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October 29, 2010

Maria Vargas
US Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

RE: Top Tier ENERGY STAR® Qualified Products

Comments:

GeoSystems, LLC would like to address the proposed Top Tier program for ENERGY STAR® Qualified Products. As a manufacturer of geothermal heat pumps, GeoSystems has many products that are ENERGY STAR® qualified. GeoSystems supports the movement of ENERGY STAR® to provide consumers with confidence that ENERGY STAR® products are delivering the savings they expect.

Our comments are as follows:

Geothermal heat pumps are unique in that they would cross over into two categories, both the Central Air Conditioners, and the Heating equipment Categories. Geothermal heat pumps have long been recognized as leaders in providing the most efficient combination of heating and cooling equipment, combined with water heating in many cases, available today in a single system for single and multiple family unit dwellings. Comparing these multi-function units with single function units is not a true apples to apples comparison.

Most recently, new ENERGY STAR® standards were adopted which pushed geothermal heat pump levels of performance even higher. These standards will have changed three times from 2009 through 2012, leading geosource heat pump manufacturers to continuously develop more efficient units to meet those standards.

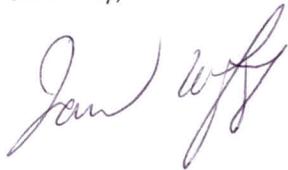
As the final standard is to be enacted on 1/1/12, many companies, like our company, are continuing to develop equipment to meet and exceed the highest, Tier 3, standards. We, along with our competition, will continue to release new models at an ever-increasing pace well past the 1/1/12 date.

The other appliances listed in the proposed program are in very mature industries as evidenced by the number of manufacturers / brands and the number of units available at multiple price points. By contrast, the geothermal heat pump industry is just in its infancy as evidenced by its market penetration into the overall HVAC industry (approx. 1.5%), the fewer number of manufacturers and models, and rapid rollout of models in the last 18 months and the next 24 months to come in order to meet the Tier standards.

Additionally, traditional heating and air conditioning products are simply plugged into existing standardized power and fuel sources which are controlled by a known set of utilities; thus there are no operational factors outside of the product to influence its performance. With geothermal heat pumps, the situation is quite different as the customer's realized efficiency is a combination of the equipment efficiency coupled with the efficiency of the ground loop which can vary in every installation based on the installer and ground conditions.

We believe this program, while it may be appropriate for many home appliances in mature industries, would not be a benefit to our industry that is rapidly evolving and maturing and could potentially cause confusion with consumers.

Sincerely,

A handwritten signature in cursive script, appearing to read "James Wiff".

James Wiff
Director of Engineering
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