

The Data & Marketing  
**Commission**  
Enforcing Higher Industry Standards

# Annual Report 2018/19

# The DMA Code Principles

## / Respect privacy

Act in accordance with your customer's expectations

## / Be honest and fair

Be honest, fair and transparent throughout your business

## / Be diligent with data

Treat your customer's personal data with the utmost care and respect

## / Take responsibility

Act responsibly at all times and honour your accountability

### Contents

- 3** About The Data & Marketing Commission
- 4** About the Commissioners
- 5** Chief Commissioner's Report
- 7** Complaints History
- 7** Complaints Statistics
- 8** The Complaint Process – The DMA Code Principles
- 9** DMC Artificially Intelligent –  
What Can Human Commissioners Uniquely Do?  
*Dr Simon Davey, Independent Commissioner*
- 10** Where Business Models Obstruct Good Business  
*Charles Ping, Industry Commissioner*
- 11** Look Out There Are Cookie (Laws) About  
*Fedelma Good, Industry Commissioner*

---

## About the Data & Marketing Commission

The Data & Marketing Commission (DMC) manages (accepts and hears) complaints made against the activities of the Data & Marketing Association (DMA) members in relation to the DMA Code and considers emerging issues arising from complaints to contribute advice and support to the DMA in enabling higher professional standards.

The DMC is the body which enforces the [DMA Code](#) and forms part of, and is funded by, the Association and the Advertising Standards Board of Finance (ASBOF). The DMA Code and DMC are established to give effective protection to recipients, users and practitioners of one-to-one marketing, ensuring that companies observe high standards of integrity and trade fairly with their customers and with each other. This is achieved through the investigation of complaints, direct marketing issues and practices. The DMC and DMA have also recognised the potential value of shared research or other action to build marketing understanding, awareness of industry standards and compliance.

The DMC comprises an independent Chief Commissioner, two independent Commissioners and two industry Commissioners. Independent Commissioners serve on a paid basis and industry Commissioners serve on a voluntary basis. Decisions which relate to the adjudication of complaints about a member of the DMA are taken independently by the DMC. In addition to requiring corrective action or operational changes to ensure compliance the DMC can, in any cases of serious wrongdoing, make a recommendation to the DMA Board to terminate a company's membership.

Where the DMC concludes that a member is in breach of the Code the member is entitled to appeal against the ruling. The DMC's current Appeals Commissioner is John Bridgeman CBE TD, who is appointed by the Board of the DMA.

The DMC will address any complaints against DMA members where the complaint is within the scope of the DMA Code. If the complaint is not covered by the Code, it is referred to another relevant organisation, for example, complaints which relate to TV advertising are referred to the Advertising Standards Authority. The Secretariat of the DMC aims to confirm receipt of all complaints within two working days and aims to achieve at least 65% satisfaction levels with the action taken by the DMC in relation to cases dealt with by formal or informal procedures. Every complainant is informed of the action taken and/or the outcome of investigations. In addition, the DMC aims to complete 80% of formal adjudications within three months of the first dialogue with a DMA member or any other party and register and progress complaints within seven working days. The DMC aims to have no cases reversed after action by the Independent Appeals Commissioner and no successful judicial reviews or legal challenges, and makes available key trend information on complaints as required.

Minutes of the DMC Board meetings are published on the [DMC website](#).

## About the Commissioners

All the DMC's Commissioners are expected to demonstrate sound judgement and analytical skills and have the ability to digest and make good sense of often complex cases and other materials, taking both a big picture and fine detail view. They must have the ability to work and debate effectively and adjudicate, acting objectively on the evidence applying the principles of natural justice.



**George Kidd**  
*Chief Commissioner*

In addition to his role at the Data & Marketing Commission, George is Chief Executive of the Online

Dating Association, the trade body responsible for raising standards, developing best practice and promoting responsibility in the dating sector. George was formerly Chief Executive of the Senet Group, a standards and risk-awareness group in the gambling sector and Chief Executive of PhonepayPlus. George served on the boards of the Fundraising Regulator and the Council of Licensed Conveyancers, and chaired the UK Public Affairs Council, the independent register of lobbyists. In government he was a director in the Cabinet Office responsible for regulatory policy and practices and served as British Consul in Chicago for five years.



**Dr Simon Davey**  
*Independent member*

Simon runs independent management consultancy Omega Alpha, working with organisations as a

Change Leader to transform business models, optimise processes and change cultures, bottom up and top down, to achieve better economic and social returns.

