

COMMENTS

Date 02-Oct-01	Document ASC C37 Operating Procedures, D2A
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02-Oct-2001: Updated to reflect decisions by ASC C37 Committee in meeting in Quebec, 02-Oct-2001

Discusser's name	Clause/ Subclause	Paragraph Figure/ Table	Type of comment (G=General/ T=Technical/ E=Editorial)	COMMENTS	Proposed change	OBSERVATIONS OF THE CHAIR On each comment submitted
Item 1 Swindler (NEMA)	All	All	G	Refer to attached letter (follows comments)	No specific proposal.	<u>ASC C37 Committee decision 02-Oct-01</u> Time did not allow discussion of this item during the meeting. Discussion of this item by E-Mail will be initiated. Note that changes resulting from consideration of Mr. Swindler's comments may dictate changes in several areas of the operating procedures.
Item 2 Stone (NEMA)	Scope	1	E	Solid dielectric should be mentioned along with air, vacuum, liquid etc	Add "solid dielectric" to the list of included designs.	<u>ASC C37 Committee decision 02-Oct-01</u> Accept.
Item 3 Gettman (NEMA coordination)	(Scope) 1	Note	E	In the note, Substation and Relay standards are excluded from the scope of C37 but the note indicates they MAY still bear the C37 designation.	Suggest change "may" to "may not".	<u>ASC C37 Committee decision 02-Oct-01</u> Do not accept. Substation and Relay standards do use the C37 designation. Relay standards use the C37.90 – C37.120 range (excluding C37.100), while Substation standards use C37.121- and higher.
Item 4 Koepfinger (EEI)	(Scope) 1	Note	E	It should be made clear that the substation and relay standards using the C37 designation are not processed for status as American National Standards by ASC C37	In the Note before the word "Substation" add "IEEE"	<u>ASC C37 Committee decision 02-Oct-01</u> Accept.
Item 5 Stone (NEMA)	(Scope) 3	1-2	T	It is not clear what is meant by listing IEEE and NEMA as part of the Scope. The first and second items under scope are action words "Develop" and "Act". Sub item 3 simply lists the organizations. One could ask why EEI/EL&P is not included.	Since I do not know the intent, I cannot offer any suggested wording.	<u>ASC C37 Committee decision 02-Oct-01</u> The intent may have been to describe the interests of the two Co-Secretariat organizations. These two organizations support almost all of the working groups on switchgear standards in the C37 series. Relocate these two paragraphs to be new paragraphs added to the end of existing clause A3.2.

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Item 6 Stone (NEMA)	A3	(3)	E	Delete "...up-to-date". Does not add any meaning to the clause.	Delete "up-to-date"	ASC C37 Committee decision 02-Oct-01 Accept.
Item 7 Gettman (NEMA coordination)	A3.1	Item 1	G	There is no item which indicates that the committee membership may be responsible for the adoption of standards in addition to its development efforts.	Suggest change (1) to read: "Developing proposed <u>and</u> <u>evaluating standards developed</u> <u>outside the US for adoption as</u> American National Standards within its scope."	ASC C37 Committee decision 02-Oct-01 This change is not accepted. This existing text allows this.
Item 8 Gettman (NEMA coordination)	A3.1	Item 4	E	There is no reason the membership cannot develop, in addition to adopting, interpretation policies and procedures.	Suggest change (4) to read: "Adopting <u>or Developing</u> Committee policy and ..."	ASC C37 Committee decision 02-Oct-01 Accept.
Item 9 Gettman (NEMA coordination)	A3.1	Item 6	E	Same comments as item 4	Same proposal as item 4	ASC C37 Committee decision 02-Oct-01 Accept.
Item 10 Gettman (NEMA coordination)	A3.2	1	E	The reference on line 3 is to Appendix B but this is not correct.	Suggest change reference to Appendix C	ASC C37 Committee decision 02-Oct-01 Accept.
Item 11 Lemmerman (IEEE)	A3.2	1	E	Reference to appendix B should be to appendix C instead.	Change "Appendix B" to "Appendix C"	ASC C37 Committee decision 02-Oct-01 Same as Gettman comment. Accept.
Item 12 Gettman (NEMA coordination)	A3.2.2	2	E	Since there is no requirement that every standard developed by an organization must be submitted for ANS, this statement in paragraph 2 should change.	Suggest revise para. 2 as follows: "Each Co-Secretariat organization will <u>be responsible for submitting</u> its own standards..."	ASC C37 Committee decision 02-Oct-01 The suggested words do not change the meaning. This change is not accepted.

