

**Written Statement of
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House Energy and Commerce Committee – Communications & Technology Subcommittee**

EXECUTIVE SUMMARY

International communications and spectrum policy directly affects U.S. economic and national security. Decisions made at the International Telecommunication Union (“ITU”) in the next two years—at the 2026 Plenipotentiary Conference (“PP-26”) and the 2027 World Radiocommunication Conference (“WRC-27”)—will shape global technology markets, investment incentives, and U.S. strategic influence for decades.

The ITU provides the coordinated framework that allows radiocommunication services to operate across borders by managing spectrum and orbital resources. When the framework stays clear, technically grounded, and timely, innovation scales and deployment accelerates. When it becomes outdated or fragmented, interference risks increase, equipment and manufacturing costs rise, investment slows, and strategic leverage can shift to rivals.

PP-26 and WRC-27 operate as complementary “twin engines” within the same multilateral machine. PP-26 is the ITU’s governance conference: it selects top leadership, sets budgets and strategy, and makes scope and process choices that determine how effectively the institution can do its technical work for the next cycle. WRC-27 is the treaty-level rules conference: it updates the ITU Radio Regulations that define spectrum allocations; sharing and compatibility conditions; and procedures that global equipment manufacturers, operators, and regulators rely on worldwide.

The reality is that international outcomes are largely set through years of preparation, not only during final conference sessions. To protect its competitiveness and strategic interests, the United States should –

- treat PP-26 and WRC-27 as active, multi-year campaigns because the decisive work happens now in technical studies, proposal development, and coalition building;
- prioritize outcomes that modernize the ITU Radio Regulations with potential changes to underlying assumptions only where those changes are developed through an agreed ITU study framework, tested against existing protection criteria, and not used as binding inputs to ongoing studies absent demonstrated technical justification and consensus; and
- sustain congressional engagement that reinforces preparation quality and diplomatic continuity (through oversight, staffing support, and regular attention) without prematurely locking in specific negotiating positions that may need flexibility to build coalitions.

I. INTRODUCTION

Good afternoon. Chairman Hudson, Ranking Member Matsui, and Distinguished Members of the Subcommittee. Thank you for the opportunity to testify at your Securing U.S. Leadership of Communications Technology hearing.

My name is George John. I am a partner in the Communications, Internet, and Media practice group at Hogan Lovells and focus on global communications regulatory matters. I am also the Chair of the Federal Communications Commission (“FCC”) WRC Advisory Committee (“WAC”), the federal advisory committee developing and offering public views and recommendations to the FCC on WRC matters. My testimony is presented strictly in a personal capacity.

The following written statement addresses six core subjects to assist the Subcommittee. First, it outlines the ITU and its Plenipotentiary Conference (“Plenipotentiary” or “PP”) and WRC. Second, it details the mechanisms through which the U.S. prepares for and participates in both processes. Third, it highlights notable PP-26 agenda items without preemptively advocating any specific U.S. position. Fourth, it mirrors this analysis for WRC-27 agenda items. Fifth, it underscores why immediate engagement is critical for U.S. competitiveness and strategic interests over the upcoming decade. Finally, it concludes with actionable takeaways for Members and staff.

II. THE ITU: THE OPERATING SYSTEM OF GLOBAL CONNECTIVITY

The ITU serves as the central international forum for cross-border communications regulation. Radio waves cross international lines without passports, and modern radiocommunication services can routinely serve dozens of sovereign nations simultaneously. Without a coordinated international framework, unchecked interference would rapidly cripple satellite connectivity, mobile broadband, aviation and maritime safety, weather forecasting, Earth observation, and other essential services demanding cross-border functionality. When this

framework remains clear and technically sound, technological innovation can effortlessly scale. Conversely, when these rules are allowed to become outdated or fragmented, investment predictably slows, equipment manufacturing costs artificially rise, and geopolitical strategic leverage rapidly shifts.

