

**Annual Report on Competition Law and Policy Developments in Hungary  
(January – December 2001)**

***1. Legal developments in 2001***

***1.1. Developments in the competition law***

The Hungarian Competition Act (Act No. LVII/1996 on the Prohibition of Unfair and Restrictive Market Practices) entered into force on 1 January 1997 replacing the previous Act No. LXXXVI/1990 on the Prohibition of Unfair Market Practices. The 1996 Act was significantly amended in December 2000. The amendments which entered into force in February 2001 were motivated mainly by the four-year experiences collected with the enforcement of the 1996 Competition Act, indicating the necessity for fine-tuning certain provisions of these rules. The incorporation of some principles established by the law enforcement practice into the Competition Act, the wording and rewording of some definitions proved to be rational, moreover, the investigative powers of the Office of Economic Competition (Gazdasági Versenyhivatal – GVH) were also increased. The most important elements of the December 2000 amendments were as follows:

- certain hardcore-type (price fixing, market sharing) agreements cannot be regarded as agreements falling under the *de minimis* escape of anticompetitive agreements,
- supply-side substitutability is explicitly mentioned as one of the factors to be contemplated in defining the product market,
- individual exemptions for anticompetitive agreements can no more be given for an unlimited period,

- the competition authority can deprive agreements of the benefits of block exemption regulations if certain circumstances exist, and similarly, the benefits attached to the application of *de minimis* rules can be withdrawn if network effects of similar agreements can be observed on the market,
- conditions and obligations can be set for anticompetitive agreements to be exempted and also for concentrations to be authorised,
- the members of the Competition Council (i.e. the decision-making body within the Office of Economic Competition) are nominated for a definite period of time,
- the possibility for the competition authority to inquire sectors of the economy was created,
- the investigatory powers of the competition authority have been strengthened, by introducing the possibility to search private homes and cars (nevertheless the use of this possibility requires a preliminary court judge authorisation),
- by defining the top fines up to 10% of the previous year's turnover, an express hint for the undertakings has been worded into the Act,
- the basis of a possible leniency policy has been established by incorporating “the effective co-operation by the undertaking” among the factors to be contemplated when the Competition Council defines the amount of the fine in the given case.

Several further steps have been taken as regards preparation of new rules for competition:

- the preparation of a new Competition Act which would be parallelly in force had a substantial progress. This law aims at the introduction of the substantive norms of the EC competition law into the Hungarian legal system, by incorporating the translated text of several Rome Treaty provisions as well as some EU Council and Commission regulations and Commission Notices. This law will be applied for anticompetitive practices, which may have effect on trade between the EC and Hungary.
- three block exemption regulations were under preparation during the last months of 2001. These regulations were elaborated in the framework of EC law approximation. They will cover vertical agreements, R&D activities and specialisation agreements. After their entry into force in 2002 they will replace earlier government decrees regulating similar areas.

## **1.2. Institution building**

A Hardcore Cartel Unit was set up in March of 2001. After a short preparation period this unit began its operation in August, with several investigations in different areas of the economy. During the year no final decision has been made.

In 2001 the GVH recruited some new colleagues, mainly young lawyers and economists with good knowledge of integration related issues and at least one foreign language. As a result of this, the staff number increased from 111 to 124.

### ***1.3. Changes in the broader legal environment***

A new **Communications Act** was enacted in 2001 (Act No. XL of 2001), containing rules for both telecommunications and postal services. Although opening up the market for competition began earlier, this Act is an extremely important milestone in developing pro-competitive environment in this sector, since it facilitates the entry of potential competitors. It also has strong impact on the development of the institutional background of the sector by designating the Communications Authority and the Arbitration Committee as bodies mainly responsible for liberalisation. The most important implementing rules have been also enacted, nevertheless, and it is a criticism of the system, they were not applicable at the time of market opening. Consequently, further fine-tuning of the system is necessary in 2002.

A new Act entered into force also for **electric energy** (Act No. CX of 2001 on the Electric Energy). This Act contains special provisions for the acquisition of electric energy concessionaires. The Hungarian Energy Office (the sectoral regulator) has to solicit for the opinion of the competition authority, nevertheless these proceedings of the Energy Office are without prejudice to the proceedings of the competition authority carried out under the Competition Act.

## **2. The institutional and procedural background of the law enforcement**

### ***2.1. The Office of Economic Competition***

The GVH is a public, budgetary institution, which constitutes a separate chapter in the central budget. The GVH reports on its experience gained in the course of its law enforcement practice and issues relating to the development of competition to the Parliament annually.

