



# **NATIONAL AUTHORITY FOR MARKETS AND COMPETITION: ACTION PLAN FOR 2015**

**January 2015**

### ***From Strategic Plan to Action Plan***

Spain's National Commission for Markets and Competition (hereinafter "CNMC") drafted this Action Plan based on contributions from the Authority's Board, Directorates and Departments. It was approved by decision of the Board in December 2014 and will be valid for one year.

By means of **148 specific actions**, this Action Plan develops the 16 Lines of Action contained in the CNMC's Strategic Plan, approved on 7 May 2014.

All these specific actions are aligned with the **Mission, Vision and Values** of the CNMC, the three basic underpinnings of the Strategic Plan:

#### **Mission**

*The CNMC advocates and defends the proper functioning of all markets in the interest of citizens and businesses.*

#### **Vision**

*The CNMC, a model of reference in the areas of efficient economic regulation and competition: more efficient markets for greater wellbeing.*

#### **Values**

*Independence, transparency, maximum rigour, maximum effectiveness, predictability, defence of the general interest, synergy and legal certainty.*

#### **The three main objectives established in the Strategic Plan**

**Objective 1:** *The CNMC will make use of its toolbox in regulated sectors with maximum rigour so as to obtain the better results possible.*

**Objective 2:** *The CNMC will act transparently and independently, ensuring the predictability of its actions, allowing its activities to be guided exclusively by the general interest, in particular, the improved functioning of markets.*

**Objective 3:** *The CNMC will take advantage of the synergies deriving from its integrated structure, addressing market problems with global solutions that ensure the greatest possible legal certainty.*

## **Contents**

- 1. The 2015 Action Plan**
- 2. The Action Plan Drafting Process**
- 3. General Overview of the Action Plan**
- 4. Action for 2015**
- 5. Strategic actions (table)**

(A)	Arbitration
(T)	Transversal
(AV)	Audiovisual
(C)	Competition
(IC)	Internal Control
(COM)	Communication
(E)	Energy
(I)	Institutional
(P)	Postal
(PR)	Promotion
(SB)	Secretary to the Board
(GS)	General Secretariat
(TC)	Telecommunications
(TR)	Transport

## **1. The 2015 Action Plan.**

Now that the CNMC's Strategic Plan has been approved, which establishes its Mission, Vision, Objectives and Strategic Lines of Action, it is essential to specify the particular **actions** required to attain those objectives, in a **specific, transparent and measurable** way. *Law 3/2013 of 4 June, creating the CNMC*, states that the CNMC Board will approve annual or multi-annual action plans defining its objectives and priorities.

This first Action Plan of the CNMC, approved on 17 December 2014, sets out **148 specific lines of action** that the CNMC will carry out in 2015.

The CNMC has decided that this initial Action Plan be for one year, for two reasons: In order to diligently fulfil the requirements of transparency and rigour that the Spanish society demands and that the CNMC wishes to impose on itself, on the one side, and in order to ensure that the learning and improvement accompanying the institution's consolidation process is transferred to the next planning period as soon as possible, on the other side.

In this regard, throughout 2015 the CNMC will evaluate its performance against the Action Plan and take measures as appropriate to facilitate its achievement and to improve future planning.

The Plan must allow:

- action priorities to be set rigorously for CNMC's Directorates and Departments;
- priorities to be visualised transparently, so that society can be aware of them and assess them;
- retrospective evaluation, to verify whether or not these priorities have been attained, in other words, whether CNMC resources and results are achieving the objectives set out in the Action Plan;
- the governing bodies of the CNMC to monitor progress against the objectives set in the Strategic Plan and developed in the Action Plan, proposing any corrective measures that might be necessary.

In short, the fact that this Plan specifies the actions that the CNMC will undertake in 2015 increases the Authority's transparency, rigour and predictability. It also strengthens the institution's accountability to Parliament.

The CNMC publicly commits its best efforts to achieve the objectives of this Action Plan. A doubly ambitious Plan, both for the number of actions to be undertaken and for their nature and the challenge they represent.

