

To: Rachel Schmeltz
ENERGY STAR Program Manager
Office of Air and Radiation
United States Environmental Protection Agency
Washington, DC 20460

This is in response to your January 28, 2005 request for comments.

Aspen Manufacturing Inc. is an independent producer of split system, air conditioner and heat pump indoor sections. (Commonly: low sides.) We have 180 employees at our facility in Humble, Texas. Our products include an extremely wide variety of coils and air handlers, custom built to meet varying residential and light commercial construction practices across the country and differing efficiency requirements. In point of fact, we offer significantly more "low side" equipment variations and options than any OEM manufacturer of complete split systems. Many of those OEMs actually buy indoor sections from us or recommend us when their products cannot meet specific requirements.

Aspen is a member of ARI and our coils and air handlers are certified and listed with ARI in combination with outdoor sections by virtually all OEM manufacturers. Our listings are available at www.ariprimer.net.org.

We are currently not eligible to participate as an Energy Star Partner since, as we understand it, your definition of "matched systems" requires that indoor and outdoor split system sections be manufactured by the same company.

We would like to be a Partner, and ask what we can do in order to get the definition of "matched systems" broadened to include ARI listed combinations from two cooperating equipment sources. Thank you in advance for your consideration of this matter and we look forward to your advice as to how we should proceed.

Sincerely,

Richard J. Miller, Director of Marketing Aspen Manufacturing, Inc.