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January 26, 2011

Via E-Mail

Amanda Stevens
U.S. Environmental Protection Agency
appliances@energystar.gov

Re: ENERGY STAR® Program Requirements Product Specification For Room Air Conditioners, Eligibility Criteria, Draft 1, Version 3.0

Dear Ms. Stevens,

We appreciate the opportunity, through the collaborative effort that has been shared between the EPA and stakeholders, to comment on the draft specification that was put forth by the EPA on December 21, 2010. As a very active member of the Association of Home Appliance Manufacturers (AHAM), we have worked closely with them in the development of the comments they have submitted (under separate cover) regarding this matter. **Please be advised that we support and echo the positions taken by AHAM.**

Additionally, we would like to emphasize how crucial the timing is for the successful introduction of a new specification. Under EPA's anticipated schedule for the RAC specification revision, a final version of the specification would not be published until in May 2011 to be effective 9 months later (approximately February 2012). This is a highly seasonal business with peak selling time occurring from January thru June. A change in the ENERGY STAR specification during the selling season would be highly disruptive to manufacturers and retailers alike. Furthermore, because of the seasonal nature of the business, we have already made investments in product specification, production and marketing in preparation for the 2012 RAC season based on the current ENERGY STAR RAC specification. To change the ENERGY STAR qualification level in February 2012 would further put manufacturers and retailers in a compromising situation. Therefore, it is imperative to the success of the new specification that the effective date be no earlier than October 1, 2012 (i.e. after a full selling season). This will allow all manufacturers and retailers ample time to plan and deliver a reasonable amount of ENERGY STAR RAC products for consumers in 2013.

We appreciate your time and look forward to continued collaboration going forward. Our ongoing commitment to the growth, success and integrity of the ENERGY STAR promise is a strong source of pride for Whirlpool Corporation as a leader in designing, producing and marketing ENERGY STAR qualified appliances.

Sincerely,

A handwritten signature in black ink that reads "Nick Gillespie". The signature is written in a cursive, flowing style.

Nick Gillespie
Government Relations Senior Specialist