

From: [Pat McCullen](#)
To: ENERGYSTARVerificationProgram@energystar.gov;
cc: [Raj Nathan](#); [Hershal Brewer](#); [Ron Coiner](#);
Subject: Comments on Draft Laboratory Requirements for Energy Star
Date: Friday, May 28, 2010 6:00:01 PM

Thank you for the opportunity to comment on the Draft Laboratory Requirements for Energy Star. The following are comments submitted by International Accreditation Service (IAS):

- Page 1, bullet # 5, Calibration of equipment: To ensure traceability of measurements, EPA should require that calibration services be provided by calibration laboratories accredited to ISO/IEC standard 17025 by an ILAC-recognized accreditation body.
- Currently, IAS does not put expiration dates on the accreditation certificates issued to testing laboratories. All certificates of accreditation including the scope of accreditation of testing laboratories are readily available on the IAS website and we encourage building officials, regulators and other users of IAS accreditation to always refer to the IAS website for current information.

Each certificate of accreditation for testing and calibration laboratories and inspection agencies has a "commencement date" only. Laboratories and agencies may apply for accreditation for one, two, or three years; however, all laboratories and agencies are assessed at least once every two years and must demonstrate continuing compliance with IAS accreditation requirements. IAS believes that it may be misleading to put expiration dates on the certificates, as changes (including cancellation or revocation of accreditation) may occur during the accreditation period. Only accreditation certificates appearing on the IAS website are considered current and valid.

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