# International Telecommunication Union's (ITU)
# Plenipotentiary Conference 2022 (PP-22) Priorities
# September 12, 2022

The U.S. Council for International Business (USCIB)[1] holds in high value the work of the International Telecommunication Union (ITU) in promoting the rational use of radio spectrum, the development of international standards that promote the interoperability of telecommunication networks as well as delivering capacity-building programming to ensure that the global citizenry can reap the economic and societal benefits that come with access to telecommunication/ICTs and broadband connectivity. We welcome the opportunity presented by the Plenipotentiary Conference 2022 (PP) for Member States and Sector Members to reexamine the ITU's general policies, adopt the four-year strategic and financial plans, and elect the senior management team of the Union, the Member States of the Council, and the members of the Radio Regulations Board.

Decisions taken at PP-22 have the potential to significantly impact global business on both the technical and policy fronts. With that in mind, USCIB members have identified the following priority issues that will be discussed at the conference:

## Secretary-General of the ITU

The Plenipotentiary Conference elects the Secretary General and other important leadership posts. Under the rules laid out in the ITU Constitution, Houlin Zhao, the current ITU Secretary General, is required to step down this year after serving two consecutive four-year terms. Thus, the new ITU Secretary General will be chosen at the 2022 Plenipotentiary, September 26-October 14, in Bucharest, Romania.

### *USCIB Position:*

- USCIB was one of the first business organizations to join the U.S. Government in strongly endorsing the candidacy of Doreen Bogdan-Martin to become the new ITU Secretary General. By virtue of her current leadership of the ITU Development Bureau, we believe that Ms. Bogdan-Martin possesses both substantive knowledge and leadership skills that would make her a superb ITU Secretary General.

- We are confident she will place the Union at the forefront of global efforts to drive meaningful connectivity for the unconnected, broaden and deepen partnerships to accelerate digital transformation, and support greater organizational accountability.

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[1] 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. In particular, 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 2022 ITU Plenipotentiary.

**Policy Discussion Forums**
- Resolution 2 – Establishment of the World Telecommunication/Information and Communication Technology Policy Forum (WTPF)

*USCIB Position:*

- USCIB believes the WTPF can be a useful, periodic platform for the exchange of expertise between governments, business, the technical community, and civil society, which in turn, can help inform sound policymaking.
- We favor the inclusion of all stakeholders in the WTPF preparatory process and in the Forum itself deliberations.
- Given a very full event calendar as the ITU resumes the convening of global conferences post-COVID-19 and that the most recent WTPF was held in December 2021, USCIB believes that any decision to hold another WTPF should be decided by PP-26. This will enable the ITU to return to its typical "one conference per year" meeting schedule.

**Internet Technical and Economic Issues**
- Resolution 101 – Internet Protocol (IP)-based networks
- Resolution 133 – Role of Member States in the management of internationalized domain names
- Resolution 180 – Facilitating the Transition from IPv4 to IPv6

*USCIB Position:*

- Concerning the "economics" of the Internet, USCIB consistently has advocated for a market-based approach. Interconnection between or transit over IP networks and international Internet connectivity arrangements should continue to be negotiated commercially as this has enabled the global Internet to adapt quickly to market changes and innovations and meet consumer needs and evolving demands. The diversity of roles and interconnection, and payment options have been critical for the optimal functioning of the Internet ecosystem and the digital economy. Imposing regulated international settlement regimes will end up raising costs and lowering rates of development and investment, market-based proponents argued.

- USCIB further objects to any proposed revisions that would create new regulations governing the transmission of content over networks. We have repeatedly asserted that regulation of content is not within the remit of the ITU, which is a technical organization.

- Specific to Resolution 101, we believe the current text is sufficiently broad and flexible to address the range of issues and do not see the need for any modifications to the Resolution.

- With respect to IP addressing and capacity-building related to IPv6 deployment, we do not disagree that the ITU can continue to make important contributions in advising developing countries about transitioning to the new Internet protocol (IPv6). However, this advice and support should be coordinated with the Regional Internet Registries and as appropriate, with other UN entities, such as United Nations Educational, Scientific and Cultural Organization (UNESCO) or the United Nations Broadband Commission for Sustainable Development.

- Most important, with respect to Resolution 180, USCIB strongly opposes any efforts to utilize this or any other Resolution as a means of promoting the so-called "New IP" proposal. We note that this proposal has failed at the ITU-T Study Group level as well as at the World Telecommunication Standardization Assembly ([WTSA-20](#)) and World Telecommunication Development Conference ([WTDC-22](#)). We regard the drive for a New IP as an effort to utilize the ITU to advance certain technical leadership ambitions regardless of the fragmentation and confusion created by premature standardization as called for in these proposals. We reaffirm that it is not the ITU's role to impose a single technology or approach on a global scale.

