

Kalaam Telecoms Responses to Appropriate approach for the implementation of Local Loop Unbundling (LLU) in the Kingdom of Bahrain

Question 3.1:

Do you agree with TRA's proposition to implement only Full LLU for the time being? Please elaborate.

Kalaam:

Yes we do agree, we are with the enforcement of applying the full LLU instead of the shared one in order to avoid having licensing scheme over the copper cables.

Question 3.2:

Do you agree with TRA's proposition not to implement SLU for the time being?

Kalaam:

Yes we do agree, we recommend having the full LLU as unique option for all OLOs.

Question 3.3:

Do you agree with TRA's proposition that non-active lines for which there is capacity at the main network level and at the distribution level should be unbundled? Please elaborate.

Kalaam:

Yes we do agree, this will enrich the OLOs position to provide leased circuits along with the basic broadband service i.e. ADSL. However, all technical information should be provided by the incumbent to implement such scenario.

Question 4.1:

Do you agree with TRA's proposition that the list of MDFs with their category of size and the location of these MDFs on a map (except the ones for which valid national security reasons prevent their location being made public) with their coverage area should be made available free of charge by Batelco on simple request subject to a confidentiality agreement signed by the OLO as soon as possible after the issuance of the Order? Please elaborate.

Kalaam:

Yes we do agree for sure, such information will allow the OLOs to have their plans based on solid information which will let them know more about the

nature of the areas they want to cover. In addition to that, selection of the exact model will be more convenient which will be based on the right forecast. Also it might help OLOs to go for the right specifications i.e. uplink interface, speed, model etc. finally, knows which speeds that the OLOs can offer in certain area.

Question 4.2:

Do you agree with TRA's proposition to organise LLU field tests? Do you agree with the proposed timing? What is your opinion on the site selection proposition? What is your opinion on the OLOs' selection proposition? Please elaborate.

Do you think that other collocation options than the two currently proposed should be envisaged for the LLU field tests?

If as an OLO you are interested in participating in LLU field tests, please specify to which of your network sites backhaul would have to be provided by Batelco.

Kalaam:

Yes we do agree, however with regards to the timing proposed we do think the notice is too short which might prevent interested OLOs who are not up to date with such technology to enter this market.

We do think that the selection should be based on a number of criteria and avoid having first come first served concept. Basically, TRA should keep guidelines for this process. The selection mechanism should be clear enough and based on the OLOs capabilities to provide the basic service with a clear view of the future plan.

The two collocations options mentioned are the most practical choices. The backhaul type should be the fiber options in to avoid any technical obstacles that might occur from other technologies.

The number of sites available for collocation (dedicated & co-milling) versus the number of spaces that can be provided should be published prior having the final result. The selection will be based on what?

Question 4.3:

Do you agree with TRA's proposition to organise capacity building workshops on the LLU offer (to be included in the RO) prior to LLU implementation? What is your opinion on the proposed agenda and timing of these workshops?

Kalaam:

Yes we do agree. The workshop should cover the best operational practices that used to be done by the incumbent.

Question 5.1:

Do you agree with TRA's proposition to determine full LLU prices on an interim basis? Please elaborate.

Kalaam:

Yes we do agree, as long as the costing is going to be reasonable we do believe that the LLU should be provided to the OLOs based on on-cost figures.

Question 5.2:

Do you agree with TRA's proposition that "price on application" should be avoided in Batelco's LLU RO? Do you also agree with TRA's proposition to avoid possible upfront fees and to transform possible upfront fees into recurring charges?

Kalaam:

Yes we do agree

Question 6.1:

Do you agree with TRA's non-discrimination approach that should guide the definition of operational processes and the drafting of the LLU offer?

Do you agree with TRA's proposition to request from Batelco a description of its relevant internal processes for the purpose of the Approval of the LLU Reference Offer?

Kalaam:

1. Yes we do agree
2. Yes we do agree

Question 6.2:

Do you agree with TRA's approach to the provision of specific information related to LLU within the LLU RO of Batelco? Which items of the list above are relevant in the specific context of LLU implementation in Bahrain and should be included in the LLU RO? What are the objective criteria to be used for assessing whether an item of the list above should be considered commercially sensitive in the specific context of LLU implementation in Bahrain?

Kalaam:

1. Yes we do agree.
2. All points mentioned in the article under 6.3 section points 92.
3. We believe that all information should be available to the OLO. However, some information might not be available for the public due to the fact that it should not.

Question 6.3:

Do you agree with TRA's view that both a cost-oriented LLU backhaul offer from the incumbent and enabling backhaul built by OLOs are necessary? If yes, could you please detail your expectations for the LLU backhaul offer to be provided by Batelco (bandwidth of backhaul, type of protocol, etc.)?

Could you also please detail your expectations in terms of self-providing LLU backhaul (e.g. deployment of fibre into Batelco's Service Node) or purchasing LLU backhaul from another OLO?

Kalaam:

Yes we do agree. The fiber optics is the right option.

Question 6.4:

Do you agree with TRA's proposed rule for space allocation?

Do you agree with TRA's proposed specific process for space allocation for the very first collocation ordering?

Is there any justification for such a coordinated approach to be envisaged after the very first collocation ordering for subsequent orderings? Please elaborate

Kalaam:

1. Yes we do agree with the TRA's proposed rule for space allocation.
2. Yes we do agree with the TRA's proposed specific process for allocation for the first collocation ordering.
3. With regard to subsequent orders Kalaam Telecom do not believe the coordinated approach for first orders to be complicated and therefore would suggest that there is justification to use this process for subsequent orders and that indeed this process should form the basis of any related SLA's.

