

**SUPPORTING STATEMENT FOR
INFORMATION COLLECTION REQUEST:
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 “EPA’s ENERGY STAR® Product Labeling (Renewal).” (EPA ICR No. 2078.05, OMB Control Number 2060-0528)

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 18 years since it was first established, ENERGY STAR has become a very successful program. A 2009 market survey by the Consortium for Energy Efficiency (CEE) reported that more than 75% of US households recognize the ENERGY STAR label and 80% indicate that the ENERGY STAR logo influences their purchasing decision and likeliness to recommend a product to others. Thus, even though participation in the ENERGY STAR program is voluntary, most producers seek to satisfy its criteria. Currently ENERGY STAR has over 2,000 manufacturing Partners covering more than 40,000 qualifying product models in 63 product categories. 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 product labeling program for which EPA is now the lead administrator across all product categories. In September, 2009, EPA and DOE signed a new Memorandum of Understanding that updated the existing 10 year old agreement and readdressed ENERGY STAR product labeling responsibility to the EPA. In December 2009, DOE and EPA shared the Enhanced Program Plan for ENERGY STAR Products with thousands of stakeholders. This plan identified enhanced testing in connection with the ENERGY STAR label.

Within EPA, the program is administered by the Climate Protection Partnerships Division (CPPD). The program currently covers 63 products including the following:

- office equipment (computers, displays, imaging equipment)
- enterprise equipment (servers, storage, uninterruptable power supplies)
- consumer electronics (TVs, home audio equipment, DVD products, set-top boxes, cordless telephones, cordless telephone/answering machine combination units, battery charging systems,)

- heating and cooling equipment (boilers, central air conditioners, air-source heat pumps, geothermal heat pumps, furnaces, climate control mechanisms, ceiling fans, commercial air conditioners, commercial heat pumps, ventilating fans)
- lighting (compact fluorescent and solid state lighting, indoor and outdoor residential lighting fixtures, decorative light strings)
- home envelope (roof products, insulation)
- domestic appliances (refrigerators, freezers, clothes washers, dishwashers, dehumidifiers, room air cleaners)
- commercial foodservice (fryers, hot food holding cabinets, refrigerators and freezers, steam cookers, ovens, griddles, dishwashers, ice machines)
- water coolers
- vending machines

A number of additional products are expected to be added to the program in the future as well as increased number of revisions of existing specification to assure that the label remains relevant as a differentiator of efficient products within each category.

However, maintaining the value of this brand requires ensuring products labeled with the ENERGY STAR deliver on their promise to the consumer. The program has evolved to the point where continuing to rely on a supplier's declaration that a product meets the ENERGY STAR criteria is insufficient. In March 2010, EPA launched its stakeholder process to develop detailed enhanced testing and verification for ENERGY STAR products. In June 2010, EPA posted the final criteria and conditions for recognizing accreditation bodies and recognition of laboratories and in August 2010 EPA posted the final criteria and conditions for recognizing certification bodies. Starting January 1, 2011 EPA will be requiring products to be tested for qualification in an EPA-recognized laboratory through participation in a third-party certification program. These changes to the ENERGY STAR strengthen the procedures to better ensure that products bearing the ENERGY STAR label in fact meet the ENERGY STAR criteria.

For the information collection, EPA's recognized certification body will assemble and provide EPA with data obtained as a result of the certification service they provide 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 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 ENERGY STAR Program requirements.

Instead of providing information directly to EPA based on their self-declaration that their products meets ENERGY STAR efficiency criteria, Partners are now asked to obtain third party certification prior to labeling products. The Certification Bodies provides EPA with a list of products certified to meet the prescribed efficiency criteria. EPA, in turn, provides the relevant information to consumers in an easy-to-use format so that they will know which products to purchase in order to save energy. 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.

As a change from how the program used to operate in the previous collection, Partners must now obtain notice of certification from a certification body BEFORE they may label a product. These changes are an effort to preserve the consumer confidence in the ENERGY STAR label and to protect the significant value it offers program partners. EPA believes that the new requirements will mean that leadership companies' participation and the ENERGY STAR label will become even more meaningful in the market. Maintaining the value of this brand requires ensuring products labeled with the ENERGY STAR deliver on their promise to the consumer.

While most products-related information will be provided by certification bodies going forward, partners are asked to submit to EPA 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 non-regulatory 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 non-regulatory 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 non-regulatory 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, 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 non-regulatory strategy to reduce greenhouse gas emissions.

