
Telecommunications Billing Guidelines

Summary of the Comments

Submitted in Response to ictQATAR's Questionnaire

The Supreme Council of Information & Communication Technology "ictQATAR"

25 January 2009

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ANNEX A: QTEL'S RESPONSE to ictQATAR'S PROPOSED TELECOMMUNICATION BILLING GUIDELINES

I. Introduction

ictQATAR received 68 responses to its public consultation regarding proposed guidelines for telecommunications billing practices. This is the largest number of responses it has received to date to a public consultation. This document contains the statistical summary of all responses that were submitted using ictQATAR's comment submission form which was in a questionnaire format. The only respondent that chose to use its own format is Qtel whose response can be found attached to this document for your reference or at www.ict.gov.qa.

In addition to responses from a major international bank and petroleum company, the majority of responses were submitted by individuals. ictQATAR has kept the names of all of respondents confidential.

The 10 billing guidelines proposed in ictQATAR's public consultation (ICTRA 04/08-PA) are intended to set minimum billing standards for Service Providers in Qatar so that customers of telecommunications services may be assured of receiving a standard level of fair billing practices.

2. Overall Summary of responses

The majority (95%) of all respondents agreed with the contents of ictQATAR's billing guidelines as proposed. Approximately 2% (1.9%) disagreed with some aspects of the proposals. Another 2.5% were undecided about certain aspects of the proposals.

Respondents generally commented that the document was easy to read and that the proposals were helpful to consumers. The number of responses and relative percentage of the total response by proposed billing guideline is tabulated below.

	Proposed Billing Guideline	Number of people responds as					
		Agree		Disagree	Undecided		
1	Bill Format and Accessibility to Billing Information	66	98.5%	1	1.5%	0	0.0%
2	Bill Organization and Presentation	67	100.0%	0	0.0%	0	0.0%
3	Customer Information	65	97.0%	1	1.5%	1	1.5%
4	Disclosure of Billing Parties	61	91.0%	2	3.0%	4	6.0%
5	Descriptions of Billed Charges	63	94.0%	3	4.5%	1	1.5%
6	Disconnection	63	94.0%	2	3.0%	2	3.0%
7	Disputing Charges	59	88.1%	0	0.0%	8	11.9%
8	Billing Accuracy	66	98.5%	1	1.5%	0	0.0%
9	Billing Timeliness	64	95.5%	2	3.0%	1	1.5%
10	Payment.	66	98.5%	1	1.5%	0	0.0%

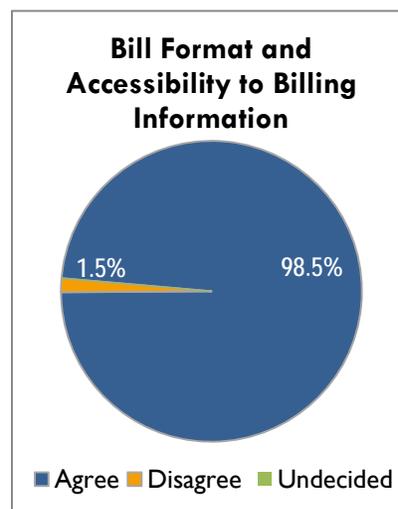
3. Response Summary by Guideline

3.1 Bill Format and Accessibility to Billing Information

Proposed Guideline #1

Service Providers are required to provide billing invoices, free of charge, in a written format agreed by the customer with exceptions for those with special needs. Until further notice and unless specifically agreed in writing by an individual customer, all personal and business customers must be sent a written billing invoice by post. Service Providers are encouraged to improve access to billing information through electronic means such as via stand alone customer kiosks and the Internet. If Service Providers do provide electronic access to billing information, they must ensure that access is quick, simple and easy. For example, customers should be able to independently receive authorization and any needed passwords to access such systems instantly without having to go through a lengthy approval/application process. Customers should also have access to a minimum of 3 months of online billing statements. Service Providers must provide billing formats that are accessible to all of their customers, including those with disabilities, at no additional charge. Due to the substantial number of non-Arabic speakers in Qatar, ictQATAR also requires that bills be bi-lingual in both Arabic and English

Summary of all comments:



Specific comments related to this billing guideline include:

