![accessnow logo]

CWG-Internet: Online Open Consultation (December 2020)
Expanding Internet Connectivity

15 December 2020

Introduction

Access Now welcomes this opportunity to address the ITU Council Working Group on International Internet-related Public Policy Issues' (CWG-Internet) relating to expanding internet connectivity.[1] In this submission, we aim to provide a human rights perspective to question (1) What are the challenges and opportunities for expanding internet connectivity, particularly to remote and under-served areas? What are the roles of governments and non-government actors in overcoming these challenges?

Access Now provides thought leadership and policy recommendations to the public and private sectors to ensure the continued openness of the internet and protection of fundamental rights.[2] We are a United Nations (U.N.) ECOSOC accredited non-governmental organization that works to defend and extend the digital rights of users at risk around the world through policy, advocacy, and technology support, grants, legal interventions, and global convenings like RightsCon.

Summary

This submission raises three main points to address the CWG-Internet's first of three questions relating to expanding internet connectivity. First, expanding access to the internet is critical because — as amplified during the COVID-19 pandemic — access to the internet is essential for meaningful participation in daily life. Yet, access to the internet is more than a question about connectivity and coverage areas. Public policies regarding access to the internet must also consider the type and quality of internet accessible, and by whom. Specifically, governments and non-government actors, such as the private sector, must foster a rights-respecting internet underpinned by the principles of universality, openness, security, and affordability, in addition to legislation, policies, and infrastructure, aimed to maintain a resilient and inclusive internet ecosystem.

Second, we cannot achieve the U.N. Sustainable Development Goals (SDGs) without universal access to affordable, open, secure, and high-quality internet.[3] Similarly, we need to better understand the role technology plays in maintaining systems of exclusion, oppression, and marginalization. Digital inclusion must serve as a vehicle to ensure that all individuals and communities have access to and skills to use the internet irrespective of one's intersecting identity.

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[1] United Nations, CWG-Internet: Online Open Consultation (December 2020), ITU, (2020). We have contributed submissions to the CWG-Internet in the past. *See e.g.* Access Now, Response to ITU CWG-Internet Online Open Consultation: Public Policy considerations for OTTs, (19 August 2017).

[2] Access Now, About, (2020).

[3] United Nations, Sustainable Development Goals, The Sustainable Development Agenda (2020); Access Now, More than 3.5 billion left in the dark: why we're still fighting to reach U.N. targets for internet access, (5 November 2020); Access Now, We can't reach the U.N. goals for sustainable development without the internet (22 June 2017).

Third, expanding connectivity and reaching U.N. targets for internet access is necessary for the realization of all of the SDGs.[4] This online consultation is timely presented in 2020, the target year identified in U.N. SDG 9.C calling for universal and affordable internet access in least developed countries. The shortest deadline captured in SDG 9.C reflects an understanding of the urgent need to bring all people online as a means to enable the realization of other rights and goals as indicated in the overall 2030 agenda. A month away from the end of 2020, it is clear that we will fail to meet SDG 9.C amid a pandemic. Yet, if we do not remobilize political will to expand internet access, we will potentially fail to meet all of the SDGs by 2030.

What are the challenges and opportunities for expanding internet connectivity, particularly to remote and under-served areas?

a. Studies on internet connectivity and the SDGs

Experts use coverage of mobile networks as an indicator to measure progress toward SDG 9.C. In 2015, when the SDGs were adopted, 51% of the population in the least developed countries were covered by mobile-broadband signals.[5] By 2019, this number had grown to 79%.[6] This metric fails to account for a number of barriers to connectivity, for even those working or living in covered areas may not be able to afford data plans or secure, non-counterfeit devices, enjoy the citizenship requirements necessary to register a SIM card, or have the privilege to overcome patriarchal and discriminatory cultural norms.

Despite the insufficiency of coverage area as an indicator of adoption and use, even these coverage numbers show the discrepancy between the target and failure to achieve that target. From the start, SDG 9.C represented an ambitious goal, but the COVID-19 pandemic has only shown how necessary it is to reach this target. In 2017, participants in the High-level Political Forum on Sustainable Development (HLPF) had the opportunity to re-think and re-strategize around this goal, while conducting a thematic review focused on eradicating poverty and promoting prosperity in a changing world.[7] The forum covered 7 of the 17 SDGs, including SDG 9. Yet there was little attention to SDG 9.C, even though the 2020 deadline was only three years away. When reviewing SDG 9, participants in the HLPF focused more on producing data on and monitoring progress, than discussing concrete measures aimed to meet U.N targets for internet access and use worldwide.[8]

b. The COVID-19 pandemic

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[4] Access Now, We can't reach the U.N. goals for sustainable development without the internet (22 June 2017).
[5] UN DESA, Statistics Division, SDG 9: Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation, https://unstats.un.org/sdgs/report/2020/goal-09/ (2020).
[6] UN DESA, Statistics Division, SDG 9: Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation, https://unstats.un.org/sdgs/report/2020/goal-09/ (2020).
[7] UN High-Level Political Forum on Sustainable Development, https://sustainabledevelopment.un.org/hlpf
[8] UN High-Level Political Forum on Sustainable Development, 2017 HLPF Thematic Review of SDG 9-C: Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation (2017).

The COVID-19 pandemic has amplified the recognition of the internet as an essential tool for daily life. Governments can no longer hide from the stark reality that those who are disconnected from the internet — deliberately or otherwise — are cut off from exercising a broad range of human rights, including the right to access information, peacefully assemble to defend their human rights, and express opinions.[9] Importantly, SDG 17 acknowledges that "innovative technological development" and "reliable data" are crucial to reach all the goals, and that special, cooperative efforts will best serve the people in developing countries who need it most.

Access to the internet can save lives, particularly during public health crises. Limiting or shutting off access to the internet has obvious problems. When governments shut down or slow access to the internet, or block or restrict access to social media platforms, websites, and other sources, it harms people and interferes with their human rights. This has led the United Nations to condemn internet shutdowns during the COVID-19 pandemic.[10] During this crisis, people need access to the internet to find out how to protect themselves and others, access telehealth services, communicate with their loved ones, and work and learn remotely, among many other things. Internet shutdowns directly interfere with these actions and impede the public health and humanitarian response. It is imperative that governments respond by immediately removing, not imposing, barriers to connectivity.

c. Failure to serve those already at the margins

As half of the world's population remains offline, we are failing not only to meet the ultimate goal of closing digital divides among countries, but also within countries. The lack of internet access disproportionately affects people in under-served and at-risk communities, such as women and girls, people in racial and ethnic minority groups, rural and indigenous populations, and people with disabilities. People in these groups have traditionally been left at the margins of political power, public policies, and investments. That is also the case when it comes to internet infrastructure and connectivity.

According to EQUALS, only 40% of women globally are connected to the internet.[11] Such disparities represent a significant challenge, particularly in some regions of the world. For example, in Africa, "women are less likely than men [...] to have phones with access to the internet, to own computers, to access the internet regularly, or to get news from the internet or by social media."[12] However, geography is not the only indicator that determines whether individuals have tools to participate in the digital age. Scientific researchers found that there is "a strong and persistent political bias in the allocation of [i]nternet coverage across ethnic groups worldwide."[13] Other indicators impacting an individual's access to the internet, including race, must also be considered. For instance, according to the PEW Research Center Internet and Technology, "92% of Whites nationally used the internet in

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[9] Access Now, Defending peaceful assembly and association in the digital age: takedowns, shutdowns and surveillance, (July 2020).
[10] Michelle Bachelet, COVID Is "a Colossal Test of Leadership" Requiring Coordinated Action, High Commissioner Tells Human Rights Council, United Nations Human Rights Office of the High Commissioner (April 9, 2020) ("I also urge an end to any blanket Internet and telecommunication shutdowns and denials of service.").
[11] EQUALS, EQUALS Homepage, 2020.
[12] Carmen Alpin Lardies, Dominique Dryding and Carolyn Logan, African women have less access to the Internet than African men do. That's a problem, The Washington Post, (8 March 2020).
[13] Access Now, We can't reach the U.N. goals for sustainable development without the internet, (22 June 2017).

2019, compared to 85% of Blacks and 86% of Hispanics."[14] Examining women and girls' experiences with intersecting digital divides, such as race and ethnicity, therefore challenges "the frequent assumption that the uneven global distribution of digital technology can be mitigated by economic forces and incentives," like competition and smart regulations – or deregulation – of telecommunication companies.[15] Such analyses are particularly imperative when discussing women and girls' access to the internet, and the social, economic, and health consequences arising from the COVID-19 pandemic and its aftermath.

In a recent progress report on the SDGs, the U.N. Secretary-General noted "in least developed countries, owing to the high cost and lack of infrastructure, there were nearly no fixed broadband connections. From a health, economic and social perspective, this digital divide is costing developing countries and their peoples dearly during the pandemic."[16] Keeping people disconnected means that we are denying them the ability to access essential services and exercise a wide range of rights, and therefore preventing them from thriving in the digital age. This cycle of repeated exclusion with discriminatory impact affects people's social and economic prospects and their human dignity — to which we are entitled as a part of our basic human rights.

d. Internet shutdowns and lack of investment hinder progress

We are seeing direct government attacks on access to the internet and information and communication technologies (ICTs). The data collected by global the #KeepItOn coalition and documented in Access Now's Shutdown Tracker Optimization Project (STOP) and the Shutdown Stories project, shows that, in 2019, at least 213 internet shutdowns were reported in 33 countries.[17] This means that, compared to previous years, documented internet shutdowns are increasing in number, length, and scale. More recently, we have seen governments perpetrate deliberate internet shutdowns in Ethiopia and Belarus, as part of a set of unlawful strategies in attempts to quell protests and purportedly address conflicts.

