existence and operation of internal controls that ensure that a specific area is adequately regulated by internal rules and applicable regulations. At the same time, the purpose of the internal audit is also to prepare reports for improving the Agency's operations while taking into account significant risks.

The Agency conducted an internal audit of the calculation and payment of salaries. In this scope it verified the compliance of the calculation with applicable legislation and internal regulations, and also the correctness of the calculation of salaries and other employee benefits in individual cases. After obtaining the report, the Agency will begin to regulate the processes in 2025. The Agency also continued to actively implement the recommendations regarding the findings of the internal audit for 2023 in the area of below-threshold contracts.

6 SUPPORT FOR THE SLOVENIAN COMMITTEE FOR ELECTRONIC COMMUNICATION AND THE BROADCASTING COUNCIL

The Agency provides resources and administrative support to the Slovenian Committee for Electronic Communications (SEK) which has the function of a consulting body. SEK provides opinions, recommendations, and proposals regarding electronic communications issues, including the protection of consumers, persons with disabilities and users with special social needs in this area. In 2024 the Agency's representatives participated at all of SEK's 12 regular and 1 correspondence meeting. The Agency regularly responded to the questions and initiatives from SEK and provided clarifications. At the meetings it informed SEK with its activities. The Agency always carefully reviewed SEK's opinions and comments and took positions on them. It also republished SEK's announcements on its website.

The Agency provides the funding for the work of the Broadcasting Council (SRDF) and provides technical, expert, financial and administrative support. The Agency's representatives attended all of SRDF's meetings, and held preparatory meetings of the Agency and SRDF beforehand. In 2024 there were 12 regular meetings. The Agency co-operated with SRDF in two public tenders for awarding radio frequencies for analogue audio broadcasting and in the public tender for awarding the right to disseminate radio programming on the national network in digital broadcasting technology. SRDF also provided the Agency with provisional opinions in the procedures of issuing or transferring licenses for radio or television activity and in the procedures of obtaining or revoking the statuses of a station of special importance.



XV IMPLEMENTATION OF THE FINANCIAL PLAN

The Agency drew up its 2024 Operational and Financial Plan in accordance with the relevant legislation, and set the tariffs for 2024 on accrual basis, and detailed notes on the structure of planned expenses for materials, goods, and services and other expenses by the type of activity are given in the chapter Financial plan realization on accrual basis.

The Agency strove to realize the planned activities and financial targets from its operating and financial plan for 2024 in the areas it regulates. By cash flow principle the Agency realised 111.8% of the planned revenue and 92.1% of the planned expenditures. The Agency had higher revenues than planned from current revenues for the provision of the public service, revenues from the state budget, revenues from the EU budget, interest income and capital revenues. The higher total revenue is mainly due to revenues for the provision of the public service from frequencies and notifications.

The higher revenue from frequencies in 2024 is mainly the result of more points for fixed links than initially planned. The Agency had planned for 200,000 fewer points for fixed links due to the planned reallocation and simplification of procedures; however, the negotiations with the Ministry of Defence regarding the 70–80 GHz band – a key band for operators with fixed links – were delayed. Because of these delays General act amending the General act on the radio frequency utilization plan (NURF–5a), which is the basis for awarding this band, was published only on 10 August 2024. In parallel, the Agency started preparing an online service and a graphical presentation of fixed links. DARFs were then issued on 10 December 2024, and came into force on 1 January 2025. In the interim period, a strong rise in applications continued due to the expansion of capacities and the improvement of network quality resulting from the introduction of 5G technology. Since points were finally set for 2024 in the plan, the Agency issued 1,289 new DARFs in 2023, which brought in 741,217 new points in 2024. In 2024, an additional 1,351 DARFs were issued, resulting in 371,820 additional points. This collectively amounts to more than 1,100,000 points. The Agency also revoked 647 DARFs during this period, which reduced the number of points by 209,600. Nevertheless, the total increase in points amounted to more than 900,000.

For mobile links, the realisation was higher because the increase in the discount factor for frequencies awarded in 2021 was not taken into account in the planning. Additionally, applications for ships, aircraft and radio amateurs contributed to the increase in the number of points. The plan for 2024 also did not include two new multiplexes (MUX R4 and R5) being awarded, which further contributed to the higher realisation of revenues.

The higher revenue from notifications is due to special establishing procedures carried out ex officio at certain operators. In these procedures, the Agency verified discrepancies between the data reported to the Agency and the data reported by the operators to AJ PES, and identified some deviations in the reported data. Furthermore, in the financial plan, the Agency had not planned for revenues for the implementation of activities for the establishment of the Digital Services Coordinator, budgetary revenues for the execution of the tasks of the Digital Services Coordinator, and revenues for the implementation of the EU project. The lower expenditure is mainly due to the lower realisation of costs of goods, materials, and services, particularly for office and general supplies and services, energy costs, business trips, and leasing costs. The lower realisation is also the result of lower labour costs, as the Agency did not realise the planned scope of new hirings in line with the human resource plan.

When recognizing revenue and expenses, the Agency complied with the rules on cash basis accounting. The Statements of Revenue and Expenses for specific users compiled on cash basis for the period between 1 January 2024 and 31 December 2024, shows that the Agency recorded EUR 9,252,692 in revenue, EUR 8,480,458 in expenditures, and a profit of EUR 772,234. Notes regarding the changes in separate revenue and expense items that resulted in the profit are presented below.

Revenue and expenditure account categorized according to the cash flow method for the year 2024 is shown in tables 14 and 15. Cash flow for the year 2024 is shown compared to the realisation for the year 2023 and the adopted 2024 Operational and Financial Plan.

TABLE 14: STATEMENT OF REVENUE AND EXPENSE FOR SPECIFIC USERS ON CASH BASIS FROM 1 JANUARY TO 31 DECEMBER 2024, 1ST PART

in EUR (without cents)							
Classification by account	Account title	Label for ADP	Amount		2024 FP	Index current year/ previous year	Index current year/ 2024 FP
			Current year	Previous year			
1	2	3	4	5	6	7=4/5	8=4/6
	I. TOTAL REVENUE (402+431)	401	9.252.692	7.053.174	8.273.482	131,2	111,8
	1. REVENUE FOR PROVIDING PUBLIC SERVICES (403+420)	402	9.252.692	7.053.174	8.273.482	131,2	111,8
	A. Revenue from public funds (404+407+410+413+418+419)	403	175.648				
	a. Funds received from the government budget (405+406)	404	175.648				
part of 7400	Funds received from the government budget for current expenditure	405	175.648				
part of 7400	Funds received from the government budget for investments	406					
	b. Funds received from the municipal budgets (408+409)	407					
part of 7401	Funds received from municipal budgets for current expenditure	408					
part of 7401	Funds received from the municipal budgets for investments	409					
	c. Funds received from social insurance funds (411+412)	410					
part of 7402	Funds received from social insurance funds for current expenditure	411					
part of 7402	Funds received from social insurance funds for investments	412					
	d. Funds received from public funds and agencies (414+415+416+417)	413					
part of 7403	Funds received from public funds for current expenditure	414					
part of 7403	Funds received from public funds for investments	415					
part of 7404	Funds received from public agencies for current expenditure	416					
part of 7404	Funds received from public agencies for investments	417					
part of 740	e. Funds received from budgets associated with foreign grants	418					
741	f. Funds received from the government budget financed from EU budget	419					
	B) Other revenue for providing public services (421+422+423+424+425+426+427+428+429+430)	420	9.077.044	7.053.174	8.273.482	128,7	109,7
part of 7102	Interest received	422	173.401	125.275	10.000	138,4	1.734,0
part of 7100	Revenue from profit sharing and dividends, and surplus	423					
7103	Revenue from rents and leases, and other property income	487					

part of 7141	Other current revenue from providing public services	424	8.786.385	6.907.815	8.214.032	127,2	107,0
72	Capital revenue	425	8.915	200		4.457,5	-
730	Grants received from domestic sources	426					
731	Foreign grants	427					
732	Grants for natural disaster relief	428					
782	Other funds received from the EU structure funds budget	488					
783	Other funds received from the EU Cohesion fund budget	489					
784	Other funds received from the EU budget for centralised and other EU programmes	490					
786	Other funds received from the EU budget	429	108.343	19.884	49.450	544,9	219,1
787	Funds received from other European institutions	430					
	2. REVENUE FROM THE SALE OF GOODS AND SERVICES IN THE MARKET (432+433+434+435+436)	431					
part of 7130	Revenue from the sale of goods and services in the market	432					
part of 7102	Interest received	433					

The statement of revenue and expense for specific users compiled on a cash basis continues on the next page.

TABLE 15: STATEMENT OF REVENUE AND EXPENSE FOR SPECIFIC USERS ON CASH BASIS FROM 1 JANUARY TO 31 DECEMBER 2024, 2ND PART

in EUR (without cents)							
Classification by account	Account title	Label for ADP	Amount		2024 FP	Index current year/ previous year	Index current year/ 2024 FP
			Current year	Previous year			
1	2	3	4	5	6	7=4/5	8=4/6
	II. TOTAL EXPENSES (438+481)	437	8.480.458	7.320.460	9.212.594	115,8	92,1
	1. EXPENSES FOR PROVIDING PUBLIC SERVICES (439+447+453+464+465+466+467+468+469+470)	438	8.480.458	7.320.460	9.212.594	115,8	92,1
	A. Salaries and other employee benefits (440+441+442+443+444+445+446)	439	4.245.601	3.934.201	4.504.712	107,9	94,2
part of 4000	Salaries and premiums	440	3.799.010	3.495.621	3.955.096	108,7	96,1
part of 4001	Holiday allowance	441	124.784	112.740	138.030	110,7	90,4
part of 4002	Reimbursements and compensations	442	226.174	224.690	327.657	100,7	69,0
part of 4003	Performance bonuses	443	67.453	64.523	82.091	104,5	82,2
part of 4004	Funds for overtime	444	16.453	2.577	-	638,5	-
part of 4005	Salaries of non-residents with contracts	445					
part of 4009	Other employee-related expenditure	446	11.727	34.050	1.838	34,4	638,0
	B. Social security contributions paid by the employer (448+449+450+451+452)	447	667.191	611.590	706.082	109,1	94,5
part of 4010	Pension and disability insurance contributions	448	338.503	311.305	357.493	108,7	94,7
part of 4011	Health insurance contributions	449	275.832	253.961	285.994	108,6	96,4
part of 4012	Unemployment insurance contributions	450	2.335	2.151	2.600	108,6	89,8

part of 4013	Parental protection insurance contributions	451	3.892	3.584	3.900	108,6	99,8
part of 4015	Premiums for collective supplementary pension insurance based on ZKDPZJU	452	46.629	40.589	56.095	114,9	83,1
	C. Expenses for goods and services associated with the provision of public services (454+455+456+457+458+459+460+461+462+463)	453	2.310.037	2.017.728	2.802.920	114,5	82,4
part of 4020	Office and general supplies and services	454	542.243	516.254	785.284	105,0	69,1
part of 4021	Special supplies and services	455	58.059	46.040	74.000	126,1	78,5
part of 4022	Energy, water, utility services, and communications	456	149.555	187.774	290.513	79,6	51,5
part of 4023	Transportation costs and services	457	40.141	34.580	43.300	116,1	92,7
part of 4024	Expenses for business trips	458	163.371	143.123	278.590	114,1	58,6
part of 4025	Regular maintenance	459	695.098	686.579	679.855	101,2	102,2
part of 4026	Operating rent and lease fees	460	144.058	138.663	246.600	103,9	58,4
part of 4027	Fines and damages	461					
part of 4028	Payroll tax	462					
part of 4029	Other operating expenses	463	517.512	264.715	404.778	195,5	127,9
403	D. Domestic interest payments	464					
404	E. Foreign interest payments	465					
410	F. Subsidies	466					
411	G. Transfers to individuals and households	467					
412	H. Transfers to non-profit organizations and institutions	468					
413	I. Other current domestic transfers	469					
	J. Capital expenditure (471+472+473+474+475+476+477+ 478+479+480)	470	1.257.629	756.941	1.198.880	166,1	104,9
4200	Purchase of buildings and premises	471		121.200	10.000		
4201	Purchase of vehicles	472	88.894	652	70.750	-	-
4202	Purchase of equipment	473	681.676	255.425	596.180	266,9	114,3
4203	Purchase of other operating fixed assets	474					
4204	Construction, reconstruction, and renovation	475					
4205	Major maintenance and renovation	476		129.663		0,0	-
4206	Purchase of land and natural resources	477					
4207	Purchase of intangible assets	478	487.059	250.001	521.950	194,8	93,3
4208	Feasibility studies for projects, project documentation, supervision, project engineering	479					
4209	Purchase of reserves of goods and intervention stocks	480					
	2. EXPENDITURE FROM THE SALE OF GOODS AND SERVICES IN THE MARKET (482 + 483+ 484)	481					
part of 400	A. Salaries and other employee benefits from the sale of goods and services in the market	482					
part of 401	B. Social security contributions paid by the employer from the sale of goods and services in the market	483					
part of 402	C. Expenditure for goods and services from the sale of goods and services in the market	484					
	III/1 SURPLUS (401-437)	485	772.234	-	-	-	-
	III/2 DEFICIT (437-401)	486	-	267.286	939.112	-	-

1 REVENUE

Based on cash flow the Agency generated EUR 9,252,692 in revenue in 2024. Namely, it received EUR 175,648 (AOP code = 404) from the state budget (1.9%) for the implementation of the tasks of the Digital Services Coordinator, EUR 8,786,385 (AOP code = 424) of other current revenues from the provision of public services, i.e., revenues from regular operations (95.0%), payments made by regulated entities based on issued decisions on payment, and other credible documents, EUR 173,401 in interest (AOP code = 422) from received interest (1.9%), EUR 108,343 (AOP code = 429) of other received funds from the EU budget (1.1%) for the reimbursement of business trip expenses and for the implementation of the EU project, and EUR 8,915 (AOP code = 425) in capital revenues (0.1%).

