Policy Name: PROPOSALS FOR TELECOMMUNICATIONS (Submission of Information) Regulations.

The following summarizes the comments and recommendations received from stakeholders on this document and the decisions made by the Telecommunications Authority of Trinidad and Tobago ("the Authority" or "TATT") to be incorporated in the revised document.

	Policy Section	Stakeholder	Comments	Recommendations	TATT's Decision
					The Authority thanks all stakeholders for the contributions to this consultation.
1.	Introduction	CCTL	The views expressed are not exhaustive. Failure to address any issue in this response does not in any way indicate acceptance, agreement or relinquishing any of CCTL's rights. We wish to place our response within the context of sector developments, current market trends and regulatory developments. In the Tenth Anniversary Edition of Telecommunications Regulation Handbook published by The World Bank, InfoDev, and The International Telecommunication Union, Brahima Sanou Director, Telecommunication Development Bureau International Telecommunication Union (ITU), in addressing the issue of regulating an industry that continues to evolve, writes, *"Regulators face an understandably daunting challenge in trying to keep up with such a rapid pace of technological change. In many cases, regulators are seeking to*	Given the significant regulatory gap between market realities and existing regulatory framework) TATT should focus on updating the regulatory framework. In our view the regulations are unnecessary and onerous on licensed network and service providers. They do not advance the development on the sector at this stage of the evolution of the market. TATT should therefore, consider not proceeding with these regulations	The Authority is currently working on an aggressive legislative agenda which will see amendments to the Telecommunications Act and associated Regulations. Legislative and regulatory changes cannot be done in a vacuum. Technological advancements and their impact on the sector must be analysed. It is also critical to know the state of the market for future developmental work, as well Submission of information is a basic and critical tool available to regulators in the work to advance the sector by way of allowing access to such information and data necessary for future planning - observing and analyzing market trends, informing policy creation, making informed regulatory decisions. Information submission

			cope with the challenges of convergence and the new online world with old-world tools" By and large the existing regulatory framework has been in place since the onset of liberalization in 2001. Over the fifteen year period market developments such as: a) technology, market and service convergence, and; b) the emergence of services and service providers that could not have been predicted when the regime was put in place; render the framework ineffective in addressing the new market realities. New regulatory approaches are required to deliver on policy objectives. Within the current legislative framework regulations are considered subsidiary legislation. They are intended to provide more detailed rules including technical and or procedural details necessary to give effect to umbrella legislation, in this case the Telecommunications Act. Regulation is not an end in itself, but a means to an end i.e. to promote market efficiency and other societal goals. In introducing these proposed regulations TATT states that it *"has recognized the need for the issuance of*		is also required in the monitoring and compliance of authorised providers.

			Regulations which will require the submission of certain specific and prescribed information by authorized providers and licensee to the Authority to be accurate, reliable and timely." It is our considered view that the document - Proposal for a Telecommunications (Submission of Information) Regulations 2016, shows that it does not expand or provide further technical or procedural rules to support implementation of the umbrella legislation, it merely restates much of the information requirements set out in the Act, and includes timelines for submission of this information. Regulations 3 to 5 establishes timelines for submitting different data sets. Regulations 8 to 10 seeks to establish onerous requirements with respect to verifications, certifications and declarations related to the submissions. Regulations 14 to 16 rephrases confidentiality provisions that are already set out in the Act and concession. Regulation 17 recounts Section 71 of the Telecommunications Act. On the issue of confidentiality various sections of the Act [Sections 80 (1) and (2); Access to Facilities Regulations Second Schedule;] and the concession		

			document [Sections A29 to A31] address the issue. In light of the foregoing, it is strongly arguable that the document does not provide additional technical or procedural rules to give effect to the law. Instead it largely seeks to impose onerous and unreasonable regulatory burden on authorized operators.		
	General	TSTT	TSTT, is pleased to respond to the Authority's consultation Draft Telecommunications (Submission of Information) Regulations, 2016. TSTT expressly states that failure to address any particular issue does not necessarily signify its agreement in whole or in part with the Authority's position. TSTT reserves the right to comment on these matters at a later date.		The Authority acknowledges the comment. Please note that the consultation period is applied to stakeholders evenly and the period of comment on the draft Regulations is now completed.

	General	TTBA	While in principle the TTPBA understands the import of Regulations such as these, we are surprised by the way in which this consultation was engaged. Indeed, the Schedules for these Regulations include a significant amount of information to be submitted by TTPBA's membership, but the details and definitions of these submissions are not included in the Regulations. This is akin to blindly accepting dictates of the whims of TATT. This does not suggest an environment of collaboration. This is of concern to the TTPBA as there seems to be significant attempts by GoRTT to establish frameworks which may have the unintended consequence of fettering or interfering with the operation of a free media. Given advocacy of MATT and TTPBA to have the Data Protection Act and the Cybercrime Bills amended to protect the media, these open provisions seem to us an opportunity to, through the back door, still oblige media houses to oversight which could compromise the operation of investigative journalists, compromise their sources, and unduly fetter the media. TTPBA would have preferred (i) a more robust conversation on the definition of the information that TATT seeks to collect, and (ii) the full disclosure of the data collection tools TATT intends to use in	TTPBA would have preferred that TATT undertake a more collaborative approach to the preparation and finalization of these Regulations. TTPBA does not wish to encourage the establishment of regulations that is so open-ended and undefined that it would allow the Government to, through TATT, impose obligations that would unduly fetter the operation of a free press. In that regard, TTPBA cannot support Regulations of this type without the explicit limitation on the type of information that is to be collected by TATT. TATT should re-engage the media in a robust conversation to articulate clearly the bounds of the kinds of information ought – to ensure that there is appropriate limitations of the scope of the information to which these Regulations apply. TATT should also provide in the Schedules to these Regulations detailed information collection tools, so as to properly fix in law	. The Authority appreciates the comments and notes that the public consultation ensures receipt of as many different views as possible. The draft Regulations relate to obligations of authorised providers under existing concession conditions and legislative provisions. On a detailed review, it can be seen that the requirements are tied to specific areas of compliance and provide the authorized provider with clear timelines for data submission. The Authority reminds stakeholders of section 22(3) (c) of the Act and concession condition A28 which require the provision of information to the Authority.

