# R97071

**Gas Industry Standards Board**
**Request for Initiation of Standard for Electronic Business Transactions**
or
**Enhancement of an Existing GISB Standard for Electronic Business Transactions**

**1. Submitting Entity & Address:**

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**2. Contact Information:**

Jim Buccigross, Legal Counsel
Gregory M. Lander, President

**3. Description of Proposed Standard or Enhancement:**

The request is to add a new standard or standards language to the current GISB Electronic Delivery Mechanism standards. These proposed standards deal with the use of ISA (Envelope) Sender Identification codes when sending EDI files. We believe the proposed standard language below, while somewhat technical, clearly describes the changes we believe are necessary.

Proposed Standards

1. Where the sender of an ISA to IEA EDI X.12 envelope is a third party service provider, the ISA Sender ID in the EDI envelope should be the identifier chosen by the third party service provider. Where the receiver of an ISA to IEA EDI X.12 envelope is a third party service provider, the ISA Receiver ID in the EDI envelope should be the identifier chosen by the third party service provider.

2. Where the sender of an ISA to IEA EDI X.12 envelope is a service provider, the ISA Sender ID in the EDI envelope should be the identifier chosen by the service provider. Where the receiver of an ISA to IEA EDI X.12 envelope is a service provider, the ISA Receiver ID in the EDI envelope should be the identifier chosen by the service provider.

3. Where the sender of an ISA to IEA EDI X.12 envelope is a service requester, the ISA Sender ID in the EDI envelope should be the identifier chosen by the service requester. Where the receiver of an ISA to IEA EDI X.12 envelope is a service requester, the ISA Receiver ID in the EDI envelope should be the identifier chosen by the service requester.

4. For entities communicating their business intentions through a third party service provider (i.e., the parties requesting or providing transportation and related services (as applicable)), their ID's are placed at the level associated with the individual activities which are communicated via the EDI X.12 transmission, and these IDs are associated with the applicable service requester or services provider and these IDs may differ from the ID of the entity providing information services.

5. Parties sending or receiving GISB standardized datasets via EDI cannot require a sending or receiving party to employ (in the ISA enveloping structure or elsewhere) a common entity code or codes associated with others.

### 4. Use of the Proposed Standard or Enhancement:

These standards would describe the options available to parties regarding the use of Sender ID and Receiver ID in the EDI ISA enveloping structure. The proposed standards do not have any effect on the underlying data sets or data contained within them.

These standards would be utilized where EDI datasets are transmitted or received using the existing GISB Electronic Delivery Mechanisms.

### 5. Description of Any Tangible or Intangible Benefits to the Use of the Proposed Standard or Enhancement:

We are asking for these standards (read either separately or together) to allow third-party service providers to communicate with transportation service providers using their own common code entity identifiers, and that when communicating with TSP's via EDI, these third-party service providers are not required to "log-on" or otherwise identify themselves in the ISA envelope as anyone else, namely the entity requesting or providing transportation service.

Naturally, the reverse is true whereby TSP's determine their Receiver ID's when receiving data and their Sender ID's when sending data.

The benefit is that the sending and receiving parties are clearly identified using their own common entity codes (per GISB standards) and are not required to utilize other party's (i.e., the service requester's) common entity codes in the ISA envelope surrounding the transmissions.

Certainly the entity who is actually requesting or providing the service (one who has rights under a contract) must be identified in the body of the communication. Our request goes only to the enveloping and origination issues.

These additional proposed standards are in keeping with current GISB standards surrounding this issue which read as follows:

**GISB Standard Number:** 4.1.6 "Data providers (transportation service providers) should interface with third party vendors according to GISB standards."

**GISB Standard Number:** 4.1.7 "Electronic communications between parties to the transaction should be done on a non-discriminatory basis, whether through and agent or directly with any party to the transaction.

Failure to adopt these or similar interpretations will essentially "gut" the above listed standards, as not only do GISB standards require common entity codes, forcing a party to use someone else's codes in a field where their own belongs is discriminatory.

## 6.  Estimate of Incremental Specific Costs to Implement Proposed Standard or Enhancement:

There are no costs associated with these changes.  The request does not propose to increase the volume of data sent, nor does it have any effect on the underlying GISB standardized datasets themselves.  The request only desires to clarify what data is contained in existing ISA fields and who determines the data contained therein.

## 7.  Description of Any Specific Legal or Other Considerations:

None.

## 8.  If This Proposed Standard or Enhancement is Not Tested Yet, List Trading Partners Willing to Test Standard or Enhancement

TransCapacity is willing and able to undertake testing with any party regarding this proposal.

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## 9.  If This Proposed Standard or Enhancement Is In Use, Who are the Trading Partners:

Not applicable.

## 10.  Attachments

None.