



Name of your Administration: National Post & Telecom Agency
Country: Sweden
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Questionnaire on the International Telecommunication Regulation (ITRs)

Below, please find the answers from the Swedish Administration.

1.1

The telecommunications industry and the environment in which it operates have changed substantially since the current ITRs were written in 1988. In particular, the ITRs are focused on cooperation rather than recognizing the competitive and liberalized conditions which exist on many international routes nowadays and which apply to most international traffic.

The Swedish Administration considers that ITRs, as written, are no longer relevant and that it is not possible or appropriate, to apply them in respect of liberalized routes.

1.2

Please see the European Proposal to PP-02, Addendum 5 to Document 10 (September 2002).

2.1

The Swedish Administration considers that the rapid rate of change in the current telecommunications environment, including the transition to the use of IP technology and the convergence of the industry with other communications and media activities would make the task of defining ITRs very difficult. In addition, the extended time-scale inherent in the World Conference on International Telecommunications process would inevitably mean that any modifications of the ITRs would be out of date before their entry into force.

2.2

The ITRs are potentially in conflict with the WTO/GATS for those countries which have made commitments under the GATS.

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The Swedish Authority is also of the opinion that ITR:s contradict the basic thrust of the European Community liberalisation of telecommunication as contained in a set of EC Directives adopted in 2002.

2.3

The Swedish Administration considers that the current ITRs are anomalous and do not attain the purposes of the ITU in promoting the development of telecommunication services and their efficient operation whilst harmonizing the development of facilities for worldwide telecommunications.

The Swedish Administration believes that the provisions are too detailed and inflexible and that more detailed provisions, to the extent such regulation is needed, would be better addressed in non-treaty instruments such as Recommendations, where they can be more easily amended.

The Swedish Administration also considers that the ITU is facing financial problems. The holding of a World Conference on International Telecommunications would substantially add to these financial problems whilst placing additional financial burdens on those Member States, in particular from developing countries, which would participate in the process leading up to the World Conference.

3

The Swedish Administration notes the problems outlined in the Council Working Group Documents ITR/001, 002 and 004 relating to the misuse of numbers allocated by the ITU. The Swedish Administration recognizes that these issues are serious and need to be addressed. However, it is not immediately clear that amending the ITRs would, by itself, address the problems identified.

Sincerely yours,

A handwritten signature in black ink, appearing to read 'Marianne Treschow', is written over the typed name.

Marianne Treschow
Director General