

# Communication NewsFlash

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## Telecommunications

# *New guidance on the recognition of revenue - a big issue for the telecommunications industry*

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### **What is the issue?**

The International Accounting Standards Board (IASB) and US Financial Accounting Standards Board (FASB) have released an exposure draft in June 2010 on accounting for revenue recognition in contracts with customers. A standard is expected to be finalized in 2011 with anticipated effective date no earlier than 2014 and retrospective application required.

The proposals aim to make entities recognise revenue from customers more consistently regardless of the industry they operate in. As a result, the proposals could significantly affect current revenue recognition policies for all entities.

Indonesian Accounting Standards move towards IFRS, this write up is to anticipate changes and challenges for the Telecommunication company who applies IFRS issued by IASB; and Telecommunication company who applies Indonesian GAAP, in their reconciliation to US GAAP.



## Why is this issue significant for the telecommunications industry?

Telecommunications entities will be significantly impacted by the proposals for a number of reasons, some of which are listed below.

- Many entities enter into arrangements with customers to sell packages of goods and services or a package of services.
  - For example: a mobile phone that is sold together with ongoing call services; a contract sold with an upfront connection fee and a fee for ongoing call services; a contract providing "free" gifts or rewards to customers along with the provision of telecom services; and a contract that provides different services over different non-cancellable periods such as mobile phone services and broadband connection over different periods.

Under the proposals the accounting for these multiple-element arrangements will be significantly different with revenue from each component of the sale accounted for separately (based on relative fair value).

- Telecommunications entities commonly incur costs associated with securing a customer contract, such as an upfront dealer commission. Under the proposals, such contract acquisition costs need to be expensed.
- Entities commonly enter into agreements to sell optic fibre or its capacity (commonly referred to as IRUs) to other telecom operators, which often constitutes a significant revenue portion of major telecommunications operators. Sale of dark fibre is currently recognised as an upfront sale under the current guidance in IAS 18 *Revenue*. Sale of lit fibre that is not considered a lease arrangement is recognised on a straight line basis over the agreement period,
- The proposals may affect entities' current revenue recognition policies for such transactions if there are additional performance obligations identified in the agreements, such as warranties or right of returns.
- Aside from the proposals' impact on the amount of revenue, gross profit and net profit recognised in a period, some entities will also need to change or modify existing internal controls, accounting and information systems. Recording, processing and generating newly required information under the proposals at the time of sale and until all the performance obligations in a contract have been settled is likely to be a time-consuming exercise.

## Are most telecommunications entities impacted?

Almost all entities in the telecommunications industry will be impacted by the proposals.

The degree of the impact will depend upon the extent to which the entity enters into the arrangements discussed above and the manner or form of performance obligations agreed with the customer at the point of sale.

## What are the overarching proposals?

- **Entities recognize revenue upon the satisfaction of performance obligations stated within contracts. This occurs when control of an asset (a good or service) transfers to the customer.**

Entities will need to identify all performance obligations; these may include not only those obligations that are explicit and embodied in the terms and conditions of the arrangement but also constructive and statutory obligations. For example, the sales offering of telecommunications entities are generally subject to approval of certain regulatory authorities, which may require the entity to provide additional services or benefits to customers that are not explicitly stated in the customer contract.

**Insight:** Many telecommunications entities are concerned about the proposed requirement to separately recognize the assets/liabilities within their contracts. Telecommunications entities have complex product portfolios and typically manage millions of customer contracts. Calculating an asset and a liability on a gross basis for each of those contracts would require significant effort - many would need to consider the capability of existing IT systems to capture relevant information.

- **Entities that enter into contracts with multiple elements or deliverables, such as goods and services which are sold together but delivered at different times, may need to ascribe revenue to each element and recognise that revenue when the performance obligation is satisfied.**

This is a key issue for telecommunications entities where it is common to sell customers "package" deals (such as the sale of a handset with ongoing telecom services).

**Insight:** Telecommunications entities' current revenue systems are based on billing events for services rendered to customers (at prices that are linked

to the contract). These events are not necessarily aligned to the obligations in the contract. Therefore, the proposals would require financial processes that identify the different performance obligations in each contract and pinpoint when and how those obligations are fulfilled. This may require telecommunications entities to account for revenue based on changes in the position of contractual obligations they have with their customers.