He has worked extensively in the access to justice and charity sectors, working across strategy, digital, data and change, to improve and sustain social outcomes and address and resolve systemic strategic issues. Alongside his DMC role, he is an Independent Person for Standards in

the London Borough of Bromley and a trustee of a charity.

Outside of work, Simon enjoys running, classical music and building Lego to support his strategic thinking.



**Fedelma Good**  
*Industry member*

Fedelma is co-lead of PwC's multi-disciplinary Data Protection, Strategy, Law and Compliance practice in London.

She has expertise and experience in a unique combination of technology, marketing, regulation and information governance issues but is particularly recognised for her digital marketing/e-privacy knowledge. She has chaired and contributed to a number of industry working groups including, for example, those relating to open data, cookies and the development of best practice guidelines for the use of data for marketing purposes.

Until December 2015, she was a board member of the UK DMA, she is an honorary fellow of the IDM and a frequent presenter at data protection, privacy, e-privacy and information governance conferences across Europe.

### Rosaleen Hubbard



*Independent member*

Rosaleen Hubbard is the founder and Senior Partner of Towerhouse Consulting LLP, a law firm specialising in the provision

of legal and policy advice to business and regulated sectors. She is named by 'Who's Who Legal' as one of the UK's leading telecoms regulatory lawyers.

Rosaleen has a particular interest in consumer policy. She was a founding Council member of The Ombudsman Service. She is a graduate of the Aston School of Business and qualified as a solicitor in 1986.



**Charles Ping**  
*Industry member*

Charles is an established leader in data and marketing and is the founder of Charles Ping Associates,

advising both clients and agencies on marketing, strategy, leadership and regulation.

He has worked at a senior level as a client, a supplier and in the agency world. He was most recently Chief Executive and Chairman of Fuel Data and UK board member of Engine.

Charles is a former Chairman of the Direct Marketing Association and is a Non-Executive Director for the Advertising Standards Board of Finance (the key funding body for non-broadcast advertising self-regulation) and sits on the Governance Board of the Data Protection Network.

Outside of work Charles lives in Suffolk and enjoys film, classical music and rebuilding and racing vintage cars.

# Chief Commissioner's Report

by George Kidd



This will be a first and last Annual Report message from me.

It is the first Annual Report from us as the Data & Marketing Commission, a change of description to mirror changes as the Direct Marketing Association became the Data & Marketing Association. It is also my last report as Chief Commissioner having definitely

served my term of office!

What has changed over these years? Much; yet much is still the same. Nine years ago, minutes of a DMC meeting reported discussions on the place for ethics in regulatory models, the use of 'soft power' to influence behaviours and tools to test the effectiveness of self regulation. That was a pretty enlightened conversation given how things are turning out.

The changes we have seen in terms of codes, rules and regulations and our role has been considerable. Until now remit has been based on the membership of the Data & Marketing Association who appoint and support the DMC. That made sense. The Code we enforce is owned by the Association and signed up to through memberships. To regulate a body needs consent, as we have through this arrangement, or a clear recognised enforceable mandate from some statutory body.

But our roles and relationships have changed, and may change again. Ten years ago the complaints seen at DMC were likely to relate to disputes between individual consumers and leading brands: brochure and catalogue businesses back in the day. There is nothing funny when the wrong garden furniture gets delivered or arrives damaged, but resolving these issues often had the Commission acting as a sort of Ombudsman settling disputes rather than as a regulator exploring the scale and cause of harms and the intent of those involved.

The issues brought to us, to the ICO and to others in the form of complaints now often reflect the imbalance in understanding on the part of businesses and customers. In Wikipedia's learned terms

*"information asymmetry deals with the study of decisions in transactions where one party has more or better information than the other. This asymmetry creates an imbalance of power in transactions, which can sometimes cause the transactions to go awry, a kind of **market failure** in the worst case".*

Not knowing the score is hardly a new concept, but it is growing and may be particularly tricky when dealing with services and/or how data is used. Issues around consent for digital marketing and for 'cold calls' come up again and again. How did that will-writing or gambling outfit get my e-mail or phone number? What link can there be between this and me using a price comparison site or completing a 'lifestyle survey' call? How much can a business know about the sites I visit and things I buy, say or do online? And how do 'they' know I constantly need online marketing for holidays in Kalkan!

The GDPR data-use regulation has helped consumers by emphasising the circumstances in which their clear unambiguous consent is required to the use of data and to the delivery of marketing material.

