POLAND
Throughout the first set of questions (on the evaluation of Data Retention Directive) the expression "country" is used to denote the fact that the addressees of the questionnaire are not only the EU Member States, but also non-EU EEA States.

1 Questions to Member States And by EEA States

1.A Qualitative and quantitative aspects of the application of Directive 2006/24/EC, taking into account further developments in electronic communications technology and the statistics provided pursuant to Article 10,

1.A.1 Law enforcement issues

1.A.1.a Total number of requests that arc issued by year to obtain data retained under the DRD [Quantitative Reply]

1.A.1.b Number/Percentage of these requests that are generated by type of requesting authority: 1.police. 2.judicial and 3.other authorities (please specify) [Quantitative Reply]

1.A.1.c What is the average age of the data that are requested? [Quantitative Reply]

1.A.1.d Which communication channels are used to exchange information between law enforcement authorities and service providers (e-mail, fax, secure network, or other channels)? If certain channels are required to be used, please provide information about the channels to be used

E-mail, fax, post, web service

1.A.1.e Type of crimes

1.A.1.e.1 For what types of serious crime does the national law authorise the use of retained data? Please provide a list of these crimes

All categories of crimes

1.A.1.e.2 What is the average age of the data that has been requested for the different types of crime mentioned under 1.A.1.e.1? [Quantitative Reply]

1.A.1.e.3 Does the national law transposing the Directive or related instruments, allow the storage and use of retained data for purposes other than the investigation, detection and prosecution of serious crime (e.g. copy right infringements). If so, please provide details about the alternative purpose(s).

Each of the acts filling the characteristics of a prohibited act under Criminal Code

1.A.1.f Assessment of the data to be retain

1.A.1.f.1 Does the national law transposing the Data Retention Directive or a related instrument, require the storage of other categories of data different from the data contained in Article 5 of the Directive? If so, please provide details about the additional data that should be retained as well as the instrument in which this obligation is enshrined.
1.A.1.f.2 Adequacy and law enforcement relevance of the data retained under Article 5 of the Data Retention Directive

Please indicate whether the data service providers must retain under Article 5 of the Directive are relevant and sufficient from a law enforcement perspective, and mention which data either should be removed from the list of Article 5 where redundant or be added where relevant data is not yet retained. Member States are requested to motivate their answer and provide examples of situations that demonstrate the redundancy or the flaw.

1.A.1.g Details of the requests that are issued

1.A.1.g.1 The kind of information that service providers are requested to retrieve; what are typical request profiles (i.e. typical content of a request, for instance: provide a chronological listing of calls from or to a certain subscriber number, provide an overview of the relations between numbers of users or subscribers; provide statistics about the number of calls and about peaks in communication to and from destinations)? Please provide information about the type of search parameters (information selection criteria) contained in the request, e.g. listing of the communications made from or to a given phone number, or on certain date, or at a certain hour, or listing of all calls made from a certain location, or of all numbers used by an identified user.

1.A.1.g.2 Did your country standardize the interaction with communications service providers? If so, please provide information about the standard (form or format) for requests, the message format, the technical modalities and/or interface.

1.A.1.g.3 Please provide quantitative information about the use of the different request profiles (number or percentage/ratio of a given search profile as part of the total number of requests stated under 1.A.1.a. [Quantitative Reply]

1.A.1.h Details of the replies to the requests motioned under 1.A.1.g

1.A.1.i What is the average [Quantitative Reply]

1.A.1.i.1 time between the issuing of a request and the reception of an answer?
1.A.1.i.2 number of requests that are answered within a stated time frame?
1.A.1.i.3 Number of requests that do not respect the stated time frame?

1.A.1.j Time frames

1.A.1.j.1 Does your country require that answers are provided within a certain time frame?
No
1.A.1.j.2 If so, how does your country ensure that this time frame is respected?
not applicable
1.A.1.j.3 What is a typical timeframe for answers? Does this period vary in relation to the different request profiles identified under 1.A.1.e.1? [Quantitative Reply]
1.A.1.j.4 Does your country require that replies are provided in a certain form or format? If so, please provide information about the standard form or format, including statistical information about the typical formats.

No

1.A.1.j.5 Does your country require the use of hand over/off standards? If so, what standards are used?