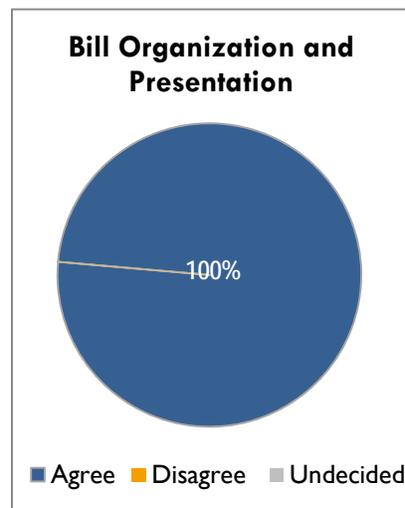
1. Electronic access to billing information should be via secure Internet connections.
2. The language of the bill should be in either Arabic or in English as per customer request.
3. Bills should be sent to email addresses.
4. Service Providers should be required to prepare bills that suit disabled customers, such as bills in larger fonts for weak-sighted people, as well as in Braille-formats for blind customers.

3.2 Bill Organization and Presentation

Proposed Guideline #2:

Telecommunications bills should be clearly organized with billing information presented in a way that it can be easily understood. This information should avoid unnecessary complexity, be straightforward and unambiguous. Where information is grouped by sections and categories, the information presented must be logical and described in such a way so that the customer can readily understand their meaning and context. Most importantly, billing information needs to be specific enough so that customers can accurately assess that the services for which they are billed correspond to those that they have requested. In other words, each amount billed must be clearly related to a particular service or purpose which must be indicated on the bill.

Summary of all comments



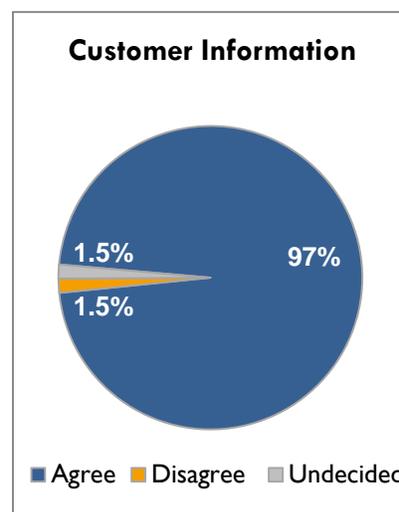
All respondents agreed with the content of this proposal exactly as presented.

3.3 Customer Information

Proposed Guideline: #3:

To ensure that customers are able to easily verify that the bill they have received corresponds to the services they have subscribed to, ictQATAR requires that every bill contain information that clearly identifies the customer. At a minimum, this information should include the name of the customer, the customer number, account number and email or postal address.

Summary of all comments



Specific comments related to this billing guideline include:

1. A major international bank suggested that information about the location of telephone lines like the general area and building/villa number or electricity number need to be included on bills as this information is needed in order to identify the location of lines such as security lines, lanex lines for ATMs etc. for companies that have a large number of lines.
2. An individual proposed that Service Providers should take measures to secure access to on-line billing information so that it can only be accessed by the customer concerned.

3.4 Disclosure of Billing Parties

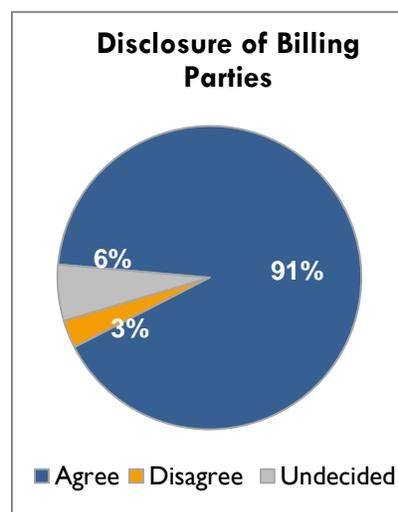
Proposed Guideline #4:

More and more frequently, Service Providers are offering their billing and collection services to individual companies that sell products and services or to companies that bill on behalf of a group of companies. To ensure that customers can clearly identify any products or services billed in this manner, ictQATAR requires that every bill include the name of the billing party associated with each charge. Where the charges for two or more billing parties appear on the same bill, the charges should be listed separately by billing party.

The goal of this requirement is to enhance the ability of customers to review individual charges on their bills and avoid fraud by detecting charges for services for which they have not subscribed.

