

INITIATIVE FOR SOFTWARE CHOICE

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VIA FACSIMILE 617-727-2779

Mr. Eric Kriss  
Executive Office of Administration & Finance  
State House, Room 373  
Boston, MA 02133

October 20, 2003

Re: Massachusetts Open Standards IT Policy

Dear Secretary Kriss:

The Initiative for Software Choice (ISC) which is managed by the Computing Technology Industry Association (CompTIA), having a combined membership of 175 companies in Massachusetts thanks you for meeting with members of the IT community on October 8 to share your perspectives on the future of IT procurement in the Commonwealth of Massachusetts.

Recent public statements from you and your officers have caused apprehension in the Massachusetts IT industry. Some statements seem to indicate that you were adopting a policy of software procurement that would exclude the vast majority of Massachusetts software companies from bidding on government contracts. This apprehension may have been caused by a misunderstanding due to a lack of meaningful public-private dialogue. Such dialogue can be extremely beneficial in informing complex policy decisions. We respectfully urge you to establish an open process that will facilitate a balanced discussion of your wide-ranging policy proposals, not only ensuring that the most cost-effective IT solutions get procured for Massachusetts, but also that taxpayers and the Massachusetts IT industry benefit too. The meeting you participated in with the MA Software Council on October 8 was a step in the right direction and your commitment to hold further talks with industry is encouraging to the extent those talks are open to all interested parties.

In light of your comments on October 8, we understand that Massachusetts wishes to enhance IT interoperability and seeks to move toward open interface standards to accomplish this goal. We also understand that with respect to future IT procurement, the Commonwealth intends “where possible, to evaluate open source software on a level playing field with proprietary software.” And to “implement the most cost effective solution that offers the best technology.”

We agree that interoperability is a critically important feature of complex IT systems. While we believe that no new policy is necessary for the Commonwealth of Massachusetts to meet this stated goal, it is nevertheless important that any new policy adhere to the following principles:

- Where interoperability is fostered through open standards that can be implemented in multiple platforms and technologies, all IT vendors have incentives to develop products and services that encourage innovation, enhance competition and expand IT consumer choices.
- Open standards should specify objective performance requirements rather than the use of particular technologies. They should allow for implementation using alternative, equally suitable standards that can be implemented across a wide range of technology platforms.
- Open standards should be developed through a consensus process that is publicly available and that can be implemented by any and all parties on reasonable and non-discriminatory terms.

Whether a specific standard qualifies as “open” has nothing to do with the software development model used to implement the standard. It is equally possible for an open standard to be implemented in proprietary software as in open source software. Thus any new policy developed should recognize this critical distinction in terminology to ensure a platform neutral result.

This issue is of critical importance to both the ISC’s 260 global members as well as CompTIA’s 175 Massachusetts members. An ill-conceived policy could have a number of serious repercussions including harming small software vendors, resellers and other commercial IT companies and workers in Massachusetts. For this reason, we remain most interested in working with you and your staff to provide industry input as this process moves forward.

Yours sincerely,

Bob Kramer  
Executive Director – ISC