The Agency's regular operating revenue (ADP code = 424) grew by EUR 1,870,335, i.e., 27.2%, in 2024, compared to the previous year (of which EUR 1,870,335 came from operational revenue – Table 16). Significant changes are primarily the result of:

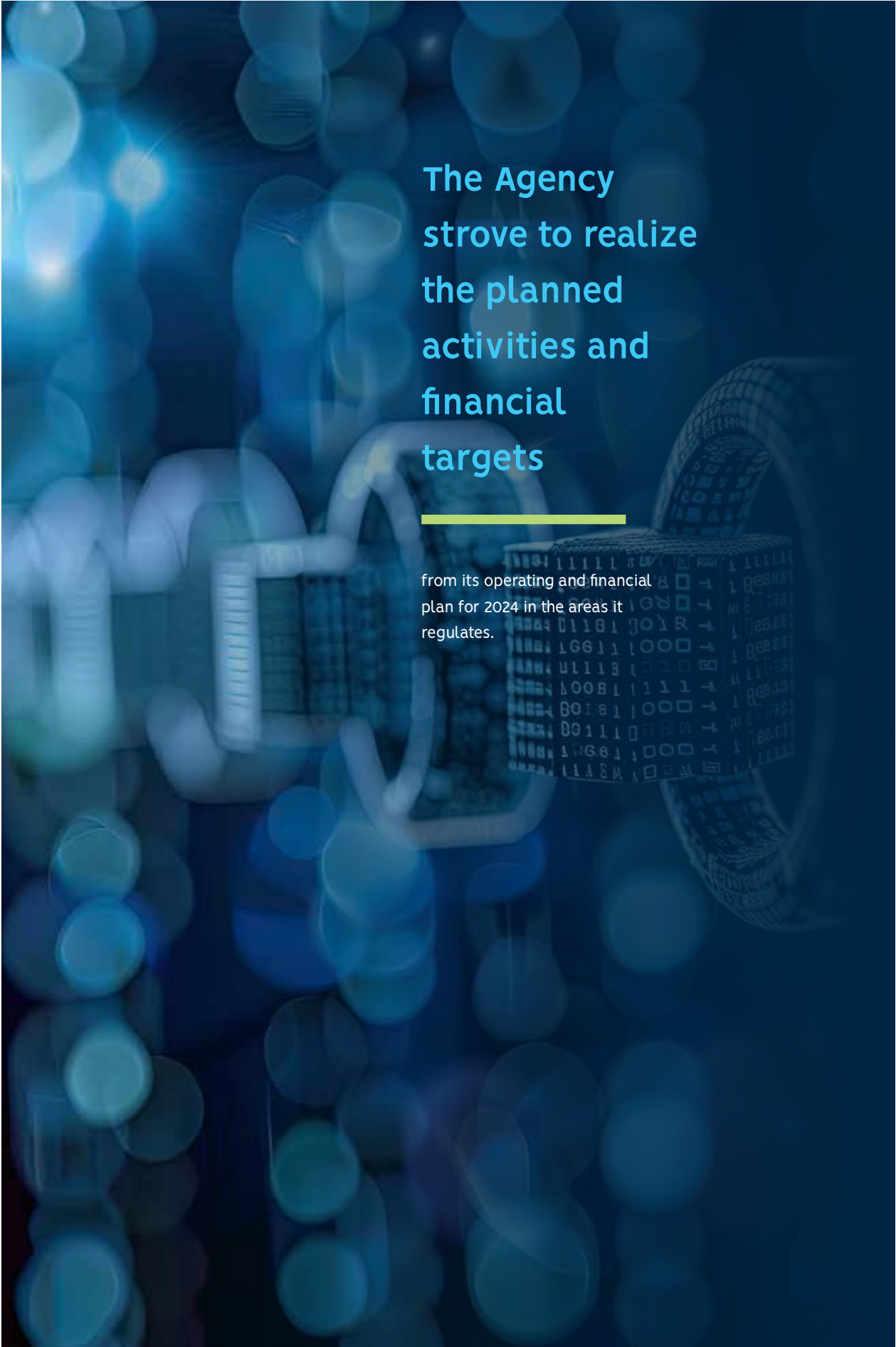
- an increase in revenue because of the use of radio frequencies in the value of EUR 1,138,080, i.e. 44.3%, primarily because of the increase in tariff by 32% and a higher number of points;
- a EUR 435,641, i.e., 22.9% increase in the revenue due to the tariff value increase;
- an increase in the revenue from payments for the use of numbering elements in the amount of EUR 144,460, i.e., 18.9% primarily due to the tariff value increase;
- an increase in the revenue from the provision of postal services of EUR 78,430, i.e., by 16.9%, due to the tariff value increase by 16.9%;

TABLE 16: REVENUE ON CASH FLOW BASIS FOR THE PERIOD FROM 1 JANUARY TO 31 DECEMBER 2024

	2023	2024	FP2024	Index 2024/ FP2025
Revenue from the provision of postal services	462.990	541.420	541.420	100,00
Revenue from fees for numbering resources	763.434	907.894	919.600	98,73
Revenue based on notifications	1.905.941	2.341.582	2.353.757	99,48
Revenue from frequencies	2.511.825	3.625.293	3.096.720	117,07
Revenue from railways	333.735	341.735	475.000	71,94
Revenue from media services	898.946	942.720	821.535	114,75
Revenue from the public auction administrative costs	4.220	0	0	
Revenue from performing activities for establishing the future DSC	5.005	55.550	0	
Revenue from sale of stickers banning the delivery of unaddressed mail to the mailbox	6.366	6.603	6.000	110,05
TOTAL OPERATING REVENUE (ADP code = part of 424)	6.892.462	8.762.797	8.214.032	106,68

Source: AKOS internal accounts

In 2024, the Agency realised revenues from the budget for the implementation of the tasks of the Digital Services Coordinator (AOP code = 404) for the first time, as well as revenues for the implementation of the EU project ENDURANCE (AOP code = part of 429).



The Agency strove to realize the planned activities and financial targets

from its operating and financial plan for 2024 in the areas it regulates.

2 EXPENSES

Based on cash flow, the Agency's expenses in 2024 totalled EUR 8,480,458, of which EUR 4,912,792 (57.9%) were expenses for salaries and other employee benefits, and associated social contributions paid by the employer, EUR 2,310,037 (27.3%) were expenses for the purchase of materials, goods, and services, and EUR 1,257,629 (14.8%) were capital expenditures.

The Agency's expenses in 2024 were EUR 732,136, i.e., 7.9% below the financial plan, especially in the following three categories of expenses: salaries and other labour costs with contributions, expenses for the purchase of goods and services for providing the public service.

2.1 SALARIES AND OTHER LABOUR COST

The Agency's labour costs were EUR 298,002, i.e. 5.7% lower than planned (ADP codes = 439 + 447), primarily due to the employment plan not being fully realised in accordance with the approved HR plan.

The average number of employees per working hours (ADP code for revenue and expenses = 894) stood at 100 for 2024, which is seven employees fewer than the Agency planned. Compared to the previous year, the average number of employees based on the man-hours worked in 2024 increased by seven public servants.

2.2 EXPENSES FOR GOODS AND SERVICES

The Agency's expenses for goods and services were EUR 492,883, i.e., 17.6% below the amount budgeted in the approved 2024 financial plan (ADP code = 453), primarily due to:

- lower expenses for office and general supplies and services in the amount of EUR 243,041, i.e. 30.9% (ADP code = 454), as the result of postponing some activities to the next year, and savings created by obtaining better offers for certain services, contracting certain services to a smaller extent than planned and not requiring others, and partially also because certain tasks were not realized in the scope that was planned, and this also affected the related costs;
- lower cost of energy, water, utilities and communications EUR 140,958, i.e., 48.5% (ADP code = 874), primarily because of the high prices when the plans were set;
- lower expenses for business trips in the amount of EUR 115,219, i.e., 41.4% (ADP code = 458), primarily due to participation in conferences, training sessions, workshops, and meetings online, due to events that were not held or those postponed to the next year, and due to non-attendance at events because of staff shortages;
- lower expenses for rents amounting to EUR 102,542, i.e. 41.6% (ADP code = 460), primarily due to the rental of a fewer parking spaces and no demonstrated need for the costs of hosting the Agency's equipment at Arnes, as the Agency was able to use them free of charge also in 2024, and because the ECC event was not held.
- higher expenditures for other operative expenses in the amount of EUR 112,734, i.e., 27.9% (ADP code = 463), primarily because of the payment resulting from the settlement.

Detailed notes on the structure of planned expenses of materials, goods and services and other expenses by the type of activity are given in the chapter Financial plan realization on accrual basis.

2.3 INVESTMENT EXPENSES

As part of capital expenditures the Agency planned investments into intangible and tangible assets in the amount of EUR 1,198,880. In 2024, the Agency completed the purchase of fixed assets amounting to EUR 1,243,979, i.e., 103.8% of the planned investments, and in terms of cash flow, it completed investment expenditures amounting to EUR 1,257,629, i.e., 104.9% of the planned investments.

The discrepancy between the cash flow and the accrual flow is due to payments made in 2024 for purchases carried out in 2023 amounting to EUR 20,575 and due to payments of VAT in January 2025 in the amount of EUR 6.925 for purchases made in December 2024.

In 2024 the Agency's investment expenses were EUR 58,749, i.e. 4.9% above its plan (ADP code = 470), primarily as the result of the following planned major investments:

- As part of maintenance and upgrades of ICT and user support (task ID 497) the Agency planned investments in the amount of EUR 520,284 for the purchase of appropriate hardware, and the completion of the enterprise resource planning system eAKOS (3rd and 4th phase). The completed purchases were in the amount of EUR 476,788. The delay in the development of the 3rd phase of the eAKOS ERP system, due to unforeseen testing issues, postponed the development of 4th phase to 2025. Part of the planned funds for 4th phase was therefore allocated to the purchase of equipment for employees to make it possible to work from home, which falls under the same task. The realization on the task (task ID 497) is higher than planned by EUR 43,496.
- As part of the activity Monitoring BB QoS (activity ID 302), the Agency budgeted EUR 180,000 for the purchase of equipment to increase the capacities of the AkosTestNet network and to purchase licensed software. The completed purchases were in the amount of EUR 169,067. The purchase of servers for AkosTestNet was lower due to a more favourable price obtained. The funds were allocated for the purchase of a drone, which was planned for 2025. Because of payments made in 2024 for purchases carried out in 2023 in the amount of EUR 20,575, the cash flow-based realisation on the task (task ID 302) is higher than planned by EUR 9,642.
- As part of the activity of upgrading and updating RSMS (activity ID 172), the Agency planned EUR 170,000 for the purchase of a field vehicle with upgrades. The purchases were fully completed in the amount of EUR 171,402. The realisation was above planned budgeted by EUR 1,402.
- The Agency budgeted EUR 45,750 in investments under infrastructure cost (activity ID 273), which were earmarked for furniture, bicycle storage and bicycles. The planned purchases of the bicycle storage and bicycles were not completed. The total amount of realisation was EUR 39,011. The realisation on the task (task ID 273) was below planned budgeted by EUR 6,739.
- As part of the task of Modernizing the TK data collection system (task ID 357), the agency planned EUR 282,846 for the implementation of the new data collection system with an upgrade. The budget for 2024 were realised in the amount of EUR 351,111. Of the planned amount for 2024, EUR 234,074 were realised. Besides these, the purchases planned for 2023 in the amount of EUR 117,037, were also realised in 2024. The realisation on task (task ID 357) was above planned budgeted by EUR 68,265;
- Within the task Simplified procedure for awarding in the 4 GHz and 28 GHz BWA bands for local use (Task ID 508), the Agency completed the development of a web interface for DARF applications, which was planned for 2025 due to a favourable price obtained. In 2024 the budget was realised in amount to EUR 36,600. The cash flow-based realisation is EUR 30,000. The web interface was planned for 2025 in the amount of EUR 100,000.

TABLE 17: SURPLUS CALCULATION BY FISCAL RULE

no.	Description	Amount
1.	Calculated surplus by cash flow	
1.1.	Revenue	9.252.692,48
1.2.	Expenses	8.480.458,93
1.3.	Surplus/deficit	772.233,55
2.	Calculated surplus by cash flow according to ZIPRS	
2.1.	Surplus (item no. 1.3)	772.233,55
2.2.	Liabilities R2 + R9 by balance sheet as at 31 December 2024	2.093.001,00
2.3.	Surplus/deficit	-1.320.767,45

In accordance with Act on the Implementation of the Budget of the Republic of Slovenia (ZIPRS) the Agency does not have a surplus by fiscal rule.

XVI DECLARATION REGARDING THE RESULT OF THE PUBLIC FINANCE INTERNAL AUDIT

DECLARATION REGARDING THE RESULT OF THE PUBLIC FINANCE INTERNAL AUDIT

at the AGENCY FOR COMMUNICATION NETWORKS AND SERVICES OF THE REPUBLIC OF SLOVENIA (name of the budget user)

I, the undersigned, am aware of the responsibility for establishing and constant improvement of the system of financial operations and internal controls and internal revision in accordance with Article 100 of the Public Finance Act with the intent to control the risks and ensure that the objectives of the operations and budget realization are met.

The system for internal supervision of public finance is designed in such a way that it provides reasonable, but not also absolute assurance of achieving the objectives: risks that general and special objectives of operation shall not be met are managed at a level that is still acceptable. It is based on a continuous process which makes it possible to define key risks, the probability of occurrence and impact of a certain risk on achieving the objectives, and assists in the risk being managed successfully, effectively and economically.

This assessment is the current state in the implementation of processes and procedures of internal supervision of public finance at the **Agency for Communication Networks and Services of the Republic of Slovenia**.

I give my assessment on the basis of:

- assessments of the internal audit service for the following: **ASSESSMENT OF THE APPROPRIATENESS OF SALARY CALCULATION AND PAYMENT**
- self-assessment of the heads of organizational units for the following areas: **ELECTRONIC COMMUNICATION REGULATION DIVISION, RADIO FREQUENCY SPECTRUM MANAGEMENT DIVISION, ELECTRONIC MEDIA DIVISION, DIVISION FOR RAILWAYS SERVICES MARKET REGULATION, DIVISION FOR POSTAL SERVICES MARKET REGULATION AND SUPERVISION, DIGITAL SERVICES DIVISION, DIVISION FOR RADIO FREQUENCY SPECTRUM MEASURING AND MONITORING, PUBLIC RELATIONS CONSULTANT, LEGAL AND GENERAL AFFAIRS DIVISION**

at the *Agency for Communication Networks and Services of the Republic of Slovenia* (name of the budget user)
the following is provided:

1. An appropriate control environment (the head of department selects one of the following options):

- a) across the whole operations,
- b) across most of its operations
- c) in individual areas of operations
- d) it is not established yet, but we started appropriate activities.
- e) it is not established yet, and we will start appropriate activities next year

☐
☒
☐
☐
☐

2. Risk management

2.1. The objectives are realistic and measurable, which means that the indicators for measuring the goal achievements are defined (the head of department selects one of the following options):

- a) across the whole operations, ☒
- b) across most of its operations ☐
- c) in individual areas of operations ☐
- d) they are not established yet, but we started appropriate activities. ☐
- e) they are not established yet, and we will start appropriate activities next year ☐

2.2. The risks for the objectives not being realized are defined and valued, a method for handling them has been defined (the head of department selects one of the following options):

- a) across the whole operations, ☐
- b) across most of its operations ☐
- c) in individual areas of operations , ☒
- d) they are not established yet, but we started appropriate activities. ☐
- e) they are not established yet, and we will start appropriate activities next year ☐

3. Risk-control-based system of internal controlling and control activities which bring the risk down to an acceptable level (the head of department selects one of the following options):

- a) across the whole operations, ☐
- b) across most of its operations ☒
- c) in individual areas of operations ☐
- d) it is not established yet, but we started appropriate activities. ☐
- e) it is not established yet, and we will start appropriate activities next year ☐

4. An appropriate system for informing and communications (the head of department selects one of the following options):

- a) across the whole operations, ☐
- b) across most of its operations ☒
- c) in individual areas of operations ☐
- d) it is not established yet, but we started appropriate activities. ☐
- e) it is not established yet, and we will start appropriate activities next year ☐

5. An appropriate supervision system, which also includes appropriate (in-house, shared, contractual) internal auditing service (the head of department selects one of the following options):

- a) across the whole operations, ☒
- b) across most of its operations ☐
- c) in individual areas of operations ☐
- d) it is not established yet, but we started appropriate activities. ☐
- e) it is not established yet, and we will start appropriate activities next year ☐

6. Internal auditing is ensured in accordance with the Rules on guidelines for coordinated behaviour of the system for internal supervision of public finance (the head of department selects one of the following options):

- a) with an in-house internal auditing department ☐
- b) with a shared internal auditing department ☐
- c) with an external contractor for internal auditing ☒
- d) I did not ensure any internal auditing ☐

ad b) State the title of the **shared internal auditing department**:

.....

