



Wahl Clipper Corporation • 2900 North Locust Street • P.O. Box 578 • Sterling, Illinois 61081-0578
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December 19, 2013

Ann Bailey
Chief, ENERGY STAR Labeling Branch
U.S. Environmental Protection Agency

batterychargers@energystar.gov

Re: Proposed Sunset of the Battery Charging Systems ENERGY STAR Program

Dear Ms. Bailey:

On behalf of Wahl clipper Corporation, We appreciate the opportunity to provide our comments on the proposed sunset of the battery charging systems (BCSs or battery chargers) ENERGY STAR program. The announcement came as a surprise as we thought EPA would be changing your program based on the new DOE standard and since this new standard has not been published we are not sure how such a decision was made. If the CEC regulation is going to be the new DOE regulation then maybe it is justified to discontinue the program. However, if that has yet to be decided then I do not think it is appropriate to terminate the program at this point in time.

The other issues we have with your announcement are that it does not give us much time to get all the packaging and product brochures changed and used up and the QPL being terminated so soon.

- 1) Not enough time for packaging and brochures being used up. The June 3, 2014 date is not enough time for slow moving product to be manufactured. We need at least a year to be sure all slow moving inventory of product and product information is used up. If all units were high volume June 2014 would be fine but not every product a company sells is a high volume unit and to get price breaks on packaging to keep cost down you may need to order 6-8 months of inventory. We do not believe it is right that the termination of an Energy star program should cost us extra money when we were one of the few companies that were promoting the Energy star label and giving customers an energy efficient unit when other manufactures were not. We feel we are being penalized for trying to do the right thing.
- 2) The QPI cannot be removed for at least 6 months after the final products are sold. We have several retailers that inspect our products 1 to 2 times a year to verify quality and performance. Part of that evaluation is to verify the product markings are valid. If EPA does not keep up the website with the approved data for a period after products are produced there is no way for us to prove to the retailers that the products were Energy Star Compliant. So there needs to be a way to satisfy the retailer requirements that a product can be marked.

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This may also be accomplished if EPA sent a letter listing the models and last date they could be produced to give to our retailers. I think it would be easier for you to just keep the website up for a while.

Since there is not much time after the comment period before your effective dates I hope our comments are considered before action is taken, again, thank-you for the opportunity to comment.

Sincerely,

Rick Habben
Safety Compliance Engineer

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