NISTIR 7118

# Federal Agency and Commission Reports for FY 2003

**Supplemental Information**
**to the**

## Seventh Annual Report on Federal Agency Use of Voluntary Consensus Standards and Conformity Assessment

# Federal Agency and Commission Reports for FY 2003

## Table of Contents

# Appendix E - Cabinet Department Agencies

# Department of Agriculture

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

0

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

163

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

106

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

42

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| Accredited Standards Committee X9 | ASCX9 |
| American National Standards Institute | ANSI |
| American National Standards Institute Government Member Forum | ANSI/GMF |
| American Oil Chemists Society | AOCS |
| American Society for Testing and Materials | ASTM |
| ANSI Standards for Structured Query Language | ANSI/SQL |
| Association of Official Analytical Chemists International | AOACI |
| Back Office Services | BOS |
| Codex Ad Hoc Intergovernmental Taskforce on Fruit and Vegetable Juices | CCFVJ |
| Codex Comm. on Milk & Milk Products | CCMMP |
| Codex Committee on Pesticide Residues | CCPR |
| Codex Committee on Processed Fruits and Vegetables | CCPFV |
| Committee of Java Community Process | J2EE |
| Components Framework | CF |
| Conference of Parties to the Convention of Biological Diversity | CCBD |
| IBM Global Services Methodology | IBM/GSM |

| | |
|---|---|
| Industry-wide Cooperative Meat Identification Standards Committee | ICMISC |
| International Dairy Federation | IDF |
| International Organization for Standardization Technical Committee 176 for Quality Management and Quality Assurance | ISO TC-176 |
| International Organization for Standardization Technical Committee for Meat and Meat Products | ISO/TC 34/SC 6 |
| International Organization for Standardization/International Electrotechnical Commission | ISO/IEC |
| International Seed Testing Association | ISTA |
| International Standards Organization | ISO |
| International Union for the Protection of New Varieties of Plants | UPOV |
| J2EE National Consortium | J2EE/NC |
| Joint Financial Managers Improvement Program | JFMIP |
| Meat and Poultry Business-to Business Data Standards Organization | mpXML |
| Meat and Poultry Equipment Standards | MPES |
| National Computer Security Center | NCSC |
| National Fire Protection Association | NFPA |
| National Institute of Standards and Technology | NIST |
| National Organic Program | NOP |
| Organization for Economic Cooperation and Development Seed Schemes | OECD |
| Project Management Institute for Project Management | PMI |
| Rational Unified Process | RUP |
| Reference Architecture and Common Application Framework | RACAF |
| Sanitary Standards Program | SSP |
| Service Access and Delivery | SAD |
| Service Interface and Integration | SII |
| Service Platform and Infrastructure | SPI |
| UML National Consortium | UML/NC |
| United Nations Economic Commission for Europe | UNECE |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

C

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

A

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

A

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

USDA concurs that the standards policy stated in Circular A-119 is effective in reducing duplicate systems of standards. It effectively defines the role and coordinates the use of government-unique standards in the marketplace.

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

No comments on activities.

9. Please provide any examples or case studies of standards successes:

No examples of case studies.

10. Please provide any other comments:

The reporting tool is user-friendly.

## Department of Commerce

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

0

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

0

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

415

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

118

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| Acoustical Society of America | ASA |
| Air Transportation Association | ATA |
| Air-Conditioning and Refrigeration Institute | ARI |
| Alliance for Telecommunications Industry Solutions | ATIS |
| American Biomolecular Resource Facilities | ABRF |
| American Concrete Institute | ACI |
| American Congress on Surveying and Mapping | ACSM |
| American Dental Association | ADA |
| American Gas Association | AGA |
| American Institute of Aeronautics and Astronautics | AIAA |
| American Institute of Steel Construction | AISC |
| American National Standards Institute | ANSI |
| American Nuclear Society | ANS |
| American Physical Society | APS |
| American Society For Quality | ASQ |
| American Society for Testing and Materials International | ASTMI |
| American Society of Civil Engineers | ASCE |
| American Society of Heating, Refrigerating, and Air- | ASHRAE |

| | |
|---|---|
| Conditioning Engineers | |
| American Society of Mechanical Engineers | ASME |
| American Vacuum Society | AVS |
| American Water Works Association | AWWA |
| American Welding Society | AWS |
| Association for Information and Image Management | AIIM |
| Association of Official Analytical Chemists International | AOACI |
| Basic Linear Algebra Subprograms Technical Forum | BLAS |
| Biometric Application Programming Interface Consortium | BioAPI |
| British Standards Institution | BSI |
| Bureau of International Weights and Measures | BIPM |
| Calorimetry Conference | CalCon |
| Canadian General Standards Board | CGSB |
| College of American Pathologists | CAP |
| Common Criteria Management Committee | CCMC |
| Compressed Gas Association | CGA |
| Council for Optical Radiation Measurements | CORM |
| Dansk Standards Association (Denmark) | DS |
| Deutsches Institut fur Nomung - German Institute for Standardization | DIN |
| Electronic Book Exchange | EBX |
| Electronic Industries Alliance | EIA |
| European Computer Manufacturers Association | ECMA |
| European Conference on Thermophysical Properties | ECTP |
| European Organization for the Exploitation of Meteorological | EUMETSAT |
| Extensible Markup Language Consortium | XML |
| General Council on Weights and Measures | CGPM |
| Illuminating Engineering Society of North America | IESNA |
| Institute of Electrical and Electronic Engineers | IEEE |
| Instructional Management System | IMS |
| Instrument Society of America | ISA |
| Inter-Society Color Council | ISCC |
| Interconnecting and Packaging Printed Circuits | IPC |
| International Association for the Properties of Water and Steam | IAPWS |
| International Astronomical Union | IAU |
| International Atomic Energy Agency | IAEA |
| International Cartographic Association | ICA |
| International Civil Aviation Organization | ICAO |
| International Code Council | ICC |
| International Commission on Illumination | CIE |
| International Commission on Radiation Units and Measurements | ICRU |
| International Committee for Information Technology Standards | INCITS |
| International Council of Scientific Unions | ICSU |
| International Electrotechnical Commission | IEC |
| International Federation on Information Processing | IFIP |

| | |
|---|---|
| International Hydrographic Organization | IHO |
| International Institute of Welding | IIW |
| International Laboratory Accreditation Conference | ILAC |
| International Measurement Confederation | IMEKO |
| International Organization for Standardization | ISO |
| International Organization of Legal Metrology | OIML |
| International Telecommunication Union | ITU |
| International Union of Crystallography | IUCr |
| International Union of Laboratories and Experts in Construction Materials, Systems and Structures | RILEM |
| International Union of Pure and Applied Chemistry | IUPAC |
| International Union of Pure and Applied Physics | IUPAP |
| International Union of Radio Science | URSI |
| Internet Engineering Task Force | IETF |
| Internet Software Consortium | ISC |
| Java Grande Forum | JGF |
| Joint Committee for Gauges in Metrology | JCGM |
| Joint Electron Devices Engineering Council | JEDEC |
| National Association of Broadcasters | NAB |
| National Association of Corrosion Engineers International | NACE |
| National Association of Photographic Manufacturers | NAPM |
| National Committee for Clinical Laboratory Standards | NCCLS |
| National Conference of Standards Laboratories | NCSL |
| National Conference on Weights and Measures | NCWM |
| National Cooperation for Laboratory Accreditation | NACLA |
| National Council of Radiation Protection and Measurements | NCRPM |
| National Fire Protection Association | NFPA |
| National Information Standards Organization | NISO |
| North American Open Math Initiative | NAOMI |
| Object Management Group | OMG |
| Open eBook Forum | OeBF |
| Optical Internetworking Forum | OIF |
| Optical Society of America | OSA |
| Optical Storage Technology Association | OSTA |
| Optics and Electro-Optics Standards Council | OEOSC |
| Organization for Economic Co-operation and Development | OECD |
| Organization for the Advancement of Structured Information Standards | OASIS |
| Pan American Standards Commission | COPANT |
| Paper Industry Management Association | PIMA |
| Parallel Tools Consortium | PTOOLS |
| Radio Technical Commission for Aeronautics | RTCA |
| Robotics Industry Association | RIA |
| Safety Glazing Certification Council | SGCC |
| Semiconductor Equipment and Materials Institute | SEMI |
| Semiconductor Manufacturing Technology | SEMATECH |

| | |
|---|---|
| Society of Automotive Engineers | SAE |
| Society of Motion Picture and Television Engineers | SMPTE |
| Society for Biology | SFB |
| Technical Association for the Pulp and Paper Industry | TAPPI |
| Telecommunications Industry Association | TIA |
| U.S. Geological Society | USGS |
| U.S. Product Data Association | USPRO |
| Underwriters Laboratories | UL |
| Versailles Project on Advanced Materials and Standards | VAMAS |
| Video Electronics Standards Association | VESA |
| World Intellectual Property Organization | WIPO |
| World Meteorological Organization | WMO |
| World Wide Web Consortium | W3C |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

Not Applicable.

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

C

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

C

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

C

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

No

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

No

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

NIST believes that the Circular provides satisfactory guidance to federal agencies regarding how to comply with P.L. 104-113. On those occasions when additional clarification is needed, the Interagency Committee on Standards Policy (ICSP) has proven to be an effective forum in which agencies can work toward resolution. For example, the committee discussed again in FY 2003 uncertainties regarding what is meant by the phrase "federal agency 'use' of voluntary consensus standards". As a result of those discussions, the ICSP Chair issued a guidance memo to federal agencies for the purpose of clarifying the ways agencies should identify and report their use of standards more consistently.

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

***Telecommunications Certification Bodies (TCB) Program***

In May 2000, NIST initially evaluated American National Standards Institute's (ANSI'S) Conformity Assessment Program for compliance with ISO/IEC Guide 61 and the Federal Communications Commission (FCC) requirements for its Telecommunications Certification Bodies (TCB) program. Upon successful completion of an on-site assessment and two witness audits, NIST recognized ANSI's Conformity Assessment Program for a period of two years. In May 2002, NIST re-evaluated ANSI and extended its recognition for two more years.

ANSI evaluates prospective TCBs for compliance with ISO/IEC Guide 65 and FCC requirements for the TCB program. FCC requires that a TCB must have core testing capability and that the testing laboratory must be accredited to ISO/IEC Standard 17025. NIST recommends thus accredited organizations to FCC for designation as TCBs. As of December 2003, NIST recommended 17 TCBs and confirmed by the FCC. The number of TCBs may increase or decrease according to the market demand.

***Asia-Pacifica Economic Cooperation for Telecommunications and Information, Mutual Recognition Arrangement (APEC Tel MRA)***

Under Phase-II of the APEC Tel MRA, NIST is responsible for qualifying and designating Certification Bodies (CBs) or U.S. Conformity Assessment Bodies (CABs) for a specific economy's technical requirements. As a part of this process, NIST in 2003 expanded ANSI's scope for certification bodies to include Canadian Government (Industry Canada) requirements. On behalf of NIST, ANSI will qualify CBs/CABs to ISO/IEC Guide 65 and Industry Canada's technical requirements. The CBs/CABs will provide product certification services to U.S. manufacturers and facilitate trade. As of December 2003, ANSI qualified 7 CBs/CABs. In January 2004, NIST reviewed CAB qualifications and nominated 7 U.S. CABs to Industry Canada for their recognition.

Under Phase-I of the APEC Tel MRA, NIST is responsible for qualifying and designating U.S. CABs for a specific economy's technical requirements. Under NIST-NACLA memorandum of understandings (MOU), NACLA evaluates and recognize accreditors of testing laboratories for compliance with ISO/IEC Guide 58 and importing APEC economy's technical requirements. As a part of this MOU, NACLA recognized The American Association of Laboratory Accreditation (A2LA) and National Voluntary Laboratory Accreditation Program (NVLAP). Both A2LA and NVLAP qualify laboratories for compliance with ISO/IEC Standard 17025 and importing APEC economy's technical requirements. In Phase-I, NIST designated 114 testing laboratories (U.S. CABs) to four APEC economies which were accredited by A2LA and NVLAP. These CABs test products for foreign requirements and facilitate trade. The number of U.S. CABs may increase or decrease according to the market demand.

***NIST Committee Participation***

NIST's Standards Services Division (NIST/SSD) participates in the ANSI International Conformity Assessment Committee (ICAC), which serves as the U.S. Technical Advisory Group (TAG) to ISO's Council Committee on Conformity Assessment (CASCO). SSD staff also participates in CASCO Working Group 25 on alignment of ISO/IEC 17025 with ISO 9000/2000, Working Group 22 on a code of good practice for conformity assessment, and Working Group 20 on the revision of ISO/IEC Guide 7 on the inclusion of conformity assessment requirements in standards. Further, SSD staff is active in a CASCO ad hoc group on Regulators Interface and in working groups of the International Accreditation Forum (IAF).

NIST/SSD personnel serve on the ANSI committee that is responsible for accrediting certification bodies and on the U.S. National Committee to the IECEE (IEC System for Conformity testing and Certification of Electrical Equipment). The latter is a worldwide scheme that allows manufacturers to obtain a test certificate from an approved U.S. National Certification Body (NCB) and to use this test report to obtain certification marks in other participating countries.

NIST/SSD also participates in the U.S Technical Advisory Group (TAG) to ISO TC 176, the ISO committee responsible for the development and maintenance of the ISO 9000 standards series, and in American Society for Quality (ASQ) Z-1, the U.S. committee responsible for adoption of the ISO 9000 series as U.S. national standards.

The Director, Standards Services Division serves as the Chair of the ANSI-Registrar Accreditation Board (RAB) National Accreditation Program (NAP) Environmental Management Systems (EMS) Council. The Council is responsible for accrediting registrars that assess facilities for conformance to the ISO 14001 standard.

Finally, NIST/SSD has published a number of directories and reports on conformity assessment-related issues and maintains a Web site (http://www.ts.nist.gov/ca) that provides a one-stop-shopping source for information on various conformity assessment

issues.

***National Cooperation for Laboratory Accreditation (NACLA)***

Section 12b of the National Technology Transfer and Advancement Act (NTTAA) of 1995 directed NIST to coordinate conformity assessment activities of federal, state, and local entities to eliminate any unnecessary duplication of conformity assessment activities. In response, NIST has been a driving force behind the creation of NACLA. NACLA is composed of organizations in the United States, with observers from Mexico and Canada that actively support development of a system for recognizing the competence of testing and calibration laboratories leading to worldwide acceptance of test and calibration reports from those laboratories. Concerned with costly, multiple, duplicate assessments, and the lack of domestic or international recognition of laboratory accreditations, the group has explored solutions that could lead the United States, and perhaps eventually its North American Free Trade Agreement (NAFTA) partners, toward the goal of having only one assessment of a laboratory in a given field of testing, based on internationally accepted procedures. The NACLA vision is for a U.S. laboratory accreditation system that achieves the following goals:

• For the testing laboratory, a single accreditation in a given field of testing, with worldwide recognition of the laboratory's competence.

• For the manufacturer/supplier, a test performed once, with worldwide acceptance.

• For the acceptance body (that is a government agency or an industry specifier); an accreditation based on uniform criteria and intended to ensure that a laboratory is qualified to provide data of consistent quality.

In the past year, NACLA took a number of steps to continue to improve its system for evaluating U.S. accrediting bodies and to increase the public's understanding of that system.

• Revised the protocols for appointment of Lead Evaluators, individuals who play a crucial role in the evaluation of applicant accreditation bodies. Two key Board decisions were: to use the services of Lead Evaluators from international accreditation cooperations, like APLAC; and to pay a per diem stipend to these all Lead Evaluators. The modifications will help to expand the pool of qualified Lead Evaluators and increase the efficiency of the NACLA system.

• Revised and updated the terms and conditions of the NACLA Mutual Recognition Arrangement (MRA). This is the document that is signed by all accreditation bodies that are recognized by NACLA. Among other obligations, it requires all signatory bodies to accept test and calibration data from laboratories accredited by other MRA signatories.

• Published - and posted on the NACLA web site (www.nacla.net) - an information White Paper entitled, NACLA's Important Mission and Current Status: How NACLA

Evaluates and Recognizes Laboratory Accreditation Bodies. The document has helped to educate stakeholders about the NACLA evaluation-recognition process and to clarify misperceptions about NACLA in the marketplace.

• Held a two-day planning retreat of the NACLA Board of Directors-Operations Council. The result of the retreat is a series of strategies and tactics to enhance NACLA's operational effectiveness and financial stability.

• Most importantly, NACLA and NIST revised and renewed the memorandum of understanding (MOU) between the two organizations. Under the renewed MOU, NIST will continue to recognize NACLA as a suitable private-sector alternative to NIST's National Voluntary Conformity Assessment System Evaluation (NVCASE) program. NIST relies on NACLA recognition of qualified accreditation bodies in support of NIST responsibilities as a designating authority under the U.S.-European Union Mutual Recognition Agreement (MRA), the APEC Telecommunications MRA, and the Inter-American Telecommunications Commission (CITEL MRA. A total of more than 100 laboratories have been designated as Conformity Assessment Bodies (CABs) under the provisions of the U.S.-EU and APEC MRA's, pursuant to this MOU.

National Voluntary Laboratory Accreditation Program – NIST/SSD's National Voluntary Laboratory Accreditation Program (NVLAP) operates in conformance with ISO Guide 58 and accredits calibration and testing laboratories to ISO/IEC 17025. NVLAP operates programs in support of several federal agencies, including the Department of Energy, the Nuclear Regulatory Commission, the Food and Drug Administration, the Department of Defense, the Environmental Protection Agency, the Federal Communications Commission, and in support of state and local governments.

National Information Assurance Partnership (NIAP) – NIST and the National Security Agency have established a program under the National Information Assurance Partnership (NIAP) to evaluate IT product conformance to international standards. The program, officially known as the NIAP Common Criteria Evaluation and Validation Scheme for IT Security or Common Criteria Scheme, is a partnership between the public and private sectors. NIAP assessment programs are based on national and international IT security standards and criteria. Present IT product testing programs include the NIAP Common Criteria Evaluation and Validation Program (see more at http://niap.nist.gov/cc-scheme/) and the NIST Cryptographic Module Validation Program (see http://csrc.nist.gov/cryptval/)

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9. Please provide any examples or case studies of standards successes:

***FREE CD DEMYSTIFIES COMPLEX STANDARDS SYSTEM***

A new CD from the National Institute of Standards and Technology (NIST) can help steer engineers, novice trade-association representatives and new government staffers through the thicket of organizations, activities, policies and laws related to standards and measurement in the United States.

With an easily digested helping of technical detail, the free electronic primer* provides an integrated view of major public and private-sector components of the nation's measurement and standards system. These elements are sized up from several key perspectives, including global trade and regulatory affairs.

Capsulated descriptions are supplemented by pointers to copies of trade agreements, federal laws and other background documents. Links to relevant Internet resources, such as Web sites of standards development organizations and regional measurement alliances, are found throughout. For example, the section on conformity assessment (the umbrella term for testing and other means of assessing whether a product meets regulatory and customer requirements) contains pointers to copies of international agreements and other efforts to harmonize such formal requirements. It also features links to multinational organizations working to eliminate duplication or needless variation in the standards and regulations of trading partners.

Five major sections survey relevant topics and activities in the areas of measurements, standards, conformity assessment, regulations and global activities. An additional section describes NIST, its programs, and it's supporting technical roles and services.

To get a copy of the compendium-like CD, contact the editor, Elisabeth Parker, at (301) 975-3089; or elisabeth.parker@nist.gov.

*NEW STANDARD HELPS MAKE SOFTWARE EASIER TO USE*

Nothing drives people more crazy than software programs that are poorly designed, inappropriate for specific tasks and, in general, difficult to use. Employee frustration, wasted work time and decreased productivity attributable to software that isn't usable can be costly for both businesses and individuals.

To help remedy the problem, computer scientists at the National Institute of Standards and Technology (NIST) teamed with U.S. companies to develop a standard way to test and evaluate software usability. The product of the team's effort, the Common Industry Format (CIF) for Usability Test Reports, recently was approved by the American National Standards Institute (ANSI).

Several pilot studies by companies such as The Boeing Co., Oracle Corp. and Microsoft Corp. have verified the new standard's usefulness. In fact, aerospace manufacturer Boeing partnered with Oracle, a large supplier of database products, to conduct joint tests of the CIF. This has resulted in software that both companies agree is more effective.

Now that the value of the CIF has been demonstrated, NIST is considering expanding its work to focus on improving usability of next-generation computer devices such as handhelds.

***STANDARDS TO HELP MANUFACTURERS MEASURE MICRO-MACHINE***

***PROPERTIES***

When a car collides with another car, a tiny device called an accelerometer detects the change in motion and sets off an air bag, an innovation that has saved many lives.

The accelerometer is one of the most common uses of micro-electromechanical systems (MEMS), but scientists and engineers also are starting to use them in devices ranging from angioplasty pressure sensors and pacemakers to optical disk drives.

MEMS, also known as micro-machines, are a relatively new technology that uses existing microelectronics manufacturing methods to create complex machines with micrometer feature sizes. MEMS devices represent a rapidly growing component of the semiconductor industry. Many micro-machines contain moving parts that are combined with integrated circuits. Like most high-tech devices, they must be made with precise dimensions and materials properties to operate properly. To help manufacturers ensure that their devices meet these exacting specifications, National Institute of Standards and Technology scientists and engineers helped develop three ASTM International standard test methods for the thin films used to make micro-machines.

The test procedures, which are the first such standards in the world, will be published in The Annual Book of ASTM International Standards this month. The standards are expected to facilitate global commerce in MEMS technologies by enabling measurements that will lead to the development of more reliable and reproducible MEMS devices. The three standards provide detailed instructions for measuring thin-film dimensions and "strain," a property related to the stress in the thin film. NIST researchers have created a Web site to help semiconductor manufacturers perform the complex mathematical calculations required by the new standard test methods. For further information, see www.eeel.nist.gov/812/test-structures.

10. Please provide any other comments:

***DOC STANDARDS COMMITTEE PARTICIPATION***

The Department of Commerce encourages its staff to participate in standards committee activities relating to the mission of the Department, subject to resource availability. Agency employees participate in the standards development activities of U.S. private sector standardization bodies; local, state, and federal governments; and both private and governmental (treaty and non-treaty) international standardization organizations. Standards of interest to the Department cover a broad range of technical areas including: (1) energy conservation, (2) information and computer technology, (3) telecommunications, (4) environmental safety and health, (5) meteorological work, and (6) a variety of other product sectors and fields of technology.

The Standards Committee Participation (SCP) database maintained by the National Institute of Standards and Technology (NIST) collects and disseminates information on DOC staff participation in standards development activities.

Four hundred forty three DOC staff participated in the standards writing activities of 118 (89 national and 37 international) standards developing organizations. Because of the volume of NIST participants relative to the remaining DOC agencies, the DOC standards participant information contained in the SCP database is divided into two parts -- NIST and other (non-NIST) DOC agencies. Therefore, the data presented below is separated accordingly.

