May 22, 2007

Mr. Richard Karney / DOE
Mr. James R.Siegel / D&R International

On behalf of Liebherr, I would like to thank you for the opportunity of commenting on the new proposed energy star levels.

While we fully agree that energy is a major concern and a critical priority, we have the following comments:

- Part of the market data provided should be compared with AHAM data. What really matters is market share.

- The suggested timeline is too stringent and will not allow manufacturers to implement real engineering improvements without causing a major impact on cost. In order to spur innovation a minimum of 18-24 months from publishing date should be provided.

- Most of our products already use variable speed compressors and many other energy saving features. The only way to improve efficiency and reach the new levels on some of the models would be to use vacuum panels, a very costly option.

- Because of the willingness of having a standard that is repeatable, the current standard does not allow for door openings. While this is understandable, there is energy saving features which have been clearly neglected because of the lack of proper incentives or recognition in the energy calculation. The best example is the use of LED lighting inside the refrigerator. It is time to promote these and credit manufacturers who invest in these costly features and technologies.

- The current marketing trends are already creating pressure and forcing manufacturers to push to the limit as climate change and global warming has become a major concern to the public.

Once again, while we support our common goal towards responsible use of energy, we believe that current engineering capabilities would struggle by a short term change in the levels to qualify for Energy Star. However, we believe that providing manufacturers with a 2 year time frame to do so is a reasonable time frame. And perhaps create a new Energy Star Plus level for those willing to take the challenge to reach the 25% mark.

Sincerely,
Liebherr Refrigeration

Marc Perez