

Proposed Procedural Revisions for Public Comment Public Comments due November 15, 2023

Four sets of proposed procedural revisions are available for public comment:

1. **ExSC_037_2023:** Proposed revisions to the *ANSI International Procedures* (www.ansi.org/internationalprocedures). These proposed revisions address the scenario in which the U.S. holds the ISO or IEC Secretariat and may decide to recommend a Chair from another country.
2. **ExSC_062_2023:** Proposed revisions to the *ANSI Essential Requirements* (www.ansi.org/essentialrequirements) to clarify that English is the language of the American National Standards (ANS) process and all approval and oversight decisions are based on English-language documentation.
3. **ExSC_063_2023:** Proposed revisions to the *ANSI Procedures for the National Adoption of ISO or IEC Standards as American National Standards* (www.ansi.org/nationaladoption). These proposed revisions clarify existing procedures to reflect current policies and rules that apply to the national adoptions of ISO and IEC standards as American National Standards.
4. **ExSC_064_2023:** Proposed revisions to clarify existing requirements in sections 2.6 Consideration of views and objections and 4.2 Approval actions in connection with American National Standards of the *ANSI Essential Requirements* (www.ansi.org/essentialrequirements).

Instructions for Submitting Public Review Comments

Public review comments are invited on the revisions shown in strikethrough-and-underline text. Public comments will be made available to the public, with attribution, in the ANSI Public Library within a reasonable time of the close of the public comment deadline. The ANSI Executive Standards Council (ExSC) will consider all timely and relevant public comments and provide a written response to commenters after the ExSC's February 2024 meeting.

When submitting public comments, please suggest alternative text, as appropriate. Public comments are to be submitted to psa@ansi.org. The deadline for filing public comments is **November 15, 2023**.

Thank you.

Proposed revisions to the *ANSI International Procedures* (www.ansi.org/internationalprocedures)

Proposed Revision 1: 1.6 U.S. Individuals Serving as ISO Chair

The ISO Directives grant authority to the committee secretariats (TC or SC) to nominate the Chair. ANSI delegates this authority to the ANSI-delegated secretariat organization noting that, pursuant to the *ANSI International Procedures*, it is a U.S. TAG function to recommend to ANSI U.S. candidates for the Chair of ISO committees. In cases where a U.S. individual is nominated to be Chair where ANSI does not hold the Secretariat, the corresponding U.S. TAG will be consulted. If there is no U.S. TAG, ANSI will be consulted for approval.

U.S. individuals serving in this role must complete mandatory leadership training offered by ANSI and are also expected to participate as a member of the corresponding U.S. TAG, if applicable.

Note: If an ANSI-delegated secretariat nominates a non-US chair, the corresponding ANSI-Accredited U.S. TAG will be consulted and the National Standards Body (NSB), which the non-U.S. chair represents, shall confirm the nomination.

Proposed Revision 2: Code of Conduct

B5.1 Written Procedures. Written procedures shall govern the methods used for the development of U.S. positions and shall be available to any interested party.

A TAG Administrator ~~may~~ shall require members and observers to agree to comply with a Code of Conduct, consistent with the ANSI International Procedures.

Annex C provides a sample Code of Conduct.

Annex C: Model Code of Conduct for Participation on an ANSI-Accredited U.S. TAG

This model Code of Conduct¹ may be adopted as is or adapted as part of a TAG Membership application or other document. A TAG Administrator ~~may~~ shall require TAG members to ~~sign~~ agree to comply with ~~of~~ this Code (or comparable document, consistent with the ANSI International Procedures) as a condition of participation. It is recommended that this Code be published and distributed annually along with a copy of the TAG's accredited procedures, links to the ISO/IEC Directives and contact information for the individual(s) serving as TAG Administrator.

¹ See *ANSI Code of Conduct* (<https://www.ansi.org/resource-center/code-conduct>) and *ISO Code of Conduct for the technical work* (<https://www.iso.org/publication/PUB100397.html>).

Proposed revisions to the *ANSI Essential Requirements* (www.ansi.org/essentialrequirements)

4.0 Normative American National Standards Administrative Procedures

This section articulates the administrative and processing requirements associated with the American National Standards process.

