

PROBLEMS IN SETTING STANDARDS BASED ON
ATTRIBUTES DESIRED BY CONSUMERS

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A standard based only on those attributes desired by consumers is not a very good standard. True, such standards may become effective if backed by a law that makes compliance mandatory. But, if only the consumer's desires are taken into consideration in developing consumer goods standards, we are not using our American system of free enterprise.

Now lest you gain the impression that I do not believe in Consumer Goods Standards, let me assure you I do. This is a complex world we live in. More and more of the things we buy come to us ready-to-use. There must be standards if we are to have any confidence in what we buy. And of course there are standards, whether we consumers are aware of them or not. I question whether there are many things we think of as Consumer Goods that have not been subjected to a variety of standards along the route from production of the basic materials used, to the finished articles we receive.

As consumers we certainly have a right to expect that things we buy will meet certain standards. At the same time we should make sure that what we demand as consumers does not overburden the producer or distributor to a point that his business may cease to exist. As consumers, we need producers and distributors just as they need us.

It is important to remember that all of us are consumers. And most of us are producers, as well, whether we are producing goods or services. As consumers we may greatly appreciate standards that improve the quality or performance of those things we buy. As producers, are we equally enthusiastic about standards that tend to regulate or regiment our activities? Especially, if we have not had a voice in developing the standards?

Our American Democracy is such that it is our very nature to cling to our individualism and to resist those things that tend to limit it.

A basic philosophy of the American Standards Association is the belief that everyone involved in the use of a standard should have a voice in its development. Another basic concept is that an industry that regulates itself through voluntary standards is stronger than one that has to be policed by law because it cannot or will not regulate itself.

The fact that industry in general has confidence in standards is evidenced by the thousands upon thousands of standards that have been

established and used throughout the years -- by companies, by trade associations and by technical societies. The American Standards Association itself an industry supported, national clearinghouse for voluntary standards is added evidence. There are currently 2000 American Standards alone.

The forerunner of the ASA was established in 1918 by five leading engineering societies to coordinate the development of national standards, to eliminate duplication of efforts and thus avoid confusion in the area of standardization. It was reorganized as the American Standards Association in 1928. ASA has grown to have a membership of over 120 trade organizations and technical societies and more than 2000 company members.

Industry's support of voluntary Consumer Goods Standards is evidenced by the fact that the Consumer Goods Standards Board of the ASA has been in existence for the past twenty-five years. This board is one of 15 standards boards that supervise the standardization activities of our association. There are at present 414 standardization projects under the supervision of these boards.

There are all kinds of standards -- many of which have been handed down to us through the generations and have been accepted by custom. An inch is a standard of measurement, a pound a standard of weight, a dime a standard of monetary value. We take these standards for granted, because we have known them all our lives. We probably haven't even stopped to think of them as standards.

Mr. Webster has many definitions of a standard. To me the most meaningful as applied to our discussion today is:

"That which is established by authority, custom or general consent - in general, a definite level, degree, material, character, quality, or the like - viewed as that which is proper and adequate for a given purpose."

To positively identify Consumer Goods Standards would be difficult. In general, and from the point of view of my organization, the ASA, I might define them as -- those definitions, dimensions, tolerances, performance requirements, safety factors, test methods, specifications, or methods of rating that relate to the condition of the product in its finished state, ready for use by the ultimate consumer.

Consumer Goods Standards might vary from performance requirements for textile fabrics to dimensional standards for kitchen utensils. Or they might be safety standards for portable ladders or power lawn mowers. Based on the work we do at ASA, they are national in application. They may become the basis for an International Recommendation since ASA is the member for the USA of the International Organization for Standardization and the International Electrotechnical Commission.

Problems involved with the development of Consumer Goods Standards are, we believe, both more numerous and more difficult than those involved with standards used by industry only. With the latter, personnel involved with developing the standards are usually highly trained and know what they want before they ever get together to discuss standards. This is not true of the consumer. To begin with, consumers, themselves, aren't very standard.

There is first the problem of determining what the consumer -- and I am using the term collectively -- really wants. Then, having satisfied ourselves that we know what is wanted, there is the problem of establishing how much he will pay for what he wants. Finally, we have the problem of bringing together the many areas of interest substantially concerned with the standard -- to secure a meeting of the minds so that the resultant standard or set of standards will be accepted and used by industry; will be recognized and requested by the consumer. To be effective, a standard must be used by all areas concerned.

