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Dear Sir / Madam

Global Symposium for Regulators (“GSR”) Consultation on “Regulatory Uplift for Financing Digital Infrastructure, Access and Use.

As a proud ITU-D Sector Member and one of the world’s leading independent owner and operator of wireless communications infrastructure, American Tower Corporation (“ATC”) is committed to connecting the unconnected and supporting global efforts to maintain and increase the resilience of telecommunication networks.

The Covid-19 pandemic has highlighted the need for smart public-private partnerships that focus on the needs of future generations and empowering local communities. As such, enhanced multistakeholder dialogue and cooperation is required to accelerate economic recovery and bridge the financing gap (USD 428 billion) to achieve universal connectivity by 2030.¹

ATC believes that the points set out in the annex to this letter provide a regulatory uplift for financing digital infrastructure, access and use.

We thank Ms. Mercy Wanjau, Acting Director General, Communications Authority of Kenya and GSR-21 Chair, for her consideration of our submission as she develops the GSR Best Practice Guidelines.

Yours faithfully

Ravi Suchak
Vice President, Public Affairs – EMEA
American Tower Corporation

¹ ITU (2020). [“Connecting Humanity – Assessing Investment Needs of Connecting Humanity to the Internet by 2030.”](#)



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ANNEX – ATC RECOMMENDATIONS IN RESPONSE TO THE GSR CONSULTATION

Digital infrastructure and services have become the foundation of the digital economy and society, and a powerful driver for development. By promoting the sharing of passive infrastructure and, policymakers can trigger a multiplier effect on investment in digital infrastructure and services. For example, a study conducted by EY estimates that, in Europe, greater outsourcing to independent tower companies (“TowerCos”) could release an estimated EUR 28 billion of capital, which mobile network operators (“MNOs”) can re-invest in service delivery.²

Passive infrastructure sharing also enables significant cost savings and efficiencies. A typical location of a wireless network operator managed by a TowerCo is 40% more efficient than one managed by an MNO, resulting in economic savings of EUR 31 billion across Europe between 2019 and 2029.³

In addition, passive infrastructure sharing reduces the overall number of sites needed to meet service demand, leading to more efficient land use and a decrease in the overall aesthetic impact and carbon footprint of mobile networks. This particularly applies in developing countries where towers are often powered by diesel generators. Moreover, it is also worth noting the substantial investment TowerCos are making in green energy; ATC alone has invested more than USD 150 million in green energy solutions such as lithium-ion batteries and solar installations.

Affordability and Use

Regulation can contribute to improving affordability by providing financial incentives to encourage broadband infrastructure deployment. According to a World Wide Web Foundation, A4AI and UN Women Report 2018, only 23 out of 37 universal service and access funds (“USFs”) in Africa were active at the time of the study and an estimated USD 408 million remained unspent.⁴ Turning this situation around demands a serious rethink of USFs, not just in terms of their mission and governance frameworks, but also reinforcing their institutional capabilities, shielding them from political interference and increasing their transparency.

In parallel, regulation should also provide support for innovation in the design and deployment of low-cost rural networks. Additional efforts are also required to stimulate public spending on basic infrastructure, such as energy and transport, which represent a substantial cost in the provision of broadband. Finally, enhancing collaboration on improving digital literacy and empowering more women and girls to participate in the digital economy is key.

Finally, setting policies that guarantee an effective use of spectrum through moderate pricing and prioritizing the expansion of networks over maximizing revenues for the government can have a significantly favorable impact on the expansion of the digital economy, infrastructure investment and bringing benefits to remote or more disadvantaged areas. This is particularly relevant in the context of emerging technologies like 5G that require much more spectrum allocation.

² EY (2020). [“The Economic Contribution of the European Tower Sector.”](#)

³ Ibid.

⁴ WWWF, A4AI, UN Women (2018). [“Universal Service and Access Funds: An Untapped Resource to Close the Gender Digital Divide.”](#)



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Enhancing Multistakeholder Collaboration

To bridge the financing gap, policymakers and regulators should act as convenors of multistakeholder dialogue. This should include representatives of the public and private sectors, international donors and organizations, and civil society. In addition, by promoting sustainable and green investments policymakers have an opportunity to accelerate progress on achieving the 2030 Agenda.

Policymakers are further encouraged to develop regulatory frameworks that attract and foster investment in the telecoms sector. These should include financial (e.g., subsidies and/or tax exemptions for infrastructure deployment in rural and remote areas) and non-financial (e.g., eased restrictions on the import of network equipment and increased certainty on right-of-way rules) incentives. The use of USF as a financing tool for digital infrastructure will also contribute to bridging the financing gap.

Prototyping regulatory patterns for the post-Covid digital world

By jointly establishing repeatable regulatory processes that provide optimum yield for both government and industry, especially those that facilitate permitting and time-to-market, regulators can create frameworks to capitalize on emerging technologies and encourage foreign direct investment; it should be noted that investors look more favourably at markets with an enabling regulatory framework.

In addition, regulators should be careful not to automatically extend legacy telecommunications regulations to new and emerging technologies. Generally, innovation should be encouraged by adopting an ex-post approach to regulation and competition with regulatory sandboxes offering a safe space for regulatory experimentation and the fine-tuning of new business models.

Transformational leadership to unleash the power of emerging technologies and business models

The Covid-19 pandemic has highlighted that burdensome regulation, red tape and excessive protectionism is a deterrent to sustainable, equitable and resilient responses. As such, policymakers should commit to the adoption of agile and streamlined regulatory frameworks that enable the development and deployment of emerging technologies and business models. This approach (co-regulation/self-regulation) allows technology developers and providers to respond rapidly during a crisis without the need for emergency legislative changes and, in normal times, enables faster and more efficient network rollout at a lower cost for consumers and businesses.

Regulatory agility is a key characteristic of fifth-generation collaborative regulation (G5). It can be achieved through wide consultation with interested stakeholders from across the public and private sectors, as well as civil society. As regulators embark on the journey of developing state-of-the-art regulation, they should: i) provide a clear rationale for how and why decisions are made; ii) underline their goals; iii) establish time-bound targets and monitoring mechanisms for effective implementation; and iv) commit to sharing responsibility for the development, monitoring and implementation of rules and guidelines with other stakeholders. This will ensure sustainable policy making and contribute to facilitating collaboration and coordination on the development of the digital economy.