

Thank you for gathering all of the industry stake holders together and giving us, equipment manufacturers, the opportunity to provide you feedback regarding upcoming changes to electric fryer ES qualification requirements.

Vulcan team found the discussions very healthy and constructive for improving the current technology base and enticing the implementation of emerging technologies into food service industry. Even though the proposed changes will be affecting Vulcan product line, we are planning to put resources behind this initiative and meeting ES qualification requirements for the standard vat electric fryers. This change will be affecting 28 of 71 ES qualified standard electric fryer models, approximately 40% of the current ES listing.

As I raised concerns during our conference call, Vulcan team believes that the gas fryer market is substantially larger in size and 50% cooking efficiency requirement for ES qualification needs to be reevaluated immediately. Most of the fryers in the market place meets this threshold and ES label fades away from becoming a real differentiator between entry level and high-end fryer products to drive industry towards energy efficiency. Based on ES listed gas fryer models on EPA website; 73 of 83 are over 52% cooking efficiency, 57 of 83 are over 54% cooking efficiency and 47 of 83 are over 57% cooking efficiency. The impact of raising 50% threshold by 2, 4 and 7 points will respectively shrink the current ES gas fryer listing by 12%, 31% and 41%.

ITW FEG group has been a strong ES program partner and will continue to invest supporting future ES initiatives.

We look forward to working with you and EPA team on future development programs.

Sincerely,

Cinar Gulkanat