

Annex D **(informative)**

Inquiries and Suggestions for Change

D.1 Introduction

This Annex describes the process established by API for 1) submitting inquiries to API, and 2) for submitting suggestions for changes to this standard. Inquiries and suggestions for change are welcome and encouraged, because they provide useful reader feedback to the responsible API Committee regarding technical accuracy, current technology use, clarity, consistency, and completeness of the standard. API will attempt to answer all valid inquiries. Submittals not complying with this Annex will be returned unanswered.

Sections D.2 through D.8 below cover the submitting of inquiries. See Section D.9 for instructions about submitting suggestions for change.

D.2 Inquiry References

D.2.1 API maintains several websites that provide information that should be reviewed before submitting an inquiry.

D.2.2 Your inquiry may have been previously addressed by the Subcommittee and the resulting interpretation posted on the API web site as follows:

For all standards: <http://mycommittees.api.org/standards/techinterp/default.aspx>

For Refining Standards: <http://mycommittees.api.org/standards/techinterp/refequip/default.aspx>

For both links, click on the standard in question to download the file.

D.2.3 In addition, an addendum or errata, which may have addressed your issue, can be found on the API website here:

http://www.api.org/products-and-services/standards/program-information/addenda-and-errata#tab_refining

D.3 Definitions

D.3.1 **inquiry**

A question that asks what is the meaning of a specific paragraph, figure, or table in the standard; i.e. what do the words say. It is not a question that asks about the intention of the standard.

D.3.2 **interpretation**

The answer to the inquiry. Typically, the answer is simply a “Yes” or “No” response, with a brief clarification if needed. This term is also used to refer to the combined question and answer.

D.4 API Policy Regarding Inquiries

D.4.1 API has established the following limits on its activity in the handling of inquiries.

- a) API does not approve, certify, rate, or endorse any item, construction, proprietary device, or activity.
- b) API does not act as a consultant on specific engineering problems.

c) API does not provide information on the general understanding or application of the standard.

D.4.2 All inquiries and resulting interpretations will be made available to the public on the API website.

D.5 Submission of Inquiries

D.5.1 An electronic form for submitting a request for interpretation can be found on the API website at <http://rfi.api.org/Index.aspx>. Please use this means to submit your inquiry.

D.5.2 All inquiries must comply with the following.

- a) Current standard: If an inquiry refers to a version or addendum that is not the latest, the Subcommittee will develop the interpretation based on the requirements stated in the current version.
- b) Specific Reference: The applicable paragraph number, figure number, or table number must be cited in the inquiry.
- c) Sentence Structure: Inquiries must be written such that the answer can be a YES or NO, with technical details added if necessary. The inquiry statement should be technically and editorially correct, and written in understandable English.
- d) Background: Providing a background explanation is optional, but is encouraged to assist the committee in understanding the query.
- e) Single Subject: The scope of an inquiry shall be limited to a single subject or a group of closely related subjects.
- f) General Format:
 - 1) The general format of the inquiry should be as follows: "Does Paragraph XXX of API-6XX require that?"
 - 2) The inquirer shall state what is required in his or her opinion, as the answer to the query.
 - 3) If a revision to the standard is believed to also be needed, provide recommended wording.
- g) The Inquirer should not use the inquiry process to improve his general understanding, design skills, and usage of the standard. Consultants not affiliated with API are available for this purpose.
- h) It is important that the Inquirer understand the difference between an inquiry and a suggestion for change. API encourages both, but the submittal and committee handling procedures are different.

D.5.3 General guidelines for submission of standards inquiries can also be found on the API website at:

<http://www.api.org/products-and-services/standards/standards-inquiries>

For technical inquiries:

http://www.api.org/products-and-services/standards/standards-inquiries#tab_submit

D.6 Typical Inquiry Procedure

D.6.1 The typical procedure of an inquiry is as follows.

- a) The Inquirer must prepare the inquiry, including any necessary background information, in full compliance with this Annex and submit to the API Standards Coordinator.

- b) API Standards Coordinator checks the inquiry to verify compliance with the requirements of submitting an inquiry.
- c) If the inquiry cannot be answered for any reason, the Coordinator will issue a response to the inquirer advising the reason(s) for not answering the inquiry. A form or checklist will typically be used for this response.
- d) If the Coordinator believes the inquiry is valid, it will be forwarded to the Subcommittee for study, and the inquirer will be so advised using the form letter.
- e) The Subcommittee will evaluate the inquiry and either develop a response or determine that the inquiry cannot be answered, and advise the Coordinator accordingly. The Subcommittee will consider the need for modifying the standard to resolve technical issues, add new requirements, make editorial corrections, improve clarity, remove conflicts, etcetera.
- f) The interpretation will be published on the API website when approved by the Subcommittee.

D.6.2 The time required to process a valid inquiry as described in 6.1 may take as long as a year.

D.7 Interpretations Responding to Inquiries

D.7.1 An interpretation is written by the Subcommittee to provide the specific answer to an inquiry. If the inquiry is properly phrased, the interpretation can be a one-word response. With many inquiries, there may be a need to provide clarifying statements, such as the limits on the applicability.

D.7.2 Although it is not possible to develop interpretations quickly to remedy immediate needs, the industry benefits as a whole when inquiries are utilized as a means of trying to understand the technical requirements in the standard.

D.7.3 The API inquiry process is intended to help users understand the technical requirements in the standard without providing the intent, background, and technical basis. The posted interpretations (responses) to inquiries are based on the standard's edition/addendum in effect when the interpretation was prepared. Before applying any interpretation, always look for a later interpretation (if one exists). If there is a conflict between interpretations, use the latest interpretation. If there is a conflict between an interpretation and the current issue of the standard, use the current standard.

D.8 Form Response Sent to Inquirer

D.8.1 A form letter or email will be used to reply to inquirers indicating the action taken by API, and, if applicable, the reason(s) for not being able to accept the inquiry.

D.8.2 Reasons for not being able to accept an inquiry may include:

- a) Current standard not referenced
- b) Consulting services requested
- c) Asks API to endorse a proprietary or specific tank design
- d) Asks for the technical basis for requirements
- e) Unclear question or inadequate background given
- f) Unrelated subjects

g) Format of inquiry

D.9 Suggestions for Changes

D.9.1 A “Suggestion for Change” is not an inquiry; it is simply a communication (email preferred) from a reader to API proposing that a specific change be made to the standard.

D.9.2 Any format is acceptable, as long as the content is clear.

D.9.3 The most effective means to submit suggestions is to send an email to the API Coordinator (standards@api.org).

D.9.4 The content of a suggestion must include the standard number, edition, and addendum in question. The relevant paragraph numbers, table number, figure number, etc., must also be stated. Provide as much explanation as necessary to be sure the Subcommittee understands the technical issues. Provide specific language that you think is needed to implement the change. Last, include your name, company affiliation if any, and your return email or mailing address.

D.9.5 API will forward all suggestions that are suitably written to the Subcommittee for consideration. The Subcommittee will evaluate each suggestion and determine if a change is needed. Suggestions that are accepted by the Subcommittee will be reflected in a future edition or addenda, but a reply advising the submitter of the Subcommittee’s decision may not be issued.