



2000 M 63 · Mail Drop 3005 · Benton Harbor, Michigan 49022 · Phone: 269/923-4647 · Fax: 269/923-4652

J.B. HOYT
DIRECTOR, GOVERNMENT RELATIONS

January 17, 2006

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

Re: Dishwasher 2007 Qualifying Levels

Dear Mr. Karney:

Thank you for the opportunity to submit follow-up subsequent to your letter of December 20, 2005.

In summary, Whirlpool:

- Supports the proposed ENERGY STAR Energy Factor (EF) levels of .65 for Standard Dishwashers and .88 for Compact Dishwashers
- Believes that eventual inclusion of standby power is appropriate; however, we take no issue with not including it in the 2007 qualifying levels
- Does not believe that water consumption should be included as a criterion since (a) water use in Dishwashers is a very small portion of national water use and (b) water consumption in Dishwashers is highly correlated with the already-regulated energy use
- Does not feel that product performance should be part of the ENERGY STAR program for dishwashers or any other household appliance

Additionally, we appreciate the opportunity to participate in the proposed dishwasher working group and will provide specifics under separate cover.

Whirlpool's one major concern is that manufacturers be allowed to have sufficient lead-time from the issuance of the final qualification levels to the effective implementation date in order to fully comply with the new levels. The Department states that it is confident manufacturers will have qualifying models available by the proposed January 1, 2007 effective date. Our concern is that the delay in finalizing the 2007 qualifying level will adversely impact our ability to adequately test these new models and assure complete consumer satisfaction with their performance. Consequently, we would ask that the Department consider a day-for-day delay in the effective date for the new levels. That is, the effective date should be 12 months from the date the final notice of the qualifying levels is released.

Whirlpool Corporation looks forward to continued dialog with the Department on this matter. Please contact the undersigned should you have any questions regarding these comments.

Sincerely,

A handwritten signature in cursive script, appearing to read "J. B. Hoyt".

cc: Bill McNary, D&R International