Information Note — System of ISO/TC178 series of standards, Interpretations & Frequent Asked Questions (FAQ) procedures

Document d'Information — Système de la série des normes de l'ISO/TC178,
Procédures pour les interprétations et les questions fréquemment posées (FAQ)
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**Foreword**

Information Note 2 has been prepared by a Task Force of ISO/TC 178 “Lifts, escalators and moving walks”, the secretariat of which is held by AFNOR, and covers procedures for the following topics:

a) Submission of an interpretation request on any standard or document published by ISO/TC 178;

b) Answers to Frequently Asked Questions.

This is the first edition of Information Note 2.
Introduction

Information Note 2 explains the process for handling interpretations and answers to Frequently Asked Questions to be followed by ISO/TC 178.

The Lift Industry needs to be able to ask questions about published standards, in order to resolve issues which may arise due to ambiguous language or multiple interpretations of a particular clause. National Standards Bodies, Standards Development Organizations and some Regulatory Authorities have responded to this need by developing Interpretation processes to answer questions arising during the design, installation, certification or commissioning of lifts, escalators and moving walks.

ISO does not currently specify any procedures for accepting or responding to Interpretation requests for any of its standards or other documents. Hence, this document was developed to provide a process that TC 178 can follow in order to respond to requests from the Lift Industry, including manufacturers, installers, maintenance providers, consultants, certifying bodies and regulators. The procedures described in this document are very similar to existing procedures used by other Standards Development Organizations. The need for these procedures will become more necessary as ISO 8100-1 and ISO 8100-2 are adopted by Regulators, since the prescriptive requirements in those standards will become mandatory.

In addition, a Frequently Asked Questions (FAQs) process is described in order to help National standardization bodies and organizations having a liaison with ISO/TC 178 such as PALEA, ELA, etc. that need to raise questions for clarification of requirements in the ISO/TC 178 family of standards. This need may be similar to the need for Interpretation requests.
1 Procedure for interpretations

1.1 General

Interpretations are a practical way to give:

— Answers to questions regarding the understanding of clauses of the standards;

— Feedback to the ISO-Committee responsible for a standard regarding the practical experience in the use of a standard;

— Guidance for further development and improvement of standards following:
  — Experience, especially accidents and incidents;
  — Progress in technology;
  — The state of the art.

Interpretations do not have the same status as the standards to which they are related, but following an interpretation should provide confidence that the interested parties have correctly interpreted or applied the standard.

1.2 Request for interpretation

Requests for an interpretation may be submitted by the ISO-Members (National Standardization Body, NSB), or an organization having a liaison with ISO/TC178.

Requests for interpretation by individuals, a company or other organization will not be accepted by ISO/TC 178. Requests must be submitted through a NSB or an organization having a liaison with ISO/TC178 that has checked and endorsed the request. Also it has to be checked, if the same questions has already been replied to.

The request shall be sent unformatted or in Annex B format in English language to the secretariat of ISO/TC 178. The content of the request shall include:

— Identification of the standard (ISO 8100-...: date, clause/sub clause) to which the request is related;

— The question;

— The proposed response.

The request shall not contain any 1:1 wording or drawings of the standard. Reference shall be given to the relevant paragraphs and the request accordingly formulated.

NOTE Where the interpretation request turns into written question, it should follow the Frequently Asked Questions (FAQs) process described in § 2.

1.3 Handling of the request

1.3.1 General

The sequence of processing an Interpretation request is illustrated in Annex A. The request shall be submitted to the secretariat of ISO/TC 178 (see Annex A, Step 1).
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1.3.1.1 The secretariat of ISO/TC 178 has to check, if the same question has already been replied to. If not, it sends the request to the secretariat and convenor of the Group responsible for the standard in question, in the format shown in Annex B (see Annex A, Step 2). The original correspondence from the submitter should be attached to Annex B.

If the Group, responsible for this request, is disbanded the secretariat and the chairman of ISO/TC 178 decide, who will be responsible for handling the request. This can be either the chairman himself, another convenor or an expert with experience in this specific area.