State the seat and company registration number of the shared internal auditing department:

.....

Registration number:

ad c) State the title of the **external contractor for internal auditing:**

Auditor, Polona Gostan s.p.

State the seat and company registration number of the external contractor of internal auditing:

Golniška cesta 97, 4000 Kranj

Registration number:

3896196

Does the (approved) financial plan (budget) for the year to which the statement pertains exceed EUR 2.086 million



Date of last audit report of the external contractor for internal auditing is:

(day XY , month XY in year 20XY)

05 February 2025

ad d) **I did not ensure internal auditing because:**

.....

In 2024 (the year to which the statement pertains) I conducted the following significant improvements in internal auditing (list 1, 2 or 3 significant improvements):

- in the field of risk management in the execution of the operational and financial plan, the mandatory breakdown of major tasks within each department, including public procurement, on a quarterly basis, as well as more detailed quarterly reporting on achieved results, reasons for delays, measures to achieve the plan, future forecasts, etc.;
- in the field of efficiency risk management and the strict responsibility of each division for the Agency's regulatory competence, the reorganisation of the Agency and the reduction in the number of divisions (from 11 to 8);
- for risk management related to classified information, the adoption of a new Rules on the protection of classified information, the appointment of an authorised person in the field of classified information who ensures the correct handling thereof and the Agency's compliance with regulations on the protection of classified information;
- for the appropriate utilisation of student work and related risk management of the Agency's compliance with labour law regulations, the adoption of Instructions for hiring students for temporary and occasional student work at AKOS;
- in the field of risk management of the compliance of internal with the applicable legislation, the adoption of a new Rules on working hours, business hours and official hours of AKOS, Rules on amendments to the rules on internal organisation and job classification of AKOS in December, and the preparation of several internal acts, which were then adopted at the beginning of 2025;
- with the aim of ensuring risk management in the process of maintaining integrity, the preparation of an ethical code of the Agency, which was adopted and published at the beginning of January of the following year, and the regular operation of the integrity working group;
- in the field of business process risk management, the continuation of the operation of the working group for paperless operations and the digitalisation of the Agency's procedures, which identified processes that need to be optimised and automated;
- in relation to risk management related to filling vacancies and staff turnover, taking the measures to retain the Socially Responsible Employer certificate.

- in the field of information risk management, performing penetration tests and preparing the measures to reduce the identified risks;
- in the field of risk management of an unpredictable economic environment due to fluctuations in the value of points, the establishment of the first variant of a model for the long-term stabilisation of the value of points;
- in the field of risk management of ensuring required revenue the railway tariff is not approved, coordination meetings with the Ministry of Infrastructure and the Ministry of Environment, Climate and Energy regarding the tariff for the value of the point and the amount of the share for the charged user fee for the use of PRI for 2025; and the submission of letters or requests in May to the relevant ministries to obtain possible guidelines for the preparation of the Operational and Financial Plan for 2025.

In spite of the implemented improvements I find that there are still the following significant risks that I do not control in a sufficient scope (list 1, 2 or 3 significant risks and planned measures for their management):

- in relation to risk management of business processes – necessary updating of individual risk registers or preparation of a unified register for the Agency;
- in relation to risk management of errors in the processing of business trips and their accounting, as well as compliance with salary calculations, the optimisation and digitalisation of the business trip process and, consequently, part of the employee salary calculation procedure;
- in relation to risk management in the invoice processing procedure, the digitalisation of the procedure;
- in relation to risk management of compliance of internal rules with applicable legislation, the update of the Agency's internal rules.
- in relation to risk management in the implementation of internal projects, the introduction of a project office function and regular monthly reviews of project statuses;
- in the field of risk management of an unpredictable economic environment due to fluctuations in the value of points, the establishment of the amended model for the long-term stabilisation of the value of points;

*The head of the department or the operating body of the budget user: **Marko Mišmaš, MSc, director***



Financial Report



XVII FINANCIAL REPORT

1 LEGAL FRAMEWORK, FORM AND CONTENT OF THE REPORT

Letno poročilo je agencija pripravila ob upoštevanju zakonskih podlag ter vseh pripadajočih podzakonskih aktov in uredb z vsemi spremembami, ki urejajo pripravo in sestavo finančnih dokumentov:

- | The Agency has compiled this Annual Report in accordance with all the laws, rules and regulations, and their amendments that regulate the preparation and structure of financial documents:
- | Public Finance Act (Official Gazette of RS 11/11 – official consolidated text 4, 14/13 – amendments, 101/13, 13/18 and 76/23);
- | Accounting Act (Official Gazette of RS 23/99, 30/02 – ZJF-C and 114/06 – ZUE; hereinafter: ZR);
- | Rules on drawing up annual reports for the budget, budget spending units and other entities of public law (Official Gazette of RS 133/23);
- | Instructions on preparing the annual financial statement of state and municipalities budgets and on methodology for preparing a report on the achieved goals and results of direct and indirect budget users (Official Gazette of RS 12/01, 10/6, 8/07 in 102/10);
- | Decision on the establishment of the Agency for Communication Networks and Services of the Republic of Slovenia (Official Gazette of RS 41/13 and 66/17);
- | Slovenian Accounting Standards (Official Gazette of RS 118/05 and further).

In accordance with Accounting Act and Rules on the preparation of annual reports for the budget, budget users and other public bodies, this report comprises:

- | The financial report, which comprises financial statements (a balance sheet and statement of revenue and expense) and notes to financial statements;
- | The business report, which also includes the report on achieved goals and results and discloses the deviations and achievements from the reporting period i.e. the fulfilment of responsibilities and associated implementation of the financial plan (included in the first half of this annual report).

The content of information i.e. the accounting elements presented in these statements is defined by accounting regulations and standards. The Agency provided notes to the balance sheet and statement of revenue and expense in the form of mandatory appendices and statements, such as:

- | balance of and changes in intangible assets and tangible fixed assets,
- | balance of and changes in long-term financial investments and loans,
- | a statement of revenue and expense for specific users, categorized by type of activity,
- | a statement of revenue and expense for specific users compiled on cash basis,
- | statement of account of financial receivables and investments for specific users,
- | statement of account of financing for specific users.

The notes also comprise other accounting information that the Agency deems important for adequately and sufficiently disclosing the items on the balance sheet, and statement of revenue and expense.

The Agency obtained the approval of the Ministry of Digital Transformation to the Operational and Financial Plan of the Agency for Communication Networks and Services of the Republic of Slovenia for 2024 on 13 December 2023, with the exception of the tariffs and revenue plan for 2024 for railway transport, for which the 2023 tariff was used in 2024. The Government of the Republic of Slovenia issued its consent, on 14 December 2023 to the tariffs on the value of the point for payment based on notification, for payment for the use of radio frequencies, for payment

for the use of numbering resources, on the value of the point for payment for the provision of postal services, and on the value of the point based on the authorisation for the provision of television activities or entry in the official register of on-demand audiovisual media service providers or in the official register of video-sharing platform providers.

2 ACCOUNTING POLICIES

When compiling the financial statements and in its accounting the Agency followed the main goal of complying with regulations, as well as the goal of presenting the content of the financial statements and notes at the highest possible quality level. This means that it ensured, inter alia through appropriate internal accounting controls, that the financial statements are relevant, reliable, understandable and comparable. The Agency made the plans on the accrual basis.

2.1 INTANGIBLE ASSETS AND TANGIBLE FIXED ASSETS

The Agency initially recognized the intangible assets and tangible fixed assets at their original cost (historical cost). This cost comprises the purchase price, import and non-refundable purchase duties (e.g. VAT, which the Agency cannot claim as a deduction from the input tax, because it is not liable for VAT), and costs directly attributable to putting the asset in use (such as installation, commissioning, decommissioning costs, etc.). After the initial recognition these assets are carried at cost, less any amortization or depreciation in accordance with the selected cost model. The Agency records any subsequent cost related to tangible fixed assets as an increase of their historical cost, if it determines that the investment will increase future economic benefits compared to the initially estimated cost. The cost of repairs and maintenance for restoring or preserving future economic benefits are recognized as costs, i.e. operating expenses for the reporting period.

2.2 AMORTIZATION AND DEPRECIATION

Intangible assets and tangible fixed assets are amortized or depreciated by the Agency according to the straight-line method and in accordance with the Rules on the method and rates of depreciation of intangible fixed assets and tangible fixed assets. Since 2017, when the Court of Audit audited the Agency's operations, and in accordance with their recommendation, the Agency has in accordance with paragraph 2 of Article 44 of the Accounting Act, been recognising the total cost of amortisation and depreciation as revenue (before that the Agency put the total cost of amortisation and depreciation against liabilities for assets under management). This has led to a discrepancy in the assets for management, as the Agency included in the tariff also a part of the cost of amortisation and depreciation, and according to the Court of Audit policy it fully included it as a cost in the statement of revenue and expenditure. After receiving an opinion from the Ministry of Finance, the Agency changed how it recognises amortisation and depreciation for the year 2020. In 2023 the Agency recognises the part of the amortisation and depreciation of intangible assets that were purchased after 1 January 2017, or that was included in the tariffs against revenue (and recognizes the costs from this source), and for assets purchased before 1 January 2017 against the liabilities for intangible assets and fixed assets (for assets whose total historical cost was included in the tariff).

2.3 RECEIVABLES

The Agency recognizes receivables in amounts based on authentic accounting documents. Receivables are not impaired (with value adjustments), while receivable write-offs lower the obligation to the sources of these assets.

2.4 LIABILITIES

The Agency recognizes liabilities in amounts based on authentic accounting documents, and in the case of short-term operating liabilities, which represent the major part of total liabilities, prove the receipt of goods, materials, or services or work done, i.e. the charged costs.

2.5 REVENUE

The Agency recognizes revenue in amounts based on issued decisions determining fees on the basis of notifications, for using numbering resources, for using radio frequencies, for the provision of railway services, for the provision of media services, and for the provision of postal services, as well as bills issued for stickers banning delivery of unaddressed mail to mailboxes. Revenues are calculated by multiplying the number of points for a specific type of fees and the value of that point i.e. tariff, which is determined in the annual financial plan based on the planned structure and extent of expenses for that specific type of fees. The Act implementing Regulation (EU) on a Single Market For Digital Services (Official Gazette of the Republic of Slovenia, no. 30/24), adopted in 2024, has designated the Agency as the digital services coordinator. Consequently, it has recorded budgetary revenue for performing the tasks of the digital services coordinator for 2024. Revenues are broken down into operating, financial, and other revenues.

2.6 EXPENSES

The Agency recognises expenses on the basis of purchase prices, less discounts. If the discounts are not listed on the invoice, and are in a different document (i.e., an agreement), and these are significant amounts, they are returned during the year, and at the end of the year, the final calculation is made. Expenses also include the input VAT, as the Agency is not liable for VAT. Expenses are broken down into operating, financial, and other expenses.

3 FINANCIAL STATEMENTS WITH NOTES

The financial statement presented below is based on original cost. It is denominated in euros (EUR) and rounded to the nearest integer.

3.1 BALANCE SHEET

TABLE 18: BALANCE SHEET AS AT 31 DECEMBER 2024

in EUR (without cents)					
Classifying group accounts	Title of the group of accounts	Label for ADP	Amount		Index current year/previous year
			the year 2024	the year 2023	
1	2	3	4	5	6=4/5
	A) LONG-TERM ASSETS AND ASSETS UNDER MANAGEMENT (002+003+004+005+006+007+008+009+010+011)	001	4.891.838	4.343.535	112,6
00	INTANGIBLE ASSETS AND LONG-TERM DEFERRED COSTS AND ACCRUED REVENUE	002	2.220.336	1.740.181	127,6
01	AMORTIZATION OF INTANGIBLE ASSETS	003	1.482.603	1.363.045	108,8
02	PROPERTY	004	5.777.802	5.777.802	100,0
03	DEPRECIATION OF PROPERTY	005	2.914.197	2.742.149	106,3
04	EQUIPMENT AND OTHER TANGIBLE FIXED ASSETS	006	6.483.951	6.026.292	107,6
05	DEPRECIATION OF EQUIPMENT AND OTHER TANGIBLE FIXED ASSETS	007	5.193.451	5.095.546	101,9
06	LONG-TERM FINANCIAL INVESTMENTS	008	–	–	–
07	LONG-TERM LOANS GIVEN AND DEPOSITS	009	–	–	–
08	LONG-TERM OPERATING RECEIVABLES	010	–	–	–
09	RECEIVABLES FOR ASSETS UNDER MANAGEMENT	011	–	–	–
	B) SHORT-TERM ASSETS; EXCEPT FOR INVENTORY AND DEFERRED COST AND ACCRUED REVENUE (013+014+015+016+017+018+019+020+021+022)	012	6.152.642	5.154.506	119,4
10	CASH IN HAND AND EASILY REALIZABLE SECURITIES	013	–	–	–

