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BY: OCEO

KUMUL TELIKOM HOLDINGS LIMITED

30th July 2018

Mr. Charles Punaha
Chief Executive Officer
National Information and Communication Technology Authority
P O Box 8444
BOROKO, National Capital District

DECLARATION/DAS

For your attention

Dear Mr Punaha,

SUBJECT: Potential Declaration of Certain Wholesale Telecommunications Services

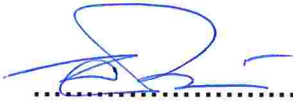
Kumul Telikom Holdings Limited (KTHL), Bmobile Limited and DataCo PNG Limited wish to express our gratitude for giving us the opportunity to comment on the discussion paper in the NICTA organized Public Inquiry into the Potential Declaration of Certain Wholesale Telecommunications Services.

The three above mentioned entities jointly submit the attached commentary as a KTHL submission to the said Public Inquiry. We emphasize below the following main points of the submission:

1. KTHL agrees that the termination of fixed and mobile calls and SMS should continue to be declared services;
2. KTHL agrees that the definition of mobile call termination should include inbound international calls
3. KTHL expected that the international submarine cable services and associated gateways would be re-declared – but fails to see the benefit of now including beach manholes and associated ducts.
4. KTHL agrees that infrastructure supported by universal access funds should be declared – but KTHL also believes that this should be extended to include all facilities aided by public funds.
5. KTHL agrees that the miscellaneous services considered in Chapter 6 and wholesale leased lines (Chapter 8) of the consultation paper should not be declared; and
6. KTHL disagrees with NICTA and therefore believes that optical fibre domestic transmission services should not be declared at this time.

We look forward to considering your comments, those of others and the possibility of submitting further comment on them.

Yours sincerely,



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Xavier Victor
Acting Chief Executive Officer
Kumul Telikom Holdings Limited



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Paul Komboi
Managing Director
PNG DataCo Limited



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Athula Buiyanwila
Chief Executive Officer
Bmobile Limited