

Comments on:

“Conditions and Criteria for Recognition of Certification Bodies for the ENERGY STAR® Program”

1. Section 3) a) i) (2) (a):

Recommend adding rounding conditions for the 10% number. Suggest changing to read “Annually test at least 10% (rounded up) of all ENERGY STAR qualified base models ... .”

Reason: As written, if a CB had less than 10 ENERGY STAR qualified base models, it could be argued that no annual verification tests were required.

2. Section 3) a) i) (3)

This paragraph leaves the selection scheme up to the CB with general guidelines that follow. I would agree with this approach. However, section 3) a) i) (3) (b) adds a requirement to the guideline. Is the random selection of 50% a guideline or a requirement? The use of the term “shall” indicates that it is a requirement, but the lead in calls it a guideline. I recommend changing 3) a) i) (3) (b) to read, “Approximately 50% of models to be tested ~~shall~~ should be randomly selected ... .”

Same comment for section 3) a) i) (3) (c) which should be changed to read, “The remaining models ~~shall~~ should comprise models selected in ... .”

Reason: Selection of qualified ENERGY STAR models for verification testing should either be (1) left up to the CB, (2) designated by ENERGY STAR staff, or (3) use a selection scheme determined by ENERGY STAR. I do not believe that a single formula or scheme could be developed to fit all circumstances and I do not think that the ENERGY STAR program is staffed to take this on. So, I recommend that the CB be responsible for the selection with the guidelines presented, without the requirements.

3. Section 3) a) General

There should be a clause that deals with verification testing failures. Borrowing what is in the ENERGY STAR Residential Ventilation Fan Protocol, recommend adding, “Resolution of failures: The [CB] shall have in place a procedure to resolve product failures, and provide EPA with details of this procedure.”

A CB may have procedures to ensure that any poor product performance is due to the product and not an anomaly that would not be typical of that product. There could be many reasons out of the control of the manufacturer that may cause the product to not perform as certified. An example would be shipping or handling damage.

4. Section 3) b) ii) (2):

Recommend that the first sentence of this section be changed to read, “If it has been determined that ~~the changes indicate~~ the product no longer meets the product performance requirements ... .”

Reason: This would be an editorial change that makes it clear that a product’s performance has changed before being reported to ENERGY STAR in a two day time frame. A two day time frame is short. A change that indicates that a product may no longer perform as certified is not clear as to when the two day period starts.

5. Section 3) c) ii) (1)

Recommend changing this section to allow the either the challenger or CB to convey to the challengee that the product has been challenged.

This would add to the flexibility of the procedure.

6. General

Suggest that there be a statement that these requirements would not supersede any specific requirements found in a Energy Star qualification protocol. Due to the nature of a product, there may need to be more or less stringent requirements.