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July 15, 2019

Via E-Mail

Katharine Kaplan
U.S. Environmental Protection Agency

roomaircleaners@energystar.gov

Re: ENERGY STAR Draft Version 2.0 Room Air Cleaners Connected Criteria

Dear Ms. Kaplan:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the ENERGY STAR Draft Version 2.0 Room Air Cleaners Connected Criteria.

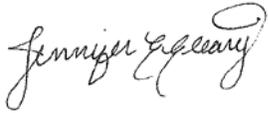
AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped 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 expects its members may file individual comments regarding whether or not connected criteria are needed or appropriate in the ENERGY STAR criteria. AHAM's comments are restricted to the substance of those criteria should they be included. AHAM does not oppose the substance of the criteria as presented in this latest draft. It appears to be relatively consistent with connected criteria in other ENERGY STAR specifications. We also appreciate the "reasonable time after sale" language with respect to hardware, as AHAM has made this request in the past.

We urge EPA to ensure the requirement for the consensus protocol for purposes of interoperability allows for use of an effective standard and does not impose a costly requirement on manufacturers.

I would be happy to discuss the specification further should the need arise.

Sincerely,

A handwritten signature in cursive script that reads "Jennifer Cleary".

Jennifer Cleary
Vice President, Regulatory Affairs