- **The transaction price in a contract reflects the variable consideration (to the extent that it is reasonably estimable) the customer promises to pay in exchange for the goods and/or services.**

The transaction price is allocated at the inception of the contract based on the stand-alone selling price of the associated goods and/or services.

**Insight:** Management may need to estimate the value of performance obligations that are not usually sold separately; this may increase volatility within the financial statements.

## What issues in practice might arise when applying the proposals?

The key issue in practice will most likely arise around the timing of revenue recognition.

- **Revenue will be recognised as each performance obligation is completed and control is transferred to the customer.** For example, the amount of revenue attributable to the mobile phone handset may be recognised upfront upon the delivery of the handset, whereas the revenue for the ongoing telecommunications services may be recognised over the contract period. The proposals align the accounting with the performance obligations under the contract rather than the estimation of revenue based on the costs incurred. This will typically result in more deferral of revenue where further performance obligations exist after the initial sale.
- **Changes to systems may be required to reflect the contractual and other obligations arising from the contracts.** Entities should consider whether they need to modify existing systems, or develop new systems, in order to gather reliable information on all customer contracts and understand the impact on the timing of revenue recognition. The proposals may also require consideration of the changes in the form of packages offered to customers in order to achieve a desired accounting result.

- **More disaggregation of contracts and increased use of estimates may be required to allocate the transaction price to separate elements in an arrangement.** For example, an entity that charges a separate upfront connection fee (a distinct performance obligation) aside from the normal periodic fee may need to ascribe a portion of the transaction price to the service regardless of the fact that the upfront connection service is not provided independently.
- **More volatility in the income statement.** Management should assess any contingent or variable consideration to be included in the total transaction price upfront, which could increase volatility in the income statement as estimates change in subsequent periods.

## How the business community responded to the initial proposals (issued via a discussion paper)

### Common themes from the comment letters submitted to the IASB and FASB

- Broad support for the Boards' objectives to develop a single, converged revenue recognition standard.
- Concern that developing one model for all contracts in all industries may not be possible.
- General support for the principles suggested, but many believe:
  - A significant amount of clarification is needed, especially around control transfer and identification of performance obligations.
  - A more complete model is required before ultimate conclusions can be reached.
- Significant concern around the application of "control transfer", specifically whether it is intended to be overly legalistic.
- Most believe that the final standard should clearly address accounting for contract modifications.



## **Mobile TV**

Mobile TV is the wireless transmission and reception of television content to platforms that are capable of moving. Mobile TV allows viewers to enjoy personalized, interactive television with content specifically adapted to the mobile medium. The features of mobility and personalized consumption distinguish mobile TV from traditional television services. The experience of viewing TV over mobile platforms differs in a variety of ways from traditional television viewing, most notably in the size of the viewing screen.

The technologies used to provide mobile TV services are digitally based, and much of the terminology used in describing mobile TV reflects Internet phraseology. For example, the terms unicast and multicast are used in the same way they are used for Internet Protocol TV (IPTV). That is, unicasting is transmission to a single subscriber, while multicasting sends content to multiple users. These definitions also correspond to those given for similar Internet-based applications.

### **Technical aspects**

There are currently two main ways of delivering mobile TV. The first is via a two-way cellular network, and the second is through a one-way, dedicated broadcast network. Each approach has its own advantages and disadvantages. Delivery over an existing cellular network has the advantage of using an established infrastructure, inherently reducing deployment costs. At the same time, the operator has ready-made market access to current cellular subscribers, who can be induced to add mobile TV to the services they buy.

The main disadvantage of using cellular networks is that mobile TV competes with voice and data services for bandwidth, which can decrease the overall quality of the mobile operator's services. The high data rates that mobile TV demands can severely tax an already capacity-limited cellular system. Also, one cannot assume that existing mobile handsets can receive mobile TV applications without major redesign and replacement.

