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# **A Program for Conformity Assessment System Evaluation: Analysis of Comments on the NIST Proposal**

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March 1993



**U.S. DEPARTMENT OF COMMERCE  
Ronald H. Brown, Secretary**

**NATIONAL INSTITUTE OF STANDARDS  
AND TECHNOLOGY  
Raymond G. Kammer, Acting Director**



## FOREWORD

In preparing this analysis we have endeavored to minimize the requirements for interpretation and thereby the introduction of our own perspectives. For this reason we have kept our presentation brief and to the point.

We invite our readers to share their interpretations and their questions. We are prepared to discuss our work with the previously submitted comments over which we labored for so long. The strength of our conclusion depends on the soundness of our understanding of those comments. We will consider further comments an opportunity to refine and fine tune that understanding.

## ABSTRACT

The National Institute of Standards and Technology (NIST) proposed the establishment of a voluntary Conformity Assessment System Evaluation (CASE) program in a Federal Register Notice in March 1992. CASE would enable the Department of Commerce, acting through NIST, to provide assurances to foreign entities that designated U.S. conformity assessment activities satisfy international guidelines. Public comments on the proposal were requested and 173 responses were received. Review and analysis of these comments indicates a desire for NIST to provide recognition of privately operated accreditation programs, although considerable support can also be seen for NIST to provide both accreditation and recognition.

**Key Words:** Accreditation, certification, conformity assessment, evaluation, foreign regulations, quality systems, recognition, testing, and trade.

## TABLE OF CONTENTS

	<u>Page</u>
Foreword . . . . .	iii
Abstract . . . . .	iv
Background . . . . .	1
The NIST Proposal . . . . .	1
Submission of Comments . . . . .	2
Tabulation of Comments . . . . .	3
Positions on Proposal . . . . .	4
Applicability of the Results . . . . .	4
Compilation of Specific Comments . . . . .	5
Conclusion . . . . .	7
Table 1. Types and Numbers of Commenters on CASE Proposal . . .	8
Table 2. Classification of Respondents with Regard to Involvement in Conformity Assessment Activities . . .	9
Table 3. Position of Respondents on Overall Proposal . . . .	10
Table 4. Specific Comments Relative to General Support for the Program . . . . .	11
Table 5. Specific Comments Relative to Program Operation at Recognition Level Only . . . . .	12
Table 6. Specific Comments Relative to General Opposition to the Program . . . . .	13
Table 7. Specific Comments from Respondents Taking No Position . . . . .	14
Table 8. Specific Comments Relevant to Details of Proposed Program . . . . .	15
Table 9. Specific Comments Relative to Conformity Assessment and Mutual Recognition Agreements (MRA's) . . . . .	16

Table 10. Comments Relative to General Support for the Program . . . . . 17

Table 11. Comments Relative to Program Operation at Recognition Level Only . . . . . 18

Table 12. Comments Relative to General Opposition to the Program . . . . . 19

Table 13. Comments from Respondents Taking No Position . . . . . 20

Table 14. Other Comments Relevant to Elements of Proposed Program . . . . . 21

Appendix A. Identification of Respondents to Program Proposal . . . . . 23



## CASE -- ANALYSIS OF COMMENTS

### Background

The National Institute of Standards and Technology (NIST) proposed the establishment of a conformity assessment system evaluation program (CASE) in a Federal Register Notice on March 27, 1992. The proposed program would enable the Department of Commerce, acting through NIST, to provide required assurances to foreign governments that designated U.S.-based conformity assessment activities related to product sample testing, product certification, and quality systems registration satisfy international guidelines for their acceptance. The proposed program is intended to improve the competitiveness of U.S. products in international markets, such as the European Community (EC), based on the efficiencies derived from U.S.-based product evaluations.

In order to decide whether to establish the program and how--if established--to structure it, NIST requested comments reflecting U.S. industry opinion on how best to satisfy foreign requirements involving testing, certification, quality assessment, and related accreditations. In the notice, NIST also sought information on where industry would have NIST concentrate its efforts and which conformity assessment standards, guides, and other documents NIST should consider.

### The NIST Proposal

For the purposes of the proposed program, as published in the Federal Register, NIST classified conformity assessment activities into three levels.

The conformity level encompasses comparison of a product, process, service, or system with a standard or specification. As appropriate, the evaluating body can be a testing laboratory, product certifier or certification body, or quality system registrar.

The accreditation level encompasses the evaluation of a testing laboratory, a certification body, or a quality system registrar by an independent body--an accreditation body--based on requirements for the acceptance of such bodies, and the granting of accreditation to those which meet the established requirements.

The recognition level encompasses the evaluation of an accreditation body based on requirements for its acceptance, and the recognition by the evaluating body of the accreditation body which meets the established requirements.

NIST proposed to establish criteria and a system to evaluate and, when requested or directed, recognize specified conformity assessment activities. Program operation would be fully fee supported.

NIST would be prepared, when requested, to provide accreditation to certification bodies and registration bodies, at the accreditation level. (NIST already offers accreditation to testing laboratories through its National Voluntary Laboratory Accreditation Program.) NIST would also be prepared, when requested, to provide recognition to laboratory accreditation bodies, accreditors of certification bodies, and accreditors of registrars at the recognition level. NIST did not propose operating the program at the conformity level.

NIST proposed to devise a common procedural approach for all evaluation activities to be undertaken, relying on appropriate consensus standards and guides relating to conformity assessment. Although the general approach would be similar, the specific criteria for each area of concern at each level would differ according to the nature of the activity to be evaluated.

The proposed initial emphasis would therefore be to develop separate, unique criteria for evaluating different kinds of conformity assessment activities, e.g., laboratory accreditation systems, certification systems, registration systems, as necessary, for different technical or product areas. This activity would require substantial input from interested parties, supplied from public workshops or by industry sectoral committees. A significant number of existing national and international documents as well as other model systems would be used as resources for this activity.

The process would be initiated by voluntary application by an entity, payment of fees, quality system evaluation, quality documentation evaluation, on-site assessment, final evaluation, and approval decision. Participation would be voluntary and open to all entities that would desire NIST recognition in the areas offered.

Finally, when an applicant can demonstrate conformity with all program requirements, NIST would grant recognition in the form of a certificate of recognition and a document describing the specific scope of the recognition.

#### Submission of Comments

It was requested that comments on the proposal be submitted by September 30, 1992. (The deadline was twice extended from an earlier date.) This report takes into account 173 written responses received by NIST with comments and information on the notice. (Copies of all submissions are available for review in

the Reading Room at the Department of Commerce.) Respondents represented a cross-section of interested and affected parties -- individuals, small businesses (companies, testing laboratories, consultants), trade associations, standards developers, multi-national corporations and various organizations associated with one or more aspects of the conformity assessment process. At the outset, ten of the submissions were determined to be non-responsive in that they had no substantive comments or merely provided information promoting the availability of the writer's services. The scope and detail of the responsive comments ranged from short, single paragraph letters to multi-page legal briefs.

