سلطنة عُمان
Sultanate of Oman

هيئة تنظيم الاتصالات
Telecommunications Regulatory Authority

Annex – 1.1

Decision on Omantel's RAIO (Service Delivery Times)

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1. Introduction

In line with RAIOs elsewhere, Omantel's Second Draft RAIO contains a number of provisions setting out the maximum period of time a Requesting Party may need to wait for a new A&I service to be delivered, after it has placed its order. To promote efficient and fair downstream competition, it is important that these timeframes are reasonable (i.e., not unduly long) and do not favour the Providing Party's own downstream business. The TRA has therefore reviewed the timeframes proposed by Omantel in the Second Draft RAIO and sets out in this Annex its findings and decision.

2. TRA's Position

In reaching its final position, the TRA has considered each of the proposed timescales referred to in the draft RAIO documents. In doing so, it considered the full text of representations made by Omantel and commenting parties, the practice quoted by respondents, the impact of each proposal on Omantel as well as on the party seeking the relevant product or service and where appropriate, the impact of the proposed delivery time on the Requesting Party's end customers. For the avoidance of doubt, this includes submissions made to the TRA during and following the industry meetings held by the TRA from 6th to 8th March 2017.

These submissions are presented below in summary form. Specific proposals made by each party, together with the TRA's final decision on appropriate delivery times and so on, are then set out in **Table 1.1**. The fact that some of the representations may not be summarised here does not mean that the TRA has not considered fully the comment in question. In addition, this Annex does not include any information or submission which the comment's author has identified as confidential. The TRA, in considering any such information, has also taken into account the fact that other parties have not been able to comment on confidential submissions.

3. Industry Comments

The comments below were made in addition to any representations made during the initial consultation process issued by the TRA in August 2016.[1] For the avoidance of doubt, these have also been considered by the TRA in its review of Omantel's proposed service delivery times.

3.1 Omantel

During the industry meeting, Omantel explained that the delivery times set out in its Second Draft RAIO are based on its assessment of the time required to undertake the internal processes underlying each required task, whilst also taking into account benchmarks from RAIOs elsewhere and the industry's feedback on Omantel's First Draft RAIO.

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1 "Review of Draft Reference Access and Interconnection Offers (RAIOs) - Public Consultation on Omantel's and Ooredoo's Draft RAIOs", August 2016.

Omantel stressed that applying benchmarks to delivery times requires careful consideration of the underlying end-to-end delivery processes and wider context of the benchmarks (i.e. in terms of market environment),[2] to ensure that such benchmarking is done on a like-for-like basis. Omantel further elaborated on this point as part of its written submission after the meeting.[3]

Omantel further noted that it often takes 15-20 days for the Providing Party and Requesting Party to agree what is actually needed, which is followed by several days of testing (i.e., 6-7 days). In Omantel's view, this needs to be taken into account when setting and/ or reviewing delivery times.

Based on its own benchmarking exercise, mostly focusing on Batelco (Bahrain) and BT (UK),[4] Omantel considered its proposed delivery times for the local loop unbundling service (LLU), terminating segments of leased lines and the wholesale transmission service are in line with (or quicker than) those in Bahrain and the UK. For example, according to Omantel, end-to-end delivery times for LLU services are six months in the UK and 120 days in Bahrain. Similarly, Batelco's delivery time for Wholesale Local Access services is 22-72 working days.

As part of its written submission, Omantel confirmed that it will prepare flow diagrams for all ordering and delivery process as part of the Joint Manual. This Manual will be prepared jointly with the industry and approved by the TRA.

3.2 TeO

During the industry meeting, TeO stated that it had benchmarked Omantel's proposals against RAIOs in Bahrain and Europe and that based on this, it concluded that the delivery times set out in Omantel's Second Draft RAIO were too high. TeO supported this viewpoint with its submissions before and after the meeting **(see Table 1.1)**. Whilst TeO agreed that all benchmarking needed to be conducted carefully, it stated that all benchmarked service delivery times it provided referred to the end-to-end process, from service ordering to the hand-over of the service to the Requesting Party. As part of its written submission, TeO further disagreed with Omantel's claim that the size and population of a country should impact the A&I service delivery times, arguing that European benchmarks disproved Omantel's point.

In TeO's view, the delivery times for each individual service need to be defined separately, rather than referring to generic delivery times (as done by Omantel for certain tasks within the overall delivery process for its A&I services). It considers it important that these service-specific delivery times include all activities from

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2 During its presentation (and subsequent written submission), Omantel stressed that Batelco in Bahrain was facing a very different operating environment (in terms of population, population density and size of the country). In addition, it pointed out that Batelco has also gone through several revisions to its RAIO. In Omantel's view, these factors limit the extent to which Batelco's RAIO can be used as a benchmark for Oman.

