SUMMARY PROJECT FICHE

1. Basic Information

- 1.1 Désirée Number: BG 0003.01
- 1.2 Title: STRENGTHENING THE REGULATORY FRAMEWORK FOR TELECOMMUNICATIONS
- 1.3 Sector: Internal market
- 1.4 Location: Bulgaria.

2. Objectives

2.1 Wider Objective

To prepare Bulgaria to enter in the Internal Market by reinforcing its institutional capacity to manage the acquis communautaire in the field of telecommunications.

- 2.2 Immediate Objective
- To develop STC into a modern, efficient, effective and functioning National Regulatory Authority according to Bulgarian Law and the *acquis communautaire*.
- 2.3 Accession Partnership and NPAA priority

The Accession Partnership contains the following medium-term priority in the area of the internal market:

• Telecommunication: strengthen the capacity of the national regulatory authorities.

The NPPA contains the following medium-term priority:

- Continuous implementation of free and fair competition in the communications industry through:
- further development and improvement of the legal framework, in accordance with European directives;
- development and strengthening of institutions applying and enforcing the legal framework.

3. Description

3.1 Background and justification

In preparation for EU accession, Bulgaria has undertaken a fundamental restructuring of its telecommunications sector since 1991. Important measures taken include:

- Separation of operational management from regulation and the establishment of the Committee of Posts & Telecommunications and the Bulgarian Postal & Telecommunications Company;
- Separation of postal from telecommunications operations and creation of the Bulgarian Postal Company and the Bulgarian Telecommunications Company as joint stock companies;
- Liberalisation of the telecommunications market in certain areas and opening up the market to new operators;
- Adoption and implementation of the new Telecommunications Law in preparation for full liberalisation on 1 January 2003.

The Telecommunications Law, approved on 27 July 1998, stipulates that telecommunications activities in Bulgaria are to be managed by three organisations:

- Committee of Posts & Telecommunications (CPT)
- State Telecommunications Commission (STC) and
- National Radio Frequency Council (NRFC).

CPT was responsible to the Council of Ministers for sector policy in the field of telecommunications and the ownership of wholly or partly state-owned enterprises in the telecommunications sector was vested in CPT. In December 1999 CPT, along with its ownership rights, was absorbed into the Ministry of Transport & Communications (MTC).

State Telecommunications Commission

The Telecommunications Law established STC as the National Regulatory Authority in the field of telecommunications. STC is functionally separate from MTC and has a full range of regulatory functions, distinct from MTC's policy and public ownership functions. STC's responsibilities include:

- preparing licence documentation and conducting tender procedures for its granting;
- granting, amending, supplementing, suspending, terminating and revoking licences for telecommunications activities, networks and services, and radio and television activities;
- regulating telecommunications activities with respect to maritime / air search and rescue and safety information;
- supervising and investigating the market, and in particular setting the regulatory framework for interconnection, supervising interconnection negotiations and agreements, and mediating between parties;
- preparing and promulgating the national numbering plan;
- drafting, co-ordinating and proposing secondary legislation;

- informing the public and carrying out public consultations and opinion polls on important telecommunications issues;
- managing frequency spectrum and frequency monitoring control;
- dispute resolution.
- administering the obligations of the operators as regards data protection in the telecommunications sector, as per licence's conditions

Several entities share with STC responsibility for frequency allocation, including the NRFC, and their respective roles need to be clarified. The respective roles of STC and the Commission for Protection of Competition (established in 1998) for the resolution of disputes in the telecommunications sector also need clarification.

STC also has regulatory responsibilities for the postal sector but assistance from this project does not cover this aspect.

Under Article 37(1) of the Telecommunications Law, STC's revenue is raised from a combination of licence fees, annual fees for scarce resource utilisation, 20% of fines and property penalties as set out in the Law, 5% of initial licence fees and 30% of annual radio frequency fees for licences issued under the Law; and accrued interest, donations and revenues from other STC activities.

Structure of the Bulgarian telecommunication market

The market for telecommunications services has been considerably liberalised but a strong incumbent state-owned operator, Bulgarian Telecommunication Company (BTC), dominates the market. BTC has been accorded exclusive rights for fixed line telephony until 31 December 2002. In this situation, STC needs to make great efforts to build up its institutional capacity and regulate the market in an appropriate manner.

