

**Lebanese Republic**  
**Ministry of Telecommunications**  
**National Telecommunications and**  
**Digital Infrastructure Policy**  
**(2026–2030)**

DRAFT

## Abbreviations and Acronyms

<b>5G</b>	Fifth-generation mobile technology
<b>AI</b>	Artificial Intelligence
<b>BEREC</b>	Body of European Regulators for Electronic Communications
<b>EU</b>	European Union
<b>FTTH</b>	Fiber To The Home
<b>FWA</b>	Fixed Wireless Access
<b>GATS</b>	General Agreement on Trade in Services
<b>GSMA</b>	GSM Association
<b>IoT</b>	Internet of Things
<b>ISP</b>	Internet Service Provider
<b>ITU</b>	International Telecommunication Union
<b>IXP</b>	Internet Exchange Point
<b>KPI</b>	Key Performance Indicator
<b>MNO</b>	Mobile Network Operator
<b>MoT</b>	Ministry of Telecommunications
<b>MVNO</b>	Mobile Virtual Network Operator
<b>NNP</b>	National Numbering Plan
<b>PPP</b>	Public Private Partnership
<b>RoL</b>	Republic of Lebanon
<b>RoW</b>	Right of Way
<b>SMP</b>	Significant Market Power
<b>TRA</b>	Telecommunications Regulatory Authority
<b>USO</b>	Universal Service Obligation
<b>VHCN</b>	Very High Capacity Network
<b>VNO</b>	Virtual Network Operator
<b>WTO</b>	World Trade Organization

## Table of Contents

<b>Executive Summary</b> .....	<b>4</b>
<b>1) Purpose and scope</b> .....	<b>7</b>
<b>2) National Vision (2026–2030 and beyond): Lebanon as a Digital Hub</b> .....	<b>9</b>
<b>3) End-State Vision</b> .....	<b>10</b>
<b>4) Guiding principles</b> .....	<b>11</b>
1) Telecommunications as critical national infrastructure serving the public interest.....	11
2) Separation of roles and accountability .....	11
3) Universal Service Obligation .....	11
4) Independent, predictable, and credible regulation .....	11
5) Effective competition and prevention of market abuse .....	11
6) Technology neutrality and innovation .....	11
7) Consumer protection, trust, and security .....	12
8) Transparency, objectivity, and non-discrimination .....	12
9) Investment, resilience, and long-term sustainability .....	12
10) Public value and professional governance of state assets .....	12
11) Proportionate regulation and orderly integration of market participants .....	12
<b>5) Institutional Roles and Responsibilities</b> .....	<b>13</b>
<b>6) Strategic Policy Pillars</b> .....	<b>15</b>
1) Pillar 1 — Stabilization, Service Continuity, and Protection of the Public Interest .....	15
2) Pillar 2 — Rule of Law Restoration and Market Normalization .....	18
3) Pillar 3 — Institutional Architecture and Regulatory Independence .....	19
4) Pillar 4 — Licensing and Market Entry .....	19
5) Pillar 5 — Infrastructure Deployment, Right-of-Way, and Open Access .....	21
6) Pillar 6 — Competition and Economic Regulation .....	23
7) Pillar 7 — Mobile Networks, Spectrum, and Access Technologies .....	24
8) Pillar 8 — Resilience, Security, and Digital Hub Enablement .....	25
<b>7) Transitional and Reform Approach</b> .....	<b>28</b>
<b>8) Phased Sector Liberalization Program</b> .....	<b>29</b>
<b>9) Cross-Government Coordination</b> .....	<b>33</b>
<b>10) Implementation, Monitoring, and Review</b> .....	<b>34</b>
<b>11) What This Policy Does Not Do</b> .....	<b>34</b>
<b>12) Final Policy Statement</b> .....	<b>35</b>
<b>13) Annex A — Selected International Benchmarks Informing This Policy</b> .....	<b>36</b>
<b>14) Annex B — Reference Sources (for convenience)</b> .....	<b>37</b>

**Issued by:** Ministry of Telecommunications

**Legal Basis:** Telecom Law No. 431/2002

**Nature:** Ministerial Policy Directive

## Executive Summary

Reliable, affordable, and resilient telecommunications are essential to Lebanon's economic recovery, social cohesion, and the effective delivery of public services. Yet for many years the sector has been constrained by weakened institutions, uneven regulatory oversight, and prolonged underinvestment. Service quality and affordability have deteriorated, informal practices have expanded, and uncertainty has eroded consumer trust and investor confidence. As a result, the telecommunications sector has been unable to play its full role in supporting economic growth, digital transformation, and national resilience.

This Policy sets out the Government of Lebanon's clear and authoritative direction to restore order, credibility, and sustainability in the telecommunications and digital infrastructure sector, in full accordance with Telecom Law No. 431/2002. It establishes a disciplined and sequenced reform trajectory built around three core objectives:

- (1) stabilizing services and protecting the public interest in the short term;**
- (2) restoring the rule of law and effective regulation through an orderly and time-bound transition; and**
- (3) preparing the sector for long-term liberalization, competition, and investment.**

Transitional measures are explicitly designed to safeguard service continuity for citizens, businesses, and critical public services, while ensuring that illegality is neither normalized nor perpetuated.

The Policy reaffirms the strict separation of institutional roles as the cornerstone of reform. The Ministry of Telecommunications defines national policy, strategic objectives, and ownership oversight over state assets. The TRA regulates independently through licensing, spectrum management, competition policy, tariff and quality-of-service oversight, consumer protection, and complaint resolution. Operators—public or private—function on a commercial basis under transparent licenses and enforceable obligations. This institutional clarity is essential to restoring governance credibility, regulatory confidence, and investor trust.

Within this framework, the Policy articulates a long-term vision for a competitive, resilient, and innovation-driven digital sector that supports Lebanon's recovery and digital ambitions.

The progressive development and liberalization of Lebanon's telecommunications sector is not an exceptional or crisis-driven policy choice, but the natural course adopted by advanced economies that treat digital connectivity as critical national infrastructure and a foundational enabler of modern life, public services, and the digital economy. In a world characterized by accelerating digital transformation, the availability of resilient, high-capacity, and scalable telecommunications networks has become a prerequisite for economic growth, competitiveness, and job creation.

In Lebanon's case, years of financial and institutional disruption have resulted in underinvestment and infrastructure degradation, making sector reform both urgent and unavoidable. Addressing these challenges requires a realistic and sequenced reform approach that modernizes the sector and restores operational efficiency without resorting to premature or distressed divestment of public assets.

Accordingly, the structured involvement of the private sector in the management, operation, and development of state-owned telecommunications assets—supported by clear and enforceable investment obligations—constitutes a core reform instrument aimed at improving performance, agility, and innovation, while insulating day-to-day operations from political discretion. This approach prioritizes operational excellence and service improvement over ownership change.

Such private-sector participation is embedded within a phased reform framework that first restores regulatory order, strengthens the independence and capacity of the TRA, and corporatizes state-owned assets under transparent and professional governance. Only once market stability, institutional maturity, and competitive safeguards are demonstrably in place may the State, through sovereign decisions of the Council of Ministers and in accordance with the law, consider subsequent forms of partnership or partial or full divestment, at a timing that maximizes public value and protects the national interest.

This reform trajectory neither expands the State's role as a commercial operator nor undermines private initiative. Rather, it establishes a balanced, liberalized, and competitive telecommunications ecosystem in which the State sets policy and safeguards the public interest, the regulator ensures fairness and accountability, and the private sector acts as a primary driver of investment, innovation, and growth.

Private-sector participation in state-owned telecommunications assets is therefore identified as a core structural reform to improve efficiency, service quality, and long-term sustainability. Such participation shall follow the corporatization and operational stabilization of Liban Telecom, once sound governance, institutional strengthening, and financial transparency have been demonstrably achieved, and in any case no later than two years after corporatization, in line with Telecom Law No. 431.

For mobile network operations, private-sector participation shall be pursued at a stage of demonstrated operational maturity and efficiency that maximizes market value and ensures optimal cash proceeds for the Government.