			these Regulations. In the first instance, such a conversation would ensure that there would be understanding of the intent and purpose of the information sought. This would ensure that there is no way that the information covered by these Regulations do not impinge on the free operation of the press. Conversely, with respect to the mathematical formulae suggested in the Scheduled, such collaboration would facilitate the appreciation of the relevance of the metrics sought from broadcasters. Otherwise, we fear that much of the information requested may not be relevant from the Free-to-Air Broadcaster, and result in onerous reporting requirements for broadcasters for very little benefit. In the second instance, we do not understand the piecemeal approach to regulation where the tools are referenced, but not explicitly outlined. This seems unusual in the law making practice of this country – Regulations usually include the forms to be used within the Schedule of the Regulations. This is not done here, and there is no rationale provided why.	the questions that can – and cannot – be asked of the broadcaster, and more importantly, their media/ newsroom operations. Notwithstanding TTPBA's concern over intrusions to freedom of the press and the media, we also have concerns that some of the provisions of these regulations may seem onerous and not relevant to free-to-air broadcasters.	
2	1.1 Relevant Legislation	CCTL	To support the need for these regulations TATT makes blanket references to the Act, Section 18(1) that speaks to the functions and power of the Authority. , Section 22(3)(c) sets out conditions of a	TATT's decision to issue regulations to require providers to comply with information requirements is not supported by the legal framework. The	The Authority refers to section 18(1)(r) of the Telecommunication Act Ch. 47:31 empowers the Authority to "do anything incidental or conducive to the performance

			concessionaire with respect to providing information and reports to the Authority, as well as Section A28 of the concession document which states, *"The concessionaire shall furnish to the Authority, in such manner and at such times as the Authority may* ***reasonably*** *direct, either in writing or by a general notice published by the Authority, such information related to the activities of the concessionaire under this Concession, including but not limited to network or service development plans, financial, technical and statistical information, accounts, service performance metrics and other records, as the Authority may* ***reasonably require*** *in order to perform its functions." (emphasis added)* From the above it is clear that the intentions of the Act, (as amplified in the Concession document), concessionaires are required to provide information *"in such manner and at such times as the Authority may reasonably direct, either in writing or by a general notice published by the Authority, ... as the Authority may reasonably require in order to perform its functions."* The above clearly establishes that requests for information should be reasonable, requests should be made in writing, or through a general public notice issues by	proposed regulations are unnecessary and onerous on licensed network and service providers. They do not advance the development on the sector at this stage of the evolution of the market. TATT should therefore, consider not proceeding with these regulations.	of its functions,"; this would include soliciting/ collecting information from concessionaires in order to facilitate its mandate, section 22(3) (c) and also Concession A28. Submission of information is critical to any regulatory framework to allow analysis of market trends, regulatory intervention where market failure may occur and for monitoring and compliance of obligations.

			TATT. The umbrella legislation therefore sets out a clear process and TATT's approach through these proposed regulations is in our views *ultra vires*.		
	1.1 Relevant Legislation	TSTT	We note that TATT highlights section 22(3) © of the Act and Section A28 of the Concession. We would like to point out however that these aspects of the regulatory framework is contextualized by the general powers of the Authority as outlined in S.18 of the Act. Accordingly, in accordance with best practice, common law, and the provisions of the Data Protection Act, TATT cannot lawfully request information that is not directly associated with its functions outlined in S.18.	TATT should amend this section to clarify that the information collected can only be associated with the carrying out of TATT's function as outlined in the Act generally, and in S.18 of the Act specifically.	This section is intended to cite the relevant sections which govern the submission of information which will be supported by these Regulations. The Authority assures stakeholders that the information collected will be used solely for the execution of the Authority's functions under Section 18(1) (a)-(r).
3	2. Rationale	TSTT	Despite the claim that the framework seeks to: reduce the reporting burden of authorized providers and licenses, TSTT notes that TATT Has not resolved issues of inconsistency in data collections forms which we articulated when TATT consulted on those forms earlier in the year. TATT would recall that TSTT pointed out that for similar data sets, TATT proposed vastly different metrics and collection methodologies and modalities between the data collection form and the requirements of T A TT proposals for Consumer Quality of Service Regulations. From our review of	TATT needs to present to the market an assessment to ensure that the Market Data Forms which this Regulations seeks to regularize in law is in compliance with other Regulations proposed by TATT of in force. In particular rationalisation with the Consumer Quality of Service Regulations, and the Interconnection Regulations is essential.	The Authority notes the comment and informs that an assessment on the Market Data forms will be conducted.

			these proposed Regulations, this inconsistency has not been resolved, so the instant concern, of TATT willingly or not increasing the burden on concessionaires and licenses due to inconsistencies between its own regulations and frameworks is exacerbated.		
	2. Rationale	MPU	The emphasis placed on the role this information will play in the development of the overall market makes one think that a concessionaire needs to have the ability to provide this information as a prerequisite to their eligibility for a concession? Having a concession is untenable if the information submission cannot be successfully done or made. The requirement should form part of the application process to ensure an early commitment on the part of prospective concessionaires to the role of providing business and market information.	Include the prospective concessionaire information system capability as a criteria place concession approval in the first place by having applicants attest to themselves having the capability and capacity for meeting the reporting requirements as bonafide concessionaires.	The comment is duly noted. By signing its concession, the concessionaire agrees to abide by the conditions of the concession and also by the obligations of the Telecommunications Act and any regulations made thereunder. As such, it may be duplicitous and therefore unnecessary to have concessionaires make any additional declaration to this effect.
4	2.1 Overview of the Proposed Regulations	DIGICEL	At the end of Section 2.1, the Authority states as follows: *"The suggested Regulations attached at Section 3 are illustrative only of the policy positions outlined above and should not be construed as actual drafting amendments. Legislation shall be prepared by the legislative drafting department."* However, confusingly the Authority states	It is submitted that by such a gross contradiction on what is the true nature and purpose of this consultation, the process has now been fatally flawed. It is unclear whether participants are commenting on the actual text of the proposed legislation or *"illustrative"* language. The ambiguity created by the	The comment is duly noted. The document issued for consultation is titled "**Proposals** for a draft Telecommunications (Submission of Information) Regulations". It can only represent a policy position until an official draft is composed by the Chief Parliamentary Counsel. As such, the reference to "illustrative" language is intended

