

1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comm ent <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted
001				<b>No Comments</b>		
BE 003				No reply from experts		
CH 005				SNV Switzerland		
CH 006			ge	General Question: How to avoid irritations with abbreviations in existing standards like NFA?	- -	
CH 007			ge	General comment: The draft was taxed as being slightly more detailed as the existing Swiss Standard SIA416, but nevertheless very useful: The subcategories given in SIA416 are often the architects view while effective usage may differ considerably. To move the subcategories into the Annex as examples was found to be a good solution.	- -	
CH 008			te	How to measure window or glass area? This measure is used in some legislation.	Include a measure for the transparent part of the windows (German: Fensterlicht)	
CH 009				A special case are built in cupboards	Discussion if this case needs to be mentioned	
FI 010			ge	Finland votes AGAINST to the standard. Nevertheless, the views in Finland were both against the standard and in favour of the standard. Reason for the negative attitude is that Finland has its own area standard. In this preliminary standard there are some area descriptions which are in conflict with the Finnish standard. These miss match points need to be solved before the standard is applicable to Finland. However, Finland sees the need for a common European area/space measurement standard.  In Finland we have our own area measurement standard and the history of it goes far back to the 1980's. The standard itself and text references are commonly used in		

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				<p>Finnish decree, regulations and provisions, thus it is important that this standard is not in conflict with Finnish current practice. At least the following decree, regulations and provisions treat area measurements based on national practices:</p> <ul style="list-style-type: none"> <li>- decree on real estate sale</li> <li>- decree on housing association</li> <li>- decree on rented room/flat</li> <li>- Energy Performance of building calculations; Finnish Building Code</li> </ul> <p>Finland is prepared to vote positive to the standard if our national practices – often based to the Finnish decree – are taken into account in the future preparation of the standard.</p>		
FI 011			ge	<p>The figures should be developed; the example could be more complex to bring out different combinations.</p> <p>The elevation and horizontal views do not match.</p> <p>The figures 1, 2, 3, B3 and B4 should be drawn in correct scales.</p>		
IT 012				<p>We ABSTAIN due to lack of a national position on this specific subject</p>		
NO 013			Ge  Ge	<p>prEN 15221-6 is to be utilised for facility management. In some points it is less suitable for describing the floorage of for instance a detached house for sales purposes.</p> <p>The Norwegian standard NS 3940:2007 has the requirement that free height should be at least 1,90 metres and width at least 0,60 m in order that an a</p>		

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			Ge	<p>floorage should be measurable. The prEN 15221-6 does not use measurability as a criteria for partition or limitation of floorage.</p>		
			Ge	<p>The measuring of volumes is very briefly treated in the prEN 15221-6, without any details. The NS 3940:2007 has in comparison a more detailed description of volume estimations, combined with principles for estimation and various volume-related terms.</p>		
			Ge	<p>The prEN 15221-6 has no term for classification of acreage of roof and facade surfaces. Equivalent surfaces are classified as enveloping building parts (OBD) in the NS 3940:2007.</p>		
			Ge Ge	<p>prEN 15221-6 does not describe partition of building acreage in utility units and common areas as is done in the NS 3940:2007.</p>		
				<p>The floorage hierarchy in the prEN 15221-6 separates Non-functional Level Area (NLA), which are cavities and atria that is areas without floor which are not fulfilling a purpose like elevator shafts or stairwells. Equivalent acreage terms are not used in</p>		

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				the NS 3940:2007, so that all floorage without a floor are included in the floorage categories utility floorage and net floorage.		
NO 014			TE	Non-functional area	<p>Norwegian standard NS3940 does not have defined the non-functional area.</p> <p>We want this to be included as specified in the European standard.</p> <p>There are different practices in the Nordic countries. We recommend using the proposal specified in the standard 15521-6.</p>	
NO 015			TE	Measurable area	<p>Proposal is not sufficient specific for this topic. The Norwegian and Swedish standards have definitions for measurable area.</p> <p>Floor with sloping ceilings and non standard ceiling heights. The subject of measurable areas should be addressed more precisely.</p>	
NO 016			TE	Software suppliers		

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				Commonly used space management systems are currently not capable to differentiate between PWA (partition wall area) and ICA (interior construction area)		
NO 017		Page 18. Table 1	TE	Distinction between unrestricted and restricted seems unnecessary.	If it is included, the concepts must be defined and the difference established using examples.	
PT 018				No comments		
SE 024			te	Non-functional area	Norwegian standard NS3940 does not have defined the non-functional area. We want this to be included as specified in the European standard. There are different practices in the Nordic countries. We recommend using the proposal specified in the standard 15521-6.	
SE 025			te	Measurable area	Proposal is not sufficient specific for this topic. The Norwegian and Swedish standards have definitions for measurable area. Floor with sloping ceilings and non standard ceiling heights. The subject of measurable areas should be addressed more precisely.	

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SE 026			te	Software suppliers Commonly used space management systems are currently not capable to differentiate between PWA (partition wall area) and ICA (interior construction area)		
SE 027		Page 18. Table 1	te	Distinction between unrestricted and restricted seems unnecessary.	If it is included, the concepts must be defined and the difference established using examples.	
SE 028		Page 20.	ed	List must be edited. The text "Here follows..." is part of a list. Delete a)		
SK 029			ge	No available expertise		
DE 031	Bibliography		ed	5 <sup>th</sup> reference: prEN 15221-6?	Please delete prEN 15221-6.	
UK 032	Bibliography		Ed	References do not have ISBN codes Reference to EN15221-1 is missing	Insert ISBN Codes Insert reference	
UK 033	Description of the context	Page 7 to 10	Ge	There seem to be two different introductions in this standard and the reason for 'example of new draft standard' op page 7-10 is unclear.	Delete pages 7 to 10	
FR 034	ENGLISH AND CONSEQUEN	Page 10	ed	« The high number of invoices and the	« The high number of invoices and the	

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	TLY FRENCH TEXT	3 last §		intransparency of the cost and the performance of the procured services » <i>(Last words are not clear)</i>	intransparency of the cost and the low performance of the procured services »	
FR 035	ENGLISH AND CONSEQUEN TLY FRENCH TEXT	Page 10 After § 7 Last §	ed	« With the help and the standardised understanding following benefits and effects can easily be reached: »  <b><i>The first part of the sentence is not understandable</i></b>	« With the help and understanding of the standard, following benefits and effects can easily be reached: »	
UK 036	Example for new draft standards	Page 7 - first paragraph	Te	Wording of paragraph needs to be re-written for better clarity of purpose and use	Rewrite paragraph for better clarity of purpose and use	
FR 037	FRENCH TEXT	Page 10 1 er §	ed	“les décisions étaient historiquement dictées et le nombre de prestataires externes variait en l'absence de stratégie distincte”	“les décisions étaient dictées par l'histoire et le nombre de prestataires externes variait en l'absence de stratégie distincte”	
FR 038	FRENCH TEXT Description du contexte	Page 10	ed	“La nécessité de corriger cette situation à l'aide des meilleurs exemples pratiques existants est admise”	“La nécessité de corriger cette situation à l'aide des meilleurs exemples pratiques existants est admise”	
DE 039	General	Figures (all)	te	Please check and correct all figure numbers.		
UK 040	General		ge	It is strange that although apparently a comprehensive document, it does not indicate how the distances are to be measured, where reference could be made to the	Consider referencing ISO standards	