The official language of the American National Standards (ANS) process, including all decisions made by ANS Program Oversight Committees, is English. The only version of a standards developer's procedures that are accredited by ANSI, and the only version of a document approved by the American National Standards Institute (ANSI) as an American National Standard (ANS)¹, is the English language version.

4.1 Accreditation of American National Standards Developers

...

4.2 Approval of actions in connection with American National Standards

...

4.3 Planning, coordination and public notice

...

4.4 Designation of American National Standards

...

4.5 Publication of American National Standards (ANS)

American National Standards shall be published in English and made available as soon as possible, but no later than six months after approval as an American National Standard. ~~The standards developer shall publish the standard or shall grant the right of publication to ANSI. The ANS mark and the words "an American National Standard" may appear on the English-language version of an ANS only and not on a translation of an ANS.~~

If an American National Standard is not published within six months following its approval, the standards developer may request an extension of this deadline from the BSR or its designee. Such a request shall be in writing, shall supply the reason for the delay, and shall indicate a firm final date for publication. At its discretion, the BSR or its designee may grant an additional period of time for publication. Audited Designators are not required to request an extension, but shall ensure an equivalent publication schedule and maintain documentation related to any publication delays.

The BSR or its designee ~~shall~~ may publish a notice in *Standards Action* of intent to withdraw approval if the standards developer a) fails to publish the standard ~~or fails to grant ANSI the right to publish~~ within six months after its approval as an American National Standard and does not request an extension of the deadline despite follow-up or b) fails to meet the extended deadline.

¹ An ANS that is an identical national adoption of an ISO or IEC standard which has been translated officially by ISO or IEC may carry the ANS mark. A modified national adoption may not.



ExSC_063_2023
October 6, 2023 Standards Action

ANSI Procedures for the National Adoption of ISO and IEC Standards as American National Standards

2023: See proposed revisions to sections 1.0, 4.0 and Annex B

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ANSI Procedures for the National Adoption of ISO and IEC Standards as American National Standards

1.0 General

ANSI accredited standards developers (developers) should take ISO or IEC standards into consideration and should, if appropriate, base their standards on or consider the adoption of an ISO or IEC standard as an American National Standard (ANS). US TAGs exist for most standards projects for which the United States has evidenced substantial interest. These groups may be contacted for information and advice through their TAG Administrators or Technical Advisors (as relevant), who are on record at ANSI.

The *ANSI Policy Regarding Rights to Nationally Adopt IEC and ISO Standards or Otherwise Use IEC and ISO Material* shall be consulted for the terms and conditions concerning which ANSI accredited standards developers may adopt an ISO or IEC standard as an American National Standard¹. *ISO/IEC Guide 21* defines certain levels of equivalencies of adoption,² i.e., identical, modified or not equivalent. Only an identical or modified version of the ISO or IEC document shall be considered for adoption as an American National Standard. A developer who chooses to nationally adopt an ISO or IEC standard shall follow its accredited procedures for developing American National Standards. A developer who wishes to have the option of following the expedited procedures set forth in clause 3.0 herein when seeking to adopt an ISO or IEC standard as an identical adoption shall include a provision or notification to this effect in its accredited procedures.

If a developer wishes to adopt an ISO or IEC guide, report, or document other than a standard, the developer shall follow its accredited procedures and may not utilize the expedited procedures detailed in clause 3.0 below.

2.0 Requirements Associated with the Identical or Modified Adoption of an ISO or IEC Standard as an American National Standard

A standards developer wishing to adopt an ISO or IEC standard as an American National Standard that constitutes an identical or modified adoption as defined in Annex A shall:

- a) clearly identify during the ANS development and submittal process that it is the intent of the standards project to adopt a specific ISO or IEC standard and provide notice in compliance with current ANSI requirements, as modified by clause 3.0;
- b) designate and publish the final approved American National Standard in compliance with applicable ANSI procedures; and
- c) comply with the *ANSI Policy Regarding Rights to Nationally Adopt IEC and ISO Standards or Otherwise Use IEC and ISO Material* and submit evidence of compliance (such as a confirmation from the ANSI staff responsible for such contractual arrangements) as part of the formal submittal of the candidate American National Standard for approval.