3 For example, as part of its written submission, Omantel stated that the RAIOs of Batelco and BT both have additional timelines and processes for testing in the Joint Working Manual, which are not included in the Service Annexes. However, Omantel's service delivery timelines include the testing process.

4 Omantel presented its key findings during the industry meeting and shared the presented slides with the TRA after the meeting.

when the order is received (correctly) from the Requesting Party, to the service being provisioned and handed over to Requesting Party. As such, it felt there was no need for Omantel to refer in its RAIO to an additional generic service ordering process, with order acknowledgments, since this should be included in the service-specific delivery times, where applicable.

TeO focused its comments on service specific delivery times on those A&I services which are directly used in the provision of retail services (such as, Wholesale Line Rental, bitstream and Carrier (pre)selection services). In TeO's view, the efficient delivery of these services is critical if it is to be able to compete with Omantel in the relevant downstream retail market. It therefore considers that these services should be the focus of the TRA's review.

TeO also recommended that Omantel's proposed delivery times and provisioning processes for these "retail-related" A&I services should be compared to the Mobile Number Portability (MNP) process implemented by the same parties. This is because it considers that the two processes are similar, with the agreed process for MNP proving that both operators are fully capable of implementing an efficient retail-oriented provisioning and service delivery process.

Further, TeO argued that in order to offer an efficient service delivery process, it is important that the Providing Party implement a "professional" planning and stock management process for A&I service related equipment, to avoid delays in the delivery process due to the need to (re)order equipment.[5]

As part of its written submission, TeO further commented on the individual process steps required to deliver an LLU service, in order to illustrate that, according to TeO, it is possible to deliver the LLU service on a per customer basis within the five (5) working days. However, TeO acknowledged that for customers who are not connected to the Omantel network the LLU process might take longer, since the line may have to be tested end-to-end by Omantel before being patched across to the Requesting Party. Hence, according to TeO, adding a further 3-5 working days to the above process would seem reasonable for these customers.

3.3 Other Licensees

All other licensees provided only limited comments on this matter during the industry meeting or as part of their written comments after the meeting. **(See Table 1.1)**

For example, during the meeting, Ooredoo stressed the need to consider the internal processes required to provide each service. As such, Requesting Parties should plan their service requests, as most services are not time critical (i.e., not client facing).

[5] In TeO's view, out-of-stock situations should only occur in situations when access seekers' corresponding forecasts are exceeded or multiple orders are received unexpectedly at the same time.

As part of its written response, Renna agreed with the delivery timelines suggested by Omantel. Connect Arabia and Friendi also had limited comments on the proposed delivery times, mostly stating that Omantel should also specify a delivery time for its National Roaming services. Whilst Omantel had stated that this was not possible, Connect Arabia and Friendi both felt that it should be, as setting up a national roaming agreement should be similar to setting up an international roaming partner.

4. Decision

The TRA, in reaching its decision has taken into account the provisions of the Telecommunications Law and of the relevant regulatory instruments, including in particular the Access and Interconnection Regulation and the applicable principles therein.

In reviewing all representations made as part of the review process of the First and Second Draft RAIOs, and determining the appropriate delivery times where the proposals of the individual service providers differ, the TRA has considered the following factors:[6]

(a) the practice quoted by Omantel based on its experience in delivering the relevant A&I services in Oman,
(b) the feasibility for Omantel to meet the proposed and revised delivery times, taking into account the process steps within the overall delivery process and the expected resources needed to deliver the specific product or service,
(c) the fact that although this is the first time that Omantel has to provide several of the A&I services, and that it is therefore likely to need to develop new processes for these services, these services are in general well established in other jurisdictions, thus meaning that any necessary support for Omantel from equipment and systems suppliers is likely to be available,
(d) the impact on the development of efficient and sustainable downstream competition from the proposed delivery times,
(e) the need to differentiate between the timeframes required for initial system set-up processes for some A&I services (which can be complex) and the activation of services for individual customers or the routine expansion of capacity or traffic,
(f) that A&I services which are subject to the monthly forecasting process set out in Annex F of Omantel's RAIO should be delivered within the normal monthly delivery cycle (i.e., 10 – 20 working days), and
(g) the fact that the RAIO will be subject to continuous improvement.

