

Volume 3 RESPONSES TO COMMENTS 20 December 2007

**Comment Number 64**

First Name Carl Last Name Kircher

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section Section 1.1

Comment w/Rationale for Change Section 1.1: Because of how the Environmental Sector is titled, in the first sentence the phrase "analytical testing laboratories" should be changed to "environmental testing laboratories."

Proposed Change Section 1.1: Because of how the Environmental Sector is titled, in the first sentence the phrase "analytical testing laboratories" should be changed to "environmental testing laboratories."

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vote Yes + Comments

email carl\_kircher@doh.state.fl.us

Phone Number 904-791-1574

Date 7/3/2007

[Details](#)

Response: Persuasive. This section has been changed to read "environmental testing laboratory".

**Comment Number 65**

First Name Carl Last Name Kircher

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section Section 3.4

Comment w/Rationale for Change Section 3.4: The Committee recommends deletion of the definition for "Primary Accreditation Body (AB)" since no references or wordings to this term could be found elsewhere in this volume.

(Uniformity of Standards Committee)

Proposed Change Section 3.4: The Committee recommends deletion of the definition for "Primary Accreditation Body (AB)" since no references or wordings to this term could be found elsewhere in this volume.

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vote Yes + Comments

email carl\_kircher@doh.state.fl.us

Phone Number 904-791-1574

Date 7/3/2007

[Details](#)

Response: Non-Persuasive. "Primary Accreditation Body" is used in section 11.2.3 (f). Since the term is used in the document, the definition will be maintained.

**Comment Number 66**

First Name Carl Last Name Kircher

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section Section 3.7

Comment w/Rationale for Change Section 3.7: In the definition of proficiency testing provider, the definition uses an acronym (PTPA "proficiency testing provider accreditor) that had not been used in the standard to that point. This full term rather than the acronym should be used in this definition.

Proposed Change Section 3.7: In the definition of proficiency testing provider, the definition uses an acronym (PTPA "proficiency testing provider accreditor) that had not been used in the standard to that point. This full term rather than the acronym should be used in this definition.

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vote Yes + Comments

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Date 7/3/2007

[Details](#)

Response: Persuasive. The entire term will be used.

**Comment Number 67**

First Name Carl Last Name Kircher

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section Section 3.8

Comment w/Rationale for Change Section 3.8: The Committee recommends that the PTPA be defined as "an organization that is evaluated by the TNI PT Board and approved by the TNI NELAP Board to accredit PTPs." The Committee also recommends that the PT Committee consider formulating a definition for the "NELAP Board."

(Uniformity of Standards Committee)

Proposed Change Section 3.8: The Committee recommends that the PTPA be defined as "an organization that is

evaluated by the TNI PT Board and approved by the TNI NELAP Board to accredit PTPs." The Committee also recommends that the PT Committee consider formulating a definition for the "NELAP Board."

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vote Yes + Comments

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Date 7/3/2007

[Details](#)

Response: Persuasive. The definition will be changed, but will just identify TNI, not any specific board, as this is a policy issues for TNI.

Comment Number 68

First Name Carl Last Name Kircher

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section Section 3.10

Comment w/Rationale for Change Section 3.10: The definition of proficiency testing sample does not include a concluding acronym such as "PT Sample." The other definitions include an acronym such as PT study after the term is stated (e.g., Proficiency Testing Study (PT study)). This is not done for this definition, but the acronym PT sample is used later in the standard. The acronym should be added at the end of the term in the definition.

Proposed Change Section 3.10: The definition of proficiency testing sample does not include a concluding acronym such as "PT Sample." The other definitions include an acronym such as PT study after the term is stated (e.g., Proficiency Testing Study (PT study)). This is not done for this definition, but the acronym PT sample is used later in the standard. The acronym should be added at the end of the term in the definition.

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vote Yes + Comments

email carl\_kircher@doh.state.fl.us

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Date 7/3/2007

[Details](#)

Response: Persuasive. The acronym has been added.

Comment Number 69

First Name Carl Last Name Kircher

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section Section 3.14

Comment w/Rationale for Change Section 3.14: The Committee recommends deletion of the definition for "Secondary Accreditation Body" since no references or wordings for this term could be found elsewhere in this volume.

(Uniformity of Standards Committee)

Proposed Change Section 3.14: The Committee recommends deletion of the definition for "Secondary Accreditation Body" since no references or wordings for this term could be found elsewhere in this volume.