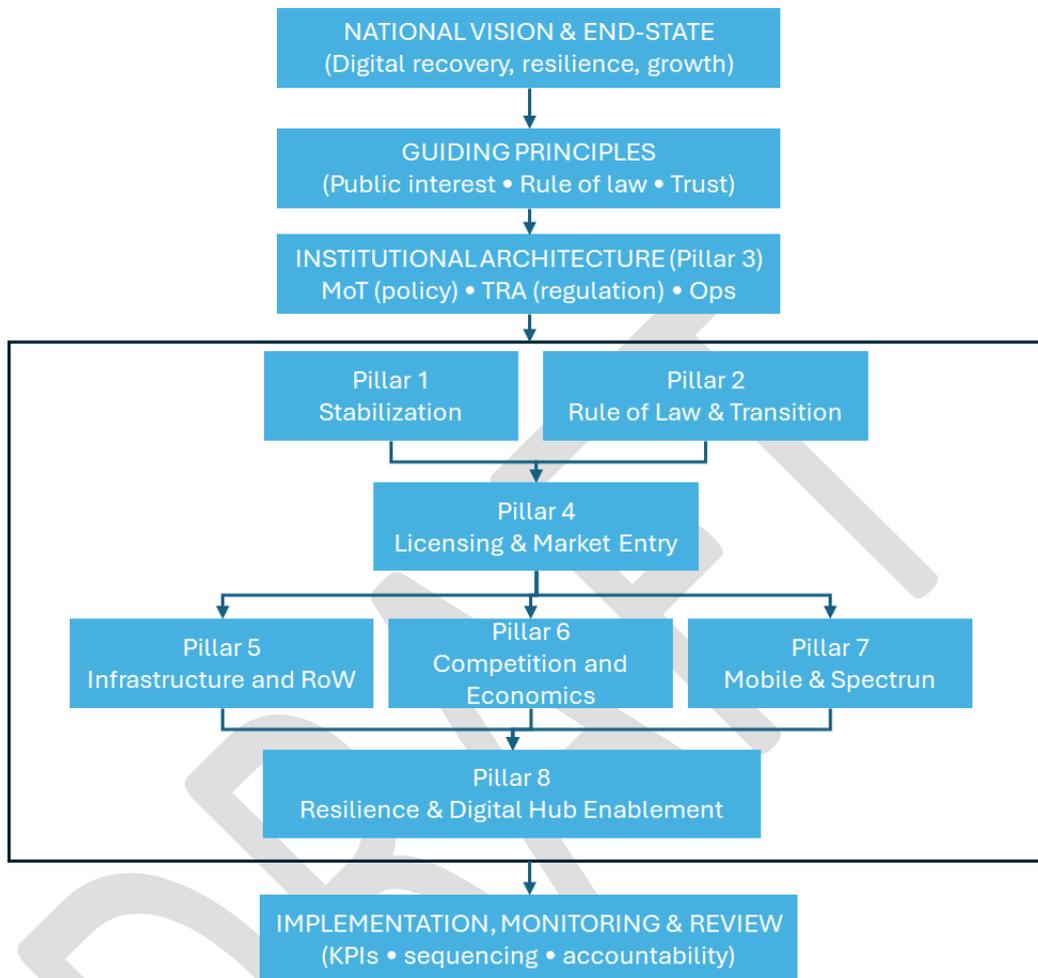
All forms of private-sector participation — whether through management contracts, strategic partnerships, partial divestment, or full privatization — shall be designed and implemented in a manner that preserves effective competition, safeguards the public interest, and ensures sustainable value creation for the State.

Any decision in this regard falls exclusively within the competence of the Council of Ministers.

In all scenarios, state-owned operators shall operate under the same regulatory, licensing, and market conditions applicable to private operators, without preferential treatment or exemptions, and in full compliance with Telecom Law No. 431.

This Policy follows a coherent and sequenced architecture. Stabilization and rule-of-law restoration enable credible institutions. Licensing acts as the market gateway, supported

by infrastructure access, competition policy, and spectrum management. These pillars together deliver a resilient, secure, and future-ready digital sector, with implementation and monitoring ensuring accountability and continuity.



## 1. Purpose and scope

This document constitutes a national telecommunications policy, not an implementation strategy or operational plan. It sets the Government's long-term direction, objectives, principles, and institutional roles for the sector, while deliberately refraining from prescribing detailed actions, investment programs, or timelines. The Policy defines what the State seeks to achieve and why, and establishes the framework within which strategies, regulatory instruments, and operational decisions shall be developed by the competent authorities in accordance with the law. Detailed sector strategies, roadmaps, and implementation measures will be formulated separately, consistent with this Policy and adapted to evolving market, institutional, and economic conditions.

This Policy is based on Telecom Law No. 431/2002 and specifically sets out the Government of Lebanon's strategic direction for the telecommunications and digital infrastructure sector. It constitutes a macro-level policy framework, not a regulatory, licensing, or operational act.

It does not regulate emerging digital areas like data governance, cloud services, cybersecurity, AI, or digital platforms—these will need separate laws and frameworks in the future. Such topics will be handled through parliamentary processes and collaboration across government, building on the foundations this Policy sets.

The Policy establishes a unified framework to:

- Define a clear national vision and reform trajectory for the telecommunications and digital infrastructure sector over the medium to long term;
- Clarify institutional roles and responsibilities between the Ministry of Telecommunications, the TRA, and licensed market participants, in accordance with the law;
- Set national objectives, priorities, and guiding principles to restore credibility, competition, and sustainability in the sector;
- Provide the authoritative policy framework within which the TRA shall exercise its regulatory powers independently and coherently;
- Direct the TRA to translate this Policy into appropriate regulatory instruments, licensing frameworks, authorization regimes, and enforcement measures, consistent with its statutory authority;
- Enable phased and sequenced implementation over a multi-year horizon, balancing service continuity, rule-of-law restoration, and long-term market development;
- Cover the full digital connectivity ecosystem in Lebanon, including fixed and mobile broadband networks; fiber-based and alternative access technologies such as wireless and satellite; national and international connectivity infrastructure; enabling frameworks for network deployment and investment (including rights-of-way, infrastructure sharing, and access to essential facilities); and consumer protection, competition, quality of service, and market governance as foundational elements of a sustainable sector.
- Given Lebanon's starting conditions, this Policy does not predefine rigid national rollout targets. Instead, it sets the direction to the TRA to establish, publish, and

periodically review measurable performance indicators for coverage, quality, affordability, and resilience, aligned with national capacity and economic conditions.

This Policy is rooted in Lebanese law, national priorities, and the public interest. Reform decisions reflect local needs for service continuity, consumer protection, asset management, and institutional trust. International best practices are referred to only when they align with Lebanon's goals and legal framework and do not override national sovereignty.

This Policy is designed to remain valid over time, regardless of changes in technology, market structure, or ownership models. It sets what the Government seeks to achieve and the principles that must guide action, while leaving the detailed design, sequencing, and enforcement of regulatory measures to the TRA, in line with the law.

References to 'universal service' in this Policy are used strictly in accordance with Article 26 of Telecom Law No. 431. Broader objectives relating to broadband availability, affordability, and inclusion are articulated as policy goals and shall be implemented through regulatory instruments consistent with the Law.

DRAFT

## 2. National Vision (2026–2030 and beyond): Lebanon as a Digital Hub

Lebanon's national vision is to position the country as a regional digital hub for connectivity and digital services, supported by secure, resilient, and high-capacity telecommunications infrastructure, effective competition, strong consumer protection, and a trusted, independent regulatory environment. This ambition represents a long-term aspiration, directional objective, and its realization depends on restoring institutional stability, reinforcing the rule of law, strengthening infrastructure resilience, addressing energy-sector constraints, and rebuilding trust through consistent service delivery and predictable regulation. It is contingent on domestic resilience KPIs (redundant international capacity, neutral data centers, IXPs and reliable power).

The telecommunications sector shall progressively evolve toward converged digital services, enabling the integrated provision of fixed, mobile, broadband, and value-added digital services within a coherent regulatory and market framework. This evolution is intended to foster innovation, entrepreneurship, and private investment, while safeguarding consumer trust, service continuity, and national resilience.

This national vision is grounded in institutional credibility and regulatory confidence. Clear separation of roles, independent regulation, and predictable market rules are essential to restoring trust among citizens, investors, and international partners. Telecommunications policy shall therefore prioritize stability, legality, transparency, and accountability as prerequisites for sustainable sector development.

