

“The ENERGY STAR label must be clearly displayed on the front of the machine”

I do not agree with the EPA assertion that “placing the ENERGY STAR label on the front of the machine will have the greatest impact on the consumer.” Labeling on the front of the machine has zero impact on the beverage company purchaser. Or the assertion that it “conveys the commitment of the beverage company.” The beverage company decides if it wants to convey commitment and how to do so, not the EPA.

The beverage company specifies the graphic presentation of the vendors to be shipped. This ready-to-place appearance reduces staging time for the beverage company. A non-beverage company trademarked label on the front of the vendor interferes with the beverage company’s marketing presentation of its products. The beverage company would have to invest additional manpower to remove a label that is not consistent with its marketing intentions or impedes its ability to attract consumers.

Unlike domestic refrigerators that are predominantly sold via a showroom where features and performance are openly posted to aid with the purchase decision, beverage companies purchase vendors based on predetermined performance specifications and authorization agreements. The purchaser is not swayed by signage and special labeling placed on the machine. To the contrary, undesirable signage is burdensome to the beverage company; it may convey a message that is inconsistent to marketing strategy. Understand that the beverage company may specifically request that ENERGY STAR labels not be placed on its machines - even if it is an ENERGY STAR qualified machine. The beverage company (and not the EPA) should determine what commitment it wants conveyed via messages and labeling placed on the front of the machine.

“...provide to the EPA, on an annual basis, unit shipment data”

This information is not indicative of machine placements or ENERGY STAR saturation in the trade. So, this number may not translate to “penetration.” Just because a machine is shipped in a particular year does not mean that the machine is placed in the same year. Purchased machines may be warehoused for a considerable time period. They can only be placed when older machines are retired or new accounts are established.

“Performance for Special Distinction”

I am concerned that under this initiative a participant may be penalized by not receiving this distinction even when going beyond the ENERGY STAR intent, simply because ENERGY STAR qualified machines are not used. For example, a customer may be better served with a Bottler retrofitted vendor, instead of the ENERGY STAR qualified vendor. A retrofitted/remanufactured vendor may be as energy-saving, or even more energy-saving, as an ENERGY STAR machine. Further, power management features do not guarantee energy savings. Beverage company tests indicate that for some accounts energy management features in vendors may result in increased energy with sacrificed beverage quality. The beverage company can best determine if enabling the power management system will benefit. If the consumer insists that power management be deployed just for the sake of a distinction from the EPA, it may have the opposite result from what the EPA actually intends.

“Qualifying Product. .temperature sensitive machines cannot qualify as ENERGY STAR at this time.”

In many cases the manufacturer cannot determine - or does not know - if the machine will be used for temperature sensitive products. The exact same vending machine models can be used for nonperishable beverages or for biodegradable food products. The October 2002 meeting discussion around this issue was to make the point that mandating the use or activation of a temperature altering energy management system for ENERGY STAR qualification may not be prudent.

I believe that the manufacturer should only enable power management systems at the request of the purchaser. It must not be a requirement for ENERGY STAR. The beverage company knows what products will be in the vendor, and the nature of accounts where machines are placed, and thereby should determine where power management systems should be enabled. This must not be micro-managed by the EPA.

With regard to machine retrofits: Would the EPA be willing to condone a beverage company partner ENERGY STAR vendor remanufacturing program? Where the machine purchaser structures a remanufactured vendor program in such a way that it avoids the UL problem, guarantees ENERGY STAR qualification, and achieves ENERGY STAR compliance via beverage company tracking and reporting of data. The modified machine models would not be listed on a web site, but the beverage company bottler could provide energy performance information per serial number, and benefit from the use of some EPA sanctioned identification, such as “ENERGY STAR COMPLIANT.”

“Energy-Efficiency Specification for Qualifying Products:”

No problem. This looks OK.

Thank you for allowing this opportunity to provide comments.

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