			at Section 1.3 that following consultation, the Proposals will be submitted to the Minister for approval and promulgation by negative resolution of Parliament. These two statements are obviously contradictory and ought to be clarified.	Authority has the effect of depriving affected parties a fair opportunity to be heard on this matter. This consultation should therefore be aborted and restarted when the true nature and purpose of the consultation has been clarified.	to be indicative of this process, to which stakeholders are now aware having consulted on numerous proposals for Regulations in the past. The substantive policy positions of these proposals shall remain intact and therefore, in no way, impairs the legal soundness or validity of the consultation process.
	2.1 Overview of the Proposed Regulations Regulation 6 – Unscheduled requests for information.	TTPBA	This Regulation drives to the heart of the concern TTPBA raised above with respect to these Regulations. This Regulations seeks to give TATT a carte blanche to ask for any information, merely by notification. There is no limit in the wording of these Regulations that would constrain TATT from asking for information that could compromise journalistic integrity, sources, and independent operations. In fact, that this Regulation proposes to ignore even the general descriptions outlined in the Schedules underscores that this clause is disproportionate when considering the rights of the free press enshrined in the Constitution.	This Regulation should be deleted. Alternatively, there needs to be a new sub-regulation which defines the types of information that can be requested in this unscheduled manner – and the types of information that cannot be requested	The Authority does not accept this recommendation to delete this section. Proposed regulation 6(1) specifies that unscheduled requests will be pertinent to the conduct of an investigation or pursuant to the fulfilment of obligations and functions under the Act. This will necessarily include both scheduled and unscheduled requests for information. Please note that the proposed regulation also specifies a minimum time period for response, not a maximum, and therefore consultation and clarification on information required by the Authority can occur on a case by

					case basis.
	2.1 Overview of the Proposed Regulations Regulation 6 – Unscheduled requests for information	TSTT	TSTT refers to its comment above of relevant legislation. In this regulation TATT seeks the absolute discretion to make ad hoc requests for information, based on the commencement of an investigation. On review of S.18(1)(m), TATT may investigate complaints on the following: [concerns] *"arising out of the operation of a public telecommunications network"* Or in respect of a *"telecommunications service or broadcasting service"* *" ...rates, billings and services provided generally ...* " This should limit the scope of [TATT]'s powers to make unscheduled information requests. In that regard, proper legislative drafting would suggest that a) Subsection 1 should reference these scenarios when such an unscheduled request is warranted and lawful; and b) Subsection 2 should require that any request under sub-regulation 1 should	Subsection 1 should appropriately reference S. 18(1) (m) as the basis for any request for unscheduled information. Subsection 2 should require TATT to also state some minimum specifics to be included in an unscheduled information request to validate that the threshold for the unscheduled data request has been met, and without which such inclusion, the concessionaire and or licensee should not be obligated to respond to unlawful, ad hoc requests for information.	The Authority notes the comments and clarifies that the word "investigation" in this instance, is not limited to information requests/ conducting investigations arising solely out of complaints. The Authority may request any such information it deems necessary in fulfillment of obligations and functions in accordance with Section 18(1) (a)-(r). This would *include* subsection (m) - investigations arising out of complaints. It is the practice of the Authority to cite the section of the Act, Regulation and/ or Concession condition that relates to the matter being addressed or for which information is requested and such practice shall be maintained.

			explicitly identify which of the categories upon which the unscheduled request is made, and further, should outline some minimum specifics that should be shared with the concessionaire or licensee from whom information is sought.		
5	2.1 Overview of the Proposed Regulations Regulation 7 – Manner of Submission	TTPBA	Information to be submitted to the Authority pursuant to these Regulations shall be submitted in writing addressed to the Chief Executive Officer and **in the manner required by the Authority.** We refer to the highlighted section of the Regulation. TTPBA believes that the manner required should be included as a Schedule in the Regulations. In this way, our earlier requirement of full transparency will be better fulfilled.	TATT must include detailed data collection forms/ tools as Schedules in these Regulations. TATT must also define throughout these Regulations, what types of information are outside the remit of TATT.	The comment is duly noted. The formulation of data collection forms is being actively considered by the Authority as well as the consideration of a form of online data collection to simplify the process for submission of information Given the dynamism of the industry and the sector, there is no way to predict what type(s) of information may or may not be conducive to the Authority's functions.
6	2.1 Overview of the Proposed Regulations Regulation 8 – Certification of Information	TSTT	TSTT notes that in subsection 2 and in the Third Schedule, TATT establishes a form through which a statement of certification is to be submitted. This is to be complimented. However, this raises the question as to why in other consultations -such as the Universal Service Regulations -TATT has stridently resisted TSTT's recommendation		The comment is duly noted. Regulation 7, 8 and Third Schedule require a form of certification. Regulation 9 requires a statutory declaration only where there is doubt as to the veracity of the information. The regulation 9 declaration is expected to be made pursuant to the Statutory Declarations Act Chap.7:04 which

			to formalise in the Regulations the forms that TATT would like concessionaires to submit information. TSTT takes this opportunity to remind TATT that their website does not share the legal import of the Gazette, and that the law and judicial practice in Trinidad and Tobago is for matters of such statutory function to be published in the Gazette before it is given judicial notice.		applies to voluntary declarations and also those required by law. Where publication by the Gazette is required, that will be done in accordance with the relevant law.
7	2.1 Overview of the Proposed Regulations Regulation 10 – Verification of Information Submi	TTPBA	TTPBA's membership queries whether the timelines outlined in these Regulations are realistic. While the timeframes for a statutory declaration in Regulation 9(2) was close (at two weeks – it should be extended to three weeks), the timeframes in Regulation 10 cannot be realistically achieved. TATT should give 7 days notice, and then thereafter give operators 14 days (for a total of 21 days) to allow media houses to get there records in an organized manner for validation by TATT	TATT should change the timeframes outlined in Regulation 9 are totally unachievable and unrealistic.	The Authority believes that fourteen (14) days is sufficient time for the provision a statutory declaration attesting to the truth of the information submitted. Please note that an extension of the timeframe may be granted upon written request for same, if and when necessary.
8	2.1 Overview of the Proposed Regulations Regulation 12 – Use of Information by the Authority And	TTPBA	TTPBA has the concern that in the context that TATT has left the type of information that can be requested open, to include information that may affect the freedom of the press, that TATT also seeks the absolute discretion to change the terms of use of the information garnered. Where is due process? Where is the	Regulation 12 must be amended to provide for consent/ agreement from the media house for information collected to be used for purposes other than that stated in these Regulations. Regulation 13 should be deleted.	The Authority has, by virtue of Regulation 13, given the concessionaire the opportunity to object to the use of its information for any purpose other than that which is set out in the Schedules. The Authority does not agree that Regulation 13 be deleted since it

