

## American National Standards (ANS) Process: *ANSI's Rules on Votes, Public comments & Response to Comments*

- The webinar will start at 2pm Eastern
- All participants are muted for the duration of the webinar
- Slides will be distributed to all
- Please use the CHAT option and submit to “Everyone” so all can see questions
- This session will be recorded and the recording *may* be available at a later date



## *Let's get started...*

- On behalf of ANSI, thanks very much for joining us today – we hope that you are enjoying the summer
- A huge thank you to those of you who are already involved in standards...you literally make the world a better place
- Goal for the next 60-90 minutes:
  - Identify sources of comments & requirements for responding
  - Discuss consideration of and responses to votes & public comments
  - Review relevant procedural requirements
  - Answer your questions at 3 points during the session

# Just a reminder...

## ANS-Related ANSI Staff - [psa@ansi.org](mailto:psa@ansi.org)

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# Today's focus...

## 1. ANSI's procedures:

- **Public comments** in response to *ANSI Standards Action* notice ([www.ansi.org/standardsaction](http://www.ansi.org/standardsaction))
  - Questions?
- **Voting** on ANS
  - Questions?
- **Comment consideration** – PINS, Public review and Consensus Body Votes
  - Questions?

**2. ASD's accredited procedures:** for voting, public comment and comment consideration apply and should not be inconsistent with ANSI's procedures

*ANSI Essential Requirements: Due process requirements for  
American National Standards*

[www.ansi.org/essentialrequirements](http://www.ansi.org/essentialrequirements)



# Overarching Consideration of ANS Process: Due Process

- ANSI perspective: **Due process** means that any party (organization, company, government agency, individual, etc.) with a direct and material interest has a right to participate by:
  - ✓ Expressing a position and its basis
  - ✓ Having that position considered
  - ✓ Appealing if adversely affected
- Due process allows for equity and fair play
  - ✓ Fairness, timeliness and consistency are safeguards

# Promote due process: Make effective participation easy!

- ✓ ASD's procedures are publicly available
- ✓ Consensus body members are automatically given a copy of accredited procedures and subsequent updates – and perhaps a mentor too
- ✓ New participants are directed to training resources and a contact person
- ✓ Any supplemental procedures are updated whenever revisions are made to accredited procedures
- ✓ Procedures are clear and not overly complicated
  - Not every ASD has the ability to implement complex, multi-level procedures
- ✓ Deadlines are clearly noted along with “consequences” for failure to respond
- ✓ Procedures provide some flexibility while still being compliant with the *ANSI Essential Requirements*



## Overarching Consideration of ANS Process: Due Process

- ✓ The *ANSI Essential Requirements* ([www.ansi.org/essentialrequirements](http://www.ansi.org/essentialrequirements)) in their entirety provide a framework for due process
- ✓ Proper implementation of the *ANSI Essential Requirements* **and** an ANSI-Accredited Standards Developer's (ASD's) procedures promote openness and consensus and mitigate risk that the process might be misused



# *ANSI Essential Requirements*

## \* Our focus today

- Openness (1.1)
- Lack of dominance (1.2)
- Balance (1.3)
- Coordination and harmonization (1.4)
- Notification of standards development (1.5)
- \* **Consideration of views and objections (1.6, 2.6)**
- \* **Consensus body vote (1.7,2.7)**
- Procedural appeals (1.8)
- Written procedures (1.9)
- ANSI Patent Policy (3.1)
- Commercial terms & conditions (3.2)
- Antitrust policy (3.3)
- ANS record retention/evidence of compliance (3.4)
- Metric policy (3.5)
- Interpretations policy (3.6)
- Publication (4.4) & maintenance requirements (4.7)
- Audited Designator (5.0)
- Annex A: Definitions
- Annex B: Provisional ANS

## *Good Faith Efforts* support transparency, fairness and consensus

- ***Be mindful as administrators of “Good faith efforts”***

- ✓ Availability of understandable information about the process and how to participate (If you don't understand a process, how can stakeholders?)
- ✓ Timely and clear communications
- ✓ Timely response to inquiries and proposals
- ✓ Clear and published deadlines
- ✓ Genuine and appropriate efforts to engage and address issues related to consensus
- ✓ Meaningful opportunities to participate
- ✓ Documented efforts to engage under-represented groups
- ✓ Broad and documented public notice – general, targeted
- ✓ Fair treatment for all

