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July 16, 2020

American National Standards Institute  
11 West 42<sup>nd</sup> Street  
New York, NY 10036

RE: Public Comments – *ANSI Essential Requirements*, section 3.2 Commercial Terms and Conditions, Due: July 20, 2020

Dear Sir or Madam;

I have reviewed the proposed revisions to Section 3.2 of the *ANSI Essential Requirements* and offer the following comments and observations:

Comments Regarding Standards:

To be effective, standards must be available to those whose jobs require them to comply with a standard and those whose health and wellbeing, along with that of co-workers and the general public, are dependent upon information contained in a standard.

Deployment of these standards is critical for proper dissemination of this information.

Key components of deployment for standards include:

1. Raising awareness of an applicable standard;
2. Making it readably accessible; and,
3. Making it reasonably priced.

I feel that the last component, price, needs to be changed.

Ideally, standards should be open-sourced, without copyright, and available for free for anyone needing access.

Another approach would be to have a standard's pricing reflect the development costs (often shouldered by volunteers who donate their time, expertise, and travel expenses to do the heavy-lifting of actually developing and maintaining a standard) and distribution costs (next to nothing today for downloads via the Internet).

Lastly, a distribution model for standards in which competition is encouraged and pricing is not uniform across the many suppliers available in the marketplace would benefit purchasers of standards.

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RE: Public Comments – *ANSI Essential Requirements*, section 3.2 Commercial Terms and Conditions

Proposed Revision of section 3.2.2:

Imbedding referenced standards within an ANS is authorized in the proposed revision by use of footnote 1 to this section. By exempting "...third-party standards, when such documents are incorporated by reference into the text of an ANS...", the footnote negates the exclusion of "proprietary products" in 3.2 as it applies to copyrighted third-party standards.

Certain ANSs contain reference to other ANS or ISO standards – necessitating an entity wishing to comply with an ANS to acquire, or access, the referenced standard(s). For example, ANSI/SAIA A92.20 – 2020 references thirteen (13) standards that one would need to acquire and maintain, at substantial cost, in order to ensure continuing compliance with this single ANS.

I encourage you to consider my earlier comments on pricing of standards as you consider revisions to this section of this document.

Thank you for allowing me to share my thoughts on this matter.

Please feel free to contact me with any questions regarding my comments.

Sincerely yours,



John J. Brewington, Jr., CAFM, CEM

Chair: ASC A10.31

Member: ASC A92

ASC A92.2

ASC A92.20

ASC A92.22

ASC A92.24

ASC Z15.1