The Regulation also addressed circumstances in which a marketing activity can be carried out under the so-called 'Legitimate Interests' of a business or other entity. This approach, requiring a business to conduct a serious impact assessment that has to look at whether there is a fair balance in terms of how the consumer as well as the business benefits, makes good sense as it relates to mail and telephone marketing. It may, however, come as a surprise to consumers who were just getting used to thinking marketing happened only with their consent.

“ The Code we enforce is owned by the Association and signed up to through memberships. To regulate a body needs consent, as we have through this arrangement, or a clear recognised enforceable mandate from some statutory body.

---

## Chief Commissioner's Report continued

If LI is one issue AI is another. The use of Artificial Intelligence – forms of data aggregation, machine-based learning and algorithms that might customise services and offers to what seem to be my habits, preferences etc is growing fast. It is a technology with amazing potential in any field, for example in managing and delivering public services to best effect, improving health outcomes or educational standards.

Like most technologies it is one that can be used for good or bad and well or inappropriately. A marketer's ability to process data and use knowledge of citizens can deliver offers that should be relevant, valued and attractive. But, applied wrongly or without thought to what is reasonable and in line with people's expectations it could be intrusive, give offence or create or expose/profit from tapping into vulnerabilities.

Either way we are back with our friend 'information asymmetry'. How can people begin to understand how information about them can be brought together and processed? And how might people, scientists apart perhaps, be able to articulate and evidence any wrongdoing they may think is going on? What, then, does that mean for regulatory bodies? To what extent can regulation remain prescriptive if the regulator is technologically behind those it regulates?

And what does this mean in terms of compliance? Can this be based, as it is mostly now, on complaints and after-the-event investigations?

This is a time for creative thought over the future regulation of data and marketing. Many may have concluded we were moving to a centralised regime through a European Regulation that does not require the interpretation and implementation that comes with Directives.

While 'the law is the law is the law' is true there has always been great value encouraging sectors to show responsibility and vision, through forms of self and co-regulation, that allow people's concerns and complaints to be managed in a fast, proportionate and fair way, that allows state agencies to focus their limited resources on things that might be systemic or seriously in breach of laws: issues that should not be delegated. That, in simple terms, might describe how the Competition and Markets Authority and Ofcom and the Advertising Standards Authority work together to good effect.

I am sure there is the same opportunity in relation to data and marketing. The ICO has already published criteria they might use to recognise GDPR Code of Conduct monitoring bodies. The DMA took an amazing step forward in August 2014 moving from a 177 page Code to a much shortened outcome-based Code that has served us well ever since.

In the changing world of AI, data use and marketing could this, or some supplemental but still concise Code of Conduct, sit alongside forms of audit or approval and monitoring to create an arrangement that allows the sector to do much more to communicate and enforce standards?

That move from prescription to outcomes, from solely complaint-driven compliance and from statutory bodies having to assume all regulatory responsibility could be a win for everyone. It would demand a willingness to change on all our parts. Why not?

**“ This is a time for creative thought over the future regulation of data and marketing. Many may have concluded we were moving to a centralised regime through a European Regulation that does not require the interpretation and implementation that comes with Directives.**



# Complaints History

This year the Commission recorded 137 complaints against businesses in the data driven marketing sector which was a little more than last year, which recorded just over 100. The Commission’s Secretariat investigated 39 consumer complaints and 8 business-to-business complaints involving members and 90 complaints against non-members. The Secretariat referred, where necessary, non-member complaints to other statutory or self-regulatory bodies and in some cases, particularly for concerns from consumers who were unable to unsubscribe from unwanted e-mails, the Secretariat made contact with a business that lay outside of membership to inform it of its legal commitments and request that it unsubscribes the individual’s e-mail address.

When we look at possible breaches of the DMA Code, we look at whether the issue is specific to the individual complainant or possibly a symptom of a more systemic problem. We examine each case fairly and proportionately and where there are serious breaches of the Code, repeated breaches or ongoing complaints we will progress to a formal investigation which would culminate in an adjudication and an independent review from the Commission Board. There may be some cases which revert to an informal investigation if it becomes clear that the case did not merit a substantive process and formal outcome.

We will provide feedback to the DMA following formal cases, particularly if the problems we have seen have become a common practice, or where there may be a case for change in membership or compliance and where the Commission could distribute messages to its membership about Code compliance and how the Commission is interpreting the Code.

