

20 December 2018



Telecommunications Regulatory Authority of Bahrain

Consultation Paper

A public consultation document issued by the Telecommunications Regulatory Authority of the Kingdom of Bahrain (the “**Authority**”) on the draft Reference Offer of the Separated Entity (the “**RO**”).

20 December 2018

LAD/1218/347

The address for responses to this document is:

The Acting General Director
Telecommunications Regulatory Authority
PO Box 10353
Manama
Kingdom of Bahrain

Alternatively, e-mail responses may be sent to lad@tra.org.bh.

The deadline for responses is 16.00 on 24 January 2019.

Purpose: to seek stakeholders' views on the draft RO.

1 INSTRUCTIONS FOR SUBMITTING A RESPONSE

- 1.1 The Authority invites comments on this consultation document from all interested parties. Comments should be submitted no later than 16.00 on 24 January 2019.
- 1.2 Responses should be sent to the Authority preferably by email (either Word or PDF format) or by fax or post to the attention of:

The Acting General Director
lad@tra.org.bh
Telecommunications Regulatory Authority
PO Box 10353
Manama
Kingdom of Bahrain
Fax number: 17532125

1.3 Responses should include:

- the name of the responding entity;
- the name of the principal contact person;
- full contact details (physical address, telephone number, fax number and email address);
- in the case of responses from individual consumers, name and contact details; and
- a brief statement explaining the interest of the responding entity.

1.4 The Authority seeks comments from stakeholders in the telecommunications industry, the business community and the general public on the draft RO (Annex 1).

1.5 All comments should be supported as much as possible by detailed explanation, including, where relevant, references to the specific provisions of the Telecommunications Law¹ (the "Law") or Licences that the respondent is relying upon.

1.6 Further, the Authority invites respondents to provide comments in response to each of the questions listed for reference at Annex 2.

1.7 In the interests of transparency, the Authority intends to make all submissions received available to the public, subject to the confidentiality of the information received. The Authority will evaluate a request for confidentiality in line with the relevant legal provisions² and the Authority's

¹ The Telecommunications Law of the Kingdom of Bahrain, promulgated by Legislative Decree No. 48 of 2002.

² Including Article 23 of the Law.

published guidance on the treatment of confidential and non-confidential information³.

- 1.8 Respondents are required to mark clearly any information included in their submission that is considered confidential. Where such confidential information is included, respondents are required to provide both a confidential and a non-confidential version of their submission (in soft copies and not scanned copies). If part or all of the submission is marked confidential, reasons should be provided. The Authority may publish or refrain from publishing any document or submission at its sole discretion.
- 1.9 Respondents are notified that the Authority intends to hold a workshop in the week commencing 6 January 2019. The purpose of the workshop will be to discuss the draft RO and the draft SE Licence which is the subject of a separate consultation⁴.

2 STATUS OF THIS CONSULTATION DOCUMENT

- 2.1 This consultation document is issued pursuant to the Position Paper on "*How TRA Consults*" issued by the Authority on 17 October 2017.⁵
- 2.2 Interested parties should not take any actions in reliance on the information or proposals contained in this document. Any views set out in this document should be considered as indicative and will be subject to further consideration following the receipt of comments from interested parties.
- 2.3 This consultation document does not represent a decision of the Authority. The issues discussed in this document remain open to consideration and should not be construed as indicating that the Authority has formed any final opinion or decision.
- 2.4 Once the Authority has received and considered responses to this consultation document, the Authority will proceed with finalising the relevant documents subject to this consultation. If appropriate, the Authority will prepare and publish a consultation report which summarises and responds to the comments received.

³ http://www.tra.org.bh/media/document/Confidentiality_Guidelines_Final.pdf

⁴ LAD/1218/344, dated 13 December 2018.

⁵ <http://www.tra.org.bh/media/document/Position%20Paper%20on%20how%20TRA%20consults1.pdf>

