

James Gannon
james@cyberinvasion.net

Via email WTSA2016@ntia.doc.gov

I would like to thank the NTIA for its request for the public to comment on the upcoming WTSA and the work of ITU-T in general.

As an interested party involved in various SDO's and matters of internet governance I feel that it is critical that the input of a broad range of actors is taken into account at the WTSA and in the continuing work of ITU-T over the coming 4 years.

As a cybersecurity consultant with a number of years of experience in protecting critical industry and ensuring that we have a secure, stable and resilient internet my comments will focus on the aspects that I feel need to be addressed in that context.

Question	Response
(1) Are there overarching objectives and priorities that the U.S. delegation should adopt for WTSA-2016 and the ITU-T? What is the best way for the U.S. delegation to advance and ultimately achieve these objectives and priorities?	The evolution of the ITU-T into a more relevant, more open and participatory forum for development.
(2) In an environment with a wide range of industry led, multistakeholder standards development organization (SDOs) leading the development of telecommunications and information standards, does an intergovernmental organization, such as the ITU, provide any unique value? How does ITU involvement in global standards development influence, or affect U.S. industry interests in engaging in and promoting the international digital economy?	In a private sector led area such as within the remit of the ITU-T there needs to be a recognition of the role of an IGO such as the ITU in bringing governments from developing and LDC's into the area of cooperative standards development. However that role should recognise that the majority of standards should and must be private sector led and will likely exist outside of the ITU. The ITU should not seek to replace or disrupt the continued development of multi stakeholder mechanisms for standards development or management of certain critical resources.

	<p>Given the limited involvement of private sector actors in the ITU it must be recognised that any development taking place within the ITU sphere may not be taking advantage of the full range of expertise and inputs that is required for cohesive and comprehensive standards development. Due to this lack of broad consultation and involvement of a wide range of actors including private sector and civil society there is a risk that the work of the SGs cannot be considered complete or comprehensive in its final deliberation.</p>
<p>(3) What do you believe is the percentage of participation of relevant organizations or companies in the ITU-T study groups? What is the value of this participation in the ITU-T study groups? Does this participation meeting the needs of relevant organizations or companies?</p>	<p>The participation rate of interested parties in the SG's at the ITU-T is extremely unrepresentative of the broader market in which the SGs intend to develop.</p> <p>The barriers to entry to sector membership for SME's, enterprises in which the ITU's remit is not a core concern, or civil society actors is of serious concern and requires reevaluation for the ITU SGs to remain useful and relevant to a modern multifaceted market environment.</p> <p>The risk of a standards development organisation existing without the relevant expertise and inputs from all interested and impacted actors should be taken into consideration during the WTSA.</p>
<p>(4) Is there a wide implementation of the ITU-T recommendations in the United States or elsewhere by relevant organizations or companies? Why or why not? Can you provide examples of these implementations, if any?</p>	<p>The ITU-T G, H and X series recommendations are often used as a basis for aspects of technology development however given that these are a limited subset of the overall remit of ITU-T (Recommendations span A-Z) it can be considered that outside of these niche cases the ITU-T recommendations are not in extensive use as baselines but rather as potential references in certain situations.</p>

(5) The WTSA-12 Action Plan (see <https://www.ntia.doc.gov/files/ntia/WTSA16/WTSA-12-Action-Plan.pdf>) identified issues that will be discussed during WTSA-2016. Which of these issues are the most important to focus on in the upcoming WTSA-2016? What positions should be taken with respect to these issues?

- The positioning and strategy of both the ITU-T and the SGs is of critical importance given the rapid development of this area in the last decade.
 - The delegation should consider the ability of the ITU-T to be responsive to a modern arena of SDOs and evaluate its appropriate role within that matrix of organisations.
- Review and evolution of the model of work and the increased involvement of non-nation state actors in the work of the ITU-T.
 - The delegation should consider adopting a position of increased openness and transparency in the work of the ITU-T and the SGs
 - Ability for experts and non-sector members to participate in the SGs is of critical importance
 - Ensuring that the SGs are effective and functional in the current private sector led international marketplace.
- Country code top level domains
 - Care should be taken to ensure that the roles of the ITU and ICANN are not blurred or confused where appropriate.
- Cybersecurity
 - The ability for SG17 to perform a useful and impactful contribution to the cybersecurity ecosystem should be evaluated and structured accordingly.
 - Speaking as an interested party who would welcome the ability to participate in SG17, evaluating the ability for non-sector members to participate in SG-17 and

	other SG's
<p>(6) Are the ITU-T work methods and/or rules of procedure effective? Why or why not? What, if any, modifications to ITU-T Resolutions and Recommendations (see https://www.ntia.doc.gov/page/wtsa-12-resolutions-and-opinions) or to the ITU-T working methods or rules of procedure would you recommend to improve efficiency and effectiveness? Are there structural changes to the ITU-T that could make the organization more relevant?</p>	<p>The ITU-T SGs are not being utilised to their greatest potential due to the limited involvement of non-state actors excepting a small range of sector members. Serious consideration should be given to allowing broader and more open participation in the ITU process if it is to remain relevant in the overall ecosystem of an increasingly multistakeholder SDO landscape.</p> <p>A move to a more open process would not only make the work of the ITU-T more relevant to private industry but would allow a deeper understanding of the issues under study to be performed.</p> <p>This matter should be a key focal point of the WTSA.</p>
<p>(7) What are the most important international standardization public policy issues and topics? And why? In what areas or subjects do you believe the ITU-T has a particular role or expertise?</p>	<p>The ITU-T has an opportunity to be the aggregation point for developing nations in developing their policy and standardisation activities, guiding them on the work of other SDOs and introducing traditional monopoly telecoms markets to the multistakeholder model of standards development, this is not a role that the ITU traditionally has taken but one that it is uniquely positioned to take moving forward.</p>
<p>(8) Assuming the ITU-T study group structure remains as it is today, in which study groups and activities should NTIA prioritize its participation and why?</p>	<p>SG 2,3,17 and 20 given their applicability to modern telecoms.</p>
<p>(9) How could cooperation and collaboration between ITU-T and other SDOs be strengthened? How could cooperation and collaboration among the three ITU sectors be strengthened?</p>	<p>An evaluation of the working methods of the liasons, the ability for non-nation state or sector members to participate and a recognition of the need for the ITU to evolve in a rapidly changing ecosystem will bring great advances to the collaboration aspects, the ITU has a role to play in the overall ecosystem and its important to assess what that role is and where it sits in the evolution of standards development</p>

	worldwide.
(10) The ITU and its membership have identified a standardization gap between developed and developing countries and a need to bridge that gap to ensure greater participation by all countries in the work of the ITU-T. What is the best way to address this gap? Would ITU programs on this topic be better placed within the ITU-D or the ITU-T? What other steps can be taken to bridge this gap?	As noted above the ability for the ITU-T to act as a focal point of information sharing, collaboration and connecting LDCs and Developing countries to the SDO ecosystem is critical. This will come hand in hand with an evaluation of the working methods of the SGs and the ability for a broader range of actors to participate in the ITU-T.

Please continue to involve all interested parties as we move forward, the ability for us all to work together is a cornerstone to the development of a health ecosystem, indeed I would suggest that NTIA attempt to convene some discussion groups around the topics that will be discussed at the WTSA to ensure that a fully informed and briefed delegation extracts the maximum value from the WTSA.

Regards,

James Gannon