

ASC A92 – AERIAL PLATFORMS COMMITTEE POLICIES AND PROCEDURES FOR THE DEVELOPMENT OF AMERICAN NATIONAL STANDARDS

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Introduction

The Scaffold & Access Industry Association (SAIA) is a non-profit trade 501(c)(6) association committed to raising the standards of professionalism within the scaffold and access industry. The SAIA represents all facets of the scaffold & access industry through various councils that include, aerial work platform, construction hoist, fall protection equipment, international, industrial, mast climbing, plank and platform, shoring, supported scaffold and suspended scaffold. Through its various programs, the SAIA promotes safety, training and a highly professional, responsible image of the scaffold and access professional. The SAIA delivers hundreds of safety training programs a year at various locations throughout the world. These programs cover all aspects of scaffold and access safety and equipment use. The SAIA is also the secretariat for the American National Standard Institute, ASC A92 standards.

In response to the needs of our industry, the ASC A92 Aerial Platforms Committee was formed in 1948. The SAIA serves as the Secretariat. The purpose of the standards is the prevention of accidents and injuries, as well as, establishing criteria for the manufacturers. The standards also aid the manufacturers, dealers, owners, users and operators of the platforms to understand their various responsibilities.

This document defines the operating policies that the ASC A92 will use to comply with the essential requirement of the American National Standards Institute for ANSI standard developers. Requirements for these policies and procedures are defined in *ANSI Essential Requirements: Due process requirement for American National Standards* (www.ansi.org/essentialrequirements). The *ANSI Essential Requirements* is considered as a companion to this manual and as the principal reference document for these operating policies and procedures.

Valid consensus standards must meet national and international guidelines for quality, openness, balance and fairness. The policies and procedures contained in this manual, together with the *ANSI Essential Requirements* are intended to assure the national and international standards community that the SAIA and the ASC A92 committee embraces the ANSI/ISO guidelines for consensus standards development. Through the due diligence in carrying out these policies and procedures, ASC A92 will produce American National Standards worthy of the stakeholder community it serves.

ASC A92-AERIAL PLATFORMS COMMITTEE

POLICIES & PROCEDURES

Section 1.0 General

These procedures meet the requirements for due process and development of consensus for approval of American National Standards as given in the *ANSI Essential Requirements: Due process requirements for American National Standards latest edition* herein referenced and incorporated.

Written procedures (including electronic communications) shall govern the methods used for standards development and shall be available to any interested person.

Section 2.0 Organization of the Committee

The Accredited Standards Committee (ASC) shall consist of its consensus body and secretariat.

2.1 Title

The title of the consensus body shall be: Accredited Standards Committee (ASC) A92 - Aerial Platforms Committee.

2.2 Scope

The scope of the consensus body shall be: To develop safety guidelines for the design, construction, testing, maintenance, inspection, training, use and operation of elevating and rotating aerial devices, work platforms and vertical devices primarily used to position personnel. However the scope of this committee does not include equipment covered by the following standards:

ASME A17	Safety Code for Elevators, Dumb-waiters, Escalators and Moving Walks
ASME B30	Safety Standards for Cableways, Cranes, Derricks, Hoists, Hooks, Jacks and Slings
ITSDF B56	Powered and Non-powered Industrial Trucks
A10.8	Safety Requirements for Scaffolding
A14	Safety in the Construction, Care and Use of Ladders
A120	Powered Platforms (Scaffolds) Used for Window Cleaning
NFPA 1904	Testing Fire Department Aerial Ladders and Elevating Platforms

2.3 Interest Category

The interest classification and definitions of ASC A92 members shall be:

- C-1 Consumers/Users** – Consumers, users, employers and/or employer groups of aerial equipment industry
- C-2 Directly Affected Public** – Entities directly affected by the aerial equipment industry
- C-3 Distributors and Dealers** – Distributors, Dealers or other Sellers, that may or may not be Installers, in the aerial equipment industry
- C-4 Consultants** – Consultants with special knowledge of some aspect of the aerial work platform industry.
- C-5 Government (Users, General Interest)** – Government
- C-6 Industrial/Commercial** – Companies engaged with a business or service allied to the aerial equipment industry not defined by any other classification.
- C-7 Insurance** – no longer used
- C-8 Labor** – Labor union, employee association
- C-9 Manufacturers** – Manufacturers of aerial equipment
- C-10 Professional Societies** – no longer used
- C-11 Regulatory Agencies** – a governmental agency that regulates businesses in the public interest