## Internet Governance
- Resolution 102 – The ITU's role with respect to international public policy issues pertaining to the Internet and the management of Internet resources, including domain names and addresses.

### *USCIB Position:*

- We agree with the United States and other proponents of a multistakeholder Internet governance model and believe it is beyond the ITU's authority and expertise to assume a role in managing, coordinating, overseeing, or otherwise regulating the use of the Internet. Thus, USCIB supports efforts to emphasize the importance of multistakeholder engagement, including opening the Council Working Group on International Internet Public Policy to Sector Members, and elevating the reference to organizations involved in the technical aspects of the Internet (e.g., ICANN, IETF, RIRs) into the body of the Resolution.

## Cybersecurity
- Resolution 130 – ITU Role in Building Confidence and Security in the Use of ICTs

### *USCIB Position:*

- USCIB Members have consistently opposed efforts since PP-10 to establish the ITU as the overall manager of global cybersecurity. Differences in legal frameworks, cultures, and national/regional mores make a global agreement and attempts to impose world-wide legal, technical, and operational cybersecurity requirements virtually impossible. Moreover, such undoubtedly divisive efforts risked doing serious harm to international comity.
- The ITU should remain focused on cybersecurity capacity-building activities.
- In particular, we support the need for skills development in cybersecurity and bringing my gender balance to this important field.

## World Summit on the Information Society (WSIS)
- Resolution 140 – ITU's role in implementing WSIS Outcomes

### *USCIB Position:*

- USCIB supports updating Resolution 140 to ensure that the ITU supports the UN's WSIS +20 Overall Review in 2025.
- ITU should serve as the moderator/facilitator for Action Lines C2 (Information and communication infrastructure), C5 (Building confidence and security in the use of ICTs), C4

(Capacity Building) and C6 (Enabling environment) of the Tunis Agenda, and a potential partner for a number of other action lines, as identified by WSIS.

**International Telecommunication Regulation (ITRs)**
- Resolution 146 -- Periodic review and revision of the International Telecommunication Regulations (ITRs)

*USCIB Position:*

- USCIB supports discontinuing the Expert Group on the ITRs (EG-ITRs), while allowing for the periodic review of the ITRs on an as-needed basis through existing channels (*i.e.*, contributions from Member States and Sector Members to relevant study groups, sector advisory groups, and/or ITU Council). We do not support any efforts to establish a preparatory process for another World Conference on International Telecommunications (WCIT) to revise the ITRs.

**Child Online Protection (COP)**
- Resolution 179 -- ITU's role in child online protection

*USCIB Position:*

- USCIB supports the ITU's COP initiative as a platform to raise awareness and share best practices on child online safety issues. Further, the ITU should continue to assist and support Member States, especially developing countries, in developing and implementing roadmaps for the COP initiative as well as facilitate collaboration between all stakeholders involved in child online protection, together with relevant international organizations.
- USCIB opposes any textual revisions to Resolution 179 aimed at expanding the ITU's operational role beyond its primarily technical mandate.

**Space**
- Resolution 186 – Space Activities

  Over the last several years, companies around the world have ushered in a new era of space commerce. Key advancements include the deployment of satellite constellations in LEO and the planned launch of several others, which hold great promise for the future of global broadband connectivity. While advances in space commerce present opportunities for economic growth and technological advancement, they have also raised questions about the sustainability of the space environment and safe and secure operations in space, as well as other matters such as the impact of satellite constellations on astronomical observation.

  Brazil submitted a proposal to modify Resolution 186 ("Strengthening the role of ITU with regard to transparency, confidence-building and measures in outer space activities"). It seeks to expand the ITU's role on issues related to space safety and sustainability, causing an inefficient overlap between expert UN bodies, such as COPUOUS and UNOOSA.

- USCIB opposes changes to Resolution 186 to expand the ITU's remit over space safety and sustainability matters.

- The Committee on the Peaceful Uses of Outer Space (COPUOS) and the UN Office for Outer Space Affairs (UNOOSA) are already meaningfully addressing questions relating to current and future activities in space, including safe operations in orbit and space debris, among other topics. We encourage all ITU Member States to participate in the work of these bodies, including by joining COPUOS, as appropriate, to ensure that their voices are heard on these important topics.

- The ITU already has existing and well-functioning liaisons and reporting mechanisms with these bodies, which obviates the need for additional agreements.