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				suite of standards developed by ISO/TC 10.....		
DE 041	Introduction	Bullet point 3, after the table	ed	The sentence is incomplete.	The high number of invoices and the  intransparency of the cost and the performance of the procured services...???	
DE 042	Introduction	Fundamenta ls of FM	ed	The sentence "Facility Management cannot be outsourced, only facility services" is confusing and should be discussed again and maybe deleted.		
UK 043	Introduction			This standard includes an introduction of 8-9 pages which appears virtually identical to the introduction to prEN 15221-3. Users of standards are required to purchase standards based on page count and are not going to be very pleased to pay for the same content in two or more occasions.	Proposal. Carry out a fundamental restructuring of the draft standards; shorten the introduction to no more than one page and remove the remainder to an informative annex in one of the draft standards, and cross-refer to it in the other standards	
UK 044	Introduction		Ed	Format of Introduction is different than others three FM Standards	Ensure that formats of all four FM Standards match each other for the Introduction	
UK	Introduction	Page 4 - Fundamenta	Te	'Facility Management cannot be outsourced, only facility services' DISAGREE WITH THIS	Delete last bullet	



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045		Is of FM		STATEMENT. Facility Management can and is outsourced at all levels including ownership of assets by the provider of Facilities Management and FM Services		
UK 046	Introduction	Page 5 - 2nd bullet point under 15221-4	Ge	Refers to "FM products" – is this correct terminology? Or should it be FM Services?	Further discussion required by CEN/TC committee	
UK 047	Introduction	Page 6 - Figure A.1	Ed	Words "FM model: "at the top of diagram needs removing. Title of Figure A.1 needs to have the words "according to EN 15221-1:2006" added to it	Update accordingly...	
UK 048	N/a	N/a		There is no Figure 4		
UK 049	Total Document		Ge	We thought the main purpose / scope of the document was to develop a 'Facility Management square metre'?!? Nowhere in this standard can one find such a measure.	Replace Rentable Floor Area with Facility Management Area throughout the document	
UK 050	Total Document		Ed	The use of British English should be used throughout - not American English	Check spelling and grammar based on British English	

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UK 051	Total Document		Ge	The touch and feel of the whole document is rather messy.	Update contents page to include all Chapters and Sections Insert page breaks where this enhances readability Update the Figures throughout the document (including Annexes)	
UK 052	Total Document		Ge	It would appear that the information relating to “How” to measure space has been removed from this document (i.e. to finished surface at floor level).	Revisit previous drafts and replace agreed words from the working group sessions	
UK 053	Whole document		ed	There seems to be a number of typo's throughout the document		
UK 054	Whole document	Page 21 onwards	ed	Figure 3 citation is incorrect. This has a knock-on effect to all diagrams that follow.		
FR 055	<b>Whole document</b> as well as when used within other projects of standards	Whole document	ed	As decided by the TC, the term “FM product” found within the project of standard 3 should have been replaced by “FM services” unless the service concerned is defined within the project of the standard 4 as a “FM classified service” today defined as a “FM product” (e.g. page 25, 5.4.2, Organising requirements ..) only	The term “FM product” found within the project of standard 3 should be replaced by “FM services” unless the service concerned is defined within the project of the norm 4 as a “FM classified service” today defined as a “FM product” . In final to be replaced by “FM standard or standardised service”	
FR 056	<b>Whole document</b> as	Whole document	ge	The term “product” used within project of standard 4 and consequently within the other projects to designate a	The term “product” used within all the projects of standard to designate a “classified FM service”	

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	well as within the others projects of standards using the term "product"			"classified FM service" is not used in France FM business activities and leads to unnecessary complexity and misunderstanding for no deep reasons (ISO 9001 accept the term "service" to designate a product within specialised areas)	should be replaced by "classified FM service", in fact by "standard or standardised FM services", assuming next remark and change is accepted	
FR 057	<b>Whole document</b> as well as within the others projects of standards using the term "classified"	Whole document	ge	<p>The term "classified" used within project of standard 4 and consequently within 3, 4, and 5 when needed to designate FM services" considered as "standard" or "standardised" FM services, is not the adequate term.</p> <p>Why ? First reason: services, even specific ones will anyway be classified according to the categories defined in standard 4. The strict minimum classification being is a service a standard one ("classified" in the project of standard 4) or is it specific. Consequently the term "classified" will apply to all services. Consequently, the term "classified" does is not defined correctly a standard or standardised service ("classified" in the project of standard 4). Second reason: classified has a second English meaning. Info from Webster dictionary "Classified" :</p> <p>1- a: consisting of classes</p> <p>1- b: divided into classes or or placed in class</p> <p>2- : forbidden to be disclosed outside a specified ring of secrecy for reason for national security; <i>specif</i>: having a particular specific classification"</p> <p>The average FM business persons reading the word</p>	Within all the projects of standards, the terms "FM classified services" should be replaced by "standard or standardised FM services".	

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				<p>“classified” will think of the second meaning and not of the first one. This lead to unnecessary confusion.</p> <p>Consequently the term “standard” or “standardised” facility service should be used</p>		
CH 058	1		ed	Financial assessment – can this be done in metres? Tool for benchmarking – is this standard a tool for it?	...support or serve as a basis for financial assessment and benchmarking	
UK 059	Clause 1			In paragraph 2 delete the word ‘clear’ which is unnecessary. After all the reader would expect everything in an EN to be clearly specified.	Delete ‘clear’	
FR 060	FRENCH TEXT  2.Les processus de support dérivés sont :	Page 9	ed	<p>“Administration (équipement <del>IT</del> de pointe,...</p> <p>Recherche et développement infrastructure <del>IT</del> “</p>	<p>“Administration (équipement <b>IT</b> de pointe,...</p> <p>Recherche et développement infrastructure <b>IT</b>”</p>	
AT 061	3		ed	Terms and definitions should be placed in logical order instead of an alphabetic one, which differs in each language	distance, space, area, volume, room, building, floor, ceiling, roof, wall	
DE 062	3.10		ed	Please delete the word "enclosing".	generally vertical structure which...	

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DE 063	3.10	Note, 1 <sup>st</sup> sentence	ed	Please add a reference to clause B.5, where the interior wall should be explained by a new figure (see comment concerning B.5)	...as well as exterior and interior walls: see B.5	
FR 064	<b>Introduction</b> Page 4	First sentence	ge	This introduction does not fit with it's true intent	This introduction goal is to position the standards 3, 4, 5 and 6 in continuity with the standards 1 and 2.	
FR 065	<b>Introduction</b> Page 4	Fundamentals of FM		The first 3 sentences and the last one are coming from standard 1 the sentences 4 and 5 appears as a marketing text for FM. No reason to have theses sentences	All these sentences and the title should be suppressed.	
FR 066	<b>Introduction</b> Page 4	Basic principles which are used in the drafts	ge	The first 2 bullets are not « principles » but « knowledge»  Number 3 and first part of 4 are an obvious when one elaborate standards and the last part of 4 "example" is not true at least for standard N°3 N° 3 and 4 should be suppressed	Knowledge used within the draft: - ISO 9000-90004 and the guidance papers the cycle of PDCA which stands for Plan, Do, Check and Act	
FR 067	<b>Introduction</b> for all the 4 projects of standards	Whole document	ge	This introduction is part of the 4 projects of standards, could be useful for the future "benchmarking" standard and is said to be suppressed within the final standards. This leads to two questions: 1- What will be the final introduction to be approved ? 2- The pedagogical example contains within the present introduction may be useful for actors not aware of FM, to introduce these FM standards and future ones to them. Should not this example be mentioned within the final introduction and enclosed within an annex in the 4 standards Assuming this introduction will remain one way or an other,	Within the norms 3, 4, 5 6 and future ones (Benchmarking) keep this introduction within an annex. In the new introduction set up a sentence leading the reader to read this annex	

