

June 21, 2007

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

Dear Mr. Karney,

On behalf of LG Electronics, thank you for the opportunity to comment on the proposed changes to the Energy Star criteria for the refrigerators. We respectfully request that the Energy Star level change for refrigerators (to better than the current standard by 20%) have an implementation date of January 1, 2009 or later.

LG Electronics is a growing player in the U.S. appliance market with a high percentage of our products meeting or exceeding the current Energy Star levels. LG Electronics is committed to developing and producing energy efficient products. While we support the new proposed Energy Star level, sufficient timing is needed to meet this new level.

As in any change, product development, evaluation testing, production ordering, production start-up and shipping all require time. The proposed date of April 1, 2008 would be difficult if not impossible for manufacturers to meet the Energy Star criteria change. Taking into account the delivery period to retailers of approximately two months, the products implementing the change would need to be manufactured by the beginning of January 2008, which unfortunately is too short of a time to comply.

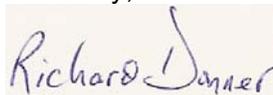
Hence, establishing the effective date as January 1, 2009 at its earliest would be most appropriate and efficient for the manufacturers to be able to bring products at the higher energy efficiency level to the market.

Finally, we have concerns about the proposed Test Criteria. Simply put, applying the criteria as proposed would be contrary to the applicable DOE test procedure. It would impose some conditions that are fundamentally different from those in the current test procedure -- conditions that are difficult to comply with and furthermore would discriminate against beneficial features. The proposed criteria are a minefield of problems. Applying these proposed criteria would also create confusion and doubt in the process, which is counter to the goals of the Energy Star program.

We at LG Electronics wholeheartedly support Energy Star and recognize the consumer benefits of this voluntary program. Please let us know if you have any questions or if we can assist further regarding the test criteria.

Again, we thank you for the opportunity to comment on the proposed change.

Sincerely,



Richard Donner
Director of Digital Appliance Standards and Regulatory Compliance
LG Electronics Inc, USA