



March 16, 2009

Peter Orszag
Director - Office of Management & Budget
Executive Office of the President
1650 Pennsylvania Avenue, NW,
Washington, DC 20503

RE: OMB, 74 Fed. Reg. 8819 - Request for Comments on Federal Regulatory Review

Dear Director Orszag:

Underwriters Laboratories Inc. (UL) appreciates the opportunity to comment on the Office of Management and Budget's (OMB) Request for Comments on federal regulatory review procedures, specifically the OMB A-119 Circular. As OMB considers recommendations to the President, we urge continued support for the OMB Circular A-119, as it provides an important tool for the coordination of standards domestically, and serves as a cost-effective mechanism for standardization in this country.

UL is an independent, not-for-profit standards developer and product certification organization dedicated to public safety. Since our founding in 1894, UL's engineers and staff have helped develop safety standards and product-testing protocols to mitigate the loss of life and property from noncompliant products in the United States and around the globe. With 115 years of experience, UL has developed more than 1000 Standards for Safety. Our Standards for Safety, a number of which have been adopted by various government agencies to ensure products comply with safety requirements, help advance public safety and confidence, reduce costs, and improve quality. Millions of products and their components are tested to UL's rigorous safety standards with the result that consumers live in a safer environment than they would have otherwise.

As was the intention with the enactment of the National Technology Transfer and Advancement Act of 1995, OMB A-119 directs Federal agencies to use consensus standards in lieu of government-unique technical requirements when possible, except where inconsistent with law or otherwise impractical. This support of developed consensus standards encourages the government work, wherever possible, in collaboration with industry and consumer stakeholders to meet shared objectives and reduce redundancy of efforts.

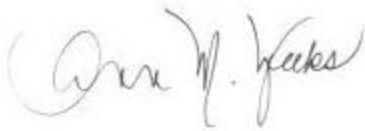
A good example of this in practice is the Occupational Safety and Health Administration's (OSHA) recognition of dozens of UL standards that form the baseline safety requirements for products used in the workplace. Rather than undertake its own technical activity, OSHA identified consensus standards through the regulatory process that would meet their needs for workplace safety. As a result, OSHA calls out specific UL product standards aimed at protecting construction workers from fall accidents and electrical workers from shock hazards.

When government agencies can rely on private sector consensus standards, then manufacturers can design products to meet a streamlined set of requirements regardless of application or jurisdiction. US manufacturers thus can find economies of scale in production, which also keeps prices low for consumers. At the same time, the requirements and confidence needs of regulators are met.

Under NTTAA, agencies are encouraged to adopt consensus standards, especially those developed by established bodies using open and consensus-based processes. Consensus standards developed through the American National Standards Institute processes minimize the cost to the government for developing its own standards, while still ensuring that standards are developed through participation of a broad array of stakeholders. As currently structured, the accredited standards development process requires balance, openness, and transparency, among other things. As a result, standards are developed by experts from many disciplines – consumers, manufacturers, government, etc. The process also allows for periodic review to ensure ongoing relevancy of requirements without having to rely on cumbersome government rulemaking processes.

Since its enactment, OMB A-119 has contributed significantly to reducing overlapping public- and private-sector standards and technical regulation activities and to streamline requirements. Both government and industry have been able to realize efficiencies that help manufacturers stay competitive and financially viable, while meeting regulators needs. For these reasons, among others, we ask for OMB's continued support of OMB A-119.

Sincerely,

A handwritten signature in cursive script, appearing to read "Ann M. Weeks". The ink is dark and the signature is centered below the "Sincerely," text.

Ann. M. Weeks
Vice President, Global Government Affairs