11	DEPOSITS IN BANKS AND OTHER FINANCIAL INSTITUTIONS	014	5.477.091	4.705.487	116,4
12	SHORT-TERM TRADE RECEIVABLES	015	351.156	212.964	164,9
13	ADVANCES AND SECURITY DEPOSITS GIVEN	016	-	-	-
14	SHORT-TERM RECEIVABLES FROM USERS OF THE STANDARD CHART OF ACCOUNTS	017	26.271	9.202	285,5
15	SHORT-TERM FINANCIAL INVESTMENTS	018	-	-	-
16	SHORT-TERM FINANCIAL RECEIVABLES	019	-	-	-
17	OTHER SHORT-TERM RECEIVABLES	020	3.029	7.766	39,0
18	UNPAID EXPENSES	021	-	-	-
19	DEFERRED COSTS AND ACCRUED REVENUE	022	295.095	219.087	134,7
	C) INVENTORIES (024+025+026+027+028+029+030+031)	023	-	-	-
30	ACCOUNT PURCHASES OF MATERIALS	024	-	-	-
31	INVENTORIES OF MATERIALS	025	-	-	-
32	INVENTORIES OF SMALL TOOLS AND PACKAGING MATERIAL	026	-	-	-
33	UNFINISHED PRODUCTS AND SERVICES	027	-	-	-
34	PRODUCTS	028	-	-	-
35	ACCOUNT PURCHASES OF GOODS	029	-	-	-
36	INVENTORIES OF GOODS	030	-	-	-
37	OTHER INVENTORIES	031	-	-	-
	I. TOTAL ASSETS (001+012+023)	032	11.044.480	9.498.041	116,3
99	OFF-BALANCE SHEET ASSETS ACCOUNTS	033	-	-	-
	D) SHORT-TERM LIABILITIES AND ACCRUED COSTS AND DEFERRED REVENUE (035+036+037+038+039+040+041+042+043)	034	737.986	626.328	117,8
20	SHORT-TERM LIABILITIES FOR ADVANCES AND SECURITY DEPOSITS RECEIVED	035	-	-	-
21	SHORT-TERM LIABILITIES TO EMPLOYEES	036	399.458	331.186	120,6
22	SHORT-TERM LIABILITIES TO SUPPLIERS	037	138.545	202.408	68,4
23	OTHER SHORT-TERM OPERATING LIABILITIES	038	87.286	54.064	161,4
24	SHORT-TERM LIABILITIES TO USERS OF THE STANDARD CHART OF ACCOUNTS	039	6.223	3.360	185,2
25	SHORT-TERM LIABILITIES TO SOURCES OF FINANCING	040	-	-	-
26	SHORT-TERM FINANCIAL LIABILITIES	041	-	-	-
28	UNPAID REVENUE	042	-	-	-
29	ACCRUED COSTS AND DEFERRED REVENUE	043	106.474	35.310	301,5
	E) OWN FUNDS AND LONG-TERM LIABILITIES (045+046+047+048+049+050+051+052- 053+054+055+056+057+058-059)	044	10.306.494	8.871.713	116,2
90	GENERAL FUND	045	-	-	-
91	RESERVE FUND	046	-	-	-
92	LONG-TERM ACCRUED COSTS AND DEFERRED REVENUE	047	-	-	-
93	LONG-TERM PROVISIONS	048	-	-	-
940	RESTRICTED ASSETS IN PUBLIC FUNDS	049	-	-	-
9410	ASSETS IN OTHER LEGAL ENTITIES GOVERNED BY PUBLIC LAW, WHICH ARE OWNED BY THEM, FOR INTANGIBLE ASSETS AND TANGIBLE FIXED ASSETS	050	-	-	-
9411	ASSETS IN OTHER LEGAL ENTITIES GOVERNED BY PUBLIC LAW, WHICH ARE OWNED BY THEM, FOR FINANCIAL INVESTMENTS	051	-	-	-
9412	SURPLUS	052	-	-	-
9413	DEFICIT	053	-	-	-
96	LONG-TERM FINANCIAL LIABILITIES	054	-	-	-
97	OTHER LONG-TERM LIABILITIES	055	-	-	-
980	LIABILITIES FOR INTANGIBLE ASSETS AND TANGIBLE FIXED ASSETS	056	6.233.204	6.127.305	101,7

981	LIABILITIES FOR LONG-TERM FINANCIAL INVESTMENTS	057	-	-	-
985	SURPLUS	058	4.073.290	2.744.408	148,4
986	DEFICIT	059			-
	I. TOTAL LIABILITIES (034+044)	060	11.044.480	9.498.041	116,3
99	OFF-BALANCE SHEET LIABILITIES ACCOUNTS	061	-	-	-

The Agency's total assets as at 31 December 2024 amounted to EUR 11,044,480, which is EUR 1,546,439, i.e., 16.3% higher than at the end of 2023. The increase in the balance sheet total is primarily due to an increase in short-term assets on the asset side of the balance sheet and an increase in equity and long-term liabilities on the liability side of the balance sheet.

The structure of the Agency's assets is as follows:

- EUR 4,891,838, i.e., 44.3% of long-term assets (of which 84.9% are tangible fixed assets, 15.1% intangible assets and long-term deferred cost and accrued revenue);
- EUR 6,152,642, i.e., 55.7% of short-term assets (of which 6.2% are short-term receivables from customers and users of the standard chart of accounts, and other operating receivables, 89.0% are balance in the account, and 4.8% deferred cost and accrued revenue).

The structure of the Agency's liabilities is as follows:

- EUR 10,306,494, i.e., 93.3% of long-term liabilities, which comprise liabilities for assets under management (of which 69.1% are for intangible assets and tangible fixed assets, and 30.9% are surplus);
- EUR 737,986, i.e., 6.7% of short-term liabilities (of which 31.5% are short-term trade liabilities and other operating liabilities, 54.1% short-term liabilities to employees, and 14.4% accrued cost and deferred revenue).

The Agency's off-balance sheet accounts record, in accordance with Article 72 of the Regulation on the National Chart of Accounts, only information on possible (potential) liabilities that are not shown as of 31 December 2024.

3.1.1 LONG-TERM ASSETS AND ASSETS UNDER MANAGEMENT

The balance of the Agency's long-term assets and assets under its management on 31 December 2024 comprises the balance of intangible assets and tangible fixed assets recorded at their book value, and the balance of long-term operating receivables.

LONG-TERM DEFERRED COST AND ACCRUED REVENUE, INTANGIBLE ASSETS AND TANGIBLE FIXED ASSETS

The class of accounts 0 (group of accounts from 00 to 05) comprises long-term deferred cost and accrued revenue, intangible assets, and tangible fixed assets received from the relevant ministry when the Agency was established as an independent legal entity, and additional assets purchased in the following years and until 31 December 2024.

Intangible assets comprise mostly software and different software licenses, as well as long-term deferred cost. The historical cost of intangible assets and long-term deferred costs (ADP code = 002) increased by a total of EUR 480,155 in 2024 compared to the year before. Changes in the cost are primarily the result of:

- reduced long-term deferred costs of the advanced payment for software leases in the value of EUR 11,622;
- an increase in the purchase cost due to the procurement of additional software and licenses, as listed in Table 19 in the total value of EUR 493,658;
- a decrease in the original cost due to write-offs of old, broken and useless equipment in the total value of EUR 1,881 based in the decision of the inventory commission.



TABLE 19: MAJOR INVESTMENTS IN INTANGIBLE FIXED ASSETS

classifying group accounts	Task ID	value in EUR	type of investment
003 long-term assets	302 Monitoring QoS BB	2.439 €	Software for the drone
	357 Modernisation of the data collection system	351.111 €	Portal for communication with obligated parties
	497 Maintenance and upgrade of the ICT system and user support	103.508 €	eAKOS ERP system (3rd phase), upgrade to the system for registering working time and upgrade to SRC AppX
	508 Simplified procedure – RK	36.600 €	Online portal to simplify issuing decisions
total		493.658 €	

The amortization amount for intangible assets (ADP code = 003) increased by a total of EUR 119,558 in 2024 compared to the year before:

- an increase in the accumulated depreciation due to depreciation at the prescribed rates in the total amount of EUR 121,439.
- a decrease due to write-offs of old, broken and useless equipment in the total value of EUR 1,881 based in the decision of the inventory commission.

Tangible fixed assets comprise:

- property (building and agricultural land, offices, radio supervision and measurement stations, etc.);
- equipment and other tangible fixed assets (telecommunication and audiovisual equipment, computer hardware, equipment for heating and cooling premises, printing and copying equipment, security equipment, office furniture and equipment, vans, cars, etc.).

The historical cost of property (ADP code = 004) did not change in 2024 compared to the year before.

The accumulated depreciation of property (ADP code = 005) increased by a total of EUR 172,048 in 2024 compared to the year before due to depreciation at prescribed depreciation rates.

The original cost of equipment and other tangible fixed assets (ADP code = 006) increased by a total of EUR 457,659 in 2024 compared to the year before. Changes in the historical cost are the result of:

- an increase in the historical cost resulting primarily from the purchase of telecommunication and computer equipment, as detailed in Table 20, in the total amount of EUR 750,321;
- a decrease in the original cost due to write-offs of old, broken and useless equipment in the total value of EUR 292,662 based in the decision of the inventory commission.

TABLE 20: MAJOR INVESTMENTS IN TANGIBLE FIXED ASSETS – EQUIPMENT AND SMALL TOOLS

classifying group accounts	Task ID	value in EUR	type of investment
040 equipment	172 Upgrade and updates to the RMMS	171.402 €	purchase of an off-road vehicle, server and laptops, spectrum analyser and measuring equipment
	273 Infrastructure costs	39.011 €	sit-stand desk, new fire alarm system, alarms (2x) and fire-proof filing cabinet
	302 Monitoring QoS BB	166.628 €	AkosTestNet servers, VIAVIA ONA 800 mobile instruments (2x), upgrade for existing instruments VIAVI MTS5800, a drone in other computer and communication equipment
	497 Maintenance and upgrade of the ICT system and user support	373.280 €	purchase of a server, network equipment, computers and computer equipment and phones
total		750.321 €	

The accumulated depreciation losses for equipment and other tangible fixed assets (ADP code = 007) increased by a total of EUR 97,905 in 2024 compared to the year before. Changes in the accumulated depreciation are the result of:

- a decrease due to write-offs of old, broken and useless equipment in the total value of EUR 292,662 based in the decision of the inventory commission.
- an increase due to amortization at prescribed amortization rates in the total value of EUR 390,161;
- an increase of write-off values from writing off fixed assets with a non-write-off value of EUR 406.

The Agency purchased EUR 728,665 worth of new intangible and tangible fixed assets in 2024. These purchases were financed from the surplus generated in preceding years.

The Agency uses tangible and non-tangible assets for its activities, and as at 31 December 2022 their total book value is 0, and whose total original cost is EUR 5,047,763.

LONG-TERM OPERATING RECEIVABLES

The Agency's long-term operating receivables from the group of accounts 08 (ADP code = 016) has a balance of 0.

3.1.2 SHORT-TERM ASSETS EXCEPT FOR INVENTORY AND DEFERRED COST AND ACCRUED REVENUE

The Agency's short-term assets on 31 December 2024 comprise deposits in banks and other financial institutions, short-term trade receivables, and receivables due from users of the standard chart of accounts, advances paid, securities given, and other short-term receivables and deferred cost and accrued revenue.

DEPOSITS IN BANKS AND OTHER FINANCIAL INSTITUTIONS

The Agency's cash deposits on the sub-account of the treasury single account at the Public Payments Administration of the Republic of Slovenia, through which the Agency's payment transactions are made, amounted to EUR 5,477,091 on 31 December 2024 (ADP code = 014). The Agency's deposits increased by EUR 771,604, i.e., 16,4% compared to the year before.

SHORT-TERM TRADE RECEIVABLES

The Agency's short-term trade receivables recorded under the group of accounts 12 (ADP code = 015) comprise receivables from issued decisions on determining the fees on the basis of notifications, for using numbering resources, for using radio frequencies, for the provision of media services, for the provision of railway services and for the provision of postal services, and bills issued for stickers banning delivery of unaddressed mail to mailboxes in

the total amount of EUR 429,881, and allowances for impairments in the total amount of EUR 78,725. Compared to 31 December 2023, the net amount of these liabilities increased by EUR 138,192, i.e., 64.9%. Receivables were reconciled with customers as of 31 December 2024, on reconciliation forms.

The total amount of trade receivables is EUR 243,794, the amount of overdue receivables of up to 30 days is EUR 78,552, overdue receivables from 30 days to 60 days is EUR 174, overdue receivables from 60 days to 90 days is EUR 6,868, overdue receivables from 90 days to 180 days is EUR 24,016, overdue receivables from 180 days to 270 days is EUR 1,846, overdue receivables from 270 days to 365 days is EUR 1,170, and overdue receivables above one year is EUR 73,461. The Agency does not know why the payments have not been settled.

The Agency made allowances in the amount of EUR 5.862 for all overdue, unpaid, unsecured, or unimpaired claims that were overdue for over a year as at 31 December 2024, or for receivables for which there is reasonable doubt that they will be repaid, and recorded them as revaluatory operating expenses (ADP code for the Statement of Revenue and Expense = 886).

The Agency wrote off receivables from debtors against which bankruptcy proceedings were concluded or which were deleted from the court register and have no legal successor – acquirer from whom the Agency could demand these receivables, and for receivables after a completed compulsory settlement and for a receivable after a completed personal bankruptcy. It also wrote off receivable whose enforcement was completed based on a decision from FURS because of expiration or economic feasibility. Based on Article 47 of the Rules on accounting the Agency wrote off receivables to foreign legal persons which were not put into enforcement because of economic feasibility and have expired and are unenforceable, and the Agency also does not issue decision to these legal persons. The total value of write-offs is EUR 727.

In 2024 the Agency issued overdue reminders and reminders about pending debt collection to debtors, and carried out e-collection proceedings based on authentic documents through the eFURS system. In 2024 the Agency received payments from dunned, previously impaired receivables in the amount of EUR 5,654.

ADVANCES AND SECURITY DEPOSITS GIVEN

The Agency's advances and security deposits under the group of accounts 13 (ADP code = 016) has a balance of 0.

SHORT-TERM RECEIVABLES FROM USERS OF THE STANDARD CHART OF ACCOUNTS

The Agency's short-term receivables from users of the standard chart of accounts under group of accounts 14 (ADP code = 017) comprise receivables from direct and indirect users of state and municipalities budgets based on issued decisions on determining the fees and tasks from the activities for establishing the digital services coordinator and interest claims to treasury single account in the amount of EUR 26,271. Compared to 31 December 2023, the net amount of these liabilities increased by EUR 17,069, i.e., 185.5%. Receivables were reconciled with users of the standard chart of accounts as of 31 December 2024, on reconciliation forms.

OTHER SHORT-TERM RECEIVABLES

The Agency's other short-term receivables under the group of accounts 17 (ADP code = 020) comprise mostly receivables from the Health Insurance Institute of Slovenia for refunding the sick leave pay for sick leaves exceeding 30 days and claims to employees in the total amount of EUR 3,029. Compared to 31 December 2023, the net amount of these liabilities decreased by EUR 4,737, i.e. 61.0%.

DEFERRED COSTS AND ACCRUED REVENUE

The Agency's deferred cost and accrued revenue under the group of accounts 19 (ADP code = 022) comprise short-term deferred cost and accrued revenue in the total amount of EUR 295,095. Short-term deferred cost comprise mostly the cost of upfront fees for maintenance and support of network equipment, for IT support and software upgrades for an online application for recording, saving, archiving, and analysing television channels and audiovisual services on demand, fees for accessing databases, membership fees, insurance premiums, subscription fees, etc., all paid in advance for the period after the reporting date in the total amount of EUR 236,445 and EUR 58,650 of accrued revenue for uninvoiced or unbilled decisions on the amount of fee for which an audit has been launched. Compared to 31 December 2023, the net amount of these liabilities increased by EUR 76,008, i.e., 34.7%.

3.1.3 SHORT-TERM LIABILITIES AND ACCRUED COST AND DEFERRED REVENUE

The Agency's short-term liabilities and accrued cost and deferred revenue as of 31 December 2024 comprise short-term liabilities to employees, suppliers and users of the standard chart of accounts, other short-term liabilities, and accrued cost and deferred revenue.

SHORT-TERM LIABILITIES FOR ADVANCES AND SECURITY DEPOSITS RECEIVED

The Agency's short-term liabilities for advances and security deposits received under the group of accounts 20 (ADP code = 035) has a balance of zero as at 31 December 2021.

