

	A	B	C	D	E
1	FAQ Number	Issue	Suggested Change	Committee Response	Accept/Reject/In Principle
2	2	<p>The edit proposed by the undisclosed Committee is addition of the words “or accepts.”</p> <p>The proposed new language can be misread to suggest that, by contrast, when IEEE-SA declines to accept a Letter of Assurance (hereinafter “LoA”), it has determined that the Patent Claim is not essential.</p> <p>The edit proposed by the undisclosed Committee has nothing to do with the newly introduced “June 13 2019” LoA form and appears aimed solely at revising the FAQs to the benefit of technology users and the detriment of patent holders.</p>	<p>Delete the proposed addition of the words “or accepts”</p> <p>Alternatively, if the addition of “or accepts” remains in the text, add the following edit:</p> <p>“When it requests, or accepts, or declines to accept, a Letter of Assurance, IEEE has made no determination of any Patent Claim’s essentiality”</p>	<p>Update first paragraph of answer to start:</p> <p>No. When it requests or accepts a Letter of Assurance, or returns a non-compliant form, IEEE has made no determination of any Patent Claim’s essentiality.</p>	I
3	2	<p>The edit proposed by the undisclosed Committee is addition of the sentence “It is the Submitter’s responsibility to determine whether it holds a potential Essential Patent Claim for an IEEE standard or project”.</p> <p>There is no established requirement on a patent holder to do anything. This new text adds a new unreasonably burdensome “responsibility” of the Submitter that is not grounded anywhere, let alone in IEEE-SA governance documents.</p> <p>The proposed text addition is also directly inconsistent with other parts of the IEEE-SA policy, including with:</p> <ul style="list-style-type: none"> · The fact that no patent search shall be required of Submitters. · The language of the LoA - both the 1 June 2019 and the 13 June 2019 LoAs state, under D.1: “The Submitter may own, control, or have the ability to license...” The “may” language is inconsistent with this newly proposed concrete “responsibility” <p>The edit proposed by the undisclosed Committee has nothing to do with the newly introduced “June 13 2019” LoA form and appears aimed solely at changing the FAQs to the benefit of technology users and the detriment of patent holders</p>	<p>Do not accept (delete) the proposed new sentence:</p> <p>“It is the Submitter’s responsibility to determine whether it holds a potential Essential Patent Claim for an IEEE standard or project”</p>	<p>Update last sentence of first paragraph to read:</p> <p>It is the Submitter’s responsibility to make a good faith effort to determine whether it holds a potential Essential Patent Claim for an IEEE standard or project, subject to the limitations on its obligations set out in section 6.2 of the IEEE-SA Standards Board By-Laws. (See questions 22 and 25.)</p>	I

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4	2	<p>The edit proposed by the undisclosed Committee is addition of the paragraph:</p> <p><i>“As stated in the IEEE-SA Standards Board Bylaws, IEEE is not responsible for (i) identifying Essential Patent Claims for which a license may be required; (ii) determining the validity, essentiality, or interpretation of Patent Claims; (iii) determining whether any licensing terms or conditions provided in connection with submission of a Letter of Assurance, if any, or in any licensing agreements are reasonable or non-discriminatory; or (iv) determining whether an implementation is a Compliant Implementation. “</i></p> <p>This newly proposed text has nothing to do with the question listed under FAQ #2.</p> <p>Furthermore, if this text is stated in the bylaws, what is the point in cutting and pasting the bylaws into the FAQs? The FAQs are not supposed to contain a mere recitation of the by-laws.</p> <p>The edit proposed by the undisclosed Committee has nothing to do with the newly introduced “June 13 2019” LoA form.</p>	<p>Do not accept, and hence delete, the proposed new sentence (deleted text is stricken):</p> <p>“As stated in the IEEE-SA Standards Board Bylaws, IEEE is not responsible for (i) identifying Essential Patent Claims for which a license may be required; (ii) determining the validity, essentiality, or interpretation of Patent Claims; (iii) determining whether any licensing terms or conditions provided in connection with submission of a Letter of Assurance, if any, or in any licensing agreements are reasonable or non-discriminatory; or (iv) determining whether an implementation is a Compliant Implementation. “</p>	<p>PatCom finds that the text is relevant to FAQ 2 because it fully describes IEEE's responsibilities. There are a number of other places where the FAQs cite text from the SASB Bylaws and Operations Manual.</p>	R
5	2	<p>The FAQ2 was modified to include or "accepting". However the FAQ is silent on the "refused" LOAs. It should be clarify that the same principle applies to refused LOAs.</p>	<p>Does the IEEE determine whether a patent is essential when requesting, or accepting or refusing a Letter of Assurance?</p> <p>No. When it requests, or accepts or refuses a Letter of Assurance, the IEEE has made no determination of any Patent Claim's essentiality. It is the Submitter's responsibility to determine whether it holds a potential Essential Patent Claim for an IEEE standard or project.</p>	<p>Update first paragraph of answer to start:</p> <p>No. When it requests or accepts a Letter of Assurance, or returns a non-compliant form, IEEE has made no determination of any Patent Claim's essentiality.</p>	I
6	2	<p>The new draft sentence at the end of the first paragraph implies that there is a responsibility to do a patent search. This language should be tempered by the actual obligations set out in 6.2 of the Standards Board By-Laws, as well as by FAQs 22 and 25.</p>	<p>Add at the end of the last sentence of the first paragraph: "subject to the limitations on its obligations set out in section 6.2 of the IEEE-SA Standards Board By-Laws, and FAQs 22 and 25."</p>	<p>Update last sentence of first paragraph to read:</p> <p>It is the Submitter's responsibility to make a good faith effort to determine whether it holds a potential Essential Patent Claim for an IEEE standard or project, subject to the limitations on its obligations set out in section 6.2 of the IEEE-SA Standards Board By-Laws. (See questions 22 and 25.)</p>	I

