



Calculation of the costs of efficient provision for some electronic communications services provided at the wholesale level in Romania

## **PoI COST MODEL DOCUMENTATION**

**ANCOM**

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## **PUBLIC VERSION**

**TERA** Consultants

32, rue des Jeûneurs

75002 PARIS

Tél. + 33 (0) 1 55 04 87 10

Fax. +33 (0) 1 53 40 85 15

S.A.S. au capital de 200 000 €

RCS Paris B 394 948 731

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## 0 Context and objectives

### 0.1 Regulatory context

Taking into account the European Commission Recommendation mentioned under Article 15 of the Directive 2002/21/CE, ANCOM reviewed beginning 2012 the different relevant markets in order to identify operators with a significant market power. Significant market power operators have to provide some wholesale electronic communication services at efficient cost-oriented tariffs, based on cost models.

ANCOM, as the regulatory authority of Romania, intends therefore to assess the costs of the different wholesale services provided by operators. In particular, ancillary interconnection services, provided through other interconnection interfaces and/or by other operators, at a point of interconnection are services that should be cost oriented. For this purpose, ANCOM intends to rely on bottom-up cost models.

In the first quarter of 2012, ANCOM with the assistance of TERA Consultants published the Conceptual Framework in which it specified how the costs of these services shall be assessed. ANCOM explained that it intends not to allocate any business overheads to Point of Interconnection services.

The goal of this document is to describe the bottom-up cost model used to calculate the cost of these services (called 'Point of Interconnection cost model' or 'PoI cost model') and the related assumptions and inputs. This document is a final document and reflects final assumptions and opinions of TERA Consultants and ANCOM on the PoI cost model. A draft document was published in September 2012 and was consulted upon. 3 operators provided comments as an outcome of the consultation process. These comments, when relevant, have been used to update the PoI cost model (see the report summarising the responses to the Public Consultation document on calculation of the costs of efficient provision for interconnection services provided at the Point of Interconnection).

The document is divided into 3 sections:

- The first section lists the relevant ancillary interconnection services at stake (see section 1),
- The second section specifies the duration of the tasks necessary for providing these services and the unit costs used (see section 2),
- The last section details the efficient cost of providing the services (see section 3).

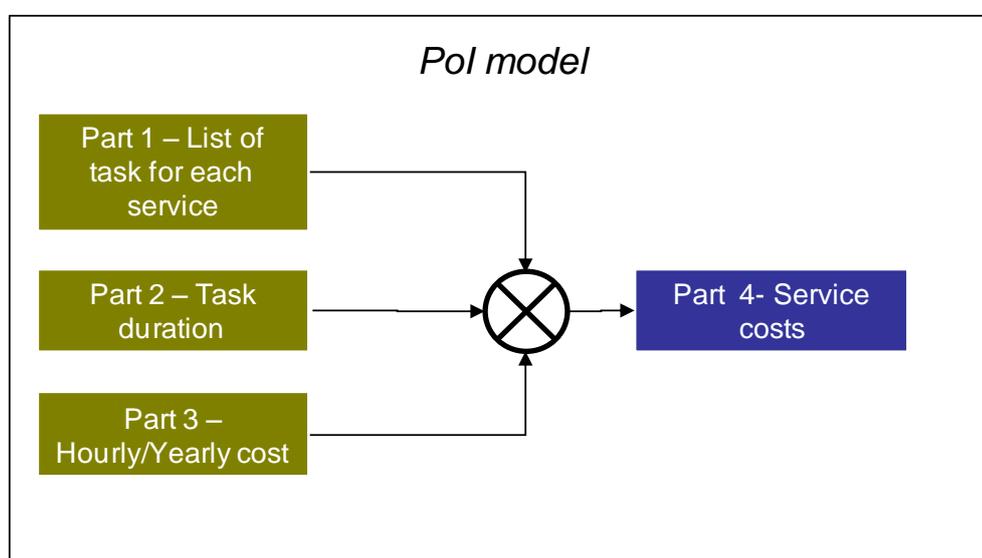
In the next paragraph, the key steps of the model are described.

## 0.2 Steps of the PoI cost model

The provision of ancillary interconnection services involves costs for operators. Taking into account the underlying elements involved in the provision of these services and based on information provided by operators, it is observed that these costs are mainly related to labour activities necessary for the provision of the services. As a consequence, the PoI model mainly estimates time required to carry out tasks (as provided by operators and assessed by experts) and multiply them by a hourly labour cost to obtain a cost for providing ancillary interconnection services. However, when equipments are necessary, they are added to the calculation.

These steps are detailed in the figure below:

**Figure 1 - Steps of the PoI cost model**



Source: TERA Consultants

## 0.3 Data provided by operators

In order to develop the PoI cost model, ANCOM and TERA Consultants issued a data request to operators asking them to detail the costs they incur for providing ancillary services and in particular to detail the tasks necessary to provide these services. Out of the six main fixed and mobile operators in Romania (RCS&RDS, Vodafone, Orange, UPC, Romtelecom, Cosmote), 4 responded. They generally provided:

- A description of the different tasks to be carried out for each ancillary service;
- The associated time required and type of employee involved for this task; and
- The average labour cost per hour related to each type of employee.

In annex of this report, a detailed list of data provided by operators is provided.

The model also uses inputs based on expert advice obtained by ANCOM and TERA Consultants. Where the ancillary service includes rental of network equipment, the

model uses inputs provided by operators, whose reasonability is checked with respect to benchmarks and TERA experience.

As a response to the consultation, operators provided additional information on time duration and these have been considered as well.

Finally a questionnaire was sent to operators to identify the level of protection provided at switching and transmission levels for interconnection. Responses were provided by operators.

The model is based on these data.

## 1 Ancillary interconnection services

### 1.1 List of services currently provided

The points of interconnection can have different configurations, depending on a series of particular circumstances. As a consequence, several ancillary interconnection services are necessary.

Currently, operators provide a range of ancillary services that is listed below. This table shows that operators do not provide exactly the same ancillary interconnection services (in grey services that are not provided by operators).

