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RE: ITU GSR Consultation

The Institute of Electrical and Electronics Engineers Standards Association (IEEE SA) welcomes the opportunity to contribute to this consultation on regulatory governance for digital markets.

IEEE is a public charity and the largest organization of technology professionals in the world dedicated to advancing technology for humanity, with more than half a million members in over 190 countries. Through its Standards Association, it is a global standards developing organization (SDO). IEEE provides a globally open, collaborative environment that enables people and entities to work together to develop market-relevant technology solutions, approaches with the aim to help shape a better, safer and sustainable world.

Effective digital governance depends on integrating regulatory frameworks with technical standards. Standards help translate policy insight into practical frameworks that organizations can apply consistently. They help create shared protocols so that data becomes comparable, decisions can become clearer, and accountability possible. In other words, they help carry innovation from research into practice.

Digital markets are cross-border, rapidly evolving, and systemically significant. Traditional rule-based approaches alone are insufficient to ensure outcomes such as competition, resilience, safety, and inclusion. A modern governance framework must combine outcome-based policy with standards-based implementation mechanisms.

IEEE technical standards, such as the [IEEE 7000](#)TM series (ethical system design), [IEEE 802](#)→ (networking and connectivity, and [IEEE 1012](#)TM (system verification and validation), illustrate how technical standards can translate policy objectives into measurable, testable, and interoperable requirements.

1. What is the baseline toolkit for digital governance – beyond rules?

A credible baseline toolkit for digital governance should combine clear obligations with practical mechanisms that shape behavior, generate evidence, and enable correction over time. Rules remain necessary, but they are not sufficient on their own. Regulators should have a core set of governance essentials that includes five elements.

There should be core duties and outcome-based obligations that apply across digital sectors. These should include duties of care, transparency, risk management, non-discrimination, security, resilience, accessibility, and accountability. These duties should be framed around outcomes rather than prescribing one fixed technical method, so that firms can innovate while remaining responsible for the real-world effects of their systems and services.

Regulators need incentive levers that encourage compliance before harm occurs. These can include safe harbors for good-faith compliance, regulatory recognition for high-performing firms, procurement preferences, certification schemes, interoperability incentives, and proportional compliance pathways for smaller actors.

Oversight and assurance mechanisms are needed. These include mandatory internal controls, independent audits, impact assessments, incident reporting, recordkeeping, explainability requirements where appropriate, and board- or senior-management accountability for major risks. Regulators should be able to see whether firms have the capacity to identify, manage, and remedy risks, not just whether a written policy exists.

Governance should include adaptive and experimentation tools. Because digital markets and technologies evolve quickly, regulators need mechanisms such as regulatory sandboxes, pilot authorizations, sunset clauses, review triggers, and iterative codes of practice. These tools allow supervision to keep pace with innovation while learning from evidence.

need engagement and coordination practices. Effective governance depends on structured engagement with consumers, civil society, technical experts, industry, and peer regulators. It also requires coordination across competition, telecommunications, consumer protection, data protection, cybersecurity, and sector-specific authorities. Many digital harms cut across mandates; governance should do the same.

Taken together, these governance essentials create a system that is evidence-based, and adaptable. A goal is not simply to have more rules, but to build durable institutional capacity to steer digital systems toward public-interest outcomes. Open, consensus-based technical standards are a foundational component of this toolkit, enabling regulators to translate policy objectives into measurable, interoperable, and technology-neutral governance practices.

2. How can governance essentials be made measurable and enforceable across sectors?

Governance essentials must be measurable and enforceable to be effective. Standards are critical for helping to define measurable outcomes, evidence frameworks, and interoperable reporting mechanisms. For example:

- Meaningful connectivity can rely on standards for service quality and performance
- Accessibility can be evaluated using standards for inclusive and accessible design
- Reliability and resilience can leverage standards for system robustness and redundancy
- Consumer harm reduction can use standards-based risk assessment and mitigation approaches
- Market contestability can be supported through interoperability standards

Standards help ensure consistency across sectors and jurisdictions, while avoiding prescriptive regulatory mandates.

Standards help enable scalable compliance models, ensuring that smaller entities are not overburdened while systemically important actors meet higher assurance requirements. By grounding governance in standards-based metrics and reporting, regulators can create measurable, enforceable, and innovation-friendly governance frameworks.

3. What should a predictable, graduated supervisory and enforcement pathway look like when risks rise or harms occur?

A predictable supervisory pathway should be graduated, transparent, and risk based. Global standards play an important role in helping to define expectations, escalation thresholds, and remediation benchmarks.

- Standards-based performance thresholds can help define when escalation is warranted.
- Standards enable objective verification of remediation and recovery.
- A standards-informed supervisory pathway promotes predictability, fairness, and technical rigor.
- Standards can also serve as baseline references for identifying gaps and recommending improvements.

4. Cross-cutting lens: *Across all three questions, how can regional, subregional and international cooperation reduce fragmentation and strengthen regulatory effectiveness in cross-border digital ecosystems?*

Regional, subregional, and international cooperation is essential because digital ecosystems operate across borders, while most regulatory mandates remain national. Without cooperation, firms face conflicting requirements, regulators may duplicate efforts, and harms may slip through jurisdictional gaps.

Digital ecosystems are inherently cross-border. Without coordination, fragmented governance increases costs, can weaken enforcement, and creates regulatory gaps. In cross-border digital ecosystems, effective governance increasingly depends on globally aligned standards, cooperative oversight, and shared evidence frameworks. These mechanisms reduce fragmentation, strengthen regulatory effectiveness, and support innovation while protecting public-interest outcomes.

Conclusion

Global standards-based governance provides a practical bridge between policy objectives and technical implementation. Open, consensus-based standards:

- Enable measurable governance outcomes
- Support proportional oversight
- Reduce fragmentation across jurisdictions
- Encourage innovation and responsible development
- Improve trust in digital ecosystems

Incorporating standards into digital governance frameworks helps strengthen regulatory effectiveness while maintaining flexibility and innovation.