APC submission on
"The developmental aspects
to strengthen the Internet"

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The Association for Progressive Communications (APC) is a membership-based network of organisations and activists with the mission of strengthening collective organising towards building a transformative movement to ensure that the internet and digital technologies enable social, gender and environmental justice for all people. APC is comprised of 62 organisational members and 41 associates active in 74 countries, primarily in the global South, and also works closely with various partner organisations.

On behalf of the Association for Progressive Communications, we would like to thank ITU very much for providing the opportunity to this submissions on "The developmental aspects to strengthen the Internet" to the Online Open Consultation for the ITU-Council Working Group on International Internet-related Public Policy Issues (CWG-Internet), prior to the its Twentieth Meeting, which we plan to attend.

Contacts: Dr. Carlos Rey-Moreno - carlos@apc.org and Mr. Mike Jensen - mike@apc.org

Short Summary

This submission outlines APC's position on Internet Policy and discusses the need to strengthen Internet development through multilateral and multi-stakeholder processes, particularly by addressing digital inequality, the gender digital divide, and environmental sustainability. It emphasizes the importance of including marginalized groups in global digital governance efforts, such as women, Indigenous communities, and those financially disadvantaged.

The document also highlights the role of community-centered connectivity initiatives in bridging the digital divide, especially in rural and underserved areas. It advocates for appropriate regulatory frameworks, licensing, and financial support to enable these small-scale, social-purpose operators to contribute effectively to digital inclusion. Additionally, it stresses the need for international cooperation based on principles of social justice, human rights, and environmental responsibility to ensure equitable access to digital technologies.

Responses to Main Questions

The developmental aspects to strengthen the Internet

1. How relevant multilateral and multi-stakeholder processes, including but not limited to UN-based processes such as Summit of the Future, WSIS+20 and the IGF, could address aspects related to Internet development?

The Summit of the Future, WSIS, the IGF and other global policy spaces addressing digital cooperation and governance should aim to prioritise key existing gaps and failures such as addressing digital inequality, the gender digital divide and environmental sustainability. The benefits and risks of digital technology do not affect or impact everyone in the same way, and unless there is more digital inclusion, divides between technology haves and have-nots will just grow.

In order to do so, it is paramount to ensure that the groups that have been the most affected by these exclusions have a more active voice and agency in global responses to the polycrisis. This position has actually been part of public discourse for many years, for example in the WSIS goal, as outlined in the Geneva Declaration, which is to "build a people-centred, inclusive and development-oriented Information Society where everyone can create, access, utilize and share information and knowledge, enabling individuals, communities and peoples to achieve their full potential in promoting their sustainable development and improving their quality of life, premised on the purposes and principles of the Charter of the United Nations and respecting fully and upholding the Universal Declaration of Human Rights." The WSIS+20 review is a unique opportunity to reinterpret this WSIS vision in light of the persistent, current and emerging challenges.

The WSIS review process therefore should:

- Review and adjust the WSIS action lines to respond to persistent and in some instances growing digital inequality.
- Address urgent global challenges and tensions such as those posed by climate change and degradation of our natural environment, which in many instances is exacerbated by digital transformation, while at the same time offering new tools to help mitigate or adapt to environmental damage.
- Respond to recent trends in digital technology innovation, as well as in evolving competitive environments and market structures.

- Map discontinuities and gaps in order to better understand the scope of the problem, such as the increasingly urgent imperative to operationalise universal meaningful connectivity and digital equity.
- Renew commitment to the WSIS principles of multistakeholder participation in light of renewed efforts towards truly transparent, inclusive, accountable and democratic governance of digital technologies at all levels, drawing on the NETmundial+10 São Paulo Guidelines.
- Integrate the Global Digital Compact (GDC) with the WSIS follow-up and implementation processes. The final draft of the GDC should make explicit reference to the WSIS review and forum as one of the spaces for updating information on implementation of the GDC commitments. The WSIS review should take into consideration the principles agreed during the GDC negotiations.
- Place intersectional gender justice at the core of the WSIS and GDC processes, ensuring that the governance, development and use of technology are inclusive, and benefit women and girls, in all their diversity, in order to prevent the deepening of gender inequality and promote equitable access and participation in the digital context.
- Place inclusion at the core of the WSIS and GDC processes through serious consideration of voices, perspectives and realities of people who are most affected and vulnerable on account of race, sexuality, caste, their location in cities or rural and remote areas, and among Indigenous groups. Communities in a situation of marginalization or vulnerability should be at the center of discussions and the WSIS process should seek their inclusion in the digital economy, with safety, autonomy and agency. In particular, Indigenous groups should have their active and meaningful role secured during the WSIS review process. In particular, they could contribute in defining digital transition standards that abide by environmental justice principles.

