



AGENCY FOR ELECTRONIC COMMUNICATIONS
AND
POSTAL SERVICES

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2026
WORK PLAN

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1. SUMMARY OF THE AGENCY'S 2026 WORK PLAN

The starting points for the preparation of the Agency's 2026 Work Plan are the Law on Electronic Communications and the Postal Services Act, as well as other laws and by-laws defining the Agency's competences. The Work Plan is also aligned with Montenegro's strategic documents and the obligations arising from the process of legal and institutional alignment with the *acquis* of the European Union.

2026 Work Plan covers activities in the following areas:

- normative activities in the field of electronic communications, postal services, and related regulation;
- ongoing regulatory and supervisory activities within the Agency's competence;
- cooperation with institutions in Montenegro and international institutions;
- provision of material and technical resources and strengthening of the Agency's administrative capacities.

Normative Activities

Within the scope of normative activities in 2026, the Agency will continue to actively and continuously participate in the drafting, amendments, and implementation of laws and by-laws in the fields of electronic communications and postal services, with the aim of fully aligning the national regulatory framework with the European Union *acquis* and relevant international standards. Special focus will be placed on the provision of expert support to competent authorities in the process of transposition and implementation of new EU acts, including the Digital Services Act (DSA), the Digital Markets Act (DMA), the Agreement on Montenegro's Accession to the EU Single Roaming Market (RLAH – Roam Like At Home), Gigabit Infrastructure Act (GIA), as well as on the preparation of appropriate national normative solutions enabling their consistent and effective application in practice.

Within its statutory competences, the Agency will participate in the drafting and provision of expert opinions on draft laws and by-laws, as well as in the preparation of its own secondary legislation necessary for the implementation of the Law on Electronic Communications and the Postal Services Act. These activities will, as necessary, include additional normative regulation of key issues, such as the protection of users' rights and interests, market regulation and promotion of competition, management of scarce resources, regulation of universal services, and ensuring the security and integrity of electronic communications networks and services, in line with modern regulatory principles and EU practice.

Special attention will be paid to ensuring legal certainty, clarity, and predictability of the regulatory framework through the alignment of existing regulations with new legislative solutions and developments in European regulatory practice, as well as through systematic and continuous monitoring of their implementation. Based on analyses of the effects of new and amended regulations, the Agency will identify potential regulatory gaps, inconsistencies, or

implementation difficulties and, accordingly, initiate amendments to normative solutions in order to improve their effectiveness and applicability.

In parallel, through its normative activities, the Agency will contribute to strengthening institutional capacities and improving the overall functioning of the regulatory system, through active and continuous cooperation with state authorities, international institutions, and regulatory bodies of other countries. This approach will ensure consistent application of laws and by-laws, enhancement of regulatory practice, and creation of a stable, predictable, and harmonised legal framework for the further development of electronic communications and postal services in Montenegro.

Ongoing Activities

During 2026, the Agency will continue intensive regulatory and supervisory activities in the field of roaming, with particular focus on further implementation of the “roam like at home” (RLAH) regime in the Western Balkans region and systematic monitoring of the application of existing decisions prescribing reductions in wholesale and retail roaming prices. Special attention will be paid to supervision of the application of further reduced wholesale data transmission prices entering into force on 1 January 2026, as well as to the consistent implementation of the Roaming Declaration between the European Union and the Western Balkans region, which sets maximum retail prices for data roaming services for the period 2023–2028. In this context, the Agency will actively participate in initiatives aimed at including the Western Balkans region in the EU single RLAH regime, through analyses of alignment of national legislation with the EU acquis, identification of necessary amendments to laws and by-laws, and participation in bilateral and multilateral consultations with the European Commission, regulatory authorities of EU Member States and the region, and competent national institutions. These activities aim to create normative and institutional preconditions for Montenegro’s further integration into the EU single digital market and to enhance protection of end-users’ interests in roaming services.

In the area of user protection and public safety, during 2026 the Agency will continue, in cooperation with competent ministries, the ITU, and electronic communications operators, to actively participate in the development and implementation of the Public Warning System (PWS). The activities will include coordination of the introduction and enhancement of technologies for public warning and alerting, including cell broadcast, location-based SMS messages, and other complementary communication channels, with a special focus on ensuring technical interoperability, reliability and availability of the system, and alignment with European standards and best practices, in order to effectively protect citizens’ lives, health, and property.

The Agency will continuously maintain, update, and improve key registers and databases within its competence during 2026, including registers of electronic communications operators and postal operators, register of assigned radio frequencies, register of numbering resources, register of electronic communications infrastructure and associated facilities, as well as records of call

signs and MMSI numbers. Particular emphasis will be placed on further digitalisation and interoperability of information systems, enhancement of transparency, and development of new functionalities, including the implementation of a new integrated Operator Register, redesign of the register of numbering resources, and modernisation of systems for collection, processing, and analysis of market data.

In 2026, the Agency will conduct analyses of relevant wholesale markets in accordance with the Law on Electronic Communications and the European Commission Guidelines, including application of the three-criteria test, assessment of the presence of operators with significant market power (SMP), and consideration of the need for geographic market segmentation. Based on the results of these analyses, regulatory obligations will, depending on the level of competition identified, be withdrawn, adjusted, or reintroduced, with continuous monitoring of market segments where ex ante regulation has been lifted. At the same time, the Agency will continue activities related to the application and supervision of cost models (top-down CCA/LRIC and bottom-up LRIC), regulation of wholesale prices, calculation of the weighted average cost of capital (WACC), and monitoring of compliance with regulatory obligations imposed on SMP operators, with intensive activities in the field of roaming.

In the area of universal service in electronic communications, during 2026 the Agency will monitor the fulfilment of obligations by newly designated universal service operators, with continuous analysis of the availability and quality of services provided and monitoring of the potential occurrence of net costs.

The Agency will continue supervision of the application of separate accounting and calculation of the net cost of the universal postal service, in cooperation with the universal postal service operator and external consultants, while monitoring compliance with the applicable cost model. Depending on the results of the analyses and practical application of the existing framework, the Agency will, where necessary, initiate amendments to relevant by-laws in order to ensure transparency, system sustainability, and protection of competition in the postal sector.

In the postal sector, activities will be focused on ensuring the prescribed quality of the universal postal service, monitoring system sustainability, price regulation, verification of net cost calculations, and revision of quality measurement of the universal postal service through an independent institution, with the aim of safeguarding users' interests and stability of the system.

Management of the radio-frequency spectrum in 2026 will be one of the Agency's key ongoing activities and will be directed towards rational, efficient, and safe use of this scarce resource, in accordance with the Law on Electronic Communications, regulations of the International Telecommunication Union (ITU), the European Conference of Postal and Telecommunications Administrations (CEPT), and the relevant European regulatory framework. The activities will include planning and assignment of radio frequencies, maintenance and improvement of relevant registers, continuous control and monitoring of the radio-frequency spectrum, and intensive international coordination to prevent and resolve cross-border harmful interference. Focus will be placed on monitoring compliance with obligations arising from authorisations,

including requirements related to territorial coverage and service quality in public mobile networks, as well as preparations for future regulatory and technical challenges, particularly in the context of further development of 5G networks, digital radio broadcasting, and Montenegro's participation in international frequency planning and coordination processes.

In 2026, the Agency will continue its activities related to the management of numbering resources, including their assignment and supervision, maintenance, and further development of the electronic numbering register, and implementation of technical and regulatory measures related to the ISPO system for changing operators. A specific segment of activities will focus on monitoring and supporting the migration of M2M numbering resources to the numbering range with SDN code "71", with emphasis placed on system reliability, service continuity and compliance with current technical and regulatory requirements.

In the area of user rights and protection of users' interests, during 2026 the Agency will continue implementing activities aimed at ensuring a high level of protection of end-users of electronic communications and postal services, in line with applicable legislation and best European regulatory practice. These activities will include conducting out-of-court dispute resolution procedures based on users' complaints, monitoring operators' offers and amendments to contractual terms, verification of compliance of general terms and user contracts with the law, and supervising the application of new user rights prescribed by the Law on Electronic Communications, including the use of contract summaries, transparency of information, protection of the right to service quality, and ensuring open internet access. In addition, the Agency will continue activities aimed at improving user awareness and education through publication of comparative service quality indicators, maintenance and further development of tools for measuring internet connection speed and comparing service prices, enhancement of communication with the public, and implementation of public opinion surveys. Special attention will be paid to the protection of the rights of vulnerable user categories, including ensuring accessibility of information and services for persons with disabilities, as well as further development of electronic channels for submitting complaints and communicating with the Agency, with the aim of strengthening user trust and improving the overall level of protection of their rights and interests.

The Agency will provide expert opinions and approvals in procedures related to the planning and construction of electronic communications networks and infrastructure, including new competences related to issuing approvals for main designs in high-rise buildings and transport infrastructure, as well as matters concerning the exercise of rights of way and ensuring access to existing physical infrastructure. These activities will be aimed at enabling efficient network development, rational use of space and infrastructure, and ensuring a balance between the interests of operators, users and property owners.

Activities of the Agency in 2026 will also include the implementation of measures aimed at protecting the integrity, reliability and security of electronic communications networks and services, in accordance with applicable regulations in the field of information and cyber security. In this context, the Agency will cooperate with competent state authorities and other

relevant institutions in the area of critical infrastructure protection, exchange information on risks and threats, and monitor the implementation of prescribed security measures by electronic communications operators.

Furthermore, the Agency will conduct regular and extraordinary inspection supervision in the field of electronic communications, as well as professional supervision in the field of postal services, with the aim of ensuring consistent application of laws, by-laws and individual regulatory decisions. Supervisory activities will focus on monitoring compliance with prescribed obligations by operators, handling initiatives and complaints, and undertaking appropriate measures in cases where irregularities are identified. Depending on possible amendments to the legislative framework, the possibility of extending the Agency's competences in the area of inspection supervision in the postal sector will also be considered.

During 2026, the Agency will participate in the implementation of measures arising from relevant national strategic documents, including strategies in the fields of digital transformation, 5G network development, cyber security, postal services and consumer protection, as well as in monitoring and implementation of new European Union acts, such as the Digital Services Act (DSA), the agreement on Montenegro's accession to the EU single roaming market (RLAH), Digital Markets Act, and the Gigabit Infrastructure Act (GIA). These activities will require continuous strengthening of the Agency's organisational capacities, human resources and financial resources in order to ensure timely and efficient implementation of new competences.

Within other activities in 2026, the Agency will continue strengthening its institutional capacities through improvement of management and internal control systems, standardisation of internal procedures and further internal re, with a view to ensuring efficient, transparent and lawful performance of all tasks within its competence. Emphasis will be also placed on the application and regular updating of risk management policy, risk register and risk treatment plan, updating business processes, improving planning, reporting and information exchange systems, and strengthening internal and external communication in accordance with the Law on Public Sector Management and Internal Control and the principles of good governance. In parallel, the Agency will implement activities aimed at adapting its al structure to new and expanded competences, standardising business processes, strengthening inter-sectoral coordination, continuous professional development of employees, and further development of the information system and information security, thereby ensuring a stable and sustainable basis for the high-quality performance of the Agency's regulatory, supervisory and development functions.

Cooperation with Institutions in Montenegro and International Institutions

During 2026, cooperation with state authorities and institutions in Montenegro will focus on further planned, systematic and continuous coordination with competent ministries, independent regulatory authorities, inspection and supervisory bodies, state administration

authorities and local self-government units, with a view to ensuring the effective implementation of laws, secondary legislation and public policies in the fields of electronic communications and postal services. Such cooperation will include the exchange of relevant data and information, preparation and provision of expert opinions, consents and analyses, participation in the work of inter-institutional working groups and commissions, as well as coordination in procedures related to the planning and deployment of electronic communications infrastructure, management of scarce resources, protection of end-users' rights and safeguarding of public security. Special emphasis will be placed on cooperation in the process of aligning national legislation with the *acquis* of the European Union, including the transposition and implementation of new EU legal acts, as well as on the joint implementation of strategic and reform measures defined by relevant national strategic documents. Through such cooperation, the Agency contributes to the strengthening of institutional capacities, consistent application of legislation, and enhancement of inter-institutional coordination and establishment of a stable, predictable and effective regulatory framework in Montenegro.

At the international level, in 2026 the Agency will continue to engage actively and substantively in the work of European and international *s* and forums in the fields of electronic communications and postal services, with a view to monitoring contemporary regulatory and technological developments, exchanging experience and further improving national regulatory practice. Special attention will be placed on cooperation with institutions and bodies of the European Union, as well as relevant international *s*, in order to strengthen the Agency's capacities and ensure timely adaptation of the domestic regulatory framework to dynamic market and technological developments. The Agency will continue its active participation in the work of Body of European Regulators for Electronic Communications (BEREC), including its governing structures (the President of the Council has been elected as a member of the BEREC Mini-Board for 2026) and expert working groups. The Agency will also continue its cooperation within the framework of the International Telecommunication Union (ITU) and the European Conference of Postal and Telecommunications Administrations (CEPT), within which a representative of the Agency has been elected as coordinator under Agenda Item 9.2 of the World Radiocommunication Conference 2027 (WRC-27), relating to the consideration of difficulties or inconsistencies in the application of Radio Regulations in the context of the Report of the Director of the ITU Radiocommunication Bureau (BR), as well as in other relevant international forums. Through these activities, the Agency will contribute to the development of common regulatory positions, exchange of technical and regulatory knowledge and strengthening of regional and international coordination. This primarily refers to the area of radio-frequency spectrum management and preparation of the participation of the Montenegrin delegation at WRC-27, as well as in the areas of competition protection and end-users' rights. In parallel, the Agency will further develop and enhance bilateral and multilateral cooperation with regulatory authorities of other countries, particularly those of the region and of the EU Member States through joint projects, expert visits, workshops and technical assistance programmes, thereby enabling the transfer of best regulatory practices, the strengthening of institutional capacities and more effective integration of Montenegro into European and international regulatory processes.

Provision of Material and Technical Resources and Strengthening of Administrative Capacities

In 2026, the Agency will carry out activities aimed at strengthening its material and technical resources and administrative capacities, with a view to ensuring adequate human, technical and al resources necessary for the effective performance of its actual and newly assigned competences. Special focus will placed on the planned strengthening of human resource capacity through the continuous professional development of the existing expert personnel and, where necessary, through the recruitment of additional staff, in particular in the areas of radio-frequency spectrum management, protection of end-users' rights, market analysis, digital services and cybersecurity. In parallel, the Agency will continue to enhance its material and technical capacities, including the procurement, modernisation and maintenance of specialised equipment, information systems and software tools required for the performance of regulatory, supervisory and control-measurement activities. Special attention will be devoted to the development and strengthening of the Agency's information system, ensuring reliable technical conditions for the operation of control and measurement centres and RF spectrum monitoring systems, as well as to the enhancement of information security and cybersecurity. The strengthening of capacities will be in line with further optimisation of the organisational structure and internal processes, improvement of planning and human resource management systems, and the provision of necessary financial resources. This will provide a stable and sustainable foundation, ensuring the high-quality, independent and efficient performance of regulatory and supervisory functions, in accordance with national needs and European standards.

2. INTRODUCTION

The Agency for Electronic Communications and Postal Services (hereinafter referred to as: the Agency) is an independent regulatory authority which in performing its authorities in the field of electronic communications and postal services carries out regulatory and other activities in accordance with the law, and in performing these activities the Agency will not receive nor ask for the instructions from the state and other authorities and or other persons.

The Agency's 2026 Work Plan has been prepared in accordance with the following laws: the Law on Electronic Communications ("Official Gazette of Montenegro", No. 100/24 of 18.10.2024), (hereinafter referred to as the Law), Postal Services Act ("Official Gazette of Montenegro", Nos. 57/11, 55/16, 55/18, and 84/24), and the Law on the Use of Physical Infrastructure for the Deployment of High-Speed Electronic Communications Networks ("Official Gazette of Montenegro", No. 1/22). The competences of the Agency's Council are set out in Article 181 of the Law on Electronic Communications and as referred to in Article 181(1)(6), the Agency's Council shall prepare the Work Plan and the Financial Plan of the Agency. As referred to in Article 196 of the Law on Electronic Communications, the Work Plan shall include the information on the goals, success indicators and the activities necessary for the realisation of those goals, as well as medium-term plans and policies of the Agency.

