

**Accredited Standards
Committee Z136
for the Safe Use of Lasers**



**Procedures for the
Development of
Z136 American National
Standards**

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Accredited Standards Committee Z136 for the Safe Use of Lasers Procedures for the Development of Z136 American National Standards

1. General

These procedures for the Accredited Standards Committee (ASC) Z136 meet the requirements for due process and development of consensus for approval of American National Standards as given in Clause 1 of the *ANSI Essential Requirements: Due process requirements for American National Standards*. Where these *Procedures for the Development of Z136 American National Standards* are silent on an issue, the *ANSI Essential Requirements* shall serve as the precedent document.

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

2. ASC Z136

ASC Z136 shall consist of the Secretariat, Administrative Committee (ADCOM), and Consensus Body members (the Committee¹). The scope of the Committee is to protect against hazards associated with the use of lasers and optically radiating diodes. In accordance with *ANSI Essential Requirements* for a consensus body dealing with safety related standards, the composition of the Committee shall be sufficiently diverse to ensure that no single interest category constitutes more than one-third of the membership. Care shall be taken to ensure all interest categories are represented to the extent possible.

3. The Secretariat

The Laser Institute of America shall be the Secretariat for ASC Z136. The Secretariat shall be responsible for the following:

- (a) Applying for ASC accreditation by ANSI and maintaining accreditation in accordance with ANSI requirements, including submission of the Committee roster
- (b) Overseeing the Committee's compliance with these procedures
- (c) Appointing a Chair and Vice-Chair (subject to confirmation by the Committee) and re-appointing the Chair and Vice-Chair on an annual basis
- (d) Appointing a Committee Secretary to perform administrative work including secretarial services, e.g., 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; and reappointing the Committee Secretary on an annual basis
- (e) Providing the Administrative Secretary to assist the Committee Secretary as necessary
- (f) Maintaining a roster of the Committee and a list of standards for which the Committee is responsible
- (g) Submitting candidate standards approved by the Committee, with supporting documentation (PINS, BSR-8, BSR-9, BSR-11), for ANSI review and approval as American National Standards

¹ For the purpose of these procedures, the term "the Committee" refers to the Consensus Body members, i.e., the main Committee.

- (h) Recording and acknowledging requests for interpretations of standards developed by the Committee and submitting such requests to the Committee Secretary for appropriate action, in accordance with Clause 9.2.1
- (i) Recording and acknowledging requests for appeals of standards developed by the Committee, scheduling appeals hearings, reviewing requests for re-hearings and deciding whether to adopt the report of the appeals panel or schedule a re-hearing.
- (j) Selecting, subject to ratification by the Committee, six to nine members of the Committee to serve as the appeals pool
- (k) Reviewing membership annually with respect to the criteria of Clause 5.3
- (l) Performing other administrative functions as required by these procedures

4. The Administrative Committee

The Administrative Committee (ADCOM) shall consist of the Committee Chair, Vice-Chair, Past Chair, Committee Secretary, the Administrative Secretary, a representative of the Secretariat, and one or more members at large from the Committee. The member(s) at large will be appointed by the Secretariat upon the recommendation of the ADCOM, and is (are) subject to reappointment on an annual basis. The ADCOM shall be responsible for directing the activities of the Committee and its subgroups, which includes the following:

- (a) Organizing the Committee
- (b) Developing and maintaining Committee policies and procedures
- (c) Appointing chairs to subgroups created by the ADCOM
- (d) Reviewing *Subcommittee Project Initiation Requests* (Appendix B)
- (e) Effecting and reviewing responses to requests for bona-fide interpretations (see Clause 9.2.1) prior to forwarding them to the requestor
- (f) Reviewing all applications for Committee membership
- (g) Recommending action by the Committee on all applications for new members
- (h) Recommending action by the Committee on nominations for Members Emeriti
- (i) Recommending removal of members of the Committee for inactivity or other reasons
- (j) Interacting with ANSI on general matters such as publication, policy and procedure

5. The Committee

5.1 Officers

There shall be a Chair and Vice-Chair appointed by the Secretariat from the individual members or representatives of the Committee and confirmed by majority vote of the Committee. Each officer may be reappointed annually by the Secretariat for a maximum of five years. The Vice-Chair shall carry out the Chair's duties if the Chair is temporarily unable to do so. The Committee Secretary shall be appointed by the Secretariat. The Committee Secretary shall record and publish minutes of each meeting of the Committee and the ADCOM.

5.2 Responsibilities

The Committee shall be responsible for the following:

- (a) Proposing American National Standards² within its scope
- (b) Voting on approval of proposed standards within its scope
- (c) Voting on revisions and reaffirmations of standards
- (d) Maintaining the standards approved by the Committee in accordance with ANSI procedures
- (e) Acting on other matters requiring Committee action as provided in these procedures
- (f) Coordinating with other standards developing organizations
- (g) Protecting against actions taken in the name of the Committee without Committee authorization
- (h) Voting on ADCOM recommendations (as required by these procedures)

5.3 Membership

The membership of the Committee shall consist of individuals that may or may not represent organizations³. These individuals shall have a direct and material interest in the activities of ASC Z136. The selection and addition of members, along with their interest category (see Clause 5.3.4), shall be subject to approval by a majority vote of the Committee after the application has been processed by the ADCOM in accordance with Clause 5.3.1. The termination of members shall be subject to approval by majority vote of the Committee after a review of the membership in accordance with Clause 5.3.2.

5.3.1 Membership Application

A request for membership on the Committee shall be addressed to the Secretariat, shall indicate the applicant's direct and material interest in the ASC's work, qualifications and willingness to participate actively. In addition, if the applicant is representing an organization, an alternate representative (subject to confirmation by the Committee) may be identified by that organization.

5.3.1.1 Recommendation

In recommending appropriate action to the Committee on all applications for membership, the ADCOM shall consider the:

- (a) Need for active participation by each interest category
- (b) Potential for dominance by a single interest category or representative organization
- (c) Extent of the applicant's willingness and ability to actively participate
- (d) The material interest and credentials of the applicant

5.3.2 Review of Membership

The Secretariat shall review the Committee membership list annually with respect to the criteria of Clause 5.3. Members are expected to fulfill obligations of active participation, e.g., meeting attendance, responding to ballots, and subcommittee activity. Where a member is found in habitual default of his/her obligations, the Secretariat shall direct the matter to the ADCOM for recommendation of appropriate action to the Committee, which may include termination of membership.

² For the purpose of these procedures, the term "standards" includes standards, recommended practices and guides.

³ For the purpose of these procedures, the term "organizations" includes organizations, companies, government entities, educational institutions, etc.

5.3.3 Members Emeriti, Observers and Invited Experts

Anyone with long and distinguished service in support of ASC Z136 standards may be nominated as a “Member Emeritus.” Membership includes lifetime membership in ASC Z136, recognition in the front matter of ASC Z136 standards, and all privileges as an ASC Z136 member with the exception of voting on Committee matters and standards.

