**Comments In the matter of Transatlantic Trade and Investment Partnership (TTIP)**

**(USTR-2013-0019)**

**10 May 2013**


It has come to our attention that, in the negotiations around the Transatlantic Trade and Investment Partnership (TTIP) between the United States Government and the European Commission, discussions of standards and regulatory convergence have begun to take center stage.   We wanted to use this opportunity to draw your attention to a recent statement by our organizations affirming the importance of a jointly developed set of principles establishing a modern paradigm for global, open standards.  In our view, any forward-looking standards effort should fully take into account the highly successful model of standards development that has driven the growth and expansion of one of the world's most important technologies.
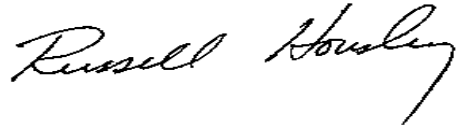
The shared "OpenStand" principles—based on the effective and efficient standardization processes that have made the Internet and Web the premiere platforms for innovation and borderless commerce—reflect the need for global standards to foster competition and cooperation, support innovation and interoperability and drive market success.   We have attached the principles for your consideration.  You may find more information about this initiative at: http://open-stand.org/.

As the global community strives to keep pace with technology expansion and to anticipate the technological, societal and cultural implications of this expansion, 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, all benefiting humanity.
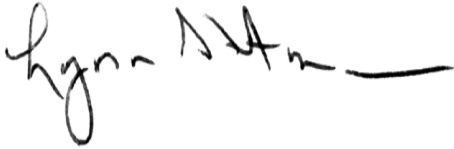
From the vantage point of global organizations operating at the cutting edge of technology, we believe that the OpenStand model will continue to drive the pace of technology development for years to come.  In light of that, we hope that, as your discussions and efforts to strengthen cooperation in the standards arena move forward, you will take full account of the OpenStand principles and reflect these concepts in any future standards framework.   We stand ready to work with you in this regard and to be a resource for policymakers as you map out a course for strengthening US-EU cooperation on standards.


Attachment:  OpenStand Principles

Signed,

Russ Housley, Chair of the Internet Architecture Board

Lynn St Amour, CEO, Internet Society

Dr. Ing. Konstantinos Karachalios, Managing Director IEEE Standards Association

Dr. Jeff Jaffe, CEO, World Wide Web Consortium

**The Modern Paradigm for Standards is shaped by adherence to the following five principles:**

**1. Cooperation**
Respectful cooperation between standards organizations, whereby each respects the autonomy, integrity, processes, and intellectual property rules of the others.

**2. Adherence to Principles**
Adherence to the five fundamental principles of standards development:

- **Due process.** Decisions are made with equity and fairness among participants. No one party dominates or guides standards development. Standards processes are transparent and opportunities exist to appeal decisions. Processes for periodic standards review and updating are well defined.
- **Broad consensus.** Processes allow for all views to be considered and addressed, such that agreement can be found across a range of interests.
- **Transparency.** Standards organizations provide advance public notice of proposed standards development activities, the scope of work to be undertaken, and conditions for participation. Easily accessible records of decisions and the materials used in reaching those decisions are provided. Public comment periods are provided before final standards approval and adoption.
- **Balance.** Standards activities are not exclusively dominated by any particular person, company or interest group.
- **Openness.** Standards processes are open to all interested and informed parties.

**3. Collective Empowerment**
Commitment by affirming standards organizations and their participants to collective empowerment by striving for standards that:
- are chosen and defined based on technical merit, as judged by the contributed expertise of each participant;
- provide global interoperability, scalability, stability, and resiliency;
- enable global competition;
- serve as building blocks for further innovation; and
- contribute to the creation of global communities, benefiting humanity.

**4. Availability**
Standards specifications are made accessible to all for implementation and deployment. Affirming standards organizations have defined procedures to develop specifications that can be implemented under fair terms. Given market diversity, fair terms may vary from royalty-free to fair, reasonable, and non-discriminatory terms (FRAND).

**5. Voluntary Adoption**
Standards are voluntarily adopted and success is determined by the market.