#	Section (original comment)	Updated section for this comment	Type of Comment (E	Comments	Proposed Resolution	Final Resolutions
		Title		This comment is from WG: Title to be updated so that it is in line with the response to public comments on few other documents.	Standard for Training and Certification of Canine Detection of Explosives	Accept
47	Foreword	Foreword	E	agreement	relieve -> relieves and protocol -> protocols This standard promotes consistency across organizations utilizing canines for the detection of explosives and relieves the judicial system of conflicting protocols.	Accept
57	Foreword	Foreword	E	Change the word "disciplines" to "discipline"	remove the "s" on the word "disciplines" (second paragraph)	Accept
440	All	All	E	use one term i.e., false alert, false positive, or non-productive response.		Accept with modification: The terms "false-alert" and "non-productive response" were selected for use in this document.
441	General	General	E	Suggested changes in this document may have an impact on ANSI/ASB Standard 088, has this been considered?		Reject: This document is meant to be a standalone Standard and the CB will consider comments when revising other documents that this CB has worked on.
17	General	General	E	What is the rule on () vs []? In 4.2.1.6 brackets are used in the e.g., but in 5.8.1.2.19.3.1.2 parentheses are used	editorial check for consistency in the use of brackets vs parentheses	Accept
28	General	General	T	No guideline on use of E-Collar?		Reject: This document is specific to canines working with explosives and "e-collars" potentially may trigger an explosive device being initiated via electronic signals. Detection canines requiring the use of an e-collar may not be appropriate for the detection of explosives and may be more suitable to other detection disciplines.
261	General Comment	General Comment	N	General Comment: This is basically an excellent Standard. However, it makes the major mistake of ignoring the content of the already accepted Terminology (ASB 025) and General Guidelines ASB 088) Standards. Innumerable terms and entire sections of Team Requirements, Training, and Certification are duplicated. Of course there are specific terms and specialized requirements that are fully necessary and unique to this document. For example, 4.1 to 4.1.2 are totally redundant with the General Guidelines, 4.1.3 to 4.2.4 are completely necessary to this Standard.	Rely on Existing Approved Standards and remove entirely redundant sections.	Accept with modification: Several terms were deleted and the reference to TR 025 was added. This standard is meant to be a stand alone document.
262	1. Scope	1. Scope	E	Note well stated (run on sentences): …and canine…field of…including…	…(canine handler and canine). It provides details on follow-on assessments for trained canine teams deployed for explosive detection. This includes traditional…	Reject: The scope follows a similar format to ASB's guidelines for the Scope.
263	3. Terms and Definitions	3. Terms and Definitions	N	Entries 3.1 through 3.15, 3.18, 3.19, 3.21 through 3.27, 3.29 through 3.31, and 3.33 are all included in ASB 025 and should be removed from this document. Only the explosives-relevant terms should be included.	Remove entries 3.1 through 3.15, 3.18, 3.19, 3.21 through 3.27, 3.29 through 3.31, and 3.33	Accept with modification: Several terms were deleted and the reference to TR 025 was added. This standard is meant to be a stand alone document.
264	3. Terms and Definitions	3. Terms and Definitions	N	Several terms are defined throughout the document and should be included in Section 3. These include: odor recognition assessment, operational odor recognition assessment, choke point and choke point operational assessment, line/queue operational assessment, crowd operational assessment	Add Definitions for: odor recognition assessment, operational odor recognition assessment, choke point and choke point operational assessment, line/queue operational assessment, crowd operational assessment	Accept with modification: the terms "operational odor recognition assessment" was added to section 3. The other suggested terms are covered under the definition for "operational assessment".
346	3	3	T	Add new term ("control") and associated definition	Add new term and definition: *control - Non-target stimuli that may be inadvertently associated by the canine as the targeted odor. These may include items such as scent bags, barrier material, storage containers, and gloves.*	Reject: "Control" is not a term used in this standard. The suggested term and definition are synonymous with the term and definition for "distractor".
58	3.2	3.3	E	Add commas, hyphens, and period	add punctuation so that it reads, "certification, recertification, and department-, agency-, or organization-required continuing canine education."	Accept with modification: Punctuation was updated for clarity. This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
402	3.3 and 6.8	3.4 and 6.8	E	3.3 defines canine handler error and 6.8 provided some examples. Can a more inclusive list of examples be provided that are commonly seen in assessments be added? This can remove the assessor's subjective opinion from the evaluations.	create a comprehensive list of examples in an annex.	Reject: The list of possible handler errors is infinite and impossible to give a comprehensive definition on. This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
59	3.4	3.4	T	assessment record is applicable to both training and certification, not just training. See 5.1 and associated note	replace "conducted during training" with "of team performance"	Reject: "Canine assessment record" was replaced with "assessment record" from TR 025 which is a more accurate depiction of this assessment.
60	3.7	3.6	T	I'm not aware of any certifying official who is not also the person signing the certificates. Are you?	Remove the "/or" such that the sentence reads "…evaluation (assessment and/or certification) and sign certificates on…"	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
265	3.8	3.9	E	This is poorly said. The first run-on sentence says the same things repeatedly. The second sentence should be a NOTE.	This definition needs a complete rework. Saying the same thing multiple times is unwarranted. Move second sentence to NOTE:	Accept: This definition is now aligned with TR 025.

#	Section (original comment)	Updated section for this comment	Type of Comment (E or T)	Comments	Proposed Resolution	Final Resolutions
61	3.13	3.15	E	Remove "(non target odor/scent)" from the heading so that it only reads "decoy"	Remove "(non target odor/scent)" from the heading so that it only reads "decoy"	Reject: This definition was deleted from this document. This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
62	3.13	3.15	T	The decoy IS the target person from my understanding of patrol work; so decoy cannot be "non-target odor/scent" in this application. From PSC/PBED work, the decoy can be either HOT [carrying target odor] or COLD [not carrying target odor]. The point is that "decoy" refers to a person used in a particular manner to achieve a training or testing purpose.	Replace "A training term, most commonly associated with patrol work, but the term can be used in other canine training disciplines. A person will perform the role as a decoy." with "A person used in canine training to achieve a specific training objective."	Reject: This definition was deleted from this document. This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
328	3.13	3.15	E	Consider rewording for clarification	A training term, most commonly associated with controlled aggression training of patrol canines and protection sport dogs. The decoy is generally a person who is utilized to assist in training bite work. A decoy, however is utilized to assist in training EDC w/PSC and explosives while integrated with other people to assist in training/assessing person-borne explosive detection capabilities.	Reject: This definition was deleted from this document. This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
335	3.13	3.15	T	Revise the term "decoy" and its definition	Revise term to just be "decoy". Specifically, delete the following text from the term: "(non-target odor/scent)". Also, revise the definition to read: *A term traditionally associated with patrol work (i.e., decoy = the human being pursued and/or in a "bite suit"), but now also includes humans designated to transport/conceal select items in a PSC training or testing scenario.*	Reject: This definition was deleted from this document. This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
336	3.14	3.15	T	Revise definition of "distractor"	Revise definition to read: *Non-target stimuli intentionally placed within a training or testing scenario/search area by the person(s) responsible for placing the training aid in said area. These can include novel items (e.g., candles, candy, hygiene products), food, animal odor, etc.*	Reject with Modification: This definition was edited and updated. (originally 3.14)
1	3.15	3.16	T	The Assessor should always know the location of the target odor for safety reasons, and for the ability to control the search area properly. At no time should it be acceptable for the assessor to not know how to properly manage a search area based on lack of knowledge.	Change the definition for a Double Blind to "neither the Handler nor the Canine knows the location of the Training Aid". Change the definition of a Single Blind to the "Handler knows the location of the Training Aid but the Canine does not."	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon. (originally 3.15)
63	3.15	3.16	T	it's the team being assessed [typically] not just the canine, especially since the canine is always "blind"	Add the word "team" after "canine" in the last sentence so that it reads, "In the evaluation of a canine team…"	Accept: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon. (originally 3.15)
64	3.16	3.17	T	Add "emplaced or static [non-moving]"	Add "emplaced or static [non-moving]" to sentence so that it reads, "…alert to the presence of emplaced or static [non-moving] explosives for which…"	Reject with modification: Definitions 3.17, 3.18 and 3.29 were updated for clarity. This revised definition is appropriate for the purpose of this document.
337	3.16	3.17	T	Revise definition of "explosives detection canine"	Revise definition to read: *A canine trained to detect and alert to the presence of explosives and explosives-related substances (e.g., propellants, oxidizers, precursors) on which it has been trained in select environments.*	Accept with modification: Definitions 3.17, 3.18 and 3.29 were updated for clarity.
390	3.16	3.17	T	Since canines can respond to items or areas where Explosive Materials were located but removed this section should read " …presence of Explosive Odor". Basically saying the material itself is removed BUT the odor can remain for undefined amount of time	Change to text to Comment Area	Reject with modification: Definitions 3.17, 3.18 and 3.29 were updated for clarity. Traditionally EDCs are not trained on residual odor, therefore this revised definition is appropriate for this document.
65	3.17	3.18	E	Add text "on a person" such that the sentence reads, "	Add text "on a person" such that the sentence reads, "… in the environment and/or on a person [person-borne]."	Reject: The revised definition is accurate. Person borne is an accepted technical term in this discipline.
66	3.18	3.19	T	I agree with this definition in principle, but the problem is confirming the absence of odor. The physical target on which the EDCs are trained may not be present at the location/person of the "false alert," but if target odor is present [either through contamination or odor drift], then the EDC's final response is correct and is "false" only from the human perspective. Suggest adding clarification or caveat to this definition to include this possibility. Furton especially should recognize this since he's testified in court before on residual drug odors causing canines to final respond, but a search did not find any physical drugs present. Yet, he doesn't consider this a "false alert" but argues that the dogs are reliable in this instance."	Suggest adding clarification or caveat to this definition to include this possibility.	Reject: This concern is addressed in "Non-productive response" definition in 3.24.
338	3.18	3.19	T	Revise term "false alert"	Revise term to be: "false alert (also referred to as false response or false positive)"	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
395	3.18	3.19	T	Suggest adding or changing to, Non-productive response (NPR) or removing 3.18 because it is mentioned in 3.23 below.	Remove because this is explained in 3.23	Reject: A true false alert may be determinable in training where as it may not be determinable in an operational setting. Non-productive responses correspond to operational settings because the response cannot be confirmed or refuted.

#	Section (original comment)	Updated section for this comment	Type of Comment (E/T)	Comments	Proposed Resolution	Final Resolutions
396	3.18	3.19	T	3.18 as written is not entirely accurate. The canine first displays a behavior consistent with a trained explosive or target odor then he/she will provide a trained final response, in most cases. There may be an occasion when a detector dog will display a behavioral change to a trained explosive or target odor and not final.	Change wording to: Final Response (FR) The canine sits or indicates to the handler that explosives odor is present in the environment or on an individual.	Reject: A true false alert may be determinable in training where as it may not be determinable in an operational setting. Non-productive responses correspond to operational settings because the response cannot be confirmed or refuted.
401	3.18 and 3.23	3.19 and 3.23	E	Confusing; how are they different?		Reject: A true false alert may be determinable in training where as it may not be determinable in an operational setting. Non-productive responses correspond to operational settings because the response cannot be confirmed or refuted.
67	3.19	3.20	T	Is this last sentence necessary? Is there any such thing as an "untrained final response"?	Suggest adding clarification or caveat to this definition to include this possibility if there is such a thing as an "untrained response." If there is not, then delete the last sentence ["Also known as a trained final response."]	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
329	3.19	3.20	T	add to existing paragraph	Explosive detection canines shall exhibit a passive response to the presence of target odor/scent source. Active responses and/or aggression toward target odor/scent source concealments are considered unacceptable and hazardous. (Also, cross reference to 5.5.3 on Page 13)	Reject with modification: A note was added as this information requested by the commenter is explained in section 4.2.1.3.
339	3.19	3.20	T	Revise the term "final response" and its definition	Revise term to be: "final response (also referred to as trained final response, indication, or alert)". Also, remove the last sentence from the definition. Specifically, delete the following text: "Also known as a trained final response."	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
68	3.20	3.21	T	I've never seen this term used in the canine community with whom I've worked. The term I'm familiar with is "initial scan" or "screening search" followed by detailed search. "Hasty" makes it seem like the team was in a hurry and didn't do a proper search, which is not the case.	Change heading to "Initial Scan" or "Screening Search".	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
266	3.2	3.22	E	This is a new term that I believe does not appear elsewhere in the document. The definition seems obvious.	It seems like the value of using this approach should be included in the definition.	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
330	3.2	3.22	T	Add to existing sentence	A quick search "or rapid assessment" of the defined area.	Accept: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
397	3.23	3.22	T	3.23 is not entirely accurate. If a canine respond to confirmed residual odor, that is consistent with trained explosive odors, they are not wrong. When a dog alerts and finals in an operational environment, it is not a false response but rather, it is an "unknown" response because you cannot say for certainty if there was something present that is no longer there.	Change wording for NPR to: The canine responds where no explosives odor is present. Formerly referred to as false response. In PSC it may be called nonproductive Follow.	Reject: a true false alert may be determinable in training where as it may not be determinable in an operational setting. Non-productive responses correspond to operational settings because the response cannot be confirmed or refuted.
69	3.22	3.23	T	I'm not sure if this list was intentional, but all are literally "natural." These things are highly unlikely to be found in a typical EDC/PSC operational environment, but other "operational" distracters may be present such as fuel oil [for ANFO-trained EDCs], mustard/ketchup [for heroin-trained dogs], etc.	Change heading "natural distractors" to "operational distractors" if the intent is to include all non-intentionally placed distractors that may be found in the operational environment. No change is needed if the intent was to list literally "natural" distractors.	Accept: The intent is to list natural distractors.
340	3.22	3.23	T	Natural distractors do not have the same effect as, and thus cannot be a replacement for, true distractors.	Remove this definition from the document and do not include it any elements of the standard. My edits below successfully remove the reference to it under Section 5.8.1.2.15.	Reject: This term is used in this document and it is an appropriate term used in this discipline.
72	3.24	3.23	T	Comment on last sentence on "Scent" - "not necessarily - there are many "human odor" research papers."	Maybe best if a qualifying statement is added that "odor" and "scent" are used interchangeably	Reject: Odor (substance) and scent (humans) are not interchangeable in this document. This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
70	3.23	3.24	T	Add additional text to heading	Heading should read "non-productive response (NPR) or follow (NPF)	Reject: The acronym is not used in this document therefore there is no need to added to the term. This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
71	3.23	3.24	T	false alert was the term previously used	In last sentence, replace the word "positive" with "alert"	Accept: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
341	3.24	3.25	T	Revise definition of "odor"	Revise definition to read: *Particulates or vapors emitted from a substance that are able to be perceived by olfaction. "Odor" has traditionally referred to canine detection of a substance, and "scent" has traditionally referred to canine detection of humans, but these terms are used interchangeably.*	Reject: Odor (substance) and scent (humans) are not interchangeable in this document. This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
398	3.25	3.25	T	3.25 Suggest adding the word test	Odor Recognition Test	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.

#	Section (original comment)	Updated section for this comment	Type of Comment (E	Comments	Proposed Resolution	Final Resolutions
73	3.25	3.25	T	should add ORT as the term is most familiar to the canine operator community	add "test [ORT]" so that the heading reads "odor recognition test [ORT] assessment"	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
74	3.25	3.25	T	I feel this is needed since ORT is typically about odor recognition, not operational capability. So odors must be readily available so the test if of recognition and not of threshold.	add text "minimally concealed" such that the sentence reads, "… alert to minimally concealed target odor(s) …"	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
342	3.25	3.26	T	Revise definition of "odor recognition assessment" and simultaneously improve consistency with text in Section 5.8.1.1.8.2.	Revise definition to read: *A test of a canine's ability to alert to target(s), and often to additionally not respond to non-targets, where said items are presented/placed in a manner such that their odors are readily available.*	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
343	3.26	3.27	T	Revise definition of "operational assessment"	Revise definition to read: *A test of a canine's ability to alert to target(s), and often to additionally not respond to non-targets, where said items are placed in an operational environment with varying degrees of perceived difficulty/odor availability.*	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
75	3.27	3.28	T	proficiency is a measure of capability, not a training task - incorrectly defined as written This is the definition of maintenance or operational training, not operational "proficiency".	change "operational proficiency" to "maintenance training" or "operational maintenance training" "operational proficiency" should be defined as "a measure of the team's capability to perform the required operational tasks"	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
76	3.28	3.28	T	need to add terminology in use by the operational canine community	Add section called "Person-Borne Explosive Detection Canine PBEDC" Should reference PSC definition and vice versa	Reject: This standard is using a multi-agency reviewed and accepted lexicon for the term. Since there are numerous variations of the term, a singular, no agency specific term was selected.
77	3.28	3.30	T	Change heading. The change is needed to keep terminology consistent with TSA, the agency with the largest number of operational PSC teams	Replace "person screening canine" with "person search or passenger screening canine"	Reject: This standard is using a multi-agency reviewed and accepted lexicon for the term. Since there are numerous variations of the term, a singular, no agency specific term was selected.
78	3.28	3.30	E	by definition, PSC is detecting explosives on a person - so there is no "may be" about it	Replace "may be" with "is".	Reject: the definition is accurate as is.
79	3.28	3.30	T	Comment on second sentence - A PSC is first trained as EDC and must pass EDC certification prior to [IPWDA] or at same time as [TSA] being assessed and certified on PSC portion. If the PSC team is not EDC certified, then they cannot legitimately perform a traditional search. Any results from such search would likely face legal challenge.	Delete the second sentence: "The canine team is not EDC certified, however, the canine team may be responsible for searching its intended operational area and/or person(s) separated from their personal property."	Reject: The suggested modification is only accurate for EDC w/PSC capability. The definition is accurate for the purpose of this document.
391	3.28	3.30	T	PSC teams also known as PB-IED teams can also be EDC trained/certified. If these teams are trained properly it shouldn't matter which discipline they have as the explosive odor should be the stimulus to their alerts.	Change to text to Comment Area	Reject: The suggested modification is only accurate for EDC w/PSC capability. The definition is accurate for the purpose of this document.
399	3.28	3.30	E	In this context, is the PSC a single discipline? How is it that a PSC is not EDC certified? If its not certified how is it operating in an operational environment that it has not been tested.	Single discipline PSC: The canine team is not EDC certified. Duel discipline PSC: The canine team is EDC certified and may be responsible for searching its intended operational area and/or person(s) separated from their personal property.	Reject: The suggested modification is only accurate for EDC w/PSC capability. The definition is accurate for the purpose of this document.
80	3.29	3.31	T	this definition does nothing to explain what an "alert" is - even the canine trainers and handlers differentiate between the different stages of a canine response [interest, alert, response] - "alert" is the change of behavior [COB] associated with target odor/scent	Change definition to: The correct change of behavior associated with or in the presence of target odor/scent.	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
344	3.29	3.31	T	Revise definition of "positive alert"	Revise definition to read: *A final response in the presence of the target odor.*	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
82	3.32	3.33	T	Add "detection" to heading This is necessary to distinguish it from "identification taggants," which are meant for post-blast forensics, source tracing.	Add the word "detection" to the heading so that it reads, "detection taggant"	Accept
83	3.32	3.33	T	In reference to "(e.g. nitro compounds)" Either list them or leave off this statement since all four taggants are nitro compounds. So it's not a matter of "for example" as "e.g." would suggest that chemical taggants other than the nitro compounds exist.	Delete the text "(e.g. nitro compounds)"	Accept with Modification: This definition was edited and updated and the example was removed.
84	3.32	3.33	T	In reference to "rapidly" I wouldn't define something that will take many years to deplete as "rapidly" vaporizing. Taggants vaporize more readily than the parent explosives but are still orders of magnitude slower to evaporate than cyclohexanone, for example.	Delete the word "rapidly" and replace with "more readily than"	Accept with Modification: This definition was edited and updated.

