

From: [Don Chip Plunkett](#)
To: [ENERGYSTARVerificationProgram](#);
Subject: Draft AB Requirements
Date: Monday, May 17, 2010 2:35:01 PM

To Whom it may Concern:

Thank you very much for your notable work in helping to ensure a greener environment. Your work is most noble.

One major concern with the more stringent requirements for product testing is that this limits competition to mostly major international brands, and force out of business thousands of smaller privately owned, women and minority companies.

More difficult and expensive testing has already resulted in excluding many of these smaller companies from competing with larger international companies, most of which mass market cheaper imports, albeit with Energy Star labels.

The vast majority of lighting manufacturers are smaller, private and/or women/minority owned. Many are "assemblers" and incorporate the same premium components used by the largest of companies. These small private and women/minority owned companies are nimble and greatly contribute to product innovation. However, their finances are often more limited than the larger international companies, many of which are spearheading efforts to advance these stricter standards, no doubt in an attempt to limit competition from smaller companies.

Rather than shift the burden and expense of testing to the thousands of small private and women/minority owned companies, please consider "strict compliance" with your own specifications that should be followed by all firms, large and small. Since lighting fixtures are not that complex and usually consist of very few key components such as ballasts, drivers, or transformers that are the same regardless of brand or company size, this will keep the focus on qualified products and components, while shifting the expense and burden of testing away from smaller firms.

And ultimately this can result in fair trade for all, and continued access to our domestic market by the thousands of local American private, women, and minority-owned companies.

Thank you,

Don Plunkett

On Mon, May 3, 2010 at 11:10 AM, EPA ENERGY STAR <ENERGYSTARVerificationProgram@icfi.com> wrote:



Dear ENERGY STAR® Partner or Interested Party:

Please find attached to this email an important memorandum from the U.S. Environmental Protection Agency (EPA). Also attached are the Draft Conditions and Criteria for Recognition of Accreditation Bodies for ENERGY STAR Laboratory Accreditation, and EPA's planned timeline for developing its enhanced testing and verification requirements.

EPA welcomes your feedback on the Draft Accreditation Body Requirements by May 14, 2010.

Thank you for your continued support of ENERGY STAR.

For more information, visit: www.energystar.gov

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