

NATIONAL BUREAU OF STANDARDS REPORT

No. 6227

AMERICAN STANDARDS ASSOCIATION, INC.

**Its Functions, History, and Relation to the Department
of Commerce and to the National Bureau of Standards**

by

Hazel S. Snider

**Study Paper for the Information of
the
National Bureau of Standards Staff**

October 1958



**U. S. DEPARTMENT OF COMMERCE
NATIONAL BUREAU OF STANDARDS**

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NBS PROJECT

NBS REPORT

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U. S. DEPARTMENT OF COMMERCE
NATIONAL BUREAU OF STANDARDS

C O N T E N T S

	<u>Page</u>
I. Introduction	1
II. Functions of the ASA	1
III. History of the ASA	2
IV. International Cooperation	7
V. Organizational Structure of the ASA	9
VI. Methods of Developing American Standards	10
VII. Relation of the Department of Commerce and the NBS to the ASA	11
VIII. Present Participation of the NBS in the ASA	12

APPENDIXES

	<u>Page</u>
1. Approval by the Department of Commerce of the Revised Constitution of the American Engineering Standards Committee	14
2. Discontinuation of Commercial Standardization by the Department of Commerce and transfer to the American Standards Association	15
3. Carroll Wilson Report	16
4. First Report of the Policy Committee on Standards	21
a. Letter of Transmittal	22
b. Text of Report	23
c. Supporting Memorandum	25
5. Acceptance of Report by the Department of Commerce	28
6. Acceptance of Report by the American Standards Association	31
7. Final Report of the Policy Committee on Standards	33
8. Withdrawal of the Department of Commerce from the American Standards Association	36
9. Attendance by Representatives of the Department of Commerce on the Standards Council	37

AMERICAN STANDARDS ASSOCIATION, INC.

Its Functions, History, and Relation to the Department of Commerce and the National Bureau of Standards

by Hazel S. Snider

I. Introduction

This study paper has been prepared to acquaint members of the Bureau staff with the American Standards Association (ASA), which occupies a central position in domestic standardization and speaks unofficially for the United States in international standardization. The ASA is concerned primarily with standards of practice such as codes and specifications as distinguished from the national standards of measurement which are the primary concern of the Bureau.

The United States Government leaves to private initiative many standardizing activities that in other countries are conducted by the government. However, various Federal agencies participate actively in the technical work of ASA. In the case of the National Bureau of Standards (NBS) this participation is authorized by the fourth function stated as follows in the organic act:

"Cooperation with other governmental agencies and with private organizations in the establishment of standard practices, incorporated in codes and specifications."

As will be discussed subsequently, many members of the Bureau staff serve on technical committees of ASA, and a number of them have been designated by ASA as leaders or members of the United States delegations to international meetings.

II. Functions of ASA

The ASA is an incorporated body of technical societies, trade and business associations, professional organizations, and consumers groups. ASA has been established as the correlating agency through which standards can be cleared or, if desired, can be developed. The ASA's only activities relate directly to standardization; stimulating their development and use, providing a framework within which such development may take place both nationally and internationally, and serving as a clearinghouse for information concerning them.

The functions of ASA, as defined in the Constitution of that Association, are as follows:

1. "To provide systematic means by which organizations concerned with standardization work may cooperate in establishing American Standards, to the end that duplication of work and the promulgation of conflicting standards may be avoided.
2. "To stimulate the work of existing committees and other organizations competent to formulate standards suitable for approval as American Standards, and to bring about the establishment of committees or organizations for this purpose where they do not already exist, but not to formulate standards.
3. "To serve as a clearinghouse for information on standardization work in the United States and foreign countries.
4. "To further the standardization movement as a means of advancing national economy and to promote a knowledge of and the use of approved standards.
5. "To act as the authoritative American channel in international cooperation in standardization work, except in those fields adequately provided for by existing international organizations."

III. History of ASA

ASA has developed over a period of about 40 years to its present position as the central coordinating organization for standards in the United States. This development has come about in response to a need for coordination outside of Government that was not otherwise being met.

The ASA is an outgrowth of the American Engineering Standards Committee (AESC) which was organized in 1918 by a group of 15 business executives representing the country's leading engineering societies-- American Society of Civil Engineers, American Institute of Mining Engineers, American Society of Mechanical Engineers, American Institute of Electrical Engineers, and the American Society for Testing Materials.

The AESC voted to invite the Bureau of Standards, the War Department, and the Navy Department to accept membership on an equal basis with the founding societies at a meeting on May 4, 1918. The

invitations were delivered in person by the chairman of the AESC and were cordially received by the Secretary of Commerce, Secretary of War, and Secretary of the Navy. At a meeting of the AESC on May 17, 1919, representatives of the Bureau of Standards, the Navy Department, and the War Department were present for the first time. The first major participation by Government in standards activities of the AESC was in the development of safety standards.

During World War I the U. S. Government for the first time gave detailed attention to the prevention of accidents in its own industrial plants, such as the arsenals and navy yards. Safety engineers were appointed, and these safety engineers set up an informal organization for cooperation in their own work. The NBS was called upon by them to assist in formulating a series of safety standards for application in the Government establishments.

The National Safety Council suggested that similar standards should be formulated for general use throughout the country. This suggestion was made as a result of a survey conducted by the Council which demonstrated the great hodgepodge of rules, regulations and safe practice recommendations that existed throughout the country as developed by Federal agencies, State regulatory bodies, insurance groups, trade associations, technical societies, and other organizations. An interest was shown in this idea by all those concerned with accident prevention and especially by the various State commissions concerned with factory inspection and with the general safety of workers. Realizing the importance of safety codes prepared upon a national basis, and as a result of demands for extension of its previous work, the Bureau called a preliminary conference on this subject at Washington in January 1919 and a second conference in December of the same year. At these conferences the need for national codes was generally recognized and the best method for preparing them was given full consideration. It was finally agreed that the scheme of procedure in establishing national standards which had recently been inaugurated by the AESC would be the most satisfactory to utilize in the preparation of safety codes.

This brought up the question of whether the AESC was sufficiently representative to serve in such capacity; and, after a discussion within the committee and between it and a limited number of representatives of other interests--which discussion continued for three months--the committee prepared a revision of its constitution that provided for a broadening of its membership and functions. The Department of Commerce gave its approval of the revised constitution (See Appendix 1). All the technical societies, trade associations, professional groups, private companies, and governmental bodies that were interested in national standards were invited to join the AESC. Its mission was now to act as the national clearinghouse for standards. Its function was to simplify the development of standards; to eliminate duplication and variation of standards; and to weld conflicting standards into a single, generally accepted standard designated as "American Standard."

The Washington conference, called by the Bureau of Standards at its second session on December 8, 1919, requested the AESC to ask the National Bureau of Standards, the International Association of Industrial Accident Boards and Commissions (IAIABC), and the National Safety Council to organize the National Safety Code Committee, later designated as the Safety Code Correlating Committee (now the Safety Standards Board). The NSCC's first report included a list of 37 safety codes which were considered of the most immediate importance, and for which sponsor bodies were recommended.

As a result of the expanded activity in safety and other fields, the structure of AESC was changed in 1928 from a committee to a full-fledged association. A Board of Directors was created to handle administration policy and finance. A Standards Council representing all member organizations was established to supervise the technical activities. The name was changed to American Standards Association.

In 1933 the Government's economy program necessitated the curtailment of certain activities theretofore carried on by NBS. Most of the work which the Bureau had done in the field of simplification, commercial standards, and safety codes had been conducted in cooperation with ASA, the scope of whose activities had been enlarged from time to time to cover activities of the type being carried on by the Bureau.

At a Conference on Simplified Practice, Commercial Standards, and Safety Codes, held at the Department of Commerce in October 1933, Secretary Roper emphasized the proper relationship which Government should have to business in giving all the aid possible but not doing for industry what it can do for itself. It was explained that the Economy Committee, when examining the budget of NBS, had concluded that this work was of the sort which industry could carry on by its own efforts, and it was felt that ASA should be invited to help carry on this work (See Appendix 2). In 1934 preliminary arrangements were made for the transfer of the work of the Building and Plumbing Code Committee to the ASA. At that time the Washington office of the ASA was established at NBS to facilitate the cooperative work of the two organizations.

The Bureau retained a skeleton organization of the Divisions of Simplified Practice, Trade Standards, Commercial Standards, Building and Housing, and the Safety Standards Section. These units were slowly rebuilt as the depression passed. Their work was coordinated with ASA.

In 1942 a contract was signed by ASA with Government to develop War Standards for WPB and OPA. In addition, the ASA was active on behalf of other governmental departments in developing War Standards--e.g., Photographic Exposure Guide, prepared at the request of the U. S. Army and Navy, which was used on all military ships and planes photographically equipped.

The Secretary of Commerce, through the Visiting Committee of NBS, invited representatives of industry to attend a "Conference on Standardization" on January 12, 1945, to consider a report entitled "Standards in Commerce--A Basis for Action" (Appendix 3). This report was submitted to the Secretary by Carroll L. Wilson, a consultant to the Secretary.

The report pointed out the need for development of performance standards for consumer goods and the need for a single private body to serve as a focal point of leadership in standards development. The principal recommendations in the report were as follows:

1. The Department should foster active collaboration by its agencies with private standardizing activities.
2. The Commercial Standards and Simplified Practice Divisions should be transferred from NBS to the Department of Commerce, and
3. The complete rebuilding of ASA into a new, exclusively private standards body, capable of dealing effectively with both industrial and consumer standards.

The Conference endorsed the report. It also noted with approval the steps taken by ASA to broaden the scope of its work so that it might deal with standards in any field deserving national recognition. The Conference recommended that the Secretary of Commerce appoint a Policy Committee of industrial executives to advise with the President of the ASA regarding steps to effectuate recommendations made at the Conference. The documents pertaining to the activities of the Policy Committee on Standards are given in Appendixes 4, 5, 6 and 7.

A Policy Committee, chairmaned by Mr. Charles E. Wilson, recommended that (1) the Divisions of Simplified Practice and Trade Standards be transferred from NBS to a more suitable location elsewhere in the Department, and that NBS plan for a continuation of research in the field of standards and for future development of needed testing methods; and (2) that the Department withdraw from the field of initiating and publishing standards which are voluntarily agreed to by industry groups as soon as the ASA "implements itself for such functions."

Secretary Wallace's letter accepting the report of the Policy Committee set forth his plans for transferring the two divisions from NBS to the Department. The functions of the transferred divisions would be:

1. To sponsor and perform basic research in the economic and marketing fields for the ASA and other groups and organizations engaged in formulating voluntary standards or desiring to initiate standards;
2. Act as sponsor for groups in proposing standards to the ASA for issuance as American Standards;
3. Retain the Department's present function of initiating and proposing to the ASA or to any other groups the development of voluntary standards where the Department finds on the basis of economic studies that such standards would be desirable in the public interest; and
4. Retain the function of publishing a voluntary standard developed by a group if that group requests the Department to publish. Such standards would clearly indicate the industry or other group or groups on whose behalf the Department is publishing.

