

**From:** [John Redick](#)  
**To:** [ENERGYSTARVerificationProgram@energystar.gov](mailto:ENERGYSTARVerificationProgram@energystar.gov);  
**cc:** [Doug Claywell](#); [Jeff Kincer](#); [Tim Crammer](#);  
[Bill Casey](#);  
**Subject:** Comments on Draft Laboratory Requirements.  
**Date:** Thursday, May 27, 2010 7:13:39 AM

---

To whom it may concern:

We at Henny Penny are concerned about the proposed laboratory requirements the EPA is preparing to implement. As an Energy Star partner, we take pride in the fact that a lot of our equipment meets E-Star status. We have put a lot of effort into our own laboratory to ensure we have the capacity to test to the applicable ASTM test standards. This effort includes test method training, equipment purchases, laboratory enhancements, etc. Now none of that matters and we're being asked to become ISO 17025 accredited which would be very expensive.

According to the proposed requirements, even if we wanted to become ISO 17025 accredited, we still couldn't test in our own lab based on the following requirements:

“laboratory employee compensation or annual bonuses are not tied to the financial performance of the parent company”

“laboratory engineering personnel do not originate with or return to the parent company, or otherwise look to the parent company for career advancement.”

I think it's also important to mention that our engineering lab is currently approved to produce data for the use of safety certification by multiple major NRTLs. A major NRTL with over 100 years of history approves our laboratory for data submittal to qualify our equipment for user **SAFETY** and EPA wants to make more stringent requirements for **ENERGY CONSUMPTION**? That just doesn't make sense.

In summary, we feel the proposed requirements are excessive to say the least.

**John Redick**

Agency Engineer  
Henny Penny Corporation  
(937) 456-8689 - Office  
(937) 456-8952 - Fax

[jredick@hennypenny.com](mailto:jredick@hennypenny.com)