

Ann Bailey, Director
ENERGY STAR Product Labeling
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program
Most Efficient@energystar.gov

Dear Ms. Bailey:

On behalf of Haier America, I would like to provide comments regarding the Environmental Protection Agencies (EPA's) proposal to include all top-mounted refrigerators that meet ENERGY STAR in the 2016 most efficient category.

Haier America has been an ENERGY STAR partner for many years and has been active in promoting the ENERGY STAR brand. We believe that ENERGY STAR is and will continue to be an important part of the overall energy program for the United States.

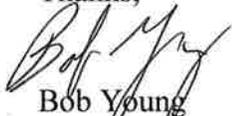
The EPA accurately stated that on "average, an ENERGY STAR top freezer model consumes about 375 kWh/year, while standard models of other configurations consume about 700 kWh/year—a notable difference in energy use." Haier America believes that this superior energy performance should be rewarded and promoted. The promotion of more energy efficient models, like top-mounted refrigerators, helps both consumers and the already crowded energy grid.

The present 2015 most efficient category includes all refrigerators that are at least 15% below federal requirements and use less than 637 kwh/yr. This criteria already favors lower internal volume refrigeration products. Haier America does not see this new proposal as setting any new precedent by including all ENERGY STAR top-mounted refrigerators.

Since ENERGY STAR and the most efficient category are voluntary programs, Haier America does not see this proposal as being in conflict with any requirement set by the Department of Energy; therefore, Haier America fully supports the proposal by the Environmental Protection Agency to include all Energy STAR compliant top-mounted refrigerators in the 2016 most efficient category.

Haier America appreciates the opportunity to provide comments to the EPA on this most important program. Please feel free to contact me directly if you would like to further discuss this issue.

Thanks,



Bob Young
Director of Product Approval