APC welcomes the opportunity to comment on the First Draft Outline of the Report by the ITU Secretary-General for the Sixth World Telecommunication/Information and Communication Technology Policy Forum 2021 (WTPF-21). In particular, we welcome WTPF-21’s emphasis on the potential contribution of information and communication technologies (ICTs) to the 17 Sustainable Development Goals (SDGs). ICTs have enormous potential to strengthen social, political, cultural, economic and human development.

In developing solutions and policy frameworks for the WTPF-21 thematic areas, it is critical that sustainable development – economic growth, social inclusion and environmental protection – be part of the considerations, with appropriate questions on the contribution or risks that each of the proposed solutions might have on these factors.

In reviewing the draft outline, we have been impressed by the scope of the questions in each of the themes. APC believes, however, that the questions in each of the areas should be centred around the impact that developments in these areas will have on social, political, cultural, economic and human development.
Additionally, APC recommends that in all of the work of the WTPF-21, attention is paid to the creation of digital solutions that respond to the environmental crisis facing our planet. In order to meet the 17 SDGs, the ITU needs to be concerned with a sustainable planet to sustain those goals.

**Continuing importance of meaningful access**

In order for the use of ICTs to enable sustainable development, meaningful access, including both connectivity and capacity, is necessary. While much progress has been made, affordable and reliable access is still not sufficiently available in many parts of the world, reinforcing existing social and economic inequalities and making the achievement of the SDGs more difficult to achieve.

In least developed countries (LDCs), the main focus for the SDGs, internet user penetration is below 20% (18%), with a decreasing year over year growth rate since 2014. This is affecting the expansion of mobile networks, which follow a similar plateauing growth pattern (3G coverage only grew by 1.2% last year, with more than 35% of the population in LDCs – more than 350 million people – still without coverage). Affordability of internet services is one of the main barriers. The poorest 20% in these countries need to dedicate more than 40% of their monthly income for 1 GB of mobile data, 20 times more than the target established by the Broadband Commission. Without addressing digital exclusion, leveraging new and emerging ICTs, such as the ones mentioned in the outline of the Secretary-General’s report (AI, IoT, 5G), risks deepening inequality and leaving people behind who stand to benefit most from the promise of sustainable development. Unless those divides are eliminated, and the underlying barriers causing them addressed, people will not have the access they need for the use of ICTs to meet the SDGs.

As a civil society organisation, and sector member of the ITU, we support the advancement of 5G and the goals listed in the draft outline; however, it should be noted that while 5G is an important technology, it is unlikely to reach all of the populations that require access in time to meet the 2030 target date for achieving the SDGs. In sub-Saharan Africa, where most of the LDCs are located, the GSMA estimates that the number of 5G connections by 2025 will be only 3%. We recommend that when looking at 5G, a package of compatible access methods based on existing models are considered. In particular, small and not-for-profit community operators are showing evidence of minimisation of costs that produce ICT solutions that are appropriate and affordable for developing regions. Updated innovative technology that allows secondary use of frequencies for 3G and 4G services allocated nationally but unused in rural and remote areas should be part of this package.

**Global public resource**

The internet is a global public resource that should be governed in the public interest. The sub-themes identified in the draft outline – IoT, AI, big data and OTT – raise a number of questions of public interest, including human rights. There is also widespread recognition that human rights are
essential to achieve sustainable development.\(^5\) While it is outside the mandate of the ITU to be defining or interpreting human rights norms or standards, in addressing these issues the human rights dimension needs to be recognised. This includes issues of privacy, access to knowledge, discrimination, and public accessibility that need to be considered while the defined questions are answered. Telecommunications technology is not value neutral. The questions posed in each of the sub-themes of the draft outline ignore this dimension of sustainable development.

**Gender perspectives**

The ITU has made strides in recognising the need to facilitate women's participation in the ITU. We recognise and commend the important work that the ITU has done in partnership with UN Women in relation to gender equality and women's empowerment. Beyond empowered participation in policy making, however, the ITU has also recognised the importance of mainstreaming a gender perspective in the ITU and the promotion of gender equality and empowerment of women through telecommunications/information and communication technologies.\(^6\) Resolution 70 (Rev. Dubai, 2018) instructs the ITU Secretary-General to ensure the inclusion of a gender perspective in all ITU contributions with respect to the priority areas that must be tackled for the implementation of WSIS Action Lines. Given that the draft outline recognises that the SDGs are also expected to drive progress in alignment with the WSIS Action Lines, and that the ITU has been leading efforts in the UN system to align WSIS Action Lines and the SDGs,\(^7\) it is surprising and disappointing that gender is nearly absent from the draft outline. APC would like to see the ITU more explicitly draw attention to and address the needs of women and of marginalised social and economic groups in the questions and answers to the questions discussed in the themes.

**Governance**

Several of the themes discussed in the draft outline speak to the roles of policy makers in creating technical solutions that support the global public interest. APC takes this opportunity to reiterate that policy, regulation and governance processes should be accessible, accountable, transparent and inclusive. We recall the definition of policy and regulation contained in the Geneva Plan of Action produced by the World Summit on the Information Society (WSIS): "Governments should foster a supportive, transparent, pro-competitive and predictable policy, legal and regulatory framework, which provides the appropriate incentives to investment and community development in the Information Society."\(^8\) We hope that the ITU will do all it can during the WTPF-21 to foster this view of governance.

**Inclusivity**

As a civil society organisation, APC is pleased to see that the WTPF-21 will utilise the modalities initiated during the previous WTPF, including the use of an Informal Experts Group (IEG). The participation of civil society on an equal footing remains one of our goals and this is one step in that direction.

Many years after the release of the Tunis Agenda, with its call for inclusivity, the ability of civil society and the general public to engage with the ITU's work on internet-related public policy issues is still significantly hindered by barriers to access to information, opacity in process and high entry cost. We are pleased that the ITU is showing a commitment to progress but encourage the ITU to take further steps to


\(^7\)https://www.itu.int/net4/wsis/sdg

foster inclusivity in the WTPF process, such as by proactively reaching out to civil society organisations, including those that are not sector members of the ITU, in soliciting input during the public comment period, utilising online platforms to garner input, and encouraging member states to hold consultations with interested stakeholders.

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About the Association for Progressive Communications
The Association for Progressive Communications (APC) is an international network and non-profit organisation founded in 1990 that wants everyone to have access to a free and open internet to improve lives and create a more just world.