

**SUPPORTING STATEMENT FOR
INFORMATION COLLECTION REQUEST:
“INFORMATION COLLECTION ACTIVITIES ASSOCIATED WITH
EPA’S ENERGY STAR® PRODUCT LABELING”**

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1 IDENTIFICATION OF THE INFORMATION COLLECTION

1.a TITLE OF THE INFORMATION COLLECTION

This ICR is entitled “ENERGY STAR® Product Labeling.” (EPA ICR No. 2078.02)

1.b SHORT CHARACTERIZATION/ABSTRACT

In April 1993, President Clinton issued the Climate Change Action Plan, which was designed to reduce U.S. emissions of greenhouse gases, while guiding the U.S. economy toward environmentally sound economic growth into the next century. EPA’s ENERGY STAR product labeling is an important part of the overall effort to reduce greenhouse gas emissions from projected 2000 levels by 19.4 million metric tons of carbon equivalent by 2010. ENERGY STAR is aimed at preventing pollution rather than controlling it after its creation.

This voluntary program was designed to create self-sustaining markets for energy-efficient products and services via a common labeling strategy and awareness campaign and through strategic market interventions designed to overcome barriers identified for designated product markets. In the 13 years since it was first established, ENERGY STAR has become a very successful program. A 2006 market survey by the Consortium for Energy Efficiency (CEE) reported that over 65% of US households recognize the ENERGY STAR label. Currently ENERGY STAR has over 1,700 manufacturing Partners and 40,000 qualifying product models. Partners see the ENERGY STAR label as a very useful and effective marketing tool for highlighting the energy efficiency of their products to consumers and others. In addition, ENERGY STAR provides Partners with recognition as environmental leaders.

ENERGY STAR is a program jointly administered by EPA and the Department of Energy. Each agency leads work on different product categories. Within EPA, the program is administered by the Climate Protection Partnerships Division (CPPD). This ICR covers only those activities undertaken by CPPD.

The program currently covers 47 products which fall into 33 broad product categories including the following:

- office equipment (computers, monitors, imaging equipment)
- consumer electronics (TVs, VCRs, home audio equipment, DVD products, set-top boxes, cordless telephones, cordless telephone/answering machine combination units, external power adapters, battery charging systems, digital-to-analog converter boxes)
- heating and cooling equipment (central air conditioners, air-source heat pumps, ground-source heat pumps, boilers, furnaces, programmable thermostats, ceiling fans, commercial air conditioners, commercial heat pumps, ventilating fans)
- lighting (indoor and outdoor residential lighting fixtures, exit signs)
- home envelope (roof products, insulation)
- appliances (dehumidifiers, room air cleaners)

- commercial foodservice (fryers, hot food holding cabinets, solid door refrigerators and freezers, steam cookers)
- water coolers
- vending machines

A limited number of additional products are expected to be added to the program in the future.

For the information collections, EPA assembles data from ENERGY STAR Partners. Partners are product manufacturers who wish to use the ENERGY STAR label to differentiate their product as having greater energy efficiency than others found in the market. Partners sign a new Partnership Agreement (PA) with EPA in order to become a Partner. In order to use the ENERGY STAR label on a product, the Partner must first determine if the product qualifies. Each product category covered by ENERGY STAR has a unique set of energy efficiency specifications that are used to determine qualification. In addition, a specific testing method must be used to determine qualification. All of this information is contained in the PA.

Partners are asked to submit qualifying product information to EPA so that EPA can, in turn, provide this information to consumers in an easy-to-use format so that they will know which products to purchase in order to save energy. In addition, Partners for roof product and residential light fixtures are requested to submit testing reports used to complete the qualifying product information in order to verify qualification. Partners may submit this information electronically or in hard-copy form. For some product categories (office equipment and consumer electronics), Partners are able to submit qualifying product information directly on-line via the On-line Products Submittal Tool (OPS). At minimum Partners are requested to submit updates to qualifying product information on an annual basis, so as to ensure that EPA information is recent and accurate. The information will be compiled into a complete qualifying products list per product category, posted on the ENERGY STAR Web site, and supplied to those purchasers who request it via phone, fax, or e-mail.

Partners are also asked to submit annual unit shipment data for their ENERGY STAR qualifying products. EPA is flexible as to the methods by which Partners may submit unit shipment data. For example, if Partners already submit this type of information to a third party, such as a trade association, they are given the option of arranging for shipment data to be sent to EPA via this third party to avoid duplication of efforts and to ensure confidentiality.

Finally, Partners that wish to receive recognition for their efforts in ENERGY STAR may submit an application for the Partner of the Year Award.

2 NEED FOR AND USE OF THE COLLECTION

2.a NEED/AUTHORITY FOR THE COLLECTION

Section 103(a) of the Clean Air Act authorizes EPA to establish “a national research and development program for the prevention and control of air pollution.” As part of such a program, EPA is to “conduct and promote the coordination and acceleration of research, investigations,

experiments, demonstrations, surveys, and studies relating to the causes, effects (including health and welfare effects), extent, prevention and control of air pollution.” Section 103(a)(1).

In addition, as a component of the program, section 103(g) directs the Administrator to “conduct a basic engineering research and technology program to develop, evaluate, and demonstrate nonregulatory strategies and technologies for air pollution prevention.” The section calls on the Administrator to provide opportunities for industry, public interest groups, scientists, and other interested persons to participate in strategy development. Section 103(g) further directs EPA to include as elements in the program “improvements in nonregulatory strategies and technologies for preventing or reducing multiple air pollutants including sulfur oxides, nitrogen oxides, heavy metals, PM-10 (particulate matter), carbon monoxide, and carbon dioxide...” The strategies and technologies are to improve various air pollutant reduction and nonregulatory control strategies, including energy conservation.

The ENERGY STAR Labeling Program is one component of the Administrator’s response. ENERGY STAR is a voluntary partnership between the U.S. EPA, the U.S. Department of Energy, product manufacturers, local utilities, and retailers. Partners help promote efficient products by labeling qualifying models with the ENERGY STAR label and educating consumers about the benefits. The label provides an easy way for consumers to identify energy-efficient products that save money on utility bills and help the environment. By using less energy, these products help reduce the demand to create power, which is typically generated by power plants that burn fossil fuels. As such, they help reduce greenhouse gas emissions that are generated by these stationary sources. ENERGY STAR demonstrates how providing consumer product information can be used as a nonregulatory strategy to reduce greenhouse gas emissions.

