Before the
NATIONAL TELECOMMUNICATIONS AND INFORMATION ADMINISTRATION
Washington, DC 20004

In the Matter of	)	
	)	Docket No. 160509408-6408-01
Input on Proposals and Positions for 2016	)	
World Telecommunications	)	RIN 0660-XC02
Standardization Assembly	)	
	)	
	)	

COMMENTS OF THE TELECOMMUNICATIONS INDUSTRY ASSOCIATION

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The Telecommunications Industry Association (TIA) appreciates the opportunity to submit these comments on behalf of its member companies regarding positions to be supported by the NTIA and U.S. Department of State at the 2016 World Telecommunication Standardization Assembly of the International Telecommunications Union (ITU). TIA, a Standards Development Organization (SDO), has been continuously accredited by the American National Standards Institute (ANSI) since 1994. TIA and its member companies have a unique interest in these proceedings due to its significant role in the development of information and communications technology (ICT) technical and operational standards.

I.   INTRODUCTION

TIA standards are essential to the ICT ecosystem and indispensable to the voice of North America in the international arena. As a trade association representing hundreds of ICT manufacturers, vendors, and supplier company members, TIA members participate with other industry experts in open, transparent processes to develop and maintain voluntary consensus ICT industry standards, specifications, and guidance materials. TIA manages dozens of engineering committees comprised of hundreds of volunteers who regularly collaborate with domestic and international SDOs. The committees include representatives from manufacturers of communications equipment, service providers and end-users, as well as local, state and federal government entities. These diverse stakeholders have produced more than 3,000 standards used by companies, consultants, and governments to produce interoperable products In the United States and around the world. Current areas of focus include public safety communications; data center cabling; emergency communications infrastructure in areas such as fiber optics, public and private interworking: telecommunications cable infrastructure; cell tower design; wireless and mobile communications; multimedia and voice over internet protocol ("VoIP") access; and vehicular telematics.

II.   TIA RECOMMENDATIONS

TIA and other regional and global SDOs work together to ensure the diverse needs of the international ICT community and countries around the world are addressed. TIA and the Alliance for Telecommunications Industry Solutions (ATIS) are key partners in promoting the interests of North American stakeholders. The ITU Telecommunication Standardization Sector (ITU-T) has a significant, vital role as an intergovernmental organization and global convenor. Likewise, the International Organization for Standardization (ISO) and International Electrotechnical Commission (IEC) have significant, complementary goals and memberships. Consistent, open communication among these groups is key to harmonization and effectiveness.

TIA appreciates the invaluable, often integrated role of the different entities and the opportunity to liaison with these experts. Through its membership on U.S. National

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Committee, IEC, TIA helps guide IEC's harmonization of telecommunications standards on behalf of the United States in collaboration with other international entities. As administrator for a key working group of the ISO/IEC Joint Technical Committee (JTC) 1, Information Technologies, TIA works alongside other organizations and companies to represent U.S. interests on the global stage and facilitate harmonization. JTC 1 has published nearly 3,000 ISO standards in key ICT technologies.

To ensure the essential work of ITU-T, as well as the essential work of regional and other international SDOs, complement each other, TIA recommends:

Continued Unique ITU Role. As the United Nations specialized agency focused on communications technology, ITU has more than 190 member nations, including developing nations aspiring to meet the needs of growing economies. These government representatives work closely with a diverse cross-section of the private sector to allocate global radio spectrum and satellite orbits, and develop consensus technical standards to improve connectivity across the globe. As such, ITU is poised to continue its global efforts in communications operations and interconnectivity. TIA urges renewed ITU focus on areas of consensus in communications technology, rather than initiatives such as the Product Conformity Database that are removed from ITU's traditional focus. For example, its diverse membership could undertake a comprehensive global needs assessment, including perspectives of underserved communities and growing economies. This would further ITU's goal of seamless, global connectivity and guide future initiatives.

Greater Efficiency/Avoidance of Duplication. Regional SDOs like TIA have long engaged in collaborative efforts with other regional SDOs to address specific areas of concern. oneM2M is a perfect example: formed in 2012, eight leading regional ICT SDOs work with over 200 companies and government entities to develop and promote M2M architecture and standards for machine to machine communications. TIA, through Cisco, currently serves as chair of oneM2M. oneM2M has released IoT standards and specifications representing years of collaboration, research and consensus. This critical interaction among regional SDOs ensures that unique regional factors, regulatory and legislative schemes, and priorities are taken into account. Eventually ITU may play a role by shaping these initiatives into global initiatives, but this should not replace the essential role of SDOs. The Third Generation Partnership Project (3GPP2) is another example of focused, successful collaboration among SDOs. Arising out of ITU's IMT-2000 initiative, 3GPP2 brings together five officially-recognized SDOs from Japan, China, North America, and Korea with knowledgeable technical partners to develop 3G telecommunications specifications. ITU should strive to avoid duplication of these sorts of efforts, making efficient use of its unique resources and strengths.

Transparent Communication and Collaboration. Like other standards organizations, ITU should consistently engage in communication and collaboration with its members, other organizations, and public-private partnerships in the communications environment to ensure smart, necessary initiatives are undertaken. Many ongoing efforts share common objectives

and missions, resulting in constant pressure on the time and resources of volunteer industry and government experts who often participate in multiple groups. Just as other international and regional bodies around the world have done, ITU should engage in partnerships and international standardization communities such as its recent joining of the Global Standards Collaboration group.

III. CLOSING

TIA appreciates the leadership of NTIA and the State Department at the upcoming WTSA-2016 and other forum, and the opportunity to submit these recommendations on behalf its members. Please contact us if we can be of further assistance.

Respectfully submitted,

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