



17 March 2022

Representative Haley Stevens, Chair
Subcommittee on Research & Technology
House Committee on Science
Washington, DC 20515

Representative Randy Feenstra, Ranking Member
Subcommittee on Research & Technology
House Committee on Science
Washington, DC 20515

Dear Rep. Stevens and Rep. Feenstra,

Thank you for the opportunity to provide input related to the Subcommittee's March 17th hearing on the role of standards in society, innovation, and U.S. competitiveness. IEEE, as a leading global standards developer, appreciates the opportunity to discuss the standardization process and concerns raised about that process. Relative to the testimony and discussion at this hearing, it is important to remember that technical standards are developed by several types of global standards developing bodies, each with their own rules and procedures. Many private standards bodies, IEEE included, operate under rigorous governance rules that reflect private-sector-led, voluntary, open-participation, and consensus-based principles. The protections from inappropriate influence afforded to properly managed standards processes need to be considered when discussing systemic reforms.

The U.S. has for decades consistently, and in our opinion appropriately, promoted the principles of consensus-based standards as the basis for successful international standardization; these principles have contributed greatly to advancing U.S. innovations and technological competitiveness. This global model has become a vital component of the international standardization ecosystem. It is supported by many countries and organizations as it provides equal access to standards setting regardless of nationality or geopolitical constraints. Embracing these principles moves standardization toward an environment in which companies can compete fairly and succeed world-wide.

Established rules and processes ensure a level playing field in international standards development. Properly structured governance systems are transparent, flexible, and responsive to identified issues to maintain fairness. These rules and systems are necessary to produce timely, robust, and market relevant standards that meet the needs of stakeholders. Further, operational flexibility within standards bodies contributes to the success of the American approach and the global standardization system in general. We encourage the federal government to continue to engage actively and effectively with standards setting bodies as a means of strengthening this success.

We also encourage investments to help support actors, especially small and medium sized businesses, who may not have the budget and staffing to fully engage in standards development activities. Enabling access for underrepresented actors will increase the diversity of voices and encourage innovative ideas and approaches. Increased participation will also democratize the standards development process, thus strengthening the open markets in which the U.S. is highly competitive. The alternative is limited participation in standards development and thus a decreased ability of U.S. businesses to participate in the innovation economy.

The U.S. should continue to lead discussions on global technical standardization, including discussions on pre-standardization or early-stage standards relative to emerging technologies, noting that standards are critical to innovation, commercialization, market development and competitiveness. Efforts to foster productive and impactful partnerships, increase diversity in participation, and encourage open information-sharing are critical to ensuring the integrity and continued success of the open, merit-based, market-driven process.

IEEE-USA represents the US-based membership of the IEEE (Institute of Electrical and Electronics Engineers), the world's largest technical professional society. These professionals work in all sectors of our 21st century technology-based society, from space exploration to biotech, cryptocurrency to power generation. The IEEE Standards Association is one of the world's largest global standard setting bodies with a catalog of over 1,000 active standards, including many at the heart of our modern economy. If you have any questions, please do not hesitate to contact Erica Wissolik at (202) 530-8347 or e.wissolik@ieee.org.

Sincerely,

A handwritten signature in cursive script that reads "Rebecca Taylor".

Rebecca Taylor
Vice President
IEEE-USA Government Relations