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May 25, 2007

Mr. Richard Karney  
ENERGY STAR Products Manager  
United States Department of Energy  
1000 Independence Avenue, SW  
Washington, DC 20585

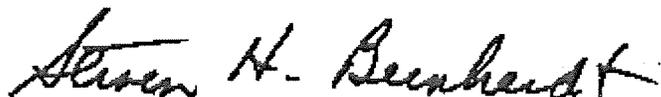
Dear Mr. Karney:

On behalf of Honeywell International Inc. ("**Honeywell**"), I am writing in response to the "Market Impact Analysis of Potential Changes to ENERGY STAR® Criteria for Refrigerators" (the "**Impact Analysis**") published by the Department of Energy ("**DOE**") on April 27, 2007 in which three options for ENERGY STAR criteria were proposed for standard refrigerators.

Honeywell supports without reservation raising the minimum ENERGY STAR criteria for standard refrigerators to 20% more efficient than the Federal standard from the current criteria of 15% better than the Federal standard with an effective date of April 1, 2008. As the Impact Analysis makes clear, ample technologies exist today to enable refrigerator manufacturers to achieve the greater energy efficiency required under the proposed new criteria without redesign of product platforms or significant capital investments. Honeywell also supports the ENERGY STAR® Program Eligibility Criteria for Residential Refrigerators and/or Freezers based on NAECA appliance standards set forth in the April 27, 2007 draft "Partner Commitments" circulated concurrently with the Impact Analysis.

Honeywell very much appreciates the opportunity to comment on the proposed change in the minimum ENERGY STAR criteria for standard refrigerator models.

Yours truly,



Steven H. Bernhardt, Ph.D.  
Global Director Regulatory Affairs  
Honeywell Chemicals