

**Before the  
DEPARTMENT OF COMMERCE  
National Telecommunications and Information Administration  
Washington, D.C. 20554**

In the Matter of	)	
	)	
Telecommunications/ICT Development	)	
Activities, Priorities and Policies to	)	
Connect the Unconnected Worldwide in	)	Docket No. 210503–0097
Light of the 2021 International	)	RIN 0660–XC050
Telecommunication Union (ITU) World	)	
Telecommunication Development	)	
Conference (WTDC–21)	)	
	)	

**COMMENTS OF THE INTERNET GOVERNANCE COALITION**

The Internet Governance Coalition writes in response to the National Telecommunications and Information Administration’s (“NTIA”) Request for Comment (“RFC”)<sup>1</sup> and welcomes this opportunity to provide support and recommendations regarding preparations for the International Telecommunication Union (“ITU”) 2021 World Telecommunication Development Conference (“WTDC” or “WTDC-21”).

**I. INTRODUCTION AND SUMMARY**

The Internet Governance Coalition (“Coalition”) is an industry group representing a very diverse set of major companies and organizations from across the Internet ecosystem. Members include Amazon, AT&T, Inc., Comcast NBCUniversal, Facebook, Google LLC, Microsoft Corporation, NCTA – The Internet & Television Association, The Walt Disney Company, and Verizon Communications. The Coalition advocates and supports policies that ensure a safe, secure, open, interoperable, and global Internet as the underlying foundation for sustainable

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<sup>1</sup> *Telecommunications/ICT Development Activities, Priorities and Policies to Connect the Unconnected Worldwide in Light of the 2021 International Telecommunication Union (ITU) World Telecommunication Development Conference (WTDC–21)*, Request for Comment, Docket No. 210503–0097, RIN 0660–XC050, 86 Fed. Reg. 24391 (May 6, 2021) (“RFC”).

economic and social development. The Coalition members provide a wide range of information and communications technology (“ICT”) services around the world, including in developing countries, and frequently engage with the ITU and other international organizations. The Coalition itself has long participated in discussions surrounding international ICT public policy issues by providing expertise and a wide range of industry perspectives on issues pertinent to Internet governance.

The ITU Development Sector (“ITU-D”) is engaged in extraordinarily important international information communication technologies issues as it seeks to support broadband connectivity for billions more people in the developing world. The Coalition commends NTIA for working with others in the U.S. Government to identify ways to be as effective as possible in helping to achieve this objective of expanded global connectivity, and supports NTIA’s efforts within the interagency process to advance these principles in bilateral and multilateral engagements with other nations regarding Internet and digital communications policy issues. Those particular issues may include the free flow of information, promoting private sector investment and innovation, sound principles of privacy and security, and fostering an environment for the development and deployment of new technologies.

Below, the Coalition addresses four major areas among those covered by the RFC: expansion of broadband connectivity; increase in Internet adoption; capacity development; and international engagement. At the outset, the Coalition notes that Ms. Doreen Bogdan-Martin, current Director of ITU-D, is playing an outstanding role in focusing ITU-D’s work on priority issues for WTDC preparations in the “Road to Addis” sessions on topics such as stakeholder partnerships, digital inclusion, innovative financing, and youth engagement. Coalition members

are active in these discussions, USG and CITELE preparations for WTDC, and the ongoing activities of ITU-D.

## **II. EXPANDED GLOBAL BROADBAND CONNECTIVITY IS OF PARAMOUNT IMPORTANCE**

One of the stated objectives of WTDC-21 is to mobilize people and resources to “Connect the Unconnected to Achieve Sustainable Development,”<sup>2</sup> and the Coalition strongly supports this objective. The need to connect almost half the world’s population who are not online is undisputed, and closing that gap by 2030 is a paramount goal at the United Nations and beyond.<sup>3</sup> The United States must be a vocal advocate of the power of connectivity to promote sustainable development and economic opportunity around the world. Continued innovation and expansion in global connectivity requires policies that promote private sector investment, and foster the long-term growth of the Internet economy, rather than chilling investment and innovation through excessive regulation, resulting in restrictive access to information and services.

In part, this is a matter of deploying additional infrastructure and services for unserved and underserved communities. For example, 49% of the world’s population is made up of non-Internet users, about 3.341 billion individuals, with higher-than-average rates of non-usage in Africa (71%, or 425 million people), Asia and the Pacific (55%, or 2.227 billion people) and the Arab States (45%, or 121 million people).<sup>4</sup> ITU-D has found that “[t]he digital divide can be explained in part by the lack of network infrastructure.”<sup>5</sup> Further broadband deployment in the developing world necessitates massive private sector investments, which require enabling regulatory environments

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<sup>2</sup> *Id.* at 24393.

