

## **The comment for a Conditions and Criteria for Recognition of Laboratories for the ENERGY STAR® Program**

1. As an authorization condition of the experiment station in the companies, I require following four points, but the experiment station in the company does not consist of the draft substantially when (1) and (2) are adopted as an authorization condition.

Therefore, we want to call for the deletion of (1) and (2) of the experiment station authorization condition from EPA draft.

- (1) laboratory employee compensation or annual bonuses are not tied to the financial performance of the parent company;
- (2) laboratory engineering personnel do not originate with or return to the parent company, or otherwise look to the parent company for career advancement;
- (3) laboratory employees are required to participate and regularly pass third-party ethics and compliance audits conducted in accordance with the International Federation of Inspection Agencies (IFIA) Compliance Code or equivalent standards for ethics and compliance programs; and,
- (4) mechanisms for reporting and responding to attempts to exert undue influence on the test results are in place. This shall include establishment of an external system for employees to make such reports and follow-up on such claims, as well as regular education of staff as to what avenues are available to them should they identify attempts to influence test reports.

2. From the results of 17025 ISO certification acquisition of the noise measurement business, I predict that a period of approximately 1-1.5 year is necessary for 17025 ISO certification acquisition of consumption power measurement duties. Therefore, I call so that it is with after January, 2012 at a copier, the time to apply a condition with "the measurement with the third party authorization engine or the measurement at the experiment station in a company adapting to an experiment station authorization condition" as requirements necessary for a report level of the ENERGY STAR program of the compound plane, printer product.