



NORTH AMERICAN ENERGY STANDARDS BOARD

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October 2, 2009

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The Honorable Marlene H. Dortch
Commission's Secretary
Office of the Secretary
Federal Communications Commission
236 Massachusetts Avenue, N.E., Suite 110
Washington, D.C. 20002

RE: Comments – NBP Public Notice #2, GN Docket Nos. 09-47, 09-51 and 09-137

Dear Ms. Dortch:

The North American Energy Standards Board ("NAESB") appreciates the opportunity to offer these comments to NBP Public Notice #2, GN Docket Nos. 09-47, 09-51 and 09-137 to the Federal Communications Commission ("FCC" or "Commission").

While our comments are more general than the questions posed in request regarding the suitability of communications technologies, availability of communications networks, spectrum, real-time data, and home area networks; they are directed to decisions the FCC may make on the applicability of industry standards. Application of industry standards can support the advanced infrastructure and services as a foundation for the efficient implementation of Smart Grid technology. We would offer that the standards considered should be developed in a process that embodies the following characteristics:

- **Transparency.** Transparency in decision making is a key factor in garnering support. Transparency includes both the identification of the decision makers and how decisions were made. Transparency applies to standards development, standards selection and it also applies to the development of the plans and strategies. While providing adequate transparency can take time, it has been our experience that it expedites industry acceptance, support, and market implementation.
- **Inclusion.** Stakeholders should be given the opportunity to take part in the decision making and standards development. Reaching out to trade associations and industry organizations to encourage their stakeholders to participate has proven essential in assuring that diverse groups are made aware of the planned standards development activities. Trade associations, industry organizations, regional groups and the industry itself play key role in soliciting a broad and regionally diverse group of participants. Regulatory staff, both state and federal should be encouraged to participate to ensure that directions taken support their policies.
- **Balance.** Decision making, particularly for standards that have broad applicability, should not only include the stakeholders who will be responsible for modifying their business processes to implement the standards, but also the service providers. The market interests should be balanced and there are a number of ways in which this balance can be achieved. Balance of geographic areas can be important when the decisions made or the standards developed are not specific to a given region, but rather are intended to apply more broadly. Equally important, those entities either politically accountable for the success or operationally accountable for the success of the standards and related decisions must have a strong voice in the overall planning and strategic



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sessions, and also in the identification of standards needed, the development of the standards and the ultimate adoption of the standards.

- Documented and Accessible Process. Participants should have access to the process by which the standards are developed and also the process by which related decisions are reached. Importantly, an appeal process should be defined not only as it pertains to endorsement of standards, but also to the standards development process itself.

The above four characteristics for standards setting made are particularly important when the standards may be the subject of regulatory action either at the state or federal level. Ensuring the broadest level of inclusion, balance of interests, transparency in all aspects and easily accessible documentation on the process strengthens the work products and supports building industry consensus – crucial when the work products are intended to be forwarded to regulators for their consideration.

We look forward to continuing to participate in your process as the needed Smart Grid suite of standards and specifications are adopted and put to use in the energy market, and we are grateful for the opportunity to contribute in the priority action plan efforts outlined by the National Institute of Standards and Technology.

With Best Regards,

Rae McQuade

Rae McQuade, President, NAESB

cc: Ralph Cleveland, Chairman of the NAESB Board of Directors
Cade Burks, Retail Electric Quadrant Vice Chairman of the NAESB Board of Directors
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