### Tabulation of Comments

Comments were organized into categories to reflect the primary functions of the individuals submitting them and the nature of the associated organizations, if any. NIST sources<sup>1</sup> were used along with staff consultations to make the assignments. Table 1 shows the initial results, i.e., the number of respondents by category. It was sometimes difficult to associate each respondent with a particular category since it was often possible to associate a respondent with multiple categories due to trade association affiliations and/or multiple committee memberships.

It was decided that analysis of comments and positions on the proposal should reflect the nature of a respondent's involvement and/or vested interest in conformity assessment. Table 2 shows the number of respondents when the categories take interest in conformity assessment activities (i.e., whether as "users" or "operators") into account. "Users" of conformity assessment services include private companies and some industry trade associations; since some of the latter also operate and/or sponsor certification or accreditation programs, they must therefore be considered as operators.

Within the user group, companies were divided into two sub-groups according to the respondent's management responsibilities -- a large number of responses were received from personnel with some management responsibility in their company's quality assurance organization. It was also convenient to designate a separate category for "public organizations" and to group the remainder

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<sup>1</sup>Reference was made to NIST Special Publications 774-- "Directory of U.S. Private Sector Product Certification Programs", Dec. 1989; 806--"Standards Activities of Organizations in the United States", Feb. 1991; and 831--"Directory of Professional/Trade Organization Laboratory Accreditation/Designation Programs", March 1992; as well as internal NIST records of "North American Quality System Registration Organizations as of September 29, 1992".

under "miscellaneous." The 163 responsive commenters are listed by name and organized by category in Appendix A.

### Positions on Proposal

Most respondents expressed a position on whether and to what extent NIST should establish the proposed program. Their positions could be characterized most generally as supportive, supportive in part, or opposed. Some respondents took no position on the establishment of the program, but chose instead to comment on its content. A few respondents submitted confusing or extraneous comments, appearing not to understand the proposal well. Table 3 tallies positions by respondent categories. Not all determinations were straightforward. Some comments initially appeared to be opposed to the proposed program, but on closer examination revealed a recognition of the need for a limited governmental role, specifically one restricted to the recognition level only. Such responses were tallied under "supports operation at recognition level only" in Table 3.

Table 3 shows that 142 of the 163 letters considered for evaluation purposes were interpreted as taking a position on the proposal; 21 were not. Of the 142 expressing a preference, 43 generally supported the proposal, 80 supported the proposal in part -- at the recognition level only -- and 19 were opposed to the program. Thus, approximately 87% of the respondents favored the program in some form, and approximately 13% rejected it. Among those supporting the proposal to some extent, those preferring only the recognition level outnumbered general supporters by about two to one; the level of general support more than doubled the opposition level. In the aggregate, the modal choice was clearly for establishment of the program at the recognition level.

### Applicability of the Results

A review of the data presented in Table 3 shows that the results for many of the respondent categories are consistent with the results obtained overall--30% favoring the program, 56% supporting a program limited to the recognition level, and 13% opposing any program. Among private sector users of conformity assessment stating positions, 18 were generally in favor (28%), 40 favored the recognition level (63%), and 6 were totally opposed (9%). Of those involved with conformity assessment, 22 responded generally positive (33%), 31 favored the recognition level (47%), and 13 opposed the program altogether (20%). These results are consistent with the overall results, although among the users groupings, the results for quality system managers deviated sharply from the aggregate distribution, as did those for the registrars, building code groups, accreditors, and standards coordinators among groupings involved with conformity assessment.

The responses of corporate quality management and the quality system registrars were significant for the extent of their consensus. They said, almost unanimously, they wanted the program, but they wanted NIST to provide only the recognition level. Their support acknowledged the availability of accreditation services and a need for recognition of those services. The positions taken by accreditation bodies were consistent with those of the quality systems respondents.

The groupings of responses from users and providers of conformity assessment services, not limited to quality systems, tended to be more supportive of the general proposal than did those exclusively focused on quality systems management and registration. Nonetheless, the results for most of these groupings were consistent with the overall results supporting the program's being operated at the recognition level.

The building code groups and standards coordinators were noteworthy in their unanimous rejections of the proposal. The building code groups' positions were based on the view that the NIST program was unnecessary, while the standards coordinators felt the program would on balance be a detriment to industry objectives with respect to trade. Clearly these results are not consistent with those of any other grouping, especially since 41 of the 45 corporate responses support some form of the program and 19 of the 22 trade association responses are similarly supportive; many of the corporate and association respondents are also members of the coordinators' group.

The results shown in Table 3 for the groupings included under public organizations and the remainder under miscellaneous are consistent with the overall results, with the notable exception of the three state government agencies, all of whom supported the full proposal.

#### Compilation of Specific Comments

Many respondents submitted specific comments relating to the proposed program. Tabulations of the numbers of respondents offering similar comments are displayed in five tables: Table 4, comments of respondents supporting the proposal in general; Table 5, comments of respondents supporting operation at the recognition level; Table 6, comments of respondents generally opposing the proposal; Table 7, comments of respondents indicating no position on the proposal; Table 8, other respondent comments relevant to program details; and Table 9, comments relevant to conformity assessment generally and mutual recognition. Tables 10-14 present detailed breakdowns of the summarized tabulations of Tables 4-8 by category of respondent where there is more than one respondent for a given comment.

Table 4 presents comments of those supporting the proposal related to factors external to the program. Several comments, offered by a number of respondents, concerned the role of government and the need for its participation. A few commented on specifics of the program, referring to public participation and cooperation with the private sector. Still others made observations about the practice of conformity assessment activities in the U.S., implying that the proposed program would have an impact.

Some of the comments tabulated in Table 5 reflect the reasons given for their preference by those favoring the recognition level; most of these are reasons for excluding direct accreditation. Most often cited among these were (i) conflict of interest (doing both), (ii) a job better done by the private sector, and (iii) redundancy and duplication of service to be avoided. Many of the responses supporting operation at the recognition level included conditions among their comments. Many respondents--mainly those with interests in quality systems management and registration--indicated support specifically for a quality systems orientation. Other respondents requested the program be initiated only when more was known about pertinent foreign regulations and limited to products subject to such regulations.

Table 6 tabulates comments offered by those opposing the program. The most recurrent comment was that the private sector was already doing what was needed and that government involvement in any form was undesirable, unwanted, and unnecessary.

