

REF No.	Topic	Comment	EPA Response
1	Cleaning/Rinse Performance	If EPA seeks to revise the commercial clothes washer specification in the future it is encouraged to review, at that time, whether it is appropriate to include cleaning and rinse performance metrics or to sunset the commercial clothes washer specification. At this time, there is no test procedure that measures both cleaning and rinse performance and is unnecessary.	EPA appreciates this feedback regarding the availability of test procedures for measuring cleaning and rinse performance. Based on this feedback, EPA plans to re-engage with stakeholders to explore both options when the clothes washer criteria are next reviewed for possible revision.
2	Cleaning/Rinse Performance	The coordination and re-use of standards between Europe and the USA is recommended. In Europe, the Commission has given a mandate to Cenelec TC 59 to develop a new standard for measurement of energy and water consumption, while also taking wash performance under consideration. The standard group (SWG 1:12) has just started up their work.	EPA appreciates this information and will take this under consideration when the commercial washer specification is next reviewed for possible revision. As a general policy, EPA has long supported the international harmonization of test procedures.
3	Scope	Supports the proposition of excluding "compact" and "all-in-one combination washer-dryers" from the ENERGY STAR program.	EPA appreciates the comment, but would like to note that a separate specification effort is currently underway to establish requirements for "all-in-one combination washer-dryers" that would allow such products to earn the ENERGY STAR based upon whole product performance. Further information is available on the ENERGY STAR website; please visit www.energystar.gov/revisedspecs and click on "Clothes Washers."
4	Definitions	Supports harmonizing the definition of "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.	Based on feedback received on this issue, EPA has harmonized with the DOE definition, but has excluded the maximum capacity requirement for the reasons cited below.
5	Definitions	The proposed change to harmonize with the DOE definition would create a market bias toward smaller capacity units and many highly efficient units will be excluded, resulting in consumer confusion and undermining of the brand. DOE has proposed amending the test procedure to allow testing of units up to 6.0 cubic feet. EPA should include units up to 6.0 cubic feet within ENERGY STAR.	Based on stakeholder feedback, EPA has harmonized with the DOE definition, but excluded the maximum capacity requirements. The current DOE clothes washer test procedure allows larger capacity clothes washers (up to 3.8 cubic feet), to be tested. DOE has also proposed changes to the test procedure that would permit testing washers as large as 6.0 cubic feet. Since larger commercial washers can offer provide both high efficiency and the opportunity for end-users to run larger and thus fewer loads, EPA does not feel it is appropriate to exclude larger products from the program. Note: this new ENERGY STAR definition does not have any impact on compliance with DOE standards for commercial clothes washers.
6	Definitions	EPA is encouraged to harmonize the ENERGY STAR definition of Modified Energy Factor and Water Factor with the DOE definition.	The Modified Energy Factor and Water Factor definitions have been harmonized with the DOE definition in the Final Draft specification.
7	Effective Date	The effective date of January 8, 2013 is supported, as it aligns with the date on which compliance with the new Federal energy efficiency standard for commercial clothes washers will be required.	EPA appreciates the comment and support for the effective date.

8	Model Number Reporting	Supports the proposed revision of the model number language, which clarifies that model numbers used for ENERGY STAR qualified product submissions should be equivalent to those used in compliance reports submitted to FTC and DOE.	EPA appreciates the comment and support for the proposed revisions of the model number language.
9	Proposed Criteria	The setting of a new efficiency level is opposed and EPA is encouraged to sunset the commercial clothes washer program. Raising the efficiency level eliminates the eligibility of top-loading clothes washers and forces the market into front-loading washers. The majority of top-load washers are manufactured within the United States while the majority of front-load washers are made outside of the US. EPA should support US manufacturers.	Many ENERGY STAR program stakeholders have supported the proposed levels, which are consistent with the current CEE Tier 2 levels. EPA has therefore retained these levels in the Draft Final Version 6.0. A number of manufacturers have supported setting new efficiency levels. EPA does not believe sunseting the program for commercial clothes washers is warranted at this point in time. Given the increases to the federal standards in 2013, EPA is strengthening the levels for commercial washers so that ENERGY STAR can continue to designate, for consumers, the most efficient products in the market.
10	Proposed Criteria	The proposed efficiency level promotes reduced consumer utility. Existing front-load washers at the proposed level have been found to have poor cleaning performance.	EPA too wants to ensure ENERGY STAR products deliver on consumer expectations for quality. EPA is unaware of any datasets that indicate models at higher efficiency levels have poor cleaning and/or rinse performance. Should such data become available, EPA will consider the data further and explore options for addressing.
11	Proposed Criteria	Supports the proposed ENERGY STAR commercial clothes washer criteria level with a Modified Energy Factor (MEF) ≥ 2.2 and a Water Factor (WF) ≤ 4.5 for V6.0.	EPA appreciates the comment and support for the proposed efficiency levels.
12	Qualification Testing and Sampling Plan	Supports using the US DOE Test Method for Clothes Washers, in 10 CFR 430 Subpart B Appendix J1.	EPA appreciates this comment.
13	Qualification Testing and Sampling Plan	It is important that a standard for commercial washers is both relevant for the products under test and feasible to perform for the involved companies/institutions without excessive costs. For instance hardness of water is costly to create. Test clothes should preferably be used more runs (especially if upper limit of compartment should be increased).	This feedback on test procedure considerations is appreciated by both EPA and DOE.
14	Qualification Testing and Sampling Plan	The proposal to reference DOE's sampling procedures is strongly supported. Allowing manufacturers to leverage testing performed for compliance with minimum efficiency standards is the efficient and accurate approach, while continuing to follow the DOE test procedure requirements.	EPA appreciates the comment and support for the proposed revisions to the sampling procedure language.
15	Significant Digits and Rounding	The proposal for significant digits and rounding is supported.	EPA appreciates the comment and support for the proposed revision to the significant digits and rounding language.
16	Reported Performance	EPA is encouraged to allow manufacturers the ability to report values conservatively, i.e. reporting more energy usage than limited test results show, to avoid compliance verification or challenge test failure.	For purposes of qualification, the reported value should be the certified rating as determined under DOE's regulations. This policy is contained in the EPA Certification Directive No. 2011-05: http://www.energystar.gov/ia/partners/downloads/mou/ES_Product_Certification_Directive_2011_5_Measured_vs_Reported.pdf