

WCIT - Submissions by J. Walubengo, November 2012

38A 4.3A Members States shall ensure transparency of end-user prices and the provision of clear information on how to access the services and the prices thereof, in particular to avoid unreasonable or surprising bills for international services (e.g. mobile roaming and data roaming), and shall ensure that Operating Agencies take the necessary measures to fulfill these requirements.

This one very interesting. But international interconnection charges are currently private commercial arrangements and will be interesting to see how this private contracts would now be open to Regulatory scrutiny. Either way, Internet International Interconnection charges have dropped significantly and not sure how Regulatory access to the same would have any impact i.e. reduce them further..

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6.0.3 Member States shall promote cost oriented wholesale pricing.

Who says cost oriented wholesale pricing is the best option - particularly within the Internet Markets? And what evidence do we have that wholesale pricing would reduce prices at retail level? Would be happy to review such evidence.

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6.0.4 Member States shall take measures to ensure that fair compensation is received for carried traffic (e.g. interconnection or termination).

I dont understand this one. But it looks borrowed from the Telephone world where Incoming calls from say Europe into Kenya would result in Telkom Kenya pocketing some good revenue. Unfortunately this model does not work on the Internet simply because an Internet Call (skype) from Europe would NOT travel in a single straight line from Europe to Kenya. It may take multiple paths and so makes such a charging mechanism difficult to apportion accross these multiple paths.

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6.0.5 Member States shall ensure that their regulatory frameworks drive the Operating Agencies to establish mutual commercial agreements with providers of international communication applications and services in alignment with principles of fair competition, innovation, adequate quality of service and security.

Why this? I thought this is the natural and typical objective and practice of Operating Agencies (Telcos/ISPs) in a free market economy . Why would we want to put it in law or under ITU recommendations? There could be a benefit but it is not immediately clear.

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6.0.6 The Member States shall take measures to ensure that Operating Agencies have the right to charge providers of international communication applications and services appropriate access charges based on the agreed quality of service.

This could be the contentious one. Where Infrastructure guys aim to have additional pay from Content guys based on the traffic volume generated say by Google, Akamai, NationMedia, etc. Not sure its a good thing since Content Providers in the West/North are likely to block traffic(read access) from African users - given that we would cause them traffic increase that is not "profitable" enough to enable them (Google) make the additional payments as demanded by their upstream infrastructure/Telco provider.

6.2.1 For each applicable service in a given relation, Operating Agenciesadministrations* shall by mutual agreement, on the basis of cost orientation, establish and revise accounting, transit and termination rates to be applied between them, in accordancewith the provisions of Appendix 1 and taking into account relevant CCITT ITU-T Recommendations and relevant cost trends.

*** This is already happening btwn Internet Gateway Providers - why would we want to put it under ITU-T recommendations/framework?Again could be some hidden benefit that is not yet clear.**

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54B 6.5B Member States shall ensure that rates (in particular transit rates, termination rates, and roaming rates) are cost-oriented.

Are we saying that these rates for internet interconnection are currently NOT cost-oriented? Any evidence to support this? Even if they are not Cost-oriented, is there evidence that cost-oriented approach is the best approach (for Internet Interconnection Rates?) Currently this regime is under a free market economy and just not sure Regulatory intervention is necessarily going to give us the expected positive outcome.

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