



Optics and Electro-Optics
Standards Council

December 13, 2006
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This letter is the OEOSC response to the **American National Standards Institute Report of Mail-in Audit of Optics and Electro-Optics Standards Council ANSI-Accredited Standards Developer, July – August 2006**. The items below are excerpted from the above mentioned report. The OEOSC response follows each item.

7. Examination of Records and Documents

A. Review of Documentation Indicating Evidence of Consensus and Due Process.

...The first BSR-8 form was submitted but there was no copy in the documentation....

...A second BSR-9 form was submitted, but it was also returned for additional information (see Attachment G). There was no copy of this form in the documentation....

Copies of the BSR-8 and the BSR-9 forms were included in the web database, but at first the links to the documents were broken. After the auditor told me that the documents were missing, I fixed the links.

...The three users were now listed as producers. There was also no documentation to explain as to whether the members changed their interest category or whether the first BSR-9 form was in error....

The issue of *interest group* will be added to the January 21, 2007 agenda of the ASC OP meeting, so that participants can declare their interest using the new definitions

8. Development of Audit Findings, Recommendations and Comments:

B. The auditor reviewed the recommendations from the December 2001 regular audit of OEOSC and observed the following:

- vi) **2001 Audit Recommendation.** The auditor recommends that, in accordance with clause 1.2.2 of the *ANSI Procedures*, ASC OP take additional efforts to ensure that the committee is balanced and no interest category is more than half of the total. The auditor reviewed the current consensus body roster and found that there is only one

producer, two users, and four general interest members. In addition to being quite small, there is a clear imbalance of members.

2006 Audit Finding. Although the balance situation has tilted in the completely opposite direction, it is now out of balance with far too many producers versus either of the other two interest categories. This area still needs considerable effort and is not yet resolved.

The issue of balance has always been a problem with regards to the US optics industry. Many of the optics businesses are small concerns that sprang up during WW II to support the military effort. At that time, Bausch and Lomb and the Eastman Kodak Company worked with the military to develop military specifications that would govern the quality of rifle scopes, tank sites, cameras, e.t.c., shipped to the military. The smaller companies adopted those specifications and continue to use them to this day.

In the mid 1990s the military decided to get out of the specification business and asked industry to adopt voluntary commercial standards. OEOSC was created to manage the conversion of the old military optical specifications. OEOSC attempted to recruit broad representation on ASC OP through its connection with the Association of Precision Optics Manufacturers Association and the Center for Optics Manufacturing, which was part of the University of Rochester. When asked, the frequent response from these small optical businesses was that they do not have the resources to support the conversion of the military specifications. They said they must assume that whoever does the conversion knows what they are doing. As a result not many experts are available to do the work.

The optical technical topics covered by ASC OP correspond to the topics covered by ISO/TC 172/SC 1/WG 1 and WG 2. These two international working groups only have a total of 21 experts participating. One person could be considered an *industrial optics user*, nine have *general interest*, and 11 are *producers*. So the international standards committee is also out of balance according to the ANSI criterion. This is an international problem.

A News item continuously appears on the OEOSC web site that solicits participation by US experts from companies that are industrial users of optics.

The ANSI concern of balance will be placed on the agendas of both ANSI/OEOSC OP and OEOSC Board meetings in San Jose, CA on January 21, 2007. The decisions made at those meetings will be communicated to ANSI within two weeks after the meetings.

- viii. **2001 Audit Recommendation.** The auditor recommends that, in accordance with A5.5 of the *Model Procedures for Accredited Standards Committees* ASC OP maintain and update the ASC OP membership list and provide it to committee members at least once per year.

2006 Audit Finding. The auditor could find no evidence that the membership list was being provided to the members on an annual

basis. During the audit, OEOSC reported that they intend to maintain the membership roster on their web site. This item has not been addressed.

The *ASC OP Procedures for the Development and Coordination of American National Optical Standards* will be changed to document the current practice of permanently placing the membership roster on the OEOSC web site. Modification of the ASC OP Procedures will be placed on the agendas of both the ASC OP and OEOSC Board meetings on January 21, 2007. The procedures will be transmitted to ANSI within two weeks after they have been approved by OP and the Board

- C. The auditor found areas of non-compliance. The following findings and recommendations are made to address these non-compliances:
 - i) The auditor recommends that, in accordance with clause 4.1.3 of the *ANSI Essential Requirements*, OEOSC officially provide ANSI with their current operating procedures and, if the changes are considered by the ExSC to be substantive, the reaccreditation process shall be initiated. In reviewing the 2 May 2005 edition of the *Procedures for the Development and Coordination of American National Optical Standards*, the auditor found that they are not in compliance with the current edition of the *ANSI Essential Requirements*. The auditor also notes that these procedures were submitted to ANSI almost one year later on 27 April 2006. The auditor notes that several substantive changes have been proposed during the course of this audit and are included in the 14 July 2006 version. The auditor recommends that the new edition be completed after this audit and submitted to ANSI in a timely manner. OEOSC is required by clause 4.1.3 of the *ANSI Essential Requirements* to notify ANSI of any changes to procedures on record at ANSI. Further details regarding recommended procedural changes are included in Section 7 of this report and in several places in this section.