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31		<p>Since 2015, IEEE-SA has repeatedly declined to accept submitted LoA, often time refusing to provide an explanation for the decline.</p> <p>The newly introduced “13 June 2019” LoA, unlike the “1 June 2019” LoA, does not include a reciprocity “tick box”. Given IEEE-SA trend in recent years to reject LoAs that have attachments, there needs to be an IEEE SA assurance in the FAQs that Submitters of the “13 June 2019” form would be able to grant their assurance subject to reciprocity</p> <p>Without an assured path to providing RAND assurance subject to reciprocity, a patent holder may choose to give a negative LoA. As noted earlier, such result would conflict with the stated purpose for introducing the “13 June 2019” LoA, which was “to increase the number of [positive] statements of licensing assurance that are provided to IEEE in an acceptable format”</p> <p>(See https://development.standards.ieee.org/myproject/Public/mytools/mob/loa-13June2019limited-statement.pdf)</p> <p>The ability to make RAND assurance subject to reciprocity is key, because patentholders are often willing to give access to the technology, only in return for not being excluded themselves by the</p>	<p>“No. In submitting a Letter of Assurance, use of one of the two approved LOA forms is mandatory. (The following are not considered a modification: Completing the form is not considered a modification; attaching thereto materials clarifying the licensing terms, such as that the licensing assurance is subject to reciprocity, etc.) (See also question 85.)”</p>	<p>Both approved LOA forms allow for the attachment of Sample Licensing Terms when box D.1.a or D.1.b are checked. Those samples can include reciprocity terms.</p>	R
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8	85	While a term such as "reasonable rates" was not defined in the patent policy in effect prior to 15 March 2015, the term was explained under FAQ #39 in the FAQs in existence at the time. There may be other such instances. To make sure there is no confusion that terms used in policy and other governance documents in existence prior to 14 March 2015 are honored, the disclaimer language must reflect this.	Make the changes shown in red below: "Effective 13 June 2019, for projects (including amendments) or standards with a PAR approval date preceding the 15 March 2015 effective date of the updates to the text of the IEEE-SA Patent Policy, the custom LOA form dated 13 June 2019 – Limited may be submitted and, if accepted, the text of the IEEE-SA Patent Policy <u>and other governing documents, including the FAQs</u> , in effect on 14 March 2015 will apply. (See also questions 17F, 17G, 17H, and 84.)" It is further proposed that this same added language be included in the boxed text in the actual LoA-LIMITED form.	Update second paragraph of the answer to FAQ 85 to read: Effective 13 June 2019, for projects (including amendments) or standards with a PAR approval date preceding the 15 March 2015 effective date of the updates to the text of the IEEE-SA Patent Policy, the custom LOA form dated 13 June 2019 – Limited may be submitted and, if accepted, the text of the IEEE-SA Patent Policy in effect on 14 March 2015, as found in Clause 6 in the IEEE-SA Standards Board Bylaws and Clause 6.3 in the IEEE-SA Standards Board Operations Manual , will apply. (See also questions 15C, 17F, and 84.) (Note: add hotlinks to Bylaws and Ops Man words in above - https://development.standards.ieee.org/myproject/Public/mytools/mob/SASB-OpMan-Dec2014.pdf https://development.standards.ieee.org/myproject/Public/mytools/mob/SASB-Bylaws-Dec2014.pdf) FAQs are not normative text.	
9	85	See discussion and comments above re FAQ 17G	Revise the FAQ sentence as follows (new text is in red font, deleted text is stricken through): "Effective 13 June 2019, for projects (including amendments) or standards with a PAR approval date preceding the 15 March 2015 effective date of the updates changes to the text of the IEEE-SA Patent Policy, including editions, revisions, and amendments that existed as of the approval date of said projects or standards or at any time after that date, the custom LOA form dated 13 June 2019 – Limited may be submitted and, if accepted, the text of the IEEE-SA Patent Policy, FAQs interpreting that Patent Policy, and pertinent governance documents in effect on 14 March 2015 will apply. The 14 March 2015 policy documents are available at www.public_links_to_14-March-2015_documents.com . (See also questions 17F, 17G, 17H, and 84.)" The URL at the end of the suggested "fix" is provided as an example for its potential formulation.	Update second paragraph of the answer to FAQ 85 to read: Effective 13 June 2019, for projects (including amendments) or standards with a PAR approval date preceding the 15 March 2015 effective date of the updates to the text of the IEEE-SA Patent Policy, the custom LOA form dated 13 June 2019 – Limited may be submitted and, if accepted, the text of the IEEE-SA Patent Policy in effect on 14 March 2015, as found in Clause 6 in the IEEE-SA Standards Board Bylaws and Clause 6.3 in the IEEE-SA Standards Board Operations Manual , will apply. (See also questions 15C, 17F, and 84.) (Note: add hotlinks to Bylaws and Ops Man words in above - https://development.standards.ieee.org/myproject/Public/mytools/mob/SASB-OpMan-Dec2014.pdf https://development.standards.ieee.org/myproject/Public/mytools/mob/SASB-Bylaws-Dec2014.pdf)	

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10	85	the text of the patent policy in effect on March 14, and other IEEE related governing documents (standard board bylaws, Standards Board Operations Manual, IEEE-SA Operation Manual) should be easily accessible on the IEEE website as well as linked in the FAQ and in the custom LOA form dated 13 June 2019	Effective 13 June 2019, for projects (including amendments) or standards with a PAR approval date preceding the 15 March 2015 effective date of the updates to the text of the IEEE-SA Patent Policy, the custom LOA form dated 13 June 2019 – Limited may be submitted and, if accepted, the text of the IEEE-SA Patent Policy, of the standard board bylaws, standard board operations manual and IEEE-SA Operation Manual in effect on 14 March 2015 will apply. (See also questions 17F, 17G, 17H, and 84.) Add link to: - IEEE patent policy, standard board bylaw, Standards Board Operations Manual, IEEE-SA Operation Manual dated 14 march 2015 Add the same links in the custom LOA form dated June 13 2019: The IEEE Patent Policy and the procedures in effect on 14 march 2015 used to execute that policy are documented in the IEEE-SA Standards Board Bylaws and the IEEE-SA Standards Board Operations Manual in effect on 14 march 2015, available at http://standards.ieee.org/resources/xxxxxs . The terms and definitions set forth in the IEEE Patent Policy, IEEE-SA Standards Board Bylaws, and IEEE-SA Standards Board Operations Manual in effect as of 14 march 2015 are incorporated herein.	Update second paragraph of the answer to FAQ 85 to read: Effective 13 June 2019, for projects (including amendments) or standards with a PAR approval date preceding the 15 March 2015 effective date of the updates to the text of the IEEE-SA Patent Policy, the custom LOA form dated 13 June 2019 – Limited may be submitted and, if accepted, the text of the IEEE-SA Patent Policy in effect on 14 March 2015, as found in Clause 6 in the IEEE-SA Standards Board Bylaws and Clause 6.3 in the IEEE-SA Standards Board Operations Manual , will apply. (See also questions 15C, 17F, and 84.) (Note: add hotlinks to Bylaws and Ops Man words in above - https://development.standards.ieee.org/myproject/Public/mytools/mob/SASB-OpMan-Dec2014.pdf https://development.standards.ieee.org/myproject/Public/mytools/mob/SASB-Bylaws-Dec2014.pdf)	I
11	85	(third para) To the extent there were any amendments or additions after 14 March 2015 to the terms, definitions or policies of the IEEE-SA Patent Policy, FAQs, IEEE-SA Standards Board By-Laws, and IEEE-SA Standards Board Operations Manual that conflict or are otherwise inconsistent with the policy, etc. in effect on 14 March 2015, , it should be explicitly stated that the policies, etc. on 14 March 2015 will take precedence.	Add at the end of that paragraph the following: "For clarity, to the extent that any terms, definitions or policies of the IEEE-SA Patent Policy, FAQs, IEEE-SA Standards Board By-Laws and IEEE-SA Standards Board Operations Manual that were in effect after 14 March 2015 conflict with the terms, definitions or policies of such documents that were in effect on 14 March 2015, the terms, definitions or policies that were in effect on 14 March 2015 shall prevail."	Further explanation is not necessary because defined terms on the custom LOA form are as defined in the IEEE SA Patent Policy in effect on 14 March 2015.	R

