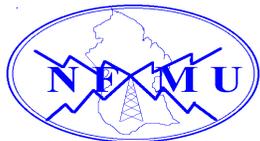


NATIONAL FREQUENCY MANAGEMENT UNIT



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January 08, 2000.

Mr. Yoshio UTSUMI
Secretary-General
International Telecommunication Union
Place des nations
Ch – 1211 Geneva 20,
Switzerland

Attention: Mr. Arthur Levin

Dear Sir,

Further to circular letter DM –1187, requesting comments from Member States and Sector Members on the Second Draft Report of the Secretary- General on IP Telephony, Guyana is pleased to submit its comments.

Overview

Guyana strongly supports your efforts to focus and bring to the forefront the important issues and considerations to be contemplated by Developed and Developing Countries in the implementation and possible regulation of IP Telephony in this rapidly changing environment.

Your Second Draft report has provided some important issues for consideration, specifically on the concept of introducing Regulation to IP Telephony and VoIP systems.

Presently the Internet in Guyana is unregulated and is used primarily for data communication, with some amount of IP telephony traffic using the PSTN. Although there is no restriction to web sites that support IP telephony, its use is restricted due to the poor quality of communication and long delays involved in signal transfer, caused by limited bandwidth availability from our incumbent operator, the Guyana Telephone and Telegraph Company Ltd.

Note – all ISPs are connected to the world wide web via the incumbent operator.

Comments on the Second Draft Report on IP Telephony of the Secretary-General

The Draft Report provides some useful insights on the technical, economic, and regulatory aspects of IP and VoIP Networks, highlighting their differences and the various approaches to encourage its growth and applications.

However there is need for statistical evidence to support the assumption that IP and VoIP traffic will exceed the traffic over the circuit switched network and the possible implication that this might have for developing countries with an incumbent operator.

Section 1.8 presents a very important and contentious position on the issue of IP Telephony, especially in an environment preparing for liberalization such as Guyana, and we would appreciate if this issue can be further discussed and elucidated.

The balanced view provided in section 3 on the Economic Aspect of IP Telephony and its Impact on Member States and Sector Members and the discussions on market aspects and economic benefits are well commended. However, Section 3.5 should elaborate more on the issue of revenue generating opportunities created by this technology for the benefits of regimes that are moving towards liberalization.

Guyana finds favour with the proposal made in section 3.1,1 however there are many limitations for third world country such as Guyana where IP Telephony is at its infant stage.

While section 4 of the draft report provides an excellent overview of the Policy and Regulatory Issues for IP Telephony and cites some examples of the approaches by other administrations, it should consider and expound on the benefits and/or implications of such actions as taken by those administrations.

Guyana views Human resource development as an essential ingredient in this transition from the traditional PSTN to the new IP Telephony era, and would require assistance in this area.

(Kindly note that Guyana has embarked on a telecom modernization, which is geared at creating an environment to modernize, and liberalized the telecom sector in Guyana within 2 years).

Should you require any further information or clarification, please contact Mr. Radjesh Azore, Assistant Engineer or the undersigned.

All for your information.

Yours faithfully,

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Seo Persaud
Chief Executive Officer