Before the Department of Commerce
National Telecommunications and Information Administration
Washington, D.C.

In the Matter of	)	
	)	
ICT Development Activities, Priorities	)	
and Policies To Connect the Unconnected	)	Docket No. 210503-0097
Worldwide In Light of the 2021	)	RIN 0660-XC050
ITU World Telecommunication	)	
Development Conference (WTDC-21)	)	
	)	

COMMENTS OF GSMA

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Re: Comments of the GSMA Association on NTIA's Request for Public Comments on *Telecommunications/ICT Development Activities, Priorities and Policies To Connect the Unconnected Worldwide in Light of the 2021 International Telecommunication Union (ITU) World Telecommunication Development Conference (WTDC–21)*, Docket No. 210503-0097, RIN 0660-XC050

Introduction:

While we have much work left to do, the world has never been more connected than we are today. Since the last World Telecommunication Development Conference (WTDC) in 2017, mobile broadband coverage increased from 88% to 93% of the global population, fuelled by mobile operators worldwide investing more than $750 billion into digital infrastructure and expanding mobile broadband coverage to an additional 560 million people. These unprecedented levels of connectivity are improving people's lives and transforming socio-economic development[1]. Access to mobile internet, on which the vast majority of the world depends to go online, continues to be vital in helping to overcome the challenges of the COVID-19 pandemic.

However, despite the progress in providing connectivity to more people every day, 4 billion people are still excluded from the socio-economic benefits of mobile internet. These people are disproportionately poorer, female, rural and persons with disabilities[2]. Worldwide, women are still 15% less likely to use mobile internet than men[3].

The GSM Association ("GSMA") respectfully submits comments to the Department of Commerce ("Department") and the National Telecommunications and Information Administration ("NTIA") on NTIA's Request for Comments on Connecting the Unconnected

[1] GSMA (2021) Accelerating Mobile Internet Adoption – policy considerations to bridge the digital divide in low- and middle-income countries
[2] GSMA (2020) The State of Mobile Internet Connectivity Report 2020
[3] GSMA (2021) Top 10 recommendations for reaching women with mobile

Worldwide in Light of the ITU's WTDC-21. In preparation of WTDC-2021, our comments seek to set out recommendations regarding activities, priorities, and policies that can address the digital divide and further advance ICT development worldwide. This WTDC will take place at a crucial time and provides ITU Telecommunication Development Sector (ITU-D) with an opportunity to reshape the way it addresses the biggest needs of its members and bridge the digital divide to make it possible for everyone to participate in an increasingly connected world.

At this time, it is more important than ever that WTDC focuses on the core mandate of ITU-D which is to foster international cooperation and solidarity in the delivery of technical assistance and in the creation, development and improvement of telecommunication and ICT equipment and networks in developing countries. The conference should stay on task and not be side-tracked by proposals that overlap with work that is already being carried out in the ITU-Radiocommunication (ITU-R) and ITU-Telecommunication Standardization (ITU-T) Sectors. These efforts could divert attention away from addressing the urgent digital divide.

Challenge and Barriers:

Mobile internet connectivity and access today is not equitable. In low- and middle-income countries (LMICs), only 44% of the population are using the mobile internet, compared to nearly 75% of the population in high-income countries. In order to take appropriate action to bridge the digital divide globally, countries must address the underlying reasons that keep people from being connected. Broadly, there are two main issues to be addressed: the coverage and usage gaps.

