



## **A Public Consultation Document**

**on**

### **STC Reference Interconnect Offer (RIO)**

Issued by CITC in Riyadh,

15/04/1430 H, 11/04/2009 G

## 1. INTRODUCTION

The Telecommunications Act (the “Act”) and its Bylaw provide the Communications and Information Technology Commission (the “CITC” or “Commission”) with broad powers to establish the terms and conditions that govern public communications network access in the Kingdom of Saudi Arabia, with the objective of creating a favourable atmosphere and encouraging fair competition in all fields of telecommunications”.

CITC Decision 1/1423 classified the Saudi Telecommunications 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 date 21/3/1426H.

In early 1427H, the CITC issued Decision 113/1427, dated 21/03/1427H, approving the first update of STC’s RIO subject to certain revisions required by the Decision. Concurrently with the Decision the “Report on CITC’s Review and Analysis of STC’s Revised RIO” was published on the CITC website.

In mid 1429H, CITC issued Decision 204/1429, dated 06/05/1429H, approving the second update of STC’s RIO.

## 2. PUBLIC CONSULTATION PROCESS

### 2.1 Objective and Aim of the Consultation

CITC invites all service providers, as well as all other interested private individuals, and organizations in the public and private sectors, to register and participate in this consultation process (together, the “Respondents”).

The objective of this consultation process is to provide Respondents with the opportunity to provide comments to CITC on STC’s RIO, a copy of which is attached as Attachment B. The aim of this public consultation process is to assist CITC in its decision regarding the approval of an amended STC RIO.

### 2.2 Comments on Consultation Document

This Public Consultation Document is available on CITC’s website at <http://www.citc.gov.sa>.

Respondents are invited to submit their comments in writing to CITC. All comments must be received by CITC no later than **[25/5/1430 H]**, corresponding to **[20/5/2009]**. All Respondents who submit comments on this Public Consultation Document by such date will be deemed to have registered with CITC for purposes of the Rules of Procedure.

Comments filed in relation to this Public Consultation Document may be submitted to one or more of the following addresses:

- a) E-mail to: **rio@citc.gov.sa**;
- b) Delivery (hard and soft copy) by hand or by courier to:  
Office of the Governor,  
Communications and Information Technology Commission (CITC)

King Fahad Road, P.O. Box 75606  
Riyadh 11588  
Kingdom of Saudi Arabia

CITC welcomes and invites comments and responses to the numbered “Questions” set out in the Consultation Document attached as Appendix A (the “Consultation Questions”). Subject to section 0 below, CITC intends to publish on the CITC website copies of all comments submitted by Respondents. CITC encourages Respondents to support all comments with relevant data, analysis, benchmarking studies, and information based on the national situation or on the experience of other countries to support their comments. CITC may give greater weight to comments supported by appropriate evidence. In providing their comments, Respondents are requested to indicate the number of the Consultation Question(s), or of the clause(s) in the document, to which the comment relates. Respondents are not required to comment on all Consultation Questions. CITC will consider all comments received but is under no obligation to adopt the comments of any Respondent.

### **2.3 Replies on Comments**

CITC hereby informs Respondents that, pursuant to Article 26 of the Rules of Procedure, CITC intends to provide all Respondents who submit comments in the context of this Public Consultation with an opportunity to submit “replies” in relation to the comments filed by other Respondents.

CITC will inform Respondents, at the same time as CITC publishes Respondents’ comments on the CITC website, of the date by which they must submit their replies (if they choose to exercise this right).

Replies filed in relation to this Public Consultation Document may be submitted to one or more of the addresses set forth above in Section 2.2.

## **PUBLICATION OF SUBMISSIONS AND THE TREATMENT OF CONFIDENTIALITY CLAIMS**

The following methodology will apply to the publication of submissions and any claim of confidentiality by Respondents in relation to a document submitted to CITC in relation to this Public Consultation:

(1) Where a document is submitted by a Respondent to CITC in relation to this Public Consultation, CITC shall place a copy of the document on the CITC website at <http://www.citc.gov.sa> unless the Respondent asserts a claim of confidentiality, as regards part(s) or the entire document, at the time of such submission.

