



March 7, 2011

Aerospace Industries Association/Strategic Standardization Forum for Aerospace

RESPONSE TO FEDERAL REGISTER REQUEST FOR INFORMATION

“Effectiveness of Federal Agency Participation in Standardization in Select Technology Sectors for National Science and Technology Council’s Sub-Committee on Standardization”, Docket No. 0909100442-0563-02

The Aerospace Industries Association (AIA) appreciates the opportunity to respond to the National Science and Technology Council’s Sub-Committee on Standards regarding their request for input concerning the effectiveness of Federal agencies’ participation in the development and implementation of standards and conformity assessment activities and programs. The aerospace industry’s long partnership with government agencies (both civil and military) for the development of standards is one of the key reasons for the US’s dominance in aerospace. Ensuring strong, responsive standards systems is critical to the success of aerospace products and programs. This response was developed by our Strategic Standardization Forum for Aerospace (SSFA) and represents the collective input of the many companies and standards developing organizations that constitute this large and nationally important industry sector.

The SSFA welcomes the opportunity to discuss these issues and others with the NSTC Sub-Committee on Standards or any government entity seeking input on policies or processes related to standards.

Effectiveness of the methods Federal agencies have used to engage in standards-setting activities

Whenever possible, the aerospace industry encourages government agencies to work with industry to set applicable standards to ensure that impacts to design and manufacturing, and operations are considered along with safety and health.

In instances where the government is the customer or where a government agency has regulatory responsibility for public health, safety, or the environment, the activities that seem to have been most successful were when the end performance or the acceptable limits were specified and then industry was allowed to work with government representatives in industry standards setting venues to determine the best way to meet the specified needs.

Effectiveness of Federal agencies coordination with the private sector

AIA is looking to the NSTC Sub-Committee to help with more consistent interpretation and policy implementation across Federal agencies relative to government participation in standards development. Conflicting agency policies on membership, inconsistent support of dues and travel costs, and the wide variability of guidelines related to the ability of federal employees to take on leadership roles with technical committees or even in the governance structure of standards organizations, leads to confusion and lost opportunity for the public sector to be an equal and effective partner in standards setting.

AIA strongly encourages the NSTC Sub-Committee to clarify, on a government-wide basis, policies that would help agency stakeholders to understand the rules of engagement. Inconsistent application of the tenants of the National Technology Transfer and Advancement Act (NTTAA) and its implementing instructions delays the timely development of standards relevant to the needs of federal agencies. Without competent government employees participation not only at the technical committee level, but at the standards governance level within standards setting organizations, private industry is unable to effectively partner with the public sector on critical standardization initiatives nor ensure that the standards systems meet the collective needs of both government and industry.

Adequacy and availability of Federal resources

The US aerospace industry depends on the strong infrastructure of standards setting that government agencies bring to the public-private partnership. Certainly one of the cornerstones of the superiority of the US's defense, space and civil programs is the existence of the Defense Standardization Program Office and the system of Military Specifications and Standards. AIA encourages the Department of Defense and other government agencies to continue to support the robust set of government technical standards that define our defense and space platforms and programs as these same technical standards are also the major source of data used for the private sector, e.g. civil aircraft, commercial space systems, etc. AIA also encourages the DoD and other government agencies to grow and expand their efforts to work together with industry in voluntary consensus standards setting venues whenever possible to develop the industry standards that define our defense and space platforms and programs.

At the same time, AIA encourages the NSTC Sub-Committee to help government agencies to recognize that the development and use of industry standards is not free. Just as the internal development and distribution of government standards is not without cost, participation in the development of industry standards and then the subsequent purchase of the standards requires resources. Federal agencies need to budget for the time and travel of government experts to participate in the setting of standards. They also need to budget to purchase the resulting standards. AIA would point out to the

NSTC Sub-Committee that managed correctly, participation with industry, pursuant to the NTTAA and OMB Circular A-119 directives, is a strategic investment in the standards which can ultimately control costs and improve quality and safety of government purchased products and services.

The aerospace industry would also encourage government support for more participation by technical experts from government in standards setting activities and earlier communication of standards needs. This would ensure that the public sector technical requirements are met in a timely manner and in close collaboration with the private sector. The aerospace industry would also like to encourage greater government support for the National Institute of Standards and Technology (NIST) in carrying out its assigned roles and responsibilities as expressed in the directives of the OMB Circular A-119.

Other issues that arise and are considered during the standards setting process which impact the process, and the timeliness, adoption and use of the resulting standards.

Federal agencies that maintain a standards office/function staffed by full-time standards professionals whose careers are independent of any single administration, are those which are best able to develop, nurture and maintain positive public-private partnerships as well as forge strong interagency standardization networks. It is difficult for the private sector to work with a Federal agency that does not have a standards office/function staffed by individuals with a strong understanding of the value of standards, codes, conformity assessment process and the standards systems used by US industry.

AIA would encourage the NSTC Sub-committee to work with the Standardization Executives to ensure that each agency develops and maintains a strong core office of professionals dedicated to helping coordinate standardization activities between agencies and with the private sectors. These government standards professionals should be encouraged to engage with and participate in standards setting organizations at the governance and policy level to help foster a stronger partnership.

Additionally, AIA would like to emphasize the connection between innovation and the protection of intellectual property rights contained in standards. The US Government should consider ways to ensure that standards organizations have IPR policies which meet the requirements established by OMB Circular A119. However, AIA would urge the US Government to avoid regulations or preferences directed at a particular IPR policy, noting that no single policy would be appropriate across all standards types and in every standardization instance.

Summary

Our nation's economy and national security rest on the strength of the aerospace industry and its products, which in turn owes its strength to the robustness and flexibility of the standards systems it uses. The ability to collaborate with government agencies to identify and develop the standards necessary to support this vital industry is integral to the continued success of US aerospace superiority. AIA and its members welcome the opportunity to continue to search for ways to improve this proven public-private standards partnership and to communicate and share requirements in standards setting venues in order to work together to respond to civil and defense priorities.

The aerospace industry not only welcomes, but requires, the participation of government experts in standards development activities and together we will continue to create standards that can be adopted and relied on by Federal agencies. AIA welcomes the opportunity to work with the NSTC Sub-Committee on Standards and with entities such as NIST and ANSI to continue to build upon the success of the NTTAA. We appreciate the opportunity to provide these comments and we look forward to being a part of the ongoing dialogue between members of the Sub-Committee and other key stakeholders from the standardization community.

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