

December 5, 2021

Mr. David F. Alderman
Standards Services Division
National Institute of Standards and Technology

Subject: NIST–2021–0006, Study on People’s Republic of China (PRC) Policies and Influence in the Development of International Standards for Emerging Technologies

Dear Mr. Alderman,

The following comments are in response to the November 4, 2021, Federal Register notification (Vol. 86, No. 211, p. 60801-60802) inviting public comment on People’s Republic of China (PRC) policies and influence in the development of international standards for emerging technologies.

Comment 1

Given that the “China Standards 2035” plan that is in part a focus of this effort was issued (October 10, 2021) prior to the publication of this notice, it is disappointing that a quality English translation of that document was not included in the associated docket.

Comment 2

I believe many Standard Development Organizations (SDOs) had to shift from in-person to virtual meetings due to COVID-19 to continue their standard development processes. My own perception is that such virtual meetings may have allowed for expanded participation in the process. As there may be the opportunity to again have in-person meetings there is likewise also the opportunity for standard development organizations to continue providing the opportunity for virtual participation in the standard development process through platforms (e.g. Zoom) that are currently available and would likely continue to improve. Such expanded participation in the standard development process would seem to strengthen the standard development process and allow for greater resistance to the efforts by any one country to dominate the process. It would be my hope that the NIST Standards Coordination Office would work with and support SDO efforts to provide effective means for continued virtual participation in the standards development process.

Comment 3

I would like to encourage consideration of expanding the NIST Standards Services Curricula Development Cooperative Agreement (SSCD CAP) Program. I think this is an excellent manner of strengthening the pipeline for future US participation in the standards development process. I also would encourage NIST to promote this program to the Interagency Committee on Standards Policy to encourage other federal agencies to launch similar efforts.

Comment 4

The International Organization for Standardization (ISO) is the only SDO specifically mentioned in the “China Standards 2035” document. I participate at a low level in the efforts of two ISO Technical Committees (TCs) and their associated Subcommittees (SCs) and Task Groups (TGs) through the American National Standards Institute (ANSI) and ASTM International. I’m aware the cost of such participation is expected to increase significantly in the next few years as the effort necessary to ensure that ASTM and ANSI meet the full requirements for participation in ISO increases. So I’m concerned that against the potential of increased PRC participation in ISO we may see a decreased level of US participation in at least some TCs as a result. I believe there should be some consideration of how the US government can support the cost of US participation in ISO and other SDOs.

Comment 5

Through my limited ISO TC participation, I’m also aware that one manner of showing leadership in the ISO system is to host periodic in-person TC meetings. For both of the ISO TCs I participate in there has been interest in United States (US) hosting of a TC meeting but obvious fiscal constraints on doing so. While it would likely be possible to obtain sponsorships from some US commercial and other organizations in the immediate time frame of the US hosted meeting to help defray at least a portion of that cost, it is difficult to predict several years out when it is necessary to commit to the hosting of a TC meeting. So there should be some consideration of the potential for US government support of hosting such ISO TC meetings in the US as a clear expression of US leadership in the development of international consensus standards.

Comment 6

In the specific case of ISO there is the important role of convenors and secretariats in the work of its TCs, SCs, and TGs. Such convenors and secretariats likely representing the entire breadth of those countries participating in ISO. In terms of monitoring US leadership and participation in ISO, I’m not sure if statistics on the nationality of ISO convenors and secretariats are compiled and trended? Same for the level for US membership in same. And along the lines of my previous comments, the frequency of US hosted ISO meetings?

Comment 7

I know that my comments above clearly miss the primary objective of PRC “policies and influence in the development of international standards for emerging technologies”. However, while I think how the PRC may specifically intend to influence international standards for emerging technologies may be currently unclear, the US government should use the issuance of the “China Standards 2035” plan as an opportunity to take a more strategic view of the importance of US participation in SDOs and how US leadership and participation can be supported. And while some of my comments are specific to ISO, I believe it important to look across our entire system of SDOs. For example, I’m personally much more active in standards development activities through ASTM International. I believe that the historic performance of ASTM International and other similar SDOs speaks well to the ability of US participants to

develop international consensus standards of great value and we should ensure that there is clear US government support for their continued success.

Thank you for the opportunity to provide my personal comments on this important topic.

Sincerely yours

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