	A	B	C	D	E
12	85	(third para) With regard to the custom LOA form dated 13 June 2019, in addition to the text of the IEEE-SA Patent Policy in effect on 14 March 2015, the other relevant terms, definitions and policies that also were in effect on 14 March 2015 -- such as the FAQs, IEEE-SA Standards Board By-Laws, and IEEE-SA Standards Board Operations Manual -- should also apply.	Insert after "IEEE-SA Patent Policy" and before "in effect on 14 March 2015" the following: "the FAQs, IEEE-SA Standards Board By-Laws, and IEEE-SA Standards Board Operations Manual" .	<p>Update second paragraph of the answer to FAQ 85 to read:</p> <p>Effective 13 June 2019, for projects (including amendments) or standards with a PAR approval date preceding the 15 March 2015 effective date of the updates to the text of the IEEE-SA Patent Policy, the custom LOA form dated 13 June 2019 – Limited may be submitted and, if accepted, the text of the IEEE-SA Patent Policy in effect on 14 March 2015, as found in Clause 6 in the IEEE-SA Standards Board Bylaws and Clause 6.3 in the IEEE-SA Standards Board Operations Manual, will apply. (See also questions 15C, 17F, and 84.)</p> <p>(Note: add hotlinks to Bylaws and Ops Man words in above - https://development.standards.ieee.org/myproject/Public/mytools/mob/SASB-OpMan-Dec2014.pdf https://development.standards.ieee.org/myproject/Public/mytools/mob/SASB-Bylaws-Dec2014.pdf)</p> <p>FAQs are not normative text.</p>	
13	0 (New FAQ)	the post 15 March 2015 IEEE policy includes the definition of specific terms (e.g. Reasonable Rate), which are capitalised in the post 15 March 2015 LOA form dated 1 June 2019. These terms are used in the custom LOA form dated 13 June 2019 without capitalisation as per the pre 15 March 2015 policy. However the disclaimer at the bottom of page 3 of the custom form does not make it clear which "policy and procedures" are in effect (e.g., the policies and procedures on "today's date?") while terms and definitions refer to the policies and procedures of 14 March 2015. This creates an ambiguity (which would be solved if the proposed changes in the second previous comment (on 85) is accepted) between the policy/procedures and the terms/definitions. There is not an FAQ clarifying the topic either.	<p>include the following text in a new FAQ xxx:</p> <p>Can the the custom LOA form dated 13 June 2019 be interpreted under the current IEEE policy and procedures while its terms and definions are the ones set forth in the IEEE patent policy, IEEE-SA standards board bylaws and IEEE-SA Standard BOord Operation manual in effect as of 14 March 2015?</p> <p>No, both the policy and procedures and the terms and definition on the custom LOA form dated 13 June 2019 correspond to the IEEE patent policy, IEEE-SA standards board bylaws and IEEE-SA Standard Board Operation manual in effect as of 14 March 2015.</p>	<p>New FAQ Number 15C: Which definitions are applicable to the custom LOA form dated 13 June 2019 – Limited?</p> <p>Defined terms on the "Limited" LOA form reference the IEEE SA Patent Policy in effect as of 14 March 2015 and are as defined there.</p>	

	A	B	C	D	E
14	17F	This FAQ describes "... a technology first included in IEEE 802.3bp and will apply to subsequent usage of that technology as described in question 17C." But 17C also states that this will occur "... only if the application of the technology required by the amendment has not changed from its previous usage." It is ambiguous as to whether the same LoA applies when this technology is used in a similar way in a different amendment (such as 802.bx hypothetically) that is also rolled up into the base standard.	We suggest clarification of intent that an LOA for one amendment will apply to other amendments rolled up into the same base standard when the same technology is used in the same way in both amendments.	This is covered in FAQ 14.	R
15	17F	<p>It has always been my understanding that when a Blanket LoA references a specific standard without further qualification (e.g., IEEE Std 802.3), an 'undated Blanket LoA', it provides assurance for all current and future amendments, revisions, and editions of the same standard (see FAQ 17A).</p> <p>It has also always been my understanding that when a Blanket LoA references a specific standard with further qualification (e.g., IEEE Std 802.3-2015), a 'dated Blanket LoA', it provides assurance only for the referenced standard/revision and subsequent application of its Essential Patent Claim(s) to the technology specified in another amendment, corrigendum, edition, or revision of the same IEEE Standard under the conditions specified in subclause 6.3.5 of the IEEE-SA Standards Board Operations Manual (see FAQ 14).</p> <p>The above was the basis for advice given to Submitters of LoAs on at least two occasions that I can recall while serving as IEEE-SA PatCom Chair. There may be other occurrences that I don't recall. In particular I believe that the use of the 'dated Blanket LoA' has been an important tool in some cases as the Submitter was willing to submit a blanket assurance for the current standard/revision at the time of submission of the LoA, but was not willing to provide a blanket assurance for future amendments, revisions</p>	Suggest that the first paragraph of the answer to FAQ 17F be changed to read 'Providing blanket assurance using the custom LOA form dated 13 June 2019 - Limited and identifying IEEE Std 802.3-2015 as the Standard/Project Number means that licensing assurance for all of the Submitter's Essential Patent Claims is being given for IEEE Std 802.3-2015 and all IEEE Std 802.3 editions, revisions, and amendments that exist at any time after that date, subject to IEEE-SA Standards Board Operations Manual 6.3.5. (See also question 14).'	<p>Change 17F to read: "IEEE 802 projects are often amendments to the existing standard (802.3, 802.11, etc.). How does providing blanket assurance using the custom LOA form dated 13 June 2019 – Limited identifying, for example, 802.3 apply to amendments with a PAR approval date after 15 March 2015? What if a specific amendment is listed?</p> <p>Providing blanket assurance using the custom LOA form dated 13 June 2019 – Limited and identifying IEEE 802.3 as the Standard/Project Number means that licensing assurance is being given for all 802.3 editions, revisions, and amendments that exist now or will ever exist in the future.</p> <p>Providing blanket assurance using the custom LOA form dated 13 June 2019 – Limited listing an amendment with a PAR approval date prior to 15 March 2015, such as 802.3bp, means that the licensing assurance is being given for a technology first included in 802.3bp and will apply to subsequent usage of that technology as described in question 17C. (See also questions 14, 17, 17A, 17B, 17D, and 85.)"</p>	I

