



Serving the Vending, OCS and Foodservice Management Industries

## Memorandum

**To:** Rachel Schmeltz  
c/o Rebecca Duff, US EPA ENERGY STAR Program

**From:** Larry M. Eils, Senior Director Technical Services

**Date:** January 16, 2004

**Re:** ENERGY STAR Program requirements for refrigerated beverage vending machines – Eligibility Criteria Final Draft

On the behalf of the NAMA members that manufacture beverage vending machines and vending operators that use these machine NAMA is responding to your Final Draft Eligibility Criteria sent out December 22, 2003. We want to take this opportunity for taking into consideration and accepting several of our proposed changes set forth in our August 20, 2003 Memorandum to you.

However, we would like to propose two additional changes for your consideration. Our first change has to do with the Qualified Production Information Form and our second proposal has to do with the Eligibility Criteria.

With regards to the Information Form we are requesting a word change in the Note paragraph on the bottom of page 1. In the first sentence we would like the word “will” changed to the word “would”. Since there are other testing laboratories used by our manufacturers to certify the electrical safety of vending machines it is felt that the word “will” indicates that only UL can be used to achieve electrical certification. The new word “would” gives the manufacturer latitude to use other testing laboratories.

As we mentioned in our August memorandum the inclusion of remanufactured vending machines into this program at the initial start is very crucial to the success of this program. Our vending machine manufacturers and suppliers have been able to work out internal procedures that would allow remanufactured machine models to qualify as ENERGY STAR. Therefore, we are requesting that Section 2. Qualifying Products be revised to read as shown on the attachment. We do understand you may have some concern about internal procedures of how the manufacturers will comply with the requirements set forth in the Qualified Product Information Form. But we are certain the vending machine manufacturer will be able to answer those questions satisfactorily.

We do want to thank you for extending the first phase, Tier I, to December 31, 2006. However, we still wish to withhold the initial effective date until April 1, 2004 which would coincide with the beginning of the NAMA Spring Expo. It is our members belief that it will take this amount of time to complete the necessary paperwork to have the first refrigerated beverage vending machines listed by the ENERGY STAR Program.

We look forward to hearing from you as to the acceptability of our proposals. Should you have any questions in the meantime, please do not hesitate to contact me.

Enclosure  
PHT-Energy

The National Automatic Merchandising Association . [www.vending.org](http://www.vending.org)

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