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November 28, 2011

Via Email

Amanda Stevens
U.S. Environmental Protection Agency
ENERGY STAR® Appliance Program
<mailto:appliances@energystar.gov>

Re: ENERGY STAR Product Specification for Commercial Clothes Washers Final Draft Version 6.0

Dear Ms. Stevens:

As a very active member of the Association of Home Appliance Manufacturers (AHAM), Whirlpool Corporation has worked closely with them in the development of the comments they submitted (under separate cover) on this matter. Please be advised that we support and echo the positions taken by AHAM.

Additionally, as we stated in our comments on August 29, 2011, Whirlpool Corporation supports the harmonization of the definition of a “commercial clothes washer” with the DOE definition, including the upper capacity limit of 3.5 cubic feet for horizontal-axis machines and the 4.0 cubic foot limit for vertical-axis machines. However, due to some “stakeholder feedback”, the EPA is now proposing to deviate from the DOE’s definition of a commercial clothes washer by eliminating the upper capacity limits. Detailed in the subsequent section of this document is our position on the latter.

Commercial Clothes Washer Definition

It is critical that EPA’s requirements are consistent with DOE regulations and test procedures. Without such consistency and uniformity, there will be significant confusion for both manufacturers and consumers. Therefore, we believe the EPA must have substantial reason for varying from DOE definitions and regulations. **If the motive for removing the upper capacity limits in the DOE definition is so certain stakeholders can have products that are larger than DOE capacity limits make the ENERGY STAR listing, we do not believe this is a valid reason to set a new precedent in the ENERGY STAR program.** Consistent with our previous stance on this subject, we feel stakeholders should pursue this kind of endeavor through the appropriate DOE process and if there is a change, ENERGY STAR definitions should be altered to mirror them.

Thank you again for your consideration and we look forward to continued collaboration with ENERGY STAR going forward.

Sincerely,

A handwritten signature in cursive script that reads "Nick Gillespie".

Nick Gillespie
Government Relations Senior Specialist