



GE APPLIANCES
a Haier company

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Via E-Mail (appliances@epa.gov)

Ga-Young Park
Product Manager, Appliances
ENERGY STAR Labeled Products
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Re: ENERGY STAR Program Requirements, Product Specification for Room Air Conditioners, Version 4.2, Draft 1

Dear Ms. Park:

GE Appliances, a Haier company ("GEA"), respectfully submits the following comments to the Environmental Protection Agency ("EPA") in response to the EPA's Request for Comments on ENERGY STAR Product Specifications for Room Air Conditioners, Version 4.2, Draft 1. As an initial matter, GEA supports, in full, the December 7, 2020 comments of the Association of Home Appliance Manufacturers ("AHAM") and incorporates AHAM's comments into its own by reference.

GEA is a leading US manufacturer of home appliances and space conditioning products, including a full line of room and portable air conditioners as well as single package vertical units, packaged terminal air conditioners, and mini-split ductless and VRF systems. GEA has been a participant in and contributor to the ENERGY STAR program since its founding almost 30 years ago. GEA devotes substantial resources to the development of new technologies to increase energy efficiency and engineering products to meet demanding ENERGY STAR specifications.

GEA a leader in providing connected features in the home appliance industry. Indeed, GEA has the largest number of connected major appliance products on the market. GEA offers connected appliances in all major appliance categories including those with a built-in connected function as well as the ability to purchase adaptors to add connected features after purchase of an appliance. GEA believes that the share of connected appliances in consumers' homes will continue to increase and that connected features will become common in all major appliances. Importantly,

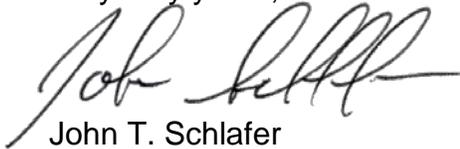
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connected appliances offer meaningful opportunity for reduction of energy consumption, which occurs both through greater consumer control over appliance operation and the incorporation of demand-response features.

GEA appreciates Energy Star's attention to the issue of certification of connected features and supports the changes proposed by EPA to the product specification for room air conditioners as set out in Draft 1 of Version 4.2. Consumers, industry, and the environment all benefit when regulations are crafted to provide a high level of reliability with the lowest testing burden reasonably possible. EPA's proposed revision to the product specification does just that. Further, Energy Star's proposed changes will help to support the inclusion of connected features in the marketplace, which GEA strongly supports.

GEA appreciates the opportunity to provide these comments. Please do not hesitate to contact me with any questions or concerns.

Very truly yours,

A handwritten signature in black ink, appearing to read "John T. Schlafer". The signature is fluid and cursive, with a long horizontal stroke at the end.

John T. Schlafer