- C-12 Testing Laboratories** – Entities involved in independent testing and/or inspection
- C-13 Not-for-Profit/Professional Societies** – Entities or Associations established as not-for-profit seeking to further the access profession, the interest of individuals engaged in that profession and the public interest.
- C-14 Component Manufacturers** – Manufacturers of components utilized in aerial equipment covered by ANSI/SAIA A92 standards

2.4 Balance

The membership shall be sufficiently diverse to ensure reasonable balance without dominance by one of the above interest categories, an individual or organizations. No single interest category shall exceed one-third of the membership. Membership categories shall also be reviewed annually to ensure continued reasonable balance.

Section 3.0 Responsibilities

3.1 Consensus Body

The consensus body shall be responsible for:

- a) Proposing American National Standards within the scope of the ASC;
- b) Voting on approval of proposed American National Standards within the scope of the ASC;
- c) Maintaining the standards developed by the ASC in accordance with *ANSI Essential Requirements*;
- d) Adopting ASC procedures for interpretations of the standard(s) developed by the consensus body;
- e) Responding to requests for interpretations of the standard(s) developed by the consensus body;
- f) Adopting ASC procedures and revisions thereof;
- g) Other matters requiring consensus body action as provided in these procedures.

3.2 Secretariat

The secretariat shall be responsible for:

- a) Applying for ASC accreditation by ANSI and maintaining accreditation in accordance with ANSI requirements, including submission of the consensus body roster;
- b) Overseeing the consensus body's compliance with these procedures;
- c) Maintaining a roster of the consensus body and a list of standards for which the consensus body is responsible;
- d) Providing administrative work, including secretarial services; preparation of meeting notices and the handling of meeting arrangements; preparation and distribution of meeting agendas, minutes, ballots and draft standards; and maintenance of adequate records;
- e) Submitting candidate standards approved by the consensus body, with supporting documentation, for ANSI review and approval as American National Standards;
- f) Publishing approved standards, revisions and addenda in accordance with *ANSI Essential Requirements*;
- g) Performing other administrative functions as required by these procedures;

- h) Providing a written agreement to ANSI defining explicit division of these responsibilities if composed of more than one organization (i.e., co-secretariats).

Section 4.0 Officers

There shall be a chair and a vice-chair elected by a simple majority of the consensus body and confirmed by the secretariat. Each will serve until a successor is selected and ready to serve. The vice-chair shall carry out the chair's duties if the chair is temporarily unable to do so.

Section 5.0 Membership

Members of the consensus body shall consist of organizations, companies, government agencies, independent experts and others as defined in 2.3 having a direct and material interest in the activities of the ASC. Members of the consensus body are represented on an organizational level, and are allowed one representative and one alternate. The selection and addition of members, along with their interest category, shall be subject to approval by a simple majority vote of the consensus body after the application has been processed in accordance with 5.1. The termination of members shall be subject to approval by a simple majority vote of the consensus body after a review of the membership in accordance with 5.2.

5.1 Application

A request for membership on the consensus body shall be addressed to the secretariat and shall indicate the applicant's direct and material interest in the ASC's work, qualifications and willingness to participate actively. In addition, the applicant shall identify a representative (and an alternate, if desired). Applications for membership on the consensus body are considered annually.

5.1.1 Recommendation

In recommending appropriate action to the consensus body on applications for membership, the secretariat shall consider the:

- a) Need for active participation by each interest;
- b) Potential for imbalance by a single interest category;
- c) Extent of interest expressed by the applicant and the applicant's willingness to participate actively;
- d) Qualification of the representative identified by the applicant organization, company or government agency.

