



CARIBBEAN PERSPECTIVES ON THE INTERNATIONAL TELECOMMUNICATION REGULATIONS

SURVEY ANALYSIS REPORT

JUNE 2025



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CARIBBEAN PERSPECTIVES ON THE INTERNATIONAL TELECOMMUNICATION REGULATIONS

The International Telecommunication Regulations (ITRs) are a key global treaty under the International Telecommunication Union (ITU) and are designed to facilitate worldwide interconnection and interoperability of telecommunication services. Currently, the ITU Council's Expert Working Group on the International Telecommunication Regulations (EG-ITRs) is assessing whether there is a need to convene a World Conference to update the ITRs.

On April 15th 2025 the CTU in collaboration with the Caribbean Association of National Telecommunications Organizations (CANTO), held a webinar entitled "International Telecommunications Regulations (ITRs) – Determining a Caribbean Perspective". Given the significance of this issue, the CTU engaged Caribbean stakeholders, and particularly telecommunications and ICT service providers, to gather perspectives on how the region's interests should be represented in the ITRs discussions.

The objectives of the webinar were to provide participants with a comprehensive overview of the history and current status of the ITRs and to begin examining their specific application in the Caribbean context. The webinar sought to elicit key operational issues facing regional stakeholders; explore effective strategies for gathering Caribbean-wide feedback on the ITRs; and ultimately inform preliminary views to assist policymakers in formulating the region's position on this important international Treaty.

In furthering the collation of Caribbean perspectives and needs, the CTU subsequently conducted a brief survey with Caribbean stakeholders to gather perspectives on how the region's interests should be represented in the ITRs discussions. This report outlines the information gathered during that survey exercise.

1. RESPONDENTS' PROFILE

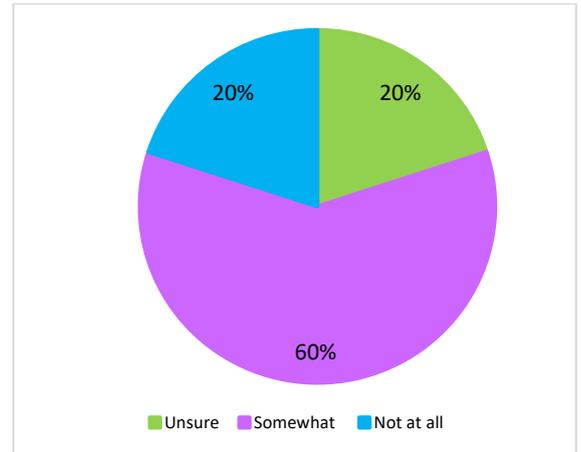
The CTU received ten responses from nine countries. Of those ten respondents, there were six regulators, two operators, and two government officials. The nine countries from which responses were received are:

- Belize (Regulator)
- Dominica (Regulator)
- Grenada (Government Official)
- Guyana (Government Official)
- Montserrat (Regulator)
- Saint Vincent and the Grenadines (Regulator)
- Suriname (Regulator)
- The Bahamas (Operator)
- Trinidad and Tobago (Operator and Regulator)

