

05 October 2021

Dr. Stephanie Johnson
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-5B
1000 Independence Avenue SW
Washington, DC 20585-0121

Ms. Amelia Whiting
U.S. Department of Energy
Office of the General Counsel, GC-33
1000 Independence Avenue SW
Washington, DC 20585-0121.

Ref: “Energy Conservation Program for Appliance Standards: Certification for Ceiling Fan Light Kits, General Service Incandescent Lamps, Incandescent Reflector Lamps, Ceiling Fans, Consumer Furnaces and Boilers, Consumer Water Heaters, Dishwashers, Commercial Clothes Washers, Battery Chargers, and Dedicated-Purpose Pool Pumps,” 86 FR 43120, Docket number EERE-2012-BT-STD-0045, RIN 1904-AE90

Dear Dr. Johnson and Ms Whiting,

The TIC Council Americas is pleased to provide comment on the proposed amendments to certification provisions for ceiling fan light kits (“CFLKs”), general service incandescent lamps (“GSILs”), incandescent reflector lamps (“IRLs”), ceiling fans, consumer furnaces and boilers, consumer water heaters, dishwashers, commercial clothes washers (“CCWs”), battery chargers, and dedicated-purpose pool pumps (“DPPPs”). The testing, inspection, and certification (“TIC”) industry looks forward to working with the Department and industry to confirm the function, reliability, and consistency of products.

For your review, we kindly provide the following recommendations through which we aim to further enhance the program:

- In Table II.1, Proposed Certification Reporting Requirements include “Add requirement for declaration that lamps packaged with CFLKs were tested by an International Laboratory Accreditation Cooperation (“ILAC”) accredited laboratory as required under 10 CFR 430.25.” In this case ILAC recognizes accrediting bodies as meeting ISO/IEC 17011 requirements, it does not offer accreditation directly to laboratories.

Recommendation: The TIC Council would recommend revision to the following “Add requirement for declaration that lamps packaged with CFLKs were tested by a laboratory accredited by an accreditation body that is a signatory to the an International Laboratory Accreditation Cooperation (“ILAC”) Mutual Recognition Arrangement (MRA) accredited laboratory as required under 10 CFR 430.25.”

TIC Council is a global association representing over 90 international independent third-party testing, inspection, certification and verification organizations. Testing, Inspection and Certification (TIC) companies cater to a diverse range of industry sectors and a variety

of standards and legislation. The industry represents an estimated one million employees across the world with annual sales of approximately USD 200 billion.

We appreciate the opportunity to give feedback on this proposed rulemaking and look forward to further discussions on this important topic. Should you have any questions, please don't hesitate to contact Karin Athanas at +1 240 762 8069 / kathanas@tic-council.org.

Sincerely,



Hanane Taidi
Director General
TIC Council



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