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September 24, 2015

Ms. Abigail Daken
ENERGY STAR Water Heater Program Manager
U.S. Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Abigail:

We did not become aware of the issuance of the draft Energy Star product specification for commercial boilers until the day before the September 9, 2015 webinar. Consequently a number of our members who manufacture commercial boilers did not become aware of that activity until then. One effect of this unfortunate circumstance is that we had nominally 2 weeks to review and comment on the draft specification. We could not develop AHRI comments in that short period and we will not have comments ready by tomorrow.

We are working on developing comments and will be meeting with our boiler manufacturer members on October 8, 2015. One of the items we will discuss then is the EPA draft specification for commercial boilers and we will provide our comments the next day, October 9, 2015. We trust that in view of the circumstances cited above, you will accept these comments and consider them in the same manner as all other comments submitted on this item.

We appreciate the opportunity to comment on this draft of the Version 1.0 Commercial Boilers Specification. If you have any questions, please do not hesitate to call me.

Respectfully submitted,

A handwritten signature in black ink that reads "Frank A. Stanonik". The signature is written in a cursive, flowing style.

Frank A. Stanonik
Chief Technical Advisor