



National Cooperation for Laboratory Accreditation

1875 I Street, NW, Suite 500, Washington, DC 20006
(202) 887-5872 x107 • Fax: (202) 887-0021 • info@nacla.net
www.nacla.net

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*Reliable Results through
Recognized Accreditation*

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NACLA HEADQUARTERS OFFICE
ROBERT UTTENWEILER
NACLA Executive Officer
Washington, DC

Marlene H. Dortch
Office of the Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, DC 20554

Re: Federal Communications Commission Notice
of Proposed Rulemaking
ET Docket No. 13-44
RM-11652

*Amendment of Parts 0, 1, 2, and 15 of the Commission's Rules
regarding Authorization of Radiofrequency Equipment*

*Amendment of Part 68 regarding Approval of Terminal
Equipment by Telecommunications Certification Bodies*

Comments from the
National Cooperation for Laboratory Accreditation (NACLA)

Dear Secretary Dortch,

In 1998, the National Cooperation for Laboratory Accreditation (NACLA) was founded as an Internal Revenue Service 501 (c) (6) not-for-profit organization. NACLA was founded by representatives of public and private-sector organizations to provide coordination and focus for laboratory accreditation programs in the United States. NACLA is a stakeholder organization with its leadership body, the Board of Directors/Operations Council, being composed of balanced representation from the four key stakeholder groups: Industry, Government, Laboratories and Accreditation Bodies.

In Section 2.949 (b) (1), the Federal Communications Commission states, "Successful completion of an ISO/IEC 17011 peer review, such as being a signatory to the Federal Communications Commission FCC 13-19 International Laboratory Accreditation Cooperation (ILAC) Mutual Recognition Arrangement or other equivalent laboratory accreditation agreement." This wording seems to

indicate that ILAC is the only acceptable organization that operates a recognition program under ISO/IEC 17011 in the United States. The Commission should not and cannot create a monopoly position for ILAC within the Commission's rule when there are other bodies around the world and in the United States that operate such recognition programs. In fact, the peer review process used by ILAC raises significant antitrust concerns in the United States since competing accreditation bodies are, in fact, assessing their own competitors.

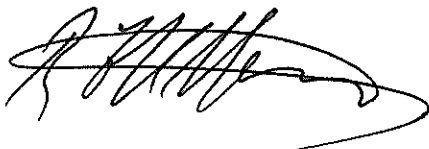
NACLA was founded in the United States because there are regulators and industry groups that believe that a higher standard is needed. NACLA is specified by, among others:

- Chrysler Motors
- Federal Aviation Administration
- Federal Communications Commission
- Fokker Aerostructures B.V.
- General Motors
- General Services Administration
- Goodrich
- Harlow Aerostructures, LLC
- Nadcap
- National Association of State Fire Marshals
- Smart Grid Interoperability Panel - IPRM Ver. 2, January 2012
- State of California
 - Department of Transportation
- US Coast Guard
- US Department of Transportation
 - Federal Highway Administration
- US Environmental Protection Agency
- US Navy.

We would point out that the third organization on this list is the Federal Communications Commission. This alone should add weight to the issue that creating a monopoly for ILAC is highly inappropriate.

However, this is not just about NACLA and ILAC. There are a number of organizations involved in the United States accreditation process. Therefore, we respectfully insist that the wording of Section 2.949 (b) (1) be changed to read: "Successful completion of any federally acceptable laboratory accreditation agreement."

Sincerely,



Robert Uttenweiler
Executive Officer
National Cooperation for Laboratory Accreditation