ATIS INTERACTION WITH THE ITU

Interaction with the International Telecommunications Union Telecommunications Standardization Sector (ITU-T) may be necessary in connection with the work of an ATIS Forum/Committee. These activities include preparing transmittals through national coordination bodies to international meetings, receiving external positions and developing comments, and participating in external meetings as a representative of an ATIS Forum/Committee.

Section 1 below provides procedures for communicating with the U.S. ITAC-T Study Groups regarding technical contributions into the ITU-T. Section 2 is concerned with procedures to establish and conduct liaisons with ITU-T.

A.1 INTERACTION WITH THE U.S. ITAC-T STUDY GROUPS

A.1.1 GENERAL

The U.S. telecommunications industry traditionally has been a very active contributor to the development of international standards in the ITU-T. It is in the interests of the U.S. to continue this work.

The U.S. contributions and participation in ITU-T are channeled through ITAC-T, a national organization referred to as the International Telecommunications Advisory Committee – Telecommunications administered by the U.S. Department of State. ITAC-T has several subordinate ITAC-T Study Groups which review and approve contributions to ITU-T Study Group meetings. The current subject areas and relevant ITU-T Study Groups assigned to each ITAC-T Study Group are:

<table>
<thead>
<tr>
<th>U.S. ITAC-T Study Group</th>
<th>Assigned Subject Area</th>
<th>Relevant ITU-T Study Groups</th>
</tr>
</thead>
<tbody>
<tr>
<td>A</td>
<td>Telephony Services</td>
<td>2, 3, 12</td>
</tr>
<tr>
<td>B</td>
<td>Network Infrastructure</td>
<td>4, 6, 10, 11, 13, 15</td>
</tr>
<tr>
<td>D</td>
<td>Data Communications</td>
<td>5, 7, 8, 9, 16</td>
</tr>
</tbody>
</table>

Contributions to ITU-T are of two types: individual-member contributions from organizations that have ITU-T (“small m”) membership, and “Member State” contributions that are developed by national standards organizations or government agencies, for our purposes the U.S Department of State. This flow of contributions is illustrated in the following Figure.
A private organization is encouraged to submit a proposed contribution to the work of ITU-T through the appropriate ATIS Forum/Committee when it can be identified. This will help facilitate the establishment of a unified U.S. position so that it may be approved by the ITAC-T Study Group as a U.S. Contribution.

Note: State Department procedures do not establish “U.S.” positions for ITU-T Rapporteurs’ meetings. Rather, documents are normally submitted as “individual-member contributions.” Nonetheless, the Chairs of the ITAC-T Study Groups retain certain responsibilities regarding such contributions. See “Guidelines for the U.S. Preparatory Process for the ITU Telecommunication Standardization Sector,” published by the Department of State, for those procedures.

A.1.2 Development of Contributions Within an ATIS Forum/Committee

Each ATIS Forum/Committee is expected to develop technical contributions and positions within its scope and range of interest to ITU-T study questions. Contributions developed in this manner are approved by the membership of the ATIS Forum/Committee. Formal voting or letter ballots are not required, and generally the process should be to obtain consensus. Proposed contributions approved by the ATIS Forum/Committee are then submitted by the ATIS Forum/Committee leader to the appropriate ITAC-T Study Group for its review and approval.

A.1.3 Citing ATIS Forum/Committee Review of Individual-Member Contributions to ITU-T Meetings

Under certain circumstances, participating organizations may be allowed to identify their ITU-T contributions as having received technical review in an ATIS Forum/Committee or subgroup.

A.1.3.1 Contributions to ITU-T Rapporteur’s Meetings

As a matter of policy, State Department procedures do not establish “USA” positions for ITU-T Rapporteurs’ meetings; documents are normally submitted as “individual-member contributions.” However, to reduce the possibility that one’s contribution will be weakened by adverse comments from other U.S. participants, organizations should seek to discuss them with other interested parties in the U.S.A. before the Rapporteur’s meeting.

The role of an ATIS Forum/Committee is to provide the venue for such a discussion. Organizations present their proposed contributions to the appropriate ATIS Forum/Committee, just as they would if it were intended as a contribution to a full Study Group meeting. If the group agrees that the document should be a contribution to the Rapporteur’s meeting, they “endorse” it and the contributing organization is allowed to cite that endorsement with an attribution on the contribution. This also enhances the credibility of the contribution, because it clarifies to other participants at the Rapporteur’s meeting the level of technical support it has in the U.S.

