

January 30, 2009

Rachel Schmeltz
ENERGY STAR Product Manager
Office of Air and Radiation
United States Environmental Protection Agency
Washington, D.C. 20460

RE: COMMENTS OF DAIKIN AC (AMERICAS), INC. ON THE ENERGY STAR SPECIFICATION FOR LIGHT COMMERCIAL HVAC IN RESPONSE TO NEW FEDERAL MINIMUM EFFICIENCY STANDARDS THAT HAVE EITHER TAKEN EFFECT OR WILL TAKE EFFECT IN 2010

Dear Ms. Schmeltz:

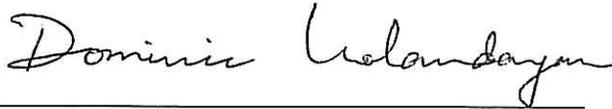
Daikin AC (Americas), Inc. (Daikin) respectfully submits the following comments in response to the United States Environmental Protection Agency's (EPA) request for public input on the Energy Star specification for light commercial HVAC in response to new federal minimum efficiency standards that have either taken effect or will take effect in 2010. Daikin is a supplier of central air conditioning systems in the United States that all employ inverter technology, a mature, non-proprietary technology that is widely available to HVAC manufacturers, and that can significantly reduce energy consumption in all residential and commercial HVAC systems.

The draft proposed specification has general requirements for light commercial HVAC equipment rated at 65,000 Btu/h or up to 250,000 Btu/h and tested to AHRI 340/360 (formerly ARI 340/360) but does not have requirements for Variable Speed and VRF light commercial HVAC rated at 65,000 Btu/h or up to 250,000 Btu/h and tested to test procedures as set forth in 10 CFR Part 430, Subpart B, Appendix M. EPA should consider including an alternate test procedure in the draft specification for Variable Speed and VRF light commercial HVAC so manufacturers could test and make valid energy efficiency representations until an industry standard becomes available. The Air-Conditioning, Refrigeration and Heating Institute (AHRI)

is in the process of developing a standard for Variable Speed and VRF Light Commercial HVAC which when approved will provide the general requirements for testing.

Daikin thanks EPA for considering these comments and we are looking forward to working with EPA during the transition to the new specification.

Respectfully submitted,



p.p. Lee Smith
Director – Product, Engineering and Applications
Daikin AC (Americas), Inc.