No

1.A.1.k Reimbursement of costs

1.A.1.k.1 Does your country reimburse CAPEX\(^1\) and/or OPEX\(^2\) incurred by service providers? If so, please provide information about the type of costs that are reimbursed, as well as about the modalities and amount or ratio of reimbursement.

No

1.A.1.k.2 Does your country make the reimbursement of costs conditional on the respect of certain conditions such as, for instance, guaranteeing a certain quality of service (request profiles, amount of requests to be handled, speed of retrieval)? If so, could you please provide information about the conditions that service providers have to meet and the link between reimbursement scheme.

No

1.A.1.l Effectiveness — What is the success rate of the use of retained data

1.A.1.l.1 Did the use of retained data allow to solve crimes that would not have been solved otherwise. If so, please provide examples [can entail Quantitative Reply]

1.A.1.l.2 How much does the use of retained data cost your Country in terms of deployment of Human Resources and acquisition and maintenance of dedicated equipment? What are the typical cost drivers? [can entail Quantitative Reply]

1.A.1.l.3 Did your Country set law enforcement targets (priorities) to achieve within a given period? If so, what is the contribution that is being made by the use of retained data in relation to achieving these targets? What is the degree of cost-effectiveness when comparing the cost for obtaining and processing retained data and the achievement of law enforcement results? How can cost-effectiveness be increased? [entails Quantitative Reply]

Prosecution is the only priority for law enforcement. There are no statistics on the contribution of the data received in respect of retention achieved objectives, costs, profitability body asker.

1.A.2 National and transnational requests and answers

\(^1\) CAPEX or CapitaL Expenditure, are expenditures creating future benefits. In concrete terms it is the cost of developing or providing non-consumable pens to the product or system, and may also include the cost of workers and facility expenses such as rent and utilities

\(^2\) OPEX or OPerational Expenditure are operating costs or recurring expenses which are related to the operation of a business, or to the operation of a device, component, piece of equipment or facility
1.A.2.a For the sake of this questionnaire, "transnational requests" a distinction is made between two types of cross-border requests: 1. requests issued by law enforcement authorities from other Countries to provide data retained by service providers in your country (incoming requests) and 2. requests addressed by your country to authorities of other Member States (outgoing, requests). 

Having regard to the total number of requests mentioned under section 1.A.1.a: 
1.A.2.a.1 how many (a) incoming and how many (b) outgoing transnational requests are processed by your country on an annual basis [Quantitative Reply] 

1.A.2.a.2 what is the ratio between national and transnational requests (total number of transnational requests)? [Quantitative Reply] 

1.A.2.b What is the average time to: 

1.A.2.b.1 receive an answer to an outgoing request, between the moment of issuing the request and the reception of the answer (see also 1.A.2.f)? What are the elements (for instance: type of procedure) that determine the length of the procedure? [Quantitative elements] 

1.A.2.b.2 provide on answer to an incoming request, between the moment of reception of the request and the sending of the answer? What are the elements (for instance: type of procedure) that determine the length of the procedure? [Quantitative elements] 

1.A.2.b.3 Which strategies could be deployed to reduce the time it takes to answer an incoming request? 

1.A.2.c Which authority takes the decision in your country to issue at transnational request? Are all law enforcement authorities entitled to make or prompt to make a transnational request? 

1.A.2.d Does your country have a central point that issues outgoing requests or receives incoming requests? If so, please provide details about these central points. 

No 

1.A.2.e Costs 

1.A.2.e.1 If your country reimburses OPEX (see 1.A.1.k) do you reimburse national service providers in the same way for replying to transnational requests? Do you or do you plan to ask other Member States to share the costs? 

1.A.2.f Language 

1.A.2.f.1 Does your country impose linguistic conditions to incoming requests (e.g. translation in a national or vehicular language? If so, please provide details about those conditions. 

1.A.2.f.2 What means does your country deploy to comply with linguistic conditions imposed by other countries to outgoing requests? Do you have a central facility to provide linguistic support? 

1.A.3 Telecommunications authorities 

1.A.3.a Allocation of tasks 

1.A.3.a.1 Which national authorities are charged with tasks resulting from the Directive? Which tasks are assigned to which authority?
For tasks under the responsibility of the Directive are:
• Minister of Infrastructure - all with the exception of a directive of the President Office of Electronic Communications (Articles 9 and 10 of the Directive)
• President of the Office of Electronic Communications - in terms of Articles 9 and 10 of the Directive.