TC 178 secretariat shall assign the interpretation an identification number.

Numbers of withdrawn interpretation requests will not be used for new interpretation requests.

1.3.1.2 The convenor of the Group responsible for the standard in question drafts a proposed answer taking into account the proposed answer of the interpretation request. The convenor may consult other experts for preparation of the answer proposal.

1.3.1.3 The Convenor’s proposed response is added to Annex B (see Annex A, Step 2). The completed request and response is circulated to the members of the Group responsible for the standard in question. The original correspondence from the submitter should also be circulated with Annex B.

See Annex A, Step 3.

1.3.1.4 The Group members send their comments on the response within 4 weeks to the secretariat of the Group responsible for the standard in question.

1.3.1.5 In the case of unanimous approval of the proposed response it becomes the interpretation proposal of the Group responsible for the standard in question.

In the case of non-unanimous approval of the proposed answer, the Group responsible for the standard in question deals with the matter further or in meeting(s) and formulates the interpretation proposal.

The interpretation proposal may contain suggestions for modifications (editorial or technical) of the standard in question. In this case an appropriate remark (e.g. “this will be taken into consideration at the next revision of the standard”) will be added to the answer.

1.3.1.6 The secretariat of the Group responsible for the standard in question sends the interpretation request with the proposed response (format, see Annex C) to the secretariat of ISO/TC 178 for approval by the ISO/TC 178 Members.


1.3.1.7 ISO/TC 178 Members give their approval within 2 months to the secretariat of ISO/TC 178.

Approval is provided for the interpretation proposal by using the formal vote procedures of ISO (which for committee internal ballot is currently two-thirds majority of the P-members of the TC in favour) and if approved, the proposal becomes the official interpretation response.

1.3.1.8 TC 178 secretariat will provide the response to the originator of the request.

The interpretation will be available by the secretariat of ISO/TC 178 until the official publication (see 1.4).

1.4 Publication of interpretations

Interpretations (for format, see Annex C) will be published on the Internet website of ISO/TC 178. See Annex A, Step 5.
Besides the lists of valid interpretations, tables set up in the orders of their numbers and in order of the clauses to which these interpretations are related will be included on the Internet website of ISO/TC 178.

2 Procedure for Frequently Asked Questions (FAQs) and Answers

In addition to the interpretation request process, there is a need to define a specific process when written questions sent to the TC 178 secretariat need an answer which cannot be considered as an interpretation of the requirements of a standard and thus should not follow the interpretation request process. Essentially the FAQ is about explaining the rationale for the requirements rather than application of the standard, which is an interpretation of the requirements.

The process described in Annex D aims to ease answering the questions and to minimize the time between question and answer as much as possible (with reasonable processing time). It also defines who are the persons responsible for providing the answer, approval and archiving.

The process also defines who or what kind of organizations are the appropriate channels for raising questions to TC 178.

2.1 Scope and characteristics of the FAQs process

The FAQ process applies to any question about standards, technical specifications or technical reports.

It does not apply for:

— Design approval of a product or safety components;
— Interpretation request.

NOTE Where the written question turns into an interpretation request, it should follow the interpretation request process described in § 1.

The language for communicating between the various stakeholders within the process shall be English.

The processing time for providing the answer should be one month maximum after the reception of the question by TC 178 secretariat.

2.2 Steps of the FAQs process

The process is composed of four steps (See Annex D):

2.2.1 Submitting question (Step 1)

The question shall be initiated by either a national standardization body (NSB) or an organization in liaison with TC 178. Both organisations shall filter the questions so as to check whether the answer to the question needs to be confirmed or amended by TC 178. Also it has to be checked, if the same questions has already been replied to.

The question shall be sent to TC 178 secretary. There is no specific form required.