## ANSI's Definition of Consensus – as Consensus is the goal

- Consensus requires due process
  - More than a numerical determination
- Consensus requires
  - ✓ All views and objections be considered, and that an effort be made toward their resolution....  
**“comment consideration”**
  - ✓ *Consensus means substantial agreement has been reached by directly and materially affected interests.*
  - ✓ *This signifies the concurrence of more than a simple majority, but not necessarily unanimity.*

## Consensus Body (Voting Group, Committee, TC, Canvass List, etc.) - applicability of 1.0 & 2.0

- ANSI Definition:

Consensus body is the group that approves the content of a standard and whose vote demonstrates evidence of consensus. (See definitions, Annex A)

- ✓ Must be identifiable in a developer's procedures

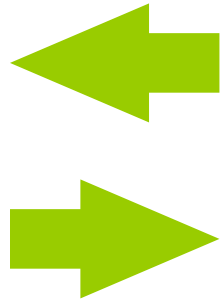
# ANSI's focus in terms of documenting consensus and compliance

- 1. Public comments** received in response to *ANSI Standards Action* announcements
  - Project Initiation Notification (PINS)
  - Public review/BSR-8
    - At least one, but unlimited **if substantive changes**
    - Text of entire document (once every 5 years)
    - Announcement of limited revisions
- 2. Vote and comments** submitted by voting members of the ANS Consensus Body
  - ***Note: distinguish consensus body from public commenters***

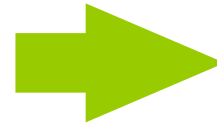
# ANS Development Cycle — What are “ANSI” comment periods?



**1. PINS Announcement;  
PINS Deliberation**



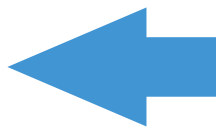
**2. Public Review: 1+  
3. Consensus vote**



**Consideration of  
Views & Objections;  
Recirculation;  
Complete SDO  
Appeals**



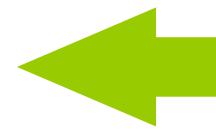
**ANSI Appeals;  
Publication**



**Approval**



**Review of  
Due Process  
Requirements**



# Sources of comments subject to ANSI's *Essential Requirements*

1. *PINS*
2. *Public Review*
3. *Comments submitted with a consensus  
body member's vote*

*Forms webinar – July 21, 2022*





## 2.5.1 Project Initiation Notification System (PINS) Comments – STEP 1

- **Notice** at the **initiation of a project** to develop or revise an ANS, notification shall be transmitted to ANSI using the Project Initiation Notification System (PINS) form, or its equivalent, for announcement in Standards Action. *Comments received in connection with a PINS announcement shall be handled in accordance with these procedures.*
- ✓ **PINS comments** require a response even if they are not claims of conflict or duplication within the ANS process, which trigger a PINS Deliberation (see 2.5, 1.6 and 2.6)
- ✓ **PINS comments** that relate to conflict or duplication require a **PINS Deliberation** and the filing of a report before you can move to public review (See 2.5.1.3)
- See PINS Guidance document
  - PINS Deliberation requirements and possible outcomes
  - PINS Deliberation Meeting Report – sample
  - Timeframes apply

# **Annex A – Sample, Use of this Form is Not Required**

## **ANSI PINS Deliberation Report – A special response to comments**

*Note: to be submitted to ANSI in accordance with the current edition of the ANSI Essential Requirements: Due process requirements for American National Standards*

1. **Date of Deliberation:**
2. **Location of Deliberation:**
3. **Deliberation Chair/Leader:**
4. **Deliberation Attendees (Name/affiliation):**
5. **Decision-making Panel members (if by panel):**
6. **Standard at issue (Designation and Title):**
7. **ANSI-Accredited Standards Developer (Sponsor of standard):**
8. **Scope of standard:**
9. **Summary of comments prompting a PINS Deliberation (or attach comments):**
10. **Summary of good faith efforts to date to resolve issue:**
11. **Do the parties agree that there is conflict or duplication? If no, summarize position of each side:**
12. **Key Discussion Points:**
13. **Outcome of Deliberation/Next Steps and Agreed Upon Timeline:**
14. **Contact information for submitter(s):**