During 1999, Bulgaria initiated public procedures to identify a strong foreign strategic partner to invest in and improve the competitiveness of BTC, prior to full liberalisation. It is expected that this process will be concluded sometime in 2000 and will result in investments to extend and modernise the fixed telephone network.

Bulgaria has committed, through its sector policy and the provisions of the Telecommunication Law, to liberalise fully its telecoms market by 1 January 2003. In view of this, STC is striving to improve its capacity to ensure, in a pragmatic way, a stable, consistent, objective, equitable and transparent regulation, conforming to the EU *acquis*.

Apart from the incumbent operator, BTC, whose monopoly rights in national public telecommunications networks and international and domestic telecommunications services last until 31 December 2002, there are a number of other operators in the market :

1. GOCIS (Global One Communications and Information Services Ltd.)

GOCIS is a joint-venture of Global One Communications Ltd (60 %) and BTC (40%). The company offers a range of services, including X.25 data network, Global Frame

Relay, end-to-end managed services, X.400. This company is one of the biggest Internet access providers in the country.

2. Radio Telecommunications Company (Mobikom)

The Radio Telecommunications Company is a joint venture of Cable & Wireless (49%), BTC (39%) and Radio Electronic Systems (12%), trading under the brand name Mobikom. It is the only operator of the analogue cellular phone network, using the NMT 450i standard. Mobikom's license was issued in 1993 and it provides paging services, value-added services, wireless local loop services and Internet access as well.

3. MobilTel

MobilTel AD is a joint stock company and is the first and, so far, only GSM operator in Bulgaria. Its licence was issued in 1994. In 1999, MobilTel established a company M-Tel Net AD specifically to provide Internet access and related services.

4. Packet Switched Data Networks (PSDNs)

There are three PSDNs in Bulgaria, operated by BTC, GOCIS and Bankservice. BTC is operating an ATM network in Sofia and two other cities.

The licence for a second GSM operator is part of the negotiations with the Strategic partner in BTC and will be awarded as soon as the process is concluded.

Issues to be addressed by the project

STC's task of regulating the telecommunications market and preparing for its full liberalisation poses a considerable challenge, due to the lack of experience and skills at STC. This is particularly true as regards the economic and legal aspects of market regulation. Moreover, STC considers that its internal organisation needs review to improve efficiency and eliminate bottlenecks that might hinder its regulatory activities in the context of a liberalized market. Without the know-how, experience and confidence to deal with a fully liberalised market sector, there is a serious likelihood that STC will be unable to regulate anti-competitive behavior of market players.

Specific issues to be addressed during the project include:

- STC personnel do not have direct experience of regulating the telecommunications market. The most important problem to be addressed is to ensure that the personnel have the required skills, both through training and through hiring appropriately qualified new personnel from the resources currently available.
- STC decision making procedures and responsibilities need to be defined.
- STC is set up through its legal basis to be independent. STC must be trained to act independently of any organisation involved in telecommunications operations (including MTC, as long as MTC exercises significant ownership rights).

- Doubt has been expressed about the clear separation of responsibilities of the organisations concerned with the management of the telecommunications sector in Bulgaria. The roles of these institutions will be reviewed and clarified to the satisfaction of the involved parties, and any necessary legal amendments will be drafted and proposed to MTC. This includes ensuring that STC is given the powers by law to regulate the market as required under EU *acquis*.
- Secondary legislation will be developed to bring Bulgarian legislation into conformity with EU *acquis* by 1 January 2003. Legal texts for services that will be implemented after this date (eg. number portability and completion of carrier selection) will also need to be drafted.
- Procedures for implementing all active legislation, including market surveillance, will have to be developed.
- STC will need to complete the upgrading of its frequency management capabilities by acquiring spectrum monitoring equipment and software, and refining procedural approaches. For efficient operation, both fixed and mobile equipment is needed.
- STC should enhance its website and develop other procedures for informing and consulting the public, in line with its remit and to make its operations more transparent.
- Market surveillance procedures, in conformance with the R&TTE Directive, need to be adopted.

3.2 Linked activities

- 1991 Phare programme (BG 9104): Evaluation of the telecommunication infrastructure in Bulgaria. The project provided the framework for restructuring the telecommunications sector and the basis for reorganising BTC.
- 1993 Phare programme (BG 9309): Assistance to CPT for the construction of modern telecommunication services in Bulgaria.
- 1993 and 1994 Phare programmes (BG 9309 and BG 9410): a series of projects in frequency monitoring and spectrum management involving acquisition of necessary upgrading software to complete the frequency management system.
- CPT was the beneficiary of a World Bank Technical Assistance Loan for \$1.4 million to finance a study on policy and regulatory improvements.

