

Market and Competition Review of the Retail Market for International Outgoing Calls from Bahrain		
Kalaam Telecom Bahrain	Veer Passi CEO	regulatory@kalaam-telecom.com +973 16168648
Q1	Do you agree with the Authority's definition of the market for international outgoing calls from Bahrain? If not, please explain why.	
Comment	<p>Yes, we agree with the definition of the market for international outgoing calls form Bahrain.</p> <p>But we feel the authority needs to further assess the OTT apps in detail as in the current market there are numerous VoIP based mobile applications which are illegally sold in Bahrain.</p>	
Substantiation	NA	
Attachment	NA	
Q2	Do you agree with the Authority's view that that no operator holds SMP in the retail market for international outgoing calls from Bahrain? If not, please explain why.	
Comment	<p>No we do not agree.</p> <p>Based on the statistics explained in point 32 and 33 of the draft determination, the authority has claimed that Mobile operators are having 94% of the market share. We agree that this is a combined business of the three telecom operators, but non mobile operators like Kalaam Telecom have lost our business significantly since there has been no control on retail offers provided in the market.</p> <p>Operators like Kalaam have invested heavily to ensure quality and support on such PPCC services. In the current market scenario, it is difficult to sustain business as operators are offering international calling services below the cost rate with the help of subsidising it with other services.</p> <p>Various operators in Bahrain have stopped their operation due to the fact that they fall in that 6% market share.</p> <p>On the CPS service, The authority has clearly mentioned that Batelco holds SMP for Zone 1 and 3 locations.</p> <p>In summary, we feel that although no single operator hold SMP in the retail market, the Mobile operators are holding the majority share. Smaller operators are not getting any benefit from the same.</p>	

Substantiation	NA
Attachment	NA
Q3	Do you agree with the Authority's overall conclusions and the resulting implications? If not, please explain why.
Comment	<p>No we do not agree that no licensee has a position of SMP in the retail market. Batelco is having the major market share in the enterprise segment covering Zone 1 and 3 destinations. Also to point out that batelco offers VoIP services to their enterprise customers which makes it difficult to compete with them as they are the main ISDN service provider.</p> <p>Also on the Consumer market, all the 3 mobile operators have a significant market share in comparison to the OLO's</p> <p>It would not be right to claim that no licensee has a position of SMP</p> <p>Also to highlight that the current market revenue is being leaked to various OTT apps that are not licensed in Bahrain. This is affecting the traffic and revenue for all the licensed operators in Bahrain.</p>
Substantiation	NA
Attachment	NA