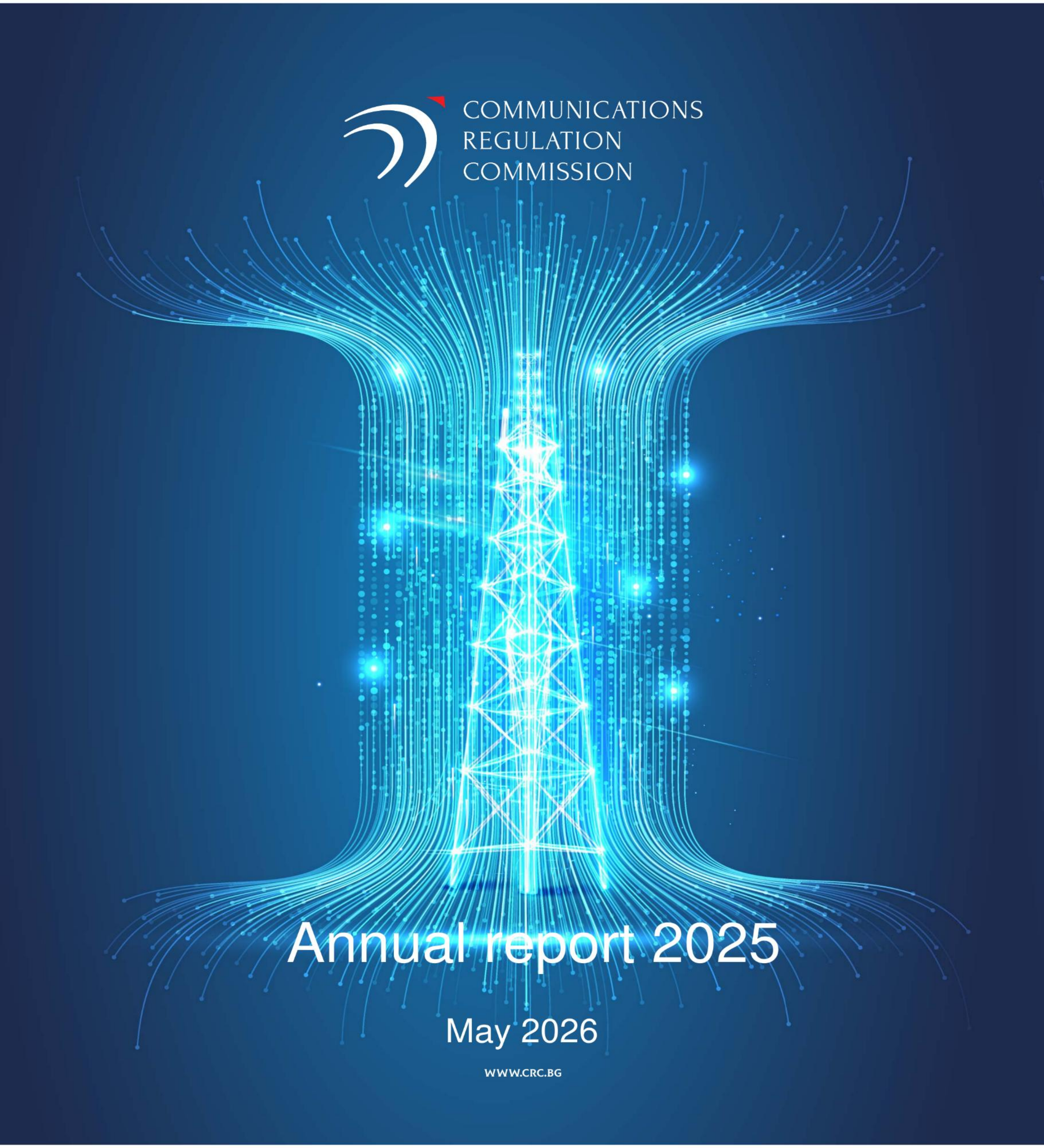
COMMUNICATIONS
REGULATION
COMMISSION



Annual report 2025

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COMMUNICATIONS REGULATION COMMISSION

A N N U A L R E P O R T 2025

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INTRODUCTION

In 2025, under the influence of new technology and accelerated digital transformation, the electronic communications sector continued to develop at an accelerated pace in a global scale, reaffirming its role as critical infrastructure for the economy and society.

The deployment of high-speed networks, the growing consumption of digital services, and the increasing reliance on reliable and secure connectivity have created not only new opportunities for innovation, but also new challenges for regulation and for ensuring a safe and secure digital environment.

In line with European and global trends, Bulgaria's electronic communications sector continued its steady development, driven by ongoing investment in infrastructure and vigorous competition, coupled with the need to improve service quality and reduce the digital divide.

In the context of this dynamic environment, the Communications Regulation Commission (CRC, the Commission), as an independent national regulatory authority, continued to pursue its priorities at both European and national levels. A Strategic Plan for the Commission's activities for the period 2025-2028 was developed and adopted. It contains a clearly formulated mission aimed at providing modern and high-quality electronic communications services to citizens and businesses by creating conditions for the development of the market for electronic communications networks and services, conditions for investments in the next generation of electronic communications networks, effective and sustainable competition in the provision of electronic communications networks and services, network and service security and equal access to services.

Three strategic objectives were set:

- An efficient and future-oriented regulatory environment;
- Promoting a sustainable competitive market and consumer protection;
- Sustainable institutional development and international partnership.

Based on its adopted three-year strategy and the strategic objectives set therein, CRC identified its key priorities for 2025, focusing on the regulatory framework, radio spectrum management, market regulation, network monitoring and supervision, international cooperation, and consumer protection.

During 2025, the Commission actively participated in the preparation of amendments to the Law on Electronic Communications (LEC) in connection with the implementation of Regulation (EU) 2022/2065 of the European Parliament and of the Council on a Single Market for Digital Services (the Digital Services Act / DSA).

In fulfilment of the Republic of Bulgaria's obligations as a Member State of the European Union to align its national legislation with EU law, amendments and supplements to the Law on Electronic Communications were promulgated in the State Gazette in November. These amendments ensured the implementation of the requirements of the DSA and harmonised the rules applicable to all intermediary services of the information society. Through the adopted amendments related to the Regulation, the status and powers of the Commission as Bulgaria's Digital Services Coordinator were established by law, giving it a key role in the implementation of the European framework for the supervision of digital services and online platforms, aimed at fostering a safer and more accountable digital environment.

Another important priority during the year was the Regulatory Policy for the Management of the Radio Spectrum for Civil Needs for the period 2025–2027, which was adopted following a public consultation process. The primary objective of this policy is to establish a sound regulatory framework for the use of the radio spectrum, promoting the development of wireless communications, providing a predictable environment, and supporting the future use of the spectrum in a manner that delivers the greatest possible benefit to society.

In 2025, through amendments to the Rules for Free Use of the Radio Frequency Spectrum, CRC transposed into the national legal framework four European Commission Decisions on the harmonised use of the radio spectrum, thereby fulfilling Bulgaria's obligations as a Member State of the European Union.

The 900 MHz frequency band was reorganised, resulting in the allocation of additional radio spectrum to the three mobile network operators and the provision of continuous frequency blocks.

The development of new technologies and the continuously increasing utilisation of the radio spectrum presented the Commission with new challenges in the areas of radio monitoring and ensuring the efficient use of the spectrum. In this context, work continued on the expansion and modernisation of the National Radio Spectrum Monitoring System for Civil Needs (NRSMS) in accordance with its Development Plan for the period 2021–2025.

The construction of an electromagnetic compatibility (EMC) laboratory also continued. It is intended to support the Commission's control activities under the LEC concerning the radio devices and to verify their compliance with the EMC regulatory documents.

In pursuit of its strategic objective of promoting a sustainable competitive market and protecting consumers, CRC continued its efforts throughout 2025 by monitoring and analysing the competitive environment in the markets for electronic communications networks and services, with a view to assessing the need for regulatory intervention in accordance with its statutory powers.

In this context, CRC continued its activities related to the collection, processing and validation of data on the development of electronic communications services in the Republic of Bulgaria through the Commission's electronic system for the submission and processing of activity reports by electronic communications undertakings and postal operators (the Online Questionnaire System). The collected, validated and processed data were used both for the performance of CRC's regulatory functions and for fulfilling its obligations to international organisations in the field of electronic communications.

During the reporting period, significant efforts were devoted to the analysis and assessment of the market for electronic communications networks and services, including work on the fourth round of the analysis of the wholesale market for local access at a fixed location. By its decision, CRC adopted the results of the public consultation on the draft decision concerning the definition, analysis and assessment of the wholesale market for local access at a fixed location.

In fulfilment of CRC's strategic objective for sustainable institutional development, the implementation and maintenance of information systems oriented to business and citizens continued, and actions were taken to ensure the maintenance of the information systems used in the Commission, some of which were upgraded. The actions taken to implement Decision No. 608/16.08.2024 of the Council of Ministers on adaptation of information systems processing financial information to work with Euro were also successfully completed.

In order to promote interinstitutional exchange of information, a Cooperation and Strategic Partnership Agreement was drafted between the National Statistical Institute (NSI) and the Communications Regulation Commission.

In pursuing its objectives and responsibilities, and in line with the regulatory policy of the European Union, CRC continued to participate actively in the work of specialised international organisations in the fields of electronic communications and postal services at global, European and regional levels. During the year, representatives of the Commission took part in numerous events organised by the Body of European Regulators for Electronic Communications (BEREC), the European Regulators Group for Postal Services (ERGP), the Electronic Communications Committee (ECC), the International Telecommunication Union (ITU), the Network of Electronic Communications Regulators of the Member States of the International Organisation of La Francophonie (FRATEL), and other international bodies.

In its capacity as a full member and partner, CRC co-organised and hosted the 64th BEREC Plenary Meetings and the General Assembly of the Independent Regulators Group (IRG), held in Sofia in October.

The matters outlined in this Introduction represent only a part of the overall activities carried out by the Commission in 2025. The specific results achieved in implementing the Commission's priorities, objectives and tasks are presented in the main body of this Annual Report, which the Commission submits pursuant to Article 38 of the Law on Electronic Communications.

I. STATE, DEVELOPMENT AND PROSPECTS OF THE ELECTRONIC COMMUNICATIONS MARKET

Methodological notes on Section I

The information provided is based on data received as of 28.04.2026 from 95.2% of the undertakings registered with CRC as of 31.12.2025. The information was provided in accordance with model forms for reporting of the activity for provision of electronic communications networks and/or services endorsed by CRC Decision No. 341/20.11.2025. A major part of the indicators monitored and included in the forms are defined by various international institutions and organisations, to which CRC by law has a commitment to regularly provide data on the electronic communications sector in Bulgaria (International Telecommunication Union (ITU), European Commission (EC), Body of European Regulators for Electronic Communications (BEREC), etc.).

In 2025, the definition of the term "bundled services" was updated (information regarding the definition is provided in section 1.2.1 below).

Pursuant to the Law on the Introduction of the Euro in the Republic of Bulgaria, financial indicators (revenues, expenses and investments) for 2025 are presented in Bulgarian levs. Data on planned investments for 2026 are presented in Euro.

When summing rounded amounts and percentage data, rounding-based calculation differences may occur due to the use of standard spreadsheet and chart functions.

The relative shares are presented with rounding up to the first decimal place. As a result of such rounding, it is possible that the sum of the relative shares exceeds or does not reach 100%.

The total number of undertakings presented in the tables for a particular market segment does not represent the sum of the number of undertakings in the individual services included in the segment. In the event that an undertaking provides more than one of those services, it is included only once in the total number of undertakings.

For the purposes of the annual report, the term "subscriber" is defined as "any natural or legal person who is a party to a contract with an undertaking providing public electronic communications services" and should be considered to be identical to "end-user, party to a contract under Article 227" in accordance with the Law on Electronic Communications (amended and supplemented SG, no. 17 of 13 February 2026).

1. Volume and structure of the Bulgarian electronic communications market

1.1. Market volume

According to data from the CRC Register[1] under Article 33, paragraph 1, item 1 LEC, as of 31.12.2025, a total of 984 undertakings were registered with the intention to provide public

[1] Register of entities that have notified the Commission of their intention to provide public electronic communications networks or services

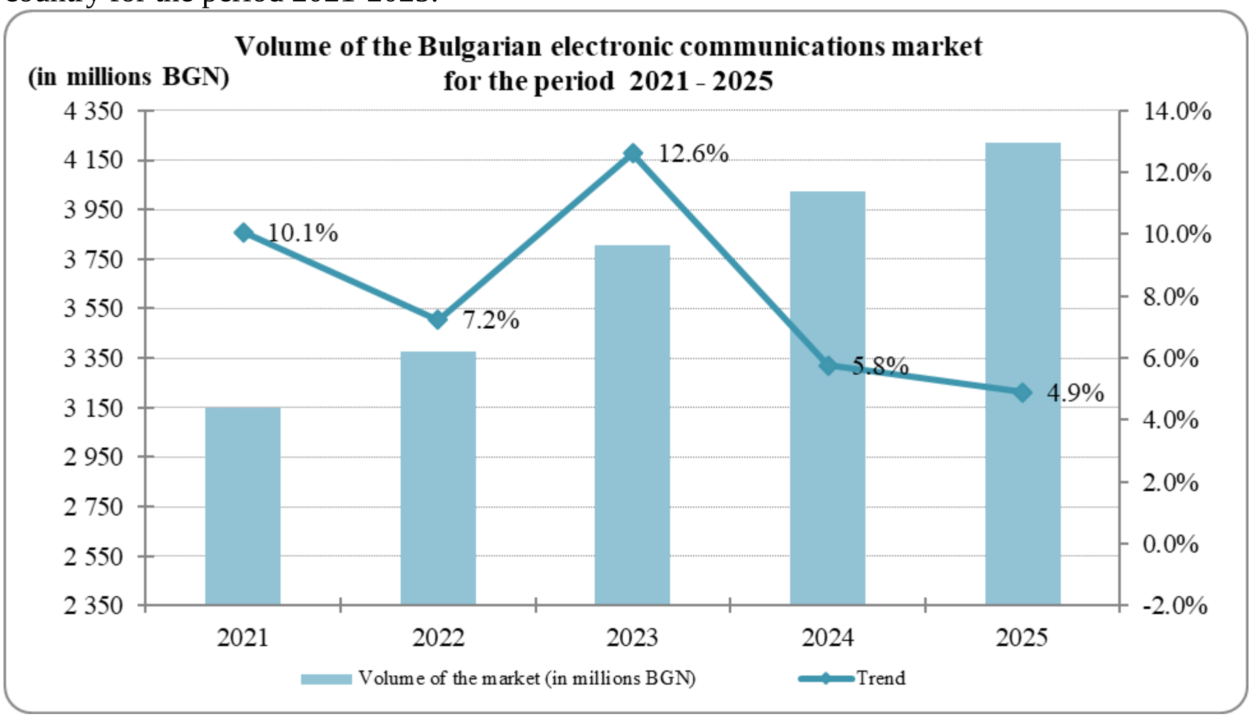
electronic communications. In implementation of Article 4 of the General Requirements[2] and Decision No. 341/20.11.2025 of CRC, a total of 937 of the undertakings registered as of 31.12.2025 have submitted to the Commission an annual activity report for 2025, i.e. 95.2% of those registered as of the said date.

In 2025, a total of 799 undertakings were active, including 8 undertakings which suspended their activity in providing public electronic communications during the year and submitted a report pursuant to Article 5 of the General Requirements (as of 31.12.2025, those undertakings were removed from the CRC Register).

In comparison to the previous reporting period (2024), a decline was reported in 2025 in the number of undertakings registered with CRC for the provision of public electronic communications (by 0.8%). At the same time, the number of undertakings that actually operated during the year decreased by 3.2%.

In 2025, the total volume of the electronic communications market in Bulgaria amounted to BGN 4.220 billion. Of these, BGN 19.970 million were generated by 435 undertakings, which reported annual revenues of less than BGN 100,000. The upward trend in the development of the market continued in 2025, with a reported growth of 4.9% compared with the data for 2024.

Figure 1 presents the dynamics in the volume of electronic communications market in the country for the period 2021-2025.



Note: *The data for 2024 have been updated.*

Source: Data submitted to CRC

Figure 1

[2] General requirements for provision of public electronic communications (amended and supplemented SG, no. 113 of 23 December 2025)

The share of the total volume of the public electronic communications market constituted 1.9% of the total GDP[3] of Bulgaria for 2025. Notwithstanding the growth reported in the total volume of the public electronic communications market, a decrease of 0.1 percentage points was observed in its share of the total GDP versus 2024, when it amounted to 2%.[4]

1.2. Market structure

Information on the structure of revenue generated from the provision of public electronic communications in Bulgaria is presented in Table 1 by segment, determined according to the type of services provided, including distributed[5] revenue from bundled services (information on the definition of "bundled services" is contained in item 1.2.1 below).

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[3] Calculated at current prices. Source: NSI (GDP - Production Method - national level | National Statistical Institute (nsi.bg)).

[4] The GDP data for 2024 have been updated. Source: NSI (gross domestic product in 2024 (updated data).

[5] The breakdown of revenue from bundled services (installation fees and monthly subscription fees for fixed and mobile voice services, Internet access and television) by type of services included in the bundle is made by the undertakings which have submitted information in their annual report. The breakdown was made based on evaluation of the prices of standalone services having close or similar characteristics (e.g.: minutes to national fixed and/or mobile networks, Internet download speed, number of television programmes, etc. included in the monthly subscription fee) of services included in the bundled service.

Table 1

Public electronic communications services	Revenue		
	2023	2024 [1]	2025
	(in millions BGN)		
1. Interpersonal communication services	1,068.099	1,036.960	1,047.273
1.1. Fixed voice service through numbers from the NNP and public payphones	69.730	60.139	53.574
1.2. Mobile voice service through numbers from the NNP	922.782	902.263	928.060
1.3. Other voice services[2]	75.587	74.558	65.640
2. Leased lines services	23.170	28.633	29.021
3. Data transfer and/or Internet access services	1,953.094	2,178.318	2,376.325
4. Transmission and/or distribution of radio and/or TV programmes services	541.424	543.522	534.853
5. Other services[3]	217.621	235.657	232.551
TOTAL	**3,803.409**	**4,023.091**	**4,220.023**

[1] The data for 2024 have been updated.

[2] Includes revenue from retail provision of VoIP service, transit of voice traffic between operators (wholesale VoIP), telephony services (incl. through non-geographic numbers from the NNP in the “90” range and SMS services in networks of other undertakings, through satellite systems, etc.).

[3] The segment includes revenue from the provision of duct network, shared use, incuding provision of towers, masts; dark fibre, co-location services other than those provided for interconnection and other services.

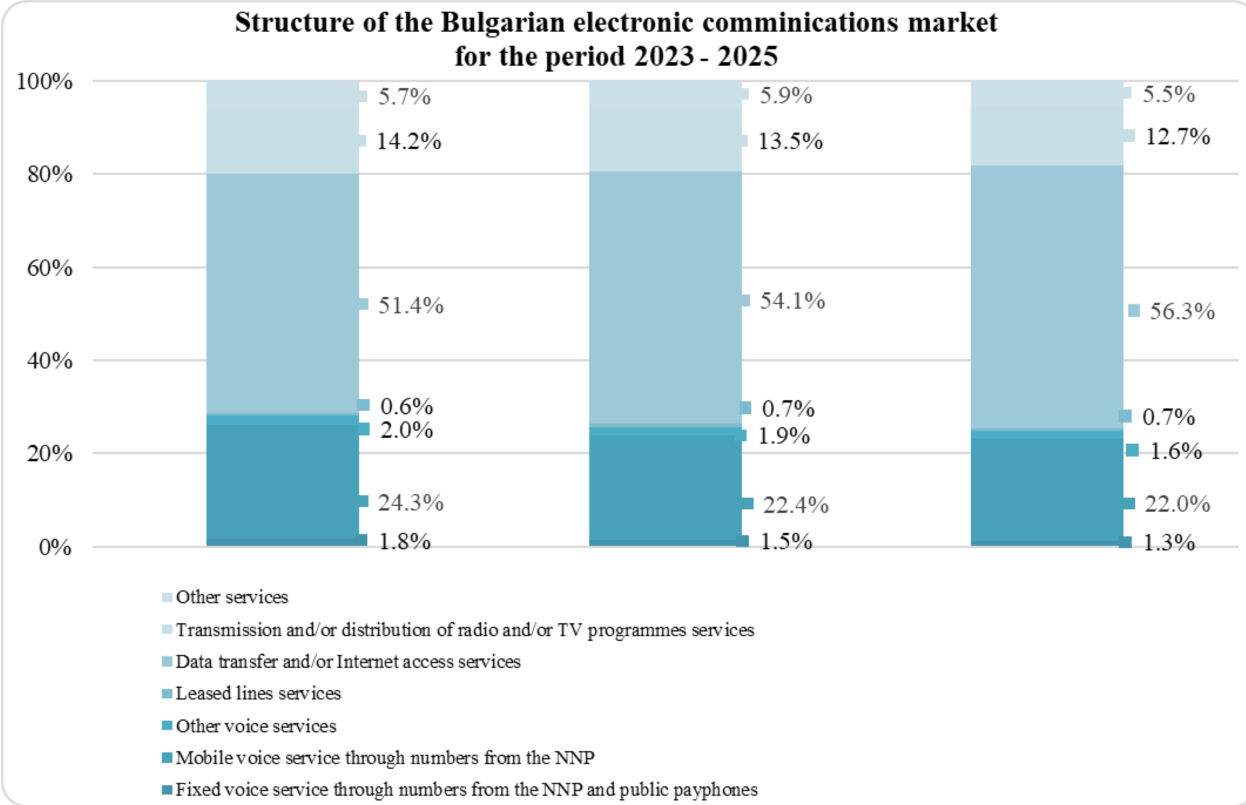
Source: Data submitted to CRC

In 2025, the total volume of the electronic communications market in Bulgaria continued to be formed mainly by revenue from interpersonal communications services and data transmission and/or Internet access services.

Revenue from data transmission and/or Internet access services held a leading position with a 56.3% share in the total market volume. The relative share of revenue from this market segment within the market structure increased by 2.2 percentage points compared with 2024.

Revenue generated from interpersonal communications services (fixed, mobile and other telephony services) decreased compared with the previous year in absolute terms by 1.0%. However, their share in the total volume of the market for public electronic communications fell by 1.0 percentage point to 24.8%.

Figure 2 presents the dynamics in the relative shares of revenue from electronic communication services within the structure of the electronic communications market for the period 2023-2025.



Source: Data submitted to CRC

Figure 2

Compared with the year before, revenue growth was observed in 2025 in the following market segments:

- "Data transmission and/or Internet access" – 9.1%; the relative share of the segment grew by 2.2 percentage points. Revenue from the "Data transmission and/or Internet access via mobile terrestrial networks" group grew by 10.3%, and revenue from the "Data transmission and/or Internet access via fixed networks" group was up by 7.0% compared with the previous year.
- "Interpersonal communications services" – by 1% in absolute terms. In this segment, revenue from mobile voice service registered growth of 2.9%. At the same time, revenue from fixed voice service through numbers from the NPP continued the downward trend observed in recent years, with the reported decrease being 10.9%.
- "Leased lines services" - an increase of 0.3% compared with the previous year, preserving their share of 0.7% in 2025 as well.

A decline in revenues during the reporting period was observed in the following segments:

- "Transmission and/or distribution of radio and TV programmes services" - revenue dropped by 1.6%, resulting in a decrease in the relative share of the segment which made up 12.7% (a decline of 0.8 percentage points compared with 2024). Only IPTV services registered growth in this segment – by 1.4% compared with 2024.

- “Other services” – the segment reported a decline of 1.3%, although revenue from shared use, including the provision of towers, masts, etc., grew by 6.8% compared with 2024. The fall in the total volume of the segment is mainly due to the decrease in revenues from the service "Provision of duct network access" by 79.4% due to the significant decline in revenues reported by Vivacom Bulgaria EAD, related to the separation in 2024 of the company’s physical infrastructure in a separate undertaking – United Fiber Bulgaria EOOD, which also led to a decrease in the relative share of the segment to 5.5% (by 0.1 percentage points).

Detailed information on the state and trends of development of the relevant market segments is presented in items 2-5 of this section of the report.

1.2.1. Bundled services

Revenue from bundled services[6] plays a significant role on the electronic communications market in Bulgaria. For another consecutive year, consumption of bundled services increased - as of 31.12.2025, 62.5% of fixed voice service subscribers, 95.1% of mobile voice service subscribers, 34.3% of fixed Internet access subscribers, 85.6% of mobile Internet access subscribers, and 49.9% of pay-TV subscribers used the service in a bundle with other electronic communications services.

As a result, the total volume of revenue (from installation fees and monthly subscription fees) gained from bundled services reached BGN 2.270 billion,[7] which represents a 10% increase compared with the revenue the year before.

It should be borne in mind that the definition of the term “bundled services” was updated in 2025 to cover commercial offers offered on the basis of both a subscription and a prepaid plan, involving two or more electronic communications services. The change affects the comparability of the data compared with the previous reporting period and has been taken into account in the analysis of trends in the indicators.

Market players

According to the data submitted to CRC in 2025, two undertakings have launched activity for the provision of a bundled service - in particular, double-play package including fixed Internet access and television, while five undertakings have discontinued the provision of such services. In this way, in 2025, the total number of undertakings providing bundled services amounted to 86, which is by 3 less in comparison with the previous year (89 in 2024).

The main providers of bundled services were A1 Bulgaria EAD (A1), Vivacom Bulgaria EAD (Vivacom), and Yettel Bulgaria EAD (Yettel). In 2025, they accounted for

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[6] “Bundled services” shall mean commercial offers offered on the basis of subscription or prepaid plan, comprising two or more of the following services: (1) Fixed broadband Internet access, (2) Fixed voice service, (3) Mobile voice service, (4) Mobile broadband Internet access, and (5) pay-TV (cable, satellite, or IPTV). The individual services included in a bundled service are offered as part of a single package at a single price and are billed through a single invoice covering all included services. The bundle is provided under terms and conditions that cannot be achieved by combining the corresponding services when purchased separately. For prepaid “bundled services”, the data include all unique SIM cards that were active as of 31 December of the respective year and from which at least one outgoing or incoming call was made or received, at least one SMS/MMS was sent or received, or Internet access was used at least once during the preceding three months.

[7] The data are included in the total volume of the electronic communications market, distributed by service.

98.0% of the segment volume, calculated on the basis of the revenue generated, and covered 98.6% of the total number of subscribers to bundled services. Each of the remaining undertakings providing bundled services has a share that does not exceed 1.0% of the total number of subscribers to bundled services.

Table 2

Market shares of undertakings providing bundled services

Undertaking	2024		2025	
	Share based on the number of subscribers to bundled services	Share based on revenue from bundled services	Share based on the number of subscribers to bundled services	Share based on revenue from bundled Services
A1 BULGARIA	37.2%	38.3%	35.8%	38.0%
VIVACOM BULGARIA	32.9%	30.2%	34.2%	31.7%
YETTEL BULGARIA	28.3%	29.3%	28.6%	28.3%
All other*	1.7%	2.2%	1.4%	2.0%

*Note: *Including the providers of bundles with a share not more than 1% of the total number of subscribers to bundled services.*

Source: Data submitted to CRC

In 2025, there was an increase in the market shares of Vivacom and Yettel, with an increase of 1.3 percentage points for the first undertaking and 0.4 percentage points for the second. A1 reported a decline of 1.4 percentage points. The share of subscribers of all other undertakings dropped to 1.4% of the total number of subscribers to bundled services (down by 0.3 percentage points).

In the market shares of undertakings, calculated on the basis of revenue from the provision of bundled services, the following changes were observed: Vivacom was the only one to report growth of 1.5 percentage points year on year, while A1 and Yettel registered decline by 0.3 and 1.0 percentage points, respectively. The total market share of the remaining market players made up 2.0%, down by 0.2 percentage points compared with 2024.

Subscribers to bundled services

The number of subscribers to bundled services toward the end of 2025, according to the data submitted by the undertakings providing public electronic communications in Bulgaria, increased by 16.6% year on year to reach 8.468 million. As a result, the value of the “penetration by population”[8] indicator grew by 19 percentage points to arrive at 131.8%, confirming the high level of penetration of bundled services in the country.

In 2025, the share of subscribers to bundles formed by two electronic communications services (double-play) represented 99.6% of the total number of subscribers to bundled services,

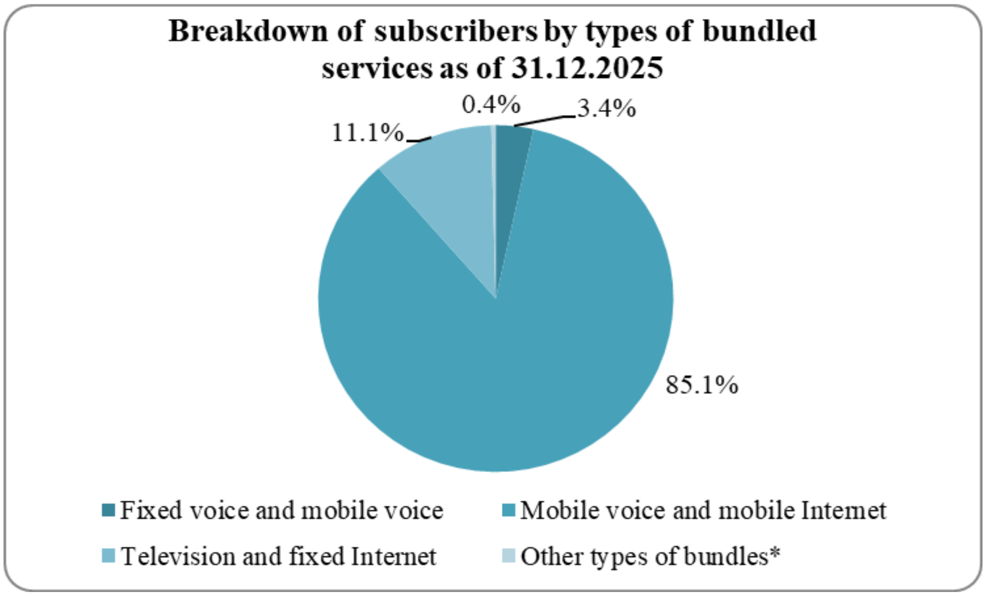
[8] The indicator was calculated as the ratio between the total number of subscribers to bundled services as of 31 December of the respective year and the number of population according to NSI data as of the same date (https://www.nsi.bg/bg/content/2975/население-по-области-общини-местоживеене-и-пол).

as it grew by 0.3 percentage points compared with 2024 with a 17.0% increase in their number in absolute terms.

During the reporting year, demand for triple-play bundles declined, with the number of subscribers down by 38.6% compared with 2024. However, this decline did not have a significant impact on their market share which stood at 0.3% (a decrease of 0.3 percentage points year on year).

As in previous years, the number of quadruple-play bundles also continued to decline in 2025, falling by 38.2% in absolute terms, as their share reached 0.04%.

Figure 3 presents the breakdown of subscribers by the most preferred bundled services in 2025.



Note: *"Other types of bundles" include the subscribers to bundled services, each accounting for no more than 1.0% of the total number of subscribers to bundled services.*

Source: Data submitted to CRC

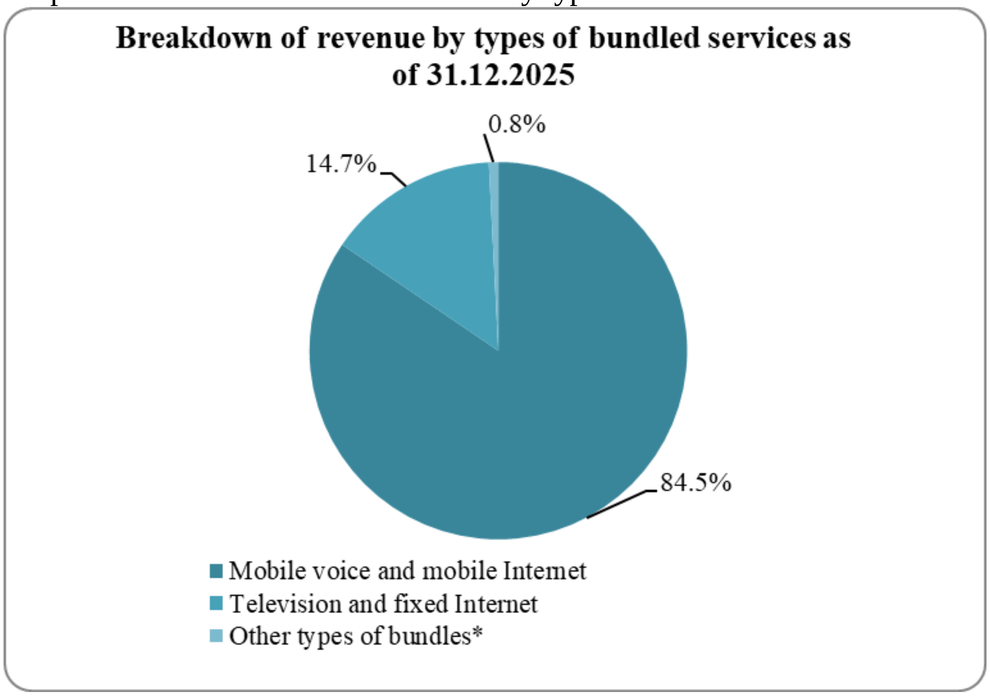
Figure 3

The most preferred bundled service remains the combination of “mobile voice service and mobile Internet access”. The number of subscribers rose by 18.5% to reach 7.208 million, with its share up to 85.1% (an increase of 1.4 percentage points in relative terms). The second most widely used type of bundle was the “TV and fixed Internet access” bundle, with 937 thousand subscribers. Despite a 12.7% increase in absolute value, its share declined by 0.4 percentage points in relative terms. Fixed voice service and mobile voice service in a bundle, with a relative share of 3.4% of the total number of bundled service subscribers, was used by 289 thousand subscribers (down by 2.5% in absolute value and by 0.7 percentage points in relative terms).

Revenue from bundled services

Revenue from bundled services amounted to BGN 2.270 billion in 2025, registering growth of 10.0% year on year. The highest share in the total volume of revenue (99.4%) continued to be held by double-play packages which, as compared with 2024, reported growth of 10.8% in absolute terms and an increase of 0.7 percentage points in their share. The share of revenue from triple-play bundles dropped to 0.5% (down by 0.6 percentage points in 2025), with a significant decrease of 50.6% in absolute terms. Revenue from quadruple-play bundles continued to decline in 2025 (by 42.3%) compared with 2024, with their share accounting for 0.1% (by 0.1 percentage points less than in 2024).

Figure 4 presents the breakdown of revenue by type of bundled services in 2025.



Note: *"Other types of bundles" include revenue from bundled services, each accounting for no more than 1.0% of the total revenue from bundled services.*

Source: Data submitted to CRC

Figure 4

In 2025, the share of revenue from the most preferred bundled service including mobile voice service and mobile Internet access rose by 1.1 percentage points versus 2024 to reach 84.5% of the total volume of revenue from bundles, with the revenue registering growth of 11.4% in absolute terms. The share of revenue from the double-play bundled service “TV and fixed Internet” amounted to 14.7%, decreasing by 0.2 percentage points, despite the reported growth in revenue of 8.3% in absolute values. The combined share of the remaining types of bundles, each accounting for no more than 1.0% of total revenues from bundled services, amounted to 0.8%, decreasing both in absolute terms (by 45.5%) and in terms of its relative share (by 0.8 percentage points).

Summary

In 2025, the following trends were observed in the bundled services:

- Increase in consumption and revenues from bundled services;
- Maintaining the dominant role of the double-play bundles;
- Reduced interest in more complex bundle combinations (triple- and quadruple-play bundles);
- Once again, the most preferred bundled services were those that included mobile service – 88.9% of the total number of subscribers to bundled services used bundles with mobile voice included, while 85.4% of the subscribers used bundles with mobile Internet included;
- The growth in the total volume of revenue from bundled services was mainly due to the increase in revenue generated from bundles with mobile Internet access, fixed Internet access included and in revenue from bundles with television service included;

The segment is highly concentrated and there was no new redistribution of market shares among the three largest undertakings in 2025, with their total share based on number of subscribers amounting to 98.6%. The largest market share was retained by A1, followed by Vivacom and Yettel. The share of smaller providers remained low.

1.2.2. Investments

In 2025, a total of 352 undertakings (by 15 less than in 2024) declared that they had invested funds in the construction and maintenance of public electronic communications networks amounting to BGN 680.835 million, registering annual growth of 0.7% in the investments made.

Investments in fixed networks in 2025 increased to BGN 121.195 million (by 24.5%), which represents a recovery after the reported decline in 2024. At the same time, investments in NGA networks have also increased to BGN 58.074 million (growth of 26%), which indicates an increasing interest in the development of high-speed fixed infrastructure.

In 2025, mobile networks saw a decrease in investment by 6.8% (BGN 264.251 million) compared with 2024, however, these investments continued to account for a significant share of total investments (38.8%).

During the reporting year, investments in the “Other” category remained practically unchanged (–0.02% in absolute terms), amounting to about BGN 295.390 million, and continue to form the largest relative share in the overall investment structure, amounting to 43.4%.

2. Interpersonal communications services

The “Interpersonal communications services” segment includes the following public electronic services:

- fixed telephony service provided through numbers from the National Numbering Plan (NNP) and through public payphones;
- mobile telephony service provided through numbers from the NNP (including SMS[9] and MMS[10]) and
- other voice services (retail provision of VoIP; transit of voice traffic between operators (wholesale VoIP); services provided through non-geographic numbers from the NNP of the "90" range serviced in networks of other undertakings; telephony services

provided through satellite systems, etc.).

Table 3 provides information on the key indicators characterising the reviewed segment in 2025, namely: number of undertakings which provided the relevant services during the year, number of subscribers/lines, and the amount of annual revenue generated.[11]

Table 3

Number of undertakings, number of subscribers/lines and revenues by type of voice services provided in 2025

Name of service	Number of undertakings that provided the service in 2025	Number of subscribers/lines as of 31.12.2025		Revenue (in million BGN, excluding VAT)	
		Total[1]	including subscribers to bundled services	Total[2]	including from bundled services
1. Fixed telephony service through numbers from the NNP and through public payphones	30	472,035*	294,869	**53.574**	1.742
2. Mobile telephony service through numbers from the NNP	3	7,914,726	7,526,227	928.060	611.650
3. Other services related to the provision of voice telephony	25	///	///	**65.640**	///
Total	**51**	///	///	**1,047.273**	**613.392**

[1] Including subscribers to bundled services.

[2] Including the share of revenue from the provision of voice services bundled with other electronic communication services.

* Number of lines of subscribers to a fixed telephony service.

Note: *The symbol /// used in this document means that the information is not applicable to the indicated parameter or is confidential.*

Source: Data submitted to CRC

In 2025, a total of 51 undertakings declared activity of providing services included in the "Interpersonal communications services" segment, by 2 undertakings more than the year

[9] Short message service.

[10] Multimedia messaging service.

[11] Detailed information on the provision of fixed and mobile telephony services through numbers from the NNP is presented in item 2.1 and item 2.2.

before.[12] The highest number of undertakings - a total of 30 - declared activity of providing a fixed telephony service (fixed voice service) through numbers from the NNP and/or wholesale interconnection services. Undertakings providing mobile telephony services through numbers from the NNP remained 3 in 2025 as well. Providers of other services related to the provision of voice telephony amounted to 25, most of which (21 undertakings) declared the retail or wholesale provision of VoIP services (transit of voice traffic between operators).

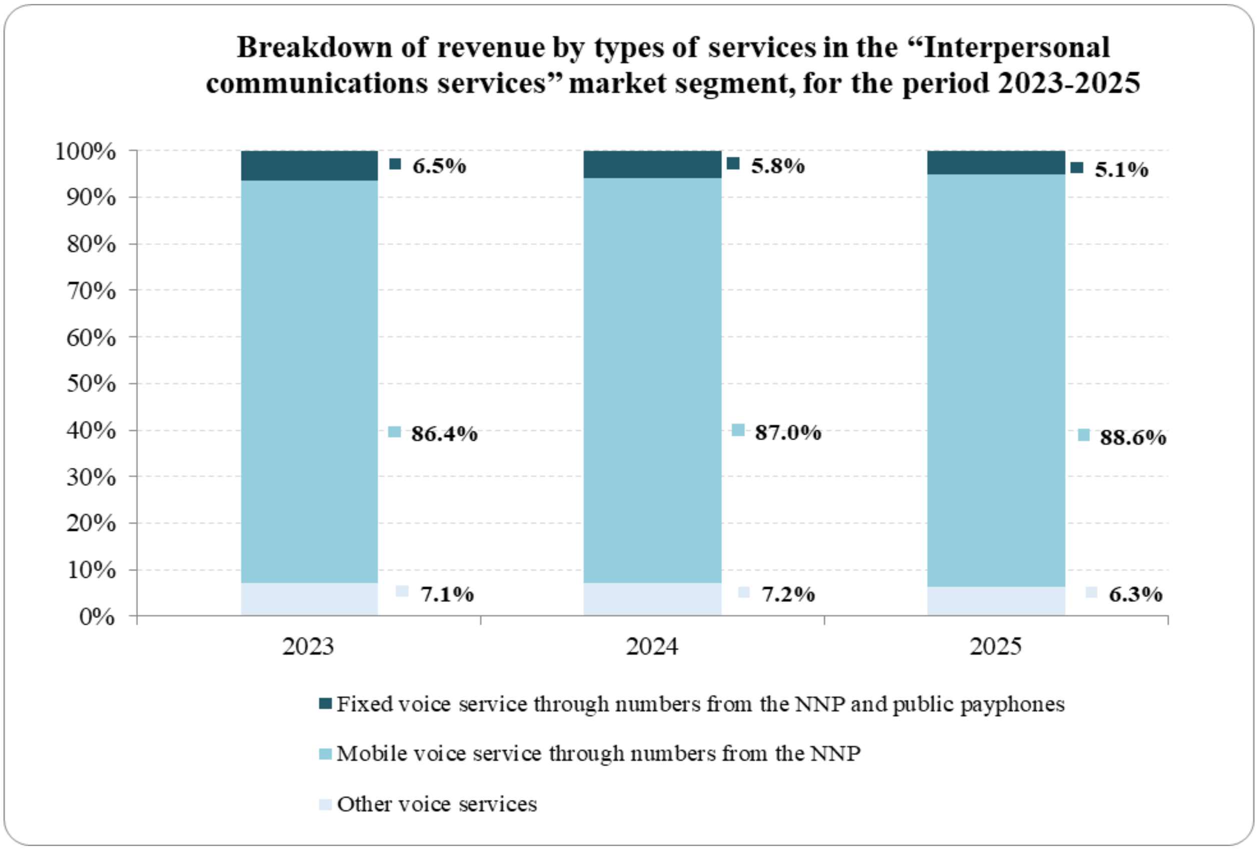
The total volume of revenue generated from services included in the “Interpersonal communications services” segment amounted to BGN 1,047.273 million for 2025, registering an increase of 1.0% compared with the segment’s volume in 2024 (BGN 1,036.960 million), with a 2.9% decline for the previous one-year period (2023-2024). The increase in the amount of revenue from services included in the segment is due to the 2.9% growth, compared with the previous year, in the revenue from the provision of mobile telephony service through numbers from the NNP.

In terms of the other services forming the individual groups in the segment, the following changes in absolute value were reported in 2025 year on year:

- A decrease of 10.9% was registered in the volume of revenue generated from the provision of services in the “Fixed voice service through numbers from the NNP and public payphones” group in 2025 compared with 2024. For the previous one-year period (2023-2024), a decrease of 13.8% in the revenue from these services was recorded;
- The total amount of revenue generated by the provision of services included in the “Other services related to the provision of voice telephony” group was by 12% less in 2025 compared with the previous reporting year. In 2025, the main share of the revenue in this group of services - 73.2% - continued to be formed by the provision of voice transit services between operators (whole VoIP), with this share amounting to 79.3% in 2024.

As there were no significant changes in the absolute amount of revenue generated by any of the three main service groups, the structure of the "Interpersonal communications services" segment remained largely unchanged.

[12] The data for 2024 have been updated following the provision of additional information from undertakings providing services in the "Interpersonal communications services" segment. According to the updated data, the total number of undertakings that had declared activity of providing interpersonal voice telephony services amounted to 49. A total of 31 undertakings provided a fixed telephony service through numbers from the NNP and/or wholesale public telephone network interconnection services, including the three undertakings which provided a mobile telephony service as well. A total of 22 undertakings reported providing other services related to the provision of voice telephony, including VoIP services.



Source: Data submitted to CRC

Figure 5

As shown in the figure above, the largest share of the market segment (88.6%) is accounted for by revenue from mobile voice services. Its share increased by 1.6 percentage points year on year, compared with an increase of 0.6 percentage points in the previous period. In 2025, revenue from other services related to the provision of voice telephony (primarily VoIP) accounted for 6.3%. Despite a year-on-year decrease of 0.9 percentage points, its share continued to exceed that of traditional voice services (fixed voice services provided through numbers from the NNP and public payphones). The share of revenue from traditional voice services continued to decline for another consecutive year, reaching 5.1%. The decrease in its share within the segment amounted to 0.7 percentage points in 2025, the same as in 2024 compared with 2023.

