

May 26, 2010

To: ENERGYSTARVerificationprogram@energystar.gov

The Aurora International Testing Laboratory, AITL, is pleased to have the opportunity to comment on the EPAs "Conditions and Criteria for Recognition of Laboratories for the Energy Star program "DRAFT". Our comments are in *italics*.

AITL is accredited by NVLAP in the Energy Efficient Lighting Program. We have maintained ongoing accreditation in this program since 2002. Our lab code is 200671-0.

General Requirements:

AITL is in full agreement with the requirements stated in this section.

Inter-laboratory Comparison Testing:

AITL fully supports this new initiative to help ensure harmonization amongst test labs. This is strong positive step towards improvement in the scheme.

Reporting:

Bullet 1: "Submit to EPA evidence of accreditation including" 4 sub bullets. *AITL fully supports these reporting requirements.*

Bullet 2: "Submit to EPA documentation demonstrating the impartiality..... or other pressures and influences that may adversely affect the quality of their work." *AITL fully supports these requirements.*

"In the case of "in-house" laboratories, this shall include evidence that:

Sub Bullet 1: "Laboratory employee compensation or annual bonuses are not tied to the financial performance of the parent company; *it is not clear how one can separate employee compensation from the financial performance of the parent company. On what basis would employees be compensated? Compensation is generally merit based; based on pre-agreed objectives and performance measures. Ultimately the financial aspect is a mix of individual performance and company profitability. EPA should re-consider this requirement.*

Sub bullet 2: "laboratory engineering personnel do not originate with or return to the parent company, or otherwise look to the parent company for career advancement; *What constitutes "laboratory engineering personnel"? Those with Bachelors or higher degrees? Does this apply to non-degreed personnel? EPA should clarify the intend personnel.*



Restricting career advancement both in test laboratories and outside the test laboratory is not in the best interest of personnel development and ensuring the best and most qualified candidates are selected. Often lab experience and working knowledge of the test methods can be a valued skill in the parent company non lab functions. Similarly, having parent company functional experience in can be a valued skill and asset when working in the tests lab. AITL does not think these personnel growth and development paths should be restricted. It compromises personnel growth and development. Rather the focus should be on ensuring impartiality, objective and freedom from undue stress and conflict in the test laboratory. EPA should re-consider these requirements.

Sub bullet 3: *AITL fully supports these requirements*

Sub bullet 4: *AITL fully supports these requirements*

Bullet 3: *AITL fully supports these requirements*

Bullet 4: *AITL fully supports these requirements*

Again, thank you for the opportunity to comment.

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