



June 8, 2020

Via electronic submission

National Telecommunications and Information Administration
Office of International Affairs
1401 Constitution Ave, NW
Room 4701
Washington, DC
WTSA2020@ntia.gov

Re: Inputs on Proposals and Positions for 2020 World Telecommunication Standardization Assembly

Dear Sir or Madam:

Hughes Network Systems, LLC (“Hughes”) hereby submits these comments in response to the above referenced proceeding.¹ The 2020 World Telecommunications Standardization Assembly (“WTSA 2020”) is particularly important as it will set the agenda for the International Telecommunications Union (“ITU”) Telecommunications Sector (“ITU-T”) for the next four years. As discussed below, Hughes supports the National Telecommunications and Information Administration’s (“NTIA’s”) goals for this proceeding to “advocate for open, interoperable communications, with minimal barriers to the global exchange of information and services” and to preserve “United States influence in the technological ecosystem and the development of cyberspace as an open engine of economic growth, innovation and efficiency.”²

Hughes, a United States based satellite operator, is the largest U.S. satellite broadband provider with approximately 1.4 million customers across the Americas. Hughes operates three broadband satellites providing coverage to the continental United States, southeastern Alaska, Puerto Rico, and the U.S. Virgin Islands providing speeds of up to 25/3 Mbps to consumers. In addition, Hughes has under construction a new broadband satellite, which is expected to launch in 2021 and is capable of providing broadband speeds to U.S. consumers of approximately 100 Mbps in the continental United States. Hughes service is aimed at providing broadband service to users that are unserved or underserved by terrestrial broadband service.

Hughes agrees that the success of the internet has been based, at least in part, on the fact that no one entity controls it. This has allowed it to grow and benefit any user without any unnecessary limitations or a “one-size-fits-all” approach. However, we are concerned when the

¹ [Input on Proposals and Positions for the 2020 World Telecommunication Standardization Assembly, 85 FR 27390 \(May 8, 2020\) \(“WTSA Notice”\)](#).

² *Id.* at 27390



ITU-T sector is involved in areas that should be market driven and are being handled by other standard bodies with increased expertise. Accordingly, Hughes has concerns with the ITU-T sector becoming a duplicative body with regard to standard setting for a number of items that are being addressed elsewhere such as the Internet of Things. As NTIA prioritizes work for the ITU-T it is important that the ITU-T's work does not act to slow down innovation.

Further, Hughes has concerns, as the Notice correctly notes, that the ITU-T is moving out of its ambit of focus on standards development and veering into regulatory policy.³ Hughes urges NTIA to utilize the WTSA 2020 forum to refocus the ITU-T to areas more properly within its mandate. Hughes is especially concerned with the ITU-T operating outside its focus with how it pertains to the development of focus groups which, as the NTIA correctly points out, have increasingly focused on policy and regulatory matters.⁴ Not only is such work often policy in nature and outside of the remit of the ITU-T, it utilizes significant ITU, Member States, and sector members resources to ensure coverage of these meetings; resources that might be better expended elsewhere. By distracting these resources to cover meetings that aren't within the remit of the ITU-T, the overall quality and value of the ITU-T suffers.

Hughes also agrees with NTIA's statements on the importance of U.S. leadership in the ITU-T and agrees that NTIA should promote increased U.S. leadership within the ITU-T.⁵ However, as discussed above, this takes significant resources that are better used supporting areas within the remit of the ITU-T. Accordingly, as NTIA proposes, it is important, to work to streamline the ITU-T's organization and limit the use of the ITU-T process to address issues not in its remit so that coverage and work relating to the sector is as focused and relevant as possible. A more purpose-driven ITU-T would enable more targeted and effective participation by industry in ITU-T meetings. Areas like IoT, quantum communications and other emerging technology areas are outside the remit of the ITU-T and are not a sound use of scarce ITU-T, Member States or sector member resources.

In addition, for those in industry not well-versed in the ITU-T issues, it may be beneficial for NTIA to host periodic overviews of the items that are most important to the United States that are being addressed, so that industry could better assess the need for their participation. As a means of fostering industry participation and thus increasing U.S. leadership in the ITU-T, providing overviews of important issues can increase the likelihood that an industry stakeholder will participate in something that it would otherwise overlook or miss.

In terms of the ITU-T sector involvement in standards, it has become increasingly less important as standards development has moved to private sector standards bodies as a means of increasing the efficiency of the standard-making process ITU-T work on duplicative or overlapping standards may increase confusion in the communications marketplace and NTIA should support efforts that reduce duplicative work and fosters private sector standards

³ See *id* at 27391

⁴ See *id* at 27932

⁵ See *id* at 23792



development. In terms of the ITU-T sectors role for developing a secure supply chain, Hughes believes the development of best practices is an appropriate role for the ITU-T to play, as a trusted expert.

We welcome any questions or requests for additional information you may need.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Jennifer A. Manner", with a long horizontal flourish extending to the right.

Jennifer A. Manner