The President of the GVH is appointed by the President of the Republic, upon the proposal of the Prime Minister. The Vice-Presidents are proposed by the President and appointed by the President of the Republic upon the advice of the Prime Minister. One of the Vice-Presidents is the President of the Competition Council (CC), the decision making body of the GVH. The President of the GVH and the President of the CC may issue non-binding notices/guidelines. Beside the law enforcement in individual cases, the GVH President may initiate investigations of whole economic sectors as well.

## 2.2. *Procedural rules*

A case before the GVH may be started upon the initiation of the parties to an agreement covered by the Competition Act, upon the complaint of undertakings or natural persons whose interests are affected by the anticompetitive behaviour of certain actors of the market, or upon the own initiation of the GVH based on formal or informal information.

At the first phase of the proceedings initiated *ex officio* (own initiation and complaints) the investigator of the designated investigating unit evaluates the facts and may close the file without scrutinizing the case if it is clear that no infringement was committed, the complained behaviour does not fall under the Competition Act, or it does not effect the public interest. In all the other cases the investigator issues a decision on the initiation of the proceedings. Decisions of the investigator about the non-initiation of proceedings can be challenged by an interested party (the complainant) at the Competition Council.

During the investigation, the investigator

- = may enter any of the premises, including vehicles and any land used for the purpose of business activities, of the party,
- = may oblige the party or its representative or former representative, employee or former employee to provide information and explanation orally or in writing, or
- = may collect information on the spot in any other manner,
- = may make copies of or abstracts from documents and furthermore, for this purpose, take possession of them for a period of maximum 8 days.

In the course of investigations started *ex officio*, the subject matter of which is a secret cartel or abusive behaviour, the investigator is entitled to search with a particular purpose, and enter to this end on his own, the premises, including vehicles and any land used for the purpose of business activities, of the party and undertakings having connections with the party. In the course of investigations of this kind the investigator is entitled also to enter and search with a particular purpose the premises used for private purposes or privately used, including vehicles and other land, of any executive official of the party or of any other person who exercises control as a matter of fact. The GVH is bound by professional secrecy.

After the investigation the investigator issues a report on the case and forwards it to the Competition Council. The report contains the name of the parties, the definition of the relevant market, the evaluation of the facts and the proofs. The report ends with a suggestion on the termination of proceedings or the establishment of the infringement etc.

The whole text of the Hungarian Competition Act is available in English at the web site: [www.gvh.hu](http://www.gvh.hu).

### **2.3. *The decision-making process of the GVH***

Decisions in the merits of the case are made by the Competition Council, which is a separate decision-making body within the GVH.

The decision of the Competition Council is mainly based on the report of the investigator and the Council has the right to return the files for further investigations. The Council may adopt interim measures as well. The ultimate decision is reached in or out of trial. The Council may state the violation of the Competition Act, may prohibit the continuation of the conduct which violates the Competition Act, may impose fine on the parties, may oblige them to fulfil certain conditions or obligations or to divest certain assets.

## **3. Law enforcement experiences in 2001**

### **3.1. Restrictive agreements**

- The Act prohibits all kinds of *anticompetitive agreements* (agreements or concerted practices between undertakings and decisions by social organisations of undertakings, which have as their object or potential or actual effect the prevention, restriction or distortion of competition) including vertical-type ones [Article 11]. Anticompetitive agreements are declared by the Act automatically void. Agreements concluded between non-independent undertakings are not covered by this Article and there is a provision about the *de minimis* principle also in the Act [Article 12]. Article 13 defines the notion of *de minimis* agreements, it makes an exception from the prohibition for all restrictive but non hard-core agreements between parties, whose joint market share does not exceed 10 per cent on the market. If the cumulative effect of such agreements is significantly distorting competition, the GVH may revoke the exception granted by the Act.
- The Act empowers the Government to issue block exemption regulations. Although the GVH has no general authorisation to revoke in individual cases the exemption given by a regulation, but in the case of the above mentioned cumulative effect it may decide that in the future the exemption should be regarded as not valid.
- The GVH upon notification of the parties grant individual exemption if the agreement fulfils four conditions laid down in Article 17. These conditions are similar to those of Article 81(3) of the Treaty of Rome. The GVH may impose conditions and obligations on the parties in its exemption decision.