1.A.3.a.2 When did/will the respective authorities start to be operational for these tasks?

These tasks are carried out with the entry of relevant legislation in force, ie the Telecommunications Act in July 2009 and the Regulations implementing the Directive, Article 5 - from 1 January 2010

1.A.3.a.3 For each authority: Did/does the authority need to acquire additional expertise in order to perform its tasks under the Directive? Which? How was this implemented (e.g. new staff, reorganisation, special training) or how will it be implemented?

There is a necessity, the employment of additional persons to train existing workers especially in terms of linguistic and operational support systems for retention.

1.A.3.a.4 Does any authority collect data about the economic effects of measures required under the Directive. If the answer to this question is affirmative, please provide details about the authority as well as about the data that are collected? [May entail Quantitative elements]

Regulation implementing Article 5 of Directive came into force on 1 January 2010, also due to the need for businesses to adapt their systems to the telecommunications requirements of the Regulation, in relation to operators and suppliers who worked on the market before January 1, introduced a 6-month transitional period during which they can retain data on the old rules. Such data will therefore be known no earlier than the time to adapt to the requirements of entrepreneurs, ie 1 July 2010

1.A.3.a.5 Does any authority mentioned under this section engage in cross-border cooperation relating to the Directive? If so, please provide details about 1. those authorities 2. the type of action or activity that these authorities undertake in this context [May entail Quantitative elements]

1.A.3.b Do the authorities mentioned under this section gather data concerning the impact of the required measures on competition e.g. on market entry for new operators, on advantages for bigger companies? Please provide details about the kind of data that are being collected! [last par may entail Quantitative elements] Centralised storage of data by Service providers.

Such data are not available yet due to full implementation of the Directive from 1 January 2010

1.A.3.b.1 Does your country have problems (e.g. time to obtain an answer, quality of the reply) to obtain retained data that are stored by service providers outside of your country. Please provide details of problems you may have experienced and means deployed to redress these problems [May entail Quantitative elements]

1.B Evaluation of the effectiveness of existing (non-)legislative measures or technical solutions to ensure traceability of users of communications services, in particular mobile phone lines, opened with prepaid SIM cards (cfr Council Conclusions in Annex)

1.B.1 Law enforcement issues
1.B.1.a Which means (technical, operational) or measures (procedural, law—based) does your country deploy to increase the traceability of users of communication services? Please provide a description of these measures.

1.B.1.b What is the scope of these means or measures in terms of contribution to increasing the traceability of users? Please provide details about the legal justification or administrative motivation and as well as about the scope of these instruments, i.e. whether they are aiming to assist the prevention of crime, or its detection, investigation or prosecution. Which crimes are specifically addressed by the means and measures that your country deploys.

1.B.1.c Efficiency

1.B.1.c.1 Are the measures imposed by your country efficient in terms of achieving the aim for which they have been put in place? Please provide details about results obtained as a results of the deployment of the relevant means or measures [May entail Quantitative elements]

1.B.1.c.2 Did your country access the effectiveness of the measures? If so, please provide details of this assessment.

1.B.1.c.3 What is the added efficiency of the measures deployed by your Member State in terms of improvement of your capabilities to detect, investigate or prosecute of terrorism and other serious forms of crime that go beyond the results obtained with the data obtained under Article 5(1)(e)(2) of the Directive and in particular its paragraph (vi)? [May entail Quantitative elements]

1.B.1.d What are the costs or these measures for the private sector? [Can entail Quantitative elements]

1.B.1.e Should measures be taken at European level to increase the traceability of users of communication devices? if so, which measures should be taken, at European level? How would these measures improve the efficiency of the means and measures that you deploy at national level?

Action at European level is pre-paid registration and the ability to receive data from operators located within the European Union on the last radio contact, the terminal end of the national network. Elongation and alignment retention period retention across the EU sanctions to 2 years.

1.B.1.f Which training or skill-development scheme, if any, does your Member State provide for law enforcement authorities to train them in attributing (linking) end-user devices (e.g. mobile phones) to data that are held by communication providers to identify the end-users?

1.B.2 Telecommunications authorities

1.B.2.a Which imparts on the market do the nums or measures mentioned in section 1.B.1 have?

1.B.2.b Does the authority mentioned in 1.A.3.a.& monitor and enforce national measures on providers or other stakeholders?

