

From: [Frank Farance](#)
To: [Hall, Travis](#); [REDACTED] [Frank Farance](#)
Cc: [iotrfc2016](#)
Subject: Re: Dept of Commerce, Internet of Things: Inadequate announcement call for comments
Date: Tuesday, May 24, 2016 10:08:05 AM

Travis Hall:

Thank you for returning my call. You're right, I missed the subsequent Federal Register entry that extended the deadline to June 2. However, as we discussed and in context of OMB circular A-119, I think these kinds of deadlines are very short for accredited standards development organizations. ANSI accredits these organizations, with key criteria towards Openness, Due Process, Fairness, and Balance. For your work at Department of Commerce, I believe the "Balance" criteria is very important and gives accredited SDOs significant weight in their representation of various segments of technology standardization. The Balance criteria means: there is a balance of users, manufacturers, service providers, and so on. So when you have a consensus position formulated by an accredited SDO, you might consider it having higher value because it's not just one person/organization making the statement, its broad and balanced ... e.g., it's not just vendors in a manufacturing consortium. And standards committees have formal liaisons, so they have a broad access to people to inform the committee's work via a formal process.

So how does that relate to you? Well with the formality comes extra time to properly call meetings and formally ballot positions and such. I believe a minimum time should be at least 2 months for these kinds Department of Commerce calls for comments so standards committees have time to respond to them.

Also, you should let the standards committees themselves know about these Calls For Comments. Probably your best starting point is to contact ANSI (American National Standards Institute) who accredits these standards development organizations. I've also given you contacts at INCITS, TIA, and IEEE where you might let them know about your Calls For Comments. No need to keep me in the loop, you can contact them directly.

Thanks.

-FF

(disclaimer: these opinions are my own and represent my personal knowledge, I am not representing any of these organizations)

Lisa Rajchel
Senior Director, International Secretariats
American National Standards Institute (ANSI)

Jennifer Garner
Director, INCITS Standards Programs
INCITS/Information Technology Industry Council

[REDACTED] | Web: www.incits.org

Florence Otieno
Director, International Standards Programs
Telecommunications Industry Association (TIA)

[REDACTED]
TIAonline.org | Twitter: @TIAonline and @TIA_NOW

Jodi Haasz
International Affairs Senior Liaison
IEEE Standards Association
445 Hoes Lane

[REDACTED]

--

Frank Farance, Farance Inc. T: [REDACTED] [REDACTED]
<mailto:frank@farance.com> <http://farance.com>
Standards/Products/Services for Information/Communication Technologies