This requirement does not extend to companies with which a Service Provider has a roaming agreement.

Summary of all comments



Two people (3%) said that they disagreed with this proposal but did not say why. Four (6%) other people indicated that they were undecided about this proposal as they found it difficult to understand.

3.5 Descriptions of Billed Charges

Proposed Guideline #5:

Information regarding charges and their method of calculation must be clearly presented in simple language so that customers can easily assess whether the costs of the requested services conform to their understanding of the price charged. The charges included on a billing invoice should include all charges related to a current billing period to the extent possible. In any case, a Service Provider must not bill for charges for the first time if they are older than 90 days from the date of the charge. ictQATAR requires that all charges appearing on a bill are itemized. All services charged on a per unit (e.g. Msg/MB/Min) basis must include, at a minimum, the:

- name of the service
- date of service
- time of the service
- duration of the service, if applicable
- number called
- charging rate/calculation method
- all related charges
- total charge.

An example is provided below:

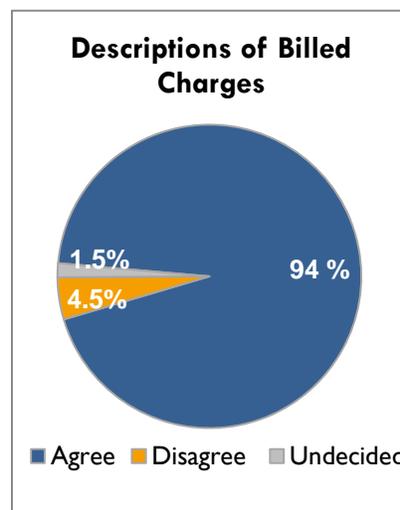
GSM Voice Service: International Call :

Date	Time	Number Called	GSM /Min Charge	IDD*/ Min Charge	Duration	Total Charge
1/9/2008	10:00 AM	+974 4995333	0.35	2.08	5 Min	12.15

*IDD is International Direct Dialing

For customer equipment or other non-call/unit charges, Service Providers must list each item and the amount billed. Service Providers may offer customers an option to opt-out of receiving itemized billing if the customer wants to avoid lengthy billing statements. However, these customers should still receive a billing

Summary of all comments



summary and be able to view their full billing statement on an itemized basis through an electronic means.

Specific comments from respondents include:

1. Billing information should include which country or city the call was placed to.
2. Bills should indicate whether or not bandwidth levels for Mobile Internet and 3G services were met as per the contractual terms and conditions and as published by the Service Provider.
3. In cases where customers are disconnected from a service during a communication or download; the reconnection charges should be free and any download charge should commence from the point of disconnection. In cases where the Service Provider cannot satisfy the latter condition; downloads following an interruption due to the Service Provider network should be free of charge.
4. Customers who subscribed to more than one service with a Service Provider (e.g. Fixed, Mobile and Internet) should be provided with a single bill that details the respective charges. Any promotions, discounts or roaming charges should be clearly indicated on the bill.
5. The method for calculating charges calculation should be included at the end of the bill, or in a separate attachment.

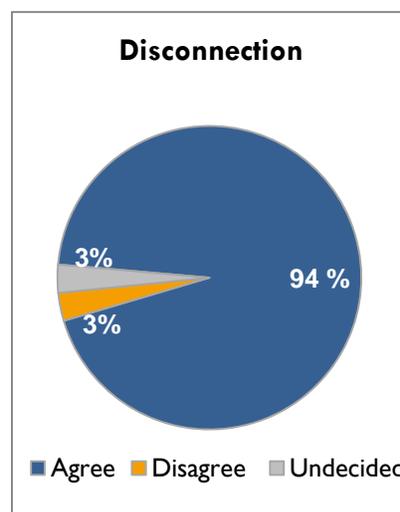
3.6 Disconnection

Proposed Guideline #6:

Service Providers must clearly inform customers when non-payment of a service or group of services will result in full or partial disconnection of a service/s. Before disconnecting a customer for any reason, the Service Provider must first notify the customer in writing of any planned action to disconnect the customer. The written notification may be sent by post, email or SMS for example.

ictQATAR encourages Service Providers to avoid disconnecting customers except for extreme circumstances. The implementation of late fees, outgoing call barring and special payback schemes may be a more effective means for Service Providers to recover any unpaid charges as well as strengthen customer relationships.

