

Annual activity report of Czech Telecommunication Office pursuant to Article 55 of the DSA

01 January 2024 – 31 December 2024

Digital Services Act



Český **telekomunikační** úřad

Executive summary

In 2024, the Czech Telecommunication Office (CTU) focused on preparing for its role as a Digital Services Coordinator (DSC) under the Digital Services Act (DSA). Although a national law enabling the full exercise of its powers has not yet been adopted, CTU has worked actively to spread awareness of the DSA and develop internal capacity.

Key activities in 2024:

- **Complaints handling:** CTU received 25 complaints of violation of the DSA, of which 8 were forwarded to Ireland. None of the complaints resulted in formal proceedings due to absence of statutory authority.
- **National activities:** CTU organised three expert workshops on DSA obligations, certification and current issues of digital services. It also prepared a **Study of Providers of Intermediary Services**, which identified 2,659 relevant entities on the Czech market and estimated the share of the digital economy in the Czech GDP at 4.93%. It also published a **Guide to the DSA**.
- **International cooperation:** CTU was actively involved in 12 meetings of the European Board for Digital Services and participated in 7 working groups. Bilateral meetings were also held with regulators from Austria and Slovakia.
- **Promoting professional cooperation:** A memorandum of understanding was concluded with Masaryk University in Brno.

Due to the lack of statutory authority, CTU has not received any orders under Articles 9 and 10 of the DSA to remove illegal content or to provide information. Similarly, it was not possible to certify out-of-court dispute settlement bodies, trusted flaggers and vetted researchers, or to carry out inspections or impose sanctions for violation of obligations.

Despite legislative constraints, 2024 was a period of intensive preparation and building of the knowledge base for effective implementation of the DSA in the Czech Republic.

Outlook for 2025: CTU expects the adoption of the national Digital Economy Act, which will enable it to fulfil all its duties as a Digital Services Coordinator. Once the legislation is adopted, certification of entities and enforcement mechanisms can be launched. The establishment of an expert advisory panel composed of representatives of the academic sector, authorities, NGOs and service providers is also planned.

Annual activity report of Czech Telecommunication Office pursuant to Article 55 of the DSA

01 January 2024 – 31 December 2024

Table of contents

1.	<i>Introduction</i>	4
2.	<i>Complaints (Article 53 of the DSA)</i>	6
3.	<i>Orders (Article 9 and 10 of the DSA)</i>	7
4.	<i>Out-of-court dispute settlement bodies (Article 21 of the DSA)</i>	8
5.	<i>Trusted flaggers (Article 22 of the DSA)</i>	8
6.	<i>Vetted researchers (Article 40 of the DSA)</i>	8
7.	<i>Enforcement and (inter)national activities</i>	9
8.	<i>Conclusions</i>	11

1. Introduction

General introduction DSA

The Digital Services Act (“DSA”) provides harmonised rules for a safe, predictable and trusted online environment when interacting with so called ‘intermediary services’, which include e.g. online platforms, hosting services or search engines. Examples of such harmonised rules are (1) additional transparency requirements on how online platforms moderate content, (2) citizens’ access to out-of-court dispute settlements and (3) rules for the status of trusted flaggers and transparency obligations for trusted flaggers. The DSA also aims at preventing illegal content online, protecting minors online as well as preventing the spread of disinformation. Providers of Very Large Online Platforms (“VLOPs”) and Very Large Online Search Engines (“VLOSEs”) face additional scrutiny, such as the obligation to provide transparency on advertisements or the publication of their assessment on systemic risks.

The DSA is enforced by the national Digital Services Coordinators (“DSCs”), other national regulators designated as competent authorities in their Member States and for VLOPs and VLOSEs by the European Commission. CTU is the Digital Services Coordinator for the Czech Republic. Although CTU has been designated by the Government as the Digital Services Coordinator, the full authorisation requires adoption of a national law (the Digital Economy Act). Currently, the Act is still in the legislative process. As a result, CTU does not currently have the competence to fulfil all the duties of the Digital Services Coordinator. Within CTU, a special unit is dedicated to the DSA agenda, which had nine full-time employees at the end of 2024.

The DSA has fully applied since 17 February 2024.

Background information

Article 55 of the DSA requires every DSC to prepare and publish an annual report detailing its activities during the past year. The report must include information on complaints received under Article 53 of the DSA and more specific information such as the number and types of orders to act against illegal content or orders to provide information that were issued by national judicial or administrative authorities in the relevant Member State according to Articles 9 and 10 of the DSA. The report should also include information on the actions taken in response to these orders, as communicated back to the DSCs.

