



June 7, 2021

Ms. Diane Steinour  
Office of International Affairs (OIA)  
National Telecommunications and Information Administration (NTIA)  
U.S. Department of Commerce  
1401 Constitution Avenue NW, Room 4701,  
Washington, DC 20230

Submitted electronically to [WTDC21@ntia.gov](mailto:WTDC21@ntia.gov)

Dear Ms. Steinour:

This responds to the National Telecommunications and Information Administration's (NTIA) *Federal Register* Notice of May 6, 2021,<sup>1</sup> which requests comments about Telecommunications/Information and Communications Technology (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).

The U.S. Council for International Business (USCIB)<sup>2</sup> holds in high value the work of the ITU Development Sector aimed at building capacity to ensure that the global citizenry can reap the economic and societal benefits that come with telecommunication and Internet connectivity. We applaud the leadership of Doreen Bogdan-Martin, Director of the Telecommunication Development Bureau (ITU-D), who has focused on widening the communities of interest represented in ITU-D activities to include greater involvement by a global business community that can provide practical insights.

As WTDC delegates consider priorities for the 2022-25 ITU-D work program, USCIB members urge that the over-arching vision for development assistance be to ensure open, secure, reliable, and interoperable communications for all. Such vision, in turn, should guide business and government in partnering to realize a concrete, measurable reduction in the digital divide, an expansion in digital inclusion and skill development, and greater alignment of ICT/telecommunication goals among developed and developing countries alike.

We offer the following thoughts on WTDC-21 priorities as well as address some of the questions you have posed:

**1. Importance of Multistakeholder Engagement on ICT Policy Issues – As we have noted in**

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<sup>1</sup>Request for Comments, 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), *Federal Register* Vol. 86, No. 86, Thursday, May 6, 2021.

<sup>2</sup> The U.S. Council for International Business (USCIB) is a trade association composed of more than 300 multinational companies, law firms, and business associations from every sector of the U.S. economy, with operations in every region of the world. We note that USCIB Members include a broad cross-section of the global companies in the information and communications technology (ICT) sectors as well as leading users of ICTs. We welcome this opportunity to offer a multi-sectoral perspective on priorities for the 2021 World Telecommunication Development Conference.

statements before various global forums, USCIB believes that the multistakeholder model for Internet governance continues to be the best method to enable whole-of-society/whole-of-government consideration of Internet policy issues that is grounded in democratic values and the principles of transparency, accountability, and consensus. Given the rapid pace of technological change, governments need the perspectives provided by business, the technical community, and civil society to better understand what policies are commercially viable, technically feasible, and offer adequate user protections. The inputs of all stakeholders produce a flexible policy environment critical to empowering the rapidly evolving digital economy.

Importantly, such stakeholder inclusion can lower the risk of unintended consequences and increase legitimacy and adoption of policies. Top-down government-imposed policies and regulations often cannot keep pace with technological breakthroughs and can serve as a drag on development and innovation, plus potentially infringe upon human rights.

The turbulent economic and political backdrop caused by the COVID-19 pandemic makes such multistakeholder participation even more important to ensure that Internet policy remains grounded in sound commercial and technical expertise. We applaud BDT's recognition that the WTDC-21, indeed, should feature multistakeholder dialogue to best ensure development focused outcomes that are practicable.

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

U.S. government priorities at the ITU and in other international forums considering telecommunications/ICT development should focus on the following:

Inclusive Capacity Building -- ITU-D has developed and led capacity-building initiatives assisting both developed and developing countries and sector members of the ITU and facilitating sharing of best practices on how technical issues are resolved to support ubiquitous connectivity in developing countries. The U.S. government should continue to support the ITU-D in these endeavors. As we detail later in this submission, the private sector recognizes the importance of supporting capacity building through partnerships with national governments, NGOs and non-profit organizations.

In the near-term, the U.S. government therefore should look to business and other stakeholders as willing and able partners in pursuing an inclusive approach to fostering telecommunications/ICT capacity in the developing world. Such collaboration will enable fulfilment of the full potential of the Internet and ICTs to promote sustainable development through flexible, globally consistent, and market-driven technical standards.