## **2. The Action Plan Drafting Process.**

- Following approval of the Strategic Plan in May 2014, the CNMC accelerated the drafting of its Action Plan, as established by *Law 3/2013 of 4 June, creating the CNMC*.
- The Action Plan is a single and overall document which describes the specific actions that the CNMC will carry out in 2015 in order to develop the strategic lines of action set in its Strategic Plan.
- The objectives and strategic lines of action of the Strategic Plan determine the configuration and development of the Action Plan.
  - The actions derive from the functions assigned by law to the CNMC, and yet must be innovative.
  - The actions are based on contributions from the various Directorates and horizontal Departments of the CNMC to the Action Plan.
  - The Action Plan also contains the proposals made by the CNMC Board.
- In drawing up the Action Plan, the plans of Competition and Regulatory Authorities in other countries were reviewed in order to identify the best practices and incorporate them into the CNMC Plan.
- The Action Plan is built on the lessons learned in the first year of existence of the CNMC, adapting the planning to the strengths, weaknesses, opportunities and threats that have been detected.

### 3. *General overview of the Action Plan*

- The Action Plan constitutes the transparent and accountable development of CNMC's Strategic Lines of Action, by means of specific activities.
- It consists of sectoral and transversal actions covering all CNMC's Objectives and Strategic Lines of Action.
- In its first edition the Action Plan covers just one year and contains **148 specific actions** which will contribute to:



and in so doing, effectively fulfil the CNMC's fundamental Missions: ***to advocate and defend the proper functioning of all markets in the interest of citizens and businesses.***

***The CNMC is firmly committed to the implementation of the 148 actions set out hereunder during 2015.***

#### **4. Action for 2015.**

<p><b><i>Strategic Action 1. An integrated approach to enhance competition and efficient economic regulation</i></b></p>
--

- 1.1. Develop an internal strategy that ensures the cohesion of the organisation, establishing permanent cooperation and information channels among units and creating a common culture based on the principle of independence and the objective of ensuring the efficient operation of all markets in the Spanish economy.<sup>(T)</sup>
- 1.2. Establish internal mechanisms to ensure that the CNMC's investigations and decisions incorporate the necessary economic and empirical analysis.<sup>(T)</sup>
- 1.3. Encourage ongoing review of the CNMC's decisions with a view to ensuring the application of uniform legal criteria that favour economic efficiency and social wellbeing.<sup>(T)</sup>
- 1.4. Develop the methodology for calculating tolls and access fees for gas infrastructure.<sup>(E)</sup>
- 1.5. Implement a cost disclosure system for the regulated activities of electricity transmission; electricity system operator; transport, regasification and underground storage of natural gas; and gas system technical manager.<sup>(E)</sup>
- 1.6. Implement a Cost Disclosure System for the regulated activity of natural gas distribution.<sup>(E)</sup>
- 1.7. Develop a draft methodology for the remuneration of the Electricity Market Operator and System Operator.<sup>(E)</sup>
- 1.8. Calculate the profit margin to be applied to the referential sales activity for supplying power at the special rate for small consumers (PVPC).<sup>(E)</sup>
- 1.9. Work to strengthen consumer knowledge and information (customer empowerment), particularly as regards billing.<sup>(E)</sup>
- 1.10. Study and report on the necessary draft regulation for the creation of an organised gas wholesale market (gas hub).<sup>(E)</sup>
- 1.11. Draft a Circular with the methodology relating to the provision of balancing services, so that grid users balance their incoming and outgoing flows on the gas grid.<sup>(E)</sup>
- 1.12. Draft the Circular for applying double counting and the Instructions for Bio-fuel, and other renewable fuel used for transport, Certification System (SICBIOS).<sup>(E)</sup>



