



هيئة تنظيم الاتصالات
Telecommunications Regulatory Authority

The Code of Practice for the Handling of Consumer Complaints

Consultation Report

1 June 2015
Ref: LAD/0515/072

1. INTRODUCTION

- 1.1. On 19 March 2015, the Telecommunications Regulatory Authority (the "Authority") launched a public consultation¹ (the "Consultation") on the Code of Practice for the Handling of Consumer Complaints by Telecommunications Licensees.
- 1.2. The purpose of the Consultation was to invite comments from interested parties (in particular, from undertakings supplying telecommunications services) on the introduction of a TRA Approved Code of Practice for Complaints Handling (the "Approved Code") which introduces minimum criteria to be included by Licensees in their code of practice for handling consumer complaints (the "Code of Practice").
- 1.3. The Authority received responses from Batelco, Zain, Menatelecom, and Viva (the "Respondents"). The Authority wishes to thank all Respondents for their comments.
- 1.4. This Report (the "Consultation Report") summarizes (i) the minimum set of criteria proposed by the Authority in its Approved Code, (ii) the responses received from each of the Respondents in respect of the Approved Code, and (iii) the Authority's views on the issues that have been raised by the Respondents.
- 1.5. This Consultation Report aims to provide all interested parties with an explanation of the Authority's position on the comments received from the Respondents, and accordingly with an understanding of the reasoning behind the Approved Code being adopted in its final form.
- 1.6. The Authority's views as expressed in this Consultation Report are intended to provide an explanation of the Authority's position on the Respondents' comments. To the extent that any statement contained in this Consultation Report is inconsistent with the principles or provisions established under the Approved Code, the Approved Code shall prevail.

¹ See: Consultative Paper on the Code of Practice for the Handling of Consumer Complaints by Telecommunications Licensees, 19 March 2015/LAD 0315 048 (the "Consultation Document")

2. SUMMARY OF CONSULTATION QUESTIONS, RESPONSES RECEIVED AND THE AUTHORITY'S CONCLUSIONS

1.	Scope of the Code of Practice	
<p>The Authority proposes that the Approved Code would apply to all Licensees irrespective of the size of the organization receiving the complaint, although procedures to support the Approved Code could vary according to the size and nature of the Licensee. The Authority believes that the Code of Practice should set out the minimum requirements included in the Approved Code for handling complaints by Licensees in relation to all telecommunications services supplied by them. Additionally, the Code of Practice would not affect a Licensee's obligations or a Subscriber's rights in respect of any present or future consumer protection regulation and legislation. The Code of Practice would also exclude complaints subject to legal action.</p> <p>The Authority has also defined a 'Complaint' as <i>"an expression of dissatisfaction made by a Subscriber to a Licensee related to the Licensee's provision of telecommunications services to the Subscriber, or to the complaint-handling process itself, where a response or resolution is explicitly or implicitly expected."</i></p>		
1.1	QUESTION 1: Do you agree with the statements above regarding the application of the Code of Practice? If not please support your answer as appropriate.	
	SUMMARY OF COMMENT RECEIVED	AUTHORITY'S RESPONSE
1.1.1	BATELCO	AUTHORITY
	Batelco agrees in principle with the general statements made by the Authority regarding the application of the Code of Practice.	-
1.1.2	MENATELECOM	AUTHORITY
	Mena disagrees with regulatory intervention in a service provider's customer complaint handling process - in the manner of the proposed consultative code of practice. By standardizing the customer complaint procedures, the regulator robs the service provider of its own prerogative to offer better and perhaps more novel and innovative consumer complaint handling procedures (especially when consumer complaint handling is not the specialization of the regulator). If the regulator creates an effectively competing market environment in which all service providers compete on a level playing field, then the effective competition (of its own accord) can foster high consumer complaint	The Authority considers that, irrespective of the competitive conditions of the telecommunications market, Licensees have a license obligation to have in place a code of practice for handling consumer complaints. Not only that, but pursuant to Article 55 of the Law, Licensees must establish procedures for dealing with consumer complaints in relation to the operation of telecommunications networks and services. The Authority also has the power under the Law to direct Licensees to review or modify such procedures. Consumer confidence depends on the notion that the purchase of a product or service from a Licensee will be supported by an adequate level of operator response should that service not meet the expectations of the consumer. While it is the responsibility of Licensees to provide adequate

	quality of service.	customer service, failings have nevertheless been brought to the Authority's attention. The Authority's intention is not to prescribe how Licensees should respond to a complaint, but to ensure that Licensees have effective complaints procedures for resolving complaints in a fair and timely manner. The Authority wishes to re-affirm that what is set out in the Approved Code is a basis for establishing a minimum standard of customer care. Licensees should seek to exceed these standards in order to promote greater customer care when handling complaints. Not only that, but in turn this will also give Licensees an opportunity to gain a competitive advantage by enhancing the quality of service they provide to their customers.
1.1.3	VIVA	AUTHORITY
	VIVA agrees with the statements made regarding the application of the Code of Practice.	-
1.1.4	ZAIN	AUTHORITY
	Zain agrees with the statements regarding the application of the Code of Practice.	-
1.2	QUESTION 2: Do you agree with the proposed definition for a Complaint? If not, please support your answer.	
1.2.1	BATELCO	AUTHORITY
	Batelco considers the proposed definitions for a Complaint to be quite general and open to interpretation, especially where the terms 'expression' and 'implicitly' are applied. Batelco would suggest that the definition be made more specific, with customers being required at least to make a 'statement' that a particular service has been carried out in an 'unsatisfactory' or 'unnecessary' manner.	The Authority agrees with Batelco's comment and suggestion, and has amended the definition for 'Complaint'.
1.2.2	MENATELECOM	AUTHORITY
	Mena believes that the proposed definition for a 'Complaint' is far too wide. 'Expression(s) of dissatisfaction' are actually mostly related to package pricing, or the fact that the customer is 'dissatisfied' that the package does not contain 'free'	The Authority agrees with Mena's comment in that the proposed definition for 'Complaint' is wide, and has amended it in the Approved Code.