Individuals and organizations having an interest in the Committee’s work may attend meetings as observers. Observers may submit comments for consideration, but shall have no vote.

The Committee may invite experts to assist it. These experts should possess special knowledge in a technical or administrative area of interest to the Committee. A request for appointment of an invited expert may come from any Committee member. Invited experts shall serve for a specified period of time as determined by the ADCOM. Invited experts shall be advised of the Committee’s activities, may attend meetings, and may submit comments for consideration, but shall have no vote.

5.3.4 Interest Categories

All appropriate interests that are directly and materially affected by the standards activity of the Committee shall have the opportunity for fair and equitable participation without dominance by any single interest or organization. Each member shall specify his/her own interest category as appropriate from the following established list:

- | | |
|------------------------------------|---------------------------------|
| (a) Academia | (i) Health Care |
| (b) Consultant | (j) Industrial/Commerce |
| (c) Consumer/Consumer Organization | (k) Manufacturer |
| (d) Department of Defense (DoD) | (l) Professional Society |
| (e) Directly Affected Public | (m) Regulatory Agency |
| (f) Distributor/Retailer | (n) Testing Laboratory/Facility |
| (g) Government (non-DoD) | (o) Trade Association |
| (h) Government Contractor | |

A vote of the Committee shall be required to add or change (revise) interest categories, the rationale for which shall be included in the Committee ballot.

5.3.5 Membership Roster

The Secretariat shall be responsible for maintaining the Committee roster. The Committee roster shall be available on the official Z136 web site (www.z136.org) for download by all members of the Committee and shall include the person’s name, interest category and name of organization represented (as applicable) for the following:

- (a) Secretariat’s Representative
- (b) Committee Officers
- (c) Members and Alternate Members
- (d) Members Emeriti
- (e) Invited Experts

5.4 Meetings

Committee meetings shall be held, as decided upon by the Committee, the Chair, the Secretariat, or by petition of five or more members of the Committee. Such meetings are 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.

5.4.1 Open Meetings

Meetings of the Committee shall be open to all members and others having a direct and material interest. A minimum of 30 days notice of regularly scheduled meetings of the Committee shall be provided for appropriate public notice, e.g., *ANSI Standards Action*, *LIA Today*, www.z136.org. 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 with the meeting notice to members and to others expressing interest.

5.4.2 Quorum

A majority of the members of the Committee 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 vote at a future meeting or by ballot. However, an absent Committee member may request in writing⁴ to have a proxy assigned to any Committee member present at a meeting. Written proxy shall be included in determining a quorum, provided the agenda and action items have been forwarded to the Committee at least thirty (30) days prior to the meeting.

6. Subgroups Created by the Committee

The Committee may create one or more subgroups (subcommittees, working groups, writing groups, etc.) to expedite the work of the Committee. The formation of standards subcommittees requires approval by a majority vote of the Committee and appropriate public notice e.g., *ANSI Standards Action*, *LIA Today*, or www.z136.org.

The scope and duties delegated to the subgroup shall be approved at the time it is formed. Subsequent changes in scope or duties, or the merger of two subgroups, or the disbandment of the subgroup shall also require approval by the Committee. Meetings of subgroups may be held as decided upon by the members or chair of the subgroup.

6.1 Subcommittees

6.1.1 Organization of the Subcommittees

Each subcommittee shall consist of a chair, vice-chair, secretary and its members. The Chair shall be appointed by the ADCOM (subject to confirmation by the Committee), and shall be responsible for keeping the Committee informed of progress relative to its activities. The Vice-Chair and Secretary shall be appointed by the Subcommittee Chair; the Chair or Vice-Chair can also serve as the Secretary of the subcommittee. The Secretary shall be responsible for ensuring the accuracy of the subcommittee roster⁵ and for generating the minutes of all subcommittee meetings. Each subcommittee shall have a title and scope that have been approved by the Committee.

Rules for membership on a subcommittee are at the discretion of the Subcommittee Chair. The Subcommittee Chair shall ensure that subcommittee membership is sufficiently diverse and achieves reasonable balance without dominance by a single interest group. The Chair of a

⁴ For the purpose of these procedures, the term “in writing” refers to paper or electronic media.

⁵ Subcommittee rosters should include similar information to that of the Committee roster (see Clause 5.3.5).

subcommittee is required to be a member of the Committee. The Vice-Chair of a subcommittee is encouraged be a member of the Committee.

6.1.2 Subcommittee Core Requirements

- (a) Subcommittee membership is open to individuals with a material interest in the topic and within the requirements established by these procedures
- (b) Subcommittee membership shall conform to a reasonable standard of balance among the various interests represented on the subcommittee; this shall be ensured by the Subcommittee Chair and communicated to the Secretariat annually
- (c) Subcommittee activities shall meet all deadlines established for the timely development and publication of standards
- (d) Continued subcommittee membership is dependent upon active participation in subcommittee activities

6.1.3 Terms of Office

The term of office for a chair of a standards subcommittee is intended to extend through the development cycle of the standard for which it is responsible. The term of office for a chair of a technical subcommittee is normally not expected to exceed 10 years.

Subcommittee chair reappointment shall be reviewed annually by the ADCOM. Reappointment of subcommittee chairs is subject to confirmation by the Committee.

6.1.4 Standards Subcommittees

Each standards subcommittee (SSC) is responsible for a specific standard or series of vertical standards. The following is the list of standards subcommittees current at the time of publication of these procedures:

- SSC-1: Safe Use of Lasers
- SSC-2: Safe Use of Lasers and LEDs in Telecommunications Applications
- SSC-3: Safe Use of Lasers in Health Care Facilities
- SSC-4: Measurements and Instrumentation
- SSC-5: Safe Use of Lasers in Educational Institutions
- SSC-6: Safe Use of Lasers Outdoors
- SSC-7: Eyewear and Protective Barriers
- SSC-8: Safe Use of Lasers in Research, Development and Testing
- SSC-9: Safe Use of Lasers in Manufacturing Environments
- SSC-10: Safe Use of Lasers in Entertainment, Displays and Exhibitions

Additional standards subcommittees shall be established as required.

6.1.4.1 Responsibilities

Each SSC shall be responsible for the following:

- (a) Developing and maintaining Z136 standards within the scope of the subcommittee through the consensus process

- (b) Coordinating with technical subcommittees and with other standards developing organizations as appropriate
- (c) Voting on approval of Subcommittee Drafts for Vote (SCDV) for Z136 standards within its scope
- (d) Providing Ballot Summaries and Summary Comment Forms (Appendix D) to the Secretariat
- (e) Maintaining the standards developed by the subcommittee in accordance with these and ANSI procedures
- (f) Responding to requests for interpretation and forwarding response to the ADCOM in a timely manner
- (g) Acting on other matters requiring subcommittee action as provided in these procedures
- (h) Reporting annually to the Committee
- (i) Communicating with the Committee on specific subcommittee activities as needed

6.1.5 Technical Subcommittees

Each technical subcommittee (TSC) is comprised of individuals whose expertise overlaps the scope of one or more of the standards subcommittees. The following is the list of technical subcommittees current at the time of publication of these procedures:

TSC-1: Biological Effects and Medical Surveillance

TSC-2: Hazard Evaluation and Classification

TSC-4: Control Measures & Training

TSC-5: Non-Beam Hazards

TSC-7: Analysis and Applications

Additional technical subcommittees shall be established as required.

