



Comments by OpenForum Europe on the Proposal for a Common Assessment Method for Standards and Specifications (CAMSS)

September 2008

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OpenForum Europe (OFE) very much welcomes the publication of the Proposal for CAMSS and the opportunity to provide feedback. In 2007 OFE was invited by the EC and the Portugese Presidency to represent the open community in responding to the eGovernment Ministerial declaration. We hope that, like in Lisbon, this joint submission will be given an equal basis to the trade body representing industry and the 'status quo'.

OpenForum Europe acknowledges all the input received from its members and partners in the compilation of this document. However, OpenForum Europe does not seek to represent any specific community nor present its opinions as being unanimously supported by its full membership. References given are fully attributed and every effort made to ensure they have been taken in true context.

Contents

- 1. Introduction**
- 2. Role and Overall Plan**
- 3. Assessment Criteria**
 - Suitability**
 - Potential**
 - Openness**
 - Market Conditions**

Annexe OpenForum Europe



1. Introduction

OFE welcomes the proposal on CAMSS and sees it as a valuable confirmation of many of the objectives as presented in the draft publication of the EIF version 2.0.

OFE is welcoming the draft EIF 2.0 as a very valuable re-affirmation of the original objectives of EIF 1.0. OFE considered EIF 1.0 as fundamentally important regarding the promotion of a pan-European strategy for the delivery of interoperable eGovernment services. EIF 1.0 was a major step, outlining and widely promoting the need for openness and interoperability in public authorities' ICT ecosystems as a basis for innovation and efficient and effective eGovernment services.

For OFE it is encouraging to see that EIF continues along these lines. Openness, open standards and interoperability are crucial both in terms of technical considerations and in terms of the internal market. The integration of complex data and the realisation of cross-border eGovernment applications and services require genuine interoperability. Openness, and open standards in particular, are the major facilitators of interoperability. They are also essential for considering open source offerings and proprietary products on equal footing. In other words: openness guarantees flexibility, choice and fair competition.

OFE is very supportive of the integration of the EIF into a broader strategic and operational framework. The announced further programmes of a European Interoperability Strategy (EIS), European Interoperability Architecture Guidelines (EIAG) and European Interoperability Implementation Services (EIS) have the potential to optimally complement the EIF and provide the necessary tools to promote and foster the development and implementation of PEGS.

OFE entirely supports the descriptions of the relevance of openness for interoperability and PEGS. Openness and open standards are the key facilitators for interoperability and are prerequisites for fair competition, flexibility and choice.

The draft EIF 2.0 reconfirms the characteristics of the EIF 1.0 definition of open standards, yet clearly puts them into the specific EIF context. At the same time it points out that there might sometimes be limitations so that not always the “most open” standards can be selected. The draft EIF 2.0 refers to the “openness continuum”. By this, the draft EIF 2.0 introduces a certain level of pragmatism which might in some cases help to bridge gaps and avoid stand-still.

Together with the practical approach of providing a methodology for the selection of standards and specifications, the draft EIF 2.0 in combination with the CAMSS (Common Assessment Method for Standards and Specifications) initiative addresses this problem and provides a very pragmatic approach and very useful tool well suited to promote the pan-European adoption of the EIF and CAMSS and to foster the development and offering of PEGS.

In general, OFE welcomes this approach. Precaution should, however, be taken to ensure that some key objectives and requirements for PEGS will not be violated, among them full interoperability and preventing vendor lock-in. We have concerns that in determining the openness dimension today that lock-in might be created which will adversely affect capabilities later. It is difficult to identify any situation whereby such potential lock-in could be construed as acceptable or beneficial.

Furthermore, CAMSS is particularly seen by OFE as highly valuable and necessary in supporting the establishment of National Interoperability Frameworks, which OFE see as fundamental in successfully delivering the objectives of the EIF.

Many of the comments being made by OFE in respect of the EIF are equally applicable in terms of CAMSS. They are not repeated verbatim or at length here but we would request they are considered alongside this more limited and focussed submission.

On CAMSS OFE is enthusiastically supportive of the project, its mission and objectives. Nevertheless OFE has criticised some of the detailed questioning supporting the criteria being assessed. At times we found it surprisingly not consistent with the statements in the EIF, and in others not exhaustive or stringent enough to be practical. At this early stage in its development the latter is understandable, and OFE is very willing to provide detailed follow up advice and suggestions, in order to ensure the success of the programme.

2. Role and Overall Plan

Approach Taken

OFE recognises the approach taken to the development of CAMSS, both through the Phase 1 project and report, and by the direct involvement and input from member state representatives. The project report gives confidence on the conclusions reached, and the viability in the approach now being recommended.

A key part of the OFE submission on EIF V2.0 is its ability to be implemented and indeed mandated at member state level. A key conclusion from OFE is in respect of the need to ensure compatibility between NIFs if the objectives of the EIF are to be met. We support the positioning of CAMSS as an essential part of the EIS, sitting alongside EIF and providing the basis for the establishment of NIFs and their interoperability.

CAMSS is recognised as one (but not the only) solution to the perceived gap between strategy and implementation as identified in the EIF. CAMSS focusses on the selection of standards and specifications. Unanswered is the potential impact on the ability to deliver solutions, where the degree of openness, as identified in the EIF, will depend on issues beyond that of individual standards and specifications, and more on how they are implemented within both products and solutions.

We would suggest that more attention is given to how within CAMSS it can benefit the procurement of solutions.

Like EIF we are concerned on how arguments on subsidiarity are being used to avoid the need for mandates for implementation. CAMSS is likely to find itself at the sharp end of such discussions in the future.