1. **Lack of mobile broadband coverage (Coverage Gap):** More than 93% of the world's population is covered by mobile broadband, with 87% covered by 4G/LTE networks. The remaining coverage gap represents 600 million people who live in remote and

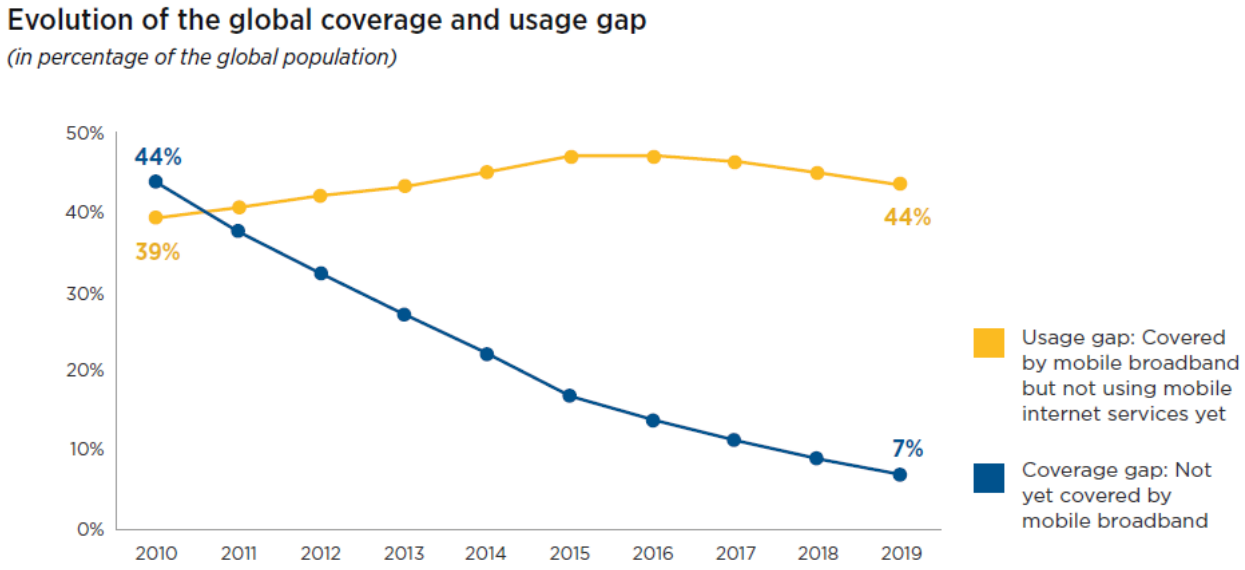
economically-disadvantageous areas, not yet covered by mobile broadband. This coverage gap is primarily an economic challenge. It can cost nearly twice as much to deploy new base stations in rural areas and up to three times more expensive to run than their urban equivalent. However, revenues in these areas can be nearly 10 times less[4]. Sadly, this means there are areas where it is simply commercially unsustainable to expand mobile broadband infrastructure today.

2. **Lack of mobile internet adoption and use (Usage Gap):** Of all the people that remain unconnected, 3.4 billion (or 85%) live in an area already covered by mobile broadband. This usage gap is particularly concentrated in LMICs, where it can be up to 70% of the total population in some countries. There are five main barriers to mobile internet adoption and use that the GSMA has identified through a variety of analyses and its annual consumer survey in LMICs. These barriers include: the affordability of internet-enabled handsets and data bundles; a lack of awareness of mobile internet and its benefits as well as the skills necessary to use it; insufficient relevant content and services that meet user needs and capabilities; concerns for user safety; and finally a lack of access to supporting infrastructure and enablers (e.g. electricity, formal identification, accessibility features). We will further explore these barriers in the comments.

Closing the usage gap should be the main priority moving forward. While the coverage gap remains a sizable challenge in many regions, especially in Sub-Saharan Africa, the size of the usage gap is larger in every region of the world. The figure below shows the global evolution of the coverage and usage gap from 2010 to 2019: the coverage gap has been closing due to

[4] GSMA (2018) Enabling Rural Coverage: Regulatory and policy recommendations to foster mobile broadband coverage in developing countries

continued investment in digital infrastructure, while the usage gap has remained relatively constant.



While a supportive environment for investment will continue to be needed in order to extend and upgrade mobile and fixed network infrastructure, it is clear that digital inclusion will require addressing the barriers preventing people from adopting and using the internet. ITU-D can play a key role in advancing such efforts.