Beyond 2030, Lebanon seeks to emerge as a credible regional participant in the digital economy, leveraging its human capital, geographic position, and entrepreneurial culture, supported by resilient connectivity, strong governance, and an innovation-friendly environment.

### 3. End-State Vision

The target end-state is a stable, competitive, and investment-driven telecommunications sector that reliably supports Lebanon's digital economy, public services, and national resilience.

In this end-state:

1. **Clear and durable institutional separation** is fully established, with the Ministry of Telecommunications exercising policy leadership and ownership oversight, an independent TRA exercising effective regulatory authority, and operators functioning on a commercial and accountable basis;
2. **Independent, credible regulation** governs the sector, with predictable licensing, spectrum management, competition oversight, quality-of-service enforcement, and consumer protection applied consistently and without discrimination;
3. **Sustainable and effective competition** exists across fixed, mobile, and broadband markets, delivering improved service quality, affordability, innovation, and choice for end-users;
4. **State-owned telecommunications assets shall be corporatized and** structured in a manner that preserves the option of full or partial privatization, should the Council of Ministers so decide. They shall operate on a fully commercial basis, ensuring financial transparency, professional governance, and strict adherence to the same regulatory, licensing, and competition framework applicable to all other operators.
5. **Consumers and public institutions** benefit from reliable connectivity, enforceable consumer protection mechanisms such as transparent service conditions. This includes measurable quality standards nationwide, clear billing practices, defined quality-of-service standards, effective complaint handling, and proportionate sanctions for non-compliance, as determined by the TRA;
6. **The sector attracts sustained investment**, supports modern digital services, and contributes positively to economic growth, fiscal sustainability, and employment;
7. **Strategic options for private sector participation**, including management partnerships or partial or full privatization of state-owned assets, may be considered by the Council of Ministers, based on demonstrated market stability, institutional maturity, and governance readiness.

This end-state describes **what the telecommunications sector looks like when reform has succeeded**: credible institutions, predictable rules, effective competition, professional governance, and connectivity that underpins Lebanon's long-term digital and economic future.

## 4. Guiding principles

The following guiding principles constitute the normative foundation of this Policy. They inform, constrain, and guide all actions taken under the Policy framework and provide a consistent basis for regulatory interpretation, decision-making, and enforcement. They are intended to ensure coherence, predictability, and accountability across institutions, regulatory instruments, and market outcomes.

All measures adopted pursuant to this Policy shall be guided by the following principles:

### 1) Telecommunications as critical national infrastructure serving the public interest

Telecommunications and digital connectivity are critical national infrastructure and shall be governed in a manner that prioritizes the public interest, national welfare, service continuity, affordability, and inclusive economic and social development.

### 2) Separation of roles and accountability

Policy formulation, regulation, and commercial operations shall be institutionally and functionally separated in accordance with Telecom Law No. 431/2002. The Ministry of Telecommunications defines public policy and ownership objectives; the TRA regulates independently; and operators execute commercially under transparent licenses and enforceable obligations.

### 3) Universal Service Obligation

Broadband connectivity shall be treated as an essential service for citizens, residents, businesses, and public institutions, and a prerequisite for economic participation, social inclusion, and effective public service delivery.

### 4) Independent, predictable, and credible regulation

Regulatory powers shall be exercised independently, transparently, and consistently, providing legal certainty and predictability while remaining subject to the rule of law and lawful review.

### 5) Effective competition and prevention of market abuse

Telecommunications markets shall be structured and regulated to promote effective and sustainable competition, prevent monopolistic practices and abuse of dominance, and address market power through proportionate, transparent, and evidence-based measures.

### 6) Technology neutrality and innovation

Regulatory frameworks shall remain technology-neutral, enabling different access technologies to compete on the basis of performance, quality, coverage, and affordability, subject to applicable security, safety, and technical standards.

## **7) Consumer protection, trust, and security**

Consumer rights, transparency, service quality, privacy, data protection, cybersecurity, and effective complaint resolution are non-negotiable foundations of the telecommunications sector. Consumer trust relies on secure networks, protection of personal data, and proportionate resilience safeguards across the ecosystem.

## **8) Transparency, objectivity, and non-discrimination**

Licensing, access to infrastructure, spectrum management, and regulatory enforcement shall be conducted on objective, published, and non-discriminatory terms, applied equally to all market participants.

## **9) Investment, resilience, and long-term sustainability**

Policy and regulation shall encourage long-term investment, network resilience, and financially and environmentally sustainable deployment of digital infrastructure, supporting continuous modernization and service improvement.

## **10) Public value and professional governance of state assets**

State-owned telecommunications entities shall be subject to transparent performance reporting and professional governance standards, consistent with international best practice and appropriate parliamentary and public accountability.

## **11) Proportionate regulation and orderly integration of market participants**

Regulatory obligations and enforcement measures shall be proportionate to scale, market impact, and risk, and shall support orderly, time-bound transitions that integrate established providers acting in good faith into a lawful, competitive, and sustainable market, without delaying reform or compromising the rule of law.

## 5. Institutional Roles and Responsibilities

The Policy focuses primarily on the Ministry of Telecommunications and the TRA because it is intended to operationalize Telecom Law No. 431, which clearly defines their respective mandates. However, it does not diminish the essential role of other state institutions. It respects constitutional and legal boundaries by defining policy direction and institutional roles where the law already provides clarity, while leaving executive decision-making to the Council of Ministers and legislative authority to Parliament.

Parliament holds exclusive legislative authority. Any amendment to Telecom Law No. 431, the introduction of new licensing categories, changes to institutional mandates, or the adoption of new legal frameworks fall strictly within Parliament's competence. The Policy does not seek to substitute parliamentary authority, but rather to provide a coherent policy direction that may inform future legislative action.

The Council of Ministers plays a central role in shaping public policy and exercising executive authority. In the telecommunications sector, this includes approving major policy orientations, endorsing reform sequencing, authorizing market-opening decisions, and determining strategic matters such as the timing and scope of licensing, corporatization, and private-sector participation, in accordance with the law. This Policy fully respects this role and is designed to be implemented under the authority and oversight of the Council of Ministers.

Other public bodies—such as the Ministry of Finance, energy authorities, cybersecurity and data-protection bodies, municipalities, and public procurement entities—also have roles to play within their respective mandates. The Policy deliberately avoids duplicating or redefining their statutory powers, instead relying on coordination mechanisms and legal consistency.

The Ministry of Telecommunications plays an active and vital role in telecom through policy leadership, overseeing state-owned assets, shaping reform priorities, setting national policy, enforcing laws, coordinating during crises, and protecting national security and public services. This role respects the independence of the regulator and leaves daily commercial operations to operators, as required by Telecom Law No. 431/2002.

### Role of the Ministry of Telecommunications

The Ministry shall:

- Define national telecom and digital policy;
- Set long-term objectives and reform direction;
- Exercise ownership oversight over state Telecommunications assets;
- Coordinate across government entities and secure ministerial approvals on decisions;
- Represent Lebanon internationally.

The Ministry shall not regulate markets, manage operations, or issue individual regulatory or licensing decisions, all of which fall within the exclusive competence of the TRA.

### Role of the Telecommunications Regulatory Authority (TRA)

The TRA shall:

- Implement this Policy through regulation, licensing, and enforcement;
- Promote competition and consumer protection;
- Manage spectrum and essential facilities;
- Act independently, transparently, and professionally.

In support of regulatory credibility and stakeholder confidence, the TRA may establish non-binding consultative mechanisms to solicit expert, consumer, and civil-society input, without prejudice to its exclusive decision-making authority.

The TRA shall progressively regain and exercise its full statutory powers through a phased approach, taking into account institutional capacity, staffing, financial sustainability, and governance safeguards. Transparency, reasoned decision-making, publication of outcomes, and clear accountability shall underpin the Authority's effective independence.

### **Role of Operators and Market Participants**

Operators shall:

- Invest, deploy, and operate networks;
- Comply with licenses and regulations;
- Protect consumers and service continuity.

DRAFT

## 6. Strategic Policy Pillars

The telecommunications reform agenda set out in this Policy is structured around a coherent set of eight strategic pillars that translate national vision and guiding principles into focused regulatory and institutional directions. Each pillar addresses a distinct dimension of sector reform—ranging from stabilization and rule-of-law restoration to market opening, infrastructure deployment, competition, spectrum management, and long-term resilience—while remaining interdependent and mutually reinforcing. Together, the pillars provide a sequenced and disciplined framework that enables the TRA to exercise its mandate effectively, supports service continuity and investment confidence, and guides the sector’s transition toward a competitive, resilient, and future-ready digital ecosystem.

