

From: Patrick Davison <PDavison@mhi.org>
Sent: Monday, November 4, 2019 2:22 PM
To: PSA Department <PSA@ansi.org>
Subject: Public comment on ExSC_096_2019

Hello,

Thank you for inviting public comment on the proposed revisions. I have a comment on ExSC_096_2019 for consideration.

In one of my standards committees, a discussion came up regarding whether a standard could include language requiring that any conformance testing being conducted in accordance with an American National Standard be done at an “accredited laboratory.” In other words, the commenter wished to impose a condition in the standard upon the entity conducting an activity described within the standard. A response to the comment noted that in the event of a conformity assessment, certification, or performance claim, there would be obvious benefits from conducting tests and generating data from an accredited, third party laboratory, but that those requirements should not be included in the American National Standard. Instead, in the case of certification, the requirement ought to reside in a certification policies document drafted by the entity offering the certification. Other concerns were raised regarding issues such as safety, data quality, etc.

Inclusion of a requirement that testing be conducted by an “accredited laboratory” would restrict a manufacturer, research facility, educational institution, or any other entity lacking accreditation the ability to comply with the standard. It would also offer a requirement that would be onerous for the ASD to monitor.

The second paragraph of the draft 3.2.3 states:

3.2.3 Conformity Assessment, Testing and Training

It is permissible for health, safety or environmental protection reasons to include a generic requirement for third-party, *i.e.*, independent, conformity assessment, testing or training. ANS shall not dictate the use or non-use of a particular conformity-assessment body, testing facility or training organization.

Perhaps the second sentence could elaborate on attributes of the testing facility, as follows:

It is permissible for health, safety or environmental protection reasons to include a generic requirement for third-party, *i.e.*, independent, conformity assessment, testing or training. ANS shall not dictate the use or non-use of a particular conformity-assessment body, testing facility, testing facility accreditation or training organization.

Alternatively, the language could be condensed as follows:

It is permissible for health, safety or environmental protection reasons to include a generic requirement for third-party, *i.e.*, independent, conformity assessment, testing or training. ANS shall not dictate the use or non-use of a particular conformity-assessment body, testing facility, accreditation or training organization.

Thank you for your consideration.

Kind regards,

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