

May 27, 2010

**Seiko-Epson comments regarding:  
Conditions and Criteria for Recognition of Laboratories for the  
ENERGY STAR® Program \*DRAFT\***

**1) Regarding timeliness of authorization for third party accreditation bodies and testing labs.**

We suggest that the EPA post a list of third party accreditation bodies and authorized testing labs for Imaging Products as soon as possible (by June 14 at the latest). This lead time will be necessary to meet our schedule for this year.

We further request that the following be considered for the list of officially recognized accreditation bodies:

- USA: UL
- Canada: CSA
- EU: TUV
- Japan: JAB

<Reasons>

- It is difficult for us to meet EPA's timeline. (We would have to submit a test report from an accredited test lab before the end of the year.)
- Our in-house test lab has already received ISO17025 certifications from major, third-party accreditation bodies for safety standards testing. We could meet the EPA's schedule by adding certifications for testing standby power for IT equipment.

**2) Regarding accreditation for test labs.**

Suggestions:

- Use an accelerated procedure  
— Or —
- Allow test reports to be submitted during the accreditation period, as long as an acceptable accreditation schedule has been agreed upon.

<Reason>

We believe that official accreditation takes an entire year.

### **3) Regarding Energy Star registration in Japan (ECCJ)**

We would like to continue to register products for Energy Star in Japan.

<Reasons>

- Japanese to English translation causes delays and adds costs.
- We have already developed an experienced, cost-effective and ethical in-house lab for the Energy Star application system.