

**SUPPORTING STATEMENT FOR
INFORMATION COLLECTION REQUEST:
EPA'S ENERGY STAR® PRODUCT LABELING
EPA ICR NUMBER 2078.06**

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Prepared by:

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Office of Air and Radiation
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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 (Revision).” (EPA ICR No. 2078.06, 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; with the help of ENERGY STAR, Americans prevented more than 300 million metric tons of greenhouse gas emissions in 2014 alone. 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 over 20 years since it was first established, ENERGY STAR has become a very successful program. Today, more than 85% of the American public recognizes the ENERGY STAR label. 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 50,000 certified product models in 70 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.

Within EPA, the program is administered by the Climate Protection Partnerships Division (CPPD). The program currently has unique energy efficiency requirements based on specific test methods for over 70 products including the following:

- office equipment (computers, displays, imaging equipment)
- enterprise equipment (servers, storage, uninterruptable power supplies)
- consumer electronics (TVs, home audio equipment, DVD players, Blu Ray, set-top boxes, cordless and Voice Over IP telephones, small network equipment)
- heating and cooling equipment (boilers, central air conditioners, room air conditioners, air-source heat pumps, geothermal heat pumps, furnaces, ceiling fans, commercial air conditioners, commercial heat pumps, commercial water heaters, ventilating fans)
- lighting (compact fluorescent and solid state lighting, indoor and outdoor residential lighting fixtures, decorative light strings, luminaires)
- home envelope (roof products, windows, doors, skylights)
- residential appliances (clothes dryers, clothes washers, refrigerators, freezers, dishwashers, dehumidifiers, room air cleaners)

- commercial foodservice (fryers, hot food holding cabinets, refrigerators, freezers, steam cookers, ovens, griddles, dishwashers, ice machines)
- water coolers
- vending machines
- pool pumps

Additional products are expected to be added to the program in the future. Existing specifications will also be revised as need to assure that the label remains relevant as a differentiator of efficient products within each category.

EPA partners with retailers and product brand owners who wish to use the ENERGY STAR label to differentiate products as more energy efficient. Retailers and product brand owners sign a Partnership Agreement (PA) with EPA to become a Partner, indicating that they voluntarily agree to fulfill the relevant program requirements referenced in the form. In rare circumstances, EPA partners with brand licensees who sign a joint statement with the brand owner. The program requirements require third party certification for products to be labeled as ENERGY STAR.

Prior to labeling a product as ENERGY STAR, partners must have eligible products tested in an EPA-recognized laboratory and certified by an EPA-recognized third party certification body (CB). To minimize the burden on Partners, EPA maintains an automated data exchange with CBs. The CBs share information with EPA on products they review from EPA-recognized laboratories during the certification process. The XML-based data exchange allows the CBs to automatically transmit information on certified products to EPA from their database via web services. Overall EPA has increased the electronic capability of this process by introducing the automated system, thus reducing the need for paper submissions. EPA runs a series of automated validations to ensure the integrity of the data and confirm the credentials of the organizations associated with the data prior to incorporating it into the ENERGY STAR product database. EPA then provides the relevant information to consumers and purchasers in user-friendly formats that facilitate the purchase of energy efficient products.

The certification process also includes requirements for CBs to report to EPA products that were reviewed, but not eligible for certification, as well as to conduct post-market verification testing of a sampling of ENERGY STAR certified products. CBs are required to complete a minimum amount of verification testing and share information with EPA on products verified twice a year. CBs are also required to promptly report to EPA, any post-market test data indicating a product may no longer meet the program requirements. This process helps maintain consumer confidence in the ENERGY STAR label and protect the investment of Partners.

While most product-related information is provided by CBs, Partners are asked to submit to EPA annual unit shipment data for their ENERGY STAR certified products. EPA is flexible as to the methods Partners may use to 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.

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.

