



Date: 17<sup>th</sup> July, 2020

NICTA  
Punaha ICT Haus, Sec 34 lot 19&20  
Cnr of Frangipani & Croton Street, Hohola  
P.O Box 8444 Boroko

**SUBJECT: DRAFT RULE ON TELECOMMUNICATIONS QUALITY OF SERVICE PERFORMANCE  
MONITORING- 2<sup>ND</sup> ROUND OF COMMENTS**

Thank you for giving us the opportunity to comment on the proposal. Please find our feedback with regards to the document.

*We specialise in:*

- ★ Training & Consultancy
- ★ Internet Service Provider
- ★ Merchandise
- ★ Event Management & Entertainment
- ★ Web design & hosting
- ★ App Development
- ★ Properties
- ★ Community Service

1) With reference to attachment D point 3. I.e International transmission capacity going below a certain level. We find that this is not a complete requirement, because it depends what server you will Ping. And the traffic is entirely not under the control of our international provider. Not completely because you need peering agreement, but not a lot of control. We believe you need to be more specific here. For example speed test to the nearest node outside of PNG or maybe speed test to a reference server somewhere. In Emstret case for example because we use Kacific satellite the nearest node is our router at Broken hill teleport and not a google server somewhere in the US.

2) We also recommend that these reports should be publish for transparency as in other countries

3) Emstret support this initiative from NICTA

Yours sincerely,

Haroun Rashid  
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