

Name of your Administration: SYRIAN TELECOM. ESTABLISHMENT.....

Country: SYRIAN ARAB REPUBLIC.....

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1) The International Telecommunications Regulations (ITRs) set many rules applicable to administrations and to recognized private operating agencies. There are also many operational details in the ITRs.

1.1 Taking into account that today many countries have liberalized the telecommunications sector and many Administrations do not themselves provide international telecommunication services, how do the Member States ensure the abidance of the ITRs provisions by Recognized Operating Agencies (ROA) and Operating Agencies (OA)³?

ANSWER : This is imposed on any operator in accordance with relevent provisions in Articles 1&4

1.2 In your opinion, which, if any, of the ITRs provisions should be terminated, retained in the ITRs, transferred to the Constitution or Convention, or embodied in ITU Recommendations? Please provide any proposed draft text for amending the Constitution and/or Convention, if deemed appropriate

ANSWER :

-ITRs provisions 2.7 ,2.8,2.9 and 2.10 are already covered by Recommendations

-ITRs provisions 1.2,1.3,1.6,1.7b,1.8,2.5,2.6,3.4 and 4.1 which have relation with purpose and scope of the regulations could be covered in the Constitution or Convention

-ITRs provision 6.1 which have relation with international network could be covered in recommendations

-ITRs provision 1.4 and the majority of provisions of Article 10 in particular 10.3&10.4 shall stay.

2) Taking into account the *considering a)* through *f)* and *believing a)* and *b)* of Resolutions 121:

2.1 Do you consider that the fast pace of change in the telecommunication environment could make the task of defining International Telecommunication Regulations difficult?

ANSWER : No,

2.2 Do you see some provisions of the ITRs contradicting your national regulations or regional regulations (e.g. EC directives) or other international instruments (e.g. WTO)?

ANSWER: Not applicable

2.3 Are provisions of the ITRs applicable for the provision of international telecommunications services arising out of the evolving telecommunications industry environment? Do you have any issues that are not covered by the current ITRs?

ANSWER : Yes , Arbitration is not covered Between operators of different countries , also using telecommunication facilities to pass Spam including criminal one (Phishing) is not covered as will as misuse of numbering ,address,no and naming plans .

3) Noting that the preamble of the ITRs refers to “most efficient operation” and that Paragraph 1.6 refers to “compliance with the relevant ITU-T Recommendations”, is Paragraph 1.6 sufficient to guarantee efficient operation of telecommunication, for example to ensure world-wide consistency, stability, and predictability of the E.164, E.212 and/or other numbering plans?

ANSWER: No,we recognized recently misuse of these plans
(see development at ITU-TS-G.2) also