

RWANDA

COMMENTS ON THE REPORT OF THE WGIG

1 Preamble

As part of the national preparation for the World Summit on the Information Society (WSIS) phase II in Tunis this coming November, Rwanda has brought together representatives from government, academia, the private sector and civil society to contribute to the national commentary on the report of the WGIG.

We strongly welcome the emphasis which the report has put on facilitating meaningful participation on Internet Governance by developing countries. In Rwanda we wish to play a more active role in such issues in future, but will need support to enable us to do this.

We find that most of our comments and issues highlighted in this submission center around assumptions which have been made which do not hold universally, certainly not for Rwanda and many countries like Rwanda. We think that some observations and recommendations may not be meaningful until the assumptions behind them, and the issues which they present for certain countries, are addressed. Many of these issues related either directly or indirectly to effective meaningful and participation in Internet Governance.

On a general note, as an African country and a member of the LDCs, our major concerns in Internet Governance at the present time, center around interconnectivity costs (including transit traffic costs), local content development, multilingualism and culture diversity.

2 General Comments

- 2.1 There is an issue on whether academia and research institutes are included by the term civil society? It was felt that the term civil society did not include research institutes and academia and we think that there should be some reference to the same in the definition of Internet Governance and in the paper as a whole.
- 2.2 There is no definition of the Internet in the report. Is there perhaps a need to explicitly state the understanding of the working group by use of the term Internet, in order for clarity and to avoid ambiguity?
- 2.3 The issue of access to internet (universal access), while not in and of itself an internet governance issue, is relevant to the working group brief in that there needs to be a critical mass of users for internet governance to have meaning, or at least to affect society as a whole. Whereas clearly there is a critical mass globally of Internet users, in some countries and regions there is not yet the critical mass, which is needed to stimulate public debate in Internet governance issues. This is also linked to lack of capacity to comment on Internet Governance issue, which in turn can mean that policies to resolve lack of access in developing countries may be overlooked. It is within this context that we find it important to mention universal access in the report.
- 2.4 Ownership and participation in Internet governance: In places such as Rwanda we are still relying on decisions made abroad. Developing countries need to be active in Internet governance however it should be clear that participation in the development of the Internet, is somewhat a prerequisite to full participation in internet governance. This is not explicitly mentioned in the document.

3 Comments on Section III : Public policy issues

- 3.1 *Paragraph 18:* Is spam notably different from other cybercrimes? There are any number of cybercrimes (attacks to confidentiality, privacy, integrity, denial of service, viruses, Trojans, worms...We feel the generic term of cybercrime includes also spam and consequently wonder why it is singled for attention out here. If there are pressing reasons to the separate examination of spam, they should be explicitly mentioned.
- 3.2 *Paragraph 19:* (Third bullet point) We feel it is acceptable that the producer of content decides to make it public or not. However, if reference is being made to the same international organizations that participate in global internet policy development, then the phrasing should change, eg. replace "some" by the explicit names of the organizations or state that information

produced in the process of global internet policy development should be put in the public domain and be easily accessible.

(Fourth bullet point) What is meant by “remote areas”? Everywhere is in a sense remote, depending on the context – Bujumubura may be remote from Washington but is quite convenient to Kigali. No location for a meeting will be universally easily accessible and more accessible locations may not be geographically obvious. For example, some European locations are more accessible to Kigali than are West African locations. In any case, the issue here is more capacity, both in terms of finance and technical knowledge for some stakeholders to attend meetings, than the location and frequency of meetings themselves.

As a side note, the use of the term “remote areas” is used elsewhere in the IG report and the background report to mean areas which are remote from the Internet backbone. This is clear and well defined, but seems to have been wrongly applied in this paragraph.

- 3.3 *Paragraph 30: Cultural diversity etc.* We feel that role should be played by the civil society, of course with the support of government.

4 Comments relating to specific recommendations for action (Section V, part B of report)

- 4.1 *Paragraph 78 (Interconnection Costs):* In the recommendation for interconnection costs there is suggestion to encourage donors to help with advanced connectivity projects and other similar projects. There is however, some work to be done before this to convince donors to look at funding IT infrastructure. In Rwanda’s experience there is only a very small number of donors who approach IT projects with an infrastructure paradigm, most look at IT as being “cross-cutting” i.e. IT in education, IT in health etc. This has the result that a coherent information infrastructure is often overlooked by donors and that any infrastructure projects are often private sector driven. The consequences for countries like Rwanda who are dependant on aid, is that funds for national and regional information infrastructure are hard to obtain, in fact their importance is not well understood by many donor entities. The point to note is that there may be some work to be done in changing donor’s ways of viewing IT before they can be encouraged to fund connectivity. The few donors who are active in information infrastructure could be encouraged to convince other donors to change their approach.

- 4.2 *Paragraph 79 (Internet stability, security and cybercrime):* The suggestions for cybercrime center around increased cooperation however many countries like Rwanda have yet to develop national laws on cybercrime.

The need for national laws on data protection is mentioned in the report – why not for cybercrime?

4.3 *Paragraph 82 (Meaningful Participation)*: Suggest a small addition to the second bullet point. Text would read “Specific efforts should be made to address the lack of funds and human capacity of the different stakeholders of developing countries”. (text in underline added). This is to reinforce the idea already stated in the document that human capacity is a significant constraint on meaningful participation.

4.4 *Paragraph 83 (Data Protection and privacy rights)*: The concept of privacy in the real world differs according to culture. An example of this would be the public outcry in the UK at the proposed national ID cards, when for citizens of many countries including Rwanda, this is quite natural. Our concern is that concepts of privacy in the digital domain may also have variances according to culture. It will be useful to have an agreed concept of the term “misuse of personal data” in order to avoid imposing concepts of privacy, particularly in countries with no legal tradition in such fields.

4.5 *Paragraph 84 (Consumer Rights)*: Comments here relate to online consumer rights. What is the effect of this recommendation in countries where there is no tradition, legal or otherwise, of consumer rights ‘offline’? Tied with this is the idea of consumer empowerment, having rights is of limited benefit if customers are not empowered to demand them. We found no reference to consumer empowerment in the report.

4.6 *Paragraph 85 (Multilingualism)*:

(a) The phrase “multilingual domain names” is unclear and not defined, an example would be instructive.

(b) This section relates to multilingual content. It is felt that the phrase “more efforts should be put into developing content development tools to facilitate the creation of multilingual content” needs to be clearly defined and elaborated in more detail. What specially is being recommended here? And, in any case how does this recommendation tie in with market forces? Surely if there were sufficient demand then such tools would already exist? If there is not enough demand to make such tools viable, what efforts should be made and by whom?

We further feel that promoting content, while being important for access to the Internet and as tool for introducing cultural diversity, is not enough. Some care and attention needs to be given to quality of content produced, particularly in regional and local languages. Efforts must be made to ensure that such content is relevant, diverse and regularly updated.

5 Comments on proposed models for Internet Governance

We feel that the best model for Internet Governance in the future is one which is as inclusive as possible in terms of representation, participation and benefits for all Internet users, irrespective of location. The model should take particular care to empower all stakeholders while making allowances for the challenges faced by certain user groups in participation in global policy dialogue.

Model 4, paragraph 69, text says “as observers” should be “as full members”. Rwanda is deliberating on the proposed models and will express her views on the same in Rwanda’s WSIS position paper.