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بسم الله الرحمن الرحيم Sudan Response to Questionnaire on the ITRs

- 1-1 a) The abidance of ITR provisions by the ROAs and OAs can be ensured by making it an integral obligation in their licences.
 - b) To ensure the abidance of ROAs and OAs by their licence obligations ,the national laws should be comprehensive. The regulatory functions in these laws should include adequate rulemaking and enforcement powers of the laws and decisions critical to the effectiveness of regulation.
- 1-2 In our opinion, the ITRs, Constitution ,Convention and Recommendations should be streamlined ,made simpler and more efficient and free of any duplications as a general rule.

Sudan Administration is in the process of scrutinizing the above instruments. Concrete proposal and their draft texts if any will be sent to ITU on or before November 15,2004.

- 2-1 The task of defining ITRs will not be difficult if the ITRs are of general nature and scope and have the flexibility to accommodate the fast pace of change in the telecommunication environment.
- 2-2 So far ,Sudan Administration has not detected any contradictions between its national regulations and the provisions of the ITRs .Nevertheless ,further scrutiny of the ITRs will conducted in this area.
- 2-3 In our opinion, the provisions of the ITRs are applicable to the provision of international telecommunication services arising out of the evolving telecommunication industry environment.

Sudan Administration has no issues on hand that are not covered by the current ITRs unless the scrutiny of the ITRs our administration plans to conduct proves otherwise.

3- Paragraph 1.6 of the ITRs may not be sufficient to guarantee efficient operation of telecommunication unless it is reinforced by specific provisions in the Constitution and Convention; a matter to be considered through the anticipated revisions of both instruments.