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The Secretary General
International Telecommunication Union
Place des Nations
CH-1211 Geneva 20
Switzerland

Dear Secretary-General Utsumi,

Please accept our warm congratulations on producing a report that succeeds in drawing together the varied and complicated issues that characterise the provision of VoIP, and of Internet services more broadly. Your treatment of all relevant issues – both policy, economic, and technical – is essential to the Forum's developing a useful output.

With a fibre optic network that will extend 7,000 km by the end of June 2001, ipsaris currently offers extensive broadband coverage across Europe. In 2001 we will offer services to clients across continents. ipsaris provides tailored solutions to other telecommunications operators who want to build national networks, as well as to ISP's and other users. Our network is based upon ring topology, and is being constructed to enable high quality bandwidth from E1 through to STM-64 and individual 10 Gigabit wavelengths.

Given ipsaris' developing position as a global service provider, we believe there are several additional matters that could be reflected in the next iteration of your report. The first calls for a more detailed reflection of the rationale of those Administrations that do not regulate the services discussed by the report. More than just a vehicle for the several Opinions that will result from the Forum, this document can go far in summarising the principal motivations of Regulators who have already addressed themselves to the question of regulating internet services, and who have decided not to do so. Noting the reasons for which they have come to such a decision may save time and be a useful record for deliberations of other affected parties.

Secondly, we believe the report could be usefully augmented if it recorded examples of national policies that have been conducive to network infrastructure development. Indeed, the associated Opinions could specify those types of regulation that administrations can adopt to encourage such development. It would, in this way, serve to provide additional guidance to Administrations seeking advice in the development of IP networks.

ipsaris is determined to support the work of the Forum, which includes supporting the broadest preparatory efforts possible. We stand prepared to assist you in any way we can as you prepare for this important event.

Regards,

Ruth Hine

Regulatory Affairs Manager
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