



Position Paper

Information and Communication Technology (ICT)

Information and Communication Technology (ICT) POSITION PAPER

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A. Preamble

These positions and policies are based on the common interests of the voice of business ICT in ASEAN economies, in particular three – EuroCham Singapore ICT Committee and JFCCT ICT group with EABC ICT Advocacy Group and EuroCham Vietnam. In addition, in recognition of the host status of the Summit, industry consultation has taken place in Cambodia. The business ICT NGOs are pleased to have the opportunity to present these issues and recommendations.

(a) General and common topics

Our belief is that the telecoms industry works best for the economies which it serves if well structured and well regulated with transparent and published industry and government expectations. The following include relevant points of long-standing common regional interest, based on global norms in the industry and also reflect policies which would best draw out enhanced roles for ICT in the various economies.

(i) Industry structure and general operation of the telecoms industry

The desired telecoms industry is well reflected in legislation in most ASEAN economies. But the reality is often different. We advocate a regime where all operators are on a level playing field with arms'-length licensing terms, a wholesale market with mandated access pricing, fair interconnect and competition regulation.

The protection of incumbent operators and national champions inevitably hurts consumers and the wider economy as choice is restricted, and innovation, investment and, therefore, wider economic growth and productivity are curtailed.

We encourage foreign investment and believe that governments should embrace foreign company participation in their telecommunications markets. This increases investment, diversity and quality of service.

Recommendation ASEAN General 1: Recognition that structure of a telecoms industry is important, it needs fair and equal treatment, ideally all operators under the same kind of licence conditions from a single regulator where foreign investment is encouraged.

(ii) Competitiveness and dual role of the telecoms industry.

We encourage support for the competitiveness of the sector, both within each economy and also regionally. Thus the right structures are important, attractiveness of investment and the infusion of skills are important.

Calls to end competition in the name of regulatory certainty are false. Regulatory certainty is based on predictable regulation, not no regulation.

Equally, calls to end pro-competition service level regulation in the name of investment are also false. Investment comes through a combination of opportunity, predictable regulation, competition and return. If a favoured investor is protected from competition for political reasons, then the investment will be inefficient, misdirected, self serving and immune from customer and market need.

Recommendation ASEAN General 2: Competition regulation needs to be clear, fair and enforced.

(iii) Skills, Education and free movement: ICT skills are in short supply. The nature of the industry is global. Confining source pools to national boundaries makes it harder to find the right skills and limits innovation. Our recommendation is to strive for an innovative and entrepreneurial mindset in graduates and other ICT industry participants. This implies a change to education and also to certification for ICT skills. We do not note it separately here; however intellectual property protection is an essential ingredient in the attractiveness of various IT hub plans.

Recommendation ASEAN General 3: Governments should recognise the benefits of, and support, free movement of a range of skilled people and invest in education and training in ICT areas.

(iv) Independence of the NRA. An independent National Regulatory Authority, whether 'merged' or not, is an essential ingredient for investor confidence. We encourage an appreciation of three dimensions of independence:

- i) Independent of government direction (even if generally a requirement to comply with overall policy is in place) – the NRA should be able to take action without approval and not be subject to micro-directive from government.
- ii) Independent of any operator. In most economies the NRA is not directly controlled by any operator but in some is heavily influenced by government-related operators.
- iii) Independence and integrity: We recommend an independent board with some independent, non-executive directors.

Recommendation ASEAN General 4: Independence of the NRA is an essential part of investor confidence. Governments are encouraged, working with industry, to take steps to ensure that the NRA is independent, based on three dimensions.

(v) Spectrum plans. Most importantly, a published national spectrum plan, following industry consultation we believe follows. As far as possible, technology neutrality is recommended.

Recommendation ASEAN General 5: The great benefits of having a consulted national spectrum plan, should be realised.

(b) Special Business Development focus: Mobile Banking and Mobile Payments.

This is an exciting development in the banking sector and in the mobile services sector. While some economies have not yet evolved to readiness for such services, being able to plan for them is useful.