	A	B	C	D	E
16	17F	(2nd para) Providing that a blanket licensing assurance applies to all future editions, revisions, and amendments to a standard risks a third party including a party's patented technology in a standard without their permission. If IEEE-SA wants to encourage companies to submit blanket LOAs under the Custom LOA form dated 13 June 2019, there needs to be a mechanism to allow companies to indicate that they are unwilling to license particular patents that may be essential to future editions, revisions or amendments to a standard, particularly where the patented technology was contributed by a third party without the permission or knowledge of the patent holder.	Add at the end of the second paragraph: ", unless the owner of a patent that contains an Essential Patent Claim that was contributed by a third party to a future edition, revision or amendment of a standard without the knowledge and consent of the patent owner submits a timely notice that it is not willing to license such patent claim on terms on terms consistent with the blanket licensing assurance."	This is unrelated to the FAQs supporting the custom LOA form dated 13 June 2019 – Limited and is therefore out of scope.	R
17	17F	(3rd para) It is unclear whether a blanket assurance listing an amendment would apply retroactively to the whole standard once the amendment is rolled into the standard	In the third paragraph, after "question 17C" insert "but will not apply to pre-existing provisions of the standard even after the amendment is rolled into the standard."	Addressed by changes made due to comment #15 and further clarified in FAQ 14.	I
18	17F, 17G and 17H	I would like to suggest that the references to IEEE Std 802-1985 in the new FAQs are changed to IEEE Std 802-2015. The reason for this is that I think that IEEE Std 802-2015 is a much better example. The PAR for IEEE Std 802-2015 was approved on 27th Oct 2014 < http://ieee802.org/3/bx/P802.3_PAR.pdf > and IEEE Std 802-2015 was approved as an IEEE-SA standard on 3rd September 2015. This, therefore, provides an example of a standard that is eligible as it was started before 15th March 2015 even though the standard itself was approved after that date.	Change references to IEEE Std 802-1985 to IEEE Std 802-2015.	Addressed by changes made due to comment #15.	I

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17G		<p>The preceding FAQ, 17F as revised by the undisclosed Committee, clearly states that “Providing blanket assurance using the custom LOA form dated 13 June 2019 – Limited [...] means that licensing assurance for all the Submitter’s Essential Patent Claims is being given for all [...] editions, revisions, and amendments that existed as of the approval date [...] or at any time after that date.”</p> <p>Therefore, treating amendment-specific LoAs and non-amendment-specific LoAs differently for the same base standard would discriminate between Submitters who decide, for business reasons or other reasons, to submit a blanket, non-amendment specific LoA, versus those Submitters who opt to take an amendment by amendment approach.</p> <p>The stated purpose for introducing the “13 June 2019” LoA was “to increase the number of [positive] statements of licensing assurance that are provided to IEEE in an acceptable format” (See https://development.standards.ieee.org/myproject/Public/mytools/mob/loa-13June2019limited-statement.pdf) (the term “[positive]” added as my understanding of the text – D.K).</p>	<p>Delete the proposed new text and, instead, have FAQ 17G read as follows (deleted text is stricken, new text is in red font):</p> <p>No. In this case, the appropriate form for the Submitter to use is the IEEE LOA form available at https://development.standards.ieee.org/myproject/Public/mytools/mob/loa.pdf. (See also question 85.)</p> <p>Yes, provided the project is an amendment to an existing IEEE Standard that (i) has not been classified as inactive by the IEEE-SA Standards Board; and (ii) was started before 15 March 2015. In that case, the Submitter may submit the custom LOA form dated 13 June 2019 – Limited and list the amendment to which it applies. Alternatively, the Submitter could choose to submit a Blanket LOA as described in question 17F.</p>	This FAQ has been removed.	R
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	A	B	C	D	E
20	17G	<p>Adopting the proposed FAQ 17G language as currently proposed by the undisclosed Committee will not meet this goal because Submitters may have solid reasons to refrain from submitting non-amendment specific LOAs including:</p> <p>(a) Lack of knowledge on how and to where a standard will develop in the future. Specific future amendments may aim to include proprietary technology that a company does not wish to contribute to the standard or give RAND assurance for;</p> <p>(b) The potential for a company A's technology to be submitted into a specific standard amendment by another Company B. without the technology owner's awareness, let alone consent;</p> <p>(c) Potential national security regulations or considerations;</p> <p>(d) Loss of trust in IEEE-SA governance and procedures given developments since 2013. Due process deficiencies included, but were not limited to, multiple changes to the patent policy in closed door "executive sessions" or by undisclosed groups, including the 13 June 2019 and 30 July 2019 LoA and FAQ changes subject of these comments. Given loss of trust, there is hesitation to provide such a "carte blanche" eternal assurance.</p>		No suggested change provided however this FAQ has been removed.	R
21	17G, 17H, 84A, 84B, generally	It has been extremely difficult to locate any past material, which is considered inappropriate given the referencing to past documents in the FAQ either expressly or impliedly, including the past policy, LOA and FAQ which are relevant to determining which LOA to use. To be able to reference past documents so is very important, in order that patent portfolios can be properly managed.	Rather than introducing a new LOA which in fact appears inconsistent with the LOA which was in place prior to the 15 March 2015 changes to the patent policy, simply adopting that LOA which was in place for the previous policy would remove inconsistencies introduced by the new Custom LOA 2019. This would also mean making the governing documents existing before 15 March 2015 should also be reinstated and accessible as well. A broader consultation process with IEEE stakeholders in the future, so as to ensure that any substantive changes to key governing documents, including the policy, FAQs and LOAs, are (i) workable, and (ii) do not disproportionately raise cost and effort to contribute to important standard development activity conducted by the IEEE.	Material referenced by the custom LOA form dated 13 June 2019 – Limited is available on the PatCom website.	R