The multistakeholder principles of participation defined by WSIS and their practice, especially through the IGF, have contributed to strengthening partnership and collaboration which makes for more effective implementation. Unfortunately, these principles are not yet universally applied to ensure digital inclusion. The WSIS+20 process should build on the learning of almost two decades of implementation of the multistakeholder approach advanced by the IGF.

The recently adopted "NETmundial+10 Multistakeholder Statement: Strengthening internet governance and digital policy processes"[1] constitutes a valuable tool to address the disparities in applying the multistakeholder approach in an environment permeated by dynamics of power, conflicts of interest and difficulties in consensus building. To be meaningful, multistakeholder participation needs to be consistently inclusive at all levels – from local to global – and be accountable and transparent across the entire digital governance ecosystem.

2. What are the challenges and opportunities, good practices and favourable policy environments to strengthen the Internet, including in areas such as:

Intersecting social, economic and environmental crises require drastic changes to the traditional linear design/production/use/disposal models, with a shift to one that embraces a circular economy approach, aiming to eliminate waste and foster the continual reuse of resources. In this respect a critical assessment is needed of the impacts of the so-called digital/smart economy on communities' sustainable livelihoods from an environmental impact perspective, along with identification of the means to help mitigate negative impacts.

The world cannot be expected to meet net-zero goal by 2050 without significant improvements in all processes along the life cycle of digital devices. These include product designs that seek maximal durability, repairability and reusability, along with manufacturing that incorporates recovered materials from e-waste instead of mining for raw materials. In terms of practice, and practical steps, by acting together we can change the direction of development towards a more economically, socially and environmentally just world.

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[1] https://netmundial.br/pdf/NETmundial10-MultistakeholderStatement-2024.pdf

This requires recognition that business models which aim to maximize shareholder value through increased profits and gaining market share do not incentivize conservation of the natural environment: if anything, in the drive to stay ahead of business rivals and boost profitability they often do the reverse. This is equally true for digital corporations and e-commerce businesses. However quality of life and society's development increasingly depends on environmental sustainability – as does the economic viability of digital and other businesses[2].

These considerations also apply to the achievement of universal meaningful connectivity. While acknowledging the progress towards achieving the WSIS vision, after more than 20 years of deployments in developing countries, traditional telecommunication and mobile network operators have yet to meet universal access goals. These players continue to confront significant challenges in offering services to bridge the digital divide in remote and rural areas, and generally acknowledge these areas do not have a business case that meets their profitability requirements. Even where sufficient numbers of users exist to justify the infrastructure investment, statistics from the association representing mobile operators globally, show[3] that in rural areas, traditional operators only provide traffic-capped mobile broadband . These services are unaffordable for the majority of the population and explain the 'Usage gap' which has been identified by the GSMA as larger than the mobile coverage gap[4].

Ultimately, to improve the balance between profit maximisation and the goal of reaching meaningful connectivity, the time has come to fully review where socially driven investments are made and how effective they are at addressing digital inclusion. This reality also highlights the need to transition from financing mechanisms based on coverage targets of the SDGs, to those which meet the meaningful connectivity objectives established by the Office of the United Nations Secretary-General's Envoy on Technology and the ITU.[5] Within this context, the critical role that community-centred connectivity providers are beginning to play is gaining increasing attention as strategies to close the digital gap. Driven by different investment imperatives, these initiatives bring new assets to the economic calculus of deployment[6], and they have the added advantage of providing many important social and economic benefits to the community, including digital skills capacity building and diversity in language, content, culture, etc.[7]

Community-centred connectivity initiatives are part of the ecosystem of micro, small, and medium businesses that are the lifeblood of so many economies around the world, especially in the developing world, where they account for more than half of GDP in some countries. However, for historical reasons, community-centred connectivity initiatives are underrepresented in the telecommunications sector, which is more used to building and financing large national network operators. Yet, the more nimble and affordable small business models adopted by community-centred connectivity initiatives can play a critical and complementary role in providing affordable access. Therefore, diversifying national internet market structures is critical to unlocking broadband infrastructure in underserved areas, and also supports more sustainable development.

