GTW ASSOCIATES

Date: July 25, 2016

To: PSA@ANSI.org via Email

ExSC_053E_2016

From: George T. Willingmyre, President GTW Associates

RE: *Standards Action* 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.

GTW Recommendation to prepare a short statement of rationale for each proposed change

The Referenced *Standards Action* Notice states:

> *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.*

Note the obligation above in the first sentence on proposed commenters to provide a brief explanation of the comment.

There is a statement in an ANSI email to members, "The proposed revisions are intended to clarify and refine these ANSI appeals procedures." However this statement is at too generic a level to have much value in a review of the specific changes to the procedures.

It would be helpful in reviewing proposed changes and commenting on the merits of the proposed changes to understand the rationale for each proposed change. It could be that as stated above the authors believed that a proposed change would clarify or refine what the procedures were intended to achieve (But there is no discussion of any problems about misunderstanding what the procedures were intended to achieve) Or it could be that a proposed change would promote greater efficiency in ANSI managing the process. Or it could be that the authors believed that a proposed change would "fix" some other problem that ANSI has experienced in managing the process. Or it could be some other reason. Providing a short statement why every proposed change is being made would greatly facilitate understanding what the proposed changes are supposed to achieve by reviewers of the proposed changes and would also be very helpful to future committees and persons who may have the assignment to propose other potential revisions or to revise the finally approved changes perhaps because the changes did not meet the original rationale for the procedures or changes or perhaps because the "problem" to be solved changed its nature or did not go away. I recommend that each change ultimately made have (likely in a separate rationale document) an accompanying short statement what the change is supposed to achieve. It could be similarly helpful to have available a statement about other important changes considered but not implemented why the change is not being made.

GTW Associates
1012 Parrs Ridge Drive
Spencerville, MD 20868
phone 301-421-4138
facsimile 301-421-0977
gtw@gtwassociates.com
http://www.gtwassociates.com