

National Telecommunications Regulatory Commission - Dominica

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1. No, we have not been receiving information from service providers as to the level of service being offered to customers.
2. We have no way of knowing whether the current standards are being met as the providers do not submit the data.
3. We have no way of knowing whether the providers surpass the current standards as the providers do not submit the data. Further, even if the providers submitted this data there is no way to verify its veracity. This is a futile exercise
4. We do not receive data from the providers, therefore we are unable to determine how far below international standards the service providers fall
5. Our attempts to obtain data from the service providers has proven to be extremely difficult to a near impossible exercise.
6. Yes, we have had customer complaints in relation to QoS. Most of the informal customer complaint are in relation to speed.
7. In general, the customer files the complaint with the NTRC, and when necessary, the NTRC engages in the dispute resolution process.
8. Yes, however, without penalties and the ability to obtain raw data or network monitoring access this is a useless exercise. In addition, there should ~~also~~ be collaboration with the Bureau of Standards in relation to more administrative and technical support for instances of overlapping functions.

9.

- i. In issuing codes of practice, the NTRC should be allowed to impose enforcement mechanisms as the commission determines fit. There should be a compliance and enforcement mechanism
- ii. The QoS regulations should include a clause to authorize the NTRC to put independent monitoring equipment on the networks in order to validate the information received from the providers.
- iii. The reporting structure should force the provider to include an element of percentage compliance to the regulations. Further, the providers must submit all raw data to support compliance.
- iv. The billing accuracy for mobile and broadband are defined at the same threshold, however, tThe billing accuracy for mobile should be more stringent than that of broadband due to the fact that the total numbers for mobile customers are over estimated.
- v. The average throughput and latency are too wide open. The throughput would change based on distance from subscriber even if the bandwidth is the same. This needs to be measured to the closest point or maybe the IXP as the provider does not have control over external networks.
- vi. Regulated subscription packages needs to be defined.
- vii. Net neutrality does not allow the providers to engage in traffic management, which is to the benefit of the customer

Comment [G1]: Items numbered

Comment [G2]: Really?

10.

~~10.~~ Quality of Service KPI's ~~should be developed~~ for DVB-H ~~should be included in the -Subscriber Television Service list.-~~ At the NTRC we have issued a DVB-H license however, there are no standard published apart from the standards stipulated in the Frequency Authorisation.

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~~11.~~ Quality of Service KPI's for Radio and Television should be included in this QoS Regulations.

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