



VEYRUM ROBOTICS STANDARD



VRS-GEN-011

Public Comment and Errata Procedure

Comment periods, the Unverified-rating notice-and-comment window, errata intake, and the public disposition record for VRS documents and ratings.

VEYRUM RESEARCH INSTITUTE

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Contents

1 Introduction

2 1 Scope

3 2 Normative references

4 3 Terms and definitions

5 4 Comment periods and the Unverified-rating notice-and-comment window

5.1 4.1–4.5 Document comment periods

5.2 4.6–4.14 The Unverified-rating notice-and-comment window

6 5 Errata intake

7 6 Disposition

8 7 The public record

9 8 Boundary with appeals and objections

10 9 Worked example

11 Bibliography

12 Change history

Foreword. This Standard defines the public participation machinery of the VRS library: comment periods, the notice-and-comment window that precedes every Unverified rating, errata intake, and the disposition record. Open, answered comment is the legitimacy mechanism of the reference institutions — the ISO/IEC Directives enquiry stage, the ANSI due-process guarantee, the IETF last-call and RFC-errata system, and W3C wide review — and the standing defence against “arbitrary methodology” criticism, while VRS-GEN-003 §5.3 guarantees commenters advise, never approve. This Standard owns the comment/errata/disposition machinery and the Unverified-rating notice-and-comment workflow; rating appeals live in VRS-GEN-008 §8, change instruments in VRS-GEN-004 §4, and designation footprints in VRS-GEN-002 §8 — each is cross-referenced here, never restated. Requirements use “shall”; recommendations use “should”.

1 Introduction

A standard that manufacturers, insurers, and lenders worldwide are asked to adopt earns adoption only if anyone affected can challenge it and get a reasoned answer on the record. Every reference institution treats open comment and a published disposition as the source of that legitimacy: ISO/IEC take national comments toward consensus at the enquiry stage; ANSI guarantees the right to express a position, have it considered, and appeal; the IETF runs an open last-call and a public errata portal; W3C hears formal objections and resolves them by reasoned decision. This Standard fixes, for the VRS, who may comment, how errors are triaged and corrected without smuggling in requirement changes, and what the permanent public record must contain — so that a rating built on these documents can be defended as evidence rather than assertion. It also fixes the notice-and-comment window that precedes every Unverified rating, so that a manufacturer rated on public evidence alone is given notice, an opportunity to engage for a higher tier, and a comment window before the rating enters the public record.

2 1 Scope

This Standard defines: comment periods for documents and the Unverified-rating notice-and-comment window (Clause 4); errata intake and the errata status ladder (Clause 5); disposition (Clause 6); the public record (Clause 7); the boundary with appeals and objections (Clause 8); and a worked example (Clause 9). It excludes rating appeals and the issued-rating lifecycle (VRS-GEN-008 §8), the change instruments themselves (VRS-GEN-004 §4), designation mechanics for corrections (VRS-GEN-002 §8), and the criteria, ceilings, and evidence rules used to score an Unverified rating (VRS-GEN-005, VRS-GEN-006 §5, VRS-GEN-012), which are cross-referenced, never restated.

3 2 Normative references

- **VRS-GEN-002**, Designation, Drafting and Style Rules (undated) — errata/corrigendum designation footprints (§8).
- **VRS-GEN-003**, Governance Charter and Independence Statement (undated) — the advise-never-approve boundary (§5.3) and independence from commercial pressure (§6).

- **VRS-GEN-004**, Change, Edition and Review Policy (undated) — change instruments and their tier limits (§4), roadmaps (§5.2), and the Summary of Changes (§9).
- **VRS-GEN-005**, Intrinsic Rating Methodology (undated) — the tiers (Unverified/Verified/ Certified), ceilings, and cold-start parity (§6).
- **VRS-GEN-006**, Application Rating Scheme (undated) — sector applicability order (§5).
- **VRS-GEN-008**, Application of Ratings (undated) — rating appeals and validity states (§8).
- **VRS-GEN-009**, Robot Risk Passport and Registry Schema (undated) — where records resolve.
- **VRS-GEN-012**, Evidence and Data Requirements (undated) — the evidence kinds and bars an Unverified rating is scored against.