Many mobile service providers are providing Video on Demand (VOD) or streaming video. These services are mainly unicast, with limited transmission capacity. They are built upon the underlying technologies used in the mobile cellular system itself – GSM, WCDMA, or



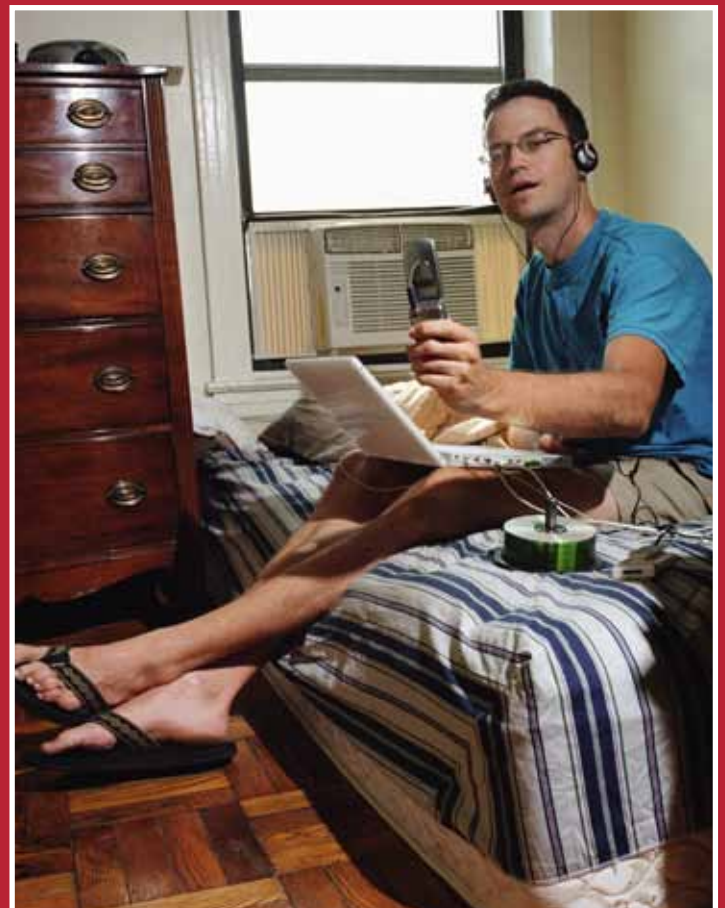
CDMA2000. An example of a technology designed to work on a 3G network is Multimedia Broadcast Multicast Service (MBMS), a multicast distribution system that can operate in a unicast or multicast mode. MBMS has been designed by the 3rd Generation Partnership Project (3GPP) to provide mobile TV services over existing GSM and WCDMA cellular networks. It operates in the 5 MHz WCDMA bandwidth, and it supports six parallel, real-time broadcast streaming services of 128 kbit/s each, per 5 MHz radio channel.

## Challenges for telecommunications operators

The increasing popularity of mobile TV brings a new challenge for telecommunications operators in a market that has been booming for the last decades. As a number of operators see the limits of their current network capacity rapidly approaching, it looks like additional capacity will be required to provide mobile TV services.

A serious issue may be whether operators will be able to provide sufficient bandwidth for a price that the market is willing to pay. Unlike other more recent services, such as internet browsing, instant messaging, and downloading, where the market still accepts a certain decrease in services during peak hours, mobile TV customers are unlikely to accept such a service decrease. The problem may even be opposite: traditional peak hours

in telecommunications services may be the peak hours for mobile TV demand as well, and certain events (sport championships!) may lead to an exponential demand for service. Customers are unlikely to continue buying this service when there is not a certain level of continuity. This level of service demand, added to the fact that the market prices will definitely drop after this service has lost its niche status, is currently one of the biggest challenges for telecommunications operators.





## **Updates on Transfer Pricing Issues**

The Indonesian tax office has issued guidelines on Mutual Agreement Procedure/MAP (Regulation No. PER-48/PJ/2010) and Advance Pricing Agreement/APA (Regulation No. PER-69/PJ/2010).

### **What is an APA?**

An APA is an agreement between the DGT and Taxpayers and/or other country's tax authority to agree the criteria and/or arm's length price between related parties.

An APA is used to solve the transfer pricing problems in related parties' transactions. A request for an APA comprises several steps and involves certain documents, which means that it may take at least three months to achieve an agreed APA.

### **What is a MAP based on a Tax Treaty?**

Most bilateral tax treaties typically include an article which establishes the mutual agreement procedures for eliminating double taxation and resolving conflicts in interpretation of the treaty. The MAP article in tax treaties allows the tax authorities of the treaty countries to interact with the intention of resolving international tax disputes. These disputes involve cases of double taxation (juridical and economic) as well as inconsistencies in the interpretation and application of a treaty. However, most MAP articles do not compel tax authorities to reach an agreement and resolve tax disputes. They are only obliged to make their best endeavors to reach an agreement.

