



PLATO Standards Procedures

February 2020

PLATO Standards are developed following the accredited procedures below. PLATO Standards are updated or reaffirmed at least every five years, and the project initiation and public review period are announced in ANSI *Standards Action* as required by the *ANSI Essential Requirements*. These procedures were last updated in October 2019 and reaccredited by ANSI in February 2020.

1. INTRODUCTION

This document constitutes PLATO's accredited procedures for developing evidence of consensus for the approval, reaffirmation, revision, or withdrawal of American National Standards (ANS). These procedures meet the requirements found in the *ANSI Essential Requirements*.

2 DEFINITIONS

simple majority: fifty percent of voting membership, plus 1.

standards action vote: an action recommending or approving publication of a new, revised, or reaffirmed standard or withdrawal of a standard.

Standards Action: a periodical published by ANSI to inform interested persons about an ANS, including proposals to initiate projects to develop or revise an ANS, announce intent to reaffirm or withdraw an existing ANS, communicate status of international standards, announce public review of proposed or revised procedures of ANSI accredited standards developers, etc.

3 DEVELOPMENT OF CANVASS LIST

3.1 PLATO shall develop a list of potential canvasees consisting of those organizations, companies, government agencies, standards developers, individuals, etc., known to be, or who have indicated that they are, directly and materially affected by the standard. PLATO shall meet the *ANSI Essential Requirements* paragraphs 1.2 regarding lack of dominance, and 1.3 and 2.3 to ensure balance. No individual shall represent more than one canvasee.

Historically the criteria for balance are that a) no single interest category constitutes more than one-third of the membership of a consensus body dealing with safety-related standards or b) no single interest category constitutes a majority of the membership of a consensus body dealing with other than safety-related standards.

Interest categories related to portable lighting products are as follows:

User: Organization (company, association, government agency, individual) that uses the products associated with the standard.

General Interest: Organization that has an interest in the use of the products associated with the standard, but neither produces nor uses them directly. This category includes academia and other technical knowledge experts.

Testing Laboratory: Organization that tests the products and/or produces testing equipment associated with the standard.

Producer: Manufacturer of the products associated with the standard or a trade association or society that represents the interests of such manufacturers.

3.2 In order to determine if potential canvasees are interested in participating, PLATO shall conduct a pre-canvass interest survey, in which they inform the potential canvasees in writing about the use of the canvass procedure for developing evidence of consensus, and, if the potential canvasees are interested in participating, obtains an appropriate interest category classification. PLATO's written communication to potential canvasees shall contain the title, designation, scope, description of the standard along with the history of its development, purpose and

intended application of the standard, and an explanation of the ANSI function. The time for response shall be at least 30 days from the date of PLATO's contact and shall be so noted in the communication.

Once an interest survey has been completed for a standard, it need not be repeated for re-balloting of the document. For subsequent ballot cycles (i.e. the 5-year maintenance), balance will be monitored, and surveys of interested parties be issued as appropriate. In addition, PLATO may conduct a single interest survey for a group or category of standards. A canvasee who has indicated a desire to be on PLATO's canvass list for a particular category or categories of standards shall receive the draft document(s), letter ballot(s), and all appropriate information pertaining to 4.2 and 5.

3.3 Notification of standards development and coordination

Notification of standards activity shall be announced in suitable media as appropriate to demonstrate the opportunity for participation by all directly and materially affected persons. Any relevant international or regional guides that may impact the proposed Standard should also be consulted, and the relevant ANSI-Accredited U.S. TAG(s) advised if applicable.

3.3.1 Project Initiation Notification (PINS)

At the initiation of a project to develop or revise an ANS, notification shall be transmitted to ANSI using the Project Initiation Notification System (PINS) form, or its equivalent, for listing in *Standards Action*. A statement shall be submitted and published as part of the PINS announcement that should include:

- (a) an explanation of the need for the project; and including, if it is the case, a statement of intent to submit the standard for consideration as an ISO, IEC or ISO/IEC JTC-1 standard; and
- (b) identification of the stakeholders (e.g., telecom, consumer, medical, environmental, etc.) likely to be directly impacted by the standard. If the response to sub-section (b) changes substantively as the standard is developed, a revised PINS shall be submitted and published.

