June 8, 2020

Via email to ameacham@ntia.gov and WTSA2020@ntia.gov

Aimee Meacham
Office of International Affairs
National Telecommunications and Information Administration
U.S. Department of Commerce
1401 Constitution Ave NW, Room 4701
Washington, DC 20230

Dear Ms. Meacham:

Intel Corporation welcomes the opportunity to respond to NTIA's request for Input on Proposals and Positions for the 2020 World Telecommunication Standardization Assembly (Docket No. 200504-0126). Intel is a leader in designing and building the essential technologies that serve as the foundation for the world's computing and communications devices. Intel participates in over 250 standards and industry groups worldwide including industry alliances, regional standards organizations, international industry standards groups and formal international standards bodies. Intel is an ITU Platinum Sector Member; a full member of all three Sectors of the ITU.

The Coronavirus disease pandemic has put a spotlight on the importance of resilient, high-speed broadband networks. As travel and face to face interaction have been severely limited in many parts of the word, people have become more reliant on access to the internet for work, education, entertainment and to stay connected with family and friends. Yet, nearly half of the global population is not connected to the internet and many of those who are connected suffer from unreliable and slow network connectivity. Affordability of broadband networks/services is also very important. The ITU-T has a very limited budget; it should be used in the most effective way to develop broadband core networks and affordable connectivity, especially considering the limited resources of developing countries and the impact of COVID-19 on the global economy.

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In this environment, the ITU-T should commit to focus on standardization work in its area of core competency (core broadband networks, connectivity, numbering, etc) and should not initiate technical work and policy activity in new emerging areas, especially when those areas are already covered by other organizations. ITU-T formed SG 20 to develop standards in the field of Internet of Things (IoT) even though IoT standardization was well established in other organizations with strong participation by global industry. Many recent project proposals (new IP protocols, artificial intelligence, quantum technologies) describe work that is already well covered by other organizations. Organizations such as 3GPP, IETF, IEEE, OCF, and ISO/IEC in its JTC 1 have participation by leading experts and the organizations' standards are globally relevant and widely adopted. ITU-T could consider referencing or supporting that work, or cooperating with those organizations, but it should not duplicate their efforts. WTSA should formally resolve that ITU-T will not initiate work that duplicates or conflicts with work of another SDO developing globally relevant standards, and TSB staff should guide the ITU-T to avoid duplication and conflict.

Attempts by ITU-T to assert control of the Internet or to take policy positions on internet governance would be harmful to industry and society overall. Similarly, ITU-T should not attempt to initiate work to secure 5G supply chains or in the automotive, healthcare, or financial sectors.

Considering the concerns about duplication and conflict with work properly placed in other organizations, it is critical to improve the rules on the establishment of focus groups. Decisions to create focus groups should be based on consensus, and those decisions should be made by TSAG and not by ITU-T Study Groups. The UK proposal to CEPT's ITU meeting on the revision of Recommendation ITU-T A.7 "Establishment and working procedures of ITU-T Focus groups" deserves US support.

Intel supports NTIA's view that the number of Study Groups should be reduced through consolidation, including the merger of SG 11 and SG 13. Intel also supports the US contribution to CITEL that would consolidate the work of ITU-T into eight study groups for the new study period. ITU-T Study Groups and their working areas should be scoped according to ITU-T's core competencies. For example, ITU-T SG 17 should remain focused on network security and should avoid initiating fundamental cybersecurity and privacy projects that are the purview of ISO/IEC JTC 1 SC 27.

If the ITU-T study group structure remains unchanged, Intel suggests that NTIA prioritize participation in SG 5, SG 13, SG 17, SG 20, and in Focus

Groups that are pursuing work already covered by other SDOs (eg. AI, Quantum Technologies). NTIA should support US stakeholder interests by discouraging work that duplicates or conflicts with the work of other established SDOs. We do not see a need to form any new study groups.

US companies recognize the important roles of ITU-R and ITU-D and they are active participants in the work of those sectors. Intel agrees with the NTIA view that cooperation among the 3 sectors of ITU within their domain of expertise and charter is important, and that ITU-T cannot afford to undertake work properly placed in ITU-R or ITU-D. Such blurring of responsibilities among the three sectors of the ITU leads to inefficient use of resources (eg. frequent unnecessary liaison statements over jurisdiction issues) and could damage the integrity of the Union. As an example, conflict/duplication of work has been observed between ITU-D Study Groups and ITU-T SG 3 and SG 20. Intel supports the transfer of policy components from ITU-T to ITU-D. There may also be an opportunity for ITU-D to help developing countries become more involved in industry driven SDOs that are a focus of ICT standards development.

In summary, the ITU-T has a very important but limited charter. There is important work ahead to bring reliable broadband network connectivity to the world's population. In an environment with limited resources, the ITU-T can best pursue that opportunity by focusing on its area of core competency and by committing not to duplicate or conflict with the ICT standards being developed by other well-established organizations.

Thank you again for the opportunity to provide these comments.

Sincerely,

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