

CRANE[®] MERCHANDISING SYSTEMS[™]

1-13-12 -

Dear Sir or Madam,

Crane Merchandising Systems would like to provide comments in regards to the proposed draft of the Energy Star program requirements for refrigerated beverage vending machines. Crane Merchandising Systems Inc. (CMS) builds vending machines under the brand names Dixie Narco, National Venders, Automatic Products, GPL, Stentorfield, and Polyvend. CMS has been a leader in the area of Energy Conservation within the refrigerated beverage vending machine industry and a driving force supporting Energy Legislation for the past 10 years.

We at CMS believe that with development of legislation by the Department of Energy, the Energy Star program remains valuable to the vending industry. The legislation developed by the DOE sets a minimum threshold. However, the Energy Star program provides an opportunity to recognize best in class equipment where the DOE legislation provides little opportunity for recognition other than compliance. From what we are experiencing, consumers and locations are just now starting to recognize the availability of Energy Star compliant machines. We are taking orders daily for equipment and refurbishment kits from customers who are dealing with accounts asking for Energy Star compliant equipment. The consumers and locations requesting this equipment recognize the Energy Star mark as a symbol of superior energy efficiency and want equipment that meets and exceeds those standards. As we continue to strive to produce the most energy efficient equipment available we believe that the following suggestions will provide clarity and rigidity to the Energy Star Program. Please review our observations and recommendations within the following pages.

Crane Merchandising Systems supports the EPA Energy Star Program and believes in its ability to drive change within the vending industry. CMS appreciates the opportunity to participate and provide comment on such an industry changing energy conservation initiative. We look forward to the ability to provide further review and comment on this proposed program and potential changes.

Best regards,

Jim Mathis

Crane Merchandising Systems

The following are comment and suggestion based on our review and understanding of the proposed changes to the Product Specification for Refrigerated Beverage Vending Machines.

1. Definitions: Item "C"

We believe that the current definition is lacking description and doesn't truly capture an ideal comparison between a refrigerated can and bottle vending machine and combination vending. With that said, we offer the proposed definition which we believe provides a better description and comparison of a combination vending machine.

Current definition

C. Combination Machine: A refrigerated bottled or canned beverage vending machine that also has non-refrigerated volumes for the purpose of vending other, non-"sealed beverage" merchandise.

Proposed definition

C. Combination Vending Machine: A vending machine configurable as either a fully cooled or zone cooled vending machine capable of refrigerating and dispensing canned and bottled beverages as well as other non-"sealed beverage" merchandise.

2. Scope: Item "B" Excluded Products

Crane Merchandising Systems builds vending equipment designed to operate as a Combination Vending Machine. We believe that as the marketplace has evolved there is an opportunity to include Combination vending machines as part of the Energy Star program. Currently both the CEC and NRCAN recognize these machines as multi-package. We believe that with the transition to volume as the integral part of the MDEC equation this allows for smoother transition and inclusion under the same guidelines as the refrigerated beverage vending machines. Given the flexibility in the design of these machines to be operated in a Fully Cooled configuration, we propose that these machines be tested and subject to the requirements associated with Class A equipment. These machines are typically for indoor use only and have the ability to be configured in an all bottle or can condition which would be considered the largest heat load and a worst case energy usage mode of operation. When these machines are configured in this orientation they closely resemble that of a Class A fully cooled refrigerated can and bottle vending machine. It would be imperative that these machines are required to be tested as fully cooled and in a max can / bottle capacity design orientation.

3. Qualification Criteria:

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Crane Merchandising Systems believes that the proposed threshold of 20% more stringent than the DOE legislation is aggressive and would like to see an additional review of the proposed MDEC for Type B machines.

Crane Merchandising Systems agrees that the MDEC for remanufactured vending machines should remain consistent with new machine regulation given the inability for the end user to determine the difference between a remanufactured and a new vending machine.

4. Test Method:

We agree with and support the alignment of the test method between the Energy Star Program and the DOE energy conservation standards.

5. Effective Date:

Given the similarity between the DOE regulation and the proposals covered under this draft the majority of equipment available for sale after the DOE affectivity date would require additional design work to meet the proposed Energy Star MDEC target of 20% more stringent than the DOE legislation. However, the ability for some manufacturers to achieve a level a re-design, test, and qualification in such limited amount of time may be unrealistic. We propose an implementation date of January 1st 2013 to allow additional time for manufacturers to develop appropriate designs to meet the proposed changes to the program.