- The parties can apply for a negative clearance of the GVH as well, in which the GVH establishes that the parties' agreement does not fall under Article 11, is subject of an exception under Article 12 or by a block exemption regulation of the Government. The GVH is not bound by its negative clearance.
- Exempting decisions are made by the GVH within 120 days, while in hard-core cartel cases the deadline for making the ultimate decision is 180 days, which can be extended twice by the same period.

The number of the cartel cases decreased to some extent in 2001 and no fine was imposed in this category of cases.

<b>2001</b>	
Restrictive agreement cases	10
<i>Horizontals</i>	7
<i>Verticals</i>	3
<i>Notification</i>	6
<i>Ex officio</i>	4
Interventions of the GVH	1
Fines, million HUF	-

In 2001 6 out of the 10 cases were commenced upon application, the rest were launched ex officio. There was only one intervention in 2001 – the GVH attached conditions to one of its exempting decisions.

One of the electricity distributors – in the South Transdanubian region, DÉDÁSZ Rt. – concluded an agreement with the associations of the electricians and the industrial chambers active in its supply area to ensure the safety and quality of their work ancillary to the original service provided by DÉDÁSZ. According to the agreement the parties set up a registry&liability system. Everybody who infringes the rules laid down, faces sanctions from the industrial chamber. Since November of 2000, however, the membership in the chambers is not mandatory anymore, hence there would have been a different treatment for independent electricians and member electricians in relation to the available sanctions. Assessing the fulfilment of the four criteria of individual exemption

system, the Competition Council found the agreement was eligible for the exemption, imposed nevertheless a condition whereby the sanctions can take certain forms only.

In the Municipality of Szolnok/Borostyánkert case the Competition Council exempted the agreement of the parties relating to funeral services subject to conditions, namely Borostyánkert may not apply during the subsequent three years price increases higher than the official inflation rate. Szolnok entrusted Borostyánkert with the operation of the only funeral parlour in the cemetery of the town, excluding all the other funeral operators from the market. Although the Competition Council accepted the arguments of the parties that in this way a reasonable organization is ensured, found however, that consumers are allowed a fair share of this benefits only if the operator is prevented from demanding excessively high prices for the use of the parlour.

### 3.2. Abuse of dominant positions

In the field of the control of the *abuse of dominant positions* the Act prohibits these kinds of practices in general and in addition to this, it contains some particular prohibitions, like that on excessive pricing practices, discrimination, tying, etc. [Article 21]. The definition of dominance builds on the ability of the undertakings to act independently to a great extent from other market participants [Article 22]. Costs and risks of market entry and exit, financial strength of the undertakings, the structure of the relevant market and market shares are among the factors to be taken into account at assessing the existence of dominance in a particular case. In abusive practices cases the time limit is 180 days for the investigations, which can be extended twice by the same period.

	<b>2001</b>
Dominant position cases	33
Interventions of the GVH	3
Fines, million HUF	10.0

#### *Cases from the cableTV sector*

Similarly to the previous years, in 2001 there were numerous proceedings instituted against cableTV operators. The GVH, however, considered interventions necessary only in three cases, while really serious violations were found in two out of these three cases. In one of these cases, UPC Hungary Kft's policy concerning the structuring of programme packages was found abusive. The undertaking changed its program packages by placing certain popular programmes into a package, which could be received by the consumers only by the use of a decoder. Moreover, it was also challenged by the Competition Council, that certain points of

the standard contracting conditions granted unilateral possibility for the undertaking to increase its prices in a non-transparent way. In the other case MATÁVkábelTV Kft. was condemned, since following the upgrading of its infrastructure, it changed the programme packages to the detriment of consumers, and its new pricing policy was not supported by a detailed and transparent cost calculation. The Competition Council imposed in both cases a fine of HUF 5 million (cca USD 20.000).

### 3.3. Concentrations

Concentrations must be notified in advance if they reach certain turnover thresholds. Concentrations among non-independent undertakings are not subject to authorisation. Temporary acquisitions by financial institutions do not fall under the scope of M&A control. Dominance test forms the basic assessment criterion: authorisation of the concentration may not be refused if it does not create or strengthen a dominant position, does not impede the formation, development or continuation of effective competition on the relevant market or on a considerable part of it, or if the concomitant advantages outweigh the concomitant disadvantages [Article 30]. The GVH may impose obligations or conditions on the parties or may decide about the divestiture of certain assets. The GVH may apply the same provisions if the parties failed to apply for authorisation and the authority may not have authorised the transaction [Article 31]. The investigation has two stages in concentration cases. In complex cases the decision by the GVH is reached within 120 days while in the simple ones this deadline is only 45 days.

