



Mr Costas Andropoulos  
Head of Unit  
ICT for Competitiveness and Innovation  
DG Enterprise and Industry  
European Commission  
200, rue de la Loi  
1049 Brussels

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Dear Mr Andropoulos,

BUSINESSEUROPE welcomes the White Paper: "Modernising ICT Standardisation in the EU – The Way Forward".

ICT tools are used across just about all industry sectors and are essential for providing effective and coordinated public services by authorities both at Community and Member State level.

Europe runs the danger of lagging behind in ICT innovation relative to its share in the global economy as the point of gravity has shifted to North America. Therefore ICT standardisation policy is an important element to ensure continued European growth and prosperity.

While the ICT domain has certain specificities that justify dedicated features of its standardisation framework, its wide cross-sectoral interaction with products and services underlines the necessity to see the development of ICT standards as an integral part of standardisation activities in general. The application of special measures for ICT standardisation to the ICT dimension of other sectors and industries therefore must be done with wisdom, taking advantage of ICT related provisions where appropriate but leaving the organisation of non-ICT standardisation to the general standardisation system. In this context, we would like to emphasise that the reform steps proposed in the White Paper should be strictly limited to the ICT domain and should not be transferred to the general framework for European standardisation.

With regard to the European Commission's current work in the framework of the Expert Panel for the Review of the European Standardisation System (EXPRESS), BUSINESSEUROPE has highlighted some key issues in its position paper dated 2 June 2009. This includes comments relating to ICT standardisation some of which touch upon specific suggestions made in the White Paper (e.g. on the possible revision of the legal framework). We send you a copy at annex for your consideration.



Global interoperability and trade are key priorities for industry, and especially so for the ICT sector which includes big global players and operates on global markets. Therefore the objective must be to develop and use global standards whenever possible.

Many ICT standards stem from industry-driven organisations. It is therefore of major importance to ensure close cooperation with industry, including the establishment of partnerships with industry fora developing ICT standards, when defining future strategies and priorities for the ICT sector.

Likewise it can be beneficial to facilitate the referencing of consortia standards by public policies for certain purposes and under a series of conditions to avoid abuse and ensure coherence of the standardisation system. However, to preserve the respect for the European regulatory framework and legislation we strongly believe that standards with immediate regulatory implications - such as those referred to by EU Directives in relation to presumption of conformity to essential requirements – continue to be developed or vetted by the formal European Standardisation Organisations.

Last but not least we welcome the suggestion to improve the links with research and development institutes to optimise ICT innovation and develop standards for the future.

We look forward to further cooperation with you.

Yours sincerely,

Jérôme P. Chauvin  
Director  
Legal Affairs Department  
Internal Market Department