

Ref No: BM/18052

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For Attention: Mr. Gumani Malebusha

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Dear Sir

## **COMMENTS: END-USER AND SUBSCRIBER SERVICE CHARTER REGULATIONS**

1. Transnet SOC Ltd ("Transnet") wishes to express its appreciation for being afforded the opportunity to comment on the End-User and Subscriber Service Charter Regulations (hereinafter referred to as "the Draft Regulations") published in Government Gazette No 37251.

### **General Comments**

2. The Draft Regulations omitted to provide critical definitions, which might create ambiguity and challenges in interpretation of these Draft Regulations. It is therefore recommended that the following terms or phrases be defined:
  - Data packets
  - Activation
  - Mean Opinion Score Scale
  - RxLev
  - Test route
  - Packet
  - Billing cycle
3. The Draft Regulations are silent on critical issues and we believe more information or provisions should be made on the following:
  - 3.1 Voice message services;
  - 3.2 Standard for lag in time of message sent to time of message delivered considering that SMS messaging is measured on average transmission success ratio;

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- 3.3 Standard for End-user costs associated with the minimum requirements required by operators, such as caller line identity and itemised billing costs; and
- 3.4 On internet connections that are lost or interrupted during data downloads, where the End-user consumes data during the download but has to reconnect and re-download.

### **Specified Comments**

#### **Clause 5(iii)**

- 4. According to the provisions of this clause, whilst it provides that, end-users should be provided an opt-in service relating to international roaming, it is recommended that the licensees should also provide an opt-out service.

#### **Clause 8.1**

- 5. In respect of the complaints procedures provided for in this clause, it is recommended that licensees be provided with options to respond either in writing or through telephonic communication instead of mandatory means of responding provided.

#### **Clause 13**

- 6. This Clause relating to service upgrades requires clarity as headings to the table are missing.
- 7. We thank you for this opportunity to comment on the Draft Regulations. We trust that our submission will assist.

Kind regards



**Brian Molefe**

Group Chief Executive

Date: 24.2.14.

Cc: Mr. Tshediso Matona  
Director General: Department of Public Enterprises