<b>2001</b>	
Merger cases	81
<i>Horizontal</i>	44
<i>Vertical</i>	11
<i>Mixed</i>	26
<i>Notified</i>	76
<i>Ex officio</i>	5
Authorised	74
Not subject to notification	4
Notification withdrawn	1
Conditional authorisation	2
Fines imposed (HUF million)	13,9

The number of concentration cases is increasing continuously; in 2001 these cases represented 44% in the case-related workload of the GVH. 5 cases out of the 81 were commenced by the GVH, in two cases a procedural fine was imposed because of the omission of the notification.

32 concentrations were carried out in the industrial sectors. Many of these cases were initiated by multinational undertakings, which had subsidiaries in Hungary. All these cases were authorised.

12 concentrations were assessed in telecommunications sector. 8 out of these were in connection with public voice telephony, 3 with broadcasting and 1 with security service. In this latter case the Competition Council attached condition to its decision authorising the transaction.

The Competition Council approved the creation of Group 4-Matávör Távfelügyeleti és Biztonsági Szolgáltató Rt under the joint control of Matáv Rt and Group 4 Securitas Biztonsági Szolgálat Kft and the acquisition of control over Monitoring Security Vagyonvédelmi és Szolgáltató Kft by Group 4-Matávör Távfelügyeleti és Biztonsági Szolgáltató Rt. In this case the Competition Council imposed an obligation on Matáv Rt to make extraband transmission accessible to every incumbent in the monitoring market. In this way the chance of performing unfair market practices would be reduced.

There were 13 cases from the agricultural/food processing sector. Particular attention can be given to the Friesland/Numico case. In this case the Competition Council imposed the obligation on the Friesland group not to acquire shares in the Hungarian undertaking MIZO (which has already been controlled by Nutricia – one of the subsidiaries of Friesland), apart from those already owned, during the period of the insolvency procedure of MIZO (since MIZO was under an insolvency procedure).

### **3.4. Consumer fraud**

The Competition Act prohibits the unfair manipulation of consumer choice and as such the deception of consumers and the application of business methods, which restrict, without justification, the freedom of choice of consumers. Although the importance of such cases decreased substantially over years, these cases still form a significant part of the proceedings of the Office, in 2001 it represented one-third of the case-related workload.

	<b>2001</b>
Consumer fraud cases	59
Interventions of the GVH	31

Fines, million HUF	49.7
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#### 4. The experiences of the judicial reviews

The Competition Act makes possible for the parties to appeal against the decisions of the Office to the Metropolitan Court and against its judgements to the Supreme Court. The courts may amend or repeal the decisions of the Office and oblige it to repeat the proceedings.

During the ten years of competition law enforcement 457 actions for review were initiated and 372 of them have been concluded. The court reduced the fines imposed in 41 cases and amended in whole or in part the merit of the decision of the GVH in 31 cases. In further 15 cases the court obliged the Office to repeat the proceedings. As it can be seen a substantial amendment by the court of the decisions is rare.

#### 5. Practice of collecting fines

In the case of establishment of a violation the Competition Council may impose a fine. The December 2000 amendment of the Competition Act provided for that the maximum level of fine can be 10% of the undertaking's net turnover in the preceding business year.

Since fundamental interests are attached to the real effectiveness of collecting the enforceable fines, for failure of voluntary compliance with its decision the GVH requested the Hungarian Tax and Financial Control Administration (HTFCA) to collect the fine on the basis of an agreement entered into in 1997 by the GVH and the HTFCA. Fines qualify as public debts, which can be collected officially like taxes. The co-operation has beneficial impact on the payment of fines.

#### Cases with fines in million HUF in 2001

	Fines imposed		Enforceable		Paid	
	Number of decisions	Total amount of fines	Number of decisions	Total amount of fines	Number of decisions	Total amount of fines
Consumer fraud	18	49,7	15	38,2	8	15,5
Restrictive agreements	-	-	-	-	-	-

Abuse of dominance	2	10,0	1	5,0	1	5,0
Failure to notify a concentration	4	13,9	3	1,9	2	1,8
<b>Altogether:</b>	24	73,6	19	45,1	11	22,3

In 2001 the GVH began to elaborate a guideline to facilitate a deterrent fining policy. The system which is being outlined would be a multilevel method using points and multipliers in the evaluation of the infringement. As the first step, the basic amount will be determined by factors like the gravity of the infringement, the attitude of the parties towards the infringement and other considerations. Then the basic amount of the fine will be modified according to the duration followed by the frequency of the infringement. Further consideration of the evaluation would be the benefit gained through the infringement and the possible application of a leniency reduction. Due to the fact that the GVH is still in the planning phase regarding its leniency policy, this factor will be provisionally ignored till the completion of that policy. The final step would be the application of the upper limit of fines laid down in the Competition Act if necessary. Whenever the calculated fine is above 10 percent of the turnover realised in the preceding year, this level should be decreased to the 10 percent limit.