The Agency's Work Plan also includes the Agency's obligations arising from the following:

- Montenegro Digital Transformation Strategy 2022-2026;
- Montenegro Cyber Security Strategy 2022-2026;
- Strategy for the Development of 5G Mobile Communications Networks in Montenegro 2023-2027;
- Montenegro Postal Services Development Strategy 2024-2028;
- Strategy for the Prevention and Suppression of Violent Extremism, Terrorism, Money Laundering and Terrorism Financing 2025-2030;
- Strategy for the Prevention and Suppression of Terrorism, Money Laundering and Terrorism Financing 2022-2025;
- National Plan for the Network Development for Broadband Internet Access 2025-2029; and
- Action Plan for the National Consumer Protection Program.

The Agency's Work Plan is also aligned with the obligations of the Agency, arising from other laws: the Law on Inspection Control, Consumer Protection Law, Law on Audio Visual Media Services, Law on Public Procurement, Labour Law, Law on Safety and Health at Work, Law on Administrative Procedure, Law on Accounting, Law on Auditing, Law on Management and Internal Controls in the Public Sector, Law on Protection of Competition, Law on Prevention of Corruption, Law on Personal Data Protection, Law on Electronic Government, Law on Free Access to Information, Law on Spatial Planning, Law on Construction of Structures, Law on Protection against Non-Ionising Radiation, Law on Environmental Protection, Law on

Protection of Persons and Property, Law on Information Security, Law on Prevention of Money Laundering and Terrorist Financing, Law on Fiscalisation in the Trade of Products and Services, Law on Payment Transactions, Law on Maritime Navigation Safety, Law on Games of Chance and other applicable laws, as well as by-laws adopted pursuant thereto.

3. ACTIVITY PLAN

3.1. NORMATIVE ACTIVITIES

The Law on Electronic Communications prescribes the regulatory acts to be adopted by the Agency in accordance with the Law, as well as the expert bases for drafting regulations adopted by the Government of Montenegro and the competent ministries pursuant to this Law, which are prepared by the Agency. Since the entry into force of this Law in 2025, the Agency has adopted the secondary legislation within its competence under the provisions of the Law and, where necessary, will carry out amendments and supplements thereto in 2026. The Agency has also prepared expert bases for secondary legislation adopted by the Government of Montenegro and the competent ministries pursuant to this Law.

Given that these regulatory activities give rise to numerous obligations for electronic communications operators, such as the alignment of general terms and conditions for the provision of services with the new regulatory framework and the alignment of standard contract templates, the Agency will, in 2026, monitor the implementation of the provisions of the regulatory acts it has adopted and issue approvals for general terms and conditions and end-user contracts.

The Agency will continue to participate in the preparation of draft texts of other laws relevant to the sectors it regulates. In particular, during 2025, activities were initiated relating to amendments to the Law on the Use of Physical Infrastructure for the Deployment of High-Speed Electronic Communications Networks (“Official Gazette of Montenegro”, No. 001/22), with the aim of alignment with EU legislation, notably the Gigabit Infrastructure Act (GIA). A working group has been established by the Ministry of Economy, including representatives of the Agency.

Furthermore, activities are ongoing within a working group established by the Ministry of Culture and Media for the preparation of draft laws transposing the European Media Freedom Act (EMFA) and the Digital Services Act (DSA). These activities are planned to be completed in 2026, and the Agency will be actively involved in the transposition process of the aforementioned EU legal acts.

Intensive alignment with the following regulations will be done in 2026: Roaming Regulation (EU) 2022/612, Commission Implementing Regulation 2016/2286, Commission Delegated Regulation (EU) 2021/654, BEREC Regulation (EU) 2018/1971, with the objective of abolishing roaming charges between the Western Balkans and EU Member States.

Considering that the Agency has provided comments during public consultations on the Draft Law on Consumer Protection, the Draft Law on Cinematography, and the Draft Law on Salaries of Employees in the Public Sector, and that the latter has not been adopted at the date of preparation of this Plan, the Agency will, where necessary, submit additional comments and suggestions.

In addition, the adoption of the Digital Fairness Act (DFA), which aims to evaluate the implementation of key EU consumer protection directives, is expected in 2026. The Agency will closely monitor developments related to this Act to ensure adequate protection of end-users, including, where applicable, the performance of regulatory activities.

In 2026, the Agency will also, within its competences, carry out regulatory activities relating to secondary legislation adopted pursuant to other laws. Special focus will be placed on monitoring the implementation of, and where applicable, amending secondary legislation governing: detailed rules on the application of the fair use policy, the methodology for assessing the sustainability of the abolition of retail roaming surcharges, and the requests submitted by operators for the purposes of such assessments. The Agency will continuously monitor their application and activities carried out within the framework of the Berlin Process, with the aim of timely preparation for the implementation of new regional roaming agreements and other international initiatives relevant to the electronic communications sector.

The Postal Services Act sets out the acts to be adopted by the Agency in accordance with the Act, as well as the expert bases for drafting regulations to be adopted by the competent ministry pursuant thereto. In the previous period, the Agency adopted the secondary legislation within its competence under the Postal Services Act and prepared expert bases for the secondary legislation adopted by the competent ministry pursuant to that Act.

The Ministry of Economic Development has appointed a working group to prepare a draft Act amending the Postal Services Act, of which the Agency is a member. The adoption of the Act amending the Postal Services Act is planned by the end of 2025. In 2026, should the adopted amendments so require, the Agency will amend existing secondary legislation, adopt new secondary legislation, or prepare expert bases for amendments to secondary legislation to be adopted by the Ministry.

In 2026, where alignment with best practices and amendments to relevant primary or secondary legislation in Montenegro so require, the Agency will amend the secondary legislation it has adopted in order to ensure compliance of its operations with the applicable legal framework.

In 2026, the Agency will conduct a review of its internal acts with a view to improving efficiency, in particular internal organisation and alignment with new legislative solutions arising from expected regulatory policy trends, the application of the Law on Electronic Communications, and the Act amending the Postal Services Act, the adoption of which is expected at the end of 2025. In this context, amendments to the Rulebook on Internal Organisation and Job Classification of the Agency for Electronic Communications and Postal Services will be necessary.

Pursuant to Articles 17–25 of the Law on Media, the Agency will regulate the allocation of financial resources, including the adoption of an internal act governing procedures and rules on public advertising, as well as keeping of records on sponsored content, advertising, and other contracted services, in accordance with the templates and guidelines of the Ministry of Culture

and Media. These records will be published on the Agency's website by 31 March of the current year for the preceding year and submitted to the Ministry within the prescribed deadline.

The regulations and acts adopted by the Agency, as well as the expert bases for regulations and acts adopted by ministries and the Government of Montenegro, are available on the website at www.ekip.me.

3.2. ONGOING ACTIVITIES

The performance of ongoing activities prescribed by laws, secondary legislation, and other documents governing the fields of electronic communications and postal services will include the following activities. These include registration of operators, management and maintenance of registers and databases, collection of data on electronic communications and postal services markets; the conduct of market and public opinion surveys, and the publication of market development indicators. The Agency will also carry out dispute resolution in the electronic communications and postal services markets, promote sustainable competition and the efficient use of electronic communications infrastructure and postal networks, analyse relevant markets, designate operators with significant market power and implement regulatory measures to prevent the adverse effects of significant market power. Activities will further include monitoring the development of Universal Service and managing the collection of contributions for its financing, verifying any net cost of providing universal postal service, implementing measures to ensure efficient management of scarce resources, improving the quality of electronic communications services and universal postal services, and conducting procedures for the allocation of scarce resources on non-discriminatory grounds, including the issuance of authorisations for their use.

In addition, the Agency will carry out control and monitoring of the radio frequency spectrum, coordinate radio frequency use with the authorities and/or institutions of other states, handle user complaints, consider initiatives and determine procedures for the protection of users' rights and interests, conduct inspection and professional supervision of the application of laws, regulations and individual acts adopted thereunder, issue opinions on the compliance of electronic communications network planning with the Law on Electronic Communications, and prepare expert bases, opinions, and analyses in the fields of electronic communications and postal services.

Given the regulatory activities related to the transposition of the European Media Freedom Act (Regulation (EU)), the Digital Services Act (DSA) and Gigabit Infrastructure Act (GIA), as well as the planned adoption of the relevant transposing legislation in early 2026, it is expected that the Agency will be entrusted with new competences under these legal acts, requiring appropriate adjustments of organisational and professional capacities.

Pursuant to the Law on Electronic Communications, the Agency has been entrusted with new competences. Accordingly, during 2026 and in the period thereafter, it will be necessary to

continue planning of the human and financial resources necessary for their efficient implementation. The new competences of the Agency include:

- deciding on the right of way over assets of general interest and immovable property owned by the State or by local self-government units, as well as immovable property subject to property rights exercised by public service entities, will be carried out in accordance with the law governing the use, management and disposal of assets owned by Montenegro or local self-government units. This applies in the cases where no agreement has been reached between the operator requesting the right of way for the purpose of deploying a new electronic communications network and the authorities exercising those property rights;
- issuing approvals of the main design documentation in the review procedure for the construction of electronic communications networks, electronic communications infrastructure, and associated facilities in buildings exceeding 500 m²;
- issuing approvals of the main design documentation in the review procedure for the construction of public roads, railway infrastructure, airports with associated infrastructure and port infrastructure (transport infrastructure);
- enabling operators' access to and/or use of existing physical infrastructure in facilities, under conditions based on the principles of non-discrimination, proportionality and transparency.

A. Management and Maintenance of the Agency's Registers and Databases

The Agency maintains registers and databases of operators, assigned radio frequencies, assigned numbering resources, electronic communications infrastructure, and associated facilities, as well as assigned call signs and international maritime radiocommunication identification numbers for radio equipment used in the maritime mobile radiocommunication service, and assigned call signs for radio amateur radio operators. During 2026, work on the maintenance, development and upgrading of the information system supporting the management and maintenance of these registers and databases will continue.

1. Register of Operators

Any legal or natural person, prior to commencing use, and any operator prior to terminating or changing the regime of use of public electronic communications networks or the provision of public electronic communications services, will submit a written notification to the Agency at least 15 days prior to commencement, termination or change of regime of the use of electronic communications networks or the provision of public electronic communications services. Based on such notification, the Agency enters the relevant data into the Register of Electronic Communications Operators, which is also published on the Agency's website.

Pursuant to the Law on Electronic Communications, together with the certificate of registration, the Agency issues an overview of general and specific obligations, as well as the operator's

rights arising from registration. In this regard, further enhancement of the information system and the Register of Operators is planned for 2026.

Pursuant to the Postal Services Act, postal services may be provided by postal operators entered in the Register of Postal Operators on the basis of a specific licence, licence or extract from the register. The Agency maintains the Register of Postal Operators, which contains legally prescribed data and is publicly available on the Agency's website. During 2026, continuous maintenance and improvement of this Register is planned, in line with the Postal Services Act and submitted applications.

The Agency plans to implement a new Register of Operators in 2026, capable of integration with other systems of the Agency.

2. Register of Assigned Radio Frequencies

Pursuant to the Law on Electronic Communications, the Agency shall maintain the Register of Assigned Radio Frequencies. The Register of Assigned Radio Frequencies shall contain the following data:

- serial number of the entry;
- reference number and date of issuance of the authorisation for the use of radio frequencies or the reference number and date of submission of the notification of radio frequency use;
- data concerning the holder/applicant of the authorisation for the use of radio frequencies;
- assigned/notified radio frequencies or frequency bands, where applicable;
- class and/or call sign, where applicable;
- period of validity of the authorisation for the use of radio frequencies;
- location of the transmitter/receiver and area of use, where applicable;
- purpose of the use of radio frequencies;
- on the termination and/or withdrawal of the authorisation for the use of radio frequencies.

Register of Assigned Radio Frequencies shall be maintained on the basis of data contained in applications for the issuance of authorisations for the use of radio frequencies or notifications of radio frequency use. It shall be kept in electronic form, enabling comprehensive data search, regularly updated and published on the Agency's website. Electronic Register of Assigned Radio Frequencies shall be maintained in the form of a database managed by specialised software of the ATDI manufacturer, and an appropriate extract thereof shall be displayed and made publicly available on the Agency's website.

During 2026, the Agency will continue to update the registers, including database of valid authorisations, and will implement an upgrade enabling enhanced transparency and interactivity

through a web portal, which will, inter alia, provide users with different levels of access to the data contained in the electronic register.

3. Numbering Register

In 2020, the Agency implemented a new electronic register of numbering and addresses, based on an up-to-date database enabling a detailed overview of utilisation and availability. The Register provides an overview of all issued authorisations and their details, an overview of assigned numbering resources, as well as decisions on the withdrawal thereof, together with detailed reports on all assigned and withdrawn numbering resources. In 2026, in addition to the maintenance and regular updating of the Register, a redesign is planned through the use of new technologies and its further enhancement by introducing new functionalities, with a view to increasing the efficiency of numbering management.

4. Database of Electronic Communications Infrastructure

The Agency shall maintain records of the type, availability and geographical location of existing and planned electronic communications infrastructure, as well as associated facilities and network elements. For this purpose, a georeferenced database of electronic communications infrastructure has been established, accessible to all interested parties and enabling the mapping of broadband internet access availability, as well as insight into plans for further network development.

During 2026, further development and enhancement of this system will continue, in particular with regard to verifying the accuracy of the entered data, collecting new types of data, including quality of service parameters and information on networks capable of providing broadband access in the future, as well as mapping quality of service parameters for fixed broadband and 5G networks, in accordance with the methodology of the European Commission.

5. System for Collecting and Processing Data on the Electronic Communications Services and Postal Services Market

Pursuant to the Law on Electronic Communications, the Agency shall regularly publish reports on market development indicators based on data collected from operators. Under the Postal Services Act, the Agency shall monitor the state and development of the postal services market and, in accordance with its competence, shall collect, process and publish financial, statistical, accounting and other data from operators concerning the state and development of the postal services market. For the purpose of exercising these powers, the Agency has implemented a system for the collection and processing of data on the electronic communications services market and the postal services market, enabling operators to submit data electronically via a web portal. This has significantly facilitated collection and processing of data. In 2023, the system was upgraded, primarily through the application of new technologies in database management, system security, an increase in the number of automatically generated reports, development of new questionnaires and adaptation of the system to developments in the electronic communications and postal services markets, as well as to technological changes,

with a view to ensuring the availability of all relevant market data through a single integrated system.

In 2026, taking into account the period elapsed since the system was established, a redesign and further upgrade of the system are planned through the use of new technologies, with a view to ensuring the fulfilment of the Agency's obligations.

6. Records of Access and/or Interconnection Agreements

In accordance with the Law on Electronic Communications, for the purpose of maintaining records, the operator shall submit to the Agency a copy of each agreement concluded on access and/or interconnection with operators in Montenegro and other countries. In 2026, the Agency shall keep records of submitted agreements on access and/or interconnection and their annexes.

7. Database of Prices for Electronic Communications Services Provided by Operators and Database of Promotional Offers provided by Electronic Communications Operators

Database of prices for electronic communications services provided by operators shall contain the following data:

- postpaid tariff packages in the current offer;
- prepaid tariff packages in the current offer;
- postpaid and prepaid tariff packages not included in the current offer;
- fixed telephony packages;
- internet packages for residential and business customers;
- mobile internet packages for residential and business customers;
- packages not included in the current offer;
- pricelist for international calls (fixed and mobile telephony);
- roaming prices;
- internet add-ons; and
- TV packages.

Database of promotional offers provided by electronic communications operators shall contain notifications submitted to the Agency by electronic communications operators regarding promotional offers, price changes, new packages, and packages not included in the current offer.

