POSITION PAPER

Standards for the Digital Single Market: setting priorities and ensuring delivery

December 2015

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ANEC-ICT-2015-G-136

Executive Summary

ANEC welcomes the European Commission's proposal in its Digital Single Market Strategy adopted on 6 May 2015 "to launch an integrated standardisation plan to identify and define key priorities for standardisation with a focus on the technologies and domains that are deemed to be critical to the Digital Single Market"[1] as we believe that there are important consumers policy and public interest issues which can be effectively tackled with standards, provided the right processes are in place.

Digital technologies have a considerable impact on **consumers' lives**, not only business practices. Standards can help meeting several consumers' needs such as personal data protection and accessibility. ANEC expects that the ICT standardisation Priority Plan focuses on the demand side of the market in order to have the consumers' needs better met. Without confident consumers, the demand of digital products and services of will not be optimised.

Moreover, we think that standards for the Digital Single Market need to involve all interested **European** parties, ie stakeholders from consumers to "conventional" industry adopting ICT solutions, SMEs, research, etc.   All too often ICT standardisation is driven by technology companies in international consortia – these companies are generally based outside Europe, and therefore do not necessarily have European interests at heart.

We have identified the following priorities areas which we believe are critical to help deliver the Digital Single Market objectives for consumers, notably "A Digital Single Market is one in which the free movement of goods, persons, services and capital is ensured and where individuals and businesses can seamlessly access and exercise online activities under conditions of fair competition, and a high level of consumer and personal data protection, irrespective of their nationality or place of residence. Achieving a Digital Single Market will ensure that Europe maintains its position as a world leader in the digital economy, helping European companies to grow globally"[2] :

-Domain 3 **Cybersecurity**: Consumer trust in digital technologies has been seriously eroded in the last years because of the different Internet security-related scandals. We need standards for security and individual privacy.

-Domain 6 **eHealth and aging**: Standards on web accessibility exist, and designing websites accessibly from the outset does not necessarily cost more. However more standards (and legislation) are needed to ensure the accessibility of digital

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[1] http://ec.europa.eu/priorities/digital-single-market/
[2] http://ec.europa.eu/priorities/digital-single-market/

technologies such as apps, for consumers to reap the benefits of the Digital Single Market.

-Domain 8 **Internet of Things**: Internet of Things technologies will have an unprecedented impact on the environment within which they will have to function, most notably on consumers. The standards setting process will need to reflect this and should not be limited to purely technical matters and to economic issues, but will also need to take into account societal and ethical aspects.

-Domain 9 **Smart Cities**: Smart cities are helping to meet global energy targets, to reduce costs of government and social services, to spur job creation and economic growth, to help meet important environmental goals to upgrade and improve the existing infrastructure. In all these challenges, the role of the citizen/consumer is critical. Standards on citizen and consumers requirements are needed as soon as possible.

-Domain 10 **Smart and Efficient Energy Use**: With the transition towards smart energy systems come new opportunities for consumers, but as with any new technology, increasingly sophisticated functionalities can result in unintended consequences. In order to achieve a greater involvement of consumers in their energy usage and management, consumers need to have free and easy access to a usable interface which provides them with understandable and usable information on current and historical consumption. It is therefore important that standards ensure that smart metering systems support the communication of relevant information to the consumer interface, i.e. an in-home display.

However, it is always difficult to select few priorities when so consumers are facing so many challenges and are at risk of detriment. We are alarmed by the lack of reference in the pre-selected priorities to personal data protection/privacy and accessibility as main priorities, although we acknowledge that reference is made to these priorities in some of the sub-domains. We believe that it is useless to set standardisation priorities for the Digital Single Market if consumers, irrespective of age and abilities, are not able to access digital products and services or do not trust them.

Finally, ANEC is concerned that the use of fora and consortia deliverables will preclude the public interest from being reflected in the development of specifications to support broader policy issues. The application of digital technologies needs to reflect consumer concerns (data privacy, data security, accessibility and human health). But it is clear the preference for industry, especially non-European, for lower personal data protection levels, for example. The perceived wish of the European Commission for informal standards developers to take the lead in the setting of these specifications would see a fragmentation of the European standardisation landscape making it even harder for public interest groups to participate and have influence.

Introduction

This position paper expresses ANEC's replies to the European Commission public consultation on Standards in the Digital Single Market: setting priorities and ensuring delivery[3].