Internet shutdowns interfere with the exercise of a broad spectrum of human rights, both online and off. Governments have ordered them in the context of protests and civil and political unrest, using them as a blatant tool to silence dissent, hide rights violations, stop activists, journalists, and human rights defenders from speaking freely, and prevent people from sharing information and organizing political actions. Governments do not appear to understand that internet shutdowns not only have a severe negative impact on people's human rights, they also have a corrosive effect on the economy, hobbling development.

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[14] PEW Research Center Internet & Technology, Internet/Broadband Fact Sheet, (12 June 2019); *See also* National Telecommunications and Information Administration, The State of the Urban/Rural Digital Divide, (10 August 2016).
[15] Nils B Weidmann, Suso Benitez-Baleato, Philipp Hunziker, Eduard Glatz, Xenofontas Dimitropoulos, Digital discrimination: Political bias in Internet service provision across ethnic groups, Science Vol 353 Issue 5304, (9 September 2016) DOI: 10.1126/science/aaf5062; Access Now, We can't reach the U.N. goals for sustainable development without the internet,(22 June 2017).
[16] UN ECOSOC, Report of the Secretary-General towards the SUstainable Development Goals, UN Doc E/2020/57 (28 April 2020) .
[17] Access Now, #KeepItOn Coalition, (2020).

With ongoing conflict, access to the internet and to information is absolutely essential for public safety. Yet, while some governments and telecommunication companies are seeking ways to improve and expand access to a high-quality and high-speed internet, others are moving in the opposite direction.[18] Over the past few months, governments have extended or ordered new internet shutdowns, and have cited the COVID-19 pandemic as a rationale to censor online content, prosecute dissenting voices, and put in place regulatory measures that impede access to a universal, affordable, open, secure, and high-quality internet.

Some countries are also lagging in investment in the infrastructure that would increase access to the internet and ICTs, leading to degraded service. Governments must provide the infrastructure necessary to ensure secure, high-quality, and high-speed connectivity, and that includes promoting digital literacy, affordable and stable services, and trustworthy cybersecurity. The lack of appropriate legal, economic, and social infrastructure may render mobile coverage meaningless. When governments do not invest in internet infrastructure in certain areas — whether inadvertently or deliberately — they prevent people from getting connected. Unless the infrastructure is built and maintained, we will not be able to bring everyone online, by 2030 or ever.

What are the roles of governments and non-government actors in overcoming these challenges?

    a. **Access Now 'connectivity to fight COVID' report & human rights principles for connectivity**

Access Now has published a report, *Expanding connectivity to fight COVID-19: recommendations for governments and telcos* (Access Now connectivity to fight COVID-19 report), that offers a set of recommended practices to foster connectivity.[19] Recognizing the importance of access to the internet to control the spread of the virus, save lives, and allow for the exercise of several rights, we provide a list of dos and don'ts for fostering meaningful access to the internet.

This follows our work in 2016 to publicize the Human Rights Principles for Connectivity and Development, which has human rights-based guidance for the design and implementation of development projects to build infrastructure, enhance connectivity, and achieve the SDGs.[20] The 9 principles that we advance are addressed to financial institutions and cover key connectivity concerns, such as privacy and public participation. We continue to encourage leaders of governments, development banks, and private-sector companies to ground their efforts to promote connectivity on this set of principles, ensuring a human rights-based approach to development, without which the SDGs cannot be reached.

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[18] Access Now, Expanding Connectivity to Fight COVID-19: Recommendations for Governments and Telcos (April 2020).
[19] Access Now, Expanding Connectivity to Fight COVID-19: Recommendations for Governments and Telcos (April 2020).
[20] Access Now, The Human Rights Principles for Connectivity and Development, (October 2016).

b. **Recommendations for governments from Access Now 'connectivity to fight COVID' report[21]**

Do not shut down the internet under any circumstances: Internet shutdowns are especially harmful at a time when access to the internet is imperative to survive the COVID-19 pandemic and to operate in modern life. There should be no deliberate internet shutdowns anywhere, and all such shutdowns and restrictions should immediately be lifted. Governments should take extra measures to ensure that people in at-risk groups (such as people in low-income communities, refugees, and others) are not disconnected from the internet. Where they have been disconnected, access should be swiftly restored so they can reconnect.

Ensure access to an open internet: People should be free to access information from a variety of sources without interference, and neither governments nor telcos should manipulate network traffic to silence or favor particular voices or content, for profit, political advantage, or other reasons. To protect a free and open internet, governments should pass and enforce strong Net Neutrality rules, prohibiting blocking, throttling, paid priority, and zero-rating content, and disallowing the circumvention of those rules through manipulation of interconnection points. Any network management that is necessary and directly caused by quarantine-related network congestion should be application-neutral and temporary, lasting only through the end of the congestion period. In addition, governments should permanently lift bans and blocks of lawful websites and applications, particularly communications platforms, as stay-at-home and similar quarantine orders make these services essential for people to remain connected.

Make it easier for people, particularly those in low-income communities, to access the internet: Governments should develop or expand emergency funding to help broaden connectivity initiatives, both to help ensure infrastructure build-out (including to anchor institutions like schools and libraries) and to increase the affordability of connections. This may include direct infusions of capital or government subsidies to individuals for internet access. During the COVID-19 pandemic, governments should seek to deploy the resources of Universal Service Obligation Funds or other equivalent programs, exploring ways they can be used to cover data usage by individuals, especially women and girls, and those from low-income or otherwise under-represented communities.[22] Where regulatory changes or legal authorizations may be required, governments should expeditiously seek the approval of such measures. The new connections should be forward-looking and future-proof, and the funding should be easy to access. Governments should require telcos not to disconnect anyone for pandemic-related reasons. Voluntary agreements like those instituted by the U.S. Federal Communications Commission is a step in the right direction but a mandatory requirement will better protect people.[23] Governments should remove barriers to access to technology like mandatory SIM card registration. Mobile phones and laptops, where possible, should be made available to those in

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[21] NB: Reports attached as annexure to this submission.
[22] Alliance for Affordable Internet, Universal Service and Access Funds: An Untapped Resource to Close the Gender Digital Divide, (March 20, 2018).
[23] *See* Order of the Governor of the State of Maryland, (2020). ("No … telephone, … cable television, … or internet service provider … shall terminate the service of a [residential] customer.").

need. Women and girls, often afforded fewer opportunities to control ICT devices, should receive targeted support to ensure that digital access and literacy levels grow despite the crisis.[24]

Avoid relaxing or repealing pro-consumer policies like Net Neutrality and privacy protections: Regulators may be tempted to reduce regulatory "burdens" on telcos during the COVID-19 pandemic, but now is not the time to sacrifice human rights and the basic principles that underlie the internet, risking negative repercussions that last well beyond the crisis. Governments should avoid making these types of policy changes.

Allow temporary use of unused wireless spectrum to improve internet service: Temporary use of certain bands of spectrum may help address a COVID-19-related increase in network traffic (particularly wireless), but a policy for such allowance should revert to the prior regime once the COVID-19 pandemic is over, and the temporary use should not impact unlicensed bands

Encourage the growth of community networks and internet infrastructure: Governments, particularly municipalities, should consider creating their own networks and investing in infrastructure, especially where private telcos cannot or will not ensure high-quality internet access. Governments should also ease restrictions on publicly owned or publicly run networks.

c. **Recommendations for telecommunications companies from Access Now 'connectivity to fight COVID' report**

Ease financial burdens for customers: During COVID-19, telcos that have the means should waive all fees related to an inability to pay, including overage fees, late fees, and subscription fees. Waived fees should not be contingent on signing contracts for future service and should not be required to be repaid in the future. Telcos should also waive fees and relax deadlines on device activation, replacement, return, and repair.

Improve service offerings and remove limits on subscription plans: Telcos should lift limits around total voice or text allowances, data allowances, the types of content people can access, times during which people can use the network, and the expiration of unused data, for at least the duration of the COVID-19 pandemic. In service offerings, telcos should also increase speeds and capacity during the pandemic.

Ensure the internet is open, following the principles of Net Neutrality: Telcos should offer access to an open internet — that is, with no blocking, throttling, or paid priority and zero-rated access — and they should not circumvent these rules through manipulating interconnection points. Especially during a pandemic, telcos should not pick winners and losers in an information ecosystem and act as the arbiters of what information is important to users. Instead of zero-rating or giving priority to certain content or services, telcos should remove data caps. At minimum, telcos should refrain from

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[24] *See* In Tech-Driven 21st Century, Achieving Global Development Goals Requires Closing Digital Gender Divide, UN News (15 March 2019).

zero-rating content they produce, own, or have received compensation or entered into arrangements to market or promote.

Be transparent about policies and practices: Telcos should notify customers directly of policies and practices they implement in response to the COVID-19 pandemic; it is not sufficient to have only a general pandemic website. They should also provide updates as necessary and communicate about any changes in real time throughout the crisis. If possible, they should implement all new connectivity-related policies immediately and automatically, without requiring customers to jump through burdensome hoops. The policies telcos put in place should be easy to understand and not dependent on the day of the week, time of day, or other arbitrary attribute.