## 2.5.2 Notification of Standards

### Development - *ANSI Public Review/BSR-8 Form - STEP 2*

- BSR-8/108 form required for:
  - proposal for new ANS and proposals to revise, reaffirm, or withdraw approval of existing ANS **in order to provide an opportunity for public comment.**
- Multiple public review announcements are required if **substantive changes** continue to be made to the draft that was first announced for public comment in *Standards Action*
  - ✓ **Comments resulting from multiple public reviews must be considered and properly handled**

## 2.5.2 Public Review - Clearly identify the text that is available for public comment

- Public Review through *ANSI Standards Action*
  - ✓ **Strikethrough-underline format is best**, with an explanation of what text is available for public comment
  - ✓ If the goal is to allow comments on a limited section only, briefly **state this in the scope of the BSR-8**, which is published in Standards Action, and on the draft itself
  - ✓ If the **entire standard** is available for public comment, state this
  - ✓ **Number the lines in the text** of the draft so a commenter can easily identify the text that is the subject of the comment

# Substantive change – What does this mean?

- **Substantive Change:** A substantive change in a proposed American National Standard is one that **directly and materially affects the use of the standard**. Examples of substantive changes are below:
  - “Shall” to “should” or “should” to “shall”;
  - Addition, deletion or revision of requirements, regardless of the number of changes;
  - Addition of mandatory compliance with referenced standards.
- ***If your procedures do not include a process for determining whether changes are substantive vs. editorial, consult the Chair or Officers or drafting group or consensus body and document the results***
- A second or third, etc., public review is required if substantive changes are made to the draft after an ANSI public review
  - ✓ You may limit a public comment period to just the change since the last public comment, e.g., a word, a phrase, a paragraph
  - ✓ It is the consensus body’s decision when to stop making new substantive changes, but any substantive change must be fully processed, **including public review, comment resolution, vote, etc.**
  - ✓ Document who makes the decision, how and why a particular decision was made as it can be challenged by a participant via a complaint or appeal, or later identified as a concern in the ANSI audit

# Sample strikethrough-underline

ExSC\_017\_2019\_ExSC TG rev to ER\_SA version.pdf - Adobe Acrobat Pro DC

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Sign In

Search Tools...

- Create PDF
- Edit PDF
- Export PDF
- Comment
- Organize Pages
- Enhance Scans
- Protect
- Fill & Sign
- Prepare Form
- Combine Files

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135 to appeal. ANSI will not normally hear an appeal of an action or inaction by a standards developer  
136 relative to the development of an American National Standard until the appeals procedures  
137 provided by the standards developer, which must be implemented promptly and with decisions  
138 made expeditiously, have been completed. However, conclusion of the appeals process at the  
139 standards developer, is not a precondition for filing an appeal with the Executive Standards Council  
140 (ExSC) of an organization's continuing accreditation status.  
141  
142 Claims of procedural non-compliance raised during the course of an active standards development  
143 process are to be addressed in accordance with the standards developer's appeals process which  
144 shall conclude before final submittal of evidence of consensus is made to ANSI in support of the  
145 approval of a standard as an American National Standard.  
146  
147 Except in the case of an Audited Designator, an appeal of the approval of a standard as an  
148 American National Standard is to be filed in accordance with the *Operating Procedures of the ANSI*  
149 *Board of Standards Review (BSR)*. Complaints concerning ANSI Audited Designators, including  
150 the approval of a standard as an American National Standard, are governed by the *Operating*  
151 *Procedures of the ANSI Executive Standards Council (ExSC)*.  
152  
153 Appeals of actions shall be made within reasonable ~~the~~ time limits specified in applicable  
154 procedures; appeals of inactions may be made at any time. Such appeals shall be directed to ANSI  
155 in accordance with the procedures of the appropriate ANSI Committee board or council board or  
156 council (e.g., Board of Standards Review, Executive Standards Council).  
157

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6/29/2020

## 2.5.2 Public Review - Clearly identify the text that is available for public comment

- A second or third, etc., public review is required if substantive changes are made to the draft after an ANSI public review
  - ✓ You may limit a public comment period to just the change since the last public comment, e.g., a word, a phrase, a paragraph
  - ✓ It is the consensus body's decision when to stop making new substantive changes, but any substantive change must be fully processed, **including public review, comment resolution, vote, etc.**
- View *Standards Action* issues for examples of revisions
  - [www.ansi.org/standardsaction](http://www.ansi.org/standardsaction)



