



June 7, 2007

Richard Karney P.E.
Energy Star Program Manager
U.S. Department of Energy
Building Technologies Program
1000 Independence Avenue, SW
Washington, DC 20585-0121

Dear Mr Karney:

Sub Zero sincerely appreciated both the opportunity to participate by phone in the June 4 stakeholder meeting and DOE's interest in soliciting views from the large number of participants. While our substantive comments are contained in our May 25 letter, we will add a few additional clarifying points as you requested:

- The proposed improvement from 15% to 20% over the current standard is a significant technical challenge. As refrigerators become more efficient through successive improvement efforts brought about by mandated standards and voluntary programs like Energy Star, the level of difficulty increases each time. Whether it requires new blowing agents in insulation systems or components such as fans or compressors, each generation of improved product requires more effort, ingenuity, development time and cost than before, as well as posing more risk.
- The comments from several stakeholders reinforce the need for reasonable technical analysis on the part of DOE that goes beyond trend extrapolation and simple market research. We encourage DOE to accept the invitation of GE and other manufacturers to learn more about the details of the steps needed to design, test and commercialize large quantities of products that meet the 20% improvement level.
- Manufacturers are currently in different phases of their product development cycles. This impacts their schedules for practical introduction of substantial quantities of products at new Energy Star levels. It is important that DOE not disrupt the level playing field by specifying an effective date that is too soon to allow all manufacturers opportunity to compete. We strongly encourage DOE to set an effective date no sooner than early 2009.

Please feel free to contact us for further information and any assistance we might provide.

Sincerely:

SUB-ZERO FREEZER COMPANY, INC

Paul Sikir, Vice President of Sub-Zero Design Engineering

Copy: James Bakke, President & CEO
Richard Topping, Government Relations