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22	17G,17H	Would please provide clear definition for such as "Base standard, editions, revisions, and amendments"? In the long discussion of related policies, I found even IEEE veterans may have no idea what the differences are for these terms.		Thank you. We will forward your request to ProCom for future consideration. In addition, an email to patcom@ieee.org asking for a definition will be answered.	R
23	17H	The changed (fix) provided above in the row detailing my comment on FAQ 17G, renders part of the sentence unnecessary.	Revise the FAQ sentence as follows (new text is in red font, deleted text is stricken through): Yes. Since both the amendment PAR and the approved standard existed before 15 March 2015, The Submitter may use the custom LOA form dated 13 June 2019 – Limited and list either the base standard or the amendment. See questions 17B and 17D to understand the difference in the assurance being provided. (See also question 85.)	The request change to 17G was not made so the suggested deletion is not accepted. Note that FAQs 17G and 17H have been removed.	R
24	17H	<p>If, as suggested in the answer to FAQ 17H, a LoA were submitted for a base standard that existed as an approved IEEE standard prior to 15th March 2015, such as IEEE Std 802.3-2008 or IEEE Std 802.3-2012, as existing standards I believe subclause 6.3.5 of the IEEE-SA Standards Board Operations Manual in relation to 'An Accepted Letter of Assurance referencing an existing standard ...' would apply.</p> <p>I note that subclause 6.3.5 includes the text 'An Accepted Letter of Assurance referencing an existing standard ... will remain in force for the application of the Essential Patent Claim(s) to the technology specified in another amendment ... of the same IEEE Standard but only if (a) the application of the technology required by the amendment ... of the same IEEE Standard has not changed from its previous usage and (b) the same Essential Patent Claims covered by the prior Accepted Letter of Assurance remain Essential Patent Claims in the same IEEE Standard or revision thereof'.</p> <p>There would, therefore, appear to be cases where the LoA for a base standard would not apply for an amendment, for example, if the potentially essential patent claim related to technology that was not present in the base standard, only in the amendment. I agree that a submitter could submit a LoA for a potentially essential Patent Claim on the base standard to try to cover an amendment, and I agree that we will never check to see if, for example, the related technology in the amendment is in the base standard. But I believe that the rules in subclause 6.3.5 still determine if the LoA for the base standard actually applies to the technology in the amendment. I therefore don't think it is correct to state yes in answer to the question.</p> <p>I'm also not sure about the reference to FAQ 17B in the answer to FAQ 17H, since FAQ 17B relates to 'An LOA that references a specific standard (e.g., IEEE Std 802.3) without further qualification ...' that is an 'undated LoA', not a '... base standard that existed as an approved IEEE standard prior to 15 March 2015 ...' which would require the further qualification of a date (e.g., IEEE Std 802.3-2012), in other words a 'dated LoA'.</p>	I suggest that FAQ 17H be deleted, I believe that the relationship between LoAs for standards, amendments, corrigenda, editions, and revisions is already covered by the IEEE-SA Standards Board Operations Manual and FAQs, and I assume that the custom LOA form dated 13 June 2019 - Limited is not changing that relationship.	Agree	A

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25	17I (to be added)	The issue of potential conflicts between definitions in the custom LoA form dated 13 June 2019 ("Custom LoA Form") and those in the 2015 policy is very relevant in light of the wide use that could be made of the Custom LoA Form, but it has not been addressed by the drafting committee at PatCom. In the new custom LOA it is noted at the bottom of page 4 that the definitions contained in the old policy shall control in case of discrepancy between the definitions in the form and those in the new 2015 policy ("Should any discrepancy exist between the definitions above and the definitions in the IEEE-SA Standards Board Bylaws clause 6.1, the definitions contained in the Bylaws in effect as of 14 March 2015 shall control"). However, new definitions have been introduced by the new 2015 policy ("compliant implementation", "prohibitive order", "reciprocal licensing", "reasonable rates") and their application to the Custom LoA Form has not been clearly ruled out. In order to address this issue, it is recommended that the question and answer on the right column be added to the draft list of FAQs. We further note that reciprocal licensing was permitted in LOAs prior to 15 March 2015 changes, as this was an open filed in the earlier LoA which could be completed on a case by case basis.	<i>Do the definitions in the IEEE-SA Standards Board Bylaws clause 6.1 in effect as of 15 March 2015 apply to the custom LOA form dated 13 June 2019 – Limited?</i> No. When a licensing assurance is provided using the custom LOA form dated 13 June 2019 – Limited, the definitions contained in the Bylaws in effect as of 14 March 2015 shall apply to the exclusion of the definitions contained in the Bylaws in effect as of 15 March 2015, except for the definition of "Reciprocal Licensing".	Partially addressed by answer to comment #13. Sample licensing conditions such as reciprocal licensing can be provided when checking boxes D.1.a or D.1.b	R
26	17J (to be added), 85	The Bylaws in effect as of 15 March 2015 provide a definition of "Reasonable Rate" and specific criteria for its determination. On the contrary, the Bylaws in place as of 14 March 2015 do not offer a definition and leave licensors and licensees free to determine reasonable rates on a case-by-case basis in bilateral negotiations. This diverging approach is confirmed by the FAQs number 38 and 39 in force under the Bylaws in effect as of 14 March 2015 (see attachment). In order to reduce the risk of inconsistencies when a licensing assurance is provided using the Custom LoA Form, it is recommended that the question and answer on the right column be added to the draft list of FAQs.	<i>When a licensing assurance is provided using the custom LOA form dated 13 June 2019 – Limited, what is the meaning of "reasonable rates" and "reasonable terms and conditions"?</i> In such a case, the IEEE-SA does not provide a specific definition of "reasonable rates" and "reasonable terms and conditions". The IEEE-SA takes no position on, and has no responsibility for determining, the reasonableness of disclosed royalty rates or other licensing terms and conditions. The IEEE-SA's acceptance of a Letter of Assurance does not imply any finding that the disclosed not-to-exceed terms are or are not reasonable. The IEEE-SA's approval of a standard does not imply any finding (in the case of a standard for which not-to-exceed terms have been disclosed) that such terms are or are not reasonable or any finding (in the case of a standard for which not-to-exceed terms were not disclosed) that reasonable terms would be greater or less than the disclosed maximum terms (if any) for any other technology. This same comment applies to FAQ 85.	See response to comment #13.	R

