FTTH Policy Consultation

Preliminary Analysis

Summary of 15 stakeholder submissions

Market and Competition Unit -MCU



Respondents

The submissions from 15 respondents

01	Dr. Sebastien Beyh
02	National Human Rights Commission (NHRC)
03	Khatib & Alami
04	Nokia
05	OGERO
06	FIBERWAVES
07	MA Global
08	Cable One
09	GDS
10	Huawei
11	Sodetel
12	Trisat
13	Cedarcom
14	MoT Network Engineering and Civil Department
15	SafawiNet

Preferred regulatory model

RESPONDENT POSITIONS

Reform existing DSP rights

Beyh, OGERO, Cable One, GDS, Sodetel, Trisat, Cedarcom and MoT NE&CD favor Option 1 or a strengthened form of it.

Competitive or hybrid model

NHRC, Khatib & Alami, Nokia, FIBERWAVES and MA Global favor redesigned competitive, regional or hybrid arrangements.

Competition and regularization

Huawei prioritizes effective competition. SafawiNet proposes absorption and upgrading of existing local networks under licensed providers.

OVERALL PATTERN

Respondents divide between reforming existing DSP rights and creating new or area-based licences.

TRA ISSUE FOR DECISION

Choose the primary architecture and define the transition between existing DSP rights, new assignments and local-network regularization.

Licence geography

RESPONDENT POSITIONS

Regional or mixed licences

Beyh, NHRC, Khatib & Alami, Nokia, OGERO, FIBERWAVES, MA Global, Cable One and MoT NE&CD favor regional or mixed national and regional structures.

National rights with regional differentiation

Huawei and Sodetel favor a national basis with differentiated regional conditions. Trisat and Cedarcom protect national DSP rights while allowing non-exclusive regional entry.

Implementation caution

GDS warns against excessive fragmentation. SafawiNet limits local distributors to approved areas under a licensed provider.

OVERALL PATTERN

Most respondents favor area-based or mixed geographic design, but differ on exclusivity and protection of national rights.

TRA ISSUE FOR DECISION

Define geographic boundaries, interaction with the national rollout and whether any area may be closed to parallel deployment.

Licence duration

RESPONDENT POSITIONS

Around 20 years

Beyh, NHRC, Khatib & Alami, MA Global, Cable One, Huawei, Trisat and Cedarcom support 15 to 20 years or at least 20 years.

Longer bankable term

GDS recommends 20 years as an absolute minimum and favors 25 years.

Shorter or model-based terms

Nokia suggests about 10 renewable years. FIBERWAVES proposes 5 to 15 years depending on infrastructure reuse. OGERO links duration to the economic and technical model.

Other views

MoT NE&CD suggests about 15 years. Sodetel and SafawiNet do not quantify a term.

OVERALL PATTERN

Strong agreement exists on long-term regulatory certainty, with recommendations clustering around 20 years.

TRA ISSUE FOR DECISION

Set a bankable term, review points and renewal rules supported by the investment model.

Open access

RESPONDENT POSITIONS

Immediate or universal access

NHRC, Nokia, FIBERWAVES, GDS, Trisat and Cedarcom support access from launch or broadly symmetric open access.

Phased rural treatment

Beyh, MA Global, Cable One, Sodetel and MoT NE&CD accept differentiated or phased obligations in high-cost and rural areas.

Product and SMP distinctions

OGERO supports architecture-dependent passive, active and bitstream products. Huawei favors passive sharing where monopoly exists. GDS, Trisat and Cedarcom seek stricter SMP remedies.

OVERALL PATTERN

Open access is foundational, while timing, wholesale products and SMP treatment remain disputed.

TRA ISSUE FOR DECISION

Define access products, pricing method, equivalence requirements and any rural or investment-related transition.

Investment protection

RESPONDENT POSITIONS

Limited protection with safeguards

Beyh, NHRC, Khatib & Alami, Nokia, FIBERWAVES, MA Global, Cable One and GDS support targeted, time-bound protection linked to milestones.

Longer high-cost protection

MoT NE&CD proposes 6 to 8 years. Cedarcom proposes seven years against publicly funded overbuild in approved private rollout areas.

Alternative support

Huawei links rural franchises to universal-service support. Trisat rejects protection from private overbuild but seeks protection from publicly funded duplication.

Existing assets

SafawiNet asks the framework to preserve compliant local assets that can be upgraded.

OVERALL PATTERN

Respondents support narrow and justified protection rather than blanket exclusivity.

