



U.S. Department of Commerce
National Telecommunications and Information Administration
Docket No. 160509408–6408–01

**Input on Proposals and Positions for
2016 World Telecommunication
Standardization Assembly**

Comments from the American National Standards Institute

As the coordinator of the private-sector-led U.S. standards and conformity assessment system, the American National Standards Institute (ANSI) oversees the creation, promulgation, and use of thousands of norms and guidelines that directly impact businesses in nearly every sector: from acoustical devices to construction equipment, from energy distribution to the information and communication technology (ICT) sector, and many more. ANSI also represents the U.S. internationally as the member body to the International Organization for Standardization (ISO) and, via the U.S. National Committee (USNC), to the International Electrotechnical Commission (IEC).

ANSI is pleased to submit these comments to the National Telecommunications and Information Administration (NTIA) of the U.S. Department of Commerce regarding the request for input on proposals and positions for 2016 World Telecommunication Standardization Assembly. When addressing some of the questions posed by the NTIA, ANSI would like to note that the information has been gathered and collated from its membership and the ANSI International Policy Committee (IPC).

From the perspective of ANSI and its members, some of the most important international standardization policy issues include the following:

- Coordination of standards development on converging technologies – Increasingly, new technologies cross the traditional scope boundaries of telecommunications, electrotechnical, and non-electrotechnical. Stakeholders who may be broadly affected expect a coherent global approach for their benefit and resource efficiency/management.
- Protection of copyright (within international standards and in the source documents for international standards) – The integrity of the content of international standards must be protected as well as the international standardization activities that are reliant on revenue from those standards. In addition, the original copyright on which international standards are based must be respected and protected.
- Ensuring global relevance – Effective international trade will be facilitated and standards-related trade barriers will be avoided through the development of international standards that comply with the WTO TBT principles for international standardization, rather than the development of standards favoring the markets and technologies of specific regions or countries.
- Engaging under-represented nations and stakeholders – The WTO TBT principles address the need for effective developing country engagement in international standards development. This

will lead to international standards with greater global relevance and bolster the economies of the developing countries. More effective engagement of under-represented stakeholder categories in international standards development will ensure that the resulting standards have greater credibility and broader acceptance.

While many standardization subject areas are important, the following examples stand out:

- Smart and sustainable communities – The increase in urbanization, climate change impacts, and aging infrastructure, combined with the ready availability of new capabilities to use urban data, have given rise to a flurry of standardization activities at the national, regional, and international levels in relation to smart and sustainable cities.
- Aging populations – As a result of increased life expectancy in both developed and developing countries, the world will experience a significant growth in the older population over the next few decades. The international standardization community has an opportunity to address needs in this topic are for the benefit human quality of life in the future.
- Smart manufacturing – Today, successful manufacturers will rely on technologies that help them quickly adapt to rapid change and to elevate product quality while optimizing use of energy and resources. These technologies form the core of an emerging, information-centric, smart manufacturing system that maximizes the flow and re-use of data throughout the enterprise. The ability of disparate systems, however, to exchange, understand, and exploit product, production, and business data rests critically on information standards.¹
- The Internet of Things (IoT) – When addressing the area of IoT, which also encompasses smart technologies such as smart grid, smart homes, smart cities, intelligent transportation systems, and smart and wearable devices amongst many others, an abundance of stakeholders are involved, and it will be important to embrace the importance of globally relevant standards and global approaches to conformity assessment.
- Services – In the U.S. and in most countries globally, the services economy is becoming the largest segment of the national economies (in some cases such as the U.S. as much as 80%). However, the percentage of standards development related to services trails significantly behind this trend.

ANSI and its members have a strong interest in working with the International Telecommunication Union (ITU) Telecommunication Standardization Bureau (TSB) to ensure coordination and collaboration among standards bodies in the U.S. and internationally. Towards that end, ANSI hosted Dr. Chaesub Lee, director of the ITU-T, for a roundtable on telecommunications, information and communications technologies (ICT), and related industries on November 13, 2015. It was identified during this discussion that there is a need for better coordination of work programs to avoid duplication of efforts amongst standards developing organizations (SDOs). A major area of scope overlap comes between ITU and

¹ “Current Standards Landscape for Smart Manufacturing Systems”, NIST
<http://nvlpubs.nist.gov/nistpubs/ir/2016/NIST.IR.8107.pdf>

ISO/IEC Joint Technical Committee (JTC) 1, *Information technologies*², including topics like big data and IoT. Additional areas where ITU-T had duplicated, or overlapped with, standards activities already underway within other SDOs are mobile power adaptors, which are currently being developed by ITU and the IEC³, smart cities, and climate change.