	Regulation 13 – Objection to use of information		protection of the Courts? Is TATT seeking to make itself some ultimate judge, answerable to no one? TTPBA believes that, as provided in the Data Protection Act, information collected should only be used for the means for which it was directly collected – as defined in written law. As such TATT should not be able to change the terms of use of the information collected, without either 1) consent from the media house from whom the information was collected; or 2) amendment to the law, at which time, only information collected after the amendment may be used for the new purposes outlined.	In any case, even if it were to remain, it must be amended to remove TATT's discretion as currently provided. Instead, it should be up to the Courts to determine whether the objection raised is legitimate.	is a critical exercise of the right to information or to withhold information The Authority acknowledges the concern regarding use of discretion where an objection to the use of its information is raised. Consideration will be had to specifying the applicable parameters to the information as including section 80(2) of the Act. However, specific parameters may be difficult to establish since by and large the application for exemption by the provider may need to be analysed by the Authority on a case by case basis.
	2.1 Overview of the Proposed Regulations Regulation 12 – Use of Information by the Authority	TSTT	Regulation 12 (2) is in direct contradiction of the provisions of the Data Protection Act. Whereas the Data Protection Act requires that the data processor receives CONSENT from the data subject before disclosing or otherwise using information collected for another given purpose, in this sub regulation the Authority does not seek CONSENT. Instead, the Authority seeks to	Regulations 12(2) is unlawful and should either be: (i) Struck from these regulations or (ii) Amended so that the Authority will seek consent from the data subject before proceeding to use the information.	The Authority has, by virtue of Regulation 13, given the concessionaire the opportunity to object to the use of its information for any purpose other than that which is set out in the Schedules. Though 'consent' up front is not sought from the concessionaire, there is sufficient time granted to

			merely notify the data subject unilaterally, and thereafter use the information for purposes other than that collected WITHOUT THE CONSENT of the concessionaire or licensee. As a subsidiary piece of legislation cannot overrule a substantive law, TSTT is of the opinion that this provision is unlawful and should be struck from these proposed Regulations.		the concessionaire, after notification, to state its objection to such usage prior to such usage.
9	2.1 Overview of the Proposed Regulations Regulation 16 – Without Prejudice	TSTT	This provision underscores that TATT has not done the due diligence necessary to ensure that information collection mechanisms collected do not contradict other pieces of regulation, licence of concession requirement. This clause will effectively require some operators to be bound both by these Regulations as well as ad hoc and other information requests which TATT may have instituted over time. While this does not augur well for any claim of rationalising the reporting burden of concessionaires, it also does not bode well for the claim that the framework is fair and balanced for all similarly situated persons. This potential for imbalance should be removed from these Regulations. The only way to ensure there is no balance is for T ATT to do its work competently so as to ensure that such imbalance does not exist. .. and if that was	TATT should undertake the due diligence necessary so that this clause can be deleted.	The comment is duly noted. Consideration will be had to amend proposed regulation 16 to include an exception at the end: "(2) *Notwithstanding (1), where the requirement to submit such information has been fully met by the person in a previous submission made pursuant to the Act, authorisation, licence or other Regulation, the person may authorise the Authority to use same for the purposes of these Regulations".*

			done, there would be no need for this provision. TATT should undertake the due diligence necessary so that this clause can be deleted.		
10	3.2 Interpretation	DIGICEL	The Authority is purporting to manufacture a definition of the term *"tariff"* in subsidiary legislation where it does not exist in any form of primary information. This is unlawful as the regulations cannot exceed the parameters of the Telecommunications Act.	The definition of "tariff" should be deleted.	These Regulations were envisioned to take effect subsequent to the passing of the amendments to the Telecommunications Act Chap. 47:31. As such, certain definitions and terminology have been drafted to be consistent with the Act, as amended.
11	3.6 Submission of information by licensees	DIGICEL	The Authority does not have an unfettered right to request information from providers, based on a whim. The Telecommunications Act makes it clear that information can only be requested by the Authority in fulfillment of its functions and obligations, and that requests must be reasonable. Providers are entitled to evidence that these conditions have been met before they comply with any unscheduled requests for information.	This regulation should be amended to provide that the Authority is required to prove to the satisfaction of the provider in question that information is being requested in fulfillment of its functions and obligations, and that request is reasonable. Providers should not be obliged to comply unless these conditions are met.	The Authority acknowledges the concern and related recommendation. In accordance with section 18(5) of the Act, the Authority shall, at all times "in the performance of its functions and exercise of its powers, act in an objective, transparent and non-discriminatory manner." Whereas the Authority cannot be fettered as a public body and held to a standard dictated by a concessionaire/ stakeholder, it is committed to being as fair and

					reasonable in the performance of its functions and to disclose the purpose of its requests in every instance where it is possible to do so.
	3.6 Submission of information by licensees	DIGICEL	The time frame of 14 days is unreasonable and should be deleted.	This regulation should be amended to give providers 30 days or any other such time frame as is reasonable in the circumstances. Further, provision should be made for providers to be able to request an extension of time for the submission of responses to unscheduled requests for information.	The Authority does not agree that this timeframe is unreasonable. Please note that the Regulation stipulates a timeframe of no less than 14 days, 14 days being the minimum. However, the Authority acknowledges that there may be instances where, depending on the nature of the information requested, such a timeframe may need to be extended. As such, and upon a request for same, the Authority shall consider all requests for reasonable extensions.
12	3.9 Requirement to make Statutory Declaration	DIGICEL	The requirement for a Statutory Declaration is unreasonable and unnecessary.	This regulation should be deleted in its entirety as it unreasonable and unnecessary. Alternatively, the Authority should be made to justify in detail in writing to the satisfaction of the provider why the validity or accuracy of a submission is being doubted. Only when this is done	The Authority does not agree with the recommendation to delete Regulation 9 It is the responsibility of all concessionaires equally, to provide accurate, valid data at all times and to satisfy the Authority of same.