This information collection is designed to support and ensure the success of ENERGY STAR as a nonregulatory strategy for reducing greenhouse gas emissions.

In addition, in 2005, Congress enacted the Energy Policy Act. Section 131 of the Act amends Section 324 (42 USC 6294) of the Energy Policy and Conservation Act and requires, among other provisions, that the Administrator of the EPA and the Secretary of the Department of Energy work jointly 1) to promote ENERGY STAR compliant technologies as the preferred technologies in the marketplace for achieving energy efficiency and reducing pollution; 2) to enhance public awareness of the ENERGY STAR label; 3) to preserve the integrity of the ENERGY STAR label; 4) to regularly update ENERGY STAR product criteria; and 5) to solicit comments from interested parties prior to establishing or revising an ENERGY STAR product category or criterion.

This information collection is designed to support and ensure the success of ENERGY STAR as a nonregulatory strategy for reducing greenhouse gas emissions

2.b PRACTICAL UTILITY/USERS OF THE DATA

EPA uses information collected from ENERGY STAR Partners for a variety of purposes. These are described below:

Partnership Agreement

EPA uses information submitted in the PA to officially establish participation in ENERGY STAR. Partner data from PAs are also entered into the Integrated Strategic Tracking and Recruiting Database (iSTAR) that serves as a source of general information and as a mailing list.

Qualifying Product Information

EPA uses qualifying product information submitted by Partners to educate and build awareness among consumers as to which products meet the qualification of ENERGY STAR. Information submitted by Partners is entered into iSTAR, aggregated into a list and posted in the ENERGY STAR Web site. Consumers and institutional purchasers are directed to the ENERGY STAR Web site to locate model names and numbers of ENERGY STAR qualifying products.

Testing Reports

Submittal of testing reports is required by ENERGY STAR Partners for residential light fixtures and roof products. In the past, manufacturers in these two industries expressed mistrust of their competitors and questioned the integrity of the qualifying product information submitted. Partners asked that additional measures be taken to verify that qualifying product information is accurate and credible. As such, EPA requires the submission of testing reports from Partners in these two industries. All qualifying product information submitted for these two product categories must have accompanying testing reports or the product will not be considered ENERGY STAR qualified.

Unit Shipment Data

EPA uses unit shipment data supplied by Partners to monitor the progress of ENERGY STAR in stimulating the supply of and demand for energy efficient products in the market. This information is aggregated and used to evaluate ENERGY STAR overall to ensure continued success and benefits to Partners. In particular, this data is used to determine whether or not ENERGY STAR specifications need to be revised. For example, if the data shows that an overwhelming majority of the market meets the current specification levels, it may be appropriate for EPA to make the specification more stringent so that ENERGY STAR can continue to be used by Partners to highlight their more efficient products. On the other hand, if the data shows that no portion of the current market meets the current ENERGY STAR specification, it could indicate that the specification should be revised in other ways.

For each of the three years of the current ICR, EPA has received a 90% or better response rate from Partners in the collection of unit shipment data (90% in 2004, 92% in 2005, and 92% in 2006). As the submission of this data is an ENERGY STAR Partnership

requirement, Partners that do not fulfill the requirement are suspended from the program for a two month “grace period.” If after the grace period, the Partner has still not submitted data, their partnership is terminated. At the time of partnership termination, use of the ENERGY STAR name and logo must cease. Companies that wish to then recommit to ENERGY STAR must submit data for that year and complete a new Partnership Agreement.

The process used to collect unit shipment data (USD) is as follows:

- Early February: Send letter to Partners requesting USD and outlining collection process. Post letter and forms on Web site.
- Early February: Coordinate with previously identified Third Parties (typically trade associations) to collect and submit data on behalf of their members and others.
- Early March: Send reminder letter to Partners.
- March 31: Deadline for Partners to submit data.
- Early April: Suspend Partners that have not submitted data. Send notice to Partners to this effect. Give two month suspension period.
- May 30: Deadline to avoid partnership termination.
- Early June: Terminate partnerships with companies that have not submitted data. Send notice to companies to this effect.
- Mid-late June: Compile report of USD results

Partner of the Year Applications

EPA uses information in the Partner of the Year Application to provide public recognition to ENERGY STAR Partners that have initiated exemplary activities to educate the public and their employees about energy efficiency and ENERGY STAR

3 NONDUPLICATION, CONSULTATIONS, AND OTHER COLLECTION CRITERIA

The following sections verify that this information collection satisfies OMB's nonduplication and consultation guidelines, and does not duplicate another collection.

3.a NONDUPLICATION

The information to be obtained under this ICR has not been collected by EPA or any other federal agency. In addition, the requested information is based on a particular point in time; therefore, information that is not up-to-date is not sufficient. CPPD will ensure that information collected will not duplicate any ongoing recordkeeping or reporting functions required for participation in any of CPPD's programs.

3.b PUBLIC NOTICE REQUIRED PRIOR TO ICR SUBMISSION TO OMB

To comply with the Paperwork Reduction Act requirement that any agency developing a non-rule-related ICR solicit public comments for a 60-day period, EPA published a *Federal*

Register notice on Month Date, 2002 (72 FR XXXXX). The following comments were received on this notice:

3.c CONSULTATIONS

In preparing the respondent burden estimates for this ICR, EPA consulted with the following individuals:

NAME	ORGANIZATION	PHONE NUMBER	E-MAIL	PRODUCT
Mark Sharp	Panasonic	202-912-3800 x 116	sharpm@us.panaosnic.com	Home Electronics
Julie Humes	Lennox	972-497-5306	JULIE.HUMES@LennoxIntl.com	Heating and cooling equipment
John McGill	Victory Refrigeration	856-673-5185	j.mcgill@victory-refrig.com	Commercial refrigeration
Chris Primous	Progress Lighting	864-678-1000	cprimous@progresslighting.com	Residential light fixtures
Kevin Foley	Sika Sarnafil	800-856-9938	Foley.kevin@us.sika.com	Roof products
Robert White	Dell	512-728-6461	Robert.White@dell.com	Office equipment
Marty Marzinelli	Hewlett-Packard	208-396-3081	marty.marzinelli@hp.com	Office equipment
Mario Rufino	Canon	516-328-5610	mrufino@cusa.canon.com	Office equipment

As stated above, ENERGY STAR covers 33 broad categories of products. The majority of these categories are manufactured by the Partner companies consulted in preparing this ICR renewal. Several of these companies manufacture a variety of products that are covered by ENERGY STAR. For example, Panasonic has ENERGY STAR qualified products in six categories including audio/DVD products, computers, imaging equipment, cordless telephones, TV/VCRs, and ventilating fans. In addition, of the average 692 Partners in ENERGY STAR, the categories covered by the consulted Partners represent 70% of EPA's total ENERGY STAR Partners. EPA did not receive any additional information or comment through the Federal Register notice or any other sources that the burden estimate presented is incorrect.