The DSC will also share this report with the European Commission and the European Board for Digital Services.

For Member States that have designated several competent authorities to be responsible for the supervision and enforcement of the DSA, the DSC is required to consolidate the activities of all competent authorities into one comprehensive annual activity report.

In the Czech Republic, the other competent authority for the supervision and enforcement of the DSA will be the Office for Personal Data Protection. As of the date of this report, no Act has been adopted in the Czech Republic that would give the Office for Personal Data Protection competences in the area of the DSA. This report will normally incorporate

all relevant information and data as provided by the other competent authority, ensuring full compliance with the obligations of Article 55 (3) of the DSA.

2. Complaints (Article 53 of the DSA)

Introduction

Article 53 of the DSA establishes the right of recipients of intermediary services, or any mandated organisation or association acting on their behalf, to lodge a complaint against providers of these intermediary services alleging an infringement of the DSA. Complaints should be directed to the DSC in the Member State where the recipient of the service is located or established.

The DSC will assess the complaint and, where appropriate, forward it to the DSC in the Member State where the provider of the intermediary services is established, possibly accompanied by an opinion. If the complaint falls under the responsibility of another competent authority within the same Member State, the DSC will transfer the complaint to the appropriate relevant authority.

Despite its limited powers, CTU acted in accordance with Article 53 of the DSA in 2024.

Complaints in 2024

In 2024, CTU received a total of 25 complaints of the violation of DSA.

Categorisation of the complaints

*>Number of complaints handled by the **DSC itself and/or other competent authorities in the Member State***

Authority	Number of complaints handled
Czech Telecommunication Office	17

In the table shown above, we can find two columns. First column is titled "Authority" and the second is titled "Number of complaints handled". The first row is filled with "Czech Telecommunication Office" in the column "Authority" and number "17" in the column "Number of complaints handled".

*>Categorization of the **total number of transmitted complaints by specific receiving DSC***

DSC in other Member State	Number of complaints transmitted to this DSC
Coimisiún na Meán - Ireland	8

In the table shown above, we can find two columns. First column is titled "DSC in other Member State" and the second is titled "Number of complaints transmitted to this DSC". The first row is filled with "Coimisiún na Meán - Ireland" in the column "DSC

in other Member State” and number “8” in the column “Number of complaints transmitted to this DSC”.

Complaints that led to formal investigations in 2024

In 2024, no complaints have led to the opening of a formal investigation by CTU. In accordance with Czech legislation, CTU must have statutory authority to initiate proceedings ex officio, but the relevant Act has not yet been adopted. A formal investigation is considered to have been opened when formal investigation powers according to national law, stemming from the DSA, have been used by the DSC and/or another competent authority.

3. Orders (Article 9 and 10 of the DSA)

Introduction

Article 9 of the DSA outlines the obligations of providers of intermediary services when they receive an order from national judicial or administrative authorities to act against illegal content. First, when a provider receives such an order, they must inform the issuing authority (or another specified authority) about any effect given to the order, specifying if and when effect was given to the order. The article also sets conditions for the orders issued by national authorities.

The issuing authority, or another specified authority if this is stated in the order, must share the order and any information about its implementation with the DSC in the Member State of the issuing authority. The DSC will then share this information with all other DSCs.

Article 10 of the DSA obliges providers of intermediary services to promptly inform the relevant national judicial or administrative authority, or any other authority specified in the order, upon receiving an order to provide specific information about individual recipients of their services. The article also sets conditions for the orders issued by national authorities. Similarly to Article 9 of the DSA, Article 10 of the DSA also sets conditions for the orders issued by national authorities. The issuing authority, or another specified authority if this is stated in the order, must also share the order and any information about its implementation with the DSC in the Member State of the issuing authority. The DSC will then share this information with all other DSCs.

In 2024, CTU did not receive any orders neither pursuant to Article 9 and nor pursuant to Article 10 of the DSA. The implementing Act, which requires the authorities issuing the orders to send them to CTU, has not yet been adopted.

Effects given to the orders

CTU has no information on the effects of orders issued by competent authorities in 2024.

4. Out-of-court dispute settlement bodies (Article 21 of the DSA)

Introduction

Under the DSA, out-of-court dispute settlement bodies offer an additional opportunity for users to resolve content moderation disputes with online platforms. Online platforms must inform users of this option for resolving disputes and are also required to cooperate with the procedures of certified out-of-court dispute settlement bodies. Upon request, DSCs certify out-of-court dispute settlement bodies established in their Member State if they meet the statutory requirements set out in Article 21 of the DSA. For example, the out-of-court dispute settlement bodies must be independent. In addition, they must have sufficient expertise, for example, in a certain type of illegal content. The out-of-court dispute settlement bodies must handle disputes in at least one official EU language.

