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Subject: Draft Lab Requirements
Date: Friday, June 04, 2010 5:19:45 PM
Attachments: [Traulsen Comment Letter 4-30-2010.docx](#)

Date: June 4, 2010

To: Kathleen
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From: Joe Sanders, Senior Engineer
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Subject: Comments, Conditions and Criteria for Recognition of
Laboratories for the ENERGY STAR Program

Please find below Traulsen's response or commentary to EPA's proposal for Conditions and Criteria for Recognition of Laboratories. We have taken great care in its preparation and know it contains many insightful observations and suggestions. Traulsen believes the Energy Star Program has a meaningful purpose in providing Energy Efficiency Data for Commercial and Consumer Products to potential purchasers or end users. While a portion of the following summary may be applicable to all categories of Energy Star List products, most comments focused on Commercial Food Service Equipment manufacturers.

While agreeing in principle to most aspects of the "Draft" document, Traulsen does raise concerns with the requirement to provide "***documentation demonstrating the impartiality and freedom of laboratory management and personnel from any undue internal or external commercial, financial or other pressures and influences that may adversely affect the quality of their work***". Speaking for Traulsen and myself, I can assure EPA that we operate with the highest degree of integrity and ethical values, but I'm unclear to the extent of application these requirements have in regard to the makeup/personnel of a manufacturer's "In-House-Lab".

Statement #1 "***Laboratory employee compensation or annual***

bonuses are not tied to the financial performance of the parent company.” While it is true lab personnel are exempt from any company performance bonus programs, how would this affect the annual merit performance assessment and raise for each individual?

Statement #2 *“Laboratory engineering personnel do not originate with or return to the parent company, or otherwise look to the parent company for career advancement.”* What or who represents the parent company? Speaking for Traulsen, the supervising laboratory engineer (myself) is a current and contributing member of the Traulsen engineering department, responsible for the development of all refrigeration systems used in company produced commercial refrigerators and freezers. And although I’m not anticipating or desiring a career advancement, in the total scope of one’s carrier, it is not unreasonable to imagine an engineer attaining creasing levels of responsibility in company stewardship.

Statement #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.”* Although I do not fully understand what this program encompasses, Traulsen fully supports an ethical and accountable standard of behavior from all its employees. Each year, and under the direction of our parent company, Illinois Tool Works (ITW), each employee must read and agree to a statement of “Corporate Ethics/Conduct”. How would EPA handle this requirement when “In-House-Labs” are administered/audited through the Certification Body (CB)?

Statement #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.”* I hope this items is attainable through the current procedures of reporting questionable activities as outline in the company’s Corporate Ethics Policy identified in “Statement #3” above.

I hope you find the comments above helpful in preparing your Laboratory Criteria and Recognition Specification. Thanks again for the opportunity to comment.

Sincerely,

Joe Sanders,
Senior Engineer

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