The American Registry for Internet Numbers (ARIN) provides services related to the technical coordination and management of Internet number resources. The ARIN region includes Canada, many Caribbean and North Atlantic Islands and the United States.

ARIN welcomes the opportunity to respond to the National Telecommunications and Information Administration, U. S. Department of Commerce's Request for Comments regarding the International Telecommunication Union upcoming World Telecommunication Standardization Assembly 2016.

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(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?

At this time, ARIN does not have any comment regarding overarching objectives or priorities for WTSA-16.

(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?

With today's fast changing technologies and given the way standards development organizations (SDOs) operate, it is not clear whether the ITU offers any unique value as far as standards development is concerned. The unique value the ITU offers is it is an intergovernmental organization. However in today's environment of multistakeholder approaches, an intergovernmental-based standards approach doesn't reflect the diverse nature of telecommunication and information industries. It should be noted that several countries include references to ITU output in their national regulations. For example the United Kingdom in their Communications Act (General Condition 2) requires that "Communication providers shall take full account of international standards or recommendations adopted by the ITU, CEPT, ISO and IEC".

(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?

ARIN's participation is limited to SG2 and SG3 and as a result our responses are limited to those two SGs and focused on providing information on the technical nature of our efforts so as to inform study group activities. Sector member participation is extremely limited in both SGs. At the most there is no more than ¼ of the participants who are non-government. More important than the number of participants is the issue of who participates and the value they receive from that participation, given the inability to affect the outcome due to its intergovernmental structure.

Furthermore the majority of participants, especially in SG3 are focused on meeting the needs of developing countries.

 (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?

Several telecommunication numbering related Recommendations have been implemented over the years, however they are relatively old, with periodic updates or edits, and have been in force for several years.

Newer recommendations don't seem to be as technically oriented in many cases, making implementation impossible or non-existent. Specificity is lacking in new recommendations as to implementation procedures, as well a lack of uniform agreement from participants. There has also been a push that new recommendations address specific national or regional issues which is out of the scope of the ITU.

Following are examples of some of the recommendations that have been implemented.

- E164 – International Public Telecommunications Numbering Plan,
- E212 – International identification plan for public networks and subscriptions, plan for public fixed and mobile networks providing users with access to public telecommunication services
- Q708 – Assignment Procedures for International Signaling Point Codes

(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?

ARIN's response to this question is contained by its responses to Question 1 and Question 6.

(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?

Overall the ITU-T seems to lack a consistent focus of purpose. Some study groups focus on developing country issues which may be better addressed in the ITU-D sector, while other study group focus on rather abstract forward looking issues.

There are instances of items of work which would seem to be duplicated between ITU-T SGs, resulting in a conflict between SGs and decisional conflict when it comes to recommendations. The same issues have occurred with regard to conflict between the ITU-T sector and ITU-D sector.

The rules and procedures and their implementation seem to vary depending on SG and sector. Consistently following the rules and procedures as laid out in various documents would help immensely and would help participants to understand better their roles and responsibilities. This would include for instance following guidelines for documents, and document input deadlines. Following up on decisions taken is also very important and not done on a consistent basis, for instance the issue of the SG20 gap analysis that was requested by TSAG which has not been done.

Additional training for ITU staff and SG counselors would be very beneficial for the participants. It is also important that the role of Counselors in meetings be clarified. There have been instances where counselors have behaved more as meeting participants, providing input to discussions and documents rather than advise on administrative issues.

(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?

It is the view of ARIN that public policy issues are first and foremost a national matter up to each Member State, and therefore is not something that necessarily should be standardized.

(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?

As the agency responsible for advising the President on telecommunication and information policy issues, NTIA may consider it's participation in study groups 2, 3 and possibly 20. SG2 is responsible for standards on the management of telecom services and SG3 focuses on the financial and economic aspects associated with the growth of ICT and mobile communications. Both groups could benefit from NTIA's expertise and input.   Study Group 20 is a relatively new study group with a focus on IoT and is still coalescing. While the activities appear to be with the mandate of NTIA, it is not totally clear to this reader and NTIA might want to participate initially to determine if they should continue to participate.

(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?

While the ITU is unique as an IGO, it is not the preeminent standardization organization with respect to the technical matters, particularly given the limited expertise that it has available and the number of standardization bodies that have evolved over the years, i.e.: IETF, IEEE, ETSI, ATIS, Broadband forum, and others. The ITU should do more to collaborate and cooperate with the other SDOs rather than insist on leading when the expertise resides outside of the ITU.

The ITU-D sector has the specific role to help bridge the digital divide and should lead those efforts, just as the R sector leads efforts when it comes to radio standards. The majority of attendees in SG2 or SG3 are from developing countries and the focus of the work seems to be more on developing country issues. This could be seen as an indication that the work should move to the D Sector rather than stay in the T Sector where the focus of the work is normally broader.

(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?

Many of the programs in SG3 would be better placed in the ITU-D sector with an emphasis on capacity building.   Given much of the work for traditional telecom

has been completed in developed countries, moving these efforts would enable the participants to focus efforts on developmental telecom work. This in turn would also allow for the work in the T sector to evolve towards more timely technical areas.