



INTERNATIONAL

Standards Worldwide

James A. Thomas
President

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May 12, 2014

Office of Management and Budget
725 17th Street NW
Washington, DC 20503

Re: Correction to Public.Resource.Org's Submission on the Proposed Revisions to OMB Circular A-119, "Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities"; Docket Number: 2014-02891

Dear Sir/Madam:

ASTM International submits these comments for the record to correct a gross misrepresentation of facts continually made by Public.Resource.org in its submission dated April 11, 2014 to OMB in response to OMB's proposed revisions to Circular A-119.

ASTM, a not-for-profit organization, has successfully served society for over 115 years by developing and publishing voluntary consensus standards that contribute to the advancement of innovation, competition, international trade, and the public's interests in health, safety, and the environment. ASTM's standards are utilized by over ninety industrial sectors in the US and in most geographic regions of the world. ASTM is accredited by the American National Standards Institute and meets World Trade Organization principles for the development of international standards.

Public.Resource.org continues to make a gross misrepresentation about ASTM on page 14 of its submission where it stated that "there are huge direct costs incurred by the government in purchasing copies of standards they must enforce..." and suggesting that there has been "\$88,706,506 in spending with the American Society of Testing and Materials..." Public.Resource.org's numbers are not factual. While ASTM receives some direct income when Federal agencies purchase ASTM standards and publications, the actual combined total of such purchases over the three-year period of FY2010 to FY2012 amounts to less than \$2 million, less than three percent of what Public.Resource.org stated in its submission. Accordingly, ASTM requests the record to reflect this misrepresentation and correction.

Thank you for the opportunity to submit these comments for the record. Please feel free to contact Jeff Grove in the ASTM Washington Office at 202-223-8505 to discuss ASTM's comments.

Sincerely,

A handwritten signature in cursive script that reads "James A. Thomas".

James A. Thomas