In the longer-term, the U.S. government should refine its ITU-D strategy to include consideration of U.S. leadership roles, enhanced regional/bilateral outreach, and like-minded coordination and intersection with digital economy and ICT development objectives and activities across multiple fora. Further, the U.S. government should

identify a broader range of telecommunications/ICT development stakeholders for collaboration and partnership. Importantly, the U.S. government should proactively develop a strategy to appropriately limit the scope of ITU work on emerging technologies, including Artificial Intelligence (AI). Overall, we do not support use of ITU-D resources in this area and urge that the D Sector pursue capacity building in a manner that remains firmly rooted in the ITU's technical telecommunications/ICT standardization core competency.

Broadband Build-out and Adoption -- The economic and societal benefits of telecommunications/ICTs can only be realized if there is universal deployment of broadband technologies, whether they be fixed, mobile, or satellite, and universal adoption of broadband where it has been deployed. As NTIA points out in the Notice, only 51 percent of the world's population is online, leaving nearly four billion people unable to connect to the Internet. If we are to succeed in [connecting and enabling the next billion](#) people, it is critical that both developed and developing countries alike do more to incentivize investment in and deployment of broadband infrastructure technologies, and devices, all of which are necessary for a rapidly evolving digital ecosystem.

Spectrum Availability -- In addition, the availability of licensed spectrum for exclusive use and shared use as well as unlicensed use has an important and complementary role in promoting the accessibility of the Internet and its developmental potential. There are many important uses of spectrum, including broadcast and mobile broadband, satellite, and Wi-Fi. Streamlined, effective and technologically neutral management of this increasingly scarce resource must be a priority for governments while ensuring the integrity of services offered by existing spectrum license holders.

3. What are valuable venues, forums, or other methods to focus economic development work and aligns with developing countries interests?

USCIB has been a long-time champion of the United Nations (U.N.) Internet Governance Forum (IGF) as a premier global forum for socializing proposals and providing practical, educational guidance on a wide range of telecommunications/ICT issues. A case in point: One of the main, outcome-focused issues for workshops and plenaries at the 2021 IGF will be [universal access and meaningful connectivity](#).

The 2021 IGF will be hosted in Katowice, Poland, 6-10 December 2021. Unfortunately, the deadline for workshop/plenary proposals was May 26. Nevertheless, the U.S. government should pursue opportunities at the IGF 2021 via bilateral meetings, so-called "Day Zero" sessions, or the innumerable other meeting opportunities made available to governments at the IGF to promote its goals for the WTDC-21. The U.S. Government also should use the IGF to promote U.S. "best practices" and telecommunications/ICT learning experiences to developed and developing country representatives in attendance – either in person or via virtual platforms. The latter innovation will enable even broader engagement with country representatives still unable to travel due to pandemic conditions.

4. What are the challenges or barriers to connecting the unconnected? Are there particular lessons or policy approaches regarding the gender digital divide?

Investment in Innovation – We need to create an enabling environment for new investments in technology solutions. The U.S. government and other developed country governments should consider the totality of the policies – tax policies, R&D incentives, direct government support, public-private partnerships -- that would foster new uses of cutting-edge technologies so they are more affordable and easily deployed in developing countries lagging in connectivity.

Financing and Affordability -- As we note above, the financial straits of citizens throughout the world as well as the finite resources of business to connect under-served communities certainly challenge our efforts to connect the unconnected. Government policies to address the broadband gap should recognize that government subsidization may be necessary for industry to bring broadband to less densely populated areas and low-income customers.

Digital Inclusion – Addressing digital skills gaps, online safety, the gender digital divide, and other challenges to digital inclusion will be necessary to fully realize the benefits of ICT connectivity. The ITU-D could be a productive body through which the U.S. Government can help implement and grow digital literacy programs that empower under-resourced populations to develop and capitalize on critical ICT skills. Successful digital inclusion programs will incorporate and leverage capacity-building investments in local communities, particularly in education, health care, and other social services. NTIA should encourage the ITU to support such programs that lead to digital skills development and proven outcomes for previously excluded populations.

5. What corporate social responsibility, goodwill programs, or corporate partnership programs may be useful resources?

- Bridging the homework gap: Over the last 12 years, AT&T has invested more than \$600 million to help close achievement and representation gaps in under-resourced schools and communities. When the events of 2020 forced more than 50 million U.S. students out of the classroom, we launched the \$10 million AT&T Distance Learning and Family Connections Fund to help equip parents, students and teachers with high-quality tools and content for at home learning. In collaboration with more than 60 organizations, AT&T has reached over 196 million students, parents and educators with resources and programming. We also opened the ESCUELA+ channel and its content to all DIRECTV, DIRECTV GO and SKY Play customers in Argentina, Brazil, Chile, Colombia, Ecuador, Peru and Uruguay to support learning at home internationally.
- Providing students with a safe space to get online: In September 2020, Comcast announced a program to launch more than 1,000 Wi-Fi-connected “Lift Zones” in community centers across the United States. Working with its network of thousands of nonprofit partners and city leaders, Comcast is providing free Wi-Fi in facilities that it has identified to help students get online, participate in distance learning, and do their schoolwork. In 2021 alone, Comcast estimates students will

be able to complete more than 25 million hours of remote learning lessons to further address the “homework gap” at the hundreds of Lift Zone locations that have already opened or will open soon.

