

August 9, 2011

Amanda Stevens
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program
Email: appliances@energystar.gov

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

Dear Ms. Stevens:

On behalf of SANYO E & E Corporation, I am writing today to provide our comments to the Environmental Protection Agency regarding the ENERGY STAR Residential Refrigerators and Freezers Version 5.0 Specification Framework Document.

SANYO E & E Corporation has been producing refrigeration products in multiple product classes for over 30 years. We support the efforts of the EPA and the Department of Energy to create incentives to improve the energy efficiency of many consumer and commercial products, and we appreciate the opportunity to offer our comments regarding the ENERGY STAR Residential Refrigerators and Freezers Version 5.0 Specification Framework Document.

1. PROPOSAL FOR REVISIONS AND/OR SUNSETTING OF CATEGORIES

In the Framework Document, the EPA requested feedback on whether the Agency should consider revisions to certain product categories with relatively low market share of ENERGY STAR products based on anticipated advances in the market in response to the 2014 standards; or alternatively, whether some of these product categories should be sunset in 2014 when new standards are in place. SANYO opposes the sunsetting of any categories. We support the EPA and the Department of Energy (DOE) in their efforts to provide incentives to manufacturers, retailers, and consumers for continual energy efficiency improvement. We believe it would be inappropriate to stop providing these incentives to certain product categories due to low market share relative to other categories.

2. REVISIONS TO THE MAXIMUM ANNUAL ENERGY USE

In the Framework Document, the EPA sought comment on the Agency's consideration of setting out-year criteria through this specification revision. SANYO is open to the concept of multiple phases ("tiers") of implementation. We are concerned about setting ENERGY STAR requirements in December 2012 at levels significantly higher than the new DOE baseline requirements taking effect in August 2014 or later.



3. OTHER CONSIDERATIONS

In the Framework Document, the EPA invited stakeholder comment on a potential requirement that ENERGY STAR qualified refrigerators be manufactured with low GWP foam blowing agents. SANYO opposes early implementation of a requirement to use low GWP foam blowing agents. We believe that implementing a low GWP requirement effective December 2012 or January 2013 would be unreasonable, as time to make investments and complete product development is inadequate. We feel the EPA proposal may be reasonable if more time is given for implementation.

We are grateful for the opportunity to submit our comments to the EPA in response to the Framework Document.

Respectfully yours,

A handwritten signature in cursive script, appearing to read "K. Maru", is positioned above the printed name.

Kenji Maru
President