

**COMMENT**

**AMERICAN COUNCIL OF INDEPENDENT LABORATORIES (ACIL)**

**OFFICE OF MANAGEMENT BUDGET (OMB)**

**REQUEST FOR COMMENTS ON OMB A-119,**

**“FEDERAL PARTICIPATION IN THE DEVELOPMENT AND USE OF VOLUNTARY  
CONSENSUS STANDARDS AND IN CONFORMITY ASSESSMENT ACTIVITIES”**

**MAY 12, 2014**

ACIL is pleased to submit comments on OMB’s request for comments on OMB A-119, “Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities.”

ACIL was founded in 1937 as the national trade association representing independent scientific laboratory testing. An independent laboratory is not affiliated with any institution, company or trade group that might affect its ability to conduct investigations, render reports, or give professional counsel objectively and without bias. ACIL’s membership operates over 1000 facilities nationwide and abroad. Members range from one-person specialty laboratories to multi-disciplined, international corporations employing thousands of engineers, analysts, risk management specialists, consultants and support staff.

ACIL was particularly critical in its comments in April 2012 to OMB’s Request for Information (RFI) based on ACIL’s experiences with federal agencies implementing conformity assessment systems over the past twenty-five years to the detriment of ACIL member independent laboratories.

However, ACIL finds the draft comments thoughtful, well-written, balanced and fair.

It remains to be seen whether federal agencies will take OMB guidance seriously. If they do and engage both government and private sector experience, the United States will be able to create conformity assessment systems that protect national interests, promote international trade and eliminate duplication and redundancy.

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