

FOSSCOMM position paper on Drafts eGovernance Standards Policy

FOSSCOMM believes that the Draft Standards Policy e-Governance Standards, ver 2.0 that was tabled at the Second meeting of the Apex Body on Standards for eGovernance that was held on 17th June 2009 has been very well framed and will encourage innovation while ensuring a technologically and financially sustainable e-governance rollout.

We believe that the policy is an extremely well drafted policy evolved by the Government and the policy will help save valuable tax payer's money from being wasted and in creating sustainable e-governance assets. Such money can then be used to build social infrastructure such as schools and hospitals. However, we have some concern with two sections of the policy.

Specifically, we believe that adopting Multiple Standards in any way will greatly damage the critical e-governance infrastructure of the country and would also increase its vulnerability.

FOSSCOMM fully supports the requirement for a Single standard for a single technology area and requirement for Royalty free standards. This will also ensure sustained interoperability as technically it becomes exponentially more complex to maintain interoperability when there are multiple standards.

In addition, we believe that the concept of multiple standards is an oxymoron as by definition, a standard is a single standard otherwise we need not have standards. A logical query to the concept of multiple standards would be how many multiple standards should there be. Should there be infinite multiple standards ? In which case, we need not have a policy on standards at all.

True competition can be brought in by having multiple vendors, multiple solutions and multiple systems that all operate on the same standard, thus providing true choice to the Government. Single royalty free standards have been the key driver for the widespread growth and acceptance of the Internet. Attempts by firms that had monopoly over the PC's to create proprietary standards for the Internet have earlier been strongly rejected by the user community and that has ensured continued growth of the Internet in a participative and non-discriminatory manner.

We also believe that adopting standards that are not Royalty free will compromise the Technological Sovereignty of the nation.

Insofar as Royalty free standard is concerned, the policy clearly indicates that in case a Royalty free standard is not available, as a next choice, "Reasonable and Non-Discriminatory" (RAND) and "Fair Reasonable and Non-Discriminatory" (F/RAND) should be considered. However, it is definitely not in the nation's interest to have a royalty regime achieved by introducing encumbered standards, however Reasonable or Unreasonable, Fair or Unfair the terms of the encumbrance(s) be.

Innovative standards can be experimented by Bureau of Indian Standards and they would only be referred to the e-Governance Standards Policy document from the point of their consideration as national standards.

FOSSCOMM would however like the document to be further strengthened by removing the section that permits multiple standards under circumstances where the second proposed standard is completely compatible with the existing standard and has some new features [Section 6.4]. This is on the grounds that if the second standard is completely compatible with the first standard and has some extra features, then it is actually a superset of the previous standard and should therefore completely replace the previous standard provided it meets the remaining criteria laid out in the policy document. Mathematically, if two standards are fully compatible both ways, then they are the same standard. Under no circumstances should eGovernance in India have more than one standard at any point in time. This would be detrimental to the applications developed under e-Governance.

In addition, if the first standard is a truly open standard that has been developed participatively, then automatically it should grow to incorporate all the reasonable requirements of the community and will therefore automatically incorporate any new feature that is required. We are not aware of any case till date where an Open Standard had to be replaced by another Open Standard for exactly the same technical area.

Overall, we feel that the draft policy is visionary in nature and has appropriately given the highest preference to having a Single Royalty Free standard for each technical area. This would go a long way

in having a sustainable e-governance solution.