<sup>3</sup> *Id.* at 24392.

<sup>4</sup> See *Telecommunication industry in the post-COVID-19 world, Report of the 7<sup>th</sup> ITU Economic Experts Roundtable*, International Telecommunication Union, Development Sector, 3 (2021).

<sup>5</sup> *Id.*

that simplify licensing and buildout procedures and otherwise remove barriers for broadband providers of many types to participate easily in deployment and provision of services.

Various models for funding of broadband should continue to be explored within ITU-D. While private sector funding remains paramount, the Coalition notes the important roles of funding through public-private partnerships, international development banks, and potentially new models for hybrid sources of funding. In addition, many universal service funds, including in developing countries, are not being fully utilized and could be significant sources of funding for broadband.<sup>6</sup>

Sharing of best practices in public policy and learned experience is vital, while at the same time contexts and markets vary, and public policy should be tailored to reflect those differences. For example, many developing countries currently rely more heavily on mobile networks than on fixed networks for Internet connectivity.<sup>7</sup> As a result, policy approaches designed to increase the deployment of connectivity infrastructure must allow for flexibility in execution based on the needs of each region, country, or community. For these reasons, it is important that the U.S. Government continue its commitment to being technology neutral.

### **III. PUBLIC POLICIES MUST BE DESIGNED TO INCREASE UPTAKE**

ICT network deployments only address one facet of the “connectivity gap,” because, among other reasons, a network is only useful to the extent it is adopted. Adoption of deployed networks is equally important as network deployment, and connecting the next billions of people

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<sup>6</sup> See, e.g., Rohan Samarajiva and Gayani Hurulle, *Metrics to improve universal-service fund disbursements*, 21 Digital Policy, Regulation, and Governance 102, 105 (2019) (describing studies showing a significant gap between funds gathered in USF programs and funds actually dispersed).

<sup>7</sup> See *Measuring Digital Development, Facts and Figures, 2020*, International Telecommunication Union, Development Sector, 9 (2020), <https://www.itu.int/en/ITU-D/Statistics/Documents/facts/FactsFigures2020.pdf> (“2020 Facts and Figures”). For example, in Africa, there are 33 active-mobile broadband subscriptions for every 100 inhabitants, as compared to 1 fixed-broadband subscription; those numbers are 60 and 8 per 100 in the Arab States and 77 and 15 per 100 in the Asia & Pacific region. *Id.*

by definition requires major advances in digital inclusion. For example, major gender gaps remain in broadband adoption,<sup>8</sup> and the Coalition strongly supports NTIA's stated goal of "promot[ing] inclusion, with a focus on women and girls and students, as drivers for adoption, especially in developing countries."<sup>9</sup>

A number of government policies can support achieving this goal and others related to adoption, and ITU-D can assist countries in further exploring these ideas. For example, countries should identify the barriers to adoption among their own populations in as much detail as possible with close analysis of the needs of various users based on factors such as language, age, gender, education, and relevant uses of digital services. Based on these findings, countries can effectively target government-supported training in digital literacy and other skills, as well as encourage the availability of relevant content (e.g., education, healthcare, government services, agriculture and fishing, and other economic data). A lack of computers, mobile Internet devices, and other equipment is one common barrier to the adoption and use of Internet services, and thus governments may also wish to consider ways to assist in funding equipment. Finally, connecting individuals with the institutions in their communities is essential, in part because gaining access to these institutions may motivate more people to adopt available connectivity. Such institutions include schools, healthcare facilities, and locally based Internet access centers.

Additionally, the Coalition notes that advances in adoption will only occur if Internet connectivity and services are seen as trusted, secure, private, equitable, and protective of human rights. Threats to Internet security can weaken consumer confidence, and hinder economic growth and innovation. Policies and programs should therefore be structured with the goal of putting

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<sup>8</sup> *See id.* at 8 (showing gender gaps in Internet usage of 12% for landlocked developing countries, 13% for the least developed countries, and 9% for developing countries).

<sup>9</sup> *RFC*, at 24392.

people first. Leadership on these issues rests primarily with the private sector and with specialized intergovernmental organizations and private sector-led entities. For example, the OECD has developed policy principles regarding privacy, security, and trustworthy AI. Various UN organizations continue work on cybersecurity and human rights in the digital context. The Coalition supports continuation of an approach by the U.S. Government that engages in the above deliberations, often on a multistakeholder basis, but notes that ITU expansion into these areas would not be appropriate or productive.