Secretary Wallace further explained that the Department does not wish to compete with, or to duplicate, the services which private organizations can provide equally well, but that the Department cannot properly close the door to industry and other economic groups which request the direct assistance of the Department in developing and in publishing voluntary standards on their behalf. "However, to the extent that the American Standards Association reorganizes its procedures in accordance with the recommendation of your Committee so that it can perform trade standard services to the satisfaction of all the groups with an interest in standards, the Department is prepared to encourage the use of the facilities of the ASA for the initiation, development, and publication of standards."

Secretary Wallace asked the Policy Committee on Standards to continue to function as an advisory group to him and to the Department. He suggested also that a joint conference committee of the ASA and the Department be set up to help promote the wider use of voluntary standards covering the entire field of standards--the scientific, technical, and testing aspects as well as the economic, marketing, and trade aspects of the problem.

Such a joint committee was established consisting of the following membership: (1) from the Department of Commerce -- Dr. E. U. Condon, Director; Mr. Philip M. Hauser, Director, Office of Program Planning; Mr. Harold Young, Solicitor; and a representative from the Office of Domestic Commerce; (2) from the ASA -- Mr. Howard Coonley, Chairman, Executive Committee; Mr. H. S. Osborne, Past Chairman, Standards Council and Member of the Board of Directors; Mr. P. G. Agnew, Vice President and Secretary; and Mr. Cyril Ainsworth, Technical Director and Assistant Secretary.

At the first meeting of this committee it was agreed that the Department of Commerce and the ASA should cooperate in the development of a national program which will bring the widest benefits in the shortest period of time. The ASA was requested to present some concrete proposals as to how the Department could help to further the program.

A first draft of proposals was prepared dealing with the need for investigation and research. However, before these proposals were developed in final form, the work of the Joint Committee was interrupted by a change in the administration of the Department of Commerce. A further complication was the incorporation of ASA under the laws of the State of New York. This appears to have been under consideration for some time before it was consummated in 1948.

As a result of the incorporation, the Department of Commerce (along with other Government member-bodies) withdrew from active participation in the administrative affairs of the Association because at the time question was raised by the solicitors for the various departments concerned, including the Department of Justice, as to the propriety of membership by Government in private organizations in the absence of specific statutory authority (Appendix 8).

IV. International Cooperation

The American Standards Association acts as an authoritative American channel of cooperation in international standardization matters. It makes available to American industry information on the standardization work of foreign countries. It promotes a knowledge of American Standards in foreign countries. The ASA maintains a library of standards of which the foreign standards comprise those of 43 nations, and maintains exchanges with 39 fellow members in the ISO and also with certain groups such as IRAM in Argentina, UNIT in Uruguay, the Chinese National Bureau in Taiwan.

International Standards Association (ISA) - The international activities of the ISA have involved cooperation with other national standardizing bodies both directly and through the ISA--founded in 1926--which at the beginning of the war comprised the national standardizing bodies of 22 countries. Through the activities of the ISA agreement was achieved on a number of important standards of interest to American industry--e.g., motion picture film, ball bearings, etc. The ISA was inactive during the war.

United National Standards Coordinating Committee (UNSCC) - In 1944 the UNSCC was set up for a period of two years upon the initiative of the United States, Canada, and Great Britain in order "To promote the maximum possible coordination and unification of standards necessary for the war effort and the immediate post-war period." The national standardizing bodies of 15 nations were members.

At a meeting in New York in October 1945 the UNSCC took the first step in setting up a permanent international standards organization to carry forward the work of the UNSCC and the old ISA. It was felt that in the post-war world, the international aspects of standards were going to be of far greater importance than formerly, and that, accordingly, the permanent institution must be more strongly organized and more amply financed and staffed than was the old ISA.

International Organization for Standardization (ISO) - The ISO was founded in 1946, an outgrowth of the UNSCC and the ISA. The ISO is one of the world's clearinghouses for the development and promotion of international standards. Through ISO the national standardizing bodies of 40 countries coordinate their standards in the interest of improving international trade. The technical work of the ISO is carried on by technical committees made up of a delegation from each of the member-bodies wishing to take part in the work of the committee. The United States member of ISO is the ASA which seeks to establish an American viewpoint for presentation in discussions where international standards are chosen, established, and approved. The Managing Director of ASA was elected Vice President of ISO in June 1958.

The ISO holds consultative status as a non-governmental organization with the Economic and Social Council of the United Nations.

International Electrotechnical Commission (IEC) - The IEC was organized in St. Louis in 1904 and has functioned since that time as the international standardizing body for the electrical and related industries. The IEC affiliated itself with the ISO in 1947 as a technical division.

United States interest in the work of the IEC is represented by the U. S. National Committee of IEC, which is an arm of the ASA.

As a result of more than 50 years of work by IEC committees, many electrotechnical units, quantities, symbols, and terms have been made uniform throughout many countries of the world. Uniform test methods and standards of dimensions, properties, performance, and safety have been developed for many kinds of electric equipment.

Inter-American Cooperation - The Inter-American Department of ASA was formed late in 1942, the primary objective of which was close collaboration with the standardizing bodies in other American Republics.

V. Organizational Structure of ASA

The ASA's ultimate authority stems from member-bodies. There are two other types of memberships--Honorary Members and Sustaining Members, as provided for in the By-Laws. The principal organs of the organization are the Board of Directors and the Standards Council. The Board of Directors handles the general policy, administrative, and financial affairs of the ASA. Its members are elected upon nomination by selected member-bodies. The Standards Council, made up of representatives from each of the member-bodies, has jurisdiction over procedures in the development of standards and their approval. Serving in an advisory capacity to the Standards Council are the Standard Boards, which on behalf of the Standards Council approve the initiation of projects, their scopes and sponsors, approve the personnel of sectional committees, and make recommendations on approval of standards to the Board of Review. The latter is a group of six members of the Council elected annually to act on behalf of the Council on approval of standards. The standards boards also supervise the work of the various sectional committees in their fields. It is in these sectional committees, where all groups interested are represented, that most of the technical work of the Association is handled. Many of the committees concerned with the development of definite standards operate under the procedure of the ASA, but they are usually sponsored by one or more ASA member-bodies or other national organizations.

VI. Methods of Developing American Standards

An American Standard is one of national application approved by the American Standards Association as having been accepted by all groups and organizations substantially concerned with its scope and provision, and is one which has a national standing.

As a matter of convenience in record keeping and to make American Standards easily referenced by those who use them, each standard approved by the ASA is assigned an ASA number. These are identification numbers only. When the ASA finds that a standard prepared by a committee under the sponsorship of the ASTM, for example, has been accepted by consensus of national groups of producers, users, and general interests that are concerned, that ASTM standard is granted approval as an "American Standard." It then receives an ASA number in addition to its ASTM number.

All American Standards are voluntarily arrived at by common consent and are available for voluntary use. They are subject to regular review, as a result of which they may be reaffirmed, revised, or withdrawn. Practically all types of standards of practice of national importance may be approved as American Standards, such as (1) definitions, terminology, symbols, and abbreviations; (2) standards for materials, performance characteristics, procedure, and methods of rating; (3) methods of testing and analysis; (4) standards of size, weight, volume, and rating; and (5) standards incorporated in codes such as those relating to safety, health, and building construction.

American Standards come into existence through four basic methods--(1) Sectional Committee Method, (2) Existing Standards Method, (3) General Acceptance Method, and (4) Proprietary Method.

Sectional Committee Method - The membership of sectional committees must be representative of all national groups and organizations substantially concerned with the scope of the standard project. The administration of a sectional committee is usually in the hands of one or more organizations known as sponsors. When a sectional committee has formulated a standard and the sponsor believes that consensus is obtained and considers the standard technically sound, the draft is submitted to the appropriate Standards Board for action. It either recommends that the Board of Review approve the standard as an American Standard, or it may return the standard to the sponsor indicating objections. When the Board of Review is satisfied that a consensus exists and that all other ASA rules and requirements are met, the standard is approved as an American Standard and published.

Existing Standards Method - An existing standard of any organization may be submitted to ASA for approval as an American Standard (1) if the standard is national in scope and recognition, (2) if it has been accepted by those substantially concerned with its scope and provisions, and (3) if the standard does not conflict with other standards in its field.

General Acceptance Method - This method is suitable for comparatively simple projects that do not require prolonged technical discussions. Standards are discussed and agreed upon only at a General Conference. Groups not represented at the conference, but substantially concerned with the scope and provisions of the standard proposed, can give their comments and vote in writing.

Proprietary Method - This method is applicable only in those cases for the revisions of standards which have been approved by the ASA. Any responsible body having a position of pre-eminent importance in the field of the standard may be designated as a sponsor for the development of revisions of the standard within its organization, such revisions to be submitted to the Association for approval.

VII. Relation of the Department of Commerce and the NBS to ASA

The policy of the Department of Commerce has been to work with other organizations toward the building up of a recognized national centralizing and coordinating agency for industrial standards.

Active membership of the Department of Commerce in the ASA dates from 1918, when the Department accepted an invitation to join the AESC with the standing of founder, until July 30, 1948, when the ASA was incorporated (Appendix 8). Prior to the incorporation, representatives of the Department served on the Standards Council, Board of Directors, and the Correlating Committees (now Standards Boards) with voting privileges. At the time the Department withdrew as a member-body of ASA, the chairman of the Standards Council was a representative of the Department of Commerce.

In 1952 Secretary Sawyer accepted the invitation from ASA for members of the Department to attend meetings of the Standards Council with the privilege of the floor (Appendixes 9a and 9b).

The ASA provides a technical Advisory Committee whose function is to advise the Director of the Bureau in specific technical areas. This Advisory Committee was appointed as a result of a recommendation made by the Ad Hoc Committee (Kelly Committee) for the Evaluation of the Functions and Operations of the Bureau in their report of October 1953.

Another important relation arises through the Department's work on Commercial Standards, and, to a less extent, on Simplified Practices. In the first of these, the Department lends its aid to individual industries in developing Commercial Standards for use in marketing their commodities. Simplified Practices have for their objective the elimination of unnecessary variety and the concentration of production on the most important items.

Upon completion of one of these voluntary standards of practice the Division of Commodity Standards suggests to the proponent group that they consider the further possible step of submitting their standard to the ASA for approval as an American Standard.

VIII. Present Participation of the NBS in ASA

Although Bureau employees may not serve in an administrative capacity with voting privileges, the Bureau is represented on approximately seven of the Standards Boards--Acoustical, Construction, Consumer Goods, Electrical, Materials and Testing, Nuclear, and Safety. A bureau staff member is one of the Department's two representatives on the Standards Council.