6.1.5.1 Responsibilities

Each TSC shall be responsible for the following:

- (a) Coordinating with SSCs and with other standards developing organizations as appropriate
- (b) Providing information within the scope of the TSC as necessary to SSCs to expedite the creation of Z136 standards
- (c) Responding to requests for interpretations and forwarding response to the ADCOM in a timely manner
- (d) Acting on other matters requiring subcommittee action as provided in these procedures
- (e) Reporting annually to the Committee
- (f) Communicating with the Committee on specific subcommittee activities as needed

6.2 Editorial Working Group

The Editorial Working Group (EWG) shall consist of a chair, the Committee Secretary, a representative of the Secretariat, a terminology coordinator, and one or more members at large (e.g., a designee from the sponsor SSC). The Chair shall be appointed by the ADCOM (subject to confirmation by the Committee), and shall be responsible for keeping the Committee informed of progress relative to its activities.

6.2.1 Responsibilities

The overall responsibility of the EWG is to review drafts for consistency, style and consistent use of terminology. The EWG shall be responsible for the following:

- (a) Reviewing the Subcommittee Draft for Vote (SCDV) after approval by the subcommittee balloting group and prior to ballot by the Committee
- (b) Reviewing the Committee Draft for Vote (CDV) one final time for style and consistency
- (c) Effecting the review of the galley proof of each printing of each standard

7. Balloting

Ballots are used to determine consensus from the Committee or any of its subgroups. The primary method of balloting should be electronic; however, voice or paper ballots are permitted except for balloting draft standards, i.e., SCDVs and CDVs. (See 7.6 for specific requirements for balloting draft standards via the balloting group method.) [A] Committee ballot may be authorized by any of the following:

- (a) Majority vote of those present at a Committee meeting
- (b) The Committee Chair
- (c) The ADCOM
- (d) The Secretariat
- (e) Petition of five or more members of the Committee

7.1 Default Balloting

A default ballot is a ballot that requires no action on the part of the balloter when in agreement with the ballot or when the balloter does not wish to change his/her vote on a recirculation ballot. Default ballots should be used when recirculating a ballot on a proposed American National Standard to inform the balloting group of the following: 1) each unresolved negative comment, 2) how each resolved negative comment was addressed, and 3) each substantive change made to a proposed American National Standard resulting from ballot resolution. During ballot recirculation, a balloter can only change his/her vote based on the *changed* portions of the proposed standard, or on the unresolved negative comments. A balloter cannot change his/her vote based on a clause previously seen and approved, unless that clause is affected by the new material. If a member of the balloting group does not plan to change his/her vote on a default recirculation ballot, it is not necessary to return the ballot. In this case, the vote will be counted as in the original ballot. This applies to both affirmative and negative votes. The voting period for a default ballot shall be at least two weeks. The following votes may be cast on a default ballot:

- (a) Affirmative
- (b) Negative
- (c) Abstain

7.2 Balloting Period

A timeline shall be established for all ballots. Prior to the close of ballot, a follow-up communication requesting immediate return of the ballot shall be sent, as appropriate, to members and alternate members whose votes have not been received.

7.3 Alternate Balloting

The vote of an alternate representative on the Committee is counted only if the principal representative fails to vote or fails to join the balloting group, as discussed in Clause 7.6.

7.4 Single Vote

Generally, no representative will have more than one vote. However, if two or more organizations appoint the same individual as their representative, that individual may cast a separate vote for each organization represented. The organizations shall confirm in writing to the Secretariat that they are aware of and will accept the results. Additionally, representation of more than one organization by the same individual shall require approval by the majority of the Committee, excluding the vote of that individual. When an individual represents more than one organization, the individual shall be counted equally as many times in the membership count to ensure balance of interests as stated in Clause 2.

7.5 Proxy Vote

To facilitate a quorum during Committee meetings, an absent member may request in writing to the Secretariat to have a proxy assigned to any Committee member present at the meeting, provided the agenda and action items have been forwarded to the Committee at least thirty (30) days prior to the meeting. A member serving as a proxy must exercise his or her judgment as to the viability of instruction from the assigner when announced agenda items are amended or developed through the meeting process. Members serving as proxies may only vote on approved agenda items announced through the agenda distributed prior to the meeting. Proxy voting is allowed only for those voting members who cannot attend the entire meeting; proxies may not be assigned for parts of meetings. The Chair shall announce any proxy voting to the Committee members at the start of the period in which the proxy is to be in effect.

7.6 Balloting Groups

Balloting groups (BGs) are used solely for SCDVs and CDVs (including amendments and corrigenda). Balloting groups shall be established at the time of balloting on new or revised standards and their reaffirmation, amendments and corrigenda (see 7.9). Each member or alternate member of the sponsoring SSC (for SCDVs) or the Committee (for CDVs) eligible to vote shall be invited to participate on a balloting group (see Appendix C). The SCDV shall be made available for comments to the coordinating TSCs named on the Subcommittee Project Initiation Report (SPIR), see Appendix B. The comments from the TSC do not constitute a vote, but all comments received shall be considered.

Members who join a balloting group are expected to have interest in and commitment to reviewing and voting on a specific proposed standard. The balloting group for the CDV shall provide for the development of consensus by all interests significantly affected by the scope of the standard. This is achieved through a balance of such interests in the balloting group membership. Committee and subcommittee members who accept the invitation to ballot on specific issues are required to return ballots by the date due. For a ballot to be valid, 75% of the balloting group must return a vote.

The voting period for ballots on standards should end no sooner than four weeks from the date of ballot issue or as soon as all ballots are returned, whichever comes earlier. Under extenuating circumstances, the ADCOM can grant an (one) extension at the request of the chair initiating the ballot.

7.7 Types of Ballot

7.7.1 Document or Procedure Ballot

The following votes may be cast on a document or procedure ballot:

- (a) Affirmative
- (b) Affirmative (with suggested revisions and comments)
- (c) Negative, with reasons (specific wording or actions shall be provided that would resolve the objection)
- (d) Abstain, with reasons

7.7.2 Membership or Officer Ballot

The voting period for membership or officer ballots (excluding voice votes) shall not be less than two weeks. The following votes may be cast on a membership or officer ballot:

- (a) Yes
- (b) No
- (c) Abstain

7.8 Committee (Consensus Body) Ballots

7.8.1 Actions Requiring Approval by a Majority of the Votes

The following actions require approval by a majority of the membership of the Committee either at a meeting or by electronic ballot:

- (a) Confirmation of officers appointed by the Secretariat
- (b) Confirmation of subcommittee chairs appointed by the ADCOM
- (c) Formation or change of a subgroup (e.g., subcommittee), including its existence, scope, duties, or structure
- (d) Addition of new Committee members
- (e) Removal of Committee members in accordance with Clause 5.3.2

7.8.2 Actions Requiring Approval by Two-Thirds of the Votes

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

- (a) Adoption of ASC procedures, categories of interest, or revisions⁶ thereof
- (b) Approval for submission to ANSI of change of ASC scope
- (c) Approval of new projects
- (d) Withdrawal of an existing standard

When recorded votes are taken at meetings, members who are absent shall be given the opportunity to vote before (absentee ballot) or within 30 calendar days following the meeting.