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Item 13 Koepfinger (EEI)	A3.2.2	1	E	The MOU does not require the co-secretariat conducting the ballot to inform the other co-secretariat of the ballot results. Consequently, there is no way the administrative secretariat, secretary can inform the Chair and Vice Chair of the Committee of the Ballot results. Nor is there any way the Administrative Secretariat can monitor the ballot participation as required by these operation procedures.	Add the following statement after the first sentence of this clause: In addition each con-secretariat shall provide the other with the results of the ballots and as a minimum a list of names to whom ballots were sent and a list of names of those responding to the ballot.	<u>ASC C37 Committee decision 02-Oct-01</u> Under the proposed revised operating procedures, the Committee Secretary will prepare reports of ballot results (see Appendix B, clause 6, paragraph 4). Since the proposed revised procedures make the Committee Secretary responsible for receiving and summarizing ballots and comments on all ballots, and require copies to each Co-Secretariat, no further change is needed.
Item 14 Gettman (NEMA coordination)	A4	1	T	There is no indication that the terms of office for the Chair and Vice Chairs should or should not be concurrent.	Suggest adding the following: "It is suggested that the terms of office for the Chair and Vice Chairs be concurrent. Should the a replacement be needed for the Chair position before the end of a term and with less than ½ the term remaining, the Vice-Chair Technical who serves as successor shall be eligible for renominaton for the following full term."	<u>ASC C37 Committee decision 02-Oct-01</u> Accept. Note, the number and responsibilities of the Vice-Chairs is a subject of discussion (see item 1, and Mr. Swindler's letter following the list of comments. This may change the exact words needed to implement Mr. Gettman's suggested change.
Item 15 Gettman (NEMA coordination)	A4	1	T	The second sentence on line 3 indicates the term of office should be 3 years but Annex B specifies 5 years.	Suggest revise to be consistent.	<u>ASC C37 Committee decision 02-Oct-01</u> Clause A4 is correct (3 years). Appendix B needs to change, as indicated in other comments.
Item 16 Gettman (NEMA coordination)	A5	1	E	The description or list of entities which can constitute the membership is not consistent from clause to clause. Also, sentence one parenthetical statement should not indicate a preference for national organizations.	Suggest revise first sentence as follows: "...shall consist of organizations, companies, government agencies, etc., having a direct and...".	<u>ASC C37 Committee decision 02-Oct-01</u> The ANSI "Model Procedures" use the phrase "preferably national in scope". ANSI stands for "American National Standards Institute", which suggests that it is entirely appropriate to state a preference for organizations that are national in scope. Therefore, no change is appropriate.

