



Telecommunications Authority of Trinidad and Tobago

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Ref No. 2/2/1/148/1

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18th August 2025

Dr. Cosmas Luckyson Zavazava
Director
Telecommunications Development Bureau (BDT)
International Telecommunications Union
Place des Nations, CH-1211 Geneva 20
Switzerland

Dear Mr. Zavazava,

Re: Consultation for the GSR-25 Best Practice Guidelines

The Authority refers to your letter dated 8th May 2025 inviting contributions on the matter at caption, particularly as it relates to regulators becoming *digital ecosystem builders*. Kindly see below our responses for your consideration:

- i. **Fostering innovation in regulatory approaches** – Regulators can cultivate an innovation-driven culture in regulatory work and decision-making by employing regulatory sandboxes and facilitating limited pilots to facilitate market entry. Regulators must also be prepared to demonstrate flexibility and reassess conditions introduced in traditional telecommunications markets and models, that may be prohibitive if they seek to maintain in the evolving telecommunications and digital services markets. The Authority has developed a regulatory sandbox approach with university institutions to promote local digital system innovation and has pursued test and development trials in collaboration with industry to showcase technological benefits and promote in-market experimentation.
- ii. **Adapting and enhancing regulatory capacity** – As it relates to regulatory mandates, decision-making and capacity, regulators do need to assess whether market innovations will promote digital inclusion goals and if not, develop mechanisms to ensure such market innovations contribute to digital inclusion and are available to all consumers of broadband services, whether in urban or rural setting, by private or community-based access and are accessible to as many members of society as possible, including elderly



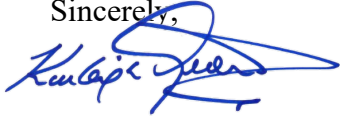
and differently-abled consumers. Regulators can consider using consultation mechanisms both with its industry and with fellow regulators to enhance regulatory responsiveness to emerging digital business models and evolving risks. Regulators can also pursue capacity development initiatives with partner regulators with more evolved digital markets to build familiarity with the emerging digital markets.

- iii. **Harnessing transformative technologies for regulatory excellence** – Regulators can seek to leverage digital tools that passively collect and provide access to big data to provide a means to quantitatively measure trends in telecommunications performance and use and proactively identify areas where there may be gaps or shortcomings. The Authority has recently leveraged big data to determine a metric for average broadband performance within the market over the past three years, to ensure broadband speeds within the market are trending positively while also monitoring the level of availability across different geographic regions in terms of assessing coverage obligations. The Internet of Things creates an opportunity for additional data collection which can be used to inform digital policy goals and progress, while Artificial Intelligence can provide a means for efficient data validation and analysis for determining meaningful implementation actions.
- iv. **Cross-border cooperation and building national, regional and global digital ecosystems** – Regulators can share data collected, even when the data sets are not available publicly, while preserving appropriate anonymity, to ensure regulators can adopt common approaches and more effectively address challenges that span multiple regions in a coordinated and effective manner. Regulators should also seek to support compliance efforts of its fellow regulators, since in the evolving digital ecosystem marketplace, digital service providers registered and/or authorised in one market provides services in multiple other markets. For example, cyber-attacks in one country or region typically emanate from perpetrators using services in other regions, therefore increased coordination between service providers and regulators is necessary to ensure consumer protection from a global perspective.

Additionally, regulators that share a common linkage, such as being members of the same regional socio-economic community, can develop a harmonised approach to address regulatory matters, such as spectrum management or the impact of over-the-top services to the telecommunications marketplace.

The Authority trusts its contribution is useful and can be considered as part of the deliberations of GSR-25.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Kurleigh Prescod', with a large, stylized flourish extending from the end.

Kurleigh Prescod
Chief Executive Officer