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**Contribution from Austria, the Czech Republic, Denmark, Latvia, Lithuania, the Netherlands, Slovakia, Sweden and the United Kingdom**

REVIEW OF THE 2012 INTERNATIONAL TELECOMMUNICATION REGULATIONS

1. Austria, the Czech Republic, Denmark, Latvia, Lithuania, the Netherlands, Slovakia, Sweden and the United Kingdom welcome the opportunity to make this contribution to the second meeting of the Expert Group on the International Telecommunications Regulations (ITRs). We listened with interest to the discussion at the first meeting of the Group in February. We would like to thank all those who made contributions and in particular thank the chair for his efforts in taking the work of the Group forward.
2. The task of Expert Group is to undertake a review of the 2012 ITRs, not to develop a new set of ITRs or propose a new World Conference on International Telecommunications (WCIT). Some countries expressed a view at the first meeting of the Group, however, that we should identify and examine new issues and discuss possible amendments to the 2012 ITRs accordingly.
3. We have significant concerns about the uncertainty that would be caused by a new WCIT to make any such amendments. A new WCIT would open up a very wide range of issues for discussion and the uncertainty this would cause would make it difficult for operators to take decisions regarding regional or global investments.
4. In our view, the ITRs should remain focused on relevant international public telecommunications issues and they should not be extended to domestic issues or to other communication-related services, infrastructure or networks, including issues related to the Internet. We know that some other countries take a different view, however, so finding global consensus would be extremely difficult, and perhaps impossible. We are committed to strengthening the ITU as a consensus-based organisation and we believe we should avoid division.
5. We are not currently aware of any particular difficulties caused by the status quo or by conflicts between the 1988 and 2012 ITRs. Even if some significant difficulties were discovered, however, it would be important to take into account their scale and scope and their impact on cross-border services before considering whether a new WCIT could be justified.
6. We note in particular the significant costs of convening a WCIT. We agree with others who have pointed out, in ITU Council and elsewhere, that as well as the cost of the meeting itself, a new WCIT would require years of preparatory meetings, at national, regional and international levels, with considerable travel and personnel costs, and there would be very significant opportunity costs too.
7. The ITU and especially its members face many challenges over the coming years to increase investment in infrastructure and connectivity, to improve affordability, to build capacity and skills and to tackle the digital divide. Another re-negotiation of the ITRs would take away resources and attention from these critically important priorities. That is why we believe that we should avoid the uncertainty of a new WCIT and the risk of division between ITU members. Our priority and focus instead should be on delivering the 2030 Sustainable Development Agenda.

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