3.d EFFECTS OF LESS FREQUENT COLLECTION

The development of a Partnership Agreement is a one-time information submittal; less frequent collection is not possible. Submission of information for each qualifying product is

required as a one-time information submittal; less frequent collection is not possible. However, at minimum annual updates, notifying EPA of any changes in qualifying product information, are required in order to ensure that EPA records reflect the most up to date information. Qualifying product information is posted on EPA's Web site and is provided to the public as requested, therefore annual updates are necessary to ensure that accurate information is disseminated.

EPA requires the submission of unit shipment data on an annual basis in order to monitor and evaluate the program annually to determine whether program adjustments are required to ensure continued program success and benefits to Partners.

Roof product and residential light fixture Partners are required to submit testing reports as they submit qualifying product information. Submission of test reports will be a one-time information request. New test reports will not be required as long as no changes have been made to the product that would affect its qualification with the ENERGY STAR criteria. It was determined that this additional information must be submitted by Partners of only these two product categories because of industry concerns regarding the validity of qualifying product information submitted. Submission of testing reports is seen as a way to verify the accuracy product information submitted by individual manufacturing Partners.

ENERGY STAR Partners may submit a Partner of the Year Award application annually. EPA requires this information to provide public recognition to Partners. However, Partners are not required to submit an award application.

3.e GENERAL GUIDELINES

Information collection performed under this clearance will follow all of OMB's General Guidelines regarding federal data collection.

3.f CONFIDENTIALITY

Participation in the ENERGY STAR Program is voluntary and may be terminated by Partners or EPA at any time. EPA does not expect that organizations will deem any information collected under the program to be confidential.

Any information submitted to EPA for which a claim of confidentiality is made will be safeguarded according to the Agency policies set forth in Title 40, chapter 1, part 1, subpart B – Confidentiality of Business Information (see 40 CFR part 2; 41 FR 36902, September 1, 1976; amended by 43 FR 40000, September 8, 1978; 43 FR 42251, September 20, 1978; 44 FR 17674, March 23, 1979).

3.g SENSITIVE QUESTIONS

The information collections do not ask sensitive questions, such as those pertaining to sexual attitudes or behavior or religious beliefs.

4 THE RESPONDENTS AND THE INFORMATION REQUESTED

4.a RESPONDENTS AND SIC CODES

Respondents for this information collection request include Partners in ENERGY STAR. Partners are product manufacturers. The following is a list of Standard Industrial Classification (SIC) codes for industry segments which are respondents to the information collections.¹

SIC	Industries
2679	Insulation, cellulose-mfpm-mfg
2952	Roof coatings (various)-mfg
3069	Roofing, single ply membrane: rubber-mfg
3211	Window glass, clear and colored-mfg
3259	Roofing tile, clay-mfg
3296	Insulation: rock wool, fiberglass, slag, and silica minerals-mfg
3433	Boilers, low-pressure heating: steam or hot water-mfg
3433	Furnaces, domestic: steam or hot water-mfg
3444	Roofing, sheet metal-mfg
3546	Power-Driven Handtools
3575	Computer terminals-mfg
3577	Optical scanning devices
3577	Printers, computer-mfg/Document entry conversion devices/Graphic displays
3577	Computer output to microfilm units, computer peripheral equipment-mfg
3579	Duplicating machines
3579	Mailing machines-mfg
3581	Vending machines for merchandise
3585	Dehumidifiers, except portable: electric-mfg
3585	Air-conditioning and heating combination units-mfg/Air-conditioning and heating combination units-mfg/Air-conditioning condensers and condensing units-mfg/Air-conditioning units, complete: domestic and industrial-mfg/Heat pumps-mfg (ASHPs)
3585	Heat pumps, electric-mfg
3585	Water coolers, electric-mfg
3589	Fryers/Food warming equipment/Cookers, steam
3634	Dehumidifiers, electric: portable-mfg
3634	Fans, household; electric, except attic fans-mfg
3634	Ventilating fans, electric: household-kitchen-mfg

¹U.S. Department of Labor. *Standard Industrial Classification (SIC) System Search*. Accessed on May 11, 2007 <http://www.osha.gov/pls/imis/sicsearch.html>.

	Light bulbs, electric: complete-mfg/Lamp bulbs and tubes, electric: incandescent filament, fluorescent, and vapor-mfg/Fluorescent lamps, electric-mfg
3641	
3645	Lighting fixtures, residential, electric-mfg
	Audio recorders and players: automotive and household-
3651	mfg
3651	Television receiving sets-mfg
	Television receiving sets - mfg/Video cassette
3651	recorders/players-mfg
3661	Facsimile equipment-mfg
	Telephone answering machines-mfg/Telephone central
	office equipment, dial and manual-mfg/Telephone sets,
3661	except cellular radio telephone-mfg
3663	Cable television equipment-mfg
	Television closed-circuit equipment/Television monitors-
	mfg/Television transmitting antennas and ground
3663	equipment-mfg
3679	Power supplies, static, and variable frequency
	Thermostats: air-conditioning, refrigeration, comfort
	heating, appliance-mfg
3822	
3861	Cameras
3861	Photocopy machines-mfg
3993	Electrical signs
4222	Storage, frozen or refrigerated goods
4939	Utilities, combination of
5078	Refrigerators, commercial: reach-in and walk-in wholesale
5211	Roofing material, dealers-retail
5722	AC units, self contained-retail
5731	Antennas/TV sets/VCRs-retail
5734	Computer/Printers, etc.-retail

4.b INFORMATION REQUESTED

Information is requested via the ENERGY STAR Partnership Agreement, Qualifying Product Information, Testing Report (required only for roof product and residential light fixture Partners), Unit Shipment Data, and Partner of the Year Application.