5.1.2 Diverse Interests

If distinct divisions of an organization demonstrate independent interests and authority to make independent decisions in the area of the activity of the ASC, each is permitted to apply for membership.

5.1.3 Committee Size

With guidance from the consensus body of the Committee, the secretariat may consider reasonable limits as to the committee size.

5.1.4 Membership Fees

The secretariat may charge an annual maintenance fee to members of the consensus body not to exceed \$250.00. A waiver of fees may be granted at the discretion of the secretariat.

5.2 Review of Membership

The secretariat shall review the consensus body membership list annually with respect to the criteria of Clause 5. Members are expected to fulfill obligations of active participation as stipulated. Active participation is defined for the purpose of these procedures as:

- a) No more than three consecutive failures to vote on letter ballots;
- b) No more than three consecutive absences from annual meetings scheduled;
- c) Payment of annual dues.

Where a member is found in default of these obligations, the secretariat shall direct the matter to the consensus body for appropriate action, which may include termination of membership.

5.3 Observers and Individual Experts or Consultants

Individuals and organizations having an interest in the ASC's work may request listing as observers. The consensus body may also select individual experts or consultants to assist it. Individual experts or consultants shall serve for a renewable term of one year and shall be subject to approval by vote of the consensus body. Observers, individual experts or consultants shall be advised of the ASC's activities, may attend meetings, and may submit comments for consideration, but shall have no vote. The chair of the committee or subgroup may excuse observers, experts, and consultants for the purposes of making motions and voting.

5.4 Interest Categories

All appropriate interests that are directly and materially affected by the standards activity of the ASC shall have the opportunity for fair and equitable participation without dominance by any single interest category, individual or organization. Each member shall propose its own interest category as appropriate and in accordance with the consensus body's established categories. (See 2.3 and 2.4)

The interest categories shall be established or revised by a vote of the consensus body. The rationale for the selection of categories shall be included in the consensus body ballot and submitted to ANSI as part of the accreditation requirements.

5.5 Membership Roster

The secretariat shall maintain a current and accurate consensus body roster and shall distribute it to the members and their consensus body representatives at least annually and otherwise on request. The roster shall include the following:

- a) Title of the ASC and its designation;
- b) Scope of the ASC;
- c) Secretariat;
- d) Officers: chair and vice-chair;
- e) Members: name of organization or agency, its representative and alternate (as applicable), addresses, contact information and business affiliations;
- f) Interest category of each member;
- g) Tally of interest categories: total of voting members and subtotals for each interest category;
- h) For each subgroup: title, chair, and names and contact information of all members.

Section 6.0 Subgroups Created By the Consensus Body

When one or more subgroups (subcommittees, working groups, technical subcommittees, writing groups, etc.) are formed to expedite the work of the consensus body, their formation (and later disbandment) requires approval by a majority vote of the consensus body and appropriate public notice. The scope and duties delegated to the subgroup shall be approved at the time it is formed, and subsequent changes in scope or duties shall also require approval by the consensus body. Members of the subgroups are represented as individuals.

The subgroup is responsible for assisting the consensus body (e.g. drafting all or a portion of a standard, drafting responses to comments, drafting positions on international standards, or other purely advisory functions). Deliberations of these groups shall remain confidential to the members of the subgroup. Discussions within the subgroups are solely for purposes of creating draft standards and are not to be discussed or divulged outside the subgroup. Draft standards presented to the consensus body shall embody the final consensus thinking of the subgroup.

6.1 Chairperson and Members of Subgroups

The chair of a subgroup shall be appointed by the chair of the ASC A92 main consensus body and confirmed by the main consensus body. Members of a subgroup shall be nominated by the chair of the subgroup and confirmed by the main consensus body. Members must have sufficient experience with the specific products covered by the standard to contribute to the drafting of the standard. The scope, duties, and membership of all subgroups shall be reviewed by the ASC A92 consensus body annually. The officers and members of a subgroup need not be members of the consensus body.

6.2 Approval of Standards

Draft standards and any substantive change in the content of a standard proposed by a subgroup shall be referred to the consensus body for approval.