The following guidelines apply:

- The attribution reads either “This document represents a consensus view of the ATIS [name of Forum/Committee]” or “This document represents a consensus view of Working Group [WG].”
- Permission to use the attribution is only granted for Rapporteur’s meetings; it is not used on documents being submitted to U.S. ITAC-T Study Groups as proposed U.S. positions, even if they have been discussed and have achieved consensus in an interim meeting of a subgroup of an ATIS Forum or Committee.
- Once the attribution has been authorized, the contributing organization retains the decision as to whether or not to use it. If they decide to change the document after the discussion, they cannot, of course, use the attribution.
- The attribution is placed on the bottom of the first page of the contribution, immediately below the Contact information.
A.1.3.2 Contributions Under Review by U.S. ITAC by Correspondence

Companies sometimes prepare contributions that they wish to submit to ITU-T Study Groups as individual-member contributions, rather than as “USA” positions. An ATIS Forum/Committee or subgroup discusses the paper, makes comments, and agrees that it should be submitted as an individual-member contribution, but does not take ownership of the paper and “approve” it. Sometimes, papers do not achieve enough support in an ATIS Forum/Committee or subgroup to be recommended to be “USA” positions, but the ATIS Forum/Committee or subgroup agrees to recommend that the document be submitted as an individual-member contribution.

When the appropriate U.S. ITAC-T Study Group conducts a face-to-face meeting to review proposed contributions, these facts – especially that the document has been reviewed in an ATIS Forum/Committee or subgroup – can be established by comments from the floor. However, the U.S. ITAC-T Study Groups sometimes work by correspondence. In this case, the ATIS Forum/Committee or subgroup may allow the use of an attribution in the cover letter to the U.S. ITAC-T SG members to clarify the status of the document.

The following guidelines apply:

- The attribution reads “ATIS Forum, Committee, or Subcommittee [name] has reviewed Document [identifying number] and has agreed that it should be submitted as an individual-member contribution.”
- Once the attribution has been authorized, the contributing organization retains the decision as to whether or not to use it. If they decide to change the document after the discussion, they cannot, of course, use the attribution.
- The attribution is placed in the cover letter to the U.S. ITAC-T Study Group.

A.1.4 Proposed Contributions of Concern to More Than One ATIS Forum/Committee

An ATIS Forum, Committee or Subcommittee may judge that a proposed contribution to a U.S. ITAC-T Study Group warrants review by other ATIS Forums/Committees.

In such cases, the originating ATIS Forum, Committee, or Subcommittee leader should post the proposed contribution to its Forum/Committee web site and send an email request for review and comments to the other relevant ATIS Forum(s)/Committee(s). This is especially relevant when the contribution is generated in one ATIS Forum/Committee as part of a program that is being managed through another ATIS Forum/Committee. If comments are received, the leader of the ATIS Forum/Committee that approved the contribution should arrange to have them presented to the appropriate ITAC-T Study Group at the same time as the proposed contribution.

In rare cases, it may be deemed necessary to receive ATIS Board of Director review of the proposed contribution. In these cases, the originating ATIS Forum/Committee leader should transmit the document to the Advisory and Liaison Committee of the ATIS Board of Directors via the ATIS General Counsel.

A.2 Written Liaisons to ITU-T

ITU-T has a material interest in telecommunications and the membership of ATIS has an interest in global telecommunications standards. As such, liaison with ITU-T may occur in the normal course of ATIS Forum/Committee activities in the preparation of voluntary standards.

Exchange of technical documents among standardization organizations is encouraged. For indication of the status of such documents they should be labeled into three categories:

- **Preliminary** The initial concept or idea has been discussed in the working entity, but text has not been developed or has not been agreed to by the working entity.
- **Maturing** The document, while in development, contains incomplete areas but reflects a general consensus on the concept. Future changes and additions are expected.
- **Stable** The document contains relatively stable text and addresses all necessary areas and reflects a consensus agreement of the entity; substantive changes are not expected within the entity.

A.2.1 Authorizing a Written Liaison

A written liaison with ITU-T may be initiated by an ATIS Forum/Committee. For technical or non-policy liaisons with non-governmental and non-regulatory organizations on subjects either in the mission and scope of an ATIS Forum/Committee or where a lead ATIS Forum/Committee has been designated, approval of the liaison request is by that ATIS Forum/Committee membership. See also Section 12 of the Operating Procedures for ATIS Forums and Committees.
When there is a need for more than one ATIS Forum/Committee to communicate with an external organization, one of the ATIS Forums/Committees should be designated with lead responsibility. The designated ATIS Forum/Committee shall ensure that contributions are developed and circulated to other interested ATIS Forums/Committees and forwarded to the appropriate organization in a timely manner. Conflicting documents on the same topic must not be transmitted by different ATIS Forums/Committees and suspected overlapping submissions are to be resolved by the involved ATIS Forums/Committees.

