



April 6, 2011

Ms. Ann Bailey  
Director, ENERGY STAR Product Labeling  
Office of Air and Radiation  
United States Environmental Protection Agency  
1200 Pennsylvania Ave., N.W.  
Washington, D.C. 20460  
Via e-mail: [mostefficient@energystar.gov](mailto:mostefficient@energystar.gov)

**Re: Proposed Recognition Criteria for Top Tier Program**

Dear Ms. Bailey:

Thank you for the opportunity to comment on the Environmental Protection Agency's (EPA's) proposed recognition criteria for the Top Tier program. As a long-time ENERGY STAR Partner, Samsung welcomes the new initiative by the EPA to recognize even more highly energy efficient products in the market. Moreover, we are particularly delighted and honored to have been selected as an ENERGY STAR Partner of the Year, and we hope to maintain and expand the productive relationship we have with the EPA.

In line with the EPA's goals, Samsung's intention is to continue to manufacture energy efficient products, and we plan to do our best to stay in the forefront of this initiative. As always, our foremost goal is to deliver maximum value and quality to our customers.

Set forth below are our comments regarding the proposed recognition criteria. Our comments at this time are limited to clothes washers and refrigerators.

**I. Proposed Criteria for Clothes Washers**

The proposed recognition requirement for clothes washers is a modified energy factor (MEF) of 3.0 or higher and a water factor (WF) of less than or equal to 3.0. Although we do not have specific comments on the proposed criteria, we believe that it may be useful to refer to the guidelines provided by the Consortium for Energy Efficiency, particularly as they relate to Tier 3 products. This will help ensure that the EPA's initiative dovetails with existing programs that are designed to increase energy efficiency.

In addition to the above standards, we would like to suggest that the estimated annual electricity use amount be included as part of the recognition criteria, as this figure serves as an important guide to consumers. While MEF and WF are both important factors to consider when determining efficiency, not all consumers may be familiar with these concepts. Moreover, even though MEF and WF are not part of the Energy Guide labels, which consumers rely upon when making appliance purchases, the estimated annual energy consumption level and estimated annual operating cost are clearly marked on these labels. In this regard, we suggest that the EPA also include annual electricity use as part of the recognition criteria for clothes washers, and we propose that the requisite amount be equal to

or less than 100 kWh/year for this product category. Such a standard should help ensure that the EPA's goal of reducing overall energy consumption is achieved.

## **II. Proposed Criteria for Refrigerators**

The EPA's proposed recognition criterion for refrigerators is that the product must use less than or equal to 403 kWh/year and be at least 30% more efficient than current federal requirements. Samsung welcomes this proposal and does not have specific comments on the proposed standard.<sup>1</sup>

In conclusion, Samsung welcomes the EPA's proposals, and we applaud the robust approach taken by the EPA in the proposed recognition criteria. Samsung is firmly committed to working with the EPA to make the Top Tier program successful.

Thank you again for the opportunity to provide comments, and we look forward to working with you on this very important project.

Sincerely yours,



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<sup>1</sup> We would like to note that based on our estimates, the proposed refrigerator criteria would mainly recognize smaller sized refrigerators. Our estimate is that the average volume of a qualifying product would be approximately 18 cubic feet. In this regard, EPA may want to consider expanding the criteria to include larger sized refrigerator models, since based on data provided by The NPD Group, our understanding is that approximately 56% of American households use refrigerators that are 20 or more cubic feet. This will help assure that users of larger sized appliances will also be able to benefit from the Top Tier program.