6.3 Subgroup Size

The secretariat may consider reasonable limits as to the subgroup size ensuring at all times the process seeks a balance of interests and participants from diverse interest categories are continually sought with the objective of achieving balance.

6.4 Membership Fees

The secretariat may charge each subgroup member who is not the primary or alternate representative of an organization on the Main Committee an annual maintenance fee not to exceed \$75.00 for each subgroup on which they are a member. A waiver of fees may be granted at the discretion of the secretariat.

6.5 Record Retention

All standards related records shall be prepared and retained to provide evidence of compliance with these procedures. All materials related to the administration of crafting, editing and approval of a standard shall be kept for at least one full cycle by the secretariat. Once a new standard is published, the committee members and subgroup members shall dispose of all draft copies and related correspondence or materials pertaining to that new standard. Records concerning withdrawn standards shall be retained for at least five (5) years from the date of the withdrawal.

Section 7.0 Meetings

Consensus body meetings shall be held, as decided upon by the consensus body, the chair, the secretariat, or by petition of five or more members (with approval of a simple majority of the consensus body), to conduct business, such as making assignments, receiving reports of work, considering draft

standards, resolving differences among subgroups, and considering views and objections from any source. Meetings of subgroups may be held as decided upon by the members or chair of the subgroup.

7.1 Open Meetings

Meetings of the consensus body shall be open to all members and others having a direct and material interest. At least four weeks notice of regularly scheduled meetings of the consensus body shall be given by the secretariat in ANSI's *Standards Action*; or in other media designed to reach directly and materially affected interests; or in both. The notice shall describe the purpose of the meeting and shall identify a readily available source for further information. An agenda shall be available and shall be distributed in advance of the meeting to members and to others expressing interest. The secretariat may maintain a mailing list of other interests. The chair may excuse non members from the meeting for purposes of making motions and voting or for any reason the chair determine to be appropriate.

7.2 Quorum

A simple majority of the members of the consensus body shall constitute a quorum for conducting business at a meeting. If a quorum is not present, actions shall only be taken subject to subsequent confirmation by letter ballot or vote at a future meeting.

Section 8.0 Voting

8.1 Vote

Except in regard to votes on membership and officer-related issues, each member shall vote one of the following positions:

- a) Affirmative;
- b) Affirmative, with comment;
- c) Negative, with reasons (the reasons for a negative vote shall be given and if possible shall include specific wording or actions that would resolve the objection);
- d) Abstain.

Abstaining votes will be deducted from the total membership number before making calculations.

For votes on membership and officer-related issues, the affirm/negative/abstain method of voting shall be followed.

8.1.1 Vote of Alternate

An alternate's vote is counted only if the principal representative fails to vote.

8.1.2 Single Vote

Generally, no representative shall have more than one vote. However, if two or more organizations appoint the same individual to represent each of them, that individual may cast a separate vote for each organization represented, with no more that two votes cast per representative. The organizations shall confirm in writing to the secretariat that they are aware of and will accept the results.

8.1.3 Voting Period

The initial voting period for letter ballots shall end thirty days from the date of issue or as soon as all ballots are returned, whichever comes earlier. An extension may be granted at the chair's option, when warranted.

The voting period for recirculated letter ballots shall end thirty days from the date of issue or as soon as all ballots are returned, whichever comes earlier. An extension may be granted at the chair's option, when warranted.

A follow-up letter, including by electronic means, requesting immediate return of the ballot shall be sent, as appropriate, to members and alternate members whose votes have not been received within ten calendar days before the ballot closes.

8.2 Actions requiring Approval By a Simple Majority of a Quorum

All business at a committee meeting excluding that described in 8.3 and 8.4.

8.3 Actions Requiring Approval By a Majority

The following actions require approval by a majority of the membership of the consensus body either at a meeting or by letter ballot;

- a) Formation of a subgroup, including its procedures, scope and duties;
- b) Disbandment of subgroups.

