



## GE Consumer & Industrial

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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 Room Air Conditioners, Eligibility Criteria, Draft 1, Version 3.0

Dear Ms. Stevens:

On behalf of GE Appliances (GE), I would like to provide our comments on the ENERGY STAR Program Requirements Product Specification for Room Air Conditioners, Eligibility Criteria, Draft 1, Version 3.0. GE has had a long commitment to energy efficiency, including the manufacture of energy efficient appliances, as evidenced by receipt this year of ENERGY STAR's Sustained Excellence award for the fifth straight year. As such we have a strong commitment to the value of the ENERGY STAR brand, and offer these comments to you in a spirit of partnership.

GE hereby adopts by reference the comments submitted by the Association of Home Appliance Manufacturers (AHAM) and supplements them in the following respects.

GE supports AHAM's comment urging EPA to revise the proposed effective date of the proposed specification changes to October 2012 in order to realistically account for industry-wide room air conditioner (RAC) production timelines, and believes the effective date as proposed is unworkable for RAC products. We would like to note specifically that we do not believe that the number of models EPA references as meeting the proposed new standard is reflective of actual market penetration, and, rather, that the models that do meet the proposed standard actually represent a small percentage of the sales of RAC product in any given year. For the vast majority of the market, models are not yet developed meeting this specification, and to rush development of these models in an unrealistic timeframe (if it is doable at all due to production schedules as discussed in the AHAM comments) risks product reliability and performance. Due to the seasonal nature of the product as

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well, we want to underscore the importance of EPA allowing at least 12 months for products to sell through once the new specification becomes effective.

GE continues to oppose the concept of a 35% penetration trigger for standard revisions within the ENERGY STAR program, and believes that the impact of this new approach is unknown and may be undesirable for products such as RAC. Particularly if EPA adopts an unworkable effective date for early 2012, manufacturers will be faced with a choice of significant product investment within a timeframe insufficient for product design, retooling, etc. on certain models, and producing models that meet the baseline federal efficiency standard instead. We are not convinced that jeopardizing robust ENERGY STAR participation of RAC products is worth the tradeoff of focusing on a much smaller segment of the market in a slightly earlier timeframe.

Please feel free to contact me at (502) 452-7603 with any questions.

Sincerely,



Kelley Kline  
Counsel, Regulatory