

From: [Grove, Jeff](#)
To: [Emily Bremer](#)
Subject: RE: IBR
Date: Wednesday, July 20, 2011 4:44:54 PM

OK. See you then. Regards, Jeff

From: Emily Bremer [mailto:ebremer@acus.gov]
Sent: Wednesday, July 20, 2011 4:17 PM
To: Grove, Jeff
Subject: RE: IBR

Jeff,

Let's say 10 am on July 27, then. I think we should only need about an hour, and I look forward to it, too.

Thank you,
Emily

From: Grove, Jeff [mailto:jgrove@astm.org]
Sent: Wednesday, July 20, 2011 4:10 PM
To: Emily Bremer
Subject: RE: IBR

Dear Emily;

How about Wed, 27 July, anytime after 10 am? We are moving offices, but next week we will be located at 1850 M Street, Suite 1000. The suite is still under renovation and is marked as Underwriters Laboratories. If you have any trouble, please call me at 202-223-8505. Looking forward to it.

Regards, Jeff

Jeff Grove
VP - Global Policy & Industry Affairs
ASTM International
1828 L Street, NW, Suite 906
Washington, DC 20036
+1.202.223.8505
jgrove@astm.org

From: Emily Bremer [mailto:ebremer@acus.gov]
Sent: Wednesday, July 20, 2011 3:53 PM
To: Grove, Jeff
Subject: RE: IBR

Mr. Grove,

It's nice to meet you, if only electronically at this point. As Mr. Cooper may have explained, I'm working a project on incorporation by reference in federal regulation for the Administrative Conference. A general description of the scope of the project is available on our website:

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

I understand that this issue is, of course, very important to standards development organizations like ANSI and ASTM. Your viewpoint is thus essential to my research.

Might you have some time to get together and discuss the issues with me? I would be happy to come to your offices at your convenience. As of now, my schedule is flexible from tomorrow, Thursday, July 21 through next Friday, with the exceptions of 11:30 to 1 on Tuesday, July 26, and 9 am to noon on Thursday, July 28. Please just let me know what time would be most convenient for you.

I look forward to speaking with you.

Thank you,
Emily

From: Scott Cooper [mailto:SCooper@ansi.org]
Sent: Wednesday, July 20, 2011 1:45 PM
To: Emily Bremer; Jeff Grove
Subject: RE: IBR

Dear Emily,

Please let me introduce Jeff Grove of ASTM Int'l who would be pleased to discuss with you the Incorporation by Reference issue.

I think you will both enjoy the opportunity to converse.

Best
Scott

Scott Cooper

Vice President
Government Relations and Public Policy
American National Standards Institute
1899 L St, NW, 11th Floor
Washington, DC 20036
Office: 202-331-3610
Cell: 413-687-1788
scooper@ansi.org

From: Emily Bremer [mailto:ebremer@acus.gov]
Sent: Tuesday, July 19, 2011 5:56 PM

To: Scott Cooper
Subject: RE: IBR

Scott,

I would very much appreciate it if you would facilitate an introduction to some of the SDO folks. Thank you!

You may be interested to hear that I gave a presentation at the ICSP meeting today. It was very well received and generated some good, thoughtful feedback. The ICSP staff have also given me some SDO contact information, and I intend to reach out to those suggested contacts imminently.

Best,
Emily

From: Scott Cooper [mailto:SCooper@ansi.org]
Sent: Friday, July 15, 2011 4:45 PM
To: Emily Bremer
Subject: RE: IBR

Dear Emily,

Yes, it was a pleasure to spend some time today talking and to have the opportunity to walk through these issues.

I will come up with a list of SDO folks that should be of help to you, and if you like, I can facilitate the introduction.

I have also attached the letter I mentioned that we sent to OSHA on the issue of referencing updated standards.

I look forward to further discussions, and thanks again for the opportunity to participate in this project.

Best
Scott

Scott Cooper

Vice President
Government Relations and Public Policy
American National Standards Institute
1899 L St, NW, 11th Floor
Washington, DC 20036
Office: 202-331-3610
Cell: 413-687-1788
scooper@ansi.org

From: Emily Bremer [mailto:ebremer@acus.gov]
Sent: Friday, July 15, 2011 1:04 PM

To: Scott Cooper
Subject: IBR

Mr. Cooper,

Thank you again for meeting with me today. I enjoyed our conversation and found it very helpful.

As promised, attached is the report underlying ACUS Recommendation 78-4, “Federal Agency Interaction with Private Standard-Setting Organizations in Health and Safety Regulation.” I’ve also attached the text of the recommendation itself.

I would very interested to meet with folks from the standards setting organizations to discuss the incorporation by reference project and hear their views. Our website has some background information on the project, as well as a description of its scope:

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

The issues I’m researching include but are not limited to updating regulations that incorporate extrinsic materials by reference and ensuring adequate access to such incorporated materials, both during the rulemaking process and following promulgation of a regulation. I understand that different agencies and standard setting organizations have different needs and have taken different approaches to these issues. I’ve been interviewing agency personnel to get a handle on the issues from their perspective, but it’s crucial that I also understand and include in my report the perspectives of the various standard setting organizations.

To that end, if you could help me put together a meeting with representatives from a few of the organizations, I would be very appreciative. We can host a meeting here at ACUS, or I can come to another location if that’s more convenient.

If you need any more information from me, or have further suggestions for materials I should consider in my research, please don’t hesitate to contact me.

Thank you again!

Best,

Emily Schleicher Bremer | Attorney Advisor



ADMINISTRATIVE CONFERENCE
OF THE UNITED STATES

ADMINISTRATIVE CONFERENCE OF THE UNITED STATES
1120 20th St., NW Suite 706 South . Washington, DC 20036
(202) 480-2086 . ebremer@acus.gov . www.acus.gov