Members unable to attend a meeting where a formal recorded ballot or vote is taken, shall be notified of and afforded an opportunity to cast a formal ballot or vote either in advance of or within two weeks following the meeting via electronic correspondence

8.4 Actions Requiring Approval By Two-Thirds of Those Voting

The following actions require a letter ballot or an equivalent formal recorded vote with approval by at least a majority of the membership and at least two-thirds of those voting, excluding abstentions:

- a) Adoption of ASC procedures, interest categories, or revisions thereof;
- b) Approval of a new standard or reaffirmation of an existing one;
- c) Approval of revision or addendum to part or all of a standard.

Members unable to attend a meeting where a formal recorded ballot or vote is taken, shall be afforded an opportunity to cast a formal ballot or vote either in advance of or within two weeks following the meeting via electronic correspondence.

8.5 Authorization of Letter Ballots

A letter ballot shall be authorized by any of the following:

- a) Majority vote of those present at a consensus body meeting;
- b) The chair;
- c) The executive committee (if one exists);
- d) The secretariat;
- e) Petition of five or more members of the consensus body.

8.6 Other Review

Proposals for new American National Standards or reaffirmation, revision or withdrawal of existing American National Standards shall be transmitted to ANSI for listing in *Standards Action* for comment. The content of proposals shall remain confidential until listed in the *Standards Action*.

The secretariat shall determine whether listing of proposed standards actions shall be concurrent with the final consensus body letter ballot and whether announcement in other suitable media is appropriate. The secretariat shall transmit a copy of the proposed new, revised or reaffirmed

standard to the administrator(s) of the appropriate USA Technical Advisory Group(s) at the same time.

Views and objections resulting from the above shall be dealt with in accordance with 8.7. Any substantive change made in the proposed American National Standard shall be relisted in accordance with 8.7.

8.7 Disposition of Views and Objections

When the balloting has been closed, the secretariat shall forward the ballot tally to the chair of the consensus body or, if appropriate, of the subgroup; the chair shall determine whether the expressed views and objections shall be considered by correspondence or at a meeting.

Prompt consideration shall be given to the written views and objections of all participants, including those commenting on the Project Initiation Notification System (PINS) or public comment listing in *Standards Action*.

In connection with an objection articulated during a public comment period, or submitted with a vote, an effort to resolve all expressed objections accompanied by comments related to the proposal under consideration shall be made, and each such objector shall be advised in writing (including electronic communications) of the disposition of the objection and the reasons therein. If resolution is not achieved, each such objector shall be informed in writing that an appeals process exists, refer to section 9, Appeals, herein. In addition each objection resulting from public review or submitted by a member of the consensus body, and which is not resolved must be reported to the ANSI Board of Standards Review (BSR).

When this process is completed in accordance with the written procedures of the standards developer, the standards developer may consider any comments received subsequent to the closing of the public review and comment period, or shall consider them in the same manner as a new proposal. Timely comments that are not related to the proposal under consideration shall be documented and considered in the same manner as submittal of a new proposal. The submitter of the comments shall be so notified.

Unresolved objections along with attempts at resolution and any substantive change made in a proposed American National Standard shall be reported to the consensus body in order to afford all members of the consensus body an opportunity to respond, reaffirm, or change their vote. Any substantive change made in the proposed American National Standard shall undergo public review. All unresolved objections from the consensus ballot and the public review process shall be notified in writing of their right to appeal as stated in section 9, Appeals, herein.

8.8 Report of Final Result

The final result of the voting shall be reported, by interest categories, to the consensus body.

Section 9.0 Appeals

Persons who have directly and materially affected interests and who have been or may be adversely affected by a procedural action or inaction of the consensus body or the secretariat shall have the right to appeal.

9.1 Complaint

The appellant shall file a written complaint with the secretariat within thirty days after the date of notification of action or at any time with respect to inaction. The complaint shall state the nature of the objection(s) including any adverse effects, the clause(s) of these procedures or the standard that is at issue, actions or inactions that are at issue, and the specific remedial action(s) that would satisfy the appellant's concerns. Previous efforts to resolve the objection(s) and the outcome of each shall be noted.

9.2 Response

Within thirty days after receipt of the complaint, the respondent (chair or secretariat representative) shall respond in writing to the appellant, specifically addressing each allegation of fact in the complaint to the extent of the respondent's knowledge.