Bureau staff members serve on the technical committees of ASA as independent technical experts, thus giving the committees the benefit of their specialized knowledge and experience. In a number of cases where there has been an acute need of research in the work of technical committees, special funds have been raised by industry to support research work at the Bureau on these specialized problems. Bureau staff members serve on approximately 115 main technical committees of ASA, with a total committee membership of approximately 275. The Bureau holds the chairmanship of ten of the main committees and the secretaryship of eight.

Many Bureau staff members serve as ASA delegates to international meetings. Five such delegates attended the 1958 General Meeting of the IEC which was held in Sweden in July.

Among the ISO technical committee meetings which Bureau employees, as ASA delegates, have attended during the past several months are the following: plastics, textiles, rubber, photography, cinematography, screw threads, sieves, acoustics, small tools, and copper and copper alloys.

The Bureau is sole sponsor for seven ASA projects and is co-sponsor for six others. A sponsor assumes the administrative responsibility for the entire organization and work of the project. In the technical deliberations of the sectional committee formulating the standard, the sponsor has no greater voice than any of the other participating organizations. Sponsorships are assigned in recognition of leadership and competence in the particular fields involved.

- 14 -

October 29, 1919

Dear Sir:

1. The representatives of the Department of Commerce on the Engineering Standards Committee, Messrs. S. W. Stratton, E. B. Rosa and G. K. Burgess, have considered the revised Constitution and have informed me that it meets with their approval.

2. I, therefore, take pleasure in informing you that the Department of Commerce formally approves the proposed revision of the Constitution submitted with your letter of August 30, 1919.

3. I take this opportunity to express the most hearty desire of the Department Commerce to aid in all possible ways the objects of the American Engineering Standards Committee, and I can assure you of the cordial support of Doctor Stratton and the scientific and technical staff of the Bureau of Standards in furthering the work of the Committee for which I predict a most useful service to the country.

Yours very truly,

William C. Redfield
Secretary of Commerce

Prof. C. A. Adams, Chairman
American Engineering Standards Committee
29 West 39th Street
New York, New York

Mr. Howard Coonley
President, American Standards Association
New York, New York

My dear Mr. Coonley:

The Bureau of Standards is discontinuing most of the work which it has been carrying on in the field of simplification, commercial standards, safety codes, and building codes. This step, undertaken in the belief that these functions should be in the hands of industry and consumer groups, is being carried out as a part of the government economy program.

I am pleased that we shall be able to count on the American Standards Association to carry on the essentials of this work, which, as a result of our discussions, I now understand the Association will be prepared to do. Its experience and standing as the national clearing house for industrial standardization, and the cooperative methods which it has developed during the past 15 years fit it for the increased responsibilities and the enlarged program entailed. It is thus possible to conserve the results of these pioneering services to industry which the Bureau of Standards has developed during the last 12 years, and to further the national economy by carrying these services forward.

I can assure you that the full cooperation of the Bureau of Standards will at all times be available both in carrying through the transfer with a minimum of disruption of the work, and also in providing through the Bureau's facilities at least a part of the research work necessary in connection with standardization projects.

Sincerely yours,

July 10, 1933

Daniel C. Roper
Secretary of Commerce

Report presented by Carroll L. Wilson to the Secretary of Commerce, and approved in principle by the Conference on Standardization January 12

Standards development has been active in this country since the start of the century. Most of the work has been carried on under private initiative, through the efforts of several hundred business organizations and a much larger number of individual concerns. Many government agencies have also contributed, notably the Department of Agriculture, the Food and Drug Administration, and the National Bureau of Standards. The focal clearing house of private activity has been the American Standards Association (of which the Department of Commerce has long been a member). This body had its beginning in the first World War, which indeed gave a great lift to the whole movement, both here and abroad. The commercial work of the NBS likewise got its real start at that time.

Today the United States leads the standards world, thanks to the widespread interest and initiative applied by its citizens in this field during the past generation. In the basic arts of measurement the NBS appears to have achieved almost unique stature. But in the application of standards to commerce, the actual achievements of both NBS and ASA seem to have fallen short of their opportunities. Such shortcomings had no very serious consequences while the commercial standards dealt with by these two organizations were confined largely to "industrial goods." But if standards are to be extended as aids to the ultimate consumer, a far more effective performance will be essential.

Current discussion of the standards movement and its future goes on in an atmosphere of intense controversy. As long as standardization was confined chiefly to industrial goods, the rivalry and contention appears to have been about what might normally be expected in any field of technical progress. But recent developments, in particular the work of the Office of Price Administration, have heavily emphasized the likelihood that standards may come to be applied extensively to consumer goods. This prospect has whetted the edge of old rivalries and injected new elements of controversy, bringing the subject almost to an explosive state. Under these conditions people interested in standards tend to fall into opposing camps. For example, many contend vigorously that only the government through the NBS can deal effectively with the consumer goods problem; others are just as insistent that the ASA is incomparably the better vehicle for leadership. The first propose that the Department withdraw from membership in the ASA; the second counter (in effect) with a proposed Congressional Charter for the ASA. This sort of personalized controversy confuses the real issues and obscures the constructive possibilities; it is emphatically rejected as a basis for this analysis.

The truly significant questions are these: How real and how extensive is the need for more active standards development? What kind of standards will be most in demand? How can the NBS and the Department contribute most effectively? What have other government agencies to offer? What specific contribution can a private clearing house such as the ASA be expected to make?

It is probable that the next two decades will bring a strong growth in consumers' demand for facts on the performance of things they buy. From this demand will come the need for many performance standards. To develop this and other new

consumer aids effectively, and to exploit the industrial goods area still untouched, will call for more intensive, more skillful cultivation of the whole standards field than has heretofore been applied. Only if the need were predominately for compulsory standards would there be a clear case for government to assume active leadership. But the great majority of standards in prospect involve no questions of health, personal safety, or protection of property. Accordingly, compulsory standards can legitimately play only a secondary part. Therefore, the public should look primarily to business rather than government, to evolve the performance data it will want. Likewise, standards development should follow the voluntary agreement process as its main channel. For this work the Department and the NBS (and also other government agencies) can provide facts, measurements, and technical assistance; these will be their best contributions.

The opportunities for more effective collaboration between the Department and private organizations are truly substantial. Light is shed on this by a glimpse at the processes of establishing a new standard--promotion or education, formulation, review, advance acceptance, compliance. Consider a performance standard for some consumer item; for example, the durability of shoes soles, or the accuracy of an alarm clock. Before there can be such a standard there must be an effective demand for performance data. Somebody has to sell the idea. Here the mail order houses have already taken the lead, because the facts help them sell goods. This practice will surely spread to other merchandising fields. It is not too clear that the Department can make any substantial contribution to this promotional work. There will be opportunities for consumer organizations to do pioneering, and for spreading knowledge about standards through the public school system.

The actual development of a specific standard rests on negotiation, to which the Department can contribute but little of intrinsic value. But this stage also, calls for facts, research on testing methods, market analysis; here the Department and the NBS have much to offer. The public acceptance of any standard will depend heavily on the rigor of the tests that it moots for adequacy and equity. If a "court of review" (such as the ASA Standards Council) is required, it should be judged by its own acts; the direct participation of any governmental agency here could distract attention from the actual quality of the "court's" performance and, conversely, could embarrass the government. Finally there are the advance acceptance and compliance stages. To the extent that these latter may be necessary in any given case, there is definite opportunity for the Department to contribute a point of registry, as well as statistics and other facts. In short, even such a brief review of the standardizing process suggests ample opportunities for collaboration.

One potent source of the current controversy is inherent in the prevailing standards concepts. These are unsuitable for application to most consumer goods. The most important are minimum standards, grade labeling, over-all specifications or "design" standards, and the "trade standards" fostered by the NBS. Of these the first three either ignore the competitive process or tend to hamper its operation. The "minimum standards" concept seeks to establish a definite level of quality below which competition is in effect to be treated as illegitimate. This concept is satisfactory where questions of health, safety, or property protection are involved; but there is no satisfactory basis for determining such a level where these criteria are missing, as is the case for most consumer goods.

Indeed, rigorous interpreters of prevailing anti-trust philosophy would rightly frown on this practice. The grade labeling approach is an effort to simplify quality and performance information; but if applied to any but the simplest type of product (such as canned vegetables?), it is inevitably misleading. The complete standard of design and workmanship (implicit in earlier proposals of the British Standards Institution?) is a grossly impractical attempt to pre-determine the complex matrix of qualities that make for general desirability. Finally, the NBS "trade standard" with its labeling provision is weak, in that it is not specifically designed to give the consumer adequate buying information.

A type of performance standard designed explicitly to implement the competitive process is proposed for consideration. The following example, deliberately oversimplified for the sake of clarity, will illustrate both how such a standard might be established and how it could be used as a tool in competition

Assume that a satisfactory test on men's business shirts has been devised, equivalent to actual laundry wear. Assume that performance under this test is expressible in simple terms easily grasped by the consumer--number of trips to the (standard) laundry. Let a sample check be taken of the average performance of all such shirts sold. Say this average wear comes out at 40 standard trips. Let this average be adopted as the "comparative standard," to be used at will as a target in competitive selling:

"Our Premium Brand shirt gives you 80 trips, yet it sells for only 50 cents more than typical prices for standard 40-trip shirts." "Our True-value shirt gives you only 30 trips; but you pay only half the usual price for the 40-trip standard article." "Mr. Main Street! Your town is clean. Why pay for laundry wear you don't need? Compare our finely tailored form fit shirt. Yet it costs no more than ordinary shirts that only give you 5 more unneeded laundorings." "Try Gentle's Patent Laundry. Kind treatment converts your 40-trip standard to an 80-trip deluxe." "Fink's Finest Forty-Meets every standard test-Sets the standard for value."

There's plenty of room for selling ingenuity when a standard is used in this manner. Leave it primarily up to the individual seller himself to decide whether or not to stress the wear performance factor; but give the standard wide independent circulation (through the schools, etc) among consumers, to spur demand for such information. Take new sample checks at intervals--say every five years--and raise or lower the (average) standard accordingly. Repeat the process, developing new "Comparative Standards" for other qualities, such as shrinkage, whenever a substantial potential demand is uncovered.

This proposal has yet to be submitted to the experts. It is not offered as a universal panacea; but it would meet many needs that are missed by the standards concepts now prevailing--and it would work with competitive merchandising, not against it.