It is also noted that mobile banking and mobile e services have been used in developing or emerging markets to give greater access to finance and financial services for lower income earners, who are often below the traditional level of attractiveness to many banks. Mobile operators have also aligned with banks through a range of business models.

Many operators have developed mobile banking solutions, including Telenor and others. Orange has developed Orange Money which allows transfer of money between users. In Africa only, there are now three million customers in eight countries all over the continent. This figure has tripled in one year. The three main services are:

- money transfers, where users can send money using their phone to any Orange mobile customer in the country;
- payments, giving users an easier way to pay their electricity, water, television or phones bills, as well as providing a simple way to buy mobile phone credit from any location;
- financial services, including solutions facilitating savings and insurance.

Orange plans to expand the Orange Money offer in the near future.

In Kenya, according to a recent Credit Suisse report, revenues from mobile money contribute 16% of Safaricom's (a leading mobile network operator in Kenya, subsidiary of Telkom Kenya) total service revenues, driven by M-Pesa (a mobile payments business). As of September 2011, M-Pesa's customer base numbered 14.9 million, which represents 82.4% of Safaricom subscribers and 37% of Kenya's population. In the six months between April and September 2011, US\$3.5bn worth of transaction were made via M-Pesa. This is the equivalent of approximately 20% of Kenyan GDP. As of September 2011, there were 32,000 M-Pesa agents, far outnumbering the less than 1,000 Kenyan banks.

The CS report notes: "The foothold mobile money has in Kenya is by far the greatest of any country worldwide. Kenya's example though shows the potential for mobile money in emerging markets, launched as it was in Kenya comparatively early (in 2007). While not all emerging markets may be as ripe for such expansion, Safaricom's significant success with M-Pesa shows the potential, in our view".

M-Paisa, a similar system in Afghanistan, won the 'Most Innovative Telecom Project' award at the region Telecom Asia 2011 awards.

In the EU, the Single Euro Payments Area (SEPA), which is based on the premise that there should be no distinction between cross-border and domestic electronic retail payments in euro across the EU. The SEPA project covers the key retail payment instruments: credit transfers, direct debits and payment cards. This represents a stage of integration beyond where ASEAN is now, but illustrates further potential.

Recommendation ASEAN General 6: ASEAN ICT businesses will be pleased to engage with governments better to appreciate the opportunities of mobile banking, mobile payments etc, and to be aware of the kind of policy and regulation changes which may be necessary to support the initiatives.

(c) ASEAN ICT Masterplan

Background on the ASEAN ICT Masterplan is in the Annex to this paper. We welcome the ASEAN ICT Masterplan as basis for enhancement of the role the industry plays in the member economies and towards ASEAN economic integration. Through the Pillars and Foundations (and the details on which they are based), the opportunity to engage with major government policies in these areas will support enhanced outcomes for the economies, for consumers and for economic integration.

In this context we highlight in particular certain **key areas of interest**:

- ASEAN Broadband Corridor and the very positive effect which broadband services can have on member economies and on economic integration.
- Building capacity through ICT skills enhancement
- PPP developments as a good route to ensure infrastructure is available to support wider aims
- The promotion of level playing fields and pro-competitive forces

We would also like to note the following areas **where further developments will be needed**:

- i) Free Movement of skilled workers – support for ease of labour and immigration issues which can sometimes be an impediment and can appear inconsistent with the aims of the Masterplan
- ii) AEC Scorecard sometimes seems hard to reconcile with the anecdotal or experiential evidence. We note with encouragement para 68 of Chair's Statement of the 19th ASEAN Summit in this regard.
- iii) A better understanding of the aims and expectations concerning the telecoms sector in the context of AFAS and in particular the foreign equity limit targets applicable to the telecoms sector (eg 51% by December 2010 and 70% by 2015). The principles of safeguards in allowing for investor direction-setting as reflected in the ACIA should also be noted.

- iv) Inappropriate restrictions on foreign participation. In this regard the NBTC in Thailand is commended for setting up a means for reviewing the 'Foreign Dominance' regulation.

