

From: [Walker, Darrel](#)
To: ENERGYSTARVerificationProgram@energystar.gov;
cc: [Smith, Wayne](#);
Subject: Delfield Comments on Draft Laboratory Requirements for Energy Star
Date: Friday, May 28, 2010 2:54:19 PM

Delfield has reviewed the “Conditions and Criteria for Recognition of Laboratories for the Energy Star Program” draft and respectfully submits the following feedback:

- We agree and support the wording contained within the “General Requirement” section with regard to accreditation requirements, the notification to the EPA for hiding or influencing results, recording of accreditation and allowing the EPA to witness any testing performed.
- We agree with all portions of the Inter-laboratory comparison testing section of the draft.
- We agree with and support the submitting to EPA evidence of accreditation as outlined.
- We are strongly opposed to the proposed requirements for laboratory employee compensation to not be tied to the financial performance of the company. We feel this is unnecessary and would make it difficult to motivate laboratory individuals to perform in a productive manner.
- We strongly oppose the proposed requirements that laboratory engineering personnel do not originate with or return to the parent company or otherwise look to the parent company for career advancement. We feel this would essentially preclude the use of internal testing and force our industry to do unnecessary and impractical third party testing for all products. The product lines manufactured by the Delfield Company contain many models which have very low sales volumes. Forcing third party testing of all models would burden these higher efficiency products with unnecessary costs and subsequent pricing.
- We agree with and support the last two sections of the reporting section regarding ethics and compliance audits as well as the section on mechanisms for reporting on undue influence.
- We agree with and support the remainder of the draft.

Please let me know if you have any questions regarding this feedback.

Sincerely,

Darrel Walker

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Integrity, Commitment to Stakeholders, and Passion for Excellence