



**Testimony of Paul Lekas, SVP, Global Public Policy & Government Affairs, Software & Information Industry Association**

**NIST Virtual Listening Session for the  
U.S. Government National Standards Strategy for Critical and Emerging Technology**

**December 19, 2023**

Good afternoon and thank you to NIST for hosting this session. My name is Paul Lekas and I lead global public policy for the Software & Information Industry Association. SIIA is the principal trade association for companies in the business of information. Our members include almost 400 companies reflecting the broad and diverse landscape of digital content providers and users in academic publishing, education technology, and financial information, along with creators of software and platforms used by millions worldwide, and companies specializing in data analytics and information services.

SIIA concurs with NIST's assessment of the benefits of increased U.S. participation and downsides of decreased U.S. participation in standards development activities for CET. Standards provide a rules-based framework to shape economic growth, catalyze innovation, advance consumer growth, and protect democratic values embedded in CET – such as transparency, privacy, safety, a level playing field, and the rule of law. To achieve these goals in an increasingly competitive international technological landscape requires continued commitment from the U.S. private sector and meaningful participation from the U.S. Government. We are pleased that the Government has prioritized leadership in the International Telecommunications Union (ITU) and encourage active participation in other bodies to ensure the United States is well represented in leadership roles.

SIIA's membership includes a mix of large private sector organizations that are directly engaged in international standards efforts and others – small and medium sized enterprises (SMEs) and venture-backed startups – with limited direct involvement. SMEs and startups often lack resources to participate meaningfully in international standards activities. In the CET space, however, SMEs can make valuable contributions to international standards because of their front-line view of cutting-edge CET and experience implementing those solutions in the market. The U.S. Government has an opportunity to bridge the gap between the research community and market stakeholders, focusing on the reality of implementation and more effectively conveying that reality to the industry organizations who will ultimately leverage the standards.

My comments today focus on the first two objectives of the Strategy: Investment and Participation.

### Objective 1: Investment

We commend the Department of Commerce and NIST for taking steps to prioritize international standards through the NSSCET and interagency efforts. We believe continued federal investment in R&D is critical and support, among other things, the formal authorization and funding for the National Artificial Intelligence Research Resource (NAIRR) and fully funding the “science” part of the CHIPS and Science Act.

We also recommend the U.S. Government create targeted grant programs for SMEs and startups to participate in international standards activities. These companies have important perspectives on CET yet often lack the resources needed to participate. Grants to enable travel, registration, and so forth – either directly to companies or to groups representing the interests of companies in a targeted manner – could be a relatively low-cost way to enhance technical contributions to CET standards development.

Technology startups are motivated to support standards development if it serves as a force multiplier when implementing pioneering technologies in the market and drives customer adoption. In general, however, the pace of standards development for CETs often does not keep up with the advancement and usage of those technologies in the commercial space. The U.S. Government could help address this challenge by encouraging the prioritization of standards for fast-moving markets and CET. True cutting-edge technologies that align with core democratic values must maintain or exceed the pace of innovation by competitor nations that may ascribe to different views around transparency, privacy, safety, and so on; accelerating the timeline to standards will drive that momentum forward.

### Objective 2: Participation

Yet in AI and other fields considered “emerging,” standards, while critical, must account for future innovation. Technology will continue to develop and we need to take care not to foreclose innovation that can have enormous societal benefits by giving a leg up to standards that privilege a single approach. Take privacy enhancing technologies, for example. Despite years of R&D and usage, PETs remain a relatively new market category and are being developed and implemented today by both large companies and startups. Work on international standards for PETs is in its infancy.

Resource challenges limit the ability of SMEs and startups to participate in international standards activities. The effect is that standards are developed without input from organizations that may be at the cutting edge of CET research, development, and application. This concern is not limited to the PET space. Standards around digital identity and facial recognition may be evolving without participation from companies that have deep experience in research, development, and application and whose voices would help to improve the quality of international standards that reflect core values.

We fully support efforts by the U.S. Government to increase engagement with the private sector regarding standards development activities for CET. The launching of standards.gov as a



resource for core information has been helpful, especially for smaller organizations. We believe additional efforts could be undertaken to expand engagement in ways that are sensitive to government resources. These efforts may include:

- Creating federal advisory committees focused on standards development in different CET areas to solicit input from private sector entities and share U.S. Government views, especially on national security concerns;
- Convening regular meetings with private sector entities not directly involved in international standards activities;
- Establishing one or more federal grant programs to enable SMEs and startups to participate in international standards activities; and
- Continuing to improve mechanisms to make information publicly available for those unable to participate directly in international standards activities, such as a centralized dashboard to track CET standards activity and regular briefings to private sector companies and trade associations ahead of and following key international standards meetings.