3.3.1.1 PINS Exceptions

A PINS form may be submitted, but is not required, at the initiation of a project to reaffirm or withdraw an ANS. Comments received in connection with a PINS announcement shall be handled in accordance with these procedures.

3.3.1.2 Assertions of conflict or duplication

If PLATO receives written comments within 30 days from the publication date of a PINS announcement in *Standards Action*, and said comments assert that a proposed standard duplicates or conflicts with an existing ANS or a candidate ANS that has been announced previously (or concurrently) 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 PLATO and the commenter and shall be concluded before PLATO may submit a draft standard for public review. If the deliberation does not take place within the 90-day period and PLATO can demonstrate that it has made a good faith effort to schedule and otherwise organize it, then PLATO 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.

3.3.1.3 PINS Deliberation Report

The outcome of a PINS deliberation shall be conveyed in writing (the "Deliberation Report") within 30 days after the conclusion of the deliberation by the developer to the commenter and to ANSI. Upon submission of the Deliberation Report, the developer may continue with the submission of the proposed standard for public review. If additional deliberations take place, they should not delay the submission of the proposed standard for public review, and an updated Deliberation Report shall be conveyed within 30 days after each deliberation. Any actions agreed upon from the deliberations shall be carried out in a reasonably timely manner, but normally should not exceed 90 days following the deliberation. Subsequently, the developer shall include all of the Deliberation Report(s) with the BSR-9 submittal to the ANSI Board of Standards Review (BSR) for consideration should the developer ultimately submit the subject standard to ANSI for approval. Stakeholders who were involved in the PINS deliberation process may also file separate Deliberation Report(s) with ANSI and the developer within 30 days after conclusion

of any deliberation for consideration by the BSR, if the standard is submitted to ANSI for approval.

3.3.2 Public Review

In addition, proposals for a new ANS and proposals to revise, reaffirm, or withdraw approval of an existing ANS 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 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 aforementioned options is applicable.

Such listing may be requested at any stage in the development of the proposal, at the option of PLATO, and may be concurrent with final balloting. However, any substantive change subsequently made in a proposed ANS requires listing of the change in *Standards Action*.

4 ANNOUNCEMENT OF CANVASS INITIATION

PLATO may request ANSI to announce an Initiation to Canvass on the PINS or BSR-8 form. This announcement shall include a statement that the canvass list is available upon request from PLATO, or alternately, a URL address where an electronic version of the canvass list is posted.

5 CONDUCT OF CANVASS

5.1 PLATO may begin to conduct the canvass ballot at any time but canvasees subsequently added to the canvass list shall have the same amount of time to respond as do the other canvasees.

5.2 PLATO shall transmit, at minimum, the following information to all canvasees and other interested parties so requesting unless PLATO has previously supplied this information:

- the purpose and intended application of the standard;
- a brief history and explanation of how the standard was developed;
- an explanation of ANSI's function and the use of the canvass procedure in the voluntary consensus standards system;
- a copy of the canvass list, consisting of the name, affiliation, and category of interest of each canvasee;
- a copy of the complete proposed ANS or the relevant portion under consideration when the canvasee has previously received the complete standard;
- official letter ballot(s) to all canvasees.

Upon request, PLATO shall provide to the canvasee a reasonable number of copies of the document being considered, to allow for a speedy determination of position by the canvasee. Should the document contain material that is not to be considered for approval as an ANS, such as an introduction or annex, a clear statement shall be included indicating those portions of the standard that are to be considered for approval by ANSI.

The ballot form used by PLATO shall provide opportunity for the canvasee to indicate its position, i.e., approve, object (with reasons), abstain (with comment), with the advice that, in order to receive consideration, objections must be accompanied by supporting written reasons and, where possible, proposals for a solution to the problem raised. At least one follow-up shall be sent ten days prior to the closing date to canvasees not responding. The canvass ballot may be closed at the end of thirty days or sooner if all canvasees have responded. An extension of up to sixty days shall be granted upon request from any canvasee giving a legitimate reason.

