

Before the
DEPARTMENT OF COMMERCE
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION

In the Matter of)
) Docket No. 160509408-6408-01
Input on Proposals and Positions for 2016 World) RIN 0660-XC026
Telecommunication Standardization Assembly)

COMMENTS OF VERIZON

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I. Introduction

Verizon welcomes the opportunity to comment on the National Telecommunications and Information Administration's (NTIA) Request for Comment on proposals and positions for the International Telecommunication Union's (ITU) upcoming 2016 World Telecommunication Standardization Assembly (WTSA-16). Verizon encourages the continued engagement of NTIA and the U.S. Government in this process and proposes a framework that will promote innovation and investment in the global digital economy.

II. Background

The 2016 meeting of WTSA will set both the ITU Telecommunication Standardization (ITU-T) Sector's work program and leadership structure for the next four years, and determine in large part how, and under what circumstances, industry participates in the standardization work of ITU-T. NTIA and the U.S. Government should remain engaged and develop a strategy to ensure that reforms in the ITU-T and other outcomes at WTSA-16 promote innovation and investment in the global digital economy.

Verizon has participated in the work of ITU-T for over twenty years, both as a member of various U.S. delegations and independently as Member of the Standardization and other Sectors of the Union. Our participation has ranged from detailed and highly-specialized technical work

to engagement on technology policy and financial topics spanning a number of diverse ITU-T study groups. Verizon consistently has encouraged the ITU-T to focus on its existing mandate, which is to formulate technical telecommunications Recommendations developed through a bottom-up transparent and consensus-based multi-stakeholder process.¹ Duplication of technical work underway in other fora such as industry-driven standards development organizations (SDOs), encroachment into commercial decisions, and expansion into regulatory policy are not part of the ITU-T's core responsibilities.

Despite the 2014 ITU Plenipotentiary Conference re-affirmation of the Union's existing scope, a troubling trend has emerged within the Sector: the ITU-T's steady increase in activities beyond its core set of responsibilities. This development is especially apparent and questionable in the work of study groups that increasingly generate Recommendations that could lead to regulation of over-the-top (OTT) applications, which – by extending into content – clearly exceed the ITU's mandate.² The ITU-T also is rushing to create Recommendations on the Internet of Things (IoT) and machine-to-machine communications—just when bottom-up, widely-attended SDOs are engaged in the same effort. Finally, to the extent the ITU-T intends to recommend standards on aspects of IP peering, or the charging, accounting, and settlement mechanisms for a range of offerings outside “telecommunication” services, this too is beyond the Standardization Sector's scope as established in the ITU Constitution.³

The ITU-T's increasing trend toward development of regulatory Recommendations beyond the scope of the ITU foundational documents undermines one of the primary objectives

¹ The technical standards produced by the ITU-T are referred to as “Recommendations,” as are regulatory policies suggested for matters such as telecommunications charging and tariffing. National governments often use these Recommendations as input for national laws.

² See ITU Res. 130 *resolves* 3.

³ See ITU Constitution (CS), Preamble, Art. 1, CS 1012.

of the ITU: to address the “standardization gap” between developed and developing countries through increased participation by developing countries in standardization activities and thereby narrowing the digital divide. Unless a strong, broad-based agreement is reached among all ITU-T participant groups at WTSAs-16 on the future work and priorities of the Sector, the outputs from the T-sector could actually exacerbate the “standardization gap.” Top-down, heavy-handed regulations, as suggested in past ITU-T Recommendations, will drive away much needed investments in network upgrades, as governments call for and implement ITU Recommendations on topics such as licensing, pricing and charging, universal service, quality of service, interconnection, interoperability, taxation, and consumer protection. Many such Recommendations would impose severe *ex-ante* requirements on service providers that would constrain the flexibility for commercial agreements and innovative services to meet the diverse needs of markets around the world.

To avoid such an outcome and to ensure that WTSAs-16 is a success, Verizon suggests the following set of principles for U.S. government consideration.