**Figure 2 – List of ancillary interconnection services provided by operators in Romania**

| Type of service   | Unit                          | VODAFONE | ORANGE  | COSMOTÉ | RCS&RDS        | ROMTELECOM | UPC   |
|---|-------------------------------|----------|---|---------|----------------|------------|-------|
| Configuration of partner in PoA/PoI   | EUR/PoA                       | 730      | 500   | 694     | 750            | 750        | 680   |
| Reconfiguration of partner in PoA/PoI   | EUR/PoA                       | 730      | 500   | 694     |                |            | 680   |
| Removal of partner in PoA/PoI   | EUR/PoA                       | 730      | 500   | 694     |                |            | 680   |
| Installation of port in the switch  | EUR/port of 2 Mbps            | 460      | 400   | 438     | 500            | 500        | 460   |
| Reconfiguration of port in the switch   | EUR/port of 2 Mbps            | 460      | 400   | 438     |                |            |       |
| Removal of port from the switch   | EUR/port of 2 Mbps            | 460      | 400   | 438     | 150            | 150        | 460   |
| Monthly rent of port in the switch  | fixed switch<br>mobile switch | 70       | 60  | 66      | 46<br>70       | 46         | 46    |
| Other reconfiguration operations - for the 1st circuit                        | EUR/port of 2 Mbps            |          | 469   |         | 469            | 469        | 469   |
| Other reconfiguration operations - for each of the other circuits in the same | EUR/port of 2 Mbps            |          | 67  | 67      | 67             | 67         | 67    |
| Installation of transmission equipment  | 1 E1<br>up to 4 E1            | 2 300    | 1 500   | 2 192   | 1 000<br>2 192 |            | 1 800 |
| Removal of transmission equipment   |                               | 2 300    | 1 500   | 2 192   |                |            | 1 800 |
| Connection charge for the IC link   |                               | 380      | 200   | 365     | 500            | 44         | 380   |
| Reconfiguration charge for the IC link  |                               | 380      | 200   | 365     |                |            | 380   |
| Disconnection charge for the IC link  |                               | 380      | 200   | 365     | 150            |            | 380   |
| Leased line monthly fee   | fixed part                    | 315      | 380   | 482     | 315            | 44         | 420   |
|   | <50km - for Pol in NoData     | 270      | 270   | 292     | 270            |            | 280   |
|   | 51-100km                      |          |   |         |                | 522        |       |
|   | 101-150km                     |          | 500   |         |                | 1 172      |       |
|   | 151-250km                     |          |   |         |                | 1 416      |       |
|   | >250km                        |          | 4   |         |                |            |       |
|   | variable part                 |          |   |         |                |            |       |
|   | <50km - for Pol in NoData     |          |   |         |                | 23         |       |
|   | 51-100km                      |          |   |         |                | 12         |       |
|   | 101-150km                     |          |   |         |                | 6          |       |
|   | 151-250km                     |          |   |         |                |            |       |
|   | >250km                        |          | 4   |         |                | 4          |       |
| Installation of STM1 port   | EUR/STM1 port                 | 600      |   |         |                |            |       |
| Removal of STM1 port  | EUR/STM1 port                 | 600      |   |         |                |            |       |
| Installation of STM1 transmission equipment                                   | EUR/STM1 equipment            | 5 000    |   |         | 2300           |            |       |
| Removal of STM1 transmission equipment  | EUR/STM1 equipment            | 5 000    |   |         |                |            |       |
| Installation of STM1 interface  | EUR/STM1                      | 500      |   |         |                |            |       |
| Removal of STM1 interface   | EUR/STM1                      | 500      |   |         |                |            |       |
| STM1 port monthly fee   | EUR/STM1/month                | 1 800    |   |         |                |            |       |
| Capacity reservation  | EUR/E1                        | 200      |   | 250     |                |            |       |
| Increase of capacity order  | EUR/E1                        | 400      | 50% of the difference between ordered and planned | 500     |                |            |       |
| Decrease of capacity order  | EUR/E1                        | 500      | 80% of the difference between planned and ordered | 600     |                | 500        |       |
| Reconnect a suspended service   | EUR/E1                        | 350      | 150   | 320     |                |            |       |
| Connecting the equipments of 2 operators collocated in Romtelecom's space     | EUR/link of 2 Mbps            |          |   |         |                |            | 100   |
| Connecting the equipments of 2 operators collocated in Romtelecom's space     | EUR/link of 2 Mbps/month      |          |   |         |                |            | 0,06  |
| Administration fee for cascade payment in the transit arrangements            | EUR/operator/month            |          |   |         |                |            | 73    |

Source: TERA Consultants from ANCOM data

### 1.2 Relevance of services currently provided

Before assessing the cost of the different ancillary interconnection services, it is necessary to ensure that the list of ancillary interconnection services is not too heterogeneous from an operator to another and to identify which services are relevant or not. As an outcome of the consultation process, Romanian operators have been in a

position to clarify and objectively justify whether or not those services that are identified as not relevant should be removed.

There are 5 main “groups” of ancillary interconnection services which are described below: “configuration/reconfiguration/removal of Partner in PoI/PoA”, “installation, reconfiguration or removal of port in the switch”, “installation/removal of transmission equipment”, “installation/removal of 2Mbps interface” and “rental services” (port, interconnection links). There are however some additional services described after.

Each of the 42 service listed above is reviewed below:

- The service “configuration of Partner in PoI/PoA” is one of the key main services and is obviously necessary to enable operators to interconnect each other. “Reconfiguration of partner in PoA/PoI” and “Removal of partner in PoA/PoI” are from the same “family” of services and are also necessary in case of change of configuration or end of service being provided. In other words, because “configuration of Partner in PoI/PoA” is a necessary service, these two services are also necessary.
- Similarly, the “installation of a port in the switch”, its removal or its reconfiguration are necessary ancillary interconnection services. However, it does seem necessary to provide in addition to these services the following services “Installation of STM1 port”, “removal of STM1 port”:
  - Vodafone is the only operator which provides it and the price difference is limited to 30%;
  - It is not clear why the cost of installing or removing (not the cost of the port of course) would be very different for a standard port (E1). In particular, Vodafone did not provide any justification for it;
  - Finally, operators do not seem to order any STM1 ports.

As a conclusion, the installation/removal of ports should be identical for E1 or STM1.

- The “monthly rent of port of the switch” service is necessary to make sure the cost of ports and the related maintenance costs are recovered. However, the distinction between fixed and mobile should disappear and RCS&RDS is the only operator to provide such a distinction which does not appear to be justified from a cost point of view. This cost is indeed made of equipment costs and operating costs and, while switches may slightly differ between mobile and fixed networks, it is important to note first that the port installed in the switches are of same nature for fixed and mobile networks and should therefore not have different costs and second that operating costs, which account for the vast majority of costs for this service, have no reason for being different. This port can be either STM1 or E1.
- The “installation of transmission equipment” and “Removal of transmission equipment” services are necessary to make sure operators can install their

equipment at the Point of Interconnection. However, these services are subdivided by some operators and this does not seem to be justified:

- For example, RCS&RDS is the only operator proposing a pricing differentiation between “Installation of a transmission equipment of E1 capacity” versus “Installation of transmission equipment above E1 and up to 4xE1 capacity”. However, no cost information has been provided and it does not seem that there are any significant cost differences between the installation of the two types of equipment.
- Same for the “installation of STM1 transmission equipment” which is only proposed by Vodafone and Cosmote.

Also, the time necessary to provide these services can vary significantly from one site to another, from one operator to another (operators submissions vary by almost 10 times), depending on the type of traffic, etc. Even with same efficient processes, the nature of these services may depend significantly on the type of sites and configurations at stake. Rather than trying to identify a unique price for these services, it is proposed:

- to determine the time required to provide these services on a case by case basis,
- to publish a price per hour,
- to calculate the price of the service by multiplying the time assessed on a case by case basis by the price per hour.

This will provide more flexibility for operators providing this service and will lower the risk of under-recovery which could happen with a unique time duration value.

Moreover, the relevance of this service is limited only to the case where the interconnection point is situated in the other operator' premises, and the link is bi-directional. In all other cases, this service should not be applied.

- The services “Installation of 2 Mbps interface”, “Reconfiguration of 2 Mbps interface” and “Removal of 2 Mbps interface” are necessary for the connection between the host operator and the hosted operator at the PoI. Vodafone provides separate services for 2Mbps and STM1 with a higher price for the latter. However, it is not justified why these services would take more time if the interface is STM1 and not E1. Therefore, for installing a STM1 interface, the cost should be the same as for a 2Mbps interface. As the activities underlying the provision of these installation/reconfiguration/removal are the same irrespective of the capacity of the interface, actual services names may be confusing. It is therefore proposed to name them “connection charges for the IC link”, with subsequent variances for reconfiguration and disconnection.
- All operators provide two other configuration services: “Other reconfiguration operations - for the 1st circuit” and “Other reconfiguration operations - for each of the other circuits in the same reconfiguration operation”, except Vodafone.

These ancillary services are necessary for other circuit reconfiguration and have been reviewed by ANCOM during dispute resolution (NB: ports reconfiguration and 2Mbps/STM1 interface reconfigurations are already discussed above).

- The “capacity reservation” service is provided by 2 operators only despite ANCOM’s decision n°109/2012 being imposed on all operators. No cost information has been provided for this service by the 2 operators. However, it is noted as per reference interconnection offers that this is a prevention mechanism: the reservation fee is deducted from the installation fees for the installed capacities. Also, depending on the supplier delivery process, it may be necessary to charge such a service to make sure operators requesting the service are reserving capacity when they need it. It prevents potential inefficient behaviours from operators which would pre-order capacity for free but would not order this capacity in the end. As this fee is only a fee which aim is to avoid such behaviours, it cannot be cost based (there is no cost related to it, like for penalties). As a consequence, ANCOM proposes to retain the lowest fee between Cosmote and Vodafone (i.e. €200).
- “Unplanned capacity order” is a service that is normally applied when an increase in the capacity is ordered by the interconnection partner. This service prevents inefficient behaviours of other operators which are not planning sufficiently their demand and is therefore necessary. As the name of this service may be confusing, it is proposed to name it “increase of capacity”.
- “Modification of capacity order” is also a relevant service in case an operator wants to reduce the capacity requested during the ordering process. As the name of this service may be confusing, it is proposed to name it “decrease of capacity”.
- “Reconnect a suspended service” is also necessary if, for whatever reasons, the interconnection service is suspended and needs then to be re-established.

