



April 27, 2010

United States Environmental Protection Agency  
1310 L St. NW  
Washington, DC 20005-4113

Subject: Enhanced Program Plan for Energy Star Certifications

NSF International supports the effort being undertaken by the Environmental Protection Agency (EPA) and the Department of Energy (DOE) to enhance the Energy Star Certification Program and we appreciate the opportunity to review and make comments on this proposal. This program will help strengthen the credibility of the Energy Star Mark along with building consumer confidence.

Third party certification programs have a long track record of success in ensuring compliance to many different types of standards. These models can easily be used to support the Energy Star Certification Program, by providing initial and verification testing to ensure ongoing compliance. Manufacturers can save money by bundling the 3<sup>rd</sup> party certification services currently provided. Conducting energy efficiency testing concurrently with the testing we are already doing on a product will result in time and cost savings. This testing can be performed in our laboratory or at the manufacturer's facility during witness testing.

NSF recommends that the EPA require any certification organization participating in the Energy Star program be accredited by a recognized accreditation body, such as SCC (Standards Council of Canada).

The enhanced program has the capability of strengthening the Energy Star Certification Program and by working together with third party certification agencies, manufacturers, and buyers, the program could keep costs down. This should also reduce time to market delays and continue to build confidence in the Energy Star Mark. NSF supports the direction EPA and the DOE is going and we look forward to participating in the program.

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