Deadline of Submission of Comments: 26-May-25
Document Number: ANSI/ASB Std 076
Document Title: Standard for Training and Certification of Canine Detection of Human Remains: Human Remains on Land

Comment #	Document Section	Type of Comment E-Editorial T-Technical	Current Document Wording	Proposed Revision	Revision Justification	For Working Group and Consensus Body use only, not to be completed by commenter. Final Resolution
1	Overview: The Proposed Standard		responses allowed for the proposed standard, assuming the	SB's staff has declined to provide an illustrative computation o prescribed required number of sources and the prescribed middle in the prescribed middle in the prescribed middle in the canine community! I strongly encon NO until the information above is provided in a revised draft.	nimum number of search areas. This is essential information	Reject. Pass/Fail criteria are provided at the end of each individual assessment in Section 5, and also described in Section 6. Also, please note that the ASB Staff does NOT write the document, or the comment resolutions. The work on this document is all done by a Working Group and the Consesus Body.
2	Foreward 2nd Paragraph		The second sentence of the first paragraph states that this standard promotes consistency across organizations utilizing canines to detect human remains on land and relieves the judicial system of conflicting protocols. The first sentence in the fifth paragraph states, in part, the following: Given the lack of standardization in the maximum number of search areas, there will likely be a lack of standardization.	How can a proposed standard that lacks standardization and has not been validated relieve the judicial system of conflicting protocols?		This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
3	Forward - 3rd Paragraph	E	Starts with "Given the lack of validation	Put a comma after document. Or other gramatical change	Run on sentences.	This section was not a redline portion of the document, upon further review, the comment has been accepted.
4	Forward - 4th Paragraph	E	Starts with "The results of detection	Insert teams. Detection teams may be		This section was not a redline portion of the document, upon further review, the section was revised to read "The detection results"
5	Forward - 4th Paragraph	E	Starts with "A result	Change result to "A positive indication"		This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
6	Forward - 4th Paragraph	E	Starts with "Confirmatory testing	Take the sentence out.	Not needed because of statement above.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
7	Forward - 6th Paragraph	E	Starts with "The goal of this standard	take out the wording"at least as well" It should read. The goal of this standard is to encourage all canine teams to perform to this training /certification protocol requires and to minimize individual descretion on the part of handlers and examiners/assessors.		This section was not a redline portion of the document, upon further review, the language has been modified for clarification.
8	Forward - 6th Paragraph	E	Starts with "Standardization also leads	Place a period after canine teams. Remove "across time for a particular canine team"	You stated it when you typed canine teams.	This section was not a redline portion of the document, upon further review, the language has been modified for clarification.

9	Foreward 6th Paragraph		The sixth paragraph states the following (emphasis added): Standardized training protocols and certification criteria produce several benefits.	First, any canine detection teams that meet the criteria set forth in this training and certification standard have passed a predetermined minimum level of performance and have been required to follow a specific set of rules and guidelines to achieve that. Under the proposed standard, there is almost unlimited discretion on the part of the examiners/assessors regarding the total number of search areas above the prescribed minimum for Wilderness and Buried. There is an unlimited number of containers above the specified minimum for the odor recognition assessment, and an unlimited number of areas that are used for the optional assessments. This degree of flexibility does not facilitate the prescribed goal to minimize individual discretion on the part of the examiners/assessors. Moreover, no prescribed minimum level of professional training is required for examiners and assessors. As you are aware, human remains have a high vapor pressure and can travel significant distances, particularly when there are temperature differences. Accordingly, there should be a prescribed minimum level of training for the assessors/evaluators. See the comment below regarding the defined term 3.15 certifying official.	The goal of this standard is to encourage all canine teams to perform at least as well as this training/certification protocol requires and to minimize individual discretion on the part of handlers and examiners/assessors. Throughout this proposed standard, there are several references to evaluating the canine team's ability to locate human remains. The canines are locating the strongest concentration of the target odor signature emitted from the human remains substances. Please reflect this throughout the document.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
73	Definitions for terms	Т	Missing: Final Response which is in TR 25; Indication which is in TR 25	Need to add these terms to the Standard 076 because they are part of detection terminology		Reject. "Final Response" is not used in this document as a stand-alone term. "Indication" is only used in other definitions. Not in any requirements or recommendations.
74	Definitions for terms	Т	Missing: Distractor odor	Need to add these terms to the Standard 076 because they are part of detection terminology		Reject with modification. Occurrences of "Distractor Odor" within the body of the document have been revised to "distractors". Therefor "Distractor Odor" does not need to be added.
10	3.2	Т	Definition of Alert	Working Group 025 has new definition.	Need to be consistent with that verbiage.	This section was not a redline portion of the document, upon further review, the CB has opted to accept to keep the definition in line with the work being done on TR 025.
11	3.7	Т	Change Definition	Working Group 025 has new definition.	Need to be consistent with that verbiage.	This section was not a redline portion of the document, upon further review, the CB has opted to accept to keep the definition in line with the work being done on TR 025.
12	3.10		Burned Remains -	Please clarify whether an accelerant can be used to burn the human remains,	because there could be an overshadowing impact on the odor signature emitted from the remains. See comment set forth below on 4.1.4 f regarding burned teeth.	This section was not a redline portion of the document, upon further review the CB has opted to reject with modification. The definition was not revised. Clarification was added to Table 3 to address if an accelerant can be used to burn human remains.
13	3.15		Certifying Official -	Please include a similar definition as prescribed in 3.17, such as "who has demonstrated through education, training, or operational experience extensive skills and knowledge in the subject field or discipline."		This section was not a redline portion of the document, upon further review, the CB has opted to accept to keep the definition in line with the work being done on TR 025.