#	Section (original comment)	Updated section for this comment	Type of Comment (E	Comments	Proposed Resolution	Final Resolutions
85	3.32	3.33	T	In reference to "instrumental analysis" This includes both instruments and dogs - instrument analysis isn't correct because an X-ray machine is an instruments and it can't tell the difference between tagged and untagged explosives.	Replace "instrumental analysis" with "vapor detectors"	Accept with Modification: This definition was edited and updated.
81	3.31	3.34	T	add text to definition	add "or testing" such that sentence reads, "Target odor/scent sources used for training or testing."	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
345	3.31	3.34	T	Revise definition of "training aid"	Revise definition to read: *A sample of a material/contraband used to produce the targeted odor in detection canine training and testing scenarios.*	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
400	3.31	3.34	T	3.31 Suggest changing the definition title	Canine Explosive Training Aid (CETA).	Reject: This standard is using a multi-agency reviewed and accepted lexicon for the term. Since there are numerous variations of the term, a singular, no agency specific term was selected.
86	3.33	3.34	T	I don't understand the intended meaning. Is this meant to describe situations where there was no follow-up search subsequent to a canine response, or a search that did not find any explosives? I think the definition is referring to the latter situation, but that is not "lack of verification of search result." The search turned up nothing, but that doesn't mean the search wasn't "verified." Even if instruments were available to "verify" a canine response, the instrument may be detecting something different than what canines are detecting [e.g., using ETDs to resolve PSC response] or the instruments don't have the detection limits of the canines.	here is an alternative definition of "unconfirmed operational outcome" that is more accurate, depending on the intended meaning: "a positive indication by a canine following a search but no explosives were found or detected by other means"	Reject: This comment will be provided to TR 025 WG to be considered when this TR is revised sometime soon.
347	4.1	4.1 (4.1.5)	E	Improve organization and streamline section by incorporating bullet 4.1.6 into list in 4.1.2	Delete bullet 4.1.6 and simply add "search techniques" as a new entry to the list of topics to be instructed in Section 4.1.2.	Reject: 4.1.6 is of significant importance that requires its own section.
14	4.1.1	4.1.1	E	organization should be user instead of entity	swap organization for entity	Accept
2	4.1.2	4.1.2	T	Add the following courses for the Handler Training to the curriculum. 1) Bathing and Grooming; 2) Food Preparation and Supplements; 3) Goal Oriented Placement of Training Aids; 4) Public Demonstrations and Relations; 5) Canine Equipment (Selection and Maintenance); 6) Importance of Canine Record Keeping.	Add these courses to the Handler Training Requirement.	Reject: The competent trainer designs the training plan specific to organization's needs. Also, ASB is in the process of finalizing a document that specifically addresses canine care.
38	4.1.2	4.1.2		There is training for the handler on explosives and the safe handling of explosives, but not IEDs. At a minimum, there are two animals participating in a sweep; the dog and the handler. While the handler's ability to detect explosive scent is much more inferior to the dog, some handlers have more intelligence than the dog and can use their vision and knowledge to detect threats.		Reject: The competent trainer designs the training plan specific to organization's needs. Explosives safety is covered in section 4.1.2 -a.
87	4.1.2	4.1.2	E	Insert word "be"	Insert word "be" such that the first sentence reads, "…include, but not be limited to…"	Accept
348	4.1.2	4.1.2	T	Add new requirement/emphasis regarding the integrity of training aids (i.e., avoiding their contamination)	Add new bullet: *education on training aid integrity to include storage, transportation, and handling.*	Reject: Please refer to section 8, Training Aid Storage and Handling.
88	4.1.2 b	4.1.2 b	T	COB should be included in definitions and to stay consistent with the operational canine community should be defined as "change of behavior associated with trained odor"	No changes to text in 4.1.2 Add "Change of Behavior [COB]" to definitions Definition should be "change of behavior associated with trained odor"	Accept with modification: COB definition has been added to section 3.
89	4.1.2 b	4.1.2 b	E	In reference to "particular stimuli" It's either "particular stimulus" [singular] or "stimuli" [plural without "particular"]	Replace "particular stimuli" with "a particular stimulus"	Reject: This statement is correct as used.
267	4.1.2 b)	4.1.2 b)	E	The order of ideas is wrong for definition in a Standard.	Switch order to …ability to interpret the …stimuli). Often referred to as "read the canine."	Reject: This statement is already included in the published Std 088. "Recognizing" replaced "interpreting" for clarification in sections 4.1.2-b and throughout section 5 and section 6.
392	4.1.2 (b)	4.1.2 (b)	T	…. Ability to "read their canine" and differentiate between when the canine is Investigative sniffing or whose change of behaviors is due to the detection of an odor of a explosive material being present.	Change to text to Comment Area	Reject: The competent trainer designs the training plan specific to organization's needs. This comment would be addressed in the Organization's training plan.
		4.1.2-b		WG-Edit	To align with Std 024, 026 and -27 replace "interpreting" with "recognize"	Accept
90	4.1.2 j	4.1.2 j	T	This is a nice to have but should not be a requirement, other than maybe the odor/scent dispersion bullet. Handlers for private companies that train or provide search canines service have no need to know case law to perform their work.	Move list to be recommended, but not required training.	Reject: This is a requirement for all canine handlers, including private companies.
		4.1.2-g		WG-Edit	To align with Std 024, 026 and -27 delete "aspects of"	Accept

#	Section (original comment)	Updated section for this comment	Type of Comment	Comments	Proposed Resolution	Final Resolutions
91	4.1.3	4.1.3	T	I don't understand the distinction here - all PSCs are also EDCs but not all EDCs are PSCs. So I don't understand why "PSC handler" needs to be delineated from "EDC w/PSC."	Recommend using only "PSC" here and throughout and not use "EDC w/PSC"	Reject: There are three distinct categories of explosive detection canines that require specific and different training appropriate to their category.
92	4.1.3 b	4.1.3 b	T	In reference to "proper downwind" This is a bad recommendation since it doesn't account for chaotic airflow, where odor could be in front or behind a person.	Delete "downwind" and change definition as recommended below in 4.1.3 b	Accept with modification: This section 4.1.3-b was edited and clarified.
93	4.1.3 b	4.1.3 b	T	improve definition	Replace "technique" with "techniques that maximize the chances for the PSC to encounter odor."	Accept with modification: This section 4.1.3-b was edited and clarified.
268	4.1.4	4.1.4	E	..organizational certification… could be better said	Change to …certification requirements of the organization.	Reject: 4.1.4 was moved and it is now 4.3.4. This statement is accurate as is.
403	4.1.4	4.1.4	E	this should be the opening paragraph of 4.1	The canine handler training shall be conducted by a competent canine trainer from an entity that utilizes a structured curriculum with specific training and learning objectives. The training shall be structured to meet the typical mission requirements of the canine team's department, agency, or organization, herein referred to as organization. The canine team's training shall continue to maintain a level of operational proficiency and obtain and maintain organizational certification requirements (see Sections 5, 6, and 7).	Reject: Reject: 4.1.4 was moved and it is now 4.3.4. These statements are significant and must remain as separate requirements.
94	4.1.5	4.1.5 (4.1.4)	E	add comma	Add a comma after the word "storing"	Accept
95	4.1.6	4.1.6 (4.1.5)	T	This is a very strange, out-of-place statement. Search technique is going to be taught, regardless of the reasons why.	Maybe it's enough to switch the two segments to read - "Canine handler training shall include search techniques to maximize search efficiency."	Reject: This statement is accurate as is.
394	4.2	4.2	T	Initial Training of the Canine	I did not see a section that is dedicated to the container type being used to house the explosives during training. It is recommended that a section be added stating that multiple container types(glass, plastic, etc.) be utilized during the training of the canine as to not inadvertently make the container of the explosives the stimulus for the canines final responses	Reject: Please refer to section 8, Training Aid Storage and Handling. There are numerous different training aid containers that can be selected. A qualified trainer will be able to assist with the appropriate selection of and proper use of the containers as distractors.
15	4.2.1	4.2.1	E	organization should be user instead of entity	swap organization for entity	Accept
96	4.2.1	4.2.1	T	in regards to "EDC w/PSC" Again, I don't understand the distinction between EDC w/PSC vs PSC. See above comment (4.1.3).	Delete text "EDC w/ PSC,"	Reject: There are three distinct categories of explosive detection canines that require specific and different training appropriate to their category.
97	4.2.1	4.2.1	E	-	Replace the period at the end of the last sentence with a colon. "…to the following :"	Reject: This list follows ASB's style.
404	4.2.1.1 and 2	4.2.1.1 and 2	T	Not all agencies conduct training or operational searches off lead. Training for off lead controls, direction, training or operational should not be included in this section. Suggest removing off lead controls as part of section 4.2.1.1 and 4.2.1.2	Suggest removing off lead controls as part of section 4.2.1.1 and 4.2.1.2	Reject: The statement is an "and/or" so that the organization can decide on its own.
269	4.2.1.1 and 4.2.1.2	4.2.1.1 and 4.2.1.2	E	It is unclear that these two elements have any difference. If "obedience training" and "control training" are different, add to Terms.	Delete either 4.2.1.1 or 4.2.1.2 or clarify	Accept: "Control Training" was added in section 3.
98	4.2.1.2	4.2.1.2	T	As written, it is not clear what is the difference between obedience and control training.	Need to expand or define "control training."	Accept: "Control Training" was added in section 3.
		4.2.1.4		WG-Edit	To align with Std 024, 026 and -27 delete "team"	Accept
99	4.2.1.5	4.2.1.5.1	T	In reference to "mandatory explosives" The list as written implies that TNT, PETN, and RDX are mandatory explosives, but the Annex shows examples of explosives containing these mandatory explosives. So each one on the list needs to be changed as noted below [-based explosive].	see next comments	Reject: The reference to mandatory explosives is appropriate as is, because a mandatory item can become an optional item based on the organization's needs/mission.
270	4.2.1.5	4.2.1.5.1	E	Correctly termed 'double-base'	Add a dash	Accept
406	4.2.1.5	4.2.1.5.1	T	The list of explosives in 4.2.1.5 and Annex A may not apply to all agencies.	Suggest adding wording stating that programs may add or delete explosives as missions dictate and to meet emerging threats.	Reject with modification: See updated section 4.2.1.6 that includes additional clarification. Section 4.2.1.5 is a baseline for the detection canine.
349	4.2.1.5 & 4.2.1.6	4.2.1.5.1 & 4.2.1.5.2	T	Make single base smokeless powder a mandatory material, and double base smokeless powder an additional/optional material.	Move single base smokeless powder to 4.2.1.5.1 and move double base smokeless powder to 4.2.1.6.	Reject: Double-based smokeless powder is more prevalent.
350	4.2.1.5 & 4.2.1.6	4.2.1.5.1 & 4.2.1.5.2	T	Make ammonium nitrate a mandatory material.	Move ammonium nitrate to 4.2.1.5 (and remove it from 4.2.1.6).	Accept with modification: One type of ammonium nitrate remains in 4.2.1.6 as based on historical use.
331	4.2.1.5/6.5.2 d/6.5.3 a	4.2.1.5.1/6.5.2 d/6.5.3 a	T	Consider switching	Replacing dynamite (subsection d) with ammonium nitrate (AN) from 4.1.1.6 on Page 11. Consider moving dynamite to the mission or specific treat list under 4.2.1.6. Justification for the past decade, AN is used more often in IEDs than dynamite. Dynamite is not manufactured domestically.	Accept with modification: One type of ammonium nitrate remains in 4.2.1.6 as based on historical use.

#	Section (original comment)	Updated section for this comment	Type of Comment (TE)	Comments	Proposed Resolution	Final Resolutions
100	4.2.1.5 a	4.2.1.5.1 a	T	-	Add "-based explosive" to the end of the explosive name so that it reads, "2,4,6-trinitrotoluene (TNT)-based explosive"	Accept with modification: The word "explosive is not added.
101	4.2.1.5 d	4.2.1.5.1 d	T	-	Add "-" to the end of the explosive name so that it reads, "…dinitrate (EGDN)-based"	Accept with modification: the proposed resolution was accepted, however as a result of the comments 350 (excel line108) and 331 (excel line 109) this item was moved to section 4.2.1.5.2.
102	4.2.1.5 e	4.2.1.5.1 e	T	-	Add "-based explosive" to the end of the explosive name so that it reads, "…tetranitrate {PETN}-based explosive"	Accept with modification: The word "explosive is not added.
103	4.2.1.5 f	4.2.1.5.1 f	T	-	Add "-based explosive" to the end of the explosive name so that it reads, "……triazacyclohexane-based explosive"	Accept with modification: The word "explosive is not added.
39	4.2.1.6	4.2.5.2		Why would ammonium nitrate be optional? Based upon the use of explosives, the purpose of canine sweeps, and the likely threats that we face today; ammonium nitrate is probably of greatest concern. Of the large vehicle bombings in the US, two we ammonium nitrate based 09/16/1920 – Wall Street, Carriage 100 pounds of dynamite 08/24/1970 – University of Wisconsin. Van, 2000 pounds of ANFO (homemade) 02/26/1993 – World Trade Center, Van 1336 pounds of Urea Nitrate (homemade) 04/19/1995 – Murrah Federal Building, Truck 4800 pounds of ANFO (homemade) And improvised explosives are basically any non-commercial explosives (like the ANFO and UNi mentioned above). Also, it seems a bit odd that plastic explosives are optional.		Accept with modification: Ammonium nitrate was moved to the mandatory list. Plastic explosives may be the source of the mandatory RDX-based explosive.
50	4.2.1.6	4.2.5.2	E	While improvised explosives is a historically accurate term, homemade explosive (HME) is the terminology currently in use by the DOJ and IABTI - consider including HME as this is the term that will be familiar to users of the document (commented here because the term was first use here, but comment applies throughout)	Replace IE with HME or use both	Reject: The community is returning to the use of IE, aligned to the C-IED lexicon and is currently being used in policy documents.
104	4.2.1.6 a	4.2.1.5.2 a	T	in regards to "emuline" This is a registered trademark name for an emulsion composition. So why call out a specific product when emulsion is already included above?	delete "emuline"	Accept
105	4.2.1.6 b	4.2.1.5.2 b	T	From a safety perspective, it seems to me that black powder substitutes make for a better mandatory odor than black powder itself.	Recommend making mandatory list to include "black powder or black powder substitutes" and not include the black powder substitute under optional	Reject: Black powder has historic and current prevalence and safety is paramount in handling of all explosives.
106	4.2.1.6 d	4.2.1.5.2 d	T	Why is this now in the optional list? Annex A, Table A.1 lists Cast Booster as an example satisfying the TNT mandatory requirement.	Remove Cast Booster as optional since it is already listed under TNT as required	Reject: Cast boosters were removed as a source of mandatory TNT and/or PETN. Based on mission requirements, cast boosters may still be an important training aid and that is why they are still included in the optional list.
107	4.2.1.6 e	4.2.1.5.2 f	E	addition of "-"	add "-"s such that sentence reads, "… [e.g., chlorate-based mixtures, nitrate-based mixtures, perchlorate-based …"	Accept
108	4.2.1.6 e	4.2.1.5.2 f	T	What about hydrogen peroxide [HP]?	add "concentrated hydrogen peroxide (CHP)"	Reject: It is not best practice to train canines on odors associated with common household items. This will lead to nuisance (false) alarms.
109	4.2.1.6 e	4.2.1.5.2 f	E	addition of "-"	add "-" after the word "peroxide" so that it reads "peroxide-based explosives…"	Accept
271	4.2.1.6 e)	4.2.1.5.2 f	T	More examples of peroxide-based explosives should be added	…(TATP), Hydrogen Peroxide/Fuel Mixtures, Urea hydrogen peroxide]	Reject: It is not best practice to train canines on odors associated with common household items. This will lead to nuisance (false) alarms. HPOM mixtures are known to be chemically unstable and unpredictable.
110	4.2.1.6 g	4.2.1.5.2 h	T	Why is this now listed as optional? Examples of plastic explosives are given for PETN and RDX in the mandatory explosive list in Annex A, Table A.1.	Plastic explosives are already listed under mandatory and should not, therefore be listed under optional	Reject: If plastic explosive were not selected as the mandatory source of RDX and/or PETN. Based on mission requirements, plastic explosives may still be an important training aid and that is why they are still included in the optional list.
272	4.2.1.6 i)	4.2.1.5.2 j	T	I don't believe nitromethane alone is an explosive, it combusts with air rapidly and is an explosive when mixed with hydrogen peroxide	How about …nitromethane (NM) mixtures;	Reject: Nitromethane (NM) is a high explosive capable of detonating.
273	4.2.1.6 NOTE	4.2.1.6 NOTE	T	The last paragraph should be a NOTE: Also, I'm not sure handlers understand the implications of what 'instability' implies.	Change to …extreme handling requirements of…	Reject with modification: "sensitivity and/or chemical" was added to the first sentence. It can not be a note because this statement is a requirement (it incudes a "shall").
48	footnote on taggants	footnote on taggants	E	consider including that the agreement was amended in 2002 and o-MNT was deleted from this list	add a parenthetical after o-MNT (deleted from the list of detection agents in a March 2002 amendment)	Accept
111	pg. 11 footnote b	pg. 11 footnote b	T	It seems more appropriate to cite the international agreement since this citation implies that plastic explosives manufactured in another country would not contain taggants.	Cite international agreement	Accept