Recommendation ASEAN General 7: The ASEAN ICT Masterplan includes many projects and strategies designed to achieve valuable and valued outcomes. In particular we encourage governments to develop broadband capabilities, to support PPP models, ICT reskilling and skilling support level playing fields and effective competition regulation. In particular there are some specifics desired:

- (i) free movement of skilled workers, (ii) an understanding of real effective progress, (iii) foreign equity levels (iv) avoid inappropriate restrictions on foreign investment.

C. National Economy level focus

(a) Singapore

(i) The cost of bandwidth in Singapore needs continual monitoring. The 2009/2010 Market Survey of the Asia Pacific Carriers Coalition (APCC) showed an increasing gap of prices for business customer's access solutions in Singapore vs Hong Kong. This appears to be due to some lower levels of competition due to timing of liberalization. Further the ownership is different – in Hong Kong it is in private hands (and there are more relevant operators), in Singapore the larger players are government-related. Whether some intervention is thus necessary needs to be determined. The issue however should not be assumed to be merely an outcome of efficient market forces.

The current architecture of the NGNBN (Nationwide Next Gen Broadband Network) is focused on consumers and SME business customers. Thus, the NGNBN does not support MNC customer base and therefore does not offer lower prices in that context. Facilities-based competition and regulated pricing will continued to be needed for these larger groups.

Overall, innovative communications services for SMEs, based on fixed line or mobile services, are an important part of the attractiveness of the economy. In industry development terms, we strongly encourage greater focus in this area.

Recommendation Singapore 1: Engage and work with industry to keep the effective cost of bandwidth low.

(ii) Net neutrality

The right and need of network operators to dimension, manage and shape networks is important. While we recognise that requirement, we would not support the blocking of legitimate Internet content for unfair competitive advantage (and we support the iDA's recommendation in this regard). Services and applications and ISPs and telecom network operators should be prohibited from blocking legitimate Internet content, services and applications. Broadband providers should not be allowed to favour their own or commercially affiliated content, services and applications over others and it is the end-users who should choose which Internet content, services and applications to access. "Blocking" should be understood not only as outright blocking, but also as service degradation so as to render particular content, service, application or unusable (*de facto* blocking). We recognize that operators must be able to manage their networks – as they always have - and that they must be permitted to find innovative commercial models to fund the significant investment needed for the deployment of next generation networks. Such a policy would be consistent with consumer

protection and competition rules in most countries and we would encourage the continued development of this approach as the market evolves.

Recommendation Singapore 2: In implementing net neutrality policies, continue to work with industry to ensure a balance between allowing operators to manage and dimension networks and avoid inappropriate blocking.

(iii) ICT skills are always in short supply. Our recommendation is to strive for an innovative and entrepreneurial mindset in graduates and other ICT industry participants. This implies a change to education and also to certification for ICT skills in some markets. In Singapore, educational focus on innovative solutions, creative problem solving and overall contribution to efficiency are essential. The tax based incentives (eg the Productivity and Innovation Credit) is welcomed; some industry based developments are also noteworthy. Other enhancements to a mindset of innovation and greater productivity are also essential.

Recommendation Singapore 3: An holistic approach to ICT skilling, enhancing innovation and productivity.

(iv) The Data Protection legislation has been widely welcomed by industry and consumers. Our recommendation however is not to have a central Do Not Call register at this stage. Rather the regime of mandated data privacy is new and the opportunity in our recommendation should first be taken to ensure that an enforced call restriction regime is undertaken by businesses. Our reasons appear in our submissions.

Recommendation Singapore 4: Consider in the review of the draft legislation the benefits of not have yet a central DNC register.

(b) Thailand

(i) Concessions and general structure; competition

The telecoms industry in Thailand has never had the best opportunities to evolve structurally. Ultimately the concession era (once useful) must become a thing of the past with all operators in a level playing field on arms'-length licensed terms from the one regulator, the NBTC, with a wholesale market, arms'-length licensing on equal terms and enforced competition regulation, will all be needed.

