

From: [Pat McCullen](#)
To: ENERGYSTARVerificationProgram@energystar.gov;
cc: [Chuck Ramani](#); [Raj Nathan](#); [Hershal Brewer](#);
Subject: Draft Conditions and Criteria for Recognition of Accreditation Bodies for ENERGY STAR Laboratory Accreditation
Date: Monday, May 17, 2010 7:06:00 PM

Dear Kathleen:

This pertains to EPA's draft document entitled Conditions and Criteria for Recognition of Accreditation Bodies for ENERGY STAR Laboratory Accreditation. We have reviewed the draft and agree to the requirements contained in the draft document. It is our understanding that you are requesting comments only on the draft document at this time and that documentation from accreditation bodies desiring to participate in the ENERGY STAR program requested in the draft document is to be submitted to EPA at a later date.

We would also like to provide to EPA our comments on the draft which are based on review by our staff and input from the IAS Technical Advisory Council on Laboratories which met last week. Our comments are outlined in the bullet points below:

Reporting to EPA

- Clarification from EPA should be provided whether previous copies of evaluation reports of accreditation bodies by ILAC and its regional bodies (APLAC, IAAC, etc.) are needed prior to acceptance into the ENERGY STAR program.
- As regards participation in meetings with EPA (which we already do for the EPA WaterSense Program), it is not clear whether these meetings will be face-to-face, conference calls or some combination thereof. We would encourage EPA to make conference calling a "green" option.
- As regards providing EPA with access to "an electronic schedule of upcoming laboratory assessment schedule or similar providing information regarding applications in process related to ENERGY STAR"; we strongly recommend that EPA include a clause in the MOU stating that this information will not be publicly released until the scopes of laboratories are published on the accreditation body's website. Our concern here pertains to ILAC requirements for accreditation bodies maintaining confidentiality of their client's information.

Generally, we find the draft requirements to be acceptable and similar to what is already required under the EPA WaterSense Program in which we are currently participating.

Best regards,

Pat

Patrick V. McCullen
Vice President
Chief Technical Officer

International Accreditation Service
5360 Workman Mill Road
Whittier, CA 90601
Toll free: 866 427-4422
Phone: 562 699-0541 x3309
Fax: 562 699-8031
pmccullen@iasonline.org
www.iasonline.org