



313-B North Highway 11  
West Union, SC 29696  
(864) 638-8300

**To:** John Caskey, Industry Manager, NEMA  
Tom Nelson, Chair ANSI C12 Main Committee  
Larry Kotewa, Chair ANSI C12.17 Committee

**cc:** SC17 WG2

**From:** Itron, Inc.  
Richard A. Coblens  
Product Line Manager  
NEMA Executive Representative

**Date:** January 5, 2006

**Re:** ANSI "Registry" Issues

**I. Itron objects to ANSI C12 Standards that are non-self-compliant.**

**ANSI C12.19 "version two", upon publication, will become the only ANSI C12 standard that does not allow Itron or any other manufacturer to self-certify its products.**

Presumption: FutureDOS R&D is allowed to reserve assignment of "relative universal identifier" (or "DEVICE CLASS" codes) based on their own unilaterally developed "compliance" program.

The stated requirement of "compliance" testing for the codes to be assigned and employed prohibits adopters from self-compliance. Compliance to **EVERY** other ANSI C12 standard is possible without the payment of a compliance testing fee to a third party.

The claim for payment of a "compliance" testing fee to FutureDOS R&D has also been made for the codes ("security mechanism universal identifier algorithm" and "provider root application title universal identifier") required for the use of ANSI C12.22, expected to be published in 2006. **If this remains, ANSI C12.22 will also be non-self-compliant upon publication.**

**II. Itron objects to a profit-based ANSI C12 registry.**

Where needed the ANSI C12 registry should be not-for-profit and run in a manner that provides non-discriminatory access. Both ANSI standards C12.19 and C12.22 contain language instructing users to contact NEMA for the "registry". NEMA has made provisions to meet that language without seeking an outside, for-profit partner.

This registry should be explicitly and financially supported by all stakeholders in the industry, via these stakeholder entities at a minimum:

- "ANSI General Interest" via the AMRA
- "ANSI Users" via the Edison Electric Institute
- "ANSI Producers" via the National Electrical Manufacturers Association

**III. Itron objects to officers of ANSI Committees, Sub-committees or Working Groups having a direct material interest in the ANSI Standards developed in that group or any sub-groups.**



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Itron objects to the ascension of Dr. Avygdor Moise, President of FutureDOS R&D, to the position of Chairman of ANSI C12.17 WG2. FutureDOS R&D has a direct material interest, via the stated aim of requiring successful completion of their fee-based compliance testing to obtain codes necessary for the implementation of ANSI C12.19 (and ANSI C12.22).

Dr. Moise introduced language in July 2001 (attached) that changes the applicability of ANSI C12.19 Annex A "DEVICE CLASS" codes.

In January or March 2002 (no official minutes or records), the "working document" was changed to reflect the final contribution, TF0107-061-3.

In April 2003, Dr. Moise presented his ANSI C12 registry contribution to ANSI C12.17, wherein FutureDOS is the only entity permitted to assign "DEVICE CLASS" codes for ANSI C12.19 "version 2". This exclusivity claim has been publicly repeated by Dr. Moise to industry stakeholders.

Dr. Moise has published a registration packet, wherein a fee-based test for "compliance", controlled exclusively and entirely by FutureDOS R&D, is required before the relative universal identifier ("DEVICE CLASS") codes will be assigned for ANSI C12.19 "version 2" devices. A similar process is available from FutureDOS R&D for ANSI C12.22 "security mechanism universal identifier algorithm" and "provider root application title universal identifier".

Itron believes that NEMA must take action with the working groups to ensure that all producers retain the ability to self-certify their products to all applicable ANSI standards. I welcome the opportunity to discuss Itron's concerns as we feel strongly that these are concerns for all producers impacted by the ANSI standard C12.19 (and C12.22).

Thank you for your time and consideration. Please advise if there are any questions.

Sincerely,

Richard A. Coblen  
Product Line Manager  
Itron, Inc.