

From: Patrick Davison <PDavison@mhi.org>

Sent: Monday, December 9, 2019 12:32 PM

To: PSA Department <PSA@ansi.org>

Subject: Public Comment: ANSI OMF - For your information - Proposed Revision to the ANSI Essential Requirements - Available for Public Comment

Hello,

Thank you for the opportunity to submit comments on the proposed revision to ANSI Essential Requirements. Please accept the following as comments:

Commenter	Clause No.	Paragraph	Type	Comment	Proposed change
Patrick Davison – MHI	2.5.1 (c)	All	GE	<p>Additional clarification is needed.</p> <p>As an example, if developer has eight interest categories identified in their procedures, but on a particular project, only five of the eight categories are deemed to be required, would notation of this requirement in the PINS be sufficient to avoid having to demonstrate that the developer did unsuccessful targeted outreach to find representation in an interest category that was not filled?</p> <p>Alternatively, if the same developer identified a ninth interest category was required, would the developer be required to provide a definition for the interest category?</p>	(c) the interest categories that will (are expected to) comprise the consensus body. <u>If the interest categories differ from the categories outlined in the developer's written procedures, the developer shall identify which interest categories would not be filled, or define which new interest categories would be created, or both.</u>
Patrick Davison – MHI	2.5.1 (c)	All	GE	<p>Who is authorized to make the decision about the interest categories that are or are expected to comprise the consensus body?</p> <p>Does the developer or the consensus body have the right to disregard their existing interest categories and establish new ones?</p> <p>It seems that this clause could have the unintended consequence of allowing the developer to substantially deviate from their procedures.</p>	(c) the interest categories that will (are expected to) comprise the consensus body. Developers should utilize the interest categories outlined in their written procedures. <u>If the interest categories differ from the categories outlined in the developer's written procedures, the developer shall identify which interest categories would not be filled, or define which new interest categories would be created, or both.</u>

Kind regards,

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