(2) A Respondent asserting such a claim of confidentiality in connection with a document shall at the same time submit to CITC a redacted version of the document to be placed on the public record in which the confidential information in the document has been removed.

(3) Each claim of confidentiality made in connection with a document submitted to CITC or requested by CITC shall be accompanied by written reasons for such confidentiality claim. Where a single document contains multiple confidentiality claims, the written reasons must be given separately for each part of a document for which confidentiality is claimed. Where it is asserted that specific direct harm would be caused to the Respondent claiming confidentiality, sufficient details shall be provided as to the nature and extent of such harm. CITC will deal with such claims in accordance with its Statutes. Any such claim of confidentiality may itself be placed on the public record on the CITC website. If no justification is provided as to why the information should be designated as confidential information, then CITC will assume that it is non-confidential and may decide to place the information on the public record on the CITC website.

(4) Where a Respondent submits either paper or .PDF versions of their comments, Respondents must also submit documents in an electronic format that may be edited (such as MS Word or MS Excel). For redacted versions of submissions, The Respondent should edit them in a manner that

facilitates a determination of the places where and the extent to which information has been omitted (for example, by means of use of square brackets and/or hash marks - ##).

(5) Any registered party to the public consultation process wishing the public disclosure of information in respect of which there has been a claim for confidentiality may submit to CITC within 5 days of the publication of the confidentiality claim:

(a) a request for such disclosure setting out the reasons therefor, including the public interest in such disclosure; and

(b) any material in support of the reasons for public disclosure.

(6) A copy of a request from a registered party for the public disclosure of information in respect of which there has been a claim for confidentiality shall be provided to the Respondent claiming confidentiality and that Respondent may, unless CITC otherwise determines, submit a reply to CITC within 5 days after the date of service of the request and shall, where a reply is submitted, provide a copy thereof to the party requesting public disclosure.

(7) Where CITC of its own motion requests that information for which confidentiality has been claimed be placed on the public record, the Respondent claiming confidentiality shall have 5 days to submit a reply, unless CITC otherwise determines.

(8) Where CITC is of the opinion that, based on all the material before it, no specific direct harm would be likely to result from disclosure, or where any such specific direct harm is shown but the benefits of disclosure outweigh any harm to the person who submitted the information, CITC may issue a decision to order that the information be placed on the public record.

(9) Where CITC is of the opinion that, based on all the material before it, the specific direct harm likely to result from public disclosure justifies a claim for confidentiality for all or parts of the document, CITC may

(a) order that the confidential information not be placed on the public record;

(b) order disclosure of a redacted version of the document; or

(c) order that some or all parts of the document be verbally disclosed to the other Respondents at a closed hearing.

## Attachment A: Assessment of STC RIO

This Public Consultation Document provides CITC's preliminary views with respect to the STC current RIO included in Attachment B of this Consultation Document. CITC's preliminary views are based on a detailed analysis of the current RIO and a review of the corresponding international practice and experience. This Chapter addresses the question of whether the current RIO meets the objectives set out in Decision 204/1429.

### 1.1 RIO Primary Document

#### 1. Section 11.5 – Lead-Time for Data Management amendments

Section 11.5 requires 2 months lead time for Data Management Amendments (DMAs). This lead time appears to be excessive, given that DMAs do not involve physical changes to the network. Indeed, in Annex G Schedule 2 Section 2.1, STC states that 20 business days notice is required prior to opening new number ranges, which is essentially a DMA process. The Glossary of terms defines a Data Management Amendment as "such data reconfiguration of the STC Network or the OLO's Network as is necessary for the access, routing and charging of calls."

CITC has examined international practice and trends in this matter. Benchmark results showed a best practice lead time of approximately one month. The CITC is of the preliminary view that the lead time for DM amendments should be reduced in order to be more consistent with the benchmark results.

**Question 1:** *Please provide comments on the DMA lead time requirements matter discussed above, including CITC's preliminary views on this matter.*

**Question 2:** *Please provide comments on any other matter in the Primary RIO document*

### 1.2 Annex A: Definitions and Glossary of Terms

CITC does not have any comments on Annex A at this phase of the Public Consultation.