3 BACKGROUND TO THE ISSUANCE OF THE RO

- 3.1 The Government's Fourth National Telecommunications Plan ("NTP4") calls for the development of a single national broadband infrastructure network (the "NBN"), encompassing the infrastructure required to enable fixed telecommunications networks in Bahrain.
- 3.2 This NBN should be capable of delivering ultrafast broadband products to consumers and businesses across the Kingdom in line with NTP4. The NBN will be operated and deployed by the Separated Entity.
- 3.3 The Separated Entity will be formed by the separation of the incumbent telecommunications operator, Batelco, into two distinct legal entities: the Separated Entity and the rest of Batelco. The Separated Entity will comprise the appropriate components of Batelco's current wholesale and infrastructure business units, with the other entity comprising the remaining parts of Batelco's business, including its retail division (referred to as Batelco Retail).
- 3.4 Article 3(e) of the Law requires the Authority to "*act in a manner that is consistent with the objectives of*" NTP4 provided that this does not derogate from the Authority's independence as provided for under the Law.
- 3.5 Article 40(bis)(a) states that the Authority "*... shall make the Fixed Telecommunications Infrastructure Network Licence available. Unless the Authority determines otherwise, non-holders of this licence shall not deploy or maintain a fixed telecommunications infrastructure in the Kingdom, including in relation to the deployment and ownership of ducts and fibre optics.*"
- 3.6 The Authority has previously consulted upon the process for the separation of Batelco⁶ in its consultations on the Monitoring Guidelines, the Separation Guidelines and the Special Temporary Measure ("**the Prior Consultation**").

4 PURPOSE OF THIS CONSULTATION PAPER

- 4.1 This consultation paper is concerned with the draft RO submitted to the Authority by the Separated Entity on 13 December 2018.

⁶ <http://www.tra.org.bh/media/document/Consultation%20paper%20-vFinal%20for%20publication.pdf>

- 4.2 The Authority invites stakeholders to comment on the suitability of all aspects of the draft RO, including the comprehensiveness of the product set to meet the reasonable requirements of Licensed Operators as well as the price and non-price terms and the service descriptions.
- 4.3 For completeness, the Authority has included in Annex 2 consultation questions inviting comments on the draft RO.
- 4.4 Following this consultation, in due course the Authority intends to conduct a further consultation on a draft Reference Offer Order. The draft Reference Offer Order will set out the proposed terms that the Separated Entity will be required to reflect in the final version of its RO.
- 4.5 Once the Authority has received comments on the draft Reference Order, it will proceed to finalise and issue the Order. The Separated Entity will then be required to issue the final version of the RO and publish in accordance with the requirements of the Order.

5 OVERVIEW OF THE SEPARATED ENTITY RO

- 5.1 The Separated Entity's RO is a key regulatory instrument that will contribute to achieving the objectives of NTP4. It sets out the terms and conditions (both price and non-price) on which the Separated Entity will make available its products and services, such that licensed downstream providers (including both Batelco Retail and OLOs⁷) can offer services to end users in the Kingdom. Indeed, given the Separated Entity's integral role in the Kingdom's telecommunications sector, it is vital that such terms and conditions are fit-for-purpose. The RO is subject to the Authority's approval.
- 5.2 In summary, the Separated Entity proposes to include the following services in its Reference Offer:
 - Bitstream service
 - Bistream plus service
 - LLCO service
 - WSDSL service
 - WLA service

⁷ In this document, the term "OLO" refers to licensed operators that are not part of the Batelco group of companies.

- WDC service
- DS service
- WBS service
- MBS service

5.3 The Authority recognizes that some of these services are legacy services, but notes that the provision of these services will likely be important to facilitate the transition to the new industry structure, and continuity of service in the migration from copper to fibre based products and services. It is also noted that some of the above services may be substitutes. The Authority is seeking comments on all services with a view to refining the SE product set to meet the reasonable requirements of Licensed Operators.

6 OVERVIEW OF THE PRINCIPLES RELEVANT TO THE RO

6.1 A number of principles set out in NTP4 and the Report on the New Telecommunications Economic Regulatory Framework for the Kingdom of Bahrain (the "NERF")⁸ are relevant to the RO. These include:

- 6.1.1 To support the delivery of the NBN;
- 6.1.2 To promote efficiency in the supply of telecommunications products and services in the telecommunications market of Bahrain;
- 6.1.3 To promote service-based competition in the telecommunications market that is fair, effective and sustainable; and
- 6.1.4 To promote efficient investment and hence support the development of a sustainable, future proof network.⁹

6.2 The Authority is aware that the changes to the sector required by NTP4 are substantial. While the Authority has been working on these changes with stakeholders since the publication of NTP4 and has made significant progress, it would be unreasonable to assume that such changes can be

⁸ Ref: MCD/02/18/005.

⁹ Figure 5 of the Authority's report on the New Economic Regulatory Framework (NERF), Ref MCD/02/18/005.

