



**Position Paper issued by the Telecommunications Regulatory Authority on
Connectivity to Cable Landing Stations**

29 March 2026

Ref: LAD 0326 007

Introduction

- 1 The purpose of this Position Paper is to clarify and affirm the Telecommunications Regulatory Authority's position in relation to the treatment of connectivity to Cable Landing Stations ("CLS") in the Kingdom of Bahrain, including interconnection between International Telecommunications Cable Systems ("ITCs").

Background

- 2 Over the last six years, the Kingdom's telecommunications sector has undergone a significant change, most notably through the creation of BNET as the provider of Bahrain's National Fibre Network.
- 3 The Government's stated policy objective, as first set out in the NTP4¹ and subsequently reaffirmed in the NTP5² is that BNET shall be the Kingdom's national provider of fibre-based connectivity. Other licensees may not deploy or maintain fixed telecommunications infrastructure.
- 4 This represented a fundamental shift in telecommunications policy in the Kingdom, with it moving to a policy of promoting service-based competition for fixed services over the single national fibre infrastructure.
- 5 The TRA considers it necessary to clarify the regulatory framework governing:
 - Interconnection between International Telecommunications Cable Systems; and
 - The deployment of additional remote SLTEs.
- 6 These clarifications are intended to promote resilience, encourage investment and ensure regulatory certainty, while preserving the integrity of the national fibre framework and preventing circumvention of applicable licensing obligations.

Definition of International Telecommunications Cable Systems (ITC)

- 7 An ITC consists of one or more telecommunications cables and all associated components that support the cable system end-to-end. This includes the cables running through territorial waters landing in the Kingdom and terrestrial cables connecting through borders up to the point where they physically terminate at the CLS.³

¹Resolution No. (29) of the year 2016 Promulgating the Fourth National Telecommunications Plan, The Council of Ministers.

² Resolution No. (17) of the year 2020 Promulgating the Fifth National Telecommunications Plan, The Council of Ministers.

³ See page 44 of *Federal Communications Commission FCC-CIRC 2508-03*.

Definition of the Cable Landing Station (CLS)

- 8 For the purpose of this paper, we have defined CLS as “the point at which any ITC landed in Bahrain connects to another public telecommunications network within the Kingdom”.⁴ In other words, the CLS is the demarcation point between the international and national networks. A CLS is a physical facility – comprising buildings, equipment, and land – that houses the infrastructure necessary to establish and maintain the connection of an ITC landed in Bahrain into a public telecommunications network within the Kingdom.⁵ In accordance with this definition, each ITC may only have a single CLS.⁶
- 9 Figure 1 below shows the typical basic elements of a CLS and the international part of the submarine cable system.

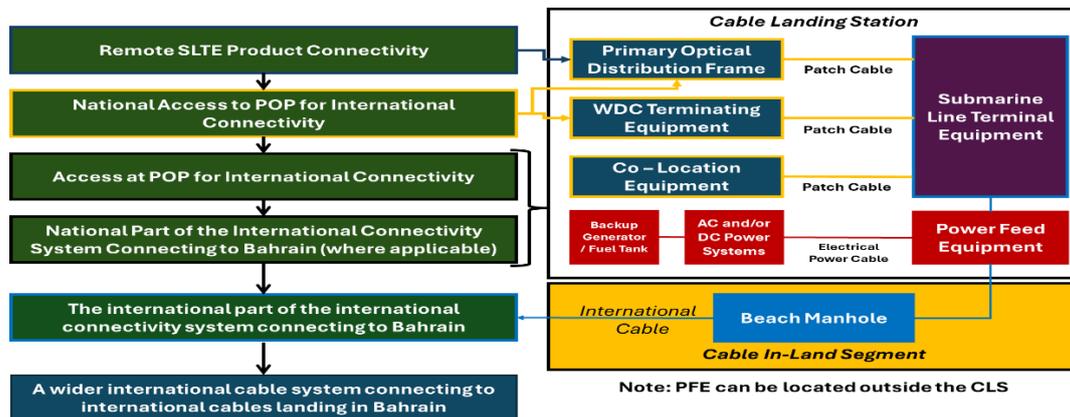


Figure 1: CLS

What Qualifies as an International Cable Route

- 10 Fibre cables which connect international cables to the CLS do not form part of the national fibre infrastructure. Such cables are therefore not subject to the National Broadband Network restrictions. Accordingly, licensed operators other than BNET may, with the TRA’s consent, deploy their own fibre cables as part of an international cable route (provided of course that they possess the appropriate licences – namely the International Facilities Licence).

⁴ See definition of Cable Landing Station in the International Facilities Licence.

⁵ *Ibid.*

⁶ The TRA notes that in some cases a single subsea or terrestrial telecommunication cable can support multiple, independent systems. In addition, in some cases an ITC can have multiple landing parties each controlling and using separate pairs of fibre. As such, the TRA will review each application separately and evaluate the Landing Parties request based on the merit of the requests.

