

REF No.	Topic	Comment	EPA Response
1	Definitions	Stakeholder supports the harmonization of the ENERGY STAR definitions for Modified Energy Factor and Water Factor with the DOE definitions.	EPA maintained the harmonized definitions in the final specification.
2	Effective date	The proposed effective date of January 8, 2013 is supported.	In the Final Version 6.0 specification, EPA has modified the effective date to February 1, 2013 to maintain the 9 month transition period.
3	Definitions	EPA's proposal to revise the basic model definition to harmonize with the recently revised DOE definition is supported. The definition provided in the Final Draft was not exactly the same as the DOE definition and should read: "All units of a given type of covered product (or class thereof) manufactured by one manufacturer and with respect to clothes washers, which have the same primary energy source, which have electrical characteristics that are essentially identical, and which do not have any differing physical or functional characteristics that affect energy consumption."	The definition language for basic model has been amended to match the DOE definition.
4	Cleaning Performance	AHAM is willing to work with EPA if it considers an increased stringency in levels during a future revision of Version 6.0 to consider including cleaning and rinse performance for commercial clothes washers.	EPA appreciates industry stakeholders' interest in working with the program to consider cleaning and rinse performance as part of a future specification revision.
5	Model Numbers	The model number language revision is supported.	EPA appreciates the comment and support for the updated model number language.
6	Testing Requirements	EPA's decision to reference DOE's sampling procedures for the purposes of qualification testing is strongly supported. Allowing manufacturers to leverage testing performed for determining compliance with minimum efficiency standards is consistent with following the DOE test procedure requirements and is the most efficient and accurate approach.	EPA appreciates the comment and support for the updated sampling procedures.
7	Definitions	The proposal to eliminate upper capacity limits in the commercial clothes washer definition is not supported. EPA is strongly encouraged to ensure that this definition is consistent with DOE regulations. This stakeholder states that EPA must have substantial reasons for varying from DOE definitions and that allowing products that are larger than the DOE capacity limits to qualify does not rise to this level.	In the Final Version 6.0 specification, EPA harmonized with the DOE definition but excluded the maximum capacity requirements. The current DOE clothes washer test procedure allows larger capacity clothes washers (up to 3.8 cubic feet), to be tested. DOE has also proposed changes to the test procedure that would permit testing washers as large as 6.0 cubic feet. Since larger commercial washers can offer provide both high efficiency and the opportunity for end-users to run larger and thus fewer loads, EPA does not feel it is appropriate to exclude larger products from the program. Note: this ENERGY STAR definition does not have any impact on compliance with DOE standards for commercial clothes washers.