

From: Kristy Mastromichalis <kmastromichalis@cganet.com>
Sent: Wednesday, January 12, 2022 5:08 PM
To: PSA Department <PSA@ansi.org>
Cc: Kristy Mastromichalis <kmastromichalis@cganet.com>
Subject: [EXTERNAL] Comments on the Proposed Revisions to the Current (2019) ANSI International Procedures

Good afternoon:

Thank you for the opportunity to submit these comments on the proposed revisions to the current (2019) *ANSI International Procedures*. The majority of these suggested changes are editorial in nature to help ensure consistency and accuracy throughout the procedures. If you have any questions, please do not hesitate to contact me.

- 1) General comment: consider defining/explaining what is meant by “secretariat”. Given the number of times this word is used in the document, a definition would be helpful. For an example, see *My ISO job: what delegates and experts need to know*: “Each ISO technical committee, project committee or subcommittee is administratively supported by an ISO member body (the “secretariat”). The member body which is appointed by the Technical Management Board to hold the secretariat of a committee is also by default a participating member (P-member) in the committee. The member body which holds the secretariat of a committee appoints a Secretary, the person responsible for all administrative aspects of the committee. The Secretary is however required to be neutral and to dissociate him/herself from his/her national positions. S/he works closely with the committee Chair in managing the work of the committee.”

RESPONSE: Agreed. This will be added to the end of 1.5.1: The role of an ISO secretariat is to provide administrative and procedural support to the technical committee or subcommittee to which it is appointed, in accordance with ISO’s and ANSI’s rules and procedures.

- 2) Change: In lines 14, 630, and 1185, change “assure” to “ensure”.

Reason: accuracy - Assure means to promise or say with confidence to remove someone’s doubts. Ensure means to make certain that something happens – to guarantee it. In the context of these procedures, ensure is the correct word.

RESPONSE: Based on other public comments, lines 14-15 will be revised to read:

A mechanism for development and coordination must exist to assure that positions developed by ANSI-Accredited U.S. TAGs to ISO are representative of U.S. interests before presentation to ISO.

Note: Webster’s dictionary defines “assure” as “to make sure or certain”. A final review of usage will be undertaken as part of the editing process.

- 3) Change: In line 62, delete “shall” and add an “s” to provide and propose to read: “IPAG provides views and proposes policies...”
Reason: Consistency - all of the other definitions were revised to remove the word “shall”.

RESPONSE: Accept.

- 4) Change: in line 93, delete “shall” and replace with “is”; The responsibility for the USNC is exclusively...”
Reason: Consistency - all of the other definitions were revised to remove the word “shall”.

RESPONSE: Accept. Delete “shall be” and replace with “is”.

- 5) Change: In line 418, delete “Executive Standards Council” and the parentheses around ExSC to read: “The ExSC shall approve...”
Reason: This acronym has already been spelled out with parentheticals earlier in the procedures.

RESPONSE: Thank you but disagree; retain to facilitate understanding. Many are not familiar with the term “ExSC” and many do not read the ANSI International Procedures in their entirety, but rather look at particular sections of the document.

- 6) Change: In note 5 on page 13, use the acronym for accredited standards developers (ASD) instead of spelling it out. Also delete “American National Standard” and just use ANS.
Reason: Both of these acronyms have already been spelled out with parentheticals earlier in the procedures.

RESPONSE: Thank you but disagree; retain to facilitate understanding.

Add “ASD” after the words “ANSI-Accredited Standards Developer”. Many are not familiar with the term “ASD” and many do not read the ANSI International Procedures in their entirety, but rather look at particular sections of the document.

- 7) Change: In line 458, for the term “normally looks to”, consider changing to: “relies on” or “expects” or something similar.
Reason: This idiom seems to be too colloquial for these procedures.

RESPONSE: Thank you but disagree. The current language reflects current practice and makes sense in the context in which it is presented.

- 8) Change: Lines 1133, 1134, and 1135 contain similar text as lines 1113 and 1114. Suggest moving paragraph from lines 1133-1135 to replace current text in 1113 and 1114 as follows: “Panel members and all parties shall receive copies of the appeals record at least fifteen (15) calendar days prior to the date of the appeals hearing. The name and affiliation of all speakers and any observers, if allowed, shall be provided to the TAG Administrator in advance of the hearing by a date certain.”
Reason: To avoid duplication and/or inconsistency. Also the information in lines 1133-1135 is more relevant to “Hearing” (things that should happen before the hearing) as opposed to “Conduct of the Hearing” (things that should happen during the hearing).

RESPONSE: These will be taken into consideration during final editing.

- 9) Change: In line 1149, add (30) after “thirty” to read “thirty (30) calendar days”
Reason: Consistency - where other numbers appear in the procedures, they are spelled out and then the numbers are included in parentheses.

RESPONSE: Accept.

- 10) Change: In lines 1187 and 1188, change “document” to “annex”
Reason: Consistency - this is referred to as an Annex in the note

RESPONSE: Accept.

- 11) Change: Throughout Annex B, there are acronyms (e.g., PSDO, ANS, ASD) that have already been used previously in the procedures but are still spelled out in this Annex. Update the Annex to use just the acronym.

Reason: Consistency - these acronyms have already been spelled out with parentheticals earlier in the procedures.

RESPONSE: This recommendation will be reviewed during final editing. In some cases, it is useful to repeat the term and the acronym.

12) Comment: Under B4.2 Balance, it states “Unless it is claimed by a U.S. National Interested Party (organization, company, government agency, individual, etc.) that a single interest category dominated the development of the U.S. position, no test for dominance is required.” ANSI should provide guidance on what a test for dominance could look like, if/when there is a claim of dominance. If there is a reference to ANSI issued (or ISO issued) guidance, please add that here.

RESPONSE: A guidance document on lack of dominance within the ANS process exists. You may wish to propose to the ExSC that it consider its use in this context, but at this time reference to an ANS-related guidance document will not be added to the ANSI International Procedures. Creation of a new guidance document is not within the scope of this TG.

Thank you,
Kristy L. Mastromichalis (she, her, hers)
Committee Project Manager
Compressed Gas Association, Inc.
Email: kmastromichalis@cqanet.com