

**ISO/IEC JTC 1
Information Technology**

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UK COMMENTS ON THE DRAFT JTC 1 SUPPLEMENT TO THE ISO/IEC DIRECTIVES

General

1. The UK welcomes the harmonisation of the ISO, IEC and JTC 1 Directives and believes that a consistent set of Directives will facilitate international standardisation with the attendant benefits. Nevertheless, it realises that there may be occasions when the requirements of the bodies differ and, while the UK would prefer to see a single set of Directives in the longer term, it appreciates that there currently need to be supplements for the three bodies containing deviations from the joint Directives. However, it believes that, in the interests of harmonisation, the Supplements should only contain deviations to the joint Directives where these are imperative and that there is significant justification for such deviations.
2. The equivalence of a JTC 1 Sub-Committee and an ISO or IEC Technical Committee needs to be recognised as does the equivalence between a JTC 1 WG and an ISO/IEC SC. The usage of similar terms for organisations at different levels can cause confusion.
3. A considerable amount of the work of JTC 1 is undertaken, not in Sub-Committees but in Working Groups. In some cases, these WGs are (semi-)permanent entities and the SC work is delegated to WGs, especially in the larger SCs. The procedures for WGs are not fully described in the Directives. The UK believes that the Directives must apply equally to WGs as they do to SCs except where the Directives clearly state different procedures for WGs.
- Foreword - specifies that for JTC1 CEO means both CEOs and TMB means both management boards. However, there is clearly to possibility with two entities that they do not agree on some issue so the supplement must be clear on how this is resolved.
- Scope
Since the scope of this supplement is a single Technical Committee a number of the roles defined in clause 1 are outside the scope of the resulting directives. These include:
 - i) the establishment of new Technical Committees as described in item a) of clause 1.1.
 - ii) the establishment and operation of Advisory Groups to the TMBs in clause 1.2.
 - iii) the operation of the JTAB and establishment of new Joint Technical Committees as defined in clause 1.3.Such definitions are not appropriate for inclusion in the JTC 1 directives and therefore should be excluded by the supplement.
- Clause 1.4 - IPR Statements – All information made in relation to these should be made publicly available to standards implementers and the form should be amended to ensure that submitters are aware of this. The information on the patent database should specify the type of licensing agreement
- Clause 1.6.4 Scope Clauses
This seems a place where WGs MUST be ruled by directives or there is no limitation on their scope and no need for them to be limited by SC except as far as the programme of work belongs to SC and should broadly be in SC's scope.
- Clause 1.7.1 the statement "Only one national body per country (either Member Body of ISO or National Committee of IEC) is eligible for membership in JTC 1." is not phrased as a requirement. There should be statement of the form "Only one national

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body per country (either Member Body of ISO or National Committee of IEC) is permitted to be a member of JTC 1."

- Clause 1.7.1 - The statement "In JTC1, there is only one vote per country" is wholly inadequate. This concerns voting process and must be deterministic, i.e. it must cope with multiple votes being submitted from one country. The statement should be more of the form "In JTC1, there is only one vote per country. If there are multiple organisations that could be members of JTC 1 in a country and more than one submits a vote then:
 - If a national body from that country is a member of JTC1 then their vote (or lack of it) is treated as if it is the only vote from that country and any other vote(s) from national bodies in that country are not accepted; or,
 - If none of the national bodies from that country is a member of JTC1 and the votes (including accompanying comments) are identical then the vote is included in the ballot as a single vote; or,
 - If none of the national bodies from that country is a member of JTC1 and the votes (including accompanying comments) are not identical then none of the vote(s) is accepted for inclusion in the ballot."
- Clause 1.11.6.3 - We believe that as currently written, the JTC 1 Directives appear only to apply to SCs. We need to elaborate and make it clear that the policies apply also to WGs, as many of these are now large and active, they need to operate within the Directives as well
- Clause 1.14 Ballot Resolution Meetings – The UK believe that BRMs should exist as a separate specific entity, not just as an example of an Ad Hoc group, applicable to fast-track submissions. We would suggest that the guidance given in Annexe F be extended to all BRMs.
- Clause 2.13 states that the copyright of JTC1 documents (as specified) is owned by both ISO and IEC. Does this mean that where there are two national bodies in a country both are able to publish JTC1 documents irrespective of which is a member of JTC 1?
- Annexe F - The UK, as mentioned in earlier submissions to SWG-D, would like to see a single process, albeit with the accelerated, normal and extended tracks, for the development of all standards in JTC 1.

If the existing processes are retained there is a need for an initial assessment of fast track submissions so that they do not disrupt work going through the "normal" process, and so workload can be managed. A solution is to replace the 30-day review period with an "initiation ballot", which to be feasible should be based on the Explanatory Report rather than an in-depth study of the proposed standard. Each NSB should have the ability to decide whether it accepts the proposal into the fast track process (based on its capability to perform a thorough review of the proposed standard and the impact on the work program of the relevant SC) and whether the proposed standard should be processed in the normal development process.

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