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To:	ENERGYSTARVerificationProgram@energystar.gov;
cc:	"Eamon Monahan"; "Mark Grimes"; "Steve Urich";
Subject:	Final Draft Certification & Verification Requirements
Date:	Friday, August 06, 2010 3:13:17 PM

Once again we thank the EPA for the opportunity to provide input in the development of the CB document.

We understand the EPA's motivation to establish a program to ensure Energy Star product conformance claims at a minimum cost to the manufacturer partners. The certification scheme defined in the final draft document seems to rely solely on the product qualification and random verification testing, with no requirement for CB's to perform in-plant assessment of manufacturer quality management or production methodology.

We believe this may be an effective and relatively low-cost strategy, but we have concerns regarding two certain scenarios:

1. **Products manufactured at more than one facility** – does the EPA wish to assume that the same model manufactured in two or more locations (countries?) will perform the same? Can we rely on the manufacturer to provide us with procurement information that will equitably yield verification test specimen from each manufacturing facility?

Suggested solution – require products to be qualified by model and manufacturing facility. The EPA website listing may only need to indicate the manufacturer and model but behind the scenes the CB is administering verification testing of products from each manufacturing facility and ensuring the consistency of Energy Star qualified product performance.

2. **"Private Labeled" products** – will partners with products manufactured by other companies be qualified separately or does the EPA anticipate allowing each private labeler to somehow "share" in the qualification obtained by the actual manufacturer?

If private labelers are permitted to share or "piggyback" Energy Star qualifications with those of the actual manufacturers, who will determine what product variation will or will not require a separate qualification? Also,

would the 10% verification sample include all private labeled variations of the product? If so, we fear the verification sample percentage could very quickly become irrelevant.

Suggested solution – require private labeled products to be qualified separately, eliminating qualification "gray areas" and ensuring private labeled products are sampled and verification tested equitably, further ensuring the consistency of Energy Star qualified product performance.

We realize the EPA can allow CB's to determine how to address the above scenarios, but we fear that if the EPA is not specific, the market may drive the practice to the lowest common denominator and the Enhanced Testing & Verification may not achieve its stated goals.

I welcome your questions or comments,

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Ask us about the new Keystone Insulating Glass Certification Program.