

# QUANTUM INDUSTRY COALITION

December 6, 2021

*Via electronic submission at <http://www.regulations.gov>*

**Subject: Comment of the Quantum Industry Coalition Regarding the National Institute of Standards and Technology Study on People’s Republic of China (PRC) Policies and Influence in the Development of International Standards for Emerging Technologies**

**Reference: 86 FR 60801, Docket Number 211026–0219**

The Quantum Industry Coalition (“QIC”) appreciates the opportunity to submit these comments to the National Institute of Standards and Technology (“NIST”) in response to its Request for Information (“RFI”) regarding its study on People’s Republic of China (“PRC”) policies and influence in the development of international standards for emerging technologies.

As the voice of the quantum industry in the United States, QIC is in a unique position to provide feedback and assistance to NIST regarding the development of international standards, the importance of industry leadership in the development of such standards, and the observations of U.S. quantum companies regarding PRC standards-related activity. QIC would appreciate an opportunity to work with NIST on an ongoing basis to ensure that international standards-related issues are addressed in ways that promote U.S. quantum leadership, consistent with the nation’s commitment to openness, transparency, and equity. In particular, we would like to invite NIST to conduct a roundtable with QIC member companies on these issues in the near future.

QIC is a group of companies dedicated to maintaining the United States’ leadership in the development of quantum technologies. Our members range from start-ups to Fortune 100 companies with a variety of focuses on aspects of quantum technology, including hardware, software, and application development. We have experience working with Congress and the Administration to ensure that the United States maintains and enhances its position as the world leader in the development and commercialization of quantum technologies, while working closely with allied governments and their countries’ academic and commercial sectors.

A bipartisan amendment (#080, available at <https://science.house.gov/imo/media/doc/Posey%204609%20080%20Revised.pdf>) to the NIST for the Future Act (H.R. 4609), adopted by voice vote during the House Science, Space, and Technology Committee’s markup of the bill on July 27, 2021, provides guidance to NIST regarding participation in international standards activities in which PRC is involved. The amendment reaffirms the U.S. Government’s commitment to World Trade Organization principles for standards development processes, including transparency, openness, impartiality and consensus, effectiveness and relevance, coherence, and a development dimension. QIC supports this approach.

It is ultimately the U.S. private sector that will commercialize quantum technologies to the point that standard-setting becomes necessary. By promoting an industry-led, consensus-based approach to international standard-setting, NIST can help ensure that all stakeholders are

involved in the process and that neither PRC nor any other self-interested stakeholder can gain undue influence.

More broadly, the best way the U.S. Government can ensure merit-based global competition in the quantum sector is to support U.S.-based quantum companies to scale past the “valley of death” by providing larger programs of record for quantum within the Department of Defense, Department of Energy, and other U.S. Government entities. While R&D should continue to be a top priority, the U.S. Government should also act as a customer of U.S. companies commercializing the technology. Much of the federal funding for quantum technology remains within university and research lab programs, which are not charged with commercialization and thus standardization. U.S. companies hire the best and brightest from these universities and labs to commercialize the technology, and it is only through a vibrant quantum commercial ecosystem that the U.S. can ensure that this technology remains inclusive to a range of global partners.

QIC appreciates this opportunity to respond to the RFI. If you require additional information, please contact QIC Executive Director Paul Stimers at (202) 661-3883 and [paul.stimers@klgates.com](mailto:paul.stimers@klgates.com).

Respectfully,

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