Partnership Agreement (PA)

i. Data Item

- Partner name
- Product for which they are partnering with EPA (checklist)
- Information on main contact person
- Information on marketing/PR contact person
- Signature of company official

Recordkeeping Item

There are no recordkeeping data items required pertaining to the Partnership Agreement.

ii Respondent Activity

- Review the instructions of the PA
- Complete and review information requested by the PA
- Submit the PA

Qualifying Product Information (QPI)

i Data Item

- Preparer's name
- Company name
- Product brand name and model number
- Product energy consumption information
- Other product specific information according to the requirements of the ENERGY STAR product specification
- Information about how the Partner is using the ENERGY STAR label – on products, packaging, Internet site, etc.

Recordkeeping Items

There are no recordkeeping data items required pertaining to QPI.

ii Respondent Activity

- Review instructions regarding QPI
- Complete and review QPI via On-line Product Submittal Tool (OPS) or hard copy/electronic form depending upon product category
- Submit QPI

Testing Report

i Data Item

- Product name and model number
- Results of testing according to ENERGY STAR product specification using in-house or Third Party testing facility

Recordkeeping Items

There are no recordkeeping data items required pertaining to testing reports.

ii Respondent Activity

- Review the testing guidelines found in the Partnership Agreement
- Determine which products to test
- Decide whether in-house capabilities exist or Third Party testing is required
- Perform testing in-house or via Third Party
- Compile testing results into testing report and review
- Submit testing report.

Unit Shipment Data

i Data Item

- Product brand name and model number
- Number of ENERGY STAR qualified units shipped that year
- Total U.S. shipments that year (requested but not required)

Recordkeeping item

There are no recordkeeping data items required pertaining to unit shipment data.

ii Respondent Activity

- Review instructions regarding unit shipment data
- Gather annual unit shipment data
- Compile data by product and review
- Submit unit shipment data form

Partner of the Year Application

i Data Item

- Name of the organization
- Information on the primary contact person
- Information on the communications contact
- Information on the award category

- Information on the number of products labeled
- Information on communication and outreach efforts
- Information on other special endeavors

Recordkeeping Item

There are no recordkeeping data items required pertaining to Partner of the Year award applications.

ii Respondent Activity

- Review the eligibility requirements and instructions on the application
- Gather data
- Complete and review the information and narrative descriptions required on the application
- Submit the application
- Submit original examples of communication materials

5 INFORMATION COLLECTED: AGENCY ACTIVITIES, COLLECTION METHODOLOGY, AND INFORMATION MANAGEMENT

5.a AGENCY ACTIVITIES

ENERGY STAR requires EPA to perform activities associated with the Partnership Agreement, Qualifying Product Information, Testing Reports, Unit Shipment Data, and Partner of the Year Applications. All of the following activities will be conducted by Headquarters staff in EPA's Climate Protection Partnerships Division, within the Office of Atmospheric Programs.

Partnership Agreement (PA)

EPA must perform the following activities related to the PA:

- Develop the PA
- Customize a PA for each company
- Disseminate the PA
- Review the completed PA
- Enter the information contained in the PA into the iSTAR database
- Develop and send a Welcome Aboard Pack (WAP) to the Partner

Qualifying Product Information (QPI)

EPA must perform the following activities related to QPI:

- Develop QPI to be submitted by Partners using OPS or hard copy/electronic form
- Disseminate QPI to Partners via the ENERGY STAR Web site and the WAP
- Review completed QPI submitted by Partner
- Enter QPI into the iSTAR database
- Compile all QPIs into a list per product type
- Post updated list on ENERGY STAR Web site
- Disseminate updated list as requested

Testing Report

EPA must perform the following activities related to testing reports submitted by roof product and residential light fixture Partners:

- Review testing report
- File for future review, as necessary

Unit Shipment Data

EPA must perform the following activities related to unit shipment data:

- Review unit shipment data submitted
- Compile information into aggregate data per product category
- Evaluate aggregate data to determine ENERGY STAR success and/or need for program adjustment

Partner of the Year Application

EPA must perform the following activities related to Partner of the Year applications:

- Develop the award criteria
- Disseminate the application via the ENERGY STAR Web site
- Review the submitted awards applications
- Send a letter of award or loss to applicant

5.b COLLECTION METHODOLOGY AND MANAGEMENT

In collecting and analyzing the information associated with this ICR, EPA will use a telephone system, personal computers, the Internet, and applicable database software. EPA will ensure accuracy and completeness of collected information by reviewing each submittal. EPA will enter the information obtained into a database and will aggregate data obtained in order to make that information available to the public and monitor the progress of program implementation.

5.c SMALL ENTITY FLEXIBILITY

EPA expects that small entities will participate in ENERGY STAR product labeling. EPA has designed information requirements to minimize respondent burden while obtaining sufficient and accurate information. In addition, the initial agreement to participate in the program is voluntary.

5.d COLLECTION SCHEDULE

EPA collects initial information in the Partnership Agreement, which is completed and submitted by every Partner participating in ENERGY STAR. Every manufacturing Partner is required to submit information on each of their qualifying products. Annual updates, notifying EPA of any changes in qualifying product information, are required as well. ENERGY STAR Partners for residential light fixtures and roof products are required to submit testing reports for each product determined to be qualified with the ENERGY STAR criteria. EPA also requires that manufacturing Partners submit information on their unit shipments of ENERGY STAR labeled products annually. Partners interested in receiving recognition for their efforts on ENERGY STAR are required to submit a Partner of the Year Award application.

6 ESTIMATING THE BURDEN AND COST OF THE COLLECTION

6.a ESTIMATING RESPONDENT BURDEN

EPA conducted consultations with ENERGY STAR Partners to estimate respondent burden hours for the activities covered by this ICR. Exhibit 1 presents the estimated annual respondent burden for information collection activities associated with ENERGY STAR product labeling.

6.b ESTIMATING RESPONDENT COSTS

Exhibit 1 presents the estimated annual respondent costs for information collection activities associated with ENERGY STAR product labeling. The estimated annual respondent costs are discussed below.

