The USITUA is working to improve coordination and cooperation between the private sector and the U.S. Government to enhance U.S. effectiveness in the International Telecommunication Union (ITU).

USITUA
The United States
ITU Association

June 8, 2020

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

Dear Ms. Meacham:

The United States ITU Association (USITUA) is pleased to respond to NTIA's *Federal Register* Notice of May 8,[1] which seeks stakeholder input on proposals and positions for the 2020 World Telecommunication Standardization Assembly (WTSA-20).

Established in 2000, the USITUA is an open U.S. industry forum for the discussion of issues and the development of views and proposals on International Telecommunication Union (ITU) policy matters. Our membership is comprised of 63 U.S.-based corporations, associations and consultants, who share a vital interest in both policy matters before the ITU and the effective management of the Union.

WTSA-2020, currently scheduled for November 17-November 27 in Hyderabad, India, is of keen interest to our members as the Assembly will select the leadership of the ITU-T study groups and establish the ITU-T scope of work for the next four-year study cycle.

USITUA members participate in ITU-T study groups of interest to their companies. Having said that, we are concerned with varying ITU-T policymaking and standardization activities related to emerging digital technologies and services, such as Artificial Intelligence (AI), Over the Top (OTT), mobile/digital financial services and certain aspects of the Internet of Things (IoT). Specifically, we do not support ITU-T study groups being used to advance Recommendations unrelated to technical standardization, including policy issues such as privacy, taxation, and commercial practices, or technical standardization efforts outside the remit of the ITU-T.

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[1] Input on Proposals and Positions for the 2020 World Telecommunication Standardization Assembly, *Federal Register* Vol. 85, No. 90, May 8, 2020.

Additionally, we are concerned by the proposal for the ITU-T to work on top-down designs for replacing the Internet Protocol (IP) and related technologies. The proposals for "New IP"[2] and "future networking" enable more centralized control over network traffic, contradicting long-standing Internet architecture principles. Those principles underlie the global interoperability of the Internet and are derived from an open, bottom-up approach to standards development. The Internet Protocol and related technologies are the responsibility of the Internet Engineering Task Force, and their evolution should continue there.

We anticipate these and other issues will be topics of debate at the Assembly. USITUA appreciates the opportunity to share our views, priorities and recommendations on ITU-T study group mandates, ITU-T structure and the ITU-T's working methods with respect to WTSA-20.

ITU-T Study Group Mandates & Structure

- **Work programs of the ITU-T study groups must stay within the ITU-T's mandate; effective use of resources, including limiting duplicate efforts are key to success.**

The scope and mandate of ITU-T study groups should not be expanded by WTSA-20 to cover areas outside ITU-T's remit. Additionally, care must be taken to avoid duplication of work that is already being undertaken within other voluntary standards development organizations (SDOs) around the world that specialize in different technology areas. In response to NTIA's question as to what factors influence participation in ITU-T meetings, USITUA believes both U.S. and international industry prioritize standardization activities based on their commercial interests, including where standards can be most efficiently and effectively developed. For example, USITUA members engage in 3GPP, OMA (LwM2M), ISO/IEC JTC1, the IETF and other technology area focused industry-led organizations for standardization activities related to communications, IoT, cybersecurity, AI and others. Some USITUA members participate in ITU-T study groups working on these matters, such as the security-related work in ITU-T Study Group 17.

In addition to the duplication of work and related inefficiencies, this practice of expanding into areas beyond the ITU's remit also diverts limited ITU resources from supporting the core functions of the Union. Moreover, given our own resource constraints, the U.S. private sector cannot effectively engage in duplicative standards work across multiple SDOs. As a result, many ITU-T standards are developed without effective participation by U.S. industry.

We suggest that the new Study Questions for the next four-year period should require demonstrated support from a broad range of participants in order to lead to the generation of high-quality, relevant and timely international telecommunication/ICT standards that are not produced elsewhere. This can be achieved by ensuring that the ITU-T work program is widely relevant and not driven by proposals from a single source or very limited interest group.