Summary of all comments



Specific comments from respondents include:

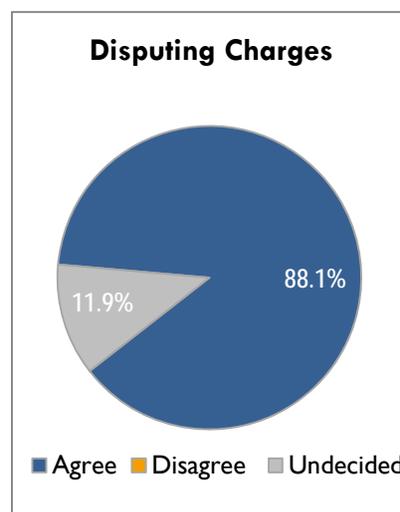
1. Three individuals and one major international bank commented that they were not notified before they were disconnected from telecommunications services in Qatar and believe that it is important for Service Providers to provide notification in writing prior to being disconnected as this will give them an opportunity to rectify any outstanding charges so as not to disrupt services.
2. One respondent indicated that Service Providers should alert customers of their intention to disconnect customers 14 days prior to doing so.
3. Additional billing arrangements are needed for customers who are abroad and want to keep from being disconnected due to exceeding their limit. These arrangements should also make it easier to get reconnected.
4. Any application of late fees should be consistent with Islam.

3.7 Disputing Charges

Proposed Guideline #7:

Service Providers must provide a toll free number/s by which customers may query or file a dispute regarding any charge contained on their bill. The toll free number/s must be prominently displayed on billing invoices so that it is easily noticeable by customers. Service Providers must also provide a means for customers to dispute charges in writing, if they so request, by providing a mailing address or electronic means of communication (email, website, fax etc...). To ensure that customers are not intimidated into paying for charges that they believe are incorrect, Service Providers must clearly indicate that a customer will not be disconnected from a service while the dispute is under review. They must also clearly indicate that a customer is **not** liable to pay the charges that are under dispute while the dispute is still on-going. Customers will be liable to pay for any charges that are rightfully due. Service Providers should endeavor to promptly resolve any billing disputes and do so no later than 30 days from when the dispute was filed. The 30 day dispute resolution period may be extended if both parties, i.e. the customer and the Service Provider, are in agreement.

Summary of all comments



Specific comments from respondents include:

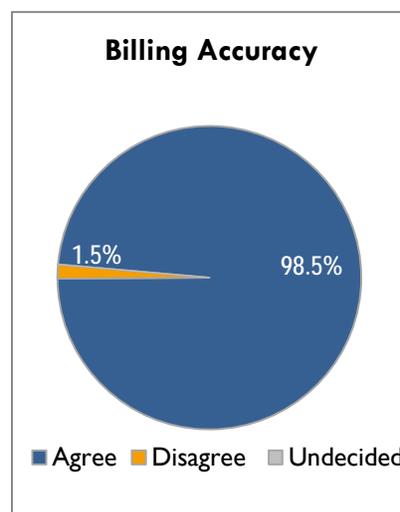
1. One major international bank felt it was extremely important to have a billing contact number for corporate customers where customers can dispute charges over the phone. This bank indicated that this service is currently not available with the Service Provider they are using in Qatar.
2. An individual also expressed strongly that the Service Provider they are using does not offer a contact number for billing disputes which he felt is needed. At the moment, if you dispute a charge you must call the general customer service number and then you are told to file your complaint at the main branch, which is not convenient.

3.8 Billing Accuracy

Proposed Guideline #8:

Service Providers are required to ensure the accuracy and reliability of any billing system used in connection with the provision of telecommunications services to the public. Service Providers must be able to demonstrate the accuracy of their billing in response to customer queries regarding disputed charges. Customers will be entitled to a refund or a credit to their account if this accuracy cannot be demonstrated.