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				comments are proposed below		
UK 068	4.1 and elsewhere			Use correct verb forms, as in CEN Internal Regulations, for example, replacing 'must' with 'should'. Note that 'must' is used 6 times in the standard;	Reword as necessary	
CH 069	4.2		te	The standard goes into the right direction of simplification by not measuring incidental structural components or services installations	Add sentence that non structural components like floor linings or built in cupboards (Fussleisten, Wandschränke) are not to be taken into account. Add a limit (eg. <3%) under which irregularities like window cavities (Fensterinsichten) are not taken into consideration to further simplify measuring	
CH 070	4.2	fig. 1a+b		No window shown	See comment above: add a window in this exemplary picture	
CH 071	4.2			double lines in passage way	Remove	
CH 072	4.2			line representing the raised floor in fig 1a is at first confusing as fig. 1b is two pages later	Add reference to fig. 1b	
CH 073	4.2			hn and hf is used twice with different meanings	Use eg. hna and hnb respectively hfa and hfb and explain when to use which measure; Proposal: highlight (bold) the measures which should be taken in the minimum (cost optimized data collection).	
CH 074	4.2			What is the difference between ceiling and suspended ceiling? Is the term construction height hc clear enough?	Should the terms raised floor height and suspended ceiling height be added to distinguish them from hc?	

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CH 075	4.2	fig. 2		h gross height	The term has different meanings and the same term is used in fig. 1	
CH 076	4.2	fig. 2		Middle and right drawings – these represent a building with an open ground floor	This representation should be highlighted eg. by shifting the columns inwards or drawing a car	
DE 077	4.2	Figure 1, a) and b)	te	Subfigures shall be identified by a lower case letter, e. g. Figure 1 may comprise subfigures a), b), c) etc. [see ISO/IEC Directives — Part 2:2004, 6.6.5.11]	<b>a) Measuring distances on a horizontal plane</b> <b>b) Measuring distances on a vertical plane</b> <b>Figure 1 — Measuring distances</b>	
DE 078	4.2	Note	ed	Please substitute " floor" with "base slab"	NOTE For the lowest storey in the building, gross height has to be measured to the bottom of the <b>base slab</b> (up to the maximum of an ordinary floor).	
DE 079	4.2	3 <sup>rd</sup> last bullet point	ed	Please delete the word "floor".	...or the adjoining land and the bottom of <b>a ceiling or roof</b> situated above it, whereby incidental structural components are not taken into consideration	
DE 080	4.2	Figure 1.b Key	ed	Please substitute "5 floor" with "base slab"	5 base slab	
DE 081	4.2	Figure 1.b Key	ed	Please substitute "6 floor or roof" with "ceiling or roof".	6 ceiling or roof	
DE	4.2	Figure 1, right	ed	In the figure standing right the arrowheads shall end at the	Figure has to be changed.	

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082		part		top of the ceiling.		
UK 083	4.2	Figure 1.c	Ed	States Figure 1, but should be Figure 1.c	Figure should read 1.c as opposed to just 1	
DE 084	4.3	2 <sup>nd</sup> sentence	ed	Please overwork the whole 2 <sup>nd</sup> sentence (Proposal standing right).	Inclined planes such ramps are measured by their vertical projection onto an (imaginary) horizontal plane illustrated; stair flights with a height difference <1,50 m are illustrated at the plane where they start, stair flights with a height difference ≥ 1,50 m are illustrated at the plane where they end (projected <a href="#">upward to the next plane</a> ) <b>"Treppenloch"</b>	
DK 085	Clause 4.3	Measurable area	TE	The measurement of area of floors with sloping ceilings and non standard ceiling heights should be addressed more precisely.	Based on DS 13000 it is suggested to add: "For measures of the area of floors with sloping ceilings and non standard ceiling heights, it should be stated for which ceiling height the area is measured"	
FI 086	5		te	The standard treats the building as one unit. However, often there are situations that the building has several users, thus the area/space is divided.	Include information how to share the area/space to more than one users e.g. for internal floor area the area of interior construction area is divided half for two separate users. These guidelines should be treated for each area type separately, 5.2 – 5.14.	
FI 087	5		te	The standard does not include NET INTERNAL AREA. This is the most used area type e.g. for rented premises and apartment sales in Finland. The net internal area includes the area of partition wall area (as the partition walls can be removed and/or changed) but some areas of the CA are excluded.	Add table 2 where after Internal Floor Area (IFA) the next level is NET INTERNAL AREA. Name the table: Table 2. Hierarchy of floor areas in the building, net internal area. The Net Internal Area includes Primary Area,	



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					<p>Amenity Area, Partition Wall Area and parts of Circulation Area. Net Internal Area excludes Technical Area and parts of Circulation Area. The Circulation Area should be divided into Horizontal Circulation and Vertical Area. The Vertical Circulation Area should be divided into Stairwells and Lift Wells. The Horizontal Circulation Area and Stairwells are included to the Net Internal Area. Lift wells are excluded.</p> <p>In Finnish practise the area of stairwells (within one apartment/premises) is calculated into the area in n-story premises only n-1 times. The area below the stairs in the first floor is not calculated into the area except in the case if the area which is above 1600 mm is of height more than 2200 mm.</p> <p>Show e.g. by color which components are included to the Net Internal Area.</p>	
FI 088	5	Table 1	te	The name of the table 1 should be changed to describe the difference between table 1 and table 2 (new).	Change the name of the table 1 to: Hierarchy of floor areas in the building, net floor area.	
FI 089	5		te	The standard treats only that level where the well or void exists.	Add rules how to treat the area on the level underneath the voids or wells.	
FI 090	5		te	The standard does not include how to treat sloped roofs.	Include at least general rules how to treat area under sloped roofs.	
FI 091	5		te	The standard does not include how to determine the inner limiting face of the exterior wall.	Add how to determine the inner limiting face of the exterior wall	
UK	5	Figures	NEW	Figures are not very professional and Figure	Use floor plates of a realistic building and	

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092				numbers are not in order	update the Figures numbers throughout Chapter 5	
UK 093	5	Figures	NEW	From the Figures throughout Chapter 5 it is not clear what that the coloured areas represent	Insert legend or to state in the text what the coloured area represents	
UK 094	5	Lists	NEW	Lists to highlight what is included under which Area are still very messy and not consistent throughout (see difference between page 20 and page 23).	Update all lists to be consistent	
FR 095	<b>Introduction</b> Page 5	Second §	ge	These drafts have also strong linkages with the FM model of EN 15221-1. Add EN 15221-2	These drafts have also strong linkages with the FM model of EN 15221-1 and EN 15221-2.	