	features. We may agree with the Authority's far-reaching definition if the Authority is prepared to handle complaints related to high package pricing which are the direct result of market areas related to wholesale supply that remain un-competitive (such as wholesale duct rental).	
1.2.3	VIVA	AUTHORITY
	VIVA agrees with the proposed definition for a Complaint.	-
1.2.4	ZAIN	AUTHORITY
	Zain agrees with the statements regarding the proposed definition for a Complaint. It is to be noted, however, that Zain logs all complaints received via its Call Center, website, shops and emails. Many of the complaints received by the Call Center are solved by agents offering an immediate solution during the call itself (for example, by walking the customer through certain menu settings). This immediate resolution concept is referred to as First Call Resolution (FCR) within the industry. Zain would like to highlight that although the FCR cases do not fall under the "Complaint" definition (as no further resolution is expected by the customer), Zain does include their statistic in its quarterly QoS report to the Authority, for the sake of providing a more comprehensive view of customer satisfaction.	The Authority's intention in defining a 'Complaint' is to ensure that there is clarity as to the scope of the matters that the Approved Code will apply to. The Authority is aware that Licensees currently use different definitions in their internal procedures, and a complaint is sometimes not recognized until it has been escalated within the company. The Authority's definition of a 'Complaint' aims to capture all expressions of dissatisfaction that are made to Licensees, whether or not the Licensee decides to escalate the matter internally.
SCOPE OF THE CODE OF PRACTICE - AUTHORITY'S CONCLUSION		
<p>Having considered the views of the Respondents, the Authority has decided that the definition of a 'Complaint' in the Approved Code will be:</p> <p><i>"Any oral or written expression of dissatisfaction, whether justified or not, from, or on behalf of, a person about the provision of, or failure to provide, a telecommunications service(s) or to the complaint-handling process itself, and requires action or redress for its resolution."</i></p>		
2	Accessibility to the Code	
<p>The Authority proposes that the Code of Practice should apply to the treatment of written and verbal complaints. The Authority considers that the Code of Practice detailing the complaint-handling process of a Licensee must:</p> <ul style="list-style-type: none"> • Be published to Subscribers and staff members; • Include all information to Subscribers about their rights to complain; and • Supply all the relevant and necessary contact information for lodging a complaint. 		

<p>The Authority proposes that the Code of Practice should receive as wide circulation as possible amongst Licensees' customers at minimal cost. It should be made available upon request, referenced in standard terms and conditions of agreements, as well as on the Licensee's website. For disabled Subscribers, Licensees should have processes in place for those who may require additional assistance. The Authority also considers that Subscribers must be given proper notice of any amendments to the Licensee's Code of Practice.</p>		
2.1	<p>QUESTION 3: Do you agree with the procedural requirements for making the Code of Practice accessible to Subscribers? Please support your answer as appropriate.</p>	
	SUMMARY OF COMMENT RECEIVED	AUTHORITY'S RESPONSE
2.1.1	BATELCO	AUTHORITY
(a)	<p>With reference to point 3 of Section 4 of the Consultation titled 'Approved Code', under 'Accessibility to the Code', Batelco is unclear as to why the Authority is proposing for operators to provide customers with a physical copy of the Code of Practice each and every time they subscribe to a new service.</p>	<p>(a) The Authority wishes to point out that the wording of point 3 of Section 4 'Approved Code' under 'Accessibility to the Code' states that Licensees shall provide new Subscribers with a copy of their Code of Practice upon them signing a contract for any product or service. The Authority wishes to make it clear that if an existing Subscriber subscribes for further services from the same Licensee, a physical copy of the Code of Practice does not have to be provided to that same Subscriber, as it would have already happened when the Subscriber subscribed for an initial service. As the wording suggests, it should only be provided to new Subscribers.</p> <p>(b) There must be clear reference to the existence of a Code of Practice, and not by reference to other sources of information which 'by way of definition also include the Code of Practice'.</p> <p>(c) The Authority agrees with Batelco's understanding.</p>
(b)	<p>In respect to point 4 of Section 4, Batelco already includes a reference in its bills to Batelco's website containing the latest service tariff information and terms and conditions and this would by definition also include the Code of Practice.</p>	
(c)	<p>Batelco wishes to clarify their understanding at point 5 of Section 4 that Licensees will only be required to notify existing Subscribers of any significant changes made to the Code of Practice after these amendments have been finalized and published.</p>	
2.1.2	MENATELECOM	AUTHORITY
	<p>Mena already has an accessible code of practice on the company's website which is available for all the website visitors. We have always believed that it is important to enable subscribers or potential subscribers to reach out directly to us through the available means like call center, online services, support email. Suggestions from</p>	-

	subscribers to the current code of practice are welcomed through the available channels online or suggestion boxes, which are available in all our branches.	
2.1.3	VIVA	AUTHORITY
	VIVA agrees with the procedural requirements for making the Code of Practice accessible to Subscribers.	-
2.1.4	ZAIN	AUTHORITY
	Zain is of the view that Paragraph 9 under section 3 of the consultation document is vague. The “proper notice” is an ambiguous phrase that could be interpreted differently by different Licensees and customers. And some notification means, such as bulk SMS, may cause nuisance to the customers. Zain recommends the posting of a clear notice on the Licensee’s website as the agreed method for public notification of any amendments to the Code.	The Authority considers that the wording of ‘proper notice’ is not ambiguous, but gives Licensees the freedom to use their discretion in deciding what should be done in this particular situation – i.e., giving proper notice of amendments to the Code of Practice.
ACCESSIBILITY TO THE CODE – AUTHORITY’S CONCLUSION		
Having considered the views of the Respondents, the principles to be covered in the code of practice under ‘Accessibility to the Code’ shall not be amended and shall remain as is.		
3	LODGING COMPLAINTS	
<p>The Authority proposes that the process for submission of complaints by complainants be flexible, easy to follow and of minimal cost to the complainant. Procedures of the complaint-handling process and contact points should be set out by Licensees in clear terms in all contracts and information directories. Acknowledgements of written complaints should be set within two (2) working days. All complaints must be acknowledged in the same means by which the complainant originally lodged the complaint in as well as by text message.</p> <p>The following principles would be applied to the Code of Practice:</p> <ul style="list-style-type: none"> • Details of how complaints may be lodged should be detailed in the Code of Practice. This should include by telephone, postal address for complaints made in writing, contact names (if relevant), e-mail address, fax number, and offices or locations where complaints can be lodged in person. • Complaint procedures and contact points should be set out by Licensees in clear terms and conditions in all contracts, bills and directories. • A freephone telephone number or other alternatives for a low cost access such as email, mailing address or Internet webpage form should be made available in an effort to minimize the costs for Subscribers lodging complaints. For the avoidance of doubt, the freephone number shall apply to local off-net calls. 		
3.1	QUESTION 4: Do you agree that these principles should be applied in relation to the submission of complaints? If not, please state why and propose other measures, if any, you think should be implemented for complaint-lodging procedures.	
	SUMMARY OF COMMENT RECEIVED	AUTHORITY’S RESPONSE

