



FELIX STORCH, INC.  
770 GARRISON AVE.  
BRONX, NY 10474

Phone: 718-893-3900  
Fax: 718-842-3093  
e-mail: paul@summitappliance.com

Amanda Stevens  
U.S. E.P.A.  
ENERGY STAR PROGRAM

Dear Ms. Stevens,

We are adding a few comments on the Residential Refrigerator Framework Document Version 5.

We oppose the sun setting of compact appliance categories. There are legitimate needs and markets for compact and specialty refrigeration, and the absence of differentiation would direct consumers to mass merchants and put some specialty firms out of business.

We also object to ENERGY STAR directing the use of a specific blowing agent. For smaller manufacturers and smaller product sales levels, it could be uneconomical or unavailable, and would preclude alternative technologies that may become available or may be more practical at smaller production levels.

While not specifically in the framework document, we urge ENERGY STAR to give consideration to the economic costs of certifying a product to ENERGY STAR standards. For smaller volume products, our company has faced instances where products meet ENERGY STAR, but we do not list the products because the cost of certification could not be recovered due to the small size of the market.

We appreciate the opportunity to submit comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Paul Storch". The signature is fluid and cursive, with the first name "Paul" and last name "Storch" clearly distinguishable.

Paul Storch  
Vice President