**Question 3:** *Please provide comments on Annex A.*

### 1.3 Annex B: Billing Processes and Procedures

#### 1. Section 2.2.3 -- Advance Payment for New Interconnect Facilities

Currently Section 2.2.3 of Annex B calls for quarterly advance payments, with yearly payment in advance during the first year for new links provisioned using new facilities. CITC is of the view that any risk borne by STC which the payment in advance may be intended to reduce would not be significant, as there is already scope to charge for circuits forecast but not ordered. Moreover, STC has the ability to request Bank Guarantees where it has concerns about payment. Under the circumstances, CITC is of the preliminary view that OLOs should not be required to pay a year in advance for the first year.

**Question 4:** *Please provide comments on the advance payment matter discussed above, including CITC's preliminary views on this matter.*

**Question 5:** *Please provide any other comments you may have on Annex B.*

## **1.4 Annex C: Technical Information**

### **1. Annex C, Section 3.5 – In Span Interconnection (ISI) Layout**

Section 3.5 specifies that, for ISI links, the Footway Box will be located within the curtilage of the OLO site. Some Facilities Based Providers (FBP) might prefer to build a larger part of such links themselves. Accordingly, CITC is of the preliminary view that the RIO should be amended to allow the two parties to agree a mutually acceptable location for the footway box between their two buildings.

**Question 6:** *Please provide comments on the ISI layout matter discussed above, including CITC's preliminary views on this matter.*

### **2. Annex C, Section 4.2 – Switching Network Interconnection**

Annex C Paragraph 4.2(b) stipulates that for interconnect with a Kingdom wide OLO public network, the initial requirement for interconnection at Service Node level is to establish interconnection at a minimum of 2 Points of Interconnection at Service Nodes in each of the 3 large regions, and in case of direct interconnection at MSC-ICG level an initial requirement to establish interconnection at a minimum of 2 Points of Interconnection in each of 4 identified cities. CITC is concerned that this may be interpreted as requiring a new entrant to have direct interconnection to 4 MSC-ICGs in addition to the 3 fixed transit nodes. This may not be economic since a new entrant may not have enough traffic to warrant such a large opening interconnection network configuration.

CITC is of the preliminary view that STC should amend the RIO as regards minimum configurations for interconnection, to clarify that a new entrant with a Kingdom-wide network is required only to establish direct interconnection in each of 3 regions to Service Nodes in the fixed network and could then use STC's network to transit to other fixed or mobile network locations.

**Question 7:** *Please provide comments on the minimum configurations for interconnection, including CITC's preliminary views on this matter.*

**Question 8:** *Please provide comments on any other comments you may have on Annex C, including its attachments.*

## 1.5 Annex D: Management of Interconnection

CITC does not have any comments on Annex D at this phase of the Public Consultation.

**Question 9: Please provide comments on Annex D.**

## 1.6 Annex E: Forecasting

CITC does not have any comments on Annex E at this phase of the Public Consultation.

**Question 10: Please provide comments on Annex E.**

## 1.7 Annex F: Price List

### 1. Schedule 2A -- Voice call termination service to STC geographic number ranges

CITC has examined international practice and trends in this matter and is conducting a LRIC analysis of voice call termination services. CITC intends that the prices for this service shall be determined in light of the results of this process and may be subject to the application of a 'glidepath'.

### 2. Schedule 2A – Disaggregation of call termination rates

The call termination rate specified in Schedule 2A is based on a 'blended rate' for the termination of calls to geographic numbers. Interconnection is only available at the transit switch level, and there are no separate prices for Single Tandem and Double Tandem calls. In its report accompanying the last RIO Decision, the CITC stated: "In its review of international practice on this issue, the CITC has found that the number of countries adopting one or the other of the schemes is roughly equal. The CITC has considered this issue and is of the view that there is not a sufficiently strong argument to change the scheme at this time. The CITC will however review this issue in light of its work on LRIC."