As a member of European Commission ICT Multi-stakeholder Platform (MSP), we usually comment, with mixed fortunes, on the Rolling Plan for ICT Standardisation which we see as a complementary to this initiative[4]. We also provided feedback on the draft MSP advice on the Digital Single Market ICR standards priority plan. At the MSP meeting on 26 November 2015 we expressed our disagreement with the suggested priorities as few are of consumers' interest. It is also unclear to us the role of the MSP advice with regards to the public consultation bearing in mind that the pre-identified priorities on which the draft advice is based differ from the pre-identified priorities of the consultation.

For ease of reference, we follow the order of the headings & numbering of the Commission consultation document.

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[3] https://ec.europa.eu/digital-agenda/en/news/public-consultation-priority-ict-standards-plan
[4] ANEC Position Paper on Draft Rolling Plan for ICT Standardisation 2016, August 2015

II.1 Questions on general framework and problem statement

Q1.1 - *Do you share the Commission's analysis in Part 2 of* this document*?*

Partly. The analysis neglects to emphasise the impacts of digital technologies on **consumers' lives**, not only business practices. Standards can help meeting several consumers' needs such as personal data protection and accessibility so we expect more focus on the demand side of the market in order to have the consumers' needs better met. Without confident consumers, the demand ICT products and services of will not be optimised.

Moreover, we think that standards for the Digital Single Market need to involve all interested **European** parties, ie stakeholders from consumers to "conventional" industry adopting ICT solutions, SMEs, research, etc. All too often ICT standardisation is driven by technology companies in international consortia – these companies are generally based outside Europe, and therefore do not necessarily have European interests at heart.

We also miss in the Commission's analysis a reference to the **sharing or collaborative economy**. While we acknowledge the recently launched initiative on Upgrading the Single Market will deal with this issue, we think that beyond the applicable legal framework, the Commission should also consider the effects of the collaborative economy on the relevant standards and how ICT standards can help meet the challenges posed by these new business models.

Q1.2 - *ICT is assuming a greater role in sectors of the economy which were not previously significant users of ICT. How do you see the role of ICT standards for the economy, in particular beyond the ICT sector?*

IMPORTANT

With the widespread use of digital technologies in many consumer products such as household appliances, cars and energy provision systems (eg: smart meters/grids), it might be expected that ICT interoperability issues will happen in other sectors than the tele communications and ICT sectors. The success of digital products and systems is based on a high degree of interoperability.

Consumer needs in ICT standardisation need to be fully taken into account, with standards-setting bodies addressing major concerns such as interoperability, usability, security, data protection and privacy and accessibility. The EU standardisation system uniquely requires the views of all interested parties to be taken into due account and

it should ensure that European standards-setting activities in "conventional" industry take due account of ICT requirements, rather than leaving ICT standardisation as the driver for standards-setting in conventional areas.

Q1.3 - *Do you agree that setting priorities for ICT standards at EU level, accompanied by clear time-tables, could help standard-setting organisations in better organising their work and support the Digital Single Market?*

YES

This would require the European standards bodies to be given a more prominent role, with global consortia – which usually have no real European presence or interest - to be given proper encouragement to collaborate with them over European priorities and issues. This would facilitate also the participation of societal stakeholders such as consumers in the standards processes – at present bodies such as ANEC are unable to participate in the consortia processes, given their global nature, expensive participation fees and lack of appropriate structures. Relevant consumer issues may not therefore be addressed.

Q1.4. - *What other steps should be considered to ensure that any such prioritisation would enjoy broad support of key stakeholders?*

In addition to the specific provisions of the EU standards legislation, and the over-arching role of the Multi-Stakeholder Platform on ICT standardization, an additional arrangement is needed, at the specific project level. This would require a restoration of the role of EU standardisation requests in specific areas within the ICT domain – in recent years these have become less and less important, with more and more emphasis being placed on consortia standards.

These requests would link with "conventional" standards activities, making use of digital technologies, in the ESOs, and would also propose collaboration with relevant consortia. The requests would be issued after consultation of all relevant stakeholders, including consumers.

Q1.5 - *What would be the most effective instrument at EU level to ensure that any such prioritisation is taken up by relevant standard-setting organisations? (please select and rank up to 3 instruments)*

1   Regulation

2   Standardization requests issued to EU standard-setting organisations and
        included in the Annual Union Work Programme for European

standardisation.

Q1.6 - *What would be the impact of a priority ICT standards plan defined at the level of the EU on Europe's effort to pursue leadership in global standard-setting?*

NEUTRAL ("leadership" (ie participation of European interests) is in any case completely related to the specific subjects being considered).

Q1.7 - *What would be the impact of a priority ICT standards plan defined at the level of the EU on the ability of European companies to capture new global market opportunities?*

NEUTRAL. (Same case-by-case aspect.)