- 1.13. Implement the registry of participants in the energy wholesale markets and monitor compliance with their obligation to register (Article 9 of REMIT). <sup>(E)</sup>
- 1.14. Carry out operational audits of settlements in the energy sector and verify application of CNMC's budgetary credits devoted to the costs of the electricity sector. <sup>(E)</sup>
- 1.15. Define and publish principles for interpreting regulations applicable to audiovisual communication services, both television and radio. <sup>(AV)</sup>
- 1.16. Encourage the integration of persons with disabilities in the audiovisual sector. Assess compliance of operators' obligations in this respect. <sup>(AV)</sup>
- 1.17. Strengthen the Self-Regulation Code for television content as it relates to children, by renewing criteria for content rating. <sup>(AV)</sup>
- 1.18. Give priority to the following areas concerning the protection of children: 1- conduct relating to erroneous programme rating, and 2- incorporation of theme channels. <sup>(AV)</sup>
- 1.19. Strengthen advertising control, by promoting co-regulation and overseeing compliance of content with laws, regulations and self-regulation codes. <sup>(AV)</sup>
- 1.20. Give priority to monitoring and sanctioning unlawful advertising concerning, in particular, time limits and obligations to separate content and advertising. <sup>(AV)</sup>
- 1.21. Implement a protocol for monitoring and controlling the public service duty of RTVE (the state-owned broadcaster). <sup>(AV)</sup>
- 1.22. Finalise the third review of relevant markets in telecommunications (markets 4-5, 2 and 15). <sup>(TC)</sup>
- 1.23. Verify the five regulated telecommunications operators' cost accounting and determine their cost of capital. <sup>(TC)</sup>
- 1.24. Take a decision on the net cost of the universal service provided by regulated operators and decide on the operators obliged to contribute to the cost sharing mechanism. <sup>(TC)</sup>
- 1.25. Apply the new methodology for ex ante control of telecommunications wholesale offerings approved in 2013 and implemented in 2014. <sup>(TC)</sup>
- 1.26. Revise the Circulars on electronic communications, bearing in mind the new regulations and case law. <sup>(TC)</sup>
- 1.27. Draft a new procedure for suspension of interconnection applicable to full service Mobile Virtual Network Operators (MVNOs). <sup>(TC)</sup>
- 1.28. Determine the new parameters for suspending interconnection. <sup>(TC)</sup>

- 1.29. Update the mobile network cost model. <sup>(TC)</sup>
- 1.30. Monitor actions of public bodies as operators of electronic communications. <sup>(TC)</sup>
- 1.31. Audit AENA's (the airport manager in Spain) cost accounting model and analyse methodologies for cost forecasting. <sup>(TR)</sup>
- 1.32. Give special attention to the process of liberalisation of rail passenger transport, advocating for transparent and timely disclosure of the liberalisation timetable and monitoring the whole process with a view to ensuring effective competition. <sup>(TR)</sup>
- 1.33. Analyse the methodology for estimating the Universal Postal Service net cost. <sup>(P)</sup>
- 1.34. Audit the Universal Postal Service operator cost accounting model and results. <sup>(P)</sup>
- 1.35. Verify the calculation of the Universal Postal Service net cost and determine the unfair financial charge corresponding to years 2011, 2012 and 2013. <sup>(P)</sup>
- 1.36. Draft the CNMC's Arbitration Regulation including procedural rules, identification of cases suitable for fast-track procedure, designation of arbitrators and determination of fees. <sup>(A)</sup>

***Strategic Action 2. Development of internal communication and rapid decision mechanisms in the CNMC***

2.1. Develop the CNMC's Internal Regulation in order to establish each Deputy Directorate's specific functions. <sup>(1)</sup>

2.2. Establish a mechanism to ensure timely and effective collaboration among Directorates when necessary, especially in relation to the competition advocacy function as established in *Royal Decree 657/2013 of 30 August approving the Organic Status of the CNMC*. <sup>(1)</sup>

2.3. Clarify, specify and publish the criteria to bring a matter before the Plenary Session of the Board. <sup>(1)</sup>

2.4. Establish commitments, in terms of deadlines, in relation to the work of the Plenary and the Chambers: <sup>(SB)</sup>

- Make all documentation available to the members of the Board sufficiently in advance of the Sessions.
- Convey the decisions of the Board to the Directorates and Departments in 24 hours.
- Notify all matters approved by the Board within three business days maximum.
- Publish all resolutions adopted by the Board whose publication is mandatory within seven business days maximum.

***Strategic Action 3. Strengthened prosecution of the practices most harmful to competition and improved procedures for detection and prosecution***

