

January 15, 2015

Henry Wixon  
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National Institute of Standards and Technology  
100 Bureau Drive, Stop 1052  
Gaithersburg, MD 20899-1052

*Via email: [henry.wixon@ntis.gov](mailto:henry.wixon@ntis.gov)*

**Re: Request for Extension of Time to File Comments on Proposed Rule to Establish Certification Program for Access to the Death Master File, 15 C.F.R. Part 1110**

Dear Mr. Wixon:

The undersigned organizations respectfully request that the National Technical Information Service (NTIS) extend the deadline for filing comments on the proposed rule published at 79 Fed. Reg. 78314 (December 30, 2014), which would establish a certification program for access to the Death Master File (“DMF”) and replace the current Interim Final Rule. Specifically, we request a 60-day extension from January 29, 2015 to March 30, 2015.

The additional time would permit the undersigned organizations to understand and evaluate more thoroughly the likely effects of the proposed rule. The proposed rule would introduce significant changes to the interim final rule while also establishing new requirements, including an additional requirement for submission of a written attestation from an independent, recognized accreditation body. More time is required to explore the implications of this proposal. In addition, NTIS poses a number of questions throughout its request for comment. We believe that the requested extension will enable us to provide NTIS with more meaningful feedback, which will be valuable to everyone involved in this process.

Thank you in advance for your consideration of this request. The undersigned organizations share NTIS’ desire to establish a certification program that is beneficial to all stakeholders. We look forward to continuing to work with NTIS on this important issue. If you have any questions regarding our request, please contact Ariel Wolf, of Venable LLP, at 202.344.4464, or [AWolf@Venable.com](mailto:AWolf@Venable.com).

Sincerely,

**American Bankers Association  
American Council of Life Insurers  
Consumer Bankers Association  
Consumer Data Industry Association  
DBA International  
Direct Marketing Association  
Property Casualty Insurers Association of America  
Software and Information Industry Association  
U.S. Chamber of Commerce**

Cc: Bruce Borzino, Director, National Technical Information Service  
Jasmeet Seehra, Office of Management and Budget