**Subject: Comments on ExSC 8096**

Conflict and duplication in American National Standards has been the subject of discussion for a long time. The current effort to improve the situation is laudable, but it is not clear that the proposal defined in ExSC 8096 is ready for prime time.

It is my understanding that the problem has been relatively rare, but the proposed procedures may result in substantial overhead for all SDOs.

**Section 2.4.1**

The subject here is “duplication of scope.” We assume, although it is not stated, that this is the scope of the standard rather than the scope of the developer. Even so, there is not sufficient information to determine what the scope of the standard is. Many of the write-ups (PINS) are too vague to use as the basis for determination of conflict/duplication, at least in part because at the very beginning of a project there may not be a precise statement of what the standard will eventually contain. There is no requirement for subsequent, fuller descriptions such as the scope statement that is common to most standards but which may be in flux for much of the development.

It is also true that different collections of standards developers (the participants) have reasons for solving the same problems in different ways; ways that may not be apparent to the casual observer. [[1]](#footnote-1)

**Section 2.4.3**

This section calls upon developers to make a good faith effort to resolve issues. In particular, it envisions a “preliminary comprehensive review” and “outreach to other SDOs involved in similar areas” to look for standards or standards projects. Apart from the obvious difficulty in doing that (see the discussion above) it is problematic that two very competitive SDOs would be eager to share their work or their plans, or for one to signal the other that it wants to start work in a particular area.[[2]](#footnote-2)

**Section 2.5**

This text is not changed. However I don’t understand why an SDO is not required to advise an IEC TAG, when it is required to advise an ISO or ISO/IEC JTC1 TAG.

For completeness, this procedure should also identify the requirements when the duplication or conflict results because one SDO wishes to adopt an ISO or IEC standard which duplicates or conflicts with an existing ANS (or candidate ANS or PINS or …). In our industry there are several such cases where the current TAG holder could propose the adoption of a conflicting standard.

**Section 2.5.1**

See the discussion in 2.4.1 above about the vagueness of PINS statements. I would also question the effectiveness of merely advising that a revised PINS should be submitted if there is “substantial change”. The top level description is frequently not sufficient to make a determination from the outside as to relevance.

**Section 2.5.5.1**

One way that SDOs can and do cooperate is to reference each other’s documents rather than creating their own. For that reason I oppose the idea that withdrawal of a standard does not require a PINS. Other standards which reference that standard need advance warning to deal with the problem.

**Section 2.5.2**

Same comment regarding IEC as is noted above for Section 2.5.

**Section 4.3**

Item ‘c’ states that there should be “thorough investigations of existing ANS an already announced proposed ANS prior to development of a new candidate ANS.” This leads to some practical issues as to where each of the parties is in the process. If I have submitted a PINS, and have not started development, does that still constitute duplication on the part of an SDO that now wants to work in that area? What happens if the PINS was actually filed as a tactic to prevent other SDOs from developing an ANS for that area? To my knowledge there is no expiration date for a PINS.

**Suggestions**

Based on this analysis I believe there are several things which the ExSC needs to address in this proposal.

1. A more definitive definition of “scope” and how it comes about.
2. More detail on the level of cooperation that an SDO must provide to any other SDO inquiring about details of a project. In general mechanisms to make the investigation relatively convenient and inexpensive.
3. The status, in determining conflict or duplication, of a PINS statement absent any significant text for a standard.
1. These may be technical considerations, or simply the belief that “my” topic could not possibly get addressed properly in “their” group (for example, they are the cable companies and we the telephone companies. It may also be that the members simply don’t want to have to join ‘n’ different groups to get what they want done. [↑](#footnote-ref-1)
2. The write-up appears to presume that the SDOs determine their projects. In my experience it is frequently their industry members that do so – and conflicts between SDOs are most likely to be conflicts between industries or industry sectors, and cannot be resolved at the SDO level. [↑](#footnote-ref-2)