



Federated States of Micronesia  
Telecommunication Regulation Authority

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September 27, 2021

Mr. Jacques Samuel  
P.O. Box 1491  
Kolonia, Pohnpei  
FM 96941

Dear Mr. Mr. Samuel:

As per our letter of August 20<sup>th</sup>, 2021 the TRA recently held a public conference on bottleneck facilities. A summary of the messages from attendees, and matters raised by the TRA, that emerged in the discussion that are relevant to progressing TRA's thinking on whether particular fiber optic communications facilities should be declared bottleneck facilities was attached to that letter. In that letter, we also sought additional information from you for the purposes of our decision-making and, if appropriate, our draft determination on whether, and to what extent, fiber optic communications facilities are bottleneck facilities for the purposes of the Act. While other licensees have responded to that information request, we note that you have not. We would appreciate your response to that letter as soon as possible.

Furthermore, in order to progress the TRA's work on whether particular fiber optic communications facilities should be declared bottleneck facilities, the TRA requires the following additional specific information on the minimum standards and unit costs of providing services that your organization has achieved, or is planning to achieve, using your satellite facilities, which some parties have argued could be considered a substitute for fiber facilities.

Pursuant to our powers under section 379 of the Telecommunications Act 2014 (*Requirement to supply information or documents or give evidence*), we require that you provide the following information. We will use the information in deciding whether, and to what extent, fiber optic communications facilities are bottleneck facilities for the purposes of the Act. For ease of collating the responses, Appendix 1 provides a response template that we would appreciate you filling out. We will also provide the template in the form of an excel file, and would appreciate you submitting your response electronically if possible.

**Minimum standard of service**

1. Please indicate the minimum standard of service that you are currently achieving or plan to sustainably achieve (whichever is superior) for approximately 99% (or other percentage as indicated by you) for the telecommunications services that you are providing or receiving. Please provide at least:
  - a. the upload speed on the connection

- b. the download speed on the connection
- c. the latency on the connection
- d. the jitter on the connection
- e. the availability of the connection in terms of percentage of time the connection is available and achieving the indicated speeds and latency in a typical year,

for each of the following services if they are relevant to you (you either supply these services or purchase them in order to enable you to supply telecommunications services to customers):

- a. Satellite backhaul services to enable internet traffic to flow to and from FSM and between islands in the FSM
- b. Submarine backhaul fiber services to enable internet traffic to flow to and from FSM and between islands in the FSM
- c. Fiber to the Premise (FTTP) broadband services for a typical household or small business
- d. Fixed Wireless broadband for a typical household or small business
- e. Satellite to customer services for a typical household or small business
- f. Digital Subscriber Line (DSL) broadband services using copper wires for a typical household or small business

We expect that, at a minimum, the above items a and e would be applicable for your organization.

To the extent that targeted or achievable service levels for each service materially differ by geographic area within FSM, please provide the above information broken down by relevant geographic area and an explanation of what causes the material difference in service levels. To do this, please insert additional rows where relevant in the response template and specify the relevant geographic location.

### **Unit costs and average revenues**

2. For the services that you included in your answer to Question 1 please provide the approximate unit cost you are paying or plan to pay your suppliers (if you are purchasing the service), or the average revenues you are earning or plan to earn from your customers (if you are selling the service) as follows:
  - a. for satellite backhaul services, please provide the unit cost or average revenue per Gbps per month
  - b. for submarine backhaul fiber services, please provide the unit cost or average revenue per Gbps per month
  - c. for FTTP services, please provide the unit cost or average revenue per connection per month
  - d. for Fixed Wireless services (if relevant)

- e. for satellite to customer services please provide the unit cost or average revenue per connection per month
- f. for DSL services please provide the unit cost or average revenue per connection per month

Please identify whether your customers are or will be other licensees or retail end-users. If you supply or plan to supply services to both, report your prices or proposed prices to each separately.

To the extent that the unit costs or average revenues for each service materially differ by geographic area within FSM, please provide the above information broken down by relevant geographic area and an explanation of what causes the material difference in cost or revenue levels. To do this, please insert additional rows where relevant in the response template and specify the relevant geographic location.

Please respond **by no later than 5pm October 15th, 2021.**

When responding to the above questions, please indicate whether and explain in detail why you consider any of the information to be “sensitive information” as defined in section 322 of the Act. We may publish some or all of your answers to the questions, unless it is “sensitive information.”

Sincerely,



Takuro Akinaga  
Chief Executive

**APPENDIX 1: Response Template**

<b>Relevant Technology</b>	<b>Geography</b> (State “FSM-wide”, or add rows and specify area)	<b>Question (unit of answer)</b>	<b>Response (N/A if not applicable)</b>
a. Satellite Backhaul		1.a Upload speed (Gbps)	
		1.b Download speed (Gbps)	
		1.c Latency (milliseconds)	
		1.d Jitter (milliseconds)	
		1.e Availability (% of year)	
		2.a Unit cost or average revenue (\$/Gbps/month)	
b. Submarine Backhaul		1.a Upload speed (Gbps)	
		1.b Download speed (Gbps)	
		1.c Latency (milliseconds)	
		1.d Jitter (milliseconds)	
		1.e Availability (% of year)	
		2.b Unit cost or average revenue (\$/Gbps/month)	
c. FTTP		1.a Upload speed (Gbps)	
		1.b Download speed (Gbps)	
		1.c Latency (milliseconds)	
		1.d Jitter (milliseconds)	
		1.e Availability (% of year)	
		2.c Unit cost or average revenue (\$/connection/month)	
d. Fixed Wireless		1.a Upload speed (Gbps)	
		1.b Download speed (Gbps)	
		1.c Latency (milliseconds)	
		1.d Jitter (milliseconds)	
		1.e Availability (% of year)	

		2.d Unit cost or average revenue (\$/connection/month)	
e. Satellite to customer		1.a Upload speed (Gbps)	
		1.b Download speed (Gbps)	
		1.c Latency (milliseconds)	
		1.d Jitter (milliseconds)	
		1.e Availability (% of year)	
		2.e Unit cost or average revenue (\$/connection/month)	
f. DSL		1.a Upload speed (Gbps)	
		1.b Download speed (Gbps)	
		1.c Latency (milliseconds)	
		1.d Jitter (milliseconds)	
		1.e Availability (% of year)	
		2.f Unit cost or average revenue (\$/connection/month)	