

Honeywell
P.O. Box 1053
Morristown, NJ 07962-1053

June 20, 2007

Mr. Richard Karney
ENERGY STAR Products Manager
United States Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Karney:

Thank you very much for hosting the stakeholder meeting in Washington DC on June 4th, 2007. We found the meeting to be a terrific opportunity to hear industry feedback on the proposed improvements to ENERGY STAR criteria for standard refrigerators; namely, raising the minimum ENERGY STAR criteria for standard refrigerators to 20% more efficient than the Federal standard from the current criteria of 15% better than the Federal standard with an effective date of April 1, 2008.

The Honeywell representatives in attendance left the stakeholder meeting more convinced than ever that the United States Department of Energy's proposed increase in energy efficiency standards with an effective date of April 1, 2008 is both technologically feasible and represents a meaningful improvement to energy efficiency in our country.

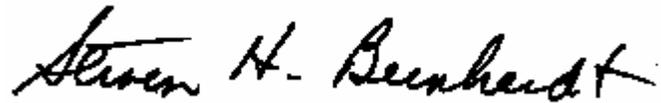
There was robust discussion at the stakeholder meeting as to whether an April 1, 2008 effective date was realistic. As a major supplier of a critical energy efficiency enabler—namely, foam insulation blowing agents—Honeywell has significant experience in assisting the consumer refrigerator and freezer industry to achieve energy efficiency standards within tight deadlines.. Based on our industry knowledge, Honeywell is confident that an April 1, 2008 deadline is achievable by a large number of manufacturers. Specifically, using better insulation alone, we are aware that several OEMs will be able to upgrade the energy efficiency of their current refrigerator offerings to meet the new standards with zero or very small capital expenditures and negligible operating cost impact.

We are also aware of other OEMs who claim that improving the energy efficiency of their current refrigerator models could take longer than nine months. Honeywell believes that to delay the implementation of the proposed change past April 1, 2008 is not only unfair to both consumers and those manufacturers who have been in the vanguard of developing more energy efficient appliances, but it will also send the wrong message to everyone in the industry. Furthermore, it is important to remember that participation in the ENERGY STAR program is voluntary—not a mandatory regulatory scheme. The April 1, 2008 deadline will provide appropriate incentives for the white goods industry to develop and adopt more energy efficient technologies without being punitive to those manufacturers who may not be able to meet the exact deadline but will be in a position to introduce new, more efficient models soon after April 1, 2008.

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Honeywell very much appreciates the opportunity to comment on the proposed change in the minimum ENERGY STAR criteria for standard refrigerators models.

Yours truly,

A handwritten signature in black ink that reads "Steven H. Bernhardt". The signature is written in a cursive style with a horizontal line underlining the first name.

Steven H. Bernhardt, Ph.D.
Global Director Regulatory Affairs
Honeywell Chemicals