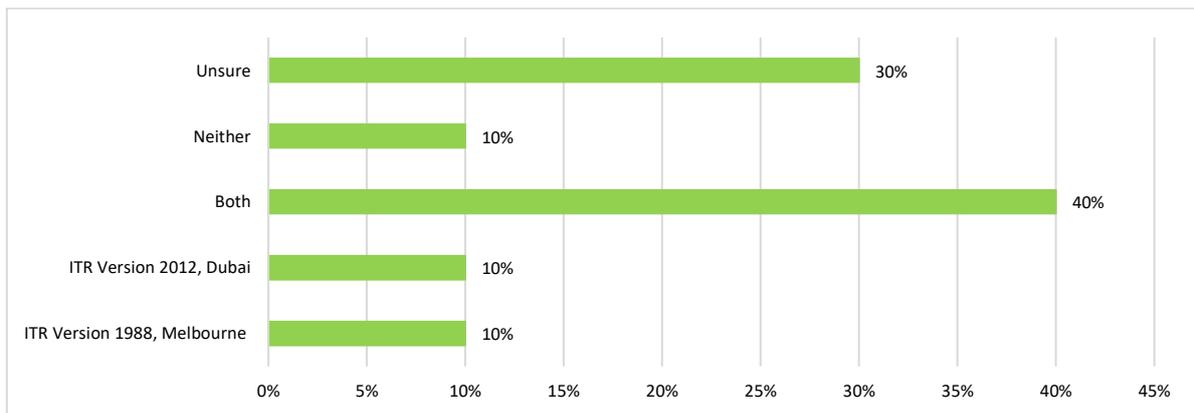
2. ITR USAGE AND APPLICABILITY

When asked to what extent the ITRs are in practical use within their country/organisation (Question 1), 60 percent of the respondents stated that they were somewhat in use, with 20 percent of respondents indicating that the ITRs were not in use at all. A further 20 percent of respondents were unsure of the ITRs practical use with their organisation/country.

Of the 60 percent of respondents who indicated that the ITRs were somewhat in use, three were regulators, two were government officials and one was an operator.

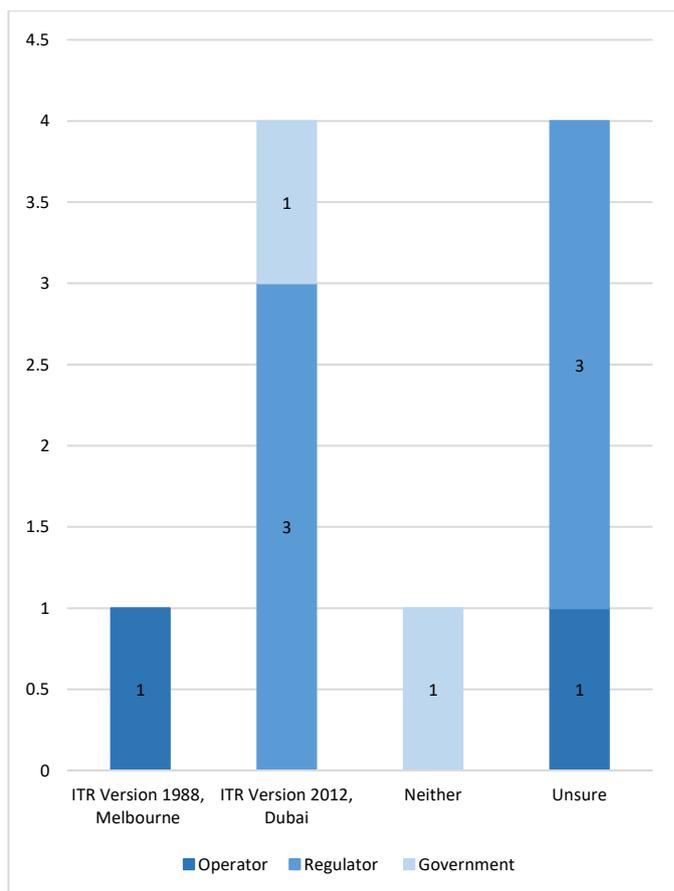


The questionnaire sought to gauge which version of the ITRs the respondents' country/organisation utilised (Question 2), the results of which are shown below.



40 percent of the respondents; which included one operator, one regulator and two government officials; indicated that their country/organisation utilises both versions of the ITRs. Conversely, ten percent of the respondents (one operator) stated that their country/organisation utilises ITR Version 1988, Melbourne, while another ten percent of respondents (one regulator) confirmed that their country/organisation utilises ITR Version 2012, Dubai.

The survey further explored which version of the ITRs the respondents believed was more fit for purpose for their country/organisation (Question 3). The responses to this question are shown below.



