Date: 17th 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- 2ND ROUND OF COMMENTS

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

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,

Rashid

Haroun Rashid
Managing Director
Emstret Holdings Limited