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| **Expert Group on the International Telecommunication Regulations (EG-ITRs)** |  |
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| **Sector Member Contribution**Bell Mobility (Canada); KDDI, NTT DOCOMO Inc. (Japan); BT (United Kingdom); AT&T, Verizon (United States of America) |
| REVIEW OF THE 2012 INTERNATIONAL TELECOMMUNICATION REGULATIONS |

The above ITU Sector Members have contributed to the work of the Experts Group on the International Telecommunication Regulations (EG-ITRs) through in-person participation and written contributions and appreciate that our viewpoints have been generally reflected in the draft 2.0 version of the Final Report to Council.

However, given the time that has passed since the Sector Member written contribution submitted to the September 2017 EG-ITRs meeting (*see* Document EG-ITRs-2/9-E), we would like to reiterate the following perspectives as some of the largest international operators engaged in the exchange of international traffic worldwide:

* Together, our companies exchange traffic with other operators to provide international telecommunication services to more than 220 UN recognized countries and territories. Based on our collective operational experience, the ITRs are no longer applicable to or relevant in today’s highly competitive international telecommunications market. Rather, our companies exchange virtually all international traffic globally through commercially-negotiated agreements; any traffic settled under the ITRs is negligible.
* The continued successful deployment and use of telecommunication infrastructure and services worldwide is mostly realized through policy frameworks that support ongoing innovation, market-based competition and private sector investment, and not through a treaty instrument.
* To date, our companies have not experienced any practical obstacles resulting from the implementation of the 2012 ITRs. Again, we expect this is due to the fact that virtually all international traffic is exchanged through commercial agreements.

We have appreciated the opportunity to contribute to the EG-ITRs discussion and wish to express our sincere appreciation to the ITR-EG Chairman and Regional Vice Chairmen for their excellent leadership in carrying out the work of the Group.