

Umniah Mobile Company (Umniah) welcomes the opportunity to participate in responding to the TRC's Public consultation for the draft regulatory decision for establishing an Internet Exchange Point (IXP) issued by the TRC on 4 November 2019. Umniah believes that the primary role of establishing an IXP in Jordan is to keep the local traffic local and save international bandwidth which will reduce the cost to exchange traffic between operators and ensure in-border operation continuity in case of international connectivity failure.

Umniah has made the following comments:

- Cost of domestic interconnection bandwidth to the IXP is less than the cost of same bandwidth to international provider.
- Accessibility to the IXP is a very important Cost factor (CAPEX) that should be taken into consideration while planning g for IXP ,so the location of IXP should "Neutral" and near to potential network operator.
- Who will own the IXP? as a commercial for-profit entity we need to have a clear visibility on the ownership structure especially that this entity is not really required to make any investments since the participants will divide the CAPEX and OPEX costs of the IXP (point 4.1.6)
- We need to know the requirements of the Neutral location since all the Data Centers in Jordan are owned by Telecom operators, which will make them unnatural.
- Regarding article (4.1.8) enter or withdraw from the IXP: This article is not clear, as it is the ISP right to withdraw from the IXP without a decision to be required from TRC.

- c Regarding article (8) fees and Tariffs, the cost and fees must be regulated and known in addition to the total cost and the fees and the total cost to connect to the IXP.
- c The prices should guarantee a zero to no profit for the next X number of years, otherwise a single entity will benefit from what otherwise should be a shared cost/service by all ISPs.
- c Umniah believes that the draft decision is not clear and raise the following concerns:
 1. How many local network operators, the cost of connection to IXP, amount of local traffic?
 2. What will be the operational (organizational) model of the IXP?
 3. Where will be the IXP(Location)?
 4. Who will operate the IXP?
 5. Which technical model will deploy?
 6. What will be the policies/regulations for Membership?
 7. What are the required Licenses or permissions?
 8. What is the approx. budget to build the IXP?