NIST Participation

NIST had 391 participants in the activities of 117 standards development organizations. NIST participated on 446 committees and held 1,304 memberships on these committees. Ten of the standards organizations in which NIST staff members participated had 20 or more memberships (see below). These organizations accounted for 70 percent (908) of the 1,304 memberships:

Organizations with NIST Memberships:

ASTM 459
American National Standards Institute 91
International Organization for Standardization 76
American Society of Mechanical Engineers 73
Institute of Electrical and Electronic Engineers 59
International Electrotechnical Commission 44
International Commission on Illumination 29
Telecommunications Industry Association 27
General Council on Weights and Measures 27
American Concrete Institute 23
Total 908

Other Department of Commerce Participation

Fifty-two staff members of other (non-NIST) DOC agencies participated in the activities of 26 standards development organizations. They participated on 51 committees and held 94 memberships on these committees. Nine of those standards organizations in which DOC staff members participated had five or more memberships (see below). These organizations/agencies accounted for 66 percent (62) of the 94 DOC committee memberships:

Organizations with DOC Memberships

American National Standards Institute 11
International Committee for Information Technology 8
International Organization for Standardization 8
Federal Committee for Meteorological Services and Supporting Research 7

Dept. of Defense/Federal Aviation Administration/Dept. of Commerce 6
International Telecommunications Union - Radio 6
Telecommunications Industry Association 6
Dept. of State 5
Institute of Electrical and Electronic Engineers 5
Total 62

## ***NATIONAL CENTER FOR STANDARDS AND CERTIFICATION INFORMATION (NCSCI)***

NCSCI is the U.S. source for standards and standards-related information at home and abroad. The Center provides information on U.S., foreign, regional, and international voluntary standards, mandatory government regulations, and conformity assessment procedures for nonagricultural products. Resources include an extensive collection of reference materials, including U.S. military and other Federal Government specifications, U.S. industry and national standards, international standards, and selected foreign national standards. NCSCI responds to requests for specialized standards information, provides contact points for translations of foreign standards and regulations, and disseminates information to U.S. industry concerning proposed foreign regulations and general standards issues.

In fulfillment of U.S. obligations under the World Trade Organization (WTO) Agreement on Technical Barriers to Trade (TBT) and the North American Free Trade Agreement (NAFTA), NCSCI serves as the U.S. national Inquiry Point and national Notification Authority. Signatories to the WTO TBT Agreement are required to notify the WTO Secretariat in Geneva of proposed technical regulations that could affect world trade and provide a 60-day comment period for review and comment by other WTO Members. NCSCI disseminates the WTO summary notifications at no charge through a web-based email subscription service, Export Alert! NCSCI also acquires the full text of the proposed technical regulations from the relevant foreign inquiry point and distributes it to interested U.S. industries.

NCSCI is the U.S. member of the International Organization for Standardization (ISO) Information Network (ISONET). NCSCI networks with other national standards organizations to exchange standards-related information and share access to foreign trade-related standards, technical regulations, and conformity assessment procedures.

## ***FEDERAL INFORMATION PROCESSING STANDARDS (FIPS)***

Under the Federal Information Security Management Act (FISMA), TITLE III of the E-Government Act of 2002, the Secretary of Commerce approves standards and guidelines that are developed by NIST for federal computer systems. This includes standards and guidelines needed to ensure the cost-effective security and privacy of sensitive information in federal computer systems, when there are compelling federal requirements and there are no existing voluntary industry standards. These standards and guidelines are

issued by NIST as FIPS for use Government-wide. FIPS address federal requirements for the interoperability of different systems, for the portability of data and software, and for computer security. When FIPS are considered necessary, NIST announces proposed FIPS in the Federal Register for public review and comment.

During FY2003, NIST made the following FIPS announcements:

On March 4, 2003, NIST announced in the Federal Register the proposed withdrawal of 17 FIPS. Some of these FIPS adopt voluntary industry standards for Federal government use, but the FIPS documents have not been updated to reference current or revised voluntary industry standards. Other FIPS adopt data standards that are developed and used by other federal government agencies. These FIPS have not been updated to reflect changes and modifications in the data representations. The remaining FIPS provide advisory guidance to federal agencies on computer security issues. This advisory guidance, which has no requirements for compulsory and binding use, has been updated by NIST and issued in more recent recommendations and publications. The FIPS proposed for withdrawal are:

FIPS 8-6, Metropolitan Areas (Including MSAs, CMSAs, PMSAs, and NECMAs)
FIPS 9-1, Congressional Districts of the U.S.
FIPS 31, Guidelines for Automatic Data Processing Physical Security and Risk Management
FIPS 48, Guidelines on Evaluation of Techniques for Automated Personal Identification
FIPS 55-3, Codes for Named Populated Places, Primary County Divisions, and Other Location Entities of the United States, Puerto Rico, and the Outlying Areas
FIPS 66, Standard Industrial Classification (SIC) Codes
FIPS 73, Guidelines for Security of Computer Applications
FIPS 83, Guideline on User Authentication Techniques for Computer Network Access Control
FIPS 87, Guidelines for ADP Contingency Planning
FIPS 92, Guideline for Standard Occupational Classification (SOC) Codes
FIPS 95-2, Codes for the Identification of Federal and Federally Assisted Organizations
FIPS 102, Guideline for Computer Security Certification and Accreditation
FIPS 112, Password Usage
FIPS 127-2, Database Language SQL (ANSI X3.135-1992)
FIPS 159, Detail Specification for 62.5-um Core Diameter/125-um Cladding Diameter Class 1A Multimode, Graded-Index Optical Waveguide Fibers
FIPS 171, Key Management Using ANSI X9.17
FIPS 173-1, Spatial Data Transfer Standard

After a 90-day public review period, NIST addressed all comments received from the public, and the withdrawal of the 17 FIPS now awaits final approval by the Secretary of Commerce.

In a Federal Register notice dated May 16, 2003, NIST announced the first draft of FIPS 199, Standards for Security Categorization of Federal Information and Information

Systems. After a 90-day public review period, NIST revised the document based on comments received, and it now awaits final approval by the Secretary of Commerce.

***SUMMARY OF STANDARDS-RELATED ACTIVITIES - DOC BUREAUS (EXCLUDING NIST):***

International Trade Administration (ITA) – The ITA participates in four CODEX committees, one ICAO committee and one committee of the U.S.-Russia Working Group Standards for Chemicals. This year, ITA's work in standards furthered toy safety standardization and international civil aviation standards adoption and acceptance worldwide.

National Oceanic and Atmospheric Administration (NOAA) – Standardization of data acquisition and data management practices are vital to the mission at NOAA. NOAA seeks to establish voluntary standards with selected industrial associations, academia, and national organizations of state and local governments (e.g., the American Association of State Climatologists), as well as through participation in professional societies (e.g., American Meteorological Society). All NOAA line organizations participate in standards development activities. In general, standards used in many NOAA activities are established in conjunction with other federal agencies (e.g., DOD, Federal Aviation Administration, U.S. Department of Agriculture, and the Federal Geographic Data Committee) either through joint participation in international organizations such as the World Meteorological Organization, or by means of bilateral and multilateral agreements with other nations. These standardization activities apply to all phases of environmental data acquisition, processing, and distribution.

National Telecommunications and Information Administration (NTIA) – The NTIA contributes to the development and application of national and international telecommunication standards by participating and holding leadership roles in various voluntary standards committees at the national and international levels (e.g., Telecommunications Industry Association, International Telecommunication Union). These standards enhance the quality and reliability of the domestic telecommunications infrastructure, promote healthy competition in telecommunications products and services, and expand international trade opportunities for U.S. telecommunications firms.

United States Patent and Trademark Office (USPTO) - The USPTO participates and contributes to the resolution of identified requirements for international standards, primarily through the Standing Committee on Information Technologies of the World Intellectual Property Organization. USPTO staff also participates in standardization activities of the International Patent Classification Union and the ANSI-Accredited Committee on Patent Standards.

Bureau of the Census – DOC's Bureau of the Census is active in the development of standards and specifications for: (1) the capture and storage of geographic information in computer-readable formats along with metadata documenting the characteristics of those

data; and (2) the definitions of statistical, economic, and geographic terms. The Census Bureau participated in the following groups in FY 2000: Federal Geographic Data Committee -- various subcommittees and working groups; ANSI/NCITS-L1 Geographic Information Systems; ISO Technical Committee 211; Ad hoc Baseline Committee on the U.S. International Boundary; U.S.G.S. Spatial Data Transfer Standards (SDTS) Technical Review Board; International Cartographic Association, Commission on National and Regional Atlases; U.S.G.S. National Atlas of the United States Steering Committee; and the Open GIS Consortium (OGC).

# Department of Defense

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

This agency reports voluntary consensus standards usage on a categorical basis.

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

156

| Voluntary Standard | Government Standard |
|---|---|
| ASTM-B221 | QQ-A-200 |
| ASTM-B221/1 | QQ-A-200/1 |
| ASTM-B221/2 | QQ-A-200/2 |
| ASTM-B221/3 | QQ-A-200/3 |
| ASTM-B221/4 | QQ-A-200/4 |
| ASTM-B24 | QQ-A-200 |
| ASTM-B24/1 | QQ-A-200/1 |
| ASTM-B241 | QQ-A-200 |
| ASTM-B241/10 | QQ-A-200/10 |
| ASTM-B241/2 | QQ-A-200/2 |
| ASTM-B241/3 | QQ-A-200/3 |
| ASTM-B241/4 | QQ-A-200/4 |
| ASTM-B308 | QQ-A-200 |
| ASTM-B308/1 | QQ-A-200/1 |
| ASTM-B308/2 | QQ-A-200/2 |
| ASTM-B308/3 | QQ-A-200/3 |
| ASTM-B308/4 | QQ-A-200/4 |
| ASTM-B42 | MS14302 |
| ASTM-F104 | HH-C-576 |
| AWS-C2.25 | MIL-W-6721 |

| | |
|---|---|
| MIL-R-83485 | MIL-R-83485 |
| MIL-R-83485/1 | MIL-R-83485/1 |
| NASM45595 | MIL-W-45595 |
| PIA-PS22014 | MS22014 |
| PIA-PS22040 | MS22040 |
| PIA-PS22042 | MS22042 |
| PIA-PS22043 | MS22043 |
| PIA-PS22045 | MS22045 |
| PIA-PS24553 | MS24553 |
| PIA-PS27762 | MS27762 |
| PIA-PS27763 | MS27763 |
| PIA-PS27764 | MS27764 |
| PIA-PS27765 | MS27765 |
| PIS-PS22046 | MS22046 |
| PIS-PS22047 | MS22047 |
| SAE-AMS-6444 | MIL-S-7420 |
| SAE-AMS-C-26074 | MIL-DTL-26074 |
| SAE-AMS-H-81200 | MIL-H-81200 |
| SAE-AMS-P-5516 | MIL-P-5516 |
| SAE-AMS-QQ-A-200 | QQ-A-200 |
| SAE-AMS-QQ-A-200/1 | QQ-A-200/1 |
| SAE-AMS-QQ-A-200/2 | QQ-A-200/2 |
| SAE-AMS-QQ-A-200/3 | QQ-A-200/3 |
| SAE-AMS-QQ-A-200/4 | QQ-A-200/4 |
| SAE-AMS-R-83285 | MIL-R-83285 |
| SAE-AMS-R-83412 | MIL-R-83412 |
| SAE-AMS-R-83412/1 | MIL-R-83412/1 |
| SAE-AMS-T-6736 | MIL-T-6732 |

| | |
|---|---|
| SAE-AMS6322 | MIL-S-6049 |
| SAE-AMS6325 | MIL-S-6049 |
| SAE-AMS6327 | MIL-S-6049 |
| SAE-AMS6470 | MIL-S-6709 |
| SAE-AMS6472 | MIL-S-6709 |
| SAE-AMS6747 | MIL-S-7420 |
| SAE-AS15000 | MS15000 |
| SAE-AS15001 | MS15001 |
| SAE-AS15003 | MS15003 |
| SAE-AS15721 | MS15721 |
| SAE-AS21440 | MS21440 |
| SAE-AS21924 | MS21903 |
| SAE-AS24461 | MS24461 |
| SAE-AS24462 | MS24462 |
| SAE-AS27444 | MIL-N-27444 |
| SAE-AS5201 | MS3367A |
| SAE-AS7413 | MIL-C-7413 |
| SAE-AS81934 | MS21240 |
| SAE-AS81934/2 | MS21241 |
| SAE-AS81935/2 | MS21243 |
| SAE-AS85049/1 | MIL-C-85049/1 |
| SAE-AS85049/10 | MIL-C-85049/10 |
| SAE-AS85049/11 | MIL-C-85049/11 |
| SAE-AS85049/14 | MIL-C-85049/14 |
| SAE-AS85049/15 | MIL-C-85049/15 |
| SAE-AS85049/16 | MIL-C-85049/16 |
| SAE-AS85049/17 | MIL-C-85049/17 |
| SAE-AS85049/18 | MIL-C-85049/18 |

| | |
|---|---|
| SAE-AS85049/19 | MIL-C-85049/19 |
| SAE-AS85049/2 | MIL-C-85049/2 |
| SAE-AS85049/20 | MIL-C-85049/20 |
| SAE-AS85049/21 | MIL-C-85049/21 |
| SAE-AS85049/218 | MIL-C-85049/28 |
| SAE-AS85049/22 | MIL-C-85049/22 |
| SAE-AS85049/23 | MIL-C-85049/23 |
| SAE-AS85049/24 | MIL-C-85049/24 |
| SAE-AS85049/25 | MIL-C-85049/25 |
| SAE-AS85049/26 | MIL-C-85049/26 |
| SAE-AS85049/27 | MIL-C-85049/27 |
| SAE-AS85049/29 | MIL-C-85049/29 |
| SAE-AS85049/3 | MIL-C-85049/3 |
| SAE-AS85049/30 | MIL-C-85049/30 |
| SAE-AS85049/31 | MIL-C-85049/31 |
| SAE-AS85049/32 | MIL-C-85049/32 |
| SAE-AS85049/33 | MIL-C-85049/33 |
| SAE-AS85049/34 | MIL-C-85049/34 |
| SAE-AS85049/35 | MIL-C-85049/35 |
| SAE-AS85049/36 | MIL-C-85049/36 |
| SAE-AS85049/37 | MIL-C-85049/37 |
| SAE-AS85049/38 | MIL-C-85049/38 |
| SAE-AS85049/39 | MIL-C-85049/39 |
| SAE-AS85049/4 | MIL-C-85049/4 |
| SAE-AS85049/40 | MIL-C-85049/40 |
| SAE-AS85049/41 | MIL-C-85049/41 |
| SAE-AS85049/42 | MIL-C-85049/42 |
| SAE-AS85049/43 | MIL-C-85049/43 |

| | |
|---|---|
| SAE-AS85049/44 | MIL-C-85049/44 |
| SAE-AS85049/45 | MIL-C-85049/45 |
| SAE-AS85049/46 | MIL-C-85049/46 |
| SAE-AS85049/47 | MIL-C-85049/47 |
| SAE-AS85049/48 | MIL-C-85049/48 |
| SAE-AS85049/49 | MIL-C-85049/49 |
| SAE-AS85049/5 | MIL-C-85049/5 |
| SAE-AS85049/50 | MIL-C-85049/50 |
| SAE-AS85049/51 | MIL-C-85049/51 |
| SAE-AS85049/52 | MIL-C-85049/52 |
| SAE-AS85049/53 | MIL-C-85049/53 |
| SAE-AS85049/54 | MIL-C-85049/54 |
| SAE-AS85049/55 | MIL-C-85049/55 |
| SAE-AS85049/56 | MIL-C-85049/56 |
| SAE-AS85049/57 | MIL-C-85049/57 |
| SAE-AS85049/58 | MIL-C-85049/58 |
| SAE-AS85049/59 | MIL-C-85049/59 |
| SAE-AS85049/6 | MIL-C-85049/6 |
| SAE-AS85049/60 | MIL-C-85049/60 |
| SAE-AS85049/61 | MIL-C-85049/61 |
| SAE-AS85049/62 | MIL-C-85049/62 |
| SAE-AS85049/63 | MIL-C-85049/63 |
| SAE-AS85049/64 | MIL-C-85049/64 |
| SAE-AS85049/65 | MIL-C-85049/65 |
| SAE-AS85049/69 | MIL-C-85049/69 |
| SAE-AS85049/7 | MIL-C-85049/7 |
| SAE-AS85049/74 | MIL-C-85049/74 |
| SAE-AS85049/75 | MIL-C-85049/75 |

| | |
|---|---|
| SAE-AS85049/76 | MIL-C-85049/76 |
| SAE-AS85049/77 | MIL-C-85049/77 |
| SAE-AS85049/78 | MIL-C-85049/78 |
| SAE-AS85049/79 | MIL-C-85049/79 |
| SAE-AS85049/8 | MIL-C-85049/8 |
| SAE-AS85049/80 | MIL-C-85049/80 |
| SAE-AS85049/81 | MIL-C-85049/81 |
| SAE-AS85049/82 | MIL-C-85049/82 |
| SAE-AS85049/83 | MIL-C-85049/83 |
| SAE-AS85049/84 | MIL-C-85049/84 |
| SAE-AS85049/85 | MIL-C-85049/85 |
| SAE-AS85049/86 | MIL-C-85049/86 |
| SAE-AS85049/87 | MIL-C-85049/87 |
| SAE-AS85049/88 | MIL-C-85049/88 |
| SAE-AS85049/89 | MIL-C-85049/89 |
| SAE-AS85049/9 | MIL-C-85049/9 |
| SAE-AS85049/90 | MIL-C-85049/90 |
| SAE-AS85049/91 | MIL-C-85049/91 |
| SAE-AS85049/92 | MIL-C-85049/92 |
| SAE-AS85049/93 | MIL-C-85049/93 |
| SAE-AS85049/94 | MIL-C-85049/94 |
| SAE-AS85049/95 | MIL-C-85049/95 |
| SAE-AS85049/96 | MIL-C-85049/96 |
| SAE-AS8879 | MIL-S-8879 |
| SSPC-PAINT 30 | MIL-P-46105 |

3. Please provide the number of voluntary consensus standards used during FY 2003?

207

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

450

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

55

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| Aerospace Industries Association of America | AIA |
| Alliance for Telecommunications Industry Solutions | ATIS |
| American Association of Textile Chemists and Colorists | AATCC |
| American Bearing Manufacturers Association | ABMA |
| American Boat and Yacht Council | ABYC |
| American Concrete Institute | ACI |
| American Conference of Governmental Industrial Hygienists | ACGIH |
| American Industrial Hygiene Association | AIHA |
| American Leather Chemists Association | ALCA |
| American National Standards Institute | ANSI |
| American Petroleum Institute | API |
| American Railway Engineering & Maintenance-of-Way Association | AREMA |
| American Society for Nondestructive Testing | ASNT |
| American Society for Testing and Materials International | ASTMI |
| American Society of Civil Engineers | ASCE |
| American Society of Heating, Refrigerating, and Air-Conditioning Engineers | ASHRAE |
| American Society of Mechanical Engineers | ASME |
| American Society of Quality Control | ASQC |
| American Water Works Association | AWWA |
| American Welding Society | AWS |
| Canadian General Standards Board | CGSB |
| Cordage Institute | CI |
| Data Interchange Standards Association, Inc. | DISAI |
| Electronic Commerce Code Management Association | ECCMA |
| Electronic Components Assemblies & Materials Association | ECAMA |
| Electronic Industries Alliance | EIA |
| Electrostatic Discharge Association | EDA |
| Government Electronics & Information Technology Association | GEITA |
| High Frequency Industry Association | HFIA |
| Illuminating Engineering Society of North America | IES |
| Information Technology Industry Council | ITI |

| | |
|---|---|
| Institute for Interconnecting and Packaging Electronic Circuits | IPEC |
| Institute of Electrical and Electronic Engineers | IEEE |
| International Committee for Information Technology Standards | INCITS |
| International Electrotechnical Commission | IEC |
| International Organization for Standardization/International Electrotechnical Commission | ISO/IEC |
| Internet Engineering Task Force | IETF |
| Joint Electron Device Engineering Council | JEDEC |
| Master Painters Institute | MPI |
| NACE International | NACE |
| National Association of Relay Manufacturers | NARM |
| National Electrical Manufacturers Association | NEMA |
| National Fire Protection Association | NFPA |
| National Institute of Building Sciences | NIBS |
| Parachute Industry Association | PIA |
| Simulation Interoperability Standards Organization | SISO |
| Society for Protective Coatings | SSPC |
| Society of Allied Weight Engineers | SAWE |
| Society of Automotive Engineers | SAE |
| Telecommunications Industry Association | TIA |
| The Open Group | TOG |
| UN Centre for Facilitation of Procedures & Practices for Administration, Commerce, & Transport | UNCFPPA |
| Underwriters Laboratories | UL |
| Workflow Management Coalition | WMC |
| World Wide Web Consortium | W3C |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

The Department of Defense reports voluntary consensus standards usage on a categorical basis.

The total number of voluntary consensus standards contained in our document database is 8803.

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

A

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

A

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

A

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

The A-119 policy does mandate that government agencies review at least once a year their respective voluntary consensus standards programs. This mandate is an excellent means of determining if agencies are relying on government-unique standards to a greater extent than is necessary. While the ICSP members made great strides at determining the exact meaning of the term "usage" the Department believes that confusion regarding reporting still persists. The Department reiterates again this year the necessity for OMB to include language explaining the term "usage" in a future revision of A-119.

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

The Department has opted out of reporting conformity assessment activities.

9. Please provide any examples or case studies of standards successes:

The following are Department of Defense FY03 Case Studies:

*Army Battery Standardization - Rechargeable Batteries Power the Future Force*

The case study illustrates how the U.S. Army slashed operational support costs while improving performance of portable power for military vehicles and communications-electronics devices through standardization and improved technology.

*Hull Mechanical and Electronic Equipment Standardization Program*

This case describes how the Navy is dramatically increasing standardization of hull mechanical and electrical equipment across Navy ships, thereby conserving money, manpower, and time, while improving the operational readiness and availability of the fleet.

