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Mr. Douglas Bell
Chair, Trade Policy Staff Committee
Office of the United States Trade Representative
600 17th Street, N.W.
Washington, DC 20508
USA

Reference: 78 FR 19566
               Docket USTR-2013-0019

Subject: Transatlantic Trade and Investment Partnership

Dear Mr. Bell:

In the recently reinvigorated negotiations around the Transatlantic Trade and Investment Partnership (TTIP) between US and EU, discussions of standards and regulatory convergence have begun to take center stage. In a text provided by the European Commission's Directorate General Enterprise and Industry (DG ENTR; "EU-US cooperation on standards: Additional information on difficulties perceived by the EU", Ref. Ares (2012)1540182 - 21/12/2012), it is stated that *"The problem is made even more acute by the global ambitions of some of the major ANSI-accredited SDOs. Whilst these produce US standards, they also claim to be "global" bodies that accept membership worldwide. This situation frequently brings them into direct competition with international standardisation activities in ISO and IEC."*

There are several misconceptions behind this statement and the perceptions that produce it. What is particularly difficult to understand is how in the era of challenges that can be addressed only at global level, the readiness to open the process of standardization of critical global platforms to a bottom-up, market driven, worldwide participation, without any limitations or pre-conditions, can be perceived as an "acute problem". One would think that mechanisms allowing the establishing of global standards through globally inclusive experts communities are rather part of an urgently needed solution. IEEE would therefore like to make the following contribution in support of this standardization paradigm and its impact on the global economy.

As the global community strives to keep pace with technology expansion and to anticipate the technological, societal and cultural implications of this expansion, and as it faces the increasing intersection of technology with economic, political and policy drivers, embracing a globally inclusive and market driven standards development paradigm will help ensure strong integration, interoperability and increased synergies along the innovation chain. Working within a framework of open participation and diversity, this paradigm espouses competition among

stakeholders to drive innovation and global market advancement, which evidently benefits humanity.

The globally inclusive, market driven standards approach has demonstrated agility—as conveyed in the development and deployment of the collection of standards for the Internet—and is driven by technical merit; and conveys the impact of bottom-up collaboration in harnessing global creativity and expertise to the standards of any technology space that underpin the modern economy. The approach results in the advancement of cutting-edge technology and empowers the rapid economic implementation of high-value, high-demand products and new services with societal benefits. It drives technical innovation via processes that endure direct, open participation that embrace different perspectives and interests to reach common goals. It produces standards, developed according to accepted World Trade Organization principles, without borders and without limits to help ensure a better future for ourselves and the generations that follow.

Working within a set of principles that advocates cooperation and openness; provides for global interoperability; serves as building blocks for further innovation; and contributes to the creation of global benefit for humanity, is core to unbounded market growth and success.

The successful development and evolution of the Internet exemplifies the strength of the bottom up, market driven system of standardization. The Internet evolved from a networking community to demonstrate packet switching technology to a global collection of communities and widespread information infrastructure that has resulted in today's e-commerce, information sharing and community operations. The standards on which the Internet was built (and continues to evolve upon and advance) were developed via a bottom-up, open and decentralized model that allows for diversity of opinions and approaches as well as flexibility to acknowledge and address change and varying needs. The process of developing these standards represents cross-organizational coordination and collaboration among IEEE, the Internet Engineering Task Force (IETF) and the World Wide Web Consortium (W3C). These organizations collectively established a suite of standards that forms the foundation for the Internet in markets around the globe. Together, these standards have been a key facilitator for the growth of a global economic and social model that has touched billions of lives. These global standards were developed with a focus toward technical excellence and deployed through collaboration of many participants from all around the world, precisely through the openness and non-discriminative nature of the process.

This distinct standardization paradigm is focused on voluntary standards, is decentralized, pluralistic, industry-led and based on following set of principles:
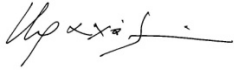- Respectful cooperation between standards organizations, whereby each respects the autonomy, integrity, processes and intellectual property rules of the others;
- Adherence to fundamental values of standards development, including due process, broad consensus, transparency, balance and openness;
- Collective empowerment to strive to develop standards that are chosen and defined based on technical merit, as judged by the contributed expertise of all participants; provide global interoperability, scalability, stability, and resiliency; enable global competition; serve as building blocks for further innovation; Availability, to help ensure standards specifications are made globally accessible to all for implementation and deployment, and that affirming

standards organizations have defined procedures to develop specifications that can be implemented under fair terms;

- Ensure standards are adopted voluntarily by the market and that their success is determined by the market.

IEEE believes therefore that the globally inclusive standardization processes that are based on these principles would not only serve the needs of the EU, the US and any other trade block but are moreover counteracting the emergence of dangerous mercantilist and techno-nationalistic approaches, while contributing to the creation of global benefits for humanity.

Sincerely,

Konstantinos Karachalios