

**CONFIDENTIAL**

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30 June 2009

Mr Alan Horne  
General Director  
Telecommunications Regulatory Authority  
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**KINGDOM OF BAHRAIN**

Fax No. 1753 2125

Dear Alan

**Consultation of Retail Tariff Reform Package – Compliance Aspects**

Thank you for inviting comments on “Consultation of Retail Tariff Reform Package” (the Consultation). Whilst the regulatory team on behalf of Batelco business, has provided an overall considered response to the consultation, my response is from a compliance perspective only. The response provides a comparative analysis between the existing requirements and those proposed in the Consultation. The key areas of comparative analysis are:

1. Requirements and Burden of Compliance Analysis
2. Removal of Ambiguity Analysis
3. Complexity Analysis
4. Resource Intensive and Administratively Burdensome Analysis
5. Undefined Threshold.

The changes proposed would increase complexity and administratively will be more burdensome to implement and maintain. The ease of implementation and ease of validation (proof) should be the primary objectives of any legislation. I understand much hardwork and deliberation goes into designing a transitional regulation regime. However, in my compliance view, the Consultation does not meet the aims of ease of implementation and validation. My detail comments on complexities and concerns are outlined in the enclosed document.

I can be contacted on 3962 0927 should you wish to discuss any aspect of my response with a view to formulating a solution that is more pragmatic and beneficial to all.

Yours sincerely



**Shashi Rawat**  
**Compliance Officer**