



TO: Ann Bailey, Chief
ENERGY STAR Labeling Branch
U.S. Environmental Protection Agency

August 4, 2010

From: Jim Boldt
Vice President Engineering
Broan-NuTone LLC

Subject: Comments Relating to the July 23rd Final Draft of the Conditions and Criteria for Recognition of Certification Bodies for the ENERGY STAR Program.

I must commend ENERGY STAR for listening to their partners and their positive response to the comments from the First Draft. The Final Draft of the Conditions and Criteria for Recognition of Certification Bodies for the ENERGY STAR Program is an excellent document that addresses most of the concerns raised in the review period.

While I support the majority of the document, the one issue of remaining concern is the acceptance of the manufacturer's first-party laboratories. The Ventilating Fan Program has many years of experience and market success with the Third Party Qualification, Certification, Verification and Challenge Testing process. We continue to advocate the use of the Third Party process to provide protection to the consumers and to ensure the integrity and defensibility of the ENERGY STAR program.

Thank you again for consideration of my comments.