

From: [Scott Cooper](#)
To: [Emily Bremer](#)
Subject: RE: IBR
Date: Friday, July 15, 2011 4:44:48 PM
Attachments: [ANSI OSHA Letter 4-9-2008.pdf](#)

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

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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



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