

Asset Leadership Network (ALN)

Response to Request for Comments

OMB Circular A-119 Revisions Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities

Office of Management and Budget
May 12, 2014

We appreciate the opportunity to comment on the *Federal Register* notice submitted by the Office of Management and Budget (OMB) regarding the revised OMB Circular A-119, “Federal Participation in the Development and Use of Voluntary Consensus Standards and in Conformity Assessment Activities.”

The Asset Leadership Network (ALN) is a not-for-profit organization that is the foremost organization created for the advancement of asset management across all industries, markets and sectors. ALN focuses on identifying universal guiding principles and best practices that affect the management and value realization of assets.

ALN ardently supports the historically successful public-private partnership in standards development. The ALN believes that the revised Circular’s primary intent to “maximize the reliance by agencies on voluntary consensus standards and reduce to a minimum agency reliance on standards other than voluntary consensus standards, including reliance on government-unique standards” was met. ALN recognizes the significance of the revisions and more clearly defined approach and believes it will support our global and domestic market initiatives sufficiently. ALN agrees with the revisions as submitted.

ALN recognizes and appreciates that the revised Circular has addressed the concerns and recommendations of the stakeholders’ responses from the 2012 Request for Information in the Federal Register (77 Fed. Reg. 19357) ANSI response. The ALN, as a trade association based on standards development and use, collaborates with and endorses the ANSI statements submitted in response to this request and their summary response to the 2012 request referenced in this paragraph. ALN agrees with the ANSI statement in their 2012 response which stated, “As one of the biggest users of standards, the U.S. government’s participation in standards development activities is of the utmost importance. In keeping with the tenets of the NTTAA, the standardization community highly values the expert input that government employees provide and the reliance that agencies demonstrate by adopting and relying on voluntary consensus standards and compliance programs.” ALN looks forward to more participation from the public sector in the development of voluntary consensus standards and their use by the public sector,