3.0 Expedited Procedures for the Identical Adoption of an ISO or IEC standard as an American National Standard

The expedited procedures contained in this clause may be used only for the identical adoption of ISO or IEC standards for which the US TAG voted or will vote in the affirmative and for which no claims of conflict or duplication with an existing American National Standard have been made. For all other circumstances, the developer's accredited procedures shall apply.

A developer who wishes to have the option of following the expedited procedures set forth herein when seeking to adopt an ISO or IEC standard as an identical adoption shall include a provision or notification to this effect in its accredited procedures. In addition, the numerical requirements for consensus set forth in the developer's

¹ Decisions made by TAG Administrators under the *ANSI Policy Regarding Rights to Nationally Adopt IEC and ISO Standards or Otherwise Use IEC and ISO Material* are final and not subject to appeal at ANSI through its Program Oversight Committees or otherwise.

² See Annex A for definitions of the degrees of adoptions.

accredited procedures apply.

A developer may propose the identical national adoption of an ISO or IEC standard to its American National Standard consensus body. The developer that is proposing such an action may do so:

- a) Concurrent with the US TAG vote on an ISO or IEC standard. In this case the developer's consensus body has an opportunity to endorse the ISO or IEC standard for adoption as an American National Standard at or around the same time that the US TAG is approving the standard as an ISO or IEC standard.

Or

- b) Any time after an ISO or IEC standard has been approved as such.

The following provisions are applicable to the processes associated with the national adoption of identical ISO or IEC standards:

3.1 Public notice and public review

When a developer is proposing an identical national adoption of an ISO or IEC standard, the following options apply:

- a) Project Initiation Notice (PINS): The PINS provisions set-forth in the *ANSI Essential Requirements* apply. If a claim of conflict or duplication with an existing American National Standard is made, the developer shall follow its accredited procedures and shall not utilize these expedited procedures.
- b) Public Review: The public review announcement in *Standards Action* shall clearly indicate that the action pending is an identical adoption of an ISO or IEC standard. Whenever possible, public review of the proposed identical adoption should occur before or concurrent with balloting by the consensus body. With respect to international approval, the SDO undertaking national adoption shall provide all public review comments to the US TAG for consideration, but is not required to inform the commenters of how the TAG disposed of those comments. With respect to the national adoption, all comments received shall be provided to the consensus body (if other than the TAG) for consideration in determining its position. The consensus body is not required to provide detailed responses to the comments unless a claim of conflict or duplication with an existing American National Standard is made. In that case, the developer shall follow its accredited procedures and shall not utilize these expedited procedures. In any event, the SDO shall inform public reviewers whether or not the identical adoption was approved for submission to ANSI.

3.2 Minimum consensus body ballot period

A developer using these expedited procedures may utilize the minimum ballot period established by their accredited procedures for American National Standards. Alternatively, the consensus body may vote to establish a ballot period that is not less than two weeks.

3.3 Comment

The developer shall clearly indicate to the consensus body that the ballot associated with the national adoption of an ISO or IEC standard only takes into consideration the identical adoption of the standard as an American National Standard. Thus, there is no opportunity for comment resolution unless a claim of conflict or duplication with an existing American National Standard is made. In that case, the developer shall follow its accredited procedures and shall not utilize these expedited procedures. Any comments shall be provided to the members of the consensus body in order to provide them with the opportunity to respond, reaffirm, or change their vote within the time limits established by the developer's accredited procedures; however, there shall be no attempt at resolution of the comments unless identical adoption under ANSI expedited procedures is abandoned and the consensus body decides to instead consider adoption (with or without national deviations) under its accredited procedures.

Comments received from either the consensus ballot or the public review period shall also be referred to the appropriate US TAG.

3.4 Notice of Action and Right to Appeal

Prior to the submittal to ANSI of a candidate American National Standard as an identical adoption following these expedited procedures, the developer shall notify consensus body members and public commenters in writing of the intended final action on the standard and if there are unresolved objections, that an appeals

process exists within the accredited procedures used by the standards developer.

3.5 Approval of an ISO or IEC Standard as an American National Standard

A candidate American National Standard that is submitted as a result of the implementation of these expedited procedures shall be processed in the same manner as a standard that is submitted without objections. However, the right to appeal its approval as an ANS to ANSI is available.

