

PO Box 286
Castries
Saint Lucia

November 30, 2015

Managing Director
ECTEL
PO Box 1886
Vide Boutielle
Castries

Dear Sir,

Revised Draft Electronic Communications Bill (EC Bill)

Further to your request for comments on the Revised Draft Electronic Communications Bill (EC Bill) I hereby submit the following three comments.

1. **Section 37** provides a Procedure for the Grant of Licence. The issuance and signing of several Service Licences and Licence Sub-Classes may become quite onerous for the Minister. A provision should be made in the Procedure where the Minister, by Order, may devolve authority to the Commission for the issuance of Service Licences and Sub-Classes thereof.
2. **Section 72** refers to Communications During an Emergency. It is possible that the Head of State could be incapacitated, God forbid, by a sudden cataclysmic event and provision should be made for the Head of State from another OECS country to assume direct control under protocols established by the OECS Commission and/or the Regional Security System (RSS).
3. The location and installation of telecommunications towers can have an impact on the aesthetics of the natural and built environments and the EC Bill should explicitly give a procedure for the installation of telecommunications towers. The Commission should have oversight over colocation and installation of towers and should consult with national planning authorities and agencies like the St. Lucia National Trust when considering applications for erection of telecommunications towers.

I trust that these comments will be considered by ECTEL.

Best regards,

Anselm Gittens, J69AH
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