30 October 2011

To: Recording Secretary of ANSI Executive Standards Council (ExSC)

From: Michael W. Woodford (Vice President, Standards, AHRI)

Subject: Comment on Proposed ANSI Revisions (ExSC 8189)

Please find below our comment on the ANSI proposed revisions (ExSC 8189) provided in the 30 September 2011 issue of Standards Action.

AHRI supports this proposal that focuses on the timeliness of the PINS deliberation and the follow-up process. In addition, we support the ExSC's continuation of work on two issues in particular:

- Development of additional guidance text for inclusion in the current PINS Informational Summary and
- Work by a Working Group of the ExSC to further develop a proposed definition of “duplication.”

We support the specific proposed revisions to 2.5 of the ANSI Essential Requirements including the revised requirements for the PINS Deliberation Report expressed in 2.5.1.3.

As noted, AHRI is supportive of the ExSC Working Group's further development of a proposed definition of "duplication." Further, we would support an additional role by ANSI in handling claims of conflict and/or unnecessary duplication. We would support a more specific role by the ANSI ExSC early in the ANS development process to address claims of conflict and/or duplication.

Thank you.

MWW