



May 28, 2010

Dear Ms. Kathleen Vokes:

On behalf of Bradford White Corporation, please accept our appreciation for the opportunity to comment on the proposed water heater ENERGY STAR<sup>®</sup> program changes relating to Draft Lab Requirements. Our comments are provided below for your review and consideration.

Bradford White Corporation (BWC) agrees that a recognized laboratory must hold and maintain ISO/IEC 17025 accreditation, and we believe it must be accredited by an ISO/IEC 17011 Accreditation Body (AB). Also, all details of a laboratory's accreditation must be made available, upon request, to the EPA.

As stated in previous correspondence, many manufacturers, including BWC, hold an ISO/IEC 17025 accreditation, which allows them to accurately perform efficiency testing in their facility. Bradford White is also a proud member of the Air-Conditioning, Heating, and Refrigeration Institute (AHRI). AHRI already maintains a rigorous, independent product efficiency certification and verification program with stringent acceptance and listing criteria.

The AHRI program is accepted by the DOE and California Energy Commission and has proven accurate and sustainable over many years. Given the stringent AHRI listing/verification processes, BWC urges acceptance of this program for ENERGY STAR products. Provided the manufacturer has an ISO/IEC 17025 accredited test facilities and are a participant in the AHRI program, BWC believes the ENERGY STAR program would be best served by using the existing AHRI system. Mandating another system creates a needlessly redundant and costly hurdle without improving rating accuracy or the value of the ENERGY STAR brand.

Again, Bradford White Corporation thanks you for this opportunity to comment on the Draft Lab Requirements proposed for the water heater ENERGY STAR program. We urge the EPA/DOE to modify the Lab Requirements pursuant to our comments, and we would like to reference our comments regarding the Enhanced Testing and Verification program submitted on April 30, 2010.

Respectfully submitted,

Bradford White Corporation

Michael W. Gordon  
Vice President, Engineering

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