During the year in question, the Commission Board formally investigated two companies. One case involved a business-to-business direct marketing company. The DMC’s investigation had identified several serious breaches relating to the absence of contracts and supply agreements, unsubstantiated responses (to both complainants and the DMC), and lack of evidence to the DMC of due diligence undertaken in relation to the data the member sourced and supplied. Complaints also made reference to poor customer service and unprofessional conduct.

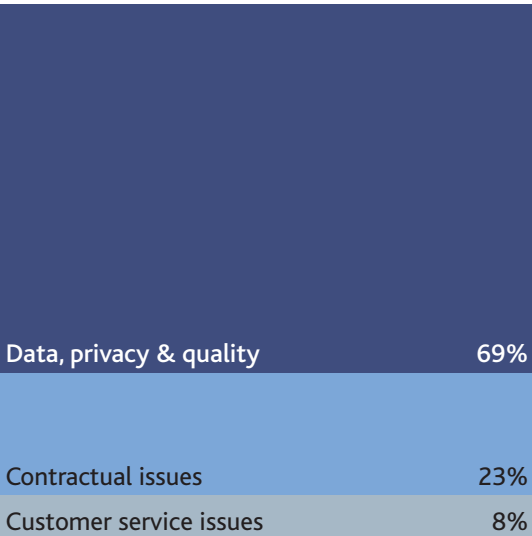
The DMC concluded that the member was in breach of a number of Code provisions and was not working to the customer first principles expected of DMA members. In response to the investigation’s conclusive evidence and the DMC’s recommendation, the DMA’s Board of Directors took prompt action to revoke the company’s membership.

George Kidd, Chief Commissioner of the DM Commission said at the time of the adjudication that “consumers and businesses need to know they are dealing with organisations that are transparent, honest, efficient and professional, but also responsive if things go wrong.”

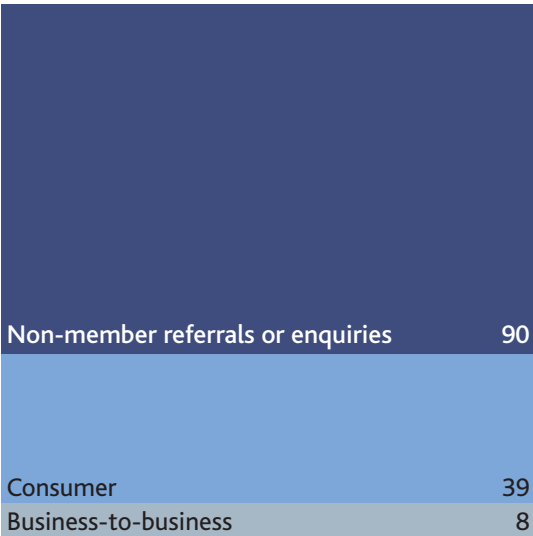
The Commission also formally investigated a mail order company following a complaint from a consumer who had subscribed to a collection set where the terms of the offer seemed to change during the period of the contract in a way that might result in an incomplete collection or unexpected and considerable additional cost.

In this case, there was a consensus to revert to an informal resolution. The Commissioners met the member and were reassured that it had committed to a change in its business model and that now, and in the future, customers would have ways of competing collections without having to commit to unexpected and additional charges.