⁶ Any changes made to ASC Z136 procedures at the direction of ANSI, i.e., any change (incorporation or deletion) made to come into compliance with *ANSI Essential Requirements* shall be performed by the ADCOM and shall not require Committee ballot.

7.9 Standards (Balloting Group) Ballots

Balloting Groups shall be required for approval of SCDVs and CDVs on draft standards, recommended practices and guides including revisions, amendments and corrigenda. Ballots shall be conducted in accordance with the following requirements:

- (a) Three quarters (75%) of the ballots shall be returned (including abstentions) from those in the Balloting Group in order for the ballot to be valid
- (b) Two thirds affirmative votes of the ballots returned (following ballot resolution) shall be required (excluding abstentions) for approval
- (c) Attempts shall be made to reconcile all negative ballots
- (d) Each unresolved objection and attempt at resolution, and any substantive change made in a proposed American National Standard shall be circulated to the entire balloting group to allow each member to confirm or change their vote or to comment. This reballoting should be done by default electronic ballot (see 7.1 Default Balloting). Concurrently, the modified SCDV or CDV (including amendments and corrigenda) shall be made available to balloting group members to afford each the opportunity to review the document, in its entirety.
- (e) All comments associated with affirmative votes shall be considered

7.10 Disposition of Views and Objections – Committee

Prompt consideration shall be given to the expressed views and objections of all participants. Any person with an unresolved objection resulting from the balloting process has the right to appeal in accordance with the procedures outlined in Clause 10. Each objector shall be advised in writing of the disposition of the objection and the reasons. If resolution is not achieved, the Secretariat shall inform the objector in writing of the appeals process.

Unresolved objections and any substantive change made in a proposed American National Standard shall be reported to the established balloting group in order to afford each an opportunity to respond, reaffirm or change their vote (see 7.1 Default Balloting). If comments not related to the proposal are submitted with a vote (negative or affirmative), the comments shall be documented and considered in the same manner as submittal of a new proposal.

8. ANSI Requirements

8.1 ANSI Coordination – Initiation of a Project

At the initiation of a project to develop or revise an American National Standard, notification shall be transmitted to ANSI using the Project Initiation Notification System (PINS) form, or its equivalent, for listing in *Standards Action*. A PINS form may be submitted, but is not required, at the initiation of a project to reaffirm or withdraw an American National Standard. A statement shall be submitted and published as part of the PINS announcement that shall include:

- (a) An explanation of the need for the project; and
- (b) Identification of the stakeholders (e.g., telecom, consumer, medical, environmental, etc.) likely to be directly impacted by the standard.

If the Secretariat receives written comments (including electronic communications) within 30 days from the publication date of a PINS announcement in *Standards Action*, and those comments assert that a proposed standard duplicates or conflicts with an existing American National Standard (ANS) or candidate ANS that has been announced previously in *Standards Action*, a mandatory deliberation of representatives from the relevant stakeholder groups shall be held within 90 days from the comment deadline. Such a deliberation shall be organized by the

standards developer and the commenter and shall be concluded before the standards developer may submit a draft standard for public review. If the deliberation does not take place within the 90-day period and the standards developer can demonstrate that it has made a good faith effort to schedule and otherwise organize it, then the standards developer will be excused from compliance with this requirement. The purpose of the deliberation is to provide the relevant stakeholders with an opportunity to discuss whether there is a compelling need for the proposed standards project. The outcome of such a deliberation shall be conveyed in writing by the standards developer and commenter (ideally as a joint submission) to the Board of Standards Review (BSR) for consideration should the standards developer ultimately submit the related candidate standard to ANSI for approval. Comments received in connection with a PINS announcement shall be handled in accordance with Clause 8.2 herein.

8.2 Opportunity for Public Review

8.2.1 Listing in *Standards Action*

Proposals for new American National Standards or reaffirmation, revision, or withdrawal of existing ones shall be transmitted to ANSI using the BSR-8 form, or its equivalent, for listing in *Standards Action* in order to provide an opportunity for public comment.

The Secretariat shall determine whether listing of proposed standards actions shall be concurrent with the final Committee letter ballot and whether announcement in other suitable media is appropriate. Any substantive change subsequently made in a proposed American National Standard requires listing of the change in *Standards Action*.

8.2.2 Disposition of Views and Objections – Public Review

Prompt consideration shall be given to the expressed views and objections of all participants, including those commenting on the listing in *Standards Action*.

Upon receipt of an objection from public review of a standard, each objector shall be advised in writing of the disposition of the objection and the reasons. If resolution is not achieved, the Secretariat shall inform the objector in writing of the appeals process, see Clause 10.

Unresolved objections and any substantive change made in a proposed American National Standard as a result of a comment received from public review shall be reported to the established balloting group in order to afford balloting group members an opportunity to respond, reaffirm or change their vote (see 7.1 Default Balloting).

8.3 Report of Final Result

The final result of all Committee ballots shall be reported, by interest categories, to the Committee.

8.4 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 the required criteria as listed in *ANSI Essential Requirements' Criteria for Approval of an American National Standard*.

If the Secretariat does not submit the proposal to ANSI within a reasonable period of time, any member(s) of the Committee may make the submittal.

8.5 Termination of the Committee

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

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

If it appears, after review by ANSI and discussion among the proponent of the action, the Secretariat, and the ADCOM or its designee, 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 Committee shall be announced for comment in *Standards Action*.

8.6 Patent Policy

If the use of an essential patent claim (one whose use would be required for compliance with a proposed or approved American National Standard) is required due to technical reasons that justify this approach, the procedures in this clause shall be followed.

8.6.1 Statement from Patent Holder

Prior to the use of such essential patent claim(s), the identified party or patent holder shall provide to ASC Z136 either:

- (a) assurance in the form of a general disclaimer to the effect that such party does not hold and does not currently intend holding any essential patent claim(s); or
- (b) assurance that a license to such essential patent claim(s) will be made available to applicants desiring to utilize the license for the purpose of implementing the standard either:
 - i) under reasonable terms and conditions that are demonstrably free of any unfair discrimination; or
 - ii) without compensation and under reasonable terms and conditions that are demonstrably free of any unfair discrimination.

8.6.2 Record of Statement

A record of the patent holder's statement shall be retained in the Secretariat's and ANSI's files.

8.6.3 Notice

When ASC Z136 receives the assurance set forth in 8.6.1 above from the patent holder, the standard shall include a note substantially as follows:

NOTE – The user's attention is called to the possibility that compliance with this standard may require use of an invention covered by patent rights.