There is a strong case for a single private body to serve as a focal point of leadership in standards development, for both industrial and consumer goods. Its logical functions would be: To promote actively the use of standards; to assist in

the actual development of individual standards through voluntary agreement by producers, merchants, and users; to maintain on a high plane its own rules of equity and adequacy as rigorous tests of all standards issued in its name. It would call upon both government and private sources for aid in developing tests and for market information. To the extent that advance acceptances and performance checks might be required, it could enlist government collaboration. To carry out these general functions, a single agency dealing with all types of standards problems (including simplified practices) should be feasible.

To provide effective leadership, such a standards agency would itself have to meet certain minimum requirements. It would have to be completely above suspicion of undue financial control by special interests. Its top management should reflect equitably the points of view of producers, merchants, and consumers; but it should be free of all official entanglements with other organizations, free to act as a single-purpose body. It should be led, particularly in the next few years, by an able enterprise builder devoting all or a large share of his attention to its development. Its staff should include men competent not alone in engineering, but in negotiations, in market analysis, and in promotion. Its procedures should facilitate the most direct contact with the best technical skills--including merchandising--available throughout the country. Furthermore, these procedures should combine equity with realistic speed, speed in tune with the actual pace of industrial progress.

The future development of commercial and industrial standards will probably place a heavily increased burden on the technical facilities of the NBS. Steps should be taken to strengthen the Bureau accordingly. In particular, more direct and more adequate legislative authorization should be provided for work to be done without charge by the NBS, on request from tax-exempt private organizations judged to be operating in the broad public interest. While the present survey has not been focussed on the Bureau's work related to Federal procurement, there is evidence that a thorough study of this function might point to substantial improvement. It has been suggested that the Bureau's basic scientific work suffers personally from lack of funds. If further study should support this claim, steps should be taken to apprise business and the scientific professions of the facts; for this is the primary responsibility for informing the Congress on services required from the Bureau. Finally, the Commercial Standards and Simplified Practice Divisions should be removed from the Bureau as soon as it may be feasible. Their work, being primarily involved in questions of business judgment, is out of place in this otherwise exclusively scientific and technical body.

These commercial activities of the NBS should be transferred, either to the Office of the Secretary or to the Bureau of Foreign and Domestic Commerce. But the move should be made only when a feasible administrative plan can be devised and put into operation. The work of the Commercial Standards and Simplified Practice Divisions should be continued. The demand for commercial standardizing activity in the Department is quite likely to increase in any event, even though establishment of the new private standards body would call for a change in the nature of this work. It is reasonable to proceed on the assumption that the Department's experienced and competent personnel will prove capable of adapting themselves to such evolution in the character of their work as circumstances may require.

If and when the transfer of the Commercial Standards and Simplified Practice Divisions from the NBS is made, it should not be necessary thereafter merely to stereotype the Department's commercial standards work in terms of existing routine.

On the contrary, if an approach along the general lines recommended in this report is adopted, it should be possible to proceed almost immediately with experiments looking to material improvement in the art of standardization. These might include study of the available means for detecting need for consumer goods standard sampling as a tool in formulating standards of simplified practices for consumer goods, the active use of advance acceptances as a device to speed the effective adoption of new standards, the possible use of periodic performance surveys as an aid to standards progress, and the development of more effective procedures for reaching voluntary agreements on standards in process. Also, if the recommended new type of performance standard discussed in this report should pass the test of advance criticism by experts, it would be highly desirable to select some promising items and develop the entire procedure on an experimental basis. In short, there should be plenty of valuable new work ahead for the Department's commercial standards group. However, this work should eventually be concentrated on experimental development and service. Private organizations, including the proposed new standards body, should be led to accept full responsibility for promoting new standards. They should carry on such promotion in their own name, without leaning unduly on the public good will attached to the reputation of any government agency.

To conclude, the outlook calls for more effective leadership in future standards development than has previously existed. The new emphasis is likely to be on performance information and related standards, for consumer goods. To contribute most effectively, the Department should foster active collaboration by its agencies, the NBS, and (probably) the BF&DC, with private standardizing activities. In particular there is need for rebuilding the American Standards Association, in order to provide an effective spearhead of leadership.

The NBS needs stronger legislative authorization for contributing its measurement skills to the anticipated new developments. As a corollary, its scientific work and its procurement testing for the Federal Government might well be subject to review, with real prospect of enhancing their effectiveness. The commercial activities of the NBS should be transferred elsewhere in the Department, and continued. There will be immediate opportunities for pioneering experiments by the group transferred, looking to basic improvement in the whole standardizing art, applied particularly to consumer goods. In particular, it is suggested that a radically different type of comparative performance standard for consumer goods might be developed, for systematic use as a device to sharpen the edge of competitive merchandising.

The key recommendation is the complete rebuilding of the American Standards Association into a new, exclusively private standards body, capable of dealing effectively with both industrial and consumer goods. The Secretary of Commerce can legitimately lend his good offices to this venture, by reason of the Department's long continued membership in the Association, and more important, because of his broad responsibility for promoting commerce. However, adoption of these recommendations would have far-reaching effects on future operations of the National Bureau of Standards. Hence this report should first be submitted to the Bureau's Visiting Committee for their consideration. The Secretary might suggest that this Committee join him in preparations for calling a conference of business executives and other leaders interested in the future development of standards in the United States.

**First
R E P O R T**

on

THE POLICY COMMITTEE ON STANDARDS

by

Charles E. Wilson, Chairman

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June 6, 1945

Mr. Gano Dunn,
Chairman of the Visiting Committee of the
National Bureau of Standards

DEAR MR. DUNN:

In behalf of the Policy Committee on Standards, herewith is submitted the report of that committee. The report is accompanied by **Exhibit A** and **Exhibit B**, Supporting Memorandum. **Exhibit A** is Carroll Wilson's report of December 3, 1943, revised as of September 15, 1944.* **Exhibit B** is a short treatise on the present situation of standardization activities in this country as they now exist and the problem in connection with those activities as understood by this Committee.

The report itself is confined to the problem assigned, and as such states its own case.

In arriving at the conclusions contained therein, a number of representatives from numerous branches of industry were consulted and in general, accord was reached.

These contacts and resultant discussions disclosed a number of factors which, while not of a nature to be included in the report, should be understood and considered. A review of some of these is given in this submittal letter.

From a study of the report, with its accompanying exhibits, it becomes apparent that no unified standards procedure exists and even after this situation is corrected by the standardizing bodies, a new procedure will require new techniques, broadened scopes and activities on the part of all. Cooperation between all must be accomplished.

Perhaps the greatest problem will be for ASA to accommodate its new burdens in an independent, single-purpose body, free of financial domination by any one interest, and its management reflecting adequately and equitably the interests and experience of producers, distributors and also the consuming public. This broadening of ASA interests in consumers goods will doubtless require an increase in the work of merchandisers and perhaps of educational institutions, in the top policy levels of its advisory council or board.

The ASA must arrange for more expeditiously clearing and approving standards through its Standards Council, broadened or streamlined through perhaps a board of judiciously minded authorities.

When a desire for a standard has been established, the ASA should promote the development of consumers goods standards and must foster intelligent use thereof by the public, with the collaboration of educational bodies, through active participation in ASA.

Other questions which are apparently new and unanswered today are these: What kinds of Consumer Standards are needed? Should they be the "minimum standard" or the "commercial standard" or both? In such standards is "par" the level to be reached or to be beaten?

Again, does this protection of the public require a more comprehensive formal acceptance for a standards adoption, or some form of laboratory testing standard and labeling?

These are some of the problems to be worked out, and to do so will probably require a continuing flexibility of procedure between all parts of industry affected by standards. Their solution will require experience and the thorough understanding of all. Time also will be required, and only through unified action can any plan succeed.

Respectfully submitted,



Chairman
POLICY COMMITTEE ON STANDARDS

On January 12, 1945, the Secretary of Commerce of the United States, through the Visiting Committee of the National Bureau of Standards, invited representative leaders of industry to attend a "Conference on Standardization." The Industrial representatives attending this conference are listed in a box on page 146.

The conference was initiated because of the ever-increasing importance which it was felt industrial and consumer goods standards will have in our national economy and in recognition of the necessity for orderly procedure in their expanding development and for clarification of the relative roles which should be played by Government and industry in standardization activities in the postwar era.

The Secretary requested the conference to consider a report submitted to him December 3, 1943, revised September 15, 1944, by Carroll L. Wilson, Consultant to the Secretary of Commerce, entitled, *Standards in Commerce—A Basis for Action*.

A copy of this report (Exhibit A) is attached.

The conference endorsed the report and expressed the opinion that the top management of industry should give attention to the rapid growth of standards and provide for its orderly development.

The Conference also noted with approval the steps taken by the *American Standards Association* to broaden the scope of its work so that it may deal with any standards or standardization project whether in the field of engineering, consumer goods, or in any other field deserving national recognition.

The Conference recommended, however, that in the field of consumer goods, as in any other fields, each standard approved by the *American Standards Association* must represent the work of those groups which are affected by such a standard, and that no effort must be made to impose standards on them.

The Conference further recommended that the Secretary of Commerce appoint a Policy Committee of industrial executives to advise with Mr. Henry B. Bryans, President of the *American Standards Association*, in regard to these recommendations and the steps to be taken to effectuate them.

Accordingly, Wayne C. Taylor, Under Secretary of Commerce, appointed the following committee:

CHARLES E. WILSON, President, General Electric Company, Chairman
FREDERICK M. FEIKER, Dean of Engineering, George Washington University

CLARENCE FRANCIS, Chairman of the Board, General Foods Company

EPHRAIM FREEDMAN, R. H. Macy & Co., Inc.

FRANK B. JEWETT, President, National Academy of Science

WILLIAM B. WARNER, President, McCall Corporation

ARTHUR D. WHITESIDE, President, Dun & Bradstreet, Inc.

R. E. ZIMMERMAN, Vice President, U. S. Steel Corporation.

This Policy Committee reports herewith to the Secretary of Commerce, through the Visiting Committee, as follows:

The Committee believes that standards will have an ever-increasing importance. They will play an expanding role in the fields of engineering and manufactured goods to the commercial field and to many other new fields. Thus, they will ultimately affect the production and sale of all goods. With this belief, it becomes evident that provision must be made for the orderly development of all standards.

The Committee believes that standards activities which involve negotiation, opinion, judgment, or compromise, should be developed through individual and joint efforts of technical, manufacturing, merchandising and consumer groups.

The Committee also believes that these efforts will need to be coordinated and promoted through a disinterested private agency organized to function in the broad public interest. It appears that this function can most logically be fulfilled by the *American Standards Association*.

The Committee further believes: that the scope of the *American Standards Association* should be broadened so that it can handle any standards or standardization project which deserves national recognition, whether for raw materials, intermediate goods, production goods, consumer

goods, or for safety or for engineering or for commercial transactions; that the *American Standards Association* should be modified and strengthened so that it can manage this suggested broad program effectively; that the Association must make sure it includes in its activities all groups entitled to a voice in the adoption of standards as well as those competent to advise on consumer reactions; and that the *American Standards Association* maintain itself as a truly independent association privately financed, accomplishing its standards clearance and standards promotion voluntarily, with the full participation of all interests including those of the consumer.

