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November 10, 2010

Amanda Stevens
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program
1200 Pennsylvania Ave., MC 6202J
Washington, DC 20460

Re: Draft 1 Version 5.0 ENERGY STAR Product Specification for Residential Dishwasher

Dear Ms. Stevens:

On behalf of Samsung, I would like to submit the following comments on the Draft 1 Version 5.0 ENERGY STAR Product Specification for Residential Dishwashers.

Cleaning Performance Requirements

Samsung does not have a recommendation for a cleaning performance test method at this time. This is due to the fact that Samsung has not been able to locate an accurate, repeatable cleaning performance test procedure.

EPA should not allow more than one cleaning performance test. Cleaning performance measurements must produce consistent and comparable results—a challenge that multiple cleaning performance test may not ever overcome.

EPA asked if data is available showing that certain test scores accurately predict consumer satisfaction with product cleaning performance. Samsung believes that additional, formalized studies need to be performed to evaluate customer satisfaction with product cleaning performance. Customer satisfaction data, if any currently exists, would be limited and/or inconsistent.

Energy and Water Consumption Requirements

Samsung supports EPA in its efforts to update the ENERGY STAR Dishwasher specification to achieve its intended target of the top 25% of products in the market, and believes that more-stringent energy and water consumption requirements are needed to maintain that target. EPA estimated that 81% of models are currently ENERGY STAR qualified, but the proposed limits of 4.0 gallons/cycle and 280 kWh/year for standard dishwashers would reflect only 10% of products on the market, which is well below the intended target of 25%.

EPA recognized in the ENERGY STAR Draft 1 v5.0 Dishwashers Specification that as energy and water efficiency standards become more stringent, dishwasher cleaning performance could suffer. Samsung

agrees. Therefore, Samsung suggests that until an accurate, repeatable cleaning performance test procedure is developed and evaluated against different efficiency levels to ensure that cleaning performance does not suffer for a given energy and water consumption limit, EPA adopt a slightly less stringent energy and water consumption requirement.

EPA estimates that the CEE Tier 2 requirement of 4.25 gallons/cycle and 295 kWh/year reflects 16% of products on the market. Although 16% is still far from EPA's intended target of 25%, Samsung believes that it is more achievable in a one year timeframe for many more brands than the proposed limits where only 10 brands currently qualify. Considering issues of qualifiability for many brands, inadequate test methods, and cleanability for too stringent energy and water consumption limits, Samsung suggests EPA adopt the CEE Tier 2 limits of 4.25 gallons/cycle and 295 kWh/year, without cleaning performance requirements, to be effective Fall 2011. EPA still reserves the option to consider cleaning performance and energy and water consumption limits revision in the future when adequate test methods and cleanability comparisons are available.

Smart Grid

Samsung supports the AHAM/Advocate proposal for a 5% credit, in concept, for smart grid enabled appliances, but believes that it is premature for EPA to consider the credit at this time. Smart grid technologies, while many are in final stages, are still in infancy stages when it comes to deployment and adoption. Until a broad deployment, consistent adoption, and solid savings of smart grid is realized, EPA should delay allowances for smart grid credits.

Samsung appreciates the opportunity to comment on the Draft 1 Version 5.0 ENERGY STAR Product Specification for Residential Dishwashers. Should you have any questions, please feel free to contact me at 310-900-5245 or via email at mikem@sea.samsung.com.

Sincerely,

Michael Moss 

Michael Moss
Director of Corporate Environmental Affairs