In addition to these services presented above, additional services are proposed by operators:

- The list of ancillary interconnection services includes also leased lines services used as interconnection links. Leased lines services involve 3 types of costs:
  - connection/disconnection/reconfiguration costs which are one-off costs recovered by “Connection charge for the IC link”, “reconfiguration charge for the IC link” and “Disconnection charge for the IC link” charges. They are calculated in the PoI model.
  - Access network costs which are calculated in the access network cost model previously developed by ANCOM.
  - Core network costs which are calculated in the core network cost model developed in parallel to the PoI model. The costing of leased lines is

carried out in the fixed core network cost model (with separate documentation), not in the PoI cost model.

The pricing of leased lines will be decided in a separate consultation on pricing. It should be based on RomTelecom's regulated leased lines offers. Indeed:

- Operators can either use their own infrastructure and or a leased line from Romtelecom, which is the most extensive network.
- Considering the fact that leased lines used for interconnection should be relatively short (50 – 100 km – NB: only 2 operators provide leased lines above 50 km) and the fact that Romtelecom's prices are lower for these types of leased lines and available to any operator, it is proposed to align leased line prices to Romtelecom's prices (calculated in the fixed core network cost model).
- Romtelecom provides additional services: "Connecting the equipments of 2 operators collocated in Romtelecom's space" and "Connection fee Connecting the equipments of 2 operators collocated in Romtelecom's space - monthly fee" and "Administration fee for cascade payment in the transit arrangements". It is understood that it is only relevant for Romtelecom, as being the only operator with collocation and transit obligations. There is no ground to impose these services on other operators, but if they wish to offer them, they are encouraged to observe the levels of the corresponding tariffs derived from this model.

No additional ancillary interconnection service has been stated as necessary by operators.

It should however be noted that maintaining the SS7 interconnection architecture inflates the costs of interconnection: interconnection on the basis of IP interface (used by small operators) should be much more cost effective.

Technical advances in IP interconnection recommend a move towards this type of interconnection in the future, in order to allow Romanian operators to unlock the benefits from more efficient interconnection architectures.

### 1.3 Summary of ancillary interconnection services considered

Table 1 – List of relevant interconnection services

| # | Ancillary interconnection service     | Comment                       |
|---|---------------------------------------|-------------------------------|
| 1 | Configuration of partner in PoA/PoI   | <i>Includes material also</i> |
| 2 | Reconfiguration of partner in PoA/PoI | -                             |

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|    |   |  |
|----|---|--|
| 3  | Removal of partner in PoA/PoI   | -  |
| 4  | Installation of port in the switch  | <i>Includes material also</i>  |
| 5  | Reconfiguration of port in the switch   | -  |
| 6  | Removal of port from the switch   | -  |
| 7  | Monthly rent of port in the switch  | <i>Includes material also</i>  |
| 8  | Other reconfiguration operations - for the 1st circuit  | -  |
| 9  | Other reconfiguration operations - for each of the other circuits in the same reconfiguration operation | -  |
| 10 | Installation of transmission equipment  | <i>Only price per hour should be published as the time necessary to provide the service can vary significantly</i> |
| 11 | Removal of transmission equipment   | <i>Only price per hour should be published as the time necessary to provide the service can vary significantly</i> |
| 12 | Installation charge for the IC link   | -  |
| 13 | Reconfiguration charge for the IC link  | -  |
| 14 | Removal of the IC link  | -  |
| 15 | Increase of capacity  | -  |
| 16 | Decrease of capacity  | -  |
| 17 | Reconnect a suspended service   | -  |
| 18 | Connecting the equipments of 2 operators collocated in Romtelecom's space - connection fee              | <i>Romtelecom only</i>   |

|    |   |                             |
|----|---|-----------------------------|
| 19 | Connecting the equipments of 2 operators collocated in Romtelecom's space - monthly fee | <i>Romtelecom only</i>      |
| 20 | Administration fee for cascade payment in the transit arrangements                      | <i>Romtelecom only</i>      |
| 21 | Leased Lines  | <i>See Fixed core model</i> |

Source: TERA Consultants

## 1.4 Typical tasks corresponding to the services

For some ancillary interconnection services, three operators have provided a detailed list of tasks that are necessary to implement these ancillary interconnection services. Operators provided very different types of tasks. Also, for some services, ANCOM issued some decisions in the past which are based on a list of task. ANCOM's decision no. 15/2011 and decision 244 of 2008 provide a list of tasks for the following services:

- installation IC link (including removal of interface);
- other reconfiguration operations - for the 1st circuit;
- other reconfiguration operations - for each of the other circuits in the same reconfiguration operation.

However, typically, the following types of tasks are carried out (not for all services):

- Analyze request from the operator;
- Draft a solution;
- Agree between operators on the technical solution;
- Plan and carry out the configuration;
- Carry out network test;
- Carry out Billing tests.

As explained in section 0.2, the PoI cost model calculates the cost of ancillary interconnection services by multiplying the number of hours required to carry out tasks for the provision of the service by the hourly labour cost. While this is valid for the vast majority of services listed in table 1, this is not applicable for the following services:

- 7 - Monthly rent of port in the switch
- 10 - Installation of transmission equipment

- 11- Removal of transmission equipment
- 19 - Connecting the equipments of 2 operators collocated in Romtelecom's space - monthly fee
- 20 - Administration fee for cascade payment in the transit arrangements
- 21 - Leased Lines

These services will be treated separately (see section 3).

## 2 Costing elements

As explained in Figure 1 - Steps of the Pol cost model, the time necessary to provide the ancillary interconnection services and the labour unit costs are key inputs to calculate the service costs. They are detailed below. A description of material costs involved is also proposed.

### 2.1 Time required to provide services

To provide a robust estimate of the time required to provide ancillary interconnection services, two parallel approaches have been followed:

- 1 A first approach which consists in collecting time estimates from operators and to compare them. This information is very important since it enables to understand and identify the tasks that are necessary to provide ancillary interconnection services. However, operators have provided sometimes very different estimates and have not provided similar levels of details. Also, some operators may have incentives to overestimate or underestimate these values. As a consequence, a concurrent approach is necessary.
- 2 A second approach where independent expert view is used in addition to ANCOM's past decisions. ANCOM and TERA Consultants have met 3 different independent experts who provided either time estimates or general guidance for estimating the time required to provide ancillary interconnection services. TERA Consultants and ANCOM have then produced their own estimates based on this information.

These two approaches are then compared and when operators' views give significantly different estimates than expert views, expert views have been preferred.

Operator expert view received following the national consultation has been used to fine-tune some task durations in the independent expert views.

#### 2.1.1 Operators' estimates

Here, the general approach for determining the efficient time required for providing ancillary interconnection services is to use the shortest time required amongst the different estimates provided by operators.

Considering that – to our knowledge - ancillary interconnection services should be provided with similar levels of quality amongst operators, using the shortest task duration will give incentives to operators to improve the efficiency of providing these services (which can be considered by operators as having less importance than retail services for example). It will also enable to ensure that some operators are not paying for inefficiencies (such as bad organization) of other operators.

From a general point of view, it is to be noted that operators have sometimes provided similar durations for similar services while services can require less time. This has been considered in the assessment.

The results of the comparison of the time required to provide interconnection services provided by operators are listed in the table below.