**General Nature of Complaints (DMA Members Only)**  
1 July 2018 – 30 June 2019



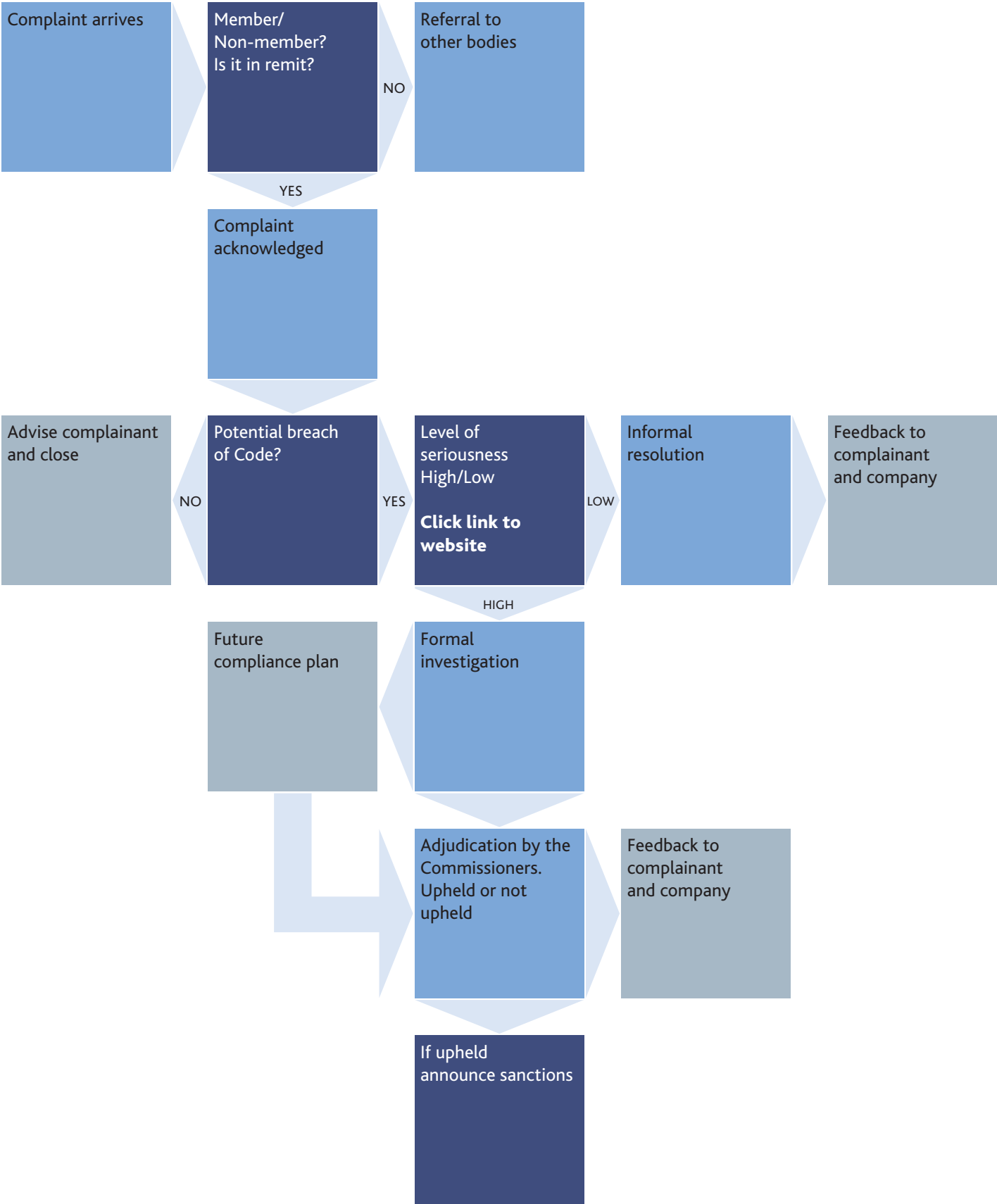
**Number of Complaints (DMA Members Only)**  
1 July 2018 – 30 June 2019



Non-member complaints are referred to organisations such as Trading Standards, Information Commissioners’ Office, OFCOM.

# The Complaint Process

The DMC investigates complaints against DMA members involving breaches of the DMA Code. It will investigate any complaint made against a DMA member that relates to one-to-one marketing activity and falls under the scope of the Code. The chart below explains how the DMC handles its complaints.





## DMC Artificially Intelligent – What Can Human Commissioners Uniquely Do?

Dr Simon Davey, Independent Commissioner



The Data & Marketing Commission, amongst other things, considers complaints against members of the DMA and often receives and reviews complaints against non-members ahead of signposting elsewhere.

In the last two years, we've done a lot of work on processes and systems, implementing a new database to improve recording structures and manage information, reviewing what we collect and how we process it, building on previous efforts to understand data journeys.

The DMC works to principles, specifically the DMA Code (<https://dma.org.uk/the-dma-code>), but a lot of the work is about a very human connection – listening and understanding. Not all complaints are purely logical narratives.

We start with principles, listen (or read) to understand, sift the information provided to understand the journey and who's involved and where the data flowed (it's always about where the data flowed) and follow up for clarification. The narratives can get quite complicated but our processes around data journey mapping, complaint structures (structured data) and decision making criteria help make sense of complexity.

It is a decision tree of sorts. Is the matter one that needs to be referred to another agency? Is it one that can be informally resolved? Is it something we should investigate deeper or run as a formal investigation and adjudication? What additional information do we need to answer these questions and reach an informed conclusion?

