



**Batelco**

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**RESPONSE**

**TO**

**THE TELECOMMUNICATIONS REGULATORY AUTHORITY OF  
BAHRAIN (TRA)**

**MARKET AND COMPETITION REVIEW OF THE RETAIL MARKET  
FOR INTERNATIONAL OUTGOING CALLS FROM BAHRAIN  
DRAFT DETERMINATION**

**BY**

**BAHRAIN TELECOMMUNICATIONS COMPANY (BATELCO) B.S.C.**

**ON**

**11 February 2016**

**(Our Ref GCL/76/16)**

## Introduction

- a) This submission is made to the Telecommunications Regulatory Authority by Bahrain Telecommunications Company (B.S.C.) (Batelco), in response to the Draft Determination Paper on the “*Review of the Retail Market for International Outgoing Calls from Bahrain*” issued by the TRA on 15 December 2015 (“the Consultation”).
- b) Batelco welcomes the opportunity to make this submission to the TRA’s consultation as the current regulatory settings for fixed originated international calls are based on market data which is over 8 years old. Regulation needs to be kept up to date and removed to keep pace with market, competitive and technological changes.
- c) Batelco’s interest in this matter is that Batelco is materially affected by the issues raised in the Consultation, on the basis that it is a leading provider of telecommunications services, including international outgoing calls from both fixed and mobile, within the Kingdom of Bahrain.
- d) This submission addresses the substantive issues contained in the Consultation and provides responses to the TRA’s specific questions.
- e) The structure of the submission is as follows:
  - Introduction
  - Responses to the TRA’s specific questions
- f) This submission is made by Bahrain Telecommunications Company B.S.C.
- g) Batelco’s principal contact for this response is:

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## **Batelco's responses to the TRA's Specific Questions**

### **Question 1**

***Do you agree with the Authority's definition of the market for international outgoing calls from Bahrain? If not, please explain why.***

1. Batelco is of the opinion that this market review should ideally have been carried out at least three to four years ago and since this time, considers that it was hindered from competing effectively in the market for international calls due to the delay caused by having to refer to the TRA for approval of each proposed tariff change, in line with the retail tariff notification regulation, an often lengthy and time consuming process.
2. This being said, Batelco now welcomes the long overdue conclusion that there should be only one relevant retail market for international outgoing calls and that this should include both fixed and mobile outgoing international calls.
3. We would strongly support the TRA carrying out a more detailed assessment of the rapid increase in uptake and use of OTT services by consumers in this market, rather than choosing to remain agnostic on the issue at this time. The industry has repeatedly expressed its views on this matter and has sought the TRA's assistance and guidance in addressing the increasing presence of OTT providers and services within the Kingdom.

### **Question 2**

***Do you agree with the Authority's view that no operator holds SMP in the retail market for international outgoing calls from Bahrain? If not, please explain why.***

Batelco does not have any major comments in this regard.

### **Question 3**

***Do you agree with the Authority's overall conclusions and the resulting implications? If not, please explain why.***

Batelco does not have any major comments in this regard.