



Ann Bailey, Director
ENERGY STAR Product Labeling
Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Sent by e-mail to MostEfficient@energystar.gov

Re: Environmental Protection Agency's (EPA) ENERGY STAR Most Efficient Draft 2018 Recognition Criteria

Dear Ms. Bailey:

Samsung Electronics America ("Samsung") respectfully submits these comments on the EPA's ENERGY STAR Most Efficient Draft 2018 Recognition Criteria ("Most Efficient").

Samsung is a world leader in technology and is one of the fastest growing home appliance brands in the United States. Committed to providing energy efficient home appliances to U.S. consumers, Samsung is the winner of the ENERGY STAR Partner of the Year Award for Sustained Excellence in 2013, 2014, 2015 and 2016.

I. Connected Credit

Since connected functionality in home appliances is still evolving technologically, Samsung believes that the 5% credit should be allowed for Most Efficient qualification similar to ENERGY STAR qualification. We understand that the Consortium for Energy Efficiency ("CEE") is also considering recognition of connected products in their future proposal and hence recognition in Most Efficient would further drive a consistent message on connected products and their continued potential for improved systemic energy efficiency.

II. Clothes Washers

Samsung supports EPA's continued use of the same requirements for top-load and front-load clothes washers in order to qualify for the Most Efficient recognition. This furthers the intent of the program to recognize and reward the products that achieve the highest level of efficiency. Samsung notes that EPA's 2018 criteria would result in alignment of Most Efficient criteria for clothes washers with the CEE clothes washer proposal—specifically, the CEE Tier 2 criteria. Alignment between CEE and ENERGY STAR Most Efficient at the CEE Tier 2 level will be essential to reduce confusion for many efficiency incentive programs around the nation.

In the future as ENERGY STAR program staff consider changes to the ENERGY STAR washer specification, Samsung encourages a technology neutral approach for ENERGY STAR criteria to reflect a similar approach by combining categories for front-load and top-load washers in future

specifications on clothes washers. ENERGY STAR currently maintains separate categories for front-loading and top-loading washers, and therefore allows some top-loading models to qualify for ENERGY STAR even though they are less efficient than some non-qualified front-loading models. Because both front-load and top-load types of washers serve the same function, they should be subject to the same requirements to prevent consumer confusion. In turn, such a technology neutral approach would allow complete alignment between CEE Tier I levels and ENERGY STAR.

III. Clothes Dryers

EPA proposes maintaining the 2017 criteria for dryers and we support the decision to maintain these levels as the market penetration of qualifying models is still low. In order to allow for technology to evolve in the clothes dryer category, Samsung supports EPA's decision.

Samsung appreciates the opportunity to comment on EPA's ENERGY STAR Most Efficient Draft 2018 Recognition Criteria. We would gladly welcome the opportunity to discuss these matters further.

Respectfully submitted,

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