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Ms. Kathleen G. Vokes  
U.S. Environmental Protection Agency  
Climate Protection Partnership Division  
ENERGY STAR Program  
1200 Pennsylvania Ave. NW.  
Washington, DC 20460

Dear Ms. Vokes:

After review of the EPA's proposal for the commercial food service equipment, specifically commercial dishwashers, we have multiple concerns regarding the phase-in and short term goals expressed by the EPA during conference calls in March and April.

We have supported the EPA's ENERGY STAR program since its inception and in prior years we were in favor of and worked on developing the standard for commercial warewashing equipment.

That being said, we are extremely concerned about the requirement for third-party laboratories to certify and verify qualifying products, the potential costs associated with a third party program and the impact to small business (such as ourselves). Our typical models are offered in three voltages (208V, 240V and 480 V) for electric powered equipment, natural or propane fuel for gas heated equipment and with steam coils or injectors for steam heated units. Based on the EPA requirements to test each variation of the product, a series of up to seven tests may be needed for each model and capacity of equipment. Statistical validation of results required by ASTM procedures will typically cost \$35,000 to \$55,000 per model for an external (third party) test program when including the cost of equipment, raw materials, shipping and test labor.

Our equipment is typically heavy, large, expensive, made to order, and low production volume when compared to consumer products. The logistics of managing the fabrication of test units and then shipping them are additional fixed costs and when compounded over multiple products, this level of cost will not justify participation in ENERGY STAR programs for most models, thereby causing disadvantage to small businesses and limiting our ability to compete.

Additionally, commercial warewashing equipment is tested for water consumption by NSF and the additional testing for idle energy usage becomes an overbearing cost. Developing data logging requirements and submission of these computer generated results along with a calibration certification should suffice for verification of idle energy usage.

Sincerely,

A handwritten signature in black ink that reads "John A. Stern". The signature is written in a cursive, flowing style.

John A. Stern  
President  
Insinger Machine Company, Inc.