



GE Consumer & Industrial

Appliance Park, AP2-225
Louisville, KY 40225
USA

May 16, 2005

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

**Re: Proposed Expansion of ENERGY STAR® Room Air Conditioner Criteria to
Include Reverse Cycle (Heat Pump) Room Air Conditioners**

Dear Mr. Karney,

Per your May 6 request for comments, GE submits these comments in support of the Department of Energy's (the "Department") proposal to expand ENERGY STAR® room air conditioner criteria to include reverse-cycle heat pump models.

GE has been an appliances ENERGY STAR partner since 1997 and is a 2004 and 2005 ENERGY STAR Manufacturer of the Year. We are a leading marketer of built-in heat-pump air conditioners. We believe that expanding the scope of the ENERGY STAR air conditioner program to include built-in heat-pump air conditioners will make it more meaningful for property managers and consumers in large metropolitan areas in the Northeast and Upper Mid-West.

Although, as noted in the Department's analysis, the market for heat-pump air conditioners is not large, it is important that the program be made as comprehensive as possible. This will increase ENERGY STAR brand recognition and encourage manufacturers to invest in new product development.

Thanks you for the opportunity to comment.

Yours truly,

A handwritten signature in black ink, appearing to read 'Earl F. Jones', enclosed within a large, loopy oval shape.

Earl F. Jones
Senior Counsel

Cc: Jim Benz