**From:** Gillerman, Gordon [mailto:gordon.gillerman@nist.gov]
**Sent:** Monday, December 06, 2010 3:54 PM
**To:** PSA Department
**Cc:** Mary F. Donaldson; David Alderman; Rioux, Nathalie; Erik Puskar
**Subject:** NIST Standards Services Comments

NIST proposes additional language in ‘tracked changes’ for the attached document that addresses the following weaknesses in the proposed revisions:

1. The published proposed changes do not provide enough opportunity for all of the stakeholders who were party to a PINS deliberation to provide direct input into the ANSI process.  We’ve added language that provides the commenter or other  stakeholders who participated in the PINS deliberations the opportunity to file their own deliberation reports.  In addition, these individuals will be able to request informal mediation within 30 days of the filing of the ASDs PINS deliberation report and not be shut out of the process if the BSR-9 or 109 quickly follows the deliberation report.

2. The published proposed changes do not address the issue of concurrently announced standards development.  We’ve added language to address this situation.

3. The published proposed changes do not address the issue  of the development of overlapping standards – a cause of market confusion.  In response, we’ve added text to address this issue.

4. We’ve also added editorial text for clarity.

In addition, while we support the avoidance of unnecessary duplication and conflict that has the effect of creating market confusion, we are also cognizant of the benefits of healthy standards competition in some sectors, particularly in the Information and Communications Technologies (ICT) sector, that are undergoing rapidly advancing technology and innovation.  We suggest that claims of duplication and conflict in development of ANS's be adjudicated on a case-by-case basis weighing the potential merits of ”standards competition" and the potential drawbacks of "standards duplication" keeping in mind sectoral differences.

Sincerely,

Gordon Gillerman

Director

Standards Services Group

National Institute of Standards and Technology

(301) 975-8406