



Ref No.: Cor/ECTEL

March 9, 2023

Mrs. Cheryl Hector-Fontenelle
Managing Director (Ag)
ECTEL
5th Level, Baywalk
Rodney Bay
Gros Islet
Saint Lucia

Dear Mrs. Hector-Fontenelle,

Re: Public Consultation on Revised and Updated Draft Electronic Communications (QoS) Regulations

Your email dated January 6, 2023, on the above subject matter refers.

Having reviewed the Consultation document the NTRC wishes to make the following comments: Note that the page numbers listed on the left of each point refers to the page number of the pdf document as the different sections of the document has different numbering.

1. Pg. 30. Question 1: Do you consider it reasonable to define a national level reporting area, comprising the entirety of each individual state, in the draft revised and updated regulations? Should the reports also cover any sub-national areas? Please support your answer and any suggestions with relevant information and internal or best-practice references.

A national level reporting area is reasonable. However sub-national areas are also important to determine how different areas compare to the whole. For instance, the Grenadines normally has some different QoS issues as compared to the mainland so the definition of a reporting area of the Grenadines will help us to see how service quality compares

1. Pg. 35. Question 8: Do you find it reasonable to require that the report on QoS performance should be submitted within a month from the end of the reporting period? Please support your answer and any suggestions with relevant information and internal or best-practice references.



Yes, 1 month is reasonable...however whether you will get the report in a month is another story!!

Pg. 52. Section 5.27.5 is not clear.

Pg. 59. Section 5.36.3 is not clear why ECTEL is specifying both national and international metrics for the fault repair time for leased lines when benchmark countries have one metric.

Pg. 61. There is a typo in the section 5.37.5 where there is a reference to the QoS regulation of 2018. This should be 2016.

Pg. 66. The section 5.42.4 is not clear on what MOS means with regards to the contents of the table in Exhibit 53, page 66.

Pg 79. There is a typo on Page 1 of the regulation. The text should read "...to address some issues identified in an internal analysis of this regulation..." and not be "...to address some issues identified in an internal analysis of this regulations.

2. **Pg. 83** definition of work day- This definition should read "any week day".

"working day" means any day that is not a public holiday in [ECTEL Contracting State], between 8:00 a.m. and 5:00 p.m.;

The above comment applies to the definition as well in the Second schedule.

Pg 84. Sub-regulation 6 (3) The Commission shall on a recommendation of ECTEL, determine the geographical scope in sub-regulation 6(2) for [ECTEL Contracting State].

a. This suggests that ECTEL will recommend the geographical scope for the contracting state, however, the Commission will be best suited to recommend geographic scopes based on activities within its jurisdiction.

- b. Further, if selected geographical scopes are chosen, then operator may concentrate more on such areas to report favorable values and may neglect other areas outside the scope.
- c. Wouldn't it be possible for the operator to report on a national level with a breakdown by set geographical areas?

Pg 85. Regulation 7. The inclusion of the new provision in Regulation 7 is welcomed. The NTRC has been practicing monitoring some parameters on fixed broadband and public mobile services.

Pg 85. Sub-regulation 8 (4) The Commission shall submit to ECTEL, on a quarterly basis, a report on information on quality of service in [ECTEL Contracting State].

- a. It is not clear on the format of such report that is to be submitted to ECTEL. It is recommended that the format of such report be included.

Pg 86. Section 10, Record keeping indicates that a licensee shall retain quality of service data, all measurements and related records for a minimum period of eighteen (18) months after the end of the reporting period or until such time as the Commission may direct.

- a. It is recommended that the minimum time be extended to 24 months.

Pg 86 Section 11, Submission of Reports to the Commission (1) A licensee shall submit to the Commission, on a quarterly basis, a report as outlined in the Second Schedule on the last working day of the month following the end of the quarter.

- a. It is recommended that a deadline time in the quarter need to be outlined to say when the report should be submitted by.

3. **Pg. 87.** Section 13(3), it makes no sense that the licensee is given 14 days to submit additional information, which in my opinion should be information the licence has on hand relating to the report submitted, but only 5 days to submit an amended report as per section 11(5). These timelines should be switched.

13(3) Upon receipt of a written request from the Commission, the licensee shall submit the additional information to the Commission and in accordance with the directions provided by the Commission, within [14] days of the request.

11(5) The submitting licensee shall resubmit an amended or corrected version of the report to the Commission within [5] days of the request, under sub-regulation 11(4).

4. Pg 91. Section 15. Advance Notice of Interruption

A licensee shall give its customers notice at least [2] days in advance of any planned interruption of service, by publishing a notice by text message, email, other online application or print media.

- It is recommended that at least two mediums should be used for the publication of the Advance Notice of Interruption.
- It is also recommended that the licensee should give its customers notice at least (5 days) in advance instead of 2 days.
- It is recommended that a mandatory inclusion of national radio station is included as one of the mediums.
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Pg 95. Second Schedule – Part 1 Definitions

- b. This section includes definitions, however, does not include any formulae that will assist licensees in the gathering and calculation of data. Such will eliminate ambiguity. See “GSMA Definition of Quality of Service Parameters and their Computation”
- c. The term “answered customer serv. call ratio” seems to be incomplete. It is suggested that the entire term be written for clarity. Additionally, the definition says “the percentage of completed call attempts to the licensee’s customer support services” This may be misleading noting that many operators have IVR systems to answer calls, however, customers may not always have the opportunity to speak with an agent to have their concerns addressed.

Pg 96. Second Schedule – Part 1 Definitions

- a. The definition for “complaint submission ratio” can be interpreted to mean the number of complaints a single customer would have made in the data collection period. It is recommended that the definition be rewritten such that it refers to the ratio of complaints received compared to the number of customers.

Pg 101. Second Schedule Part 3 Subsection (3). The statement is not clear. Should it be that the Commission may request additional information from the licensee?

Pg 106. Part B, Section B.1 – Fixed Telephony Services

- d. P10 Call set-up success ratio – It is recommended that a breakdown be included for On network and off network calls
- e. P11 Call set-up time – It is recommended that a breakdown be included for on network and off network calls

Pg 108. Part C, Section C.1 – Fixed Telephony Services

- a. P10 Call set-up success ratio – It is recommended that a breakdown be included for On network and off network calls
- b. P11 Call set-up time – It is recommended that a breakdown be included for on network and off network calls
- c. P22 Complaints resolution time – Suggest that a breakdown be included for prepaid and postpaid

Pg 110. Part D, Section D.1 – Fixed Internet Services

- a. P8 Latency – The target level for latency of 95% in 200ms seems rather generous. Recommendation to include 95% in 150ms.
- b. P10 Effective vs subscription throughput ratio – This is listed as a measure that is reportable. Could this be also listed as one that will be monitored by the Commission?

Pg 111. Part D, Section D.2 – Wireless Internet Services

- a. P8 Latency – The target level for latency of 95% in 200ms seems rather generous. Suggest including 95% in 150ms.

Pg 125. The Definition of billing accuracy has a typo. “that” should replace the comma.

“billing accuracy” means the measure of the number of incorrect bills per 1000 bills issued, has been determined by the licensee or the Commission to have been issued with an error

Sincerely yours,


Apollo Knights
Secretary / Director

CC: Alvin Augustin / ECTEL- Spectrum Officer