

**Cross-submission to consultation – Draft Order issued by the Telecommunications Regulatory Authority on the Reference Offer of the Bahrain Telecommunications Company B.S.C, 15 December 2015 (ref: MCD/12/15/092)**

RESPONDENT (CROSS-SUBMISSION STAGE)
Kalaam Telecom Bahrain B.S.C (c)
Veer Passi
Tel: +973 16168648 Email: regulatory@kalaam-telecom.com
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"[Your internal reference #]"

<b>CROSS-SUBMISSION STAGE: "[NAME OF THE RESPONDENT]"</b>	
<b>Q1. Please provide any comments you may have in relation to the Authority's premise of fair, reasonable and non-discriminatory terms, conditions and tariffs for regulated RO products and services.</b>	
<b>Comment (CROSS-SUMBISSION STAGE):</b>	<p>We agree with the points raised by the authority in relation to the premise of fair, reasonable and non- discriminatory terms, conditions and tariff for regulated RO products and services.</p> <p>Based on the CROSS Submission, We agree to Viva's comments on the importance of separation with the new " AssetCo". This is ideal for a healthy competition as Batelco is having complete advantage on the fiber connectivity in Bahrain and operators like us who lease capacity from them, do not have a clarity and competitive advantage in the market.</p>
<b>Q2. Do you agree with the Authority's proposed general amendments to be made to Batelco's RO? Please explain your position. If you disagree, please propose an alternative.</b>	
<b>Comment (CROSS-SUMBISSION STAGE):</b>	<p>Yes we agree to the same. The mentioned amendments and improvements to the RO will be very beneficial to OLO's like us.</p>
<b>Q3. Do you agree with the Authority's proposal to mandate the introduction of Service Levels for the Wholesale Data Connection and the Bit stream products and services? Please explain and justify your position.</b>	
<b>Comment (CROSS-SUMBISSION STAGE):</b>	<p>This is an excellent step by the authority. There are certain products – such as bit stream services, that do not have any SLA due to which customers have opted for other services due to a significant QoS issue.</p>
<b>Q4. Do you agree with the Authority's proposed definition and description of the service request process? Please explain and justify your position.</b>	
<b>Comment (CROSS-SUMBISSION STAGE):</b>	<p>We do agree with the proposed definition and description.</p> <p>But we would like the authority to keep in mind that there have been several cases in the past where we have not had any proper SLA or the orders have been delayed due to which we have paid a hefty credit to the customer.</p> <p>We would appreciate it if some of the cases can be back dated.</p>
<b>Q5. Do you agree with the Authority's proposed definition and description of the service delivery process? Do you agree with the proposed provisions that the Authority considers should apply in case an OLO cancels a Service Request during the delivery process? Please explain and justify your position.</b>	

<b>CROSS-SUBMISSION STAGE: "[NAME OF THE RESPONDENT]"</b>	
	<p>Yes we agree with both the above mentioned points.</p> <p>Although there is no mention on whether the notices of RFT and RFS dates will be done manually or automatically. We suggest that Batelco sets up an automated system to ensure maintain SLA's.</p>
<b>Q6.</b>	<b>Do you agree with the Authority's proposed definition and description of the fault management process? Please explain your position.</b>
<b>Comment (CROSS-SUMBISSION STAGE):</b>	<p>Yes we agree with the proposed definition and description of fault management process.</p>
<b>Q7.</b>	<b>Do you agree with the Authority's proposed process for the payment of Service Level Penalties? Do you agree that the corresponding rebate(s) shall not be claimed by OLOs but directly reflected by Batelco in the next invoice(s)? Please explain and justify your position.</b>
<b>Comment (CROSS-SUMBISSION STAGE):</b>	<p>Yes we agree. But in the case where Batelco does not add the corresponding rebate in the invoice, the OLO has the right to dispute against the same.</p>
<b>Q8.</b>	<b>Do you have any comments on the Service Level definitions proposed by the Authority? Please explain and justify your position.</b>
<b>Comment (CROSS-SUMBISSION STAGE):</b>	<p>No, we do not have any comments for the above mentioned point.</p>
<b>Q9.</b>	<b>Do you agree with the Authority's proposed creation of a Forum on Batelco's RO? Please explain and justify your position. According to you, what should be the terms of reference of such forum to ensure its effectiveness?</b>
<b>Comment (CROSS-SUMBISSION STAGE):</b>	<p>Yes we definitely agree to have a forum to discuss Batelco's Ro. Since the market is so dynamic, this will be helpful for us.</p> <p>Although we also suggest having a one on one session between the OLO, Batelco and the Authority, to discuss some product related issue specifically for Kalaam Telecom.</p>
<b>Q10.</b>	<b>Do you agree with the Authority's proposed approach aiming at limiting the payment of one-off charges for the deployment of a fibre access? Please explain and justify your position.</b>
<b>Comment (CROSS-SUMBISSION STAGE):</b>	<p>Yes we agree.</p> <p>Although for point 4 in Fig 14, we appreciate the authority to provide us clarity on the charges as we feel it's better to have a maximum amount mentioned initially itself. The breakdown for such</p>