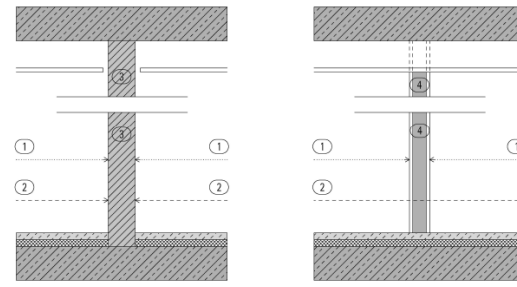
1	2	(3)	4	5	(6)	(7)
MB <sup>1</sup>	Clause No./ Subclause No./ Annex (e.g. 3.1)	Paragraph/ Figure/ Table/ Note (e.g. Table 1)	Type of comm ent <sup>2</sup>	Comment (justification for change) by the MB	Proposed change by the MB	Secretariat observations on each comment submitted
FR 096	Introduction Page 5	Third §	ed	which can be used in “REAL ESTATE” or for standard Benchmark purposes. Why capital letters for REAL ESTATE and Benchmarking What is a “standard” benchmark, qualification not needed	which can be used in “real estate” or for benchmark purposes.	
FR 097	Introduction Page 5	Message prEN 15221-3	ge	The demand, requirement of the needs of an organisation are transformed into the steps and measures to act on deviation.	Through the described steps, the needs and demand of an organisation are transformed into requirements and objectives to be reached, as well as, after implementation, measurements of the results and actions to limit deviations activated.	
098 DK	Clause 5.1	Page 18. Table 1	TE	Distinction between unrestricted and restricted areas seems unnecessary.	It is recommended not to include the distinction between unrestricted and restricted areas. If it is included, the concepts must be defined and the difference established using examples.	
AT 099	5.1	Table 1	ed/ge	According to 5.8 RFA must include NFA, but RFA depend on national regulations and individual contracts. Therefore it shouldn't be part of the standard	Delete the note with RFA	
CH 100	5.1	tab. 1	ed	see 5.8 (note raised a to RFA)	Better refer to 5.15	
CH 101	5.1	tab. 1	ed	RTA and UCA	Include explanation or a reference to the chapter where these terms are explained	
CH 102	5.1	tab. 1	ed	Dotted lines showing possible RFA	Move to the left from NRA to NFA	
CH	5.1	tab. 1	ed	In B.2 the NFA is split into A, B and C	Add a reference to B.2 in the Note as illustration	

1	2	(3)	4	5	(6)	(7)
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103					using the example NFA	
CH 104	5.1	tab. 1		Categories of areas – hierarchy of floor areas	Hierarchy of categories of floor areas (?)	
DE 105	5.1	Note A, B, C	ed	Please substitute "spaces" with "areas"	A Areas which... B Areas which... C Areas which...	
DE 106	5.1	Note C	ed	Please delete the word "entirely"	C Areas which <b>are not covered</b> , but...	
DE 107	5.1	Table 1, and the whole document	ed	Please substitute "Total Level Area" with "Level Area"		
DE 108	5.1	Table 1	ed	Please substitute "Rentable Floor Area" with "Floor Area"		
UK 109	5.1	Table 1	NEW	Figure claims that Rentable Floor Area = Net Floor Area, but the line says Rentable Floor Area = Net Room Area	Need to correct line to Rentable Floor Area = Net Floor Area	
UK	5.1	Paragraph 5	NEW	The application of the framework given in table 1 is	Insert clause 5	

1	2	(3)	4	5	(6)	(7)
<b>MB<sup>1</sup></b>	<b>Clause No./ Subclause No./ Annex (e.g. 3.1)</b>	<b>Paragraph/ Figure/ Table/ Note (e.g. Table 1)</b>	<b>Type of comm ent<sup>2</sup></b>	<b>Comment (justification for change) by the MB</b>	<b>Proposed change by the MB</b>	<b>Secretariat observations on each comment submitted</b>
110				illustrated in an example in clause 5... where is clause 5?!?		
111 DK	Clause 5.2	Page 20.	ED	List must be edited. The text "Here follows..." is part of a list.	Delete a)	
UK 112	5.2 TLA	Page 20		Bullet point "a" - first item is not part of the list. Presumably the list would start with "Voids, atriums..."		
CH 113	5.3		ed	The Key to the figures is to be found on the next page	Try to fit the key on the same page	
UK 114	5.3	1st paragraph	Ed	Sentence "Separate auxiliary buildings have to be considered on their own merits." has been deleted	Reinsert as follows "Separate buildings have to be measured independently"	
UK 115	5.5	1st Paragraph	Ed	There are a number of typos in the first sentence: "Exterior Construction Area is a measured area,consisting of the exterior walls of a building envelope finished surface. This also includes	Reword as: "Exterior Construction Area is a measured area consisting of the exterior walls of a building envelope finished surface. This also	

1	2	(3)	4	5	(6)	(7)
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				additional bracing for exterior walls, for example flying buttresses and seismic supports .”	includes additional bracing for exterior walls, for example flying buttresses and seismic supports.”	
CH 116	5.8		te	Non-structural walls	How to decide if a wall is structural in older buildings?	
CH 117	5.8		ed	RFA is equal to NFA	Refer to 5.15: ... could be ...; add that the rentable area is individual and to be determined in the rental contract while the NFA could be used as the standard measurement for benchmarking etc.	
UK 118	5.10	Title	Ge	The group believe that the word “Room” is not a good term for this space categorisation, as it makes the reader think of a room rather than several rooms. Therefore another term needs to be considered for this categorisation. Suggestion = Net Available Area (NAA)?	This comment was made and agreed at TC, WG6 needs to agree/discuss suggested alternative	
FR 119	Introduction Page 6	Drawing	ge	KPIs and SLAs appearing within the draft do not fit any more with the standard 3	NO PROPOSAL	
DE 120	6.1		ed	The form of a definition shall be such that it can replace the term in context. Additional information shall be given only in the form of examples or notes. [see ISO/IEC Directives — Part 2:2004, D.1.5.3]	Please check and correct this.	

1	2	(3)	4	5	(6)	(7)
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UK 121	6.1.1	Definition	Ed	Definition of External Area in 6.1.1 is NOT correct	Revisit previous drafts and replace agreed words from the working group sessions	
CH 122	6.3		ge	External areas are classified as ...	Move into Annex C as examples in line with the other examples	
FR 123	Introduction Page 10	Guidance how to achieve, .....	ge	"Guidance how to achieve, improve and measure quality in FM." One should starts by measuring	"Guidance how to measure, improve and achieve quality in FM."	
FR 124	Introduction Page 11	Terms product and service... Third §	ge	'Service' as part of the definition 'product' is used in the general quality management context as a time-perishable, intangible experience performed for a customer acting as co-producer.  « intangible experience » cannot be understood	'Service' as part of the definition 'product' is used in the general quality management context as a time-perishable, activity performed for a customer acting as co-producer	
FR 125	Introduction Page 11	Terms product... Last §	ge	"According to the existing FM model in standard EN 15221-1 is decided that facility services are only used on operational level. The terms «facility services» and «classified facility products» are not used on tactical and strategic level."  Why ? e.g. a co-ordination service at a tactical level IS a facility service	Suppress this abstract , difficult to understand and not always true §	
FR 126	Introduction Page 12	Term product... Last §	te	"The classification of 'facility services' to 'classified facility products' is described in chapter 5.4.2. After these chapters the terms 'facility services' and 'classified facility products' are used in this standard."	"The classification of a 'facility services' into 'classified facility products' is described in chapter 5.4.2. Within standard 3 the terms 'facility services' and 'classified facility products' are accordingly"	