2.1. Fixed telephony service through numbers from the NNP

Market players

As of 31.12.2025, a total of 45 undertakings had notified CRC of their intention to provide number-based interpersonal communications services, namely fixed voice services using assigned numbers, including nomadic services, and/or access to national non-geographic services using numbers. Primary numbering resources from the NNP, comprising geographic numbers and/or non-geographic numbers for access to national non-geographic services, have been assigned to 20 undertakings.

A total of 30 undertakings declared activity of providing fixed voice service through numbers from the NNP and/or wholesale public telephone network interconnection services to end-users in 2025. The number of providers reporting the provision of voice services to end-users through geographic numbers and/or non-geographic numbers amounted to 25. Of these, 13 undertakings provided the service using primary numbering resources assigned from the NNP, while the remaining 12 providers reported reselling fixed voice services using secondarily assigned geographic numbers and/or non-geographic numbers for access to national non-geographic services. In 2025, as in the previous year, an activity of providing voice service through public payphones/booths was declared solely by Vivacom. The number of undertakings (a total of 5 undertakings) that declared activity of providing wholesale services only ("transit" and "physical interconnection") which are relevant to the provision of a fixed telephony service through numbers from the NNP, also remained unchanged since the year before.

The data reported by undertakings on the provision of retail fixed voice services through numbers from the NNP show that A1, Vivacom and Yettel remained the principal providers of these services in 2025. Their aggregate market share, calculated on the basis of the number of fixed voice subscriber lines, remained broadly unchanged year on year and stood at 97.7% at the end of the reporting year, compared with 97.8% in 2024. There were also no significant changes in the individual market shares of these undertakings. Vivacom continued to hold the largest market share, despite a decrease of 1.3 percentage points. For another consecutive year, A1 retained second place with a market share of 24.4%, which remained almost unchanged compared with the previous reporting period. Yettel recorded an increase of 1.1 percentage points in its market share, calculated on the basis of the number of fixed subscriber lines. This was attributable to the smaller decline in the absolute number of the undertaking's subscriber lines compared with the overall decline in the total number of subscriber lines across all providers during 2025. The aggregate market share of all other providers remained stable over the reporting period, amounting to 2.3% in the current reporting period, compared with 2.2% the year before.

Table 4

Market shares of undertakings providing retail fixed voice service

Undertaking	2024		2025	
	Share based on number of subscriber lines	Share based on revenue from subscribers	Share based on number of subscriber lines	Share based on revenue from subscribers
VIVACOM BULGARIA EAD	56.5%	81.8%	55.2%	81.5%
A1 BULGARIA EAD	24.5%	5.1%	24.4%	4.8%
YETTEL BULGARIA EAD	16.9%	6.6%	18.0%	7.0%
All other	2.2%	6.5%	2.3%	6.8%

Source: Data submitted to CRC

No significant changes were observed in the market shares calculated on the basis of revenue generated from the provision of fixed voice services to end-users. The three principal providers of these services (A1, Vivacom and Yettel) accounted for a combined market share of 93.2%, representing a decrease of 0.3 percentage points compared with the previous reporting period, when they generated a total of 93.5% of the revenue generated from the provision of the service to end-users. Vivacom, which held the largest market share based on this indicator, recorded a decline of 0.3 percentage points in its individual market share. The other two undertakings also recorded only minor changes. A1's market share declined by 0.3 percentage points, while Yettel's increased by 0.4 percentage points, from 6.6% to 7.0%.

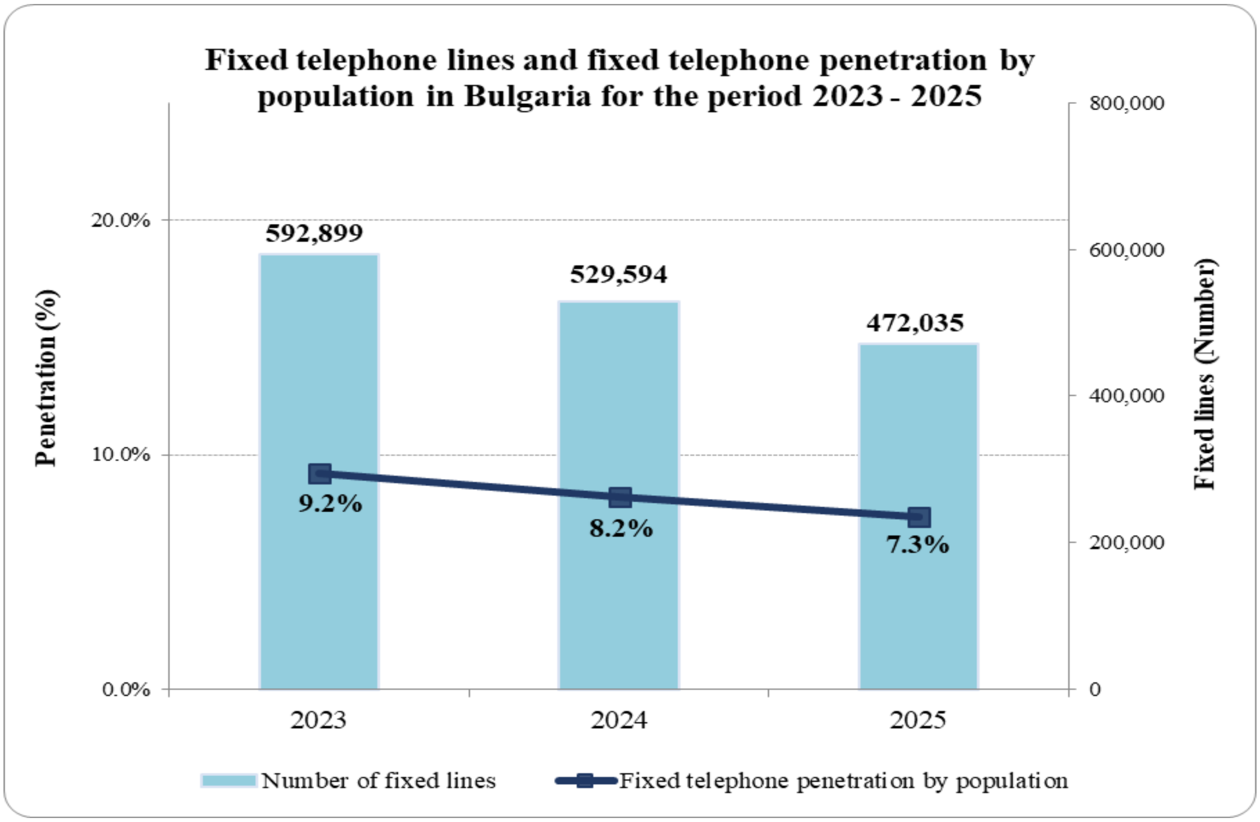
The aggregate market share of the remaining market players, calculated on the basis of revenue from the provision of fixed voice service to end-users, increased by 0.3 percentage points - from 6.5% in 2024 to 6.8% in 2025.

Lines of fixed voice service subscribers

The number of lines of fixed voice service subscribers declared by the undertakings as of 31.12.2025 totalled 472,035. For another consecutive year, the data reported by undertakings indicate a continuing downward trend in the number of fixed voice access lines. By the end of 2025, the total number of fixed voice access lines had decreased by 10.9% compared with the end of 2024. This decline was broadly comparable to that recorded during the previous reporting period (2023–2024), when the total number of access lines fell by 10.7%.

As a result of the annual decrease in the total number of fixed lines in absolute value (by 20.4% in 2025, compared with 2023), the value of the “fixed telephone penetration by population” indicator also dropped, down to 7.3% in 2025.[13] Figure 6 presents information on the variation in the number of fixed lines of voice service subscribers and the fixed telephone penetration by population for a three-year period.

[13] The indicator was calculated as the ratio between the number of subscribers to voice services as of 31 December of the respective year and the number of population according to NSI data as of the same date (https://www.nsi.bg/bg/content/2975/население-по-области-общини-местоживеене-и-пол).



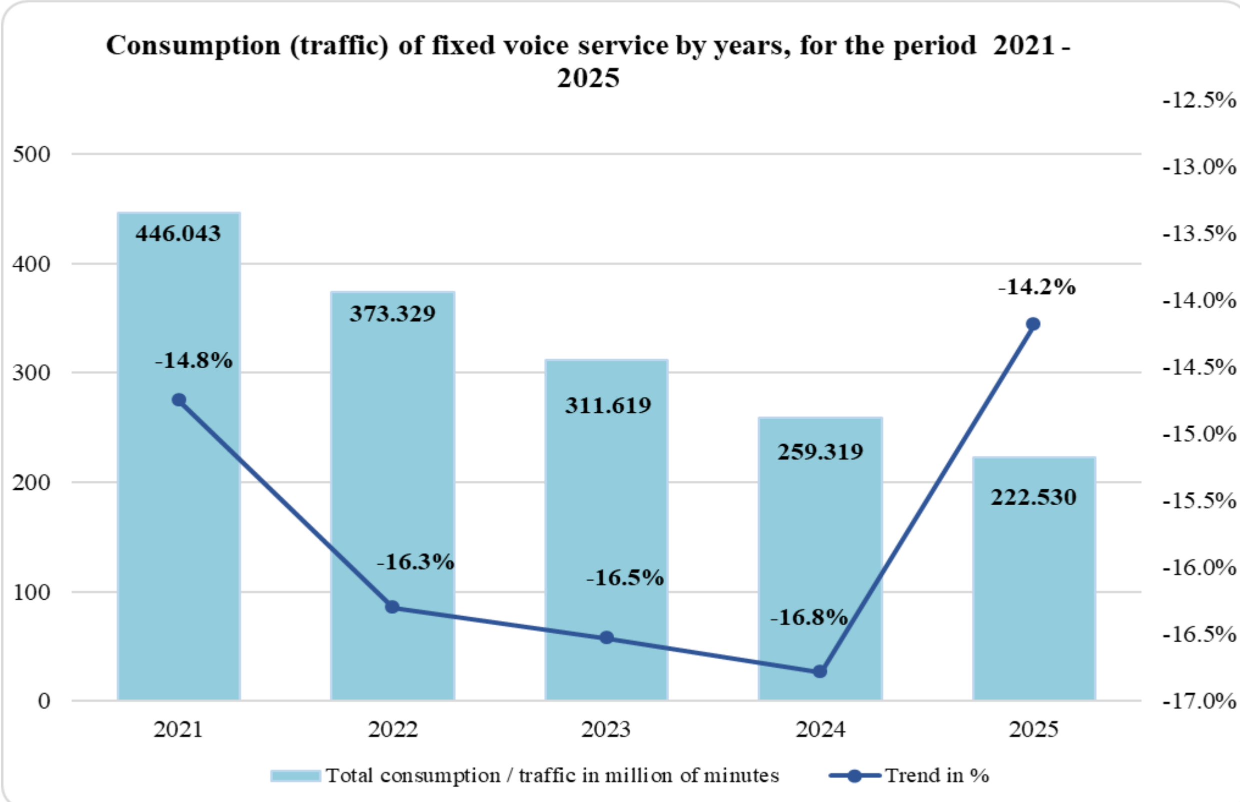
Source: Data submitted to CRC

Figure 6

The number of Vivacom's fixed voice access lines declined by 12.9% in 2025 compared with 2024, following a decrease of 12.0% in the previous reporting period (2023–2024). This represents a faster rate of decline than that recorded for the overall number of subscriber lines. The remaining undertakings recorded an aggregate decrease of 8.3% in the number of their subscribers' fixed voice access lines, compared with a decline of 8.9% in the previous reporting period.

Consumption (traffic) of fixed voice service

The total consumption of the fixed voice service includes the volume of outgoing traffic (in minutes) generated by the end-users of the service when making national (local and long-distance calls, calls to mobile terrestrial networks and to non-geographic numbers) and international calls over a one-year period. According to data provided by the undertakings, the total volume of voice traffic generated from calls made by subscribers in 2025 amounted to 222.530 million minutes, compared with 259.319 million minutes in 2024, which represents a decrease of 14.2% over the one-year period. The data on call traffic generated by end-users show that the total volume of voice traffic continued to follow a downward trend. However, in 2025 compared with 2024, the rate of decline slowed down, approximating the level of the change recorded in 2021 compared with 2020 (a decrease of 14.8%).

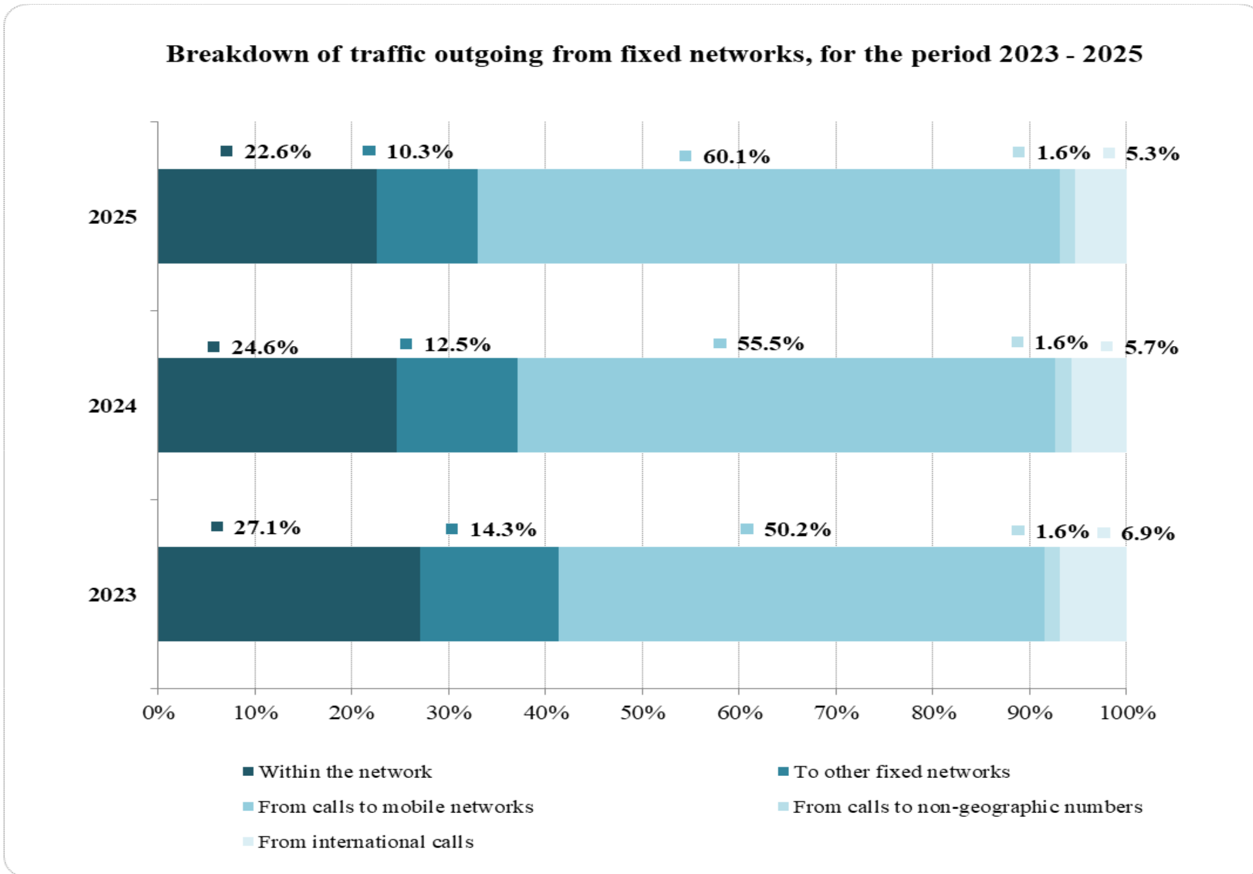


Source: Data submitted to CRC

Figure 7

In 2025, the service provision model remained unchanged, characterised by the inclusion of a large volume of call traffic in the monthly subscriptions of fixed voice service subscribers, although a decline in the share of this type of traffic was recorded. During the current reporting year, the share of generated traffic paid for outside subscription plans increased by 2.0 percentage points (reaching 13.7% in 2025, compared with 11.7% in the previous year). The share of traffic included in subscription plans relative to the total volume of call traffic generated by end-users, although lower than in 2024, remained high at 86.3% in 2025.

The breakdown of the total volume of outgoing traffic from fixed networks in the period 2023-2025, depending on the call directions, is presented in Figure 8.



Source: Data submitted to CRC

Figure 8

Over the period 2023–2025, as expected, a decrease was observed both in the total volume of outgoing traffic generated and in the volumes of traffic generated for the various call destinations (within the undertaking’s own network (on-net), to other fixed networks (off-net), to mobile networks, to non-geographic numbers, and to networks abroad). The following changes in outgoing call traffic were observed over the 2024–2025 period:

- For another consecutive year, calls to mobile networks accounted for the largest share of total traffic, representing 60.1% of the total volume. Over the one-year reporting period, this share increased by 4.6 percentage points. This increase was attributable to the slower rate of decline in the absolute volume of traffic to mobile networks (down by 7.1% in 2025 compared with 2024), relative to the rates of decline recorded for traffic volumes associated with the other call destinations.
- The second largest category, accounting for 22.6% of total traffic in 2025, was on-net traffic (calls within the undertaking's own network). Its share decreased by 2.0 percentage points compared with 2024. In absolute terms, the volume of this type of traffic declined by 21.0% over the one-year period.
- Call traffic to other fixed networks (off net) dropped by 29.2% in absolute value, and its share decreased by 2.2 percentage points to 10.3% year on year.
- For calls to networks abroad, the rate of decline in absolute traffic volume slowed down to 20.3% in 2025 compared with 2024, versus a decline of 30.2% in the previous one-year period. Nevertheless, the share of this type of traffic in the total volume of outgoing traffic decreased once

again, by 0.4 percentage points compared with the previous year, reaching 5.3% in 2025.

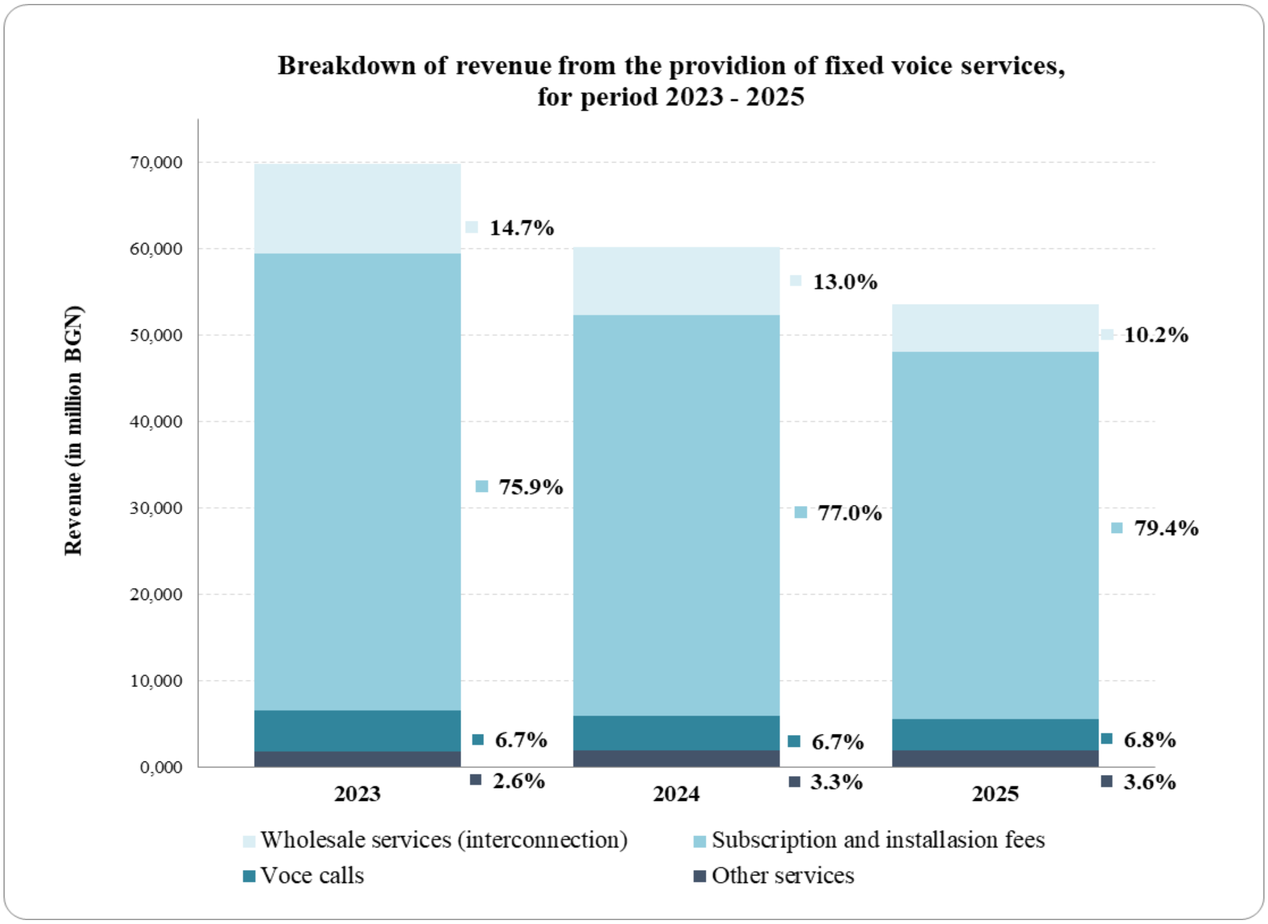
- For another consecutive year, throughout the period 2023–2025, the share of traffic generated by calls to non-geographic service numbers and short numbers remained unchanged at 1.6% of the total traffic volume. In absolute terms, the decline in this traffic in 2025 (15.9%) was broadly comparable to that recorded in the previous period (16.4%).

The shrinking use of the fixed voice service by end-users, as expected, affected the related wholesale call termination service on fixed networks. According to the data reported by undertakings on the provision of fixed call termination services, the total volume of traffic originating from domestic networks and terminated in fixed networks decreased by 6.9% in 2025 compared with 2024, following a decline of 10.7% in the previous one-year period. In 2025, the largest decrease in the volume of terminated traffic was reported in the traffic generated from geographic numbers and terminated in geographic numbers – by 25.7% (the decrease in 2024 compared with 2023 was by 26.6%). The volume of traffic originating from mobile numbers and terminated in geographic numbers on fixed networks also declined at a slower rate. The decrease amounted to 5.9% in 2025 versus 2024, compared with a decline of 9.7% in the previous reporting period (2023–2024). A decrease was also reported in the volume of traffic terminated on national fixed networks from calls generated from networks abroad, which in 2025, compared with 2024, amounted to 19.0%, with a drop of 21.2% for the previous period (2023-2024). In 2025, the volume of terminated traffic from calls to non-geographic numbers on fixed networks remained almost unchanged – a slight increase of 0.4% was observed compared with the year before.

In the structure of the total volume of traffic terminated on fixed networks, the largest share was traffic generated from mobile networks in the country (including generated from own mobile network) – 71.8% for 2025 versus 69.8% for the previous year. In the volume of terminated national traffic, this share amounted to 80.9% in 2025, up by 0.8 percentage points compared with its value (80.1%) in 2024. In comparison, the share of traffic generated from geographic numbers and terminated in geographic numbers in the total volume of terminated national traffic accounted for as little as 7.0% in 2025, down by 1.7 percentage points compared with the previous year, when it amounted to 8.7%.

Revenue from fixed voice service

According to data declared by the undertakings, in 2025, the total volume of revenue generated from the provision of fixed voice service amounted to BGN 53.574 million, registering a decline of 10.9% compared with 2024. The main share in the structure of revenue was formed by installation and subscription fees for the provision of fixed voice service to end-users, including the part of a bundled service. The share increased once again - by 2.4 percentage points - compared with the previous year, reaching 79.4% in 2025, up from 77.0% in 2024.



Source: Data submitted to CRC

Figure 9

In absolute value, the changes in the main groups of revenue from the provision of fixed voice service, presented in Figure 9, in 2025 versus 2024, were are as follows:

- drop of 8.2% in the volume of revenue generated from the provision of access to the fixed voice service (installation and subscription fees), with a decline of 12.6% in 2024 compared with 2023;
- revenue generated from calls beyond the subscriptions for the reporting period fell by 10.0%, with a decrease of 13.7% for the period 2023-2024;
- the main share in the "Other services" group (85.6%) was formed by revenue from the provision of non-geographic numbers for access to national non-geographic services to applicants for short and/or non-geographic numbers, with a 1.0% decline registered in absolute terms of this revenue for 2025;

In the total volume of revenue from the provision of wholesale services (including interconnection services - generation, termination, transit and physical interconnection) in 2025, there was a decline of 29.9% compared with 2024, with a drop of 23.7% for the previous reporting period. This decrease in the volume of revenue generated in 2025 is mainly due to a decrease of 36.6% in voice traffic transit revenue.

Summary

The well-established long-term downward trend in the consumption of the service continued in 2025, with the following changes observed in the key indicators:

- in 2025, the number of fixed voice subscriber lines fell by 10.9% compared with 2024, following a decrease of 10.7% in the previous reporting period (2023-2024);
- the total volume of call traffic generated by end-users decreased by 14.2% over the one-year period. The sharpest decline was recorded for calls to other fixed networks (by 29.2%), while, for another consecutive year, the smallest decrease was observed in the volume of traffic generated by calls from fixed voice service subscribers to mobile voice service subscribers (by 7.1%);
- in 2025, revenue from the provision of fixed voice services to end-users (subscription fees, installation fees, and call charges) continued to account for the largest share of total revenue (86.2%) generated from the provision of fixed telephony services through numbers from the NNP. Despite the reported decrease of 8.3% in absolute terms of these revenues compared with the previous year, their share in the total volume increased by 2.5 percentage points;
- there was no change in respect of the main service providers. A1, Vivacom, and Yettel formed a total of 97.7% of the market volume, measured on the basis of the number of lines of subscribers to fixed voice service, and 93.2% of the revenue generated from subscribers to the service provided at retail level.

The data reported by service providers for 2025 once again confirm the continuing downward trend in the consumption of fixed voice services. The decline in demand for traditional fixed voice services is expected to continue in the next reporting year, as end-users of interpersonal communications services increasingly shift towards Internet-based applications for interpersonal communications. According to the National Statistical Institute (NSI), the share of users making use of Internet applications for communication increased in 2025 compared with the previous year.[14] In 2025, 75.6% of Internet users made telephone and video calls via the Internet, compared with 71.4% in 2024, while 71.0% used instant messaging services, up from 64.9% in the previous year.

2.2. Mobile telephony service through numbers from the NNP

Market players

As of 31.12.2025, a total of 5 undertakings held registration in the CRC's Public Register for providing interpersonal communications services with numbers – mobile telephony service through assigned numbers (mobile voice service). These are A1, Vivacom, Vodafone Enterprise Bulgaria EOOD, Yettel and Twilio Ireland Limited. Three of them (A1, Vivacom, and Yettel) held both registration in the Register for the provision of the service and authorisations for the use of individually assigned scarce resource – radio spectrum, and have been provided with codes for access to digital mobile networks (non-geographic numbers from the NNP for the provision of mobile telephony service). According to the annual activity reports submitted to CRC, these

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[14] Internet users by purpose of use | National Statistical Institute

three undertakings provided mobile voice services throughout 2025. Information on their market shares, measured by the number of subscribers (as of 31 December 2024 and 31 December 2025) and by retail revenue from the provision of the service,[15] is presented in Table 5 below. As shown in the table, A1 continued to face competitive pressure from Vivacom and Yettel in 2025, resulting in a loss of 0.6 percentage points in its market share, measured by the number of subscribers, compared with 2024. Nevertheless, A1 retained its leading position in the mobile voice services market, with a market share of 35.9% based on this indicator. Measured by retail revenue from the provision of the service, Yettel once again held the largest market share (38.6%), followed by Vivacom (34.2%) and A1 (27.2%).

Table 5

Market shares of undertakings providing retail mobile voice service

Undertaking	2024		2025	
	Share based on number of subscribers	Share based on revenue	Share based on number of subscribers	Share based on revenue
A1 BULGARIA EAD	36.5%	27.1%	35.9%	27.2%
VIVACOM BULGARIA EAD	32.8%	32.0%	33.1%	34.2%
YETTEL BULGARIA EAD	30.7%	40.9%	31.0%	38.6%

Source: Data submitted to CRC

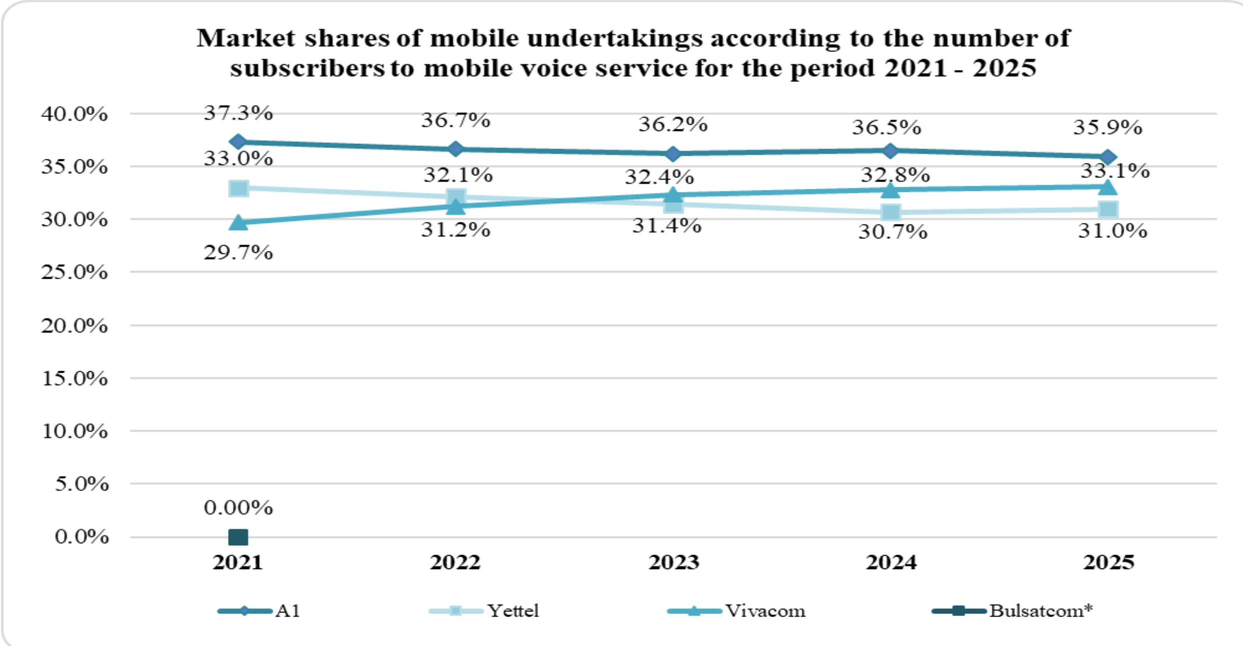
The market share data for 2025, measured both by the number of subscribers and by retail revenue from the provision of mobile voice services, show that Vivacom increased its market share under both indicators compared with 2024. However, the increase was not sufficient to alter the ranking of the operators within the market segment.

In 2025, compared with 2024, the specific values of the changes in the market shares of A1, Vivacom, and Yettel were as follows:

- the relative share of A1, calculated on the basis of number of subscribers, fell by 0.6 percentage points, while the one calculated on the basis of revenue grew by 0.1 percentage points;
- the relative share of Vivacom, calculated on the basis of number of subscribers, grew by 0.3 percentage points, while the one calculated on the basis of revenue was up by 2.2 percentage points.
- the relative share of Yettel, calculated on the basis of number of subscribers, grew by 0.3 percentage points, while the one calculated on the basis of revenue fell by 2.3 percentage points.

The trend of development of the market shares of mobile undertakings over the last five years (2021 – 2025), calculated on the basis of the number of subscribers and revenue from the provision of mobile voice service, is presented in Figures 10 and 11 below.

[15] Market shares were calculated based on revenue from the provision of retail mobile voice service (revenue from retail service provided standalone and the part of revenue provided bundled with other electronic communication services).



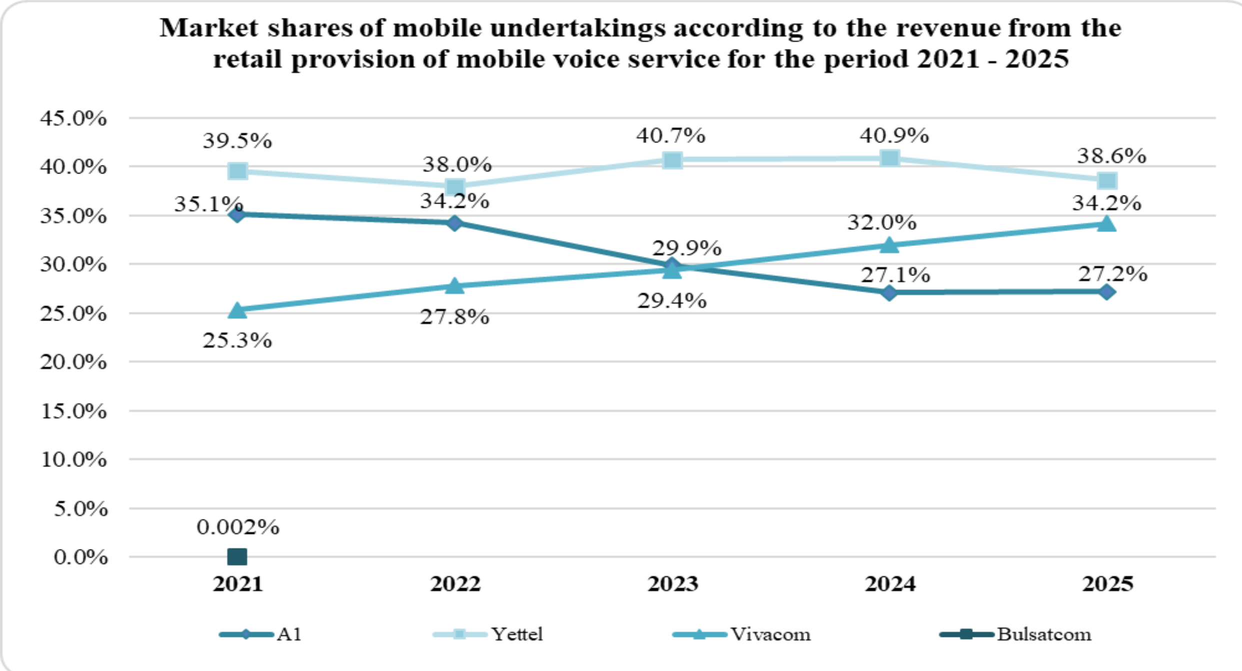
*The undertaking provided mobile voice service until 15.12.2021.

Source: Data submitted to CRC

Figure 10

Figure 10 shows that, overall, A1's market share, measured by the number of subscribers, declined over the period 2021–2025. In 2025, the undertaking's market share was 1.4 percentage points lower than in 2021. Over the same period, Vivacom's market share increased every year, reaching a level in 2025 that was 3.4 percentage points higher than in 2021. By contrast, Yettel's market share decreased by 2.0 percentage points over the period, falling from 33.0% in 2021 to 31.0% at the end of 2025.

As shown in Figure 11 below, Vivacom exerted competitive pressure on both A1 and Yettel throughout the five-year period. As a result, it expanded its market share each year, and by the end of 2025 its market share, measured by retail revenue, was 8.9 percentage points higher than in 2021. Over the same period, both A1 and Yettel recorded declines in this indicator, of 7.9 and 0.9 percentage points, respectively. The significant decline in A1's market share in 2023 resulted in a change in the ranking of operators within the market segment, with Vivacom overtaking A1 to become second, moving A1 into third place. Overall, Figure 11 shows that Yettel's market share fluctuated over the period; however, the undertaking successfully withstood the competitive pressure exerted by Vivacom. Throughout the entire five-year period (2021–2025), Yettel maintained the largest market share, measured by retail revenue.



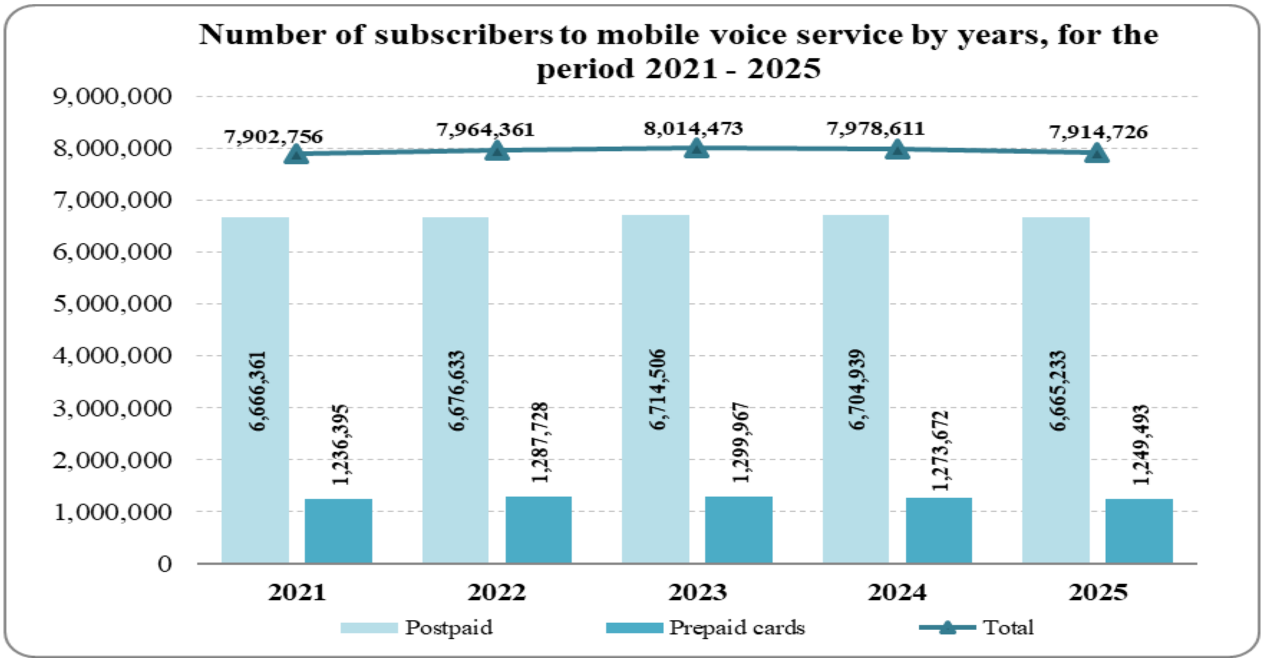
Source: Data submitted to CRC

Figure 11

The trends in the market shares of the three mobile operators, measured both by the number of subscribers and by retail revenue, show that despite the oligopolistic structure of the mobile voice services market, effective competition existed among market participants throughout the period 2021–2025. As a result, Vivacom, the most recent entrant to the market, gradually increased its market shares and exerted competitive pressure on the other operators.

Subscribers to mobile voice service

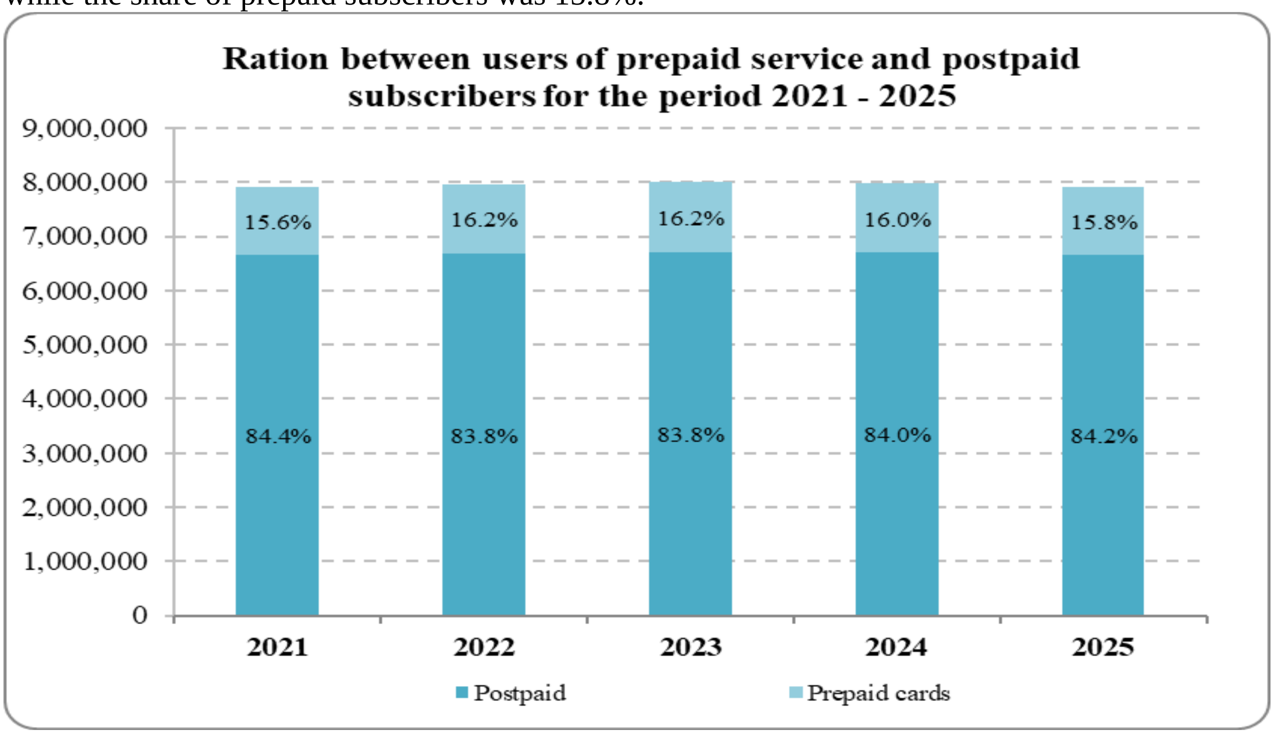
As of 31.12.2025, the number of mobile voice service subscribers in Bulgaria (measured by the number of unique SIM cards) was 7,914,726. Compared with 2024, this number decreased by 0.8%. As shown in Figure 12, compared with the end of 2024, both the number of postpaid subscribers (down by 0.6%) and the number of end-users of prepaid services (down by 1.9%) declined. To compare with, in 2024, the decline registered in postpaid subscribers was by 0.1%, and by 2.0% for those with prepaid cards.



Source: Data submitted to CRC

Figure 12

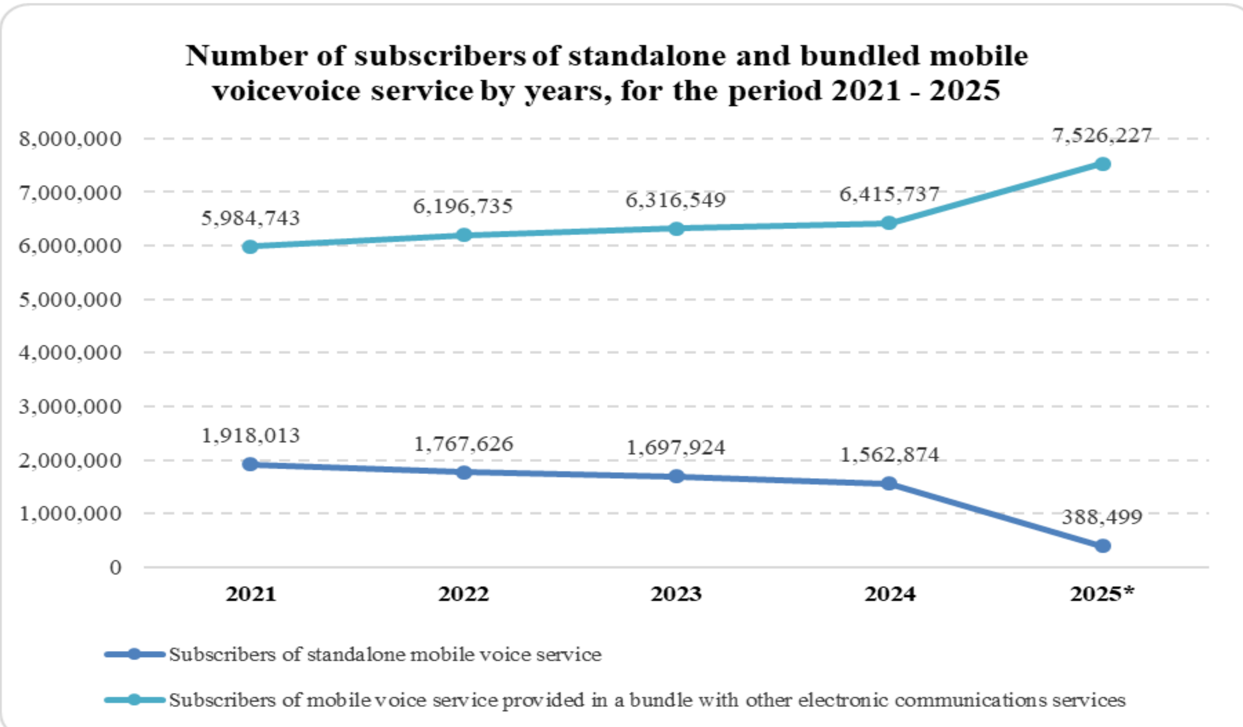
As shown in Figure 13, there was no significant change in the proportion of prepaid and postpaid mobile voice service subscribers in 2025. As of 31.12.2025, the share of postpaid subscribers stood at 84.2%, an increase of 0.2 percentage points compared with the end of 2024, while the share of prepaid subscribers was 15.8%.



