Internet Society
Response to the
NTIA's Request for Comments on
Connecting the Unconnected Worldwide
in Light of the ITU's WTDC-21

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The Internet Society is pleased to submit this contribution to the National Telecommunications and Information Administration's (NTIA) *Request for Comments on Connecting the Unconnected Worldwide in Light of the ITU's WTDC-21*.

Since the Internet Society's establishment nearly three decades ago, it has been a leader in pioneering catalytic initiatives that range from capacity building, community support, and building and improving Internet infrastructure and resilience around the world. As we work for an Internet that is open, globally connected, secure, and trustworthy, the Internet Society has been collaborating closely with stakeholders at the global, regional, and local level on the development of Internet infrastructure, technologies, open standards, and policy frameworks.

As a Sector Member of the ITU, the Internet Society is participating in the WTDC -21 preparatory process and shares the enthusiasm that has been building over the months to shape a conference that is squarely focused on development and can result in action-based opportunities to address the connectivity divide. With this contribution we highlight the importance of community networks as a sustainable, effective and efficient means of ensuring connectivity in under-served and unserved areas. We are hopeful that the discussions at WTDC-21 will result in an enabling regulatory and policy environment that support alternative connectivity solutions.

3a. 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?

While tremendous progress has been made to connect the unconnected over the past several decades, a digital divide persists. Moreover, the gender digital divide is proving difficult to overcome, and there is also an urban-rural digital divide. After more than 25 years of Internet development, network infrastructures built and operated on traditional business models have not reached many underserved, remote and hard to reach rural areas. Furthermore, this connectivity gap undermines the progress that has been made towards achieving the 2030 U.N. Sustainable Development Goals. Community networks are a complementary connectivity solution for some of the hardest to connect areas in the world.

Community networks[1] represent a sustainable, effective and efficient approach to connectivity that directly involves the very people who face a connectivity gap. Our experiences show that they are naturally complementary to existing networks. However, their development faces a

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[1] https://www.internetsociety.org/issues/community-networks/

myriad of challenges: lack of affordable access to backbone infrastructure, business and/or service licensing requirements, expensive regulatory fees and taxes, poor access to spectrum, and limited funding – including difficulty in obtaining universal service funding. It is important that we approach these challenges holistically. Therefore, we urge policymakers and regulators to consider the benefits of community networks, and to reduce or eliminate barriers to allow them to develop.

The COVID-19 health pandemic has shown the world how important the Internet is during a crisis. The Internet has been a lifeline, enabling millions of people to continue working and studying while following stay-at-home orders. It has provided access to crucial health information, and allowed families, separated due to travel restrictions or quarantine, to stay in touch. And, despite significant increases in the volume of traffic on its networks, the Internet has proved that it is up to the challenge. Its technical foundation – a network of networks operated cooperatively by service providers and platforms – has ensured the Internet has not experienced catastrophic failure.

However, the coronavirus has also brought many challenges to light. Nearly 50 per cent of the world's population have not been able to work or study from home because they lack access to the Internet. For many that do have access, slow speeds and high prices characterise their Internet service, preventing them from taking part in daily life.

The digital divide risks depriving a generation the opportunity to develop their potential and their ability to uplift their entire communities economically and socially. That divide must be erased. Community networks can play an important role in efforts to ensure no-one remains on the wrong side of the digital divide by:
- Becoming an important element of expanding access to remote and rural places where traditional networks would hesitate to operate/invest primarily due to zero business case.
- Demonstrating the ability of community networks to dynamically response during unforeseen events such as the COVID-19 pandemic.
- Promoting partnerships between local communities, providers, governments, academia, and civil society. CNs help indeed to ensure an inclusive Internet that connects and can be afforded by everyone.
- Serving as a means for community members to create, discuss and exchange information that is of interest to them, hence not only contributing to universal access but also innovation and digital content creation.

Fostering an Enabling Environment for Complementary Connectivity Solutions
Bridging the digital divide requires proactive steps and a commitment to achieve a shared goal of connecting the unconnected. To enable community networks as a solution requires:
- Opening up access to and eligibility for funding mechanisms such as Universal Service Funds for community networks.
- Creating innovative and appropriate licensing and authorization frameworks that are affordable and easy to understand for small-scale community operators.
- Examining ways to provide spectrum to community networks.

- Adopting innovative spectrum licensing frameworks to create opportunities to access unused spectrum.[2]

For more detailed information, see ISOC's ITU-D Study Group (SG-1) 1/Question1 Submission "Creating an Enabling Regulatory Environment for Community Networks."[3]

On the Road to Addis Ababa, Ethiopia: Our Call to Action

As governments and stakeholders prepare for the WTDC in Addis Ababa, we call on stakeholders to consider this conference as a turning point in collaborative development to connect more people for greater socio-economic development. Recent activity in the CITEL region led to CITEL governments and stakeholders agreeing to include Community Networks as a priority for the region. At the WTDC in Addis Ababa, we believe all ITU stakeholders need to act together to find innovative and complementary ways connect communities and the unconnected. We must consider ways to change old regulatory and policy models and work with a range of stakeholders to create that change. We respectfully urge NTIA to support new connectivity models, new financing models for connectivity, and ways to change existing policy-models to connect the underserved and unserved communities.

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[2] https://www.internetsociety.org/wp-content/uploads/2017/10/Spectrum-Approaches-for-Community-Networks_20171010.pdf
[3] https://www.itu.int/md/D18-SG01.RGQ-C-0338/

Additional Resources:
- Information about ISOC and our work and partners in building Community Networks: https://www.internetsociety.org/issues/community-networks/
- Unleashing Community Networks: Innovative Licensing Approaches: https://www.internetsociety.org/resources/2018/unleashing-community-networks-innovative-licensing-approaches/
- Policy Brief: Spectrum Approaches for Community Networks: https://www.internetsociety.org/wp-content/uploads/2017/10/Spectrum-Approaches-for-Community-Networks_20171010.pdf
- Innovations in Spectrum Management: https://www.internetsociety.org/resources/doc/2019/innovations-in-spectrum-management/
- Community Network Policies: A Collaborative Governance towards Enabling Frameworks: https://comconnectivity.org/wp-content/uploads/2020/05/building_community_network_policies_-_a_collaborative_governance_towards_enabling_frameworks.pdf
- COVID-19 Policy Recommendations: https://www.internetsociety.org/covid19-policy-recommendations/
- CN Case Study, Connecting to Sovereignty with the Waimanolo Community Network: https://www.internetsociety.org/issues/community-networks/success-stories/waimanalo/
- CN Case Study, Tusheti Region, Georgia: https://www.internetsociety.org/resources/doc/2017/tusheti-case-study/
- CN Case Study, El Cuy, Argentina: From Isolation to Preparedness and Empowerment in Rural Argentina