

**Item 2) Scope; page 3:
Excluding smaller capacity Combi ovens form scope that accommodates up to 4
pans 12 x 20 x 2½ inch steam pan:**

As we are all aware the best efficiencies of cooking devices, takes place when they are operated at capacity. Such smaller capacity units are showing to be an important addition to smaller eating establishments, as they provide the most versatility to such restaurants (being able to steam, bake and roast) with a very small footprint. Such cooking versatility allows smaller venues to make the most efficient use of their limited kitchen space while allowing them to prepare a more varied menu selection. In addition as technology makes it feasible for such Micro Commercial appliances to be operated in an energy efficient manner, it not only allows the industry to more energy efficiently serve this industry by providing energy efficient equipment scaled to their smaller capacity needs, but allows the additional energy savings of not having to own and operate additional pieces of equipment in order to provide a more varied menu selection to their customers.

As such we strongly recommend that the standard not limit the opportunity to encourage such smaller businesses to reduce their energy consumption. We would also point out, that this may further reduce energy consumption in not creating additional pieces of equipment, as well as to not operate larger pieces of equipment that would not be run at their optimal capacities solely to obtain the energy rebates available to owners of Energy Efficient rated equipment.

So, we ask to add the so called "Mini-Line" units to the V3.0 Specification. I have added our Mini brochure for your convenience. Please also note that in our industry segment we see a strong movement towards these units size. Many competitors are already providing the sizes.