



March 30, 2011

Mr. Christopher Kent, U.S Environmental Protection Agency:

Henny Penny would like to submit the following comments in response to the Final Draft: Version 2.0, Product Specification for Commercial Fryers released on March 18, 2011.

After further examination of this proposed specification, we've discovered that a common and popular fryer configuration has been excluded from the energy star process for reasons unrelated to performance and energy efficiency which presumably, is the underlying motivation of the Energy Star program. According to the new definition for a Standard Fryer, any model with a vat width of less than 14 inches will be excluded from participation. This is a major concern since one of the most popular open fryer models on the market today incorporates an oil vat measuring 12.2 inches wide. It should be noted that these models are direct competitors in the 14 inch class, but floor space constraints have required manufacturers to reduce vat size over time. We ask that the EPA open up their definition of a Standard Fryer to include 12 inch vat widths. Please note that our intent is not to gain any kind of unfair advantage against the larger 14 inch fryers, only the opportunity to demonstrate that we meet the Energy Star performance requirements.

In summary, Henny Penny feels that this specification should be more inclusive so that all models are at least given an opportunity to achieve Energy Star status rather than being excluded by definition.

I can be reached by phone at (937) 456-8689 or by e-mail at jredick@hennypenny.com if you have any questions relating to these comments.

Sincerely,

John Redick
Agency Engineer
Henny Penny Corporation