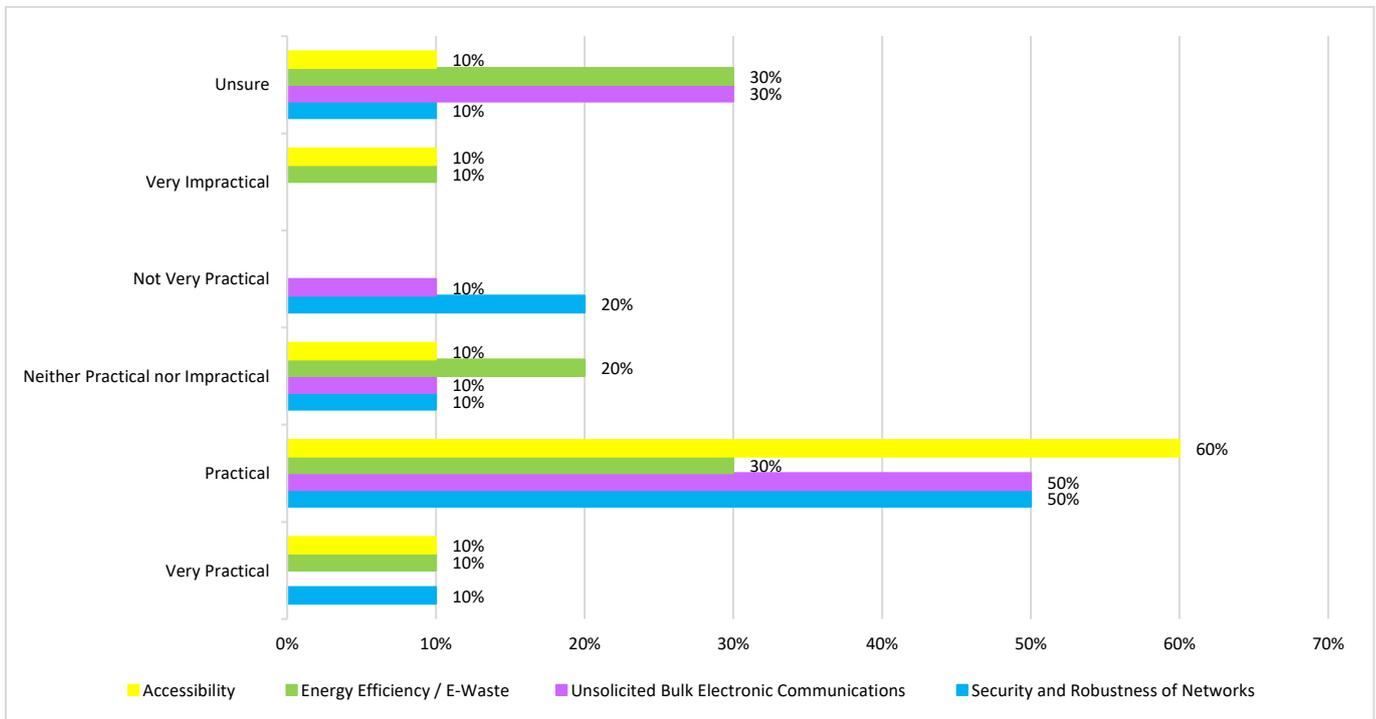
Of the responses received, 40 percent of the respondents (which included three regulators and one government official) indicated that they believed the ITR Versions 2012, Dubai was more fit for purpose for their country/organisation, while conversely 10 percent of respondents (which equated to one operator) attested the same in relation to ITR Versions 1988, Melbourne. 10 percent of the respondents stated that they believed neither version of the ITRs was more fit for purpose for their country/organisation, while 40 percent of respondents were unsure.

Given that 40 percent of the respondents to this question were unsure, a recommendation can be made to facilitate an information session with Caribbean stakeholders to allow for a better understanding of the ITRs and what they entail.