Q1.8 - *Besides establishing a priority ICT standards plan, what other measures could the Commission (or other EU institutions) take to ensure that standardisation plays its role in achieving a Digital Single Market?*

Ensure full participation of all relevant societal stakeholder interests, through effective funding and promotion of inclusiveness of the European Standardisation System.

Q1.9 - *How should standard-setting organisations best respond to the increasing speed of technological development and the integration of technologies in business processes across all industrial sectors?*

A - Regarding the *adaptation of existing standards to new developments:*

B - Regarding the *introduction of new standards for new technologies/products*:

A.   The ESOs should be requested to review their existing Technical Bodies programmes, to see what is needed immediately and over the next 5 years to take due account of ICT developments, and to draw up appropriate priorities in consultation with stakeholders.

B.   The ESOs should be encouraged to start new standardisation activities (in collaboration with their global counterparts where appropriate) on a much more pro-active and rapid basis.

Q1.10 - *How do you see the involvement of European ICT Standardization experts in international standardisation organisations (ITU, ISO, IEC) and global standard setting organizations (i.e. IEEE, IETF, OASIS, W3C, ECMA*

international)?

A - The *SCOPE (or LEVEL?) of involvement*:
Is appropriate
<u>Should be increased</u>
Should be decreased
No opinion
B - The *QUALITY of involvement*:
Is appropriate
<u>Should be improved</u>
No opinion

Consumer experts participation in international level is hampered by lack of financing to cover for international trips and possible membership fees. Moreover, ANEC is not as systematically involved in the ISO or IEC processes as it is in the European Standardisation System. ANEC is a Partner Organisation of both CEN and CENELEC and a full member of ETSI, with participation rights (and obligations) at technical and governance levels. In ISO and IEC, ANEC is required to apply for a liaison status to participate in each technical committee of interest as an observer.

Consumer representatives can attend meetings of the technical bodies in ISO & IEC and CEN & CENELEC as members of the national delegations but - as such - have to follow the national positions. Furthermore, there are very few representatives from consumer organisations in national delegations at the international level.

II.2 Questions on priority domains for standardisation in the Digital Single Market

In this section, the Commission invites survey participants to express opinions and ideas on setting priorities for ICT standardisation.

The Commission has identified 10 domains set out below, as well as a set of sub-domains within each domain. Please note that domains and subdomains are interrelated and that overlaps are possible and desirable in particular with respect to synergies between different sectors. Some domains are horizontal and may benefit a large number of sectorial applications; some other domains are more sectorial and were identified as areas where ICT standardisation would bring important benefits.

First check whether the list of domains is complete and relevant. If the list is considered incomplete, please complement it with additional domains that you consider priority.

Q2.1 *Please identify and rank the domains (up to 5) and subsequently subdomains (up to 3 per domain) within each domain that you consider a priority. If specific domains or subdomains are missing please add them. At most 5 answered row(s)*

	1	2	3	4	5
Domain 1: 5G communications	○	○	○	○	○
Domain 2: Cloud computing	○	○	○	○	○
<u>Domain 3: Cybersecurity</u>	◉	○	○	○	○
Domain 4: Data driven services and applications	○	○	○	○	○
Domain 5: Digitisation of European Industry	○	○	○	○	○
<u>Domain 6: eHealth and aging</u>	○	◉	○	○	○
Domain 7: Intelligent Transport Systems (ITS)	○	○	○	○	○

Domain 8: Internet of Things	○	○	◉	○	○
Domain 9: Smart Cities	○	○	○	◉	○
Domain 10: Smart and Efficient Energy Use	○	○	○	◉	○
Others	○	○	○	○	

In general, we are concerned and alarmed by the lack of reference to personal data protection/privacy and accessibility as main priorities, although we acknowledge that reference is made to these priorities in some of the sub-domains. We believe that it is useless to set standardisation priorities for the Digital Single Market if consumers, irrespective of age and abilities, are not able to access digital products and services or do not trust them.

Domain 3: Cybersecurity

at most 3 answered row(s)

	1	2	3
Cyber security design requirements	○	○	◉
Process standard for incident reporting	○	◉	○
Process standard for cyber risk management	○	○	○
Process standard for vulnerability disclosure	○	○	○
Technical standards for encryption	○	○	○
Technical standards for public key infrastructure	○	○	○
Technical standard for security and privacy by design	◉	○	○
Others	○	○	○

*Q2.2 - For the **Domain 3: Cybersecurity** and the subdomains which you*

have selected, please explain briefly how the criteria indicated below apply to them.

