

From: [Jim Hulbert](#)
To: ENERGYSTARVerificationProgram@energystar.gov
Subject: FW: Draft Lab Requirements for ENERGY STAR
Date: Tuesday, June 01, 2010 1:03:04 PM

From: Jim Hulbert
Sent: Thursday, May 27, 2010 10:03 AM
To: 'ENERGYSTARVerificationProgram@energystar.gov'
Subject: Draft Lab Requirements for ENERGY STAR

Thank you for the opportunity to comment on the proposed new Lab Requirements under the ENERGY STAR program.

I would like to object to the EPA proposal to supplement the ISO/IEC 17025 requirements associated with ensuring the independence of the in-house laboratory from the manufacturer. As Lab Manager of an in-house test lab that is accredited by A2LA to ISO/IEC 17025 requirements, and which has ENERGY STAR OM Test Procedure for Imaging Equipment on our scope of accreditation, I can assure you that the assessors look closely at our independence under ISO/IEC 17025 clause 4.1.4 and our organizational structure which assures that independence. A2LA is satisfied with our independence. Other agencies, such as the FCC, accept the A2LA assessment and I believe the EPA should follow suit. The proposed supplement by the EPA preventing employee compensation or career advancement to be tied to the parent company is unnecessary, not a requirement by any other agency that recognizes ISO/IEC 17025 accreditation, and would in effect prevent our in-house test lab from testing our company's products, adding unnecessary burden and cost to us as a manufacturer. I'm sure this would be the case for many other companies as well.

Thank you for considering my input.

Regards,

Jim Hulbert, Principal Engineer/Team Leader
Compliance Engineering & Environmental Test
Pitney Bowes, 35 Waterview Drive, Shelton, CT 06484-4301

Tel: 203-924-3621, jim.hulbert@pb.com