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

2.b PRACTICAL UTILITY/USERS OF THE DATA

EPA uses collected information 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. EPA now requires that manufacturing Partners obtain third party certification to new products prior to product labeling. Before EPA considers a product qualified, the Certification bodies must certify the products performance. Information submitted by certification bodies is aggregated into a qualified product 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. In the past, questions concerning the integrity of the qualifying product information submitted necessitated EPA to alter the program participation requirements.

Application to be recognized by EPA

In order to serve as an accreditation body, a recognized test facility, or a certification

body, organizations must provide EPA with relevant information for each of these key entities in our enhanced testing and verification program.

Third Party Certified Product Information

In order for product to be labeled as ENERGY STAR, the manufacturer must obtain third-party certification of the product's performance. The third party certification body must be recognized by EPA and base its certification on testing that was performed in an EPA-recognized laboratory. Once a product has been certified, the certification body reports the model number, along with a range of other identifying and performance information to EPA so that EPA may authorize use of the logo (in first instance) and list the product on the relevant ENERGY STAR qualified product list.

EPA uses this data primarily to document and inform consumers about which products qualify for the ENERGY STAR label, fulfilling a fundamental purpose of the program – making it easy for consumers to identify and choose energy efficient products that are good for the environment. This data also informs the process by which ENERGY STAR performance specifications are established, factoring in to EPA's assessment of whether and how the ENERGY STAR label can continue to effectively differentiate products in the market (see principle number 6 below.)

To develop ENERGY STAR product specifications, EPA uses a systematic framework to

- assess the feasibility for applying the label to a product category;
- to develop performance specifications that must be met in order to earn the label; and
- to reassess performance specifications as market conditions change.

This process relies on rigorous market, engineering, and pollution savings analyses as well as input from industry and other stakeholders. To ensure that the ENERGY STAR label remains an effective consumer tool, EPA strives to ensure that the resulting performance-based specifications identify energy-efficient products whose use results in reasonable financial return without sacrificing product performance or features.

EPA follows a set of six key principles when establishing or updating an ENERGY STAR specification. The ultimate viability and environmental impact of an ENERGY STAR specification in the marketplace depends upon many factors. In reaching a final judgment in terms of where to “set the bar” for ENERGY STAR, EPA employs an iterative process to achieve the desired balance among the principles. The success of a specification can be more reasonably assured through the application of these principles.

1. Significant energy savings can be realized on a national basis

Product categories covered by ENERGY STAR can contribute significant energy savings nationwide. An ENERGY STAR specification can achieve sizable energy savings from a product category where there are significant savings on a unit basis and limited annual unit sales or, where there are relatively small energy savings on a unit basis, but very large annual unit sales. The goal is to create ENERGY STAR specifications for only those product categories where it is clear that the energy savings potential of a product

will translate into tangible energy savings when the product is placed in a home or building.

2. Product performance can be maintained or enhanced with increased energy efficiency

EPA seeks to maintain the ENERGY STAR label as an attractive purchasing tool for a broad array of consumers. This is accomplished by ensuring that the label is not only a credible symbol for energy efficiency, but that it is also found on products with the features and performance that consumers demand. EPA would not expect consumers to choose the more efficient products if it required sacrificing performance, functionality or other non-energy-related features. EPA continues to examine factors such as safety, performance, warranty, and others, when establishing and revising performance-based specifications, to ensure that product quality, features, and functionality are not compromised.

3. Purchasers will recover their investment in increased energy efficiency within a reasonable period of time

Some energy-efficient products may have a price premium while others do not. In evaluating the cost effectiveness of a specification for ENERGY STAR qualified products, EPA examines the additional cost of energy saving technologies for the manufacturer as well as any incremental costs associated with the increased efficiency of products and the price of energy. EPA may also consider the prevalence of rebates or other incentives for the purchase of energy-efficient products in evaluating cost effectiveness. ENERGY STAR specifications are set so that if there is a cost differential at time of purchase, that cost is recovered through utility bill savings, generally within two-three years.

