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Via email to:

[ESTARVerificationTesting@ee.doe.gov](mailto:ESTARVerificationTesting@ee.doe.gov)  
[Certification@energystar.gov](mailto:Certification@energystar.gov).

InterMetro Industries welcomes the opportunity to comment on the DOE ENERGY STAR verification program as outlined in the April 2, 2011 DOE document. It appears for the select group of products (listed in Appendix A) that fall under both the EPA ENERGY STAR program verification and the DOE verification program that manufacturers will be subjected to two Federally mandated verification programs for the same product. This imparts an unnecessary burden on manufacturers to plan for, and to manage, two different programs.

InterMetro strongly urges that the EPA and DOE verification programs be merged into one so that manufacturers are not burdened with two Federal test programs.

Please note that InterMetro does not currently manufacture products which are covered by the Federal Conservation Standards but realizes the difficulty in having two programs. We also realize that in the future, products InterMetro produces may be covered by both the EPA and DOE programs.

Thank you for your consideration of our concerns.

Sincerely,

A handwritten signature in blue ink that reads "Willard Sickles".

Willard Sickles, P.E.  
Manager, Product Safety & Compliance Engineering