3.3 Results

Component 1 - Strategic planning

A strategic plan, to be implemented in Component 2, that covers:

- Institutional restructuring
- Training and systems audit needs
- Proposed amendments to primary legislation,

- Planning and development of secondary legislation,
- Regulatory procedures to be used
- Transparency and public relations.

Component 2 - Implementation of the adopted strategic plan

- Enhanced performance and effectiveness of STC, through the improvement of its functional management, the width of in-house professional skills and harmonised relations with other state and international bodies.
- Drafting of amendments to the primary law, and drafting secondary legislation (especially setting the regulatory framework for interconnection and monitoring its implementation).
- Implementation by STC of comprehensive portfolio of regulatory policies and relevant Procedures according to the responsibilities given to it by the Telecommunication Law and in line with EU practices
- Improved capability to allocate frequencies and monitor frequency use.
- Strengthened STC capacity in the areas of: drafting and administration of licences; preparing a National Numbering Plan and allocating numbers; tariff regulation of dominant suppliers; ensuring fair competition and resolution of disputes (in cooperation with the Bulgarian Competition Authority as appropriate); administering the obligations of the operators as regards data protection in the telecommunications sector, as per licences's conditions; regulating radiocommunications and network aspects of radio and television broadcasting according to the relevant legislation.

3.4 Activities

Component 1 - Strategic planning

This activity will focus on preparation of an institutional review and strategic plan, in full consultation with STC. This institutional review will include:

- Assessment of the management structure of STC, to identify overlaps, areas of conflicts and bottleneck in decision-making procedures and provide recommendations for their resolution in light of the responsibilities given to STC under the Telecommunications Law. The assessment will also identify ambiguities in the relationships between STC and other relevant state bodies (including issues of independence from the incumbent operator) and provide recommendations for their coherent harmonisation.
- Identification of STC's needs for a Management Information System, and development of a detailed plan for its implementation, covering technical and organisational requirements. STC will finance the implementation of the agreed MIS plan.
- Critical analysis of existing and proposed legislation and identification of requirements for amendments to primary legislation and additional secondary legislation, including an agreed timetable with STC.
- Formulation of costing methodologies for tariff setting and predicted timetable for balancing fees and tariffs.
- Assessment of equipment and software requirements for frequency monitoring operations and agreement on an investment plan to fulfill this task in the medium

and long term. Recommendations on how to raise the necessary finance for these investments will be included in the plan.

Support will then be given to STC to develop a strategic plan, based on the findings of this institutional review. The plan will cover the all the aspects listed above and will identify priority actions, a timetable for the steps to be undertaken and the necessary resources. The plan will be proposed to STC top management for adoption and subsequent implementation in the following component.

Component 2 - Implementation of the adopted strategic plan

This activity will focus on the detailed implementation of adopted strategic plan including:

- Support for the internal re-organisation of STC along the optimal model agreed.
- Functional training in core management skills including strategic decision making, financial, economic and administrative activity, human resources purchasing logistics, market intelligence, press and public relations, and international relations.
- Organisation of seminars, workshops and in-post task orientated training, traineeships and study visits for experts to EU NRAs and other institutions (as appropriate) for core functions operational staff.
- Support for the development of necessary amendments to the primary legislation and additional secondary legislation.
- Procurement, adoption and implementation of Management Information System. The twinner will be expected to advise and assist in this process.
- Implementation of an appropriate and comprehensive portfolio of policies and procedures including overall audio-visual policy; conformity assessment and the requirements of the R&TTE Directive; data protection and telecommunications; sector management and competition; tariff setting, including cost-modelling principles and implementation; licensing policies and practice; frequency management policy and practice, including spectrum allocation, co-ordination and management; acquisition of appropriate specialist software; spectrum monitoring and control; interconnection regime; and dispute resolution policy and practices.
- Implementation of the frequency monitoring function of STC, including the development of technical specification and procurement of the necessary equipment and software for frequency monitoring. Support for the installation and commissioning of frequency monitoring equipment and software and develop staff training as appropriate. The twinner will be expected to play an active role in supervising and implementing this activity.

