Position Paper

**Comments on the European standardisation strategy 2020
as provided by CEN, CENELEC and ETSI**

„Strategic objectives for the European standardization system to 2020"

page 1

The Federal Association for Information Technology, Telecommunications and New Media (BITKOM) represents more than 1,700 companies in Germany. Its 1,200 direct members generate an annual sales volume of 135 billion Euros annually and employ 700,000 people. They include providers of software and IT services, telecommunications and Internet services, manufacturers of hardware and consumer electronics, and digital media businesses. BITKOM campaigns in particular for a modernization of the education system, for an innovative economic policy and a future-oriented Internet policy.

We very much appreciate the opportunity of providing comments on the draft European Standardisation Strategy 2020. We support the effort taken by the ESO's to define a strategic roadmap for this decade in order to achieve best-of-class results from European standardisation and to provide platforms for standards development that meet the needs of industry and other stakeholders and are competitive, modern and efficient.

We have structured our comments along the document structure as originally provided:

1 Comments on the CEN-CENELEC-ETSI "Strategic objectives for the European standardization system to 2020" (page 1 of the overall document)

General comment

We believe that the bulleted list at the beginning paints a very negative picture of European standardisation today. Currently the entire section can be misread as a self-diagnosis that the current system does not perform well – i.e. does not already provide the results as given in the bullet items. This gives a very strange impression on European standardisation. The paper should avoid the impression that the strategic goals will not be achieved before the year 2020.

We suggest a review of the section including a different introduction to the bulleted list. The introductory sentence, for instance, could be drafted the following way: "The European standardisation system provides an attractive, flexible and competitive environment to all interested parties for high-quality standards development and promotes the voluntary uptake of standards in Europe. Building on its long-term expertise, the European standards bodies will further and regularly review their processes and procedures so that the system will remain best-of-class and will continue to [the bulleted list follows]".

Federal Association
for Information Technology,
Telecommunications and
New Media

Albrechtstr. 10 A
10117 Berlin-Mitte
Germany
Tel.: +49.30.27576-0
Fax: +49.30.27576-400
bitkom@bitkom.org
www.bitkom.org

Contact
Christian Herzog
Head of Dept.
Technical Regulations &
Market Access
Tel.: +49.30.27576-270
Fax: +49.30.27576-409
c.herzog@bitkom.org

President
Prof. Dieter Kempf

Management
Dr. Bernhard Rohleder

Add the aspect of voluntary uptake to the bulleted list

We propose to add the aspect that standardisation is voluntary. This is a key element of European standardisation and of its success.

Add bullet item on user and consumer demand and user and consumer benefit

We propose to add a bullet item like: "capture demand and requirements from users and consumers as well as user and consumer benefit".

Add bullet item on the role of National Bodies

We propose to include the aspect of the close linkage of the European system to National Bodies and, therefore, to requirements gathering on the national level as well as participation and representation of specific national interests – especially in the context of the development of harmonised standards.

Add bullet item on collaboration with global standards bodies

There are major new areas in European standardisation that require collaboration across organisational and regional boundaries and beyond the structures of formal standardisation. Many of the topic areas dealt with in systems standardisation are prime examples in this respect. Therefore, a bullet item should be added stressing the need to provide effective processes and mechanisms for collaboration with global fora and consortia.

Signatories

Only the three ESOs should be signatories to this document.

2 Comments on the "CEN and CENELEC's ambitions for 2020"

Section on Global Influence over-stresses the role of the ESOs in International Standardisation

The ESO's primary role is to ensure the provision of standards in support of the European harmonised market. The international dimension, successfully manifested via the Dresden and Vienna agreements, is an important aspect but not the prime objective of the ESOs. Participation in international standardisation is done via the National Bodies which are the direct members of ISO and IEC. The section on "Global Influence" should avoid any notion that could be (mis)read such that Europe is primarily represented via CEN and CENELEC on the international level. We suggest that the entire section is carefully reviewed in this

light. It may be adequate to move this section after the section on the "Regional Relevance" of CEN and CENELEC.

Comment on the section "Regional Relevance"

We suggest the following addition to the third paragraph (proposed additions marked in italics):

"European standardization will be a vital component of market harmonisation for services, as it is for goods, by removing trade barriers and cutting compliance costs. *Consistency with International standards and adopting International standards whenever possible will be a high-priority objective in this context.* European and International standards will be used as the reference for conformity assessment and legitimate access to markets."

Comment on the section "Wider recognition – By standards users"

The term "user" should be defined to avoid confusion.

Comment on the section "Innovation and Growth"

The section addresses well the aspect of transfer of innovative results from R&D into standardisation and the role of CEN and CENELEC here is, indeed, important. However, it may be questioned whether going directly from research to standardisation is always a good idea or whether some step of technology adoption should be included in some way.

Moreover, much more often innovation takes place on the level of implementation of a standard. Therefore, CEN and CENELEC should add the aspect of providing proper processes to make standards available for innovation, promote their uptake and support innovation through the integration of technologies and combination of standards, e.g. in systemic standardisation. This should be added to the section.

Add a section on processes and the use of modern ICT technologies for collaboration

We propose to add a section addressing the following aspect: Further improve collaboration by using modern ICT technologies for joint remote work and for sharing information, making information available to the interested public and for gathering requirements and input to standardisation activities and projects. This will further increase transparency and broaden the basis for participation in standardisation by providing additional input and communication channels.

We hope that these comments are helpful for consideration by CEN, CENELEC and ETSI for the further improvement of the European Standardisation Strategy. We shall be ready for providing clarifications and for further discussion.