Therefore, the TRA hereby requires Omantel, in preparing its Final Draft RAIO, to make the amendments in its Second Draft RAIO so that all delivery timescales are in line with the **Table 1.1**. All references to days shall mean working days save

[6] Note that these factors are not expressed in order of importance.

for the provisions relating to dealing with emergencies, whereby the days shall be calendar days.

In some cases, the TRA's Decision provides a range for the reasonable service delivery time. This is because the TRA recognises that, for these services, individual delivery times could vary significantly due to circumstance and it would therefore not expect all service orders to be fulfilled only at the maximum number of days allowed. The TRA will monitor future delivery times and if necessary, intervene to reduce the maximum delivery time-frame. As part of this, the TRA could consider the possibility of setting a two-part service delivery obligation, for example requiring a proportion of all orders to be met within less days than allowed under the maximum allowable delivery times.

The TRA further notes and considers helpful Omantel's proposal to develop flow charts on the end-to-end ordering and delivery process for each A&I service (both in terms of overall process steps and timeframes for executing each process step) as part of the Joint Working Manual, which will be prepared in cooperation with the industry over the coming months.

Service Delivery Times - Omantel **Table 1.1**

The comments/ responses provided by commenting parties during the consultation on the draft RAIO, including the submissions following the industry meeting, have not been presented below. However, the TRA has considered the full text of the representations and the fact that these representations are not presented here does not mean that the TRA has not fully considered the comment in question. In addition, this table does not include any information or submission that has been identified by the comment author as confidential. The TRA, in considering any such information, has also taken into account the fact that other parties have not be able to comment on confidential submissions.

