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Sent: Friday, June 25, 2010 11:36 AM
To: 'ENERGYSTARVerificationProgram@energystar.gov';
'monahan.eamon@epa.gov'
Cc: Kripahle, Andreas; Landsbeck, Raimund; Henning, Bernd; Kanemitsu, Hideyuki
Subject: Comments on the Draft Certification and Verification Requirements
Importance: High

Dear Eamon,

Fujitsu Technology Solutions appreciates the opportunity to participate in the stakeholder process and offer comments on the Draft Certification and Verification Requirements for Certification Bodies, Accreditation Bodies and Laboratories.

As manufacturer of IT products, Fujitsu Technology Solutions (FTS) comments are limited to the product categories Computer and Server.

1) Laboratory requirements

- Testing laboratories should be certified in accordance with ISO 17025:2005 for the applicable Energy Star test procedure.
- The laboratory's performance should be accredited by a third part accreditation body, which is member of the Multilateral Agreement of ILAC.
- Certified laboratories (ISO 17025) shall be entitled to do qualification and verification testing.

2) Certification Bodies – Third part verification FTS doesn't support a third part verification for a voluntary label. It seems disproportionate to the potential risks in the sector of IT equipment.

3) Accreditation Bodies

All accreditation bodies which are member of the Multilateral Agreement of ILAC, should be accept by EPA without additionally EPA registration requirements.

With best regards

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