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Nick Gillespie
Government Relations

August 23, 2010

U.S. Environmental Protection Agency
ATTN: Kristen Taddonio
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: **Notice on Combination (all-in-one) Clothes Washers**

Dear Ms. Taddonio:

Whirlpool Corporation values the opportunity to comment on the two potential test procedures for "all-in-one" clothes washer-dryers proposed in your letter to ENERGY STAR® stakeholders on August 17, 2010. Our ongoing commitment to the growth, success and integrity of the ENERGY STAR promise continues to be a strong source of pride for Whirlpool Corporation as a leader in designing, producing and marketing ENERGY STAR qualified appliances that reduce water and energy usage, save consumers money on utilities and reduce greenhouse gas emissions through superior energy efficiency.

While we applaud the initiative taken by the EPA to explore a new possibility for the ENERGY STAR program, we do not believe this is a good precedent to set seeing that DOE has owned the test procedure process and this is a category without an existing DOE test procedure. Moreover, given the very low volume of this category and the limited ENERGY STAR resources, we would rather collaborate with the EPA on other efforts such as an ENERGY STAR rating for dryers and/or cooking products where there is an existing body work on test procedures.

Should the EPA choose to move forward, we feel that the test procedure working group needs to go further with their analysis on evidence of consumer behavior since some of their points listed in the pros and cons of methods A and B are based on unsupported assumptions regarding average consumer usage of this product type. If the preferable test procedure is to be the one that best represents consumer usage with accurate, fair, and consistent results, it is imperative that ENERGY STAR thoroughly understand consumer use habits of all-in-one units before further consideration is given to the adoption of either test method.

This is especially important for evaluating method B since it would not only be a significant departure from the existing and well understood DOE test procedures in method A, but it would add a layer of complexity that could cause confusion for consumers by having multiple test procedures for measuring energy consumption. Because method A would allow for the use of existing DOE test procedures, consumers can more easily compare efficiency between all-in-one washer-dryers and separate clothes washers and clothes dryers. Coupled with the fact these existing DOE test procedures are the ones used in the calculations of the data provided for FTC Energy Guide labels, the most consumer centric approach needs be mindful of the value in keeping the procedures as consistent as possible when deciding on a method.

Again, we appreciate the chance to provide input to the EPA process and look forward to continued collaboration and communication on the ENERGY STAR program.

Sincerely,

A handwritten signature in purple ink that reads "Nick Gillespie".

Nick Gillespie
Government Relations Senior Specialist