4.0 Periodic Review

An ANS that is an identical adoption of an ISO or IEC standard does not have to be reaffirmed according to the schedule applicable to other American National Standards, but rather may be reaffirmed at the same time that the corresponding ISO or IEC standard is reaffirmed by the respective organization, or within six months of such action.

If the ISO or IEC standard has been withdrawn, revised or superceded, similar action shall be considered by the adopting ~~ANSI-Accredited Standards Developer (ASD)~~SDO within six months of the international action.

If the ISO or IEC standard that was nationally adopted as an ANS is withdrawn or superseded by ISO or IEC, then it shall be withdrawn as a current national adoption by the ASD within six months of the international action. ~~If the withdrawn national adoption such a document is to be made available for historical reference and/or purchase, the ASD must have a contract in place for this purpose.~~

If the standards developer no longer has the national adoption rights under the *ANSI Policy Regarding Rights to Nationally Adopt IEC and ISO Standards or Otherwise Use IEC and ISO Material* with regard to the ISO or IEC standard, then the related ANS shall be withdrawn by the ASD.

If the withdrawn national adoption is to be made available for historical reference and/or purchase, the ASD must have a contract with ANSI in place for this purpose.

Annex A: Definitions of Levels of Equivalency of National Adoptions of ISO or IEC Standards

Normative, as applicable

The definitions contained in this annex are excerpted from *ISO/IEC Guide 21 – Adoption of ISO or IEC Standards as regional or national standards*. This annex is normative in connection with actions related to the national adoption of ISO or IEC standards. Any changes in document layout (e.g., in relation to pagination, font type and font size etc.) especially in an electronic environment, have no impact on the degree of equivalence.

A.1 Identical (IDT)

The regional or national standard is identical to the ISO or IEC standard under the following conditions:

- a) the regional or national standard is identical in technical content, structure and wording (or is an identical translation), or
- b) the regional or national standard is identical in technical content, although it may contain the following minimal editorial changes:
 - substitution of decimal point for a decimal comma;
 - correction of any misprints (e.g., spelling errors) or pagination changes;
 - deletion of text in one or several languages from a multilingual ISO or IEC standard;
 - inclusion of any technical corrigenda or amendments issued to the ISO or IEC standard;
 - changes to the title to be consistent with an existing regional or national series;
 - substitution of “this regional/national standard” for “this ISO or IEC Standard”;
 - inclusion of any regional or national informative material (e.g., informative annexes that do not alter, add to or delete from the provisions of the ISO or IEC standard); examples of informative material are advice to users, training guidance or suggested forms or reports;
 - deletion of informative preliminary material from the ISO or IEC standard;
 - changes in wording, i.e., use of synonyms to reflect common language use in the region or country adopting the ISO or IEC standard, such as the use of “elevators” for “lifts” in certain countries;
 - addition, for informative purposes, of recalculated values of quantity units where a different measurement system is used in an adopting country.

The “vice versa principle” is fulfilled.³

A.2 Modified (MOD)

The regional or national standard is modified in relation to the ISO or IEC standard under the following conditions. Technical deviations are permitted provided they are clearly identified and explained. The regional or national standard reflects the structure of the ISO or IEC Standard. Changes to the structure are only permitted if an easy comparison of the content and structure of the two standards continues to be possible.

For transparency and traceability, it is strongly recommended that a national standard adopts only one single ISO or IEC standard. Under certain circumstances, it may be appropriate to adopt several ISO or IEC standards within one national standard. However, this is only practicable for the user if an easy comparison of the content is provided in a list identifying and explaining the changes. Modified standards may also include the changes permitted under identical correspondence.

The “vice versa principle” is not fulfilled.

A modified standard can include such cases as the following:

- a) “The regional or national standard contains less.” The regional or national standard only applies a subset of the available choices in the ISO or IEC Standard, has less stringent requirements, etc.

³ Vice versa principle: principle whereby anything that is acceptable under the terms of the ISO or IEC Standard is acceptable under the regional or national standard and vice versa, and thus compliance with the ISO or IEC Standard also means compliance with the regional or national standard.

