

AC10-0209-R1

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Certified Quality and
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ISO 9001 / ISO 14001
Reg. No. 12455-03

Michael Beaton
Vice-President – Whittier Operations
ICC Evaluation Services, Inc.
Los Angeles Business/Regional Office
5360 Workman Mill Road
Whittier, CA 90601

Subject: Proposed Revisions to the Acceptance Criteria for Quality Documentation
Subject AC10-0209-R1

Dear Mr. Beaton,

Hilti has reviewed the referenced AC10 proposed revision and believes it to be insufficient with respect to adding section 2.8. The proposed revision uses the terms, “in-house laboratory” and “quality control testing” without the benefit of providing proposed definitions for these terms in section 1.3 of the criteria. Without the inclusion of these definitions it is unclear what impact, if any, the proposed addition of section 2.8 will have on a manufacturer.

As examples,

Would a hardness inspection performed with a hardness tester meet the definition of a quality control test or would this be considered a quality control inspection and thus in the scope of the proposal?

Would a viscosity inspection performed as a part of the documented ongoing QC activities performed on a chemical product using a viscometer be considered a quality control inspection test or an inspection?

Would an inspection/test instrument located on the shop floor be viewed differently than a similar instrument that was located in a separate room that was called a laboratory?

With this in mind, Hilti believes that prior to the adoption of the proposed changes the public be afforded an opportunity to review the proposal with essential definitions provided. Therefore we would respectfully request that this proposal be sent back to staff at this time.

Best Regards,

A handwritten signature in black ink, appearing to read "Tom Horan".

Tom Horan
Hilti North America QA Manager