



FRIEDRICH  
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July 20, 2010

TO: Ann Bailey, Chief  
ENERGY STAR Labeling Branch  
U.S. Environmental Protection Agency

RE: Manufacturer partners input of EPA Draft memoranda of Conditions and Criteria for Recognition of Certification Bodies for the ENERGY STAR Program.

Dear Ms. Bailey,

Friedrich understands from the memoranda that EPA is interested in requiring manufacturer partners across all eligible categories to have their ENERGY STAR products third party certified by an EPA-recognized Certification Body (CB). It is Friedrich's opinion the current AHRI and AHAM programs in place today already serve consumers in providing third party verification. Friedrich understands why EPA would be interested in verification testing for products where no certification program is in place. But since Friedrich, and other air conditioning manufacturers participate in AHRI and AHAM certification programs where product is randomly selected, tested then verified by a third party (i.e. ITS/ETL), we do not understand the necessity to replace the current programs. This practice has insured that when we have a quality product, we can get the product to our customers without delay and added cost.

Friedrich understands from the memoranda that EPA's impetus for the change is to preserve consumer confidence in the ENERGY STAR label. Friedrich is not aware of any lack of consumer confidence regarding ENERGY STAR in air conditioning products certified by AHRI or AHAM. It is Friedrich's opinion that these current certification programs are already accomplishing the EPA's goal, and is doing so without added substantial cost to our government, consumers, and air conditioning manufacturers.

For products not having existing certification programs in place today, Friedrich believes certification programs like AHRI and AHAM should be extended to include such products. Also, if EPA is aware of deficiencies in existing certification programs, the deficiencies, in our opinion, should be corrected to strengthen existing programs.

If EPA is determined to make the changes mentioned in the memoranda, we are unclear of the impact to Friedrich, and if we will be able to list product with ENERGY STAR in the proposed time line for 2011. For a major shift affecting multiple industries, two years minimum (2013) is a more practical timeline and would better allow for all industries and partners to make major transitions. Thank you for the opportunity to comment.

Sincerely,

W. Patrick Kendrick  
Product Engineering Administrator  
Friedrich Air Conditioning Co.

Cc: David Lingrey, Ed Wuesthoff,  
Kevin Eicher, T. J Wheeler, Heath Hoselton