#	Section (original comment)	Updated section for this comment	Type of Comment (E	Comments	Proposed Resolution	Final Resolutions
112	pg. 11 footnote b	pg. 11 footnote b	T	In regard to the word "rapidly"	see discussion and changes in 3.32 [p.9] on problems with this statement	Reject with modification: The footnote was edited to match the International Civil Aviation Organization guidelines.
113	pg. 12 footnote b	pg. 12 footnote b	T	In regards to sentence starting "Due to the extreme instability…" Does not apply if the TA has been made and proven to be "non-detonable." Also, reference to "chemist" is overly broad - not all chemists qualify to handle IEs.	Add "neat" in front of "peroxide-based explosives compounds" [should read "neat peroxide-based explosive compounds"] Also add statement that this requirement does not apply if the training aid has been manufactured to be non-detonable or non-hazardous.	Reject: Clarification was added in section 4.2.1.5, 5.7, and 6.5.2 that actual explosives and targeted oxidizers shall be used for imprinting and certification. Non-detonable or non-hazardous type materials mimicking actual IE shall not be used for initial training. Therefore the statement is accurate.
274	4.2.1.7	4.2.1.6	E	"Tagged' is undefined, taggant is.	Change to …training incorporate taggants.	Accept with modification: "contain taggants" was added to this section.
26	4.2.1.7	4.2.1.6 (4.2.9)	E	Use of "IE" I assume mean improvised explosives-did not see definition	Change to "HME"-Homemade Explosives, common term used by Bomb Techs	Reject: The community is returning to the use of IE, aligned to the C-IED lexicon and is currently being used in policy documents.
40	4.2.1.8	4.2.1.7		Do they need to explain or specify the varying concentration/amounts of available odor. This is especially key. As we have seen empirically, dogs can have difficulty with large quantities of odor…and typically our priority is to be able to detect/stop the big bombs first (like the 1000 pound plus bombs above). Even relatively small bombs (like a 20 pound suicide device) are much larger than typical training scenarios. My SABT shared an interesting article about dogs detecting mixtures that alludes to the concentration of explosives problem (Canine's Ability to Detect Explosive Mixtures Depends on Their Training, Texas Tech Today by George Watson, January 8, 2019, https://today.ttu.edu/posts/2019/01/Stories/explosive-sniffing-dogs-training)		Reject: The scientific usage of concentration is appropriate. While the concentration may be unknown, it can be manipulated.
275	4.2.1.8	4.2.1.7	T	The term concentration implies you know the concentration of odors, which you don't.	The word 'amounts' says all that is known. Change to …varying amounts of…	Reject: The scientific usage of concentration is appropriate. While the concentration may be unknown, it can be manipulated.
49	4.2.1.9	4.2.1.8	T	Unclear what the origin of this requirement is - the only reference in this document that I saw on the topic was #20 that showed there were no issues with the canines responding to the precursor chemicals. Are there studies that indicate the detection of precursors to be an issue? If the statement stays then it should be clarified. Non-explosive precursors in the synthesis of HMEs include strong acids which would not be recommend for routine exposure. Additionally things that are precursors in some synthesis paths represent explosive hazards in other contexts - eg. hydrogen peroxide is a precursor to organic peroxides such as TATP, but can but used in an oxidizer/fuel mixture as the oxidizer. Proofing the canine off of hydrogen peroxide would be counterproductive. Additional example - one synthesis method for ETN involves the used of AN	Remove statement. If keeping make it a should instead of shall and be specific about the odors they should be trained off of to be clear it does not apply to all precursors - possibly worth spelling out specifically which odors are viewed as problematic? maybe an additional table?	Accept: Statement was removed.
114	4.2.1.9	4.2.1.9	T		Remove the word "trained" so that the sentence reads "…to manufacture the IEs…"	Reject: Statement was removed.
276	4.2.1.9	4.2.1.9	E	Additional sentence should be a NOTE:	Add word NOTE:	Reject: Statement was removed.
351	4.2.1.9	4.2.1.9	T	Correct the misrepresentation of concomitant ingredients like sugar as a "distractor".	Add the term "control" to the list of definitions (#12 above) and change the end of 4.2.1.9 to "…shall be used as controls." (i.e., swap "control" for "distractor")	Reject: The term used throughout the document is "distractors" not "control". The second paragraph was removed.
115	4.2.1.10	4.2.1.10	T	I'm not sure what the word "controlled" is supposed to mean. Off-leash canines, such as those two from Orange County Sheriff's Dept, search independently and mostly randomly, which could be interpreted as "uncontrolled." But they are effective. So what does a "controlled search" mean, and why is it required?	Change "safe, effective, and controlled search" to "safe and effective search"	Reject with modification: A canine should perform a controlled search (systematic and on-task) on or off-lead. This statement was moved to section 4.3 as a result of comment 405 (excel line 140).
277	4.2.1.12	4.2.1.12	E	Certified' is not defined. Certification is.	Change to …team has achieved certification.	Reject with modification: This section is accurate as is. This statement was moved to section 4.3 as a result of comment 405 (excel line 140).
405	4.2.1.12	4.2.1.12	E	Paragraph speaks to the canine team's initial training; should focus on the canine in this section.	The canine's initial training shall be continued until the required level of proficiency is achieved and the canine meets all training protocols and objectives.	Accept with modification: Section 4.3 was added to consolidate the canine team initial training. This statement was moved to section 4.3 as a result of this comment.
116	4.2.2	4.2.2	E	Add "-"	Remove the word "Additional" and add "-" so that the sentence reads, "EDC-specific training shall…"	Reject: "Additional" is appropriate as it adds to the already inclusive list. Acronym for this term "EDC" does not require a hyphen prior to the word "specific".
117	4.2.2	4.2.2	T	Why "additional"?		Reject: "Additional" is appropriate as it adds to the already inclusive list.
118	4.2.3	4.2.3	E	Add "-" Add "be" Replace "." with ":"	Make these three changes so that it reads, ""Additional PSC-specific training shall include, but not be limited to, the following:"	Reject: Acronym for this term "PSC" does not require a hyphen prior to the word "specific". "Including, but not limited to"… was updated.

#	Section (original comment)	Updated section for this comment	Type of Comment (E	Comments	Proposed Resolution	Final Resolutions
119	4.2.3	4.2.3	E	placement(s) is plural, not aid	change "training aid(s) placement" to "training aid placements"	Accept
278	4.2.3	4.2.3	E	Additional sentence should be a NOTE:	Add word NOTE:	Reject: This list follows ASB's style. This sentence cannot be a note, because it contains a requirement.
279	4.2.3	4.2.3	E	Sub-elements do not follow logically	Reword: …to include the following decoys:	Reject with modification: sub elements in the list included in 4.2.3 were clarified by adding the words "target person".
120	4.2.3 a	4.2.3 a	E	Add "-"	Add "-" after the word "computer" so that it reads, "…computer-type bag…"	Accept
121	4.2.3 b	4.2.3 b	E	Add a comma	Add a comma after the word "hat"	Accept
122	4.2.3 c	4.2.3 c	E	Add commas	Add commas after the words "catering cart" and "pushed"	Accept
123	4.2.3 d	4.2.3 d	T	Isn't this an EDC search and not PSC-specific?	delete line d)	Reject: The PSC should be capable of identifying an explosive in their operational environment.
124	4.2.4	4.2.4	T	Once again, I don't understand the distinction between EDC w/PSC and PSC. See previous comments on same subject.	Recommend using only "PSC" here and throughout and not use "EDC w/PSC"	Reject: There are three distinct categories of explosive detection canines that require specific and different training appropriate to their category.
125	5.1	5.1	T	See note on 3.4 assessment record This statement validates the comment made.		Reject: "Canine assessment record" was replaced with "assessment record" from TR 025 which is a more accurate depiction of this assessment.
126	5.5	5.5	E	replace "." with ":"	replace "." with ":" so that it reads, "… the following:"	Reject: This section follows ASB's style.
21	5.5.1	5.5.1	E	Use of the term detonating devices	Replaced with term detonators coincide with more common terminology used by Bomb Techs	Accept
127	5.5.2	5.5.2	T/E	This needs to be "shall" more than any other "shall" statements made thus far. Under what circumstances is it acceptable to emplace explosives in a manner that the EDC can retrieve it?	replace "should" with "shall"	Reject: There are training scenarios in which a visual stimulus is required to train, or correct retrieving/touching the training aid.
128	5.5.2	5.5.2	E	insert "that"	insert "that" so that it reads, "… a manner so that the canine…"	Reject: The word "that" is grammatically not required.
29	5.5.3	5.5.3		Aggression on target odor during assessment requires an immediate remediation action. If a canine is corrected during an assessment, the canine may shut down or may take it as not to respond on the target odor.	Aggression during assessment should be noted but not corrected during certification. Correction is for remedial training after assessment not during.	Reject: The remediation action corresponds to both stopping the behavior and reinforcing canine's final response which should include follow up remedial training. If the canine exhibits this behavior the assessment should not continue until the remediation is completed.
129	5.5.3	5.5.3	T	Pretty much all teams I've observed would require "remediation." I don't understand why "bark" would be considered "aggression."	Delete "bark" from the list	Reject: This document is specific to canines working with explosives and "bark" is an indication of non-traditional aggression and potentially may trigger an explosive device being initiated via sound.
407	5.5.3	5.5.3	E	Bark is considered a response not necessary an aggressive behavior.	delete "bark"	Reject: This document is specific to canines working with explosives and "bark" is an indication of non-traditional aggression and potentially may trigger an explosive device being initiated via sound.
130	5.6	5.6	E	replace "." with ":"	replace "." with ":" so that it reads, "… the following:"	Reject: This section follows ASB's style.
131	5.6.1	5.6.1	E	replace "as" with "that"	replace "as" with "that"	Reject: The word "that" is grammatically not required.
332	5.6.1	5.6.1	E	rewording for clarification	Placement of target odor on all decoys shall be don to avoid any direct skin contact with the decoy.	Reject with Modification: See revised section 5.6.1.
408	5.6.1	5.6.1	E	All target odors shall be placed such as direct skin contact is avoided.	All target odors shall be placed in a manner to avoid direct skin contact.	Accept
132	5.6.2	5.6.2	T	not necessary - depends on the vapor pressure of the explosive in use - NG is the only one with sufficient vapor pressure to have potential for causing health effects, but even then, we've not seen any issues with on-body hides such as waist-front. Tetryl and PETN have too low vapor pressure to have a vasodilation effect.	Recommend changing sentence to read: "Care shall be taken to minimize a target person's exposure to known vasodilators (e.g., NG, PETN)."	Reject with modification: section 5.6.2 was edited for clarity.
41	5.6.3	5.6.3		Instead of saying that Peroxide based and ETN explosives shall not be placed on the target person for safety, I would say that Primary explosives, like some peroxide-based explosives, and ETN based explosives shall not be placed on the target person for safety. Based upon the description of explosives in the earlier section, there is potential to train with other extremely dangerous explosives like flash powder, lead azide, etc.		Accept with Modification: section 5.6.3 was edited for clarity.
133	5.6.3	5.6.3	T	A blanket statement like this cannot be made since there are proven, non-explosive formulations [at least for TATP and HMTD] that allow on-body placement without any safety issues.	Change "peroxide based and ETN" to "neat peroxide-based and neat ETN" Add statement indicating that validated non-detonable training aids for these explosives may be used on-body.	Reject: Clarification was added in section 4.2.1.5 and 6.5.2 that actual explosives shall be used for imprinting and certification. Clarification was added to section 7.1 note for the acceptable uses for non-detonable or non-hazardous training.
22	5.7.1	5.7.1	T	No max amount of explosive	Determine max limit (physical weight)	Reject with modification: There is not maximum weight for the majority of the assessment. Maximum weight is determined based on availability of explosive substance. Section 5.7.1.1.3 was added for clarification in the non-operational odor recognition assessment that does include a maximum weight.
51	5.7.1	5.7.1	t	1/4 pound is high for the odor recognition certifications. At some point configuration matters more than quantity. Consider making a minimum amount of material OR a minimum exposed surface area.	The minimum amount of target odor used for all assessments shall be 1/4 lb OR sufficient material to ensure X square inches of surface area are exposed	Reject with modification: There is not maximum weight for the majority of the assessment. Maximum weight is determined based on availability of explosive substance. Section 5.7.1.1.3 was added for clarification in the non-operational odor recognition assessment that does include a maximum weight.
280	5.7.1	5.7.1	T	All ASB/ANSI must use S.I. units, your international partners will not understand pounds, feet.	Change to …0.11 Kg (1/4 lb.). Or it could be simply 0.1 Kg (1/4 lb.).	Accept

#	Section (original comment)	Updated section for this comment	Type of Comment	Comments	Proposed Resolution	Final Resolutions
52	5.7.1.1	5.7.1.1	t	consider making an exception for nitromethane		Accept: See added section 5.7.1.1.4 and 6.5.1.4 "Nitromethane should not exceed 1/2 milliliter."
409	5.7.1.1.1	5.7.1.1.1	T	5.7.1.1.1: Not all programs use the same explosives, weights and lengths of substances in training, assessments/evaluations. This is too vague and places unreasonable cost and expectations on programs across the board.	Suggest adding wording that programs can add or use less explosives, weights and lengths of substances to meet agency and program requirements.	Reject: These are the minimum requirements for assessment which comprise of certification. There are flexibilities built in with the exception of additional flexibility in weight variation for training scenarios is referenced in section 7.
42	5.7.1.1.1	5.7.1.1.1		There are lots of issues with detonating cord. First, there are different explosives fillers; I have seen PETN and RDX based detcords and I am sure there are more. Second, there has been some work done showing that dogs trained on PETN detcord can detect PETN based detcord, a considerable percentage cannot detect PETN alone. This is an issue since non-detcord based PETN has been seen more and more frequently in bombings and bombing attempts.		Accept with modification: Detonation cord was removed as a source of the mandatory RDX and PETN. The exception to the minimum weight is still necessary, as detonation cord is commonly used in training and certification.
53	5.7.1.1.1	5.7.1.1.1	t	Consider changing the det cord requirements to be based on the surface area of the cut ends rather than that total length of cord. If the det cord has a heavy plastic wrapper increasing the length of det cord will not be as effective at increaseing the target odor availability as increasing the number of cut ends		Accept with modification: Detonation cord was removed as a source of the mandatory RDX and PETN. The exception to the minimum weight is still necessary, as detonation cord is commonly used in training and certification. The working group acknowledges that the surface area is a factor, however, a quantifiable amount is necessary.
134	5.7.1.1.1	5.7.1.1.1	T	See discussion in Table B.1 briefly summarized here: - how was 8' x 50gr/ft decided as the appropriate amount for use in assessment - this is equivalent to 25.9 grams = 0.9 oz] net explosive content	Need to add explanation on how it was determined that this was the appropriate quantity to use	Accept: Explanation added to Annex B.
281	5.7.1.1.1	5.7.1.1.1	T	S.I units required	Change to ... 0.3 m (1 ft.)	Accept with modification: Following CB 's guidance US first and S.I. unit second. Annex B was updated as well.
282	5.7.1.1.1	5.7.1.1.1	T	S.I units required	Change to … 9 g/m (50 gr/ft)	Accept with modification: Following CB 's guidance US first and S.I. unit second. Annex B was updated as well.
54	5.7.1.1.2	5.7.1.1.2	t	Suggest removing the quantity requirement. There is research demonstrating that small quantities of peroxides are sufficient for detection - including reference 19 in this document, work by DSTL, and TSWG. Milligram quantities have been used for over 15 years in training and testing without issue.	Peroxide based and ETN explosives, limited to 1 g to 2 g in order to handle and transport the explosives safely.	Accept with modification: This section was revised. Second sentence was deleted.
135	5.7.1.1.2	5.7.1.1.2	T	in regards to the statement that begins, "At least 1g of the explosive..." There is no basis for this requirement. It's not only the quantity of explosive but how it's contained and formulated that should determine whether or not TAs can be used in assessments. We have gravimetric measurements showing that a non-detonable TA containing 50mg TATP has a much higher emission rate than neat 1g TATP contained in the typical FBI vial configuration [small diameter plastic vial with perforated lid]. Independent measurement of the same non-detonable TATP TA in a different configuration gave an emission rate equivalent to more than 300g TATP. ATF would also argue that their trace amounts on filters are adequate for assessing canine odor recognition of TATP and HMTD. Who defines what is a "trace" amount?	Change sentence to: "Neat peroxide-based and ETN explosives should be limited to 1 g to 2 g in order to handle and transport the explosives safely. This does not apply to validated, non-detonable equivalents, which may be used as specified by the manufacturer."	Reject: Clarification was added in section 4.2.1.5 and 6.5.2 that actual explosives shall be used for imprinting and certification. Clarification was added to section 7.1 note for the acceptable uses for non-detonable or non-hazardous training.
136	5.7.1.1.2	5.7.1.1.2	T	In regards to the "NOTE" huh? relevance? Note is completely out of place and hanging. No idea to what it is referring.	Delete NOTE	Reject: This note responds to guidance regarding the US/S.I. units that follow ASB's procedures.
283	5.7.1.1.2	5.7.1.1.2	E	Correctly said: peroxide-based	Add dash	Accept
333	5.7.1.1.2/6.5.1.2	5.7.1.1.2/6.5.1.2	T	Adding a caveat or footnote	to support permitting the current ATF training methods that utilize <1 gram of material (HMTD/TATP).	Accept with modification: Both sections (5.7.1.1.2/6.5.1.2) were revised. Second sentence was deleted.
3	5.8	5.8	T	The Handler must verbally call the area hot or use a pre-defined signal to the assessor to indicate they believe the canine has alerted to the odor of explosives. The final determination should not be made off of the canine's response, but rather the handler's interpretation of that response.	Add this requirement to the section.	Reject: Handler's interpretation of canine's response is covered in this section. See 5.8.1.1.6.

#	Section (original comment)	Updated section for this comment	Type of Comment	Comments	Proposed Resolution	Final Resolutions
334	5.8.1.1.1/5.8.1.2.1	5.8.1.1.1/5.8.1.2.1	T	rewording for clarification	The ability of the canine to detect trained explosive odors while discriminating from non-explosive odors commonly found in operational settings. 5.8.1.2.11EReplace wordfrom sight with site. Table A.2 page 39T Remove punctuation bullet point (bullet) next to Aluminum Powder which is part of Ammonium Nitrate Aluminum Powder (ANAL)	Reject: The existing statement is inclusive of the proposed recommendation. The proposed recommendation does not provide added clarification to section 5.8.1.1. Accept: Section 5.8.1.2.11 was updated as suggested. Accept with Modification: Table A.2 was updated and the correct material is listed as Ammonium Nitrate Aluminum (ANAL).
137	5.8.1.1.5 & 5.8.1.1.6	5.8.1.1.5 & 5.8.1.1.6	T	What does it matter what the final response is? It's not the final response that is important but the change of behavior [the "alert"], and as long as handlers are able to interpret their canines' COB to make a correct target call, that's all the ORT should be assessing.	Recommend changing to 5.8.1.1.5 The canine's ability to identify trained odor/scent 5.8.1.1.6 The handler's ability to interpret the canine's COB	Reject with modification: Sections 5.8.1.1.5, 5.8.1.1.6, 5.8.1.2.4 and 5.8.1.2.6 are appropriate as written, however, clarification was added by replacing the word "interpretation" with "recognition".
30	5.8.1.1.7	5.8.1.1.7		Odor recognition assessment; operational or non-operational testing. A combination of the two are best for evaluating the canine just as long as the non-operational testing is not more than 3-4 odors that needed to be found. Having too many odors in non-operational testing causes the canine to lose interest in searching because the finds are so frequent. In operational testing, the finds are more spread out so that the canine has to search (hunt) for the aid and stimulates the natural prey drive.		Reject: No proposed resolutions was given. The parameters of the odor recognition assessment are listed in section 5.8.1.1.8 - 5.8.1.1.9.
352	5.8.1.1.8	5.8.1.1.8	T	Neither form of odor recognition assessment implies proficiency in actual operational environments.	The note from 5.8.1.1.9 "NOTE Successful completion of this test does not indicate proficiency in operational environments." also applies to the operational odor rec assessments, and as such, this note should also exist in 5.8.1.1.8.	Reject: The note is not appropriate in this section as it is operationally focused.
353	5.8.1.1.8	5.8.1.1.8	T	The following subsections are redundant as they are already covered in the later section of the document (5.8.1.2) that is clearly referenced in 5.8.1.1.8: 5.8.1.1.8.3; 5.8.1.1.8.5; 5.8.1.1.8.6; 5.8.1.1.8.7; 5.8.1.1.8.8;	Streamline the document by deleting the duplicative/redundant sections: 5.8.1.1.8.3; 5.8.1.1.8.5; 5.8.1.1.8.6; 5.8.1.1.8.7; 5.8.1.1.8.8;	Reject: Although the appear to be redundant, the sections are enforcing the protocol of the specific assessment.
284	5.8.1.1.8.1	5.8.1.1.8.1	E	You cannot use a 'forward' reference (5.8.1.2 has not occurred yet)	Convey information another way	Reject: Forward references are permitted under the ASB requirements.
138	5.8.1.1.8.1 & 5.8.1.1.2	5.8.1.1.8.1 & 5.8.1.1.2	T	this is very confusing - it's not clear which parts of 5.8.1.2 apply and which don't	Recommended change: "5.8.1.1.8 The operational odor recognition assessment shall be conducted following the components and parameters described in 5.8.1.2 but with the following changes: 5.8.1.1.8.1 The target odors shall be placed in a manner that the odor is readily available, but still concealed from the canine and handler. Commonly, the baggage/parcels assessment is utilized for an operational odor recognition assessment."	Reject: This is addressed in 5.8.1.1.8.2 and making this modification would add redundancy to the section.
285	5.8.1.1.8.2	5.8.1.1.8.2	E	What is 'concealed from the canine.' The target is *visibly* concealed.	Change to: …still visibly concealed…	Accept.
286	5.8.1.1.8.2	5.8.1.1.8.2	E	The term 'baggage/parcel assessment' is not defined or specified	Change to: Commonly, baggage and parcel packaging is…	Partial Accept. Reference to baggage/parcel assessment added (5.8.1.2.19.1)
287	5.8.1.1.8.3	5.8.1.1.8.3	T	It is totally unclear what "parameters of the assessment' are to be conveyed to the handler. The size, identify and location of the targets???	Rethink this element adding specifics about what parameters are to be disclosed.	Reject: Specific parameters are addressed in each assessment section. For this section they are addressed later in the document in 5.8.1.2. That reference is listed above in 5.8.1.1.8.1.
4	5.8.1.1.8.4	5.8.1.1.8.4	T	The Handler should never know the total number of target odors. If they do, they will start gaming the system and calling the area hot if they have additional false or non-productive responses to use to ensure they don't receive a miss.	Change the wording to they should NOT know the number of target odors.	Accept with modification: This section was revised and "may" was replaced with "shall not".
139	5.8.1.1.8.4	5.8.1.1.8.4	T	Why is it necessary that the handler knows how many targets there are? Handlers should never know the number of targets regardless of whether it's an ORT or an operational assessment. Knowing the number of targets in advance could bias results [handlers not making a call on a false alert, for example, when the his/her dog has already found all targets but still has not completed the search].	Delete first portion of sentence or reword such that it states the canine handler will NOT know the total number of target odors.	Accept with modification: This section was revised and "may" was replaced with "shall not".

