

Before the
U. S. DEPARTMENT OF STATE
Washington, DC 20521

United States Proposals and Positions for the)
U.S. Delegation to the 2020 World) Public Notice: 11020
Telecommunication Standardization Assembly)

COMMENTS OF ERICSSON

Ericsson appreciates the opportunity to provide comments to the Department of State’s Public Notice regarding the *United States Proposals and Positions for the U.S. Delegation to the 2020 World Telecommunication Standardization Assembly (WTSA–2020)*.¹ As a world-leader in groundbreaking innovations and their subsequent implementation as global standards, Ericsson has become a trusted partner and recognized leader within Third Generation Partnership Project (“3GPP”) and other major standardization organizations.

Today, Ericsson occupies a unique position both leading and assisting in the development of standards for all major mobile and fixed communication systems, creating the largest innovation platform for consumers, industries and society. Due to this, Ericsson believes it is in a distinct position to offer the following input to assist in developing and refining the U.S. approach for its participation as the U.S. Government prepares for the upcoming International Telecommunication Union (“ITU”) 2020 World Telecommunication Standardization Assembly (“WTSA 2020”).

¹ 85 Fed. Reg. 6256 (Feb. 4, 2020).

Objectives and Priorities at WTSA 2020

Achieving a U.S. Vision for ITU-T

As an overarching matter, Ericsson believes that encouraging industry input and engagement in the U.S. delegation at WTSA 2020 is critical to ensuring U.S. objectives are met. Industry appreciates the support of the U.S. delegation to counter the view by some ITU member states that *governments*, not industry, should set the direction for standardization. A strong industry presence in the planning processes and the conference itself will demonstrate to the world that the U.S. and its like-minded partners view an industry-led standards process as crucial to ensuring innovation, global harmonization, and economic growth. At a high level, Ericsson believes the U.S. delegation should adopt the following goals for WTSA-2020:

- Ensure that the ITU-T Sector (“T Sector” or “ITU-T”) does not expand its mandate beyond its statutory responsibilities defined in the ITU Constitution and Convention.
- Encourage WTSA 2020 to recognize the importance of industry engagement in the work of the Sector.
- Strengthen the T Sector’s efforts to coordinate, collaborate, and engage with other Standards Development Organizations (“SDOs”), forums and consortia.
- Support the appointment of individuals from industry to leadership positions in the study groups and the ITU’s Telecommunication Standardization Advisory Group (“TSAG”).

Role of ITU-T

The T Sector has a particularly important role to play in areas such as the development of standards for optical transport networks, access networks, home networks and power utility network infrastructures, systems, equipment, optical fibers and cables. ITU-T Study Group 15 - Networks, Technologies and Infrastructures for Transport, Access and Home (“SG15”) is the home for this area of standards development within the ITU. Other areas of importance include the joint activity by Study Group 16 with ISO/IEC JTC 1 SC29, a standardization subcommittee of the Joint Technical Committee ISO/IEC JTC 1 of the International Organization for

Standardization (“ISO”) and the International Electrotechnical Commission (“IEC”), on multimedia codecs. For these established areas of expertise, the ITU’s T Sector is the recognized leader in standardization. Ericsson sees this first-hand as our customers request that our products support these T Sector Recommendations.

In emerging areas of technology, however, the T Sector has less influence with industry as most new ideas are developed in new fit-for-purpose forums or in other SDOs where a specific topic would be more logically within scope. There remains an appropriate role for the T Sector to play by educating both ITU member states as well as the developing countries on the advancements taking place in these other organizations. Structures like Joint Coordination Activities (“JCA”) have been successful, for example, in the case of IMT-2020 to highlight the effort underway to support 5G in other organizations. This has been valuable for the T Sector community. In addition, new and revised processes in ITU Recommendations A.5 and A.25 allow the ITU-T to reference or even “adopt” the work of other organizations if it is viewed as important to increase visibility with member states or developing countries.

Relevance of T Sector Recommendations

Some T Sector Recommendations are relevant: for example, areas such as transport, access and home networks in SG15. SG15 leads standardization on optical fiber optical networks with Recommendations such as G.652 on single-mode optical fiber and G.709 on the optical transport network consistently leading the top downloads. Joint activities with ISO/IEC JTC1 SC29 in SG16 are also relevant, with the H.264 video codec winning Emmy Awards as well as being a top download. Most new activities driven by industry in these study groups are market relevant, timely and fit for purpose.

Working Methods and Rules of Procedure

Timeliness of Developing Standards

The Alternative Approval Process² for new and revised ITU-T Recommendations functions well as a means of developing market-relevant global standards in a timely fashion. As a general matter however, the ITU, as an intergovernmental organization, is constrained by its obligation to reflect the concerns and priorities of Member States, which may be inimical to the priorities of industry. The imposition of the Traditional Approval Process (“TAP”) for ITU-T Recommendations is an example of a working method which inhibits the production of timely standards. Among other reasons, the TAP causes delays through the need for translation of Recommendations into multiple languages, as well as a required 3-month review period for member states.

