

# **Public Consultation Document**

**On**

## **STC draft revised Reference Interconnection Offer (RIO)**

Issued by the CITC in Riyadh, 18/12/1427H; 08/01/2007G

## **1. Introduction**

The Telecommunications Act (the “Act”) is the primary legislation governing the telecommunications sector of the Kingdom. It creates a high-level framework upon which the other Communications and Information Technology Commission (the “CITC or “Commission”) statutes build.

Chapter Seven of the Act provides the CITC with a broad power to establish the terms that govern public network access in Saudi Arabia. The other CITC statutes, including the Telecommunications Bylaw (the “Bylaw”), contain provisions that reinforce the general power of the CITC under Chapter Seven of the Act.

Consistent with Article Three of the Act, one of the principal key objectives of the CITC is “to ensure creation of a favourable atmosphere to promote and encourage fair competition in all fields of telecommunications”. Such a favourable atmosphere should facilitate and complement the Government’s ongoing ICT sector liberalization process.

CITC Decision 1/1423 classified the Saudi Telecommunication Company (STC) as a dominant service provider. Once so classified, STC became subject to the relevant provisions of the CITC statutes that apply to dominant service providers. This includes the provision of access to telecommunications facilities at any technically feasible point, and under the same terms and conditions and quality as the dominant operator provides for its own services, or those of its affiliates.

As an initial step to facilitate network interconnection and access, the CITC issued interconnection Guidelines in November 2003 and mandated preparation of a Reference Interconnection Offer (RIO) by STC. The initial RIO was approved by the CITC in Decision 73/1426 dated 21/3/1426H.

On 21/03/1427, the CITC issued Decision 113/1427 approving the first update of STC’s RIO subject to certain revisions required by the Decision. Decision 113/1427 also required that the approved RIO be reviewed and a revised RIO issued within one year from the date of the Decision. Concurrently with the Decision the “Report on CITC’s Review and Analysis of STC’s Revised RIO” was published on the CITC web site.

On 16/10/1427H (07/11/2006G), STC submitted to the Commission for approval a draft of the proposed revisions to the RIO. The draft revised RIO which is the subject of this Consultation includes the following major additions and revisions:

- In span interconnect link - new service.
- Wholesale data local access services - new service.
- Collocation and infrastructure sharing - service revised to facilitate interconnection and access to the STC Network.

- GSM mobile network technical information - to describe technical requirements for interconnection to the STC GSM network.

The relevant RIO Annexes and Schedules are revised accordingly. All changes proposed in the draft revised RIO are identified in the Document History and Version Control Record which is included at the beginning of each section of the RIO.

## **2. Consultation Process**

The CITC invites all members of the public, whether in Saudi Arabia or abroad, including private individuals, public organizations, and commercial entities to participate in this consultation process.

The objective of this consultation process is to provide interested parties with the opportunity to provide comments to the CITC on STC's draft revised RIO and to assist the CITC in its decision regarding the approval of the draft revised RIO. The draft revised RIO, dated 16/10/1427H (07/11/2006G), is published along with this Public Consultation. Respondents are also encouraged to refer to Chapter 6 of the Bylaw, the Interconnection Guidelines and the Report on CITC's Review and Analysis of STC's Revised RIO which is published on the CITC website along with current approved STC RIO.

The CITC invites interested parties to provide detailed comments on any and all clauses of the STC RIO, and particularly on those specific points raised in this Public Consultation Document.. The comments should be supported to the extent possible with relevant rationale, justifications, data, benchmarks and analysis.

In providing the comments, parties are kindly requested, where appropriate, to indicate the clause numbers in the above mentioned documents to which their comments relate.

The parties are also kindly requested to specify contact details including the name of the party in addition to the address and phone number(s).

The consultation document and any responses to it are not binding to the CITC. All responses are the property of the CITC

Responses to this Public Consultation should be submitted to the CITC (in Microsoft Word format) on or before 03:00 pm local time 17/01/1428H (05/02/2007G) to either one of the following addresses:

1. E-mail to: [RIO\\_publicnotice@citic.gov.sa](mailto:RIO_publicnotice@citic.gov.sa)
2. Delivery (hard and soft copy) by hand or by courier to:  
The Office of the Governor  
Communications and Information Technology Commission  
King Fahad Road

Riyadh 11588  
Kingdom of Saudi Arabia.

### **3. Request for Comments on STC’s proposed revisions to the RIO**

This Section requests interested parties to comment on any and all clauses of the draft STC RIO, and particularly on those specific points raised in this Public Consultation Document, many of which relate to the draft revisions proposed by STC including those introduced pursuant to Decision 113/1427.