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Item 17 Gettman (NEMA coordination)	A5	1	E	The second sentence implies that termination of membership is subject to approval even if the member requests it.	Suggest revise second sentence as follows: "The addition or termination (unless requested by the member in question) of members shall be ..."	<u>ASC C37 Committee decision 02-Oct-01</u> Accept.
Item 18 Lemmerman (IEEE)	A5.1	1	E	Correct grammar.	Change "... as required to for determination votes ..." to "... as required for determination of ...".	<u>ASC C37 Committee decision 02-Oct-01</u> Accept.
Item 19 Gettman (NEMA coordination)	A5.1.2	1	E	This essentially duplicates the information in Appendix B.4.A.	Suggest delete information already contained in Appendix B and just make reference.	<u>ASC C37 Committee decision 02-Oct-01</u> Accept in principle. Clause A5.1.2 should be retained without change. In Appendix B, Clause 4, delete item A on "Diverse Interests", and move item B so that it is a non-indented paragraph of the clause.
Item 20 Gettman (NEMA coordination)	A5.2	1	E	The text of the last sentence is unclear as to whether the voting by the members of a delegation vote as individuals or as a group/block.	Suggest revise text to specify either individual or block voting or a combination dependent on particular circumstances.	<u>ASC C37 Committee decision 02-Oct-01</u> A5.2 does not specify how delegations determine their vote. This is consistent with clause A8.1.2 (third paragraph) which essentially says that it is up to the organization to determine how the votes of the delegation are to be cast. The clear intent is that ASC C37 does not tell the delegations how the delegation vote should be determined. Therefore, no change should be made.
Item 21 Koepfinger (EEI)	A5.2	1	E	Since there are two types of secretariats it should be make clear which one is intended in this statement.	Add before "Secretariat" the word "Adiminstrative"	<u>ASC C37 Committee decision 02-Oct-01</u> Accept in principle. This task should be performed by the Committee Secretary. The most important criterion as to whether or not a member is fulfilling the membership obligations is the voting record. Under the proposed revised procedures, the Committee Secretary prepares the ballot summaries for all balloted documents. Accordingly, the term "Secretariat" should be changed to "Committee Secretary" in both places in which it occurs.

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Item 22 Lemmerman (IEEE)	A5.5	1	E	The committee roster should be maintained by the Committee Secretary rather than by the Secretariat.	At the beginning of the first sentence, change "the Secretariat" to "The Committee Secretary". Also, in the middle of the first sentence, change "Co-Secretariat" to "Co-Secretariats".	<u>ASC C37 Committee decision 02-Oct-01</u> Accept. This was the original intent of the revised procedures, but was missed when the draft was created.
Item 23 Gettman (NEMA coordination)	A6	(1)	E	In item (1), the punctuation at the end of the item makes the text unclear.	Suggest replacing the comma at the end of the item with a semi-colon.	<u>ASC C37 Committee decision 02-Oct-01</u> Accept.
Item 24 Gettman (NEMA coordination)	A8.1.2	2	E	In the second paragraph, it is unclear what "others" is referring to.	Suggest revise as follows: "...of that delegation, and all others individuals not in these instructed delegations will have one vote each."	<u>ASC C37 Committee decision 02-Oct-01</u> Accept.
Item 25 Gettman (NEMA coordination)	A8.1.2	3	E	In the third paragraph 2nd sentence, it is unclear what "organizational" refers to.	Suggest replace "organizational" with "delegation".	<u>ASC C37 Committee decision 02-Oct-01</u> The "delegation" represents its parent or sponsoring organization, e.g., the IEEE delegation represents the interests of IEEE. Therefore, for this example, it is IEEE's responsibility to define the scheme by which it instructs the delegation to vote. The delegation doesn't define the scheme. Therefore, the language used correctly reflects the intent, this change is not accepted.
Item 26 Gettman (NEMA coordination)	A8.1.3	2	T	The follow-up message for ballots is to be sent "two" working days before the ballot closes. This is likely to be an inadequate time period to permit response.	Suggest revise "two" to "five" as this will more likely permit a response.	<u>ASC C37 Committee decision 02-Oct-01</u> Change "within two days" to "at least five days".

