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**Document Number : WSIS+10/3/104**

**Submission by: Internet Infrastructure Coalition, Civil Society**

***Please note that this is a submission for the Third Physical meeting of the WSIS +10 MPP to be held on the 17th and 18th of February.***

**Internet Infrastructure Coalition (i2Coalition) Comments on**

**Suggested Revisions to the WSIS+10 Statement on the Implementation of WSIS Outcome**

**Received at the Second Meeting of the MPP**

The i2Coalition is pleased to present the following comments and, if necessary, line revisions to the WSIS+10 Statement on the Implementation of WSIS Outcome (WSIS+10 Statement) that resulted from the second MPP meeting (Revisions). The i2Coalition is a diverse group of Internet infrastructure providers, whose members come from many different nations. A description of the i2Coalition follows these comments.

**Summary**

The i2Coalition supports the broad goals of the WSIS+10 process. However, commentary to the WSIS+10 Statement indicates that the process may have strayed from its goals in the following areas:

1. The Revisions have led to a WSIS+10 Statement that may not be capable of adoption by consensus.
2. A number of Revisions seek to move the WSIS process away from the multistakeholder approach to a government centered, regulatory based, approach.
3. The Revisions identify specific participants in the multistakeholder process, marginalizing the participation of other participants.

The i2Coalition recommends that the delegates to the MPP session in February consider the following recommendations:

1. Revisions that seek to add paragraphs not central to the Goals (as defined below) be rejected.
2. Revisions that establish a government and regulatory influence on Internet policy clearly state that such influence be exerted through multistakeholder processes.
3. References to particular multistakeholder entities be removed, unless doing so would render a paragraph meaningless.
4. To the extent possible, paragraphs be combined in ways that make the WSIS+10 Statement concise.

**Discussion**

The i2Coalition’s understanding of the WSIS+10 process is to use the successful multistakeholder approach to Internet governance to continue to create a “people-centered, inclusive and development oriented Information Society” (the “Goals”) The i2Coalition believes that the WSIS+10 Statement can best move the Goals forward only if it remains tightly focused on them.

The Revisions contain recommendations to add substantial text to the Statement. These recommendations have the very real possibility of creating a document that cannot be agreed upon by the delegates to the High Level Event. Not only would such an outcome seriously jeopardize the WSIS goals, it would undermine the multistakeholder approach by serving as “evidence” that participants in the approach are not capable of creating consensus guidelines. The Internet governance process is at a critical moment in its operation and would benefit greatly from adoption of a text that is achievable and realistic.

The i2Coalition takes the position that the Goals are in fact achievable. As an organization comprised primarily of global small to medium sized business, we consistently work to meet the goals set for ourselves, by the world community and by stakeholders. The WSIS+10 Statement should do the same. The WSIS+10 Statement, while remaining aspirational, should also contain achievable goals. Revisions that seek to add goals that have already been rejected by participants should not be included in a document that seeks consensus at the High Level Event.

In particular, the i2Coalition has identified a number of Revisions that seek to establish the primacy of the role of governments in the execution of the goals and action lines in the WSIS+10 Statement. The role of governments in the final WSIS+10 Statement cannot be minimized. However, the multistakeholder approach that has been specifically adopted in the WSIS+10 process does not acknowledge the primacy of that role. The multistakeholder approach has successfully incorporated governments in the Internet governance process. To the extent governments seek to establish a primary relationship to Internet governance, there are other forums better suited for discussion of this issue. Revisions that seek to make the role of government prime, do not have a place in the WSIS+10 Statement. The i2Coalition supports exploring additional methods of increasing multistakeholder cooperation, and believes that CCIA’s suggestion for a “Friends of the Chair” group is worth exploring.  We join with ISOC in their concerns regarding the “processes and modalities of the Outcome Documents.”

The i2Coalition is mindful, and grateful, for the role played by the organizations incorporated into the multistakeholder approach. These organizations are responsible for the approach’s success. The organizations each serve an extremely valuable role in ensuring that not only does the Internet continue to function at a technical level, but that the Goals are considered in every aspect of the governance process. However, the Revisions contain a number of references to specific governance organizations. In most cases, the organizations called out in these specific references do not by themselves, advance a particular Goal or action line. Including them may be interpreted as indicating that a particular organization is the sole forum for implementation of an individual action line. These inclusions should be rejected unless including them is critical to implementation of understanding.

Finally the i2Coalition recommends that paragraphs be combined where possible. A number of commentators have suggested that paragraphs containing the same, or similar, subject matter be combined. The i2Coalition agrees with this approach. Doing so will lead to a document that is clear, concise, and is more likely to achieve consensus adoption at the High Level Event.

**Specific Recommendations**

Without taking away from this statement, or the i2Coalition’s support of point one in the CCIA statement, the i2Coalition has the following specific commentary on the Revision:

1. Document S2/B
	1. Paragraph 26. The revisions should be consolidated so that the resulting text recognizes the applicability of ethical codes, self-regulation, multistakeholder governance and governmental regulations as equal and in some cases, complimentary, modalities of Internet regulation.
2. Document S2/C/rev1
	1. Paragraphs 29 through 26 express points important to achieving the Goals by preserving the openness of the Internet from both a technical and regulatory standpoint. These paragraphs should not be deleted.
	2. Paragraph 44. The i2Coalition supports the principles set out in this paragraph and looks forward to the alternate text to be provided by the United Kingdom.

**About the i2Coalition**

The i2Coalition supports those who build the nuts and bolts of the Internet, and we treat it like the noble profession that it is. We believe the continued growth of the Internet is vital for growing an environment of innovation and seek to engage in ways to foster success of the Internet and Internet infrastructure industry. We seek to influence decision makers to weigh decisions on whether they are good or bad for the Internet economy and its foundational industries. In short, we seek to foster growth within the Internet infrastructure industry by driving others to harness the Internet’s full potential.