## 2.5.2 Public Review – Clearly identify the text that is NOT available for public comment

- Attachments (or the like) to a draft that are not open for public comment should be clearly labeled as such so comments are not submitted on excluded text
  - ✓ “Only the text shown in strikethrough-underline format is available for comment at this time...”
  - ✓ “This informative reference article is not available for public comment”
    - Label this type of reference material, so it’s clear that comments are not possible

## Optional: Use of public comment forms

- Goal of public comment opportunity is to receive input
  - Please make the process for submitting comments accessible and easy – not challenging and not an undue barrier!
- ASDs **may** require the use of a particular form, or that commenters submit online/electronically
  - ASD's procedures should address this
  - Form should be useable and include instructions
  - Form should identify required fields
  - Form should explain consequences if not complete or completed incorrectly
  - Form should include a readily available contact for questions
- A public comment form should not imply that it is a ballot that gives the commenter a “vote”

# Questions?

## 1.7 Consensus Body Vote to approve ANS

- Every proposed ANS **must be approved by vote of a duly constituted consensus body**
  - The vote can be by ballot, at a meeting, or other (?), but the same comment consideration requirements apply
  - All members of the consensus body shall have the opportunity to vote.
    - On a decision to approve a document as an ANS (rule does not apply to every administrative vote taken at a meeting)
- Evidence of consensus body votes (on ANS) shall be documented.
  - ✓ All related evidence is subject to review by ANSI BSR or ANSI ExSC and ANSI Audit

## 1.7 Consensus Body Vote to approve ANS

- Evidence of consensus **shall be documented** – and is subject to audit
- **Evidence includes** dated **consensus body membership roster, interest category and vote** (including evidence of vote changes)
  - ✓ **Fair and consistent membership practices and adequate monitoring** of balance and participation require an accurate and up-to-date list of, and a record of changes to, the members of the consensus body.
    - Consider an **annual review** of membership to ensure its currency – staff review and by consensus body membership
  - ✓ Documentation when a member **resigns or is removed** from the consensus body
  - ✓ Votes of primary or alternate
  - ✓ Documentation and written disposition of comments submitted with each vote

# ANS – Consensus Body Voting by Ballot

- ✓ How the ballot question is posed matters, so be careful with the wording of the ballot
- ✓ There must be a vote to approve the standard:
  - Either in parts; or
  - As a whole (this is often cleaner, but not required if the votes on parts are clear)
- ✓ A vote to approve responses to public comments is not (on its own) a vote to approve the standard
- ✓ Whatever voting options are documented in an ASD's procedures apply - unless the procedures provide flexibility, the ASD must use the voting options specified

## 2.7 Evidence of Consensus and Consensus Body Vote - 2.7 is full of details!

- Consensus is demonstrated, *in part*, by a vote of the consensus body.
- An ASD's procedures shall state specifically how consensus will be determined.
- An **example of a numerical formula for consensus**:
  - a majority of the consensus body cast a vote (counting abstentions) and at least two-thirds of those voting approve (not counting abstentions)
  - Recommend that your procedures address abstentions and how they are counted
- ASD may submit for approval an alternative methodology for determining consensus.
  - ANSI ExSC will review and approve (or not) alternative methodologies



## 2.7 Evidence of Consensus and Consensus Body Vote

- When recorded votes are taken at **meetings**, members who are absent shall be given the opportunity to vote before or after the meeting.
  - All members of the consensus body shall have the opportunity to vote.
    - On a decision to approve a document as an ANS, not every admin vote taken at a meeting
  - This is a vote separate from a recirculation opportunity
  - If someone **withdraws a negative vote at a meeting**, record it in the meeting report, send a written email confirmation to the voter or provide a form at the meeting for the withdrawal of a negative vote (or other) – *vote changes must be documented*
  - If the **meeting report will be used as evidence of comment consideration**, then details about the consideration and the outcome must be included in the meeting report, not just, for example, “accepted in part...”

## 2.7 Evidence of Consensus and Consensus Body Vote

- ASDs **shall not change a vote unless instructed to do so by the voter.**
  - ✓ If a change of vote was not submitted in writing by the voter, then written confirmation of such a vote change shall be provided to the voter by the developer.
- It is never appropriate for an ASD to inform voters that if they are not heard from, their negative vote will be considered withdrawn and their vote will be recorded as an abstention or an affirmative.
- **All negative votes that are not changed at the request of the voter shall be recorded and reported to the BSR as unresolved negatives**
  - ✓ unless the ASD is an Audited Designator, in which case voting records must be maintained, subject to review by the AD prior to approval and ANSI audit.

