

## ITI Response to NTIA Request for Input on WTSA-2020 (Docket No. 200504-0126)

Input for Proposals and Positions for the 2020 World Telecommunication Standardization Assembly (WTSA-2020)

### About ITI

The Information Technology Industry Council (ITI) represents over 70 of the world's leading information and communications technology (ICT) companies. We are the global voice of the tech sector and the premier advocate and thought leader around the world for the ICT industry. ITI's membership comprises companies from all corners of the technology sector, including hardware, software, digital services, semiconductor, network equipment, and internet, as well as "technology-enabled" companies that rely on ICT to transform their businesses. We engage with governments and associations around the globe to share information and work collaboratively to develop effective policy approaches that enhance cybersecurity, protect privacy, and enable businesses to thrive in an ever-changing and dynamic global market.

### Overview

ITI and our members recognize the ITU-T's history of international standards development work in the field of telecommunications. We also appreciate that NTIA is taking a comprehensive look at ITU-T's structure and working methods and assessing the U.S. government engagement in ITU-T Study Groups and conferences. Critically, we also recognize that ITU's membership has sought to inappropriately expand the mandate of ITU-T into both technologies and policy and regulatory matters for which it is unsuited.

The U.S. tech sector has largely chosen not to endorse or participate in work of this nature, opting instead to direct resources and expertise to more appropriate standards development organizations (SDOs) that develop widely adopted, voluntary, and global standards through bottom-up, multi-stakeholder processes. We appreciate NTIA's interest in pushing a more focused role for ITU-T that is clearly within its mandate, as additional work is not only redundant but also may create confusing or inadequate recommendation documents for other global participants and stakeholders.

In response to NTIA's request for input, ITI respectfully submits the below comments and recommendations regarding U.S. government engagement at the ITU-T.

### ITU-T's Role and Maintaining Effectiveness

#### Effective Consolidation

With regard to anticipated proposals likely to surface in this year's WTSA, we would emphasize that many of these are not ITU-T areas of expertise and therefore would discourage inclusion of these work items. The few items with a direct relationship to ITU-T are Mobile Virtual Networks and IMT-2020; otherwise, ITU-T is not the appropriate forum for internet policy.

Although some proposals for ITU-T work have been portrayed as relevant to telecommunications, they are much broader and do not adequately consider relevant work in other SDOs. Key examples here include proposals debated at the recent TSAG on both Quantum Technologies<sup>1</sup> and Artificial Intelligence<sup>2</sup>. Similarly, the proposal<sup>3</sup> debated at a recent TSAG meeting on a “new IP protocol system” is not appropriate for ITU-T and should be referred to the Internet Engineering Task Force (IETF), where work is already ongoing. Moreover, ITU-T work has extended beyond telecommunications standards into policy and regulatory matters related to the Internet, including privacy, content, and taxation, areas that are better suited to other SDOs.

ITI would not support the exploration of new study groups and instead supports the continued consolidation of study groups that are no longer relevant or duplicative. This consolidation should take into consideration the ITU’s core expertise and current demands of the market to encourage sector member participation.

### Internal Coordination

Relatedly, ITI does not support expansion of ITU-T work into the area of capacity-building. Development initiatives are more appropriately developed and led by the ITU Development Sector (ITU-D). Non-technical ITU-T activities might also better be considered under the ITU-D. We would recommend stronger cooperation among the ITU sectors to ensure that work is properly routed to the right working groups and experts among the sectors. Further coordination among the sectors would also result in less duplicative, overlapping work, as many of the internet policy issues being discussed and actively raised in the ITU-T are outside of its purview.

### Industry Relevance

There are several activities where ITU-T standardization in telecommunications is important and relevant to the industry. The first is Study Group 15, a truly industry-oriented study group focused on the development of global standards for the optical transport network, access network and home network. A second example is the joint activity in Study Group 16 with ISO/IEC JTC1 Subcommittee (SC) 29 on media coding to ensure high-standard video quality, which was recognized by the U.S. Academy of Television Arts & Sciences with an Emmy Award<sup>4</sup>. At the same time, there are many study groups that could be consolidated or done away with, especially in the areas of Artificial Intelligence and other emerging technologies, given the breadth of work and expertise occurring in many other fora.

## ITU-T in the Global Standards Ecosystem

### Increase Coordination & Cooperation with other Standards Development Organizations

There are many other established SDOs that are better positioned than ITU-T to develop standards in areas outside of telecommunications, especially for ICT areas and emerging technologies such as

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<sup>1</sup> Proposal to set up a new ITU-T Focus Group on Quantum Information Technology for Networks (FG-QIT4N) <https://www.itu.int/md/T17-TSAG-C-0097/en>

<sup>2</sup> IEC/ISO/ITU SPCG recommendation on TSAG-C63 Proposal to set up a new ITU-T Focus Group on AI and Data Commons <https://www.itu.int/md/T17-TSAG-190923-TD-GEN-0604>

<sup>3</sup> LS on New IP, Shaping Future Network [from TSAG] <https://www.itu.int/md/T17-SG16-191007-TD-GEN-0409>

<sup>4</sup> <https://www.iso.org/news/ref2235.html>

AI, IoT, and quantum computing. ITI and our companies urge ITU-T to avoid initiating work with goals that duplicate or substantially overlap with work underway or planned in other SDOs that already have a track record of success in developing timely, high quality and market-relevant standards. Instead, ITU-T should refer its members to relevant work underway or planned in other SDOs. To maintain a landscape of interoperable standards for its members, it should reference that work where appropriate in its Recommendations and expand engagement with other SDOs to avoid redundancies and increase cooperation – examples include IETF, IEEE, W3C, ISO/IEC JTC 1, etc. The ITU-T should support internationally recognized standards wherever they originate.

