

Fra: frode.lillebakken@telia.no
Til: [Vollstad, Inger](#)
Emne: RE: Oppdatering av LRIC modell for mobilterminering
Dato: 22. desember 2016 10:56:19
Vedlegg: [image001.png](#)
[image002.png](#)

Hei Inger,

Telia er av den oppfatning at dere bør benytte LRIC modell v8 uten ytterligere endringer, dvs alternativ 1. LRIC modell er komplisert og gitt den begrensede betydning dette nå har, bør både aktørene og NKOM bruke minst mulig tid og ressurser på ytterligere LRIC oppdateringer.

Vi ser videre at nye tjenester på IMS/4G bør diskuteres i tilknytning til termineringsregimet, slik at det er tydelig for aktørene hvordan dette blir håndtert. Vi blir gjerne med i slike diskusjoner.

For ordens skyld vedlegges Telia Company sine synspunkter knyttet til forslaget i det nye rammeverket vedr termineringspriser.

Termination rates

There is still significant imbalance between the lowest Mobile Termination Rate (MTR) and highest, the same with Fixed Termination Rate (FTR) across EU. This has resulted in scenarios where operators with their principal business in countries with low MTR's have no possibility to use reciprocal tariffs for calls terminating in countries with high MTR's. This obviously contributes to negative effects on trade since it removes a level playing field. This will become even more evident when Roam-like-at-Home comes into force in June 2017. Large telecommunication groups will, to an even larger extent then be able to use this imbalance to their advantage which will also have a distorting effect on national competition. While such a negative effect on national markets (using the surplus from their high MTR's compared with others' low MTR's) may benefit end-users in the short term in the long term it would hamper fair competition with customers suffering as a result.

The bottom-up modelling using long-run incremental (LRIC) model has proven to be extremely difficult to apply, with each review of the MTR and FTR levels entailing the utilization of vast resources at both NRA's and operators. Additionally the number of national appeals and court cases across Europe that have led to revised national MTR and FTR levels (compared to those originally declared by the NRA's) is also evidence of the model's limitations. The final decision has sometimes been reached years after NRA's declared the original levels.

Based the on above Telia Company believes that the Commission's proposal is not satisfactory, it will not achieve any improvements to the termination regulation; not only will there be continuous problems with applying the LRIC model, the maximum MTR and FTR levels outlined in Article 73.2 will not at all overcome the problem of great difference between low and high levels applied, which we currently struggle with. Telia Company is of the opinion that the only means to ensure future-proof termination regulation, which will mitigate the current risk of competition distortion as well limit issues foreseen when Roam-Like-At-Home comes into force, is to apply one regulated MTR and FTR respectively on EU level. The method of establishing the levels should be equivalent to agreeing on wholesale caps for roaming.

Med vennlig hilsen/ Best regards,

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Subject: Oppdatering av LRIC modell for mobilterminering

Til representanter for fastnettoperatører

Nkom har foretatt en vurdering av hvordan LRIC modellen som benyttes som grunnlag for fastsetting av termineringspriser i mobilmarkedene bør oppdateres, før det fattes nye vedtak. Operatører som er utpekt med SMP i mobiltermineringsmarkedene er invitert til å gi innspill på Nkoms vurderinger.

Nkom ønsker i tillegg å få vite om fastnettoperatørene har kommentarer til Nkoms vurderinger.

Vedlagt følger brev som er sendt mobiloperatører. Vi ber om innspill fra fastnettoperatører innen 20. desember 2016.

Med vennlig hilsen

Inger Vollstad

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