



Intervention for the April 24, 2024 United Nations Stakeholder Session¹

CCIA's Remarks on the Global Digital Compact Zero Draft

Thank you, Ambassador Milambo.

I am Amir Nasr from the Computer & Communications Industry Association, an international nonprofit membership organization representing companies in the computer, internet, information technology, and telecommunications industries.

Overall, the zero draft of the Global Digital Compact² is a good start to a potentially very useful set of principles, with many positive elements that we support. Commitments to implement the concept of Data Free Flow with Trust; to bridge the digital divide; to uphold freedom of expression and the open internet; to promote coordination and interoperability across emerging AI governance frameworks; and to leverage emerging technologies to achieve the Sustainable Development Goals are all areas industry supports.

However, there are certain pieces of this zero draft that we think could be improved.

On digital public infrastructure and digital public goods at Cluster 3, we appreciate the acknowledgement that each society will have differing needs and goals. The reference to safeguards for private investment is helpful. But the bigger problem remains: the lack of any clear definition of these terms means that these are not helpful principles to provide meaningful guidance to either governments or the private sector; and could actually be used to justify policies that were neither expected nor justified.

The proposed underlying commitment to promote interoperability with the goal of furthering DPI remains problematic, as it suggests a proactive advocacy of the proliferation of such frameworks in contexts where it may instead stifle private investment and public-private partnerships to improve infrastructure.

Similarly, the reference to “interoperable data exchanges to facilitate access to data” at provision 37 is not defined, also undermining its utility as a principle. Furthermore, this vagueness could potentially span cases from the purely benign to the extremely burdensome.

We would also caution against creating a new bureaucracy through this initiative that could lead to conflicting implementation of goals sought by the GDC, particularly in areas where definitions are still not agreed upon at an international level and vary wildly depending on the jurisdiction such as “safety” and “freedom of expression.” While sharing best practices can be useful, collaboration of developing interventions, such as at provision 28(c) could necessitate

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https://www.un.org/techenvoy/sites/www.un.org.techenvoy/files/240416_GDC_Co-Facs_Invitation_Letter_MSH_24_April.pdf.

² https://www.un.org/techenvoy/sites/www.un.org.techenvoy/files/Global_Digital_Compact_Zero_Draft.pdf.



picking an approach that many members might actually oppose, for example based on a particular interpretation of what “safety” or “free expression” means.

Finally, we would caution against the prescriptive approach taken in paragraphs 61-65. Duplication of national and other multilateral efforts in the field of emerging technology governance could create complex overlapping frameworks that hinder the expansion of digital services globally, which could ultimately undermine their ability to achieve the SDGs by 2030.

Thank you.