

Fujitsu General America, Inc.

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June 24, 2005

Rachel Schmeltz - ENERGY STAR Program Manager
United States Environmental Protection Agency
Washington, DC 20460

RE: Comments on Draft 2 ENERGY STAR Program Requirements

Dear Ms. Schmeltz,

Fujitsu General America, Inc. supports the inclusion of Ductless Mini-Splits to the ENERGY STAR Program. In preparation for the 13-SEER mandate, Fujitsu is introducing Equipment that will meet and exceed the energy efficiency criteria outlined in Section 3. While ductless mini-split equipment today may represent a small percentage of the U.S. market for air conditioning equipment, it is the fastest growing segment and will someday represent a much larger segment.

We support the removal from the definitions for single package, split system, and gas/electric package unit: "Air is treated at a central location and carried to and from the rooms in a house by one or more fans and a system of ducts." We agree that removal of this sentence does not change the definition except to allow for the inclusion of ductless, mini-split equipment.

Once ductless mini-splits are included in the ENERGY STAR program we will gladly submit to ENERGY STAR the necessary information to be "qualified". Upon qualification, we will develop a marketing program that encompasses the following points.

- Properly use ENERGY STAR logo, consistent with the ENERGY STAR Identity Guidelines, on products and promotional materials. We will include this in our Fujitsu Media Kit that sets guidelines for proper use of our Logo.
- Incorporate ENERGY STAR training materials into our FAST (Fujitsu Authorized Service Technician) and T3 (Train the Trainer) classes to enhance wholesaler and contractor awareness and increase sales effectiveness.
- We would also include the promotion of ENERGY STAR in our national advertising campaigns and will utilize ENERGY STAR programs where possible.
- We will also attend where appropriate ENERGY STAR partner meetings and develop an ENERGY STAR strategy that integrates ENERGY STAR into our corporate strategy including Employee training, Tradeshows, Advertising/Marketing, Internet and Public Relations.
- We will also incorporate ENERGY STAR products where applicable to Save Energy within our Organization.

In conclusion, we request to be kept apprised of the development of a separate specification for proper installation. We very much want to work with the EPA in identifying proper testing and verification methods to qualify systems as "installed to ENERGY STAR guidelines."

Sincerely,

Roy Kuczera
VP Sales, HVAC Products

Cc: Mr. Tedd Rozylowicz – President, Chief Operating Officer, Fujitsu General America, Inc.
Mr. Masami Kato - Safety & Compliance Group Leader, Quality Assurance Management Division
Mr. Takashi Harada – Corporate Product Manager