1	2	(3)	4	5	(6)	(7)
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				The above explanations are not clear, the introduction of two terms for the same object is very confusing. Within standard 3 the only term to be used is « Facility services », mentioning that within the ISO context it means « facility product »  NB THIS RULE AS NOT BE APPLIED (See above)	Classified has also to be changed to “standard” or “standardised” see above.	
FR 127	Page 15	Figure 1 A	Te	page 15 il manque une indication supplémentaire au titre Figure 1a - mesure de distances sur un plan horizontal - <b>vue de dessus</b>	<b>English and French versions:</b> <b>Add seen from above to the title of figure 1.a</b> <b>Figure 1.a — Measuring distances on a horizontal plane <u>seen from above</u></b>	
CH 128	B.2	fig. B.2		Example of a balcony – distinguish better from regular example	Building used as an example with balconies added	
DE 129	B.4	Figure B.3	te	Please include the dimensions.	Dimensions in meter	
DE 130	B.5	Neu figure	ed	Please add a new figure (like proposed standing right)	 <p>KEY</p>	



1	2	(3)	4	5	(6)	(7)
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					1 net-room area 2 net-floor-area 3 structural interior wall 4 non-structural interior wall	
FR 131	FRENCH TEXT Tableau C.4 Exemples de subdivision de Surface principale	Page 53	ed	espaces pour l'archivage	Espaces pour l'archivage	
AT 132	Annex A	Table A.1	ed	The horizontal line in column NRA+TLA has to be put one line above and has to reach to the end of the table	Correct the line	
AT 133	Annex B	Figure B.4	te	The light grey part of the room could also be horizontal circulation area, if it is part of a corridor	Key: primary area or horizontal circulation area	
AT 134	Annex B	5	ed/te	WG6 proposed in accordance with TC explanations for construction and partition walls. They are missing in the draft now.	Add the proposed subclause B.5	
AT 135	Annex C	Table C.4	ed/te	Accommodation should be replaced be residence, to include the private living areas. More examples are requested	Residence instead of Accommodation Add: students hall, prison cell, old peoples home	
UK 136	Annex C	Tables	Ge	Table titles are duplicated	Delete titles above tables	

1	2	(3)	4	5	(6)	(7)
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NL		T.1	Ed	The line indicating the left endpoint of RFA is in the wrong place: should be by NFA, not NRA.	Move left to ICA-PWA border.	
NL		F 1.a	Ed	b_G1 & b_G2 are not in current figure, while l_G1 & l_G2 are. This should be made consistent: both or neither.	Add b_G1 & b_G2.	
NL		F 1	Ed	The third figure, following fig. 1.a and 1.b, is labelled fig. 1. Presumably this should be fig. 1.c	Amend to Figure 1.c.	
NL		F 1	Te	In fig. 1, the second and third examples have a space classified as covered area, i.e. class B. The second example has an earthen floor. This is correct according to §5.1, but is it as intended? (See also comment on §5.1.)	If not intended, remove '5' label from middle example.	
NL	4.3		Te	Concerning the projection of a sloping floor: the direction of projection does not affect the returned measurement value. Remove the relevant comment to avoid confusion.	Remove "; the upper plane [...] lower than 1,5 m".	
NL	4.4		Te	It would be very desirable to manage to expand the section on volumes in this session. We believe only a small modification of §4.4 is required for this, as most definitions are already in place. Proposal:  "Volumes are measured by their actual dimensions. Inclined planes, whether floors or walls, define inclined bounds to the volume.	Replace §4.4 with text as described.	

1	2	(3)	4	5	(6)	(7)
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				Gross volumes are determined by the gross distances, net volumes are determined by the net distances.  Note that Non-functional Level Area concepts such as voids do not apply here. These are the result of traditionally storey-based area measures sectioning multi-storey spaces. When measuring volumes, a multi-storey space is measured as a single volume."		
NL	5.1		Te	Implicit definition of floor level: "the height level of the top of a finished floor". Perhaps make definition explicit in §3, Terms & Defs.? Also note: this defines floor level as determined by physical floor elements, i.e. not equivalent to storeys, which are conceptual elements which may contain varying physical floor levels. (See also comments on §5.1 and §B.4.)	Move definition of floor level to §3, Terms & Defs.	
NL	5.1		Te	"Floors may be storeys which are either completely or partly under the ground as well as above the ground." a) This is not a restrictive statement, so its purpose is clarification only; is this something that needs to be clarified? (Honest question -- are there regions or disciplines where people would otherwise not assume this anyway?) b) Though it is arguably loosely correct due to the use of "may", floors have been defined as the physical building elements, and a storey can contain multiple different floors. c) Note that storeys have not been defined in §3, nor I believe anywhere else (but see also comment on §B.4).	Remove sentence entirely or amend to "Storeys may be either [...]".	
NL	5.1		Te	"Wall openings in interior and exterior walls are also measured by the vertical projection of their outer limits onto the horizontal plane [...]" Perhaps it should be clarified that "the outer limits" refers to the outer limits at	Amend to e.g. "[...] their outer limits at floor level onto the horizontal plane [...]"; Or remove "are also [...] plane and".	

1	2	(3)	4	5	(6)	(7)
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				floor level. Otherwise a non-vertical wall could lead to area being double-counted as room (measured at floor level) and wall (measured by projection of the top of the inward-leaning wall opening). Alternatively, as wall openings are counted as part of the wall area and thus effectively ignored, the whole could be rephrased in those terms, removing any possible confusion.		
NL	5.1		Ed	A/B/C: The important distinction between spaces of class A, B, and C is made almost as an aside. Suggest this needs to be more prominent.	Greater prominence for A/B/C; regular font size?	
NL	5.1		Te	A/B/C: Also propose a comment to the effect that references to buildings and areas without further specification refer to the class A spaces only, unless B/C are explicitly mentioned.	Add comment as described.	
NL	5.1	F 1	Te	The current definitions of classes B and C both require only a single side of a space to be closed, with no requirement on the floor of a space. By this rule, certainly the area on a flat roof must be counted in class C, whether it is intended to be walked on or not. Strictly read, it is even required that the area over a sloping roof, or the floating area next to a vertical exterior wall be counted as class C. Suggest something along the lines of a constructive floor being required (though this could still class a flat roof as C). Another option could be a requirement such as 'the intent to be used as a floor': this would allow certain packed-earth floors which would otherwise be excluded, and would remove flat roofs. A disadvantage there is the ambiguous 'intent'. Alternatively, rephrase with 'room' instead of 'space'? This would introduce link to the building, and accessibility.	Amend to require e.g. a constructive floor or intent to be used as a floor? Rephrase with 'room'?	
NL	5.8 5.15	T.1	Te	RFA=NFA: the NL mirror committee is of the opinion that	Amend §5.8 and §5.15 as described.	

1	2	(3)	4	5	(6)	(7)
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				<p>this should be presented as an equivalence, not a suggestion. §5.8 and §5.15 both define RFA and do not agree on this. Additionally, suggest that the explanatory text in §5.15 is not necessary in a standard. Proposal:</p> <p>(a) Reduce the comment in §5.8 to a reference: "According to this standard, the Rentable Floor Area (RFA) is equal to the Net Floor Area."</p> <p>(b) Amend §5.15 to: "The Rentable Floor Area (RFA) is equal to the Net Floor Area. This includes all concepts such as rentable, lettable, leasable, equivalent rent, and corresponding terms. This with a view to maintaining comparability based on costs and square metres. Any combination of the above categories can be rented or leased."</p>		
NL	5.10		Te	<p>Proposed addition to the ¶ on Restricted/Unrestricted Area:</p> <p>"A minimum height requirement of 1,5 m or 1,9 m is an example of a rule which may often be used. It should be noted that Restricted Areas are measured areas subtracted from NRA. To maintain comparability across organisations with differing RA rules, the full NRA must always be available."</p> <p>Reasons: (a) we noticed that many (Dutch) readers believe they read a 1,5 m measurement height in the standard, though it is not there; (b) some organisations appear to hope to implement RA rules such that they do not have to measure certain difficult areas; this would endanger comparability, as it would not be possible to determine whole NRA values.</p>	Add text as described.	

