

June 24, 2005

Mrs. Rachel Schmeltz
Energy Star Program Manager
Environmental Protection Agency
Ariel Rios Building, SW, MS 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mrs. Schmeltz:

The Air-Conditioning and Refrigeration Institute (ARI) appreciates the opportunity to provide comments on the Draft 2 revisions to the Environmental Protection Agency (EPA) Energy Star Central Air Conditioner and Air Source Heat Pumps specifications.

ARI is a North American trade association representing the manufacturers of over 90% of U.S. produced air conditioning and commercial refrigeration equipment. ARI represents a domestic industry of approximately 200 air conditioning and refrigeration companies, employing approximately 150,000 men and women in the United States. The total value of member shipments by these companies is over \$30 billion annually.

ARI fully supports EPA's proposed changes to the energy efficiency levels for split systems. These new efficiency levels will increase product availability while ensuring greater energy savings. We welcome EPA's decision to continue its partnership with HVAC manufacturers and we are very appreciative of EPA's decision to continue to allow manufacturers to use the Energy Star logo on qualifying products. Overall, the proposed changes made by EPA will provide added value to stakeholders and will ensure that the program remains viable.

However, we would like to recommend against the elimination of gas/electric package air conditioners from the program. Instead, we suggest that EPA keep these products in the program and investigate the issue further to assess if an AFUE level above the current minimum federal standard of 78% can be economically justified. However, even if EPA determines that a higher AFUE level cannot be economically justified, ARI believes that there is value in having just a cooling specification as there are indications that these systems are used in regions of the country where cooling needs are more important than heating needs. ARI is willing to assist EPA during the course of its investigation.

We appreciate the opportunity to submit these comments. If you have any questions regarding this submission, please feel free to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read 'KAmrane', with a stylized, cursive script.

Karim Amrane
Director, Regulatory Policy
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<mailto:kamrane@ari.org>