4. Institutional Framework

The beneficiary of the project is the State Telecommunications Commission (STC). STC currently comprises six directorates:

- Licensing policy and permission activity ("Licensing")
- Frequency spectrum management and electromagnetic compatibility ("Spectrum Management")

- Standardisation and type approval of terminal equipment, activities that are now being migrated to conformance assessment and R&TTE Directive requirements ("Conformance Assessment")
- Telecommunications control, including radio frequency monitoring ("Telecommunications Control")
- Legal and normative regulation and international relations ("Legal & International Relations")
- Financial, economic and administrative activity ("Finance & Administration").

It is expected that the project will lead to a revision of STC's structure to maximise its effectiveness in performing regulatory duties.

STC will appoint before the project begins a senior official as Project Leader who will be responsible for overseeing all aspects of project implementation. STC will also establish a Project Steering Committee chaired by the Chairman of STC and with the participation of Directors of all directorates.

STC will provide the consultants delivering the project with the necessary office space, equipment, general administrative support and access to senior officials to ensure successful implementation of the project.

5. **Budget**

	Phare Support		Co-Fina	TOTAL			
Investment	Institution	Total Phare	National	IFI			
Support	Building		Co-financing	Co-			
				financing			
(I)	(IB)	(=I+IB)					
	Contract 1: Consultancy						
0	1,750	1,750	0		1,750		
	Cont	ract 2: MIS equ	uipment				
0	0	0	200		200		
Contro	act 3: Frequen	cy monitoring e	equipment and so	ftware			
700	0	700	1,000		1,700		
700	1,750	2,450	1,200		3,650		

Detailed Budget (hundred thousand euro)

The cost of MIS equipment, estimated at 200,000 euro, will be financed entirely by STC. The cost of the frequency management equipment, estimated at 1,700,000 euro will be partly financed by Phare up to a maximum of 700,000 euro. If the total cost exceeds 1,700,000 euro, STC will finance the difference. The consultant will advise STC in both procurement contracts.

6. Implementation Arrangements

6.1 Implementing Agency

Central Finance & Contracting Unit, Ministry of Finance.

6.2 Twinning

Not applicable.

6.3 Non-standard aspects

The rules and procedures outlines in the DIS Manual will strictly be followed. Since the software for frequency planning included in the third contract (procurement) is highly specialized and should be compatible with the one already delivered under another PHARE project, a direct agreement procedure might be foreseen.

For elements funded by STC, the Commission is bound by procurement procedures set out in the Bulgarian Public Procurement Act 1999 (OG No. 56/22.06.1999). This statute is based on the European Procurement Directives.

6.3 Contracts:

There is a single project, split into three Contracts as follows:

- Contract 1: (Consultancy) 1,750,000 euro (Phare)
- Contract 2: (MIS equipment) 200,000 euro (non Phare)
- Contract 3: (FM equipment) 1,700,000 Euro (partly Phare)

7 Implementation Schedule

7.1 Start of tendering/call for proposals

Terms of Reference for both contracts mid-May 2000.

7.2 Start of project activity

Expected date of commencement of first contract: 1st December 2000. Project start date: December 2000.

7.3 Project Completion

December 2002.

8 Equal Opportunity

• Equal participation in the project by men and women will be assured. There will be no restrictions as of gender, ethnic, religious, or political affiliation.

9. Conditionality and sequencing

Conditionality

- Continued commitment of the Government of Bulgaria to full liberalisation of the telecommunication market by 1 January 2003.
- Progressive adoption by the Council of Ministers of necessary amendments to the legislation to bring it into line with EU acquis. (Note that STC can only propose changes in the Telecommunications Law.)
- Provision of necessary resources from the state budget (financial years 2001-2003) for project co-financing.
- Respect for the independence of STC by all government entities, including MTC as long as it exercises ownership rights in operators in relevant markets.

Sequencing

• The Project will be a logical continuation of previous assistance financed by Phare and other Donors.