- *Link to DSM objectives and other EU policies*
- *Competitiveness of the European industry*
- *Clear and achievable targets*
- *Evidence of market relevance and stakeholders needs*
- *Domains where standard setting has direct benefits for consumers*

Consumer trust in digital technologies has been seriously eroded in the last years because of the different Internet security-related scandals. Personal data protection, security and interoperability are paramount for consumers. However, the predominance of industry in policy and standardisation discussions is a key factor to take into account.

We need standards for security and individual privacy control beyond 'one off' consent for each application of what data may be collected by whom and when (for example real time privacy access control of data collection even when consent has been given initially to data collection). Another key issue is the protection of children when using devices and apps whether designed for them or not. The highest levels of security should be provided by default in order to protect children on-line.

But we need to be mindful that no matter how good standards and best practice are, the problem of enforcement when consumers are victims of on-line fraud remains. Even the most stringent legislation and standards become worthless if they are not applied or enforced.

Q2.3 - *The Priority ICT standards plan should lead to the production of technical specifications, standards or architectures where there is a need/gap, but could also propose any other type of standardisation action such as landscape analysis, gap finding, roadmaps or, ecosystem building that could contribute to ensure that standardisation plays its role in achieving a Digital Single Market. Please explain if a standardisation need/gap exists in the* **Domain 3: Cybersecurity** *and the subdomains which you have selected. Please also indicate within which time-frame such need could be addressed. Please limit to a maximum of five needs/gaps per domain or sub-domain:*

It's not just the responsibility and task of consumers to keep computers, devices and networks safe from malware, ransomware and all kind of Internet scams. There is also a lot that can be done by parties like software and hardware manufacturers, website owners and designers and Internet Service Providers (ISPs). We would like to see policies that would put the responsibility for Internet security not only on the consumers' shoulders. The use of generally recognized

security standards in public procurement of networks could be a way to explore.

We also think that an analysis on whether Internet standards on cyber security in general or on specific sectors/applications (eg: e-banking; Smart Grids/Meters; e-government) is needed at the European level.

Q2.4 - *Among those below, which action could be a priority in the* **Domain 3: Cybersecurity** *and the subdomains which you have selected? Please rank the list below and explain your choice.*

	1	2	3	4	5	6	7	8	9
• Mandating European Standardisation Organisations (ESOs) for fast delivery of standards/technical specifications.	⦿	○	○	○	○	○	○	○	○
• Foster cooperation among standards development organisations for ICT priorities	○	○	○	○	○	○	○	○	○
• Support Research & Innovation projects to contribute to standardisation	○	⦿	○	○	○	○	○	○	○
• Community Building	○	○	○	○	○	○	○	○	○
• Support creation of public-private partnerships - PPP	○	○	○	○	○	○	○	○	○
• Increase strategic coordination of ICT standardisation at EU level.	○	○	○	○	○	○	○	○	○
• Ensure consistent application of existing standards	○	○	⦿	○	○	○	○	○	○
• Accelerate the identification of ICT technical specifications most commonly used for their reference in public procurement	○	○	○	○	○	○	○	○	○
• Other	○	○	○	○	○	○	○	○	○
• No opinion	○	○	○	○	○	○	○	○	○

Q2.5 - *Please indicate any other standardisation initiatives which would help achieving the Digital Single Market in the* **Domain 3: Cybersecurity** *and the subdomains which you have selected, and who in the standardisation landscape*

would be best placed to lead on these initiatives:

There is currently no well recognised and trustworthy and transparent international Cyber Security capability. ESOs standardisation work on electronic signatures and digital certificates is undergoing, linked to recently approved legislation[5]. We hope this work will be finalised soon as dependency on a few technology manufacturers could (continue to) cause confidence issues amongst consumers. And international coordination is essential to avoid duplication of efforts, lack of interoperability and gaps.

Q2.6 - Would your organisation be prepared to invest resources in standard-setting to achieve the priority standards within the proposed time-frames?

○ YES

◉ YES, provided some conditions are met

○ NO

○ No opinion

Domain 6: eHealth and aging

at most 3 answered row(s)

	1	2	3
Drug identifiers for medical prescriptions	○	○	○
<u>ICT infrastructure for the implementation and delivery of services for independent living in age-friendly buildings</u>	○	○	○
Interoperability profiles for independent living (Interoperability profiles describe specific solutions to interoperability in a specific use case scenario. A profile documents how standards will be used in order to achieve interoperability. Profiles ensure implementers and users that they are talking about the same solution without having to restate all the technical details that establish actual interoperability.)	○	○	○

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[5] eIDAS Regulation ([REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on electronic identification and trust services for electronic transactions in the internal market and repealing Directive 1999/93/EC](#)), CEN TC 224 elaborating standards on electronic signatures.