10. Please provide any other comments:

## Department of Education

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

0

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

17

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

2

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

1

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| American National Standards Institute | ANSI |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

C

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

C

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

C

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

9. Please provide any examples or case studies of standards successes:

10. Please provide any other comments:

# Department of Energy

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

0

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

1187

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

674

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

85

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| Air Movement and Control Association | AMCA |
| Air-Conditioning & Refrigeration Institute | ARI |
| American Architectural Manufacturers Association | AAMA |
| American Association of State Highway and Transportation Officials | AASHTO |
| American Chemical Society | ACS |
| American Concrete Institute | ACI |
| American Industrial Hygiene Association | AIHA |
| American Institute of Steel Construction | AISC |
| American Iron and Steel Institute | AISI |
| American Medical Association | AMA |
| American National Standards Institute | ANSI |
| American Nuclear Society | ANS |
| American Petroleum Institute | API |
| American Public Health Association | APHA |
| American Railway Engineering & Maintenance-of-Way Association | AREMA |
| American Society for Nondestructive Testing | ASNT |

| | |
|---|---|
| American Society For Quality | ASQ |
| American Society for Testing and Materials | ASTM |
| American Society of Civil Engineers | ASCE |
| American Society of Heating, Refrigerating, and Air-Conditioning Engineers | ASHRAE |
| American Society of Mechanical Engineers | ASME |
| American Trucking Association | ATA |
| American Water Works Association | AWWA |
| American Welding Society | AWS |
| Asphalt Roofing Manufacturers Association | ARMA |
| Associated Air Balance Council | AABC |
| Association for Information and Image Management | AIIM |
| Building Officials and Code Administrators International | BOCA |
| Ceilings and Interior Systems Construction Association | CISCA |
| Chemical Manufacturers Association | CMA |
| Compressed Gas Association | CGA |
| Construction Safety Association of Ontario | CSAO |
| Cooling Tower Institute | CTI |
| Crane Manufacturing Association of America | CMAA |
| Electronic Industries Alliance | EIA |
| Factory Mutual Research Corporation | FMRC |
| Glass Association of North America | GANA |
| Gypsum Association | GA |
| Illuminating Engineering Society of North America | IES |
| Institute of Electrical and Electronic Engineers | IEEE |
| Institute of Makers of Explosives | IME |
| Institute of Transportation Engineers | ITE |
| Insulated Steel Door Systems Institute | ISDSI |
| International Air Transport Association | IATA |
| International Association of Plumbing and Mechanical Officials | IAPMO |
| International Atomic Energy Agency | IAEA |
| International Civil Aviation Organization | ICAO |
| International Commission on Radiation Protection | ICRP |
| International Commission on Radiation Units and Measurements, Inc. | ICRU |
| International Conference of Building Officials | ICBO |
| International Electrotechnical Commission | IEC |
| International Organization for Standardization Case Postale 56 | ISO |
| Metal Building Manufacturers Association | MBMA |
| Metal Lath/Steel Framing Association A Division of NAAMM | MLSFA |
| National Association of Architectural Metal Manufacturers | NAAMM |
| National Association of Plumbing-Heating-Cooling | NAPHCC |
| National Concrete Masonry Association | NCMA |
| National Conference of Standards Laboratories | NCSL |
| National Council of Radiation Protection and Measurements | NCRPM |
| National Electrical Manufacturers Association | NEMA |

| | |
|---|---|
| National Fire Protection Association | NFPA |
| National Ground Water Association | NGWA |
| National Information Standards Organization | NISO |
| National Roofing Contractors Association | NRCA |
| National Safety Council | NSC |
| National Window and Door Association | NWDA |
| Painting and Decorating Contractors of America | PDCA |
| Portland Cement Association | PCA |
| Post-Tensioning Institute | PTI |
| Precast/Prestressed Concrete Institute | PCI |
| Resilient Floor Covering Institute | RFCI |
| Scaffolding, Shoring, and Forming Institute, Inc. | SSFI |
| Screen Manufacturers Association | SMA |
| Sheet Metal & Air Conditioning Contractors National Association | SHACCNA |
| Single Ply Roofing Institute | SPRI |
| Society of Automotive Engineers | SAE |
| Society of Fire Protection Engineers | SFPE |
| Southern Building Code Congress International, Inc. | SBCCI |
| Steel Deck Institute | SDI |
| Steel Door Institute | SDI |
| Steel Joist Institute | SJI |
| Steel Window Institute | SWI |
| The Brick Industry Association | BIA |
| Underwriters Laboratories | UL |
| Water Environment Federation | WEF |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

For DOE reporting purposes, “use” means that a VCS has been cited, referenced, applied, or otherwise incorporated into DOE requirements, operations and activities for the first time, or in continued use. For Fiscal Year 2003, DOE documented the use of 1,187 different VCSs. A VCS that is used by several different organizations or in different versions is reported as a single use by DOE. DOE also internally tracks the use of consortia standards (about 35 – all information technology), but these are not reported.

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

C

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

A

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

A

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

No

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

OMB A-119 continues to be adequate.

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

9. Please provide any examples or case studies of standards successes:

10. Please provide any other comments:

**FISCAL YEAR 2003**
**ANNUAL REPORT TO THE OFFICE OF MANAGEMENT AND BUDGET**
**- STANDARDS USE AND PARTICIPATION -**

**U. S. DEPARTMENT OF ENERGY**

Standards Management: The Department of Energy (DOE) implements the federal guidance and requirements of OMB Circular A-119 (OMB A-119) and the statutory requirements of Public Law (PL) 104-113 (15 USC 272) regarding the use of voluntary consensus standards (VCSs) through specific Departmental directives (policies, orders, requirements, guides, and technical standards) and supporting programs and management systems. The Department's Integrated Safety Management System (ISMS - Internet address is http://tis.eh.doe.gov/ism/) establishes the overall business processes for DOE and its contractors to incorporate management of DOE's environment, health and safety matters for workers, the public and the environment as an integral part of our technical

and business management, using standards as one of its primary tools.

The Department's overall standards activities are managed through the DOE-wide Technical Standards Program (TSP), established under the DOE Standards Executive within the Office of Environment, Safety and Health. (The TSP Internet address is http://tis.eh.doe.gov/techstds/). The TSP provides the means for DOE to fully implement the policy and requirements of PL 104-113 and OMB A-119, and establishes a focus from which to promote the use of VCSs across DOE and to support active participation with Standards Development Organizations (SDOs).

The TSP also manages the development and maintenance of DOE internal standards, where SDO standards are not available to meet unique DOE technical needs and cannot be readily developed by an SDO. The TSP has procedures for converting DOE Technical Standards to VCSs, and has active interfaces and initiatives with ASCE, ANS and ASTM at present.

The TSP also charters "Topical Committees" (TCs) that coordinate standards development activities in specific technical areas across DOE, and with counterparts in other federal agencies, industry, academia, and national and international SDOs. The TCs are comprised of subject matter experts from across the DOE community, and encompass such diverse areas as laboratory accreditation, metrology, fire protection, environmental management systems, meteorology, biota dose assessment, chemical safety, emergency management, and nuclear safety training. DOE TCs may include observers and participants from other federal agencies, industry, academia, and SDOs.

The DOE Standards Executive actively participates with the Interagency Committee on Standards Policy (ICSP), with support from the DOE TSP. The DOE, Nuclear Regulatory Commission (NRC), and National Institute of Standards and Technology (NIST) conduct standards coordination meetings with key SDOs to review common standards needs and activities, identify issues, and coordinate development efforts. The DOE, NRC, and NIST also continue to cooperate in sponsoring U.S. participation with ISO's TC85 Nuclear Energy committees and working groups (presently under ASTM administration).

The DOE Information Technology (IT) Standards Program, in coordination with the DOE TSP, tracks IT standards development, coordinates with subject matter experts, adopts new or retires outdated standards, and maintains a Profile of Adopted Standards - primarily international and national standards (at http://cio.doe.gov/ITReform/ArchitectureStandards/repository_info.htm).

DOE's Office of Energy Efficiency and Renewable Energy (EERE), Codes and Standards Program (Internet address is http://www.eren.doe.gov/buildings/codes_standards/aboffmsn.htm) also conducts a legislatively mandated, multi-year effort to improve the energy efficiency in the Nation's buildings through energy efficiency standards, codes and guidelines for buildings, building equipment, and appliances. The Department is required to promulgate amended energy efficiency standards designed to achieve the maximum improvement in energy

efficiency that the Secretary determines are technically feasible and economically justified. The Department's codes and standards development efforts in these areas are closely coordinated with SDOs and include early involvement of industry and state stakeholders and relevant federal agencies.

Under the President's National Energy Policy, DOE's Hydrogen, Fuel Cells & Infrastructure Technologies Program in EERE integrates activities in hydrogen technologies, including codes and standards (Internet address is: http://www.eere.energy.gov/hydrogenandfuelcells/codes/ ). The Program's objectives include working with national and international code and standards development organizations, code officials, industry experts, and national laboratory scientists to draft new model codes and equipment standards that cover emerging hydrogen technologies for consideration by the various code enforcing jurisdictions, and helping coordinate codes and standards activities to avoid duplication of effort.

Standards Use: DOE "uses" VCSs extensively in managing, operating, and regulating our diverse sites, laboratories, operations, facilities, and activities – over a range that includes nuclear weapons production, energy research, oil storage, hydroelectric power, accelerator operations, nuclear facility decommissioning, and fusion experiments. VCSs are consulted, referenced and applied in mission-related design, procurement, construction, operations, maintenance, emergency operations, and decommissioning efforts; in environment, safety and health management; in DOE research and development activities; and in security and safeguards programs.

For DOE reporting purposes, "use" means that a VCS has been cited, referenced, applied, or otherwise incorporated into DOE requirements, operations and activities for the first time, or in continued use, as noted below. For Fiscal Year 2003, DOE documented the use of 1,187 different VCSs. A VCS that is used by several different organizations or in different versions is reported as a single use by DOE. DOE also internally tracks the use of consortia standards (about 35 – all information technology), but these are not reported.

The VCSs reported "used" by DOE in the annual review are compiled from several sources that cite VCSs as acceptable means to meet requirements, as guidance, or as essential references for DOE and DOE contractors. These sources include: DOE Regulations (as an acceptable means to meet specific DOE requirements or as a reference); DOE Directives - Policy, Orders, Manuals, Guides (as an acceptable means to meet specific DOE requirements or as a reference; DOE Contracts (Management and Operations, Management and Integration - as a committed means to carry out contracted DOE missions and functions); and DOE safety basis documents (stated as a commitment or applied reference in DOE documented safety analyses, including safety analysis reports, standards/requirements identification documents, "work smart" standards sets, process safety management, and hazards analyses).

Other extensive uses of VCSs at DOE that are not documented and reported include: procedures writing; establishing safety criteria (e.g., for worker job task analyses, fire protection, nuclear criticality safety, nuclear facility safety); as supporting references or

cites in internal DOE Technical Standards; and personal or contractor uses and participations that are not on behalf of DOE.

Very few VCSs (none for this reporting period) are mandated through DOE rules, regulations or DOE Directives. However, DOE is an agent in the development and update of certain legislatively mandated building and appliance energy efficiency codes and standards, and in supporting and facilitating the development of hydrogen technology codes and standards. DOE more typically will cite specific VCSs as "acceptable means" for implementing requirements, and allow the use of equivalent alternatives. Very few, if any, VCSs are cited in DOE procurements (outside of Prime Contracts), since most procurements are "off-the-shelf." DOE procurements for "Prime Contracts" (e.g., for operating a National Laboratory) are typically performance-based, and do not specify down to the standards level in their lists of requirements.

Summary: OMB A-119 requires that federal agencies report certain standards use and standards participation information to OMB via NIST. The DOE report is provided as, "FISCAL YEAR 2003 ANNUAL REPORT TO THE OFFICE OF MANAGEMENT AND BUDGET - STANDARDS USE AND PARTICIPATION". The following information summarizes that report:

DOE did not mandate the use of any government-unique standards in lieu of suitable voluntary consensus standards during FY 2003. DOE identified no additional voluntary consensus standards that have been substituted for government-unique standards.

DOE participated with 85 non-government standards bodies. There were 674 agency employees participating in VCS activities (These individuals were involved in 1364 activities due to multiple participations.) DOE used 1,187 VCSs on a continuing basis during FY 2003.

# Department of Health and Human Services

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

4

| Government Standard | Voluntary Standard | Rationale |
|---|---|---|
| FDA Guidelines on Asceptic Processing (1987) | ISO 13408-1 - Aseptic Processing of Health Care Products, Part 1, General Requirements | FDA/CBER is not using the ISO standard because the applicability of these requirements is limited to only portions of aseptically manufactured biologics and does not include filtration, freeze-drying, sterilization in place, cleaning in place, or barrier-isolator technology. There are also significant issues related to aseptically produced bulk drug substance that are not included in the document |
| FR Notice dated June 17, 1994 Tentative Final Monograph for Health Care Antiseptic Drug Products; Proposed Rule (1st Instance) | ASTM Standard E1115 - Test Method for Evaluation of Surgical Hand Scrub Formulations; ASTM Standard E1173-93 - Standard Test Method of an Evaluation of Preoperative, pre-catheterization, or Preinjection Skin Preparations; ASTM Standard E1174-00 - Standard Test method for the Evaluation of the Effectiveness of Health Care Personnel or Consumer Handwash Formulations; | Sensitivity and bias of the ASTM Standard has not been established. |
| FR Notice dated June 17, 1994 Tentative Final Monograph for Health Care Antiseptic Drug Products; | ASTM Standard E1173-93 | Sensitivity and bias of the ASTM Standard has not been established. |

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|---|---|---|
| Proposed Rule (2nd Instance) | | |
| FR Notice dated June 17, 1994 Tentative Final Monograph for Health Care Antiseptic Drug Products; Proposed Rule (3rd Instance) | ASTM Standard E1174-00 | Sensitivity and bias of the ASTM Standard has not been established. |

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

11

| Voluntary Standard | Government Standard |
|---|---|
| AAMI/ANSI SW68:2001 | FDA Guidance |
| ANSI/UL Software in Programmable Components | FDA Guidance |
| GL 22: Studies to Evaluate the Safety of Residues of Veterinary Drugs in Human Food: Reproduction Toxicity Testing | Various |
| GL 23: Studies to Evaluate the Safety of Residues of Veterinary Drugs in Human Food: Genotoxicity Testing | Various |
| GL 31: Studies to Evaluate the Safety of Residues of Veterinary Drugs in Human Food: Repeat-dose (90-day) Toxicity Testing | Various |
| IEEE 1012:1998 | FDA Guidance |
| IEEE 1074:1997 | FDA Guidance |
| IEEE/EIA 12207.0:1996 | FDA Guidance |
| ISO 14644-1 | Federal Standard 209E |
| ISO 14644-2 | Federal Standard 209E |
| ISO/IEC 12207:1995 | FDA Guidance |

3. Please provide the number of voluntary consensus standards used during FY 2003?

663

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

623

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

165

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| Acoustical Society of America | ASA |
| Almond Board of California | ABC |
| American Academy of Pediatrics | AAP |
| American Association for Laboratory Accreditation | A2LA |
| American Association of Blood Banks | AABB |
| American Association of Cereal Chemists | AACC |
| American Association of Food Hygiene Veterinarians | AAFHV |
| American Association of Physicists in Medicine | AAPM |
| American Association of Tissue Banks | AATB |
| American College of Nuclear Physicists | ACNP |
| American College of Radiology | ACR |
| American College of Surgeons | ACOS |
| American Conference of Governmental Industrial Hygienists | ACGIH |
| American Dental Association | ADA |
| American Foundation for the Accreditation of Haematopoietic Cell Therapy | FAHCT |
| American Industrial Hygiene Association | AIHA |
| American Institute of Ultrasound in Medicine | AIUM |
| American National Standards Institute | ANSI |
| American Oil Chemists Society | AOCS |
| American Public Health Association | APHA |
| American Society for Gene Therapy | ASGT |
| American Society for Photobiology | ASP |
| American Society for Reproductive Medicine | ASRM |
| American Society for Testing and Materials | ASTM |
| American Society of Agricultural Engineers | ASAE |
| American Society of Clinical Oncology | ASCO |
| American Society of Heating, Refrigerating, and Air-Conditioning Engineers | ASHRAE |
| American Society of Mass Spectrometry | ASMS |
| American Society of Mechanical Engineers | ASME |
| American Society of Sanitary Engineering | ASSE |
| American Veterinary Medical Association | AVMA |

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|---|---|
| AOAC International | AOACI |
| Association for Assessment and Accreditation of Laboratory Animal Care, International | AAALAC |
| Association for the Advancement of Medical Instrumentation | AAMI |
| Association of Food and Drug Officials | AFDO |
| Baking Industry Sanitary Standards Committee | BISSC |
| British Pharmacopoeia | BP |
| California Strawberry Commission | CSC |
| Cantaloupe Board of California | CBC |
| Chocolate Manufacturers Association | CMA |
| Codex Alimentarius | CODEX |
| Collaborative Committee on the Validation of Alternative Methods | CCVAM |
| College of American Pathologists | CAP |
| Commercial Refrigerator Manufacturers Association | CRMA |
| Conference for Food Protection | CFP |
| Corn Refiners Association | CRA |
| Cosmetic Ingredient Review | CIR |
| Cosmetic Toiletry and Fragrance Association | CTFA |
| Council for International Organizations of Medical Sciences | CIOMS |
| Council on Ionizing Radiation Measurements and Standards | CIRMS |
| Designated Standards Maintenance Organizations | DSMO |
| Deutsches Institut fur Nomung - German Institute for Standardization | DIN |
| Digital Imaging Communications in Medicine | DICOM |
| European Centre for Validation of Alternative Methods | ECVAM |
| European Committee for Standardization | CEN |
| European Pharmacopoeia | EP |
| Eye Bank Association of America | EBAA |
| Food and Agriculture Organization of the United Nations | FAO |
| Fresh Fruit and Vegetable Association | FFVA |
| Fresh Produce Association of the Americas | FPAA |
| Gelatin Manufacturers of America | GMA |
| Global Harmonization Task Force | GHTF |
| Health Level Seven | HL7 |
| Health Physics Society | HPS |
| Health Protection Branch, Health Canada | HPB |
| Honey Board | HB |
| Independent Cosmetic Manufacturers and Distributors | ICMAD |
| Industrial Safety and Equipment Association | ISEA |
| Institute for Reference Materials and Measurements | IRMM |
| Institute of Electrical and Electronic Engineers | IEEE |
| Institute of Food Technologists | IFT |
| Interagency Coordinating Committee on the Validation of Alternative Methods | ICCVAM |
| International Association for Food Protection | IAFP |

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|---|---|
| International Association of Cancer Registrars | IACR |
| International Association of Color Manufacturers | IACM |
| International Association of Environmental Mutagen Societies | IAEMS |
| International Atomic Energy Agency | IAEA |
| International Bottled Water Association | IBWA |
| International Commission on Harmonization of Technical Requirements for Registration of Pharmaceuticals for Veterinary Use | VICH |
| International Commission on Illumination | CIE |
| International Committee for Cosmetic Harmonization and International Cooperation | CHIC |
| International Conference on the Harmonization of Technical Requirements for Registration of Pharmaceuticals for Human Use | ICH |
| International Crystal Foundation | ICF |
| International Dairy Federation | IDF |
| International Dairy Foods Association | IDFA |
| International Electrotechnical Commission | IEC |
| International Federation of Fruit Juice Producers | IFFJP |
| International Fragrance Association | IFRA |
| International Fresh-cut Produce Association | IFPA |
| International Life Sciences Institute | ILSI |
| International Natural Sausage Casing Association | INSCA |
| International Nomenclature Committee | INC |
| International Organization for Standardization | ISO |
| International Organization for Standardization in Microbiology | ISOB |
| International Pharmaceutical Excipients Council | IPEC |
| International Regulatory Alternatives Group | IRAG |
| International Society for Analytical Cytology | ISAC |
| International Society for Blood Transfusion | ISBT |
| International Society for Cardiovascular Surgery | ISCVS |
| International Society for Cell Therapy | ISCT |
| International Society for Measurement and Control | ISA |
| International Sprout Growers Association | ISGA |
| International Testing Services | ITSETL |
| International Union Against Cancer | UICC |
| International Union of Pure and Applied Chemistry | IUPAC |
| International Workshop on Genetic Toxicology | IWGT |
| Interstate Shellfish Sanitation Conference | ISSC |
| Joint FAO/WHO Expert Committee on Food Additives | JECFA |
| Lead Industries Association | LIA |
| Life Sciences Research Organization | LSRO |
| Logical Observation Identifier Name Codes | LOINC |
| National Advisory Committee for Acute Exposure to Hazardous Substances | NACAEHS |
| National Association of Photographic Manufacturers | NAPM |

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|---|---|
| National Automatic Merchandising Association | NAMA |
| National Bison Association | NBA |
| National Cancer Registrar Association | NCRA |
| National Committee for Clinical Laboratory Standards | NCCLS |
| National Committee on vital and Health Statistics | NCVHS |
| National Conference on Interstate Milk Shipments | NCIMS |
| National Cooperation for Laboratory Accreditation | NACLA |
| National Coordinating Council for Cancer Surveillance | NCCCS |
| National Council of Radiation Protection and Measurements | NCRPM |
| National Dialog on Cancer | NDC |
| National Egg Regulators Association | NERO |
| National Electrical Manufacturers Association | NEMA |
| National Environmental Health Association | NEHA |
| National Fire Protection Association | NFPA |
| National Food Processors Association | NFPA |
| National Oilseed Processors Association | NOPA |
| National Sanitary Foundation | NSF |
| National Skill Standards Board | NSSB |
| National Toxicology Program | NTP |
| National Uniform Billing Committee | NUBC |
| National Uniform Claims Committee | NUCC |
| North American Association of Central Cancer Registries | NAACCR |
| North American Deer Association | NADA |
| North American Elk Breeders Association | NAEBA |
| North American Millers Association | NAMA |
| Northwest Horticulture Council | NHC |
| Organization for Economic Cooperation and Development | OECD |
| Pan American Network for Drug Regulatory Harmonization | PANDRH |
| Parenteral Drug Association | PDA |
| Produce Marketing Association | PMA |
| Rehabilitation Engineering and Assistive Technology Society of North America | RESNA |
| Research Institute for Fragrance Materials | RIFM |
| Society for Glassware and Ceramic Decorations | SGCD |
| Society for Toxicology | SOT |
| Society of Automotive Engineers | SAE |
| Society of Cosmetic Chemists | SCC |
| Society of Toxicological Pathologists | STP |
| Strategic National Implementation Process subgroups for HIPPA Standards Implementation | SNIP |
| Tea Association of America | TAA |
| Technical Committee for Juice and Juice Products | TCJJP |
| Tuft's Conference on Modified Fats | CMF |
| U.S. Adopted Names Council | USAN |
| Underwriters Laboratories | UL |
| United Egg Producers | UEP |

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|---|---|
| United Fresh Fruit and Vegetable Association | UFFVA |
| United States Pharmacopoeia | USP |
| US Animal Health Association | USAHA |
| US Egg and Poultry Association | USEPA |
| Western Growers Association | WGA |
| Workgroup for Electronic Data Interchange | WEDI |
| World Health Organization | WHO |
| World Trade Organization | WTO |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

Regarding Question 6.2, FDA's reported numbers reflect the number of citations of voluntary consensus standards in FDA regulations and/or product specifications. FDA currently has no mechanism for reporting the use of these voluntary consensus standards by the regulated industry in product approval applications or for other regulatory purposes. The definition of "uses" should be strengthened to differentiate between standards referenced as part of procurement documents vs. standards referenced in regulatory guidance or regulations.