1. Pillar 1 — Stabilization, Service Continuity, and Protection of the Public Interest
2. Pillar 2 — Restoration of the Rule of Law and Orderly Market Transition
3. Pillar 3 — Institutional Architecture and Regulatory Independence
4. Pillar 4 — Licensing and Market Entry
5. Pillar 5 — Infrastructure Deployment, Right-of-Way, and Open Access
6. Pillar 6 — Competition and Economic Regulation
7. Pillar 7 — Mobile Networks, Spectrum, and Access Technologies
8. Pillar 8 — Resilience, Security, and Digital Readiness

### 1) Pillar 1 — Stabilization, Service Continuity, and Protection of the Public Interest

#### Objective

Ensure continuity, reliability, and affordability of telecommunications services for citizens, businesses, and critical public services during the reform and normalization period, while safeguarding consumer rights and avoiding disruptive economic or social shocks.

#### Policy Directions and Mandates

##### 1.1. Service continuity and managed transition

The TRA shall ensure that sector reform and enforcement actions are conducted in a manner that preserves continuity of service and protects critical users. Corrective measures shall be implemented through managed and proportionate transitions, avoiding sudden or widespread disruption to end-users, public-interest institutions, or essential services. The TRA is encouraged to promote contingency planning and operational preparedness to enhance continuity of service during emergencies or systemic disruptions.

##### 1.2. Unified consumer protection framework

The TRA is called to establish and enforce a comprehensive consumer protection framework applicable to all service providers during the transition and beyond. This framework shall ensure transparency of service conditions, fair marketing practices, clear identification of providers, effective complaint handling, and enforceable safeguards against abusive or misleading practices. Consumer protection obligations shall constitute

binding regulatory conditions, subject to enforcement and sanctions in case of non-compliance.

### **1.3. Universal service, digital inclusion, and affordability**

The TRA shall promote universal access to broadband services across all regions and population groups, with particular attention to affordability, service reliability, and inclusion of vulnerable users. Universal access measures shall be technology-neutral, outcome-focused, and designed to ensure minimum service quality and affordability, including appropriate mechanisms to support low-income households, students, and public-interest institutions where necessary.

### **1.4. Consumer choice, switching rights, and mobility**

End-users shall retain the right to switch providers without unreasonable barriers. The TRA shall ensure effective number portability, transparent switching procedures, and proportionate contract termination conditions, in accordance with Telecom Law No. 431 and applicable consumer protection rules.

### **1.5. Accountability and outcome monitoring**

The TRA shall monitor sector outcomes related to service continuity, consumer protection, access, affordability, and quality, and shall report on these outcomes through a consolidated monitoring and evaluation framework. Detailed performance indicators, benchmarks, and reporting mechanisms shall be defined under the Policy's implementation and monitoring provisions.

### **1.6. Personal Data Protection and Privacy Compliance**

The TRA shall ensure that all licensed operators comply with Law No. 81/2018 on Electronic Transactions and Personal Data Protection and its implementing regulations, including lawful and transparent data processing, data minimization and purpose limitation, prohibition of unauthorized use or monetization of consumer data, appropriate data-governance and security measures, and protection of consumer rights. Telecommunications policy and regulation shall ensure coherent governance of data protection, privacy, data retention, lawful access, auditability, and transparency, consistent with applicable legislation, national security requirements, and due-process safeguards. The TRA shall define and enforce these obligations through regulatory and licensing instruments, without duplicating existing statutory frameworks, and such obligations shall be subject to audit, inspection, and enforcement in accordance with applicable law.

### **1.7. Consumer Awareness and Transparency**

The TRA shall require all licensed telecommunications service providers to implement mandatory consumer awareness campaigns on users' rights, service conditions, pricing transparency, and available complaint and dispute-resolution procedures. Such campaigns shall be conducted through accessible and appropriate channels, including digital platforms and customer interfaces, and shall be subject to regulatory guidance, monitoring, and enforcement to ensure consistency, accuracy, and effective consumer outreach.

### **1.8. Quality of Services monitoring**

The TRA shall establish or designate a dedicated quality-of-service monitoring function to regularly assess, measure, and verify compliance with defined service-quality standards across telecommunications networks and services. This function shall apply objective performance indicators, conduct periodic audits and testing, and support enforcement actions to ensure continuous compliance, transparency, and accountability by all licensed operators.

DRAFT

## 2) Pillar 2 — Rule of Law Restoration and Market Normalization

### Objective

Restore legality, technical order, and equal treatment across the telecommunications market through a transparent and proportionate transition, without legitimizing unlawful activity or disrupting essential services.

### Policy Directions and Mandates

#### 2.1. Orderly transition toward lawful market structures

The TRA is called to restore full regulatory oversight in a market characterized by prolonged regulatory gaps, informal service provision, and inconsistent technical practices. The transition toward lawful market structures shall be orderly, transparent, and proportionate, ensuring service continuity for citizens, businesses, and critical public services while progressively re-establishing compliance with applicable laws and regulations.

#### 2.2. Restoration of equality before the law

All market participants shall be subject to the same legal and regulatory obligations, without discrimination. Transitional measures shall not constitute legalization or permanent grandfathering of unlawful activities. Compliance pathways shall be time-bound and conditional, and shall not confer enduring competitive advantage or immunity from enforcement.

#### 2.3. Sequenced and risk-based enforcement

The TRA shall apply enforcement in a sequenced and risk-based manner, prioritizing actions that address the most harmful practices, including those that endanger network integrity, consumer interests, public safety, or fair competition. Enforcement shall be calibrated to avoid disproportionate disruption while ensuring that regulatory authority is effectively restored. Without prejudice to confidentiality and due process, the TRA should promote transparency in enforcement by publishing aggregated or anonymized information on regulatory actions and compliance outcomes.

#### 2.4. Governance safeguards and regulatory integrity

The TRA shall apply strong governance and integrity safeguards in the exercise of its powers, including conflict-of-interest rules, internal separation measures, and documented, reasoned decision-making. Regulatory decisions shall be objective, reviewable, and consistent with the principles of transparency, equality, and non-discrimination.

#### 2.5. Structured consultation without obstruction

Public consultation shall inform regulatory design and transition measures through transparent and inclusive processes. Consultations shall be conducted within defined scopes and timelines and shall not be used to delay enforcement, compromise reform objectives, or entrench vested interests.

### 3) Pillar 3 — Institutional Architecture and Regulatory Independence

#### Objective

Establish a durable institutional architecture that clearly separates policy, regulation, and operations, and ensures the independence, credibility, and integrity of telecommunications regulation.

#### Policy Directions and Mandates

##### 3.1. Regulatory independence and authority

Regulatory independence shall be effective in practice as well as in law. The TRA shall exercise its statutory powers autonomously, free from political or commercial interference, and shall be empowered to take objective, reasoned, and enforceable decisions in accordance with applicable law. The Government shall respect and protect the TRA's independence in the exercise of its mandate. The phased implementation of this Policy is contingent upon the progressive institutional strengthening and financial independence of the TRA.

##### 3.2. Governance safeguards and integrity

The telecommunications sector shall be governed by transparent rules, competitive processes, and enforceable integrity safeguards. Regulatory decisions shall be reasoned, documented, and subject to lawful review. The TRA shall apply internal governance safeguards, including conflict-of-interest rules and ethical standards for staff and decision-makers, to preserve regulatory integrity and independence.

##### 3.3. Equal treatment and regulatory neutrality

All market participants—public and private—shall be subject to the same regulatory framework and enforcement standards. State ownership of telecommunications assets shall not confer preferential treatment or regulatory advantage, and regulation shall be applied on an objective, non-discriminatory basis.

##### 3.4. Policy discipline in market opening and state asset decisions

Decisions related to market liberalization, partnerships involving state-owned telecommunications assets, or private sector participation shall be guided by clear policy objectives, transparent processes, and respect for the institutional separation of roles. Regulatory and policy functions shall not be conflated with commercial decision-making, and reform processes shall be insulated from ad hoc or discretionary intervention.