Interoperability profiles for mHealth apps   ○ ○ ○

Quality criteria for health and wellness apps   ○ ○ ○

<u>Security and Safety of mHealth apps</u>   ○ ○ ○

Semantic interoperability of Electronic Health Records   ○ ○ ○

Telemedicine   ○ ○ ○

Others: end-user security and data protection

> *Q2.2 - For the **Domain 6: eHealth and aging** and the subdomains which you have selected, please explain briefly how the criteria indicated in Box I apply to them.*
>
> - *Link to DSM objectives and other EU policies*
> - *Competitiveness of the European industry*
> - *Clear and achievable targets*
> - *Evidence of market relevance and stakeholders needs*
> - *Domains where standard setting has direct benefits for consumers*

The EU population is ageing, and the likelihood of experiencing a disability increases with age. This means that the number of people living with a disability will increase. According to the European Commission, 25 % of the EU population will be over the age of 60 by 2020 and currently 21% of persons over 50 experience severe vision, hearing or dexterity impairments. This percentage increases with age, therefore more and more people will need accessible digital technologies.

Standards on web accessibility exist, and designing websites accessibly from the outset does not necessarily cost more. However more standards (and legislation) are needed to ensure the accessibility of digital technologies such as apps, for consumers to reap the benefits of the Digital Single Market.

> *Q2.3 - The Priority ICT standards plan should lead to the production of technical specifications, standards or architectures where there is a need/gap, but could also propose any other type of standardisation action such as landscape analysis, gap finding, roadmaps or, ecosystem building that could contribute to ensure that standardisation plays its role in achieving a Digital Single Market. Please explain if a standardisation need/gap exists in the **Domain 6: eHealth and aging** and the subdomains which you have selected. Please also indicate within which time-frame*

such need could be addressed. Please limit to a maximum of five needs/gaps per domain or sub-domain:

We live in an increasingly digitalised world, where access to the Internet is a factor of independence and inclusion. Essential information is sometimes only accessible on the Internet. While digital technologies offer unprecedented opportunities to widen access to the information society, inaccessible applications mean that access to information remains a major challenge for many disabled and older people.

In 2014, ANEC welcomed the adoption of EN 301 549 "Accessibility requirements suitable for public procurement of ICT products and services in the Europe" and a series of supporting Technical Reports. However more standards are urgently needed to ensure full accessibility of digital products and services.

Q2.4 - *Among those below, which action could be a priority in the* **Domain 6: eHealth and aging** *and the subdomains which you have selected? Please rank the list below and explain your choice.*

	1	2	3	4	5	6	7	8	9
• Mandating European Standardisation Organisations (ESOs) for fast delivery of standards/technical specifications.	◉	○	○	○	○	○	○	○	○
• Foster cooperation among standards development organisations for ICT priorities	○	○	○	○	○	○	○	○	○
• Support Research & Innovation projects to contribute to standardisation	○	◉	○	○	○	○	○	○	○
• Community Building	○	○	○	○	○	○	○	○	○
• Support creation of public-private partnerships - PPP	○	○	○	○	○	○	○	○	○
• Increase strategic coordination of ICT standardisation at EU level.	○	○	○	○	○	○	○	○	○
• Ensure consistent application of existing standards	○	○	◉	○	○	○	○	○	○
• Accelerate the identification of ICT technical specifications most commonly used for their reference in public procurement	○	○	○	○	○	○	○	○	○

• Other ○ ○ ○ ○ ○ ○ ○ ○ ○

• No opinion ○ ○ ○ ○ ○ ○ ○ ○ ○

Q2.5 - *Please indicate any other standardisation initiatives which would help achieving the Digital Single Market in the* **Domain 6: eHealth and aging** *and the subdomains which you have selected, and who in the standardisation landscape would be best placed to lead on these initiatives:*

The ESOs should be requested to develop standards for accessibility of all the priority domains of the Digital Single Market.

Q2.6 - *Would your organisation be prepared to invest resources in standard-setting to achieve the priority standards within the proposed time-frames?*

○ YES

⦿ YES, provided some conditions are met

○ NO

○ No opinion

Domain 8: Internet of Things

at most 3 answered row(s)

	1	2	3
Advanced Manufacturing / M2M	○	○	○
<u>Building and Home automation</u>	⦿	○	○
Energy / Environment monitoring	○	○	○
Medical and health care systems	○	○	○

Reference architectures and related standardised
interfaces

Smart cities and communities

Smart living environment for ageing well

Smart farming and food security

Transportation (including ITS, C2C, C2I, automated
driving)

Wearables

Others

Q2.2 - *For the* **Domain 8: Internet of Things** *and the subdomains which you
have selected, please explain briefly how the criteria indicated in below apply to
them.*

- *Link to DSM objectives and other EU policies*
- *Competitiveness of the European industry*
- *Clear and achievable targets*
- *Evidence of market relevance and stakeholders needs*
- *Domains where standard setting has direct benefits for consumers*

Internet of Things technologies will have an unprecedented impact on the
environment within which they will have to function, most notably on consumers.
The standards setting process will need to reflect this and should not be limited to
purely technical matters and to economic issues, but will also need to take into
account societal and ethical aspects.

