



ICT Industry Comments on Proposed DOC-EU Standards Dialogue

The Information Technology Industry Council (ITI) hereby submits to the Office of European Union and Regional Affairs at U.S. Department of Commerce (DoC) comments on the Proposed DOC-EU Standards Dialogue.

ITI represents the top global providers of information technology (IT) products and services. ITI is the voice of the high-tech community, advocating policies that advance global leadership in technology and innovation, open access to new and emerging markets, support e-commerce expansion, protect consumer choice, and enhance the global competitiveness of its member companies. ITI welcomes this opportunity to provide comments on transatlantic matters that are critically important to the entire information technology sector.

ITI recognizes that standards and regulations are not only the domain of the technical and business communities. Policy makers in the U.S. and Europe are increasingly interested in and active on a range of standards and technical regulatory issues. We work cooperatively with policy makers in the U.S. and Europe to address critical policy matters and define appropriate roles.

ITI believes that the proposed DOC-EU Standards Dialogue could have a positive effect on standards issues related to the competitiveness of the global ICT industry. We believe the success of this Dialogue in achieving its stated objective of seeking cooperative approaches to standards-related issues to enhance transatlantic trade will depend largely on three factors

1. Structure
2. Participants
3. Issues

1. Dialogue Structure: To be effective, ITI believe that the Dialogue will need to distinguish itself from existing efforts existing within the US Government and at ANSI. ITI believes that there is an opportunity for this Dialogue to complement those other efforts. In addition, ITI would like to suggest that while a cross-sectoral dialogue is important, additional subsidiary sector dialogues might be an effective complement for some sectors. It would be useful to set up sectoral dialogues to gather issues, ideas, proposals and solutions which can be fed up the ladder to the larger, cross-sector discussions. Without a structured breakdown into sectors, the dialogue may become overwhelmed by the scope and magnitude of its mandate.

2. Dialogue Participants: If the objective is truly to enhance transatlantic trade, the dialogue must be market-driven. Industry must be a key participant on both sides of the Atlantic in terms of identifying topics and issues, discussing strategies, and implementing them. While the Dialogue will be a governmental initiative between the US Government and European Commission, there must be a commitment from the beginning to industry participation in all aspects of the Dialogue and both here in the US and in Europe.

3. Dialogue Issues: ITI agrees that the appropriate intent for this initiative would be for a positive dialogue on standards issues to enhance the transatlantic economic relationship. However, we believe that there is also an opportunity for this dialogue to discuss issues that can have an impact beyond the transatlantic relationship and benefit the global ICT sector and markets. We would like to suggest the following topics as possible items for the Dialogue to consider:
 - Leveraging a strong transatlantic relationship to engage China on a range of important standardization issues
 - Collaborating to develop a better understanding the global impact and value of standards and advocating for a market-driven approach to international standardization
 - Understanding critical environmental standards (e.g. new work at IEC) and their impact on transatlantic trade