Converting or terminating the concessions has raised some complex issues but is nevertheless essential, and highly desirable prior to release of new 3G spectrum. One solution to deal with the latter issue is to allow the concessions to run for wholesale use only.

We have welcomed the general policy vision and approach of the telecoms and related masterplans of the NBTC. We also look forward to the development of a third, five year ICT masterplan by the MICT.

While price based competition has taken hold in 2G markets, there is little service and innovation competition.

Recommendation Thailand 1: Concession conversion / termination has not gone away and still needs to be dealt with, ideally ahead of new 3G issuance. Consider the value of a properly structured industry in achieving free and fair competition and in allowing the concessions to continue on a wholesale basis.

(ii) Broadband & wholesale

Great cognizance should be taken of international trends in **broadband** development. That an existing State Owned telco Enterprise (and an unevolved one at that) as the centerpiece of the nation's broadband infrastructure is not likely in our view to produce the best result. The re-monopolisation of broadband infrastructure and services is in our view not a healthy trend/ It is well acknowledged in various reports that the state of broadband infrastructure and services lags many other nations and is an impediment to Thailand's competitiveness.

An effective wholesale structure and market for broadband services are needed. While there are some positive policy moves there are concerns about re-monopolisation. Key issues needing attention are how an effective wholesale broadband market will be created, some issues concerning whether existing policy can meet overall objectives, the cost of implementing government policy, the source of the investment needed, making the investment attractive to the private sector with an overall aim of achieving a realistic target of a large percentage of the population for quality broadband services within a reasonable time and ensuring a competitive structure. The JFCCT has made several submissions on these issues.

Recommendation Thailand 2: Effective broadband requires a wholesale market, as does a more efficient industry. Industry and the industry groups are pleased to confer with government on these matters.

(iii) Foreign investment

We also recommend the raising of **foreign equity limits** for *all* categories of telecoms licences, with a closer review of some possible limitation in those parts of category 3 licences where fixed line services have a domestic national obligation. The exceptional allowance of high foreign equity levels in category 1 licences should be made an overt policy.

The NBTC in Thailand is commended for setting up a means for reviewing the '**Foreign Dominance**' regulation. The regulation appears not to sit well with the intentions of AFAS and ACIA, and other trade agreements, and has raised questions about how competitive the industry would be. The JFCCT and EABC have made submissions on this matter.

Recommendation Thailand 3: The review by NBTC of the Foreign Dominance regulations is welcomed; a review of foreign ownership restrictions in a wider sense will be welcomed also.

(iv) Spectrum

We commend the NBTC for publishing and arranging a public hearing on a national spectrum plan. The planning for new 3G spectrum and looking ahead 4G spectrum with possible simultaneous release, are welcomed. Re-farming of 1800 MHz spectrum is also important.

Recommendation Thailand 4: Continue to engage with industry on the 3G and LTE plans.

(v) Skills, free movement

The work permit and visa regimes we believe need some major changes to support availability of skills. We commend all initiatives to enhance the development of critical thinking skills in the education and training context.

Recommendation Thailand 5: To be competitive and effective, a major revision to work permit and visa restrictions is needed. Critical thinking skills in ICT continue to need upgrading.

(c) Cambodia

The government's action in taking steps to establish a regulator (the Telecoms Regulator of Cambodia - TRC) is to be commended. Industry engagement in the formation of the regulator, its role and how it will operate, are very much encouraged.

Also noted is the large number of mobile operators, given the size of the market. We observe in time that some kind of industry consolidation in the sector may be anticipated.

The move from oligopoly market structure to full competition with a well-recognised model will be most welcomed in time.

Three areas of the telecoms industry are highlighted.

(i). Licensing regime

The large number of mobile operators suggests overcrowding in the space and hyper competition. Such a situation may not be providing for optimal competition where competition on innovation and service are also important. The situation seems to having the effect of reducing total revenues in the sector, whereas overall growth on number of customers, on services and revenue would be more attractive. This may be putting sustainability of the sector at risk. Terms of the licenses are also not publicly available. It is recommended that an industry study on optimal numbers would be beneficial to the sector, to the economy and to consumers and to make licence terms as standardised as possible, and publicly available.