Q2.3 - *The Priority ICT standards plan should lead to the production of technical
specifications, standards or architectures where there is a need/gap, but could
also propose any other type of standardisation action such as landscape analysis,*

gap finding, roadmaps or, ecosystem building that could contribute to ensure that standardisation plays its role in achieving a Digital Single Market. Please explain if a standardisation need/gap exists in the **Domain 8: Internet of Things** and the subdomains which you have selected. Please also indicate within which time-frame such need could be addressed. Please limit to a maximum of five needs/gaps per domain or sub-domain:

Digitally connected devices process or collect a vast range of data from consumers that can then be used for personal processing or collected by others for other purposes.   In this fast-changing environment, individuals must retain effective control over their personal data. This is a fundamental right for everyone in the EU and must be safeguarded. Standards should be developed to allow the implementation of the principles of privacy by design and by default which can ensure a high level of consumer protection.

Q2.4 - *Among those below, which action could be a priority in the **Domain 8: Internet of Things** and the subdomains which you have selected? Please rank the list below and explain your choice.*

	1	2	3	4	5	6	7	8	9
• <u>Mandating European Standardisation Organisations (ESOs) for fast delivery of standards/technical specifications.</u>	⊙	○	○	○	○	○	○	○	○
• Foster cooperation among standards development organisations for ICT priorities	○	○	○	○	○	○	○	○	○
• <u>Support Research & Innovation projects to contribute to standardisation</u>	○	⊙	○	○	○	○	○	○	○
• Community Building	○	○	○	○	○	○	○	○	○
• Support creation of public-private partnerships - PPP	○	○	○	○	○	○	○	○	○
• Increase strategic coordination of ICT standardisation at EU level.	○	○	○	○	○	○	○	○	○
• <u>Ensure consistent application of existing standards</u>	○	○	⊙	○	○	○	○	○	○

• Accelerate the identification of ICT technical
specifigcations most commonly used for their
reference in public procurement

○ ○ ○ ○ ○ ○ ○ ○ ○

• Other

○ ○ ○ ○ ○ ○ ○ ○ ○

• No opinion

○ ○ ○ ○ ○ ○ ○ ○ ○

Q2.5 - *Please indicate any other standardisation initiatives which would help
achieving the Digital Single Market in the* **Domain 8: Internet of Things** *and the
subdomains which you have selected, and who in the standardisation landscape
would be best placed to lead on these initiatives:*

The success of Internet of Things deployment very much depends on the challenge
of ensuring adequate protection and security of personal data. The ESOs should be
requested to develop standards on privacy by design and by default for IoT
applications.

Q2.6 - Would your organisation be prepared to invest resources in standard-
setting to achieve the priority standards within the proposed time-frames?

○ YES

◉ YES, provided some conditions are met

○ NO

○ No opinion

Domain 9: Smart Cities

at most 3 answered row(s)

	1	2	3
Application Programming Interfaces for urban platforms	○	○	○

Urban Indicators   ○ ○ ○

<u>Urban Management System (city planning)</u>   ◉ ○ ○

Urban Ontologies (for specific domains (including city objects,   ○ ○ ○
geometric elements and themes) or cross-domain)

Urban Platforms   ○ ○ ○

<u>Urban transactions (payments, identification, etc.)</u>   ◉ ○ ○

Others:

<u>Citizen requirements, plus overall security and data protection</u>

*Q2.2 - For the **Domain 9: Smart Cities** and the subdomains which you have selected, please explain briefly how the criteria indicated below apply to them.*

- *Link to DSM objectives and other EU policies*
- *Competitiveness of the European industry*
- *Clear and achievable targets*
- *Evidence of market relevance and stakeholders needs*
- *Domains where standard setting has direct benefits for consumers*

Smart cities are helping to meet global energy targets, to reduce costs of government and social services, to spur job creation and economic growth, to help meet important environmental goals to upgrade and improve the existing infrastructure. In all these challenges, the role of the citizen/consumer is critical.

