Submission # 98

Name: Lauren Dawes

Organization:GSMA

Country/Region:UK

How would you define the stakeholder community or communities to which you belong?

Private sector

Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?

The GSMA agrees with the six criteria to select indicators for assessing the internet. Our comments below therefore relate to the specific indicators proposed in the consultation.
Contextual Indicators
The Consultation refers to several useful and important contextual indicators. We believe these are appropriate but would suggest adding the Mobile Connectivity Index (MCI) as a reference tool for the ICT development indicators (www.mobileconnectivityindex.com). This Index complements the ITU's ICT Development Index and the WEF Network Readiness Index because the majority of the indicators are mobile-specific and therefore unique to the MCI. These include indicators measuring:
• Network coverage by technology (2G, 3G and 4G)
• Mobile network quality
• Spectrum assignments to mobile operators across countries
• Affordability of a three different mobile tariffs (reflecting different consumption patterns, including entry-level plans)
• Affordability of entry-level internet-enabled mobile devices
• Impact of mobile-specific taxes on the cost of mobile ownership
• Use of social media on mobile (which provides a platform to generate content that local populations need or are interested in)
• Development of mobile applications
• Accessibility of mobile applications based on the languages they are available in
The results of the Index as well as the methodology can be found on our web tool.. We are also sending more detailed analysis along with this consultation response.
Openness indicators
Theme C – Open Markets
With regard to indicator C.2., which captures the legal and regulatory arrangements for spectrum, we suggest metrics should be included to measure the amount of spectrum licensed per operator in three categories: Digital dividend bands (700 or 800), other sub-1GHz bands includes 450, 850 and 900, and above 1 GHz. It is important that operators have access to the right mixture of spectrum below and above 1 GHz to provide high speeds and good coverage. We would recommend weighting the digital dividend bands (i.e. 700 MHz and 800 MHz bands in EMEA and the 600 MHz and 700 MHz bands in the Americas and APAC) more heavily as this is often the only usable

mobile broadband spectrum below 1 GHz given that other bands often still need to be used to support 2G usage.
More widely, we recommend the policy measures below for widening access to affordable mobile services and would encourage the use of indicators to measure them. For more information, please see the GSMA paper on licensing best practice.
1. Licence sufficient spectrum to support high speed mobile broadband

2. The licensed spectrum should comprise coverage (i.e. below 1 GHz) and capacity (i.e capacity) spectrum. It should include the digital dividend band(s) – i.e. 700 MHz and 800 MHz – as this is often the only mobile broadband spectrum below 1 GHz (as 850/900 MHz is often used for 2G)

3. Mobile licences should be technology neutral so spectrum can be refarmed for 4G, otherwise mobile operators can be limited to 2G use only. Regulators who charge to make licences tech-neutral may also discourage mobile broadband use.

4. Licence duration should be at least 20 years to incentivise network investment and there should be a clear process for renewal. Shorter licences discourage heavier network investment especially in rural areas where it takes longer to make a return on investment.

5. Governments should set modest reserve prices and annual fees for spectrum licences - and rely on the market to set prices. High spectrum prices are associated with higher consumer prices and lower quality mobile broadband – so governments should avoid policies which maximise prices.

Accessibility indicators
Theme A – Policy, Legal and Regulatory Framework
A.4. In addition to having a policy and programme to implement universal access to broadband, it is also important that such policies and programmes are grounded in an understanding of the market-specific barriers to internet access, and how these differ by gender and other demographics.
Theme B – Connectivity and Usage
B.1. In addition to having an indicator on international bandwidth per internet user, it would be useful to include a measure of domestic internet bandwidth in order to provide complete measure of capacity. However, we note the difficulty in collecting such data consistently across countries.
We also recommend that measures of actual network quality are included as poor quality can be a significant deterrent to internet use. Possible indicators could include download speeds, upload speeds, latency and jitter.
B.3. We recommend including more elements on usage, in addition to visits to social media sites. These could include: accessing Government services, accessing health and education services, and e-commerce (e.g. number and value of online transactions). GSMA Intelligence recently published a report analysing the frequency and intensity of usage for several mobile-enabled activities across 50 countries.
B.5. If possible, we believe it would be useful to disaggregate the indicator on mobile traffic by gender as usage often varies between men and women.
Theme C - Affordability
C.1. The consultation does not specify a definition of ‘basic mobile handset’. For reference, the Mobile Connectivity Index has an indicator on the cost of an ‘entry-level handset’, which is defined as either a feature phone or a smartphone that provides a user with internet-browsing capability. Such handsets can be identified on the GSMArena website.
C.2. The consultation does not specify a definition of ‘basic mobile broadband connection’. With regard to mobile broadband plans, the entry-level tariff in the Mobile Connectivity Index measures the cost of purchasing a mobile plan that provides at least 100MB of data per month. This is consistent with entry-level data allowances in other mobile price benchmark studies (e.g. the OECD) as well as data on actual usage by users across different countries.
However, it is also important to measure prices of higher-usage baskets in order to ensure that a range of consumption patterns are reflected, and also to take into account a forward-looking view of mobile internet usage, which is rapidly increase year-on-year. For this reason, the Mobile Connectivity Index also includes mobile broadband prices that provide at least 500MB and 1GB of

