


## Comment on FR Doc # 2014-02891

This is a Comment on the **Office of Management and Budget (OMB)** Notice: **OMB Circulars; Proposed Revisions: Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities**

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### Submitter Information

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Lightning Protection Institute

### Comment

May 12, 2014

Attn: Howard Shelanski, Administrator  
Office of Information and Regulatory Affairs  
Office of Management and Budget  
Washington D.C.

Subject: Proposed Revision of OMB Circular # A-119

Dear Mr. Shelanski,

The Lightning Protection Institute is a nationwide not-for-profit organization founded in 1955 to promote lightning protection education, awareness, and safety. LPI members are dedicated to ensuring that today's lightning protection systems provide the best possible quality in both materials and installation practices for maximum safety. If you have any questions regarding this information, you can view listings of our programs and members at [www.lightning.org](http://www.lightning.org), or contact us at 800-488-6864.

We are in agreement with the assessment of Abdul Mousa that the processes for adoption of IEEE Standard 998 have failed to reflect the commonly expressed opinion of the international lightning protection community of experts. This failure has been extended through the IEEE process to include ANSI. The subject matter of Standards is too important for public safety from lightning to let this go unnoted.

We respectfully request your office take into consideration any actions available to make a "consensus" standard appropriate to expert opinion. If this is not anticipated, government agencies should be advised of suspected violations related to public safety. Agencies wishing to adopt standards on new subjects should provide proper due diligence on technical comments when questions arise.