January 10, 2019

Via E-Mail

Abigail Daken
Manager
ENERGY STAR HVAC Program
U.S. Environmental Protection Agency

Dehumidifiers@energystar.gov

Re: ENERGY STAR Program Requirements; Product Specification for Dehumidifiers, Eligibility Criteria, Final Draft, Version 5.0

Dear Ms. Daken:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the ENERGY STAR Product Specification for Dehumidifiers, Eligibility Criteria, Final Draft, Version 5.0.

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 supports EPA and the Department of Energy (DOE) in their efforts to provide incentives to manufacturers, retailers, and consumers for energy efficiency improvement, as long as product performance can be maintained for the consumer. Although we would prefer a slightly later effective date of October 31, 2019, AHAM appreciates that the final draft continues to include an effective date in October 2019 in order to remain consistent with product design and sales cycles.
AHAM appreciates the opportunity to submit comments on the ENERGY STAR Product Specification for Dehumidifiers, Eligibility Criteria, Final Draft, Version 5.0 and would be glad to further discuss these matters should you so request.

Best Regards,

[Signature]

Jennifer Cleary
Vice President, Regulatory Affairs