8. Register of Assigned Call Signs / MMSI Numbers

Pursuant to Article 176 of the Law on the Safety of Maritime Navigation ("Official Gazette of Montenegro", Nos. 62/13, 6/14, 47/15, 71/17, 34/19, 77/20, and 84/24), the Agency regulates the manner, conditions and procedure for the assignment of call sign and MMSI number and keeping the register on the call sign and MMSI numbers.

The register of assigned call signs /MMSI numbers is kept based on data from the request for assigning the call sign/MMSI number and decision on assigning the call sign/MMSI number.

B. Protection of Competition in the Field of Electronic Communications

1. Analysis of Relevant Markets

In accordance with the Law on Electronic Communications and the Decision on the relevant markets, in 2026, the Agency shall perform the analysis procedures of the relevant wholesale markets, which include identification of markets within the scope of services and geographic area, the application of three criteria test, assessment of the existence of significant market power (SMP) operators, as well as the assessment and, when required, harmonisation of the valid regulatory obligations. Special focus will be placed on the request of geographic market segmentation, along with the use of available data on the infrastructure and market competition, including data within the geographic review of the broadband network availability.

The analysis shall include the following wholesale markets:

- wholesale market of the local access provided at fixed location - with the focus on the identification of the area with infrastructure competition and the area where it does not exist, with the possibility of different regulatory treatment per geographic segment;
- wholesale market of guaranteed capacities – with the assessment of competition conditions at national and local level, and considering the need for the geographic segmentation and adaptation to the obligations with regard to the competition intensity;
- wholesale market of the access to physical infrastructure – including the application of three criteria test, considering that this market is not included in the Recommendations of the European Commission in 2020, and the assessment of the justification of ex-ante regulation;
- wholesale market of central access provided at the fixed locations for the mass market products – with the analysis of the infrastructure conditions and service competition and eventual geographic differentiation of the obligations.

On markets and/or geographic segments where it is determined that the conditions for ex ante regulation are no longer met (based on the three-criteria test), regulatory obligations shall be withdrawn. On markets where the presence of operators with significant market power (SMP) is established, the Agency shall impose and adjust appropriate regulatory obligations, in accordance with the European Commission Guidelines on market analysis and the objectives of promoting sustainable competition, investment, and end-user protection.

The Agency monitors market conditions and developments and, where it assesses that market changes are not sufficiently significant to warrant the conduct of a new market analysis

procedure, it shall assess whether to amend or withdraw certain regulatory obligations imposed on an operator with significant market power, or whether to impose new regulatory obligations. In such cases, following the completion of a public consultation process, the Agency shall adopt an appropriate decision.

Given that the Law provides for the conduct of relevant market analyses within five years from the adoption of the previous analysis, the Agency shall monitor market developments and assess whether changes in competitive conditions have occurred within specific geographic units which, based on data from the Geographical Survey and according to the selected criteria, meet the conditions for a change in their competitive/non-competitive status. In this regard, the Agency shall determine the timeframe within which, following the entry into force of the analysis, it will update the list of geographic units based on the results of the Geographical Survey, thereby taking into account market changes occurring prior to the next round of market analysis, i.e., before the expiry of the five-year period.

2. Activities related to top-down CCA/LRIC cost models

In accordance with the timeline set out in the Accounting Separation and Cost Accounting Methodology, during 2026 the Agency will continue to monitor the regulatory reporting process based on Current Cost Accounting (CCA) and the Long-Run Incremental Cost (LRIC) standard of operators with significant market power in the fixed electronic communications network domain. By decisions adopted in 2025, the Agency removed the regulatory obligations related to cost accounting and accounting separation. These decisions relieved operators with significant market power on the relevant wholesale market for call termination in mobile networks and on the relevant wholesale market for access and call origination in mobile networks, from the obligation to develop top-down CCA/LRIC cost models for mobile networks.

Existing top-down models, developed and refined over previous years in cooperation with electronic communications operators, are a useful regulatory tool for price adjustments of regulated services, as well as a valuable source of information for various regulatory purposes. By comparing input data used in operators' top-down cost models with the Agency's bottom-up cost model, a higher level of data control is achieved, along with a better understanding of operators' business activities.

3. Application of bottom-up LRIC model results – regulation of wholesale service prices

The Agency has developed and implemented a bottom-up LRIC cost model for fixed and mobile electronic communications networks. Following the prescribed procedure, on 7 September 2023 the Agency's Council adopted Decision addressed to Crnogorski Telekom regulating wholesale prices of fixed network services using the BU LRIC cost model, as well as decisions addressed to Crnogorski Telekom, Mtel and One Crna Gora regulating wholesale prices of mobile network services using the BU LRIC cost model.

On 5 October 2023, the Agency's Council adopted decisions addressed to One Crna Gora, Mtel and Telemach Crna Gora on the application of wholesale call termination rates in their respective fixed telephone networks.

By these decisions, the Agency required operators to apply specific unit prices over a three-year glide path period, publish such unit prices in their Reference Offers, and amend existing interconnection agreements accordingly. Operators implemented the mandated reductions in wholesale prices of relevant services by 1 November 2025, which will remain in force until 31 October 2026.

As an exception to other regulated relevant wholesale services, for call termination in fixed and mobile networks the Agency imposed on SMP operators an obligation of gradual price alignment over a three-year glide path period, in line with the European Commission regulation establishing maximum price caps for these services. As of 1 November 2025, these prices have been aligned with those applied by European operators and will remain in force until 31 October 2026.

4. Calculation of the Weighted Average Cost of Capital (WACC) for 2025

The weighted average cost of capital represents the rate of return on investments that SMP operators – subject to accounting separation, cost accounting, and cost-oriented pricing obligations – may reasonably expect, i.e., a reasonable margin over the cost-of-service provision.

In 2026, the Agency will calculate the Weighted Average Cost of Capital (WACC) for 2025.

5. Monitoring the implementation of regulatory obligations imposed on SMP operators

In previous years, in accordance with the conditions and deadlines prescribed by the Law, the Agency conducted analyses of relevant markets and imposed appropriate regulatory obligations on SMP operators in certain markets. During 2026, the Agency will monitor the implementation of all regulatory obligations imposed on SMP operators across relevant markets, based on previously conducted market analyses.

6. Activities on reducing roaming prices in public mobile communications networks in the Western Balkans and between the EU Countries and the Western Balkans

In 2019, the Agency started implementing the Agreement on the reduction of roaming charges in public mobile communications networks in the Western Balkans. In December 2020, as part of its final phase, the Agency adopted a Decision imposing on Crnogorski Telekom, Telenor and Mtel the obligation to introduce the “Roam Like at Home” (RLAH) regime as of 1 July 2021. The Agency also adopted a Rulebook laying down rules on fair use, the methodology for assessing sustainability, and the conditions under which operators may deviate from the applicable charging mechanism.

At the beginning of June 2021, the Agency adopted Guidelines for the implementation of the above Decision and Rulebook at the retail level (Guidelines for Retail Roaming in the Western Balkans), in order to facilitate their application.

During 2026, monitoring of the implementation of the above Decision by the operators will be continued, and will include reduction of maximum average wholesale data roaming prices as of 1 January 2026, and compliance of the Decision with the applicable regulatory framework.

The reduction of data roaming prices in public mobile communications networks between the EU and the Western Balkans is envisaged under the Roaming Declaration signed on 6 December 2022. The Declaration is a result of the agreement between around 40 mobile operators from the EU and the Western Balkans and has been prepared with the support and participation of the Regional Cooperation Council (RCC) and the European Commission. The Declaration represents a step forward towards reducing data roaming prices between the EU and the Western Balkans. In line with the provisions of the Declaration, mobile operators have agreed to establish retail price caps per 1 GB of roaming data for the period from 1 October 2023 to 1 October 2028.

During 2026, monitoring of implementation of the Roaming Declaration will continue, in particular regarding application of agreed retail price caps for roaming data among mobile operators which are signatories to the Declaration.

Furthermore, in mid-2025, the initiative to include the Western Balkans in the EU RLAH regime was reactivated. The European Commission informed relevant authorities in the Western Balkans that appropriate legal solutions are being sought to enable such inclusion, and highlighted the need for alignment with the EU regulatory framework which is necessary for the implementation of the RLAH between the EU and the Western Balkans.

In order to achieve full alignment with the EU regulations, the Agency will prepare proposals for amendments to the Law on Electronic Communications and relevant secondary legislation, following an analysis of alignment of national legislation framework with the EU acquis in the field of roaming and identifying the provisions which have not been transposed and are subject to further alignment.

In addition, the Agency will participate in the preparation and implementation of bilateral consultations with the European Commission with a view to signing the agreements on Montenegro's accession to the single EU roaming market ((RLAH – *Roam Like At Home*), and propose the manner of fulfilling the requests arising from a new Roving Regulation, upon including Montenegro in this regime.

Depending on further activities of the European Commission and competent ministries from the Western Balkans, in 2026 the Agency will actively contribute, within its competences, to the implementation of the initiative to include the Western Balkans in the EU RLAH.

7. Initiative to reduce retail prices of calls in the Western Balkans

In 2024, the Agency's representatives proposed the inclusion of retail price caps for international calls within the Western Balkans as part of the Common Regional Market Action Plan (CRM 2) for 2025-2028, prepared by the Regional Cooperation Council (RCC). The proposal was accepted and incorporated into the Common Regional Market Action Plan (CRM2) for 2025-2028 (Part: Digital Transformation – Connectivity). The initiative also includes reductions in international call termination prices within the Western Balkans.

In order to implement this initiative, during 2026, the Agency will continue its activities, within its competences, in cooperation with the RCC, relevant ministries and regional regulators from the Western Balkans.

C. Maintaining Accounting Separation of the Universal Postal Operator

The Agency will continue in 2026 to monitor the implementation of accounting separation and net cost calculation of the universal postal service of the universal postal operator.

1. Monitoring the Implementation of the Rulebook on Accounting Methodology and Calculation of Net Cost of Universal Postal Service Provision

During 2026, the Agency will continue, in cooperation with the selected consulting team, to monitor the implementation of the Rulebook on accounting methodology and calculation of net cost of universal postal service provision ("Official Gazette of Montenegro", Nos. 37/17, 08/19, 75/20, 45/23, 48/24, and 43/25). This includes monitoring the activities of the universal postal service provider related to accounting separation, accounting practices and calculation of net cost of providing the universal postal service, as well as monitoring the compliance of these activities with the prescribed cost model and the envisaged implementation timeline.

In cooperation with the selected consultant and the universal postal service provider, the Agency will, where necessary, prepare amendments to the aforementioned Rulebook.

2. Regulation of Prices for Universal Postal Services

During 2026, the Agency will continue its activities related to the regulation of prices for the universal postal service. Taking into account that in November 2023 the Agency granted approval to the pricelist for universal postal services of Pošta Crne Gore, the application of which started on 1 January 2024, the Agency will continue in 2026 to monitor the application of postal service prices through the preparation of an analysis of the prices of universal postal services of Pošta Crne Gore. The analysis will also include a comparative assessment of these prices with the prices of the same services in the countries of the region and in certain EU Member States.

D. Universal Services

1. Universal Service in Electronic Communications

In 2020, following a public tender procedure, the Agency designated Mtel d.o.o. Podgorica, a telecommunications company, as the universal service operator for the Universal Directory Service and Directory Enquiry Service for a five-year period, that is, until 25 January 2026.

During the same year, the Agency designated Crnogorski Telekom a.d. Podgorica as the universal service provider for access to the electronic communications network, telephone calls and internet access throughout Montenegro, also for a five-year period, that is, until 25 January 2026.

In 2025, secondary legislation was adopted based on the new Law on Electronic Communications, providing a more detailed framework for the provision of universal services. Quality Analysis of Universal Service Provision was also carried out, and based on its conclusions, a Decision on conducting a public tender procedure for the designation of universal service operators was adopted. By the end of 2025, universal service providers will be designated to provide the relevant services as of 25 January 2026.

During 2026, the Agency will monitor the development and implementation of universal service by universal service providers and will work on promoting universal service, fostering cooperation between universal service providers, state authorities and local self-government units in this area, and undertaking further measures aimed at ensuring the high-quality provision of universal services.

Special attention will be on the implementation of technologies enabling a more rational and efficient realisation of connections based on requests for the provision of universal service, as well as on the procedure for approving any potential net cost of providing universal service in electronic communications.

2. Universal Service in the Postal Services

During 2026, the Agency will, within its competence, monitor the provision of the universal postal service by the designated universal postal service operator, undertaking measures aimed at ensuring the prescribed quality standards of the universal postal service. Particular attention will be placed on the selection of the universal postal service provider, ensuring the sustainability of this service, and the implementation of obligations prescribed by the Postal Services Act, the Strategy for the Development of Postal Activities in Montenegro, and the planned amendments to the Postal Services Act. These obligations relate to initiating the procedure for the selection of the universal postal operator, continuing the activities identified in the Study on Sustainability of the Universal Postal Service Obligation. The obligations also relate to conducting the procedure for the net cost verification and deciding on the eventual

compensation of the cost of the provision of universal postal service, where such costs represent an unfair financial burden for the universal postal operator.

Given that the special licence granted to Pošta Crne Gore as the universal postal operator expires on 15 February 2027, the Agency will initiate the procedure for the selection of the universal postal service provider during 2026.

In addition to regular supervision of the universal postal service provision, the Agency will undertake other activities to ensure that the universal postal operator complies with the quality standards prescribed by the Postal Services Act and the relevant secondary legislation. In 2025, Pošta Crne Gore was also obliged to carry out quality measurements of universal service provision of in accordance with the standards MEST EN 13850 and MEST EN 14012, in line with Rulebook on detailed conditions for the provision of universal postal service. Depending on the analysis results of the Quality Measurement Report on the Provision of Universal Postal Service for 2025, the Agency will undertake appropriate regulatory measures to ensure the prescribed quality level of this service. In 2026, with the aim of verifying the results presented in the Annual Report regarding quality measurement of the provision of universal postal service of Pošta Crne Gore, the Agency will carry out an audit of the implemented measurements and reported results. The Agency will engage an independent institution to perform the audit of the conducted measurements, as provided for in the Rulebook on Detailed Conditions for the Provision of the Universal Postal Service.

E. Radio-Frequency Spectrum Management

Management of radio-frequency spectrum, as a limited natural resource, includes planning, allocation, coordination, monitoring and control of the use of radio-frequency spectrum. Pursuant to Article 56 of the Law, the Agency manages the radio-frequency spectrum and plans the use of satellite orbits in accordance with the Radio Regulations of the International Telecommunication Union (ITU), other international agreements, and the Law.

Within the planning activities related to management of the radio-frequency spectrum, the most significant ongoing activities aimed at the efficient use of radio frequencies are:

- granting authorisations for the use of radio frequencies (radio-frequency assignments);
- control and monitoring of radio-frequency spectrum, and
- international coordination of radio frequencies.

1. Radio-Frequency Spectrum Control and Monitoring

Article 179(10) of the Law defines the Agency's competence to carry out monitoring and control of radio-frequency (RF) spectrum. Article 56 of the Law defines that RF spectrum management, in addition to planning, coordination and assignment, also includes monitoring

and control of RF spectrum use. Article 87 of the same Law stipulates that the Agency shall perform monitoring and control of the RF spectrum in accordance with the Law and relevant regulations of the International Telecommunication Union (ITU) and the European Conference of Postal and Telecommunications Administrations (CEPT). In this regard, the Agency shall plan, develop and improve the system for monitoring and control of the RF spectrum (the System). The Law defines the System as being of special interest for Montenegro, as part of the national critical infrastructure and national security system.

Within the process of monitoring and control of the RF spectrum, the Agency shall, in particular:

- perform appropriate measurements of radio emission parameters in order to determine the occupancy of specific RF bands;
- determine the source and location and identify illegal radio emissions and sources of harmful interference, and
- perform appropriate measurements of radio emission parameters in order to verify compliance with the conditions for the use of radio frequencies specified in the relevant authorisation.