				should any statutory declaration be prepared by the provider.	
13	3.10 Verification of information submitted	DIGICEL	The time frame of 7 days for the submission of original records is unreasonable.	The regulation should be amended to provide for 21 days for the submission of original records. Further, provision should be made for providers to be able to request an extension of time for the submission original records.	The Authority believes that fourteen (14) days is reasonable in all circumstances. The Authority acknowledges that there may be instances where such a timeframe may need to be extended. As such, and upon a request for same, the Authority shall consider all requests for reasonable extensions.
14	3.12 Use of Information by the Authority 3.13 Objection to use of Information	DIGICEL	Regulations 12(2) and 13 are unlawful. The Authority cannot collect information for one specific purpose and then utilize same for another. The purpose of each request for information must be communicated in advance to the provider and justified based on the provisions of the Telecommunications Act.	Regulations 12(2) and 13 must be deleted	The Authority has, by virtue of Regulation 13, given the concessionaire the opportunity to object to the use of its information for any purpose other than that which is set out in the Schedules. Though 'consent' up front is not sought from the concessionaire, there is sufficient time granted to the concessionaire, after notification, to state its objection to such usage prior to such usage.
15	3.14 Confidentiality of Information	DIGICEL	Subsection ii is unlawful as it expands the parameters for disclosure of information set by the Telecommunications Act	Regulation 14 Subsection ii should be deleted	The Authority does not agree to the recommended deletion. Disclosure for enforcement purposes would be only to investigating officers appointed under section 51 of the Act, or to

					counsel in a matter for prosecution.
16	3.15 Procedure for disclosure of confidential information	DIGICEL	The time frame of 14 days for the Authority to give notice of disclosure of confidential information.	The regulation should be amended to provide for 30 days for the Authority to give notice of disclosure of confidential information. Further the procedure for the consideration of representations along with the attendant time frames should be provided for in this regulation.	
17	First Schedule	DIGICEL	The information provided under the heading "Purpose" in both Schedules falls far short of the requirements of the Telecommunications Act in terms of justifying why the information set out in the schedules is needed. It is grossly inadequate to simply use terms such as *"Policy formulation"* or *"Competition assessment"* in order to satisfy a provider that the Authority's request is in accordance with the Telecommunications Act.	The Authority needs to provide more detailed information regarding the purpose for which information is being requested.	The Act does not require that the Authority justify why the information set out in the schedules is needed. The terms/ headings used in the Schedules are directly representative of the functions of the Authority as stated under Section 18(1)
	First Schedule	TSTT	TSTT's comments to the Market Data Forms consultation process remains relevant, as there has been no closure to that consultation process.		The comment is duly noted. The Authority will ensure status communication to providers on the related process of market Data forms.

	First Schedule	CCTL	The information contained in this Schedule mirrors the Marketing Data Report that is submitted on a quarterly basis. While CCTL has no issue with the substance of the Schedule as we already comply with these requirements, we question the need to proceed with regulations when the existing requirements are effective standard reporting requirement having been issued pursuant to the umbrella legislation. Further, currently the timeline allowed for submitting the Marketing Reports is six weeks after the end of the period to which the report relates. This reporting cycle has been in place for several years and is based on the experience of service providers with respect to a reasonable timeline for submitting these reports. For TATT to reduce the allowed period form six weeks to two weeks coincident with enshrining these requirements concomitant with significant penalty to be imposed [Act, Section 71], "summary conviction to a fine of twenty five thousand dollars, and in the case of a continuing offence to a further fine of one thousand dollars each day that the offence continues after conviction" speaks to a level of unreasonableness that could be construed as an abuse of authority. Outside of any provisions in the Act or set		The Regulations serve to formalize and streamline the data collection process and to ensure the timeliness, confidentiality and accuracy of data collected. The Authority has not reduced the timeframe for submission of Marketing Reports from 6 weeks to 2 weeks. The information to be provided in the First Schedule "shall be provided within twenty-eight (28) days of the end of the period to which it relates."

			out in the concession, TATT's attempt to define in regulations the various purposes for which specified information is collected as well as the confidentiality profile of that information is questionable at best. This layers on unnecessary, costly and inflexible ex ante regulatory provisions. Further, this negates protections provided to concessionaires in the Act and other regulations. For example, the Telecommunications Access to Facilities Regulations 2006, Section (8) (6) provides that *" All information provided under this regulation shall* *be used for the purpose of facilitating access only, and shall not be disclosed to any third party without the prior written permission of the concessionaire who provided the information."* However in addressing the same item in these draft regulations [First Schedule Section B – Annual Submission, item 1/B/9] provides that information submitted in line with facilitating access, based on the Access to Facilities Regulations 2006, can also be used in other processes such as competition assessment.		This comment is duly noted Consideration will be had to amend proposed regulation 16 to include an exception at the end: "(2) *Notwithstanding (1), where the requirement to submit such information has been fully met by the person in a previous submission made pursuant to the Act, authorisation, licence or other Regulation, the person may authorise the Authority to use same for the purposes of these Regulations".*
	First Schedule	Parliament	The Draft Regulations contemplate the submission of quarterly revenue statements in the First Schedule-Part A. The reasons for this requirement are for market research, policy formulation,	The Office of the Parliament via Parliament Channel 11 and FM Radio Station 105.5 has a specific mandate to broadcast each sitting of the House from	At this time, it is the considered view of the Authority that all concessionaires (broadcasters) are to be treated equally and without discrimination.

			resource management, competition assessment, market analysis and regulation.	gavel to gavel and to provide an opportunity to citizens to be well informed about the issues affecting their governance. It is towards this end that the generation of revenue does not feature in the operations of the Parliament Channel 11 and FM 105.5. In light of this, we view the requirements under First Schedule Section A to be onerous. While acknowledgment is given of the purpose of the data requested, it is clear that the Parliament Channel 11 and FM 105.5 is not and is not intended to ever be a revenue generating broadcaster Consideration should be given to the provision of the information on a yearly basis instead of quarterly as is now required. Alternatively, consideration should be given to creating different reporting timelines for non-revenue generating concessionaires/licensees. It is submitted that an amendment of the Telecommunications Act, Chap. 47:31 can be explored, using the model from the South	However, the Authority shall take this suggestion into consideration, going forward.

				African Broadcasting Act (Act 4 of 1999) whereby, the parent Act categorises the broadcasting licences. Notable is the category of *"any other class of licence as determined from time to time".* This may be a consideration to cover licences granted to entities such as the Parliament Channel. We do acknowledge the advantage of placing the categories of licences in the subsidiary legislation.	
18	1/A/1	DIRECTV	In the interest of transparency, and fair competition in gauging the industry as a whole, information should be made available on each provider. Data on the number of subscriptions is not, in our view confidential information. In Brasil, Colombia, Chile, Ecuador, Peru, Uruguay and Venezuela, local regulators publish quarterly reports with per-provider information regarding number of subscribers and technology used. Argentina is the exception in Latin America, however, this may soon be changed by the recently created regulator. In the international landscape, the U.S., U.K. and all European Union telecom regulators also publish market information periodically.	Individual numbers as opposed to aggregate totals on number of Subscriptions should be published.	A29 states that Subject to Condition A30 (which sets out the circumstances under which information may be disclosed)," *the Authority shall keep confidential any information furnished to it by a concessionaire, which the concessionaire has specifically expressed to be confidential at the time of submission to the Authority, and which is of a confidential nature…"* The Authority shall consider the suggestion in keeping with its obligations under the concession.