III. THE TWIN ENGINES OF POLICY: PLENIPOTENTIARY AND WRC

The Plenipotentiary and WRC operate as complementary gears within the same multilateral machine. The Plenipotentiary functions as the ITU's supreme governing body. In November 2026, Member States will gather to elect the organization's top management team, choose members of the ITU Council and Radio Regulations Board, and adopt the financial and strategic roadmap for the 2028 through 2031 cycle.

The WRC acts as the ITU Radio Regulations' caretaker. In October and November 2027, decisions finalized on the WRC floor will maintain and update radiofrequency allocations; sharing and compatibility conditions; and procedural rules that global equipment manufacturers, operators, and domestic regulators must follow for decades.

Consider a maritime analogy to understand the interconnected relationship between the Plenipotentiary and WRC. The Plenipotentiary selects the ship's captain, provisions the financial budget, and sets the institutional compass. The WRC writes the precise navigational rules for every vessel on the water. One shapes the institution, and the other shapes the binding rules of the road. Together, they determine whether the ITU remains a technically credible forum where American commercial interests can compete on merit.

IV. THE U.S. PREPARATION MACHINE: INTEGRATING PUBLIC AND PRIVATE EXPERTISE

As the FCC and National Telecommunications and Information Administration ("NTIA") develop U.S. positions, their work is guided by longstanding statutory mandates and

Administration policies. Congress directs the FCC to promote “rapid, efficient, and world-wide” radiocommunications. It also charges NTIA with ensuring the “efficient and cost-effective use of the spectrum” to the maximum extent feasible to foster competition and the free flow of commerce in international telecommunications markets and secure the full and efficient use of telecommunications resources by federal users. These mandates are reinforced by policies, including the Space Superiority Executive Order and the Winning the 6G Race Presidential Memorandum, emphasizing spectrum leadership across multiple radiocommunication services. Both direct aggressive spectrum policy and international advocacy to sustain U.S. technological leadership in next-generation networks.

A. U.S. Preparation for the Plenipotentiary

The U.S. prepares for the Plenipotentiary through a single, open interagency process that allows government agencies, industry, and other interested parties to coordinate U.S. views together.

B. U.S. Preparation for the WRC

The U.S. prepares for the WRC through a multi-track process that addresses the technical studies and develops potential ITU Radio Regulations updates.

i. Technical studies

Technical studies supporting WRC agenda items are conducted within ITU Working Parties. The U.S. develops its technical inputs through a single coordinated domestic process involving both federal and non-federal stakeholders to ensure alignment between government spectrum users and commercial industry participants.

ii. Potential ITU Radio Regulations updates

Potential ITU Radio Regulations updates are developed through two complementary pathways.

Pathway 1 (U.S. alone). The U.S. develops and submits inputs through the same unified federal and non-federal preparation process used for technical studies.

Pathway 2 (Inter-American Telecommunication Commission (“CITEL”), including the US and other North, Central, and South American countries). The U.S. develops and submits inputs through the following two parallel lower-level domestic pathways so that CITEL can submit a US proposal as a regional proposal to the WRC:

- the FCC WAC (including its informal working groups) representing non-federal stakeholders, and
- the NTIA Radio Conference Subcommittee representing federal stakeholders.

For CITEL to submit a U.S. proposal as an Inter-American Proposal, at least six CITEL member administrations must support it.

V. PP-26 IMPERATIVES: DEFENDING GOVERNANCE AND INSTITUTIONAL INTEGRITY

PP-26 represents a critical governance event with profound downstream consequences for American technology. Process choices established at the Plenipotentiary conference dictate the institution’s effectiveness during the exact cycle in which WRC-27 outcomes are negotiated and implemented.

Leadership elections will dominate the diplomatic agenda. The U.S. has advanced candidates, including Doreen Bogdan-Martin for Secretary-General and Jennifer Warren for the Radio Regulations Board. These selections fundamentally shape management quality, procedural fairness, and institutional credibility.

Strategic budgeting will directly determine the organization’s technical capacity. Decisions regarding the financial roadmap for 2028 through 2031 affect staffing levels and the ability of

study groups to keep pace with rapid technological change. Adequate resourcing ensures that satellite filing reviews and dense technical analyses are not bottlenecked by institutional austerity.