Estimating Labor Costs

The labor rates used to determine the estimated costs to respondents are consistent with the hourly wage rates published by the Bureau of Labor Statistics publications on employment and earnings.²³ Rates reflect a graded scale and include the cost of overhead and fringe benefits where appropriate. EPA estimates an average respondent hourly labor rate (hourly plus overhead) of \$119.35 for legal staff, \$101.67 for managerial staff, \$70.94 for technical staff, and \$40.67 for clerical staff.

Estimating Capital and Operations and Maintenance (O&M) Costs

EPA estimates that ENERGY STAR Partners may incur capital and operations and maintenance costs associated with specific activities. Respondents may incur capital costs in the average amount of \$2.14 associated with completing and reviewing the information requested in the Partnership Agreement.

Respondents will incur an average amount of approximately \$128 for various operations and maintenance costs to meet the information requirements of ENERGY STAR. These costs are for expenses such as photocopying, printing, creating binders, use of paper, and using express mailing services.

6.c ESTIMATING AGENCY BURDEN AND COSTS

EPA conducted consultations with their staff who work on ENERGY STAR product labeling to obtain agency burden hour estimates for all activities required by the Agency. The hourly labor rates used to determine the estimated costs to the Agency are consistent with hourly labor rates published in the Federal Register and are based on the 2007 GS pay schedule available from the Office of Personnel Management.⁴ EPA estimates an average hourly labor cost of \$71.34 for legal staff; \$66.72 for managerial staff; \$48.91 for technical staff; and \$19.65 for clerical staff. The labor costs are based on the following GS levels and steps: legal labor rates were based on GS Level 15, Step 1; managerial rates were based on GS Level 14, Step 4; technical labor rates were based on GS Level 12 Step 5; and clerical labor rates were based on GS Level 5, Step 1. EPA multiplied hourly rates by the standard government overhead factor of 1.6.

² U.S. Department of Labor, Bureau of Labor Statistics. *Employment Cost Index Historical Listing: Table 4*. May 7, 2007.

³ U.S. Department of Labor. *BLS Series Report*. Accessed on May 11, 2007 <http://data.bls.gov/cgi-bin/srgate>.

⁴ U.S. Office of Personnel Management. *2007 General Schedule (GS) Locality Pay Tables*. Accessed on May 11, 2007 <http://www.opm.gov/oca/07tables/indexGS.asp>.

EPA anticipates several instances of Agency O&M costs associated with ENERGY STAR product labeling information collection activities. To disseminate Partnership Agreements and Welcome Aboard Packs once signed Partnership Agreement are received from Partners, EPA anticipates a cost of \$2.07. This corresponds to the cost to mail a standard 9.5" x 12" manila envelope containing 30 pieces of paper via first class mail. In addition, EPA anticipates a cost of \$0.41 to mail a letter of award or loss to Partners who submit Partner of the Year applications.

Exhibit 2 shows the aggregate annual Agency burden and costs for the information collection activities associated with ENERGY STAR product labeling activities. The annual burden to the Agency is approximately 11,932 hours, at a cost of approximately \$468,724. The three-year, bottom-line burden for the life of this ICR is therefore 35,796 hours and \$1,406,172.

6.d ESTIMATING THE RESPONDENT UNIVERSE AND TOTAL BURDEN AND COSTS

Respondent Universe

The universe of each respondent activity varies depending upon the specific activity. The respondent universe for each information collection activity associated with ENERGY STAR product labeling is presented and explained separately below.

Partnership Agreement

One overarching Partnership Agreement has been developed by EPA for ENERGY STAR product labeling. It is expected that 292 new Partners will join each year for the three years of this ICR.

Qualifying Product Information

Thirty-three different product categories are covered by EPA under ENERGY STAR. Each product category has specific qualifying product information that must be submitted by each Partner for at least one qualifying product. Qualifying product information is expected for 9,986 qualifying products each year for the three years of this ICR. The qualifying product list for each product category is updated by the Agency once each month, for a total of 396 times annually (33 qualified product lists multiplied by 12 months in a year). Approximately twice each month the Agency receives a request for qualifying product information that cannot be fulfilled by the ENERGY STAR Web site, for a total of 792 requests.

Testing Reports

Testing reports are required to be submitted for qualifying products by roof product and residential light fixture Partners only. It is anticipated that qualifying product information for 4,464 new roof and residential light fixture products will be received by EPA each year for the three years of this ICR.

Unit Shipment Data

Each year, ENERGY STAR Partners are required to submit unit shipment data for their ENERGY STAR labeled products. There will be an average of 692 total Partners each year for the three-years of this ICR. Therefore, 692 reports of unit shipment data are expected each year for the three years of this ICR. Unit shipment data will be aggregated for each of the 33 product categories covered by EPA under ENERGY STAR.

Partner of the Year Award Application

One set of Partner of the Year award criteria are developed by the Agency each year and posted on the ENERGY STAR web site. An average of 17 Partner of the Year Award applications are expected each year for the three years of this ICR.

Total Burden and Costs

Exhibit 1 shows the aggregate annual respondent burden and costs for the information collection activities associates with ENERGY STAR product labeling. Estimated respondent burden hours are presented on a per respondent basis for the information collected under the Partnership Agreement, unit shipment data, and Partner of the Year application, and on a per qualifying product basis for qualifying product information and testing reports. The annual burden to the universe of respondent is approximately 89,150 hours, at a cost of approximately \$7,056,533. The three-year, bottom-line burden for the life of this ICR is therefore 267,450 hours and \$21,169,599.

6.e BOTTOM LINE BURDEN HOURS AND COSTS

Table 1 summarizes the total estimated annual burden hours and costs for respondents and for the Agency. The total cost for respondents is \$7,056,533 and the hourly burden is approximately 89,150 hours. The total cost for the Agency is \$468,724 and the hourly burden is approximately 11,932 hours. Table 1 displays these combined estimates, as well as the grand total of \$7,525,257 and the hourly burden of approximately 101,082 hours for all information collection activities under ENERGY STAR product labeling.

