

Compiled 29-April-2004:

The IEEE-SA Standards Board policies and procedures for responding to interpretations can be found on the IEEE-SA Web site. The following are extracts of information that pertinent to the issue of interpretations or explanations (as advised by L. Gargiulo of IEEE-SA):

**IEEE-SA Standards Board Bylaws, section 5.5**

<http://standards.ieee.org/guides/bylaws/sect5.html#5.5>

**5.5 Interpretations**

While it is always the intent of standards-developing committees to use language that is so clear that it is unnecessary to explain or amplify the original intent of the committee, occasionally questions arise regarding the meaning of portions of standards as they relate to specific applications.

Questions relating to such interpretations require review and evaluation by a balance of committee interests. No single officer or member of an IEEE Sponsor or subgroup thereof shall provide a written or verbal opinion concerning any portion of the text of an IEEE standards document or an American National Standard developed under IEEE secretariat, unless that opinion has first been subjected to consideration by an interpretations subgroup that represents all interested parties on the committee. The actions to be taken shall be as specified in subclause 5.9 of the IEEE-SA Standards Board Operations Manual.

**IEEE-SA Standards Board Operations Manual, section 5.9**

<http://standards.ieee.org/guides/opman/sect5.html#5.9>

**5.9 Interpretations and explanations**

Requests for interpretations shall be submitted or confirmed in writing to the Secretary of the IEEE-SA Standards Board, who shall forward the request to the appropriate Sponsor.

Upon receipt, the Sponsor shall screen all such requests to separate those that require formal interpretation from those requesting an explanation. An interpretation provides meaning to a clause, phrase, or sentence when it is open to more than one reading or is ambiguous. An explanation does not attempt to resolve ambiguities, but tries to elucidate the reasons for a particular concept or approach. The Sponsor shall notify the Secretary of the IEEE-SA Standards Board in writing, including electronic mail, preferably within 10 working days but no more than 30 days from the date of receipt of the request, of which classification has been assigned to the request.

The Secretary of the IEEE-SA Standards Board shall notify the requestor within 10 working days of the Sponsor's written notification of the classification of the request and the anticipated response date.

**5.9.1 Explanations process**

The Sponsor shall prepare explanations in the manner it deems practical and send them to the party initiating the request and to the Secretary of the IEEE-SA Standards Board. The correspondence shall clearly note that the request was considered to be an explanation only. The explanation shall be developed in a timely manner. A copy of the explanation shall be kept in the Sponsor's records for consideration in developing any revisions or amendments to the standard.

The Sponsor shall not be required to develop a response that in its estimation constitutes engineering application information that would normally be within the area of consultant services. The explanation will be made available to any other party who makes a request to review the explanation. A charge may be incurred for providing such a copy and is the responsibility of the review requestor.

**5.9.2 Interpretations process**

The Sponsor may forward requests for interpretation to a designated interpretations group.

The proposed response prepared by the designated interpretations group shall be approved by a majority of that group prior to submittal to the Sponsor.

Once accepted by the interpretations group, a vote on the proposed response shall be taken in accordance with Sponsor rules. As a courtesy, the preliminary response may be sent to the requestor. If the requestor submits comments on the preliminary response within 15 days of the date that the proposed interpretation is sent to the requestor, the Sponsor shall consider the comments and respond to the requestor. The proposed interpretation response shall be concluded within nine months of notification of classification of the interpretations request as an interpretation by the Sponsor.

The final interpretation shall be transmitted to the party initiating the request. A copy shall be forwarded to the Secretary of the IEEE-SA Standards Board, together with a list of the members of the designated interpretations group for IEEE records. IEEE Standards interpretations shall be posted at the IEEE Standards website until the next amendment or revision of the standard.

If the Sponsor is unable to reach consensus on an interpretation, the Sponsor can respond to the requestor that an interpretation will not be forthcoming on this matter. It should be noted that, if the Sponsor cannot issue an interpretation for a request, this area of the standard should be considered for revision.

Interpretations shall be developed in a timely fashion. If the Sponsor classifies the request as an interpretation, the Secretary of the IEEE-SA Standards Board shall provide a status report to the requestor no more than 90 days from the Sponsor's classification of the interpretation request as an interpretation. The Sponsor shall keep a log of all interpretations requested and completed. The Sponsor shall consider interpretations either as corrigenda, when developing an amendment to the standard, or for inclusion in the next revision of the standard.

#### 5.9.3 Disclaimer

Wording to this effect is included in each IEEE standard published:

"At lectures, symposia, seminars, or educational courses, an individual presenting information on IEEE standards shall make it clear that his or her views should be considered the personal views of that individual rather than the formal position, explanation, or interpretation of the IEEE."

When a proposed interpretation is sent to a requestor and a Sponsor, the following wording shall be attached:

"WARNING: This proposed interpretation is not an official IEEE Sponsor interpretation, as it has not yet been balloted and, as such, is subject to change. This proposed interpretation is for informative purposes only. USE AT YOUR OWN RISK."

## IEEE Standards Companion

<http://standards.ieee.org/guides/companion/part2.html#interpret>

### Interpretations

Once a standard is approved, its major technical development is complete. However, questions may arise concerning the language used in the standard, the intention or result meant by a particular action, etc. When a question of meaning like this arises, an individual can write to the Secretary of the IEEE-SA Standards Board asking for interpretation of the passage in question. This request is then forwarded to the sponsor for action. It is expected that a group will develop a response to the interpretation request and send it to the requestor (with a copy sent to the IEEE).