Those not on the canvass list who have a direct and material interest in the standard have an opportunity to participate in the review of the standard during the public review process, announced in *Standards Action*.

5.3 Approval of a new standard, revision, withdrawal, or reaffirmation of an existing standard, or an addendum to part or all of an existing standard, shall require approval by at least a majority of the canvass list and at least two-thirds of those voting, excluding abstentions.

5.4 Views and objections resulting from the canvass (5.2 and 5.3) shall be dealt with in accordance with clause 6.

6 DISPOSITION OF VIEWS AND OBJECTIONS

Prompt consideration shall be given to the written views and objections of all participants, including those commenting on either the PINS announcement or public comment listing in *Standards Action*.

Public review and consensus body comments

In connection with an objection articulated during a public comment period, or submitted in connection with a vote, an effort to resolve all expressed objections shall be made, and each objector shall be advised in writing (including electronic communications) of the disposition of the objection and the reasons therefor. If resolution is not achieved, the objector shall be informed in writing that an appeals process exists within procedures used by PLATO. In addition, each objection resulting from public review or submitted by a member of the consensus body, and which is not resolved must be reported to the Board of Standards Review.

When this process is completed in accordance with the written procedures of PLATO, PLATO may consider any comments received subsequent to the closing of the public review and comment period or shall consider them at the next review.

Consideration of negative votes accompanied by comments not related to the proposal under consideration, or negative votes without comments, is not required. The letter ballot shall state that negative votes must be accompanied by comments related to the proposal and that votes unaccompanied by such comments will be recorded as “negative without comments” without further notice to the voter. If comments not related to the proposal are submitted with a negative vote, the comments shall be documented and considered in the same manner as submittal of a new proposal. If clear instruction is provided on the ballot, and a negative vote unaccompanied by comments related to the proposal is received notwithstanding, the vote may be counted as a “negative without comment” for the purposes of establishing a quorum and reporting to ANSI. However, such votes (i.e., negative vote without comment or negative vote accompanied by comments not related to the proposal) shall not be factored into the numerical requirements for consensus.

Unresolved objections; attempts at resolution, and any substantive change (see Annex A of the *ANSI Essential Requirements*) made in a proposed ANS shall be reported to the consensus body in order to afford all members an opportunity to respond, reaffirm, or change their vote within 30 days. Substantive changes made in a proposed ANS shall be listed in *Standards Action*.

7 PLATO STANDARDS COMMITTEE QUORUM AND VOTING REQUIREMENTS

7.1 Quorum Requirements of PLATO Standards Committee Meetings

To conduct Standards Committee business during a meeting a quorum must be present. A quorum exists when 40% of the voting membership is present.

7.2 Voting Rules on Matters Unrelated to a Standards Action Vote

Voting on matters that are unrelated to a standards action vote shall require a vote of the simple majority of the PLATO Standards Committee membership present at a meeting or a simple majority of the full membership on matters issued for letter ballot, excluding abstentions.

7.3 Voting Rules on Matters Related to a Standards Action Vote

standards action votes, and issuance or revision of an official interpretation require affirmative votes of the simple majority of the PLATO Standards Committee membership and of at least two-thirds of those voting, excluding abstentions.

7.4 Voting Rules on Letter Ballots

The Chair, or the PLATO Standards Committee, may authorize a letter ballot to be issued on any matter. Actions of the PLATO Standards Committee conducted by letter ballot require approval by a simple majority of the voting membership of the committee, except on standards action votes, which shall meet the criteria specified in 6.3.

8 SUBMITTAL OF STANDARD

Upon completion of the procedures for canvass, for disposition of views and objections, and for appeals, the proposed standard may be submitted to ANSI for approval according to *ANSI Essential Requirements* Section I, Criteria for approval of an ANS.

9 WITHDRAWAL

Withdrawal of an ANSI/PLATO standard may proceed without a vote of the relevant consensus body by notifying ANSI who will announce the withdrawal in *Standards Action*.

