



January 27, 2010

Mr. Malcolm Johnson
Director
Telecommunications Standardization Bureau
International Telecommunications Union (ITU)
Place des Nations
1211 Geneva 20
Switzerland

RE: WTSA 08 Resolution 76

Dear Mr. Johnson:

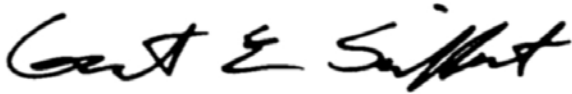
On behalf of our 500 global member companies, I want to express the information and communications technology (ICT) industry's continuing concerns with the ITU's program to document products that allegedly comply with ITU-T Recommendations. Since this idea was first introduced at TSAG in July 2008, TIA and its member companies have expressed growing concern over the direction the ITU is taking in this matter (prior letters attached as a courtesy). While we are sympathetic to the challenges developing countries are facing as they seek to leapfrog from antiquated infrastructure to implement the latest ICTs, we oppose any proposed solutions that could negatively impact trade, delay market access, add costs, and stifle innovation.

Following the October 2009 ITU Council meeting, it was our understanding that the TSB was going to prepare a business plan to establish the real costs, potential liabilities, and benefits of moving forward with the database concept. This business plan would then be presented to TSAG and the next Council meeting. We were therefore surprised to learn that the TSB is moving ahead to launch a database without having completed its business plan or received input from TSAG or Council on the approach. In light of industry having expressed significant concerns about the implications of Resolution 76, we cannot help but feel that the ITU is ignoring industry's views about how this approach actually benefits developing countries; the commercial implications for equipment manufacturers; and the potential ramifications for the ITU.

We urge the ITU to suspend the implementation of the database and conduct a thorough business plan analysis of the costs and potential liabilities of such a program for the ITU and equipment manufacturers. The analysis should balance the costs/liabilities with any measurable benefits developing countries would receive from the database. Specifically, the analysis should examine how complying with specific ITU Recommendations would resolve specific problems encountered by developing countries. Without such a thorough analysis, we do not believe that there can be any legitimate justification for creating such a database.

Lastly, any database that will be used as a reference for compliance with any standard or Recommendation must be accompanied by assurances that the data is accurate, valid, and dependable. The ITU has indicated that it will not assume any legal liability for such a database; however, as the ITU's name is trusted in many parts of the world for its role in international telecommunications, its reputation will be put at risk should the database not be a dependable and accurate source of such information.

Sincerely,

A handwritten signature in black ink, appearing to read "Grant E. Seiffert". The signature is written in a cursive, slightly slanted style.

Grant Seiffert
President