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August 15, 2017

**Open Consultation: Public Policy Considerations for OTTs
ITU Council Working Group on International Internet-Related Public Policy Issues**

The United States ITU Association (USITUA) appreciates the opportunity to submit its views in the open consultation on “Public Policy Considerations for OTTs” convened by the ITU Council Working Group on International Internet-related Public Policy Issues (CWG-Internet). Established in 2000, USITUA is an open U.S. industry forum for the discussion of issues and the development views and proposals on International Telecommunication Union (ITU) policy matters. Our membership is comprised of sixty U.S.-based corporations, associations and consultants, who share a vital interest in both policy matters before the ITU and the effective management of the Union.

As the global digital ecosystem continues to evolve at a rapid pace, there are ever-more innovative ways of using multiple platforms to make available to consumers a wide array of services and applications that are fueling economic growth and creating jobs. These changes are significant. They are enabling innovations, transforming economies, lifting productivity and boosting economic growth. Extraordinary opportunities are being created which are benefitting consumers around the world.

In order for these positive economic and social developments to continue, the communications market must be defined by innovation, investment, and competition. The imposition of legacy voice telecommunications regulations on emerging services, whether provided by either OTTs or traditional network operators, will only hinder the roll-out of new services to the detriment of consumers. In addition, market-driven voluntary standards developed by industry in an open and transparent manner will ensure that all users will obtain maximum benefits from OTTs and other emerging services.

As such, USITUA would be greatly concerned if new, top-down and ex-ante regulations are imposed on new and emerging services.

In particular, we would oppose any effort to expand the ITU’s jurisdiction and work program that would negatively impact the roll out of OTTs. Instead, the ITU should focus on its existing core competencies. Expanding the Union’s policy or technical work to include OTTs would further stretch already limited resources that are needed by the ITU to meet its existing responsibilities.