The tabulation of comments in Table 7 for respondents taking no position on the proposal, introduces one noteworthy new comment not otherwise submitted by those respondents taking positions on the proposal. The comment was in the form of a request to specifically exclude laboratories not involved in product testing or trade matters, so that those doing environmental and occupational health testing would face no ambiguity as to their status relative to the program. The other comments are seen to be additional expressions of comments previously tabulated in the prior three tables.

Table 8 tabulates comments identified as pertinent to the development of the proposal, in detail. Almost all of the comments presented in the table affirm as acceptable a number of specific features of the program as presented in the proposal. Some comments cited references which should be used in the program, and some introduced the use of a Federal Advisory Committee.

Table 9 identifies comments offered by a few respondents that do not deal directly with the proposed program itself. The comments instead are expressions of opinions on issues related to

conformity assessment, e.g., the need for cooperation, and mutual recognition, e.g., the conduct of negotiations. It is noted that only a few respondents chose to raise these issues as relevant to a decision on the proposal.

### Conclusion

The vast majority of the respondents opted for development of the NIST program at the recognition level; a less significant, but non-trivial segment of the respondents opted for operation of the program at both the accreditation and recognition levels. No respondent sought extension of the proposal to include activity by NIST at the conformity level. Few comments called for changes to specific details of the program as proposed.

**Table 1. Types and Numbers of Commenters on CASE Proposal**

Private Companies	49
Trade Associations and Coalitions	27
Testing Laboratories	21
Consultants	15
Multi-Purpose Conformity Assessment Entities	6
Individuals	6
Quality System Registrars	6
Certification Agencies	6
Building Code Organizations	4
Professional/Technical Organizations	4
State Government Agencies	4
Accreditation Bodies	3
Standards Coordination Bodies	2
Standards Committees	2
Academia	2
U.S. Government Agencies	2
Composite Government Advisory Committees	2
Total Responsive Submissions =	163
Non-Responsive Submissions	10
Total Submissions =	173



**Table 2. Classification of Respondents with Regard to Involvement in Conformity Assessment Activities**

Producers/Suppliers/Industry Sectors -- Those with no apparent vested interest in conformity assessment activities:	
Companies -- Submissions from non QA Management	25
Companies -- Submissions from QA Management	24
Trade Associations	15
Coalitions (of Trade Associations and Business Federations)	3
Total =	68
Entities Associated with Standards and Conformity Assessment Activities:	
Testing Laboratories	21
Consultants	15
Multi-Purpose Conformity Assessment Organizations	8
Trade Associations	8
Quality System Registrars	6
Certification Agencies	6
Building Code Organizations	4
Professional/Technical Organizations	4
Accreditation Bodies	3
Standards Coordination Bodies	3
Standards Committees	2
Total =	79
Miscellaneous:	
Individuals	6
Composite Government Advisory Committees	2
Total =	8
Public Organizations:	
State Government Agencies	4
Federal Government Agencies	2
Academia	2
Total =	8
Grand Total =	163

Table 3. Position of Respondents on Overall Proposal

	Number of Respondents	Supports Program in General	Supports Operation at Recognition Level Only	Opposes Program in General	No Position (Comments without taking a position)
Producers/Suppliers/Industry Sectors:					
Companies -- non QA Management	25	3	12	2	2
Companies -- QA Management	24	1	19	2	2
Trade Associations	16	6	5	2	
Coalitions	3	2	1		
Total =	68	18	40	6	1
Entities Associated with Standards and Conformity Assessment Activities:					
Testing Laboratories	21	6	31	2	6
Consultants	15	4	6	3	2
Multi-Purpose C.A. Entities	2	2	5	1	
Trade Associations	8	4	2	1	2
Quality System Registrars	6	1	5		
Certification Agencies	6	3	7		1
Building Code Organizations	4		5	1	
Prof./Tech. Societies	4	2	1		1
Accreditation Bodies	3		2		1
Standards Coord. Bodies	2			2	
Standards Committees	2	6	6		
Total =	79	22	31	13	13
Miscellaneous:					
Individuals	8		6		1
Composite Govt. Adv. Comm.	2		2		
Total =	8		7		1
Public Organizations:					
State Govt. Agencies	4	4			1
U.S. Govt. Agencies	2		1		1
Academia	2		1		1
Total =	8	3	2		3
Grand Totals =	163	43	80	19	21

Table 4. Specific Comments Relative to General Support for the Program

	<u>Frequency</u>
Critical for government to become involved to take leadership role in conformity assessment	14
Some form of government oversight required to address international concerns	11
U.S. programs will receive government recognition to make them internationally accepted	8
CASE would provide mechanism to assure other governments of competency of qualified U.S. conformity assessment entities	7
Urges speedy development and implementation	6
Conformity assessment issues must be addressed for U.S. laboratories and products to compete overseas	6
CASE is an appropriate response to EC initiatives	6
Would like to participate in program development	5
U.S. needs uniform coherent national system of conformity assessment that eliminates multiple accreditations	5
Industry-government cooperation in program development	5
Need for assurances of U.S. conformity assessment activities in certification of weighing and measuring standards in the operation of metrology laboratories	5
CASE will be industrial sector driven - a very desirable characteristic	4
CASE provides needed public/private sector cooperation	4
Assure that similar services are not available in private sector	4
Fee structure should consider smaller firms	4
Establish program at both recognition and accreditation levels	3
EC seems reluctant to honor voluntary system in place in U.S.	2
Assure that foreign regulatory authorities will accept CASE recognition and accreditation	2
Utilize existing accreditation programs first	2
Apply only to products regulated by foreign governments	2
Utilize other agencies/programs with jurisdiction or technical expertise	2
Not appropriate to compete with private sector accreditation programs	2
Needs independent administrator (Government and industry)	2
Because U. S. system is not in place we must utilize foreign sources for conformity assessment	1
Because there is no U.S. Government oversight, credibility of U.S. products suffers in foreign markets	1
The requirement to obtain approvals for new EC Directives has resulted in lost business	1
Program should be flexible to meet current and future needs	1
NIST recognition should be available only to U.S.-owned and U.S.-based entities	1
Operate at recognition and accreditation levels only if required and only after attempting to gain recognition of existing private sector programs	1

Table 5. Specific Comments Relative to Program Operation at Recognition Level Only