- 3.1. Promote the use of instruments for detecting prohibited practices (screening, training on documentary resources, subscription to sector newsletters and magazines). <sup>(C)</sup>
- 3.2. Reinforce the assessment of public procurement procedures in order to detect any possible anticompetitive conduct. <sup>(C)</sup>
- 3.3. Strengthen surveillance of the sectors of the new economy, hospital, medicine and parapharmaceutical products, cement, construction and the sectors subject to supervision by the CNMC. <sup>(C)</sup>
- 3.4. Draft an explanatory note on dawn raids. <sup>(C)</sup>
- 3.5. Draft a Guide on confidentiality. <sup>(C)</sup>
- 3.6. Review and improve accusation documents and improve access to file in the resolution phase before the Board. <sup>(C)</sup>
- 3.7. Make improvements to IT tools used in competition investigations. <sup>(C)</sup>
- 3.8. Create a mailbox for citizen cooperation in the fight against anticompetitive practices. <sup>(C)</sup>
- 3.9. Disseminate the Leniency Notice. <sup>(C)</sup>
- 3.10. Strengthen the investigation, execution and sanction of actions in the energy wholesale market. <sup>(E)</sup>
- 3.11. Draft a Guide for the gradation of sanctions and the imposition of coercive fines in the area of telecommunications. <sup>(TC)</sup>
- 3.12. Draft a protocol for detection, warning and initiation of action in cases in the audiovisual services sector such that the CNMC plays a proactive role. <sup>(AV)</sup>
- 3.13. Review, and if necessary improve, internal mechanisms and protocols designed to safeguard the confidentiality of information. <sup>(SB)</sup>
- 3.14. Strengthen surveillance of implementation of Resolutions. <sup>(T)</sup>
- 3.15. Develop a methodology for evaluating the impact of competition policy and use it to guide the institution's strategy. <sup>(PR)</sup>
- 3.16. Gradually implement the use of information technology in the handling of files, in particular encouraging electronic notification and the use of the website. <sup>(T)</sup>

***Strategic Action 4. Promotion of corporate social responsibility, emphasis on merit and capabilities in the selection of personnel, better training and creation of multidisciplinary teams***

- 4.1. Draft a Corporate Social Responsibility Programme for the CNMC.<sup>(COM)</sup>
- 4.2. Draft a Social Action Plan for the CNMC.<sup>(GS)</sup>
- 4.3. Draft a Personnel Plan, with particular stress on the search for mechanisms to ensure appropriate professional careers for staff, regardless of whether they are employees or civil servants.<sup>(GS)</sup>
- 4.4. Draft a Training Plan enabling the detection of needs and keeping staff up-to-date.<sup>(GS)</sup>
- 4.5. Implement a scholarship programme in the CNMC for training in competition policy and regulation.<sup>(I)</sup>
- 4.6. Encourage teamwork with people belonging to different Directorates and Departments for, inter alia: (i) drafting cost accounting methodologies, (ii) developing methodologies for calculating tolls and access fees to gas infrastructure, (iii) calculating profit margins to be applied to the reference commercial activity for supplying power at reduced rates to small consumers (PVPC), (iv) drafting proposals for the creation of an organised gas wholesale market, (v) finalising the third revision of telecommunications relevant markets, (vi) analysing the methodology for estimating the Universal Postal Service net cost, (vii) assessing competition advocacy initiatives which have particular effects on the sectors supervised by the CNMC, (viii) assessing initiatives concerning audiovisual content.<sup>(T)</sup>
- 4.7. Organise in-house seminars and discussions among CNMC Directorates/Departments to allow interaction and flow of knowledge.<sup>(T)</sup>
- 4.8. Increase actions designed to promote teamwork in each Directorate/Department.<sup>(T)</sup>
- 4.9. Promote training among Directorates/Departments in the fields of competition law, competition advocacy, regulation (energy, transport, postal, telecommunications and audiovisual sectors), and case-handling procedures.<sup>(T)</sup>
- 4.10. Organise regular seminars on industrial and competition economics, and economic regulation.<sup>(PR)</sup>

- 4.11. Set up in intranet a system for providing information on events and meetings of relevance to the CNMC, both national and international, to all personnel and sufficiently in advance.<sup>(COM)</sup>

***Strategic Action 5. Maximum use of tangible and intangible resources***

- 5.1. Draft an Integrated Plan for Statistics and Documentary Resources Management.<sup>(PR)</sup>
- 5.2. Rationalise access to external databases.<sup>(T)</sup>
- 5.3. Design an internal communication policy for the international area, in order to disseminate CNMC's activities in this field and facilitate awareness of international best practices.<sup>(COM)</sup>
- 5.4. Assess CNMC's procurement and payments procedures in order to verify their compliance with the law and with the principles of efficient management. Make recommendations for improvement where necessary.<sup>(GS)</sup>
- 5.5. Plan and develop a centralised procurement system so to rationalise costs and avoid duplication, with the aim to optimise resource management.<sup>(GS)</sup>
- 5.6. Assess the efficiency of in-house providing.<sup>(T)</sup>
- 5.7. Draft a Plan to rationalise Data Processing Centres and IT Infrastructure Hosting, as well as e-mail, storage and printing systems, and to unify communications.<sup>(GS)</sup>