**Table 2 – Time necessary for providing ancillary interconnection services**

| #  | Ancillary interconnection service   | Duration provided (hours)   | Comment   |
|----|---|-----------------------------|---|
| 1  | Configuration of partner in PoA/Pol   | <b>35</b> <del>-X-X-X</del> | <i>Shortest duration is selected. Three operators have provided similar durations (35, X and X)</i>   |
| 2  | Reconfiguration of partner in PoA/Pol   | <b>35</b> <del>-X</del>     | <i>Shortest duration is selected. The scope of work is similar to #1</i>  |
| 3  | Removal of partner in PoA/Pol   | <b>8.7</b> <del>-X</del>    | <i>The value of 8.7 is much more relevant as 35.2 because the work requested should be much smaller (the value of 35.2 is the same for #1, 2 and 3) while some tests are not required</i> |
| 4  | Installation of port in the switch  | <b>6</b> <del>-X-X-X</del>  | <i>Shortest value seems abnormally low considering the tests that are required.</i>   |
| 5  | Reconfiguration of port in the switch   | <b>18,8</b> <del>-X</del>   | <i>Shortest is selected</i>   |
| 6  | Removal of port from the switch   | <b>6,5</b> <del>-X -X</del> | <i>Shortest is selected.</i>  |
| 7  | Monthly rent of port in the switch  | <i>TREATED SEPARATELY</i>   |   |
| 8  | Other reconfiguration operations - for the 1st circuit  | <b>20</b> <del>-X</del>     | <i>Shortest is selected</i>   |
| 9  | Other reconfiguration operations - for each of the other circuits in the same reconfiguration operation | <b>3</b> <del>- X</del>     | <i>Shortest is selected</i>   |
| 10 | Installation of transmission equipment  | <b>9</b> <del>-X-X</del>    | <i>Shortest is selected</i>   |
| 11 | Removal of transmission equipment   | <b>5</b> <del>-X-X</del>    | <i>Shortest is selected</i>   |

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|    |  |                           |  |
|----|--|---------------------------|--|
| 12 | Installation of 2 Mbps interface   | <b>4,7</b> ✗              | <i>Shortest is selected</i>                                  |
| 13 | Reconfiguration of 2 Mbps interface  | <b>4,4</b> ✗              | <i>Shortest is selected</i>                                  |
| 14 | Removal of 2 Mbps interface  | <b>2,3</b> ✗              | <i>Shortest is selected</i>                                  |
| 15 | Increase of capacity   | <b>21,7</b> - ✗           | <i>Shortest is selected</i>                                  |
| 16 | Decrease of capacity   | <b>13,2</b>               | <i>Only one operator provided duration</i>                   |
| 17 | Reconnect a suspended service  | <b>5</b> - ✗              | <i>Shortest is selected. Two operators provided duration</i> |
| 18 | Connecting the equipments of 2 operators collocated in Romtelecom's space - connection fee | <b>23</b>                 | <i>Only one operator provided duration</i>                   |
| 19 | Connecting the equipments of 2 operators collocated in Romtelecom's space - monthly fee    | <i>TREATED SEPARATELY</i> |  |
| 20 | Administration fee for cascade payment in the transit arrangements                         | <i>TREATED SEPARATELY</i> |  |
| 21 | Leased Lines   | <i>TREATED SEPARATELY</i> |  |

*Source: TERA Consultants*

While the approach detailed above enables to ensure that only efficient task durations are considered, this approach needs to be complemented by further assessments. Indeed, sometimes, only one operator provided estimates for a given service, or durations provided are extremely heterogeneous. As a consequence, in order to verify whether the values selected above are relevant, a further assessment is carried out based on TERA's expertise and experts interviews.

### 2.1.2 Expert view

This assessment is based on the split of ancillary interconnection service provisions into tasks (provided by operators) and aims at calculating high level estimates of reasonable time required. This approach is conservative because assessing service duration by assessing duration of each task necessary to provide the service tends to inflate total duration.

The results of the assessment are presented in the table below and the details of assumptions are in annexes. It is based on expert views and/or ANCOM's past decisions. When making these assessments, it has been considered the fact that removal should be much quicker than installation and that an efficient operator should be able to run many tests automatically.

Following the public consultation, the high level estimates of the independent expert view have been crosschecked with respect to the duration of some activities. As a result, durations for some component activities has been revised upwards.

**Table 3 – Time required to provide ancillary interconnection services based on TERA Consultants' expertise**

| #  | Ancillary interconnection service   | High level estimates of time required (hours rounded) |
|----|---|---|
| 1  | Configuration of partner in PoA/PoI   | 35  |
| 2  | Reconfiguration of partner in PoA/PoI   | 35  |
| 3  | Removal of partner in PoA/PoI   | 11,7  |
| 4  | Installation of port in the switch  | 17,5  |
| 5  | Reconfiguration of port in the switch   | 16,5  |
| 6  | Removal of port from the switch   | 6,5   |
| 7  | Monthly rent of port in the switch  | 1   |
| 8  | Other reconfiguration operations - for the 1st circuit  | 24  |
| 9  | Other reconfiguration operations - for each of the other circuits in the same reconfiguration operation | 4,9   |
| 10 | Installation of transmission equipment  | <i>Not assessed</i>                                   |
| 11 | Removal of transmission equipment   | <i>Not assessed</i>                                   |

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|    |  |                           |
|----|--|---------------------------|
| 12 | Connection charge for the IC link  | 5,7                       |
| 13 | Reconfiguration of the IC link   | 5,3                       |
| 14 | Disconnection charge for the IC link   | 4,1                       |
| 15 | Increase of capacity   | 23,8                      |
| 16 | Decrease of capacity   | 13,2                      |
| 17 | Reconnect a suspended service  | <i>Not assessed</i>       |
| 18 | Connecting the equipments of 2 operators collocated in Romtelecom's space - connection fee | 12,8                      |
| 19 | Connecting the equipments of 2 operators collocated in Romtelecom's space - monthly fee    | <i>TREATED SEPARATELY</i> |
| 20 | Administration fee for cascade payment in the transit arrangements                         | <i>TREATED SEPARATELY</i> |
| 21 | Leased Lines   | <i>TREATED SEPARATELY</i> |

*Source: TERA Consultants*

NB: Only Romtelecom and Vodafone provided a level of details that allows a proper assessment. However, Romtelecom and Vodafone provided information only for a part of the services. This was complemented by past ANCOM's decisions for four services (services 8, 9, 12 and 14). For these four services, reconciliation was carried out between ANCOM's past decisions and Vodafone and Romtelecom's submissions. However, there were some discrepancies and in this case, ANCOM's past decisions have been considered. For other services, either the assessment was not carried out (services 10, 11 and 17), or the service was similar to another service and the assessment was based on this latter service (services 2, 3, 5 and 13), or another operator provided sufficient detail (services 15 and 16).

This assessment shows that for the majority of services, time required to provide services as calculated based on the minimum duration provided by operators is very similar and only higher for two ancillary services.

The expert view is therefore preferred:

- Considering the fact that operators' submissions are greatly heterogeneous in terms of time duration and sometimes extremely unlikely but give interesting insights on the tasks that are necessary to provide services.
- Considering the fact that expert view is much more homogeneous and independent.

For the following service, no detailed task list was provided by operators and therefore, durations directly provided by operators have been used (and considered as reasonable): Reconnect a suspended service.

## 2.2 Hourly labour cost

Four operators provided unit labour costs: Cosmote, Orange, Romtelecom and Vodafone.

Operators' unit labour costs vary from a role to another and also from an operator to another. They vary by maximum 20%.

These data have been compared with operators' financial public information and this comparison shows that hourly costs provided by operators are reasonable.

Although they appear high when compared with the average labour costs in Romanian statistics for the sector, the level of aggregation of the statistics data may be less reflective of the professional qualifications necessary for the performance of these services.

Two treatments have been conducted to use these hourly costs:

- Time for training, illness, maternal/paternal leave, unpaid holidays, unmotivated absence and breaks and communications have been estimated to calculate a cost per worked hour.
- 3 different hourly costs have been derived: hourly cost of bureaucratic and paperwork<sup>1</sup>, hourly cost of technical and on site work<sup>2</sup> and hourly cost of network testing and analysis<sup>3</sup> because these 3 roles involve different grades and therefore different wages. For operators having provided a unique hourly cost, three different hourly costs have been derived from this unique hourly cost.

Average hourly cost between the 4 operators has been calculated and used in the model as base case.