EIF V2 reinforces openness and preferred use of open standards and specifications, but recognises short term pragmatism. This is not always evident in CAMSS approach when status quo at times seems to get equal footing. We would suggest that CAMSS must be used to drive the openness continuum, not be an excuse for stagnation. Moreover, where there are no open standards available, OFE recommends that public authorities themselves should trigger the development of an appropriate open standard, stimulating a wide array of stakeholders to join in so that the respective gap can be closed as soon as possible. A potential situation with less open solutions, alluded to in EIF 2.0, should be nothing more than an interim stage of fixing a problem. CAMSS would have the lead role in taking that position.

OFE would furthermore like to stress that competing standards should be avoided. Competing standards are a serious barrier to interoperability, lead to fragmentation and are a distortion of the market. It is unclear both in the EIF document and in this documentation on CAMSS how such an issue will be at best prevented, and at worst managed. The current position on Open Document Exchange formats is but one live example of the competing standards issue.

Public Procurement

OFE agrees with the comments in the EIF that public procurement has a major effect as a driver in technologies; but this is an element not fully explored within CAMSS. In the OFE submission on EIF the extent of our concerns and applicability are explored more fully. But of relevance to this discussion is the OFE support for proposed process of evaluating standards and specifications according to their openness and relevance and, at a second stage, follow the filters as given in Directive 2004/18. However, OFE sees the most critical item regarding the EIF and public procurement is the need to reference specifications from global industry fora and consortia like W3C, IETF or OASIS.

Similarly, the requirement that public authorities need to identify closed systems which pose a barrier to interoperability (p. 41 of the EIF) is very critical. There appears to be a strong case for greater enforcement throughout the Commission and Member States as a prerequisite for the successful development and provision of PEGS. CAMSS has a potentially significant role in the implementation of such solutions. OFE would like to repeat its offer to the Commission to validate Certified Open¹ as a basis for such reviews. Certified Open has been specifically designed to recognise that lock-in is not limited to non-observance of open standards, and may indeed result from one of many causes. The result is the same, For EIF to be effective it is essential that a common understanding of how the wider approach to openness can be realised is promoted.

¹ www.certifiedopen.com

3. Assessment Criteria

The four criteria identified (*suitability, potential, openness, and market conditions*) have been well chosen and have the potential scope to be used in the manner required and be exhaustive enough for tough reasoning and validation.

OFE together with its partners have, through the Certified Open scheme, been trialling processes within which similar tests of openness can be evaluated. We recognise the difficulty of balancing being thorough and exhaustive in their analysis, with comparative straightforward of question and answer. Through the trials it became clear and quite explicit that a straightforward and realistic set of questions was essential to gain buy in, both from the user and supplier of the information.

We would suggest that the four criteria need to consider (within each) the implementation of that standard via product, and encourage a greater level of advice for procurement, ie identifying potential issues for lock in caused by eg proprietary extensions.

OFE would also observe that currently there is insufficient focus on the continuum issue, whereby standards might be superseded or forked. How will the issue of avoiding duplication of standards be tackled?

The following comments are in respect of the questions proposed by criteria.

Suitability

Correctly this is based on the premise that there is a clear understanding of the context and scope of its proposed use, otherwise support of a standard or specification outside the specific context could be abused. There appears therefore to be a need for a specific question to ask/state that exact need?

The avoidance of duplication from directly competing standards needs to be emphasised further.

Potential

We would agree with the criteria used in evaluating this, but would suggest a stronger link to the ability to implement in all business models, and in different products.

The reference to maintenance process is ambiguous when it refers to an 'entity' in charge. There needs to be greater synergy with section on openness, and not treated as discrete discussions.

What is meant by 'compatibility of the standard with other stakeholders'?

There is an opportunity here to investigate future plans for openness of an existing standard/specification.

Openness

Bearing in mind the whole focus on openness within the EIF we perceived this section, whilst long, did not always appear to be in sync with the wording of the draft EIF v2.0, and appeared to have been developed separately?

We would support fully the identification of both the openness of the process and the openness of the deliverables, but this has been wasted by weak explanation of sub categories. Why is there not a direct relationship to the words and definitions used in the EIF? To have two different sets of explanations is confusing and unnecessary.

We would suggest taking the EIF definition as a starting point and then elaborate on each point by a set of questions.

The set of questions seem to over complex the issues in all sub categories.

There seems to be some confusion on the organisation setting the standard and the standard it has set. Surely it should be the latter?

We were surprised not to find any mention of ex ante disclosure?

On openness of process, questions are not stringent enough to identify continuing supplier independence, nor are they enough to define consensus.

Market Conditions

Whilst it is good to recognise maturity of a standard it is difficult to lump mature and immature standards with single questions on market share. There needs to be closer evaluation of potential market share.

In our opinion it is entirely wrong to include questions that suggest it is OK to support a specification if it is proprietary but 'nevertheless many products readily available from a variety of suppliers'. This just protects the status quo. We would suggest the focus should be on IF there is not an equivalent open standard, what plans are there to turn such a proprietary specification into one?

Unclear what is meant by 'is standard partitioned?' For use? By functionality?

Annexe

Openforum Europe

OpenForum Europe (OFE) was originally launched in London in 2002 to encourage and accelerate the use of Open Source Software in business. The mission of OFE has now developed to encourage 'open, competitive choice for the IT user'. In doing so OFE is an active supporter of Open Standards, of wider use of the Open Source /Free Software business model, and the avoidance of lock-in through 'Openness'.

OFE is not-for-profit, limited by guarantee, independent of any organisation, business focussed and non evangelical. OFE operates across Europe both directly and via a network of partners – both national and community based. Based in London, but increasingly important it focusses its European parliamentary and governmental programmes from its Brussels office. OFE draws its membership from both the user and supply (software, hardware, services, integrator and consultancy) communities.

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