

## COMMENT on the draft of the European Interoperability Framework V.2.0

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I am replying as the chairman of the Open Source Consortium, a UK trade body representing anyone with an interest in Free and Open Source Software ("FLOSS").

In an information society and a knowledge economy, true interoperability as you have proposed here, provides a number of essential safeguards for users of all services, including complete freedom of access to the information we have created and a guaranteed ability to interoperate with public and other services.

The network effect arising from widespread public sector implementation of interoperable service is demonstrable by the effects of the current situation where many public services are either accessible only by using proprietary implementations or awkward to use unless one uses proprietary implementations.

True interoperability prevents lock-in and so enables choice and innovation.

Accordingly we welcome this comprehensive document that, a welcome development of the original document. We think it addresses all of the main issues concerned with the important area of interoperability.

We were particularly pleased to see the issue of software patents addressed in a manner that prevents them being used to hinder competition rather than the original purpose of patent law, to promote innovation.

We are concerned about the current state of the standards process, as evidenced by the recent ISO process relating to a standard that no-one implements "Open XML" which appears to be achieving full recognition in spite of safeguards in the standards process rather than because of them.

We consider this to be an area that could usefully be reviewed at the European level.

Yours sincerely,

Gerry Gavigan