



July 20, 2001



Mr. Michael J. Smith
ISO Central Secretariat
International Organization for Standardization (ISO)
1, rue de Varembe', Case postale 56
CH-1211 Geneva 20
Switzerland

RE: AFNOR PROPOSAL FOR NEW FIELD OF TECHNICAL ACTIVITY

Dear Mr. Smith:

In a May 14, 2001 letter to its Member Bodies, the ISO Central Secretariat asked each Member Body to comment on the proposal ISO/TS/P 194 Standardization of Service Activities Relating to Drinking Water Supply and Sewerage submitted by AFNOR, the French Standards Association. The U.S. ISO Member Body, ANSI, requested comments from the Water Environment Federation (WEF), the Association of Metropolitan Sewerage Agencies (AMSA) and several other U.S. organizations. This letter provides our organizations' perspectives on the AFNOR proposal in response to your May 14 letter and as requested by ANSI.

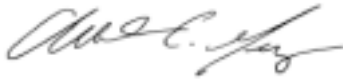
The AFNOR proposal is of concern to WEF and AMSA for a number of reasons. The proposal offered by AFNOR through ISO is based on existing French standards, which in some cases may not be appropriate starting points for international water and wastewater facility management standards, particularly as these operations are carried out in the United States. The documentation provided does not reference the extensive and ongoing related activities in the U.S. and other nations, examples of which we outline below. Further, the process by which a suggested standard becomes accepted for international use is resource intensive for those countries or organizations most likely to be affected by the standard. Significant effort and resources will be required to integrate the AFNOR proposal with the work currently underway in the U.S. For these reasons we question the value of the proposal as it relates to existing U.S. management practices.

Several activities ongoing in the U.S. require consideration before moving forward on the AFNOR proposal. AMSA and WEF along with the U.S. Environmental Protection Agency (EPA) have developed and are implementing an environmental management system (EMS) for municipal solids (biosolids). EPA, WEF and AMSA also recently initiated a two-year project to evaluate the implementation of utility-wide EMS programs at water and wastewater utilities. AMSA is developing guidelines and training for utilities. With the American Water Works Association (AWWA), WEF is a sponsor of the QualServe Benchmarking Clearinghouse that is planning to develop performance measures for utilities. AWWA plans to develop standards for various aspects of utility performance. Further, the AFNOR proposal may be inconsistent with the current U.S. approach to utility operation focused in large part on water quality protection.

In conclusion, we believe it may be prudent to delay efforts to develop international water and wastewater management and performance standards until current and planned U.S. resources are complete and available for integration. If a decision is made to go forward, WEF and AMSA request representation on any ISO Committee working in the areas described in the AFNOR proposal.

We hope that these comments are useful in your considered response to AFNOR. We welcome an opportunity to discuss our U.S. efforts with you at any time. Please feel free to contact us if you have any questions or need additional information.

Sincerely,



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*The Water Environment Federation is a not-for-profit scientific and educational organization made up of Member Associations located throughout the world. Our 38,000 members include engineers, scientists, wastewater treatment plant professionals, university professors, equipment manufacturers, and federal and state employees. WEF produces hundreds of publications (widely regarded as reflecting best practices in the fields of wastewater collection and treatment and storm water management) as well as the internationally known and used "Standard Methods for the Examination of Water and Wastewater." Standard Methods, produced through a partnership with the American Water Works Association (AWWA) and the American Public Health Association (APHA), is revised every three-to-five years and has been used by water and wastewater treatment facility laboratory analysts for over 80 years.

**The Association of Metropolitan Sewerage Agencies represents the interests of over 300 public agencies and organizations that have made the pursuit of scientifically based, technically sound and cost effective laws and regulations their objective. AMSA's public agency members serve the majority of the sewered population in the United States and collectively treat and reclaim more than 18 billion gallons of wastewater daily. AMSA maintains a key role in the development of environmental legislation, and works closely with federal regulatory agencies in the implementation of environmental programs.