



June 17, 2021

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

Via WTDC@ntia.gov

RE: Comments on Connecting the Unconnected Worldwide in Light of the ITU's WTDC-21

Dear Sir or Madam:

American Tower appreciates the opportunity to provide input as the United States prepares for the International Telecommunication Union (ITU) World Telecommunication Development Conference (WTDC-21). WTDC-21 will set the priorities and activities for the ITU Telecommunication Development Sector in areas such as connectivity and digital inclusion.

American Tower is headquartered in Boston, Massachusetts, and is a leader in the wireless communications infrastructure industry. We provide one of the world's largest and most effective and efficient real estate networks for cellular and wireless, radio and television broadcast, microwave and two-way radio communications equipment. Our wireless infrastructure network is essential to billions of consumers and businesses in the United States and in 23 countries around the world, helping to increase mobile coverage and capacity.

The Request for Public Comment encouraged input on one or more of an expansive set of questions related to strengthening open, inclusive and secure digital ecosystems aligned with U.S. values. In this submission, we put forward specific suggestions of how the United States can demonstrate its leadership in improving global connectivity and ensuring its benefits are inclusive.

First, the United States can present a bold vision for how the ICT sector can improve lives while delivering positive economic outcomes. Second, the United States can offer capacity building to developing countries to help them shape policy frameworks that will support the buildout of resilient, green and affordable telecommunications infrastructure. Finally, the U.S. government can help facilitate partnerships to leverage this infrastructure for maximum impact. Our submission addresses each of these areas in turn.



Office of International Affairs
Page 2

Bold Vision for the ICT Sector

ICTs are the backbone of the digital economy, which holds enormous promise not only for advanced economies, but also for developing countries. Extending connectivity to rural and remote areas and increasing the resilience of urban networks directly impacts economic growth and social development, as aligned with the 2030 Sustainable Development Agenda. We also know that COVID-19 has underscored the importance of a well-performing telecommunication sector to facilitate telework, remote education and telehealth in a crisis environment and beyond.

A healthy ICT sector can provide the connectivity to support business needs, including large industrial centers and small factories, smart logistics and other use cases, and support entrepreneurship by allowing individual business owners to connect with the digital economy. Advancements in ICT can also reduce rural poverty through connecting remote areas, improving health and education services, and introducing smart agriculture. In addition, greater national telecommunications infrastructure coverage may drive higher levels of inbound foreign investment where investors require such coverage.

A bold vision for the sector, however, must rest not only on the quantity of connectivity but also on its inclusive quality; not just on the building of telecommunications infrastructure, but how it is built.

We must strive, for example, to **promote the wider use of digital technologies across socio-economic, gender, racial and other divides** through policies and programs to upgrade digital skills and facilitate the formal recognition of skills acquired online or through vocational training.

The ITU has had a significant focus on tackling the digital gender divide. To help generate opportunities for women and girls to use ICTs to increase their employability and enhance access to education, health and financial services, the U.S. government should ensure that the Addis Ababa declaration at WTDC-21 presents a compelling case for the value of addressing inequalities in digital connection due to gender and contains explicit reference to equipping girls with digital skills. This may require calls for stepped-up collection of sex-disaggregated data on digital access, greater investment in ongoing capacity-building activities and wrap-around government policies and strategic communications to tackle stereotypes about digital skills being for boys and men.



Office of International Affairs
Page 3

Similarly, the U.S. government should ensure that the Addis Ababa declaration shines a spotlight on **green, sustainable ICT investment and business models that deliver impact at lower cost and with a reduced environmental impact**. Tower sharing, also known as a neutral host model or collocation, reduces the time and cost to bring connectivity to rural areas, as

operators share infrastructure rather than invest the resources to build it themselves. Rural neutral host models are inherently green given the reduced footprint of shared infrastructure, rationalization of power supply and avoidance of overlapping buildouts. Hosting multiple tenants on a single macro tower is also more appealing to local communities than erecting multiple towers to host individual providers' antennas, and competition is preserved as operators may have different lease arrangements and coverage strategies.

Finally, we must focus on the **timeliness of infrastructure buildout**, as connectivity delayed is connectivity denied. As laid out further below, we need domestic regulatory processes and foreign investment review protocols that do not result in unnecessary delays in the deployment of much-needed infrastructure.

Capacity Building on ICT Policy Frameworks that Support Development Interests

As the United States considers its priorities in the run-up to WTDC-21, we recommend a focus on capacity building for countries developing their domestic telecommunications infrastructure policies. With its transparent regulatory framework and tradition of robust stakeholder input, the United States has an opportunity to model best practices before developing countries that have yet to develop the policy framework to govern their telecommunications sectors.