2.b PRACTICAL UTILITY/USERS OF THE DATA

EPA uses collected information 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 EPA's database so the Agency can keep a record of certified products associated with each Partner, and a contact person for important communications. In the occasional situation where EPA partners with brand licensees, EPA enters the information conveyed through the brand owner and licensee joint statement into EPA's database to facilitate Partner communication and also shares this relationship with CBs to facilitate certification of products.

Application to be recognized by EPA

In order to serve as an Accreditation Body (AB), a Laboratory, or a CB, organizations must provide EPA with relevant information as defined for each of these key entities in ENERGY STAR's third party certification program.

Third-Party Certified Product Information

In order for a product to be labeled as ENERGY STAR, the product brand owner must obtain third-party certification of the product's performance. The third-party CB 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 CB provides the model number, along with a range of other identifying and performance information to EPA via an automated XML-based web service so that EPA may authorize use of the logo (in first instance) and include the product on the relevant ENERGY STAR certified 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, and factors into EPA's assessment of whether and how the ENERGY STAR label can continue to effectively differentiate products in the market (see principle number six below.)

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

- assess the feasibility of 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 a range of stakeholders including product manufacturers, utilities, and the efficiency community. 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. As such, the Agency examines factors such as size, speed and delivered output (e.g. lumens for lighting) and establishes performance-based efficiency requirements, where appropriate, to avoid trade-offs that compromise consumer satisfaction.

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, within the life of the product, which is generally between 2 and 5 years.

4. Energy-efficiency can be achieved through one or more technologies such that qualifying products are broadly available and 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 to ensure that energy-efficiency can be achieved through one or more technologies such that qualifying products are broadly available and offered by more than one manufacturer when stabilizing 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 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 generally relies on test procedures developed and maintained by DOE for the ENERGY STAR program.

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

EPA sets and revises specifications so they reflect the performance of products meeting the highest conservation standards. By recognizing the top performers, EPA distinguishes these products from the others, thereby adding to their intrinsic value. 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.

Ineligible Products

In the event that a CB reviews a product for certification and determines that it is ineligible for the program, they are required to report that information to EPA. Then the Agency may compile and share this data with all the recognized CBs. This allows all CBs to have information on potentially ineligible products in the event that the partner seeks certification with a different CB.

Verification Testing

Certification Bodies must select and obtain ENERGY STAR certified products each year, and verify their ongoing performance through verification and challenge testing. EPA uses the verification testing data reported by CBs to monitor product performance after initial certification and take any necessary steps to ensure products continue to meet ENERGY STAR requirements. In the event that a CB tests a product and determines that it no longer meets the ENERGY STAR requirements, the CB reports that information to EPA. Using this data, EPA works directly with partners on a case-specific basis to determine an appropriate resolution.

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 addition those are used to determine whether or not ENERGY STAR specifications need to be revised. For example, if the data show that an overwhelming majority of the market meet the current specification level, 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 nearly 90% response rate from Partners in the collection of Unit Shipment Data (89% in 2012, 90% in 2013, and 88% in 2014). As the submission of this data is an ENERGY STAR Partnership requirement, Partners that do not fulfill the requirement have restrictions placed on their partnership. If after two reporting cycles 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. In the rare event that companies wish to recommit to ENERGY STAR, they must submit shipment data and complete a new Partnership Agreement.

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 other 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 27, 2015 (80 FR 65752). No comments were received on this notice.

3.c CONSULTATIONS

EPA consulted with no more than nine ENERGY STAR Partners regarding the burden of information collection for the program.

In the previous ICRs, the contacted Partners were provided links to copies of the information collection forms (included in the docket), and asked to provide estimates of the associated hourly labor burden. The Partners provided labor hour estimates of each activity. Generally, the estimates provided by the Partners were similar and were consistent with EPA expectations of the labor burden. EPA averaged Partner responses for the labor burden estimates.

