
From: Vokes.Kathleen@epamail.epa.gov
Sent: Wednesday, April 28, 2010 12:10 PM
To: Jim McGee - AdmarkIntl
Cc: ENERGYSTARVerificationProgram@energystar.gov
Subject: Re: EPA/DOE Enhanced Testing and Verification

Hi Jim - please send comments to ENERGY

STARVerificationProgram@energystar.gov. I have already forwarded your comments below through this email, but please feel free to share other comments. Also, please note that we are still developing specific requirements around challenge testing and appreciate your input.

Kathleen G. Vokes
ENERGY STAR Program
U.S. Environmental Protection Agency
Phone: 202-343-9019

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| Jim McGee - AdmarkIntl <JMcGee@AdmarkIntl.com>
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| Kathleen Vokes/DC/USEPA/US@EPA
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| Jim McGee - AdmarkIntl <JMcGee@AdmarkIntl.com>
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I am chair of the Government Affairs Committee for the Reflective Roof Coating Institute (RRCI), www.therrci.org.

If our organization wanted to comment about the proposed new “Enhanced Testing and Verification” of Energy Star products, what is the procedure?

RRCI would like to get clarification on challenge testing. This section could lead to endless loops of challenges by competitors. In order to perhaps prevent abuse, challenger should pay the entire test cost of testing, if the challenges are proved wrong.

In the case of roof coatings...what would be the criteria to allow use of “in-house” testing?

Producers of roof coatings have a vast number of raw materials from which to choose. Changes in raw materials that do not change performance are acceptable to remain “labeled” without new testing. Correct? (Page 33)

Thanks

Have a good day....

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