Summary of all comments



Specific comments from respondents include:

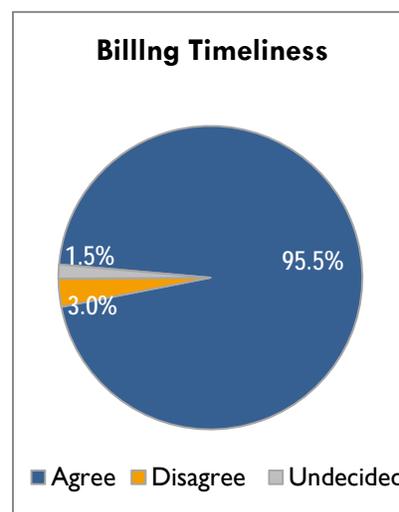
1. Customers should be refunded for disputed charges and poor Quality of Service that cannot be verified through a Service Provider's billing system and records.
2. What is meant by billing accuracy needs to be defined. For example, billing accuracy could include reports that can show the amount of the charge and how it has been assessed, including fractional billing increments, the date and exact time of the phone call, the full personal details of the customer and the exact service type/category etc...

3.9 Billing Timeliness

Proposed Guideline #9:

Service Providers must ensure that customers are provided with a telecommunications bill on a timely basis and no later than 20 days after the closure of a billing period. A billing period is approximately 30 days or one month in duration. SMS alerts or other forms of messaging alerts do not constitute as billing invoices. Service Providers are encouraged to make use of innovations such as electronic access to billing information as a means to ensure timeliness in market where the population is increasingly mobile and where the postal system cannot always be relied upon

Summary of all comments



Specific comments from respondents include:

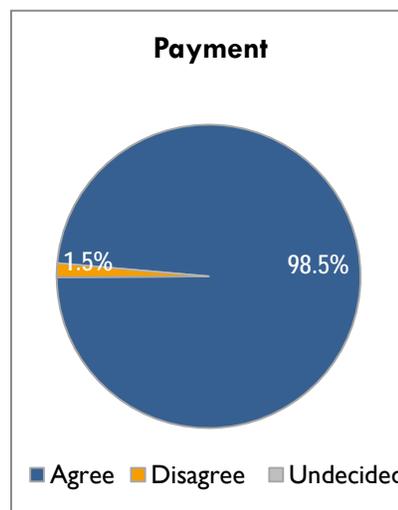
- 1 One individual suggested that it would be reasonable to allow Service Providers to provide bills within 30 days rather than 20 days after the closure of a billing period.

3.10 Payment

Proposed Guideline #10:

Customers must be given a period of no less than 30 days from the date a bill is issued to make payments for any outstanding charges. The issue date of the bill must be clearly indicated on the bill. Service Providers must also inform customers of all payment options - credit card payments over the phone, electronic means, post and/or over the counter (e.g. customer service center) and ensure that the necessary steps have been taken to safeguard the security and accuracy of all payment transactions to the extent possible. All Service Providers should submit proposals to ictQATAR in respect of the provision of direct debit facilities to customers no later than 1 April 2009. For customers who elect to use a direct debit payment scheme, the Service Provider must provide a means (e.g. web, telephone or SMS) for customers to easily cancel any authorizations given for direct debit bill payments if they so choose. Customers must be able to verify that their payments have been received by acknowledgment of payment on their next bill, by calling the Service Provider's customer service number or via other mechanisms chosen by a Service Provider such as on-line enquiry mechanisms, the Internet or interactive voice response services.

Summary of all comments



Specific comments from respondents include:

1. Operators should encourage customers to pay bills quickly, in advance of payment due dates, by giving points and concessions to such customers.
2. The ability to pay online is very important.



**Response to ictQATAR's proposed
"Telecommunications Billing Guidelines"**

September 25, 2008

Qatar Telecommunications (Qtel), Q.S.C.

Executive Summary

Qtel reviewed with interest ictQATAR's recent consultation on billing practices. Generally, Qtel does not see the need for ictQATAR regulation of service provider billing. Qtel believes that the coming competition will offer adequate incentives to make sure its billing practices meets the needs of customers. Also, ictQATAR should observe the Telecommunications Law and issue a Consumer Protection Policy before issuing any specific regulation.