SHORT-TERM LIABILITIES TO EMPLOYEES

The Agency's short-term liabilities to employees under the group of accounts 21 (ADP code = 036) comprise liabilities to employees for salaries for December 2024 and regular employee bonuses for the final quarter of 2024 in the total amount of EUR 399,458 (of which liabilities for net salaries and compensations amount to EUR 265,848 and liabilities for social security contributions and taxes amount to EUR 133,610), all of which are not yet due. Compared to 31 December 2023, the net amount of these liabilities decreased by EUR 68,272, i.e. 20.6%. The December salaries were paid out in January 2025. Employee bonuses for the final quarter of 2024 were paid in February 2025.

SHORT-TERM LIABILITIES TO SUPPLIERS

The Agency's short-term liabilities to suppliers under the group of accounts 22 (ADP code = 037) comprise liabilities to domestic suppliers in the amount of EUR 138,545. All the liabilities not past due, and were settled within the legal deadline in 2025. The Agency generally settles its liabilities to suppliers within 30 days of receiving the e-invoice. Compared to 31 December 2023, the net amount of these liabilities decreased by EUR 63,863 or 31.6%. Receivables were reconciled with vendors as of 31 December 2023, on reconciliation forms.

OTHER SHORT-TERM OPERATING LIABILITIES

The Agency's other short-term operating liabilities under the group of accounts 23 (ADP code = 038) comprise mostly liabilities for social contributions paid by the employer and deductions from salaries for December salaries in the amount of EUR 63,682, and for VAT for goods and services purchased from EU states according to the December VAT return in the amount of EUR 23,604, for the total amount of EUR 87,286. These liabilities are fully not due yet. Compared to 31 December 2023 the amount of these liabilities decreased by EUR 33,222, i.e., 61.4%.

SHORT-TERM LIABILITIES TO USERS OF THE STANDARD CHART OF ACCOUNTS

The Agency's short-term liabilities towards users of the standard chart of accounts under group of accounts 24 (ADP code = 039) comprise liabilities towards direct and indirect users of state and municipalities budgets for purchases of goods, materials or services in the amount of EUR 6,223. All liabilities were not due yet on 31 December 2024. Compared to 31 December 2023, the net amount of these liabilities decreased by EUR 2,863, i.e. 85.2%.

ACCRUED COST AND DEFERRED REVENUE

The Agency's accrued cost and deferred revenue under the group of accounts 29 (ADP code = 043) comprise the accrued cost of external audit services for 2024, and invoices not yet received for services rendered in 2024 in the total value of EUR 29,260, and short-term deferred revenue for the EU project, totalling EUR 77,214. Compared to 31 December 2023, the net amount of these liabilities increased by EUR 71,164, i.e., 201.5%.

3.1.4 OWN RESOURCES AND LONG-TERM LIABILITIES

The Agency's own resources and long-term liabilities (ADP code = 044) comprise liabilities for assets under management in the amount of EUR 10,306,494, which comprise:

liabilities for intangible assets and tangible fixed assets under the group of accounts 980 (ADP code = 056) in the amount of EUR 6,233,204 increased in 2024 year-on-year by EUR 105,899, i.e., 1.7%. New purchase of intangible and tangible fixed assets in the total value of EUR 1,243,979 and received of sale of a vehicle in the value of EUR 8,915 increased the value of assets under management by EUR 1,252,894. The amortisation and depreciation of intangible and tangible fixed assets purchased before 1 January 2017 in the value of EUR 241,883, and the use of assets for purchasing new intangible and tangible fixed assets in the value of EUR 905,112 decreased the value of

assets under management.

surplus under the group of accounts 985 (ADP code = 058) amounted to EUR 4,073,290 which is an increase of EUR 1,328,882, i.e., 48.4%, compared to the year before, representing unallocated surplus from the current year in the amount of EUR 1,667,749 (ADP code for the Revenue and Expenditure Account = 891), and a surplus from the past years in the amount of EUR 2,405,541, which is used in accordance with the resolution of the Government of the Republic of Slovenia when setting the tariff.

Compared to 31 December 2023 the net amount of these liabilities increased by EUR 1,434,781, i.e., 16.3%, mainly because of the achieved surplus in 2024 in the amount of EUR 1,667,749.

3.2 STATEMENT OF REVENUE AND EXPENSE

Under the Rules on breaking down and measuring revenues and expenses of legal entities under public law the Agency, as a specific user of the standard chart of accounts, recognizes revenue and expenses and compiles separate financial statements:

- on the accrual basis;
- on cash basis for the purpose of monitoring the changes in revenue and expenses, in which case revenue and expenses are recorded not when the cash is earned or costs incurred, but when cash or its equivalent is received or paid (including potential set offs).

In a separate Statement of Revenue and Expense for specific users, categorized by type of activity, the Agency presents only revenue and expenses from providing a public service, while the revenue and expenses from selling goods or services in the market are not recorded, because the Agency does not provide commercial services.

The Statement of Revenue and Expense for specific users compiled on a cash basis is an obligatory note to the mandatory Statement of Revenue and Expenses for specific users (account statement), which the Agency takes into account when drawing up its financial plan and which is presented in the context of disclosing its implementation (section Implementation of the Financial Plan).

The Agency's Financial Plan is drawn up on accrual basis, and comprises all planned revenue and expenses (cost) based on the time or period when the business event occurs. Secondly, the Agency applied the cash principle.

When recognizing revenue and expenses, the Agency complied with the rules on cash basis accounting and not the rules from the accounting standards. Due to different regulatory bases, data from both accounts cannot be directly compared. With the purpose of allowing at least limited comparison and providing a higher quality level of disclosures, all the major permanent and temporary discrepancies between the two accounts are explained below:

1. Permanent discrepancies are primarily associated with outflows for capital expenditure (ADP code for the Statement of Revenue and Expense compiled on cash basis = 470), which are not recorded in the account statement of revenue and expenditure, and the revaluation operating expenses from the impairment of receivables (ADP code for the Statement of Revenue and Expense = 879), and the costs of amortisation and depreciation (ADP code for Statement of Revenue and Expense = 879), which are only an account category.
2. Temporary discrepancies are associated primarily with the dynamics of cash inflows and outflows, i.e. delays in the payment of more significant revenue and expense items between the years.

In recording on an accrual basis for the year 2022 the Agency created a surplus in the value of EUR 463,415, while in the statement on the cash flow basis, i.e. statement of revenue and expense it created a deficit of EUR 1,488,821.

The statement of revenue and expense is EUR 895,515 lower than the account statement because of:

- the difference in revenue: the statement of revenue and expense has EUR 80,737 more revenue;
- the difference in expense: the statement of revenue and expense has EUR 814,778 higher expenses;

Higher revenues recorded in the statement of revenue and expense at EUR 80,737 and higher expenses for goods

and services recorded in the statement of revenue and expense at EUR 83,806 are primarily due to delays in the payment of receivables and liabilities of the Agency.

Investment costs which are in the statement of revenue and expense are EUR 815,864 higher than the amortisation and depreciation in the account statement.

Labour costs differ between the statements because the salary for December 2023 is included in the account statement for 2024, while the statement of revenue and expense for 2024 includes the salary for December 2024. The statement of revenue and expense has lower labour costs by EUR 78,624.

The statement of revenue and expense does not have any revaluation receivables, which are included in the account statement, and amount to EUR 6,268.

TABLE 21: STATEMENT OF REVENUE AND EXPENSE FOR THE PERIOD FROM 1 JANUARY TO 31 DECEMBER 2024

in EUR (without cents)					
Classify– Account subgroup title ing sub- groups of accounts		Label for ADP	Amount		index current year/previous year
			Current year	Previous year	
1	2	3	4	5	6=4/5
	A) OPERATING REVENUE (861+862-863+864)	860	9.103.809	6.696.212	136,0
760	REVENUE FROM THE SALE OF PRODUCTS AND SERVICES	861	9.097.157	6.689.979	136,0
	INCREASE IN THE VALUE OF INVENTORIES AND WORK IN PROGRESS	862	–	–	
	DECREASE IN THE VALUE OF INVENTORIES AND WORK IN PROGRESS	863	–	–	
761	REVENUE FROM THE SALE OF GOODS AND MATERIALS	864	6.652	6.233	106,7
762	B) FINANCIAL INCOME	865	174.903	127.650	137,0
763	C) OTHER REVENUE	866	54.717	181.000	30,2
	D) REVALUATION OPERATING REVENUE (868+869)	867	–	–	
part of 764	REVENUE FROM THE SALE OF OPERATING FIXED ASSETS	868	–	–	
part of 764	OTHER REVALUATION OPERATING REVENUE	869	–	–	
	E) TOTAL REVENUE (860+865+866+867)	870	9.333.429	7.004.862	133,2
	F) COST OF GOODS, MATERIALS, AND SERVICES (872+873+874)	871	2.126.578	1.923.043	110,6
part of 466	ORIGINAL COST OF MATERIALS AND GOODS SOLD	872	–	–	
460	COST OF MATERIALS	873	169.642	214.571	79,1
461	COST OF SERVICES	874	1.956.936	1.708.472	114,5
	G) LABOR COSTS (876+877+878)	875	4.991.416	4.599.900	108,5
part of 464	SALARIES AND WAGE COMPENSATIONS	876	3.862.527	3.532.685	109,3
part of 464	SOCIAL SECURITY CONTRIBUTIONS PAID BY THE EMPLOYER	877	689.265	627.817	109,8
part of 464	OTHER LABOR COSTS	878	439.624	439.398	100,1
462	H) DEPRECIATION AND AMORTIZATION	879	441.765	286.546	154,2
463	I) PROVISIONS	880	–	–	

465	J) OTHER COSTS	881	-	-	
467	K) FINANCIAL EXPENSES	882			
468	L) OTHER EXPENSES	883	99.653	-	
	M) REVALUATION OPERATING EXPENSES (885+886)	884	6.268	8.915	70,3
part of 469	EXPENSES FROM THE SALE OF OPERATING FIXED ASSETS	885	-	-	
part of 469	OTHER REVALUATION OPERATING EXPENSES	886	6.268	8.915	70,3
	N) TOTAL EXPENSES (871+875+879+880+881+882+883+884)	887	7.665.680	6.818.404	112,4
	O) SURPLUS (870-887)	888	1.667.749	186.458	894,4
	P) DEFICIT (887-870)	889			
part of 80	Corporate income tax	890	-	-	
part of 80	Surplus for the period after income tax (888-890)	891	1.667.749	186.458	894,4
part of 80	Deficit for the period after income tax (889+890) or (890-888)	892			
	Surplus from preceding years allocated to covering expenses from the accounting period	893	-	-	
	Average number of employees based on the hours worked in the accounting period (whole number)	894	100	93	107,5
	Months of operation	895	12	12	100,0

The statement shows that the Agency recorded EUR 9,333,429 in revenue and EUR 7,665,680 in expenses between 1 January 2024 and 31 December 2024, which is a surplus of EUR 1,667,749. Notes regarding the changes in separate revenue and expense items that resulted in the deficit are presented below. The Agency shall spend the surplus from 2024 in accordance with the decision from its founder.

3.2.1 REVENUES

The Agency generated EUR 9,333,429 in revenue in 2024, of which EUR 9,103,809 was operating revenue (97.5%), EUR 174,903 was financial revenue, and EUR 54,717 was other revenue (0.6%) .

OPERATING REVENUE

The Agency generates operating revenue by charging different fees used for covering the expenses incurred in carrying out different activities linked to the implementation of relevant laws, and the proportionate share of expenses of the Agency's common services. Operating revenue comprises:

- revenue based on notifications, charged based on ZEKom-2;
- revenue from fees for using radio frequencies, charged based on ZEKom-2 and the General act on the method for calculating fees for radio frequency usage;
- revenue from fees for using numbering resources, charged based on ZEKom-2 and the General act on the method of calculating the charges for the use of numbering elements;
- revenue from postal service providers and the sale of stickers banning delivery of unaddressed mail to mailboxes, charged based on ZPSto-2 and the Rules on the method for calculating fees for providing postal services;
- revenue from railway service providers, charged based on the Railway Transport Act;
- revenue from fees based on television broadcasting licenses and/or entries in the official register (revenue from the media), charged based on ZAvMS and Rules on the method of calculating fees based on television broadcasting licenses or entry in the official register of on-demand audiovisual media services providers.

Revenue is calculated by multiplying the number of points for a specific type of fees and the value of that point i.e.

tariff, which is determined in the annual financial plan based on the planned structure and extent of expenses for that specific type of fee. When calculating the fees for 2024, the Agency applied the 2024 tariffs approved by the Government of the Republic of Slovenia in December 2023:

- tariff for annual fees charged based on notifications, with the value of one point set at EUR 2.13;
- tariff for annual fees for using numbering resources, with the value of one point set at EUR 1.52;
- tariff for annual fees for using radio frequencies, with the value of one point set at EUR 0.66;
- tariff for annual fees based on television broadcasting licenses or entry into the official register of on-demand audiovisual media service providers, with the value of one point set at EUR 1.07;
- tariff for annual fees for providing postal services, with the value of one point set at EUR 10.70;
- The Government of the Republic of Slovenia did not approve the tariffs for railway traffic provision for the year 2024. The tariff set for 2023 was used in 2024; tariff setting the value of the point, and specifying the share of the charged usage charge for public railway infrastructure to be paid for the operations of the railway regulator at EUR 18.4 and 0.98%, respectively.

In 2024 the Agency has recorded budgetary revenue for performing the tasks of the digital services coordinator for the first time.

The Agency calculated the fees in 2024 by applying the economic premises from the 2024 financial plan, primarily applying the accrual principle, and planning the payments based on the cost of the Agency's operations.

TABLE 22: AGENCY'S OPERATING REVENUE

	2023	2024
Revenue from the provision of postal services	462.990	541.420
Revenue from fees for numbering resources	774.186	912.810
Revenue based on notifications	1.883.388	2.472.331
Revenue from frequencies	2.518.818	3.748.097
Revenue from railway services	337.735	337.735
Revenue from media services	706.654	847.504
Revenue from performing activities for establishing the future DSC	6.208	54.347
Revenue from performing the DSC tasks	–	178.692
Revenue from the public auction administrative costs	–	4.220
Revenue from sale of stickers banning the delivery of unaddressed mail to the mailbox	6.233	6.653
TOTAL OPERATING REVENUE (ADP code = 860)	6.696.212	9.103.809

Source: AKOS internal accounts

The presented structure shows that in its regular operations, the Agency generated the largest share of its revenues from charging for the use of radio frequencies (41.2%), followed by fees based on notifications (27.1%), numbering space (10.0%), media services (9.3%), postal services, including AKOS stickers (6.2%), railway services (3.7%), budgetary revenue for performing the tasks of the digital services coordinator (1.9%), and from activities related to establishing a future digital services coordinator (0.6%).

The Agency's operating revenue in 2024 increased by EUR 2,407,497, i.e., 36.0%, compared to the year before. Significant changes are primarily the result of:

- an increase in revenue from the use of radio frequencies in the value of EUR 1,229,279, i.e. 48.8%, primarily because of the increase in tariff by 32% and a higher number of points;
- an increase in the revenue based on notifications of EUR 588,943, i.e., by 31.3%, primarily due to the tariff being raised by 19.0%, and a higher number of points;
- an increase in revenue from media service provision in the value of EUR 140,850, i.e., by 2.3%, because of the in-

crease in tariff by 16,3%;

an increase in the revenue from numbering elements of EUR 138,624, i.e., by 17.9%, because of the increase in tariff by 16.9%;

an increase in the revenue from the provision of postal services of EUR 78,430, i.e., by 16.9%, due to the tariff value increase by 16.9%;

an increase in revenue from activities related to establishing a future digital services coordinator of EUR 48,139, as the tasks were performed for a longer period of time in 2024 than in 2023;

an increase in revenue from administrative costs of the public auction, which amounted to EUR 4,220, which there were recognised in 2024;

an increase in revenue in the amount of EUR 178,692 for financing DSC from the budget, which were not present in 2023.

