

**Before the
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION U.S.
DEPARTMENT OF COMMERCE
Washington, DC**

In the Matter of)	
)	
)	
Telecommunications/ICT Development)	
Activities, Priorities and Policies To)	Docket No. 210503–0097
Connect the Unconnected Worldwide in)	
Light of the 2021 International)	
Telecommunication Union (ITU) World)	
Telecommunication Development)	
Conference (WTDC–21))	
)	

COMMENTS OF INMARSAT, INC.

Inmarsat, Inc. (“Inmarsat”) hereby responds to the National Telecommunications and Information Administration (“NTIA”) public notice¹ requesting comments on the *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)*.

Inmarsat is the world leader in mobile satellite communications, operating a global system of 14 geostationary satellites and associated ground infrastructure that offers a wide range of communications solutions to customers on land, in the air, and at sea. Inmarsat has an unrivalled track record of operating the world’s most reliable global mobile satellite telecommunications networks, sustaining business and mission critical safety and operational applications for more than 40 years.

¹ National Telecommunications and Information Administration (NTIA), *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 Number 210503–0097, (May 6, 2021) (“Public Notice”).

In its work to close the digital divide, ITU-D prioritizes those who are most vulnerable and most in need, including those living in the world's least developed countries as well as marginalized communities everywhere, which would include remote areas in the U.S. that have little or no coverage. Inmarsat has been actively involved in the work of the ITU-D including actively contributing to and participating in all major meetings and programs.

Inmarsat has a long history of supporting ICT development activities and providing connectivity to unserved and underserved communities worldwide. For example, Inmarsat provided connectivity in remote villages in Benin and Nigeria for e-health².

Inmarsat fully supports the efforts of the Administration, the Department of Commerce (DOC) and the National Telecommunications and Information Administration (NTIA) in this area and respectfully provides its views on the questions below.

1. ICT Development Priorities

(a) Over the next five years, what should the U.S. government priorities be for telecommunications/ICT development?

The U.S. government priorities for telecommunications/ICT development should focus on ensuring that its policies and regulations are balanced and technology neutral, supporting the use of a mix of technologies which is to only true path for no one to be left behind. Solutions based on multiple technologies can speed up the time to connect communities and can reduce the cost of roll-out. Therefore, it is essential to have a balanced allocation of spectrum across all services and all industries so that everyone, even those in rural or remote areas, may be connected.

² See "Inmarsat brings life-saving connectivity to remote African village", Inmarsat, <https://www.inmarsat.com/en/news/latest-news/enterprise/2014/inmarsat-brings-life-saving-connectivity-remote-african-village.html>. See also "Satellites for SDGs: Can satellite connectivity help nations achieve the United Nations' Sustainable Development Goals (SDGs)? Three diverse projects in Nigeria, Indonesia and the Philippines put our services to the test", Inmarsat, <https://www.inmarsat.com/en/sustainability/satellites-for-sdgs.html>

(b) Are there particular areas of focus for economic development, as well as telecommunications/ICT development that might help the United States align with developing countries' development interests?

One relevant and timely area of focus for ICT development that might help the U.S. align with developing countries' development interests is connecting the unconnected. Digital technologies are at the forefront of development and provide a unique opportunity for countries to accelerate economic growth and connect citizens to services and jobs. In times of crisis, from natural disasters to pandemics such as the one the world experienced with COVID-19, digital technologies are what's keeping people, governments and businesses connected. They can unlock innovative solutions to complex development challenges and help countries skip traditional stages of development from digital banking to blockchain and telemedicine.³

Now more than ever, we all realize the importance of connecting people everywhere. The pandemic has demonstrated the absolute importance of connectivity. People who are not connected cannot really participate in society and do not have access to education, medicine, or the ability to work. With the COVID-19 pandemic, the digital divide has been exposed like never before. Billions of people are going online to stay in touch, attend schools, work and etc. during the pandemic. However, almost half of the world's population has no access to the internet, many of those are in developing countries. Therefore, by focusing on connecting the unconnected, the U.S. will align with developing countries' development interests.

(c) What are valuable venues, forums, or methods to focus this work?

The ITU is certainly a very valuable venue for addressing the issue of connecting the unconnected. The UN is also an important one as well as UNESCO. In addition, the Broadband Commission for Sustainable Development and the World Economic Forum are actively working on this matter. Moreover, the World Bank provides knowledge and financing to help close the global digital divide, and make sure countries can take full advantage of the ongoing Digital Development revolution. Regional organizations like the Inter-American Telecommunication Commission (CITEL), Commonwealth

³ <https://www.worldbank.org/en/topic/digitaldevelopment/overview>

Telecommunications Organization (CTO), the African Telecommunications Union (ATU), the East African Communications Organization (EACO), the Comisión Técnica Regional de Telecomunicaciones (COMTELCA), the South African Development Community (SADC), the African Union Commission (AUC), the Caribbean Telecommunications Union (CTU), the West Africa Telecommunications Regulators Assembly (WATRA) and others are also useful forums to understand the issues faced by the regions and discuss possible solutions and supporting policies.

