

Introductory Paper to Quality of Service Guidelines

Introduction

The Botswana Telecommunications Authority (BTA) has prepared this consultation document which aims to suggest mechanisms for ensuring that the availability, provision and quality of telecommunications services shall be consistent with the protection of the interests of users and subscribers of those services.

This document briefly sets out the background on the need for performance measurement and the methods that could be adopted. It provides the rationale for the Authority's policy principles in addressing issues of quality of service in the telecommunications industry of Botswana. It also covers the core measurement system that the Authority should adopt following the consultation process. Once consultation is complete, guidelines will be issued and they will form the principal structure/basis for the measurement and reporting standards to be adhered to by all operators.

Once issued the quality of service guidelines will define the performance aspirations for the provision of communications services in Botswana and the BTA will make use of competition to achieve such aspirations.

Rationale for QoS

The Authority recognizes its primary goals to include the following:

- To provide users with comparative information that enables them to make informed decisions as to which of the competing operators available is most suited to their needs;
- Consistent with any special conditions applicable to Botswana, to ensure that performance of communication services meets or exceeds equivalent levels of performance available in other countries;

- To act on behalf of subscribers to propose performance standards where necessary, on service providers where competition is not yet effective.

The Authority is keen to see a single, consistent and agreed approach to service measurement that is applicable to all service providers. Where this is the case common forms of measurement will be used, data will be comparable and operators will understand from the onset what is expected of them.

The Authority wishes to keep the measurement structure simple with a few common principles running throughout. These principles will take as their baseline that any well run operator would wish to monitor and manage their performance quality effectively and efficiently. Thus the measurement requirements should not represent any significant additional administrative load to an efficiently run organization.

The Authority does not expect that communications services in Botswana will necessarily be able to meet the aspirations set for them immediately and therefore proposes a series of stages that will allow these to be met within practical timeframes and without significant disturbance to the infrastructure providing the services. Different services from different providers may be at different stages of this process at the same time.

The quality of service measurement and control methods submitted for consultation, take the form of a number of proposals that define matters of principle against which the measurement process will be developed. The proposals will be reviewed on a regular basis; at least once every two years by the Authority in consultation with stakeholders.

Proposed Measurement Systems

First Proposal- Responsibility of the Authority

In order to achieve its responsibility the Authority will;

- Set a standard framework for the measurement of services for all operators to follow;
- Define realistic short and long term performance targets in pursuance of its legal obligations;
- Consult with interested parties on methods of measurement and targets that are established;
- Compare performance of services provided in Botswana against international benchmarks;
- Ensure that the measurement of performance of services does not impose an unnecessary additional burden, over and above normal good practice on the operators that deliver the services;
- Introduce appropriate measures to ensure that performance targets are met both in the short and long term. This may involve the introduction of sanctions, either for failure to provide the required information or for failure to meet targets;
- Publish comparative performance figures and reports when such are available and of value to users in the selection of services from operators.

Second Proposal – Responsibility of the operators

In meeting the Authority's requirements, operators must;

- Set up measurement systems consistent with the framework proposed;
- Provide regular quarterly returns of the measurement results for all qualifying services to the Authority;
- Aim to meet the short and long term service performance targets set by the Authority.

Third Proposal – Exemption from reporting

The Authority recognises that newly established/ licensed operators will be concentrating on building their infrastructure, setting up interconnection arrangements and establishing themselves within the market. The Authority therefore proposes a period of exemption for new entrants from the

provision of performance measurements during such period of establishment. This period is proposed to be one year from the award of the licence to an operator. The first returns of performance measurement will therefore be expected at the end of the first complete quarter that occurs 12 months after the award of the licence.

Fourth Proposal – Market Types

In some jurisdictions services are measured and reported in groups relating to different markets. The Authority sees no need to differentiate on measurement and reporting by market. If a service is supplied by several sectors, then its measurement should be across the whole population with no requirement for sub division or disaggregation by sector.

If a service is designed to provide for a single market sector, such as the business sector, then the service will stand alone as a result of the different performance that it offers, not as a result of the market it services.

Fifth Proposal – Use of Industry Forum

It is the practice in some jurisdictions to establish and support industry forum attended by users and operators. The Authority could in future establish an industry forum to discuss and establish performance measurements and other relevant issues for any new service or new technology. However, the Authority should prefer, at least in the early stages of establishment of the measurements to concentrate on well entrenched measures of performance which any operator would wish to produce.

Sixth Proposal – Provision of Information to the Authority

The data provided by the operators will be made available to all service providers so that they can see what improvements, if any, are needed in their own performance to be able to compete in the market.

The Authority will from time to time, conduct independent measurements of the services provided in order to confirm, or otherwise, the accuracy of the data provided by the operators.

The Authority recognizes that the measures provided under this regulation may have some commercial sensitivity. It however takes the position that open availability of such information is essential for nurturing competition and it is only by making such data available that the beneficial effects of competition will be felt by all.

Where the operator fails to provide the necessary data, the Authority may, after due warning carry out independent measurement at the expense of the failing operator.

Information will be provided to the Authority by all qualifying operators in respect of qualifying services on a quarterly basis. This will be provided in both hard copy and electronic form so that it could be edited into a consistent format for publication. The Authority may consider extracting user relevant information to assist users to make informed choices between different service providers.

Seventh Proposal – Stages of Development

The Authority recognizes that service measurements taken initially may not meet the standards that are internationally recognized as satisfactory so it proposes three stages of development of measurement process leading to a long term steady state of affairs in measurement systems. The stages are:

- Measure;
- Baseline, comparison and setting of standards;
- Meeting the required performance standards.

Measure

This stage consists of the establishment of measurement systems and provision of returns to the Authority. The purpose of this stage is to

establish accurate and dependable measurement systems and to generate an initial body of reliable data. The time spent on this stage may not exceed 6 months.

Baseline, comparison and setting of standards

Once two quarters of data exist for a service, it will be compared with the set targets. In consultation with service providers, any variance between the achieved performance and all the target performance will be considered, and if necessary, the target may be adjusted. Targets will be set at the same level for the same service types across all operators.

Meeting the required performance standards

The Authority would wish to allow competition to be the main method of enforcement of performance. Performance targets will be published and it is expected that this will inspire operators to meet the agreed targets. The Authority may consider the introduction of sanctions or other form of enforcement mechanisms should the performance targets not be met.

Conclusion

Interested parties are invited to respond in writing to the BTA with comments and suggestions on this document. Comments should be submitted two weeks after the consultative workshop. Following consideration of the responses, the BTA will then issue the formal quality of service guidelines.