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288	5.8.1.1.8.4	5.8.1.1.8.4	T	In light of the (poor) Litt paper, is it important to allow knowledge of the number of targets???	Rethink this.	Accept with modification: This section was revised and "may" was replaced with "shall not".
410	5.8.1.1.8.5	5.8.1.1.8.5	T	5.8.1.1.8.5 Do not recommend this as a standard. Handlers should read their own agency policies and become familiar with the criteria and standards for assessments and evaluations, by their agency. This can also lead to handlers counting aids during testing and becoming confused.	Remove	Accept with modification: This section was revised and "may" was replaced with "shall not". (NOTE Working group believe this comment and suggestion was intended for 5.8.1.1.4)
289	5.8.1.1.8.7	5.8.1.1.8.7	T	This element misses a critical point, namely **the assessor shall not cue the handler** by being visible. This can be accomplished in a number of ways, staying out of the line of sight of the handler and target, video camera, semi-transparent mirror, drone, wear a mask...	Add sentence: It is important for the assessor not to inadvertently cue the handler during the assessment. AND NOTE: This may be accomplished by {insert a list of relevant suggestions here)	Reject: this is intended to be a single blind assessment, this recommended modification is appropriate for a double blind assessment.
140	5.8.1.1.8.8	5.8.1.1.8.8	T	This makes no sense. Odor recognition should be conducted such that there is minimal to no environmental effects, and teams either successfully completed the ORT or they didn't.	Delete 5.8.1.1.8.8 OR change to: 5.8.1.1.8.8 The assessor may take into consideration the environmental influences on the odor in determining whether or not the canine team may repeat portions of the odor recognition assessment.	Reject: Portions of the test cannot be repeated. Final response location can slightly change throughout based on environmental factors (e.g., cross winds). Subsection relates to an operational odor recognition search.
141	5.8.1.1.8.9	5.8.1.1.8.9	T	In regards to the "NOTE" this also applies to above section - success in the "operational" ORT does not indicate "operational" proficiency	move NOTE to follow immediately after 5.8.1.1	Reject: This section has the note, and not the others, because this section describes non-operational assessment. The operational odor recognition assessment is completed in the canine's intended operational/mission environment and is therefore indicated in the proficiency of the team.
290	5.8.1.1.9 NOTE	5.8.1.1.9 NOTE	E	"Test" undermines the totality of the assessment	Change to: ...this assessment does...	Accept
5	5.8.1.1.9.2	5.8.1.1.9.2	T	The Handler should never know the total number of target odors. If they do, they will start gaming the system and calling the area hot if they have additional false or non-productive responses to use to ensure they don't receive a miss.	Change the wording to they should NOT know the number of target odors.	Accept with modification: This section was revised and "may" was replaced with "shall not".
142	5.8.1.1.9.2	5.8.1.1.9.2	T	see comment in 5.8.1.1.8.4	see comment 83, line 95	Accept with modification: This section was revised and "may" was replaced with "shall not".
291	5.8.1.1.9.2	5.8.1.1.9.2	T	See comment #27		Accept with modification: This section was revised and "may" was replaced with "shall not".
412	5.8.1.1.9.5	5.8.1.1.9.5	T	Not applicable to all programs	Suggest making this an option because not all programs can afford this type of test using new sample containers for each assessment/test.	Reject: This comment appears to be for 5.8.1.1.9.7.2. This assessment is optional and can be interchanged with the operational odor recognition assessment.
143	5.8.1.1.9.6	5.8.1.1.9.6	T	See comment in 5.8.1.1.8.8	see comment 84, line 96	Accept with modification. Section 5.8.1.1.9.6 has been deleted. A new section 5.8.1.1.9.7.1 has been added (will be 5.8.1.1.9.6.1 once numbering has modified due to the deletion as requested)
31	5.8.1.1.9.7	5.8.1.1.9.7	T	According to the non-operational odor recognition, a minimum of 18 containers should be used; the odors should be in an unused and clean container. While this is good in theory, logistically it makes it difficult for the canine unit as these new items must be purchased for each evaluation since they require the containers to be new. If all teams were tested at the same time, it would be only a yearly purchase but most teams do not re-certify at the same time. This would require multiple purchases a year and most units do not have discretionary money for such disposable items.		Reject: This assessment is optional and can be interchanged with the operational odor recognition assessment.
354	5.8.1.1.9.7	5.8.1.1.9.7	T	Improve test rigor by lowering target density while simultaneously adding flexibility to the standard.	Change text to: "The minimum number of sample containers to be employed shall be equal to 5 times the number of targets to be tested or 30, whichever is greater."	Reject: Professional organization that conduct tests have determined that 18 is the lowest number of containers to have been used and 6 is the lowest number of targets. This statement is a "minimum" to be used. The non-operational odor recognition assessments are specifically designed to have a high target density and should be conducted in concert with a variety of operational assessments to minimize potential behavioral problems.
144	5.8.1.1.9.7 & 5.8.1.1.9.7.1	5.8.1.1.9.7 & 5.8.1.1.9.7.1	T	How were these numbers determined?	need to add justification for how these numbers were determined to be appropriate	Reject: The numbers were determined by reviewing multiple national certification bodies' guidelines/rules.

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145	5.8.1.1.9.7.2	5.8.1.1.9.7.2	T	Why is it necessary to have an external container? This is basically the ATF NORT configuration [as well as the target density], but there is no reason why there has to be an external container so long as odor is accessible but not visible.	Change "Each perforated container will be placed in a larger external container." to "Each perforated container may be placed in a larger external container for stability." or whatever the reason is for using the larger container	Reject: A majority of certification bodies require a container within a container.
292	5.8.1.1.9.7.2	5.8.1.1.9.7.2	T	There is no scientific basis to assert 'with a perforated top' is the best containerization for a training aid. Odor visualization experiment show the exact opposite. The vast majority of targets are much heavier than air (TATP 5x as heavy as air, TNT 7x). So the odors just sit in the bottom of the container for very long times waiting for diffusion in still air. The outer container is completely sufficient at confining the odor plume required for the test.	Change to: …with perforations…	Accept: First sentence was updated.
355	5.8.1.1.9.7.2	5.8.1.1.9.7.2	T	To improve rigor, standard should prohibit wood and cardboard products from being used as the sample containers as they easily stain, mar, and absorb odors.	Add restriction to the existing text: "Wood and cardboard products are prohibited from being used as sample containers."	Reject: Cardboard may be used as a one-time use container and wood may be used for a single odor. The list of example products is sufficient for products that should be used.
356	5.8.1.1.9.7.2	5.8.1.1.9.7.2	T	The requirement/direction to place the first sample container inside "a larger external container" should be removed for a number of reasons: 1) unnecessarily increases equipment/material needs, 2) prevents the use of suitable products like many COTS scent boxes, and 3) increases items to be washed between canines and after training/testing.	Delete the sentences that read "Each perforated container will be placed in a larger external container." and "All external containers must be identical." and "External containers should not be sealed or have lids."	Reject: A majority of certification bodies require a container within a container.
146	5.8.1.1.9.7.3	5.8.1.1.9.7.3	T	this combined with 5.8.1.1.9.7 gives a maximum target density of 33% - 1 out of every 3 container is a target - much too high a number that can induce behavioral problems	recommended change: "The maximum number of target containers shall not exceed a 20% loading, i.e., no more than 3 targets for every 15 containers searched."	Reject: Professional organization that conduct tests have determined that 18 is the lowest number of containers to have been used and 6 is the lowest number of targets. This statement is a "minimum" to be used. The non-operational odor recognition assessments are specifically designed to have a high target density and should be conducted in concert with a variety of operational assessments to minimize potential behavioral problems.
357	5.8.1.1.9.7.4	5.8.1.1.9.7.4	T	To improve rigor, non-target usage should be increased and diversified while adding flexibility to the standard.	Change text to: "The minimum number of *unique* non-targets to be included shall be equal to 3 times the number of targets or 18, whichever is greater. These non-targets should be roughly divided evenly between distractors and controls."	Reject: Professional organization that conduct tests have determined that 18 is the lowest number of containers to have been used and 6 is the lowest number of targets. This statement is a "minimum" to be used. The non-operational odor recognition assessments are specifically designed to have a high target density and should be conducted in concert with a variety of operational assessments to minimize potential behavioral problems.
32	5.8.1.1.9.7.4	5.8.1.1.9.7.4		A minimum of six different distractor odors shall be used during non- operational testing. Again, while not bad in theory, it changes from an odor recognition test to a distractor test. If a desire to test the canine on distractors is needed, an operational search would be better as the distractors are in a natural environment rather an artificial one containing a concentration of both explosive odors and distractors.		Reject: This assessment is optional and can be interchanged with the operational odor recognition assessment.
293	5.8.1.1.9.7.5	5.8.1.1.9.7.5	T	Is the symmetry of the containers important if anything goes?	Delete this element or demonstrate why it is important.	Reject: These are examples of potential arrangements to be used at the evaluators' discretion.
147	5.8.1.1.9.8	5.8.1.1.9.8	T	What does this mean? The team gets two passes AND gets to try twice? Seems overly generous, particularly for an ORT.	recommended change: "Teams will be allowed two passes to search the ORT array. At the assessor's discretion, teams may be allowed a second attempt to search the array."	Accept with Modification: This section was edited for clarity.
358	5.8.1.1.9.8	5.8.1.1.9.8	T	The two attempts at the assessment needs better explanation.	Outline basic restrictions/guidelines for the second attempt. For example, if the team misses just one of the targets, do they re-do the entire test (all of the odors)? Is odor placement required to be changed before the second attempt?	Reject with Modification: This section was edited for clarity.
148	5.8.1.1.9.9	5.8.1.1.9.9	T	In regards to "two false indication/non-productive responses." 2 NPRs out of 18 containers = 11%, which is higher than the stated certification passing requirement of 10% or lower "false alert" rate	Change to 1 NPR for 18 containers or increase the number of containers to 20.	Accept with Modification: This section was edited for clarity.

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359	5.8.1.1.9.9	5.8.1.1.9.9	T	This section is unique compared to the rest of section 5 in that it gives explicit pass/fail criteria for the non-operational odor rec assessment. No such criteria are given for the operational odor rec assessments, nor the operational assessments. As such, I think this section causes confusion/conflict. I think section 5 should focus on rigorous defining parameters, leaving the pass/fail/criteria guidance for section 6 (certifications).	Delete section 5.8.1.1.9.9. If wanting to address pass/fail requirements in Section 5, the following text can be added to 5.1: "For non-certification activates, pass/fail criteria should be determined by the responsible organization, but should be standardized within the organization, dependent on the phase of the canine team's training/experience, and considerate of the scope of the test (e.g., number of targets included). Pass/fail criteria for certifications are discussed in Section 6."	Reject: This section was edited for clarity. However, pass/fail criteria describe the assessment. See section 5.8.1.2 for the pass/fail criteria for the operational odor recognition assessment.
149	5.8.1.1.9.10 a	5.8.1.1.9.10 a	T	Huh? Minimum required final response makes no sense. The handler can only call based on his canine's behavior. If the dog fails to find a target, that is not the handler failing to "articulate...[a] final response."	This statement should be written that the team fails to find all target odors. This could be due to either [1] dog not finding odor [canine miss] or [2] dog finding odor but handler failing to call [handler miss]	Accept with Modification: Section 5.8.1.1.9.10-a was modified for clarity.
411	5.8.1.1.9.10 d	5.8.1.1.9.10 d	E	Bark is considered a response not necessary an aggressive behavior.	delete "bark"	Reject with modification: The statement was clarified to read: "d) biting, scratching, aggressively disturbing, and/or barking directed towards a placed target odor; and/or ". Noise activated explosive devices will be activated by a bark, therefore barking is not an acceptable action for explosive detection canine.
150	5.8.1.1.9.10 d	5.8.1.1.9.10 d	T	How is bark an aggression?	Delete "bark" from the list	Reject with modification: The statement was clarified to read: "d) biting, scratching, aggressively disturbing, and/or barking directed towards a placed target odor; and/or ".
23	5.8.1.1.9.10(d)	5.8.1.1.9.10(d)	T	Bark included in aggression toward explosive	Exclude a simple bark which might be open to debate if canine is vocal in general and this does not influence potential device	Reject with modification: The statement was clarified to read: "d) biting, scratching, aggressively disturbing, and/or barking directed towards a placed target odor; and/or ". Noise activated explosive devices will be activated by a bark, therefore barking is not an acceptable action for explosive detection canine.
151	5.8.1.2.5 & 5.8.1.2.6	5.8.1.2.5 & 5.8.1.2.6	T	see comments on 5.8.1.1.5 and .6	same recommendations as for 5.8.1.1.5 and .6	Reject with modification: Sections 5.8.1.1.5, 5.8.1.1.6, 5.8.1.2.4 and 5.8.1.2.6 are appropriate as written, however, clarification was added by replacing the word "interpretation" with "recognition".
33	5.8.1.2.7	5.8.1.2.7	T	For EDC assessment, the assessor will evaluate the outcome of the search after final response or at the end of the entire assessment. Assessment should be done after the final response so that if the response is false, the canine is not rewarded for an NPR.		Reject: "shall" is an appropriate term, please refer to the forward section for further explanation. In assessment it is the handler's discretion whether or not they reward the canine.
294	5.8.1.2.7	5.8.1.2.7	T	See comment #28 (#289 in this spreadsheet)		Reject: this is intended to be a single blind assessment, this recommended modification is appropriate for a double blind assessment.
152	5.8.1.2.8	5.8.1.2.8	T	there is no final response in most cases in PSC/PBEDC - there is only trailing followed by an handler call this is because the target is usually moving and stopping the target so that the canine can final respond can induce behavioral problems	Change last two sentences to: "The assessor shall confirm/refute the handler's determination so that the handler can reward the canine."	Reject: a final response in PSC is not necessarily a sit, the final response may also be classified as following the target. The last sentence was updated to include a "may".
153	5.8.1.2.9	5.8.1.2.9	E	Replace "yet shall" with "but" Delete "know"	Replace "yet shall" with "but" Delete "know"	Reject: the sentence is grammatically correct as written.
154	5.8.1.2.11	5.8.1.2.11	E	Replace "sight" with "site"	Replace "sight" with "site"	Accept
155	5.8.1.2.13	5.8.1.2.13	T	Is this team simply walking through the search area or actually searching the area? How does having a team walk through the search area eliminate the potential for contamination interference? Could not the team even introduce contamination interference?	Recommend adding clarification to make clear whether or not the non-participating team is searching the area and how the team's presence can reduce contamination interference	Reject with modification: The note was revised to provide clarification that this is a walk-through not a search.
295	5.8.1.2.13	5.8.1.2.13	E	"when possible" adds nothing that "should" does not cover	Delete …,when possible,…	Reject: Not in every instance an extra dog will be available for a walk-through.
413	5.8.1.2.13	5.8.1.2.13	E	a separate, nonparticipating canine handler team should be walked through the all assessment areas.	add: For EDC "and PSC" assessments	Accept
414	5.8.1.2.13	5.8.1.2.13	T	5.8.1.2.13 This section along with the note below does not make any sense. The note says it will reduce the potential of contamination interference. Actually walking another canine team through the assessment area will increase, not decrease the contamination of the assessment area with other dog scents, movement of air and particles. Some dogs will become distracted and start tracking other dogs and handler odors. This could become a fatal distraction for the handler because they could interpret this behavior as an alert to explosive odor and the risk of NPR's increase.	Highly do not recommend 5.8.1.2.13 for evaluation testing for certifications/operational assessments. In a training environment yes, add and train with distractors including, other dog scents etc. but not during an assessment/testing for certification.	Reject with modification: The note was revised to provide clarification in regard to contamination interference. The use of the canine to walk through prior to the first handler levels the playing field for the first participant.