Invest in maintaining and improving networks to ensure high-quality internet access now and in the future: Investment should go beyond creating public Wi-Fi networks. While such Wi-Fi access can be helpful in specific situations, people need access to high-quality, high-speed internet at home to use the internet to its fullest potential, including for remote work and education. Using public Wi-Fi networks often requires close proximity to the router and thus to other people, which goes against social distancing policies. No one should have to risk their lives to connect to the internet. Telcos should upgrade their networks to support an increased number of connections. Network equipment and resources should be redistributed as appropriate to increase connectivity.

Conclusion

We are poised to enter the Decade of Action. Now, more than ever, we must boost our efforts to reach SDG 9.C, and this is likely to require coming up with new solutions for old problems. It is crucial to ensure that diverse stakeholders — including governments, international organizations, and civil society organizations — are involved in conversations that will guarantee the race for better connectivity is not blind to human rights implications and impact. We cannot achieve the SDGs without universal access to affordable, open, secure, and high-quality internet. The COVID-19 pandemic has amplified the urgency to mobilize political will to expand access to the internet to ensure everyone can meaningfully participate in daily life.

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EXPANDING CONNECTIVITY TO FIGHT COVID-19: RECOMMENDATIONS FOR GOVERNMENTS AND TELCOS

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Access Now defends and extends the digital rights of users at risk around the world. By combining direct technical support, comprehensive policy engagement, global advocacy, grassroots grantmaking, and convenings such as RightsCon, we fight for human rights in the digital age.

Expanding connectivity to fight COVID-19: recommendations for governments and telcos

April 2020

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Executive Summary

Access Now is committed to protecting human rights and helping guide governments' responses to the coronavirus (COVID-19) pandemic. These responses must promote public health, prevent discrimination, and ensure access to reliable and timely information; defend unrestricted access to an open, affordable, and secure internet; ensure the enjoyment of freedom of expression and of opinion; and protect privacy and personal data.

Both international and domestic laws recognize that extraordinary circumstances require extraordinary measures. The COVID-19 pandemic is such an extraordinary circumstance, and it requires that telecommunications companies ("telcos") and governments take extraordinary measures to ensure that people are not cut off from internet or phone service, often their lifeline to vital resources. To keep people safe and healthy in the context of physical distancing and lockdown measures, governments and telcos must work together to provide everyone, and especially women, girls, and others in under-represented and at-risk communities, access to an affordable, open, secure, stable, and high-speed internet.

As COVID-19 continues to spread, governments and telcos around the world are taking a variety of approaches to internet connectivity, some beneficial and some harmful to human rights and public health. Below, we discuss some of these approaches and provide recommendations to help decision-makers increase connectivity and save lives.

I.   Introduction

Since late 2019, the world has been fighting the novel coronavirus, COVID-19, now recognized by the World Health Organization (WHO) as a pandemic.[1] As part of the response, governments and telecommunications companies ("telcos") around the world have been trying to determine how to improve internet connectivity to help ensure people can communicate and access the information and services they need to live. The decisions they make, and the extent to which they can ensure everyone access to an affordable, open, secure, stable, and high-speed internet connection, will be critical for dealing with the crisis and will help determine how quickly our global society can recover.

In the present context it is imperative that everyone, especially those in under-served and at-risk communities, such as low-income people, have access to a high-quality internet connection. Prior to the COVID-19 outbreak, many services for daily functioning in societies around the world, such as banking, had long ago moved online. The internet today is an essential tool for employment, education, health, communication, political engagement, and accessing a wide array of important resources. Moreover, those without a connection are cut off from enjoyment of a broad range of

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[1] *WHO Timeline - COVID-19*, World Health Organization (April 27, 2020),
https://www.who.int/news-room/detail/08-04-2020-who-timeline---covid-19.

human rights, including the right to access information. Yet only 54% of the world's population has an internet connection, despite the fact that 193 countries have signed on to the United Nations Sustainable Development Goals, including Target 9.c, which calls to "significantly increase access to information and communications technology and strive to provide universal and affordable access to the internet in least developed countries by 2020."[2]

The COVID-19 pandemic has only made the need for high-quality internet access more clear and urgent. The effort to stop the spread of the disease and "flatten the curve" requires that people stay home and access information and vital services online, in what the U.N. Secretary General calls a move to "mass digitalization."[3] In this movement, existing inequalities are becoming more evident; we are all in this together, but not equally. People who have an internet connection and can work remotely are less likely to suffer economic hardship than those who do not.[4] It is also easier for them to follow public health guidelines for stay-at-home orders and self-quarantine. Yet we must all act collectively to fight the spread of this disease. At a time when both physical distancing and access to information is necessary to save lives, it is not acceptable for anyone to navigate the situation isolated and without a high-quality internet connection.

Over the past few months, governments and telcos have each taken a variety of approaches to connectivity during COVID-19. In this report, we highlight some of these responses and offer recommendations for decision-makers to expand connectivity and promote an effective global public health and humanitarian response.

II.   How telecommunications providers are responding

Telco providers, including those run by government entities, play a critical role in COVID-19 pandemic response. They are best able to determine what temporary relief they can provide to their subscribers, how they can entice new subscribers to their network, and how to ensure that as many people as possible have access to a high-quality internet in these difficult times. All telcos should be thinking about how they can help their communities and subscribers get connected. A pandemic is not the time to maximize revenue to the detriment of public health, human rights, and the broader economy.

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[2] *ICT Statistics: Individuals Using the Internet*, International Telecommunications Union, https://www.itu.int/en/ITU-D/Statistics/Pages/stat/default.aspx; Sustainable Development Goal 9: Build resilient infrastructure, promote sustainable industrialization and foster innovation, United Nations, https://www.un.org/sustainabledevelopment/infrastructure-industrialization.

[3] Mario Villar, *UN Chief: Post-Coronavirus World Will Be Even More Digital*, EURACTIV (April 3, 2020), https://www.euractiv.com/section/coronavirus/news/un-chief-post-coronavirus-world-will-be-even-more-digital.

[4] See Lesley Chiou & Catherine Tucker, *Social Distancing, Internet Access and Inequality*, National Bureau of Economic Research, https://www.nber.org/papers/w26982.pdf ("the combination of having both high income and high-speed Internet appears to be the biggest driver of propensity to stay at home. Our results suggest that the digital divide — or the fact that income and home Internet access are correlated — appears to explain much inequality we observe in people's ability to self-isolate.").

So far, telcos have taken a variety of approaches to pandemic response, in some cases moving quickly, and acting in ways that have ranged from helpful to harmful. Below, we discuss several case studies from around the globe, and then provide recommendations to strengthen and improve response.

Case studies

Middle East and North Africa	In **Tunisia**, Tunisie Telecom launched the #Men_Dari ("from my house") initiative, designed to support Tunisians during the country's confinement period by reducing the price of internet connection and increasing speeds.[5] It also announced plans to increase international bandwidth from below 300 Gbps to 350 Gbps and may increase its national backbone.[6]
	In **Saudi Arabia**, Saudi Telecom, Mobily (Etisalat), and Zain Saudi Arabia are waiving telecom bills for their customers in quarantine for the month of April.[7]

Latin America	In **Argentina**, the National Communications Authority (ENACOM), Argentine Satellite Solutions Company, and several other telcos announced an agreement to ensure connectivity during a mandatory isolation period.[8] The agreement allows operators to divert data traffic to each other's networks, if needed, to manage increased network traffic.
	In **Costa Rica**, Movistar is providing both prepaid and postpaid customers with free browsing (zero-rated access) for video learning and collaboration tools

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[5] *#Men_Dari de Tunisie Telecom pour Accompagner les Tunisiens durant leur Confinement*, WebManagerCenter (March 31, 2020), https://www.webmanagercenter.com/2020/03/31/447092/men_dari-de-tunisie-telecom-pour-accompagner-les -tunisiens-durant-leur-confinement; see also *Tunisie Telecom: Vérifiez en Ligne la Capacité Maximale du Débit que Supporte Votre Fixe*, Tunisie Haut Debit (February 4, 2020), https://thd.tn/tunisie-telecom-verifiez-en-ligne-la-capacite-maximale-du-debit-que-supporte-votre-fixe.
[6] *MEA Telecom Operators Offering Support During Coronavirus Pandemic*, Verdict (March 25, 2020), https://www.verdict.co.uk/mea-telecom-coronavirus.
[7] Chris Kelly, *Saudi Telcos to Provide Free Connectivity for Citizens under Quarantine during April*, CommsMEA (April 1, 2020), https://www.commsmea.com/business/financials/21632-saudi-telcos-to-provide-free-connectivity-for-citizens- under-quarantine-during-april.
[8] *Internet en Cuarentena: El Enacom, Arsat y las Compañías de Telecomunicaciones Anuncian un Acuerdo para Asegurar la Conectividad*, La Nación (April 2, 2020), https://www.lanacion.com.ar/tecnologia/internet-cuarentena-enacom-arsat-companias-telecomuncaciones-an uncian-nid2350175.

	including Zoom, Skype, Microsoft Teams, Google Hangout, BlueJeans, and WebEx.[9]

Europe	In **Italy**, Telecom Italia and the government's telecom company, Infratel, are accelerating efforts to improve broadband access in rural areas that currently lack acceptable broadband connections, aiming to deploy fiber networks in up to 320 municipalities by May.[10]
	In **Belgium**, Telenet and Proximus have opened public connections to help children of families without internet connections stay online.[11]

Africa	In **South Africa**, in response to increased network load, VodaCom SA plans to invest R500m in its network to expand smart energy management solutions, increase capacity, and improve network resiliency. It also cut the prices of some of its plans and zero-rated "essential" services.[12]
	In **Zambia**, Zamtel is offering all mobile prepaid customers "complementary five calling minutes, 50 Mb of data and a further ten on-net SMSs on Tuesdays, Thursdays and Sundays while the COVID-19 pandemic lasts."[13]
	In **Kenya**, SafariCom is offering data-capped plans with zero-rated educational resources up to 250MB per day for 60 days.[14] SafariCom has also doubled the internet speed of its home broadband customers, free of charge.[15]

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[9] *Measures Taken by Telefónica in the Fight against COVID-19: Costa Rica*, Telefónica, https://www.telefonica.com/ext/westayconnected/index.html.

