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November 13, 2009

Via E-mail

The Honorable Bart Gordon

Chairman

House Committee on Science and Technology

Washington, DC 20515

Re: Inquiry Regarding Standards Development

Dear Mr. Chairman:

On behalf of the Alliance for Telecommunications Industry Solutions (ATIS), we appreciate the opportunity to provide input to your inquiry on the development and acceptance of standards and the impact of the current standards development process on U.S. competitiveness in the global marketplace. ATIS strongly believes that the existing voluntary, open and consensus-based standards development process plays a vital role in the competitive success of the information and communications technology (ICT) industry and our nation's economy.

Background on ATIS

ATIS is a global standards development and technical planning organization committed to providing leadership for, and the rapid development and promotion of worldwide technical and operations standards for information, entertainment and communications technologies using a pragmatic, flexible and open approach. ATIS is accredited by the American National Standards Institute (ANSI), a private, non-profit organization that administers and coordinates the U.S. voluntary standards and conformity assessment system.

ATIS' membership is diverse, including all stakeholders from the ICT industry – wireline and wireless service providers, equipment manufacturers, competitive local exchange carriers, data local exchange carriers, providers of commercial mobile radio services, broadband providers, software developers, consumer electronics companies, digital rights management companies, and internet service providers. Many of these companies are global in their reach. A number of federal agencies and local governmental authorities also actively participate in ATIS.

Nearly 600 industry subject matter experts from more than 250 ICT companies work collaboratively in ATIS' 18 open industry committees. The output of these committees include standards, technical specifications and requirements, best practices, interoperability testing, guidelines for the assignment of numbering resources, white papers, and technical analyses. The ATIS committees focus on a broad range of priorities for the ICT industry, including network architectures and platforms, the ordering and billing of services, E-911, cyber security, the reliability and interoperability of current and next generation technologies, the seamless delivery of converged wireline and wireless services such as IPTV over multimedia platforms, and the networks of the future. More detailed information regarding ATIS can be found at www.atis.org.

ATIS and its committees also actively engage in the larger global standards eco-system. ATIS is the largest U.S. contributor to the International Telecommunication Union Telecommunication Standardization Sector (ITU-T), a U.N.-based treaty organization that, among other things, establishes specifications that foster interconnection between communications systems. ATIS is a founding, organizational partner of the 3rd Generation Partnership Project (3GPP), which brings together six standards organizations from Asia, North America and Europe to develop mobile standards. ATIS also has numerous relationships, both formal and informal, with regional organizations from around the globe. These relationships engage and facilitate the important global dialogue on the development and adoption of standards.

In direct response to the specific questions you posed, ATIS provides the following input and perspectives:

1. How important are technical standards to companies like yours?

Voluntary, consensus-based standards are vitally important to the ICT industry. Standards foster innovation, facilitate interoperability, and advance technology and infrastructure development and deployment. With the ultimate objective of meeting the needs of users for new technologies and services, standards support the timely and cost-effective delivery of interoperable products and services to the marketplace – a marketplace that is now global. This is fundamental to the robustness of the U.S. economy and its competitive stance in the global marketplace.

There are numerous examples of standards developed by the ICT industry that have promoted the deployment of innovative technologies, transforming the way we live and contributing to the strength of the U.S. economy. Digital Subscriber Line (DSL) technology is one such example. This technology, which is based in part, on ATIS standards, created new opportunities for the high speed delivery of broadband and exciting, new applications.

The wide scale deployment of emerging and future technologies is also reliant on standards. Again, by way of example, Internet Protocol Television (IPTV) is transforming the way that consumers receive information and interact with both the television and the internet. The standards being developed in ATIS' IPTV

Interoperability Forum (IIF) are affording this new service and its supporting technologies, to be effectively deployed in response to marketplace demand. Importantly, ATIS' IPTV standards are being recognized and adopted on a global basis, and as such are providing U.S. leadership to an important new global service.

Further evidence of the value of standards can be found in the composition and role of ATIS' Board. Chief technology officers and senior industry executives from the leading service provider, manufacturing, network testing, IT, software, and consulting companies serve on the ATIS Board of Directors (see attached list). These industry leaders identify and define the industry's business needs and priorities to direct critical standards development in support of these priorities. ATIS believes that this engagement of senior executives provides compelling evidence of the importance of standards to the ICT industry. These executives would not commit the time, resources, and thought-leadership that is required if they did not greatly value standards and the role that standards play in the delivery of new products and services.

Finally, as a member-driven organization, ATIS believes that the diversity of its membership base, the level of standards activity, and the commitment of resources to its standards program provide additional indicators of the ICT sector's commitment to standards-based technologies, services and solutions.

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

ATIS does not believe that a comprehensive review of the standards-setting process or the system is worthwhile or necessary. ATIS maintains that the current processes that comprise the existing system work extremely well, promoting both innovation and economic development. The public/private partnership – government and industry – has repeatedly demonstrated its strengths and value.

First, the standards-setting process – both ATIS' own processes and the larger global, eco-system in which it participates – is typically under regular and active review by the industry that participates in it. The open and consensus-based nature of our standards development process and the larger global process, in which both public and private stakeholders have an opportunity to be heard, means that improvements and changes are constantly suggested and considered. The dynamic and organic nature of the process has to be responsive to ever-changing and evolving industry demands and needs. For example, ATIS has streamlined its own standards development processes to reflect that product development and deployment cycles have become shorter to accommodate the timely availability of increasing features and capabilities to address user needs.

