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From: Anne Caldas
Sent: Wednesday, March 17, 2021 4:24 PM
To: Sarah Schneider; 'info@coolroofs.org'
Cc: Jim Thompson; Anne Caldas
Subject: Response to public comments - Proposed revisions to the ANSI Essential Requirements - CRRC
Attachments: ExSC_025_2021_ER TG Report from 2019.pdf; ExSC_017_2019_030921.pdf; ExSC_017H_2019_CRRC.pdf

Greetings –

We hope that you are well.

Thank you for submitting the attached public comments in response to proposed revisions to the ANSI Essential Requirements (www.ansi.org/essentialrequirements) announced in Standards Action in December 2019. Background on the original proposed revision is included in the attached report (ExSC_025_2021). The ExSC has considered all public comments and as a result, edited the original proposed revision, now attached here in its final edited form (ExSC_017). This edited version was approved by the ANSI ExSC in February 2021 and will be submitted to the Executive Committee of the ANSI Board of Directors for final approval in March 2021 for incorporation into the 2022 edition of the *ANSI Essential Requirements*.

Please also note that consistent with recommendations in the attached ExSC TG Report, ANSI has updated our website to provide easy access to information about the American National Standards (ANS) process and how to participate in it. Please visit the new ANS pages, including these: <https://www.ansi.org/american-national-standards/ansi-introduction/overview#introduction>, <https://www.ansi.org/american-national-standards/info-for-the-general-public/general-public> and <https://www.ansi.org/american-national-standards/info-for-standards-developers/standards-developers>.

Responses to your comments and suggestions are presented here by section:

Original Lines 25-71: 2.3 Balance

- **CRRC (H):** Lines 52-53 and FN 3 - 2.3 Balance. Please refer to the attached ExSC_025 for background. With respect to the deletions from the optional list of interest categories listed in FN3, the ExSC views a "professional society" or "trade association" as a general membership category rather than the interest category they represent on a consensus body. For example, a trade association is presumed to represent the industry/stakeholders for which the trade association exists, so an industry trade association is appropriately classified as "industry".

Original Lines 73-88: 1.5 & 2.5 Notification of Standards Development

- Lines 73-78, 79-84 "reasonable advance" should instead be "clear and definitive". This proposal was not accepted; please see the edited version of the proposal that uses "timely and adequate". Such terminology will always involve judgement, unless an ASD's procedures specify a time period, in which case that time period applies. The ExSC does not wish to prescribe every timeframe because ASDs' models differ.
- The *ANSI Essential Requirements* intentionally includes a mix of very specific requirements, e.g., 30-day PINS notice, and flexible requirements, e.g., ballot durations, to allow for flexibility among the 240 ANSI-Accredited Standards Developers (ASDs). An ASD's implementation of any of ANSI's procedural requirements will ultimately be judged by the BSR, the ExSC and/or the Appeals Board as the case may be – as well as through an ASD's appeals process.
- With respect to the new text "However, interest categories shall not be created for the purpose of avoiding balance requirements", the ExSC notes that new ASDs or the uninformed may not view such an action as problematic; the new

text addresses some of the concerns voiced routinely that balance can be manipulated – intentionally or unintentionally.

Again, thank you for your interest and your comments.

Sincerely,
Anne

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