The Committee takes in good faith the assurances of the management of the *American Standards Association* that it will prepare itself to accept these and any other further steps that may be required in fulfilling the responsibilities of the nation's standards clearing house. Accordingly the Committee believes that the *American Standards Association* deserves sympathetic support of its aims, and the continuing, active cooperation in its work, of all interested agencies, both public and private.

The broadened policy of the *American Standards Association*; the recognition by industry that retail

customers are entitled to adequate information about the product they buy; the development both by the National Bureau of Standards and by private agencies of definite laboratory and service testing—all these will make it possible eventually to supply the desired information to consumers in standardized definitions, terms, designations, and specifications of consumers' standards. Such a result will strengthen and enhance merchandising techniques, and stimulate competition in product improvement.

Normally the standardizing functions of the Department of Commerce should center mainly in the National Bureau of Standards and any work in this field by other agencies or divisions of the Department should be complementary to and

closely coordinated with the work of the National Bureau of Standards.

The true functions of the National Bureau of Standards in connection with standardization should be those of basic research, furnishing of facts, measurements, and technical assistance in the development of adequate testing methods. The National Bureau of Standards should freely lend its assistance to all responsible citizens and groups engaged in standards development. Whenever such cooperation involves public interest groups, as the American Standards Association (or certain of its member bodies), the Bureau's assistance may well be materially enhanced through personal membership and active participation by Bureau personnel, as individuals, in the work of these groups.

The Committee recommends that the National Bureau of Standards plan for a continuation of research in the field of standards, and for future development of needed new testing methods and that this be properly financed through Federal funds. The Bureau's facilities should be extended when and as necessary so that the Bureau may most effectively aid standardization projects.

The Committee recommends that the Division of Simplified Practices and the Division of Trade Standards, now a budgetary part of the National Bureau of Standards, be transferred from the Bureau of Standards to a more suitable status elsewhere in the Department of Commerce. The work of these groups should continue, but on the levels of research and technical consultation. Their research should include: studies of the economics that might result for consumers from performance and operational standards; the determination of consumers' reactions to performance standards used in merchandising; surveys to determine the need for standards in consumer and commercial fields. Assistance should be freely given to groups seeking help in formulating standards, but the department should be free of responsibility for the results.

Under this new functional assignment, the National Bureau of Standards would be equipped to furnish physical data for standards, while the Department would be prepared to supplement such material with economic and marketing information. In both these phases of standards work the facilities of the National Bureau of Standards (or the Department) would be directed to basic research for facts needed by any responsible groups engaged in formulating standards or desiring to initiate standards. (Among such groups would be included the co-operating groups of American Standards Association.) Furthermore, Bureau and Departmental personnel would be charged with giving technical counsel, and would be encouraged to participate directly in standardizing activities of various public interest bodies. The Department would abstain from promoting new standards on its own initiative and would avoid any attempt itself to compete as a national clearing house.

These recommendations are based on two assumptions:

First—that interested private groups are best qualified to initiate

Edward N. Allen, President, National Retail Dry Goods Assn
S. Bruce Black, President, Liberty Mutual Insurance Co.
Frank Braucher, President, Periodical Publishers Assn of America
J. M. Brentlinger, representing the Vice President in charge of Research & Development, E. I. duPont de Nemours & Co., Inc.
Lyman J. Briggs, Director, National Bureau of Standards
H. W. Brightman, Executive Merchandising Director, Meier & Frank
Henry B. Bryans, President, American Standards Assn; Executive Vice President, Philadelphia Electric Co.
H. A. Bullis, President, General Mills, Inc.
A. C. Chamero, Sears-Roebuck & Co., representing R. E. Wood, Chmn of Board
Willard Chevalier, Asst to the President, McGraw-Hill Publishing Co., Inc.
Clarence L. Collens, Chairman of the Board, The Reliance Electric & Engg Co.
H. M. Crane, Technical Asst, General Motors Co.
Gano Dunn, Chairman of Visiting Committee, President, the J. G. White Engg Co.
Wallace Falvey, Executive Vice President, Massachusetts Bonding & Insurance Co.
Frederick M. Feiker, Dean, School of Engineering, Geo. Washington University
Clarence Francis, Chairman of the Board, General Foods Corp.
Ephraim Freedman, R. H. Macy & Co., representing Jack I. Straus, President
Tom M. Girdler, Chmn of Bd, Republic Steel Corp, Cons. Vultee Aircraft Corp.
C. F. Hansen, Director of Research and Planning, W. T. Grant Co.
Frank B. Jewett, President, National Academy of Sciences
Charles B. Joliffe, Chief Engr Radio Corp of America
Virgil Jordan, President, National Industrial Conference Board, Inc.
K. T. Keller, President, Chrysler Corp.
Jules Labarthe, Jr., Sr Industrial Fellow, Mellon Institute of Industrial Research, University of Pennsylvania
G. M. Leber, Editor, Chain Store Age
G. C. MacDonald, Director of Bureau of Standards, Montgomery Ward & Co.
D. N. Mauger, Executive Asst, The Babcock & Wilcox Co.
H. M. McCormack, Asst General Mgr of Sales, American Can Co.
E. V. Murphree, Vice President, Standard Oil Development Co.
Arthur E. Pew, Jr., Vice President, Sun Oil Co.
C. F. Rassweiler, Vice President, Research & Development, Johns-Manville Corp.
Stanley B. Resor, President, J. Walter Thompson Co.
A. W. Robertson, Chairman of the Board, Westinghouse Electric Corp.
Clyde L. Rogers, National Industrial Conference Board
Warner Seely, Secy The Warner & Swasey Co, representing Charles Stilwell, Pres.
N. A. Shepard, Chemical Director, American Cyanamid Co.
E. O. Shreve, Vice President (Sales), General Electric Co. representing Eric A. Johnston, President, U. S. Chamber of Commerce
Earle Smith, Chief Metallurgist, Republic Steel Corp.
George H. Taber, Jr., President, Sinclair Refining Co.
Wayne C. Taylor, Under Secretary of Commerce
John M. Van Horson, Young & Rubicam Co.
William B. Warner, President, McCall Corp.
Ralph J. Watkins, Representing A. D. Whitaside, President, Dun & Bradstreet, Inc.
John W. Watzek, Jr., Crosssett, Watzek & Gates
Oliver G. Willits, Vice Pres, Campbell Soup Co, Representing A. C. Dorrance, Pres.
Charles E. Wilson, President, General Electric Co.
Carroll L. Wilson, National Patent Planning Commission
H. F. White, Representing Robert West, President, Esmond Mills
R. E. Zimmerman, Vice President & Member of Executive Committee, U. S. Steel Corp.

and formulate voluntary standards;

Second—that the American Standards Association can and will in due time develop adequate capacity, “know-how”, and status for performing the necessary functions of nationwide clearance and promotional leadership, and

In conclusion, the Committee believes that the approach recommended—calling for a functional division of effort between the Department (including the National Bureau of Standards) and interested private groups (including the American Standards Association) and for active cooperation among all parties concerned—offers great promise as a means of guiding the progressive adaptation of standards to the needs of the nation's commerce during the decades immediately ahead.

CHARLES E. WILSON, *Chairman*

Exhibit B: SUPPORTING MEMORANDUM

It is a fact, not generally recognized, that standards constitute one of the most important subjects of mutual interest to business and government, and that standards are becoming a subject of equally important interest in the relations between industry, distributors and the public.

It was, therefore, natural that the first resolution adopted by the Conference of Fifty Industrial Executives, which met on January 12, 1945, at the University Club in New York, at the request of the Secretary of Commerce, should read:

“That, in the opinion of the Conference, the rapid growth of standards activities, their extension into new fields, and the bearing of standards upon production and sale all make it important for top management to give attention to this matter and to provide for its orderly development.”

Standards, both product standards and standard methods of test, are referred to in Government purchase invitations, in Trade Practice Rules promulgated by the Federal Trade Commission, in regulations issued by the Food and Drug Administration, in safety orders of the Bureau of Mines, in many health or safety laws or ordinances of states and municipalities, and in regulations and orders issued thereunder, and by many other governmental agencies, Federal, State and local.

In many forms of regulations, due to lack of clearly stated terms hav-

ing a meaning prevalently accepted in the trade, the enforcing agency is compelled to adopt his own version of the intent of regulations and give published broadcast of such meaning. Often such terms are capable of numerous interpretations and in some cases contradictions are serious in results and contrary to intent.

Will a piece of meat pass inspection under the health laws? Providing an answer requires the use of a standard by the Government agency responsible for inspection. Is a package of merchandise falsely labeled? Is an advertisement true or false? Is a business custom a fair or unfair trade practice? There can be no answer to such questions without the use of a standard—formal or informal, adequate or inadequate.

Including Federal, State and municipal agencies, there are literally hundreds of administrative agencies which must use standards, develop them, often from the ground up—too often without the constructive cooperation of business. Thousands of such standards have been formulated by governmental administrative agencies and written into regulations with which the affected industry and trade and its customers must comply.

Provided an industry or trade has developed standards in written, clearly understandable and usable form, nearly all agencies, private or governmental, naturally adopt and use standards developed by industry, which are already accepted by, and known to the public.

As an illustration of this fact, some seventy codes, each approved as “American Standards” are now in use through legislative acts of states as the backbone of regulations for the protection of workmen, each of them developed cooperatively, by all parties of interest and under industrial sponsorship and the guidance of the American Standards Association.

Similarly, standards for the prevention of industrial diseases, fire prevention standards developed by the National Fire Protection Association, the Boiler Code, developed by the American Society of Mechanical Engineers, and the standard methods of test developed by the American Society for Testing Materials, and many others, are “American Standards” and are used in regulatory activities of many states and municipalities, and referred to in various Federal, State and municipal regulations, including building codes.

Inasmuch as the development of standards for food and drugs is assigned by Federal Statute to the Food and Drug Administration and

the Department of Agriculture, and since the development of specifications and standards for purchases by Federal Government departments is assigned by Statute to the Federal Specifications Board, standards developed for food and drugs and specifications for Federal purchases have never been presented to American Standards Association for approval as American Standards.

Similarly, standards play a rapidly increasing role in private business transactions, being used in purchase specifications for materials or equipment to be used in industrial processes or in commercial operations, or being used by distributors, especially retailers, in the purchase of merchandise for resale to their ultimate consumer customers. To an increasing extent, not yet widespread, the consuming public is becoming aware of the meaning of standards for consumer goods—especially aware of labels or other forms of certification that a product meets some standard.