American Tower has had a positive experience with capacity-building programs with India in recent years. We partnered with the US -India CEO Forum, Business Council for International Understanding (BCIU) and Confederation of Indian Industries (CII) to twice host government-to-government best practices workshops in multiple cities to support the Indian Department of Telecom in the shaping of its infrastructure siting guidelines. The Federal Communications Commission and NTIA's participation in these Forums, along with the U.S. Embassy's leadership, were critical components to the meaningful outcomes.

Although not a comprehensive list, the following are areas where developing country officials may benefit from education and capacity-building efforts to foster a healthy telecommunication sector that can deliver inclusive benefits.



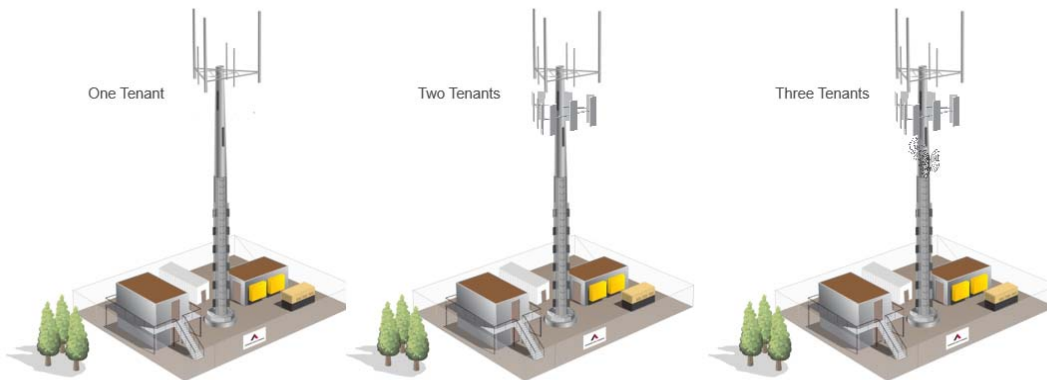
Office of International Affairs
Page 4

Tower Infrastructure Sharing: Companies like American Tower lease space on their towers to multiple mobile network operators (“MNOs”), who place their equipment on the towers to serve their own customers. Network development costs represent a large portion of MNOs’ capital investments. Utilizing third-party infrastructure rather than constructing towers facilitates cost- and technology-efficient network deployments while allowing operators to focus more on the continued growth and evolution of their networks. This shared infrastructure model enables MNOs to deploy networks faster across more geographies, enhances network coverage and capacity and promotes reduced environmental impacts given infrastructure is being shared by multiple parties. Without comprehensive policies with clearly established

directives encouraging the shared use of communications infrastructure, specifically that of neutral-host independent providers, countries may resort to suboptimal network deployment strategies. In turn, this may limit the socio-economic benefits the sector can deliver while also unnecessarily increasing its environmental impact.

The Tower Industry – Collocation

American Tower hosts equipment from multiple service providers at a single tower site— called “collocation”— which allows wireless service providers to offload capital-intensive infrastructure costs and instead concentrate on their core competency as service providers. This neutral host model is also more environmental and efficient.



Regulatory Frameworks to Facilitate Infrastructure Deployment: A thriving telecommunications infrastructure sector relies on a policy framework developed through open processes and robust stakeholder input. Regulatory systems can either act as barriers to or facilitators of successful infrastructure deployment.



Office of International Affairs
Page 5

To accelerate deployment, policies should support streamlined processes and coordination of permitting policies among regional, municipal and community authorities. Multiple authorities involved at different levels of government can act as barriers for new communication infrastructure rollout, while a central authority or “**one-stop-shop**” to manage all planning and construction-related activities would reduce delays. The neutral host model helps support new build efficiencies as tower companies must negotiate access only once.

In its report, [Enhancing Economic Performance and Well-Being in Chile: Policy Actions for a More Dynamic Telecommunication Sector](#), the OECD offers recommended practices for telecom sector regulation, which can help inform U.S. government capacity-building efforts in these areas. Among its recommendations are to:

- Establish an independent, arms-length economic and technical regulator for the telecommunication sector;
- Eliminate high fees for cellular site infrastructure deployment to facilitate market entry;
- Create mechanisms through which operators can file appeals against decisions by municipal authorities regarding infrastructure deployment permits or where they can identify infrastructure deployment barriers; and
- Oblige municipal authorities to share land registry information regarding preferential zones for infrastructure deployment with national authorities and create national inventories of state assets that can be used for communication infrastructure deployment.