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introduced in a single step. For example, the Authority is aware that the legal and functional separation of incumbents elsewhere has often taken a number of years and multiple iterations to implement.

- 6.3 Nevertheless, the Authority is seeking to ensure that the Separated Entity publishes a final RO, in March 2019, that is consistent with the principles set out above, and which is feasible and moves towards the longer term pricing framework set out in the NERF.
- 6.4 As regards equivalence, the Authority is aware that it is likely to take the Separated Entity up to two (2) years to be able to provide all NBN wholesale services on a true equivalence of inputs (“EOI”) basis. The Authority does, however, require the Separated Entity to start working immediately towards full EOI and to achieve this by the end of Quarter 1, 2021. Until such time, the Separated Entity will be required to provide the wholesale products and services on an equivalence of outputs basis. This is also reflected in the draft SE Licence which is being consulted on by the Authority¹⁰.
- 6.5 Therefore, while the Separated Entity might not be efficient at the outset, it is expected to immediately start working towards enhancing its efficiency. The Separated Entity will be required to demonstrate that it is improving its efficiency over time.
- 6.6 Once the Separated Entity publishes the RO, the Authority intends to continue to work with all stakeholders in the market, including the Separated Entity and all other Licensed Operators (including Batelco Retail) to identify any further amendments that should, in due course, be made to the RO through the regular RO review process described in the NERF. As acknowledged in the NERF, in determining how frequently RO reviews should take place, the Authority must take into account a number of objectives.
- 6.7 In the interests of facilitating the transition to the new industry structure, the Authority considers it is important to conduct a RO review after the publication of the RO. The Authority intends to conduct a review within 18 months of the publication of the RO. Changes to the RO could include

¹⁰ LAD/1218/344, 13 December 2018. See section 5.4 of the draft SE Licence.

the addition of new services, and amendments to the price and non-price terms on which RO services are offered.

- 6.8 In reviewing the Separated Entity's RO, the Authority considers that, without limitation, it will need to introduce the multi-year price control envisaged by the NERF, including the level at which a price control should be set and whether there should be any upfront changes to RO prices.
- 6.9 More generally, however, in this and all other RO reviews, the Authority will review the Separated Entity's business plan and proposed investments, in order to ensure that its regulatory asset base reflects that of a reasonably efficient provider and that it is able to earn a reasonable return.

The scope of the SE product set

- 6.10 The draft RO covers active wholesale products only. This means that Licensed Operators who wish to use the Separated Entity's network will only be able to purchase (on regulated terms) active services and use these as inputs to their own downstream services.
- 6.11 The Authority has considered requiring the Separated Entity to introduce passive products in its RO. The Authority recognises that introducing passive access products at this time would be a significant change to the market, and may not be in line with the policy objectives set out in NTP4. Careful consideration would need to be given to developing appropriate price and non-price terms.
- 6.12 The Authority maintains that requiring the Separated Entity to offer additional duct rental services at this time may compromise the transition to the new industry structure.
- 6.13 Notwithstanding the above, the Authority is minded to further consider, in future RO reviews, whether a regulated dark fibre service may bring benefits to the market. In doing so, the Authority would take into account the technical requirements of OLOs, based on recognised industry standards, the state of provision of the Separated Entity's active service portfolio, and any comparable active products.

The non-price terms and conditions set out in the draft RO

- 6.14 The Separated Entity's draft RO comprises certain wholesale services previously included in Batelco's existing RO, in addition to amended versions of two of the transitional products defined in the Special Temporary Measure¹¹ (i.e., an amended version of TBS, now referred to as WBS, and an amended version of TDS¹², now referred to as DS). As noted above, the Separated Entity's draft RO does not currently guarantee that services are provided on an EOI basis, as the Authority recognises that the move to full EOI will take time. In the meantime, and as provided for in the draft SE Licence, the Separated Entity will be required to provide the wholesale products and services on an equivalence of outputs basis¹³.
- 6.15 However, in future RO reviews the Authority will continue to monitor the Separated Entity's progress towards implementing EOI and ensure that the Separated Entity RO increasingly reflects such EOI principles.
- 6.16 The Authority will also expect to review all non-price terms and conditions to ensure they reflect developments in industry best practice including international benchmarks, and enable OLOs to meet demand for the efficient provision of reliable retail services. For example, the Authority will review:
- 6.16.1 Service Level Agreements for individual services;
 - 6.16.2 Penalty and compensation provisions;
 - 6.16.3 Processes to support forecasting, ordering, provisioning and fault handling; and
 - 6.16.4 Access to information required to support EOI principles.

