

From: [Dan Glucksman](#)
To: [Emily Bremer](#)
Subject: RE: Follow up todays" SBA meeting
Date: Tuesday, January 24, 2012 1:24:16 PM

Thank you. So, the IBR references have been sent to Congress already, right? If so, do you know which committees received the recommendations?

Thank you, again.

- Dan

From: Emily Bremer [mailto:ebremer@acus.gov]
Sent: Monday, January 23, 2012 4:22 PM
To: Dan Glucksman
Subject: RE: Follow up todays' SBA meeting

Dan,

Thank you for the follow-up. I really enjoyed the discussion at the roundtable and happy to answer your questions!

The Conference adopts recommendations twice a year—in Plenary sessions held in June and December. At our December 2011 Plenary, the membership adopted recommendations on Incorporation by Reference and International Regulatory Cooperation. You can find these recommendations and related info on our website at:

<http://www.acus.gov/research/the-conference-current-projects/incorporation-by-reference/>

and

<http://www.acus.gov/research/the-conference-current-projects/international-regulatory-cooperation/>

The recommendation that Congress pass a statute to address the updating challenge in incorporation by reference is paragraph 11 of the IBR Recommendation. The IRC recommendation is the one that addresses international harmonization of standards.

We are statutorily authorized to issue recommendations to Congress, the President, agencies, and the Judicial Conference. We have also historically issued recommendations to “the courts” more generally. These typically come in the form of, “the courts should interpret the APA [or other statute] to provide [x].”

All our committee meetings are open to the public and streamed online. We post dates and times as soon as we schedule meetings, and you can email RSVPs to comments@acus.gov. If you're just planning to watch the webcast, there's not need to RSVP. The easiest way to find the meetings you

are interested in is probably to go to the webpage for the relevant project. All the project pages can be reached via the links on this page:

<http://www.acus.gov/research/the-conference-current-projects/>

If you have any further questions, please don't hesitate to ask. I look forward to working with you in the future!

All the best,
Emily

From: Dan Glucksman [mailto:dglucksman@safetyequipment.org]
Sent: Friday, January 20, 2012 5:08 PM
To: Emily Bremer
Subject: Follow up todays' SBA meeting

Hi Emily,

Thanks for your comments at today's SBA meeting. ISEA is an ANSI-accredited SDO. ISEA members write standards for personal protective equipment, such as respirators, hardhats, high-visibility garments and the like. The attached document lists our standards and the standard committees on which ISEA is a member or an alternate.

Currently, OSHA has incorporate by reference ISEA's standards for hardhats (z89.1) and safety eyewear (z87.1)

I had a few other questions and didn't know if you'd have time to chat. Some questions we have include:

When might ACUS make its recommendations
To whom does ACUS make its recommendations

ISEA is also interested in ACUS' work on:

Statutory language to the Administration would provide to Congress to allow agencies to more easily update standards incorporated into regulations.
Harmonizing standards internationally. This is a key issue for ISEA. We are active certain ISO committees, technical committees and working groups.

In addition, if there are future ACUS meetings, ISEA would be pleased to attend.

Thank you.

- Dan Glucksman

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