## 6. Competition advocacy

The competition advocacy of the GVH has two main directions. Giving expert opinions to the legislation under preparation, to draft bills and draft government decrees is one of the most important forms of the GVH's competition advocacy. In addition to this, in certain actions the competition authority undertakes the role of the initiator, in these situations its role does not limit to reactions to those actions by ministries, other authorities.

### 6.1. Active participation in actions concerning competition related issues

The new Act on Communications was enacted in June 2001. This Act covers rules for both telecommunications and postal services. This solution is based on a government decision which aims at defining the legislative concept of this area. Now, with having the new Act, it seems that the incorporation of two sets of rules to a single Act was a wrong decision: the telecoms provisions dominate the Act, while the rules relating to postal services received less attention in the Act. As regards the rules on telecommunications, there are two areas, where the GVH thinks that the regulatory solution is not satisfactory. First, the national broadcast distribution and broadcast diffusion can be provided only under a concession contract, which in practice means that it can be provided based on exclusive rights – although the GVH has

always opposed this solution. According to the GVH's view, it would have been better to use an individual licence system instead of the concession system. The other issue also objected to was that the universal postal service provider could hold its excessive exclusive rights (e.g. postal circulation of money and financial services, domestic postal order services).

In the first few years after the market opening, till the new market players besides the incumbent dominant telecom operators become stronger, an asymmetrical regulation is necessary which in respect of the other market players imposes additional obligations on the telecom operators who enjoyed exclusive rights before. The purpose of the imposition and enforcement of additional obligations is to prevent the dominant market player(s) from putting obstacles in the way of its (their) competitors thereby restricting the accomplishment of the competition on the market and the development of tariffs which are lower than the price in the case of a monopoly and which approach the competitive price. Nevertheless the GVH emphasized, that this asymmetric solution could be temporary only and after a three-year period it should be reviewed.

During the preparation of the Communications Act the GVH always stressed how important was to define properly the tasks and competences of the Communications Authority and the Arbitration Committee, and argued for the independence of these authorities.

## **6.2. Giving opinion concerning draft legislation**

The Competition Act provides that the President of the GVH shall be solicited for his opinion concerning all submissions drafted and draft legislation that have a bearing on the responsibilities of the Office. During the year 2001, slightly less submissions was received by the GVH, than in previous years. This means that around 300 draft legislations were sent to the competition authority asking for this opinion. Approximately 30% of them did not concern the scope of duties of the Office whereas 1/3 of them made the elaboration of a detailed opinion necessary.

In such cases the GVH generally analyses the competitive conditions of the market subjected to the regulation considering whether the objective of the regulation is in accordance with the regulatory tools, whether the latter are not too much restricting competition. For the grant of an exclusive right it should be analysed whether it is justified by the provision of a public service and if so, whether the regulation is suitable to prevent the new monopolist from abusing his dominant position. In connection with the possible establishment of official prices the GVH does not consider the size of them but underlines the importance of the measure to carry out a separation in the accounting, in order to avoid cross-financing which would distort competition, of the costs of the services belonging to the competitive sphere and those which do not belong to it.

In 2001 the elaboration of draft bills aiming at opening for competition the market of electricity continued. In the process of the preparation of the **draft bill on electric energy** the GVH continued to stress its earlier objections, namely, that the problem of double verticalism<sup>1</sup>, the compensation of sunk costs, the auditorial separation are issues, all of which make the development of real competition more difficult. In the codification process the GVH concentrated on two questions, on the strengthening of the sectorial authorities, and on the limitation of the planned acquisitions. The GVH has accepted the existence of a sector-specific regulation on concentration control, which would operate in addition to the general concentration control enforced under the Competition Act. However, in the last phase of the legislation the right was given to the sectoral regulator to run a more general merger control system, which exceeded the frames for the application of a sector-specific regime, and meant the duplication of the system. The GVH believes, that the maintenance of this twofold competence is unnecessary; instead, a real co-operation of the competition authority and the sectoral regulator agency would be desirable.