	<u>Frequency</u>
Conflict of interest to operate at two levels	47
Supports recognition of ANSI/RAB	41
Duplication/unfair competition with private sector accreditation programs	40
Support Addresses Quality System Aspect Only	31
Accreditation better served by private sector	25
Apply only to products regulated by foreign governments	16
Premature to implement at this time	14
Operate at accreditation level where no private sector program exists or where required by law	7
Supports recognition of ANSI accreditation program for certification of products	7
Dual accreditation methods (i.e., private & public) could necessitate multiple accreditations	7
Implement only if absolutely necessary	6
Should not assume responsibilities of other Federal agencies	5
Cost effectiveness for accreditation level favors private sector	5
Confuses accreditation of QSR's in U.S.	5
EC requirements not totally clarified	4
Operate at accreditation level if requested by private sector	4
Program should be responsive only to demonstrated need	4
Coordinate activities with other federal agencies	2
Urges speedy completion of program	2
Governments have exclusive role at recognition level to facilitate trade	2
NIST should cease NVLAP except for those programs subject to federal legislation	2
Fee structure should consider smaller firms	2
Assure that EC officials will recognize CASE	1
Concerns indicated about the competency and consistency of government assessors involved in performing accreditation level assessments	1
There should be a single accreditation body for regulated and unregulated products to avoid confusion	1
Recommends trial run of the CASE program be conducted at the recognition level for the pressure technology sector	1
Feels EC may use quality assessment as a trade barrier	1
Market size for accreditation activities will not support multiple accreditation bodies	1
Enhancement of the acceptance of U.S. laboratory services in the international market should be a stated goal	1
The appropriate role of government will differ by industrial sector	1

**Table 6. Specific Comments Relative to General Opposition to the Program**

	<u>Frequency</u>
Supports ANSI to administer conformity assessment	7
Supports ANSI/RAB	6
Government programs increase costs	5
Program premature at this time	5
Duplicates/competes with private sector	5
Government intervention in private/sector business	3
EC has not stated that government involvement will be necessary	3
Industry already established own successful program with foreign assessment groups	2
Increased costs and restrictions	2
CASE assumes responsibilities of other Federal agencies	2
CASE inconsistent with OMB Circulars A-119 and A-76	2
Government involvement in conformity assessment would be greater than necessary	1
Government administered "voluntary" programs tend to become mandatory	1
Conflict of interest	1
No evidence that a CASE program would benefit U.S. manufacturers exporting to EC	1
State that program is restricted to regulated products involved in trade	1

**Table 7. Specific Comments from Respondents Taking No Position**

	<u>Frequency</u>
Requests exclusion for laboratories not involved in product testing (i.e., lab services in environmental/industrial hygiene) or in international commerce	12
Added costs to small business will affect interest in program	5
Role of government should be to assist private sector in international recognition	3
Appears to duplicate ANSI/RAB	3
CASE should encourage reliance on ISO 9000	2
CASE may be needed, but explore other programs first	1
Consideration should be given to environmentally safe products and environmental compliance	1
Inappropriate for NIST to become involved in both recognition and accreditation levels	1

Table 8. Specific Comments Relevant to Details of Proposed Program

	<u>Frequency</u>
Implication of ISO 9000 standards on domestic and international competitiveness is significant	23
Recommends use of international standards and guides as program criteria	20
Agrees that CASE should not operate at conformity level	15
Cites OMB Circular A-119 as model for government involvement in private sector conformity assessment and standardization activities	12
Use common language (w/EC) to describe conformity assessment activities	8
Industry input should be via a CASE Program Advisory Commission or through industry sectoral committees	6
Government and industry must make a coordinated effort to establish credible program	6
Provide due process and openness	6
When requested, establish new industry sector accreditation program per Federal Advisory Committee Act	5
Relationship to other Federal and state agency conformity assessment programs in operation	5
Fees should be carefully monitored and cover cost of services only - not start-up costs	5
Promulgate clear, understandable policies, rules and administrative/technical criteria	4
An appeals procedure should be provided	4
"CASE" acronym already in use	4
Existing agencies should not receive preferential treatment	3
All CASE evaluators should be Federal employees	3
Utilize ANSI Z-34 standard	2
One test report or quality system audit should suffice for all markets	2
Favors NVLAP option of using full or partial list of standards - depending on applicant's interest	2
NIST should be "competent authority" for U.S.	1
Governmental bodies should be treated same as private sector bodies regarding technical qualifications	1
NIST not a consensus group - could not create necessary balance for voluntary program	1
Encourage NIST to work with ANSI on conformity assessment issue	1
Recommends study of U.S. conformity assessment industry	1
Recommends study of public (NIST) and private (ANSIRAB) approaches to accreditation of quality system registration	1
Registrars, certifiers and their employees must be held to strict standards of confidentiality	1
Negotiate with EC for acceptance as notified bodies those organizations recognized by U.S. Government	1
Segmented "industry-by-industry" approach will be costly and inefficient	1
Recognition rules, regulations and procedures should be harmonized among all Federal regulatory agencies	1
CASE model not completely accurate -- Recognition should be based on broader range of conformity assessment activities	1

**Table 9. Specific Comments Relative to Conformity Assessment  
and Mutual Recognition Agreements (MRA's)**

	<u>Frequency</u>
Negotiation of MRA's should be first priority	4
MRA's must provide for national treatment	3
CASE premature because meaning of MRA's still unclear	3
MRA must provide means for effective national implementation	2
CASE will facilitate development of MRA's between U.S. and counterpart conformity assessment organizations	1
Encourage NIST to work with ANSI on conformity assessment issue	1
Recommends study of U.S. conformity assessment industry	1
Recommends study of public (NIST) and private (ANSI/RAB) approaches to accreditation of quality system registration	1
Must address how CASE will "fit" into current regulatory structure in U.S.	1
Recommends tri-partite (government-industry-standards developers) institute to develop policy/strategy	1
Negotiate with EC for acceptance as notified bodies those organizations recognized by U.S. Government	1
NIST should be "competent authority" for U.S.	1
MRA's have priority over implementation of proposal	1