data per month.
We would also recommend that the affordability indicators are disaggregated by gender, using estimates of male and female GNI per capita published by the UNDP.
Theme E – Local Content and Language
We agree that content generated locally that is available in local languages is essential if people are to realise the full benefits of the internet.
In addition to those proposed, we recommend including indicators measuring the content available on mobile phones, for example mobile applications. The Mobile Connectivity Index includes indicators measuring the number of mobile applications developed across countries as well as the number available in local languages.
Theme F – Capabilities/Competencies
This is an important area where evidence is currently lacking, in particular indicators that capture the extent to which users are able to engage with digital technologies and the internet.
We note that the ITU currently collects indicators that measure certain skills of ICT users. These skills include copying or moving a file or folder; using copy and paste tools; sending emails with attached files; using basic arithmetic formulae in a spreadsheet; connecting and installing new devices; finding, downloading, installing and configuring software; creating electronic presentations; transferring files, and; writing a computer programme.
While useful, this indicator does not capture the skills necessary to engage with mobile technology, which is now the primary channel for accessing the internet in developing countries. We would therefore propose the collection of data that measures skills that are relevant to mobile internet usage. These could include measuring the proportion of mobile internet users that can: install an application on a mobile device; use a messaging service to communicate with friends or family; search for information on a mobile device; use a social network; upload content to website or via an application; change the settings of a mobile device.
We would also encourage, to the extent possible, that the indicators under F.3. are disaggregated by gender and by geography (urban/rural) as mobile digital literacy can vary depending on these segments.
Multi-stakeholder Participation indicators
Theme C – International Internet Governance
The GSMA and its members believe that the multi-stakeholder model for internet governance and decision-making should be preserved and allowed to evolve. Internet governance should not be managed through a single institution or mechanism, but be able to address a wide range of issues and challenges relevant to different stakeholders more flexibly than traditional government and intergovernmental mechanisms.
The internet should be secure, stable, trustworthy and interoperable, and no single institution or organisation can or should manage it. Collaborative, diverse and inclusive models of internet governance decision-making are requisite to participation by the appropriate stakeholders. The decentralised development of the internet should continue, without being controlled by any particular business model or regulatory approach.
Some questions warrant a different approach at the local, national, regional or global level. An effective and efficient multi-stakeholder model ensures that the stakeholders, within their respective roles, can participate in the consensus-building process for any specific issue.
Technical aspects related to the management and development of internet networks and architecture should be addressed through standards bodies, the Internet Engineering Task Force (IETF) and the Internet Architecture Board (IAB) and other fora. Economic and transactional issues such as internet interconnection charges are best left to commercial negotiation, consistent with commercial law and regulatory regimes.
Multi-stakeholder participation in multilateral discussions on Internet governance at the UN, for example, continues to be challenging. Indication of all stakeholder groups on national delegation is a solid mechanism for measuring participation. All stakeholder participation in ICANN is and should only be one specific indicator among many others. It is important to not just measure ICANN multi-stakeholder participation, but also WSIS Forum, Internet governance forum, IETF, ITU and other global meetings. The stakeholder make up of each of these meetings, though each meeting has a different focus, can indicate regional trends and longitudinal trends as well. These trends could provide keys to where certain stakeholder groups are and are not participating and where those groups may participate.

Cross-Cutting indicators
With regard to Group A indicators for Gender, it is important that gender disaggregation is applied in conjunction with other demographic splits, in particular urban/rural and age categories. GSMA and other research has found that the gender gap is widest in rural areas and can be significantly wider amongst certain age groups.
A.2. We recommend adding an indicator that assesses understanding and awareness of internet by gender, as they are often different between men and women. We would also suggest including an indicator to measure mobile phone or smartphone ownership by gender given that mobile is the first and primary means of access the internet for the majority of the world's population and there is a substantial gender gap in the ownership of internet-enabled phones (particularly smartphones).
A.6. We suggest adding an indicator assessing whether information about reproductive and sexual health is available in local languages.
B.3. We suggest disaggregating this indicator by gender, as to address the gender gap in mobile ownership and use in the future, it is important to encourage equitable access amongst younger age groups.
D.5. We suggest disaggregating this indicator by gender as nervousness about internet use can be a disproportionate barrier for women.

Are there any suggestions that you wish to make in respect of the proposed themes, questions and indicators which are included in the framework as it stands?

We have no comments.

What sources and means of verification would you recommend, from your experience, in relation to any of the questions and indicators that have been proposed?

As the consultation highlights, there is a significant digital divide with respect to gender and so it is critical that robust indicators are developed to measure and track both the gender gap and its causes over time. Given the difficulties in measuring the gender gap, we believe there is merit in considering a range of sources to ensure that estimates can be validated. We would propose the following sources as a starting point:
GSMA Mobile Gender Gap Report 2018
This includes information on:
• Barriers to mobile ownership and mobile internet use (for mobile users who are aware of mobile internet but do not use it)
• Awareness of mobile internet
• Size of the gender gap in mobile ownership and mobile internet
• Size of gender gap by urban/rural
GSMA: Bridging the gender gap: Mobile access and usage in low- and middle-income countries, 2015
This includes information on barriers to mobile ownership and use.
Facebook Audience Insights
This provides information on the gender gap in social media (for Facebook specifically). We have found that in markets where Facebook is the dominant social media platform, it is a very strong proxy for the gender gap in internet use when survey data is not available.