

Thank you for the opportunity to respond to the draft 2 proposal. I am responding on behalf of Follett Corporation. Please include me on the September 21st webinar. My comments are below.

- Follett supports the proposal to exclude RCU units designed for connection to remote rack compressors. In some cases, a “low side” ice making head is sold under the same model number regardless of whether it is connected to a rack system or a dedicated “high side”. A practical solution needs to be put in place as to how to keep an Energy Star compliant model sold into a scenario with a rack system. Perhaps a note can be added to specification sheets that would state that model X icemaker is Energy Star compliant if connected to Y condensing unit.
- Follett requests that ice and water dispensers be included in draft 2. Follett has submitted that ice and water dispensing consumes a negligible amount of electricity. In draft 2, references to pumps are chillers are made. Follett ice and water dispensers (and many others) do not have pumps or chillers. If an ice and water dispenser chills the water or pumps, Follett agrees that it should be excluded from this draft.
- For clarification purposes, Follett proposes that “Ice Hardness Adjustment Factor” be defined in the same section of the document as “Ice Hardness Factor” and Calorimeter Constant”. Because of the similarity in the names of the terms, “Ice Hardness Adjustment Factor” and “Ice Hardness Factor” could be confused as being synonymous, when in fact one is used to derive the other.
- Follett maintains that ice hardness should not be used in lieu of ice quality. Hardness could refer to total dissolved solids in water. Additionally, there are other tests we could resort to if we truly wanted to measure how hard the nugget is. Quality has been used for many years in the industry to describe how much ice/water is in extruded ice.
- Follett continues to maintain that cube ice is not 100% ice and should be subjected to the same adjustment that nugget machines are subjected to. Cube manufacturers have admitted as much as a 5% variance from 100% which is significant enough to impact a published energy usage. Adjusted and non-adjusted energy efficiency numbers should be published.
- Follett contends that ice hardness testing can be done with repeatable results. Follett would like to propose some methods for improving repeatability across the industry, such as, standardizing the vessel used in the test.

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