- We believe that expanding the ITU's remit to include space safety and sustainability issues will create an inefficient redundancy within the UN system by duplicating the role of organizations, including COPUOS and UNOOSA.

- Expanding the ITU's remit to include space safety and sustainability would necessarily entail a substantial commitment of resources that would be better applied toward the union's primary goal of expanding global connectivity.

## Internet of Things (IoT)
- Resolution 197 – Conformance and interoperability

  Some ITU members have pressed for changes to Resolution 197 that would be aimed at regulating and/or standardizing IoT to improve interoperability and expand the use of this technology in Smart City or other applications, especially in developing countries. Resolution 197 currently calls for pilot projects aimed at ensuring conformity to ITU recommendations to increase the probability of interoperability, improvements in standards-setting processes to improve interoperability, and support for the capacity-building programs of developing countries, among other provisions.

*USCIB Position:*

- USCIB supports efforts to highlight the role of IoT solutions in helping to achieve the SDGs and respond to natural disasters and pandemics, as well as the importance of ITU collaboration with other organizations involved in IoT standards development. We also support calls for increased capacity building for developing countries. While we recognize the importance of the security-related aspects of IoT, we believe specifics to cybersecurity are best addressed in Resolution 130.

## Resolution Focused on Over the Top (OTT) Providers
- Resolution 206 – Consideration of the economics and regulatory impact of the Internet, convergence (services or infrastructure), and new services, such as over-the-top (OTT), on international telecommunication services and networks

- USCIB has consistently advocated against changes to Resolution 206 that would prematurely regulate and/or standardize Over-the-Top (OTT) applications on the grounds that such actions risk hampering the innovative potential of such applications. For this reason, we do not support any changes to Resolution 206.

**Possible New Resolutions:**

1. Regulation of Artificial Intelligence (AI) – For the past few years, support has been building among some members to bring regulation of AI under the ITU's purview.

*USCIB Position:*

- USCIB is wary of efforts to expand the ITU work program to include AI and other emerging technologies on the grounds that, if not properly scoped, the policy outcomes could stifle innovation and not be technology neutral.

- In addition, USCIB is concerned that expanding the ITU work program to include AI risks being wastefully duplicative – especially in view of the extensive work undertaken by the OECD on AI, which culminated in the OECD Council's approval in May 2019 of the [AI Principles](#). The OECD's AI Principles have been applauded by stakeholders the world over as setting forth non-binding standards for AI stewardship that are practical and flexible to accommodate ever-evolving changes to the technology. Equally important, the OECD AI Principles were grounded in expert, comprehensive economic and technical analysis that was informed by stakeholders from business, the technical community, government, and civil society.

- We further worry that the ITU does not possess in-house expertise, personnel, and resources to meet the very high standard set by the OECD and its members in developing the AI Principles and the online [AI Observatory](#). USCIB, therefore, is not confident that the ITU's standardization work on AI would be grounded in research and analysis that is as solid as that undertaken by the OECD.

- By the same token, we recognize the keen interest of the ITU and some of its members in AI in view of the rapid pace of its development. Thus, we would support a new Resolution to address the growing, widespread interest in the application of AI studies within the ITU. We support channeling this interest to examine how the application of AI to telecommunications/ICTs has the potential to make telecommunications/ICTs more efficient and to facilitate universal access to telecommunications/ ICTs while the ITU's work related to AI should remain within the mandate and core competencies of the Union related to telecommunications/ICTs.

2. Disaggregated and Open Interoperable Networks, including Open Radio Access Networks (O-RAN) – O-RAN refers to industry-wide standards for RAN (Radio Access Network) interfaces that support interoperability between vendor equipment and may offer network flexibility at a lower cost and is a topic of growing interest among ITU Member States.

- USCIB members are concerned that a new Resolution on this topic could result in duplication of technical work already underway in other industry-led fora and stifle innovation. USCIB supports efforts, particularly through the ITU-D, for the exchange of information on and raising awareness of disaggregated and open, interoperable networks as agreed at WTDC-22. However, we do not support ITU standards or policy-related activities in this area.

3. <u>Encouraging the Participation of Industry in ITU Work</u> –We anticipate proposals for a new Resolution that is premised on the importance of strengthening symmetries between Member States and business stakeholders to ensure that all points of view are considered in the work of the ITU.

*USCIB Position:*

- USCIB supports this proposal, recognizing the importance of enabling participation of business and other stakeholders in the ITU's work to ensure that it is informed by the requisite technical expertise and is commercially viable.