14	3.16	E	3.16 Change of Behavior (COB) COB A characteristic pattern of behaviors, as recognized by the canine handler, that may occur when the canine engages with odor—whether trained target odor or a similarly motivating non-target stimulus. These behaviors often precede a trained final response (TFR) and may include changes in breathing, posture, speed, or focus. However, similar patterns may be observed when a dog is interacting with other high-value distractions (e.g., food or novel odors). Because of this, COB alone should not be assumed to indicate detection of trained odor without the presence of a reliable TFR. The interpretation of COB requires context, training history, and environmental awareness. The pattern of behavior may be unique to each canine, and consistent observation over time strengthens the handler's ability to assess its relevance.	There is opportunity to strengthen and clarify the concept of "Change of Behavior" (COB) as presented in ASB 076. In practice, most handlers cannot reliably distinguish between a dog working a trained odor and a high-value distraction—such as a stick of cheese or a piece of hamburger—until the moment of the trained final response (TFR). In real-world training scenarios, a dog's behavior pattern while working food or other desirable stimuli often mirrors what is seen when working a trained odor. Try this as an exercise: collect 10 video clips—5 of dogs working trained odor and 5 working hamburger. Stop each video just before the TFR. Most handlers will not be able to identify with consistency which clips are true odor and which are distraction. The pre-TFR COB behaviors appear nearly identical.	While a well-trained dog may exhibit consistent COBs leading up to a TFR on target odor, it is important to acknowledge that dogs exhibit similar patterns when in pursuit of other valued items. The idea that COBs are unique to target odor and clearly distinguishable from other forms of olfactory interest may not reflect the full complexity of canine behavior in the field. By elevating the TFR as a meaningful differentiator—and acknowledging the potential overlap in pre-TFR behavior—we can better align training standards with operational reality and avoid unintentionally overstating the diagnostic value of COBs alone.	This section was not a redline portion of the document, upon further review, the CB has opted to accept to keep the definition in line with the work being done on TR 025.
15	3.25		Debris -	The definition includes solid waste such as household garbage, which is not a controlled environment to use for assessments or certification purposes.		This section was not a redline portion of the document, upon further review, the CB has opted to accept to keep the definition in line with the work being done on TR 025.
16	3.33	Т	False Final Response	There is no definition in TR 25 for Fals Final Response. What is this definition? Isn't it just a false response		This section was not a redline portion of the document, upon further review, the CB has opted to accept to keep the definition in line with the work being done on TR 025.
17	3.39		Human Remains -	Please revise the definition to the following: A body of a deceased person, parts of the body, human decomposition fluid, and blood outside of the body.		Reject. The definition as written is appropriate. Decompostion fluid and blood outside of the body are included in "parts of a human body".
76	4.00		Canine Team Requirements -	Delete and replace with the following: A person having the skills, knowledge, and experience to work with a human remains detection canine.	This section presents an overly prescriptive list of requirements, an all-things-considered approach rejected in Florida v. Harris.	Reject. Section 4 provides the minimum requirements with suitable flexability to account for different organizations and case law.
19	4.1.2c	Т	You removed IS 700	The FEMA NIMS system asks that IS-700 be a prerequisites for IS-800 which is listed. How does the ASB remove a prerequisite for a FEMA National Incident Management System requirements. IS 700 should be reinstated per requirements.		Reject. IS-700 is in the current draft of the document.
18	4.1.2e	Т	Hazard Materials Awareness course	There are so many different groups who give out certifications, can we state that a Federal Hazard Materials course because you could have a state hazard materials course. We should make if federally taught hazmat course due to inconsistency of different courses.		Reject. Mandating federal courses would be overly perscriptive when other courses can be suitable within a local jurisdiction.
20	4.1.3 (Note) and all other Notes with this verbiage	Т	Note: Human sweat, aliva, vomit, urine, feces, and semen are not considered human decomposition fluid as they are produced outside of the decay process.	Semen is produced outside the decay process, but semen has a specific Chemical that has the same chemical that has the same human decomposition fluid. Meaning this specific chemical is also part of the decomposition.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
21	4.1.3 e note	E	NOTE Human sweat, saliva, vomit, urine, feces, and semen, finger/toe nail trimmings, and hair trimmings are not considered	Note should be updated to include full scope added in the other notes		This section was not a redline portion of the document, upon further review the CB has opted to accept, as this was missing from this note to make it consistent with the other notes in the document.
77	4.1.4		Terms d, e, and f,	please clarify whether they may be burned without utilizing accelerants to minimize the potential overshadowing effects of the accelerants.		Reject. See Table 3
78	4.2.1.5 and 4.2.1.7		Why is a whole body mentioned in both areas?			This section was not a redline portion of the document, therefore the CB has voted to not address this comment.

					T	
79	4.2.1.7			Section 4.2.1.8 states that training shall be structured to meet the typical mission requirements of the canine team's organization; then so should the training aids they utilize to maintain their readiness for their mission.	Different canine teams have different missions, and the exposure to the size of the human remains and the spectrum of decomposition should be consistent with the respective team's mission. Also, the mummification of human remains will likely relate to specific geographic regions.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
22	4.3.4	Т	At the end of the sentence, there is verbiage inside the parenthesis (see Sections 5,6, and 7)	What does Section 7 have to do with Initial Training of the Canine Team. The Section 7 should be removed because it is Maintenance training. The initial training does have assessments towards certifications. Maintenance comes after initial training.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
80	5.5 and 5.5.1			They should be modified to conform to the aforementioned comment for 4.2.1.7.		Reject. The training aid(s) in section 5.5.1 are examples and not all are required.