***Strategic Action 6. Publication of a Plan for studies and reports on priority sectors. Participation of stakeholders and academia***

- 6.1. Draft and publish a methodology for conducting studies. <sup>(PR)</sup>
- 6.2. Plan studies, focusing on the following priority sectors: motor vehicle tests, airports, fuel wholesale distribution, transparency in telecommunications offerings, inspections of gas installations, urban water supply and sanitation, distribution of pharmaceutical products, and the sharing economy. In the medium term: e-commerce, the banking sector, the educational system and the healthcare system. <sup>(PR)</sup>
- 6.3. Draft reports on sectors subject to supervision and regulation on the following matters: (i) procedures for switching provider of telecommunication services, (ii) railway charges and additional-and-complementary services tariffs regulatory frameworks, (iii) rail passenger transport liberalisation process, incorporating regulatory recommendations to boost competition, (iv) transport intermodality and (v) trends of the audiovisual sector in the emerging market. <sup>(T)</sup>
- 6.4. Enhance agreements with universities and research centres in matters of interest to the CNMC and, in particular, to encourage collaboration on studies and reports. <sup>(I) (PR)</sup>

***Strategic Action 7. Annual review of the markets subject to supervision or regulation, to assess the effectiveness of supervision mechanisms and make recommendations for improvement.***

- 7.1. Review the indicators for the monitoring of the markets under regulation or supervision. <sup>(T)</sup>
- 7.2. Produce annual reports on sectors subject to supervision and regulation as established by the legal framework, with a specific section to assess competition and Spain's situation compared with that in other countries, and making recommendations to enhance competition. Working groups will be set up, with the participation of different Directorates and Departments. <sup>(T)</sup>
- 7.3. Monitor the impact of CNMC's resolutions on competition matters, proposing measures and making recommendations. <sup>(T)</sup>
- 7.4. Drive the publication of a new Plan for the Provision of Universal Postal Service. <sup>(P)</sup>
- 7.5. Analyse the use of different means of postage by market operators, given the legislation in force and recent case law. <sup>(P)</sup>
- 7.6. Study the access conditions to the public postal network by alternative postal operators. <sup>(P)</sup>
- 7.7. Draft the relevant methodologies for informing on airport regulation, as part of the preparatory work for the first "DORA" (Airport Regulation Document). Submit for public consultation. <sup>(TR)</sup>
- 7.8. Conduct a public consultation on externalities of passenger transport activity in commercial results of airports. <sup>(TR)</sup>



***Strategic Action 8. Intensification of the dialogue with government bodies in order to advocate the principles of efficient economic regulation and to prevent market distortions***

- 8.1. Establish priority areas for Reports on draft legislation/regulations and Proposals for amendments of existing legislation/regulations. <sup>(PR)</sup>
- 8.2. Draft reports and proposals on public procurement, especially on public sector contracting. <sup>(PR)</sup>
- 8.3. Promote contact with contracting authorities with a view to raising their awareness about anticompetitive practices among bidders. <sup>(T)</sup>
- 8.4. Promote mechanisms for responding quickly and diligently to queries from Parliament. <sup>(I)</sup>
- 8.5. Draft a Guide to assess the effectiveness of state aid. <sup>(PR)</sup>
- 8.6. Analyse the implications of SGEI (Services of General Economic Interest) and PSO (Public Service Obligations) for effective competition, and how they relate to legislation on state aid. <sup>(PR)</sup>
- 8.7. By means of report participate in the energy sector planning process, particularly as regards administrative authorisations for energy facilities and the decisions whether to include them in the remuneration system. <sup>(E)</sup>
- 8.8. Propose a system for remunerating primary gas pipelines for serving markets in their zone of influence. <sup>(E)</sup>

***Strategic Action 9. Strengthened cooperation with other public bodies so that CNMC's actions have an effective impact on markets***

- 9.1. Intensify coordination with the State Legal Service in cases before the *Audiencia Nacional* and the Supreme Court, with a view to achieving better results in Court.<sup>(SB)</sup>
- 9.3. Make and maintain specific agreements with other public bodies to enhance access of the CNMC to information relevant to its functions.<sup>(T)</sup>
- 9.3. Organise seminars on competition law enforcement and economic regulation.<sup>(I)</sup>
- 9.4. Promote the introduction of a seminar on competition policy and economic regulation within the Judicial School.<sup>(I)</sup>
- 9.5. Collaborate and cooperate with other sector regulators.<sup>(I)</sup>
- 9.6. Collaborate and cooperate with regulators of the Regions (*Comunidades Autónomas*).<sup>(I)</sup>