Improving T Sector Working Methods

The work of the T Sector should be driven by a bottom-up, contribution-driven, consensus-based approach, which is the how ITU-T Study Groups operate. The proliferation of focus groups on a wide variety of subjects could erode this method of working by complicating the ability of T Sector members to participate in the work effectively. One example of how focus groups can muddy the waters occurs when informal white papers from some focus groups are rapidly progressed as Recommendations in parent study groups with little awareness or scrutiny by Study Group members.

Given the benefit of industry engagement in the T Sector, WTSA 2020 should focus on creating a structural environment that would improve industry engagement *across* the areas of

² Recommendation ITU-T A.8, *Alternative approval process for new and revised ITU-T Recommendations*, Oct. 2008, available at <https://www.itu.int/rec/dologin.asp?lang=e&id=T-REC-A.8-200810-I!!MSW-E&type=items>.

ITU-T expertise. Specifically, following industry guidance on the study group structure should increase industry participation and the impact of ITU-T standards in the market. At WTSA 2020, given the opportunity of a number of term-limited Study Group chairmen, an effort must be taken to reduce the number of study groups such that they are efficient and have relevant industry-driven standardization topics to work on.

Metrics to Determine Value, Effectiveness of T Sector Output

One method of determining the value of ITU-T output is correlating the industry participation in a particular Study Group or Groups to the number of downloads of Recommendations from those groups.³ The metrics and correlations show that industry participation has a clear impact to the value of ITU-T Recommendations in the market.

While industry generally can be taken to demonstrate the overall impact, further sub-categorization of industry (e.g., operators, or more detailed vertical and/or horizontal industry segments) would show what areas attract which industry segments. While Ericsson can currently say that it may be beneficial to focus industry engagement on the high-value study groups, further categorization could be topic and area specific. Additional metrics at a lower granularity (e.g., working party or question level) may also be useful, but the raw data is not yet being collected by the Telecommunication Standardization Bureau (“TSB”). Finally, novel metrics that show the value of ITU-T in the industry would also help evaluate its impact. For example, “mentions” of ITU-T study groups or Recommendations in press articles, magazine articles, and even patents could be useful metrics.

³ Ericsson led the analysis of existing metrics and presented them in September 2019. See Contribution 87, ITU-T TSAG (Study Period 2017), *ITU-T Industry participation metrics: Assessment and way forward*.

Participation in the ITU-T

Ericsson currently participates as an ITU-T Sector Member from Canada and Sweden. As a large multi-national corporation, Ericsson is involved in standardization activities in over 100 organizations based on business need and customer requests. Our level of engagement is subject to change as our business priorities evolve with the market. For the immediate future, there is no change contemplated in the participation level in the work of ITU-T, as there remains business value in some of the work of ITU-T, particularly in Study Groups 15, 16, 12, 5 and the TSAG.

Ericsson believes in the value of the industry driven standardization work of SG15 that is focused on transport, access and home networks. Ericsson has been participating in this work for multiple decades in support of industry driven standards to support our business. Based on our knowledge and experience, industry leadership has been the key to the success of this group with its current study group chairman from Nokia, and previous chairs from NTT and Nortel. We would like to continue this success and have offered a candidate for SG15 chairmanship through our Ericsson Canada sector membership.

U.S. Government Prioritization of Study Groups and Activities

The priority of U.S. Government support should be based on the relevance of the work of the ITU-T to industry. However, there is also the need to support countermeasures against other administrations which seek to broaden the scope of the ITU-T or advance questionable work in Study Groups or focus groups that are not as relevant to industry.

Capacity-Building, Cooperation and Collaboration

Needs of Developing Countries Regarding International Standards Development

ITU programs related to development and capacity building should be executed on a partnership basis between ITU-D and ITU-T, in recognition of the “one ITU” concept reflected in the ITU Strategic Plan. The ITU addresses regional or developing country needs through its network of regional and area offices. The point is that there should be no capacity building activity in ITU-T without a corresponding driver or requirement in ITU-D.

In addition, developing countries would benefit from ITU aggregating or summarizing the work of other SDOs or organizations that have relevant new or emerging standards. The goal would be to educate and drive capacity building in these new areas without ITU-T going outside its mandate to develop new or overlapping standards in these areas.

ITU-T's Involvement with Other Standards Setting Organizations

As collaborative and cooperative arrangements with other SDOs strengthen, it would be expected that a best-practice approach would be implemented to improve efficiency and effectiveness, in line with the principles of results-based management.

Now that the logistics of incorporating text from other organizations has been vetted in the revised Recommendation A.25, there are multiple paths (with referencing through Recommendation A.5 preferred) for the work of other organizations to be recognized within ITU-T. ITU-T and its member states should recognize that it does not need a new Recommendation on every new and emerging topic, especially if a reference to existing industry

driven work is sufficient to support the needs of capacity building for member states and developing countries.

Respectfully Submitted,

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