*Q2.3 - The Priority ICT standards plan should lead to the production of technical specifications, standards or architectures where there is a need/gap, but could also propose any other type of standardisation action such as landscape analysis, gap finding, roadmaps or, ecosystem building that could contribute to ensure that standardisation plays its role in achieving a Digital Single Market. Please explain if a standardisation need/gap exists in the **Domain 9: Smart Cities** and the subdomains which you have selected. Please also indicate within which time-frame such need could be addressed. Please limit to a maximum of five needs/gaps per domain or sub-domain:*

Citizen requirements, plus overall security and data protection, as soon as possible.

*Q2.4 - Among those below, which action could be a priority in the **Domain 9: Smart Cities** and the subdomains which you have selected? Please rank the list below and explain your choice.*

	1	2	3	4	5	6	7	8	9
• <u>Mandating European Standardisation Organisations (ESOs) for fast delivery of standards/technical specifications.</u>	⦿	○	○	○	○	○	○	○	○
• Foster cooperation among standards development organisations for ICT priorities	○	○	○	○	○	○	○	○	○
• <u>Support Research & Innovation projects to contribute to standardisation</u>	○	⦿	○	○	○	○	○	○	○
• Community Building	○	○	○	○	○	○	○	○	○
• Support creation of public-private partnerships - PPP	○	○	○	○	○	○	○	○	○
• Increase strategic coordination of ICT standardisation at EU level.	○	○	○	○	○	○	○	○	○
• <u>Ensure consistent application of existing standards</u>	○	○	⦿	○	○	○	○	○	○
• Accelerate the identification of ICT technical specifications most commonly used for their reference in public procurement	○	○	○	○	○	○	○	○	○
• Other	○	○	○	○	○	○	○	○	○
• No opinion	○	○	○	○	○	○	○	○	○

Q2.5 - *Please indicate any other standardisation initiatives which would help achieving the Digital Single Market in the* **Domain 9: Smart Cities** *and the subdomains which you have selected, and who in the standardisation landscape would be best placed to lead on these initiatives:*

Smart cities should have citizen welfare at their core. The needs of the citizens should therefore be considered in every standardization activity relevant to smart cities.

Q2.6 - Would your organisation be prepared to invest resources in standard-setting to achieve the priority standards within the proposed time-frames?

○ YES

◉ YES, provided some conditions are met

○ NO

○ No opinion

Domain 10: Smart and Efficient Energy Use

at most 3 answered row(s)

	1	2	3
BIM – Building Information Modelling	○	○	○
<u>Building automation and smart appliances</u>	◉	○	○
<u>Electrical vehicles integration with smart grid and home management systems</u>	○	◉	○
Energy efficiency indicators	○	○	○
Heating/Cooling networks including heat supply from waste	○	○	○
Interconnection of electricity, gas and heating networks	○	○	○
Interfaces to Storage systems	○	○	○
Lighting	○	○	○
Power electronics	○	○	○
<u>Smart grids, smart metering</u>	○	◉	○

Others

Q2.2 - *For the **Domain 10: Smart and Efficient Energy Use** and the*

subdomains which you have selected, please explain briefly how the criteria indicated below apply to them.

- *Link to DSM objectives and other EU policies*
- *Competitiveness of the European industry*
- *Clear and achievable targets*
- *Evidence of market relevance and stakeholders needs*
- *Domains where standard setting has direct benefits for consumers*

With the transition towards smart energy systems come new opportunities for consumers, but as with any new technology, increasingly sophisticated functionalities can result in unintended consequences. ANEC believes that consumers should be protected against the risks associated with the new technologies and from control of data. Above all, consumers should be able to realise the benefits arising from smart energy systems.

Q2.3 - *The Priority ICT standards plan should lead to the production of technical specifications, standards or architectures where there is a need/gap, but could also propose any other type of standardisation action such as landscape analysis, gap finding, roadmaps or, ecosystem building that could contribute to ensure that standardisation plays its role in achieving a Digital Single Market. Please explain if a standardisation need/gap exists in the* **Domain 10: Smart and Efficient Energy Use** *and the subdomains which you have selected. Please also indicate within which time-frame such need could be addressed. Please limit to a maximum of five needs/gaps per domain or sub-domain:*

In order to achieve a greater involvement of consumers in their energy usage and management, consumers need to have free and easy access to a usable interface which provides them with understandable and usable information on current and historical consumption. It is therefore important that standards ensure that smart metering systems support the communication of relevant information to the consumer interface, i.e. an in-home display. ANEC calls for an accessible and ergonomic design of in-home displays and smart meters. Studies have suggested that many displays may be difficult to use for some consumers. Unfortunately, this issue was outside the scope of the standards work in response to mandate M/441 on smart meters.

