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To: ENERGYSTARVerificationProgram@energystar.gov;
Subject: Draft Lab Requirements
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I apologize for the tardiness of these comments, but hope that they are included in the stakeholder comment summary for recognition of laboratories. These comments may be shared with other stakeholders.

- It is agreed that ISO 17025 is required to ensure lab operation quality.
- It is strongly recommended that EPA evaluate the potential to require NVLAP certification for optical testing in ALL labs (internal or 3rd party). NVLAP has been widely accepted by both consumers and industry partners for many years. The important aspect of this is that all labs are evaluated equally.
- For thermal testing, agencies such as UL and CSA (amongst many others) are widely used and accepted throughout the lighting industry.
- 'Scopes of accreditation' do not appear to be necessary as products are tested according to applicable standards such as UL/CSA (thermal, electrical, mechanical) and IES (optical and efficacy). EPA should focus on what accreditations and testing protocols are required from what is already generally accepted in the industry as opposed to creating new ones.
- EPA's coordination of round robin testing would not appear to be necessary if NVLAP is required for Energy Star. NVLAP requires round robin testing annually to validate testing performance and calibration amongst industry peers. Coordination of efforts such as this incur burdens on EPA that are not necessary.
- It should not be necessary (and is strongly discouraged) that lab personnel be specifically acknowledged to EPA. Labs will be accredited via certified AB's, so disclosure of personnel would not seem prudent if the lab is found to be in compliance. It is incumbent upon manufacturers to hire qualified and capable personnel to conduct such testing as to ensure quality, safety, and performance levels. This is necessary for stakeholders to maintain a competitive stance in the industry and garner consumer confidence.
- Witness testing should only be conducted for qualified personnel acting on behalf of the AB. If the lab is accredited and found compliant to all Energy Star criteria, why would this be necessary? This would seem to be an unnecessary cost burden to EPA in both time and expertise required to adequately understand the testing procedures under evaluation.
- Each stakeholder will have its own procedure to ensure ethical practices in all aspects of operation. If the lab is accredited by a certified AB, isn't this sufficient (along with the stakeholder agreement) to establish an understanding of ethics between the two parties?

The opportunity to participate in this stakeholder comment period is appreciated. Again, I apologize for the late response.

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