#	Section (original comment)	Updated section for this comment	Type of Comment (E	Comments	Proposed Resolution	Final Resolutions
156	5.8.1.2.15	5.8.1.2.15	T	In regards to the statement "Placement of distracters in the …" Distracters should be required regardless of the presence or absence of "natural distracters." The act of placing distracters serves to disturb the search area so that the target location is not the only disturbed area. In addition to distracters, controls should be used, such as empty/unused bags of the type typically used to contain powders or store explosives.	Change "Placement of distracters in the assessment area is required when no natural distracters are present." to "Intentionally placed distracters should also be used." Change "natural distractor" as discussed above	Reject: There is no limitation to putting additional artificial distracters in the search area.
360	5.8.1.2.15	5.8.1.2.15	T	Natural distracters do not have the same effect as, and thus cannot be a replacement for, true distracters.	Revise text to read: "The minimum number of *unique* non-targets to be included in each scenario/setting shall be equal to 3 times the number of targets present in the scenario. These non-targets should be roughly divided evenly between distractors and controls."	Reject: In the operational assessment no publicly available peer-reviewed material was found supporting a minimum number of distracters versus controls. Inherently in the majority of the search environments there are infinite naturally occurring distracters. There is no limitation to having additional distractors. Also a clarification was added to 5.8.1.2.1 as a note.
157	5.8.1.2.16	5.8.1.2.16	E	add comma	add comma after "person(s)"	Accept
158	5.8.1.2.16.1	5.8.1.2.16.1	E	Replace "by" with "to"	Replace "by" with "to"	Accept
159	5.8.1.2.16.2	5.8.1.2.16.2	T	This only applies if all the persons being searched are "role players." This is not necessary in the public, operational search areas such as airports and train stations. It is only necessary that the COLD decoy [1 person] is configured similarly to the HOT decoy [1 person], whether it be carried bags or on-body hides.	Change entire section to: "At least one non-target person shall be configured similarly to the target person; *e.g.,* if target odor is placed inside a backpack, then the non-target person shall also carry a backpack. If all the persons being searched are role players, then more than one non-target person should be similarly configured as the target person."	Accept with modification: This section was revised for clarity.
415	5.8.1.2.18	5.8.1.2.18	E	Bark is considered a response not necessary an aggressive behavior.	delete "bark"	Reject with modification: The statement was clarified to read: "e) Biting, scratching, aggressively disturbing, intrusive contact and/or barking directed towards a placed target odor/person. Noise activated explosive devices will be activated by a bark, therefore barking is not an acceptable action for explosive detection canine.
416	5.8.1.2.18	5.8.1.2.18	T	5.8.1.2.18 may not apply to all programs. Some programs do not restrict their teams to a certain allotted time frame to complete a search.	Remove time frames	Reject: The operational assessments are timed assessments.
417	5.8.1.2.18	5.8.1.2.18	T	5.8.1.2.18 Suggest adding test compromise as an item that can cause a handler to fail the assessment/evaluation/test.	Add h) Deliberate Compromise of a Test: The deliberate compromise of a test will not be tolerated. Any communication (in person, by cellular telephone, two-way pager, text messaging, or by any other means) between EDCHs and agency personnel participating in the testing, concerning specifics of an area still being tested, placement of explosives, or any information that could be regarded as a compromise prior to the termination (by the evaluator) will constitute a compromise of the test. Suggest adding, j) Excessive handler errors, as defined and documented by the evaluator. Suggest adding, i) when more than one explosive is missed	Reject: See certification section 6.9. It addresses this concern. Depending upon the use of the assessments (training, certification, proficiency, etc.) communication between handlers may or may not be an issue and it is up to the discretion of the organization. Recommendation (j) is covered in 5.8.1.2.18 (d) of the same section. Suggestion regarding (i) is covered by (a).
296	5.8.1.2.18	5.8.1.2.18	T	"as defined by the organization" defeats the entire purpose of a consensus Standard. Suggest a "should" which allows sufficient wiggle room for the organization.	Rewrite: …responses, which should be no more than 1…	Reject: 5.8.1.2.18- d) was re-written for clarification: "d) The canine team exceeds a 10% false or non-productive response rate. NOTE Organizations can set the threshold below 10% false or non-productive response rates."
361	5.8.1.2.18	5.8.1.2.18	T	Sub-bullet "a" needs more clarity - re: "minimum required final response(s)"; if the standard is allowing each organization to set their own criteria, then that should be more plainly stated.	Add suggested criteria or add a statement to 5.8.1.2.18 a) that states "Passing criteria should be determined by the responsible organization, but should be standardized within the organization, dependent on the phase of the canine team's training/experience, and considerate of the scope of the test (e.g., number of targets included)."	Reject: 5.8.1.2.18- a) was re-written for clarification: "a) The canine team fails to achieve a 90% positive alert rate."
160	5.8.1.2.18 a	5.8.1.2.18 a	T	see comment on 5.8.1.1.9.10 (a)	see recommended solution on 5.8.1.1.9.10(a)	Accept with Modification: Section 5.8.1.2.18-a) was modified for clarity.
161	5.8.1.2.18 c	5.8.1.2.18 c	T	This makes no sense. So the team fails if the dog can successfully complete a search faster than the "minimum specified searching time"?	Change to: "c) The canine fails to find all targets within specified search time or fails to complete the minimum specified work time."	Accept with modification: 5.8.1.2.18- b) was re-written for clarification: "b) The canine team fails to complete the assessment within the specified search time or fails to complete the minimum specified work time." 5.8.1.2.18- c was deleted.
162	5.8.1.2.18 d	5.8.1.2.18 d	T	In regards to the second sentence This seems pretty high since teams typically perform multiple operational searches. This would allow 4 NPRs if teams perform 4 operational searches, but the total number of NPRs allowed to pass an assessment is typically only 2 in all areas.	Recommend allowing only total of 2 NPRs in all search areas.	Reject: 5.8.1.2.18- d) was re-written for clarification: "d) The canine team exceeds a 10% false or non-productive response rate. NOTE Organizations can set the threshold below 10% false or non-productive response rates."

#	Section (original comment)	Updated section for this comment	Type of Comment (E or T)	Comments	Proposed Resolution	Final Resolutions
418	5.8.1.2.18d	5.8.1.2.18d	E	the amount of NPR's does not apply to all programs. Some program have a higher standard for NPR's not allowing more than two cumulative for all areas.	Suggest adding wording that programs may increase or decrease the allowed min and max amount of NPR's	Reject: 5.8.1.2.18- d) was re-written for clarification: "d) The canine team exceeds a 10% false or non-productive response rate. NOTE Organizations can set the threshold below 10% false or non-productive response rates."
163	5.8.1.2.18 e	5.8.1.2.18 e	T	remove "bark" based on comments made 5.8.1.1.9.10 d	remove "bark"	Reject with modification: The statement was clarified to read: "d) Biting, scratching, aggressively disturbing, intrusive contact and/or barking directed towards a placed target odor/person."
419	5.8.1.2.19	5.8.1.2.19	T	Not applicable to all programs	Suggest adding wording that programs may add more bags/parcels to meet their mission requirements.	Reject: 5.8.1.2.19.1.1 is a minimum. There is no limitation to a program adding more bags.
420	5.8.1.2.19	5.8.1.2.19	T	5.8.1.2.19.most programs do not place a time limit on how long it takes for a team to complete an assessment.	Suggest removing the time limit requiring a team to take no more than 2 minutes or an allotted time for items or an area to be searched.	Reject: The operational assessments are timed assessments.
421	5.8.1.2.19	5.8.1.2.19	T	5.8.1.2.19. "A minimum of one target odor shall be used for every five vehicles" is not feasible or favorable. Environmental conditions (wind, etc.) can cause overlap of odors thus making it difficult for handlers and their canines.	Suggest removing wording every five vehicles.	Reject: Please see "5.8.1.2.19.3.1.1 A **maximum** of one target odor shall be used for every five vehicles." Note: The section referred to in this comment (251 F) does not exist.
422	5.8.1.2.19	5.8.1.2.19	T	Unreasonable	Remove time frames	Reject: The operational assessments are timed assessments.
423	5.8.1.2.19	5.8.1.2.19	T	list is not all inclusive, for all programs	Suggest adding letters, envelopes and other mail articles to the list.	Accept with modification: This section was updated by adding "envelopes and other mail articles".
424	5.8.1.2.19	5.8.1.2.19	E	Not applicable to all programs	suggest adding wording here: Programs may add additional rooms and various types to meet their program needs and mission requirements.	Reject: Please refer to "5.8.1.2.19.2.1 The assessment shall include a **minimum** of three rooms." There is no limitation to a program adding more rooms.
425	5.8.1.2.19	5.8.1.2.19	E	Not applicable to all programs	suggest adding, the handler may not change the search environment in any manner	Accept with modification: Section 5.8.1.2.19.2.2 "The canine team shall not change the search environment (open any closed doors, cabinet's desk drawers, etc.) during the assessment." was updated for clarity.
426	5.8.1.2.19	5.8.1.2.19	E	Not applicable to all programs	suggest removing time frames to complete a search.	Reject: The operational assessments are timed assessments.
427	5.8.1.2.19	5.8.1.2.19	E	Not applicable to all programs	suggest adding wording here: Programs may add additional vehicles and various types to meet their program needs and mission requirements.	Reject: Please refer to "5.8.1.2.19.3.1 The assessment shall include a **minimum** of 10 vehicles." There is no limitation to a program adding more vehicles.
428	5.8.1.2.19	5.8.1.2.19	E	Not applicable to all programs	Add, perimeter sweep of the exterior of an operational building.	Reject: Please refer to "5.8.1.2.19.4.1.2 Open area/perimeter search shall be defined as building exteriors, open fields, wooded areas, and/or any area outside."
164	5.8.1.2.19.1	5.8.1.2.19.1	T	How is this any different from "operational odor recognition assessment" in 5.8.1.1.8.2	If it is not, recommend adding a note to indicate that both are the same, or better yet, don't repeat sections unnecessarily.	Reject: Operational odor recognition assessment could be comprised of baggage/parcels, vehicle, etc., assessments. This section defines the criteria for the baggage/parcels assessments. Odor/recognition assessments is not required by all organizations, however baggage/parcels are a required assessment.
362	5.8.1.2.19.1.1 & 5.8.1.2.19.1.1.1	5.8.1.2.19.1.1 & 5.8.1.2.19.1.1.1	T	Section 5 should outline the correct elements and guidelines for quality assessments. It should not mandate a minimum number of target for a scenario like it does here. Improve test rigor by decreasing target density, while adding flexibility, standardization, and scalability (by number of targets) to the standard.	Combine two sections into one that states: "The minimum number of baggage/parcel items shall be equal to 10 times the number of targets present in the scenario."	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. There is no limitation to having additional bags/parcels.
165	5.8.1.2.19.1.1	5.8.1.2.19.1.1	T	Minimum of 2 bags per target odor? that's basically a 50-50 chance of getting the right answer	Change "two to six" to "at least three total baggage…per target odor"	Reject with modification: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. The minimum number was updated to five.
297	5.8.1.2.19.1.1 and 5.8.1.2.18.1.1.3	5.8.1.2.19.1.1 and 5.8.1.2.18.1.1.3	T	The numbers do not add up. If the number of suggested articles is 10 and 6 can be used but none can be adjacent, then 1,3,5,7,9 (or 2,4,6,8,10) have targets, which only adds up to 5 not 6.	Do the math.	Reject with modification: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. The minimum number was updated to five.
6	5.8.1.2.19.1.1.4	5.8.1.2.19.1.1.4	T	Distractors (e.g., clothing, toys, food, items representative of the typical operational area, etc.) shall be placed in ALL baggage/parcel items to include the target.	Change at least one to all.	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. In the operational assessment no publicly available peer-reviewed material was found supporting a minimum number of distracters versus controls. Inherently in the majority of the search environments there are infinite naturally occurring distracters. There is no limitation to having additional distractors.
363	.8.1.2.19.1.1.	5.8.1.2.19.1.1.4	T	Distractors are specifically discussed in this EDC area (baggage/parcels), but the standard should improve rigor by increasing non-target usage and diversity; align with comment #26 in the process.	Enact comment #26 (comment #360) (Section 5.8.1.2.15) and change text here to read: "Non-targets (3 per target present in the scenario) shall be randomly placed within the baggage/parcel items just as the target odor(s)."	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. In the operational assessment no publicly available peer-reviewed material was found supporting a minimum number of distracters versus controls. Inherently in the majority of the search environments there are infinite naturally occurring distracters. There is no limitation to having additional distractors.
166	5.8.1.2.19.1.1.5	5.8.1.2.19.1.1.5	E	Can't have a "shall" definition with "etc." at the end - Shall is definite. etc. is indefinite.		Reject: See updated section 5.8.1.2.19.1.1.5.

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167	5.8.1.2.19.1.2	5.8.1.2.19.1.2	T	In regards to the sentence beginning, "Ample room (>2ft) between each article…" why 2' here but 3' in ORT [5.8.1.1.9.7.1, p.15]	Recommend being consistent between the two assessments with respect to distance - chose 2' or 3' and use it for both.	Accept: Chose (>3).
364	5.8.1.2.19.2	5.8.1.2.19.2	T	This particular EDC area (building/room) makes no mention of distractors; improve rigor and consistency by requiring non-targets in all facets of standard; align with comment #26 in the process.	Enact comment #26 (comment #360) (Section 5.8.1.2.15) and add a new subsection that reads: "Non-targets (3 per target present in the scenario) shall be randomly placed within the rooms just as the target odor(s)."	Reject: In the operational assessment no publicly available peer-reviewed material was found supporting a minimum number of distracters versus controls. Inherently in the majority of the search environments there are infinite naturally occurring distracters. There is no limitation to having additional distractors. This section was modified to read "5.8.1.2.19.2.1.1 The rooms shall be between 200 ft2 to 1200 ft2 containing items (i.e., furniture, shelves, boxes, distractors, etc.). Large rooms may be sectioned off to meet the 200 ft2 requirement. " Also a clarification was added to 5.8.1.2.1 as a note.
298	5.8.1.2.19.2.1.1	5.8.1.2.19.2.1.1	T	Only S.I. units are allowed.	Change to: 20 m^2 (200 ft^2) and 100 m^2 (1200 ft^2)	Accept with modification.
24	5.8.1.2.19.2.1.3	5.8.1.2.19.2.1.3	T	No limitations on depth of find	Make a max depth	Reject: Reviewing multiple national certification bodies' guidelines/rules and scientific literature there is no parameters on the maximum depth that would affect odor availability.
168	5.8.1.2.19.2.1.3	5.8.1.2.19.2.1.3	E	why "will" as opposed to "shall" or "may"?	change "will" to "may"	Accept with modification: "shall" was used.
299	5.8.1.2.19.2.2	5.8.1.2.19.2.2	T	Illogical. Suppose the target is within a room with a closed door. Presumably a closet door is the issue.	Change to: ..non-entry doors…	Reject with modification: See resolution of comment #425 and excel line #255. This section was clarified and the examples are merely illustrations as it is up to canine assessor to determine the search environment.
16	5.8.1.2.19.2.3	5.8.1.2.19.2.3	E	incorrect math on example	1.5 minutes per 100 ft2 searched (e.g., if the room is 500 ft2 it should take no more than 7.5 minutes to complete the search).	Accept
25	5.8.1.2.19.2.3	5.8.1.2.19.2.3	E	"two passes" not very specific	specific explanation of "two passes" ie. Enter and run room exit and re-enter? Or two patterns around room but not leave room?	Accept with modification: Note added to provide further specification about the use of term "pass".
169	5.8.1.2.19.2.3	5.8.1.2.19.2.3	T	Teams don't always perform systematic search. So how does one count the number of passes?	Recommend deleting reference to number of passes and specify only length of time needed to clear a room.	Reject: The canine team is required to perform a systematic search see 5.8.1.2.2 - 5.8.1.2.3.
170	5.8.1.2.19.2.3	5.8.1.2.19.2.3	T	Replace "hasty search(es) and/or detailed search(es)"	Replace "hasty search(es) and/or detailed search(es)" with "a scan followed by a detailed search"	Reject: See section 3 for the definition - "hasty search: A quick search of the defined area.". The use of the term scan leads to ambiguity. It is up to the canine team to determine the level of search per pass.
171	5.8.1.2.19.2.3	5.8.1.2.19.2.3	T	In regards to the sentence beginning, "The assessment should take no more…" Doesn't this depend somewhat on how big the room is and how many things are in it? A large room with lots of things in it may take longer than 1.5 min/100 ft2 because of the need to detail the things in the room.	Recommend adding note to specify complexity of room [bare vs lots of furniture/things to search] for the maximum allotted search time.	Reject: 1.5 minutes per 100 ft2 (10x10) is ample time for even complex searches. Also this section is a guideline, not a requirement, defined by the use of "should".
365	5.8.1.2.19.3	5.8.1.2.19.3	T	This particular EDC area (vehicles) makes no mention of distractors; improve rigor and consistency by requiring non-targets in all facets of standard; align with comment #26 in the process.	Enact comment #26 (Section 5.8.1.2.15) and add a new subsection that reads: "Non-targets (3 per target present in the scenario) shall be randomly placed in/on the vehicles just as the target odor(s)."	Reject: In the operational assessment no publicly available peer-reviewed material was found supporting a minimum number of distracters versus controls. Inherently in the majority of the search environments there are infinite naturally occurring distracters. There is no limitation to having additional distractors.
43	5.8.1.2.19.3	5.8.1.2.19.3		The assessment of EDC canine to locate explosives in a vehicle does not specifically address amount or concentration of odor. As discussed in 4.2.1.6 and 4.2.1.8 above, we really want to make sure we can stop the big bombs. If concentration is an issue, should not we test the dog's ability to detect a large vehicle bomb?		Accept with modification: Quantities for use are specified in section 5. There is no limitation to amounts used in training other than availability and access. Also, see updated note in section 7.1.
19	5.8.1.2.19.3.1	5.8.1.2.19.3.1	T	10 Veh might be difficult for some agencies to acquire for cert	Decrease amount of vehicles	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. Pre-planning to acquire/borrow the number of vehicles must be undertaken.
366	5.8.1.2.19.3.1 & 5.8.1.2.19.3.1.1	5.8.1.2.19.3.1 & 5.8.1.2.19.3.1.1	T	Improve test rigor by decreasing target density, while adding flexibility, standardization, and scalability to the standard.	Combine these two sections into one that states: "The minimum number of vehicles shall be equal to 7 times the number of targets present in the scenario or 10, whichever is greater."	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. In the operational assessment no publicly available peer-reviewed material was found supporting a minimum number of distracters versus controls. Inherently in the majority of the search environments there are infinite naturally occurring distracters. There is no limitation to having additional distractors.

#	Section (original comment)	Updated section for this comment	Type of Comment (E	Comments	Proposed Resolution	Final Resolutions
34	5.8.1.2.19.3.1.2	5.8.1.2.19.3.1.2		Target odors shall be placed randomly on the vehicle search. Most vehicle searches for assessment are performed at commercial rental lots with permission of the owners. Placement of the explosives can not alter the original condition of the vehicle being 'borrowed' for the assessment. Any interior placement of target odors on newer vehicles may require a longer set time due to the newness of all the seals around the door frames and trunks. These seals have not been broken in from normal use and it make take longer for odor to permeate.		Reject: A competent trainer will need to account for additional set times for interior hides on newer vehicles. The requirement has suitable flexibility for hide location to account for various organizational operational needs.
300	5.8.1.2.19.3.1.2 e)	5.8.1.2.19.3.1.2 e)	E	Presumably no additional concealment from the vehicle like a storage compartment within the trunk. The target might be in a box, baggie, backpack, etc. which is also concealment.	Change to: …concealment by the vehicle.	Accept with modification: e) closed trunk compartment with no additional concealment beyond the training aid packaging material.
172	5.8.1.2.19.3.1.4	5.8.1.2.19.3.1.4	T	so what should be the minimum distance [# vehicles] between two targets? seems like that is important to specify	Recommend specifying that vehicles should be parked in regularly spaced spots, such as in a parking lot.	Reject: this is addressed in 5.8.1.2.19.3.2
173	5.8.1.2.19.3.1.5	5.8.1.2.19.3.1.5	E	add comma	add a comma after the word "vans"	Accept
174	5.8.1.2.19.3.1.5	5.8.1.2.19.3.1.5	E	Delete the text "(subject to availability)"	unnecessary qualifier as the statement is "may be used" and not "shall be used."	Accept
175	5.8.1.2.19.3.2	5.8.1.2.19.3.2	T	Nonsense statement. So a parking area that's larger than the number of vehicles can't be used? What's "ample room"? When teams search vehicles operationally, it would be reasonable to expect that cars are parked next to each other.	Change to: "The parking area shall provide ample room between each vehicle to allow the canine handler team to move around each vehicle."	Accept with modification: statement was clarified. 5.8.1.2.19.3.2 The parking area shall be consistent with the number of vehicles to be searched or larger……
7	5.8.1.2.19.3.3	5.8.1.2.19.3.3	T	Do not limit the time "per vehicle". Limit the time based on the overall search. If the Handler chooses a search pattern as per their policy, as outlined in 5.8.1.2.19.3.3, they may choose to perform an overall scan of the area prior to detailing each individual vehicle and they should be allowed to do such.	Change the time limit from per vehicle to overall search.	Reject with modification: To address this comment, section 5.8.1.2.19.3.4 was modified. The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. This statement was modified by replacing "shall" with "should" and second sentence was added for clarity.
301	5.8.1.2.19.3.3	5.8.1.2.19.3.3	E	"organization's policy" is not the best way to say it	Change to: …organization's requirements… in two places	Accept
176	5.8.1.2.19.3.4	5.8.1.2.19.3.4	T	2 minutes per vehicle and yet 1.5 min/100 ft2 room search? relatively much more time for vehicles - why?	see resolution to comment 115, line 127 give more time to room search or less time per vehicle	Reject with modification: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. This statement was modified by replacing "shall" with "should" and second sentence was added for clarity.
429	5.8.1.2.19.4	5.8.1.2.19.4	T	5.8.1.2.19.4. An open area and perimeter search is two independent searches but can be combined. However, holding a minimum amount of SQFT for an open field/area or perimeter search is not feasible for all programs.	Open field with grass height of 6 inches or more.	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. The size of the search is appropriate for the skill being tested.
367	5.8.1.2.19.4	5.8.1.2.19.4	T	This particular EDC area (open area) makes no mention of distractors; improve rigor and consistency by requiring non-targets in all facets of standard; align with comment #26 in the process.	Enact comment #26 (Section 5.8.1.2.15) and add a new subsection that reads: "Non-targets (3 per target present in the scenario) shall be randomly placed within the area just as the target odor(s)."	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. In the operational assessment no publicly available peer-reviewed material was found supporting a minimum number of distracters versus controls. Inherently in the majority of the search environments there are infinite naturally occurring distracters. There is no limitation to having additional distractors.
44	5.8.1.2.19.4	5.8.1.2.19.4		For the assessment of a canine to locate a threat in open area/perimeter, the target odor(s) may be placed no more than 1 ft below the ground's surface and no more than 8 ft above the ground. I understand and really like the idea of burying a find and seeing if a canine can locate it, but how are the finds hidden in an open area/perimeter above ground? Are they visible objects. The reason that I like buried finds is that it tests a dog's ability to find and alert to an odor without an object associated with it. The military uses this technique with their dogs because of the threat of buried IEDs. While it is typically not our threat, we do need to be able to find hidden or concealed IEDs; ie an IED build into a wall or hidden behind a tub (similar to the Grand Hotel Bombing). A dog needs to alert on an odor even if it seems to be coming out of the electrical outlet of a wall.		Reject: Concealed hides may be placed in trach cans, bushes, gaps in the walls, trees and backpacks. The hides are not visible and are always concealed.
20	5.8.1.2.19.4.1	5.8.1.2.19.4.1	T	Depending on topo and envirement mixed with the outlined size of the search, the difficulty will vary tremendiously and not be consistant.	Decrease search area size or give more detailed peramiters of topo/envirement	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. The size and time limit of the search is appropriate for the skill being tested.
302	5.8.1.2.19.4.1	5.8.1.2.19.4.1	T	Only S.I. units are allowed.	Do the math: 1 ft^2 = 0.093 m^2	Accept