The introduction of the multi-year price control

- 6.17 The Separated Entity's draft RO comprises certain wholesale services previously included in Batelco's existing RO, in addition to the amended

¹¹ Available at <http://www.tra.org.bh/media/document/Special%20Temporary%20Measure.pdf>

¹² In addition MBS has also been included in the draft RO.

¹³ LAD/1218/344, 13 December 2018. See section 5.4 of the draft SE Licence.

transitional services, now referred to as WBS and DS. The price terms for the services are listed at Schedule 3 of the Separated Entity's draft RO.

- 6.18 The NERF provides that the regulatory framework must promote service-based competition in a market that is fair, effective and sustainable by ensuring a level playing field for all downstream operators. Moreover, the framework should ensure an efficient supply of telecommunications products and services and ensure that there are incentives for the Separated Entity to be efficiently resourced, able to recover its efficiently incurred costs and is allowed to earn a fair return on its investment¹⁴.
- 6.19 A key element of this framework is the introduction of a new approach to wholesale price setting: namely the building block model and the adoption of multi-year price controls. Such an approach can provide the Separated Entity with incentives to improve the efficiency of its operations, by allowing it to share in the benefits of any outperformance. Furthermore, this approach should enable it to earn a reasonable return, while also still providing constraints on pricing consistent with promoting downstream competition.
- 6.20 Given this, the Authority considers it would be premature to move immediately to the type of multi-year price control envisaged in the NERF. Rather, the Authority proposes to ensure that prices included in the Separated Entity's RO are consistent with moving towards such a framework. The Authority will seek to do this by reviewing the impact of pricing proposals on the overall return for the Separated Entity forecast in its business plan for 2019.
- 6.21 The Authority notes that an important component for setting a multi-year price control under the building block model is the Separated Entity's business plan. At this time, there remain uncertainties both for the Separated Entity and for its customers. For example, there is a risk that the Separated Entity may not be able to earn a reasonable return, if the scale of demand is less than anticipated. As regards the Separated Entity's customers, there is a risk that they may be locked into above cost

¹⁴ Paragraph 26 of the NERF.

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prices for a prolonged period, if the business is more profitable than forecast, for example as a result of higher than expected demand.

The treatment of existing OLO fibre assets

- 6.22 The implementation of a single network may, in due time, require OLOs to relinquish control of those fibre assets they currently own and control.
- 6.23 In determining the appropriate time at which these assets should be decommissioned and / or control relinquished by OLOs, the Authority will take account of the state of the Separated Entity's service provision and product set. The Authority will have regard to the impact of such process on the Separated Entity and the broader sector. The Authority considers that OLOs should be able to continue to use those fibre assets deployed until such time, for example, when the Separated Entity's active product set meets the reasonable technical requirements of OLOs, is being provided on an EOI basis and at prices in line with transitioning towards the principles of the NERF.
- 6.24 In due course, the Authority will consult with all affected stakeholders on any proposed decommissioning of OLO fibre assets and will take into consideration the costs and benefits. For the avoidance of doubt, any compensation will have regard to the asset value taking into account depreciation and will exclude any investments in network elements made after 31 December 2018.

7 SPECIFIC ISSUES IDENTIFIED BY THE AUTHORITY IN THE SEPARATED ENTITY'S DRAFT RO

- 7.1 The Separated Entity's draft RO was submitted to the Authority on 13 December 2018. It has, therefore, not been possible for the Authority to complete its review of the draft RO prior to the publication of this consultation.
- 7.2 The Authority's preliminary view is that the draft RO requires further work. The Authority considers it necessary to conduct a consultation on the draft RO prior to issuing a draft Order on the RO. The Authority will review feedback from this consultation process to inform its draft Order on the RO. The Authority intends to undertake a consultation on the draft Order in due course.

