OFE

Input to the discussion about improvements of the MSP work and procedures

August 11, 2016
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Brussels, 11th of August, 2016
Introduction

OpenForum Europe (OFE) welcomes the opportunity to provide input to the discussion about possible improvements on the MSP, its areas of work and the procedures.

OFE has been an active contributor to the MSP since its first meeting in spring 2012. OFE has been actively engaged in the discussions about reform of ICT standardisation in Europe, especially regarding better involvement of global ICT standards developing organisations (SDO). These SDOs provide many relevant and innovative global ICT specifications (open standards) for state-of-the-art IT technologies and solutions.

OFE believes that the implementation of the MSP and the reforms laid down in Regulation 1025/2012 have been a breakthrough in the modernisation of the European standardisation system. While these reforms could go further, by giving stronger recognition to the global ICT SDOs, a good and trusted basis has been created for better collaboration and for making global ICT specifications available for use in Europe in order to promote interoperability in the field of ICT. Thus, the basis has been laid for innovative technologies to be introduced beyond the ICT sector. Without the specifications from global SDOs and without their innovation, systems like smart grid, intelligent transport, digital/advanced manufacturing, and eHealth, to name a few, would not be possible at all.

OFE would like to stress that it strongly supports the successful developments in EU ICT standardisation policy since 2012, especially the instruments like the MSP and the EU Rolling Plan on ICT standardisation. The structures and instruments created are unique in the world, and OFE strongly recommends to build on these successes and take them as a solid and trusted basis for further evolving and improving.

We provide the following suggestions for consideration and further discussion.
Continue the highly successful instrument of the MSP

As mentioned above, OFE considers the MSP a huge success story of the Commission. The MSP brings together all relevant stakeholders and the committee has evolved into a platform for open exchange, mutual trust and first-of-class policy advice. It should be continued and strengthened.

The success of the MSP should be reported more widely. Moreover, the MSP should be advertised even more throughout the Commission services as a technical advisory group to consult and collaborate with. Examples show that the involvement of the MSP has helped policy makers obtain first-hand advice, created a community with momentum to support their objectives, and provides a body of experts in standardisation.

At the same time some clarification seems to be appropriate – in particular to Member States – that the MSP is a technical advisory group, not a policy decision making body. There seems to be some confusion that the MSP is parallel to the Committee on Standards (CoS) which it is not. Clarification should help to avoid such misunderstandings and misconceptions.

Build on the good working atmosphere and active participation in the MSP

The MSP has developed a very good and open working atmosphere amongst all its members. This is a very solid and important basis for the successful work which the MSP has delivered since its implementation.

There is high regular attendance to the MSP meetings by all stakeholders and a high level of contribution from all members in the meetings, and in the various task forces and working groups.

All of this has led to a very fruitful exchange and collaboration between all stakeholders – and to a highly increased level of mutual understanding and trust. This includes, in particular, a better understanding between policy makers and all the other stakeholders, and the fast and first-hand advice which the Commission receives from the interaction between all the stakeholders. The “multi-stakeholder” approach, therefore, has really paid off with the MSP.
The Independent Review of the European Standardisation System also positively recognised the MSP, its set-up and the achievements reached.

The Commission should further build on the MSP as a technical advisory group and further pursue it for best-of-class advice across the board of ICT standardization.

**Make the process of identification of ICT specifications more efficient**

The process of identification of ICT specifications according to Regulation 1025/2012, Art. 13, is still too cumbersome and too slow. Moreover, it consumes too much time from MSP members as well as in the meetings. The following aspects may be helpful for discussing possible options to improve the process:

1. **Clarify on the required skills for the assessment:**

   It still seems to create confusion that the assessment is not about technical merits of a specification but about the openness and transparency of the development process it has undergone; the clarity about terms and conditions that govern its availability; the acceptance on the market for procurement or its contribution to interoperability and innovation, respectively; etc. This needs to be clarified and rigorous project management needs to be done in order to keep the discussions within the respective track in order to avoid lengthy discussions and side tracks which are again time consuming.

2. **Professionalise project management:**

   After initial enthusiasm it has become more difficult to find volunteers for leading MSP assessment working groups. Being a chair is time consuming; moreover, it may be hard to justify such efforts if there is no interest of the organisation represented by the respective individuals in the MSP. As a consequence the chairmanship often falls back to the Commission, who also have limited resources and time available.

   Therefore, some improvement might be to subcontract the project management. This could be either external, such as a consultant, or by a group of organisations who are members of the MSP (e.g. ESOs and other SDOs) who could be provided some limited funding/action grant for project management.
3. **Externalise/Optimise the assessment process partially:**

The process of setting up assessment working groups within the MSP is currently very much based on interest while the process as such is to serve public needs. MSP members are certainly committed to support the process and give their advice, however it may be an issue of workload to what extent MSP members can actively engage.

As a remedy, a standing working group or committee could be set up for preparing the assessment based on expert knowledge on processes and on available information. This could be done by sub-contracting either with an external service providers or amongst members of the MSP via action grants. The MSP would then receive a draft report with all required information plus some risk assessment if appropriate and can base its advice on such a draft.

In addition, a standing MSP task force could be formed – like the task force on the Rolling Plan – for supervising the process and all preparatory work that is brought to the MSP.

4. **Create a database with information about SDOs:**

In order to optimise the process a database could be formed containing all basic information of the different global SDOs, especially those that have been identified to date. This database can then be used for retrieving all the generic information about an SDO which is required in the assessment process. An annual verification of the information should be done.