4 3 Terms and definitions

Per VRS-GEN-001. Locally:

- **comment** — any submission against a draft or published VRS document raising a technical, editorial, or procedural point.
- **objection** — a comment whose submitter asks, on the record, that a specific decision be reconsidered before an edition publishes.
- **erratum** — a suspected error report against a *published* document.
- **disposition** — the recorded, reasoned response to a comment or objection: one of *accepted*, *accepted-with-modification*, *rejected-with-reason*, or *deferred*.
- **notice of intent** — the notice by which Veyrum informs a manufacturer that a named model will be assessed and rated at the Unverified tier under a stated VRS edition (4.7).
- **engagement window** — the period, following a notice of intent, in which the manufacturer may elect a Verified or Certified assessment in place of the Unverified review (4.8).

5 4 Comment periods and the Unverified-rating notice-and-comment window

5.1 4.1–4.5 Document comment periods

4.1 Every roadmap (VRS-GEN-004 §5.2) and every draft edition of a normative document shall have a public comment period of at least **30 days** before publication.

4.2 Where a comment period results in a **substantive change** to the draft, the changed provisions shall be re-issued for a further comment period of at least **14 days** before publication (the recirculation principle), so that no requirement takes effect without having been open for comment in its final form.

4.3 Comments may be submitted by anyone. Rated and commercial parties shall identify themselves as such and shall declare any material interest, so the disposition record shows who sought a change and why. Anonymous technical comments are accepted; anonymous objections carry no standing in the disposition record.

4.4 Comments and objections advise; they never bind. No commenter class holds approval authority (VRS-GEN-003 §5.3), and no comment shall be resolved by fee, sponsorship, or other commercial

arrangement (VRS-GEN-003 §6).

4.5 Each comment shall be assigned a stable comment identifier on receipt so that it can be tracked from submission to disposition and resolved from the public record (Clause 7). A comment intake channel should accept a machine-readable submission carrying the target designator, clause number, and proposed change text.

5.2 4.6–4.14 The Unverified-rating notice-and-comment window

4.6 This subclause governs the notice-and-comment workflow that every Unverified rating shall follow before publication. An Unverified rating is assessed by Veyrum from public evidence alone; it is an opinion above the compliance floor, not a certification. The workflow gives the rated manufacturer notice, an opportunity to engage for a higher tier, and a comment window before the rating enters the public record.

4.7 An Unverified rating shall be opened only for a robot model that has been publicly available for at least **6 months**. The notice of intent (4.8) may be sent at month **5** so that the review begins at month 6.

4.8 Before assessment, Veyrum shall send the manufacturer a **notice of intent** stating that the named model will be assessed and rated at the Unverified tier under the applicable VRS edition, that the Verified and Certified tiers are available on engagement, and that an engagement window of at least **30 days** applies.

4.9 If, within the engagement window, the manufacturer engages for a Verified or Certified assessment, the Unverified review is superseded and this workflow closes.

4.10 Where no engagement supersedes it, Veyrum shall assemble the public evidence for each criterion, score it against the Unverified ceilings, and determine sector applicability in the order of VRS-GEN-006 §5, then draft the Intrinsic Rating and the sector Application Ratings. Evidence kinds and bars are those of VRS-GEN-012; ceilings and tiers are those of VRS-GEN-005 §6. An inapplicable sector is shown “—”, never a poor letter.

4.11 Veyrum shall then send the manufacturer a **results notice** carrying the draft rating and its evidence basis, opening a comment window of at least **7 days**.

4.12 Comments received in the results-notice window shall be considered before publication; consideration guarantees neither acceptance nor a change to the draft. A comment that alleges a methodology defect is additionally handled under 6.4.

4.13 After the comment window closes, the rating shall be published at tier **Unverified** with its VRS edition and date, and the notice-and-comment timeline — notice of intent, engagement window, results notice, and comment window, each with its date — shall be recorded in the registry (VRS-GEN-009) so the process is resolvable from the public record (Clause 7).

4.14 No Unverified rating shall be issued until this workflow and its public procedure page are operational; this is a launch gate, not a design gap. Until then, nothing in this Standard asserts that any model holds a Veyrum rating.

6 5 Errata intake

5.1 Anyone may report a suspected error in a published document at any time; each report shall receive an erratum identifier on receipt.