- 7.3 Accordingly, stakeholders are encouraged to provide comments that are fully substantiated and supported as far as possible by evidence. The Authority will give greater weight to those submissions where stakeholders substantiate and quantify their positions. Stakeholders should reference international benchmarks and/or industry standards relevant to demonstrating the reasonable requirements of all Licensed Operators.
- 7.4 The Authority has focused in its initial review on the proposed terms and conditions for WBS, and DS. The terms and conditions of the other wholesale services are based on Batelco's existing RO (which were subject to a detailed review at the time of the Authority's last RO Order issued to Batelco¹⁵).
- 7.5 The Authority notes that OLOs have provided comments previously to the Authority on certain service descriptions. This Consultation provides Licensed Operators with an opportunity to provide feedback on all of the service descriptions and the wider draft RO. The following sub-section provides a non-exhaustive list of high level concerns that the Authority is aware of for WBS and DS.
- 7.6 The Authority notes there may be different service inputs required by Batelco Retail to ensure continuity of service. Therefore, the Authority welcomes stakeholder feedback on the degree to which the RO product set will enable OLOs to compete effectively.
- 7.7 WBS

- 7.7.1 The reference to "Existing End Users" as a precondition to provision of the service could unduly restrict retail competition. The Authority is unaware of similar restrictions in regulatory regimes elsewhere¹⁶;

¹⁵ A final Order issued by the Telecommunications Regulatory Authority on the Reference Offer of the Bahrain Telecommunications Company B.S.C, Ref: MCD/08/16/066

¹⁶ For example in relation to the Openreach bitstream service offered in the UK, its generic Ethernet access product does not appear to include a comparable restriction:

<https://www.openreach.co.uk/org/home/products/super-fastfibreachaccess/contracts/sffacontracts.do>

- 7.7.2 Service descriptions need to be accurate and fit for purpose in order to enable OLOs to configure their networks and services. Certain definitions appear inaccurate e.g., "Access Link" does not appear consistent with the use of "GPON". There are also inconsistencies in use of terms e.g., consistency of the term "Useable Line" (see clause 4 of the relevant WBS Schedule). These inaccuracies and inconsistencies may impact OLOs' ability to assess the suitability of the service for their needs;
- 7.7.3 A principal objective is to ensure non-discrimination in SE's supply of fibre based wholesale products and services. Consideration should be given to a clear mechanism to ensure that contention ratios (if necessary at all) are applied in a non-discriminatory manner;
- 7.7.4 The SE products and services should meet the reasonable requirements of Licensed Operators including in relation to the availability of Aggregation Links. The Authority is aware that OLOs have concerns as to the range of Aggregation Links to be made available in addition to 1GB and 10GB Aggregation Links;
- 7.7.5 Differentiated pricing for WBS offered to residential and non-residential End Users should be justified;
- 7.7.6 Ordering processes need to be non-discriminatory including in relation to any limits on the number of Service Request batches that may be submitted in any one day. The Authority is aware that OLOs have concerns regarding the level of the current limitations on batches.

7.8 DS

- 7.8.1 Given competition and fibre deployment objectives, restricting the use of DS to MNOs, and for links to cell sites only, may cause undue limitation to Licensed Operators;

7.8.2 The Authority understands that a lack of detail regarding the monitoring tool may unduly restrict Licensed Operators' capacity to ensure quality of service;

7.8.3 The limited provisions related to 'Protection', especially when compared to those offered in the WDC service description may mean that DS does not meet the reasonable requirements of Licensed Operators.

7.9 Common concerns relating to both WBS and DS

7.9.1 Non-price terms including Service Level Terms are to meet the reasonable requirements of Licensed Operators and recognized industry standards. Based on comments received from OLOs, the Authority understands that OLOs consider certain of the current timeframes, particularly in relation to provisioning, may be too long;

7.9.2 Transparency regarding fibre coverage and availability is important for promoting fair and effective competition. The Authority considers that service descriptions should describe the coverage information that will be made available to OLOs;

7.9.3 The SE's termination rights should be balanced against Licensed Operator requirements. For example, the allowances for termination under the WBS service description may not be appropriate;

7.9.4 Service based competition objectives require that OLOs are able to replicate Batelco Retail products and services and able to compete effectively. The Authority considers transparency of dealings between the Separated Entity and Batelco Retail will be important to the delivery of this objective, and will be a relevant consideration in the Authority's final decision on the RO;

7.9.5 The Separated Entity will be expected to justify the proposed prices in line with the principles set out in the NERF. In particular, the Separated Entity would need to demonstrate

that prices do not enable it to earn a return in excess of cost of capital;

SEPARATED ENTITY DRAFT REFERENCE OFFER

- 7.9.6 In order to ensure interoperability and promote the timely and efficient supply of services by all Licensed Operators, the Authority considers that SE products should be vendor agnostic with regard to customer premises equipment (CPE). The Authority is therefore concerned by any conditions that mandate the use of a single vendor CPE solution.