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

NAME	ORGANIZATION	PHONE NUMBER	E-MAIL	PRODUCT
Manfred Staebler	Bosch	252-636-4349	manfred.staebler@BSHG.com	Residential Appliances
Anthony Serres	Philips	202-412-6143	anthony.serres@philips.com	Light Fixtures
Jeff Farlow	Pentair	919-566-8054	jeff.farlow@pentair.com	Pool Pumps
Rick Morrison	CSA Group	416-747-4090	rick.morrison@csagroup.org	Testing Lab
David Engel	Bakers Pride Oven Company	972-908-6144	davienge@standexcsg.com	Commercial Food Service Equipment
Dave Winningham	Allied Air	803-738-4085	dave.winningham@alliedair.com	HVAC Equipment
Marty Olson	Kenmore	847-286-1606	martin.olson@kcdbrands.com	Residential Appliances

Randy Abernathy	Advanced Compliance Solutions, Inc.	770-831-8048	rabernathy@acstestlab.com	Testing Lab
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As stated above, ENERGY STAR covers many broad categories of products. EPA selected the above manufacturers to represent a variety product categories, in addition to several testing laboratories, for consultations in preparing this ICR renewal. EPA did not receive any additional information or comment through the Federal Register notice on the burden estimates.

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. When partnering with a brand licensee, a joint statement between the brand owner and licensee is a one-time information submittal; less frequent collection is not possible.

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.

EPA only collects certified product information from CBs to inform the list of ENERGY STAR certified models. The automated collection no longer relies on submission of any forms and is structured to ensure that accurate certification information is relayed to consumers and partners on the ENERGY STAR website.

The reporting of verification testing conducted by CBs occurs twice a year. Less frequent collection would not allow EPA to adequately monitor post-market testing and oversee CB requirements. Information on products that fail verification testing or are determined to not be eligible for the program are required at the time they are identified. Less frequent collection would not allow EPA to maintain proper oversight of the program and maintain consumer confidence in the label.

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

In general, the information collection requirements covered by this ICR adhere to the guidelines stated in the 1995 Paperwork Reduction Act as amended, OMB's implementing regulations.

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.

Partners are not asked to reveal Confidential Business Information (CBI). However, 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

No questions of a sensitive nature are asked in any of the forms or periodic information updates.

4 THE RESPONDENTS AND THE INFORMATION REQUESTED

4.a RESPONDENTS AND SIC CODES

Respondents for this information collection request include ENERGY STAR Partners, who are product manufacturers. The following list of Standard Industrial Classification (SIC) codes includes, but is not limited to industry segments which may be potential 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
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

¹U.S. Department of Labor. *Standard Industrial Classification (SIC) System Search*. Accessed on August 17, 2015 <http://www.osha.gov/pls/imis/sicsearch.html>.

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,
 3585 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,
 3641 electric-mfg
 3645 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
 3661 telephone-mfg
 3663 Cable television equipment-mfg
 Television closed-circuit equipment/Television
 monitors-mfg/Television transmitting antennas and ground equipment-
 3663 mfg
 3679 Power supplies, static, and variable frequency
 Thermostats: air-conditioning, refrigeration, comfort heating,
 3822 appliance-mfg
 3861 Photocopy machines-mfg
 3993 Electrical signs
 4222 Storage, frozen or refrigerated goods
 4939 Utilities, combination of
 5046 Commercial Equipment, Not Elsewhere Classified
 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
 8734 Testing Laboratories

4.b INFORMATION REQUESTED

Information is requested via the ENERGY STAR Partnership Agreement, Brand Licensee Joint Statement, Application for Recognition, Verification Testing Summary, Ineligible Product Form, Unit Shipment Data collection, and Partner of the Year Application.

Partnership Agreement

i. Data Item

- Partner name
- Products 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 Partnership Agreement
- Complete and review information requested by the Partnership Agreement
- Submit the Partnership Agreement

Joint Statement between Brand Owner and Licensee

ii. Data Item

- Partner and Brand Owner name
- Products for which they are partnering with EPA (checklist and commitment form)
- Information on main contact person at each organization
- Signatures of company officials

Recordkeeping Item

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

ii. Respondent Activity

- Review the joint statement template
- Complete and review information required by the template
- Submit as a supplement to the Partnership Agreement if applicable

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
- Organization’s 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
- 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
- Certified laboratories and certification bodies associated with the product.

