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March 4, 2011

Via email

Amanda Stevens  
U.S. Environmental Protection Agency  
ENERGY STAR Appliance Program  
appliances@energystar.gov

Re: **Draft 2-Version 5.0 ENERGY STAR® Product Specifications for Residential Dishwashers**

Dear Ms. Stevens,

We appreciate the opportunity, through the collaborative effort that has been shared between the EPA and stakeholders, to comment on the draft specification that was put forth by the EPA on February 2, 2011.

As a very active member of the Association of Home Appliance Manufacturers (AHAM), we have worked closely with them in the development of the comments they have submitted (under separate cover) regarding this matter. **Please be advised that we support and echo the positions taken by AHAM with the exception that we support confidential reporting of a cleaning index score beginning in 2012.** Additionally, we would like to emphasize the importance of the right performance metric coinciding with efficiency levels that exceed what is outlined in V4.0.

Performance Metric

As we indicated in our previous comments, Whirlpool feels that the AHAM DW-1 test is by far the most representative of American consumer behaviors in terms of relevant food soil types, soil amounts and cleaning practices. However, additional study and full-scale round robin testing will be required to validate repeatability and reproducibility along with determining an acceptable test score threshold. AHAM has stated that with the support of the appliance industry, they are committed to having the necessary revisions of AHAM DW-1-2009 complete by 2013 and they continue to work toward that goal. Moreover, it is imperative that any efficiency level that exceeds V4.0 must have a performance metric. Implementing unprecedented energy and water ENERGY STAR levels without a cleaning score will drive compensating behavior by the consumer, negating any efficiency and monetary benefits the consumer was expecting. If a model uses extremely low levels of water and energy, but does not clean dishes to a consumer's satisfaction, they will respond by pre-rinsing dishes and running more water and energy intensive cycles. Also, without a performance test, some manufacturers will accelerate this consumer behavior by gaming and proliferating dishwashers that do not clean dishes in the name of meeting the new levels.

## Reporting Requirement

Regarding the cleaning score index reporting requirement proposed by the EPA under Tier 1, Whirlpool Corporation would support this initiative as long as it is done through AHAM and there is further clarification on test procedure details not outlined in the DW-1 test procedure, such as position of the upper and lower dishwasher rack, loading pattern, etc. The latter would ensure greater consistency across all manufacturers while submitting the data through AHAM would keep the data anonymous because of the 3 participant minimum requirement. We would also entertain alternative reporting methods, which would assure these 2012 scores remain confidential.

Whirlpool Corporation appreciates the opportunity to submit these comments on ENERGY STAR's proposal regarding Advancing ENERGY STAR Program Requirements Product Specification for Residential Dishwashers, Eligibility Criteria, Draft 2, Version 5.0.

Sincerely,

A handwritten signature in dark ink, reading "Nick Gillespie". The signature is fluid and cursive, with the first name "Nick" being more prominent and the last name "Gillespie" following in a similar style.

Nick Gillespie  
Government Relations Senior Specialist