

Scotsman, Matt Alison

To Whom It May Concern:

Scotsman Ice Systems supports the concept of a continuous rather than a step function to determine the threshold. With the proposed equation, there are some capacity points where several machines on the market qualify, but as the capacity of the machine increases, the Energy Star target becomes much more challenging to the point where, in some cases, no machines on the market meet the target. We suggest that the equations be adjusted such that some machines at all capacity points meet the required target. This will allow a consumer of any size machine to have an Energy Star choice.

Additionally Scotsman would prefer to see the effective date for this specification moved from August 1, 2012 to January 1, 2013. The ice machine business is very seasonal, with the majority of sales taking place in the summer months. Educating the sales channel regarding this change during that time frame would be far less effective than in the off season. Also, there will be less field inventory during the winter months which will lessen the occurrence of machines marked with Energy Star that conformed under the old specification but to not meet the new specification.

Thank you for your consideration,

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