

**Memorandum**

Date October 16, 1996

From Quality Assurance Specialist, Certification and Quality Assurance Branch, DRDS

Subject Meeting with Mr. Dale Pfriem of International Certification Services (ICS), Inc.

To The Record:

A meeting was held on October 7, 1996, at the request of Mr. Pfriem. The purpose of the meeting was to further discuss third-party laboratory testing program discussed at the public meeting in June 1996.

Mr. Pfriem provided a copy of the Federal Communication Commission's (FCC) Federal Register Notice, FCC 96-208, in which the FCC has authorized under a Declaration of Conformity, the submission of test data by an ISO Guide 25 accredited laboratory by an FCC approved accreditation body. This is in lieu of the FCC conducting verification tests. Mr. Pfriem thought NIOSH could use this as an example for their program.

Mr. Pfriem queried NIOSH on the type of program the Institute had in mind. The Institute stated that all opinions are being considered but the program would most likely be one small in-scale initially and would be an accreditation program. Mr. Pfriem agreed with the approach and suggested that the pilot program start with the new Part 84 requirements for particulate filter respirators and that accreditation programs such as, the National Voluntary Laboratory Accreditation Program (NVLAP) and the American Association for Laboratory Accreditation (A2LA) would accommodate NIOSH's needs. Mr. Pfriem added that the program should include an appeal process for manufacturer's to dispute lab test reports and manufacturer's should be free to select an approved lab. However, he added that NIOSH should select the lab when conducting product audits, etc.

Mr. Pfriem was asked what he believed was a reasonable turn-around time on certifications that the manufacturer's would be satisfied with? He stated 6-8 weeks and he knew that the Canadian Standards Agency (CSA) and the Underwriters Laboratory (UL) maintained a 8 week turn-around. He stated that if the respirator was the primary product of the applicant they would be willing to pay \$5-6 K more to gain a 3-4 week faster turn-around time.

**R E C E I V E D**

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In closing Mr. Pfriem stated that he saw two primary reasons for NIOSH to go to third party lab testing: 1) To allow NIOSH to concentrate its' limited resources and focus its' mission on research and standards development to accommodate new technology. 2) To enable manufacturer's to get their product to the marketplace sooner to benefit the user in regards to advance protection on safety and health. The Institute thanked Mr. Pfriem for his comments.

  
Matt Bowyer

CC:  
Dale Pfriem