



March 26th, 2012

Ann Bailey
Director ENERGY STAR Product Labeling
U.S. Environmental Protection Agency
1200 Pennsylvania Ave NW MC 6202J
Washington, D.C. 20460

Dear Ms. Bailey,

As an accreditation body that is member of the IAF/PAC MLA for product certification bodies, ANSI has to demonstrate conformance with the ISO/IEC 17011 Conformance assessment – General requirements for accreditation bodies accrediting conformity assessment bodies and also has to use ISO/IEC Guide 65 General requirements for bodies operating product certification systems and scheme requirements to assess the competence of the applicants/accredited certification bodies.

ISO/IEC Guide 65 defines requirements that Certification Bodies (CBs) shall operate at the organization level, including requirements related to certification process, competences of personnel, and confidentiality among others. Requirements specific to an individual product certification scheme such as that for EPA's ENERGY STAR program are established entirely by the scheme owner. During the ANSI accreditation process, ANSI uses the ENERGY STAR program requirements, to assess if the CB is operating its certification process in accordance with ISO/IEC Guide 65 and is certifying specific product models consistent with the relevant ENERGY STAR specifications and related guidance.

As scheme owner for the ENERGY STAR program, EPA is solely responsible for the development of the criteria that products shall be evaluated and certified against. Through the ENERGY STAR product specification, EPA has the prerogative to define the product criteria to be evaluated and reviewed by CBs as well as those that are not to be evaluated and reviewed. EPA can elect to provide explicit direction in its specification that some criteria need not be evaluated. In this case where the scheme owner provides direction to omit criteria, there is no need for the CB to include in its certification documents the criteria that is excluded. Alternatively, EPA could elect to direct CBs not to certify certain product criteria via guidance outside of the specification. In this case, the CB would be required to identify the criteria that were not certified, either on the certificate documents or in another document defined by the CB or EPA.

If you have any questions or if I can be of any assistance please do not hesitate to contact ANSI.

Sincerely,

A handwritten signature in black ink, appearing to read "RBF", is written over a light blue horizontal line.

Reinaldo B. Figueiredo

Senior Program Director Product Certification Accreditation

Cc: Sally Remedios – ANSI Accreditation Committee Chair

Cc: Lane Hallenbeck – ANSI Vice President, Accreditation Services