Table 1
Total Estimated Burden Hours and Costs for Respondents and EPA

	Burden Hours	Total Labor Costs/Year	Total Capital Costs/Year	Total O&M Costs/Year	Total Cost
Respondents	89,150	\$6,817,702	\$625	\$238,206	\$7,056,533
Agency	11,932	\$467,508	\$0	\$1,216	\$468,724
TOTAL	101,082	\$7,285,210	\$625	\$239,422	\$7,525,257

6.f REASONS FOR CHANGE IN BURDEN

EPA estimates a total annual respondent burden in this ICR, 2078.02 of 89,150 hours. This is an increase of approximately 18,483 hours from the previously approved ICR, 2078.01

Table 2 explains this 18,483-hour increase. Specifically the table presents the total annual hours estimate in ICR 2078.01 and ICR 2078.02 for each information collection (see columns 1-3). The table then compares their respective hours for each collection to derive the change in hours, and indicates whether this hour-change resulted from a program change and/or adjustment (see column 4). For example, there was an increase in testing report collections of approximately 44,052 hours, all of which resulted from an adjustment. The table also briefly describes the program change and/or adjustment (see column 5). Finally, the table sums up all hour changes to derive the total annual change in hours for all collections (see bottom row of the table).

The table shows that, of the 18,483-hour increase, all 18,483 hours resulted from adjustments. No hour changes resulted from program changes.

In the case of the Partnership Agreement and Qualifying Product Information, the number of anticipated responses increased dramatically from 118 in ICR 2078.01 to 292 in ICR 2078.02 and from 3112 in ICR 2078.01 to 9986 in ICR 2078.02, respectively. For Partnership Agreements, EPA revised the number of responses based on the experience of the past three years in which there has been a large growth in the number of companies becoming ENERGY STAR partners for both existing product categories and for new products categories (including battery chargers, external power adaptors, air cleaners, and vending machines). For Qualifying Product Information, EPA revised the number of responses based on the huge increase in new qualifying product information that is received each year. However, in both cases the number of hours per response decreased dramatically, from 10.76 hours in ICR 2078.01 to 4.20 hours in ICR 2078.02 for the Partnership Agreement and from 11.25 in ICR 2078.01 to 4.85 in ICR 2078.02 for Qualifying Product Information. This reduced hour burden is due to a streamlining of EPA's process for companies to join ENERGY STAR as Partners and submit their qualifying product information, including on-line access to information and forms via www.energystar.gov and the ability to complete and submit those forms electronically. Therefore, even with a vast

increase in the number of responses, the decrease in hour burden has resulted in a decrease in the total burden estimate of 43.28 hours for the Partnership Agreement and 13,481.31 hours for Qualifying Product Information.

For testing reports, the number of anticipated responses also increased dramatically from 654 in ICR 2078.01 to 4464 in ICR 2078.02. Again, EPA revised the number of responses based on the experience of the past three years in which there has been a large increase in the number of qualifying product information and accompanying testing reports for residential light fixtures and roof products. In this case, the number of hours per response also decreased from 30.25 to 14.30 due to a decrease in hours needed to perform the required information collection activities. The decrease is mostly attributed to Partners becoming accustomed to the requirements and what is needed to fulfill them. Although, the burden hours per response decreased, the number of responses increased to such a degree to yield a large increase in total burden of 44,051.71 hours.

The number of responses for the Unit Shipment Data collection activity decreased from 1143 in ICR 2078.01 to 692 in ICR 2078.02. EPA revised the number of responses based on the experience of the past three years during which the total number of ENERGY STAR Partners has decreased. This decrease is partially due to the enforcement of the partnership requirement to submit annual unit shipment data. As explained above, those Partners that do not fulfill this requirement have their partnership terminated. Although companies are allowed to recommit to ENERGY STAR by completing another Partnership Agreement, not all choose to do so. For this collection activity the number of hours per response has also decreased from 14.50 in ICR 2078.01 to 6.69 in ICR 2078.02. This decrease is again attributed to Partners' increased familiarity with the information being requested and the process involved in contrast to when the original ICR was approved. Due to both the decrease in number of responses and the hours per response resulted in a decrease in total burden of 11,942.04 hours.

For Partner of the Year applications, EPA revised the number of responses from 30 in ICR 2078.01 to 17 in ICR 2078.02 based on the experience of the past three years in which there was a decrease in the number of Partner of the Year applications submitted. However, the number of hours per response has increased from 37.01 in ICR 2078.01 to 59.29 in ICR 2078.02. This increase is attributed to the increased competition among those Partners that do submit applications. Partners appear to spend more time on the applications to better ensure that they will be chosen to receive a Partner of the Year award. Even with the increase in hours per response, the decrease in number of responses has yielded a slight decrease in total burden of 102.44 hours.

Table 2 Comparison of Total Annual Hours Under ICR 2078.01 and ICR 2078.02

(1) Information Collections	(2) Annual Hour Burden in ICR 2078.01	(3) Annual Hour Burden in ICR 2078.02	(4) Difference in Hour Burden Between ICR 2078.01 and 2078.02			(5) Description of Program Change and/or Adjustment
			Program Change	Adjustment	Total	
Partnership Agreement	1,269.68	1,226.40	0	(43.28)	(43.28)	EPA adjusted the number of respondents based on improved and updated data and analysis. The burden estimates in ICR 2078.02 reflect EPA's program experience gained over the past three years, as well respondents' experience.
Qualifying Product Information	31,930.00	18,448.69	0	(13,481.31)	(13,481.31)	EPA adjusted the number of respondents based on improved and updated data and analysis. The burden estimates in ICR 2078.02 reflect EPA's program experience gained over the past three years, as well respondents' experience.
Testing Reports	19,783.50	63,835.20	0	44,051.70	44,051.70	EPA adjusted the number of respondents based on improved and updated data and analysis. The burden estimates in ICR 2078.02 reflect EPA's program experience gained over the past three years, as well respondents' experience. The number also reflects that many more respondents have needed to fulfill this reporting requirement than was estimated under ICR 2078.01
Unit Shipment Data	16,573.50	4,631.46	0	(11,942.04)	(11,942.04)	EPA adjusted the number of respondents based on improved and updated data and analysis. The burden estimates in ICR 2078.02 reflect EPA's program experience gained over the past three years, as well respondents' experience.
Partner of the Year	1,110.30	1,007.86	0	(102.44)	(102.44)	EPA adjusted the number of respondents based on improved and updated data and analysis. The burden estimates in ICR 2078.02 reflect EPA's program experience gained over the past three years, as well respondents' experience.
Total	70,666.98	167,038.33	0	18,482.63	18,482.63	

6.g BURDEN STATEMENT

The estimated average annual respondent reporting and recordkeeping burden for this collection of information is 89.33 hours. The respondent reporting burden for each information collection activity for ENERGY STAR product labeling is presented separately below.

