



Dr. Laurie Locascio
Under Secretary of Commerce for Standards and Technology
National Institute of Standards and Technology
Gaithersburg, MD

Dear Dr. Locascio,

We, the undersigned, are U.S. stakeholder organizations representing a broad cross section of industry and technology sectors, including critical and emerging technologies. We have a strong and vested interest in a vibrant and successful standards system that contributes to U.S. technological leadership. We and our members and stakeholders participate in hundreds of standards developing activities in a broad range of standards organizations around the world.

We welcome the opportunity to provide feedback on the draft Roadmap and appreciate the open and inclusive process that NIST, as the implementer, followed in seeking stakeholder input after the release of the USG NSSCET.

While we are pleased to see the Roadmap acknowledge the private sector-led nature of the U.S. standards system, we are concerned that statements in the draft Roadmap contradict the U.S. government's commitment to this proven system, for example by calling for shared public and private sector leadership. This may inadvertently weaken the very system that the strategy and roadmap seek to strengthen. We write today with the purpose of reinforcing the effectiveness of the private sector-led system, and urge you to meet with ANSI and private-sector stakeholders to discuss and address these concerns, preferably prior to releasing the final Roadmap.

Even within critical and emerging technologies, the U.S. approach to standards includes a range of standards organizations with different models for standards development, different needs, and varying dynamics. The draft Roadmap fails to recognize these distinctions, which constitute an important feature that directly contributes to the strength of our system. It generalizes issues, challenges, and potential actions that might be appropriate for very specific issues limited to specific organizations, and applies them to all standards forums.

We are also concerned about mixed messages in the Roadmap that appear to indicate the U.S. government is undertaking activities that are duplicative of what the private sector is already successfully undertaking, for example calling for the U.S. government to deepen cooperation with allies and partners on standards governance and development. The roadmap does not describe how increased government activities will be coordinated with the private sector; lack of sufficient coordination could result in conflicts that diminish U.S. leadership in standardization. This concern is further heightened as many of the proposed activities and outcomes require significant and long-term budgetary investments by the U.S. government. Furthermore, the Roadmap does not address the allocation of responsibilities—that is, which U.S. government agency will lead on which outcome/action—raising uncertainty for the private sector and questions about accountability and leadership.

Finally, the Roadmap emphasizes the intent to work with likeminded partners to maintain the integrity of the international standards development processes, yet there is no discussion of how the U.S. government will address actions by allies and partner governments that disproportionately disadvantage U.S. stakeholders in international standards activities or undermine international standards processes.

The public-private partnership model is key to the success of the private sector-led U.S. approach to standards. In the spirit of this partnership, we look forward to working with you to address our concerns with the draft Roadmap, and in shaping the Roadmap to be a useful tool for the U.S. government's engagement in standards.

Sincerely,

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