

Source: IEEE 802 LAN/MAN Standards Committee<sup>1</sup>

To: Gary Hoffman  
IEEE Standards Association President

From: James Gilb  
IEEE 802 LAN/MAN Standards Committee Chair

Subject: Current status of ISO/IEC/IEEE PSDO agreement

Approval: Approved by IEEE 802 LMSC ballot, TBD

Dear Mr. Hoffman

### **Executive Summary**

IEEE 802 LAN/MAN Standards Committee (LMSC) has been participating in the International Organization for Standardization/International Electrotechnical Commission (ISO/IEC) Joint Technical Committee (JTC) Partner Standards Development Organization (PSDO) process for many years. While this has been a successful program in the past, with many IEEE 802 standards jointly published as ISO/IEC/IEEE standards, there have recently been issues which prevented some IEEE 802 LMSC standards from successfully progressing in this process and gaining ISO/IEC standards status.

The purpose of this communication is to

1. Make you aware of the importance of the ISO/IEC adoption of IEEE standards.
2. Request a closer cooperation between IEEE 802 LMSC, IEEE SA Board of Governors (BOG), and IEEE SA staff to resolve these issues
3. To encourage a continuous exchange of information between IEEE 802 participants and the IEEE SA BOG regarding this issue.

### **Description of the importance of ISO/IEC adoption of IEEE standards**

The breakdown of the JTC 1 PSDO process for some 802 amendments and standards is a complex issue that is beyond the scope of the IEEE 802 LMSC, however, it is affecting the market and value of IEEE 802 LMSC standards and therefore needs to be addressed.

It is the responsibility of the IEEE SA to address this issue and either provide a means for all IEEE 802 LMSC standards to be published as ISO/IEC standards or another means to allow IEEE SA standards to be recognized as international standards that may be used as normative references worldwide. Solving this issue will greatly increase the value of IEEE SA standards for commercial adoption and governmental recommended practice as recognized international standards. The current IEEE SA position of saying the issue

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can only be resolved by other external organizations changing their behavior is unacceptable as it leaves the international viability of IEEE standards in the hands of organizations that may not sufficient motivation to change the status quo.

There are many instances where international recognition of IEEE SA standards has made a significant impact. An example is given below:

#### *EEA market certification of IEEE 802 related products*

Placing products on the market in the European Economic Area (EEA) requires that they are compliant with requirements expressed in Harmonised Standards (HSs). If an HS is listed in the Official Journal of the European Union (OJEU), a manufacturer may use the HS to perform a self-assessment of their product's compliance. If the manufacturer finds their product to be in compliance with the HS's requirements, the manufacturer may issue a Declaration of Conformity (DoC). Once the DoC is issued, the product may be placed on the market in the EEA. No other certification of compliance is required.

If a product is not "covered" by an HS, products must be certified by a conformity assessment body (denoted as notified body) in the EEA before the product can be placed on the market in the EEA. Certification by a notified body is a much more complicated process for the manufacturer than issuing a DoC; certification creates a financial and time-to-market impediment for manufacturers placing products on the market in the EEA.

The European Commission is the sole authority that may list HSs in the OJEU. The EC lists HSs in the OJEU's L-series that contains legislative acts including decisions, directives, regulations, etc. The EC has stated that it is bound by the World Trade Organization's (WTO's) Technical Barriers to Trade (TBT) agreement, and thus, the EC does not include any HS in the OJEU if such HS contains normative references to standards developed by Standards Developing Organizations (SDOs) other than ETSI, CEN, CENELEC, ISO, ITU, or IEC. Unfortunately, the IEEE SA is not recognized as an SDO by the EC and therefore IEEE SA Standards may not be used as normative references in the EEA. However, if an IEEE SA Standard is published as an ISO Standard, it may be used as a normative reference.

The first version of HS EN 303 687 (Wireless Access Systems including Radio Local Area Network operation in the license-exempt 6 GHz band) contains a normative reference to IEEE 802.11ax-2021. The EC explained to ETSI that because of this normative reference the EC will not list this HS in the OJEU or list this HS with restrictions. Until a revision of HS EN 303 687 is listed in the OJEU without restrictions, manufacturers will not be able to use HS EN 303 687 for self-assessment of their products, Therefore, manufacturers currently wanting to place Wi-Fi 6E equipment on the market of the EEA need to seek so-called notified bodies to approve their products by time-consuming and costly compliance assessments.

Because ISO has not adopted IEEE 802.11ax-2021 as an ISO standard, it cannot be included as a normative standard in the upcoming revision of HS EN 303 687, and ETSI has been forced to develop a revision of HS EN 303 687 that avoids normatively referring

to IEEE 802.11ax-2021. This degrades the value of the IEEE standard and requires other bodies and/or SDOs to provide requirements similar to or identical to those in IEEE standards, so that the requirements can be used in HSs. It would be much simpler if IEEE 802.11ax-2021 could be published as an ISO standard.

I think you will agree that the success of the PSDO process for the adoption by ISO/IEC of IEEE standards is very important to IEEE 802 and IEEE SA in general. IEEE 802 would like to help in any way that we can to improve and maintain the process. IEEE 802 would also like to have regular updates on the progress that is being made.

Sincerely

James Gilb

IEEE 802 LMSC Chair

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