Item	A&I Service	RAIO Reference	Omantel's Proposal	TeO		Friendi		Renna		Connect Arabia		TRA	
			2nd Draft RAIO	Proposal	Explanation /supporting evidence	Proposal	Explanation /supporting evidence	Proposal	Explanation /supporting evidence	Proposal	Explanation /supporting evidence	Final Decision	Explanation
General													
Existing services													
1	Issue Order Acknowledgement (OA) to Requesting Party	Clause 3.1, Annex H	2 working days after receiving Submitted Order (SO)		OK, in general as maximum time, but should be included in the service delivery times specified for each service below.			OK		2 days	OK	2 working days after receiving Submitted Order (SO)	In principle, the proposed timings appear reasonable as a maximum time period (except for item 7). However, given that the timings are likely to depend on the complexity of the activity / service to be delivered, these should be specific times for each A&I services. As such these are acceptable by the TRA for the time being, however Omantel as part of its proposals it has stated that it shall prepare step-by-step ordering and delivery process diagrams for each A&I service (i.e. covering the end-to-end process). Thus these should be incorporated and made specific by Omantel in the-flow charts on each end-to-end process that it shall develop as part of the Joint Working Manuals which will be prepared in cooperation with the industry over the coming months and will require TRA-approval.
2	Issue Delivery Order Offer (DOO) to the Requesting Party	Clause 3.5, Annex H	5 working days after OA.		OK, in general as maximum time, but should be included in the service delivery times specified for each service below.			OK		5 days	OK	5 working days after OA.	
3	Issue Request Acknowledgement (RA) to Requesting Party	Clause 4.1, Annex H	2 working days after receiving request		OK, in general as maximum time, but should be included in the service delivery times specified for each service below.			OK		2 days	OK	2 working days after receiving request	
4	Specify additional information needs to process request	Clause 4.2, Annex H	2 weeks after sending RA		OK, in general as maximum time, but should be included in the service delivery times specified for each service below.			OK		2 weeks	OK	2 weeks after sending RA	
5	Issue Notification of Delivery (ND)	Clause 5.3, Annex H	3 working days after delivering and testing the service		OK, in general as maximum time, but should be included in the service delivery times specified for each service below.			OK		n/a	OK	3 working days after delivering and testing the service	
6	Issue Notification of non-compliance of delivery (NCD)	Clause 5.4, Annex H	3 working days after expiry of Delivery Due Date (DDD) or ND		OK, in general as maximum time, but should be included in the service delivery times specified for each service below.			OK		n/a	OK	3 working days after expiry of Delivery Due Date (DDD) or ND	
7	Correct the delivery in case of receipt of a NCD	Clause 5.6, Annex H	7 working days		OK, in general as maximum time, but should be included in the service delivery times specified for each service below.			OK		n/a	OK	5 working days	
Fixed Access Services													
Wholesale Network Infrastructure Access at a Fixed Location													
8	Local Loop Unbundling (LLU)	Clause 6.1, Sub Annex C FA 01	Connectivity between Omantel MSAN and Requesting Party MSAN in 45 working days - As part of its written response after the industry meeting, Omantel provided a detailed break-down of this ordering process and how many working days each process step takes.	5 working days	Assumed to be the time to patch the end-customer across to the RP's MSAN, following a corresponding service order by the RP; Benchmark: SingTel - 4 working days for the end-to-end process. As part of its written submission, Teo commented on each process step to illustrate that it seems fully possible to deliver the LLU service on a per customer basis within the 5 working days, in particularly if the learnings from the MNP process is taken into account. Teo acknowledge that the LLU process for customers, who are not connected to the Omantel network may take longer time than this since the line may have to be tested end-to-end by Omantel before being patched across to the Access Seeker. Hence, adding 3-5 working days to the above process would seem reasonable. Furthermore, since all other retail-related A&I services are easier to provision than the LLU services, Teo's proposed 5 working days delivery time also for these services seems very reasonable.			N/A				No more than 10-20 working days	The TRA recognises that per-customer activation is more challenging/time-consuming for LLU services than for Resale Broadband and CCS/CPS or WLR, as rejumpering at remote exchange sites is required. However, Omantel's step-by-step process (provided after the industry meeting) allowed for a lot of time to check and condition the line which is commonly not the responsibility of the Access Provider. Instead the Access Provider commonly only undertakes a brief resistance check (using automatic equipment). After handover, the Requesting Party then gets an opportunity to check the line in detail and if it fails to meet up with the expectation, the order can be reversed. Therefore the TRA is satisfied that 10 - 20 working days are adequate for these purposes.
