From: Aaron Gary
To: ENERGY STAR Homes
Subject: Public Comment on EPA VOO Process
Date: Thursday, November 8, 2018 11:52:33 AM

1. Is maintaining ISO/IEC 17065 accreditation an appropriate demonstration that an applicant meets the eligibility criterion for Demonstration of Impartial Governance required for recognition as a Verification Oversight Organization?

Becoming ISO/IEC 17065 Accredited is at least as appropriate a demonstration of Impartial Governance as Non-Profit Status. Looking to an ISO standard carries the additional strength of having codified rules and measurements with which to evaluate the quality of governance and impartiality of the participating organizations.

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

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From: Steve Saunders
Sent: Wednesday, October 31, 2018 12:14 PM
To: ENERGY STAR Public Comment (energystarhomes@energystar.gov) <energystarhomes@energystar.gov>
Subject: Public Comment on EPA VOO Process

1. Is maintaining ISO/IEC 17065 accreditation an appropriate demonstration that an applicant meets the eligibility criterion for Demonstration of Impartial Governance required for recognition as a Verification Oversight Organization?

   There is no perfect test and no perfect way to ensure good governance. All you can do is build systems and push for oversight and transparency. Becoming 17065 Accredited is at least as appropriate a demonstration of Impartial Governance as Non-Profit Status. In that very specific sense, the EPA is getting at least the equivalent and (most likely) even an upgrade in Impartial Governance. Likely, the oversight and transparency of quality 17065 accredited organizations will be a significant step forward. It is important that the long-term requirement is full-accreditation.

Steve Saunders – CEO
Tempo, Inc.

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