I have 2 comments on the proposal:

1. The key comment is that the designation must be part of the logo. Place the designator (“Super Star”, “Top Performer”, “Most Efficient”, “Best in Class”), above or below the Energy Star Logo. Something like what is shown below… By having the “Super Star” in the same color and the same font, it appears to be part of the energy star logo. By stating “top performer” or something else above the logo, those techniques visually don’t appear to be part of the Energy Star designation. It becomes confusing as to whether it is the EPA making that statement or whether it is the product manufacturer making the designation. By adding it to the logo, there is no confusion as to whose statement it is…

Trust me, Marketing people will abuse the green “Top Performer” indication. To get around the logo requirements, I would put “Best Performer” in black above the energy star logo to make it look like I have made the top tier of energy savings equipment. It’s too easy to abuse. By including the designation in the logo as shown above, there is no confusion. Of the 3 below, which would people assume is the EPA approved logo? I would bet the one with Super Star on top would be the one that everyone would agree is most likely the real one… And in the end, all you really want is for consumers to understand that they are getting the most power efficient product in the market. If you are going to extend the brand, then extend the logo to match… 😊

2. The second comment is not specific to this proposal but is generic for all government documents. In the “Target Audience” section, the document highlights different ethnic groups. However, the first group listed is “white”. That’s a color, not an ethnic group. Euro-American is what I think most people mean. Can’t we get away from using color and start using their actual ethnicity?

That’s it.
Thanks!
Dale…