#### **3.1. Primary Document**

Please provide comments on the Primary Document

#### **3.2 Annex A: Definitions and Glossary of Terms**

Please provide comments on Annex A

#### **3.3 Annex B: Billing Processes and Procedures**

Please provide comments on Annex B

#### **3.4 Annex C Technical Information**

Please provide comments on Annex C

#### **3.5 Annex D: Management of Interconnection**

Please provide comments on Annex D

#### **3.6 Annex E: Forecasting**

Please provide comments on Annex E

#### **3.7 Annex F: Price List**

Please comment on Annex F, and specifically on the issues raised below.

##### **3.7.1 Schedule 2A Voice Call Termination Service to STC Geographic Number Ranges**

The RIO provides one single rate for call termination to STC Geographic Number Ranges. Please comment on the appropriateness of offering separate rates for single tandem and double tandem calls.

### **3.7.2 Schedule 3B In Span Interconnect Link Service**

Please comment on Schedule 3B, and specifically on the following:

STC proposes that all charges should be bespoke and subject to a 3 year commitment. Please comment on the In Span Interconnect Link charging structure and the 3 year minimum commitment period proposed by STC.

### **3.7.3 Schedule 4E Wholesale Data Local Access Service**

Please comment on Schedule 4E, and specifically on the issues raised below.

Clause 1.1. STC proposes that the Wholesale Data Local Access Service be subject to a minimum commitment of 500 E1 circuits. Please comment on whether there should be a minimum volume commitment, and if so, at what level it should be.

Clause 1.3. STC proposes that the service be available only to Other Licensed Operators who hold either a mobile network operator license or a data service provider license. This restriction would exclude provision of the service to Fixed Facilities Based Providers (FBPs). Please comment on the need to provide this service including to Fixed FBPs.

Clause 2. Please comment on the amounts and the discount structure of the Connection and Rental Charges proposed by STC.

## **3.8 Annex G: Service Schedules**

Please comment on Annex G, and specifically on the issues raised below.

### **3.8.1 Call Transit Service**

The RIO does not currently contain a call transit service to allow Other Licensed Operators (OLO's) to terminate calls on each others networks by transiting the calls through the STC network. Please comment on the need for such a service to be included in the STC RIO.

### **3.8.2 Schedule 3B In Span Interconnect Link Service**

Please comment on Schedule 3B, and specifically on the issues raised below.

Clause 1.3 and 1.4. STC proposes that the costs incurred by STC to provide the In Span Interconnect Link service must be reasonable and commercially viable, and that if there are other viable alternatives which are more economical, then the OLOs requesting the service will bear all costs incurred in providing the service. Please comment on the appropriateness of this requirement and provide alternatives, if applicable.

Clause 1.5. STC proposes that 6 months advance notice is required in order for them to assess the feasibility of a request for In Span Interconnection. Please comment on the appropriateness of the required interval including if possible with reference to international practices.

Clause 2. Service Definition The Point of Interconnection is defined to be located at the Footway Box located within the curtilage of the building containing the OLO switch connection. Please comment on the appropriateness of the requirement including if possible with reference to international trends and practices.

### **3.8.3 Schedule 4D Wholesale Data Local Access Services**

Please comment on Schedule 4D, and specifically on the issues raised below.

Clause 1.5. STC proposes to provide the Wholesale Data Local Access circuits to the OLO for a maximum period of two years. In the document entitled “Report on CITC’s Review and Analysis Of STC’s Revised RIO” published on the CITC website, CITC stated its intention to encourage infrastructure investment, and that the offer of these circuits by STC should therefore be subject to a ‘sunset clause’. “The exact date shall be dependent on the roll-out plans and progress of the other licensed service providers, and shall be determined by the CITC two years from the date of the Decision.” Please comment on the appropriate period for such a sunset clause.

Clause 1.6. STC proposes to restrict the OLO from using the Wholesale Data Local Access service to serve existing STC customers. Please comment on this restriction including if possible with reference to international trends and practices.

Clause 1.7. STC proposes that the use of the Wholesale Data Local Access service by an OLO for services other than for the provision of internet services and to connect the sites of its existing Multi Site Business Customers, shall be subject to specific agreement between the parties. Please comment on this proposal.

Clause 1.8. STC proposes to restrict the OLO from using the Wholesale Data Local access service “in order to resell his international capacity”, or to provide the International Data Circuits to his customers. Please comment on this restriction including if possible with reference to international trends and practices

#### **3.8.4 Schedule 5A Interconnection Equipment Collocation Services**

Please comment on Schedule 5A, and specifically on the issue raised below.

Clause 1.4. STC proposes that a minimum of 6 months advance notice is required in order for them to assess the feasibility of each request for collocation service. Please comment on this requirement including if possible with reference to international practices.

#### **3.9 Annex H: Operations and Maintenance Manual**

Please provide comments on Annex H

#### **3.10 Annex I: Quality of Service Measures**

Please provide comments on Annex I