

TRANSOURCE

2405 West Utopia Road,
Phoenix, AZ 85027 USA
www.transource.com

Toll-Free: (800) 486-3715
Tel: (623) 879-8882
Fax: (623) 879-8887

May 12, 2010

US EPA

1200 Pennsylvania Ave NW
Washington, DC 20460

To Whom This May Concern;

I'm writing to you with great concern regarding the new EPA ENERGY STAR labeling mandates, which are being drafted and scheduled to go into affect later this year. As detailed in the Draft Accreditation Body Requirements, the EPA is planning to transition the ENERGY STAR labeling program away from self-certification towards a third-party testing requirement.

As a Woman-owned, Small Business that has been manufacturing computers for the Department of Defense, Federal Government, and Educational Institutions for over 25 years, we have had a lot of experience with ENERGY STAR testing and past EPA mandates. Prior to the current self-certification process now being used, the EPA had a third-party certification mandate very similar to the one that is being pushed for now. With limited access to a small pool of low-volume, high-cost certification facilities, the entire small business channel was backlogged and greatly impeded by an overly expensive, poorly executed process. While the small business market struggled with long production delays, waiting for system certifications to be approved, large manufacturers were able to skirt the process and gain an unfair advantage, due to their significant leverage with certification facilities, due to their high volume production and purchasing power, or by simply building their own high-dollar testing facilities.

In today's fast paced, highly competitive environment, a Small Business simply cannot compete with these new repressive testing requirements and the restrictive selling environment they will create. As a company concerned with our environmental impact, we understand the goals of the new EPA mandate, however we do not feel this is a fair and balanced process in which to implement them. The extreme financial and logistical burdens involved are simply too high and unyielding when considering their impacts,

which include: long delays in production, an inability to respond to time-critical order requirements, extreme logistical overhead, increased managerial costs, etc.

Transource believes that retaining the self-certification process should be reviewed by the EPA, or that special considerations should be made in regards to small business. If there are problems within the certification process, they should be resolved by increased verification testing and higher fines / penalties for non-compliant companies, rather than introducing yet another middle man into this process, thus driving up costs, potential for errors, and slowing down company productivity.

Transource has already made a sizable investment into our own ENERGY STAR testing lab by purchasing exceptionally expensive equipment such as an NIST traceable power meter, a lab quality AC power supply, and other such devices with the belief in the continued use of self-certification. Under these new requirements, these steps to support the EPA and ENERGY STAR label will have been made in vain, as our equipment purchased and processes used will no longer be sufficient under the new guidelines being drafted.

Transource was among the first to adopt the ENERGY STAR process, when there was little to no support for it within the channel, and now that it has been widely adopted and seen success in the market, we feel we should have a voice in its future direction. Small Business concerns and the markets in which they compete should especially be reviewed, since the majority of non-compliance issues within the ENERGY STAR label have occurred with large manufacturers and in industries outside of computer manufacturing, such as large appliances, heating and cooling, etc.

In conclusion, I thank you for your time and consideration in this very important matter. We hope you will take the time to further examine our concerns addressed and contemplate the implications they will make for the Small Business community.

Sincerely,



Ann Ting

President of Transource Computers