3.1.1	BATELCO	AUTHORITY
	Batelco does not consider it reasonable or feasible to request that Licensees acknowledge and respond to all complaints in the same manner by which they are received. Batelco's standard practice is to acknowledge a complaint by way of an SMS to the complainant with a follow up phone call to discuss the issue at hand. However, this process is adaptable to accommodate those with particular disabilities.	The Authority does not agree with Batelco's reasoning and does not find that its (the Authority's) position is unreasonable.
3.1.2	MENATELECOM	AUTHORITY
	Mena does not consider that any other form of document should be included.	-
3.1.3	VIVA	AUTHORITY
	Whilst VIVA agrees with the overall proposed principles which should be applied in relation to the submission of complaints, it disagrees with the following the Authority's proposed aspects:	
(a)	<p>1. The Authority's opinion in the mandate of Para 10 Page 8:</p> <p><i>"all complaints must be acknowledged in the same means by which the complainant originally lodged the complaint in as well as by text message".</i></p> <p>Currently and upon receiving the complaint lodged by the complainant, VIVA notifies the complainant immediately by means of SMS. However, all subsequent related communications are subject to customer's preset choice. Hence, VIVA believes that its approach taking into consideration complainant preference is more appropriate.</p>	<p>(a) The Authority would like to stress on the fact that the Approved Code sets out a minimum set of requirements for the Code of Practice. If a Licensee wishes to go over and beyond the prescribed method of communication subsequent to the initial acknowledgement – i.e. the customer's preferred choice of communication – then the Authority has no objection to that. However, the standard remains that when acknowledging complaints, it must be in the same manner by which the complaint was originally lodged in as well as by SMS.</p>
(b)	<p>2. The Authority's opinions in the mandates of Para 11 Page 9 briefed below for the following reasons:</p>	<p>(b) The Authority would like to point out to VIVA that in the Approved Code under 'Lodging Complaints', fax number is detailed as applicable "where appropriate".</p>

<p>(c)</p>	<ul style="list-style-type: none"> - <i>Details of how complaints may be lodged should be detailed in the Code of Practice. This should include by telephone, postal address for complaints made in writing, contact names (if relevant), e-mail address, <u>fax number</u>, and offices or locations where complaints can be lodged in person.</i> <p>Provisioning the Fax tool as one the channels to lodge complaints is not necessarily required considering that this technology is obsolete and replaced by other advanced technologies.</p> <ul style="list-style-type: none"> - <i>Complaint procedures and contact points should be set out by Licensees in clear terms and conditions in all contracts, <u>bills</u> and directories.</i> <p>Making a reference in every bill to the existence of the Code of Practice is a key concern for VIVA in the view of the length of the text to be inserted. The space on the bills is minimal and there is much information which we wish to include for the benefit of consumers about products and services.</p>	<p>(c) The Authority does not consider making reference to the existence of a Code of Practice in all bills, contracts and other information directories to be onerous. The Authority considers this to be normal practice for any organization setting to provide an adequate level of customer service.</p>
<p>(d)</p>	<ul style="list-style-type: none"> - <i>A freephone telephone number or other alternatives for a low cost access such as e-mail, mailing address or Internet webpage form should be made available in an effort to minimize the costs for Subscribers lodging complaints. For the avoidance of doubt, <u>the freephone number shall apply to local off-net calls.</u></i> <p>Provisioning of a freephone telephone number for both off-net and on-net calls is not commercially viable due to the following reasons:</p>	<p>(d) The Authority rejects VIVA's argument in relation to the freephone number applying to local off-net calls. The Authority does not consider the provision of a freephone number applying to local off-net calls to be an excessive burden.</p>

	<p>a. By mandating a freephone telephone number for off-net calls, VIVA foresees a potential increase of the call volumes to VIVA call center leading to impact the overall quality of service level. Also it will require additional administrative cost to ensure maintaining the good customer experience to VIVA subscribers.</p> <p>b. Customer Call Centre is a very essential service where every call is treated carefully. As such it should be constrained to avoid being unnecessarily overloaded and abused either by VIVA customers or non-VIVA customers.</p> <p>c. While the obligation suggested by the the Authority to offer free off-net calls to our call center, might overload significantly the call center, VIVA's main objective is to ensure that VIVA customers' needs and requests are addressed and guaranteed with adequate service support while adhering to the Quality of Service obligations.</p> <p>Therefore, VIVA suggests that the freephone telephone number to be available for only on-net calls where off-net calls are charged. Additionally, there should be a threshold for the number of free calls that subscribers can make per day.</p>	
3.1.4	ZAIN	AUTHORITY
(a)	There could be cases where the Licensee is unable to send a text message to the customer to acknowledge the receipt of the complaint; for example, if it is a non-mobile service. Thus, Zain proposes the following text in addition to the Paragraph:	(a) The Authority agrees with Zain's suggestion and shall reflect this in the Approved Code.

(b)	<p>“... All complaints must be acknowledged in the same means by which the complainant originally lodged the complaint in, as well as by text message if <u>a valid contact mobile number is provided by the customer.</u></p> <p>Zain will meet the proposed target of (2) working days to acknowledge the receipt of the complaint. However, it should be noted that in some situations delays in the delivery of the acknowledgement to the Subscriber may occur for reasons that are out of the Licensee’s control, such as in the case of the communication being via post. Therefore, Licensees should be accountable for sending, but not for the delivery, of the acknowledgement within the (2) working days period.</p>	(b) The Authority agrees with Zain’s suggestion and shall amend the wording accordingly.
-----	---	--

LODGING COMPLAINTS – AUTHORITY’S CONCLUSION

Having considered the views of the Respondents, the minimum requirements under ‘Lodging Complaints’ shall read:

Lodging Complaints

1. *The Code of Practice shall specify the means by which complaints can be lodged, specifically by:*
 - Telephone how Subscribers can make contact by telephone stating working hours when the service will be attended;*
 - Letter postal address for complaints made in writing;*
 - E-mail address listed for Licensee’s email;*
 - Fax number where appropriate; and*
 - Hours opening hours for retail outlets.*
2. *All complaints must be acknowledged within two (2) working days in the same means by which the complainant originally lodged the Complaint as well as by text message if a valid contact mobile number is provided.*
3. *Where a complaint is submitted by post, acknowledgement shall be deemed to have taken place when the letter is sent to the complainant within the afore-mentioned two (2) day-period.*
4. *All Licensees must provide a free-phone number for the lodging of complaints by telephone. For the avoidance of doubt, this free-phone number shall apply to local off-net calls.*
5. *The means by which a Licensee acknowledges complaints should not unduly deter Subscribers from making a complaint.*

4	Stages to the Complaint-Handling Process
---	--

The Authority proposes a minimum number of stages in the complaint-handling process in the context of a standard complaint. These are:

- Initial contact by complainant
- Acknowledgement of the complaint within two (2) working days
- Investigation of the complaint
- Notification of resolution
- Internal escalation within two (2) working days
- External escalation

Upon initial contact, Licensees shall inform complainants of the stages in respect of the complaint handling process. This includes, at a minimum, the steps the Licensee will take with a view to investigating and resolving the complaint, timeframes for resolving the complaint, and the process and timeframe for external escalation of the complaint to the Authority. Licensees shall include an internal escalation procedure in their Code of Practice, the operation of which shall not exceed a maximum of two (2) working days. Licensees will also ensure that front line staff is fully informed of the complaint-handling stages.

4.1	QUESTION 5: Do you agree with the classification of the stages of the complaint-handling process for complaints? If not, please state reasons and suggestions.	
	SUMMARY OF COMMENT RECEIVED	AUTHORITY'S RESPONSE
4.1.1	BATELCO	AUTHORITY
(a)	Batelco is mostly in agreement with the stages being proposed by the Authority for the complaint-handling process and notes that this is generally in line with its existing practices. Batelco would like to recommend that stage 4 'notification of resolution' ought to be changed to read 'notification of outcome' as there are often instances where no resolution is reached between both parties. Batelco also suggests changing two (2) working days to five (5) working days in relation to escalating complaints internally.	(a) The Authority agrees with Batelco's suggestion in rewording stage 4 'notification of resolution' to 'notification of outcome' to properly reflect any given situation that may arise. However, it does not agree with increasing the minimum two (2) working days timeframe in relation to escalating complaints internally. As the majority of respondents raised no issues in relation to this point, the Authority considers this minimum timeframe appropriate.
(b)	Based on current and past practice, Batelco considers it to be difficult to immediately and correctly identify the type of category of a particular complaint at the time it is logged. Whilst Batelco is agreeable to including non-legally binding timeframes in its Code of Practice, subject to the proposed revisions set out, it does not consider it reasonable at the outset of the process. Subscribers should be referred to the Licensee's website and the respective clauses of the Code of Practice for further information in this regard.	(b) The Authority acknowledges that, given the diverse nature of complaints, the stages of the complaint-handling process should be as flexible as possible. Having said this, the Authority does not consider that these stages are overly prescriptive and Licensees are free to adopt additional stages should they choose to do so for ease of identification.

4.1.2	MENATELECOM	AUTHORITY
(a)	Mena believes it is important that complaints are logged effectively and that they are responded to within a reasonable period of time. We believe that this is a competitive advantage that some service providers can have over others. It is important also to note that the freephone number is subject to the company's internal policy as it is a service and there are costs behind it. Other free means like E-mail and online services are available to the subscribers with no additional cost against the customers.	(a) Please refer to the Authority's response in 4.1.1(b)
(b)	Mena believes that the Authority has not justified why it proposes that Licensees should inform complainants of external complaint escalation timeframes. Mena believes that the Authority should manage the complaints that it receives – and this includes informing complainants of timeframes to resolution, etc.	(b) The Authority would like to clarify that it does not expect Licensees to inform complainants of the entire external escalation process and timeframes. It expects Licensees, however, to make mention of the existence of an external escalation process as part of the stages to the complaint-handling process within the Code of Practice.
4.1.3	VIVA	AUTHORITY
(a)	VIVA agrees with the classification of the stages of the complaint-handling process.	-
4.1.4	ZAIN	AUTHORITY
(a)	Zain agrees with the classification of the stages of the complaint-handling process for complaints. However, Zain would like to highlight that a closure process is required for cases escalated to the Authority, wherein the Authority formally confirms the closure of the case.	The Authority notes Zain's proposal. The Authority typically marks the closure of the case either by (i) seeking to mediate between the licensee and the complainant in the first instance or (ii) issuing a decision where mediation has failed. In addition a closure process will be available in the near future as the Authority is developing its Customer Relationship Management (CRM) system. The Authority does not believe that a change to the Code of Practice is however warranted.
STAGES TO THE COMPLAINT-HANDLING PROCESS – AUTHORITY'S CONCLUSION		
<p>Having considered the views of the Respondents, the stages to the complaint-handling process shall read:</p> <p>1. The following minimum number of prescribed stages in the complaint-handling process must be included in the Code of Practice:</p>		

- a. Initial contact by complainant
 - b. Acknowledgement of the complaint within two (2) working days
 - c. Investigation of the complaint
 - d. Notification of outcome
 - e. Internal escalation within two (2) working days
 - f. External escalation
2. Licensees shall provide reasonable and clear timeframes for each stage in their Code of Practice. Licensees must also specify the procedures they shall follow in each particular stage of the complaint handling process.
 3. Licensees shall inform complainants at initial contact of the process for handling a complaint. This includes, at a minimum, the steps the Licensee will take with a view to investigating and resolving the complaint, timeframes for resolving the complaint, and the process and timeframe for external escalation of the complaint to the Authority.
 4. Licensees shall include an internal escalation procedure in their Code of Practice, the operation of which shall not exceed a maximum of two (2) working days.
 5. Licensees must ensure that front line staff are fully informed of the complaint-handling stages.

5	Categorization of Complaints
---	------------------------------

In order to facilitate prompt processing of complaints, the Authority proposes to categorize complaints into 'mobile service complaints' and 'all other service(s) complaints'. The Authority acknowledges that certain categories of complaints will take longer to resolve than others, but in order to protect Subscribers' interests against unnecessary delays, detailed information on target times for the resolution of each category of complaints should be determined.