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[2] "'New IP, Shaping Future Network': Propose to initiate the discussion of strategy transformation for ITU-T," Huawei, China Mobile Communications, China Unicom, Ministry of Industry and Information Technology, TSAG-C83, 232-27 September 2019.

We acknowledge that Member States have a variety of opinions about the ITU's mandate and expertise regarding emerging technologies. It is important, therefore, for the U.S. to ensure that the ITU-T's activities related to those new technologies do not expand into policy and commercial matters outside its mandate, as that would negatively impact the rollout of new services and undermine investments that are critical to making these services available to consumers around the world. Most recently, Study Group 3 has undertaken the development of recommendations on OTTs and continues to explore the possibility of developing rules for IoT global roaming and Internet peering and transit arrangements. USITUA members do not believe such policy and finance work items are appropriate or necessary. In addition to being duplicative, in some instances ITU-T work would conflict with successful and well-established industry best practices. For example, the GSMA has long had in place a framework for the commercial negotiation of IoT roaming arrangements which has helped support the global deployment of billions of IoT devices.

While some Member States seek to propose highly regulatory policy actions on these and other emerging topics, ongoing collaboration between the U.S. private sector and the United States government has been successful and has resulted in more balanced approaches that recognize the success of commercial agreements and enabling policy environments that support competition, innovation and investment. The U.S should anticipate renewed focus on these issues at WTSA-20 and in the next study period and USITUA recommends continued collaboration between the United States government and U.S private sector to reframe these problematic work items, as well as coordination with other ITU Member States.

Additionally, we recommend increased coordination with the ITU Telecommunication Development Sector (ITU-D), which has numerous work items underway on many of these policy questions. We also support the U.S. considering a longer-term plan for transitioning these policy-related work items from the ITU-T to the ITU-D, which provides a strong platform for the exchange of views and best practices among the membership.

In a similar vein, we also expect proposals to WTSA-20 for new Resolutions on OTTs and AI, among others, and proposals to modify existing Resolutions to take into account content, data protection and other policy areas far outside the ITU remit. These and other issues, including the "New IP" proposal, also may be advanced through inclusion in revisions to study group mandates agreed in WTSA Resolution 2 and in new and revised Questions. We urge the United States to be vigilant and steadfast in opposing these efforts.

In response to NTIA's question as to "what, if any, ITU recommendations are necessary to ensure a resilient, secure and diverse 5G supply chain," USITUA does not support this work to be undertaken in the ITU. The standardization of 5G is occurring in 3GPP. In addition, there are numerous efforts already underway that have promise to develop open and interoperable standards to enhance competition and diversity in the 5G supply chain. For example, the Open Radio Access Network Alliance (O-RAN) and the Telecom Infra Project (TIP) both are working on additional standards to ensure the development of open and interoperable interfaces in the Radio Access Network (RAN). There are hundreds of participating entities in TIP and currently 23 operators and 123 contributing members of the O-RAN Alliance all working toward open, interoperable interfaces in the RAN. Indeed, recently the O-RAN Alliance and TIP announced a

liaison agreement related to the development of open RAN solutions. In addition, the management and orchestration of these open networks is being developed in the Open Networking Automation Platform (ONAP) managed by the Linux Foundation. We also note the Open Radio Equipment Interface (ORI) which was standardized by the European Telecommunications Standards Institute (ETSI).

- **Structure of ITU-T Study Groups should enable efficient and timely standardization to meet the needs of its membership, taking into account the ITU Strategic and Financial Plans.**

The structure of the ITU-T study groups should be clear and take into account available budgetary resources and the priorities outlined in the Financial and Strategic Plans of the Union. The structure should be transparent, efficient and focus on the core competencies of the Sector. USITUA members generally support efforts to rationalize the study group structure in order to increase synergies, avoid duplication of work, support efficient standardization activities, enable the best use of the study group experts and to maximize participation of interested members. We urge that careful consideration be given to changes to the ITU-T structure to ensure that the progress of positive technical work advanced through U.S. and global cooperation, such as in Study Group 12, Study Group 15 and Study Group 16, is not impeded.