1	2	(3)	4	5	(6)	(7)
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NL	5.10 5.11 C	T 1 F 12 T C.1	Te	<p>Technical spaces that are not rooms: As a component of NRA, only spaces that meet the definition of a room should be measured under TA. This results in significant 'left over area' under NFA that is not part of NRA nor of PWA. Alternatively, such non-room spaces could be measured under TA despite not meeting the definition of a room. Fig. 12 suggests this is the approach currently taken: the building areas shaded as being TA do not meet the definition of a room. However, Table C.1 explicitly mentions "Man-sized supply shafts and ducts [...]", following the strict rule. Both approaches have problems and benefits.</p> <p>This also raises the question whether there are other such spaces that fall outside both PWA and NRA.</p>	For discussion.	
NL	5.10 5.11 C	T 1 F 12 T C.1	Te	Whether or not TA is restricted to rooms, it must certainly measure spaces rather than devices. This is explicitly stated in §5.11: "The Technical Area is the portion of the Net Room Area taken up by <b>the rooms</b> for all mechanical installations [...] and electrical installations [...]." (emph. mine.) However, the examples in various lists still name many installations themselves. Is there a danger of this causing confusion?	Consider injecting "rooms for" at suitable points in various lists.	
NL	5.12		Te	There is a strong demand for the distinction between horizontal and vertical circulation area to be explicitly addressed in the standard. Propose the addition of the following new paragraph in §5.12: "Circulation Area may be subdivided into Horizontal and Vertical Circulation Areas." We suggest against modifying Table 1 to include this visually, to maintain clarity.	Add paragraph as described.	

1	2	(3)	4	5	(6)	(7)
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NL	6		Ge	Please see attached proposal for §6.1, implementing or replacing the majority of the earlier NL comments on §6.		
NL	6		Ge	We feel §6 would benefit from being clarified with some examples.		
NL	6.1 6.2		Ge	<p>Some general comments on these two sections:</p> <ul style="list-style-type: none"> <li>- At cursory reading there appear to be a number of equivalent terms (this is less so after detailed reading);</li> <li>- There are a number of unclear or subjective terms used (e.g. "main storey");</li> <li>- Some terms refer to all buildings on a plot, others to single buildings; it is not always clear whether the choice is intentional or by accidental choice of words;</li> <li>- The term "ground level" is used with the meaning 'the height level of the ground', but in other terms possibly referring to the storey 'ground floor';</li> <li>- Some terms are dependent upon the construction phase (e.g. "finished state", "intended or used"); this seems unnecessarily complex and is not done elsewhere in the standard;</li> <li>- This chapter deals with exterior area, but the distinction between class A spaces and class B/C spaces of a building is not made (possibly in 6.2 as NFA, though not explicitly);</li> </ul> <p>In part due to the above points, many of the terms individually seem less clear than they should be, as does the section as a whole. We attempt to provide some amendments in the following comments, but admit to not always understanding the intent of the original definitions.</p>	Review and clarification of sections 6.1 & 6.2.	

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				See also the attached figures.		
NL	6.1		Te	Some terms concern all buildings on a plot area, others concern only one building. This should be made more clear, particularly where terms become equivalent in the case of a single building on a plot. We propose all terms should be written for a single building and any redundant terms removed, with a comment in plot area that one can measure at the level of a single building or over a specified set of buildings.	Rephrase all in terms of a single building; add comment as described.	
NL	6.1.2		Ed	Plot area: this seems the primary definition from which the others follow -- move to first?	Move to be 6.1.1.	
NL	6.1.2		Ed	Built & un-built area: only these components are currently defined under plot area, not separately under §6.1. Suggest more consistent to move.	Move to two explicit definitions under §6.1.	
NL	6.1.2		Ed	Following from the previous comment, only these components are mentioned in the plot area paragraph: "Plot area can be divided into built area and un-built area." Suggest more consistent to remove.	Remove built/un-built area comment.	
NL	6.1.2		Te	Built area appears to be equivalent to the sum of all building envelopes within a plot area. Perhaps it would be clearer and safer (redundancy) to define it in these terms.	Redefine built area in terms of building envelopes.	
NL	6.1.2 6.1.3		Te	The determination of two terms, built area and site area, is dependent upon the state of completion of buildings. We propose that this is already determined by the measurement question: one decides to measure either the current state of a building (under construction, in use, or in ruins), or a design for its future state.	Remove phase-dependent clauses: 6.1.2: "in their finished state"; 6.1.3: "in so far as this is intended or".	



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				(One exception to this could be a division of plot area into areas allowed and disallowed for development according to e.g. planning regulations; this, then, has nothing whatsoever to do with any specific building which may be on the plot, and so has no relation to the other measured areas.)		
NL	6.1.3 6.1.4 6.1.5		Te	Site area appears to concern all buildings whereas site area above/below ground concern single buildings. This seems inconsistent. In general, we question whether there is any special relation between site area and the above/below ground areas: should the name of the latter two be changed? Perhaps building area above/below ground, in line with building footprint, building envelope.	Clarify.	
NL	6.1.3		Te	Site area: unable to determine the intent of this definition.	Clarify. Remove?	
NL	6.1.4		Te	Site area above ground: unable to determine what the intent of this definition is. Appears to define an empty set unless the ground floor is not a "main storey". Can it be rewritten in line with 'Site area below ground'?	Clarify.	
NL	6.1.4		Te	Site area above ground: "[...] in so far as this area is situated within the built area." -- all portions of a building are necessarily part of the built area, as that is how built area is defined.	Remove "in so far as this area is situated within the built area".	
NL	6.1.4		Te	Site area above ground: "Main storey": this term is undefined and seems rather subjective (we have court buildings where the first main storey is arguably underground). Could this be replaced with 'ground floor'?	Replace "main storey" with "ground floor"?	
NL	6.1.5		Te	Site area below ground: "[...] entirely below the ground	Amend to "[...] entirely below the ground floor and below ground level."	

1	2	(3)	4	5	(6)	(7)
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				level and below the ground." Terms are equivalent? Propose use of "ground floor" to refer to the storey, if this is the intended meaning.		
NL	6.1.7		Te	Building envelope: "[...] is projected below the lowest point on a horizontal plane": the position of the horizontal plane is irrelevant for the returned measurement values.	Remove "below the lowest point".	
NL	6.2		Ed	§6.2 only contains a more detailed definition of §6.1.1, external area.	Move to 6.1.1, external area.	
NL	6.2		Ed	Rephrase to singular in line with 6.1 (e.g. "External area includes [...]").	Rephrase to singular.	
NL	6.2		Ed	The areas in the second sentence are included in the 'not- footprint' area in the first sentence, therefore "also" seems incorrect. Possibly also rephrase to emphasise non- inclusion of external NFA.	Remove "also" from "They include also [...]".	
NL	6.2		Te	Is the NFA here equivalent to class B/C spaces at ground level? If so, rephrase in those terms.	Rephrase NFA to class B/C.	
NL	6.2		Ed	Covered area is not mentioned in §6.1.3? Perhaps §6.1.4 is meant?	Clarify.	
NL	A		Te	Annex A should be normative not informative.	Amend to normative.	
NL	B.2		Te	"Balconies are therefore part of the uncovered net floor area." -- unless there is another balcony on the floor above.	Amend to "These balconies [...]".	
NL	B.4		Te	Implicit definition of floor level, a) in appendix not main	Replace floor level with storey and move definition of storey to §3, Terms & Definitions	