Recommendation Cambodia 1: A review of the optimal number of operators, mainly on economic grounds and with economic criteria, seems inevitable. We seek views on this matter. We would recommendation more visibility of licence terms.

(ii). Management of scarce economic resource e.g. Spectrum

Issuing more licences does not appear to be resulting in efficiency gains. Licenses may be issued to accommodate new entrants yet there is duplication of investment, lack of value added services, commoditisation of voice service licensees and existing operators have been requested to give away part of the spectrum to new entrants without compensation.

On a related matter, globally, more spectrum in 700/800 MHz, digital dividend spectrum, 2.3, 2.5 and 2.6 GHz to support mobile broadband, Cambodia is yet to produce a clear spectrum policy, making Cambodia's spectrum management continues to be appear fragmented. A national spectrum plan with industry consultation would be welcomed.

The economy in our view would benefit from such a consultation which could then include various ministries – eg Ministry of Post and Telecommunications (MPTC), Ministry of Interior and Ministry of Information. (Some of key future mobile broadband spectrum is not under the ambit of MPTC).

Recommendation Cambodia 2: A multi-department consultation, with industry, on overall spectrum planning and management.

(iii). Interconnection regime enhancement

The interconnection regime in Cambodia is in the early stages of being regulated. Telecom Cambodia ("TC") currently has the exclusive right to act as mandatory transit point for both domestic and international termination. This model appears to have increased the total cost of delivering services to subscribers. Mobile operators also subsidize calls terminating onto the mobile network from TC, at the rate of US2.65 cents per minute. The industry welcomes further consultation on the matter, with a view to a possible symmetrical termination rate for fixed and mobile termination.

Recommendation Cambodia 3: A review, involving industry, of the interconnection regime.

(d) Vietnam

(i) Improving international investment opportunities

The telecom sector is still largely dominated by a small number of 100% state owned enterprises, which combined account for more than 90% of the market share. In order for smaller operators to effectively compete, further consolidation within the mobile sector will be needed.

Although there are WTO provisions, investment possibilities in the telecom sector remain unclear. The current draft decree on the Telecommunications Law does not yet serve to bring out substantial clarifications. International investment in the sector should be encouraged. In particular, the role and expectations towards foreign strategic investors and the criteria for their selection should be made clear and transparent. International investment can only happen with the will of the government to open up the telecom sector, and the appropriate laws in place to allow the maximum foreign ownership of up to 49% in accordance with WTO expectations.

Recommendation Vietnam 1: Speed up the equitization process of telecoms operators, starting with announcing a reliable roadmap and definite timelines for equitization in the sector.

(ii) National Network Development

A national network development plan would best focus on the broad availability of connectivity with suitable bandwidth and reliability. The current mainly price-driven competition, especially in the mobile sector, though leading to a fast reduction of consumer prices, may fail to secure a market environment to deliver long term investment in network infrastructure and services. The ability to sustain internet usage, high growth rate in the future will particularly depend on the pace of internet infrastructure development in rural parts on the country.

Recommendation Vietnam 2: Release a comprehensive National Network Development plan, following industry consultation.

(iii) Improving and communicating service quality

Current competition in the sector largely focuses on prices, but not on quality of telecom services. We welcome encouragement of competition in service quality and encourage innovation in the sector. The current benchmarking of networks and wide public communicating of the results of service quality is a good step. However, we note that the results of such benchmarking often do not match the actual user experience.

Recommendation Vietnam 3: Improve and expand independent benchmarking, with some industry and key user group consultation.

(iv) Encourage fair competition

It will be important to find a fair balance between competition levels sufficient to satisfy customers' needs and a regulatory environment that allows equal opportunity for long-term growth and related involvement for all investors in the sector. Accordingly, the government should look at further enhancement of regulations which encourage fair competition and efficient use of resources, and which would avoid destructive losses of smaller players in the sector, and ensure long term availability of choice for customers.

