

Comments from ASD INCITS in response to the announcement of proposed revisions to the ANSI Essential Requirements: Due process requirements for American National Standards

INCITS notes ANSI's desire to promote a harmonized standards development environment, minimize duplication, and avoid the promulgation of conflicting ANS. However, ISO/IEC JTC 1 has had many discussions on this point, and the following resolution concerning standardization in the ICT Sector was adopted in the 2008 JTC 1 Plenary:

Resolution 49 - Clarification on Consistency of Standards vs. Competing Specifications

JTC 1 notes the nature of standardization is to attract innovative ideas from multiple sources, choose the best ones and codify them in specifications that facilitate widespread use.

Further, consistent with ISO's and IEC's "one standard" principle (for example TMB's policy and principle statement on Global Relevance), there are times when one standard is all that is required to meet the needs of the marketplace, especially in a particular application area, and there are other instances where multiple standards make the most sense to respond to market requirements and to the needs of our society. In reducing the number of alternatives to a reasonable minimum, JTC 1 and other SDOs have demonstrated that it is not necessary and may not be desirable to choose only one alternative or option for standardization.

Further, JTC 1 notes that the cycle of innovation in the ICT sector has resulted in the continuous introduction of new technologies that improve upon existing standards. Any attempt to choose only one standard would ignore and threaten to inhibit the cycle of innovation that continues to fuel this industry.

Therefore, JTC 1 recognizes its commitment to ISO's and IEC's "one standard" principle; however, it recognizes that neither it nor its SCs are in a position to mandate either the creation or the use of a single standard, and that there are times when multiple standards make the most sense in order to respond to the needs of the marketplace and of society at large. It is not practical to define, a priori, criteria for making these decisions. Therefore each standard must be judged by the National Bodies, based on their markets, on its own merits.

Accordingly, INCITS believes that JTC 1 principles cited above should apply to ANSI standards work in the ICT space.

INCITS notes that the existing Essential Requirements already contain guidelines for ASDs to provide a "good faith effort" examination of any alleged conflicts. Could ANSI provide evidence or examples that the current procedures are not satisfactory in this regard?

INCITS is not supportive of the proposed changes as written. INCITS believes that the proposed changes are too heavy-handed, would be costly to implement and contain significant flaws and inconsistencies.