- b) “The regional or national standard contains more.” The regional or national standard adds aspects or types, has more stringent requirements, includes additional tests, etc.
- c) “The regional or national standard alters a part of the ISO or IEC Standard.” Part of the content is identical, but both the regional or national standard and the ISO or IEC Standard contain some differing requirements.
- d) “The regional or national standard provides an alternative choice.” The regional or national standard provides a provision of equal status, which may be used as an alternative to that given in the ISO or IEC Standard.

(Note: See Annex A of the *ISO Guide* for examples of lists of technical deviations and their explanation.)

A regional or national standard can include an ISO or IEC Standard in its totality and can contain additional technical provisions, which are not part of the ISO or IEC Standard. In this case, the degree of correspondence to the ISO or IEC Standard is either “modified” or “not equivalent”, depending on whether or not the differences are clearly indicated and technical deviations are listed and explained, although the part composed of the included ISO or IEC Standard may not have been subject to any modifications.

A.3 Not Equivalent (NEQ)

The regional or national standard is not equivalent to the ISO or IEC Standard in technical content and structure and the changes have not been clearly identified. This also can include the case where only a minority in number or significance of the ISO or IEC provisions remains in the regional or national standard. This degree of correspondence does not constitute an adoption.

Annex B: Designation, Maintenance, and Publication of a National Adoption of an ISO or IEC Standard

Normative, as applicable

B.1 Designation and Publication

This section addresses methods for informing users that a standard is a national adoption of an ISO or IEC Standard and provides recommendations associated with numbering identical adoptions. Much of the text in this annex is excerpted from *ISO/IEC Guide 21 – Adoption of ISO or IEC Standards as regional or national standards*.

Note that if changes are made to an ISO or IEC standard during the course of the development of consensus for its approval as an American National Standard and those changes are not reflected in the final ISO or IEC version of the standard, the resulting standard shall not bear the ISO or IEC standard designation. In such case, the standard will be considered a national/harmonized standard and is not an identical adoption. It shall be processed in accordance with the developer's procedures once the appropriate copyright permission is received from ANSI for use of the ISO or IEC material.

B.2 Methods of adoption notice ⁴(or Public Notification of the National Adoption of an ISO or IEC Standard as an American National Standard)

The adoption of an ISO or IEC standard shall ensure that the identification of the ISO or IEC standard is clearly stated. ~~There are two methods for the adoption of ISO or IEC Standards:~~

~~Endorsement method: only applicable to identical adoptions. Upon approval as an American National Standard an announcement in *Standards Action* shall be made. The standard adopted shall reference the ISO or IEC designation.~~

~~Republication: there are three methods of republication: reprinting, translation (with or without reprint of the original), and redrafting. Independent of which method of republication is chosen, a regional or national identifier of the organization adopting the ISO or IEC standard shall appear on the cover page and all other pages of the regional or national standard. In addition, the degree of correspondence to the ISO or IEC standard shall be stated in a prominent position and shall include the ISO or IEC reference number and year, and international title if different from the national title. (Examples: titles the same – Identical to ISO 11111: 2000; title different – Modified adoption of ISO 11111: 2000, Widgets.)~~

~~With particular reference to the development of electronic versions of standards, standards bodies may find new methods of adoption which are not covered in the *ISO/IEC Guide 21*, or may combine the existing ones. In this case the method used will not be listed here. However, the recommendations regarding choice and indication of correspondence will still remain applicable.~~

For further information concerning adoption methods described above and for methods of indicating technical deviations and editorial changes, please consult *ISO/IEC Guide 21*.

B.3 Designating national standards that are identical or modified adoptions of ISO or IEC Standards

These guidelines supplement applicable sections of the *ANSI Essential Requirements*.