Of course we are an 'algorithm of sorts' but the cross section of commissioners, supported by our experienced secretariat, provides corrections to potential biases. We independently consider then discuss cases and constructively criticise each other, we bring experience and perspective from different areas (the beauty of blending independents with those with deep industry knowledge). We learn, test, debate and reflect. We can be appealed and we publish our judgements so we also hold ourselves publicly accountable.

**“ We independently consider then discuss cases and constructively criticise each other, we bring experience and perspective from different areas (the beauty of blending independents with those with deep industry knowledge). ”**

So are we better than an algorithm and what does artificial intelligence have to offer us and regulators like us?

- The principles-based approach makes designing and training an algorithm quite tricky (albeit not impossible). There are no 'rules' and we have few precedents.
- The structures of data journeys and structured data collection gives a framework but much of this is still messy. It's about people and how they feel, so it needs interpretation and clarification. There is almost never a completely clear 'wrong'.
- We deal with relatively low numbers of cases: a handful a year in significant depth and low hundreds at a lower level. There simply isn't enough data at the moment (unless someone can tell us otherwise) to build or train an algorithm. As individuals we've all learned from other experiences in messy and complex ways but that has developed a level of expertise that's not easy to replicate (the 'how did I actually get here' conundrum).
- The joy of a principles-based code is that it allows for interpretation. Can machines do principles, particularly to the degree of nuance we work to as Commissioners?
- The decision tree is getting there but still needs more work and we learn as we go, sometimes slowly. It would be difficult to automate what we have. Does that mean we haven't thought about it enough or just that our intuitive approach (and challenge and debate) haven't been clearly articulated?

It makes me think we could do more with our decision trees and improving the structure of our data, with our criteria for adjudications (which have served us well and often reinforced our 'gut' feels) and how we collect complaints in the first place.

Yet a key issue remains. Does the complainant, often vulnerable and with limited understanding of the finer points of data and marketing dos and don'ts (what is legal, ethical, appropriate, whether you like it or not), want to be in the hands of a machine? Or do they put their trust in Suzi, George, Charles, Fedelma and Simon working in concert in the aim of natural justice?

We also use our reviews and assessments of complaints to provide strategic threat assessments (what's coming up and simple trend analysis) for the DMA and the industry. Would the algorithm make those connections if all it saw were complaints and not the wider experiences we have as consumers as well as commissioners?

For now we are a human-based commission. We use technology and manage data and information pretty well, are analytical and use an evidence based decision making approach. We reinforce and enable higher industry standards through our work. The future may require greater scale than we can provide but I'm not sure we're ready for a chatbot and algorithm just yet.

## Where Business Models Obstruct Good Business

Charles Ping, Industry Commissioner



One of the key challenges in any market, is the balance between quality and quantity.

It's why in the manufactured goods sector quality control is of critical importance to production. Quality Management Systems abound, tolerances are specified, and statistically valid sampling techniques are used to

manage quality and therefore risk. However, in services markets, such as marketing and advertising, quality is quite often a subjective criteria. From a creative perspective a review of outline approaches and the subsequent backing one above the others, frequently occurs early in the process. The die is set. Conversely marketers who work with data at the heart should be in a position of advantage. The long established 'champion challenger', A/B and multivariate testing approaches should quickly hone in on the optimal solution. And in some cases, they do, but in others, they simply provide a veneer of science to a dysfunctional market.

In my years as an Industry Commissioner much of the Data & Marketing Commission's work has been involved in the cold data market, where generally the more data you sell, the more money the vendor earns. It's left up to the client to understand performance and make decisions after the event. De-constructing and analysing the performance of an apparently homogenous data set after the event is a thankless and frequently ineffective task. Generalisations and averages abound, and on the whole, average tends to be the enemy of insight. I'll take at this point an example of data collected via telephony, where in one telling conversation with a data supplier, the list complier explained that if they called a consumer and got no reply, they'd try again, and again, and again. Eventually they may reach the consumer after many days and many calls. When I asked if they ever considered that in an era where caller line identification is universal, the consumer may have been screening the calls and avoiding them, they were nonplussed. It had never occurred to them that the consumer who answered their call the first or second time might actually deliver better subsequent marketing performance for their client than one who did so after a

dozen or more calls. The reason behind this is that the business model is driven by volume, and you can bet your bottom dollar that the data supplied to the end marketer for a campaign didn't include the data point showing how many attempted calls were made to actually reach the consumer. Data driven marketing should be inherently measurable, but customs and practice are confounding real insight.

