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To: "Passe.Jonathan@epa.gov" <Passe.Jonathan@epa.gov>

Subject: FW: Fw: Reminder: Request for Information - ISO/IEC 17065 Verification Oversight

Dear Jon,

First of all, thank you very much for the opportunity to provide comments to the document that you sent to us.

Here you have our comments.

The scheme owner here is EPA ES, and it is expected that they need to make a prescribed requirement for qualification and experience statement for Certifiers and Surveillance Inspector.

A licenses Engineer/Home Inspector with minimum 5 years of experience in building industry could be most ideal. If such a qualification is NOT insisted by EPA, the CABs could misinterpret and use any Certifier/Inspector with any qualification and experience, and this may end of in a large variation in evaluation principle and methodology.

Use of existing E* CBs already have the QMS elements in place, Verification Oversight Organization (VOO) would be a scope expansion.

Specific answers:

1. ISO/IEC 17065 increases the confidence that E* requirements are being met
2. Existing ISO/IEC 17065 CBs have the framework in place to apply VOO requirements consistently
3. There are no barriers to entry for using a ISO/IEC 17065 CB
4. The benefit include the addition of a process to consistently evaluate conformity
5. ISO/IEC 17065 certification is used by many industries to provide a uniform approach to assessing compliance including, elevator/escalator compliance, food safety, electrical & plumbing products, precast concrete, etc.
6. ISO/IEC 17020 organizations can provide the surveillance for ISO/IEC 17065 CBs, as a subcontractor.
7. ISO/IEC 17020 inspection bodies can verify energy rating using E* criteria
8. A ISO/IEC 17065 CB can have an inspection branch that meets the essential requirements of ISO/IEC 17020 or can subcontract to ISO/IEC 17020 inspection bodies.
9. ISO/IEC 17065 CBs are impartial and are free from the risk to impartiality.
10. The timeline is reasonable.

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