[10] *TIM and Infratel Speed Up Rural Fibre Rollouts*, Comms Update (April 3, 2020), https://www.commsupdate.com/articles/2020/04/03/tim-and-infratel-speed-up-rural-fibre-rollouts.

[11] *Telenet et Proximus Ouvrent Leurs Connexions Publiques aux Élèves sans Internet*, Médias de Bruxelles (March 26, 2020) https://bx1.be/dossiers/coronavirus/telenet-et-proximus-ouvrent-leurs-connexions-publiques-aux-eleves-sans-internet.

[12] *Vodacom SA to Spend R500-million on Network as Traffic Increases*, ITWeb (April 15, 2020), https://itweb.africa/content/o1Jr5Mx96X9qKdWL.

[13] Michael Malakata, *Zamtel Launches Fresh Offering as Subscribers Feel the Pinch*, ITWeb (April 9, 2020), https://itweb.africa/content/LPwQ5Ml6mrpvNgkj.

[14] *Safaricom, Education Content Providers Partner to Enable Free Access to Digital Learning*, Safaricom (April 2, 2020), https://www.safaricom.co.ke/about/media-center/publications/press-releases/release/919.

[15] Dennis Waweru, *Exclusive: Safaricom Doubles Home Fiber Speeds for Current Customers*, Gadgets Africa (March, 17, 2020), https://gadgets-africa.com/2020/03/17/safaricom-doubles-home-fibre-speeds-for-current-customers.

Asia-Pacific	In **India**, Airtel is giving those working from home because of the COVID-19 pandemic unlimited data at 1 Gbps speeds over their fiber network.[16] Airtel, Reliance Jio, and Vodafone are improving their wireless plans with more speed and data and extending validity packs.[17]
	In **Nepal**, Nepal Telecom is extending billing deadlines and waiving penalties for late payments during lockdown.[18]

North America	In **Canada**, TELUS, Rogers, and Bell are taking several actions, such as removing data caps and waiving overage fees during the COVID-19 pandemic.[19]
	In the **United States**, Verizon removed data caps on its Fios and DSL offerings;[20] T-Mobile increased free data allowance for schools and students;[21] and AT&T

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[16] Saba Haider, *India under 21-day COVID-19 Lockdown: Know What Airtel, Reliance Jio and Vodafone Offering*, Gadget Bridge (March 29, 2020),
https://www.gadgetbridge.com/news/india-under-21-day-covid-19-lockdown-know-what-airtel-reliance-jio-and-vodafone-offering.

[17] Yuthika Bhargava, *Telecom Operators Extend Validity of Packs Till End of Shutdown*, The Hindu (April 18, 2020),
https://www.thehindu.com/business/Industry/telecom-operators-extend-validity-of-packs-till-end-of-lockdown/article31372694.ece.

[18] *Nepal Telecom to Extend the Deadline for Billing During Lockdown*, My República (March 26, 2020),
https://myrepublica.nagariknetwork.com/news/nepal-telecom-to-extend-the-deadline-for-billing-during-lockdown.

[19] Carli Berry, *TELUS, Rogers, Bell Waiving Fees, Providing Free TV Channels to Customers During Pandemic*, Infotel News (April 11, 2020),
https://infotel.ca/newsitem/telus-rogers-bell-waiving-fees-providing-free-tv-channels-to-customers-during-pandemic/it72111.

[20] *Verizon Response to COVID-19: What is Verizon Doing to Help Customers?*, Verizon,
https://www.verizon.com/about/news/covid-response-customers.

[21] *T-Mobile Update on COVID-19 Response*, T-Mobile (March 13, 2020),
https://www.t-mobile.com/news/t-mobile-update-on-covid-19-response.

waived overage fees for domestic plans if subscribers seek a waiver.[22] All three also signed the "Keep Americans Connected" pledge, written by the U.S. Federal Communications Commission, along with 650 other telcos.[23]

Google has pledged to help students in rural **California** stay connected by providing free Wi-Fi to 100,000 families for the rest of the school year, and giving out 4,000 Chromebooks to students.[24] Similarly, in **Austin, Texas**, the city school district is sending out 110 buses equipped with Wi-Fi for use between 8 a.m. and 2 p.m. to help students in neighborhoods with limited connectivity.[25]

In **North Dakota**, the BEK Communications co-op is offering free internet for four months to new subscribers and is doubling internet speeds for no additional charge.[26]

Recommendations for telcos

Ease financial burdens for customers.	During COVID-19, telcos that have the means should waive all fees related to an inability to pay, including overage fees, late fees, and subscription fees. Waived fees should not be contingent on signing contracts for future service and should not be required to be repaid in the future. Telcos should also waive fees and relax deadlines on device activation, replacement, return, and repair.

[22] *COVID-19: Our Responses*, AT&T, https://about.att.com/pages/COVID-19.html#networkl.
[23] *Keep Americans Connected Pledge*, Federal Communications Commission, https://www.fcc.gov/keep-americans-connected.
[24] Jon Porter, *Google Donates Free Chromebooks and 100,000 Mobile Hotspots for Rural California Students*, The Verge (April 2, 2020), https://www.theverge.com/2020/4/2/21204057/google-free-chromebooks-wi-fi-hotspots-california-schools-students-remote-learning-coronavirus.
[25] Andy Jechow, *Austin ISD Is Rolling Out 110 Buses Equipped with Wi-Fi for Neighborhoods with Limited Online Access*, KUT (April 10. 2020), https://www.kut.org/post/austin-isd-rolling-out-110-buses-equipped-wi-fi-neighborhoods-limited-online-access.
[26] *BEK Communications "BEK Cares" Initiative in Response to COVID-19 Creates a Connection to the World for Rural Students and Work-From-Home Residents*, BEK Communications (March 25, 2020), https://cdn.bek.coop/bek-communications-bek-cares-initiative-3.24.2020.pdf.

Improve service offerings and remove limits on subscription plans.	Telcos should lift limits around total voice or text allowances, data allowances, the types of content people can access, times during which people can use the network, and the expiration of unused data, for at least the duration of the COVID-19 pandemic. In service offerings, telcos should also increase speeds and capacity during the pandemic.
Ensure the internet is open, following the principles of Net Neutrality.	Telcos should offer access to an open internet — that is, with no blocking, throttling, or paid priority and zero-rated access — and they should not circumvent these rules through manipulating interconnection points. Especially during a pandemic, telcos should not pick winners and losers in an information ecosystem and act as the arbiters of what information is important to users. Instead of zero-rating or giving priority to certain content or services, telcos should remove data caps. At minimum, telcos should refrain from zero-rating content they produce, own, or have received compensation or entered into arrangements to market or promote.
Be transparent about policies and practices.	Telcos should notify customers directly of policies and practices they implement in response to the COVID-19 pandemic; it is not sufficient to have only a general pandemic website. They should also provide updates as necessary and communicate about any changes in real time throughout the crisis. If possible, they should implement all new connectivity-related policies immediately and automatically, without requiring customers to jump through burdensome hoops. The policies telcos put in place should be easy to understand and not dependent on the day of the week, time of day, or other arbitrary attribute.
Invest in maintaining and improving networks to ensure high-quality internet access now and in the future.	Investment should go beyond creating public Wi-Fi networks. While such Wi-Fi access can be helpful in specific situations, people need access to high-quality, high-speed internet at home to use the internet to its fullest potential, including for remote work and education. Using public Wi-Fi networks often requires close proximity to the router and thus to other people, which goes against social distancing policies. No one should have to risk their lives to connect to the internet. Telcos should upgrade their networks to support an increased number of connections. Network equipment and resources should be redistributed as appropriate to increase connectivity.

III. How governments and regulatory agencies are reacting

In implementing policy on connectivity during COVID-19, governments have tremendous power to either protect or harm their citizens. For example, legislators, ministers, telecom regulators, and many other public officials can protect people against private-sector abuses such as price gouging, and can enact policies or provide relief to expand and improve access to the internet and make it more affordable. Unfortunately, some government officials are carrying out harmful acts. They are shutting down the internet, engaging in online censorship, levying heavy taxes for access to online platforms, and imposing other restrictions that make it difficult to access and use the internet.

Access to the internet can save lives, particularly during public health crises. Limiting or shutting off access to the internet has obvious problems. When governments shut down or slow access to the internet, or block or restrict access to social media platforms, websites, and other sources, it harms people and interferes with their human rights. This has led the United Nations to condemn internet shutdowns during the COVID-19 pandemic.[27] During this crisis, people need access to the internet to find out how to protect themselves and others, access telehealth services, communicate with their loved ones, and work and learn remotely, among many other things. Internet shutdowns directly interfere with these actions and impede the public health and humanitarian response. It is imperative that governments respond by immediately removing, not imposing, barriers to connectivity.

