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June 25, 2010

Ms. Ann Bailey  
US EPA  
ENERGY STAR  
1200 Pennsylvania Ave NW  
Washington, DC 20460

Re: Draft Certification and Verification Requirements

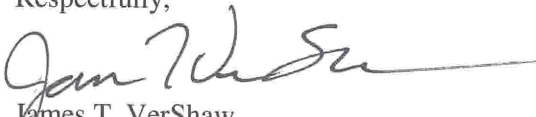
Ingersoll Rand Residential Solutions, manufacturer of Trane and American Standard residential heating and air conditioning products, appreciates the opportunity to comment on the EPA's Draft Certification and Verification Requirements for ENERGY STAR products. We recognize the value that the robust qualification and verification processes that we have in place today brings to our business and our industry. This process includes the AHRI efficiency certification programs along with design certification to UL and ANSI standards. A close look at the details of these processes reveals that all of the requirements that are listed in the EPA Draft are in place. These include manufacturer labs that are approved and audited by an independent third party using ISO 172025 for qualification testing, verification testing of products from inventory at an independent ISO 17025 laboratory with penalties for failures and a challenge process, and critical design change approval by a third party. The ARHI efficiency certification process also includes reporting to the DOE and FTC.

Since the current requirements for other US agencies are similar to the EPA requirements, and there are processes in place for those agencies, Ingersoll Rand urges the EPA to work with the DOE, FTC, and AHRI to develop a single qualification and verification system to be used for all. Such an approach would create a common database giving all agencies the same data at the same time which reduces the possibility for errors as well as reduces the burden on the industry.

Critical to the single system is the adoption of the DOE basic model group definition and rating process that allows the use of a combination of testing and simulation. Simulation would be carried out using a DOE approved "alternate rating method" tuned to the results of the tested basic model system. This is critical for residential split system HVAC equipment since there a very large number of possible combinations of indoor and outdoor units. Today, Ingersoll Rand has 96,127 active listings of air conditioners and heat pumps in the AHRI directory. Of these, 37,674 are ENERGYSTAR systems. Numbers such as these make testing of every system combination impossible. The AHRI verification process insures that one third of our basic models are tested yearly and while doing so can test any of our 96,000+ combinations.

In summary, Ingersoll Rand urges the EPA to work with DOE, FTC, and AHRI to create a single, comprehensive qualification and verification process. We believe that a robust process that meets the requirement of the regulators and the manufacturers can be accomplished.

Respectfully,

  
James T. VerShaw  
Chief Engineer