Monitoring and Control of the RF spectrum will be carried out using the existing fixed monitoring and control stations interconnected in a single system within their coverage areas, namely from: the Main Monitoring and Control Centre - Dajbabska Gora (GKMC), the Regional Monitoring and Control Centre - Crni Rt near Sutomore (RKMC), Remotely Controlled Monitoring and Measurement Station - Crljenice (DUKMS Pljevlja), Remotely Controlled Monitoring and Measurement Station - Bijela Crkva (DUKMS Rožaje), Remotely Controlled Monitoring and Measurement Station - Trojica (DUKMS Kotor), Remotely Controlled Monitoring and Measurement Station - Bijela Gora (DUKMS Ulcinj), and Remotely Controlled Monitoring and Measurement Station - Mrkošnica (DUKMS Nikšić).

In areas of Montenegro not covered by the existing system of fixed monitoring stations, monitoring and control of the RF spectrum will be carried out using the Mobile Monitoring and Control Station (MKMS).

In addition to the above monitoring stations, in order to determine the source, location and identification of illegal radio emissions and sources of harmful interference in the 10 kHz to 43 GHz frequency band throughout the country, portable monitoring and measurement equipment will also be used.

Activities related to the monitoring and control of the RF spectrum will be defined in the Plan for Regular Monitoring and Control of the RF Spectrum in 2026.

2. Radio-frequency Planning and Assignment

Pursuant to Article 56 of the Law, radio-frequency (RF) spectrum management includes the planning, coordination, assignment, monitoring and control of the use of the RF spectrum, with the aim of enabling the effective and efficient use of this limited resource and ensuring the

operation of radio stations without interference, while respecting the principles of objectivity, transparency, competitiveness, non-discrimination and proportionality.

During 2026, activities related to planning of the radio-frequency use and granting the authorisations for the use of radio frequencies will be carried out, as well as adoption of decisions determining annual regulatory fees related to the use of radio frequencies, the assignment of call signs/MMSI numbers for radio stations in the maritime mobile service (MMS stations), and the maintenance of the relevant registers and records.

In accordance with the RF Spectrum Allocation Plan adopted in 2025, which determines the allocation and basic conditions for the use of RF bands in line with the Law, the Radio Regulations (2024), the European Common Allocation Table (January 2025), other decisions and recommendations at the level of the European Union and CEPT, as well as international treaties and agreements to which Montenegro is a signatory, the Agency will, where necessary in 2026, carry out appropriate amendments or, where appropriate, adopt new band-specific allocation plans for certain radio-frequency ranges.

Through the relevant allocation plans, the Agency will determine the allocation of frequency bands to radio-frequency channels, the detailed conditions and manner of use, as well as the method of assigning radio frequencies, in accordance with the aforementioned international and national acts.

2.1 Amendments to the Radio-frequency Allocation Plan for the 174–230 MHz and 470–694 MHz Bands for DTT and T-DAB

Taking into account the expectation that the Adriatic-Ionian Group will complete in 2026 the coordination procedure for radio frequencies in the 174–230 MHz band, which is allocated to the broadcasting service and primarily intended for the introduction of digital terrestrial radio (DAB+), as well as harmonisation of the text of the multilateral agreement between the administrations responsible for coordination activities in Albania, Montenegro, Greece, Croatia, Italy and Slovenia, signing of the agreement will be organised at a meeting hosted by the administration of Croatia.

Following the signing of this agreement, the activities arising from the agreement will be subsequently undertaken. These activities relate to the revision of the international plan that forms an integral part of the Geneva 2006 Agreement, and subsequently to the amendments to the Radio-frequency Allocation Plan for the 174–230 MHz and 470–694 MHz bands for DTT and T-DAB systems, adopted by the Agency in 2018.

The amendments will relate to the rights and obligations of Montenegro regarding the use of resources within the 174–230 MHz band, in order to harmonise the plan with the rights and obligations acquired by Montenegro concerning the use of these resources, i.e., specific radio-frequency blocks at particular locations and the corresponding operational parameters of DAB+ terrestrial transmitters.

3. Verification of Compliance with Authorisation Requirements for the Use of Radio Frequencies for the Implementation of MFCN Systems

Within the public tender procedures conducted in 2016, 2022 and 2023 for granting authorisations for the use of radio frequencies in the 700 MHz, 800 MHz, 900 MHz, 1800 MHz, 2 GHz, 2.6 GHz and 3.6 GHz bands for the implementation of public mobile electronic communications networks (MFCN systems), obligations were imposed on mobile operators regarding the scope and timeline of network signal coverage, including requirements related to service quality.

Taking into account the requirements from all authorisations for the use of radio frequencies for MFCN systems cumulatively, each mobile operator is required to ensure, by the end of 2026, the following:

- network signal coverage of at least 99% of the population of Montenegro in terms of availability of voice telephony and SMS services;
- network signal coverage of at least 98% of the population of Montenegro in terms of availability of data transmission services according to the 10/3 Mbps criterion based on user experience;
- network signal coverage of at least 75% of the population of Montenegro (50% in each municipality) in terms of availability of data transmission services according to the 30/10 Mbps criterion based on user experience;
- continuous network signal coverage (4G (LTE) and/or 5G (NR)) along all motorways and all main roads in Montenegro;
- network signal coverage of parts of the Skadar Lake waters belonging to Montenegro, the Bay of Kotor waters, and parts of the territorial waters of Montenegro up to 1 nautical mile from the coast.

Compliance with the requirements regarding network signal coverage, including those related to the quality of data transmission services, shall be verified using one or more of the following methods:

- assessment of the level of network signal coverage based on software prediction of received field strength;
- measurement of data transmission service quality parameters using specialised measurement equipment at fixed locations and while in motion;
- measurement of data transmission service quality parameters at the end-user location using an authorised user application (e.g., EKIP NetTest) installed on a standard mobile terminal;
- analysis of relevant data obtained from the network of the holder of the authorisation for the use of radio frequencies.

The Agency shall carry out the verification of compliance with the requirements contained in the authorisations for the use of radio frequencies in the 700 MHz, 800 MHz, 900 MHz, 1800

MHz, 2 GHz, 2.6 GHz and 3.6 GHz bands for the implementation of public mobile electronic communications networks in the first half of 2027.

The verification of compliance with the requirements will be carried out using the method of assessing the level of network signal coverage based on software prediction of received field strength and the method of measuring data transmission service quality parameters using specialised measurement equipment at fixed locations and while in motion.

During 2026, the Agency will undertake the necessary preparations for an efficient and objective verification of compliance with the requirements. These preparations include the consolidation of relevant data, improvement and verification of the verification methodology, and the provision of the necessary material and technical resources.

The Agency will engage a specialised company to conduct the required measurements of data transmission service quality parameters for the purpose of verifying compliance with the conditions laid down in the authorisations. During 2026, a public procurement procedure will be conducted for the procurement of services related to the measurement of data transmission service quality parameters in public mobile electronic communications networks.

4. Verification of Compliance with Electromagnetic Field Exposure Limits (EMF ELs)

Following the assignment of radio frequencies in the pioneer 5G bands (700 MHz and 3.6 GHz) by the Agency in early 2023, the large-scale deployment of base stations for 5G mobile communication networks, particularly in the 3.6 GHz band, began in early 2024.

Pursuant to the Law on Electronic Communications, the Agency is required, when deciding on applications for authorisations for the use of radio frequencies, to verify compliance with the electromagnetic field (EMF) exposure limits. Furthermore, Article 65 of the Law on Electronic Communications stipulates that the Agency shall reject an application for issuing an authorisation if it determines that granting the radio frequencies would endanger human life and health, the environment, or national security.

This procedure, particularly in the case of 5G NR radio base stations, primarily in the 3.6 GHz band with Adaptive Antenna Systems (AAS) at urban locations with co-located equipment of two or more mobile operators, becomes highly complex. The application of analytical models for determining the shape and dimensions of the exclusion zone for excessive radiation in a large number of such situations does not provide objective results, which can only be reliably established through field measurements.

For the purpose of implementing this statutory obligation, the Agency procured, in mid-2025, a measurement system for measuring electromagnetic field (EMF) levels in the frequency range from 30 MHz to 6 GHz. The measurement system will be used exclusively for the internal needs of the Agency and when required.

5. Verification of Conditions for Establishing a Protection Zone of a Radio Centre or a Protected Radio Corridor

Pursuant to Article 18 of the Law and the Professional Basis for the Rulebook on the method and conditions for determining protection zones of electronic communications networks, electronic communications infrastructure and associated facilities, the width of protection zones and types of radio corridors in which planning and construction of other structures are not permitted, it is prescribed that the owner of a radio centre or radio corridor may submit a request to the Agency for the establishment of a protection zone of a radio centre or a protected radio corridor.

Applicants may include:

- state administration authorities responsible for defence, national security, internal affairs, and protection and rescue;
- emergency services acting in emergency situations, including situations involving protection from natural and other disasters;
- state administration authorities responsible for safety in aviation, maritime transport and inland waterway transport;
- holders of rights to high-power radio stations used for public broadcasting purposes;
- the Agency, for fixed monitoring and measurement stations intended for the control and monitoring of radio-frequency spectrum;
- providers of connectivity services for the above-mentioned entities;
- providers of connectivity services for national critical infrastructure.

Based on a submitted request from the owner of a radio centre or radio corridor, the Agency will issue a decision confirming the fulfilment of conditions for establishing a protection zone of a radio centre or a protected radio corridor, and will maintain databases on the declared protection zones of existing and planned radio centres as well as declared protected radio corridors.

6. Coordination of Radio Frequency Use

Coordination of radio-frequency (RF) spectrum use and notification of radio-frequency assignments are recognised as key activities of the Agency under the Law. In this regard, the Agency shall take all necessary measures to ensure that the use of RF spectrum assigned within the territory of Montenegro does not prevent European Union Member States and non-EU countries from using the harmonised RF spectrum within their territories, particularly due to cross-border harmful interference. In implementing these measures, the Agency takes into account obligations arising from international treaties, particularly the Radio Regulations, European Union legislation, and specific radio-frequency coordination agreements to which Montenegro is a signatory.

During 2026, the Agency will continue activities related to international coordination of radio frequencies with the administrations of relevant countries for the purposes of international fixed

links, fixed/mobile communications networks and terrestrial broadcasting systems. The Agency will take into account that ensuring harmonised use of the RF spectrum is a necessary precondition for the uninterrupted use of this limited resource.

In addition to procedures envisaged by international agreements applied in radio-frequency coordination procedures, the Agency will also continue activities during 2026 related to proposing and implementing measures for eliminating undesired interference originating from emission sources located within the territory of Montenegro or in other countries, as well as maintaining a centralised radio-coordination database containing all relevant data required for the efficient performance of the Agency's activities in the field of international radio-frequency coordination. The aim of these activities is to achieve recognition through registration in international radio-frequency plans for analogue and digital broadcasting, in accordance with: Geneva 2006 Agreement (GE06) for television, Geneva 1984 Agreement (GE84) for FM broadcasting, Geneva 1975 Agreement (GE75) for medium-wave broadcasting, Appendices 30, 30A and 30B of the Radio Regulations for the broadcasting satellite service and fixed satellite service, and other relevant international agreements.

In general, these activities include the preparation of documentation and communication related to the procedures for notification and modification of requests concerning the use of radio frequencies to international s in the field of electronic communications, through the competent state authority, as well as preparing responses to coordination requests from other administrations regarding the use of the RF spectrum.

During 2026, the Agency will continue cooperation with the administrations of neighbouring countries in order to monitor the implementation of the signed agreements on coordination of the use of specific RF bands.

6.1 Resolution of Harmful Interference in the 694–790 MHz Band

During 2026, communication with the competent institutions of the Republic of Albania will continue in order to complete the transition process and the final release of the 694–790 MHz band, particularly the 703–733 MHz segment (TV channels 50–53), from digital terrestrial broadcasting systems throughout the territory of Albania. Furthermore, in 2026 additional previously initiated activities with the administration of the Republic of Albania will continue regarding the use of radio frequencies in other bands important for the uninterrupted operation of existing and planned radiocommunication systems in Montenegro.

6.2 Resolution of Harmful Interference in the 2.6 GHz and 3.6 GHz Bands in LTE/NR Networks

During 2026, activities initiated in 2025 with the competent institutions of the Republic of Italy will be intensified with the aim of defining regulatory and technical measures for the permanent resolution of the problem of harmful interference in the unpaired part of the 2.6 GHz band.

This harmful interference results in degradation of the signal-to-noise ratio on the uplink in practically all LTE2600 TDD cells of the mobile operator One Crna Gora in the coastal area of Montenegro.

Based on theoretical analyses and measurements conducted in 2024, the Agency's experts determined that the source of the interference is the signal of the Italian mobile operator Wind Tre, which uses the same frequency blocks for its LTE2600 TDD network, while the unexpectedly high signal levels on the Montenegrin coast are caused by the radio wave propagation phenomenon known as "tropospheric ducting", occurring under specific atmospheric conditions.

At the beginning of 2025, radio-frequency coordination activities in this band were initiated with the administration of Italy. In accordance with preliminary discussions during meetings with representatives of the Italian administration, a Draft Technical Agreement on Cross-Border Coordination of Mobile/Fixed Communication Networks Operating in TDD Mode in the 2570–2620 MHz band due to the tropospheric ducting effect was prepared and submitted to them for comments.

During the meetings held in 2025, it was further concluded that the specific operational configuration of the Italian operator in this band also contributes to elevated field strength values and, consequently, to degradation of the Montenegrin operator's signal along the coast during the summer months. Given the complexity of this issue, it is expected that cooperation with the competent institutions of the Republic of Italy will continue during 2026 in order to define regulatory and technical measures for the permanent resolution of this problem, including the signing of the aforementioned technical cross-border coordination agreement.

The Agency will also work during 2026 on resolving harmful interference in the 3.6 GHz band in 5G networks. Since April 2025, mobile operators in Montenegro have reported degradation of the uplink signal-to-noise ratio of NR radio base stations in the areas of Podgorica, Zeta, Tuzi, Ulcinj and Bar, as well as on cells directed towards the open sea in other coastal municipalities.

Based on analyses of the spatial and temporal distribution of the interference, the initial assumption is that the problem affecting base stations located near the border with the Republic of Albania originates from unsynchronised NR radio base stations in that neighbouring country, while the problem affecting base stations directed towards the open sea is likely caused by the tropospheric ducting effect, similar to the phenomenon observed in the 2.6 GHz band.

6.3 Activities for Securing an Entry in the Broadcasting-Satellite Service Plans in Preparation for the World Radiocommunication Conference (WRC-27)

In 2024, the Agency initiated the procedure under Appendices 30 and 30A of the Radio Regulations, with the aim of securing a new entry in the Broadcasting-Satellite Service (BSS) Plans with 10 channels at the forthcoming World Radiocommunication Conference (WRC-27),

taking into account that Montenegro currently does not have an entry in the plans of these appendices, unlike other administrations that are members of the ITU.

In this regard, in accordance with the decisions of the previous World Radiocommunication Conference (WRC-23), which enabled administrations without entries in RR Appendices 30 and 30A to benefit from the results of WRC-23, particularly with respect to the implementation of Resolution 559 (WRC-19), the Agency requested the assistance of the ITU-R Radiocommunication Bureau in identifying a suitable orbital position and RF channels for its intended entry in the BSS Plans.

Following the aforementioned cooperation with the ITU-R Bureau, the Agency submitted a coordination request concerning the orbital position and network characteristics intended for national coverage of the territory of Montenegro, which was published in Special Section No. AP30/E/952 of the ITU BR IFIC 3045 dated 29 April 2025.

The radio-frequency coordination procedure in the planned RF bands covered by the above-mentioned Appendices of the Radio Regulations, as well as the corresponding positions in the geostationary satellite orbit, is highly demanding and typically lasts for several years, due to the intensive global utilisation of these resources. Accordingly, the Agency will continue the initiated coordination procedure in 2026, with the aim of completing it before WRC-27 and securing Montenegro's right to record the requested resources in the relevant international plans.