Certification of out-of-court dispute settlement bodies in 2024

In 2024, CTU certified 0 of out-of-court dispute settlement bodies in total. Certification was not possible due to the absence of the aforementioned national legislation.

5. Trusted flaggers (Article 22 of the DSA)

Introduction

Under the DSA, trusted flaggers are responsible for detecting potentially illegal content and alert online platforms. They are experts at detecting certain types of illegal content online, such as hate speech or terrorist content, and notifying it to the online platforms. The notices submitted by them must be treated with priority by online platforms as they are expected to be more accurate than notices submitted by an average user. The DSC of the Member State of establishment of the applicant entity awards the trusted flagger status. The DSCs oversee the application process, ensuring the entities meet the criteria laid down in Article 22 of the DSA, such as independence from any online platform or specific expertise. Pursuant to Article 22 (8) of the DSA, the Commission, after consulting the Board, shall, where necessary, issue guidelines to assist providers of online platforms and the DSCs in the application of these criteria. The guidelines are scheduled to be adopted in Q2 2025.

CTU did not award any trusted flagger status.

It was not possible to grant the status of a trusted flagger due to the absence of the aforementioned national legislation.

6. Vetted researchers (Article 40 of the DSA)

Introduction

Vetted researchers are researchers that have the right to access non-public data for their research on systemic risks or measures to mitigate them at the Very Large Online

Platforms and Search Engines. Systemic risks are risks that can inflict serious harm to society or the economy at large, for example the widespread dissemination of illegal content or election interference. In order to gain access to relevant data, the DSC of the Member State of establishment of the specific Very Large Online Platform or Search Engines can grant the status to a researcher when the researcher has demonstrated to meet the conditions laid down in Article 40 of the DSA. Very large online platforms and search engines are required to give researchers access to that data to the researchers that have been granted the status of vetted researcher.

Status granted to vetted researchers in 2024

In 2024, CTU did not grant any entities the status of vetted researcher.

It was not possible to grant the status of a vetted researcher due to the absence of the aforementioned national legislation. and of the implementing regulation.

7. Enforcement and (inter)national activities

Introduction

In 2024, DSCs and other competent authorities engaged in a range of enforcement activities, complemented by various international and national initiatives, both formal and informal, aimed at fostering compliance, enhancing cooperation, and ensuring the effective implementation of the DSA.

Enforcement activities and investigation powers used in 2024

CTU did not conduct any investigative or enforcement activities in 2024. The reason for this was the aforementioned fact that, in the absence of national legislation, CTU was not empowered to carry out such activities in 2024.

National activities in 2024

In addition to the above-mentioned complaints, CTU handled 45 written inquiries in 2024, mostly concerning the interpretation of certain provisions of the DSA and the conditions for certification of an out-of-court dispute settlement body and a trusted flagger. In addition, CTU answered 39 telephone enquiries in relation to the DSA.

In order to spread awareness of the obligations arising from the DSA, CTU organised three workshops on the issues covered by the DSA. In March, CTU organised a workshop on the certification processes under the DSA, i.e. the granting of the status of an out-of-court dispute settlement body, a trusted flagger and a vetted researcher. The role of these entities and CTU in the DSA ecosystem was also presented. The aim was to introduce these processes to prospective certification candidates, mainly from the non-profit and academic sectors.

In April, a workshop focused on new obligations imposed by the DSA on providers of intermediary services was held at the premises of CTU. During the meeting, the different categories of obligations were presented depending on the character of the service and the size of the company, the supervisory role of CTU and the draft Digital Economy Act.

In November, a workshop was held focusing on current topics related to the application of the DSA at the Czech and European level. The workshop was intended for representatives of providers of intermediary services, representatives of the non-profit sector, academia and, last but not least, representatives of the public institutions concerned. Specific practical issues were discussed with representatives of providers of intermediary services. The aim of the workshop was primarily to inform representatives of providers of intermediary services about the obligations arising from the DSA, as well as to present the CTU's position on the issues. The [CTU's guides to the DSA](#) for service providers and users (the guide for users is available only in Czech language) were also publicly introduced at the workshop. They contain comments, recommendations and practical examples to help those concerned to better understand their obligations under the DSA.

