

August 29, 2016

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

Re: FCC Memorandum Opinion and Order and Order on Reconsideration 16-74

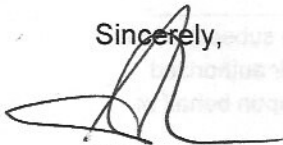
Dear Secretary Dortch:

The American Council of Independent Laboratories (ACIL), founded in 1937, is the trade association representing independent, commercial scientific and testing laboratories. Its members are professional services firms engaged in testing, product certification, consulting, and research and development. Affiliated membership is available to manufacturer's laboratories, consultants, and suppliers to the industry.

ACIL members have expressed a high level of concern and disappointment regarding the recent decision by the FCC outlined in Memorandum Opinion and Order and Order on Reconsideration 16-74, ET Docket 13-44, dated June 15, 2016 which extended the deadline for mandatory laboratory accreditation and discontinuation of the FCC Part 2.948 laboratory listing program to July 17, 2017. In a recent survey of our members regarding this issue, 100% of the surveys received indicated the belief that the FCC's decision to extend the deadline was detrimental to accredited U.S. Laboratories. Due to the deadline extension, U.S. accredited laboratories will continue to face competition from unaccredited labs in non-MRA countries. This puts accredited U.S. Laboratories at a competitive disadvantage and although this issue is not new, the deadline extension effectively maintains the status quo for another year allowing the problem to persist.

In summary, while ACIL appreciates the FCC's rulemaking efforts to require mandatory laboratory accreditation we want to strongly emphasize the negative impact and extension of the unfair competition situation that accredited U.S. Laboratories are facing as a result of the deadline extension.

Sincerely,



Milton M. Bush, J.D., CAE
Chief Executive Officer