9.3 Hearing

If the appellant and the respondent are unable to resolve the written complaint informally in a manner consistent with these procedures, the secretariat shall schedule a hearing with an appeals panel on a date agreeable to all participants, giving at least ten working days notice.

9.4 Appeals Panel

The appeals panel shall consist of three individuals who have not been directly involved in the matter in dispute, and who will not be materially or directly affected by any decision made or to be made in the dispute. At least two members shall be acceptable to the appellant and at least two shall be acceptable to the respondent.

9.5 Conduct of the Hearing

The appellant has the burden of demonstrating adverse effects, improper actions or inactions, and the efficacy of the requested remedial action. The respondent has the burden of demonstrating that the consensus body and the secretariat took all actions in compliance with these procedures and that the requested remedial action would be ineffective or detrimental. Each party may adduce other pertinent arguments, and members of the appeals panel may address questions to individuals. *Robert's Rules of Order* (latest edition) shall apply to questions of parliamentary procedure for the hearing not covered herein. The appeals panel rendering shall be available to the appellant and respondent no later than thirty (30) days following petition.

9.6 Decision

The appeals panel shall render its decision in writing to the appellant within thirty (30) days, stating findings of fact and conclusions, with reasons therefore, based on a preponderance of the evidence presented to the appeals panel. Consideration shall be given to the following positions, among others, in formulating the decision:

- a) Finding for the appellant remanding the action to the consensus body or the secretariat with a specific statement of the issues and facts in regard to which fair and equitable action was not taken;
- b) Finding for the respondent, with a specific statement of the facts that demonstrate fair and equitable treatment of the appellant and the appellant's objections;
- c) Finding that new, substantive evidence has been introduced, and remanding the entire action to the consensus body or the secretariat for appropriate reconsideration.

Section 10.0 Normative American National Standards Policy

10.1 ANSI Patent Policy – Inclusion of Patents in American National Standards

The ASC has adopted the ANSI Patent Policy, as outlined in the *ANSI Essential Requirements*.

10.2 Commercial Terms and Conditions

The ASC has adopted the ANSI Commercial Terms and Conditions, as outlined in the *ANSI Essential Requirements*.

10.3 Metric Policy

Measurements will include metric conversions where American System values are mentioned in the standard. For example, "...50 pounds (223N)..."

10.4 Antitrust Policy

The ASC has adopted the Antitrust Policy, as outlined in the *ANSI Essential Requirements*.

10.5 Record Retention

All standards related records shall be prepared and retained to provide evidence of compliance with these procedures. Records shall be retained for one complete standards cycle, or until the standard is revised. Records concerning withdrawn standards shall be retained for at least five (5) years from the date of the withdrawal.

Section 11.0 Submittal of Standard

Upon completion of the procedures for voting, disposition of views and objections and appeals, the proposed standard shall be submitted to ANSI by the secretariat.

The information supplied to ANSI by the secretariat shall include all relevant material required by *ANSI Essential Requirements*. If the secretariat does not submit the proposal to ANSI within a reasonable period of time, any member(s) of the consensus body may make the submittal.

Once a new standard is published, the consensus body members, subgroup members, and secretariat shall dispose of all draft copies related to the previous cycle.

Section 12.0 Discontinuance of a Standards Project

The abandonment of processing a proposed new or revised American National Standard or portion thereof may be requested by the consensus body in writing to the secretariat. A written justification for such action shall be made to the secretariat within sixty (60) days of such request. The secretariat shall notify ANSI when a standards project is discontinued. Appeals of such actions shall be in accordance with section 9 herein referenced.

12.1 Administrative Withdrawal

An American National Standard shall be withdrawn five years following approval, if the standard has not been revised or reaffirmed, unless an extension has been granted by the ANSI Executive Standards Committee (ExSC) or its designee. An American National Standard that has not been reaffirmed or revised within the five-year period, and that has been recommended for withdrawal by the ExSC or its designee, shall be withdrawn at the close of a 30-day public review notice in *Standards Action*. American National Standards that have not been revised or reaffirmed within ten years from the date of their approval as American National Standards shall be withdrawn and such action shall be announced in *Standards Action*.

