

**REPORT OF THE INFORMATION LETTER
TASK FORCE
TO
SUBCOMMITTEE B**

December 9, 1993

BACKGROUND:

This task force was formed, at the direction of Chairman Duffey, to respond to concerns raised, at the July 1, 1993 meeting, regarding the application of the Information Letter system to Subcommittee B engine tests.

TASK FORCE MEMBERSHIP

Tom Franklin, Ch. D02.B0.01
Greg Guinther, Ch. D02.B0.01.03
Lee Scheimann, Ch. D02.B0.03
Johnny Kitchens, Ch. D02.B0.05
Rick Johnson, Member at Large
John Zalar, Administrator ASTM TMC

Advisor:
Earl Sullivan, ASTM Staff

ACTIVITY

The task force met once, October 20, 1993, with all members present or represented and one guest. Earl Sullivan provided background on, and some interpretation of, the Information Letter system and the task force prepared the following recommendations:

RECOMMENDATIONS:

1. That some education be given to Subcommittee B and the appropriate surveillance panels regarding the background and application of the Information Letter system. That education is documented as an attachment to this report.
2. That a role for the classification panel(s) be established in the Information Letter process. Specifically, the role of the Classification Panel is to review, for endorsement, those Information Letters which directly affect pass/fail limits. A response to a request for review should be given within two weeks.
3. That "controversial" Information Letters be classified as those which have a reasonable probability of drawing a **PERSUASIVE** negative within

Subcommittee B. Further, that the Test Monitoring System, give due consideration to balloting controversial Information Letters within SC-B prior to the effective date of the letter.

4. That Subcommittee B establish, as policy, that SURVEILLANCE PANEL MEMBERS:
 - Attend meetings on a regular basis
 - Maintain a technical understanding of the test
 - Be given, by their sponsoring companies, the authority to make technical judgments.
5. That effective dates for Information Letters be determined by the Test Monitoring System, but should not be earlier than the date of the decision to promulgate the letter. **(NO RETROACTIVITY!)**
6. That the timing of the Subcommittee B ballot be coordinated with the effective date of the Information Letter, such that, if the Information Letter effective date is contingent upon the specific approval of SC-B the ballot be initiated within two weeks of the decision to promulgate the letter. All other Information Letters to be balloted in the semi-annual block. In any case, all "controversial" Information Letter topics should be balloted separately.

by:



T. M. Franklin,
for the task force

ATTACHMENT

BACKGROUND OF THE INFORMATION LETTER SYSTEM

- Early on in the promulgation of engine test methods by Subcommittee B within ASTM, these methods were published as STPs (Special Technical Publications). This method of publication was adopted as it allowed timely updates and did not require the long, downstream voting process as is required for the publication of standards. As ASTM is a voluntary standards organization, concerns were raised with the use of STPs in commerce without the benefit of their having achieved an appropriate level of review and consensus within the society.
- In the mid 1970s an ASTM Program, The Test Monitoring System, was conceived by Subcommittee B and agreed by ASTM management. A document entitled, "REGULATIONS GOVERNING THE ASTM TEST MONITORING SYSTEM" was adopted after the operation of the TMC actually began and is in force today.
- In order to encourage Subcommittee B to advance their engine test methods to the status of an ASTM Standard Test Method, authority for the issuance of Information Letters was given by the Committee on Technical Committee Operations in 1984, as follows:

"COTCO recognizes that D-2 has a unique and complex situation. The use of Information Letters is approved providing each letter contains a disclaimer to the effect that such has not obtained ASTM consensus. These Information letters should be moved to such consensus as rapidly as possible."

This authority establishes a practical process for keeping those standards evergreen by the use of Information Letters. These would be validated for initiation by the Test Monitoring System and balloted, by Subcommittee B, for inclusion in a future revision of the pertinent standard. At the time of the standard revision, Committee D02 and Society ballots would also be required to validate the revision; however, once published and before becoming a part of a revision of the standard, the Information letters could be used in commerce, as though a part of the standard, with the agreement of the parties concerned.

- **Key points:**
 1. The need for, and the technical validity of, Information Letters is established by the Test Monitoring System, according to its regulations. This has been established as a necessary condition for the successful operation of this ASTM Program.
 2. Information Letters are to be balloted in Subcommittee B as a necessary step for their inclusion in a future revision of the applicable standard. This balloting process should not affect either the need for, or technical validity of, an Information Letter prior to the conclusion of the ballot process.

THE BALLOTING PROCESS

- **Within a surveillance panel**

The surveillance panel has the stature of a "task group" within the ASTM Regulations. As such, it is free to determine its own rules for operation and voting. As most of the surveillance panels operate according to an abbreviated version of Robert's Rules of Order, a simple plurality can be enough to move an issue forward. This plurality can be achieved by voice vote, hand count or, if demanded by a voting member, by roll call vote ("vote of record"). On issues which must also receive the balloted support of the section or subcommittee, however, most of the surveillance panel chairpersons have insisted upon unanimous, or nearly unanimous, agreement within the surveillance panel.
- **Within Subcommittee B**

As a balanced membership unit in the ASTM standards balloting process, SC-B operates under certain regulations for its balloting process. These are highlighted as follows:

 1. A valid letter ballot is one which receives a return from 60%, minimum, of its voting members. All APPROVE, DISAPPROVE or ABSTAIN returns count toward the 60%
 2. A positive letter ballot is one which receives an APPROVE count which is at least 2/3 of the total of APPROVE plus DISAPPROVE returns.
 3. On a positive letter ballot which receives one or more DISAPPROVE returns, all DISAPPROVE ballots must be reviewed and acted upon:

- The respondent is convinced to change his response to APPROVE or ABSTAIN.
- The subcommittee, by a 2/3 majority, declares the DISAPPROVE ballot response to be non-persuasive. This action can be taken with a hand count vote at a meeting of the subcommittee or through a letter ballot process. In either case the reason for the non-persuasive decision is to be documented.

4. Timing:

- Voting members are to be given 30 days in which to act upon their ballot, i.e. 30 days from ballot mailing to closure date
- Ballot closure occurs on the stated closing date or when a 60% return is achieved, whichever occurs last.
- A ballot is considered approved
 - a) Upon closure if there are no DISAPPROVE ballots at that time.
 - b) Upon review and action on all of the DISAPPROVE ballots, either by withdrawal or by being declared non-persuasive.

Points from
REGULATIONS GOVERNING THE
ASTM TEST MONITORING SYSTEM

(dated 2-14-86)

ARTICLE 2 - PURPOSE

- 2.1 The purpose of the System is to establish, maintain and operate an independent referencing system to assure that all tests performed using the lubricant test procedures published by ASTM and which are under the jurisdiction of ASTM Subcommittee D02.B0 are conducted in a valid manner so that they can be interpreted properly. The System shall be restricted to monitoring only tests assigned to it by ASTM Subcommittee D02.B0.

ARTICLE 6 - ADMINISTRATOR

- 6.3 The Administrator shall operate a Test Monitoring Center which shall:
- 6.3.9 In cooperation with the Test Developers and Surveillance Panels maintain a system for disseminating new information concerning the test procedures referenced in Paragraph 2.1.