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January 15, 2004

Re: Comments on Final Draft specification for Energy Star[®] qualified Refrigerated Beverage Vending Machines.

Comment 1.

Under Section 2 Qualifying Products: 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 significantly outnumbered the yearly production of newly manufactured machines. Once an Energy Star[®] standard is available for refrigerated vending machines it is reasonable to assume that customers who have refrigerated vending machines on their premises, particularly those in the institutional and governmental sectors where large installed bases exist, will request Energy Star[®] qualified machines. The availability of qualified machines will simply be insufficient to meet that demand and cannot be satisfied by any near term plan to substitute qualified machines for those in the field. This will put the owners of the machines in a difficult position in trying to satisfy their customer base.

On the other hand if the standard proposed in the Final Draft is applied to refurbished machines from the same start date, OEM's and refurbishers 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 sufficiently so that the combination of both will bring the entire base into compliance at a faster rate than the proposal currently contemplates.

We strongly recommend that EPA reconsider its position and subject the existing installed base of refrigerated vending machines to the same standard as newly manufactured machines from the same start date.

Comment 2.

Section 4A1 and 4A2: This should be changed to add the work "average" before the words "beverage temperature throughout the test." That would make the standard conform to the ASHRAE standard.

Comment 3.

Low Power Mode: The requirement to have on-site adjustments of the machines simply means that practically all of the existing machines will meet the requirement and in fact no energy savings will be realized. Timers and set points have been available for quite some time and not used by the customers or owners due to a variety of circumstances. EPA should learn from what has actually occurred in the field and make low power mode a meaningful state by requiring that the machines not be capable of on site adjustment with respect to that mode.

Thank you for the opportunity to comment.

Very Truly Yours

A handwritten signature in black ink, appearing to read 'Marc Geman', written in a cursive style.

Marc Geman