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Sent: Wednesday, April 28, 2010 11:45 AM
To: ENERGYSTARVerificationProgram@energystar.gov
Cc: JBaker@kellencompany.com
Subject: Comments for new version of Energy Star

To Whom it may concern:

EPA Energy Star has stated its preference to obtain products from the marketplace, but I anticipate a problem if/when EPA wants to collect a verification sample from any company that offers their products direct to customer. For example, many construction product manufacturers do not sell thru distribution or retail. Products are sold direct to owners and/or contractors. Consequently, contractors do not carry inventory of any additional product. The Cool Roof Rating Council had the same issue when in trying to conduct verification testing on Roof Coating products in the CRRRC Random Sampling Program.

The CRRRC resolved the verification issue by working with Underwriters Laboratories to collect certified product from inventory of the manufacturer, rather than from distributors or retail. Most roof products are manufactured under the UL Follow Up Service, which verifies products are being made the same way, all the time. The UL Follow Up Service is required of those roofing manufacturers who have roof system fire ratings, which is required under the current building codes. UL representatives conduct unannounced, random inspections in the course of running the Follow Up Service. UL also selects the sample, not the manufacturer. In this way, a manufacturer is not capable of preparing alternate materials for verification testing.

EPA Energy Star should recognize this sample collection method from the start and avoid future problems. Why re-invent the wheel?

Thank you,
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