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June 16, 2016

Vernita D. Harris
Deputy Associate Administrator
Office of International Affairs
National Telecommunications and Information Administration
1401 Constitution Avenue NW, Room 4701
Washington, D.C. 20230

Re: ATIS' input on Proposals and Positions for 2016 World Telecommunication
Standardization Assembly

Dear Ms. Harris:

The Alliance for Telecommunications Industry Solutions (ATIS) is pleased to provide its input to the *Request For Public Comment (RFC)* released May 17, 2016, by the National Telecommunications and Information Administration (NTIA). In the *RFC*, NTIA seeks input on a number of issues pertaining to the work of the International Telecommunication Union (ITU), including the role and value of the ITU Telecommunication Standardization Sector (ITU-T). As explained more fully below, ATIS believes that the ITU-T has a role in the information and communications technology (ICT) ecosystem alongside other stakeholders but that the value of the ITU-T is diminished when it duplicates existing industry efforts and when it attempts to expand its activities beyond its established scope.

Background.

ATIS is a technology and solutions development organization that advances pressing business priorities, including cybersecurity, network evolution, big data analytics, emergency services, quality of service, billing support, and operations. ATIS members include key wireline and wireless service providers, equipment manufacturers, software developers, consumer electronics companies, and internet service providers.¹ These members collaborate on the development of consensus-based, voluntary standards that facilitate the development and deployment of new technologies and services and promote the reliability and seamless integration of such services on communications networks.

ATIS is accredited by the American National Standards Institute (ANSI). ATIS is the North American Organizational Partner for the 3rd Generation Partnership Project (3GPP), a founding Partner of the oneM2M global initiative, a member and U.S. contributor to the International Telecommunication Union (ITU), as well as a member of the Inter-American Telecommunication Commission (CITEL).

¹ A list of ATIS' members can be found on the ATIS website at: http://www.atis.org/01_membership/ourmem.asp

Comments.

In the *RFC*, NTIA seeks comment on ways in which cooperation and collaboration between the ITU-T and SDOs can be strengthened.² ATIS believes that international cooperation is vital and is a founding partner in many global collaborative efforts, including:

- 3GPP, the global initiative that develops LTE, LTE-Advanced, and 5G wireless specifications. The project unites seven of the world's leading SDOs to provide complete system specifications covering cellular telecommunications network technologies, including radio access, the core transport network, and service capabilities.
- oneM2M, which develops technical specifications and reports that address the need for a common M2M Service Layer that can be readily embedded within various hardware and software, and relied upon to connect the myriad of devices in the field with M2M application servers worldwide.
- Global Standards Collaboration (GSC), which fosters collaboration among leading global SDOs and the ITU on communications standards and on the related standards development environment. GSC members exchange information and identify common views on priority topics and collaborate in planning synergistic standards development activities that may reduce unnecessary duplication and increase efficiency.

These international collaborative efforts allow SDOs to work together effectively and efficiently to address global needs without the need to operate under any one organization's umbrella.

While international cooperation is important, ATIS believes that certain standardization needs are best addressed by SDOs that can take into account region-specific factors, including national/regional legislative and regulatory mandates. Such work in ATIS includes standards and technical reports that address technical issues pertaining to the Communications Assistance for Law Enforcement Act (CALEA)³ and efforts necessary for compliance with the Federal Communications Commission's (FCC's) network outage reporting and enhanced 911 location accuracy rules, as well as efforts to address technical issues associated with Wireless Emergency Alerting (WEA) and wireless location accuracy. ATIS is also working on issues related to the development of 5G services, focusing on attributes and requirements that may be unique to the North American marketplace. While this work is properly being completed within ATIS based on U.S. regulatory requirements, it may also serve as the basis for global efforts, including those undertaken by the ITU (as appropriate within its mandate).

ATIS believes that 3GPP is a good example of how the ICT community develops globally recognized and accepted specifications outside of the ITU, while at the same time leveraging an appropriate role for the ITU. Under this model, SDO members work together within 3GPP to develop global wireless specifications. Once completed, these specifications are published by the 3GPP Organizational Partners such as ATIS and are also transmitted to the ITU for incorporation into ITU Recommendations. oneM2M is developing a similar process, which would allow the development of specifications by oneM2M partners and permit the republication of oneM2M specifications by the ITU.

