

### Guidance on Standards Interpretations

A Standards Interpretation is important and extra sensitive topic to a Committee. The reason are as follows: (1) when a formal request for a Standards Interpretations is submitted to a SDO or Committee (such as ATIS/TMOG) it usually means that the entity that submitted the request has discovered an immediate and important issue to them and possibly to others (usually during their system development, deployment, or operations); (2) a Standards Interpretation request has the risk of being mishandled because of either a lack of knowledge regarding the consensus based and formal nature of a Standards Interpretation, or because of mistaking a formal Standards Interpretation with an informal standards clarification. *The information provided here is for guidance/information only with the intent to educate and raise the level of awareness regarding Standards Interpretations. Interested parties involved with a specific Standards Interpretation are expected to perform their own research and gain an understanding regarding proper procedures. Additional information regarding Standards Interpretations (and proper procedures) can be found in the Operating Procedures for ATIS Forums and Committees. Any questions or clarifications regarding Standards Interpretations (and proper procedures) should be directed to Committee leaders and/or the Secretariat (ATIS).*

#### **SUMMARY GUIDANCE**

The following is summary guidance/information on the topic of Standards Interpretations:

A Standards Interpretation is a formal interpretation statement by a SDO/Committee (e.g., ATIS/TMOG) in response to a formal interpretation request, regarding some specific aspect of a standard. In order to produce a formal Standards Interpretation, the interpretation must be approved as a formal Committee action via the Letter Ballot process.

#### **DETAILED GUIDANCE**

The following is detailed guidance/information on the topic of Standards Interpretations (with the required macro steps, *working backward*):

- A Standards Interpretation is a formal interpretation statement by a SDO/Committee (e.g., ATIS/TMOG) regarding some specific aspect of a standard. All formal Standards Interpretations regarding a standard are made available to all purchasers of the standard (of record) and to all future purchasers of the standard.
- To get a proposed Standards Interpretation formally approved, the proposed Standards Interpretation must be approved as a formal Committee action via the Letter Ballot process.
- To get a proposed Standards Interpretation formally Letter Balloted, the proposed Standards Interpretation must have consensus (for the proposed Letter Ballot) in the Subcommittee (e.g., TMOG-CLDR) or Task Force, and the Committee (e.g., TMOG). Thus, all of the normal/formal Committee operating procedures must take place (i.e., have an Issue, have an Issue champion, have formal meetings, etc.).
- To initiate the Standards Interpretation work in the Subcommittee/Committee, the Secretariat and/or Committee Chair must receive a formal (written) request for a Standards Interpretation regarding some specific aspect of a standard.

## SUPPORTING GUIDANCE – TO AVOID MISHANDLING

The following is supporting information regarding Standards Interpretations to avoid missteps and mishandling by the Committee, Subcommittee, Leaders, and the Members:

- To avoid inadvertent standards compliance analysis requests (that could be confused with a Standards Interpretation request): A Standards Interpretation request should be submitted in a generic manner (i.e., without reference to comparing a standard to a specific commercial product, development, deployment, configuration, operation, or situation). The Standards Interpretation requester can choose to include background information that is non-generic (e.g., product specific); but the statement regarding the specific Standards Interpretation request should still be generic. If non-generic information is included for background, then the submitter should understand that such information is subject to public disclosure. Generally, the Committee does *not* provide standards compliance analysis.
- To avoid mistaking a formal Standards Interpretation with an informal standards clarification and to avoid related mishandling: The difference between a formal Standards Interpretation and an informal standards clarification should be understood. An informal standards clarification (in response to a request) is a simple factual statement regarding the standard, or a factual cross-referencing of information contained in the standard or in the standards references (that are contained in the reference list of the standard). As an example, a clarification response could be: "See Section 7.1.3.4 for a clarification of the statement in Section 6.2.3.2." An informal standards clarification can be provided by the Secretariat, Committee Leaders, or Committee Members.
- Because of potential confusion and misinterpretations: The Committee and Subcommittee leaders should always follow formal procedures regarding the processing of ANS related Issues and Standards Interpretations. For example, a Chair should never provide what appears to be a formal (SDO/Committee) Standards Interpretation (in response to a request) that was *not* properly vetted and was *not* the result of an approved Committee Action via the Letter Ballot process.
- Because of potential confusion and misinterpretations: The Committee and Subcommittee leaders should be cautious regarding providing verbal "standards interpretation" opinions during a formal meeting under the following conditions: (1) where a formal Standards Interpretations request has *not* been submitted (especially where a request is expected or could soon be submitted); or (2) where the opinion is *not* directly related to an existing (or proposed) Issue with the intent of gaining consensus toward formal standards development or interpretation.
- Subcommittee/Committee participants are free to offer their opinion regarding standards interpretations. However, it is the duty for the Subcommittee/Committee Chair to be clear whether or not such a discussion has led to a consensus on a standards interpretation. Because of potential confusion and misinterpretations: It is reasonable for the Chair to *not* call for consensus (even if there could be consensus) after such a discussion under the following conditions: (1) where a formal Standards Interpretations request has *not* been submitted (especially where a request is expected or could soon be submitted); or (2) where the discussion is *not* directly related to an existing (or proposed) Issue with the intent of gaining consensus toward formal standards development or interpretation.