By publication of this standard, no position is taken with respect to the validity of any such claim(s) or of any patent rights in connection therewith. If a patent holder has filed a statement of willingness to grant a license under these rights on reasonable and nondiscriminatory terms and conditions to applicants desiring to obtain such a license, then details may be obtained from the standards developer.

8.6.4 Responsibility for Identifying Patents

Neither ASC Z136 nor ANSI is responsible for identifying patents for which a license may be required by an American National Standard or for conducting inquiries into the legal validity or scope of those patents that are brought to their attention.

8.7 Metric Policy

Units of the International System of Units (SI), the modernized metric system, are the preferred units of measurement in the Z136 series of laser safety standards.

8.8 Commercial Terms and Conditions

Provisions involving business relations between buyer and seller such as guarantees, warranties, and other commercial terms and conditions shall not be included in an American National Standard. The appearance that a standard endorses any particular products, services or companies must be avoided. Therefore, it generally is not acceptable to include manufacturer lists, service provider lists, or similar material in the text of a standard or in an annex (or the equivalent). Where a sole source exists for essential equipment, materials or services necessary to comply with or to determine compliance with the standard, it is permissible to supply the name and address of the source in a footnote or informative annex as long as the words “or the equivalent” are added to the reference. In connection with standards that relate to the determination of whether products or services conform to one or more standards, the process or criteria for determining conformity can be standardized as long as the description of the process or criteria is limited to technical and engineering concerns and does not include what would otherwise be a commercial term.

8.9 Record Retention

Records shall be retained by the Committee Secretary and the Secretariat for one complete standards cycle or until the standard is revised, in accordance with *ANSI Essential Requirements*.

Records concerning withdrawals of all American National Standards shall be retained for at least five years from the date of withdrawal or for a duration consistent with the audit schedule.

9. Formal Communications

9.1 Internal Communication

If correspondence between subcommittees or between working groups of different subcommittees involves issues or decisions (i.e., non-routine matters) affecting other subcommittees, copies shall be sent to all affected Subcommittee chairs, and all ADCOM members. An archive of all formal internal communications shall be maintained by the Secretariat.

9.2 External Communication

Inquiries relating to the Committee should be directed to the Secretariat and members should so inform individuals who raise such questions. All replies to inquiries shall be made through the Secretariat.

9.2.1 Explanations and Interpretations of Standards

The Committee Secretary and ADCOM Chair shall serve as the Committee designees for receipt of requests for explanations and interpretations submitted in writing to the Secretariat and shall be responsible for determining the adjudged nature of the request (see Appendix F).

9.2.1.1 Explanations

An “explanation” relates to a simple clarification of a portion of a standard as it is written, e.g., a clarification of a definition, a simple request for assistance in calculations based on tabular material. An explanation does not address the *implication* or *intent* of a portion of the standard.

Requests judged to be “for explanation only” are directed to an appropriate member of the Committee or its subcommittees for the formal response. This response is then directed to the Secretariat (with copies to the ADCOM Chair and Committee Secretary). The Secretariat shall provide the formal explanation to the requestor. Documentation of explanations is not required.

9.2.1.2 Interpretations

An “interpretation” relates to the *implication* or *intent* of a portion of a standard as it applies to a specific application, i.e., it is a unique form of commentary on a standard; it can only discuss, address, and clarify what the standard currently says. It is not an explanation of what the standard should have said and *cannot* change the meaning of a standard as it currently exists. Even if the request points out an error in the standard, the interpretation cannot fix that error.

Written inquiries judged to be bona-fide interpretations shall be forwarded to the Chair of the appropriate subcommittee for processing. The Subcommittee Chair shall obtain concurrence by two-thirds affirmative vote from their associated subcommittee for the response. This response, along with balloting results, is then submitted to the Secretariat (with copies to the ADCOM Chair and Committee Secretary). The Secretariat shall provide the formal interpretation to the requestor and document the process as required by these procedures.

Revisions to the standard resulting from requests for interpretations shall be processed in accordance with the procedures of the Committee and ANSI.

10. Appeals

Persons who have directly and materially affected interests and who have been or may be adversely affected by a substantive procedural action or inaction of the Committee or the Secretariat shall have the right to appeal. An appeal is limited to procedural issues and shall not consider technical issues.

10.1 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 that are 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.

10.2 Response to complaint

Within ten days after receipt of the complaint, the Secretariat shall send the appellant a written acknowledgment of receipt of the complaint, and shall send the respondent (the Chair of the SSC at issue) a copy of the complaint. Within 45 days of the receipt of the written acknowledgement of the complaint, the respondent shall respond in writing (reply brief) to the appellant and to the Secretariat, specifically addressing each allegation of fact in the complaint to the extent of the respondent’s knowledge. The respondent shall include complete documentation supporting all statements contained in the reply brief.

10.3 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. A meeting notice, which identifies the appeals panel, will be sent to the appellant.

10.4 Appeals Panel

At the annual meeting of the Committee, the Secretariat shall select, subject to ratification by the Committee, six to nine members of the Committee to serve as the appeals pool. 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. If the parties to the appeal cannot agree on an appeals panel within six weeks, the Secretariat shall appoint an independent arbitrator who in turn shall appoint the appeals panel.

10.5 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 Committee and the Secretariat took all actions in compliance with these procedures and that the requested remedial action would be ineffective or detrimental. The respondent and appellant shall be limited to three members each and only those designated members may address or be addressed by the appeals panel. Each party shall be given equal time to present its case and a rebuttal. All discussions shall be between the appeals panel members and the respondent or appellant, but not between the respondent and appellant. Each party may adduce other pertinent arguments. Members of the appeals panel may address questions to the appellant, respondent, or individuals representing the appellant or respondent. *Robert's Rules of Order* (latest edition) shall apply to questions of parliamentary procedure for the hearing not covered herein.

For consistency and fairness to all parties concerned with the appeal process the appeals panel should follow a set of pre-defined and documented steps, which include introductory statements, time limits, order of participation, and other details necessary to conduct an appeal.

10.6 Decision

The appeals panel shall render its decision in writing within thirty days of the hearing, 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 Committee 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 Committee or the Secretariat for appropriate reconsideration.

