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October 13, 2016

Via E-Mail

Ann Bailey, Director
ENERGY STAR Product Labeling
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program

Most Efficient@energystar.gov

Re: ENERGY STAR Proposed Recognition Criteria for Most Efficient 2017, Clothes Dryers

Dear Ms. Bailey:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the Environmental Protection Agency's (EPA) proposed recognition criteria for ENERGY STAR Most Efficient 2017 clothes dryers.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM appreciates that EPA declined to adopt its original proposal to set Most Efficient 2017 clothes dryer criteria for both the normal cycle and the "most energy consuming cycle." As we commented on September 6, that proposal would have been incredibly burdensome for manufacturers with no demonstrable benefit to consumers. AHAM remains concerned, however, with EPA's second proposal for clothes dryers which would set Most Efficient 2017 criteria for clothes dryers for both the normal cycle and the normal cycle, highest dryness level.

AHAM reiterates the concerns raised in our September 6 comments regarding EPA's proposed criteria for clothes dryers that are not consistent with EPA's approach in the underlying

specification and/or with the Federal energy conservation standards which are the foundation of the ENERGY STAR program for appliances. Specifically, as we mentioned in those comments, both EPA and DOE require testing of only the normal cycle for the energy conservation standards and the ENERGY STAR specification. As we mentioned in our previous comments, by not measuring the “best of the best” against the same basic criteria as “the best,” EPA sends mixed messages to consumers.

Aside from that matter of principle, however, AHAM opposes the proposed requirement on the normal cycle, highest dryness level. Similar to our comments on September 6, this proposal will still add a significant amount of burden on manufacturers who will have to run additional testing to satisfy this requirement. That could be a deterrent to qualifying products as Most Efficient.

And, there is no corresponding benefit to requiring such a burden. The DOE test procedure already contemplates that, if the ending moisture level is above a certain level, consumers may select the highest dryness level setting and potentially use more energy. Thus, the test requires that, once the dryer terminates using the automatic termination controls, the ending remaining moisture content be measured. If it is 2% or less, the test ends. If it is over 2%, then the test requires testing on the highest dryness level setting and that energy is used as the test value. Thus, manufacturers are, in essence, penalized for automatic termination controls that do not work well and stop the cycle before the 2% threshold is reached. That level was selected because it was consistent with dryers that were on the market prior to the test going into effect. Accordingly, the test procedure already achieves EPA’s goal of protecting consumer expectations and EPA need not impose additional burden on manufacturers to test another cycle.

AHAM appreciates the opportunity to submit comments on EPA’s proposed recognition criteria for ENERGY STAR Most Efficient 2017 clothes dryers and would be glad to further discuss these matters should you so request.

Best Regards,

A handwritten signature in black ink, reading "Jennifer Cleary". The signature is written in a cursive, flowing style.

Jennifer Cleary
Director, Regulatory Affairs