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| **Expert Group on the InternationalTelecommunication Regulations (EG-ITRs)** |  |
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| America Movil, AT&T, Bell Canada Mobility, Telefonica and Verizon[[1]](#footnote-1)  |
| **Joint Response to CITEL Questions on the ITRs** |

In response to the request of the Vice-Chairman for the Americas Region of the Expert Group on the International Telecommunication Regulations (EG-ITRs), the above-listed companies jointly submit the below replies to CITEL Questions on the ITRs. We appreciate the opportunity to provide our views.

**Q1. Do you use the ITRs? If so, how? If not, why?**

Together, our companies exchange traffic with other operators to provide international telecommunication services throughout the Americas region and in total, 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 Based on our collective operational experience, the ITRs are no longer applicable to or relevant in today’s highly competitive international telecommunications market.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.

**Q2. In the current international telecommunications/ICTs environment, are the 2012 ITRs applicable in fostering the provision and development of international telecommunication/ICT services and networks? Please give examples.**

Over the past two decades, international and domestic telecommunication markets have experienced significant structural and technological transformations. Today, the emergence of multiple competing private-sector operators in each country has resulted in a competitive landscape that does not require any treaty instrument like the ITRs. 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 such as the ITRs.

**Q3. In the current international telecommunications/ICTs environment, are the 2012 ITRs flexible to accommodate new trends in telecommunications/ICT and emerging issues? Please give examples.**

As stated above, the ITRs are no longer applicable to or relevant in today’s highly competitive international telecommunications market. 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.

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1. Telecom Argentina also supports the joint response to the CITEL questions on the ITRs. [↑](#footnote-ref-1)