When asked to expound on the applicability of the two versions of the ITRs to the respondents' relevant countries/organisation (Question 5), the following feedback was garnered:

- The ITRs were somewhat relevant to the liberalisation at the dawn of the 21st century (Regulator, Dominica)
- The ITRs Version 1988, Melbourne, provide a very specific scope of provisions guiding international telecommunications services and interconnection specifically. The ITRs Version 2012, Dubai appears focused on IP-based networks, which present another dynamic for traffic flows, business models, and ultimately how accounting would be applied. (Operator, Trinidad and Tobago)
- Both the ITRs Version 1988, Melbourne and ITRs Version 2012, Dubai provide legislative and policy guidance that are practical and clear. (Operator, The Bahamas)
- The ITRs remain an important framework but are increasingly outdated. Most of Grenada's regulatory decisions are made within regional mechanisms such as ECTEL, with reference to ITU recommendations, international best practices and CARICOM frameworks. The ITRs require modernisation to reflect the reality of cross-border data flows, OTT services, content regulation challenges, AI, cybersecurity, and resilience in SIDS. (Government Official, Grenada)
- Caribbean ISPs are still required to pay to exchange internet traffic on Tier 1/2 ISPs. (Regulator, Trinidad and Tobago)

Paying more specific attention to the articles contained in ITRs Version 2012, Dubai, the respondents were asked to rate the practicality of use of these articles within their country/organisation (Question 6). Their responses are highlighted in the chart below.

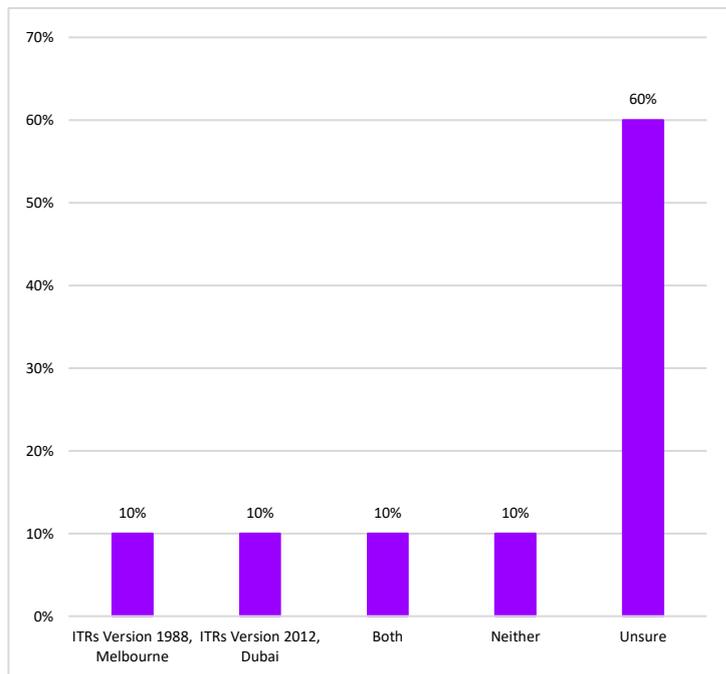
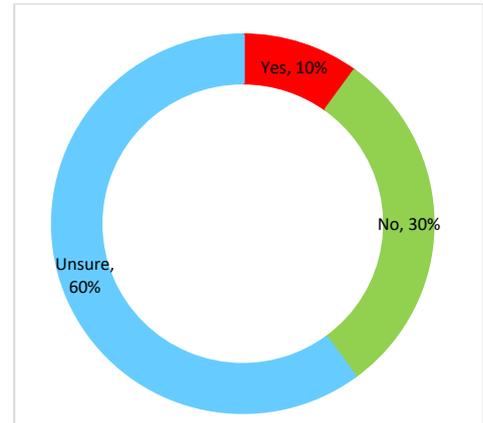


Ten percent of respondents believed that the accessibility, e-waste, security and robustness of networks articles contained with the ITRs Version 2012, Dubai were very practical for use within their country/organisation.

The majority of respondents, 60 percent, indicated that the article on accessibility in the ITRs Version 2012, Dubai was practical for use within their country/organisation, while 50 percent of respondents stated the same for the articles pertaining to unsolicited bulk electronic communications, and security and robustness of networks. 30 percent of respondents held a similar perspective regarding the article on e-waste.

