ITU Global Symposium of Regulators (GSR 21)
Best Practices Guidelines - Consultation on regulatory uplift for financing digital infrastructure, access and use.

Submission by the Alliance for Affordable Internet (A4AI)

Introduction
A4AI is honoured to have participated in the **ITU GSR-21 Regional Regulatory Roundtable for Europe and Africa**, held online on 14th April 2021 where we shared a presentation and we also welcome the invitation to be involved in ITU's consultative process of the ITU on "Best Practices Guidelines - Consultation on regulatory uplift for financing digital infrastructure, access and use".

The topics and recommendations outlined below relate to all the aspects outlined in the consultative process, but A4AI's contribution is particularly focused on the specific issue of "inducing new, effective and agile financing mechanisms to digital infrastructure, access and use". More specifically, we address the following topics:(i) "**what new policy and regulatory tools can be leveraged to trigger a multiplier effect on investment**"; (ii) "**how can regulation improve affordability and enhance use?**".

1. **Leverage universality policy instruments that are already in place and/or creating new ones as needed.** Policy instruments to foster universality are already in place in several countries across Europe and Africa. Nonetheless, universal service and access funds (USFs), which are part of such policies, are often used for fiscal purposes or not used at all. USAFs should be used to fund a broader spectrum of providers, including small and medium broadband service providers, as well as community networks and other not-for-profit operators. While USAFs are not a "new tool" *per se*, reforms often need to be promoted to allow for the promotion of the aforementioned changes. A4AI research undertaken in 2018, showed over US$400 million collected to be used towards telecommunications and connectivity investments in Africa was unused despite an overwhelming need for it.

2. **Pay attention to device affordability and use.** The cost of internet-connected devices continues to be a financial barrier preventing many from getting online and denying them meaningful connectivity as outlined in the A4AI's device affordability research 2020. Our research showed that the cost of the cheapest available smartphone represents a large percentage of the average monthly income in most countries. Innovative financing should be encouraged for device ownership, which is part of having meaning connectivity to the internet, a concept for which A4AI advocates. Indeed, the lack of ownership prevents many from accessing the internet on a daily basis, and without the security and privacy that ownership offers. Thus, taxation systems should not, for example, apply excise taxes - generally applied to luxury good e.g. alcohol and tobacco, for example - to mobile phones,

as A4AI argues in the 2020 study [From luxury to lifeline: Reducing the cost of mobile devices to reach universal internet access](#).

3. **Support connectivity in rural and remote areas.** The [Rural Broadband Policy Framework](#), developed by A4AI in partnership with Association of Progressive Communications (APC), Collaboration on International ICT Policy for East and Southern Africa (CIPESA), Digital Empowerment Foundation (DEF) and Facebook, is a resource that was developed precisely to serve to "trigger a multiplier effect on investment"[1] to those areas. The framework provides guidance to policymakers and regulators on how to reach rural populations taking into account their unique connectivity challenges. While many of the recommendations are not exclusive to rural areas, they are crucial to the success of connectivity in those areas. In rural areas, even more than in other areas, there is no "silver bullet for accelerating the rollout of ubiquitous connectivity"[2], as each country and/or region has its own geographic, populational and economic characteristics. Thus, broadband plans should establish concrete targets for these areas, as well as goals related to tracking the progress of policy and regulatory interventions. Further, interventions such as "dig-once" policies and proper rules related to rights-of-way are key to incentivize broadband deployment in these regions.

We would like to encourage you to look at our [Good Practices Database](#), which showcases experiences in Africa, Asia and Latin America, and our [Affordability Reports](#), which are an important part of an ongoing effort by A4AI to measure policy progress toward affordable internet. Further, we suggest you read the publications we have launched over the past years, which can be found in our website - [www.a4ai.org](#).[3]

Thank you for this opportunity and we look forward to further engagement to shape the Best Practices Guidelines.

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[1] Using the consultation's language.

[2] Id.

[3] Suggested readings (not-comprehensive):

A4AI. 2020a. *From luxury to lifeline: Reducing the cost of mobile devices to reach universal internet access - Alliance for Affordable Internet*. [https://a4ai.org/research/from-luxury-to-lifeline-reducing-the-cost-of-mobile-devices-to-reach-universal-internet-access/](#) (16 de agosto de 2020).

———. 2020b. *Meaningful Connectivity Standard*. [https://1e8q3q16vyc81g8l3h3md6q5f5e-wpengine.netdna-ssl.com/wp-content/uploads/2020/05/Meaningful-Connectivity.pdf](#) (27 de maio de 2020).

———. 2020. *Rural Broadband Policy Framework*. [https://a4ai.org/rural-broadband-policy-framework/](#) (23 de julho de 2020).

ITU. 2020. *Connecting Humanity: Assessing Investment Needs of Connecting Humanity to the Internet by 2030*. [https://www.itu.int/myitu/-/media/Publications/2020-Publications/Connecting-Humanity.pdf](#) ***study developed by A4AI***