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## Position Gartner report on EIF revision and alternatives for EIF 2.0

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One of the core missions of FFII is to promote and defend interoperability in IT as a technical way to get and preserve free markets with real competition. Based on this mission, we are pleased by the opportunity to make comments on the Gartner report on a potential EIF revision.

First of all, we fully agree with the remarks by Karel De Vriendt who highlighted the importance of the EIF 1.0 for the market as a whole. As a frame of the interoperability debate it is highly respected among administrative officials, industry and civil society and often quoted by politicians. In a recent Bundestag debate on document exchange formats EIF compliance was widely discussed. An update has to **stay in the line of EIF 1.0 and build upon this success model**. A frame for public administration has to ensure long-term reliability in a way to warranty the value of the already made investments by many public administrations in Europe. So any changes of an EIF 2.0 have to focus on the flexible implementation and dissemination of the EIF 1.0 while leaving its core uncompromised.

Starting from that principle, the Gartner report proposes an „EIF 2“ which is **not backwards compatible** with the EIF 1.0. In fact it replaces the EIF by an entirely different concept of (interoperable) aggregated Generic Public Services performed by public private partnerships that requires a complicated certification infrastructure. Gartner does not focus on aspect of interoperability but on public eGovernment services that is a quite different issue no matter if interoperability should be a must for any eGovernment service. The proposal includes security services which lie in the competence of ENISA and are sufficiently high-level regulated and standardised. Gartner wrecks the unique positive aspects of the EIF, namely its **applicability and practical use**. It also ignores the toolbox character of IDABC activities in a lose chain with diverse national projects which makes IDABC activities more useful than the actions of other European

level programs. The misapplication of the „Web 2.0“ concept [p.iv] as popularised by Tim O'Reilly casts serious doubts about the expertise of the Gartner group. More severe becomes the problem when the consulting firm writes about interoperability, the core of the EIF.

According to Gartner interoperability is **redefined as 'collaboration'** in an extraordinary broad fashion, for instance it says

*„Interoperability means the ability of different organizations to effectively communicate in order to enable service provision: this implies that their respective processes, information assets and technologies are able to communicate.“* [p. iv]

or even broader, with the important notion of „ability“ removed.

*„Interoperability means working together – collaboration of systems, services and people“*  
[2.1.1]

The notion of interoperability in the Gartner EIF 2.0 public services proposal becomes a decorative phrase that can be easily exchanged for „good“, „quality“ or „innovative“. Gartner seems to perceive that interoperability and collaboration are narrow related concepts which is a fundamental misconception based on an oversimplification. In the annex the correct terminology is used, same applies for the EIF 1.0 section 1.1.2. The inconsistency of Gartner's multiple terminology proposals, in particular in the context of clear EIF definitions, is remarkable.

The original term of interoperability originates from NATO members defence policy and procurement. In the context of the EIF 1.0 interoperability is narrowed to interoperability of data exchange [cmp. p 2 or EIF 1.0 1.1.2] which is perfectly in line with the scope of IDABC, market needs and the data procession markets. The Gartner group takes away all the pragmatism and focus of the EIF 1.0 and starts a **redesign with blurred terminology**. If a broader interoperability term is really wanted it needs to be framed in the context of a procurement strategy of services and market order (pre-emptive means of competition policy) and could extent to other fields such as railways and telecommunication. The Gartner report does not discuss these **ordo aspects** and economic welfare effects through efficiency gains respective economic welfare loss through lack of interoperability. The analysis in section 2.2 about interoperability barriers is not only insufficient but baseless. It looks like it is re-used content (*„this essay will present“*, p. 10), features unpragmatic off-topic analysis or mere anecdotal examples (p. 11 Dutch customs).

Many shortcoming of the Gartner study are closely related to the methodology. Section 1.3 describes the methodology that is not neither scientific nor followed by those who conducted the study. A weakness of the EIF 1.0 was a lack of an interest analysis. Of course the efficiency goal of more interoperability is not shared by stakeholders who benefit from a lack of interoperability, whose market positions are challenged by the drive of administrations towards more interoperability. **The Gartner report does not take that into account but takes over positions which serve the sole purpose to undermine the effectiveness of the EIF.**

Even more the Gartner report **overtakes the lobby jargon** of well-known commercial interests from third countries who aim to undermine the objective of interoperability sought by the EIF 1.0 and incorporates them in their own recommendations.