In many countries, lack of enabling regulation and appropriate investment mechanisms are holding back growth of community-centred complementary initiatives and thus limiting the potential for addressing affordable access challenges. There needs to be an appropriate licensing framework for small social-purpose operators that incentivises them to contribute to

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[2] Inside the Digital Society: Making the digital economy sustainable. D. Souter August 2024. Available at: https://www.apc.org/en/node/40292

[3]The State of Mobile Internet Connectivity Report 2023 https://www.gsma.com/r/somic/?ID=a6g1r000000xnptAAA&JobID=1709262

[4]'Usage gap' refers to those who live within the footprint of a mobile broadband network but are not using mobile internet. 'Coverage gap' refers to those who do not live within the footprint of a mobile broadband network.

[5]https://www.itu.int/hub/2022/04/new-un-targets-chart-path-to-universal-meaningful-connectivity/

[6]Chapter " Funding Bottom up Connectivity: Approaches and Challenges of Community Networks to Sustain Themselves" Available at: https://comconnectivity.org/wp-content/uploads/2021/12/Community-Networks-Towards-Sustainable-Funding-Models.pdf

[7]https://www.apc.org/sites/default/files/bottom-up-connectivity-strategies_0.pdf

solving the connectivity challenge. Of these incentives, lowering licence fees, or even waiving them, and reducing their administrative burden, are among the most important steps that can be taken.

At the national level, a few countries around the world are leading the way and have already created community network categories in their licensing frameworks. In Africa, Zimbabwe,[8] Uganda,[9] Ethiopia[10] and Kenya[11] have all included community networks within their regulatory frameworks, while South Africa proposes to include a new licence category specifically for community networks[12] following the recommendations from the Competition Commission that deemed mobile network practices anti-poor and requested support for alternatives.[13] In Latin America, similarly, Mexico and Argentina have created provisions for their recognition, with Colombia[14] and Brazil[15] working actively to enable them within their current regulatory frameworks. In Asia, Pakistan also added as part of their recently launched Digital Gender Inclusion Strategy a goal to "Facilitate the Establishment of Communty-based Networks" , with a target of 15 initiatives established in the next 3 years [16]

This aligns closely with the recommendations in the Best Practice Guidelines from the ITU's Global Symposium for Regulators (GSR) held in 2021, which specifically state that "[r]egulatory tools are at hand to bridge the funding and financing gap in digital markets" and identified the need to "[p]romote local innovation ecosystems and provide incentives for the participation of small and community operators in deploying low-cost rural networks, including specific licensing measures, access to key infrastructure and funding, and social coverage promotion programs."[17]

The GSR guidelines, together with recommendations from the Broadband Commission[18], among others, also point to the requirement for another related enabler: the need of community networks to access the mobile spectrum that is usually either unused or unassigned in rural areas in the global South. Mobile spectrum used in combination with WiFi and Fibre offers opportunities to bridge the digital divide more cost-effectively, including meeting Target 9c within the SDGs. Approaches to spectrum sharing are becoming widespread in the global North, but the adoption of innovative spectrum management strategies in the global South, where they are most needed, is still the exception.

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[8]Postal and Telecommunications Regulatory Authority of Zimbabwe Licence Fee Categories. http://www.potraz.gov.zw/wp-content/uploads/2022/03/Licence-Categories-Including-Fees.pdf

[9]Uganda Communications Commission Communal Access Provider License. https://www.ucc.co.ug/wp-content/uploads/2023/10/DESCRIPTION-OF-TELECOM-LICENSES-AND-AUTHORISATIONS.pdf

[10]Ethiopian Communication Authority's Telecommunications Licensing Directive 792-2021. https://cyrilla.org/en/entity/x1zaxn3r10k?page=1

[11]Communications Authority of Kenya Community Networks Service Provider Licence. https://www.ca.go.ke/sites/default/files/articles/Telecoms%20Forms/Application%20Form%20For%20Community %20Network%20and%20Service%20Provider%20

[12]South African Government Electronic Communications Amendment Bill: Draft. https://www.gov.za/documents/electronic-communications-amendment-bill-draft-23-jun-2023-0000

[13]Competition Commission of South Africa. (2019). Data Services Market Inquiry: Final Report. https://www.compcom.co.za/wp-content/uploads/2019/12/DSMI-Non-Confidential-Report-002.pdf

[14]Contreras García, V. (2023, 4 July). Gustavo Petro firma decreto para que comunidades autogestionen su Internet fijo. DPL News. https://dplnews.com/gustavo-petro-firma-decreto-para-que-comunidades-autogestionen-su-internet-fijo/

[15]Agência Nacional de Telecomunicações. (2023, 4 December). Publicado relatório com atividades realizadas pelo Grupo de Trabalho sobre Redes Comunitárias. https://www.gov.br/anatel/pt-br/assuntos/noticias/publicado-relatorio-com-atividades-realizadas-pelo-grupo-de-trabalho-sobre-redes-comunitarias

