

To: Rachel Schmeltz  
ENERGY STAR, Product Manager  
US Environmental Protection Agency

From: Larry M. Eils, Senior Director Technical Services

Date: August 20, 2003

Re: ENERGY STAR Program Requirements for Refrigerated Beverage Vending Machines – Eligibility Criteria Draft 1

On behalf of the NAMA members that manufacturer beverage vending machines NAMA is responding to your Draft 1 Eligibility Criteria sent out July 31, 2003. It is our feeling that three major issues still remain unresolved in your proposed Eligibility Criteria. These are as follows:

1. The removal of retrofitted or re-manufactured vending machines from these Criteria is not satisfactory. The large install base remains a major operator issue that needs to be addressed.
2. Currently ASHRAE Standard 32.1-1997 Methods of Testing for Rating Vending Machines for Bottled and Canned Beverage is undergoing major revision and is now close to final acceptance of a revised document. This revision will have a major impact on your proposed Eligibility Criteria because of the new standard test package definition which would then address our concern for the lack of criteria for glass front beverage machines.
3. Our final concern is the lack of criteria for glass front beverage vending machines which are becoming more and more a part of the industry today.

Therefore, we propose that the implementation date for your proposed eligibility Criteria be postponed until these three items can be addressed to both our satisfactions.

I would like to now take your Eligibility Criteria and present short comments relating to each of the sections for your review and comment.

1. Definitions C. Vendible Capacity:

Our concern here is the intended use of the machine wherein cans only is prescribed by the current ASHRAE Standard 32.1-1997. As stated above, it appears this ASHRAE Standard will, in all probability, be adopted in January 2004 at the next ASHRAE meeting. This will change the Standard test package allowing this Eligibility Criteria to then consider glass front bottle machines for inclusion.

2. **Qualifying Products:** There are two concerns here. The first has to do with the lack of including retrofitted vending machines into this program. We believe it would be extremely advisable that representatives from the EPA, Underwriters Laboratory, machine manufacturers, NAMA, and other interested parties meet to discuss how this critical item can be resolved. In addition, there was concern that milk vending machines, which are glass front containing a temperature sensitive product, were not included in this draft. These types of machines are becoming a major player in the vending industry and need to be considered. We would like to propose a new Tier 1-A be established for glass front milk vendors exempting them from the low power mode but meeting Tier 1 energy requirements.
3. **Energy-Efficiency Specifications for Qualifying Products:**
  - a. **Energy Consumption:** We have two concerns here. The first is that glass front beverage machines have been excluded from this requirement. As mentioned earlier it appears the industry is moving toward this type of merchandising device and it should not be neglected at this point. Therefore, we would like to work with the EPA on defining a new Tier category for these types of machines. Our second concern is the requirement to go to a second Tier in 2005. Please see our comments below that further explain our view on this matter.
  - b. **Low Power mode:** No comments concerning this Section.
4. **Test Criteria:** Once again we want to reiterate that the ASHRAE Standard 32.1-1997 is undergoing a major revision and that revision should be considered as part of the Eligibility Criteria to allow the inclusion of glass front vending machines.
5. **Effective Date:** Based on the above comments we are requesting that the USEPA Energy Star Program postpone the implementation of the Eligibility Criteria as proposed in Draft 1. We would like to propose that each of the items mentioned in this memorandum be addressed in order to develop a consensus document acceptable to all parties.

We would also propose that when we do come to a conclusion with regard to Tier 1 requirements that there be no Tier 2 requirements present in the Eligibility Criteria. We propose this for several reasons. The economic slump being experienced by the entire vending industry is making it extremely difficult for any manufacturer to expend funds on major revisions. Further technological changes will be needed in our machine design criteria, both in cabinet and refrigeration components, to achieve Tier 2 requirements. It was felt that the 18 months between Tier 1 and Tier 2 is much too aggressive for the industry to accept in light of design changes being looked at.

As we mentioned earlier, we are more than willing to meet with you to discuss these concerns and see if we can resolve these issues to bring about implementation of an Energy Star program in the vending industry. This is the FIRST type of energy regulation for the vending industry and we hope to make it right the first time.