## 2.7 Evidence of Consensus and Consensus Body Vote

- ASDs shall record and consider all negative votes accompanied by any comments *that are related to the proposal under consideration*.
- This includes negative votes accompanied by comments concerning potential conflict or duplication of the draft standard with an existing ANS and negative votes accompanied by comments of a procedural or philosophical nature.
  - ✓ These types of comments shall not be dismissed due to the fact that they do not necessarily provide alternative language or a specific remedy to the negative vote.

## 2.7 Evidence of Consensus and Consensus Body Vote - Comments not related

- ASDs are not required to consider negative votes accompanied by comments not related to the proposal under consideration, or negative votes without comments.
  - ✓ The ASD shall indicate conspicuously on the letter ballot that negative votes must be accompanied by comments related to the proposal and that votes unaccompanied by such comments will be recorded as “negative without comments” without further notice to the voter.
- If comments not related to the proposal are submitted with a negative vote, the comments shall be documented and considered in the same manner as submittal of a new proposal.
  - ✓ A mechanism for maintaining and tracking these comments should be established, so the proposals/comments are not lost or discarded

## 2.7 Evidence of Consensus and Consensus Body Vote - Comments not related

If clear instruction is provided on the ballot, and a negative vote unaccompanied by comments related to the proposal is received notwithstanding, or a negative vote without any comments is received:

1. the vote may be counted as a “negative without comment” for the purposes of establishing a quorum and reporting to ANSI
2. the vote shall not be factored into the numerical requirements for consensus, unless the ASD’s procedures state otherwise
3. further solicitation of comments from such a negative voter is not required
4. a recirculation ballot of the negative vote (unaccompanied by comments related to the proposal or without comments) is not required
5. notification of the right to appeal is not required (for these vote types only)
6. ASD must report these as a “negative without comment” on the BSR-9 (unless, an Audited Designator, in which case, evidence must be retained and reviewed)

## 2.7 Evidence of Consensus and Consensus Body Vote - Options

- The ASD shall maintain records of evidence regarding any **change** of an original vote.
- Except in regard to votes on membership and officer-related issues, each member of a consensus body should vote one of the following positions (or the equivalent):
  - a) Affirmative;
  - b) Affirmative, with comment;
  - c) Negative, with reasons (the reasons for a negative vote shall be given and if possible should include specific wording or actions that would resolve the objection);
  - d) Abstain.

## 2.7 Evidence of Consensus and Consensus Body Vote - Membership

- For votes on membership and officer-related issues, the affirmative/negative/abstain method of voting shall be followed.
  - Votes with regard to these issues need not be accompanied by reasons and need not be resolved or circulated to the consensus body.
  - Think about why this is the case

# Consensus Body Vote by Ballot

- Balloting is the most commonly used option and provides a clear audit trail and record
- ✓ Specify and publish ballot periods (start and end)
  - Review ballot periods regularly: are they appropriate, too long, are all uses covered?
- ✓ Ensure ballot purpose/question (and any limitation) is clear
- ✓ Identify a contact for questions
- ✓ Issue a reminder notice prior to ballot closing
- ✓ If a ballot extension is authorized, it should apply to all voting consensus body members
- ✓ Note that “negative votes without comments” will only count towards quorum if a developer’s procedures state as much, but will not be given further attention (see 2.7)



# Questions?

## 2.6 Consideration of Views and Objections - Recirculation requirement

- Each **unresolved objection** (voter, public commenter) and **attempt at resolution**, and any **substantive change** made in a proposed American National Standard shall be reported to all members of the consensus body in order to afford **all members an opportunity to respond, reaffirm, or change their vote**.
  - This is the “recirculation”, “reconsideration” requirement
  - All members of the ANS consensus body, *not just those that cast a vote on the original ballot to approve the standard as an ANS*
  - Include: 1) unresolved objections (votes and public comments); 2) attempt at resolution; and 3) **any** substantive change (related to public comments or otherwise)
  - If a voter does not respond to a recirculation opportunity, then his/her original vote stands, otherwise, the vote on recirculation trumps the original vote (see chart)
  - NOTE: a vote to approve a response to comments alone does not satisfy the recirculation requirement.