# Controlled Foreign Corporation (CFC) Rule

Indonesian tax residents who own at least 50% of the paid-in capital (shares) in a qualifying foreign controlled corporation (CFC) – referred to herein as qualifying shareholders – are subject to the CFC rule. Unlike the previous (1994) CFC rule which was aimed at combating certain types of tax avoidance and tax evasion, the new CFC rule does not make any reference to such things and therefore must be applied even if the CFC is domiciled in a non-tax haven country. The only situation in which the rule is not applicable is where the CFC's shares are listed with a recognized stock exchange.

In summary the CFC rule requires the following:

- Qualifying shareholders are deemed to receive dividends from their CFC in the fourth month after the deadline of the annual corporate income tax return (CITR) filing in the relevant country. If there is no deadline for annual CITR filing or no requirement to file annual CITRs, the dividends are deemed to be received in the seventh month after the end of the tax year.
- The deemed dividends are determined proportionately with the shareholding percentage and must be based on the CFC's after-tax profits.
- The deemed dividends are to be reported by the shareholders of the corporation in its CITR for the respective year. The CFC's financial statements must be attached.
- The rule does not apply if the CFC has distributed dividends to the qualifying shareholders consistently with the CFC's formula before the designated months
- Any dividends received by qualifying shareholders in excess of the deemed dividends or not constituting part of the deemed dividends must be reported in the shareholders' annual CITR for the year the dividends are distributed.
- Dividends taxes paid or withheld abroad are claimable as tax credits for the qualifying shareholders for the year the tax is paid or withheld.

Accordingly, Indonesian telecommunications operators who own subsidiary overseas should comply with this CFC rule.

# Taxpayers' Benchmark Ratios

Recently, the Indonesian Director General of Taxation (DGT) has further expanded the range of industries for which it has collated and published benchmark ratios. Up to now, the DGT has released benchmarking guidelines for 100 industries including the following Technology, Information Communications and Entertainment (TICE) industries:

- Newspaper, journal, and magazine, publishing;
- Radio, television, voice and picture, recording tools, and their equivalents;
- Private radio broadcasting and national private television broadcasting.

The DGT has adopted a more sophisticated approach to the selection of tax audit cases. This involves using benchmark ratios to assess whether a taxpayer's affairs require further examination, which in turn may lead to a formal tax audit. The benchmarking is done based on the following criteria:

1. Gross Profit Margin
2. Operating Profit Margin
3. Pretax Profit Margin
4. Corporate Tax to Turn Over Ratio
5. Net Profit Margin
6. Dividend Payout Ratio
7. Input VAT to Sales Ratio
8. Salary Expense to Sales Ratio
9. Interest Expense to Sales Ratio
10. Rent Expense to Sales Ratio
11. Depreciation Expense to Sales Ratio
12. Other Variance to Sales Ratio
13. Other Income to Sales Ratio
14. Other Expense to Sales Ratio

The benchmarking information is to be used only as a supporting tool in assessing the tax compliance level of a taxpayer and a discrepancy in respect of any particular ratio does not in itself prove non-compliance by a taxpayer. The discrepancy may prompt a follow up from the account representative for a further explanation. If the review of the discrepancy reveals non compliance with the tax law, the account representative may request an amendment of the tax return or recommend that the taxpayer be subject to a tax audit.



