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## China National Body's Comments

### On IEEE Liaison Statements contained in SC6N14234-14237

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This document is China National Body's response to SC6 documents 6N14234, 6N14235, 6N14236 and 6N14237 which called for National Body comments on IEEE draft standards of P802.11v™/D9.0, P802.11U™/D9.0, P802.11p™/D10.0 and P802.11z™/D9.0. After reviewing the documents, China NB has a few comments to make.

1. China NB welcomes this new development. Inviting SC6 national bodies to provide comments on IEEE draft standards in their ballot stage was part of the cooperative agreement between SC6 and IEEE. This process would allow IEEE to know SC6 National Body concerns about IEEE draft standards of 802.11 series and to address them before final approval so that when the standards are submitted to ISO/IEC for adoption they will have smoother passage. We are pleased to see that this procedure is being used for the first time. We believe that it shows IEEE's intention to have a stronger tie between the two organizations. This is encouraging.

2. China National Body is interested in reviewing carefully the technical specifications in the four draft standards and is eager to provide technical comments. However, we found that the time left for National Bodies to review and make comments are too short. For example, Document 6N14234 was circulated on Feb. 25 and the closing date for comments is set on Mar. 5. The time is not sufficient for our technical experts to conduct a through review of the document.

3. Another problem we found is that there is insufficient information for us to conduct a complete review, because:

In 6N14234 about P802.11v™/D10.0, page iii, lines 14-28, there is a paragraph stating:

*"The draft IEEE 802.11v amendment specifies enhancements to the following draft standard and draft amendments, in order to support wireless network management:*

- IEEE 802.11-2007*
- IEEE 802.11k-2008*
- IEEE 802.11r-2008*
- IEEE 802.11y-2008*
- IEEE 802.11w-2009*
- IEEE 802.11n-2009*

- IEEE P802.11p D9.0 (RevCom Nov10 as planned),
- IEEE P802.11z D6.0 (RevCom Jan10 as planned)”

In 6N14236 about P802.11p™/D10.0, page 1, lines 39-40, there is a paragraph stating:

*[This amendment is based on IEEE Std 802.11™-2007, as amended by IEEE Std P802.11k™ 2008, IEEE Std 802.11r™ 2008, IEEE Std P802.11y™, IEEE P802.11w D9.0, IEEE P802.11n D11.0, IEEE P802.11v D7.0, IEEE P802.11p D8.0 and IEEE P802.11z D5.0]*

In 6N14236 about P802.11p™/D10.0, page 1, lines 40-44, there is a paragraph stating:

*“[This amendment is based on IEEE Std 802.11™ -2007 as amended by IEEE Std 802.11k™ -2008, IEEE Std 802.11r™ -2008, IEEE Std 802.11y™ -2008, P802.11w™ -2009, P802.11n™ -2009, and P802.11z™ -D6.0.]”*

In 6N14237, about P802.11z™/D9.0, page 1, lines 40-44, there is a paragraph stating:

*(This amendment is based on IEEE Std 802.11™-2007, as amended by 802.11k™-2008, 802.11r™-2008, 802.11y™- 14 2008, 802.11w™-2009, 802.11n™-2009*

From these quotations, it is clear that these four draft standards are based on several standard developed in IEEE between 2007 and 2009. However, SC6 national bodies have not been consulted on those base standards. Without those base standards, it is very difficult to review and understand the draft amendments.

Therefore, China NB is unable to provide technical evaluations on the four draft standards. Our comments merely concern procedures at this time.

4. Additionally, China National Body wishes to remind IEEE not to be in rush to submit the above mentioned base standards or the four draft standards after they are approved by IEEE to SC6 for adoption due to the fact that there are many unsettled issues regarding the procedures of IEEE-SC6 cooperation. Since China NB’s call for review, clarification and revision of the IEEE-SC6 cooperative agreement in 2006, four years have passed and there are significant differences between IEEE and SC6 regarding the procedures, such as FDIS and PSDO revision. Until these issues are satisfactorily resolved, submission of IEEE standards to SC6 for adoption would only create more confusion and controversy.

5. China National Body would like to reiterate our position of encouraging a stronger cooperation between IEEE and SC6 provided that this cooperation is based on mutual trust, respect, support, and is compliant with the established ISO/IEC principles and rules. We are concerned however we are seeing the trend moving in the other direction.

For example, we are seeing that National Bodies of SC6 are urged to contribute comments to IEEE draft standards and would later probably be requested to cast favorable votes on behalf of their nation on ballot to make them international standards. On the other hands, IEEE has shown intention making its 802.11 standard proprietary by restrictive and irrational copy right policies. In a document recently sent to ISO/IEC, IEEE even claims that an ISO/IEC working document making references to ISO/IEC 8802-11 standards is violating IEEE copy rights. The IEEE correspondence further states that it would not grant derivative standards rights to ISO/IEC projects making references to ISO/IEC 8802-11 standards.

IEEE copy right position regarding 8802-11 is not in harmony with ISO/IEC established policies, nor is it a cooperative attitude. This situation make it difficult for China National Body to provide comments to IEEE draft standards and difficult to make a favorable vote on IEEE standard proposals to ISO/IEC.

6. The situation discussed in section 5 above has a serious impact on not only SC6 projects, but also on potential IEEE submissions and the ISO/IEC operations in general. It affects not only standards activities, but also ISO/IEC rules and principles. We believe that the utmost task now is to clarify IEEE's position on copy right, study its relationship with ISO/IEC established rules and procedures, and clarify the rights and responsibilities of ISO/IEC and its member organizations.

Before these issues are fully resolved, SC6 consideration of new IEEE submissions would be very impractical.

#### Conclusion:

China National Body welcomes the opportunity to make comments on IEEE draft standards. However, due to insufficient information and remaining significant differences on the IEEE-SC6 cooperation procedures, we are unable to either provide comments or to consider new IEEE standard submissions.

China National Body urge IEEE to work more cooperatively with SC6 national bodies to resolve differences as soon as possible.