In the digital arena that age old mantra "what can be measured, matters" continues to impact how money is spent with many channels staking a claim to be the 'winning' component. Traditionally the finger gets pointed to affiliate marketing as the example of where this is most levered (again, a volume revenue model) but the whole digital marketing system is blinkered. The recent advance notice of changes to Google's approach to third-party cookies has created a wave of fear about how attribution can work in the post third-party cookie era. I'm a little more hopeful of the future. I see a landscape where techniques can evolve that incorporate all that we know about measurement, research, econometrics and testing. To a landscape that avoids solutions simply because they are easy to implement or favour the media buyer's expertise. I'd like to see solutions that start with the consumer, their interactions with all brand touchpoints, and work back from that. The move must be towards broadly accurate analysis of decision and buying chains rather than precise but inaccurate outputs derived from narrow, easily obtained data.

**“ I’m a little more hopeful of the future. I see a landscape where techniques can evolve that incorporate all that we know about measurement, research, econometrics and testing.**

# Look Out There Are Cookie (Laws) About

Fedelma Good, Industry Commissioner

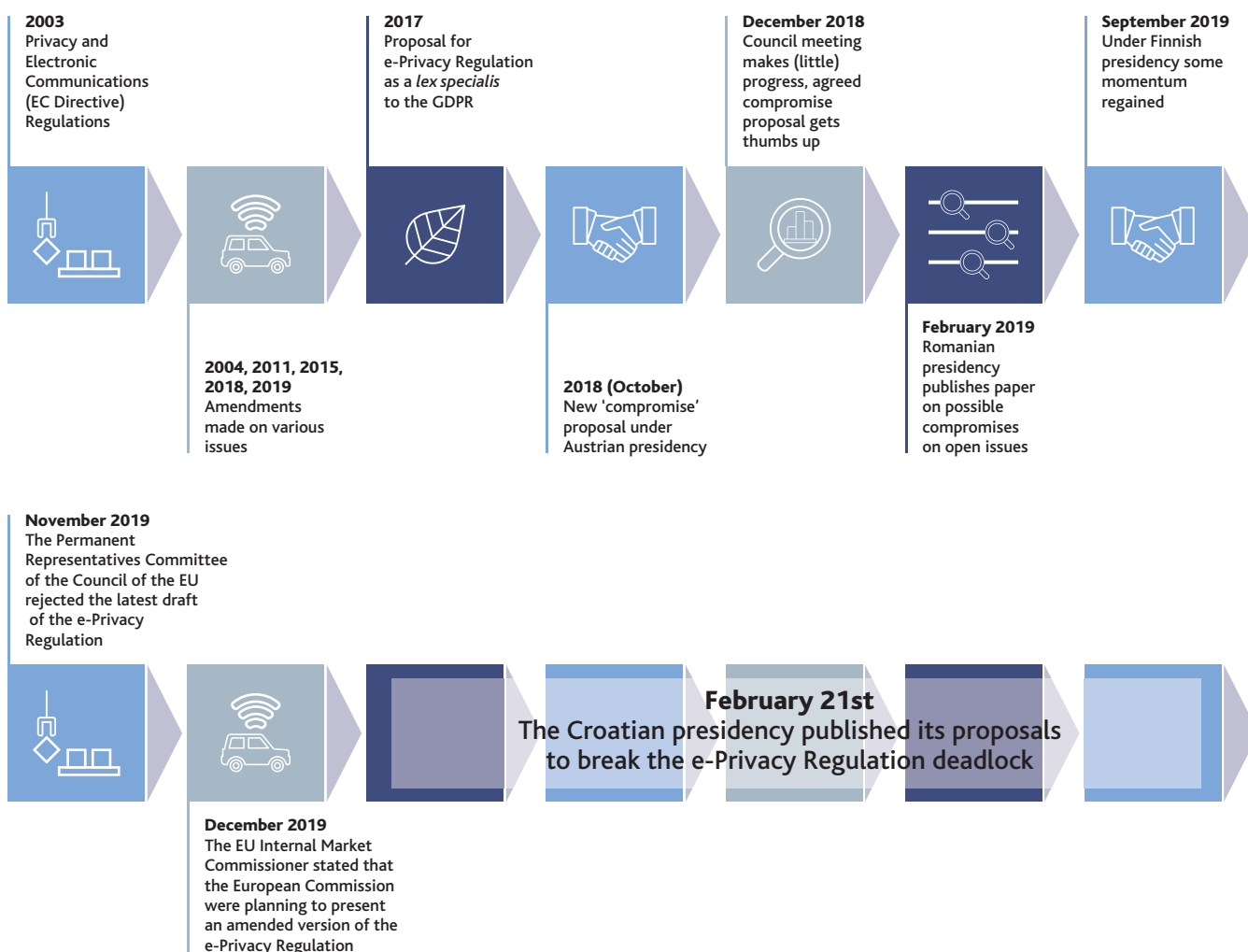


## Harmonised privacy laws?

In the run up to the finalisation of the General Data Protection Regulation (GDPR) there was great hope across Europe that agreement would also be reached about updates to the e-Privacy Directive so that both laws could be updated in tandem and issued together. Sadly, that was not to be.

Nearly 3 years on from 25 May 2018 we are still awaiting an agreement on the updates to the e-Privacy laws. On 21 February 2020, the Croatian presidency published its proposals to break the deadlock. With that publication Croatia became the 8th European country to attempt to find an agreeable way forward. That no country has succeeded so far is a clear indication of the size of the challenge. Unfortunately, response thus far to the Croatian proposal does not augur well for an agreement being reached anytime soon.

## PECR/ePrivacy update – timelines and amendments



# Look Out There Are Cookie (Laws) About continued

## What does cookie compliance look like?

But where does this impasse leave companies who wish to comply with the law, particularly in relation to their use of cookies? Can they argue that they are waiting for things to be sorted out before they make any changes to their own use of cookies? The simple answer to that question is No. The current rules on cookies must be complied with as they stand.

As commissioners we know from the questions that have come our way that there is still some confusion about what those rules require. We are also aware from research carried out in 2019 that a large number of websites are still in need of some remedial action<sup>1</sup>.