Table 10. Comments Relative to General Support for the Program

	Producers/Suppliers/Industry Sectors				Conformity Assessment Associated										Misc.		Public Organ.								
	Companies -- non-OA Management	Companies -- OA Management	Trade Associations	Coalitions	Total	Testing Laboratories	Consultants	Multi-Purpose C.A. Entities	Trade Associations	Quality System Registrars	Certification Agencies	Building Code Organization	Prof./Tech. Societies	Accreditation Bodies	Standards Coord. Bodies	Standards Committees	Total	Individuals	Composite Govt. Adv. Comm.	Total	State Govt. Agencies	U.S. Govt. Agencies	Academia	Total	Grand Totals
Critical for government to become involved to take leadership role in conformity assessment	4	1	1	1	7	2	2			1			1			1	7								14
Some form of government oversight required to address international concerns	1	1	1		3	1	1	1	1	1							5					3		3	11
U.S. programs will receive government recognition to make them internationally accepted	1	2	1	1	5	2				1							3								8
CASE would provide mechanism to assure other governments of competency of qualified U.S. conformity assessment entities	2	1		1	4	2			1								3	1		1					7
Urges speedy development and implementation	1	1	1		3	1		1	1								3								6
Conformity assessment issues must be addressed for U.S. laboratories and products to compete overseas	1		1		2	2			1	1							4								6
CASE is an appropriate response to EC initiatives	1		2		3	1		1	1								3								6
Would like to participate in program development			1		1	1	1				1		1				4								5
U.S. needs uniform coherent national system of conformity assessment that eliminates multiple accreditations	1				1	1		1	1		1						4								5
Industry-government cooperation in program development			1		1						3		1				4								5
Need for assurances of U.S. conformity assessment activities in certification of weighing and measuring standards in the operation of metrology laboratories	2				2																	3	3		5
CASE will be industrial sector driven - a very desirable characteristic			2		2	1			1								2								4
CASE provides needed public/private sector cooperation			1	1	2				1	1							2								4
Assure that similar services are not available in private sector	3		1		4																				4
Fee structure should consider smaller firms						2	2										4								4
Establish program at both recognition and accreditation levels	1	1			2				1								1								3
EC seems reluctant to honor voluntary system in place in U.S.			1		1				1								1								2
Assure that foreign regulatory authorities will accept CASE recognition and accreditation	1		1		2																				2
Utilize existing accreditation programs first	1				1	1											1								2
Apply only to products regulated by foreign governments	1		1		2																				2
Utilize other agencies/programs with jurisdiction or technical expertise	1		1		2																				2

Table 11. Comments Relative to Program Operation at Recognition Level Only

	Producers/Suppliers/Industry Sectors				Conformity Assessment Associated										Misc.	Public Organ.	Grand Totals									
	Companies -- non-QA Management	Companies -- QA Management	Trade Associations	Coalitions	Total	Testing Laboratories	Consultants	Multi-Purpose C.A. Entities	Trade Associations	Quality System Registrars	Certification Agencies	Building Code Organization	Prof./Tech. Societies	Accreditation Bodies	Standards Coord. Bodies	Standards Committees		Total	Individuals	Composite Govt. Adv. Comm.	Total	State Govt. Agencies	U.S. Govt. Agencies	Academia	Total	
Conflict of interest to operate at two levels	2	15	3		25	6	3	2	1	3	2			1			18	3	3			1			1	47
Supports recognition of ANSI/RAB	7	15	3		25	1	2	1		4	1			2		1	12	3	3			1			1	41
Duplication/unfair competition with private sector accreditation programs	6	9	6		19	6	3	2	2	2	2		1				18	2	2				1		1	40
Support Addresses Quality System Aspect Only	2	14	1		17	1	3		5				1		1		11	3	3							31
Accreditation better served by private sector	4	8	1		13	2	1	2			1			2			8	1	1	2		1	1		2	25
Apply only to products regulated by foreign governments	4	1	4	1	10			1	1				1		1		4	1	1			1			1	16
Premature to implement at this time	3	1	5	1	10			2		1							3	1	1							14
Operate at accreditation level where no private sector program exists or where required by law	1				1			3					2				5	1	1							7
Supports recognition of ANSI accreditation program for certification of products	3		1		4			2	1								3									7
Dual accreditation methods (i.e., private & public) could necessitate multiple accreditations	1	2	1		4				2								2	1	1							7
Implement only if absolutely necessary			2	1	3				1								1	1	1						1	6
Should not assume responsibilities of other Federal agencies				1	1				3								3	1	1							5
Cost effectiveness for accreditation level favors private sector	2	1			3	1	1										2									5
Confuses accreditation of QSR's in U.S.		3			3					2							2									5
EC requirements not totally clarified			1	1	2				1								1	1	1							4
Operate at accreditation level if requested by private sector		1	1		2			1							1		2									4
Program should be responsive only to demonstrated need			1		1			2	1								3									4
Coordinate activities with other federal agencies			1	1	2																					2
Urges speedy completion of program	1				1								1				1									2
Governments have exclusive role at recognition level to facilitate trade	1				1								1				1									2
NIST should cease NVLAP except for those programs subject to federal legislation	1				1	1											1									2
Fee structure should consider smaller firms						1	1										2									2

Table 12. Comments Relative to General Opposition to the Program

	Producers/Suppliers/Industry Sectors				Conformity Assessment Associated					Misc.	Public Organ.														
	Companies -- non-QA Management	Companies -- QA Management	Trade Associations	Coalitions	Total	Testing Laboratories	Consultants	Multi-Purpose C.A. Entities	Trade Associations	Quality System Registrars	Building Code Organization	Prof./Tech. Societies	Accreditation Bodies	Standards Coord. Bodies	Standards Committees	Total	Individuals	Composite Govt. Adv. Comm.	Total	State Govt. Agencies	U.S. Govt. Agencies	Academia	Total	Grand Totals	
Supports ANSI to administer conformity assessment	1		1		2	1		1			2			1		5									7
Supports ANSI/RAB	1	1	1		3	2								1		3									6
Government programs increase costs	1		1		2	2	1									3									5
Program premature at this time			2		2			1						2		3									5
Duplicates/competes with private sector						1				2			2			5									5
Government intervention in private/sector business						1	2									3									3
EC has not stated that government involvement will be necessary			2		2			1								1									3
Industry already established own successful program with foreign assessment groups			1		1			1								1									2
Increased costs and restrictions						1	1									2									2
CASE assumes responsibilities of other Federal agencies			1		1								1			1									2
CASE inconsistent with OMB Circulars A-119 and A-76								1					1			2									2

Table 13. Comments from Respondents Taking No Position

	Producers/Suppliers/Industry Sectors				Conformity Assessment Associated										Misc.	Public Organ.									
	Companies -- non-QA Management	Companies -- QA Management	Trade Associations	Coalitions	Total	Testing Laboratories	Consultants	Multi-Purpose C.A. Entities	Trade Associations	Quality System Registrars	Certification Agencies	Building Code Organization	Prof./Tech. Societies	Accreditation Bodies	Standards Coord. Bodies	Standards Committees	Total	Individuals	Composite Govt. Adv. Comm.	Total	State Govt. Agencies	U.S. Govt. Agencies	Academia	Total	Grand Totals
Requests exclusion for laboratories not involved in product testing (i.e., lab services in environmental/industrial hygiene) or in international commerce	1				1	7	1						1				9	1	1				1	1	12
Added costs to small business will affect interest in program						3	1										4						1	1	5
Role of government should be to assist private sector in international recognition	1				1	2											2								3
Appears to duplicate ANSI/RAB		1			1		1						1				2								3
CASE should encourage reliance on ISO 9000	1	1			2																				2

