ISOT Guidance Note 006 – Comments and the ISO Commenting Template

Submitting comments on ISO standards is an integral part of the development process, and proper use of the ISO Commenting Template is vital to ensure effective participation in that process. When the template is used correctly, comments submitted on ISO ballots are automatically collated by the ISO system and appear in the same order as the document. When used incorrectly, comments need to be processed manually. This takes additional Secretariat time and resources and can sometimes lead to mistakes.

Generally, it is best to submit substantial comments as early in the development process as possible (i.e. NWIP or CD stages). This will get the U.S. viewpoints on record and give the committee adequate time to discuss and address them.

During the Committee Draft (CD) and Draft International Standard (DIS) stages, an ISO committee is required to address any comments submitted during the balloting period. During the Final Draft International Standard (FDIS) stage, any technical comments submitted will be held for consideration at the next review, so identifying issues sooner than this stage is essential.

Whenever possible, try to include a proposed change along with each comment. The proposed change should be clear and actionable and address the issue raised in the comment. It is possible that comments without a proposed change will not be acted on.

Note that the ISO Directives require technical reasons for negative votes. If technical reasons are not included with a country's vote, that vote is not counted.

When submitting comments, it's important to make sure that you're utilizing the current version of the ISO Commenting Template, which can always be found on the ISO Website (www.iso.org/forms) or on ANSI's SharePoint site (share.ansi.org/isot) in the "ISOT Voting Resources" folder.

Once you have the current version of the template, using it correctly will ensure that the ISO system can process it automatically. In the following example template below, the yellow cells are mandatory fields that must be completed for each comment.

MB/NC[1]	Line number (e.g. 17)	Clause/ Subclause (e.g. 3.1)	Paragraph/ Figure/ Table/ (e.g. Table 1)	Type of comment[2]	Comments	Proposed change	Observations of the secretariat

Template for comments and secretariat observations — Date: — Document: — Project:

The fields in the Header should be completed as follows:

- **Date** – The date that the comments are being submitted.
- **Document** – The project reference number, such as **ISO/DIS 1234** or **N789**.
- **Project** – The project ID number for the document that can be found in the ISO Project Portal.

The fields in the Body of the template should be completed as follows:

- **MB/NC** – (Mandatory field.) The two-letter country code, which for the United States is "US".
- **Line number** – If the document contains line numbers, that line number should be included. (Most ISO documents are not numbered, so usually this field is left blank.)
- **Clause/Subclause** – (Mandatory field.) The **number** of the clause that the comment relates to, or **Introduction**, **Annex #**, or **Annex #.1**, as appropriate, or if applicable to the whole document, **General**.
- **Type of comment** – (Mandatory field.) The abbreviation for the type most relevant to the comment:
  - technical (**te**) – related to statements of fact
  - editorial (**ed**) – related to spelling/grammar and layout
  - general (**ge**) – related to the logical flow of ideas
- **Comments** – (Mandatory field.) The comments and reason for the comments.
- **Proposed change** – The modified version of the clause, paragraph, section, or action that will address the comments.
- **Observations of the secretariat** – This column should be left empty. The committee's answers to the comments will be entered here after they have been considered.

Some common errors to avoid when submitting comments:

- Do not modify the template by deleting or adding columns, or by changing the width of any of the columns.
- Do not add any text or other information outside of the table.
- Do not submit more than one template per ballot, as the ISO system will only accept one template for each ballot. Multiple templates should be combined before submitting to ISOT.
- Only submit the Word version of the template. The ISO system will not accept PDFs or any other version of the template.

If the ISO balloting portal does not accept your commenting template, ANSI's ISO Team (ISOT) may reach out to you to correct and resubmit the file before the final due date. This is one of the reasons that ISOT requests that you send U.S. TAG consensus positions at least one week prior to the deadline.

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If your TAG's comments include the submission of supplementary materials, such as a graphic file, an Excel file, a chart or another document, this material can be submitted in the ISO Commenting Template by using the following steps:

1. Save the supplementary material as a file on your computer.
2. While in the "Comments" or "Proposed change" fields of the template, click on "Insert" and then "Object".
3. Click on the "Create from File" tab and then "Browse" to select the saved file on your computer.
4. Click on "Display as icon" and then "OK".

The file should now be embedded in the template, and will be accepted by the ISO Balloting Portal. ISO recommends using this method to embed the file instead of submitting a separate file (which the ISO system will not accept) or emailing it to the ISO Committee Manager, who will have to remember to manually insert it into the results after the ballot closes.

Finally, ISO provides a "Comment Collation Tool," which is available on both the ISO Website (www.iso.org/forms) and on ANSI's SharePoint site (share.ansi.org/isot) in the "ISOT Voting Resources" folder. If you have your TAG members submit comments to you on the current ISO Commenting Template, you may be able to use this tool to automatically collate the comments into one file. The tool will let you know if the templates are filled out correctly, and if so, the resulting file will be accepted by the ISO Balloting Portal.

The User Guide that comes with the Comment Collation Tool outlines the system requirements needed to use the tool and provides step-by-step instructions on how to install the tool, run the tool and troubleshoot any issues. Note that depending on your organization's security settings, you may need to involve your IT department in setting up the tool on your computer.

What this means to you as an ISO Committee Manager:

As an ISO Committee Manager, understanding the proper use of the ISO Commenting Template will not only enable you to work with the files effectively, but will allow you to educate your members, Convenors and project leaders on how to best utilize them. This will result in your receiving better quality files and lead to less need for follow-up and manual work later on.

What this means to you as a U.S. TAG Secretary:

As a U.S. TAG Secretary, you are tasked with making sure that the U.S. input to ISO standards is transmitted to the committee. By correctly utilizing the ISO Commenting Template, you can ensure that the U.S. input is automatically included, considered and responded to by the committee. Having your TAG members understand and properly use the ISO Commenting Template will make your job of organizing their input easier.

About the ANSI ISO Team (ISOT)

The American National Standards Institute (ANSI) is the U.S. member body to the International Organization for Standardization (ISO). To ensure a strong and effective U.S. voice in international standardization, the ANSI ISO Team (ISOT) acts as the primary interface for U.S. Stakeholders—between ANSI-accredited U.S. Technical Advisory Groups (U.S. TAGs) and their related ISO Committees, and as the main contact for ANSI-delegated U.S. held ISO secretariats.

ISOT daily operations include monitoring and recording of ISO documents, processing votes on behalf of U.S. TAGs, accrediting delegates to attend international meetings, nominating experts to participate on working groups, coordination with key group such as the ANSI ISO Forum (AIF), ANSI ISO Council (AIC), and the ISO Technical Management Board (TMB), administering ANSI Virtual Technical Advisory Groups (VTAGs), facilitating training programs, among many other functions. In addition to daily responsibilities, ISOT is available to assist with any committee specific issues U.S. TAGs or U.S. held secretariats may be facing. ISOT staff is well versed in the ISO procedures, ANSI International Procedures, and has experience in all aspects of the ISO process.

For organizations that are new to ISO or want additional support with ISO related activities, ANSI's ISOT staff provides hands-on, practical guidance on all aspects of administration of U.S. TAGs or ISO Secretariats through its fee-based Enhanced Services program. For more information, contact isot@ansi.org.

ISOT FAQs | Additional resources can be found on ISOT's SharePoint site (https://share.ansi.org/isot).