1	2	(3)	4	5	(6)	(7)
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				body, b) contradicting implicit definition in §5.1. Suggest formal definition of 'storey' for this meaning, and moved to §3, Terms & Definitions		
NL		Figure		Attached is a figure of Components of Plot Area under the current definitions and a figure of Interesting consequence of the current Site Area Below Ground definition		
NL			Te	<p>Concerning the comments submitted by Norway, which were able to be previewed by the NL mirror committee:</p> <p>(a) Sloping floors: §4.3 seems to address this sufficiently (sloping floors are measured in horizontal projection).</p> <p>(b) Balconies: we are unclear on what the precise question is. Balconies fall under B or C, and are measured as such.</p> <p>(c) Sloping ceilings: the comment is incorrect in the statement that 1.5 m is used as measurement height in the standard; the height used is floor level (0 m). If an organisation wishes to measure the portion of their spaces with a net height of 1.90 m, the restricted area mechanism can be used.</p>		
						Below are the Comments of National Mirror Committee 35120201 which has developed the NEN 2580

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NsC			Ge	<p>This standard has been developed by a TC, that was raised to develop standards on FM. prEN 15221-6 goes beyond the lines of FM.</p> <p>This standard is developed for users of real estate but has great consequences for the property owners and private owners. Nevertheless, in the Netherlands they were not involved or invited!!</p> <p>And that is a remarkable conclusion.</p> <p>We have great difficulty to the fact that a TC, raised on FM, decides about a standard such as prEN 15221-6, where this standard is of great importance of and influence on the property owners in the Netherlands.</p>	We expect an invitation from the Dutch NC or CEN/TC when, in future, this standard will get a broader context (e.g. volume; pay attention to our comments on this subject later in this note).	
NsC			Ge	<p>In the Netherlands we use NEN 2580 for space measurements of real estate. This standard had a first edition in 1990 and has become a well known standard during the years. It's a standard for both new and existing real estate. During those years we made several changes, most of them to make the standard workable for all parties concerned.</p> <p>NEN 2580 has several exceptions, on different issues. With these exceptions it's possible to make a quantity survey within reasonable time and costs.</p>	Some of these exceptions are possible on the levels of restricted/unrestricted areas on NFA. We assure you that we will use every possibility in prEN 15221-6 to subdivide. By doing this, the practical changes for owners and clients will be as little as possible.	

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				In prEN 15221-6 there are no exceptions like in NEN 2580. We estimate that it will take more time and therefore higher costs, to set up a quantity survey, especially for existing real estate, where we have to measure 'everything'.		
NsC			Ge	A part of NEN 2580 is part of the Dutch legislation. Introducing another standard will include an A-deviation on prEN 15221-6 for the Netherlands. Terms and definitions of the standard don't match with Dutch legislation.	Be aware that this will have an impact on the date of withdrawal (dow) in the Netherlands	This comment is basic for A-deviation
NsC			Ge	<p>During the last years parties concerned in the Netherlands have given great attention to NEN 2580.</p> <p>In 2009 NEN 2580 was part of a course for real estate brokers. (approximately 5000 real estate brokers).</p> <p>It wasn't just a theoretical course, but above all a course how to use this standard.</p> <p>It's hard to explain, to these professionals as well as to there clients, that within 2 years there is another standard, with other terms and definitions and therefore another outcome!</p>	<p>It is clear to us that our NEN 2580 has more exceptions and details than this prEN 15221-6. Above this, the use of NEN 2580 in the Netherlands is of great importance to property owners and – users (e.g. residents).</p> <p>To make sure that this new standard is being used by all parties, we want a maximum time for the 'dow'.</p>	

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NsC			Ge	<p>Over the years the development of NEN 2580 has contributed to trust in the market on this issue. Based on NEN 2580, a quantity survey offers transparency and trust for those who are involved.</p> <p>Trust and transparency have to be based on a standard which can be explained on a unambiguous way. In the Netherlands, stakeholders are used to a more detailed and complete standard. On several subjects, this European standard doesn't have this kind of details.</p> <p>For this, there are great consequences for preparing a unambiguous and readable quantity survey with equal expressiveness as NEN 2580.</p> <p>This confidence of the market shouldn't be underestimated!</p> <p>If participants don't see the value of this standard, use of the standard will be much less then expected!!</p>	<p>Make sure that the European standard is complete and unambiguous. Delete the subjects where it's not possible to realise these aims within this period.</p> <p>(e.g. Volume).</p> <p>Quality of this standard is part of the</p> <p>quality improvement of the service one delivers!!!</p>	
NsC			Ge	<p>All leases of property owners are based on the outcome of measurements based on NEN 2580. All of these quantity surveys will have to be customized!! This will cost a fortune!</p> <p>Assuming that NFA/RFA (prEN 15221-6) = VVO (NEN 2580), it will cost a lot of persuasiveness in explaining why, when using NEN 2580, a technical area isn't part of the VVO, but when using prEN 15221-6 it is!</p> <p>Remarkable fact is that these technical areas aren't accessible</p>	<p>Make a difference amongst these terms, e.g. by introducing a term as</p> <p>"E-RFA"?</p>	

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				for users, but they do have to pay for it.		
NsC			Ge	<p>During the last months we have had, as NsC, several meetings and contacts with experts, involved in this European project.</p> <p>These contacts have made it clear to us that, up to this day, even these experts give sometimes a different explanation on our questions or phrases on this standard. It shows us that this standard isn't clear to all parties involved.</p>	<p>Prevent that different users in different countries give a different interpretation on this standard, otherwise the effect of this standard will be close to zero.</p> <p>Make sure that the European standard is complete and unambiguous. Delete the subjects where it's not possible to realise these aims within this period.</p> <p>(e.g. Volume).</p> <p>Quality of this standard is part of the</p> <p>quality improvement of the service one delivers!!!</p> <p>Make a further clarification on terms and definitions and introduce a second</p> <p>enquiry period. During this period there will be enough time to really involve the great property owners in this subject.</p>	
NsC			Ge	<p>The Dutch NsC has had several meetings on this subject.</p> <p>Especially the fact that property owners were not involved in the national mirror committee was a great difficulty. Including the fact that <b>users</b> of their property <b>would decide</b> about their</p>		

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				<p>property.</p> <p>During the last meeting, on the 3<sup>rd</sup> of march 2010, some members of the Dutch NsC wanted to say 'NO' to this European standard.</p> <p>This vote was not unanimously!</p>		
NsC			Ge	<p>prEN 15221-6 uses various terms which have a great linguistic similarity with terms from NEN 2580 but are nevertheless technical different.</p> <p>E.g. VVO (Verhuurbaar Vloer Oppervlak, NEN 2580) is similar to Rentable Floor Area (RFA, prEN 15221-6).</p> <p>Using these terms will cause a lot of confusion, amongst users and clients, and therefore we expect great resistance amongst all participants.</p>	<p>Make a difference amongst these terms, e.g. by introducing a term as</p> <p>"E-RFA"?</p>	
NsC			Ge	<p>The outcome of this standard can be used for benchmarking.</p> <p>In order to benchmark you have to measure everything within the scope of a benchmark. The origin of a benchmark is commercial property. Housing was never the issue.</p>	<p>Make clear to what this standard is</p> <p>applicable, only commercial property. Nothing more, nothing less.</p>	



