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To:	ENERGY STAR Homes
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If EPA were to decide to eliminate 501(c)(3) or 501(c)(6) non-profit corporation status from the eligibility criteria, should EPA consider allowing previously-recognized non-profit organizations to continue to operate as Verification Oversight Organizations based on the prior requirements for demonstrating impartiality?

EPA should put all VOO participants on the same playing field as soon as the final direction becomes clear to them.

Rationale: It would seem reasonable that the previously recognized (incumbent) VOO could make the small additional effort to qualify as a 17065 Accredited Organization. They have had 25+ years to build systems and processes which they regularly tout as "robust". Based on their public presentation of the strength and quality of their work, adapting to a 17065 framework should not add unreasonable barriers of cost, overhead or performance.

Allowing organizations with wildly different approaches to certifying Rating Companies (17020 or other) … would create unnecessary work and in the long-term divide the industry. This is a necessary one-time step to adjust platform and overall industry direction. But, it is not required for the industry to be divided long term nor is the industry advantaged by having and retaining completely different approaches to certification of professionals or of homes.

For example: The existing certification organizations (RESNET and BPI) have been unable to rationalize acceptance of training and certification methods for new and existing homes … even when the obvious outcome seems like a no brainer to knowledgeable stakeholders. It would be unlikely to expect that new VOO competitors … vying for the same business would be able to form strategic training or certification guidelines for the good of the Rating Community. In short, it seems like an unreasonable burden on the Rating Community to have to navigate two such different oversight and compliance approaches.

Having multiple VOO's with a unified overall methodology (even if everything was not the same) would simplify the process for Rating Companies and the Builder Community. It is time the VOO's offered increased value and time saving for those providing direct service.

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