

October 21, 2024

Mr. Ajay Banga
President of the World Bank Group
The World Bank
1818 H Street, NW
Washington, DC 20433

Dear Mr. Banga,

On behalf of the undersigned associations, we write to convey our strong support for the World Bank Group's role in designing, deploying and governing digital public infrastructure (DPI) to facilitate empowerment, inclusion, and resilience.

DPI initiatives require robust governance frameworks and safeguards to secure the digital future of providers and users. Therefore, we wish to share principles that we think will maximize the successful creation and deployment of DPI in advance of the World Bank and International Monetary Fund's Annual Meetings and the meetings of the G20 finance deputies, finance ministers, and central banks in late October.

The promise of DPI lies in the opportunity to complement private sector initiatives that facilitate access to services and promote inclusion. From our perspective, DPI initiatives have the potential to accelerate digital transformation across economies. However, DPI initiatives require robust governance frameworks and safeguards to secure the digital future of providers and users across the global economy.

As you know, in September 2023, the G20 and the World Bank jointly [published](#) policy recommendations for good governance for DPI. Thus far, however, we have observed that country practices vary significantly and, in some cases, do not adhere to international guidance and best practices. Policies that unfairly exclude qualified global firms potentially threaten competition, innovation and the opportunity to accelerate and democratize digital inclusion. In addition, exclusionary practices can create new, longer-term risks, such as emerging cybersecurity threats, to consumers.

As countries move forward in developing and implementing DPI, we encourage the World Bank and its members to guard against digital fragmentation, exclusionary conduct, fraud and cyber threats. Moreover, DPI initiatives should be economically sustainable with opportunities for firms to create value from such digital technologies, thereby fostering competition.

To overcome these challenges and maximize the benefits of DPI, we recommend that the World Bank champion DPI initiatives that adhere to the following principles:

1. **Transparent governance that fosters consumer trust and emphasizes data security and privacy:** Governance frameworks that prioritize privacy, data security, and intellectual property and ensure that citizens have visibility and control over their data are crucial to maintaining consumer trust in DPI systems and to protecting fundamental rights. Governance of DPI

operating entities should be transparent and developed through an open, multistakeholder process—including the private sector. These frameworks should follow global best practices by defining clear roles and responsibilities, particularly to prevent conflicts of interest between regulators and DPI operators.

2. **Incorporate public-private collaboration to develop DPI that meets the best technical standards:** Engaging the private sector in developing DPI initiatives can ensure these systems are not only technically sound, but also resilient in the face of ongoing cyber threats and financial fraud. From our perspective, DPI technical and assessment standards are currently underdeveloped, and we endorse efforts to achieve consensus on these issues, inclusive of public and private sector input.
3. **Pursue fair, open markets that preserve market access for the private sector:** Open and transparent procurement and participation processes in DPI projects can ensure that all players have fair, nondiscriminatory access to build and operate digital services atop and alongside a DPI. At the same time, the adoption of DPI initiatives by firms should be organic and determined by market demand, and the requirement to participate in such initiatives should be non-binding and voluntary. This will ensure the long-term success of national infrastructures that are built to a competitive global standard, and based on a sustainable economic model.
4. **Global interoperability which promotes consumer choice and the free flow of data:** Interoperability allows consumers more choice to exercise their preferences. Interoperability also means promoting cross-border connectivity and harmonized standards to help ensure that the digital economy remains interconnected and inclusive.

We recognize and appreciate the work the World Bank has done thus far to explore DPI through the [Global Partnership for Financial Inclusion \(GPFI\)](#), and other related avenues, and your long-standing work to support key components of digital infrastructure such as payment systems modernization and Digital ID.

We welcome the opportunity to further discuss these recommendations and work towards the successful implementation of DPI.

Sincerely,

Coalition of Services Industries

National Foreign Trade Council

Computer & Communications Industry Association

Payments Leadership Council

Electronic Transactions Association

U.S. Chamber of Commerce

Global Data Alliance

US-India Strategic Partnership Forum

Information Technology Industry Council