		Clause 6.3, Sub Annex C FA 01	Local Loop order in 30 working days	20 working days	Assuming co-location space is available; this is assumed to cover the whole service setup at the LLU site			N/A				No more than 10-20 working days	The TRA is satisfied that 10-20 working days should be adequate to provide capacity on existing links. Where capacity on the link is available, then adding extra circuit capacity should be no different from any other capacity where a forecast has been provided, so 10-20 working days (the regular monthly provision cycle) should be adequate. Even with the longer times that can occur when capacity does need to be enhanced, the lead-time provided by the advanced forecast should allow all but the major construction jobs to be programmed in. Once Omantel provides expressly for the provision of stand alone product of Interconnect Links then LLU will only be the subject of initial provision of colocation and then per-customer transfers. The management and enhancement of the Interconnect Links will then be handled under the product. Thus save where Omantel can clearly demonstrate and subject to providing notification to the other party within 5 working days of the order that major works would be required to meet the request and what shall be the delivery time of the requested links.
9	Local Loop Unbundling (Line Sharing)	Clause 6.2, Sub Annex C FA 02	see LLU above - Connectivity between Omantel MSAN and Requesting Party DSLAM in 45 working days	Same as LLU	Same as for LLU			N/A				No more than 10-20 working days	See item 8 above
		Clause 6.4, Sub Annex C FA 02	Local Loop order in 30 working days	Same as LLU	Same as for LLU							No more than 10-20 working days	See item 8 above
10	Sub-loop Unbundling	Clause 6.2, Sub Annex C FA 03	see LLU above - Connectivity between Requesting Party MSAN and Omantel Cabinet in 45 working days	Same as LLU	Same as for LLU			N/A				No more than 10-20 working days	See item 8 above
		Clause 6.4, Sub Annex C FA 03	Local Loop order in 30 working days	Same as LLU	Same as for LLU			N/A				No more than 10-20 working days	See item 8 above
11	Co-location	Clause 3.17, Sub Annex C FA 04	Allow Requesting Party access/visit to Omantel Premise: 7 working days	2 working days	Expected of an efficient operator			OK				No more than 5 working days	Allowing the Requesting Party access to Omantel's premise/site forms part of the general acceptance procedure for colocation provisioning and as such should not be reported separately. Requests for site access during normal service should be provided within 5 working days, with an emergency access service option to allow visits when equipment needs immediate maintenance attention.
		Clause 5.2, Sub Annex C FA 04	Service delivery: 25-70 working days	50 working days	Assuming space is available; Benchmark: SingTel 48 working days for the end-to-end process			OK		it is ok with us	it is ok with us	No more than 25-70 working days	Delivery involves planning and building a cage, plus ancillary power etc. (assuming space is actually available). As such, Omantel's proposal is appropriate.
Wholesale Broadband Access (WBA) at a Fixed Location													
12	Wholesale Line Rental (WLR)	Clause 7.3, Sub Annex C FA 05	30 working days	5 working days	For service activation per customer; Benchmark: Swisscom 5 working days (for up to 1,000 requests per working day) for the end-to-end process			N/A				No more than 5 working days for connectivity to each customer (assuming the site has been prepared for CPS routed calls)	Assuming the site has been prepared for CPS routed calls, This process is mostly subject administrative and anti-slamming processes. There will be some network data changes, but these should be small. So a shorter delivery time is appropriate.
13	Bitstream Layer 2	Clause 6.2.1, Sub Annex C FA 06	Backbone capacity and network connectivity: 3 months	45 working days	Benchmark: Telia does the complete service set-up within 40 working days			N/A				No more than 10-20 working days for the Interconnect Link, if required	The addition of backbone capacity and network connectivity should relate only to the capacity between Omantel and the AS's IP network. As an interconnect link, it should take no longer than any other form of interconnect link. For capacity within Omantel's network, the capacity is shared between their customers and other operators' customers and is not an interconnect issue (and should be removed from the RAIO).
		Clause 6.2.3, Sub Annex C FA 06	Connectivity to each customer: 30 working days	5 working days	For existing broadband customers; otherwise 15 working days for new customers without broadband; Benchmark: Telia maximum 8 working days for the end-to-end process, for any customer, independent of whether they are existing broadband customers or not			N/A				No more than 5 working days for connectivity to each customer already using broadband and 10-20 working days for connectivity to each customer not using broadband.	Similar to Resale Broadband services, this is a customer process (i.e. no network alterations involved only data changes in the IP network to route the customer's traffic to the AS's IP network). As such, a shorted delivery time should apply to customers already using broadband).