### 4) Pillar 4 — Licensing and Market Entry

#### Objective

Establish a predictable, technology-neutral, and non-discriminatory licensing framework that enables market entry, convergence, and competition, while providing regulatory certainty for investment and innovation.

## **Policy Directions and Mandates**

### **4.1. Universal and converged licensing framework**

The TRA is called to establish and regulate a transparent, objective, and technology-neutral licensing framework based on Universal Telecommunications Licenses. This framework shall enable the provision of converged fixed, mobile, broadband, and digital services, in accordance with this Policy and Telecom Law No. 431. Licensing frameworks shall clearly define rights, obligations, and scope of authorized services, and shall be applied consistently to all eligible operators on an equal and non-discriminatory basis.

### **4.2. Predictable and fair market entry**

Market entry and authorization regimes shall be organized, transparent, and proportionate, encouraging participation across the telecommunications value chain while safeguarding fair competition and sector stability. Licensing decisions shall be reasoned, documented, and subject to lawful review, providing legal certainty and investor confidence.

Public consultation may be used to inform licensing frameworks, provided that consultations are conducted within defined scopes and timelines and do not delay market opening or regulatory enforcement.

### **4.3. Competitive neutrality and equal treatment**

All licensed operators, including state-owned and privately owned entities, shall be subject to the same licensing principles, regulatory obligations, and market-entry conditions. State ownership shall not confer preferential access, regulatory advantage, or exemption from licensing requirements.

### **4.4. Transitional licensing and orderly migration**

Where necessary to preserve service continuity and sector stability, the TRA may apply transitional or interim licensing arrangements to enable orderly migration toward full compliance with the licensing framework. Transitional arrangements shall be time-bound, conditional, and shall not prejudice the principles of competition, equal treatment, or the long-term liberalized market structure.

### **4.5. Licensing integrity and governance safeguards**

The licensing framework shall incorporate governance and integrity safeguards to prevent regulatory capture, conflicts of interest, and discretionary decision-making. Licensing criteria and procedures shall be objective, transparent, and applied consistently, in accordance with the principles of proportionality, transparency, and non-discrimination.

### **4.6. Licensing Fees**

Licensing frameworks should be periodically reviewed to ensure proportionality, market relevance, and consistency with sector development objectives, in coordination with relevant public authorities where fiscal implications arise.

### **4.7 Licensing clarity and legal certainty for private-sector participation**

Licensing rules and terms applicable to private-sector participation shall be clearly defined, publicly available, and applied in a predictable and non-discriminatory manner

to reduce regulatory uncertainty and support long-term investment. License scope, duration, fees, and key obligations shall be specified in advance, and any changes shall be proportionate, justified, and subject to appropriate transition arrangements, in accordance with Telecom Law No. 431.

#### **4.8 New legislations and amendments to law No. 431/2002**

The Ministry of Telecommunications should seek the enactment of new legislation, or targeted amendments to Law No. 431/2002, to establish a clear legal framework for regulating telecommunications services not adequately covered by the current law. This includes enabling a Universal License framework with modular authorization scopes—such as mobile access, fixed and mobile broadband, wholesale transport, international capacity, and eligible digital services—and establishing MVNO, Virtual ISP, and VNO regimes to support service-based competition and orderly reseller integration.

### **5) Pillar 5 — Infrastructure Deployment, Right-of-Way, and Open Access**

#### **Objective**

Enable rapid, cost-effective, and coordinated deployment of telecommunications infrastructure nationwide by establishing predictable rights-of-way, promoting infrastructure sharing, and ensuring open and non-discriminatory access to essential facilities.

#### **Policy Directions and Mandates**

##### **5.1. Right-of-Way as a national enabler**

The deployment of telecommunications and digital infrastructure is recognized as a matter of national interest. The TRA shall establish a clear, transparent, and non-discriminatory Right-of-Way (RoW) framework enabling timely access to public and, where legally permitted, private land for the deployment, operation, and maintenance of telecommunications infrastructure.

The RoW framework shall define who is authorized to install infrastructure, where and under what procedures, within what timelines, at what cost, and under whose authority, while safeguarding public safety, environmental standards, and property rights. It shall promote coordination with public authorities, infrastructure sharing, and predictable permitting, and include dispute-resolution mechanisms to prevent undue delays and discriminatory practices.

##### **5.2. Open access and infrastructure sharing as default regulatory expectation**

The policy urges the TRA to put in place the regulations of Tower Co. license and infrastructure sharing with applications especially for mobile service providers, Liban Telecom and telecom and wireless service providers for all sectors. Open access to essential passive infrastructure shall be the default regulatory expectation across fixed, mobile, and in-building networks. Infrastructure sharing shall be promoted to reduce duplication, lower deployment costs, lower energy consumption, accelerate coverage, and support sustainable competition, particularly where infrastructure constitutes an essential facility or benefits from public assets.

### **5.3. Neutral hosting and structural infrastructure sharing**

Where efficient and in the public interest, the aggregation and neutral management of passive telecommunications infrastructure—including towers, sites, ducts, poles, and associated facilities—shall be supported under transparent and non-discriminatory access conditions. Such arrangements shall be subject to regulatory oversight to ensure equal treatment, competitive neutrality, and the prevention of foreclosure or anti-competitive conduct.

### **5.4. Coordinated civil works and national deployment coherence**

Telecommunications infrastructure deployment shall be coordinated with national infrastructure planning and major public works to maximize efficiency and minimize disruption. Policy direction shall support coordinated civil works, avoidance of unnecessary duplication, and systematic integration of digital infrastructure into broader transport, energy, water, and urban development projects.

### **5.5. Transparency, standards, and infrastructure visibility**

The TRA shall ensure that infrastructure deployment and access frameworks are supported by appropriate transparency measures, technical standards, and information-sharing mechanisms. These shall enable efficient network planning, facilitate infrastructure sharing, reduce disputes, and support long-term sector resilience, while safeguarding legitimate confidentiality and security concerns.

### **5.6. Public-private partnerships for cost-sharing projects**

The TRA shall adopt public-private partnerships (PPPs) as a strategic mechanism to share investment risks and costs associated with large-scale telecommunications and digital infrastructure projects. PPP frameworks shall be designed to leverage private-sector expertise, financing capacity, and operational efficiency, while safeguarding public interest, service continuity, and long-term affordability. Such partnerships may be applied to passive infrastructure, international connectivity, data centers, energy resilience, and other capital-intensive assets, subject to transparent procurement processes, clear performance obligations, and appropriate regulatory oversight.

### **5.7. Gigabit-ready connectivity as a foundation for the digital backbone**

the development of telecommunications infrastructure in Lebanon shall progressively align with the objective of gigabit-ready connectivity. Infrastructure deployed across the sector shall be capable of supporting gigabit-level broadband services, primarily through fiber-based networks or equivalent high-capacity technologies, ensuring scalability to meet growing data demand and emerging digital applications.

### **5.8. FTTH as a national priority**

The Policy designates nationwide Fiber-to-the-Home (FTTH) deployment and backbone network modernization as a clear national priority. The TRA shall support this objective through coordinated regulatory measures, policy facilitation, and appropriate investment frameworks to expand high-capacity connectivity across all regions of the country. Fixed Wireless Access (FWA) should be deployed in areas where FTTH rollout is not technically or economically feasible, ensuring that underserved or hard-to-reach locations are not excluded from broadband access.

## 6) Pillar 6 — Competition and Economic Regulation

### Objective

Ensure effective and sustainable competition across telecommunications markets through transparent, proportionate, and predictable economic regulation that protects consumers, incentivizes investment, and prevents abuse of market power.

### Policy Directions and Mandates

#### 6.1. Competitive market structure and neutrality

Telecommunications markets shall be structured and regulated to promote effective competition across infrastructure, wholesale, and retail layers. The TRA shall apply competition rules in a manner that ensures competitive neutrality, including equal treatment of state-owned and privately owned operators, and prevents regulatory or ownership-based advantages.

#### 6.2. Market power assessment and proportionate remedies

Where market power exists, regulatory intervention shall be based on objective market analysis and applied in a proportionate and targeted manner. Remedies shall be designed to address identified competition concerns while preserving incentives for efficient investment, innovation, and network modernization.

