

These comments relative to the ANSI ExSC proposed procedural changes regarding conflict and duplication (documented in ExSC 8096) are mine alone and come from the perspective of a long-time ANSI participant and also as an independent standards consultant. They do not necessarily reflect the views of any of the clients that I work with:

The proposed changes appear to offer some useful guidance regarding reducing conflict and duplication and, therefore, probably are not harmful if they are implemented.

However, in my opinion, they do not address the key issues which may, in fact not have a procedural solution. In today's business environment, especially in industry segments that have not been traditional ANSI standards participants, conflict and duplication may be unavoidable because of well-entrenched individuals and organizations that see it in their best interest to have an American National Standard consistent with their technology or approach. Implementers may wish, for business reasons, to claim compliance with one or more standards which might appear to someone outside that industry segment to be duplicative. I don't believe ANSI should be, or would want to be, the deciding body on issues which could be perceived as restraint of trade. ANSI may need to take a more "hands off" approach which would let the marketplace determine which among competing standards will get the most implementations. As long as a developer follows ANSI-approved procedures and has a following that supports their standard, ANSI should not try to implement "a harmonized set of American National Standards" (the meaning of which is unclear). There is little cost to ANSI for having multiple standards in a particular area and the marketplace is going to decide on the "winners" in any case. "Duplication" and "compelling need" may well be in the eye of the beholder.

One area where ANSI can play a more direct role is in dispelling the notion that the first developer accredited in a field, or the first to submit a draft standard, has some special status that precludes or works to the detriment of subsequent developers. A developer who only represents a small population of interested parties should not be able to use these arguments to the detriment of what may be a more broad-based or capable developer who didn't happen to get to ANSI first. Again, let the market decide.

A second area where ANSI can play a role is limiting the use of delaying tactics where one developer (or groups closely aligned with the developer) can use the flooding of a developer with comments as a delaying tactic.

Thank you for the opportunity to comment on this important area.

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