81	5.6		A minimum of 0.5 pounds of training aid(s) shall be utilized for buried operational assessments, and a minimum of 0.03 pounds of training aid(s) shall be utilized for all other assessments.	To maximize available odor, please change the wording to the following: The Buried areas training aids shall have a minimum of 0.5 pounds of tissue and fluid.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
82	5.6			Please see my subsequent comments herein on the minimum of 0.3 pounds of training aids shall be used for all other assessments.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
23	5.7	Т	"Nonparticipating canine team should be walked trhough the assessment area"	What is the meaning of "Walked" is that for a distraction odor of a human and canine placing their odor into the search area as a distraction odor? Is the meaning of "Walked" to have the nonparticipating canine complete a search to see if the aids are in a good search area location. Walked means differently for other groups. Need to rephrase the sentence, remove the sentence or clarify the meaning as in a Note: This is not my suggestion but the Working Group decision!		This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The commenter should be aware that the existing NOTE addresses this comment.
24	5.8	E or T	Why do we need to have 5.8	If you are trying to state that 5.8.1 is Single Blind and 5.8.2 is Double Blind, put it into the description. Just don't put it alone because it reads as a redunit statement.		This section was not a redline portion of the document, therefore the CB has voted to maintain this numbering and organization for consistency.
25	5.8.1.1 page 16	E	#NAME?	on the bottom of page 16 is a bold 5.8.1.1 don't need to say this sentence because in 5.8.1.1.2 it states the odor recognition assessment consists of the following components and parameters. More language that is not needed and confusing.		This section was not a redline portion of the document, therefore the CB has voted to maintain this numbering and organization for consistency.
26	5.8.1.1.1 (a)	Т	Remove non-trained odor	This word is not in TR025, ST076, change the wording to "distractor" odor.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that "distractor" would be too limiting of a word here.
27	5.8.1.1.2 (b)	Т	The canine handler shall not know the total number of training aids	ATF NORT Test (which is recognized by the courts)states there are 60 containers and 20 odors. Why are we not giving the number of training aids. IF in 5.8.1.1.2 (a) we are stating that the canine handler shall be advised of the parameters of the assessment. Parameters are the number of training aids in this amount of containers. If they read the ASB rules it shows we have 6 containers - 4 will be have a training aid. That means they know there are 2 blank or filled with distractor odor. If we say we want 10 containers with 5 training aids this does not give the handler an advantage.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment.

28	5.8.1.1.2 (d)	Т	The canine handler shall not know the correct outcome of the assessment	Redundit statement. Has no meaning to the assessment. Of course the handler does not know the outcome, that is why he is testing. Means nothing in the statement.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that this is needed as it is a base-level requirement so it must be there so all users of the document are following the same requirements.
29	5.8.1.1.2 (e)	Т	The sentence talks about assessor may tell immediately after the handler determines the canine has made its trained final response, or at the conclusion of the entire assessment	This should read that the assessor immediately tells the handler. If the assessor waits, then over the entirety of the assessment the handler might reward the trained final response on distractor odors and teach the canine to give final trained response on this odor. The assessor should immediately confirm or deny the training odor is in the container to prevent any bad training. If the team fails the odor assessment then perform training.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that this second sentence is not a requirement or recommendation, it is a "may" statement.
83	5.8.1.1.2 e)			. The comparison shall be done immediately after the handler determines the canine has made its trained final response.	Waiting until the end of the assessment to the conclusion will cause unnecessary confusion for the canine when it isn't on a variable reward system	This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that this second sentence is not a requirement or recommendation, it is a "may" statement.
30	5.8.1.1.2 (f)	т	A minimum of six sample containers shall be used.	ATF NORT Set - 15 containers and 5 odors. There needs to be more distractor odors for the assessment for this standard.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that ATF NORT has numerous more odors tested which is why they have an overall increase in the number of containers.
32	5.8.1.1.2 (f)	Т	A minimum of six sample containers shall be used.	This needs to read. A minimum of six sample containers shall be used for each training aid. Many assessors or handlers will read the main sentences and will not review the detailed information. For example in this section the detailed section paragraph is (4) whic in the last 2 sentences is states in the example if you use 3 training aids then you need 18 containers.	Many will miss read this portion.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
84	5.8.1.1.2 f)			There should be a prescribed number of boxes to be utilized otherwise there is no standardization between evaluators.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that the odor recognition is standardized, allowing for evaluators to increase the number of training aids used in the odor recognition, as they see fit.
31	5.8.1.1.2(f) (3)	Т	Containers should not be sealed or have lids and allow for odor to be readily available	Why are we not protecting the training aids. If you don't use a lid, there is a high probability that the canine will lick, touch, or swallow the training aid. You can add a lid to a box, container, or paint can by making holes (Use a set number of holes that will emit the odor for the canine to give a trained final response.		This section was not a redline portion of the document, upon further review, the CB has accepted this comment and the sentence has been revised to read: "Containers shall not be sealed or have lids which prevent odor from being readily available."
85	5.8.1.1.2 f) 5			A set number of distractors should be prescribed to enhance the consistency of the evaluation.	An unlimited number of distractors will not lead to standardization between assessors.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
86	5.8.1.1.2 g)			Change the wording to the following: The assessor shall arrange the sample containers in a way that minimizes cross-contamination between the containers.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that the minimization of contamination is covered in 5.8.1.1.2 f) 2)

	1			T	<u> </u>	
87	5.8.1.1.2 h)			When the size of the target substance is significantly smaller than the distractor, coupled with the an extremely short set time the odor picture will likely make detection of the target odor signature significantly more difficult (e.g., it appears the size of the distractors is unlimited to the size of the container). At a minimum, 5.8.1.1.2 i) should be changed to allow the canine team to search the containers three times. Also, 5.8.1.1.2 k) 2) would need to be modified as well.		Reject. This section is consistent with existing discipline standards, and has been tested.
88	5.8.1.1.2 h)			Having an unlimited size of the distractor significantly increases the probability of cross contamination with the odor signature.	This potential cross contamination of the odor signature is a fatal flaw in the prescribed design of the odor recognition for this certification. In addition, the standard does not prescribe how long the distractors should be present prior to running the odor recognition assessment.	Reject. The contamination is covered in 5.8.1.1.2 f) 5). How long distractors are out is up to the evaluators.