Policy Priorities and Areas of Focus:

1. **Expand the reach of commercially sustainable networks through policies that promote investment, innovation and collaboration:** Policies should create an enabling environment that allows mobile operators to provide connectivity services cost-effectively. This remains a challenge in many countries. Final spectrum prices in LMICs are on average more than three times higher than as those in high-income countries.[5] It is also not uncommon to see short, technology-specific licences with an unclear renewal

[5] GSMA (2018) Spectrum Pricing in Developing Countries

procedure or an unpredictable regulatory environment in general. Policies and regulations to address such challenges include:

1.1 Spectrum: Assign sufficient amounts of mobile spectrum to operators in a timely manner - including sub 1GHz coverage bands - without inflating prices. It is also important to consider trade-offs between reduced spectrum fees and carefully considered wider coverage obligations. Moreover, by sharing a spectrum roadmap, governments can help reduce investment risks which positively impacts coverage expansion.

1.2 Licences: Avoid licence terms and conditions that increase costs needlessly. Long-term, technology neutral licences with clear expectations for renewal are vital. Licence obligations, such as coverage and quality of service, should be carefully considered, as inflexible or onerous conditions can negatively impact investments or consumer prices.

1.3 Infrastructure deployment: Allow for voluntary infrastructure sharing to lower the cost of deployment. At a local level, mobile operators often face a range of complex challenges, including lengthy permit approval processes with sometimes arbitrary charges and levies. National authorities can help ensure that the local planning approval process for new base stations is simplified and streamlined. Also, non-discriminatory and timely access to public infrastructure should be provided to speed up the rollout of mobile broadband.

1.4 Public intervention: Market-driven efforts result in better mobile broadband networks and coverage. Only once all regulatory measures to maximise coverage through market-driven mechanisms have been exhausted should government

intervention to support coverage be considered (e.g., universal service funds, public-private partnerships). In markets where they exist, the effectiveness of Universal Service Funds (USFs) should be evaluated as most have been found to be inefficient[6]. USFs should be sustainably supported with public funding and follow a set of best practices such as being targeted, time-bound and managed transparently[7]. If the efficient management of a USF cannot be achieved within a reasonable and defined timeframe, a roadmap should be adopted to phase them out.

2. **Accelerate demand through user-centric policies that address the barriers to mobile internet adoption and use:** Demand-side policies are often fragmented without a holistic approach to spur user adoption and use. If no action is taken, around 40% of people in LMICs will still be offline by 2025. Policy considerations to address the usage gap include:

   2.1 Affordability: The affordability of internet-enabled handsets and data services can be improved by removing sector-specific taxes and costly import restrictions, enabling innovative device financing mechanisms and data pricing strategies, and by considering strategic subsidy programmes for low-income households in close collaboration with the industry.

   2.2 Digital skills: Develop digital skills strategies that focus on specific use cases that align with user needs and motivations to learn. Training and capacity building should recognise how most people access the internet, and focus on both

[6] GSMA (2013) Survey of Universal Service Funds; ITU (2013) Universal Service Funds and Digital Inclusion for All

[7] See for best practices the GSMA Policy Handbook: Universal Service Funds

independent and community learning. To scale projects, win-win partnerships with the private sector should be pursued while digital skills development should be integrated in education policies at all levels.

2.3 Relevant content and services: Support the expansion of local digital ecosystems, by creating an environment for digital businesses to thrive, start-ups to grow and for priority sectors and SMEs to execute on their digital transformation objectives. Governments can take the lead by accelerating the digitalisation of public services, adopting a mobile-first approach while paying special attention to the needs of persons with disabilities (PWD).

2.4 Safety and security: To build confidence and trust, awareness campaigns, capacity building programmes and helplines should be provided.

2.5 Access: Expand access to electricity, including through mobile-enabled off-grid energy solutions. Registration processes for mobile and other digital services should be inclusive and transparent, which requires formal IDs to be provided to more people and consumer protection policies to be horizontally applied. SME and entrepreneurship programmes should include a gender and disability perspective, to enable greater access to sales outlets and training facilities and to encourage the development of accessibility features.