ASC OP and OEOSC will review recent edits to ASC OP Procedures at the ASC OP and OEOSC Board meetings on January 21, 2007. The approved revision of the procedures will be submitted to ANSI within two weeks after these meetings.

- ii) The auditor recommends that, in accordance with clauses 3.0 and 3.5 of the *ANSI Essential Requirements*, OEOSC document the Standards Interpretation Policy and provide ANSI with a copy. The primary purpose for providing an Interpretation Policy is to protect the accredited OEOSC from liability resulting from incorrect or improper interpretations. The establishment of a formal method by which interpretations are offered diminishes this risk of liability. The auditor considers the current information in clauses 3.1 d), 3.1 e), and 11.3, to be inadequate. Further details are contained in Section 7 of this report.

This section will be updated and presented for approval at the OP and OEOSC Board meetings on Sunday, January 21, 2007 meetings. The approved OP Procedures will be submitted to ANSI within two weeks of the meetings.

- iii) The auditor recommends that, in accordance with clauses 3.0 and 3.1

of the *ANSI Essential Requirements*, OEOSC either develop a patent policy or adopt clause 3.1 of the *ANSI Essential Requirements* as the OEOSC policy. The auditor notes that OEOSC has included a proposal in the 14 July 2006 edition of the Procedures for the Development and Coordination of American National Optical Standards. These new procedures should be submitted to ANSI for approval.

The revised OP Procedures will be presented for approval at the OP and OEOSC Board meetings on January 21, 2007 meetings. The approved OP Procedures will be submitted to ANSI withing two weeks of the meetings.

- iv) The auditor recommends that, in accordance with clauses 3.0 and 3.2 of the *ANSI Essential Requirements*, OEOSC document the Commercial Terms and Conditions Policy and provide ANSI with a copy. The auditor notes that OEOSC has included a proposal in the 14 July 2006 edition of the Procedures for the Development and Coordination of American National Optical Standards. These new procedures should be submitted to ANSI for approval. Further details are contained in Section 7 of this report.

The revised OP Procedures will be presented for approval at the OP and OEOSC Board meetings on January 21, 2007 meetings. The approved OP Procedures will be submitted to ANSI withing two weeks of the meetings.

- v) The auditor recommends that, in accordance with clause 5.1 of the, *Procedures for the Development and Coordination of American National Optical Standards* OEOSC take formal action to add to the membership of the consensus body, document such action, and advise the consensus body, as required by the operating procedures. The auditor found that in the case of one applicant from Pakistan, OEOSC is not handling membership requests in accordance with the accredited procedures. Further details are contained in Section 7C of this report.

OEOSC was unaware that foreign experts could be part of a US ASC. The person from Pakistan filled out the membership form on the OEOSC web site and checked boxes for both TAG and US committees. He was referred to his country's ISO contacts for ISO participation. OP will be informed that foreign experts can be welcomed.

- vi) The auditor recommends that, in accordance with clauses 1.2, 1.3, 2.2, 2.3, and 3.3 of the *ANSI Essential Requirements*, OEOSC keep accurate records of membership changes. The auditor noted that the consensus body changed significantly for this standard from the original BSR-9 form that was submitted to ANSI to the final BSR-9 form that was submitted. There was no documentation indicating what occurred to justify such a change in membership. Adequate monitoring of balance and participation requires an accurate and up-to-date list of members of the consensus body and associated membership records. Further details are contained in Sections 7A and 7C of this report.

Membership data is maintained in a master database, which covers the Board, the

TAG and OP. If someone changes any of his or her data, that change is made in the database. The only way to track previous states would be to create a new record for the person every time something changes. We will explore the ramifications of doing that.

I hope that the information provided in the response letter addresses the issues raised during the audit. If any further information is required, don't hesitate to contact me.

Regards,



Gene Kohlenberg
OEOSC

cc: David Aikens, Chairperson OEOSC (by e-mail)
Marla Dowell, Chairperson Elect (by e-mail)
Steven VanKerkhove, OP Chairperson (by e-mail)