We applaud the ITU for the organization of the Global Symposium for Regulators (GSR), including the Industry Advisory Group on Development Issues (IAGDI) to assist in coordinating development priorities and addressing regulatory barriers. We also see value in continuing the ITU’s [Global Network Resiliency Platform](#) (#REG4COVID), where ICT regulators and policymakers from all regions of the world may share best practices and lessons learned to strengthen network resiliency. Finally, we appreciate the [Global Symposium for Regulators \(GSR\) 2020 Best Practice Guidelines: The gold standard for digital regulation](#), which supports best practices such as integrating sustainability into regulatory frameworks, open and transparent regulatory processes, and evidence-based approaches.

Universal Service Fund Management: Universal Service Fund (USF) management is a core area where developing country officials may benefit from capacity-building efforts. USFs are designed to fund projects to expand coverage and access in underserved areas.



Office of International Affairs

Page 6

In Kenya, for example, the Kenyan Communication Authority (CA) and USF have held tenders through which they award bidding infrastructure providers subsidies to support the rollout of passive infrastructure. Earlier this year, CA awarded contracts to five companies, including American Tower, to roll out mobile network infrastructure in unserved and underserved parts of the country. The example provides a useful reminder that people living in rural areas in the developing world generally have less access to fixed broadband and rely predominantly on mobile to access the Internet. Wireless mobile networks are a less expensive, more efficient way to address the coverage and access divide.

Developing country officials may benefit from a better understanding of such opportunities to mobilize funds to expand connectivity, and from guidance on how to design the legal and regulatory framework for USFs so they are transparent, flexible and technologically neutral. The United States should work to ensure that the Addis Ababa declaration contains explicit reference to the need to increase USF efficiencies and mobilize available funds to support the deployment of telecom infrastructure.

Removal of Foreign Investment Barriers: Some developing countries maintain foreign ownership restrictions on telecommunications infrastructure and service providers. Relaxation or elimination of such restrictions, as we have recently seen in Indonesia, for example, allows U.S. investors to raise their equity stake or make an initial entry into a market, helping to meet a developing economy's growing digital infrastructure needs. Processes for foreign investment reviews and approvals should be efficient, transparent, and include clear timelines.

As it advocates for such market opening measures, the U.S. government should also ensure that commercial and economic officers at U.S. Embassies and consulates around the world play an enhanced role in facilitating dialogue between U.S. investors and host country officials ahead of market entry.

Facilitating Partnerships that Leverage Infrastructure for Impact

American Tower's Digital Communities program demonstrates how we bring to life our commitment to enabling mobile connectivity around the world. Below we share some observations from our program experience that may offer suggestions for U.S. government activities over the coming period.

The Digital Communities program recognizes that the reach of connectivity remains limited in many countries due to cost, scalability, power outages and educational barriers. To help overcome these limitations, we use the uninterrupted power supply and broadband connection



Office of International Affairs
Page 7

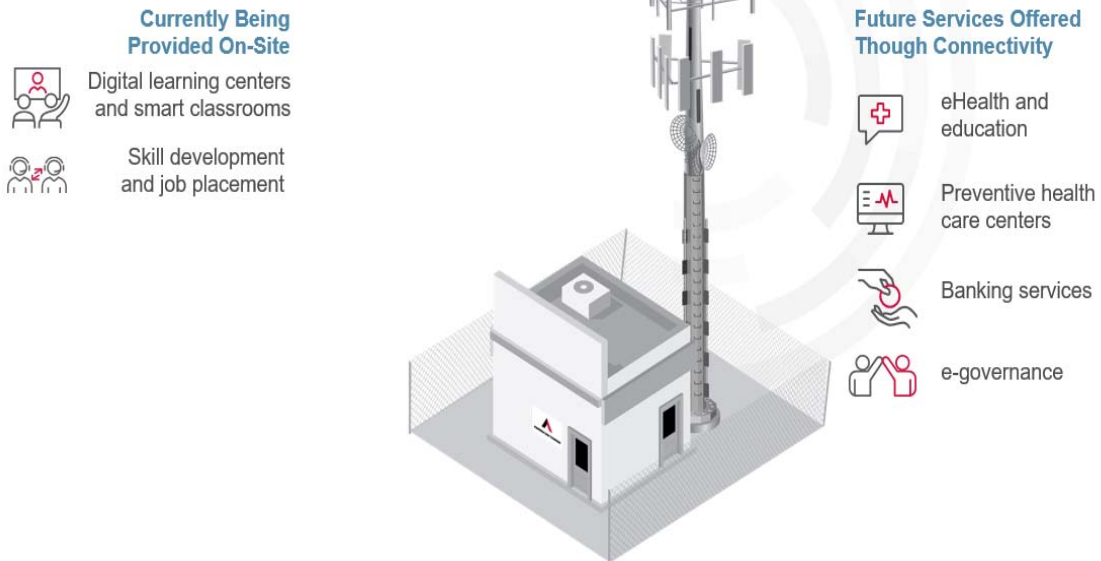
from our nearby tower sites and other innovative technologies to provide local communities with free ICT education and training to help create digitally empowered societies.