Recordkeeping Items

The Certification Body is required to maintain a certification record, and test reports on file for all products that undergo certification testing.

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
- Provide notification to the Partner that the product is certified
- Share information on certified products with EPA via XML-based data exchange the relevant product and efficiency data

Verification Testing

i Data Item

- Company Name
- Product Name and model number tested and selected but not tested
- Date of testing completed
- Conclusion of testing – pass or fail

- For failed products, information on nature of the failure, impacted products, and the test report.

Recordkeeping Items

Certification bodies are required to keep test reports on file for all verified products for the duration of the product certification.

ii Respondent Activity

- Select and obtain products for verification testing.
- Have products verified in an EPA-recognized laboratory.
- Determine if the products continue to meet the relevant program requirements.
- Report all products verified to EPA twice a year.
- Report to EPA within two business days of determining a product failure.

Ineligible Products Reporting

i Data Item

- Company Name
- Product Name and model number tested and reviewed for certification
- Reason the product is ineligible

Recordkeeping Items

There are no recordkeeping data items required pertaining to ineligible products reporting.

ii Respondent Activity

- Determine that a product reviewed for certification is ineligible for ENERGY STAR
- Report information to EPA

Unit Shipment Data

i Data Item

- Number of ENERGY STAR certified units shipped that year by product sub-type
- 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

EPA performs activities associated with Partnership Agreements, 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 are conducted by Headquarters staff in EPA’s Climate Protection Partnerships Division, within the Office of Atmospheric Programs.

Partnership Agreement

EPA must perform the following activities related to the Partnership Agreement:

- Customize a Partnership Agreement for each company
- Post the Partnership Agreement templates on the website
- Review the completed Partnership Agreement
- For brand licensees applying for partnership, sent the joint statement template for the brand licensee and brand owner to sign.
- Sign Partnership Agreement
- Enter the information contained in the Partnership Agreement into the Partner database. (Include information from the joint statement template, if applicable.)
- Email 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 Accreditation Bodies, Laboratories, and Certification Bodies using hard copy/electronic forms
- Disseminate applications to interested entities via the ENERGY STAR website
- Process and approve applications for EPA recognition of Accreditation Bodies, Laboratories and Certification Bodies
- Post updated recognized entities on ENERGY STAR website

Third-Party Certified Product Information

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

- Maintain general oversight
- Maintain web services and incorporate model data from CBs into database
- Maintain information on certified products online

Verification Testing

EPA must perform the following activities related to verification testing:

- Oversee ongoing verification testing
- Work with Partners in the event of a product failure

Ineligible Product Information

EPA must perform the following activities related to ineligible products:

- Maintain a current list of ineligible products

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 website
- 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 and validating 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, participating 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. EPA also collects from brand licensees a joint statement with the brand owner prior to signing the Partnership agreement. In order to be recognized by EPA as an ENERGY STAR appropriate Accreditation Body, Laboratory and/or Certification Body, entities must provide EPA with the relevant documentation to provide assurance of their competence to perform these tasks. CBs must provide EPA with a summary of verification testing completed twice a year and report information on ineligible products and products that fail verification testing as they occur. EPA also requires that Product Brand Owner Partners submit information on their unit shipments of ENERGY STAR labeled products annually by March 1st for shipments during the previous calendar year. EPA requests this information the first week of January and reminds partners in February in advance of the annual deadline. 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. The responses EPA received were averaged to estimate the hourly burden for each activity. 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 EPA estimates an average 1.9% increase from the previous ICR submission. Rates reflect a graded scale and include the cost of overhead and fringe benefits where appropriate. The resulting respondent hourly labor rate (hourly plus overhead) of \$130.13 for legal staff, \$110.86 for managerial staff, \$77.35 for technical staff, and \$44.35 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 approximately \$1.00 associated with completing and reviewing the information requested in the Partnership Agreement.