APPENDIX A

Normative

A.1 Outline for the Preparation of Draft Standards and Balloting (Subcommittee Level)

(See Flowcharts A.1 and A.2)

- (a) To initiate work on a concept for a new document the stakeholders shall submit the need, scope, and summary to the ADCOM for approval of the project. The Secretariat, with the approval of the ADCOM, shall prepare and conduct a ballot (see Clause 7.8.2) for approval by the Committee of the project and for establishing a new standards subcommittee (if necessary) to complete the work. Upon approval, the Secretariat shall submit a Project Initiation Notification System (PINS) form to ANSI. See Flowchart A.1.
- (b) To initiate work on an existing document (revision), the Secretariat shall submit a PINS form to ANSI following publication of the existing document but prior to subcommittee activity.
- (c) The SSC Chair shall submit a completed *Subcommittee Project Initiation Request* (SPIR – see Appendix B) through the Secretariat to the ADCOM. A proposed draft or, *at a minimum*, an outline shall be included. If the SPIR is determined by the ADCOM to be incomplete, the Secretariat shall return the SPIR to the SSC Chair for completion.
- (d) The Secretariat shall distribute a copy of the completed SPIR to each subcommittee chair to ensure that all subcommittees having material interest are included in the coordination process.
- (e) The SSC should immediately begin completing a Subcommittee Draft (SCD) to ensure expeditious release of new documents. See Flowchart A.2.
- (f) During development, the secretary of the SSC shall distribute each successive SCD to the members of the SSC and to the Secretariat.
- (g) The Secretariat shall circulate each successive SCD to the chair of each technical subcommittee identified on the SPIR with a timeline for comments to be considered. Each draft should be identified as an SCD with a draft number and date on each page.
- (h) When an SCD is ready for subcommittee ballot, the chair of the SSC shall establish a balloting group from the SSC membership and shall submit a Subcommittee Draft for Vote (SCDV) to the Secretariat. The Secretariat shall distribute the SCDV to the chair of each of the TSCs identified on the SPIR for final consideration before the Committee Draft for Vote (CDV) draft.
- (i) Balloting shall be effected by the sponsoring SSC adhering to the balloting requirements in Clause 7 (and applicable subclauses). Once balloting begins, the balloting group will be closed to additional members.
- (j) Each ballot comment, or coordinating subcommittee comments, (including those from the identified technical subcommittees) shall be entered into the Summary Comment Form (Appendix D) and shall include the following:
 - Name of individual
 - Location of the text reference for each comment
 - Reason for voting negative – rationale or error
 - Proposed wording that would cause the individual to change their vote to affirmative

- (k) After the initial ballot, SCDVs that are modified to incorporate comments or reconcile negative votes shall be recirculated to the balloting group along with the *Summary Comment Form* (Appendix D) that includes the following information:
 - Name of individual
 - Location of the text reference for each comment
 - Reason for negative vote and wording change required to change vote to approval
 - SSC rebuttal or change incorporated to reconcile negative ballot
- (l) On the SCDV recirculation ballot, members of the balloting group will only be able to change their vote on issues addressed by the recirculation. Any new issue or recommended technical change obtained during recirculation shall be retained by the Secretariat for consideration during the next maintenance cycle. Copies of ballots and Summary Comment forms shall be submitted to the Secretariat for record retention.
- (m) Once the SCDV is approved, the chair of the SSC shall forward a paper copy and electronic file of the final approved SCDV to the Editorial Working Group (EWG) for review for style and consistency.
- (n) During the EWG review, the Secretariat shall prepare a letter ballot and establish a Committee Balloting Group.
- (o) If following EWG review any substantive changes have been recommended, the SSC Chair shall recirculate the revised SCDV to the SSC balloting group with the EWG recommended changes highlighted.
- (p) Following this recirculation ballot, the SSC Chair shall forward the final approved SCDV along with all ballots for each balloting group member as a CDV to the Secretariat with the *Subcommittee Standard-Document Submittal Form* (Appendix E).

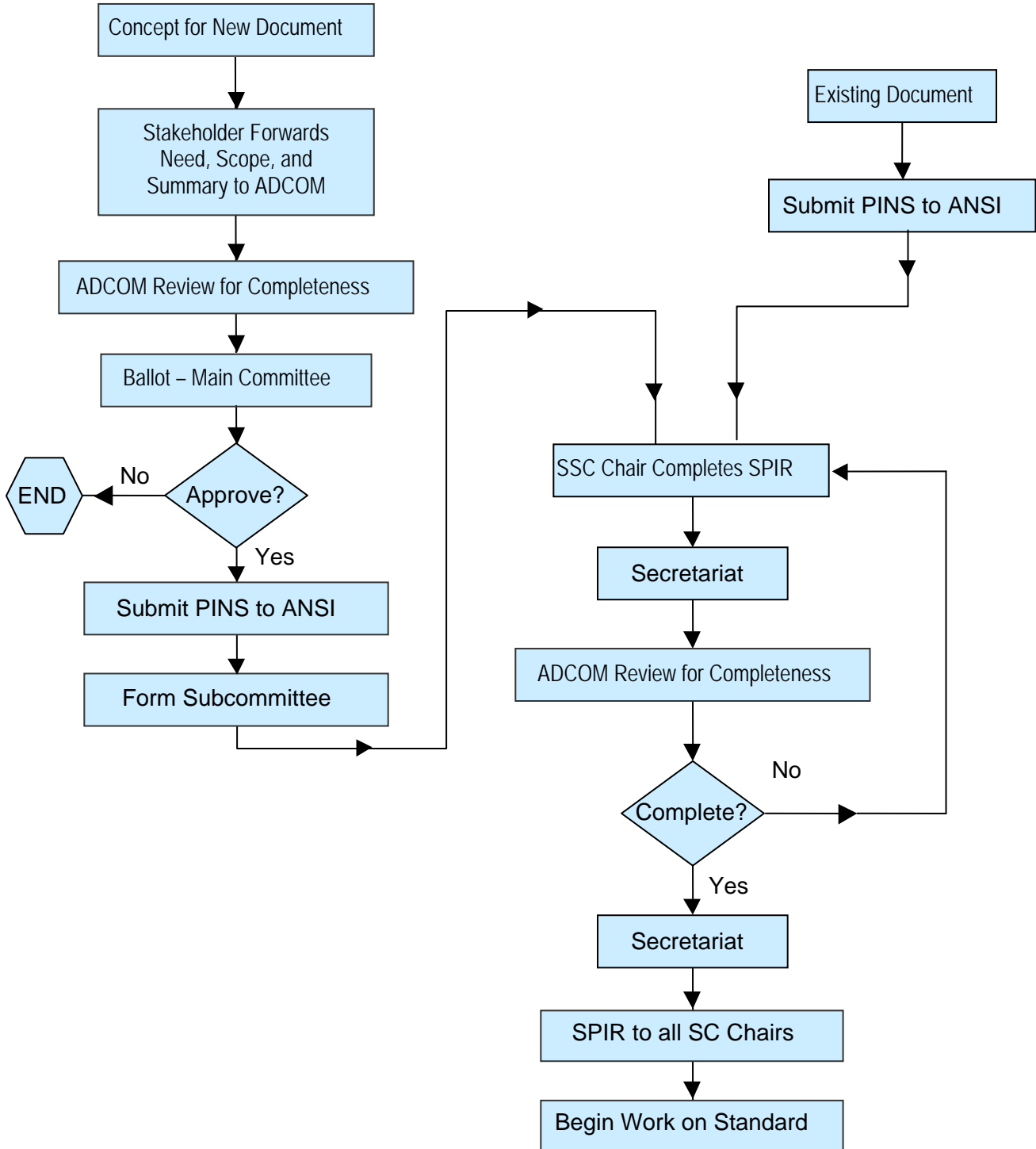
A.2 Outline for Balloting on Draft Standards – Consensus Body (Committee Level)