Scope and mandate debates pose persistent jurisdictional challenges. Recent cycles have seen concerted efforts to expand the ITU's mandate beyond traditional telecommunications into broader topics, such as space sustainability. The U.S. should remain vigilant against mandate expansion that dilutes the ITU's core technical competence and focus efforts on ensuring that the current ITU mandates, including spectral efficiency maximization, are appropriately satisfied.

VI. WRC-27 PRIORITIES: ENGINEERING THE RULES OF THE ROAD

WRC-27 features a technically dense agenda carrying massive implications for global deployment, capital investment, and innovation. To maintain American superiority, several highly specific thematic clusters demand immediate strategic focus.

Satellite regulatory modernization represents a major, sustained technical workstream. WRC-27 will meticulously address a wide range of highly complex satellite topics, including critical operational flexibility, coordination procedures, earth stations in motion, service area questions, and numerous other procedural matters affecting both geostationary and non-geostationary orbit networks and systems. These specific issues may appear superficially technical, but minor, seemingly obscure changes in international procedure can immediately translate into major, real-world consequences for deployment timelines, essential interference protection, and overarching global market access.

Mobile broadband and future International Mobile Telecommunications ("IMT") capacity will predictably remain a massive central area of study. Current evaluations remain subject to rigorous sharing and compatibility analyses alongside the necessity of ensuring protection for incumbent services. Ultimately, these technical studies will help determine exactly how future mobile ecosystems may structurally evolve on an international scale.

Direct connectivity bridging satellites and standard user devices has transitioned into a mainstream policy issue. WRC-27 will consider possible new international mobile-satellite service allocations designed specifically for direct connectivity between space stations and standard IMT user equipment to seamlessly complement existing terrestrial coverage.

Space sustainability and sovereignty-adjacent concerns may become significantly more visible at this conference. Foreign administrations may increasingly frame technical engineering debates strictly in terms of operational autonomy, national jurisdiction, and tight control over strategic infrastructure. Early, resolute engagement helps ensure those debates remain firmly grounded in workable, objective engineering and highly predictable rules.

The larger, overarching point remains that all these agenda items are deeply connected. WRC negotiations rarely, if ever, involve isolating one clean issue at a time. They heavily resemble a massive mobile of hanging pieces: deliberately move one element, and several others inevitably shift in direct response. That cascading reality is exactly why meticulous technical studies, early strategic U.S. proposal finalization, and robust coalition management matter so profoundly.

VII. STRATEGIC IMPLICATIONS AND THE MODERNIZATION IMPERATIVE

International spectrum decisions actively engineer global market structure; they do not merely dictate simple technical compliance. WRC outcomes thoroughly influence which innovative radiocommunication services can successfully scale globally, exactly how quickly equipment ecosystems mature, and whether U.S. entities can equitably compete abroad on highly favorable terms. Successful harmonization predictably lowers manufacturing costs and drastically accelerates global deployment. Regulatory fragmentation usually does the exact opposite; it stifles growth and strands capital.

Early and aggressive engagement directly improves vital investment certainty and time-to-market metrics. Complex and advanced chipsets, radios, and architectures are purposefully

designed around expected, durable regulatory environments. Predictable, modern rules effectively reduce financial risk and materially speed deployment. Conversely, persistent uncertainty forces highly defensive engineering design, severely increases overhead costs, and can fatally delay planned launches and network rollouts.

International standards and global supply-chain leverage routinely flow directly from these treaty-level spectrum outcomes. When the world's major markets align around common or highly compatible frequency bands, immense manufacturing scale organically follows. That harmonization structurally strengthens domestic vendor ecosystems, dramatically improves technical interoperability, and significantly reduces barriers to entry for new competitors. When the globe inevitably splinters into highly incompatible regulatory approaches, equipment costs skyrocket, and geopolitical leverage predictably shifts rapidly away from those innovators attempting to construct seamless global systems.

