

November 12, 2009

Honorable Bart Gordon
Chairman
House Committee on Science and Technology
Washington, DC 20515

Dear Mr. Chairman:

The American National Standards Institute (ANSI) is pleased to respond to your questions on the standards-setting process and the global acceptance of standards and conformance activities. We want to thank your staff for allowing us this opportunity to reply to these questions of shared interest and mutual concern.

By way of background, ANSI is a private, non-profit organization that administers and coordinates the U.S. voluntary standards and conformity assessment system; our efforts represent the interests of more than 125,000 companies and 3.5 million professionals worldwide. The Institute works closely with stakeholders from both industry and government to identify consensus-based solutions to national and global priorities – an inclusive, collaborative partnership between the public and private sectors.

It is in this spirit of cooperation and partnership that we reply to the four questions offered in your Statement of Inquiry.

Question 1 How important are technical standards?

Standards are the backbone of trade, the building blocks for innovation, and the basis for quality, safety, and interoperability

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Voluntary consensus standards and compliance activities are essential to the U.S. economy. Market driven and highly diversified, standards support technological innovation, build bridges to new markets, and create gateways for businesses in this increasingly complex world of global access.

If innovation is the fuel of economic engines, then standards are a critical element of the formula. In some cases, a standard will precede innovation by establishing a baseline for design and performance that will satisfy user requirements. Other times, an innovative idea that finds its place in the market becomes the foundation of a new standard, which then becomes the physical documentation of an agreed-upon solution that has already been time-tested and proven.

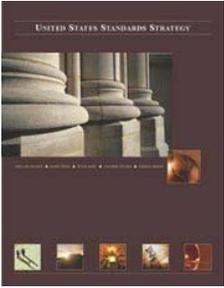
This relationship between standards and innovation is one of the greatest advantages of our national standards system. We have found that a market-driven and sector-specific approach to standards setting is most effective because there is no single entity that predetermines the best standard or solution. Unlike the standards development systems of many other countries, the U.S. system systematically considers the views of all

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In [the U.S. government's] view, the standard setting process should be voluntary and market-driven.

Unnecessary government intervention can impair innovation, standards development, industry competitiveness, and consumer choice.

The U.S. government recognizes its responsibility to the broader public interest by providing financial support for, and promoting the principles of, our standards setting system globally.

— U.S. Patent and Trademark Office
[\[click here to view the full statement\]](#)

interested parties in a balanced way, leading to some of the most robust standards in the world. And the openness of our national standards system to new participants means that their needs can be met quickly and through innovative, collaborative solutions.

Question 2 Do you think a comprehensive review of our standards-setting process is timely and worthwhile?

It is always a valuable exercise to conduct a comprehensive review of any system or process on a periodic basis. Over the past ten years, the U.S. standardization community – including government agencies – has done just that with the publication of a *National Standards Strategy* (2000) and again with an updated *United States Standards Strategy* (USSS; 2005).

Earlier this year, ANSI also looked at the U.S. standards system and processes when we responded to the [National Survey of United States Standardization Policies](#) issued by the Center for Global Standards Analysis. According to the final survey report, “the virtually unanimous view from survey respondents is that current United States policies for the development of private-sector technology standards are working well, and that no changes to those policies or the current balance of private-sector/public-sector partnership relating to standards are necessary at this time.”

It is important to note that the U.S. standards and conformance system is devoted to continuous improvement to meet the needs of industry, government, and consumers. Strong, flexible, and vibrant, the system has built-in procedures for transparency, openness, due process, and mandated review of all standards on a recurrent basis assure its responsiveness.

The *United States Standards Strategy* (USSS) describes our national standards system and offers strategic initiatives and guidance that can be applied within the various sectors of our national economy. This sector-specific approach allows interested parties to address their own issues and develop working methods that fit the problems at hand, since no single standards system can satisfy all needs. When cross-sectoral issues arise, sector definitions change, or in venues where a single national voice is required, the infrastructure provided by ANSI provides facilitation and mediation.

Question 3 With the globalization of technology development and business, is it time to assess an international standards system developed 50 years ago?

ANSI believes that the current international standards system is working well. It would be helpful to have an opportunity to better understand any concerns that you may have about the system so that we may work to address them. A meeting request letter has been sent under separate cover so that we may pursue this discussion.

Just as our national standards system has been reviewed by its participants over the years, so too have the International Organization for Standardization (ISO), International Electrotechnical Commission (IEC), and the International Telecommunication Union (ITU) examined the evolving needs of their constituents.

Within ISO, the U.S. participates on nearly **80% of the technical work**, while within IEC, we participate in **nearly 90%**.

This rate of participation is one of the highest in the world.

As the national member body to both ISO and IEC, ANSI is dedicated to ensuring that U.S. interests continue to be well served in the global standardization arena.

“The growth of our industry could not have been achieved without the voluntary collaboration of private industry stakeholders in partnership with government in the development of globally relevant standards.”

– Information Technology Industry Council

One such example is the formation of the World Standards Cooperation (WSC) in 2001, which works to ensure that ISO, IEC, and ITU work transparently, increase collaborative opportunities, and avoid duplication and overlap of technical work.

