CONSULTATION QUESTIONS – DIGICEL'S RESPONSE

Q1: Comments are invited on any aspect of TRR's draft interpretation of speeds and proposal regarding design capacity, practical and minimal speeds. (Section 4)

Section 2- 1.1 98% population or addressable population ,TRR should provide the details of addressable population and population with no Telecom access ,for example 5% of population have no access to mobile communication then using that Data Digicel can work on a future plan. There are areas where the population of villages is less than 100 and due to irregular terrain each of these village will need a 30 meter tower for coverage .

It may be necessary to exclude these villages from the total population as these villages are not 'addressable' from a commercial perspective. Alternatively if these remote villages are to be included, the opex of any site which covers these areas should be covered by ongoing UAP funding.

Section 2-1.1.3—Broadband term for UAP pilot project was 512kbp/128kbp and now we are referring to 21Mbps which is impossible to provide even if we have fiber connectivity to all the towers around the country ,21Mbps means 11E1 per site and every 5 sites will need an STM1. For example the total capacity required for Banks Islands area to connect it to port Vila will be more than 5 STM which is not possible to get on transmission links ,this can be done once we have a fiber connectivity to all of the outer island .

The 2nd issue is the pricing and cost of internet ,lets say a 1Mbps from interchange is costing us US$600 then 21Mbps x600=US$12600. Is there even a single business in Vanuatu ready to spend US$12K for internet ,the answer is most certainly no. Technically keeping the capacity available means we have to keep the infrastructure ready for that even if there is no use and to build a network with such a high capacity is impossible considering the return on investment.

Section -4

Theoretical speed of 3G depends on the network capacity ,having a site with 21Mbps speed will not work on 21Mbps without Transmission backhauling ,the practical speed and minimal speed need to be close to each other (21Mbs vs 2Mbps) otherwise it doesn't make any sense to have a site ready with 21Mbps speed and actual requirement is only 1Mbps .

One issue of semantics from this section: 99% SUCCESS rate or any success rate is something which is used for call completion etc. We believe this should be changed to network availability instead of success rate ,the terms is not for data as it is normally used for voice .

Q2: What are your views on TRR's draft interpretation of Service Quality and speeds for the purposes of the UAP? (Section 5)

Section 5 – the service will be considered failed if it fails to provide 21Mbps speed at any time ,this means a dedicated 21Mbps services. Is there actually any need of 21Mbps services? How many existing customers in Port Vila are using 21Mbps service and what will be the advantage to reserve such a high capacity where there is no need ?

Even now all of the operators can provide whatever amount of bandwidth a customer requires over a dedicated connection but there is no demand for such high speed services.

With existing sites data usage it is very clear that no one needs 21Mbps speed in outer island .

Q3: What are your views as to what may constitute a reasonable definition of service that meet the broadband speed of 21/12 Mbps required under the UAP, and whether a practical baseline speed should be determined that is 'SMART' (Simple, Measurable, Achievable, Realistic and Timely)? (Section 5)

Go for 50% more than what is required ,for example if the demand is 2Mbps then provide min 4Mbps speed in that specific area otherwise keep the network to a level where the speed and capacity is 2 times more than the actual usage and increase it with the demand .

Do an analysis of Rensari pilot project and double the speed for other provisional offices ,21Mbps will be good for the areas where there is Unelco power and people have laptops and computers.

1Mbps/256kbps is more than enough for outer island (skype ,video calls ,conferencing ,online lectures and all other important work can be done on this speed).

Q4: What are your views on TRR's proposal in respect of Service Quality and Speed Implementation? (Section 6)

SECTION 6- There are two KPI'S which are totally unrelated with the broadband project , from network side giving access is an issue and once we have the internet in any island then it doesn't make any difference to keep it up for all the time or 4 hours ,6 hours etc .

The 2nd KPI is the dedicated internet guarantee ,its mean every user will have an access to 2Mbps all the time (99% of the time) ,this doesn't work in contended internet services as you can't measure it ,if a customer need a 2Mbps dedicated internet then the cost is more than US$1000 which is again impossible to charge to customers and customer will not accept the pricing ,this should be an average speed not the min speed for the usage period .

The kpi should be changed to network availability and average speed instead of 4 HOURS internet and 8 hours in 2015 .

Q5: What are your views on TRR's preliminary view that the required broadband speed with availability of 21/12 Mbps should be contended for a minimum availability capacity of at least 2/1 Mbps with 99% success rate?

Technically all 3 parameters are impossible to achieve ,this can be done in Port Vila and Santo only ,we should make a plan for provisional head offices first and then using that data prepare something reasonable for other areas .

2 TO 4Mbps max and 1Mbps/256kbps average speed is something reasonable with a network availability of 90% in outer island and 98% in Santo and Vila ,change the success rate to availability ,minimum availability capacity to average capacity and broad band speed from 21Mbps to 2Mbps.