

International Working Group
on Data Protection
in Telecommunications

United Nations
Chairman of the Working Group on Internet
Governance
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Draft Issues Paper on Consumer, User Protection and Privacy

Dear Mr. Desai,

I am chairing the International Working Group on Data Protection in Telecommunications (IWGDPT). The Group has tried to play an active role in the privacy-friendly development of the information society for quite some time.

The IWGDPT was founded in the framework of the International Conference of Data Protection and Privacy Commissioners in 1983. It consists of representatives from the national data protection supervisory authorities and from international data protection organisations, as well as of independent scientists, representatives from industry and other specialists in privacy and telecommunications. The biannual meetings are usually attended by about 50 persons from more than 20 countries. The Group issues common positions and working papers on data protection and privacy problems in the telecommunications sector. Since 1996 one of the main subjects that the Working Group has been dealing with are data protection and privacy matters regarding the development of the Internet. An overview of the work of the Group is available from the website of the secretariat of the Group at <<http://www.datenschutz-berlin.de/doc/int/iwgdpt/index.htm>>.

At its last meeting on 31 March / 1 April in Madeira (Portugal) the IWGDPT has discussed the mandate and the activities of the WGIG, particularly with regard to the Draft Issues Paper on Consumer, User Protection and Privacy.

The Working Group takes note and welcomes that Privacy has been identified by the WGIG as a key public policy area for further investigation and discussion. On the other hand the statement that "There is no major forum for privacy internationally" under point 5 of the Draft Issues Paper seems to be inaccurate regarding our Working Group and other international institutions like the International Conference of Data Protection and Privacy Commissioners or the OECD.

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The Working Group has been initiated
by Data Protection Commissioners
from different countries in order
to improve privacy and data protection
in telecommunications and media

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We would like to draw your attention to the attached 'Ten Commandments to protect Privacy in the Internet World', which were adopted at the Working Group's 28th meeting on 13-14 September 2000 in Berlin (also available on the Web at <http://www.datenschutz-berlin.de/doc/int/iwgdpt/tc_en.htm>).

Therewith the Working Group has identified the essential privacy principles for international (or national) agreements regarding the specific problems of telecommunications privacy in the information society. The Ten Commandments could be either integrated in existing agreements of international organisations and public and private agencies or be adopted as a separate document.

The Working Group calls on the WGIG members to take this into account when enhancing the working paper on Consumer, User Protection and Privacy.

Furthermore the IWGDPT has already dealt with Privacy and Data Protection aspects of the Registration of Domain Names on the Internet in a Common Position adopted at its 27th meeting on 4-5 May 2000 (see <http://www.datenschutz-berlin.de/doc/int/iwgdpt/dns_en.htm>) and with the Use of Unique Identifiers in Telecommunication Terminal Equipments (the example of IPv6) in a Working Paper adopted at its 31st meeting on 26-27 March 2002 (see <http://www.datenschutz-berlin.de/doc/int/iwgdpt/wpipv6_en.htm>). These documents could be of particular interest for you regarding the Draft WGIG Issue Paper on the Administration of Internet Names and IP Addresses.

Finally we would like to point to our Working Paper on Means and Procedures to Combat Cyber-Fraud in a Privacy-Friendly Way adopted at the 36th meeting on 18-19 November 2004 (available at <http://www.datenschutz-berlin.de/doc/int/iwgdpt/fraud_de/en.pdf>).

The International Working Group on Data Protection in Telecommunications is very interested in a deeper cooperation and would like to contribute to the important work of the WGIG. Please let me know in which way such a cooperation could be realized.

Yours sincerely,

Hansjürgen Garstka
(Chairman)