The codification work has begun also in the case of **gas supply**. In this context the GVH drew the attention of the legislators to competition policy aspects in connection with separations, and also to the necessity of the strict treatment of sunk costs.

In connection with the ongoing regulation of the **trade of pharmaceutical products** the GVH stressed that it would be necessary to think over the price- and subsidisation system of this market. As regards the planned regulation of the retail margins of these products, the GVH noted, that the regulation was not supported by a preliminary break-even analysis.

### **6.3. Other kind of competition advocacy**

The Regional Development Committee of the Parliament requested the GVH to elaborate its professional opinion on a request of the President of the Hungarian Chamber of Architects. With reference to the low level of architects' fees and emphasising the necessity to grant high-level quality in this service, the Chamber planned to introduce a regulation of the minimum level of fees. The GVH argued against this idea, by explaining, that it would be false to think, that minimum fees would block unauthorised design and concealment of tax-payment obligations. According to the GVH's view, through a better enforcement of the Chamber's internal rules all the concerns referred to by the Chamber could be solved, so it would have been unnecessary to introduce a regulation of the minimum fees.

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<sup>1</sup> The whole verticum of the industry – including the power generation as well – is divided into two parts vertically. Depending on the consumers (authorised/non-authorised ones) there are competing and non-competing parts of the market – that is „double verticalism”.

## 7. International co-operation

The GVH participates in the work of the OECD Competition Committee, furthermore in 2001 it joined to the International Competition Network.

In 2001 several thematic professional events were organised in Budapest with the organisational and financial assistance of the USAID for the staff of the GVH and also for officials of competition authorities from the South-East European countries. These workshops were held by colleagues from the DoJ and FTC.

2001 saw a more active co-operation with the Russian authority. A delegation of officials from the Ministry for Antimonopoly Policy and Support for Entrepreneurship of the Russian Federation visited the GVH in May of 2001, and this visit offered the possibility to exchange views and to present the Hungarian competition regime and law enforcement practice. Later in the year the Russian minister also visited the GVH and the questions of the further co-operation were discussed.

Experts from the GVH participated as lecturers on events in Macedonia and in China. The first event was organised to transfer the experience, which the GVH gained in the process of approximating the Hungarian competition law to the EC norms. The other event was about the modernisation of China's infrastructure and the visit was organised by the China Institute for Reform and Development (CIRD) in co-operation with the German Technical Assistance Fund GTZ in the context of China's WTO accession.

## 8. Resources of the competition authority

<b>Resources</b>	<b>2001</b>
<i>Annual budget<sup>2</sup></i>	
million HUF	827,7
million USD	3,0
<i>Number of employees</i>	120
economists	37
lawyers	36
other professionals	16
support staff	31

<sup>2</sup> The GVH paid 15 per cent of its budget as office rental fee.

<b><i>Human resources applied to<sup>3</sup></i></b>	
law enforcement	60
advocacy efforts	16

In February 2002 the GVH moved to a new building where substantially better working conditions are provided. The new contacts of the GVH are as follows:

Address: H-1054 Budapest, Alkotmány u. 5.  
Mailing address: 1245 Budapest 5, PObox 1036, Hungary  
Tel.: (36 1) 472 89 00  
Fax: (36 1) 472 89 05

## 9. Competition culture

The GVH is convinced that one of its most important tasks is to give information to the public about its activity, the development of competition law in Hungary and about theoretical and pragmatic questions of competition policy.

<i>The GVH's role in the development of competition culture</i>		
	Number of GVH officials participating regularly in education	4
	Number of publications of the GVH	3
	Number of interviews given to different means of media	21
	Number of professional publications	10
	Lectures for university students	10
	Lectures for professionals	27
	Number of theses by students in competition matters	9
<i>Articles in newspapers about the GVH in 2001</i>		
	Articles, news in nation-wide newspapers	58
	Articles, news in professional/economic newspapers	62
	Articles about the previous year's annual report	6
	Articles about the amendment of the competition law	8

<sup>3</sup> The separation of responsibilities is rather difficult since some of the staff members active in law enforcement take also part in competition advocacy if e.g. a draft regulation relates to "their" industries. The figures of the chart are rough calculations based on the workload.

The GVH puts great emphasis on communicating its activity to the public. To this end the decisions of the Competition Council are made public in the official gazette of the GVH (“Versenyfelügyeleti Értesítő”), and also on the homepage of the GVH, the address of which is: [www.gvh.hu](http://www.gvh.hu). This homepage was recently renewed and restructured. The new site contains more information, and a substantial part of the Hungarian version can also be found in English.