<b>CROSS-SUBMISSION STAGE: "[NAME OF THE RESPONDENT]"</b>
charges provided by Batelco would vary from site to site.
<b>Q11. Do you agree with the Authority's proposal to order Batelco to build a centralised database on fibre access and fibre usage in Bahrain? Do you agree that until such time as a database is made available, Batelco should introduce a 2-working-day presale process? Please explain and justify your position.</b>
<b>Comment (CROSS-SUMBISSION STAGE):</b> Yes we agree. This will be a great help for OLO's to provide prompt response and support to our customers
<b>Q12. Do you have any comments in relation to the speeds for which the WDC should be made available?</b>
<b>Comment (CROSS-SUMBISSION STAGE):</b> We suggest the authority to start with E1 speeds as well (2 Mbps) since we do have requirements to connect on E1 capacity. The 2 <sup>nd</sup> slab can start from the DS3 all the way till 10 G speeds.
<b>Q13. Do you have any comments in relation to the proposed technical characteristics for the WLA and WDC Aggregation Links?</b>
<b>Comment (CROSS-SUMBISSION STAGE):</b> No we do not have any comments for the same
<b>Q14. Would you be interested by the introduction of a synchronisation feature for the WLA? Please explain and justify you position.</b>
<b>Comment (CROSS-SUMBISSION STAGE):</b> Yes we will be interested in this.
<b>Q15. Do you agree that Batelco should offer as an option the full end-to-end physical and logical protection of a WLA or WDC Connection for an additional 30% mark-up on top of the applicable MRC? Please explain and justify your position.</b>
<b>Comment (CROSS-SUMBISSION STAGE):</b> No we do not agree for the same. We believe it should be the same price as the WLA or WDC price, if not cheaper. Batelco will cover their cost in the first link itself.
<b>Q16. Do you agree that Batelco should allow the use of a second ingress ports on a CPE provided for a WLA/WDC Connection or a WLA/WDC Aggregation Link? Please explain and justify your position.</b>

<b>CROSS-SUBMISSION STAGE: "[NAME OF THE RESPONDENT]"</b>	
<b>Comment (CROSS-SUMBISSION STAGE):</b>	Yes we agree.
<b>Q17. Do you agree that Batelco should provide a minimum set of information on CPEs used for WLA and WDC Aggregation Links and Connections? Please explain and justify your position.</b>	
<b>Comment (CROSS-SUMBISSION STAGE):</b>	Yes we agree that Batelco should provide us information on the CPE's used.  We also feel that Batelco should keep an Ex stock for their CPE's which supports normal MTU sizing as well as higher MTU and QinQ. We have faced issues where in the customer has cancelled the link as Batelco could not provide us the CPE in the agreed timelines.
<b>Q18. Do you agree that Batelco should continue to be subject to additional QoS reporting obligations for WLA and WDC? Please explain and justify your position.</b>	
<b>Comment (CROSS-SUMBISSION STAGE):</b>	Yes we definitely agree that Batelco should be providing additional QoS reports.
<b>Q19. Do you agree that Batelco should implement a test based on ITU-T Y.1564 test methodology and systematically provide a copy of test results to the OLO? Please explain and justify your position.</b>	
<b>Comment (CROSS-SUMBISSION STAGE):</b>	Yes we agree.
<b>Q20. Do you agree that OLOs should have access to Batelco's BNV system? Should OLO's customers (i.e. end-users) also have access to such system? Please explain and justify your position.</b>	
<b>Comment (CROSS-SUMBISSION STAGE):</b>	We do recommend that OLO's should have access to batelco's BNV system. Although we suggest that at the moment, it will be a hassle for end users to get an access for the same. OLO's can share the related information to the customer as and when required
<b>Q21. Do you agree that penalties should be paid on a per fault basis for failure to meet a maximum restoration time rather than based on percentage of service availability? Explain and justify your position,</b>	