Question 6.5:

What are your views on how to implement the “Use it or Lose it Rule”? Please explain in detail.

Kalaam:

Such concept should be implemented to avoid reserving the space by an OLO without doing any things. The three month period should be more than enough to keep the space reserved.

Question 6.6:

Do you agree with TRA’s proposition to allow end-users to sign a document authorising an OLO to perform all the necessary actions with the incumbent for having their line unbundled, including fixed number portability when appropriate?

Do you agree with TRA’s proposition that the consequences of terminating the contract with Batelco should not be a barrier to change from Batelco to an OLO?

Kalaam:

1. Yes we do agree
2. Yes we do agree

Question 6.7:

Do you agree with TRA’s suggestion to request Batelco to release the ANFP for the field tests to occur in mid-2009 in Bahrain?

Kalaam:

Yes we do agree

Question 6.8:

Do you agree with TRA’s proposition not to implement bulk migration in LLU implementation?

Kalaam:

Yes we do agree

Question 6.9:

Do you agree with TRA's proposition for the forecasts to be done by OLOs? Do you agree with TRA's proposition that OLOs should not pay any penalty if their orders for LLU services are different from forecasts? Do you agree with TRA's proposition that provisions are required to take into account forecasting tolerances? Please elaborate.

Kalaam:

1. Yes we do agree
2. Yes we do agree
3. Yes we do agree, this will allow both the OLO and the incumbent to provision the right capacity in terms of (DSLAM, MSAN, and MDF) along with the collocation space required. Also the amount of time required from the operation view for the OLO and Batelco.

Question 6.10:

Do you agree with TRA's list of a minimal set of parameters for SLAs that should be associated with LLU?

Kalaam:

Yes we do agree

Question 6.11:

Please specify and justify the value for the following parameters of SLAs: validation time for:

- Full LLU line provisioning
- Information provisioning
- Internal Tie cable provisioning
- External Tie cable provisioning
- Dedicated Collocation space provisioning
- Co-Mingling space provisioning
- Shelter space provisioning
- Backhaul provisioning by incumbent

Delivery time for:

- Full LLU line provisioning
- Information provisioning
- Internal Tie cable provisioning
- External Tie cable provisioning
- Dedicated Collocation space provisioning
- Co-Mingling space provisioning
- Shelter space provisioning
- Backhaul provisioning by incumbent

Problem resolution time for:

- Fault clearance
- Backhaul repair

Access to Service Nodes

Kalaam:

Validation time for:

- | | |
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| • Full LLU line provisioning | 3 weeks |
| • Information provisioning | 2 weeks |
| • Internal Tie cable provisioning | 2 weeks |
| • External Tie cable provisioning | 3 weeks |
| • Dedicated Collocation space provisioning | 2 weeks |
| • Co-Mingling space provisioning | 2 weeks |
| • Shelter space provisioning | 3 weeks |
| • Backhaul provisioning by incumbent | 2 weeks |

Delivery time for:

- Full LLU line provisioning 6 weeks
- Information provisioning 2 weeks
- Internal Tie cable provisioning 4 weeks
- External Tie cable provisioning 6 weeks
- Dedicated Collocation space provisioning 4 weeks
- Co-Mingling space provisioning 2 weeks
- Shelter space provisioning 6 weeks
- Backhaul provisioning by incumbent 4 weeks

Problem resolution time for:

- Fault clearance 24 hours
- Backhaul repair 4 hours

Access to Service Nodes 1 hours (pre authorized)

Question 6.12:

Comments are requested with respect to the proposed establishment of SLAs.

Kalaam Telecom agrees on the TRA's methodology that Batelco shall publish within its RO target SLAs and associated penalties. Furthermore, Batelco shall publish on a monthly basis corresponding KPIs, based on which final SLAs will be defined, taking into account, whenever appropriate, benchmark information. Final SLAs will be set after 6 months.

Question 7.1:

What is the minimal set of KPIs for LLU that should be measured on a monthly basis and published by Batelco on its website? Do you agree with TRA's intention to request Batelco to measure and publish the corresponding minimum set of KPIs for other wholesale and retail products necessary to assess prima facie compliance with non-discrimination?

Kalaam:

1. All point mentioned In 7.2 section under 127 should be available.
2. Yes we do agree.

Question 7.2:

Do you agree with TRA's proposition to publish a LLU scorecard that would include: (a) the number of unbundled lines; (b) the number of unbundled MDFs; and (c) the LLU coverage on the basis of a map once LLU is commercially launched? Do you see other indicators that should be included in this scorecard?

Kalaam:

1. Yes we do agree.
2. No.

Question 7.3:

Do you agree with TRA's proposition to create a Working Group on LLU Operations and Service Schedules that will review the progress of LLU and suggest amendments to the LLU RO? Do you also agree with TRA's opinion that the evolution of and amendments to the ANFP should also be discussed within a Working Group on ANFP?

Kalaam:

1. Yes we do agree.
2. Yes we do agree.

Question 8.1:

Do you agree with TRA's opinion that structural separation should not be considered at the current time but should be envisaged in the future if TRA determines the existence of anti-competitive practices by the incumbent such that LLU deployment is stymied?

Kalaam:

Yes we do agree

Question 9.1:

Do you agree with TRA on the key milestones for the LLU implementation phase?

Kalaam:

Yes we do agree, the steps mentioned are fine but the timing has to be shifted (delayed) little bit. This will give the OLO more time to work the vendors.