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Item 27 Koepfinger (EEI)	A8.1.3	1	T	This clause is in conflict with the process now being followed by IEEE	IEEE MOU clause title legal requirements , second paragraph, states that if there is a conflict between the policies of the Co-secretariats the more stringent protective policy shall prevail. This raises the question at to whether the voting period is considered a protective policy.	<p><u>ASC C37 Committee decision 02-Oct-01</u> Mr. Koepfinger is referring to the clause in the MOU (Appendix C , second paragraph under “Legal Requirements”, which reads:</p> <p>All of the activities of the Committees shall be subject to review by each organization and its legal counsel to ensure compliance. In the event of a difference between the policies of the Co-Secretariat organizations, they shall consult one another, but in general, the more stringent protective policy shall prevail.</p> <p>This conflict has existed for many years, because the C37 voting period has always been longer than the IEEE voting period. One of the major changes incorporated into the proposed revised procedures is to reduce the C37 voting period to only about 15 days longer than the IEEE voting period. Thus, the opportunity for conflict should be decreased.</p> <p>It is unlikely that the length of the voting period would be considered as a “protective policy” under the “Legal Requirements” clause of the MOU.</p> <p>Therefore, this change is not accepted.</p>
Item 28 Gettman (NEMA coordination)	A8.2	1	T	It is unclear whether the membership at a meeting needs to represent a majority to have a valid voting action or whether a simple majority of the members present at a meeting, regardless the percentage of total membership, is sufficient.	Suggest revise first sentence to read: “...require approval by a majority of the total number of members, whether at a meeting or by letter ballot.”	<p><u>ASC C37 Committee decision 02-Oct-01</u> The language used is that in the ANSI model procedures. The requirement is for a “majority of the membership of the Committee”. However, the proposed language reinforces the intent. This change is accepted.</p>

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Item 29 Gettman (NEMA coordination)	A8.5	2	E	In the 2nd paragraph, the secretariat is to send a copy of a standard to the USNC TAG. There is no indication of the reason for this action or what the TAG is to do in response.	Suggest either adding an explanation of the reason for TAG involvement and expected response or delete the requirement for the action.	<p><u>ASC C37 Committee decision 02-Oct-01</u> Clause 2 under the description of the scope of C37 (at the beginning of the Operating Procedures) states the objective of coordinating with the TA's on the relevant TC/SC groups, and this clause supports the stated objective. The larger questions are whether or not this clause is actually being followed, and whether the documents are actually useful to the TA's.</p> <p>No change will be made at this time.</p> <p>The aspect of the role of C37 with respect to TA's, TAG's, and TC/SC groups should be discussed in future committee meetings.</p>
Item 30 Gettman (NEMA coordination)	A8.6	3	E	At the end of the 3 rd paragraph, the members are given 15 days to respond. It does not indicate 15 days from what.	Given the use of electronic distribution, it is suggested that this specify 15 calendar days from the transmission date of the message reporting the changes.	<p><u>ASC C37 Committee decision 02-Oct-01</u> The ANSI model procedures use four weeks instead of 15 days. It is felt that this clause has never been implemented. Instead, the actual practice is that all comments (even if several comments conflict) are forwarded to the working group that originated the document for resolution. This is perhaps not as it should be, but the practical reality is that the entire C37 committee should seldom be required to get involved in resolution of comments. This activity is left up to the working group, who addresses the comment in the appropriate manner, and prepares a revised document for re-ballot.</p> <p>Since this clause complies (except for time limit) with the ANSI model procedures, and has not caused problems in the past, this change is not accepted.</p>
Item 31 Lemmerman (IEEE)	A8.7	1	E	Correct grammar.	Change "... categories and to..." to "...categories, and..."	<u>ASC C37 Committee decision 02-Oct-01</u> Accept.