# Reconciliation of votes of consensus body for reporting to ANSI BSR/Audit verification

- How to reconcile multiple ballot tallies (NOTE: if no change to a vote is received, then the original vote stands)

<b>Original Vote</b>	Yes w/comments	Yes w/comments	No w/comments	No with Comments	Not returned	Not returned
<b>Recirculation Vote</b>	No w/comments	No w/out comments	No w/out comments	No with comments	No w/comments	No w/out comments
<b>Final Record</b>	No w/comments	No w/out comments	Original comments from original “no” vote would have to have been addressed – in other words, you can report a final vote as “no w/out comments” but you would have had to address and recirculate the original comments	No with comments	No w/comments	No w/out comments

# If you wish to “re-start” with a new ballot

- If you wish to “re-start” the ANS approval process with a new ballot and a new draft (and your procedures do not preclude this), then
  - Notify all who participated in the original/last review – consensus body and public commenters
  - Explain that the prior draft and ballot are cancelled and a new version will be issued, and that votes will be solicited anew, and public comments will be welcome on the new version
  - Explain that prior votes and comments will not be addressed
  - Provide contact information for questions
  - This should not be a routine option or undertaken lightly (the ER does not address this)
  - Ensure records are retained, subject to audit

# Comment consideration – What ANSI requires



## 1.6 and 2.6 Consideration of Views and Objections - Procedural Requirements

- **Prompt consideration** shall be given to the written views and objections of all participants,
  - ✓ including those commenting on the **PINS** announcement or
  - ✓ **public comment** listing in *Standards Action*.
- All relevant comments must be considered, even if you think the comments are not well written, not important, philosophical in nature or do not provide alternative language
  - ✓ **Written responses can be proportional and previous responses, if still valid, may be repurposed**
- If consideration of public review comments will be **delayed** (for whatever reason), then the ASD should let the commenters know this and when a response to their comments can be expected.
  - This way submitters are informed, don't feel like their comments fell in a black hole or feel disenfranchised.

## 2.6 Consideration of Views and Objections - Procedural Requirements

- In connection with an objection articulated during a public comment period, or submitted with a vote,
  - an effort to resolve **all expressed objections accompanied by comments related to the proposal under consideration shall be made**, and
  - each such objector shall be **advised in writing** (including electronic communications) of the disposition of the objection **and the reasons therefor**.
- ✓ Written response is required; verbal discussions are great and often helpful, but the **disposition with reasons** must be documented.
  - Send a follow-up confirming email and retain it

## Document how comments are addressed

- ANSI does not specify how comments are to be handled; **but** an ASD's procedures should address the comment resolution process
  - ✓ they must be followed as written
- Considerations:
  - How will informal resolutions take place?
  - Who is responsible for each aspect of comment receipt and response?
  - Who or which group will “attempt to resolve” and what steps are to be followed
  - Timeframes associated with each step



# Comment resolution

- An effort to resolve all timely objections related to the content (all or part of a document) announced for public comment or vote is required
- Inform the objector in writing of the status of their comments: accepted in whole or in part, rejected, deferred to the next revision cycle and – for all – why (reasons therefor)
  - ✓ *If the responses are posted, provide a direct link to the responses – don't just say "responses are posted on our website"*
- Response *could* include a copy of the meeting report that reflects when the comments were considered and dispositioned (if at a meeting), but if this option is used, the "reasons therefor" should be clear (not simply a record of which comments were considered)

# Consider using a “comment resolution matrix”

- A summary comment resolution matrix, which includes all comments and attempted resolutions is used by some ASDs
  - Organize by commenter or by line number (by document) or by topic or section, etc.
- Convenient and efficient way to record each comment, its disposition, and the rationale for the disposition
- Convenient and efficient way to provide such information to objectors and to include in recirculation ballots of unresolved objections
- Although not required to circulate affirmative comments, doing so can provide consensus body members with insight and potentially useful information



