

Response to ECTEL's Guidelines for Pricing of Access to Facilities in the ECTEL Member States

NTRC Grenada submits its comments to support the implementation of Telecommunications (Access to Facilities) Regulation that is fair to both the Owner of the facility (Provider providing access to the facility) and the Provider receiving access, where all cost associated with the facility should be fairly distributed among all the users of the facility.

Given that the proposed equation is based on long term sharing of the facility, with the cost of the infrastructure spread out over the useful life of the facility, we are proposing that the rate of access must ensure that the Provider receiving access should contribute fairly to all cost and should include the sharing of the risk as it relates to the short term use of the passive facility.

It will be an unfair solution to allow for equal sharing based entirely on cost where a limited time sharing is required. The rate for limited time sharing of a facility requires more than just the cost of the facility; it must also include cost associated with risk factor (risk of the investment) and the return on the investment.

In this regard, for determination of the rate of access, NTRC Grenada is therefore proposing two possible solutions to be applied:

1. For limited time, equivalent sharing of cost plus mark-up to compensate for Return on Investment and / or risk factor
2. Equivalent sharing of cost over the remaining life of the facility

NTRC agrees to the proposed policies:

- To promote the efficient deployment of networks
- To lessen the impact of ICT on the environment

We also agree that the present legislation provides for a Telecommunications (access to Facilities) Regulation and anticipates a receipt of the said regulations soon.