Table 14. Other Comments Relevant to Elements of Proposed Program

	Producers/ Suppliers/ Industry Sectors				Conformity Assessment Associated										Misc.		Public Organ.								
	Companies -- non-QA Management	Companies -- QA Management	Trade Associations	Coalitions	Total	Testing Laboratories	Consultants	Multi-Purpose C.A. Entities	Trade Associations	Quality System Registrars	Certification Agencies	Building Code Organization	Prof./Tech. Societies	Accreditation Bodies	Standards Coord. Bodies	Standards Committees	Total	Individuals	Composite Govt. Adv. Comm.	Total	State Govt. Agencies	U.S. Govt. Agencies	Academia	Total	Grand Totals
Implication of ISO 9000 standards on domestic and international competitiveness is significant	6	4	5		15				2	1					1	4					4			4	23
Recommends use of international standards and guides as program criteria	6		3		9	1	3	3	2			1	1			11									20
Agrees that CASE should not operate at conformity level	3		1	1	5	2	2		1	1	1		1			3		1	1						15
Cites OMB Circular A-119 as model for government involvement in private sector conformity assessment and standardization activities	2	1	3		6			1	1	1			1			4	1		1		1		1	1	12
Use common language (w/EC) to describe conformity assessment activities	2	1	2		5	1				1		1				3									8
Industry input should be via a CASE Program Advisory Commission or through industry sectoral committees	1		2		3				1			1	1			3									6
Government and industry must make a coordinated effort to establish credible program	3		1		4				1							1		1	1						6
Provide due process and openness			2	1	3			1		1		1				3									6
When requested, establish new industry sector accreditation program per Federal Advisory Committee Act						3			1	1						5									5
Relationship to other Federal and state agency conformity assessment programs in operation	2		2		4				1							1									5
Fees should be carefully monitored and cover cost of services only - not start-up costs	2		1		3			1								1	1		1						5
Promulgate clear, understandable policies, rules and administrative/technical criteria			1		1	1			1	1						3									4
An appeals procedure should be provided	2		1		3			1								1									4
"CASE" acronym already in use			1		1	1				1						2		1	1						4
Existing agencies should not receive preferential treatment			1		1			1		1						2									3
All CASE evaluators should be Federal employees		1	1		2				1							1									3
Utilize ANSI Z-34 standard							1	1								2									2
One test report or quality system audit should suffice for all markets	1		1		2																				2
Favors NVLAP option of using full or partial list of standards - depending on applicant's interest		1	1		2																				2



Appendix A  
Identification of Respondents to Program Proposal

Producers/Suppliers/Industry Sectors -- Those with no apparent vested interest in conformity assessment activities.

Companies -- Submissions from non QA Management

Name of Organization	Respondent	Date
ASC Incorporated	Heinz Prechter Chairman	5/26/92
APV Crepaco Inc.	Todd Schlosser Commodity Manager	5/29/92
AT&T	Dennis K. Thovson Corporate External Standards VP	9/14/92
Bechtel	L. T. Papay VP & Manager of Research & Development	5/14/92
Caterpillar, Inc.	Gerald H. Ritterbusch Manager, Product Safety & Environmental Control	9/28/92
Conoco Inc.	Leo C. Hearn, Jr. Senior Industrial Hygienist	7/24/92
DuPont	Jeffrey M. Lipton VP, Chairman of Corporate Trade Policy Committee	8/17/92
DuPont Fibers	Terry N. Rahmeier Engineering Technology Manager	5/22/92
Finish Thompson Inc.	H. David Bowes President/CEO	9/18/92
Ford Motor Company	H. O. Petrauskas VP, Environmental and Safety Engineering	9/18/92
Frigidaire Company	Dennis R. Wilson Manager of Product Engineering	7/21/92
The Gates Corporation	Charles G. Gates Chairman and Chief Executive Officer	5/22/92

Identification of Respondents to Program Proposal (continued)

Producers/Suppliers/Industry Sectors -- Those with no apparent vested interest in conformity assessment activities.

Companies -- Submissions from non-OA Management

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
Grayhill, Inc.	John M. Kikta Vice President, Development	7/15/92
Honeywell Inc.	Donald L. Flamm Vice President & General Manager	6/29/92
Hubbell	L. W. Kenyon VP Engineering & Development	5/18/92
Liquid Controls Corp.	Melvin C. Hankel Manager of Engineering	7/25/92
The L. S. Starrett Company	D. R. Starrett President	5/21/92
Mallory	W. P. Carrier Consultant	6/30/92
Microswitch	Robert C. Geiseman Agency Liaison Representative	7/10/92
3M Metrology Laboratory	Guy K. Grant Manager, Corporate Metrology Laboratory	8/13/92
Silicon Graphics, Inc.	David M. Hanttula Manager, Product Compliance Engineering	9/22/92
Tenney Engineering, Inc.	Robert S. Schiffman President	5/7/92
TRW Fasteners Division	Derek G. Melven VP, General Manager	5/18/92
Unisys Corporation	Stephen P. Oksala Director, Corporate Standards	5/15/92
Whirlpool Corporation	A. J. Takacs VP, Government Relations	5/13/92



Identification of Respondents to Program Proposal (continued)

Producers/Suppliers/Industry Sectors -- Those with no apparent vested interest in conformity assessment activities.

Companies -- Submissions from QA Management

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
Acacia Mutual Life Insurance	Richard D. Mayfield Vice President, Quality	6/19/92
Allegheny Ludlum Corp.	W. D. Edsall Director, Quality Assurance	5/12/92
Alpha Metal Finishing Co.	Gary R. Marchand Statistical Quality Control Manager	9/25/92
Baldor Electric Company	Stan George Director of Corporate Quality	5/22/92
Banc One Corporation	Charles A. Aubrey VP & Chief Quality Officer	5/26/92
Bellcore	J. L. (Pete) Pence Assistant VP, Switching Analysis & Quality Technology	9/28/92
Bimba Manufacturing Co.	Joseph P. Sener, P.E. Director of Engineering & Quality	5/13/92
CF Motor Freight	Gary M. Keenan VP, Quality Processes	5/1/92
Chemetals Inc.	Ronald L. Baker Quality Assurance Manager	4/23/92
Control Data Systems, Inc.	G. R. Ballata Vice President, Quality	7/29/92

Identification of Respondents to Program Proposal (continued)

Producers/Suppliers/Industry Sectors -- Those with no apparent vested interest in conformity assessment activities.

