



CROWN BOILER COMPANY

P.O. BOX 14818 • 3633 I STREET • PHILADELPHIA, PENNSYLVANIA 19134
PHONE (215) 535-8900 • FAX (215) 535-9736 • WWW.CROWNBOILER.COM

April 30th, 2010 (via email)

Ms. Kathleen Vokes
Energy Star Product Development Team
US Environmental Protection Agency
1200 Pennsylvania Avenue NW (Postal Code 6202J)
Washington DC 20460

Re: Energy Star Enhanced Testing and Verification Program

Dear Ms. Vokes,

The purpose of this letter is to comment on EPA's current efforts to tighten qualification and verification requirements for products entering the boiler and furnace programs. Crown Boiler Company agrees with EPA that more stringent requirements are needed for adding, and maintaining, product listings in these programs than those that were previously enforced. As a manufacturer who has always endeavored to generate, and advertise, efficiency ratings in strict accordance with applicable Federal rules, we believe that EPA has an obligation to ensure that all Energy Star partners do the same.

I participated in both the March 26th (general) and March 29th (HVAC) Webinars on this subject and was also glad to hear you acknowledge AHRI's existing efficiency certification programs. These programs have a long history and wide acceptance throughout the HVAC industry and among regulatory agencies including the US Department of Energy and the California Energy Commission. The existing AHRI residential boiler program includes rigorous qualification requirements for models entering the program, in addition to annual verification requirements. AHRI is also in the process obtaining Standards Council of Canada (SCC) accreditation of its certification programs to ISO/IEC Guide 65, *General Requirements for Bodies Operating Product Certification Systems*.

In light of this, we believe that the imposition by EPA of qualification and/or verification testing requirements beyond those in the AHRI residential boiler and furnace programs would have negligible benefit to the consumer, impose an undue regulatory burden on the manufacturer, and an unnecessary enforcement burden upon EPA itself. I would therefore urge EPA to adopt a policy that permits any product which is listed in the AHRI directory, and which has an efficiency descriptor meeting the appropriate Energy Star threshold, to automatically qualify for participation in the Energy Star Program. If this is done, however, we do think it imperative that EPA put a mechanism in place to ensure that such participation is contingent upon the subject product remaining in the AHRI program with the appropriate efficiency rating.

Sincerely,

Paul Sohler
Director of Engineering