#### 6.3. Wholesale access and essential facilities

Access to essential facilities and wholesale inputs shall be governed by principles of fairness, transparency, and non-discrimination where such access is necessary to sustain competition or prevent foreclosure. Economic regulation shall aim to enable downstream competition without discouraging infrastructure investment or efficient risk-taking.

#### 6.4. Tariffs, pricing, and interconnection principles

Tariffs, interconnection arrangements, and wholesale pricing frameworks shall be economically sound, transparent, and aligned with cost-orientation and international best practices, while taking into account national economic conditions. Regulatory intervention in pricing shall be proportionate, evidence-based, and limited to circumstances where competitive outcomes cannot be achieved through market forces alone.

#### 6.5. Predictability, transparency, and dispute resolution

Economic regulation shall be implemented through clear, published rules and reasoned decisions that provide predictability to market participants. Effective mechanisms shall be in place to resolve commercial and regulatory disputes in a timely and impartial manner, supporting market confidence and continuity of service.

#### 6.6. Dispute Resolution

Regulatory and commercial disputes should be resolved through timely, impartial, and efficient procedures, including fast-track mechanisms where appropriate, without prejudice to judicial review.

### **6.7. Tiered and Socially Targeted Pricing for Affordability**

The TRA shall promote the introduction of tiered and flexible pricing structures, including socially targeted offers for low-income users, to improve affordability and user choice while preserving commercial sustainability. Such pricing frameworks may allow operators to differentiate services based on usage levels, service characteristics, or value propositions, provided they are transparent, non-discriminatory, and consistent with consumer protection and competition principles.

## **7) Pillar 7 — Mobile Networks, Spectrum, and Access Technologies**

### **Objective**

Ensure efficient, resilient, and future-ready mobile and wireless connectivity through transparent spectrum management and technology-neutral access frameworks that support nationwide coverage, service quality, and innovation.

### **Policy Directions and Mandates**

#### **7.1. Spectrum as a national public resource**

Radio spectrum shall be managed as a scarce national resource in the public interest. The TRA shall ensure that spectrum assignment, renewal, and refarming are conducted transparently and objectively, in a manner that promotes efficient use, expanded coverage, improved service quality, and effective competition, while safeguarding national security and public safety. Spectrum management shall include periodic reviews of spectrum utilization, refarming where technically and economically justified, and preparedness for technological evolution. To support long-term efficiency, the TRA shall embed spectrum refarming tools and incentives for migration toward fiber-based networks within its regulatory instruments.

#### **7.2. Stable and future-oriented mobile licensing**

Mobile network operations shall be governed by stable, predictable licensing frameworks that support long-term investment, network modernization, and service continuity. Licensing arrangements shall enable the progressive evolution of mobile networks toward advanced technologies (cloud, fintech, IoT...), while preserving regulatory certainty and equal treatment among operators.

#### **7.3. Technology-neutral access and complementary solutions**

Access technologies—including mobile broadband, fixed wireless access, satellite connectivity, and other emerging platforms—shall be enabled under technology-neutral regulatory frameworks. Complementary access solutions may be used to extend coverage, improve resilience, and address underserved areas, provided they are consistent with spectrum policy, service quality standards, and overall market stability.

#### **7.4. Coverage, quality, and network resilience**

Spectrum and mobile regulatory frameworks shall support nationwide coverage, measurable quality of service, and network resilience. Regulatory expectations shall encourage redundancy, continuity of service, and preparedness for emergencies, while avoiding obligations that undermine investment incentives or operational sustainability. Telecommunications service providers shall be incentivized, through appropriate

regulatory and policy mechanisms, to extend coverage to underserved, rural, and remote areas.

#### **7.5. Innovation, efficiency, and sustainable use**

Spectrum management and mobile regulation shall promote efficient spectrum use, network sharing where appropriate, and innovation in network deployment and operation. Regulatory approaches shall balance flexibility with discipline, enabling new use cases and services while preserving fair competition and long-term sector performance.

#### **7.6. Corporatization, Privatization, and Sustainable Public Revenue**

Following the restoration of order, market normalization, and sector stability, and subject to decisions of the Council of Ministers, the TRA shall advance the corporatization of state-owned telecommunications assets under transparent commercial governance as a step toward partial or full privatization. Such processes shall preserve effective competition, attract long-term strategic investors, and ensure continued public value. All licensed operators and service providers shall contribute to a transparent, predictable, and non-discriminatory revenue-sharing framework in favor of the State, in accordance with applicable law. No privatization shall proceed without a sovereign decision of the Council of Ministers following transparent valuation and public-interest assessment.

#### **7.7. Transparent and lawful licensing and spectrum authorization frameworks**

The Policy acknowledges the proliferation of unauthorized FWA deployments operating outside licensed spectrum parameters or lawful service frameworks. Such practices undermine spectrum integrity, distort competition, degrade service quality, and expose consumers and critical services to interference and security risks. The TRA is called to ensure that all FWA deployments operate under transparent and lawful licensing and spectrum authorization frameworks, supported by time-bound transition mechanisms that preserve service continuity without legitimizing unauthorized spectrum use, or by defining concrete licensing pathways (cluster licensing, ISP exceptions) to operationalize integration while preserving rule of law and service continuity.

## **8) Pillar 8 — Resilience, Security, and Digital Hub Enablement**

### **Objective**

Strengthen the resilience, security, and future readiness of Lebanon's telecommunications sector so that digital connectivity reliably supports national security, economic stability, public services, and long-term digital transformation.

### **Policy Directions and Mandates**

#### **8.1. Network resilience and service continuity**

Telecommunications networks shall be designed, operated, and regulated to ensure high levels of availability, redundancy, and continuity of service. Regulatory frameworks shall promote resilience against physical, technical, and operational risks—including natural hazards, infrastructure failures, and external shocks—in order to safeguard public safety

and the continuity of critical services. The TRA shall establish baseline, outcome-based, and proportionate requirements for network resilience, redundancy, and disaster-recovery preparedness applicable to critical telecommunications networks and services.

### **8.2. Cybersecurity and protection of digital infrastructure**

The telecommunications sector shall operate under a coherent and robust cybersecurity framework designed to protect networks, systems, and data against evolving cyber threats. The TRA shall establish and enforce a sector-specific cybersecurity framework applicable to all telecommunications operators, aligned with national cybersecurity authorities and informed by relevant international best practices.

### **8.3. Digital sovereignty and trusted connectivity**

Policy and regulation shall support sovereign options for critical digital workloads, trusted data handling, and secure national connectivity. This includes promoting diversified and resilient international connectivity, safeguarding strategic infrastructure, and ensuring that national interests are protected in cross-border digital interconnections.

### **8.4. Readiness for digital services and emerging uses**

The telecommunications sector shall be prepared to support advanced digital services and emerging use cases, including cloud services, fintech, data-driven applications, the Internet of Things, and digital public services. Regulatory frameworks shall enable innovation and scalability while ensuring security, interoperability, and consumer trust.

### **8.5. Coordination and preparedness for national digital transformation**

Telecommunications policy shall be aligned with broader national digital transformation objectives. Regulatory and institutional coordination shall ensure that connectivity infrastructure supports e-government, education, health, financial inclusion, and other public-interest digital initiatives, while maintaining sector resilience and operational integrity.

### **8.6. Cybersecurity obligations on service providers**

Licensed telecommunications operators shall be subject to graduated and proportionate cybersecurity obligations, determined by the TRA based on the scale of operations, criticality of services, and potential impact on national infrastructure and public interest. At policy level, such obligations shall include requirements relating to incident detection and reporting, operational security monitoring, supply-chain risk management, and protection of critical network infrastructure, without prejudice to the TRA's authority to define detailed regulatory and licensing conditions.

### **8.7. Digital Infrastructure Governance and Legal Framework Modernization**

The Policy recognizes that Telecom Law No. 431 does not provide an adequate legal basis for the governance of emerging digital infrastructure components, including data centers, Internet exchange points (IXPs), cloud interconnection facilities, cross-border digital connectivity, and related cybersecurity and data-governance functions. These elements are critical to Lebanon's digital development and regional connectivity ambitions, yet fall outside the current statutory mandate of the TRA.

