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J.B. HOYT
DIRECTOR, GOVERNMENT RELATIONS

January 23, 2008

Mr. Richard Karney
ENERGY STAR® Products Manager
U.S. Department of Energy
Building Technologies Program
1000 Independence Avenue, SW
Washington, DC 20585-0121

Re: Proposed 2009, 2011 ENERGY STAR Criteria for Clothes Washers

Dear Rich:

Whirlpool Corporation is generally supportive of the two-step proposal for changes in the ENERGY STAR qualification levels for clothes washers as outlined in your letter of January 9, 2008. Specifically:

- The two-step process allows greater time for manufacturers to develop qualifying product, particularly the longer lead-time for the very significant increase in 2011
- The two-step approach also provides greater certainty for product planning and development

We continue to be concerned about the quality of the data which the Department of Energy utilizes in developing proposals such as this. As noted in your analysis, the number of models offered bears no correlation to the volume of sales of those models. As such, we believe that your analysis reflects the trends in this product, but not the absolute levels of ENERGY STAR product volumes.

Thank you for the opportunity to comment on this process.

Sincerely,

A handwritten signature in black ink, appearing to read "J.B. Hoyt". The signature is written in a cursive, flowing style.