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

C

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

A

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

A

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

*U.S. Food and Drug Administration* - The policy and recommendations contained in Circular A-119 are consistent with FDA's framework for standards management as announced in the Federal Register on October 11, 1995, and enhanced by the Food and Drug Administration Modernization Act (FDAMA). Resource constraints oblige the agency to focus attention on the highest priority activities and to strive to make its participation in those activities very effective. FDA participates in several hundred standards development activities (the exact number is not known as there is not established procedure to gather this information) within 165 voluntary consensus standards bodies.

The central purpose for FDA involvement in the development and use of standards is to assist the agency in fulfilling its domestic public health and regulatory missions. The agency participates widely in the development of standards, both domestic and international, and adopts or uses standards when this action enhances its ability to protect consumers and increases the effectiveness or efficiency of its regulatory efforts. Further, using standards, especially international ones, is a means to facilitate the harmonization of FDA regulatory requirements with those of foreign governments, and thus to improve domestic and global public health protection. Therefore, FDA encourages participation in the development of standards as a useful adjunct to regulatory controls.

FDA has been involved in standards activities for more than twenty years. In January 1977 the agency promulgated a final regulation now found at 21 CFR 10.95 covering participation by FDA employees in standards development activities outside the agency. This regulation encourages FDA participation in standards activities that are in the public interest, and specifies the circumstances under which FDA employees can participate in various types of standards bodies. The agency built upon that rule with a final policy statement published in the Federal Register on October 11, 1995, entitled International Harmonization; Policy on Standards. It provides the agency's overall policy on development and use of standards for all product areas regulated by the agency.

For FDA, voluntary consensus standards are most relevant for medical devices, where they are used extensively in the agency's regulatory work and where the majority of the agency's standards activities are centered. In the areas of human and veterinary pharmaceuticals, biological products and foods, voluntary consensus are generally not available nor being developed Here FDA works within other national and international organizations such as the World Health Organization (WHO), the Food and Agriculture Organization (FAO), the Organization for Economic Cooperation and Development (OECD), the United States Pharmacopeia, and the International Conference on Harmonization of Technical Requirements for Registration of Pharmaceuticals for Human Use (ICH) to develop standards.

*FDA/Center for Devices and Radiological Health (CDRH)* - The Food and Drug Administration Modernization Act of 1997 (FDAMA) enabled the agency to "recognize" voluntary consensus standards established by international and national standards development organizations that may be used to satisfy identified portions of device pre-market review submissions or other regulatory requirements. CDRH has available a standards relevant document on their web-site. The document, "CDRH Standard Operating Procedures for the Identification and Evaluation of Candidate Consensus Standards for Recognition," establishes internal CDRH procedures for the identification and evaluation of consensus standards for recognition through publication of a notice in the Federal Register. CDRH continues to maintain a database to track the standards activities of its employees and has established and uses searchable ROM databases of voluntary consensus standards to facilitate reference to current voluntary consensus standards by agency reviewers. CDRH continues to participate in Steering Committee and Study Group Activities of the Global Harmonization Task Force (GHTF), an intergovernmental consortium to foster medical device regulatory harmonization. During FY 2001, FDA published draft guidance on a pilot program that will be used to evaluate the feasibility of using the Summary Technical Document (STED) and an Essential Principles Document instead of standard CDRH procedures for certain premarket submissions. Finally, the GHTF has a Memorandum of Understanding with ISO TC 210, the ISO Committee responsible for many regulatory aspects of device standards.

*FDA/Center for Drugs Evaluation and Research (CDER) / Center for Biologics Evaluation and Research (CBER)*- As noted previously, few voluntary consensus standards are applicable to pharmaceutical and biological products. CDER and CBER, therefore, have limited involvement in such activities, but do participate on relevant committees of a number of voluntary consensus standards bodies. FDA supports the concept of working within our agency, with other government agencies, the private sector, and other governments to avoid duplication in standards setting activities. Within FDA, Centers coordinate in the development of Guidances to Industry. We also coordinate our activities with other agencies such as the Environmental Protection Agency, U.S. Fish and Wildlife Service, Consumer Product Safety Commission, Drug Enforcement Agency, and National Institute for Standards and Technology (NIST). CDER is currently exploring opportunities for expanded standards development within ASTM. Finally, a majority of our standards setting activities are focused on interactions with national and international standards setting bodies such as U. S. Pharmacopeia (USP), International Conference on Harmonization (ICH), Organization for Economic Cooperation and Development (OECD), World Health Organization (WHO), and Pan American Health Organization (PAHO). An innovative approach to harmonizing international standards is being undertaken with PAHO. We are providing them with training based on our current standards in hopes that they will elect to adopt our standards.

Both CDER and the CBER participate in the ICH. This ongoing project, begun in 1989, has been undertaken by government agencies responsible for regulation of pharmaceuticals and by industry trade organizations. The European Union (EU), Japan, and the U.S. bring together regulatory authorities and experts from the pharmaceutical

industry in the three regions to discuss scientific and technical aspects of new product registration. The work products, created in working groups of experts from the regulatory agencies and industry, consist of a series of consensus guideline documents to harmonize pharmaceutical testing guidelines.

FDA officials also participate in a consensus standards development activity sponsored by the Council for International Organizations of Medical Sciences that is aimed at standardizing the safety-related terminology used in adverse experience reporting.

FDA/CBER and FDA/CDER actively participate with the WHO in developing international standards for ensuring the quality of pharmaceutical and biological products. ICH, OECD, USP and WHO do not meet the definition of voluntary consensus standard bodies under the Circular A-119. However, substantial agency resources are devoted to the development of standards with these organizations. This work is the core part of FDA's overall standards activities for pharmaceutical and biological products.

*FDA/Center for Food Safety and Applied Nutrition (CFSAN) / Center for Veterinary Medicine (CVM)*- The principal international standards activities in the areas of food and veterinary medicine fall under the activities of the Codex Alimentarius Commission of the FAO and the WHO, as well as the Office of International Epizootics (for veterinary medicine). FDA experts from CFSAN, CVM, and other parts of the agency are actively involved in Codex Alimentarius activities, and in activities of methods validation organizations on which Codex Alimentarius relies, such as ISO, the Association of Official Analytical Chemists (AOAC) International and the International Dairy Federation (IDF). CFSAN has provided the U.S. Delegate or Alternate Delegate to 80% (17 out of 21) of the technical committees and task forces and also provided technical experts to assist on the work of developing more that 90 Codex standards and guidelines. CVM has also provided numerous technical experts to assist on Codex task forces, especially those related to the Codex Committee on Residues of Veterinary Drugs and Foods (CCRVDF). Currently, the Director of CVM serves as the chair of the CCRVDF.

Voluntary consensus standards have limited relevance to food and veterinary medicine products. However, since the standards activities of multilateral organizations such as the WHO, FAO, the World Trade Organization (WTO) and the OECD are important in these areas, CFSAN and CVM are actively engaged in standards and policy development with these organizations. CFSAN is also engaged in standards review in the International Organization for Standardization in Microbiology.

CVM is active in a harmonization initiative similar to the ICH for human pharmaceuticals, that is, developing harmonized requirements for the registration of veterinary pharmaceuticals and biological veterinary medicinal products. It is known as VICH, for Veterinary ICH. Agency employees participate on numerous committees that are drafting VICH guidelines related to veterinary pharmaceuticals.

International/Treaty Standards-Related Activities - FDA takes part in a variety of international standards activities that fall under treaty organizations, and thus are not

reportable under the provisions of Circular A-119. These standards activities are nonetheless important to the agency in fulfilling its public health regulatory mission. Some of these are referred to above, i.e. WHO, FAO, and OECD.

The agency participates in international trade discussions within the WTO, specifically with committees on the Agreement on Technical Barriers to Trade (TBT), and the Agreement on the application of Sanitary and Phytosanitary (SPS) Measures; with the implementation of the counterpart committees of the North American Free Trade Agreement (NAFTA); and with the negotiation of an upcoming trade agreement by 2005 for the Free Trade Area of the Americas where sanitary and phytosanitary measures fall within the scope of the negotiations. FDA is engaged in these negotiations to ensure that the agency's requirements are preserved and its regulatory practices can remain focused on fulfilling the agency's mission to protect the public health while being supportive of emerging, broader U.S. government obligations and policies. FDA has participated in several initiatives that are part of the Asia Pacific Economic Cooperation (APEC) forum.

*Centers for Disease Control* - All areas of CDC work extensively with outside partner organizations for routine work. The Circular wording constrains our reporting to just that activity with Standard Development Organizations as formally defined by the circular. The effect of this constraint is an under-reporting of our activity with outside partners. Complete reporting of our activities with outside partners, however, would be burdensome and impossible to obtain as essentially all professional staff interacts with a diverse group of partners on a daily basis. If the main intent of the circular is to report the use of outside SDO developed standards for commerce, the data in this report reflects that information. If the intent of the Circular is to reflect government interactions with all non-government organizations involved in policy decisions our data reflects severe under-reporting.

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

*U.S. Food and Drug Administration* - FDA inspects manufacturers of regulated products (pharmaceuticals, veterinary drugs, medical devices, biologicals) for compliance with current Good Manufacturing Practice (cGMP)and/or Quality System (QSR)Regulations requirements. FDA inspects laboratories that provide pivotal animal studies for drug approvals for compliance with Good Laboratory Practice (GLP). FDA participates on the ANSI Accreditation Committee, the ANSI International Conformity Assessment Committee, ANSI Board Committee on Conformity Assessment, and ASTM Committee E-36 on Conformity Assessment. Within FDA, the Center for Devices and Radiological Health allows a medical device manufacturer to submit a Declaration of Conformity to a "recognized standard" as described in ISO/IEC Guide 22 in its standards recognition program and has developed an MRA with the European Union on mutual recognition of each other's conformity assessment procedures related to manufacture and marketing of medical devices. The FDA Office of Regulatory Affairs (FDA/ORA) actively participates with the National Cooperation for Laboratory Accreditation (NACLA), serving as a

member of the NACLA Executive Board of Directors and participating in the NACLA Recognition Committee for Accrediting Bodies who apply for mutual recognition. Other FDA officials participate with NACLA in the evaluation of accrediting bodies under ISO/IEC 58 and ISO/IEC 17025 and sit on NACLA technical committees.

9. Please provide any examples or case studies of standards successes:

*Centers for Disease Control* - The Agency is very involved in the voluntary standards process and has been for a number of years. See http://www.cdc.gov/phin/ for an example of a current system using voluntary consensus standards.

*Centers for Medicare & Medicaid Services* - CMS is participating with the National Quality Forum (NQF) in the endorsement of standards for performance measures of quality among various providers. This effort brings all stakeholders together to make a determination founded in a membership-driven NTTAA-compliant consensus process. The endorsements that occurred in CY 2003 included Nursing Home quality Measures and Hospital Quality Measures. Regarding Nursing Home measures, now that NQF has established a set of standard measures, in January 2004, we will be conforming the measures we portray on our website to those. Regarding Hospital quality measures, CMS selected 10 measures from the NQF list to use in a National Hospital Voluntary Reporting Imitative. The CMS Administrator has a permanent seat on the Board of Directors of the NQF and participates in the endorsement of the consensus driven standards (measures) through a voting process. CMS also has membership and voting seat on the Purchaser Council.

*Food and Drug Administration FDA/CBER* - The overwhelming majority of CBER's standards setting activities with outside organizations, are with groups which do not meet all of the requirements of the OMB Circular No. A-119 definition of a voluntary consensus standards body. CBER interactions with these organizations have resulted in development of several standards that affect a variety of products CBER regulates. These groups include, International Conference on Harmonization (ICH), Global Harmonization Task Force (GHTF), Pan American Health Organization (PAHO) and the World Health Organization (WHO), United States Pharmacopoeia (USP), International Society For Blood Transfusion (ISTB), and United States Adopted Names Council (USAN). CBER also collaborates with the National Institute for Biological Sciences and Controls (NIBSC), a United Kingdom Institute, to develop standards and reference materials for biological products. These materials are often presented to WHO for their consideration as international standards. In addition CBER has recently initiated activities with a variety of organizations that may result in the development of standards mostly for cellular therapies and tissue products. These organizations include, American Society for Reproductive Medicine (ASRM), American Association of Tissue Banks (AATB) Association Society for Cell and Gene Therapy and Eye Bank Association of America (EBAA). CBER is a participant in a collaborative effort with other international governmental organizations to develop standards to be used in evaluating the potency for select blood derived products including vonWillebrand factor. CBER also organized an Adenovirus Reference Materials Working Group that developed an adenoviral virus

reference material that was released in August 2002. This material was developed in a unique collaborative effort with donations from multiple organizations and institutions. The reference material is used to define the particle unit and infectious units for adenovirus vectors used in gene therapy. A similar effort is also underway for an adenovirus-associated vector in this reporting year.

*FDA/CDER* - The data provided earlier in this report indicate only limited involvement with voluntary consensus standard setting organizations. However, they are not reflective of CDER's true involvement with standard setting organizations. The majority of CDER's standards setting activities are with groups which do not meet the OMB A119 definition of a voluntary consensus standards body: United States Pharmacopeia (USP), International Conference on Harmonization (ICH), Organization for Economic Cooperation and Development (OECD) and the World Health Organization (WHO). The primary standards setting organization for CDER is the United States Pharmacopeia (USP). The Food, Drug, and Cosmetic Act recognize USP and mandates CDER's involvement with the USP. CDER is also active with the ICH, the OECD, and the WHO.

*FDA/CVM* - CVM staff members participate in the activities of the Codex Alimentarius Commission of the FAO and the WHO, as well as the Office of International Epizootics (for veterinary medicine). Experts from CVM and other parts of the agency are actively involved in activities, and in activities of methods validation organizations on which Codex Alimentarius relies, such as ISO and AOAC International. Voluntary consensus standards have limited relevance to veterinary medicine products. However, since the standards activities of multilateral organizations such as the WHO, FAO, and the OECD are important in these areas; CVM is engaged in standards and policy development with these organizations. CVM publishes significant approvals in the Federal Register and includes information on chemical tolerance levels. This can be compared to the tolerance levels established by CODEX. CVM requests that sponsors submitting antimicrobial susceptibility data use the methods described in the NCCLS for generating their data.

CVM is active in the VICH, a harmonization initiative similar to the ICH initiative for human pharmaceuticals. CVM publishes as FDA guidance all VICH guidelines. Through VICH, CVM has finalized 30 harmonized guidelines and is developing several more for the registration of veterinary pharmaceuticals.

*FDA/ORA* - The Office of Regulatory Affairs (ORA) actively participates with the National Cooperation for Laboratory Accreditation (NACLA). An ORA official is a member of the NACLA Executive Board of Directors and has the role of participating in the NACLA Recognition Committee for Accrediting Bodies who apply for mutual recognition. Other FDA officials participate with NACLA in the evaluation of accrediting bodies under ISO/IEC 58 and ISO/IEC 17025 and sit on NACLA technical committees. An ORA official is the FDA Liaison to the Board of Directors of the American Association for Laboratory Accreditation (A2LA).

ORA officials are also involved with Codex Alimentarius activities, especially in the area of pesticide residues, which relies on methods development by ISO and AOAC. Other

activities include participation and the coordination of Federal-State conferences to develop uniformity in the reporting of food testing results. The ISO/IEC 17025 standard is the foundation in this coordination effort.

*Agency for Healthcare Research and Quality* - AHRQ funds and participates with the National Quality Forum (NQF) in the endorsement of standards for performance measures of quality among various providers. This effort brings all stakeholders together to make a determination founded in a membership-driven NTTAA-compliant consensus process. In 2003, AHRQ incorporated NQF standards in its National Quality Report that was mandated by Congress and is in clearance within HHS. The AHRQ Director has a permanent seat on the Board of Directors of NQF and participates in the endorsement of the consensus driven standards (measures) through a voting process. AHRQ provides support to NQF.

AHRQ is a member and supports the meetings of the ANSI Health Informatics Standards Board, a board that coordinates the U.S. standards developing organizations for health information exchange. Other federal agencies, professional health organizations, and vendors are members. Duplication and overlap of health data standards domains and other issues are voluntarily resolved through ANSI HISB.

AHRQ is a member and supports the meetings of the U.S. Technical Advisory Group to ISO Technical Committee 215, Health Informatics. The U.S. TAG formulates and reaches consensus on the U.S. position on health data issues taken at ISO TC 215 meetings.

AHRQ supported the Institute of Medicine's letter report recommending eight functions be included in the definition of an electronic health record. These functions were used by Health Level 7 to produce a balloted standard on the functional definition of an EHR in September 2003. The ballot failed to reach consensus. Currently the negative ballots are being address in anticipation of another ballot on the standard.

AHRQ participates as a liaison to the National Committee on Vital and Health Statistics (NCVHS), an advisory committee that advises the Secretary of HHS on health information policy. NCVHS recommended adoption of four ANSI standards to the Secretary for use in federal health program information exchange. On February 21, 2003, the Secretary adopted these messaging standards. In FY 2004, NCVHS will recommend a core set of terminology standards to the Secretary for adoption.

AHRQ participates in one of the administration's 24 eGovernent initiatives-the Consolidated Health Informatics (CHI) initiative. In 2003, CHI recommended four messaging standards and one terminology standard to the Secretary of HHS for adoption. He adopted all five. CHI is working selecting voluntary consensus standards for a total of 24 domain areas.

AHRQ supported the founding of the Health Level 7 Special Interest Group on Patient

Safety to begin the process of developing standards for reporting patient safety events across the nation in a uniform format.
10. Please provide any other comments:

*Food and Drug Administration* - As noted in the response to Question 6, this survey is not very instructive regarding the way that regulatory agencies use standards. HHS, in addition to using standards for procurement purposes, uses standards to describe characteristics of products and manufacturing processes which help insure the safety and efficacy of products manufactured to those standards. The survey does not reflect this latter use accurately.

*Centers for Disease Control* - All areas of CDC work extensively with outside partner organizations for routine work. The Circular wording constrains our reporting to just that activity with Standard Development Organizations as formally defined by the circular. The effect of this constraint is an under-reporting of our activity with outside partners. Complete reporting of our activities with outside partners, however, would be burdensome and impossible to obtain as essentially all professional staff interacts with a diverse group of partners on a daily basis. If the main intent of the circular is to report the use of outside SDO developed standards for commerce, the data in this report reflects that information. If the intent of the Circular is to reflect government interactions with all non-government organizations involved in policy decisions our data reflects severe under-reporting.

*Agency for Healthcare Research and Quality* - AHRQ has supported voluntary consensus standards development and processes for many years because uniform information exchange can lead to better research data having more powerful findings and because informatics tools can better access the knowledge to improve patient safety, quality of care, the cost of care, and access to care.

## Department of Homeland Security

DHS did not submit a report for 2003.

# Department of Housing and Urban Development

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

2

| Government Standard | Voluntary Standard | Rationale |
|---|---|---|
| 24 CFR 200.935 - Administrator qualifications and procedures for HUD building products and certification programs | ANSI A119.1 N - Recreation Vehicles | HUD Building-Product Standards & Certification Programs. HUD was required by legislation to "establish Federal construction and safety standards for manufactured homes and to authorize manufactured home safety research and development". Recently, HUD retained a private consensus body (NFPA) to update and modernize the Manufactured Home Standards. At the conclusion of the development process, NFPA will submit the revised standard to HUD for regulatory adoption. |
| 24 CFR 3280 - Manufactured Home Construction and Safety Standards | ANSI A119.1 - Recreation Vehicles and NFPA 501C - Standard on Recreational Vehicles | HUD-Unique Manufactured Home Construction & Safety Standards. HUD was required by legislation to "establish Federal construction and safety standards for manufactured homes and to authorize manufactured home safety research and development". Recently, HUD retained a private consensus body (NFPA) to update and modernize the Manufactured Home |

Standards. At the conclusion of the development process, NFPA will submit the revised standard to HUD for regulatory adoption.

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

1

| Voluntary Standard | Government Standard |
|---|---|
| NFPA 501 | 24 CFR 3280 |

3. Please provide the number of voluntary consensus standards used during FY 2003?

300

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

10

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

5

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| American Society for Testing and Materials | ASTM |
| Federal Geographic Data Committee | FGDC |
| International Committee for Information Technology Standards | INCITS |
| International Organization for Standardization | ISO |
| National Fire Protection Association | NFPA |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

No response was given for 6.1 to 6.5 so the not applicable choices were used.

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

D

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

D

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

D

6-4 Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

No

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

No

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

This policy continues to be effective in replacing Federal Standards with public-domain standards. This has resulted in more timely, up-to-date, and technically accurate standards. The Department of Housing and Urban Development (HUD) suggests Circular A-119 use stronger language to encourage agencies to be more active in determining which standards are applicable to the agency's activities and when standards are identified, motivate the agency to be more assertive in enforcing their use.

8 Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

All of HUD's 25 conformity assessment (CA) programs, under the HUD Building-Products Standards & Certification Programs, are in compliance with the ISO guidelines & procedures. These are the same standards used by ANSI and other nationally recognized third-party certification agencies.

9. Please provide any examples or case studies of standards successes:

I. Office of Policy Development and Research

Department/Agency

U.S. Department of Housing and Urban Development (HUD)
Office of Policy Development & Research
451 Seventh Street, SW
Washington, DC 20410
Phone: (202) 755-4370
FAX: (202) 708-5873
URL address: http://www.hud.gov/progdesc/pdrindx.cfm

The HUD Office of Policy Development & Research (PD&R) has recently completed an assessment of HUD's own Minimum Property and Technical Suitability of Products program. This major study recommends that the Department extend its reliance on voluntary standard in two ways. First, the study recommends that HUD totally abandon the MPS for single-family housing in all aspects totally relying on the model codes, especially the ICC & IRC codes and remove all remaining references to the MPS in HUD regulations. This would clarify the reality of HUD not using its own standards in any way, shape or form. Second the study recommends that HUD abandon its own "Technical Suitability of Products" program relying instead on the National Evaluation Service to review al innovative or other products that do not meet the prescriptive standards of the model codes. This major study is now under review by the assistant Secretary for Housing. If adopted this major reform will further strengthen our reliance on the voluntary and private consensus process in lieu of HUD developed standards and criteria

Second, HUD's Partnership for Advancing Technology in Housing (PATH) is continuing to encourage private industry to develop standard XML definitions for use in Internet based home construction commercial transactions. These will be used amongst specific home construction entities. One of the group's objectives is to improve the speed of construction in order to make houses more affordable. Sharing the same technical language and being able to speak quickly and accurately is a big challenge. Applying Information Technology (IT) seemed to be one solution. However, the group didn't know how to implement it.