The ASA has some basic requirements to be met in the development of all American Standards:

1. The ASA does not initiate standardization projects, except upon a formal request by a trade association, technical society or other organization.
2. The proposal must lend itself to national standardization -- there must be agreement among the areas of interest involved that a national standard is needed and desired and at least reasonable feasible.
3. Organizations and groups substantially concerned with the subject matter of a proposed standard, whether members of ASA or not, have a right to have their views fully considered in the development of a standard.
4. In developing a standard, all areas of interest must be represented -- producer, distributor, consumer, and sometimes general interest groups. There must also be maintained a balance of power between these groups so that the votes of one group may not outweigh those of the others.
5. A proposed standard must have a consensus for approval before it can be approved as American Standard.

The ASA itself is impartial -- it has a responsibility to see that the above mentioned requirements are met.

Even if only the Consumer point of view were to be taken into consideration in developing a Consumer Goods Standard, who is to say what the consumer really wants when the consumer is an individual or a family? In ASA the consumer is represented by such organizations as The American Home Economics Association, The American Association of University Women, and the AF of L - CIO. Committee members from these organizations devote many hours to representing the consumer point of view. Yet I am sure that these same people would be the first to admit that the average shopper does not always know what she wants -- does not often read labels before she buys. She may know what she wants in the way of color or style, but does she always concern herself with performance labels?

As a consumer, I suggest that if there are those in Industry who claim there is no need for informative labeling because consumers don't really want it, I must accept part of the blame. Fortunately, not all of Industry feels this way, and I can redeem myself by not only reading labels but by making certain the retailer knows I am reading them. I am sure you have felt, as we have, that there is a growing interest among consumers in informative labeling.

Establishing performance standards is not always easy. There is ever the question of what degree of performance should be built in. A family with children will need higher performance standards for a rug, for instance, than will a couple with no children. We hear much about so-called "built-in obsolescence" these days, but should wall paint in high style colors be designed to give five years service, when we probably will tire of the color in a couple of years?

Another problem is that of knowing how much the consumer is willing to pay for added quality. When articles are mass produced, it isn't enough that a few consumers are willing to pay extra. Most of them must be willing.

Industry, in many cases, has found that cost of standardization and labeling is balanced off by reduced costs because of fewer returns and fewer complaints. However, if testing and labeling do add to producer and distributor costs, is it not only fair that the consumer share in this cost? How much of this cost is the consumer willing to accept as her fair share?

Our final problem with Consumer Standards is certainly not the least, especially when the standards are voluntary, as is the case with American Standards. Securing agreement on the terms of the standard so that it will be accepted and used by all areas of Industry involved is not simple.

Lip service to a standard is not enough. A case in point is American Standard L22, Performance Requirements for Textile Fabrics. The L22

Standard is actually a collection of standards for textile fabrics for seventy-five end-uses in the areas of women's and girls' garments, men's and boys' garments and household furnishings. Its approval last year, and publication in July was the culmination of ten years cooperative effort by representatives from over forty organizations, all substantially involved in the standard. It is a monumental piece of work and represents literally thousands of hours of work by a group of highly trained and dedicated people in textiles.

Despite the fact that all areas of the textile industry had an opportunity to have a voice in the development of L22, despite the fact that it was approved by letter ballot without a single negative vote, the standard is being vigorously opposed by certain segments of the textile industry. May I add that these same people had a voice in the development of L22. Present resistance is difficult to understand.

Even though there are those who do not want L22 accepted, it is being used. Almost every day we see indications that producers are using it, that more and more buying groups are requiring compliance with L22. We know too that many textile laboratories are using it as a reference point. Others demand meeting the L22 Standards as a requirement for their own private labels.

The L22 labeling provisions are perhaps its least accepted area. To our knowledge, only The American Viscose Corporation indicates compliance with L22 on its labels; however, we understand there are two and a half million of these used each month.

We have confidence in L22 -- that it is a good standard -- that as the textile field gets to know it better, it will be accepted and used. It can and will be improved when factual evidence shows the need.

L22 is only one of our Consumer Goods Standards. There are 77 in all. Once developed and published they do not remain static. To remain effective and useful they must be periodically reviewed and usually are revised. The same fine people who developed these standards normally help with revisions.

Probably no standard will be accepted and used by every segment of every industry. Perhaps we will never reach the point when every consumer will take advantage of the benefits offered her by Consumer Goods Standards. But we are making progress.