The Authority proposes the following categories for complaints:

For mobile services:

- (a) Billing
- (b) Standard subscriber agreements
- (c) Number portability
- (d) Prices and tariffs
- (e) Quality of service
- (f) Fraud or theft (includes lost devices or SIM cards)
- (g) Roaming
- (h) Other

For all other services:

- (a) Billing
- (b) Standard subscriber agreements
- (c) Number portability
- (d) Prices and tariffs
- (e) Quality of service
- (f) Fraud or theft (includes lost devices)
- (g) Installation
- (h) Other

5.1	QUESTION 6: Are there any other categories of complaints that you believe should be
-----	---

	included?	
	SUMMARY OF COMMENT RECEIVED	AUTHORITY'S RESPONSE
5.1.1	BATELCO	AUTHORITY
(a)	Batelco wishes to clarify that it does not consider 'quality of service' complaints to cover technical faults and any that are identified would need to be addressed separately. Batelco does not consider lost devices or SIM cards to be 'fraud or theft' complaints and already has internal procedures in place for these issues wherein the services are immediately stopped once the incident has been reported to Batelco by the relevant customer.	(a) The Authority does not agree with Batelco's standpoint. The Authority finds that technical faults are covered under quality of service. Also, lost devices can potentially lead to fraud or theft. Nevertheless, the point behind such categorization is to immediately disconnect the service and that therefore Batelco's point is an arguable point.
(b)	Batelco would also appreciate additional clarification as to what type of issues the Authority might consider to be included in 'other' complaints.	(b) The 'other' classification allows Licensees to introduce any other categories, which they feel should be included in the categorization of complaints.
5.1.2	MENATELECOM	AUTHORITY
	Mena has no further addition.	-
5.1.3	VIVA	AUTHORITY
	VIVA agrees with proposed categories of complaints.	-
5.1.4	ZAIN	AUTHORITY
	Zain agrees with the proposed categories of complaints.	-
CATEGORIZATION OF COMPLAINTS – AUTHORITY'S CONCLUSION		
Having considered the views of the Respondents, the stages to the complaint-handling process shall not be amended and shall remain as is.		
6	Timely Treatment of Complaints	
<p>The Authority considers that for each category listed, there ought to be an appropriate timeframe within which to resolve the complaint as well as suggested scales. For circumstances where it is not possible for a complaint to be handled within a certain timeframe, the complainant must be kept informed throughout the process and advised of a revised resolution timeframe.</p> <p>The Authority acknowledges that the wording of Article 56 is rather ambiguous and has given rise to questions about its interpretation. The Authority therefore considered it appropriate to address this concern in the Public Consultation and in the Approved Code to provide guidance on how the specific Article should be interpreted.</p>		
6.1	QUESTION 7: Do you find that this interpretation satisfies the requirements of Article 56(a) of	

	the Telecommunications Law?	
6.1.1	BATELCO	AUTHORITY
	Batelco wishes to clarify that Article 56(a) considers not only the interests of Subscribers but also the interests of Licensed Operators and we do not interpret this particular provision of the law to mean that a complaint should be resolved solely to 'the satisfaction of the complainant'.	The Authority notes Batelco's comment and has amended its statement accordingly.
6.1.2	MENATELECOM	AUTHORITY
	Mena disagrees with the proposed interpretation of Article 56(a) of the Law as the interpretation presents conditions that are neither mentioned nor referred to in the Law. We think it is inappropriate that the Authority adds conditions to the Law without following legislative procedure.	<p>The Authority is in receipt of comments from the Legislation and Legal Opinion Commission ("LLOC"). Based on the LLOC's interpretation:</p> <p>"Either party may escalate a complaint to the Authority prior to the expiration of the sixty (60) day period if a Licensee's complaint-handling procedures have been exhausted and no resolution to the dispute has been reached. A party may also escalate a complaint to the Authority after the sixty (60) day period has lapsed if (a) there is no response from the Licensee regarding the dispute, and (b) the Licensee's resolution to the dispute does not satisfy the Complainant."</p> <p>As a result, the interpretation of Article 56(a) of the Law has been amended to include the following principles:</p> <ol style="list-style-type: none"> 1. Either party may escalate a complaint to the Authority prior to the expiration of the sixty (60) day period if the complaint-handling process set out in the Code of Practice concludes with no satisfactory resolution. 2. Either party may also escalate a complaint to the Authority sixty (60) days after it is acknowledged if: <ol style="list-style-type: none"> a. The Licensee fails to respond in a timely manner regarding the dispute; and b. The Licensee's resolution to the dispute does not satisfy the complainant.

6.1.3	VIVA	AUTHORITY
	VIVA agrees with the interpretation of the Article 56(a) of the Telecommunications Law.	
6.1.4	ZAIN	AUTHORITY
	<p>Zain agrees with the Authority that the wording of Article 56 (a) is ambiguous.</p> <p>Zain is of the view that Article 56(a) of the original Arabic Telecommunications Law is better translated to English as follows:</p> <p style="text-align: center;">“Any dispute arising between a Subscriber and a Licensed Operator may be referred by either party to the Authority for ruling, after having exhausted the procedures referred to in Article 55 of this Law without reaching at a resolution within sixty (60) days from the date of raising the complaint to the Licensee.”</p> <p>It is important to notice the significance the commas (,) have for the meaning of the article, both in the original Arabic and in the English translation suggested by Zain above. Also, Zain believes that the English translation given in paragraph 17 of Section 3 of the Consultation would reflect the meaning of the original Arabic more accurately if a comma (,) were to be inserted after the word “party” in this paragraph.</p> <p>It is Zain’s view that an interpretation that satisfies the requirements of Article 56(a) of the Telecommunications Law would be achieved if:</p>	<p>Please refer to the Authority’s response in 6.1.2.</p>

	<ul style="list-style-type: none"> In paragraph 19 in the Consultation, the first sentence is changed to: <i>It is clear that Article 56(a) requires that any complaint that has not been resolved within sixty (60) days from the date of submission of the complaint, to the satisfaction of the complainant, must be referred to the Authority after the elapse of the sixty (60) days.</i> Paragraph 20 in the Consultation is changed to: <i>Additionally, if the Licensee does not resolve the dispute within sixty (60) days from the date of submission of the complaint, to the satisfaction of the Complainant, the complaint may be escalated to the Authority after the elapse of the sixty (60) days.</i> <p>Furthermore, before proceeding with the complaint handling process, it is important for the Authority to verify with the Licensee that a customer complaint has been submitted. This point is raised because Zain notices numerous escalated cases from the Authority wherein the customer has either not submitted a complaint or has submitted a complaint of a different nature to the subject matter.</p>	
6.2	QUESTION 8: Do you agree that the timeframes for the resolution of complaints should be included in the Code of Practice? If so, do you agree with the timeframes specified?	
6.2.1	BATELCO	AUTHORITY
(a)	Based on past experience in this area,	(a) The Authority realizes that it is not always

