



June 25, 2010

Ann Bailey, Chief
ENERGY STAR Labeling Branch
U.S. Environmental Protection Agency

Re: Draft Certification and Verification Requirements

Dear Ms. Bailey:

On behalf of Samsung Electronics, I am pleased to provide the following comments regarding ENERGY STAR's draft certification and verification requirements.

ENERGY STAR is a highly valued brand, easily recognizable by consumers as an indicator of top-performing energy efficient products. Samsung strongly supports EPA's initiatives to ensure the integrity of the ENERGY STAR program and to preserve consumer confidence in the brand. Therefore, Samsung is in agreement with EPA's draft requirements for enhanced certification and verification. Our specific comments are as follows:

1. High quality testing of energy efficiency, performed by manufacturers under supervision of a Certification Body (CB), is not new to industry. A precedent exists in the case of Natural Resources Canada (NRCAN). Under NRCAN's procedures, manufacturers perform energy efficiency testing according to NRCAN requirements and a CB's guideline, and submit the test results to the CB for review. Once the results have been approved by the CB, manufacturers submit the qualified models and their respective test results to NRCAN for listing.

Samsung prefers that the new ENERGY STAR protocol for product listing similarly allow Partners to submit their lists of certified products and data directly to EPA once they have received confirmation of certification from the CB. This small change would not reduce the integrity of ENERGY STAR and would improve efficiency, enabling manufacturers to keep up with very rapid and challenging product introduction timetables.

2. We appreciate the EPA's proposed flexibility of allowing CBs to accept test data from laboratories that are not recognized directly by EPA, provided those laboratories participate in a CB's WMTL or SMTL program. The draft does not appear to clarify whether such a laboratory must also be accredited to ISO/IEC 17025. Such accreditation may not necessarily be a requirement in every CB's WMTL or SMTL program. Samsung hopes that this can be clarified.

3. In the spirit of maintaining integrity, Samsung believes that all CBs should be required to maintain a basic ENERGY STAR certification and verification program that is accessible to all ENERGY STAR partners as a stand-alone service. Manufacturers should not be required by CBs to purchase a bundle of additional services offered by the CB in order to obtain the ENERGY STAR certification and verification services. Bundling ENERGY STAR-related services with additional services should be at the manufacturer's option, not a requirement.
4. Consumer Electronics is an ever-evolving industry, aimed at entertaining, informing, and assisting consumers. The industry's rapid advances in technology require fast paced changes to product standards and specifications, including energy efficiency. Over the course of many years, ENERGY STAR has demonstrated the ability and willingness to keep its specifications current with technology developments. As the U.S. Department of Energy (DOE) begins to develop potential minimum energy efficiency regulations for consumer electronics, Samsung hopes that with the proposed enhancements to ENERGY STAR, it may be possible for DOE to accept ENERGY STAR qualification as a means of demonstrating compliance to any DOE regulations, with no additional testing or other requirements. We would like to encourage dialogue between EPA and DOE toward this end.

Thank you for the opportunity to comment on the Draft Certification and Verification Requirements. Samsung looks forward to a strong, comprehensive certification and verification program which will ensure that consumers are the ultimate beneficiaries.

Sincerely,



Michael Moss
Director of Corporate Environmental Affairs
Samsung Electronics America