Source: Data submitted to CRC

Figure 13

As of 31.12.2025, the number of subscribers using mobile voice services as part of a bundle with other electronic communications services amounted to 7,526,227, representing a significant increase of 17.3% compared with the end of 2024. This increase is primarily attributable to the change in the definition of bundled services introduced in 2025 (related information is provided in section 1.2.1 “Bundled Services” of the Annual Report). Under the revised definition, the number of subscribers using mobile voice services in a bundle with other electronic communications services as of 31.12.2025 included both postpaid subscribers and prepaid subscribers (until 2025, the definition covered only postpaid subscribers). The methodological change in the definition of bundled services also resulted in a significant decrease in the number of subscribers using mobile voice services on a standalone basis, outside a bundle with other electronic communications services, by the end of 2025 (Figure 14). The share of these subscribers in the total number of mobile voice service subscribers at the end of 2025 fell to as little as 4.9%.



** The number of bundled mobile voice service subscribers for 2025 includes both postpaid subscribers and prepaid subscribers. The data for previous years include only postpaid subscribers.*

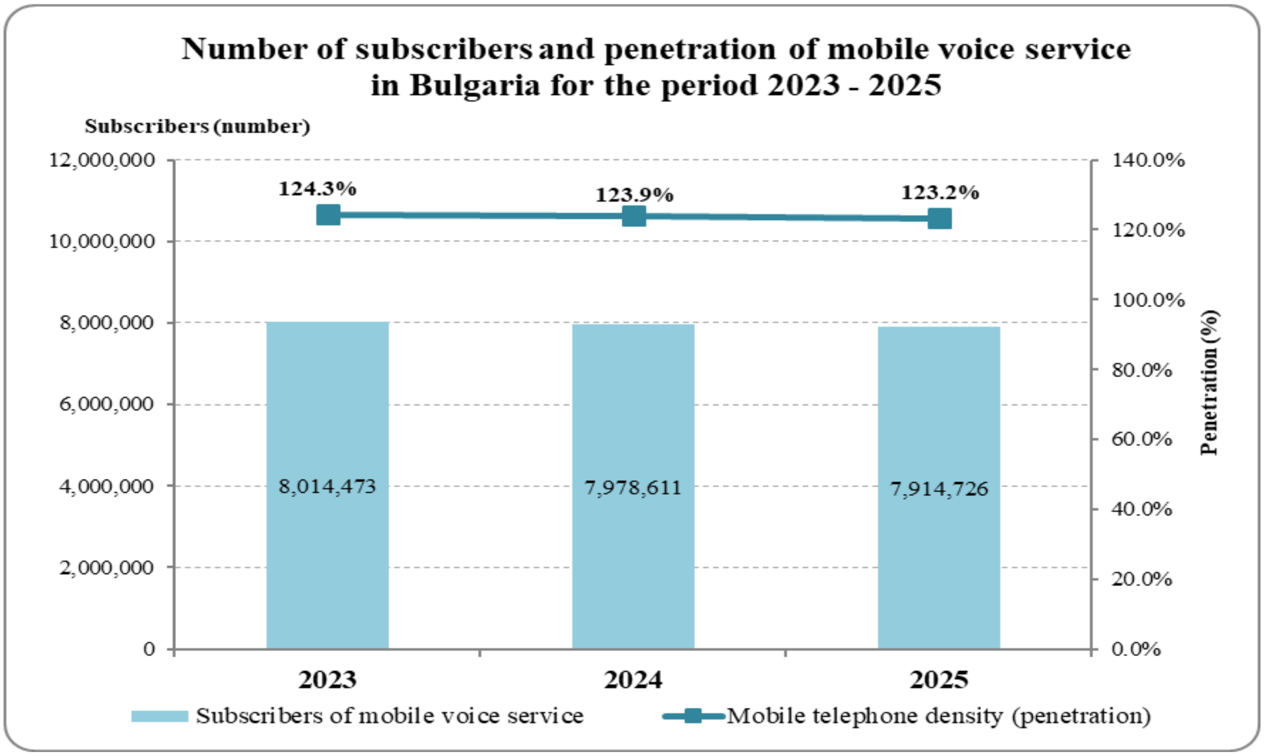
Source: Data submitted to CRC

Figure 14

The penetration rate of mobile voice services among the population amounted to 123.2%[16] by the end of 2025 (Figure 15), representing a decrease of 0.7 percentage points compared with the value of the indicator in 2024 (123.9%). These data show that the rate of decline in the penetration of mobile voice services among the population accelerated in 2025 compared with 2024 (in 2024, the indicator decreased by 0.4 percentage points). This acceleration is attributable

[16] The indicator was calculated as the ratio between the number of subscribers to mobile voice service as of 31 December of the respective year and the number of population according to NSI data as of the same date (https://www.nsi.bg/bg/content/2975/население-по-области-общини-местоживеене-и-пол).

to the fact that the decrease in the number of mobile voice service subscribers as of 31.12.2025 compared with the previous year (0.8%) was greater than the decrease in the population over the same period (0.2%).



Source: Data submitted to CRC

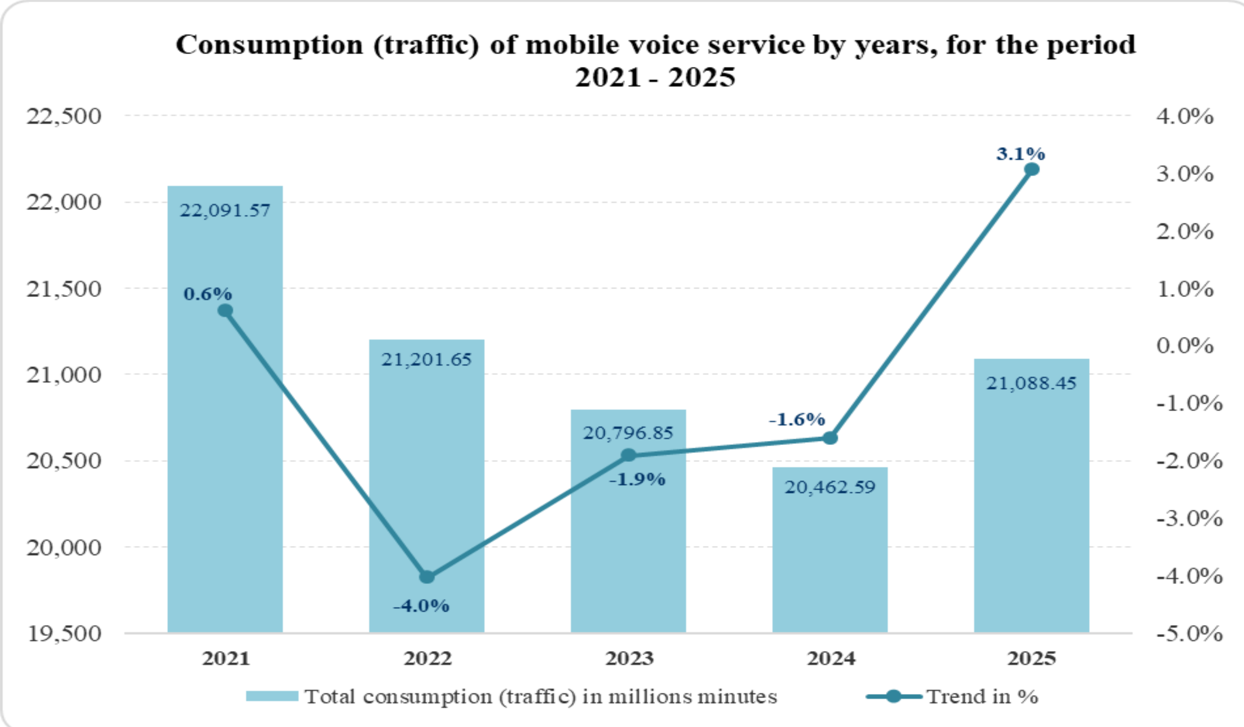
Figure 15

The lower demand for and consumption of mobile voice services in recent years, together with the fact that the service has reached its maturity stage, indicate that the penetration rate of the service among the population is unlikely to change significantly in the coming years.

Consumption (traffic) of mobile voice service

The total volume of outgoing traffic from domestic mobile networks[17] in 2025 amounted to 21,088.45 million minutes, representing an increase of 3.1% compared with the volume reported for 2024. As shown in Figure 16 below, this increase in mobile voice service consumption in 2025 interrupted the three-year downward trend in the indicator observed over the period 2022–2024. However, it did not reach the peak level of consumption recorded in 2021, which resulted from the COVID-19 health crisis.

[17] Including outgoing traffic generated by mobile voice service subscribers within a mobile network (on-net traffic), to other mobile networks in the country (off-net traffic), to fixed networks in the country, and to networks abroad.



Source: Data submitted to CRC

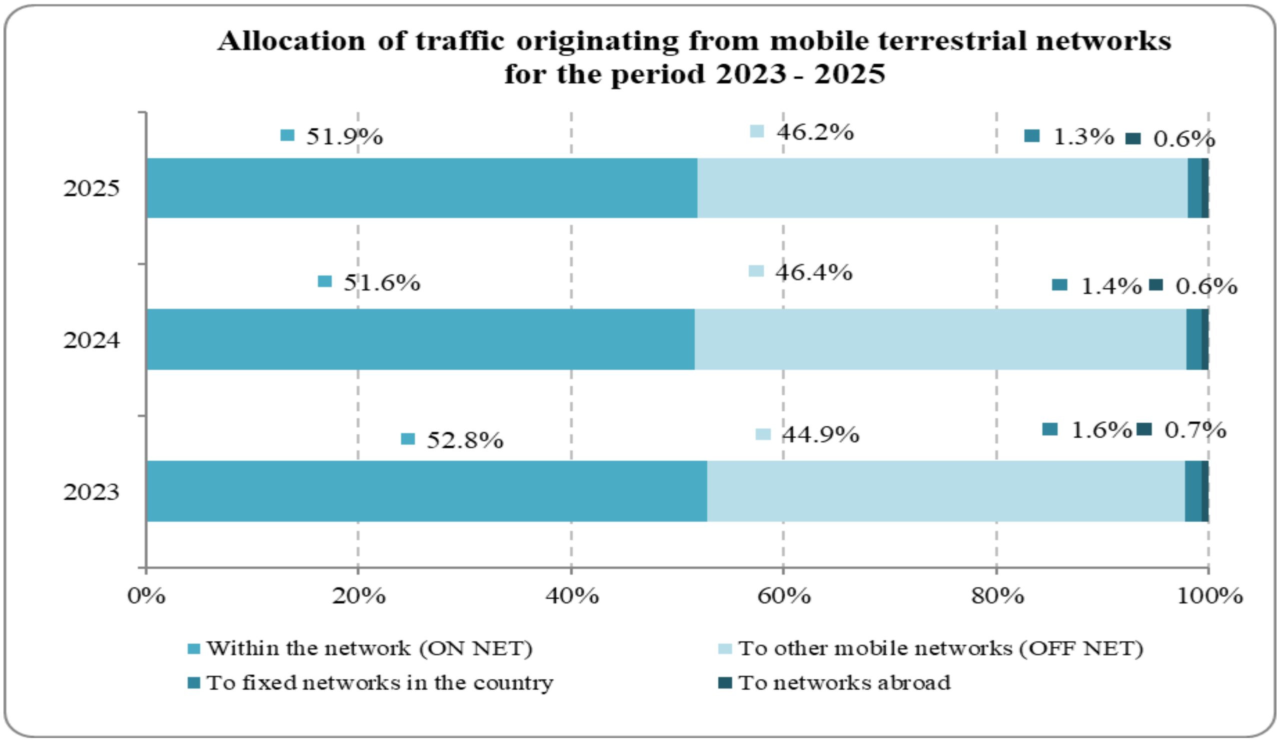
Figure 16

The growth in mobile voice service consumption in 2025 was driven by the higher volume of minutes used within the own mobile network (up by 3.6%), as well as by growth in calls to other mobile networks in the country (up by 2.7%) and to networks abroad (up by 0.4%). A decline compared with the previous year (2024) was observed only in traffic from mobile networks to other fixed networks in the country, which decreased by 5.7%. The analysis by undertaking shows that the volume of outgoing traffic from mobile networks increased in 2025 compared with 2024 for Vivacom (by 8.8%) and A1 (by 2.7%), while Yettel recorded a decline in subscriber consumption (by 1.6%).

In 2025, the downward trend in roaming service consumption intensified, with the volume of outgoing roaming calls made abroad by subscribers of Bulgarian mobile operators decreasing by 11.4% compared with 2024. This represents a decline that is 8.2 percentage points higher than the decrease recorded in 2024 (3.2%). For incoming roaming calls, the rate of decline also accelerated: following a decrease of 5.2% in 2024, the decline reached 14.3% in 2025.

In 2025, postpaid subscribers and prepaid SIM card users accounted for 96.9% and 3.1%, respectively, of total mobile voice service consumption (measured by the number of minutes used). These data show that the changes in the respective shares compared with 2024 were insignificant, with the share of traffic generated by postpaid subscribers increasing only 0.1 percentage points. In 2025, the volume of minutes used by postpaid subscribers increased by 3.2% compared with 2024, while traffic generated by prepaid SIM card users decreased by 0.6%. For comparison, in 2024 postpaid subscribers recorded a decline of 1.6%, while the decline among prepaid SIM card users amounted to 2.9%.

The breakdown of outgoing traffic from mobile networks in 2025 (Figure 17) shows that the share of off-net traffic decreased by 0.2 percentage points compared with 2024 (from 46.4% in 2024 to 46.2% in 2025), while the share of on-net traffic increased by 0.3 percentage points (from 51.6% in 2024 to 51.9% in 2025). These changes in the shares of off-net and on-net traffic were insignificant and were attributable to the fact that the increase in on-net calls (3.6%) was greater than the increase in off-net calls (2.7%).



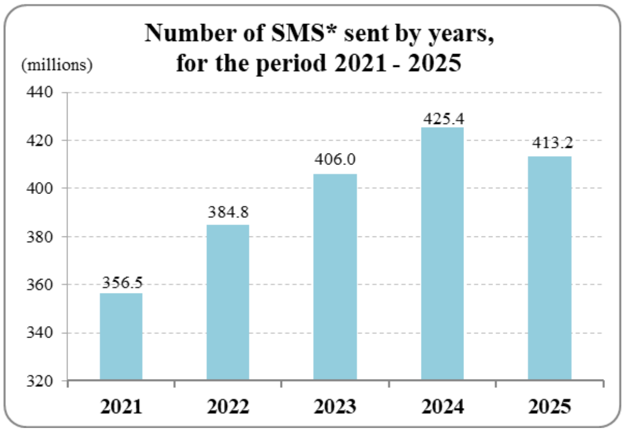
Source: Data submitted to CRC

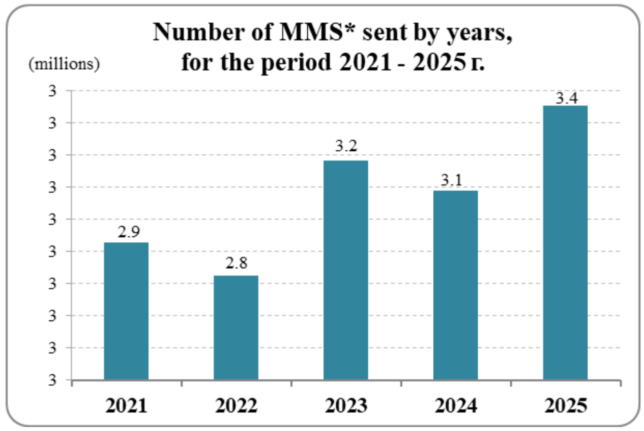
Figure 17

Figure 17 also shows that the share of traffic to fixed networks in the country (1.3%) decreased insignificantly compared with 2024 (by 0.1 percentage points), while the share of traffic to networks abroad remained unchanged (0.6%).

Short multimedia and text messages

Unlike in 2024, when an increase of 4.8% was registered, the total number of SMS messages sent by Bulgarian subscribers to domestic and international networks and to short numbers declined by 2.9% in 2025, falling to 413.2 million (Figure 18). The total number of MMS messages, by contrast, increased by 8.5%, reaching 3.4 million in 2025 (Figure 19).





**Sent to networks in the country and abroad and to short numbers*

Source: Data submitted to CRC

Figure 18

Source: Data submitted to CRC

Figure 19

The decline in the number of SMS messages recorded in 2025 was attributable to a decrease in the number of SMS messages sent both to short numbers (by 3.4%) and to domestic (by 2.0%) and international networks (by 7.4%). The use of SMS messages by subscribers while roaming also declined in 2025, by 28.3%. In this context, it should be noted that SMS is a technology developed for a world without Internet access and has gradually lost its relevance as a result of technological developments in recent years and the changing way in which people communicate in the digital environment, increasingly relying on more advanced and feature-rich communication applications such as Viber, Messenger and WhatsApp. These applications offer significantly greater functionality than SMS, including the ability to send photos, videos and voice messages, make video calls, and create group chats. As a result, they are more convenient and are increasingly preferred by users over SMS. In addition, the way businesses and public institutions use SMS has also been evolving. Although SMS remains an important channel for delivering verification codes, banking notifications and other official messages, many organisations are increasingly relying on mobile applications, push notifications and other digital communication channels. As a result, the role of SMS as a universal communication tool has gradually diminished, and its use is becoming increasingly limited to specific functionalities.

Revenue from mobile voice service

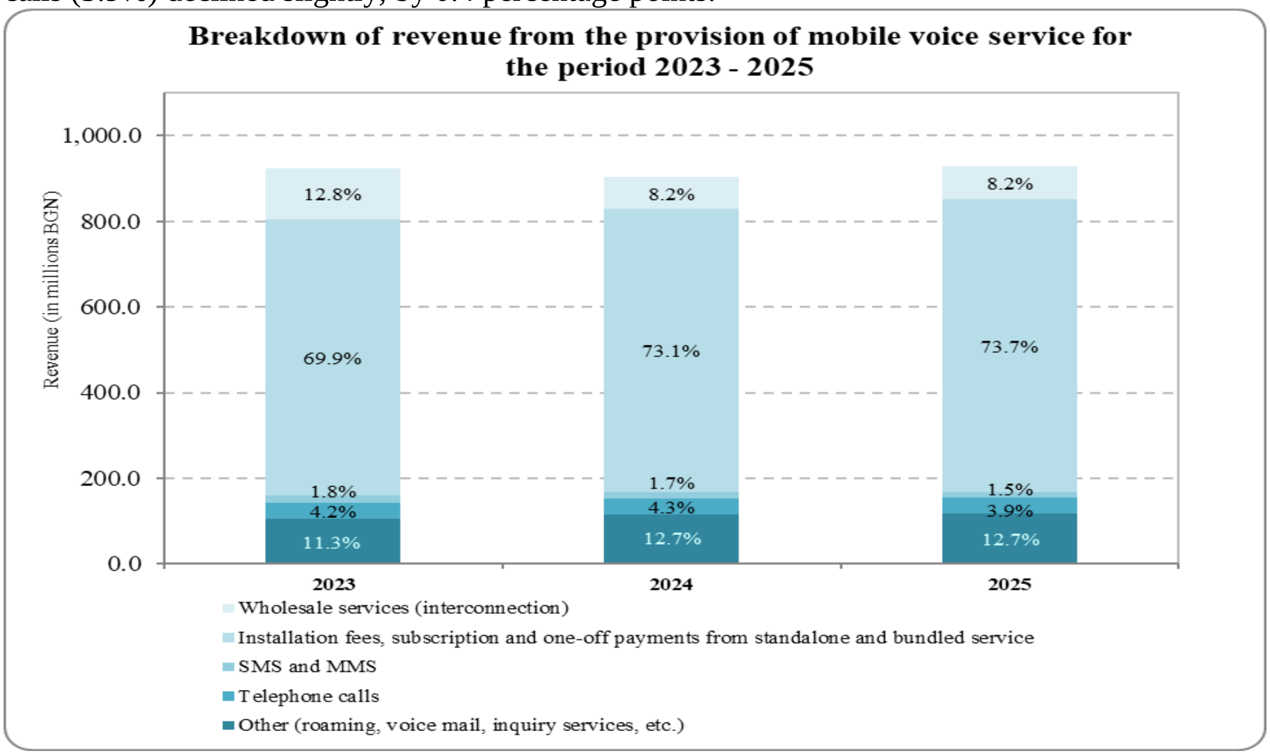
In 2025, the total volume of revenue from the provision of mobile voice service amounted to BGN 928.060 million, registering growth of 2.9% compared with 2024. To compare with, the decline in revenue registered in 2024 was 2.2%. The analysis of the total volume of revenue from mobile voice service shows that, in 2025, revenue from the retail provision of mobile voice service (both standalone and in a bundle) rose for a second consecutive year by 2.9% to arrive at BGN 852.130 million. Wholesale service revenue amounted to BGN 75.929 million in 2025, representing an increase of 2.4% compared with 2024. This growth was driven by an increase in both wholesale non-traffic service revenue (up by 1.9%) and wholesale traffic service revenue (up by 2.5%).

The increase in retail revenue from the provision of mobile voice services recorded in 2025 was attributable both to higher revenue from the provision of the service as part of a bundle with other electronic communications services (up by 2.5%) and to growth in revenue from retail non-traffic and traffic services (up by 13.6% and 0.2%, respectively).

For the second consecutive year, retail revenue generated from business subscribers (traffic and non-traffic revenue from the standalone provision of mobile voice services) declined. The decrease was significantly larger in 2025, amounting to 9.4%, compared with a decline of 1.4% in 2024. The analysis by undertaking shows that all three mobile operators recorded a decline in this revenue from business subscribers in 2025, with the largest decrease reported by Vivacom.

With regard to revenue from the provision of bundled mobile voice services (monthly subscription fees and installation fees), A1 and Vivacom recorded growth in 2025, while Yettel reported a decline.

As shown in Figure 20 below, the increase in total revenue recorded in 2025 did not result in any change in its structure compared with previous years (breakdown of their shares). Revenue from monthly subscription and installation fees for the standalone and bundled provision of mobile voice services continued to account for the largest share (73.7%) and, for another consecutive year, increased by 0.6 percentage points compared with 2024. The share of wholesale service revenue remained unchanged at 8.2% compared with 2024, while the share of revenue from mobile voice calls (3.9%) declined slightly, by 0.4 percentage points.



Source: Data submitted to CRC

Figure 20

For another consecutive year, the share of revenue from SMS and MMS services declined (by 0.2 percentage points), while the share of revenue from other services remained unchanged at 12.7% compared with 2024.

Summary

In 2025, the market for mobile voice service in Bulgaria remained stable, with a slight decrease in the number of subscribers and penetration of the service among the population, as well as a small increase in revenue and consumption of the service. Overall, the trend in these indicators in recent years shows that this market has passed its maturity phase and has limited growth potential. The market is gradually evolving, with voice services increasingly becoming a complementary component of mobile data and digital services. At the same time, Vivacom, the most recent entrant to the mobile voice services market, has for another consecutive year continued to exert competitive pressure on A1 and Yettel, successfully expanding its market shares both in terms of number of subscribers and revenues.

3. Leased lines services

In 2025, the “leased lines” segment, comprising retail leased lines services, including international leased lines and wholesale leased lines, registered growth in terms of generated revenue while the number of leased lines declined. The total revenue from the provision of the service in 2025 registered growth of 0.3% to reach BGN 29.021 million. In absolute terms, this is an increase of BGN 80,659 compared with the revenue reported in the previous year 2024.[18]

Table 6 below presents a summary of the number of undertakings providing the "leased lines” service, the number of leased lines and the amount of revenue generated from them during the reporting period.

Table 6

Number of undertakings, number of lines and revenues by type of leased lines provided in 2025

Name of service	Number of undertakings that provided the service in 2025	Number of leased lines as of 31.12.2025	Revenue in 2025 (million BGN, excluding VAT)
1. Wholesale leased lines	**17**	**2,491**	**23.683**
1.1. National leased lines	17	2,092	16.801
1.2. International leased lines	7	399	6.882
2. Retail leased lines	**12**	**1,762**	**5.339**
Total	**23**	///	**29.021**

Source: Data submitted to CRC

In 2025, compared with 2024, an increase was reported in absolute terms in revenue from retail leased lines by 11.8%, while revenue from wholesale leased lines was down by nearly 2.0% versus 2024.

[18] The data for 2024 have been updated as a result of additional information received.

Market players

In 2025, the active undertakings in the segment under consideration were 23 (the undertakings registered as of 31.12.2025 in the Register of CRC that had declared their intention to provide the “leased lines” service, were 121). Six undertakings provided the service both in the retail and in the wholesale market, while seven undertakings provided the “international leased lines” service.

Tables 7 and 8 present the market shares of the three leading undertakings in the retail/wholesale leased lines segment in 2025 based on the number of lines leased by them.

Table 7

Market shares of undertakings providing retail leased lines

Undertaking	2024		2025	
	Share based on number of retail leased lines	**Share based on retail revenue**	**Share based on number of retail leased lines**	**Share based on retail revenue**
VIVACOM BULGARIA EAD	71.4%	47.2%	71.9%	43.1%
A1 BULGARIA EAD	10.0%	18.1%	11.0%	18.8%
NETERRA EOOD	10.4%	8.4%	8.0%	14.4%
All other	8.2%	26.3%	9.1%	23.7%

Source: Data submitted to CRC

It is apparent from the data in the table above that in 2025 the two leading undertakings based on market share calculated on the basis of the number of retail leased lines, were Vivacom and A1, as A1 replaced
NETERRA EOOD (Neterra) from the second position on the basis of the reported data in 2024. The total market share (90.9%) on the basis of the number of retail lines of the three main undertakings decreased by 0.9 percentage points, which is mainly due to the decrease of 2.4 percentage points in the market share of Neterra, which is not compensated by the increased market shares of Vivacom and A1 – by 0.5 and by 1.0 percentage points, respectively.

The share of the leading undertaking, Vivacom, calculated based on revenue from retail leased lines, fell in 2025 by 4.1 percentage points compared with 2024. The market share of all other undertakings, calculated based on revenue, registered a decline to reach 23.7% (by 2.6 percentage points less than in 2024).

Table 8

Market shares of undertakings providing wholesale leased lines

Undertaking	2024		2025	
	Share based on number of wholesale leased lines	**Share based on wholesale revenue**	**Share based on number of wholesale leased lines**	**Share based on wholesale revenue**
NOVATEL EOOD	20.6%	24.8%	21.9%	21.9%
NETERRA EOOD	25.9%	33.3%	22.1%	30.5%
VIVACOM BULGARIA EAD	15.0%	18.1%	16.0%	20.1%
All other	38.5%	23.8%	40.0%	27.5%

Source: Data submitted to CRC

In 2025, there was no shift in the positions of the three undertakings by the number of wholesale leased lines provided. Their total market share, calculated on the basis of number of lines, made up 60%, which is a decrease of 1.5 percentage points.

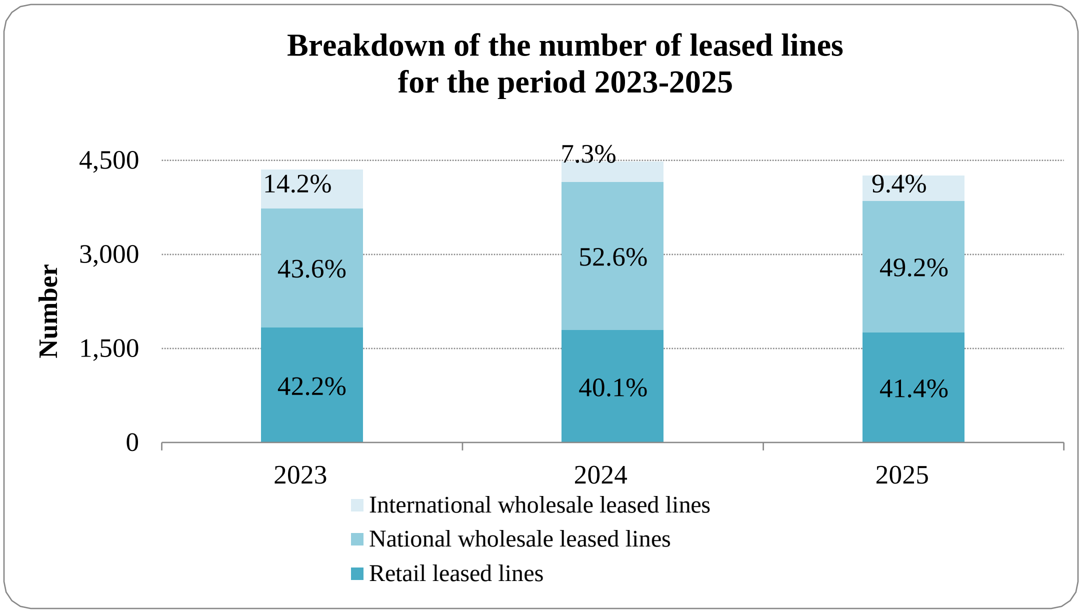
On the basis of revenue, a decline of 3.7 percentage points was recorded compared with 2024.[19] Neterra's market share, measured by wholesale revenue, decreased by 2.8 percentage points compared with the previous year. NOVATEL EOOD also recorded a decline in its revenue-based market share, by 2.9 percentage points. By contrast, this indicator for the other leading undertaking, Vivacom, increased by 2.0 percentage points.

Neterra's market share based on the number of wholesale leased lines declined by 3.9 percentage points, unlike the other participants in the segment, all of which recorded an increase in this indicator.

Number of wholesale and retail leased lines

Figure 21 presents the relative shares of the different types of leased lines, calculated on the basis of the number of leased lines reported by undertakings for 2025. The data show that the share of retail leased lines increased by 2.1 percentage points during the reporting year, reaching 41.4%. The relative share of international wholesale leased lines also increased, by 2.1 percentage points compared with the previous year, to arrive at 9.4%. Although national wholesale leased lines continued to account for the largest share of the total number of leased lines (49.2%), their share declined by 3.4 percentage points.

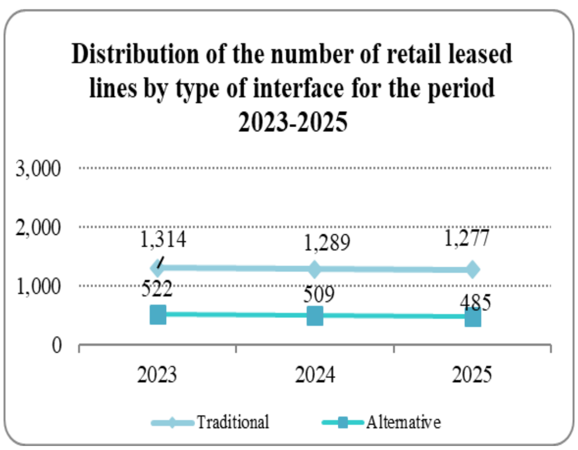
[19] The data for 2024 have been updated as a result of additional information received.



Source: Data submitted to CRC

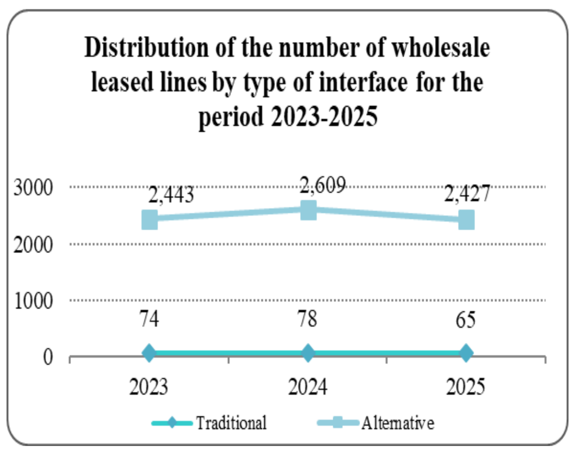
Figure 21

Figures 22 and 23 present the distribution of the number of wholesale and retail leased lines provided for the period 2023–2025 by type of interface used.



Source: Data submitted to CRC

Figure 22



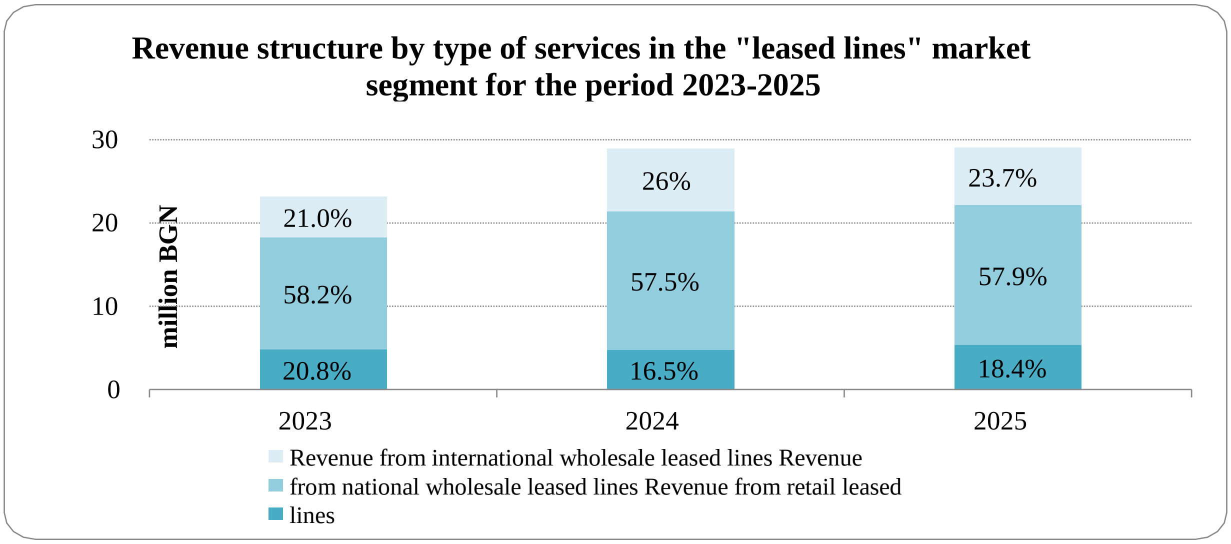
Source: Data submitted to CRC

Figure 23

In 2025, the trend of the last two reporting periods in the retail leased lines continued – the number of traditional lines decreased by 0.9% and arrived at 1,277. Alternative retail leased lines also saw a 4.7% drop. Alternative and traditional wholesale lines showed a downward trend in 2025, with a reported decrease of 16.7% and 7%, respectively.

Revenue from leased lines

Figure 24 presents the structure of revenue generated from the provision of leased lines services (wholesale and retail) for the period 2023-2025.



Source: Data submitted to CRC

Figure 24

The generated revenue, as declared by the undertakings providing the “leased lines” service in 2025, grew by as little as 0.3% compared with 2024.[20] In 2025, the relative share of revenue from national wholesale leased lines rose by 0.4 percentage points and remained with the highest relative share (57.9%) in the total revenue.

The significant increase in the total retail leased line revenue recorded in 2025 compared with 2024 was primarily attributable to Neterra and A1. Neterra's revenue from national retail leased lines increased by 51.9%, while A1 recorded an increase of 13.6%.

Revenue from alternative retail leased lines grew significantly, by 24.7% compared with 2024, whereas revenue from traditional wholesale leased lines declined substantially, by 28.0%.

Summary

In 2025, the leased lines services segment registered as follows:

- a change in the number of undertakings providing the “leased lines” service, with the number of undertakings providing the “leased lines” service up by one compared with the previous reporting year;
- a slight decrease in wholesale revenue and a significant increase in retail revenue;

[20] The data for 2024 have been updated as a result of additional information received.

- a slight decrease in the number of retail leased lines and a significant decrease in wholesale lines;
- a decrease in the number of alternative leased lines by 1.8 percentage points and a drop in the number of traditional leased lines by 6.7 percentage points;
- a significant increase in revenue generated from retail leased lines by NETERRA EOOD;
- an insignificant increase in revenue from national wholesale leased lines of NETERRA EOOD and a decrease in revenue from international wholesale leased lines;
- a significant increase in revenue for alternative retail leased lines;
- a substantial decrease in revenue for traditional wholesale leased lines.

4. Data transmission and Internet access

Data transmission and Internet access services in the country continued their upward trend in 2025. Total revenue generated from the services included in the "Data transmission and Internet access" market segment amounted to BGN 2,376.325 million, representing an increase of 9.1% compared with 2024.[21]

Table 9 presents information on the number of undertakings which provided services in this market segment in 2025, the revenue generated by them and the number of their subscribers/users.

[21] The data for 2024 have been updated. The revenue from the segment for 2024 amounted to BGN 2,178.318 million.

Table 9

Number of undertakings, subscribers/users and revenues by type of Internet access and data transmission services provided in 2025

Name of service	Number of undertakings that provided the service in 2025	Number of subscribers/ users as of 31.12.2025		Revenue (in million BGN, excluding VAT)	
		Total[1]	incl. subscribers to bundled services	Total[2]	incl. revenue from bundled services
1. Retail Internet access and data transmission services	**604**	///	///	**2,051.059**	**1,430.017**
1.1. Internet access, including:	595	11,216,457	8,179,197	1,988.599	1,430.017
1.1.1. Fixed	595	2,771,900	951,402	500.779	142.576
1.1.2. Mobile[3]	3	8,451,467	7,234,705	1,487.820	1,287.440
1.2. Data transmission services	55	1,279,383	///	59.868	///
1.3. Other services (hosting, e-mail, etc.)	20	52,437	///	2.592	///
2. Wholesale services	**137**	///	///	**325.266**	///
2.1. Provision of Internet connectivity capacity (Peering and Transit)	91	800	///	24.311	///
2.2. Data transmission services	30	497	///	23.080	///
2.3. Provision of wholesale access to the Internet via NGA networks	50	269	///	4.731	///
2.4. Other wholesale services	11	40	///	273.144	///
Total	**650**	///	///	**2,376.325**	///

[1] Including subscribers to bundled services.

[2] Including revenue from bundled services.

[3] Including mobile access via data cards, incl. prepaid cards or modem and bundled services with mobile Internet access included (including subscribers to data transmission packages purchased in addition to voice plans via 3G, 4G and 5G UMTS/HSPA+/LTE+/NR (5G) mobile networks).

Note: *The symbol /// used in this document means that the information is not applicable to the indicated parameter or is confidential.*

Source: Data submitted to CRC

Market players

The number of undertakings providing services for Internet access and data transmission in 2025 was 650[22] down by 24 undertakings compared with 2024. The lower number of undertakings is mainly due to the reduced number of undertakings providing retail services in 2025, which was by 23 less than in 2024, falling to 604. The number of undertakings providing

[22] Including undertakings that notified CRC for suspension of their activity in 2025 and declared revenue during the year.

wholesale services decreased by five over the one-year period, as in 2025, wholesale services were provided by 137 undertakings.

The three leading providers of fixed Internet access services to end-users (retail services) retained their positions in 2025 from the previous year.

Table 10

Market shares of undertakings providing fixed Internet access at retail level

Undertaking	2024		2025	
	Share based on the number of subscribers to fixed access[1]	Share based on revenue from fixed access [2]	Share based on the number of subscribers to fixed access[1]	Share based on revenue from fixed access [2]
VIVACOM BULGARIA EAD	39.4%	37.1%	37.4%	32.4%
A1 BULGARIA EAD	29.9%	23.6%	31.7%	27.3%
YETTEL BULGARIA EAD	4.1%	3.4%	5.1%	5.0%
All other	26.6%	35.8%	25.8%	35.3%

[1] Including subscribers to bundled services.

[2] Including revenue from bundled services.

Source: Data submitted to CRC

Although it registered a decline compared with 2024, Vivacom retained its leading position, with shares of 37.4% based on the number of fixed Internet access subscribers and 32.4% based on revenue from fixed Internet access services. Its subscriber-based share decreased by 2.0 percentage points, while its revenue-based share declined by 4.7 percentage points. A1, in turn, recorded an increase of 1.8 percentage points in its subscriber-based share and 3.6 percentage points in its revenue-based share, once again ranking second with shares of 31.7% and 27.3%, respectively. Yettel also retained its third position in 2025, with market shares of 5.1% based on number of subscribers and 5.0% based on revenue from fixed Internet access services, up by 1.1 and 1.6 percentage points, respectively. The remaining undertakings reported a slight decline in both indicators, with the share based on the number of subscribers falling by 0.8 percentage points, and that based on revenue down by 0.5 percentage points over a one-year period. In 2025, the share of undertakings other than the three market leaders, measured by number of subscribers, amounted to 25.8%, while their combined share of total revenue was 35.3%.

In 2025, mobile Internet access services continued to be provided by three undertakings: A1, Vivacom, and Yettel. Table 8 presents their market shares, measured by number of subscribers and by revenue from mobile Internet access services, for 2024 and 2025.

Table 11

Market shares of undertakings providing retail mobile Internet access

Undertaking	2024		2025	
	Share based on the number of subscribers to mobile access[1]	Share based on revenue from mobile access [2]	Share based on the number of subscribers to mobile access[1]	Share based on revenue from mobile access [2]
VIVACOM BULGARIA	36.7%	28.2%	36.3%	28.7%
A1 BULGARIA	33.4%	42.1%	33.9%	42.1%
YETTEL BULGARIA	29.9%	29.7%	29.8%	29.3%

[1] Including subscribers to standalone service via data cards or modem, and bundled service subscribers, including a certain amount of data traffic at maximum speed and/or volume of data traffic per month.

[2] Including revenue from standalone service via data cards or modem, revenue from traffic, and the part of revenue from the provision of mobile Internet in a bundle with other electronic communications services.

Source: Data submitted to CRC

As is evident from the data presented in the table, in 2025, there was no change in the positions of undertakings providing mobile Internet access at retail level compared with the previous year. The market share on the basis of the number of subscribers remained almost unchanged for all three undertakings compared with 2024, with a slight decrease for Vivacom and Yettel by 0.4 and 0.1 percentage points respectively, while the share of A1 grew by 0.5 percentage points. Market shares calculated on the basis of revenue from the provision of mobile Internet access did not register any changes in the positions as well. In 2025, Vivacom recorded a slight increase in its market share of 0.4 percentage points, reaching 28.7%. A1 continued to hold the largest revenue-based market share, at 42.1%, which remained unchanged compared with 2024, while Yettel's market share declined slightly over the one-year period, by 0.4 percentage points, to 29.3%.

Subscribers to Internet access services

The upward trend in the number of Internet access subscribers in Bulgaria continued in 2025. As of 31.12.2025, the total number of retail Internet service subscribers (fixed and mobile Internet access combined) reached 11.216 million, representing an increase of 13.0%, with the recorded growth significantly exceeding that of the previous year. The upward trend in the number of subscribers to bundled services (including fixed and/or mobile Internet access) also continued. In 2025, the number of bundled service subscribers rose by 17.4% in absolute terms, reaching 8.179 million. The substantial increase in the total number of subscribers was largely driven by the growth in the number of mobile Internet access subscribers, which, in turn, reflected the increasing number of subscribers to bundled services. The increase in the number of bundled service subscribers was also attributable to the change in the definition of a bundled service introduced in 2025, under which the number of subscribers using mobile Internet access as part of a bundle with other electronic communications services, as of 31.12.2025, includes both postpaid subscribers and prepaid SIM card users. In 2025, bundled service subscribers accounted for 72.9% of the total number of subscribers.[23] The total number of fixed Internet access subscribers (including those receiving the service as part of a bundled offering) increased by 4.9%, a rate broadly comparable to that recorded in the previous year, reaching 2.772 million by the end of 2025. Alongside the growth in the total number of subscribers, the number of subscribers receiving fixed Internet access as part of a bundled service also increased, by 9.5%. The share of fixed access subscribers in the total number of Internet access subscribers registered a decrease of 1.9 percentage points compared with the previous year to reach 24.7%.

In 2025, the total number of subscribers using mobile Internet access services[24] reached 8.451 million, with growth of 15.9% compared with the previous year. The number of mobile Internet access subscribers also grew by 18.5% to arrive at 7.235 million by the end of 2025. Unlike the previous year when a 0.1% decline was reported, in 2025, there was an increase of 2.4% in the number of subscribers using the service standalone (via data cards and/or modem) and these subscribers already reach 1.217 million. The share of subscribers to mobile Internet access via LTE in the total number of subscribers to mobile Internet access was 45.5%, down by 9.2 percentage points in 2025. This decline is mainly due to the increase in 5G subscriptions, which also affects their share in the total number of subscribers to mobile Internet access, which in 2025 amounted to 37.5% and grew by 4.2 percentage points. As of 31.12.2025, the total number of 5G subscriptions in Bulgaria amounted to 3.169 million.

Figure 25 presents penetration of fixed broadband Internet access by population[25] and by households[26] as well as of mobile access[27] by population for the period 2023-2025.