Accordingly, the Government recommends the introduction of a dedicated **Digital Infrastructure chapter** within Telecom Law No. 431, or through complementary legislation, to define the legal status, scope, and governance principles applicable to neutral data centers, IXPs, cloud interconnects, and cross-border digital services. This chapter shall clarify the respective roles of the TRA and other competent authorities.

DRAFT

## 7. Transitional and Reform Approach

### Policy Stance (Non-Negotiable)

- **Service continuity first:** avoid widespread interruption of connectivity except where there is an immediate threat to national security, public safety, or critical services.
- **Restore rule of law through a time-bound pathway:** registration and regularization precede full enforcement, and transitional measures are not permanent.
- **Target the most harmful violations first:** harmful interference, unsafe installations, fraud, abuse of dominance, and practices that endanger consumers.
- **Equal treatment and transparency:** no selective enforcement, no favoritism, and no special-interest arrangements; decisions must be objective and reasoned.
- **Orderly inclusion:** avoid arbitrary displacement of established providers acting in good faith; provide a clear path to lawful authorization or licensing, with enforceable consumer protection and service continuity obligations during the transition.
- **Protection of critical users:** Connectivity for hospitals, schools, government services, emergency communications, and other critical users shall be safeguarded throughout the transition and reform process.
- **Curtailment of illegal ISP networks:** progressively eliminate unauthorized networks through coordinated registration, compliance, and enforcement actions, ensuring alignment with licensing, spectrum, and safety requirements.
- **Transparent transition framework:** A publicly communicated, time-bound pathway shall be established for the registration, regularization, or orderly exit of informal providers, consistent with applicable licensing, safety, and consumer-protection requirements.

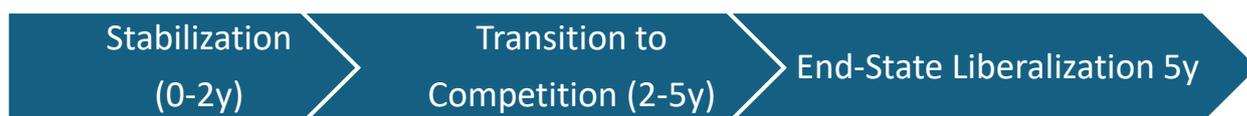
## 8. Phased Sector Liberalization Program

The Government of Lebanon affirms that telecommunications reform has a clear and irreversible destination: a fully liberalized market governed by Telecom Law No. 431/2002, supported by an independent regulator, effective competition, and a State that sets policy, safeguards the public interest, and exercises ownership oversight rather than directly operating commercial networks.

At the same time, Lebanese citizens and businesses cannot wait for long-term reform outcomes to access reliable connectivity. Reform must therefore proceed in parallel with immediate stabilization measures that protect service continuity, strengthen consumer protection, and restore confidence in the sector. The transition toward full liberalization shall be time-bound, sequenced, and firmly anchored in the rule of law.

To achieve this, the Government adopts a phased sector liberalization program structured around three successive stages:

DRAFT



Period	Focus	Key Actions
0-2 years	Stabilization	<ul style="list-style-type: none"> <li>Stabilize services and protect the public interest in the short term.</li> <li>Restore institutional and regulatory capacity across the sector.</li> <li>Re-establish and empower the TRA.</li> <li>Enforce service continuity and core consumer-protection obligations.</li> <li>Implement mobile management partnerships.</li> <li>Launch sector regularization and normalization processes. Refarm spectrum and normalize fiber.</li> <li>Establish and operationalize Liban Telecom.</li> <li>Advance spectrum modernization and 5G readiness initiatives.</li> </ul>
2-5 years	Transition to Competition	<ul style="list-style-type: none"> <li>Restore the rule of law and effective regulation through an orderly, time-bound transition toward competition.</li> <li>Implement strategic partnerships to modernize networks.</li> <li>Introduce open-access and wholesale access frameworks.</li> <li>Publish a sector investment and tariff roadmap.</li> <li>Adopt baseline resilience requirements and Significant Market Power (SMP) remedies.</li> <li>Implement tariff and wholesale pricing reforms.</li> <li>Prepare state-owned telecommunications assets for potential privatization.</li> </ul>
5 years and beyond	End-State Liberalization	<ul style="list-style-type: none"> <li>Achieve full market opening and mature, sustainable competition.</li> <li>Implement partial or full privatization of state-owned telecommunications assets, subject to decisions of the Council of Ministers.</li> <li>Sustain innovation and long-term investment across the sector.</li> <li>Deepen regional integration and cross-border connectivity.</li> <li>Develop a resilient digital and connectivity hub ecosystem.</li> <li>Focus regulatory oversight on outcomes, universal service, consumer trust, and long-term sector sustainability.</li> </ul>

The indicative benchmarks set out under the Phased Sector Liberalization Program are policy reference points intended to guide sequencing and assessment of progress. They do not constitute advance licensing commitments or derogate from the powers of the Council of Ministers or the TRA.

The Phased Sector Liberalization Program shall be consistent with, and take into full consideration, the mandate assigned to the TRA in the onboarding letter dated **6 October 2025**, as summarized in the table below.

DRAFT

## Unified Priorities – First Six Months

## Strategic Outlook (Next 18 Months)

<ul style="list-style-type: none"> <li>a) Spectrum Reform &amp; 5G Readiness</li> <li>b) Financial &amp; Institutional Independence</li> <li>c) Interim Licensing Framework</li> <li>d) Integration of Unlicensed Networks</li> <li>e) Infrastructure Sharing &amp; Rights of Way</li> <li>f) Tariff &amp; Interconnection Reform</li> <li>g) Consumer Protection &amp; Service Quality</li> <li>h) National Numbering Plan (NNP) Update</li> <li>i) Universal License for Liban Telecom</li> <li>j) Enforcement &amp; Inspection Framework</li> <li>k) Transitional Coordination with the Ministry</li> <li>l) Procedures for submitting and reviewing licenses</li> <li>m) 2026 Budget Revision</li> </ul>	<ul style="list-style-type: none"> <li>• Finalize a market -regulation model to guide sector structure, competition policy, and private -sector participation.</li> <li>• Expand broadband penetration through fiber, fixed -wireless, and satellite.</li> <li>• Oversee Liban Telecom’s modernization and support its long-term privatization roadmap.</li> <li>• Extend oversight into emerging digital -economy domains —data, cloud, fintech, IoT, and cybersecurity —ensuring coherence with national digital transformation objectives.</li> </ul>
--	--

DRAFT

## 9. Cross-Government Coordination

The Ministry calls for coordinated action with the Ministry of State for IT and AI Ministry of Energy and Water, the Electricity Regulatory Authority, the Ministry of Public Works and Transport, the Ministry of Interior and Municipalities, the Ministry of Finance, and other relevant public authorities.

This coordination shall aim to:

- Embed telecommunications infrastructure systematically into national and municipal public works, utilities, and transport projects, including roads, electricity, water, wastewater, and urban development works;
- Align planning, permitting, and execution processes to reduce deployment time, cost, and duplication;
- Apply a national “dig-once” and shared-infrastructure approach across public projects;
- Facilitate streamlined access to public land, rights-of-way, and public facilities for digital infrastructure deployment;
- Ensure consistency between telecommunications, energy, transport, and urban infrastructure planning;
- Support accelerated rollout of fiber, mobile, and related digital infrastructure nationwide, while ensuring safety, quality, and accountability.
- Coordination mechanisms established under this Policy shall support planning alignment and implementation efficiency and shall not replace or override statutory authorities or approval processes.

## 10. Implementation, Monitoring, and Review

To strengthen transparency and accountability, the Ministry mandates the TRA to publish an annual public report on sector performance, summarizing key regulatory and enforcement actions, progress against defined KPIs, and stakeholder consultations.

The TRA shall also establish and publish a comprehensive KPI framework covering coverage, affordability, service quality, competition, and infrastructure readiness. Reporting must provide a clear assessment of service continuity, consumer protection, market normalization, infrastructure resilience, and institutional effectiveness, reflecting prevailing economic, fiscal, and energy conditions to ensure a realistic evaluation of progress.

The KPI framework should include, at a minimum:

- Household broadband availability and geographic coverage;
- Adoption rates and affordability indicators, including price-to-income metrics;
- Average and peak access speeds, with transparency on advertised versus delivered performance;
- Network reliability and resilience indicators, including outage frequency and restoration times;
- Customer complaint volumes, resolution timelines, and dispute-resolution outcomes;
- Market concentration metrics and wholesale access effectiveness;
- Progress toward Gigabit-ready infrastructure and high-capacity network deployment.

