
Dear sirs and madams:

We respectfully comment as follows on the proposed amendments:

**First Comment**

1) Line number 712 in Section 3.1.

2) Undo proposed change as ANSI is international and these are international procedures. It is unreasonable to limit appeals to US Persons only. Non-U.S. Persons should equally be entitled to due process and fair treatment.

3) Return to original text: “Persons who have directly and materially affected interests and who have been or will be adversely affected by any action or inaction …..”

**RESPONSE:** Thank you, but disagree. The ANSI International Procedures governs U.S. participation at ISO by U.S. National Interested Parties through ANSI (and ANSI-Accredited U.S. TAGs). Accordingly, appeals related to this process are properly limited to U.S. National Interested Parties (as is TAG membership). Appeals related to U.S. participation at ISO, including procedural compliance with ISO’s rules, would be subject to ISO’s appeals procedures or, if they involve the behavior of a U.S. TAG Member, potentially the appeals process of the relevant ANSI-Accredited U.S. TAG to ISO.

**Second Comment**

1) Line number 1380 in Section B9.

2) Undo proposed change as ANSI is international and these are international procedures. It is unreasonable to limit appeals to US Persons only. Non-U.S. Persons should equally be entitled to due process and fair treatment.
3) Return to original text: “The provision of appeals is important for the protection of
directly and materially affected interests ….”

RESPONSE: Thank you, but disagree. See above.

Third Comment

1) Line number 1387 in Section B9.

2) Undo proposed change as ANSI is international and these are international procedures. It is
unreasonable to limit appeals to US Persons only. Non-U.S. Persons should equally be entitled to due process and fair treatment.

3) Change the text to instead read as follows: “Directly and materially affected interested persons
have the right…..”

RESPONSE: Thank you, but disagree. See above.

Fourth Comment

1) Line 1396 in Section B9.2(3).

2) Undo proposed change as ANSI is international and these are international procedures. It is
unreasonable to limit appeals to US Persons only. Non-U.S. Persons should equally be entitled to due process and fair treatment.

3) Return to original text: “Appeals procedures shall provide for participation by all parties
concerned…..”

RESPONSE: Thank you, but disagree. See above.

Respectfully submitted,

[Signature]

Hugh Pratt, Ph.D., for CPLSO

[Signature]

Arthur G. Sapper, Counsel for CPLSO