#	Section (original comment)	Updated section for this comment	Type of Comment (E...	Comments	Proposed Resolution	Final Resolutions
35	5.8.1.2.19.4.1.1	5.8.1.2.19.4.1.1		<u>Target odors may be placed no more than 1 ft below the ground's surface.</u> While a canine may find buried explosives, this test is difficult to consistently replicate. When the explosive is buried, what type of soil is used; sand, clay, potting, etc.? What is the compaction of the soil after burying? Along with other factors, burying a target will vary from test to test. All testing should be fairly the same whether testing in Alaska in March or Florida in October. There is no way to test the concentration of odor getting out of the ground by the assessor.		Reject: The operational assessment has sufficient flexibility for the competent trainer to design the test appropriate to the canine team's operational area. While it is accepted that not all parameters can be exactly the same with every assessment, the operational assessments should be representative of the canine's operational area. Additionally, there are potential hide locations that are underground but no buried like storm drains, holes, basement access windows, etc.
177	5.8.1.2.19.4.1.1	5.8.1.2.19.4.1.1	T	In regards to the first sentence - more than one target odor may be used and usually is used because of the size of the search area	change "shall" to "should"	Accept
178	5.8.1.2.19.4.1.1	5.8.1.2.19.4.1.1	T	In regards to the statement "… no more than 1 ' below the ground's surface…" - Are CONUS operational teams expected to find buried odors? What other types of hides would be below the ground's surface?	Change to: "Target odor(s) may be placed between zero and 8 feet in height. Target odors may be concealed up to one foot below ground but should not be buried."	Reject: The operational assessment has sufficient flexibility for the competent trainer to design the test appropriate to the canine team's operational area. While it is accepted that not all parameters can be exactly the same with every assessment, the operational assessments should be representative of the canine's operational area. Additionally, there are potential hide locations that are underground but no buried like storm drains, holes, basement access windows, etc.
303	5.8.1.2.19.4.2	5.8.1.2.19.4.2	T	Only S.I. units are allowed.	Do the math: 1 ft^2 = 0.093 m^2	Accept
179	5.8.1.2.19.5	5.8.1.2.19.5	E	In regards to the wording "causing restriction" = the area doesn't "cause" the restriction - it "includes" a restriction	see next comment and resolution	Accept with modification: the statement was clarified. The choke point operational assessments are designed to evaluate the canine team's ability to locate an explosive on a person in areas where people are funneled through a certain location.
180	5.8.1.2.19.5	5.8.1.2.19.5	E	Replace "certain" with "restricted"	Replace "certain" with "restricted" so that the sentence reads, "…people are funneled through a restricted location. This assessment.."	Accept with modification: the statement was clarified. The choke point operational assessments are designed to evaluate the canine team's ability to locate an explosive on a person in areas where people are funneled through a certain location.
368	5.8.1.2.19.5	5.8.1.2.19.5	T	This section noticeably contains less placement/hide ideas than the EDC areas.	Add text/bullets to this section stating where/how targets and non-targets can be placed on/carried by persons.	Accept with modification: the statement was updated for clarification in 5.8.1.2.19.5.2.2 A minimum of one target person shall carry a target odor. Potential target odor placement may include, but is not limited to: a) in a bag (knapsack, back pack, book bag, etc.) typically worn on the shoulder(s) or hand carried attaché case, computer -type bag or any other similar item used to hold, carry, and transport items; carried by the target person; b) various heights on the decoy/target person in a vest, belt, waist pack, pockets, socks, apron, pouch, hat, or any other carry method that may hold and conceal the training aids; and c) in a rolling bag, rolling back pack, wheel chair, utility cart, janitor's cart, catering cart, or other similar item where the item is controlled, pulled, pushed, or propelled by the decoy/target person.
181	5.8.1.2.19.5.1	5.8.1.2.19.5.1	T	In regards to the portion of the text that reads, "… with high volume of people passing through a particular area, usually and are at least two people wide…" - Neither is generally true. There are teams working choke point that has very low foot traffic, and typical choke point is single person passing through, not "two people wide."	Change "Choke points are also considered areas with high volume of people passing through a particular area, usually and are at least two people wide (airports, schools, mass transit locations, sport complex events, hotels, shopping malls, hospitals, government buildings, and other likewise public or private venues)." to "Choke points are locations where people are funneled into a single point of entry and may have one or more persons passing through at any given time. Examples include airport security line, mass transit station entrance, sports stadium entrance, etc."	Reject: the statement is accurate. Many of the examples listed in the resolution fall within the queue assessment.
369	5.8.1.2.19.5.2 & 5.8.1.2.19.5.2.2	5.8.1.2.19.5.2 & 5.8.1.2.19.5.2.2	T	Add flexibility, standardization, and scalability to the standard. Also, the standard needs clarity whether these persons are unknowing members of the public or if they are supplied by the assessor/program (i.e., a "decoy" as defined earlier).	Combine these two sections into a single statement and add new detail: "The minimum number of persons passing through the choke point shall be equal to 10 times the number of targets present in the scenario. Contributing to this required volume of people, for every target in the scenario, there should be a minimum of three non-target decoys also passing through the choke point."	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. In the operational assessment no publicly available peer-reviewed material was found supporting a minimum number of decoys. There is no limitation to having additional decoys.

#	Section (original comment)	Updated section for this comment	Type of Comment (E	Comments	Proposed Resolution	Final Resolutions
182	5.8.1.2.19.5.2.2	5.8.1.2.19.5.2.2	E	What does it mean "minimum one target person"? The	Change sentence to: "At least one person will have on his/her body or carry target odor."	Reject with modification: the statement was updated for clarification in 5.8.1.2.19.5.2.2 A minimum of one target person shall carry a target odor. Potential target odor placement may include, but is not limited to: a) in a bag (knapsack, back pack, book bag, etc.) typically worn on the shoulder(s) or hand carried attaché case, computer -type bag or any other similar item used to hold, carry, and transport items; carried by the target person; b) various heights on the decoy/target person in a vest, belt, waist pack, pockets, socks, apron, pouch, hat, or any other carry method that may hold and conceal the training aids; and c) in a rolling bag, rolling back pack, wheel chair, utility cart, janitor's cart, catering cart, or other similar item where the item is controlled, pulled, pushed, or propelled by the decoy/target person.
183	5.8.1.2.19.5.2.3	5.8.1.2.19.5.2.3	T	in respect to the word "randomly" - what does this mean? randomly with respect to what? this implies that a target person will pass through the choke point more than once during a 20-min search. Unless there's compelling reason [like assessment leading into training], target person should never enter the search scenario more than once, especially at a choke point where it becomes visually obvious.	Change to: "Target person(s) shall pass through the choke point at random times so that teams don't come to expect a target at specific times. Each target person should only pass through the choke point once, unless the assessor has compeling reason to provide teams with additional opportunities to encounter the target person during the search."	Accept with modification: Clarification was added to the statement. 5.8.1.2.19.5.2.3 At a randomly selected time, the target person(s) shall pass through the choke point.
8	5.8.1.2.19.5.2.4	5.8.1.2.19.5.2.4	T	Distractors should be carried by ALL non-target persons and the target.	Change at least one to all.	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. In the operational assessment no publicly available peer-reviewed material was found supporting a minimum number of decoys. There is no limitation to having additional distractors.
184	5.8.1.2.19.5.2.4	5.8.1.2.19.5.2.4	T	controls also need to be included here as elsewhere [see 5.8.1.2.15, p.17]	Add use of controls [e.g., backpacks, wrappers...] in addition to distractors	Reject: Controls are included in this assessment. See 5.8.1.2.16.2
370	5.8.1.2.19.5.2.4	5.8.1.2.19.5.2.4	T	Distractors are specifically discussed in this PSC area (choke point), but the standard should improve rigor by increasing non-target usage and diversity; align with comment #26 in the process.	Enact comment #26 (Section 5.8.1.2.15) and change text here to read: "Non-targets (3 per target present in the scenario) on/with decoys shall randomly pass through the choke point just as the target person(s)."	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. In the operational assessment no publicly available peer-reviewed material was found supporting a minimum number of decoys. There is no limitation to having additional distractors.
371	5.8.1.2.19.6	5.8.1.2.19.6	T	This section noticeably contains less placement/hide ideas than the EDC areas.	Add text/bullets to this section stating where/how targets and non-targets can be placed on/carried by persons.	Accept with Modification: the statement was updated for clarification in 5.8.1.2.19.6.2.3 The target person(s) shall be randomly placed in the crowd. Potential target odor placement may include, but is not limited to: a) in a bag (knapsack, back pack, book bag, etc.) typically worn on the shoulder(s) or hand carried attaché case, computer -type bag or any other similar item used to hold, carry, and transport items; carried by the target person; b) various heights on the decoy/target person in a vest, belt, waist pack, pockets, socks, apron, pouch, hat, or any other carry method that may hold and conceal the training aids; c) in a rolling bag, rolling back pack, wheel chair, utility cart, janitor's cart, catering cart, or other similar item where the item is controlled, pulled, pushed, or propelled by the decoy/target person; and d) items within the physical environment (e.g., trash cans, vehicles, baggage, etc.).
372	5.8.1.2.19.6	5.8.1.2.19.6	T	This particular PSC area (crowd) makes no mention of distractors; improve rigor and consistency by requiring non-targets in all facets of standard; align with comment #26 in the process.	Enact comment #26 (Section 5.8.1.2.15) and add a new subsection that states: "Non-targets (3 per target present in the scenario) on/with decoys shall be randomly placed in the crowd just as the target person(s)."	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. In the operational assessment no publicly available peer-reviewed material was found supporting a minimum number of decoys. There is no limitation to having additional distractors.
304	5.8.1.2.19.6.1	5.8.1.2.19.6.1	T	Only S.I. units are allowed.	Do the math: 1 ft^2 = 0.093 m^2	Accept
373	5.8.1.2.19.6.2	5.8.1.2.19.6.2	T	The source of the 20 persons is not well understood - the standard needs clarity whether these persons are unknowing members of the public or if they are supplied by the assessor/program (i.e., a "decoy" as defined earlier). Plus, standard should have flexibility, standardization, and scalability.	Add new detail: "The minimum number of persons in the crowd shall be equal to 10 times the number of targets present in the scenario or 20, whichever is greater. Contributing to this required crowd, for every target in the scenario, there should be a minimum of three non-target decoys also in the crowd."	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. In the operational assessment no publicly available peer-reviewed material was found supporting a minimum number of decoys. There is no limitation to having additional decoys.
185	5.8.1.2.19.6.3	5.8.1.2.19.6.3	T	why 15 minutes for crowds but 20 minutes for choke point and line/queue?	add explanation on why the need for different times	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules.

#	Section (original comment)	Updated section for this comment	Type of Comment	Comments	Proposed Resolution	Final Resolutions
374	5.8.1.2.19.7	5.8.1.2.19.7	T	This section noticeably contains less placement/hide ideas than the EDC areas.	Add text/bullets to this section stating where/how targets and non-targets can be placed on/carried by persons.	Accept with modification: the statement was updated for clarification in 5.8.1.2.19.7.2.1
305	5.8.1.2.19.7.1	5.8.1.2.19.7	T	When something says "may or may not" it means nothing at all.	Delete or make a statement about noting the wind direction.	Reject: This statement is accurate. The handler may be able to get into an advantageous position when the wind is moving in the preferred discretion, however, this is not always the case because they are limited by the queue design vs, putting themselves in an ideal position that could change based on the wind.
306	5.8.1.2.19.7.1	5.8.1.2.19.7.1	E	"Likewise"?	Better said: …other similar…	Accept
375	5.8.1.2.19.7.2 & 5.8.1.2.19.7.2.1	5.8.1.2.19.7.2 & 5.8.1.2.19.7.2.1	T	Add flexibility, standardization, and scalability to the standard. Also, the standard needs clarity whether these persons are unknowing members of the public or if they are supplied by the assessor/program (i.e., a "decoy" as defined earlier).	Combine these two sections into a single statement and add new detail: "The minimum number of persons passing through the line/queue shall be equal to 10 times the number of targets present in the scenario. Contributing to this required volume of people, for every target in the scenario, there should be a minimum of three non-target decoys also passing through the choke point."	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. In the operational assessment no publicly available peer-reviewed material was found supporting a minimum number of decoys. There is no limitation to having additional decoys.
		5.8.1.2.19.7.2.2		WG edit/note		The working group updated this section to match with section 5.8.1.2.19.5.2.3.
9	5.8.1.2.19.7.2.3	5.8.1.2.19.7.2.3	T	Distractors should be carried by ALL non-target persons and the target.	Change at least one to all.	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. In the operational assessment no publicly available peer-reviewed material was found supporting a minimum number of distracters versus controls. Inherently in the majority of the search environments there are infinite naturally occurring distracters. There is no limitation to having additional distractors.
186	5.8.1.2.19.7.2.3	5.8.1.2.19.7.2.3	T	controls also need to be included here as elsewhere [see 5.8.1.2.15, p.17]	see comment 130, line 128	Reject: Controls are included in this assessment. See 5.8.1.2.16.2
376	5.8.1.2.19.7.2.3	5.8.1.2.19.7.2.3	T	Distractors are specifically discussed in this PSC area (queue), but the standard should improve rigor by increasing non-target usage and diversity; align with comment #26 in the process.	Enact comment #26 (Section 5.8.1.2.15) and change text here to read: "Non-targets (3 per target present in the scenario) on/with decoys shall randomly pass through the line/queue just as the target person(s)."	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. In the operational assessment no publicly available peer-reviewed material was found supporting a minimum number of distracters versus controls. Inherently in the majority of the search environments there are infinite naturally occurring distracters. There is no limitation to having additional distractors.
377	5.8.2	5.8.2	T	Section is confusing, especially in regards to intent and requirements	Retain the text only from Sections 5.8.2 and 5.8.2.2 (i.e., delete 5.8.2.1; 5.8.2.3; 5.8.2.4; 5.8.2.5; and 5.8.2.6). In the text within 5.8.2, add: "Double-blind assessments, as defined in Section 3.15, may be advantageous for some programs, and as such, can be completed using the parameters outlined in Section 5.8.1 as deemed appropriate/beneficial by the responsible organization."	Reject: Double-blind assessments are a requirement to be completed by all explosive detection canines at least every six months. Therefore, the variation in requirement(s) needs to be explained.
10	5.8.2.2	5.8.2.2	T	The Assessor should always know the location of the target odor for safety reasons, and for the ability to control the search area properly. At no time should it be acceptable for the assessor to not know how to properly manage a search area based on lack of knowledge.	Change the definition for a Double Blind to "neither the Handler nor the Canine knows the location of the Training Aid". Change the definition of a Single Blind to the "Handler knows the location of the Training Aid but the Canine does not."	Reject: The resolution as stated describes a single-blind assessment. The statement is accurate.
187	5.8.2.2	5.8.2.2	T	How does the assessor know that the team has "successfully completed the assessment" if the assessor doesn't know what the "correct" outcome is?

This would require additional support personnel to set up the search then leave the search area before the assessment begins, This is not an easy lift for most agencies; so it's worth spelling out. | change "...neither canine handler, nor the assessor, nor any individual present with the canine team shall know..."

to "...neither canine handler nor the assessor will know the..." | Reject: See 5.8.2.4 which addresses the comment raised. Double-blind assessments have significantly more support and set up requirements to be achieved. Alternatively, double-blind assessments can be completed by having the assessor watch the assessment from behind a two way mirror or via video in a separate location to observe the canine team. |
| 188 | 5.8.2.3 | 5.8.2.3 | T | This would require that the assessor "look up the answer" in order to confirm whether or not the team has made a correct indication. This would cause a delay in rewarding the dog after a correct detection or correcting the dog after an NPR. This doesn't seem to add much value to the "double blind" aspect of the assessment. | recommend deleting double-blind discussion or clarifying that double-blind is only with respect to assessed team and assessor, but someone at the scene does know outcome and can inform team whether or not an indication should be rewarded or corrected | Reject: Double-blind assessments should have the same reward schedule as an operational search (i.e. the canine is not rewarded). In instances where the assessor can remotely view the assessment, there will not be a limitation to verbally indicating the correct or incorrect response allowing the handler to reward the canine as appropriate. |
| 307 | 5.8.2.4 | 5.8.2.4 | T | How shall the observer observe the team? | Better said: ..team remotely. | Reject: The assessor can be in the room if they do not know the hind location. They could also observe remotely if the assessment is designed for remote viewing. |
| 189 | 5.8.2.5 & 5.8.2.6 | 5.8.2.5 & 5.8.2.6 | T | See comment above on questionable utility of double-blind assessment.
Why can't single-blind assessment also be used for proficiency testing? | same recommendation as above comment 132, line 144 | Reject: single-blind assessments can be used for proficiency testing. Double-blind assessments are necessary as an objective "check" om the canine team to remove the possibility of inadvertent cueing. Additionally, double-blind assessments are the closest to the canine's operational environment as the nature of an alert in the field is rarely known. |
| 308 | 5.8.2.6 | 5.8.2.6 | T | Any??? Drugs, Bed Bugs? | Change to: Any of the specific explosives assessments… | Accept with Modification: 5.8.2.6 Any explosives detection double-blind assessment may be used for proficiency testing. |