<p>(b)</p>	<p>Batelco is aware that the manner and timeframes for resolution of complaints often varies and will usually depend on the facts of the complaint in hand.</p> <p>Batelco notes that the Authority may be willing to accommodate subscriber complaints received by them within the sixty-day resolution period allowed for under Article 56 of the Law. However Batelco are concerned that the inclusion of the proposed timeframes in the Code of Practice will have a negative impact on the resolution process and customer experience as a whole.</p> <p>In order to better reflect Batelco’s internal workings, investigation procedures and to provide customers with an overall improved customer experience, Batelco wishes to propose the below alternative timeframes for the resolution of complaints (no differentiation between mobile and other services):</p> <ul style="list-style-type: none"> • Billing: Billing disputes by their nature are often quite complex and Batelco requires at least twenty-two (22) working days to locate application forms, investigate the complaint and advise the complainant of the outcome. Batelco agrees to no disconnection while dispute is ongoing. • Standard subscriber agreements: fifteen (15) working days • Number portability: five (5) working days • Prices and tariffs: fifteen (15) working days • Quality of service (QoS): fifteen (15) working days • Roaming: twenty (20) working days • Fraud or theft (includes lost device or SIM card): As previously mentioned, we do not include lost devices and SIM cards as fraud or theft cases and have separate procedures for this. All other 	<p>possible to resolve all complaints within the specified timescales, as stated in the consultation paper and the Approved code. However, it is incumbent upon Licensees to keep Subscribers informed of the complaints-handling process and advise further timeframes within which they expect to resolve the complaint. The Authority does not consider that the proposed timeframes would negatively impact the process and customer experience as suggested by Batelco. On the contrary, as they are maximum timeframes, it will allow Licensees the flexibility to propose a superior service in response to the demands of the market, therefore reflecting its competitive nature. Hence, the Authority finds that the proposed timeframes are appropriate.</p> <p>(b) The Authority has considered whether the timeframes should be extended beyond what has been proposed, and has made amendments to some timeframes. However, the Authority would like to make it clear that Batelco presents no argument or any sufficient data that justifies extensions on the proposed timeframes. Batelco's response was not based on any recorded figures, projections or estimates of complaints that would be resolved if the timeframes were to be extended. Longer timeframes allow for sufficient time to coordinate with different parts of the business, which may involve their input for a response to a complaint. The Authority shall therefore only make extensions to complaints regarding ‘standard subscriber agreements’ and ‘prices and tariffs’.</p>
------------	---	--

	<p>fraud and theft cases will be addressed within Twenty (20) working days.</p> <ul style="list-style-type: none"> • Other: We would require additional here to be able to ascertain what type of issue is involved. We require at least Fifteen (15) working days. 	
6.2.2	MENATELECOM	AUTHORITY
	<p>Mena seeks clarification on whether the Authority intends to the timeframes to be time-to-response or time-to-resolution. In the case of the latter then we think it is more reasonable that the targets become percentage targets, e.g. the service provider meets the resolution targets 80% of the time. This is in order to manage subscriber expectations and in order to cater for cases in which subscribers cannot be accessed or are out of the country.</p>	<p>The Authority wishes to clarify that the proposed timeframes are time-to-resolve and respond.</p>
6.2.3	VIVA	AUTHORITY
(a)	<p>Prior to proposing common timeframes for the resolution of complaints among licensed operators, VIVA recommends to the Authority to keep in consideration the specific obligations imposed on Licensees by means of granted Individual Licenses to avoid any ambiguity that may arise from the inconsistency between licensed operators' specific obligations and the proposed timeframes.</p>	<p>(a) The Authority notes VIVA's recommendation and has already taken license terms into consideration when consulting on the Approved Code as to avoid inconsistencies.</p>
(b)	<p>As such, VIVA strongly believes that it is more appropriate to have the Code of Practice ensuring the visibility and awareness of Licensees' processes rather than building a prescriptive Code of Practice document.</p>	<p>(b) The Authority does not believe that setting target response times as overly prescriptive. The Authority considers that these target response times to be maximum timescales which Subscribers should encounter. This would also encourage Licensees to set tighter standards over and above those outlined here.</p>
6.2.4	ZAIN	AUTHORITY
	<p>Zain agrees with the resolution timeframes except for the Fraud or Theft category. Meeting the one (1) day target for theft</p>	<p>The Authority has amended this category. Please refer to the Authority's answer to clarify that the time frames for disconnection of</p>

	<p>cases is feasible; where the Licensee is required to temporarily disconnect the service. Actions are taken immediately after receiving the complaint.</p> <p>For fraud, on the other hand, one (1) working day is not feasible for conducting an investigation. More time is required for documentation checks and for liaising with any relevant government entities. Therefore, Zain recommend that the 'Fraud or Theft' category be split into two:</p> <ol style="list-style-type: none"> i. Fraud with Target Response Time of Five (5) working days. ii. Theft with Target Response Time of shortest time possible, not to exceed one (1) working day for scenarios where temporary service disconnection is required. 	<p>service following fraud or theft should be addressed immediately. On the other hand resolution of other complaints falling within this category must be completed in the shortest time possible.</p>
6.3	QUESTION 9: If under Question 8 you answered that additional categories of complaints ought to be specified, please set a timeframe(s) by which that category should be resolved.	
6.3.1	BATELCO	AUTHORITY
	N/A	-
6.3.2	MENATELECOM	AUTHORITY
	N/A	-
6.3.3	VIVA	AUTHORITY
	N/A	-
6.3.4	ZAIN	AUTHORITY
	N/A	-
TIMELY TREATMENT OF COMPLAINTS – AUTHORITY'S CONCLUSION		
<p>Having considered the views of the Respondents, the timely treatment of complaints shall read:</p> <ol style="list-style-type: none"> 1. Licensees shall adhere to the maximum timeframes (the 'Target Response Times') stated throughout this Approved Code when handling complaints. 2. Article 56(a) of the Telecommunications Law provides: <p style="text-align: center;">"Any dispute between a Subscriber and a Licensed Operator may be referred to the Authority by either party after the exhaustion of the procedures referred to in Article 55 of this Law without resolution within sixty days after the date of submitting the complaint to the Licensee."</p> 3. The Authority acknowledges that the wording of Article 56 is rather ambiguous and has given rise to questions about its interpretation. The Authority therefore considers it appropriate to address this concern and provide guidance on how the specific Article should be interpreted. 4. Either party may escalate a complaint to the Authority prior to the expiration of the sixty (60) day period if a Licensee's complaint-handling procedures have been exhausted and no resolution to 		

the dispute has been reached. A party may also escalate a complaint to the Authority after the sixty (60) day period has lapsed if (a) there is no response from the Licensee regarding the dispute, and (b) the Licensee's resolution to the dispute does not satisfy the complainant.