B.3.1 Designating national standards that are identical adoptions of ISO or IEC Standards

When a national standard is identical to an ISO or IEC standard, this should be evident to the reader immediately on the cover and title page. The recommended method of identification for identical adoptions consists of including the ISO or IEC standard reference number (letters and number) in combination with or in association with the national designation. Depending on the method chosen, in order to improve transparency, the year of publication of the ISO or IEC Standard and/or that of the national standard should be added to the number

⁴ See current version of ISO/IEC Guide 21.

wherever possible. Examples of acceptable methods of numbering follow:

a) Single-line numbering: The national letters may be separated from the ISO or IEC reference number (letters and number) by a space:

ANSI ISO 1234:1999

b) Two-line dual numbering: The national letters followed by the ISO or IEC reference number on a separate line or on one line using a slash to separate them:

ANSI ABC 331:1999

ISO 1234:1998

or

ANSI ABC 331:1999/ISO 1234:1998

B.3.2 Designating national standards that are modified adoptions of ISO or IEC Standards

When a national standard is a modified version of an ISO or IEC standard, ISO or IEC should not be part of the alpha-numeric designation. The abbreviation for the degree of correspondence should appear after the regional or national standard title and the reference number of the International Standard, including its date. For modified adoptions, only a regional or national reference number is permitted; that is, neither of the alternatives given in B.3.1 a) or b) is permitted.

An example of an acceptable designation of a modified national adoption follows, where XYZ is the ASD's acronym:

- XYZ 2345:1993, Current transformers (IEC 60185:1987, MOD)

B.4 Maintenance of national adoptions

When adopting an ISO or IEC standard, all existing amendments and technical corrigenda to the ISO or IEC standard shall be included in the national standard. Amendments and technical corrigenda published after the adoption of an ISO or IEC standard should be considered for adoption as soon as possible. Adoption of amendments shall follow the same procedure as for the adoption of the original standard. Technical corrigenda (i.e., errata) may be published following the standards developer's usual procedures.

Proposed clarifications to the ANSI Essential Requirements (www.ansi.org/essentialrequirements)

2.6 Consideration of views and objections

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*.

In connection with an objection articulated during a public comment period, or submitted with a negative 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. 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. In addition, except in the case of Audited Designators, 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.

When this process is completed in accordance with the written procedures of the standards developer, the standards developer may consider any comments received subsequent to the closing of the public review and comment period, or shall consider them in the same manner as a new proposal. Timely comments 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.

Each unresolved objection and attempt at resolution, and any substantive change¹ made in a proposed American National Standard shall be reported to the consensus body in order to afford all members of the consensus body an opportunity to respond, reaffirm, or change their vote.

4.2 Approval of actions in connection with American National Standards

A standard developed by an ANSI-Accredited Standards Developer may be approved as an American National Standard by the ANSI Board of Standards Review (BSR) or by an ANSI Audited Designator. In either case, the essential due process and consensus criteria defined herein shall apply. In addition, approval assures the user that each American National Standard is generally acceptable to those that participated in the development of consensus for the standard.

Evidence of procedural compliance in support of the approval of a proposed new American National Standard or a proposed revision or reaffirmation of an American National Standard to be approved by the BSR shall be included in the BSR-9 submittal. The BSR-9 submittal shall be provided submitted to the secretary of the BSR within one (1) year from the close of the comment period listed in *Standards Action* using the appropriate form provided by ANSI, unless the standards developer notifies the secretary of the BSR in writing of good cause for a different schedule for submittal. Failure to make the submittal within two (2) years from the close of the comment period listed in *Standards Action* shall require consideration by the BSR, i.e., withdrawal, extension for cause, or another listing in *Standards Action*. ANSI-Accredited Standards Developers that have been granted the status of ANSI Audited Designator shall take action in connection with candidate American National Standards in a timeframe that is consistent with that specified for all other ANSI-Accredited Standards Developers.

4.2.1 Approval by the ANSI Board of Standards Review

Approval, withdrawal, revision or reaffirmation of an American National Standard is based on the evidence

¹ Any substantive change made in a proposed American National Standard shall also be listed for public comment in accordance with 2.5.2 Public Review.

submitted that the requirements set forth herein have been met.

The ANSI Board of Standards Review (BSR) shall review ~~standards~~ BSR-9 submittals with unresolved objections on record. This includes negative consensus body votes as well as public review comments. Standards submitted without objections and identical national adoptions processed in accordance with the expedited procedures contained in the *ANSI Procedures for the National Adoption of ISO and IEC Standards as American National Standards* may be administratively approved by the BSR. The BSR does not have jurisdiction over the standards of ANSI Audited Designators unless an ANSI Audited Designator chooses to submit one or more standards to the BSR for approval.