The first industry based group from the timber manufacturing industry approached PATH to assist them in convening hearings and task groups to develop such a common language (in this case, through XML tag sets) so that it would become an industry de facto "standard". PATH is now working with the window industry to develop similar XML tags for window industry tags will be used internally by the window industry and down through the distribution chain by wholesalers and homebuilders for the just in time ordering of products through web-based tools

These efforts have stimulated the first industry-based attempts to posit these standard definitions (most attempts have been top-down and unsuccessful). Also, because government served only in a facilitation capacity: industry did all the work! We plan to continue this work under PATH with different groups in the construction industry; we currently have three lined up.

II. MANUFACTURED HOUSING

Department/Agency

U.S. Department of Housing and Urban Development (HUD)
Federal Housing Administration (FHA)
Office of Housing
Office of Consumer and Regulatory Affairs
Manufactured Housing and Standards Division
HSCM Room 9152
451 Seventh Street, SW
Washington, DC 20410-8000
Hotline for complaints: 1-800-927-2891
Phone: (202) 708-6409
FAX: (202) 708-4213
e-mail: mhs@hud.gov
URL address: http://www.hud.gov/fha/sfh/mhssht3.html

Initiated 1976

Compliance Mandatory

Authority National Manufactured Housing Construction and Safety Standards Act, P.L. 93-382, 42 U.S.C. 5407. 24 CFR Part 3280.

Aim:
To reduce the number of personal injuries and deaths, cost of insurance, and property damage resulting from manufactured home accidents and to improve the quality and durability of manufactured homes.

Benefits:
Uniform nationwide certification program has accomplished the stated purposes of the Act and improved interstate commerce in manufactured housing.

Methodology:
As required by the Manufactured Housing Improvement Act of 2000, HUD is now relying on a private consensus committee administered - by the National Fire Protection Association (NFPA) to develop new regulations for revising HUD's Manufactured Housing Standards. As required by law, this change moves towards greater reliance on a formal consensus committee. In the past, HUD consulted with an Advisory Committee, which had a very limited role. By law this new committee must follow ANSI standards and also apply to ANSI for accreditation. In addition, this consensus committee is developing, for the first time, model installation standards which must be completed this year. The consensus committee held its second full meeting in December 2002 and established its structure and committees. The installation subcommittee is making good

progress using NFPA 225 Model Installation standards as its initial starting document.

Term:
Indefinite term

Reciprocity:
Other federal agencies and State agencies

Standards, Codes: Agency references standards prepared by others and or Regulations incorporates requirements in the Federal Manufactured Home Construction Safety Standards (24 CFR Part 3280). Enforcement is in accordance with Procedural and Enforcement Regulations (24 CFR Part 3282).

Keywords:
Design approval; housing requirements; inspection; manufactured housing; product safety

10. Please provide any other comments:

The Department of Housing and Urban Development (HUD) reports the continued use of two government-unique standards in lieu of voluntary consensus standards. HUD reports that it uses 24 CFR 200.935 in lieu of ANSI A 119.1 for its Building Product Standards and Certification Program. HUD also uses 24 CFR 3280 in lieu of ANSI 119.1 and NFPA 501C for its Manufactured Home and Construction Safety Standards. A recent study proposing eliminating the Building Products Standards and Certification Program (and relying on other existing standards) is under consideration. HUD is working with NFPA to revise and update the Manufactured Home and Construction Safety Standards through a consensus process.

HUD's ten participants in Standards Developing Organizations (SDO's) are from HUD's:
Office of Policy, Research, and Development (R);
Office of Healthy Homes & Lead-Hazard Control (L);
Office of Housing-Federal Housing Commissioner (H); and,
Office of the Chief Information Officer (Q)

Following are some acronyms used in this and similar reports:

STANDARDS-RELATED ACRONYMS

ACRONYM: DESCRIPTION

A-119: OMB's Circular that posits presidential-mandated standards activities for U.S. Government Agencies
ACM: Association of Computing Machinery
ASC: Accredited Standards Committee
ANSI: American National Standards Institute

ASME: American Society of Mechanical Engineers
ASQC: American Society for Quality Control
ASTM: American Society for Testing & Materials
ATIS: Alliance for Telecommunications Industry Solutions
CA: Conformity Assessment
CCITT: Comite Consultatif International Telegraphique et Telephonique (now ITU- T)
CD: Committee Draft
CE: European Community (mark), an icon required for products sold in the European Union (Dubbed an 800-lb gorilla)
CE: Consumer Electronics
CEN: European Committee for Standardization (Comite European de Normalisation)
CENELEC: Comite European de Normalisation ELECtrotechnique [European Committee for Electrotechnical Standardization]
CS: Central Secretariat
DIN: Deutsches Institut fur Normung (German Standardization Institute)
DIS: Draft International Standard Dresden Agreement (See the definition in the ANSI NSS brochure
EC: European Commission
ECI: Environmental Condition Indicator
EFTA: European Free Trade Association
EIA: Electronics Industries Association
ENV: European Pre-standard
EPE: Environmental Performance Evaluation
ETSI: European Telecommunications Standards Institute
EU: European Union
FDIS: Final Draft International Standard
FTCA: Federal Trade & Communications Act
GATT: General Agreement on Tariffs & Trade
GMC: ANSI's Government Member Council
ICSP: InterAgency Committee for Standards Policy
IEC: International Electro-technical Commission
IEEE: Institute of Electronic & Electrical Engineers
INCITS: International Committee on Information Technology Standards
IPC: Institute for Interconnecting & Packaging Electronic Circuits
IPR: International Property Rights
IS: International Standard
ISO: International Organization for Standardization (Fr)
ITI: Information Technology Industry (Council)
ITU-T: International Telecommunication Union- (Standardization Division), formerly CCITT
JTC/: Joint (ISO/IEC) Technical Committee (for Information Technology) 1
LCA: Lifecycle Assessment
MPI: Management Performance Indicator
NC: National Committee
NCITS (EN cites): National Committee for Information Technology Standards [obsolete; see INCITS]

NEMA: National Electrical Manufacturers Association
NIST: National Institute of Standards & Technology
NP: New Work-Item Proposal
NSS: National Standards Strategy (ANSI)
NSSN: National Standards System Network (An email-based source for Global Standardization: www.ansi.org)
NTTAA: National Technology Transfer & Advancement Act (PL 104-113)
OPI: Operational Performance Indicator
OSI: Open Systems Interconnection
PCMCIA: Personal Computer Memory Card International Association
PrEN: Preliminary European Standard
PL: Public Law
RI: Regulatory Interface
SAE: Society of Automotive Engineers
SAGE (ISO): Strategic Advisory Group on the Environment
SC: Subcommittee
SDO: Standards Developing Organization
SES: Standards Engineering Society
SI: International System of Units
SME: Subject Matter Expert
SSM: Strategic Standardization Management
TA: Technical Advisor
TAG: Technical Advisory Group
TC: Technical Committee
TMB: ISO Technical Management Board
TSP: Proposal for a New Field of ISO Technical Activity (Fr)
USITACS: United States International Telecommunications Advisory Committee for Standardization (DOS)
USNC: United States National Committee
VA: Vienna Agreement (See the definition in NSS)
WD: Working Draft
WG: Working Group
WTO: World Trade Organization

Questions re HUD's standards may be directed to Dana Bres (PH: 202-708-4370 ext 5919 or email: Dana_B._Bres@hud.gov.

# Department of the Interior

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

0

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

242

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

645

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

25

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| American Concrete Institute | ACI |
| American Institute of Steel Construction | AISC |
| American National Standards Institute | ANSI |
| American Petroleum Institute | API |
| American Society for Testing and Materials | ASTM |
| American Society of Civil Engineers | ASCE |
| American Society of Mechanical Engineers | ASME |
| American Society of Photogrammetry and Remote Sensing | ASPRS |
| American Water Works Association | AWWA |
| American Welding Society | AWS |
| Computer Security Institute | CSI |
| Computer Security Response Network | CSRN |
| Financial Accounting Standards Advisory Board | FASAB |
| Financial Accounting Standards Board | FASB |
| Generally Accepted Accounting Standards | GAAP |
| Ground Water Protection Council | GWPC |
| Institute for Electrical and Electronic Engineers | IEEE |
| International Committee for Information Technology Standards | INCITS |

| | |
|---|---|
| International Standards Organization | ISO |
| National Association of Corrosion Engineers | NACE |
| National Institute of Standards and Technology | NIST |
| North American Weeds Management Association | NAWMA |
| Petrotechnical Open Standards Consortium, Inc. | POSC |
| SysAdmin, Audit, Network, Security Institute | SANS |
| World Wide Web Consortium | W3C |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

C

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

C

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

C

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

The following comments are provided from various DOI organizations:

*Minerals Management Service (MMS)*: As a result of A-119, MMS has increased its participation in voluntary standards groups, both domestic and international.

*Fish and Wildlife Service (FWS):* The guidance in the A-119 appears to be sufficient in the terms of outlining the basic functions and responsibilities of Federal agency standards activities. However, some simplification and clarification of the reporting process appears necessary. Further, many of the definitions provided in the circular reference each other without fully defining the word or its implication in operational activities.

*Bureau of Reclamation (BOR):* Circular A-119 guidance is adequate for our needs.

*US Geological Survey (USGS):* Since its issuance, A-119 has worked in a straightforward manner to encourage the use of voluntary consensus standards. A-119 allows exemptions where existing voluntary consensus standards are inconsistent with law or otherwise impractical and if each exemption is reported to OMB. The nature of the scientific research the USGS performs makes the use of national voluntary consensus standards a required tool. The USGS has not requested any exemptions, nor is the recommendations for changes to the Circular.

*National Parks Service (NPS):* OMB Circular A-119 should be broken down into circulars that are more focused in scope. This will improve the changes that the right information will be reported and minimize the burden to agencies - if the goal is to improve the effectiveness of standards reporting. Furthermore, rather than reporting use and non-use of standards, standards can be more effectively monitored and controlled through other processes. For example, all proposed investments in information and technology must demonstrate conformance with the enterprise and federal architecture in the Exhibit 300 to be successful in the funding process. This is a very effective way to control use of standards in contract to the report required by A-119.

*Bureau of Land Management (BLM):* The BLM has attempted to enlist support for the development of its data standards both from other agencies and from the public. It is still unclear if there are advantages to developing voluntary consensus standards at the expense of government standards that can be used across the Departments. We recognize that Office of Management and Budget's Circular A-119 does not endorse the use of voluntary standards at the expense of governmental standards (except, of course, where the governmental standard does not exist) but the recognition of interagency efforts in promoting standards seems to be lost in this data call. The reporting should address attempts by agencies to get agreements on adopting standard and not concentrate on the process to determine whether or not a standard is through voluntary consensus or some other means.

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

Active participation in the FGDC Coordination Work Group and the Geospatial One-Stop (GOS) initiative. A subgroup of the FGDC's Standards Work Group has been formed to develop a process for approving/endorsing voluntary consensus standards

consistent with OMB Circular A-119 directive. One major GOS objective is to develop geographic information standards and services for multiple applications through identification of common data requirements and use of structures from voluntary consensus standards.

9. Please provide any examples or case studies of standards successes:

The Bureau of Land Management (BLM) is participating in a number of efforts to standardize its data. Major efforts to include other federal and state partners are included below:

The FGDC: The BLM is a member with representation on the FGDC steering committee, its Standards Working Group, and subcommittees developing standards for geospatial data. The BLM maintains a node on the World Wide Web to document the FGDC metadata used to support its Land Use Plan and other land management activities.

The FGDC establishes standards for Federal agencies as mandated by the Congress and the President. At some point in the standards process, the FGDC standards apply only to federal agencies. Efforts are underway (and continuing), to get FGDC standards adopted as ANSI standards or International Standards Organization standards.

Inter-Organization Resource Information Coordinating Council (IRICC): The Oregon State Office of the BLM participates in voluntary standards that are developed by IRICC, an outgrowth of the North West Forest Plan, which include the BLM, the USFS, and state natural resource partners, particularly in the area of hydrology, fisheries, and related categories.

State Historic Preservation Offices (SHPO): The BLM has been cooperating with SHPO and other agencies to standardize it cultural resource data with the States.

Trails Data: The BLM also participates as a member of the Interagency Trails Data Standards Team developing data standards for trails of all kinds for National Park Service (NPS), BLM and US Forest Service. These will affect all BLM lands, all national forests and all national park units and special areas. The team is currently refining some attributes common to all and some attributes that relate specifically to national historic trails with a goal of producing a draft product for review within the next couple of months. We are beginning to devise a strategy for review both internally and eternally, as data for trails is gathered by staff and by volunteers. The team will be meeting to see how this might mesh with electronic government on February 27, 2004, in Washington, DC.

GEOMAC: The data elements for fire perimeter information began to be developed in the summer of 2000 and have gained widespread acceptance in the wildland fire community. The data was developed through the cooperation of DOI agencies and is available on the national websites http://geomac.usgs.gov.

Hydrologic Unit Boundaries: The BLM, the Natural Resources Conservation Service, and

the Bureau of Reclamation have used the Federal Standards for delineation of Hydrologic Unit Boundaries to perform detailed Geographic Information Systems mapping. The standard has been submitted to the FGDC and is currently listed in the proposal stage.

The BLM also participates in the National Digital Elevation Program (NDEP) and the National Digital Orthophoto Program, both of which involve sharing information among federal agencies. The NDEP was established to promote the exchange of accurate digital land elevation data among government, private, and nonprofit sectors and the academic community and to establish standards and guidance that will benefit all users. The NDEP is composed of agencies from DOI, Commerce, and Agricultures, as well as the National Imagery and Mapping Agency, National Aeronautics and Space Administration, US Army Corp of Engineers, and the Federal Emergency Management Agency, and representation from state governments through the National States Geographic Information Council.

The National Digital Orthophoto Program (NDOP) was established to promote the cooperative production of digital orthophoto quads (DOQ) among participating Federal agencies. Over the years the focus has broadened to include orthophotography acquired by State and local governments. Members include BLM participants as well as the following agencies; (USDA) Farm Service Agency, Natural Resources Conservation Service, USFS, US Geological Survey, BLM Federal Emergency Management Agency, Environmental Protection Agency, Bureau of Census and the National States Geographic Information Council.

10. Please provide any other comments:

## Department of Justice

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

0

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

1

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

5

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

1

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| Global Justice Information Sharing Initiative | GLOBAL |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

B

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

A

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

A

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

In some cases the use of standards overlaps with Information Technology Enterprise Architecture and the standards derived from that process. External entities needing to interoperate with government agencies must conform to interface criteria specified as government standards. In the case of the Department of Justice we collaborate with local and state law enforcement agencies to develop standards for communications but it is unclear as to how this aspect of Enterprise Architecture relates to standards use in general.

8 Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

None

9. Please provide any examples or case studies of standards successes:

The Department is participating in activities seeking to standardize the format and content of law enforcement and public safety data in order to facilitate information sharing among state, local, and federal organizations. Currently, a Global Justice XML Data Model specifies a collaboratively developed set of standard data elements data elements that can be used to facilitate interoperability among compliant systems.

10. Please provide any other comments:

None

# Department of Labor

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

2

| Government Standard | Voluntary Standard | Rationale |
|---|---|---|
| Exit Routes, Emergency Action Plans, and Fire Prevention Plans, 29 CFR 1910, Subpart E | Life Safety Code, NFPA 101-2000 | The OSHA standard addresses only workplace conditions whereas the NFPA Life Safety Code goes beyond workplaces. However, in the final rule OSHA stated that it had evaluated the NFPA Standard 101, Life Safety Code, (NFPA 101-2000) and concluded that it provided comparable safety to the Exit Route Standards. Therefore, the Agency stated that any employer who complied with the NFPA 101-2000 instead of the OSHA Standard for Exit Routes would be in compliance. |
| Sanitary Toilets in Coal Mines, 30 CFR 71, Subpart E | Non-Sewered Waste Disposal Systems--Minimum Requirements, ANSI Z4.3-1987 | The ANSI standard was not incorporated by reference because certain design criteria allowed in the ANSI standard, if implemented in an underground coal mine, could present health or safety hazards. For instance, combustion or incinerating toilets could introduce an ignition source which would create a fire hazard. For certain other design criteria found in the ANSI standard, sewage could seep into the groundwater, or overflow |

caused by rain or run-off could contaminate portions of the mine.

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

117

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

61

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

16

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| American Conference of Governmental Industrial Hygienists | ACGIH |
| American Industrial Hygiene Association | AIHA |
| American Institute of Mining and Metallurgic Engineers | AIMME |
| American National Standards Institute | ANSI |
| American Society for Testing and Materials | ASTM |
| American Society of Mechanical Engineers | ASME |
| American Welding Society | AWS |
| Commercial Motor Vehicle Safety Alliance | CMVSA |
| Federal Laboratory Consortium | FLC |
| International Electrotechnical Commission | IEC |
| International Organization for Standardization | ISO |
| International Society for Measurement and Control | ISA |
| International Society of Explosive Engineers | ISEE |
| National Fire Protection Association | NFPA |
| Society of Automotive Engineers | SAE |
| Underwriters Laboratories | UL |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

A

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

A

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

A

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

No

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

9. Please provide any examples or case studies of standards successes:

OSHA is working with a number of Standards Developing Organizations (SDOs) as it attempts to update over 200 national consensus standards that were incorporated by reference in the early years of OSHA's existence. Many of the incorporated-by-reference standards, which are cited in over 500 OSHA provisions, are over 30 years old. Several SDOs have provided technical assistance to the Agency as it develops side-by-side comparative analysis to ascertain the differences between the incorporated standard and the most current version that will be necessary to meet legal and statutory obligations before the Agency can complete the updating process.

10. Please provide any other comments:

The reporting tool makes it much easier to complete the report--excellent idea and excellent tool.

## Department of State

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

0

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

0

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

0

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

0

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

No response was given for 6.1 to 6.5 so the not applicable choices were used.

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

D

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

D

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

D
6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

No

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

No

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

No response

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

No response

9. Please provide any examples or case studies of standards successes:

No response

10. Please provide any other comments:

The Department of State has a major policy role in telecommunications standards as obligated by international treaty, and coordination roles in other areas. The Bureau of Economic and Business Affairs (EB) represents the Department of State on the Interagency Committee on Standards Policy (ICSP), the Government Member Council, and the Information Infrastructure Standardization Panel (IISP) and its steering committee at the American National Standards Institute (ANSI). The Department is not involved in the actual development of technical standards.

The Department represents the United States of America administration under the treaty obligations found in the Convention of the International Telecommunication Union (ITU), Minneapolis, 1998, and the Inter-American Telecommunication Commission (CITEL) of the Organization of American States (OAS). The Department of State, through the EB Communications and Information Policy Deputate (CIP), provides the forum for development of positions and contributions for presentation at ITU and CITEL meetings where international telecommunication recommendations (voluntary standards) and telecommunication standardization policies are written. The Department authorizes and/or hosts public meetings under the Federal Advisory Committee Act, where advice

on telecommunication standardization and policy issues is offered by the private sector telecommunications industry. The Department also bases its decisions on advice from other public sector agencies (DoD, the National Institute of Standards and Technology [NIST], the National Telecommunications and Information Administration [NTIA], the National Aeronautics and Space Administration [NASA], and the Federal Communications Commission [FCC]). The Department coordinates, leads, and/or accredits United States delegations to ITU and CITEL technical and policy meetings.

More than 100 U.S. corporations are participating members of the ITU; more than 30 are associate members of CITEL's permanent Consultative Committee, under the sponsorship of the State Department. Those companies and interested government agencies participate and play major roles in the ITU and CITEL Study Groups and Working Parties that actually write the standards. Within that process, a great deal of interaction takes place with other standards setting organizations, such as the International Organization for Standardization (ISO), ANSI, ANSI-accredited Committee T1, and the Telecommunications Industry Association.

In addition to accrediting and supporting delegations to the ITU and CITEL, the Department's International Organization Affairs Bureau (IO) accredits and funds participation by relevant specialized agencies (the Departments of Agriculture, Commerce, Transportation, and NIST) and private sector groups in the deliberations of the Economic Commission for Europe (ECE) Working Party on Standardization, especially where they have a direct bearing on U.S. commercial interests. While the standards developed in the ECE are not officially adopted for use in the United States they serve as guides for adjusting product design and are widely taken into account in manufacturing plans.

# Department of Transportation

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

1

| Government Standard | Voluntary Standard | Rationale |
|---|---|---|
| Brake Performance, 49 CFR 393.52 - FMCSA's Performance-Based Brake Testers (PBBTs) Requirement | SAE J667 - Brake Test Code Inertia Dynamometer (cancelled February 2002) and SAE J1854 - Brake Force Distribution Performance Guide - Trucks and Buses | FMCSA used government-unique standards in lieu of voluntary consensus standards when it implemented its final rule to allow inspectors to use performance-based brake testers (PBBTs) to check the brakes on large trucks and buses for compliance with federal safety standards and to issue citations when these vehicles fail (67 FR 51770, August 9, 2002). The FMCSA evaluated several PBBTs during a round robin test series to assess their functional performance and potential use in law enforcement. The standard, a specific configuration of brake forces and wheel loads on a heavy-duty vehicle, was used to evaluate the candidate PBBTs and their operating protocols. The agency's rationale for use of the government-unique standards was to verify that these measurements and new technology could be used by law enforcement as an alternative to stopping distance tests or on-road deceleration tests. PBBTs |

are expected to save time and their use could increase the number of commercial motor vehicles that can be inspected in a given time. Only PBBTs that meet specifications developed by the FMCSA can be used to determine compliance with the Federal Motor Carrier Safety Regulations. The final rule represents a culmination of agency research that began in the early 1990s.

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

323

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

167

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

30

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| Acoustical Society of America | ASA |
| American Association of State Highway and Transportation Officials | AASHTO |
| American Gas Association | AGA |
| American National Standards Institute | ANSI |
| American Petroleum Institute | API |
| American Public Transportation Association | APTA |
| American Railway Engineering & Maintenance-of-Way Association | AREMA |

| | |
|---|---|
| American Society for Testing and Materials | ASTM |
| American Society of Civil Engineers | ASCE |
| American Society of Mechanical Engineers | ASME |
| Association of American Railroads | AAR |
| Canadian General Standards Board Tank Car Committee | CGSBTCC |
| Compressed Gas Association | CGA |
| Gas Technology Institute | GTI |
| Groupe de Travail Brussels 1958 | GTB |
| Institute of Electrical and Electronic Engineers | IEEE |
| Institute of Transportation Engineers | ITE |
| Intelligent Transportation Society of America | ITS |
| International Atomic Energy Agency | IAEA |
| International Maritime Organization | IMO |
| International Organization for Standardization | ISO |
| Manufacturers Standardization Society of the Valve and Fittings Industry, Inc. | MSS |
| NACE International | NACE |
| National Board of Boiler and Pressure Vessel Inspectors | NBBPVI |
| National Electrical Manufacturers Association | NEMA |
| National Fire Protection Association | NFPA |
| North American Transport of Dangerous Goods Standard Working Group | NATDGS |
| Organization for Economic Cooperation and Development | OECD |
| Society of Automotive Engineers | SAE |
| U.N. Committee on the Transport of Dangerous Goods | UNCTDG |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

DOT's modal agencies seem to vary as to reporting, but generally follow the above criteria.