EPA estimates Partners may incur an average amount of approximately \$89 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 2015 GS pay schedule available from the Office of Personnel Management.³ EPA estimates an average hourly labor cost of \$77.92 for legal staff; \$72.86 for managerial staff; \$53.42 for technical staff; and \$21.50 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 one instance of Agency O&M costs associated with ENERGY STAR product labeling information collection activities. This corresponds to the cost of \$0.49 to mail a letter of award or loss to Partners who submit Partner of the Year applications. In the previous ICR, EPA listed disseminating Partnership Agreements and Welcome Aboard Packs as an O&M cost because they were physically mailed to Partners. However, these documents are now available online and/or sent by email; therefore, the Agency no longer associates and O&M cost with those activities.

² U.S. Department of Labor. "National Industry-Specific Occupational Employment and Wages Estimates" Accessed August 17, 2015. http://www.bls.gov/oes/current/naics2_31-33.htm

³ U.S. Office of Personnel Management. *201510 General Schedule (GS) Base*. Accessed on August 17, 2015. https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2015/GS_h.pdf.

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 14,044 hours, at a cost of approximately \$566,573. The three-year, bottom-line burden for the life of this ICR is therefore 42,132 hours and \$1,699,719.

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 280 new Partners will join each year for the three years of this ICR. One joint statement template for brand owners and brand licensees has been developed by EPA for ENERGY STAR product labeling. It is expected that 40 Brand Owner templates will be required to be completed along with the Partnership Agreement each year, for the three years of this ICR

Application for Recognition

The collection activities associated with the third party certification have grown since the introduction of the third party certification process, as such the number of Accreditation Bodies and Certification Bodies has grown. The universe of manufacturer laboratories seeking recognition of in house testing facilities varies depending upon the specific product categories, but EPA estimates that approximately 70 labs will seek EPA recognition.

Third Party Certified Product Information

Product specifications for over seventy different products are developed and maintained by EPA under the ENERGY STAR product labeling program. Each product category has specific qualifying product information that must be reviewed, certified and shared by the certification body. Annually an average of 21,000 products are certified and labeled with the ENERGY STAR. EPA updates the lists of certified models daily to reflect the most current information that has been transmitted to the EPA database via web services.

Verification Testing

CBs conduct verification and challenge testing on an ongoing basis and are required to verify a minimum sampling of products each year. In 2014, twenty CBs were required to submit the summary of the testing they conducted for the year. This number of CBs is representative of how many entities EPA expects to report this information every year. CBs reported 140 product failures to EPA in 2014. This number may decrease in future years as product quality control increases.

Ineligible Products

CBs report to EPA information on products reviewed for certification, but not eligible for ENERGY STAR. Based on the average number of ineligible products reported to EPA in the past three years, EPA expects 40 ineligible products to be reported each year under this ICR.

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 2080 Partners each year for the three-years of this ICR. From these 2080 partners, EPA received approximately 1850 unit shipment reports each year for the three years of this ICR. Unit shipment data will be aggregated for each of the product categories covered by EPA under ENERGY STAR. These estimates are based on aggregates across the 70 product categories.

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 website. An average of 57 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 41,209 hours per year at a cost of approximately \$3,118,166.

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 estimated total cost for respondents is \$3,118,166 and the hourly burden is approximately 41,209 hours. The estimated total cost for the Agency is \$566,573, and the hourly burden is approximately 14,044 hours. Table 1 displays these combined estimates, as well as the grand total of \$3,684,739 and the hourly burden of approximately 55,253 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	41,209	\$3,118,166
Agency	14,044	\$566,573
TOTAL	55,253	\$3,684,739

6.f REASONS FOR CHANGE IN BURDEN

There is a reduction from the annual reporting burden for the previous collection. Table 2 documents the changes between the 2013 ICR renewal and this renewal. There are several reasons for this change in estimated burden.