19	1/A/2	MPU	Volume of traffic under digital transmission is usually measured in bytes while conversion of digital bytes to switched minutes will reflect two irreconcilable volume/capacity measures. That is unless a system conversion rate of total bytes per switched minute is contrived and this may have to be an average measure. e.g. FCC reference 300 minutes of voice conversation converted to bytes will cost .00000007 cents US		The unit of measurement for the volume of traffic for each service provided will be stipulated in the prescribed forms/ templates for the submission of information.
		MPU	Traffic volumes to international destinations /jurisdictions are not requested. ITU requirements call for outgoing and incoming international traffic to be stated for each international jurisdiction. This is a standard for global statistical information. Care should be taken to ensure ITU required information is incorporated or integral with TATT's request from local operators.	Cover ITU and other standard or international traffic information requirements in all requests from local operators, to avoid duplicating requests from operators.	1/A/9 speaks to submissions of volume of traffic to and from Public International Telecommunications Networks and Services.
20	1/A/11 and 1/A/12	TTPBA	The recommendation here goes beyond what is currently shared with TATT. TTPBA's membership objects to the submission of the amount of minutes sold a month. This goes beyond TATT's statutory powers. Indeed, without clarification of what function outlined in S.18 of the Act requires this information, such a request I ultra vires the Act.	TATT should remove the requirement to submit minutes sold from 1/A/11 and 1/A/12	The Authority does not agree to the deletion of 1/A/11 and 1/A/12 Advertising minutes sold, directly impacts the amount of revenue collected by the broadcaster for the month. Sector revenue is assessed to determine its contribution to the country's GDP which in turn will reflect any development in the sector. Section 18(1) (r) empowers the

					Authority to "*carry out such other functions imposed by or under this Act and do anything incidental or conducive to the performance of any of its functions.*"
	1/A/11	MPU	In the realm of broadcasting there are emerging services from broadcasting stations and cable stations that do their own content production. There are also many emerging sources of revenues	Allowance should be made for concessionaries to name and create their own sources of revenue which they may have crafted themselves and given unorthodox names. The evolution of the markets and its subordinate technologies shifts the onus to concessionaires to create and contrive their own services and subsequently report them to TATT. In some cases similar services may have different names .TATT should amend this regulation to accommodate such f1exibilities once provision is made for definitions and references to services so they can be properly classified.	The Authority notes the comment. Further discussion on the intent of the comment may be required.
21	1/A/15	TTPBA	This proposal seems extremely onerous and an ill fit for free-to-air broadcasters. We recommend that FTA broadcasters be exempt from this requirement.	TATT should remove the requirement to submit minutes sold from 1/A/11 and 1/A/12	The Authority does not agree that this requirement is an onerous one. Further, advertising minutes sold, directly impacts the amount of revenue collected by the broadcaster for the month. Sector revenue is assessed to determine its contribution to the country's

					GDP which in turn will reflect any development in the sector.
	1/A/15	DIRECTV	DIRECTV views the obligation to report details of every complaint as onerous. In addition, the term *'complaint'* is ambiguous and some clarity is needed. For example, are all technical issues to be reported?	To continue with the present system of reporting the quantity of complaints.	Once a complaint is made and logged by a provider, it should be captured in the report to be submitted to the Authority. The Authority does not agree that the requirements of 1/A/15 are onerous as not all complaints will require the same level of detail and depends upon the complexity of the matter. If the complaint is of a technical nature, then it too should be included.
	1/A/15	MPU	There are other issues of consumer protection and welfare that must also be addressed from a compliance reporting standpoint. For example adherence to information society laws and how they are made operational by operators and service providers. e.g. Data protection measures to be applied from the Act, customer privacy, network neutrality relative to access and availability of over-the-top services or, blocking of services in Trinidad and Tobago, intellectual property violations.		The Authority acknowledges the viewpoint on consumer protection.
22	1/B/7	DIRECTV	DIRECTV views this requirement as	This requirement should limited to	The concession defines control

			excessive considering the structure of the AT&T Group of companies internationally. Would we be required to provide every year a *"diagram showing all members of the group"* and the relationship between the companies?	companies that directly own shares or directly control the provider.	as *the ability of one entity to direct the affairs of another whether by virtue of the ownership of shares, by contract or otherwise*. It is accepted that control can be exerted on a company not only by direct owners but also by indirect owners. In addition, it is important to see the group members so that the ownership profile can be seen at a glance, and also to aid the Authority in whether a change of control has occurred in the group.
23	1/B/9	TSTT	The Reference Access Offer (RAO) is not a requirement of the Access to Facilities Regulations. The Regulations have not been amended to require the creation of such a document. As such this requirement should be deleted.	Remove this information requirement until such is lawfully required under the Access to Facilities Regulations	It is wholly anticipated that the amendments to the Access to Facilities Regulations (and its attendant inclusion of the Reference Access Offer (RAO)) shall be passed prior or concurrently with the passing of the Submission of Information Regulations. As such, the Authority does not accept the suggestion for the removal of the RAO requirement from the Schedule attached to these Regulations.
24	1/B/12	DIRECTV	Confidentiality provisions in our programming agreements prohibit disclosure in most instances.	We will provide certification letters as far as possible.	The Authority is poised to accept both License Agreements and Certification letters in fulfillment of this reporting obligation. Where only a License Agreement is