14	Bitstream Layer 3	Clause 6.2, Sub Annex C FA 07	Backbone capacity and network connectivity: 3 months	Same as for BS L2	Same as for BS L2			N/A				No more than 10-20 working days for the Interconnect Link, if required	See item 13 above
		Clause 6.4, Sub Annex C FA 07	Connectivity to each customer: 30 working days	Same as for BS L2	Same as for BS L2			N/A				No more than 5 working days for connectivity to each customer already using broadband and 10-20 working days for connectivity to each customer not using broadband.	See item 13 above
15	Wholesale Transmission	Clause 6.2, Sub Annex C FA 08	45 working days	10 working days	This is a simple point-to-point connection			N/A				No more than 10-20 working days, if subject to forecasting. Otherwise no longer than the provision of an equivalent leased line to a Omantel retail customer.	Whilst the provisioning of transmission capacity ought not to be complicated/time consuming, new equipment/capacity might need installing. As such, 10-20 working days are reasonable, assuming that this service has been subject to forecast. Otherwise, no longer than the provision of a similar capacity leased line to a retail customer.
16	Broadband Resale Service	Clause 7.1.2, Sub Annex C FA 09	30 working days	5 working days	Assuming customer is already a broadband customer of Omantel (i.e. same as MNP); otherwise 15 working days			N/A				• Initial system set-up: No more than 60 working days • Activation of individual customers already using broadband: No more than 5 working days • Activation of individual customers not using broadband: No more than 10-20 working days	Whilst initial set-up is likely to take several weeks (as it requires the exchange of a lot of data, testing and setting-up an AAA server connection), connecting individual customers thereafter should take no more than 5 working days.

Wholesale Leased Lines

17	Wholesale Terminating Segments of Leased Lines	Clause 6.3, Sub Annex C FA 10	30 working days	10 working days	Same as Ooredoo			OK				No more than 10-20 working days, if subject to forecasting. Otherwise no longer than the provision of an equivalent leased line to a Omantel retail customer. Up to 30 working days – if extra capacity is needed	Leased lines provisioning is similar to wholesale transmission services except that the terminating sections of leased lines end on a retail customer, rather than a POI. As such, similar delivery timelines should apply to both. In particular, 10-20 working days, assuming that this service has been subject to forecast. Otherwise, no longer than the provision of an equivalent retail leased line product.
18	Wholesale Trunk Segments of Leased Lines - National	Clause 6.2, Sub Annex C FA 11	45 working days	10 working days	Same as Ooredoo			OK					
19	Wholesale Trunk Segments of Leased Lines - IPLC	Clause 6.3, Sub Annex C FA 12	60 working days	10 working days	Same as Ooredoo			OK					

