

## **European Interoperability Framework: ECIS Observations on the Gartner Report**

ECIS welcomes this opportunity to comment on the report produced by Gartner Group as part of the European Commission's review of the European Interoperability Framework ("EIF") v1.0.

ECIS is an international not-for-profit association founded in 1989 that strives to promote market conditions in the ICT sector allowing vigorous competition on the merits and a diversity of consumer choice. ECIS' members include large and smaller information and communications technology hardware and software providers Adobe, Corel, IBM, Linspire, Nokia, Opera, Oracle, RealNetworks, Red Hat and Sun Microsystems, whom ECIS actively represents on many issues related to interoperability and competition before European, national and international bodies, including the EU institutions. As such, ECIS takes an active interest in the European Commission's review of EIF v1.0: ECIS considers that the EIF has played an important role in promoting the concept of interoperable systems among the Member States' public administrations, and hopes the revised version of the EIF will continue to further this objective.

ECIS fully endorses the comments already submitted to the Commission by Sun, IBM and OpenForum Europe. However, ECIS will not repeat those submissions here, but rather will limit its comments to key observations it considers to be of particular importance in the context of the EIF review.

*First*, ECIS supports the definition of "open standards" as set out in EIF v1.0. ECIS would strongly encourage any amendment to this definition to retain the concept of open standards set out in the current version, as a clear definition is essential to understanding and applying the remainder of the document. It is ECIS' sincere hope that any amendment to this aspect of EIF v1.0 will be undertaken with regard to the importance of open standards in fostering innovation and competition among industry players.

*Second*, ECIS strongly refutes the conclusions drawn by Gartner that multiple competing standards are to be welcomed in this sphere. ECIS considers that the use of multiple competing standards - and in particular standards that are proprietary or that can only be correctly implemented by a single vendor - will negate one of the key aims of the EIF, namely to promote interoperability among public administrations' services. Certain standards in the ICT area are today linked to the products of a single dominant supplier and alternative standards cannot effectively compete as the Gartner study would suggest.

Essentially, multiple standards mean that a public administration using a product that implements one of the standards cannot necessarily interoperate with a public administration using a different product that implements a different standard. Moreover, if a public administration is essentially "locked-in" to a single standard, this can also increase costs (for the administrations, and therefore the taxpayer) - for example, in finding a solution to enable

interoperability with other standards used by other public administrations, or in moving away from the proprietary standard adopted. For these reasons, ECIS instead advocates agreement between the Member States' services on common, open standards, with competition and innovation then taking place in relation to *implementation*. Further, while ECIS as an industry association did not participate in the workshops held by Gartner to discuss the EIF, a number of ECIS' member companies did attend, and ECIS understands from those members that the need to agree on common standards was in fact the prevalent view among the workshop participants.

*Third*, and as a more general point, ECIS considers that public administrations should require open standards compliance in their calls for tender (insofar as satisfactory open standards exist). Such a requirement would encourage the use of open standards across the Member States and as a result may hasten a move towards interoperability among the Member States' public administrations, furthering one of the key aims of the EIF.

*Fourth*, ECIS would also like to see EIF v2.0 encouraging public administrations to participate in the standards development process, to ensure their requirements are fully understood by industry players. By encouraging the public administrations to increase their participation in this area ECIS believes open standards may be promoted at the expense of multiple competing standards, and the open standards that *do* develop will be better suited to the public administrations' demands and needs. ECIS will expand on these last two points in response to the Commission's consultation on the draft EIF v2.0 document.

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ECIS looks forward to the Commission's publication of the draft EIF v2.0, and to commenting on that document in due course.