FINANCIAL REVENUE

The Agency's financial revenue in 2023 amounted to EUR 174,903 (ADP code = 865) and comprised primarily interest on time deposits with the treasury single account. The total amount of financial revenue decreased by EUR 47,253 compared to 2023.

OTHER REVENUE AND REVALUATION OPERATING REVENUE

The Agency's other income in 2024 amounted to EUR 54,717 (ADP code = 866) from revenue for past years, reimbursements on audits and legal costs, collected already impaired receivables, reimbursements for costs of business trips in the EU, and the revenue for performing an EU project. The Agency's other revenue decreased by EUR 126,283 compared to 2023, especially because of revenue from completed audits in 2023.

3.2.2 EXPENSES

The Agency's total expenses in 2024 amounted to EUR 7,665,680, of which EUR 2,126,578 represented the cost of purchasing goods, materials and services (27.7% of total expenses), EUR 4,991,416 were labour cost (65.1% total expenses), EUR 441,765 amortisation and depreciation (5.8% of total expenses), EUR 99,653 in other expenses (1.3%), and EUR 6,268 revaluation expenses (0.1% total expenses).

TABLE 23: STATEMENT OF REVENUE AND EXPENSE BY FINANCING SOURCE FOR THE PERIOD FROM 1 JANUARY 2024 TO 31 DECEMBER 2020

Yearly expenditure by financing source	2024
from the provision of postal services	489.585
from fees for numbering resources	826.334
from notifications	1.867.650
from frequencies	3.056.489
from railway services	390.063
from media services	805.379
from performing activities for establishing the future DSC	42.146
from performing DSC task	187.248
EU project	786
Total (ADP code=887)	7.665.680

Source: AKOS internal accounts

The Agency's expenses in 2024 increased by EUR 847,276, i.e., by 12.4% compared to the year before. Changes are primarily the result of:

an increase in the labour cost (ADP code = 875) of EUR 391,516, i.e., by 8.5%, especially primarily due to salary increases in the public sector in 2024;

an increase in the cost of purchasing goods, materials and services (ADP code = 871) of EUR 203,535, i.e., by 10.6%, especially because of the increase of other operative expenses;

- a EUR 155,219, i.e., 54.2% increase in amortisation and depreciation cost (ADP code = 879), because major assets were purchased in 2023 and 2024;
- a EUR 99,653 increase in other expenses (ADP code = 883) from obligations following a settlement.

LABOUR COST

The Agency's labour costs comprise the cost of salaries and compensations, and the associated social contributions paid by the employer, including expenses for the collective voluntary pension insurance for public servants, contributions for the disabled and accrued pension and disability insurance to the Pension and Disability Insurance Institute of Slovenia for older workers, meal, commuting, and holiday allowances, and other employee benefits, such as jubilee benefits, severance pay, bonuses, etc., for 100 public servants on average, based on work hours. The Agency's labour costs rose by EUR 391,516, i.e., by 8.5% in 2024 compared to the year before. This rise was primarily caused by the increase in the number of employees. Compared to the previous year, the average number of employees based on the hours worked in 2024 increased by 7 public servants. The increase is also due to the rise in the value of salary grades as of 1 June 2024, as well as the regular advancement of employees, which also affects allowances linked to the basic salary. The increase was also influenced by higher holiday allowance, seniority bonus, and higher reimbursements.

COSTS OF GOODS, MATERIAL AND SERVICES

The costs of goods, materials, and services recorded by the Agency comprise the costs of purchasing office and general supplies and services (mostly costs of contractors), purchasing special supplies and services, purchasing energy, water, and utility and communication services, purchasing materials for regular maintenance, transportation costs and services, cost of business trips, operating rents and leases, and other operating expenses.

TABLE 24: COST OF GOODS, MATERIALS, AND SERVICES

CLASSIFICATION BY ACCOUNT	REVENUE AND EXPENDITURE ACCOUNT FOR SPECIFIC USERS	ADP code	2023	2024
			1	2
F) COST OF GOODS, MATERIALS, AND SERVICES (872+873+874)		871	1.923.043	2.126.578
del 466 ORIGINAL COST OF MATERIALS AND GOODS SOLD		872	–	–
460 COST OF MATERIALS		873	214.571	169.642
4600 Office and general supplies			194.686	148.999
4601 Special supplies			19.885	20.643
461 COST OF SERVICES		874	1.708.472	1.956.936
4610 Office and general services			405.949	465.757
4611 Special services			28.564	35.879
4612 Energy, water, utility services, communications			109.015	109.719
4613 Transportation costs and services			25.927	31.535
4614 Expenses for business trips			145.286	161.383
4615 Regular maintenance			635.260	590.884
4616 Operating rent and lease fees			135.884	145.632
4617 Other Operating Expenses			222.587	416.147

Source: AKOS internal accounts

The structure of these costs shows that the major part of these expenses was spent on office and general supplies and services (28.9%) and materials and services for regular maintenance (27.8%), and on other operating expenses (19.6%), and the remainder on business trips (7.6%), rents and leases (6.8%), purchases of energy, water, and utility and communication services (5.2%), purchases of special materials and services (2.6%), and transportation costs and services (1.5%).

COST OF OFFICE AND GENERAL SUPPLIES AND SERVICES

The major share of these costs comprise the cost of contracting experts for preparing studies, models, analyses, impact assessments, background papers, and cost of accounting, auditing and legal services, etc. for high-budget projects, such as:

- | an independent review and calculation of WACC as at 31 December 2023 in accordance with the CAPM and RAB models for performing the universal postal service in the Sector for market regulation and supervision of postal services (ID=115 Regulation of separate accounting);
- | conducting the analysis of technological trends in the postal sector (ID=116 Competition promotion);
- | conducting an internal audit on verifying the appropriateness of billing and salary payment (ID=494 Bookkeeping, accounting and financial operations, and coordination of public orders);
- | conducting an external audit of the financial statement and the annual report (ID = Bookkeeping, accounting and financial operations, and coordination of public orders);
- | conducting an external audit of the information technology audit (ID = Bookkeeping, accounting and financial operations, and coordination of public orders);
- | access to databases in the Department for regulation of telecommunications (ID=474 Market regulation);
- | analyses of received data on television programming content, and for electronic measurements of the viewership of individual content and whole television programme, and the technical, expert and consultation support in using the software for data processing, the purchase of the study on trends of monitoring TV programming in RS (ID=267 TV and AVMS activity monitoring);
- | access to Slovenian radio stations' recordings with analysing software, and data on broadcast music (ID=270 RA activity monitoring);
- | a survey of ratings of radio stations in the Republic of Slovenia (ID=272 Radio activity a regulation);
- | the commission of a database on the use of electronic and online media for the needs of the Strategy for the development of radio and television stations in Slovenia for the period 2025–2029 (ID=506 Media literacy);
- | an assessment of the methodology and results of measuring the quality of letter mail delivery in domestic traffic for 2023 (ID=107 Regulation and supervision of universal service);
- | an assessment of the methodology and results of measuring the quality of parcel delivery in domestic traffic for 2023 (ID=107 Regulation and supervision of universal service);
- | a survey on consumer online purchasing habits with an emphasis on the delivery of goods (ID=108 Situation on the postal services market);
- | a comparative analysis of postal services providers' prices and delivery periods in cross-border delivery of parcels (ID = 108 State of the postal services market);
- | a survey on user satisfaction/needs with postal services – general and business public (ID=108 Situation on the postal services market);
- | a survey and an analysis of the demand of end users for higher speeds of internet access and e-content for 2024 (ID = 486 Analysis of retail and wholesale prices of broadband connections in RS);
- | a survey and analysis of the state of monthly household expenditure on electronic communications services in Slovenia for 2024 (ID=486 Analysis of retail and wholesale prices of broadband connections in Slovenia);
- | maintenance, upgrades and design of the online GIS viewer (ID = 387 Mapping);
- | representation in national and foreign courts;
- | market regulation and following regulatory activities in other EU members (access to databases about the measures put in place, and European Commission's commentaries) on the postal, media and electronic communications markets;
- | translations of the Agency's texts, publications in the Official Gazette, cleaning and security services for buildings and premises, reception services, and electricity costs.

Compared to 2023, the total amount of the group of expenses decreased by EUR 14,121, i.e., by 2.4%.

COST OF SPECIAL SUPPLIES AND SERVICES

Costs of special supplies and services comprise mostly the cost of media monitoring services (clipping) and the STA information service, cost of storing documentary materials with accompanying costs and small items, tools and devices for maintenance, and the costs related to obtaining the Socially Responsible Employer certificate. Compared to 2023, the total amount of the group of expenses decreased by 16.7%, i.e., by EUR 8,073.

COSTS OF ENERGY, WATER, UTILITY SERVICES AND COMMUNICATIONS

The majority of these costs were utility costs (heating, water, utility services, etc.) for the offices and radio supervision and measurement stations, while other costs comprised fixed and mobile communication services, postal services, and insurance premiums for buildings, equipment, and vehicles. Compared to 2023, the total amount of the group of expenses decreased by EUR 704, i.e., by 0.6%.

TRANSPORTATION COST AND SERVICES

These costs comprise cost of fuel and lubricants for company vehicles (measurement and other vehicles), cost of their maintenance, registration fees, and other transportation costs. Compared to 2023, the total amount of the group of expenses decreased by EUR 5,608, i.e., by 21.6%.

COSTS OF BUSINESS TRIPS

The cost of business trips primarily comprises the costs of purchasing airline tickets, as well as other costs of transport in Slovenia and abroad, accommodation costs, per diems for business trips in Slovenia and abroad, and any other costs related to business trips. When calculating employee reimbursements the Agency complied with the Decree on the reimbursement of costs for traveling abroad on official mission, and the collective agreement for the public sector. Compared to 2023, the value of these expenses increased by EUR 16,097, i.e., by 11.1%, primarily due to the increase in transportation and service costs and the increase in the number of employees.

REGULAR MAINTENANCE COSTS

The major share of these costs are costs of managing and maintaining the offices and equipment at Stegne 7, regular maintenance of communication equipment and computers, and maintenance of the radio supervision and measurement system (buildings, equipment and devices). Compared to 2023, regular maintenance costs decreased by EUR 44,376, i.e., 7.0%, both due to smaller scope of maintenance work on the building, and due to lower cost of communication equipment and computer maintenance.

TABLE 25: REGULAR MAINTENANCE COST REALISATION

Task ID	value in EUR	type of maintenance
171 RMMS maintenance	16.265	Regular software maintenance and maintenance and upgrades to the radio monitoring and measurement system
180 Broadcasting Council	220	website maintenance
267 TV and AVMS activity – monitoring	9.699	Regular maintenance of the software for monitoring TV programming content
273 Infrastructure costs	176.208	The majority share of the maintenance expenses are costs related to the management, maintenance and insurance of the office building at Stegne 7
277 TC SEC	1.259	website maintenance
279 Website maintenance and 481 RF Spectrum management	20.209	current maintenance and updates to AKOS websites
302 Monitoring QoS BB	44.139	maintenance and updates of the Akos TestNet technology platform and other equipment
354 Publications on planned construction	2.617	maintenance of the portal
387 Mapping	449	database licenses SQL
506 Media literacy	16.462	maintenance of the Media literacy portal
497 Maintenance and upgrade of the ICT system and user support	303.357	The majority share of the expenses are costs of software maintenance, network device maintenance, annual fees, ensuring support and maintenance of the virtual server environment and the archiving systems
total	590.884	

Source: AKOS internal accounts

RENT AND OPERATING LEASE COST

These costs mostly comprise rents for offices and conference rooms, rents for land on which radio supervision and measurement stations are located. Compared to 2023, the total amount of the group of expenses increased by EUR 9,748, i.e., by 7.1%, mainly because of the smaller number of leased parking spaces.

OTHER OPERATING EXPENSES

The majority of costs in this group comprises the cost of expert and general educational and training courses, the costs of monthly bonuses including benefits and travel expenses for the members of councils (the Agency Council, Electronic Communications Council, and Broadcasting Council), and cost of membership fees for international and Slovenian organizations, fees for the use of building land, costs of student work, and other operating costs. Compared to 2023 the total amount of other operative expenses decreased by EUR 193,560, i.e., by 87%, primarily due to the organisation of the BEREC plenary meeting and the organisation of the CN ERGP, higher realised costs of registration fees for training, and a greater need for student work.

3.2.3 REALIZATION OF THE FINANCIAL PLAN ON THE ACCRUAL BASIS

The Agency's Financial Plan for 2024 was prepared in accordance with the Agency's operational plan for 2024, and comprises all planned revenue and expenses (costs) based on the time or period when the business event occurred. The unspent (accumulated) depreciation and amortization of fixed assets, procured after 1 January 2017, is thus also recorded as a source of investments in new fixed assets, in addition to the surplus from the preceding years.

The Agency worked towards realizing the planned activities and financial targets from its operating and financial plans for 2024 in the areas it regulates, however its financial operations were affected by certain new facts and circumstances, as well as unforeseen measures affecting both revenue and expenses. The Agency generated 112.8% of the planned revenue, with its spending amounting to 90.7% of the plan.

The higher realisation of planned revenues was influenced by the realisation of a larger number of points from frequencies and notifications, the realisation of unplanned budgetary revenues for the implementation of the tasks of the Digital Services Coordinator, and higher financial revenues than planned.

Discrepancies in expenses were especially the result of:

- | the Agency being unable to realise the scope of new employment in line with the human resources plan, which is the result of the Agency's uncompetitive salary policy and its limitations in rewarding policy compared to the private sector, as well as the lack of appropriate human resources with specific knowledge and experience from the fields regulated and supervised by the Agency;
- | lower prices of fuels than planned, because the prices of fuels were very high when preparing the financial plan;
- | smaller scope of the costs of services than planned due to obtaining better offers for services and consequent savings;
- | a smaller scope of realised maintenance work as part of the maintenance of business premises, as a contract with an external contractor was not concluded for several months;
- | a smaller scope of realised Information and Communication Technology maintenance costs due to optimisation of services;
- | a smaller scope of business travel and training due to participation in conferences, seminars, workshops, and online training;
- | a smaller scope of leases due to leasing fewer parking spaces, the ECC event not being organised, and no demonstrated need for the costs of hosting the Agency's equipment at Arnes, as the Agency could use them free of charge;
- | some tasks moving into the next year.