² *Input on Proposals and Positions for 2016 World Telecommunication Standardization Assembly*, 81 Fed. Reg. 30,518 at 30,519 (May 17, 2016).

³ Pub. L. No. 103-414, 108 Stat. 4279 (1994) (codified as amended in sections of 18 U.S.C. and 47 U.S.C.). Some of this CALEA-related work is done cooperatively with the Telecommunications Industry Association.

In the *RFC*, NTIA seeks input on the role of the ITU-T, asking “[i]n an environment with a wide range of industry led, multistakeholder standards development organization (SDOs) leading the development of telecommunications and information standards, does an intergovernmental organization, such as the ITU, provide any unique value?”⁴ ATIS believes that the ITU-T does have a unique role within the ICT ecosystem but that it must work alongside other stakeholders, which also have unique and important roles.

As noted in its November 2015 presentation to ANSI, the ITU-T’s mission is : (1) to develop interoperable, non-discriminatory international standards; (2) to extend and facilitate cooperation among international and regional standards bodies; and (3) to assist in bridging the standardization gap between developed and developing countries.⁵

ATIS notes that the value of the ITU-T is diminished when the ITU-T duplicates the work programs of other organizations. The role of the ITU-T, in ATIS’ view, should be to foster cooperation to help ensure that globally-encompassing standardization work is taking place but not to implement work programs where ones already exist. The ITU-T should avoid unnecessary duplication to ensure the effective and efficient use of critical industry resources.

The value of the ITU-T is further weakened by efforts to expand its scope beyond its established scope. In the past, the ITU-T has demonstrated a willingness to expand into areas that fall outside its core mission. One example of this “overreach” is the ITU Conformity and Interoperability Portal and test lab recognition program. This portal/program, which was implemented over the strong objections of many U.S. organizations and companies, attempts to enhance the conformity and interoperability of products implementing ITU Recommendations. While a worthy goal, these testing efforts fall outside of ITU-T’s mission to develop global standards.⁶

Finally, ATIS notes that the ITU-T may also benefit by greater transparency and a broader, member-driven focus. Concerns have been expressed about the manner in which decisions have been made regarding the initiation of new projects, with some new projects having been mandated rather than driven by needs of members. There have also been concerns expressed that the processes (or applications thereof) favor Administrations (Member States), which has in some cases marginalized the rights of Sector Members (industry).

⁴ *Input on Proposals and Positions for 2016 World Telecommunication Standardization Assembly*, 81 Fed. Reg. 30,518 at 30,519 (May 17, 2016).

⁵ ATIS notes that, while it had traditionally been a significant contributor to the ITU-T, its contributions have slowed in recent years due to the evolving global standards landscape and the emergence of new global collaborative efforts.

⁶ As noted previously by ATIS and others, these testing efforts by the ITU-T are also likely to be ineffective in promoting interoperability because many, if not most, ITU specifications routinely contain options that afford manufacturers the flexibility to select the combination that will afford the best response to the needs of the customer and to the marketplace. To the extent that manufacturers choose different options, equipment tested for compliance with one option may not fully interoperate with equipment that employs a different option or interprets the specification differently.

Conclusion

In conclusion, ATIS agrees with NTIA's observation in the RFC that there are numerous SDOs and other fora focused on various parts of the ICT ecosystem and that "[n]o single organization can cover all ground, nor should it try or claim to do so."⁷ While SDOs such as ATIS play critical roles in developing important global and regional consensus-based standards, other organizations, including the ITU-T, also play important roles in the ecosystem.

If you have any questions about this matter, please do not hesitate to contact the undersigned.

Sincerely,



Thomas Goode
ATIS General Counsel

⁷ *Input on Proposals and Positions for 2016 World Telecommunication Standardization Assembly*, 81 Fed. Reg. 30,518 at 30,519 (May 17, 2016).