#	Section (original comment)	Updated section for this comment	Type of Comment	Comments	Proposed Resolution	Final Resolutions
378	5.8.2.6	5.8.2.5	T	Text states that double-blind assessments are required every 6 months.	Delete entire bullet (if not already deleted as result of comment #43)	Reject: Double-blind assessments are required assessments.
36	6.1	6.1		Certification is valid for one year. Again, in theory this works well but it cannot be guaranteed that a canine team will be able to certify exactly on a yearly time table. For example, if an external assessor needed to travel to assess a team, things like the current quarantine would hamper any assessment. There has to be an open time frame. Yearly assessment with extensions up to 14-16 months.		Reject: Even though we acknowledge the fact there are other time lapses for certification. The goal for the document is to standardize the certification. Please refer to the American National Standard (ANS) "ANSI/ASB Standard 088, General Guidelines for Training, Certification, and Documentation of Canine Detection Disciplines."
260	6.1	6.1	E	Document states certfication valid for 1 yr, however TSA Certification valid 12-14 months due to the large number of LEO and TSA Security Operations teams requiring certifications coordination, scheduling, and execution every year.	Allow team certification to be valid up to 14 months. Agreeable as the accepted standard. However, team and evaluator availability could be an issue in larger programs. Add Certifying Entity may grant up to two month extension based on team/evaluator availability if lapse is no fault of the team and all other requirements are met.	Reject: Even though we acknowledge the fact there are other time lapses for certification. The goal for the document is to standardize the certification. Please refer to the American National Standard (ANS) "ANSI/ASB Standard 088, General Guidelines for Training, Certification, and Documentation of Canine Detection Disciplines."
11	6.2	6.2	T	Add the minimum weekly training requirement of four hours per week.	Add this requirement to the section.	Reject: Training requirements are addressed in 7.4. A minimum of sixteen hours of training per month is a standard amongst the law enforcement and professional canine communities. Four hours a week may not be achievable for all organizations, however, they must meet the 16 hr./month minimum that can be split as allowable by the operational tempo of the canine team.
190	6.2	6.2	E/T	Add the word "and" Delete "double-blind assessments," - double-blind assessments cannot be required ["shall"]	Add the word "and" and delete "double-blind assessments," so that it reads, "… documented maintenance training and periodic proficiency assessments, and follow other…"	Reject: Double-blind assessments are a requirement to be completed by all explosive detection canines at least every six months.
191	6.2	6.2	E	Replace "continuous" with "continuing" - as opposed to "continuous" - when teams are operationally deployed, they are not training; hence, they cannot conduct training continuously	Replace "continuous" with "continuing"	Accept
379	6.2	6.2	E	It is odd that double blind assessments are explicitly mentioned in this section when they are already encompassed by the more generic "proficiency assessments"	Change text to read: The canine team shall perform regular documented maintenance training, periodic proficiency assessments, and follow other Federal, state, and local guidelines. Certification does not remove the requirement for continuous proficiency training.	Reject: Double-blind assessments are a mandatory assessment type that is often overlooked in detection canine training disciplines. It is called out specifically to enhance the requirement and added redundancy.
12	6.4	6.4	T	As the current definition stands of a "Double Blind", no certification should ever be conducted where the assessor does not know the location of the training aid. For the purpose of safety plus the ability to properly manage the search area, especially the integrity of the test.	Remove this requirement from the section.	Reject: Double-blind assessment can be conducted safely with ample support and planning.
442	Table 1 - Certification Assessments	Table 1 - Certification Assessments	E	Not applicable to all programs	add Warehouse to the Additional Required Assessment (s) column	Reject: Warehouses fall within the building search requirements.
309	6.5	6.5	T	There is no scientific basis to assert 1/4 lb. is optimal for this purpose. How is it packaged, what is the surface area?	Change to a "should" until proof is available	Reject: The minimums were determined by reviewing multiple national certification bodies' guidelines/rules. We acknowledge that there are limitations and unknowns surround the selection of this minimum, however, a value must be designated to set the standard. As peer reviewed literature is published defining the minimum amount, the standard shall be revised as necessary.
310	6.5	6.5	T	S.I. units are required	Change to …0.11 Kg (1/4 lb.). Or it could be 0.1 Kg (1/4 lb.).	Accept
192	6.5.1	6.5.1	E	Duplicate content should be avoided as errors corrected in one place may be missed in another - it should be sufficient to refer the reader to the previous sections for the same information	delete duplicate content between different sections and use section number to reference needed content	Reject: While repetitive, the information is of sufficient importance that it should be stated in this section as well.
193	6.5.1	6.5.1	T	See individual sections for comments	All comment made in previous sections on same content also apply here - 6.5.1 = 5.7.1.1 6.5.1.1 = 5.7.1.1.1 6.5.1.2 = 5.7.1.1.2 list under 6.5.2 = list under 4.2.1.5 list under 6.5.3 = list under 4.2.1.6	Reject: While repetitive, the information is of sufficient importance that it should be stated in this section as well. Refer to comment resolutions in the previous sections 4.2.1.5, 4.2.1.6, 5.7.1.1, 5.7.1.1.1 and 5.7.1.1.2
430	6.5.1	6.5.1	E	Delete, repetitive in 5.7.1.1		Reject: While repetitive, the information is of sufficient importance that it should be stated in this section as well.
194	6.5.1.1	6.5.1.1	T	see comment on 5.7.1.1.1		Accept: while repetitive, the information is of sufficient importance that it should be stated in this section as well. Explanation added to Annex B.
311	6.5.1.1	6.5.1.1	T	S.I. units are required	See comments 33 and 34	Accept

#	Section (original comment)	Updated section for this comment	Type of Comment (E	Comments	Proposed Resolution	Final Resolutions
431	6.5.1.1	6.5.1.1	E	Delete, repetitive in 5.7.1.1.1		Reject: While repetitive, the information is of sufficient importance that it should be stated in this section as well.
195	6.5.1.1 Table 1	6.5.1.1 Table 1	T	in regards to "EDC w/PSC" and "- choke point" - Who decided that EDC with PSC only needs to be assessed in choke point scenario? This is less than required from IPWDA certification.	Delete all reference to EDC w/PSC and use only PSC - certification should follow IPWDA's protocols for PBEDC	Reject: There are three distinct categories of explosive detection canines that require specific and different training appropriate to their category as illustrated in this table. The requirements were determined by reviewing multiple national certification bodies' guidelines/rules and were deemed appropriate to fulfill the scope of this document.
196	6.5.1.1 Table 1	6.5.1.1 Table 1	T	in regards to line of table for "PSC" - see previous discussion regarding EDC vs PSC PSC must pass EDC certification prior to being assessed for PSC capability.	same as above	Reject: There are three distinct categories of explosive detection canines that require specific and different training appropriate to their category as illustrated in this table. The requirements were determined by reviewing multiple national certification bodies' guidelines/rules and were deemed appropriate to fulfill the scope of this document.
18	Table 1	Table 1	E	Table 1 is out of place	Table 1 should be directly after 6.4	Accept
380	Table 1, p. 23	Table 1, p. 23	T	There are assessment areas listed in this table that are not discussed in Section 5, and as such, there is no standard or guidelines for quality and rigorous assessment/conduct.	Remove the following areas from being options for certification: Aircraft; Maritime vessel; Mass transit vehicles.	Reject: Section 5.8.1.2.19.8 covers this information.
381	Table 1, p. 23	Table 1, p. 23	T	Appropriately, the standard seeks to avoid the certification from being overly burdensome. Consequently, though, based on current language this could result in certifications that encompass just six target exposures over four searches/assessments (a related side note is that a six target exposure cert does not align well with the current pass/fail criteria as one miss (5/6) equates to 83% - well below the 90% limit). To ensure more comprehensive and rigorous certifications, additional direction and restriction is required. Recommend mandating that certifications for each discipline include: (1) a 6-target odor recognition assessment **and** (2) a minimum of three operational searches adding a total of four more target exposures to the overall cert. At the minimum, this achieves 10 target exposures over 4 tests. Note: Explicit guidance on target numbers is appropriate for Section 6 (certifications), but is not in Section 5 (per my comment #28).	Alter Table 1 such that each discipline is required to conduct: (1) one 6-target odor recognition assessment and (2) a minimum of three operational searches adding a total of four more target exposures to the overall certification.	Reject: The requirements were determined by reviewing multiple national certification bodies' guidelines/rules. Odor recognition assessments are not required for all organizations. If a certification meets only the base minimum (6 mandatory odors and 4 mandatory assessments), then the math stated in the comment is correct and it becomes an "all or nothing" certification. There is no limit to adding additional assessment areas and increasing the number of searchable items/areas within each assessment.
432	6.5.1.2	6.5.1.2	E	Delete, repetitive in 5.7.1.1.2		Reject: While repetitive, the information is of sufficient importance that it should be stated in this section as well.
433	6.5.1.2 NOTE	6.5.1.2 NOTE	E	Delete, repetitive in 5.7.1.1.2 NOTE		Reject: While repetitive, the information is of sufficient importance that it should be stated in this section as well.
197	6.5.1.2	6.5.1.2	T	In regards to "At least 1 g of the explosive compound be used during testing and not "trace" amounts.	see comment on 5.7.1.1.2	Reject: While repetitive, the information is of sufficient importance that it should be stated in this section as well. Clarification was added in section 4.2.1.5 and 6.5.2 that actual explosives shall be used for imprinting and certification. Clarification was added to section 7.1 note for the acceptable uses for non-detonable or non-hazardous training.
198	6.5.1.2	6.5.1.2	T	In regards to the "NOTE"	see comment on 5.7.1.1.2	Reject: While repetitive, the information is of sufficient importance that it should be stated in this section as well. This note responds to guidance regarding the US/S.I. units that follow ASB's procedures.
13	6.5.2	6.5.2	T	AN should be listed as a primary odor and not an optional odor. This is based on it's availability to the public and the history of it being used in terrorist attacks such as the OKC Bombing. Along with other data that shows AN is a primary explosive of choice amongst terrorist groups domestically and abroad.	Add AN to the mandatory list of target odors.	Accept with modification: One type of ammonium nitrate remains in 4.2.1.6 as based on historical use.
199	6.5.2	6.5.2	T	in regards to items a - f	see comments and corrections made in 4.2.1.5	Accept with modification: See comment resolutions for comment #99, 270, 406, 349, 350, 331, 100, 101, 102, 103.
382	6.5.2 & 6.5.3	6.5.2 & 6.5.3	T	As noted in comments #15 and #16 above, I believe the standard (and the community) would benefit from changes to the list of mandatory and optional target materials.	Enact suggestions provided in comments #15 and #16 ({1} Make single base smokeless powder a mandatory material, and double base smokeless powder an additional/optional material. {2} Make ammonium nitrate a mandatory material.) and sync the lists in 6.5.2 and 6.5.3 with that change.	Accept with modification: See comment resolutions for comment #99, 270, 406, 349, 350, 331, 100, 101, 102, 103.
312	5.5.3 e)	6.5.3 e)	T	Add other notable I.E. peroxides	…(TATP), Hydrogen Peroxide/Fuel Mixtures, Urea hydrogen peroxide]	Reject: It is not best practice to train canines on odors associated with common household items. This will lead to nuisance (false) alarms. HPOM mixtures are known to be chemically unstable and unpredictable.
313	5.5.3 i)	6.5.3 i)	T	See comment #11	See comment #11	Reject: Nitromethane (NM) is a high explosive capable of detonating.
200	6.5.3	6.5.3	T	in regards to items b - f	see comments made in 4.2.1.6	Accept with modification: See comment resolutions for comment#349, 350, 331, 39, 50, 104, 105, 106, 107, 108, 109, 271, 110, 272, 273
201	6.5.3	6.5.3	T	In regards to the paragraph starting, "Due to the extreme instability…"	see comment on 4.2.1.6 regarding this same content/paragraph	Accept with modification: See comment resolutions for comment#349, 350, 331, 39, 50, 104, 105, 106, 107, 108, 109, 271, 110, 272, 273

#	Section (original comment)	Updated section for this comment	Type of Comment (E	Comments	Proposed Resolution	Final Resolutions
314	6.5.4	6.5.4	T	S.I. units are required	1 ft = 0.305 m	Reject: Section 6.5.4 a was deleted because this information is provided in section 5.
202	6.5.4 & 6.5.5	6.5.4 & 6.5.5	T	poorly worded and can be misinterpreted - it's not the maximum height and depth of target odor but the height and depth of the hide	change both to: "Target odor shall be concealed no higher than 8 feet and no deeper than 1 foot."	Reject: Sections 6.5.4 and 6.5.5 were deleted because this information is provided in section 5 because the height and depth vary between assessments.
315	6.5.5	6.5.5	T	S.I. units are required	1 ft = 0.305 m	Reject: Section 6.5.5 was deleted because this information is provided in section 5.
203	6.5.7	6.5.4	E	Replace "by" with "to"	Replace "by" with "to"	Accept
434	6.5.7	6.5.4	E	Delete, repetitive in 5.8.1.2.16 and 5.8.1.2.16.1		Reject: While repetitive, the information is of sufficient importance that it should be stated in this section as well.
435	6.5.8	6.5.5	E	too expensive to have two sets of explosives in an organization to maintain certification training aids and training aids.	delete 6.5.5 Target odor(s) used in the certification process should not have been used in the day-to-day training activities of the team being certified.	Reject: This is a recommendation and not a requirement therefore the use of word "should". However this is the best practice. "Day-to-day" was replaced with "(maintenance training, periodic proficiency assessments, double-blind assessment, etc.)".
393	6.5.8	6.5.5	T	States that target odor(s) used in the certification process should not have been used in the day to day training activities of the team being certified	This section needs clarity as to who provides the explosive materials during the proposed certfification process	Reject: The organization completing the certification shall determine who is responsible for providing the explosives. This is a recommendation and not a requirement therefore the use of word "should". However this is the best practice. "Day-to-day" was replaced with "(maintenance training, periodic proficiency assessments, double-blind assessment, etc.)".
204	6.6	6.6	T	How would this work? Unless teams are trained on variable schedule reward [i.e., less than 100% reward], then the handler needs to know whether or not to reward his/her dog when it indicates. Who communicates this information to the handler if the certifying official is also "blind"? Regardless of whether the canine is trained on a variable reward schedule, a handler would still need to know whether or not to correct his/her dog if it had a "false alert" or NPR.	Delete the sentence "At least one certification component should be a double-blind assessment."	Reject: This is a recommendation and not a requirement therefore the use of word "should". Double-blind assessments are necessary as an objective "check" on the canine team to remove the possibility of inadvertent cueing. Additionally, double-blind assessments are the closest to the canine's operational environment as you rarely know the nature of an alert in the field.
205	6.6	6.6	E	Related to above edit, delete "components that are not double-blind" add words "run as"	Delete "components that are not double-blind" add "run as" so that the sentence reads "Certification shall be run as single-blind assessments."	Reject: This is a recommendation and not a requirement therefore the use of word "should". Double-blind assessments are necessary as an objective "check" on the canine team to remove the possibility of inadvertent cueing. Additionally, double-blind assessments are the closest to the canine's operational environment as you rarely know the nature of an alert in the field.
206	6.7	6.7	T	in regards to "an overall false alert rate not to exceed 10%" How would this be calculated in an operational building search, where there are many items to search aside from any distracters or controls deliberately placed into the search scenario?	Specify that 10% refer to intentionally placed distractors and that no more than 2 total NPRs in all search areas are allowed.	Reject: ANSI/ASB Standard 088 provides examples and the means to calculate this value.
209	6.7	6.7	T	In regards to "...without disturbing the target odor(s)..." this would not apply in an ORT since contact with source [the box or tin or container, not the actual training aid] is inevitable	specify that this does not apply to ORT	Reject: The statement is accurate as written. The canine should not be disturbing the training aids for safety purposes.
316	6.7	6.7	E	Paragraph below entry should be a NOTE:	Add word NOTE:	Reject: This list follows ASB's style. This sentence cannot be a note, because it contains a requirement.
317	6.7	6.7	T	S.I. units are required	1 ft = 0.305 m; So in this instance it is 1 m	Accept
383	6.7	6.7	T	Additional clarity needed with regards to the false alert rate, particularly for the PSC elements	Change text to read: "For successful certification, the canine team shall achieve an overall positive alert rate of at least 90%. Additionally, as defined and calculated in ANSI/ASB Standard 088, false alerts shall not exceed 10% when aggregated across those searches involving distinct objects (e.g., scent boxes; baggage/parcels; vehicles) AND also cannot exceed more than 1 false per continuous searchable area (e.g., building/room; open area; choke point; crowd; line/queue).	Reject: the statement is accurate as written. ANSI/ASB Standard 088 provides examples and the means to calculate this value.
207	pg. 25 footnote e	pg. 25 footnote e	E	The same footnote should not appear multiple times with different reference letters - reference previous footnote.	Reference previous footnote.	Accept
208	pg. 25 footnote e	pg. 25 footnote e	T	See previous comment on pg. 11/12 footnote b regarding this content	see comment 55, line 67: (It seems more appropriate to cite the international agreement since this citation implies that plastic explosives manufactured in another country would not contain taggants. Cite international agreement)	Reject: Although this footnote was deleted. Comment #111 (excel line #124) was accepted and it is reflected in footnote b.
318	6.8 a)	6.8 a)	E	What is meant by positive control?	Better said: ...maintaining behavioral control...	Reject: The statement is accurate and taken from the already published ANSI/ASB Standard 088.
319	6.13	6.13	E	Better to refer to this Standard	...enhance this standard to...	Reject: The statement is accurate and taken from the already published ANSI/ASB Standard 088.
320	7.1 i)	7.1 i)	T	S.I. units are required	Change to ...0.11 Kg (1/4 lb.). Or it could be 0.1 Kg (1/4 lb.).	Accept

#	Section (original comment)	Updated section for this comment	Type of Comment (E	Comments	Proposed Resolution	Final Resolutions
37	7.3	7.4		<u>Canine teams shall complete 16 hours of training per month.</u> While 16 hours in a month does not seem like much, operational and external factors would make this almost impossible. If a team works 5 days a week, that is 48 minutes of training a day. This does not take in to account actual calls for service, extended duties with the canine, breaks, other administrative duties, time off, injured canines, etc. Also, if a canine unit had only 8 teams, it would take 8 hours to run all the teams through the training scenario. If you tried to run multiple scenarios in a day, it would take even longer. This is an example of a team working 5 days a week and getting to train each day. If a team took off or other operational deployments happened, the training time per day increases. After a while you are doing extended searches just to make your time and not to maintain proficiency. Rather than setting minutes per month, it could be areas per month; such as 4 bag searches a month, 4 vehicle searches per month, etc. You could also add in 2 extended searches of 45 minutes or more, or various combinations without relying on a 16-hour flat training cycle.		Reject: A minimum of sixteen hours of training per month is a standard amongst the law enforcement and professional canine communities. The time can be split as allowable by the operational tempo of the canine team.
210	8.1	8.1	T	Replace "odor/scent" with "cross-" it's not just odor but also physical contamination of the TAs, both from use [environmental contamination] and improper handling and storage	Replace "odor/scent" with "cross-"	Reject with modification: The term contamination is encompassing of cross-contamination and physical contamination. However this section was edited for clarity.
211	8.1.1	8.1.1	E	Replace "local" with "locally"	Replace "local" with "locally"	Accept
212	8.1.3.2	8.1.3.2	E	add commas	Add commas so that the sentence reads, " …shall contain, but not be limited to, the following:"	Accept
213	8.1.4.1	8.1.4.1	T	what's the difference between bulk explosives and training aids? Even a 1/4-lb TA is considered "bulk" in that it can be detonated and can cause substantial damage.	Change "…bulk explosives and training aids." to "…demolition explosives and canine training aids."	Reject with modification: This section was updated for clarity and the commented word choice was deleted.
214	8.1.4.2	8.1.4.2	T		Add sentence to the end of paragraph that states, "In addition, it is recommended to replace the outer, plastic bag in which training aids are stored once every 3 to 6 months."	Reject: There is no publically available peer reviewed scientific literature supporting this statement. Additionally, not all training aids are kept in plastic bags. The configuration of the training aid is not mandatory and therefore the packaging and replacement schedule is left to the organization to determine.
321	8.1.4.2	8.1.4.2	T	Sealed containers are required for explosives with very volatile components. Ask Katylynn.	Add: …separately in sealed containers in…	Accept
215	8.1.5	8.1.5	T	Same comment as 8.1	Replace "odor/scent" with "cross-"	Reject: The term contamination is encompassing of cross-contamination and physical contamination.
216	8.1.5	8.1.5	T	In regards to the NOTE that states "The *standard* is to replace training aids …" Whose standard?	Change "The standard is…" to "It is recommended…"	Accept with Modification: The note was edited to read "Typically, training aids are replaced on an annual basis."
436	8.1.5	8.1.5	E	too costly	NOTE Recommend replacing training aids every two years.	Reject with modification: "Typically, training aids are replaced on an annual basis." This statement is note that does not contain a requirement or a recommendation. There is no publically available peer reviewed scientific literature supporting the ideal replacement schedule since most organizations are not regularly testing their training aids for contamination.
323	8.1.5 NOTE:	8.1.5 NOTE:	E	What is with this "The standard is? This is the standard.	Reword: Replace training aids on a maximum of an annual basis.	Accept with Modification: The note was edited to read "Typically, training aids are replaced on an annual basis."
384	8.2	8.2	T	I'm not sure this stance/statement can be backed by science, but if retained, it should be revised to add clarity and be inclusive of oxidizers, propellants, etc.	Change text to: "Every effort shall be made to train on the authentic/actual targeted materials (i.e., where feasible, avoid use of pseudos, simulants, and surrogates).	Accept with Modification: This section was modified for clarity.
385	8.2.1	8.2.1	T	Correct the misrepresentation of concomitant ingredients like sugar as a "distractor".	Add the term "control" to the list of definitions (#12 above) and change the end of 4.2.1.9 to "…shall be used as controls." (i.e., swap "control" for "distractor")	Reject: Sections 8.2.1, 8.2.1.1 and 8.2.1.2 were deleted based on another comment that prompted the deletion of similar sections in Section 4 - see comment #49/excel line 131.

