



**TELIKOM PNG**

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27<sup>th</sup> September, 2018

**Mr. Charlies Punaha**  
Chief Executive Officer  
National Information Communication & Technology Authority  
P O Box 8444  
**BOROKO**  
National Capital District

Dear Mr. Punaha,

**SUBJECT: KTHL Cross Submission re-NICTA Declared Services Cross-Submission- v3\_17Sep18**

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Kumul Telecom Holdings Limited (KTHL) comprising Telikom PNG Limited, Bmobile Limited and PNG DataCo Limited wish to thank NICTA for giving us the opportunity to comment on the submissions by other respondents of the said Discussion paper.

The three above mentioned entities jointly submit the attached commentary as the KTHL Cross-Submission. We emphasize again below on our previous submission on the recommendations where there are differences of opinion (on Mobile Terminating Access Service-MTAS, Mobile Roaming/Tower sharing, and Wholesale Broadband Capacity Services):

1. KTHL agrees still that the definition of the Mobile call termination should include the inbound international call.
2. KTHL disagrees much with Mobile Tower declarations and agrees that infrastructures supported by Universal Access Service (UAS) funds should be declared with all other facilities aided by public funds but it also suggested another option: to declare national roaming to publicly declared sites. KTH now believe that the roaming option makes the most sense.
3. KTHL still disagrees with NICTA and therefore believes that it would be premature to declare optical fiber domestic transmission services at this time. The analysis of the Wholesale market was given in the previous submission.

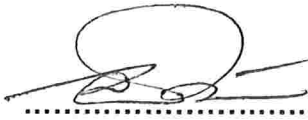
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All the above are now re-visited to test the submissions against the Declaration Criteria.

We look forward to considering your response as well as others and to continuously work in collaboration with you.

Yours sincerely,  
*Kumul Telikom Holdings Limited*



**Mr. Xavier Victor**  
Acting CEO  
Telikom PNG Limited



**Paul Komboi**  
Managing Director  
DataCo PNG



**Athula Biyanwila**  
Chief Executive Officer  
Bmobile Vodafone