I am the CEO for On Target Electric . I am writing to comment on the National Lighting Contractors Association of America (NLCAA) application for approval as a lighting control acceptance test technician certification provider. On Target Electric supports certification requirements for lighting control acceptance test technicians. Unlike HERS raters, certified acceptance test technicians are not third party inspectors. Accordingly, it is essential that the certification providers maintain high standards in determining who is eligible for certification and provide for meaningful quality assurance oversight of the technicians.

The NCLAA application raises significant concerns that should be addressed before approval.

- Who is the NLCAA? What is their experience, background, and reputation? Has this organization demonstrated sufficient long term competence and expertise to be authorized by a state agency to train and certify effective and reliable acceptance test technicians?

- What are the testing procedures of the NLCAA? Have their exams been professionally validated for the technical accuracy of the training material? Have tests been validated in regard to bias?

- As a contractor, we are concerned about the sufficiency of the quality assurance program. We are committed to doing high quality work and we want other contractors to do the same. The proposed 1% rate of random field inspections is too low for a program that doesn't require acceptance test technicians to be independent third parties. Furthermore, the NLCAA application does not describe what constitutes a failed audit, or what penalties are imposed for a failed audit. This information should be provided for public review and comment prior to approval of the application. Building departments, schools, and other property owners and managers need to be able to rely on the validity of these inspections. Therefore, it is important that the Provider demonstrate a meaningful quality assurance program.

- The NCLAA application expands prequalification requirements to include professions and degrees that do not provide verifiable, professional experience in lighting control systems, including radio control operators or majors such as philosophy or geology. I urge the Commission to enforce the requirement that all acceptance test technician certification applicants must have at least three years of verifiable professional experience in lighting controls. This should be interpreted as requiring applicants to be in professions that actually design, install, maintain, repair, commission, or test advanced lighting control systems.

On Target Electric is ready to comply with the new Title 24 lighting control acceptance test certification requirements, but urges the Commission to ensure that the certification programs it approves are effective and provide sufficient oversight.

Sincerely,