12.2 Withdrawal by ANSI-Accredited Standards Developer

An American National Standard must be supported by an ANSI-Accredited Standards Developer. If an accredited standards developer wishes to withdraw its approval of one or more of its American National Standards, it may do so without a vote of the relevant consensus body. If an accredited standards developer does withdraw one or more of its American National Standards,

then the standards developer shall notify ANSI immediately and the standard shall be withdrawn as an ANS and announced in *Standards Action*.

Section 13.0 Termination of ASC

A proposal to terminate an Accredited Standards Committee may be made by a directly and materially affected interest. The proposal shall be submitted in writing to the ASC and shall include at least the following:

- a) Reasons why the ASC should be terminated;
- b) The name(s) of the organization(s) that will assume responsibility for maintenance of any existing American National Standard(s) that is(are) the responsibility of the consensus body.

If it appears, that the desired objectives can best be reached by termination, the proposal and supporting documentation shall be submitted to the committee with a letter ballot to terminate the committee and transfer responsibility, as appropriate, for the affected standards. The proposal for termination of the ASC shall be announced for comment in *Standards Action*.

Section 14.0 Communications

All correspondence of ASC officers shall be on "ASC correspondence" letterhead.

14.1 Formal Internal Communication

If correspondence between subgroups or between working groups of different subgroups involves issues or decisions (i.e., non-routine matters) affecting other subgroups copies shall be sent to all affected subgroup chairs, the secretariat and the consensus body officers.

14.2 External Communication

Inquiries relating to the ASC shall be directed in writing to the secretariat, and members shall so inform individuals who raise such questions. All replies to inquiries shall be made through the secretariat in writing.

14.3 Requests for Interpretation of Standards

The consensus body will, in appropriate cases, render interpretations. However, no organizational member of the consensus body, or any individual member, or representative of a member, shall have the authority to issue an interpretation of an ASC A92 standard in the name of the consensus body, and no member, or representative of a member shall represent to any person that he has the approval of ASC A92 to issue such an interpretation.

- (1) Interpretations shall be requested in writing, and answered in writing. Requests for interpretations shall be addressed to the ASC A92 secretariat, who shall evaluate the need for an interpretation, with the advice of the Committee and subgroup chairs involved.
- (2) To facilitate issuing interpretations, each subgroup chair should organize an Interpretation Group consisting of no more than three knowledgeable subgroup members, plus himself, to provide prompt assistance in drafting interpretations.
- (3) Whenever it is decided that an interpretation is indicated, the secretariat shall contact the Interpretations Group of the subgroup(s) involved within ten (10) days.

- (4) The Interpretations Group should return a draft response within thirty (30) days of receipt of interpretation request. The draft reply shall be reviewed and approved by the ASC A92 Committee chair and subgroup chairpersons, before being incorporated in a formal reply. If the chair finds it advisable, he may have the draft circulated among additional consensus body members, subgroup members, or other relevant parties.
- (5) In general, a request for interpretation should be acknowledged within 30 days. The acknowledgement shall:
 - (a) Explain the elements of the interpretation procedure;
 - (b) Provide an estimate of the time required to provide a reply; which ordinarily should not exceed thirty (30) days;
 - (c) Convey that if more than 30 days will be required, that information will be sent to the inquirer within 5 days after the original acknowledgement.
- (6) Once agreement is reached concerning the interpretation, it shall be issued to the inquirer, all ASC A92 members, and all government bodies and organizations known to have adopted the interpreted standard. The cover letter shall include the acknowledgement that the interpretation is not equivalent to full ASC A92 consensus, and that in the event further questions are raised the interpretation may be reviewed and even radically changed at the consensus body level.
- (7) Rendering of interpretations shall in no way be used to supplant or weaken the normal A92 standards development activities.
- (8) Subgroups should review all interpretations during the drafting process.

Section 15.0 Parliamentary Procedures

On questions of parliamentary procedure not covered in these procedures, *Robert's Rules of Order* (latest edition) shall be used to expedite due process.