HM Government

UK Government Response to EU public consultation on Standards in the Digital Single Market

Setting priorities and ensuring delivery

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This is the United Kingdom Government response to the consultation on ICT standardisation in the DSM. We have also submitted comments on the of the paper prepared by the ICT Multi Stakeholder Platform (MSP) for the Priority Plan, which are in line with the comments and principles given in this consultation response. We recognise that the final paper is the product of a Task Force of Member States and Standards Developing Organisations and is thus to some extent a compromise of views. UK officials have played an active part in the Task Force and we are thus generally satisfied that it takes into account our views.

We understand that this document will now be considered alongside views from the public consultation from which the Commission will then produce the final Priority Plan. In developing the Plan further, the UK wishes to advocate the following approach, which we believe represents a good model for the public sector approach to ICT standards work:

- Standardisation should be led by the market rather than the Commission and other public sector organisations. With new technologies, we must consider the risk of pre-empting the market by attempting to create standards too early.

- The role of government is to provide an environment where standards can be effectively implemented and coordinated, providing leadership where necessary. Intervention by a public authority should only take place in cases where a specific need has been identified.

- The Commission is well placed to coordinate standard setting by the various Standard Developing Organisations active in Europe, identify priority areas for standardisation and stimulate cooperative activity between the organisations.

- ICT standards are by their very nature global, so the Commission should look to provide the environment through which opportunities can be created for European businesses to influence globally used standards. While preventing market fragmentation, future work should take care not to duplicate existing standards. They should focus instead on the mapping and maturing of existing standards, alongside relevant new standards, in response to use cases and real needs.

- ICT standards have the potential to improve compatibility and interoperability across domains and industries, which in turn improves user experience, helps smaller providers scale-up, and fosters adoption of new technology. The Commission can support this by promoting and recognising standards that

emerge from industry at the EU level. These should reflect the voluntary nature of standards use and not be mandatory, so as not to stifle innovation.

- We support the Commission's aim to deliver government services that interoperate and avoid lock in to a specific supplier or technology through the use of standards. We should achieve this through cooperation and consensus, not regulation: mandating standards for public procurement should not be used as a mechanism purely to encourage adoption of ICT standards across Europe.

Whilst recognising that all the areas outlined in the consultation are important areas for development in European industry, we endorse the five areas arising from the MSP discussions to be those most suitable for standards work at this time, ie 5G, Internet of Things, Cloud, Cyber security and Digitisation of Manufacturing. We believe that 5 topics is an adequate number to consider at this time and it would be difficult to focus on a larger number. However if further topics are added, we would suggest Connected and Autonomous Vehicles (CCAV) alongside Intelligent Transport Systems (ITS) and also eHealth.

We note however that all these areas as well as the others initially considered are not homogeneous – they overlap and interact extensively with each other. So in promoting one area we need to be cognisant of the effects on other analogous areas.

In preparing the Priority Plan we would like to advocate the following positions with respect to the areas below:

- eHealth – we would wish to see a range of SDOs working together on generic solutions in this area. In particular we would wish for SNOMED-CT to be adopted as the language of e-health interoperability.

- Cyber Security – we need to ensure that standards are available that adequately reflect European and Member States requirements.

- Connected and Autonomous Vehicles – we are very keen to ensure that there is support for the development of appropriate standards that will inform the safe and timely development and deployment of Connected and Autonomous Vehicles technologies and to work with the EC and EU MS to ensure International cooperation and adoption. To this end, the UK is currently mapping the standards landscape for CAV technologies to identify where it can usefully develop standards for key parts of the operating systems for autonomous and connected vehicles and for related enabling technologies.

- Digital Inclusion – we believe that this area is already adequately covered by suitable standards.

The United Kingdom therefore endorses the main suggestions of the MSP proposals for the Priority Plan and would ask the Commission to take forward the final Plan along the lines proposed in this response. In cases where standards are to be developed, this should be carried out openly, based on collaboration, transparency, due process, fair access and use, and market support.