5. When acknowledging receipt of a complaint, Licensees shall state the timescales within which specific categories of complaint will be addressed and normally resolved. The following timescales are the maximum Target Response Times in the stage of notification of resolution:

For mobile services:

Category of Complaint	Target Resolution Time
Billing	Within five (5) working days – with no disconnection while an ongoing dispute is unresolved, provided that complainants have paid the undisputed portion of an account
Standard Subscriber Agreements	Ten (10) working days
Number Portability	Two (2) working days
Prices and Tariffs	Ten (10) working days
Quality of Service (QoS)	Ten (10) working days
Fraud or Theft	Shortest time possible, provided that where the complainant requests disconnection of the service to stop any abuse then that request shall be addressed immediately and must not to exceed one (1) working day
Roaming	Twenty (20) working days
Other	Ten (10) working days

For all other services:

Category of Complaint	Target Resolution Time
Billing	Within five (5) working days – with no disconnection while an ongoing dispute is unresolved, provided that complainants have paid the undisputed portion of an account
Standard Subscriber Agreements	Ten (10) working days
Number Portability	Two (2) working days
Prices and Tariffs	Ten (10) working days
Quality of Service (QoS)	Ten (10) working days
Fraud or Theft	Shortest time possible, provided that where the complainant requests disconnection of the service to stop any abuse then that request shall be addressed immediately and must not to exceed one (1) working day
Installation	Ten (10) working days
Other	Ten (10) working days

6. The timescales set out above are considered maximum timescales. The Authority recognizes that it may not always be possible to resolve all complaints within the stated timeframes. However, in exceptional cases where the above timeframes cannot be met, it is necessary that Licensees keep

complainants informed and advise an extended timeframe within which they can expect to have to complaint resolved.

7. Licensees must ensure the fair and timely resolution of complaints.

7	Disconnection	
<p>It is in the Authority's view that Licensees should not disconnect any complainant while a <i>bona fide</i> dispute regarding a billing issue is unresolved, provided that the complainant has paid the undisputed portion of an account. The Authority considers that each Licensee should have a clearly articulated policy on disconnections in their Code of Practice which follows the following principles:</p> <ul style="list-style-type: none"> i. The bill that is issued to a Subscriber must clearly state the due date for payment; ii. A reminder should be sent out to the Subscriber two (2) days before the due date of payment passes, clearly stating the date by which payment should be made. iii. For voice services, should the account remain in arrears, a follow-up call or letter should be sent to the Subscriber after a further period has lapsed advising the Subscriber that if payment is not received within a stated timeframe they would face disconnection; iv. If the appropriate payment is not made the account would be disconnected; and v. The procedure for reconnection of service following disconnection. 		
7.1	QUESTION 10: Do you agree with the principles set out for establishing a policy on disconnections as part of the Code of Practice?	
	SUMMARY OF COMMENT RECEIVED	AUTHORITY'S RESPONSE
7.1.1	BATELCO	AUTHORITY
	Batelco already has its own disconnection policy in place which generally follows the guidelines set out by the Authority in its Consultation.	-
7.1.2	MENATELECOM	AUTHORITY
	Mena agrees with the principle that services should not be suspended when bona fide billing complaint values are being investigated. However, we find it intrusive that the Authority should prescribe a service provider's disconnection policy. Many disconnection policies are prescribed within individual billing systems and changes are costly and time-consuming. It is the individual operator's prerogative how flexible they wish to be when it comes to service suspensions based on their own desire of a competitive edge and balanced with their internal audited bad debts provisions policies.	The Authority believes that disconnection should be considered as an action of last resort taken by Licensees, typically in response to a bill payment issue. Subscribers place a heavy reliance on telecommunications services, and it is vital that they become aware of the process leading up to disconnection. The aim is for Licensees to promote consumer awareness of their disconnection procedures, and encourage greater consistency within the telecoms industry on these issues. The Authority therefore finds that it would be of great benefit to both Licensees and Subscribers where a statement regarding a disconnection policy to be set out in a Code of Practice which follows a standardized approach in the Approved Code. This policy should reflect any contractual arrangements between Licensees and their Subscribers, and it is in the Authority's view that no Subscriber should be disconnected

		while a <i>bona fide</i> dispute is ongoing.
7.1.3	VIVA	AUTHORITY
	VIVA agrees with the principles set out for establishing a policy on disconnections as part of the Code of Practice. However, steps (2) & (3) are being communicated by VIVA in one SMS where by the SMS content alerts the subscribers on the due date as well as the informative information that they will face disconnection in case of non-payment. As such, VIVA suggests merging the two steps into one.	The Authority agrees with VIVA's suggestion in merging steps (2) and (3) together. The Authority shall include SMS as a communication option along with a follow-up call and formal letter.
7.1.4	ZAIN	AUTHORITY
	Zain agrees with the principles set out for establishing a policy on disconnections as part of the Code of Practice. Nevertheless, Zain would like to highlight that the customer will still be liable for any incurred charges for usage during the reconnection period. For more flexibility in reaching the customer, for example via SMS, Zain would like to add the following to point 3.2.5 iv [addition underlined]: "for voice services, should the account remain in arrears, a follow-up call or <u>other communication</u> should be sent to the Subscriber after a further period has lapsed advising the Subscriber that if payment is not received within a stated timeframe they would face disconnection"	Please refer to the Authority's response in 7.1.3
DISCONNECTION – AUTHORITY'S CONCLUSION		
Having considered the views of the Respondents, the disconnection policy shall read:		
Licensees shall set out in their Code of Practice their policy in relation to disconnection which follows the following principles:		
<ul style="list-style-type: none"> i. the bill that is issued to a Subscriber must clearly state the due date for payment; ii. a reminder should be sent out to the Subscriber two (2) days before the due date of payment passes clearly stating the date by which payment should be made. iii. for voice services, should the account remain in arrears, a follow-up call, SMS or letter should be sent to the Subscriber after a further period has lapsed advising the Subscriber that if payment is not received within a stated timeframe they would face disconnection; 		

