



To: Jean-François AGUINAGA, Head of Unit DG GROW  
B3 Standards for Growth, European Commission

Cc: Peter Statev, ETSI Vice Chairman, ICT Cluster  
Chairman  
Fabio Massimo, CEN PC 428 Chairman, President of CNA  
ICT

Brussels, 17 July 2015

**Ref: SMEs in ICT Standardisation**

Dear Mr Aguinaga,

First of I would like to congratulate your recent appointment as Head of Unit for Standards and Growth at the European Commission. Your new role is of high strategic relevance to enhance the competitiveness of European small and medium sized enterprises (SMEs) through their active involvement in the development of standards for the ICT sector. So, I would like to take this opportunity to present you some of the issues that are important for us and possibly put the grounds for a fruitful collaboration in future.

I am writing to you on behalf of PIN-SME, the European association of Small and Medium sized Enterprises (SMEs) in the ICT sector. PIN-SME is a founding member of Small Business Standards (SBS) and standardisation is among our priorities. We are committed to raise awareness among SMEs about the importance of ICT standards and to represent the interests of the SME community in standardisation at the best of our possibilities.

Besides having contributed to the foundation of SBS and having appointed several experts in standards technical committees that are fundamental for our sector, I would like to mention some of our main achievements so far:

- Creation of a new standards committee, the CEN/PC428 on competences for the ICT profession, in charge of delivering the European standard on e-skills, the e-Competence Framework. Such standard is key to establish a common language for digital skills in Europe and is recognised as a key policy initiative of the EC in order to foster the Digital Single Market. Mr Fabio Massimo, Vice President of PIN-SME, chairs CEN/PC428.
- Contribution to the SME response to the EC consultation on Patents and Standards. Our response, delivered both by PIN-SME and by SBS, was taken into account by the EC and led to the decisions by ETSI to initiate concrete actions: a) to improve transparency of its IPR database, and b) to raise SME awareness about its IPR policy. Our Secretary General, Mr Sebastiano Toffaletti participates in the ETSI committee on IPR.
- The election of SME representatives as ETSI Board member and as ETSI Vice Chairman of the General Assembly (respectively Mr Sebastiano Toffaletti and Mr Peter Statev).

You can read more about our work in ICT standardisation at our dedicated webpage **ICT standards for SMEs** at [www.it-sme.eu/category/ictstandards4smes](http://www.it-sme.eu/category/ictstandards4smes).

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UNION EUROPEENNE DE L'ARTISANAT ET DES PETITES ET MOYENNES ENTREPRISES  
EUROPÄISCHE UNION DES HANDWERKS UND DER KLEIN- UND MITTELBETRIEBE  
EUROPEAN ASSOCIATION OF CRAFT, SMALL AND MEDIUM-SIZED ENTERPRISES  
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Despite some successes and some support from SBS, the challenges of ICT SMEs in standardisation remain very high. Only in ETSI there are 10 technology clusters covering important areas such as Networks, Wireless Systems and Security among others; for each of these clusters, several technical bodies are developing standards covering the different areas. Despite SMEs being almost 99% of companies in Europe, only a tiny percentage of ETSI members is made by SMEs (ie 25% according to the ETSI official statistics, but according to our estimations the real representation in technical committees is less than 10%). Currently SBS supports three SME experts in ETSI. This is clearly not sufficient to cope with the huge amount of on-going standardisation work and the fast pace of standards development in the ICT sector.

The situation is not better at CEN and CENELEC, which both have technical committees in ICT. The existence of national delegations is not a guarantee of SME participation per se. First of all, national delegations do not always exist in all countries and, secondly, in our experience there is little evidence of SME participation.

In our view, the representation of SMEs' interests in ICT standardisation needs to be improved. Perhaps differently from other sectors, ICT needs standards to ensure interoperability and technological convergence for products and services to actually be able to work. This is even more important for SMEs that live in complex technological ecosystems and, different from multinational corporations, cannot afford to build vertically integrated technologies and impose them as global de facto standards.

In order to achieve better representation of SMEs in ICT standardisation, we believe that it is necessary to not only provide more support for experts, but also to ensure coordination among experts and involvement of the SME community at large. Without these elements, we fear that any initiative will be unable to produce visible results.

With a view of understanding your priorities and ideas for SMEs in ICT standardisation, as well as better presenting our vision, I would like to request a meeting after with you and your team. I would also be pleased to involve in such meeting our representatives in different areas, namely Mr Fabio Massimo (SBS Board member and Chairman of CEN/PC428), Mr Peter Statev (ETSI Vice Chair) and Mr Sebastiano Toffaletti (ETSI Board member). Considering our availability for travelling to Brussels, I would like to propose the following day: 9 September 2015. Should this date not be good for you, our secretariat is available to find another suitable options together with your staff.

Sincerely yours

Oliver Grün

- PIN-SME President -

- Präsident & Vorstandsvorsitzender Bundesverband IT-Mittelstand e.V. (BITMi) -

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