<b>CROSS-SUBMISSION STAGE: "[NAME OF THE RESPONDENT]"</b>
<b>Comment (CROSS-SUMBISSION STAGE):</b> Yes we agree.
<b>Q22. Do you agree with the Authority's proposed introduction of a 'Premium Support' service for an additional 20% premium on top of the applicable MRC? Please explain and justify your position.</b>
<b>Comment (CROSS-SUMBISSION STAGE):</b> We would like to know if this charge is payable one time? Since the Premium support may be required only during the installation period. We do not agree if the charge is for the whole contract duration.
<b>Q23. Do you agree with the Authority's proposed Service Level Terms and Penalties for the WLA and WDC products and services. Please explain and justify your position.</b>
<b>Comment (CROSS-SUMBISSION STAGE):</b> Yes we agree to the proposed Serve Level terms and penalties. Although we suggest the authority to revise the Maximum delivery time when new ducts must first be installed before deploying a new fiber access cable from 60 WD to 45 WD.
<b>Q24. Do you agree with the Authority's proposed modifications of the Bit stream service description? Please explain and justify your position.</b>
<b>Comment (CROSS-SUMBISSION STAGE):</b> Yes we agree. But we would also want the authority to revise the bit stream pricing. As mentioned in most of our communication to the authority earlier, we have been affected the most due to the increase in bit stream pricing that occurred in 2014. As being one of the most prominent bit ream operator, we have lost a major market share since then. We feel that this pricing should be revised based on the arguments we have raised earlier. Also we request the authority to release higher bit stream packages (more than 16 Mbps). As you are aware, the competition is very high due to the aggressive offers by LTE players in the market, where in they are offering speeds up to 72 Mbps. It is difficult for us to compete in such markets. We request the authority to bring speeds up to 300 Mbps ( Similar to the current residential speeds offered by Batelco through GPON)
<b>Q25. Do you agree with the Authority's proposed Service Level Terms and Penalties for the business Bit stream product and services. Please explain and justify your position.</b>
<b>Comment (CROSS-SUMBISSION STAGE):</b> We firmly believe that the RFS date should be quicker as in this market we are competing against LTE providers who can offer services to their customers within 1 day. We agree to the SLA's and penalties for business bit stream. This is a great initiative by the authority.

<b>CROSS-SUBMISSION STAGE: "[NAME OF THE RESPONDENT]"</b>	
<b>Q26. Do you agree with the Authority's proposal to freeze the charges applicable to the business Bit stream and business WDSL? Please explain and justify your position.</b>	
No we do not agree for the same. As being the operator with one of the highest number of Bistream lines, we are affected due to the increase in price. We appreciate if the prices can be reviewed or provide us a slab based discount based on the number of subscribed lines.  Also as mentioned in the earlier point, we need the authority to introduce higher bitstream packages for business customers.	
<b>Q27. Do you agree with the Authority's proposal to freeze the charges applicable to the ISI and CSI link services? Please explain and justify your position.</b>	
<b>Comment (CROSS-SUMBISSION STAGE):</b>  Yes we agree to the charges. Although we feel that the CSI and ISI link should not be charged by Batelco or any other operator to the OLO's as these operators are aggregating traffic back to Batelco using these Links. These charges are already covered in the per minute rates that are being charged by Batelco as per the RO.  We also recommend that Batelco provides IP connectivity as an option for calls. This is what is followed in most of the other countries. This way, OLO's has an option on the way a call should be routed.	
<b>Q28. Do you have any comments in relation to the Authority's review of the other wholesale services (emergency call access, DQ assistance, inter-operator transit, and CPS services)? Please explain and justify your position.</b>	
<b>Comment (CROSS-SUMBISSION STAGE):</b>  Yes we agree for the same	
<b>Q29. Do you have any comments in relation to the Authority's decision to review the duct access product as part of a separate proceeding? Please explain and justify your position.</b>	
<b>Comment (CROSS-SUMBISSION STAGE):</b>  We will need more clarity on when will the decision be taken to review the duct access product.	
<b>Q30. Do you have any other additional comments with regard Batelco's RO? Please explain and justify your position.</b>	
<b>Comment (CROSS-SUMBISSION STAGE):</b>  No we do not have any additional comments. All related comments have been explained in the above questions.	