2.2.2 Distributing question (Step 2)

TC 178 secretary, after checking if the same question have not already been replied to, shall:

— Acknowledge receipt of the question
— Dispatch the question to:
- TC 178 Chairman for information
- and relevant WG convenor for action

If the Group, responsible for this request, is disbanded the secretariat and the chairman of ISO/TC 178 decide, who will be responsible for handling the request. This can be either the chairman himself, another convenor or an expert with experience in this specific area.

2.2.3 Dealing with the question and preparing draft answer (Step 3)

WG convenor responsible for preparing and drafting the answer to the question should:

- Collect the opinions of the WG members or a group of experts of this WG.
- Survey:
  - all other TC 178/WG's convenors; and/or
  - a council of experts in the scope of the question, deemed appropriate by the convenor.

On the basis of exchange of emails, call conferences or any other means of communication, experts and convenors give their opinion to responsible WG convenor.

The responsible WG convenor prepares the answer and sends it to TC 178 secretary.

2.2.4 Endorsing the answer and sending it back to the requester (Step 4)

TC 178 secretary shall:

- send the question and the proposed answer back to TC 178 Chairman for endorsement;
- send the endorsed answer back to the requester (NSB or liaised organisation accordingly);
- Keep the requester's letter and the related answer within ISO/TC 178 archives system.

In addition, Frequently Asked Questions will be summarized in one document and be published and updated regularly on the ISO/TC 178 webpage.
Annex A

Flowchart of procedure for an interpretation

STEP 1
- Interpretation request to be sent to ISO/TC 178 Secretariat
- Secretariat of ISO/TC 178 completes Annex B

STEP 2
- Forward Annex B and submission to the secretariat and Convenor of the WG responsible
- Proposed Response and Comments of the convenor are added to Annex B
- Completed Annex B circulated to ISO/TC/WG for approval

STEP 3
- 4 week period
- Unanimous acceptance?
  - YES: Sent to ISO/TC 178 members for approval by TC secretariat
  - NO: ISO/TC/WG discuss the answer further by correspondence or in a meeting

STEP 4
- 2 month period
- YES: Response to the request originator Interpretation published by TC 178
- NO:

STEP 5
- Publication on the Internet website of ISO/TC 178
Annex B

Format of an interpretation request

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<thead>
<tr>
<th>ISO 810X-</th>
<th>INTERPRETATION REQUEST RELATED TO</th>
<th>ISO 810X-</th>
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<td>Standard:</td>
<td>Edition: Clause(s):</td>
<td>For study request (step 1) □</td>
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<td>ISO 810X-</td>
<td></td>
<td>For study (step 2) □</td>
</tr>
<tr>
<td>Key-word(s):</td>
<td></td>
<td>For comment (step 3) □</td>
</tr>
<tr>
<td></td>
<td></td>
<td>For TC 178 vote (step 4) □</td>
</tr>
</tbody>
</table>

QUESTION (a copy of the original submission is attached.)

PROPOSED RESPONSE

COMMENTS OF THE CONVENOR

Date of request: Date of answer in ISO/TC 178/……: Source:
Annex C

Format of an interpretation

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<th>ISO</th>
<th>INTERPRETATION RELATED TO</th>
<th>ISO 810X-</th>
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</table>

**QUESTION**

**INTERPRETATION**

Date of approval by ISO/TC 178 members:
Annex D

Flowchart of procedure for Frequently Asked Questions (FAQs)

STEP 1

Question from requester

A) Relevant NSB (Filtering)

B) Organisation in liaison with TC 178 (ELA, PALEA, etc.) (Filtering)

STEP 2

TC 178 Chairman for information

TC 178 secretariat

- Acknowledges receipt
- Checks with Chairman
- Sends to relevant WG convener

STEP 3

TC 178 chairman for endorsement

TC 178 Secretary for:
- sending answer back to submitter
- archiving question & answer

STEP 4

Answer to requester

TC 178 Secretary for: Relevant NSB or liaised organization with TC 178

Interpretation request?

YES

NO

Responsible WG convener

Council of experts (WG members or other convenors)

Additional experts where necessary