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Item 32 Gettman (NEMA coordination)	A9	1	T	This clause specifies that any member may make a submittal of a standard to ANSI. It does not specify that this action should be taken on behalf of C37 and no other organization or entity.	Add the following new last sentence: "Such submittal of a standard must be specified to be on behalf of C37, and no other organization or entity."	<u>ASC C37 Committee decision 02-Oct-01</u> This wording is essentially that in the ANSI model procedures, but it is really puzzling. How would "any member of the Committee" have the necessary detailed information that ANSI requires in order to submit the proposed standard to ANSI? Realistically, only the Committee Secretary or either of the Co-Secretariats would have access to the definitive information that ANSI requires. The Committee Secretary is not (per se) a recognized standards development organization ("Accredited Standards Developer"), so the Committee Secretary cannot make such a submittal. The only logical alternative if the responsible Co-Secretariat doesn't fulfill their responsibility is for the other Co-Secretariat organization to do so. Therefore, the following changes will be made to the last sentence: <ul style="list-style-type: none"> • Change "Secretariat" to "responsible Co-Secretariat", and • Change "any member(s) of the Committee" to "the other Co-Secretariat". The change suggested by Mr. Gettman is not accepted.
Item 33 Gettman (NEMA coordination)	A10	3	T	The last paragraph is essentially an "if...then" statement but the "then" part is not provided. Thus, there is no instruction as to the action should the designated entities NOT find that termination is best.	Suggest add instructions concerning this aspect of the situation.	<u>ASC C37 Committee decision 02-Oct-01</u> The statement does include the instructions, but the word "then" is missing. Accordingly, change "... reached by termination, the proposal and..." to "reached by termination, then the proposal and..."
Item 34 Notarian (Safety)	App. B	2A	G	5 year term should be three year term	Change 5 to 3	<u>ASC C37 Committee decision 02-Oct-01</u> Accept.

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Item 35 Olsen (NEMA)	App. B	2A	E	(with compliments to P. Notarian who discovered the clerical error). The text of 2A indicates a term of 5 years for the chair and vice-chairs, whereas it was intended to change this to 3 years. A 3-year term is indicated in the summary of changes letter and in clause A4.	In the first sentence, change the term from "five years" to "three years".	<u>ASC C37 Committee decision 02-Oct-01</u> Same subject as raised by Mr. Notarian. Accept.
Item 36 Lemmerman (IEEE)	App. B	2A	E	5 year term disagrees with A4.	This paragraph should be rewritten to agree with paragraph A4.	<u>ASC C37 Committee decision 02-Oct-01</u> Three years is intended. This is the same subject as raised by Mr. Notarian.
Item 37 Gettman (NEMA coordination)	App. B	2D	T	In item D, it is not specified how or by whom the member is selected from the "non-delegation" segment.	Suggest adding criteria to specify how and by whom this selection is made.	<u>ASC C37 Committee decision 02-Oct-01</u> Accept in principle. Since this member is intended to represent the interests of the "non-delegation" members, the selection should be made by the "non-delegation" members. Therefore, an additional sentence will be added, to read: The "non-delegation" member shall be selected by a majority vote of the "non-delegation" members of the Committee. Side comment: The concept of the "non-delegation" member of the Executive Committee when the revised procedures were being drafted, so as to cause the Executive Committee to have an odd number of members. An odd number is desirable when a majority vote is needed. Separately, the C37 Committee must consider Mr. Swindler's comments (see comment 1 and Mr. Swindler's letter following these comments). This consideration may lead to a change in the number of Vice-Chair positions. If the number of Vice-Chairs changes, the committee may want to revisit the issue of the number of members of the Executive Committee.