Recommendation Vietnam 4: Further enhance regulations that encourage fair competition and efficient use of resources.

(v) Independent supervisory

Recommendation Vietnam 5: Establish an independent agency with real powers and the means and tools to secure the further development of the sector and service availability for the country.

D. Annex 1: ASEAN ICT Masterplan background

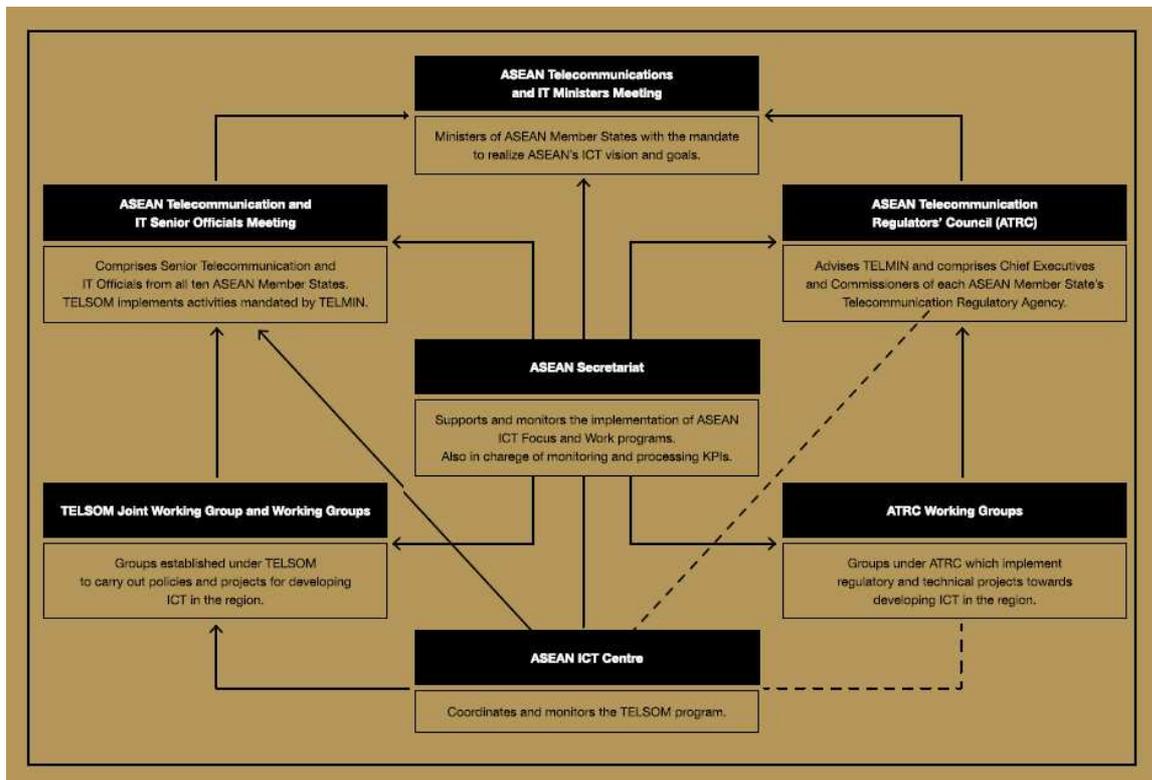
Since September 2003 the ASEAN Telecommunications and Information Technology Ministers (TELMIN) have adopted various programmes for employing ICTs to strengthen and develop ASEAN economically, politically and socially. Economically, to reduce the transactions costs of intra-ASEAN trade and boost ASEAN international trade and investment; politically to develop a “people-oriented” approach to growth and development; and socially to bridge the digital divide and open the door to equal opportunity to drive skills development, innovation and entrepreneurship. In broad outline, this is the ICT component of the vision ASEAN has for itself.

