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Carrier

A United Technologies Company

John M. Mandyck
Vice President
Sustainability & Environmental Strategies

November 10, 2009

Ms. Christina Chang
ICF International
Via Electronic Mail at cchang@icfi.com

Re: Draft Final Energy Star Light Commercial HVAC Specifications

Dear Ms. Chang:

Carrier Corporation is pleased to submit these comments on the U.S. Environmental Protection Agency's (EPA) draft final Energy Star Light Commercial HVAC specifications. Carrier is the world's largest provider of air conditioning, heating and refrigeration systems, and a United Technologies company.

Carrier commends EPA for taking several industry comments into consideration for this final draft specification. Despite these considerations, we believe that the final draft specification must be changed in four key areas:

1. Blackout Period for New Listings

Carrier is very concerned that EPA provided only a two-day notice of its intention to implement a six month blackout period from October 31, 2009 to May 1, 2010 for new light commercial HVAC Energy Star product listings. Given major new refrigerant and energy efficiency regulations that take effect on January 1, 2010, many new products will be introduced into the marketplace in the coming months that would be ineligible for the Energy Star designation for the period proposed by EPA. Consequently, new products, many with energy and environmental improvements, will be at an unfair, competitive disadvantage to older products. We urge EPA to initiate the blackout period starting on March 1, 2010, especially given conformance with a nine month lead time as envisioned by the Energy Policy Act of 2005 addressed below (item 3).

2. VRF Units

Carrier believes that it is premature for EPA to include variable refrigerant flow (VRF) systems in the Energy Star specifications. AHRI Standard 1230 is not equivalent to the rating procedures for AHRI Standard 340/360

for packaged units, so using the same efficiency levels for VRF as packaged products would not be appropriate. Further, there is no certification program yet for VRF systems, nor is there a directory yet from which to draw data, while both of these measures exist for packaged products. Given these important distinctions, we urge EPA to defer consideration of any Energy Star specifications for VRF systems.

3. Lead Time

EPA indicates that it intends to finalize the specification no later than November 25, 2009 with a proposed implementation date of May 1, 2010, providing less than six months lead time. This accelerated implementation period is contrary to the nine month lead time as prescribed by the Energy Policy Act of 2005. Carrier does not support the accelerated lead time and urges conformance with the nine month period, especially for Tier II levels which are unknown at this time.

4. Standard Reference Dates

We note that EPA refers to AHRI standards without the reference year. Because these standards are periodically changed, we urge EPA to reference a specific standard year for clarity. In this regard, we recommend referring to AHRI Standard 210/240-2008, and AHRI Standard 340/360-2007. AHRI Standard 1230 is expected to be finalized in 2010.

Thank you for considering our views.

Sincerely,

A handwritten signature in black ink that reads "John M. Mandyck". The signature is written in a cursive, flowing style.

John M. Mandyck