



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
WASHINGTON, D.C. 20460

OFFICE OF AIR AND RADIATION

Climate Protection Partnerships Division  
U.S. EPA 6202J  
Washington, DC 20460

January 24, 2011

To All ENERGY STAR Modular Home Plant Partners:

We value your partnership and the work you do to promote greater energy efficiency. As a Partner in the ENERGY STAR program you are permitted to use the ENERGY STAR name and marks in a specific form and manner as set out in our Identity Guidelines. However, because modular home plants do not typically sell directly to the home buyer there are some unique challenges in how plants can promote their participation in ENERGY STAR. In order to protect the value and public trust in the ENERGY STAR brand, it is important that the use of the ENERGY STAR name and marks in your marketing and sales materials closely adheres to our guidelines. The purpose of this letter is to clarify the Identity Guidelines with respect to how you can use the ENERGY STAR name and marks in connection with the ENERGY STAR Modular Home Program.

The Identity Guidelines (available at: [www.energystar.gov/logouse](http://www.energystar.gov/logouse)) describe appropriate uses of the ENERGY STAR name and marks, which are federally registered. These guidelines must be adhered to by any entity using the ENERGY STAR marks in any marketing, outreach, and public education efforts.

**The following four guidelines are provided as a reminder:**

- 1. The ENERGY STAR marks may never be associated with products, homes, or buildings that do not qualify as ENERGY STAR.** The ENERGY STAR name and marks cannot be used to imply that any product, service, or organization has met ENERGY STAR performance criteria when it has not. Also, the ENERGY STAR marks are not to be used in advertisements featuring non-qualified homes or on promotional materials or adjacent to a non-qualified home or a home not yet constructed and properly rated as meeting ENERGY STAR performance criteria. A home must earn the ENERGY STAR label before it can be promoted as a home that is designed, built, constructed, manufactured, qualified, certified, labeled, or produced as ENERGY STAR or that otherwise meets or exceeds ENERGY STAR standards, guidelines or requirements. Promoting modules as homes that are "designed to be ENERGY STAR labeled" or "built to meet ENERGY STAR requirements" is not appropriate since their qualification depends on additional activities performed outside the plant. Moreover, when promoting ENERGY STAR qualified homes, promotional materials should direct purchasers to the official web site for additional information. Examples of appropriate language to use in promoting ENERGY STAR qualified modular homes include:
  - You can request your local builder to order from our catalog of modules and build your home to meet ENERGY STAR requirements. Learn more on how a home qualifies for the ENERGY STAR label at [www.energystar.gov/homes](http://www.energystar.gov/homes)
  - Homes built with our modules and verified to meet strict guidelines for energy efficiency can earn the ENERGY STAR label. Learn more on how a home qualifies for the ENERGY STAR label at [www.energystar.gov/homes](http://www.energystar.gov/homes)

- We design and produce modules that, when assembled properly on-site by a local builder, and are third-party inspected, may earn the ENERGY STAR label. Learn more on how a home qualifies for the ENERGY STAR label at [www.energystar.gov/homes](http://www.energystar.gov/homes)
- Our authorized builders use our modules to construct homes that may earn the ENERGY STAR label. Learn more on how a home qualifies for the ENERGY STAR label at [www.energystar.gov/homes](http://www.energystar.gov/homes)

Unless you sell your product directly to the home buyer and are responsible for all ENERGY STAR-related features of a home, including the final inspection by a third-party home energy rater, you can not directly or indirectly claim to design, build, or construct ENERGY STAR qualified homes. All marketing and promotional materials, including websites, brochures, catalogs, and yard signs must accurately and clearly reflect your role in providing a home to a homebuyer that earned the ENERGY STAR label.

Enclosed are descriptions of the ENERGY STAR marks and how each can be used. The ENERGY STAR Certification Mark can only be used to identify homes that have already been qualified for the ENERGY STAR label. Also, organizations can not use the "We Sell" Linkage Phrase mark unless they sell ENERGY STAR qualified homes directly to consumers, i.e., the home buyers.

2. **EPA must approve any educational or promotional campaigns that feature the ENERGY STAR name or mark prior to final production or printing.** You can request EPA review of your promotional or educational materials by contacting us at [energystarhomes@energystar.gov](mailto:energystarhomes@energystar.gov).
3. **Partners and other authorized organizations are responsible for their own use of the ENERGY STAR marks, as well as use by their representatives such as ad agencies.** Modular home plants are responsible for the use of the ENERGY STAR marks by their authorized or approved builders (unless they are also ENERGY STAR partners).
4. **EPA actively monitors proper use of the ENERGY STAR name and marks.** Entities violating our Identity Guidelines are contacted in writing or by phone. Failure to adhere to our Guidelines may result in termination of your ENERGY STAR participation.

We value your input on these clarifications. If you have any questions concerning our Identity Guidelines or the ENERGY STAR qualified modular home program please contact us at [energystarhomes@energystar.gov](mailto:energystarhomes@energystar.gov).

We thank you for reviewing and adhering to our Identity Guidelines and helping us maintain the integrity of the ENERGY STAR brand.

Sincerely,



Sam Rashkin  
National Director  
ENERGY STAR for Homes

Enclosure: Descriptions of ENERGY STAR marks