



United States Department of State
2201 C Street NW, Rm 4634
Washington, D.C. 20520

January 15, 2020

Mr. Houlin Zhao
Secretary-General
International Telecommunication Union
CH 1211 Geneva 20
Switzerland

Dear Mr. Zhao:

RE: U.S. Contribution to ITU Circular CL-19/47

In response to Circular CL-19/47 regarding the development of guidelines for the utilization of the Global Cybersecurity Agenda (GCA) by the ITU, the United States recalls the process undertaken to develop the GCA through the High Level Experts Group (HLEG) and the Chairman's report that continues to provide a valuable reference for the ITU membership and their work on cybersecurity issues. This submission outlines three core principles for the process of developing the subject guidelines and provides some specific recommendations to consider.

- (1) During the negotiations on Resolution 130 in Dubai, PP-18 determined that there is no need for updating or revising the GCA. The subject circular rightly reflects that decision by noting that, "...this effort is not meant to and will not address matters related to the revision of the GCA." Any guidelines that are promulgated for the ITU's utilization of the GCA should also adhere to that decision and, pursuant to the 2019 session of Council, should not stray into guidelines for Member States in their activities that may fall under the ITU's work through the GCA. Rather, the guidelines should focus on how the ITU can better utilize the GCA in its relevant work in the three sectors of the ITU as appropriate.
- (2) The United States notes that any appropriate guidelines developed for utilization of the GCA by the ITU would be better informed by the Secretary-General's report on how the ITU is currently utilizing the GCA framework as instructed by the 2019 session of Council, which will also be presented to Council in 2020. As such, we believe this report is an iterative step in the process for developing the guidelines and additional consideration by the ITU membership will be required.
- (3) Council specifically called for the involvement of Member States in developing appropriate guidelines. The ITU could consider how best to accommodate that involvement not only at this entry point, but throughout the process and in an

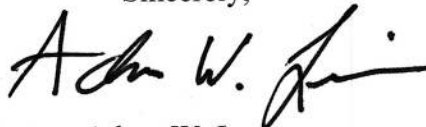
informed and transparent manner. The Open Consultation during the WSIS Forum 2020 is an excellent opportunity to discuss the draft of the guidelines; however it does not include the benefit of the ITU's report on how it is currently utilizing the GCA so before guidelines are finalized, there should be a more useful opportunity for incorporating that report into the process.

Consistent with these overarching principles, the United States offers the following recommendations for the development of appropriate guidelines for utilization of the GCA by the ITU:

- *Multifaceted issues with global resources:* there are a number of organizations, partnerships, and venues that undertake efforts on the variety of cybersecurity issues that the GCA addresses. The ITU should engage with them, as appropriate to its mandate and with appropriate Council oversight, and refer Member States to other relevant organizations and initiatives.
- *Synergy not duplication:* The ITU should leverage synergies with other organizations with core competencies engaged in activities that would fall under the GCA framework and refrain from duplicating similar efforts.
- *Informed participation:* In addition to the WSIS Forum outreach opportunity, the ITU should consider the report on its current utilization of the GCA as mandated by Council as information for Member States to consider in providing input on the guidelines for ITU's utilization of the GCA.
- *Member State involvement and oversight:* The ITU Secretariat should ensure that its work in these areas are member-driven and undertaken with appropriate oversight.
- *Clear goals and objectives:* The ITU Secretariat should ensure that its work in activities under the GCA is guided by a clear assessment of the needs and objectives, including a clear articulation of the deliverables to meet them. This effort would be well-guided by appropriate metrics and measurements that reflect the value for Member States.

Thank you again for the opportunity to comment. We look forward to the input and engagement of others in this process.

Sincerely,

A handwritten signature in black ink, appearing to read 'Adam W. Lusin', with a stylized flourish at the end.

Adam W. Lusin
Director, Multilateral Affairs
International Communications & Information Policy
U.S. Department of State