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To: ENERGYSTARVerificationProgram@energystar.gov
Subject: Enhanced Testing and Verification: Commercial Food Service Equipment

InterMetro appreciates the opportunity to comment on the enhanced testing and verification proposals. We believe there are significant differences between commercial food service (CFS) equipment and consumer products covered under the Energy Star program. CFS equipment tends to be large, heavy and expensive, sometimes made to order or custom made, with significantly lower production volume than consumer products. Shipping CFS equipment around the country to independent test labs is very expensive in both shipping costs and equipment costs (tested product cannot be sold as new product because it never comes back in original condition). Unfortunately, we cannot spread these costs over large numbers of product. Additionally, we are not aware of any abuses of the Energy Star voluntary program in commercial food service equipment as there has been in consumer products.

InterMetro is concerned about the need for third party laboratories to qualify and verify commercial food service products. We do our Energy Star tests for Commercial Hot Food Holding Cabinets in-house, using calibrated equipment and the required ASTM F2140-01 test method. We are approved as a Generic Test Laboratory by the California Appliance Efficiency Program. We suggest a similar certifying program for the Energy Star program. Doing the tests in-house allows us to keep costs down and meet tight schedules. Many other CFS manufacturers do their Energy Star testing in-house. InterMetro Industries currently uses the following Nationally Recognized Test Labs (NRTL) for various product safety testing and accreditation: UL, NSF, CSA and MET Labs. However, Energy Star testing is not safety related. Forcing manufacturers to ship large CFS product around the country for testing will be expensive and time consuming. The NRTLs are not fast to turn around test requests and forcing manufacturers to use them instead of in-house test facilities will slow down product introductions. We have invested the resources to be able to do our Energy Star testing in-house and we believe we should have the option to continue to do in-house testing without a witness required from an NRTL. Forcing us to use third party test labs (or their witness) for non-safety testing will add costs and delay submittals to Energy Star and may discourage some manufacturers from pursuing Energy Star listing, thus making the new proposals unsuccessful.

Spot checks, or "off the shelf" testing, can be done by third parties to keep manufacturers honest and to test for products that do not meet the Energy Star requirements. Stiff fines should be imposed on manufacturers that falsify test results to get their products listed as Energy Star compliant. If there is reasonable doubt about published data from a manufacturer, challenges should be conducted by independent, third party facilities with the "loser" of the challenge paying the cost.

Thank you for the opportunity to comment.

Sincerely,

Willard Sickles, P.E.
Manager, Product Safety and Compliance Engineering

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Product Manager, Foodservice Division

