28 September 2012

**Mr. Petko Kantchev**
Chair of the Informal Group of Experts
World Telecommunication Policy Forum 2013

**cc. Hamadoun Touré**
Secretary-General
International Telecommunication Union

**International Telecommunication Union**
Place des Nations
CH-1211 Geneva 20
Switzerland

**Re: Comments on the third draft report of the ITU Secretary General on the 2013 World Telecommunication Policy Forum (WTPF)**

Dear Mr. Petko Kantchev,

The Internet Society (ISOC), the Internet Corporation for Assigned Names and Numbers (ICANN) and the Number Resource Organization (the NRO, comprising the five Regional Internet Registries) would like to thank you for recognizing our participation at the Informal Experts Group (IEG).

The purpose of this letter is to provide comments to the Third Draft of the Secretary General's report for the Fifth World Telecommunication Policy Forum (WTPF). Our organizations value this opportunity to provide our views and we offer this submission in the spirit of multi-stakeholder dialogue.

The comments offered below are preliminary and we may come back to you, collectively or individually, with further views on the draft report:

1. **Comments on the Preamble**

   Paragraph 1.1.5 of the Third Draft of the Secretary-General's Report[1], calls for "*the need to avoid contradiction between the debates at WTPF and on-going activities undertaken as part of ITU's mandate*". Some of these debates and activities are cited in paragraphs 1.1.2, 1.1.3 and 1.1.4. We note that these debates and activities are not publicly accessible, some of them not even to ITU Sector Members.

   While we acknowledge and appreciate the openness in which the discussions of the WTPF-2013 have been held so far, we would hope that WTPF discussions not be pre-constrained to specific outcomes as expressed in paragraph 1.1.5. Furthermore, those contradictions that paragraph 1.1.5 calls to avoid may need to fully disclosed in order for the openness of the WTPF process to be maintained.

2. **Comments on the Themes for WTPF-2013**

   There has been an extensive debate about the main themes for WTPF-2013 at the Informal Experts Group. Some contributions (i.e. USA, UK and ISOC) have made specific theme proposals for the Forum and this was also discussed at the first meeting of the IEG. In our last joint letter[2], sent to you on June 25th, we also expressed our support for a forward-looking theme for the whole WTPF and we proposed "Strategies for developing Internet connectivity at the global level" as an option. We note that paragraph 2.2 of the Third Draft of the Secretary-General's Report takes into consideration some of the suggested themes. However, the report does not commit to expand on any of those themes as the main focus of WTPF, and neither does the structure of the document reflect the list which is provided. Paragraph 2.3 effectively downplays the debate on the main themes and returns

[1] Publicly available at: http://www.itu.int/md/S12-WTPF13PREP-R-0004/en

[2] Publicly available at: http://www.itu.int/md/dologin_md.asp?lang=en&id=S12-WTPF13PREP-C-0015!!PDF-E

to a structure that reflects past debates that were already considered in WTPF-2009, at PP-10 and in other venues. Moreover, we found no particular proposal at the IEG that supported discussion of topics under sections 2.3.3 or 2.3.4 of the Draft Report.

We respectfully ask you to support the general sense of the Group to re-structure the debate, and the report itself, around the suggested themes. The next meeting of the IEG in October will be an opportunity to discuss these themes, and, in this context, the Opinions which will be an expected outcome of WTPF. These themes will allow a forward-looking and constructive WTPF process, which will not reopen past debates on the already established Resolutions 101, 102 and 133; but take them a step further into more constructive areas.

3. **Bridging views of "some" and "others"**
   In the Third Draft of the Secretary-General's Report there are numerous instances in which the views of "some" are contrasted with those of "others". For example, there are contrasting views on whether the ITU and/or the current management of the Internet are "sufficiently multistakeholder". It is suggested that some think the Internet architecture can withstand current and future demands for security, quality of service, identity management or multilingualism; while others are described as thinking that the underlying technical architecture must change. There are different views expressed about IPv6 deployment and ways to promote its adoption, the role of policy-makers and whether reform is needed of the existing structures and processes. The draft also references concerns about RPKI, the magnitude and scale of the gTLD expansion, the delegation and administration of ccTLDs, the process towards multilingualism in the DNS and the composition of the GAC of ICANN.

   Future drafts of the Secretary-General's report could consider simple factual accounts of what is taking

place on these subjects without any conjecture on whether these are beneficial or not. We think that plurality of competing views is important for deliberations, as much as all relevant parties can participate in the debate on an equal footing. This plurality needs to be reflected in the draft report.

Finally, we strongly suggest finding an agreement on a main theme first, and then structuring the next Draft Report and deliberations around this subject.

Thank you for allowing us to have a say in this process. We trust you will be successful in conveying the IEG's views as constructive inputs for the next versions of the Secretary-General's Report. We look forward to participate in a productive meeting in October.

Sincerely,

**Constance Bommelaer**
Director, Public Policy The Internet Society

**Cathy Handley**
Executive Director Government Affairs and Public Policy ARIN

**Nigel Hickson**
Vice President, Europe Global Partnerships ICANN

**Paul Wilson**
Director General APNIC