Any material directed to an external standards committee should normally have a transmittal letter signed by an appropriate ATIS Forum/Committee leader on ATIS letterhead.

A.2.2 Procedure for Formulating and Transmitting Written Liaisons to ITU-T

The responsible ATIS Forum/Committee is expected to develop advanced plans for external documentation work. This will allow candidate contributions to be reviewed in detail by concerned ATIS Forum/Committee membership prior to transmission to the external organization.

The ATIS Forum/Committee may authorize a delay of up to ten days to afford a participant with direct and material interest the opportunity to more thoroughly review a proposed distribution of documents to external organizations.

When such a delay is authorized, the participant(s) are required to formally respond to the ATIS Forum/Committee leader within the review period if they have specific technical objections. If, in the opinion of the ATIS Forum/Committee leader, the concerns are of a reasonable technical nature, that leader will attempt to resolve the concerns. If the concerns presented are not resolved, the leader will hold the document for further review and advise the ATIS Forum/Committee. If the participant(s) do not respond with specific technical objections, or if, in the opinion of the leader, the objections are not appropriate to hold the contribution, the contribution is to be forwarded as recommended by the ATIS Forum/Committee. If no concerns are received by the leader during the review period, the contribution should be forwarded as recommended by the ATIS Forum/Committee.

A.2.3 ITU-T and U.S. ITAC-T Requirements for Direct Correspondence with ITU-T Study Groups

ITU-T Recommendation A.6 permits approved and draft documents to be exchanged between qualified Standards Development Organizations (SDOs) and ITU-T Study Groups (SGs). It is implied that the documents might be adopted, in whole or in part, into the products (Recommendations, Supplements, etc.) of ITU-T. ATIS has been recognized by the Director of the ITU-T Telecommunication Standardization Bureau (TSB) as a qualified SDO.

Documents that are exchanged in this manner are not contributions. ITU-T procedures require that they are sent directly to the appropriate Study Group Chairperson who, if the documents are considered useful, will authorize them to be distributed as Temporary Documents at a Study Group or Rapporteur’s meeting. To comply with U.S. Department of State guidelines, documents exchanged in this manner must never contain any wording that could reasonably be construed as a proposal that the material be adopted or a suggestion that it is for consideration. Such proposals and suggestions, which might be sent in parallel to an A.6-compliant submission, must be submitted in the normal contribution process described in Section 1.

Documents that are sent to the ITU-T in this manner may be approved documents, drafts, or works in progress. They may be American National Standards, ATIS Standards, or ATIS Forum/Committee Technical Reports. They also may be large or small excerpts from qualified documents.

For compliance with U.S. Department of State guidelines, documents to be sent to the ITU-T under Recommendation A.6 must be sent first to the appropriate U.S. ITAC-T Study Group for information and the leader of that U.S. ITAC-T SG must acknowledge that the document has been noted before it may be sent to the ITU-T.

There are four steps to be completed to submit documents to ITU-T Study Group Chairmen under Recommendation A.6.

1. Prepare the transmittal in four parts: a transmittal letter to the appropriate ITAC-T SG Chair, a liaison to the appropriate ITU-T SG Chairman, a draft of the Temporary Document that the Chairman will send to the TSB, and the document itself (if it is not imbedded in the ITU-T Temporary Document). The liaison to
the ITU-T SG Chairman must indicate the ATIS Forum/Committee sending the document, the degree of
stability of the text (i.e., preliminary, mature, stable), proposed date of adoption, etc., and the status of the
document (e.g., working document, draft, interim or approved standard).
2. Obtain approval of the ATIS Forum/Committee, as described in clauses 2.1 and 2.2.
3. Send the package to the Chair of the appropriate ITAC-T SG.
4. After the submission has been noted by the U.S. process, add a sentence to the cover letter indicating that
it has been noted by the U.S. process and send it to the appropriate ITU-T SG Chair. As suggested in
ITU-T Recommendation A.2, it is always good practice to send courtesy copies to the appropriate
Councilor, Working Party Chair, and appropriate Rapporteurs for their use in planning the meeting.