

April 13, 2015

Via E-Mail

Melissa Fiffer  
Product Manager  
U.S. Environmental Protection Agency  
ENERGY STAR Appliance Program  
appliances@energystar.gov

Re: ENERGY STAR Program Requirements: Product Specification  
for Residential Dishwashers, Eligibility Criteria, Final Draft, Version 6.0

Dear Ms. Fiffer:

Samsung Electronics America, Inc. (SEA), a subsidiary of Samsung Electronics Co., Ltd. (Samsung), is pleased to provide the following comments on ENERGY STAR Program Requirements: Product Specification for Residential Dishwashers, Eligibility Criteria, Final Draft, Version 6.0.

Samsung Electronics is a world leader in technology and is one of the fastest growing home appliance brands in the United States. Samsung is the winner of the ENERGY STAR Partner of the Year Award for Sustained Excellence in 2013, 2014 and 2015. Samsung is committed to providing energy efficient home appliances to U.S. consumers and supports the ENERGY STAR program.

**I. Cleaning Performance Reporting:**

Samsung gladly notes that EPA has retained performance reporting requirements in the final draft at least on a voluntary basis at this time. Samsung believes consumers must be able to trust that the ENERGY STAR brand signifies energy efficiency without compromising product performance. This is very important because if the products are configured to achieve higher efficiency by compromising performance—for example, by washing dishes less thoroughly—consumers will come to value the ENERGY STAR brand less and will turn away from energy-saving products. This is especially important for the consumers who want innovative products that perform their basic function effectively while saving energy.

We also believe the voluntary reporting would help to EPA understand the distribution of cleaning performance levels in the qualified products and could pave the basis for establishing

cleaning performance levels in the future specification as well as provide an understanding of the test procedure limitations.

For these reasons, Samsung supports EPA's proposal to bring performance reporting into the ENERGY STAR standards for dishwashers. Samsung also believes EPA should expand the use of performance measurement as a qualifying factor in the near future, which would deter product configurations from achieving efficiency by compromising on performance.

## **II. Test Procedure Improvements:**

Samsung would like to bring the following points on current test procedure and its limitations to EPA's attention so the soiling levels can be revised in future EPA and DOE test procedures.

It is a common knowledge that pre-rinsing drastically increases the water and energy use beyond what the dishwashers use and what the test procedure measures today. Significant water and energy saving could result if the consumers could trust their dishwashers and stop the practice of pre-rinsing. Consumer Reports blogs indicate pre-rinsing can easily waste more than 6,000 gallons of water per household each year.<sup>1</sup> Samsung believes the soiling levels in the current DOE test, even the heavy soil condition, appear to reflect the pre-rinsing practiced by the consumers.

Samsung proposes that the EPA/DOE test procedure reflect the soiling condition without pre-rinsing. This would encourage dishwasher cycles to be properly designed to work under soiling condition without pre-rinsing, which will encourage the consumers to avoid pre-rinsing of dishware, resulting in saving significant amount of water and energy. Soiling levels per AHAM DW-1 2009 could represent soiling condition without pre-rinsing.

Such a test procedure could also drive stakeholder actions. For example, the stakeholders may jointly educate consumers not to pre-rinse as the dishwashers were designed, rated and qualified to provide best cleaning under the soiling condition without pre-rinsing. Thus, Samsung proposes that the EPA/DOE test procedure reflect the soiling condition without pre-rinsing.

Samsung appreciates the opportunity to submit comments on the ENERGY STAR Product Specification for Residential Dishwashers, Eligibility Criteria, Final Draft, Version 6.0 and would be glad to further discuss these matters should you so request.

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<sup>1</sup> See <http://www.consumerreports.org/cro/news/2011/11/12-low-cost-ways-to-save-energy-and-money-now/index.htm>; See also <http://www.consumerreports.org/cro/news/2012/04/stop-pre-rinsing-and-let-the-dishwasher-do-its-job/index.htm>; See also <http://www.consumerreports.org/cro/news/2014/04/6-ways-to-save-energy-and-money-right-now/index.htm>

Respectfully submitted,

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