The vision is most comprehensively spelt out in the 2010 Masterplan on ASEAN Connectivity: One Vision, One Identity, One Community (MPAC). The MPAC was drawn up in consultation with the Japan-initiated Asian Development Bank (ADB) and the Tokyo-based Economic Research Institute for ASEAN and East Asia (ERIA), UNESCAP and the World Bank.

At first appearance the ASEAN ICT Masterplan 2015 or AIM 2015 may look like the implementation plan for the ICT components of the MPAC, including timelines. It has some similarities to Strategy 6 of the MPAC, including establishing a regional broadband corridor, an ASEAN Internet Exchange Network, developing common or compatible regulatory and technical frameworks, reviewing Universal Service Obligations, and prioritising the roll-out of broadband services to schools. But AIM 2015 came from the ATRC Working Group, whereas the MPAC came from the TELSOM Working Group; a parallel process albeit with a slightly different time frame.

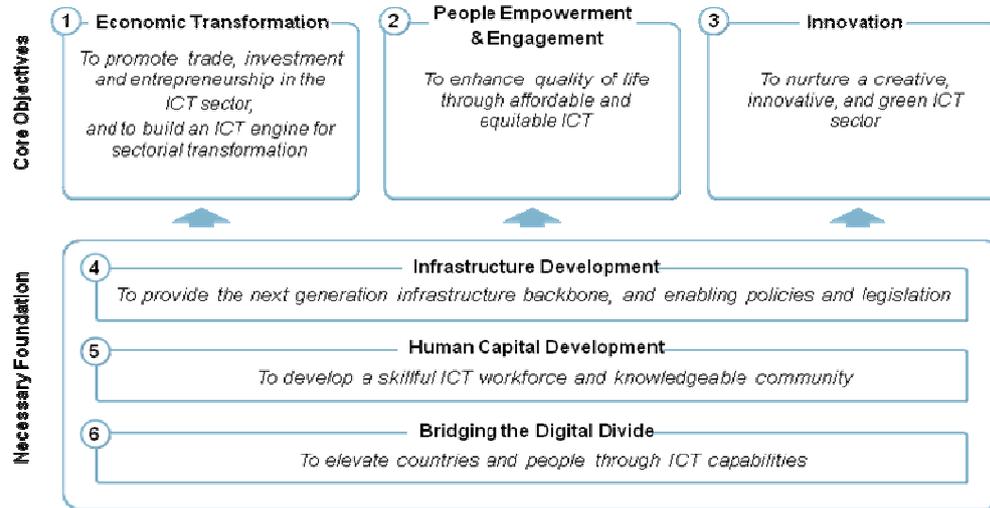
AIM 2015 is not the first of ASEAN initiatives in the field of ICTs. Past initiatives include the e-ASEAN Framework Agreement, a database for National Information Infrastructure profiles, national Computer Emergency Response Teams (CERTS) in 2005, a Digital Divide Database and others. AIM 2015 was agreed at the 9th ASEAN TELMIN meeting to “bring the ASEAN ICT sector to a higher level and to reinforce the role of ICT for ASEAN integration.” This was followed by an implementation plan and the official announcement of AIM 2015 at the 10th ASEAN TELMIN meeting in Kuala Lumpur in Jan 2011.

Governance Structure



The three Pillars and the three Foundations

“Towards an Empowering and Transformational ICT: Creating an Inclusive, Vibrant and Integrated ASEAN”



