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| **Expert Group on the International Telecommunication Regulations (EG-ITRs) Fifth meeting – Virtual meeting, 30 September-1 October 2021** |  |
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|  | **Document EG-ITRs-5/9-E** |
|  | **27 September 2021** |
|  | **Original: English** |
| **AT&T, Bell Mobility Canada, KDDI, NTT DOCOMO, Telefonica, Verizon**  SECTOR MEMBER CONTRIBUTION ON  OVERALL OBSERVATIONS BASED ON THE PROVISION-BY-PROVISION EXAMINATION OF THE 2012 INTERNATIONAL TELECOMMUNICATION REGULATIONS | |

The above-referenced ITU Sector Members have contributed to the work of the Expert Group on the International Telecommunication Regulations (EG-ITRs) through both participation in meetings and written contributions. We appreciate the opportunity to share our observations on the provision-by-provision examination of the 2012 ITRs and reiterate the following perspectives:

* It is our view that the ITRs are not applicable to fostering the development of international networks and services, and not flexible enough to accommodate today’s dynamic marketplace and evolving technological landscape.
* Treaty provisions cannot keep pace with the rapid speed of technology development and innovation and become quickly outdated. Moreover, efforts to address technical issues in a treaty instrument may have the unintended consequence of impeding network operators’ ability to quickly respond to changing network environments.
* The continued successful deployment and use of telecommunication infrastructure and services worldwide is mostly realized through flexible policy frameworks that support ongoing innovation, market-based competition, mutually-agreed commercial agreements between providers, and private sector investment, and not through a treaty instrument such as the ITRs.

Based on discussions during the previous EG-ITRs meetings and as reflected in the Examination Table, we recognize that some EG-ITRs participants share our views, while others do not. Given these divergent positions it is not clear to us how any further discussions regarding the applicability and flexibility, or review of the ITRs, would lead to a different result. For that reason, we would not see a benefit in dedicating additional ITU resources to conduct future work on this matter once this EG-ITRs has fulfilled its Terms of Reference.

We have appreciated the opportunity to contribute to the EG-ITRs discussions and wish to commend the EG-ITRs Chairman and Regional Vice Chairs for their excellent leadership in supporting the work of this group.

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