5.2 Every erratum shall be triaged into exactly one status of the **errata status ladder** — modelled on the RFC Editor errata system (Reported → Verified / Held / Rejected) and mapped onto the VRS-GEN-004 §4 instrument tiers:

STATUS	MEANING	RESULTING INSTRUMENT (VRS-GEN-004 §4)
Reported	Received, not yet triaged	none yet
Verified — editorial	Confirmed error, no technical meaning changes	editorial correction
Verified — technical	Confirmed error in a requirement, threshold, or value	corrigendum
Held for revision	Confirmed, but the fix needs a bounded delta or larger change	amendment / revision
Rejected	Not an error, or out of scope	none (reasoned rejection recorded)

5.3 Triage shall apply the classification rule of VRS-GEN-004 §4.2: an error fix shall never add, remove, or re-threshold a requirement. A report that can only be resolved by changing a requirement shall be triaged **Held for revision** and routed to the normal change cycle, not published as a corrigendum.

5.4 A constant's *value* shall never be changed by erratum in a document; constants change only in the data twin via the calibration toolkit with a derivation (VRS-GEN-202). An erratum against a constant shall be limited to correcting a transcription error between the twin and its prose.

5.5 Confirmed errata (Verified — editorial or technical) shall be published promptly with their designation footprint (VRS-GEN-002 §8), not held for the next edition.

7 6 Disposition

6.1 Every comment received in a comment period and every erratum shall receive a recorded disposition (6.1 for comments before the edition publishes; for errata, within the triage of Clause 5).

6.2 Dispositions shall be reasoned. “Rejected” without a stated reason is not a valid disposition, and a rejected objection shall record why the underlying decision stands.

6.3 A disposition shall be issued within a defined target window; the default is **60 days** from close of the comment period or from erratum receipt. Where a disposition is *deferred*, it shall name the edition or review in which the point will be reconsidered.

6.4 Rating-appeal outcomes that reveal a methodology defect (VRS-GEN-008 §8) enter this process as comments against the affected document, so that a defect found through one rating is fixed for all.

8 7 The public record

7.1 For each published edition, the comment-disposition record shall be published alongside the Summary of Changes (VRS-GEN-004 §9): each comment identifier, who commented (or “anonymous”), the substance, and the disposition with its reason.

7.2 For each published document, the errata record shall be published and kept current, showing each erratum identifier, its status on the ladder (Clause 5), and the resulting correction.

7.3 Both records are retained permanently with the document’s history and shall remain resolvable by identifier (VRS-GEN-009). A comment or erratum shall never be removed from the record; a superseded entry is annotated, not deleted.

9 8 Boundary with appeals and objections

8.1 A **comment** or **objection** under this Standard concerns a *document*; a **rating appeal** concerns an *issued rating* and is governed solely by VRS-GEN-008 §8. A submission shall be routed to whichever process fits its subject, and a submitter shall not be required to use both.

8.2 Where an appeal exposes a document defect, VRS shall open a comment against the document under this Standard (6.4) while the appeal itself is resolved under VRS-GEN-008 §8.

10 9 Worked example

A robot manufacturer, during the 30-day comment period on a draft sector standard, submits a comment (identifier **C-2027-0142**) arguing that an exposure denominator double-counts standby time, and identifies itself as a rated party (Clause 4.3). The change is technical, so the editor drafts a modified definition. Because the modification is substantive, the changed clause is recirculated for a further 14 days (Clause 4.2). No further comment arrives; the edition publishes with disposition **C-2027-0142: accepted-with-modification – denominator redefined to exclude declared standby; see Summary of Changes** recorded in the public record (Clause 7.1) with the commenter’s declared interest shown.

Separately, the Unverified-rating window runs for a model that has been on sale for eight months. Veyrum sends a notice of intent at month 5 (Clause 4.7–4.8); the manufacturer does not engage within the 30-day window (Clause 4.9), so Veyrum assembles the public evidence, scores each criterion against its Unverified ceilings, determines sector applicability (VRS-GEN-006 §5), and drafts the IR and sector ARs (Clause 4.10). A results notice opens a 7-day comment window (Clause 4.11); the manufacturer’s comment correcting a mis-cited hardware revision is accepted, while its request to raise a letter is declined because no further public evidence supports it (Clause 4.12). The rating publishes at tier Unverified with its edition and date, and the notice/engagement/results/comment timeline is recorded in the registry (Clause 4.13).