The CITC's LRIC analysis is ongoing. At this stage of its review, CITC considers that the advantages of disaggregation include:

- a) Providing interconnecting OLOs with more detailed information on the costs of the different termination services (single tandem and double tandem), which could lead to greater efficiency in the way they interconnect as well as encouraging network build-out to additional interconnect points. CITC understands that STC local exchanges are not currently equipped with wholesale billing facilities and that if disaggregation were to be extended to local exchange termination, this may significantly increase implementation costs.
- b) Disaggregated charges reflect cost causation, and avoid the situation that occurs with a blended rate – namely, that operators using more Single Tandem calls than average will be

subsidising other operators that use less. Disaggregated rates, therefore, promote fairer competition.

The disadvantages of disaggregation include:

- a) More complex management of interconnect charges, including data collection and billing changes.
- b) Disaggregated prices may be less relevant in the era of Next Generation Networks.

Given the above, CITC has no preliminary view on whether disaggregation should be implemented and is seeking stakeholder views on this matter.

**Question 11: Please provide comments on the disaggregation of call termination rates. Respondents are encouraged to provide justification for their comments.**

### **3. Schedule 2B -- Voice call termination service to STC mobile number ranges**

CITC has examined international practice and trends in this matter and is conducting a LRIC analysis of voice call termination services. CITC intends that the prices for this service shall be determined in light of the results of this process and may be subject to the application of a 'glidepath'.

### **4. Schedule 7 -- Calls to Emergency services**

CITC has examined international practice and trends in this matter and is of the preliminary view that the STC rate should be the same as the rate for voice call termination service to STC geographic number ranges.

**Question 12: Please provide comments on STC's Emergency Calls Service Pricing, including CITC's preliminary view on the matter. Respondents are encouraged to provide justification for their comments, including, if possible, with reference to international benchmarking.**

### **5. Schedule 3A – Customer Sited Interconnect Link Service**

CITC has examined international practice and trends in the pricing of Interconnect Links. Benchmark results showed an average rate for STM-1 interconnect link connection of approximately 7,000 SAR. In addition benchmark results showed an average annual rental rate for E1 interconnect links of approximately 28,000 SAR.

CITC is of preliminary view that RIO prices for these services should be reduced in order to be more consistent with the benchmark results.

**Question 13:** *Please provide comments on STC's interconnect link service pricing, including CITC's preliminary view on the matter. Respondents are encouraged to provide justification for their comments, including, if possible, with reference to international benchmarking.*

## 6. Schedule 3B – In-Span Interconnect Link Service

At present, all survey, set-up and rental charges for In-Span Interconnect (IS) links are shown as 'bespoke' whereas all comparable charges for CSI links are fully specified.

In its report accompanying the last RIO Decision approving the RIO, CITC stated: "The CITC agrees that in principle the RIO should identify the rate level for all interconnection services offered by the Dominant Service Provider; however, since provision of in span interconnect links is a new service, the CITC has decided to allow the rates to be negotiated on a commercial basis initially, and to review the establishment of specific rates in the RIO after consideration of the actual demand for the service and of the results of the LRIC process, when they become available."

Since that time, CITC has noted that in-span interconnection services have not been included in any interconnection agreements to date and is concerned that the lack of specific rates may be discouraging OLOs from using the service. CITC has also conducted international benchmarking for countries where ISI is offered and has found that most RIOs contain specific prices for ISI links. With this consultation, CITC is seeking input on the need for the service and whether the prices should initially be determined through commercial negotiations. In the determination of prices, CITC is of the preliminary view that as a minimum, the principles for ISI pricing should be consistent with CSI pricing and reflect the length of the circuit to the footway box (given the possible extra flexibility on its location, see question 6 above), the avoided cost of the distant transmission equipment and the cost of footway box survey and construction.

**Question 14:** *Please provide comments on the inclusion of charges in the RIO for ISI links, including CITC's preliminary view on the matter.*

## 7. Schedule 4A -- Wholesale Transmission Link Service

CITC has examined international practice and trends in this matter. Benchmark results showed an average price of about 10,000 SAR for STM-1 connection. CITC has also noted that in at least one existing Wholesale Agreement the Wholesale Transmission Link Service annual rental rates are lower than those offered in the RIO.