					available, a concessionaire may redact any and all such information which it deems fit.
25	1/B/14	TSTT	TSTT numerous comments on the failings of the Cost Model definition refers. T A TT has not completed the process through which the CCA Data Templates and LRAIC data templates can be deemed finalised. Indeed, T A TT has failed to address material concerns raised by concessionaires about failures of its Model implementation and its inconsistencies with the Costing Methodology. That both the consultations on the CCA Reference Paper and LRAIC Specification Papers remain incomplete it is inappropriate for TATT to seek to bind operators to a framework that is so woefully compromised. To seek to do so -surreptitiously seeking to require submission of documents for which it has not completed its own procedures of ratification -would suggest TATT's willingness to be nontransparent, disingenuous and untrustworthy in its dealings with the market and operators.	Remove this information requirement until the CCA Reference Paper, LRAIC Specification Paper and LRAIC Model have all been cleared of the numerous procedural and systemic flaws which have plagued that initiative for 5 years.	Data from authorized service providers is needed to fully test the LRAIC Model. The Authority takes note of the comment and will amend the schedules where applicable. In this respect the Authority would amend the CCA and LRAIC references to include a request for, “the submission of relevant costing data for costing models, methodologies or formulae which the Authority may establish.” Such models and methodologies inclusive of LRAIC would be adopted in consultation with the industry. This requirement is in line with the existing Interconnection Regulations and Access to Facilities Regulations. Whilst bringing more regulatory certainty to operators, this inclusion further allows the Data Submission Regulations to transcend time and

					changing technologies and associated methodologies.
	1/B/14	MPU	There should be a periodic update or criteria for a periodic update of the network service costing model. There is the concept of a snapshot approach to service costing where input data used represents a specific cut off period. There is another concept of continuous update where the model represents the network status on an ongoing basis. This method requires updating the network asset model in tandem with the financial general ledger. This is achieved by the creation of a cost ledger comprising network non-current assets depreciated monthly and a chart of business expenditure accounts that completes the company's entire service cost base. This "cost base of accounts" is reconciled with and posted monthly, in agreement with the "GL accounts" of the company's service cost base. The costing model is then able to use the currently posted financial data (streamlined into categories compatible with network costing) thus allowing the model to generate the service costs based on LRAIC principles and categorizations.	Do the LRAIC model service costs refer to a snapshot period of costs? If yes, then this will always yield costing at a historical date and never reflect current levels of an operator's costs. There will always be a significant time lag of the costs operators produce and provide.	The Authority recognizes the contribution and the value of robust and periodic updates of the network service costing model. The Authority will weigh this contribution against the constraints of actual implementation. In this respect, the Authority notes that there is the risk associated with the use of unaudited financial data in regulatory decision making and further, notes the capacity constraints of operators in meeting frequent costing data requests, given set accounting system timeframes.
26	1/B/16	DIRECTV	It is unclear whether 'Investments' mean all investments or only those related to Market Research.	Kindly clarify what constitutes 'Investment' for this purpose.	Investments in this context refers to gross capital formation (CAPEX). The reference to Market research specifies the purpose for

			Column 4 refer to the publication of Market Totals, however, it is unclear what it includes.	"Market Totals" to be clarified.	which the information will be used. "Market Totals" refers to the aggregate information collected for the sector which may be published by TATT.
		TTPBA	Again, this proposal seems overly intrusive and goes beyond TATT's statutory powers. Unless this is referring to investment in network and/ or equipment directly related to the broadcasting service, TATT would need to clarify under S.18 of the Act what function of TATT requires such information.	TATT should, with respect to FTA broadcasters, either: 1) limit 1/B/16 to investment associated with equipment/ plant; or 2) exclude them from this obligation.	Investment in this instance refers to investments in all fixed assets directly related to the broadcasting service.
27	1/B/17	TSTT	TATT has yet to identify under which function outlined in S.18 of the Act, does the number of staff employed by gender is relevant, This is not the first time that TSTT has sought this clarification. Without such clarification, this request for information is counter the provisions of the Data Protection Act and ultra vires the Telecommunications Act.	The requirement to submit information of gender of staff should be struck until there is clarification of how this will assists TATT's administration of the sector.	Trinidad and Tobago, as a member of the ITU, is required to provide information on the number of persons employed in the telecommunications sector by gender. The Data Protection Act defines personal information as "info about an identifiable individual"(i.e. information that identifies the individual or can reasonably be used to identify the individual). The Authority contends that the info requested under 1/B/17 does not constitute personal information.

28	1/B/20	DIRECTV	In the interest of transparency, and fair competition in gauging the industry as a whole, information should be made available on each provider. Data on Homes Passed is not, in our view confidential information.	Individual numbers as opposed to aggregate totals on Homes Passed totals should be published.	A29 states that Subject to Condition A30 (which sets out the circumstances under which information may be disclosed)," *the Authority shall keep confidential any information furnished to it by a concessionaire, which the concessionaire has specifically expressed to be confidential at the time of submission to the Authority, and which is of a confidential nature…"* As such, the Authority shall consider DIRECTV's suggestion in keeping with its obligations under the concession.
	1/B/20	MPU	This should include homes passed by broadband fiber optic cable as well	Coaxial is not the only cable capable of delivering CATV therefore homes passed by it should provide similar information for the purpose of that of the coaxial cable.	The Authority agrees that this should be included and will amend the document to reflect that data will be collected for subscription broadcasting services offered on all wired and wireless mediums.
	1/B/20	MPU	In the templates of Statement of Comprehensive Income, which have as their end result computed return of investment, after deducting income from allocated costs of service, there is no tendency by TATT to drill down to any profitability per service unit calculation. 1) The total turnover divided by total	Why has TATT not decided to venture into the realms of monitoring affordability with regard to market pricing? Accounting separation provides the rudimentary bases for doing costs and profitability per service and providing unit costs. This will	The Authority welcomes the suggestion and will consider looking into feasibility of doing same in the future.

			service output units would give a total contribution per service unit. 2) Total variable costs divided by total output units would provide total variable cost per unit 3) Total fixed costs divided by total output units would give total fixed cost per unit 4) These three metrics would enable computation of breakeven analysis measures to greatly assist in affordability pricing that will advance Government's liberalization policy for lower prices and	assist the Ministry of Public Utilities in the pursuit of its Utilities affordability policy objectives and guiding our Agencies pricing structures	
29	First Schedule, Section C	PARLIAMENT	The Regulations provide that the Authority may entertain such a request where by law or due to its internal procedures, the concessionaire is not required to produce annual audited accounts and the application has to be made in writing.	This should be an option for the Office of the Parliament and similar entities.	The Authority acknowledges this suggestion bearing in mind that the funds appropriated to the Office of the Parliament from the Consolidated Fund are audited by the Auditor General and such audit forms part of the Comprehensive Annual Report of the Auditor General. However, in every instance where audited accounts are required to the submitted, the Office of the Parliament will still be responsible for providing the Authority with documentation explaining its inability to provide same.
	First Schedule, Section C (1/C/3)	TSTT	TSTT reminds TATT that is as yet to clarify our outstanding concerns about the legal definition of terms used in the Accounting Separation Regulations.	TATT needs to fix the anomalies in the Accounting Separation Regulations immediately.	As the telecommunications sector grows and develops into more efficient and competitive markets with new and innovative telecom