A reader then files an erratum (**E-2027-0031**) against a *published* standard: a cross-reference points to the wrong clause. Triage finds no technical meaning change, so it is **Verified – editorial** (Clause 5.2) and fixed by an editorial correction with its designation footprint (Clause 5.5). A second erratum (**E-2027-0033**) claims a hazard threshold is set too low. This can only be resolved by re-thresholding a requirement, which an erratum shall never do (Clause 5.3); it is triaged **Held for revision**, routed to the

next amendment cycle, and recorded as such — a reasoned disposition that leaves the requirement unchanged until the governed change process runs.

11 Bibliography

- ISO/IEC Directives, Part 1, 2024 (Consolidated JTC 1 Supplement, 2024) — enquiry-stage comment consideration and consensus. <https://www.iso.org/sites/directives/current/consolidated/>
- ANSI Essential Requirements: Due process requirements for American National Standards, 2025 Edition — right to express a position, have it considered, and appeal; resolution of comments. <https://www.ansi.org/american-national-standards/ans-introduction/essential-requirements>
- IETF RFC 2026 (BCP 9), *The Internet Standards Process — Revision 3*, S. Bradner, 1996. <https://www.rfc-editor.org/info/rfc2026>
- RFC Editor, *How to Verify RFC Errata* — errata status ladder (Reported → Verified / Rejected / Held for Document Update); Web portal launched November 2007. <https://www.rfc-editor.org/series/errata/how-to-verify/>
- IETF RFC 8729, *The RFC Series and RFC Editor*, 2020 — community involvement and accountability framework. <https://www.rfc-editor.org/info/rfc8729/>
- W3C Process Document, 12 June 2023 (W3C/2023/Process-20230612) — wide review and reasoned resolution of Formal Objections. <https://www.w3.org/2023/Process-20230612/>
- OMB Circular A-119 (Revised), effective 27 January 2016 — openness and due-process criteria for voluntary consensus standards. https://www.nist.gov/system/files/documents/2025/09/17/revised_circular_a-119_as_of_01-22-2016.pdf
- United States Administrative Procedure Act, 5 U.S.C. § 553 (1946) — notice-and-comment archetype for public participation.

12

Change history

DATE	VERSION	STATUS	CHANGE	AUTHORITY
2026-09-03	0.1	Draft	Initial draft — NIST/ISO open-process legitimacy pattern; advise-never-approve boundary per GEN-003	Framework Design Brief v1.1
2026-09-12	0.2	Draft	DEEPEN — added Introduction; recirculation on substantive change + comment identifiers (Cl.4); errata status ladder mapped to GEN-004 §4 instruments, constant-value guard (Cl.5); reasoned-disposition window (Cl.6); permanent resolvable comment/errata records (Cl.7); comment-vs-appeal boundary (Cl.8, GEN-008 §8); worked example (Cl.9); dated Bibliography (ISO/IEC Directives 2024, ANSI ER 2025, RFC 2026:1996, RFC Editor errata, RFC 8729:2020, W3C Process 2023, OMB A-119:2016, APA §553). No requirement re-thresholded; no constant changed. Net +1,346 words (434→1,780); shall 9→29.	Framework Design Brief v1.1
2026-09-16	1.0	Draft	REWRITE (VRS 2026) — added the Unverified-rating notice-and-comment window (Cl.4.6–4.14) per PRD §5.1: 6-month eligibility with month-5 notice, ≥30-day engagement window superseding on Verified/Certified election, ≥7-day results-notice comment window, publication at tier Unverified with edition and timeline recorded in the registry (GEN-009); launch gate stated (4.14). Recast Foreword/Introduction/Scope; added normative refs GEN-005/GEN-006/GEN-012; added terms <i>notice of intent</i> , <i>engagement window</i> ; extended worked example with an Unverified-window walkthrough; removed the retired exposure-denominator phrasing from the example. Errata machinery (Cl.5) unchanged. See GEN-005 §6. No requirement re-thresholded; no constant changed.	vrs-rewrite-instructions-v1 §5.4 (Batch D)

About Veyrum Research Institute

Veyrum Research Institute is the research arm of Veyrum — the independent intelligence and trust layer for the robotics industry (research, ratings and registry, advisory, data, and specialist insurance & finance introductions).

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