TABLE 26: STATEMENT OF REVENUE AND EXPENSE FOR THE PERIOD FROM 1 JANUARY TO 31 DECEMBER 2024

Classifying subgroups of accounts	Account subgroup title	Label for ADP	Amount		
			Current year	FP2024	Index current year/2024 FP 6=4/5
1	2	3	4	5	6=4/5
	A) OPERATING REVENUE (861+862-863+864)"	860	9.103.809	8.214.032	110,8
760	REVENUE FROM THE SALE OF PRODUCTS AND SERVICES	861	9.097.157	8.208.032	110,8
	INCREASE IN THE VALUE OF INVENTORIES AND WORK IN PROGRESS	862	-	-	
	DECREASE IN THE VALUE OF INVENTORIES AND WORK IN PROGRESS	863	-	-	
761	REVENUE FROM THE SALE OF GOODS AND MATERIALS	864	6.652	6.000	110,9
762	B) FINANCIAL INCOME	865	174.903	10.000	1749,0
763	C) OTHER REVENUE	866	54.717	49.450	110,7
	D) REVALUATION OPERATING REVENUE (868+869)	867	-	-	
part of 764	REVENUE FROM THE SALE OF OPERATING FIXED ASSETS	868	-	-	
part of 764	OTHER REVALUATION OPERATING REVENUE	869	-	-	
	E) TOTAL REVENUE (860+865+866+867)	870	9.333.429	8.273.482	112,8
	F) COST OF GOODS, MATERIALS, AND SERVICES (872+873+874)	871	2.126.578	2.802.920	75,9
part of 466	ORIGINAL COST OF MATERIALS AND GOODS SOLD	872	-	-	
460	COST OF MATERIALS	873	169.642	261.630	64,8
461	COST OF SERVICES	874	1.956.936	2.541.290	77,0
	G) LABOR COSTS (876+877+878)	875	4.991.416	5.210.794	95,8
part of 464	SALARIES AND WAGE COMPENSATIONS	876	3.862.527	4.037.188	95,7
part of 464	SOCIAL SECURITY CONTRIBUTIONS PAID BY THE EMPLOYER	877	689.265	649.987	106,0
part of 464	OTHER LABOR COSTS	878	439.624	523.619	84,0
462	H) DEPRECIATION AND AMORTIZATION	879	441.765	429.195	102,9
463	I) PROVISIONS	880	-	-	
465	J) OTHER COSTS	881	-	-	
467	K) FINANCIAL EXPENSES	882	-	-	
468	L) OTHER EXPENSES	883	99.653	-	
	M) REVALUATION OPERATING EXPENSES (885+886)	884	6.268	7.000	89,5
part of 469	EXPENSES FROM THE SALE OF OPERATING FIXED ASSETS	885	-	-	
part of 469	OTHER REVALUATION OPERATING EXPENSES	886	6.268	7.000	89,5
	N) TOTAL EXPENSES (871+875+879+880+881+882+883+884)	887	7.665.680	8.449.909	90,7
	O) SURPLUS (870-887)	888	1.667.749		
	P) DEFICIT (887-870)	889		176.427	
part of 80	Corporate income tax	890	-	-	
part of 80	Surplus for the period after income tax (888-890)	891	1.667.749	-	
part of 80	Deficit for the period after income tax (889+890) or (890-888)	892		176.427	
	Surplus from preceding years allocated to covering expenses from the accounting period	893	-	-	
	Average number of employees based on the hours worked in the accounting period (whole number)	894	100	107	93,5
	Months of operation	895	12	12	100,0

REVENUE

In 2024 the Agency generated a total of EUR 9,333,429 in revenue. Compared to the financial plan, the Agency generated total revenues that were EUR 1,059,947, i.e., 12.8% higher than originally planned. Within this, the Agency particularly notes an increase of EUR 889,777, i.e., 10.8% in total revenues from regular operations, an increase of EUR 164,903 in financial revenues. These following are the main reasons for significant deviations:

- EUR 137,265, i.e. 28.9% decrease in revenue from railway services because the tariff for 2024 was not approved;
- EUR 651,377, i.e., 21.0% higher revenue from radio frequencies, because of achieving a higher number of points, as detailed under chapter XV Implementation of the Financial Plan;
- EUR 178,692 higher revenues from the budget for performing activities of the digital services coordinator, which were not planned for 2024;
- EUR 118,574, i.e., 5.0% higher revenue from payments based on notifications because of achieving a higher number of points, as detailed under chapter XV Implementation of the Financial Plan;
- EUR 54,347 higher revenues from performing activities related to establishing a future digital services coordinator, which were not planned for the year 2024;
- EUR 25,969, i.e., 3.2% higher revenue from performing media services because of achieving a higher number of points;

Other categories of revenue from the sale of goods and services as part of providing public services and other revenue did not significantly change compared to the year before.

TABLE 27: COMPARISON OF REALIZED AND PLANNED OPERATING REVENUE ON ACCRUAL BASIS

	2024	2024 FP	Index 2024/2024 FP
Revenue from the provision of postal services	541.420	541.420	100,0
Revenue from fees for numbering resources	912.810	919.600	99,3
Revenue based on notifications	2.472.331	2.353.757	105,0
Revenue from frequencies	3.748.097	3.096.720	121,0
Revenue from railway services	337.735	475.000	71,1
Revenue from media services	847.504	821.535	103,2
Revenue from performing activities for establishing the future DSC	54.347	–	
Revenue from performing the DSC tasks	178.692	–	
Revenue from the public auction administrative costs	4.220	–	
Revenue from sale of stickers banning the delivery of unaddressed mail to the mailbox	6.653	6.000	110,9
TOTAL OPERATING REVENUE (ADP code = 860)	9.103.809	8.214.032	110,8

Source: AKOS internal accounts

EXPENSES

The Agency's expenses in 2024 amounted to EUR 7,665,680, which is EUR 784,229, i.e., 9.3% less than planned, especially because lower goods, material and services and lower labour costs.

WAGES AND SALARIES

The Agency's labour costs were EUR 219,378, i.e., 4.2% lower than planned (ADP codes = 875), primarily due to only partially realized hiring plan, and not replacing the employees who left the Agency (retirement and employment contract termination). The average number of employees per working hours stood at 100 for 2024, which is 7 employees, i.e., 6.5% fewer than the Agency planned in its human resources plan for 2024, as it planned to have 107 employees.

COSTS OF GOODS, MATERIAL AND SERVICES

The Agency's expenses for goods and services were EUR 676,342, i.e., 24.1% below the plan (ADP code = 871), primarily due to EUR 584,354, i.e., 23.0% lower cost of services (ADP code = 874).

TABLE 28: COMPARISON OF REALIZED AND PLANNED COST OF GOODS, MATERIALS AND SERVICES (ACCRUAL PRINCIPLE)

CLASSIFICATION BY ACCOUNT	REVENUE AND EXPENDITURE ACCOUNT FOR SPECIFIC USERS	ADP code	2024	2024 FP	INDEX 2024/2024 FP
			1	2	3=1/2
F) COST OF GOODS, MATERIALS, AND SERVICES (872+873+874)		871	2.126.578	2.802.920	75,9
part of 466	ORIGINAL COST OF MATERIALS AND GOODS SOLD	872	–	–	
460	COST OF MATERIALS	873	169.642	261.630	64,8
4600	Office and general supplies		148.999	251.630	59,2
4601	Special supplies		20.643	10.000	206,4
461	COST OF SERVICES	874	1.956.936	2.541.290	77,0
4610	Office and general services		465.757	667.654	69,8
4611	Special services		35.879	64.000	56,1
4612	Energy, water, utility services, communications		109.719	156.513	70,1
4613	Transportation costs and services		31.535	43.300	72,8
4614	Expenses for business trips		161.383	278.590	57,9
4615	Regular maintenance		590.884	679.855	86,9
4616	Operating rent and lease fees		145.632	246.600	59,1
4617	Other Operating Expenses		416.147	404.778	102,8

Source: AKOS internal accounts

In relation to unrealized expenses for office and general supplies and services in the total amount of EUR 304,528, i.e., 33.1% of the plan (groups of accounts no. 4600/4610), the Agency would like to highlight:

- lower costs because more favourable agreements than planned (access to databases, analyses and research and surveys);
- lower costs of publishing in the Official Gazette of the Republic of Slovenia, because of fewer publications than planned;
- lower costs due to demonstrated less need for HR consulting, consulting on the more complex public procurement, and legal services;
- lower costs as certain tasks were not completed because the tariff was not approved;
- lower costs of office supplies and toners due to the transition to digital operations;
- lower costs due to the delay in activities related to the preparation of internal rules;
- lower costs due to the delay in the procurement of directional signs due to reorganisation;
- a lower price for electricity than expected;
- unspent funds for payments of court procedure costs, as court cases were not heard;

In addition to the lower cost of office and general supplies and services, expenses for goods and services were also different than planned, due to:

- lower cost of special materials and services (group account items 4601/4611) in the total value of EUR 17.478, i.e., 23.6% (ADP code = 874 and 874) because of planned costs of moving the archives, which were not needed, because the existing vendor obtained the public order;
- lower cost of energy, water, utilities and communications in the amount of EUR 46,794, i.e., 29.2% (ADP code = 874) because of high prices of fuels and energy when the plans were made;

- lower cost of transport and transport services (group account item 4613) in the value of EUR 11,765, i.e., 27.2% (ADP code = 874) because fuel prices did not rise as expected;
- lower cost of business trips (group account item 4614) in the value of EUR 117,207, i.e., 42.1% (ADP code = 874). Business trips were realized to a lesser extent primarily due to participation in conferences, meetings, and trainings online, as well as due to unorganized events or those postponed to the next year, and due to staff shortages and the consequent overlapping of commitments with conferences;
- lower regular maintenance costs (account group item 4615) amounting to EUR 88,971, i.e. 13.1% (AOP code = 874), primarily due to a smaller scope of realised maintenance work as part of the maintenance of business premises, as no agreement was concluded with an external contractor, and due to lower costs for the maintenance of information and communication technology as a result of service optimisation;
- lower expenses for rents and leases (leasing) (account group item 4616) in the amount of EUR 100,968, i.e. 40.9% (AOP code = 460), especially due to a smaller scope of leases for parking spaces and no demonstrated need for the costs of hosting the Agency's equipment at Arnes, as the Agency was able to use them free of charge also in 2024, and because the ECC event was not held;
- higher cost of other operative expenses (group account item 4617) in the value of EUR 11,639, i.e., 2.8% (ADP code = 874).

DEPRECIATION AND AMORTIZATION

Because of the changes to the accounting policy of recognising amortisation and depreciation in 2024, the Agency only recognised the amortisation and depreciation for fixed assets purchased after 1 January 2017 in the amount of EUR 441.765 (ADP code = 879), while it recognised amortisation and depreciation of fixed assets purchased after 1 January 2017 against liabilities for intangible assets and fixed assets. The Agency realised EUR 12,570 more in expenses, i.e. 2.9% more than the initially planned value of depreciation costs.

OTHER EXPENSES

In 2024 the Agency created EUR 99.653 expenses other expenses (ADP code = 883), because of the concluded settlement, which was not planned.

REVALUATION OPERATING EXPENSES

In 2024 the Agency created EUR 6.268 expenses from revaluation operating expenses (ADP code = 884), i.e., 89.5% above plans. The Agency formed corrections for values of claims for all unpaid, unimpaired claims for which there is reasonable doubt that they will be repaid.

Below the Agency provides separate statements of revenues and expenditures for the tariff part, the budgetary part (for the implementation of the tasks of the DSC), and for the EU project.

TABLE 29: STATEMENT OF REVENUE AND EXPENSE – TARIFF PART

Classifying subgroups of accounts	Account subgroup title	Label for ADP	Amount		
			Current year	FP2024	Index current year/2024 FP
1	2	3	4	5	6=4/5
	A) OPERATING REVENUE (861+862-863+864)	860	8.925.117	8.214.032	108,7
760	REVENUE FROM THE SALE OF PRODUCTS AND SERVICES	861	8.918.465	8.208.032	108,7
	INCREASE IN THE VALUE OF INVENTORIES AND WORK IN PROGRESS	862	-	-	
	DECREASE IN THE VALUE OF INVENTORIES AND WORK IN PROGRESS	863	-	-	
761	REVENUE FROM THE SALE OF GOODS AND MATERIALS	864	6.652	6.000	110,9
762	B) FINANCIAL INCOME	865	174.903	10.000	1749,0
763	C) OTHER REVENUE	866	45.375	49.450	91,8
	D) REVALUATION OPERATING REVENUE (868+869)	867	-	-	
part of 764	REVENUE FROM THE SALE OF OPERATING FIXED ASSETS	868	-	-	
part of 764	OTHER REVALUATION OPERATING REVENUE	869	-	-	
	E) TOTAL REVENUE (860+865+866+867)	870	9.145.395	8.273.482	110,5
	F) COST OF GOODS, MATERIALS, AND SERVICES (872+873+874)	871	2.071.829	2.802.920	73,9
part of 466	ORIGINAL COST OF MATERIALS AND GOODS SOLD	872	-	-	
460	COST OF MATERIALS	873	165.379	261.630	63,2
461	COST OF SERVICES	874	1.906.450	2.541.290	75,0
	G) LABOR COSTS (876+877+878)	875	4.865.716	5.210.794	93,4
part of 464	SALARIES AND WAGE COMPENSATIONS	876	3.765.567	4.037.188	93,3
part of 464	SOCIAL SECURITY CONTRIBUTIONS PAID BY THE EMPLOYER	877	680.301	649.987	104,7
part of 464	OTHER LABOR COSTS	878	419.848	523.619	80,2
462	H) DEPRECIATION AND AMORTIZATION	879	434.378	429.195	101,2
463	I) PROVISIONS	880	-	-	
465	J) OTHER COSTS	881	-	-	
467	K) FINANCIAL EXPENSES	882	-	-	
468	L) OTHER EXPENSES	883	99.653	-	
	M) REVALUATION OPERATING EXPENSES (885+886)	884	6.070	7.000	86,7
part of 469	EXPENSES FROM THE SALE OF OPERATING FIXED ASSETS	885	-	-	
part of 469	OTHER REVALUATION OPERATING EXPENSES	886	6.070	7.000	86,7
	N) TOTAL EXPENSES (871+875+879+880+881+882+883+884)	887	7.477.646	8.449.909	88,5
	O) SURPLUS (870-887)	888	1.667.749		
	P) DEFICIT (887-870)	889		176.427	
part of 80	Corporate income tax	890	-	-	
part of 80	Surplus for the period after income tax (888-890)	891	1.667.749	-	
part of 80	Deficit for the period after income tax (889+890) or (890-888)	892		176.427	
	Surplus from preceding years allocated to covering expenses from the accounting period	893	-	-	
	Average number of employees based on the hours worked in the accounting period (whole number)	894	100	107	93,5
	Months of operation	895	12	12	100,0

TABLE 30: STATEMENT OF REVENUE AND EXPENSE – BUDGET PART (DSC)

in EUR (without cents)