CITC is of preliminary view that RIO prices for STM-1 connection should be reduced in order to be more consistent with the benchmark results, and that the prices for annual rental should be reduced to be no more than those in existing Wholesale Agreements.

**Question 15:** *Please provide comments on STC's transmission link service pricing, including CITC's preliminary view on the matter. Respondents are encouraged to provide justification for their comments, including, if possible, with reference to international benchmarking.*

#### **8. Schedule 4E -- Wholesale Data Local Access Service**

CITC has examined international practice and trends in this matter. Benchmark results showed an average price of about 30,000 SAR for the annual rental for E1 services.

CITC is of preliminary view that RIO prices for this service should be reduced in order to be more consistent with the benchmark results.

**Question 16:** *Please provide comments on STC's pricing for data local access circuits, including CITC's preliminary view on the matter. Respondents are encouraged to provide justification for their comments, including, if possible, with reference to international benchmarking.*

#### **9. Schedule 9 Wholesale International Leased Circuits**

CITC has examined international practice and trends in this matter. Benchmark results, while limited in number, showed that STC's prices are relatively high.

Given the limited benchmarking data available to it, CITC does not have a view on the appropriate level of prices for this service and is seeking stakeholder views on this matter.

**Question 17:** *Please provide comments on STC's pricing for wholesale international leased circuits. Respondents are encouraged to provide justification for their comments, including, if possible, with reference to international benchmarking.*

#### **10. Schedule 10 Wholesale International Internet Connectivity**

CITC has examined international practice and trends in this matter. Benchmark results, while limited in number, showed that STC's prices are relatively high.

CITC has also noted that in at least one existing Wholesale Agreement, the International Internet Connectivity service annual rental rates are lower than those offered in the RIO.

CITC is of preliminary view that RIO prices for this service should be reduced to be no more than those in existing Wholesale Agreements.

**Question 18:** *Please provide comments on STC's pricing for wholesale international internet connectivity, Respondents are encouraged to provide justification for their comments, including, if possible, with reference to international benchmarking.*

## 11. Schedule 11 National Call Transit

The STC RIO does not currently provide prices for National Call Transit services. Call transit is an important service as smaller Facility Based Providers will probably not initially be able to economically justify establishment of direct routes to all other networks. CITC has examined international practice and trends in this matter. Benchmarking results indicate that international best practice is to include call transit prices in the RIO. CITC is of the preliminary view that STC should include prices for national voice call transit service in its RIO.

CITC has conducted a preliminary cost analysis of this matter and has estimated that, if implemented, the Call Transit price for 2009 would be about 0.9 halalas/min for Single Tandem Transit and 2.5 halalas/min for Double Tandem Transit. CITC is of the preliminary view that National Call Transit prices should be included in the RIO and that the prices for this service, if included in the RIO, shall be determined based on the CITC cost analysis.

**Question 19:** *Please provide comments on whether STC's RIO should include call transit service prices including CITC's preliminary view on the matter.*

**Question 20:** *Please provide comments on any other pricing matter in Annex F.*

## 1.8 Annex G: Services Schedule

### 1. Call Origination from Fixed Services

Annex G of the RIO does not include a call origination service to cover such services as Carrier Selection. In light of the Regulatory Framework on Carrier Selection and of the imminent entry into the market of new fixed facilities based providers, CITC is of the preliminary view that it is now appropriate to include an offer to provide call origination services in the RIO. CITC has conducted a preliminary cost analysis and has estimated that, if implemented, the price for 2009 of Call Origination should be about 5.0 halalas/min (if using a blended rate)

**Question 21:** *Please provide comments on the above-mentioned call origination issue, including CITC's preliminary view on the matter.*

### 2. Call Origination to non-geographic numbers

The RIO includes call termination services to STC non-geographic number ranges, including calls to STC 700 and 800 numbers. However, no service is offered covering calls originated from the STC network for termination on other networks.

CITC has conducted an analysis of international practice and has found that in many jurisdictions, call origination to non-geographic number ranges is subject to regulation, except for 700 value added services, which are not in general regulated. To date the rates for 800 origination have been subject to commercial negotiation and it is not clear whether this has produced a result which is consistent with the promotion of competition in 800 services.