Sector KPIs shall be published regularly and assessed in light of prevailing economic, energy, and fiscal conditions. They shall be reviewed to ensure continued alignment with the public interest, universal service objectives, and the long-term policy vision, and made publicly accessible where feasible to strengthen accountability.

The Ministry of Telecommunications shall periodically review and update this Policy.

## 11. What This Policy Does Not Do

This Policy does **not**:

- Set retail prices;
- Grant licenses;
- Select operators;
- Manage networks or assets;
- Replace the regulator.

Any departure from these institutional boundaries would undermine regulatory credibility and sector stability.

## 12. Final Policy Statement

This Policy Framework restores institutional order, sets a clear reform trajectory, and places the public interest at the center of Lebanon’s telecommunications sector.

The Ministry of Telecommunications expects the TRA to implement this Policy independently, objectively, and without discrimination, so that connectivity becomes a driver of recovery, trust, and long-term national prosperity.

The Ministry of Telecommunications commits to supporting the TRA through appropriate legal protection, institutional backing, and resource planning, so that it may discharge its mandate independently, professionally, and in the public interest.

DRAFT

## 13. Annex A — Selected International Benchmarks Informing This Policy

The following international practices illustrate regulatory tools and policy approaches consistent with the objectives of this Policy Framework. They are included for reference and benchmarking purposes only and do not constitute direct legal sources or prescriptive models for Lebanon. International examples cited herein are intended to inform policy design rather than to be replicated wholesale.

Regulatory approaches adopted under this Policy shall be adapted to Lebanon’s specific legal, institutional, economic, and social context. This includes the use of transitional measures, proportionate and sequenced enforcement, and clearly defined timelines to restore order, protect consumers, and support sustainable market development. Particular attention is given to lessons drawn from countries that have faced similar structural, fiscal, or institutional challenges.

### Europe

- EU-wide targets aim for universal Gigabit and 5G connectivity, reflecting a ‘gigabit-ready’ infrastructure ambition.
- Regulatory frameworks emphasize universal service, consumer protection, and competition through market analysis and proportionate remedies.
- Recent European initiatives emphasize streamlined permitting, access to physical infrastructure, and in-building access to support rapid fiber deployment.

### GCC / Middle East

- Saudi Arabia: open access initiatives support competition by allowing consumers to choose providers independent of infrastructure ownership.
- UAE: rules recognize high-speed broadband via multi-operator networks as a necessity and support universal access without geographic discrimination.
- Qatar: initiatives promote fair and open access to essential government telecom infrastructure to reduce duplication and accelerate FTTH and 5G deployment.
- Bahrain: wholesale fiber through a national network operator with equivalence-of-input access models; dominance determinations provide the basis for regulatory obligations.
- Oman: national broadband strategy objectives include high-speed affordable broadband for residents, world-class broadband for businesses, and rural connectivity.

### International Telecommunication Union (ITU) guidance

ITU and partners emphasize the importance of ubiquitous, affordable high-speed broadband, protection of citizens’ rights online, and cross-sector cooperation as digital technologies converge.

### GSMA and Industry Policy Benchmarks

- GSMA policy guidance emphasizes transparent and timely spectrum assignment, technology neutrality, and license conditions that support investment, quality, and coverage.

- GSMA best-practice positions support regulatory frameworks that promote consumer trust (privacy, fraud prevention, and transparency), efficient infrastructure deployment, and competitive wholesale access where bottlenecks exist.

### WTO / GATS Reference Paper Regulatory Principles

International principles reflected in the WTO Basic Telecommunications Reference Paper include competition safeguards, interconnection guarantees, transparent licensing, independence of regulators, fair allocation of scarce resources, and universal service policies (as benchmarks only).

## 14. Annex B — Reference Sources (for convenience)

- Lebanon Telecom Law No. 431 (English translation via Cyrilla): <https://cyrilla.org/en/document/ir7k66ehm2wq4f6cbbh56l0d2c>
- EU Electronic Communications Code – overview: <https://digital-strategy.ec.europa.eu/en/policies/electronic-communications-code>
- Council of the EU: ‘Path to the Digital Decade’ targets (incl. gigabit/5G connectivity): <https://www.consilium.europa.eu/en/policies/path-to-the-digital-decade-the-eu-s-plan-to-achieve-a-digital-europe-by-2030/>
- BEREC: Guidelines on criteria for Very High Capacity Networks (VHCN): <https://www.berec.europa.eu/en/document-categories/berec-guidelines-reports-and-other-documents/berec-guidelines-on-the-criteria-for-a-very-high-capacity-network>
- BEREC: Guidelines on access to in-building physical infrastructure (Gigabit Infrastructure Act): <https://www.berec.europa.eu/en/document-categories/berec-guidelines-reports-and-other-documents/berec-guidelines-on-access-to-in-building-physical-infrastructure>
- Ofcom (UK): Broadband universal service / right to request decent broadband: <https://www.ofcom.org.uk/phones-and-broadband/access-to-decent-broadband/broadband-uso-need-to-know>
- Saudi CST: Open Access initiative: <https://www.cst.gov.sa/en/consumer/quality/Pages/open-access.aspx>
- UAE TDRA: Access to private lands regulations (multi-operator broadband): <https://tdra.gov.ae/-/media/About/regulations-and-ruling/EN/Access-to-private-lands-pdf.ashx>
- Qatar CRA: Access to government telecom infrastructure (duct access press release): <https://www.cra.gov.qa/en/press-releases/cra-opens-access-to-over-4860-km-of-government-telecom-infrastructure-across-qatar>
- Qatar CRA: Consumer protection policy: <https://www.cra.gov.qa/en/document/consumer-protection-policy>
- Kuwait CITRA: Consumers’ rights and obligations: [https://www.citra.gov.kw/en/consumer/rights\\_obligations](https://www.citra.gov.kw/en/consumer/rights_obligations)
- Bahrain TRA (document portal): BNET wholesale fiber equivalence of input (PDF): [https://tra-website-prod-01.s3-me-south-1.amazonaws.com/Media/Documents/docs/20240331144031874\\_xun1g2et\\_sht.pdf](https://tra-website-prod-01.s3-me-south-1.amazonaws.com/Media/Documents/docs/20240331144031874_xun1g2et_sht.pdf)

- Bahrain TRA: Dominance determination (BNET) (PDF): [https://tra-website-prod-01.s3-me-south-1.amazonaws.com/Media/Documents/docs/20210106135539412\\_nvaoeesx\\_iva.pdf](https://tra-website-prod-01.s3-me-south-1.amazonaws.com/Media/Documents/docs/20210106135539412_nvaoeesx_iva.pdf)
- ITU (World Bank & ITU): Digital Regulation Handbook (3rd edition): [https://www.itu.int/dms\\_pub/itu-d/opb/pref/D-PREF-TRH.1-2020-PDF-E.pdf](https://www.itu.int/dms_pub/itu-d/opb/pref/D-PREF-TRH.1-2020-PDF-E.pdf)
- ITU: Competition and regulation in a converged broadband world: <https://www.itu.int/ITU-D/treg/publications/Competitionregulation.pdf>
- ITU: Collaborative digital regulation country review (Oman): [https://www.itu.int/dms\\_pub/itu-d/opb/pref/D-PREF-THEM.36-2025-PDF-E.pdf](https://www.itu.int/dms_pub/itu-d/opb/pref/D-PREF-THEM.36-2025-PDF-E.pdf)
- GSMA: Policy and Regulation resources: <https://www.gsma.com/solutions-and-impact/connectivity-for-good/public-policy/>
- GSMA: Spectrum Management and Licensing handbook: <https://www.gsma.com/solutions-and-impact/connectivity-for-good/public-policy/handbook/spectrum-management-and-licensing/>
- GSMA: Mobile Policy Handbook: <https://www.gsma.com/solutions-and-impact/connectivity-for-good/public-policy/mobile-policy-handbook/>
- WTO (benchmarks): GATS Annex on Telecommunications and Basic Telecommunications Reference Paper (overview): <https://estore.carecinstitute.org/wp-content/uploads/2023/01/recommended-tuthill-NewRulesForRegulators.pdf>