Conversely, 20 percent and 10 percent of respondents stated that the articles on security and robustness of networks, and unsolicited bulk electronic communications respectively were not very practical for use by their country/organisation. While ten percent of respondents indicated that the articles on accessibility and e-waste were very impractical for use by their country/organisation.

When asked whether the existence of two versions of the ITRs cause operational difficulties in their respective countries/ organisations (Question 7, as shown in the chart to the right), 60 percent of respondents were unsure of whether such operational difficulties exist as a result of the two versions of the ITRs. While 30 percent of respondents (which included two operators and one regulator) indicated that the two versions of the ITRs does not cause operational difficulties in their country/ organisation while ten percent of respondents (one government official) stated that they do in fact result in such operational difficulties.



When asked which version of the ITRs, in their opinion, presents more operational difficulties for their country/organisation (Question 8), the significant majority of respondents, 60 percent, were unsure.

The responses to this question are highlighted in the chart to the left.

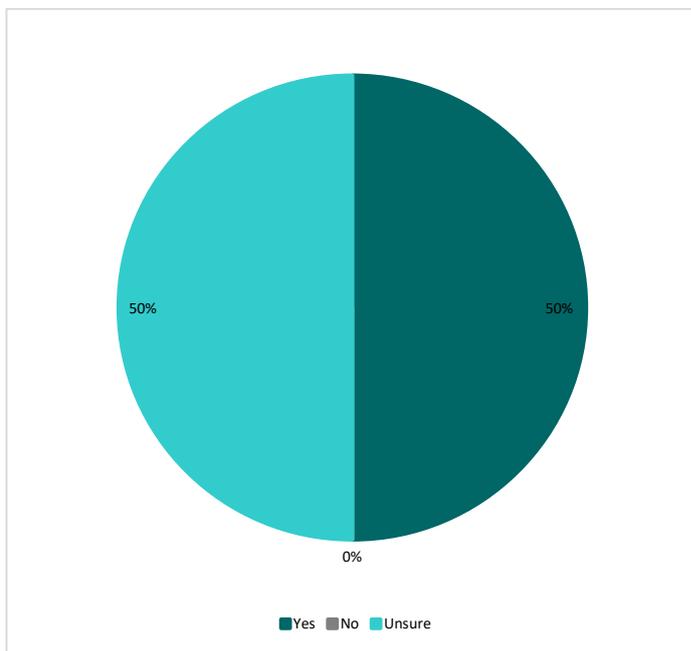
Respondents were also asked to elaborate or provide comments regarding their answers to the questions of whether the existence of two versions of the ITRs cause operational difficulties in their respective countries/ organisations, and which version of the ITRs, in their opinion, presents more operational difficulties for their country/organisation (Question 9). The comments provided are highlighted below:

- Quality of service is a significant issue with 4G and 5G and what’s ahead. (Regulator, Dominica)
- Within the Caribbean, the majority of countries are still subject to the ITRs Version 1988, Melbourne by virtue of not implementing the ITRs Version 2012, Dubai by the few signatories to same. Therefore, the question of operational difficulties becomes a moot point. (Operator, Trinidad and Tobago)
- Both ITRs do not diverge to any great extent. ITRs Versions 2012, Dubai introduces new considerations that have come to the fore. (Operator, The Bahamas)

- The ITRs Version 1988, Melbourne reflects a pre-internet, pre-convergence world. Today’s regulatory challenges – cross-border digital services, global platforms, AI, cybersecurity, data governance, submarine cable resilience, and universal access – require clearer international coordination. For SIDS like Grenada, modern realities demand updated global rules. (Government Official, Grenada)

3. INTERVENTION AND ADVOCACY

A key question asked in the questionnaire was whether respondents were of the opinion that intervention at the ITU level is needed to support Caribbean operators and administrations regarding the ITRs (Question 10), the answers to which are shown in the chart below.



None of the respondents responded negatively when asked whether intervention at the ITU level is needed to support Caribbean operators and administrations regarding the ITRs. Instead, 50 percent of the respondents indicated yes, and 50 percent were unsure.