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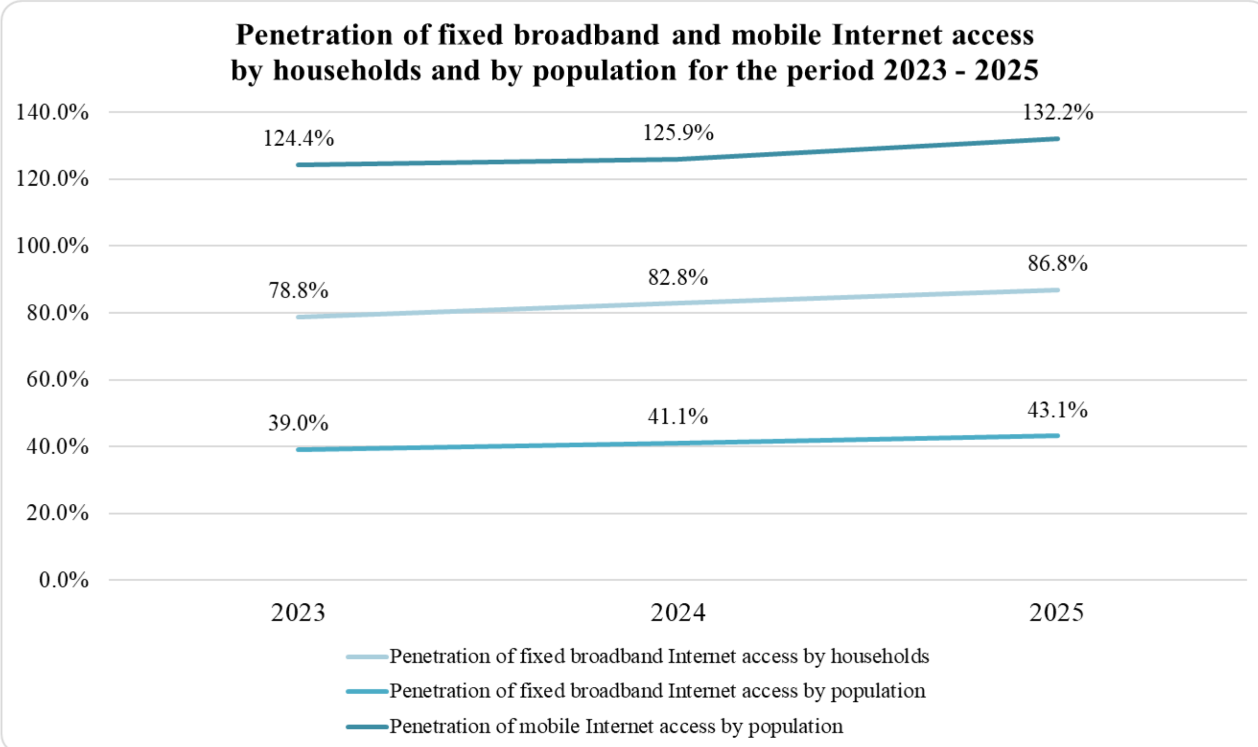
[23] In order to avoid duplication, subscribers to bundled services with both fixed and mobile Internet access are excluded from the total number of Internet access subscribers.

[24] Standalone service via data cards or modems and bundled services with mobile Internet access included, via 3G, 4G and 5G UMTS/HSPA+/LTE+/NR (5G) mobile networks. (including data transmission packages purchased in addition to voice plans).

[25] The indicator was calculated as the ratio between the number of subscribers to fixed Internet access as of 31 December of the respective year and the number of population according to NSI data as of the same date (https://www.nsi.bg/bg/content/2975/население-по-области-общини-местоживеене-и-пол).

[26] The indicator was calculated as the ratio between the number of household subscribers to fixed Internet access as of 31.12.2025 and the number of households according to the census carried out by NSI in 2021 (2,866,657 households - https://www.nsi.bg/sites/default/files/files/pressreleases/Census2021_Households.pdf)

[27] These include: subscribers to bundled services with mobile Internet access included (including subscribers to data transmission bundles purchased in addition to voice plans), subscribers to standalone services via data cards or modems, as well as subscribers to mobile Internet access services provided without an individual subscription. The indicator was calculated as the ratio between the number of subscribers to mobile access as of 31.12.2025 and the number of population according to NSI data as of the same date (https://www.nsi.bg/bg/content/2975/население-по-области-общини-местоживеене-и-пол)

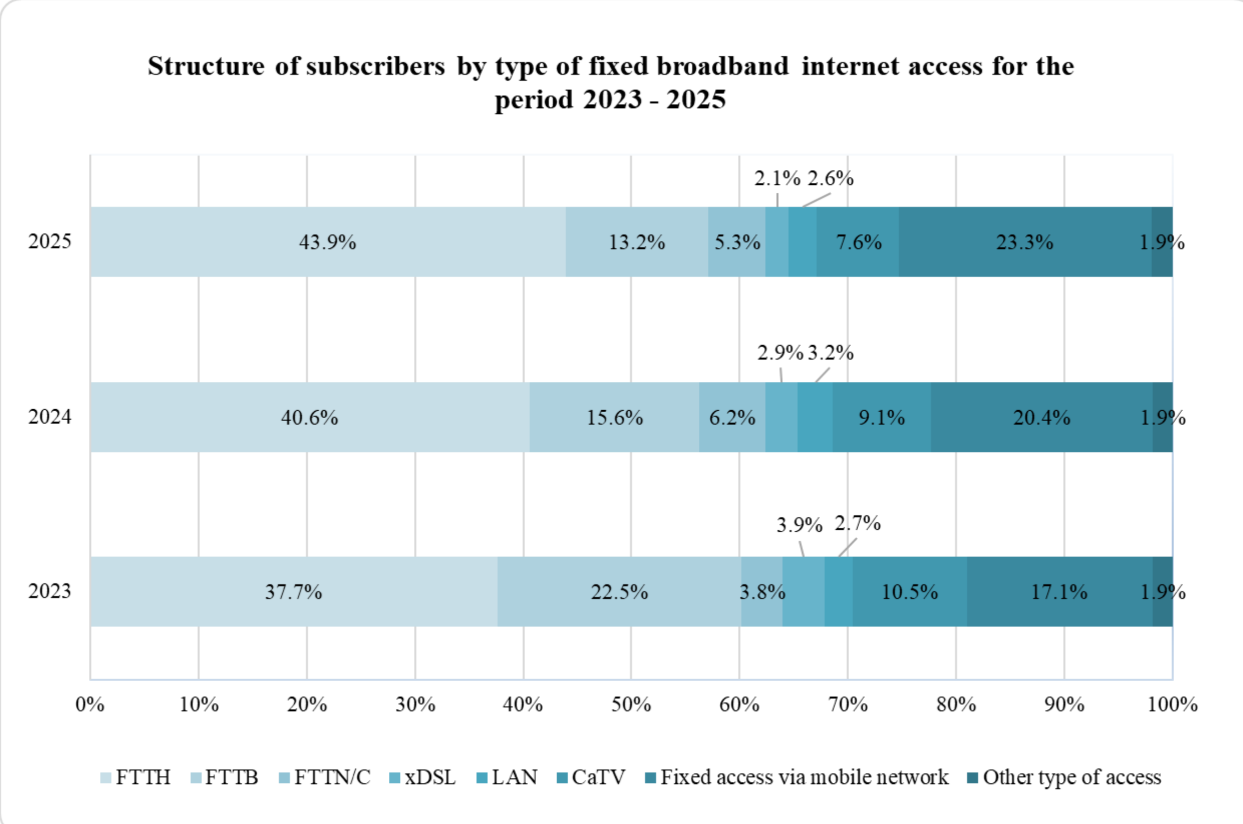


Source: Data submitted to CRC

Figure 25

The indicators "penetration of fixed broadband Internet access by households", "penetration of fixed broadband Internet access by population" and "penetration of mobile Internet access by population" again registered an increase from the previous year by 4.0 percentage points, 2.1 percentage points, and 6.3 percentage points, respectively. As the data clearly show, penetration of fixed broadband access by household and population continued to grow steadily throughout the 2023–2025 period. Penetration of mobile Internet access by population also increased, with the growth recorded during 2024–2025 exceeding that observed in the 2023–2024 period.

The breakdown of subscribers by type of fixed Internet access for the period 2023-2025 is shown in Figure 26.



Source: Data submitted to CRC

Figure 26

At the end of 2025, 62.4% of subscribers to fixed Internet access in Bulgaria used access via fibre-optic networks (FTTH, FTTB and FTTN/C). The upward trend in the total number of subscribers using optical access in absolute terms was preserved. At the end of 2025 there was an increase of 4.8% over a one-year period, while at the end of 2024 this growth was 2.6%. The number of FTTH access subscribers in the total number of fixed access subscribers continued to rise, with the number of "fibre-to-the-home" subscribers registering an increase of 13.3% in absolute terms. The reported increase in the share of FTTH access subscribers compared with the previous year amounted to 3.3 percentage points and for yet another year this type of access strengthens its leadership position in the structure of subscribers by type of fixed broadband Internet access.

In 2024, fixed access over mobile networks replaced FTTB access as the second most widely used type of access based on the number of subscribers. This trend continued at the end of 2025, with fixed access over mobile networks further consolidating its second position, accounting for 23.3% of the total number of subscribers. Its share increased by 2.9 percentage points compared with the end of 2024, while in absolute terms the number of subscribers using this type of access grew by nearly 20% over the one-year period. This significant growth is due both to the widespread coverage of LTE networks nationwide and to the large-scale deployment of 5G NR networks. According to data submitted to CRC, by the end of 2025, LTE networks covered more than 99% of the population and 91% of the country's territory. The corresponding figures for 5G networks were 92% of the population and almost 66% of the national territory, with coverage expected to continue expanding.

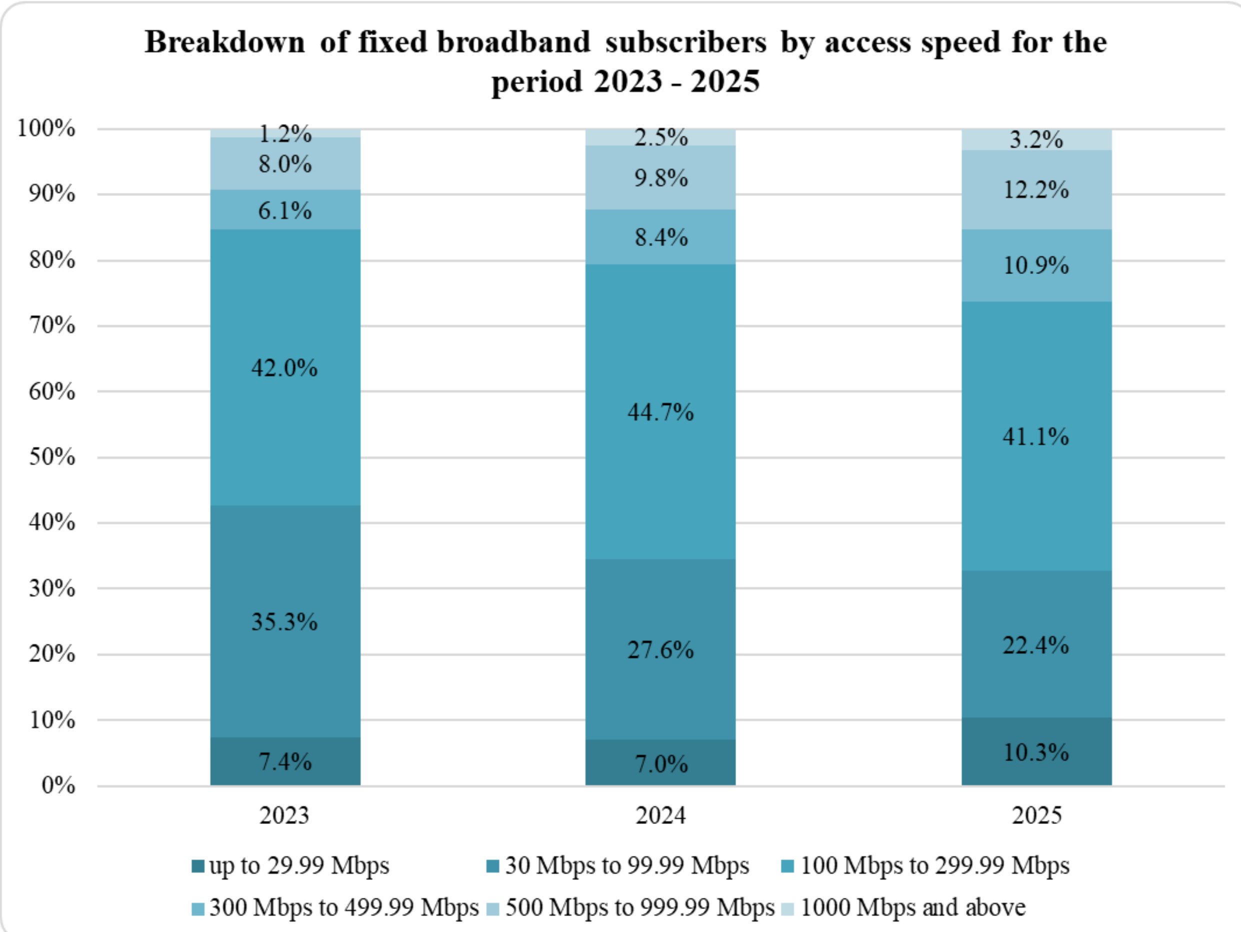
For the second consecutive year, FTTB access remained the third most widely used access technology, accounting for 13.2% of the total number of fixed broadband subscribers. Its share declined by 2.4 percentage points compared with the end of 2024, reflecting both the increase in the number of FTTH subscribers and the continued growth in the number of subscribers using fixed access over mobile networks.

The downward trend in the share of CATV access subscribers (based on cable television networks for the transmission and/or distribution of radio and television programmes using the DOCSIS standard) also continued, with this technology occupying the fourth position. Its share declined by 1.5 percentage points compared with the previous year, falling to 7.6% of the total number of cable access subscribers. CATV access subscribers using DOCSIS 3.0 protocol increased marginally, by 0.1 percentage points, reaching 99.5% of all CATV access subscribers.

The share of xDSL access subscribers, a technology provided exclusively by Vivacom, also continued its downward trend compared with the previous year. It declined by 0.8 percentage points, with the share of xDSL accounting for just over 2.0% by the end of 2025. In 2025, the share of LAN access subscribers fell to 2.6% of the total number of fixed broadband access subscribers, with a registered decrease of 0.6 percentage points. The share of subscribers to "other type of access"[28] was preserved (1.9%) for yet another year, with the largest share in the total number of subscribers to "other type of access" being held by RLAN access with a share of 73.2%, followed by access via leased lines and dedicated access with 18.0%, and access via satellite networks with 8.8%, respectively.

The upward trend in the speed of Internet services offered continued in 2025. Figure 27 presents the breakdown of the number of subscribers to fixed broadband Internet access according to the international download speed for the period 2023-2025.

[28] "Other types of access" includes the following types of access: RLAN access, access via satellite networks, and access via leased lines and dedicated access.



Source: Data submitted to CRC

Figure 27

In view of the development of the electronic communications services market and the increasing use of Internet access at ever higher speeds, the speed intervals used in this report have been updated. The aim is to present the distribution of subscribers according to the Internet access speeds they use, with a focus on speeds above 100 Mbps and an analysis of their development over the 2023–2025 period.

At the end of 2025, users with access speeds in the 100–299.99 Mbps range accounted for the largest share of subscribers by speed interval, representing 41.1%. Compared with the previous year, however, the share of subscribers in this speed range decreased by 3.7 percentage points. The decline in the lower speed range was reflected in growth across the higher speed ranges, where a clear upward trend in the number of subscribers was observed.

In the 300–499.99 Mbps speed range, the share of subscribers increased by 2.5 percentage points over the one-year period and by nearly 5.0 percentage points over the 2023–2025 period. The growth in the 500–999.99 Mbps speed range was similar, with the subscriber share up by 2.3 percentage points over the one-year period and by 4.1 percentage points over the two-year period under review. In absolute terms, the number of subscribers in the 300–499.99 Mbps speed range rose by 35.8%, while the number of subscribers in the 500–999.99 Mbps speed range grew by 30.0% compared with the end of 2024, accounting for 10.9% and 12.2%, respectively, of the total number of fixed broadband Internet access subscribers. In the highest speed range (1,000 Mbps and above), the subscriber share increased by 0.7 percentage points to 3.2%, while the number of subscribers rose by nearly 35% in absolute terms compared with the year before. Overall, by the end of 2025, 67.3% of subscribers were using access speeds of 100 Mbps or higher, representing an increase of 10.0 percentage points compared with 2023.

The relative share of subscribers using access speeds in the 30–99.99 Mbps range continued to decline, reaching 22.4% of the total number of subscribers by the end of 2025. Compared with the end of the previous year, this represented a decline of 5.3 percentage points.

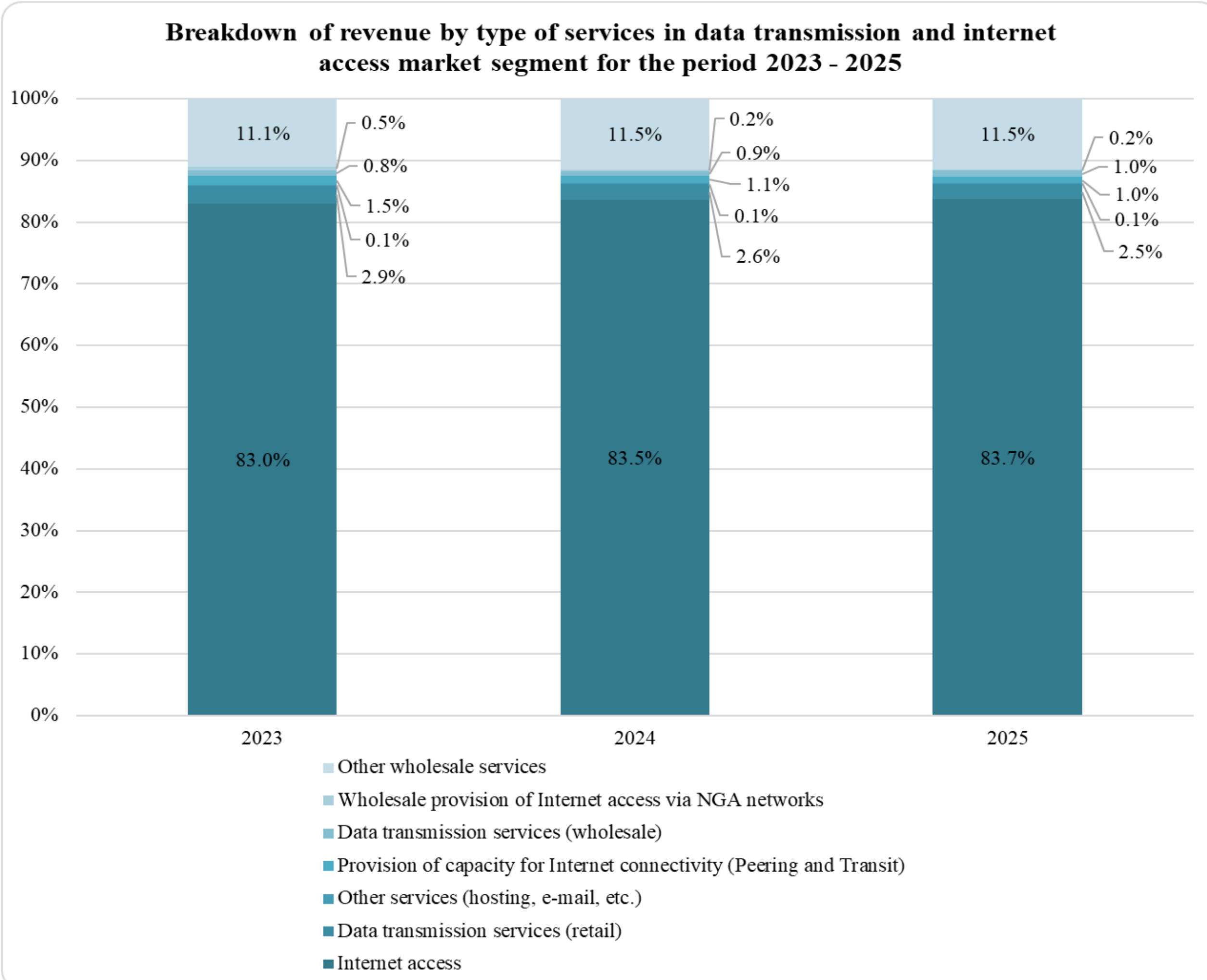
By contrast, the share of subscribers using access speeds of up to 29.99 Mbps increased by 3.4 percentage points, accounting for 10.3% of the total number of fixed broadband Internet access subscribers. This increase was primarily driven by the growing number of subscribers using fixed access over mobile networks, most of whom use access speeds of up to 30 Mbps.

Revenue from data transmission and Internet access

In 2025, revenue[29] from the "Data transmission and Internet access" segment reached BGN 2,376.325 million, representing an increase of 9.1% compared with the previous year. Retail service revenue accounted for 86.3% of total revenue in the segment, while wholesale service revenue represented the remaining 13.7%. The total amount of revenue from retail services was BGN 2,051.059 million, 97.0% of which was revenue from Internet access services (BGN 1,988.599 million). Revenue from wholesale services at the end of 2025 reached BGN 325.266 million, accounting for an increase of 9.0% compared with the previous year.

Figure 28 presents the breakdown of revenue generated for the period 2023-2025.

[29] Including revenue from standalone services for retail fixed and mobile Internet access, retail data transmission services and wholesale services (capacity for Internet connectivity, wholesale access services, wholesale provision of Internet access via next-generation access (NGA) networks, wholesale data transmission services and revenue from Internet access (fixed and mobile) provided bundled with other electronic communication services.



Source: Data submitted to CRC

Figure 28

In 2025, as in the year before, no significant change was observed in the overall revenue structure in the segment. Retail Internet access service revenue maintained its stable share of total segment revenue, accounting for 83.7% in 2025. Over the 2023–2025 period, its share increased by 0.7 percentage points. In absolute terms, this revenue increased by 9.3% compared with 2024. The upward trend in revenue from the provision of mobile Internet access, observed in previous years, continued during the current reporting period, with revenue increasing by 10.3% in 2025. Revenue from the provision of fixed Internet access at retail level rose by 6.2% compared with the 2024 data. Growth of 14.5% compared with 2024 was reported in the distributed revenue from bundled services related to the mobile Internet access[30] service, as this revenue increased by 31.5% for the period 2023-2025. In the part of revenue from bundled services related to the fixed Internet access service[31] the growth was 12.8% for the one-year period and 25.0% versus 2023. In all revenues from the types of services mentioned above, a slowdown in the growth rate was observed for yet another year.

[30] The part of revenue relating to mobile Internet access included in the package.
[31] The part of revenue relating to fixed Internet access included in the package.

Summary

The “Data transmission and Internet access” segment continued to exhibit the trends observed in recent years, which remained evident in 2025, namely:

- The total number of subscribers to fixed and mobile Internet access continued to grow. For yet another year, there was an increase in both the share of FTTH access subscribers in the total number of fixed Internet access subscribers and the share of 5G mobile access subscribers in the total number of mobile Internet access subscribers;
- The share of subscribers using ultra-high-speed Internet access,[32] including those who use gigabit speeds, in the total number of fixed Internet access subscribers, continued to grow;
- The growth in the share of subscribers to fixed access over mobile networks in the total number of subscribers to fixed Internet access was preserved as a result of the wide national coverage of LTE networks and the continued deployment of 5G NR networks;
- The total volume of revenue generated by the segment continued to grow, albeit at a slower pace. Growth was recorded in both retail service revenue and wholesale service revenue.
- There was no shift in the positions of undertakings providing retail mobile Internet access by market share, based on the number of subscribers and revenue. A1 remained the undertaking with the largest market share in terms of revenues. At the same time, it recorded a slight increase in its share of subscribers, at the expense of the other two undertakings, Vivacom and Yettel.

5. Transmission and/or distribution of radio and TV programmes services

In 2025, the volume of the "transmission and/or distribution of radio and TV programmes services" market segment reached BGN 499.067 million, registering a decline of 1.4% since 2024.

Summarised information on the number of undertakings that provided transmission and/or distribution of radio and/or TV programmes services, the number of their subscribers/users, and on the volume of revenue generated from them, along with the structure of the segment, is presented in Table 12 and in Figure 29.

[32] With international download speed of at least 100 Mbps.

Table 12

Number of undertakings, number of subscribers/users and revenues by type of transmission and/or distribution of radio and TV programmes services in the segment provided in 2025

Name of service	Number of undertakings that provided the service in 2025	Number of subscribers/users as of 31.12.2025		Revenue (in million BGN, excluding VAT)	
		Total[1]	incl. subscribers to bundled services	Total[2]	incl. from bundled services[3]
1. Retail distribution of radio and TV programmes	**252**	**1,934,780**	**964,654**	**499.067**	**226.384**
1.1. Cable television	206	360,796	192,833	99.907	54.910
1.2. Satellite television	3	556,012	47,128	145.442	16.210
1.3. IPTV	97	1,017,972	724,693	253.719	155.264
2. Terrestrial broadcasting of radio and TV programmes	**52**	///	///	///	///
3. Provision of transmission/distribution of radio and TV programmes	**10**	**///**	**///**	**35.785**	///
3.1. Transmission of radio and TV programmes services	6	///	///	1.677	///
3.2. Distribution of radio and TV programmes services, incl. wholesale TV service (via IPTV and/or DVB-C method)	7	///	///	34.108	///
Total	**///**	**///**	**///**	**534.853**	**///**

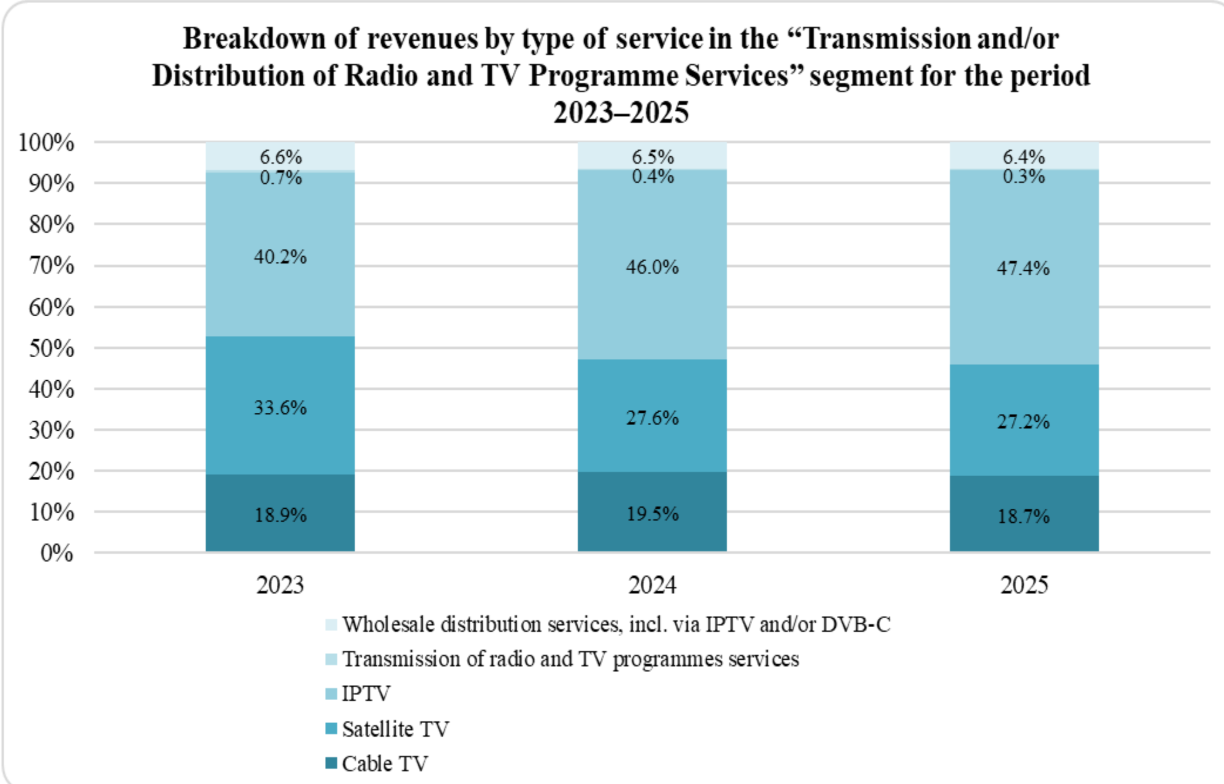
[1] Including subscribers to bundled services.

[2] Including revenue from bundled services.

[3] Revenue from bundled services by TV platform was measured on the basis of the distribution of subscribers to bundled services by platform.

Source: Data submitted to CRC

In 2025, according to the data declared by the undertakings, growth was only registered by revenue from the provision of IPTV – by 1.4%, compared with the previous year. Revenues generated from all other services in the segment decreased over the one-year period considered, with the largest decline recorded in revenue from wholesale transmission of radio and TV programmes services – 18.7%, followed by revenue from cable television by 5.8%. Revenues from wholesale distribution of radio and TV programmes services, including wholesale services via IPTV and/or DVB/C, decreased by 3.7%, while revenues from satellite TV fell by 2.9% year-on-year.



Source: Data submitted to CRC

Figure 29

In 2025, the share of revenue from IPTV, which continued its upward development, remained the highest in the total volume of the segment, as this share grew by 1.4 percentage points over the one-year period in relative terms to arrive at 47.4%. The share of revenue from satellite TV ranked second, as it declined insignificantly - by 0.4 percentage points, to 27.2%, followed by the share of revenue of cable TV which fell by 0.8 percentage points and accounted for 18.7% of the total volume of the segment. The shares held by revenue generated from wholesale services in this market segment did not show a significant change compared with the previous one-year period.

5.1. Retail distribution of radio and TV programmes

Market players

In 2025, 252[33] undertakings provided retail distribution of radio and TV programmes services (Table 13), one more since the year before.

As of 31.12.2025, the total number of undertakings actually providing cable TV amounted to 206 (down by 2 compared with 2024), while the number of IPTV providers was 97.

The undertakings that declared to have provided the satellite TV service in Bulgaria at the end of 2025 remained 3 – A1, Vivacom, and Neosat AD.

[33] Including undertakings that notified CRC for suspension of their activity in 2025 and declared revenue during the year.

The following table shows the relative shares of the first three undertakings, calculated on the basis of the number of subscribers and revenue from the provision of pay-TV at retail level, including the part of revenue from bundled services with television included for the period 2024-2025.

Table 13

Market shares of undertakings providing pay-TV at retail level for the period 2024 - 2025

Undertaking	2024		2025	
	Share based on number of subscribers	Share based on revenue	Share based on number of subscribers	Share based on revenue
VIVACOM BULGARIA	59.6%	56.5%	57.9%	55.1%
A1 BULGARIA	26.5%	31.6%	26.2%	31.7%
YETTEL BULGARIA	1.5%	0.3%	3.3%	1.3%
All other	12.4%	11.5%	12.6%	11.9%

Source: Data submitted to CRC

In 2025, the largest undertakings providing pay-TV remained Vivacom, A1, and Yettel. Vivacom remained the market leader in this market segment, holding a 57.9% market share in terms of subscribers and a 55.1% market share in terms of revenues. However, over the one-year period, the undertaking's market shares declined by 1.7 and 1.4 percentage points, respectively.

A1 kept the second position, as in 2025 the undertaking’s share based on subscribers fell by 0.3 percentage points, while its share based on revenue increased by 0.1 percentage points, accounting for 26.2% of pay-TV subscribers and 31.7% of total revenue generated, respectively.

In 2025, Yettel accounted for 3.3% of the total number of pay-TV subscribers, representing an increase of 1.8 percentage points compared with the previous year. The revenue reported by the undertaking from the provision of the service accounted for 1.3% of total pay-TV revenue, up by 1 percentage point over the one-year period.

All other participants in the market segment, outside the top three, covered 12.6% of subscribers (growth of 0.2 percentage points) and 11.9% of revenue (growth of 0.3 percentage points).

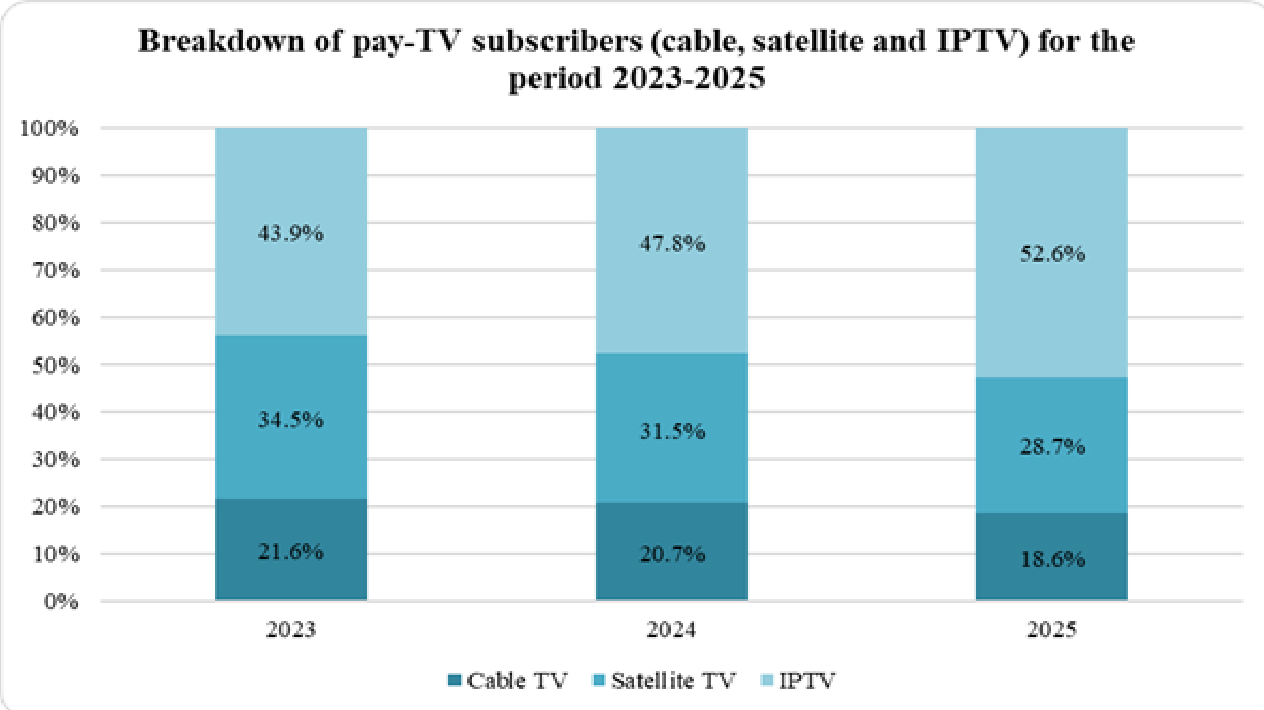
Subscribers to retail distribution of radio and TV programmes services

As of 31.12.2025, the number of retail pay-TV subscribers decreased significantly by 4.1% compared with the end of the previous year, reaching 1.93 million subscribers.[34] This decline is mainly due to a decrease in the number of subscribers to satellite and cable TV in the largest undertakings on the market – Vivacom and A1, which form the majority of the subscribers in the country. The main factors behind the observed decline are the continued migration of users from traditional television platforms to more advanced Internet-based solutions, as well as the changing patterns of audiovisual content consumption. In recent years, there has been growing interest in interactive television services and OTT platforms, including those accessed via smart TV applications, resulting in the gradual migration of some users away from traditional cable and satellite TV services. In addition, the expansion of fibre and 5G infrastructure, together with the high level of competition among providers of IP-based television services, has contributed to the

[34] Including subscribers to bundled services who amounted to 964,654 as of 31.12.2025.

restructuring of the subscriber base within the segment.

Figure 30 presents the shares of subscribers[35] by platform in the total number of pay-TV subscribers for the period 2023-2025.



Source: Data submitted to CRC

Figure 30

At the end of 2025, the number of IPTV subscribers continued to grow compared with the previous reporting period - by 5.6%, with its share registering growth of 4.8 percentage points and already accounting for 52.6% as of 31.12.2025. Nine undertakings started providing IPTV in 2025, with the share of subscribers of these undertakings in the total number of IPTV subscribers amounting to 0.06% as of 31.12.2025. Although there has been an increase in the number of subscribers, in 48% of all other undertakings providing IPTV, the growth in the total number of subscribers to this TV platform during the one-year period was mainly due to the reported increase in the number of subscribers of Vivacom and Yettel.

In 2025, the share of satellite TV subscribers continued to decline, with a decrease of 2.7 percentage points over the one-year period. As a result of this sustained downward trend and of the continued increase in the share of IPTV, satellite TV retained its second position with a share of 28.7% (Figure 30). In absolute terms, the number of subscribers to satellite TV decreased significantly - by 12.4% compared with 31.12.2024.

[35] The data for 2024 have been updated.

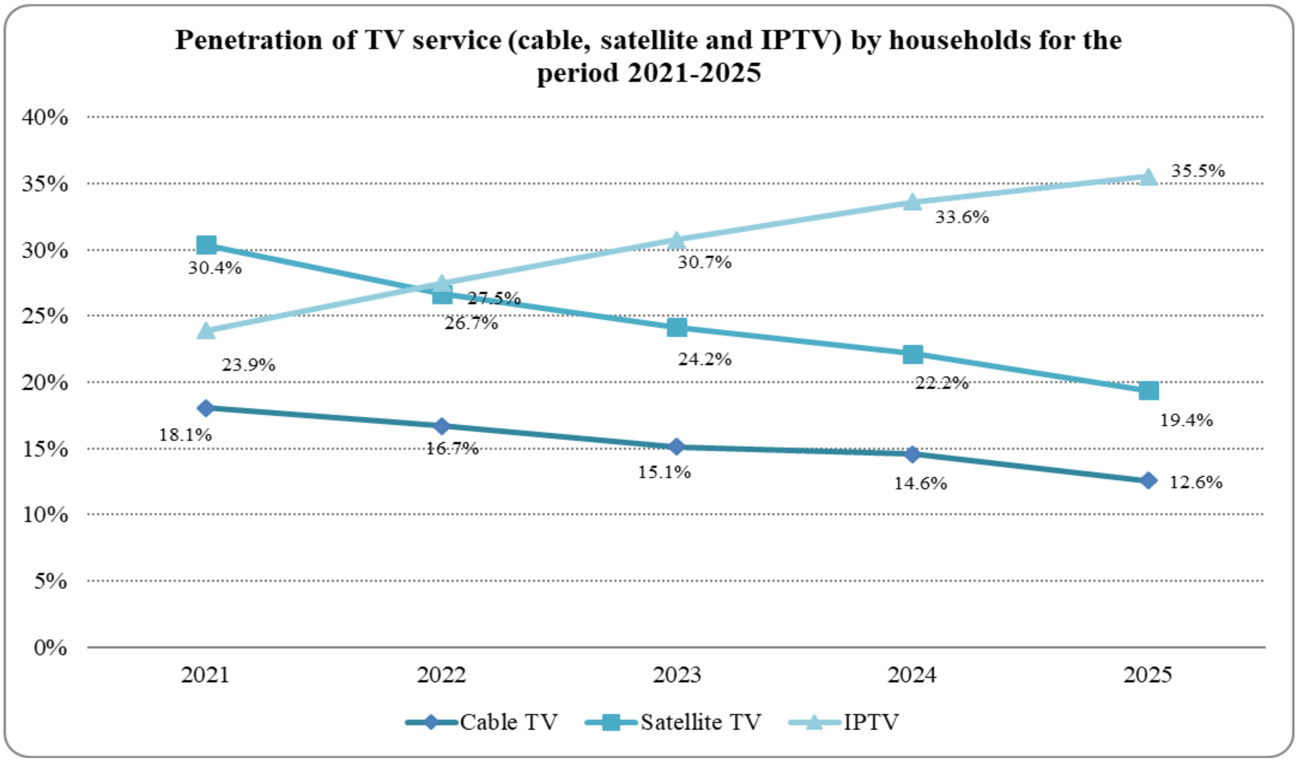
The largest decline in the number of pay-TV subscribers was reported in cable TV subscribers - by 13.8%, and their share in the total number of pay-TV subscribers dropped by 2.1 percentage points to 18.6%.

The changes observed in the breakdown of subscribers by television platform in 2025 confirm the ongoing trend of subscriber migration towards IPTV and OTT services at the expense of traditional cable and satellite platforms. IPTV further consolidated its position as the leading technology in the pay-TV market, widening its lead both in terms of the number of subscribers and market share.

As a result of the decline in subscriber numbers during the period under review, household penetration[36] of pay-TV services in Bulgaria also recorded a significant decrease compared with the previous year. As of 31.12.2025, the indicator had declined by nearly 3 percentage points, reaching 67.5% - a level comparable to that recorded in 2019. Penetration of both cable and satellite television continued to decline, with year-on-year decreases of 2.0 and 2.8 percentage points, respectively. At the same time, IPTV maintained its upward trend, with household penetration of the service reaching 35.5%, an increase of 1.9 percentage points compared with 2024 (Figure 31). A decline was also observed in the penetration of pay-TV services among the country's population,[37] which stood at 30.1% by the end of 2025, down by 1.2 percentage points compared with the previous year.

[36] The indicator was calculated as the ratio between the number of subscribers to pay-TV as of 31.12.2025 and the number of households according to the census carried out by NSI in 2021 (2,866,657 households - https://www.nsi.bg/sites/default/files/files/pressreleases/Census2021_Households.pdf).

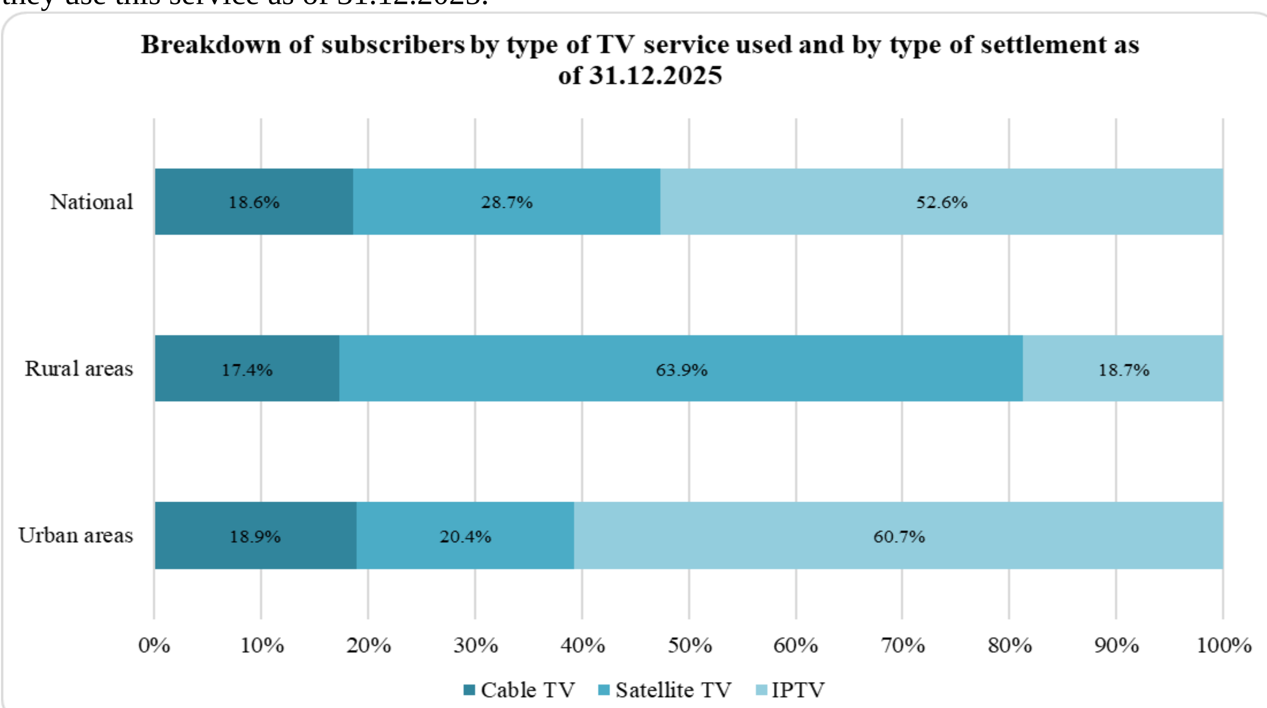
[37] The indicator was calculated as the ratio between the number of pay-TV subscribers as of 31 December of the respective year and the number of population according to NSI data as of the same date (https://www.nsi.bg/bg/content/2975/население-по-области-общини-местоживеене-и-пол).



Source: Data submitted to CRC

Figure 31

Figure 32 displays the breakdown of pay-TV subscribers according to the settlement where they use this service as of 31.12.2025.