Annexes to Project Fiche

- 1. Logical framework matrix
- 2. Detailed implementation chart
- 3. Contracting and disbursement schedule

Annex 1 to Project Fiche	Programme name: and number: PHARE 2000						
LOGFRAME PLANNING MA Institution building for the Bulgarian State capacity to manage the acquis communauto	Contracting period expires: 31.12.2002	Disbursement period expires: 31.12.2003					
Project Number			Total Budget: 3,650,000 euro	Phare contribution: 2,450,000 euro			
Wider Objective(s)	Indicators of Achievement*	How, When and by Whom Indicators will be measured	Assumptions and Risks				
1. To prepare Bulgaria to enter the Internal market by reinforcing its institutional capacity to manage the <i>acquis</i> <i>communautaire</i> in the field of telecommunications and to develop STC into a modern, efficient, effective and functioning National Regulatory Authority within the scope of the <i>acquis</i> <i>communautaire</i> .	 Telecommunications Legislation compatible with EU. STC able to manage the <i>acquis</i> <i>communautaire</i> and to implement and enforce Telecommunications policy. Implementation of effective management, monitoring and control of frequency spectrum 	 Annual review by the DG-External Relations and DG-Enlargement on accession results under the Accession partnership and NPAA Progress Reports from the pre- accession advisers on telecommunications. 	 economic shoc 2. No further privatisation o 3. Political supreinforcement STC; 4. Co-financin support available 	oostponement of f BTC. oport to of powers of g/other local			
Immediate Objective (Purpose)	Indicators of Achievement*	How, When and by Whom Indicators will be measured	Assumptions	and Risks			
To develop STC into a modern, efficient, effective and functioning National Regulatory Authority according to Bulgarian Law and the <i>acquis</i> <i>communautaire</i> .	1. Satisfaction of Bulgaria's obligations with respect to telecommunications regulatory principles under the <i>acquis</i> <i>communautaire</i>	 Annual review by the DG-External Relations and DG-Enlargement on accession results under the Accession partnership and NPAA Progress Reports from the pre- accession advisers on telecommunications. 	 of activity between S CPC and N Trans-disc functional co-ordinat 	cipline and cross- co-operation and			

Results	Indicators of Achievement*	How, When and by Whom Indicators will be measured	 Adoption by the CoM of amendments to legislation including full functional independence of STC and political support to reinforce powers of STC; Provision of project co- financing resources from the state budget Assumptions and Risks
 Component 1 – Conceptual A strategic plan, to be implemented in Component 2, that covers: Institutional restructuring Training and systems audit needs Proposed amendments to primary legislation, Planning and development of secondary legislation, Regulatory procedures to be used Transparency and public relations. Component 2 – Implementation Enhanced performance and effectiveness of STC, through the improvement of its functional management, in-house professional skills and harmonised relations with other state and international bodies. Drafting of amendments to the primary law, and drafting secondary legislation (especially setting the regulatory framework for interconnection and monitoring its implementation). 	 STC Testfuctured including Tessetting staffing levels and levels of authority (individual and functional). Responsibilities balanced across functional and qualification of staff matched wit job requirements. New or amended telecommunication sector legislation introduced. Tariffs, licence fees, and interconnection fees re balanced. Component 2. Increased Management skills and relationships with external bodies. Increase in Staff skills, efficiency, and motivation; Inter-divisional working and co-operation Frequency management software commissioned 	 Progress Reports from the pre- accession adviser on state aid. Project monitoring reports Delegation reports New legislation adopted by Council of Ministers in due time. Willingness of financial institutions/funding sources to provide finance for expansion of frequency monitoring system. Publication of Reference Interconnection Offer in Official Gazette 	 Freeing up of under-used and unused spectrum by the Military in Bulgaria Council of Ministers unwilling to adopt legislation in due time.

 Implementation by STC of comprehensive portfolio of regulatory policies and relevant Procedures according to the responsibilities given to it by the Telecommunication Law and in line with EU practices Improved capability to allocate frequencies and monitor frequency use. Strengthened STC capacity in the areas of: drafting and administration of licences; preparing a National Numbering Plan and allocating numbers; tariff regulation of dominant suppliers; ensuring fair competition and resolution of disputes; administering the obligations of the operators as regards data protection in the telecommunications sector, as per license's of radio and television broadcasting according to the relevant legislation. 	 Frequency monitoring equipment and software installed and commissioned STC Participation in [3] international Committees Publication of harmonised National Frequency Plan, National Numbering Plan and Reference Interconnection Offer 		
Activities	Outputs	Inputs	Assumptions and Risks
 Component 1 - Strategic Planning Preparation of an institutional review and strategic plan, in full consultation with STC to be implemented in Component 2, covering recommendation for the decision- making rationalisation, elimination of ambiguities in the relationships between STC and other relevant state bodies, planning for a Management 	 Component 1. Strategic action plan adopted by STC, with the identification of priority actions, a timetable for the steps to be undertaken and the necessary resources. Component 2. Internal reorganisation of STC and enhanced effectiveness of its 	 Inputs from consultants in: Management Regulatory Legislation drafting Frequency management and planning Economic and costing Web site creation and management Bulgarian experts (from STC, 	 Availability of STC staff at all levels to participate in workshops and training programmes; and to co-operate with requirements of team of experts work during investigative stage of studies.