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27	17K (to be added)	The Bylaws in effect as of 15 March 2015 provide a definition of "Reciprocal Licensing" and the LoA associated with such policy include a reciprocity option. This is not the case under the old Bylaws in effect as of 14 March 2015, which provide neither a definition nor a reciprocity option. Reciprocity is a common feature of many patent policies and form LOAs that standard-development organisations usually consider, as noted by the DoJ in a letter to ANSI dated 11 October 2018. While there was a lack of a reciprocity option already in the LoA available under the old Bylaws in effect as of 14 March 2015, it was IEEE's practise then to accept LoAs with additional information provided by the applicant and materially added to the LoA in writing. Nowadays, IEEE appears to refuse all the LOAs featuring additional information to the pre-determined template. In order to address the above issue, It is recommended that the question and answer on the right column be added to the draft list of FAQs.	<i>Is it possible to condition the granting of a licensing assurance using the custom LOA form dated 13 June 2019 – Limited upon a Reciprocal Licensing requirement? Yes, the Submitter of an LOA can include a Reciprocal Licensing requirement in the custom LOA form dated 13 June 2019 – Limited, under the conditions provided in in the Bylaws in effect as of 15 March 2015.</i>	Sample licensing conditions such as reciprocal licensing can be provided when checking boxes D.1.a or D.1.b. This is not a new issue created by the custom LOA form dated 13 June 2019 – Limited.	R
28	17L (to be added)	The Bylaws in effect as of 15 March 2015 provide a definition of "Compliant Implementation", amounting to "any product (e.g., component, sub-assembly, or end-product) or service that conforms to any mandatory or optional portion of a normative clause of an IEEE Standard". On the contrary, the Bylaws in place as of 14 March 2015 do not offer a definition of "Compliant Implementation". This substantially diverging approach is confirmed by the circumstance that the FAQs in force under the Bylaws in effect as of 14 March 2015 do not include any sections on the notion of "Compliant Implementation", which is widely addressed in the most recent version of the FAQs at sections 39-41. In order to reduce the risk of inconsistencies when a licensing assurance is provided using the Custom LoA Form, it is recommended that the question and answer on the right column be added to the draft list of FAQs.	<i>When a licensing assurance is provided using the custom LOA form dated 13 June 2019 – Limited, what is the meaning of "Compliant Implementation"? In such a case, the IEEE-SA does not provide a specific definition of "Compliant Implementation". Each submitters is free to determine, compatibly with their business model, at which level of the value chain to offer a license in compliance with the terms indicated in the licensing assurance.</i>	See response to comment #13.	R

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29	17M (to be added)	The old versions of the Bylaws and of the other governing documents, including the FAQs, are no longer immediately accessible on IEEE's website and they are not easy to consult. The old versions of the governing documents need to be made available to the public, particularly in light of the wide set of different LoAs available to IEEE's members, each governed by a separate version of IEEE-SA Standards Board Bylaws. Transparency is a required feature of the standard-development process under competition law in several jurisdictions, and IEEE shall stick to these rules.	<i>Where is it possible to consult current and past versions of IEEE's Bylaws and other governing documents, including FAQs?</i> All the current and past versions of IEEE's governing documents are available on the homepage of IEEE's website at the following link: [relevant link to be added]	Material referenced by the custom LOA form dated 13 June 2019 – Limited is available on the PatCom website.	I
30	26A	The Custom LOA form dated 13 June 2019 does not include an option box that can be checked saying that "such a license will include a Reciprocal licensing requirement," but it should, and FAQ 26A should refer to the Custom LOA form as well.	Add after "in an LOA": "or in the Custom LOA form dated 13 June 2019."	Sample licensing conditions such as reciprocal licensing can be provided when checking boxes D.1.a or D.1.b.	R
31	77 as referenced in 77A	Per our comment on 17F (2nd paragraph), there should be a mechanism to allow for the revocation of blanket assurances submitted on the Custom LOA form dated 13 June 2019 with respect to particular patents that may be essential to future editions, revisions or amendments to a standard, particularly where the patented technology was contributed by a third party without the knowledge and permission of the patent holder.	Add at the end, the following new sentence: "However, a blanket assurance submitted on Custom LOA form dated 13 June 2019 may be revoked with respect to a particular patent that contains an Essential Patent Claim which was contributed to a future edition, revision or amendment of a standard without the knowledge and consent of the patent owner, where the patent owner submits a timely notice that it is not willing to license such patent claims on terms consistent with its blanket licensing assurance."	LOAs, once accepted, are irrevocable.	R
32	77A	Example scenario: if a submitter chooses both LOAs for a same standard, it may invoke contradictory understanding of the assurance. So it is suggested to make it clear that only one valid Letter of Assurance for one respective standard can be accepted.	Yes. As described in FAQ 77, the potential licensee may choose to invoke the terms of any one Accepted Letter of Assurance.	Multiple LOAs for an EPC may be submitted and accepted over time. The licensee chooses from among LOAs if multiple ones have been submitted.	R
33	84A	New FAQ item is suggested to provide a link of related policy document on respective LOAs.	84A. What is the IEEE-SA Patent Policy that is with the effective date of March 14, 2015? Here is the link of the IEEE-SA Patent Policy set forth in the IEEE-SA Standards Board Bylaws, IEEE-SA Standards Board Operations Manual, and FAQ with the effective date of 14 March 2015...	Material referenced by the custom LOA form dated 13 June 2019 – Limited is available on the PatCom website.	R