Q2.4 - *Among those below, which action could be a priority in the* **Domain 10: Smart and Efficient Energy Use** *and the subdomains which you have selected? Please rank the list below and explain your choice.*

	1	2	3	4	5	6	7	8	9
• Mandating European Standardisation Organisations (ESOs) for fast delivery of	◉	○	○	○	○	○	○	○	○

standards/technical specifications.

• Foster cooperation among standards
development organisations for ICT priorities

  ○ ○ ○ ○ ○ ○ ○ ○ ○

• <u>Support Research & Innovation projects to
contribute to standardisation</u>

  ○ ◉ ○ ○ ○ ○ ○ ○ ○

• Community Building

  ○ ○ ○ ○ ○ ○ ○ ○ ○

• Support creation of public-private
partnerships - PPP

  ○ ○ ○ ○ ○ ○ ○ ○ ○

• Increase strategic coordination of ICT
standardisation at EU level.

  ○ ○ ○ ○ ○ ○ ○ ○ ○

• <u>Ensure consistent application of existing
standards</u>

  ○ ○ ◉ ○ ○ ○ ○ ○ ○

• Accelerate the identification of ICT technical
specifications most commonly used for their
reference in public procurement

  ○ ○ ○ ○ ○ ○ ○ ○ ○

• Other

  ○ ○ ○ ○ ○ ○ ○ ○ ○

• No opinion

  ○ ○ ○ ○ ○ ○ ○ ○ ○

Q2.5 - *Please indicate any other standardisation initiatives which would help
achieving the Digital Single Market in the* **Domain 10: Smart and Efficient
Energy Use** *and the subdomains which you have selected, and who in the
standardisation landscape would be best placed to lead on these initiatives:*

A lack of interoperability within the smart grid system inhibits competition and
reduces consumer benefits. Our concern on interoperability is the risk of loss of
functionality for consumers from end devices when they change supplier, when the
meter is changed or when the system is upgraded. Consumer concerns around
privacy and data security are likely to create problems for consumer acceptance and
engagement. ANEC therefore calls for the consumer requirements on data privacy
and international best practices to be fully reflected in the development of use cases
and standards for smart metering and smart grids.

Potential concerns around the safety of devices and components should be
addressed, including risks from increased exposure to radio frequency emissions
which could have detrimental health impacts especially for the elderly, children and
people with electromagnetic hyper sensitivity.

The ESOs should be requested to address the above issues in their standardisation work.

 Q2.6 - Would your organisation be prepared to invest resources in standard-setting to achieve the priority standards within the proposed time-frames?

⊙ YES

◉ YES, provided some conditions are met

⊙ NO

⊙ No opinion

OTHER COMMENTS:

ANEC is concerned that the use of fora and consortia deliverables will preclude the public interest from being reflected in the development of specifications to support broader policy issues. The application of digital technologies needs to reflect consumer concerns (data privacy, data security, accessibility and human health). But it is clear the preference for industry, especially non-European, for lower personal data protection levels, for example. The perceived wish of the European Commission for informal standards developers to take the lead in the setting of these specifications would see a fragmentation of the European standardisation landscape making it even harder for public interest groups to participate and have influence.

European ICT research projects, many of which are seeking to build consensus amongst groups of companies or other entities on issues highly relevant to standards-making, need to be involved closely in these processes to ensure their outputs are put into the standards arena. The European standards bodies should also be encouraged to collaborate more closely with informal industry standards-setting consortia, and these consortia should be encouraged to view the European standards bodies as the means for their standards to receive a 'formal European endorsement'. These approaches should be promoted and perceived as 'win-win' situations.

But a pre-requisite is that such 'formal European endorsement' must be both genuine and testing. The 'fast-track' procedures of ISO/IEC – which amount to little more than rubber stamping of proprietary specifications – must not be repeated at

European level. The proposed adoption some years ago of a private standard through fast-track as ISO/IEC 29500 '*Information technology – Office Open XML file formats*' questioned the credibility of the formal standards system.

ENDS.

About ANEC

ANEC is the European consumer voice in standardisation, defending consumer interests in the processes of technical standardisation and conformity assessment, as well as related legislation and public policies.

ANEC was established in 1995 as an international non-profit association under Belgian law and is open to the representation of national consumer organisations in 33 countries.

ANEC is funded by the European Union and EFTA, with national consumer organisations contributing in kind. Its Secretariat is based in Brussels.

Raising standards for consumers

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ANEC is supported financially by the European Union & EFTA