



April 30, 2010

ENERGY STAR

Attn: Commercial Foodservice Equipment Program  
1200 Pennsylvania Ave. NW.  
Washington, DC 20460

The recent proposed program changes to the ENERGY STAR program, the Enhanced Testing and Verification initiatives, are quite concerning for AccuTemp Products, Inc., a small manufacturer of commercial foodservice equipment in Fort Wayne, IN. We provide two types of products to the industry – steam cookers and griddles. We qualified our steam cookers to the new ENERGY STAR category at its inception in August 2003. We were the first and only griddle manufacturer qualified for the griddle category at its inception in May 2009. All of our standard products are ENERGY STAR qualified, using combinations of third-party and self-certification test results. We sell our products as all ENERGY STAR qualified. It is a key going-to-market strategy that has served us and our customers well.

But the prospect of losing the ability to complete self-testing for qualification of our products will be devastating to our company. The potential cost and schedule impact is extremely significant to us. As a member of the ASTM (American Society for Testing and Materials) F26 Food Service Equipment Committee, I have recently participated in many discussions regarding these proposed program changes. AccuTemp Products, Inc. strongly encourages the ENERGY STAR program to find ways to allow honorable companies that respect and support this energy-conservative product recognition to retain the ability for self-testing.

Potential key facts to consider for ensuring the ENERGY STAR brand is protected while allowing manufacturers to flourish with the ENERGY STAR mark are:

- 1) Make program enhancements that minimize the extreme third-party testing costs for multiple product model listings that will cost \$5,000 to \$15,000 per model, depending on the product and testing complexity.
- 2) Avoid the schedule delays that we surely occur due to current inadequate capacity in the industry for product-knowledgeable third-party testing facilities to become available or once available to meet the huge demand for laboratory test time.
- 3) Recognize that most manufacturers already have capable test facilities in-house that complete self-testing tasks today. With some improved guidance for test



equipment and calibration guidelines, test procedures, reporting templates, and lab certification, the self-test data can be judged as reliable data for product qualification.

Some potential steps have been developed through the recent ASTM discussions, which will be presented in more formal presentations in the future by ASTM and NAFEM (North American Association of Food Equipment Manufacturers) jointly, are as follows:

- 1) Allow self-testing by manufacturers to continue, with some simple testing and reporting improvements, until the final program enhancements are released and implemented.
- 2) Create a test laboratory qualification process that will ensure consistent and verifiable results from any qualified test laboratory.
- 3) Identify an ENERGY STAR representative organization (ASTM has a certification program in place that could be an excellent option as the ENERGY STAR representative organization) that is responsible for periodic product performance verification.
- 4) Allow product verification using product documentation where appropriate, similar to existing safety and sanitation certification organization procedures.
- 5) Utilize fines for manufacturers who falsify test results in order to qualify products to the ENERGY STAR requirements.
- 6) Create a challenge process, where the challenge loser (challenger or manufacturer) pays all costs for that challenge activity.
- 7) Allow existing qualified products to remain qualified until the test laboratory qualification process and ENERGY STAR representative organization have been established and operational. At that time, the existing qualified models can be re-qualified to the new enhancement program process, completing the cycle for all ENERGY STAR qualified products.

I know that the ASTM F26 Food Service Equipment Committee is very willing to work collaboratively to find a mutually-compatible process that strengthens and protects the ENERGY STAR brand while serving the needs of this industry that has been very supportive of ENERGY STAR program. We should not penalize the whole program because of the abuses by a small fraction of the partners or the recent GAO investigation. We should improve the program so that the public can be confident of its symbolism. The ENERGY STAR is a powerful brand that needs continuous improvement, just like any other process or procedure, not radical surgery.

AccuTemp Products, Inc. remains a strong supporter of the ENERGY STAR program. We need it to thrive for our business benefit as well as the energy conservation impact



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to our society. We await the next steps that present themselves to move forward more positively.

Sincerely,

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AccuTemp Products, Inc.

ASTM F26.02 Cooking and Warming Equipment Subcommittee Chairman

cc: The Honorable Richard Lugar  
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The Honorable Evan Bayh  
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