(See Flowchart A.3)

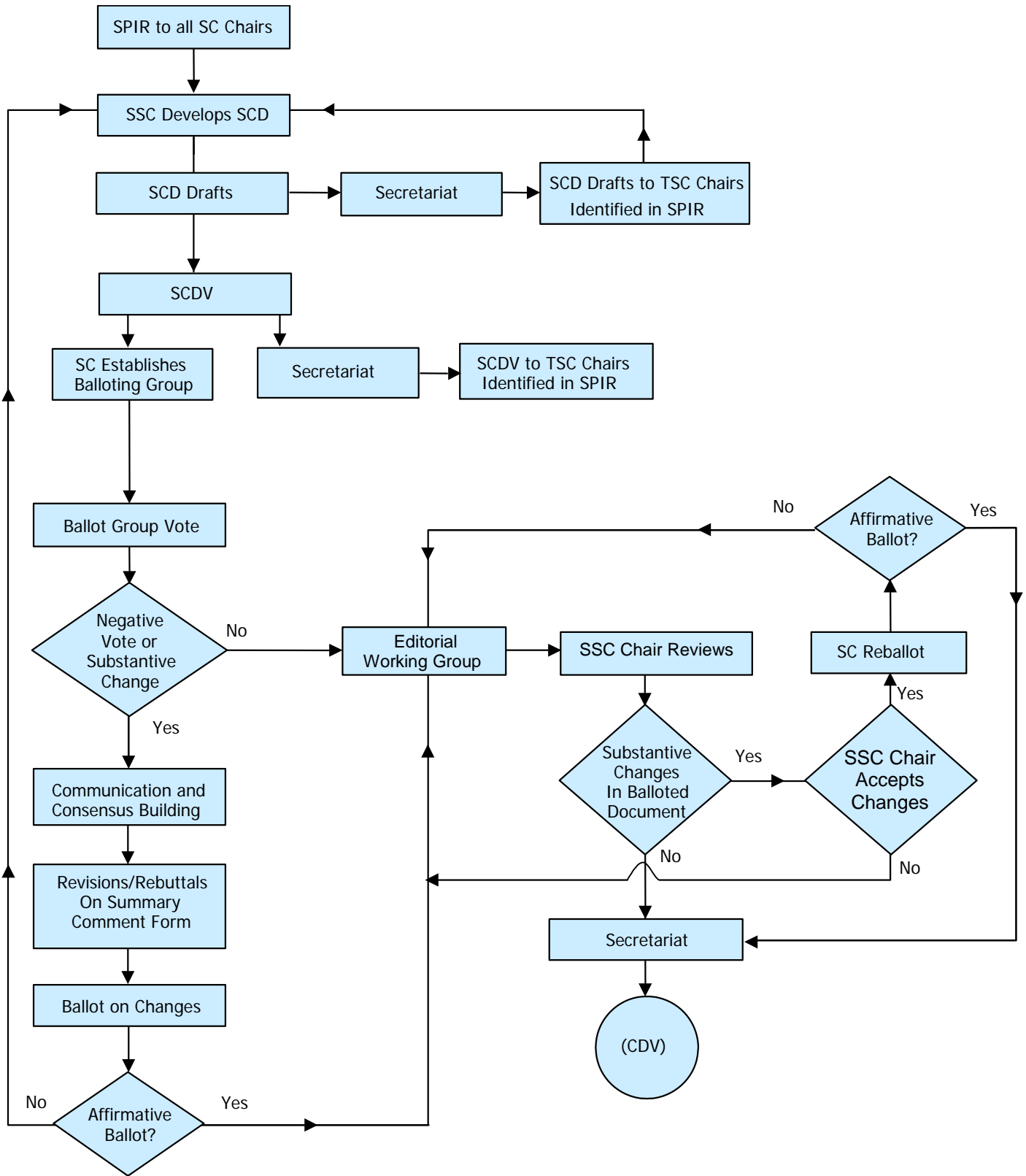
- (a) Committee balloting is conducted by the Secretariat. The Committee balloting draft shall be identified as a committee draft for vote (CDV) with a draft number and date on each page. The balloting requirements in Clause 7 (and applicable subclauses) shall be followed.
- (b) Concurrent with balloting by the Committee, the Secretariat shall transmit the CDV to ANSI using the BSR-8 form, or its equivalent, for listing in *Standards Action* in order to provide an opportunity for public comment. In accordance with ANSI procedures, the public comment period shall be one of the following:
 - A minimum of thirty days if the full text of the revision(s) can be published in *Standards Action*
 - A minimum of forty-five days if the document is available in an electronic format, deliverable within one day of a request, and the source (e.g., URL or an E-mail address) from which it can be obtained by the public is provided to ANSI for announcement in *Standards Action*; or
 - A minimum of sixty days, if neither of the above options is available

Any substantive change subsequently made in a proposed American National Standard requires listing of the change in *Standards Action*.

- (c) If taking into account any appropriately authorized extension of the ballot period, an insufficient number of ballots are returned by the balloting group as specified in Clause 7.9.(a), the Secretariat shall declare the voting invalid and disband the balloting group. The Secretariat shall then effect another invitation to ballot to the committee membership to participate on a new Committee Balloting Group to whom the CDV shall be distributed for vote.
- (d) If insufficient votes for approval are obtained and new issues are raised by the Committee Balloting Group, or other than editorial changes are required to resolve negative votes, the CDV shall be referred to the sponsor subcommittee for revision of the SCDV with a more mature document or to provide comments on the Summary Comment Form (see Appendix D), respectively.
- (e) Each unresolved objection and attempt at resolution, and any substantive change made in a proposed CDV shall be recirculated by the Secretariat to allow each member of the Committee Balloting Group to comment or change their vote on issues addressed by the recirculation. The Summary Comment Form in Appendix D shall be used. In addition, the modified CDV shall be made available to balloting group members to afford each the opportunity to review the document, including incorporated changes, in its entirety. Any new issue or recommended technical change raised during this recirculation shall be retained by the Secretariat for consideration during the next maintenance cycle. Any person with an unresolved objection resulting from the balloting process has the right to appeal in accordance with the procedures outlined in Clause 10.
- (f) The completed approved document shall be forwarded to the EWG who shall review one final time for style and consistency. Any change proposed by the EWG shall be reviewed by the SSC chair, who forwards to the ADCOM for review. Final editorial changes are incorporated into the final document with concurrence of the SSC chair and ADCOM. If any proposed changes are deemed to be substantive, they shall be recirculated to the balloting group via default ballot.



