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InterMetro appreciates the opportunity to comment on the EPA "Draft Certification and Verification Requirements." We believe the present Energy Star program for commercial food service (CFS) equipment, with a few modifications, will go a long way to preserve consumer confidence in the ENERGY STAR label and protect the significant value it offers program partners. The required use of Certified Bodies for qualification testing only adds cost, time and additional overhead (in the form of paperwork) to a system that works well for CFS equipment.

Commercial Food Service equipment is tested to ASTM or AHRI standards. The use of those standards, and the following additions, should be enough to ensure honest test data and Energy Star submissions from either the manufacturer's test lab or a third-party test lab.

1. Test reports shall be submitted with witness signature and countersigned by an officer of the company for authenticity. Authentication by a company officer demonstrates a serious commitment by the manufacturer to prevent false reporting.
2. All test labs (either a manufacturer's test lab or a third-party test lab) shall keep on file:
 - a. a list of all equipment used and listed in the relevant ASTM or AHRI test procedure standard
 - b. qualifications and training of personnel (relative to the test conducted)
 - c. calibration data (traceable to NIST) of each piece of equipment identified in the relevant ASTM or AHRI test procedure standard

Regarding the verification of "at least 10% of all Energy Star qualified base models per year," InterMetro Industries believes this is too burdensome to CFS equipment manufacturers. Most food service equipment designs do not change as frequently as consumer products do. We have had products that were 17 years old without any modifications that affected energy use. InterMetro Industries is an ISO 9001 registered organization and has two inspections yearly to insure quality and good manufacturing practices throughout the company. InterMetro products are UL Listed, CSA Certified and/or NSF Listed. UL and CSA inspect our facilities four times a year. NSF inspects our facilities annually. Part of the inspection process is to ensure we have not changed processes, and that we build our products to the proper specifications and perform the proper quality, performance and safety tests. All CFS equipment manufacturers are subject to this scrutiny for their listed products. Yearly verification of 10% of CFS products is not necessary.

If third party labs and Certified Bodies are required for qualified testing, we believe many small to medium sized partners will decide participating in the Energy Star program no longer provides any return on investment and will therefore drop out of the program.

The Challenge Testing procedure is a good addition to the Energy Star program. For this program, InterMetro Industries believes the use of a CB is necessary to ensure impartial and fair treatment of both parties involved.

Sincerely,

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