

ANNEX (2)

Umniah's Comments on the Draft Instructions for Key Performance Indicators (KPIs) for Wholesale Services

No.	Indicator	Definition	Methodology	Target value	Comments
A1	Percentage of Orders Rejected	Percentage of orders submitted that are rejected by the Designated Licensee in the measurement period	(Number of orders rejected) / (Total number of orders received)	< 5%	<p>TRC should clearly define the specific circumstances under which orders are rejected and should be excluded from the KPI calculation. Examples of exclusions are included:</p> <ul style="list-style-type: none"> ○ Orders rejected due to inaccurate information or documentation provided by the requesting Licensees (e.g., incorrect address, failure to meet technical prerequisites). ○ Rejections resulting from third-party issues, such as delayed approvals from landlords or municipalities that prevent service installation. ○ Cases where the network cannot accommodate the requested service (e.g., lack of infrastructure in specific areas). <p>Not including these rejections in the KPI calculation will lead to misleading performance assessments of the Designated Licensees, where the overall rejection</p>

					<p>percentage may not accurately reflect the efficiency or service quality of the Designated Licensees if factors outside their control are included.</p> <p>We suggest a modified KPI calculation method that reflects a fair assessment of performance.</p> <p>We believe that TRC should establish criteria for which rejection types qualify for exclusion (e.g., documented customer errors, technical limitations, etc.).</p>
A2	Service Provision	Percentage of orders delivered within the SLA time or in agreed time set for service type in the measurement period	(Number of orders completed within the SLA or in agreed time) / (Total number of orders accepted)	> 95%	<p>The designated licensee should not be held responsible for delays arising from factors beyond their influence. Consequently, certain circumstances affecting the timely delivery of services may be outside the Designated Licensee's control. The following examples can be highlighted:</p> <ul style="list-style-type: none"> • Situations where external entities, such as municipalities, landlords, or utility companies, delay necessary permissions or access for service installation. • Cases where the other licensee is not ready for installation or delays the process by failing to provide access or necessary information. • Force Majeure or Exceptional Events including infrastructure disruptions that make it Impossible to meet the agreed timelines.

					We suggest to adjust the calculation by excluding orders that are delayed due to the identified uncontrollable factors.
A3	Number of Orders Held over 10 Days (Waiting Orders)	Number of orders not completed within the SLA or the agreed time that have exceeded a delay of 10 Days (i.e. SLA target delivery date PLUS 10 days) in the measurement period.	(Number of orders completed more than 10 days later than SLA) / (Total number of orders exceeding SLA)	< 1%	<p>A delays may arise from factors outside the Designated Licensee's control, such as:</p> <ul style="list-style-type: none"> • Delays in receiving necessary equipment or services from third-party vendors can significantly impact the order completion timeline. • If the other licensee fails to provide required documentation or access to their premises, this should not be counted against the licensee. <p>we propose a revised calculation that accounts for these uncontrollable factors.</p> <p>By excluding these uncontrollable factors, the KPI will more accurately reflect the performance and efficiency of the Designated Licensee.</p>
A4	Age of Oldest Order	Age of oldest order	Number of days since order submitted for oldest order		<ul style="list-style-type: none"> • TRC should establish criteria for excluding delays caused by factors beyond the Designated licensee's control, such as third-party delays, regulatory issues, or requesting Licensee actions that impede order fulfillment.
A5	Total Average Service Provision time	Average time to provide Service in the measurement period.	(Total time to delivery all orders in the measurement period) / (Number of Service orders delivered in the measurement period)	N/A	<ul style="list-style-type: none"> • TRC should establish criteria for excluding delays caused by factors beyond the Designated licensee's control, such as third-party delays, regulatory issues, or requesting Licensee actions that impede order fulfillment.

A6	Percentage of Order Service Availability (If an ordering portal / gateway is provided by the Designated Licensee)	Percentage of actual availability of a service ordering portal/gateway versus total committed availability of the ordering portal / gateway for service provision or service assurance, during the period in the measurement period.	(Actual availability time) / (Total committed availability)	> 99%	There may be external factors impacting availability, such as third-party service disruptions or unavoidable outages, which should be considered under Exclusions for Uncontrollable Factors.
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A.II Service Assurance

1. The measurement of service assurance starts either at the time that the fault is reported by a Licensee taking a Service from the Designated Licensee. The measurement stops at the time and date that the Service is restored to the Licensee, as defined in the SLAs in the RIO.		
2. The reporting against each of the KPIs is to be further broken down by a) specific Service type and b) by Licensee to which the Service is provided including the Designated Licensee's own affiliate business.		
3. For each KPI identified below the Designated Licensee, in addition to the providing the performance against the KPI, should provide the inputs of the measurement formula (numerator and denominator) used in the calculation of each KPI.		