Government responses in the wake of COVID-19 outbreak have been varied and multi-faceted, with some responding relatively quickly. Following are several case studies from around the globe, broken down into three categories: internet shutdowns, censorship of content, and other regulatory responses. In some cases, the responses have both positive and negative implications. We provide recommendations based on these examples to help governments improve their approaches.

Case studies: internet shutdowns

Asia-Pacific	In **India**, since August 2019, the government has imposed internet restrictions in the Jammu and Kashmir regions, leaving people without reliable, secure access to an open internet. The government originally implemented a blanket shutdown. After India's Supreme Court intervened, the government restored

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[27] Michelle Bachelet, *COVID Is "a Colossal Test of Leadership" Requiring Coordinated Action, High Commissioner Tells Human Rights Council,* United Nations Human Rights Office of the High Commissioner (April 9, 2020), https://www.ohchr.org/EN/NewsEvents/Pages/DisplayNews.aspx?NewsID=25785&LangID=E ("I also urge an end to any blanket Internet and telecommunication shutdowns and denials of service.").

access, but only to 2G mobile internet. As a result, medical staff in the region have been unable to help patients online, download medical data and information about COVID-19 intensive care units guidelines, and otherwise adequately respond to the pandemic.[28]

In **Myanmar**, since mid-2019, authorities have cut or restricted access to the internet in Rakhine and Chin states, leaving people unable to access the internet during the longest shutdown globally in 2019 (now extended to 2020).[29] The government has expanded network disruptions to more townships in these states[30] and issued new orders to censor content and information.[31]

In **Bangladesh**, the government has shut off mobile internet connections in refugee camps where Rohingya refugees reside, and disallowed these refugees, who are in close quarters and a high-risk group for COVID-19, from use of SIM cards and other communication tools.[32]

In **Pakistan**, authorities have ordered internet shutdowns in former Federally Administered Tribal Areas (FATA) of Pakistan and part of Balochistan, disconnecting residents of these two regions from the rest of the world. Reports indicate that while the majority of students in Pakistan have transitioned to online schooling, students residing in ex-FATA and Balochistan regions have been left behind due to the lack of internet access.[33]

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[28] Majid Maqbool, *'An Hour to Download ICU Guidelines': Amid COVID-19, Kashmir Doctors Struggle With Slow Internet*, The Wire (March 20, 2020), https://thewire.in/rights/coronavirus-kashmir-slow-internet.

[29] *Myanmar: Lift Internet Restrictions to Protect Public Health*, Fortify Rights (March 26, 2020), https://www.fortifyrights.org/mya-inv-2020-03-26.

[30] Thu Thu Aung & Sam Aung Moon, *Myanmar Reimposes Internet Shutdown in Conflict-torn Rakhine, Chin States: Telco Operator* (February 5, 2020), https://www.reuters.com/article/us-myanmar-rakhine/myanmar-reimposes-internet-shutdown-in-conflict-torn-rakhine-chin-states-telco-operator-idUSKBN1ZZ0LC.

[31] *Blocking of 230 Websites in Myanmar Based on Directive from the Authorities,* Telenor (March 30, 2020), https://www.telenor.com.mm/en/article/blocking-230-websites-myanmar-based-directive-authorities.

[32] *Bangladesh: Internet Blackout on Rohingya Refugees*, Human Rights Watch (September 13, 2019), https://www.hrw.org/news/2019/09/13/bangladesh-internet-blackout-rohingya-refugees.

[33] Umar Daraz Wazir, *DRM Exclusive: Internet Shutdown in Former FATA – Online Classes a Hurdle to Right to Education of Students in the Region*, Digital Rights Monitor (April 20, 2020), https://digitalrightsmonitor.pk/drm-exclusive-internet-shutdown-in-former-fata-online-classes-a-hurdle-to-right-to-education-of-students-in-the-region.

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Case studies: censorship of content

Asia-Pacific	In **Myanmar**, the government has blocked more than 200 websites. Most recently, the government censored news agencies and those that are serving and based in Rakhine state.[34]

Middle East and North Africa	In **Algeria**, the government has blocked websites for The Maghreb Emergent and Radio M, which provide critical health and other information amidst the COVID-19 pandemic.[35]
	In the **United Arab Emirates**, in response to a COVID-19 lockdown, the Telecommunications Regulatory Authority lifted a block, on an "exceptional" and temporary basis, of several VoIP platforms and applications, such as Google Meet, WebEx, Blue Jeans, and Slack, to allow for distance learning.[36] However, the government continues to block apps such as WhatsApp, Skype, and FaceTime, which have been essential tools for communicating, especially among migrant workers and foreign nationals. Use of VoIP products that are not licensed (those not provided by telcos Etisalat or Du) could be punishable under the cybercrime law.[37]

Latin America	In **Venezuela**, government-owned CANTV, the largest telco in the country, blocked coronavirusvenezuela.info, a website created by the National Assembly to disseminate official information about COVID19.[38] After a fire in a networking facility, the block was lifted.[39] In addition, Movistar Venezuela blocked teleconsulta.presidenciave.org, a website for medical information.[40]

[34] Rebecca Ratcliffe, *Myanmar Blocks Hundreds of News Sites and Threatens Editor with Life in Jail*, The Guardian (April 1, 2020), https://www.theguardian.com/world/2020/mar/31/myanmar-editor-could-face-life-in-jail-for-interviewing-rebel.

[35] *Algeria: Maghreb Émergent and Radio M Online Media Blocking*, The Maghreb Times (April 15, 2020), https://themaghrebtimes.com/04/15/algeria-maghreb-emergent-and-radio-m-online-media-blocking.

[36] *Additional Apps for Distance Learning*, Telecommunications Regulatory Authority (March 30, 2020), https://www.tra.gov.ae/en/media-hub/dgspeech/2020/3/30/additional-apps-for-distance-learning.aspx.

[37] *Freedom on the Net 2017: United Arab Emirates*, Freedom House, https://freedomhouse.org/country/united-arab-emirates/freedom-net/2017.

[38] *Bloquean Sitio Sobre Coronavirus COVID-19 Organizado por la AN y Juan Guaidó*, VE sin Filtro (March 18, 2020), https://vesinfiltro.com/noticias/bloqueado_portal_coronavirus_AN.

[39] Tweet by VE sin Filtro (April 7, 2020), https://twitter.com/vesinfiltro/status/1250581767549059073.

[40] Tweet by VE sin Filtro (April 15, 2020), https://twitter.com/vesinfiltro/status/1250579061937770496.

Europe	In the **European Union**, Market Commissioner Thierry Breton asked CEOs of large platforms (e.g., Netflix and YouTube) to throttle their services to prevent bandwidth issues on the network.[41] The parties made agreements to do so by phone, outside the scrutiny of telecom regulators or legislators. It is not clear whether there is a congestion problem to address, as the Body of European Regulators for Electronic Communications, the E.U. telecom regulator, released a report indicating an increase in overall traffic but no problems in handling it.[42]

Case studies: other regulatory responses

Asia-Pacific	In **Pakistan**, the government directed telcos to offer cheap student and work-from-home packages of 2Mbps with a 40GB data limit at a reasonable rate of less than Rs600 per month.[43]
	In **Thailand**, the government approved a scheme by the National Broadcasting and Telecommunications Commission to provide mobile subscribers with 10GB of free data per month until June 30 if they text a specific number.[44]

Africa	In **Uganda**, since June 2018, the government has been taxing citizens $0.05 *per day* (or approximately 4% of monthly income) to access critical communications and information platforms like Skype, WhatsApp, Facebook, Twitter, and Instagram.[45]

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[41] Igor Bonifacic, *EU Asks Netflix and Other Services to Stream in SD to Ease Internet Burden*, Engadget (March 19, 2020), https://www.engadget.com/2020-03-19-eu-netflix-sd-streaming-to-conserve-internet.html.
[42] *Updated BEREC report on the status of internet capacity in light of Covid-19 crisis*, BEREC (April 6, 2020), https://berec.europa.eu/eng/document_register/subject_matter/berec/press_releases/9247-press-release-upd ated-berec-report-on-the-status-of-internet-capacity-in-light-of-covid-19-crisis.
[43] Ramsha Dahangir, *PTA Asks Internet Providers to Launch Cheap Packages During Outbreak*, Dawn (April 5, 2020), https://www.dawn.com/news/1546558/pta-asks-internet-providers-to-launch-cheap-packages-during-outbreak .
[44] Komsan Tortermvasana, *Mobile Users Get 10GB Perk from April 10*, Bangkok Post (March 31, 2020), https://www.bangkokpost.com/business/1890240/mobile-users-get-10gb-perk-from-april-10.
[45] *Social media is free. But not in Uganda*, Free Social Media, https://freesocial.media/#intro.