Companies -- Submissions from QA Management

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
Daniel Valve Company	Gary D. Potts Quality Assurance Manager	5/12/92
Emerson Electric Co.	Norman G. Siefert Division Director of Quality Services	6/16/92
Eastman Kodak Co.	Ronald L. Heidke VP & Director, Corporate Quality	9/28/92
Harbison-Walker Refractories	Melvin G. Wees Manager, Quality Control	7/7/92
Humphrey Products	David C. Blackburn Director of Quality	6/1/92
ICF Kaiser Engineers	Royce E. Monks Manager, Projects Quality Assurance	5/12/92
Ideal Industries, Inc.	James R. MacMurdo Manager, Quality Assurance	5/8/92
J I Case	J. L. Evans Vice President, Quality	5/8/92
Olin Rocket Research Co.	Walter I. Rissler Supplier Quality Assurance Manager	5/15/92
Pacific Scientific Co.	Steven Palm Quality Manager	5/20/92
Snap-on Tools Corp.	Kenneth A. Pike VP, Corporate Quality	5/11/92
TRW Ross Gear Division	Roy F. Abell Director, Quality	4/29/92
Uniroyal Chemical Company, Inc.	W. Keith Baggett Director, Quality Assurance	5/18/92
VanLeer Packaging Worldwide	Noel D. Walter Quality Systems Manager	5/11/92

Identification of Respondents to Program Proposal (continued)

Producers/Suppliers/Industry Sectors -- Those with no apparent vested interested in conformity assessment activities.

Trade Associations

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
Aerospace Industries Association	Joseph Dauksys Director, Quality Assurance	7/20/92
American Electronics Association	Brian P. Wynne Director, International Trade	9/30/92
American Insurance Association	William C. Price Counsel	6/26/92
American Paper Institute, Inc.	Irene W. Meister Senior Vice President, International	6/22/92
American Textile Manufacturers Institute	Hardy Poole Director, Product Services	9/25/92
Chemical Manufacturers Association	Gordon D. Strickland VP - Technical Services	9/14/92
Compressed Gas Association, Inc.	Ralph O. Tribolet CGA Consultant	9/2/92
Computer and Business Equipment Manufacturers Association	John L. Pickitt President	7/31/92
Electronic Industries Association	John A. Wyatt, Sr. Director, Engineering Department	7/22/92
Equipment Manufacturers Institute	John H. Crowley Director of Engineering Programs	9/29/92
Health Industry Manufacturers Association	Edward M. Rozynski VP, International	5/20/92

Identification of Respondents to Program Proposal (continued)

Producers/Suppliers/Industry Sectors -- Those with no apparent vested interested in conformity assessment activities.

Trade Associations

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
National Electrical Manufacturers Association	Frank K. Kitzantides Vice President, Engineering	9/25/92
National Forest Products Association	Richard Enlow Chairman, EC Technical Advisory Committees	7/21/92
Power Tool Institute, Inc.	James E. Bates Executive Manager	9/24/92
Rubber Manufacturers Association	John R. Serumgard Vice President, Tire Division	7/24/92
Telecommunications Industry Association	Allen R. Frischkorn, Jr. President	9/2/92

Producers/Suppliers/Industry Sectors -- Those with no apparent vested interested in conformity assessment activities.

Coalitions (of Trade Associations and Business Federations)

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
Small Business Legislative Council	E. Colette Nelson Chairman, SBLC Procurement Committee	5/15/92
Industry Coalition on Standards and Trade	(23 trade associations)	8/20/92
U.S. Chamber of Commerce	Harvey Alter, Manager	10/8/92

Identification of Respondents to Program Proposal (continued)

Entities Associated with Standards and Conformity Assessment Activities  
Testing Laboratories

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
Aires Environmental Services, Ltd.	Cynthia Darling Director, Laboratory	7/23/92
Amador Corporation	Daniel D. Hollihan Chief Operating Officer	9/24/92
American Analytical Testing Services	Howard E. Holzman President	6/5/92
Azimuth Incorporated	Harriotte A. Hurley Laboratory Director	8/12/92
Batelle Pacific Northwest Laboratories	Frank C. Hood Director, Quality Programs	5/15/92
Columbia Analytical Services, Inc.	Lawrence J. Jacoby Acting Laboratory Director	6/10/92
Communication Certification Laboratory	William S. Hurst, P.E. Vice President	7/23/92
DCM Science Laboratory, Inc.	Cindy Mefford Vice President	7/23/92
Health Science Associates	Susan Browne Rosenberg Laboratory Director	7/23/92
Hygeia Environmental Laboratories Inc.	Gustavo A. Delgado Vice President	7/23/92
Carl T. Jones Corporation	Michael A. Nicolay Manager, EMC Measurement & Design	4/10/92
Lambda Research, Inc.	Paul S. Prevey President/Director of Research	6/10/92
R. J. Lee Group, Inc.	Mark L. Demyanek Manager, Environmental Assessment	7/30/92

Identification of Respondents to Program Proposal (continued)

Entities Associated with Standards and Conformity Assessment Activities  
Testing Laboratories

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
Midwest Integrated Systems Laboratories, Inc.	James W. Romlein President	6/22/92
Omnispec Corporation	Roy W. Pyles President	4/30/92
Penniman & Browne, Inc.	Herbert E. Wilgis, Jr. President	9/17/92
Retlif Testing Laboratories	Walter A. Poggi President	5/20/92
Smithers Scientific Services, Inc.	Herman K. Hochschwender Chairman of the Board	6/12/92
Spectrum Control Inc.	Angelo Fiorelli EMC Test Manager	5/21/92
TC Analytics, Inc.	Kenneth T. White President	7/29/92
Terralab Engineers International	Douglas MacGregor	4/30/92

Identification of Respondents to Program Proposal (continued)

Entities Associated with Standards and Conformity Assessment Activities  
Consultants

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
Brewer-Kleckner Education Services	Clyde Brewer Partner	4/30/92
Bruce H. Campbell Consultants	Bruce H. Campbell President	5/5/92
C. L. Carter, Jr. and Associates, Inc.	C. L. Carter, Jr. Chairman & CEO	6/17/92
Coast Quality Metrology Systems, Inc.	Rolf B. F. Schumacher President	5/7/92
Environmental Training Corporation	Reginald C. Jordan President	7/31/92
Ergonomics Inc.	Frances George Owner	9/12/92
L. Marvin Johnson and Associates, Inc.	L. Marvin Johnson President	7/20/92
Management Software International	Gary Lynn Deines President	8/27/92
August B. Mundel	August B. Mundel Professional Engineer	5/6/92
Oil Technology Services, Inc.	Andrew J. Bergman Quality Engineer	5/7/92
Omni Tech International, Ltd.	Robert W. Belfit, Jr. President & Chairman	5/4/92
Quality Management Assistance Group	Roy E. Rodgers Principal	4/25/92
Stevenson & Associates	John D. Stevenson President	5/6/92
UNC Quality Management Services	Michael E. Mercier Senior Quality Consultant	7/29/92
Foster C. Wilson	Foster C. Wilson Retired	4/9/92

