

Reference Offer of Batelco		
Kalaam Telecom Bahrain	Veer Passi CEO	regulatory@kalaam-telecom.com +973 16168648
Q1	Please provide any comments you may have in relation to the Authority's premise of fair, reasonable and non- discriminatory terms, conditions and tariff for regulated RO products and services.	
Comment	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.	
Substantiation	NA	
Attachment	NA	
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.	
Comment	Yes we agree to the same. The mentioned amendments and improvements to the RO will be very beneficial to OLO's like us.	
Substantiation	NA	
Attachment	NA	
Q3	Do you agree with the Authority's proposal to mandate the introduction of Service Levels for the Wholesale Data Connection and the Bitstream products and services? Please explain and justify your position.	
Comment	This is an excellent step by the authority. There are certain products – such as bitstream services, that do not have any SLA due to which customers have opted for other services due to a significant QoS issue.	
Substantiation	NA	
Attachment	NA	

Q4	Do you agree with the Authority's proposed definition and description of the service request process? Please explain and justify your position
Comment	We do agree with the proposed definition and description. But we would like the authority to keep in mind that there has 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. We would appreciate it if some of the cases can be back dated.
Substantiation	NA
Attachment	NA
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.
Comment	Yes we agree with both the above mentioned points. 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.
Substantiation	NA
Attachment	NA
Q6	Do you agree with the Authority's proposed definition and description of the fault management process? Please explain your position.
Comment	Yes we agree with the proposed definition and description of fault management process.
Substantiation	NA
Attachment	NA

Q7	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.
Comment	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.
Substantiation	NA
Attachment	NA
Q8	Do you have any comments on the Service Level definitions proposed by the Authority? Please explain and justify your position.
Comment	No,we do not have any comments for the above mentioned point.
Substantiation	NA
Attachment	NA
Q9	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?
Comment	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. Although we also suggest to have a one on one session between the OLO, batelco and the Authority, to discuss some product related issue specifically for kalaam Telecom.
Substantiation	NA
Attachment	NA

Q10	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
Comment	Yes we agree. 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 charges provided by batelco would vary from site to site.
Substantiation	NA
Attachment	NA
Q11	Do you agree with the Authority's proposal to order Batelco to build a centralized 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 working day presale process? Please explain and justify your position
Comment	Yes we agree. This will be a great help for OLO's to provide prompt response and support to our customers.
Substantiation	NA
Attachment	NA
Q12	Do you have any comments in relation to the speeds for which the WDC should be made available?
Comment	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 nd slab can start from the DS3 all the way till 10 G speeds.
Substantiation	NA
Attachment	NA

Q13	Do you have any comments in relation to the proposed technical characteristics for the WLA and WDC Aggregation Links?
Comment	No we do not have any comments for the same
Substantiation	NA
Attachment	NA
Q14	Would you be interested by the introduction of a synchronization feature for the WLA? Please explain and justify you position.
Comment	Yes we will be interested in this.
Substantiation	NA
Attachment	NA
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
Comment	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 it self.
Substantiation	NA
Attachment	NA
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.
Comment	Yes we agree.

Substantiation	NA
Attachment	NA
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.
Comment	Yes we agree that batelco should provide us information on the CPE's used.
Substantiation	NA
Attachment	NA
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
Comment	Yes we definitely agree that batelco should be providing additional QoS reports.
Substantiation	NA
Attachment	NA
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
Comment	Yes we agree.
Substantiation	NA
Attachment	NA

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.
Comment	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.
Substantiation	NA
Attachment	NA
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
Comment	Yes we agree.
Substantiation	NA
Attachment	NA
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
Comment	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.
Substantiation	NA
Attachment	NA

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
Comment	<p>Yes we agree to the proposed Serve Level terms and penalaties.</p> <p>Although we sugges the authority to revise the Maximum delivery time when new ducts must first be installed before deploying a new fibre access cable from 60 WD to 45 WD.</p>
Substantiation	NA
Attachment	NA
Q24	Do you agree with the Authority's proposed modifications of the Bitstream service description? Please explain and justify your position
Comment	<p>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 bitstream pricing that occurred in 2014. As being one of the most prominent bitream 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.</p> <p>Also we request the authority to release higher bitstream 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 upto 72 Mbps. It is difficult for us to compete in such markets. We request the authority to bring speeds upto 300 Mbps (Similar to the current residential speeds offered by batelco through GPON)</p>
Substantiation	NA
Attachment	NA

Q25	Do you agree with the Authority's proposed Service Level Terms and Penalties for the business Bitstream product and services. Please explain and justify your position.
Comment	<p>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.</p> <p>We agree to the SLA's and penalties for business bitstream. This is a great initiative by the authority.</p>
Substantiation	NA
Attachment	NA
Q26	Do you agree with the Authority's proposal to freeze the charges applicable to the business Bitstream and business WDSL? Please explain and justify your position
Comment	<p>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.</p> <p>Also as mentioned in the earlier point, we need the authority to introduce higher bitstream packages for business customers.</p>
Substantiation	NA
Attachment	NA
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
Comment	Yes We agree
Substantiation	NA
Attachment	NA

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
Comment	Ye we agree for the same
Substantiation	NA
Attachment	NA
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.
Comment	We will need more clarity on when will the decision be taken to review the duct access product.
Substantiation	NA
Attachment	NA
Q30	Do you have any other additional Comments with regard Batelco's RO? Please explain and justify your position
Comment	No we do not have any additional comments. All related comments have been explained in the above questions.
Substantiation	NA
Attachment	NA