Spectrum efficiency depends heavily on the assumptions embedded in the rules, and some of those assumptions may no longer reflect modern technology. The ITU Radio Regulations may still incorporate engineering premises that were sensible decades ago but are more strained by today's far more capable radiocommunication services. A useful analogy is building codes written for early low-rise structures: if the rules assume every building is three stories tall, modern skyscraper designs may be forced to follow outdated safety margins, spacing, and load assumptions that unnecessarily limit what new engineering can safely achieve. A similar dynamic exists in international spectrum policy. Legacy technical assumptions embedded in treaty rules can unintentionally constrain newer technologies that could be more efficient. Because changes to the ITU Radio Regulations require global consensus, modernization proceeds slowly and makes early technical studies and groundwork essential before WRC-27 can update the framework.

VIII. KEY TAKEAWAYS FOR CONGRESSIONAL ACTION

Ultimately, U.S. credibility abroad explicitly rests on maintaining technically grounded unity at home. A fully coordinated national approach carries substantially more diplomatic weight in technical study groups, regional fora, and conference floor negotiations than fragmented, late-breaking positions ever could. That unshakeable unity is precisely how the U.S. strategically sustains global coalitions in an environment where other major geopolitical players currently invest heavily in long-cycle regulatory influence.

Congressional engagement remains essential to help preserve vital diplomatic continuity. International negotiations of this highly complex kind are distinctly long-cycle efforts. They highly reward sustained expert staffing, deep technical participation, diplomatic follow-through, and rigorous bipartisan attention. In that highly practical sense, Congress effectively plays a role distinctly similar to the dense keel of a massive ship: while not always visible above the waterline, it remains absolutely essential to the forward momentum and fundamental stability of the entire vessel. In turn, four actionable takeaways deserve distinct emphasis:

1) Treat PP-26 and WRC-27 as active, multi-year campaigns, not discrete, isolated events.

The truly decisive work happens right now and is heavily embedded within early technical studies, CPM method development, and regional coordination. Passively waiting severely compresses diplomatic options and predictably yields massive agenda-setting advantages to foreign first movers. Furthermore, practical support simultaneously matters deeply at the human level. It explicitly includes the ability to appropriately staff expert delegations and seamlessly plan complex logistics for multi-week international conferences located in Doha and Shanghai.

2) Prioritize outcomes that modernize the ITU Radio Regulations with potential changes to underlying assumptions only where those changes are developed through an agreed ITU study framework, tested against existing protection criteria, and not used as binding inputs to ongoing

studies absent demonstrated technical justification and consensus. Crucial decisions regarding executive leadership, comprehensive budgeting, and institutional scope directly affect whether the ITU possesses the capacity to successfully administer and modernize to keep proper pace with next-generation radiocommunication services. But such changes should be evaluated through an agreed scope, methodology, and governance process and should not be embedded as pre-selected values or operative inputs for ongoing WRC studies absent demonstrated technical justification and consensus.

3) Consider enacting targeted congressional actions that powerfully reinforce preparation quality without rigidly dictating specific negotiating outcomes. Congress can reinforce the quality and coordination of U.S. preparation through frequent engagement with relevant agencies and other oversight mechanisms while avoiding mandates that predetermine specific negotiating positions. Preserving that flexibility allows U.S. negotiators to adapt and build coalitions effectively.

IX. CONCLUSION

American international communications leadership is comprehensively built long before diplomatic delegates ever arrive at a distant conference hall. It is painstakingly constructed through dense technical studies, highly transparent domestic preparation, whole-of-government coordination, and remarkably steady engagement with global allies and regional partners.

PP-26 and WRC-27 will forcefully shape the binding institutional and treaty-level framework for global communications deep into the late 2020s and far beyond. The U.S. boldly enters this critical, multi-year process possessing very real structural advantages: world-leading technical engineering expertise; exceptionally broad commercial industry participation; and a proven, unmatched ability to develop highly credible international proposals. Safeguarding these

massive strategic advantages permanently requires regular congressional attention and incredibly early diplomatic engagement.

Thank you for the opportunity to provide this statement. The Subcommittee's commitment to securing America's technological future is deeply appreciated. Your questions are welcome.