

Jun 25, 2010

**Comments on “Conditions and Criteria for Recognition of Certification Bodies
for the ENERGY STAR® Program *DRAFT*”**

JEITA Energy Saving Committee
(PC group)

1. Application for Recognition by a CB report

Please investigate a system where an ODM company obtains a certificate of recognition (CB report), and a manufacturing outsourcer (the owner of the brand), which is an ENERGY STAR partner, applies for recognition using the certificate of recognition (CB report) as an evidence document.

2. Problem of Product Listing by a CB

A CB report from an ODM company should be accepted. A CB is used for ENERGY STAR product listing in the ENERGY STAR Process Flow Diagram, but this is a duplication of CB, so we believe that a listing method by ENERGY STAR partners themselves is also required.

3. Ongoing Verification

Multiple CBs will be involved if an ENERGY STAR partner uses more than one third-party testing laboratory. How is this case considered in the verification testing in the ENERGY STAR Process Flow Diagram?

4. Alternative Approaches

We understand that there are following alternative approaches, but only WMT and SMT are included in the proposal from EPA. What is the intention behind it?

- Testing at Manufacturer's Premises
- Witnessed Manufacturer's Testing
- Acceptance of Client's Testing
- Supervised Manufacturer's Testing

5. Schedule

We request an enforcement moratorium of one year or more as a one-year preparation period after all requirements have been finalized.