# Staying relevant in a mobile data world

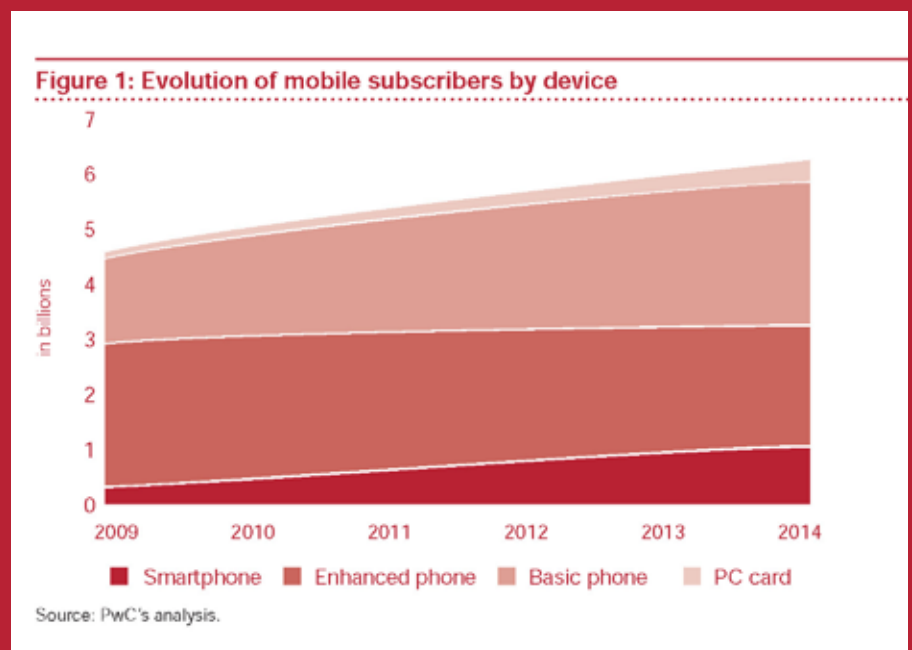
*“WHAT does the most populous Muslim nation do in its spare time? Increasingly, it swaps gossip online. Indonesia is now the world’s second-largest market for Facebook and the third-largest for Twitter, according to several web research firms. For industry insiders, however, the most exciting statistic is not how many Indonesians use social media, but how many still don’t. Of 230m or so Indonesians, fewer than 20% are connected to the internet.”*

(Eat, pray, tweet -- Social-networking sites have taken off in Indonesia. Who will profit? The Economist, 6 January 2011)

The declining unit price of voice in recent years, in both fixed and mobile markets, has led operators to innovate in services, with the data market seen as a vehicle to sustain or grow margins. Today, technological developments in broadband data rates and user devices are facilitating strong demand for evolving digital services.

Continuing to develop alongside the telecoms industry, social network service providers are bringing an increasing volume of media and application spending into the online domain. More users are connecting more often, over devices that are growing in number and sophistication, and are consuming richer content and applications that are ever more bandwidth hungry. The spectacular success of the recent smartphones with unlimited data plans has demonstrated the underlying consumer demand for these applications and services. That success drives further demand for more data and greater bandwidth.

PwC forecasts that smartphone penetration will continue to increase at the expense of enhanced handsets. We expect it to reach 17% of the global mobile-subscriber base by 2014 (55% in developed countries and 10% in emerging countries). (See Figure 1.)





More important than simply the penetration of devices is the fact that smartphones will become the dominant means of accessing the Internet on a portable handset. We forecast that 39% of mobile Internet subscribers will connect through smartphones by 2014, compared to only 13% today.

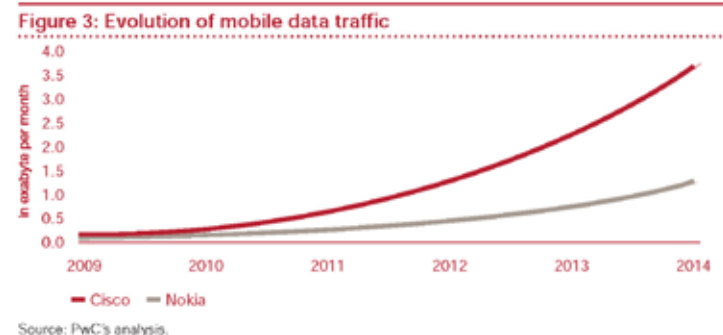
As manufacturers target low-cost smartphones and blur the boundaries with the “enhanced handset”, the stage is set for an explosion in mobile data through the creation of a truly viable, mass-market Internet-access option.

## Riding the runaway data train

The recent success of smartphone growth has been spectacular. In many cases, it has far outstripped operators’ own data projections, some of which have been wrong by 200% to 300% or more. As a consequence, the network demands (and the funding needs) have caught many of the most successful operators by surprise.

There is a major degree of uncertainty among mobile operators about how the average mobile data traffic per user will evolve. Some anticipate a relatively stable evolution, with early adopters’ above-average consumption mitigating the more modest requirements of normal users. Others expect that the average traffic per user will double every two years, as has been the case with the fixed Internet. This uncertainty is reflected in the difference between the forecasts from Nokia and Cisco shown in Figure 3.

