



May 25, 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 Freezer Company appreciates this opportunity to provide comments on the proposed changes to the Refrigerator Energy Star Program. In general we support the changes; Sub Zero is committed to energy efficiency and, in fact, is well along in the process of redesign to meet the current Energy Star levels. Therefore, the proposed increase in level of improvement required will be even more of a challenge to us. However, we believe voluntary programs aimed at increasing efficiency for those consumers who choose to and who can truly benefit are an important DOE activity.

There are two issues that impact us differently from the major producers of refrigerators and freezers for the US market. First we are a small manufacturer. Companies such as ours typically find themselves using the highest efficiency, most costly components available but still cannot match the capabilities of the major manufacturers to achieve the performance of precision, high production foam insulation systems. With far fewer design resources available to expend across numbers of basic models not largely different from the larger manufacturers as dictated by market requirements, small producers have a very difficult time meeting new standards, not to mention attempting to achieve Energy Star levels.

Second, our product line is comprised almost exclusively of built-in units. Technical and market considerations make it more difficult for built-in refrigerator-freezer products to meet higher minimum efficiency standards. The reduced depth of these products requires larger door area and additional gasket and throat area length for equivalent storage capacity compared to conventional depth freestanding units. These factors contribute to larger thermal losses for the cabinet. Also, consumers are now demanding high end features, such as external drawers and glass doors that consume additional energy.

In the next refrigerator rulemaking, we will be asking DOE to consider making built-in units a separate product class. At that point, different Energy Star levels might be justified also.

For the foregoing reasons, we would request that DOE consider moving out the effective date for the new Energy Star levels to January 1, 2009. The proposed April 1, 2008 date is too tight and really does not give companies such as ours adequate time to adjust. Given that less than 5% of the current models currently meet the proposed level (and model data does not even reflect shipments) we expect the proposed implementation date is not achievable for many manufacturers. At the same time, we would desire to have at least some of our products meet the new proposed Energy Star level on its effective date.

We appreciate the opportunity to submit comments and ask that you seriously consider our request. Feel free to contact me with any questions.

Sincerely:

SUB-ZERO FREEZER COMPANY, INC

Paul Sikir, Vice President of Sub-Zero Design Engineering

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