Wholesale IP international bandwidth capacity

20	Wholesale IP International Bandwidth Capacity	Clause 6.2, Sub Annex C FA 13	3 months	20 working days	Benchmark: SingTel 10-15 working days for the end-to-end process			N/A				No more than 10-20 working days	Omantel's proposal seems to include the provisioning of the Interconnection Link, which should be reported as a separate product/process. A delivery timescale of 10-20 working days for providing IP bandwidth capacity (excl. the interconnect links) appears reasonable.
21	Access to Landing Stations	Clause 3.19, Sub Annex C FA 14	Allow RP Access/visit to Omantel Premise: 7 working days	2 working days	Same as Co-location			N/A		It is ok	It is ok	No more than 5 working days	See item 11 above
		Clause 5.2, Sub Annex C FA 14	Service delivery: 70 working days	50 working days	Same as Co-location			N/A		It is ok	It is ok	No more than 25-70 working days	Delivery involves planning and building a cage, plus ancillary power etc. (assuming space is actually available). As such, Omantel's proposal is deemed appropriate.
		Clause 5.7.1, Sub Annex C FA 14	Cable pulling between lead-in and colocation space: 70 working days	10 working days	Expected of an efficient operator			N/A		It is ok	It is ok	No more than 10-15 working days	Cable pulling requires a specialist team to visit the landing station with appropriate equipment and pull the cable in and terminate it. Whilst the actual time to undertake this task may be only a couple of working days, this activity is likely to be queued along with others requiring the same resources.
22	Access to Earth Stations	Clause 5.2, Sub Annex C FA 15	Service delivery: 70 working days	Same as for landing stations	Same as for landing stations			N/A		It is ok	It is ok	No more than 25-70 working days	See item 21 above
		Clause 5.7.1, Sub Annex C FA 15	Cable pulling between lead-in and colocation space: 70 working days	Same as for landing stations	Same as for landing stations			N/A		It is ok	It is ok	No more than 10-15 working days	See item 21 above
23	Access to Data Centres	Clause 5.2, Sub Annex C FA 15	Service delivery: 70 working days	Same as for landing stations	Same as for landing stations			N/A		It is ok	It is ok	No more than 25-70 working days	See item 21 above
		Clause 5.7.1, Sub Annex C FA 15	Cable pulling between lead-in and colocation space: 70 working days	Same as for landing stations	Same as for landing stations			N/A		It is ok	It is ok	No more than 10-15 working days	See item 21 above

Fixed Interconnection Services

Fixed ancillary services

24	Fixed ancillary services	Clause 3.6.3, Sub Annex C FI 01	New POI: 34-75 working days. As part of its written response after the industry meeting, Omantel provided a detailed break-down of the POI ordering process and how many working days each process step takes	35 working days	Minimum expectation on an efficient operator			N/A				No more than 28-40 working days (excl. the provision of interconnect links)	Having reviewed Omantel's step-by-step process (submitted to TRA after the industry meeting) which claims a timescale of 78-107 working days, a number of points come out: • The process includes several steps that relate to the provision of the first interconnect links into the POI and testing thereof. This should be treated as a separate product and reported separately (incl. delivery times). • Omantel has included 6-12 working days to discuss Acceptance Test Procedures. This does not relate to the POI construction itself. Such procedures must already have been developed. • Similarly, the Testing of Billing Systems would only need to be done once and is not related to the POI construction itself. Removing the above process steps from Omantel's overall process results in a delivery timeframe of 28-40 working days for the POI construction (excl. the provisioning of the interconnect link).
		Clause 4.3.2, Sub Annex C FI 01	Port capacity at existing POI: 25-70 working days	10 working days	Assuming capacity is available at the POI; otherwise 20 working days			N/A				No more than 10-20 working days, where capacity is available	The TRA is satisfied that where port capacity is available, this is mostly a simple jumpering task. But it may be at a remote, unattended location and as such requiring some extra time to deliver. In case of a new POI, these processes should be running in parallel with the main colocation build.
		Clause 5.3.2, Sub Annex C FI 01	Basic Block and Expansion Co-Location: 30-60 working days	-	We disagree with the concept of having to order a "Basic Block" separately; Ooredoo doesn't have it, nor have we come across this practice internationally			N/A				No more than 30-60 working days	The TRA considers Omantel's proposed delivery time acceptable. The provision of in-building wiring (Basic Block and Expansion Colocation) is separate to the provison of port capacity. Whilst the latter only requires cross-connection, the former may require providing a new cable between exchange and the colocation room. Further, as Omantel offers Basic Blocks of 63 (2Mbps) cables at a time, Requesting Parties are unlikely to require additional blocks on a regular basis (i.e. only once they have reached that capacity) and if so, they can order these sufficiently in advance.

