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Rebecca Miller
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August 21, 2003

Dear Ms. Miller,

This letter is in response to the Energy Star Program Requirements for Refrigerated Beverage Vending Machines. My concerns lie more with what is eliminated than what is proposed. By not addressing the installed base of vending machines in this country the proposed Eligibility Criteria have little real impact. With over four million existing vending machines in service the EPA is ignoring tens of millions of Megawatts and over four million tons of carbon dioxide emissions in favor of regulating about 6% of that number manufactured on an annual basis.

The decision not to pursue a retrofit option is based on UL approvals, tracking issues and retrofit procedures. None of these are really obstacles to an Energy Star label. Vending machines are regularly retrofitted and remanufactured with approved UL parts. Labeling of machines that have been remanufactured with Energy Star compliant components is just as easy as labeling newly manufactured vending machines and allows the EPA to track those machines in service on the same basis. Finally the manufacturing partners presently do not control all retrofit procedures yet components are regularly installed. In short, the "objections" to including the meaningful part of the vending machine market do not match the enormous benefit that could be obtained by bringing them under the proposal now.

I am also concerned that in the real world vending machines do not operate in 90-degree test chamber environments. Setting such a standard could easily result in machines that obtain Energy Star status but do not actually create savings in a real world environment. Why not set that standard at the average temperature, which is in the mid 70's?

In conclusion it seems that by ignoring the installed base and testing at unrealistic temperatures the EPA is spending a lot of time and effort to create a standard that will marginally effect our lives over the next decade, when, with a few simple changes the EPA could make a real impact.

A handwritten signature in black ink, appearing to read "Marc Geman", with a stylized, cursive script.

Marc Geman