Template for comments and secretariat observations

Date: 4.30.2020	Document: NANO TAG N 3754-2020	Project: TS 21357
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MB/ NC <sup>1</sup>	Line number	Clause/ Subclause	Paragraph/ Figure/ Table/	Type of comment <sup>2</sup>	Comments	Proposed change	Observations of the secretariat
US	4	5.1	1	ED	since RI is defined in abbreviations section, suggest using RI throughout doc after first instance, instead of spelling out refractive index each time. Similarly, RIs can be used for refractive indices	Replace refractive index with RI abbreviation throughout text. Give abbreviation parenthetically at first instance only.	
US	4	5.1	2	ED	"random medium" is not defined anywhere	Either use a defined term or include definition in section 3	
US		5.1	Note 1	ED	in wrong location	Move after "scattering angles"	
US		5.1	Note 1	GE	"phase function or scattering diagram P(theta) * P(thetat) is normally referred to as the scattering form factor	Define property or use different abbreviation	
US		5.1	Fig 1	ED	In all figure captions, previously defined abbreviations, like for backscattering intensity, are redefined.	Do not do this. Just use abbreviations already defined.	
US	1	5.1	5	ED	"For measuring (for instance) the backscattered light intensity from the incident light it is possible to derive an approximate expression for backscattered intensity (BSI)." Abbreviation already defined.	Change to: "For measuring (for instance) the BSI from the incident light it is possible to derive an approximate expression:"	
US	1	5.1	7	ED	Author's name in citation is incorrect	Change to "van de Hulst, H.C."	
US		5.2	Para 1	Ed	"Error! Reference source not found."	Reference needs to be fixed.	
US	4	5.2	2	ED	"in comparison" poor grammar	Change to "by comparison"	
US		5.2	Fig 2	ED	Y axis title unnecessarily long	Change to "intensity of light [%]"	
US	4	5.3.2	1	ED	Throughout text, "backscattered intensity" and "transmitted intensity" are variably either written out or abbreviated.	At first instance of use, define abbreviation, and from there on out use abbreviation and do not spell out these terms.	
US	6	5.3.2	1	ED	"materials" should be singular	Change to "material"	

<sup>1</sup> MB = Member body / NC = National Committee (enter the ISO 3166 two-letter country code, e.g. CN for China; comments from the ISO/ICS editing unit are identified by \*\*)

<sup>2</sup> Type of comment: ge = general te = technical ed = editorial

# Response to affirmative comments

- Though not required, considered by most to be good form
  - Recognizes receipt of comments
  - States status of comments, e.g., will be considered by an editorial group
  - Encourages active participation
  - Closes the loop for those interested in the standard, but have not objected

## TIP: Make it easy on staff – create templates

- Create templates, so only the substance needs to be written after the comments are considered – include, as appropriate:
  1. Confirmation of receipt (Make sure this is timely, even if substantive review will not take place until the next meeting a few months away - explain this)
  2. Next steps, including how to confirm resolved or not
  3. State the consequences of failure to respond
  4. State all applicable deadlines
  5. Appeals notification language (link or excerpt)
  6. Readily available contact for questions
- *Internal: establish repository for all templates*

## 2.6 Consideration of Views and Objections - Tip: Response to Public Comment

- In connection with an objection submitted via public comment:
  - An ASD should add language to the written disposition letter/E-mail sent to a public commenter that states something like
    - This response provides you with an attempted resolution of your comments. **If you wish to remain on record as an unresolved public commenter and thus, have the right to file a procedural appeal, please respond to x by xx/yy/zz and state as much. If I do not hear from you by this date, then your comments will be considered resolved and you will not have the right to a procedural appeal.**
  - This type of language however, is never an option with respect to a properly submitted vote cast by an ANS consensus body member.
    - See section 2.7 for details

# Informal Resolution – Listen...

- Procedural concerns should be addressed in a timely manner:
  - ANSI encourages settlement of disputes at any time if the settlement is consistent with the applicable ANSI procedures
  - If a comment was not properly addressed, take corrective action
  - Address concerns seriously and quickly – don't avoid potential problems, they usually do not go away!
  - Some participants do not understand how standards are developed...help to educate them...avoid unnecessary appeals!

## 2.6 Consideration of Views and Objections - notification of the right to appeal

- If resolution is not achieved, each such objector shall be **informed in writing that an appeals process** exists within procedures used by the standards developer.
  - Procedural appeal regarding the standards development process is to the standards developer first, then to ANSI in the future after a final action has been taken
  - Appeals notice must be in writing
  - Deadline for filing appeal should be clear
  - Procedures for filing appeal should be clear and provided or easily accessible
- Review appeals guidance document for tips



## 2.6 Consideration of Views and Objections - Timely and Late Comments

- The standards developer must follow its procedures, and
  - **may consider** any comments received subsequent to the closing of the public review and comment period (*treat all late comments consistently so the process is fair*); or
  - **shall consider** them in the same manner as a new proposal.
- Timely public comments or votes that are **not related to the proposal** under consideration shall be documented and considered in the same manner as submittal of a new proposal. **The submitter of the comments shall be so notified.**