6.4 Notification and Recording of Radio-Frequency Assignments in the ITU Master International Frequency Register (MIFR)

The notification of RF assignments, in accordance with the provisions of the Radio Regulations (RR), is planned as a separate activity. Provided that all regulatory requirements prescribed by this instrument are met, such assignments obtain the status of recording in the Master International Frequency Register (MIFR) of the ITU, which grants international recognition and the right to protection against harmful interference from any station of another administration.

The procedure for notifying RF assignments to the MIFR has been very rarely applied to stations operating in services for which certain frequency bands are allocated on a primary basis under Article 5 of the RR (Radio Regulations), for which the coordination procedure is not explicitly required under the RR and which have been assigned at the national level to other services. This includes, for example, bands allocated on a primary basis to the mobile service such as 700 MHz, 800 MHz, 900 MHz, 1800 MHz, 2.1 GHz, 2.6 GHz, 3.6 GHz, and 26 GHz, identified for IMT, which in European countries and numerous other countries worldwide are used exclusively for radio base stations in the mobile service on an exclusive basis.

However, at World Radiocommunication Conferences (WRC), an increasing number of frequency bands are being allocated on a shared basis between different services with equal

status, with mandatory harmonisation of station operation based on technical and operational criteria.

At the forthcoming WRC-27, a number of bands will be considered in this context, even though they are in practice already fully utilised by a particular service. This gives a new dimension to the purpose of notifying assignments to the MIFR, and therefore the Agency began such notifications during 2025 and will continue notifying RF assignments to the MIFR for stations in relevant services during 2026.

6.5 Accession to the Agreement on the Coordination of Radio Frequencies in the Frequency Ranges 29.7 MHz-43.5 GHz for the Fixed Service and the Land Mobile Service (HCM Agreement)

In 2026, initial steps are envisaged for the accession of the Agency, as the competent regulatory authority on behalf of Montenegro, to the Agreement on the Coordination of Radio Frequencies in the Frequency Ranges 29.7 MHz-43.5 GHz for the Fixed Service and the Land Mobile Service (HCM Agreement), subject to the fulfilment of the necessary conditions.

The signatories of this agreement are the competent administrations of Austria, Belgium, the Czech Republic, Germany, France, Hungary, the Netherlands, Croatia, Italy, Liechtenstein, Lithuania, Luxembourg, Poland, Romania, the Slovak Republic, Slovenia and Switzerland.

Accession to the Agreement requires the consent of all signatory states. The objective of this technical agreement is to ensure optimal use of radio frequencies within individual frequency bands assigned to systems in the fixed and mobile services, as well as to prevent harmful interference which may be caused by stations operating in the aforementioned radiocommunication services within the specified range of the radio spectrum. The Agreement is updated as necessary based on proposals submitted by the signatories within the Expert Group for the fixed service and the expert group for the mobile service, each of which holds one meeting per year. Subsequently, the proposals are considered at the annual plenary meeting, where, after harmonisation, amendments to the HCM Agreement are adopted.

7. Introduction of Digital Radio in Montenegro

Pursuant to the Law on Electronic Communications, the Agency adopted in 2025 the Rulebook on the interoperability of car radio receivers and consumer radio receivers and consumer digital television equipment and the conditions for the transition to new standards in the field of broadcasting, which is the transposition of Article 113 of Directive (EU) 2018/1972 of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code.

The adoption of this Rulebook aimed to contribute to the process of introducing digital radio in Montenegro. Therefore, during 2026 the Agency will continue activities in accordance with the legal framework and secondary legislation within its competence, as well as other activities,

including continued participation of the Agency's representatives in the inter-institutional working group.

The inter-institutional working group, established by the Ministry of Economic Development in 2025, has the mandate to prepare amendments to the Law on Digital Broadcasting in order to ensure an adequate legal basis for the introduction of digital radio, as well as a prerequisite for financial support to this process.

Furthermore, with regard to the introduction of digital radio, the Agency will continue cooperation with all stakeholders involved in this process, particularly with the ministries responsible for electronic communications, culture and media, the authority responsible for audiovisual media services, the Broadcasting Centre, and Radio Television of Montenegro, which all participate in this working group.

Taking into account that, following the implementation of the provisions of Directive (EU) 2018/1972, as well as the completion of the multilateral Adriatic-Ionian Agreement, further development of activities at the regional level aimed at promoting and ensuring the availability of digital terrestrial radio is expected, the Agency will, in accordance with its capacities, participate during 2026 in relevant activities and potential regional projects.

F. Management of Numbering Resources

Pursuant to Article 94 of the Law the Agency shall manage numbering resources. As defined by the Law, management of numbering resources shall include planning, use and assignment of numbering resources as limited resources in the manner to ensure their rationale, equal and efficient use, in accordance with the numbering plan.

1. Granting Approvals for the Use of Numbering Resources

In Accordance with the Law and the best European practice, the activities on implementation of the Agency's competences relating to determining the manner of the numbering use and granting the authorisation for their use.

2. Operator Switching and Number Portability

In 2025, the Agency adopted the Rulebook on Operator Switching and Number Portability ("Official Gazette of Montenegro", No. 100/25), which sets out in more detail the procedures for switching operators in fixed and mobile networks, the rights and obligations of end-users and operators, the rules on number portability, as well as the manner for submission, validation, and processing of requests. The operator switching service in the electronic communications market in Montenegro was introduced for the first time by the Law on Electronic Communications ("Official Gazette of Montenegro", No. 100/24). The procedure is carried out through the Information System for Operator Switching (ISPO), which ensures reliable and transparent data exchange between all participants, as well as technical implementation of switching based on the "Make Before Break" principle. The Rulebook also prescribes deadlines

for the processing of switching requests, operators' obligations to inform users, the possibility for users to withdraw requests, as well as the right to compensation in case of delays.

The Rulebook will apply from April 2026, by which time the Information System for Operator Switching is to be implemented, tested, and put into operation. Operators are required to align their operations with all provisions of this act no later than that date. In 2026, the Agency will continue to monitor operators' compliance with the provisions of the Rulebook and to further improve ISPO in line with best European practice. The development of a technical solution for a new ISPO is planned, as a single and automated platform for the operator switching and number portability process, as well as the initiation of a public procurement procedure for its implementation and the appointment of a system administrator.

3. Informing the citizens of the Single European Emergency Number 112 and Other Emergency Numbers

In 2026, in cooperation with the state administration authority responsible for protection and rescue, namely the Directorate for Protection and Rescue within the Ministry of the Interior, the Agency will continue to ensure that citizens are informed, in an appropriate and publicly accessible manner, about the Single European Emergency Number 112. The Agency will also continue activities aimed at improving the operation of the 112 service by fulfilling the obligations arising from the secondary legislation governing the implementation of the 112 number, which is expected to be adopted by the end of 2025.

Following the workshop on the implementation of the Public Warning System (PWS), held in early 2025, the International Telecommunication Union (ITU) continued to support Montenegro in the implementation of this project by engaging an expert to prepare a Feasibility Study for the implementation of the Public Warning System (PWS) in Montenegro. The Study is scheduled to be presented in Podgorica at the end of January 2026. To facilitate this activity, the Agency established, in 2025, a Working Group for the coordination and monitoring of the PWS implementation process.

In 2026, the Agency will continue to cooperate with the competent ministry, the Ministry of the Interior, namely the Directorate for Emergency Management, and the ITU on the implementation of the *Public Warning System*, including *Cell Broadcast*, *Location-based SMS* and the *Dissemination of Warnings through Other Channels* (OTT services, social media, etc.). The system will support the following categories of alerts: Presidential Alert, Extreme Alert, Severe Alert, Public Safety Alert, Amber Alert, and Test Alerts. The Agency will also coordinate the implementation of this system with electronic communications operators.

Furthermore, with the aim of ensuring the highest possible quality of electronic communications services, the Agency will cooperate with EPCG, CEDIS and electronic communications operators to improve the reliability of the electricity supply to operators' facilities and facilities owned by the Agency, with particular emphasis on increasing the use of electricity generated from renewable energy sources.

The Agency will continue its activities aimed at enabling access to the emergency number 112 through other mobile networks in Montenegro when the user's home network is unavailable, as well as enabling the use of services provided by other operators (national roaming) in emergency situations. In this regard, the Agency will carry out periodic testing of these functionalities.

In addition, during 2026 the Agency will continue to pursue the initiative for the implementation of an SOS alarm service intended for vulnerable groups by engaging with the competent ministry and other relevant public authorities. Should the initiative be accepted, the Agency will coordinate the implementation of this system with electronic communications operators.

4. Provision of Numbering Resources for Machine-to-Machine (M2M) Communications

M2M is a developing business area that has entered a phase of significant growth and is becoming a new business segment for operators of electronic communications networks. Operators need to enable the connectivity required to maintain communication between different machines and sensors, and for that purpose appropriate regulatory conditions and adequate numbering resources must be provided.

In 2025, the Numbering Plan was adopted, extending the deadline by which all national numbers used for machine-to-machine (M2M) communications services that are not within the range with the SDN code “71” must be replaced with national numbers with the SDN code “71” no later than 1 December 2026.

In 2026, monitoring of the need for numbering resources for M2M will continue, including the issuance of appropriate authorisations for their use upon request by operators and the monitoring of operators’ activities related to the withdrawal of numbers previously used for these purposes.

G. Users’ Rights and Protection of Interests

1. Conduct of Procedures for the Protection of Rights and Interests of Users of Electronic Communications and Postal Services

An end-user of publicly available electronic communications services has the right to file a complaint with the operator concerning access to and quality of services, provision of services, and charges applied in invoices for services provided, as well as complaints due to breaches of contractual provisions and violations of rights concerning the protection of access to the open internet.

The end-user will submit a complaint to the operator after identifying the irregularity, without delay and no later than 15 days from the date of becoming aware of the action or omission of the operator, and a complaint regarding the invoice for services and the quality of services within 30 days from the date of receipt of the invoice or from the date the service was provided, in written or electronic form.

The operator shall decide on the complaint within 15 days from the date of its receipt, deliver a reasoned decision to the end-user in written or electronic form, and maintain records thereof. If the operator rejects the end-user's complaint or fails to decide within the prescribed period, the end-user has the right, within 30 days from the date of receipt of the operator's decision, to submit a request to the Agency for out-of-court dispute resolution, in written or electronic form, in accordance with the law governing consumer protection.

The Agency shall decide on the request within 60 days from the date of its receipt. An administrative dispute may be initiated against the Agency's decisions. A request for out-of-court dispute resolution does not exclude the right of the end-user to initiate proceedings before the competent court.

Through activities aimed at improving user awareness and education regarding basic user rights, the Agency contributed to an increase in the number of complaints submitted by users up to 2019, after which a downward trend was recorded in the number of procedures conducted before the Agency based on complaints from users of publicly available electronic communications services. This represents a significant positive change in the manner in which operators resolve user complaints and indicates that the Agency's dedicated work on each submission by users and the implementation of the necessary measures in accordance with the law and secondary legislation has resulted in a more committed and more responsible approach by operators to user complaints.

In 2026, the Agency will conduct procedures based on user complaints in accordance with the Law on Administrative Procedure and the Law on Electronic Communications. A request for out-of-court dispute resolution may be submitted in person at the Agency's premises, by post to the Agency's registered address, by e-mail to: zastitakorisnika@ekip.me, or through the application Central Information System for Consumer Protection at www.potrosac.me.

The new Law on Electronic Communications defines different deadlines and a broader scope of rights for end-users compared to the previous law. Therefore, the Agency shall adopt implementing regulations within one year from the date the Law enters into force, while operators are required to harmonise their operations with the Law within 12 months from the date of its entry into force.

Some of the new rights of end-users include: the right to a contract summary, stronger protection regarding the use of value-added services, enhanced rights concerning number portability, guaranteed quality of services, particularly in the segment of open internet access services, broader rights regarding the termination of contracts where the operator cannot fulfil

the agreed service, greater transparency of contractual conditions, enhanced rights concerning the unlocking of terminal equipment when switching to another network, protection against malicious and nuisance calls, and other rights.

Protection of users of postal services is regulated by the Postal Services Act, Chapter II Postal Services – Section 5 Protection of Service Users and Dispute Resolution. The procedure for filing a complaint with the operator, the procedure for submitting an objection to the Agency, and the grounds for submitting a complaint or objection are prescribed. Considering the trend of an increased number of users who contacted the Agency with various requests during 2025, an increase in the number of user complaints and requests for the supervision of postal operators' activities is expected. In 2026, the Agency will decide on complaints submitted by users against decisions of postal operators and provide clarifications and answers to questions from users of postal services.

During the preparation of the Work Plan for 2026, testing is being carried out regarding the possibility for users to submit complaints and objections electronically via the Agency's website www.ekip.me. In 2026, the Agency will work on improving this method of communication with users.

2. Monitoring of Operators' Offers and Changes to Contractual Conditions for Service Provision

Operators of publicly available electronic communications services increasingly offer a wide range of service packages with various combinations of services available to their users. Operators notify the Agency of their service offers and any amendments thereto eight days prior to the publication of the price list on their website. The Agency verifies their compliance with the law, particularly with regard to the principles of transparency, non-discrimination, price structure, and method of charging services on a single basis, among others.

Operators shall also notify their subscribers of any changes to the conditions established in the subscriber contract at least 30 days prior to such changes. This notification shall be provided in written form, as a mandatory form of communication, in a clear, visible and unambiguous manner, where possible, with additional notification via SMS. Within the indicated period, subscribers shall be given the possibility to terminate the contract if the changes are less favourable compared to contractual terms and conditions and prices. In such cases, the Agency assesses the compliance of the text of the written notification that the operator sends to subscribers before the notification is delivered to them.

In 2026, the Agency will assess the compliance of submitted offers and price lists of operators, as well as any changes to contractual conditions, particularly those that are less favourable to users of their services, and will react in a timely manner in accordance with the law where necessary.

In addition, during 2026 the Agency will continue to provide links on its website to the webpages where electronic communications operators publish their service price lists.

3. General Terms and Conditions for the Provision of Services

During 2026, operators will be obliged to amend their general terms and conditions for the provision of services in order to align them with the new Law on Electronic Communications and new secondary legislation adopted on the basis of that law. The Agency will verify their compliance and issue approvals, while closely monitoring the implementation of these acts, particularly from the perspective of ensuring equal access to networks and services for persons with disabilities.

In accordance with the obligations established by the secondary legislation, the Agency will further adapt its own website and the request form for out-of-court dispute resolution to the needs of persons with disabilities, in order to enable them to submit requests electronically.

At the same time, during 2026 the Agency will continue to verify the compliance of the general terms and conditions for the provision of postal services with the Law on Postal Services, issue approvals for the general terms and conditions governing the provision of the universal postal service by the universal postal operator, and publish on its website the general terms and conditions of postal service provision by postal operators.

4. Subscriber Contracts

After obtaining the Agency's approval for general terms and conditions for the provision of services, operators shall submit to the Agency new templates of subscriber contracts for approval. During 2026, the Agency will carry out a detailed assessment of their compliance with the Law on Electronic Communications. In 2026, the Agency will publish on its website the standard subscriber contracts for which approval has been granted. At the same time, the Agency will continuously monitor the implementation of the contract summary in practice as a new obligation prescribed by the Law on Electronic Communications. The contract summary template was established by an act of the Agency adopted in 2025.

5. Quality of Electronic Communications Services

In accordance with Article 142 of the Law, the Agency shall monitor the quality of electronic communications services provided in Montenegro during 2026, publish comparative parameters of the quality of electronic communications services on its website, and provide operators with recommendations for improving service quality.

6. System for Measuring Internet Access Speed

Pursuant to Article 155 of the Law on Electronic Communications, the Agency shall allow end users to measure Internet access speed that can be used when filing a complaint regarding the agreed Internet access speed in fixed electronic communications network.

