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Please consider the following a summary of the responses from USA Technologies regarding the ENERGY STAR® for Refrigerated Vending Machines, Rebuilt Machine Specification, Draft 2.

- *Referencing rebuilt vending machines expected to meet both the energy consumption and low power mode requirements:*
 - The low power mode requirement may significantly decrease the number of machines that will be eligible for the ENERGY STAR program.
 - Many of the older machines use a mechanical cold control to control the refrigeration system.
 - This statement will mean that from a practical stand point, it may be cost prohibitive to refurbish many of the older machines with mechanical cold controls.
 - We recommend that this requirement be removed for older mechanical cold control machines for refurbishment only.
- *Would USA Technologies be considered an OEM?*
 - Based on the second paragraph of the Draft 2 version, USA Technologies is the provider of the VendingMiser and VM2iQ products.
 - Base on the second paragraph of the Draft 2 version, USA Technologies is the provider of energy-efficient rebuild kit(s) to refurbishment centers for the installation of our product.
 - It is our assumption that USA Technologies will submit the data for the machines that would be eligible to become ENERGY STAR machines with the addition of our products.
- *Details on the refurb center and inclusion of suppliers/manufacturers:*
 - The refurbishment centers will be responsible for labeling the refurbished machines as ENERGY STAR once all work has been completed.
 - The inclusion of suppliers/manufacturers other than OEMs to the program, they would have to adhere to the same "rules" as the OEM's.
 - This could easily be accomplished by adding OEM or qualified component supplier/manufacturer where there now is just OEM.
 - This consolidation and relocation makes it difficult for the three OEM's to invest in the engineering, testing and manufacture of ENERGY STAR kits for existing equipment.
 - Nor is it in the OEM's best interest to provide cost effective upgrades to current machine owners, the OEM's would much prefer to sell NEW machines.
 - The OEM's would not be providing kits on a timely basis, given their business priorities, nor would we expect to see the kits priced in a range attractive to the machine owners.
 - We must include other suppliers, held to the same labeling, testing and UL requirements as the machine manufacturers.

- *Probably most compelling, reason for including other “sources” for ENERGY STAR upgrade kits:*
 - Opens the “technology door” for innovative, cost-effective and creative ways to reduce energy consumption.
 - Maintaining specified product temperatures and the UL integrity of the vending machine.
 - Restricting the ‘retrofit kit’ sources to the current machine manufacturers:
 - Limits technology development to companies barely able to survive in the current business environment.
 - Restricting the “Kit” suppliers to the manufacturers of the installed base would prevent what might be a “break-through” technology from ever reaching the marketplace.
 - There is at least one company (not an equipment manufacturer) that has developed “drop-in” refrigeration systems that could provide an easy “upgrade” for the bottler.
 - Coca Cola Co. has posted on their web site, and has discussed with certain large customers, their commitment to an entirely new, CO2-based, refrigeration technology, might be a very viable “retrofit” for the existing “float” of equipment.
 - Companies, like USA Technologies, have proven, cost effective and UL approved technology already available that brings certain make/ models into Tier 1 and Tier 2 compliance.
 - Other companies will very possibly invest in developing products if there is an “open” policy of including those manufacturers that meet the aforementioned requirements.

- *In a number of places the document refers to UL listing or equivalent.*
 - The term UL Listed has very specific technical meaning. We recommend changing the requirement to ... “That each component meets the applicable UL or equivalent safety requirements and that the components are Listed, Recognized, or Classified as applicable.”

- *The refurbishment standard will not be released until very near the start of or after the implementation of Tier II.*
 - We recommend that the implementation of Tier II power levels for refurbished machines be delayed for 18 months.
 - This allows the program a chance to begin implementation before the more restrictive standard is enforced.

Sincerely,
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