If ictQATAR decides to proceed with these regulations, Qtel suggests that any regulation is limited to consumer services only. We offer the following comments on ictQATAR's specific proposals:

1. **Bill Format and Accessibility to Billing Information:** The proposal to require service providers to provide itemized invoices to all customers by post should be modified not to include pre-paid services and to allow the customer to select electronic delivery of invoices.
2. **Bill Organization and Presentation:** Qtel requests ictQATAR to clarify this proposal.
3. **Customer Information:** Qtel has no problem with this proposal.
4. **Disclosure of Billing Parties:** Qtel has no problem with this proposal.
5. **Description of Billed Charges:** Qtel suggests that the proposed 90 day limit on billed charges is a general requirement only, with exceptions allowed in unusual circumstances. Qtel also supports a more flexible approach for billing for usage based services.
6. **Disconnection:** Qtel's current policies are in line with the proposed requirement, but Qtel requires limits on publication of its policies to inhibit fraud and abuse.
7. **Disputing Charges:** Qtel supports a longer time-frame for resolving outstanding disputes.
8. **Billing Accuracy:** Qtel believes it is unreasonable to require it to bear the burden of demonstrating the accuracy of its billing system in response to customer queries.
9. **Billing Timeliness:** Qtel has no problem with this proposal.
10. **Payment:** Qtel requires further information regarding ictQATAR's proposed requirement to submit a proposal to ictQATAR regarding direct debit facilities. Qtel also would have difficulty complying some of the proposals regarding direct debit practices.

Introduction

This submission is in response to ictQATAR's recently issued consultation document entitled, "ictQATAR Proposal for Telecommunications Billing Guidelines: Protecting Consumers from Unfair Billing Practices". Qtel takes very seriously the need to ensure its customers are treated fairly. Indeed, customer satisfaction is Qtel's most important priority at the current time as it prepares to face competition from a new entrant in the coming months.

With some important exceptions discussed in detail below, Qtel's current billing practices are consistent with the guidelines proposed in the consultation document. Qtel, however would urge ictQATAR to reconsider introducing billing regulations at the current time. For the reasons set out in greater detail below, Qtel believes that a set of billing guidelines are unnecessary at the current time.

General Comments

Qtel believes that billing regulations are unnecessary. It is clear to Qtel management and staff that customer satisfaction is critical to the continued success of the business. Qtel expects to face a serious challenge from its competitor in the coming months, and keeping customers satisfied will be critically important to its continued success. Indeed, significant efforts are underway to enhance Qtel customer satisfaction and to improve customer communication, including billing. Qtel will soon have more than enough incentive to ensure that its billing practices meet or exceed customer expectations. It is an accepted tenet of international best practice that where market incentives are sufficient to achieve a goal, that regulatory intervention is unnecessary. Indeed, all regulation imposes costs that are ultimately borne by consumers. Qtel believes consumers would be better served at this time by regulatory forbearance.

We are also somewhat concerned by the title of the consultation document and its reference to "unfair billing practices". Qtel is troubled by the inference that this consultation is necessary to address a set of practices that ictQATAR considers "unfair". The consultation document, however, does not cite any current industry practices it finds to be "unfair" or provide any specific information at all about the need to adopt this set of regulations at the current time.

Further, Qtel believes that the industry would be well served if ictQATAR were to provide it with a clear view as to its priorities and regulatory plans with respect to protecting consumers. Indeed, an open and transparent discussion of its intended consumer protection program and priorities in this respect would be of great benefit to the sector. It would enable Qtel, its competitor and other stakeholders to be able to better plan regulatory programs and provide more meaningful and constructive input to ictQATAR. Moreover, it is clear that Articles 48-50 of the Telecommunications Law envision the development of a Consumer Protection Policy in advance of developing any specific implementing regulation. Qtel would urge ictQATAR to observe these provisions of the Telecommunications Law in the interests of all stakeholders.

If in spite of the above comments, ictQATAR decides to nonetheless go ahead with the proposed regulation, Qtel has a number of general concerns regarding ictQATAR's approach. First, the consultation document states that ictQATAR has taken care not to propose overly descriptive guidelines "so as to allow service providers flexibility in meeting the requirements" While Qtel would applaud such an approach, the proposed "guidelines" include a mix of highly prescriptive requirements that appear to offer little flexibility and ambiguous encouragements that appear non-binding but would leave service providers with a high degree of uncertainty. Qtel would encourage ictQATAR to either state specifically how much flexibility service providers would be afforded with respect to specific proposed measures or to rework some of the more restrictive language contained in the proposal so that compliance with such provisions can be objectively determined.