## 2.6 Consideration of Views and Objections - Unresolved objections reporting

***REMEMBER: tracking unresolved comments and responses is a requirement...and when the BSR reviews the record, they will review comment consideration documentation***

- Each objection resulting from public review or submitted by a member of the consensus body, and which is not resolved (see definition) **must be reported to the ANSI BSR.** (except in the case of Audited Designators)
- Definitions in Annex A of the ANSI Essential Requirements:
  - Resolved: A negative vote cast by a member of the consensus body or a comment submitted as a result of public review where the negative voter agrees to change his/her vote or the negative commenter accepts the proposed resolution of his/her comment.
  - Unresolved: Either (a) a negative vote submitted by a consensus body member or (b) written comments, submitted by a person during public review expressing disagreement with some or all of the proposed standard, that have not been satisfied and/or withdrawn after having been addressed according to the developer's approved procedures.

# QUESTIONS?

## Where can I find ANS and ASD information?

[www.ansi.org](http://www.ansi.org)

[First tab on the left!](http://www.ansi.org)

[www.ansi.org/asd](http://www.ansi.org/asd)

1. List of ANSI-Accredited Standards Developers (ASD) with a scope and contact
2. Lists of **proposed** and **approved** ANS – **including national adoptions (point-in-time)**

[www.ansi.org/StandardsAction](http://www.ansi.org/StandardsAction)

1. Public review announcements, approvals and link to ANS reports

# Upcoming ANS-Related Webinars

All sessions begin at 2pm Eastern – on Thursdays and last 60-120 minutes:

- **July 21, 2022 (Thursday at 2pm Eastern):** ANS Forms

Register in advance for this webinar:

<https://goansi.webex.com/goansi/onstage/g.php?MTID=e57cc2d7de066db098e39f4af18ccd380>

- **July 28, 2022 (Thursday at 2pm Eastern):** Procedural Appeals – ASD and ANSI Appeals Processes

Register in advance for this webinar:

<https://goansi.webex.com/goansi/onstage/g.php?MTID=e5fef6472f59d75dffe176fc57e5910d>

- **September 22, 2022 (Thursday at 2pm Eastern):** *What is an ANS anyway?* (Public, general education session)

Register in advance for this webinar:

<https://goansi.webex.com/goansi/onstage/g.php?MTID=e22faad22382ce20cadd97c1c07107952>

# Thanks for joining us today...

- ✓ Exit survey – 2 quick questions, please complete them:
  - ❖ Was this webinar useful?
  - ❖ How can we improve it?

Hope we'll see you at World Standards Week  
October 10 -14, 2022

<https://www.ansi.org/events/standards-events/world-standards-week>

# American National Standards Institute

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[www.ansi.org](http://www.ansi.org)

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Reference slides...





## 2.5.2 Notification of Standards Development - *Public Review/BSR-8 Form*

✓ *Separate webinar reviews forms and requirements in detail...but here for reference*

- The **comment period** shall be one of the following:
  - A minimum of thirty days if the full text of the revision(s) can be published in *Standards Action*;
    - Up to 5 pages in strikethrough-underline; recommend an intro explaining intent
    - Not for a new ANS
    - Attachments that do not comply will not be published timely unless an ASD responds to PSA requests
  - A minimum of forty-five days if the document is available in an electronic format, deliverable within one day of a request, and the source (e.g., URL or an E-mail address) from which it can be obtained by the public is provided to ANSI for announcement in *Standards Action*; or,
  - A minimum of sixty days, if neither of the aforementioned options is applicable.
- Such listing may be requested at any stage in the development of the proposal, at the option of the standards developer, and may be concurrent with final balloting.
- However, any substantive change subsequently made in a proposed American National Standard requires listing of the change in *Standards Action*.

## 2.5.2 Public Review - References

- Public Review in *Standards Action*
  - <https://www.ansi.org/psawebforms/>
- **Substantive Change:** A substantive change in a proposed American National Standard is one that directly and materially affects the use of the standard. Examples of substantive changes are below:
  - “Shall” to “should” or “should” to “shall”;
  - Addition, deletion or revision of requirements, regardless of the number of changes;
  - Addition of mandatory compliance with referenced standards.