89	5.8.1.1.2 j)			The wording is incorrect when the number of containers is ten or more. See ASB Standard 088. Accordingly, consider deleting 5.8.1.1.2 j) because 5.8.1.1.2 k) 3) seems to address the same matter.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that while Std 088 prescribes the calculation for the pass/fail rate, individual disciplines can dictate a pass/fail rate that superscedes the requirements in Std 088.
90	5.8.1.1.2 k) 4)			If the canine's trained final response is an aggressive alert, then that is what 5.8.1.1.1 e) is prescribed, what the canine should exhibit in the presence of the target odor. When a canine has an aggressive trained final response, the assessor should have the canine team run the odor recognition after all the passive alert canine teams.		This section was not a redline portion of the document, upon review, the CB has opted to make a modification for clarification, d) biting, scratching, or aggressively disturbing the training aid. Was added to 4.2.1.3.
33	5.8.1.1.2 (k)(4)	Т	Biting, scratching and / or aggressively disturbing a placed training aid	In Section 4.2.1.4 the standard talks about Initial Training of Canine and this section say to perform a predetermined specific trained final response (ACTIVE or passive). When we get to this assessment section 4 you have stated the team is a FAILURE of the odor recognition assessment includes: Biting, scratching, and or aggressively giving final trained response. It should say if the team states they are a passive response then you could be a failure of the odor recognition assessment if there is biting, scratching and / or aggressively disturbing.		This section was not a redline portion of the document, upon review, the CB has opted to make a modification for clarification, d) biting, scratching, or aggressively disturbing the training aid. Was added to 4.2.1.3.
34	5.8.1.2	E	This verbiage needs to be removed.	Upon searching this standard, I could not find 5.9.1.2.1 - 5.9.1.2.12		Probably needs to be 5.8.8.2.1 through 5.8.1.2.12?? Fixed.
35	5.8.1.2.1 (a)	E	"discriminating from non-trained odor/scent"	Remove non-trained odor/scent this is not in TR25 or ST 76. Changte to distractor odor / scent		This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that "distractor" would be too limiting of a word here.
91	5.8.1.2			It appears the reference to 5.9.1.2.12 is incorrect.		Accept.
92	5.8.1.2.1 a)			Having an unlimited number of distractors, coupled with no uniformity in the size of the distractors or when they shall be placed, no limit in the number of containers, this will not lead to a reasonable degree of standardization among assessors.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that the operational assessments are standardized, allowing for evaluators to increase the number of training aids, areas, boxes, distractors used.

93	5.8.1.2 and 5.8.1.2.1		The wording "operational assessment" is confusing and should be clarified.	I believe Certification Assessment per Section 6 would be more appropriate.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that the operational assessment is a part of the certification, so the label is appropriate. As stated in 5.1 "Assessments shall be part of certification, maintenance training, and proficiency testing."
94	5.8.1.2.1 a)		See the Forward, which states the following (emphasis added): "While the proposed standard has not been validated, there is research that provides evidence that standardized training and testing increases consistency and reliability. Standardization can advance our ability to research specific aspects of training in combination with specific detection purposes."		This will lead to a lack of standardization when there is an unlimited ability to add distractors.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that the operational assessments are standardized, allowing for evaluators to increase the number of training aids, areas, boxes, distractors used.
36	5.8.1.2.2	Т	Rewrite sentence	The assessor shall observe the canine team. The assessor shall advise the handler immediately after the handler determines the canine has made its trained final response.	(This is a training issues, if the assessor does not immediately notify handler then the canine could learn to give indication on a distractor odor whether it is natural or other distractor odor (s).	Reject: This third sentence is not a requirement or recommendation, it is a "may" statement. This is left up to the assessor, if it is a requirement it introduces the possibility of bias.
95	5.8.1.2.2			Accordingly, please revise the third sentence to the following: The assessor shall advise the handler of the comparison immediately after the handler determines the canine has made its trained final response.	A significant number of Human Remains Detection canines are on a continuous rate of reinforcement, especially earlier in their careers.	Reject: This third sentence is not a requirement or recommendation, it is a "may" statement. This is left up to the assessor, if it is a requirement it introduces the possibility of bias.
37	5.8.1.2.3	Т	" The parameters of the assessment, yet shall not know the desired outcome."	Again why are we not telling the handler. The desired outcome is to find the correct training aids. Remove everything after yet		This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
38	5.8.1.2.4	Т	The canine handler shall not know the number of training aids	There is no documentation that if the handler knows the number of training aids that this will help him pass. He still has to find the total number of training aids in the totality of the assessment.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
39				There is no definition in TR 25 or ST76 for artificial		Accept with modification. "artificial" was removed from the
33	5.8.1.2.7	Т	Artificial Distractions in this sentence		We must keep it consistent with the other definitions.	•
40	5.8.1.2.9	Т	Artificial Distractions in this sentence Successful completion	distraction. This 90% should include misses and false final responses. There needs to be a chart completed for the voting members to see what the parameters of successful completion of an assessment or certification. There is guidance about this in ST 88. It is not the assessor immediate function to go back and calculate these formulas. It is simple, many organizations count false final responses as wrong. There should not be a difference between misses and false final responses. This will have an adverse affect on the courts. There is distinct verbiage in court cases about this passing. We are doing a diservice to this organization if we count the false final responses different from a miss. They are equal in this incident.	We must keep it consistent with the other definitions.	This section was not a redline portion of the document, upon further review, this section has been modified to clarify the pass/fail criteria. Standard 088 is currently going through a revision and the guidance will be clarified.