#### **IV. INCREASING CONNECTIVITY REQUIRES EFFECTIVE INITIATIVES TO BUILD EXPERTISE AND SKILLS**

NTIA rightly focuses on capacity development in the RFC. The RFC notes that BDT Director Doreen Bogdan-Martin seeks to achieve more concrete results and outcomes in project and capacity building implementation; asks how virtual platforms might enhance the capacity building work of the BDT and ITU-D study groups; and inquires about entities' participation in capacity-development activities, particularly those focused on meeting developing country needs.<sup>10</sup>

Capacity building initiatives are central to accomplishing the purpose of the ITU's development programs and to the overall achievement of sustainable global Internet connectivity and use. One of the hallmark strengths of ITU-D is its engagement in capacity development to help ITU members build expertise and skills. The Coalition recommends that U.S.-based programs in this area be expanded and provided necessary funds to reach a wider audience. Regulators and other government officials from developing countries typically are very interested in exchanges with their counterparts and other experts from both government and the private sector.

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<sup>10</sup> See *RFC*, at 24392.

Historically, the U.S. has facilitated such programs in many ways. The U.S. Telecommunications Training Institute (“USTTI”) is an outstanding model for training, with its Board composed of the Chair of the Federal Communications Commission (“FCC”), the Administrator of NTIA, and the U.S. Coordinator for International Communications and Information Policy at the Department of State, as well as senior representatives of a wide range of private sector entities.<sup>11</sup> USTTI courses cover a wide range of current topics and are generally taught by experts including those from the government and private sector entities on the Board. The scholars are from developing countries, with a high proportion from Africa.

Similar training opportunities have been embodied in visitors’ programs at the FCC and the Department of State and in special training sessions tailored to priority topics for specific developing countries. USAID has generated numerous such programs and the Coalition supports materially enhancing and expanding such programs. On the private sector side, ICT entities frequently participate as experts in ITU sessions, training institutes, conferences organized in developing countries, and venues such as the Internet Governance Forum. In addition, capacity building programs may be organized as needed in developing countries with the assistance of Department of State and Department of Commerce staff responsible for digital affairs at U.S. embassies. While in-person sessions are preferable, especially for relationship building, it has become apparent that virtual opportunities are also effective. The Coalition recommends expansion of these types of initiatives, taking into consideration the insights into relevant topics that are expressed in preparations for WTDC.

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<sup>11</sup> See *Directors*, USTTI (last accessed May 17, 2021), <https://ustti.org/directors/>.

## **V. INTERNATIONAL ENGAGEMENT SHOULD BE A PRIORITY AND REFLECT A WHOLE-OF-GOVERNMENT AND MULTISTAKEHOLDER APPROACH**

The Coalition encourages the United States to continue to prioritize international engagement on these issues, mobilizing a whole-of-government and multistakeholder approach. The Coalition notes that NTIA “seek[s] to reach the U.S. telecommunication/ICT stakeholder community and expand this community with new connectivity stakeholders in order to obtain a diverse range of views and increase recognition about the positive contributions U.S. entities are making to connect the unconnected and increase digital inclusion.”<sup>12</sup> The Coalition shares this view and encourages NTIA to continue to champion the multistakeholder model of international Internet governance. Internet governance and policies are best developed through a bottom-up, transparent, and consensus-driven process. Open forums bring viewpoint diversity, and input from government, industry, academia, the technical community, and civil society is necessary for Internet stability and reliability. And transparency provides for informed stakeholder engagement. Overall, prioritizing addressing these issues from as many different perspectives as possible will be the most effective way to move forward and to promote sustainable economic and social development. The Coalition looks forward to continuing consultations and, where appropriate, collaboration with NTIA and others in the interagency process to ensure efficiency and effectiveness at ITU-D.

## **VI. CONCLUSION**

Continued growth and adoption of the Internet and digital communications are vitally important for sustainable development and public welfare. To achieve the full potential of the Internet, and the digital economy, the Coalition encourages NTIA to continue advocating for a safe, secure, open, interoperable, and global Internet. NTIA can continue to have considerable

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<sup>12</sup> *RFC*, at 24392.

impact on international policy by advancing pro-investment and pro-innovation policies, and by urging the international community to pursue solutions through transparent, inclusive and collaborative processes. The WTDC offers NTIA another opportunity to advance these policies at the ITU, and before the international community.

The Coalition looks forward to working with NTIA, and others in the interagency process, to further develop and implement its positions and its priorities at the WTDC.

Respectfully submitted,

**INTERNET GOVERNANCE COALITION**

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