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

A

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

A

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

A

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

No

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

DOT believes that Circular A-119 is working effectively and that the use of voluntary standards can save both time and money for regulatory agencies. We have no recommendation to change the Circular at this time.

*This following comment submitted in response to question number 10 (General Comments) is more appropriate here and has been added.*

I can't help to be concerned about the additional time it takes our regulatory agencies to report this information. Regulatory agencies from time to time, in order to better provide for the safety of our constituency, must enhance industry developed consensus standards. When these government unique standards are applied they are thoroughly vetted in the rulemaking process and all those involved have an opportunity to voice their concerns. It seems superfluous to have to repeat that activity here. Clearly, agencies will use voluntary consensus standards whenever possible, and resort to unique standards--which we believe are tough, but reasonable--for the protection of the public when the involved industry is reluctant to adopt more stringent protections.
8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:
The Federal Railroad Administration's (FRA) conformity assessment activities are visible internationally through expanded efforts in the area of safe, uniform international transport of hazardous materials by participation in the Canadian General Standards Board Tank Car Committee and the ASME Transportation Pressure Vessel Committee, as well as continuing to participate in the North American Transport of Dangerous Goods Standard (NATDGS) Working Group and the AAR Tank Car Committee, as reported last year.

Participation in voluntary consensus standards bodies as well as in numerous committees and sub-committees of those bodies gives FRA access to the developmental stages of private sector conformity assessment standards to make sure the agency viewpoint is

considered in the development of their standards. During data collection for this FY 2003 report at least eight additional standards, recommended practices, and regulations were identified which are being jointly developed through FRA-industry cooperation and are expected to be issued during FY 2004.

9. Please provide any examples or case studies of standards successes:
The Federal Motor Carrier Safety Administration (FMCSA) elected to use the recommendations of the accepted leaders in cardiovascular disease - NIH, American Heart Association, American College of Cardiology, to define medically acceptable blood pressure in commercial motor vehicle drivers. This accomplishes several things: It makes the recommendations less arbitrary or capricious, it gives the recommendations credibility, it makes it easier for the practicing doctor to remember and accept the guidelines, since it is consistent with what they are hearing from other organizations.

10. Please provide any other comments:

I can't help to be concerned about the additional time it takes our regulatory agencies to report this information. Regulatory agencies from time to time, in order to better provide for the safety of our constituency, must enhance industry developed consensus standards. When these government unique standards are applied they are thoroughly vetted in the rulemaking process and all those involved have an opportunity to voice their concerns. It seems superfluous to have to repeat that activity here. Clearly, agencies will use voluntary consensus standards whenever possible, and resort to unique standards--which we believe are tough, but reasonable--for the protection of the public when the involved industry is reluctant to adopt more stringent protections.

# Department of the Treasury

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

0

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

99

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

3

5 . Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

3

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| American National Standards Institute | ANSI |
| Data Interchange Standards Association, Inc. | DISAI |
| Workgroup for Electronic Data Interchange | WEDI |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

C

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

A

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

C

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

No

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

We believe that the guidance prescribed in Circular A-119 are effective. Circular A-119 has placed the focus on using voluntary standards as opposed to the development of government unique standards. Wide use of voluntary consensus standards promotes the development of an increased number of standards compliant products facilitating the use of new technology and increasing flexibility to meet new requirements.

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

None

9. Please provide any examples or case studies of standards successes:

None

10. Please provide any other comments:

I found the reporting tool to be very user friendly. I applaud the improvements made to this year's on-line reporting.

## Department of Veterans Affairs

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

0

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

0

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

4

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

17

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| American Industrial Hygiene Association | AIHA |
| American Institute of Timber Construction | AITC |
| American National Metric Council | ANMC |
| American National Standards Institute | ANSI |
| American Society for Testing and Materials | ASTM |
| American Society of Heating, Refrigerating, and Air-Conditioning Engineers | ASHRAE |
| American Society of Hospital Engineers | ASHE |
| American Society of Mechanical Engineers | ASME |
| Architecture and Transportation Barrier Compliance Board | ATBCB |
| Builders Hardware Manufacturers Association | BHMA |
| Federal Facilities Council | FFC |
| Interagency Committee on Seismic Safety in Construction | ICSS |
| Joint Commission on Accreditation of Healthcare Organizations | JCAHO |
| National Fire Protection Association | NFPA |
| National Institute for Occupational Safety and Health | NIOSH |
| National Institute of Building Sciences | NIBS |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

C

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

A

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

B

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

No

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

The Veterans Health Administration accepts and conforms to standards developed by the Joint Commission on Accreditation of Healthcare Organization (JCAHO) for Veterans Affairs (VA) health care facilities. Voluntary consensus standard requirements are utilized in the regulatory, contractual and grants determinations executed by the Veterans Health Administration.

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities
:

The VA does not engage in conformity assessments activities. VA strives to use industry based standards and commercial off-the-shelf products.

9. Please provide any examples or case studies of standards successes:

No Comment

10. Please provide any other comments:

Federal regulations prescribe standards that must be used (e.g., OSHA monitoring/sampling standards and EPA laboratory standards). Regardless of what may be developed by conformity assessment, VA is not relieved of its obligation to use standards prescribed by regulations. When not obligated to use prescribed regulatory or other (e.g., JCAHO) standard, VA organizations must retain the flexibility to use the standard that best meets its programmatic needs.

# Appendix F – Non-Cabinet Department and Commissions

# Agency for International Development

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

0

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

0

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

0

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

0

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

C

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

B

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

B

6- 4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

No

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

No

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

USAID has no recommendations for changing Circular A-119.

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

USAID participates in the Contractor Performance Reporting system developed and managed by the National Institutes for Health, including participating as a member of the committee that determines information requirements. This may be considered a conformity assessment activity since it is standardizing the way that the participating agencies assess contractors' performance.

9. Please provide any examples or case studies of standards successes:

Nothing to report for FY 2003.

10. Please provide any other comments:

No general comments about this reporting tool.

## Consumer Product Safety Commission

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

1

| Government Standard | Voluntary Standard | Rationale |
|---|---|---|
| FR/Vol. 68, No. 75/Friday, April 18, 2003, pp. 19142-19147, "Metal-Cored Candlewicks Containing Lead and Candles With Such Wicks" | Voices of Safety International (VOSI) standard on lead in candle wicks | The U.S. Consumer Product Safety Commission found that "the VOSI standard is technically unsound, and thus would not result in the elimination or adequate reduction of the risk, and that substantial compliance with it is unlikely." See FR/Vol. 68, No. 75/Friday, April 18, 2003, pp. 19145-19146, paragraph H2, "Voluntary Standards" for further information on this finding. |

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

0

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

31

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

7

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| American National Standards Institute | ANSI |
| American Society for Testing and Materials International | ASTMI |
| American Society of Mechanical Engineers | ASME |
| Canadian Standards Association | CSA |
| National Fire Protection Association | NFPA |
| Specialty Vehicle Institute of America | SVIA |
| Underwriters Laboratories | UL |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) not applicable?

A

6-2. Does your agency report: (a) The total number of standards it uses; (b) each instance where the agency uses (i.e. references) a standard; (c) both the total number and each instance; or (d) Not applicable?

A

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

A

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

No

6-5. does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

During FY 2003, the Commission's efforts to enhance voluntary safety standards development was complemented by the overall Federal policy set forth in the Circular. There are no recommendations for changes in the Circular at this time.

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

None

9. Please provide any examples or case studies of standards successes:

The CPSC staff provided technical support to the development of 22 new, revised, or reaffirmed voluntary consumer product safety standards which were completed in FY 2003. The Commission staff participated in 65 voluntary standards development projects during FY 2003.

10. Please provide any other comments:

The U.S. Consumer Product Safety Act (CPSA), as amended, requires the Commission to defer to issued voluntary standards, rather than promulgate mandatory standards, when the voluntary standards will eliminate or adequately reduce the risk of injury addressed and it is likely that there will be substantial compliance with the voluntary standards. In addition, the Commission is required, after any notice or advance notice of proposed rulemaking, to provide technical and administrative assistance to persons or groups who propose to develop or modify an appropriate voluntary standard. Additionally, the Commission is encouraged to provide technical and administrative assistance to groups developing product safety standards and test methods, taking into account Commission resources and priorities.

Since its inception in 1973, the Commission has promoted the development of voluntary product safety standards. Policy statements in support of voluntary standards were published by the CPSC in 1975 and 1978. These policy statements were updated in 1988 (16 U.S.C. 1031), and a staff directive on implementation of portions of these policy statements was promulgated in 1989 and updated in October 2001.

Since the principles set forth in the OMB Circular A-119 Rev. were published, the Commission has consistently supported them. The CPSC Voluntary Standards Coordinator, who also serves as the CPSC's Standards Executive for the purpose of implementing OMB Circular A-119 Rev., provides general oversight for staff involvement in existing standards projects. The Voluntary Standards Coordinator establishes agency views on standards issues and decisions through Commission response to staff briefing packages and recommendations. These views are reflected in the Commission's Operating Plan and Budget. Coordinating participation within the Commission and with others in voluntary standards activities is the responsibility of the Voluntary Standards Coordinator.

Likewise the Voluntary Standards Coordinator is responsible for meeting reporting requirements applicable to voluntary standards involvement of Commission staff. For further information please contact the CPSC's Standards Executive:

Mr. Colin B. Church, Voluntary Standards and International Activities Coordinator,
U.S. Consumer Product Safety Commission,
Room 702, 4330 East West Highway,
Bethesda, MD 20814. Tel. 301-504-7245, Fax. 301-504-0407, E-mail:
cchurch@cpsc.gov

December 1, 2003

# Environmental Protection Agency

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

25

| Government Standard | Voluntary Standard | Rationale |
|---|---|---|
| EPA Method 1 – Traverse Points, Stationary Sources | [1] ASTM D3154-00, Standard Method for Average Velocity in a Duct (Pitot Tube Method)<br><br>[2] ASTM D3154-91 (1995), "Standard Method for Average Velocity in a Duct (Pitot Tube Method)" | [1] 1. The standard appears to lack in quality control and quality assurance requirements. It does not include the following: (1) Proof that openings of standard pitot tube have not plugged during the test; (2) if differential pressure gauges other than inclined manometers (e.g., magnehelic gauges) are used, their calibration must be checked after each test series; and (3) the frequency and validity range for calibration of the temperature sensors. 2. They are too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements.<br><br>[2] Is too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements. |
| EPA Method 10 - Carbon Monoxide, NDIR | [1] ASTM D3162 (1994) Standard Test Method for Carbon Monoxide in the Atmosphere (Continuous Measurement by Non-dispersive Infrared | [1] This ASTM standard, which is stated to be applicable in the range of 0.5-100 ppm CO, does not cover the range of EPA Method 10 (20-1,000 ppm |

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| | Spectrometry)<br><br>[2] CAN/CSA Z223.21-M1978, Method for the Measurement of Carbon Monoxide: 3—Method of Analysis by Non-Dispersive Infrared Spectrometry; | CO) at the upper end (but states that it has a lower limit of sensitivity). Also, ASTM D3162 does not provide a procedure to remove carbon dioxide interference. Therefore, this ASTM standard is not appropriate for combustion source conditions. In terms of non-dispersive infrared instrument performance specifications, ASTM D3162 has much higher maximum allowable rise and fall times (5 minutes) than EPA Method 10 (which has 30 seconds).<br><br>[2] 1. This standard is lacking in the following areas: (1) Sampling procedures; (2) procedures to correct for the carbon dioxide concentration; (3) instructions to correct the gas volume if CO2 traps are used; (4) specifications to certify the calibration gases are within 2 percent of the target concentration; (5) mandatory instrument performance characteristics (e.g., rise time, fall time, zero drift, span drift, precision); (6) quantitative specification of the span value maximum as compared to the measured value: The standard specifies that the instruments should be compatible with the concentration of gases to be measured, whereas EPA |

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| | | Method 10 specifies that the instrument span value should be no more than 1.5 times the source performance standard. 2. Is too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements. |
| EPA Method 10A – Carbon Monoxide for Certifying CEMS | CAN/CSA Z223.21-M1978, Method for the Measurement of Carbon Monoxide: 3—Method of Analysis by Non-Dispersive Infrared Spectrometry. | 1. It is lacking in the following areas: (1) Sampling procedures; (2) procedures to correct for the carbon dioxide concentration; (3) instructions to correct the gas volume if CO2 traps are used; (4) specifications to certify the calibration gases are within 2 percent of the target concentration; (5) mandatory instrument performance characteristics (e.g., rise time, fall time, zero drift, span drift, precision); (6) quantitative specification of the span value maximum as compared to the measured value: The standard specifies that the instruments should be compatible with the concentration of gases to be measured, whereas EPA Method 10 specifies that the instrument span value should be no more than 1.5 times the source performance standard. 2. Is too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory |

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| | | requirements. |
| EPA Method 12 – Inorganic Lead, Stationary Sources | [1] ASTM D4358-94 (1999), "Standard Test Method for Lead and Chromium in Air Particulate Filter Samples of Lead Chromate Type Pigment Dusts by Atomic Absorption Spectroscopy"<br><br>[2] ASTM E1741-95 (1995), "Standard Practice for Preparation of Airborne Particulate Lead Samples Collected During Abatement and Construction Activities for Subsequent Analysis by Atomic Spectrometry"<br><br>[3] ASTM E1979-98 (1998), "Standard Practice for Ultrasonic Extraction of Paint, Dust, Soil, and Air Samples for Subsequent Determination of Lead"; | [1] These ASTM standards do not require the use of glass fiber filters as in EPA Method 12 and require the use of significantly different digestion procedures that appear to be milder than the EPA Method 12 digestion procedure. For these reasons, these ASTM standards cannot be considered equivalent to EPA Method 12. Also, the subject ASTM standards do not require the use of hydrogen fluoride (HF) as in EPA Method 29 and, therefore, they cannot be used for the preparation, digestion, and analysis of Method 29 samples. Additionally, Method 29 requires the use of a glass fiber filter, whereas these three ASTM standards require cellulose filters and other probable non-glass fiber media, which cannot be considered equivalent to EPA Method 29.<br><br>[2] These ASTM standards do not require the use of glass fiber filters as in EPA Method 12 and require the use of significantly different digestion procedures that appear to be milder than the EPA Method 12 digestion procedure. For these reasons, these ASTM standards cannot be |

considered equivalent to EPA Method 12. Also, the subject ASTM standards do not require the use of hydrogen fluoride (HF) as in EPA Method 29 and, therefore, they cannot be used for the preparation, digestion, and analysis of Method 29 samples. Additionally, Method 29 requires the use of a glass fiber filter, whereas these three ASTM standards require cellulose filters and other probable non-glass fiber media, which cannot be considered equivalent to EPA Method 29.

[3] These ASTM standards do not require the use of glass fiber filters as in EPA Method 12 and require the use of significantly different digestion procedures that appear to be milder than the EPA Method 12 digestion procedure. For these reasons, these ASTM standards cannot be considered equivalent to EPA Method 12. Also, the subject ASTM standards do not require the use of hydrogen fluoride (HF) as in EPA Method 29 and, therefore, they cannot be used for the preparation, digestion, and analysis of Method 29 samples. Additionally, Method 29 requires the use of a glass fiber filter, whereas these

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| | | three ASTM standards require cellulose filters and other probable non-glass fiber media, which cannot be considered equivalent to EPA Method 29. |
| EPA Method 2 – Velocity and S-type Pitot | [1] ASTM 3796-90 (1998), "Standard Practice for Calibration of Type S Pitot Tubes"<br><br>[2] ASTM D3464-96 (2001, Standard Test Method Average Velocity in a Duct Using a Thermal Anemometer<br><br>[3] ISO 10780:1994, Stationary Source Emissions-- Measurement of Velocity and Volume Flowrate of Gas Streams in Ducts<br><br>[4] ASTM D3154-00, Standard Method for Average Velocity in a Duct (Pitot Tube Method)<br><br>[5] ASTM D3154-91 (1995), “Standard Method for Average Velocity in a Duct (Pitot Tube Method); | [1] They are too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements.<br><br>[2] Applicability specifications are not clearly defined, e.g., range of gas composition, temperature limits. Also, the lack of supporting quality assurance data for the calibration procedures and specifications, and certain variability issues that are not adequately addressed by the standard limit EPA's ability to make a definitive comparison of the method in these areas.<br><br>[3] The standard recommends the use of an L-shaped pitot, which historically has not been recommended by EPA. The EPA specifies the S-type design, which has large openings that are less likely to plug up with dust.<br><br>[4] 1. The standard appears to lack in quality control and quality assurance requirements. It does not include the following: (1) Proof that openings of |

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| | | standard pitot tube have not plugged during the test; (2) if differential pressure gauges other than inclined manometers (e.g., magnehelic gauges) are used, their calibration must be checked after each test series; and (3) the frequency and validity range for calibration of the temperature sensors. 2. They are too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements.<br><br>[5] Is too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements. |
| EPA Method 23 – Dioxin and Furan (PCDD and PCDF) | European Committee for Standardization (CEN) EN 1948-3 (1997), "Determination of the Mass Concentration of PCDD'S/PCDF'S--Part 3: Identification and Quantification" | Is too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements. |
| EPA Method 24 – Surface Coatings, Volatile Matter Content | [1] ISO 11890-1 (2000) part 1, "Paints and Varnishes--Determination of Volatile Organic Compound (VOC) Content-Difference Method"<br><br>[2] ISO 11890-2 (2000) Part 2, "Paints and Varnishes--Determination of Volatile Organic Compound (VOC) Content-Gas Chromatographic | [1] Measured nonvolatile matter content can vary with experimental factors such as temperature, length of heating period, size of weighing dish, and size of sample. The standard ISO 11890-1 allows for different dish weights and sample sizes than the one size (58 millimeters in diameter and sample size of 0.5 gram) of EPA Method |

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| | Method" | 24. The standard ISO 11890-1 also allows for different oven temperatures and heating times depending on the type of coating, whereas EPA Method 24 requires 60 minutes heating at 110 degrees Celsius at all times. Because the EPA Method 24 test conditions and procedures "define" volatile matter, ISO 11890-1 is unacceptable as an alternative because of its different test conditions.<br><br>[2] ISO 11890-2 only measures the VOC added to the coating and would not measure any VOC generated from the curing of the coating. The EPA Method 24 does measure "cure" VOC, which can be significant in some cases, and, therefore, ISO 11890-2 is not an acceptable alternative to this EPA method. |
| EPA Method 25 – Gaseous Nonmethane Organic Emissions | [1] EN 12619:1999 Stationary Source Emissions--Determination of the Mass Concentration of Total Gaseous Organic Carbon at Low Concentrations in Flue Gases--Continuous Flame Ionization Detector Method<br><br>[2] ISO 14965:2000(E) Air Quality--Determination of Total Nonmethane Organic Compounds--Cryogenic Preconcentration and Direct | [1] The standards do not apply to solvent process vapors in concentrations greater than 40 ppm (EN 12619) and 10 ppm carbon (ISO 14965). Methods whose upper limits are this low are too limited to be useful in measuring source emissions, which are expected to be much higher.<br><br>[2] The standards do not apply to solvent process |

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| | Flame Ionization Method | vapors in concentrations greater than 40 ppm (EN 12619) and 10 ppm carbon (ISO 14965). Methods whose upper limits are this low are too limited to be useful in measuring source emissions, which are expected to be much higher. |
| EPA Method 25A – Gaseous Organic Concentration, Flame Ionization | [1] EN 12619:1999 Stationary Source Emissions--Determination of the Mass Concentration of Total Gaseous Organic Carbon at Low Concentrations in Flue Gases--Continuous Flame Ionization Detector Method<br><br>[2] ISO 14965:2000(E) Air Quality--Determination of Total Nonmethane Organic Compounds--Cryogenic Preconcentration and Direct Flame Ionization Method; | [1] The standards do not apply to solvent process vapors in concentrations greater than 40 ppm (EN 12619) and 10 ppm carbon (ISO 14965). Methods whose upper limits are this low are too limited to be useful in measuring source emissions, which are expected to be much higher.<br><br>[2] The standards do not apply to solvent process vapors in concentrations greater than 40 ppm (EN 12619) and 10 ppm carbon (ISO 14965). Methods whose upper limits are this low are too limited to be useful in measuring source emissions, which are expected to be much higher. |
| EPA Method 26 – Hydrogen Chloride, Halides, Halogens Emissions | EN 1911-1,2,3 (1998), "Stationary Source Emissions-- Manual Method of Determination of HCl--Part 1: Sampling of Gases Ratified European Text--Part 2: Gaseous Compounds Absorption Ratified European Text-- | Part 3 of this standard cannot be considered equivalent to EPA Method 26 or 26A because the sample absorbing solution (water) would be expected to capture both HCl and Cl2 gas, if present, without the ability to distinguish |

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| | Part 3: Adsorption Solutions Analysis and Calculation Ratified European Text" | between the two. The EPA Methods 26 and 26A use an acidified absorbing solution to first separate HCl and Cl2 gas so that they can be selectively absorbed, analyzed, and reported separately. In addition, in EN 1911 the absorption efficiency for Cl2 gas would be expected to vary as the pH of the water changed during sampling. |
| EPA Method 26A – Hydrogen Halide and Halogen, Isokinetic | EN 1911-1,2,3 (1998), "Stationary Source Emissions-- Manual Method of Determination of HCl--Part 1: Sampling of Gases Ratified European Text--Part 2: Gaseous Compounds Absorption Ratified European Text--Part 3: Adsorption Solutions Analysis and Calculation Ratified European Text" | Part 3 of this standard cannot be considered equivalent to EPA Method 26 or 26A because the sample absorbing solution (water) would be expected to capture both HCl and Cl2 gas, if present, without the ability to distinguish between the two. The EPA Methods 26 and 26A use an acidified absorbing solution to first separate HCl and Cl2 gas so that they can be selectively absorbed, analyzed, and reported separately. In addition, in EN 1911 the absorption efficiency for Cl2 gas would be expected to vary as the pH of the water changed during sampling. |
| EPA Method 28 (Section 10.1) – Wood Heaters, Certificate and Auditing | [1] ASME Power Test Codes, "Supplement on Instruments and Apparatus, part 5, Measurement of Quantity of Materials, Chapter 1, Weighing Scales"<br><br>[2] ASTM E319-85 | [1] It does not specify the number of initial calibration weights to be used nor a specific pretest weight procedure.<br><br>[2] This standard is not a complete weighing procedure because it does |

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| | (Reapproved 1997), "Standard Practice for the Evaluation of Single-Pan Mechanical Balances" | not include a pretest procedure. |
| EPA Method 29 – Metals Emissions from Stationary Sources | [1] CAN/CSA Z223.26-M1987, "Measurement of Total Mercury in Air Cold Vapour Atomic Absorption Spectrophotometeric Method" | [1] It lacks sufficient quality assurance and quality control requirements necessary for EPA compliance assurance requirements. |
| | [2] ASTM D4358-94 (1999), "Standard Test Method for Lead and Chromium in Air Particulate Filter Samples of Lead Chromate Type Pigment Dusts by Atomic Absorption Spectroscopy"<br><br>[3] ASTM E1741-95 (1995), "Standard Practice for Preparation of Airborne Particulate Lead Samples Collected During Abatement and Construction Activities for Subsequent Analysis by Atomic Spectrometry"<br><br>[4] ASTM E1979-98 (1998), "Standard Practice for Ultrasonic Extraction of Paint, Dust, Soil, and Air Samples for Subsequent Determination of Lead"; | [2] These ASTM standards do not require the use of glass fiber filters as in EPA Method 12 and require the use of significantly different digestion procedures that appear to be milder than the EPA Method 12 digestion procedure. For these reasons, these ASTM standards cannot be considered equivalent to EPA Method 12. Also, the subject ASTM standards do not require the use of hydrogen fluoride (HF) as in EPA Method 29 and, therefore, they cannot be used for the preparation, digestion, and analysis of Method 29 samples. Additionally, Method 29 requires the use of a glass fiber filter, whereas these three ASTM standards require cellulose filters and other probable non-glass fiber media, which cannot be considered equivalent to EPA Method 29.<br><br>[3] These ASTM standards do not require the use of |

glass fiber filters as in EPA Method 12 and require the use of significantly different digestion procedures that appear to be milder than the EPA Method 12 digestion procedure. For these reasons, these ASTM standards cannot be considered equivalent to EPA Method 12. Also, the subject ASTM standards do not require the use of hydrogen fluoride (HF) as in EPA Method 29 and, therefore, they cannot be used for the preparation, digestion, and analysis of Method 29 samples. Additionally, Method 29 requires the use of a glass fiber filter, whereas these three ASTM standards require cellulose filters and other probable non-glass fiber media, which cannot be considered equivalent to EPA Method 29.

