

to new communications technologies and services for persons with disabilities; and (9) bridging the standardization gap.”²

AT&T supports the substantive priorities outlined in the U.S. contribution to the WTDC and notes in particular the aspects of these issues highlighted below. AT&T also notes the emphasis placed by the U.S. contribution on the vital role that the private sector will play in achieving these important goals and looks forward to working on these matters together with government and other stakeholders engaged in the important work of the ITU-D.³

Broadband: AT&T agrees that encouraging the expansion of access to broadband infrastructure, services and applications in all countries should be a major priority for the ITU-D. Such action would further the Purpose of the ITU stated in Article 1(d) of the ITU Constitution “to promote the extension of the benefits of the new telecommunications technologies to all the world’s inhabitants,” and would assist the adoption of services and technologies that have the potential to deliver new opportunities throughout the globe. ICT has already become a critical driver of economic growth in both developed and developing countries. The deployment of broadband technologies promises to multiply these benefits by leading to the creation of innovative services that are key economic drivers in themselves and also enhance the benefits of investments in other industries and institutions – such as by enabling transportation systems to run more smoothly, delivering new efficiencies to electric grids, expanding access to health care, providing new work options that allow reduced travel and emissions, connecting students to

² *Id.*

³ Final Contribution of the United States of America, ITU, World Telecommunications Development Conference, Hyderabad, India, May 24- June 4, 2010 (“U.S. Contribution”), at 2 (“[W]e believe that ITU-D must maintain and promote the central role of the private sector. In fact, going forward, we believe that close collaboration between the public and private sectors as well as other stakeholders will be required as never before.”).

expanded educational resources, and bringing increased effectiveness to government.

The United States properly emphasizes in its contribution to the WTDC that governments “should catalyze rather than supplant” the private sector investment necessary to expand broadband infrastructure and services.⁴ As the World Bank has found, “[c]ompetitive, well regulated private investment remains the key to meeting the growing demand for [information and communications infrastructure].”⁵ Additionally, “[t]here is plentiful evidence that countries that have introduced private competition under capable regulators have seen faster rollout of services and lower costs. Independent regulation and competition together raise private investment by 50 percent. In turn, private investment is related to higher teledensities and greater efficiency in the sector.”⁶

Security: The United States also properly emphasizes the importance of cybersecurity to today’s broadband networks and services.⁷ AT&T leads the industry in developing and implementing network-based security solutions and enthusiastically supports the proposed follow-on work in this area through ITU-D Question 22/1 (“Securing Information and Communication Networks: Best Practices for Developing a Culture of Cybersecurity”), which will be considered by the WTDC. As broadband networks play an increasingly instrumental role in virtually all facets of cultural, economic, social and government institutions, a safe and secure online environment is an imperative. Without effective network security, all broadband enabled services, including e-commerce, telemedicine, smart grids, telecommuting, inventory tracking,

⁴ *Id.* at 3.

⁵ *Financing Information and Communication Infrastructure in the Developing World*, World Bank Working Paper No. 65 (2005), at xiii.

⁶ *Id.*

⁷ U.S. Contribution at 3.

voice and video conferencing and others would be vulnerable to serious disruption from cybersecurity threats that are growing rapidly in both number and sophistication. AT&T accordingly supports actions specifically in the ITU-D to build capacity towards a global culture of cybersecurity, including encouraging international cooperation, closer coordination between governments and network service providers, the sharing of best practices to protect against spam, malware and other cyberthreats, and the collection of methods to increase and improve outreach to consumers, to ensure that all relevant stakeholders address these growing threats. Certainly, there are other organizations and stakeholders that have important roles in enhancing cybersecurity, and the ITU-D will be among these with its well-regarded role in facilitating the needs of developing countries.

Gender: AT&T believes that closing the gender gap on use of communications technology will bring substantial benefits to women, their families and society at large. It will take coordinated action by all major stakeholders including the industry, governments, development organizations and policy makers. The focus should be on issues of access to the technology and affordability as well as other barriers such literacy.

Persons with Disabilities: AT&T also supports the U.S. emphasis on the importance of the ITU-D expanding its commitment to promoting new technologies and communications services to facilitate access by persons with disabilities to ICTs. Access to new and innovative communications technologies is even more important for people with disabilities because, as the Commission has recognized, “[a]dvanced services can bring this population significant educational, employment and recreational opportunities.”⁸ For example, real-time, broadband

⁸ *Inquiry Concerning the Deployment of Advanced Telecommunications Capability to All Americans in a Reasonable and Timely Fashion*, Second Report, 15 FCC Rcd. 20913, 21000, ¶ 234 (2000).

based communications that can support video conferencing, IP captioning, or video or text-based IP relay services can assist individuals with hearing and speech disabilities, while Internet access opens up a world of self-help, medical support, and social networking for those who might otherwise be isolated.