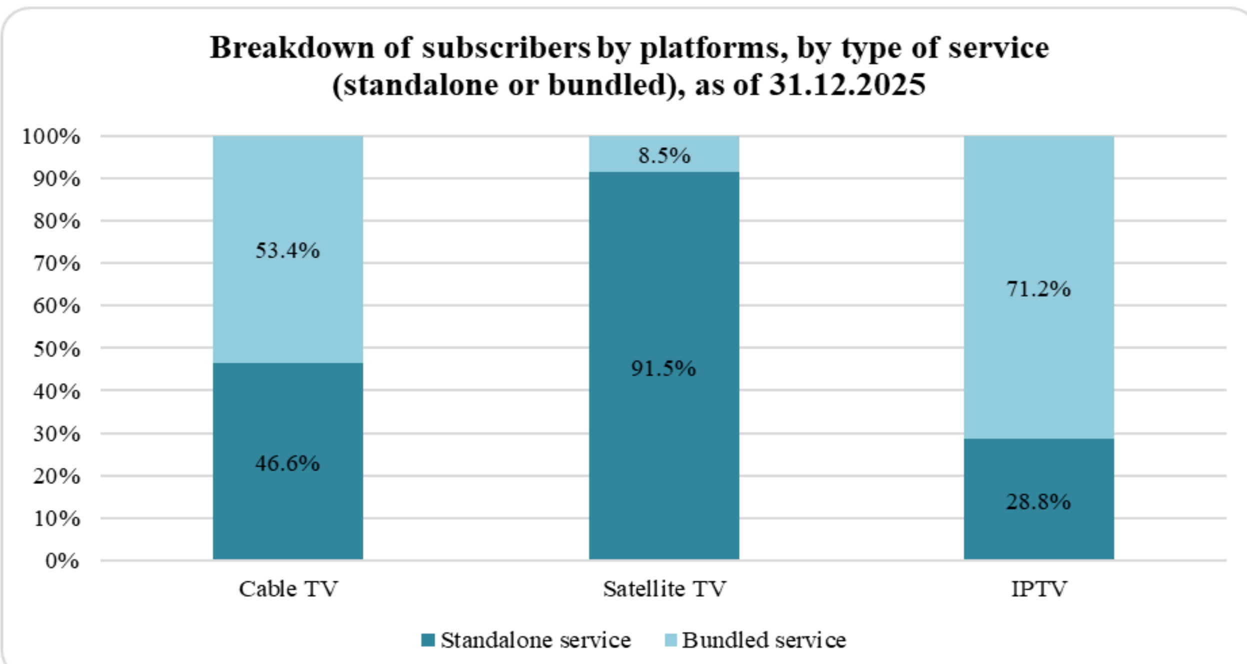
Source: Data submitted to CRC

Figure 32

In 2025, the share of satellite TV subscribers in rural areas continued to decline, decreasing by 0.5 percentage points over the one-year period to 63.9%. At the same time, the number of IPTV subscribers in rural areas increased by 9%, with their share rising to 18.7%, compared with 16.8% a year earlier. A downward trend was also observed in cable TV, as its share of the total number of pay-TV subscribers outside urban areas fell by 1.4 percentage points to 17.4% as of 31.12.2025. In absolute terms, the number of cable TV subscribers in rural areas also decreased, down by 9% compared with the end of 2024.

IPTV remained the leading television platform in urban areas, with its share increasing by 5.7 percentage points compared with the end of 2024, reaching 60.7% of the total number of pay-TV subscribers in urban areas. At the same time, the shares of cable and satellite TV subscribers continued to decline, following the overall trend observed at national level. As of 31.12.2025, the share of cable TV subscribers decreased by 2.2 percentage points to 18.9%, while the share of satellite TV subscribers decreased by 3.5 percentage points to 20.4% (Figure 32).

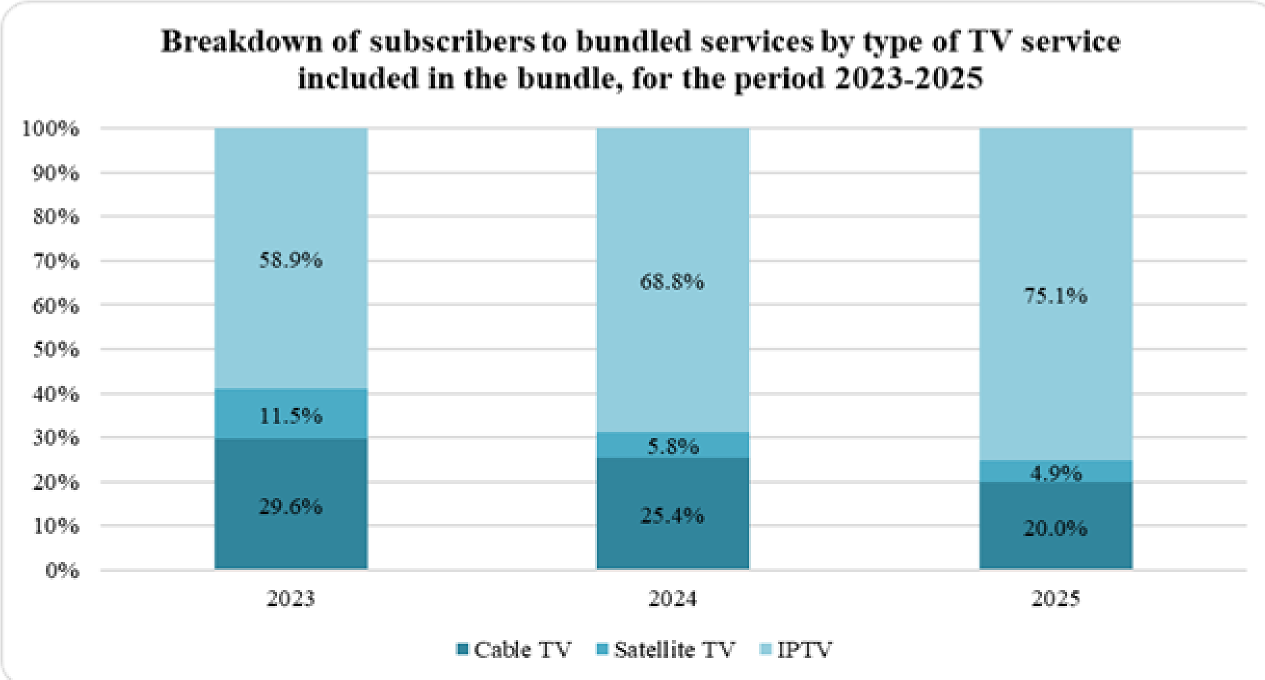
The number of subscribers to bundled services with a TV service included continued to increase and, in 2025, compared with the year before, the reported growth was 10%, and the share it covers in the total number of pay-TV subscribers grew by 6.4 percentage point to arrive at 49.9%. Figure 33 shows the share of subscribers to bundled services with a TV service included in the total number of subscribers distributed by platform, as of 31.12.2025.



Source: Data submitted to CRC

Figure 33

Over the one-year period under consideration, there were changes in the structure of subscribers by type of service used. As compared with the end of 2024, the share of IPTV subscribers who used the service in a bundle increased considerably - by 8.5 percentage points to arrive at 71.2%. Over the same period, the share of subscribers to bundled service including satellite TV grew by 0.5 percentage points to 8.5%, while the share of subscribers to bundled cable TV services rose by 0.3 percentage points to 53.4% of the total number of subscribers using the respective platform (Figure 33).



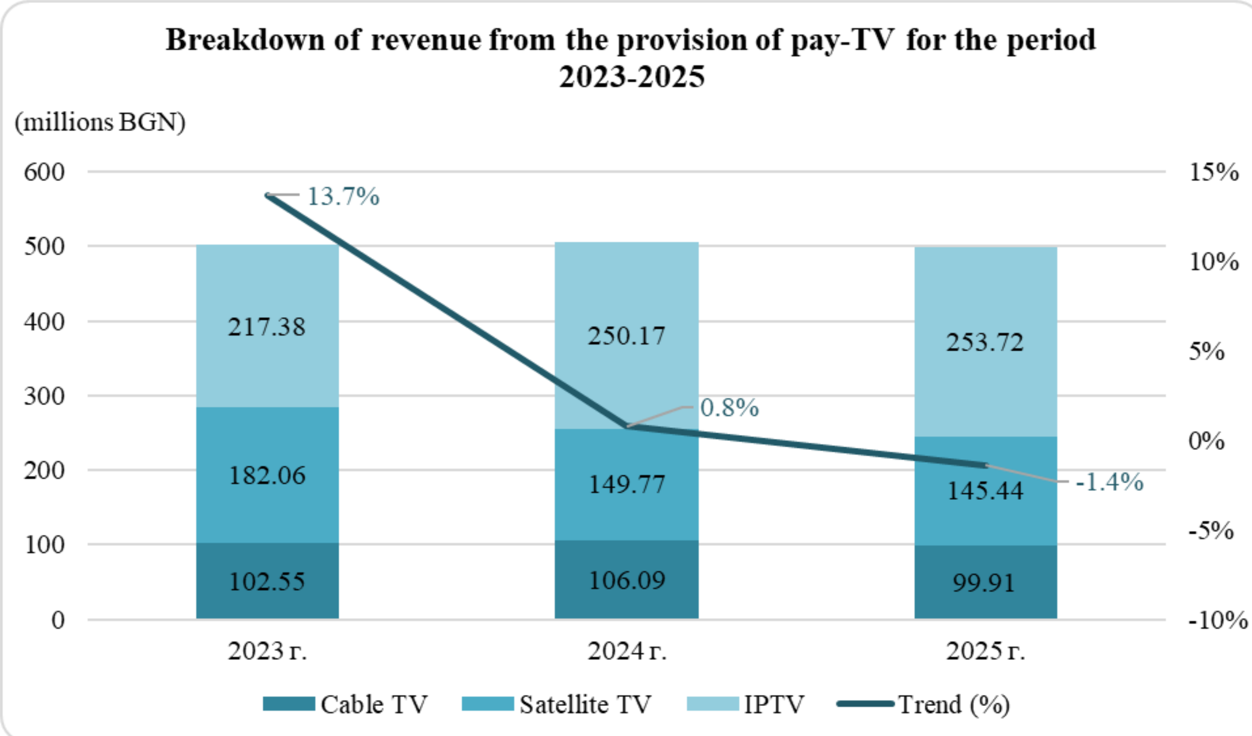
Source: Data submitted to CRC

Figure 34

For the second consecutive year, the number of subscribers to bundles including IPTV increased by 20%. As a result, IPTV's share of the total number of bundled TV service subscribers rose by 6.3 percentage points, reaching 75.1% (Figure 34). The share of subscribers to bundles including cable TV continued to decline and stood at 20% by the end of 2025, representing a decrease of 5.4 percentage points over the one-year period. A downward trend was also observed for bundles including satellite TV, as their share declined by 0.9 percentage points to 4.9%.

Revenue from retail distribution of radio and TV programmes services

The volume of total revenue, including revenue from bundled services with pay-TV included, amounted to BGN 499.067 million, registering a decline for the first time in the last ten years - by 1.4% compared with the previous one-year period. Figure 35 presents the breakdown of revenue from the provision of pay-TV by platform in the retail segment.



Note: *The presented data on revenue from cable television, satellite television and IPTV includes revenue from bundled services with television included, calculated based on the breakdown of subscribers to bundled services with television included, by platform, for each undertaking.*

Source: Data submitted to CRC

Figure 35

In 2025, IPTV was the only platform to record year-on-year revenue growth, with revenue increasing by 1.4%. The share of IPTV in the total volume of revenue in the retail segment also grew - by 1.4 percentage points, reaching 50.8%. In contrast to the previous year, when cable TV recorded growth in both absolute and relative terms, the trend reversed in 2025. Total cable TV revenue declined by 5.8% to BGN 99.91 million, while its share of total retail segment revenue decreased by 0.9 percentage points to 20%. The downward trend in satellite TV revenue also continued, with revenue declining by nearly 3.0% compared with 2024. In relative terms, the change was less pronounced, as its share of total retail segment revenue decreased by 0.5 percentage points to 29.1%.

The share of revenue from the provision of bundled services with television[38] included grew by 3.2 percentage points compared with the previous year to 45.4% of the total volume of the retail segment. With regard to revenue generated from standalone services, decline was recorded across all television platforms during the period under review, amounting to 2.1% for cable TV, 2.7% for satellite TV, and 13.4% for IPTV.

[38] The part of revenue relating to the television service included in the bundle.

5.2. Wholesale transmission and/or distribution of radio and TV programmes and IPTV

In 2025, wholesale transmission and/or distribution of radio and TV programmes services, including via wholesale IPTV and/or DVB-C, was provided by 10 undertakings - down by 2 compared with 2024.

Detailed information on the number of undertakings which in 2025 provided wholesale transmission and/or distribution of radio and TV programmes services, the number of users of these services and the volume of revenue generated from them, is displayed in Table 14.

Table 14

Number of undertakings, number of users, and revenue from the provision of wholesale transmission and/or distribution of radio and TV programmes services in 2025

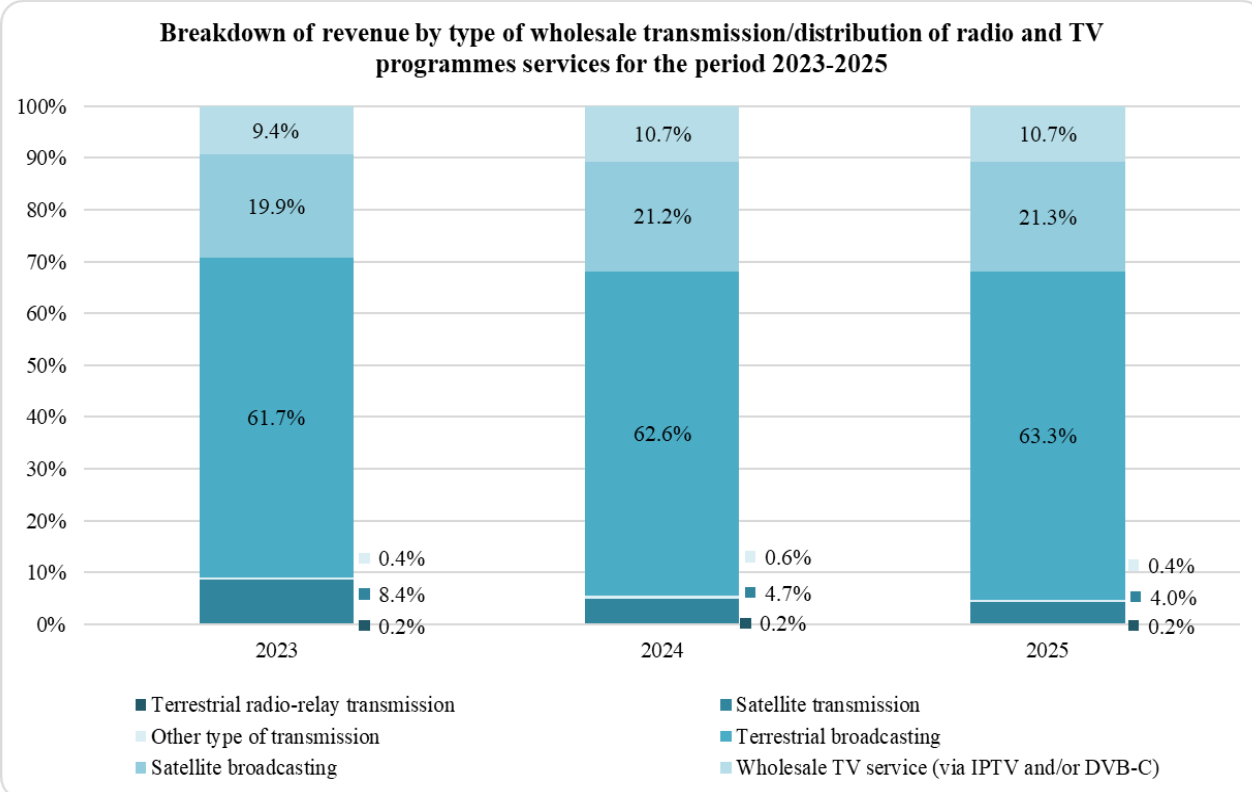
Types of services for wholesale transmission and/or distribution of radio and TV programmes	Number of undertakings providing the service in 2025	Revenue from the service in 2025 (in million BGN, excluding VAT)
Transmission of radio and TV programmes services	6	**1.677**
Wholesale radio and TV programme distribution services, including via IPTV and/or DVB-C, provided to other undertakings	7	**34.108**
Total	**10**	**35.785**

Source: Data submitted to CRC

The number of undertakings providing radio and TV programme transmission services remained unchanged compared with the previous year, standing at six in 2025. Radio and TV programme distribution services, as well as wholesale services provided via IPTV and/or DVB-C, were offered by seven undertakings - two fewer than in the previous year.

The revenue from the provision of wholesale transmission and distribution of radio and TV programmes services fell by 4.5% compared with 2024, to BGN 35.785 million. A decrease was observed for all services included in the wholesale segment over the one-year period, namely: wholesale transmission of radio and TV programmes – by 18.7%, wholesale distribution radio and TV programmes services – by 3.7%, and wholesale TV service provided via IPTV and/or DVB-C– by 4.1%.

Figure 36 shows the breakdown of revenues by type of wholesale transmission/distribution of radio and TV programmes services for the period 2023-2025.



Source: Data submitted to CRC

Figure 36

In 2025, the structure of the wholesale market for "transmission and/or distribution of radio and TV programmes services" remained almost unchanged since the year before. Revenue from terrestrial broadcasting again accounted for the largest share of total revenues, at 63.3%, increasing by 0.7 percentage points compared with 2024. An increase in relative terms was also observed in the share of revenue from satellite broadcasting, which rose by 0.1 percentage points. A decline was recorded in the share of revenue from satellite transmission and other types of transmission, which accounted for 0.7 and 0.1 percentage points less, respectively, of the total wholesale segment revenues. In the case of other wholesale services, there were no significant changes in the shares compared with the previous reporting period.

5.3. Terrestrial broadcasting of radio programmes – VHF broadcasting

At the end of 2025, the number of undertakings holding registration with CRC for the provision of services for terrestrial broadcasting of radio programmes fell by one compared with 2024 - 55, with 52 of them actually providing the service during the year.

Summary

In 2025, the following changes were observed in the "transmission and/or distribution of radio and TV programmes services" segment versus 2024:

- Decrease in the total volume of revenue from the segment as a result of the reported decrease in revenue from the provision of cable TV and satellite TV;
- Decrease in the number of retail subscribers and in the penetration of the television service among households and the population;
- Growth in the consumption of bundled services with retail television included;

- Decline in the revenue from wholesale transmission and/or distribution of radio and TV programmes services;
- Vivacom remained the leader in the market segment, despite the decrease in its market shares reported in 2025. The main competitor of the undertaking continued to be A1, which retained a relatively stable position in the pay-TV market. At the same time, Yettel confirmed its presence in the top three, and over the one-year period it reported a significant increase in both subscribers and revenues from the provision of the service.

6. Prospects for development of the Bulgarian electronic communications market

The electronic communications market in Bulgaria is established as one of the most stable in the structure of the economy. Electronic communications services successfully facilitated the functioning of a number of areas of the country's social and economic life. The market continued to develop dynamically, as clearly demonstrated by the ongoing evolution of undertakings providing electronic communications services. In 2025, the deployment of Very High Capacity Networks (VHCN) continued, enabling the provision of higher speeds and improved connection quality. The development of fifth-generation (5G) NR networks also continued, giving a strong boost to digital services and further enhancing the opportunities available to end-users – Internet of things (IoT), artificial intelligence (AI) solutions, machine learning (ML), cloud-based solutions, autonomous vehicles, smart cities, etc.

The Bulgarian market keeps pace with the rapid transformations in the sector by following the trends, technological changes, and changing consumer behaviour. It possesses all the necessary prerequisites to sustain its upward development trajectory, foster innovation, and generate positive socio-economic impacts. This provides an opportunity for Bulgaria to strengthen its position as one of the digital leaders in the region. The following key trends observed in Bulgaria's electronic communications sector in 2025 are expected to continue in the coming years:

- A decline in the consumption of fixed voice service, as confirmed once again by the data provided by service providers. The 2025 data indicate a decline in the key indicators characterising the service. Reductions were recorded in the number of fixed telephone lines, the volume of end-user call traffic, and the revenues generated from subscribers. There is a clear trend towards end-users increasingly shifting away from traditional voice services in favour of Internet-based interpersonal communications applications, and this trend is expected to continue in the future.
- The mobile voice services market in Bulgaria is mature and characterised by a high level of service penetration among the population. As a result, its growth potential is expected to become increasingly limited in the coming years. As the use of mobile Internet services continues to grow, traditional mobile voice calls are expected to be increasingly replaced by on-line communication applications. Competition among mobile voice service providers is expected to remain strong in the coming years. However, it is also likely to evolve, as mobile voice services are no longer the key driver of growth in Bulgaria's electronic communications market that they once were. Against this background, competition among mobile operators is expected to focus increasingly on the quality and volume of mobile data services, as well as on value-added services, with voice services playing a complementary role.

- In the data transmission and Internet access segment, the share of subscribers using ultra-high-speed fixed Internet access in the total number of fixed Internet access continued to increase, including those subscribing to gigabit-speed services. The share of subscribers to fixed access over mobile networks in the total number of subscribers to fixed Internet access continued to grow due to the wide coverage of LTE networks and to the continued deployment of fifth-generation (5G) NR networks nationwide; These trends are expected to become more firmly established as a result of the investments in digital infrastructure envisaged under the National Recovery and Resilience Plan. Mobile operators will continue to exert strong competitive pressure on providers of fixed broadband Internet access services. The increase recorded in 2025 in the share of fifth-generation (5G) network subscribers in the total number of mobile Internet subscribers is expected to continue in the coming years.
- The trends observed in 2025 confirm the ongoing transformation of the pay-TV market towards IP-based and OTT services, and this process is expected to intensify further in 2026. IPTV will maintain its leading position in terms of both subscriber numbers and revenues, driven by the continued expansion of optical and 5G infrastructure and by growing consumer demand for interactive and personalised ways of accessing audiovisual content. Competition among the leading pay-TV providers is expected to focus increasingly on the provision of bundled services incorporating IPTV, mobile Internet access, and streaming platforms, as well as on the development of their own OTT solutions. In this regard, the importance of traditional television platforms - cable TV and, in particular, satellite TV - is likely to continue to decline.
- In the bundled services segment, the growth trends in both consumption and revenue that have characterised the market in recent years continued throughout 2025. The growth of revenue from bundled services was mainly due to the increase in revenue generated from bundles with mobile Internet access, fixed Internet access, and in revenue from bundles with television service included; The dominant role of the double-play bundles was also preserved. The segment continued to be highly concentrated and there was no redistribution of market shares among the three largest undertakings in 2025, with their total share based on number of subscribers amounting to 98.6%. A1 continued to hold the largest market share, followed by Vivacom and Yettel.
- The market is showing a clear trend towards the stabilisation of the overall level of investment, with only marginal growth being recorded. This may be regarded as an indication of the transition from a phase of intensive network deployment to one focused on the optimisation and technological upgrading of existing infrastructure.

With regard to the prospects for development of the electronic communications sector, it is important to note that the European Commission has proposed for consultation a draft Digital Networks Act (DNA), intended to replace the European Electronic Communications Code (EECC). In general, the proposed legislative framework aims to strengthen digital networks in order to provide the foundation for the wider adoption of artificial intelligence, cloud technologies, space technologies, and other innovative technologies, thereby accelerating Europe's digital transformation for the benefit of its citizens. This is expected to have a significant impact on the Bulgarian electronic communications market as well.

7. Provision of the universal service

Directive (EU) 2018/1972 of the European Parliament and of the Council establishing the European Electronic Communications Code (EECC), transposed into the current Electronic Communications Act (ECA), amends and further develops the concept of universal service in order to reflect technological progress, market developments, and consumer demand. The scope of the universal service has changed accordingly and already covers the provision of voice telephony services by connecting at a fixed location to a public electronic communications network regardless of the technology used as well as the provision of adequate broadband Internet access at a fixed location.

The amendment of the scope of universal service and the modernisation of the services included therein require the implementation of a new procedure for the assignment of obligations for its provision. Under the current regulatory framework, an assessment must be carried out to determine the availability, at a fixed location, of an adequate broadband Internet access service and voice communications services, as well as whether these services can be provided under normal commercial conditions. To this end, an assessment of the current geographical coverage of broadband networks throughout the territory of the country should be carried out, as required for the tasks of national regulatory authorities under the EECC. This assessment may also include forecasts of broadband network coverage, including Very High Capacity Networks (VHCN). Where, on the basis of a geographical survey of the coverage of electronic communications networks capable of providing broadband access (“broadband networks”), it is established that the aforementioned services are not available under normal commercial conditions throughout the country or in different parts thereof, CRC may impose obligations on one or more undertakings to provide all or some of the services included in the scope of universal service throughout the entire territory or in part of the territory of the country. Such obligations aim to ensure the availability of universal service nationwide and to satisfy all reasonable requests from end-users for access to these services. In this regard, the completion of the procedure for upgrading the Single Information Point, administered by the Ministry of Transport and Communications, and the collection of the necessary information on electronic communications networks from undertakings providing electronic communications networks and services are expected.

7.1. Degree of satisfaction from the universal service provision

In 2025, Vivacom continued to ensure public payphones and/or other points of public access to voice telephony services of certain quality that had been installed as of the date of adopting Decision No. 350/30.09.2021, which abolished the obligations to provide public payphones and/or other points of public access to voice telephony services of certain quality, ensuring telephone directory and provision of telephone enquiry services imposed as an obligation for the provision of universal service as part of the services within the scope of universal service.

In 2025, the telephone density by households[39] continued to decline, which is a consequence of the established steady downward trend in the total number of Vivacom’s residential subscribers. Compared with the previous year, the indicator fell by 1 percentage point.

7.2. Analysis of the provision of universal service

At present, the obligations to provide services within the scope of universal service, assigned to the Bulgarian Telecommunications Company AD (currently Vivacom Bulgaria EAD) in accordance with § 7 of the Transitional and Final Provisions of the Law on Electronic Communications (LEC), remain in force. These obligations relate to the provision, with a specified quality level and at affordable prices throughout the territory of the country, of the following services:

- initial connection to the public fixed telephone network at a network termination point and access to fixed voice communications services (subscription), enabling the origination of local, national and international calls;

- free access to emergency services;

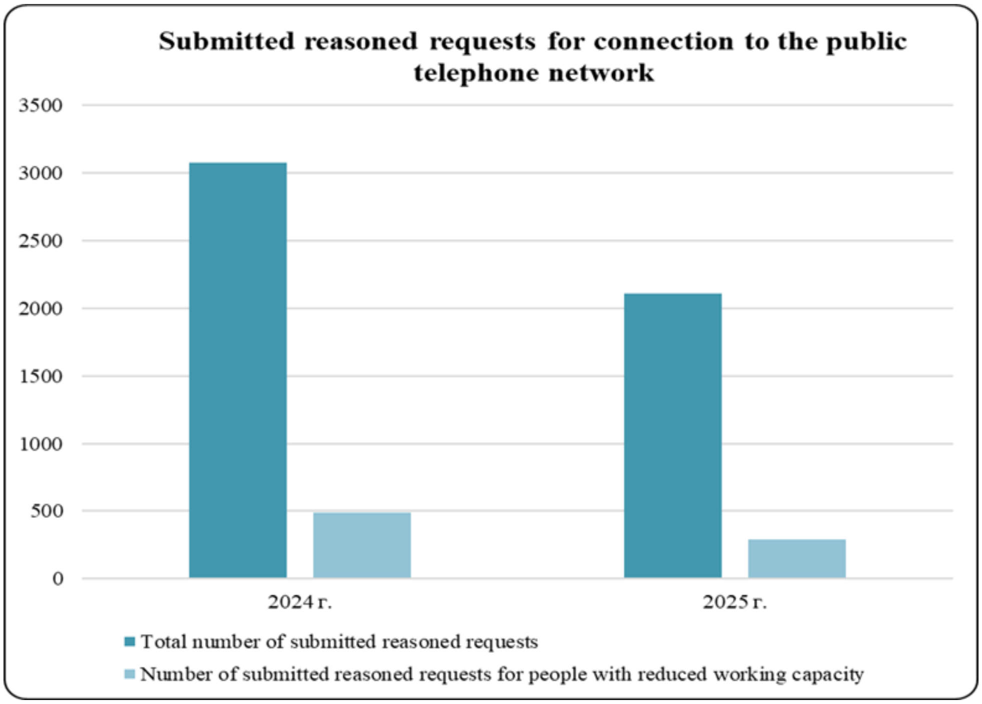
- provision of access to fixed voice telephony services under special conditions and/or provision of terminal equipment, where appropriate, for persons with disabilities or persons in a vulnerable situation.

7.2.1. Access to and provision of universal service

As of 31.12.2025, the total number of reasoned requests submitted for connection submitted decreased by 31% compared with the previous year, as shown in Figure 37 below. In the case of applications for connection submitted by persons with disabilities, there was a drop of 41% in 2025 compared with 2024. At the end of 2025, only 0.4% of the submitted reasoned applications are waiting to be satisfied by Vivacom.

For another consecutive year, CRC has recorded a decline in the number of reasoned requests for connection submitted, further confirming the sustained trend of declining interest in the service. This change is primarily attributable to the fact that mobile voice services are significantly more convenient for users compared with fixed voice services. In addition, the diverse range of tariff plans offered to end-users, including bundled allowances for calls, Internet access and other services, continued to have a significant impact on the declining interest of users in fixed voice services.

[39] The ”density by households“ indicator is measured by dividing the total number of residential lines by the number of households in the country (based on data from the last official census carried out by NSI in 2021).



Source: Data submitted to CRC

Figure 37

The share of rejected connection applications, as compared with the total number of submitted applications, amounted to 8% in 2025, with no significant difference compared with the rejected applications recorded in 2024. In 2025, the predominant reason for rejecting applications continued to be the withdrawal of customer interest, accounting for 93% of all rejected applications during the year. These figures confirm the already established decline in end-users' interest in using fixed voice services.

7.2.2. Access to public payphones

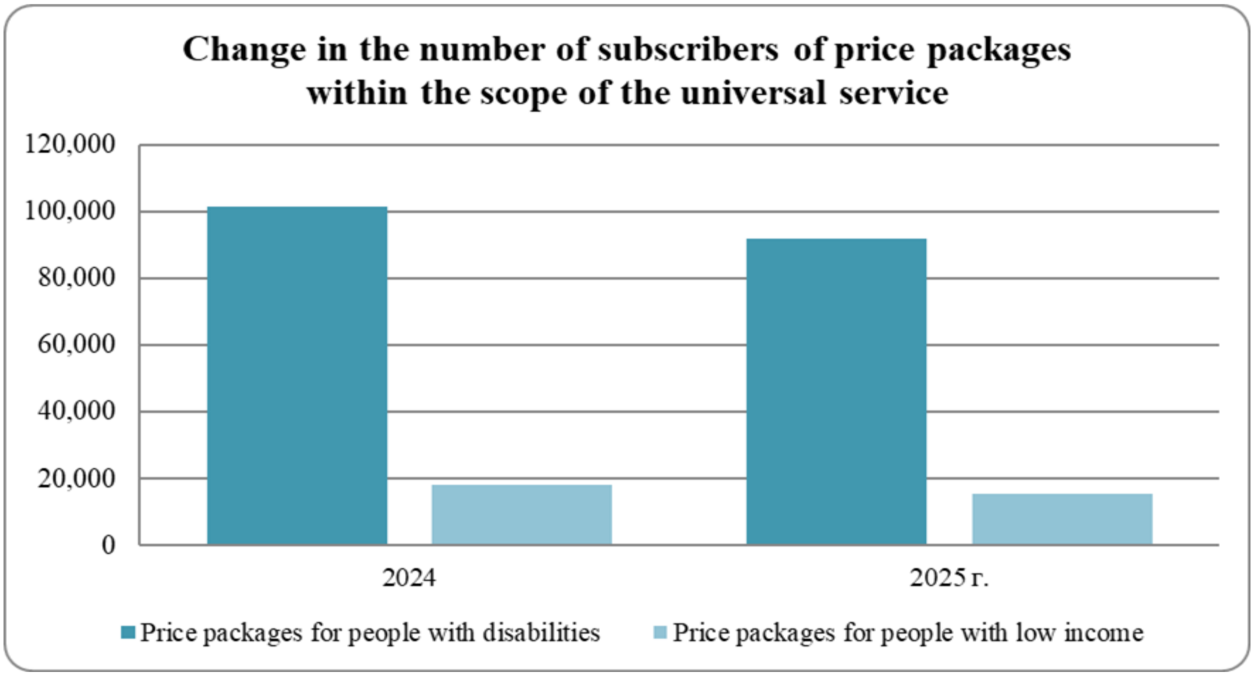
As of 31.12.2025, Vivacom performs its obligation to ensure free-of-charge calls to emergency numbers. The downward trend in the volume of traffic generated to these numbers has continued over the past five years, with the number of calls to emergency numbers also decreasing at a similar rate compared with the previous year.

In order to ensure users' access to telephone services, Vivacom continued to provide public payphones, with their number down by 16% compared with those installed as of the date of Decision No. 350/30.09.2021. Accordingly, in 2025, Vivacom continued to ensure the possibility of making free-of-charge calls to the national emergency numbers and to the single European emergency number 112, as such calls can be made from all public payphones.

7.2.3. Affordability of tariffs of universal service

In 2025, Vivacom continued to offer, without any change in the prices and conditions, the price packages intended for the following users: persons with low income ("Limited" plan, as named by Vivacom); with over 90% impaired work capacity or capacity for social adaptation ("Handicap 160" plan, as named by Vivacom); with over 50% impaired work capacity or capacity for social adaptation ("Handicap 300" plan, as named by Vivacom); and people with special social needs admitted to social or health institutions ("Social and Healthcare Institutions" plan, as named by Vivacom), in view of the existing obligations to provide price packages falling within the scope of universal service at affordable[40] prices.

As of 31.12.2025, the subscribers of price packages within the scope of universal service decreased by 10% compared with those in 2024. Figure 38 displays the trend in the number of subscribers to price packages within the scope of universal service for 2024 and 2025.



Source: Estimates based on data submitted to CRC

Figure 38

In 2025, the downward trend in the use of price packages included within the scope of universal service continued, with the number of subscribers to price packages for persons with low incomes decreasing by 14% and the number of subscribers to price packages for persons with disabilities decreasing by 10% compared with 2024. During the same period, the number of subscribers using price packages for persons with special social needs also declined by 2%, with their relative share accounting for 0.4% of the total number of users of price packages included within the scope of universal service.

7.3. Quality of the universal service provision

The target values of the quality-of-service parameters for the provision of universal service were adopted by CRC Decision No. 345/31.03.2011 and are publicly available on the Commission's official website[41]. According to the data submitted by Vivacom[42], in 2025, the undertaking reported fulfilment of these target values.

[40] Stipulated in the Methodology for determining prices and price packages for the universal service adopted with Ordinance No. 36 of 10.03.2023 of the Council of Ministers, prom. SG, no. 24 of 17.03.2023.

[41] http://www.crc.bg/section.php?id=904&lang=bg

7.4. Compensation of net costs accrued due to the universal service provision

In 2025, Vivacom did not submit to CRC a request for compensation of the unfair burden from the universal service provision within the statutory deadline - 30.06.2025. Thus, during the last year, the amount of net costs was not calculated and it was not established whether these expenditures represent an unfair burden for the incumbent undertaking.

As regards the amendment of the rules of activity of the Universal Service Compensation Fund in order to bring it into compliance with the current regulatory framework, adopted by Decision No. 1 of 30.03.2021, in 2025, no meeting was held due to the absence of a request for compensation of net costs by the incumbent undertaking.

7.5. Complaints and complaint resolution

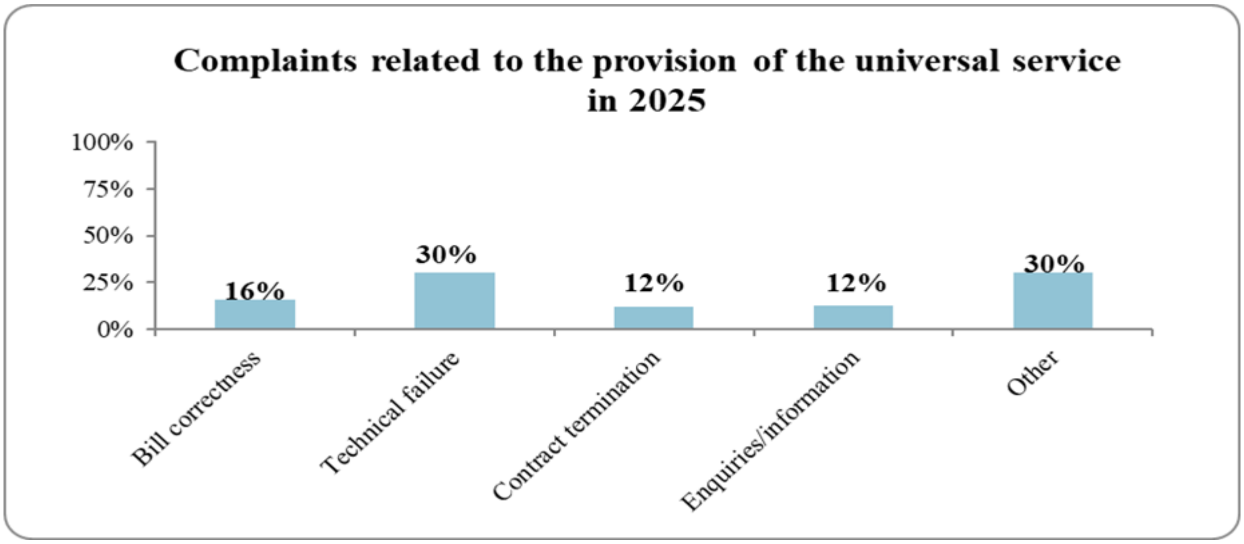
According to the General Terms and Conditions governing the relations between Vivacom and the end-users, the undertaking gives options to the users to individually track and control their costs through: the provision of itemised bills[43] free of charge, selective limitation of outgoing calls free of charge, and deferred payment when connecting to public telephone networks.

As of the end of 2025, there was a significant growth of 59% in the number of complaints received by Vivacom regarding the provision of universal service. The most frequent subjects of complaints were technical faults, accounting for 30% of the total number of complaints received in 2025, as well as tips for “other” causes, which also represented 30% of all complaints submitted in relation to the provision of universal service. The remaining causes for submitting consumer complaints included the accuracy of monthly bills, which accounted for 16% of the total number of complaints, termination of contractual relations (12%), and compaints related to enquiries and/or information.

The predominant causes for filing complaints are illustrated in Figure 39.

[42] Through the CRC’s electronic system for on-line questionnaires

[43] The content of the itemised bill is defined in Article 260, paragraph 3 LEC.



Source: Data submitted to CRC

Figure 39

Despite the significant increase in the number of complaints received in 2025, no substantial change was observed in the main causes for complaints related to the provision of universal service.

In 2025, there were no complaints from consumers regarding violation of contractual clauses, violation of deadlines for provision of the service, monthly bill clarification, and service.

7.6. Prospects for development of universal service

The inclusion of broadband Internet access within the scope of universal service reflects the revised concept of ensuring connectivity for all citizens, taking into account the fact that Internet access has become a necessity for the effective participation of all citizens in the social and economic life of the country. For this reason, the provision broadband Internet access at an appropriate speed at a fixed location as part of universal service, acting as a safety net, ensures the availability of at least a minimum set of services for all end-users, given the essential importance of this service for the development of all areas, including the economy, trade, the banking sector, healthcare, and others. Nevertheless, end-users have the right to limit the use of universal service, where such service has been designated, to the provision of telephony services only.

Following the completion of the procedure for upgrading the Single Information Point, administered by the Ministry of Transport and Communications, and the collection of the necessary information on electronic communications networks from undertakings providing electronic communications networks and services, an assessment will be carried out to determine the availability, at a fixed location, of an adequate broadband Internet access service and telephony services, and whether the latter can be provided under normal commercial conditions. Where the absence of the aforementioned services under normal commercial conditions is established throughout the country or in part of its territory, CRC will conduct a procedure for assigning obligations for the provision of universal service, or part thereof, throughout the country or in part of its territory.

II. LEGAL AND REGULATORY FRAMEWORK

1. EU regulatory framework for electronic communications

At present, the legal framework in the sphere of electronic communications at European level is based on Directive (EU) 2018/1972 of the European Parliament and of the Council of 11 December 2018 establishing the European Electronic Communications Code. Regulation (EU) 2022/612 of the European Parliament and of the Council of 6 April 2022 on roaming on public mobile communications networks within the Union (the Roaming Regulation) which revised the European legal framework for the use of roaming services in the Community is also applicable. Regulation (EU) 2022/2065 of the European Parliament and of the Council of 19 October 2022 on a Single Market for Digital Services and amending Directive 2000/31/EC (Digital Services Act/DSA) has been applied since 17 February 2024. The Digital Services Act regulates online intermediaries and platforms such as markets, social networks, content sharing platforms, app stores and online travel and accommodation platforms.

2. Legal and regulatory framework in Bulgaria

The amendments to the Law on Electronic Communications (LEC), promulgated in the State Gazette, no. 100 of 25 November 2025, ensured the implementation of the requirements of the DSA. The Law establishes the status and powers of the Digital Services Coordinator (the Coordinator), namely CRC. The Communications Regulation Commission will exercise supervision over the activities of providers of intermediary services of the information society.

The Accessibility Requirements for Products and Services Act (ARPSA/the Act) was promulgated in the SG, no. No. 31 of 11 April 2025. The Act transposes the requirements of Directive (EU) 2019/882 on the accessibility requirements for products and services. Under this Act, CRC is designated as the competent authority with regard to accessibility requirements for electronic communications services.

On 13.02.2026, the Law on Amendment and Supplement to the Cybersecurity Act (CSA) was promulgated in the State Gazette, no. 17.

The CSA designates providers of public electronic communications networks and providers of publicly available electronic communications services as obliged entities and designates CRC as the national competent authority with regard to these providers (of public electronic communications networks or publicly available electronic communications services).

In addition, CRC also applied the Law on Electronic Communications Networks and Physical Infrastructure (LECNPI), which regulates the provision of access to and use of existing physical infrastructure. In view of the powers of CRC, it is important to note that the Commission is a dispute settlement body under the said laws.

In the past year 2025, these legislative acts were not substantially amended.

