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To: ENERGYSTARVerificationProgram@energystar.gov
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Here are some of our thoughts and concerns:

- Who are the likely candidates for an EPA appointed Accreditation Body? Whoever is selected in this role, should not be allowed to participate as a testing lab now or in the future as this will create a conflict.
- What are the types of control that will be used to ensure that a manufacturer's lab is independent? It appears that for the beginning stages of the program, witnessing by an independent entity would create a much more robust program. When the program matures and when manufacturers test labs build some credibility, they can be allowed to perform some level of testing un-witnessed. Manufacturers should be allowed to shop around amongst approved independent laboratories to come in to perform witness testing.
- Witness Testing can be part of the scope for independent test laboratories. They will obviously need to have capable staff who are able to travel to manufacturers labs to witness the testing.

best regards,

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