DIGITALEUROPE's Comments on Section II.2 of the Consultation on Standards in the DSM

Brussels, 17 December 2015

1. Priority domains for standardisation in the Digital Single Market

DIGITALEUROPE believes that the approach to identify the need for development of European standards in the Digital Single Market should be improved and not limited to the classification/prioritisation of 10 domains.

DIGITALEUROPE notes that the consultation does not take into account the important work developed by the European Multi Stakeholder Platform (MSP) with the consolidation of a detailed Rolling Plan for ICT standardisation - which covers all relevant domains involved in the development of innovative digital tools and services – and the associated advice for the priority ICT standards Plan. These two documents developed by the MSP provide relevant information (resulting from broad consensus of all MSP members) relating to the questions raised in section II.2 of the consultation and should be taken as the basis for any further work in this domain. In other words, any additional request should be submitted to the MSP for evaluation and integration into these working documents.

2. Background information to take into account

In order to effectively lead the European standardisation strategy in the ICT/digital domain, DIGITALEUROPE considers that the following elements should be taken into account in the most appropriate and efficient way.

2.1 Standardisation is of global relevance for industry and other stakeholders

Taking a global approach in European standardisation is important for the vitality of the European Standardisation System (ESS) and for making sure that first-class results are produced. For the ICT/digital sector, the Multi Stakeholder Platform (MSP) provides a forum for discussion and exchange with global organisations included. This ensures first-class advice to the European Commission on matters related to ICT/digital standardisation and ICT/digital related standards in support of European policy and public procurement. The EU Rolling Plan on ICT Standardisation, moreover, has taken a global approach by addressing all relevant global ICT standards development organisations and taking their work and output into account. Early consultation with industry before the start of standardisation work is advisable. For the effective management of the European ICT/digital standardisation, it is essential to involve the MSP at all stages (including the very initial ones).

The primary objective of a European Standard is to support the European single market whilst European Standards may have global reach. . The work initiated by the MSP to recognize/identify consortia and fora specifications, the existence of which can avoid the need to develop an EU specific solution. Global market access is facilitated by the adoption of global and international standards, and only where these do not exist should a European Standard be developed. The development of European Standards should not duplicate the development of global ICT standards, especially in base technologies and services. Its primary focus should be in the development of innovative applications relying on these generic global standards. In this context, if any

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complement is identified (e.g. need of additional APIs, complementary features, etc.) in relation to an existing global standard, the request should be submitted to the organization who owns the standard to develop a revised version including the additional expected elements. In this context, the information included in the ICT standardisation Rolling Plan does provide all relevant information on global standards (existing or under development) and should be used as the reference tool to ensure an effective coordination and complementarity between the development of European Standards versus international/global ones.

In general, international and global standards should have priority over regional ones, mandated work should only be started in areas where there is a justified need for a regional standard. Other regions (who frequently take direction from Europe) should be encouraged to follow this approach.

2.2 Market needs - having a critical mass of affected and interested stakeholders - are important for reaching high-quality results in standardisation

Global market needs should not be traded off against local expectations, especially in the case of mandated standards. It is more important that the standard meets the objectives in a sensible way rather than to make sure that such mandates are instituted quickly. Experience shows that wherever there is a strong market need projects finish timely; where there is limited market need or a longer horizon, projects also tend to take longer. Regardless of the type of standard or its origin, a standards process needs to have a reasonable prediction of broad market adoption.

Finally, any duplication of efforts should be avoided, i.e. work started in Europe should not duplicate work already going on globally, e.g. in ISO, IEC, ITU-T or in ICT fora/consortia.

2.3 Timeliness versus speed

Consensus is important as well and may sometimes take time to achieve. In general, all projects are different and therefore may run and progress differently. Some can be fast, others require more time, e.g. for reaching compromise and common agreement about technologies and in the consensus-building process. In complex or diverging situations consensus may take time. The focus on speed should, therefore, be changed to timeliness and to efficient and effective processes in standards development.

The European Standardisation Organisations (ESOs) are platforms for technical work which is performed by industry and other stakeholders. The functioning of these platforms very much depends on the processes which have been implemented. It is up to the stakeholders to constantly review the processes and look for possible improvements.

Direct participation of experts regardless of their origin, as is common practice in ETSI, can help clarify things more directly and easily than working with national delegations as in CEN/CENELEC – even more so if international experts on the topic cannot participate at all because of not being member of a national delegation or mirror committee. In a globalised world the European standardisation system needs to become more inclusive by allowing international experts to participate (not via national representatives).

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2.4 Early involvement of industry

Industry being the primary contributor to the development of standards, it should systematically be consulted about intended mandates and their content. For ICT/digital related European Standards, a proper consultation of the MSP should be made prior to the finalisation of any request. This should not be just informing the MSP, but should seek the views as to whether there is stakeholder (including industry) support and taking advice on existing and relevant global standards or standardisation efforts.

2.5 Effective representation of stakeholders

The direct engagement of key technical experts from industry is essential for the development and success of standards. In parts the current European standardisation does not easily allow for international experts to actively participate. The model of ETSI has the advantage that any global company can participate and send experts directly to bring in their expertise and state-of-the-art knowledge. For technical products and services it is vital that those who have to implement the standard are involved in its development. Where there is a high level of knowledge and awareness available, where standardisation has been identified as relevant to the stakeholders and where there is a clear business case, the level of participation is usually high and effective.

2.6 Information flow

Information flow and involvement of all stakeholders could be improved with more direct information flow to stakeholders. The full potential of modern IT technologies is not explored yet. Modern IT technologies like notification systems should be applied that allow stakeholders to subscribe and receive information about new projects and new project proposals. Any interested stakeholder should have the opportunity to receive full information and benefit from full transparency regarding new projects and the progress of running projects and standards developments.

The information flow in ETSI is very good with direct involvement of the stakeholders and the ability for any ETSI member to receive all information. ETSI can function as a best practice in this respect. Also, some global ICT standardisation organisations (e.g. OASIS, W3C) can be role models in terms of information flow and providing transparency regarding the work in technical committees.

3. Overall conclusions/recommendations

The Multi Stakeholder Platform (MSP) set up by the European Commission is the right and qualified structure to plan and manage all European standardization activities relating to ICT/digital domains.

The consultation of the MSP early on in the mandate process needs to be implemented. This will ensure first-class advice to the Commission – especially regarding market need, objectives and possible overlaps with already ongoing global work. It is essential to look beyond the mere needs for Europe and acknowledge that globalised economies and markets and international competitiveness require different approaches than dealing with what facilitates the European harmonised market. In the ICT/digital context, leveraging from existing standards and work in progress at the international/global level, especially from fora and consortia is essential to select the right priorities and manage them in a dynamic, creative and forward-looking way.

Further, all the European standardisation organisations should follow available best practices and implement and promote open, effective and transparent information flow about ongoing projects, their status, work in progress, next steps, etc. to all interested stakeholders.

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ABOUT DIGITALEUROPE

DIGITALEUROPE represents the digital technology industry in Europe. Our members include some of the world's largest IT, telecoms and consumer electronics companies and national associations from every part of Europe. DIGITALEUROPE wants European businesses and citizens to benefit fully from digital technologies and for Europe to grow, attract and sustain the world's best digital technology companies.

DIGITALEUROPE ensures industry participation in the development and implementation of EU policies. DIGITALEUROPE's members include 59 corporate members and 35 national trade associations from across Europe. Our website provides further information on our recent news and activities: http://www.digitaleurope.org

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