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To: ENERGYSTARVerificationProgram@energystar.gov
Subject: Comments on Conditions & Criteria for Labs
Date: Thursday, May 27, 2010 2:59:12 PM

Thank you for the opportunity to comment on this draft.

Our first comment relates to the fact that the determination of testing requirements for insulation and home sealing products has been delayed and are unknown at this time. If we do not know which tests are required we will not be able to adequately comment to the lab requirements. Therefore lab requirements for insulation and home sealing products should be determined at a later date after the determination of the testing requirements.

On page 2, Recordings, the second bullet point states that they shall include evidence that . . . What form of evidence would be required for these items? It seems that these items are very broad which would make it extremely difficult for an in-house lab to comply. Ultimately this would lead to higher costs for the manufacturer even though these labs are accredited and recognized by other listing agencies such as UL and ICC-ES.

Again, thank you for the opportunity to comment. If you have any questions please don't hesitate to contact me.

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