ATIS has also re-focused its standards development processes to reflect the evolving ICT market. ATIS shifted from the paradigm of developing “standards for standards sake” to focusing on “standards for business sake.” It now means that standards are developed to support the business priorities of the members and the marketplace they serve.

Second, as you may know, standards-setting organizations participated in a survey by the Center for Global Standards Analysis just a short time ago. [The National Survey of United States Standardization Policies](#) asked for input regarding whether there was a need to change current United States policies for development of private-sector technology standards and if so what changes should be made. The results of this survey, published in August 2009, were virtually unanimous 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.” ATIS strongly agrees with this conclusion and believes that changes could disrupt the timely delivery of standards for those companies that comprise the ICT industry, a vital sector to our U.S. economy and the global marketplace.

Finally, the public/private partnership between the government and industry works well in the ICT sector. As we noted above, a significant number of federal government departments/agencies participate in ATIS forums and committees to develop relevant, implementable standards. This partnership is beneficial to all stakeholders and has been effective in developing key standards— particularly where the government actively contributes its subject matter experts to assist industry experts in addressing technical and operational challenges. One example of successful public/private cooperation involves the Commercial Mobile Alerting System (CMAS), which allows wireless service providers to send emergency alerts to customers’ wireless devices. Both private industry, working through ATIS and the Telecommunications Industry Association, and the government, including representatives from the Federal Communications Commission and Federal Emergency Management Agency, cooperated closely to expeditiously develop a standard needed to implement the CMAS system.

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

ATIS does not believe that an assessment of the international standards system is necessary. As noted above, the standards system is not stagnant, nor one cast in stone. Rather, it has been and continues to be dynamic in its approach to processes and requirements, particularly the recognition that business has become global. The system effectively accommodates the demanding and competitive marketplace. Thus, while the system may have been around for some time, it has been responsive to the realities of the evolving marketplace.

ATIS holds this view based on the fact that it is an active participant in global standards setting activities. The globalization of standards and a system that develops these standards has not negatively affected the ability of organizations to develop effective, implementable, and relevant standards. In fact, it has allowed opportunities for U.S. leadership. One such example is ATIS’ standardization of business priorities such as IPTV and next generation networks, especially within the ITU.

There are other examples where the “international system” is strong and robust. One such example is the 3rd Generation Partnership Project (3GPP), of which ATIS is a founding organizational partner and active contributor to 3GPP development of global mobile communications standards. ATIS is also a founding member of Global Standards Collaboration, an initiative of leading global ICT standards organizations that promote the global harmonization of communications standards. Both of these examples are part of this international system and provide successful examples of the global ICT industry achieving common and productive goals.

The key to the success of our current standards system and the larger global system – whether it is national or global in nature – lies in openness and equitable processes that ensure that both public and private stakeholders have the ability to be heard. ATIS believes that the current system has contributed to the timely deployment of new technologies worldwide.

4. As you know, the administration’s recent 60-day cybersecurity 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?

ATIS does not believe that a single federal coordinating point should be established for all technical standards. ATIS believes that the designation of a single point of contact could, in fact, negatively impact the robust and vibrant standards development system currently in place. Having to deal with one central coordinating point, rather than the subject matter experts in the appropriate departments/agencies could add needless bureaucracy to the process and make it more difficult to produce timely standards.

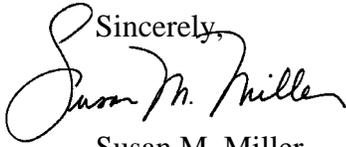
ATIS’ success in developing ICT standards is due to the direct and active participation of both private sector and governmental stakeholders in ATIS committees. The National Communication System, the Department of Defense, the Federal Bureau of Investigation, the Federal Communications Commission, and the Department of Commerce through its National Institute of Standards and Technology and National Telecommunications and Information Administration are all active members of ATIS and participate in ATIS standards development activities.

A new point of contact is also not necessary to coordinate the US government’s standards policy because such a coordinating group already exists – the Interagency Committee on Standards Policy (ICSP), under the coordination of the National Institute of Standards and Technology (NIST). ICSP brings together the Standards Officers of numerous federal agencies who discuss standards issues of interest and/or concern to these agencies, as well as addressing best practices on the part of federal agencies within the current standards process. ICSP participates in meetings of organizations such as ANSI to keep the standards development community informed of issues and to suggest improvements to the system. The ICSP is a working example of an effective public/private standards partnership.

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Finally, ATIS notes that the *National Technology Transfer and Advancement Act of 1995* (NTTAA) directs federal government agencies to use, wherever feasible, standards developed by private, voluntary consensus standards bodies in lieu of developing government-unique standards or regulations. ATIS believes that the approach taken by the NTTAA is appropriate and effective.

Again, ATIS appreciates the opportunity to provide input on this matter. If there are any questions regarding this matter or if we can provide additional information, please feel free to contact me or Thomas Goode, ATIS General Counsel, at tgoode@atis.org.

Sincerely,


Susan M. Miller
President and CEO

Attachment

cc: Lori Pepper