As a founding member of ISO and a participant in the IEC for over a century, the U.S. enjoys a position of significant leadership within these organizations. Americans have served and continue to serve as officers and as influential members of all ISO and IEC governance bodies. We work very hard to garner broad support for the suggested improvements we put forward, and have developed strong relationships with many of our global partners within the international standardization community. As a result, we have been very successful in suggesting increased coordination and multiple process changes to the global system that benefit U.S. stakeholders.

For example, ANSI used its strong position to lead the development of the ISO Global Relevance Policy, which stipulates that ISO standards must be broadly relevant for application worldwide, and should not favor the needs or preferences of any particular country or region. And when U.S. constituents were concerned about new ISO and IEC standards that could be seen to usurp governmental authority, ANSI led the development of a set of principles to ensure that ISO and IEC standards provide solid tools to support the implementation – not set the direction – of public policies.

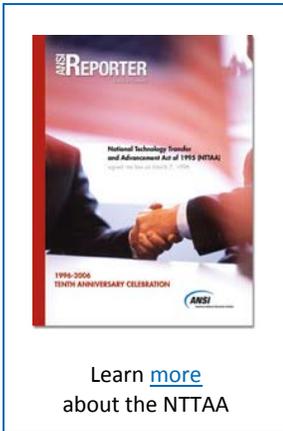
In addition to our governance and policy-level leadership, U.S. technical experts populate – and in many cases lead – ISO and IEC technical committees and subcommittees on a diverse array of subjects of particular importance to the U.S. economy. A few examples include:

Top U.S. export	International technical leadership by U.S.
Aircraft/space vehicles	Chairman and secretariat, ISO Technical Committee (TC) 20, <i>Aircraft and space vehicles</i>
Electronic equipment	Chairman, IEC TC 47, <i>Semiconductor devices</i>
Financial services	Chairman and secretariat, ISO TC 68, <i>Financial Services</i>
Information technology products	Chairman and secretariat, ISO/IEC Joint Technical Committee 1, <i>Information technologies</i>
Machinery	Chairman and secretariat of ISO TC 11, <i>Boilers and pressure vessels</i> , and ISO TC 192, <i>Gas turbines</i>
Plastics	Chairman and secretariat, ISO TC 61, <i>Plastics</i>

But working through ISO and IEC technical committees is not the only way to develop an international standard. The USSS advocates strongly that there are “multiple paths” to the development of a globally relevant standard, encouraging the U.S. standards community to “actively promote the consistent worldwide application of internationally recognized principles in the development of standards.”¹

Both the U.S. government and private sector participate in international standards activities in a variety of ways: through treaty organizations such as ITU where governments are members; through organizations like ISO and IEC where the U.S. is represented by a single “national body” organization; through professional and

¹ “Internationally recognized principles” are contained in the World Trade Organization (WTO) Agreement on Technical Barriers to Trade (TBT) and the WTO TBT Committee’s Decision on Principles for the Development of International Standards. The text can be viewed online at www.wto.org/english/docs_e/legal_e/17-tbt.doc.



technical organizations whose membership is on an individual or organizational basis; and through consortia, whose membership is typically technology based.

The [recent list](#) of standards identified by the National Institute for Standards and Technology (NIST) for inclusion in the Smart Grid Interoperability Standards Framework is an excellent example of this diversity – it includes several IEC standards; globally relevant standards developed by IEEE, a U.S.-based organization; American National Standards; and consortium standards, among others.

Question 4 As you know, the administrations recent 60-day cyber-security review recommends a single point in the federal government to coordinate our government’s position on international cyber standards. Should the Committee examine this issue, a single federal coordinating point for all technical standards areas?

The U.S. government has clearly recognized the importance of interagency coordination of standards policy with the establishment of the Interagency Committee on Standards Policy (ICSP). Coordinated by the National Institute of Standards and Technology (NIST), the ICSP brings together the Standards Officers of the various federal agencies to discuss standards issues of interest and/or concern to the agencies. Twice per year, ANSI governance leadership meets in conjunction with the ICSP to coordinate efforts.

In ANSI’s view, interagency technical coordination and increased participation by government experts in standards development work is strongly encouraged. In fact, federal agency technical representatives are often active participants in many standards-setting activities, and that participation is both valued and welcomed. When the government has particular concerns about specific areas of technical activity, then agency representatives should work within the voluntary consensus standards system to help craft coordinated solutions that meet the needs of both the public and private sectors.

In addition, the *National Technology Transfer and Advancement Act of 1995* (NTTAA) directs federal government agencies to use, wherever feasible, standards and conformity assessment solutions developed or adopted by private, voluntary consensus standards bodies in lieu of developing government-unique standards or regulations. The voluntary consensus standards are to be used for both agency regulatory purposes as well as in their procurement activities.

Chairman Gordon, on behalf of ANSI and all of our member organizations, we thank you for the opportunity to respond to this inquiry. We look forward to the opportunity to discuss many of these issues with you in person in the near future.

Sincerely,

S. Joe Bhatia
President and CEO