

To Whom it May Concern:

I have only one comment that relates to the overall program. If I understand correctly, one of the purposes of this program is to ensure that products appropriately meet the ENERGY STAR requirements. This means that products must be tested using certain test procedures or methods. This also means products will be tested by commercial as well as in-house laboratories (i.e. manufacturer's own laboratory). While you already have the requirement to have all test equipment calibrated by a laboratory accredited to ISO/IEC 17025 by an ILAC recognized accreditation body, I suggest you also include the ISO/IEC 17025 requirements on the testing laboratories. It is critical that the laboratories conducting the tests are technically competent and capable of producing valid test results. I highly encourage the EPA to require that testing laboratories be accredited to ISO/IEC 17025 by an ILAC recognized accreditation body. The methods or procedures as indicated in the Version 3.0 specification should then be required to be listed on the accredited laboratories scope of accreditation. This would mean that the laboratory will be and has been assessed by an ILAC recognized accreditation body against each procedure to determine technical competence and ensuring test results are valid.

Regards,

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