

May 28, 2010



F R I E D R

Kathleen Vokes  
ENERGY STAR Product Development  
Environmental Protection Agency  
1310 L Street, NW  
Washington, DC 20005

Dear Ms. Vokes,

Re: Comments on "Draft Conditions and Criteria for Recognition of Laboratories for ENERGY STAR Program"

The following are Friedrich Air Conditioning company's comments to the proposal letter released May 17, 2010, "Draft Conditions and Criteria for Recognition of Laboratories for the ENERGY STAR program".

Friedrich Air Conditioning has concern with the proposal mandating the use of third party accredited laboratories for qualification of products desiring to use the ENERGY STAR label. Our company has our own laboratories that allow us to certify and rate our products accurately and effectively in compliance with UL supervised manufacturer testing (SMT) methodology and to industry test standards. We feel that this method is efficient, cost effective and accurate and affords us the greatest flexibility in meeting market demands.

Friedrich Air Conditioning is a member in good standing with the Association of Home Appliance Manufacturers (AHAM) and Air Conditioning, Heating and Refrigeration Institute (AHRI). As a member of these organizations' we certify our products for operating performance and efficiency using the test and verification standards that have been in use for many years for Room Air Conditioners and Dehumidifiers. The certification programs are administered and overseen by AHAM and AHRI and validated at third party National Accredited Testing Laboratories (NRTL) through a system of annual random product selections and audits. The test results are unambiguous and impartial, without companies having undue influence over the results. Companies are also allowed to anonymously challenge other manufacturer's product performance ratings. This current system is robust, cost effective and efficient and provides value to our customers. Through the annual product certification audit process our internal labs are audited and test results are correlated to the NRTL results with great effectivity.

Friedrich Air Conditioning supports and understands the need for verification testing programs as it allows consumers to have confidence in the stated performance ratings. But we do not support or endorse methods that will add cost, additional levels of bureaucracy, duplication of effort and lengthened product development schedules all without adding value to our customers.

While there is a need for verification testing for products where no certification program is in place such as with washers and driers. The wholesale mandate for implementing third party testing for products where an effective system is in place is not justified. The needs of the particular industry must be understood prior to instituting changes that are burdensome. We feel that the use of Industry

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consortium agencies such as AHAM and AHRI to prepare test standards, while administering, monitoring and operating certification programs is the best method in validating performance requirements effectively. We feel that the EPA should advise AHAM and AHRI what is desired and necessary while allowing the industry to prepare the means for its implementation.

As a small manufacturer, Friedrich relies on AHAM and AHRI certification programs to provide an invaluable service for listing and verifying room air conditioner product performance. The values contained within the certification program are also the published values we have used in the past for the ENERGY STAR program. These certification programs have also assisted manufacturers in reporting product listings to the many Federal and State institutions, and have helped streamline the reporting requirements.

By participating in AHRI and AHAM programs, small manufacturers like ourselves have not had to invest substantial capital in maintaining laboratory resources. Products tested by the third party certifying agency are often retained for correlation testing and validation of our test facilities, without having to pay for additional special testing. This practice has assisted our lab facility in establishing similar test results, which has provided accurate and prompt product development. Unchanged, the AHRI and AHAM certification programs in our opinion are good programs for validation of ratings.

Despite business and engineering challenges facing us, Friedrich continues to work very hard in taking a leadership role in achieving high energy efficiency performance levels on all of our products. We feel it important in ensuring products meet their stated ratings. Friedrich stands behind the AHRI and AHAM certification programs as the best vehicle serving consumers through validating product efficiency levels and policing product listings. These same programs have also done so without substantially adding to the manufacturer's product development cost for repetitive evaluation. If changes are to occur, we would like to see AHRI and AHAM's position strengthened to facilitate any new requirements.

We recognize that ENERGY STAR is a voluntary program, and if the program is changed to become financially burdensome and bureaucratically complex, we may elect to discontinue using the ENERGY STAR mark while still maintaining industry leading product efficiencies thereby obfuscating the worth of the program.

Sincerely,

A handwritten signature in black ink, appearing to read 'David J. Lingrey', with a large, sweeping flourish extending to the right.

David J. Lingrey  
Vice President Engineering