



March 20, 2023

Dear Mr. Scott,

**Subject: AIsleCom's Response on Revised and Updated Electronic Communications (Quality of Service) Regulations**

Please see our comments on the questions below:

**Question 1:** Due to the size of our markets, we think it is reasonable to define a national level reporting area. Reports should only cover sub national areas in special circumstances such as when investigating an issue that only affects a particular area.

**Questions 2:** If the NTRC have the resources it could be useful for it to monitor licensees QOS parameters. However, because of the competitive nature our markets it may not be necessary for the NTRC to do so. Having an efficient and well publicized customer complaints system at the NTRC combined with QOS reports from the licensees should be enough for the NTRC and the public to keep track of operators performance.

**Questions 3:** Section 5.7.6 defines a monitoring parameter as a parameter monitored by the NTRC for which the licensees are not required to submit measurements. Section 5.7.7 calls for meeting targets for monitored parameter. There is some confusion in the definition. Can monitored parameters only



measured by the NTRC and can be ignored by operators? How can operators adhere to set targets if they are not required to measure and submit reports for those monitored parameters.

**Question 4:** The publication process is reasonable. However, the times frames described in section 5.8.7 are not clear. Are the time frames mentioned the duration of the publication period? Or are they the time before the results are to be published?

**Question 5:** The process outlined is reasonable. We believe feedback should be sought from a broad section of the public including the bar association, chamber of commerce and other civic groups and technical groups.

**Question 6:** Eighteen months is a reasonable record keeping period.

**Question 7:** Quarterly reports might be too burdensome on the operators. Our markets are not dynamic enough for such frequent reports. Our networks are static compared to large markets where new sites are added on a monthly or even weekly basis. We recommend bi-annual or annual reports.

**Question 8:** One month to prepare and submit QOS report is reasonable.

**Question 9:** Reasonable. The data requested in (i) to (iv) are the minimum required to properly interpret the results provided.

**Question 10:** We agree it's reasonable to appoint a senior officer as a contact person for QOS matters.



**Question 11:** The process is useful. However, the NTRC should have the necessary staff and resources in place to review and verify the reports to ensure no unnecessary burdens are placed on the operators.

**Question 12:** We find the procedure reasonable. In the event of catastrophic event the NTRC might not be able to respond to a request for a Force Majeure certificate. Language should be added to guide the operators in such an event. For example operators should proceed as if a certificate was granted until further notice from the NTRC.

**Question 13:** We find the procedure reasonable.

**Question 14:** We find the proposed regulation for the commission to issue guidelines reasonable.

**Question 15:** An explicit expiration date should be included on the certificate.

**Question 16:** We agree with the exclusions of the mentioned parameters.

**Question 17:** No comment

**Question 18:** No comment



Thanks,

*Dave George*

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