				distraction. This 90% should include misses and false final responses. There needs to be a chart completed for the voting members to see what the parameters of successful completion of an assessment or certification. There is guidance about this in ST 88. It is not the assessor immediate function to go back and calculate these formulas. It is simple, many organizations count false final responses as wrong. There should not be a difference between misses and false final responses. This will have an adverse affect on the courts. There is distinct verbiage in court cases about this passing. We are doing a diservice to this orgainzation if we count the false final responses different from a miss. They are equal in	We must keep it consistent with the other definitions. The requested change is necessary because there are continuous searchable areas under the proposed standard.	sentence. This section was not a redline portion of the document, upon further review, this section has been modified to clarify the pass/fail criteria. Standard 088 is currently going through a
40	5.8.1.2.9			distraction. This 90% should include misses and false final responses. There needs to be a chart completed for the voting members to see what the parameters of successful completion of an assessment or certification. There is guidance about this in ST 88. It is not the assessor immediate function to go back and calculate these formulas. It is simple, many organizations count false final responses as wrong. There should not be a difference between misses and false final responses. This will have an adverse affect on the courts. There is distinct verbiage in court cases about this passing. We are doing a diservice to this orgainzation if we count the false final responses different from a miss. They are equal in this incident. Please revise the wording to the following: Successful competition of the operational assessment requires the canine team to achieve at least a 90% positive trained final rate when a target substance is present, combined with a false final response rate as defined in ANSI/ASB Standard	The requested change is necessary because there are	This section was not a redline portion of the document, upon further review, this section has been modified to clarify the pass/fail criteria. Standard 088 is currently going through a revision and the guidance will be clarified. This section was not a redline portion of the document, upon further review, this section has been modified to clarify the pass/fail criteria. Standard 088 is currently going through a

98	5.8.1.2.12.1 a) and b)			This will lead to a lack of standardization when there is an unlimited ability to add areas. See the Forward, which states the following (emphasis added): "While the proposed standard has not been validated, there is research that provides evidence that standardized training and testing increases consistency and reliability. Standardization can advance our ability to research specific aspects of training in combination with specific detection purposes."	Reject. For a minimum standard, the space must be defined.
99	5.8.1.2.12.1 f) et al			There is a prescribed minimum target substance of 0.03 pounds to be utilized for the wilderness assessments. Section 5.5.1 of the proposed standard includes teeth. Moreover, 0.03 pounds of teeth, including burned teeth, could be placed, and possibly elevated, within a 43,560 square feet area, which is foolish given the restrictive time restraints to conduct the sniff!	This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
100	5.8.1.2.12.1 f) et al			Please modify the first sentence in section 5.6 to read as follows: A minimum of 0.5 lb (227 g) of training aid(s) shall be used for wilderness and buried assessments.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
42	5.8.1.2.12.1 h	E	The number of training aid(s) per individual search area shall be determined by a random number generator or the assessor's discretion based on the individual search area's constraints.	missing "on the"	This section was not a redline portion of the document, therefore the CB has voted to not address this comment. Fixed.
43	5.8.1.2.12.1 (h)	Т	" training aid per indicidual search area shall be determined by a random number generator"	Can you determine which random number generator to have the assessor use because there are True Random Number Generators (TRNGs) or Pseudorandom Number Generators (PRNGs) is there a mathmatical formula for a assessor to input the numbers in to get these random number generator. No practioner or certifying association has the formula. Need to remove this statement and only state at the Assessor's discretion based individual search area's constraints. This is unlikely to be followed by any association for Human Remains Detection Assessment or Certification.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that a random number generator can be found through any internet search engine.
101	5.8.1.2.12.1 j)			This proposed standard should limit the number of elevated target substances to two to mitigate the potential for the canine becoming fixated on elevated substances.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
44	5.8.1.2.12.1 (L)	Т	The assessment should not take more than 30 min per individual search area additional time The assessor shall notify the canine team of the maximum search time prior to beginning the assessment.	If you give standard time limits and then let the assessor add time due to all the environmental challenges then how can the search time prior to beginning of assessment be given correctly. Make the search area time limit to not exceed 1 hour as long as the canine team is still working to complete the search. In other parts of the standard, it should be at the assessors discretion.	Reject. This section is a recommendation (should). Additionally, based on comments in previous rounds of ballot/public comment, the last sentence was added for extenuating circumstances.
102	5.8.1.2.12.1)			Please modify the last sentence to the following: The assessor shall increase the time allotment if environmental factors adversely impact the dispersion of the odor plume, or an unplanned event or circumstances affect a specific team during the assessment, including but not limited to safety considerations, such as weather hazards, animals, or other safety matters.	Reject. This section is a recommendation (should). Additionally, based on comments in previous rounds of ballot/public comment, the last sentence was added for extenuating circumstances and the "may" in this section has been agreed upon by the CB.

				This will lead to a lack of standardization when there is an		
103	5.8.1.2.12.2 a) and b)			unlimited ability to add areas. See the Forward, which states the following (emphasis added): "While the proposed standard has not been validated, there is research that provides evidence that standardized training and testing increases consistency and reliability. Standardization can advance our ability to research specific aspects of training in combination with specific detection purposes."		Reject. For a minimum standard, the space must be defined.
45	5.8.1.2.12.2 c	E	Each individual search area shall not share boundaries with one another to minimize overlap of the target odors between individual searches.	assessment above is training aid odors vs target odors pick one and stick with it		This section was not a redline portion of the document, upon further review, section 5.8.1.2.12.1 has been fixed to "target odors" for consistency.
46	5.8.1.2.12.2 g	E	The number of training aid(s) per individual search area shall be determined by a random number generator or the assessor's discretion based on the individual search area's constraints.	missing "on the"		This section was not a redline portion of the document, upon further review, this has been fixed.
47	5.8.1.2.12.2 (g)	Т	Random number generator	Remove Random number generator and use at the assessor's discretion.	Same reason as stated NUMBER 32	This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that a random number generator can be found through any internet search engine.