Postwar Outlook

World War II, like World War I, has given a great impetus to standardization. During and immediately after World War I, all major industrial nations, except Great Britain which already had one, found it necessary to establish national standardizing bodies. There are unmistakable signs that similar acceleration and intensification is now occurring and that it is likely to continue at an even greater pace during the period of reconversion and readjustment and thereafter.

The many changes that have been caused by conversion of industry to war production that will be caused by reconversion to peacetime production have created a need for many new standards and for changes in existing standards in order to fit them to new conditions, if they are adequately to meet and help solve difficulties in production or in commercial transactions—if parts are to fit, if defects in workmanship or materials are to be avoided, if delivery dates are to be met, if misunderstandings between manufacturer and purchaser are to be eliminated and if purchasers are to be adequately assisted in selecting and obtaining without delay the proper product for particular needs.

The fields in which standardization is most highly developed are those relating to production equipment, materials or processes, to-

gether with those relating to protection against fire, accident and other hazards, both involving engineering standards.

The resultant advantages are well known; the economics of mass production and distribution, better control of product quality, broadening of sources of supply and expansion of markets, lessening of customer complaints.

But the standardization movement is spreading to other product fields—notably into the field of consumer goods—both “soft” goods, like textiles, and “hard” goods, such as household equipment.

The right of the retailer and the right of his customer to adequate information regarding the products they buy should be and is now widely recognized by industrial executives. Retail customers continue to press for information regarding the performance characteristics and serviceability of merchandise. Laboratory and service testing is becoming more general, together with more objective methods of test. This trend leads to use of standard definitions, standard terms for describing products, and other standards for consumer goods. Thus used, these constitute a somewhat new and increasingly important merchandising process or technique, and stimulate competition in improvement of products, their performance or serviceability.

In view of these significant trends, it is important that there shall be adequate organization and other provisions for the development of all types of standards which deserve national recognition. Beside the national technical and professional societies and the trade associations which are active in the field of originating or initiating the development of standards, there are two organizations, each of which occupy positions of unique importance, namely, the National Bureau of Standards and the American Standards Association.

At present, in most respects, each performs functions quite different from those performed by the other. To a limited extent, they perform similar functions, thus competing with each other or duplicating each other's work.

It is quite desirable that duplication of function should be removed and that the work of each should be strengthened, with much gain from the points of view of both Government and business.

National Bureau of Standards

The National Bureau of Standards has been, is, and was intended to be a great scientific institution—a great research laboratory in the field of measurement. It is the official custodian of the standards of measurement of the United States of America. It is this nation's prime agency in the field of the science of measurement, in the field of research and method of test, research in the field of physical and chemical constants, all of which are so essential to the development of technical industries.

In these respects, the National Bureau of Standards is truly unique and truly a great scientific research institution.

The Division of Trade Standards of the NBS assists industrial and other interested groups in the development of commercial standards. Likewise the Division of Simplified Practice of the Bureau assists industry in the elimination of unnecessary types, sizes, and varieties of manufactured products.

While a number of standards from each Division have become American Standards through the nation's clearing house, it is apparent that there is here a duplication of work.

American Standards Association

The ASA was organized to serve as the national clearing house for standards. At the present time it is a federation of twenty-one professional and technical organizations, fifty-five trade associations, seven departments and three other agencies of the Federal Government. It works on the principle that each “American Standard” must represent a consensus of the groups concerned with it. Depending on the standard under consideration, these include producer, consumer and general interest. Over eight hundred standards have been approved, of which approximately 30% originated with the American Society for Testing Materials. Over five hundred national organizations have been cooperating in its activities and over three thousand men and women are serving on its committees. Over fifty Federal Bureaus are cooperating in the work of the ASA. Most of its work is carried out through balanced all-party-at-interest committees, each of which, somewhat similar to a legislature, is made up of representatives appointed by the organizations interested in the particular subject under consideration.

The public interest requires more effective standardization facilities than have so far been provided by either or both semi-private agencies and Government.

Strengthening the Bureau of Standards

One of the chief bottlenecks in the development of national standards is the lack of adequate test methods for determining the characteristics of products. This is especially true in the case of consumer

cal research; testing or laboratory work as such. The member and co-operating bodies should be those through whom all such work must be initiated and performed.

Although the initiation of standards is not a function of ASA, any interested group may propose that a standard should be developed and can sponsor a proposed standard or seek a sponsor. If, after investigation, the ASA finds that there is sufficient support for the development of the standard, a properly balanced, all-party-at-interest committee can be appointed and the project carried to conclusion. In some cases a conference, supplemented by correspondence, may suffice. Provision is also made for submission to ASA of existing standards for approval as "American Standards."

If, however, there is lack of adequate support for the project or the industry or trade concerned actively opposes the development of a standard for which consumers or distributors recognize a need, a preliminary or temporary standard may be prepared, with the benefit of basic research data obtainable from any source, including that of any Department of Commerce Divisions or its agencies established to furnish such data.

With a national clearing of standards activities functionally, the American Standards Association can readily and definitely improve these added consumer goods activities.

Realizing the broadened scope that would thus lie before the Association, and realizing that the Association has not in the past lived up to these broadened activities, the Committee is glad to be informed by Mr. Henry B. Bryans, President of the ASA, that through its Board and its Standards Council, active work has been and is being done to meet the needs of the postwar period and particularly to permit it to function most effectively in all standards fields including that of consumer goods.

Mr. Bryans advises further that:

Activity of ASA in the field of Consumer Goods is under the supervision of the Advisory Committee on Ultimate Consumer Goods and sometimes jointly with some other Committee. An amendment to the Constitution of ASA designed to remove any doubt as to whether ASA may serve in the field of consumer goods has been confirmed by ASA Member-Bodies and approved on May 24, 1945;

The ASA is making an intensive

study of means of improving its organization and methods in order best to serve the mutual interests of business and the consuming public in the field of standards for consumer goods;

Interlocked with these problems is that of securing a broadening of the membership by enlisting both more associations as Member-Bodies and companies. To all these the Board of Directors of ASA is giving careful study.

While carrying on these studies, the Association is endeavoring to maintain and to improve upon the methods and traditions developed during its twenty-six years of experience;

In particular, it maintains the principle that all groups substantially concerned with a standard have an inherent right to a part in its development; and that no standards will be approved; without a clearly demonstrated consensus of the interested groups.

It likewise conducts its affairs so that there will be universal confidence in its integrity and so that every group, irrespective of size or influence, can have confidence that it will have opportunity for "its day in court";

It has attained and maintained itself in a position to deal adequately with the international aspects of any standards undertaking;

It also maintains a comprehensive and up-to-date library and information service; and publishes a monthly magazine covering broadly and thoroughly the field of standards.

Conclusion

A digest of this supporting memorandum clearly demonstrates to this Committee that it is to the forward-looking self-interest of business that its executives should make adequate provision for the handling of standardization problems, first, within their own companies, and second, within their trade associations, and thirdly, within the professional and technical societies. It is equally to their interest that they should, through their companies, and trade associations, adequately support, both with effort and funds, not only the standardization work of the national, professional, technical and trade associations in which they have or should have a part, but also, through affiliation, activity and the supply of adequate finances, support the work of the federation of these bodies—the American Standards Association.

goods. The development of methods of test requires a great deal of physical and chemical research.

The NBS has been a chief source of basic research on methods of test and other types of scientific data needed in standardization activities. While its work has been invaluable and deeply appreciated, the Bureau's work in this field needs to be broadened and strengthened, and its resources for this type of work need to be increased.

The Field for American Standards Association

For that class of standardization activity which requires knowledge of customer requirements, manufacturing process, trade terms, and, therefore involves judgment and opinion and which involves progressive change, the best job can and should be done by semi-private agencies.

The ASA should continue as the clearing house for national standards, limiting its activities exclusively to clearing house and promotional functions. The Association should not be the initiating source for standards formation; for physi-

A New Opportunity For Free Enterprise

APPENDIX 5

Exchange of letters between Wallace, Wilson, and Bryans places greater responsibility on industry and ASA for standards development

THE study by the U. S. Department of Commerce of the relative roles of industry and government in standardization came to a climax this month in a three-way correspondence between Henry A. Wallace, Secretary of Commerce; Charles E. Wilson, chairman of the Policy Committee on Standards; and Henry B. Bryans, president of the American Standards Association. In his letter accepting the report of the Policy Committee on Standards, Secretary Wallace reverses the wartime trend and proposes to return to private enterprise the important function of determining industrial and consumer standards.

Mr Wallace's letter to Charles E. Wilson, president of the General Electric Company and chairman of the Policy Committee on Standards appointed by the Secretary of Commerce in January 1945¹, characterizes the negotiation and publication

of standards through private initiative and on a wholly voluntary basis as "eminently desirable". In the letter (published in full below), he reviews his plan to reorganize the National Bureau of Standards, and states that to the extent that the work of the American Standards Association is strengthened in accordance with the recommendations of the Policy Committee "so that it can perform trade standard services to the satisfaction of all the groups with an interest in standards, the Department is prepared to encourage the use of the facilities of the American Standards Association for the initiation, development and publication of standards". He expresses the hope that American industry will support and take advantage of the facilities of

¹ The first report of this committee and a description of the events that led to its appointment are published in *INDUSTRIAL STANDARDIZATION*, July 1945, pp 144-149.

the American Standards Association.

In the three-way correspondence between the Department, the Policy Committee, and the ASA, the Policy Committee has given assurance that industry will make possible the necessary extensions of the facilities of the ASA to enable it to render all desired services (see report of Policy Committee, p 69); and the ASA has informed Secretary Wallace and the Policy Committee of its acceptance of the responsibility (letter reproduced in full on p 68).

Plans are already under way to expand the ASA financial structure as well as to broaden the incidence of support and participation in the ASA. (On page 71, Howard Cooley, chairman of the ASA Executive Committee, describes some of the implications of the new policy and the steps being taken to expand the ASA in order to put the new policies into effect.)

U. S. DEPARTMENT OF COMMERCE
OFFICE OF THE SECRETARY
WASHINGTON 25, D. C.
February 28, 1946

*Mr Charles E. Wilson, Chairman
Policy Committee on Standards
New York, New York*

DEAR MR WILSON:

This is with reference to the report of your Policy Committee on Standards which was made last June, and the supplementary report submitted on December 22, 1945, after further hearings on the original report. I am very sorry not to have been able to write you sooner on this matter, but I wished to have a careful study made of these reports in relation to the proposed reorganization of the Department.

I believe that the Department can accept whole-heartedly the general objectives and spirit of your Committee Report, which is to encourage the wider use of standards in industry and to bring about the greatest possible cooperation among the various organizations active in this field. The Department will be delighted to see the American Standards Association and other organizations pursue a vigorous program in the field of trade standards and will cooperate to the fullest extent in providing both scientific and technical, and economic and marketing data which will be useful in such a program.

