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| **STUDY GROUP 3** | |
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| **CONTRIBUTION** | | | | | |
| **Source:** | | United States of America | | | |
| **Title:** | | Response to TD10/WP3 – new draft ITU-T Recommendation D.DigID: Policy Framework including Principles for Digital Identity Infrastructure | | | |
| **Purpose:** | | Proposal | | | |
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| **Keywords:** | | Q11/3; Digital identity infrastructure; Draft Recommendation; domestic | | | |
| **Abstract:** | | The remit of the ITU-T is to address international issues. The new draft ITU-T Recommendation D.DigID, however, is a description of a national Authentication solution. A Recommendation based on a single country national approach is inappropriate and inconsistent with the role of the ITU. For the same reason, it is not the type of use case sought by Study Group 17. The current text, therefore, is neither appropriate, stable, nor mature. | | | |

**Discussion.** The text of [TD10/WP3](https://www.itu.int/dms_inf/itu-t/md/17/sg03/td/180409/WP3/T17-SG03-180409-TD-WP3-0010!!MSW-E.docx) is based on combining several items from the April 2017 SG3 meeting: [TD2 (WP3/3)](https://www.itu.int/md/T17-SG03-170405-TD-WP3-0002/en), [C238](https://www.itu.int/md/T13-SG03-C-0238/en) (from the 2013-2016 study period), the Liaison Statement (LS) to SG17 contained in [TD376](https://www.itu.int/md/T13-SG03-160222-TD-PLEN-0376/en) (2013-2016), and the LS received in reply from SG17 in [TD3-GEN](https://www.itu.int/md/T17-SG03-170405-TD-GEN-0003/en). Last year, however, several Member States viewed the draft with concern given it described a national, not international, system, and so was inappropriate both for SG3 and as a “use case” for SG17.

The United States is concerned that the current text could cause similar confusion, for three reasons: (1) the text continues to describe a national system, which is beyond the scope of this Study Group’s mission; (2) national identification systems are not helpful Digital ID “use cases” for SG17; and (3) different Member States have different methods for protecting personal data.

*First and most importantly*, the Introduction to TD10/WP3 clarifies it addresses a “nationally portable” system of identification verification that could be used to distribute government subsidies or collect taxes. The word “international” never appears in the draft. Yet, according to Article 14 of the Convention, provision 193, TSB Study Groups should be “standardizing telecommunications on a *worldwide* basis” (emphasis added). Moreover, the United States does not believe computer processing for Authentication qualifies as “telecommunication.”[[1]](#footnote-1) Finally, the word “interoperable” never appears in the text. This is for good reason: authentication systems are designed *not* to be interoperable, typically for national security reasons. Therefore, however, as a stand-alone national system, this draft would not fulfil the Union’s fundamental purpose: to pursue and promote “an interconnected world,” pursuant to PP-14 Resolution 71, Annex 2, Section 2.1.

Accordingly, as we read it, TD10/WP3 and the domestic authentication system described therein is neither telecommunication nor interconnected nor worldwide. It thus appears the current draft exceeds the scope of SG3’s, and the Union’s, mandate.

*Second*, we are unsure whether this text meets the Working Party’s directives. The [2017 Report of Working Party 3/3 (Section 3.3.1)](https://www.itu.int/dms_ties/itu-t/md/17/sg03/r/T17-SG03-R-0004!!MSW-E.docx) asked the Rapporteur to consider the LS from SG17, and [craft recommended “use cases” for SG17](https://www.itu.int/md/T17-SG03-170405-TD-GEN-0003/en); [the latter would formulate the necessary standards](https://www.itu.int/md/T17-SG03-170405-TD-GEN-0003/en). Although SG17 is the lead study group on identity management, including telebiometrics, it seeks *international* use cases; we are not aware of SG17 examining purely domestic systems.

*Third,* different Member States have different ways of protecting Authentication information, including personally identifiable information (PII), within their own borders. So, no Authentication system can ever be universal. Indeed, domestic laws can change over time, potentially forcing expensive backwards-compatible changes in any biometric system. This makes an SG3 Recommendation especially problematic.

In sum, TD10/WP3 is a description of a domestic use case. It may be an excellent system, but a domestic use case should not automatically become a draft Recommendation. Thus, the text is not appropriate, stable, or mature.

The United States requests that this contribution be made available publicly without restriction.

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1. The word is used only once in TD10/WP3, in the Summary. [↑](#footnote-ref-1)