



Department of Energy

Washington, DC 20585

August 18, 2011

Ms. Leslie Jones
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Room 62023
Washington, DC 20460

Dear Ms. Jones:

On July 6, 2011, the United States Department of Energy (DOE) notified Friedrich Air Conditioning Company (Friedrich) that DOE had completed testing of the Friedrich room air conditioner models US12C10 and US10C30 under the ENERGY STAR Verification Testing Pilot Program and confirmed that the models did not meet the ENERGY STAR energy efficiency requirement of 10.7 EER. DOE gave Friedrich until July 26, 2011, to provide conclusive manufacturing or design evidence or quality assurance information on why DOE testing showed that these products did not meet the ENERGY STAR Program's energy efficiency requirement.

In a letter to DOE, Friedrich stated that DOE should have applied the capacity correction factor for barometric pressure reflected in Section 6.1.3 of ANSI/ASHRAI Standard 16-1983 (RA 2009) (Standard 16).¹ In Friedrich's view, if DOE had applied this correction to the units it initially tested, the units would have satisfied the ENERGY STAR Program's requirements and further testing by DOE would have been unwarranted.

Although not a part of the valid test procedure at the time of the test, DOE recalculated the test results from the initial units and three additional units of each model using Standard 16's capacity correction factor. The recalculated EER values still do not satisfy the ENERGY STAR Program's specifications. DOE tested one additional unit of each model using the DOE test procedure effective February 7, 2011, which includes Standard 16. The results from testing all five units of each model confirm that room air conditioner models US12C10 and US10C30 do not satisfy the ENERGY STAR Program's energy-efficiency specifications.

¹ As of February 7, 2011, DOE has amended its regulations to incorporate Standard 16 as the standard test procedure for room air conditioner energy efficiency certification testing. 76 FR 972, 975 (Jan. 6, 2011). The prior test procedure, which was valid when DOE tested the initial unit and three additional units, did not incorporate this capacity correction factor.



For these reasons, DOE has determined that Friedrich room air conditioner models US12C10 and US10C30 do not meet the ENERGY STAR requirements. Accordingly, DOE is referring this matter to EPA, the brand manager for ENERGY STAR, for appropriate action. Please feel free to contact Laura Barhydt, Assistant General Counsel for Enforcement, at 202-287-5772 should you require any further information.

Sincerely,



Timothy G. Lynch
Deputy General Counsel for
Litigation and Enforcement

cc: Mr. W. Patrick Kendrick, Friedrich Air Conditioning Co.
Mr. John Hodges, Esq., Counsel for Friedrich