			TSTT reminds TATT that without such clarification, the Regulations remain a challenge to implement. Further, TSTT notes that TATT has not made any headway to treat with the question of international transfers outside the domestic sector by parties who own and control upstream firms that interact with their domestic networks but are not registered in Trinidad and Tobago. Such leakage of foreign exchange and possible avoidance of taxable income should be an urgent focus of any Accounting Separation regime.	TATT should seek to revise and review the Accounting Separation Regulations to better treat with international transfers of revenues, via inter-business allocations within multinationals, to firms outside of Trinidad and Tobago.	services, the Authority recognizes the need to revise and update the Accounting Separation (AS) Guidelines to be used for accounting separation. As such, the accounting separation requirements for the sector may be modified in consultation with concessionaires, stakeholders, interested parties and the public, as the Authority deems appropriate.
30	Second Schedule	CCTL	To the extent that there are provisions for the items of data submission listed in this schedule in the Act, other regulations or the concession document, CCTL takes no issue with these from the perspective of providing the information. Tariffs are already published in line with publication requirements. CCTL does not see the need to further provide an annual submission of tariffs. This is further complicated by the fact that invariably prices change during the period of a year rendering this requirement of no value. This would only serve to add cost with no commensurate market benefit, essentially promoting inefficiency. Subscription broadcasting services i.e. list	These regulations are unnecessary and onerous on licensed network and service providers. They do not advance the development on the sector at this stage of the evolution of the market. TATT should therefore, consider not proceeding with these regulations. With respect to accounting separation requirements we recommend that TATT forebear until the regulations are revisited.	While the Authority is focused on modernizing its regulatory framework, it is the Authority's firm view that these Regulations and the information to be collected thereunder would in fact prove to be very useful in advancing the sector by way of allowing the Authority access to such information and data necessary for future planning - observing and analyzing market trends, informing policy creation, making informed regulatory decisions. CCTL is reminded that all Accounting Separation documents were subject to consultation with

			of channels carried and owner of content [item 1B11] is essentially what is provided for [item 1B12] copies of content agreements. Further, it has been established that letters of certification from content provided are more effective in establishing intellectual property rights compliance, than copy agreements. For instance a copy agreement does not establish that the party in in good standing regarding payments. It is unclear why having made this decision, TATT is now going back to request copy agreements for this purpose. With respect to cost modellings data [Item 1B14], TATT has been unsuccessful in justifying the need to collect annually the wide ranging data prescribed in relation to the long run average incremental cost (LRAIC) proceedings. The shortcoming of the current approach is demonstrated by the failure of the process to date. The lack of credible service cost outputs from the process spanning over seven years speaks for itself. Several operators including CCTL have provided reasonable and convincing arguments to support data collection and model updates only in advance of an interconnection rate review proceeding which is generally at five year intervals. This is a more pragmatic and reasonable		all stakeholders, and have been in existence for well over five years. Furthermore, CCTL is reminded that the Authority upholds the country's commitments and obligations under the World Trade Organization's General Agreement on Trade in Services (GATS) and the obligations under the Economic Partnership Agreement (EPA) between CARIFORUM and the European Community. Specifically, Article 97 of the EPA and Section 1 of the GATS Reference Paper on Telecommunications Services (to which Trinidad and Tobago is bound) makes requirements for the Authority to, inter alia, implement measures to prevent anti-competitive cross-subsidisation in the telecommunications sector. One of these measures is the implementation of Accounting Separation

			approach which is consistent with international best practices. We have contended that using sector resources to collect data and submit cost related data annually is unnecessary and does not promote market efficiency. These unnecessary costs are eventually borne by the consumers. We refer TATT to our submissions in the LRAIC and current cots accounting (CCA) processes. These requirements are at best unfair and are arguably an borders on an abuse of power. They appear to be seeking to put in place unnecessary regulations with a view to forcing licensed providers to use expensive resources to fulfill a requirement (i.e. annual LRAIC and CCA) that is no benefit to the market. We use this opportunity to point out that given market developments, requirements related to accounting separation need to be revisited. This is a good example of an old regulatory tool that is not relevant to new market environment. Until the regulations are revisited TATT should forebear with respect to accounting separation requirements		
	Second Schedule	MPU	The duplication of resources has been a factor in the over-leasing of property space and land use that appears to be creating excessive mobile and network facilities	Seize the opportunity to gather information on colocation spaces to foster the later market entry of NGN application and content	The comment is duly noted.

			locations across the country. It is raising questions about the potential public hazards and over-exposure to citizens in relation to radio frequency emissions. This information requested here may now prove valuable in subordinate fashion for the Authority if also used to encourage and foster colocation among operators. This information opportunity should also be, to impose on operators to provide information or report on the colocation spaces available at their various facility Locations across the country. Thereby allowing a colocation market to develop and grow for prospective service providers who will be entering the broadband convergence market as "application providers" or "content providers" and maybe only needing interconnection at near-end points of existing operators' networks.	providers who will likely require interconnection at the fringes of the access network. This refers to reference 2/2 Cellular Radio Communications page 31 of the TATT consultation document.	
	Second Schedule	MPU	Will this requirement apply to MVNOs (mobile virtual network operators) who have spectrum allocation without owning physical network?	Should TATT license MVNOs their physical network should be reported on by the network facilities provider?	At this time, MVNO will not be licensed spectrum by the Authority nor will they own a physical network, therefore data covered in this section will not apply to MVNOs
31	Concluding Comments	CCTL	These proposed regulations on the submission of information are onerous and excessive and given the current market conditions, are unnecessary. CCTL believes that regulations should be balanced with respect to what is relevant, they should be sensitive to efficiency, time	These regulations are unnecessary and onerous on licensed network and service providers. They do not advance the development on the sector at this stage of the evolution of the market.	While the Authority is focused on modernizing its regulatory framework, it is the Authority's view that these Regulations would in fact prove to be very useful in advancing the sector by way of allowing the Authority access to

			and costs involved for both the service provider and the regulator. Regulations should invoke a standard of “reasonableness” and “relevance” as well as sensitivity to efficiency and the imposition of undue administrative burdens.	TATT should therefore, consider not proceeding with these regulations.	information necessary for future planning, observing and analyzing market trends, informing policy creation, making informed regulatory decisions.