



December 21, 2011

U.S. Department of Energy
Office of the General Counsel
1000 Independence Avenue SW.,
Room 6A245.
Washington, DC 20585

Subject: Regulatory Burden RFI

Dear Sir or Madam,

In response to your request for input on unnecessarily burdensome regulations, I would like to comment on the "Energy Conservation Standards for Small Electric Motors". This regulation is very troubling for small fractional horsepower motor manufacturers. It would require us to purchase new design software, provide labor to redesign our products along with producing new manufacturing drawings and bills of material. We will also have to prepare prototypes which will be very expensive at one or two lot quantities, not to mention the cost of testing and validating temperature rise, performance and efficiencies. Assuredly a percentage of these prototypes will not perform as expected and will have to be re-designed, re-built and re-tested.

When the designs are completed, new tooling will be required to stamp thinner electrical steel laminations; new die cast tooling will be required to cast copper rotor bars (which will wear out significantly faster than aluminum dies). In addition to the tooling cost, manufacturing costs will also increase significantly. Winding cost and labor will increase due to increased slot fullness, lamination cost may well double due to thinner, higher grade material and increased lamination count, balancing time will increase due to additional rotor mass.

Overall motor cost for time and material will increase significantly, shipping weight and perhaps motor size will increase, putting us at a competitive disadvantage with respect to foreign sources. With higher prices more expensive freight and trying to recoup tooling cost, engineering cost, and lost opportunity cost, this standard may prove to be unachievable for a small business like ours with sales under \$50,000,000 despite being family owned for over 105 years.

Closing a plant and losing hundreds of jobs would be an enormous price to pay for the few kilo-watts saved in the fractional horsepower electric motor industry.

Thank you for your consideration.

A handwritten signature in black ink, appearing to read "James E. Marth", is written over a horizontal line.

James E. Marth
Vice President of Engineering
Bodine Electric Company

cc: John R. Bodine
Jeffrey P. Bodine