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**GSMA input on the First Public Consultation on ITU Strategy 2020-2023**

The GSMA welcomes the chance to respond the First Public Consultation on ITU Strategy 2020-2023. The GSMA is a Sector Member of all three sectors, Standardisation, Development and Radiocommunication, and is active in Study Groups, conferences and other meetings at the ITU such as Task Groups and Working Parties. We welcome the opportunity provided by these memberships to engage on behalf of mobile operators in intergovernmental discussions about issues that directly affect our industry.

Having said that, we note our role in representing the mobile operators at the ITU becomes ever more important in cases where our operator members find the costs of Sector Membership prohibitively high for the benefits given. This has led to some operators terminating their membership, which means the ITU is not fully benefitting from their important role in the international mobile broadband ecosystem and their valuable evidence-based input into ITU discussions.

We believe there are a number of areas in which improvements could create a stronger ITU by making Sector Membership more attractive and increasing industry participation:

**1. Enhance transparency:** The ITU will benefit from allowing Sector Members to participate in all key discussions and meetings. This is not always the case; for example, the Council Working Group on Internet-Related Public Policy and some of the regional Study Groups do not allow participation of some or all Sector Members. In the GSMA’s case, because our Head Office happens to be located in London, we are barred from attending some regional Study Group meetings, even though we have operator members, local staff and large GSMA offices in Latin America, Africa and Asia. We believe the ITU should not only allow but also actively welcome all Sector Members to participate in all such discussions and should recognise the value that voluntary private sector participation can bring.

**2. Minimise costs:** In addition to the fees for ITU Sector Membership, there are considerable resource and travel costs associated with attending ITU meetings. With the introduction of new Focus Groups, Rapporteur Groups, Study Groups (SG20) and regional Study Groups over the past two years, the number of meetings has proliferated. We find that many of the topics that are being introduced in these meetings are duplicative of work already under way, either in other parts of the ITU or in other organisations and institutions. We urge the ITU to look for ways to minimise the introduction of duplicative work, particularly by undertaking research before adopting new work items, and to focus on prioritisation and streamlining so that important topics can be given adequate discussion time within the existing meetings framework. Allowing local staff within global Sector Member organisations to attend regional meetings would also minimise travel costs.

**3. Use of industry evidence and expertise:** Industry expertise, information and data should form a central part of ITU discussions alongside input from Member States. This will help root decisions in the reality of operating communications services in today’s liberalised markets and will strengthen the robustness of ITU Recommendations and other outputs. Such an approach will also encourage industry participation. We believe that Study Group and Working Party chairs should be encouraged to treat Sector Member and Member State input equitably, recognising the value that both the private sector and the public sector bring to the discussions.

4. **Process and procedures**. The GSMA believes continued commitment to documented ITU process and procedures is vital, particularly in relation to document introduction, consensus determination, pre-determined outcomes and accurate meeting reporting, especially in Study Groups. Such a focus is vital to a collegial and collaborative environment and to strengthen relationships between all parties.

In light of these recommendations, and in order to encourage participation of Sector Members, the GSMA supports the ITU focusing on the following key priorities for 2020-2023:

1. The ITU should stay within its clear remit in order to be effective and minimise costs and should not focus on new and emerging internet technologies, which are in the nascent stages of development, where other organisations are already engaged in standards and regulatory framework development.
2. The ITU should recognise the importance of all stakeholders, including industry service providers, in developing and investing in current and future technology for connectivity. Market-based approaches to the development of technologies should be embraced by the ITU. Attempts to globally regulate some technologies will have a negative impact on connectivity and connecting the unconnected. The ITU should avoid interference in global markets where it would hinder ongoing investment.
3. ITU-D should focus on engaging members to participate in capacity building. Capacity building should focus on increasing connectivity to lesser-developed and underdeveloped countries and take into account the fact that connectivity can underpin achievements in the Sustainable Development Goals.
4. ITU-T should seek to minimise or terminate work that does not focus on standards for international telecommunications and that is duplicating work already taking place in other standards development organisations. In particular, the ITU-T should recognise that other standards organisations hold specifications and recommendations that are within their remit. Duplication of standards work is financially costly for all parties, both public and private sector, and savings can be made by ceasing current work in the ITU-T which is duplicative. We urge ITU-T to engage actively itself in the work of other fora where relevant, instead of introducing ever more focus groups and other workstreams within ITU.
5. In ITU-R, the 2020-2023 timeframe sits between two crucial World Radiocommunication Conferences, which will define the future development of mobile networks. WRC-19 will decide on the development of bands above 24 GHz for IMT and their planning and use on a global basis will depend on harmonisation both through regional groups and globally at the ITU. WRC-2023, meanwhile, is already set to consider the future use of spectrum below 1 GHz in Region 1, which has already been discussed in other Regions.

Both these elements will allow access to vital future spectrum that will be the backbone of next-generation mobile broadband networks capable of delivering a huge range of services to the world’s citizens. The ITU-R’s stewardship of discussions including Member States and Sector members alike can benefit the access to harmonised spectrum, which is vital for future generations of affordable mobile services.

Both WRCs will demonstrated the need to share spectrum on an equitable basis, and a fully modernised approach including up to date network parameters for all services must be encouraged. Industry input to this is vital. Looking at highly congested spectrum bands on a long-term basis will also be vital to ensuring that all services are able to fairly share the airwaves for the foreseeable future.

Overall, in 2020-2023 the ITU should focus on its core remit of international telecommunications. By doing this, duplication of work being done in other institutions and organisations will be avoided. Additionally, the ITU needs to minimise its spending and cut costs in order to be an effective and efficient organisation. Focusing on enabling capacity building for achievement of the sustainable development goals could be a notable achievement for this period, though capacity building should be done in partnership with other stakeholders where possible to ensure provide evidence-based learning and minimise costs.