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May 23, 2012

To: ENERGY STAR Specification Development Group

Subject: Comments on the Final Draft of Proposed Energy Star Version 3.0
For Refrigerated Beverage Vending Machines

Dear Sir or Madam:

Thank you for the opportunity to comment on this proposed Final Draft. I will make two comments:

I believe that some clarification is necessary in Section 3 with the definition of Refrigerated Volume. The AHAM HRF-1-2004 is very generic and is open to a wide range of interpretations. I believe the EPA's intent here is to follow the DOE's 10 CFR 431 requirement on this, and therefore I suggest that the full DOE reference to the use of Section 5.2 (excepting 5.2.2.2/5.2.2.4) of that Standard be explicitly included here. (See Federal Register Vol. 74, No. 167, p.44921). This should help eliminate confusion and lead to a more uniform interpretation of this important component of the MDEC calculation.

I would also suggest that the implementation date be extended to at least August 31, 2013. This because the extra 5% reduction in MDEC will be difficult to achieve with components presently used, and new system components will force us to conduct extensive component qualification testing and will require other Safety Agency (UL, ETL, etc.) approvals be obtained. This is in addition to the time required to obtain the 3rd party Energy certification testing on each Basic Model. I think that it will be extremely difficult and burdensome to achieve all of this in the nine months now specified.

Thank you for your consideration,

Jim Collins
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