

Response 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
Mena Telecom WLL
Eman Ahmed, Chief Administrative Officer
Eman.Ahmed@Menatelecom.com Tel: 77077166 Fax: 77077066 P.O. Box 3173 Manama Kingdom of Bahrain
Non-confidential
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Exec/88/16

SUBMISSION STAGE: MENA TELECOM WLL	
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.	Mena agrees with the Authority's premise of fair, reasonable and non-discriminatory terms, conditions and tariffs for regulated O products and services. We believe it's also crucial that the Authority uses the market as a whole and grant access to the premise to wholesale services. Leaving certain market areas out of the review, restricts the market.
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.	Mena agrees, this will further qualify with current structure
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.	Mena agrees with the introduction of Service Levels but does not understand why TRA has limited the services to only Wholesale Data Connection.
Q4. Do you agree with the Authority's proposed definition and description of the service request process? Please explain and justify your position.	Mena has no comment
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.	Mena agrees and thinks it is helpful in clarifying the proposal.
Q6. Do you agree with the Authority's proposed definition and description of the fault management process? Please explain your position.	Mena agrees
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.	Mena agrees as long as there is a clear process for disputed rebates.
Q8. Do you have any comments on the Service Level definitions proposed by the Authority? Please explain and justify your position.	

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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?	Mena has no comment
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.	Mena agrees and believes that this is a good step
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.	Mena agrees
Q12. Do you have any comments in relation to the speeds for which the WDC should be made available?	Mena strongly agrees
Q13. Do you have any comments in relation to the proposed technical characteristics for the WLA and WDC Aggregation Links?	Mena believes that the current prices of the WDC make it a non-viable option and suggests introducing volume discounts.
Q14. Would you be interested by the introduction of a synchronisation feature for the WLA? Please explain and justify you position.	Mena has no comment.
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.	Mena has no comment.
	Mena believes that the current MRC is not viable.

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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.	
Mena has no comment.	
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.	
Mena has no comment.	
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.	
Mena strongly agrees.	
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.	
Mena agrees.	
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.	
Mena agrees.	
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,	
Mena agrees and believes this gives a more realistic picture of the damage.	
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.	
Mena already believes that the MRC is too high.	
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.	

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	Mena agrees and also thinks that Service Level Terms and Penalties should also be introduced to other wholesale services.
Q24.	Do you agree with the Authority's proposed modifications of the Bitstream service description? Please explain and justify your position.
	While Mena agrees with the modifications and thinks it makes the service more viable but we don't understand why TRA has not conducted further reviews on other services as not all OLO use Bitstream to access business services.
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.
	While Mena agrees and thinks it makes the service more viable but we don't understand why TRA has not conducted further reviews on other services as not all OLO use Bitstream to access business services.
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.
	Mena has no comment.
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.
	Mena has no comment.
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.
	Mena is surprised that some services are increasing in costs at this stage.
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.
	Mena thinks this is the most important aspect of the review and seeks the Authority's urgent review on the matter.
Q30.	Do you have any other additional comments with regard Batelco's RO? Please explain and justify your position.

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While Mena welcomes the Authority's efforts, the beneficial impact on Mena is minimal and we eagerly look forward to the Authority's further review of the rest of the wholesale services including duct rental, access to fibre and fibre to the home products for both residential and business services. Furthermore, Mena would like to communicate the following points to the Authority:

- Batelco wholesale relates Fibre to the home (FTH) with WDSL service. It is not included in the draft order nor Batelco GPON network that Batelco uses to deliver higher speeds to customers.
- The Authority has not addressed the residential broadband packages where currently the retail prices are lower than the wholesale prices.
- Limiting the last mile fibre access cost where currently the high costs are impairing Mena in the market.