2. U.S. Stakeholder Community

(a) In General

i. What are the challenges or barriers towards connecting the unconnected?

Lack of coverage and financing/affordability are the main challenges towards connecting the unconnected. Over 750 million people, around 10 per cent of the global population concentrated in rural and remote areas, are still not covered by mobile broadband (a 3G connection or higher)⁴. This lack of coverage can be addressed by deploying solutions based on multiple technologies.

Satellite technology can play a crucial role in expanding broadband coverage across the globe, including to the hardest-to-reach corners of the Earth. In addition to their broad coverage, versatility and reliability, deployment can be relatively quick, cost-effective and environmentally responsible. Satellite technology is – and will continue to be – an essential component of the plan to meet the goal of universal broadband availability. In this sense, satellite broadband technology helps make the Internet more ubiquitous, by facilitating access to the Internet in places where it has not been previously available.

Without sufficient commercial incentives it is difficult to bring connectivity to these areas. Solutions could be found through the development of public-private partnerships. National and local governments, international organizations and development banks

⁴ <https://www.gsma.com/mobilefordevelopment/wp-content/uploads/2019/07/GSMA-State-of-Mobile-Internet-Connectivity-Report-2019.pdf>

should establish partnerships with the private sector. These could be in the form of government financial assistance to operators to facilitate services to less commercially viable areas. In addition, in order to attract investments governments must ensure a solid, detailed, and transparent institutional and regulatory framework and a holistic vision to implement it.

ii. What types of activities or projects have been most successful in building capacities of developing countries towards increasing telecommunications/ ICT development and inclusion?

Capacity Building Programs addressing ICT issues have been very successful. For instance, the ITU Academy, which is the main online gateway to ITU's capacity development activities, brings together under one umbrella a wide range of training activities and knowledge resources in ICTs and digital development. Similarly, the World Bank Open Campus offers several online courses related to ICTs. There are many other organizations providing capacity building trainings and those are very important for developing countries.

iii. How can virtual platforms increase capacity building, especially since COVID-19 began?

Virtual platforms are playing a crucial role in increasing capacity building, particularly during the pandemic. Training by international organizations, development banks, governments, universities, and others including civil society enabled those who had connectivity access to further develop their skills and knowledge. Currently, Inmarsat is working with the ITU and the UN to train staff ahead of the hurricane season on testing and use of critical satellite equipment.

iv. How best can the U.S. government share its experiences and best practices on telecommunications/ICT deployment overcoming the digital divide, and other telecommunications/ICT developmental topics? In 2021? Longer term?

The U.S. government has very valuable experience that could help other countries that are developing ICT policies and it could share its experiences and best practices on

telecommunications/ICT deployment overcoming the digital divide at ITU-D meetings and events as well as in capacity building events.

vi. What types of financing or other partnership mechanisms, including particular organizations or venues, may help advance global ICT development?

Public-private partnerships and a multi-stakeholder approach will be key to advancing global ICT development. There are many organizations that could play an important role, including the ITU, the development banks, regional organizations, academia and the private sector. This is also one area where non-traditional stakeholder sectors such as the financial, educational, health can collaborate with the telecom sector to great effect.

3. WTDC-21

(a) What WTDC-21 outcomes would best help achieve the Conference's goal to connect the unconnected and to help raise awareness and mobilize resources to close the digital divide?

When setting the strategies and objectives for the development of telecommunication/ICT, WTDC-21 should ensure that their priorities are balanced and inclusive of all technologies. WTDC-21 outcomes should encompass a holistic approach and should encourage a multi-stakeholder effort to address the issue of connecting the unconnected. WTDC-21 must avoid bringing artificial requirements because we will not close the digital divide if we maintain the same approach and keep artificial requirements.

WTDC should position itself as the most relevant cross sector/cross industry platform for development matters. WTDC should not overtake any spectrum matters or advise administrations on anything that refers to spectrum decisions. This is also true for Study Groups and ITU-D in general.

It is essential that questions in the Study Groups are relevant and aligned with the realities of different countries and regions. It is also necessary to have wide participation from different regions and industries in the positions of rapporteurs and co-rapporteurs, if

only a few companies or people are involved and others excluded the result will be biased and less impactful

The U.S government can support a wide and inclusive representation in leadership positions in the Study Groups so that views of different players are taken into account.

Inmarsat appreciates the opportunity to respond in this important proceeding. Inmarsat welcomes the opportunity to work with the United States government to ensure the continued leadership of the United States in ICT development worldwide.

Respectfully submitted,

/s/Donna Bethea-Murphy
Donna Bethea-Murphy
Senior Vice President, Global Regulatory

Renata Brazil-David
Director, Regulatory Policy

Inmarsat, Inc.
1441 L Street NW Suite 610
Washington DC
20005
USA