TRA ISSUE FOR DECISION

Define eligible areas and assets, duration, safeguards, review conditions and treatment of planned public investment.

Urban and rural obligations

RESPONDENT POSITIONS

Paired areas and ratios

Beyh, NHRC, Khatib & Alami, OGERO and Cable One support paired areas, ratios or equivalent measurable obligations.

Credits and flexible incentives

Nokia, MA Global, GDS and MoT NE&CD favor coverage ratios, credits or calibrated incentives.

Funding support

FIBERWAVES says pairing does not solve operating costs. Trisat and Cedarcom reject uncompensated mandates and favor targeted funding, fee credits or reverse auctions.

Other views

Huawei addresses rural franchises and universal-service support. SafawiNet focuses local-partner expansion.

OVERALL PATTERN

Respondents strongly reject urban cherry-picking, but differ on how to finance rural obligations.

TRA ISSUE FOR DECISION

Choose measurable rural KPIs, the pairing or credit mechanism and independent GIS verification.

Selection mechanism

RESPONDENT POSITIONS

Comparative evaluation

Beyh, NHRC, Khatib & Alami, Nokia, OGERO, FIBERWAVES, MA Global, Cable One and MoT NE&CD favor a beauty contest or multi-criteria comparison.

Existing DSP rights

GDS, Trisat and Cedarcom reject auctions for existing rights and favor qualification-based or staged procedures.

Limited positions

Huawei marks the question not applicable. Sodetel and SafawiNet do not specify a mechanism.

OVERALL PATTERN

Respondents broadly oppose a pure highest-bid auction and emphasize coverage, capability and investment quality.

TRA ISSUE FOR DECISION

Set transparent qualification and scoring criteria, especially where rollout proposals overlap.

Incumbent and public infrastructure

RESPONDENT POSITIONS

Use public infrastructure

Beyh, Khatib & Alami, OGERO, FIBERWAVES, MA Global, Cable One, Huawei and MoT NE&CD prioritize use of MoT and OGERO passive assets.

Stronger wholesale safeguards

Nokia, GDS, Trisat and Cedarcom seek separation, equivalence of inputs, accounting separation, RAOs and ex-ante oversight.

Public control and fair access

NHRC emphasizes strategic public ownership and value. Sodetel seeks clarity on the 25-office plan. SafawiNet emphasizes fair access without unjustified preference.

OVERALL PATTERN

Public infrastructure is central, but respondents sharply disagree on incumbent governance and parallel builds.

TRA ISSUE FOR DECISION

Set the wholesale governance model, RAOs, equivalence rules, accounting separation, information controls and dispute resolution.

Unregulated market migration

RESPONDENT POSITIONS

Phased regularization

Beyh, Khatib & Alami, FIBERWAVES, MA Global, Huawei, MoT NE&CD and SafawiNet favor registration, transition and absorption pathways.

Enforcement linked to legal alternatives

GDS, Trisat and Cedarcom support firm enforcement once licensed networks become available.

Continuity and system registration

NHRC stresses public-interest safeguards. OGERO requires subscriber registration and disclosure. Nokia asks applicants to account for the large unregulated base.

Limited detail

Cable One and Sodetel do not develop a separate migration model.

OVERALL PATTERN

Migration and enforcement form a core policy issue, with different views on eligibility of existing illegal operators.

TRA ISSUE FOR DECISION

Adopt rules for registration, reseller treatment, cut-off dates, subscriber migration, dues and consumer protection.

RoW and deployment implementation

RESPONDENT POSITIONS

Operational procedures and SLAs

Beyh, Khatib & Alami, MA Global, Cable One, GDS, Trisat, Cedarcom and MoT NE&CD seek clear access procedures, fees, timelines and dispute resolution.

Architecture and asset information

OGERO calls for target architecture, GIS, demarcation, as-built records and O&M governance. FIBERWAVES and SafawiNet stress network audit, mapping and documentation.

Policy safeguards

NHRC asks for consultation before final decisions. Nokia warns against repeating the 2018 ambiguity. Huawei supports sharing and flexible deployment methods. Sodetel seeks interim authorizations.

OVERALL PATTERN

Respondents agree that licensing alone cannot unlock rollout without operational RoW arrangements.

TRA ISSUE FOR DECISION

Finalize the RoW framework, fiber guidelines, inventory, access reference offer, charges and dispute mechanisms in parallel.

