

ESOA Response to the ITU Consultation on the GSR-20 “The gold standard for digital regulation”

Repairing the digital economy sustainably and meeting social goals in the post-Covid economy requires:

1. **Connectivity for All to be prioritized as an Objective in itself;**
2. **Polymakers to be BOLD and take pragmatic and responsible decisions to implement solutions that have proven their capability to connect people quickly;**
3. **Regulators to (i) ensure key satellite spectrum bands remain available to support broadband, mobility and mission-critical services that require access to satellite and (ii) that decisions made in times of crisis are not used as a way to bypass due regulatory process;**
4. **Governments to ensure their networks are resilient to support the communications needs of future emergencies;**
5. **Polymakers to involve all stakeholders and ensure that policymaking reflects all views; not just the most politically powerful.**

The above points are elaborated below.

1. PRIORITIES: The present economic and social climate has highlighted the need to prioritize *Connectivity for All* as an objective in itself.

While for many, life in the COVID-19 era provided a demonstration of the flexibility and importance of existing telecommunication networks, it also shone a light on those who were left out; those who were without work as they could not work from home; those who could not communicate with their loved ones lying sick in hospital; the elderly/grandparents who suffered through isolation from their families; and those whose children could not follow online schooling while hundreds of millions others did. We have seen how those on the economic fringe of society have been exposed the most as a result of (i) having rigid regulatory regimes that stall the development of key infrastructure and (ii) not sufficiently prioritising bridging the Digital Divide. The great lesson learned from this is that **Connectivity for All with enabling regulatory frameworks in place should be a top priority for governments and regulators on all continents**. Connectivity is more than just an enabler – it is an equaliser that bridges education, health and social divides. To achieve this goal, there is a need for all technologies to be leveraged.

2. BOLD & PRAGMATIC ACTION: Bridging the Digital Divide requires governments and regulators to be BOLD and take pragmatic action to implement solutions that can connect people in the short-term.

The Digital Divide is not a new challenge for policymakers, yet it continues for around half the world's population. Clearly a new approach is required to overcome it. Just as there is a race to implement AI and 5G, there should also be a race to bridge the Digital Divide with existing solutions that have shown their effectiveness, such as satellite. Satellite broadband is available immediately and can connect users directly to the Internet within a couple of days. Satellite can also enable Community WiFi and backhaul mobile networks within weeks and months rather than years. In striving to deliver the 'best' connectivity to their citizens, policymakers should be mindful that what is 'best' for densely populated areas is unlikely to be best for lower density, isolated and rural areas. Therefore, policymakers should avoid prescribing artificial speed / latency targets that will result in excluding technological solutions that have proven successful in enabling a range of everyday services that people around the world have come to rely on. ***Policymakers should highlight and call for the use of these technologies in full recognition of the immediate and positive impact they can have.*** Essentially, these technologies are

satellite as a standalone solution, satellite enabling community WiFi solutions and satellite backhauling mobile networks including, where desired, 5G. With the dramatic advancements in satellite technologies in recent years, they are a more than viable solution, the impact of which can be felt immediately. “Technology neutrality” on its own has achieved very little in bridging the Digital Divide – it is time to take a pragmatic approach and spell out the solutions that work.

3. SPECTRUM: Satellite services provide essential services on and off land that require unfettered access to key satellite spectrum across all key satellite bands.

During the Pandemic the satellite industry ensured broad connectivity and service continuity for public and private users the world over. In some areas, operators saw up to a 100% increase in traffic over their networks as people moved away from urban areas to work from home. Numerous examples of satellite use during the Pandemic can be found [here](#), ranging from home use to enabling essential services such as healthcare, supporting welfare for those on board ships, providing mobile banking, broadcasting educational material to enable online learning and supporting first responders active during disasters that took place during lockdown. In most cases, ***satellite is being used to provide these services as it is the optimum or even the only technology solution that can do so.*** In order to continue to provide these services and more in the future, policymakers should ensure availability of key satellite spectrum bands: L-, S-, C-, Ku- and Ka-band and looking to the future the Q-V and E bands as well.

4. PREPAREDNESS: Every country needs to be prepared and ensure resilient connectivity is available to its citizens at all times because ‘emergency’ is the new normal. As the Pandemic has shown us, no one is immune to emergency situations and emergencies can take many forms: e.g., a Pandemic and a cyclone¹ at the same time. ***Satellite communications are well-known as being reliable and critical in times of emergency.*** This is why the UN’s Emergency Telecommunications Cluster invited the satellite industry to implement a Crisis Connectivity Charter² which has been activated twice in the last 2 years for cyclones in Mozambique and Vanuatu. Post-Covid however, ‘emergency’ is the new normal. Given the increasing number of emergencies the world has faced in recent years and now with the Pandemic threat, there is no excuse for not being prepared. Preparedness means: (i) ensuring resilient networks are in place and satellite solutions can be activated immediately, when necessary (ii) eliminating red-tape and undue license fees/restrictions on satellite technology (iii) implementing preparedness guidelines including the the NETPs³ from the ITU; and (iv) implementing capacity building, workshops and simulations to ensure relevant sectors and staff are equipped and informed on how to use satellite solutions, in all countries, not just those which are disaster-prone. These actions will help build capacity during peace time, which will be acutely needed during a crisis.

5. LISTEN TO ALL STAKEHOLDERS: All stakeholders need to be consulted in the policymaking process and stakeholders should know that their voice will not be drowned out by those perceived as having greater political weight. Public and private sectors but also civil society; national and international organisations; local and global players, should all be invited to participate in the policymaking process. Positive outcomes will be achieved as long as the process is holistic, sincere, pragmatic, user-centric and ***results-oriented with the sole objective of finding the most beneficial solution for each situation.*** Citizens and users should be at the heart of policymaking.

¹ Cyclone Harold, Vanuatu, April 2020

² <https://news.itu.int/why-itu-is-joining-the-crisis-connectivity-charter-doreen-bogdan-martin/>

³ itu.int/en/ITU-D/Emergency-Telecommunications/Pages/Publications/Guidelines-for-NETPs.aspx