Fixed Call Origination

25	Call Origination – Call by Call Selection ("CCS")	Clause 5.6, Sub Annex C FI 02	System preparation: 34-75 working days; Delivery date is subject to technical feasibility.	This is a simple "number" implementation and routing configuration, and simpler to implement than CPS			N/A					• System set-up: No more than 20 working days • Routine link expansion: No more than 10-20 working days	The system set up depends on what processes are agreed and need implementing on computer systems. However, 20 working days to complete the set-up seems appropriate. Any subsequent route link expansion should be delivered within the normal monthly delivery cycle of 10-20 working days. Service delivery times are the sum of various process steps which at times requires queueing. As such, the TRA considers it appropriate to allow for range of 10-20 working days for customer activation.
		Clause 6.6, Sub Annex C FI 03	System preparation: 34-75 working days	Benchmark: Swisscom 15-18 working days			N/A					• System set-up: No more than 20 working days • Routine link expansion: No more than 10-20 working days	See item 25 above

26	Call Origination - Carrier Pre-Selection ("CPS")	Clause 6.8, Sub Annex C FI 03	Customer activation: 14-30 working days	An automated process similar to Mobile Number Portability should be established by operators to maximize the efficiency for such a service. We believe no more than 5 WD should be required for this service Benchmark: Swisscom 5 working days (from up to 1,000		N/A					No more than 5 working days for connectivity to each customer (after the customer has completed the anti-slamming process)	The TRA is satisfied that this process is more an issue of administrative and anti-slamming processes. It accepts that there will be some network data changes, but these should be small (i.e. a simple data change carried out remotely) and there is no on-site work required. So a shorter delivery time seems appropriate.
27	Call Origination for Non-Geographic Calls	Clause 5.1, Sub Annex C FI 04	Standard Annex H process	This is a simple number implementation and routing configuration		N/A					No more than 10 -20 working days (assuming no new physical routes need adding)	Assuming all system set-up processes are completed, each request for any fixed call origination service is no more than Number Range Implementation. Therefore any activities that are to take place after the full set-up process has been completed shall be completed within the normal monthly delivery cycle of 10-20 working days.
28	Outgoing International Calls	Clause 5.1, Sub Annex C FI 05	Standard Annex H process	This is a simple number implementation and routing configuration		N/A					No more than 10 -20 working days (assuming no new physical routes need adding)	See Item 27 above
29	Calls to Special Services Fixed	Clause 6.1, Sub Annex C FI 06	Standard Annex H process	This is a simple number implementation and routing configuration		N/A					No more than 10 -20 working days (assuming no new physical routes need adding)	See Item 27 above
30	Pre-paid Calling Card Access Type 1	Clause 5.6, Sub Annex C FI 07	The delivery date is subject to technical feasibility.	Not relevant		N/A					No more than 10 -20 working days (assuming no new physical routes need adding)	See Item 27 above
31	Pre-paid Calling Card Access Type 2	Clause 5.6,Sub Annex C FI 08	The delivery date is subject to technical feasibility.	Same as Call Origination to Non-Geographic Numbers		N/A					No more than 10 -20 working days (assuming no new physical routes need adding)	See Item 27 above
Fixed Call Termination												
32	Call Termination	Clause 6.1, Sub Annex C FI 09	Standard Annex H process	10 working days	This is a very simple routing configuration and follows existing routing			N/A				No more than 10 -20 working days (assuming no new physical routes need adding)	See Item 27 above
Fixed Call Transit												
33	Fixed Call Transit	Clause 5.1, Sub Annex C FI 10	Standard Annex H process	10 working days	This is a very simple routing configuration and follows existing routing			N/A				No more than 10 -20 working days (assuming no new physical routes need adding)	See Item 27 above
Mobile Access Services **National Roaming Services**													
34	National Roaming Services	Clause 10.1, Sub Annex C MA 01	Standard Annex H process; As part of its written response after the industry meeting, Omantel stated that it is not possible to specify the timelines for provisioning these services, as this requires both parties to work together. The time required will be usually very long, and will depend not just on Omantel performing its part, but also on the Requesting party performing its part; parties agreeing on the configuration, implementation of services and also on other similar activities approvals from authorities are also required sometime, in case to enable some services either the requesting party or the MON might have to procure some extra hardware which can add 12 to 16 weeks during the process for procurement of hardware, installation, commissioning etc. It would be best to agree on the timelines at the time of the agreement between two parties after assessing the situation and requirement. In the case of Ooredoo providing National roaming to Omantel customers, it took over 18 months and Omantel and Ooredoo kept the TRA informed.	30 working days	We agree that it is difficult to specify the delivery timelines for the Mobile Access Service, as the delivery is very much dependent on which systems the Mobile Reseller has, and the level of integration between the two parties. Hence, we agree that the delivery times could be defined and agreed jointly between the dominant operators and the Mobile Resellers, after assessing requirements. However, we disagree that the same applies to National Roaming. National Roaming, much like International Roaming which has been implemented on many, many occasions by Omantel and other dominant operators, is based on well-known and standardized interfaces, and can be implemented very quickly if the will is there. Similar to setting up an international roaming partner and already done for Ooredoo. Based on Omantel's experience in implementing National Roaming for Ooredoo in 2005, and its subsequent implementation of National Roaming on Ooredoo's network in 2007, there is no reason why Omantel can't specify a service delivery time for National Roaming.	Must follow international best practice	A delivery time should be specified, this is similar to setting up an international roaming partner and OT has lots of experience in doing this	N/A				Initial planning: No more than 30 working days Implementation: No more than 30-45 working days	This is a one-off complex project, for which it will be difficult to set specific timelines. Initially there will need to be a period of mutual planning between the Access Provider and Access Seeker and agreement on steps to be taken. It seems reasonable to complete the planning process within 30 working days and once both parties are ready to proceed, a further 30-45 working days to implement national roaming.
Mobile Access Services													
35	Mobile Access Services	Sub Annex C MA 02	Delivery timelines not specified - see response to National Roaming Services.	TBD	Depending on mobile reseller's systems and system integration required		OK, in general as it depends on mobile reseller's systems and it's integration requirement	Case to case can be decided				To be agreed on a case-by-case basis between the Providing Party and Requesting Party	In agreement with all parties that it is not possible to set specific delivery times for this service as it depends on the mobile reseller's systems and system integration required. Instead, implementation timelines should be agreed on a case -by-case basis.
Mobile Interconnection Services **Mobile Ancillary Services**													
36	Mobile ancillary services	Clause 3.3.2, Sub Annex C MI 01	New POI: 34-75 working days	35 working days	Same as Fixed POI			OK	This can be divided into two cases when less and more time is taken			No more than 25-70 working days	These timings should be consistent with the delivery times for fixed network POIs and co-location in network buildings (see item 24 above)
		Clause 4.3.2, Sub Annex C MI 01	Port capacity at existing POI: 25-70 working days	10 working days	Assuming capacity is available at the POI; otherwise 20 working days			OK				No more than 10-20 working days, but in case of a new POI, these should be running in parallel with the main colocation build.	
		Clause 5.3.3, Sub Annex C MI 01	Basic Block and Expansion Co-Location: 30-60 working days	-	We disagree with the concept of having to order a "Basic Block" separately; Ooredoo doesn't have it, nor have we come across this practice internationally			OK				No more than 30-60 working days	
Mobile Termination													
37	Mobile call termination	Clause 5.1, Sub Annex C MI 02	Delivery timelines not specified; Ordering and delivery shall be handled according to Annex H	10 working days	Same as Fixed Call Termination			N/A		We are fine with it	We are fine with it	No more than 10 -20 working days (assuming no new physical routes need adding)	See Item 27 above
38	SMS and MMS Termination	Clause 6.1, Sub Annex C MI 03	Delivery timelines not specified; Ordering and delivery shall be handled according to Annex H	10 working days	Simple interfacing between standardised systems and already operational with Ooredoo			N/A				No more than 10 -20 working days (assuming no new physical routes need adding)	See Item 27 above
Mobile Origination													
39	Call Origination – Call by Call Selection ("CCS")	Clause 5.6, Sub Annex C MI 04	System preparation: 34-75 working days; Delivery date is subject to technical feasibility.	Same as Fixed CCS			N/A					• System set-up: No more than 20 working days • Routine link expansion: No more than 10-20 working days	See item 25 above
40	Call Origination - Carrier Pre-Selection ("CPS")	Clause 6.6, Sub Annex C MI 05	System preparation: 34-75 working days	Same as Fixed CPS			N/A					• System set-up: No more than 20 working days • Routine link expansion: No more than 10-20 working days	See item 25 above
		Clause 6.8, Sub Annex C MI 05	Customer activation: 14-30 working days	Same as Fixed CPS			N/A					No more than 5 working days for connectivity to each customer (after the customer has completed the anti-slamming process)	See item 26 above