4. Energy-efficiency can be achieved through broadly available, non-proprietary technology offered by more than one manufacturer

ENERGY STAR is an effective marketing tool that conveys a business advantage to manufacturers that use it. As such, EPA is careful not to favor one manufacturer over all others by designating a proprietary technology or unique design approach when establishing or revising the performance attributes of an ENERGY STAR product specification. To ensure that specifications are set so that more than one manufacturer can meet them with at least one of their product models, EPA considers many factors, such as number of companies that manufacture a product type, availability, variety, and cost-competitiveness of energy-saving technologies, and any proprietary or exclusive nature of any technologies in use.

5. Product energy consumption and performance can be measured and verified with testing

Product testing is important as it yields accurate and repeatable energy consumption values for potentially qualifying products. Product testing also assures that labeled products are performing at the appropriate levels and delivering on ENERGY STAR's promise to consumers. When assessing the viability of a product category to be covered by ENERGY STAR, and when developing and revising performance-based

specifications, EPA makes every effort to choose energy performance metrics for which an industry accepted test procedure exists and is in use by manufacturers.

6. Labeling would effectively differentiate products and be visible for purchasers

EPA sets and revises specifications such that they may be met by only the most efficient products. This level typically represents approximately the top quartile of products currently available in the market at the time the specification is initially set. In situations where the top quartile of models reflects a cost premium that cannot be recouped through energy savings in a reasonable time, a less stringent specification may be warranted. On the other hand, in some cases, very few models may meet the ENERGY STAR specification when it is initially set. Through research and analysis prior to setting the specification, EPA may conclude that manufacturers could implement relatively simple design changes to modify product models to enhance their energy-efficiency. For example, the addition of insulation and timers on water coolers were considered very feasible and likely the only prerequisites needed to meet the ENERGY STAR specifications. With these design changes, sufficient numbers of models will qualify and ENERGY STAR will identify the more efficient products on the market.

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 (91% in 2007, 96% in 2008, and 96% in 2009). 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 non-duplication 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 October 5, 2010 (75 FR 61481). No comments were received on these notices.

3.c CONSULTATIONS

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

NAME	ORGANIZATION	PHONE NUMBER	E-MAIL	PRODUCT
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Mark Sharp	Panasonic	202-912-3800 x 116	sharpm@us.panaosnic.com	Home Electronics
Julie Humes	Lennox	972-497-5306	JULIE.HUMES@LennoxIntl.com	HVAC 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

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. Once a specification is revised, Partners must recommit to the program, this is additional as-needed submittal. Application for recognition for each accreditation body, laboratory, and certification body is required as a one-time information submittal; less frequent collection is not possible. Qualifying product information is posted on EPA’s Web site every two weeks based on updated information provided by the certification bodies on recently reviewed and certified product data . This information is provided online, as well as requested.

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.

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
3585	Air-conditioning and heating combination units-mfg/Air-conditioning condensers and condensing units-mfg/Air-conditioning units,

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

	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
3632	Domestic refrigeration
3633	Domestic Laundry,
3634	Dehumidifiers, electric: portable-mfg
3634	Fans, household; electric, except attic fans-mfg
3634	Ventilating fans, electric: household-kitchen-mfg
3639	Misc household appliances
	Light bulbs, electric: complete-mfg/Lamp bulbs and tubes, electric: incandescent filament, fluorescent, and vapor-mfg/Fluorescent lamps, electric-mfg
3641	Lighting fixtures, residential, electric-mfg
3648	Misc lighting (CFL/SSL)
3651	Audio recorders and players: automotive and household-mfg
3651	Television receiving sets-mfg
3651	Television receiving sets - mfg/Video cassette recorders/players-mfg
3661	Facsimile equipment-mfg
	Telephone answering machines-mfg/Telephone central office equipment, dial and manual-mfg/Telephone sets, except cellular radio telephone-mfg
3661	Telephone-mfg
3663	Cable television equipment-mfg
	Television closed-circuit equipment/Television monitors-mfg/Television transmitting antennas and ground equipment- mfg
3663	mfg
3679	Power supplies, static, and variable frequency
	Thermostats: air-conditioning, refrigeration, comfort heating, appliance-mfg
3822	appliance-mfg
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, Applications for Recognition, 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 and commitment form)
- 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

Application for EPA Recognition

i Data Item

- Organization's name
- Organization's address
- Organization's name
- Contact name, address, email, phone
- Preparer's name, title, date
- Certification body relevant reference documents

Recordkeeping Items

The accreditation body must maintain a record of quality management documentation as required by ISO 17011.