No.	Indicator	Definition	Methodology	Target value	Comments
B1	Average Time to resolve a fault	Average time to a resolve a fault in hours and minutes in the measurement period.	(Total time to resolve all faults) / (Number of faults accepted)	N/A	<ul style="list-style-type: none"> - A reasonable target value should be set to ensure accountability and motivate ongoing improvements in service reliability. - The target should be tiered based on fault severity (e.g., critical vs. minor faults) to reflect different response expectations. - We propose fault resolution time for a specific type of fault is 4 hours for

					<p>critical faults and 24 hours for non-critical faults</p> <ul style="list-style-type: none"> - Certain uncontrollable factors (such as third-party dependencies, Designated Licensee's site access delays, or force majeure) should be excluded from the calculation to ensure the KPI accurately reflects the fault resolution process managed by the Designated Licensee. - Clear definition of "faults accepted" should be included to avoid ambiguities in what counts toward the KPI calculation. We propose the definition of "faults accepted" that are validated as genuine faults requiring action from the Designated Licensee (e.g., service outages, performance degradation).
B2	Percentage of New Service provision faults	Percentage of Service orders provided where a fault is reported within twenty-eight (28) calendar days of the Service being delivered, in the measurement period.	$(\text{Number of Service orders where a fault is reported within twenty-eight (28) calendar days of the Service being delivered}) / (\text{Total number of Service orders completed})$	< 5%	<ul style="list-style-type: none"> • Some faults within the first 28 days may not be the result of the Designated licensee's actions or issues, and these should be excluded from the KPI calculation.
B3	Fault Rate	Percentage of installed Service based reporting a fault in the measurement period.	$(\text{Number of faults reported per Service}) / (\text{Total installed Service base})$	<10%	<ul style="list-style-type: none"> • Clear definition of what constitutes a "fault" is essential to ensure that the KPI is fair and accurately reflects performance (Service outages or degradation should be classified as faults).
B4	Percentage of Repeat faults	Percentage of faults reported where further faults are reported within twenty-eight (28) calendar days in the measurement period.	$(\text{Number of repeat faults per Service}) / (\text{Total number of faults per Service})$	< 5%	<ul style="list-style-type: none"> • Clear definition of what constitutes a "repeat fault." to ensure consistency in

					<p>measurement and reporting, proposed definition related to repeated faults as the only issues caused by incomplete or inadequate resolution of the original fault.</p> <ul style="list-style-type: none"> Exclusions should be included for repeated faults that caused by external factors (e.g., power outages, third party), faults unrelated to the original issue (e.g., a new fault on a different part of the network).
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A.III Service Administration	
4. The reporting against each of these KPIs is to be further broken down by Licensee to which the Service is provided including the Designated Licensee's own affiliate business.	
5. For each KPI identified below the Designated Licensee, in addition to the providing the performance against the KPI, should provide the inputs of the measurement formula (numerator and denominator) used in the calculation of each KPI.	

No.	Indicator	Definition	Methodology	Target value	Comments
C1	Percentage of Billing Complaints	Percentage of the number of billing complaints/concerns raised (by licensee) against the total number of invoices in the measurement period.	$\frac{\text{(Number of billing complaints/concerns raised)}}{\text{(Total number of invoices)}}$	< 5%	<ul style="list-style-type: none"> "billing complaint/concerns" should be clearly defined to ensure that only legitimate billing errors are considered in

					<p>the KPI. For example, billing complaints could be defined as:</p> <ul style="list-style-type: none"> - Discrepancies in the billed amount versus agreed-upon tariffs. - Incorrect charges (e.g., overcharges, duplicate charges).
C2	Number of Service Credits Issued	Number of service credits issued owing to incorrect billing claims per billing period in the measurement period.	Number of service credits issued in billing period	N/A	
C3	Billing Accuracy (Percentage of Bill Discrepancy)	Percentage of discrepancy between the "correct" billing amount and the amount originally invoiced in the measurement period.	(Total value of billing error) / (Total amount billed in the disputed invoice)	< 1%	<ul style="list-style-type: none"> - "Billing error" should be defined to ensure common consistently of applying this KPI. - The methodology should specify whether it includes only disputes resolved or all disputes raised, as this could significantly impact the calculated percentage. Including all disputes could provide a more comprehensive view of billing accuracy. - We propose the target Value: 2% to 5%; this range allows for flexibility based on the complexity of billing systems, the nature of the services provided, and the operational capabilities of the licensee.
C4	Average Time to Resolve Billing Issue	Average time to resolve a billing issue in the measurement period.	Total time (in days) for the Designated Licensee to resolve billing issues/Total number of resolved billing issues	N/A	
C5	Number of Service Complaint	Service complaints (other than billing) received in the measurement period.	Total number of Service complaints received	N/A	
C6	Percentage of Complaints Resolved in 14 days	Percentage of complaints (other than billing complaints) successfully resolved within fourteen (14) days of the complaint being received in the measurement period.	(Number of complaints successfully resolved within 14 days) / (Total number of complaints received)	>80%	

C7	Average Time to Resolve Complaint	Average time to resolve a complaint (other than a billing complaint) in the measurement period.	(Total time to resolve all complaints successfully) / (Total number of complaints)	N/A	<ul style="list-style-type: none"> • Absence of a target value limits the effectiveness of this KPI. • We propose to set target value based on industry benchmarks of 5 to 7 days.
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