North America	In the **United States**, the telecom regulator granted several wireless carriers, including Verizon, AT&T, T-Mobile, and U.S. Cellular, access to additional spectrum to help address the increase in demand.[46] The agency also granted the Indigenous Navajo Nation access to unused airwaves.[47]

Recommendations for governments

Do not shut down the internet under any circumstances.	Internet shutdowns are especially harmful at a time when access to the internet is imperative to survive the COVID-19 pandemic and to operate in modern life. There should be no deliberate internet shutdowns anywhere, and all such shutdowns and restrictions should immediately be lifted. Governments should take extra measures to ensure that people in at-risk groups (such as people in low-income communities, refugees, and others) are not disconnected from the internet. Where they have been disconnected, access should be swiftly restored so they can reconnect.
Ensure access to an open internet.	People should be free to access information from a variety of sources without interference, and neither governments nor telcos should manipulate network traffic to silence or favor particular voices or content, for profit, political advantage, or other reasons. To protect a free and open internet, governments should pass and enforce strong Net Neutrality rules, prohibiting blocking, throttling, paid priority, and zero-rating content, and disallowing the circumvention of those rules through manipulation of interconnection points. Any network management that is necessary and directly caused by quarantine-related network congestion should be application-neutral and temporary, lasting only through the end of the congestion period. In addition, governments should permanently lift bans and blocks of lawful websites and applications, particularly communications platforms, as

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[46] *FCC Grants AT&T and Verizon Further Temporary Spectrum Access to Keep Americans Connected During Coronavirus Pandemic*, FCC (March 20, 2020), https://docs.fcc.gov/public/attachments/DOC-363211A1.pdf; *FCC Provides T-Mobile Temporary Access to Additional Spectrum to Help Keep Americans Connected During Coronavirus Pandemic*, FCC (March 15, 2020), https://docs.fcc.gov/public/attachments/DOC-363051A1.pdf; *FCC Provides U.S. Cellular Temporary Access to Additional Spectrum to Help Keep Americans Connected During Coronavirus Pandemic*, FCC (March 17, 2020), https://docs.fcc.gov/public/attachments/DOC-363114A1.pdf.

[47] *U.S. Grants Navajo Nation Authority to Use Unassigned Airwaves*, Santa Fe New Mexican (April 18, 2020), https://www.santafenewmexican.com/ap/u-s-grants-navajo-nation-authority-to-use-unassigned-airwaves/article_55e26b01-749b-5fa3-b3ef-f673a142ed8b.html.

	stay-at-home and similar quarantine orders make these services essential for people to remain connected.
Make it easier for people, particularly those in low-income communities, to access the internet.	Governments should develop or expand emergency funding to help broaden connectivity initiatives, both to help ensure infrastructure build-out (including to anchor institutions like schools and libraries) and to increase the affordability of connections. This may include direct infusions of capital or government subsidies to individuals for internet access. During the COVID-19 pandemic, governments should seek to deploy the resources of Universal Service Obligation Funds or other equivalent programs, exploring ways they can be used to cover data usage by individuals, especially women and girls,[48] and those from low-income or otherwise under-represented communities. Where regulatory changes or legal authorizations may be required, governments should expeditiously seek the approval of such measures. The new connections should be forward-looking and future-proof, and the funding should be easy to access. Governments should require telcos not to disconnect anyone for pandemic-related reasons. Voluntary agreements like those instituted by the U.S. Federal Communications Commission are a step in the right direction but a mandatory requirement will better protect people.[49] Governments should remove barriers to access to technology like mandatory SIM card registration. Mobile phones and laptops, where possible, should be made available to those in need. Women and girls, often afforded fewer opportunities to control ICT devices,[50] should receive targeted support to ensure that digital access and literacy levels grow despite the crisis.

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[48] *Universal Service and Access Funds: An Untapped Resource to Close the Gender Digital Divide*, Alliance for Affordable Internet (March 20, 2018), https://a4ai.org/research/universal-service-and-access-funds-an-untapped-resource-to-close-the-gender-digital-divide.

[49] See *Order of the Governor of the State of Maryland,* https://governor.maryland.gov/wp-content/uploads/2020/03/Executive-Order-Prohibit-Termination-of-Residential.pdf ("No … telephone, … cable television, … or internet service provider … shall terminate the service of a [residential] customer.").

[50] See *In Tech-Driven 21st Century, Achieving Global Development Goals Requires Closing Digital Gender Divide*, UN News, https://news.un.org/en/story/2019/03/1034831.

Avoid relaxing or repealing pro-consumer policies like Net Neutrality and privacy protections.	Regulators may be tempted to reduce regulatory "burdens" on telcos during the COVID-19 pandemic, but now is not the time to sacrifice human rights and the basic principles that underlie the internet, risking negative repercussions that last well beyond the crisis. Governments should avoid making these types of policy changes.
Allow temporary use of unused wireless spectrum to improve internet service.	Temporary use of certain bands of spectrum may help address a COVID-19-related increase in network traffic (particularly wireless), but a policy for such allowance should revert to the prior regime once the COVID-19 pandemic is over, and the temporary use should not impact unlicensed bands.
Encourage the growth of community networks and internet infrastructure.	Governments, particularly municipalities, should consider creating their own networks and investing in infrastructure, especially where private telcos cannot or will not ensure high-quality internet access. Governments should also ease restrictions on publicly owned or publicly run networks.

IV.   Conclusion

In today's digitally connected world, high-quality internet access is a necessity at all times for all people, including those who are especially at risk, such as people in low-income communities, the disenfranchised, refugees, and others. Getting connected is even more urgent during this global public health crisis, when access to information and physical distancing will save lives. Telcos and governments must step up to protect people by keeping them connected to the internet, consistent with their obligations under international human rights law. This report provides several recommendations for how they can do that. Working together, now and in the aftermath of the pandemic, we can reach the goal of global, universal internet access that benefits everyone.

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THE HUMAN RIGHTS

PRINCIPLES

FOR CONNECTIVITY

AND DEVELOPMENT

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I. INTRODUCTION

`Internet connectivity` is essential for economic, social, cultural, political, and civic participation in the digital age. For the benefits of information and communications technologies to spread equitably and freely, connectivity must occur within a human rights framework.

Our goal in developing the Principles is to prevent, mitigate, and remedy human rights harms that arise in development projects to build internet infrastructure, connect the world to the internet, and achieve the Sustainable Development Goals (SDGs)[1] using information and communications technologies (ICTs). Since more than four billion people lack access to the internet, the largest stakeholder group in these efforts remains unconnected, likely marginalized, rarely consulted, and dangerously at risk of being left behind in the digital age. Our process is open to input and innovation to support the broadest possible participation.

The Principles advanced in this draft are grounded in international human rights law and norms; are consistent with the SDGs as well as development best practices; and are designed to help guide initiatives to increase connectivity to the global internet. We use the term "connectivity" here in recognition of the many programs that aim to spur infrastructure investment and bring all people online by 2020, such as the Global Connect Initiative,[2] Connect the World,[3] and Connect 2020.[4] We intend the term to encompass efforts to provide affordable access to infrastructure, including public access points, as well as policy initiatives and capacity-building programs to enable development and the free and safe exercise of human rights online.

These Principles do not aim to supplant, but rather to build on and adapt, such foundational documents as the Internet Rights and Principles Coalition (IRPC) Charter of Human Rights and Principles for the Internet,[5] the Association for Progressive Communications (APC) Internet Rights Charter,[6] the UN Guiding Principles on Business & Human Rights,[7] and the Council of Europe Guide to Human Rights for Internet Users.[8] They are intended to inform financial institution safeguards like the Overseas Private Investment Corporation's Environmental and Social Policy[9] Statement.

1. http://www.globalgoals.org/#the-goals
2. https://share.america.gov/globalconnect
3. http://connecttheworld.one.org
4. http://www.itu.int/en/connect2020/Pages/default.aspx
5. http://internetrightsandprinciples.org/site
6. https://www.apc.org/node/5677#1
7. https://business-humanrights.org/en/un-guiding-principles
8. https://www.coe.int/en/web/internet-users-rights/guide
9. https://www.opic.gov/sites/default/files/consolidated_esps.pdf

II. THE HUMAN RIGHTS PRINCIPLES FOR CONNECTIVITY AND DEVELOPMENT

Below are the **(9) Principles**, followed by an **elaboration** of the practical applications of each principle in the design and roll out of connectivity programs, and a citation of **sources**.

THE PRINCIPLES

1.

Assessments of connectivity investments must include an evaluation of the impact on human rights.

2.

Investment in connectivity should be deployed hand-in-hand with human rights-based capacity building, public access points, and skills development.

3.

Investors should support connectivity for development that respects human rights.

4.

Investors should only support connectivity for development on the condition that it offers affordable and open access to the whole internet.

5.

Connectivity investments for development must be content-agnostic and facilitate freedom of expression, the enabler of other human rights.

6.

Connectivity investments for development must respect privacy, which is essential for the internet economy.

7.

Projects for connectivity should be undertaken using open, transparent, and inclusive processes.

8.

Connectivity initiatives should remain open to civil society and community participation throughout the life of the project.

9.

Connectivity initiatives must anticipate and offer ways to mitigate human rights harms through rights-respecting oversight and remedy processes.

Please note that this document is in **draft** form and requires input from a broad range of stakeholders.

ELABORATION

Please find each principle followed by a list of practical implications and sources for the principle.

PRINCIPLE 1

Assessments of connectivity investments must include an evaluation of the impact on human rights. Connectivity, development, and human rights are interdependent, and should not be considered in isolation. Those evaluating connectivity investments for development must consider the impact on political, economic, social, and cultural rights.