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<sup>1</sup> Corresponds to P1 for RomTelecom and P3 for Cosmote

<sup>2</sup> Corresponds to P2 for RomTelecom and P2 for Cosmote

<sup>3</sup> Corresponds to P2 for RomTelecom and P4 for Cosmote

## 2.3 Material costs

One operator –Vodafone- provided also material costs for 6 of these services (other operators provided only time required):

- Configuration of partner in PoA/PoI (cost of the cable/patch between distribution frame and transmission equipment);
- Installation of port in the switch (cost of the cable/patch between distribution frame and transmission equipment);
- Removal of port from the switch (cost of the cable/patch between distribution frame and transmission equipment);
- Monthly rent of port in the switch (cost of the port).

Some of these material costs appear to be relevant and have been included in the calculation for the cost of the task, but some are not relevant:

- Cost of the cable/patch between distribution frame and transmission equipment is relevant and has been included for the services “Configuration of partner in PoA/PoI” and “Installation of port in the switch”. Indeed, a short cable is required. The cost of such a cable, for 20 meters is around €12<sup>4</sup>.
- Cost of the cable/patch between distribution frame and transmission equipment is not relevant for the service “Removal of port from the switch” because it is already paid by operators in the service “Installation of port in the switch”. Including this cost twice would lead to cost over-recovery.
- Monthly rent of port in the switch should include maintenance and depreciation of ports and depreciation of port costs and amounts to €19 per month for E1 and €315 per month for STM1:
  - Port costs are calculated for E1 and STM1 on the basis of unit costs provided by one operator. They are depreciated over 12 years with a price trend of -5%, in accordance with the fixed core network cost model.
  - Maintenance and testing costs have been assessed assuming 1 hour per month are spent by one staff person.
  - Costs of switching ports and transmission ports is included.
  - Costs of DDF or ODF is included.
  - Protection is taken into account by multiplying these costs by a factor (close to 2). A questionnaire was sent to operators and responses to this questionnaire have been used.

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<sup>4</sup> One operator provided a significantly higher value which does not appear realistic

The table below lists the material costs included for each ancillary interconnection service:

**Table 4 – Material costs necessary for ancillary interconnection services**

| #  | Ancillary interconnection service   | Material costs proposed by operators       | Material costs considered as relevant   |
|----|---|--|---|
| 1  | Configuration of partner in PoA/Pol   | <i>Cable/patch</i>                         | <i>Cable/patch</i>  |
| 2  | Reconfiguration of partner in PoA/Pol   | -  | -   |
| 3  | Removal of partner in PoA/Pol   | <i>Cable/patch</i>                         | -   |
| 4  | Installation of port in the switch  | <i>Cable/patch</i>                         | <i>Cable/patch + DDF/ODF + Switching port (with protection) + Transmission port (with protection)</i> |
| 5  | Reconfiguration of port in the switch   | -  | -   |
| 6  | Removal of port from the switch   | -  | -   |
| 7  | Monthly rent of port in the switch  | <i>Ports</i>                               | <i>ports</i>  |
| 8  | Other reconfiguration operations - for the 1st circuit  | -  | -   |
| 9  | Other reconfiguration operations - for each of the other circuits in the same reconfiguration operation | -  | -   |
| 10 | Installation of transmission equipment  | <i>Fibre optics and transmission cards</i> | -   |
| 11 | Removal of transmission equipment   | <i>Fibre optics and transmission cards</i> | -   |
| 12 | Connection charge for the IC link   |  |   |
| 13 | Reconfiguration of the IC link  |  |   |
| 14 | Disconnection charge for the IC link  | -  |   |
| 15 | Unplanned capacity order  | -  | -   |

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|    |  |                               |                           |
|----|--|-------------------------------|---------------------------|
| 16 | Modification of capacity order   | -                             | -                         |
| 17 | Reconnect a suspended service  | -                             | -                         |
| 18 | Connecting the equipments of 2 operators collocated in Romtelecom's space - connection fee | -                             | -                         |
| 19 | Connecting the equipments of 2 operators collocated in Romtelecom's space - monthly fee    | -                             | -                         |
| 20 | Administration fee for cascade payment in the transit arrangements                         | <i>TREATED<br/>SEPARATELY</i> | <i>TREATED SEPARATELY</i> |
| 21 | Leased Lines   | <i>TREATED<br/>SEPARATELY</i> | <i>TREATED SEPARATELY</i> |

*Source: TERA Consultants*

### 3 Main results

For results which mainly depend on labour, the results of the proposed approach are presented in the table below.

**Figure 3 – Costs of ancillary interconnection services**

| #  | Ancillary interconnection service   | Cost per service (€)      |
|----|---|---------------------------|
| 1  | Configuration of partner in PoA/PoI   | 539                       |
| 2  | Reconfiguration of partner in PoA/PoI   | 526 <sup>5</sup>          |
| 3  | Removal of partner in PoA/PoI   | 148                       |
| 4  | Installation of port in the switch  | 276                       |
| 5  | Reconfiguration of port in the switch   | 247                       |
| 6  | Removal of port from the switch   | 100                       |
| 7  | Monthly rent of port in the switch  | <i>TREATED SEPARATELY</i> |
| 8  | Other reconfiguration operations - for the 1st circuit  | 358 <sup>6</sup>          |
| 9  | Other reconfiguration operations - for each of the other circuits in the same reconfiguration operation | 61 <sup>7</sup>           |
| 10 | Installation of transmission equipment  | <i>TREATED SEPARATELY</i> |
| 11 | Removal of transmission equipment   | <i>TREATED SEPARATELY</i> |
| 12 | Connection charge for the IC link   | 89                        |

<sup>5</sup> This service has lower costs than the previous one because it does not require again material costs.

<sup>6</sup> This is lower than the cost of ANCOM's decision 244 of 2008 because testing durations have been reviewed

<sup>7</sup> This is lower than the cost of ANCOM's decision 244 of 2008 because testing durations have been reviewed

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|    |  |                       |
|----|--|-----------------------|
| 13 | Reconfiguration of the IC link   | 84                    |
| 14 | Disconnection charge for the IC link   | 64                    |
| 15 | Increase of capacity   | 350                   |
| 16 | Decrease of capacity   | 199                   |
| 17 | Reconnect a suspended service  | 170                   |
| 18 | Connecting the equipments of 2 operators collocated in Romtelecom's space - connection fee | 187                   |
| 19 | Connecting the equipments of 2 operators collocated in Romtelecom's space - monthly fee    | TREATED<br>SEPARATELY |
| 20 | Administration fee for cascade payment in the transit arrangements                         | TREATED<br>SEPARATELY |
| 21 | Leased Lines   | TREATED<br>SEPARATELY |

Source: TERA Consultants

These results do not include any overhead costs, as explained by ANCOM in the conceptual framework.

Six other services need to be “costed” separately:

- Costs related to leased lines are made of 3 parts: one-off fees (connection, disconnection or reconfiguration of the IC link) already treated above, access network costs and core network costs. These latter costs will be used in the upcoming pricing decision to set leased lines monthly rental charges. Access network costs will be taken from the access network cost model already developed by ANCOM while core network costs will be taken from the core network cost model developed in parallel to the PoI model. Costs of the fixed core model refer to both E1 and STM 1 capacities and will reflect the costs of the interconnection links passing through the transmission network.
- Connecting the equipments of 2 operators collocated in Romtelecom's space - monthly fee is extremely low (6 €cts per month). It does not seem relevant to assess the rationale for the level of this cost. No cost data has been provided by Romtelecom;
- Administration fee for cascade payment in the transit arrangements have been reviewed by ANCOM in 2009 (decision 982 of 2009). This decision gives a

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2009 cost of €73 for this ancillary interconnection service, which updated to 2012 circumstances results in €72/operator/month. This cost includes cost of new procedures, cost of bad debt and cost of software (which is the main update compared to 2009);

- Monthly rent of port in the switch should include maintenance and depreciation of ports and depreciation of port costs and amounts to €37 per month for E1 and €331 per month for STM1 (see section 2.3)<sup>8</sup>;
- The price of the services “Installation of transmission equipment” and “Removal of transmission equipment” is obtained by multiplying the time necessary to provide the services which should be estimated on a case by case basis as explained in §1 and a cost per hour of €16.3/hour. This cost per hour is the average cost per working hour for this type of work based on labour cost of the different operators as explained in §2.2.