Easy access to content has fuelled consumers in demanding more from handsets and from operators. Apple demonstrated the power of “ease of access” through the iPod, which revolutionized the digital music download market. That model has set the tone for the dramatic growth in mobile content and data consumption. Easy access drives demand. Unlimited data packages add fuel to the fire.



The Wireless Industry Partnership predicts that the number of smartphone users accessing application stores will quadruple by 2013. PwC forecasts that the mobile content market (excluding access) will reach €25 billion by 2014, with a significant contribution from wireless games—a large prize by any standard.

## Rebalancing the rising cost of data

All network technologies, whether fixed or mobile, have performance limitations, and a major component of cost is typically in access (and backhaul) networks. Data rates typically decline as the distance from the carrier’s core network node increases. Consequently, coverage is tightly coupled with capacity requirements; a high minimal-user-capacity requirement usually means lower coverage for a given cost, or higher cost if coverage is to be attained as a primary objective. Whilst modern technologies allow media service data to be compressed, these technologies, too, have limitations: Media can be compressed only so far (in data rate terms) before quality levels degrade beyond acceptable bounds. Finite cost means finite performance.

So what can be done at the network level? There is a mix of alternatives, from offloading—moving data traffic from the mobile wireless network to a more local radio access network and broadband backhaul, such as WiFi hotspots, femtocells, etc. — to new spectrum purchases, refarming, cell splitting and/or such network technologies as evolving HSPA and LTE. This mix will vary according to the operators’ competitive positions, their legacy network and investments and the requirement to differentiate propositions to different customer segments.

As competition develops and markets mature, services trend towards commodity—forcing carriers to compete on price and basic levels of quality. Service bundling can help in the near term but tends to erode margins and is no long-term solution. Normalized pricing (\$/Mbps) on fixed line Internet services in a number of countries has trended downwards over recent years.

In the mobile market, within both pre- and postpaid segments, operators in developed countries increasingly compete by offering more minutes, text and data within the price of a top-up or monthly contract. Customers are demanding and, more important, are getting more for less or the same. Willingness to pay does not necessarily increase in line with the data rate or the volume of data consumed.

Establishing unlimited data tariffs for the new generation of smartphones was one of the keys which ignited the mobile data explosion. Now, however, it is crucial for mobile operators to learn the lessons from fixed line and “rebalance” their tariffs in order to re-establish the links between supply and demand for mobile bandwidth. With

some operators announcing the end of unlimited data tariffs as they launch the next wave of smartphones, we are already seeing signs that this is happening.

However, there is no one-size-fits-all approach to this rebalancing. The greater the number of revenue generating units or “multiplay” services an operator provides to customers, the greater the degree of flexibility the operator has to change terms and conditions or pricing levers within the bundle.

Mobile operators need to take these lessons onboard — and fast.

## Reaching the inflection point

The delivery of services to data-hungry devices like smartphones is driving up the costs associated with providing greater bandwidth. As users proliferate, so too will the costs of serving them, to the extent that the cost of mobile data outstrips the ability to charge at a rate that consumers are willing to pay. Arguably, we have already reached this inflection point in customer segments where the cost of supplying their mobile bandwidth exceeds the associated revenues for the operators. As data demand per user and user volumes increase, carriers will find it harder and harder to offer acceptable quality levels and pricing will come under additional pressure.

The explosion of mobile data is far from being a straightforward good news story. If operators cannot find a way to monetize content and applications across their networks, will they follow the fate of many landline operators, becoming simply commoditized infrastructure providers that struggle to find ways of extracting additional value from their customers?

We have prolific, even exponential, data growth that drives significant costs for operators, declining bandwidth value and a large, non-access revenue opportunity that could bypass the operators altogether. It is no surprise that some operators are wondering how to put the genie back into the bottle.

The objective is to create differential value in bandwidth-hungry services (e.g. video, mail downloads, streaming services), whilst maintaining compatibility with any net neutrality regulation in an operator’s market. Who will be able to claim the prize is the major question. New business models — such as revenue-sharing open-application stores — are tearing down the last walls, and pose a significant risk that operators may miss out on the bulk of possible revenues.

## Forging new business models

The ability to survive and thrive in an open environment will call for a range of new business capabilities. Business models are going to have to become more collaborative and will rely on cooperation between businesses that, to date, have seen others solely as fierce competitors.