[16]https://www.pta.gov.pk/assets/media/digital_gender_inclusion_strategy_28-02-2024.pdf

[17]ITU Global Symposium for Regulators. (2021). Best Practice Guidelines. https://www.itu.int/en/ITU-D/Conferences/GSR/2021/Documents/GSR-21_Best-Practice-Guidelines_FINAL_E_V2.pdf

[18]Working Group for the Broadband Commission for Sustainable Development. (2021). 21st Century Financing Models for Bridging Broadband Connectivity Gaps. https://broadbandcommission.org/publication/21st-century-financing-models

As indicated earlier, a key source of funding should be from USFs, an important enabler that governments have at their disposal. Here progress has been slow, but change is starting to accelerate, especially in countries where a community network licence exists. The interest from regulators and policy makers is generally on the rise, as indicated by various workshops organised by APC in collaboration with ITU-D after Resolution 37 was approved – in Kenya, Indonesia, Nigeria, Cameroon and Colombia – and with regional regulatory agencies such as CRASA in Southern Africa and CITEL in the Americas. In addition, recent reports from the Broadband Commission[19] recommend that community networks should be beneficiaries of Univeral Service Funds (USFs) for extending affordable broadband access to commercially challenging rural and remote areas, to women and to low-income users.

In an example of USF funding specifically for community networks, Argentina created a mechanism within its USF to both incentivise the adoption of a community network licence and the use of the fund to help establish connectivity providers in underserved communities.[20] This mechanism does not prevent the regulator from supporting more traditional approaches, since the USD 3 million dedicated to these programmes represented 0.63% of the regulator Enacom's 2020-2022 budget.[21]

Similarly, in Kenya, its USF Strategy 2022-2026 is now looking to adopt financing mechanisms that will support 100 community networks and other complementary connectivity providers.[22] In both countries, civil society is playing an important role in building the capacity of these providers to meet regulatory requirements and to encourage collaboration between disparate projects. In addition, other countries such as Malawi[23] and Papua New Guinea[24] have proposed supporting community networks in their USF strategic plans for the coming years. This trend is expected to continue following the ITU's inclusion of community networks as one of the innovations recommended in its USF toolkit.[25]

While there have been a few examples of innovative financing mechanisms to support community-centred connectivity providers, the financial resources currently available are insufficient to help them scale to address the size of the problem, as most existing mechanisms are designed to address the needs of for-profit multi-million dollar endeavors. However in recent years international financial institutions such as the World Bank, Inter-American Development Bank,[26] the Asian Development Bank,[27] and other regional financial initiatives such as the European Commission's Global Gateway, have now also begun to show interest in these types of small local providers[28] although financial solutions from these institutions have yet to materialise, partly due to the relatively recent emergence of community connectivity providers.

Finally, more transparency is needed regarding the investment in and disposition of the physical infrastructure of the Internet. Just as ocean currents shaped emerging trade routes in the Age of Exploration, ownership and investment in fibre optic infrastructure, radio spectrum, and

[19]Broadband Commission Working Group on Broadband for All. (2019). A "Digital Infrastructure Moonshot" for Africa. https://www.broadbandcommission.org/Documents/working-groups/DigitalMoonshotforAfrica_Report.pdf and Working Group for the Broadband Commission for Sustainable Development. (2021). Op. cit.

[20]https://enacom.gob.ar/multimedia/noticias/archivos/202106/archivo_20210625022117_4017.pdf

[21]https://www.enacom.gob.ar/multimedia/noticias/archivos/202305/archivo_20230523045957_7544.pdf

[22]https://ca.go.ke/sites/default/files/CA/Strategic%20Plan/CA%20Strategic%20Plan%202023-2027%20Final.pdf

[23]There are plans to support 30 community networks during the period covered. See: Mlanjira, D. (2022, 20 May). MACRA launches Universal Service Fund's strategic plan. Nyasa Times. https://www.nyasatimes.com/macra-launches-universal-service-funds-strategic-plan/

[24]https://uas.nicta.gov.pg/index.php/consultations/10-uas-projects-consultations/70-public-consultation-uas-strategic-plan-2023-2027-and-proposed-uas-projects-for-2023

[25]https://www.itu.int/itu-d/reports/regulatory-market/usf-financial-efficiency-toolkit/

[26]García Zeballos, A., et al. (2021). Development of National Broadband Plans in Latin America and the Caribbean. InterAmerican Development Bank. https://publications.iadb.org/en/development-national-broadband-plans-latin-america-and-caribbean