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vote Yes + Comments

email carl\_kircher@doh.state.fl.us

Phone Number 904-791-1574

Date 7/3/2007

[Details](#)

Response: Persuasive. This definition has been dropped.

Comment Number 70

First Name Carl Last Name Kircher

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section Sections 4.1 & 4.3

Comment w/Rationale for Change Sections 4.1 & 4.3: The Committee recommend omitting the words "PT Board" so that the appropriate phrase is worded as "TNI-approved PTPA." There are other sections of Volume 3 and Volume 4 where the wording is also "TNI-approved PTPA."

(Uniformity of Standards Committee)

Proposed Change Sections 4.1 & 4.3: The Committee recommend omitting the words "PT Board" so that the appropriate phrase is worded as "TNI-approved PTPA." There are other sections of Volume 3 and Volume 4 where the wording is also "TNI-approved PTPA."

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vote Yes + Comments

email carl\_kircher@doh.state.fl.us

Date 7/3/2007

[Details](#)

Response: Persuasive. The definition has been changed.

**Comment Number 71**

First Name Carl Last Name Kircher

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section Sections 6.3.3(a),(b),(c)

Comment w/Rationale for Change Sections 6.3.3(a), (b), (c): The Committee recommends the word "shall" instead of "must" in these sections.

(Uniformity of Standards Committee)

Proposed Change Sections 6.3.3(a), (b), (c): The Committee recommends the word "shall" instead of "must" in these sections.

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vote Yes + Comments

email carl\_kircher@doh.state.fl.us

Phone Number 904-791-1574

Date 7/3/2007

[Details](#)

Response: Persuasive. "Must" has been changed to "shall".

**Comment Number 72**

First Name Carl Last Name Kircher

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section Section 9.0(d)

Comment w/Rationale for Change Section 9.0(d): The Committee recommends that the language in this section be revised to read "...after the data have been reported. . ."

(Uniformity of Standards Committee)

Proposed Change Section 9.0(d): The Committee recommends that the language in this section be revised to read "...after the data have been reported. . ."

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vote Yes + Comments

email carl\_kircher@doh.state.fl.us

Phone Number 904-791-1574

Date 7/3/2007

[Details](#)

Response: Persuasive. This change has been made.

**Comment Number 73**

First Name Carl Last Name Kircher

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section the whole Volume

Comment w/Rationale for Change General Comment: The Committee notes that international organizations are adopting the new international standard ISO 17043 for proficiency testing. This Committee thus strongly recommends that the PT Committee consider the impact of ISO 17043 on Volume 3 to determine any impacts on copyright infringement and consistency of its Draft Interim Standard with proposed ISO 17043 language.

(Uniformity of Standards Committee)

Proposed Change General Comment: The Committee notes that international organizations are adopting the new international standard ISO 17043 for proficiency testing. This Committee thus strongly recommends that the PT Committee consider the impact of ISO 17043 on Volume 3 to determine any impacts on copyright infringement and consistency of its Draft Interim Standard with proposed ISO 17043 language.

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vote Yes + Comments

email carl\_kircher@doh.state.fl.us

Phone Number 904-791-1574

Date 7/3/2007

[Details](#)

Response: Non-Persuasive. ISO 17043 is still under development and, therefore, should not be referenced in this volume. It is believed that the volume currently includes the appropriate references to international standards.

**Comment Number 180**

First Name Thomas Last Name Coyner

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section 1.1

Comment w/Rationale for Change I have several comments on the Standard. These comment are being supplemented by written comments to TNI and copied to the PT Committee.

The Note under 1.1 is inappropriate and specifies the requires of the TNI PT Board - interestingly as authorized by the TNI PT Board- the Volume should be limited to requirements for the PT Providers as titled.

Also, in international usage notes are not part of a Standard and therefore all of the items in a) through e) have no standing and are thus not requirements for either the PT Board nor the providers.

Various sections of this Volume of the Standard attempt to provide both rights and duties of the TNI PT Board whereas Section 3.18 clearly says that the TNI Board duties are defined in it charter. The policies, procedures, and decisions of the TNI PT Board are not subject to consensus review and the PT Board does not operate within the ANSI approved consensus procedures. Therefore, inclusion of this body in the Standard must be seen as an attempt to justify a non-consensus means of operation within a consensus standard which is inappropriate.

Proposed Change Complete suggested resolutions are presented in detail in written comments as noted above.