Since the inception of the program, which is now operating on three continents, over 128,000 students have enrolled in our learning centers and over 116,000 have received digital skills certifications. These certifications enhance employability and entrepreneurship opportunities, and better position individuals to access information, e-government services and other online resources. We are proud that the program was recently awarded the United Nations World Summit on the Information Society Prize 2021 in the “International and Regional Cooperation” category for innovative use of ICTs to advance sustainable development.

American Tower has committed to grow the Digital Communities program from 280 sites today to 2,000 sites over the next five years. Working together with like-minded partners across multiple sectors, we hope to introduce a range of digitally enabled services, allowing users to expand their horizons through technology. We would like to see industry achieve thousands of such communities in the near future.

Below we outline select learnings from our work building Digital Communities, including thoughts on the role the U.S. government could play in catalyzing these and similar efforts.

Digital Community Concept





Office of International Affairs
Page 8

Digital Communities Program Learnings and Recommendations for the U.S. Government:

- Importance of Partnerships: Building digital ecosystems involves partnerships with wireless carriers, technology partners and nonprofits to bring transformational connectivity opportunities like education and healthcare to communities in need. In Nigeria, for example, where we have 64 Digital Communities across 25 states, we deliver digital training and education together with partners such as IBM, the Lagos State Employment Trust Fund and Ondo State Ministry of Science and Technology.
 - The U.S. Government could play a convening role in priority countries to bring together public and private actors at the sub-federal level and facilitate relationship- and partnership-building activities specifically focused on digital ecosystems.

- Templates for Cross-Sectoral Approaches: Partnerships to deliver a wide array of Internet-enabled services, such as e-health, e-government and e-banking, involve conversations among leaders from varied sectors who might not normally interact with each other. Even in scenarios where the partners share a common end goal, agreeing on what is needed can consume time and delay action.
 - The U.S. Government could play a helpful role by mapping out the value chains for delivery of core services.
 - Which sector players must come together and what barriers must they address to deliver e-health in a rural community? What are the ingredients of an effective e-banking platform for an underserved community that relies on Internet access? What combination of resources must be assembled to deliver e-learning that meets the needs of a remote community?
 - By creating templates for successful digital ecosystems, the U.S. Government could help define needs up front, show what is possible and allow potential partners to more quickly advance to discussions of who is best placed to address which needs.



Office of International Affairs
Page 9

- U.S. Embassy / USAID Mission Support: Often companies have resources in a developing country market – towers, hospital beds, transport vehicles, etc. – and want to know how they could put these resources to use in a worthwhile project. They might communicate with the U.S. Embassy in a country, which would readily connect them with the USAID mission. However, at the country level, USAID programs are specific to aid-related outcomes, with global health, for example, being a major focus. ICT is considered an input, not its own pillar.
 - Given the enabling power of ICTs and telecommunications infrastructure, the U.S. Government could consider adding an ICT resource within select USAID missions in recognition of the critical development goals such assets may advance.

Thank you for the opportunity to provide comments, and for the leadership role NTIA and the U.S. Department of Commerce play in supporting and promoting American telecommunications services. As described in this submission, we see opportunities for NTIA to continue to demonstrate U.S. leadership in connecting the unconnected by defining a bold vision for a more connected world, supporting best-in-class telecommunications policy frameworks in the developing world and kickstarting new partnerships that bring together the best of American industry with on-the-ground partners.

Thank you for your time and attention.

Sincerely,

A handwritten signature in black ink that reads 'Becca Gould'.

Becca Gould
Senior Vice President, Public Affairs
American Tower Corporation

Cc: Aimee Meacham, Office of International Affairs, National Telecommunications and Information Administration