Selected representatives of CTU spoke at several expert conferences and participated in a number of meetings with stakeholders, representatives of the public sector, the non-profit sector and others. CTU also commissioned an external [Study of providers of intermediary services under the DSA in the Czech Republic](#) (available only in Czech language). This study found that there were 2,659 relevant service providers established in the Czech Republic under the DSA – 1,976 providing services of mere conduit, three caching, 564 hosting, 182 falls into the category of online platforms, 76 into the category of online marketplaces and 1 into the category of internet search engine. Furthermore, it was found that revenues in the digital economy reached approximately CZK 375.8 billion (EUR 15 billion) in 2023, which corresponds to a share of 4.93% of the Czech GDP.

Furthermore, CTU assisted online platforms with registration in the transparency database maintained by the European Commission. CTU also actively fulfilled its role as a coordinator under the European Commission's Guidelines for providers of Very Large Online Platforms and Very Large Online Search Engines on the mitigation of systemic risks for electoral processes in the context of the June elections to the European Parliament. It also coordinated national comments on the draft guidelines on Article 28 (online protection of minors) and Article 22 (trusted flaggers) of the DSA and on the draft implementing regulation under Article 40 of the DSA (data access). Furthermore, in 2024, CTU concluded a Memorandum of Understanding with Masaryk University in Brno to promote mutual cooperation and information exchange in the digital economy.

International activities

Cross-border cooperation with the European Commission and other regulators was an important part of CTU's activities. Bilateral meetings were also held with representatives of the Digital Services Coordinators of Austria (Die Kommunikationsbehörde Austria) and Slovakia (Rada pre médiálne služby). Selected representatives of CTU participated in a number of international activities in 2024, including participation in EBDS, EDIB, Dedicated network of administrative authorities on live event piracy, etc.

European Board for Digital Services

The European Board for Digital Services (the "Board") aims to contribute to a safe, predictable, and trusted online environment that promotes innovation while safeguarding the protection of fundamental rights. Through the Board, the European Commission and the Digital Services Coordinators work together as a cohesive team, adopting a European approach to the enforcement of the DSA. The Board thus plays a vital role in ensuring

the consistent application of the DSA across the European Union, benefiting all European citizens, society, and the economy.

The Board is the platform for discussing all relevant issues and priorities regarding the application of the DSA. Close, trustful cooperation and coordination, taking into account the specific impact of intermediary services in individual Member States, are essential for effective and coherent enforcement of the DSA throughout the European Union.

For DSCs participating in the Board, it is important to actively contribute to this process. Board members support, advise, and assist the European Commission and the other DSCs in their supervisory tasks. They provide each other with insights and expertise, consult external experts when necessary, and contribute to the analysis of emerging issues related to digital services within the internal market. Therefore, participation in the Board requires an active role in collaboration and working together to ensure DSA compliance, with attention to the specific context of each Member State.

In 2024, the European Board for Digital Services held a total of 12 meetings.¹ These meetings served as a critical platform for discussing the ongoing implementation and enforcement of the Digital Services Act (DSA) across the European Union. The meetings provided an opportunity for Board members to engage in in-depth deliberations on a variety of issues and priorities related to the digital services landscape. Each meeting played a significant role in advancing the collective goals of ensuring a safe, transparent, and innovative digital environment across the EU.

CTU attended all Board meetings. In addition, experts of CTU have participated in Working Groups that have been established under the Board, including:² WG 1 – Horizontal and legal issues, WG 2 – Working together, WG 3 Content moderation and data access, WG 4 Integrity of the information space, WG 5 – Consumers and online marketplaces, WG 6 – Protection of minors, WG 7 – Orders and criminal issues.

8. Conclusions

Despite the absence of national legislation and the inability to enforce obligations under the DSA, CTU was very actively preparing for its role as the Digital Services Coordinator in 2024. The CTU's primary focus was on raising awareness of DSA in the Czech Republic, working with stakeholders and building internal supervisory capacity. The most important activities in 2024 include the organisation of the three workshops for stakeholders, the preparation of the market study and the publication of the guides to the DSA.

CTU expects that a national law will be adopted in 2025, which will fully empower CTU to fulfil all the duties of the Digital Services Coordinator. Subsequently, the certification of the entities will be possible. The plan also includes the establishment of an expert advisory panel composed of representatives of the academic sector, authorities, NGOs and providers.

¹ <https://digital-strategy.ec.europa.eu/en/policies/dsa-board> - European Board for Digital Services

² <https://digital-strategy.ec.europa.eu/en/policies/dsa-board-working-groups>