3. Important regulatory decisions of CRC in 2025

- ✓ By Decision No. 12 of 09.01.2025, CRC issued binding instructions to Yettel Bulgaria EAD in response to a request submitted by Universal Trading Group EOOD (Ref. No. 10-00-644/05.09.2024);
- ✓ By Decision No. 33 of 16.01.2025, CRC issued binding instructions to Vivacom Bulgaria EAD in response to a request submitted by Universal Trading Group EOOD (Ref. No. 10-00-645-1/09.09.2024);
- ✓ By Decision No. 40 of 23.01.2025, CRC issued an opinion on a dispute under the Postal Services Act;
- ✓ By Decision No. 44 of 30.01.2025, CRC assigned the number 116 016 to the Administration of the Council of Ministers for the provision of the harmonised service of social value “Helpline for Victims of Violence against Women”.
- ✓ By Decision No. 55 of 06.02.2025, CRC adopted a summary annual report on received notifications of security-related incidents that have had a significant impact on the functioning of networks or services and on the actions taken in this regard in 2024 by the undertakings providing public electronic communications networks or services;
- ✓ By Decision No. 56 of 06.02.2025, CRC issued binding instructions to A1 Bulgaria EAD to conclude an agreement for interconnection between its mobile network and the fixed network of Inspire Communications EOOD for the provision of voice call termination services for calls originating within the territory of the Republic of Bulgaria and for calls originating outside the territory of the Republic of Bulgaria, in accordance with the requirements of the Law on Electronic Communications (LEC) and Ordinance No. 1 of 24.11.2022 on the terms and conditions for the provision of access and/or interconnection;
- ✓ By Decision No. 78 of 13.02.2025, CRC requested information pursuant to the Measures Against Money Laundering Act from operators licensed to provide postal money order services under Article 39(3) of the Postal Services Act (PSA);
- ✓ By Decision No. 117 of 13.03.2025, CRC requested information pursuant to Article 17 (4) of Regulation (EU) 2022/612 of the European Parliament and of the Council of 6 April 2022 on roaming on public mobile communications networks within the Union;
- ✓ By Decision No. 123 of 20.03.2025, CRC declined to issue binding instructions in response to the request submitted by SOF TELECOM EOOD (Ref. No. 14-00-636-5/15.11.2024);
- ✓ By Decision No. 131 of 27.03.2025, CRC issued binding instructions to ELEKTRORAZPREDELENIE YUG EAD;
- ✓ By Decision No. 132 of 27.03.2025, CRC issued binding instructions to ELEKTRORAZPREDELENIE YUG EAD;
- ✓ By Decision No. 133 of 27.03.2025, CRC issued binding instructions to ELEKTRORAZPREDELENIE YUG EAD;
- ✓ By Decision No. 137 of 13.04.2025, CRC requested information pursuant to Article 5a (6)(1) of Regulation (EU) 2015/2120 of the European Parliament and of the Council of 25

November 2015 laying down measures concerning open internet access and retail charges for regulated intra-EU communications and amending Directive 2002/22/EC and Regulation (EU) No 531/2012;

- ✓ By Decision No. 171 of 08.05.2025, CRC adopted an opinion on a submitted hypothetical scenario for calculating the net costs of performing the universal postal service in 2024 by BULGARIAN POSTS EAD;
- ✓ By Decision No. 169 of 08.05.2025, CRC issued binding instructions to A1 Bulgaria EAD in response to a request submitted by Universal Trading Group EOOD (Ref. No. 14-00-1555/16.12.2024);
- ✓ By Decision No. 198 of 12.06.2025, CRC issued binding instructions requiring United Fiber Bulgaria EOOD to apply the pricing conditions in force as of 31.12.2022, as finally confirmed by Supreme Administrative Court Decision No. 5932/04.06.2025 in Administrative Case No. 3782/2025, until prices for the services are determined in accordance with the approved Reference Offer for Access to Passive Infrastructure;
- ✓ By Decision No. 215 of 26.06.2025, CRC adopted the 2024 Analysis of the Postal Market Report;
- ✓ By Decision No. 214 of 26.06.2025, CRC adopted a final Annual Report of the Communications Regulation Commission for 2024;
- ✓ By Decision No. 213 of 26.06.2025, CRC adopted a Regulatory Policy for the Management of Radio Spectrum for Civil Needs;
- ✓ By Decision No. 211 of 26.06.2025, CRC issued binding instructions requiring United Fiber Bulgaria EOOD to apply the pricing conditions in force as of 31.12.2022, as finally confirmed by Supreme Administrative Court Decision No. 5932/04.06.2025 in Administrative Case No. 3782/2025, until prices for the services are determined in accordance with the approved Reference Offer for Access to Passive Infrastructure;
- ✓ Decision No. 226 of 10.07.2025 on a dispute between YETTEL BULGARIA EAD and VIVACOM BULGARIA EAD and UNITED FIBER BULGARIA EOOD over access to an electronic communications network.
- ✓ By Decision No. 240 of 24.07.2025, CRC revoked Individual Licence No. 3-034/27.08.2020 for the provision of postal money order services, issued to Cash Credit EAD, with effect from 27.07.2025;
- ✓ By Decision No. 308 of 16.10.2025, CRC issued Individual License No. 3-043/16.10.2025 for the provision of postal money order services on the territory of the Republic of Bulgaria to FACTOR I.N. AD;
- ✓ By Decision No. 316 of 23.10.2025, CRC adopted the results of the public consultation on the draft decision concerning the definition, analysis and assessment of the wholesale market for local access at a fixed location, initiated by CRC Decision No. 258 of 14.08.2025, and initiated a further public consultation procedure;
- ✓ By Decision No. 315 of 23.10.2025, CRC adopted a draft of the General Rules on the Conditions for the Delivery of Postal Items and Postal Parcels and initiated a public consultation;
- ✓ By Decision No. 333 of 06.11.2025, CRC coordinated the results of the implementation of

the Cost Allocation System of Bulgarian Posts EAD in 2024;

- ✓ By Decision No. 334 of 06.11.2025, CRC adopted the total amount of the net costs of providing the universal postal service by Bulgarian Posts EAD for 2024 and found that they constituted an unfair financial burden arising from the provision of the universal postal service, amounting to BGN 61,295 thousand;
- ✓ By Decision No. 332 of 06.11.2025, CRC coordinated the prices of the services included in the universal postal service provided by Bulgarian Posts EAD which will apply from 01.01.2026;
- ✓ By Decision No. 344 of 20.11.2025, CRC adopted an Analysis of the Need to Review the Tariff of Fees Collected by CRC under the LEC and opened a public consultation;
- ✓ By Decision No. 343 of 20.11.2025, CRC issued binding instructions requiring United Fiber Bulgaria EOOD to apply the pricing conditions in force as of 31.12.2022, as finally confirmed by Supreme Administrative Court Decision No. 5932/04.06.2025 in Administrative Case No. 3782/2025, until prices for the services are determined in accordance with the approved Reference Offer for Access to Passive Infrastructure;
- ✓ By Decision No. 341 of 20.11.2025, CRC approved standard reporting forms for the submission by undertakings of information on their activities relating to the provision of electronic communications networks and/or services.
- ✓ By Decision No. 352 of 27.11.2025, CRC adopted an opinion on a dispute under the Postal Services Act;
- ✓ By Decision No. 367 of 04.12.2025, CRC adopted an amendment and supplement to the General Requirements for the Provision of Public Electronic Communications;
- ✓ By Decision No. 365 of 04.12.2025, CRC adopted an amendment and supplement to the Functional Specifications for the Implementation of Number Portability for Nationally Significant Numbers from the National Numbering Plan;
- ✓ By Decision No. 371 of 11.12.2025, CRC amended Individual Licence No. 1-001-05/16.07.2020 for the provision of the universal postal service throughout the territory of the Republic of Bulgaria, issued to Bulgarian Posts EAD, by extending, for a further five years, the period during which the undertaking is designated to provide the universal postal service, with effect from 30.12.2025;
- ✓ By Decision No. 375 of 17.12.2025, CRC granted National Railway Infrastructure Company Permit No. 02663/17.12.2025 for the use of numbering resources, valid until 27.07.2029.
- ✓ By Decision No. 383 of 17.12.2025, CRC adopted a draft decision on the definition, analysis and assessment of the wholesale market for local access at a fixed location, to be submitted to the European Commission, the Body of European Regulators for Electronic Communications (BEREC), and the national regulatory authorities of the Member States of the European Union.

4. Disputes under the LEC:

Disputes under the LEC procedures concern interconnection and access under the LEC. In addition, in 2025, CRC considered and resolved disputes between the other operators and VIVACOM BULGARIA EAD and UNITED FIBER BULGARIA EOOD over the applicable prices for access to passive infrastructure, namely a duct network.

5. Provision of electronic communications

5.1. Authorisations for the use of individually assigned scarce resource

Table 15 lists the number of authorisations issued during the year for the use of scarce resource, the number of amendments and/or supplements to the authorisations issued, the number of authorisations terminated, revoked or transferred, and the number of authorisations expired.

Table 15

Authorisations for 2025 under the Law on Electronic Communications				
Electronic communications network	Amendments/Supplements (number)	Authorisations issued (number)	Terminated/Revoked/ Expired (number)	Transfers (incl. partial) / Lease (number)
Electronic communications networks for terrestrial digital broadcasting of television signals with national and local coverage	1	-	-	-
Electronic communications networks for terrestrial analogue broadcasting of radio signals with national and local coverage	183	-	2	2
Terrestrial networks in the 900 MHz frequency band	3	-	-	-
Terrestrial networks in the 2 GHz frequency band	3	-	-	-
Use of radio spectrum in the 26 GHz band	4	-	-	-

Electronic communications networks from a mobile radio service – PMR/PAMR	39*	41*	23	4
Electronic communications networks from a fixed radio service of the “point-to-point” type	19**	-	2	-
Authorisations for the use of numbering resources	10	1	-	-
Electronic communications networks from satellite radio services	16	-	4	-
Temporary authorisations	-	16*	-	-
TOTAL:	278	58	31	6

* The total number of assigned radio frequencies for these authorisations was 341;

** Amendments and supplements to the technical data of a total of 726 radio links, including assigned radio spectrum for new 1,424 links and removal of 428 links.

5.2. Notifications for the provision of public electronic communications networks and/or services

The activities related to the notifications submitted in 2025 for the provision of public electronic communications networks and/or services are presented in Table 16.

Table 16

Type of activity	2025 (number)
Processed notifications for provision of public electronic communications networks and/or services	60
Processed notifications for termination of the provision of public electronic communications	31
Issued certificates for entry in the Register	13
Undertakings entered in the Register	42
Undertakings deleted from the Register	34

5.3. Provision of electronic communications through radio equipment from the amateur radio service

The authorisations, certificates and licenses for radio amateur capacity issued during the year are presented in Table 17.

Table 17

Type of activity	2025 (number)
Issued authorisations for radio amateur capacity	444
Issued HAREC certificates	69
Issued CEPT licences	63
Assigned call signs	374

In 2025, 9 amateur radio exams were held in the cities of: Sofia, Plovdiv, Varna, and Gabrovo. 313 people were examined. In 2013, 374 call signs of amateur radio licences, amateur radio listeners and radio clubs, of which 65 are temporary call signs, were provided.

Following the latest amendments and supplements to the Rules for the Use of Radio Frequency Spectrum for Radio Equipment from the Amateur Radio Service, CRC reissued ex officio, during 2025, 806 authorisations for radio amateur capacity, 205 CEPT licences, 17 club call signs, 12 listener call signs, and 71 call signs for automatic amateur radio stations.

CRC and the Bulgarian Federation of Radio Amateurs (BFRA) reached an agreement to support municipalities in ensuring emergency communications in the event of disasters and emergencies. The two organisations signed a Memorandum of Understanding establishing a framework for cooperation between CRC and BFRA in support of their activities in the field of electronic communications, and in particular amateur radio activities.

5.4. Interconnection and access

In 2025, five procedures for the issuance of binding instructions in relation to the resolution of interconnection disputes, initiated in the previous year, were completed. Four of these procedures concerned excessive delays in the negotiation process - refusal to grand an access. In all four cases, CRC issued binding instructions requiring the undertakings to conclude an interconnection agreement. One of the requests received in 2024 concerned the imposition of penalties for the termination of traffic with manipulated Calling Line Identification (CLI). Following the establishment of the relevant facts and legal circumstances during the proceedings, CRC did not issue binding instructions.

In 2025, a request for the issuance of binding instructions was received regarding a refusal by an undertaking providing electronic communications services to grant virtual access to an optical electronic communications network. The request concerned a delay in the negotiations regarding the provision of an offer to the access-seeking undertaking. In this case, CRC issued binding instructions requiring the submission of an offer setting out the technical, financial and other relevant conditions necessary for the implementation of the requested access.

III. ACTIVITIES UNDER THE LAW ON ELECTRONIC COMMUNICATIONS, THE LAW ON ELECTRONIC DOCUMENT AND ELECTRONIC TRUST SERVICES, AND THE LAW ON ELECTRONIC COMMUNICATIONS NETWORKS AND PHYSICAL INFRASTRUCTURE

1. Activities in implementation of the CRC's priorities

1.1. Effective management of scarce resources

1.1.1. Radio spectrum

The radio spectrum is a limited and strategically important national resource that is of fundamental significance for the operation of wireless electronic communications networks, the modern state and its digital infrastructure. It forms the basis for the development of mobile and satellite networks, radio and television broadcasting, navigation systems, and other wireless applications. The rapid development of communications is a prerequisite both for the provision of a wide range of innovative services to end-users and for the performance of a number of social and economic activities. Due to its inherently limited nature and high public interest, the management of the radio spectrum should be carried out in accordance with the principles of efficiency, transparency, technological neutrality, and equal treatment. The optimal allocation and use of the spectrum is essential to ensure the sustainable development of electronic communications, to foster innovation, and to provide conditions for a competitive and predictable market environment. In the context of accelerated digitisation and the growing demand for high-quality wireless services, the radio spectrum has become a critical resource for economic growth, digital transformation, and the country's international competitiveness. Accordingly, one of the Commission's core responsibilities is to create the conditions for the efficient management of the radio spectrum and for the introduction and development of innovative wireless technologies and services. This is essential not only for the deployment and evolution of 5G and 6G networks, but also for the advancement of the increasingly widespread non-geostationary satellite communications.

In order to create prerequisites for achieving effective and efficient use of the frequency resource through harmonised allocation of the radio spectrum, the activity of introducing the new decisions of the European Commission (EC) into the Bulgarian legislation continued. CRC experts participated in the interdepartmental working group, which has the task to prepare a proposal for amendment and supplement of the National Radio Spectrum Allocation Plan in connection with the introduction of the decisions of the World Radiocommunication Conference held in 2023 (WRC-23) in the Bulgarian legislation. In 2025, the draft amendments to the National Radio Spectrum Allocation Plan were approved by the National Radio Spectrum Council following a public consultation procedure.

In 2025, the Regulatory Policy for the Management of Radio Spectrum for Civil Needs was adopted. Its primary objective is to ensure a favourable regulatory framework for the use of radio spectrum that supports the development of wireless communications, provides a predictable environment for the current and future use of radio spectrum, and enables spectrum to be used in a manner that delivers the greatest benefit to society. The Regulatory Policy sets out the principal objectives, mechanisms and approaches for the management of radio spectrum for civil needs for the period 2025-2027. It also includes a review of the use of radio spectrum for civil needs over the past three years across the various types of networks. Issues relating to forthcoming changes in European Union electronic communications policy and their implementation in Bulgaria were examined.

By Decision No. 130 of 27.03.2025, CRC adopted the results of the public consultation conducted on the draft Decree of the Council of Ministers amending and supplementing the Ordinance on the content, terms and procedure for keeping, maintaining and using the Register of transceiver stations of terrestrial networks, the activities under Article 151(1)(16) of the Spatial Development Act, and small-area wireless access points. As a result of the consultation procedure, the Council of Ministers adopted the Ordinance by Decree No. 183 of 12.09.2025. The amendments were introduced to the Information System that ensures the activities of registration of the transceiver stations of terrestrial networks capable of providing electronic communications services, the activities under Article 151(1)(16) Spatial Development Act, as well as the registration of small-area wireless access points, by upgrading its functionalities.

Allocation, planning, assignment and efficient use of the frequency spectrum

During the year, CRC adopted amendments to the Rules for Free Use of Radio Frequency Spectrum, the Rules for the Use of Radio Spectrum for Electronic Communications Networks from a Fixed Radio Service after the Issuance of an Authorisation, the Rules for the Use of Radio Spectrum for Production Purposes after the Issuance of an Authorisation, and the Rules for the Use of Radio Frequency Spectrum for Radio Equipment from the Amateur Radio Service.

With the amendment and supplement to the Rules for the Free Use of Radio Frequency Spectrum, the provisions of Electronic Communications Committee (ECC) decisions on the harmonised use of radio spectrum, as well as the provisions of the following EC decisions were transposed into the Bulgarian legislation:

- Commission Implementing Decision (EU) 2024/3157 of 17 December 2024 amending Implementing Decision (EU) 2021/1067 on the harmonised use of radio spectrum in the 5945–6425 MHz frequency band for the implementation of wireless access systems, including radio local area networks (WAS/RLANs).
- Commission Implementing Decision (EU) 2025/105 of 22 January 2025 amending Decision 2006/771/EC updating harmonised technical conditions in the area of radio spectrum use for short-range devices and repealing Implementing Decision 2014/641/EU on harmonised technical conditions of radio spectrum use by wireless audio programme making and special events (PMSE) equipment in the Union;
- Commission Implementing Decision (EU) 2025/650 of 26 March 2025 amending Implementing Decision (EU) 2018/1538 as regards the update of harmonised technical conditions for short-range devices within the 874–876 MHz and 915–921 MHz frequency bands;
- Commission Implementing Decision (EU) 2025/913 of 20 May 2025 amending Implementing Decision (EU) 2021/1067 as regards an update of technical conditions for the harmonised use of radio spectrum in the 5945–6425 MHz frequency band for the implementation of wireless access systems, including radio local area networks (WAS/RLANs).

The amendments to the Rules for Free Use of Radio Frequency Spectrum established harmonised technical conditions for the use of the 874–876 MHz and 915–921 MHz frequency bands through technically advanced radio frequency identification (RFID) solutions, as well as through Internet of Things (IoT) applications based on short-range network devices in data networks. The conditions for the use of radio spectrum by existing short-range applications, such as active implantable medical devices, radio frequency identification devices, non-specific devices, hearing aid devices, and others, were amended. The restrictions on the use of non-specific devices for voice and video applications were removed. Conditions for the use of radio spectrum by wireless audio programme making and special events equipment were introduced, and new frequency bands for radio determination devices were added.

The amendments to the Rules for Use of Radio Frequency Spectrum for Radio Equipment from the Amateur Radio Service introduced a 10-year validity period for individual amateur radio operator/club call signs, individual listener call signs, and call signs of amateur repeaters, radio beacons and other types of automatic fixed radio stations.

The amendments to the Rules for the Use of Radio Frequency Spectrum for Electronic Communications Networks from a Fixed Radio Service after Authorisation and the Rules for the Use of Radio Spectrum for Production Purposes after Authorisation refined certain provisions in order to update them in line with the recommendations of the ECC and the International Telecommunication Union (ITU), as well as with the applicable regulatory framework. The amendment also introduced an obligation to resolve issues arising from the operation of devices located in close proximity to one another by ensuring conditions for their mitigation and/or by discontinuing the operation of the device.

In line with the amendments of and supplements to the above regulations in the frequency information system of the European Communications Office - EFIS (ECO Frequency Information System), the data on the use of the frequency resource in the Republic of Bulgaria were updated, thus ensuring transparency in terms of allocation and use of the frequency resource in Bulgaria at international level.

Mobile radio service

The possibility of applying a flexible approach to the creation and configuration of networks from mobile radio service, such as PMR/PAMR networks, is the reason for their use both for large groups, mainly in the public sector (energy, transport, health, environmental protection, municipal voluntary formations, etc.), and also for small and medium-sized groups of users, mainly in the private sector (taxi, construction and security services, service providers, etc.). Depending on the objectives, hierarchically structured networks with local, regional or national coverage can be created.

Last year, there continued to be a growing interest in the use of radio spectrum for short-term events – concerts, sports events, and film and television production. A total of 11 authorisations were issued, with 153 radio frequencies granted.

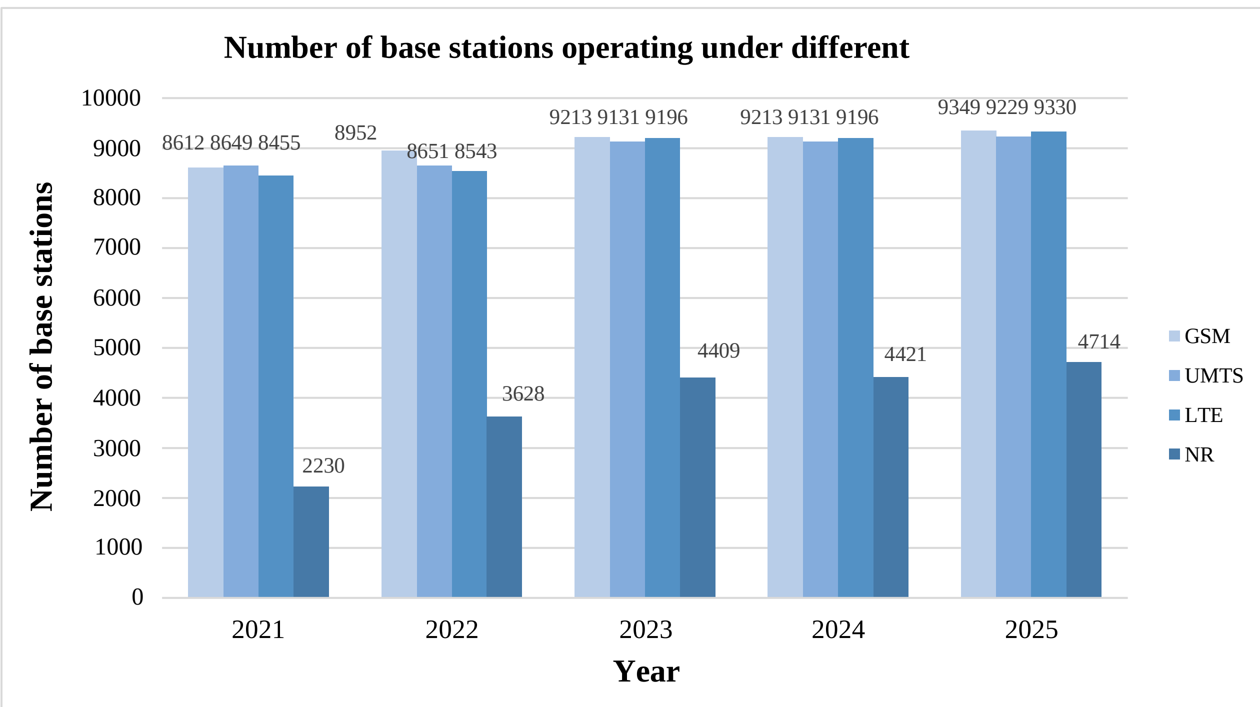
Demand for PMR/PAMR network frequency resource has been relatively constant in recent years. The interest of undertakings in Bulgaria is mainly focused on the use of radio spectrum for narrowband networks. The existing authorisations are mainly in the 160 MHz and 460 MHz bands, the least being in the 80 MHz band, whereas in the other bands the number of authorisations is fairly evenly distributed.

In 2025, the Register of transceiver stations of terrestrial networks and small-area wireless access points continued to operate as an electronic system for the submission, processing and tracking of applications related to the registration of transceiver stations, the activities under Article 151(1)(16) of the Spatial Development Act, and notifications for the deployment of small-area wireless access points. The system also includes a public section through which citizens and stakeholders can access basic data on registered base stations and wireless access points, thereby contributing to greater transparency and awareness.

During the year, 144 new transceiver stations were entered, 761 were changed, and 40 were removed from the Register. With regard to small-area wireless access points, 66 new points were entered, 72 were changed, and 5 were removed.

In order to ensure compliance with the restrictions applicable to Sanitary Zone 1, which constitutes a protected area around military radar and navigation facilities where restrictions are imposed on the parameters and deployment of radio equipment in order to prevent interference with defence systems, CRC carried out inspections in 2025 in accordance with the Procedure for Interaction between the Air Force, undertakings providing electronic communications networks and/or services, and CRC. The locations of 28 base stations were inspected, and 25 base stations of terrestrial networks using radio spectrum in the 700 MHz and 800 MHz bands were put into operation following verification against the results of the inspections.

As it is clear from the chart presented in Figure 40, the deployment of the fifth generation (New Radio (NR) networks in the period 2021-2025 stands out as the most dynamic process in the development of mobile infrastructure. While the number of base stations in networks based on GSM, UMTS and LTE technologies is gradually increasing, maintaining a stable growth rate, fifth-generation networks are expanding at a faster pace. This trend indicates that operators are moving towards network modernisation and the prioritised development of services based on fifth-generation technology.



Source: CRC

Figure

Fixed radio service

In 2025, amendments and supplements were made to 19 authorisations for the use of radio spectrum, for the provision of electronic communications via electronic communications network of the point-to-point type concerning the technical data of a total of 2,150 radio relay links (RRLs). They assigned radio spectrum for 1,424 new links, and so their total number reached 23,252, up by 7% year-on-year.

In 2025, the highest number of newly established links was registered in the 23 GHz band, unlike in 2024, when the largest number of newly established links was recorded in the 18 GHz band. The highest annual percentage increase, of nearly 26.5%, was recorded in the 11 GHz band. Immediately thereafter, the 23 GHz band ranked second in terms of the increase in the number of new RRLs, with a growth rate of 22%. The number of RRLs in the 13 GHz, 18 GHz and 23 GHz bands made up 68% of all authorised RRLs. These are the bands that are preferred by undertakings for the development of networks on the territory of Bulgaria.

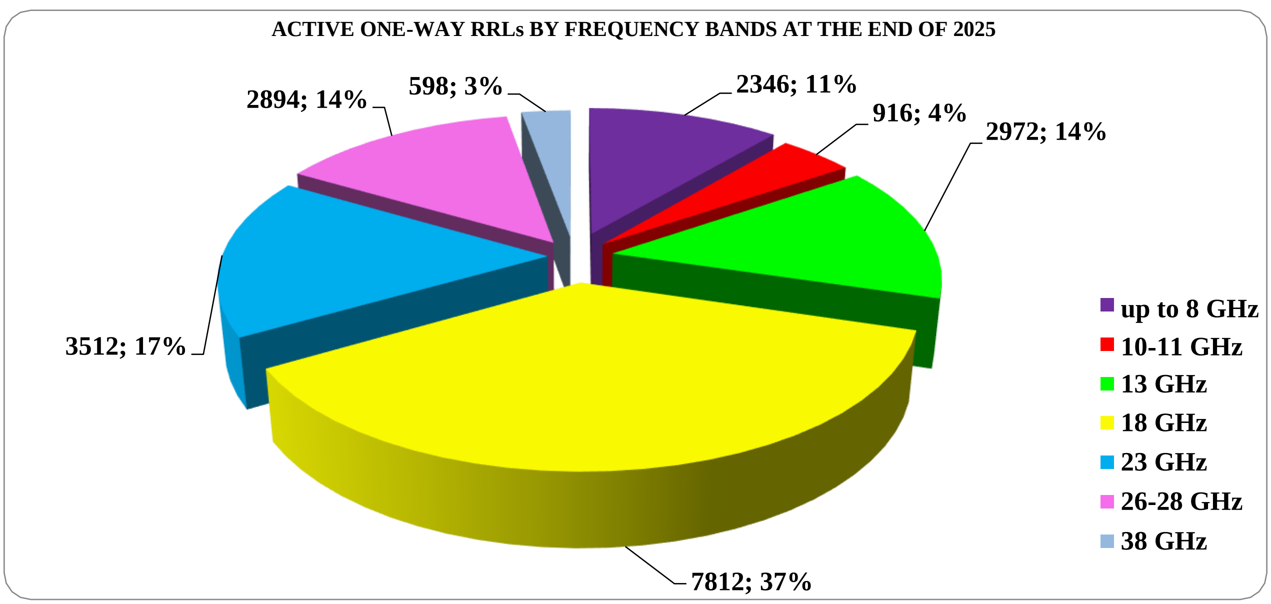
A reduction in the total RRLs in the 8 GHz and 38 GHz bands was reported, by approximately 11%. The links in the 38 GHz band migrated to 76 GHz/86 GHz bands due to the specific technical parameters of the RRLs and the increased capacity of the information transmitted.

As of 31 December 2025, a total of 2,202 one-way RRLs were registered in the electronic system for registration of the granted rights for the use of radio spectrum in the 71-76 GHz and 81-86 GHz bands, of which 60 use XPIC/CCDP technologies. The number of RRLs rose by 10%.

For the reporting period, the following were considered:

- 7 applications for the registration of 201 links;
- 6 applications for the deregistration of 75 links;
- 2 applications for changes to 5 links.

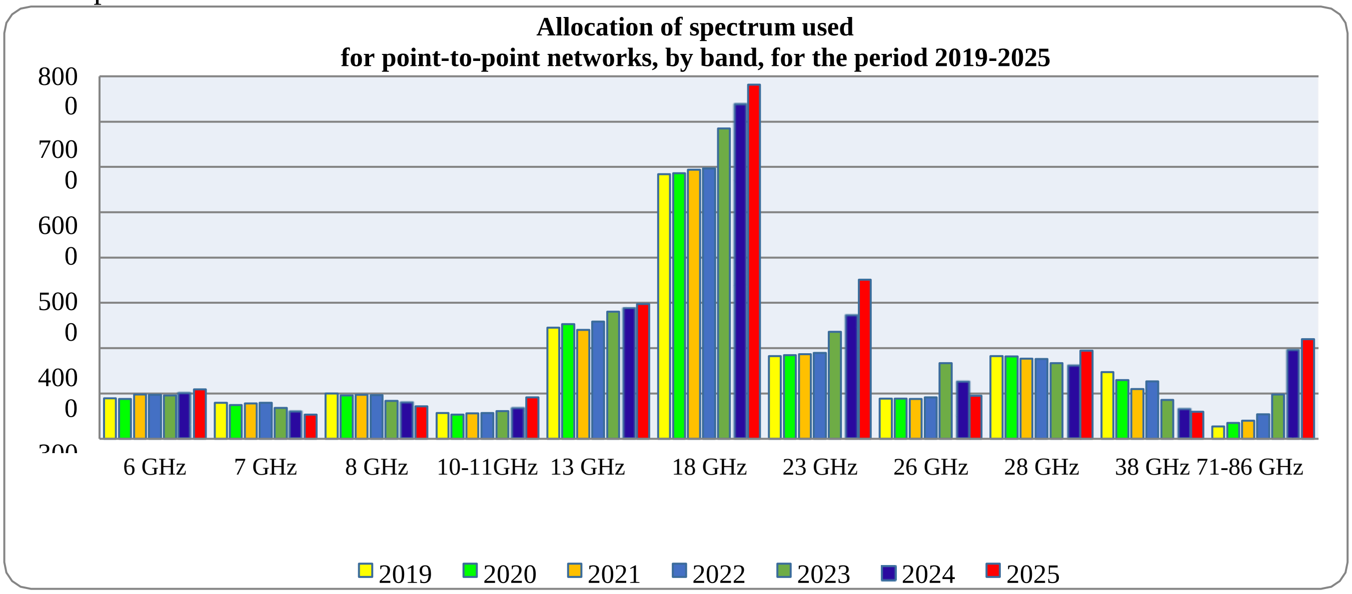
Figure 41 presents information on the share distribution of the active RRLs by radio frequency band assigned with authorisations for the use of radio spectrum, for electronic communications network of the point-to-point type, at the end of 2025, by percentage.



Source: CRC

Figure 41

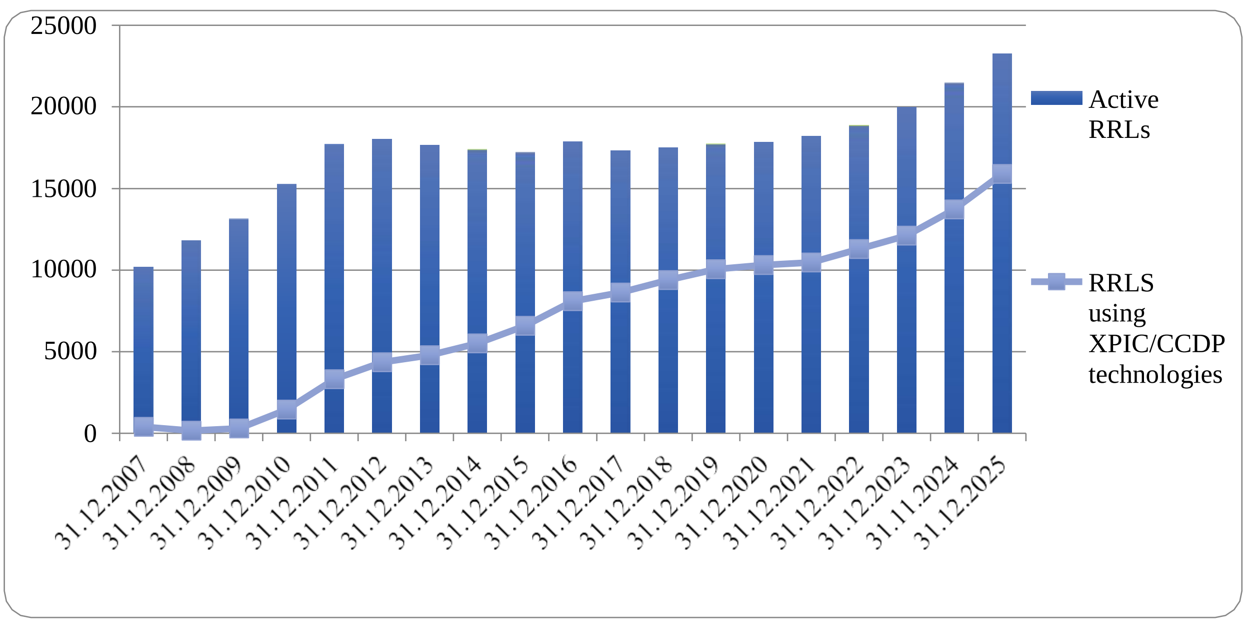
Figure 42 presents the allocation of spectrum used for point-to-point networks, by band, for the period 2019-2025.



Source: CRC

Figure 42

Figure 43 displays the active RRLs by year, compared with the part of them which uses XPIC/CCDP technologies.



Source: CRC

Figure 43

With the development of 5G networks and the offering of new services, there is a need to increase the transmission capacities. Therefore, in 2025, the number of RRLs using technical solutions for higher data transmission speeds increased, e.g.:

- using two radio frequency bands in one direction (band channel aggregation (BCA) or super dual band (SDB));
- using two adjacent channels in one direction (channel aggregation (CA));
- using both polarisations in a single RRL (cross-polar interference canceller/co-channel dual polarisation (XPIC/CCDP)).

The trend towards migration of the RRLs with a bandwidth of 3.5 MHz, 7 MHz, and 14 MHz to 28 MHz, 56 MHz, and 112 MHz bands was maintained. The number of links using XPIC/CCDP technologies reached 15,892 in 2025 (compared with 13,724 in 2024). The amendments to the authorisations reflect the increased need of undertakings to use higher transmission capacity, which in turn leads to an increase in the frequency band used in the various directions.

The radio relay network can be defined as supporting and complementing other networks providing electronic services. There is a constant development of radio relay networks of operators, and modern equipment is aimed at using new technologies to ensure high-speed connectivity of all types of networks through the use of less energy resources with better technical characteristics.

Satellite radio services

In 2025, the activities related to the regulation of satellite radio services continued to focus on coordinating and protecting the national positions on the geostationary orbit with the relevant radio spectrum and the radio spectrum used by non-geostationary satellite systems. The purpose of this process is to prevent potential interference with both Bulgarian geostationary and non-geostationary satellite systems, as well as with existing terrestrial networks within the territory of Bulgaria.

In 2025, one Advance Publication Information (API) filing, one modification filing and one notification filing for Bulgarian non-geostationary satellite systems were submitted.

Non-geostationary satellite networks are developing at an exceptionally rapid pace and represent one of the most significant technological developments in the field of electronic communications worldwide in recent years. Their rapid expansion is accompanied by increased requirements for the management of radio spectrum and orbital resources, owing to the need to coordinate multiple operators, prevent harmful interference and ensure the sustainable use of the orbital environment. Ensuring favourable conditions for the development of non-geostationary satellite networks is of strategic importance to Bulgaria, as these networks provide connectivity in remote and hard-to-reach areas, enhance the resilience of communications systems during emergencies and natural disasters, and support the development of innovative value-added services, including broadband Internet access, IoT services, mobile communications, and specialised applications for industry and transport.

In 2025, Bulgaria also witnessed an increase in the number of earth stations and the non-geostationary satellite systems with which they communicate. Four temporary authorisations were issued and 16 authorisations for the use of radio spectrum for electronic communications networks of satellite radiocommunication services were amended, providing spectrum for communication with 44 satellite systems.

The coordination activities continued through analyses of the biweekly circulars (BR

International Frequency Information Circular - BRIFIC) issued by the Radiocommunication Bureau of the ITU. As a result of the analyses of all biweekly circulars for 2025, the relevant objections were sent in view of performing the regulatory functions of CRC in terms of the efficient use and effective management of the radio spectrum.

In addition, an analysis was also made of the proposals received from other administrations to conclude agreements with a view to the successful coordination of the Bulgarian satellite systems.

Broadcasting

In 2025, with regard to a request of the Council for Electronic Media (CEM) for the assignment of free frequency resource to 2 cities concerning open procedures to hold competitions, technical analysis and frequency planning were performed for the assignment of frequency resources and the relevant technical parameters (admissible capacities, points of broadcasting as well as other technical information). In compliance with the provisions of the LEC, CEM was provided with information on the availability of frequency resource needed for terrestrial analogue broadcasting of radio programmes for the territory of the cities of Burgas and Sliven.

At the request of one of the national undertakings, preliminary technical inspection for 33 frequency assignments was carried out.

In 2025, a total of 25 technical parameters of electronic communications networks for terrestrial analogue broadcasting of radio signals in the VHF band (87.5-108.0 MHz frequency band) were examined and analysed, of which 12 were of undertakings authorised to use radio spectrum from electronic communications network for terrestrial analogue broadcasting with national coverage, and 13 were of undertakings authorised to use radio spectrum from electronic communications network for terrestrial analogue broadcasting with local coverage.

In connection with an authorisation for use of radio spectrum from the electronic communications network for terrestrial digital broadcasting of VIVACOM BULGARIA EAD, the technical parameters relating to the addition of one station were examined and analysed.

One temporary authorisation was issued for a short-term event (to facilitate audio coverage of an event commentary) for the use of two frequencies in the UHF band (470.0–694.0 MHz).

Five online working meetings were held with experts from foreign administrations to carry out the preliminary international coordination of Bulgarian and foreign frequency assignments in the broadcasting frequency bands.

National and international coordination

In 2025, in the Advisory Council for National Coordination and Agreement to CRC, 2,161 radio frequencies and frequency bands were coordinated and agreed. National coordination and agreement with all state authorities, departments and agencies concerned is carried out with the goal to ensure the aeronautical and maritime safety, the protection of national security, and the efficient use of radio spectrum.

In connection with the international coordination of terrestrial networks, requests were sent to the Radio Communications Bureau for the addition of 3 radio frequency assignments of Bulgarian VHF radio stations under the terms of the Regional Agreement relating to the use of the band 87.5-108.0 MHz for VHF (FM) sound broadcasting, Geneva, 1984 (Geneva 1984).

For the purposes of preliminary international coordination in accordance with the provisions of the Geneva Agreement (1984), 621 Bulgarian VHF frequency assignments were processed and submitted.

Based on letters received from other administrations, international coordination of 7 radio frequency assignments with the appropriate technical parameters was carried out, in accordance with the Regional Agreement relating to the use of the band 87.5-108.0 MHz for VHF (FM) sound broadcasting, Geneva, 1984 (Geneva 1984).

As a result of the processed and analysed publications in the biweekly BRIFIC circulars for terrestrial radio services, over the past year, 1,774 radio frequency assignments to foreign administrations with their respective technical parameters were coordinated under the terms of the Regional Agreement relating to the use of the band 87.5-108.0 MHz for VHF (FM) sound broadcasting, Geneva, 1984.

In accordance with the terms of the Regional Agreement on the introduction of terrestrial digital radio and television broadcasting in the bands 174-230 MHz and 470-862 MHz (Geneva 2006), five radio frequency assignments to foreign administrations were analysed and coordinated to amend the GE06D digital plan with the relevant technical parameters.

For the purposes of preliminary international coordination under the provisions of the 2006 Geneva Agreement (GE06), 263 frequency assignments submitted by foreign administrations were analysed.

In accordance with the procedures under Art. 12 of the ITU Radio Regulations, 207 (108 in season A and 99 in season B) frequency assignments for terrestrial analogue and digital broadcasting of radio signals within the short-wave bands were coordinated.

Radio frequency assignments for satellite networks from the biweekly BRIFIC circulars for satellite radio services were processed and analysed. In order to ensure protection from radio interference of the Bulgarian positions on geostationary and non-geostationary orbits and fixed radio service assignments, CRC sent to ITU and to the administrations whose satellite networks could potentially affect the Bulgarian networks, 93 written objections and 190 objections submitted via specialised software products, as follows:

Written objections

- in coordination of satellite networks from the fixed-satellite radio service emitting in space-to-Earth direction and a possible interference to the feeder link of a satellite from the broadcasting-satellite radio service, pursuant to Article 7 of Appendix 30A of the Radio Regulations – 4 objections;
- coordination between a satellite network on planned position from the broadcasting-satellite radio service and non-planned satellite network, pursuant to Article 7 of Appendix 30 of the Radio Regulations – 6 objections;
- comments under Article 9.3 of the Radio Regulations on planned satellite systems on non-geostationary orbits - 79 written notifications were sent to the respective administrations;
- coordination of non-planned satellite station potentially affecting another non-planned satellite station, pursuant to Article 9.7 of the Radio Regulations - 4 objections;

Objections submitted via specialised ITU applications

- comments under Article 9.3 of the Radio Regulations on planned satellite systems on non-geostationary orbits - for 102 satellite systems, and written notifications to the respective administrations were sent;
- coordination of satellite station using non-geostationary orbit and satellite system on

geostationary orbit, pursuant to Article 9.12A of the Radio Regulations – objections were made for 20 satellite systems;

- coordination of satellite station using geostationary orbit and satellite system on non-geostationary orbit, pursuant to Article 9.13 of the Radio Regulations – objections were made for 47 satellite systems;
- coordination of emitting satellite station and receiving station from fixed radio service included in the table of frequency assignments, pursuant to Article 9.14 of the Radio Regulations – objections were made for 21 satellite systems.

Electromagnetic compatibility

During the year, electromagnetic compatibility analyses of 21 Bulgarian and 41 foreign VHF radio broadcasting stations with the aeronautical systems ILS, VOR and COM were carried out.

Due to the identified possible interference while carrying out analysis for electromagnetic compatibility with aeronautical radio services, 3 radio frequency assignments were submitted for measurement under the Methodology for measuring A1 type intermodulation products generated by the operation of closely situated VHF-FM radio transmitting stations.

1.1.2. Numbering resources

At the end of 2025, the total number of undertakings authorised to use numbering resources was 23.

During the year, one authorisation for the use of numbering resources was issued to the National Railway Infrastructure Company.

In 2025, 10,000 geographic numbers and 10,000 nationally significant numbers were assigned for use in the provision of electronic communications for the undertaking's own operational needs via a GSM-R electronic communications network from a mobile radio service. The number 116016 – "Helpline for victims of violence against women" – was allocated for use to the Administration of the Council of Ministers.

The total number of geographic numbers assigned at the end of the year was 8,230,500.

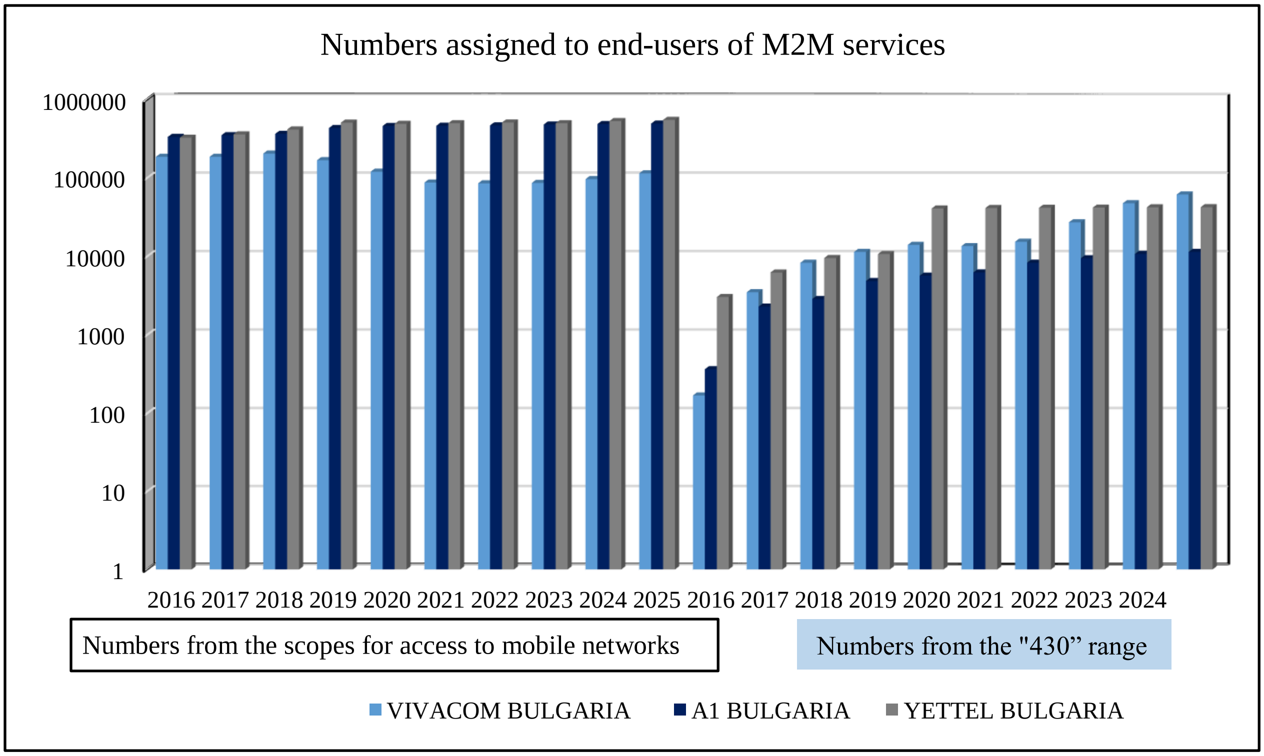
Due to optimisation of the undertakings' networks and services in 2025, the following numbering resources were released:

- 257,500 geographic numbers;
- 1,800 numbers from the "90" range;
- 1 code for the "carrier selection" service.

The numbering resource within the "430" range – for access to services using Machine-to-Machine (M2M) communication - was assigned to three undertakings:

- A1 Bulgaria EAD (A1 BULGARIA);
- Vivacom Bulgaria EAD (VIVACOM BULGARIA);
- Yettel Bulgaria EAD (YETTEL BULGARIA).

In 2025, a slight increase was reported for all three undertakings in the numbers within the "430" range assigned to end-users. The trend of using more numbers from the mobile network access ranges in the provision of M2M services continued.



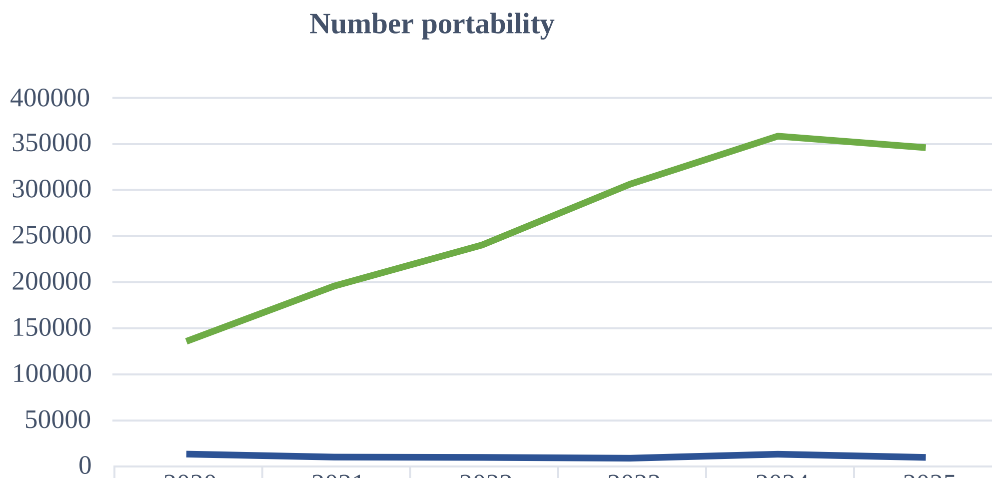
Source: CRC

Figure 44

Number portability

In 2025, a decrease was observed, compared with 2024, in the number of end-users who took advantage of their right to retain the number used when changing the mobile or fixed service provider.