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<sup>8</sup> For monthly rent of the port and administration fee for cascade payment in the transit arrangements, the cost of capital needs to be taken into account. A rate of 11.1% has been used, in accordance with the conceptual framework

#### **4 Annex 1: Data provided by operators**

The table below specifies for each ancillary interconnection service which type of data was provided by each operator:

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**Figure 4 – Type of data provided per ancillary interconnection service and per operator**

| List of tasks   | RomTelecom |          |           | Vodafone |          |           | Orange |          |           | Cosmote |          |           | UPC   |          |           | RCS&RDS |          |           |
|---|------------|----------|-----------|----------|----------|-----------|--------|----------|-----------|---------|----------|-----------|-------|----------|-----------|---------|----------|-----------|
|   | Tasks      | Length h | Unit cost | Tasks    | Length h | Unit cost | Tasks  | Length h | Unit cost | Tasks   | Length h | Unit cost | Tasks | Length h | Unit cost | Tasks   | Length h | Unit cost |
| Configuration of partner in PoA/PoI   |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Reconfiguration of partner in PoA/PoI   |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Removal of partner in PoA/PoI   |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Installation of port in the switch  |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Reconfiguration of port in the switch   |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Removal of port from the switch   |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Monthly rent of port in the switch  |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Other reconfiguration operations - for the 1st circuit  |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Other reconfiguration operations - for each of the other circuits in the same reconfiguration operation |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Installation of transmission equipment  |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Removal of transmission equipment   |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Installation of 2 Mbps interface  |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Removal of 2 Mbps interface   |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Installation of STM1 port   |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Removal of STM1 port  |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Installation of STM1 transmission equipment   |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Removal of STM1 transmission equipment  |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Installation of STM1 interface  |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Removal of STM1 interface   |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Capacity reservation  |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Unplanned capacity order  |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Modification of capacity order  |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Reconnect a suspended service   |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Connecting the equipments of 2 operators collocated in Romtelecom's space - connection fee              |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Connecting the equipments of 2 operators collocated in Romtelecom's space - monthly fee                 |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |
| Administration fee for cascade payment in the transit arrangements                                      |            |          |           |          |          |           |        |          |           |         |          |           |       |          |           |         |          |           |

Source : TERA Consultants

It is to be noted that during public consultation additional data was provided by operators:

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- On labour costs (Orange),
- On task duration (Vodafone, Cosmote),
- On protection mechanism for interconnection at the switching and at the transmission levels (all operators),
- On material costs (Vodafone).

## 5 Annex 2: Assessment of time required to provide ancillary interconnection services

To assess the time required to provide ancillary interconnection services, it is necessary to split ancillary interconnection services into corresponding tasks. During the data collection process, ANCOM requested operators to provide a list of tasks to be carried out to provide ancillary interconnection services. Some operators provided such a list, with different level of details. One operator in particular provided a high level of details which split ancillary interconnection service provision into several elementary tasks. Another operator, in response to the consultation on the PoI model, provided statistical data on the average time observed for the provision of services in the past. For some services, the list of task has been set considering past ANCOM's decision (see below).

Then, for these tasks, it is possible to assess the corresponding duration:

- By relying on ANCOM's previous decisions: decision no. 15/2011 and decision 244 of 2008 which give duration inputs for the following services:
  - Installation of 2 Mbps interface,
  - Removal of 2 Mbps interface,
  - Other reconfiguration operations - for the 1st circuit,
  - Other reconfiguration operations - for each of the other circuits in the same reconfiguration operation.
- By using expert opinions. Three different experts have been interviewed on this subject (two Romanian which mainly gave indications on tests, one in UK). Expert opinion has been also used to review the duration of interoperability tests that was assumed in ANCOM's previous decision on Other reconfiguration operations - for the 1st circuit and Other reconfiguration operations - for each of the other circuits in the same reconfiguration operation services;
- By using reasonable estimates for basic tasks for which durations provided by operators do not seem reasonable. Some of these basic tasks have been based on the 2010 access network cost model developed by ANCOM such as the tasks consisting in forwarding information from an operator department to another department or updating a database;
- By using data provided by operators for tasks that are very specific and therefore for which task duration cannot be assessed without the data from operators.
- By fine tuning task durations by comparing the results of the assessment with the statistical data about the average time duration of one service provided by one operator.

To carry out this assessment, following facts have been taken into accounts:

- “removal” services require less time than “installation” services. They are generally performed under a software interface where the equipment is shut down (for example, “removal of partner in PoA/PoI” and “removal of port in the switch”, where the port stays on the switch).
- For the preparation of a solution for the service “configuration of partner in PoA/PoI”, operators have already indicated their PoA/PoI where interconnection is possible and the solution are in principle pre-defined by the large operators. There is not much room to design unique solutions from scratch.
- For tests related to the service “configuration of partner in PoA/PoI”, they are run automatically. 3 types of tests are carried out: access related, softswitch tests and billing (numbering, policies, rules. etc). Some of them can be performed simultaneously (softswitch & billing). However, it is to be noted that, if the precise equipment settings are clearly indicated in the technical annexes to the interconnection contract, there is no need to carry out softswitch tests. Configuration tests should normally take 3-4 hours. Billing tests should take 2 hours<sup>11</sup>.
- Also, when a test is carried out, if it lasts x hours, engineers do not need to spend x hours testing but can perform other tasks in parallel. As a consequence, a percentage of 50% is applied to test durations to reflect time spent by engineers.
- For testing ports, this should take less than one hour as most of the tests have already been performed under configuration of PoA/PoI.
- Physical connections should not last more than 1 hour.

The following table summarizes and lists the assumptions taken to assess the time required for each elementary task identified.

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<sup>11</sup> ANCOM's decision 244 of 2008 gives a duration for billing tests of 3 hours ('checking the billing' and 'analysing the tests results')

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**Figure 5 – Assumptions used for tasks duration**

| Tasks  | Duration assumption<br>(minutes) - Final model<br>(experts and operators<br>feedback) |
|--|---|
| Sending information  | 10  |
| Preparing a draft solution   | 240   |
| Reviewing the solution   | 180   |
| Paperwork (work orders, etc.)  | 150   |
| Updating an IT system or database or updating it   | 30  |
| Testing port   | 60  |
| Realising a physical connection  | 60  |
| Carrying out tests and analysing tests   | 240   |
| Installing interface   | 20  |
| Configuring and testing interface  | 120   |
| Interface uninstallation   | 45  |
| Implementing OLO numbering and services  | 90  |
| Technical department perform work order to unblock technical solution                            | 120   |
| Technical department monitor the routed traffic from OLO   | 210   |
| Billing tests  | 120   |
| Reconfiguration activities for switching resources   | 150   |
| Testing and maintaining the port (minutes per one month)   | 60  |
| Technical department eliminate the connection of 2 Mbps links ( incl software changes)           | 120   |
| Technical department verify availability of resources ( switching, transmission, infrastructure) | 60  |
| Technical department configure the removal of voice network ( voice routes, voice instalment)    | 30  |

Source: TERA Consultants

Tables below detail the estimates per service:

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**Figure 6 – Time required per service as assessed by TERA Consultants**

| Type of service   | Unit    | Time spent  |
|---|---------|-------------|
| <b>Configuration of partner in PoA/PoI</b>  |         | <b>35,0</b> |
| <b>Requested information from OLO</b>   |         |             |
| 1. Wholesale department sends OLO request to technical department   | Minutes | 10,0        |
| 2. Technical department analyse request, issues draft solution based on actual technical conditions & request additional info - signal  | Minutes | 240,0       |
| 3. Technical department sends draft solutions to Wholesale department ( together with new request for additional info - signaling, prot | Minutes | 10,0        |
| 4. Wholesale department informs OLO and request additional information ( signaling , protocols for estimated traffic etc)               | Minutes | 10,0        |
| 5. Wholesale department sent additional information from OLO to technical department  | Minutes | 10,0        |
| 6. Technical department verifies additional request & issues final proposed technical solution  | Minutes | 180,0       |
| 7. Technical department sends final proposed technical solutions to Wholesale department  | Minutes | 10,0        |
| 8. Wholesale department informs OLO and requests confirmation for final proposed technical solution ( incl. negotiations for technic    | Minutes | 10,0        |
| <b>Planning of final technical solution</b>   |         |             |
| 1. Technical department verify availability of resources ( switching, transmission, infrastructure)                                     | Minutes | 60,0        |
| 2. Technical department perform Data/Digital Line request (paperwork)   | Minutes | 150,0       |
| 3. Technical department perform reconfiguration activities for switching resources (DLR+reconfiguration solution+ERICSSON)              | Minutes | 150,0       |
| 4. Technical department perform technical solution file   | Minutes | 150,0       |
| 5. Update of technical database   | Minutes | 30,0        |
| <b>Network configuration</b>  |         |             |
| 1. Technical department perform physical connections for signaling circuits   | Minutes | 60,0        |
| 2. Technical department perform software update for signalling circuits ( create new routes and new SS7 link etc)                       | Minutes | 30,0        |
| 3. Technical department perform the connection of 2 Mbps links  | Minutes | 60,0        |
| 4. Technical department configure the voice network ( voice routes, voice instalment)   | Minutes | 30,0        |
| 5. Technical department implement OLO numbering and services  | Minutes | 90,0        |
| <b>Network configuration tests</b>  |         |             |
| 1. Technical department plan required technical test & validate the schedule with OLO   | Minutes | 60,0        |
| 2. Technical department carry out tests   | Minutes | 240,0       |
| 3. Wholesale department inform OLO & request confirmation   | Minutes | 10,0        |
| 4. Wholesale department sent OLO confirmation to technical department   | Minutes | 10,0        |
| 5. Technical department block agreed resources for interconnection with OLO   | Minutes | 10,0        |
| <b>Acceptance/Implementation on technical solution</b>  |         |             |
| 1. Wholesale department implements interconnection agreements in the billing software   | Minutes | 30,0        |
| 2. Wholesale department performs billing tests and sends request to unblock the technical solution                                      | Minutes | 120,0       |
| 3. Technical department perform OS to unblock technical solution  | Minutes | 120,0       |
| 4. Technical department monitor the routed traffic from OLO   | Minutes | 210,0       |
| TOTAL HOURS   | Hours   | <b>35,0</b> |
| <b>Reconfiguration of partner in PoA/PoI</b>  |         | <b>35,0</b> |
| Same as above   | Minutes | 2 100,0     |
| TOTAL HOURS   | Hours   | <b>35,0</b> |
| <b>Removal of partner in PoA/PoI</b>  |         | <b>11,7</b> |
| <b>Requested information from OLO</b>   |         |             |
| 1. Wholesale department sends OLO request to technical department   | Minutes | 10,0        |
| 2. Technical department perform work order and Data/Digital Line request (paperwork)  |         | 150,0       |
| <b>Planning of final technical solution</b>   |         |             |
| 1. Update of technical database   | Minutes | 30,0        |
| <b>Network configuration</b>  |         |             |
| 1. Update of technical database   | Minutes | 240,0       |
| <b>Acceptance/Implementation on technical solution</b>  |         |             |
| 1. Update of technical database   | Minutes | 270,0       |
| TOTAL HOURS   | Hours   | <b>11,7</b> |
| <b>Installation of port in the switch</b>   |         | <b>17,5</b> |
| <b>Analysis of requested information from OLO</b>   |         |             |
| 1. Wholesale department sends OLO request to technical department   | Minutes | 10,0        |
| 2. Technical department verifies request & check available resources at switch level  | Minutes | 30,0        |
| 3. Technical department perform Data/Digital Line request (paperwork)   | Minutes | 150,0       |
| 4. Technical department perform reconfiguration activities for switching resources (DLR+reconfiguration solution+ERICSSON)              | Minutes | 150,0       |
| 5. Update of technical database   | Minutes | 30,0        |
| 6. Technical department perform the connection of 2 Mbps links  | Minutes | 60,0        |
| 7. Technical department configure the voice network ( voice routes, voice instalment)   | Minutes | 30,0        |
| <b>Network configuration tests</b>  |         |             |
| 1. Technical department perform testing (level 1) - traffic tests, signalling tests etc ( incl tests for ITU-T parameter)               | Minutes | 60,0        |
| 2. Wholesale department inform OLO & request confirmation   | Minutes | 10,0        |
| 3. Wholesale department sent OLO confirmation to technical department   | Minutes | 10,0        |
| 4. technical department block agreed resources for interconnection with OLO   | Minutes | 30,0        |
| <b>Acceptance/Implementation on technical solution</b>  |         |             |
| 1. Wholesale department implements interconnection agreements in the billing software   | Minutes | 30,0        |
| 2. Wholesale department performs billing tests and sends request to unblock the technical solution                                      | Minutes | 120,0       |
| 3. Technical department perform OS to unblock technical solution  | Minutes | 120,0       |
| 4. Technical department monitor the routed traffic from OLO   | Minutes | 210,0       |
| TOTAL HOURS   | Hours   | <b>17,5</b> |
| <b>Reconfiguration of port in the switch</b>  |         | <b>16,5</b> |
| Same as above without connection  | Minutes | 990,0       |
| TOTAL HOURS   | Hours   | <b>16,5</b> |
| <b>Removal of port from the switch</b>  |         | <b>6,5</b>  |
| 1. Wholesale department sends OLO request to technical department   | Minutes | 10,0        |
| 2. Technical department perform work order and Data/Digital Line request (paperwork)  | Minutes | 150,0       |
| 3. Update of technical database   | Minutes | 30,0        |
| 4. Technical department eliminate the connection of 2 Mbps links ( incl software changes)   | Minutes | 120,0       |
| 5. Technical department configure the removal of voice network ( voice routes, voice instalment)  | Minutes | 30,0        |
| 6. Technical department informs Wholesale department about removal of ports   | Minutes | 10,0        |
| 7. Wholesale department inform OLO & request confirmation   | Minutes | 10,0        |
| 8. Wholesale department implements interconnection agreements in the billing software   | Minutes | 30,0        |
| TOTAL HOURS   | Hours   | <b>6,5</b>  |

