

August 4, 2010

Seiko-Epson comments on:

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

Final DRAFT

1. Seiko-Epson is concerned about the role of Certification Bodies in the International Energy Star program. We believe that third-party verification as proposed may not be possible for Energy Star International Partners. Seiko-Epson markets Energy Star qualified products in Europe, Asia and Oceania, as well as North America.

The Enhanced Verification Program seems to represent a shift towards US-only Energy Star. It may be difficult to meet the demand for Certification Body services internationally if all Certification Bodies must have a “substantial North American presence.”

Please consider the following for International companies. In this case those with headquarters in Japan.

- **Accept applications from Japanese Certification Bodies**
- **Allow Japanese Certification bodies to perform product specification audits**
- **Allow Japanese Certification Bodies to perform verification and challenge testing**
- **Allow Japanese Certification Bodies to report certified products and data to the EPA**

2. Please consider changes in blue to the following section to clarify Certification Body reporting.

In its current form, the partner is not required to report the same information to the CB as the CB is required to report to the EPA. Please change the two indicated sections so that the information reported is more closely aligned. If this change is made then the last sentence is redundant.

3) ENERGY STAR Verification

b) Re-evaluation in the Event of Significant Changes

i)----- the CB shall:

(1) Require the ENERGY STAR partner responsible for a product the CB has certified to inform the CB about any changes to that product that could result in it no longer meeting ENERGY STAR program requirements.

(2) Require, and evaluate the results of, retesting of the product's relevant performance.

ii) Report to EPA ~~any changes in product performance~~ any changes to that product that could result in it no longer meeting ENERGY STAR program requirements, including new test data.

~~(1) If the changes do not impact the ability of the product to qualify for ENERGY STAR, the CB shall report the relevant data to EPA on the same schedule as information on newly certified products.~~