In 2019, the Agency launched a system for measuring and analysing the quality of internet access services, "EKIP NetTest". The EKIP NetTest system enables the measurement of

quality-of-service parameters for internet access in both fixed and mobile networks in Montenegro. With more than 80 parameters being measured, it is likely the most comprehensive measurement tool available on the market. The system is fully compliant with the 2014 Report of the Body of European Regulators for Electronic Communications (BEREC), which recommends quality parameters for internet connections. The measurement server is located at the Internet Exchange Point (MIXP) in Montenegro, ensuring that users of all operators are in an equal position when measuring quality of service parameters for internet access, i.e., allowing the obtained measurement results to be comparable. The results are georeferenced and displayed on a geographical map. The internet speed measurement results obtained using this system may be used as a basis for submitting complaints in cases of deviation from the contractually agreed internet access speeds.

The Law on Electronic Communications provides that the Agency shall enable users to measure internet access speeds, which may be used when submitting complaints regarding the contracted internet access speed in a fixed electronic communications network.

In 2026, the Agency will work on further upgrading the existing system in order to monitor the availability and quality of internet access services.

7. Monitoring the Compliance with the Principles of Net Neutrality in Montenegro

Net neutrality refers to the level of control of access to the content and speed of internet access by the internet access service provider. In 2025 new bylaws providing more detailed regulation of this issue were adopted.

In 2026, the Agency will monitor compliance with the principles of net neutrality, propose measures to improve compliance, and take appropriate measures in cases of identified discrimination and network traffic management practices.

8. Tool to Assist Users in Choosing Electronic Communications Services (Price Calculator)

The Law on Electronic Communications stipulates that the Agency shall provide end-users, through its website, access to an independent comparison and assessment tool for internet access services and publicly available number-based interpersonal communications services and, where applicable, publicly available number-independent interpersonal communications services. This tool enables comparison with regard to service prices, which are provided in exchange for recurring monetary payments or payments based on consumption, as well as service quality, where a minimum quality of service is offered or where operators are required to publish such data. In order to implement this provision, the Agency developed and implemented an appropriate tool in 2015 – the Price Calculator, which is available to users on the Agency's website.

During 2026, the Agency will continue to maintain the established Price Calculator, require operators to regularly update the prices and service offers in the Calculator, approve accurate

tariffs, and return for revision those that are not aligned with operators' official communications and price lists. At the same time, the Agency will also work on developing additional ways of providing information on the prices of electronic communications services.

The Agency will further upgrade the existing Calculator so that end-users can compare available offers and services not only on the basis of price, but also on the basis of service quality, where a minimum quality of service is offered or where operators are required to publish such information.

9. Activities Related to Communication with the Public

During 2026, the Agency will initiate the preparation and adoption of a framework communication plan for communication with the public. This plan will systematically regulate internal and external communication activities, defining objectives, target groups, communication channels, key messages, as well as mechanisms for monitoring and evaluating the effects of communication. The main objective of this plan will be to strengthen the Agency's brand and improve its public image as a recognizable, reliable, competent and independent regulatory authority operating in accordance with the applicable legal and regulatory framework in the field of electronic communications and postal services in Montenegro.

Through implementation of planned activities, it is expected to increase the visibility and public positioning of the Agency, improve user awareness and education regarding modern electronic communications and postal services, their safe use, user rights, and the available mechanisms for the protection of their interests.

Within the implementation of the Framework Communication Plan, the Agency will carry out activities aimed at improving communication channels and implementing a rebranding process and enhancement of the visual identity, including the modernisation of the official website, optimisation of the Agency's presence on social and professional networks, as well as consideration of establishing official channels for distribution of multimedia content. For the implementation of these activities, it will be necessary to plan appropriate financial resources within the Agency's Financial Plan for 2026.

10. Public Opinion Surveys

The research indicates that a significant number of users of electronic communications and postal services are not familiar with their rights and the procedures for their protection. In order to ensure that a larger number of users become informed about the procedures for the protection of rights in the field of electronic communications and postal services, the Agency will, during 2026, prepare and distribute appropriate educational materials for users and issue public statements and notices through the media and social networks, particularly regarding users' rights under the Law on Electronic Communications and the Postal Services Act.

In previous years, the Agency has regularly conducted research on the use of information and communication technologies in Montenegro. A similar survey regarding user satisfaction with

the prices and quality of electronic communications services will also be conducted during 2026. The purpose of this research will be to assess the level of user satisfaction with electronic communications services in Montenegro, including satisfaction with fixed and mobile telephony services, internet services, and distribution of television and radio programmes, awareness of emergency service numbers, as well as the level of awareness of users' rights related to electronic communications services and the competences of the Agency.

During 2026, the Agency will also conduct a survey on user satisfaction with postal services, focusing on the offer and quality of the provision of postal services in Montenegro. The survey will include the examination of the dynamics of service use, the methods by which users select postal operators, as well as expectations regarding new services that are already offered or should be introduced on the postal services market. The survey will also include an examination of the frequency and volume of the use of postal network units, as well as certain representative postal services, the level of satisfaction with prices and delivery timeframes (service quality) of specific postal services, awareness of the procedures for the protection of users' rights, and the extent of the use of e-commerce. An integral part of the research will also include the question of the replaceability of postal services by services in the field of electronic communications, that is, the assessment of the impact of digitalisation on the use of postal services.

11. Monitoring the Operation of the National Internet Traffic Exchange Point in Montenegro (MIXP)

During 2013, the Agency prepared a study on the organisation and establishment of a national Internet Exchange Point (IXP) in Montenegro. The study demonstrated that the establishment of an IXP in Montenegro would foster internet development, reduce service prices, relieve international connectivity links, improve the quality of internet access services, and enhance communication security. In accordance with this study, in July 2015 the National Internet Exchange Point in Montenegro (MIXP) was put into operation. It is located at the premises of the University of Montenegro (Information System Centre). The following stakeholders participated in ensuring the conditions for the implementation of MIXP: the competent Ministry, the Agency, operators of electronic communications in Montenegro, the University of Montenegro, the International Telecommunication Union (ITU), and international Internet organisations.

In 2026, the Agency will continue cooperation with the University of Montenegro, the Ministry of Economic Development, operators providing internet services, and other interested stakeholders, with the aim of further developing MIXP and ensuring that all internet service providers and competent public administration authorities are connected to MIXP.

H. Planning of Electronic Communications Networks and Electronic Communications Infrastructure

The Law on Electronic Communications, the Law on Spatial Planning, and the Law on Construction prescribe the obligations of the Agency, upon request of the entity responsible for preparatory activities related to the drafting and adoption of a planning document, to provide data on existing and planned electronic communications networks, electronic communications infrastructure and associated facilities within the scope of the planning document. The laws also oblige the Agency to issue an opinion on the Draft planning document, to grant approval to the Draft Planning Document, to grant approval to the main design in the procedure for issuing a construction permit, and to define conditions issued by the competent authority for technical requirements (technical conditions for state and local facilities of general interest), in accordance with special regulations.

During 2026, the Agency will, upon request, provide available data as well as its proposals, opinions, approvals, and conditions.

I. Security of Electronic Communications

In 2026, the Agency will continue activities aimed at preventing damage to elements of electronic communications networks and interruptions in the provision of electronic cooperation with authorities responsible for issuing construction permits, their training, improved spatial planning, enhancement of the quality of technical conditions, warning contractors about the risks of damage to electronic communications networks and the consequences thereof, and informing contractors and the public sector about the existence of a georeferenced database of electronic communications infrastructure, the data contained therein, and their use.

The Agency will also act in accordance with any amendments to the Law, should new competences be prescribed regarding the implementation of the 5G Toolbox and the security of electronic communications networks and services.

In accordance with the Rulebook on the conditions and manner of preventing and combating misuse and fraud in the provision of electronic mail services (“Official Gazette of Montenegro”, No. 37/18), the Agency established, in 2019, an electronic register containing telephone numbers and e-mail addresses of users who do not wish to receive electronic messages or telephone calls for direct marketing purposes.

In 2026, the Agency will continue to monitor the implementation of the aforementioned Rulebook by operators of electronic communications services and entities engaged in the distribution of electronic messages, and will work on improving and promoting the register containing telephone numbers and e-mail addresses of users who do not wish to receive electronic messages or telephone calls for direct marketing purposes.

J. Supervision in the Field of Electronic Communications and Postal Services

1. Inspection Supervision in the Field of Electronic Communications

The Agency performs inspection supervision in the field of electronic communications, in accordance with the competences defined in Articles 179 and 210–215 of the Law on Electronic Communications. Inspection supervision over the implementation of this Law and regulations adopted on the basis thereof is carried out by inspectors for electronic communications. Inspectors for electronic communications perform supervisory tasks in accordance with the Law on Electronic Communications and the Law on Inspection Supervision (“Official Gazette of Montenegro”, Nos. 39/03, 76/09, 57/11, 18/14, 11/15, 52/16, and 84/24).

Regular inspection supervision in 2026 will be carried out at operators registered with the Agency, broadcasting entities, and holders of functional networks/systems, in accordance with the Supervision Plan in the field of electronic communications for 2026. Extraordinary inspection supervision will be carried out as required and based on submitted initiatives for initiating inspection procedures.

2. Professional Supervision in the Field of Postal Services

The Agency performs supervision over the work of postal operators, in accordance with the provisions of Articles 106, 109 and 109a of the Postal Services Act. Supervisory activities in the field of postal services are carried out by postal supervisors. Postal supervisors perform supervisory tasks in accordance with the Postal Services Act and the Law on Inspection Supervision (Official Gazette of Montenegro, Nos. 39/03, 76/09, 57/11, 18/14, 11/15, 52/16, and 84/24).

Pursuant to Article 131(1)(2) of the Law on the Prevention of Money Laundering and Terrorist Financing (“Official Gazette of Montenegro”, Nos. 110/23, 65/24 and 24/25), the Agency shall supervise the implementation of that Law and regulations adopted thereunder, in relation to the obliged entity referred to in Article 4(2)(4) thereof, namely Pošta Crne Gore (Post of Montenegro), the postal operator designated as the universal service provider in the postal services market of Montenegro.

Should amendments to the Postal Services Act be adopted transferring inspection supervision in the field of postal services to the competence of the Agency, the Agency would, in addition to its existing regulatory powers, assume inspection competences in this area, and inspection supervision tasks would be carried out by postal inspectors employed by the Agency. Such a solution would result in a significant expansion of the Agency’s competences in the field of supervision and would require additional strengthening of administrative capacities, both in terms of the number and expertise of inspectors and in terms of ensuring adequate legal support for their work. Considering that a solution is being contemplated whereby inspectors’ decisions would be final, with the possibility of initiating an administrative dispute before the

Administrative Court, it is necessary to ensure a high level of legal certainty and quality in the performance of inspection supervision.

Regular supervision in 2026 will be carried out in accordance with the Supervision Plan in the field of postal services for 2026.

K. Implementation of Measures from Strategic Documents to Which the Agency Contributes

In accordance with the obligations defined by the Digital Transformation Strategy of Montenegro 2022–2026, the Strategy for the Development of 5G Mobile Communication Networks in Montenegro 2023–2027, the Strategy for the Development of Postal Services in Montenegro 2024–2028, as well as other relevant strategic documents, the Agency will actively participate in 2026 in the implementation of measures and activities arising from its competences. Particular focus will be placed on monitoring the progress of strategic indicators and the implementation of activities envisaged by action plans, which contribute to achieving the operational objectives of these strategies.

In addition, the Agency will participate in the implementation of measures and activities defined in other strategic documents, including the Strategy for the Prevention and Suppression of Violent Extremism, Terrorism, Money Laundering and Terrorist Financing 2025–2030, the Action Plan of the National Consumer Protection Programme, as well as the Cybersecurity Strategy of Montenegro 2022–2026.

L. Other Activities of the Agency

During 2026, the Agency will also carry out activities aimed at establishing the basis for exercising the competences of an independent regulatory authority and acting under numerous laws and by-laws adopted on the basis thereof, as well as preparing and submitting reports defined by this regulatory framework. As particularly significant and extensive, the Agency will carry out activities related to improving management and internal controls, conducting public procurement procedures, performing financial and accounting tasks, conducting inventories of fixed assets, implementing occupational safety and health measures, maintaining facilities, equipment and systems, and maintaining and improving the Agency's Information System (in accordance with the Plan for the Development of the Agency's Information System and the improvement of information security).

The Agency will act in accordance with the Law on Payment Transactions, in the part relating to payment transactions of electronic communications service operators within the prescribed exemptions (Article 3(1)(12) of the Law on Payment Transactions). Activities include the receipt of notifications from operators and audit reports, verification of compliance with the

Law, and informing the Central Bank of Montenegro about service providers and any identified irregularities.

With the aim of further improving the system of management and internal controls within the Agency and its full alignment with the Law on Management and Internal Controls in the Public Sector, the Agency has adopted a Risk Management Policy, a Risk Register, and an Action Plan for ensuring adequate risk management. Based on these documents and the defined business objectives, potential risks have been identified and assessed in terms of their probability and impact. The Risk Register is updated at least annually, while the Action Plan defines measures to eliminate or reduce risks to an acceptable level. In this context, during 2026 the Agency will initiate the preparation of a strategic plan as a key planning document for defining medium-term objectives, priorities and development directions, which will serve as a basis for further improvement of the management system, risk management and internal controls. The Agency will also prepare reports on the implementation and improvement of the management and control system, a business continuity plan to ensure the achievement of strategic and operational objectives, an analysis of the effectiveness of internal controls and information exchange systems, internal and external communication within the Agency, a staff training plan, a plan for improving management and internal controls, and will update the Book of Business Process Procedures.

In 2026, the Agency will undertake appropriate activities regarding the certification of systems for measuring and billing electronic communications services, in accordance with the Law.

3.3. Preparation of Plans, Reports and Information on Electronic Communications and Postal Services Markets

During 2026, the Agency will continuously prepare planning and analytical documents ensuring comprehensive monitoring and assessment of developments in the electronic communications and postal sectors. These activities include regular collection, processing and analysis of data obtained from various sources, including operators, public authorities, and relevant international bodies, as well as data generated by the Agency through its own analyses, measurements, research and supervision.

Based on the collected data, comprehensive analytical and information documents are prepared, serving as the main tool for assessing sector developments, monitoring market and investment trends, and evaluating the effects of regulatory measures. These documents are prepared on an annual, semi-annual, quarterly and monthly basis, ensuring continuous and timely information to the Agency's Council, competent institutions, market participants and the public.

Their content covers key technological, infrastructural, financial and statistical indicators, the state of competition, the exercise of end-user rights, the efficiency of radio-frequency spectrum and numbering management, the security and quality of electronic communications and postal

services, as well as an overview of supervisory and other procedures carried out by the Agency within its competences.

A specific segment consists of analyses and information prepared on an ad hoc basis, in response to specific requests from public authorities, international s or evolving market conditions. These analyses enable rapid assessments in situations requiring additional regulatory action, the introduction of new policies, adjustment of existing measures, or provision of information to the public on matters of particular importance.

In addition to obligations prescribed by the Law on Electronic Communications and the Postal Services Act, the Agency, with a view to ensuring transparency and good governance, shall prepare documents arising from obligations under specific legislation. These documents ensure transparency of financial operations, proper conduct of public procurement procedures, management of internal controls, protection of integrity, and compliance with public sector governance standards. They also represent an important mechanism for monitoring the al, financial and administrative functioning of the Agency, strengthening institutional accountability, and planning further improvements.

Through the implementation of these activities, the Agency ensures a reliable, consistently updated and analytically grounded database and indicators, which is essential for evidence-based regulatory policy and decision-making, as well as for enhancing transparency, market efficiency and the protection of interests of end-users and market participants.