Classifying subgroups of accounts	Account subgroup title	Label for ADP	Amount		
			Current year	FP2024	Index current year/2024 FP
1	2	3	4	5	6=4/5
	A) OPERATING REVENUE (861+862–863+864)	860	178.692	–	
760	REVENUE FROM THE SALE OF PRODUCTS AND SERVICES	861	178.692	–	
	INCREASE IN THE VALUE OF INVENTORIES AND WORK IN PROGRESS	862	–	–	
	DECREASE IN THE VALUE OF INVENTORIES AND WORK IN PROGRESS	863	–	–	
761	REVENUE FROM THE SALE OF GOODS AND MATERIALS	864	–	–	
762	B) FINANCIAL INCOME	865	–	–	
763	C) OTHER REVENUE	866	8.556	–	
	D) REVALUATION OPERATING REVENUE (868+869)	867	–	–	
part of 764	REVENUE FROM THE SALE OF OPERATING FIXED ASSETS	868	–	–	
part of 764	OTHER REVALUATION OPERATING REVENUE	869	–	–	
	E) TOTAL REVENUE (860+865+866+867)	870	187.248	–	
	F) COST OF GOODS, MATERIALS, AND SERVICES (872+873+874)	871	53.963	–	
part of 466	ORIGINAL COST OF MATERIALS AND GOODS SOLD	872	–	–	
460	COST OF MATERIALS	873	4.263	–	
461	COST OF SERVICES	874	49.700	–	
	G) LABOR COSTS (876+877+878)	875	125.700	–	
part of 464	SALARIES AND WAGE COMPENSATIONS	876	96.960	–	
part of 464	SOCIAL SECURITY CONTRIBUTIONS PAID BY THE EMPLOYER	877	8.964	–	
part of 464	OTHER LABOR COSTS	878	19.776	–	
462	H) DEPRECIATION AND AMORTIZATION	879	7.387	–	
463	I) PROVISIONS	880	–	–	
465	J) OTHER COSTS	881	–	–	
467	K) FINANCIAL EXPENSES	882	–	–	
468	L) OTHER EXPENSES	883	–	–	
	M) REVALUATION OPERATING EXPENSES (885+886)	884	198	–	
part of 469	EXPENSES FROM THE SALE OF OPERATING FIXED ASSETS	885	–	–	
part of 469	OTHER REVALUATION OPERATING EXPENSES	886	198	–	
	N) TOTAL EXPENSES (871+875+879+880+881+882+883+884)	887	187.248	–	
	O) SURPLUS (870–887)	888	–		
	P) DEFICIT (887–870)	889		–	

part of 80	Corporate income tax	890	-	-
part of 80	Surplus for the period after income tax (888-890)	891	-	-
part of 80	Deficit for the period after income tax (889+890) or (890-888)	892		-
	Surplus from preceding years allocated to covering expenses from the accounting period	893	-	-
	Average number of employees based on the hours worked in the accounting period (whole number)	894	3	
	Months of operation	895	8	

TABLE 31: STATEMENT OF REVENUE AND EXPENSE – EU PROJECT

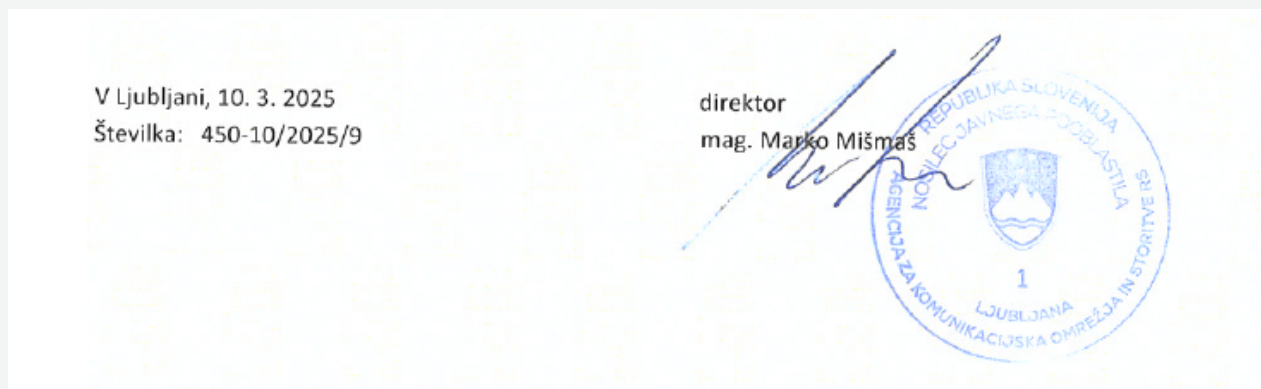
in EUR (without cents)

Classifying subgroups of accounts	Account subgroup title	Label for ADP	Amount		
			Current year	FP2024	Index current year/2024 FP
1	2	3	4	5	6=4/5
	A) OPERATING REVENUE (861+862-863+864)	860	-	-	
760	REVENUE FROM THE SALE OF PRODUCTS AND SERVICES	861	-	-	
	INCREASE IN THE VALUE OF INVENTORIES AND WORK IN PROGRESS	862	-	-	
	DECREASE IN THE VALUE OF INVENTORIES AND WORK IN PROGRESS	863	-	-	
761	REVENUE FROM THE SALE OF GOODS AND MATERIALS	864	-	-	
762	B) FINANCIAL INCOME	865	-	-	
763	C) OTHER REVENUE	866	786	-	
	D) REVALUATION OPERATING REVENUE (868+869)	867	-	-	
part of 764	REVENUE FROM THE SALE OF OPERATING FIXED ASSETS	868	-	-	
part of 764	OTHER REVALUATION OPERATING REVENUE	869	-	-	
	E) TOTAL REVENUE (860+865+866+867)	870	786	-	
	F) COST OF GOODS, MATERIALS, AND SERVICES (872+873+874)	871	786	-	
part of 466	ORIGINAL COST OF MATERIALS AND GOODS SOLD	872	-	-	
460	COST OF MATERIALS	873	-	-	
461	COST OF SERVICES	874	786	-	
	G) LABOR COSTS (876+877+878)	875	-	-	
part of 464	SALARIES AND WAGE COMPENSATIONS	876	-	-	
part of 464	SOCIAL SECURITY CONTRIBUTIONS PAID BY THE EMPLOYER	877	-	-	
part of 464	OTHER LABOR COSTS	878	-	-	
462	H) DEPRECIATION AND AMORTIZATION	879	-	-	
463	I) PROVISIONS	880	-	-	
465	J) OTHER COSTS	881	-	-	

467	K) FINANCIAL EXPENSES	882		-
468	L) OTHER EXPENSES	883	-	-
	M) REVALUATION OPERATING EXPENSES (885+886)	884	-	-
part of 469	EXPENSES FROM THE SALE OF OPERATING FIXED ASSETS	885	-	-
part of 469	OTHER REVALUATION OPERATING EXPENSES	886	-	-
	N) TOTAL EXPENSES (871+875+879+880+881+882+883+884)	887	786	-
	O) SURPLUS (870-887)	888	-	
	P) DEFICIT (887-870)	889		-
part of 80	Corporate income tax	890	-	-
part of 80	Surplus for the period after income tax (888-890)	891	-	-
part of 80	Deficit for the period after income tax (889+890) or (890-888)	892		-
	Surplus from preceding years allocated to covering expenses from the accounting period	893	-	-
	Average number of employees based on the hours worked in the accounting period (whole number)	894	-	
	Months of operation	895	2	

4 OTHER DISCLOSURES

In relation to the lawsuit from A1 Slovenija against the Agency and the Republic of Slovenia, in which A1 Slovenija demands payment in the amount of EUR 3,309,051.21, plus statutory interest accruing from 24 May 2018, and the payment of cost of the proceedings plus the statutory interest. The reason for the lawsuit states that areas were determined incorrectly, leading to incorrect determination of locations at public tender with the public auction for awarding radio frequencies, which was announced in the Official Gazette of RS no 114/13 of 31 December 2013. The court of first instance ruled on 24 September 2020 to reject the lawsuit. A1 Slovenija appealed this. Ljubljana Higher court approved the appeal by a ruling on 25 May 2021, overruling the judgement of the court of first instance, and returned the case to the court of first instance. In the repeated proceedings, the court issued a verdict on 10 November 2023, which once again fully dismissed the plaintiff's claim as unfounded, and imposed on the plaintiff to reimburse the Agency's legal expenses. A1 Slovenija has appealed to the ruling. On 16 February 2024 the Agency responded to the appeal. The Agency has appealed the ruling on costs, as they are assessed too low. The court of appeals has yet to rule on the appeals. The Agency did not make any provisions in the form of long-term accrued cost or expenses based on Article 18 of the Accounting Act.



POROČILO NEODVISNEGA REVIZORJA

Svetu
AGENCIJE ZA KOMUNIKACIJSKA OMREŽJA IN STORITVE REPUBLIKE SLOVENIJE
Stegne 7
Ljubljana

Mnenje

Revidirali smo računovodske izkaze Agencije za komunikacijska omrežja in storitve Republike Slovenije, ki vključujejo bilanco stanja na dan 31. decembra 2024, izkaz prihodkov in odhodkov za tedaj končano leto ter povzetek bistvenih računovodskih usmeritev in druge pojasnjevalne informacije.

Po našem mnenju so priloženi računovodski izkazi Agencije za komunikacijska omrežja in storitve Republike Slovenije (v nadaljevanju Agencija) za leto, ki se je končalo na dan 31. decembra 2024, v vseh pomembnih pogledih pripravljeni v skladu z Zakonom o računovodstvu in z njim povezanimi podzakonskimi predpisi.

Podlaga za mnenje

Revizijo smo opravili v skladu z Mednarodnimi standardi revidiranja. Naše odgovornosti na podlagi teh pravil so opisane v tem poročilu v odstavku Revizorjeva odgovornost za revizijo računovodskih izkazov. V skladu z Mednarodnim kodeksom etike za računovodske strokovnjake (vključno z Mednarodnimi standardi neodvisnosti), ki ga je izdal Odbor za mednarodne standarde etike za računovodske strokovnjake (Kodeks IESBA) ter etičnimi zahtevami, ki se nanašajo na revizijo računovodskih izkazov v Sloveniji, potrjujemo svojo neodvisnost od družbe in, da smo izpolnili vse druge etične zahteve v skladu s temi zahtevami in Kodeksom IESBA.

Verjamemo, da so pridobljeni revizijski dokazi zadostna in ustrezna podlaga za naše mnenje.

Druge informacije

Za druge informacije je odgovorno posloводство. Druge informacije obsegajo poslovno poročilo, ki je sestavni del letnega poročila Agencije, vendar ne vključujejo računovodskih izkazov in našega revizorjevega poročila o njih.

Naše mnenje o računovodskih izkazih se ne nanaša na druge informacije in o njih ne izražamo nobene oblike zagotovila.

V povezavi z opravljeno revizijo računovodskih izkazov je naša odgovornost prebrati druge informacije in pri tem presoditi ali so druge informacije pomembno neskladne z računovodskimi izkazi, zakonskimi zahtevami ali našim poznavanjem, pridobljenim pri revidiranju, ali se kako drugače kažejo kot pomembno napačne. Če na podlagi opravljenega dela zaključimo, da obstaja pomembno napačna navedba drugih informacij, moramo o takih okoliščinah poročati.

V zvezi s tem nimamo o čem poročati.

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Odgovornost posloводства in pristojnih za upravljanje za računovodske izkaze

Posloводство je odgovorno za pripravo in pošteno predstavitev računovodskih izkazov v skladu z Zakonom o računovodstvu in za tako notranje kontroliranje, kot je v skladu z odločitvijo posloводства potrebno, da omogoči pripravo računovodskih izkazov, ki ne vsebujejo pomembno napačne navedbe zaradi prevare ali napake.

Posloводство je pri pripravi računovodskih izkazov družbe odgovorno za oceno njene sposobnosti, da nadaljuje kot delujoče podjetje, razkritje zadev, povezanih z delujočim podjetjem in uporabo predpostavke delujočega podjetja kot podlago za računovodenje, razen če namerava posloводство podjetje likvidirati ali zaustaviti poslovanje, ali če nima druge možnosti, kot da napravi eno ali drugo.

Pristojni za upravljanje so odgovorni za nadzorovanje postopka računovodskega poročanja agencije.

Revizorjeva odgovornost za revizijo računovodskih izkazov

Naši cilji so pridobiti sprejemljivo zagotovilo o tem ali so računovodski izkazi kot celota brez pomembno napačne navedbe zaradi prevare ali napake, in izdati revizorjevo poročilo, ki vključuje naše mnenje. Sprejemljivo zagotovilo je visoka stopnja zagotovitve, vendar ni jamstvo, da bo revizija, opravljena v skladu z MSR-ji, vedno odkrila pomembno napačno navedbo, kadar ta obstaja. Napačne navedbe, lahko izhajajo iz prevare ali napake, ter veljajo za pomembne, če je upravičeno pričakovati, da posamič ali skupaj, vplivajo na gospodarske odločitve uporabnikov, sprejete na podlagi teh računovodskih izkazov.

Med izvajanjem revidiranja v skladu z MSR-ji uporabljamo strokovno presojo in ohranjamo poklicno nezaupljivost. Prav tako:

- prepoznamo in ocenimo tveganja pomembno napačne navedbe v računovodskih izkazih, bodisi zaradi napake ali prevare, oblikujemo in izvajamo revizijske postopke kot odzive na ta tveganja ter pridobimo zadostne in ustrezne revizijske dokaze, ki zagotavljajo podlago za naše mnenje. Tveganje, da ne bomo odkrili pomembno napačne navedbe, ki je posledica prevare, je višje kot tveganje, ki je posledica napake, saj prevara lahko vključuje skrivno dogovarjanje, ponarejanje, namerne opustitve, napačne predstavitve ali izogibanje notranjim kontrolam;
- pridobimo razumevanje notranjih kontrol, pomembnimi za revizijo z namenom oblikovanja revizijskih postopkov, ki so okoliščinam primerni, vendar ne z namenom, izraziti mnenje o učinkovitosti notranjih kontrol družbe;
- ovrednotimo ustreznost uporabljenih računovodskih usmeritev in sprejemljivost računovodskih ocen ter z njimi povezanih razkritij, ki jih je pripravilo posloводство;
- na podlagi pridobljenih revizijskih dokazov o obstoju pomembne negotovosti glede dogodkov ali okoliščin, ki zbujejo dvom v sposobnost organizacije, da nadaljuje kot delujoče podjetje, sprejmemo sklep o ustreznosti poslovodske uporabe predpostavke delujočega podjetja, kot podlage računovodenja. Če sprejmemo sklep o obstoju pomembne negotovosti, smo dolžni v revizorjevem poročilu opozoriti na ustrezna razkritja v računovodskih izkazih ali, če so taka razkritja neustrezna, prilagoditi mnenje. Revizorjevi sklepi temeljijo na revizijskih dokazih pridobljenih do datuma izdaje revizorjevega poročila. Vendar pa kasnejši dogodki ali okoliščine lahko povzročijo prenehanje družbe kot delujočega podjetja.

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S pristojnimi za upravljanje med drugim razpravljamo o načrtovanem obsegu in časovnem načrtu revizije in bistvenih revizijskih ugotovitvah vključno z bistvenimi pomanjkljivostmi notranjih kontrol, ki smo jih ugotovili med revizijo.

Ljubljana, 11. marec 2025

Milan Jerič,
Odgovorni pooblaščen revizor

Audit-i.n.g., revizijske storitve, d.o.o.
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Annual Report

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Networks and Services of the
Republic of Slovenia
for the year 2024



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