Identification of Respondents to Program Proposal (continued)

Entities Associated with Standards and Conformity Assessment Activities  
Multi-Purpose Conformity Assessment Organizations

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
American Association for Laboratory Accreditation	John W. Locke President	9/8/92
American Gas Association Laboratories	Richard J. Schulte Vice President	9/23/92
Detroit Testing Laboratory, Inc.	M. Lynne Neumann Manager, Certification Services	4/21/92
Entela Laboratories	Robert Kozak Quality Assurance Manager	5/12/92
ETL Testing Laboratories, Inc.	P. T. Gusman President and Chief Operating Officer	9/29/92
MET Electrical Testing Company, Inc.	Leonard Frier President	6/1/92
NSF International	Nina I. McClelland Chairman, President and Chief Executive Officer	9/29/92
Underwriters Laboratories Inc.	Tom Castino President	9/28/92



Identification of Respondents to Program Proposal (continued)

Entities Associated with Standards and Conformity Assessment Activities

Trade Associations

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
Air-Conditioning & Refrigeration Institute	Arnold W. Braswell President	9/8/92
American Council of Independent Laboratories, Inc.	Gerald S. Allen President	9/30/92
American Petroleum Institute	Ronald L. Jones Vice President	9/29/92
American Plywood Association	Thomas R. Flint Vice President	6/18/92
Gas Appliance Manufacturers Association	Joseph M. Mattingly Director of Governmental Affairs and General Counsel	7/8/92
International Cargo Gear Bureau, Inc.	Charles G. Visconti President	7/10/92
National Marine Manufacturers Association	Lars Granholm Director, Technical Services	5/18/92
National/International Safe Transit Association	Ellis Murphy Executive Director	9/25/92

Identification of Respondents to Program Proposal (continued)

Entities Associated with Standards and Conformity Assessment Activities  
Quality System Registrars

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
ABS Quality Evaluations, Inc.	Robert C. Sutton	5/22/92
Bureau Veritas Quality International	Greg Swan President	5/22/92
Det Norske Veritas Industry, Inc.	Yehuda Dror Manager, Quality System Certification	5/15/92
Intertek	Stephen D. Sawin President	5/29/92
Quality Systems Registrars, Inc.	R. M. Kleckner President	5/12/92
Scott Technical Services	Stephen S. Keneally President	5/7/92

Entities Associated with Standards and Conformity Assessment Activities  
Certification Agencies

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
Coordinating Agency for Supplier Evaluation	John Youngblood President	9/2/92
Factory Mutual Research	John Rennie Vice President & Manager	9/24/92
The Hartford Steam Boiler Inspection and Insurance Co.	Richard E. Feigel Assistant Vice President	4/21/92
Professional Service Industries, Inc.	Randy T. Webb Division Manager	5/21/92
Society of Automotive Engineers	Jack W. Schmidt, 1992 SAE President	9/29/92
United States Testing Company, Inc.	Richard L. Gerstein President	6/3/92

Identification of Respondents to Program Proposal (continued)

Entities Associated with Standards and Conformity Assessment Activities  
Building Code Organizations

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
BOCA Evaluation Services, Inc.	Tom Frost Manager Technical Services	5/18/92
Council of American Building Officials	Richard P. Kuchnicki President	5/15/92
International Conference of Building Officials	James E. Bihr President	5/18/92
ICBO Evaluation Service, Inc.	John Nosse President	5/19/92

Entities Associated with Standards and Conformity Assessment Activities  
Professional/Technical Organizations

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
American Industrial Hygiene Association	Henry J. Muranko President	9/28/92
The American Society of Mechanical Engineers	M. R. Green Associate Executive Director	6/24/92
Cooling Tower Institute	David Hutton CTI Liaison to ANSI	7/22/92
The National Board of Boiler and Pressure Vessel Inspectors	D. J. McDonald Executive Director	5/21/92

Entities Associated with Standards and Conformity Assessment Activities  
Accreditation Bodies

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
Performance Review Institute	Robert Ray Chairman	9/25/92
Raad voor de Certificatie	Harry Gundlach Managing Director RvC	7/10/92
Registrar Accreditation Board	Robert W. Peach Chairman of the Board	9/28/92

Identification of Respondents to Program Proposal (continued)

Entities Associated with Standards and Conformity Assessment Activities  
Standards Coordination Bodies

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
American National Standards Institute	C. Reuben Autery Chairman, ANSI Board Committee on Conformity Assessment	9/16/92
United States National Committee of the International Electrotechnical Commission	R. H. Reimer President	9/25/92

Entities Associated with Standards and Conformity Assessment Activities  
Standards Committees

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
American Lumber Standards Committee	Thomas D. Searles Executive Vice President	8/31/92
American Petroleum Institute Committee on Quality	Ken Peurifoy Chairman	7/21/92

Identification of Respondents to Program Proposal (continued)

Miscellaneous  
Individuals

<b>Name or Organization</b>	<b>Respondent</b>	<b>Date</b>
	Douglas Berg	5/13/92
	Rolf M. A. Hahne	7/27/92
	Rudolf G. Kittlitz	6/5/92
	Herbert C. Monnich, Jr.	5/21/92
	Joel M. Schwartzman	5/21/92
	Andrew H. West	4/29/92

Miscellaneous  
Composite Government Advisory Committees

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
Industry Functional Advisory Committee	Barbara Boykin Assistant Vice President	9/25/92
Pressure Technology Sectoral Technical Advisory Committee	William E. Cooper Chairman	6/19/92

Identification of Respondents to Program Proposal (continued)

Public Organizations

State Government Agencies

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
Georgia Department of Agriculture	Bill Truby Assistant Commissioner	6/9/92
Michigan Department of Agriculture	Bill Schuette Director	6/11/92
Minnesota Dept. of Public Service	David A Dikken Laboratory Metrologist	6/1/92
New Jersey Department of Law and Public Safety	William J. Wolfe State Superintendent	6/9/92

Federal Government Agencies

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
Department of Energy, Office of Nuclear Safety Policy and Standards	Neal Goldenberg Director	6/20/92
Department of Transportation, Federal Aviation Administration	Renton S. Bean Manager, Production Certification Branch	7/21/92

Academia

<b>Name of Organization</b>	<b>Respondent</b>	<b>Date</b>
Florida State University	Wendy M. Cullar Program Director, Florida Schoolyear 2000	6/1/92
Rice University	Kathryn W. Cavender Director, Environmental Health and Safety	7/20/92