Information System, formulation of costing methodologies for tariff setting, equipment and software requirements for frequency monitoring operations and harmonisation of legislation and fees and tariff levels with relevant EU Directives.	 regulatory activities Increased of internal Management skills and relationships with external bodies. Publication of harmonised National Frequency Plan, National Numbering Plan and Reference Interconnection Offer 	 Ministry of Transport & Communications), CPC, NRFSC, NRTVC and other external local experts Policy guidance through Commission of STC, EU and Phare Representatives [or delegated Steering Committee)] 	 2. Design of future training programs should reflect and incorporate need for training on: general regulatory concepts and practices; and more specialised training, in depth, in different profiles such as:
Component 2 - Implementation of the adopted strategic plan	• Acquisition and installation of frequency monitoring equipment and software within STC's	• Allocation of time and commitment of policy makers, Directors, members of STC and other trainees	TechnicalLegal; andEconomic knowledge
This activity will focus on the detailed implementation of adopted strategic plan including:	premises.	• Technical and presentation facilities and office equipment	
• Support for the internal re-organisation of STC along the optimal model agreed.		• Training material and seminar folder	
 Functional training in core management skills. Organisation of seminars, workshops 		4. Seminars, workshops and in-post task orientated training and study visits for experts to EU NRAs and	
and in-post task orientated training, traineeships and study visits for experts to EU NRAs and other institutions (as appropriate) for core		other institutions	
 functions operational staff. Support for the development of necessary amendments to the primary legislation and additional secondary legislation. 			
• Procurement, adoption and implementation of Management Information System.			
• Support for the implementation of an appropriate and comprehensive portfolio of policies and procedures.			

• Implementation of the frequency monitoring function of STC, including the development of technical specification and procurement of the necessary equipment and software for frequency		
monitoring.		

ANNEX 2 - Detailed Implementation Schedule

	Τ		Y	ear	1					Year	: 2	
Strategic Planning		ſ										
A.1(1): Institutional review and production of a strategic plan.												
A.1(2): Assess STC management structure. Develop administrative structural model												
A.1(3): Assess external relationships of STC												
A.1(4): Analysis of legislation												
A.1(5): Costing methodologies for tariff setting						-						
A.1(6): Frequency monitoring equipment/software needs; fund raising methodology						-						
A.1(7): Development of high level management plan to implement structural model.						-						
Implementation of the adopted strategic plan								Т				
A.2(1): Implement Strategic plan for optimisation of administrative structural model	Γ				Π			Γ				
A.2(2): Functional training in core management skills					Π		П					
A.2(3): Seminars, workshops and in-post task orientated training and study visits												
A.2(4): Select, procure, adopt and implement Management Information System					Π			Γ				
A.3(1): Implement Policies and Procedures					Π			Γ				
A.3(1): Acquire frequency management software	T											
A.4(1): Acquire frequency monitoring equipment & software	T											
A.4(1): Implement frequency monitoring function												

The activity shown in Implementation (Consultancy) Y1, M1 and Strategic Planning Y1, M4 is project kick-off and hand-over respectively.

		20	01			2002						
	<i>Q1</i>	Q2	Q3	Q4	<i>Q1</i>	<i>Q2</i>	Q3	Q4				
Contracting	1750	1950	1950	1950	3650	3650	3650	3650				
Contract 1 (Consultancy)	1750	1750	1750	1750	1750	1750	1750	1750				
Contract 2 (MIS equipment)	0	200	200	200	200	200	200	200				
Contract 3 (FM equipment)	0	0	0	0	1700	1700	1700	1700				
Disbursement	220	540	860	1080	1800	2520	3240	3650				
Contract 1 (Consultancy)	220	440	660	880	1100	1320	1540	1750				
Contract 2 (MIS equipment)	0	100	200	200	200	200	200	200				
Contract 3 (FM equipment)	0	0	0	0	500	1000	1500	1700				

Annex 3 – Cumulative contracting and disbursement schedule by quarter for full duration of programme (hundred thousand euro)