



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

January 7, 2011

Via E-Mail

Katharine Kaplan
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program
appliances@energystar.gov

Re: ENERGY STAR Program Requirements Product Specification for Clothes Washers, Eligibility Criteria, Version 6.1 (Commercial Clothes Washers)

Dear Ms. Kaplan:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the proposed clarification to Version 6.0 of the ENERGY STAR Program Requirements Product Specification for Clothes Washers, Eligibility Criteria, Version 6.0 (Commercial Clothes Washers), which will be reflected in a Version 6.1. AHAM thanks EPA for extending the deadline for comments from December 28, 2012, to January 7, 2013.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 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 significantly to U.S. jobs and economic security. 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 continual energy efficiency improvement, as long as product performance can be maintained for the consumer. AHAM continues to believe that DOE's regulations must be the foundation for the ENERGY STAR program.

The current Version 6.0 commercial clothes washer definition does not include a defined capacity limitation on eligible products. Thus, EPA proposed to clarify that a commercial clothes washer, for purposes of ENERGY STAR qualification, cannot exceed 6.0 cubic feet.

Specifically, EPA proposed the following definition (with redlines showing the proposed changes to the existing Version 6.0 definition):

Commercial Clothes Washer: A soft-mounted front-loading or soft-mounted top-loading clothes washer that has a clothes container compartment that is not more than 6.0 cubic feet and that is defined for use in: (i) Applications in which the occupants of more than one household will be using the clothes washer, such as multi-family housing common areas and coin laundries; or (ii) Other commercial applications.

EPA selected 6.0 cubic feet as the capacity limitation because Table 5.1 in Appendix J1, the DOE clothes washer test procedure, does not go beyond 6.0 cubic feet. AHAM appreciates EPA's proposal to be consistent with the DOE test procedure. But EPA must also be consistent with the DOE *definition* for commercial clothes washer, which defines covered commercial clothes washers as having different limits on capacity. Specifically, in 10 C.F.R. 431.152 DOE defines a commercial clothes washer as follows:

Commercial clothes washer means a soft-mounted front-loading or soft-mounted top-loading clothes washer that—(1) Has a clothes container compartment that—(i) For horizontal-axis clothes washers, is not more than 3.5 cubic feet; and (ii) For vertical-axis clothes washers, is not more than 4.0 cubic feet; and (2) is designed for use in—(i) Applications in which the occupants of more than one household will be using the clothes washer, such as multi-family housing common areas and coin laundries; or (ii) Other commercial applications. (emphasis added).

As we have commented in the past, EPA's definitions should be identical to those in DOE's regulations in order to provide consistency and clarity to stakeholders. DOE's regulations are to be the foundation for the ENERGY STAR program. Thus, EPA should not use an approach that varies from DOE's approach. Varying from DOE's approach, as is evidenced from the need for a clarification in this case, creates confusion for stakeholders, and, ultimately, consumers.

With regard to commercial clothes washers, manufacturers might not design commercial clothes washers with larger capacities than those in the DOE definition on the same platforms as those that are designed to comply with DOE's standards. Thus, extending the capacity to allow larger units to qualify for ENERGY STAR is not a decision to be taken lightly. AHAM suggests that EPA contact individual manufacturers to further discuss the potential impact of increasing the capacity limit beyond those provided for in the DOE definition. Larger units may be designed to meet different requirements and their design and utility could be impacted were EPA to extend ENERGY STAR qualification to those units. Accordingly, we urge EPA to adopt DOE's definition for commercial clothes washers and to cite that definition rather than copy and paste it so that the definitions are identical at all times. That is the best way to provide consistency and clarity to stakeholders.

AHAM appreciates the opportunity to submit these comments on ENERGY STAR's proposal regarding a clarification to the commercial clothes washer definition in a new Version 6.1 of the clothes washer ENERGY STAR specification. We would be glad to discuss this matter further should you request.

Best Regards,

A handwritten signature in black ink, appearing to read "Jennifer Cleary". The signature is written in a cursive, flowing style with a prominent loop at the end of the last name.

Jennifer Cleary
Director, Regulatory Affairs