In practice, this means:

- Projects should deploy social, cultural, and human rights impact assessments for progress checks and ensuring accountability of connectivity processes. Impact assessments should be carried out for all connectivity projects, in close consultation with civil society, affected communities, and human rights experts.
- Connectivity initiatives should promote digital inclusion, with greater focus on rural, native, and poor communities, and proceed with respect for human rights.
- Connectivity indicators should be measured alongside human rights indicators. Connectivity adds significant value when it facilitates human rights.
- Assessors should be sensitive to the challenges of connecting isolated communities to the internet. Training of community leaders and community members will address potential negative impacts.

Sources for the principle:

- *WSIS+10 Outcome Document, 2016: "Progress towards the WSIS vision should be considered not only as a function of economic development and the spread of ICTs but also as a function of progress with respect to the realization of human rights and fundamental freedoms" (Preamble, para 14); "We commit to harnessing the potential of ICTs to achieve the 2030 Agenda for Sustainable Development and other internationally agreed development goals, noting that ICTs can accelerate progress across all 17 SDGs" (ICT for Development, para 17).*
- *Human Rights Council, Resolution 26/13, The promotion, protection and enjoyment of human rights on the Internet, 2014: "Noting also the importance of building confidence and trust in the internet, not least with regard to freedom of expression, privacy, and other human rights so that the potential of the internet as, inter alia, an enabler for development and innovation can be realized."*
- *McKinsey & Co., 2011, Internet Matters: "The internet is a critical element of growth...The internet contributed 7 per cent of growth over the past 15 years, and 11 per cent over the last five."*

Investment in connectivity should be deployed hand-in-hand with human rights-based capacity building, public access points, and skills development. To bridge persistent digital divides will require more than simply extending infrastructure; education is vital for unlocking the full benefits of connectivity for a population.

In practice, this means:

- Identify and promote development models that provide affordable, decentralized, and sustainable access and connectivity.
- Connectivity should be rights-respecting, equitable, inclusive, promote gender equality, and strive to bridge race, class, language, culture, and similar divides. Vulnerable groups should be meaningfully consulted and their human rights robustly protected before and after coming online.
- The value of community anchor institutions such as libraries, universities, and schools as points for public access of the internet should be recognized. As well as helping those who are far from getting access at home, these open and public spaces are also often the place where people first connect, and build the skills and confidence to make the most from the internet. Funding for points of public access should include support for trained staff to provide technical instruction and basic digital literacy skills.
- Initiatives should incorporate capacity-building on privacy, freedom of expression, and other human rights issues into connectivity projects, and facilitate local content creation, innovation, and control.
- Stakeholders leading connectivity initiatives should partner with local communities to ensure the development of local capacities, and the operation of local services and infrastructure. Create and support long term sustainable, autonomous, and community-developed networks, with attention to innovative technologies and spectrum policies.

Sources for the principle:

- *WSIS+10 Outcome Document, 2015: "Many forms of digital divides remain, both between and within countries – as well as between women and men... Divides are often closely linked to education levels and existing inequalities, and we recognize that further divides can emerge in the future, slowing sustainable development."*
- *UN General Assembly, Resolution 68/198, Information and communications technologies for development, 2013: "Recognizing that the lack of capacity-building for the productive use of information and communications technologies needs to be addressed in order to overcome the digital divide"; "Recognizing also that the number of internet users is growing and that the digital divide is also changing in character from one based on whether access is available to one based on the quality of access, information, and skills that users can obtain and the value they can derive..."*

- *Global Commission on Internet Governance, One Internet, 2016: "Government should invest in public access points, which can play a significant role by providing individuals with an opportunity to connect to the internet. The installation of public internet access points should be encouraged in schools, libraries, and other social service venues to ensure that individuals are not prevented from having access due to a lack of tools or available resources. In some instances, central, state, and municipal governments may consider investing in the build-out of access networks, again for the most part where private sector investment is insufficient."*
- *Internet Governance Forum (IGF) Dynamic Coalition on Public Access in Libraries, Principles of Public Access in Libraries, 2015: "Policies and legislation should create an enabling environment for universal access to information by supporting the role of libraries in providing public access to ICTs, internet connectivity, and technology training."*
- *NETmundial Multistakeholder Statement, 2014: "Access and low barriers: internet governance should promote universal, equal opportunity, affordable, and high quality internet access so it can be an effective tool for enabling human development and social inclusion. There should be no unreasonable or discriminatory barriers to entry for new users. Public access is a powerful tool for providing access to the internet."*

PRINCIPLE 3

Investors should support connectivity for development that respects human rights. Human rights apply online just as they do offline. Participation in connectivity initiatives should be conditioned on demonstrated respect for human rights, applicable before, during, and after completion of the project. To ensure sustainability of connectivity projects and avoid partial execution of investments, conditions should be reached through cooperative strategies.

In practice, this means:

- Connectivity initiatives must take into consideration the best practices in relation to human rights impacts. Cooperative strategies involving human rights experts, technologists, local communities, civil society, lawyers, and developers should be prioritized. Developers must respect and abstain from excluding local and autonomous developed networks when deployed.
- Infrastructure developers should consult policy experts in conducting human rights impact assessments, just as policy bodies must reach out to technologists and operations experts in crafting law and regulations.
- Laws need to be consistent in protection of rights online and offline. Disproportionate restrictions that allow for persecution of human rights online and greater penalties for offenses involving ICTs do not comport with international law and norms.
- Convergence between digital and physical worlds requires continued attention to the human rights impacts of connected devices and "things."

- *Human Rights Council, Resolution 20/8, The promotion, protection and enjoyment of human rights on the Internet, 2012: Affirms that the same rights that people have offline must also be protected online, in particular freedom of expression...; "Calls upon all states to promote and facilitate access to the internet and international cooperation aimed at the development of media and information and communications facilities in all countries."*
- *UN General Assembly, Resolution 21/16, The rights to freedom of peaceful assembly and of association, 2012: "Reminds states of their obligation to respect and fully protect the rights of all individuals to assemble peacefully and associate freely, online as well as offline, including in the context of elections, and including persons espousing minority or dissenting views or beliefs, human rights defenders, trade unionists and others, including migrants..."*
- *WSIS+10 Outcome Document, 2015: "We recognize that human rights have been central to the WSIS vision, and that ICTs have shown their potential to strengthen the exercise of human rights, enabling access to information, freedom of expression, and freedom of assembly and association."*

PRINCIPLE 4

Investors should only support connectivity for development on the condition that it offers affordable and open access to the whole internet. The internet is a global resource that must remain open and affordable. Affordability should be set based on local needs and realities. Public, aid, and development-targeted funding should not enable private actors to create walled gardens or employ business models that fail to offer users affordable access to the global internet.

In practice, this means:

- Non-discrimination should be a controlling principle, applying to all layers of the stack, meaning it is the norm for internet access and content regulation as well as infrastructure buildout, and the benchmark to evaluate new business models. Development projects should not discriminate based on a community's political, cultural, ideological, or other affiliations.
- Internet access services should strive to give users open access to the global, end-to-end internet, which is necessary to ensure realization of both rights and development. Providers should not unfairly discriminate, either by giving preference to some users or content over others, or by limiting certain users to a small segment of the internet.
- As the APC Internet Rights Charter declares, "technical standards used on the internet must always be open to allow interoperability and innovation. New technology development must meet the needs of all sections of society, particularly those who face limitations and obstacles when they go online (such as communities who use non-Latin scripts or people with disabilities, older computers or lacking high-speed access)."

- Access to culture and science online brings economic, social, and political benefits, as well as stimulating further creativity and innovation. While ensuring that those who make a living out of their creativity are fairly rewarded, copyright and related rights and tools should not be used to restrict access to information online unduly.

Sources for the principle:

- *Human Rights Council, Resolution 26/13, The promotion, protection and enjoyment of human rights on the Internet, 2014: "Recognizes the global and open nature of the internet as a driving force in accelerating progress towards development in its various forms."*

- *NETmundial Multistakeholder Statement, 2014: "The ability to innovate and create has been at the heart of the remarkable growth of the internet and it has brought great value to the global society. For the preservation of its dynamism, internet governance must continue to allow permissionless innovation through an enabling internet environment... Enterprise and investment in infrastructure are essential components of an enabling environment"; "The internet should be preserved as a fertile and innovative environment based on an open system architecture, with voluntary collaboration, collective stewardship, and participation, and uphold the end-to-end nature of the open internet..."*

- *WSIS+10 Outcome Document, 2015: "We note the important regulatory and legislative processes in some member states on the open internet in the context of the information society and the underlying drivers for it."*

- *Alliance for Affordable Internet, Mobile Data Services: Exploring User Experiences & Perceived Benefits, 2016: "The vast majority of users (82%) prefer access to the full internet with time or data limitations, if restrictions are imposed. Approximately half (48%) of all users said that the restriction they most preferred was a limitation on time (i.e., the free plan would be only be valid for a short time, with no restriction on the websites/apps that could be accessed) ..."*

- *Global Commission on Internet Governance, One Internet, 2016: "Network Neutrality is the principle that internet traffic should be treated equally and that network operators should be prohibited from prioritizing, throttling, or blocking particular types of traffic that flow across their network. The Commission supports the idea that internet traffic should be treated equally, without discrimination, restriction, or interference, independent of the sender, receiver, type, content, device, service, or application."*

- *Report of the UN Special Rapporteur on Cultural Rights, Farida Shaheed, Copyright policy and the right to science and culture, 2014: "In the view of the Special Rapporteur, [...] measures [website blocking, content filtering, and other limits on access to content subject to copyright, as well as the liability imposed on intermediaries for infringing content disseminated by users] could result in restrictions that are not compatible with the right to freedom of expression and the right to science and culture. Additional concern is expressed over the deployment of aggressive means of combating digital piracy, including denial of internet access, high statutory damages, or fines and criminal sanctions for non-commercial infringement. There are also issues of piracy unrelated to the internet. In the Special Rapporteur's opinion, that important topic requires additional study from a human rights perspective."*

Connectivity investments for development must be content-agnostic and facilitate freedom of expression, the enabler of other human rights. The law should promote wide access to content, stable and resilient networks, and sustainable systems.

