



July 2, 2026

To: ITU-T Member Delegations

RE: SG 3, [Cost Contribution Guidelines](#): Supporting an Open, Innovative, and Sustainable Internet Ecosystem

The undersigned organizations represent businesses and other key stakeholders from across the international internet ecosystem. Collectively, our organizations make extensive contributions to improve and expand connectivity across the globe, including by investing billions of dollars each year in infrastructure, including submarine cables, data centers and caches, and local peering arrangements that significantly improve service quality and reduce the burden on local networks. These investments are complemented by technical assistance, capacity building, collaborative initiatives, and other substantial investments in services that work alongside telecommunications networks to connect users, expand access to digital opportunities, and support economic growth in both developed and developing economies.

As discussions continue within ITU-T and at the member state level regarding the relationship between telecommunications networks and digital services, we respectfully encourage Member States to support policies that preserve the open, collaborative, and market-driven foundations that have enabled the internet to become one of the most successful engines of economic development and connectivity.

The internet's success has been built on a simple and effective economic model. Internet users pay their internet access and telecom providers with the baseline expectation that they can reach all legal internet content without prejudice, while each participant in the ecosystem pays for its own connectivity rather than for the transmission of specific traffic flows. This approach has enabled a global, interconnected network of networks to grow and innovate without imposing tolls on internet traffic. This collaborative model is reflected in global best practices for interconnection, where approximately 99.5% of arrangements are established through mutual agreement without a written contract, a framework that has consistently supported network expansion and reduced costs. Consideration of proposals that would require additional payments tied to data traffic would depart from this longstanding framework and introduce new costs into an ecosystem that has supported decades of investment and growth.

Mandatory traffic-based payment mechanisms risk increasing costs for consumers. End users already pay for internet access, while online services invest heavily in the infrastructure needed to reach those users. Online services do not themselves “push” traffic; rather, users explicitly request content to be delivered by their provider. Consequently, mandating traffic-based payment mechanisms leads to double-charging, levying fees on digital services that end users have already purchased. Additional

charges linked to the traffic flows would increase costs across the internet economy, reducing affordability and limiting access to the services that drive demand for broadband connectivity.

Mandatory traffic-based payment mechanisms may also undermine competition and investment.

While these financial burdens would negatively impact companies of all sizes, they pose a particularly acute threat to small businesses and start-ups seeking to reach new users and markets. If messaging and digital platforms are forced to pass down these hidden costs, companies, especially small- and medium-sized businesses, would have to fundamentally change how they interact with their customers. Such measures could make it more difficult for innovative services to grow while diverting resources away from investments in infrastructure and connectivity.

There is evidence that mandatory payment mechanisms lead suppliers to forego connectivity investments in target markets. These fees risk discouraging user participation, limiting the vibrant online ecosystem that enables the sharing of user-generated content. While this can keep transport prices high for incumbents, those costs are passed on to consumers, incentivizing content and application providers (CAPs) to move to more competitive markets, depriving the market of innovative suppliers.

There is little evidence that mandatory traffic-based payment mechanisms are necessary to support network investment. The continued growth of the internet has been enabled by commercial negotiations and voluntary investment across the digital economy, and no broadly adopted regime has demonstrated that such mechanisms are needed to sustain investment or deliver better outcomes for consumers. CAPs already make significant infrastructure investments, often in partnership with telecommunications operators. These investments include data centers, content delivery networks, caches, and local peering arrangements that reduce the burden on ISP networks while improving end-user experience through lower latency and higher-quality service. For example, cloud service providers and content delivery networks help ISPs optimize network performance by delivering content more efficiently and at faster, more reliable speeds.

Traditional telephony charging models are not well-suited to the architecture of the modern internet. Unlike telephone networks, where charges could be associated with individual calls between clearly identified endpoints, internet traffic reflects billions of interactions among users and services across a highly distributed global network. Attempting to replicate telephony-era charging models would create significant complexity and uncertainty while providing little clarity regarding how costs should be allocated among the many participants involved in delivering online services.

Proposals that single out particular categories of services for mandatory payments raise concerns regarding longstanding principles of non-discriminatory access. Telecommunications networks have historically succeeded by providing access to users and services on an open and non-discriminatory basis. Preserving these principles remains essential to maintaining an innovative and globally connected internet that benefits consumers, businesses, and network operators alike.

We respectfully encourage Member Delegations to pursue evidence-based policies that promote investment and collaboration across the digital economy and preserve the conditions that have enabled the internet to remain an open and globally connected platform for economic growth, digital transformation, and affordable connectivity.

Sincerely,

Aliança pela Infraestrutura Digital e Internet Aberta

Alianza por la Infraestructura Digital e Internet Abierta para América Latina y el Caribe ([DIG.IA-LAC](#))

Association for Competitive Technology (ACT)

Câmara Brasileira da Economia Digital

Computer & Communications Industry Association

Consumer Technology Association (CTA)

Information Technology Industry Council (ITI)

Internet Infrastructure Coalition (i2Coalition)

Latin American Internet Association (ALAI)

Motion Picture Association, Inc.

National Foreign Trade Council (NFTC)

Software & Information Industry Association (SIIA)