III. Suggested Core Principles for U.S. Government Participation and Decision-Making at WTSAs-16

A. A Bottom-Up, Consensus-Based and Transparent Work Program Is Essential

The ITU-T’s members should be steering the work and priorities of the Sector without undue interference or enablement from the Telecommunication Standardization Bureau (TSB): this is the nature of a “bottom up” governance model. Yet ITU staff too often impels work in certain directions and strongly influences its outcome. This pattern, in turn, distorts development of consensus among members, who often find themselves needing to counter or block unwanted and counterproductive outcomes rather than collaborating toward consensus on member-driven technical standards. If the ITU-T is to be successful, it must function – as much as possible

under its mandate⁴ – as a multi-stakeholder technical community. To do that, voluntary telecommunications Recommendations and standards must be approved through a well-understood and effective consensus-based process.

B. The Standards Approval Process Must Be Clear, Well-Understood, and Easily Accessible

Current processes for standards approval, particularly the regional study group process, are fraught with challenges to meaningful and inclusive participation: they must be reformed. For example, regional meetings must be more transparent, and open to participants from any other regions – the latter reform would maximize opportunities for knowledge-sharing. Outputs from regional groups must reach the parent study group in time to be considered thoroughly by all study group participants regardless of their own home regions. Further, when a regional contribution fails to achieve a robust consensus during parent study group discussions, it should be sent back to the regional group for further deliberation.

C. The ITU-T Should Focus on Its Core Technical Telecommunications Standardization Competencies and Avoid Duplication

The ITU-T should concentrate on its core competencies in global telecommunications standards and avoid replicating work being done in other standard-setting fora. A recent example of a major failure in this area was the creation of the new Study Group 20 (“SG 20”) to address IoT technologies and smart cities. Several Member States, including the United States, objected to the creation of this group because these issues are already under consideration in many other standards groups; these objections were ignored. SG 20 is now actively generating numerous and broad ranging draft Recommendations that could impact innovation and roll-out of services for nascent IoT technologies. Perhaps the most useful role for the ITU under similar circumstances would be to inform its members about the other fora where standards and public

⁴ See CS Article 17 and Convention (CV) Article 14.

policies relevant to IoT exist or are being developed, rather than duplicating existing and ongoing work.

The ITU, Member States, and Sector Members are all operating with limited financial resources, and the WTSAs-16 should encourage cost-effective and efficient study group structures. It should also reject calls to expand work programs unless a clear case can be made for the change, because unfunded and expanded work elements within the ITU-T exacerbate the problems described above and thus harm the Sector. Wasted and duplicative work within ITU-T only delays closing the standardization gap, while also depleting funds for capacity building.

D. The ITU-T Must Recognize Other Standards Setting Organizations and Avoid Expansion into Policymaking

The digitalization of life around the world has brought major changes in its wake. New, globally recognized players have emerged in the standards-generating business that are agile, open, and work quickly through a consensus-based processes. To carry out its core technical responsibilities effectively, the ITU must improve its outreach and coordination efforts with these groups and organizations. ITU should also establish mechanisms to require ITU-T study groups to consult with appropriate SDOs prior to beginning new work.

Additionally, digitalization has generated discussions of public policies for IP-based services and the digital economy that are poorly suited for consideration by traditional telecommunications processes and institutions. For example, to address challenges created by the nascent IoT technologies discussed above, established multi-stakeholder organizations cover Internet governance policies; industry practices and government institutions with appropriate expertise cover privacy and security policies; and generic (not telecommunication-specific) governmental frameworks cover policy issues that encompass telecommunications and other

players in the digital ecosystem. The ITU-T should thus not expect its standardization activities to be the source of policy and regulatory guidance in these areas.

IV. Conclusion

Verizon is committed to working with the U.S. Government and other stakeholders in preparing for WTSAs-16. The principles noted above set forth Verizon's priorities for the ITU-T for the next four years. These principles will enable the Telecommunication Sector to thrive under its existing mandate and core competencies and will promote the generation of standards through a multi-stakeholder process.

Respectfully submitted,

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