

in060080

DATE: January 16, 2006

FROM: Pat Morris, INCITS Executive Director

TO: ANSI Executive Standards Council

SUBJECT: Recommended Amendment to the ANSI Essential Requirements

Thank you for the opportunity to submit recommended amendments to the ANSI Essential Requirements. As suggested at the last ANSI NPC meeting, the ExSC is “always open to considering a specific procedural revision at a future meeting” and INCITS would like to submit the attached amendment for your consideration. The amendment would incorporate the language from the ISO/IEC JTC 1 Directives concerning “stabilized standards” into the ANSI Essential Requirements (before section 4.7.3), but only allow this practice for standards that are not required by regulation and do not fall under the category of health and safety standards.

In the report to the NPC in 2005 regarding the discussion of this issue previously, the chair raised a number of issues which are addressed specifically below (ExSC comments in **bold**):

- 1. A technical and timely review of the content of an ANS is one of the key hallmarks of the process. The ExSC questions how, in the absence of a technical review, the content is deemed viable over time.**

In the INCITS RD-2, section 5.2.7, Stabilized Standards, provides that “Whenever it is determined that a standard has ongoing validity and effectiveness, but is mature and unlikely to require maintenance of any sort, it can be designated as a stabilized standard, that removes the requirement for periodic reaffirmation.” This process requires that an explicit decision be made that the standard is in a stable area of technology, possibly obsolescent, but continues to have value for some users of IT. Procedure 5.2.7 requires that the Technical committee document the rationale for the recommendation and that any unresolved negative votes be documented; furthermore, the process requires a public review, just as a reaffirmation would.

- 2. Concern that should a legitimate proposal to revise a stabilized standard be submitted, the process seems to have the potential to not consider such a proposal as seriously as if the standard was not stabilized.**

The final sentence of 5.2.7, Stabilized Standards, requires: “If a new work proposal is generated and adopted against a stabilized standard, the standard will revert to maintenance status.”

- 3. Concern that such standards could be outdated, similar to outdated laws that remain on the books.**

This concern could be alleviated by restricting the stabilized standards process from being used for regulatory, safety, or other types of standards that could become outdated.

- 4. The ANSI Essential Requirements require that a revision/update of references within an ANS requires that the standard be processed as a revision and not a reaffirmation. Concern that this would not take place if the content of the standard is not specifically reviewed on a regular basis.**

This situation is not addressed by the RD-2; however, to preserve the interoperability and compatibility of stabilized standards, the references should remain unchanged. For example, if a media standard (e.g., 90mm diskettes) is stabilized for the purposes of having a definition suitable for equipment that handles archival media, users would expect that the standard must represent the technology that was preserved.

- 5. Concern that the introduction of the concept within the ANS process would result in additional classes of ANS documents and a diminution of the value of the ANS imprimatur.**

Note that ISO and IEC permit the use of this designation within JTC 1. Additionally, if the choice is only between stabilizing standards versus withdrawing standards, an additional class of documents will be created (withdrawn standards that now become SDO-specific standards) with the resulting loss of control and visibility for American National Standards.

- 6. Some noted that there would be a greater comfort level if the concept as described were not so open-ended, i.e., at some point a specific maintenance action is required.**

Especially in the field of information communications technology, there might be a greater level of comfort if users knew that certain legacy standards were stable. For example, INCITS most recent set of reaffirmations includes several examples of very stable standards. There are very few users of paper tape systems – and there might not be very many suppliers of paper tape. What happens if one of the suppliers goes out of business and the user needs to find an alternative source? They would probably want to cite INCITS 19:1974 [1974]. Is there any value to spending resources to determine if the standard should be revised? If INCITS withdrew a standard because somebody does not read Standards Action, we could be doing a disservice to some users and vendors.

Another prime example is INCITS 100:1989 [2000] Interface Between DTE & DCE for Packet Mode Operation with Packet Switch Data Communications Networks (CCITT X.25). The FAA still has some old systems using X.25, probably has interface standards that call out the INCITS 100 standard, and there are probably other old networks like this. Anybody wanting to invest in a better interface does not want an improved X.25

DTE/DCE interface. They just want to buy the appropriate connectors and interface boards. If they want something better, they will move to current technology – not an update of legacy technology.

Please let me know if there are questions or additional information that might be provided.

Attachment

INCITS-Suggested Amendment to the ANSI Essential Requirements

4.7.2 Continuous maintenance of American National Standards

Continuous maintenance is defined as the maintenance of a standard by consideration of recommended changes to any part of it according to a documented schedule for consideration and action by the consensus body.

The standard shall be maintained by an accredited standards developer. A documented program for periodic publication of revisions shall be established by the standards developer. Processing of these revisions shall be in accordance with these procedures. The published standard shall include a clear statement of the intent to consider requests for change and information on the submittal of such requests. Procedures shall be established for timely, documented consensus action on each request for change and no portion of the standard shall be excluded from the revision process. In the event that no revisions are issued for a period of four years, action to reaffirm or withdraw the standard shall be taken in accordance with the procedures contained herein.

4.7.3 Stabilized Standards

A stabilized standard is one that has ongoing validity and effectiveness but is mature and insofar as can be determined will not require further maintenance of any sort. While a standard is in stabilized status it will no longer be subject to periodic maintenance but will be retained to provide for the continued viability of existing products or servicing of equipment that is expected to have a long working life. Standards that are not eligible for stabilized status are those standards which are required by regulation, and standards that are safety or health related standards.

At least one five-year review cycle must pass after the last modification to an existing standard before it can be recommended for stabilization. Any accredited standards developer may recommend that a standard it owns be put in stabilized status as a result of any regular review of that standard. In each case the recommendation is accompanied by a statement of rationale and results in a letter ballot as is done in the case of a reaffirmation recommendation.

Once a standard is stabilized it will be recorded on a master list of stabilized standards kept by the accredited standards developer and available to ANSI. This record will include the date of first addition to the list and the rationale provided as above.

Where an accredited standards developer becomes aware that a stabilized standard is no longer in use or its use has been superseded or it now unsafe to continue to use the standard, ANSI or any other accredited standards developer may request the owning accredited standards developer to issue an immediate 30 day letter ballot to reclassify the standard as withdrawn.

If a new work proposal is generated and adopted against a stabilized standard, the standard is automatically removed by the accredited standards developer from the list of stabilized standards. A new work proposal against a stabilized standard must explicitly note that the standard is stabilized and that the effect of adoption of the new work proposal will be to return the standard to active status. To be eligible once again for stabilization the standard must go through the same process as it did initially, including no modification for at least one five year maintenance cycle.

The owning accredited standards developer may act to remove a standard from stabilized status at any time and it may request a 30 day letter ballot to reinstate the standard as current.

~~4.7.3~~ 4.7.4 Withdrawal of American National Standards that are not maintained

If any extension is denied, the ExSC or its designee shall inform the standards developer of the reasons for the denial. If the standards developer fails to comply with the maintenance requirements defined in these procedures, the ExSC or its designee shall recommend withdrawal of approval of the American National Standard to the Board of Standards Review.

If the standards developer publishes any revision of an American National Standard and does not submit the revision for approval as an American National Standard, the BSR shall consider withdrawal of approval of the existing American National Standard.

Notice of intent to withdraw approval as an American National Standard shall be published in *Standards Action* and shall include the reason for withdrawal.