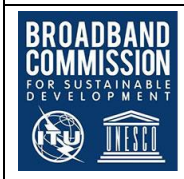
3. **Address needs of ITU-D members in a rapidly changing environment through partnerships, agility and focus:** ITU-D will have a key role to play in advancing digital inclusion and can leverage its unique position to support all of its members in such joint objectives. Priorities of ITU-D should be:

3.1 Better data: Collect and publish granular, reliable and gender-disaggregated data related to all the enablers of internet connectivity (both for infrastructure and usage). Efforts to measure levels of digital skill development should be strengthened in particular, as widely available data is still lacking. There is no need for additional global digital inclusion targets beyond the ITU Connect 2030 and the UN Broadband Commission 2025 agendas, which are already contradictory. Instead, ITU-D can support its members to implement localised frameworks for setting targets and help with gathering the necessary data.

3.2 Centre of excellence: Conduct and support research to better understand the environment, context and needs of countries and individuals to help advance policy decisions that realise greater digital inclusion. ITU-D should also focus its efforts on capacity building in partnership with the private sector and scale existing capacity building initiatives. . The core competence of ITU is infrastructure, and it should remain this way.

3.3 Partnerships: Seek partnerships with public and private sector partners on policy initiatives to accelerate infrastructure deployment and (mobile) internet adoption. ITU-D should also continue to engage with other UN agencies in an effort to avoid overlap of digital inclusion efforts at the global level. Partnerships should be specific and time-bound. Project cycles of four years – such as ITU-D Study Groups – are no longer befitting the needs of members and the pace of digital policy cycles. Instead, ITU-D could aim to transform study groups in policy design labs where practical policy challenges are addressed by a multistakeholder group.

Relevant Organisations, Forums, and Initiatives:

Name	Focus
 GSMA *(Organisation)*	Singularly positioned at the intersection of the mobile ecosystem and the development sector, GSMA's Mobile for Development programme (M4D) stimulates digital innovation to deliver both sustainable business and large-scale socio-economic impact for the underserved. M4D's unique research and insights platform advances digital innovations and implementations that empower underserved populations to build a better future. Its in-market expertise informs partnerships between the mobile industry, tech innovators, governments and the development sector. To date, M4D has impacted the lives of 93.8 million people.
 Broadband Commission *(Organisation)*	Launched by ITU and UNESCO in 2010 to bridge the digital divide and bring the goal of universal broadband connectivity to the forefront of policy discussions. Comprised of high-powered community members, the Commission hosts CEOs and industry leaders, senior policymakers and government representatives, heads of international agencies, academia, and organizations concerned with regional and global development. Together, they advocate for the power of broadband to drive sustainable development and accelerate progress towards achieving the United Nations Sustainable Development Goals by 2030. The broadband commission is a powerful vehicle to raise awareness on key topics around digital inclusion.
World Bank's Digital Development Partnership *(Organisation)*	The Digital Development Partnership (DDP) helps operationalize the 2016 World Development Report on Digital Dividends and offers a platform for digital innovation and development financing. The DDP brings public and private sector partners together to catalyse support to developing countries in the articulation and implementation of digital development strategies and plans.
UNCDF, UNHCR, UNICEF *(Organisations)*	These UN agencies have been progressively integrating digital into their work and have launched interesting initiatives to use technology as lever to deliver their development goals. Some examples include UNCDF's IDES (Inclusive Digital Economy Scorecard) to improve data guided policymaking; UNHCR's Connectivity for Refugees that focuses on displaced populations; and UNICEF's GIGA that looks into connecting schools. The ITU could play a larger role into coordinating the work between these agencies and ensure synergies are achieved.