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Item 38 Gettman (NEMA coordination)	App. B	2E	T	Unless the Technical Advisor or TAG administrator is invited to be the Vice-Chair (IEC activities), this individual is NOT responsible for coordination the TAG activities. Also, the C37 committee has not provided funding for TAG activities and no provision has been made for accumulating funding to accomplish this.	Suggest adding "with" after "coordinating". Suggest clarifying whether this funding is for the TAG itself or for the coordination activity between C37 and the TAG.	<u>ASC C37 Committee decision 02-Oct-01</u> Accept suggested change. The "funding" discussed is only funding within the C37 committee, not funding of the TAG. However, this issue also involves the subject raised by Mr. Swindler (see comment 1, and the letter following these comments).
Item 39 Gettman (NEMA coordination)	App. B	4	T	In item A, there is reference, as in a number of areas of the document, to the three classifications of "organization, company and government agency". No definition of these classifications is provided. Nor is there a definition of any other classification of potential membership. Item A needs clarification to indicate how diverse interests would permit separate parts of a company or departments of a government agency to participate as separate members of C37.	Suggest adding a definition of all classifications for membership. Suggest rewording as follows: "In accordance with Clause A5.1.2, two divisions or operating companies of a private corporation and two departments of a government agency may have separate membership if the specific interest of the two entities can be shown to be different. For example, one division or operating..."	<u>ASC C37 Committee decision 02-Oct-01</u> Refer to Item 19 on clause A5.1.2. As discussed in item 19, item A in clause 4 of Appendix B will be deleted.
Item 40 Gettman (NEMA coordination)	App. B	4	T	In item B, the first word of the second sentence is misspelled.	Change "Cttendance" to "Attendance" and add "also" after "will".	<u>ASC C37 Committee decision 02-Oct-01</u> Accept.
Item 41 Lemmerman (IEEE)	App. B	4B	E	Correct spelling.	Correct "Cttendance" to "Attendance".	<u>ASC C37 Committee decision 02-Oct-01</u> This is same issue as Mr. Gettman's comment. Accept.

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Item 42 Gettman (NEMA coordination)	App. B	6	T	In paragraph three, there is no explanation of when the ballot period starts.	Suggest adding an explanation such as in the comment for A8.6.	<u>ASC C37 Committee decision 02-Oct-01</u> The problem is that different terms are used in different places. If "balloting period" is changed to "voting period", then it ties into the wording of clause A8.1.3, which specifies that the voting period is measured from the date of issue. Change "balloting period" to "voting period".
Item 43 Gettman (NEMA coordination)	App. B	6	T	In paragraph 5, there is no instruction of the action to take if the document is too large for e-mail. There is also no direction of action to take when the e-mail distribution is returned by the system to the initiator.	Suggest specifying that such documents be e-mailed in parts, posted to a web site, or mailed in paper copy. Suggest requiring that the secretariat contact the head of delegation if the member is part of one of the organization delegations or attempt to contact the individual by other means.	<u>ASC C37 Committee decision 02-Oct-01</u> These are valid concerns. This can be remedied by changing the end of the first sentence of the fifth paragraph from "... are not available" to "... are not available or are too large to send by E-Mail. In such cases, alternative means of transmittal may be used (e.g., posting on website, or use of Express Mail, FedEx, or similar services)." The second issue raised in this comment is probably addressed by the same change. If the E-Mail is returned, and other means of transmittal also fail, the above wording would require use of Express Mail or similar transmittal means.
Item 44 Lemmerman (IEEE)	App. B	6	E	Use the correct name for EEI.	In the sixth paragraph, change "Edison Electrical Institute" to "Edison Electric Institute".	<u>ASC C37 Committee decision 02-Oct-01</u> Accept.

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Item 45 Gettman (NEMA coordination)	App. B	7	E	There is no explanation of the term "safety group". There needs to be a specification as to whether the re-balloting shall be of the changed document. The requirement for a 7/8 vote does not specify of what.	Suggest clarifying these points.	<p><u>ASC C37 Committee decision 02-Oct-01</u> This should be clarified in Appendix B, clause 4, on Membership. The last paragraph of clause 4 should have a sentence added, as follows:</p> <p>"The Committee membership shall include a "Safety Group", ordinarily composed of two members, who represent organizations recognized by OSHA as National Recognized Testing Laboratories, or other such organizations whose mission is clearly focused on safety issues."</p> <p>Side Comment: Organizations Currently Recognized By OSHA as NRTLs include: Applied Research Laboratories, Inc. (ARL) Canadian Standards Association (CSA) Communication Certification Laboratory, Inc. Curtis-Straus LLC (CSL) Detroit Testing Laboratory, Inc. Electro-Test, Inc. Entela, Inc. Factory Mutual Research Corp. Intertek Testing Services NA, Inc. MET Laboratories, Inc. NSF International National Technical Systems, Inc. SGS U.S. Testing Company, Inc. Southwest Research Institute TUV Product Services GmbH TUV Rheinland of North America, Inc. Underwriters Laboratories Inc. Wyle Laboratories, Inc.</p>

