



December 6, 2021

Mr. David Alderman  
Group Leader, Standards and Conformity Group  
National Institute of Standards and Technology  
100 Bureau Drive  
Gaithersburg, MD 20899

**RE: Comments Responding to National Institute of Standards and Technology (NIST)  
Study on People's Republic of China (PRC) Policies and Influence in the Development  
of International Standards for Emerging Technologies (Federal Register Docket  
Number 211026-0219)**

Dear Mr. Alderman:

The purpose of this letter is to respond to the November 4, 2021 Federal Register Docket 211026-0219, NIST request for public comment regarding the People's Republic of China (PRC) policies and influence in the development of international standards for emerging technologies.

The National Electrical Manufacturers Association (NEMA) represents nearly 325 electrical equipment and medical imaging manufacturers that make safe, reliable, and efficient products and systems. Our combined industries account for 370,000 American jobs in more than 6,100 facilities covering every state. These industries produce \$130 billion in shipments and \$38 billion in exports of electrical equipment and medical imaging technologies per year. NEMA represents 58 product sectors serving seven major U.S. markets: Building Systems, Building Infrastructure, Lighting Systems, Industrial Products & Systems, Utility Products & Systems, Transportation Systems, and Medical Imaging.

**NEMA Responses to the RFI Topics:**

1. The participation of the People's Republic of China in international standards setting organizations over the previous 10 years, including leadership roles in standards drafting technical committees, and the quality or value of that participation

NEMA is actively engaged in international standardization through the International Electrotechnical Commission (IEC) and the International Standards Organization (ISO). NEMA is the Administrator of more than 70 Technical Advisory Groups (TAGs) which serve

as mirror committees to IEC and ISO Technical Committees (TCs) and Subcommittees (SCs). In addition, NEMA Serves as the Secretariat for 6 IEC TCs or SCs. NEMA staff and Members actively participate in international standards meetings and engage with leadership to ensure international consensus.

In the past 10 years, NEMA has experienced an increase in Chinese participation and leadership in the international standards development efforts in which it is involved. It has been noted that Chinese participation is government-sponsored, and many new participants and leaders are government representatives rather than industry representatives.

2. The effect of the standardization strategy of the People's Republic of China, as identified in the "China Standards 2035" plan on international bodies engaged in developing and setting standards for select emerging technologies, such as advanced communication technologies, or cloud computing and cloud services

The China Standards 2035 plan specifies alignment of 85% of its domestic standards with international standards but does not provide sufficient detail regarding its definition of alignment, which could lead to confusion. Additionally, the plan foresees establishment of new standardization research institutes, certification centers and "standards innovation bases." There will also be new prizes and subsidies for standards work given to researchers and companies. These activities could be the beginning of a Chinese effort to bring its own technology to established international standards organizations, and those organizations should expect an increase in the number and frequency of Chinese proposals for new standards in emerging technologies. This is a welcome departure from previous Chinese creation of domestic standards that differed from prevailing international standards as a way to deter foreign products. International standards harmonization is key to a global economy.

3. Recommendations on how the United States can take steps to mitigate the influence of the People's Republic of China and bolster United States public and private sector participation in international standards-setting bodies.

As previously noted, Chinese participation in international standardization is funded and supported by the government, and Chinese participants are government representatives. The U.S. standards development system is and should continue to be a public-private partnership that relies on market-driven, consensus-based, voluntary standards. However, to remain competitive in an international standards development organization where other participants are funded all or in part by their government, the U.S. needs to consider ways to financially support or otherwise incentivize U.S. participation and leadership in international standards. Direct government funding of industry participation in standards should be avoided to also avoid a need for directed votes but could come in the form of

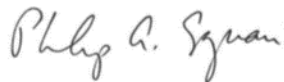
advantageous tax benefits or expansion of public-private partnerships for standards development and engagement. As technology becomes more complex, more specific subject matter experts need to be deployed on standards development in timely manner, cost, and time for participating in the work would put more financial pressure onto U.S. delegates. Tax incentives would greatly alleviate such financial pressure. The Leadership in Global Tech Standards Act of 2021 is a step in the right direction with its provision to provide support for industry participation in international standard organizations, but additional support is needed if we are to remain competitive with Chinese activities.

Additionally, public-private partnerships could be used to fund U.S. participation and leadership in international standardization or investment in U.S. standards for emerging technologies. Developing such U.S. standards could in turn, increase U.S. influence in international standardization and work to counteract the expected increase in Chinese proposals to international standards organizations.

## CONCLUSION

As NIST works through responsive comments in the docket, we would be happy to facilitate a meeting with you to discuss the industry views of Chinese participation and influence in international standardization. Please feel free to contact me ([Philip.Squair@nema.org](mailto:Philip.Squair@nema.org)) to arrange greater engagement with NEMA.

Sincerely

A handwritten signature in cursive script that reads "Philip A. Squair".

Philip A. Squair  
Vice President, Government Relations