As you evaluate your own position and consider what steps need to be taken, these guidelines will hopefully help:

## PECR and GDPR

The e-Privacy Directive is implemented in the UK as The Privacy and Electronic Communications (EC Directive) Regulations 2003, commonly referred to as PECR.

PECR sit alongside the Data Protection Act and the GDPR. They give people specific privacy rights in relation to electronic communications and include specific rules on:

- marketing calls, emails, texts and faxes;
- cookies (and similar technologies);
- keeping communications services secure; and
- customer privacy as regards traffic and location data, itemised billing, line identification, and directory listings.

## Cookies (and similar technologies)

The first key thing to note is the reference to cookies (and similar technologies). PECR states: a person shall not use an electronic communications network to store information, or to gain access to information [already] stored, in the terminal equipment of a subscriber or user unless ... In other words, the law covers the reading of any information from and the writing of any information to the user's device. The term cookies is used here to cover all relevant technologies.

## Websites, apps and emails

The second key point is that the law does not just cover websites. This was made clear in the ICO's blog, 'What are the rules on cookies and similar technologies?' issued in July 2019: The use of cookies and similar technologies is not limited to traditional websites and web browsers. For example, mobile apps commonly communicate with websites and web services which can set cookies. Cookies are also commonly used in emails to track open rates etc, so they too come in scope.

## GDPR level of consent

Thirdly we have the issue of consent. The interplay between PECR and the GDPR means that when it comes to cookies, GDPR level of consent must be gained for all but strictly necessary cookies (i.e. those cookies without which your website would fail to operate).

## Other key provisions

Users must see your cookie notice when they first visit your service	Users must be told about cookies before they are dropped	Consent is required whether the cookie contains personal data or not	The GDPR standard of consent applies
You must provide users with information on the duration of the cookies	You must be able to demonstrate that you have obtained valid consent	The user must be able to withdraw their consent at any time	You must inform users if third parties will have access to the cookies

“ Can they argue that they are waiting for things to be sorted out before they make any changes to their own use of cookies. The simple answer to that is no.

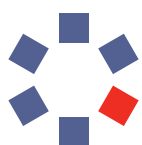
<sup>1</sup> The DMC's own website is scheduled to be updated shortly.

**The Data & Marketing Commission**

Registered Number: 6469055

Registered Office:  
70 Margaret Street  
London  
W1W 8SS

T: 020 7291 3350  
E: [dm@dmcommission.com](mailto:dm@dmcommission.com)  
W: [www.dmcommission.com](http://www.dmcommission.com)



The Data & Marketing  
**Commission**

Enforcing Higher Industry Standards