



**Computer & Communications  
Industry Association**  
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June 8, 2020

*Via Email WTS2020@ntia.gov*

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

**RE: Input on Proposals and Positions for the 2020 World Telecommunication Standardization Assembly**

Dear Ms. Meacham:

The Computer & Communications Industry Association (CCIA) submits this letter in response to the Federal Register Notice seeking input on proposals ahead of the 2020 World Telecommunication Standardization Assembly. CCIA generally agrees with the proposed positions and actions in the Federal Register Notice, and offers brief comments on questions sought below.

CCIA welcomes continued NTIA and U.S. leadership at the International Telecommunication Union (ITU), and strongly agrees with NTIA's view "that the success of the internet has been in part based on the fact that no one single entity controls it, allowing entrepreneurs, industries, scientists, and academics globally to continually innovate." A multistakeholder approach remains the best method to Internet governance, and it is important to maintain the "appropriate limited role" for the ITU.

There is a concerning trend with respect to the ITU pursuing standards work outside of its mandate, which duplicates work being done in more appropriate fora. Duplication can lead to fragmentation of the Internet and hinder further development of new technologies. The U.S. should discourage the ITU-T from venturing beyond the development of technical standards applicable to its core mission. In CCIA's view, the efforts of the ITU-T are best focused on technical efforts, rather than initiatives laying groundwork for recommendations on Internet regulation. CCIA is particularly concerned with the pursuit of work on AI and other emerging technologies, as these efforts would likely conflict with existing industry work within expert standards bodies. To this end, CCIA supports NTIA's proposed action to streamline the number of technical ITU-T Study Groups.

U.S. leadership across ITU work programs and other international fora remains critical to the future of the open Internet. Absent this strong leadership and engagement, unproductive agendas, including China's "New IP" proposal (proposing a remodel of core Internet protocols to facilitate greater state control of Internet services) may take hold. Accordingly, we appreciate NTIA's dedication to these important issues.

Sincerely,  
Matt Schruers  
President  
Computer & Communications Industry Association

25 Massachusetts Avenue NW, Suite 300C • Washington, DC 20001 • Ph: +1 (202) 783-0070  
First Floor • Rue de la Loi 227 • B-1040 Brussels • Belgium • Ph: +32 2 661 2020

[www.ccianet.org](http://www.ccianet.org)