

RIPE NCC Response to CEPT WTSA-20 Questionnaire

17 December 2019

Q1: What do you expect from ITU-T in the forthcoming study period 2021-2024 both in terms of ITU-T's strategic area for technical work and its position in the global standardisation landscape?

With many policy discussions relating to new and emerging technologies, we expect ITU-T to remain focused on its core mandate, to work on those technologies that are relevant to standardisation in telecommunications, and to limit the scope of such work to only cover telecommunication networks as they are already defined under the ITU-T framework.

Q2: In your opinion, are there any new standardisation issues that should be covered by ITU-T?

We do not see any new standardisation issues to be covered in ITU-T discussions at this time, although the dialogue with regard to international use of phone system identifiers needs to continue and be resolved, as many cross-border network operations (including IoT services) rely on E.212 and similar numbering systems for lower layer transmission services.

Q3: In your opinion, are there any ITU-T activities which you consider to be no longer relevant, particularly considering the ITU's aim to elaborate some international standards (Recommendations)?

We appreciate some of the exploratory work being undertaken in researching future options for next-generation networks, but with many of those networks being built on Internet protocol technology and standards developed in other consortia, such as 3GPP, there is a question of whether the ITU-T is still an appropriate venue to develop standards Recommendations in this field, especially when they may overlap or evolve work developed in other standards development organisations (SDOs), including the IETF.

The RIPE NCC has been a party to some discussions over the past two years that illustrated this point (particularly in regard to ITU-T work overlapping with the work of the Regional Internet Registry communities), and we would encourage all ITU stakeholders to be aware of the risks here, particularly as such situations have the potential to use significant time and resources for little effect.

Q4: How can Europe take advantage of ITU-T, as a specialised sector of a UN specialised agency, when compared to other worldwide or regional standards developing organisations (SDOs) or ICT fora?

Global coordination remains an important aspect of the Internet and Internet-connected networks. With an ever-expanding landscape of different SDOs working in this space, ITU-T can play an important role in selecting particular solutions and providing implementation guidelines for existing standards to ensure global interoperability.

Second, we must note that many standards developed by other SDOs incorporate or rely on Recommendations developed by ITU-T, such as in the field of video and audio encoding. It is

important to maintain expertise in this field and to maintain and evolve those technologies (e.g. H.323 and G.7xx).

Q5: How can Europe better promote EU priorities, for example, initiatives defined in the [EU Rolling Plan for Standardisation](#)?

Q6: What are your views on the number and scope of the existing ITU-T Study Groups? Do you have views on how ITU-T could be restructured in order to be more efficient and effective?

Due to the number of different Study Groups and the lengthy meetings, participating in ITU-T is very time consuming, especially for smaller Sector Members. In that sense, reducing the number of Study Groups could lead to more effective participation from the industry sector.

Based on the number of Focus Groups, Joint Coordination Activities and Liaisons between different Study Groups, there is substantial overlap. Reducing this overlap by narrowing or better defining the scope of remaining Study Groups could reduce the time and resources needed for coordination between groups.

Q7: What are your views on the number and effectiveness of 'other' ITU-T Groups, such as Regional Groups, Focus Groups (FGs), Joint Coordination Activities (JCAs); Global Standards Initiatives (GSIs)?

While Regional Groups remain an important vehicle to engage with a broader audience, they cannot replace the main Study Groups and can, to some extent, lead to duplication of efforts, with similar discussions going on at both the regional and global levels.

Focus Groups, on the other hand, while sometimes necessary to ensure coordination, especially where multiple Study Groups are involved, also add substantially to the workload. Resources needed to attend the additional meetings, and to read and respond to proposals can significantly impact budgets and become an obstacle to effective and meaningful participation in ITU-T's activities, especially for smaller Sector Members.

Q8: Are the mandates for 'other' groups, and the interfaces between them and TSAG/Study Groups, sufficiently clear?

There appears to be some variation in the relationships between the different groups, so while the mandate is usually clear, the actual reporting relationship in relation to the group's deliverables is not that clearly defined.

As most Focus Groups are time constrained, this becomes less of an issue than for open-ended groups. Also, one of the effects of the regional groups is that they exist at different levels, where the relation between the "regional parent" and the "Study Group parent" is not always properly defined.

Q9: How can CEPT ensure that the mandate of each Study Group, and their respective "Questions", does not overlap with activities undertaken by other SDOs or within other sectors of the ITU itself?

A more narrow definition of scope and deliverables, combined with clear definitions, should lead to improvements over time. It might also help to avoid very broad objectives, such as “next generation” or “Internet of Things” in the title or scope of Study Groups, as such descriptions are broad enough to encourage work on nearly every technological aspect and can increase the risk of “venue shopping” with proposals for new work.

Such broad definitions can also cause overlap, leading to the need for resource-intensive coordination between different groups.

Q10: Do you agree that a gap analysis should be undertaken before any new standardisation work item is agreed in ITU-T in order to ensure that any significant duplication or overlap with work already undertaken within other SDOs is duly accounted for and that the appropriate co-operation mechanisms are put in place?

Although resource-intensive, it would indeed help if every proposal for new work were to be preceded by a well-documented gap analysis that lays out why the work is being undertaken and avoids duplication of work, both within the ITU and in other SDOs.

The concern is that those activities are not always well known, which probably requires the gap analysis to involve greater public awareness and a request for comments to allow for other stakeholders and SDOs to indicate possible overlaps.

Q11: What impact (if any) do you see the UN General Assembly’s Sustainable Development Goals (SDGs), the UN Broadband Commission, the WTPF or the WSIS having on work in ITU-T?

Q12: Do you think ITU-T governance needs to be reviewed?

The relationship between TSAG and the Study Groups is not always clear, especially when it comes to interpreting and applying A-series documents.

There also appears to be the possibility to use TSAG as a shortcut for the around lengthier global processes to create sub-groups. While this can be efficient, it has allowed a smaller group of the membership to approve new activities (or expand the scope of existing activities).

Q13: Should ITU-T working methods be reviewed? This could include, for example, the mechanisms to adopt final Recommendations i.e. the Traditional Approvals Process (TAP) and the Alternative Approvals Process (AAP).

It would be useful to review the requirements under which AAP can safely be applied, especially in relation to the growing impact of ICTs on socio-economic aspects and the ever-growing body of regional and national legislative instruments, such as GDPR, which might be applicable to the proposed or recommended framework and should warrant the Traditional Approval Process as the default.

Q14: What concrete use does your organisation make of ITU-T Recommendations? Can you provide any (non-confidential) example of a recent use of such recommendations?

The Resource Public Key Infrastructure (RPKI), by way of the IETF standards, has been built on mechanisms and data models which are defined and maintained as ITU Recommendation X.509.

Q15: Are you interested in participating in the Regional Groups of the ITU-T Study Groups?

We see benefits in the ongoing engagement with regional groups such as CEPT, RCC and Arab group. We have concerns around the existence of regional sub-groups for ITU-T study groups as they introduce some duplication and can be quite resource demanding. Regional groups also risk reducing the transparency of the decision-making process, as participation is often limited and only the consensus result is contributed to the global level meetings.