[4] These ASTM standards do not require the use of glass fiber filters as in EPA Method 12 and require the use of significantly different digestion procedures that appear to be milder than the EPA Method 12 digestion procedure. For these reasons, these ASTM standards cannot be considered equivalent to EPA Method 12. Also, the subject ASTM standards do

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| | | not require the use of hydrogen fluoride (HF) as in EPA Method 29 and, therefore, they cannot be used for the preparation, digestion, and analysis of Method 29 samples. Additionally, Method 29 requires the use of a glass fiber filter, whereas these three ASTM standards require cellulose filters and other probable non-glass fiber media, which cannot be considered equivalent to EPA Method 29. |
| EPA Method 2C – Velocity and Flow Rate, Standard Pitot | ASTM D3154-00, Standard Method for Average Velocity in a Duct (Pitot Tube Method) | 1. The standard appears to lack in quality control and quality assurance requirements. It does not include the following: (1) Proof that openings of standard pitot tube have not plugged during the test; (2) if differential pressure gauges other than inclined manometers (e.g., magnehelic gauges) are used, their calibration must be checked after each test series; and (3) the frequency and validity range for calibration of the temperature sensors. 2. They are too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements. |
| EPA Method 3 – Molecular Weight Carbon Dioxide, Oxygen | [1] ASME C00031 or PTC 19-10-1981--part 10, "Flue and Exhaust Gas Analyses"<br><br>[2] ASTM D3154-00, | [1] Is too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements. |

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| | Standard Method for Average Velocity in a Duct (Pitot Tube Method) | [2] 1. The standard appears to lack in quality control and quality assurance requirements. It does not include the following: (1) Proof that openings of standard pitot tube have not plugged during the test; (2) if differential pressure gauges other than inclined manometers (e.g., magnehelic gauges) are used, their calibration must be checked after each test series; and (3) the frequency and validity range for calibration of the temperature sensors. 2. They are too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements. |
| EPA Method 320 – Vapor Phase Organic and Inorganic Emissions, FTIR | ASTM D6348-98, "Determination of Gaseous Compounds by Extractive Direct Interface Fourier Transform (FTIR) Spectroscopy" | Suggested revisions to ASTM D6348-98 were sent to ASTM by the EPA that, would allow the EPA to accept ASTM D6348-98 as an acceptable alternative. The ASTM Subcommittee D22-03 is currently undertaking a revision of ASTM D6348- 98. Because of this, we are not citing this standard as an acceptable alternative for EPA Method 320 in the final rule today. However, upon successful ASTM balloting and demonstration of technical equivalency with the EPA FTIR methods, the revised ASTM standard could be |

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| | | incorporated by reference for EPA regulatory applicability. In the interim, facilities have the option to request ASTM D6348-98 as an alternative test method under 40 CFR 63.7(f) and 63.8(f) on a case-by-case basis. |
| EPA Method 3A – Carbon Dioxide and Oxygen Concentrations, IAP | [1] ASTM D5835-95, Standard Practice for Sampling Stationary Source Emissions for Automated Determination of Gas Concentration<br><br>[2] CAN/CSA Z223.2-M86(1986), Method for the Continuous Measurement of Oxygen, Carbon Dioxide, Carbon Monoxide, Sulphur Dioxide, and Oxides of Nitrogen in Enclosed Combustion Flue Gas Stream<br><br>[3] ISO 10396:1993, Stationary Source Emissions: Sampling for the Automated Determination of Gas Concentrations<br><br>[4] ISO 12039:2001, Stationary Source Emissions-- Determination of Carbon Monoxide, Carbon Dioxide, and Oxygen--Automated Methods | [1] 1. They lack in detail and quality assurance/quality control requirements. Specifically, these two standards do not include the following: (1) Sensitivity of the method; (2) acceptable levels of analyzer calibration error; (3) acceptable levels of sampling system bias; (4) zero drift and calibration drift limits, time span, and required testing frequency; (5) a method to test the interference response of the analyzer; (6) procedures to determine the minimum sampling time per run and minimum measurement time; and (7) specifications for data recorders, in terms of resolution (all types) and recording intervals (digital and analog recorders, only). 2. Is too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements.<br><br>[2] 1. It does not include quantitative specifications for measurement system performance, most notably the calibration procedures |

and instrument performance characteristics. The instrument performance characteristics that are provided are nonmandatory and also do not provide the same level of quality assurance as the EPA methods. For example, the zero and span/calibration drift is only checked weekly, whereas the EPA methods requires drift checks after each run. 2. Is too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements.

[3] 1. They lack in detail and quality assurance/quality control requirements. Specifically, these two standards do not include the following: (1) Sensitivity of the method; (2) acceptable levels of analyzer calibration error; (3) acceptable levels of sampling system bias; (4) zero drift and calibration drift limits, time span, and required testing frequency; (5) a method to test the interference response of the analyzer; (6) procedures to determine the minimum sampling time per run and minimum measurement time; and (7) specifications for data recorders, in terms of resolution (all types) and recording intervals (digital and analog recorders, only).

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| | | 2. Is too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements.<br><br>[4] This ISO standard is similar to EPA Method 3A, but is missing some key features. In terms of sampling, the hardware required by ISO 12039:2001 does not include a 3-way calibration valve assembly or equivalent to block the sample gas flow while calibration gases are introduced. In its calibration procedures, ISO 12039:2001 only specifies a two-point calibration while EPA Method 3A specifies a three-point calibration. Also, ISO 12039:2001 does not specify performance criteria for calibration error, calibration drift, or sampling system bias tests as in the EPA method, although checks of these quality control features are required by the ISO standard. |
| EPA Method 3B – Oxygen, Carbon Dioxide, Carbon Monoxide, Emission Rate Correction Factor | [1] ASTM D3154-00, Standard Method for Average Velocity in a Duct (Pitot Tube Method)<br><br>[2] ASTM D3154-91 (1995), "Standard Method for Average Velocity in a Duct (Pitot Tube Method)" | [1] 1. The standard appears to lack in quality control and quality assurance requirements. It does not include the following: (1) Proof that openings of standard pitot tube have not plugged during the test; (2) if differential pressure gauges other than inclined manometers (e.g., |

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| | | magnehelic gauges) are used, their calibration must be checked after each test series; and (3) the frequency and validity range for calibration of the temperature sensors. 2. They are too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements.<br><br>[2] Is too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements. |
| EPA Method 4 – Moisture Content in Stack Gases | [1] ASTM E337-84 (1996), "Standard Test Method for Measuring Humidity with a Psychrometer (the Measurement of Wet- and Dry-Bulb Temperatures)"<br><br>[2] ASTM D3154-00, Standard Method for Average Velocity in a Duct (Pitot Tube Method)<br><br>[3] ASTM D3154-91 (1995), "Standard Method for Average Velocity in a Duct (Pitot Tube Method)" | [1] They are too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements.<br><br>[2] 1. The standard appears to lack in quality control and quality assurance requirements. It does not include the following: (1) Proof that openings of standard pitot tube have not plugged during the test; (2) if differential pressure gauges other than inclined manometers (e.g., magnehelic gauges) are used, their calibration must be checked after each test series; and (3) the frequency and validity range for calibration of the temperature sensors. 2. They are too general, too broad, or not sufficiently |

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| | | detailed to assure compliance with EPA regulatory requirements.<br><br>[3] Is too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements. |
| EPA Method 5 – Particulate Matter, Stationary Sources | [1] ASME PTC-38-80 R85 or C00049, "Determination of the Concentration of Particulate Matter in Gas Streams"<br><br>[2] ASTM D3685/D3685M-98, “Test Methods for Sampling and Determination of Particulate Matter in Stack Gases.”<br><br>[3] ISO 9096:1992, "Determination of Concentration and Mass Flow Rate of Particulate Matter in Gas Carrying Ducts-- Manual Gravimetric Method" | [1] It lacks sufficient quality assurance and quality control requirements necessary for EPA compliance assurance requirements.<br><br>[2] It lacks sufficient quality assurance and quality control requirements necessary for EPA compliance assurance requirements.<br><br>[3] It lacks sufficient quality assurance and quality control requirements necessary for EPA compliance assurance requirements. |
| EPA Method 515.4 – Chlorinated Acids in DW by LL Fast CG/ECD | [1] ASTM D5317-98 -- Standard Test Method For Determination of Chlorinated Organic Acid Compounds in Water by Gas Chromatography With an Electron Capture Detector<br><br>[2] Standard Method 6640 B for the chlorinated acids | [1] ASTM D5317-98 specifies acceptance windows for the initial demonstration of proficiency for laboratory fortified blank samples that are as small as 0 percent to as large as 223 percent recovery for picloram, with tighter criteria for other regulated contaminants. Therefore, this method permits unacceptably large control limits, which include 0 percent recovery. |

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| | | [2] The use of this voluntary consensus standard would have been impractical due to significant shortcomings in the sample preparation and quality control sections of the method instructions. Section 1b of Method SM 6640 B states that the alkaline wash detailed in section 4b2 is optional. The hydrolysis that occurs during this step is essential to the analysis of the esters of many of the analytes. Therefore, this step is necessary and cannot be optional. In addition, the method specifies that the quality control limits for laboratory-fortified blanks are to be based upon plus or minus three times the standard deviation of the mean recovery of the analytes, as determined in each laboratory. Therefore, this method permits unacceptably large control limits, which may include 0 percent recovery. |
| EPA Method 531.2 – N-Methylcarbamoylozimes/ates, Aqueous In/HPLC | [1] Standard Method 6610, 20th Edition<br><br>[2] Standard Method 6610, 20th Supplemental Edition | [1] Standard Method 6610, 20th Edition has recently been approved for compliance monitoring. Standard Method 6610, 20th Supplemental Edition permits the use of a strong acid, hydrochloric acid (HCL), as a preservative. The preservatives in all of the other approved EPA and Standard Methods |

procedures for these analytes are weak acids that adjust the pH to a specific value based upon the pKa of the preservative. The use of HCL would require accurate determinations of the pH of the sample in the field and could be subject to considerable error and possible changes in pH upon storage. Although not specifically observed for oxamyl or carbofuran during the development of similar methods, structurally similar pesticides have been shown to degrade over time when kept at pH 3. Therefore, approval of this method is impractical because it specifies the use of a strong acid (HCL) when positive control of the pH is critical.

[2] Standard Method 6610, 20th Edition has recently been approved for compliance monitoring. Standard Method 6610, 20th Supplemental Edition permits the use of a strong acid, hydrochloric acid (HCL), as a preservative. The preservatives in all of the other approved EPA and Standard Methods procedures for these analytes are weak acids that adjust the pH to a specific value based upon the pKa of the preservative. The use of HCL would require accurate determinations of

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| | | the pH of the sample in the field and could be subject to considerable error and possible changes in pH upon storage. Although not specifically observed for oxamyl or carbofuran during the development of similar methods, structurally similar pesticides have been shown to degrade over time when kept at pH 3. Therefore, approval of this method is impractical because it specifies the use of a strong acid (HCL) when positive control of the pH is critical. |
| EPA Method GG – (Title not found in index) | ASTM D3031-81 – Method of Test for Total Sulfur in Natural Gas (Hyrogenation), Withdrawn | This method has been deleted from the final rule because it was discontinued by the ASTM in 1990 with no replacement. If the total sulfur content of the fuel being fired in the turbine is less than 0.4 weight percent, we are adding a provision that the following methods may be used to measure the sulfur content of the fuel: ASTM D4084-82 or 94, D5504-01, D6228-98, or the Gas Processors Association Method 2377-86. This provision is consistent with the provision in 40 CFR 60.13(j)(1) allowing alternatives to reference method tests to determine relative accuracy of CEMS for sources with emission rates demonstrated to be less than 50 percent of the applicable standard. |

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| EPA Performance Specification 2 (nitrogen oxide portion only) | ISO 10849:1996, "Determination of the Mass Concentration of Nitrogen Oxides--Performance | Is too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements. |
| EPA Performance Specification 2 (sulfur dioxide portion only) | ISO 7935:1992, "Stationary Source Emissions--Determination of the Mass Concentration of Sulfur Dioxide--Performance Characteristics of Automated Measuring Methods" | Is too general, too broad, or not sufficiently detailed to assure compliance with EPA regulatory requirements. |

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

109

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

44

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

21

| Voluntary Consensus Standards Body | Acronym |
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| American Chemical Society | ACS |
| American National Standards Institute | ANSI |
| American Petroleum Business Federation | APBF |
| American Pharmoecopia Association | APHA |
| American Society for Quality | ASQ |
| American Society for Testing and Materials International | ASTMI |
| American Society of Mechanical Engineers | ASME |
| American Water Works Association | AWWA |
| Association of Analytical Communities International | AOAC |
| Environmental Data Standards Council | EDSC |

| | |
|---|---|
| Federal Geographic Data Committee | FGDC |
| International Electrotechnical Commission | IEC |
| International Organization for Standardization | ISO |
| Multi-Agency Radiological Laboratory Analytical Protocols | MARLAP |
| National Environmental Laboratory Accreditation Council | NELAC |
| National Fire Protection Association | NFPA |
| National Sanitation Foundation International | NSF International |
| Open GIS Consortium | Open-GIS |
| Registrar Accreditation Board | RAB |
| Water Environment Federation | WEF |
| World Wide Web Consortium | W3C |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

C

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

B

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

A

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

No recommendations at this time.

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

National Environmental Laboratory Accreditation Program

9. Please provide any examples or case studies of standards successes:

10. Please provide any other comments:

# Federal Communications Commission

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

0

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?\

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

0

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

5

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

7

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| American National Standards Institute | ANSI |
| Cellular Telecommunications and Internet Association | CTIA |
| Institute of Electrical and Electronic Engineers | IEEE |
| International Commission on Non-Ionizing Radiation Protection | ICNIRP |
| National Council of Radiation Protection and Measurements | NCRPM |
| National Institute of Standards and Technology | NIST |
| Telecommunications Industry Association | TIA |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?\

B

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

A

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

C

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

The policies of OMB Circular A-119 are clearly stated for application to the activities of the FCC, and the Commission recognizes the benefit of using voluntary consensus standards when applicable.

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

None

9. Please provide any examples or case studies of standards successes:

10. Please provide any other comments:

This web-based procedure for reporting works well.

# Federal Trade Commission

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

0

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

0

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

0

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

0

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

All of the questions 6.1 to 6.5 are not applicable to the FTC standards program.

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

D

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

D

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

D

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

No

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

No

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

See response to question 10.

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

See response to question 10.

9. Please provide any examples or case studies of standards successes:

See response to question 10.

10. Please provide any other comments:

The Federal Trade Commission is an independent agency of the United States Government charged with enforcing competition and consumer protection laws. The Commission's only contact with voluntary consensus standards and the organizations that produce them is in connection with the enforcement of the Federal Trade Commission Act, which prohibits unfair methods of competition and unfair or deceptive acts or practices affecting commerce. The Commission does not promulgate its own standards or engage in other standards activities pertinent to OMB Circular A-119.

# General Services Administration

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

3

| Government Standard | Voluntary Standard | Rationale |
|---|---|---|
| Federal Specification A-A-1925 - Shield, Expansion (Nail Anchors) | ASTM E488 - Standard Test Methods for Strength of Anchors in Concrete and Masonry Elements | This government-unique standard is prepared & maintained by the Defense Logistics Agency (DLA). Both the GSA & DLA contract for products that reference A-A-1925. In order to maintain product continuity in the Federal marketplace, we must cite the standard as the DLA. |
| Federal Specification KKK-A-1822E - Federal Specification for Ambulances | ASTM F2020 - Standard Practice for Design, Construction, and Procurement of Emergency Medical Services Ambulances | The ASTM "Standard Practice for Design, Construction, and Procurement of Emergency Medical Services (EMSS) Ambulances" (ASTM F2020) is not practical for use, and therefore GSA uses the Federal Specification for Ambulances (KKK-A-1822E). GSA has determined the ASTM document is not practical for use for the following reasons:<br><br>1) GSA has determined that ASTM F2020 contains specific practices that are technically and economically impractical to use for the acquisition of commercial based vehicles because the document is |

financially burdensome and technically ineffective. Specifically at issue is the ASTM Standard Specification for Medical Oxygen Delivery Systems for EMS Ground Vehicles, F1949-99 which is inclusive to ASTM F2020.

2) GSA has determined that ASTM F2020 is impractical because it is defined as a "standard practice" which is ambiguous and an ineffective substitution for specifications or requirements for use in GSA contract documents. ASTM F1949-99, a Standard Specification for Medical Oxygen Delivery Systems for EMS Ground Vehicles is included in ASTM F2020. ASTM F1949-99 is defined as a "standard specification".

3) GSA has determined that ASTM F2020 is impractical because ASTM International does not provide interpretations and written guidance to their publications which is inadequate and less useful. ASTM members may only offer personal opinions. ASTM offers no mechanism to support timely resolution of conflicts between contractor and procurement organizations on technical subject matter. GSA provides interpretations,

clarifications and engineering determinations when required. This is one of the most important concerns presented by the Ambulance Manufacturers Division (AMD).

4) The AMD has determined through consensus that it is impractical to replace the Federal Specification for Ambulances, KKK-A-1822E with the ASTM Standard Practice, F2020. GSA initiated a survey to collect public responses from a wide range of constituent users of the Federal Ambulance Specification. The National Association of Emergency Medical Technicians (NAEMT), the International Association of Fire Chiefs (IAFC), the National Association of State EMS Directors (NASEMSD) and the National Association of EMS Physicians universally accept and support the continued use of the Federal Specification. The AMD and constituent users have determined that it is impractical to replace the Federal Specification for Ambulances, KKK-A-1822E with the ASTM Standard Practice, F2020 because rule promulgation is burdensome and costly. Staff and administration resources would need to be

| | | |
|---|---|---|
| | | diverted in each state EMS office to implement the change in statutes, public health codes, rules and regulations.<br><br>5) GSA has determined that ASTM F2020 is impractical because it is burdensome to GSA procurement efforts. While the current ASTM document recites many of the requirements from the Federal Specification, a future ASTM document would likely have diverging requirements unacceptable to the Government. This was verified by a member of the ASTM F2020 subcommittee at the September 4, 2003 meeting of the Federal Interagency Committee on Emergency Medical Services. |
| MIL-G-9954 - Glass Beads for Cleaning and Peening | SAE/AMS 2431 - Peening Media, General Requirements | This government-unique standard contains specific size & performance required for Air Force critical applications that are not present in the voluntary standards. |

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

391

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

26

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| Aerospace Industries Association of America | AIA |
| Ambulance Manufacturers Division, National Truck Association | AMD/NTEA |
| American Gas Association | AGA |
| American National Standards Institute | ANSI |
| American Society for Testing and Materials | ASTM |
| American Society of Heating, Refrigerating, and Air-Conditioning Engineers | ASHRAE |
| American Society of Mechanical Engineers | ASME |
| Automotive Lift Institute - ALOIM | ALI |
| Builders Hardware Manufacturers Association | BHMA |
| Building Products Pre-Approval Program | BPPAP |
| Business and Institutional Furniture Manufacturers Association | BIFMA |
| Gas Appliance Manufacturers Association | GAMA |
| Hardwood Plywood & Veneer Association | HPVA |
| International Building Codes | IBC |
| Maintenance Council of American Trucking Associations | TMC/ATA |
| National Aerospace and Defense Contractors Accreditation Program | NADCAP |
| National Building Codes | NBC |
| National Fire Protection Association | NFPA |
| National Institute of Building Sciences | NIBS |
| National Sanitation Foundation | NSF |
| Performance Review Institute | PRI |
| Society of Automotive Engineers | SAE |
| Steel Door Institute | SDI |
| Technical Association of the Pulp and Paper Industry | TAPPI |
| The Society for Protective Coatings | SSPC |
| Underwriters Laboratories | UL |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

C

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

A

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

B

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

No

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

No comments

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

The Unified Facilities Guide Specification 09900, US Army Corps of Engineers, Air Force Office of Civil Engineering and Naval Facilities Engineering Command, adopted Master Painters Institute (MPI) standards for all coatings used in new construction and maintenance. Approved coatings listed in the MPI Approved Products List can only be used for facilities applications. 6FEE requires solicitation offers comply with this Guide Specification, referencing the MPI Approved Products List as the approved vendor's list.

USDA Forest Service

Joint meeting (May 2003) with representatives from the USDA Forest Service Missoula and San Dimas Technology & Development Centers. Discussed new requirements for wildland fire suppression equipment and abolishing the practice of allowing third-party certification to NFPA standards for protective clothing and equipment. Discussed procedures for first article testing and acceptance for water-handling fire suppression equipment.