1.B.2.c Did the authority mentioned in the previous question investigate any cases of non-compliance with national means or measures? Please provide details, if relevente. [Can entail Quantitative elements]
2 QUESTIONS TO THE EUROPEAN PARLIAMENT AND CIVIL SOCIETY

2.A Assessment of the application of Directive 2006/24/EC, taking into account further developments in electronic communications technology and the statistics provided pursuant to Article 10

2.A.1 Which has been the effect on civil liberties of the use of data retained under the Directive?

2.A.2 Which additional measures (administrative, technical, legal, or other) would be appropriate of offset the negative impact(s)?

2.A.3 Which ones of the measures mentioned under 2.A.2 should be addressed at the level of the European Union?

2.A.4 Should the balance between enhancing security by means of retaining communication data and protecting civil liberties been stricken in a different manner. If so, please provide details how to ensure at better balance as well as the motivation underlying the policy choice. [Can entail Quantitative elements]

2.B Evaluation of the effectiveness of existing (non-)legislative measures or technical solutions to ensure the traceability of users of communications services, in particular mobile phone lines, opened with prepaid SIM cards.

There are measures to enable the tracking of users of telecommunications services, particularly mobile phones, operating on the basis of prepaid SIM cards, however, the effectiveness of such activities is low due to the fact that users are not subject to registration.

2.B.1 Which has been the effect on civil liberties of measures taken at national level to increase the traceability of users?

2.B.2 Which additional measures (administrative, technical, legal, or other) should be taken of offset the negative impacts?

2.B.3 Which ones of these measures should be addressed at the level of the European Union?
3 QUESTION TO NATIONAL DATA PROTECTION AUTHORITIES AND THE EUROPEAN DATA PROTECTION SUPERVISOR (EDPS)

3.A Assessment of the application of Directive 2006/24/EC, taking into account further developments in electronic communications technology and the statistics provided pursuant to Article 10 Please provide information on the distribution of competences of supervisory authorities according to Directives 95/46/IEC, 2002/58/EC and 2006/24/EC.

3.A.1 Do authorities have investigative powers vis-a-vis providers and have there been any cases of complaints etc that have led to supervisory or investigative activities?

3.A.2 Do authorities have investigative powers vis-a-vis public authorities and have there been any cases of complaints etc that have led to supervisory or investigative activities?

3.A.3 Do authorities have the power to audit the compliance of providers and have there been any audits? If so, please provide details about such audits. [Can entail Quantitative elements]

3.A.4 Which problems have supervisory authorities observed with the practical implementation of the Directive? (Legal, practical, other; please provide details) [Can entail Quantitative elements]

3.A.5 Do authorities have experience with the supervision of data that service providers have stored centrally, i.e. either within their jurisdiction or beyond? It so, please provide details about the challenges met in that context, also with regard to data stored outside of the EU/EEA. Please specify in particular the data protection issues that have been addressed that that context and the approach that has been followed to settle the contentious issues. [Can entail Quantitative elements]

3.A.6 Please provide details about case law (jurisprudence), if any, with regard to the implementation or use of the Data Retention Directive or concerning the use of retained data?

3.B Evaluation of the effectiveness of existing (non—)legislative measures or technical solutions to ensure traceability of users of communications services, in particular mobile phone lines, opened with prepaid SIM cards.

3.B.1 Please provide details of the observations made by the data protection authorities with regard to practical needs and privacy issues concerning the traceability of users, in particular of mobile prepaid SIM cards. In case any procedure has been brought against the such means or measures deployed in your country, please provider details about this procedure. [Can entail Quantitative elements]
4 QUESTIONS TO THE PRIVATE SECTOR (ISPs, TELECOM OPERATORS, NETWORK AND CABLE OPERATORS)

4.A Assessment of the application of Directive 2006/24/EC, taking into account further developments in electronic communications technology and the statistics provided pursuant to Article 10.

For all question in this section, please differentiate by type of service if applicable

4.A.1 Does the implementation of the Directive require that operators retain data for a longer period than allowed for business purposes under Directive 2002/58/EC?

TP S.A. Yes: the period of complaint is 12 months and the data must be kept for 24 months.
Polkomtel S.A. Part of the data, which the operators are obliged to keep a redundant from a business point of view, for example, data on unsuccessful attempts to call.
PTC Sp. z o.o. Yes, for 24 months beyond the period allowed for business purposes referred to in Directive 2002/58/EC.