The trend for the porting of more numbers in mobile networks than numbers in fixed networks was preserved. Data on numbers ported over the last six years are presented in the following figure:



	2020	2021	2022	2023	2024	2025
fixed	13512	10405	10002	9041	13372	10060
mobile	135852	195718	240397	306338	358480	346150

Source: CRC

Figure 45

Electronic trust services

Pursuant to Article 32 of the Law on Electronic Document and Electronic Trust Services (LEDETS), the Communications Regulation Commission is the national supervisory authority in the field of electronic trust services, exercising the powers conferred under Article 46b of Regulation (EU) 910/2014,[44] as amended by Regulation (EU) 2024/1183.[45]. CRC maintains an up-to-date national trusted list that contains information on the qualified trust services providers and on the services they provide.

The qualified trust service providers entered by the Communications Regulation Commission in the national trusted list are BORICA AD, Evrotrust Technologies JSC, InfoNotary PLC, Information Services PLC and iDocs Bulgaria EOOD.

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[44] Regulation (EU) 910/2014 of the European Parliament and of the Council on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC.

[45] Regulation (EU) 2024/1183 of the European Parliament and of the Council of 11 April 2024 amending Regulation (EU) 910/2014 as regards the establishment of a European Digital Identity Framework

In 2025, a new qualified electronic registered delivery service provided by BORICA AD was entered in the national trusted list.

During the reporting period, the qualified trust service providers BORICA AD, Evrotrust Technologies JSC, InfoNotary PLC and Information Services PLC underwent conformity assessment audits. Following its analysis of the audit reports submitted, CRC confirmed both the qualified status of the providers and of the trust services they provide.

In 2025, a significant increase was observed in the provision of trust services. The number of qualified certificates for qualified electronic signature issued increased by 41% compared with the previous year, while the number of qualified certificates for qualified electronic seal grew by 70% compared with 2024. The number of qualified electronic time stamps rose by 14%. A substantial increase was also recorded in the use of qualified electronic signature/seal validation and preservation services.

Summarised data on the trust services provided in the last four years is presented in Table 18.

Table 18

Trust service	2022	2023	2024	2025
	Number	Number	Number	Number
Issued qualified certificates for electronic signature	**1,395,881**	**1,888,322**	**2,870,764**	**4,055,373**
Issued qualified certificates for electronic seal	**189**	**267**	**406**	**692**
Issued qualified electronic time stamps	**526,426,850**	**855,553,914**	**1,068,614,164**	**1,218,268,895**
Issued qualified certificates for website authentication	**318**	**309**	**298**	**321**
Issued electronic evidence for qualified validation of electronic signature/seal	**2,399,804**	**2,138,936**	**956,332**	**2,416,936**
Qualified electronic preservation service for signature/seal	**189,864**	**223,010**	**241,098**	**405,572**
Issued electronic evidence of a qualified electronic registered delivery service	**503,163**	**861,461**	**625,127**	**681,732**

1.2. Regulation and monitoring of the electronic communications markets

One of the CRC's strategic objectives for the period 2025–2028 is to promote a sustainable competitive market and to ensure the protection of consumers. In 2025, CRC continued its efforts towards achieving this objective by monitoring and analysing the competitive environment in the electronic communications networks and services markets in order to determine whether regulatory intervention was required, in accordance with its statutory powers.

1.2.1. Regulation of the electronic communications markets

In 2025, CRC continued its work on the fourth round of analysis of the wholesale market for local access. The reporting data provided for 2024 by undertakings that notified the Commission of their intentions to provide public electronic communications and entered as of December 31, 2024 in the public register under Art. 33, para. 1, item 1 of the Electronic Communications Act (ECA) were processed and validated.

In accordance with the provisions of the European Commission Recommendation on relevant markets susceptible to ex ante regulation[46] and the CRC Methodology for Market Analyses[47], a draft for definition, analysis and assessment of the wholesale market for local access at a fixed location was prepared. By Decision No. 258 of 14.08.2025, CRC initiated a public consultation on the draft prepared. Following the opinions received during the public consultation, CRC introduced substantial amendments to the initial draft market analysis and, by Decision No. 316 of 23.10.2025, initiated a new public consultation on the revised draft market analysis.

By Decision No. 383 of 17.12.2025, CRC adopted the results of the new public consultation held in accordance with Decision No. 316 of 23.10.2025 of CRC on the draft decision on the definition, analysis and assessment of the wholesale market for local access at a fixed location, which was submitted to the European Commission, the Body of European Regulators for Electronic Communications (BEREC), and the national regulatory authorities of the Member States of the European Union.

1.2.2. Monitoring of the electronic communications market

In accordance with Article 40 LEC, as well as Article 15 of the Methodology for the terms and procedures of relevant markets definition, analysis and assessment (the Methodology), CRC regularly collects information from the undertakings providing electronic communications on the basis of a set of parameters for which data is collected by means of special-purpose questionnaires. By Decision No. 341 of 21.11.2024, CRC approved the sample forms and the instructions to them concerning Annual reports of undertakings’ activity in the provision of public electronic communications in 2025.

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[46] *Commission Recommendation (EU) 2020/2245 of 18 December 2020 on relevant product and service markets within the electronic communications sector susceptible to ex ante regulation in accordance with Directive (EU) 2018/1972 of the European Parliament and of the Council establishing the European Electronic Communications Code.*

[47] *Methodology for the terms and procedure of relevant markets definition, analysis and assessment, and criteria for designating undertakings with significant market power (prom. SG, no. 89 of 13.11.2012, in force as of 13.11.2012, amended and supplemented, SG, no. 101 of 07.12.2018, last amended and supplemented, SG, no. 2 of 07.01.2022)*

1.3. Development and technical support of the National Radio Spectrum Monitoring System

In 2025, the development of the National Radio Spectrum Monitoring System (NRSMS) under the Development Plan for the period 2021-2025 continued. Four (4) fixed remote-controlled radio monitoring stations of the "*compact systems*" type were delivered; they are intended for radio monitoring on the territory of the cities of Ruse, Vratsa, Smolyan, and Kardzhali in the frequency range from 20 MHz to 6 GHz. One (1) mobile radio monitoring station in the range from 20 MHz to 26.5 GHz, intended for radio monitoring in the region of Central South Bulgaria, was put into operation. One (1) mobile station with a dedicated system for coverage and quality measurements of the mobile services provided by the terrestrial GSM/UMTS/LTE/5G networks, intended for measurements in the region of Central South Bulgaria, was also put into operation. Seven (7) operating fixed stations from the NRSMS were upgraded: Sofia 1 Fixed Station; Sofia 2 Remote-Controlled Station; Blagoevgrad Remote-Controlled Station; Plovdiv 1 Remote-Controlled Station; Razgrad Remote-Controlled Station; Pleven Remote-Controlled Station; and Vidin Remote-Controlled Station, with their radio monitoring capabilities further enhanced.

To ensure the control and monitoring activities of electronic communications networks using radio spectrum, activities related to technical maintenance of the dedicated technological equipment of fixed and mobile radio monitoring stations, as well as of the portable dedicated measuring equipment of the NRSMS, were regularly carried out.

At the end of 2025, CRC had the following principal measurement systems at its disposal for the performance of its supervisory functions:

- 36 (thirty-six) fixed stations for radio spectrum monitoring, of which 1 (one) manned and 35 (thirty-five) unmanned remote-controlled stations, of which: 8 (eight) in the bands from 20 MHz to 3000 MHz and 28 (twenty-eight) in the bands from 20 MHz to 6000 MHz;
- 1 (one) mobile station for radio monitoring, detection and localisation of radio interference in the bands from 20 MHz to 6 GHz;
- 6 (six) mobile stations for radio monitoring in the bands from 20 MHz to 26.5 GHz;
- 3 (three) mobile stations for radio monitoring, detection and localisation of radio interference in the bands from 20 MHz to 6 GHz and measurements of the coverage and quality of mobile services provided over terrestrial GSM/UMTS/LTE/5G networks;
- 2 (two) dedicated mobile stations for measurements of the coverage and quality of mobile services provided over terrestrial GSM/UMTS/LTE/5G networks;
- 1 (one) portable system for measurement of the coverage and quality of services provided over GSM/UMTS/LTE/5G networks;
- 6 (six) portable measurement systems for measurement of the coverage and quality of the DVB-T networks;
- 5 (five) portable measurement systems in the bands from 9 GHz to 26.5 GHz;

- 2 (two) portable measurement systems for measurement in the bands from 10 kHz to 3 GHz;
- 14 (fourteen) portable measurement systems:
  - 4 (four) systems in the bands from 8 kHz to 8 GHz;
  - 7 (seven) systems in the bands from 9 kHz to 20 GHz;
  - 3 (three) systems in the bands from 20 MHz to 31 GHz;
  - 4 (four) systems in the bands from 680 MHz to 32 GHz.

The future development of NRSMS is aimed at further expanding the functional and technological capabilities of the radio monitoring system in the following aspects:

1. Enabling the efficient and interference-free use of radio spectrum by lawful users, preventing the illegal use of spectrum and controlling the quality of services provided to end-users.
2. Construction of new fixed radio monitoring stations of the "*compact systems*" type in order to ensure greater territorial coverage of the country and efficient regular monitoring by the Commission of higher frequency ranges.
3. Providing systems for measurement of the coverage and quality of mobile networks in connection with the use of new frequency bands and 5G networks in the Republic of Bulgaria.
4. Enabling the control of the quality of services provided via terrestrial digital broadcasting, as well as preventing the illegal distribution of digital radio and TV programmes.

The funds provided in 2025 contributed to the partial development of the NRSMS and the expansion of the territorial and frequency coverage of the performed radio spectrum monitoring for civil needs, thus increasing the efficiency of the Commission's control over electronic communications networks using radio spectrum. The development of a modern and efficient radio spectrum monitoring system for civil needs is an ongoing process that requires substantial further investment in its development and maintenance.

1.4. Construction of a laboratory for electromagnetic compatibility

In 2025, the construction of a building and deployment of a specialised laboratory for electromagnetic compatibility (EMC) with anechoic chamber and shielded working premises according to the issued Building Permit under the Spatial Development Act (SDA) and approved Detailed Design continued.

In connection with the construction of the EMC Laboratory, a Record of Acceptance of the completed construction and installation works (Standard Form Act No. 15 of 10.10.2025) was signed, and the final report on the suitability of the completed stage of the construction works for commissioning was prepared in accordance with Article 168(6) SDA.

The laboratory also entered the equipment phase, with measuring instruments for a robotic system for automated SAR measurements delivered and installed.

The construction of the EMC Laboratory, together with the delivered equipment for measuring radiated spurious emissions from wireless devices in anechoic or semi-anechoic chambers up to 40 GHz, will expand the CRC's capabilities for monitoring radio equipment and transmitting devices placed on the market and in operation, which will insure the implementation of:

- Directive 2014/53/EU of the European Parliament and of the Council of 16 April 2014 on the harmonisation of the laws of the Member States relating to the making available on the market of radio equipment and repealing Directive 1999/5/EC;

- Directive 2014/30/EU of the European Parliament and of the Council of 26 February 2014 on the harmonisation of the laws of the Member States relating to electromagnetic compatibility (EMC).

1.5. International activity of CRC in 2025

In 2025, the CRC continued to strengthen international cooperation through its active participation in the work of specialised organisations in the fields of electronic communications and postal services at global, European and regional level. As a result, good regulatory practices were promoted, the exchange of expertise was further enhanced, and the effective functioning of the internal market for electronic communications networks and services was supported.

Participation in the work of European institutions

In 2025, with a view to protecting the national interest, CRC maintained active interaction with the European institutions, ensuring the consistent and coordinated representation of the national position on matters relating to EU legislation, including in its capacity as the Digital Services Coordinator and in connection with the implementation of the DSA.

Throughout the year, CRC continued its active participation, at both management and expert level, in the work of the Independent Regulators Group (IRG) and the Body of European Regulators for Electronic Communications (BEREC), thereby contributing to the development and implementation of common regulatory approaches. At the meetings of the IRG General Assembly, the BEREC Plenary Meetings and the Contact Network held during the year, a number of documents implementing the BEREC Work Programme 2025, with a direct bearing on the CRC's activities, were discussed and adopted. The most significant of these include:

- BEREC Report on the development of private and public 5G networks in Europe;
- BEREC Report on the update of Criterion 3 of the BEREC Guidelines on Very High Capacity Networks (VHCN);
- BEREC Report on progress in the copper switch-off process;
- BEREC Report on infrastructure sharing as a means of enhancing the environmental sustainability of electronic communications networks and services;
- Summary Report of the BEREC Internal Workshop on the switch-off of 2G and 3G networks;
- Summary Report of the BEREC External Workshop on practical issues preventing number misuse and potential fraudulent activities arising from the impact of new technologies;

- BEREC Report on the implementation of the Open Internet Regulation;
- Summary Report of the BEREC Internal Workshop on direct-to-device satellite connectivity;
- Summary Report of the BEREC External Workshop on the environmental footprint of satellite constellations.

The third BEREC Plenary Meeting and the IRG General Assembly of the year were held in Sofia in October, with the CRC serving as host of the events.

In addition, during the reporting period, the Commission participated in two Plenary Meetings of the European Regulators Group for Postal Services (ERGP) and all Contact Network meetings. The most important documents adopted during the ERGP meetings are as follows:

- ERGP Medium-Term Strategy 2026–2028

  The ERGP Medium-Term Strategy for the period 2026–2028 identifies three key strategic pillars which, as in previous years, must be further developed:

  - ✓ Strategic Pillar I – Shaping the regulatory framework for the future postal sector;
  - ✓ Strategic Pillar II – Promoting a competitive and dynamic EU single postal market;
  - ✓ Strategic Pillar III – Empowering end-users and ensuring a universal service obligation that meets consumers' evolving needs.

While continuing its work under Strategic Pillars I, II and III, ERGP will focus on providing proactive and forward-looking support, as well as targeted advice to the European Commission, in line with its mandate and the positions adopted by the ERGP regarding changes to the regulatory framework for postal services.

A horizontal axis is included alongside the three strategic pillars, focusing the analysis of key horizontal issues that have a significant impact on the postal sector, in particular sustainability, security, artificial intelligence and environmental sustainability.

The ERGP is expected to carry out the tasks under the three strategic pillars in the most effective manner.

- ERGP Work Programme 2026, Report on the public consultation on the draft ERGP Work Programme 2026 and brief project tasks of the working sub-groups for 2026.

The draft ERGP Work Programme 2026 follows the objectives set out in the ERGP Medium-Term Strategy for the period 2026–2028. It achieves a balanced distribution of tasks across the three strategic pillars, while continuing the work initiated in previous years on the review of the regulatory framework, environmental sustainability, digitalisation and changes in consumer needs.

- Report on technological developments and environmentally sustainable solutions in the postal sector;
- Report on the financing of the universal postal service obligation;
- ERGP Report on key performance indicators for monitoring the European postal services market;
- ERGP Report on quality of service;
- ERGP Report on quality of service standards;

- ERGP Report on outlining the future regulatory framework;
- ERGP Report on postal services prices;
- ERGP Report on the delivery ecosystem – technological value chains and new business models.

CRC participated both virtually and in person in the regular meetings of the General Assembly of the European Telecommunications Standards Institute (ETSI), held in April and November, as well as in the meetings of the ETSI National Standards Organisations Group (NSOG) and the National Standards Bodies Group (NSBG). During these meetings, decisions were discussed and adopted concerning the effective functioning of the Institute, as well as measures supporting the work of NSOG in fulfilling their national-level obligations related to the adoption of European standards as national standards and the approval and voting procedures concerning the European Commission's requests for the development of harmonised standards.

Experts took part in a workshop organised by ETSI and CEN on the latest standards in relation to Regulation (EU) 2024/1183 of the European Parliament and of the Council of 11 April 2024 amending Regulation (EU) 910/2014 on the establishment of a European digital identity framework.

With its active participation in the work of BEREC and ERGP, CRC contributed to the preparation and adoption of a number of documents in implementation of the European Electronic Communications Code (EECC).

In 2025, in its capacity as the Digital Services Coordinator (DSC) for Bulgaria, CRC continued to actively perform its functions related to the implementation of the DSA, further strengthening its participation in the cooperation mechanisms at European level. Representatives of the Commission participated in regular meetings of the European Board for Digital Services and took part in the activities of its working groups, within issues related to the effective implementation of the Regulation were discussed, including the supervision of online platforms and coordination between national authorities.

During the reporting period, CRC took steps to build internal capacity and organisational readiness to exercise its powers, as well as to improve cooperation with the competent national institutions. On 6 November 2025, the National Assembly adopted the Law amending and supplementing the Law on Electronic Communications (LAS LEC), which ensured the full implementation of the requirements of the DSA. Under the adopted amendments, in addition to CRC, the Council for Electronic Media (CEM) – with regard to video-sharing platform services – and the Commission for Personal Data Protection (CPDP) – with regard to the processing of personal data by providers of intermediary services – were designated as competent authorities under the DSA in Bulgaria.

Experts from CRC, in its capacity as the authority responsible for supervising trust service providers in the Republic of Bulgaria and for establishing, maintaining and publishing the national trusted list, participated in working meetings of the Forum of European Supervisory Authorities for Trust Service Providers, as well as in the joint 25th and 26th meetings of the Expert Group of the European Union Agency for Cybersecurity (ENISA) – ENISA ECATS EG.

The supervisory authorities were informed of the European Commission's decision regarding the forthcoming coordinated transition to a new version of the trusted lists across all Member States. Following this change, it will be possible to include the new trust services introduced under eIDAS 2 in the trusted lists.

CRC experts participated in the Trust Services and eID Forum and the international expert forum CA-Day (Certification Authority Day). These forums play a key role in facilitating the coordination among the EU Member States, the European Commission and trust service providers. The topics discussed focused on approaches to the implementation of eIDAS 2 and its related implementing acts.

CRC also participated in the meetings of the Radio Spectrum Policy Group (RSPG) throughout 2025. As a result, CRC published a news item on its website announcing the launch of RSPG public consultations on the following documents:

- Draft RSPG Opinion on the Long-Term Vision for the Upper 6 GHz Band (6425–7125 MHz);
- Draft RSPG Report on the Assessment of the Future Use of the 470–694 MHz Band in the European Union after 2030.

This provided stakeholders with the opportunity to participate in the consultations and express their views.

The most significant documents adopted by the RSPG include:

- Report on the Assessment of the Future Use of the 470–694 MHz Frequency Band in the European Union;
- Opinion on the Long-Term Vision for the Upper 6 GHz Band (6425–7125 MHz);
- Interim Opinion on the 2027 World Radiocommunication Conference (WRC-27);
- Opinion on the European Union Policy on Issues Related to Direct-to-Device (D2D) Satellite Connectivity and the Associated Single Market Issues;
- Report on the European Union's Strategic Vision for 6G Networks.

In 2025, CRC also participated in the meetings of the Radio Spectrum Committee (RSCOM), during which the following EC decisions were adopted:

- Commission Implementing Decision (EU) 2024/3157 of 17 December 2024 amending Implementing Decision (EU) 2021/1067 on the harmonised use of radio spectrum in the 5945–6425 MHz frequency band for the implementation of wireless access systems, including radio local area networks (WAS/RLANs).
- Commission Implementing Decision (EU) 2025/105 of 22 January 2025 amending Decision 2006/771/EC updating harmonised technical conditions in the area of radio spectrum use for short-range devices and repealing Implementing Decision 2014/641/EU on harmonised technical conditions of radio spectrum use by wireless audio equipment for programme making and special events (PMSE) in the Union.
- Commission Implementing Decision (EU) 2025/650 of 26 March 2025 amending Implementing Decision (EU) 2018/1538 as regards the update of the harmonised technical conditions for short-range devices within the 874–876 MHz and 915–921 MHz frequency bands.
- Commission Implementing Decision (EU) 2025/913 of 20 May 2025 amending Implementing Decision (EU) 2021/1067 as regards an update of the technical conditions for the harmonised use of radio spectrum in the 5945–6425 MHz frequency band for the implementation of wireless access systems, including radio local area networks (WAS/RLANs).

All four Decisions were transposed into the Bulgarian legislation through the amendments to the Rules for Free Use of Radio Frequency Spectrum adopted in 2025.

In 2025, RSCOM adopted and issued a mandate to the European Conference of Postal and Telecommunications Administrations (CEPT) to examine the feasibility of, and develop, the least restrictive harmonised technical conditions for the use of EU-harmonised frequency bands for terrestrial wireless systems providing electronic communications services through satellite systems enabling direct IMT device-to-device connectivity.

Participation in the activity of specialised international organisations

For another consecutive year, CRC participated in various forums organised by the International Telecommunication Union (ITU), the GSM Association (GSMA), the Network of Electronic Communications Regulators (FRATEL[48]) of the Member States of the International Organisation of La Francophonie, etc.

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[48] Réseau francophone de la régulation des télécommunications

CRC representatives participated in the Ministerial Programme of the annual Mobile World Congress (MWC[49]) and in the Round Table jointly organised by BEREC and the GSM Association (GSMA). During the Round Table, BEREC members and representatives of European mobile network operators discussed issues related to investments in the deployment of high-speed electronic communications networks (5G and beyond), as well as the protection of users of digital services.

The Ministerial Programme is the largest and most influential event in the field of connectivity, providing a unique platform for discussions where senior executives from leading global companies, regulatory authorities, government representatives and mobile network operators exchange views on topics related to the technologies of the future. During the Congress, representatives of major technology companies showcased the latest developments in the field of mobile communications.

Representatives of CRC, as members of the official delegation of the Republic of Bulgaria, participated in the World Telecommunication Development Conference (WTDC-25).

The World Telecommunication Development Conference is convened every four years to consider proposals, projects and programmes related to the development of new areas in telecommunications. The documents adopted by the Conference set out the strategies and objectives for the development of telecommunications/ICT and provide strategic guidance for the future activities of the ITU Telecommunication Development Sector (ITU-D).

The Conference was held under the theme "Universal, Meaningful and Affordable Connectivity for an Inclusive and Sustainable Digital Future", with one of its main objectives being to define the priorities of the ITU Telecommunication Development Sector (ITU-D) for the next four-year period (2026–2029). The Conference adopted the Baku Declaration and the comprehensive Baku Action Plan, which will guide the ITU's digital development initiatives, with particular emphasis on the world's most vulnerable regions, including the Least Developed Countries (LDC), Landlocked Developing Countries (LLDC) and Small Island Developing States (SIDS). The Baku Action Plan sets out the agenda for people-centred digital development driven by telecommunications and information and communication technologies (ICT), with a particular focus on the needs of developing countries, disadvantaged communities and vulnerable population groups.

During WTDC-25, the following were adopted:

- new and revised resolutions and recommendations covering a broad range of areas, including radio spectrum management, cybersecurity, digital inclusion, the deployment and regulation of ICT, innovation, and the use of digital technologies in remote areas;
- new regional initiatives for Africa, the Americas, the Arab States, Asia and the Pacific, the Commonwealth of Independent States (CIS), and Europe. The regional initiatives are intended to address specific priority areas in the field of telecommunications/ICT, such as ensuring access to infrastructure, enhancing digital skills, and delivering inclusive services through partnerships, and the mobilisation of resources for the implementation of projects under the Action Plan.
- new and revised questions to be studied by the ITU-D Study Groups.

[49] Mobile World Congress

In 2025, at international level, CRC also participated in the activities of the Francophone network for telecommunications regulation (FRATEL). The two events organised in 2025 - a seminar and the annual meeting - focused on matters relating to international connectivity and the role of major global digital market players.

The seminar was held under the theme “International Connectivity: Current Status and Future Prospects”. The event addressed the main regulatory challenges and issues affecting the international submarine connectivity market, the instruments for improving cross-border terrestrial connectivity, and the role of new low-Earth orbit (LEO) satellite constellations.

The annual meeting was held under the theme “Major Global Digital Market Players: What Is Their Impact at the Local Level?”. The meeting focused on the regulatory challenges facing digital services, particularly in the areas of cloud computing and artificial intelligence, as well as issues of global significance, such as the environmental footprint of the information and communication technologies (ICT) sector. Particular attention was given to cross-border cooperation and the role of regional associations of regulatory authorities in addressing these issues. A meeting was also held between the heads of the member countries and representatives of Amazon, Apple and Meta to discuss the role of major technology companies. The discussions covered issues including the lack of dedicated contact points for Africa on the part of the platforms, data storage, taxation, future strategic projects, and the commitments that the platforms could undertake. The participants also discussed the risks associated with the impact of online platforms and artificial intelligence on freedom of expression, access to knowledge, and innovation.

During the past year, the Electronic Communications Committee (ECC), operating within the framework of CEPT, held three meetings in which CRC experts participated. As a result, decisions were adopted to amend the conditions for the harmonised use of:

- the 5875–5935 MHz frequency band by safety-related Intelligent Transport Systems (ITS);
- the 1920–1980 MHz and 2110–2170 MHz bands for Mobile/Fixed Communications Networks (MFCN), including terrestrial IMT systems, with the aim of ensuring a greater degree of technology-neutral use;
- parts of the 116–260 GHz frequency band by specific radio determination applications without requiring an authorisation for the use of radio spectrum;
- the harmonised use of the 790–862 MHz frequency band for Mobile/Fixed Communications Networks (MFCN);
- the 703–733 MHz, 832–862 MHz, 880–915 MHz, 1710–1785 MHz, 1920–1980 MHz, 2500–2570 MHz and 2570–2620 MHz frequency bands for airborne user equipment (UE) for communications based on LTE and 5G New Radio (NR).

A decision establishing harmonised technical conditions for the use of the 862–870 MHz band by low-power devices for direct satellite connectivity was adopted, as well as a decision defining such technical conditions for the use of the 1258–1300 MHz frequency band by the Amateur Radio Service, ensuring protection of the networks of the Radionavigation-Satellite Service.

Work was also launched on the European Commission’s mandate concerning the upper part of the 6 GHz band, aimed at studying the possibility and developing harmonised technical conditions for efficient shared use of the 6425–7125 MHz frequency band (“upper 6 GHz”) for the latest and future technologies for terrestrial systems, for the provision of Wireless Broadband

(WBB) Electronic Communications Services (ECS), and for Wireless Access Systems, including Radio Local Area Networks (WAS/RLAN), taking into account their existing use. Recommendations for cross-border coordination were also updated.

CRC experts, as representatives of the authority responsible for implementing Regulatory Policy regarding the use of numbering resources for the provision of electronic communications in the Republic of Bulgaria, participated in the 30th and 31st working meetings of the Numbering and Networks (NaN) Working Group within the ECC. Documents related to the management of numbering resources and the provision of electronic communications services were reviewed. These included recommendations and reports covering topics such as alphanumeric sender identifiers for SMS messages, emergency calls and the use of virtual numbers. In parallel, coordination with international organisations was carried out and priorities were set for the future activities of the working group.

During the past year, the Frequency Management Working Group (WG FM) within the ECC held three meetings, attended by CRC experts. Within the framework of these meetings, decisions were adopted concerning the application of appropriate sharing and compatibility criteria between radiocommunication services and systems, consultations with various authorities and organisations in the CEPT countries, as well as the preparation of draft decisions, recommendations and reports in accordance with the assigned mandates. WG FM approved new regulations and conducted consultations in the areas of railway communications (FRMCS), Intelligent Transport Systems (ITS), satellite services (Galileo, D2C and low-power terminals), as well as the shared use of the 3.8–4.2 GHz frequency band. Recommendations related to Wireless Power Transmission (WPT), the measurement of electromagnetic emissions and Private Mobile Radio (PMR) systems were also published, together with statistics on radio interference in Europe for 2024. The published documents include updated recommendations on cross-border coordination and protection of radiocommunication services, draft amendments to decisions and reports on radiodetermination applications and ITS, as well as updated technical recommendations for short-range devices, wireless power transmission systems, non-ionising radiation measurements and coordination in various frequency bands.

In 2025, CRC fulfilled the following projects related to e-governance:

- The implementation of a public procurement with the following subject was completed: “Upgrading the information system that ensures the activities of registration of the transceiver stations of terrestrial networks capable of providing electronic communications services, the activities under Article 151(1)(16) SDA, as well as of small-area wireless access points”.
- The implementation of a public procurement with the following subject was completed: "Development of a system for formation of postal codes in the Republic of Bulgaria"
- Public procurement procedures were conducted, contractors were selected, and contracts were concluded for the provision of out-of-warranty maintenance of the information systems of CRC.

In 2025, CRC fulfilled the following projects related to improving the information and communication environment:

- Renewal of anti-spam and web filter licences, as well as providing an additional e-mail protection licence;
- Update of licensed Oracle software;
- Provision of licences for the protection of end-devices by using WithSecure;

- Provision of licences for the multi-factor authentication system for CRC employees;
- Improvement of the technical and communication procurement and related services:
  - Conducting a procurement with subject: "Supply of computer equipment";
  - Provision of out-of-warranty service of existing communication equipment and ensuring DNA licences.

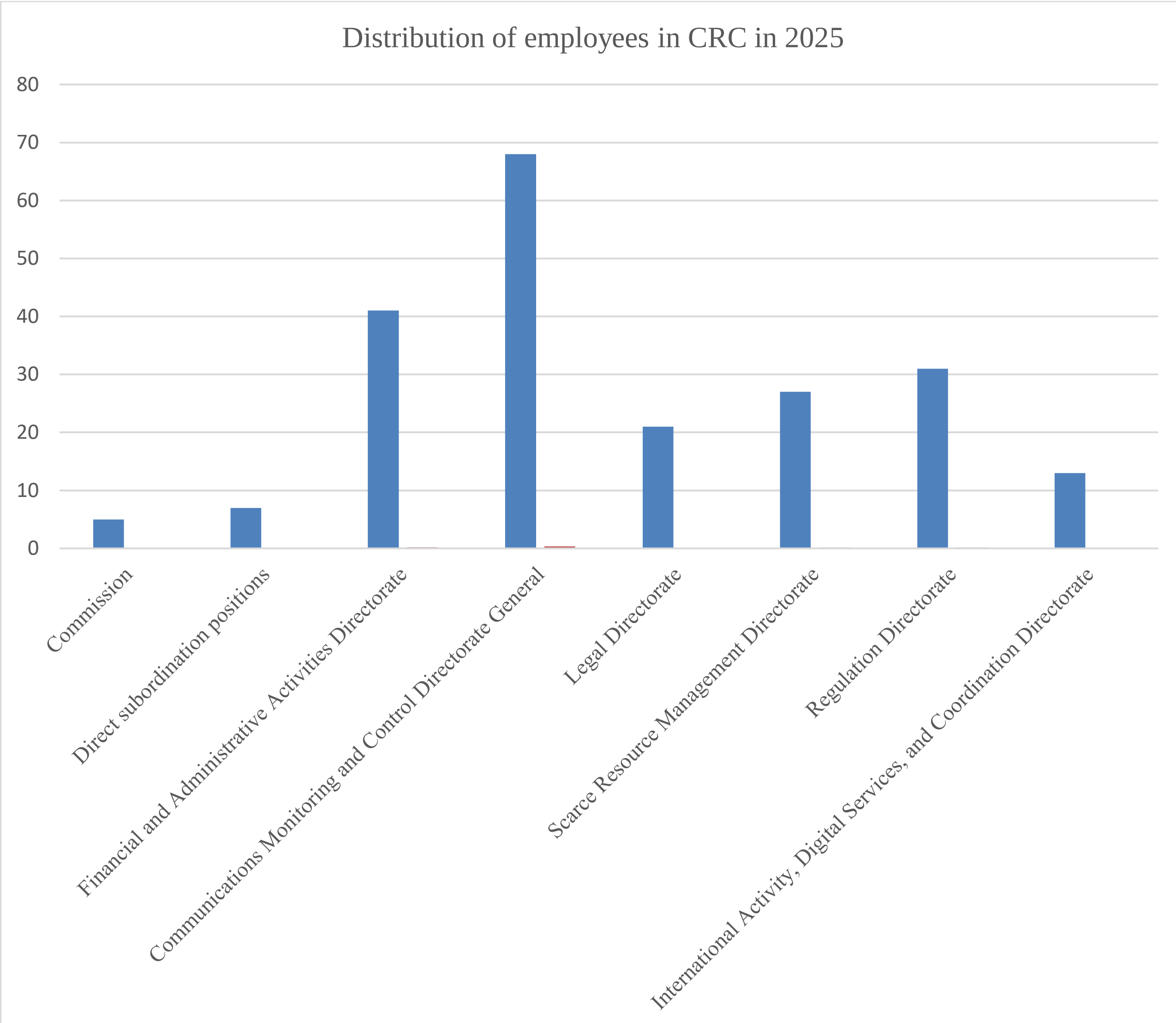
1.6. CRC's administrative capacity

The administrative capacity of CRC continued to develop sustainably in 2025, in line with the increasing requirements for regulatory activities and the dynamics of the sector. Human resources management remained a strategic priority aimed at ensuring a competent, motivated and adaptable administration capable of effectively performing its functions.

During the reporting period, CRC further developed its training and development system by introducing more precise mechanisms for identifying needs, planning training activities and assessing their effectiveness. The improvement of internal processes was supported by the active collection and analysis of knowledge, as well as by the implementation of good practices for the exchange of experience among employees.

In 2025, CRC performed its activity with the following distribution of employees:

• Committee	5
• Direct subordination positions and units	7
• Financial and Administrative Activities Directorate	41
• Communications Monitoring and Control Directorate General	68
• Legal Directorate	21
• Scarce Resource Management Directorate	27
• Regulation Directorate	31
• International Affairs, Digital Services, and Coordination Directorate	13

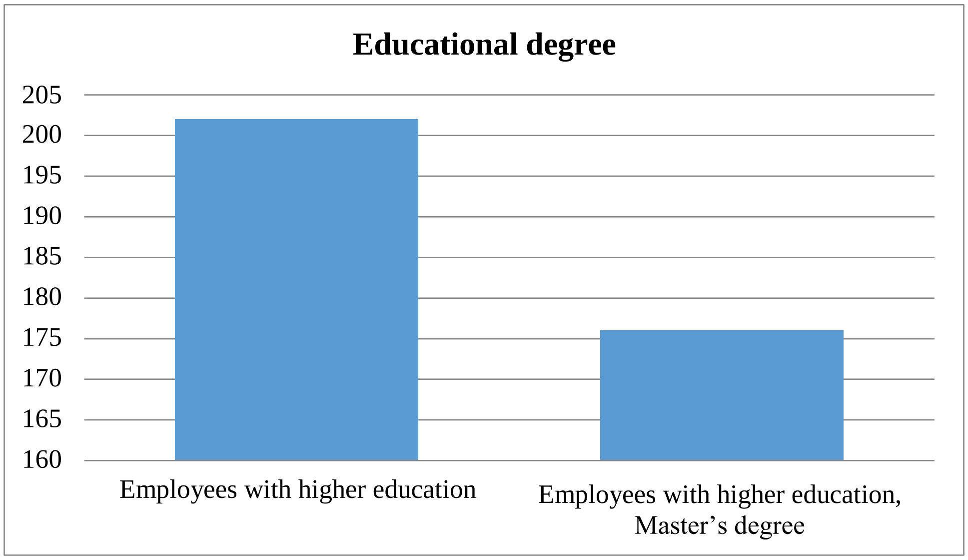


Source: CRC

Figure 46

The total number of CRC's staff was 255 full-time employees.

Of the total number of CRC employees, 202 had higher education, as 176 of them had an educational and qualification degree "Master".



Source: CRC

Figure 47

Staff education and development: The employees at the CRC administration had education in various areas, including technical, legal, economic and humanitarian sciences. The highest share was held by specialists with technical education, followed by those with economic education which is in line with the specifics of the Commission's activities. The employees at the CRC administration are appointed and dismissed in accordance with the provisions of the Law on Civil Servants (LCS), the Ordinance on the conduct of competitions and the selection for mobility of civil servants, and the established CRC’s internal rules.

Development of employees in 2025: In 2025, a total of 28 competition procedures were organised and conducted, resulting in 18 new employees being appointed by the end of the year. In addition, pursuant to Article 81a LCS, one employee from another administration joined the CRC administration. In the same period, 9 employees chose to continue their career development elsewhere.

Trainings, increasing the competence and professional skills: In 2025, in order to enhance the employees’ administrative capacity and update their knowledge, as well as to acquire new competencies necessary for the fulfilment of the new functions assigned to CRC, specialised trainings and seminars were organised as follows:

Table 19

Area of training	Number of trainings conducted	Number of trained employees
Administration management	24	72
Legal aspects of the administrative activity	13	148
Financial and economic management	11	15
Information systems and digital skills	15	129
Specialised trainings	12	139

Source: CRC

Figure 48

With the aim of increasing the effectiveness of the training process and ensuring the sustainable development of administrative capacity in 2025, CRC carried out an in-depth analysis of training needs. Based on this analysis, as well as on an additional study, programmes were planned and implemented, taking into account the specific nature of the Commission's activities and the available financial resources. The approach was aimed at providing training that supports employees in performing their current duties and acquiring new competences related to the expanding functions of the Commission.

As part of its established good practices, CRC applies a systematic approach to the collection and analysis of feedback. Employees' satisfaction with the training provided, its practical applicability and its impact on professional development are regularly assessed. In 2025, employees who participated in training activities completed three electronic surveys covering the assessment of the content and organisation of the training courses, as well as the identification of topics of interest for future programmes.

The results obtained were systematised and analysed, enabling more precise planning of training activities for the following year. This approach contributes to the establishment of a consistent and adaptive human resources development system that responds to the dynamics of the sector and the strategic objectives of the Commission.

Ensuring health and safety at work: In 2025, CRC continued to maintain high standards for safe and healthy working conditions, with a focus on prevention and the improvement of the working environment. Inspections of lighting conditions, electrical measurements and monitoring of technical parameters in the workplaces were carried out. The necessary safety instructions were provided, and work organisation was maintained in compliance with regulatory requirements.

2. Other important activities

2.1. Standardisation

As a national standardisation organisation for ETSI, pursuant to Article 30 of the LEC, and a national standardisation body under Article 27 of Regulation (EU) 1025/2012, CRC has fulfilled its obligations by providing access through its website to all stakeholders in the Republic of Bulgaria for providing opinions and comments on the draft European standards of ETSI and has ensured the implementation of the approved and published ETSI standards as national.

The Commission has participated in all public consultation procedures on ETSI's draft standards and working topics on standardisation (SReq). On its website, the Commission maintains up-to-date information on the procedures opened by ETSI for the approval of the draft European standards drawn up by ETSI, as well as useful information for stakeholders.

All standards published by ETSI have been introduced as Bulgarian standards (BDS) and have been part of the work programmes of the Technical Committees for Standardisation TC 47 "Radiocommunication Systems and Radio Equipment" and TC 57 "Information and Communication Technology" of the Bulgarian Institute for Standardisation (BIS). In compliance with the established deadlines, in 2025, 47 European (EN) ETSI standards were adopted by endorsement (with the titles translated into Bulgarian).

In 2025, CRC participated, through its representatives, in the work of four technical committees (TCs) for standardisation of BIS (TC 47, TC 57, TC 75, TC 80), which dealt with electronic communications. CRC experts participated in the translation into Bulgarian and the adoption as Bulgarian standards of European standards for postal services.

With the aim of familiarising sector undertakings with the activities of ETSI as one of the three recognised European Standardisation Organisations and with the functions of CRC as a national standardisation organisation, one Commission expert participated in a seminar organised by the Electronic Communications Association, presenting on the topic "ETSI and the Opportunities for Access to Standards and Participation in the Standards Development Process".

2.2. Performance of obligations related to Chapter 15 of the LEC

Five security incidents that had a significant impact on the operation of networks or services occurred in 2025. In April, two incidents with a significant impact on network operations were registered, resulting in outages to the mobile services of two undertakings and affecting a total of more than 500,000 users. The two incidents were not caused by cyberattacks but occurred during a software update. By Decision No. 172 of 08.05.2025, CRC required the two undertakings to provide comprehensive and reliable information regarding the incidents. In addition, CRC carried out inspections of both undertakings. Following the collection and consolidation of the information received, a meeting was held with the competent authorities under Article 243c LEC for preparing guidance on reducing the risk of incidents occurring during routine software updates. The remaining three incidents occurred due to the interruption of an optical cable or by problems affecting the operation of software platforms and impacted more than 40,000 users of mobile and fixed services.

The information collected was entered into the ENISA reporting portal.

2.3. Communications control

CRC carries out effective control on the compliance with the requirements of the Law on Electronic Communications and the regulations in the field of electronic communications.

In 2025, the communications control and monitoring regarding compliance with the LEC and the secondary legislation requirements in the area of electronic communications on the territory of the Republic of Bulgaria focused on protecting the interests of end-users in accordance with the principles of legality, non-discrimination and transparency.

For the fulfilment of its control functions, the Commission has built a territorial structure - a central unit in the city of Sofia and five administrative units in the cities of Vratsa, Veliko Tarnovo, Varna, Burgas and Plovdiv.

2.3.1. Monitoring and control of the radio spectrum for civil needs

The Commission carries out its main activities for monitoring and control of the radio spectrum for civil needs through the established and continuously developing NRSMS.

The preventive monitoring of the spectrum through the radio monitoring stations of NRSMS ensures appropriate conditions for the provision of electronic communications to the lawful spectrum users and guarantees a certain quality of services provided through them to end-users.

The need for sufficient free spectrum is increasingly deepened by the introduction of new broadband technologies and the continuous improvement of electronic communications, which is also essential for the development of competition in the sector.

The continuously increasing demand for radio spectrum, coupled with the need to ensure the uninterrupted operation of its legitimate users, requires continuous monitoring and control in order to promptly locate and eliminate sources of radio interference and identify illegal radio broadcasting equipment.

The development of modern technologies and the continuous advancement of electronic communications have led to a steady increase in the number of users of electronic communications services provided through the use of radio spectrum, as well as to the growing importance of monitoring and control for the effective management of the spectrum.

In 2025, the main activities in the area of radio spectrum monitoring and control were:

2.3.1.1. Protection of the interests of end-users

Setting up conditions for the normal work of lawful users of radio spectrum for civil needs, guaranteeing a certain quality of services provided to end-users, preventing the occurrence of illegal broadcasting is the main task of the conducted preventive and follow-up radio spectrum monitoring and control.

In 2025, as a result of regular scheduled monitoring, the undertakings were provided with the results of 6,624 measurements of the main technical parameters of radio transmitting stations on the territory of the country.

In 2025, as a result of the preventive regular control, the trend towards maintaining the parameters of broadcast radio signals within norms and reducing the generated out-of-band and intermodulation emissions, including in the range of the aeronautical service, was preserved.

2.3.1.2. Control regarding conformity with the rules for the use of radio frequency bands for civil needs

Throughout the year, daily scheduled monitoring in the 20 MHz ÷ 3 GHz/6 GHz frequency band was carried out through the fixed (manned and unmanned) radio monitoring stations from the NRSMS on the territory of their serviced zones, and through the mobile radio monitoring stations – periodic control and monitoring on the territory of the whole country.

In 2025, the monitored frequency range was extended up to 6 GHz in 4 (four) additional settlements through the deployment of new fixed *"compact system"* radio monitoring stations. As a result, the frequency range from 20 MHz to 6 GHz is now monitored in a total of 18 (eighteen) settlements (the cities of Sofia, Plovdiv, Burgas, Varna, Veliko Tarnovo, Pleven, Shumen, Stara Zagora, Targovishte, Lovech, Kazanlak, Yambol, Sliven, Gabrovo, Smolyan, Kardzhali, Ruse, and Vratsa).

2.3.1.3. Monitoring and control of the compliance of the established transmitting stations for analogue terrestrial broadcasting of radio signals and digital terrestrial broadcasting of television signals with the approved technical parameters

- ***In fulfilment of CRC decisions***, measurements of basic technical parameters of 48 (forty-eight) transmitting stations for analogue terrestrial radio broadcasting of radio signals and digital terrestrial television broadcasting for fulfilment of CRC decisions and for assessment of their compliance with the approved technical characteristics were carried out; During two of the inspections carried out, instances of non-compliance were identified, and instructions were issued requiring the transmitting stations to be brought into compliance. Follow-up inspections confirmed that the undertakings had taken the necessary measures to bring the transmitting stations into compliance.