– The call for „*true leadership*“ suggests that the action required a more high level approach. It

also implies a lack of „true leadership“ in the current EIF which is of course true: IDABC is known to respect the principle of subsidiarity, to understand the duties of public servants, the role of public services and to do „real work“. In international diplomacy „true leadership“ is an euphemism of insignificant governance activities.

- shift from technical to semantic focus (2.3.3) – ironically the Gartner proposal is an expression of these interests to blur the objectives.
- *„Neglecting the legacy and evolution of standards — EIF v1.0 has a strong focus on the proliferation of open standards. This is quite understandable given open standards legislation and from a long term perspective. However, this focus ignores the fact that existing standards may represent an operational legacy and migrating to open standards may require significant investments and time without delivering new value. Besides EIF v1.0 does not mention the world-wide best-practice to support multiple standards simultaneously in order to prevent vendor lock-in and sustain innovation.“* (Gartner p. 23)
  - while realism indicates that there are multiple standards (most of them “de facto” standards, not ratified by any official entity, neither indeed disclosed -check current “Microsoft vs. Commission” court case-), remarks like these are targeted to delay the migration towards open standards and the promotion of openness in standardisation. A „*not now*“ translates into a „*never*“. Given the complexity and duration of standard migration we can't see any rush towards open standards. It is a slow process to market efficiency and free market. Indeed, Gartner is maintaining that low barrier entry and open competition that open standards will bring to the market is not “*delivering new value*”. Could Gartner explain why the IT market is different to other markets where open standards deliver real value, quick innovation, low cost, low entry barrier and finally growth in economy, via the wide competition they generate. Gartner is arguing actually that that free competition doesn't bring any “*new value*” to market. Where is the economical study that demonstrates that argument?
  - avoid lock-in by multiple standards? – A „*lock-in*“ is an ex-post dependency and indicates that an inefficient decision was made. But you cannot take an ex-ante perspective. There is basically no „*lock-in*“ problem of open standards or a competition problem of „*standards as such*“. The essence of open standards is that they actually avoid a lock-in dependency to dominant vendors. Exactly the contrary that Gartner maintains.
  - contrary to the claims the EIF 1.0 does take sufficiently account of legacy standards. „*Competition between standards*“ is no objective of standardisation, it is competition between vendors and its products and services. Competition between standards bring nothing good except confusion to consumers and extra costs to producers.
- *„Gartner recommends not to focus on the use of open standards per se. Whether open or not, standards are to further the deployment of public services.“* (p.28)
  - a not open (closed and proprietary) standard used by an administration when there are alternative open standards available, is only forcing to the citizens and business to be customers of the owner of the standard to be able to interoperate with such an administration. An administration must not force anybody to contract the same vendor as it has chosen to exercise the public democratic right and obligation of to interoperate with it. But this is what is got when you use non open standards as the report promotes. Gartner is not taking that into account, when actually that principle is stated in laws and administrative rules from many Member States. It is a right of every European citizen or business to be allowed to choose its own vendor when having to interoperate with its public administration.

Technically this right can be warranted via open standards. Gartner proposals are just trying to nullify that right for the sole benefit of few well established suppliers.

- „*Interoperability is placed in the context of subsidiarity.*“ (p. 51)

The research in the member states indicates that Gartner's model **does not serve their needs**. The recommendations of Gartner cannot be derived from the research among primary stakeholders as found in section 2.3.1. The interests of the supplier community are, generally speaking, irrelevant in an administrative procurement and implementation context. Interoperability enforcement aims to strengthen the demand power of public services, identify strategic dependencies and promote more market-efficient and flexible allocations. Open Standards, as the crown of standardisation, are an ideal concept as a free market or free trade. Weakening the concept will provide no benefit to reach the efficiency and flexibility gains through more technical interoperability. A laissez-faire approach of „multiple standards“ needs to be contrasted by an *ordo* approach in which a preference encourages market players to open up. The EIF 1.0 take sufficiently account of legacy standards and standard re-use. Without a credible thread of force no interoperability progress regarding legacy formats is to be expected which is always a matter of negotiation tactics as well. If it is not possible to ensure a sufficient strong position the aim becomes to reduce lock-in dependencies on legacy formats. Endorsement of Open Standards is a strategic means.

Of course instruments should be developed to **review the openness** of other standardisation procedures and promote openness in standardisation. We think that the Danish proposal points into a right direction. Development of standard rating tools, standard openness evaluation or web tools that support an open review of standards are examples of useful potential EIF2.0 toolbox instruments. These toolbox elements of an EIF 2.0 can be developed both on the national and European level and be targeted for adoption and reuse by other interested parties and members.

