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Mr. Patrick Gallagher
Director
National Institute of Standards and Technology
100 Bureau Drive, Stop 1070
Gaithersburg, MD 20899-1070

Re: Docket No. 0909100442-0563-02 – Effectiveness of Federal Agency Participation in Standardization in Select Technology Sectors for National Science and Technology Council's Sub-Committee on Standardization

Dear Mr. Gallagher:

AT&T Inc., on behalf of itself and its affiliates, welcomes the opportunity to respond to the National Institute of Standards and Technology request for comments and provide our perspective on our participation with federal agencies in certain standards setting efforts and how future standardization efforts may be improved. As discussed in greater detail below AT&T generally has been pleased with our experience with federal agency participation in the standards setting process. We believe that any successful federal agency standardization effort must start with the federal agency accurately framing the issue at the outset. This is even more important in areas involving complex technical issues and where the technology issue or sector involves a multitude of interested parties or stakeholders. Accurately identifying the issue and narrowing the focus will ensure the parties' time and resources are properly expended. Equally important to the federal agency defining the issue it is imperative, as the standardization process moves forward, that the actual standards develop from the consensus from the private-sector participants. These two recommendations are discussed more fully below within the context of our actual recent experiences in standardization efforts.

In AT&T's experience, the standard setting process works best and most efficiently if government participants conduct themselves as stakeholders in the process and remain closely engaged throughout it. There are certain steps that federal agencies can take to help ensure that a standards process runs smoothly and efficiently. First, relevant agencies should actively participate in industry discussions about a standard and should be prepared to effectively make

the case for why a standard should address a particular capability or functionality and make clear the relative priorities as proposed by the agency. As a stakeholder in the standards process, it is important that government agencies frame, from their perspective, the issue that a standard will help to address. Agencies should give special care to this part of the task. Accurately describing a problem and giving the full breadth of information that an agency has on the issue is the first step toward effective standard setting. So, for example, if an agency sees the likelihood of new regulations or government system configurations affecting the issue, it is important for those working on the standard to fully appreciate the likely contours of the new rules or other agency requirements. Similarly, in areas like emergency communications, where the government, by virtue of its role, has unique requirements that a standard must likely meet, it is crucial that those be communicated, throughout the process, to the private sector entities working on the standard.

Second, in most cases, the agency should not position itself to dictate or veto the content of a standard. The government's needs, while important, should not crowd out the needs of the private sector participants. Rather, consistent with the National Technology Transfer and Advancement Act of 1995,[1] the agency, after framing the issue and the need for the standard, should let the private-sector participants lead on developing the actual content of the standard. Standards proceedings should essentially be driven by consensus among the private-sector entities involved. While the process undeniably gains much from federal participation, a participating agency should limit itself to accurately phrasing the need for a standard, convening a discussion among the relevant entities and contributing appropriate technical expertise. The agency, however, should not attempt to pick winners or losers nor give the impression it is by dictating the outcome or choosing an appropriate standard. Consumers and other industry stakeholders will be much better served if these decisions are left to industry consensus and the competitive market.

In this regard, AT&T's participation in developing standards for the Commercial Mobile Alert System (CMAS)[2] provides a fine example of effective and appropriate participation by government stakeholders. This initiative developed standards for the interface from the Federal Government Alert Gateway to the Commercial Mobile Service Provider gateway. The Department of Homeland Security's (DHS) Science & Technology Directorate and Federal Emergency Management Agency (FEMA) both participated in the process. Through a close

[1] P.L. No. 104-113 (1995).
[2] *Joint ATIS/TIA CMAS Federal Alert Gateway to CMSP Gateway Interface Specification*, ATIS J-STD-101.

public-private partnership, the group successfully created standards and testing specifications. Throughout the process, DHS and FEMA had full opportunity for participation and contribution with other stakeholders, but private industry was the main driver. Private industry chaired the effort and the initiative used the framework of industry standards development.

Another recent and relevant experience centers on Smart Grid standards, for which AT&T participated in two standards initiatives: the Framework and Roadmap for Smart Grid Interoperability[3] and Smart Grid Cyber Security Strategy and Requirements.[4] These two standardization processes illustrate the challenges posed by setting standards for complex technological systems like the Smart Grid. Such large systems, by their nature, present numerous problems for which standards are needed. With this abundance of issues or problems comes a wide variety of entities potentially interested in participating in standards development. The combination of numerous issues and interested parties can lead to an ungainly and unproductive process if it is not carefully managed.

AT&T submits that the key to success in these complex standards proceedings is the proper framing of the issue by the federal agency at the outset and, if necessary, subdividing issues into narrower categories, which hopefully will be of interest to a narrower subset of the entities participating in the overall effort. These subgroups should contain fewer members, who in turn have greater expertise on the relevant issues. The smaller subgroups can move more expeditiously to frame the particular issue for which a standard or standard adaption is needed. The relevant private standard setting organization, in consultation with government and industry stakeholders, can then move forward, using its regular procedures, to receive additional input and finalize a consensus standard. This was, essentially, how the process worked in the Framework and Roadmap for Smart Grid Interoperability standardization process that NIST participated in over the course of 2009 and 2010.

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[3] *NIST Framework and Roadmap for Smart Grid Interoperability Standards*, Release 1.0, NIST Special Publication 1108, January 2010, http://www.nist.gov/public_affairs/releases/upload/smartgrid_interoperability_final.pdf

[4] Public Notice, Comments Sought on Draft NISTIR 7628, *Smart Grid Cyber Security Strategy and Requirements*, Docket No. 0909301329-91332-01 (rel. Oct. 9, 2009).

Looking forward, AT&T expects that there will be numerous opportunities for continued public-private collaboration on standards. As government and private industry move more and more of their operations to the cloud, new standards will continue to be necessary to ensure cyber security and interoperability among different providers' platforms. The migration toward cloud services will also place a premium on identity management and secure transactions; these areas will similarly require close cooperation on standards among the various stakeholders. Finally, the Smart Grid likely will continue to evolve and incorporate new technologies for which additional standards work will also be necessary.

AT&T appreciates the opportunity to present these comments and looks forward to the collaboration opportunities that all of these standards areas will require in the coming months and years.

Sincerely,

/s/

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