2.3.1.4. Monitoring for evaluation of the electromagnetic environment

- ***VHF frequency ranges for radio and television broadcasting for evaluation of the electromagnetic environment and cross-border interferences***

In 2025, special attention continued to be paid to the monitoring in the VHF frequency bands for radio and television broadcasting in the border areas of the country for evaluation of the electromagnetic situation and cross-border penetration from neighbouring countries of the Republic of Bulgaria. On the territory of 27 (twenty-seven) settlements, specialised measurements were carried out to evaluate the electromagnetic situation and register cross-border penetration from the territories of the neighbouring countries. The results were summarised and documented in the prepared 238 measurement reports. All data obtained from the measurements were analysed for compliance with the protection ratio between the EMF intensity of broadcasting transmitting stations (under Rec. ITU-R BS. 412 and ITU-R BT.1368 of ITU). The electromagnetic environment and cross-border penetration on the Bulgarian Black Sea coast was carefully monitored during the summer months when the penetration due to the influence of the environment (air temperature, sea water temperature and the state of the sea surface) is intensified.

To evaluate the electromagnetic situation in support of spectrum management, in 2025, measurements were also carried out in 23 (twenty-three) settlements in the interior of the country and were documented in 362 measurement reports.

- ***Monitoring of frequency ranges intended for mobile PMR networks -*** evaluation of the actual radio spectrum occupancy and registration of illegal broadcasting.

- On the territory of 23 (twenty-three) settlements, through the radio monitoring stations (fixed and mobile), monitoring of frequency ranges intended for mobile PMR networks was conducted to assess the actual spectrum occupancy, and the results were summarised in 352 measurement reports.

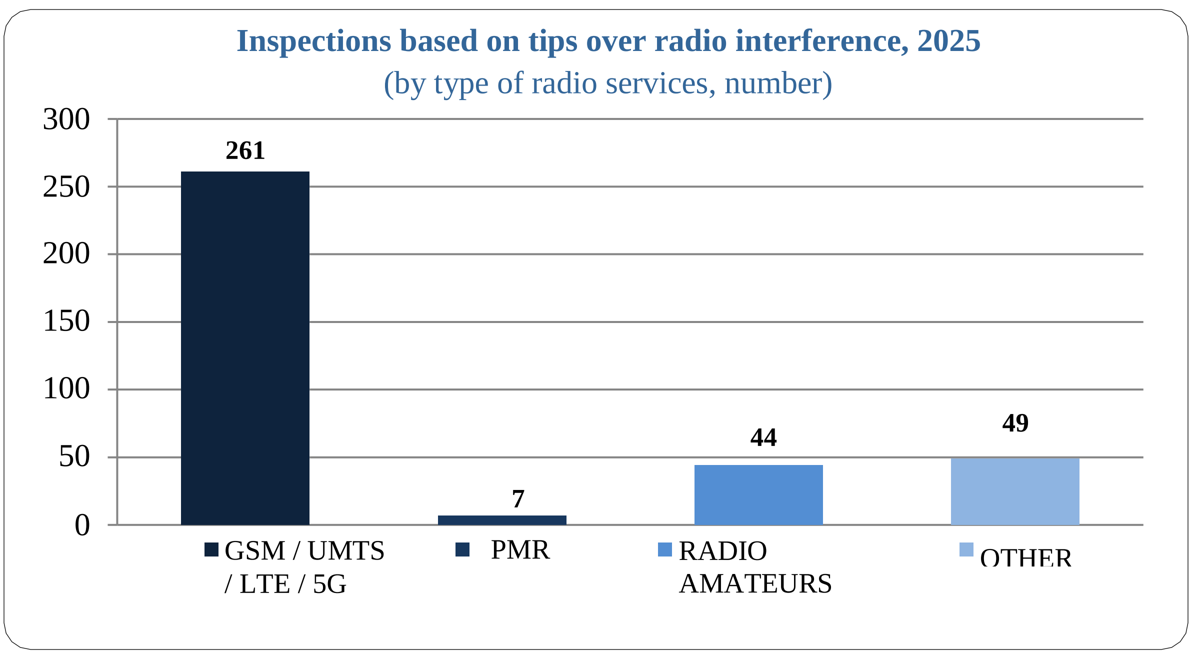
▪ ***Evaluation of the electromagnetic compatibility of VHF/FM radio broadcasting stations in the 87.5-108.0 MHz band and the radio navigation and communication equipment of the aeronautical services operating in the 108.0-137.0 MHz frequency band.***

In accordance with the *Methodology for Measuring Type A1 Intermodulation Products Generated by Closely Located VHF Radio Transmitting Stations*, and with the aim of ensuring electromagnetic compatibility and the reliable operation of the radionavigation and communications equipment of aeronautical services, 4 (four) measurements were carried out at 2 (two) radio transmitting sites.

2.3.1.5. Monitoring and control over the quality of provided services with a view to the protection of public and end-user interest

▪ ***Monitoring with regard to tips over radio interference received*** from lawful spectrum users, citizens, organisations, and agencies.

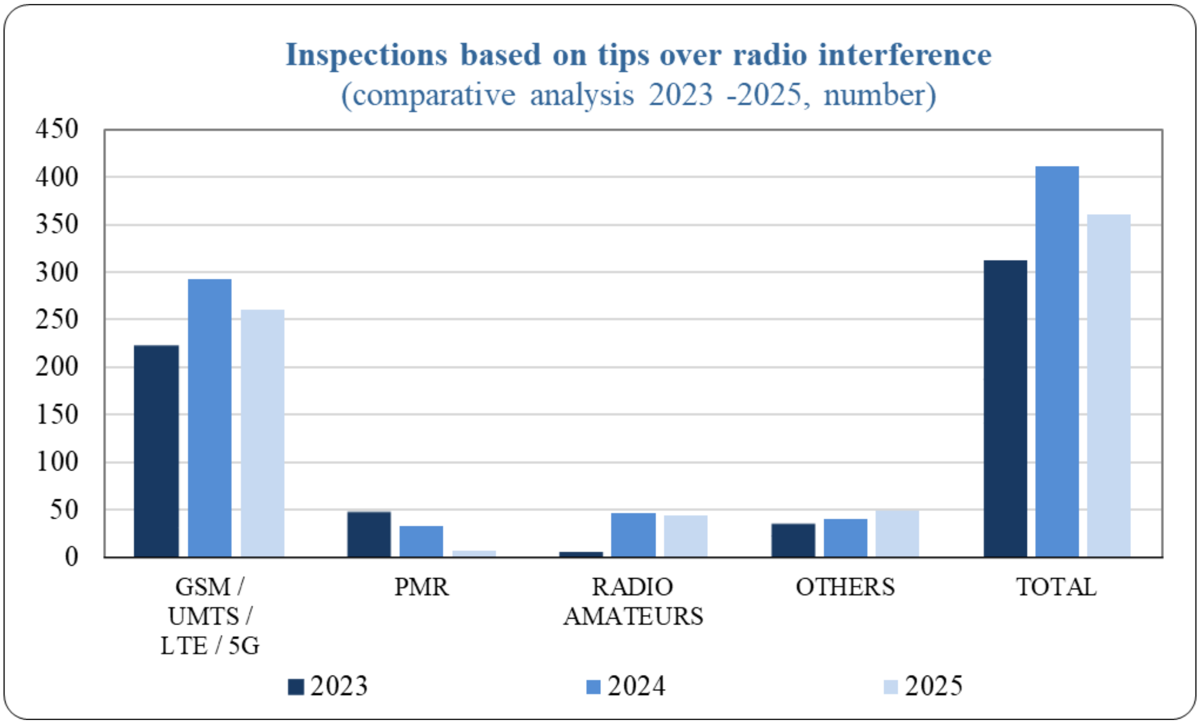
In 2025, the necessary measures for quick localisation and elimination of interfering sources were timely undertaken. A total of 226 (two hundred twenty-six) cases of radio interference were investigated and the results were included in 361 measurement reports (Fig. 49). The interferences from GSM/UMTS/LTE/5G repeaters transmitting in frequency ranges intended for public electronic communications through mobile terrestrial networks had a relatively high share in 2025 as well. The next most common category comprised cases of harmful interference caused by faulty radio equipment (both consumer and network equipment) and by short-range RFID devices operating in accordance with the U.S. standard. Interference transmissions resulting from the use of jammers were also registered.



Source: CRC

Figure 49

A comparative analysis of the studied cases of interference in connection with inspections related to the received tips, by type of services for the period 2023-2025, is presented in Figure 50.



Source: CRC

Figure 50

▪ ***Monitoring and inspections with relation to tips received regarding coverage provided by mobile terrestrial networks, terrestrial digital television networks under the DVB-T standard;***

In 2025, 124 (one hundred twenty-four) tips concerning problems with the coverage by mobile terrestrial networks, DVB-T terrestrial digital television networks were investigated, and 337 measurement reports were drawn up for the results:

– coverage of ***mobile terrestrial networks*** - in connection with 112 (one hundred and twelve) tips received for lack of coverage of mobile terrestrial networks (GSM/UMTS/LTE/5G), in 2025, an analysis of the declared coverage was made and the necessary measurements were carried out, documented in 317 measurement reports; scheduled measurements of the ensured coverage and quality of the services provided over the GSM/UMTS/LTE/5G mobile terrestrial networks in 47 settlements and 23 routes from the Republican road network were carried out, and the results were included in 285 measurement reports;

– coverage of ***terrestrial digital television under the DVB-T standard*** - in connection with received 12 (twelve) tips, inspections and measurements were carried out on the territory of the country, included in 20 measurement reports; scheduled inspections of the coverage and quality of the services provided over DVB-T networks were also carried out and the results were included in 177 measurement reports;

– The results of the monitoring and control of the radio spectrum carried out in 2025 are summarised in a total of 5,110 measurement reports, as 3,369 measurement reports were drawn up for the conducted scheduled monitoring, with data from the conducted monitoring by the fixed and mobile radio monitoring stations of the NRSMS on the territory of the whole country. As a result of the continuous monitoring carried out across a large part of the country's territory, no cases of unauthorised use of the radio spectrum were detected.

2.3.2. Inspection activity

In 2025, in connection with the Commission's control functions related to electronic communications provision pursuant to the LEC, 3,548 inspections were carried out (38% more versus 2024).

In 2025, the main focus was again on compliance with the requirements of the LEC in terms of ***protection of the interests of end-users***, with 1,393 inspections carried out in connection with tips received from users concerning the electronic communications services provided. The main categories of inspection activities carried out in response to complaints submitted by users of electronic communications services were as follows:

- ***compliance with the requirements of Chapter 14 of the LEC*** concerning the contracts signed with undertakings providing electronic communications services:

- ***problems with contracts concluded with undertakings -*** in 2025, a significant increase was observed in the number of tips received in relation to contracts concluded with undertakings. A total of 399 inspections were carried out (266 more than in 2024, representing an increase of more than twofold). The inspections concerned price packages or tariffs (and the conditions governing their use), the mandatory content of proposed individual contracts, the general terms and conditions of individual contracts, complaints regarding discrepancies between the terms offered verbally and those reflected in the contract, complaints concerning the practice of signing contracts electronically on tablet devices, as well as the indexation of monthly subscription fees and unilateral amendments to contracts.

– ***dispute of bills and charged penalties*** - in 2025, there was an increase in the number of tips received in connection with disputed bills and charged penalties in using mobile services - a total of 93 inspections were carried out (approximately 130% more than in 2024).

For ascertained violations of Chapter 14 of the LEC, in 2025, 20 (twenty) administrative offence acts (AOAs) were drawn up.

- ***compliance with the requirements of Chapter 15 of the LEC*** on confidentiality of communications and user data protection – 289 inspections were carried out (approximately 366% more inspections compared with 2024):

– ***sending of unsolicited messages for the purposes of direct marketing and advertising without the prior consent of the users*** as well as problems in the use of value-added services - amounts charged when registering in games, quiz games, purchase of information and entertainment contents and other Information Society Services; In 2025, a dramatic increase was observed in the number of tips concerning direct marketing messages and calls. A total of 269 inspections were carried out, representing an increase of approximately 389% compared with 2024.

In connection with the inspections carried out in 2025 for compliance with Chapter 15 of the LEC, 19 (nineteen) AOAs were drawn up for the violations found.

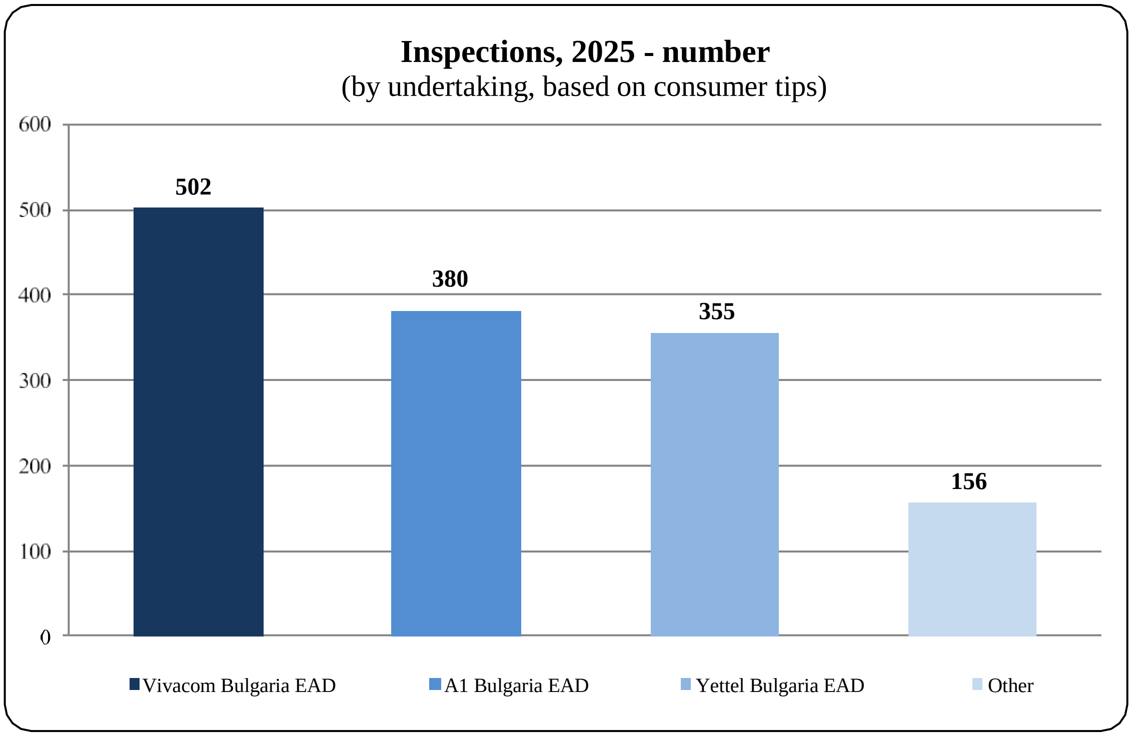
- ***problems with the use of mobile roaming services*** – in 2025, an increase in the received tips regarding problems with the use of mobile roaming services was observed – 208 inspections were carried out (approximately 30% more than in 2024) in connection with tips received over problems with mobile roaming services; 3 (three) AOAs were drawn up for the violations found during these inspections.

The trend observed in previous years continued in 2025, with the vast majority of inspections carried out in response to consumer tips relating to issues concerning contracts concluded with undertakings, the receipt of unsolicited direct marketing messages, and problems encountered when using mobile services while roaming.

- ***quality of the services provided*** - problems with the quality of services provided, non-provision of services, provision of and quality of the universal voice service, speed of fixed Internet, failures, etc. – 134 inspections were carried out (approximately 29% more compared with 2024). Two AOAs were drawn up for non-provision of "*universal voice service*".

- problems in carrying out ***number portability*** in case of change of the telephone service provider - in 2025, 95 inspections were carried out (approximately 86% more compared with 2024). For violations of the *Functional specifications for portability of nationally significant numbers*, 6 (six) AOAs were drawn up.

In 2025, the major share (approximately 87%) of the inspections on consumer tips received by the Commission were carried out on the three largest undertakings providing electronic communications services (Fig. 3). A total of 1,237 inspections were carried out (658 more than in 2024) in relation to consumer tips from end-users concerning the services offered by the three undertakings, as follows: Vivacom Bulgaria EAD - 502 inspections, A1 Bulgaria EAD – 380 inspections, and Yettel Bulgaria EAD – 355 inspections.



Source: *CRC*

Figure 51

In 2025, 826 inspections were defined on the basis of *risk analysis* (approximately 23%), including scheduled inspections regarding the provision of electronic communications by undertakings that have submitted notifications to CRC to terminate their activity, inspections regarding the performance of activity after terminated authorisations or expired authorisations, inspections of coverage and quality of DVB-T networks and mobile terrestrial networks, inspections of mobile undertaking's base stations for compliance with the Register of transceiver stations and wireless access points of CRC, etc. During the scheduled inspections, no violations of the LEC were found, defined on the basis of a risk analysis.

A total of 142 inspections were carried out for compliance with the conditions of the authorisations and for fulfilment of the CRC decisions, compliance with specific obligations and inspections of electronic communications networks for terrestrial analogue broadcasting for compliance of the transmitting stations with the technical characteristics approved by CRC, and for compliance with prescriptions given. No violations of the LEC were found during the inspections.

Pursuant to Article 216(4) of the LEC, undertakings providing public electronic communications networks and/or services are required to submit their retail prices to the Commission for information at least three days before they enter into force. Furthermore, pursuant to Article 7 of the General Requirements for the Provision of Public Electronic Communications *(prom. SG, no. 108 of 17 December 2021, amended SG. no. 42 of 7 June 2022, amended SG, no. 56 of 30 June 2023),* undertakings providing public electronic communications networks and/or services make their retail prices and tariff conditions available in accordance with Article 216(4) of the LEC by publishing them in the electronic comparison tool accessible via the Commission's website. To verify compliance with this obligation, inspections were carried out of 89 undertakings that had failed to submit information to the Electronic Communications Services Tariff Comparison Tool (the Tool) available on the CRC's website. As a result of the inspections, 73 undertakings submitted the required information to the Tool. A total of 27 (twenty-seven) AOAs were drawn up to undertakings whose prices had entered into force within the previous year and which had failed to submit the required information to CRC.

For compliance with the General requirements for carrying out public electronic communications, a total of 173 inspections were carried out, 165 of them being inspections of undertakings that have not provided information or have provided incomplete or inaccurate information to CRC about their activities in 2025, or about their activities related to broadband Internet access provision.

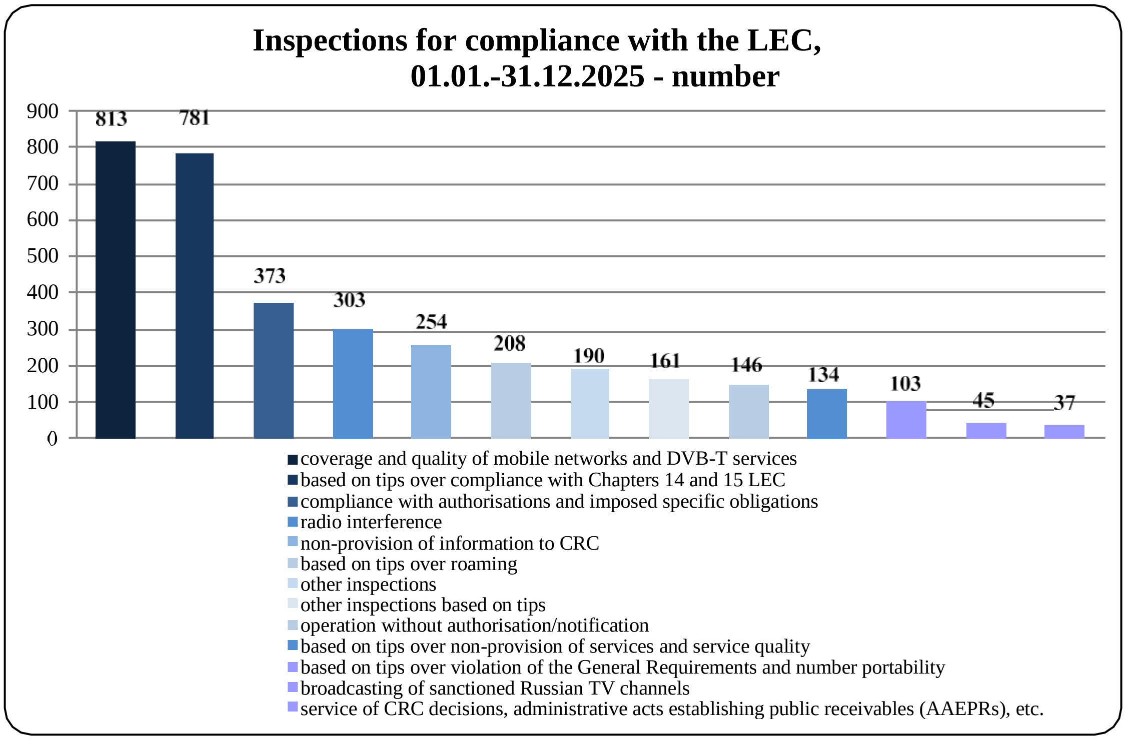
In connection with ascertained violations regarding compliance with the *General requirements for carrying out public electronic communications*, 9 (nine) AOAs were drawn up.

In 2025, 36 scheduled inspections were carried out of undertakings providing radio and television programme distribution services to verify compliance with Council Regulation (EU) No 833/2014 of 31 July 2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine, in particular the prohibition on the distribution of Russian television channels. No violations were identified, and no prohibited television channels were found to have been distributed.

Following the incident that occurred on 25.04.2025 and had a significant impact on the network of Vivacom, the necessary inspections and measurements were carried out. Users of mobile voice services and mobile Internet access services throughout the country were affected. Between 07:00 and 10:12 on 25.04.2025, 12.67% of users (354,760 users) experienced difficulties in making calls, while approximately 1% of users (28,000 users) experienced difficulties in accessing the Internet.

Following the incident that occurred on 29.04.2025 and had a significant impact on the network of A1 Bulgaria, the necessary inspections and measurements were carried out. The incident resulted in difficulties and, in some cases, the inability to make or receive voice calls and send or receive SMS messages for some of A1's subscribers. Only services provided over the 2G and 3G networks were affected.

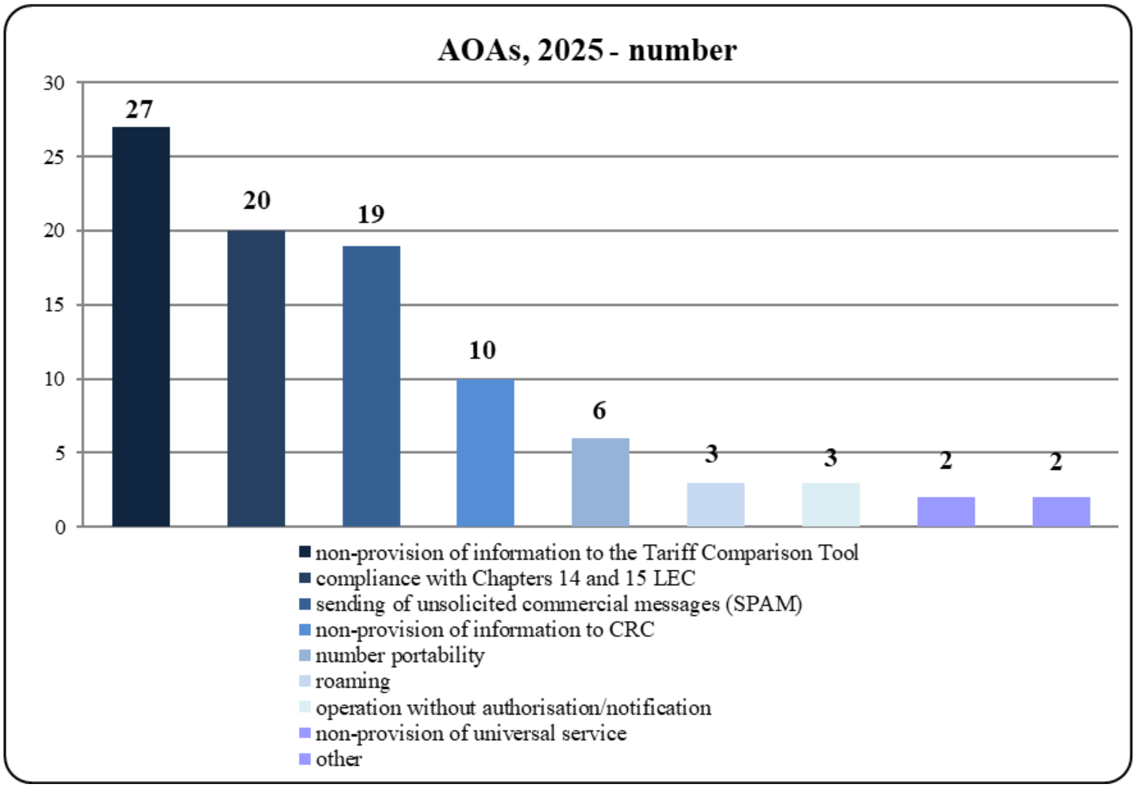
Summarised data on the performed control activity and the engaged administrative and punitive liability in offences of the LEC and secondary regulations in 2025 are displayed in Figure 52 and Figure 53.



Source: *CRC*

Figure 52

As a result of the inspections carried out, a total of ***92 (ninety-two) AOAs were drawn up*** in 2025 ***for administrative violations*** of the LEC. Of these, 50 (fifty) AOAs were drawn up in relation to violations found during inspections conducted in response to consumer tips.



Source: *CRC*

Figure 53

2.4. Quality of the Internet access and net neutrality service

With regard to the quality of retail internet access services provided to end-users, providers are required to comply with Regulation (EU) 2015/2120 on open internet access[50] (the Regulation). Pursuant to Articles 3 and 4 of the Regulation, these providers are required to provide end-users with information on the measures they apply to ensure open internet access and net neutrality, as well as on the quality of the services they provide in terms of download and upload speeds.

CRC monitors compliance with the Regulation by analysing the information collected through the CRC's annual questionnaires. In addition, the information published on the undertakings' websites is reviewed, and inspections are carried out in relation to consumer complaints. Providers comply with the requirements of Articles 3 and 4 of the Regulation, as follows:

- they do not implement network traffic management measures that include blocking or delaying certain categories of users, application/content, ports or protocol, save for the cases defined as exceptions in accordance with Article 3 of the Regulation;

[50] Regulation (EU) 2015/2120 of the European Parliament and of the Council of 25 November 2015 laying down measures on open Internet access and amending Directive 2002/22/EC on universal service and users' rights relating to electronic communications networks and services and Regulation (EU) 531/2012 on roaming on public mobile communications networks within the Union

- they do not dedicate capacity and/or manage traffic to ensure the quality of their own content/services or of a contracted content provider;
- quality parameters, traffic management measures and information under Article 4 of Regulation (EU) 2015/2120 for the majority of undertakings are contained in their General Terms and Conditions, in contracts with end-users or are contained in a separate document on their website;

In 2025, CRC monitored and maintained the functioning of the Mechanism for measuring and monitoring of the quality parameters of the Internet access service (IAS) (the Mechanism), which has been available to end-users since 2023. It provides the ability to measure the parameters of fixed Internet access - through the public portal nettest.crc.bg, and of mobile Internet access - through the CRC Network Quality application, available in Google Play and the App store. For fixed Internet access, the mechanism enables measurements to be carried out both for users' information purposes and for the purposes of legal protection. Where appropriate, the Commission provides complainants with information about the Mechanism and the relevant links to the CRC website, where they can review the conditions for conducting measurements for the purposes of legal protection and, if necessary, perform such a measurement. Despite this possibility, in 2025 no consumer complaints were submitted based on measurements carried out using the Mechanism.

Compared with the previous year, the number of measurements performed in 2025 was significantly higher – 1,924 for fixed networks and 939 for mobile networks. Measurements were carried out both in large cities and in smaller settlements. The measured download speed values covered a wide range – from several Mbit/s to around and above 1 Gbit/s.

No complaints relating to Article 3 of the Regulation were submitted to CRC.

Complaints concerning the quality of Internet access over mobile networks related both to services provided at a fixed location and to mobile Internet access. In cases concerning Internet access services provided at a fixed location via a mobile network, where it is established that there is insufficient network coverage at the specific location and that the service cannot be provided with an adequate level of quality, the service provider most commonly removes the minimum contract term, allowing the subscriber to terminate the contract without penalties at their discretion, or directly terminates the contract without penalties and discontinues the service.

With regard to mobile Internet access, since the service is not tied to a specific location, the absence of speeds corresponding to the contractual conditions is not considered sufficient grounds for termination of the contract. The General Terms and Conditions governing the relationship with end-users describe the factors that may affect the Internet access speeds actually experienced by users. Nevertheless, operators take the reported issues into account when planning future investments aimed at improving network coverage and, consequently, the quality of the service.

Complaints concerning Internet access over fixed networks (optical, copper or LAN networks) mainly relate to service interruptions caused either by network faults or by service providers migrating customers to a different access technology. Such complaints are most commonly directed against service providers that have acquired the customer base of a smaller operator.

Where faults resulting in service interruptions are not remedied within a reasonable period, service providers generally grant compensation for the period during which the service was unavailable. During the reporting period, the number of complaints concerning the provision of speeds below those agreed in the contract was relatively low. In most cases, the issue was resolved either by replacing the router or by terminating the service.

2.5. Protection of the interests of the electronic communication services users

In 2025, CRC received 2,511 complaints from end-users of electronic communication services within the meaning of Chapter 14 of the LEC. To compare with, in 2024, the number of complaints was 1,705.

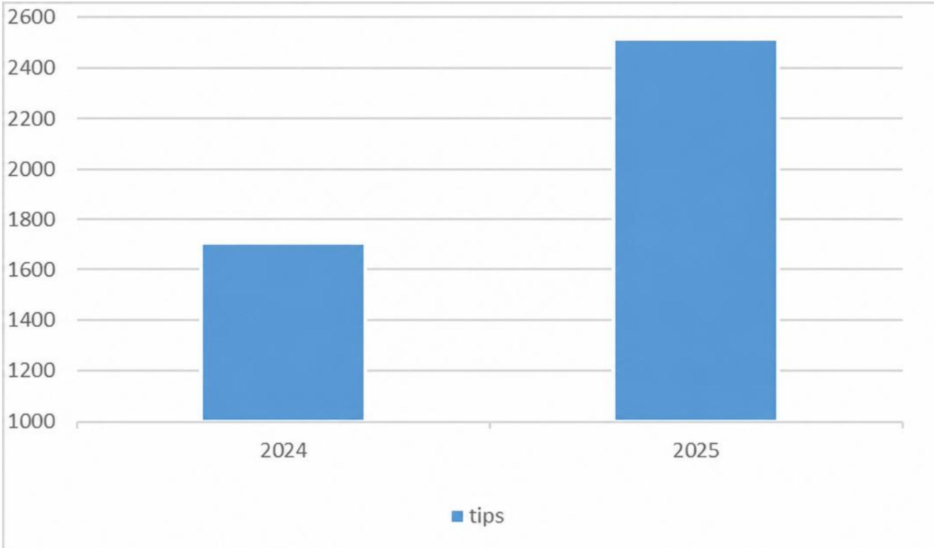
The majority of complaints (continuing the trend observed in previous years) relate to disputed bills, the charging of digital content and value-added services (information, entertainment and other paid content access services), unilateral amendments to contracts, termination of electronic communications service contracts, misleading information provided at service providers' retail outlets, as well as charges for roaming services, including those resulting from inadvertent cross-border roaming within the territory of the Republic of Bulgaria.

Other reasons for consumer tips submitted to CRC include issues related to the quality of Internet access and television services, roaming, voice services, and calls to "0700" numbers. With regard to the quality of Internet access and television services, complaints most commonly concerned low transmission speeds due to poor or insufficient network coverage, as well as the unavailability of services resulting from network outages affecting multiple users or other technical issues. Consumers typically request the termination of their electronic communications service contracts without penalties, financial compensation for prolonged service outages, or the cancellation of charges imposed upon the early termination of electronic communications service contracts.

Despite receiving its statutory powers at a relatively late stage, the Commission worked throughout the year on the implementation of the DSA and received 68 (sixty-eight) complaints. Of these, 54 (fifty-four) were identified as alleged infringements of the DSA, while 11 (eleven) were submitted directly to the Irish Digital Services Coordinator (DSC). Of the total number of complaints received, 14 (fourteen) were determined to fall outside the scope of the DSA.

An analysis of the consumer complaints relating to the quality of Internet access services is provided in Section ***2.4***. ***Quality of the Internet access and net neutrality service.***

Tips received by CRC, 2024 and 2025



Source: CRC

Figure 54

In 2025, CRC received 23 tips and complaints related to the reception of digital terrestrial television (DVB-T). To compare with, in 2024, those tips were 31. The main complaints concerned interruptions or instability of the signal, lack of signal/service, and deteriorated reception quality. Opinions were requested from the relevant undertaking in relation to the submitted tips and complaints, inspections and measurements were carried out where necessary, and other state authorities were notified in relation to some of the complaints. Users were provided with guidance regarding the conditions for the reception and the retuning of receivers.

In 2025, CRC received a total of 122 tips and complaints related to the coverage of mobile electronic communications networks, as well as to transceiver stations registered in the Register of transceiver stations of terrestrial networks and small-area wireless access points. The complaints concerned lack of mobile coverage, poor or unstable signal, and deteriorated quality of mobile services, contract termination, electromagnetic field levels, and the construction of base stations. Inspections were carried out in relation to all submitted tips, and technical measurements were performed where necessary. Opinions were requested from the relevant undertakings regarding the specific cases. After the information was processed, written responses were provided to users, and other state authorities were notified where necessary. Some of the tips received during the year concerned matters falling outside the supervisory and regulatory powers of CRC. In such cases, the regulator acts as a mediator and refers the dispute to the relevant provider with the aim of reaching an out-of-court settlement within a short timeframe. In the framework of this procedure, most of the disputes brought before CRC were resolved in whole or in part in favour of the consumer concerned: the disputed amounts were returned, the concluded contract was terminated without penalties or transformed into open-ended ones, the unsolicited services were deactivated, the affected users were granted discounts and other preferences such as compensation, etc.

A number of tips were forwarded to other state control bodies, according to their competence and in compliance with Article 112 Administrative Procedure Code.

In the past year, CRC representatives held a total of five working meetings with representatives of mobile undertakings with the purpose of improving user protection. During the meetings, issues related to the arrangements established for the fulfilment of the undertakings' legal obligations were discussed.

The meetings contributed to increasing the effectiveness of regulatory oversight and improving the practices of undertakings in the area of consumer protection by enhancing transparency, ensuring consumer rights, and ensuring that providers' activities comply with the national and European regulatory framework.

Cooperation with the Commission for Consumer Protection

There is a shared competence between CRC and the Commission for Consumer Protection (CCP) regarding a number of issues related to consumer protection in the area of electronic communications services.

Tips related to distance contracts, unfair trade practices, removing unfair contract clauses, charging of unsolicited services, information services, digital content, etc., have been referred to the Commission for Consumer Protection with a view to its competence pursuant to the Law on Consumer Protection.

In 2025, CRC and CCP continued their joint work in the framework of the work of the Sectoral Conciliation Committee for the consideration of disputes in the field of electronic communications, established with the provision of Article 182(4) Law on Consumer Protection.

Legal representation in cases of CRC

In 2025, procedural representatives of CRC participated in 103 meetings on administrative/administrative-criminal cases before the regional and administrative courts of the country.

During the year, 25 court judgments were issued upholding appeals against penalty decrees issued by CRC in 2025. No court judgments annulling penalty decrees issued by CRC in 2025 were rendered.

On the individual administrative acts issued by CRC, 13 complaints were filed before the administrative courts. During the year, 12 CRC decisions were upheld in full. This number reflects the fact that two appeals were lodged against one of the contested CRC decisions, while one of the appeals concerned a letter which the court held not to constitute an individual administrative act. Four CRC decisions were annulled, and two decision were remitted by the Supreme Administrative Court for reconsideration. During the year, one appeal was lodged against an Act Establishing a Public State Receivable (AUPSR), which was annulled by the court of first instance.

2.6. Activities under the Law on Electronic Communications Networks and Physical Infrastructure (LECNPI)

In 2025, three dispute resolution procedures under the Law on Electronic Communications Networks and Physical Infrastructure (LECNPI) were concluded. The CRC decisions concerned disputes under the LECNPI relating to requests for binding instructions to be issued to United Fiber Bulgaria EOOD regarding the pricing conditions for the use of the company's underground duct infrastructure. On 13.08.2024, a corporate restructuring by way of demerger was registered with the Registry Agency, whereby part of the rights and obligations of Vivacom Bulgaria EAD was transferred to United Fiber Bulgaria EOOD, including the underground duct infrastructure.

In its decisions issued on disputes in 2025, CRC issued binding instructions to United Fiber Bulgaria EOOD to apply the pricing conditions in force as of 31.12.2022, as finally confirmed by Decision No. 5932 of 04.06.2025 in Administrative Case No. 3782/2025 of the Supreme Administrative Court, until prices for the services are determined in accordance with the approved Reference Offer for Access to Passive Infrastructure.

IV. BUDGET

CRC budget implementation for 2025

The Commission Chairman is a primary budget administrator pursuant to Article 50 LEC. Pursuant to Article 38(1) Law on State Budget of the Republic of Bulgaria (LSBRB) for 2025, CRC was allocated with:

- revenue, in the amount of BGN 107,789.2 thousand;
- expenses, in the amount of BGN 25,161.6 thousand.;
- transfers, in the amount of BGN 82,627.6 thousand.

The Commission administered revenue pursuant to Article 51(1) LEC.

In 2025, the revenue earned from fees, fines, financial sanctions and interest amounted to BGN 113,029.9 thousand - 105% of the annual plan.

Revenue amounting to BGN 1,945.6 thousand was generated from one-off fees for the additional allocation of radio spectrum in the 900 MHz band to each of the three mobile operators, as well as from one-off fees amounting to BGN 54,000 thousand for the extension of the validity of three licences in the 2 GHz band.

In 2025, two budget expenditure adjustments were approved, increasing the CRC's annual budget to BGN 25,580.6 thousand. Expenditure amounting to BGN 25,115.7 thousand was reported, representing 98% implementation of the revised annual budget.

In 2025, transfers amounting to BGN 41,313.8 thousand were made to each of the Ministry of Transport and Communications and the Ministry of Electronic Governance. The total amount of transfers provided was BGN 82,627.6 thousand, representing 100% of the level prescribed in Article 38(1), Article 25(1) and Article 26(1) of the 2025 Law on State Budget of the Republic of Bulgaria, in accordance with Article 19(1) LEC.

Review of fees collected and administrative costs incurred in 2025

The structure of revenue from fees under the CRC budget for 2025 was as follows:

Table 20

Revenue from fees	Amount (BGN'000)
Revenue generated for 2025, incl.:	112,979.6
- one-off fees under the LEC	57,007.6
- one-off fees under the PSA	4.6
- one-off fees under the SDA	46.0
- one-off fees under the LECNPI	2.7
- administrative fees under the LEC, including:	5,596.3
administrative annual control fee under the LEC	5,566.7
one-off fees for administrative services under the LEC	29.6
- administrative annual control fee under the PSA	776.5
- annual fees for use and temporary use of radio spectrum	44,103.7
- annual fees for the use of the positions on geostationary orbit with the appropriate radio spectrum	123.1
- fees for the use of numbering resources	5,319.1

Additionally earned revenues from fees, sanctions and interest in the amount of BGN 50.3 thousand.

In connection with the enforcement of acts for the establishment of public state receivables to be collected and enforced punitive decrees, revenue in the amount of BGN 12 thousand were collected in 2025 by NRA.

The funds allocated for 2025 under the expenditure part of the Commission's budget under the Law on State Budget of the Republic of Bulgaria and under the Council of Ministers' decrees granting additional funds to the Commission in 2025 were used to finance the activities of CRC and its administration, including projects and studies, analyses and expert assessments related to market regulation and liberalisation, participation in the work of BEREC, and the provision of effective and efficient regulatory oversight.

The Commission's expenditure structure for 2025 was as follows:

Table 21

Type of expenses	Amount (BGN'000)	Share (%)
1. Salaries	9,947.4	39.7
2. Social security contributions	2,721.0	10.8
3. Other remunerations and payments	340.2	1.4
4. Operating costs	3,065.8	12.2
5. Taxes and fees paid	46.3	0.1
6. Membership fee	122.7	0.5
7. Capital expenditure	8,872.3	35.3
Total expenditure:	25,115.7	100

According to Section B "Expenditure", Group I "Current Non-Interest Expenditure", item 3 of the CRC's Profit and Loss Statement for 2025, the amount of the allowances for depreciation for 2025 was BGN 4,573 thousand. The amount of expenditure in Section B "Expenditure and Acquisition of Non-Financial Assets", Group I "Payments for Current Non-Interest Expenditure" of the Cash Fulfilment Statement for 2025 of CRC, was BGN 16,243 thousand.

The amount of the administrative expenses of CRC for 2025, within the meaning of Article 139(1) LEC, is greater than the collected administrative fees. This difference, on the basis of Article 53(1) LEC, leads to the need to increase the amount of the administrative annual control fee.

The budgetary funds spending was carried out in strict compliance with the financial discipline and the principles of legality, appropriateness, effectiveness and efficiency. Projects assigned to CRC by regulatory acts were implemented of priority.

The investment policy of CRC in 2025 included:

- supply of dedicated measurement equipment for the National Radio Spectrum Monitoring System for Civil Needs;
- Completion of the construction of the building of a laboratory for electromagnetic compatibility for testing and control of radio electronic equipment, and the phased installation of its equipment began. The laboratory will allow supervision and control of the radio electronic equipment distributed on the market and used in Bulgaria for verification of its compliance, as required by Directive 2014/53/EU of the European Parliament and of the Council of 16 April 2014 on the harmonisation of the laws of the Member States relating to the making available on the market of radio equipment and Directive 2014/30/EU of the European Parliament and of the Council of 26 February 2014 on the harmonisation of the laws of the Member States relating to electromagnetic compatibility.

CONCLUSION

Continuing the trend observed in recent years, the electronic communications sector continued to develop in 2025 within a dynamic and competitive environment characterised by accelerated digital transformation, growing demand for high-quality and reliable services, and the increasing importance of connectivity as a driver of economic and social development. This environment, in turn, presented significant challenges, including the need for continued investment in infrastructure, efficient management of scarce resources, and the adaptation of the regulatory framework.

Against this background, CRC continued to fulfil its role as an independent regulatory authority by pursuing a consistent and predictable regulatory policy, aligned with market developments and the priorities of the European digital policy.

One of the CRC's key priorities for the coming year will be to conduct new public consultations on the future use of the available spectrum resources in the 1.5 GHz, 2.6 GHz, 3.6 GHz and 26 GHz frequency bands.

In line with national and European priorities, CRC will also continue in 2026 to transpose into Bulgarian legislation the European Commission's implementing decisions on the harmonised use of the radio spectrum.

In order to facilitate the introduction of new services to the market for the benefit of end-users, the Commission will continue its work in supporting the activities of exploring and studying the possibilities for the introduction of 6G, and, if free resource is available, it will issue temporary authorisations for the use of radio spectrum for a short-term project.

An important future priority for the performance of the Commission's supervisory functions is the commissioning of the EMC Laboratory and its further equipping with specialised equipment for verifying the compliance of radio equipment with the applicable EMC regulatory requirements. This will allow for a wide range of tests to assess the compliance of products, in relation to the control of the product market with regard to EMC and the provision of conditions for favourable business environment and normal operation, without harmful interference, to the lawful users of radio spectrum.

In fulfilment of its regulatory functions and its commitments to international organisations in the field of electronic communications, the Commission will continue the activities of collecting, processing and validating data on the development of electronic communications networks and/or services in the Republic of Bulgaria. CRC plans to review the indicators currently used to monitor developments in the electronic communications market in the context of the European Commission's proposed Digital Networks Act and, in particular, the provisions set out in Part VIII thereof establishing a comprehensive framework for the harmonised provision, exchange and publication of information, as well as requirements for the collection of proportionate, justified and timely information from undertakings and the conduct of regular geographical surveys on network deployment and forecasts.

In line with the current regulatory framework and the regulatory authority’s obligations to carry out an analysis of the state of the relevant market, the work on the analysis and assessment of the wholesale market for the provision of local access at a fixed location will continue.

Another important priority for 2026 will be the participation of CRC experts in the work of the interdepartmental working group responsible for preparing the Republic of Bulgaria for participation in the ITU World Radiocommunication Conference 2027 (WRC-27).

CRC will continue to build on the progress achieved to date, placing particular emphasis on the practical implementation and further development of the regulatory framework for digital services. In fulfilling its responsibilities as the Digital Services Coordinator (DSC) under the Digital Services Act (DSA), the CRC will undertake measures to develop and implement procedures for the certification of trusted flaggers, the designation of out-of-court dispute settlement bodies, and the establishment of mechanisms for the vetting of researchers. In parallel, the Commission will continue to strengthen its administrative capacity, deepen its cooperation with national and European institutions, and contribute to the effective functioning of the Digital Single Market. Through these actions, CRC will contribute to the development of a secure, transparent and resilient digital environment that serves the interests of both consumers and businesses.

The information presented in this Annual Report provides an objective account of the Commission's achievements during 2025. The results presented demonstrate that, overall, the objectives and tasks set out in the Strategic Plan for the year have been successfully accomplished. Building on these achievements, CRC will continue its work in 2026 towards fostering an effective and future-oriented regulatory environment, a sustainable and competitive market, and consumer protection - an environment that supports the continued development of the sector and responds to the evolving needs of the digital society.