



intug | empowering business communications

## INTUG Response to Action Items from CISP-52, 9-10 December 2014

INTUG is a global association of business users of communications. With members and contacts in all five continents, INTUG uses this reach to actively promote professional customers' interests at the international level. INTUG's long-term focus is to bring down all barriers companies and public institutions face when developing their ICT strategies. For more information, see INTUG's web site at [www.intug.org](http://www.intug.org).

INTUG is pleased to provide comments on the following Decision Items from CISP-52:

- Digital Economy Outlook: the Internet of Things
- International Mobile Roaming

### **Item 4: Digital Economy Outlook - DSTI/ICCP/CISP(2014)15/CHAP2 and /CHAP5**

INTUG wishes to emphasize the criticality of the Internet of Things to business users, as much of the innovation in ICT comes from new on-line and mobile business processes. This is especially true now, as more and more consumer units, cases, devices and pieces of equipment have embedded wireless transceivers in end user business processes, as well as in the extended supply chain. It is essential therefore that the Internet of Things allows flexible mobile access, which is not limited to specific mobile operators for the access network. Spectrum sharing and harmonization and open access are crucial for cross border online M2M business applications.

### **Item 8: Monitoring the Council Recommendation on International Mobile Roaming - DSTI/ICCP/CISP(2014)6**

INTUG welcomes OECD's continuing prioritization of action to eliminate this longstanding obstacle to global economic growth. Viewed purely from a business user perspective, any continuation of so-called "roaming" charges is a roadblock for the digital economy. It is an anachronism in the modern multinational borderless business world. While regulation, especially in the EU, has reduced the economic damage done by roaming charges, further MNO maneuverings and regulation are still something of a "shuffling the deck chairs on the Titanic" activity. In a converged world, where users are increasingly unaware of connection mechanism being used, especially if the user is an object not a person, it is completely unacceptable if one access mechanism carries a cost penalty simply based on its country of origin and/or location. This is demonstrated by the recent Apple initiatives towards a "soft-SIM" approach. Industry must find a way collectively to completely eliminate roaming as a relic of history peculiar to the early stages of mobile communications. INTUG recommends that the report states clearly and quantitatively the continuing damage inflicted on the global economy by any international roaming charges.

---

Nothing in this submission is confidential and the contents can be considered to be in the public domain. It is being made available on the INTUG web site at [www.intug.org](http://www.intug.org)

Comments and queries should be addressed to: **Nick White**, Executive Vice President  
International Telecommunications Users Group (INTUG)

Email: [nick.white@intug.org](mailto:nick.white@intug.org) Tel: +44 20 8647 4858 Mobile: +44 77 1009 7638