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| Title: ITU logo | INTERNATIONAL TELECOMMUNICATION UNION  **TELECOMMUNICATION STANDARDIZATION SECTOR**  STUDY PERIOD 2022-2024 | | | TSAG-TD392 |
| TSAG |
| **Original: English** |
| **Question(s):** | | N/A | | Geneva, 22-26 January 2024 |
| **TD (Ref.:** [SG2-LS99](http://handle.itu.int/11.1002/ls/sp17-sg2-oLS-00099.docx)**)** | | | | |
| **Source:** | | ITU-T Study Group 2 | | |
| **Title:** | | LS/r on Guidelines on the appointment and operations of registration authorities (reply to TSAG-LS23) [from ITU-T SG2] | | |
| **LIAISON STATEMENT** | | | | |
| **For action to:** | | | - | |
| **For information to:** | | | ITU-T SG11, SG16, SG17, TSAG | |
| **Approval:** | | | ITU-T Study Group 2 management team (by correspondence, 1 December 2023) | |
| **Deadline:** | | | - | |
| **Contact:** | | | Philip Rushton SG2 Chair United Kingdom | Tel: +44 20 3286 3085 E-mail: [philrushton@rcc-uk.uk](mailto:philrushton@rcc-uk.uk) |

This liaison statement answers [TSAG-LS23](https://www.itu.int/ifa/t/2022/ls/tsag/sp17-tsag-oLS-00023.docx).

A new liaison statement has been received from SG2.

This liaison statement follows and the original file can be downloaded from the ITU ftp server at <http://handle.itu.int/11.1002/ls/sp17-sg2-oLS-00099.docx>.

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|  | INTERNATIONAL TELECOMMUNICATION UNION  **TELECOMMUNICATION STANDARDIZATION SECTOR**  STUDY PERIOD 2022-2024 | | | | **SG2-LS99** | |
| **STUDY GROUP 2** | |
| **Original: English** | |
| **Question(s):** | | | All/2 | | Geneva, 8-17 November 2023 | |
| **Ref.: SG2-TD320/GEN** | | | | | | |
| **Source:** | | | ITU-T Study Group 2 | | | |
| **Title:** | | | LS/r on Guidelines on the appointment and operations of registration authorities (reply to TSAG-LS23) | | | |
| **LIAISON STATEMENT** | | | | | | | |
| **For action to:** | | | | - | | | |
| **For information to:** | | | | TSAG, ITU-T SG11, SG16, SG17 | | | |
| **Approval:** | | | | ITU-T Study Group 2 management team (by correspondence, 1 December 2023) | | | |
| **Deadline:** | | | | - | | | |
| **Contact:** | | Philip Rushton SG2 Chair United Kingdom | | | | Tel: +44 20 3286 3085 E-mail: [philrushton@rcc-uk.uk](mailto:philrushton@rcc-uk.uk) | |

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| **Abstract:** | This Liaison Statement responds to [TSAG-LS23](https://www.itu.int/ifa/t/2022/ls/tsag/sp17-tsag-oLS-00023.docx) on Guidelines on the appointment and operations of registration authorities. |

Although the concept of registration authorities as discussed in the “Guidelines on the appointment and operations of registration authorities” does not apply to the TSB, there are operational implications that are within the remit of ITU-T SG2 and for which normative text is required.

The guidelines describe two ITU-T Recommendations required for a registration authority – a technical Recommendation and a procedural Recommendation. It is the latter that falls under the remit of ITU-T SG2. Many of the details of the “Guidelines on the appointment and operations of registration authorities” overlap.

Some of the specific details that indicate where further operational considerations are required are as follows:

1. The approval process for the procedural Recommendation should, in line with WTSA Resolution 40, be TAP. Specifically, because it contains elements that are related to identification.
2. In clause 6.4 the reference to “criteria for applicants for registration” is followed by a possible list. This is insufficient as such criteria need to be defined in normative text together with a specified list (as opposed to an exemplar list) that is applied consistently and transparently.
3. The process to assess any application should not be made to a study group, but to the Director of TSB, and an authoritative group should review such an application and advise the Director of TSB. It should not be a study group that makes that decision. To do otherwise is to raise potential issues of personal liability.
4. In the detail some other issues that should be treated in a consistent and transparent manner are:
   1. The applicant will have a focal point and the application should come from that entity (clause 6.7).
   2. The fees to be charged are outside the remit of the ITU (clause 6.5 and clause 8).
   3. The need for continued membership of the organization referred to in clause 6.4 should be covered in clause 6.8.
   4. The complete list of information for the register should be given, not just the minimum (clause 6.9).
   5. The criteria for rejection should be the failure of the applicant to meet the criteria specified in clause 6.4 (see clause 6.10).
   6. The need for clause 6.11 is not well explained.
5. Clause 7 limits the use of the “Guidelines on the appointment and operations of registration authorities” to a study group meeting. The process should not be so limited, and in not being so limited the time for submission is not the issue but rather the time to take a decision.
6. Clause 7.3 should not be required if the entity is a member of the organisations identified in clause 6.4. The fact that there is reference to the ITU legal advisor would indicate a role for the ITU for which a cost is incurred and which should be recovered by the Union.
7. Clause 9 does not indicate what steps would be taken if there was no annual report.

It is the view of SG2 that whilst the “Guidelines on the appointment and operations of registration authorities” are a useful baseline text, there are operational issues for which ITU-T SG2 should develop the above-mentioned procedural Recommendation.

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