CITC is of the preliminary view that rates for the origination of calls from the STC network to OLO 700 numbers should remain subject to commercial negotiation, but that rates for call origination to OLO Freephone 800 numbers should be included in the RIO, and that the price would be expected to be similar to the price for Call Origination from Fixed Services quoted above, namely about 5.0 halalas/min.

**Question 22: Please provide comments on the origination of calls to 700 and 800 numbers, including CITC's preliminary view on the matter.**

### 3. Universal Access Numbers Service

The RIO does not include reference to the origination or termination of calls for Universal Access Number Services (number range 9200). CITC has noted that such services are included in at least one existing Interconnect Agreement. CITC is of the preliminary view that the RIO should include an offer to provide such services.

**Question 23 Please provide comments on Universal Access Number Services, including CITC's preliminary view on the matter.**

### 4. MMS Service

The RIO does not include reference to MMS (Multimedia Messaging Service). CITC has noted that this service is included in at least one existing Interconnect Agreement. CITC is of the preliminary view that the RIO should include an offer to provide such services.

**Question 24 Please provide comments on the Multimedia Messaging Service, including CITC's preliminary view on the matter.**

### 5. Annex G – general

CITC notes that no delivery times are stated for the following services:-

- Call Termination Services (Schedule 2)
- Wholesale International Calls (Schedules 4A and 4B)
- Calls to Directory Enquiries (Schedule 6)
- Calls to Emergency Services (Schedule 7)
- SMS (Schedule 8)

Most of these services will be delivered as part of the initial processes, but where requested separately, a delivery time should be stated. Many of these services will only require Data Management Amendments and numbering changes and should therefore be possible to activate

within the timescales for Data Management Amendments. CITC is of the preliminary view that the RIO should be amended as appropriate to indicate that these services will have delivery times equal to the DMA lead time.

**Question 25** *Please provide comments on the delivery times for these services, including CITC's preliminary view on the matter,*

## 6. Annex G, Schedule 2 - Call Termination Services

The RIO does not currently provide that call termination services are to be offered on the same basis irrespective of the origin of the call. CITC is of the preliminary view that STC should amend the wording of Annex G Schedule 2 to specifically state that call termination services are offered on the same basis whatever the origin of the call.

**Question 26:** *Please provide comments on the above-mentioned call termination issue, including CITC's preliminary view on the matter.*

## 7. Annex G, Schedule 5A – OLO Transmission

Figure 1 suggests that whenever interconnection equipment is collocated, the OLO transmission will comprise a microwave link. CITC believes that in-building collocation should be offered whatever form of transmission system the OLO wishes to use. CITC is of the preliminary view that STC should amend Figure 1 to take into consideration the above comments.

**Question 27:** *Please provide comments on the above-mentioned figure, including CITC's preliminary view on the matter.*

**Question 28:** *Please provide comments on any other matters in Annex G.*

## 1.9 Annex H: Operations and Maintenance Manual

CITC does not have any comments on Annex H at this phase of the Public Consultation.

**Question 29:** *Please provide comments on Annex H.*

## 1.10 Annex I: Quality of Service Measures

### 1. Annex I, Section 1.2.2 - Delivery Time for Interconnect Links

The current RIO states two delivery times: 20 weeks for new Customer Sited Interconnect Links to a new Point of Interconnection (POI) and 10 weeks for Additional CS Links to an existing POI where capacity is available. These intervals were reduced from 24 weeks and 12 weeks respectively in the last update of the RIO.

CITC has again examined international practice and trends in this matter. Benchmark results showed that a delivery time of 20 weeks for new CS Links to a new POI is broadly consistent with best practice, but that best practice delivery time for CS Links to an existing POI where capacity is available is approximately 7 weeks. CITC is of the preliminary view that delivery times for CS Links to an existing POI where capacity is available should be further reduced in order to be more consistent with the benchmark results.