The removal of partners reporting model data directly to EPA, and EPA reviewing the test reports has reduced on the burden associated with direct respondents and agency costs in the previous ICR. EPA now also has an automated data exchange in place with CBs to share information on certified products to eliminate the need for filling out forms with data on certified products and submitting those forms to EPA. EPA believes much of the burden reduction is as a result of the implementing an automated data exchange with CBs. From consultations, EPA learned that the burden associated with completing the Partnership Agreements and Unit Shipment Data submissions has been reduced.

In the case of the Partnership Agreement, the number of anticipated responses has changed slightly from 100 in the previous renewal to 280 new Partnership Agreements each year and an average of 40 brand owner/licensee agreements. These estimates are based on the average number of Partnership Agreements received over the last three years. As the general awareness of the ENERGY STAR brand continues to grow, the number of companies becoming ENERGY STAR partners for existing product categories also increases.

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 remains relatively constant, at around 2080 Partners. EPA has also added this reporting requirement to all of the 70 product categories, because of the additional products categories EPA estimates a slight increase in respondent's and agency burden.

For Partner of the Year applications, EPA revised the number of responses from 140 in the previous renewal to 57 in this renewal based on the average number of retailers and product brand owner award application received over the last three years. While there has been no significant change in the number of hours per response since the last renewal, with the decrease in number of applicants, the static hours per response has yielded a decrease in total burden.

Table 2: Comparison of Total Annual Respondent Hours Under ICR 2078.05 and ICR 2078.06

Information Collections	Annual Respondent Hour Burden in 2013 Renewal	Annual Respondent Hour Burden in This Renewal	Difference in Hour Burden Between the Previous Renewal and This Renewal			Description of Program Change and/or Adjustment
			Program Change	Adjustment	Total	
Partnership Agreement	2,195	1,721	0	(474)	(474)	EPA adjusted the number of respondents based on improved and updated data and analysis. This ICR estimated 280 new PA each year, and 40 Brand Owner template submissions. The decreased burden estimates in this renewal reflect EPA's program experience, as well as that of Partners to complete this one-time submission.

Application for Recognition	291	474	0	183	183	EPA has changed the ENERGY STAR program. EPA only collects certified product information from CBs to inform the list of ENERGY STAR certified models. The third-party CB must be recognized by EPA and testing must be performed in an EPA-recognized laboratory. The CB provides information about a certified product to EPA via an automated XML-based web service. The automated collection no longer relies on submission of any forms and is structured to ensure that accurate certification information on the ENERGY STAR website.
Third Party Certified Product Information	1820	2,499	679	0	679	
Unit Shipment Data	54,858	32,356	0	(22,502)	(22,502)	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	6,174	4,159	0	(2,015)	(2,015)	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	65,338	41,209	679	(24,808)	(24,129)	

6.g BURDEN STATEMENT

Partnership Agreement

The reporting burden for information collection requirements associated with completing the PA for each respondent is estimated to be 7 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.

Unit Shipment Data

The reporting burden for information collection requirements associated with unit shipment data for each respondent is estimated to be 17 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 73 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.

Application for Recognition

The reporting burden for information collection requirements associated with completing the application for recognition for each respondent is estimated to be 7 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 sharing the certified product information for each certification body respondent has been reduced due to the introduction of a new automated data exchange system. While some CBs may need to modify their systems slightly in response to updated and new program requirements, once they have these modifications in place, the burden of collecting and formatting certification data into the automated system that can be shared with EPA is estimated to be 50 hours. The reporting of submitting the verification testing summary to EPA is estimated to be 21 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 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