Wholesale pricing and financial model

RESPONDENT POSITIONS

Cost transparency and cumulative burden

NHRC, Khatib & Alami, Nokia, OGERO, FIBERWAVES, MA Global, Trisat and Cedarcom seek transparent pricing and an economic test of combined charges.

Revenue-share reform

GDS proposes waiving the 25% FTTH share or a short exemption followed by a lower rate. Sodetel and MoT NE&CD also seek reduction or exemption.

Investment recovery

Beyh supports caps in protected areas. Cable One combines immediate urban access with rural flexibility. MA Global requires recovery of efficient costs and a reasonable return.

Limited detail

Huawei emphasizes sharing and financial support. SafawiNet does not specify a tariff model.

OVERALL PATTERN

Financial terms have become a central policy issue, especially the 25% revenue share and overlapping charges.

TRA ISSUE FOR DECISION

Complete an economic model for revenue share, RoW, passive access and wholesale fibre before fixing rollout commitments.

Cybersecurity rights and resilience

RESPONDENT POSITIONS

Comprehensive rights framework

NHRC uniquely proposes detailed obligations for cybersecurity, resilience, privacy, accessibility and net neutrality.

Technical resilience

Khatib & Alami, Nokia, OGERO, FIBERWAVES, GDS and Cable One address resilience, redundancy, QoS or technical evaluation.

Licence-holder responsibility

SafawiNet places standards, audits, QoS and compliance responsibility on the licensed provider.

Limited standalone treatment

Beyh, MA Global, Huawei, Sodetel, Trisat, Cedarcom and MoT NE&CD do not treat the issue as a separate policy pillar.

OVERALL PATTERN

Respondents broadly recognize resilience, while only NHRC advances a comprehensive rights-based framework.

TRA ISSUE FOR DECISION

Determine which cybersecurity, privacy, accessibility and resilience duties belong in policy, licences or technical guidelines.

Network architecture and operational governance

RESPONDENT POSITIONS

Detailed prescribed architecture

OGERO proposes target network and operating models, shared feeder and OLT options, OSS/BSS, RACI and lifecycle rules. Cable One emphasizes vOLT, SDN and virtual isolation.

Neutral wholesale platform

NHRC, Khatib & Alami and FIBERWAVES favor interoperability or a neutral wholesale platform.

Competition and sharing choices

GDS supports competing fibre in dense areas and open access elsewhere. Huawei prefers passive sharing and warns against active-device sharing.

Less prescriptive approaches

Beyh and MA Global focus on outcomes and operator eligibility rather than a mandated architecture.

OVERALL PATTERN

Respondents differ on whether the TRA should prescribe the operating architecture or remain technology-neutral.

TRA ISSUE FOR DECISION

Set the minimum interoperability and governance requirements while preserving appropriate operator design freedom.

Bitstream and self-build

RESPONDENT POSITIONS

Coexistence of access modes

Khatib & Alami, FIBERWAVES, Cable One, GDS, Sodetel, Trisat and Cedarcom support combinations of passive access, bitstream, VULA or competing self-build.

Geographic exclusivity

OGERO treats bitstream and self-build as mutually exclusive within each footprint.

Passive sharing preference

Huawei favors passive sharing and cautions against active-device sharing.

Direct ISP investment

MA Global seeks a route for qualified ISPs to build and operate regional FTTH. Beyh and NHRC do not make the issue central.

OVERALL PATTERN

OGERO proposes geographic exclusivity between access modes, while most private respondents favor coexistence.

TRA ISSUE FOR DECISION

Assess the competition and legal effects of preventing an operator from combining bitstream access and self-build in one footprint.

Financial and compliance eligibility

RESPONDENT POSITIONS

Technical and financial qualification

Khatib & Alami, Nokia, MA Global, Cable One, GDS, Sodetel, Trisat and Cedarcom support capability, funding and rollout tests.

Compliance and ownership review

NHRC, FIBERWAVES and SafawiNet emphasize ownership transparency, compliance history, audit and regularization conditions.

Settlement of amounts owed

OGERO requires settlement or reconciliation of MoT and OGERO amounts and audits of links with unlicensed providers.

Other views

Huawei focuses deployment plans. Beyh does not treat eligibility as a central theme.

OVERALL PATTERN

Respondents support objective qualification, but differ on how past conduct and disputed amounts should affect eligibility.

TRA ISSUE FOR DECISION

Define lawful criteria, verification, treatment of disputed amounts and proportionate remedies for prior non-compliance.

Thank you