By way of background, both the ITU-T and the IEC are developing standards for mobile power adaptors. Many industry stakeholders have noted that IEC has substantial expertise in this area and question the value of ITU-T's initiative. It would be more constructive if ITU-T were to share its requirements and inputs with the IEC.

When addressing the Study Group 20 (SG 20) on IoT and its applications, ITU-T's SG-20 established its scope to be very broad and while we recognize that the scope statement represents the views desires of many of the ITU-T members, it is also important to recognize that many other SDOs have activities already underway within that space. It is important for these standards bodies to have open lines of communication to ensure that standards development occurs in an efficient and timely manner and meets the needs of the stakeholder communities. Additionally, the nature of smart cities is not a subject for applying a single, unified standard and there is a need for communication and dialogue amongst ISO, IEC, ITU-T, and other SDOs in this area. Thus, we would urge the U.S. delegation to the WTSA to advocate for changes within the ITU-T that will both enable better communication and coordination between ITU-T and other SDOs at all levels – secretariat staff, secretariat leadership, and experts involved in standards development.

In order to continue our forward-thinking perspective, the international standardization community must commit to communicating openly and working together, rather than in separate silos, towards standards solutions. There is no doubt that these industries will continue their meteoric growth, and of course each company may feel that different standardization approaches and venues are valid for its particular needs. But we hear one thing time and again: industry doesn't want to do the same work in multiple venues at multiple times.

This pain point is not only being experienced by U.S. stakeholders. The matter was also raised at recent meetings of the Pacific Area Standards Congress (PASC) and Pan American Standards Commission (COPANT), forums established to strengthen international standardization programs for the Asia Pacific and Americas region. During the recent April 2016 COPANT meeting and May 2016 PASC meeting, delegates spoke of the need for ISO, IEC, and ITU to strengthen communication and to avoid overlap and duplication of effort and initiatives whenever possible.

Keeping these examples in mind, the three organizations need and establish practical collaboration and harmonization. They need to avoid duplication, provide better information sharing, and provide early coordination of projects. ISO, IEC and ITU-T should recognize when a stronger competency exists in one

² The U.S. holds major leadership roles in JTC 1 and many of its subcommittees. ANSI holds the secretariat of JTC 1, and the U.S. also holds the chairmanship, which is currently filled by Karen Higginbottom of Hewlett Packard.

³ The U.S. National Committee (USNC) is the U.S. member body to the IEC; the USNC is an integrated committee of ANSI.

of the other organizations and should refer to that work instead of initiating a duplicative effort. ITU-T should focus on undertaking new initiatives where it has a strong competence and when competent work is not already occurring in ISO or IEC.

We also note that ITU-T, other standards organizations, and stakeholder communities would all also benefit from sharing information and best practices and working together to achieve common objectives relating to standards education. As an example, ISO and many ISO member bodies such as ANSI have expended significant efforts in developing resources and programs for standards education targeted for various stakeholder groups. Rather than each group attempting to develop its own program and target similar audiences, there is much benefit for the groups to identify areas where they can share resources and expertise.

Similarly, better cooperation between ITU-T/ITU-D and other standards organizations can help with information exchange and lessons learned about engaging developing and under-developed countries in standards development. Partnering and twinning programs in a number of standards organizations have led to a rich body of experiences about what works, what does not work, and factors that contribute to success.

ANSI membership would also like the U.S. delegation to WTSA to explore through collaborations with other member bodies means by which to address unilateral approaches often adopted by ITU-T. The incorrect belief among many member states to ITU-T is that as part of a UN specialized agency, ITU-T is hierarchically above other standards developing organizations. This stance is corrosive and inhibits the ability of other SDOs to work collaboratively with ITU-T.

One final suggestion is for the NTIA to continue to keep in close communication with ANSI regarding any next steps as a result of this call for comment as well as to keep policy information groups such as the DOC-ITA/USTR-led Industry Trade Advisory Committees (ITACs) informed. ANSI and its members have a strong presence at these meetings – many in leadership roles. The ITACs would be an obvious and valuable venue for progress and information sharing regarding this work with ITU-T.

ANSI strongly supports the National Telecommunications and Information Administration in working with ITU-T to address the various concerns mentioned above. The Department of Commerce provides a strong and helpful U.S. interest and additional expertise as a valuable resource to ANSI and its members. Thank you for this opportunity to provide comments.