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Item 46 Sigmon (IEEE)	App. B	7	G	To require seven-eighths vote for approval promises a deadlock in the approval process. It will essentially allow a veto by one of the delegations.	The ratio of three-quarters is more acceptable and still requires greater consensus than a trial use standard requires.	<u>ASC C37 Committee decision 02-Oct-01</u> Change to require two-thirds, instead of seven-eighths. This effectively removes the “super majority” provision, and requires changes elsewhere in the document to coordinate with this change.
<i>Additional comments received after original list created:</i>						
Item 47 N. Ahmad (IEEE coordination)	A14	1	G	Change 1st sentence to: It is the responsibility of organizations to provide indemnification to its members.	See comment.	<u>ASC C37 Committee decision 02-Oct-01</u> Accept.
Item 48 N. Ahmad (IEEE coordination)	App. B	6, para. 1	G	IEEE ASC C37 ballot is sent by mail.	None.	<u>ASC C37 Committee decision 02-Oct-01</u> It is acknowledged that this will require a change of IEEE procedure. Note, the requirement is for electronic distribution of ballots, but does not require complete “electronic balloting”, including submittal of ballots and votes electronically.
Item 49 N. Ahmad (IEEE coordination)	App. B	6, para. 2		Committee Secretary should be defined	See comment.	<u>ASC C37 Committee decision 02-Oct-01</u> This will be done. The Committee Secretary performs most of the functions listed under A3.2.1.
Item 50 N. Ahmad (IEEE coordination)	App. B	6, para. 2		This contradicts with MOU page C-2 - Administration.	None.	<u>ASC C37 Committee decision 02-Oct-01</u> This is understood. If the procedures are approved, an addendum or equivalent modification of the MOU between IEEE and NEMA will be necessary.

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Item 51 N. Ahmad (IEEE coordination)	App. B	6, para. 3		IEEE provides (30 days + 10 days for mail) for ballot and(10 days+ 10 days for mail) for recirculation.	None.	<u>ASC C37 Committee decision 02-Oct-01</u> This is understood. The voting period for ASC C37 and for IEEE-SA has always been different. One of the objectives of the proposed revised operating procedures is to shorten the difference between the ASC C37 and IEEE-SA voting periods.
Item 52 N. Ahmad (IEEE coordination)	App. B	6, para. 4		First sentence contradicts with MOU page C-2 -Administration.		<u>ASC C37 Committee decision 02-Oct-01</u> This is understood. If the procedures are approved, an addendum or equivalent modification of the MOU between IEEE and NEMA will be necessary.
Item 53 N. Ahmad (IEEE coordination)	App. B	7		This will not work. We had problems even to get 51 % approval. IEEE position is if the IEEE ballot has passed (75 % approval) and recirculation(if needed) has been done, the standard will submitted to ANSI for approval. IEEE will not delay the printing of the standard if ASC C37 ballot has hung-up or failed. Also IEEE will not print it as a Trial-Use Standard.		<u>ASC C37 Committee decision 02-Oct-01</u> It is agreed that the process has not worked consistently well in the past. The objective of the proposed changes is to improve the system, clearly allocate responsibilities, and generally, to make the process work in the future. With regard to "Trial Use" documents, IEEE has printed Trial-Use documents in the past (e.g., C37.20.4-1996, "IEEE Trial-Use Standard for Indoor AC Switches (1 kV–38 kV) for Use in Metal-Enclosed Switchgear". Also, the Dec., 2000 edition of the "IEEE-SA Standards Board Operations Manual" recognizes trial-use documents and establishes procedures for their approval and publication. Therefore, there should be no reason for IEEE to refuse to publish a trial-use document approved in accordance with the requirements for such documents.