Partnership Agreement

The reporting burden for information collection requirements associated with completing the PA for each respondent is estimated to be 4.20 hours. This estimate includes times for reviewing the instructions on the PA, completing and reviewing the information requested by the PA, and submitting the PA.

Qualifying Product Information

The reporting burden for information collection requirements associated with completing the QPI for each qualifying product submitted by a respondent is estimated to be 4.85 hours. This estimate includes time for reviewing instructions regarding the QPI, completing and reviewing the QPI requested, and submitting the QPI via OPS or hard copy/electronic form.

Testing Report

The reporting burden for information collection requirements associated with testing reports by roof product and residential light fixture Partners for each qualifying product submitted by a respondent is estimated to be 14.30 hours. This estimate includes performing testing in house or by a Third Party, assembling the data into a report format, reviewing it and submitting it. Industry did not share detailed information on the cost of testing.

Unit Shipment Data

The reporting burden for information collection requirements associated with unit shipment data for each respondent is estimated to be 6.69 hours. This estimate includes reviewing instructions regarding unit shipment data, gathering unit shipment data compiling and reviewing unit shipment data by product category, and submitting unit shipment data.

Partner of the Year Application

The reporting burden for information collection requirements associated with the Partner of the Year Application for each respondent is estimated to be 59.29 hours. This estimate includes reviewing the eligibility requirements and instruction on the application, gathering data and information for submission, completing the application, reviewing the information and narrative description required, and submitting the application to EPA.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to or for a Federal Agency. This includes the time needed to review instructions; develop, acquire, install, and utilize technology and systems for the purposes of collecting, validating, and verifying information; adjust the existing ways to comply with any previously applicable instructions; search data sources; complete and review the collection of information; and transmit or otherwise disclose the information. An agency may not conduct or sponsor, and a person is not required to respond to,

a collection of information unless it displays a currently valid OMB control number. The OMB control numbers for EPA's regulations are listed in 40 CFR Part 9 and 48 CFR Chapter 15.

To comment on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including the use of automated collection techniques, EPA has established a public docket for this ICR under Docket ID No. OAR-2003-0033, which is available for public viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), EPA West, Room B102, 1301 Constitution Ave., NW, Washington, DC. The EPA Docket Center Public Reading Room is open from 8:30 a.m. to 4:30 p.m., Monday through Friday, excluding legal holidays. The telephone number for the Reading Room is (202) 566-1744, and the telephone number for the Air and Radiation Docket is (202) 566-1742. An electronic version of the public docket is available through EPA Dockets (EDOCKET) at <http://www.epa.gov/edocket>. Use EDOCKET to submit or view public comments, access the index listing of the contents of the public docket, and to access those documents in the public docket that are available electronically. Once in the system, select "search," then key in the docket ID number identified above. Also, you can send comments to the Office of Information and Regulatory Affairs, Office of Management and Budget, 725 17th Street, NW, Washington, DC 20503, Attention: Desk Office for EPA. Please include the EPA Docket ID No. (OAR-2003-0033) in any correspondence.

Exhibit 1: Estimated Annual Respondent Burden and Cost

Information Collection Activity	Hours and Costs Per Respondent/Qualifying Product								Total Hours and Costs		
	Legal	Manager	Technical	Clerical	Respond Hours/ Year	Labor Costs per Year	Annual Capital Startup Costs	Annual O&M Costs	Number of Respond./ Activities	Total Respond. Hours/Year	Total Cost/Year
Hourly rate	\$ 119.35	\$ 101.67	\$ 70.94	\$ 40.67							
Partnership Agreement (PA)											
Review the instructions of the PA	0.75	0.63	0.25	0.13	1.75	\$ 175.88	\$ -	\$ 1.65	292	511.00	\$ 51,837.30
Complete and review the information requested by the PA	0.50	0.63	0.47	0.13	1.72	\$ 159.01	\$ -	\$ 0.74	292	501.88	\$ 46,648.83
Submit the PA	0.25	0.20	0.22	0.06	0.73	\$ 68.23	\$ 2.14	\$ 0.37	292	213.53	\$ 20,657.72
Subtotal	1.50	1.45	0.94	0.31	4.20	\$ 403.12	Varies	Varies	Varies	1,226.40	\$ 119,143.84
Qualifying Products Information (QPI) via On-line system or hard copy/electronic form depending upon product category											
Review instructions regarding QPI	0	0.75	1.25	1.01	3.01	\$ 206.11	\$ -	\$ 0.74	33	99.41	\$ 6,826.00
Complete and review the QPI requested	0	0.45	0.81	0.19	1.45	\$ 111.02	\$ -	\$ 3.71	9,986	14,479.70	\$ 1,145,677.55
Submit the QPI	0	0.14	0.06	0.19	0.39	\$ 26.04	\$ -	\$ 0.37	9,986	3,869.58	\$ 263,732.76
Subtotal	-	1.34	2.13	1.39	4.85	\$ 343.16	Varies	Varies	Varies	18,448.69	\$ 1,416,236.31
Testing Report (as required)											
Perform testing either in house or through third party	0	2.5	10	0.5	13	\$ 983.91	\$ -	\$ 35.64	4464	58,032.00	\$ 4,551,271.20
Assemble testing data into report format and review	0	0.5	0.5	0	1	\$ 86.31	\$ -	\$ 1.70	4464	4,464.00	\$ 392,841.57
Submit testing report	0	0.05	0.25	0	0.3	\$ 22.82	\$ -	\$ 0.85	4464	1,339.20	\$ 105,668.94
Subtotal	0	3.05	10.75	0.5	14.30	\$ 1,093.03	Varies	Varies	Varies	63,835.20	\$ 5,049,781.70
Unit Shipment Data (USD) of ENERGY STAR Products											
Review instructions regarding USD	0.13	0.97	0.38	0.06	1.54	\$ 142.56	\$ -	\$ 0.41	692	1059.63	\$ 98,934.16
Gather unit shipment data	0	1.50	2.43	0.29	4.21	\$ 351.33	\$ -	\$ 6.60	692	2,916.29	\$ 247,685.21
Compile and review USD by ENERGY STAR product category	0.25	0.89	0.43	0.43	2.00	\$ 168.45	\$ -	\$ 3.30	692	1,384.00	\$ 118,849.02
Submit data	0	0.34	0.11	0.04	0.49	\$ 43.19	\$ -	\$ 0.41	692	331.17	\$ 30,169.67
Subtotal	0.38	2.73	2.96	0.75	6.69	\$ 562.96	Varies	Varies	Varies	4,631.46	\$ 396,703.90
Partner of the Year Application											
Review the eligibility requirements and instructions on application	0.13	2.6	1.13	2.21	6.07	\$ 446.22	\$ -	\$ 0.85	17	102.61	\$ 7,600.14
Gather data	0.25	2.6	10.88	9.57	23.27	\$ 1,452.02	\$ -	\$ 33.94	17	395.55	\$ 25,261.32
Complete and review the information and narrative descriptions required	1.000	8.3	8.38	2.57	20.23	\$ 1,660.46	\$ -	\$ 26.40	17	343.95	\$ 28,676.64
Submit the application	0	3.6	0.50	1.18	5.28	\$ 446.51	\$ -	\$ 3.28	17	89.25	\$ 7,646.45
Submit original examples of communications materials	0	1.4	1.50	1.57	4.57	\$ 315.56	\$ -	\$ 6.97	17	76.50	\$ 5,482.99
Subtotal	1.38	18.43	22.38	17.11	59.29	\$ 4,320.77	Varies	Varies	Varies	1007.86	\$ 74,667.53
TOTAL	3.25	26.99	39.15	20.06	89.33	\$ 6,723.04	Varies	Varies	Varies	89,149.60	\$ 7,056,533.29