#	Section (original comment)	Updated section for this comment	Type of Comment (E...	Comments	Proposed Resolution	Final Resolutions
45	8.2.1.	8.2.1.		"If IEs are included in the canine's training, then the non-explosive precursor materials used to manufacture the trained IEs (e.g., sugar, acetone, etc.) shall be used as distractors." I am not an expert on any of this but I am not sure this is exactly what we want to do and might need to be tailored specifically for each improvised explosive. I would rather have a false positive alert than no alert on a positive device. For example, TATP is made with acetone and peroxide and HMTD with hexamine and peroxide (with both using an acid as a catalyst). The chemistry of the reaction creates new monomolecular explosives (TATP and HMTD) with distinctive odors that are nothing like acetone or peroxide. While I would never want to use peroxide as a distractor (potential explosive), I doubt the acetone is a good distractor and I am not sure that this volatile organic compound is good for the dog to strongly inhale. On the other hand, sugar would be perfectly acceptable as a distractor, but it might be more effective distractor if differing explosives mixtures were presented to the dog so that he knows what they smell like together; i.e. icing sugar/AN, Aluminum/AN, Nitromethane/AN, Diesel/AN etc. (as discussed in the paper above).		Accept: Sections 8.2.1, 8.2.1.1 and 8.2.1.2 were deleted based on another comment that prompted the deletion of similar sections in Section 4 - see comment #49/excel line 131.
46	8.2.1.1	8.2.1.1		Precursor distractor materials shall be stored in separate, individual, and labeled containers in a manner safe for the handler and canine. The containers actually become the most important distractors. The reason many dogs cannot detect PETN alone is that they originally imprinted on the detcord cording not the PETN. TATP and HMTD are loose crystalline solids and need a container to present the odor. It is critical to offer empty containers as distractors to ensure that the dogs don't imprint on the container.		Reject: Sections 8.2.1, 8.2.1.1 and 8.2.1.2 were deleted based on another comment that prompted the deletion of similar sections in Section 4 - see comment #49/excel line 131.
322	8.2.1.1	8.2.1.1	E	This is in the wrong place and should follow 8.1.4.2	Move	Reject: Sections 8.2.1, 8.2.1.1 and 8.2.1.2 were deleted based on another comment that prompted the deletion of similar sections in Section 4 - see comment #49/excel line 131.
386	8.2.1.1 & 8.2.1.2	8.2.1.1 & 8.2.1.2	T	"precursor distractor" is a confusing and misrepresenting descriptor	Replace "precursor distractor" with "non-targets"	Reject: Sections 8.2.1, 8.2.1.1 and 8.2.1.2 were deleted based on another comment that prompted the deletion of similar sections in Section 4 - see comment #49/excel line 131.
217	8.2.1.2	8.2.1.2	T	Same comment as 8.1	Replace "odor/scent" with "cross-"	Reject: Sections 8.2.1, 8.2.1.1 and 8.2.1.2 were deleted based on another comment that prompted the deletion of similar sections in Section 4 - see comment #49/excel line 131.
437	8.4.2	8.4.2	E	Not practicable. Many handlers are not located with other handlers.	Training aids should be signed in and out by the canine handler.	Reject: This is a best practice recommendation and not a requirement and it should remain as written.
324	8.5	8.5	E	Documented by whom?	Add: Anyone handling the explosives should have documented training…	Accept
218	8.6	8.6	T	How to teams/agencies verify the reliability of the source/vendor? What are the criteria?	add criteria that teams can use to assess reliability of TA source/vendor	Reject with Modification: This section was edited for clarity.
219	8.7	8.7	T	Delete "/non-explosive precursor" - why would one need SDS for sugar?	Delete "/non-explosive precursor"	Accept
220	9.2	9.2	E	missing word	Add "in" so that it reads, "… records may be combined or in separate documents."	Reject: This statement is accurate and this is an unnecessary grammatical change.
387	9.5	9.5	T	Missing details on non-targets	Add a bullet that states: "Type and placement of non-targets used."	Reject: Each organization decides about the documentation of additional distractors. This requirement falls within section 9.5 p).
439	9.5 f	9.5 f	E	What is the purpose of the "size" of search area?	Type of search area (e.g., vehicle, baggage/parcels, building, open area, etc.).	Reject: The size of the search is a necessary descriptor (e.g., type: vehicles; size: ten sedans; type: open area; size: 50K square feet).
438	9.5 and 9.6	9.5 and 9.6	E	Both sections mirror each other. The certification records should reflect who, what, where, when, and the certification authority.	The Assessment Record with all the pertinent information could be an attachment to the certification document.	Reject: Assessments and certifications are already defined in the published TR 025 and Std 088. Certifications are a formal activity where multiple assessments are conducted culminating in the certification itself. However, assessment can also be singular and can be completed as part of training and/or proficiency testing. The redundancy is necessary as section 9.5 and 9.6 would be two separate events.
388	9.6	9.6	T	Missing details on non-targets	Add a bullet that states: "Type and placement of non-targets used."	Reject: Each organization decides about the documentation of additional distractors. This requirement falls within section 9.6 q).
389	9.7	9.7	T	Missing details on non-targets	Add a bullet that states: "Type and placement of non-targets used."	Reject: Each organization decides about the documentation of additional distractors. This requirement falls within section 9.7 p).
221	9.10	9.10	E	replace "." with ":"	replace "." with ":" so that it reads, "… the following:"	Reject: The statement is accurate and this is an unnecessary grammatical change based on ASB's style guidance.

#	Section (original comment)	Updated section for this comment	Type of Comment (E	Comments	Proposed Resolution	Final Resolutions
222	9.11	9.11	T	agreed, but how does this fit under the topic of NPR being relevant for investigative purpose?	explain relevance	Reject: Section 9.11 is an independent subsection of 9 and does not fall within section 9.10.
223	9.13	9.13	T	In regards to "false negatives" this is an unknown for deployment records - can't know what was missed unless a bomb goes off	Delete "false negatives" or add clarification that "false negatives" only apply to training and assessment records and not to operational results.	Reject: This statement is under " Canine team records and documentation Management," and applies to all records management which includes training, assessments, certifications, and deployments. While evidence of a false negative is easy to determine in non-deployment scenarios, there are instances, although unlikely, where a false negative could be determined in deployment scenarios that must be captured (e.g. the PSC team screens a person and their bag and does not alert, an x-ray of the bag later reveals an explosive).
224	Annex A	Annex A	E	Replace "/" in second paragraph with "or that" and add a semicolon	Replace "/" in second paragraph with "or that" and add ";" so that the sentence reads, "…formulations on the market or that can be made; however many…"	Accept
225	Annex A	Annex A	T	first (e.g.,) in the second paragraph Cast booster should never be selected to represent an explosive in the PETN category in the first place. TNT has a vapor pressure orders of magnitude higher than PETN and will dominate in the headspace/vapor phase, making cast booster not a good choice to represent PETN.	Cast Boosters should be placed under optional list and not mandatory list	Accept with modification: Cast boosters were removed as an example from the mandatory list.
226	Annex A	Annex A	E	Add "," and "SDS'" to clarify	Add "," and "SDS'" so that it reads, "… required to maintain SDS' for the products they sell, and SDS' can be requested directly…"	Accept
227	Annex A	Annex A	E	Replace "canine's" with "canine team's"	Replace "canine's" with "canine team's" so that the sentence reads, "… based on the intelligence-based threat in the canine team's intended operational area…"	Accept: Also intelligence-based was replaced by intelligence-driven.
27	Table A.1	Table A.1	T	No Primasheet listed	Add Primasheet 2000	Accept: Added to RDX (plastic examples).
55	table A.1	table A.1	t	Black MZ is a black powder substitute (contains potassium nitrate, potassium perchlorate, and ascorbic acid) - it is currently listed as an example for black powder. It is also no longer being manufactured (not sure if you are including discontinued products)	Move to table A.2 (or remove since it is discontinued)	Accept with modification: Moved to Optional Category table under Black powder substitutes. Please note that it is still available for purchase.
325	Table A.1	Table A.1	T	Should add HMX. HMX can be 10% of combined RDX+HMX in C-4, probably as a side product.	Add: Cyclotetramethylenetetraamine (HMX) below RDX and its occurrence in Plastic	Reject: HMX is included in the Optional Category table.
326	Table A.1	Table A.1	T	There are multiple names for RDX. Wikipedia lists many but not the one in this document	Add Cyclotrimethylenetrinitramine as an alternate name for RDX	Accept
228	pg. 34 footnote d	pg. 35 footnote d	E	remove comma after the word "only"	remove comma after the word "only"	Accept: This note was updated as well.
240	pg. 38 footnote f	pg. 38 footnote f	E	remove comma after the word "only"	remove comma after the word "only"	Accept: This note was updated as well.
229	pg. 35 table	pg. 38 table	T	didn't go through this list in detail - assuming it's correct		Reject: No resolution offered.
230	pg. 36 table	pg. 39 table	T	In regards to "Pure PETN" "Wetted" = phlegmatized with water = NOT pure - see comment below	delete "wetted"	Reject: From a chemical standpoint, wetted with water does not add odor to the scent picture and is there for acceptable as "pure".
231	pg. 36 table	pg. 39 table	E	Spelling of "Primaline"	remove the first "e"	Accept
232	pg. 36 table	pg. 39 table	E	In regards to "Other" spelling of "Phlegmatized" does not have an additional "e"	remove the first "e"	Accept
233	pg. 36 table	pg. 39 table	T	In regards to "Other - Phlegmatized" Phlegmatized with what? The term simply refers to explosive that has a desensitizer additive, which would include water. So if water is a phlegmatizing additive, how can "wetted" explosive be considered "pure"?	Give example of phegmatized PETN explosive: wax-coated PETN or PETN-TNT booster charges, where TNT is the phlegmatizing explosives	Accept with Modification: Phlegmatizing agents have been clarified.
234	pg. 36 table	pg. 37 table	E	…cyclohexane [missing 2nd "c"]	Add a "c" so that it reads "triazacyclohexane"	Accept with modification: Cyclotrimethylene-trinitramine (RDX)-based is the term used now
235	pg. 36 table	pg. 37 table	T	In regards to "A-5 Pellets" A-5 is NOT "pure" RDX - it has 1.5 % stearic acid coating used as a desensitizer.	Delete A-5 from "pure RDX" list	Accept

#	Section (original comment)	Updated section for this comment	Type of Comment (E/T...)	Comments	Proposed Resolution	Final Resolutions
236	pg. 37 table	pg. 37 table	T	In regards to "RDX, Plastic" bullets "Composition B, Compositions A3, Compositions A4, Compositions A5" None of these falls under "plastic" explosive classification and would not, therefore, be tagged. Comp B is a TNT-RDX cast explosive. The various A compositions are granular RDX coated in wax or stearic acid. If these were "plastic explosives" as cataloged here, then per 18 USC 842, they would have to contain taggant. Furthermore, A5 is listed here as an RDX-based "plastic explosive" but is listed above under A5 pellet as "pure RDX."	Delete Comp B, A3, A4, A5 from Plastic Explosive list - all should be placed under optional list for RDX [comp B may also be listed as optional for TNT]	Accept with modification: Composition B, A3, A4, and A5 were moved to the other category
237	pg. 37 table	pg. 37 table	E	...cyclohexane [missing 2nd "c"]	Add a "c" so that it reads "triazacyclohexane"	Accept with modification: Cyclotrimethylene-trinitramine (RDX)-based is the term used now.
56	table A.2	table A.2	t	Blue MZ is only available in pellet form	Remove Blue MZ	Accept
327	Table A.2	Table A.2	T	Addional peroxides should be identified.	Add to the bullet list: urea hydrogen peroxide and hydrogen peroxide/fuel mixtures	Reject: Not added because not enough material exist to recommend training with this mixture.
238	pg. 38 table	pg. 35 table	E	Correct spelling of "Kinepak"	remove the "c" from the word	Accept
239	pg. 38 table	pg. 35 table	T	It's necessary to specify not only unmixed but also the solid component only. Otherwise, it could be misunderstood that both components [AN and NM] be used, in which case, it's no longer "pure AN."	Add text so that it reads, ""(unmixed, solid component only)"	Accept
251	pg. 39 footnote g	pg. 41 footnote f	E/T	see previous comment on p.12 on this same paragraph	see comment 57, line 69	Reject: Clarification was added in section 4.2.1.5 and 6.5.2 that actual explosives shall be used for imprinting and certification. Non-detonable or non-hazardous type materials mimicking actual IE shall not be used for initial training. Therefore the statement is accurate.
241	pg. 39 table	pg. 40 table	E	To be consistent with the rest of the list, this [Emuline] should have a registered trademark symbol.	Add registered trademark symbol after "Emuline"	Accept
242	pg. 39 table	pg. 40 table	T	In regards to "Blasting Agents, (non AN based) Why list the same explosive three times, three different ways?	List each only once, e.g., " NONA [Detotec]"	Reject: Per the SDS' these are listed under alternative names as separate explosives
243	pg. 39 table	pg. 41 table	E	In regards to "Improvised explosives, Salts, Chlorate based mixtures"	Add "-" after the word "Chlorate"	Reject: Only the oxidizer is listed. The statement is correct.
244	pg. 39 table	pg. 41 table	T	In regards to "Improvised explosives, Salts, Chlorate-based mixtures" These are oxidizers, not mixtures - is the intent to recommend training on the oxidizer alone or mixtures containing the listed oxidizers?	delete "mixtures" to read "Chlorate-based"	Reject: Only the oxidizer is listed. The statement is correct.
245	pg. 39 table	pg. 41 table	T	In regards to "Improvised explosives, Salts, Nitrate based mixtures" Only ANFO on this list qualifies as a "nitrate-based mixture" and even then only as an "ammonium nitrate-based mixture" as opposed to potassium nitrate or sodium nitrate mixtures such as black powder.	delete "mixtures" to read "Ammonium nitrate-based" need to add section for inorganic nitrates [potassium, sodium...]	Accept
246	pg. 39 table	pg. 41 table	T	In regards to "Improvised explosives, Salts, Nitrate based mixtures, Ammonium Nitrate" AN is not a mixture - it's only the oxidizer	see above comment 189, line 201	Accept
247	pg. 39 table	pg. 41 table	T	In regards to "Improvised explosives, Salts, Nitrate based mixtures, Aluminum Powder (ANAL)" aluminum powder is the fuel and certainly not ANAL -	change to "ANAL [ammonium nitrate-aluminum mixture]"	Accept
248	pg. 39 table	pg. 41 table	T	In regards to "Improvised explosives, Salts, Nitrate based mixtures, Urea Nitrate (UN)" UN is NOT a "nitrate-based mixture." It is a nitrate salt which has both fuel and oxidizer in one compound. It requires no additional fuel to become a detonable explosive.	delete urea nitrate from AN list and list separately [UN does not fall under AN or inorganic nitrate salts mixtures]	Accept
249	pg. 39 table	pg. 41 table	E	In regards to "Improvised explosives, Salts, Perchlorate based mixtures"	Add "-" after the word "Perchlorate"	Reject: Only the oxidizer is listed. The statement is correct.
250	pg. 39 table	pg. 41 table	T	In regards to "Improvised explosives, Salts, Perchlorate-based mixtures" These are oxidizers and not "mixtures."	delete "mixtures" to read "Perchlorate-based"	Reject: Only the oxidizer is listed. The statement is correct.
252	pg. 40 table	pg. 41 table	E	In regards to "Improvised explosives, Peroxide based explosives"	Add "-" after the word "Peroxide"	Accept
253	pg. 40 table	pg. 41 table	T	Recommend removing sulfates from this list as it can give canine handlers and trainers the wrong impression that they need to train on them. All pyrotechnic compositions will have nitrate, chlorate, and/or perchlorate as the main oxidizers, and teams are already training on these.	Delete "Barium Sulfate", "Sodium Sulfate" and "Strontium Sulfate"	Accept

#	Section (original comment)	Updated section for this comment	Type of Comment	Comments	Proposed Resolution	Final Resolutions
254	pg. 40 table	pg. 41 table	T	In regards to "Plastic explosives (untagged and tagged)" The same list should not appear twice, once under mandatory [Table A.1] and optional [Table A.2].	have separate and distinct lists for mandatory vs optional. Also see comment 180, line 192 on untagged and tagged	Reject: If plastic explosive were not selected as the mandatory source of RDX and/or PETN. Based on mission requirements, plastic explosives may still be an important training aid and that is why they are still included in the optional list and there is duplicity.
255	pg. 40 table	pg. 40 table	T	In regards to "Plastic explosives (untagged and tagged), RDX Based" bullets "Composition B, Compositions A3, Compositions A4, Compositions A5" None of these falls under "plastic" explosive classification and would not, therefore, be tagged. Comp B is a TNT-RDX cast explosive. The various A compositions are granular RDX coated in wax or stearic acid. If these were "plastic explosives" as cataloged here, then per 18 USC 842, they would have to contain taggant. Furthermore, A5 is listed here as an RDX-based "plastic explosive" but is listed in Table A.1 [under A5 pellet] as "pure RDX."	see comment 180, line 192	Accept with modification: Composition B, A3, A4, and A5 were moved to the other category
256	pg. 40 table	pg. 40 table	E	didn't go through this list in detail - assuming it's correct		Reject: No resolution offered.
257	Annex B	Annex B	T	In regards to the second sentence, I don't understand the intent. Where did 8-ft of 50gr/ft come from? How was it decided to use this as the "basis"? The table does not require starting from the stated basis since all listed lengths for each gr/ft are equivalent to each other in terms of the net amount of explosive contained within the lengths. Every length x gr/ft combination listed is equivalent to 25.9 grams [0.88 oz] net explosive content, an amount that is much smaller than typically used for other odors.	same as comment 78, line 90	Accept: Explanation added to Annex B.
258	Annex B	Annex B	T	In regards to the equation that starts, "Foot of Detonation Cord Required" This equation assumes that the "standard" is 1 ft of 400 gr/ft = 25.9 grams net explosive. Again, how was it decided that this is the "standard" against which calculations are made?	same as comment 78, line 90	Accept: Explanation added to Annex B.
259	Annex B	Annex B	E	In regards to equation that starts, "Pounds of Training aid material" The calculation gives net explosive content, which is different from "pounds of training aid material," which would weigh a lot more for Det Cord because of the tubing/casing.	replace "Training aid" with "net explosive"	Accept