***Strategic Action 10. Strengthened CNMC's legal standing***

- 10.1. Review and possibly reinforce communication with civil society so to raise awareness of the CNMC's role and tools, and seek collaboration with the CNMC. <sup>(I)</sup>
- 10.2. Draft a Guide on Market Unity. <sup>(SB)</sup>
- 10.3. Reinforce CNMC's actions as regards enforcement of the *Law on the Guarantee of Market Unity*. <sup>(SB)</sup>
- 10.4. Establish mechanisms to strengthen monitoring and assessment of economic laws and regulations. <sup>(PR)</sup>
- 10.5. Develop IT screening tools to analyse legislation and detect any possible restrictions to competition well in advance. <sup>(T)</sup>

***Strategic Action 11. Contributing to the continuous improvement of the international regulatory and competitive environment by participating in various EU and other international bodies and forums***

- 11.1. Develop a formal structure for the international area of the CNMC. <sup>(1)</sup>
- 11.2. Design a framework policy for disseminating the CNMC's activity internationally, so that it is known globally and transparently. <sup>(1)</sup>
- 11.3. Promote participation and leadership in the governing bodies of international institutions, forums and groups dealing with competition and regulation matters, including those of EU scope. <sup>(1)</sup>
- 11.4. Encourage CNMC's experts to participate actively and show leadership in working groups and task forces in EU and international bodies. <sup>(1)</sup>
- 11.5. Promote bilateral collaboration with institutions, regulatory bodies and competition authorities of the EU. <sup>(1)</sup>
- 11.6. Promote cooperation at regional level (MIBEL, Iberian Electricity Market) in electricity and derivatives markets. <sup>(E)</sup>

***Strategic Action 12. Development and improvement of the Network of Competition Authorities in collaboration with the Regions (Comunidades Autónomas)***

- 12.1. Sign collaboration agreements with those Regions with no functioning competition authority, in order to exchange relevant information so to enhance effectiveness of the Spanish competition system. <sup>(C)</sup>
- 12.2. Encourage coordination among authorities with a view to enforce the Competition Law uniformly. Follow up cases investigated by the regional authorities and issue statements and observations as appropriate. <sup>(C)</sup>
- 12.3. Draft new guides to improve the functioning of case allocation mechanisms among authorities, in particular those concerning case reallocation, allocation of complaints received by the CNMC, and procedures within the Advisory Board for Conflict Resolution (*Junta Consultiva*). <sup>(C)</sup>
- 12.4. Review and update documents concerning cooperation in relation to professional associations, funeral services and settlements (*terminación convencional*). <sup>(C)</sup>
- 12.5. Contribute to the training of personnel of the regional competition authorities. <sup>(C) and (PR)</sup>
- 12.6. Promote the creation of a Working Group for the Boards of Competition Authorities. <sup>(I)</sup>

***Strategic Action 13. Improvement of the website, publication of all decisions, integration of the information on the sectors under supervision in an interactive site, and publication of a calendar of publications.***

- 13.1. Reshape the website [www.cnmc.es](http://www.cnmc.es) <sup>(COM) (GS)</sup>
- 13.2. Draft and publish a calendar of publications and statistics. <sup>(PR)</sup>
- 13.3. Enhance the statistical site ([CNMC Data](#)) integrating all regulated sectors. <sup>(PR)</sup>

***Strategic Action 14. Strengthening pedagogical capabilities and submitting important matters to public debate and consultation***

- 14.1. Develop a programme for Working Documents on Competition Policy and Economic Regulation. <sup>(PR)</sup>
- 14.2. Promote the active and coordinated participation of personnel, in particular managerial staff and directors, in courses and conferences. <sup>(I)</sup>
- 14.3. Promote activities such as seminars, newsletters and contests in order to facilitate communication with stakeholders and society in general. <sup>(I)</sup>
- 14.4. Draft mechanisms for disseminating sanction decisions in relevant sectors in order to increase their deterrent effect. <sup>(COM)</sup>
- 14.5. Draft guides for action concerning obligations imposed by law on audiovisual operators. <sup>(AV)</sup>

