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August 10, 2011

Ms. Amanda Stevens  
U. S. Environmental Protection Agency  
Energy Star Appliance Program  
Email: [appliances@energystar.gov](mailto:appliances@energystar.gov)

Re: Absocold Corporation Comments on the ENERGY STAR Residential Refrigerators and Freezers Version 5.0 Specification Framework Document

Dear Ms. Stevens:

On behalf of Absocold Corporation, I am offering our comments to the Environmental Protection Agency (EPA) regarding the subject matter above referenced.

Absocold Corporation has been offering refrigeration products in multiple product classes for distribution throughout the United States since 1969. We support the efforts of the EPA and the Department of Energy (DOE) for the improvement in the energy efficiency of many consumer and commercial products and we very much appreciate the opportunity to offer our comments regarding the Version 5.0 Specification Framework Document.

1. With respect to the Framework Document, the EPA has requested feedback on whether the Agency should consider revisions to certain product categories with relatively low market shares of ENERGY STAR products based on anticipated advances in response to the 2014 standards; or alternatively, should some of these product categories be sunset in 2014 once the new standards are in place.

Absocold Corporation feels that any sunset approach would be inappropriate as there are several government agency buyers in the United States who are required to buy ENERGY STAR products, such as compact refrigerators and refrigerator-freezers, such as those now offered through General Services Administration. These products are used by the thousands in most all military housing and in many government office buildings. Additionally, the hospitality industry, along with student housing which is a big part of campus life at most Colleges and Universities in the U. S., have relied on the ENERGY STAR designation in an effort to support the GREEN initiative and to help reduce energy consumption in connection with the in-room compact refrigeration, which is often provided for the convenience of hotel guests and college students.

To effectively eliminate continued energy efficiency improvement in certain product categories would likely produce the end result of gradual increased energy consumption within certain markets; create considerable confusion among

government and institutional buyers; and, would serve to restrict competition to favor of the large volume, major household appliance producers and retailers.

2. In the Framework Document, the EPA sought comment on the Agency's consideration of setting out-year criteria through this specification revision. Absocold supports the concept of multiple phases of implementation; however, we are concerned about setting ENERGY STAR requirements in December 2012 at levels significantly higher than the new DOE baseline for 2014 requirements.

We sincerely appreciate the opportunity to submit our comments in response to the Framework Document.

Respectfully yours,



Edward D. Mulick  
President