Of the respondents who indicated that such intervention was necessary, three were regulators and two were government officials. Of the respondents that stated they were unsure whether such intervention was needed, three were also regulators and two were operators.

When asked to state the types of intervention needed at the ITU level to support Caribbean operators and administrations regarding the ITRs (Question 11), there were varied responses which included:

- ITRs Articles 8: Charging and Accounting (Regulator, Suriname)
- Health and safety issues regarding electromagnetic fields and satellite debris (Regulator, Dominica)
- Focused, narrow, provisions guiding the core of international telecommunication services (Operator, Trinidad and Tobago)
- Data sovereignty for SIDS (Operator, The Bahamas)
- Technical assistance to support the development of the appropriate enabling frameworks, implementation, and monitoring and evaluation (Government Official, Guyana)

- Modernisation of the ITRs; clearer framework for OTT services; cybersecurity provisions; small state provisions; cross-border data flow principles; satellite regulations; emergency telecommunications and disaster risk reduction; environmental sustainability (e-waste and energy efficiency); and capacity-building and institutional strengthening (Government Official, Grenada)
- Specifically, Article 8 of the ITRs (Charging and Accounting) requires intervention at the ITU level as Caribbean ISPs are still required to pay to exchange internet traffic on Tier 1/2 ISPs (Regulator, Trinidad and Tobago)

In elaborating further, the Operator from Trinidad and Tobago indicated that:

At the international level, there should still be focused, narrow, provisions guiding the core of international telecommunications services. Notwithstanding, there are various issues affecting the telecoms regulatory environment in the Caribbean vis-a-vis fair competition, equal treatment to all providers of interpersonal communication services, harmonised enabling environment, and fit-for-purpose regulations, among other things, which are not within the purview of an international treaty but rather regional agreements to be developed.

Also providing further explanations on the types of intervention needed for Caribbean operators and administrations at the ITU level was the Government Official from Grenada who stated that the types of interventions needed include:

- Comprehensive Modernization of ITRs — to address convergence of telecoms, data, content, and digital services.
- Clearer Framework for OTT Services — to recognize jurisdictional challenges of non-facilities-based providers (Not adequately addressed in either version).
- Cybersecurity Provisions — international norms on cybersecurity, cyber incidents, capacity-building (strengthening Article on Security and Robustness of Networks).
- Small State Provisions — recognizing the particular vulnerabilities of small states to service disruptions, cyber threats, and resilience challenges.
- Cross-border Data Flow Principles — addressing data sovereignty, privacy, and interoperability.
- Satellite Regulations — reflecting growing reliance on LEO/MEO/GEO satellite constellations for universal access.
- Emergency Telecommunications and Disaster Risk Reduction — expanded emphasis on telecom resilience, interoperability in emergencies, and climate resilience of telecom infrastructure.
- Environmental Sustainability (E-Waste and Energy Efficiency) — clearer, enforceable commitments adapted to SIDS capacities.
- Capacity-Building and Institutional Strengthening — include targeted support for regulators in the Global South and SIDS to adapt to rapidly evolving technology.

Grenada went further to strongly support Caribbean regional coordination on those listed matters and urged that any revision of the ITRs:

- Avoid one-size-fits-all solutions;
- Protect SIDS' unique vulnerabilities;
- Support resilient, inclusive, and affordable digital transformation;
- Ensure balanced regulatory frameworks that enable investment while protecting sovereignty, consumers, and critical infrastructure.