3.4. COOPERATION WITH INSTITUTIONS IN MONTENEGRO AND INTERNATIONAL INSTITUTIONS

3.4.1. Cooperation with State Authorities and Institutions in Montenegro

In accordance with the Law on Electronic Communications and the Postal Services Act, the Agency will, in 2026, systematically enhance cooperation with competent authorities and institutions in Montenegro in order to ensure consistent application of legislation, more efficient infrastructure planning and development, and strengthened protection of end-users. The cooperation will include the Ministry of Economic Development in the implementation of laws and strategic documents; the authority responsible for competition protection through the provision of opinions and initiation of procedures in cases of distortion of competition; the authority responsible for consumer protection; as well as with the authorities responsible for spatial planning and construction, environmental protection (including protection against non-ionising radiation), audiovisual media services, personal data protection, information security, protection of critical information infrastructure, internal affairs, national security and defence, and state roads. When necessary, other competent authorities will be involved to ensure the comprehensive implementation of regulations within the Agency's competences.

A priority will be strengthening cooperation with the Ministry of Spatial Planning, Urbanism and State Property to ensure adequate treatment of electronic communications infrastructure and networks in planning and technical documentation. The Agency will insist on the mandatory inclusion of electronic communications infrastructure in urban-technical conditions and project documentation for the construction and reconstruction of residential and commercial buildings, transport infrastructure and other facilities suitable for network deployment. At the same time, in cooperation with competent authorities and local self-government units, efforts will be made to simplify and accelerate procedures for issuing permits for the construction of electronic communications networks, as well as to harmonise administrative practices across the country. These measures will be implemented through spatial plans and accompanying regulatory acts.

For the purpose of efficient radio-frequency spectrum management and implementation of the Radio Frequency Allocation and Assignment Plan, the Agency will, in addition to cooperation with the Ministry of Economic Development, continue coordination with authorities and institutions responsible for the safety of civil aviation and maritime transport, internal affairs, national security and defence, as well as with the regulator for audiovisual media services.

With a view to rational use of public administration resources, data exchange and improvement of the work in the electronic communications and postal services sectors, cooperation will be continued and further strengthened with institutions with which cooperation agreements have been concluded, including: the Agency for Protection of Competition, the Real Estate Administration, the Statistical Office, the Institute for Standardisation, the Institute of Hydrometeorology and Seismology, the Agency for Personal Data Protection and Free Access to Information, the Civil Aviation Agency, the Maritime Safety and Port Management Administration, the Environmental Protection Agency, the Agency for Audiovisual Media Services, the Energy and Regulated Utilities Agency, the Human Resources Administration, the Engineering Chamber of Montenegro, the Faculty of Electrical Engineering, and the Montenegrin Academy of Sciences and Arts (CANU). Cooperation will be expanded to other public authorities where necessary, to ensure efficiency and synergies in the use of resources.

Representatives of the Agency will continue to participate in bodies, teams and working groups established by decisions of the Government of Montenegro, the ministries and the Chamber of Economy, including the Coordination Body for Digital Transformation Administration, National Interinstitutional Operational Team for the Prevention and Suppression of Violent Extremism, Terrorism, Money Laundering and Terrorist Financing, AML/CFT interinstitutional working groups, the coordination bodies related to the Berlin Process, the Information Security Council, the MIXP Advisory Body, and the National Interinstitutional Resilience-Related Operations Team.

The Agency will actively cooperate with the Ministry of European Affairs in Montenegro's EU accession process, including participation in the Subcommittee on Innovation, Human Resources, Information Society and Social Policy, as well as in working groups related to the negotiation process under Chapter 3 (Right of Establishment and Freedom to Provide Services),

Chapter 10 (Information Society and Media), and Chapter 28 (Consumer and Health Protection).

In the field of joint planning, construction and protection of electronic communications infrastructure, the Agency will coordinate activities with the Ministry of Economic Development, the Ministry of Spatial Planning, Urbanism and State Property, the Ministry of Transport, the Transport Administration, the Engineering Chamber of Montenegro, and local self-government units, with the following specific objectives: preventing damage to infrastructure, promoting the shared use of existing infrastructure, improving planning and ensuring more transparent procedures, as well as facilitating the more efficient issuance of permits for the construction of networks and their components.

For the implementation of the Law on Payment Transactions, the Agency will cooperate with the Central Bank of Montenegro.

The Agency will also strengthen cooperation with the academic community in Montenegro, particularly with the University of Montenegro, in order to further develop MIXP, establish and enhance an IPv6 laboratory, and promote migration to IPv6 at the national level. Cooperation Agreement with the Montenegrin Academy of Sciences and Arts (CANU), concluded in July 2024, will be implemented, the cooperation with other universities will be established. This cooperation framework will contribute to knowledge transfer, capacity building and making the grounds for the accelerated digital transformation and stronger development of electronic communications and postal services.

3.4.2. Cooperation with International Institutions

Within its international activities, the Agency plans to participate in the work of key institutions in the field of electronic communications and postal services, including:

- Body of European Regulators for Electronic Communications (BEREC);
- Independent Regulators Group (IRG);
- European Regulators Group for Postal Services (ERGP);
- European Conference of Postal and Telecommunications Administrations (CEPT);
- International Telecommunication Union (ITU);
- Universal Postal Union (UPU);
- Radio Spectrum Policy Group (RSPG);
- Regional Cooperation Council (RCC);
- European Committee for Postal Regulation (CERP);
- Central European Free Trade Agreement (CEFTA);
- European Telecommunications Standards Institute (ETSI);
- European Mediterranean Regulators Group (EMERG);
- RIPE NCC.

Cooperation of the Agency will be implemented through the active participation of its representatives in the work of international and European bodies, working groups, forums, workshops and training programmes dealing with the development, regulation, security and harmonisation of electronic communications and postal services. This includes participation in expert groups within CEPT, ECC and RSPG, particularly in the areas of radiocommunications, numbering resources, electronic communications networks and services, and security, as well as activities related to preparations for the World Radiocommunication Conference 2027 (WRC-27). The Agency will also participate in the activities of ITU, BEREC, IRG, CERP, ERGP, EMERG, ENISA and ETSI, through plenary meetings, expert groups, seminars, workshops, trainings and project teams, which will contribute to exchange of knowledge and experience, strengthening of the capacities in the area of cyber security and harmonisation of national legislation with European and international standards.

In the field of radio-frequency spectrum management, control and monitoring, participation in CEPT/ECC (including WG FM/PT22) and RSPG processes will continue, focusing on measurement techniques, standardisation of procedures, interference statistics and regulatory implementation. Activities will include the preparation of common positions of European administrations for WRC-27 throughout the 2024–2027 study cycle, including the assumption of coordination responsibilities for specific agenda items. In parallel, regional cooperation with neighbouring administrations continues in the field of radio-frequency coordination and the monitoring of the implementation of bilateral and multilateral agreements, with particular emphasis on resolving harmful interference in the 700 MHz, 2.6 GHz and 3.6 GHz bands.

The cooperation will also cover other regulatory areas, including numbering and addressing, mapping of electronic communications infrastructure, infrastructure protection and sharing, universal service, market analysis, price regulation and cost models, network and service security, end-user protection, and postal services. For these purposes, targeted study visits to regulatory authorities with demonstrated progress in these areas will be organised (i.e., HAKOM, AKOS, RATEL etc.), and the acquired experience will be used to further planning and implementation of the activities. A visit to HAKOM is also planned for the exchange of experience regarding the development of baskets of electronic communications services (“service baskets”) used for retail price comparison in this area.

With a view to exchanging practical experience and gaining a comprehensive understanding of all regular and ad hoc tasks and procedures involved in the day-to-day work related to RF spectrum control and monitoring, during 2026 the Agency should arrange for staff members of the relevant department to undertake study visits to some of these authorities. In this regard, it would be useful during 2026 to organise study visits to the monitoring service of at least one EU country in which the same or very similar devices and software for RF spectrum control and monitoring are used. This means that the representatives of the Agency, together with colleagues from the monitoring service, should spend a certain number of days working directly with the control and measurement equipment and software, followed by an exchange of experience gained through the processing and analyses of the achieved control and measuring results.

In addition, specific visits would be organised to gain insight into achievements related to the close integration of RF spectrum monitoring and spectrum management, as well as into automated RF spectrum monitoring solutions implemented in certain countries where such systems are already operational.

The President of the Agency's Council participates in the work of BEREC Mini-Board, ensuring direct involvement in strategic discussions and decision-making processes in the field of electronic communications regulation at the European level. The participation contributes to timely exchange of information, provides insight into current EU regulatory trends and priorities, and also strengthens the Agency's institutional visibility and credibility within the European regulatory community. Participation in the BEREC Mini-Board also contributes to more effective transposition of European regulatory practices and guidelines into the national regulatory framework. In addition to the participation of the President of the Agency's Council in the work of the BEREC mini-board, representatives of the Agency actively participate in the work of thematic working groups of BEREC, in accordance with their respective areas of responsibility and professional expertise.

Through their engagement in these working groups, the Agency contributes to and follows the preparation of analyses, guidelines, and common positions at the European level, while at the same time acquiring valuable practical knowledge and experience that are used to improve the national regulatory framework and regulatory practice.

In the context of legal and regulatory alignment with the EU acquis, the Agency will continuously monitor the development and implementation of key European legislative and regulatory acts relevant to the field of electronic communications. Upon the full application of the Gigabit Infrastructure Act (GIA), the Agency will carry out targeted expert visits, consultations, and exchanges of experience with competent institutions and regulatory authorities in EU Member States, with the aim of ensuring a timely understanding of the regulatory, institutional, and operational requirements introduced by the Act.

These activities will enable the timely preparation of the national legislative and secondary regulatory framework, as well as the adaptation of the Agency's internal procedures and capacities for effective implementation of the Gigabit Infrastructure Act (GIA) in practice.

During 2026, the Agency will continue to actively monitor the development and implementation of the Digital Services Act (DSA), as well as participate in relevant international and regional activities related to its implementation. Particular attention will be given to the exchange of experiences and best practices with administrations and countries in which independent regulatory authorities have already been designated as Digital Services Coordinators (DSCs), with the aim of strengthening the Agency's institutional capacities and ensuring its full preparedness for potential participation in national coordination bodies and the assumption of additional competences in this area.

These activities will enable the timely assessment of the regulatory, organisational, and technical requirements introduced by the DSA, as well as the adaptation of the national institutional framework in line with international experience and European best practices.

Regional cooperation within the RCC framework will continue through the activities of thematic groups (roaming, broadband internet access, 5G, DESI), as well as through participation in the consultation and coordination group under the EU–Western Balkans Regulatory Dialogue, including the continued implementation of obligations arising from the Agreement on the Reduction of Roaming Charges in the WB6 and between the EU and the WB6.

With a view to further exchange of expert knowledge and presentation of the results, the Agency will ensure the participation of its representatives at the relevant congresses and conferences in the country and region, inter alia at: Telfor, Postel, Regulatory Conference – Ohrid, BIHTEL – Sarajevo, RIPE, NCC SEE, MWC Barcelona, etc.

In the segment of postal services is planned participation in the activities of expert bodies of the Universal Postal Union (UPU) and Central European Free Trade Agreement (CEFTA), international events, and study visits focused on quality regulation, cross-border delivery services, and the economic aspects of the sector, as well as participation in the annual Parcel + Post Expo exhibitions dedicated to achievements and innovations in the field of postal services.

Through the implementation of these international activities, timely harmonisation with European and international frameworks will be provided, alongside strengthening of technical and institutional capacities, improvement of the quality of regulatory instruments, and increased predictability of the market environment.

3.4.3. Organisation of International Events and Workshops

1. Organisation of the International Conference “Regulatory Activity in the Electronic Communications Sector”

In 2026, the Agency will continue to organise the traditional international conference of regulators entitled “Regulatory Activity in the Electronic Communications Sector”, primarily attended by representatives of regulatory authorities from Central and South-Eastern Europe, representatives of international institutions whose activities are strictly related to electronic communications, as well as representatives of competent ministries and operators. This international event is traditionally organised by the Agency in cooperation with the International Telecommunication Union (ITU).

2. Organisation of Workshops on the Use and Protection of Electronic Communications Infrastructure

The Agency has already organised workshops aimed at informing local administrations and public utility companies about the Law on the Use of Physical Infrastructure for Deployment of High-Speed Electronic Communications Networks (“Official Gazette of Montenegro”, No. 01/22), obligations under the Law on Electronic Communications, the Agency’s Geoportal, and obligations related to electronic communications infrastructure under the Law on Spatial Planning (“Official Gazette of Montenegro”, No. 19/25) and the Law on Construction (“Official Gazette of Montenegro”, No. 19/25). Taking into account the achieved results, the organisation of such workshops will continue in 2026. It is planned to involve all institutions that can contribute to faster development of electronic communications and protection of existing infrastructure. The topics will be expanded to include informing local self-government units about legal provisions concerning the use of assets of general interest and immovable property owned by the State and local authorities, based on rights of way for deployment of new electronic communications infrastructure.

3. Organisation of the NaN2 Subgroup Meeting

Within the framework of international cooperation and active participation in the work of the Numbering and Networks (NaN) Group under the Electronic Communications Committee (ECC) within CEPT, the Agency plans to host, in 2026, one of the meetings of the NaN2 subgroup, which deals with number portability, switching of operators, and regulatory aspects of network technologies.

This subgroup examines the experiences and regulatory practices of members in the implementation of the European Electronic Communications Code (EECC), thereby contributing to the alignment of national policies with European standards.

The meeting is planned to take place during one of the regular terms – March, May or October 2026 – and will last two days, in a hybrid format (physical and online participation). A total of 40 to 50 participants are expected, of which approximately 20 will attend in person.

4. Marking the 25th Anniversary of the Agency

In 2026, the Agency will mark 25 years of its operation through a series of activities aimed at promoting its role and importance in the development of the electronic communications and postal sectors in Montenegro. On this occasion, a ceremonial event will be organised with the participation of representatives of public authorities, regulatory authorities from the region and the EU, operators, the academic community and other relevant stakeholders. As part of the anniversary, a dedicated publication on the development of the regulatory framework and the market over the past 25 years will be prepared.

5. Organisation of a Round Table – Presentation of the PWS Feasibility Study

As part of the activities of the working group for the introduction of a Public Warning System (PWS) in Montenegro, the final phase of the project “Feasibility Study on Implementation of PWS in Montenegro” is planned.

Based on the draft Feasibility Study, Technical Report and Implementation Plan, a one-day workshop will be organised in Montenegro in January 2026. The objective of the workshop is to validate the Feasibility Study, with the participation of all relevant stakeholders involved in the implementation and use of PWS, thereby formally closing the project. This project is implemented in cooperation with the ITU.

6. Organisation of a Round Table on “Challenges in the Implementation of 5G Mobile Networks in Montenegro”

The round table will address the current state and level of deployment of 5G mobile networks in Montenegro, including an overview of technical characteristics and capabilities of 5G systems, types of services and their use cases.

The discussion will include experiences of other countries in the development and operation of 5G networks, potential areas of advanced application in the national context, as well as the impact of 5G technology on citizens, the economy and digital transformation. Particular attention will be paid to identifying challenges, risks and future development directions, as well as to communication with the public in order to strengthen trust and understanding of the benefits of this technology.

7. Organisation of a Round Table in Cooperation with CANU on “Challenges in the Regulation of Future 5G/6G Telecommunications Networks”

The round table will address key regulatory challenges related to the development and further advancement of 5G networks, as well as preparations for future 6G technologies, including issues of security and integrity of communications, privacy and data protection, and regulatory implications of emerging technological solutions.

The discussion will include the identification of potential limitations, barriers and risks in the development and regulation of 5G/6G networks, exchange of experiences and approaches to overcoming them, and consideration of possible development directions and regulatory frameworks for 6G technologies in Montenegro, with an emphasis on transparent and proactive communication with the public.

3.5. ENSURING MATERIAL-TECHNICAL CONDITIONS AND STRENGTHENING ADMINISTRATIVE CAPACITIES

During 2026, the Agency will continue activities aimed at strengthening its material and technical capacities through proper maintenance and technological development, as well as its human resources through continuous professional training of the Agency’s employees and the recruitment of new staff, with the objective of ensuring high-quality and efficient performance of the Agency’s statutory competences.

