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Sent: Monday, November 25, 2019 2:07 PM

To: PSA Department <PSA@ansi.org>

Cc: Thomas Schuelke <tschuelke@fraunhofer.org>; Elisabeth Opie <office@elisabethopie.com>; Marco Lo Bue <lobue@elisabethopie.com>; Lachlan Scully <scully@elisabethopie.com>; Stefanie Mielert <stefanie.mielert@iis.fraunhofer.de>

Subject: ANSI Standards Action - October 25, 2019 – Call for comment and questions - Proposed Revision to the Operating Procedures of the ANSI Executive Standards Council (Annex A)

Dear Madam/Sir,

Annex A of the ExSC Operating Procedures currently lists the procedures for change in the Secretariat and Consensus Body relationship within an ANSI Accredited Standards Committee (ASC). These procedures were originally contained within Clause 2.5.1 of the 2002 ANSI Procedures for the Development and Coordination of American National Standards (ANSI Procedures). The ExSC chose to list the procedures as Annex A in the ExSC Operating Procedures as it believed it would be useful to explain the relationship between the secretariat and consensus body which constitutes an accredited standards committee.

The 2002 ANSI Procedures were replaced with Clause 4.1 of the 2003 ANSI Essential Requirements: Due process requirements for American National Standards. As a result, the reference to the abovementioned procedures and ASCs was removed given that ANSI no longer distinguished between methods of accreditation.

In accordance with the above, there does not appear to be any reason to withhold support for the removal of Annex A from the ExSC Operating Procedures as it is a process no longer used by ANSI.

Separately, we note that Fraunhofer IIS submitted comments on 11 November 2019 in response to a separate call for public comments in relation to proposed revisions to the ExSC Operating Procedures. Fraunhofer reiterates its suggestion that to avoid confusion and ensure consistency, any future proposed revisions for one ANSI document should be contained within a single call for comments instead of multiple calls for comment.

Sincerely,

Stefanie Mielert

Kind regards / Mit freundlichem Gruss,

Stefanie Mielert

Rechtsanwältin

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