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Dear Ms. Vokes and other interested parties:

Thank you for the opportunity to comment on the recent draft proposal regarding the Recognition of Laboratories to perform Energy Star testing. My comments below primarily reflect testing of lighting products.

Intertek appreciates and welcomes all review of its accreditations. We are 17025 accredited as well as A2LA and NVLAP for many lighting products. Our quality system is sizeable and in place.

Intertek agrees to participate in any relevant inter-laboratory round robin testing deemed necessary. We would offer to release the past 10 years of NVLAP round robin results if NVLAP would agree. Intertek would request that the criteria for acceptance into this program be published. The quality of a program would be diminished if there were no published tolerances for the pertinent measurements.

Intertek welcomes visits by the EPA or EPA-appointed representatives at any time.

We would also like to continue the accessibility and advisement of any test methods while the program consolidates under the EPA.

Best regards,

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