



June 8, 2020

Office of International Affairs  
National Telecommunications and Information Administration  
U.S. Department of Commerce  
1401 Constitution Avenue NW, Room 4701  
Washington, D.C. 20230

RE: Input on Proposals and Positions for the 2020 World Telecommunication Standardization Assembly  
[FR Doc. 2020-09835]

Dear Office of International Affairs:

IBM appreciates the opportunity to respond to *Input of Proposals and Positions for the 2020 World telecommunication standardization Assembly [FR Doc. 2020-09835]*. As a member of the International Telecommunications Union Standardization sector (ITU-T), IBM is eager to provide recommendations that can help ensure ITU-T is as effective, efficient, and fair as possible.

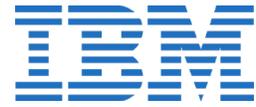
We offer six recommendations, with the first being that ITU-T Question 13 / Study Group 15, focused on issues related to time synchronization over networks, should place equal emphasis on network security as it does on performance and other considerations. The other five include steps ITU-T can make to be more scope-appropriate and efficient, such as consolidating overlapping study groups, and fairer, including by limiting overrepresentation of any one company or nation in Study Group leadership positions.

## **I. Further the Multistakeholder Approach to Internet Policy**

President Trump's February 2020 Executive Order on Strengthening National Resilience through Responsible Use of Positioning, Navigation, and Timing Services made it clear that addressing issues related to time synchronization network security is a priority for the U.S. government.<sup>1</sup> This is a priority for IBM and we believe other ITU members and U.S. industry representatives. However, ITU-T's Question 13 / Study Group 15, which focuses on time synchronization issues, has not devoted significant attention to cybersecurity issues in 2019 or 2020. Security and resiliency of time synchronization networks is critical for maintaining accuracy of time. Inaccurate time on systems can lead to a variety of issues for enterprises. These can include disruption of cryptographic applications, loss of data, adverse impact on troubleshooting and forensic efforts, reduced efficiency and safety in control systems, and failure to meet service level agreements and regulatory requirements for certain industries such as banking/finance. Given the critical importance of robust network security for time synchronization technologies, NTIA and other U.S. stakeholders should advocate for ITU-T to address security aspects of time synchronization in its 2020-2024 ITU-T agenda. Additionally, Question 13 / Study Group 15 leadership should solicit contributions on this topic from members.

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<sup>1</sup> <https://www.whitehouse.gov/presidential-actions/executive-order-strengthening-national-resilience-responsible-use-positioning-navigation-timing-services/>



## **II. Advance ITU-T Restructuring to Increase Organizational Effectiveness, Reduce Duplication and Ensure the Proper Scope of the ITU**

NTIA and other U.S. stakeholders have correctly identified ITU-T's work has expanded its scope beyond technical standards development to issues of regulatory policy. In order to increase the effectiveness and efficiency of ITU-T, IBM recommends the following study group (SG) restructuring:

- SG2 (Operational Aspects) should be closed, and it have its specific Questions under study move into the SGs that deal with the technology and protocols.
- SG3 (Economic and Policy Issues) should be removed from ITU-T. It does not deal with developing technology standards, and is therefore out of the scope of ITU-T. Instead, this work should take place in ITU's Telecommunication Development Sector (ITU-D).
- SG5 (Environment, Climate Change and Circular Economy) should be broken up and its work moved into other SGs that focus on specific technology standards, so energy efficiency and other environmental considerations can be written into the standards themselves. This is an important topic, but without conducting this work under the auspices of technology standards development, it is out of scope of ITU-T.
- SG16 (Multimedia) should be merged with SG 9 (Broadband and Cable TV) due to overlap.
- SG13 (Future Networks and Cloud) should be merged with SG20 (IoT, smart cities, and communities) due to overlap.

## **III. Improve ITU-T Processes and Procedures (i.e., Working Methods), and Transparency**

Prior to the COVID-19 pandemic, ITU-T meetings could be held in person, virtually, or a combination of the two, at the discretion of SG chairs. Though most SGs allow virtual participation, SG15 chooses not to allow it. The COVID-19 pandemic caused SG15 to relent and allow virtual participation. Though this has been proven successful, it is possible that SG15 and other SGs could revert to in-person-only meetings ITU-T should set a policy that all SGs must support virtual meetings and make in person attendance optional. This would have the added benefit of making it easier for representatives of industry and government to participate, as costs for attending in-person meetings can be significant, if not prohibitive.

## **IV. Increase U.S. Presence and Influence in the ITU-T**

Leadership positions in any particular SG can be held by multiple representatives of the same company or government, raising concerns about the fairness of SG proceedings as it may allow this overrepresented company or country to exert undue influence. ITU-T should encourage SGs to limit overrepresentation in leadership positions by restricting companies and governments from holding more than one position in a particular SG. This would increase fairness overall as well as create more opportunities for the U.S. government and U.S. industry to increase its participation in ITU-T activities.

## **VI. Explore Further Coordination and Collaboration With Other Industry-Led Standards Development Organizations**

ITU-T has done a good job of coordinating with other Standards Development Organizations (SDOs) such as IEEE and should be commended for it. Given the significant overlap of SDOs focusing on similar issues, as well as significant overlap in SDO participants, coordination and communication amongst SDOs is critical to avoid duplicated efforts.



Once again, IBM appreciates the opportunity to comment and we look forward to future engagements.  
For any questions, please contact Mr. Joshua New at [Joshua.New@ibm.com](mailto:Joshua.New@ibm.com)

Sincerely,

*Roslyn Docktor*

Roslyn Docktor  
Director, Technology Policy  
Government and Regulatory Affairs