

**Before the
DEPARTMENT OF COMMERCE
National Telecommunications and Information Administration
Washington, D.C. 20554**

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In the Matter of)	
)	
Input on Proposals and Positions)	Docket No. 200504-0126
For the 2020 World Telecommunication)	
Standardization Assembly)	RIN 0660-XC04
_____)	

COMMENTS OF CENTURYLINK

CenturyLink, Inc.¹ hereby files these comments in response to the Notice of Inquiry (“NOI”) issued by the National Telecommunications and Information Administration (“NTIA”) regarding the 2020 World Telecommunication Standardization Assembly (“WTSA-2020”).²

CenturyLink is a technology leader delivering hybrid networking, cloud connectivity, and security solutions to customers around the world. Headquartered in the United States, CenturyLink has a large presence in Latin America, Asia, and Europe. In Latin America, CenturyLink connects over 350 cities through an extended network of 20,000 intercity and metro route miles. Our Asia Pacific region has an on-net presence to 20 markets in 13 countries. In Europe, the Middle East and Africa, with a network presence in over 30 countries we are connected to all the major cloud providers across the globe. CenturyLink’s world-class network includes approximately 450,000 fiber route miles, 170,000 fiber-based on-net enterprise buildings, and 37,500 route miles of subsea fiber optic cable. Through its extensive global fiber

¹ This submission is made by and on behalf of CenturyLink, Inc. and its wholly owned subsidiaries.

² *Input on Proposals and Positions for the 2020 World Telecommunication Standardization Assembly*, Notice of Inquiry, Docket No. 200504-0126, RIN 0660-XC045, 85 FR 27390 (May 8, 2020) (“NOI”).

network, CenturyLink provides secure and reliable services to meet the growing digital demands of businesses and consumers.

CenturyLink appreciates the opportunity to provide input on the important issues raised in the NOI. Given its substantial international presence, CenturyLink has a keen interest in the activities of the ITU-T, including the upcoming WTSA-2020. CenturyLink agrees with NTIA's overall priority of maintaining open, interoperable, and decentralized Internet standards and policies, which are essential to maintaining U.S. investment, innovation, and leadership in the rapidly evolving Information and Communications Technology ("ICT") sector. Such standards and policies also are critical to accelerate economic growth and innovation in the wake of the COVID-19 pandemic.

As a member of the Internet Governance Council ("Council") and the United States Council for International Business ("USCIB"), CenturyLink supports the positions articulated in the comments filed by these organizations in response to the NOI. In this submission, CenturyLink highlights certain key issues addressed in further detail in those comments.

Constrain ITU-T's Scope. NTIA should pursue its stated goal of restructuring the ITU-T and refocusing it on its core competencies.³ As recognized in the NOI, the ITU-T's workstream has expanded in recent years into areas outside its expertise and mandate, and certain Member States and Sector Members seek to expand that scope even further, including emerging technologies.⁴ Such mission creep is neither in the interest of the U.S. nor the Internet ecosystem. The U.S. Government should work with other Member States to ensure that WTSA

³ NOI at 27391.

⁴ *Id.*

Resolutions constrain the ITU-T's focus on technical ICT standards that are within its mandate and expertise, rather than straying into regulatory and other policy issues.⁵

Avoid Duplicating Work. CenturyLink also supports NTIA's initiative to improve ITU processes, to ensure that the ITU-T is not duplicating work already being done in globally recognized, voluntary and consensus-based Standards Development Organizations ("SDOs"). The ITU's budget constraints leave no room for such duplication, which requires unnecessary participation of Member States and Sector Members and detracts from the work for which the ITU is uniquely situated.⁶

Support Internationally Recognized SDOs. Notably, some of the emerging technology initiatives that ITU members are promoting for the WTSA-2020 already are being addressed in globally recognized, voluntary and consensus-based SDOs, such as the Internet Engineering Task Force ("IETF"), the Institute of Electrical and Electronics Engineers ("IEEE") and the 3rd Generation Partnership Project ("3GPP").⁷ Given their "bottom-up" approach to standards development, these SDOs have proven "far more effective in addressing Internet policy matters against a dynamic technological backdrop than binding rules developed by an intergovernmental organization."⁸

Streamline and Consolidate Study Groups. NTIA also should advocate for a simplified study group structure, with smaller numbers of ITU-T study groups and study topics and narrowly defined missions, to stay within the ITU remit. Also, allowing virtual participation

⁵ Comments of the Internet Governance Coalition at 6 (Jun. 3, 2020) ("IGC Comments").

⁶ NOI at 27392.

⁷ IGC Comments at 14-15.

⁸ Letter from Barbara Wanner, Vice President, ICT Policy, U.S. Council for International Business, to Aimee Meacham, Office of International Affairs, NTIA, at 4 (Jun. 8, 2020) ("USCIB Comments").

while avoiding overlap with the work of SDOs will reduce the time and resources needed for participation. By mapping work across study groups, and between ITU-T and other SDOs, the ITU can gain a better understanding of where the work program of the ITU-T is consistent with the ITU's mandate and avoid duplicating work ongoing elsewhere, especially in SDOs with greater expertise on given study questions.⁹

Oppose New Internet Protocol Proposal. The U.S. Government should firmly resist proposals to create a “new IP,” which are both unnecessary and counterproductive. The IETF, which developed, maintains, and updates the TCP/IP protocol stack, expects “the existing protocol stack to continue to evolve to meet the needs of new networks and applications, just as it has for more than 50 years,” as demonstrated by its extensive ongoing work in this area.¹⁰ Moreover, a “top-down” design effort to replace the existing IP protocol stack wholesale would be harmful, “creat[ing] network islands, damage[ing] interconnection, and jeopardiz[ing] interoperability.”¹¹ Any consideration of the future evolution of IP appropriately rests within the jurisdiction of IETF and similar organizations.¹² Accordingly, CenturyLink urges the U.S. Government to strongly oppose this proposal.

⁹ IGC Comments at 14.

¹⁰ Alissa Cooper, IETF, *Liaison Statement: Response to “LS on New IP, Shaping Future Network,”* Liaison 1677 (Mar. 30, 2020), available at <https://datatracker.ietf.org/liaison/1677/>.

¹¹ *Id.* See also Hascall Sharp, *Discussion Paper: An Analysis of the “New IP” Proposal to the ITU-T* (Apr. 24, 2020), available at <https://www.internetsociety.org/resources/doc/2020/discussion-paper-an-analysis-of-the-new-ip-proposal-to-the-itu-t/> (noting that the “new IP” proposal would be costly, threaten interoperability, and complicate regulatory and legislative matters).

¹² IGC Comments at 14; USCIB Comments at 2.

Conclusion. Continuing growth in the U.S. and global economy depends on maintaining a secure, open, and interoperable Internet. NTIA plays a vital role in fulfilling this objective, including at the WTSA-2020. CenturyLink looks forward to working with the NTIA and other government actors to further the principles outlined in this submission.

Respectfully submitted,

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