Information Collection Activity	Hours and Costs Per Respondent/Qualifying Product								Total Hours and Costs		
	Legal Hours	Manager Hours	Technical Hours	Clerical Hours	Respond Hours/Year	Labor Costs/Year	Ann. Startup Costs	Annual O&M Costs	No of Resp. Activities	Total Hours/Year	Total Cost/Year
Hourly rate	130.13	110.86	77.35	44.35							
Partnership Agreement (PA)											
Review the instructions of the PA	0.54	1.52	0.23	0.10	2.39	\$261	\$0	\$2	280	669	\$73,543
Complete and review the information requested by the PA	0.45	1.31	0.23	0.10	2.09	\$243	\$0	\$1	280	585	\$68,209.71
Submit the PA	0.04	0.67	0.27	0.48	1.46	\$122	\$2	\$0	280	409	\$34,767.04
Submit brand owner letter	0.04	0.67	0.27	0.48	1.46	\$122	\$2	\$0	40	58	\$4,946.16
Subtotal	1.07	4.17	1.00	1.16	7.40	\$747	Varies	Varies	Varies	1,721	\$181,466
Application for Recognition											
Review Instructions	0.0	0.28	0.78	2.00	3.06	\$180	\$0	\$1	70	214	\$12,657
Complete and review application	0.17	0.35	0.67	2.19	3.38	\$210	\$0	\$4	70	237	\$14,951
Submit the application	0	0.08	0.02	0.73	0.83	\$28	\$0	\$0	70	23	\$1,976
Subtotal	0.17	0.71	1.47	4.92	7.27	\$418	Varies	Varies	Varies	474	\$29,584
Supply list of third party certified product information											
CB organize certified model data into format for automated submission	0	0.28	5.10	45.00	50.38	\$2,421	\$0	\$0	20	1,008	\$48,426
Submit summary of verification testing data	0	1.00	2.00	17.50	20.50	\$1,042	\$0	\$0	20	410	\$20,834
Submit testing failure information	0	2.00	4.25	0	6.25	\$550	\$0	\$0	140	875	\$77,064.05
Submit information on ineligible products	0	1.00	4.15	0	5.15	\$432	\$0	\$0	40	206	\$17,274.50
Subtotal	0	4.28	15.50	62.50	82.28	\$4,445	Varies	Varies	Varies	2,499	\$163,598
Unit Shipment Data (USD) of ENERGY STAR Products											
Review instructions regarding USD	0.31	0.68	0.33	0.06	1.38	\$144	\$0	\$0	1,850	2,553	\$267,000
Gather unit shipment data	0	1.40	3.19	2.25	6.84	\$542	\$0	\$7	1,850	12,654	\$1,015,055
Compile and review USD by ENERGY STAR product category	0.06	2.68	2.81	2.25	7.80	\$622	\$0	\$3	1,850	14,430	\$1,156,904
Submit data	0	0.44	0.28	0.75	1.47	\$104	\$0	\$0	1,850	2,720	\$192,606
Subtotal	0.37	5.20	6.61	5.31	17.49	\$1,412	Varies	Varies	Varies	32,356	\$2,364,565
Partner of the Year Application											
Review the eligibility requirements and instructions on application	0.39	3.00	0.72	3.50	7.61	\$594	\$0	\$1	57	434	\$33,920
Gather data	0	18.20	6.50	11.89	36.59	\$3,048	\$0	\$34	57	2,086	\$175,656
Complete and review the information and narrative descriptions required	0.05	20.27	3.77	1.16	25.25	\$2,597	\$0	\$26	57	1,439	\$149,516
Submit the application	0	1.06	0.05	0.27	1.38	\$133	\$0	\$3	57	79	\$7,788
Submit original examples of communications materials	0	1.55	0.22	0.36	2.13	\$205	\$0	\$7	57	121	\$12,072
Subtotal	0.44	44.08	11.26	17.18	72.96	\$6,577	Varies	Varies	Varies	4,159	\$378,953
TOTAL	2.05	58.44	35.84	91.07	105.12	\$13,599	Varies	Varies	Varies	41,209	\$3,118,166

