

Pursuant to our having just reviewed the final draft for "ENERGY STAR qualified commercial pre-rinse spray valves", we at T&S Brass applaud your initiative to finally incorporate low-GPM pre-rinse spray valves into the ENERGY STAR program, and look forward to playing an active part in its continued success.

Adherence to the ASTM F2324-04 standard is a very good start, as it uses established and widely accepted performance criteria as a baseline for spray valve performance. We hope that third-party certification to this standard will be required in order to ensure a fair and unbiased evaluation of all spray valves submitted for consideration in the (ENERGY STAR) program, or that spray valve models participating in the program will be routinely tested by the EPA to ensure compliance. We further hope that some time in the future, once this program has enjoyed the success we expect it will, the EPA will work with spray valve manufacturers to upgrade its performance requirements to the efficiency targets initially outlined in (the temporarily tabled) "Tier 2".

In closing, I will say that every element of this program seems right on target and that it, as a whole, is very well timed. Thanks for the great work you've done on this.