Working Methods

- **Work Items should reflect "bottom-up" membership-driven contributions and processes should be transparent and inclusive.**

WTSA-20 provides an opportunity to bring greater efficiency, transparency and inclusiveness to the ITU-T's work. Work items should reflect "bottom-up" membership-driven contributions and not the priorities of the ITU.

With regional groups of the ITU-T study groups playing an increasing role in defining the work of the parent study group and given the global nature of U.S. industry, it is imperative that the activities of these sub-groups are open and transparent. This is especially true with respect to the regional groups of Study Group 3, which have acted as a voting bloc to advance their respective priorities at the full study group level without regard for dissenting positions and input from other Member States or from industry. USITUA appreciates the U.S. government's attempts to ensure these groups observe the general principles of openness, transparency, and broad participation and view WTSA-20 as an opportunity to put forward proposals to modify the ITU-T working methods to clarify the scope of work and criteria for participation in regional groups of the ITU- T Study Groups.

We recognize that focus groups may serve as an effective and efficient mechanism to develop outputs in well-defined areas within a short period of time. However, the establishment of focus groups is occurring with greater frequency and some focus groups have undertaken work items that deviate from the intended scope of study and/or have established a longer-term presence.

We support efforts to strengthen the oversight of focus groups' scope and output, as part of a general effort to examine the creation and operation of ITU-T focus groups.

For the ITU-T to continue to meet the needs of its diverse membership, USITUA recommends the work of the Sector be guided by the following principles: i) study groups must be given sufficient time to consider all contributions within the scope of work, regardless of the source; ii) meetings of regional groups must be transparent and open to participation of ITU-T membership; iii) outputs from regional groups must be submitted to the parent study group for approval.
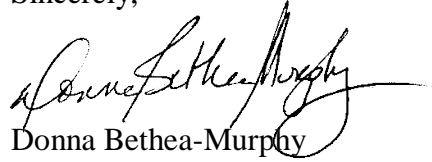
Recommendations and Conclusion

WTSA-20 provides an opportunity to help shape the ITU-T structure and work program into a disciplined, efficient and effective Sector that meets its membership's needs. We appreciate the importance the United States has placed on industry consultation and collaboration and we look forward to continued partnership on these and other ITU matters. We provide the following recommendations for the United States government to ensure successful results at WTSA-20.

- USITUA urges the United States to develop a long-term strategy to streamline a more efficient and effective ITU-T Sector. To achieve these objectives, we encourage the United States to engage early-on and frequently with the US private sector, with CITEL Member States and with other global partners. To help facilitate this outreach to developing countries, and particularly in Africa, we'd suggest exploring the potential to partner with the United States Telecommunication Training Institute (USSTI). It is also essential to understand the priorities of India, the WTSA-20 host country, and its vision of a successful assembly.

- More specifically, USITUA recommends:

  o The scope and mandate of study groups should not be expanded beyond the ITU-T's mandate. This will ensure an effective use of resources, including limiting duplicative study efforts.

  o The structure of ITU-T study groups should enable efficient and timely standardization needs of the ITU-T membership.

  o Work items should reflect "bottom-up" membership-driven contributions and ITU-T working methods should reflect transparent, inclusive and efficient processes.

In conclusion, following WTSA-20 the United States should review the newly approved ITU-T study group structure and study questions and map out a proactive plan for engagement in the Sector. USITUA would be pleased to contribute our views in such an exercise.

Thank you again for the opportunity to provide this input. USITUA looks forward to its ongoing collaboration and cooperation with NTIA and the entire U.S. government on these and other important issues at the ITU.

Sincerely,

Donna Bethea-Murphy