[27]Brewer, J., Jeong, Y., & Husar, A. (2022). Last Mile Connectivity: Addressing the Affordability Frontier. Asian Development Bank. https://www.adb.org/publications/last-mile-connectivity-affordability-frontier

[28]Degezelle, W. (2022). The Open Internet as cornerstone of digitalization. European Commission. https://fpi.ec.europa.eu/news-1/new-report-released-open-internet-opportunities-eu-africa-partnership-2022-10-24_en

towers shape the affordability and accessibility of internet infrastructure. However there is a need for better coordination of investments in this infrastructure to avoid duplication, share the costs and encourage complementary investments. Open Data standards can facilitate sharing of information regarding internet infrastructure and make information more publicly available to investors and researchers alike. Lastly, transparency can address information asymmetries between small internet service providers and larger players.

All the good practices and favourable policies strengthen the internet through enabling community-centred connectivity initiatives included above, align with the Tunis Agenda, which recommended "(h)elping to accelerate the development of domestic financial instruments, including by supporting [...] networking initiatives based on local communities".[29] In addition, Community networks were recognized in 2019 in the UN ECOSOC resolution on the "Assessment of the progress made in the implementation of and follow-up to the outcomes of the World Summit on the Information Society."[30], as well as in the World Telecommunication Development Conference in 2022 (WTDC-22) where Resolution 37 (Rev. Kigali, 2022) resolves to instruct the Director of the Telecommunication Development Bureau (BDT) to "continue supporting Member States, where requested, in developing policy and regulatory frameworks that could expand and support the engagement of telecommunication/ICT complementary access networks and solutions in bridging the digital divide".[31]

3. How can we promote international multistakeholder cooperation on public policy issues that are focused on promoting the development aspects of the Internet?

In order to address the development aspects of the internet, interventions should be based on a robust set of internationally agreed principles rooted in social justice, the public interest and human rights. This is necessary to underpin development and evolving digital governance and collaboration nationally, regionally and internationally, through multistakeholder and multilateral modalities in tandem. These principles should reference and reinforce existing sets of norms, principles and frameworks developed within the UN system as well as through multistakeholder processes, including the São Paulo Multistakeholder Guidelines of 2024.

None of the development dimensions of the internet can be addressed without prioritising key existing gaps and failures such as addressing digital inequality, the gender digital divide and environmental sustainability. Specifically, an active commitment to enabling community-based connectivity solutions, through policy and regulation as well as through innovative financing, and strong measures on confronting the contribution of digitalisation to climate change are paramount. Linked to the former, a strong commitment to the application of the precautionary principle in digital innovation by requiring digital technology developers and companies to conduct environmental and human rights impact assessments as part of a broader process of due diligence that covers all stages of the innovation life cycle/value chain, as well as consultations with local stakeholders, has to be applied evenly at all levels.

For international multistakeholder cooperation to be effective, it is crucial to leverage and strengthen existing processes and structures, ensuring that complementarity and collaboration is inherent in the design, implementation, follow up and monitoring of interventions and response. This should be supported by integration into the Sustainable Development Goals and the World Summit on the Information Society (WSIS) processes and coordinated by the lead UN WSIS agencies (ITU, UNESCO, UNCTAD and UNDP) through a strengthened UN Group on the Information Society (UNGIS) and Internet Governance Forum (IGF).

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[29]https://www.itu.int/net/wsis/docs2/tunis/off/6rev1.html

[30]https://unctad.org/system/files/official-document/ecosoc_res_2023d3_en.pdf

[31]https://www.itu.int/dms_pub/itu-d/opb/tdc/D-TDC-WTDC-2022-PDF-E.pdf

Recommendations

We believe that now is the time that those participating in the ITU-Council Working Group on International Internet-related Public Policy Issues to recognise that community-centred models are not receiving enough attention, and there needs to be more proactive engagement in supporting these complementary solutions that are critical to ensuring the inclusion of marginalised groups such as women and indigenous communities, as well as the most financially disadvantaged. In particular, we recommend:

- Recommit to the multistakeholder processes that underpin efforts toward achieving digital equity and meaningful connectivity
- Ensure that interventions are based on a set of internationally agreed principles rooted in social justice, the public interest and human rights
- Prioritise key existing gaps such as addressing digital inequality, the gender digital divide and environmental sustainability.
- Adopt appropriate licensing and spectrum management frameworks for small social-purpose operators that allows them to effectively contribute to solving the connectivity challenge.
- Put in place national financing mechanisms that support community networks and other complementary connectivity providers by providing small scale startup funding