

Fibertech's Response to Zain Comments on the draft Implementation of a Margin Squeeze Test

Document Name	Zain Comment	Fibertech Reply
<p>Response to TRC Public Consultation Document</p> <p>“Implementation of a Margin Squeeze Test for local access and broadband access”</p> <p>Page:26 (Last Page of Document)</p>	<p align="center">Umniah and Fibertech Shared Ownership</p> <p>106. We understand that Fibertech is becoming an increasingly powerful company in the fibre broadband access market. This company was not operational at the time of the last market review in 2020 and so is not subject to any regulation. Given the relationship between Fibertech and Umniah, it may be appropriate for the TRC to consider whether Umniah and Fibertech enjoy a position of dominance in the next market review. If it is found to do so then an MSQT should be considered between the wholesale offers provided by Fibertech and the retail offers of Umniah.</p>	<p>Fibertech is a non-dominant player with a limited geographical footprint, competing against multiple operators with diverse broadband technologies and alternative infrastructure and networks. Our wholesale prices are transparent, standardized, and available to all market players without discrimination.</p> <p>We also operate as an independent company with its own legal registration, board of directors, and financial statements. Noting that no telecom operator or ISP holds a majority stake in Fibertech.</p>