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ANNEX 2 QUESTIONS

In responding to the below questions, stakeholders are encouraged to provide comments that are fully substantiated and supported as far as possible by evidence. The Authority will give greater weight to those submissions where stakeholders substantiate and quantify their positions. Stakeholders should reference international benchmarks and/or industry standards relevant to demonstrating the reasonable requirements of all Licensed Operators.

A. REVIEW PROCESS AND PROPOSED TIMEFRAMES FOR THE RO

1. Do you agree with the key principles and timeframes (in particular the suggested review within 18 months) the Authority will apply in conducting its review of the RO, as set out in paragraph 6.7 of the Consultation document? If not, please set out why and provide alternative principles and timeframes which you consider will better meet the objectives of sector policy?

B. COMPREHENSIVENESS AND SUITABILITY OF THE PROPOSED PRODUCT AND SERVICES SET

2. Does the draft RO meet (a) current, and (b) future needs of Licensed Operators (including Batelco Retail)?
3. Do you support the inclusion in the SE RO of all the product schedules included in the draft? If not, please set out which product schedules you consider should be excluded, and why.
4. Do you have any comments in relation to the inclusion / exclusion of legacy products in the draft RO?
5. Please indicate if you consider any products are missing from the draft RO. Please provide a high level product specification and explain why you believe such products should be included in the RO, considering for example, how such products will enable OLOs to continue to provide their current retail product set, and to compete effectively.
6. Does the draft RO include all the wholesale inputs required to support the Batelco Retail product portfolio?

7. Do you consider the draft RO is in line with transitioning to the principles set out in the NERF?
8. Please provide comments on any other areas of concern you have regarding any of the product descriptions included in the draft.

C. PROPOSED APPROACH TO ACTIVE AND PASSIVE PRODUCTS / SERVICES

9. Do you agree with the Authority's proposals not to require the SE to include passive access products in its RO at this time, as set out at paragraphs 6.10 to 6.13 of the Consultation document? If not, please set out why.
10. If you do not agree with the Authority's proposals on passive products at this time, please provide specific details including the impact on your business, and services. Please substantiate and quantify your position with supporting evidence.
11. Given the Authority's proposed approach in paragraph 6.13 of the Consultation document, what if any other factors should the Authority take into account when examining whether dark fibre should be included in the SE RO in the future?

D. NON-PRICE TERMS

12. Do you agree that it is reasonable to require the SE to offer NBN wholesale products on an EOI basis within two years, as set out in paragraphs 6.14 and paragraph 6.4 of the Consultation document? If not, please set out an alternative timetable, alongside your reasoning.
13. Do you consider that the non-price terms, as set out in the schedules to the draft RO, including supply terms and definitions, are fit for purpose and meet the reasonable requirements of Licensed Operators?

E. PRICE TERMS

14. Do you believe the price terms proposed by the Separated Entity for all the RO services reflect the principles set out in paragraph 6.1 of the Consultation document?
15. Do you agree with the Authority's proposed approach for reviewing the prices proposed in the RO and in particular, its proposal, in the longer term, to move to a multi-year price control as referenced in paragraphs 6.17 to 6.21 of the Consultation document? If not, please set out why and set out your preferred approach.

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F. PROPOSED TREATMENT OF OLO ASSETS

16. Do you agree with the criteria identified by the Authority for determining when OLOs other than Batelco Retail could be required to relinquish control of their existing fibre assets, as set out at paragraph 6.23 and paragraph 6.24 of the Consultation document? If not, please provide alternative criteria which you consider will better meet the objectives of sector policy?

G. SPECIFIC ISSUES IDENTIFIED BY THE AUTHORITY

17. Do you agree with the areas of concern identified by the Authority in relation to the WBS service description, as set out in paragraph 7.7 of the Consultation document? Please order your responses in accordance with the illustrative list of concerns set out.
18. Do you agree with the areas of concern identified by the Authority in relation to the DS service description, as set out in paragraph 7.8 of the Consultation document? Please order your responses in accordance with the illustrative list of concerns set out.
19. Do you agree with the areas of common areas concern identified by the Authority in relation to both service descriptions, as set out in paragraph 7.9 of the Consultation document? Please order your responses in accordance with the illustrative list of concerns set out.

H. OTHER COMMENTS

20. Do you have any other comments not considered specifically above that you wish to raise?
21. If so, please order your comments according to sections in the Consultation document or specific aspects of the draft RO.

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