ICC comments on ITU Strategic Plan for 2020-2023

The International Chamber of Commerce (ICC) recognises the central role the International Telecommunication Union (ITU) has played for more than a century in developing standards for the telecommunications network and ensuring rational use of radio spectrum by all radio services, including safeguarding it from frequency interference.

ICC acknowledges and strongly supports the ITU's continued contributions to the formulation of telecommunications network standards and radio spectrum management. ICC believes the ITU has an ongoing and critical role to play in advancing telecommunications access, density and awareness on a global basis.

As the technology world evolves, ICC encourages the ITU to continue to develop within its core competencies to address technical issues related to next generation networks in all three sectors – telecommunications standards, radio spectrum and development sector. The technical work will be valuable in assisting both developed and developing countries and sector members of the ITU to enable access to radiofrequency spectrum in a harmonized, rational, equitable and economic fashion, including those using satellite orbits; assuring interoperable access to innovative technologies for all citizens; and facilitating sharing of best practices on how technical issues are resolved to support ubiquitous connectivity in developing countries.

ICC is concerned about the expansion of the ITU's work program beyond its original mandate to include virtually any issues related to the Internet infrastructure or the contents, applications, and services that are used on the Internet. These initiatives, many of which are duplication of efforts elsewhere, do not benefit from multistakeholder collaboration and the expertise of the private sector, on which the global functioning and sustainable growth of the digital economy relies. The ITU Telecommunication Standardization Sector (ITU-T) and the ITU Telecommunication Development Sector (ITU-D) have increasingly become more active on Internet governance related policy issues and continue to expand their breadth of technical focus areas.

ICC believes that ITU-T and ITU-D efforts to assume activities and functions performed by other standards organizations and multistakeholder forums on core issues including Internet governance are counterproductive. Such efforts can inhibit cooperation, coordination and collaboration with other groups when it does not recognize or respect preexisting or ongoing work and is seen as attempting to supplant them.

For example, the ITU is expanding its remit into technical areas that other standards organizations not only cover, but actually hold the technical specification for. For example, both the 3rd Generation Partnership Project (3GPP) and the European Telecommunications Standards Institute are finalizing work on 5G standards. Although industry and some governments support these standards and they will be completed by the end of 2017, the ITU continues to develop its own 5G standards within a longer timeframe.

ITU-T is currently covering a broad range of issues such as: cyber security, child online protection, environment, cloud computing, cross-border data, big data, privacy, over the top

(OTT), Internet of things and digital financial services. Study group 3, which should focus on the economic and policy aspects of telecommunications network, is now covering mobile money to give one example. Similarly, the ITU-D's study groups are addressing a variety of topics related to the Internet, including OTT services, Internet Protocol (IP) migration, access to cloud services, smart society and cyber security.

Some within the ITU appear to have taken a broader interpretation of resolutions and the Council's directions and very limited sector member input has taken place. ICC acknowledges that the discussion is complicated by the interest of some sector members in using the ITU as a "one stop shop" for technical standards for all networks and encourages the ITU to continue serving its membership by maintaining a focus on core technical competencies rather than reaching into operational, technical and policy areas for which it lacks a mandate, the requisite expertise, or even the structure necessary to implement such work.

Many of the policy areas that the ITU is now covering are already benefitting from bottom-up, multistakeholder approaches to policy-making, where governments can leverage the expertise of relevant stakeholders such as the private sector, civil society and technical community to generate a deeper understanding of the opportunities and challenges faced.[1] Given that Internet and web standards are developed in other competent organizations, the ITU should seek to develop a spirit of coexistence with non-governmental organizations such as the Internet Engineering Task Force (IETF), W3C, ICANN, 3GPP and the European Telecommunications Standards Institute among others.

The restructuring of the ITU and any changes in its work or scope needs to be achieved in such a way that its work, whether through changes in its treaty, or via study questions within its sectors, do not expand into those Internet or technical standard areas where it does not have the expertise and are already well underway in other organizations. Expanding broadly into areas already covered or out of mandate needlessly strains funds, resources and capacity of others to participate. Therefore when considering a strategic plan for 2020-2023 the ITU should consider the following recommendations when evaluating whether a particular proposed work programme is appropriate for the ITU to undertake:

- ITU activities should ensure first and foremost the effective and efficient fulfillment of its core mission related to telephony and spectrum standards for telecommunications network and ensuring the rational and coordinated use of the radio spectrum by all radio services, including satellite.
- ITU should allocate resources to those activities that are core to its mission and unique role.
- ITU activities should utilize and reference, where appropriate, related work in other groups (e.g. reference technical standards), to build upon already established technical solutions efficiently and to increase the awareness of the important work in other groups that may be of interest to ITU members.
- ITU, wherever possible, should seek to cooperate and collaborate with other global organizations in the various workshops related to Plenipotentiary Resolution 101, 102, and 133.

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[1] *For example the Global Forum on Cyber Expertise See: https://www.thegfce.com/*

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- The ITU should encourage multistakeholder cooperation and approaches to Internet policy development processes and governance and avoid expanding its remit into Internet policy or other technical areas where it does not have the expertise or structure to effectively carry out such work.

ICC would like to thank the ITU for providing the opportunity for stakeholders to share comments on the strategic plan for 2020-2023 and remains available to provide further information and examples of the concerns raised in this submission.

With a membership of over six million companies, chambers of commerce and business associations in more than 100 countries, ICC has demonstrated a consistently strong commitment to both voice the perspectives of businesses worldwide and to work cooperatively with all stakeholders to support and advocate for effective and impactful multistakeholder approaches to digital economy and Internet governance issues.

In this context, ICC encourages the ITU to support the continued fulfilment of the full potential of the Internet and information communication technology in the service of sustainable development through flexible, globally-consistent, and market-driven technical standards developed in close consultation with all stakeholders.

About The International Chamber of Commerce (ICC)

The International Chamber of Commerce (ICC) is the world's largest business organization with a network of over 6 million members in more than 100 countries. We work to promote international trade, responsible business conduct and a global approach to regulation through a unique mix of advocacy and standard setting activities—together with market-leading dispute resolution services. Our members include many of the world's largest companies, SMEs, business associations and local chambers of commerce.

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