48	5.8.1.2.12.2 (L)	Т	Assessment should not take more than 30 minutes	If you give standard time limits and then let the assessor add time due to all the environmental challenges then how can the search time prior to beginning of assessment be given correctly. Make the search area time limit to not exceed 1 hour as long as the canine team is still working to complete the search. In other parts of the standard, it should be at the assessors discretion.		Reject. This section is a recommendation (should). Additionally, based on comments in previous rounds of ballot/public comment, the last sentence was added for extenuating circumstances and the "may" in this section has been agreed upon by the CB.
104	5.8.1.2.12.2 l)			Please modify the last sentence to the following: The assessor shall increase the time allotment if environmental factors adversely impact the dispersion or the availability of the odor plume (snow or significant rainfalletc.), or an unplanned event or circumstances affect a specific team during the assessment, including but not limited to safety considerations, such as weather hazards, animals, or other safety matters.		Reject. This section is a recommendation (should). Additionally, based on comments in previous rounds of ballot/public comment, the last sentence was added for extenuating circumstances and the "may" in this section has been agreed upon by the CB.
105	5.8.1.2.12.3			The areas prescribed are not controlled environments and can be contaminated with human remains. They should not be used for assessments or certifications.		Reject. Unfortunately we can't control the areas dogs are searching, but teams are often deployed to these locations. We need to define assesments for this operational area.
106	5.8.1.2.12.3 a)			See the Forward, which states the following (emphasis added): "While the proposed standard has not been validated, there is research that provides evidence that standardized training and testing increases consistency and reliability. Standardization can advance our ability to research specific aspects of training in combination with specific detection purposes."	This will lead to a lack of standardization when there is an unlimited ability to add areas.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that for a minimum standard, the space must be defined.
107	5.8.1.2.12.3 e)			See earlier comment regarding the unlimited number of elevated target substances.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
108	5.8.1.2.12.3 h)			Please modify the last sentence to the following: The assessor shall increase the time allotment if environmental factors adversely impact the dispersion or the availability of the odor plume (direct sunlight, wind speedetc.), or an unplanned event or circumstances affect a specific team during the assessment, including but not limited to safety considerations, such as weather hazards, animals, or other safety matters.		Reject. This section is a recommendation (should). Additionally, based on comments in previous rounds of ballot/public comment, the last sentence was added for extenuating circumstances and the "may" in this section has been agreed upon by the CB.

109	5.8.1.2.12.4 a)	This will lead to a lack of standardization when there is an unlimited ability to add areas. See the Forward, which states the following (emphasis added): "While the proposed standard has not been validated, there is research that provides evidence that standardized training and testing increases consistency and reliability. Standardization can advance our ability to research specific aspects of training in combination with specific detection purposes."	This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that for a minimum standard, the space must be defined.
110	5.8.1.2.12.4 e)	See earlier comment regarding the unlimited number of elevated target substances.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
111	5.8.1.2.12.4 h)	Please modify the last sentence to the following: The assessor shall increase the time allotment if environmental factors adversely impact the dispersion or availability of the odor plume (direct sunlight on a hot wall, etc.) or if an unplanned event or circumstances affect a specific team during the assessment, including but not limited to safety considerations.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that this section is a recommendation (should). Additionally, based on comments in previous rounds of ballot/public comment, the last sentence was added for extenuating circumstances and the "may" in this section has been agreed upon by the CB.
112	5.8.1.2.12.5	Trash piles are not a controlled setting that can contain human remains.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that unfortunately we can't control the areas dogs are searching, but teams are often deployed to these locations. We need to define assesments for this operational area.
113	5.8.1.2.12.5 a)	This will lead to a lack of standardization when there is an unlimited ability to add areas. See the Forward, which states the following (emphasis added): "While the proposed standard has not been validated, there is research that provides evidence that standardized training and testing increases consistency and reliability. Standardization can advance our ability to research specific aspects of training in combination with specific detection purposes."	This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that for a minimum standard, the space must be defined.
114	5.8.1.2.12.5 g)	The set time appears inappropriate because teeth or dry bone could be buried 12 inches below the surface, the depth is deeper than the prescribed minimum for buried substances, and has a shorter set time. In addition, the training aid may be smaller than the prescribed buried substance.	This section was not a redline portion of the document, upon further review this has been accepted with modification. Added to all operational serarch areas. Note the set time can be increased depending on the complexity of the concealment and the training aid used.
115	5.8.1.2.12.5 h)	Please insert the following after the first sentence: The assessor shall increase the time allotment if environmental factors adversely impact the dispersion or availability of the odor plume (direct sunlight on a hot wall, etc.) or if an unplanned event or circumstances affect a specific team during the assessment, including but not limited to safety considerations.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that this section is a recommendation (should). Additionally, based on comments in previous rounds of ballot/public comment, the last sentence was added for extenuating circumstances and the "may" in this section has been agreed upon by the CB.

116	5.8.1.2.12.6 h)			Please insert the following after the first sentence: The assessor shall increase the time allotment if environmental factors adversely impact the dispersion or availability of the odor plume (direct sunlight on a vehicle, high winds crosscontaminating vehicles with the odor of human decomposition, etc.) or if an unplanned event or circumstances affect a specific team during the assessment, including but not limited to safety considerations.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that this section is a recommendation (should). Additionally, based on comments in previous rounds of ballot/public comment, the last sentence was added for extenuating circumstances and the "may" in this section has been agreed upon by the CB. This section was not a redline portion of the document,
49	5.8.1.2.12.3 (d)	Т	Random number generator	Remove Random number generator and use at the assessor's discretion.	Same reason as stated NUMBER 32	therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that a random number generator can be found through any internet search engine.
50	5.8.1.2.12.3 d	E	The number of training aid(s) per individual search area shall be determined by a random number generator or the assessor's discretion based on the individual search area's constraints.	missing "on the"		This section was not a redline portion of the document, upon further review this has been accepted.
