FROM THE DESK OF BILL WEAVER
ACCT DIRECTOR OF OPERATIONS

Date: **July 25, 2016**
To: **PSA@ANSI.org via Email**
From: **Bill Weaver, Association for Challenge Course Technology (ACCT)**
RE: ***Standards Action* Notice, SAV4724, June 10, 2016, on Proposed Changes to the Operating Procedures of the ANSI Appeals Board, ANSI Board of Standards Review, and ANSI Executive Standards Council.**

In the Referenced *Standards Action* Notice, ANSI advised that:

> Comments with regard to these proposed revisions should be submitted to psa@ansi.org by July 25, 2016. Please be specific in your comments and, where possible, propose alternative language along with a brief explanation.
>
> The ANSI Executive Standards Council (ExSC) will consider all public comments received by the comment deadline at its next regularly scheduled meeting in September 2016. Shortly thereafter, all commenters will be provided with a written disposition of their respective comments.
>
> Public comments received in connection with these proposed revisions will be made available to the public in the ANSI Online public library one week after the close of the comment deadline.

Document **ExSC_053_2016** advised:

> The proposed revisions that follow are intended to clarify and refine ANSI's appeals processes concerning appeals to the ANSI Appeals Board (the final level of appeal at ANSI), the ANSI Executive Standards Council (ExSC) and the ANSI Board of Standards Review (BSR). A version of these revisions shown in strikethrough and underline format follows the version immediately below.

Introduction

Founded in 1993, **The Association for Challenge Course Technology (ACCT)** is the world's leading and largest American National Standards Institute (ANSI) Accredited Standards Developer (ASD) focused specifically and solely on the challenge course industry. ACCT is comprised of a nucleus of more than 3097 members worldwide (including the United States, Europe, Asia, the Caribbean, Canada, Japan, Korea and Central America) and continues to develop a global alliance of like-minded organizations.

ACCT Mission Statement

The Association for Challenge Course Technology (ACCT) establishes and promotes the standard of care and measure of excellence that defines professional practice and effective challenge course programs. ACCT develops, refines, and publishes standards for Installing, maintaining, and managing challenge courses; provides forums for education and professional development; and advocates for the challenge course and adventure industry.

Phone 800-991-0286 ext. 913 • Fax 800-991-0287 • bill@accinfo.org • www.acctinfo.org

ACCT was accredited by ANSI on 7/7/2006. The ACCT has been developing standards for the challenge course industry since 1994. Between 1994 and 2012, the ACCT published eight editions of the ACCT Standards. The ANSI/ACCT 03-2016 Challenge Course and Canopy/Zip Line Tour Standard received final approval January 11, 2016 from the ANSI Board of Standards Review. It is now an approved American National Standard (ANS), thus discontinuing the publication nomenclature of the 1st through 8th editions.

ACCT has had experience with the ANSI Appeals Process, having participated in Appeals before the ANSI ExSC and the BSR and has an Appeal currently pending before the BSR. ACCT has also been involved in Appeals at the SDO level with other ASDs as well as conducting Appeals at ACCT. Thus, ACCT has an interest in the changes being proposed by the ExSC to each of the ANSI Program Oversight Committees (POC) Operating Procedures.

In order to ensure that it understood and followed the ANSI Procedures and the *ANSI Essential Requirements*, as an ASD, and had a compliant and credible ANSI development process over the last several years ACCT has retained the services of three knowledgeable ANSI Advisors or Consultants. One, George Willingmyre of GTW Associates, was an ANSI Vice President for many years and responsible for its DC Office and Conformity Assessment activities. As a voting member of the ANSI National Policy Committee (NPC) he is part of the approval process for revisions to the ANSI ER. James Converse, a former member and former Chair of the ANSI Executive Standards Council (ExSC); former Chair of INCITS (previously X3); and prior Director of Standards, Eastman Kodak; Director of ASTM; and Manager of Standards Activity for ISA; and Technical Director for ABMA (ASC B3); counseled ACCT on its Procedures and revisions to its Procedures, and assisted in the Responses to Public Comments, BSR submittals, and Appeals at the ASD level. Dan Bart, the President and CEO of Valley View Corporation, an attorney, brought his expertise to the ACCT ANSI team as one who managed an ASD – the Telecommunications Industry Association or "TIA" □□ which at the time was the 4th largest ASD measured by the number of published ANSs. Mr. Bart had staff at TIA that reported to him that served on the ExSC so he is familiar with ExSC operations and responsibilities. From 1995 to 1997 Mr. Bart not only directed the Standards and Technology Department of TIA but also the same Department at the Electronic Industries Alliance (EIA) and the combined ANSs of EIA and TIA would have ranked number two at ANSI, only surpassed by ASTM. Mr. Bart, currently the Vice Chair of the Company Member Forum, has been on the ANSI Board over twenty years, and has served in many ANSI leadership positions. He was an ANSI Auditor for four years. He has been on the ANSI Appeals Board since 2010. He has been involved in Appeals at TIA, other ASDs, and before the BSR, ExSC, and of course the Appeals Board. He counsels many SDOs on ANSI Procedures and the Appeals Process at the SDO level and the ANSI level. As a voting member of the ANSI NPC he is part of the approval process for revisions to the ANSI ER.

ACCT Comments on ExSC_053_2016

ACCT has been provided a copy of the extensive comments drafted by Valley View Corporation (VVC) and ACCT's Consultant, Dan Bart, responding to **ExSC_053_2016** and fully supports each of the points raised in those VVC Comments. Of note, ACCT's current Appeal before the

BSR is one of the examples cited in those Comments where had the ExSC proposed page limits and double-spacing requirements been in effect now, the BSR Appeal and Response filed in that matter would not have met those requirements. There should be no arbitrary ANSI-imposed specifications on the page counts or format and spacing of pleadings to cover very complex Appeals matters. In that proceeding, the Appellant filed a 27 page, single-spaced Appeals Statement (which if double-spaced would have exceeded the proposed 30 page cutoff rule), and had 250 attachments. To respond to something with that much documentation, the ACCT Response also, of necessity, had to be very voluminous itself.

Conclusion

ACCT would like to be on record in this proceeding as supporting each of the VVC comments and adopting them as though they had been Incorporated by Reference (IBR) in these ACCT Comments.

Respectfully submitted,

Bill Weaver

The Association for Challenge Course Technology (ACCT)

By: Bill Weaver, ACCT
Director of Operations