	A	B	C	D	E
34	84B	New FAQ item is suggested to provide a link of related policy document on respective LOAs.	84B. What is the IEEE-SA Patent Policy that is with the effective date of March 15, 2015? Here is the link of the IEEE-SA Patent Policy set forth in the IEEE-SA Standards Board Bylaws, IEEE-SA Standards Board Operations Manual, and FAQ with the effective date of 15 March 2015...	Material referenced by the custom LOA form dated 13 June 2019 – Limited is available on the PatCom website.	R
35	85A	<p>The edit proposed by the undisclosed Committee effectively changes the LoA for that was in force on 14 March 2015 by eliminating box D.1D. In doing so, the drafters have imposed a rule adopted in December 2018 on the historic 14 March 2019 form.</p> <p>Such picking and choosing is inconsistent with the presentation of the “13 June 2019” form as consistent with the “14 March 2015” Patent policy (and hence LoA form, which is part and parcel of the patent policy). FAQ 85A as proposed revises the “14 March 2015” LoA and thus patent policy, through a revision that was approved in December 2018 and took effect on 1 June 2019. It needs to be corrected, otherwise presenting the form as the “14 March 2015” LoA is misleading.</p> <p>This retroactive attempt to revise the “14 March 2015” LoA” form adds a burden on patent holders that was not found in the “14 March 2015” policy, because it effectively places a duty on the patentholder to search its portfolio. It also opens the door to many questions. For example:</p> <p>Are patent holders expected to submit new LOAs whenever they discover a new patent claim that reads on the standard (notably, the standard is dynamic and keeps changing)? That can add up to dozens of LOAs. If so, what would be the time frame for such new statements? What would be the ramifications, if any, of failing to send in such a new form given that the IEEE-SA policy does not mandate a patent search?</p> <p>The change proposed by the undisclosed Committee appears aimed at changing the FAQs to the benefit of technology users and detriment the of patent holders.</p>	<p>Revise the sentence as follows (new text is in red font, deleted text is stricken through):</p> <p>“Consistent with the IEEE-SA Patent Policy that was in effect as of 14 March 2015, including the 14 March 2015 FAQs and pertinent governance documents,</p> <p>¶The custom LOA form dated 13 June 2019 – Limited may not be used to decline to provide licensing assurance or to make a statement of non-awareness of potential Essential Patent Claims. For such declarations, the IEEE LOA form available at https://development.standards.ieee.org/myproject/public/mytools/mob/loa.pdf must may also be used. “</p>	<p>Use of the custom LOA form dated 13 June 2019 – Limited is only for agreeing to license.</p> <p>As stated in section G of the custom LOA form dated 13 June 2019: "If, as described in Clause 6 of the IEEE-SA Standards Board Bylaws, the Submitter becomes aware of additional Patent Claims not already covered by an existing Letter of Assurance that are owned, controlled, or licensable by the Submitter that may be or become Essential Patent Claims with respect to the standard identified in C above, the Submitter agrees to submit a Letter of Assurance stating its position regarding enforcement or licensing of such Patent Claims."</p>	R

	A	B	C	D	E
36	85A	<p>Most negative LOAs received after the change to the patent policy in 2015 were also provided by submitters with statements in different forms that as a Patent holder they would be willing to license under the previous IEEE policy.</p> <p>Assuming a patent holder refuses to license under the new policy AND under the previous policy, IEEE has not provided tools to allow for anyone to understand what the refusal to license relates to.</p>	<p>It is proposed to:</p> <p>1) include on the custom LOA form the negative option that was in existence;</p> <p>2) modify 85A FAQ text as follow:</p> <p>85A. How does When a Submitter declines to provide licensing assurance or make a statement of non-awareness of potential Essential Patent Claims using the custom LOA form dated 13 June 2019 – Limited, to which standards or project does it apply?</p> <p>The custom LOA form dated 13 June 2019 – Limited may not only be used to decline to provide licensing assurance or to make a statement of non-awareness of potential Essential Patent Claims for projects and standards with a PAR dated prior to 15 March 2015. This negative LOA applies to standards and projects started prior to 14 March 2015 and applies to subsequent amendments and versions of the standard which continues to include the related technology.</p> <p>The custom LOA form dated 13 June 2019 – Limited may not be used to decline to provide licensing assurance or to make a statement of non-awareness of potential Essential Patent Claims for projects and standards with a PAR started after 15 March 2015.</p> <p>For such declarations, the IEEE LOA form available at https://development.standards.ieee.org/myproject/Public/mytools/mob/loa.pdf must be used.</p>	Out of scope. Comments only accepted on FAQs.	R

	A	B	C	D	E
37	FORM	A Patent Holder should not have to go through an FAQ to figure out which form should be used and in which instance.	<p>It is proposed to add text to the custom LOA form and the current form to clarify which one to use when as follows:</p> <p>Text for the "current LOA form":</p> <p>This form needs to be used for any standard and project with a PAR date of 15 March 2015 or after and developed under the IEEE patent policy dated 15 March 2015.</p> <p>This form may also be used for standards and projects with a PAR date prior to 15 March 2015, however the custom LOA form dated 13 June 2019 can also be used for these standards and projects which correspond to the prior IEEE patent policy in effect on 14 March 2015.</p> <p>Text for the custom LOA form:</p> <p>This custom LOA form can be used for any standard and project with a PAR date prior to 15 March 2015, started under the IEEE policy in effect prior to 15 March 2015.</p> <p>This custom LOA form shall not be used for any standard and project, started under the current IEEE policy, with a PAR date after 15 March 2015.</p>	Out of scope. Comments only accepted on FAQs.	R
38	FORM	it can create a lot of confusion to have an "intermediate form and policy" rather than having both the pre-march 15th form and policy and the post march 15th 2015 form and policy.	it is suggested that to avoid confusion and avoid the creation of additional clarification questions in the FAQ, IEEE reinstall the pre 15 March 2015 form, IPR policy and related governing document for any PAR project/standards started prior to that date instead of creating an intermediate custom LOA form.	Out of scope. Comments only accepted on FAQs.	R