In practice, this means:

- Governments that routinely censor content, harass journalists, and retaliate against dissidents do not respect fundamental human rights, will not likely extend open and secure access, and should not be entrusted with connectivity funds.
- The spreading "worst practice" of internet shutdowns — intentional disruptions of communications tools, rendering them inaccessible or effectively unusable, for a specific population or within a location, often to exert control over the flow of information — should be condemned at every opportunity.
- Public institutions should endeavor to provide sustainable, long-term preservation of and access to digital information, to guarantee posterity and archival oversight.

Sources for the principle:

- *Report of the Special Rapporteur on the promotion and protection of the right to freedom of opinion and expression, Frank La Rue 2011: "The right to freedom of opinion and expression is as much a fundamental right on its own accord as it is an 'enabler' of other rights, including economic, social, and cultural rights, such as the right to education and the right to take part in cultural life and to enjoy the benefits of scientific progress and its applications, as well as civil and political rights, such as the rights to freedom of association and assembly. Thus, by acting as a catalyst for individuals to exercise their right to freedom of opinion and expression, the internet also facilitates the realization of a range of other human rights."*
- *Human Rights Committee, General Comment No. 34 (interpreting ICCPR Article 19), 2012: "Any restrictions on the operation of websites, blogs, or any other internet-based, electronic, or other such information dissemination system, including systems to support such communication, such as internet service providers or search engines, are only permissible to the extent that they are compatible with paragraph 3.... generic bans on the operation of certain sites and systems are not compatible with paragraph 3."*
- *U.S. State Department, Internet Freedom, 2012: "...the internet helps fuel the global economy, increases productivity, and creates jobs built on the unprecedented global reach that the platform provides for our businesses and innovators. Just as importantly...the internet serves as a powerful platform to bring information and resources to people who historically have been isolated, or their human rights repressed, so they, too, have the chance to become active, prosperous, and engaged participants in the world community."*
- *Human Rights Council, Resolution 32/13, The promotion, protection and enjoyment of human rights on the Internet, 2016: "Also condemns unequivocally measures to intentionally prevent or disrupt access to or dissemination of*

information online in violation of international human rights law, and calls upon all states to refrain from and cease such measures."

PRINCIPLE 6

Connectivity investments for development must respect privacy, which is essential for the internet economy.

In practice, this means:

- Connectivity projects must not contribute to arbitrary or unlawful surveillance. This means ensuring that necessary laws and protections are in place, working with the private sector to make them aware of their responsibilities, and remaining attentive to stakeholder reports of threats to the right to privacy.
- Tech and policy privacy impact evaluations should be carried out on connectivity initiatives before deployment.
- Connectivity initiatives should not fund surveillance technology, but rather should support and allow encryption and anonymity as a baseline for this principle. Export controls should be continually updated and consistently enforced in development projects.

Sources for the principle:

- *World Bank, World Development Report: Digital Dividends, 2016: "Protecting personal data online is key for the data-driven economy, since it will increase trust in the internet, and greater trust will foster more use. And privacy is not just a developed-country issue. ... Data flows nowadays are global, and privacy regimes need to be interoperable with one another to really enable the internet to be an engine of innovation and economic growth."*
- *UN General Assembly, Resolution 69/166, Right to Privacy in the Digital Age, 2014: "Emphasizing that states must respect international human rights obligations regarding the right to privacy...; Noting also that the rapid pace of technological development... enhances the capacity of governments, companies, and individuals to undertake surveillance, interception, and data collection, which may violate or abuse human rights."*

PRINCIPLE 7

Projects for connectivity should be undertaken using open, transparent, and inclusive processes. This includes solicitation processes and public-private partnerships.

In practice, this means:

- All forms of connectivity initiatives, including public-private partnerships, should be accountable to local communities and the public in general.
- The value of the multistakeholder approach also applies to connectivity initiatives, at all levels.

- Interoperable technology and systems are key, so participants use well-known and well-regarded open standards rather than proprietary connectivity technologies that are less transparent and require special contracts and closed architecture.
- Maintain open bidding processes, and avoid projects that would create bottleneck, centralized control over infrastructure or services. Often, dominant providers (whether state monopolies or private sector monopolies) seek monopoly control for purposes of extracting monopoly rents or to control information. Projects should affirmatively promote the ability of local communities to create local facilities or networks capable of competing with a dominant incumbent.
- All institutions involved in connectivity investment, whether public or private, need open governance processes and structures in order to enable access to information, build trust with stakeholders, and ensure accountability for funding decisions.
- Corruption should be considered an obstacle to achieving human rights and development.

Sources for the principle:

- *Maina Kiai, Report of the Special Rapporteur for on the rights to freedom of peaceful assembly and of association, 2013: "Space at the multilateral level, particularly in the finance-related multilaterals, is often occupied disproportionately by for-profit interests — i.e., large banks and corporations... civil society representatives should be given the same access, input, and power as the private for-profit sector."*
- *World Bank, Governance Brief: Anti-Corruption, 2016: "The World Bank Group considers corruption a major challenge to its institutional goals of ending extreme poverty by 2030 and boosting shared prosperity for the poorest 40 percent in developing countries. In addition, reducing corruption stands at the heart of the recently established Sustainable Development Goals and achieving the ambitious targets set for Financing for Development. It is a priority for the institution and many of its partners."*
- *OHCHR, Human Rights and anti-corruption: "Human rights are indivisible and interdependent, and the consequences of corrupt governance are multiple and touch on all human rights — civil, political, economic, social, and cultural, as well as the right to development."*

PRINCIPLE 8

Connectivity initiatives should remain open to civil society and community participation throughout the life of the project.

In practice, this means:

- Stakeholders investing in connectivity, especially aid agencies, governments, and multilateral development banks, should provide specific funding for assessments to be carried out by independent research experts.
- From planning and assessment to implementation and oversight, stakeholders must be consulted at every point, including those whose rights are directly impacted by the program. Those without resources to fully participate should receive support in the form of capacity-building and financing.

- *World Bank, World Development Report: Digital Dividends, 2016: "Ensuring safe and secure access will require greater international collaboration based on a multistakeholder model."*
- *NETmundial Multistakeholder Statement, 2014: "Capacity building and financing are key requirements to ensure that diverse stakeholders have an opportunity for more than nominal participation, but in fact gain the knowhow and the resources for effective participation. Capacity building is important to support the emergence of true multistakeholder communities, especially in those regions where the participation of some stakeholder groups needs to be further strengthened."*

PRINCIPLE 9

Connectivity initiatives must anticipate and offer ways to mitigate human rights harms through rights-respecting oversight and remedy processes.

In practice, this means:

- To facilitate access to remedy, and prevent problems before they escalate, project-level grievance mechanisms should be established, in coordination with affected communities and in line with human rights norms.
- Establish and publish points of contact to hear grievances and predictable, transparent procedures to appeal determinations. Participation in a remedial process should never preclude judicial remedy.
- Special care should be taken to facilitate access to remedy for harms that private sector actors cause or contribute to, or that arise from public-private partnerships.
- Regular feedback loops should inform oversight bodies, and proactively seek civil society and community responses.

Sources for the principle:

- *UN Guiding Principles on Business & Human Rights, 2011: "As part of their duty to protect against business-related human rights abuse, states must take appropriate steps to ensure, through judicial, administrative, legislative, or other appropriate means, that when such abuses occur within their territory and/or jurisdiction those affected have access to effective remedy; states should consider ways to facilitate access to effective non-state based grievance mechanisms dealing with business-related human rights harms."*
- *APC Internet Rights Charter, 2006: "People need free public access to effective and accountable mechanisms for addressing violations of rights. When human and internet rights are threatened by internet-based content, or by illegitimate surveillance, limitations on freedoms of expressions, and other rights, parties should have access to recourse mechanisms for taking action against such infringements."*

III. CONCLUSION

Access Now, Public Knowledge, and the International Federation of Library Associations and Institutions (IFLA) developed this document through consultations throughout 2016. We continue to widen our circles of consultation, as we intend to develop these Principles to a final draft, circulated for endorsement by all stakeholder groups before their launch at the Internet Governance Forum in December 2016. We invite all input, comment, and criticism of the Principles, as well as suggestions for initiating or joining partnerships and work-streams in order to implement them.

Access Now is an international organization that defends and extends the digital rights of users at risk around the world. By combining innovative policy, user engagement, and direct technical support, we fight for open and secure communications for all.

Public Knowledge promotes freedom of expression, an open internet, and access to affordable communications tools and creative works. We work to shape policy on behalf of the public interest.

IFLA is an independent, international, non-governmental, not-for-profit organization. Our aims are to promote high standards of provision and delivery of library and information services, encourage widespread understanding of the value of good library & information services, and represent the interests of our members throughout the world.

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