



National Telecommunications Regulatory Commission (Grenada)

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Mr. Embert Charles
Managing Director
Eastern Caribbean Telecommunications Authority
P.O Box 1886
Vide Bouteille
Castries
St. Lucia

Dear Mr. Charles,

**Re: Commence on Voice over Internet Protocol (VOIP) IP telephony
Regulation Consultation**

The National Telecommunications Regulatory Commission has reviewed the consultation document and hereby submits our response to the following list of recommendation.

1. ECTEL recommends that VoIP be regulated under the existing regulatory regime.

Res: Yes

2. ECTEL recommends that VoIP providers be categorized into two broad categories, namely:

- (1) facilities based providers who under the current system would be individual licensees entitled to own, maintain and operate a telecommunications network, and

Res: Yes agree

- (2) service based providers who lease network elements from locally licenced network operators/individual licensees, to resell services.

Res: Yes agree

3. ECTEL recommends that VoIP specific obligations be imposed on individual licensees using existing licences.

Res: yes

4. ECTEL recommends that service based/class licence VoIP providers be regulated via means of a new, VoIP/IP Telephony class licence (a draft of which is attached to this document.)

Res: yes

5. ECTEL recommends that it should forebear from regulating peer to peer social networks and internet telephony services (i.e. these services should be unregulated.)

Res: yes they should be excluded

6. ECTEL recommends that VoIP providers should be provided with geographical numbers without discrimination.

Res: Yes the Singapore situation can be adopted

7. ECTEL recommends that the allocation of numbers should be facilitated by the regulator as opposed to incumbent network operators.

Res: Yes

8. Subject to ECTEL's ability to make appropriate recommendations into the future, ECTEL recommends that no obligations on number portability be imposed at this time on either category of VoIP provider.

Res: NO: number portability should be taken into account. This regulation should be left open for the amendment of such regulation in the future

9. ECTEL recommends that service based VoIP providers be treated as customers of incumbent PSTN operators required to negotiate commercial agreements to provide services.

Res: yes. It should follow a similar approach as the interconnection agreement model but not ridged to avoid monopoly competitions by facilities based operators

10. ECTEL further recommends that agreements between service based VoIP providers be subject to regulatory review and approval by the NTRCs and ECTEL.

Res: yes

11. ECTEL recommends that no rules should be developed to regulate IP to IP calls in the short to medium term.

Res: yes agreed

12. ECTEL recommends that the provision of access to emergency services be discretionary for service type VoIP providers in the short term.

Res: yes the Canadian policy and the United Kingdom ofCom model can be adopted. However, the access to emergency services should be only be mandated by facility based operator due to they reliability of having control over their network.

13. ECTEL recommends that both categories of VoIP provider be required to provide clear information to customers about the limitations of VoIP services in the event of, for example, the failure of the broadband connection or power outages.

Res: yes

14. ECTEL recommends that no new or extra Quality of Service standards be imposed over and above existing standards already required of individual licensees and resellers in existing legislation in force in ECTEL states.

Res: yes

15. ECTEL recommends that facilities based/individual licensees should be required to provide directory enquiry services for subscribers of other licensees.

Res: No, the commission believes that each facility based /individual licensees should only provide directory enquiry services for their own network.

16. Providers should be fixed with a general obligation to work closely with law enforcement agencies where requested.

Res: Yes

17. ECTEL does not recommend the adoption of any specific rules on security of VoIP services at this time.

Res: No ECTEL need to adopt ICT security laws (or ITU standards) to ensure that good Quality of Service standards are keep for local IP phone call services. Nevertheless, peer to peer social networks and internet telephony services is rather much indefinite; therefore it can be left unadoptable according to your commentary on security (section 4.20).

18. ECTEL recommends that existing rules on privacy protection applicable to all existing licensees should be extended to VoIP providers.

Res: yes