Delete the Note in Section1.1

Remove all TNI PT Board duties, right and responsibilities from this Volume.

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vote No + Comments

email t.coyner@apgqa.com

Phone Number 740-423-4200

Date 7/24/2007

[Details](#)

Response: Persuasive. This note has been removed from Volume 3.

Comment Number 202

First Name Stephen Last Name Arms

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section 3.12

Comment w/Rationale for Change The definition for PT Study Opening Date may unintentionally preclude a laboratory from joining a study after it is "first made available," which becomes important when a "regular" study is being used for corrective action, and the lab needs to comply with the 15-day separation requirement. For clarity and consistency with V3, 8.4.4, "There shall be at least fifteen calendar days after the closing date of one study and the shipment date of the next study, whether supplemental or regularly scheduled, for the same field of proficiency testing for a given laboratory," additional language is needed.

Proposed Change Add to 3.12: For the purposes of calculating the required fifteen-day separation between closing date and opening date of successive studies, Opening Date shall mean the date that the PT Provider ships the study, whether supplemental or regularly scheduled, to the laboratory.

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vote Yes + Comments

email steve\_arms@doh.state.fl.us

Phone Number 9047911502

Date 7/25/2007

[Details](#)

Response: Not Applicable. The language has been modified, in Volume 1, to require 15 days between analysis dates as opposed to using shipment and closing dates. There is no longer a reference to the time between studies in Volume 3 as it is not a PT Provider requirement.

Comment Number 364

First Name Wade Last Name DeLong

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section 4.4.1

Comment w/Rationale for Change Section 4.4.1 This is another "blank check" for the PTPA to establish any format and frequency without review or agreement by the members of TNI as to the appropriateness of the imposed requirements. This is again totally inappropriate and well outside the authority of TNI to authorize. If data is to be submitted to the PTPA it must be covered under a confidentiality agreement, must be clearly define in a consensus process, and must be limited to the actual data required by the PTPA to meet clearly defined consensus develop ed requirements. This Standard does not provide these limitations and protections.

Proposed Change Suggested resolution: This section must be deleted until such time that the requirements for data are defined through a consensus process and the data can be properly protected by confidentiality agreements.

vote No + Comments  
email w.delong@apgqa.com  
Phone Number 740-423-4200  
Date 7/31/2007

[Details](#)

Response: Non-Persuasive. The exact information that will be included in the submittals has not yet been determined and may need to be fine tuned during some period after data collection begins. The PT Providers will be able to work with the PTPA(s) and the TNI PT Board to resolve any concerns that may arise over the specific data being requested.

**Comment Number 370**

First Name Mike Last Name Haller

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section 6.1.b

Comment w/Rationale for Change There is no definition of "equivalent challenge" and no generally accepted technical means to verify "equivalent challenge". Therefore, this requirement cannot be met as written.

Proposed Change Delete section or provide technically valid criteria.

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vote No + Comments

email m.haller@apgqa.com

Phone Number 740-423-4200

Date 7/31/2007

[Details](#)

Response: Non-Persuasive. There are certain aspects that must be left to the expertise of the PTPA(s).

**Comment Number 371**

First Name Mike Last Name Haller

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section 6.1.c

Comment w/Rationale for Change There, of course, no "historic norms" for pass/fail and this term is no defined. As noted elsewhere in the comments, the pass/fail rate of any provider is unique and determined by sample design, homogeneity, stability, and most importantly lab population. There is no evidence that this criteria could be met.

Proposed Change Delete requirement or provide technically valid criteria.

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vote No + Comments

email m.haller@apgqa.com

Phone Number 740-423-4200

Date 7/31/2007

[Details](#)

Response: Non Persuasive. This requirement allows the PTPA(s) to evaluate the fairness and consistency of the PT program once they begin collecting data. After data has been collected and reviewed for some period of time, the committee may be able to provide greater definition to the requirement but, in the meantime, the PTPA(s) will have the ability to address obvious problems.

**Comment Number 372**

First Name Mike Last Name Haller

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section 6.2.1

Comment w/Rationale for Change What is "well-characterized" there is not definition. Similarly, section 6.2.1 requires that the matrix be as natural as possible. Sand is a natural matrix. What is the technical justification for the 90%?

What technical evidence exists to support this apparently arbitrary requirement?

Proposed Change Remove requirement or sight references to appropriate matrices.

