

From: [Ed Cunningham](#)
To: ENERGYSTARVerificationProgram@energystar.gov;
Subject: Draft Lab Requirements
Date: Friday, May 28, 2010 11:58:39 AM

To Whom it May Concern,

While we agree that it is important to maintain impartiality and make sure controls are in place to prevent undue pressure on laboratory employees from achieving desired results, the conditions proposed under the "in-house" laboratory are unrealistic. "In-house" lab employees are direct employees of the parent company and as such compensation and bonuses will naturally be tied to financial performance of the company. In our eyes this is not a problem as the best way to achieve financial success is to accurately test and certify products for energy use and quickly find and resolve any energy usage issues. If this criteria is put in place with no modifications it will prevent us from participating in the Energy Star program as we do not have the financial resources to pay a fully independent "in-house" laboratory for these services.

Respectfully,

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