One of the two principal recommendations of your Committee fits in very well with the plans for the reorganization of the Department. I refer to the recommendation that the divisions of Simplified Trade Practices and Commercial Standards be transferred out of the Bureau of Standards to a "more suitable status elsewhere in the Department", and that "the Bureau of Standards' functions should be those of basic research, furnishing of facts, measurements and technical assistance in the development of adequate testing methods". The logical place for these two divisions is the new Office of Domestic Commerce, which will be responsible for the Department's general services and programs for the promotion of domestic industry, business, and trade. In accordance with your recommendations, I am planning to have these divisions transferred from the National Bureau of Standards to the Office of Domestic Commerce as soon as it is legally possible and suitable internal arrangements can be made.

The other principal recommendation of your Committee is that the Department of Commerce withdraw from the field of initiating and publishing standards which are voluntarily agreed to by industry groups as soon as the American Standards Association "implements itself for such functions". Your Committee has supported this recommendation with the following considerations: (1) that "interested private groups are best qualified to initiate and formulate voluntary standards"; (2) there is now some duplication of effort as between the American Standards Association and the Department; and (3) the voluntary standards published by the National Bureau of Standards have sometimes been misinterpreted as scientifically determined government standards, or as compulsory standards.

Certainly the Department does not wish to compete with, or to duplicate, the services which private organizations can provide equally well, nor does the Department wish to have voluntary industry standards misinterpreted as scientific or compulsory government standards. We have tried to guard against such misinterpretations by printing on the face of the booklets published by the National Bureau of Standards, "A RECORDED VOLUNTARY STANDARD OF THE TRADE", and in other ways.

I do not believe, however, that the Department of Commerce can properly close the door to industry and other economic groups which request the direct assistance of the Department in developing and in publishing voluntary standards on their behalf. The Department has a statutory responsibility to provide such services in the interest of business and industry and the general public and we have no authority to refuse such requests. In addition, there may be circumstances in which the cooperation of the Department of Commerce and the Department of Justice will be desirable in order to avoid any possible misinterpretation of voluntary industry agreements on standards in relation to the anti-trust laws. However, to the extent that the American Standards Association reorganizes its procedures in accordance with the recommendation of your Committee so that it can perform trade standard services to the satisfaction of all the groups with an interest in standards, the Department is prepared to encourage the use of the facilities of the American Standards Association for the initiation, development, and publication of standards.

In view of the tremendous list of commodities, practices, and services and the limited facilities of the Department in the commercial standardization field, it would seem eminently desirable that the American Standards Association and other voluntary business groups as well, expand and improve their facilities for negotiating and publishing trade standards. In fact, I regard it as one of the important functions of the Department of Commerce to encourage and stimulate such a development. The Department itself does not plan, nor can it hope to monopolize this field of activity. On the contrary, it is the job of the Department as I see it to stimulate and assist activity by private groups in this field and to perform a pilot function in commercial standardization work as it has been doing for some two decades.

In view of the above considerations, I envisage that after their transfer from the National Bureau of Standards the divisions of Simplified Trade Practices and Commercial Standards will perform the following functions with respect to voluntary trade standards and simplified trade practices:

1. As recommended by your Committee, sponsor and perform basic research in the economic and marketing fields for the American Standards Association and other groups and organizations engaged in formulating voluntary standards or desiring to initiate standards;
2. As recommended by your Committee, act as sponsor for groups in proposing standards to the ASA for issuance as American Standards;
3. Retain the Department's present function of initiating and proposing to the ASA or to any other group or groups the development of voluntary standards where the Department finds on the basis of economic studies that such standards would be desirable in the public interest; and
4. Retain the function of publishing a voluntary standard developed by a group if that group requests the Department to publish. Such standards will be published by the Department of Commerce (not the National Bureau of Standards) and will clearly indicate the industry or other group or groups on whose behalf the Department is publishing. However, where testing methods or the research of the National Bureau of Standards have contributed to the establishment of particular standards, appropriate credit will be given to the Bureau in publication.

This in general will mean the continuance of the functions of the Department on commercial standards and simplified trade practices in accordance with well established procedures. However, the Department would be prepared as a matter of policy to suggest, when the Association's facilities are adequate, that standards be submitted to the ASA for publication as American Standards. The business group would, however, be perfectly free to make its own decisions as to whether to publish the standard under its own name; through the American Standards Association; or through the Department of Commerce.

The Department is interested in cooperating actively with your Committee and with the ASA and other interested groups to promote the wider use of voluntary standards and their adoption to the needs of the nation's commerce in the postwar years. I should like to suggest that a joint conference committee of the ASA and the Department be set up for this purpose. I believe that this conference committee should cover the entire field of standards—the scientific, technical, and testing aspects as well as the economic, marketing, and trade aspects of the problem—and that the Department's representatives on the committee should therefore include scientists of the National Bureau of Standards as well as officials of the Office of Domestic Commerce, Office of the Solicitor, and the Office of Program Planning.

I should also like to ask that your Policy Committee on Standards continue to function as an advisory group to me and to the Department of Commerce so that I may consult it from time to time on questions of broad policy in the field of standards. I feel that the experience of your Committee during the last year will be of great value in dealing with additional problems which will arise in this growing field of standards, and that the continuance of the Committee will insure maximum use and benefit of that experience.

I wish to express to you and to your Committee my sincere appreciation of the service which you have performed for the Department and for American business in your consideration of this important subject. Your studies have helped to clarify the entire situation and to point out some of the things that need to be done to promote the more extensive use of standards in the postwar period. I sincerely hope that I may count on your continuing cooperation.

There is attached an abstract of this letter outlining the Department's future policy on standards which has been prepared to meet Mr Knoderer's request for a short and succinct statement for general distribution.

Sincerely yours,

H A Wallace

HENRY A. WALLACE,
Secretary of Commerce

ASA Accepts Challenge For Expanding Program

(APPENDIX 6)

AMERICAN STANDARDS ASSOCIATION
NEW YORK 17, N. Y.
March 8, 1946

The Honorable Henry A. Wallace
Secretary of Commerce
Washington, D. C.

MY DEAR MR SECRETARY:

The American Standards Association and its affiliated organizations greatly appreciate the confidence in them which you expressed in your letter of February 28, 1946, to Mr Charles Wilson as Chairman of the Policy Committee on Standards.

Through a change in its constitution, the American Standards Association has been enabled to broaden the scope of its work so that it may deal with standards or standardization projects deserving national recognition, whether in the field of engineering, consumer goods, safety codes, or in other fields. Arrangements are under way for the addition to our Board of Directors of leaders in the consumer goods field, retail trade and the other interested groups, thus rounding out the representative character of our Board.

The leadership of the Association has been strengthened through the organization of an Executive Committee under the chairmanship of Mr Howard Coonley. Mr Coonley has retired from the chairmanship of the Board of the Walworth Company and is now devoting himself to the job of conditioning the Association to its increased responsibilities.

We sincerely believe that the ASA, with its 28 years of background in servicing the American people, is in a unique position to live up to the requirements placed in its hands by your letter to Mr Wilson and by the report of Mr Wilson's Committee. We, therefore, accept the responsibility entailed.

Your belief in the ability of private enterprise to demonstrate its effectiveness through voluntary action lends greatest significance to the responsibility which the American Standards Association and its affiliated bodies are accepting. We have a record of successful operation in the field of industrial self-regulation. We feel that the arrangements suggested by the Depart-

ment of Commerce have opened the way for a new concept in the relationship between Government and industry. It is our privilege to validate the responsibility which industry and private groups must carry in the development of means for better standards of living for the American people through the medium of the American Standards Association and its affiliates.

It is particularly gratifying to have you propose the formation of a joint committee of the Department of Commerce and the American Standards Association to cover the entire field of standards and I believe that in this way we shall be able to avoid duplication through close cooperation and alignment of our operations. The wealth of experience represented by the Policy Committee on Standards that you have invited to remain in operation in an advisory capacity will contribute greatly to the joint development of standards by all concerned.

We have been greatly interested in the administrative changes which you are making in order to improve your services to groups concerned with standards. The transfer of the Divisions of Simplified Practice and Commercial Standards to the new office of Domestic Commerce should, as you indicate, minimize the misinterpretation of the standards as scientifically determined Government standards. We note that the two divisions will sponsor groups in proposing standards and standardization projects to the American Standards Association. We appreciate this function which, we believe, will be useful to all concerned.

We also note that the Department will publish a voluntary standard developed by a group if that group requests publication by the Department, but that the publication will clearly indicate the group on whose behalf the Department is publishing it. We are glad to

note this last provision since it should tend to minimize misunderstanding as to the status of the standard and its relation to the Government.

The sponsoring and carrying out by the Department of basic research in the economics of standards and their use in the marketing field should perform a much needed function which will be of great value to industry and to the consuming public.

The steadily increasing demand for standards on the part of industry and the great increase in the use of standards and interest in them brought about by the war have made necessary important changes in our organization and work of the American Standards Association.

Considerable progress has been made in simplifying and decentralizing the technical work and further streamlining of processes in order to speed up the development and approval of standards.

More systematic programming in the fields in which the ASA is working is being brought about through closer coordination and changes in committee setup.

Plans are already under way to expand the ASA financial structure. It is now contemplated to carry out an active and continuous program to provide for an increased budget which will broaden the incidence of

support and participation in the ASA. Thirteen national organizations have affiliated in the last year. There are now 94 national organizations in the membership. The principal consumer and labor groups are represented on the main ASA committee on consumer standards.

In conclusion, I cannot refrain from saying a few words in regard to the remarkably effective cooperation which we have had from the National Bureau of Standards for a quarter of a century or more. The Bureau is represented on considerably more than 100 ASA committees. In particular, the research work of the Bureau has been of invaluable assistance to a great number of agencies engaged in standards work. There is serious need for a large amount of this type of technical data, and we hope that under the new arrangements, the Bureau can be provided with sufficient resources to meet this need.

With many thanks for your constructive consideration of this subject of standardization, and with best wishes,

Sincerely,

HENRY B. BRYANS,

President

The Final Report of the Policy Committee on Standards

To the Secretary of Commerce

PURSUANT to the suggestion conveyed to this Committee by your Assistant, Mr Malcolm Kerlin, that the Policy Committee on Standards should have further hearings of interested groups concerned, invitations were issued to consumer groups, labor groups, and educational groups to meet with the Committee at a public hearing.

Attached Appendix "A" [not included in this publication] is a copy of the Committee's call of meeting of September 10, 1945. A copy of this call was sent personally to each of the following:

Henry B. Bryans, President, American Standards Association.
Carroll L. Wilson, National Planning Commission.
Malcolm Kerlin, Assistant to the Secretary of Commerce.
Lyman J. Briggs, Director, National Bureau of Standards.
J. W. Studebaker, Commissioner, U.S. Office of Education.
George F. Zook, President, American Council on Education.

