From: Aaron Gary
To: ENERGY STAR Homes
Subject: FW: Public comment on EPA VOO process
Date: Friday, November 9, 2018 10:28:19 AM

- **Are there any drawbacks to requiring ISO/IEC 17020 accreditation (or becoming a sub-contractor to an accredited organization), such as unreasonable barriers to entry related to cost of accreditation or sub-contracting relationships?**

Transitioning to a ISO 17020 accreditation will requires some initial investment. For Energy Rating companies that are already compliant with RESNET Standards though the investment should be minimal as the RESNET ruleset largely aligns with the ISO Standard. The key difference to me, and where the investment may lay as such, is that RESNET does not have effective oversight in practice on its own internal processes or those of the Energy Rating companies it is supposed to be accrediting. Rating Companies that have maintained high quality internal oversight processes and perform in compliance with RESNET Standards will be able to easily transition to a ISO 17065/17020 platform. Rating Companies that have been more lax in their internal implementation of the required rules will need to invest more. As it is unknown where most companies will fall, developing a 12 month window to fully transition may be appropriate.

RE:/FW: **Aaron Gary** Vice-President of Strategic Initiatives

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