

Although the request for comments primarily focuses on participation of federal agencies in standards setting, the American Association for Laboratory Accreditation (A2LA) offers its perspective on the conformity assessment aspect of the topic. A2LA is the largest internationally-recognized laboratory accreditation body in the United States and one of the leading accreditation bodies in the world. A2LA is a 501c3 non-profit organization headquartered in Frederick, Maryland.

Conformity assessment carried out by third-party private sector organizations is well established and recognized by several sectors and federal agencies. When there is a need to provide a formal assurance of the competence of conformity assessment bodies, accreditation by internationally recognized accreditation bodies should be the preferred means of assurance.

The infrastructure in the form of the multilateral mutual recognition arrangements (Arrangements) of the International Laboratory Accreditation Cooperation (ILAC)(www.ilac.org) and the International Accreditation Forum (IAF)(www.iaf.nu) are already in place for recognizing accreditation bodies so there is no reason for federal agencies to administer their own system, either to administer accreditation itself or a recognition program for accreditation bodies. ILAC is an international cooperation of laboratory and inspection accreditation bodies formed more than 30 years ago to help remove technical barriers to trade. The ILAC Arrangement (MRA) has been in place for 10 years. IAF is the world association of conformity assessment accreditation bodies and other bodies interested in certification in the fields of management systems, products, services, and personnel. The IAF Arrangement has been in place for 12 years. Both Arrangements are based upon results of rigorous, periodic peer evaluations to ensure accreditation bodies to capable of determining competence in their respective field of operation. Several federal agencies including the CPSC, EPA, DoD, and NRC already use the ILAC and representatives of those agencies participate in the ILAC Arrangement Committee.

If the government has special requirements for conformity assessment and accreditation, they should be considered in the standards development process or by ILAC and/or IAF as appropriate. This is the most cost effective means for federal agencies to participate in conformity assessment and accreditation activities rather than developing their own programs.

On a related matter, the NIST Guidance on Federal Conformity Assessment Activities published in August 2000 needs to be updated to include reference to ILAC and IAF. A proposed revision is attached as part of this set of comments.

Sincerely,

Peter Unger
A2LA President & CEO