Flowchart A.1 – Z136 Standards Development Process (Project Initiation)



Flowchart A.2 – Z136 Standards Development Process (Subcommittee Balloting)

APPENDIX B

Informative

Subcommittee Project Initiation Request (SPIR) Form

Date of Request _____ **Date of Approval** _____

(filled out by ADCOM)

Project Number _____

Project Title _____

Document Type _____

(Standard, Recommended Practice, or Guide)

Project Type _____

(New, Revision, Amendment, or Corrigenda)

<i>Subcommittee Chair Information</i>	
Name _____	Phone _____
Email _____	Fax _____

Number of Subcommittee Members in Drafting Working Group _____

Minimum Number of Persons Committed to Work Actively on this Project _____

Timetable for Completion of Proposed Project _____

Expected Date for SCDV Ballot _____

Expected Date for CDV Ballot _____

Scope of Proposed Project _____

Purpose of Proposed Project _____

**Subcommittee Project Initiation Request (SPIR) Form
(continued)**

Stakeholders likely to be impacted by the project _____
(e.g., telecom, medical, environmental, etc.)

Detailed Outline of Proposed Project _____

Not required for reaffirmations or corrigenda

Is this standard planned for adoption by another international organization? _____

If "YES", what organization _____

If "NO", explain _____

<i>Proposed Coordination / Recommended Method of Coordination</i>	
	Organization / Committee
	Method*
Mandatory Coordination <i>(coordinating subcommittees requested by ADCOM)</i>	_____

Requested Coordination <i>(coordinating subcommittees requested by subcommittee)</i>	_____

Additional Explanation Notes _____

*Circulation of Drafts (DR); Liaison Members (LI); or Common Membership (CO)

APPENDIX C

Informative

Invitation to Ballot Form

You are invited to ballot on the [] Subcommittee Draft for Vote or [] Committee Draft for Vote on the new or revised: (insert document title here)

Background: ASC Z136 Procedures call for the establishment of balloting groups prior to voting on any new or revised document. Balloters will be given a specified time period in which to respond to the ballot. In order for the ballot to be valid, at least 75% of the ballots sent must be returned. If you agree to become part of the following balloting group, you will be expected to vote on the document when it reaches the voting stage.

Affirmation Statement

I affirm that I have a material interest in the standard being balloted and have the expertise necessary to effect an informed decision. By agreeing to participate in this ballot, I have an obligation to respond. I understand that failure to return a completed ballot may disqualify me from participating in future ballots.

- [] Yes, I agree to participate in the balloting group and will return the ballot by the specified due date.
[] No, I am not interested in participating on this balloting group.

Name: _____ Phone #: _____
Company: _____ Fax #: _____
Address: _____ Email: _____
Signature: _____ Date: _____
(Not necessary if emailing from a known email address)

Interest Category - Check the interest category that you represent for this ballot (select only one):

- [] Academia [] Consultant [] Consumer/Consumer Organization
[] Department of Defense (DoD) [] Directly Affected Public [] Distributor/Retailer
[] Government (non-DoD) [] Government Contractor [] Health Care
[] Industrial/Commerce [] Manufacturer [] Professional Society
[] Regulatory Agency [] Testing Laboratory/Facility [] Trade Association

This form must be received by (insert to whom) by close of business, (insert date and time)

Please email, fax or mail to the following:

Name: Phone:
Address: FAX#:
City, State, Zip: Email:

NO RESPONSES TO THIS INVITATION WILL BE ACCEPTED AFTER (insert date and time here)

APPENDIX D

Informative

Summary Comment Form

Title of Draft:

**Number and Date of
Draft:**

Title of Subcommittee:

Submitted by Name []	Text Reference Location for Comment	Comment – Rationale or Error	Proposed Change	Resolution of Comment by Subcommittee

APPENDIX E

Informative

Subcommittee Standard-Document Submittal Form

- 1. **PROJECT NUMBER:** [....]
- 2. **DATE:** [200x mm dd]
- 3. **TITLE:** [....]
- 4. **SPONSOR (Full Name of Subcommittee):** [....]
- 5. **BALLOTING POOL (All who were sent the invitation to ballot):** (Complete table below, add rows as necessary)

Name	Affiliation	Subcommittee	Interest Classification

- 6. **NAME AND ADDRESS OF SUBMITTER:** [...]

Telephone: [] **Fax:** [] **E-Mail:** []

- 7. **DESCRIPTION OF DOCUMENT:** (Check one from each column.)

- New Standard Full Use (5-year life cycle)
- Revision Recommended Practice Trial Use (2-year life cycle)
- Reaffirmation Guide
- Withdrawal Amendment/Corrigenda to an existing standard (Indicate number and year)

7A. REAFFIRMATION ONLY: In the opinion of the balloting group, this standard continues to be useful in its current form and contains no significant obsolete or erroneous information.

- Yes No

8. BALLOT INFORMATION

List the interest categories of eligible balloters only.

Interest Category	No.	Interest Category	No.	Interest Category	No.	Interest Category	No.
-------------------	-----	-------------------	-----	-------------------	-----	-------------------	-----

9. SUMMARY OF ELIGIBLE BALLOTS: (Complete table below)

	<u>INITIAL BALLOT</u>		<u>RECIRCULATION BALLOT</u> (if applicable)	
	Draft <u>Number</u>	Date Closed: <u>Percentage</u>	Draft <u>Number</u>	Date Closed: <u>Percentage</u>
Ballots Mailed	_____	<u>100%</u>	_____	<u>100%</u>
Ballots Returned	_____	_____	_____	_____
Affirmatives	_____	_____	_____	_____
Negatives	_____	N/A	_____	N/A
Abstentions	_____	_____	_____	_____
Reasons for abstentions:	Lack of time = _____		Lack of expertise = _____	
	Other = _____			

10. RESOLUTION OF COMMENTS AND NEGATIVE VOTES

All balloting group members, and coordinating groups have been advised of substantive changes made with respect to the balloted draft standard (in response to comments, in resolving negative votes, or for other reasons) and have received copies of all unresolved negative votes with reasons from the negative voter and the rebuttal, and have been advised that they have an opportunity to change their votes.

- A. Have unresolved negative votes been circulated? Yes No No unresolved votes

Include unresolved negative comments and rebuttal.

B. Have substantive document changes been circulated? Yes No No substantive change

11. INTERNATIONAL STANDARDS ACTIVITIES

Is this document intended to be the basis of or included in an international standard? Yes No (Explain)

12. SOURCE MATERIALS SUBMITTED TO ASC Z136 Secretariat

A. Have electronic versions of the source documents (text and figures) been provided? Yes No Format: _____

B. Will a diskette or other online material be required to accompany the published standard? Yes No

13. SUBMISSION CHECKLIST (X = included in submittal package N/A = Not applicable)

X	Submission Package Item	
	This submittal form	
	Ballot summary form(s) (1 per ballot cycle)	
	Copies of <u>unresolved</u> negatives & rebuttals	
	Final balloted draft of proposed standard ___ # of complete paper copies of draft # ___	

<i>This draft standard has been developed in accordance with the policies and procedures of ASC Z136 and I am authorized by those policies and procedures to make this submittal.</i>	
Signature of Submitter	Title (role in Sponsor)

APPENDIX F

Informative

Interpretations Procedures Flowchart

