

I have reviewed the draft standard that you have published and I believe the current draft should undergo significant revisions and be issued for an additional round of public consultation. There are requirements which are worded as recommendations and others which do not have measurable items. The use of footnotes makes the entire document difficult to follow as to what is required, especially with all the referenced best practice documents. If this is to be a true standard it should provide quantifiable measures in all requirements and limit the amount of external references.

You are welcome to publish my comments regarding this standard.