 EQUALS *(Forum)*	Multistakeholder coalition with a mission to reverse the increasing gender digital divide by: providing opportunities for collaboration; creating a networking platform for practitioners to leverage and strengthen current efforts to bridge the gender digital divide; and measuring progress towards the implementation of Sustainable Development Goal 5.
UN WOMEN Generation Equality *(Forum)*	This new forum launched by UN WOMEN has the potential to catalyse action around the digital inclusion of women and girls.
UN Secretary-General's Roadmap for Digital Cooperation *(Forum)*	Multistakeholder forum, including member states, that addresses how the international community can better harness the opportunities presented by digital technologies while addressing their challenges. The roadmap has 8 key actions driven through working groups: 1. Achieving universal, affordable, connectivity by 2030 2. Promoting digital public goods to create a more equitable world 3. Ensuring digital inclusion for all, including the most vulnerable 4. Strengthening digital capacity building 5. Ensuring the protection of human rights in the digital era 6. Supporting global cooperation on Artificial Intelligence that is trustworthy, human rights based, safe and sustainable and promotes peace. 7. Promoting digital trust and security 8. Building a more effective architecture for digital cooperation
Digital inclusion research programmes *(Initiative)*	A number of organisations are conducting research on digital (e.g. GSMA research) to find innovative ways of addressing the underlying barriers keeping people offline. However, this research often requires primary research which is costly and time-consuming. Supporting these organisations is key to advance the knowledge and design the programmes and interventions required to tackle these barriers.
Connectivity mapping *(Initiative)*	There are a number of initiatives to map connectivity and support local governments and companies in targeting their efforts and investments (e.g. www.MobileCoverageMaps.com). Furthermore, these type of initiatives are required to measure progress and evaluate the success of policies and interventions.
Digital Skills training *(Initiative)*	Digital Skills is the main barrier preventing people from using and adopting the internet. Supporting digital skills training programmes is an effective way to make tangible progress. These initiatives are often led by mobile operators or governments (example in Rwanda).

	The GSMA has developed content that can be reused by other organisations to conduct digital skills training focused on digital inclusion.
Funding local start-ups *(Initiative)*	The lack of relevant content and services is another important barrier for adoption of the internet. Local companies develop content and services that solve problems that are important for local populations, increasing their interest in getting online. One example is the GSMA's ecosystem accelerator programme.

Desired Outcomes for WTDC-21:

Below we list a summary of desired outcomes for WTDC-21. This list of items builds on and adds to the report for the WTDC-17 conference.

- Introducing the concept of coverage and usage gaps as a tool to differentiate the supply and demand policies required to achieve digital inclusion.
- Highlight the priority of tackling demand-side barriers to close the usage gap (i.e people who live within the reach of a broadband capable network but not using the internet). The coverage gap is 600 million people, which is much smaller than the usage gap of 3.4 billion people.
- Listing the five key barriers to adoptions and use of mobile internet:
    1. **Access**: Increasing access to networks and enablers (quality network coverage, handsets, electricity, agents and formal IDs) and usability of handsets, content and services
    2. **Affordability**: Improving the affordability of handsets, tariffs, data and service fees; assisting low-income households afford equipment and services.
    3. **Knowledge and skills**: Addressing digital skills and literacy, and increasing awareness and understanding of mobile and its benefits
    4. **Safety and security**: Tackling harassment, theft, fraud and security, and building consumer trust
    5. **Relevance**: Ensuring availability of relevant content, products and services
- Highlighting the importance of the following policies to close the coverage gap:
    - Enough spectrum in both coverage bands (sub 1GHz) and capacity bands (above 1 GHz)

- Long-lasting licences with adequate spectrum prices that promote infrastructure investment
- Promoting voluntary infrastructure sharing between telecommunications providers
- Sustainably fund from public funds Universal Service Fund initiatives; USFs should follow a set of best practices, be targeted, time-bound and managed transparently
- Promote the use of connectivity mapping as a tool to inform policy making and monitoring
- Encourage regulatory certainty which in turn stimulates long-term investment and commercially sustainable networks