

**Before the
Federal Communications Commission
Washington, DC 20554**

In the Matter of:)
)
FCC Seeks Input On Positions For) IB Docket No. 10-68
Upcoming International)
Telecommunication Union Conferences)

**VERIZON¹ AND VERIZON WIRELESS' COMMENTS
ON PUBLIC NOTICE SEEKING INPUT FOR UPCOMING
INTERNATIONAL TELECOMMUNICATION UNION CONFERENCES**

The upcoming International Telecommunication Union (ITU) World Telecommunication Development Conference (WTDC), and the Plenipotentiary Conference (PP-10) come at a critical time as information and communication technologies (ICTs) take on an increasingly central role in economic and social development around the world. The United States can and should play a leading role in helping to develop forward-looking policies that will enable the rapid spread of ICTs in other nations and bring the benefits of broadband and the Internet to as many users as possible. Verizon supports the nine priorities laid out by the United States for the Development Sector of the ITU as a way to help advance this goal.

Since 1865, the ITU has been developing recommendations and standards that have helped the world's communication networks spread across the globe. The ITU plays a particularly important and successful role in helping the world's developing countries gain access to the most advanced technologies, develop expertise, and build the communications infrastructures that serve as the basis for modern economic growth. This exchange of information helps to harmonize networks, speed the development and deployment of advanced

¹ In addition to Verizon Wireless, the Verizon companies participating in this filing ("Verizon") are the regulated, wholly owned subsidiaries of Verizon Communications Inc.

services, and create opportunities for users and businesses alike. The WTDC and Plenipotentiary Conferences represent an opportunity for the ITU to continue this work.

These two conferences come at a particularly significant time in the development of communications systems around the world. Broadband and the Internet have become important resources for individuals, businesses and governments to carry out their daily activities. In a recent speech to the Inter-American Telecommunication Commission Assembly in Mexico, ITU Secretary General Toure described the benefits of broadband and the enabling effects it can have on economic development and growth.² Many countries around the world (including the United States in its recently released National Broadband Plan), have acknowledged the central importance of broadband and the Internet and are working hard to develop plans and policies that will speed the deployment of broadband networks and make affordable Internet services available to a wide range of users. At the same time, industry has recognized the transformative importance of broadband for individuals and organizations alike, particularly in the areas of education, healthcare, and energy.³ An important part of such efforts will be the further development of next-generation wireless broadband (so-called “4G”) networks, which are now being deployed in several developed countries. Indeed, Verizon is currently in the process of building out its own 4G network in the United States using the Long Term Evolution (LTE) technology standard that is expected to be deployed by the majority of operators around the world.

The ITU has an important part to play in the rollout of broadband and the Internet by promoting investment and development through its traditional role in facilitating information

² Dr. Hamadoun Toure, Secretary General, International Telecommunication Union “Toward A Better Future: Redefining The ICT Sector in the Americas” speech delivered at the CITEL High-Level Forum, Fifth Regular Meeting of the Assembly of CITEL, CITEL/doc. 443/10 (March 9, 2010).

³ *See generally*, Verizon and Verizon Wireless Comments on a National Broadband Plan, GN Docket No. 09-51, (filed June 8, 2009).

gathering and exchange. As a resource for countries seeking to improve their communications networks, the ITU plays a critical part by providing education, training, and technical assistance, and by facilitating information exchange and cooperation. However, the ITU's role in developing recommendations and standards should not be expanded to the development of policies to govern the Internet. The technical standards that allow the Internet to route and deliver traffic so efficiently have been developed by groups such as the Internet Engineering Task Force for many years. Both technical and policy decisions governing the Internet have likewise been effectively addressed through private-sector-led processes and cooperation and self-governance by players throughout the Internet ecosystem. This approach of maintaining a light regulatory touch and encouraging engineers and stakeholders to work together to address concerns as they arise has been uniquely successful in allowing the Internet to spread and evolve. At this point in time, the ITU should not duplicate work that is already being successfully undertaken by other groups, nor should the ITU become involved in the operational side of the Internet's day-to-day workings. Rather, the ITU should continue its tradition of information gathering and exchange, and continue to serve as a resource for countries seeking to improve their communications networks and build their related expertise.

World Telecommunication Development Conference. The bottom-up, member-driven character of the ITU is an essential element in the successful Member State-Sector Member partnership of this unique multilateral institution. The ITU's Development Sector is an effective forum for the exchange of information and ideas, as Verizon has found during its ten years as an active Sector Member. This cooperative approach will continue to be vital as the ITU addresses the challenges of the broadband/Internet world.

Verizon strongly supports the nine priorities laid out by the United States for the work of the Development Sector over the next four years.⁴ The first priority, “increasing access to broadband infrastructure, service and applications”⁵ is critical, as the realization of many of the other eight goals will flow from increased availability and adoption. As a fundamental enabling technology, broadband will be a progressively more important part of efforts to address the many challenges that the world faces, including accessibility, health care, secure emergency communications, energy efficiency, education and work force development, and economic recovery and competitiveness. To meet these challenges, broadband must be widely available and utilized, and it must provide users with a wide and expanding range of choices in terms of speeds, levels of security and reliability, mobility, and other capabilities to meet their many and varied demands. Addressing business, government, and consumer needs will be especially important as the United States and the ITU seek ways to bring the economic and social benefits of broadband and the Internet to developing countries around the world and to allow those countries more direct and vigorous participation in the global economy.