This would not mean „*building on the many effort of standardization bodies that already operate*“ (p. iv) but meta-standardisation review in the lights of the **WTO Technical Barriers to Trade** agreement objectives, an agreement which is still not sufficiently implemented in national legislation compared to other achievements of the Uruguay round such as TRIPs. GATT can also be an inspiration for the long-term promotion of interoperability.

The development of „*true executable guidelines*“ (p. 12) should be fostered by a supportive EU legislative act as the foundation, EIF update as the architectural frame while the toolbox approach is used to develop guidelines and a bazaar of solutions is created, targeted for re-use and adjustment to local needs.

Open Source is an essential aspect. For instance the provision of the EU consultation web service software under the EUPL ensures that it can be applied and reused by members states. This bazaar concept can also be extended to EIF interoperability check-lists, standard review models and dependency analysis etc. These tools can be developed both on the national and European level. It is apparent that the focus of national eGovernment policies is very much different. The exchange of tools such as the adoption of, for example, German SAGA tools or Spanish Electronic Administration Law, by other nations is promising.

Joint re-use of methods ensures a non-mandatory decentralized cooperation. A bazaar methodology

is very common in the market. The development and application of consulting expertise in companies as Gartner is not so much different [cmp. re-use of the Hype Cycle]. Administrations have similar needs. Market research such as a study or sheet which compares existing web forum software would make sense on the EU level if it helps multiple parties in their procurement decisions. However, it is not significant if such a sheet was developed by the EU or the UK or a town council or the Wikipedia community. It is useful for all. In the same way EIF tools would comprise for instance EIF training and workshop material, EIF interoperability consultancy models and check-lists. The bazaar concept would close the alleged subsidiarity divide as exemplified in 2.3.1.

The Bazaar model does not require further governance beyond agreed terminology and interoperability objectives. A more strategic perspective would be to set a tangible interoperability goal for public administration and require annual implementation progress reports. Such a goal could be the adoption of precise open standards or support of certain document formats. Because of our bazaar vision we do not see any need for „governance“ beyond the EIF 1.0 guidance.

Interoperability knowledge is scattered across many projects, people and DGs. Several DGs have the same objectives but are not cooperating. Although we identified a number of centrally directed/facilitated approaches, the majority of projects is neither **guided nor monitored from a higher level** within the EC. This fragmentation leads to **suboptimal solutions** and does not contribute to the ultimate goal of EIF: "*Public Services Where Needed*". (Gartner p.18)

In fact the „goal“ of „*public services where needed*“ is not the goal of the EIF but the wet dream of Gartner about EIF 2.0 objectives that have **nothing to do with interoperability**. That is why the Gartner Research (2.6) does not address interoperability but something entirely different. The „goal“ of the EIF is in fact **developed by Gartner itself** in section Mission Statement 4.1(p.30) and associated with the remark:

We discourage proposed additive verbs like 'facilitate', 'promote', 'support' as they induce service-push that may not be needed at all.

It does not really require „*strong leadership*“ (p. 29) to determine the source of the Gartner attempts to obstruct the EIF.

**Section 3.3 on Standards is absolutely unacceptable and contravenes the EIF objectives. It takes account of the most indecent Orwellian newspeak of the enemies of the EIF. Subsequently the Gartner EIF 2.0 proposal in section 5 is unacceptable and has no any factual neither scientific base in which to sustain itself. It is only the expression of the wishes of a few predominant suppliers against the rest of the market players and citizenship rights and against the purposes that originally developed the EIF itself.**

We strongly disagree with that blunt attempt to weaken the EIF and the its primary focus on interoperability promotion. We suggest the Commission to review its cooperation with Gartner group or ask them to deliver a report which follows administration interoperability objectives and is

in line with the EIF. The report often speaks of Gartner recommendations or positions („fully supports“, „has two main reservations“, „still we like to emphasize that EIF 2.0 should support multiple standards.“). While this is a position paper, the Gartner study should not be a position paper but a study and focus on the interests of the public administration only.

We believe the EIF 1.0 as-is is to be preferred over the incompatible Gartner EIF 2.0 update proposal. It is worth to read the EIF 1.0 again that is so much better and addresses today's needs as much as it did when it was drafted.

Gartner's proposals are just an step back against true interoperability and European citizens rights.

FFII vehemently asks for the continuation of the basic principles and targets stated in EIF 1.0 in a way to warranty interoperability without discrimination and the continuation of the development of a free, innovative and competitive IT market in Europe backed by its public institutions.