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Rule Making Process

Thank you for offering to help me gain access to these documents, despite the fact that they are copyrighted. I write to explain why I no longer require that access and to provide additional comments on the ISO standards.

As it turns out, excellent overview information on all ISO documents is publicly available at the ISO website (go to <https://www.iso.org/> then search by document number and, for any given document, click on "Preview". In most cases, that gets you the Introduction, overview of contents, definition of terms, and bibliography).

Lifecycle Analysis

Based on that information, I have determined that the ISO documents do not provide answers to my specific questions about methane leakage. This appears to be a general feature of ISO documents - they describe a methodology for producing credible and transparent assessments of environmental impacts, but they do not specify what values of measurable quantities (like methane leakage rate) ought to be used in those assessments.

The ISO 14040/44 documents provide a general framework for Life Cycle Analysis, with illustrative examples that involve Greenhouse Gas (GHG) emissions. However, ISO provides much more detailed guidance on GHG reporting methodology in other documents (the "14060 family"). Therefore, these are likely relevant to the GAP rulemaking process as well. I have perused the publicly available portions of these documents and very much agree with the goals and approach found therein. For example, the Introduction to ISO 14064-1:2018 (available at <https://www.iso.org/standard/66453.html>) states, "Specifically, the use of the ISO 14060 family [along with other goals]: enhances the credibility, consistency and transparency of GHG quantification, monitoring, reporting, verification and validation." That captures very well my own hopes for the GAP rulemaking process regarding the specific issue of methane leakage.