Exhibit 2: Estimated Annual Agency Burden and Cost

Information Collection Activity	Agency Hours and Costs Per Respondent/Qualifying Product								Total Hours and Costs		
	Legal	Managerial	Technical	Clerical	Agency Hours/Year	Labor Costs/Year	Ann. Capital Costs	Annual O&M Costs	No. of Resp./Activities	Total Hours/Year	Total Cost/Year
Hourly Rate	\$ 71.34	\$ 66.72	\$ 48.91	\$ 19.65							
Partnership Agreement (PA)											
Develop the PA	5	25	50	70	150	\$ 5,845.70	0	\$ -	1	150	\$ 5,845.70
Customize PA for a company	0	0	0.5	0	0.5	\$ 24.46	0	\$ -	292	146	\$ 7,140.86
Disseminate the PA	0	0	0	0.25	0.25	\$ 4.91	0	\$ 2.07	292	73	\$ 2,038.89
Review the completed PA	0	0.25	0.25	0	0.5	\$ 28.91	0	\$ -	292	146	\$ 8,440.99
Enter the information contained in the PA into STAR database	0	0	0	0.5	0.5	\$ 9.83	0	\$ -	292	146	\$ 2,868.90
Develop and send a Welcome Aboard Pack	0	0	0	0.75	0.75	\$ 14.74	0	\$ 2.07	292	219	\$ 4,907.79
Subtotal	5	25.25	50.75	71.5	152.5	\$ 5,928.54	0	Varies	Varies	880	\$ 31,243.13
Qualifying Products Information (QPI)											
Develop QPI to be submitted by Partners	0	0.5	1.5	0	2	\$ 106.73	0	\$ -	33	66	\$ 3,521.93
Disseminate QPI via the Internet and in the Welcome Aboard Pack	0	0	0.25	0	0.25	\$ 12.23	0	\$ -	33	8.25	\$ 403.51
Review the completed QPI submitted by Partner	0	0	0.25	0	0.25	\$ 12.23	0	\$ -	9986	2496.5	\$ 122,103.82
Enter the information contained in the QPI into STAR database	0	0	0	0.25	0.25	\$ 4.91	0	\$ -	9986	2496.5	\$ 49,056.23
Compile all QPIs into total list per product type	0	0	1	0	1	\$ 48.91	0	\$ -	396	396	\$ 19,368.36
Post updated list on webpage	0	0	0.25	0	0.25	\$ 12.23	0	\$ -	396	99	\$ 4,842.09
Disseminate updated list as requested	0	0	0.25	0	0.25	\$ 12.23	0	\$ -	792	198	\$ 9,684.18
Subtotal	0	0.5	3.5	0.25	4.25	\$ 209.46	0	Varies	Varies	5686	\$ 208,980.10
Testing Report (as required)											
Review testing report	0	0	0.5	0	0.5	\$ 24.46	0	\$ -	4464	2232	\$ 109,167.12
File for future review as necessary	0	0	0	0.25	0.25	\$ 4.91	0	\$ -	4464	1116	\$ 21,929.40
Subtotal	0	0	0.5	0.25	0.75	\$ 29.37	0	Varies	Varies	3348	\$ 131,096.52
Unit Shipment Data for ENERGY STAR Products											
Review unit shipment data	0	0	2	0	2	\$ 97.82	0	\$ -	692	1384	\$ 67,691.44
Compile information in aggregate form per product	0	0	2	4	6	\$ 176.42	0	\$ -	33	198	\$ 5,821.86
Evaluate aggregate data to determine program success	0	4	2	0	6	\$ 364.70	0	\$ -	33	198	\$ 12,035.10
Subtotal	0	4	6	4	14	\$ 638.94	0	Varies	Varies	1780	\$ 85,548.40
Partner of the Year Application											
Develop the award criteria	0	4	10	1.5	15.5	\$ 785.46	0	\$ -	1	15.5	\$ 785.46
Disseminate the application (post on web site)	0	0	4	6	10	\$ 313.54	0	\$ -	1	10	\$ 313.54
Review submitted awards application	0	2	10	0	12	\$ 622.54	0	\$ -	17	204	\$ 10,583.18
Send a letter of award or loss	0	0	0	0.5	0.5	\$ 9.83	0	\$ 0.41	17	8.5	\$ 174.00
Subtotal	0	6	24	8	38	\$ 1,731.36	0	Varies	Varies	238	\$ 11,856.17
TOTAL	5	35.75	84.75	84	209.5	\$ 8,537.66	0	Varies	Varies	11932	\$ 468,724.32