

WITH RESPECT TO THE PROPOSED RULE IN TERMS OF THE SUBSTANTIAL REDUCTION ON THE NUMBER OF DESIGNEES WE BELIEVED IT IS IN THE BEST INTEREST OF THE ADMINISTRATOR TO CONTROL THE NUMBER OF DESIGNEES USING THE CURRENT DESIGNEE POLICY. THAT IS BASING THE RENEWAL ON THE LEVEL OF ACTIVITY AND THE NECESSITY OF THE DER. WE BELIEVED THERE EXIST NO CONFLICT OF INTEREST BETWEEN DERS AND ODARS BUT TO THE CONTRARY THEIR ACTIVITIES, LEVEL OF EXPERTISE AND GUIDANCE SHOULD BE CONSISTENT. MANY CERTIFICATION ACTIVITIES ARE NOT COVERED UNDER THE AUTHORITY OF ODAR AND THUS STILL REQUIRE DER SUPPORT. PLEASE CONSIDER THIS POINT CAREFULLY.