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vote No + Comments

email m.haller@apgqa.com

Phone Number 740-423-4200

Date 7/31/2007

[Details](#)

Response: Non-Persuasive. The requirement for "well characterized" has been in the standard since its inception and has not caused problems. The PTPA will have to use their expertise to make determinations relative to this point. The justification for no more than 90% sand is to ensure that a provider does not use a sample that is effectively all sand which, while "natural" has a much higher extraction efficiency for most analyses than does a soil that contains some silt and clay.

**Comment Number 373**

First Name Mike Last Name Haller

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

**Section 7.1.9**

**Comment w/Rationale for Change** Many of the solid matrix analytes have acceptance limits that are based upon study data (i.e. Mean $\pm$ 3SD), for these analytes what is the expected mean? Also many of the solid sample methods are highly biased, how should the expected mean be calculated?

**Proposed Change** Clarify exact technical requirements or allow exception where limits cannot be calculated.

**Uploaded Document**

vote No + Comments

email [m.haller@apgqa.com](mailto:m.haller@apgqa.com)

Phone Number 740-423-4200

Date 7/31/2007

[Details](#)

Response: Non-Persuasive. This language has been in the standard since its inception and has not caused problems. The PTPA will have to use their expertise to make determinations relative to this point.

**Comment Number 402**

**First Name** James **Last Name** Broderick

**Section Number** Item 9 **VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS**

**Section 7.1.8**

**Comment w/Rationale for Change** Unbiased methods for analytes with fixed acceptance limits of 10%, such as some drinking water analytes, the verification method must deliver recoveries consistently within 3.3% of assigned value to accommodate the 1/3 limits rule. For this example, in terms of SD, 3.3% is less the one SD(5%) because fixed limits are given as 2SD limits in drinking water. The analytical verification methods always have greater uncertainty than the gravimetric preparation of the sample. Therefore, the real use of the analytical verification is to check for production blunders. So for this purpose, I am proposing that the committee use the existing NELAC language that allows the verification limits to be set to 1.5 predicted SD. For the example above, the verification limits become 7.5% instead of 3.3%.

**Proposed Change** The assigned value of the analyte is verified if the mean of the provider's verification analyses is within 1.5 predicted standard deviations, as calculated per section 10.2.

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vote No + Comments

email [jdb10@health.state.ny.us](mailto:jdb10@health.state.ny.us)

Phone Number 518-573-7548

Date 8/1/2007

[Details](#)

Response: Non-Persuasive. This language has been in the standard since its inception and has not caused problems. As laboratories ability to conduct business is based on the evaluations of their PT samples, it is important that Verification, Homogeneity and Stability (VHS) testing do more than check for production blunders. PT Providers should be testing PT samples to as tight of limits as possible. There are no other comments from PT Providers expressing that the current limits are unobtainable.

**Comment Number 403**

**First Name** James **Last Name** Broderick

**Section Number** Item 9 **VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS**

**Section 7.1.6**

**Comment w/Rationale for Change** It is not appropriate to compare the RSD of the method with the 1/6 predicted limits which is usually one SD for NW studies, and only 2/3 SD for potable water studies. RSD should only be compared with another RSD.

**Proposed Change** The method used by the PT Provider for verification analysis shall have a relative standard deviation of not more the 50% of the relative standard deviation predicted at the assigned value by the laboratory acceptance criteria.

**Uploaded Document**

vote No + Comments

email [jdb10@health.state.ny.us](mailto:jdb10@health.state.ny.us)

Phone Number 518-573-7548

Date 8/1/2007

[Details](#)

Response: Non-Persuasive. The objective is to ensure that the providers' methods are capable of seeing problems that could affect participant laboratory evaluations. By using 1/6, the standard is being consistent between various study types. By using 50% of one Standard Deviation, the standard would be providing greater assurance for Water Pollution (WP) and Solid and Chemical Method (SCM) studies than for Water Supply (WS) studies.

**Comment Number 404**

**First Name** James **Last Name** Broderick

**Section Number** Item 9 **VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS**

**Section 4.5**

**Comment w/Rationale for Change** The submission of PT samples to PT Providers is not discussed in V4, and should not

be discussed here. It is my understanding that nobody is planning on sending PT samples to PT Providers. Personally I think it is a bad idea anyway (and a waste of energy). PT providers are allowed to utilize non-standard methods, so how do you compare PT data produced? Further, this would be a small dataset of suppliers anyway - statistics on small datasets are not overly useful.

Proposed Change Eliminate requirement (or possibility) of submission of PT samples to PT Providers.

