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Comment from Makkonen, Jarno; Private Citizen

This is a Comment on the **Occupational Safety and Health Administration (OSHA) Notice: Nationally Recognized Testing Laboratory Program Regulation; Revision of the Office of Management and Budget's (OMB) Approval of Information Collection (Paperwork) Requirements**

For related information, [Open Docket Folder](#) 

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Comment

I am not sure why OSHA undertakes to qualify NRTL's through survey and audit. Internationally, recognition of testing laboratories has been demonstrated through compliance and third party registration of testing and calibration programs to the IEC/ISO 17025:2005 standard. The Registrar companies provide publicly available lists of NRTL's. The Registrar companies are qualified and audited by a national level surveillance organization. Companies with calibration certification to ISO 17025:2005 are currently accepted for nuclear applications per the ASME Boiler & Pressure Vessel Code, Section III. Further, testing applications are currently being considered to be added.

In Summary, separate a separate audit and qualification program of NRTL's by OSHA under 29 CFR 1910.7 seems a significant duplication of work already undertaken by others.