Second, Qtel suggests that the type of billing guidelines proposed are more appropriately limited to services aimed at consumers and that the proposed guidelines should not be applied to services provided to Qtel's corporate customers. While customer satisfaction for corporate customers is a major priority for Qtel and is at least as important as consumer services, the services and billing practices for corporate services are far more complex and varied. Services for corporate customers are often highly tailored and complex, making application of generalized billing guidelines more challenging. Moreover, corporate customers are far more sophisticated and accounts are closely managed, removing the need for detailed regulations to protect their interests. For these reasons, Qtel urges ictQATAR to limit the application of any billing regulations to consumer services only.

Comments on Specific Proposals

1. Bill Format and Accessibility to Billing Information

The consultation document proposes to impose several broad requirements regarding bill format and information on all service providers. While the intention of the proposals is clearly to benefit consumers, there are a number of practical issues that would make compliance with these requirements difficult, and as a result they may not serve the needs of Qtel's customers.

First, the consultation document proposes to require service providers to provide all personal and business customers itemized invoices and that such invoices be sent to all customers by post unless they agree otherwise. In our view, the requirement of an itemized invoice for all services should be modified to only apply to postpaid services. Imposing a broader requirement would be highly disruptive and have little apparent benefit. To require bills to be sent to subscribers of Qtel's prepaid mobile, international calling card and internet subscribers (not to mention pay-telephone users) would fundamentally alter the economics of those services and require substantial changes to Qtel's current pricing models. Qtel believes that such action would be of little benefit to its customers. With respect to the requirement that all invoices be sent by post unless otherwise agreed, Qtel currently offers subscribers a choice of receiving bills electronically or by post. Qtel customers are pleased with this arrangement, and we would urge ictQATAR not to upset this practice.

Second, the consultation document proposes to require “billing formats that are accessible to all their customers, including those with disabilities.” Qtel currently undertakes a variety of measures to serve its customers with disabilities, including specialized customer service and a variety of discounted offerings. If ictQATAR intends to impose further requirements on Qtel as a result of this measure, it would be helpful to provide greater specificity and detail as to what requirements are intended.

2. Bill Organization and Presentation

ictQATAR has proposed to include a general set of statements regarding billing information. Qtel is of the view that generality and ambiguity of this proposed guideline makes it difficult to determine what exactly it would require. To a large extent, this provision would appear to overlap with proposed guideline no. 5. Qtel would suggest that this section be clarified or else combined with proposed guideline no. 5.

3. Customer Information

The Consultation proposes to require that “every bill contain information that clearly identifies the subscriber,” and that it should include an account number and email or postal address. Qtel has no problem with this requirement, as it is consistent with its current practice, but nonetheless questions the need for such a requirement, as it would be difficult or impossible to collect a bill without such information.

4. Disclosure of Billing Parties

The consultation document proposes to require that all bills include the “name of the billing party.” It was difficult for Qtel to understand the exact intention of this requirement, but it appears to be aimed at the practice of billing on behalf of third parties. At the current time, ictQATAR is the only third party with whom Qtel has any third-party billing relationship (for trading and for frequency licenses on behalf of ictQATAR), and Qtel has no plans to expand this practice. Qtel has no problem in ensuring adequate disclosure of ictQATAR as the responsible billing party in such cases.

5. Descriptions of Billed Charges

The consultation document proposes a number of specific measures with respect to charges and their method of calculation. First, it proposes to require that charges be “clearly presented in simple language . . .” Qtel has no problem with such a requirement and believes it would be in full compliance were one imposed.

Second, the document proposes that service providers be prohibited from charging for services that are older than 90 days from the date of the charge. In general, with respect to consumer services, there should be no problem complying with this requirement. In exceptional cases because of delays in receiving data from international roaming partners, compliance with the proposed standard may be difficult. Qtel believes that it should be justified in exceptional cases to bill for charges that are older than 90 days. Moreover, with respect to corporate services, it may be necessary to bill for services up to 180 days after they are incurred. This is particularly the case with respect to complex installations of PABX equipment and other services where there may be operational delays due to construction and other factors.

