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BSH HOME APPLIANCES CORPORATION

April 15, 2014

Via E-Mail

Amanda Stevens  
U.S. Environmental Protection Agency  
ENERGY STAR Appliance Program  
appliances@energystar.gov

Re: **ENERGY STAR Program Requirements Product Specification for  
Residential Clothes Dryers, Eligibility Criteria, Final Draft, Version 1.0**

Dear Ms. Stevens:

On behalf of the BSH Home Appliances Corporation, we ask for your consideration with respect to the following comments.

BSH is a major world-wide manufacturer of home appliances. Currently we have US locations in North Carolina, Tennessee, and California. Our products range from small counter-top units, such as coffee makers, through the entire range of large in-home appliances including Laundry, Refrigeration, Cooking, and Dishwasher.

We appreciate the opportunity to comment, and your time and effort in taking these comments under consideration. BSH is committed to continually improving our products to meet the every changing and challenging demand of all stakeholders.

Should any clarifications be necessary, I am at your disposal and can be reached at (252)-636-4477 or through e-mail at [mike.peebles@bshg.com](mailto:mike.peebles@bshg.com).

Sincerely,

Mike Peebles

Technical Services Manager - Laundry  
BSH Home Appliances Corporation

## **BSH Comments**

### **ENERGY STAR Program Requirements Product Specification for Residential Clothes Dryers, Eligibility Criteria, Final Draft, Version 1.0**

BSH supports the governmental agencies of EPA and DOE in their efforts to provide incentives to all stakeholders with the goal of improving Clothes Dryer energy efficiency. The points below intend to highlight EPA's strength in leading the initiative and areas of improvement or concern.

1. BSH appreciates the removal of requiring the reporting of the "manufacturer-defined fastest cycle" by the EPA. This would have added undue burden and cost to our test efforts.
2. BSH does agree, in principal, with the EPA and DOE of moving toward using 10 CFR 430, Subpart B, Appendix D2 (**D2**). However, BSH does not agree with the EPA's proposed requirement of using D2 before it is mandatory under DOE. Requiring D2 for Energy Star eligibility will lead to:
  - Confusion in the market place due to different test methods being used (D1 and D2) leading to less energy efficient dryers having seemingly higher efficiency ratings.
  - Difficulties in harmonizing with Canada and their EnerGuide labeling. As Canada is still working to align with D1, EPA's requirement of D2 will cause double testing for the Manufactures.
3. Effective date of 1-Jan-2015. Only if the Test Method Reference is for D1 can BSH agree with this date.
4. BSH does not agree with the "User Information Requirements" proposal that product shall be shipped with informational materials to notify consumers of percent savings when using different cycles or settings (as indicated in "b." in this section). This requirement will lead to additional testing and reporting efforts.  
BSH does not oppose notifying consumers of the specific cycle and settings the energy use rating is based on or giving general statements such as "longer, low heat drying cycles use less energy, as do less dry settings."

Respectfully,  
Manfred Staebler  
Head of Government Affairs

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