Exhibit 2: Estimated Annual Agency Burden and Cost

Information Collection Activity	Agency Hours and Costs Per Respondent/Qualifying Product								Total Hours and Costs		
	Legal Hours	Managerial Hours	Technical Hours	Clerical Hours	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	\$77.92	\$72.86	\$53.42	\$21.50							
Partnership Agreement (PA)											
Modify and update PA	0.0	0.0	0.50	0.0	0.50	\$26.71	\$0.00	\$0.00	1,500	750	\$40,065
Post the PA templates on the website	0.0	0.0	0.0	0.25	0.25	\$5.38	\$0.00	\$0.00	1,500	375	\$8,063
Review the completed PA	0.0	0.25	0.50	0.50	1.25	\$55.68	\$0.00	\$0.00	1,500	1,875	\$83,513
Enter the information contained in the PA into EPA database	0.0	0.0	0.0	0.50	0.50	\$10.75	\$0.00	\$0.00	1,500	750	\$16,125
Send email with a Welcome Aboard Pack	0.0	0.0	0.0	0.25	0.25	\$5.38	\$0.00	\$0.00	280	70	\$1,505
Subtotal	0.0	0.25	1.00	1.50	2.75	\$103.89	\$0.00	Varies	Varies	3,820	\$149,270
Application for Recognition											
Modify application to be submitted by AB/CB/Labs	0.0	0.25	0.50	1.00	1.75	\$66.43	\$0.00	\$0.00	70	123	\$4,650
Disseminate via the Internet	0.0	0.0	0.25	0.0	0.25	\$13.36	\$0.00	\$0.00	3	1	\$40
Review the completed application	0.0	0.0	0.25	0.0	0.25	\$13.36	\$0.00	\$0.00	70	18	\$935
Enter the information into EPA database	0.0	0.0	0.0	0.25	0.25	\$5.38	\$0.00	\$0.00	70	18	\$376
Subtotal	0.0	0.25	1.00	1.25	2.50	\$98.51	\$0.00	Varies	Varies	158	\$6,001
Third Party Certified Product Information											
Maintain web services and incorporate model data from CBs into database	0.0	1.00	15.00	2.00	18.00	\$917.16	\$0.00	\$0.00	12	216	\$11,006
Review and ensure accuracy of testing failure information	0.0	0.50	1.50	1.00	3.00	\$138.06	\$0.00	\$0.00	140	420	\$19,328
Review and ensure accuracy of verification testing	0.0	0.50	6.00	2.00	8.50	\$399.95	\$0.00	\$0.00	40	340	\$15,998
Review and ensure accuracy of verification testing summary report	0.0	1.00	6.50	2.50	10.00	\$473.84	\$0.00	\$0.00	2	20	\$948
Maintain ineligible products list	0.0	0.50	2.00	3.00	5.50	\$207.77	\$0.00	\$0.00	4	22	\$831
Subtotal	0.0	3.50	31.00	10.50	45.00	\$2,136.78	\$0.00	Varies	Varies	1,018	\$48,111
Unit Shipment Data for ENERGY STAR Products											
Review unit shipment data	0.0	0.0	2.0	2.0	4.0	\$149.84	\$0.00	\$0.00	1,850	7,400	\$277,204
Compile information in aggregate form per product	0.0	0.0	2.0	4.0	6.0	\$192.84	\$0.00	\$0.00	70	420	\$13,499
Evaluate aggregate data to determine program success	0.0	4.0	2.0	0.0	6.0	\$398.28	\$0.00	\$0.00	70	420	\$27,880
Subtotal	0.0	4.0	6.0	6.0	16.0	\$740.96	\$0.00	Varies	Varies	8,240	\$318,582
Partner of the Year Application											
Update the award criteria	0.0	4.0	10.0	1.5	15.5	\$857.89	\$0.00	\$0.00	6	93	\$5,147
Post application on the website	0.0	0.0	0.5	2.0	2.5	\$69.71	\$0.00	\$0.00	1	3	\$70
Review submitted awards application	0.0	2.0	10.0	0.0	12.0	\$679.92	\$0.00	\$0.00	57	684	\$38,755
Send a letter of award or loss	0.0	0.0	0.0	0.5	0.5	\$10.75	\$0.00	\$0.41	57	29	\$636
Subtotal	0.0	6.0	20.5	4.0	30.5	\$1,618.27	\$0.00	Varies	Varies	808	\$44,609
TOTAL	0.0	14.0	59.5	23.3	96.8	\$4,698.41	\$0	Varies	Varies	14,044	\$566,573