### Concerns with Working Methods and Processes

ITI members note concern with the proliferation and prolonged existence of Focus Groups. Ostensibly formed to study new and emerging topics, these groups often produce initial proposals or white papers, which are then put forth as the basis of Recommendations in parent study groups with little scrutiny.

The current total of 11 study groups is far too many and exceeds the bounds of current standardization work relevant to ITU-T. Still, many study groups are actively looking for new work, though they have limited relevance and mandate. Rather than seek new initiatives, the study groups should focus on relevant topics and suspend activity when the work is complete. During the upcoming WTSA, ITI strongly recommends that the U.S. government press to reduce the number of and appropriately scope study groups to relevant standardization topics within the purview of the ITU-T.

### U.S. Participation and Leadership

Given shifts in the market, U.S. industry participation in ITU-T activities has declined as industry has focused on broader ICT and emerging technologies development efforts under other SDOs and fora that have a track record of developing timely, high quality, market-relevant standards. When companies have to make strategic and budgetary decisions on where to participate in standards development, the calculation rests on which body will produce the highest value, most useful standards. Expert technologists from the U.S. and EU generally do not participate in the ITU-T where there are other standards organizations that offer a higher return on investment of time, money, and expertise. However, the absence of technical expertise in the ITU-T means there may be inadequate expertise and scrutiny informing standards development work at the ITU-T. In addition, governments and sector members from a few countries have filled that void to push standards in line with national priorities or to entrench standards developed by “national champion” companies. The resulting Recommendations adopted by ITU-T are not high-quality and counterproductive to industry innovation and competitiveness. Industry relies on NTIA and the USG to discourage ITU-T from initiating work that is better placed in other organizations.

### Supporting U.S. Government Policy Priorities

The U.S. government has an important opportunity to limit the ITU-T’s forays into areas that are better handled in other organizations via changes to ITU-T governance at WTSA-20. As one example, the ITU-T membership could commit to embracing the WTO principles for international standardization, including the principle of Coherence which calls on international SDOs to “avoid duplication of, or overlap with, the work of other international standardizing bodies.” In general, we would refer to work on 5G in other SDOs and eschew using ITU recommendations for technical

specifications around 5G, particularly with respect to privacy or “trustworthiness” of data, devices, and networks.

NTIA and U.S. government colleagues should continue to pay close attention to proposals that could segregate a market, particularly in communications areas; would give a company, country, or region the ability to terminate or slow down digital services; or introduce a way for one company, country, or region to control a class of digital products or services. In particular, NTIA should oppose the ongoing New Internet Protocol (“New IP”) Proposal, which would likely reduce interconnectivity across networks and give undue influence to governments in operating internet protocol. The IETF characterizes the New IP proposal as a “harmful” top-down approach to structuring internet protocols.<sup>5</sup> The U.S. government should also raise concerns for any proposals that require proprietary (e.g. source code), personal, or other sensitive information be shared with a government or customer, or other invasive data sharing requirements in the name of national security, cybersecurity, or privacy.

As a United Nations organization, the ITU Standardization Sector provides governments with a valuable opportunity to discuss a range of standards policy issues with a wide array of stakeholders. Given its broadband and telecommunications remit, the ITU Standardization Sector is a particularly valuable forum in which governments and their delegations can reach consensus on related technical specifications and in doing so promote greater access to broadband. The United States maintains many key interests in remaining at the table in order to prevent the introduction of barriers to these essential services.

## Recommendations to the U.S. Government

The U.S. should:

- Encourage WTSA to delineate the scope of ITU-T’s standardization program to maintain a tighter focus on telecommunications and to avoid overreach.
- Encourage WTSA to reduce the number of study groups for the next study period to drive efficiency and focus.
- Take stronger positions, including through voting and veto power, to avoid the initiation of new work that falls outside of telecommunications or ITU-T’s recognized areas of competence, work that is best addressed by other ITU sectors, or work that is under development/scope of other established SDOs or global industry.
- Adopt a position that ITU programs related to development and capacity building should be appropriately placed within the ITU-D.
- Maintain communication with U.S. and other stakeholders to increase awareness of proposals that exceed the scope of the ITU.

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<sup>5</sup> For more, see the IETF Liaison’s statement from March 30, 2020 around the lack of technical merit in this New IP Proposal and associated concerns: <https://datatracker.ietf.org/liaison/1677/>