10 DISCONTINUANCE OF A STANDARDS PROJECT

PLATO may decide to abandon the processing of a proposed new or revised ANS or portion thereof at its own discretion and without a vote of the relevant consensus body.

PLATO shall notify ANSI immediately of such actions which will be announced in *Standards Action*.

11 RELATED POLICIES OF PLATO

A. Interpretation Policy

No company member of PLATO, or any individual representative of such member, shall have the authority to issue an interpretation of a PLATO standard in the name of PLATO, and no company member or any individual representative of such member, shall represent to any person that he has the approval of PLATO to issue such an interpretation.

PLATO will, in appropriate cases, render formal interpretations. Formal interpretations shall be given in writing and the request for them shall also be in writing.

Requests for formal interpretations shall be made to the PLATO Standards Committee Chair. If, in the Chair's judgment, a formal interpretation is required, the Chair shall promptly draft a response and circulate it among all PLATO members who manufacture the product or participated in writing the Standard to which the interpretation relates. If a 75% approval in accordance with these procedures is not obtained, the PLATO Standards Committee Chair shall decline to issue the interpretation. If such approval is obtained, the Chair shall issue the interpretation(s) and send copies to all affected PLATO members and all known stakeholders and organizations that have adopted the Standard.

Complete records of matters pertaining to formal interpretations shall be maintained by PLATO in accordance with the records policy. Rendering of formal interpretations shall in no way be used to supplant the normal PLATO standard development activities.

B. Appeals Policy and Mechanism

An appeal of a PLATO standards action or inaction shall be solely based upon procedural grounds. When appeals are filed, the appellant shall demonstrate that PLATO Standards development procedures were not followed. Appeals arguments that are based on actions that took place in previous revision cycles will not be considered.

- a) Prior to a formal procedural appeal, there shall be an opportunity to informally resolve the concern. Upon receipt of a request for a formal procedural appeal, the Executive Committee of PLATO shall establish an appeals board whose purpose shall be to adjudicate the dispute. The appeals board shall be composed of at least five individuals, each of whom shall recognize the importance of according a fair and complete hearing and shall, in the opinion of the Executive Committee, possess the expertise required to participate meaningfully. To the extent practicable, the individuals selected to serve on the appeals board shall not have commercial interests implicated in the issues being appealed and each panel member shall certify that he or she is able to adjudicate impartially.
- b) The appeal board shall accept and consider procedural appeals by any interested party. The appealing party shall submit written materials in support of its position, including a proposal for resolving the dispute,

within twenty (20) days after serving the request for appeal. Responsive materials from any interested party shall be submitted within twenty (20) days thereafter. Any additional materials relevant to the appeal will be accepted only in the discretion of the appeals board.

- c) The burden of persuasion in the appeal shall rest with the party initiating the appeal. The decision of the appeals board shall be in writing, with a copy sent to all interested parties, and must be subscribed to by at least a majority of its members. If the appeals board rules in favor of the appealing party, the PLATO proposed ANS at issue shall be returned to the appropriate PLATO section for revisions consistent with the appeals board's decision. Thereafter, the standard, as revised, shall within sixty (60) days be voted upon as provided in Section 3 of these procedures. In the event that the consensus required by Section 3 is not achieved, the standard will be withdrawn from consideration.
- d) It is the express policy of PLATO to encourage the satisfactory resolution of disputes pursuant to these procedures.

C. Metric Policy

PLATO shall use SI (metric) units.

D. ANSI Patent Policy - Inclusion of Patents in American National Standards.

PLATO shall comply with the ANSI Patent Policy in the latest version of the *ANSI Essential Requirements*.

E. Commercial terms and conditions

PLATO shall comply with the ANSI Commercial Terms & Conditions Policy in the latest version of the *ANSI Essential Requirements*.

F. Records

Records concerning new, revised or reaffirmed an ASN shall be retained for five years or one complete standards cycle, whichever is longer. Records concerning a withdrawn ANS shall be maintained for five years from the date of withdrawal.

G. Antitrust Policy

PLATO Standards development activities shall be conducted in accordance with the ANSI Antitrust Policy given in the *ANSI Essential Requirements*.