***Strategic Action 15. Greater cooperation with the Network of EU Competition Authorities, other international authorities and regulators and multinational bodies***

- 15.1. Encourage participation of the CNMC in working groups of the European Competition Network (ECN).<sup>(C)</sup>
- 15.2. Involve the CNMC in the works leading to reform of EU competition legislation, as well as in projects for the convergence of EU Competition Law enforcement.<sup>(C) (PR)</sup>
- 15.3. Provide technical assistance to, and promote cooperation with, the competition authorities of Latin American countries.<sup>(C)</sup>
- 15.4. Enhance cooperation with the Portuguese Competition Authority in law enforcement matters, as regards both prohibited conducts and merger control.<sup>(C)</sup>
- 15.5. Promote cooperation at European level in the field of energy, especially by participating in the *Council of European Energy Regulators* (CEER) and the *Agency for the Cooperation of Energy Regulators* (ACER).<sup>(E)</sup>
- 15.6. Collaborate with the energy regulators of the Mediterranean region, especially by participating in *Mediterranean Energy Regulators* (MEDREG).<sup>(E)</sup>
- 15.7. Collaborate with Latin American energy regulators, especially by participating in the *Ibero American Association of Energy Regulatory Entities* (ARIAE).<sup>(E)</sup>
- 15.8. Promote cooperation at European level in the field of electronic communications, especially by participating in the *Independent Regulators Group* (IRG) and the *Body of European Regulators for Electronic Communications* (BEREC).<sup>(TC)</sup>
- 15.9. Cooperate with the electronic communications regulators of the Mediterranean region, especially through participation in the *Euro-Mediterranean Network of Regulators* (EMERG).<sup>(TC)</sup>
- 15.10. Cooperate with Latin American electronic communications regulators, especially through participation in the *Latin American Forum of Telecommunications Regulatory Entities* (REGULATEL).<sup>(TC)</sup>
- 15.11. Promote cooperation at regional level (MIBEL, Iberian Electricity Market) in electricity and derivatives markets.<sup>(E)</sup>
- 15.12. Promote cooperation at European level in the field of audiovisual services, especially through participation in the *European Regulators Group for Audiovisual Media Services* (ERGA), the *European Platform of Regulatory*



*Authorities (EPRA) and the European Commission's Contact Committee.*  
(AV)

- 15.13. Promote cooperation with other audiovisual regulators, particularly through the *Mediterranean Network of Regulatory Authorities (MNRA)*, the *Iberian Conference of Audiovisual Councils (CICA)* and the *Ibero American Platform of TV Regulators (PRAI)*.<sup>(AV)</sup>
- 15.14. Promote cooperation at European level in the area of postal services, especially through participation in the *European Regulators Group for Postal Services (ERGP)*.<sup>(P)</sup>
- 15.15. Promote cooperation at European level in the area of rail transport, especially through participation in the *Independent Regulators' Group - Rail (IRG-Rail)* and the *European Network of Rail Regulatory Bodies (ENRRB)*.<sup>(TR)</sup>
- 15.16. Facilitate internships in the CNMC of prominent members of other competition authorities and regulators.<sup>(I)</sup>

***Strategic Action 16. Annual review of the degree of attainment of the Strategic Plan and its appropriateness to the situation of markets. Promotion of the dialogue with different agents so as to improve their ability to act in the markets***

- 16.1. Draft and publish the annual report on the Action Plan. <sup>(I)</sup>
- 16.2. Encourage peer review with other competition authorities and regulators. <sup>(I)</sup>
- 16.3. Enhance the website, the [CNMC blog](#) and its presence on social networks, so as to raise awareness of the leniency programme and legal standing instruments. <sup>(COM)</sup>
- 16.4. Create different e-mailboxes in order to facilitate interaction and communication with civil society and thus enhance the efficiency of the CNMC. <sup>(COM)</sup>
- 16.5. Draft an IT security plan, with the aim of protecting the information made available to the CNMC. <sup>(GS)</sup>
- 16.6. Verify the application of CNMC's rules on transparency. <sup>(IC)</sup>
- 16.7. Consolidate the Group of Advisers to the Board. <sup>(I)</sup>

## **5. Strategic Actions**

The following table, extracted from the **Strategic Plan**, lists the various CNMC **Actions, Values and Objectives**.