	A	B	C	D	E
39	FORM 13 June 2019 LoA Page 2	<p>Since 2015, IEEE-SA has repeatedly declined to accept submitted LoA, often time refusing to provide an explanation for the rejection.</p> <p>The newly introduced “13 June 2019” LoA, unlike the “1 June 2019” LoA, does not include a reciprocity “tick box”. Given IEEE-SA trend in recent years to reject LoAs that have attachments, there needs to be an IEEE SA assurance in the FAQs that Submitters of the “13 June 2019” form would be able to grant their assurance subject to reciprocity.</p> <p>The ability to make RAND assurance subject to reciprocity is key, because patentholders are often willing to give access to the technology, only in return for not being excluded themselves by the implementer/technology-user benefiting from this commitment.</p> <p>Without an assured path to providing RAND assurance subject to reciprocity, a patent holder may choose to give a negative LoA. As noted earlier, such result would conflict with the stated purpose for introducing the “13 June 2019” LoA, which was “to increase the number of [positive] statements of licensing assurance that are provided to IEEE in an acceptable format” (See https://development.standards.ieee.org/myproject/Public/mytools/moh/loa-13June2019limited-</p>	<p>See suggested change to FAQ 31.</p> <p>Also, you may want to revise the form by adding the following tick box as the last option under D.1.b.:</p> <p>“ o (Optional) Such a license will include a Reciprocal Licensing requirement.”</p>	<p>Out of scope. Comments only accepted on FAQs.</p> <p>Note that both approved LOA forms allow for the attachment of Sample Licensing Terms when box D.1.a or D.1.b are checked. Those samples can include reciprocity terms.</p>	R
40	FORM 13 June 2019 LoA Page 2	The undisclosed person or group of persons who drafted this LoA have/s omitted Section D.1.d. from the “14 March 2015” LoA form. See comments above on FAQ 85A	<p>Bring deleted box D.1.d back into the form and have it read as it read on the “14 March 2015” LoA form.</p> <p>From memory, since it’s not publicly available, I believe it used to read:</p> <p>“ <input type="checkbox"/> d. The Submitter is unwilling or unable to grant licenses according to the provisions of either a or b above or to agree that it will not enforce its Essential Patent Claims as described in c above.”</p>	Out of scope. Comments only accepted on FAQs.	R

	A	B	C	D	E
41	FORM 13 June 2019 LoA Page 4 Related to comment on FAQ 85	Listing only “IEEE-SA Standards Board Bylaws clause 6.1” is incomplete description of the definitions that were in effect on 14 March 2015. The “14 March 2015 FAQs” also need to be listed as well as any other pertinent IEEE-SA governance documents (these may include, for example, resolutions).	Revise as follows (new text is in red font, deleted text is stricken through): Should any discrepancy exist between the definitions above and the definitions in the IEEE-SA Standards Board Bylaws clause 6.1, related FAQ document titled “Understanding Patent Issues During IEEE Standards Development,” and other pertinent IEEE-SA governance document , the definitions contained in the Bylaws, FAQ document, and pertinent IEEE-SA governance documents in effect as of 14 March 2015 shall control.	Out of scope. Comments only accepted on FAQs. Please note the change proposed in the answer to comment 2: Effective 13 June 2019, for projects (including amendments) or standards with a PAR approval date preceding the 15 March 2015 effective date of the updates to the text of the IEEE-SA Patent Policy, the custom LOA form dated 13 June 2019 – Limited may be submitted and, if accepted, the text of the IEEE-SA Patent Policy in effect on 14 March 2015, as found in Clause 6 in the IEEE-SA Standards Board Bylaws and Clause 6.3 in the IEEE-SA Standards Board Operations Manual, will apply. (See also questions 15C, 17F, and 84.) (Note: add hotlinks to Bylaws and Ops Man words in above - https://development.standards.ieee.org/myproject/Public/mytools/mob/SASB-OpMan-Dec2014.pdf https://development.standards.ieee.org/myproject/Public/mytools/mob/SASB-Bylaws-Dec2014.pdf)	R

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42	<p>FORM Related to comment on FAQ 85</p> <p>13 June 2019 LoA</p> <p>Page 3</p>	<p>The language on the box on the bottom of page 3 is problematic, for the following reasons:</p> <p>(1) It references both the new 2015 policy and the “14 March 2015” policy together. The first sentence seems to reference the 2015 patent policy. The second sentence references the “14 March 2015” patent policy.</p> <p>Submitters are therefore left unsure under what policy they are submitting</p> <p>It is also unclear why the first sentence is necessary.</p> <p>(2) The “IEEE Patent Policy, IEEE-SA Standards Board Bylaws, and IEEE-SA Standards Board Operations Manual in effect as of 14 March 2015” are not publicly available anywhere. How are Submitters supposed to know the terms under which they are submitting?</p> <p>(3) In the second sentence, the “IEEE Patent Policy, IEEE-SA Standards Board Bylaws, and IEEE-SA Standards Board Operations Manual in effect as of 14 March 2015” are not a complete description of the policy that was in effect on 14 March 2015. The “14 March 2015 FAQs” also need to be listed as well as any other pertinent IEEE-SA governance documents (these may include, for example, resolutions)</p>	<p>Revise as follows (new text is in red font, deleted text is stricken through):</p> <p>“IEEE Patent Policy and the procedures used to execute that policy are documented in the IEEE-SA Standards Board Bylaws and the IEEE-SA Standards Board Operations Manual. The All terms and definitions set forth in the (1) IEEE Patent Policy, (2) IEEE Patent Policy FAQs, (3) IEEE-SA Standards Board Bylaws, and (4) IEEE-SA Standards Board Operations Manual, and (5) IEEE-SA governance documents in effect as of 14 March 2015 are incorporated herein and apply to this submitted form to the exclusion of any later versions of these documents. These referenced documents are available on the IEEE-SA website at www.public_links_to_14-March-2015_documents.com”</p> <p>The URL at the end of the suggested “fix” is provided as an example for its potential formulation.</p>	<p>Out of scope. Comments only accepted on FAQs. Please note the change proposed in the answer to comment 2:</p> <p>Effective 13 June 2019, for projects (including amendments) or standards with a PAR approval date preceding the 15 March 2015 effective date of the updates to the text of the IEEE-SA Patent Policy, the custom LOA form dated 13 June 2019 – Limited may be submitted and, if accepted, the text of the IEEE-SA Patent Policy in effect on 14 March 2015, as found in Clause 6 in the IEEE-SA Standards Board Bylaws and Clause 6.3 in the IEEE-SA Standards Board Operations Manual, will apply. (See also questions 15C, 17F, and 84.)</p> <p>(Note: add hotlinks to Bylaws and Ops Man words in above -</p> <p>https://development.standards.ieee.org/myproject/Public/mytools/mob/SASB-OpMan-Dec2014.pdf</p> <p>https://development.standards.ieee.org/myproject/Public/mytools/mob/SASB-Bylaws-Dec2014.pdf</p>	R