A. Development and Maintenance of Material-Technical Capacities

In 2026, the Agency will continue further development and enhancement of its material and technical capacities through regular maintenance, technological modernisation, and implementation of measures ensuring the security and stability of systems and facilities. Key priorities will include the improvement of information and communication infrastructure, digital transformation of business processes, strengthening of information security, energy efficiency, and physical and technical protection. In accordance with the Agency's facility protection plans approved by the Ministry of the Interior, protection measures will be implemented, encompassing technical and organisational improvements to ensure the security of facilities, equipment, and employees.

Pursuant to the Information System Development Plan and the Information Security Enhancement Plan, modernisation of the Agency's information system is planned in order to ensure more efficient implementation of business processes, management of registers and databases, electronic document management, monitoring of public procurement procedures, preparing reports, and development of applications for communication with users. To this end, the following activities are planned for 2026:

- replacement of obsolete communication hardware and end-user IT equipment with modern devices;
- introduction of additional systems for traffic and malicious content analysis, as well as protection mechanisms;
- enhancement of the DRS system and server room at GKMC to ensure full redundancy and increased information system security;
- technological upgrading of registers, databases, and applications, as well as integration of the information system to automate internal and external procedures;
- establishment of a shared database accessible to all professional units of the Agency;
- procurement of tools to enhance cybersecurity of the Agency's systems (SIEM, vulnerability scanners, etc.);
- updating and expanding policies, rulebooks, procedures, and guidelines in the field of information system management and information security.

The Agency will engage specialised technical and legal entities for the maintenance and development of existing information services and applications, including the electronic communications infrastructure database "Geoportal", the system for data collection from operators, the internet access speed measurement system, the document management system, the central database of ported numbers, coverage and mobile network signal quality benchmarking portals, the "Kalkulator cijena" ("Price Calculator") tool, the "Ne zovi me" ("Do Not Call Me") register, and other services. Further improvements are planned for the Operator Register, Numbering Register, Calculator, and systems for collection and processing of market data, as well as maintenance of the information system for operator switching and number portability (ISPO).

Development of the Radio Frequency (RF) Spectrum Monitoring and Control System of Montenegro will continue, in accordance with the Law, the System Development Study, and the Agency's planning documents. Within this framework, the following activities are planned:

- renewal of the framework agreement on telecommunication connectivity of monitoring and measurement stations;
- regular maintenance, calibration, and repair of measurement equipment and software;
- enhancement of remote systems in terms of green energy use and self-sustainability;
- preparation for the implementation of an RF sensor network in the Capital City area;
- standardisation of coordinates, elevations, and naming of fixed radio station locations to establish a unified register.

The Agency will continue maintenance and development of software for RF spectrum planning and management, as well as procurement procedures for support and adaptation of existing licenses. Development of a public web portal for the database of assigned radio frequencies is planned, along with upgrades to coverage map portals for mobile network signals, FM transmitters, and digital services.

During 2026, the Agency will prioritise investment activities aimed at improving infrastructure and the working environment, with particular emphasis on:

- enhancing spatial capacities and functionality of workspaces;
- modernisation and optimisation of the vehicle fleet;
- integration of renewable energy sources into operational processes;
- implementation of energy efficiency and decarbonisation measures to reduce total CO₂ emissions.

These activities form part of the Agency's continuous commitment to creating an efficient and functional working environment and are aimed at improving the quality of employees' work, ensuring sustainable and environmentally responsible operations, and reducing operational costs.

During 2026, the Agency will initiate procedures for standardisation of operations in accordance with ISO 9001 and ISO 27001 standards. Additionally, innovation, reorganisation, digitalisation, and automation of business processes and procedures are planned, including the introduction of advanced technical solutions aimed at increasing the level of digitalisation operations. Furthermore, the reporting system and performance analysis framework will be improved.

In its operations, the Agency also plans to utilise advanced modern business tools, including those based on artificial intelligence.

B. Strengthening Human Resources and Professional Development

In 2026, the Agency will continue to strengthen its human resources capacities and professional development of employees, with the aim of improving quality, efficiency, and professionalism in the performance of its competences. Particular focus will be placed on ensuring a sufficient number of competent and specialised staff, continuous professional development of employees, as well as strengthening interdepartmental cooperation and organisational awareness and culture.

Professional development of employees will be implemented through trainings, seminars, conferences, study visits, and online courses organised by domestic and international institutions and organisations. Training programs will cover topics in the fields of regulatory policies, management of scarce resources, implementation of ISO standards, information technologies and information security, business skills, accounting, auditing and financial management, artificial intelligence, as well as the use of modern digital tools. The Agency will ensure access to professional literature and relevant databases.

Within international cooperation, participation of the Agency's representatives in expert meetings and workshops organised by regulatory bodies is planned, with the aim of exchanging experiences and improving regulatory practice. Particular emphasis will be placed on training and specialised programs dedicated to the transposition of EU legislation into primary and secondary legislation in the field of electronic communications and postal services, as well as regulations governing user rights and protection. The plan also includes training programs for working with monitoring and measurement equipment and software, as well as further specialisation in areas related to regulation of universal services, electronic services, broadband infrastructure mapping, and the implementation of the Regulation on cross-border parcel delivery. In order to enhance efficiency and interdepartmental cooperation, the Agency will organise internal training workshops and activities aimed at strengthening teamwork and organisational culture and awareness. Further improvements in working conditions are planned through the provision of appropriate technical equipment, consideration of the provision of flexible working arrangements, and the introduction of supplementary health insurance.

By implementing these activities, the Agency will ensure stable and sustainable development of professional and administrative capacities, enhance the quality and efficiency in carrying out regulatory tasks, and ensure continuous alignment with European standards and best practices in the field of electronic communications and postal services.

4. OBJECTIVES AND PERFORMANCE INDICATORS

The Agency's objectives are:

- alignment of the regulatory framework with the EU acquis and ensuring its full implementation;

- ensuring conditions for the development of infrastructure and the implementation of new technologies in the fields of electronic communications and postal services;
- ensuring protection and promotion of competition in the markets of electronic communications and postal services;
- ensuring a high level of availability and quality of electronic communications and postal services, as well as effective protection of users' rights and interests in their relations with operators;
- continuous improvement of work quality, achieving high standards of professionalism and ethics;
- strengthening cooperation with national and international institutions, and maintaining a constructive, visible, and active role in key international organisations in the fields of electronic communications and postal services.

In relation to the above objectives, the following performance indicators and activities to be implemented by the Agency during 2026 are highlighted, as well as medium-term plans and policies to be carried out in the period 2026-2028-2030, with the aim of achieving these objectives.

- Alignment of the regulatory framework with the EU acquis and ensuring its full implementation

Through its representatives, the Agency will participate in the work of interinstitutional working groups for the preparation of draft laws and other legislative solutions, as well as adopt new secondary legislation and amend existing regulations in accordance with its competences, as outlined in the 2026 Work Plan, Chapter 2.1 – Normative Activities.

Performance indicators for regulations adopted by the Agency will be their adoption within the prescribed deadlines. For regulations adopted by the Government of Montenegro and the competent ministry, the performance indicator will be the Agency's preparation of expert grounds and their submission to the competent institution for further procedure. Medium-term plans and policies will be aligned with those adopted by the Government of Montenegro, competent ministries, and international bodies such as BEREC, IRG, RSPG, and ITU in the field of electronic communications, and UPU, ERGP, and others in the field of postal services.

- Ensuring conditions for infrastructure development and implementation of new technologies in electronic communications and postal services

In 2025, secondary legislation was adopted based on the new Law on Electronic Communications, further elaborating the provision of universal service. By the end of 2025, universal service providers will be designated and will begin providing these services as of 25 January 2026. During 2026, the Agency will monitor development and implementation of universal service by designated providers and promote its use, with particular attention to the implementation of technologies enabling more efficient and cost-effective provision of connections based on universal service requests.

Efficient management of the radio-frequency (RF) spectrum is of particular importance for achieving this objective. Procedures for granting rights of use of radio frequencies for various radiocommunication services will be continuously implemented in accordance with the Frequency Allocation Plan and relevant frequency assignment plans. The Government of Montenegro adopted the RF Spectrum Allocation Plan in 2025 upon the Agency's proposal, and its implementation has commenced. The Agency will participate in international working groups and bodies to ensure adequate preparation for participation in the World Radiocommunication Conference scheduled for 2027. In parallel, regional cooperation will continue in coordination of radio frequencies and monitoring the implementation of agreements with neighboring administrations, with particular emphasis on resolving harmful interference in the 700 MHz, 2.6 GHz, and 3.6 GHz bands. Participation in interinstitutional working groups will continue in order to ensure an adequate legal basis for introduction of digital radio. Based on requests submitted by operators in accordance with Article 226 of the Law, the Agency will conduct procedures for extending the validity of authorisations for the use of radio frequencies in the 700 MHz and 3.6 GHz bands for a period of 20 years, which is considered appropriate for return on investment in network development.

In accordance with the Law on Electronic Communications, the Law on Spatial Planning, and the Law on Construction, the Agency is obliged, upon request of entities responsible for drafting and adopting planning documents, to provide data on existing and planned electronic communications networks, infrastructure, and associated facilities within the scope of such planning documents; to issue opinions on draft planning documents; to provide consent to proposed planning documents; to issue approvals for main designs in construction permit procedures; and to define technical conditions in accordance with special regulations (technical requirements for state and local public-interest facilities).

Performance indicators for achieving this objective include the timely completion of administrative procedures related to the issuance and extension of authorisations for the use of radio frequencies, improvement of the regulatory framework through adoption of new secondary legislation and amendments to existing secondary legislation. They also include continued provision of universal service in the electronic communications sector, and improvement of regulatory conditions for further market development, greater availability and improved quality of services, and implementation and availability of new technologies. Additionally, regular reporting to the Agency's Council through reports and information specified in Chapter 2.3 of this Plan will serve as an indicator. Given the complexity of resolving harmful interference, medium-term plans and policies will focus on successfully addressing these issues through cooperation with neighboring administrations.

- Ensuring protection and promotion of competition in the electronic communications and postal services markets

During 2026, based on the Law on Electronic Communications and the Decision on Relevant Markets, the Agency will conduct procedures for the analysis of relevant markets and monitor

the implementation of regulatory obligations imposed on operators with significant market power (SMP) in those markets, following previously conducted market analyses.

In accordance with the timeline defined by the Methodology for Accounting Separation and Cost Accounting, the Agency will continue in 2026 to monitor the process of regulatory reporting based on Current Cost Accounting (CCA) and the Long-Run Incremental Cost (LRIC) standard for operators with significant market power.

The Agency will supervise the application of wholesale service prices determined based on *bottom-up* LRIC cost models for fixed and mobile electronic communications networks.

In 2026, in cooperation with a selected consultancy firm, the Agency will calculate the *Weighted Average Cost of Capital (WACC)* for 2025.

During 2026, monitoring of the implementation of the 2020 Decision by operators will continue, particularly regarding the reduction of maximum average wholesale roaming data prices as of 1 January 2026, as well as the proper application of regulations for the implementation of that Decision. In parallel, in cooperation with the competent ministry, efforts will be made to align national legislation with the regulatory framework required for the implementation of RLAH (Roam Like at Home) between the EU and the Western Balkans region.

Performance indicators for achieving this objective include completed market analysis procedures and the determination of appropriate regulatory measures, monitoring of their implementation, supervision of regulatory reporting processes and wholesale pricing based on relevant cost models, adoption of the decision on the calculation of WACC for 2025, and regular reporting to the Agency's Council through reports and information specified in Chapter 2.3 of this Plan.

With regard to roaming services, a key performance indicator will be the completion of the analysis of alignment of the national legislative framework with the EU acquis and the identification of provisions requiring further harmonisation, as well as the preparation of proposals for amendments to the Law on Electronic Communications and relevant secondary legislation to ensure full compliance with EU roaming regulations. Medium-term plans and policies address the continuous implementation of market analyses, imposition and monitoring of regulatory measures, and the conclusion of agreements on Montenegro's accession to the EU's single roaming market (RLAH – Roam Like at Home).

- Ensuring a high level of availability and quality of electronic communications and postal services and effective protection of users' rights and interests in their relations with operators

The Agency continuously monitors the markets it regulates, particularly in terms of service availability, quality, and user satisfaction, including the protection of users' rights and interests in accordance with the law and contracts with service providers. These activities are carried out

by the Agency's staff through regular operations or by inspectors, in line with their legally prescribed competences.

Key performance indicators for achieving this objective include: efficient handling of user complaints, continuous communication with and education of users regarding their rights and interests, publication of comparative quality parameters of electronic communications services on the Agency's website and provision of recommendations to operators for service quality improvement, enhancement of the internet access speed measurement system to monitor availability and service quality, and promotion of its use among end-users.

Additional indicators include monitoring compliance with the principle of net neutrality, proposing measures for its improvement, and taking appropriate action in cases of identified discrimination or traffic management practices. These also include the increase in the number of users of the "Price Calculator" application and its improvement in order to enable comparisons not only based on price but also on service quality (where minimum quality parameters are defined or required to be published by operators). Surveys will be conducted on user satisfaction with the prices and quality of electronic communications services, as well as on user satisfaction with the provision and quality of postal services in Montenegro. Medium-term plans and policies regarding this objective focus on continuous user education and, consequently, increasing user satisfaction with the quality and availability of services provided by electronic communications and postal operators.

- Continuous improvement of work quality, achieving high standards of professionalism and ethics

In 2026, the Agency will continue to develop and enhance its material and technical capacities through regular maintenance, technological modernisation, and implementation of measures ensuring the security and stability of systems and facilities. Key priorities will include improving ICT infrastructure, digital transformation of business processes, strengthening information security, energy efficiency, and physical and technical protection.

The Agency will also continue strengthening human resources and professional development, with a focus on ensuring a sufficient number of competent and specialised staff, continuous professional training, and strengthening interdepartmental cooperation and organisational culture.

Performance indicators for the achievement of this objective include the level of satisfaction of operators regarding the development and implementation of regulation and the creation of favorable, stable, and predictable business conditions, as well as public perception of the Agency's efficiency, expertise, and professionalism in handling various matters and requests within the sectors it regulates. Medium-term plans and policies address a continuous professional development of the staff through participation in national and international events, meetings of working groups, and training programs.

- Strengthening cooperation with national and international institutions, while maintaining a constructive, visible, and active role in key international organisations in the fields of electronic communications and postal services.

During 2026, cooperation with national and international institutions will continue, in accordance with the Agency's competences and status within these bodies. At the national level, particular attention will be devoted to active participation in working groups for negotiations with the European Commission, contributing to Montenegro's objective of becoming a full EU Member State in the coming years.

Performance indicators for this objective include continued organisation of the traditional ITU–Ekip Regional Regulatory Forum, ongoing participation in the work of bodies such as BEREC, ITU, CEPT, RSPG, EMERG, UPU, ERGP, RCC, and others.

Furthermore, in 2026, a meeting of the Numbering and Networks (NaN) Group within the Electronic Communications Committee (ECC) of CEPT will be organised, addressing issues related to number portability, operator switching, and regulatory aspects of network technologies.

Given that the President of the Agency's Council has been elected as a member of the BEREC and IRG Mini Board for 2026, this will contribute to a more active role of the Agency in the work of these bodies and further strengthen its position in the period beyond 2026.

5. IMPLEMENTATION OF THE WORK PLAN

In order to implement more efficient Work Plan, the Agency for Electronic Communications and Postal Services will, in accordance with Article 9 of the Statute of the Agency, prepare Operational Plan for the implementation of the 2026 Work Plan of the Agency. The Operational Plan will specify the persons responsible for carrying out the tasks, the deadlines for the completion of individual tasks set out in this Work Plan, and the managers responsible for the respective organisational units.

The funds necessary for the implementation of the 2026 Work Plan of the Agency are provided for in the 2026 Financial Plan of the Agency.

PRESIDENT OF THE COUNCIL
Milan B. Radulović, PhD EE