



**National Telecommunications Regulatory Commission  
St. Vincent and the Grenadines**

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Ref. No. COR/ECTEL

June 23, 2009

**Mr. Embert Charles  
Managing Director  
ECTEL  
Vide Boutielle  
P. O. Box 1886  
St. Lucia**

Dear Sir

**Consultation- Policy on the regulation of Voice over Internet Protocol**

The Commission having reviewed and discussed the consultation document wishes to comment as follows:

1. First, ECTEL has proposed that new guidelines be used in the way persons submit comments to their consultation documents. The Commission is of the view that before new guidelines is implemented; stakeholders should be given an opportunity to comment on the proposed new process.
2. As it relates to the consultation document itself the Commission has a fundamental issue with the document as a whole. VoIP /IP are not services but technologies. Our existing regulatory framework does not regulate technologies but services. If we are to start regulating VoIP/IP we would need to review our whole regulatory framework and policies. The Commission would appreciate if ECTEL reviews our June 4, 2009 letter on the subject of ISVR licences. Our letter raises a number of issues that are directly related to this consultation document.

In closing the Commission recommendation would recommend not to create any new regulatory provisions to regulate VoIP/IP telephony. This will be a temporary solution to the issue(s) at hand and not fit in with our

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current regulatory model. If there are specific regulatory issues that have arisen due to VoIP/ IP technologies then we can address these in general regulatory provisions that would also apply to similar services based on other packet technologies that currently exist or will exist in the future. If we were to proceed with this proposal what will we do when we have "Voice over ATM" or "Voice over Ethernet"? These are all technologies but the service is still "voice" that needs to be regulated under technology neutral regulation as we have been doing to date.

The Commission wishes to express our appreciation for being given an opportunity to comment on this consultation document.

Sincerely yours



Apollo Knights  
Secretary/Director  
NTRC

Cc Mr. Cyrus Reynolds-Chairman/Board of ECTEL  
Mr. Isaac Solomon- Director/Board of ECTEL