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				<p>In the Netherlands interest representatives of housing were never</p> <p>Involved. Based on NEN 2580 we don't measure everything for housing. So this standard, if also applicable for housing, will have very great influences on this market in the Netherlands, on both the individual owner and the professionals.</p>		
NsC	Introduction	Page 4	Ge	<p>The last sentence of this page says '...which <b>can be</b> used in 'REAL ESTATE' or for....'</p> <p>The words '<b>can be</b>' suggest that it's a choice for each participant in real estate whether they use this standard for space measurements or not.</p> <p>So prEN 15221-6 is a standard for FM but not for property owners??</p> <p>This will cause great discussions between these participants. What is the basis of the lease between those participants? The European standard or the national standard on this subject.??</p>	Make a clear choice.	
NsC	Introduction	Page 11	Ge	<p>The first sentence after 'Introduction of the standard of Area and Space measurement' says that this standard must be used for a consistent European approach to Facility Management..</p> <p>This suggests that there is no other use than FM. So, no use for property owners?</p>	Make a clear choice.	
NsC	1		Ge	The first sentence implies the use of this standard for FM. So	Make a clear choice.	

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				there is no use in a broader context?		
NsC	4.4		Ge	<p>The definitions of gross volume and net volumes are too simple.</p> <p>Figure 1.b, page 16, shows gross height, including the construction height of floor or roof. There is no definition given of 'construction'</p> <p>Is this e.g. with or without isolation?</p> <p>There isn't any clarification on sloping roofs! What do we use in those cases?</p>	<p>Leave volumes out of this standard.</p> <p>There is too little information to make it a workable part of this standard.</p> <p>A consistent and complete standard is the base of a useful standard.</p> <p>Without this, the use of the standard on items such as volume will be minimal</p> <p>And that is not the aim of this standard, is it?</p>	
NsC	Annex B		Ge	A informative annex??	Make this annex B normative.	
						The comments below are from the Dutch Network of Real Estate Companies
NL				The next comment of IVBN below is not addressed in the standard committee plenary 351,260 "Facility Services" and this means that on an otherwise one a NL position should be adopted. The next comments of IVBN have been reviewed by Fred Kloet, Albert Timmerman and Jeroen Burger and have been sent to the secretary of CEN TC 348, mw. Wiene Wijnstra		The next comment of IVBN below is not addressed in the standard committee plenary 351,260 "Facility Services" and this means that on an otherwise one a NL position should be adopted. The next comments of IVBN have been

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				<p>The comments of the IVBN repeat three concrete proposals. These are addressed once, for efficiency:</p> <p>(1) (a) Postpone the introduction of the standard to (b) broaden the scope and (c) involve more stakeholders (specifically property owners);</p> <p>(2) Remove RFA from the standard, or at least make it optional;</p> <p>(3) Restrict the scope to FM.</p> <p>These three concrete comments form is for IVBN account, and does not represent the views of the NEN 2580 standard committee. Neither the 'Rijksgebouwendienst' (The dutch government building service) nor the experts Fred Kloet, and Albert Timmerman representing NEN, support the IVBN in removing the RFA and to put standards to limit the scope to the scope of FM. We believe in an EN standard with the RFA section within. We believe area and space measurement is in itself- as a matter of fact - beyond the scope of FM.</p> <p>Addressing these concrete proposals in reverse order:</p>		<p>reviewed by Fred Kloet, Albert Timmerman and Jeroen Burger and have been sent to the secretary of CEN TC 348, mw. Wiene Wijnstra</p> <p>3) Secretariat of CEN/TC 348 will look for resolution with scope of prEN 15221-6.</p>

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				<p>(3) Real estate parities in Holland were initially (2008) also unclear on the scope issue: is this standard's applicability limited to FM or not? The confusing text appears to be the result of prEN 15221-6 being a part of the EN 15221 set of FM standards. CEN regulations require the introductory text to be the same for each standard. However: by the same CEN regulations, these texts cannot in actual fact limit the scope to FM at all. Thus the proposal to reduce scope is not possible under CEN regulations. (Proposal expected to be ruled invalid.)</p> <p>If the standard were stand-alone the text could be changed to explicitly broaden the scope, but there was little eagerness for this drastic step. Nonetheless, given the persistent confusion regarding scope, we can use these comments to propose to the WG to request of the TC some clarifying paragraph explicitly expanding the scope for part 6.</p> <p>(2) The purpose of the standard is to enable pan-European comparisons. A hard definition of RFA is essential for this.</p> <p>(1) Naturally with more time, the standard will be able to be improved: this is always the case. In principle, more stakeholders being involved will also improve the standard. The question is at what point the losses due to postponement outweigh the potential gains.</p> <p>Many comments seem to come down to the sentiment simply that things will change with the new standard, that this is</p>		

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				<p>necessarily bad, and therefore the adoption should be postponed. In addition to the logical flaws in this argument, we feel it is unfortunately short-sighted, and cannot in-and-of-itself be a reason for postponement.</p> <p>The above addresses the proposals of the IVBN's comments. A few details in their comments have been addressed individually following the relevant comment.</p>		
IVBN A				The statement that Restricted Areas are exceptions which do not need to be measured is incorrect. RA is a measured area subtracted from a measured NRA.	Valid comment. Issue has already been recognised, no changes expected at this stage.	
IVBN B			Ge	NEN 2580 is part of the Dutch legislation. Introducing another standard will include an A-deviation on prEN 15221-6 for the Netherlands.	Maximize period to keep up the existing NEN 2580 next to the prEN 15221-6 to at least 3 years after introduction.	
IVBN C			Ge	<p>prEN 15221-6 uses various terms which have a great similarity with terms from NEN 2580 but are nevertheless different.</p> <p>E.g. VVO (Verhuurbaar Vloer Oppervlak, NEN 2580) is similar to Rentable Floor Area (RFA, prEN 15221-6).</p> <p>Using these terms will cause a lot of confusion, amongst users and clients, and therefore we expect great resistance amongst all participants.</p>	Postpone the introduction and try to come to a broader scope and support in a joint effort with real-estate owner- and investor organizations	

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				The second issue is not relevant (and arguably incorrect); the first issue is relevant, and is true for any major change. We believe professionals will readily find ways to clarify things to their advantage.	Comment partially valid. We therefore propose to clarify the definition in a way that all sorts of lettable, leasable ,rentable and other terms of cost based area (if not sold or bought) are included.	
IVBN D	Introduction	Page 4	Ge	<p>The last sentence of this page says ‘...which <b>can be</b> used in ‘REAL ESTATE” or for....’</p> <p>The words ‘<b>can be</b>’ suggest that it’s a choice for each participant in real estate whether they use this standard for space measurements or not.</p> <p>So prEN 15221-6 is a standard for FM but not for property owners.</p> <p>This will cause great discussions between these participants.</p>	Proposal /RfC: For professional purposes if a floor area of a building is determined, this standard applies	
IVBN E	1		Ge	The first sentence implies the use of this standard for FM. So there is no use in a broader context?		
				<p>(Re: comments D-E)</p> <p>It is stated as the start of the document that the Introduction will be removed prior to publication. It is not clear whether part of the Introduction will remain, or some other introduction.</p>	<p>(Re: comments D-E)</p> <p>Comment valid.</p> <p>CEN/TC issue not WG issue, concerns generic introduction.</p>	

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