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vote No + Comments

email [jdb10@health.state.ny.us](mailto:jdb10@health.state.ny.us)

Phone Number 518-573-7548

Date 8/1/2007

[Details](#)

Response: Persuasive. There have been various negative comments over the years concerning this section and the committee does not believe there is value in the proficiency testing of PT Providers. This section has been removed.

**Comment Number 407**

First Name James Last Name Broderick

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section 10.3.1.2

Comment w/Rationale for Change If I read this correctly, a PT could be produced with a TV of 20 and a lower acceptance level of 16. The lab could report <17 and be given an "acceptable" score. That doesn't seem right.

Proposed Change Remove 10.3.1.2

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vote No + Comments

email [jdb10@health.state.ny.us](mailto:jdb10@health.state.ny.us)

Phone Number 518-573-7548

Date 8/1/2007

[Details](#)

Response: Non-Persuasive. The committee has implemented this approach to meet the needs of those laboratories with higher (industrial-type) detection limits. This has been discussed with some state ABs who have expressed support. ABs would bear some additional responsibility to review PT results for appropriate use of reporting limits.

**Comment Number 409**

First Name James Last Name Broderick

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section 10.3.1.1

Comment w/Rationale for Change "any less than or zero" should not be evaluated as "acceptable". Instead, "any less than the PTRL or zero result" should be acceptable. A lab can't just report <5000 for everything and pass all of the unspiked analytes in a PT sample.

Proposed Change "If an assigned value is <PTRL, any less than the PTRL or zero result shall be evaluated as "acceptable"."

Uploaded Document

vote No + Comments

email [jdb10@health.state.ny.us](mailto:jdb10@health.state.ny.us)

Phone Number 518-573-7548

Date 8/1/2007

[Details](#)

Response: Non-Persuasive. The PTRLs are not intended to define laboratory reporting limits. There will be some burden placed on ABs to review PT results to ensure appropriate use of reporting limits by laboratories.

**Comment Number 429**

First Name Kenneth Last Name Jackson

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section 4.5

Comment w/Rationale for Change I believe this is a carry-over from NIST, who didn't do it anyway (or maybe just once, and we got no feedback on how we did). Wearing my PT-provider hat, I do not see how it adds to the quality of the product. Anyway, saying "as required by the PTPA" allows the PTPA not to do it!

Proposed Change Remove

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vote Yes + Comments

email [jackson@wadsworth.org](mailto:jackson@wadsworth.org)

Phone Number 518-485-5570

Date 8/1/2007

[Details](#)

Response: Persuasive. There have been various negative comments over the years concerning this section and the committee does not believe there is value in the proficiency testing of PT Providers. This section has been removed.

**Comment Number 497**

**First Name Gary Last Name Ward**

**Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS**

**Section 10.3.1.2**

**Comment w/Rationale for Change As written, any reported value will be acceptable as long as the "less than x" is greater than the lower limit. Therefore, reporting <10,000 on everything would be acceptable.**

**Proposed Change Maybe, "x must be less than the upper acceptance limit".**

**Uploaded Document**

**vote Yes + Comments**

**email gward@caslab.com**

**Phone Number 360-501-3371**

**Date 8/3/2007**

**[Details](#)**

Response: Non-Persuasive. The committee has implemented this approach to meet the needs of those laboratories with higher (industrial-type) detection limits. This has been discussed with some state ABs who have expressed support for this approach. ABs would bear some additional responsibility to review PT results for appropriate use of reporting limits.

**Comment Number 561**

**First Name Chuck Last Name Wibby**

**Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS**

**Section 6.3.1**

**Comment w/Rationale for Change V3 Section 6.3.1**

**We Concur with the comments submitted by Tom Coyner of APG regarding this section, "Section 6.3.1 This is another of the "blank check" requirements. The PT Committee is giving the PTB unlimited control over the criteria that the PTPs must meet without review by TNI members or participation in the consensus development process. This is absolutely inappropriate and inconsistent with the consensus develop process."**

**Proposed Change This section should be deleted until such time as the PT Board becomes a true consensus group with written protocols for developing any criteria that impact the PT program.**

**Uploaded Document**

**vote No + Comments**

**email cwibby@wibby.com**

**Phone Number 303-940-0033**

**Date 8/3/2007**

**[Details](#)**

Response: Non-Persuasive but will provide clarification. This section refers to the requirements in the FoPT tables, so the section will be revised to state this. This requirement has always been in place and has not resulted in any reported problems. The makeup of the TNI PT Board is not to be determined by the TNI PT Committee.