52	5.8.1.2.12.4(B)	Т	Search area shall be a minimum which may include multiple rooms.	Let the standard show that there are 6 rooms or what ever number of rooms you decide. Then the assessor can put 0 through 2 hides in this room. Make it simple by giving number of average size rooms, instead of giving a square footage number. Some assessors will not spend the time getting the measurements of each room. This then changes the standard and not keeping it consistent when one assessor does it one way and other assessors do it a different way.	When you make it simple by giving the number of rooms, this also shows how many blank rooms could be in the assessment.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that the minimum space defines the total amount of space within the building and not the individual rooms.
51	5.8.1.2.12.4(d)	Т	Random number generator	Remove Random number generator and use at the assessor's discretion.	Same reason as stated NUMBER 32	Reject. A random number generator can be found through any internet search engine.
53	5.8.1.2.12.5 (b)	Т	Light Debris	Stating a 1000 ft squared is not simple enough for anyone to visualize in the field. If you state 25 ft X 40ft which is 1000 ft squared it makes it more visible to the assessor or handler. This is making it more acceptable to handlers. Just state in terms of 50 ft X 50 ft. as an example.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that this section already clarifies the minimum size to be searched
54	5.8.1.2.12.5 (d)	Т	Random number generator	Remove Random number generator and use at the assessor's discretion.	Same reason as stated NUMBER 32	This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that a random number generator can be found through any internet search engine.
55	5.8.1.2.12.5 d	E	The number of training aid(s) per individual search area shall be determined by a random number generator or the assessor's discretion based on the individual search area's constraints.	missing "on the"		This section was not a redline portion of the document, upon further review, this comment has been accepted.
56	5.8.1.2.12.5 e	E	If the individual search area contains two (2) training aids then each training aid shall be separated by a minimum of ≈ 33 ft (10 m) or shall be placed in such a manner to mitigate the possibility of target odors being encountered at the same time.	missing update for mitigation of the possibility of target odor being encountered at the same time, it's 10 m not 6		This section was not a redline portion of the document, upon further review, this comment has been accepted to fix error.

57	5.8.1.2.12.6 (h)	Т	This assessment should take no more than 2 minutes	Are we training to standards or to time. Why do we have to put in 2 minutes per vehicle. If a handler runs the problem on the downwind side, then he scans and then goes into a detailed search. Are we timing when he gets on a vehicle or during the search of the vehicles he has a minimum of 10 minutes. Time is difficult to keep a standard. State in the standard that if the team is not conducting a productive		This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
58	5.8.2.4	т	Talks about notifying the handler at the indication of the final trained response or at the end of the entire assessment	search then the assessment can be terminated. How can this be performed if this is a Double Blind Test. This should read that the assessor immediately tells the handler. If the assessor waits, then over the entirety of the assessment the handler might reward the trained final response on distractor odors and teach the canine to give final trained response on this odor. The assessor should immediately confirm or deny the training odor is in the container to prevent any bad training. If the team fails the odor assessment then perform training.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that the last sentence in the section is a "may" statement and depending on how the double-blind assessment is created (e.g., twoway radio communication), is possible.
59	5.8.2.5	Т	The canine team should be required to complete a double-blind assessment every six months.	Says WHO? Is there a court case that mandates this, why are we saying shall and mandating this to be performed every six months. REMOVE THIS STATEMENT	As this will affect teams in the industry by court records if the judicial system accepts all these standards. Don't affect the industry based on opinions	This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that this section is a "should" statement, it is not a requirement.
60	6.4 Table 1	Т	Required assessments need more required	Meaning that if you state this is based on operational deployments then you are not mandating enough assessment areas. Most teams who deploy for agencies need to have an assessment with Motor Vehicles. Some teams never do wilderness they would do Urban Exteriors instead. Mandatory should include buried and odor recognition. Then add the correct assessments for the operational deployment of the selected teams to be inputed by the assessor or certifying body.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that there is no limitation for certification bodies to require more than the minimum required assessments in this document.
117	6.5			See comment per 5.8.1.2.12.5 g) regarding a buried substance within Light Debris.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
119	6.5.1.2 c)			The paragraph thereafter. Throughout this proposed standard, there are several references to evaluating the canine team's ability to locate human remains. The canines are locating the strongest concentration of the target odor signature emitted from the human remains substances.	When there are elevated target substances, buried substances on slopes (the odor plume may be below the surface of the earth), target substances on hot walls or metal surfaces with direct sunlight, the odor plume may be above the canine's height, and they cannot directly trace the odor plume to the target substances. Accordingly, the paragraph, as mentioned earlier, should be modified.	Reject. There is no 6.5.1.2 c) in this document. The working group believes this comment is referring to the final paragraph on 6.7. The certifying official has flexibility if the buried odor is coming out in an unexpected location.
118	6.5.4			Obtaining human remains is extremely difficult, and this requirement is currently unrealistic. Please delete the comment.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
61	6.5.4	Т	Training aids used in the certification process should not have been used in the training activities	Not viable due to ability to obtain training aids. Many organizations rely on the HRD teams to bring their own aids for certification. This standard states if a handler brings the aids for the organization then they are not allowed to certify. The word SHOULD needs to be changed. Can state in standard not recomended or try to avoid as much as possible.	Organizations don't have training aids in stock.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
62	6.5.5	Т	Certification shall not take place in areas	Remove this section. OR SIMPLY take it out of the standard.	Many training areas in the real world are where the teams train because they have an agreement with the locations. Just put in the assessor is notified of location of placement of aids over past 2 weeks to mitigate any discrepencies.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment.

