

We are a small business and have been a proud ENERGY STAR Partner for many years. The program is important to our industry and we support efforts by EPA and DOE to improve the ENERGY STAR program.

We urge EPA and DOE to continue efforts to align program requirements with Department of Energy Standards, to help reduce the burden on manufacturers and increase participation in the ENERGY STAR program.

Confidence in published ratings is crucial for ENERGY STAR, as well as for DOE's CCMS data base, where violations are subject to legal action and penalties.

Third-Party Certification should not be required for ENERGY STAR qualification in product categories where DOE has a robust certification and enforcement program in place, such as Commercial Refrigeration Equipment.

Third-Party Certification adds significant cost and time burden to qualify each basic model. Participation in a voluntary marketing program like ENERGY STAR should not be more burdensome than meeting nearly identical standards for Federal Regulatory requirements.

Removing the additional burden of Third-Party Certification will increase participation in the ENERGY STAR program and particularly benefit small manufacturers, with very limited resources to meet multiple regulatory requirements.

Thank you for your consideration of these comments.

Jeff Bauman, Engineering



539 Dunksferry Road
Bensalem, PA 19020
Office (215) 244-1400
Direct (267) 525-3256
Fax (215) 244-9579
jbauman@nrac.com
www.continentalrefrigerator.com
www.nationalcomfortproducts.com