General Questions from ICASA

Submitted by Alan Levin, Chairman of Internet Society of South Africa (TelkomSA.net founder and adsl user)

Question 1
Does Telkom inform widely its potential subscribers about all ADSL modems approved by ICASA? If so, how?

Answer:
No it does not. Very few people (including those who are considering subscribing to the ADSL service) know that you may supply your own modem. I have personally advised many of this, as well as that of the filters needed for your telephone extensions. Each one. I request that the hardware distributor test the equipment before it sells it. This keeps competition healthy and prices low.

Question 2
Should customers be restricted to only two suppliers of modems?

Answer:
No. There is no technical reason why this should be. As long as the modems are standards compliant then they will work fine. There are good non-technical reasons why customers should not be restricted and that is to ensure competition and customer choice. This allows customers to choose the best mix of quality and features for their money.

Question 3
Should Telkom guarantee the throughput speeds of the service?

Answer:
Telkom should publish how it manages the network so one can derive the peaks and troughs of network bandwidth availability. Ideally graphical interfaces could assist customers. More importantly it should provide a more responsive customer service.

Question 4
Did Telkom inform their customers that they intended introducing a cap of 3GByte on the service? If so, when and how?

Answer:
Yes. The 3Gb is not the issue. The ~R600 for the connection is the issue.

Question 5

Is it reasonable to put a 3GByte cap on the service? Given the capping of the service, do the subscribers still get the promised 512kbps downstream speed? Please explain.

Answer:

At the correct pricing this is reasonable. 3Gb should be sufficient for family or small business use. It should be made more prominent that more accounts (lots or portions) of 3Gb are purchasable (at the cost of ~R220).

Question 6

Telkom has also communicated that the 3GByte cap protects users from a small minority of people who abuse the service. What would be regarded as abuse of service according to Telkom? Is this an international norm? Is it possible to identify and penalize the minority that abuses the service?

Answer:

I do not believe that the 3Gb is an issue.

Question 7

How does port prioritization affect the quality of service that subscribers receive? Should Telkom give traffic priority to certain subscribers? When should subscribers be informed about port prioritization and how it would affect them?

Answer:

I do not believe in censorship. Port prioritization is considered as censorship and this can harm the Internet industry and consequently the economy even further than it is already. As a customer and citizen of South Africa, I respect our constitution and claim my constitutional right to uncensored TCP/IP. I shall censor what I wish to censor at the edge of the network, unless the response is due to Denial of Service attack or other demonstrable and malicious vandalism.

Question 8

Should there be a duplication of payment for line rental, i.e. ADSL line and line rental business or residential line rental?

Answer:

Depends on price. As long as the price is market related (by global comparisons). Your question relates to how a bill is accounted. This

has little to do with access or regulation. Until competition exists the gross price remains the clear issue.

Question 9
Should Telkom include bandwidth into the cost of line rental and modems?

Answer:
Depends on price. As long as the price is market related (by global comparisons). Your question relates to how a bill is accounted. This has little to do with access or regulation. Until competition exists the gross price remains the clear issue.
In the case of bandwidth, the amount must be clearly indicated as this is a competitive product. By not clearly stating the amount, it undermines any competitive element of Internet services established over the past ten years.

Question 10
How can ICASA ensure that the cost of the service is not excessive?

Answer:
Commission a global comparison. Since Telkom IS a monopoly - and this was not supposed to be the case in 2005 - ensure that it does not continue to rape and plunder our economy. Please commission a global survey, and focus on comparative countries that have competitive telecommunication markets, and pass a regulation that sets the price accordingly.

Question 11
Considering the cost of the service, should subscribers monitor their own international utilization? Or should it be Telkom's responsibility to so monitor?

Answer:
Telkom must manage the network, transparently so that subscribers are aware of the service levels provided. So the answer is both, Telkom has the responsibility to both monitor and the share the monitoring with subscribers. In commercial networks this is a requirement! (a qualifier for business rather than a winner)

Question 12
Should Telkom have a service agreement with ADSL subscribers?
What should it entail?

Answer:
Yes. Downtime (unavailability of the service) in 99.9% of the time period; Minimum speed in 56 Kbps; Maximum 800ms latency of services in milliseconds. It would entail not much different than what they currently offer, only a way that they demonstrate that they exceed this, and in many occasions they have full capacity of 512Kbps , 500ms latency and 99.95% uptime. .

Question 13
Should subscribers of any service be negatively impacted by other subscribers especially if they are paying a premium for the service? How can the situation be remedied?

Answer:
No. Transparency on how the network operates remedies the situation for consumers. This will allow customers to make a considered choice between different products. The differences are more technically and accurately defined.

Question 14
On average what kind of service do ADSL users experience?

Answer:
Below international standards in terms of quality of the service and above international norms in terms of pricing.

Additional Questions

Question 15 (Additional question)
Do you think that the Government and ICASA should force Telkom to deliver internationally comparable ADSL services at internationally competitive rates?

Answer:
Yes. The only other alternative is introducing competition to force Telkom to deliver internationally comparable ADSL services at internationally competitive rates. This will take much longer to establish so ideally both are required.

Question 16 (Additional question)
Should Telkom have a set contention ratio which is made public? (like 50:1 users on a 512 service)?

Answer:
Yes, it should be made publicly tranparent. The various options must have different contention ratios at various prices, this is currently done by ISP's so why is it not required by Telkom?

Question 17 (Additional question)
What do you think is an appropriate Cap (if any) for the ADSL service? Should this cap be measured for only international traffic or local and international?

Answer:
I agree that the price point's start at 3Gb, I disagree strongly, with the price of the line rental. #

Question 18 (Additional question)
Should there be any line rental on ADSL? If yes, please say how much you think is appropriate.

Answer:
The total cost for the line plus 3Gb should be US$29 = R179
Additional 3Gb accounts for R99

Question 19 (Additional question)
Do you think Telkom should be forced to drop all line rental charges on ADSL?

Answer:
No, there are costs in the provision of ADSL lines. That said Telkom is overcharging for line rentals compared to other countries. It should be forced to reduce line charges to that of a comparative and competitive telecommunications company.

<u>General Comments</u>

Additional comments:

Here you can comment on any issue that you think might be relevant to the ADSL service in South Africa. Any suggestions on how ISASA can create policies to ensure the improvement of broadband delivery will be of great value.

Set the price for the line rental as soon as possible. Ensure that it is affordable.

Optional information:

Would you like to make an oral presentation at the ICASA hearing?
Yes.
Name: Alan Levin, Chairman Internet Society of South Africa.
Contact details: alan@isoc.org.za, 082 6008181