The laboratory must maintain a record of their accreditation certificate and scope of accreditation

The certification body must maintain a record of their accreditation certificate and scope of accreditation

ii Respondent Activity

- Review the instructions in the Application for recognition
- Complete and review information requested in the application
- Submit the application

Third Party Certified Product Information

i Data Item

- Company Name
- Product Name and model number

- Product energy consumption attributes
- Other key product specific information according to the relevant ENERGY STAR product Eligibility Requirements

Recordkeeping Items

There are no recordkeeping data items required pertaining to third party certification

ii Respondent Activity

- Review the testing requirements found in the Eligibility Criteria in each relevant specification
- Determine whether product meets relevant ENERGY STAR performance criteria
- Compile list of qualified models with relevant efficiency data

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, Recognition of accreditation bodies, Recognition of laboratories, Recognition of certification bodies, 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
- Sign PA
- Enter the information contained in the PA into the iSTAR database
- Develop and send a Welcome Aboard Pack (WAP) to the Partner

Applications for recognition

EPA must perform the following activities related to recognition of these entities

- Develop application to be submitted by ABs, CB, and Labs using hard copy/electronic forms
- Disseminate applications to interested entities via the ENERGY STAR Web site
- Process and approve applications for EPA recognition of accreditation bodies, labs and certification bodies
- Post updated recognized entities on ENERGY STAR Web site

Third Party Certified Product Information

EPA must perform the following activities related to certified product information:

- Maintain general oversight of certification bodies
- Enter appropriate model data into database
- Compile all qualified model data into a list per product type

- Post updated lists on ENERGY STAR web site
- Disseminate updated list as requested

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. In order to be recognized by EPA as an ENERGY STAR appropriate certification body, laboratory and accreditation body, entities must provide EPA with the relevant documentation to provide assurance of their competence to perform these tasks. 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

In developing the respondent's burden associated with the partners responsibilities, during the last ICR renewal EPA conducted consultations with ENERGY STAR Partners to estimate the 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.² Rates reflect a graded scale and include the cost of overhead and fringe benefits where appropriate. EPA estimates an average increase of 7% from the previous ICR submission. The resulting respondent hourly labor rate (hourly plus overhead) of \$127.70 for legal staff, \$108.79 for managerial staff, \$75.91 for technical staff, and \$43.52 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.

Partners 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

² U.S. Department of Labor. *BLS Series Report*. Accessed on September 23, 2010
http://www.bls.gov/oes/current/oes_nat.htm#23-0000.

Employment Cost Index for wages and salaries, for private industry
<http://www.bls.gov/news.release/eci.t09.htm>

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 2010 GS pay schedule available from the Office of Personnel Management.³ EPA estimates an average hourly labor cost of \$76.38 for legal staff; \$71.42 for managerial staff; \$52.37 for technical staff; and \$21.02 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.

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 \$0.44 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 19,064 hours, at a cost of approximately \$462,385. The three-year, bottom-line burden for the life of this ICR is therefore 57,192 hours and \$1,387,155.

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 100 new Partners will join and 1300 recommit each year for the three years of this ICR.

Application for Recognition

The universe of accreditation bodies and certification bodies is quite limited, with at the most 20 Accreditation Bodies and 30 Certification bodies eligible to apply for recognition. The universe of manufacturer laboratories seeking recognition of in house testing facilities varies depending upon the specific product categories, but EPA estimates that approximately 60

³ U.S. Office of Personnel Management. *2010 General Schedule (GS)Base*. Accessed on September 23, 2010. http://www.opm.gov/oca/10tables/html/gs_h.asp.

labs will seek EPA recognition. As this program requirement matures, EPA expects the number of certification bodies and accredited laboratories to increase slightly.

Third Party Certified Product Information

Sixty three different product specifications are developed and maintained by EPA under the ENERGY STAR product labeling program. Each product category has specific qualifying product information that must be submitted by the certification body. Annually 25,000 new products are qualified and labeled with the ENERGY STAR label. The qualifying product lists for each product category are updated by the Agency twice a month.

Unit Shipment Data

Each year, ENERGY STAR Partners are required to submit unit shipment data for their ENERGY STAR labeled products. There is an average of over 2050 Partners each year for the three-years of this ICR. From these 2050 partners, we received over 2000 unit shipment reports each year for the three years of this ICR. Unit shipment data will be aggregated for each of the 63 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 140 Partner of the Year Award applications is 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. The annual burden to the universe of respondent is approximately 65,338 hours per year at a cost of approximately \$4,344,125.