iv.	if the appropriate payment is not made the account would be disconnected; and
v.	the procedure for reconnection of service following disconnection.
8	Escalation and Contact Details
<p>The Authority considers that, where appropriate, the complaint-handling process ought to include a procedure for the escalation of complaints internally (which does not exceed two (2) working days) as well as externally to the Authority. Licensees should clearly state the method for escalating complaints internally and externally, especially taking into consideration the sixty (60) timeframe explained above in their Codes of Practice. Licensees must send out written notification to a complainant about their right to escalate their complaint externally to the Authority.</p> <p>Information about how complainants may contact the Authority for the resolution of a conflict with a Licensee should be included in the Code of Practice. The Code of Practice should clearly make Subscribers aware of their right to escalate complaints to the Authority.</p>	
8.1	QUESTION 11: Do you agree with the Authority's view that an internal and external escalation procedure should be set out in the Code of Practice? Please support your answer.
	SUMMARY OF COMMENT RECEIVED
	AUTHORITY'S RESPONSE
8.1.1	BATELCO
	<p>Batelco does not agree that its own internal escalation procedures should be made available for customers and requires additional clarification from the Authority on this point. With regards to the external escalation procedure to the Authority, Batelco notes that this is already being made clear to Batelco's customers by way of inclusion in service terms and conditions, on its website and through front line staff at Batelco retail shops.</p>
8.1.2	MENATELECOM
	<p>Mena disagrees with an intrusive approach in which a regulatory authority seeks to define a service provider's internal procedures. Internal processes are unique to each individual operator and setting these by an external authority stifles efficiency and innovation.</p> <p>Please refer to the Authority's response in 8.1.1.</p> <p>The Authority's intention is not to prescribe how Licensees should respond to complaints, but is to ensure that they have effective, accessible and transparent complaints procedures and resolve complaints in a fair and timely manner. The Authority is concerned with, for example, if Licensees ignored complaints or prolong with giving an appropriate response to a complainant.</p> <p>A reasonable internal escalation process should allow for complaints which cannot be resolved by front-line staff to be referred upwards to</p>

		their line management or to a dedicated complaints-handling team. As a result, it is the Authority's expectation that Licensees will implement processes for escalating complaints where it is evident to front-line staff involved that they will be unable to meet the complainant's expectations, but that someone else in the organization is likely to be able to do so.
8.1.3	VIVA	AUTHORITY
	VIVA agrees with the Authority's view that an internal and external escalation procedure should be set out in the Code of Practice.	-
8.1.4	ZAIN	AUTHORITY
	Zain agrees with the Authority's view that an internal and external escalation procedure should be set out in the Code of Practice.	-
ESCALATION AND CONTACT DETAILS – AUTHORITY'S CONCLUSION		
Having considered the views of the Respondents, the escalation and contact details shall not be amended and shall remain as is.		
9	Traceability and Retaining Records of Complaints	
Licensees should ensure that they have systems in place for recording complaints. They should also ensure that the systems are sufficiently robust to retain necessary information to Subscribers when they enquire about the progress of their complaint. The Authority also considers that Subscribers should be provided with a reference number/unique identifier in order to facilitate timely and efficient responses.		
The Authority considers that all information should be collected and recorded throughout the entire complaint-handling process for a minimum period of one (1) year following the resolution of the complaint.		
9.1	QUESTION 12: Do you agree with the provisions set out above for the retention of records of complaints and the minimum period for recording them?	
	SUMMARY OF COMMENT RECEIVED	AUTHORITY'S RESPONSE
9.1.1	BATELCO	AUTHORITY
	Batelco agrees with the minimum period for retention of records of complaints.	-
9.1.2	MENATELECOM	AUTHORITY
	For the reasons stated above, Mena disagrees with the addition of regulatory obligations that set out internal company processes. Should the Authority face any persistent issues with record retention of a particular licensee, the Authority can certainly take up issues on a case-by-case	The Authority rejects Mena's statements regarding the retention of records. Mena ought to have a proper system in place for such a process, and this embedded requirement within the Approved Code is not onerous nor is in an addition of regulatory obligations.

	basis.	
9.1.3	VIVA	AUTHORITY
	VIVA agrees with the provisions set out for the retention of records of complaints and the minimum period for recording them.	-
9.1.4	ZAIN	AUTHORITY
	Zain agrees with the provisions set out above for the retention of records of complaints and the minimum period for recording them.	-
TRACEABILITY AND RETAINING RECORDS OF COMPLAINTS – AUTHORITY’S CONCLUSION		
Having considered the views of the Respondents, the minimum requirements for Traceability and Retaining Records of Complaints shall not be amended and shall remain as is.		
10	Next Steps	
The Authority sought the views of respondents as to an appropriate timeframe within which Licensees would have to modify their current Codes of Practice. The Authority considers that any modifications deemed necessary following this consultation report should be implemented no later than three (3) months from the date of the publication of the Determination Paper.		
10.1	QUESTION 13: What do you consider would be a reasonable timeframe within which any modifications or amendments to Licensees’ Codes of Practice for Handling Consumer Complaints arising from this consultation should be made?	
	SUMMARY OF COMMENT RECEIVED	AUTHORITY’S RESPONSE
10.1.1	BATELCO	AUTHORITY
	Batelco finds that the three month timeframe proposed by the Authority to be acceptable.	-
10.1.2	MENATELECOM	AUTHORITY
	We believe that, in light of other ongoing consultations and regulatory obligations, six (6) months is the minimum timeframe that should be allowed to licensees to make modifications and/or amendments to their codes of practice.	Having reviewed the responses, the Authority considers that major system changes should not be necessary. Therefore, all modifications should be made to existing Codes of Practice no later than three (3) months from the date of the publication of the Determination Paper.
10.1.3	VIVA	AUTHORITY
	VIVA considers that the three (3) calendar months proposed to amend Licensees’ Codes of Practice for handling consumer complaints arising from this Consultation is sufficient.	-
10.1.4	ZAIN	AUTHORITY
	Zain agrees with the proposed three (3) months’ timeframe, from the date of the Determination Paper.	-
NEXT STEPS – AUTHORITY’S CONCLUSION		
Having considered the views of the Respondents, the next steps shall not be amended and shall remain		

as is.