The database can be filled in two ways: (i) As an assessment is done the information about the respective SDO is entered into the database; (ii) All SDOs present in the MSP can pro-actively provide their information.

The above suggestions are only a collection of possible ideas for improving the identification process. They are not dependent on each other so that also only a sub-set of them could be further explored.
Integrate work on the EU Catalogue into the MSP tasks

The MSP with its set up including all relevant stakeholders and its collaborative working methods and style should act as prime technical advisory group on the EU Catalogue. This should include the way the Catalogue is designed as well as the way it is used and populated once it is in place.

The MSP will ensure first hand advice from all affected stakeholders regarding the EU Catalogue: For the Commission and the Member States the Catalogue will be a tool to support public procurement and policy making; for industry the Catalogue will outline the technologies that are eligible for use in the public sector; for standards developing organisations the Catalogue will be a reference point listing standards that are eligible to be referenced in public procurement in Europe.

According to EU law only standards and technical specifications may be listed in the Catalogue which are in the scope of the Procurement Directives or which have been identified according to Regulation 1025/2012, Article 13. For the latter the MSP has a key role to play.

Strengthen the Rolling Plan and its success

The Rolling Plan has reached some level of maturity both regarding (i) the way it is developed, maintained and revised on an annual basis; and (ii) the way it is used by ESOs for applying for, and receiving, action grants, and by both ESOs and SDOs for transposing items into their work programmes.

From an industry perspective the Rolling Plan is of extreme value as it provides a full-fledged overview of EU policy objectives and, as it were, an open call to voluntarily support these objectives with standardisation. Industry makes use of the Rolling Plan for voluntary industry decisions about areas to invest in standardisation as well as setting priorities regarding functionalities.

The MSP Task Force on the Rolling Plan (TFRP) consists of a stable group of highly committed contributors from 10 to 15 MSP members representing the full spectrum of stakeholders including Member States, all ESOs, global SDOs, Annex III organisations, and industry associations. After some heavy workload in
the early years of the Rolling Plan the effort required for fulfilling the tasks of the TFRP have reached some level that seems to be acceptable for task force members with some peaks in September and October. Early and stable planning has helped everyone to accommodate the work and the required meetings.

Looking for improvements has become a permanent work item of the TFRP in order to make the Rolling Plan more readable, increase its usability and the access to it. For 2017 further major improvements have been designed.

The Dashboard accompanying the Rolling Plan also established as an important and helpful tool for progress recording.

Possible further improvements around the Rolling Plan could be:

1. More clarity regarding the proposed actions – The Commission should aim for precise ache as clear actions, following the CARV criteria (Clear, Achievable, Relevant, Voluntary).

2. Closer linkage between the Rolling Plan and the Dashboard – Some closer project management with the Commission services could help to get better feedback on whether the work that is started or that has been identified in response to the actions in the Rolling Plan actually meets the needs of policy makers and which gaps they might still see.

3. Put more focus on the progress section in the Rolling Plan in order to make the progress achieved more transparent.

In general, the Rolling Plan could be advertised and promoted more with all stakeholders and the achievements and progress should be shared more to show the impact that the Rolling Plan makes.

Also, the ESOs and SDOs represented in the MSP should be encouraged to report about their work in respect to the policy priorities. So far presentations from SDOs and other stakeholders have been very generic. It might be an improvement to request some more focussed presentations regarding the policy priorities, the progress and contribution related to the Rolling Plan, etc.
Finally, some clarification is required regarding the differences between the Rolling Plan and the Annual Union Work Programme (AUWP), as there still seems to be some confusion. The Commission web site should make clear that the Rolling Plan is for all non-regulated areas and tasks where the Commission does not see a need to initiate a standardisation request but where voluntary European and global standardisation can support the implementation of policy objectives and can thus be part of the respective implementation strategy.

It is also worth mentioning that the Independent Review of the European Standardisation System also considered the Rolling Plan as a major success including the collaborative approach for developing and reviewing it.

**Further put the Standardisation Priorities into practice**

Clearly the collaborative development of the ICT standardisation priorities, published in Communication COM(2016) 176 in April this year, was a major milestone and success of the MSP. This is again a great basis to build upon for putting the priorities into practice. The MSP should be involved for further advice regarding an implementation plan of the priorities – and, as already announced in the Communication, the Rolling Plan should be one channel for the standards planning for those standardisation actions that do not belong to the scope of Annual Union Work Programme.

One measure could be to have focal sessions on the priorities in the MSP meetings addressing all possible issues in a 360° fashion. This would require some longer term planning and invitation to stakeholders to prepare and actively contribute, as well, for example, holding mini-workshops within an MSP meeting.

Unfortunately the initial characterisation the Communication on ICT Standardisation Priorities as “Priority Plan” has led to some confusion amongst stakeholders with respect to planning tools. While the Communication is clear on that fact that the prioritisation shall be done leveraging the AUWP and the Rolling Plan, some clarification on this might help to avoid ongoing confusion.
**Concluding Remarks**

All in all OFE sees the MSP to be extremely well positioned for fulfilling all the tasks it has per Commission Decision. OFE would encourage the Commission to add respective tasks to the agenda or establish MSP working groups on tasks as required and helpful.

OFE is ready to continue to be an active contributor to the MSP’s success, with a strong commitment and expertise of OFE’s membership and allies. We shall be available for further discussion or clarifications any time.
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