- Connecting low-income families to the power of the Internet: Since 2011, Comcast’s Internet Essentials program has helped connect more than 10 million low-income people to broadband Internet at home, most for the very first time. Internet Essentials offers low-cost, high-speed Internet service; multiple options to access free digital skills training in print, online, and in person; and the option to purchase a low-cost Internet-ready computer. The program is structured as a partnership between Comcast and tens of thousands of school districts, libraries, elected officials, and nonprofit community partners. During the COVID-19 pandemic, Comcast also launched the Internet Essentials Partnership Program, which provides the opportunity for school districts and other organizations to fund and quickly connect large numbers of students and families to broadband access at home.
- Skill building in Indonesia: In partnership with strategic Indonesian partners Gojek, Tokopedia, and Traveloka, Google is leading Bangkit — an initiative to launch a structured education program to produce high-caliber, technical talent in mobile development, cloud computing, and ML for world-class, Indonesian technology companies and startups.
- Impact Challenge in Central and Eastern Europe: In January 2021, Google launched an Impact Challenge initiative to distribute €2 million in grants to organizations that are working to bridge the social and digital divide to promote inclusive economic growth and recovery in Central and Eastern Europe.
- Equipping SMBs with Digital Skills: The ASEAN Coordinating Committee on Micro, Small and Medium Enterprises (ACCMSME) and The Asia Foundation came together to [launch](#) the [Go Digital ASEAN initiative](#). Supported by a \$3.3M grant from Google.org, the initiative is designed to equip micro and small enterprises as well as underemployed youth, particularly those in rural and isolated areas, with crucial digital skills and tools; expand economic opportunity across ASEAN Member States (AMS); and minimize the negative impact from the Covid-19 crisis.
- Providing a Lifeline to SMBs during COVID-19: Youth Business International is delivering a [Rapid Response and Recovery Programme](#), funded by Google.org, that backs underserved micro, small and medium-sized businesses, sustains livelihoods and supports communities across Europe, the Middle East, Africa and Asia Pacific. The program will be implemented in 32 countries and will focus on the most affected business owners, including young people (aged 18-35 years), women, and refugees and other migrants. Emergency support, including training through webinars and mentoring, will be provided to business owners through YBI’s global network of members and delivery partners. Google employees will volunteer their time to share their knowledge and expertise, helping business owners to upskill and adapt to the challenges they are facing.
- Connecting Native American communities to the Internet: [People Centered Internet](#) is a nonprofit promoting connectivity around the world, and Google has supported its efforts with Native American communities. In addition, Google directly supports [Tribal Digital Village](#) (focused on Native American connectivity in Southern California).

6. 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?

- We hope the WTDC-21 will culminate in a commitment to close the digital divide by 2030, or whenever delegates deem appropriate and feasible. Providing a specific date as part of a conference statement creates a sense of accountability by all signatories.
- The WTDC-21 should promote a formal mechanism or workstream to conceive of innovative approaches to financing as an essential complement to pledges to close the digital divide.
- We urge the development of a library or catalog of government programs, business initiatives, or public-private partnerships that could be accessed by developing countries and utilized as a model or tapped for digital skill development or guidance related to business or e-commerce activities.
- Women are the most productive and under-utilized segment of the global population. The WTDC-21 should include commitments by delegates to national, regional, and local initiatives aimed at bringing more women online as scientists, educators, businesspeople, and/or government leaders.

USCIB looks forward to supporting the efforts of the U.S. Government and other stakeholders at the WTDC-21. We urge that these efforts focus on advancing inclusive approaches to capacity building, and address challenges posed by the lack of sufficient innovation incentives and the absence of creative financing mechanisms. Most important, the ITU and member governments and sector members must expand collaboration with business and other stakeholders to realize developmental objectives.

Sincerely yours,



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