

SECRETARÍA DE ESTADO PARA EL AVANCE DIGITAL

DIRECCIÓN GENERAL DE TELECOMUNICACIONES Y TECNOLOGÍAS DE LA INFORMACIÓN

SUBDIRECCIÓN GENERAL DE INSPECCIÓN DE LAS TELECOMUNICACIONES

SPANISH ANSWERS TO THE BEREC GUIDELINES DETAILING QUALITY OF SERVICE PARAMETERS CONSULTATION QUESTIONS

INTRODUCTION

Spanish telecommunication operators must measure and publish in their web page certain QoS parameters (https://www.boe.es/buscar/doc.php?id=BOE-A-2014-6729) once every three months. These parameters are measured according to the ETSI EG 202 057. Spanish ANR publishes a summary of the measures taken by these telecommunication operators enabling easy comparison between these results (https://avancedigital.gob.es/es-es/Servicios/CalidadServicio/informes/Paginas/Informes09.aspx).

The detail of the measurement procedures are agreed in working groups and must be approved by the Spanish QoS Commission. These agreements are set out in several guides (https://avancedigital.gob.es/es-

es/Servicios/CalidadServicio/DocRef/Paginas/Documentaciondereferencia.aspx). An annual audit assures that telecommunication operators are measuring according to the guides as well as comparable results.

CONSULTATION QUESTION 1

Spanish telecommunication operators were obliged to measure and publish: Call Set up time, dropped call ratio and unsuccessful call ratio. Since 2014 these parameters are no longer measured nor published anymore. The main reason is that the results given by the different telecommunication operators were very similar and stable in time, and therefore, did not provide valuable information.

Successful SMS Ratio and SMS delivery time QoS Parameters proposed would be in Spain obsolete, as SMS service is hardly used at all by residential customers.

Although ETSI guides define QoS parameters at a high level, in some cases it is difficult to measure according to the definition of these parameters. For example, frequency of customer complaints is defined as the number of complaints divided by the number of customers. Nowadays, not all telecommunication operators offer the same number of services per customer. In order to make this QoS measure comparable the parameter has to be measured making a distinction between fixed and mobile services. Telecommunication operators cannot always make this distinction (fixed service complaint or mobile service complaint). Dividing by lines instead of customers would turn the parameter easier to measure. Therefore it would be useful if every country could make small adaptations of the ETSI guides to its specific needs.

QoS information published real use is made by the telecommunication operators, as they use this information to compare themselves with their competitors. The number of customers that access the QoS information published is very low.

CONSULTATION QUESTION 2

Spain does not have previous experience in measuring these parameters. It would be precise to make a deep study in order to determine the feasibility of these QoS parameters measurement. They seem quite



difficult to measure as UE are also involved, and they not only depend on telecommunication operators services.

CONSULTATION QUESTION 3

In general, Spain agrees with the Guidelines covering Publication of Information. Just need to point out that the measurement of QoE parameters would be very difficult, if not impossible.

Spain publishes QoS information considering residential customers and at a national level. It would be difficult to publish this information at a regional level.

CONSULTATION QUESTION 4

The Spanish quality certification mechanism is an annual audit. There isn't a specific audit method for these types of audits, and there are very few auditors that work them.

Most of the proposed QoS parameters (i.e, frequency of customer complaints) cannot be translated to contractual guarantees. Spanish telecommunication operators only include in their contracts individual levels of compromise for the following parameters: supply time for initial connection and fault repair time. Therefore, it is not possible that users compare their contracts with all QoS published parameters.