



## GE Consumer & Industrial

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May 28, 2010

Kathleen Vokes  
Energy Star Product Development  
Environmental Protection Agency  
1310 L Street, NW  
Washington, DC 20005

Dear Ms. Vokes:

Re: GE Appliances & Lighting Comments on the ENERGY STAR'S "Draft Conditions and Criteria for Recognition of Laboratories for the ENERGY STAR program.

On behalf of GE Appliances & Lighting, I would like to provide our comments to the Environmental Protection Agency (EPA) ENERGY STAR Program on its Draft Conditions and Criteria for Recognition of Laboratories for the ENERGY STAR program. GE Appliances & Lighting has had a long commitment to energy efficiency, including the manufacture of energy efficient appliances, as evidenced by receipt this year of ENERGY STAR's Sustained Excellence award for the fifth straight year. As such we have a strong commitment to the value of the ENERGY STAR brand, and offer these comments to you for your consideration.

GE Appliances & Lighting hereby adopts by reference the comments submitted by the Association of Home Appliance Manufacturers (AHAM) and supplements them in the following respects.

GE would like to reiterate the importance, as outlined in our April 30, 2010 comments, of EPA authorizing manufacturer (in-house) labs for product qualification under the ENERGY STAR program. We would also like to support what we believe to be EPA's recognition of the appropriateness of in-house labs for these purposes with certain conditions in EPA's May 17<sup>th</sup> proposal. Specifically, we support use of the Supervised Manufacturer Testing (SMT) facility paradigm utilized by Natural Resources Canada through the Standards Council of Canada, which requires certification by an accredited third party lab to ISO 17025 standards, among other things. We believe that adherence to these standards, with their incumbent protections, is sufficient to ensure the competence and objectivity of these labs, and do not believe that it is necessary to supplement these requirements as described in EPA's proposal. Specifically, the existing requirements of ISO 17025 are more than adequate to ensure the independence of product tests, and to impose additional burdens on manufacturer labs without a showing of need will not add value to the process and will impose

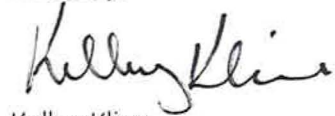
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unnecessary burdens on manufacturers. EPA and DOE have various enforcement tools available to them should there be concerns regarding any specific instances of impropriety in product tests.

Companies such as GE have robust compliance programs and high ethical standards for its employees that act to safeguard the integrity of our in-house labs, and to assume that simply because a laboratory is affiliated with a GE business and employees that the data may somehow be lacking in credibility is an improper assumption. In fact, the converse may be true, and EPA by forcing lab certification to entities without the same interest in ensuring their credibility and high standards may have unintended consequences of sacrificing data quality.

GE Appliances & Lighting continues to be a strong supporter of EPA's efforts to improve the efficiency of the nation's appliances. Please feel free to contact me at (502) 452-7603 with any questions.

Sincerely,

A handwritten signature in black ink, appearing to read "Kelley Kline". The signature is fluid and cursive, with the first name "Kelley" and last name "Kline" clearly distinguishable.

Kelley Kline