July 12, 2024

Re: Request for Public Comment on Draft Implementation Roadmap for USG NSSCET

To Whom It May Concern,

The Software and Information Industry Association (SIIA) appreciates the opportunity to provide feedback on the implementation roadmap for the National Standards Strategy for Critical and Emerging Technology (NSSCET) (the "Implementation Roadmap"). We commend NIST for incorporating stakeholder input and developing a comprehensive plan that includes efforts to address both the immediate and long-term actions necessary for sustaining U.S. leadership in standards development for critical and emerging technologies (CETs).

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.

We are pleased that the Implementation Roadmap aligns with the priorities and recommendations raised by SIIA in our initial input submitted in response to the November 2023 Request for Information. We believe the Implementation Roadmap would benefit from further emphasis or details around engagement with SMEs and startups. Providing additional detail around this subset of the private sector will strengthen the overall strategy and ensure more effective stakeholder engagement and outcomes. Below, we outline our support for specific aspects of the roadmap, identify areas of alignment with our initial input, and provide suggestions for further improvement.

Enhancing Private Sector Participation

SIIA strongly supports the roadmap's focus on removing and preventing barriers to private sector participation in standards development. Specifically, we are encouraged by the following actions:

- *Tracking Current USG Programs:* The initiative to track programs that promote, foster, and remove barriers to the U.S. CET stakeholder participation is crucial. We recommend that this tracking include detailed analysis and reporting on the challenges faced by SMEs and startups and where there may be existing gaps, as these entities often lack the resources to engage fully in standards activities.
- *Interagency Coordination Mechanism:* The establishment of an interagency coordination mechanism to track USG implementation of the NSSCET and technical standards engagement is vital. This mechanism should facilitate regular communication between

public and private sectors, ensuring that SMEs and startups have access to the latest information and opportunities for involvement.

- *Supporting Innovation and Strategic Cooperation:* Expanding support for private sector-led efforts that enhance innovation and strategic cooperation, such as standards incubators and accelerators, will nurture innovative standards ideas and provide viable paths through relevant standards development steps.
- *Expanding and Enhancing Support for Private Sector Stakeholders:* We support efforts to expand and enhance support for private sector stakeholders in the development and regular updating of strategic standards roadmaps within and across CET categories. This includes high-urgency, high-impact standardization needs, and supporting events that convene diverse stakeholders to explore opportunities for establishing strategic standards priorities.

We have the following recommendations to strengthen the Implementation Roadmap:

- *Provide further detail on support for SMEs.* As described in our earlier submission, involvement of SMEs in the standards development process is important to promote innovation and competition. While we appreciate the Roadmap's attention to reducing barriers for civil society organizations and academia, we recommend similar attention to tailored engagement strategies to involve SMEs in standardization activities.
- *Provide further detail on mechanisms to advance public-private cooperation.* Public-private partnership or cooperation is essential to ensure U.S. interests are reflected in international standardization activities, especially with regard to the non-commercial interests reflected in Outcome 1.6: "national security, public safety, security, health, and environmental health and resilience." Because the U.S. follows an industry-driven approach to international standards, we recommend further detail on models or frameworks that could support enhanced cooperation, including, as applicable, guidance on how they will be structured, managed, and evaluated.

Improving Communications with Industry

Facilitating streamlined communication between the public and private sectors is a critical component of collaboration with industry roadmap.

- *Improving Communications on Standards Engagement:* Identifying, expanding, and enhancing current channels for communication of USG engagement in standards development activities across CET industry sectors, and developing CET standards committee participation analytics, reports, and metrics, will improve transparency and accountability.
- *Organizing Listening Sessions:* We applaud the plan to organize listening sessions with civil society and underrepresented stakeholder groups. These sessions will provide valuable insights and help ensure that diverse perspectives are included in the standards development process.

- *Federal Advisory Committees:* Utilizing Federal Advisory Committees and other advisory bodies to sustain effective coordination with the private sector is a step in the right direction. These committees should include representatives from SMEs and startups to ensure their voices are heard.

We have the following recommendations to strengthen the Implementation Roadmap:

- *Provide Concrete Information Sharing and Feedback Mechanisms:* We recommend that the Implementation Roadmap include specific guidance on the information sharing mechanisms referenced in Outcome 4 along with channels for stakeholders to provide feedback, in addition to participation in listening sessions and participation in advisory committees.

Increasing R&D for Standards Development

SIIA supports the roadmap's focus on increasing R&D funding to ensure a strong foundation for future standards development. The following actions are particularly noteworthy:

- Identifying Opportunities in Budget Submissions: The roadmap's call for identifying opportunities to increase CET pre-standardization R&D and standards participation activities through annual budget submissions aligns with our recommendation for continued federal investment in initiatives like the National Artificial Intelligence Research Resource (NAIRR) and the CHIPS and Science Act.
- Leveraging Existing Budgetary Resources: We support efforts to leverage existing resources to enhance U.S. participation in international standards development. This approach will help maximize the impact of federal spending and ensure that funds are used efficiently.

Advancing U.S. Representation and Influence in International Standards

We support the roadmap's emphasis on enhancing U.S. representation and influence in international standards governance. Key actions include:

- *Sustaining Agile Participation:* The commitment to sustaining an agile approach to participation in standards development organizations, including formal standards organizations, industry consortia, and open-source software, is commendable. This flexibility will enable the U.S. to remain at the forefront of standards development.
- *International Cooperation Mechanisms:* Establishing mechanisms for enhanced international standards communication and cooperation with like-minded partners and allies will strengthen U.S. leadership in standards governance. Expanding efforts to develop coordination tools for information sharing on standards engagement opportunities will strengthen international collaboration and enhance U.S. leadership in standards development.

- *Revising and Updating the CET List:* Developing a process for revising and updating the evolving CET list every two years will help maintain focus on rapidly advancing and dynamic CET areas. This will align activities with evolving priorities and ensure that the roadmap remains relevant.

Recommendation for Further Implementation Guidance by CET Category

In addition to the above, we recommend that NIST consider developing "NSSCET profiles" for CETs in different categories. The profiles would consider the unique needs, risk profiles, status of standards development work, and other factors for technologies in each category. In our earlier submission, for example, we recommended that NIST consider the unique needs and challenges of specific industries and fast-moving technologies. While the Implementation Roadmap provides an excellent foundation, it does not consider the need for targeted strategies, involvement of different stakeholder groups, and different U.S. governmental interests for different types of CETs. We recommend that NIST pilot this approach by developing an NSSCET profile for the category of privacy enhancing technologies (PETs). If this exercise helps to achieve the objectives of the NSSCET, the project can be expanded to develop NSSCET profiles for other CETs (i.e., those listed in Outcome 1.9).

Conclusion

SIIA remains committed to supporting the NSSCET and collaborating with NIST to advance U.S. leadership in international standards development. We look forward to continued dialogue and partnership to ensure that standards for critical and emerging technologies reflect the interests and expertise of a broad range of stakeholders. Please contact Bethany Abbate (babbate@siia.net) Manager, AI Policy, or Paul Lekas, (plekas@siia.net) SVP, Head of Global Public Policy & Government Affairs.