

Question 1: What actions have been undertaken or to be undertaken by governments in relations to each of the international Internet-related public policy issues identified in Annex 1 to Resolution 1305 (adopted by Council 2009 at the seventh Plenary Meeting)?” **Annex 1** gives the following issues:

- Multilingualization of the Internet Including Internationalized (multilingual) Domain Names
- International Internet Connectivity
- International public policy issues pertaining to the Internet and the management of Internet resources, including domain names and addresses
- The security, safety, continuity, sustainability, and robustness of the Internet
- Combating Cybercrime
- Dealing effectively with spam
- Issues pertaining to the use and misuse of the Internet
- Availability, affordability, reliability, and quality of service, especially in the developing world
- Contributing to capacity building for Internet governance in developing countries
- Developmental aspects of the Internet
- Respect for privacy and the protection of personal information and data
- Protecting children and young people from abuse and exploitation)

Answer 1: The Bulgarian government has undertaken long time before anyone at the ITU would even think about these issues a policy, which resulted in unprecedented (and almost not followed in other countries) growth of Internet penetration, affordability, and quality of the service. Information document № 7, [provided](#) by the MTITC to the ITU Plenipotentiary meeting in Guadalajara, Mexico in 2010 speaks for itself.

Bulgaria has waived any licensing or registration regime for the Internet service providers since 1999. Under the Law for Electronic Services, the state does not control or deals with the Internet names and addresses (though, one must point out, it still deals with the Internet numbers – a service, which is largely known as ENUM).

ISOC-Bulgaria, having been part of the last 14 years of negotiations, and sometimes legal arguments between all interested parties in the country, believes that such a policy has proven as a very successful one for the general development of the Internet sector in the country.

Concrete comments on some of the items in Annex 1:

- Multilingualization of the Internet Including Internationalized (multilingual) Domain Names

The government has been part of the ICANN IDN Fast Track process; thanks partly to the unsuccessful bid to obtain Cyrillic IDN ccTLD for Bulgaria, the ICANN policy was changed, thus giving Bulgaria, Greece,

and other interested countries, to appeal for review of the first objection. Furthermore, the ICANN IDN program has proven to be working both in the Fast Track, and in the new gTLD part.

- International Internet Connectivity

Thanks to the lack of regulation or licensing, or even loose registration regime, Internet Service Providers were able to compete with each other, and reach levels of prices, which make the Internet in the country accessible and affordable for everyone. Bulgaria rates # 1 in the EU in fast speed Internet (speeds above 100 Mbps), as recognized by EU Commissioner Reding.

- International public policy issues pertaining to the Internet and the management of Internet resources, including domain names and addresses

As mentioned above, Bulgaria by law does not license, register, control, or interfere in anyway with the domain names and the Internet addresses, and that's a decision that has been supported by governments and parliaments on a constant base since 1999. The Bulgarian example shows that with less regulation, there's more competition, better choices for the users, and the access to the Internet is both affordable, and very fast. We would encourage other governments to study and use this example.

- The security, safety, continuity, sustainability, and robustness of the Internet

The security is usually part of the work responsibilities of the Internet service providers, the telecom operators, and the users. The state has ratified the Budapest Cybercrime convention, but it has also engaged with the International Cybercrime Academy, based in Sofia, and other entities, in order to secure the Internet to a maximum degree possible, with the limited resources available with the governmental budget.

- Combating Cybercrime

As mention, the Budapest convention is ratified, and the state works in close coordination and cooperation with law-enforcement agencies, ENISA, and other relevant bodies. A Bulgarian MEP, Ivailo Kalfin, was rapporteur to the European Parliament on Cybersecurity.

- Dealing effectively with spam

This is purely into the realm of the private business. The government deals with incoming spam, at the front routers / gateways, and makes sure that spam does not reach the mailbox of users. Historically, commercial operators have proven quite good in dealing effectively with spam.

- Issues pertaining to the use and misuse of the Internet

We don't see such an engagement by the government – if the Internet is “misused”, whatever this term means, there are ways to deal with the perpetrators.

- Availability, affordability, reliability, and quality of service, especially in the developing world

This is the topic, discussed couple of times above, where Bulgaria indeed makes a difference, and its experience should be widely shared, including with the help of the ITU.

- Contributing to capacity building for Internet governance in developing countries

We are not sure what this means – Internet governance does not need capacity building and contributions, it is more into the line of state providing good conditions for competition.

- Developmental aspects of the Internet

Likewise, we are not sure what it means.

- Respect for privacy and the protection of personal information and data

At ISOC-Bulgaria we care deeply about privacy and data protection. The latest revelation of Mr. Snowden have shown that governmental agencies tend to enhance the scope of their monitoring functions – something we have faced in Bulgaria with the changes in the telecom law from 2010, which ensured uncontrolled collection of data by the Ministry of Interior. We have also witnessed on several occasions misuse of such information by former minister Tsvetanov, especially, when he was reading wiretapped conversation between doctors, and used them to accuse them publicly for manslaughter.

- Protecting children and young people from abuse and exploitation)

ISOC-Bulgaria is working closely – through the Public Council for Safer Internet, and its members to ensure better environment for children and young people. Our representatives have participated in public lectures at mid-schools and we are engaged with the national Center for Safe Internet.

Question 2: What is the ITU's role to support governments in their activities around Internet-related public policy issues?

The ITU should not engage at all in Internet-related public policy issues, as they are within the sovereignty of each country – member state. Further, improvisation like the one expressed during the meeting between Dr. Toure and Russian PM Putin, where Dr. Toure has asked to discuss the increased oversight functions of the ITU over the Internet, should not be allowed in the future work of the ITU.

Question 3: Which international organizations/forums are the most adequate to receive support from the governments on the Internet-related public policy issues?

The most adequate organizations have been recognized by the ITU in the Internet resolutions from PP-10, and they are IETF, ICANN, ISOC, W3C, which provide their public forums several times a year. Also, the Internet governance forum should get a more substantial support from the governments.