

April 20, 2007

Ms. Rebecca Duff  
ICF International  
1725 EYE Street, NW, Suite 1000  
Washington, DC 20006

Dear Rebecca:

Follett is pleased that you have included us in the review of your draft ENERGY STAR® proposal for icemakers. We have always strived to produce energy efficient equipment and look forward to being able to participate in this program. However, we have reviewed the current draft of your proposal and we are troubled by your current proposal to exclude nugget ice makers from the initial ENERGY STAR certification program.

As we are sure you are aware, nugget icemakers have advantages over cube type machines in both energy consumption and water consumption. Due to the continuous nature of production, nugget icemakers, including Follett icemakers, use 30-40% less water than cube machines and also operate very efficiently since there is no disruption of the refrigeration cycle.

Concerning the issue of delaying ENERGY STAR for nugget icemakers due to the lack of a substantial database of performance, we have had our icemakers tested to the ARI 810 standards by independent third parties and will be very happy to share this data with you. We have also had independent testing performed that shows there is no performance difference between nugget and cube ice. In addition to the independent work that Follett has sponsored, the California Energy Commission has conducted a substantial investigation into nugget ice and we believe that they are preparing to treat nugget machines in the same manner as cube machines under their regulations that will go into effect January 1, 2008.

We appreciate the fact that there is currently no established ARI standard for nugget icemakers. However, this does not negate the energy efficient nature of these machines. Awarding ENERGY STAR certification to cube type ice machines and not doing the same for nugget machines will penalize these more efficient (especially when the combination of energy and water is considered) nugget icemakers. This would be very unfair to consumers, the environment, and the manufacturers.

We know that you are constantly managing the balance between public policy and fair and equitable treatment of industry, and we appreciate the measures you take in considering all the relevant concerns around an issue. In your further deliberations, please consider that excluding nugget machines from ENERGY STAR would be particularly onerous to Follett since we

manufacture only nugget machines. To be the only ice machine manufacturer unable to offer an ENERGY STAR model will damage our reputation among consumers and make us especially vulnerable in the marketplace.

Thank you for considering these comments. We look forward to continuing the dialogue on this subject and sharing our data with you. If you have any questions, please feel free to contact us.

Very truly yours,

FOLLETT CORPORATION

A handwritten signature in black ink, appearing to read "Steven R. Follett". The signature is written in a cursive style with a large initial "S" and "F".

Steven R. Follett  
President and CEO

c: Rachel Schmeltz