



May 12, 2010

Subject: Draft AB Requirements

We would like to thank you for the opportunity to comment on the draft accreditation body requirements.

We have the following comments:

General Requirements, bullet 4:

1) Best efforts should be made to ensure that training is provided equally to all Accreditation Bodies (AB) simultaneously, so that accredited laboratories are not penalized due to their AB's inability to attend a training session. This concern would be applicable to on-going training as well.

2) In order to prevent market advantages and disparity in lab performance; the new requirements should be considered to not be effective until all AB's have been trained and accredited laboratories have had an opportunity to be properly assessed. This concern would be applicable to future revisions and additions as well.

3) NSF Recommends that EPA consider AB's current practice of equivalency (i.e., Natural Resources Canada Energy Efficiency) to assure that laboratory accreditation requirements are equivalent. Certain methods, albeit similar in nature, require different means of assessment. Therefore, there may be disparity in the practices of the laboratories for what outwardly would appear equivalent.

Best regards,

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