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Sent: Wednesday, April 21, 2010 1:12 PM
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Subject: Energy Star Verification Program Comments

Keystone Certifications appreciates the opportunity to contribute comments regarding the EPA's Enhanced Testing & Verification for the Energy Star Program, resulting from the March 29th Accreditation Bodies, Laboratories, and Certification Programs tele-conference.

GAO-10-470, *"Energy Star Program: Covert Testing Shows the Energy Star Program Certification Process Is Vulnerable to Fraud and Abuse"* (<http://www.gao.gov/products/GAO-10-470>) clearly establishes the need for more consistent third party involvement in both initial and on-going Energy Star Program qualification.

The challenge for the EPA is how to establish consistent and reliable administration of third party programs across the Energy Star product categories.

By specifying ISO/IEC 17025 accreditation the EPA has established clear and consistent criteria for the laboratories performing the E* qualification tests. I am concerned that the same clarity and consistency is conspicuously missing in EPA's establishment of criteria for the certification and verification program administrators.

In most cases, the accreditation bodies recognized to offer laboratory 17025 accreditation also offer ISO/IEC 17020 and ISO/IEC Guide 65 accreditation programs for inspection and certification agencies (respectively). Reference to these standards and accreditation programs is essential to the establishment of clear and consistent administration of the EPA's Verification Program.

The qualifications for Program Administrators indicated in the EPA's 3/29 presentation are a small subset of the qualifications established by 17020 and Guide 65. These requirements include agency quality management system criteria & documentation, liability insurance, confidentiality, impartiality, personnel training & qualification and many more details essential to the consistent administration of these types of programs.

Specifying administrator accreditation also relieves the EPA from "reinventing the wheel" in establishing its own requirements, not to mention resolving disputes or discerning answers to questions regarding such requirements, relying instead on the accrediting agencies to resolve such issues.

I welcome any questions from the EPA regarding these comments.

Respectfully Submitted,

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