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 \$4,344,125 and the hourly burden is approximately 65,338 hours. The total cost for the Agency is \$462,386, and the hourly burden is approximately 19,064 hours. Table 1 displays these combined estimates, as well as the grand total of \$4,806,511 and the hourly burden of approximately 84,402 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 Cost
Respondents	65,338	\$4,344,125
Agency	19,064	\$ 462,386
TOTAL	84,402	\$4,806,511

6.f REASONS FOR CHANGE IN BURDEN

EPA estimates a total average annual respondent reporting burden for this collection of information is 50.26 hours (65,338/1300). This is a reduction from the average annual reporting burden for the previous collection. There is an overall annual reporting burden reduction for this collection of 31,750 hours. Table 2 documents the changes between the 2008 ICR renewal and this renewal. There are several reasons for this change in estimated burden.

The removal of partners reporting directly to EPA and EPA reviewing the test reports has had a significant reduction on the burden associated with direct respondents and agency costs. However, there are new collection activities associated with the third party certification program. While the initial pool of certification bodies and accredited labs is limited, EPA anticipates the number to increase slightly each year of the collection.

In the case of the Partnership Agreement, the number of anticipated responses has changed slightly from 292 in the previous renewal to 100 new Partnership Agreement each year and 1300 recommitments in this renewal. For Partnership Agreements, EPA revised the number of responses based on new specifications being developed requiring new partnerships to be processed as well as an increasing number of revisions to existing specifications which will require new commitments to be processed in response to the revised specification. Plus, the general awareness of the ENERGY STAR brand continues to increase in the number of companies becoming ENERGY STAR partners for existing product categories.

EPA has put significant investment in working with partners to increase their responses to the request for Unit Shipment data. The number of responses for the Unit Shipment Data collection activity increased dramatically from 692 in the previous renewal to 2050 in this renewal. EPA has also added this reporting requirement to all of the 63 product categories, and these two efforts have significantly increased both the respondent's and agency burden.

For Partner of the Year applications, EPA revised the number of responses from 17 in the previous renewal to 140 in this renewal based on the significant increase in award applications received during the past two years. While there has been no significant change in the number of hours per response since the last renewal, with the increase in number of applicants, the static hours per response has yielded a significant increase in total burden.

Table 2 Comparison of Total Annual Hours Under ICR 2078.02 and ICR 2078.03

(1) Information Collections	(2) Annual Hour Burden in 2008 Renewal	(3) Annual Hour Burden in This Renewal	(4) Difference in Hour Burden Between the Previous Renewal and This Renewal			(5) Description of Program Change and/or Adjustment
			Program Change	Adjustment	Total	
Partnership Agreement	1,226.40	02,195.00	0.00	968.60	968.60	EPA adjusted the number of respondents based on improved and updated data and analysis. This ICR estimated 1300 recommitted PA each year, and 5 new product categories with 20 new partners a year. The increased burden estimates in this renewal reflect EPA's program experience gained over the past year.
Qualifying Product Information	18,448.69	-	0.00	(18,448.69)	(18,448.69)	EPA has changed the ENERGY STAR program from a self-certification program to an enhanced qualification process with all partners participating in product specific certification programs. Partners no longer report directly to EPA to qualify their models but instead work with third party certification bodies who will provide EPA, on a regular basis, with a list of certified models that EPA will post on our web site
Testing Reports	63,835.20	-	0.00	(63,835.20)	(63,835.20)	
Application for Recognition	-	291.00	291.00	0	291.00	
Third Party Certified Product Information	0.00	1820.00	1820.00	0	1820.00	
Unit Shipment Data	4,631.46	54,858.00	0	50,226.54	50,226.54	EPA adjusted the number of respondents based on improved and updated data and analysis. EPA has expanded the scope of products required to report on Unit Shipment to all product categories. The burden estimates in this ICR reflect EPA's program experience gained over the past year.
Partner of the Year	1,007.86	6,174.00	0	5,166.14	5,166.14	EPA adjusted the number of respondents based on improved and updated data and analysis. The burden estimates in this ICR reflect EPA's program experience gained over the past year.
Total	89,149. 61	65,338. 00	2,111.00	(25,922. 61)	(23,811. 61)	

6.g BURDEN STATEMENT

The estimated average annual respondent reporting and recordkeeping burden for this collection of information is 83.71 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 12.85 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. For recommitting to the revised specification, the reporting burden for each respondent is estimated to be 0.70 hours

Unit Shipment Data

The reporting burden for information collection requirements associated with unit shipment data for each respondent is estimated to be 26.76 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 44.10 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.

