

January 15, 2004

Ms. Rebecca Duff
ICF Consulting
Washington, DC

RE: Final Draft Specification for Energy Star® Qualified Refrigerated Beverage
Vending Machines

Dear Ms. Duff,

I have the following three comments regarding the proposed specification:

1. Section 4A1 and 4A2

The specification reads:

“...and 36±1 °F (2.2±0.5 °C) beverage temperature throughout the test.”

It should read as follows:

“...and 36±1 °F (2.2±0.5 °C) average beverage temperature throughout the test.”

This wording conforms exactly with both the existing and proposed ASHRAE specifications.

2. Section 3B – Low Power Mode

The last paragraph in this section specifies low power mode as requiring the following:

“The low power mode-related controls/software shall be capable of on-site adjustments by the vending operator or machine owner.”

Including such an allowance ensures that the controls will never be used. The current installed base of machines already have such features, and to a person the bottlers will admit that these features are never enabled. The reason for the non-use of these features are:

- A. They Require Advance Knowledge Of The Facilities Hours Of Operation. Even in educational facilities, the occupancy hours vary based on after-hour and weekend activities, athletic activities, and school holidays and vacations. Commercial locations face the same

problem, with after hour or weekend occupants risk being denied cold product, an event the bottlers will avoid at all costs.

- B. Significant Additional Technician Time When Installing The Machine.
The programming of the machines to enable such features must be done in a very arcane fashion as no keypad exists on the machines. Using the product selection buttons, the technician must painfully walk through many levels of menus to set up proper operation.
- C. Inability to Verify Feature Operation. Vending machine are replaced on average every 12-18 months to be refurbished and cleaned. When replaced, there is no way for the location to verify that the new machines has been programmed to match that which it replaces. Given the programming difficulty, the replacement will rarely be properly programmed.

I therefore strongly urge the EPA to modify this sentence so that it reads:

“The low power mode-related controls/software shall not be capable of on-site adjustments by the vending operator or machine owner.”

3. Elimination of the Existing Installed Base From The Energy Star Specification From Section 2

Section 2 identifies that the requirements for refurbished machines will be determined within one year of the effective date presently scheduled as February 1, 2004.

The existing installed base of refrigerated vending machines will not be replaced for ten years at current production levels. In fact, the replacement is likely to take even longer as the market for such machines is approaching saturation . However, once an Energy Star® standard is available for refrigerated vending machines it is likely that customers who have refrigerated vending machines on their premises will request that the machine supplier provide Energy Star® qualified machines. Qualified machines will be such that this demand that this cannot be satisfied by any short term plan to replace unqualified, and possibly brand new, machines with Energy Star® qualified machines. Even if this demand could be satisfied, the environmental pollution caused by the scrapping of millions of perfectly good cold drink machines, with the attendant tons of discarded refrigerants, cooling oils, painted metal, and non-recyclable plastics and electronics will more than negate any pollution reduction by the new machines. An accommodation must be made to allow the existing installed base

to be upgraded at the same time that new Energy Star® machines are made available.

If the standard proposed in the Final Draft is applied to refurbished machines from the its release date, manufacturers and refurbishment centers will be in a position to begin qualifying machines in the field as Energy Star® rated. This will help both the owner as well as the customers achieve the desired environmental result quicker, and ease the demand for newly manufactured machines such that the combination of both will bring the entire base into compliance at a faster rate than the proposal currently contemplates.

I strongly recommend that EPA reconsider its position and allow the existing installed base of refrigerated vending machines to be tested and certified to the same standard as newly manufactured machines effective the same date.

Thank you in advance for your consideration.

Sincerely yours,

A handwritten signature in black ink, appearing to read "David J. Schanin". The signature is fluid and cursive, with the first name "David" and last name "Schanin" clearly distinguishable.

David J. Schanin
President