Information Technology Industry Council
Leading Policy for the Innovation Economy

3 December 2010

Ms. Anne Caldas
Secretary
Executive Standards Council
American National Standards Institute
25 West 43 Street, 4th Floor
NY, NY 10036

Via Email

Dear Ms. Caldas:

On behalf of the Information Technology Industry Council, ITI, I welcome the opportunity to provide comments on proposed changes to the ANSI Essential Requirements (ExSC 8096). After careful consideration of the proposed new Essential Requirements regarding unnecessary duplication, ITI is concerned that these new US requirements will impose greater barriers for the information and communications technology industry to craft a business case that supports ANSI engagement and US national standards development. ITI does not support the proposed changes in ExSC 8096.

ITI is the premiere voice, advocate and thought leader for the U.S. information and communications technology (ICT) industry. Our members are world leaders in innovation from all sectors of the digital economy − hardware, software, services and the Internet − and are strong advocates of a global, voluntary, consensus-based ICT standardisation system that is market-driven and private sector-led.

The ICT standards ecosystem is very diverse. No single standards body or process necessarily produces "better" standards; the test of success, relevance, and quality of a standard is the extent to which it ultimately gets adopted by the marketplace. Flexibility, competition and choice are essential ingredients in ICT industry members' decision to participate in standards development. The ICT marketplace -- and its related needs -- change rapidly. As a result, ICT standards must be able to change in response.

New standards, whether duplicating previous ones or not, must be permitted to compete in order to respond to these needs. Under ANSI's proposed procedural changes, ANSI-accredited standards developers will be further disadvantaged in the broader ICT standards ecosystem. For the ICT industry, any "first-in-time" approach to selecting which standard can be deemed an American National Standard, and the imposition of a more burdensome process to address related issues (including the onus of proving a "compelling need" for a second standard), likely will inhibit the recognition of new, innovative standards solutions and may result in the alienation of the ICT industry from ANSI.

ICT standards are generally global in nature, and ITI therefore strongly agrees with the participating national bodies of ISO/IEC JTC 1 (Information Technology), which, noting ISO's and IEC's "one standard" principle, further resolved why the acceptance of any specific ICT standard should be determined by the marketplace and not by some set of procedural rules (please see Resolution 49, ISO/IEC JTC 1 N9417 (2008-11-18), hereafter, Resolution 49, a copy of which is attached to this correspondence).

ITI members rely on the existing ANSI Essential Requirements and find they already provide an adequate mechanism to reduce unintended conflict and duplication. ITI believes that ANSI's goals are poorly served by the use of the concept of "unnecessary duplication" which is ultimately based on a value judgment that removes market influences, and is inconsistent with Resolution 49.

Thank you for the opportunity to comment.

Sincerely,

Ken J. Salaets
Director

Resolution 49 in ISO/IEC JTC 1 N9417 (2008-11-18)

Resolution 49 ‑ Clarification on Consistency of Standards vs. Competing Specifications

JTC 1 notes the nature of standardization is to attract innovative ideas from multiple sources, choose the best ones and codify them in specifications that facilitate widespread use.

Further, consistent with ISO's and IEC's 'one standard' principle (for example TMB's policy and principle statement on Global Relevance), there are times when one standard is all that is required to meet the needs of the marketplace, especially in a particular application area, and there are other instances where multiple standards make the most sense to respond to market requirements and to the needs of our society. In reducing the number of alternatives to a reasonable minimum, JTC 1 and other SDOs have demonstrated that it is not necessary and may not be desirable to choose only one alternative or option for standardization.

Further, JTC 1 notes that the cycle of innovation in the ICT sector has resulted in the continuous introduction of new technologies that improve upon existing standards. Any attempt to choose only one standard would ignore and threaten to inhibit the cycle of innovation that continues to fuel this industry. Therefore, JTC 1 recognizes its commitment to ISO's and IEC's 'one standard' principle; however, it recognizes that neither it nor its SCs are in a position to mandate either the creation or the use of a single standard, and that there are times when multiple standards make the most sense in order to respond to the needs of the marketplace and of society at large. It is not practical to define, a priori, criteria for making these decisions. Therefore each standard must be judged by the National Bodies, based on their markets, on its own merits.