Often, however, someone may just be seeking an explanation of the reasons behind what the standard said, rather than an interpretation of the language itself. The Sponsor has the right to label an interpretation request as an explanation if it feels this is correct. The Sponsor can use whatever method it wants to issue an explanation and return that response to the requestor. The explanation should also be considered if the standard is revised or amended, as this may be an area of the standard that requires further clarification.

Completed interpretations are first made available at the IEEE Standards website. Interpretations must be completed nine months after any request was classified as an interpretation. They may be published with the standard they interpret, either bound in on the next printing or rolled into a collection of standards. In

some cases, the volume of interpretations being generated by a committee may be great enough to merit publication of a separate interpretations volume.

Interpretations are a unique form of commentary on the standard. They are not statements of what the standard should have done or meant to say. Interpretations cannot change the meaning of a standard as it currently stands. Even if the request points out an error in the standard, the interpretation cannot fix that error. The interpretation can suggest that this will be brought up for consideration in a revision or amendment (or, depending on the nature of the error, an errata sheet might be issued).

However, an interpretation has no authority to do any of this. It can only discuss, address, and clarify what the standard currently says. The challenge for the interpreters is to distinguish between their expertise on what “should be,” their interests in what they “would like the standard to be,” and what the standard says. Interpretations are often valuable, though, because the request will point out problems that might otherwise have gone unaddressed.

One of the reasons interpretations cannot change the standard is that they are not developed through an officially balanced consensus process, that is, a ballot. The interpretation request is handled by the sponsor through an interpretations group. This group can be the standing working group that developed the standard or it can be any of the members of the working group or balloting group who have expressed an interest in participating in the interpretations process, depending on the rules of the sponsor.

There is a requirement for balance in membership; it's probably best to follow the principles of balance that were used in balloting to establish balance in interpretations groups. Interpretations also have to be balloted in the Sponsor. But because this process doesn't meet the rules for approval of changes that are applied to an IEEE ballot, an interpretation cannot change the meaning of a document.

All working groups should be aware that they may be called upon to handle interpretations and come up with a process for doing so while they are still developing their standard. Level of participation in a working group is usually highest at this point, and it is important for working group members to be aware of this responsibility and prepare for their potential involvement. Remember, some groups receive no interpretations requests at all, while others receive many, so the group may have nothing to do or a great deal to do. The interpretations process you develop should be well known within your technical community so that anyone who wants to can participate. The procedure for submitting interpretations requests is published in the front of every IEEE standard.

Some possible answers to requests are shown in Annex C to give guidance on how to handle requests without altering the meaning of the standard. Interpretations are useful in indicating when a revision or an errata sheet might be necessary as well. And if the Sponsor feels it cannot issue an interpretation for a request, this is an area that clearly should be reconsidered when the standard is revised.

#### Some Guidelines for Interpretations

- 1) The standard is what it says. If the words are substantively wrong, then a corrective corrigenda via the balloting process is the correct response.
- 2) If the standard is ambiguous, then the interpretation must favor a looser requirement rather than a more restrictive one. Again, a corrective corrigenda can be initiated if needed.
- 3) If two parts of the standard contradict one another, then a rationale should be created and the IEEE errata process should be applied to correct the contradiction.

Many interpretations groups meet via phone or electronic mail, which avoids any travel requirements or significant time away from work.

# Annex C

## Interpretation Responses

Some *proforma* examples of responses for interpretation requests follow.

- 1) *The unambiguous situation*  
“The standard clearly states . . . , and users have to conform to this.”
- 2) *The “defect” situation (that is, if the standard appears to be wrong)*  
“The standard states . . . , and users have to conform to this. However, concerns have been raised about this that are being referred to the sponsor for possible action at the next revision.”
- 3) *The ambiguous situation*  
“The standard is unclear on this issue, and no distinction can be made between alternative implementations based on this. This is being referred to the sponsor for possible action at the next revision.”
- 4) *The unaddressed issue*  
“The standard does not speak to this issue, and as such no distinction can be made between alternative implementations based on this. This is being referred to the sponsor for possible action at the next revision.”
- 5) *Conditional interpretation based on other standard(s)*  
“The required behavior of this standard is dependent on the requirements of another standard. If the other standard requires *aaa*, then this standard requires *bbb*. But if the other standard requires *ccc*, then this standard requires *ddd*. A request for interpretation of the other standard is being forwarded to its developing committee.”
- 6) *Substantially identical to a previous interpretation*  
“This request is substantially identical to interpretation #*nnn*, and the resolution of that interpretation applies in this case.”
- 7) *Substantially identical to prior request, but with critical new perspective*  
“This request is substantially identical to interpretation #*nnn*; however, in considering <rationale> it appears that the previous interpretation should be superseded. The current interpretation for this situation (which does affect the previous conclusion) is . . . ”  
  
In this case, an attempt should be made to notify the previous requestor with the updated information.
- 8) *Request for interpretation of a different document or of a draft*  
“This request is for interpretation of *nnn*; the approved standard is IEEE Std *nnn*. The requestor is asked to resubmit this request if the question(s) are still pertinent to the approved IEEE standard.”
- 9) *Request is unclear (after attempt to contact requester for clarification)*  
“This request is not sufficiently clear to permit an appropriate interpretation. The requestor is asked to submit a rephrased or more specific request.”  
  
Some rationale, specific issue, or point of ambiguity should be addressed in the feedback to the requestor.
- 10) *Request is inappropriate*  
“This request is being returned to you because the questions asked do not constitute a request for interpretation but rather a request for consulting advice. Generally, an interpretation request is submitted when the wording of a specific clause or portion of a standard is ambiguous or incomplete. The request should state the two or more possible interpretations or the lack of completeness of the text. While you referred to clause *nnn*, you have not indicated any problem with the text. Please understand that it is beyond the scope of this committee/working group to provide consulting advice.”