



**RESPONSE BY**  
**BAHRAIN TELECOMMUNICATIONS COMPANY B.S.C.**  
**TO THE PUBLIC CONSULTATION**  
**ISSUED BY**  
**THE TELECOMMUNICATIONS REGULATORY AUTHORITY OF BAHRAIN (TRA)**  
**ON**  
**BNET'S PROPOSAL TO AMEND ITS REFERENCE OFFER BY INTRODUCING A NEW SERVICE "CLOSED BITSTREAM SERVICE" AND UPGRADING THE EXISTING WBS ESSENTIAL AND WBS ADVANCED BANDWIDTHS**  
**SUBMITTED ON**  
**18 September 2024**  
**(Batelco Ref: GCL/83/24)**



## INTRODUCTION

1. Bahrain Telecommunications Company (B.S.C.) ("**Batelco**") welcomes the opportunity to respond to the Consultation Paper on BNET's proposal to amend its Reference Offer ("**RO**") by introducing a new service "Closed Bitstream Service" ("**CBS**") and upgrading the existing Wholesale Bitstream Service ("**WBS**") Essential and Advanced bandwidths (the "**Consultation**") published by the Telecommunications Regulatory Authority (the "**Authority**") on 12 August 2024 (Ref: LAD/0824/044).
2. No part of this response to consultation is confidential.
3. Batelco's principal contact for this response is:

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## RESPONSES TO CONSULTATION QUESTIONS

### I. The Proposed Amendments

**Q1 Do you support the introduction of the Closed Bitstream Service (CBS)? If not, please provide your reasons.**

4. Notwithstanding the responses below, Batelco supports the introduction of the Closed Bitstream Service (CBS).

**Q2 Do you support the proposed upgrades to WBS Essential and WBS Advanced bandwidths? If not, please provide your reasons.**

5. Batelco does support the proposed upgrades to WBS Essential and WBS Advanced bandwidths. However, Batelco requires BNET's confirmation that the appropriate testing has been conducted and that the results:
  - a. Provide confirmation that the proposed 2 Gbit/s speed is achievable. Or if unachievable, clarity on the maximum achievable speed.
  - b. Confirm the extent of BNET's network readiness in terms of providing multiple end users within a contained time and location with high bandwidths of 1 Gbit/s and 2 Gbit/s.

This is to ensure transparency with Licensed Operators and end customers alike. Batelco does not wish to market speeds which are unachievable and not meet appropriate quality of service standards.

6. Additionally, to guarantee the success of the proposed bandwidths, Batelco requires clarification from BNET on the minimum device specifications needed to achieve the 2 Gbit/s speed.

### II. Non-Price Terms

**Q3 Do you consider that the non-price terms outlined in the proposed amendments are fit for purpose and meet the reasonable requirements of LOs?**

#### WBS Upgrades

7. Batelco does not accept BNET's proposal to directly upgrade end-customers and agrees with the Authority's statement that *"BNET is a wholesaler and should not dictate the commercial strategies of LOs in the retail markets, it should be for the LOs to define their*



*own retail strategies.*” As such, while BNET may choose to automatically upgrade speeds, Licensed Operators should be able to choose the speeds it will make available to end customers, as well as when and how it will market these speed changes.

8. Should the proposed speed of 2 Gbit/s be made available, Batelco requires BNET to provide either new or replacement ONTs free of charge to end-customers migrating, upgrading, or subscribing to the 2 Gbit/s WBS bandwidth. Existing ONTs do not support the 2 Gbit/s speed.

### CBS

9. BNET describes CBS as a “*data only service based on demand from national or public security entities in the Kingdom of Bahrain and provides special features facilitated through the provision of a private VLAN*” – but fails to clarify what the special security features are. The provision of a VLAN through a separate aggregation is not sufficient justification to label the product ‘*secure*’ as a similar capability is already available in the RO, as pointed out by the Authority itself. The description ‘*secure*’ without sufficient security features is misleading to Licensed Operators and end customers. BNET should clarify what additional security features make part of this product.
10. Considering the above, Batelco does not find BNET’s proposal to limit the CBS product to national and public security entities justifiable as the security features provided through CBS are unclear.
11. Batelco notes that through the introduction of CBS, BNET proposes to provide a private VLAN, routed to a handover point on BNET’s network, for each CBS connection. However, Batelco asserts that there should be an alternative technical setup where the private VLAN is aggregated to go through a Licensed Operator’s network. This will allow Licensed Operators the visibility and monitoring capabilities of CBS usage and the ability to provide technical support to end customers where required.
12. Regardless, it is Batelco’s view that Licensed Operators should have visibility and monitoring capabilities on the usage of CBS because the bandwidth of CBS and WBS are shared. Licensed Operators must be able to ensure that WBS services are not impacted by CBS usage.
13. Batelco does not agree with BNET’s proposal to limit the 10 Gbit/s aggregation link to a maximum of one Licensed Operator Point of Presence. Instead, we recommend that the terms of supply for a 10 Gbit/s aggregation link should mirror those of 1 Gbit/s links, where it is permitted to connect up to 2 geographically dispersed Points of Presence. This set up



ensures that, in the event of an aggregation link failure, failover traffic from the main site can be routed to the geographically redundant site.

### III. Price Terms

#### **Q4 Do you agree that the proposed price terms for the CBS and the upgraded WBS services meet the FRAND requirements?**

##### CBS

14. The technical description provided by BNET for the CBS product is not significantly different than that available through WBS Advance. Therefore, and in consideration of the position set out in paragraph 9 above, Batelco does not agree with the additional BD 10 on each CBS package.
15. BNET's proposed supply term for WBS aggregation links which sets out that *"any additional aggregation link for CBS to be provided by the Access Provider separately and may be included in the MRC for the relevant CBS service based on the Access Provider's assessment of the specific nature of the requirement of each Qualified End User"* is vague and suggests that different prices may be imposed for different Licensed Operators. This should be clarified, and it should be ensured that there is no discriminatory treatment between Licensed Operators.
16. Batelco requests that BNET treat each first aggregation link equally and provide it free of charge regardless of the link speed.

### IV. Other Comments

#### **Q5 Do you have any other comments regarding BNET's proposal? If you do, please explain these in relation to (a) their impacts on competition; and (b) their impacts on consumers.**

17. Batelco disagrees with the Authority's statement that the *"increase in the capacity of the aggregation link will offset costs associated with possible increases in peak traffic as a result of the increase in WBS speeds"*. Costs incurred by Batelco will not be offset by the WBS speed upgrade.
18. Batelco would like to highlight that some end customers are still being provided Very High-Speed Digital Subscriber Line (VDSL). The speeds achievable by VDSL are very limited in comparison to those through fiber technology and as such, Batelco requests that BNET provide a migration solution for these customers to migrate to fiber. This request is in line



with the government policy reiterated throughout the Consultation, regarding availability of fiber to all residential users at speeds over 1Gbps. Alternatively, BNET should provide a solution to overcome the 40mbps speed limitation restricting VDSL customers.