Outlook

[Draft] 216-RICR-50-05-1: A2LA Comment

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To Garceau, Zachary (RIDOH) <Zachary.Garceau@health.ri.gov>

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Good afternoon,

My name is Tanner Spires, and I am on the government relations team at A2LA. We are an internationally recognized accreditation body that has been providing accreditation services for over 45 years. We appreciate the opportunity to respond to this proposed rulemaking. Our comment is addressing the inconsistency with the definition/requirements of some of the language dealing with accreditation and which programs are accepted.

Specifically, the proposed language on **p.445** under **proposed section 4a** says that "You can also use a filter certified by an American National Standards Institute accredited certifier to reduce lead in drinking water."

We encourage you to change this language to the following.

As written: "You can also use a filter certified by an American National Standards Institute accredited certifier to reduce lead in drinking water."

> **A2LA proposed: "You may also use a filter that is certified to reduce lead in drinking water by a certification body accredited to ISO/IEC 17065, where the accreditation body meets the requirements of ISO/IEC 17011.**

The main reason for our suggestion is because ANSI themselves do not provide accreditation, instead you should specify the accreditation and certification requirements you intend to rely on. I would also like to note that at the very least, this sections language should be consistent with the accreditation language used on **p.34** under section **1.5 Approval of Treatment Works, Storage and Pumping Facilities: A2.** Doing at least this would ensure that there is consistent application of the requirements and allowing for the certification of the filters to come from any qualified certification provider, not just one that is "ANSI certified".

We hope that you welcome our suggestions and please do not hesitate to reach out if you have any questions.

Kindly,

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