

From: [Donald Purcell](#)
To: [Emily Bremer](#)
Subject: "Incorporation by Reference" Issue
Date: Monday, June 18, 2012 4:54:29 PM
Attachments: [US Standards Strategy \(2005\).pdf](#)
[OMB Memorandum on Transparency and Openness \(December 2009\).pdf](#)
[OMB Circular A-119 \(2 18 98\).doc](#)
[Strategic Standardization Overview \(May 16, 2012\).ppt](#)

Emily...I enjoyed talking with you. I am very interested in the issue of "incorporation by reference" that you will be presenting on at the SES conference in August. When your presentation is available I would appreciate receiving a copy.

I believe your work at ACUS and the Columbia Law School petition raises a number of important questions that must be addressed, in particular, having a government agency be responsible for making available to the public any private sector consensus standard incorporated by reference in a government regulation. I don't see how the process issues of "openness" and "transparency" can be observed without making available to the interested public a copy of the private sector consensus standard "incorporated by reference" into a government regulation.

Enclosed you will find a few documents from the class on *Strategic Standardization* that I teach at the Catholic University School of Engineering...these documents focus on "openness" and "transparency" as being critical to the private sector consensus development process...I would appreciate receiving a copy of any publically available ACUS reports on this issue.

To view information on my background, standards experience, presentations and articles, please visit my website <http://www.strategicstandards.com/>

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