

To: Recording Secretary, ANSI ExSC (psa@ansi.org)

From: IEEE Standards Association

Subject: Comments on Proposed Procedural Revisions, ExSC 8169

IEEE-SA appreciates the opportunity to respond to the public call for comments on a proposed revision of section 2.5 of the ANSI Essential Requirements, as described in ExSC 8169.

We would agree that notification of planned standards development is an essential requirement to demonstrate the opportunity for all directly and materially affected parties to participate in the development of American National Standards. To date, submitting the PINS transmittal form, which results in announcements using Standards Action, has been successful.

However, we believe that setting an absolute 5-year limit on the validity of a published PINS notice, without possibility of extension, will cause confusion. Many of the complex standards developed within the IEEE Standards Association take years to develop – and our usual internal project authorization (called a PAR) is issued for a 4-year period, with the possibility of extensions (usually just 1 or 2 years, and only when supported by a demonstrated need).

Should ANSI implement this proposal, it will likely cause unnecessary overhead and confusion in the public – IEEE-SA would have to request a new PINS notification for a project which is already many years underway, and in fact would be closing relatively soon after the notification. We have a very strong internal tracking system that insures management of open projects – and the closure of projects that are not making appropriate progress to completion.

[Should a developer file a new PINS to replace an expiring PINS for an active project, it might also invite comments and a deliberation about “compelling need for the... standards project”, as noted in this section. We believe that inviting such discussions, based solely on the length of the standards development period, is not in the interests of ANSI or ASDs.]

Consequently, we would respectfully offer some potential alternatives:

1. For approved projects which have not filed a BSR-8/108 by the five-year deadline, ANSI could ask the ASD for a suitable explanation within a given period (possibly 60-90 days). With adequate explanation, ANSI could permit up to two 2-year PINS extensions, should the ASD demonstrate adequate progress and a plan for completion by a nine-year deadline from the initial PINS publication; or
2. ANSI could grant IEEE-SA an exemption from the 5-year limit, and raise it to 9-10 years, but require that IEEE-SA file for appropriate PINS extensions as needed to comply; or
3. ANSI could retract this proposal, as it imposes additional administrative burden without any substantiation of a requirement for change (for example, if the issue is that ASDs are not requesting extensions appropriately or responding to communications, the solution should be to allow those individual PINS notices to expire, rather than to deny any possibility for extensions).

Thank you for your time to consider our comments. We are available to join in ExSC or other discussions as appropriate to insure a successful outcome of this proposed change.

Regards,
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