- 11 A CLS is the first point of presence for international/customer connectivity which often hosts the Submarine Line Terminating Equipment (“**SLTE**”).
- 12 The TRA would typically favourably consider any request by a duly licensed operator to deploy its own fibre where:
- The inland fibre cable extension is deployed through BNET ducts or through ducts built by BNET for the appropriate Licensed Operator;
 - The inland fibre cable extension is used exclusively for the purposes of connecting the international cable to the CLS;
 - In the event that the inland fibre cable extension deployed in Bahrain transits via any other location (be it a point of presence (“**POP**”) or any other point) then this location will be limited to re-powering purposes only;
 - The licensee would undertake that the inland fibre cable connectivity to the CLS will not be spliced with any other cables forming part of the domestic network and will not be interconnected with any fibre cables or national active equipment at any POP before it reaches the CLS;
 - No international capacities will be provisioned from any location other than the CLS; and
 - The licensed operator does not have more than one CLS for each international cable.
- 13 The TRA reserves its right to verify that licensed operators authorised by the TRA under paragraph 8 do not by-pass BNET’s network by connecting the CLS with the POP and/or other CLSs.

Remote SLTE

- 14 The TRA requires that all ITCs have a single CLS. However, we are aware that there is continuous innovation in international systems. The TRA always wishes to take a pro-active approach to ensuring that its framework supports innovation while being rooted in maintaining efficient competition between market players. Therefore, the TRA confirms that it is possible to have more than one SLTE on an international cable located remotely from the CLS.

- 15 To clarify, an additional remote SLTE is a location where telecommunications equipment is placed that can act as a point-of-presence to access capacity on the relevant ITC. For the avoidance of doubt, a remote SLTE does not necessarily require the installation of an SLTE device and may instead consist of transmission equipment that enables access to capacity on the relevant ITC.
- 16 However, the physical location of additional SLTEs does not alter the fact that the CLS remains the demarcation point between international and national networks.
- 17 The connection between the CLS and any remote SLTEs will need to be deployed using a BNET Reference Offer product that is designed and priced to meet this market need.
- 18 Based on the foregoing, BNET is invited to introduce a new Reference Offer product to support connectivity from the CLS to any remote SLTE. The specification and pricing of which should meet the market needs and be priced on the TRA's strategic principle:
- “Connectivity capability that enables Licensed Operators (e.g., Mobile Network Operators), to continue to provide the most advanced services possible, at prices that sustain Bahrain's global competitiveness. *This means that Licensed Operators which can no longer deploy their own fibre infrastructure, are not cost disadvantaged compared to other countries*”⁷.
- 19 The request for remote SLTEs shall be made by following the process outlined below:
- The request for remote SLTEs is to be submitted by an ISL holder by providing the details and filling in the requisite form (attached and marked Annex A); and
 - Following successful negotiation with the relevant Landing Party (where the IFL holder and the Landing Party are different), the requesting party may approach BNET for the provisioning of the relevant Reference Offer product.

Interconnection between International Telecommunications Cables

- 20 There is an increasing demand to be able to interconnect two International Telecommunications Cable Systems to enable services to be provided. This capability is needed to provide alternative routings and to provide capacity to countries where the original cable may not land. The Kingdom's strategic location and its pro-

⁷ See “BNET Economic Regulatory Model – A Forward Look”. Ref: LAD/1023/011).

competitive regulatory regime make it a natural transit hub. The TRA will clarify its guidance to enable interconnection between two separate cable systems.

- 21 The process of landing an ITC begins with an IFL holder submitting its request to the TRA for approval. The TRA acts as the single point of contact for such requests and will coordinate with any other relevant authorities whose approvals may be required. For the purposes of this paper, the TRA distinguishes between the ('**Landing Party**') which is an IFL holder that is authorised to land and operate the national segment of an ITC, and a ('**Cable Owner**') which owns and operates the international segment of the ITC (i.e. usually a consortium). A Landing Party and a Cable Owner may in some cases be the same entity.
- 22 We therefore consider that the interconnection of two international cables (even if carried out in the territory of the Kingdom) forms part of the international connectivity and does not form part of the national network framework. As such, a Landing Party which lands and operates multiple ITCs may interconnect those ITCs. Furthermore, two IFL holders which land two different ITCs may interconnect their respective ITCs under commercially agreed terms, provided that this interconnection is intended solely to enable transit of international traffic. For the avoidance of doubt, this interconnection may not be used to serve any locally originated or terminated traffic.
- 23 The interconnection of two or more ITCs in Bahrain will be allowed where the following conditions are met:
- (i) The Licensed Operator is in possession of an IFL and is the Landing Party of the ITC(s);
 - (ii) Interconnection is permitted strictly for international capacity transit; and
 - (iii) Such interconnection must not be used to interconnect domestic networks or bypass national infrastructure or undermine the applicable regulatory framework.

Annex A: NOTIFICATION FORM FOR REMOTE SLTE REQUESTS

BASIC DETAILS

Licensee Name: _____

Licence Type/ Licence Number: _____

Address (if not received by email): _____

Date of Submission: _____

REMOTE SLTE DETAILS

**Designated International
Telecommunications
Cable:**

Remote SLTE location:

**BNET Reference Offer Product
Requested:**

Number of Fibre Pairs:

Intended Use:

End Customer:

CONTACT DETAILS

Name and Position of Authorised Representative _____

Contact Number / Email Address _____