



October 29, 2010

Maria Vargas
Energy Star Program
United States Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, DC 20460

Sent via E-mail: vargas.maria@epa.gov

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Re: TechAmerica Comments on a proposed “Top Tier” ENERGY STAR Program”

Dear Ms. Vargas:

TechAmerica is the leading voice for the U.S. technology industry, which is the driving force behind productivity growth and jobs creation in the United States and the foundation of the global innovation economy. Representing approximately 1,200 member companies of all sizes from the public and commercial sectors of the economy, it is the industry’s largest advocacy organization and is dedicated to helping members’ top and bottom lines. It is also the technology industry’s only grassroots-to-global advocacy network, with offices in state capitals around the United States, Washington, D.C., Europe (Brussels) and Asia (Beijing). TechAmerica was formed by the merger of AeA (formerly the American Electronics Association), the Cyber Security Industry Alliance (CSIA), the Information Technology Association of America (ITAA) and the Government Electronics and Information Association (GEIA).

Many of our members are designing and manufacturing the technologies that support improvements in energy efficiency across the supply chain and within the information and communication technology sector itself. We are interested to work with the ENERGY STAR program as it seeks to bring higher levels of energy efficiency to the consumer market.

TechAmerica is pleased to offer the following comments in response to EPA’s request for feedback on “a proposed new program element to identify and advance highly efficient products in the marketplace.” While we broadly support the aims of the ENERGY STAR program, TechAmerica remains concerned that a “Top Tier” ENERGY STAR approach, particularly if it were to be broadly

applied across a full spectrum of products, has the potential to produce consumer confusion in the marketplace.

ENERGY STAR is a simple and effective means for consumers to identify energy efficient products on the market. It is our concern that a “top tier” program may inadvertently tell consumers that “lower tier” ENERGY STAR products are not valuable in terms of the energy efficiency benefits they provide.

Secondly, given the challenges Energy Star faces in other aspects of the program, e.g., developing more sophisticated and meaningful measures of energy efficiency, ensuring that standards are developed for new products and existing standards are updated where there is potential for driving greater energy savings, TechAmerica believes that EPA and DOE’s resources may not be best spent developing an additional top tier ENERGY STAR approach.

TechAmerica is concerned that EPA and DOE resources may be constrained from achieving existing program goals if a top tier ENERGY STAR approach is added. Expanding the current program’s effectiveness should be a higher priority than expanding its scope to include a top tier level.

We are aware that others in the tech industry have additional concerns, but this letter outlines two of the most important concerns for TechAmerica’s membership.

Thank you for reviewing TechAmerica’s comments on the “Top Tier” proposal for the ENERGY STAR Program. Please let us know if you have any questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Phillip Bond", with a stylized, cursive script.

Phillip J. Bond
President and CEO
TechAmerica