National Fire Protection Association (NFPA) Technical Committee on Wildland Fire Fighting Protective Clothing and Equipment

Committee meeting in Atlanta, Georgia (January 2003) to continue work on revision of NFPA Standard 1977. As part of the revision process of NFPA Standard 1977 (Protective Clothing & Equipment for Wildland Fire Fighting), the government-unique requirements for the fire shelter will be dropped from the standard. A performance based standard will be developed for inclusion in the following revision of NFPA 1977. A new government (Forest Service) specification for a new, improved design of the fire shelter is just now being implemented and it was determined that adequate performance data could not be developed in time for the upcoming revision of NFPA 1977.

9. Please provide any examples or case studies of standards successes:

None

10. Please provide any other comments:

Full Rationale for retention of KKK-A-1822E in lieu of ASTM F2020

GSA used The Federal Specification for Ambulances, KKK-A-1822E in lieu of the ASTM "Standard Practice for Design, Construction, and Procurement of Emergency Medical Services (EMSS) Ambulances" (ASTM F2020).

Background:

GSA developed and issued the Federal specification in 1974 at the request of the Department of Transportation (NHTSA). It was to be for mandatory usage by the states for the purchasing of ambulances with Federal funding under the Highway Safety Act. At the same time GSA started to use the specification for the purchase of ambulances for Federal civilian agencies. In the early 1980's, GSA started purchasing the military's non-tactical ambulances using a military specification. Subsequently this military specification was cancelled, and the military ambulances were also purchased with the Federal Ambulance Specification. Also starting in the early 1970's many of the states began mandating the use of the Federal specification regardless of the source of funding, and to this day, the states continue to use the Federal specification even though Federal funding is no longer available.

Rationale for use

The ASTM "Standard Practice for Design, Construction, and Procurement of Emergency Medical Services (EMSS) Ambulances" (ASTM F2020) is not practical for use, and therefore GSA uses the Federal Specification for Ambulances (KKK-A-1822E). GSA has determined the ASTM document is not practical for use for the following reasons:

1. GSA has determined that ASTM F2020 contains specific practices that are technically and economically impractical to use for the acquisition of commercial based vehicles because the document is financially burdensome and technically ineffective as detailed below. Specifically at issue is the ASTM Standard Specification for Medical Oxygen Delivery Systems for EMS Ground Vehicles, F1949-99 which is inclusive to ASTM F2020.

Both the KKK and ASTM requirements are functionally equivalent as they are related to the design, performance and installation for the medical oxygen delivery systems. The deviation exists between the GSA Federal Standard KKK-A-1822E and ASTM F2020/F1949-99 in the testing requirements. Specifically, ASTM F1949-99 requires additional destructive testing to validate conformance. The Ambulance Manufacturers Division (AMD) of the National Truck Equipment Association, representing the entire domestic and Canadian ambulance manufacturing industry, estimates this additional testing requirement will be in excess of five times the cost to certify an entire ambulance under the current Federal Specification.

GSA is not aware of any safety, reliability or performance issues associated with oxygen delivery systems installed, tested and certified in accordance with KKK-A-1822. The AMD Standard 015- Ambulance Main Oxygen System Test was voluntarily developed through consensus, adopted and used by industry as the testing method to obtain independent third party validation. The AMD Standard 015, adopted by GSA and included within the Federal specification KKK-A-1822, has not been proven to be inadequate or ineffective. GSA and the AMD are not aware that the ASTM F1949-99 specification has ever been adopted and used for procurement of any type of commercial vehicle. The benefits of the ASTM F1949-99 are unproven, and therefore are ineffective, relative to a predictable cost burden.

2. GSA has determined that ASTM F2020 is impractical because it is defined as a “standard practice” which is ambiguous and an ineffective substitution for specifications or requirements for use in GSA contract documents. ASTM F1949-99, a Standard Specification for Medical Oxygen Delivery Systems for EMS Ground Vehicles is included in ASTM F2020. ASTM F1949-99 is defined as a “standard specification”. Specifically in the ASTM publication “Form and Style for ASTM Standards”, under Part F entitled, “CAVEATS AND OTHER LEGAL ASPECTS IN STANDARDS” the following paragraph is provided regarding the ASTM “standard practices”.

Standard Practice—This practice offers a set of instructions for performing one or more specific operations. This document cannot replace education or experience and should be used in conjunction with professional judgment. Not all aspects of this practice may be applicable in all circumstances. This ASTM standard is not intended to represent or replace the standard of care by which the adequacy of a given professional service must be judged, nor should this document be applied without consideration of a project’s many unique aspects. The word “Standard” in the title means only that the document has been approved through the ASTM consensus process.

If GSA were to cite the ASTM document as our contract specification, the above paragraph would allow any manufacturer to make their own "judgment" as to how they would be in compliance with our contract. This is because ASTM states that the "document cannot replace education or experience and should be used in conjunction with professional judgment" [refer to ASTM publication "Form and Style for ASTM Standards", under Part F]. As a result, the ASTM document (practices) cited in a contract would be subject to different interpretations by both the contractor and the government. Under contract law this is defined as an "ambiguity" and therefore must be avoided or the government will suffer the consequences. Conversely, GSA writes and is clearly the responsible authority on all details of the Federal Ambulance Specification. Whenever an issue surfaces with our contractor, it is easily defined and settled without legal conflict. The ASTM document states that "nor should this document be applied without consideration of a project's many unique aspects" [refer to ASTM publication "Form and Style for ASTM Standards", under Part F]. GSA and the AMD have given careful consideration to the "many unique aspects" of ambulances, their varied applications, and their procurement. As a result, GSA has determined that the ASTM document (practices) is ineffective for citation in contract documents.

3. GSA has determined that ASTM F2020 is impractical because ASTM International does not provide interpretations and written guidance to their publications which is inadequate and less useful. ASTM members may only offer personal opinions. ASTM offers no mechanism to support timely resolution of conflicts between contractor and procurement organizations on technical subject matter. GSA provides interpretations, clarifications and engineering determinations when required. This is one of the most important concerns presented by the AMD. ASTM's position is stated in their letter dated 30 July 2002 [ See Attachment 1]. ASTM will not provide an interpretation of a technical requirement, a position which GSA has determined is inadequate and less useful. GSA constantly makes determinations of whether or not our contractors are in compliance with the Federal Ambulance Specification cited in our contracts. If GSA used the ASTM document, and a contractual issue arose as to a definition there would be no authority to make a binding determination. In the event of a dispute, GSA is concerned that it would take both time and expense to settle, which may have to be solved through litigation which would result in unacceptable delays in deliveries of ambulances to customer agencies.

4. The AMD has determined through consensus that it is impractical to replace the Federal Specification for Ambulances, KKK-A-1822E with the ASTM Standard Practice, F2020 as noted in their letter, dated July 31, 2003 [See Attachment 2]. GSA initiated a survey to collect public responses from a wide range of constituent users of the Federal Ambulance Specification. The National Association of Emergency Medical Technicians (NAEMT), the International Association of Fire Chiefs (IAFC), the National Association of State EMS Directors (NASEMSD) and the National Association of EMS Physicians universally accept and support the continued use of the Federal Specification.

The AMD and constituent users have determined that it is impractical to replace the

Federal Specification for Ambulances, KKK-A-1822E with the ASTM Standard Practice, F2020 because rule promulgation is burdensome and costly. Staff and administration resources would need to be diverted in each state EMS office to implement the change in statutes, public health codes, rules and regulations. The AMD and the listed constituent users identified no benefits to be gained relative to the burdens and costs associated with replacing the Federal Specification for Ambulances, KKK-A-1822E with the ASTM Standard Practice, F2020.

5. GSA has determined that ASTM F2020 is impractical because it is burdensome to GSA procurement efforts. While the current ASTM document recites many of the requirements from the Federal Specification, a future ASTM document would likely have diverging requirements unacceptable to the Government. This was verified by a member of the ASTM F2020 subcommittee at the September 4, 2003 meeting of the Federal Interagency Committee on Emergency Medical Services.

Specifically, future ASTM changes may not be in GSA's or in the public's interest. It would be a burden to GSA to stay abreast of activities of others and their special interests. The driving forces behind these diverging requirements are parochial business interests that may determine the direction of issues that relate to safety, function, reliability and cost. Conversely, GSA's responsibility (without being driven by other interests) is to have a procurement specification that results in the safest, most functional and reliable ambulance at the lowest possible cost. The government's ability to selectively exclude content of a voluntary consensus standard is not justifiable, is less useful and is ineffective as compared to using an established standard which wholly satisfies the agency mission. This also goes to the heart of the issue on the appropriate use of "consensus standards". While GSA is not categorically against the use of consensus standards (which we successfully use in many areas), GSA clearly finds it impractical in this case, and certainly not in the government's or publics best interest especially when lives are at stake.

As required by OMB Circular No. A-119, GSA has made determination based upon the five reasons that the ASTM "Standard Practice for Design, Construction, and Procurement of Emergency Medical Services (EMSS) Ambulances" (ASTM F2020) would not be a suitable or a practical replacement for the Federal Specification for Ambulances, (KKK-A-1822E). GSA's use of the ASTM F2020 in lieu of Federal Specification for Ambulances, (KKK-A-1822E) is impractical because it is ineffective, ambiguous, burdensome, inadequate and less useful to do so.

## Government Printing Office

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

0

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

126

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

2

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

4

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| American Society for Testing and Materials | ASTM |
| International Organization for Standardization | ISO |
| National Committee for Information Technology Standards | NCITS |
| Technical Association of the Pulp and Paper Industry | TAPPI |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

6-1 Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

C

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

A

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

A

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

The Circular provides effective procedures for the transition to use of voluntary consensus standards in Government business. We have no recommendations for changes.

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

We were not involved in any assessment activities in FY 2003

9. Please provide any examples or case studies of standards successes:

10 . Please provide any other comments:

This format / reporting tool is great

# National Aeronautics and Space Administration

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

This agency reports voluntary consensus standards usage on a categorical basis

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

1

| Voluntary Standard | Government Standard |
|---|---|
| ASTM-MANL-36 | NSS 1740.15 |

3. Please provide the number of voluntary consensus standards used during FY 2003?

266

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

144

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

33

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| Acoustical Society of America | ASA |
| Aerospace Industries Association of America | AIA |
| American Bearing Manufacturers Association | ABMA |
| American Institute of Aeronautics and Astronautics | AIAA |
| American Society for Metals | ASM |
| American Society for Quality | ASQ |
| American Society for Testing and Materials | ASTM |
| American Society of Agricultural Engineers | ASAE |
| American Society of Mechanical Engineers | ASME |
| American Society of Non-Destructive Testing | ASNT |
| American Welding Society | AWS |
| Association for Information and Image Management | AIIM |
| Committee on Earth Observing Satellites | CEOS |

| | |
|---|---|
| Computational Fluid Dynamics General Notational System | CGNS |
| Consultative Committee for Space Data Systems | CCSDS |
| Electronic Industries Alliance | EIA |
| Electronic Industries Association/American National Standards Institute | EIA/ANSI |
| Government Electronics & Information Technology Association | GEITA |
| Industrial Technology Research Institute | ITRI |
| Institute for Interconnecting and Packaging Electronic Circuits-Association Connecting Electronics Industries | IPC |
| Institute of Electrical and Electronic Engineers | IEEE |
| Institute of Environment Sciences and Technology | IEST |
| International Electrotechnical Commission | IEC |
| International Organization for Standardization | ISO |
| International Organization for Standardization/International Electrotechnical Commission | ISO/IEC |
| National Association of Corrosion Engineers | NACE |
| National Conference of Standards Laboratories | NCSL |
| National Fire Protection Association | NFPA |
| Radio Technical Commission for Aeronautics | RTCA |
| Society of Automotive Engineers | SAE |
| Space Frequency Coordination Group | SFCG |
| The Internet Society | ISOC |
| Welding Research Council | WRC |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

A

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

B

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

A

6-4 Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

No

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

OMB Circular A-119 continues to provide stimulus for NASA's effort to enhance the use of Voluntary Consensus Standards, challenge the need for NASA-unique Technical Standards requirements, and improve its Technical Standards System. As a result, NASA has increased its participation with Voluntary Consensus Standards bodies in standards activities by 10% from FY2002
.

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

As an acquisition-oriented Agency, conformity assessment is an important element of our policies and procedures to assure the safety and mission success of NASA programs. NASA is continuously evaluating and improving its conformity assessment practices and procedures. NASA has a long-standing practice of working with other Government Agencies and the public sector to integrate best practices into its activities. NASA continues to work with the Department of Defense (DoD) and the aerospace industry to adopt and define consistent quality practices. NASA routinely utilizes other Government Agencies to assist us with Contract Administration Services (CAS), including substantial conformity assessment activities. The Defense Contract and Audit Agency, Defense Contract Management Agency, Office of Naval Research, and other activities continue to provide conformity assessment services for NASA programs. These are ongoing relationships that utilize the expertise and infrastructure that are resident within these agencies and allow NASA to limit NASA internal assessments to areas where external capabilities are not available. The management and monitoring processes established for these CAS activities provide a mechanism to continually exchange ideas and best practices related to conformity assessment. Finally, NASA continues to pursue Star Status in the Occupational Safety and Health Administration's (OSHA) Voluntary Protection Program (VPP). Participation in the VPP provides a mechanism for both improving internal safety practices and for utilizing the services of the OSHA programs to perform oversight inspections. NASA Centers not certified are in various stages of preparation for assessment by OSHA.

9. Please provide any examples or case studies of standards successes:

NASA's Agency-wide Full-Text Technical Standards System provides one-stop, easy access to technical standards required for use by the Agency's programs and projects. In FY02, 31,093 Voluntary Consensus Standards (VCSs) and 21,149 Government standards were downloaded by NASA and its onsite support contractor personnel. In FY03, 41,831 VCSs and 28,127 Government standards were downloaded. Based on these metrics, downloading of VCSs increased 34% from the previous year. NASA employees lead or participate in the development of 197 Voluntary Consensus Standards from 34 different Standards Developing Organizations' Committees.

NASA's Standards Update Notification System (SUNS) provides update notification on a daily basis of changes to technical standards being utilized by programs and projects . Update notifications were requested for 2522 unique VCSs in FY02 and 799 in FY03, for a total of 3321 unique VCSs being tracked for changes.

The linking of lessons learned to relevant technical standards continues to enhance and improve engineering practices across the Agency. During FY03, over 299 lessons learned have been electronically linked to technical standards. The results of this effort have afforded NASA programs and projects with greater utility and application, not only of the standards themselves, but of potentially key lessons learned from past programs and are now being passed on and utilized in a new generation of flight and ground hardware and software. An innovative electronic tool has been developed to assist in the linking of this critical information. The tool correlates keywords to develop relevancy rankings, resulting in a reduction of time taken to determine that a relationship exists between the technical standard and the lessons learned. In addition, 137 Application Notes have been identified to document individual experiences gained from the Agency's application of specific technical standards.

A sampling survey on how technical standards are being used within NASA was conducted. The July-September 2003 results were that almost 29% were used for in-house research and development activities, approximately 23% were used to develop requirements for program and project development, and more than 18% were used for verification of a contractor's design and development processes on programs and projects.

10. Please provide any other comments:

# National Archives and Records Administration

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

0

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

16

| Voluntary Standard | Government Standard |
|---|---|
| IEEE Std. 1012-1998 IEEE Standard for Software Verification and Validation | NARA 805 Systems Development Lifecycle (SDLC) |
| IEEE Std. 1016-1998 IEEE Recommended Practice for Software Design Descriptions | NARA 805 Systems Development Lifecycle (SDLC) |
| IEEE Std. 1058-1998 IEEE Standard for Software Project Management Plans | NARA 805 Systems Development Lifecycle (SDLC) |
| IEEE Std. 1061-1998 IEEE Standard for a Software Quality Metrics Methodology | NARA 805 Systems Development Lifecycle (SDLC) |
| IEEE Std. 1062-1998 IEEE Recommended Practice for Software Acquisition | NARA 805 Systems Development Lifecycle (SDLC) |
| IEEE Std. 1220-1998 IEEE Standard for Application and Management of the Systems Engineering Process | NARA 805 Systems Development Lifecycle (SDLC) |
| IEEE Std. 1233 -1998 IEEE Guide for Developing System Requirements Specifications | NARA 805 Systems Development Lifecycle (SDLC) |
| IEEE Std. 1362-1998 IEEE Guide for Information Technology-System Definition - Concept of Operations - Document | NARA 805 Systems Development Lifecycle (SDLC) |
| IEEE Std. 2001-2002 IEEE Recommended Practice for the Internet – Web Site Engineering, Web Site Management, and Web Site Life Cycle | NARA 805 Systems Development Lifecycle (SDLC) |
| IEEE Std. 610.12 -1990 IEEE Standard Glossary of Software Engineering Terminology | NARA 805 Systems Development Lifecycle (SDLC) |

| | |
|---|---|
| IEEE Std. 730-1998 IEEE Standard for Software Quality Assurance Plans | NARA 805 Systems Development Lifecycle (SDLC) |
| IEEE Std. 828-1998 IEEE Standard for Software Configuration Management Plans | NARA 805 Systems Development Lifecycle (SDLC) |
| IEEE/EIA 12207.0-1996 Standard for Information Technology – Software life cycle processes | NARA 805 Systems Development Lifecycle (SDLC) |
| IEEE/EIA 12207.1-1997 Standard for Information Technology – Software life cycle processes-Implementation considerations (ISBN 0-7381-0429-9) | NARA 805 Systems Development Lifecycle (SDLC) |
| IEEE/EIA 12207.1-1997 Standard for Information Technology – Software life cycle processes-Life cycle data (ISBN 1-5593-7990-1) | NARA 805 Systems Development Lifecycle (SDLC) |
| IEEE/EIA J-Std-016-1995 Trial Use Standard for Information Technology Software Life Cycle Processes Software Development Acquirer-Supplier Agreement | NARA 805 Systems Development Lifecycle (SDLC) |

3. Please provide the number of voluntary consensus standards used during FY 2003?

52

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

13

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

10

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| American National Standards Institute | ANSI |
| Association for Information and Image Management | AIIM |
| Consultative Committee for Space Data Systems | CCSDS |
| Institute of Electrical and Electronic Engineers | IEEE |
| International Council on Archives | ICA |
| International Organization for Standardization | ISO |
| National Fire Protection Association | NFPA |

| | |
|---|---|
| National Information Standards Organization | NISO |
| Research Libraries Group | RLG |
| Society of American Archivists | SAA |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

NARA uses the transaction basis for counting standards. We adhere to this definition of use:

"Use" means incorporation of a standard in whole, in part, or by reference for procurement purposes, and the inclusion of a standard in whole, in part, or by reference in regulation(s).

Therefore, although we cite in this report all uses of voluntary consensus standards in lieu of government standards (the response to question 2 for FY 2003), the total number of standards reported in the response to question 3 are only those falling within the "use" definition above.

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

C

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

A

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

A

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

We believe the Circular is working effectively and have no recommendations for changes.

8 . Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

None

9. Please provide any examples or case studies of standards successes:

None

10. Please provide any other comments:

# National Science Foundation

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

0

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

0

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

3

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

7

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| Advisory Committee on Anarctic Names | ACAN |
| American Society for Testing and Materials | ASTM |
| Federal Geographic Data Committee | FGDC |
| Global Grid Forum | GGF |
| Interagency Committee on Standards Policies | ICSP |
| International Code Council Federal Advisory Committee | ICC FAC |
| United States Board on Geographic Names | USBGN |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

B

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

B

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

B

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

No

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

It's fine.

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

None

9. Please provide any examples or case studies of standards successes:

None

10. Please provide any other comments:

None

# Nuclear Regulatory Commission

1. Please provide the number of government unique standards used in lieu of voluntary standards during FY 2003?

0

2. Please provide the number of voluntary consensus standards substituted for government unique standards during FY 2003?

0

3. Please provide the number of voluntary consensus standards used during FY 2003?

117

4. Please provide the number of agency employees participating in voluntary consensus standards activities during FY 2003?

136

5. Please provide the number of voluntary consensus standards bodies in which your agency participated in during FY 2003?

15

| Voluntary Consensus Standards Body | Acronym |
|---|---|
| American Concrete Institute | ACI |
| American Institute of Steel Construction | AISC |
| American National Standards Institute | ANSI |
| American Nuclear Society | ANS |
| American Society for Nondestructive Testing | ASNT |
| American Society For Quality | ASQ |
| American Society for Testing and Materials | ASTM |
| American Society of Civil Engineers | ASCE |
| American Society of Mechanical Engineers | ASME |
| Health Physics Society | HPS |
| Institute of Electrical and Electronic Engineers | IEEE |
| Institute of Nuclear Materials Management | INMM |
| Instrumentation Society of America | ISA |
| National Council of Radiation Protection and Measurements | NCRPM |
| National Fire Protection Association | NFPA |

6. Please use this box to provide any additional comments on how your agency currently reports its use of voluntary consensus standards:

6-1. Does your agency report: (a) Only the first time use of standards; (b) Continued use of standards; (c) Both first-time and continued use of standards; or (d) Not applicable?

A

6-2. Does your agency report: (a) The total number of standards it uses; (b) Each instance where the agency uses (i.e. references) a standard; (c) Both the total number and each instance; or (d) Not applicable?

A

6-3. Does your agency report multiple editions of a single standard as one standard use or as multiple standards used: (a) Single; (b) Multiple; (c) Both; or (d) Not applicable?

A

6-4. Does your agency report standards that it uses for guidance purposes (as opposed compliance purposes): (a) Yes; (b) No? (Note: If not applicable please select No)

Yes

6-5. Does your agency report use of standards from non-ANSI accredited standards developers including industry consortia: (a) Yes; (b) No? (Note: If not applicable please select No)

No

7. Please provide an evaluation of the effectiveness of Circular A-119 policy and recommendations for any changes:

The NRC believes that the circular provides appropriate direction and encouragement for federal agencies to develop internal agency-wide guidelines. The circular also provides sufficient and reasonable flexibility for each agency to make an independent determination relative to participation on voluntary consensus standards bodies and use of developed standards.

8. Please provide any conformity assessment activities in which your agency was involved in FY 2003 as described in the Federal Register Vol. 65, No. 155, Thursday August 10, 2000 - Guidance on Federal Conformity Assessment Activities:

This question was not included in guidance provided by NIST in the October/November 2003 timeframe. Thus, the NRC has not collected any information relative to conformity assessment activities.

9. Please provide any examples or case studies of standards successes:

NRC staff are working closely with the ASME to develop guidance for risk-informing in-service inspection and testing activities at commercial nuclear power plants. The guidance is still under consideration, however, at this time.

10. Please provide any other comments:

I found this to be user-friendly and straight-forward. As previously mentioned, however, a few of the questions in this format were different from those transmitted by e-mail earlier in the year.