Other burdens not reflected in the partner reporting burden

Application for Recognition

The reporting burden for information collection requirements associated with completing the application for recognition for each respondent is estimated to be 4.85 hours. This estimate includes times for reviewing the instructions on the application, completing and reviewing the information requested by the application, and submitting the recognition application.

Third Party Certified Product Information

The reporting burden for information collection requirements associated with submitting the certified product information for each certification body respondent is estimated to be 20.15 hours. This estimate includes assembling the data into a report format, reviewing it and submitting it.

Burden means the total time, effort, or financial resources expended by persons to generate, maintain, retain, or disclose or provide information to 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. EPA-HQ-OAR-2003-0033, which is available for online viewing at www.regulations.gov, or in person viewing at the Air and Radiation Docket in the EPA Docket Center (EPA/DC), EPA West, Room 3334, 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 at www.regulations.gov. This site can be used 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. When 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. EPA-HQ-OAR-2003-0033 and OMB Control Number in 2060-0528 in any correspondence.

Exhibit 1: Estimated Annual Respondent Burden and Cost
Exhibit 2: Estimated Annual Agency Burden and Cost

Exhibit 1: Estimated Annual Respondent Burden and Cost

	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
Information Collection Activity											
Hourly rate	\$127.70	\$108.79	\$ 75.91	\$43.52							
Partnership Agreement (PA)											
Review the instructions of the PA	1.17	3.58	0.92	0.42	6.09	626.99	0.00	1.65	100.00	609.00	62,864.28
Complete & review the information requested by the PA	0.33	2.75	0.92	0.42	4.42	451.19	0.00	0.74	100.00	442.00	45,193.16
Submit the PA	0.17	1.17	0.08	0.92	2.34	195.10	2.14	0.37	100.00	234.00	19,761.86
Recommit based on specification change	0.10	0.25	0.10	0.25	0.70	58.44	0.00	0.00	1,300.00	910.00	75,970.05
Subtotal	1.77	7.75	2.02	2.01	13.55	1,331.72	Varies	Varies	Varies	2,195.00	203,789.35
Application for Recognition											
Review instructions	0.00	0.25	1.25	1.01	2.51	166.15	0.00	0.74	60.00	150.75	10,013.49
Complete & review application	0.50	0.45	0.81	0.19	1.95	182.64	0.00	3.71	60.00	117.00	11,181.29
Submit the application	0.00	0.14	0.06	0.19	0.39	27.86	0.00	0.37	60.00	23.25	1,694.06
Subtotal	0.50	0.84	2.13	1.39	4.85	376.65	Varies	Varies	Varies	291.00	22,888.84
Supply list of third party certified product information											
CB assemble test data into reporting format	0.00	6.50	13.00	26.00	45.50	2,825.49	0.00	0.00	20.00	910.00	56,509.70
CB submit certified model data for qualification	0.00	6.50	13.00	26.00	45.50	2,825.49	0.00	0.00	20.00	910.00	56,509.70
Subtotal	0.00	13.00	26.00	52.00	91.00	5,650.97	Varies	Varies	Varies	1,820.00	113,019.40
Unit Shipment Data (USD) of ENERGY STAR Products											
Review instructions regarding USD	0.25	0.25	0.25	0.25	1.00	88.98	0.00	0.41	2,050.00	2,050.00	183,254.63
Gather unit shipment data	0.00	0.63	5.75	7.00	13.38	841.59	0.00	6.60	2,050.00	27,429.00	1,738,779.66
Compile & review USD by ENERGY STAR product category	0.25	0.75	5.25	6.00	12.25	773.17	0.00	3.30	2,050.00	25,112.50	1,591,753.25
Submit data	0.00	0.25	0.13	0.75	1.13	69.71	0.00	0.41	2,050.00	2,316.50	143,742.52
Subtotal	0.50	1.88	11.38	14.00	26.76	1,684.46	Varies	Varies	Varies	54,858.00	3,474,275.43
Partner of the Year Application											
Review the eligibility requirements and instructions on application	0.17	1.75	0.17	0.58	2.67	250.24	0.00	0.85	140.00	373.80	35,152.09
Gather data	0.00	7.67	2.67	8.67	19.01	1,414.42	0.00	33.94	140.00	2,661.40	202,770.44
Complete & review the information & narrative descriptions required	0.17	10.83	0.33	3.50	14.83	1,377.28	0.00	26.40	140.00	2,076.20	196,514.50
Submit the application	0.00	1.92	0.17	0.83	2.92	257.90	0.00	3.28	140.00	408.80	36,565.83
Submit original examples of communications materials	0.00	2.92	0.67	1.08	4.67	415.53	0.00	6.97	140.00	653.80	59,149.13
Subtotal	0.34	25.09	4.01	14.66	44.10	3,715.36	Varies	Varies	Varies	6,174.00	530,152.00
TOTAL	3.11	48.56	45.54	84.06	180.26	\$12,759.17	Varies	Varies	Varies	65,338.00	\$ 4,344,125.01

