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# **China's Comments on PSDO Revision**

**In Re: 6N14032 Request for comments on the draft revision of ISO/IEEE PSDO Agreement**

The National Body of China  
Oct.20, 2009

## **1. Introduction**

This document is prepared by the National Body of China in response to 6N14032 Request for comments on the draft revision of ISO/IEEE PSDO Agreement. The document summarizes China's positions on PSDO and provides some suggestions to its revision.

China National Body is pleased to see in the SC6 Tokyo meeting that ITTF representative Mr. Brannon welcomed SC6 national body to provide comments on the revision of ISO –IEEE PSDO agreement.

China National Body reiterates that cooperation with IEEE is important. The following comments are made with objective to refine and improve PSDO, to make it mature and workable, not to defeat it.

## **2. A Few Guiding Principles**

2.1 While we recognize the value of IEEE partnership, we should ensure that the cooperation agreement does not breach or contradict fundamental ISO/IEC rules and principles.

2.2 PSDO agreement can design innovative cooperation arrangements which are either not prohibited or not in contradiction with existing directives.

2.3 If the PSDO agreement has any clause which contradicts directives, then the clause cannot be regarded as valid unless the directives are revised to avoid contradictions.

2.4 The PSDO agreement should respect the rights of ISO/IEC national bodies to provide comments and revisions during the IS adoption process.

2.5 The PSDO agreement should ensure that IEEE standards being introduced to ISO/IEC should not contradict existing ISO/IEC standards including ongoing projects.

2.6 The PSDO agreement should ensure that the cooperation process is fair, open and with due procedures.

2.7 The PSDO agreement has been subject to several rounds of reviews and evaluations in SC6 and many areas which are vague, inappropriate, or erroneous. ITTF have provided two explanations. These explanations should be rewritten to convert their content into the PSDO agreement.

2.8 The new draft of PSDO agreement should be made available to participating subcommittees to allow review and comments from the people who will be in responsible to develop standards and implementing the agreements.

### 3, Specific Comments and suggestions

The following comments focus on the remaining issues that have not been resolved by the two ITTF explanations letters.

#### 3.1 Problem with the FDIS fast track

SC6 national bodies have voiced concern about the FDIS procedure defined in PSDO for IEEE standards being introduced into ISO/IEC. The current proposal from IEEE is that National bodies can provide comments and revision suggestions during the ballot and those comments and revisions will be taken into account by IEEE revision process. This is still not a satisfactory resolution.

Our objection to the FDIS clause is based on following considerations:

3.1.1 The FDIS only allows national bodies to vote yes or no on IEEE standards and provides no opportunity to make comments or to suggest revisions during the standardization process. This leads to many problems.

3.1.2 Further, the FDIS practically prevents technical discussions. The process gives one month ballot on whether or not take the proposal. Because the time is so short, national bodies would vote without considering the technical issues. Since it only requires a simple majority, the proposal is almost assured of passage. Then the five month ballot starts. During that time, there will be no chance for technical discussions among national bodies. This again almost assures a passage.

3.1.3 The argument behind FDIS is that IEEE is a well recognized SDO and its standard is technically well prepared. We do not deny that. However, we do not believe that national bodies should act like rubber stamps.

3.1.4 The ISO/IEC adoption process can detect and fix problems that IEEE process are not able to do. For example, ISO/IEC experts are national body representatives who in most situations look at the standard from a national policy perspective. A positive vote on the standard would help smooth national adoption later on. They would also review the standards to see if there are contradictions with either existing IS or their national regulations. This is the reason why ISO/IEC standards are adopted worldwide.

3.1.5 If national bodies found contradictions or technical problems but there was no way to fix them, they would be forced to vote negatively. Even though the standard may still pass, its prestige will suffer.

3.1.6 Our suggestion is to remove the FDIS clause and use the normal DIS fast track.

#### 3.2 Simple majority

The PSDO lowered approval criteria to “simple majority”, We believe that such a deviation from directives is unnecessary. We suggest return to the established approval requirement in the directives.

#### 3.3 Copy right and imitation

3.3.1 The word “imitation” should be removed from the PSDO text.

3.3.2 PSDO allows the retention of copyright by IEEE on ISO/IEC adopted IEEE standard needs to be reviewed for two concerns: the contradiction with ISO/IEC Directives and its impact on standards adopted from other SDOs.

#### 3.4 Contradiction

During normal fast track process, identify contradiction is one of the key issue to consider. PSDO should add this element to the standard approval process.

#### 3.5 National Adoptions

The PSDO should be revised to comply with ISO/IEC policies regarding national adoption.

#### 3.6 Adoption with modifications

ITTF explanation says: *“it is requested that IEEE and the secretariat of the ISO committee be informed whenever a standard is adopted nationally with modifications.”*

This issue has general impact and policy conflict. If this is to be an official policy not limited to IEEE cooperation, ISO/IEC directives or some ISO/IEC standards need to be revised.

#### 3.7 Implementation procedures

This agreement does not have implementation procedures without which the agreement is unworkable.

China reserves the right to provide further comment on this subject.