

Gwen:

It seems that EPA regards consumer education to be the only way for them to save energy regardless of the type of thermostat they have on the wall. Whereas we, at Lux Products Corp., agree wholeheartedly that education is very important we also feel that if they have a modern, programmable thermostat operating their heating and cooling systems, customers are more likely to set the temperature up or back for fuel savings.

The academic studies used in EPA's decision logic, by and large, are old and the designs of the programmables used in the studies are probably decades older. Today's ENERGY STAR compliant programmables, manufactured by all stakeholders, are lightyears easier to program and, therefore, more likely to be used in the program mode than the ones in the studies. They don't even have to program them since they all have energy saving preset/default programs for both heating and cooling built in.

We are in favor of having an ENERGY STAR label based on existing, current specifications. Without some base level of compliance, the thermostat industry will be catapulted back 20 years. You would be endorsing the idea of the homeowner manually setting up and back their 30 year old mechanical thermostats with 6 degree temperature swings and mercury switches. You would be disregarding end users' comfort levels and automatic control that electronic programmable thermostats can, and do, provide.

Respectfully,
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