Attachment: Reproduction of letter submitted with comments by D. L. Swindler.



SQUARE D COMPANY
SCHNEIDER ELECTRIC

David L. Swindler, P.E.
330 Weakley Ln., Smyrna, TN 38167
Phone: (615) 459-1311 Fax: (615) 459-1312

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Mr. J. Collins
NEMA
1300 N 17th Street Suite 1847
Rosslyn, VA 22209

Dear John:

I will be retiring from Square D at the end of July and will no longer have interest in NEMA or ASC activities but will remain somewhat active in the IEEE Switchgear Committee. I have been trying to retire as ASC C37 Vice-Chairman of IEC Activities for the past 3 years. I have even located a successor but no action has been taken on my request. After the May ASC meeting, I will simply cease to exist. With this as background, you will have a better understanding

In all seriousness I would strongly consider eliminating the office Vice Chair of IEC Activities. This function may have had some need in days gone by but things have changed and I would suggest there is no need for such a function unless that individual had nothing else to do but to monitor IEC acidity and be somewhat of a busy body. We have the USNC, IEC Technical Advisors, and IEC Technical Committees. A person representing an area of interest from any manufacturer or user should be involved in all appropriate standards activities that involves his particular product of interest. In my opinion the only way a person can be effective in IEC is to be actively involved in both IEEE/ANSI committees and in the USNC Technical Committee. What the IEC Vice-Chairman has been attempting to do is to get reports form the IEC TA's and then pass them on to the Switcher Committees. This sounds good but the value of the reports have been meaningless. There is rarely any intelligible information in these reports and they end up as being a total waste of time for all concern. If there were any concerns, the only way a person can make any impact on IEC is through the USNC IEC Technical Committee and the IEC TA. I have tried hard to encourage the TA's to write meaningful reports but what we get is information about what documents are being worked on. Rarely are there any meaningful discussions about technical issues. If people in the US are interested in IEC then they have to play their games in the USNC IEC Technical Committee.

I would suggest that you contact several of the IEC TA's and ask them if they feel a Vice-Chairman of C37 offers any benefit. I would suggest to you that they would tell you that all he is, is a pain in the butt. So why continue something that is no benefit to anyone. The function of the ASC is to ensure that ANSI standards conform to ANSI guidelines. These are "American National Standards" created by American interest involved. There does not appear to be any relation between ASC and IEC.

My second concern is relative to the way IEEE has been operating in the past. I feel that ASC C37 should have a lot more control over IEEE if they intend to publish under a C37 designation. The first step in creating an ANSI document should be that before an IEEE PAR is written and submitted to IEEE for approval, the request be first submitted to ASC C37 for approval of the proposed designation to be used such as ANSI / IEEE C37.13.1. It is the responsibility of ASC C37 to ensure that there are not two standards that essentially covers the same product. That problem is now happening. Another problem has been that every time you turn around a proposed draft standard has some sort of strange number like P4802 or PC37.45. There is no need to play games with designation numbers. The designation should be what the standard is intended to be. We should stop the problems right at the start by requiring all agencies, IEEE, NEMA, or who ever, if they intend ultimately to publish a C37 standard, the designation and intended content must be first approved as a project by ASC C37. There has been too much politics going on and we must take a strong position. We cannot continue to have one C37 document say one thing and another C37 standard saying something different for the same product.

I would hope that this effort would finally correct all the issues that have been boiling up for the past 10 years. The only way this is going to happen is that the leadership of ASC is going to have to get tough with all those who wish to submit an ANSI standard through this organization.

Sincerely

David L. Swindler