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	\$ -	3	450	\$ 17,537.10
Customize PA for a company	0	0	0.5	0	0.5	\$ 4.46	0	\$ -	1300	650	\$ 31,791.50
Disseminate the PA	0	0	0	0.25	0.25	\$ 4.91	0	\$ 2.07	1300	325	\$ 9,077.25
Review the completed PA	0	0.25	0.25	0	0.5	\$ 28.91	0	\$ -	1300	650	\$ 37,579.75
Enter the information contained in the PA into STAR database	0	0	0	0.5	0.5	\$ 9.83	0	\$ -	1300	650	\$ 12,772.50
Develop and send a Welcome Aboard Pack	0	0	0	0.75	0.75	\$ 14.74	0	\$ 2.07	1300	975	\$ 21,849.75
Subtotal	5	25.25	50.75	71.5	152.5	\$5,928.54	0	Varies	Varies	3700	\$ 130,607.85
Application for Recognition											
Develop Application to be submitted by AB/CB/Labs	0	0.5	1.5	0	2	\$ 106.73	0	\$ -	3	6	\$ 320.18
Disseminate via the Internet	0	0	0.25	0	0.25	\$ 12.23	0	\$ -	3	0.75	\$ 36.68
Review the completed application	0	0	0.25	0	0.25	\$ 12.23	0	\$ -	60	15	\$ 733.65
Enter the information into STAR database	0	0	0	0.25	0.25	\$ 4.91	0	\$ -	60	15	\$ 294.75
Subtotal	0	0.5	2	0.25	2.75	\$ 136.09	0	Varies	Varies	30	\$ 1,385.26
Third Party Certified Product Information											
Compile all certified data into total list per product type	0	0.25	0.25	0	0.5	\$ 0.13	0	\$ -	16380	8190	\$ 2,047.50
Post updated list on webpage	0	0	0.25	0	0.25	\$ 0.06	0	\$ -	1638	409.5	\$ 102.38
Disseminate updated list as requested	0	0	0.25	0	0.25	\$ 0.06	0	\$ -	100	25	\$ 6.25
Subtotal	0	0.25	0.75	0	1	\$ 0.25	0		18118	8625	\$ 2,156.13
Unit Shipment Data for ENERGY STAR Products											
Review unit shipment data	0	0	2	0	2	\$ 97.82	0	\$ -	2050	4100	\$200,531.00
Compile information in aggregate form per product	0	0	2	4	6	\$ 176.42	0	\$ -	63	378	\$ 11,114.46
Evaluate aggregate data to determine program success	0	4	2	0	6	\$ 364.70	0	\$ -	63	378	\$ 22,976.10
Subtotal	0	4	6	4	14	\$	0	Varies	Varies	4856	\$ 234,621.5

						638.94		s			6
Partner of the Year Application											
Develop the award criteria	0	4	10	1.5	15.5	\$ 785.46	0	\$ -	6	93	\$ 4,712.73
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	\$ -	140	1680	\$ 87,155.60
Send a letter of award or loss	0	0	0	0.5	0.5	\$ 9.83	0	\$ 0.41	140	70	\$ 1,432.90
Subtotal	0	6	24	8	38	\$1,731.36	0	Varies	Varies	1853	\$ 93,614.77
TOTAL	5	36	83.5	83.75	208.25	\$8,435.18	0	Varies	Varies	19064	\$462,385.56