**Question 30:** *Please provide comments on this delivery time matter, including on CITC's preliminary view on the matter. Respondents are encouraged to provide justification for their comments, including, if possible, with reference to international benchmarking.*

## 2. Annex I, Section 1.2.3 - Delivery Time for ISI

ISI is not that much different from CSI and it should be possible to state delivery times. CITC has examined international practice and trends in this matter. Benchmark results showed an average delivery time of 20 weeks for new ISI links and a delivery time of 7 weeks for additional links on an existing ISI link. CITC is of preliminary view that delivery times for ISI links should be specified in the RIO and that they should be broadly consistent with the CITC benchmark results. Furthermore, CITC is of the view that unless the footway box survey finds otherwise, it should be possible to construct the footway box in parallel with other work within the 20 week period.

**Question 31:** *Please provide comments on delivery time for ISI, including on CITC's preliminary view on the matter. Respondents are encouraged to provide justification for their comments, including, if possible, with reference to international benchmarking.*

## 3. Annex I, Section 1.3 - Availability

In Annex I of the STC RIO, availability targets are provided for a number of services including Customer Sited Interconnect Links, Transmission Links and Data Local Access Links.

The CITC has examined international practice and trends in this matter. Benchmark results showed a 'best practice' availability rate of 99.8% for each link per quarter. CITC is of the preliminary view that RIO availability targets for these services should be increased in order to be more consistent with the benchmark results, with commensurate improvement in the annual availability target.

**Question 32:** *Please provide comments on the availability of the three services mentioned above, including on CITC's preliminary view on the matter. Respondents are encouraged to provide justification for their comments, including, if possible, with reference to international benchmarking.*

**Question 33:** *Please provide comments on any other matters in Annex I.*

## 2. Other Issues for Public Consultation on RIO

### 2.1 *Impact of NGN and NGA*

CITC wishes to obtain comments from Respondents as regards the need, if any, to revise the RIO to take into account the introduction of IP-based Next Generation Networks (“NGN”s) and Next Generation Access (“NGA”). CITC has published a Regulatory Framework covering Interconnection on IP based networks. CITC is of the preliminary view that, in the absence of significant deployment by STC of NGNs and NGAs, there is currently no compelling need to significantly revise the RIO. Few regulatory agencies across the globe have come to final decisions on the many NGN and NGA issues, so CITC intends to monitor national and international developments and seek to pursue the application of regulations that are consistent with best practice as it emerges.

STC should, however, provide sufficient forward notification of any changes to network technology or topology that would be likely to impact materially on the past or future investment by OLOs in their interconnection arrangements. CITC notes that Section 1.3.3 of Annex D to the RIO provides for advanced notification of firm proposals to changes to network infrastructure of at least 7 months. CITC is of the preliminary view that the RIO should require that STC provide OLOs with longer advanced notice as regards the introduction of NGN or NGA, and that moreover, STC should consult with OLOs who receive services under the RIO regarding the potential impact on such OLOs’ networks that may result from such changes.

**Question 34:** *Please provide comments on the impact of NGNs and NGAs on the RIO, including CITC’s preliminary views on the matter. Respondents are encouraged to provide justification for their comments, including, if possible, with reference to international benchmarking.*

## Attachment B: STC RIO

[Primary Document](#)

[Annex A : Definitions and Glossary of Terms](#)

[Annex B: Billing Processes and Procedures](#)

[Annex C: Technical Information](#)

[Annex C: Attachment 1 Distribution Frame Characteristics](#)

[Annex C: Attachment 2 Points of Interconnection & Signalling Point Codes](#)

[Annex C: Attachment 3 Saudi Arabian SS7 Signalling Standards](#)

[Annex C: Attachment 4 NXX Number Ranges of STC Exchanges](#)

[Annex C: Attachment 5 STC Synchronization](#)

[Annex C: Attachment 6 Environmental & Power Requirements for Collocations](#)

[Annex C: Attachment 7 STC GSM Network Technical Information](#)

[Annex D: Management of Interconnection](#)

[Annex E: Forecasting](#)

[Annex F: Pricing](#)

[Annex G: Service Schedules](#)

[Annex H: Operations & Maintenance manual](#)

[Annex I: Quality of Service Measures](#)

[Download All](#)