4.A.2 Do national authorities oblige all operators, eg. regardless of size, customer type and number, type of service? If differentiation is applied, please describe the criteria.

All operators are required, regardless of those criteria.

4.A.3 Since when are data retention obligations in force in practice?
Od kiedy zobowiązania związane z przechowywaniem danych wchodzą w życie w praktyce?

General founded in July 2009, full implementation of Article 5 of the Directive from 1 January 2010

4.A.4 Did/Will operators have to invest in infrastructure in order to fulfill their obligations on:

4.A.4.a retaining the data for the period required by national law,

TP S.A. Yes - in the email, registration - Call no effective
Polkomtel S.A. redundant data storage from a business point of view requires an additional investment.
PTC Sp z o.o. Yes, the introduction of 24-month period of data retention has led to the development of information systems for the necessary disk capacity and computing power. Will be required to further invest in infrastructure.

4.A.4.b ensuring the security requirements imposed by the Directive,

TP S.A. Yes: the e-mail is possible through the construction and operation of a dedicated data warehouse, which will meet the conditions for safe storage and retrieval of data
PTK Centertel In the Polish implementation of the Directive (Regulation of 28 December), the lack of precise security requirements (I understand that the respect of confidentiality, integrity, availability of information).
PTC Sp. z o.o. Yes, in particular, should be applied technical and organizational measures, related to access to data, only authorized employees and ensure the destruction of data from the period of detention. AD will continue to invest in infrastructure.

4.A.4.c responding to requests without undue delay. as defined by national law,
TP S.A. Yes: the e-mail - to be dedicated to build a data warehouse,
PTK Centertel Required inputs are estimated at least 11 million PLN. Additional analysis is needed to fully assess the costs. Analysis is difficult, in places not possible due to unclear legal provisions.
PTC Sp. z o.o. Yes, replies to requests without undue delay associated with the need to build the communication system that is used to exchange information with authorized entities, were also necessary organizational changes and strengthening of the regular cell dealing with data sharing.

4.A.4.d ensuring that data are only retained for the purposes defined in the Directive and separated from data used or business operations if necessary.

TP S.A. Yes, traffic data is not effective and the data related to electronic mail will be stored only in conjunction with the Directive.
PTC Sp. z o.o Yes, there was a need to build a database separate from the commercial systems.

4.A.5 Did/Will operators have to implement specific organizational measures and procedures in order to comply with their obligations (sec previous question)?

TP S.A. Yes, registration is unsuccessful calls and e-mail call for the implementation of new functionality and procedures.
PTC Sp. z o.o. Yes, implemented new structures and procedures.

4.A.6 Is it possible to quantify financial impacts of the necessary measures? Lf so, please provide the relevant information to assess this impact.

TP S.A.
1. The cost of implementation at the headquarters of the registration calls are not effective to about 18 million PLN
2. Changes in information systems is the collection of data relating to registration calls are not effective about 1.3 million PLN
3. Dedicated data warehouse to include e-mail about 2 million PLN to this are the cost of storing, processing and disposal of data after a period of validity.

PTK Centertel currently not, ultimately, yes, but it requires time and projects
Polkomtel S.A. implementation responsibilities, as defined in the Directive, requires considerable funding.
PTC Sp. z o.o. Yes, the estimated costs associated with realized projects amounts to some 10 000 000 PLN. Will be necessary to incur further costs associated with the need to develop systems, their maintenance and administration.

4.A.7 Does the reimbursement by national authorities, if any, cover the expenditure necessary for compliance with the Directive?

TP S.A. No: national authorities will not refund any cost to the operator, all costs are borne by the operator.
PTK Centertel currently does not pay, because the national authorities in Poland will not refund anything.
Polkomtel S.A. national authorities did not contribute to the costs incurred by the Polkomtel SA,
PTC Sp z o.o. the national authorities in no way partycypowaly in the cost of implementing provisions of the Directive.
4.A.8 Does necessary legislation and practice provide legal certainty to providers with respect to their obligations concerning the protection of data of their subscribers and users?

TP S.A. Yes
PTK Centertel No
Polkomtel SA ensures adequate protection of their customers
PTC Sp z o.o. We are sure only of what the entity to which data are available. We do not have the possibility to assess the merits of the application and use of data.

