

GSMA COMMENTS ON THE ZERO DRAFT

We welcome the text of the Zero Draft, which clearly recognises the value of multistakeholder collaboration and provides a solid foundation for collective action towards an inclusive, resilient, and secure digital future.

THE DIGITAL DIVIDE

We welcome the recognition of persistent digital divides and barriers to internet adoption in the Zero Draft. With mobile broadband networks covering approximately 96% of the global population, we know that the overwhelming majority of unconnected individuals – 3.1 billion people – remain offline despite having coverage. As well as addressing the barriers that keep these people from using the internet, which include device affordability, digital literacy, and a lack of relevant content, efforts must also continue to reach the 300 million people living in areas not yet served by broadband infrastructure.

Recognising the difference in the scale of these distinct challenges, paragraphs 12 and 18 should explicitly distinguish between efforts to extend network coverage and efforts to encourage internet adoption.

Paragraph 12	
Original text:	Original: Bridging them requires measures concerned not just with connectivity but with the affordability of networks and devices, the availability of relevant content and services in local languages, and the development of digital skills, literacy and capabilities.
Proposed text	Proposed text: While B bridging them requires measures to extend coverage it must also address barriers to usage such as ; concerned not just with connectivity but with the affordability of networks and devices, the availability of relevant content and services in local languages, and the development of digital skills, literacy and capabilities.

Paragraph 18	
Original text:	A third of the world's population still does not make use of the Internet, while many people with access make little use of it for reasons that include lack of affordability, limited content including content in locally relevant languages, and limited digital skills. Strengthened international cooperation and enabling policy environments are required to address gaps in access and affordability, digital skills, financing and technological resources.
Proposed text	A third of the world's population still does not make use of the Internet, despite many of the unconnected people living in an area served by broadband infrastructure. At the same time, while many people with access make little use of it for reasons that include lack of affordability, limited content including content in locally relevant languages, and limited digital skills. Strengthened international cooperation and enabling policy environments are required to address gaps in access both the coverage and usage gaps, including in areas related to and affordability, digital skills, financing and technological resources.

The Zero Draft highlights affordability as a key barrier to digital inclusion. While paragraph 29 notes the need to ensure affordable broadband subscriptions, it should also seek to improve the affordability of entry-level internet-enabled devices. We also suggest adding clarifying text in order to avoid potential misinterpretation during implementation that might inadvertently lead to unsustainable regulation or underinvestment.

Paragraph 29	
Original text:	We are committed to achieving affordability of entry-level broadband subscription costs that are accessible to the widest section of the population.
Proposed text	We are committed to achieving affordability of entry-level broadband subscriptions costs and internet-enabled devices so that they are accessible to the widest section of the population, population, taking into account the need to ensure sustainable investment and continued expansion of high-quality connectivity.

We strongly support the robust language in paragraphs 24–26 highlighting persistent gender digital divides, the digital inclusion needs of persons with disabilities, and the challenges faced by other disadvantaged or vulnerable groups. Addressing these divides is essential to ensuring that no one is left behind and to promoting an inclusive, people-centred Information Society.

However, with women and girls disproportionately affected by the usage gap, paragraph 13 on the digital gender divide should also recognise the unique barriers to usage that women and girls face, such as restrictive social norms and gaps in literacy and digital skills.

Paragraph 13	
Original text:	We reaffirm that gender equality and the empowerment of all women and girls, and their full, equal and meaningful participation in the digital space, are essential to close the gender digital divide and advance sustainable development.
Proposed text	We reaffirm that gender equality and the empowerment of all women and girls, and their full, equal and meaningful participation in the digital space, are essential to close the gender digital divide and advance sustainable development. Efforts to close the gender digital divide must address the unique barriers to usage that women and girls face such as restrictive social norms and a lack of literacy and digital skills.

THE ENABLING ENVIRONMENT

We welcome the recognition in paragraphs 55–57 of the critical role that a positive enabling environment plays in fostering investment, innovation, technological development, and the bridging of

digital divides. However, following the Draghi Report, we note that the economic model underpinning the internet value chain is coming under increasing strain from online services providers which depend on network owners’ investments ‘to a massive extent but do not contribute to financing them’.¹

We therefore suggest adding text to paragraph 57 which recognises the need to ensure a resilient and sustainable digital economy.

Paragraph 57	
Original text:	We commit to continuing to identify and implement best and emerging practices for the establishment and functioning of education, innovation and investment frameworks for information and communications technologies.
Proposed text	We commit to continuing to identify and implement best and emerging practices for the establishment and functioning of education, innovation and investment frameworks for information and communications technologies, recognising that the evolution of the internet value chain is putting pressure on connectivity providers’ ability to deploy next generation network infrastructure.

Internet governance

We support the reaffirmation of the working definition of Internet governance in the Tunis Agenda regarding its multistakeholder nature as noted in paragraph 103 and the call for greater participation and engagement of all stakeholders in Internet governance discussions in paragraph 105. We support proposals to make the IGF a permanent UN forum, to enhance its working modalities, and to strengthen its Secretariat (paragraphs 115–118). At the same time, we note that the IGF is currently presented with a focus primarily on Internet governance matters. Given its evolving role, future drafts may benefit from clarifying how the IGF can continue to facilitate discussion not only on Internet governance but also on related digital policy issues.

¹ Mario Draghi, *The Future of European Competitiveness: A Competitiveness Strategy for Europe* (September 2024), p. 36