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February 22, 2017

Via Email

Katharine Kaplan  
U.S. Environmental Protection Agency  
ENERGY STAR® Appliance Program  
[appliances@energystar.gov](mailto:appliances@energystar.gov)

**Re: ENERGY STAR Product Specification Update Proposal for Clothes Dryers Version 1.1**

Dear Ms. Kaplan:

Thank you for the opportunity to comment on this specification update proposal for clothes dryers. We appreciate the collaboration that continues to be encouraged by the Environmental Protection Agency (EPA) and shared between its stakeholders.

As a very active member of the Association of Home Appliance Manufacturers (AHAM), Whirlpool Corporation has worked closely with them in the development of the comments they submitted (under separate cover) on this specification update proposal. **Please be advised that we support and echo the positions taken by AHAM; particularly the position to delay the finalization of this proposal during a time of administrative transition and while the new EPA and DOE administrations evaluate additional programmatic changes to ENERGY STAR. Our comments address concerns we have where AHAM cannot take an industry position.**

First, we believe that such a proposal has the potential to generate significant dialogue and comments among impacted stakeholders. To allow for full stakeholder consideration and comment on such a proposal, we believe that this can only be accomplished during the specification development process. Minor modifications to existing specifications should be reserved for clarifications to existing requirements and not entirely new definitions or requirements, as was proposed. While we appreciate EPA's effort to quickly respond to new product types entering the market, we recommend that EPA defer this definition creation to the next full specification update.

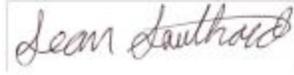
Second, we recognize that a manufacturer has already qualified models covered under this proposed definition to the Version 1.0 specification. We are not entirely sure how this manufacturer has tested such a product type to the Appendix D2 test procedure without first applying for and receiving a Department of Energy (DOE) test procedure waiver. We recommend that EPA work directly with DOE, the manufacturer, and the manufacturer's certification body to determine how this product type was tested, and whether the manufacturer should have received a test procedure waiver.

If the manufacturer should have received a waiver, as confirmed by DOE, we recommend that EPA immediately de-list affected models in the ENERGY STAR Qualified Products List, and require the affected manufacturer to immediately remove all ENERGY STAR from all marketing collateral (on-product, online, point-of-purchase, etc.). In addition, manufacturers should not

be distributing improperly tested products in U.S. commerce. It is a prohibited act subjecting the offending company to enforcement action, under 10 CFR 429.102. DOE can and should address that concern directly with the manufacturer.

Thank you again for your consideration and we look forward to continued collaboration. As always, please do not hesitate to ask us for any clarifications on these comments.

Sincerely,

A handwritten signature in cursive script, enclosed in a thin black rectangular border. The signature reads "Sean Southard".

Sean Southard  
Manager, Regulatory Affairs  
Whirlpool Corporation