Ensuring that applications are available across all platforms means developing industrialized processes for creating services that will operate natively on any one of the many different platforms that devices may use and consumers can choose from. If no single dominant standard emerges, open source environments are likely to succeed in the future.

We are likely to see the emergence of a creative coalition between operators and OEMs that will enable developers and content providers, such as games companies, to produce applications and content easily for all phones and markets.

Operators, therefore, may well need to consider incorporating the costs of conversion into their revenue-sharing arrangements with developers.

The future of the operator-owned application store looks uncertain. The temptation for operators to push their own portal is strong; yet even with initiatives such as the World Mobile Congress Alliance, this requires the operators to demonstrate sufficient control or customer-intimacy in content delivery to prevent the consumer from going completely “off-portal”. What is more likely is that operators will seek to balance their own offerings against those available from other providers—much like a supermarket provides consumers with a choice between its own brand and other branded goods.

## Staying one step ahead of consumers

Increasingly, consumers make mobile choices according to the services and content they want rather than the intrinsic merits of a particular device. Also increasingly, they make those choices across all three screens—that is to say, across mobile, personal computers and television. For example, Facebook users routinely use both mobile and desktop applications to manage their social networking, and users now access YouTube more often from mobile devices than from desktop machines. Hulu, the video content provider, is among many in planning to expand its services to mobile. Music services, such as Spotify, Rhapsody and Last.fm, already integrate content seamlessly across desktops and personal devices.

To avoid the “off-portal” scenario described above, operators will have to leverage their existing advantages with consumers, including their longstanding relationships, their reputation for reliable service and their direct billing relationships.

Such existing characteristics may not hold the kind of differentiating creative and brand recognition that the operators’ marketing divisions crave. But they do provide a potentially valuable advantage in developing deeper relationships that do more than simply connect customers to services and content.

Personalization, location-based services and timeliness are all long-touted differentiators in the mobile content world, but intrinsically these are factors on which operators can capitalize better than most. By using the wealth of information they already have about their customers, operators can begin to offer more personalized and customized experiences, such as creating personal application bundles and monetizing user data through merchandising.

That information opens up a world of revenue opportunities. The opportunities range from Business-to-Business (B2B) services, such as mobile vouchers/ advertising that make the best offer to an individual walking past a store; to application bundles targeted at a specific consumer, which no third party developer could match; to the inevitably scatter-gun delivery route of an application store that might be home to more than half a million other applications.

## **Leveraging the power of many and of one**

The rise of social networking and viral marketing represents another major opportunity for operators—if they follow the right approach. The personal nature of mobile devices, arguably, makes them a more natural fit for social networking services than are their desktop equivalents. Recommendation and word-of-mouth are powerful drivers of consumer behavior, as demonstrated by online retailers such as Amazon, which use buyers’ comments to drive recommendations and sales.

Operators already have considerable data with which to build social networks. They can use their subscriber bases to develop communication within communities, focusing on local services and content in which they understand the market and what is likely to appeal to their subscribers.

They need to understand the core of where they can add value and, in particular, how to leverage their local consumer knowledge and deep relationship skills. The operators’ established, large-scale IT infrastructures,

together with their wealth of data and security that consumers prize, lends itself to micro-billing and aggregated payments alike.

Enabling the social networking element is key for the operators to be able to monetize the open application/content environment, whether by leveraging their multi-platform approaches or through their direct customer insight. More important, failing to create the link between communication, content and transactions means the operators are effectively relinquishing all control to the content providers and OEMs and resigning themselves to a bit-pipe status.

## **Creating an edge— a question of control and fast actions**

Operators, OEMs, developers and content creators are seeing a shift in the balance of control on multiple fronts. Content creators, service providers and handset manufacturers are all rolling out game-changing innovation to develop compelling offerings to consumers. To date, operators have been somewhat left behind.

To exploit the potential for growth and to manage risk, operators need to develop a clear, cohesive strategy across the business model, product, infrastructure and financial domains.

How operators respond in the immediate future will determine their prospects for the longer term as we enter a whole new mobile world. The consumer is on centre stage. Operators need to create the right user experiences and customer-centric approaches to maintain their relevance and their healthy share of the market.



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For further information on how PwC Indonesia can assist you, please contact one of the following specialists based in our Jakarta office:



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