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June 16, 2011

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 2, Version 3.0

Dear Ms. Stevens:

Haier America is an industry leader in supplying Room Air Conditioner products in both the U.S and Canadian markets. We would like to submit here our comments on the ENERGY STAR Program Requirements Product Specification for Room Air Conditioners, Eligibility Criteria, Draft 2, Version 3.0.

I. Qualification Criteria

A. Energy Saver Mode

EPA proposes to require that “the fan may be cycled on for up to 60 seconds at a period of 5 minutes or greater to facilitate accurate control of room temperature”. For larger units such as 18K BTU and 24K BTU which will in all likely hood be placed in rooms greater than 500 square feet, 60 seconds of run time every five minutes may not be enough time to sample the air and gauge accurate control of the room temperature. Haier proposes to keep the ratio of 60 seconds of run time for every 5 minutes; however it should be at manufacturers discretion based on the end product. For example, on a 24K BTU unit, we can have a fan run time of 3 minutes every 15 minutes or 2 minutes every 10 minutes.

Best Regards,

Angelo Cacciatore
Compliance Engineer