4A.9 Have providers received direct requests from authorities in another Member State than that of their establishment? Were their any problems with these requests?

TP S.A. Yes: such requests are rejected with the annotation, for example, the police German, Danish pay for the necessary data by Polish police and then the conclusions are supported. In the "Telecommunications Law" police authorities of other countries are not listed as eligible counterparties
PTK Centertel Directly received no applications. Requests from the authorities of another country were channeled through national institutions.
PTC Sp. o.o. No conclusions were obtained directly from the authorities of another country. Such requests going through the national authorities, there were no problems with their implementation.

4.A.10 Please provide information, differentiated by type of operator etc concerning the elements of section 1.A.1 of this questionnaire.

4.A.11 Which economic effect do providers observe

4.A.11.a on competition,

TP S.A. In the case of such a large operator as TP the costs of implementing the directive reach approximately 22 million PLN and because they are not reimbursed in a natural way would be conducive to the price level for the subscribers of TP and thus less competitive in the market.
PTK Centertel Negatives: the provisions in question are such that large operator is becoming less competitive in relation to the smaller operators.
PTC Sp. z o.o. Negligible, all operators must adapt their systems to the provisions of the Directive, incurring specific costs.

4.A.11.b investment in new infrastructures and services,

TP S.A. We must build the infrastructure for the registration is not effective connections and e-mail every fee budget for investment in new technologies and reduce it by about 22 million PLN
PTK Centertel Increasing expectations and legal requirements in the field of defense and security on the one hand, the lack of reimbursement by the state on the other hand makes it uneconomic to run some services and infrastructure investments for them (especially services, which gains are to be expected only in the longer term)
PTC Sp z o.o. There will be slowing down the implementation of new technologies and services (the depletion of funds for new investments, to comply with additional requirements, the highest priority for regulatory projects). Increase the costs of implementation, especially in the absence of structural solutions (to comply with retention requirements) and the need for speedy implementation of projects.

4.A.11.c retail tariffs? Please provide quantitative information, and where such is not possible, qualitative indicators to allow assessment of the economic effect.
PTC Sp z o.o. It is estimated that the impact on retail tariffs will be small.

4.A.12 Centralized storage of retained data

TP S.A.
1. The additional cost for the billing data of calls that are not effective is about 19.3 million PLN and then comes the cost of storing such data for 24 months and the cost of disposal.
2. From scratch, you must create a data warehouse for e-mail logs and other pertinent data and estimate the cost of their detention and removal.

4.A.12.a Do operators store data at a centralized level outside of the country where the data are generated? If so please provide details about the centralized storage

TP S.A. No
Polkomtel SA, the data stored in the reservoirs of the country.
PTC Sp. z o.o. Data are not stored outside the country in which they are generated.

4.A.12.b Do operators transfer retained data that are stored at centralized level to other countries that are bound by the Data Retention Directive or to third countries?

TP S.A. No
Polkomtel SA does not provide data retention to other countries.
PTC Sp. z o.o. Data are not transmitted to other countries.

4.B Evaluation of the effectiveness of existing (non-)legislative measures or technical solutions to ensure traceability of users of communications services, in particular mobile phone lines, opened with prepaid SIM cards

4.B.1 In how many cases have providers been requested to identify users of pre-paid SIM cards? Which types of requests (find name based on number, or number based on name etc)?

PTK Centertel Subject to confirmation by the legal cell, consent to the transfer of such information.
PTC Sp. z o.o. Is not conducted separate statistics for pre-paid card.

4.B.2 Which means do providers have to identify users of prepaid SIM cards?

PTK Centertel Comply with the provisions of Polish law (telecommunications law) - the possibility of voluntary registration of prepaid
PTC SP z o.o. Identification of members of pre-paid by the operator is limited, we have only data of users who have voluntarily registered.

4.B.3 How effective are these methods, i.e. in which percentage of cases could the user not be identified?

PTC Sp. z o.o. Number of registered pre-paid card is small, the lack of the possibility of verifying the data entered. There have been undoubted cases of incorrect administration.

4.B.4 Please compare to the same questions for contractual (post-paid) customers.

PTC Sp. z o.o. No separate statistics are kept for post-paid card does not have restrictions on the user identification card post-paid by the operator. The user is identified in nearly 100% of cases (it
should be borne in mind the efficiency of the system and reported isolated cases of fraudulent use of documents).