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From: Anne Caldas
Sent: Wednesday, March 17, 2021 4:56 PM
To: Patricia Sena
Cc: Jim Thompson; Anne Caldas
Subject: Response to public comments - Proposed revisions to the ANSI Essential Requirements - UL
Attachments: ExSC_025_2021_ER TG Report from 2019.pdf; ExSC_017_2019_030921.pdf; ExSC_017X_2019_UL.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/ans-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 Line 52: Footnote 3 – Interest Category examples

- Lines 35-53 and FN 3 - concern about deletion of trade associations and professional societies from footnote and also that such groups should not be in GI.
 - Response: 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 75 and 81: Is use of "reasonable" necessary?
 - Response: Please see the edited version that incorporates "timely and adequate". "Adequate notice" is a term that is not new in this proposed revision. The "timeliness" and "adequacy" of the notice is judged either against the ASD's procedural requirements or the ANS-related context, for example, ANSI's PINS Notice is 30 days, but other procedural requirements vary in terms of the number of days. This allows ASDs flexibility, within the context of preserving due process and promoting participation.

Original Lines 107-156: Appeals

- Lines 142-145, proposed edit.

- Response: Proposed edit was not accepted as participants are not required to conclude *ANSI's* appeals process prior to submission of a BSR-9 or BSR-109 for approval of a document by ANSI as an ANS; they are required to conclude the ASD's appeals procedures.

Again, thank you for your interest and your comments.

Sincerely,
Anne

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