**Comment Number 562**

**First Name Chuck Last Name Wibby**

**Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS**

**Section 6.3.2**

**Comment w/Rationale for Change V3 Section 6.3.2**

**We Concur with the comments submitted by Tom Coyner of APG regarding this section.**

**Proposed Change We Concur with the recommended change submitted by Tom Coyner of APG regarding this section**

**Uploaded Document**

**vote No + Comments**

**email cwibby@wibby.com**

**Phone Number 303-940-0033**

**Date 8/3/2007**

**[Details](#)**

Response: Non-Persuasive. There may be minor changes to the FoPTs that can and should be implemented in a time period shorter than 6 months. TNI has established the TNI PT Board to implement the PT program and it is not up to the TNI PT Committee to determine its make up or process of making decisions.

**Comment Number 563**

**First Name Chuck Last Name Wibby**

**Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS**

**Section 8.2.2 b**

**Comment w/Rationale for Change We Concur with the comments submitted by Tom Coyner of APG regarding this section.**

**Proposed Change We Concur with the recommended change submitted by Tom Coyner of APG regarding this section.**

**Uploaded Document**

email [cwibby@wibby.com](mailto:cwibby@wibby.com)  
Phone Number 303-940-0033  
Date 8/3/2007

[Details](#)

Response: Non-Persuasive. The committee feels that TNI should have this authority, through the PTPA, in order to keep PT Providers from encouraging laboratories to analyze QC samples in a manner that could result in a finding from their accrediting body.

**Comment Number 565**

First Name Chuck Last Name Wibby

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section 10.1.2

Comment w/Rationale for Change We Concur with the comments submitted by Tom Coyner of APG regarding this section.

Proposed Change We Concur with the recommendation submitted by Tom Coyner of APG regarding this section.

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vote No + Comments

email [cwibby@wibby.com](mailto:cwibby@wibby.com)

Phone Number 303-940-0033

Date 8/3/2007

[Details](#)

Response: Non-Persuasive. This section is not in conflict with the FoPTs. It provides an option for separating out multimodal data only if the FoPT indicates that the data are to be evaluated using robust statistics.

**Comment Number 567**

First Name Chuck Last Name Wibby

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section 10.2.2

Comment w/Rationale for Change V3 Section 10.2.2

It is totally inappropriate for criteria developed by the TNI PT Board to supersede criteria developed by the PT Committee.

Proposed Change Delete this section entirely.

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vote No + Comments

email [cwibby@wibby.com](mailto:cwibby@wibby.com)

Phone Number 303-940-0033

Date 8/3/2007

[Details](#)

Response: Non-Persuasive. The Committee understands that it may not have accommodated for all future additions to the PT program (i.e. whole effluent toxicity, DMR-QA, etc.), so it has allowed flexibility for the TNI PT Board to make modifications as necessary.

**Comment Number 569**

First Name Chuck Last Name Wibby

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section 10.2.5

Comment w/Rationale for Change We Concur with the comments submitted by Tom Coyner of APG regarding this section.

Proposed Change We Concur with the recommendation submitted by Tom Coyner of APG regarding this section.

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vote No + Comments

email [cwibby@wibby.com](mailto:cwibby@wibby.com)

Phone Number 303-940-0033

Date 8/3/2007

[Details](#)

Response: Non-Persuasive. Dr. Kafadar's article shows that the biweight procedure breaks down at sample sizes <20. Discussions with Dan Tholen and another statistician supported that it is not inappropriate to use biweight statistics on larger data sets.

**Comment Number 572**

First Name Chuck Last Name Wibby

Section Number Item 9 VOLUME 3: PROFICIENCY TESTING PROVIDER REQUIREMENTS

Section 10.3.1.2

Comment w/Rationale for Change V3 10.3.1.2

**Following the language of this section a laboratory that reports <100% for every analyte present in a PT standard would receive an evaluation of "Acceptable".**

**Proposed Change We have not submitted a proposed change for this section because we do not understand the purpose of the language.**

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**vote No + Comments**

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**Date 8/3/2007**

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Response: Non-Persuasive. The committee has implemented this approach to meet the needs of those laboratories with higher (industrial-type) detection limits. This has been discussed with some state ABs who have expressed support. ABs would bear some additional responsibility to review PT results for appropriate use of reporting limits.