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|   |         |             |
|---|---------|-------------|
| <b>Monthly rent of port in the switch</b>   |         | <b>1,0</b>  |
| 1. Testing and maintaining the port (minutes per one month)   | Minutes | 60,0        |
| <b>TOTAL HOURS</b>  | Hours   | <b>1,0</b>  |
| <b>Other reconfiguration operations - for the 1st circuit</b>   |         | <b>24,0</b> |
| <b>Analysis of requested information from OLO</b>   |         |             |
| 1. Agreement of the plan with OLO: defining the testing configuration, the set of tests, and agreement on the timeline of the process.      | Minutes | 120,0       |
| 2. Development of the technical interconnection solution  | Minutes | 180,0       |
| 3. Reservation of resources   | Minutes | 60,0        |
| 4. Setting the technical solution for transmission  | Minutes | 60,0        |
| <b>Network configuration tests</b>  |         |             |
| 1. Setting-up the testing configuration in Romtelecom's network (voice circuits, introduction of SPC codes, signalling links)               | Minutes | 90,0        |
| 2. Changes in the database in the switching network of Romtelecom   | Minutes | 300,0       |
| 3. Interoperability tests excluding billing and issuing the interoperability test certificate   | Minutes | 240,0       |
| <b>Acceptance/Implementation on technical solution</b>  |         |             |
| 1. Changes in the billing systems in order to introduce the new voice circuits  | Minutes | 120,0       |
| 2. Billing tests and results analysis   | Minutes | 120,0       |
| 3. Activation of the new routes and destination codes in the elements of Romtelecom's exchange network identified at point 2.2 (includ      | Minutes | 60,0        |
| 4. Activation of the new signalling link-set and changing signalling routing for the traffic that is re-oriented in the SA STP nodes of Rom | Minutes | 30,0        |
| 5. Moving (re-orientation) of the commercial traffic on the new PAs in OLO's network by voice circuits /CIC reconfiguration on the ne       | Minutes | 30,0        |
| 6. Deleting the elements corresponding to voice and signalling links that are re-oriented from Romtelecom's databases: voice circuits       | Minutes | 30,0        |
| <b>TOTAL HOURS</b>  | Hours   | <b>24,0</b> |
| <b>Other reconfiguration operations - for each of the other circuits in the same reconfiguration operation</b>                              |         | <b>4,9</b>  |
| <b>Analysis of requested information from OLO</b>   |         |             |
| 1. Wholesale department sends OLO request to technical department   | Minutes | 10,0        |
| <b>Network configuration tests</b>  |         |             |
| 1. Setting-up the testing configuration in Romtelecom's network - define CICs on new voice circuits   | Minutes | 15,0        |
| 2. Changes in the database and in the switching network of Romtelecom   | Minutes | 30,0        |
| 3. Interoperability tests excluding billing (transmission only)   | Minutes | 240,0       |
| <b>TOTAL HOURS</b>  | Hours   | <b>4,9</b>  |
| <b>Installation of transmission equipment</b>   |         |             |
| No detailed tasks available and consistent  |         |             |
| <b>Removal of transmission equipment</b>  |         |             |
| No detailed tasks available and consistent  |         |             |
| <b>Connection charge for the IC link</b>  |         | <b>5,7</b>  |
| 1. Wholesale department request configuration to technical departments  | Minutes | 10,0        |
| 2. Technical department perform work order and Data/Digital Line request (paperwork)  | Minutes | 150,0       |
| 3. Update of technical database   | Minutes | 30,0        |
| 4. Interface installation in existing equipment / Identify technical availability on equipment  | Minutes | 20,0        |
| 5. Interface configuration and testing  | Minutes | 120,0       |
| 6. Technical department sends wholesale the results and to the OLO  | Minutes | 10,0        |
| <b>TOTAL HOURS</b>  | Hours   | <b>5,7</b>  |
| <b>Reconfiguration charge for the IC link</b>   |         | <b>5,3</b>  |
| 1. Wholesale department request configuration to technical departments  | Minutes | 10,0        |
| 2. Technical department perform work order and Data/Digital Line request (paperwork)  | Minutes | 150,0       |
| 3. Update of technical database   | Minutes | 30,0        |
| 4. Interface reconfiguration and testing  | Minutes | 120,0       |
| 5. Technical department sends wholesale the results and to the OLO  | Minutes | 10,0        |
| <b>TOTAL HOURS</b>  | Hours   | <b>5,3</b>  |
| <b>Disconnection charge for the IC link</b>   |         | <b>4,1</b>  |
| 1. Wholesale department request configuration to technical departments  | Minutes | 10,0        |
| 2. Technical department perform work order and Data/Digital Line request (paperwork)  | Minutes | 150,0       |
| 3. Update of technical database   | Minutes | 30,0        |
| 4. Interface uninstallation in existing equipment   | Minutes | 45,0        |
| 5. Technical department sends wholesale the results and to the OLO  | Minutes | 10,0        |
| <b>TOTAL HOURS</b>  | Hours   | <b>4,1</b>  |
| <b>Increase of capacity order</b>   |         | <b>23,8</b> |
| <b>Analysis of requested information from OLO</b>   |         |             |
| 1. Wholesale department sends OLO request to technical department   | Minutes | 10,0        |
| 2. Technical department verifies request & check available resources ( switching, transmission, infrastructure)                             | Minutes | 30,0        |
| 3. Technical department perform work order and Data/Digital Line request (paperwork)  | Minutes | 150,0       |
| 4. Technical department perform reconfiguration activities for switching resources (DLR+reconfiguration solution+ERICSSON)                  | Minutes | 150,0       |
| 5. Update of technical database   | Minutes | 30,0        |
| <b>Network configuration</b>  |         |             |
| 1. Technical department perform physical connections for signalling circuits  | Minutes | 60,0        |
| 2. Technical department perform software update for signalling circuits ( create new routes and new SS7 link etc)                           | Minutes | 30,0        |
| 3. Technical department perform the connection of links   | Minutes | 60,0        |
| 4. Technical department configure the voice network ( voice routes, voice instalment)   | Minutes | 30,0        |
| 5. Technical department implement OLO numbering and services  | Minutes | 90,0        |
| <b>Network configuration tests</b>  |         |             |
| 1. Technical department plan required technical test & validate the schedule with OLO   | Minutes | 10,0        |
| 2. Technical department perform tests and analysing tests   | Minutes | 240,0       |
| 3. Wholesale department inform OLO & request confirmation   | Minutes | 10,0        |
| 4. Wholesale department sent OLO confirmation to technical department   | Minutes | 10,0        |
| 5. Technical department block agreed resources for interconnection with OLO   | Minutes | 30,0        |
| 6. Technical department inform Wholesale department about modification of capacity order  | Minutes | 10,0        |
| <b>Acceptance/Implementation on technical solution</b>  |         |             |
| 1. Wholesale department implements interconnection agreements in the billing software   | Minutes | 30,0        |
| 2. Wholesale department request IT billing confirmation and sends request to unblock the technical solution                                 | Minutes | 120,0       |
| 3. Technical department perform OS to unblock technical solution  | Minutes | 120,0       |
| 4. Technical department monitor the routed traffic from OLO   | Minutes | 210,0       |
| <b>TOTAL HOURS</b>  | Hours   | <b>23,8</b> |

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|  |         |             |
|--|---------|-------------|
| <b>Decrease of capacity order</b>  |         | <b>13,2</b> |
| <b>Analysis of requested information from OLO</b>  |         |             |
| 1. Wholesale department sends OLO request to technical department  | Minutes | 10,0        |
| 2. Technical department perform reconfiguration activities for switching resources (DLR+reconfiguration solution+ERICSSON) | Minutes | 150,0       |
| 3. Update of technical database  | Minutes | 30,0        |
| <b>Network configuration</b>   |         |             |
| 1. Technical department perform physical disconnections for signaling circuits   | Minutes | 60,0        |
| 3. Technical department perform the disconnection of 2 Mbps links  | Minutes | 60,0        |
| <b>Acceptance/Implementation on technical solution</b>   |         |             |
| 1. Wholesale department implements interconnection agreements in the billing software                                      | Minutes | 30,0        |
| 2. Wholesale department request IT billing confirmation and sends request to unblock the technical solution                | Minutes | 120,0       |
| 3. Technical department perform OS to unblock technical solution   | Minutes | 120,0       |
| 4. Technical department monitor the routed traffic from OLO  | Minutes | 210,0       |
| TOTAL HOURS  | Hours   | <b>13,2</b> |
| <b>Reconnect a suspended service</b>   |         |             |
| No detailed tasks available  |         |             |
| <b>Connecting the equipments of 2 operators collocated in Romtelecom's space - connection fee</b>                          |         | <b>12,8</b> |
| <b>Analysis of requested information from OLO</b>  |         |             |
| 1. Wholesale department sends OLO request to technical department  | Minutes | 10,0        |
| 2. Technical department perform work order and Data/Digital Line request (paperwork)                                       | Minutes | 150,0       |
| 3. Technical department perform technical solution file  | Minutes | 150,0       |
| 4. Update of technical database  | Minutes | 30,0        |
| <b>Network configuration</b>   |         |             |
| 1. Technical department perform physical connections for signaling circuits  | Minutes | 60,0        |
| 2. Technical department perform software update for signalling circuits ( create new routes and new SS7 link etc)          | Minutes | 30,0        |
| 3. Technical department perform the connection of 2 Mbps links   | Minutes | 60,0        |
| 4. Technical department configure the voice network ( voice routes, voice instalment)                                      | Minutes | 30,0        |
| <b>Network configuration tests</b>   |         |             |
| 1. Technical department perform compatibility tests and analyse tests  | Minutes | 240,0       |
| 2. Wholesale department inform OLO & request confirmation  | Minutes | 10,0        |
| TOTAL HOURS  | Hours   | <b>12,8</b> |

Source : TERA Consultants

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