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Ms. Rachel Schmeltz
Energy Star Program
U.S. Environmental Protection Agency
Washington, D.C.

Dear Rachel:

Carrier Corporation is pleased to provide the comments below regarding the proposed changes to Energy Star for residential central air conditioners and heat pumps.

EER Level

Carrier supports the 14 SEER draft level but urges EPA to consider 11.5 EER versus the proposed 12.0 EER level.

An Energy Star specification that is too restrictive will limit consumer choice and further degrade the current 7% market penetration of Energy Star products for central air conditioners and heat pumps. At 5-tons for example, no products in the ARI directory meet 14 SEER and 12 EER. A 12 EER requirement will also add cost to a unit and exacerbate the economic barrier to wider Energy Star penetration.

For these reasons, we urge 11.5 EER to enable sufficient consumer choice while maintaining the 14 SEER high efficiency level.

Quality Installation

Carrier commends EPA for considering the benefits of quality installations. We urge any approach to incorporate NATE. However, given the complexity of creating a quality installation and verification component of Energy Star, we urge EPA to postpone any requirement past January 2006 while allowing the revised efficiency levels to take effect. We recommend that EPA ask stakeholders such as ARI, ACCA and NATE to form a task group on this issue with EPA participation to fully evaluate all issues and options.

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Other Criteria

Carrier also commends EPA for considering the benefits of tight or sealed ductwork and matched system components. Both concepts offer the ability to insure rated efficiencies or capture greater energy savings.

EPA might consider a menu approach to Energy Star qualification for these other criteria. For example, one approach might include a 2-point system as follows:

1. Base SEER, EER and HSPF levels would be a mandatory 1-point.
2. A second required point could be secured by selecting from a menu of options to include items such as matched systems, duct sealing, installation by NATE technicians, etc.

Carrier is happy to work with EPA in the revision of the Energy Star Program and to respond to any questions on the points raised in this letter. We also look forward to reviewing and commenting on additional iterations of the proposed changes.

Sincerely,



John M. Mandyck