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| Title: ITU logo | INTERNATIONAL TELECOMMUNICATION UNION**TELECOMMUNICATION STANDARDIZATION SECTOR**STUDY PERIOD 2022-2024 | TSAG-TD565 |
| TSAG |
| **Original: English** |
| **Question(s):** | N/A | Geneva, 29 July - 2 August 2024 |
| **TD(Ref.:** [SG2-LS102](http://handle.itu.int/11.1002/ls/sp17-sg2-oLS-00102.docx)**)** |
| **Source:** | ITU-T Study Group 2 |
| **Title:** | LS/r on Further review of draft Recommendation ITU-T A.RA "Appointment and operations of registration authorities" (reply to TSAG-LS37) [from ITU-T SG2] |
| **LIAISON STATEMENT** |
| **For action to:** | TSAG |
| **For information to:** | - |
| **Approval:** | ITU-T Study Group 2 management (19 April 2024, by correspondence) |
| **Deadline:** | - |
| **Contact:** | Phil RushtonUK | Tel:+44 1206 729738E-mail: philrushton@rcc-uk.uk  |

This liaison statement answers [TSAG-LS37](https://www.itu.int/ifa/t/2022/ls/tsag/sp17-tsag-oLS-00037.zip).

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-00102.docx>.

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|  | INTERNATIONAL TELECOMMUNICATION UNION**TELECOMMUNICATIONSTANDARDIZATION SECTOR**STUDY PERIOD 2022-2024 | **SG2-LS102** |
| STUDY GROUP 2 |
| Original: English |
| **Question(s):** | 1/2 | Geneva, 19-28 June 2024 |
| **(Ref.:** [**SG2-TD440/GEN**](https://www.itu.int/md/T22-SG02-240619-TD-GEN-0440/en)**)** |
| **Source:** | ITU-T Study Group 2 |
| **Title:** | LS/r on Further review of draft Recommendation ITU-T A.RA "Appointment and operations of registration authorities" (reply to TSAG-LS37) |
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| **Abstract:** | This liaison statement replies to TSAG’s request to consider further the amended text of draft Recommendation ITU-T A.RA. The liaison raises a number of issues that require clarification. |

ITU-T SG2 thanks TSAG RG-WM for the opportunity to comment on the amended text of draft recommendation ITU-T A.RA ([TSAG-LS37](https://www.itu.int/ifa/t/2022/ls/tsag/sp17-tsag-oLS-00037.zip)). In addition to reviewing the current proposed text of draft recommendation ITU-T A.RA, this liaison also responds to the comments that have been provided to the earlier comments of ITU-T SG2.

A number of points require clarification, including (but not limited to) the resources to which this Recommendation would apply. There is reference to the X.660 series of Recommendations in the bibliography, these are not reflected in clause 2. Furthermore the first bullet in clause 7.1 that refers to “a description of the identification scheme” should refer to Recommendation ITU-T X.660 as well as other relevant Recommendations of the X series to ensure transparency and clarity of the scope of Recommendation ITU-T X.660.

The scope indicates that the Recommendation does not apply when the TSB is the registration authority, yet in clause 6.1 the TSB is implicitly involved through its role in negotiations. As a consequence, any resource, or management of a resource, that is specified in ITU-T Recommendations, is the responsibility of the Director of the TSB (see OD16 below). This approach changes the decision to select a candidate from the study group to the Director of the TSB, and requires the study group to advise the Director accordingly. There are also consequences in other parts of the document, e.g. clause 6.4.

Clause 6.2 refers to “every type of registration” that is not reflected in the rest of the text. The rest of the text would suggest that it is “instances of registration” that rather than “type of registration”.

Clause 7.5 refers to a “register” and clause 7.6 refers to the contents of the register. However, there is no reference to data protection, nor to the ability of the TSB to audit such registers for compliance with either the Recommendation that generated the identifier or the management as specified in draft Recommendation A.RA.

Annex A presents a useful starting point for the development of the criteria. One consideration is to develop the criteria to reflect in more detail the text of the proposed draft Recommendation.

The responses from the Rapporteur to SG2’s previous comments are assessed below:

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| **Comment** | **SG2 Updated response** |
| OD2 | RA candidates should be ITU members as they are utilising ITU resources, in both the application and specification of the Recommendations. |
| OD6 | Membership of the union is required to ensure compliance with ITU-T Recommendations. |
| OD7 | The criteria need to be a defined list rather than examples in a unfinished list. |
| OD9 | The determination of fees by ITU Council needs to be reflected into the text as to what the fees are. The role of the ITU/TSB needs to be further clarified. |
| OD10 | ITU-T SG2 did not distinguish the roles but made the point that, irrespective of whether the registry authority or the “applicant”, a focal point is required. |
| OD11 | On-going. |
| OD12  | On-going. |
| OD14 | No comment as yet. |
| OD15 | SG2 does not confuse the terms but rather makes the point that entities, either as RAs or applicants, should be members. |
| OD16 | The annex is a good start and represents good operational practice. The detail requires further work. |
| OD17 | On-going. |
| Od20 | See earlier comments. |
| OD22 | See OD9. |

ITU-T SG2 looks forward to the collaboration with RG-WM on this draft Recommendation.

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