63	6.7 (b)	т	Successful certification	Locate minimum of one buried find, what if the assessor picks only the minimum of 1 aid for the 2 search areas. In one search area is 0 finds and the other is 1 and the team misses that find, but then locates all the wilderness finds and optional finds they locate all then the team fails because the assessor failed to put 2 hides out so the outcome could be successful. WHERE DOES IT STATE HOW MANY OPTIONAL ASSESSMENTS COUNT FOR CERTIFICATION. THERE IS NO NUMBER FROM MY READING.	WE need a chart for all assessors and certifying organizations to read and comply. This is not good for the industry!	This section was not a redline portion of the document, therefore the CB has voted to not address this comment. The CB would like the commenter to be aware that this statement b) applies only to the buried operational assessment, criteria for all other assessments is contained in 6.7 c)
64	6.7 (C)	т	Complet the remaining required by STD 88	This makes no sense. Why is the calculations not in this standard. You are telling a certifying organization that they have to go to ST 88 to calculate the numbers. IF I DO THE NUMBERS, YOU COULD HAVE 8 FALSE INDICATIONS AND STILL PASS. THE FALSE ALERT SHOULD COUNT AS A MISS AND BE COUNTED INTO THE OVERALL 90% CALCULATION. THE ASSESSOR DOES NOT NEED TO COUNT POSITIVE ALERT RATE (WHICH SHOULD BE POSITIVE FINAL RESPONSE NOT ALERT) THEN GO AND DO A CHART FOR FALSE ALERT RATE NOT TO EXCEED 10%. NOT FUNCTIONAL IN THE CERTIFYING ORGANIZATIONS. WE HAVE ORGANIZATIONS THAT HAVE A 70%. ALSO ADD A CHART FOR REVIEW OF THIS STANDARD 076 based of ST 88 put it into the Standard for all to review instead of going back and forth.		Accept with modification. The section has been revised to read: "complete the remaining required and selected optional assessments achieving at least an overall 90% positive trained final response rate as defined and calculated in ANSI/ASB Std 088, combined with a no false final response(s) rate not to exceed 10% as defined and calculated in ANSI/ASB Std 088 and within the specified search time."
65	Between 6.7(c) and 6.8	т	The canine teams should be able to locate all training aid within 3ft from the source without	What if the assessor/ certifier puts the odor up at 6ft and the wind is blowing 15mph. With a 30 min set time and this team doesn't run for an hour and half. The canine team would probably give final response farther than 3 ft. From this standard the team is a miss. yes you put barring environmental conditions, but you have given a definitive mandate on distance. Why not put in standard at the discretion of the assessor to determine based on environmental conditions.	Don't tighten the parameters let there be space for decision by the assessor.	Reject with modification. This is now section 6.8 and the certifying officials have discretion with environmental conditions.
66	Between 6.7(c) and 6.8	E	NEED TO MAKE IT A numbered section or state NOTE: like in other sections of STANDARD			Accept.
67	6.8 (b)	Т	Allowing canine outside of the search area unless the canine is actively following target odor	JUST REMOVE THIS SECTION	When teaching a handler to complete and area search, you don't teach them to start at the boundary. You teach then to start away from the boundry and complete the search pattern moving into the wind for optimal search pattern search.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
120	6.8 b)			Please revise section 6.8 b) to reflect the above comment.	To maximize the probability of detection, the canine must search outside the search area because a target substance could be on or elevated near the boundary. The assessor should provide plenty of space between areas so the canine team can effectively clear the boundaries of the designated search area.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
68	6.8 (d)	Т	Bite and / or dig	Remove wording	This agains bans Active Indication dogs because they bite or scratch at source.	This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
121	6.8 d)			Active alert canines will likely disturb the target substances. Accordingly, the certifying official or assessor should control the order in which they work within the certification or assessment.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
69	Between 6.11 and 6.12	Т	"Certifying official shall identify the performance deficiency to the canine handler so that the TRAINER	Remove Trainer and put handler. We assume that all teams has a trainer that will help the team. Many HRD Handlers complete the training on their own and do not have a trainer. Or the handler is the trainer. So just use the word handler.		This section was not a redline portion of the document, therefore the CB has voted to not address this comment.

70	Between 6.11 and 6.12	E	NEED TO MAKE IT A numbered section or state NOTE: like in other sections of STANDARD			This section was not a redline portion of the document, upon further review, for clarification, the paragraphs for (now) 6.12 have been merged to be one requirement/section.
71	Between 7.3 and 7.4	E	Supervised training by a competent trainer is required	Why is this standard requiring supervised trainer. Many handlers can complete mission deployment without supervised trainer time. IT should read "it is recommended that a team trains with a competent trainer to improve, but not say required!		This section was not a redline portion of the document, upon further review, the second paragraph has been revised and converted to a NOTE.
72	7.7	Т	Section not needed	Remove it, it is not the ASB or other organization to say shall. THIS WHOLE STANDARD IS TO CONTROLLING. NEED TO MAKE SIMPLIFY the STANDARD		This section was not a redline portion of the document, therefore the CB has voted to not address this comment.
75	Weights	Т	Teeth in the standard	We are saying a minimum of 15g of teeth could be used by an assessor in the wilderness search with an assessor using 2 acres and you are only allowed 30 minutes. What is the probability of a team passing this standard. Also if those teeth are burned, then there is a low threshold of the odor. This is not effective standard!		Reject. Buried assessments require a minimum of 0.5 lb, all other assesments are a minimum of 0.03 lb. This is reasonable about for the assessments.
122	Table 3, all stages, notes column	E	double period after citation 19	remove one period and extra spaces		Accept.
123		Ballot Comment	It may be wise to include a caveat that once ASB 025 defined. Why can't ASB 076 be altered to put Certification section document." Why? Why note that the second section of the second se	1. There is no requirement by the ASB that they document needs to wait 4/5 years. If the CB is willing to revise it sooner, it can be done. 2. In order to get this document published, the CB has made the decision to leave the document in the order it is. Again, it can be revised sooner than 4/5 years. 3. This has been fixed since the last round of public comment [see 5.8.1.2.12.2.6]		