Third, the consultation proposes to require a minimum set of requirements for services charged on a usage basis. This requirement is problematic for Qtel in two respects. First, Qtel does not include itemized details of SMS messages due to the high volume of such messages sent by many subscribers. Prior experience with such itemization indicates that some customers bills can run to over 50 pages. This practice was modified due to the postal expense and environmental sensibilities. The current practice is to indicate the number of messages sent per day. Customers are able to request an itemized detail from customer service. Second, Qtel does not currently include the applicable rate for usage-based services, because this rate is easily deduced by dividing the total charge by the number of minutes or messages, and the rate itself is routinely published. Qtel views it as unnecessary to clutter the bill with such information. Qtel would urge ictQATAR to adopt a more flexible approach with respect to the proposed standard for usage based services.

6. Disconnection

The consultation document proposes several requirements with respect to disconnection of service. First, it proposes to require Qtel to “clearly inform customers when non-payment of a service or group of services will result in full or partial disconnection of a service.” Qtel does clearly inform customers regarding its policies in this respect, but does not publish them. Qtel would urge caution on this proposal and submits that publication of too much information in this respect can lead to abuse. This danger will be particularly acute when consumers are able to switch to an alternative operator to escape accumulated charges. While Qtel policies and processes on this matter are clear and consistent, we would urge ictQATAR to take a flexible approach to this issue.

Second, the consultation document proposes to require service providers to notify a customer in writing before disconnecting the service. This requirement would be consistent with Qtel’s current practices.

7. Disputing Charges

The consultation document proposes a requirement that service providers provide a “toll free number” for customer inquiries and that such numbers be prominently displayed on invoices. Qtel would have no problem complying with such a requirement. Qtel currently publishes its customer service numbers on all mobile and fixed invoices, those numbers are provided locally free of charge.

The consultation document also proposes to require service providers to “clearly indicate that a customer is not liable to pay charges that are under dispute” Such a requirement would not be inconsistent with Qtel practices, as Qtel does clearly communicate its policies to its customers in response to inquiry. Qtel would urge ictQATAR to allow service providers flexibility in implementing such a requirement, however, especially in light of the potential for fraud and abuse as discussed in the previous paragraph.

Finally, the consultation proposes that service providers be required to resolve outstanding disputes within 30 days of initial filing. While Qtel endeavours to resolve all

disputes promptly and indeed does resolve the vast majority of disputes in a number of days, we submit that 45 days is a more reasonable timeframe for resolving such disputes.

8. *Billing Accuracy*

The consultation document proposes to require service providers to “demonstrate the accuracy of their billing in response to customer queries” Qtel’s billing system is a high quality system developed in accordance with the highest international standards and is subject to periodic external audit by the State Audit Bureau, internal Qtel audit and external auditors such as KPMG, Price-Waterhouse and Earnest & Young. While Qtel does work closely with customers to resolve any outstanding disputes regarding billed amounts, there is no way for Qtel to “demonstrate” in a particular instance that there are no problems with its billing system. Such a requirement would in effect require Qtel to prove a negative condition or bear the risk of forfeiting billed amounts. Qtel believes that such a requirement would be unprecedented in international practice and grossly unfair.

9. *Billing Timeliness*

The consultation document proposes to require that customers are provided with a bill no later than 20 days after the closure of a billing period. Qtel currently does provide bills to customers within such a time frame and would not have a problem complying with such a requirement.

10. *Payment*

The consultation includes several proposals with respect to payment matters. First, it proposes that customers should be given a period of not less than 30 days from the date a bill is issued to settle outstanding balances. This proposal is in line with Qtel’s current practice.

Second, the consultation document proposes to require service providers to inform customers of all available payment options and take appropriate security measures. Qtel currently does provide such information to customers and undertake such security measures.

Third, the document proposes to require service providers to “submit proposals to ictQATAR in respect of the provision of direct debit facilities to customers” Qtel would require more information in order to adequately respond to such a requirement. Qtel does currently offer customers the option of direct debit via certain banks in Qatar. Qtel suggests that a more specific statement of requirements would allow it to submit a “proposal” in this respect that may be more useful to ictQATAR.

Fourth, the consultation proposes that service providers should provide customers a means to “easily cancel any authorizations given for direct debit payments if they so chose.” Qtel would not have the ability to comply with such a requirement, as its direct debit arrangements are controlled exclusively by its customer’s bank. Initiation and cancelation of direct debit payments must be undertaken through the customer’s bank.

Finally, the consultation proposes to require that customers be able to verify that payments have been received via acknowledgement on subsequent bills, customer service

agents or via its website. Qtel does currently offer this capability and would have no problem complying with such a requirement.