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Mr. Petko Kantchev
Chair of the Informal Experts Group
World Telecommunication Policy Forum 2013
International Telecommunication Union
Place des Nations
1211 Geneva 20

Ref: Third Draft of the Secretary General's Report for the Fifth World Telecommunication/Information and Communication Technologies Forum 2013

Dear Mr. Kantchev,

Thank you for the opportunity to comment on the "Third Draft of the Secretary-General's Report for the Fifth World Telecommunication/Information and Communication Technologies Policy Forum 2013."

Given the tremendous growth in Internet traffic forecast over the next 5 years as illustrated by Cisco's Visual Networking Index (http://www.cisco.com/en/US/netsol/ns827/networking_solutions_sub_solution/html), the WTPF should consider means to enable a framework for investment and development.

In the attached Annex please find comments on the third draft of the Secretary General's report to the WTPF'13. Thank you for your consideration of these comments.

Sincerely,

Hascall Sharp

Director, Technology Policy & Internet Governance

Annex 1

Section 2.3.3 (d):

When discussing the cost of Internet interconnectivity (international or domestic) two components must be taken into account:

The physical connectivity to the interconnection point (e.g., leased bandwidth).

The agreement between the two providers to carry traffic on their respective networks.

The physical connectivity might need to be leased from a third provider to reach the interconnection point. The interconnection point might be in the same country or in a different country. The distance might be measured in meters or in hundreds of kilometers. The ability to lease the required bandwidth or to provide the bandwidth can be affected by regulations (e.g., restrictions on provision or leasing of bandwidth between countries or restriction on carrying of traffic across borders).

Cisco's original comment tried to take these aspects into account. The text included in the 3rd draft does not capture Cisco's intent and seems to say that transit providers constrain the ability for ISPs to conclude commercial agreement. The intent of our comment was that an enabling environment should be established to allow Service Providers competitive access to cross-border bandwidth as well as in-country bandwidth. Obstacles to commercial arrangements for transit and peering should be removed to allow for growth.

The second sentence should be rephrased, e.g.,

> "An enabling and competitive environment must be in place to allow for availability of affordable bandwidth for cross-border and in-country interconnection as well as to allow for Internet Service Providers to make commercial arrangements for peering or transit."

Section 2.3.3 (f)

The source is attributed to a Cisco-Nav6 joint contribution. This has caused some confusion with some people looking for the source document. Cisco and Nav6 made separate contributions to the 1st Draft. The text currently in the 3rd Draft was the result of an ad hoc discussion during a break of the first Informal Experts Group (IEG) as requested by the Chair. This should be indicated instead of referring to it as a "Joint Contribution".

In addition, the situation is more complex than indicated in the current draft. The current text could lead people to believe that adding end-to-end Quality of Service (QOS) to the Internet or to interconnected IP networks is a matter of simply turning on a feature in the networking equipment. The issue of increased cost and complexity is not addressed. This can be discussed at the IEG meeting. Potential text could be:

> An IP-based network~~s~~ can support end-to-end QoS if ~~the~~ its routers ~~in between~~ support the appropriate mechanisms and the network is designed for QoS. Adding Quality of Service to a network can increase the complexity and the cost of the network depending on the mechanisms used and the service quality levels provided.

Section 2.3.3 (h):

The attribution to Cisco here is incorrect. Cisco's comments referenced 2.3.3 (f) not (h). Cisco did not contribute a response to UK's comments. Please remove the text attributed to Cisco or correct the attribution.

Section 2.3.3.2 (d):

The same comment made on Section 2.3.3(f) applies here concerning the attribution. Cisco and NAV6 made separate contributions to the first meeting of the IEG. The final text was the result of an ad hoc discussion during a break of the first IEG meeting.

Section 2.3.3.2 (e):

The text in the 3rd draft says "therefore the previous allocation policies of the RIRs are feasible for IPv6."

The word "previous" should be replaced by "current" since the text should be talking about the current policies for IPv6 address allocation, not previous allocation policies. The text would then read, "therefore the current allocation policies of the RIRs are feasible for IPv6."