E. Annex 2 : Summary of Key Recommendations

Theme	Recommendations for Consideration
Regional Focus	
Industry structure and general operation of the telecoms industry	<ul style="list-style-type: none"> Recognition that structure of a telecoms industry is important, it needs fair and equal treatment, ideally all operators under the same kind of licence conditions from a single regulator where foreign investment is encouraged.
Competitiveness and dual role of the telecoms industry	<ul style="list-style-type: none"> Competition regulation needs to be clear, fair and enforced.
Skills, Education and free movement	<ul style="list-style-type: none"> Governments should recognise the benefits of, and support, free movement of a range of skilled people and invest in education and training in ICT areas.
Independence of National Regulatory Authority (NRA)	<ul style="list-style-type: none"> Independence of the NRA is an essential part of investor confidence. Governments are encouraged, working with industry, to take steps to ensure that the NRA is independent, based on three dimensions.
Spectrum plans	<ul style="list-style-type: none"> The great benefits of having a consulted national spectrum plan, should be realised.
Special Business Development focus: Mobile Banking and Mobile Payments	<ul style="list-style-type: none"> ASEAN ICT businesses will be pleased to engage with governments better to appreciate the opportunities of mobile banking, mobile payments etc, and to be aware of the kind of policy and regulation changes which may be necessary to support the initiatives.
ASEAN ICT Masterplan	<ul style="list-style-type: none"> The ASEAN ICT Masterplan includes many projects and strategies designed to achieve valuable and valued outcomes. In particular we encourage governments to develop broadband capabilities, to support PPP models, ICT reskilling and skilling support level playing fields and effective competition regulation. In particular there are some specifics desired: <ol style="list-style-type: none"> (i) free movement of skilled workers, (ii) an understanding of real effective progress, (iii) foreign equity levels, (iv) avoid inappropriate restrictions on foreign investment.
National Economy Level Focus	
1. Singapore	
(i) The cost of bandwidth	<ul style="list-style-type: none"> Engage and work with industry to keep the effective cost of bandwidth low.
(ii) Net neutrality	<ul style="list-style-type: none"> In implementing net neutrality policies, continue to work with industry to ensure a balance between allowing operators to manage and dimension networks and avoid inappropriate blocking.
(iii) ICT skills	<ul style="list-style-type: none"> An holistic approach to ICT skilling, enhancing innovation and productivity.
(iv) The Data Protection	<ul style="list-style-type: none"> Consider in the review of the draft legislation the benefits of not have yet an central DNC register.

2. Thailand	
(i) Concessions and general structure; competition	<ul style="list-style-type: none"> Concession conversion / termination has not gone away and still needs to be dealt with, ideally ahead of new 3G issuance. Consider the value of a properly structured industry in achieving free and fair competition and in allowing the concessions to continue on a wholesale basis.
(ii) Broadband & wholesale	<ul style="list-style-type: none"> Effective broadband requires a wholesale market, as does a more efficient industry. Industry and the industry groups are pleased to confer with government on these matters.
(iii) Foreign investment	<ul style="list-style-type: none"> The review by NBTC of the Foreign Dominance regulations is welcomed; a review of foreign ownership restrictions in a wider sense will be welcomed also.
(iv) Spectrum	<ul style="list-style-type: none"> Continue to engage with industry on the 3G and LTE plans.
(v) Skills, free movement	<ul style="list-style-type: none"> To be competitive and effective, a major revision to work permit and visa restrictions is needed. Critical thinking skills in ICT continue to need upgrading.
3. Cambodia	
(i). Licensing regime	<ul style="list-style-type: none"> A review of the optimal number of operators, mainly on economic grounds and with economic criteria, seems inevitable. We seek views on this matter. We would recommend more visibility of licence terms.
(ii). Management of scarce economic resource e.g. Spectrum	<ul style="list-style-type: none"> A multi-department consultation, with industry, on overall spectrum planning and management.
(iii). Interconnection regime enhancement	<ul style="list-style-type: none"> A review, involving industry, of the interconnection regime.
4. Vietnam	
(i) Improving international investment opportunities	<ul style="list-style-type: none"> Speed up the equitization process of telecoms operators, starting with announcing a reliable roadmap and definite timelines for equitization in the sector.
(ii) National Network Development	<ul style="list-style-type: none"> Release a comprehensive National Network Development plan, following industry consultation.
(iii) Improving and communicating service quality	<ul style="list-style-type: none"> Improve and expand independent benchmarking, with some industry and key user group consultation.
(iv) Encourage fair competition	<ul style="list-style-type: none"> Further enhance regulations that encourage fair competition and efficient use of resources.
(v) Independent supervisory	<ul style="list-style-type: none"> Establish an independent agency with real powers and the means and tools to secure the further development of the sector and service availability for the country.