



March 20, 2025

The Honorable Craig Goldman
U.S. House of Representatives
1716 Longworth House Office Building
Washington, D.C. 20515

Dear Representative Goldman:

I am writing to you on behalf of the National Automatic Merchandising Association (NAMA), the leading trade association representing the convenience services industry, in support of H. J. Res. 75. NAMA appreciates your leadership on this important matter.

Founded in 1936, NAMA is the association representing the \$34.9 billion U.S. convenience services industry. With nearly 1,000 member companies — including many of the world’s most recognized brands — NAMA provides advocacy, education, and research for its membership. Through traditional vending and micro markets, office coffee and pantry services, product manufacturing, and small-drop distribution, convenience services meet the needs of over 40 million American consumers daily at work, home, school, and play.

The convenience services industry contributes [significantly to our nation’s economy](#), employing more than 160,000 individuals, contributing \$3.5 billion in taxes and paying \$10.4 billion in wages annually. Most of the operators in the convenience services industry are small businesses—an estimated 90+ percent of operators have less than \$10 million in revenue per year.

NAMA has been actively engaged in the Department of Energy’s (DOE) rulemaking process on commercial refrigeration equipment (CRE). Throughout this process, NAMA has provided critical input on the proposed efficiency standards and their potential impact—not only on CRE manufacturers but also on the operators nationwide who rely on this equipment every day.

To date, NAMA has highlighted flaws and errors in the assumptions and methodology employed by DOE. These include overstating the energy savings, relying on unproven or untried efficiency improvements, and underestimating the cost of new machine components. Simply put, the costs are underappreciated, and the benefits are overhyped—a miscalculation hurting consumers and manufacturers. Unfortunately, DOE failed to adequately address these issues in the final rule.

Further, President Trump’s January 20, 2025, Executive Order, *Regulatory Freeze Pending Review*, explicitly directed federal agencies to withdraw any rules that had been sent to the Office of the Federal Register but had not yet been published by noon on January 20. Despite this clear directive, DOE proceeded with the publication of the final rule, *Energy Conservation Standards for Commercial Refrigerators, Freezers, and Refrigerator-Freezers*, in the *Federal Register* on January 21, 2025.

By moving forward with publication in direct contradiction of the Executive Order, DOE has triggered the compliance clock for NAMA's CRE manufacturer members. While the Department has exercised its authority to temporarily delay the rule's effective date, this action falls short of addressing the rule's fundamental flaws.

We appreciate Congress utilizing the Congressional Review Act (CRA) to disapprove this rule. By invoking this authority, Congress will enable NAMA and other affected stakeholders to re-engage with the Department on efficiency standards that better align with manufacturing realities and protect both industry and consumers.

NAMA supports H. J. Res. 75 and encourages Congress to adopt this legislation. Thank you again for your leadership on this issue.

Sincerely,



Matt Bisenius
Vice President, External Affairs