GSMA Response to NTIA's Request for Input on Proposals and Positions for 2016 World Telecommunication Standardization Assembly

16 June 2016

The GSMA represents the interests of mobile operators worldwide, uniting nearly 800 operators with more than 250 companies in the broader mobile ecosystem, including handset and device makers, software companies, equipment providers and Internet companies, as well as organisations in adjacent industry sectors. The GSMA also produces industry-leading events such as Mobile World Congress, Mobile World Congress Shanghai and the Mobile 360 Series conferences.

The GSMA welcomes the opportunity to respond to the National Telecommunications and Information Administration, U.S. Department of Commerce's questions concerning the upcoming World Telecommunications Standardisation Assembly 2016.

Overall, the GSMA has considerable concerns about the administration and working methods of ITU-T Study Groups. In recent years, the GSMA and its members have seen a substantial change in the administration and processes of the ITU-T Study Groups. In particular, we have the impression that Study Groups are run on the basis of advancing the agenda of the ITU itself and not of the Member States, Sector Members or Academic Members of the ITU-T. In particular, work of several Study Groups continues to be driven by regional Study Groups which form regional voting blocks that advance ITU priorities without regard for dissenting positions and input from other Member States or from industry.

Currently, the GSMA sees very few GSMA member operators and very few industry members overall participate in these Study Groups, either as ITU-T Sector Members or on national delegations. Many operators have cancelled their Sector Memberships as they see some ITU-T activities as increasingly irrelevant. Although there are some ITU-T Study Groups where industry is able to constructively participate in the telecommunications standardization process, private sector participation in certain Study Groups, when it does occur, is usually aimed at minimising or preventing harmful proposals becoming ITU-T Recommendations. So, in effect, the purpose of attending certain ITU-T Study Groups is to limit the potential damage of work items and outputs rather than to contribute to work items more constructively. For standards related to emerging services and technologies, GSMA members generally are much more active in other standards organisations that they see as more open, agile and relevant to their business than the ITU-T. These include, among others, the IETF, ETSI, 3GPP and W3C.

As a result of the change in processes which favour ITU institutional aims, we believe that the goal of the US at the WTSA-16 should be to ensure that the remit of the ITU-T remains focused on

international telecommunications issues. Additionally, the US should focus on addressing the following systemic issues:

- ITU-T should adhere to all of its documented and binding rules and procedures, including the ITU Constitution and the WTSA-12 outcome documents. Clear communication on changes to policies and procedures, including meeting times and locations, is essential.
- ITU should support open dialogue between governments, industry and other stakeholders. This means ITU-T should allow all of its Member States, Sector Members and Associate Members to participate in all working group meetings, including regional Study Group meetings and regional workshops.
- All proposed and current work in ITU-T Study Groups should undergo a comprehensive and rigorous GAP analysis in order to avoid duplication with other standards bodies and working groups. Requests and responses to ITU-T Liaison Statements are not alone sufficient to determine whether there are standardisation duplications. Where industry and other responses to Liaison Statements indicate that duplicative work is already being undertaken elsewhere, this should be acknowledged by the working group and acted upon, rather than simply being noted.
- ITU-T outputs should be technology neutral and allow for any and all possible technology solutions to be used as a part of a framework. Specifically, we have objections to the ITU's current push of the Digital Object Architecture (DOA) as the only technology for object identifiers.
- If there isn't sufficient interest in work items within specific questions in ITU-T Study Groups, termination of the question or work items should take place in order to streamline work within Study Groups.
- ITU's measurement of the success of a Study Group by the quantity (rather than the quality or the necessity) of its outputs, as discussed within TSAG, should be discontinued.
- All meeting reports and output documents must accurately reflect the discussions that have taken place and the agreed outcomes.

Study Groups that are of particular interest to the GSMA and its members are Study Group 3 on Economic and Policy issues, Study Group 11 on protocols and test specifications and Study Group 20 on Internet of Things. The GSMA also participates in Study Groups 2, 5, and 17 on operational aspects, environment and security respectively. Of particular concern to the GSMA is the work on mobile money in SG 3. Prescriptive Recommendations on regulatory aspects of mobile money deployment and use could stifle a growing market which enables many who are currently unbanked to participate in economic exchange. It is likely that if mobile money rate setting becomes an ITU-T Recommendation, it will be adopted in countries which have growing mobile money markets. As a result GSMA members could be forced to pull out of those markets because the slow returns on capex for mobile money services and the ongoing opex costs would not be sustainable. Mobile money is not in the remit of ITU work. Participating in a mobile money market is typically regulated in-country by the banking or financial services authorities. As any potential Recommendations coming out of the ITU-T would involve financial services, this means that the ITU would be involved in financial service regulation. The ITU also does not have the remit or institutional expertise to undertake work involving financial regulation.

Additionally, the GSMA and its members are concerned about the duplication of work. In ITU-T Study Groups, work on a variety of topics including mobile spam, mobile network security, and Internet of Things is already happening across working groups in other fora including the GSMA and 3GPP. For example, the GSMA recently released its IoT Security Guidelines; this was noted in a Liaison Statement response to the ITU, but not taken into account as a reason for ITU not to undertake duplicative work itself. The ITU should recognise that, given current resource constraints, it is highly challenging for industry (and governments) to participate actively in multiple fora undertaking the same work.

Finally, the GSMA is highly concerned about the ITU-T introducing and managing a new counterfeit database which, in effect, will replace the GSMA's IMEI database and use a proprietary technology; this approach is not appropriate for a technology neutral UN institution. Work continues apace in SG 11 on a counterfeit database, so much so that the editors of a recent SG 11 rapporteur's group meeting have produced a draft text for a new resolution to be introduced at the WTSA-16. Though the GSMA has responded to numerous Liaison Statements on the issue, they have not been taken into account and work has moved forward in ITU regardless.

So, in conclusion we encourage the US to seek ways in which to ensure more streamlined and effective working methods for the ITU-T and its Study Groups in particular, without duplication of work with other standards organisations. This, in effect, would mean that ITU-T should undertake far fewer work items and be more effective in these more limited work areas. Additionally, in terms of a number of issues, including bridging the standardisation gap, the ITU-D is better suited to engage in capacity building and best practice activities. This is a more productive approach than producing Recommendations in ITU-T that are not widely supported as global norms and only half of the ITU membership are likely to use.