



OFFICIAL PARTNER OF THE NBA

January 26, 2011

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

Re: ENERGY STAR Program Requirements Product Specification
For Room Air Conditioners, Eligibility Criteria, Draft 1, Version 3.0

Dear Ms. Stevens:

Haier America is an industry leader in supplying Room Air Conditioner products in both the U.S and Canadian markets. We would like to submit here our comments on the ENERGY STAR Program Requirements Product Specification for Room Air Conditioners, Eligibility Criteria, Draft 1, Version 3.0.

ENERGY STAR has a special importance for Haier. One of our objectives is being “Green,” and ENERGY STAR qualification plays an important role in meeting this objective. In addition, Haier has been a strong supporter of DOE/EPA energy and environmental programs. We urge EPA to revise the proposed effective date of the proposed specification changes to October 2012 in order to better account for industry-wide room air conditioner production timeline.

EPA has indicated that under its anticipated schedule for the Room Air Conditioner specification revision, a final version would be published sometime in May 2011, to be effective nine months later, in approximately February 2012. Haier strongly opposes this effective date as it does not take into account production timelines for this product category. Room Air Conditioners generally have longer production timelines than most other products available on the market due to the seasonal nature of this category. Basically, manufacturers complete plans for the next season’s products earlier than plans are completed for other product categories. In order to meet the new proposed levels by February 2012, manufacturers would need to be planning for those products now; however product planning for a new specification level cannot begin until the product specifications have been finalized. In order to adequately account for manufacturers Room Air Conditioner production timelines, Haier America suggests that the revised specification’s effective date be changed to October 2012. This date will allow manufacturers ample time to plan products that meet the revised requirements.

In addition to the above, there is also the issue of carry-over inventory from the 2011 cooling season. As you may already know, Room Air Conditioners are a seasonal product with a carry over of about 20% or about 1.8 million units from one season to the next. For those carry over units which are built under the current ENERGY STAR specs, they would no longer qualify when the new specifications take place in February 2012. We feel that EPA should set clear guidelines on how to handle such a high quantity of products that would no longer qualify for ENERGY STAR as this will have a major impact on manufacturers, retailers and ultimately consumers.

We would suggest that EPA allow industry to continue selling those carry over items as ENERGY STAR qualified for a period of 12 months after the effective date.

Best Regards,

A handwritten signature in black ink, appearing to read "Angelo Cacciatore". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Angelo Cacciatore
Compliance Engineer