Harry E. Rogers, President, Brooklyn Polytechnic Institute.

Donald E. Montgomery, Member of the ASA Advisory Committee on Ultimate Consumer Goods for the CIO.

Colston Warne, Amherst College (Honorary Vice President, National Consumers League).

Helen Hall, Director, Henry Street Settlement, New York; National Federation of Settlements.

Ruth O'Brien, Bureau of Human Nutrition and Home Economics, U.S. Department of Agriculture.

Murray Lincoln, Executive Secretary, Ohio Farm Bureau Federation.

Faith Williams, Member of the ASA Advisory Committee on Ultimate Consumer Goods for the American Association of University Women.

Caroline F. Ware, Chief, Social Division, American Association of University Women.

Florence Thorn, Head, Research Department, American Federation of Labor.

Margaret Scattergood, American Federation of Labor, Research Staff.

M. H. Hedges, Director of Research, International Brotherhood of Electrical Workers.

Selia Massey, Executive Secretary, American Home Economics Association.

Harriett Howe, American Home Economics Association, Consumer Education Service.

Carol Moffett, American Home Economics Association.

Those attending this meeting were in each case representing a specialized organization or association, as is evidenced by the following list of those present:

American Home Economics Association, Carol Moffett.

American Association of University Women, Carol F. Ware.

Bureau of Human Nutrition and Home Economics, U.S. Department of Agriculture, Ruth O'Brien.

Advisory Committee on Ultimate Consumer Goods to the American Standards Association, Representative of the American Association of University Women, Faith Williams.

American Federation of Labor, Research Staff, Margaret Scattergood.

International Brotherhood of Electrical Workers Research, William D. Walker.

In full attendance of the Committee, a detailed discussion of those

present brought forth the desires and reactions of each group or individual present. Before the close of this meeting each group was requested to present its point of view with definite recommendations as to how its desires might be accomplished. Such reports have been received and analyzed with the Committee's report of June 1, 1945.

Your Committee does not believe the report needs to be changed, as all suggestions or requests for change, after close comparative study, demonstrate that the implementation of the report by the American Standards Association and by the Department of Commerce and Bureau of Standards will in every case produce the results desired by each one and every interested body.

The June 1, 1945, report enunciates two specific recommendations:

First. That standards activities which involve negotiation, opinion, judgment, or compromise should be developed through individual and joint efforts of technical, manufacturing, merchandising, and consumer groups. It was contemplated that this was to be fulfilled by the American Standards Association only when and as it implements itself for such functions and as it demonstrates its ability to perform efficiently, expeditiously, and satisfactorily, as it has demonstrated heretofore on industrial standardization.

Second. That the National Bureau of Standards' functions should be according to those of basic research, furnishing of facts, measurements, and technical assistance in development of adequate testing methods.

A review of objections and suggestions of the represented groups follows. When reviewed in relation to the report of June 1, and with the organic act and statutes under which the National Bureau of Standards operates, the comments* given here disclose the evident means now available to meet such objections or suggestions. It was the consensus of those attending the hearing:

(a) That American Standards Association should implement itself to be the clearing house for all standards activities which involve negotiation, opinion, judgment, or compromise.

* COMMENT: Such a recommendation was included in the June 1st report.

(b) That there is a need on the part of various groups—such as consumers and retailers of manufactured goods—for basic research and furnishing of facts, measurements, and technical assistance in development of adequate testing methods.

* COMMENT: This falls within the Organic Statute creating the National Bureau of Standards.

(c) That there is a need for research and technical consultation—which can include studies of the economics that might result for consumers from performance and operational standards; the determination of consumers' reactions to performance standards used in merchandising surveys to determine the need in consumer and commercial fields.

* COMMENT: This might fall within various agencies of the Department of Commerce.

(d) That there is a need for the bringing together of such interested groups into a cohesive whole.

* COMMENT: It is suggested this might be done in the National Bureau of Standards by the setting up of an Interdepartmental Advisory Board drawn from other agencies of the Government and also a Consumers Advisory Board.

(e) That there is a need for the development of standard specifications upon request.

* COMMENT: It was suggested that this could be accomplished through the National Bureau of Standards and other technical agencies of the Department through development of standard specifications when requested to do so by important national groups, such as a Consumers Advisory Board of the National Bureau of Standards, by a retailers association, or by an association of manufacturers of a particular type of goods.

(f) That there is a need for the early publication of information relating to the specifications as and when sufficiently advanced to be of value.

* COMMENT: It is suggested that when published it be in the name of the group that requested the work, along with credit to the agency developing the specification.

(g) That the National Bureau of Standards should undertake these functions, including the publication and enforcement by and under the name of the National Bureau of Standards.

* COMMENT: It is pointed out that trade standards and simplified

practice recommendations are actually voluntary standards of the trade, but because they have heretofore been published by the Government, they have been generally regarded as Government standards. To eliminate this confusion, trade standards and simplified practice recommendations should be first published by the group sponsoring the standard or recommendation.

The use of any such standard is voluntary. A certificate and labeling procedure should be developed by the ASA for the guidance of any one when he elects to use a standard. Enforcement enters the picture only if misrepresentation occurs and the matter then comes under the jurisdiction of the Federal Trade Commission.

The Committee has carefully reviewed these suggestions and in doing so recognizes that:

(a) and (b) are in line with the Committee's recommendation.

(c) (d) and (e) are matters relating to internal organization setup and work within the Bureau of Standards.

A study of the original report of June 1, 1945, discloses that in no way is it at cross purposes with any of the stated needs except that publication of such a developed specification or standard should not be done by the National Bureau of Standards until it has been duly submitted and sponsored and approved by the American Standards Association. However, the Committee sees no objection to the publication of such standards by other than governmental groups, prior to approval by American Standards Association as an American Standard. Either the group or the Bureau of Standards should be the sponsoring body of such a standard to the American Standards Association through which it is to be adopted as an American Standard. Any non-governmental group creating such a standard, and not desiring that it be an American Standard, may publish it under its own name as a standard of that group.

Through this procedure the National Bureau of Standards will supply to all legitimate groups the full facilities offered through the Organic Act or National Statutes creating and continuing the Bureau. Also through such procedure all bureaus of the Government can consistently

supply factual data as may be available and of interest. Through the above steps all desires of these parties in interest can be met.

The initial publication of commercial standards and simplified practice recommendations by the Department of Commerce has led to their acceptance as standards developed and approved by the Government, whereas actually they represent voluntary recorded standards of the trade.

The Policy Committee on Standards therefore recommends:

(1) That hereafter consumer standards, commercial standards, and simplified practice recommendations may be first published by the consumer group or the industrial group requesting and sponsoring the standard or recommendation, with appropriate acknowledgment of the technical assistance of the National Bureau of Standards in its preparation.

(2) That such standards prepared

for such groups by the Department of Commerce should be submitted either by the group interested or by the Department of Commerce as sponsor to the American Standards Association for approval.

(3) That after approval by the American Standards Association such standards should then be issued as an American Standard. The request for approval to the American Standards Association may be made under the sponsorship of the Department of Commerce, or any other sponsor.

The Committee recognizes that this procedure can be accomplished only as fast as the American Standards Association implements itself for such functions. Progress is being made in this direction and sanguine hopes point to such accomplishment early in 1946.

The task lying ahead appears an entirely feasible one. Liaison work of this committee establishing cohesion of interest between the De-

partment of Commerce the American Standards Association and interested standardizing bodies will, we confidently believe, demonstrate the soundness of the recommendations contained in the Committee's report of June 1, 1945.

In conclusion we wish to quote from the last paragraph of the June report; namely, "that the approach recommended—calling for a functional division of effort between the Department (including the National Bureau of Standards) and interested private groups (including the American Standards Association) and for active cooperation among all parties concerned—offers great promise as a means of guiding the progressive adaptation of standards to the needs of the nation's commerce during the decades immediately ahead."

C. E. WILSON

Chairman,

Policy Committee on Standards

June 10, 1948

Admiral G. F. Hussey, Jr.
Secretary, American Standards Association
70 East 45th Street
New York 17, New York

Dear Admiral Hussey:

In your letter of May 20, 1948, you advise that steps are being taken to incorporate the American Standards Association under the laws of the State of New York, and that under those laws the members of the existing association will automatically become members of the incorporated association.

As you are aware from the discussion of the matter which took place in the Office of the Solicitor of this Department on May 10, 1948, legal questions have arisen with respect to the propriety of the membership of Government Agencies in the Association without express statutory authorization, either in the present unincorporated association or in the New York corporation.

Under these circumstances, I regret that the Department of Commerce will be unable to become a member body of the American Standards Association when incorporated under the laws of the State of New York, and cannot therefore be in the position of a member-body at the time of the incorporation under New York laws.

I wish to assure you, however, that the Department of Commerce is ready and willing to continue our present full participation and the most effective possible cooperation in the technical activities of the Association.

Sincerely yours,

(signed) Charles Sawyer

Secretary of Commerce

July 2, 1952

Admiral G. P. Hussey, Jr.
Managing Director
American Standards Association
70 East Forty-fifth Street
New York 17, New York

Dear Admiral Hussey:

I am glad to accept the invitation extended in your letter of May 23, for the members of the staff of this Department to attend meetings of your Standards Council. In order that there be no misunderstanding of our participation in the affairs of your organization, I am considering your invitation as a very general one and I am not designating any specific official of the Department to attend regularly meetings of the Standards Council.

As you know, the Commodity Standards Division is assigned to the Office of Industry and Commerce, of which Mr. M. B. McCoy is Director. The Bureau of Standards, of which Dr. A. V. Astin is Director, cooperates with your Association on technical matters. In view of the general interest of both of these organizations, I suggest that you send notices of meetings and the agenda of the Standards Council to both Messrs. Astin and McCoy. These two officials will make arrangements or designate an appropriate representative to attend any particular meeting.

Sincerely yours,

/s/ Charles Sawyer

Secretary of Commerce

July 7, 1952

The Honorable Charles Sawyer
Secretary of Commerce
Washington 25, D. C.

My dear Mr. Secretary:

It is a pleasure to have your letter of July 2, accepting the invitation for members of the staff of the Department of Commerce to attend meetings of the Standards Council with the privilege of the floor.

The basis on which you accept the invitation is entirely agreeable to the American Standards Association.

It is particularly gratifying that you designated Mr. McCoy and Dr. Astin as contact men for the Department, because with both we have had most pleasant and fruitful relations.

Looking forward to welcoming Dr. Astin or Mr. McCoy or their designees at meetings of the Standards Council, I am

Sincerely yours,

G. F. Hussey, Jr.
Managing Director