The fourth priority established by the United States for the work of the ITU’s development sector, “creating an enabling policy environment for information and communications technologies (ICTs) that encourages innovation, investment, and economic growth,”⁶ will be critical in realizing the goal of greater broadband availability and use. In the world’s developed countries, innovation and investment has helped to make broadband an integral part of the lives of millions, providing an ever-expanding array of services, applications, and devices. Network providers – with millions of jobs and billions in annual investments in

⁴ *International Telecommunications Union Conference*, Public Notice, IB Docket No. 10-68, DA 10-423 (Rel. March 16, 2010) (“United States Proposal to WTDC”).

⁵ *Id.* at 1.

⁶ *Id.*

networks and innovation – have been a vital part of that dynamic. Going forward, the private sector will continue to play a central role in broadband infrastructure build-out. It will be important for the U.S. government to work with its partners in the ITU to create an enabling environment that will encourage innovation, investment and economic growth. Conversely, the United States should oppose programs that effectively require companies to register their equipment with the ITU or that prescribe how certain services or functions are offered. Such programs would limit the flexibility of service providers and would bring the ITU into direct competition with effectively functioning private sector entities.

Concurrent with enabling innovative ICTs and increasing access to broadband is the United States’ second named priority of “promoting network security,”⁷ and in particular the proposed follow-on work on cybersecurity that will be considered by ITU-D Question 22/1. The United States should share lessons learned and best practices with developing countries looking for help and guidance in this critical area. Especially as increasingly more personal and commercial business is conducted online, developing robust and effective cybersecurity policies will help to ensure confidence in networks and services. The work of ITU-D Question 22/1 will allow for continued discussions of important security issues.

In addition to the broadband related priorities the United States has put forth to the ITU, the United States has also identified priorities that address the needs of particular end user groups. These priorities bolster efforts to bring the needs of users directly into the work program of the ITU-D, and will enhance access for all users to the benefits that broadband and the Internet offer. For example, the United States has expressed a priority that encourages the expansion of broadband networks and Internet services to users with special needs, including younger users

⁷ *Id.*

and those with disabilities.⁸ This priority is bolstered by industry efforts to work with software developers, policymakers, universities, and consumer and disability groups to share best practices and better understand the needs of consumers with disabilities and foster innovation.⁹ Additionally, the United States has expressed a goal of promoting e-government as a means to attain more efficient and effective government.¹⁰ Collaborations between industry, developers, and administrations can help develop policies that promote e-government programs to reach out to citizens and users of all types of government services. Such programs can be effective drivers of broadband adoption as users realize the ease, convenience and efficiency of accessing government services online, especially in remote areas where government offices or services may not be available at all.

Finally, the United States has offered a priority to the ITU seeking to bridge the standardization and interoperability gap.¹¹ Some developing countries may face difficulties building out the next generation of communications networks and broadband infrastructure. By classifying the difficulties developing countries face and identifying possible solutions, including human and institutional capacity building in type approval, conformity assessment and other related matters, the ITU can assist in the assessment and analysis of these issues. However, ITU initiatives should not undermine the current certification and interoperability testing regimes. Requiring vendors to submit their equipment to another layer of conformance and/or interoperability testing, perhaps in multiple different countries, would only serve to raise costs and slow product availability, without providing any real benefits to end users.

⁸ United States Proposal to WTDC, Priority 8 at 1.

⁹ Letter from Kathryn Brown, Senior Vice President, Verizon, to Marlene H. Dortch, Secretary, Federal Communications Commission, GN Docket Nos. 09-47, 09-51, 09-137, (filed November 16, 2009).

¹⁰ United States Proposal to WTDC, Priority 7 at 1.

¹¹ United States Proposal to WTDC, Priority 9 at 1.

Plenipotentiary Conference. Many of the views expressed above are equally applicable to the upcoming Plenipotentiary Conference in Guadalajara, Mexico, where the ITU leadership will be elected and key ITU goals and policies determined. The Commission's Public Notice specifically asks for comment on issues that other countries may raise at the Plenipotentiary Conference, including Internet governance issues.

Certainly, the ITU is facing many challenges as the world transitions from the old circuit-switched network and economics to a new world based on IP-enabled next generation networks. But as the United States seeks to help the ITU make this transition, it should resist efforts by the ITU and some Member States to expand the ITU's influence to areas where the ITU has neither history nor expertise. The core competencies of the ITU have well stood the test of time and are flexible enough to accommodate evolving technologies and the forward-looking work of the organization. The ITU should not, however, expand its role into the Internet space, including Internet governance, naming, numbering and addressing; nor should the ITU become an Internet registry for IPv6. There are already organizations that perform these functions well and there is no need to duplicate efforts. The ITU can play an important role in providing education, training and technical assistance to developing countries. It can bring together groups to promote cooperation, exchange information, and possibly develop best practices in key areas such as cybersecurity. It should not become an operational partner in the governance of the Internet.

One of the main purposes of the ITU continues to include promotion of technical facilities to enhance the efficiency and usefulness of telecommunications services. Successful infrastructure development depends on governments and the private sector working closely together. Existing ITU programs and policies, such as the ITU's Centres of Excellence, have

boosted these efforts. We look forward to continuing to work as a Sector Member with our partners in Geneva and around the world to ensure successful future outcomes.

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April 12, 2010