Emergency Communications: AT&T agrees that the modernization of public safety communications structures should be an important priority in all countries and supports the increased focus by ITU-D on the increased use of telecommunications and ICTs for disaster prediction, preparedness, response and recovery. As the United States recommends, the ITU-D should encourage developing countries to include emergency communications as part of development projects and to provide the maximum flexibility for the use of different technologies for those communications.⁹

Policy Environment: Another major priority of the ITU-D should be to emphasize the benefits of open and competitive telecommunications markets in encouraging the provision of high quality, low cost telecommunications and ICTs and broad economic growth in countries at all levels of development. Consistent and compelling evidence demonstrates that telecom liberalization stimulates network expansion, more affordable services and the creation of new entrepreneurial and development opportunities. The World Bank reports that “[l]iberalization and competition – and the resulting increase in private investment – have driven the development of telecommunications infrastructure and ICT in general. . . . By opening their communications markets through well-designed reforms, governments can create competitive markets that grow faster, lower costs, facilitate innovation and respond better to user needs.”¹⁰

⁹ *Id.* at 4.

¹⁰ World Bank, *Information and Communications for Development 2006: Global Trends and Policies*, at

Many countries nonetheless retain telecom market entry barriers that limit competition, investment and growth in this critical industry. Therefore, the ITU should encourage all countries to open their telecom markets to benefit from the liberalization and competition that is driving the development of communications infrastructure and ICTs throughout the world. In particular, the ITU should urge the removal of restrictions on foreign investment in telecom networks and services, which deter investment, raise the cost of capital and cause other significant inefficiencies harming network expansion and stunting ICT growth. The experience of the more than twelve years since the adoption of the WTO Basic Telecommunications Agreement has amply demonstrated that open markets and competition are far more effective than the use of subsidies – explicit or implicit – in promoting innovation, investment and growth.

Standardization Gap: AT&T fully recognizes the legitimate concerns expressed by many developing countries regarding the need to close the “standardization gap” and in particular, the need to improve network interoperability, interconnection, and the quality of equipment and services in their respective markets. To this end, AT&T supports the U.S.-proposed new study question on conformity, interoperability and type testing that will also be considered by the WTDC. Global standards have a positive effect on the mission of the ITU-D, because such standards promote vast economies of scale and predictability in the production of equipment, which in turn lowers the cost to supply equipment.

Internet Governance: In regard to potential issues for discussion at the Plenipotentiary

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6. *See also, id.* at 70 (Liberalization and competition “will stimulate new investment in additional bandwidth, increase demand for communication services through falling prices, and promote greater efficiency and innovation in the provision of infrastructure and services.”).

Conference, the International Bureau noted the possibility for proposals from other country delegations seeking to expand the ITU mission from its current scope, to include Internet governance issues, including fundamental aspects of managing the Domain Name System (naming, numbering, addressing) and coordinating cybersecurity policies and standards.

AT&T believes that the ITU provides an important inter-governmental venue for the discussion of topics regarding implementation of the outcomes of the World Summit on the Information Society (“WSIS”). With regard to the implementation of WSIS Action Line C5, “Building Confidence and Security in the use of ICTs,” for example, AT&T supports the ITU-D work effort under Question 22/1 which focuses on sharing best practices and technical information and human capacity building.

However, beyond the important ITU-D work, AT&T recommends some careful consideration of other ITU Internet governance policy and technical coordination matters. In recognition of the critical ongoing contribution of the private sector – both businesses and civil society – in the development of the Internet ecosystem, there are other multi-stakeholder organizations and fora where the core Internet governance issues are effectively addressed. AT&T recommends that Internet governance issues should continue to be addressed through existing mechanisms that support broad, multi-stakeholder dialogue involving businesses, government, civil society and the Internet technical community, such as the Internet Governance Forum, the Internet Society, the Internet Engineering Task Force, the Internet Corporation for Assigned Names and Numbers (“ICANN”), and Regional Internet Registries (“RIRs”). The ITU does and will continue to play an important role in IP technical standards work, development and education, training and technical assistance to developing countries working closely with these and other such groups. This implementation and development role, particularly of ITU-D as will

be discussed at the WTDC, is complementary to the Internet governance responsibilities of other organizations. As the ITU refines the agenda for the Plenipotentiary Conference, AT&T recommends that the ITU remain a valued contributor, but that it avoid expanding its core mission to overlap with policy development and technical coordination activities that are being undertaken effectively by other organizations.

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AT&T is pleased to provide these comments and looks forward to providing additional input to the Commission, the State Department, the National Telecommunications and Information Administration and other expert agencies participating in the development of the U.S. positions as the preparatory work for these important conferences continues.

Respectfully submitted,

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