



1111 19th Street NW > Suite 402 > Washington, DC 20036
t 202.872.5955 f 202.872.9354 www.aham.org

December 7, 2020

Via E-Mail

Ga-Young Park
Product Manager, Appliances
ENERGY STAR Labeled Products
U.S. Environmental Protection Agency

appliances@epa.gov

Re: ENERGY STAR Draft Room Air Conditioner Specification 4.2

Dear Ms. Park:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I am writing to provide our comments on the Environmental Protection Agency's (EPA) Draft Room Air Conditioner Specification (version 4.2), released on October 26, 2020.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's more than 150 members employ hundreds of thousands of people in the U.S. and produce more than 95% of the household appliances shipped for sale within the U.S. The factory shipment value of these products is more than \$50 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 nearly \$200 billion annually to the economic security of the United States. 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.

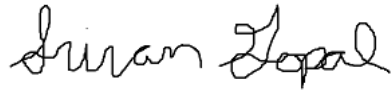
The change EPA is proposing to the Room Air Conditioner Specification allows manufacturers and brand owners the option to certify models as having connected functionality through an Alternative Demand Response Validation (ADRV). Under the proposal, manufacturers and brand owners with at least two models certified with connected functionality may forego demand response validation testing for new models by using an ADRV. The ADRV is a set of parameters developed and proposed by the manufacturer that predicts a basic model's ability to meet the demand response portion of the connected criteria. These parameters can include, but are not

limited to hardware and software documentation, connection types and capabilities, and computer simulations.

AHAM supports EPA's proposal. The proposed changes achieve the intended goals of reducing testing burden for connected products and possibly increasing ENERGY STAR participation for room air conditioners.

We thank EPA for considering ways to reduce testing burden and issuing this proposal and would be glad to further discuss this matter should you so request.

Best Regards,

A handwritten signature in black ink that reads "Sriram Gopal". The signature is written in a cursive style with a large initial 'S'.

Sriram Gopal
Director, Technology & Environmental Policy