APPENDIX ONE: LIST OF RESPONDENTS

| | COUNTRY | NAME OF ORGANISATION / MINISTRY | SECTOR |
|----|----------------------------------|---|---------------|
| 1 | Belize | Public Utilities Commission | Regulator |
| 2 | Dominica | NTRC-Dominica | Regulator |
| 3 | Grenada | Ministry of ICT (Office of the Prime Minister) | Government |
| 4 | Guyana | Organization of Caribbean Utility Regulators | Government |
| 5 | Montserrat | MICA/Government of Montserrat | Regulator |
| 6 | Saint Vincent and the Grenadines | National Telecommunications Regulatory Commission (NTRC) | Regulator |
| 7 | Suriname | Telecommunications Authority Suriname | Regulator |
| 8 | The Bahamas | Bahamas Telecommunications Company | Operator |
| 9 | Trinidad and Tobago | Liberty Caribbean/FLOW (formerly Cable & Wireless Communications) | Operator |
| 10 | Trinidad and Tobago | Telecommunications Authority of Trinidad and Tobago | Regulator |

APPENDIX TWO: ITRs QUESTIONNAIRE



Caribbean Perspectives on the International Telecommunications Regulations (ITRs)

The International Telecommunication Regulations (ITRs) are a key global treaty under the International Telecommunication Union (ITU) and are designed to facilitate worldwide interconnection and interoperability of telecommunication services. Currently, the ITU Council's Expert Working Group on the International Telecommunication Regulations (EG-ITRs) is assessing whether there is a need to convene a World Conference to update the ITRs.

Given the significance of this issue, the CTU, via this questionnaire, is engaging Caribbean stakeholders in order to gather perspectives on how the region's interests should be represented in these discussions. Kindly therefore complete this short questionnaire gauging your awareness and use of the ITRs by June 6, 2025 in order to inform Caribbean positions on the ITRs in time for sessions of the ITU Council and its groups later in June and in the coming months. Your feedback is fundamental to proper representation of Caribbean interests.

Useful Links:

[Presentation on ITRs](#)

[ITRs 2012 \(Dubai\)](#)

[ITRs 1988 \(Melbourne\)](#)

Country:

Name of Organisation / Ministry:

Sector:

- Operator
- Regulator
- Government
- Other

ITR Usage & Applicability

1. To what extent are the ITRs in practical use within your country/organisation?
 - To a large extent
 - Somewhat
 - Not at all
 - Unsure

2. Which version of the ITRs does your country/organisation utilise?
 - 1988, Melbourne
 - 2012, Dubai

- Both
- Neither
- Unsure

3. Which version of the ITRs do you believe is more fit for purpose for your country/organisation?

- 1988, Melbourne
- 2012, Dubai
- Neither
- Unsure

4. In which version of the ITRs were the following articles, contained within each version, the most applicable to your country/organisation?

Question 4 was excluded from the analysis report due to a technical error in the survey application that failed to present participants with the intended response options and data fields, thereby compromising the validity of the collected data.

5. Please provide a brief explanation or comments, for your responses above, if applicable.

6. For the new articles contained in the ITR Version 2012, Dubai, please rate the practicality of use within your country/organisation.

| | Very practical | Practical | Neither Practical nor Impractical | Not Very Practical | Very Impractical | Unsure |
|--|--------------------------|--------------------------|-----------------------------------|--------------------------|--------------------------|--------------------------|
| Security and Robustness of Networks | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Unsolicited Bulk Electronic Communications | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Energy Efficiency or E-Waste | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |
| Accessibility | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> | <input type="checkbox"/> |

Operational Difficulties

7. Does the existence of two versions of the ITRs cause operational difficulties in your country/organisation?

- Yes
- No
- Unsure

8. In your opinion, which version of the ITRs presents more operational difficulties for your country/organisation?

- 1988, Melbourne
- 2012, Dubai

- Both
- Neither
- Unsure

9. Please provide a brief explanation or comments for your responses to Questions 7 and 8 above, if applicable.

Intervention and Advocacy

10. Is any intervention at the ITU level needed to support Caribbean Operators and Administrations regarding the ITRs?

- Yes
- No
- Unsure

11. Please state the types of intervention needed, indicating specific articles as applicable.

Thank you for your valuable participation in shaping the Caribbean’s stance on this critical issue.

If there is any further information you would like to share regarding the ITRs, their impact on your country/organisation, and/or intervention efforts on an international level, please do not hesitate to contact Mr. Nigel Cassimire, Deputy Secretary-General & Head of Regional Policy Development at nigel.cassimire@ctu.int