



4 May 2022

Senator Maria Cantwell, Chair
U.S. Senate Committee on Commerce, Science and Transportation
Washington DC, 20510

Re: The Senate amendment to H.R. 4512, America COMPETES Act

Dear Chair Cantwell,

IEEE-USA fully supports the workforce, technology transfer, and research provisions of the United States Innovation and Competition Act of 2021 (USICA) and has worked with Senator Schumer in both this Congress and the last to support this much needed bill bolstering science and technology research. As the COMPETES conference begins, we ask that you support the inclusion of a provision found in the House version of H.R. 4521 that would support small businesses who wish to participate in the development of technical standards.

IEEE-USA agrees with the Senate, as included in USICA, that standards development should adhere to the principles of openness, transparency, due process, and consensus. We also agree with the Senate language calling for federal support and assistance to enable the private sector to engage and participate in standards development activities. The Senate amendment states, “As emerging technologies develop..., it is critical that the United States and its allies continue to participate in the development of standards, ...” However, the Senate language stops short of providing funding to small businesses to achieve these objectives.

H.R. 4512 (The America COMPETES Act) implements a recommendation of the Final Report of the National Security Commission on Artificial Intelligence (NSCAI) that called for the establishment of a coordinated grant program between NIST and the Small Business Administration. The proposal assists US businesses with the high costs of participating in standards development, including conducting relevant research, developing requisite skills and expertise, preparing standards proposals, and attending technical standards-setting meetings.

We believe that by providing access for American small and medium sized entities – voices that may not participate due to the burdensome but necessary investments – to a standards working group, Congress will likely improve the quality of the ensuing standards. Giving small businesses a voice in global standards organizations encourages innovation, promotes economic competitiveness, and creates high-value jobs in the United States. The alternative is limited US participation in standards development and thus a decreasing ability of small businesses to participate in the innovation economy.

As the NSCAI noted, the United States and its allies should lead the discussion of development of global technical standardization and “clarify objectives for technical standards ... that foster economic growth, protect consumers, and safeguard democratic values.” Partnerships, global and diverse participation, and information-sharing are critical to ensure “the neutrality of international standards-setting bodies.” By encouraging these non-traditional players to participate, you increase the diversity of voices and

democratize the standards development process, thus strengthening the open markets in which the US is highly competitive.

IEEE-USA, the Washington office of IEEE, Inc., the world's largest technical organization and a standards developer, represents the approximately 150,000 IEEE members working as engineers, scientists, and allied professionals in the US. Our members work in all sectors of the US economy including government, academia, and businesses from large multinationals to the latest small startups.

We appreciate the opportunity to provide input. Should you have any questions or wish to discuss these comments further, please do not hesitate to contact Erica Wissolik at (202) 530-8347 or e.wissolik@ieee.org.

Sincerely,

A handwritten signature in black ink that reads "Deborah L. Cooper". The signature is written in a cursive style with a large, stylized initial 'D'.

Deborah Cooper
IEEE-USA President

CC:
Ranking Member Roger Wicker, U.S. Senate Committee on Commerce, Science, and Transportation