



"Dr. Adrian Fajardo"  
<DrAdrianFajardoPOBox@terra.com.pe>  
05/11/2007 01:18 PM

To innovationmetrics@doc.gov  
cc  
bcc  
Subject Innovation Measurement Federal Register Notice

May 11, 2007

Innovation Measurement  
Federal Register Notice and Request for Comments  
Economics and Statistics Administration  
U. S. Department of Commerce

Attn.: Elizabeth "E.R." Anderson  
Room 4836  
U. S. Department of Commerce  
Economics and Statistics Administration  
14th Street & Pennsylvania Avenue, NW.  
Washington, DC 20230

Dear Ms. Anderson:

The defined type of innovation, and the activities mentioned at the core of the definition, belong to the domain of complex systems whose non-linear dynamics portray more closely the behavior and interactions of agents that innovate, whether individuals, firms, corporations or organizations. If this proposition were accepted, the development of innovation metrics would face the challenge to move from the usual metrics of the present system of national accounts conventions into new metrics under the complex systems' paradigm.

The challenge is compounded if, as has been argued, one cannot directly sum micro activities into macro national accounts unless strict simplifying assumptions are made. Specifically noticed would be, in this case, the assumption that representative agents at the micro level display additive innovative behavior, continuous and predictable, as substitute for the many, varied and discontinuous, individual agents' unpredictable innovative behaviors. Such variety, discontinuity and uncertainty are at the roots of the emergence of innovations. In that sense, innovation, as the result of different agents behaving and engaging variedly in knowledge processes at the micro level require, under the complex system' dynamics paradigm, innovation to be measured at a diffusion level in the economy where a critical mass of innovation adopting agents manifest itself with macro consequences.

All of the above necessitate breakthroughs in the field of innovation metrics by exploring and crossing different disciplines of knowledge that would traverse, and probably supersede, the four major categories mentioned in the Federal Register notice. It will be a medium and long-term quest.

If the above premises, comments and suggestions are considered appropriate in the context of your Department's Innovation Measurement objectives, and feasible in the timeframe intended to reach them, I would gladly work in a more detailed submission.

Sincerely yours,

Dr. Adrian Fajardo-Christen

President

The ICON Network

E-mail: [DrAdrianFajardoPOBox@terra.com.pe](mailto:DrAdrianFajardoPOBox@terra.com.pe)