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April 22, 2011

Abigail Daken  
U.S. Environmental Protection Agency  
ENERGY STAR Appliance Program  
appliances@energystar.gov

Re: ENERGY STAR Program Requirements Product Specification  
For Dehumidifiers, Eligibility Criteria, Draft 1, Version 3.0

Dear Ms. Daken:

Haier America is an industry leader in supplying Dehumidifier 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 Dehumidifiers, Eligibility Criteria, Draft 1, Version 3.0.

ENERGY STAR has a special importance for Haier. One of our objectives is being “Green,” and ENERGY STAR qualification plays an important role in meeting this objective. In addition, Haier has been a strong supporter of DOE/EPA energy and environmental programs. We urge EPA to revise the proposed effective date of the proposed specification changes to October 2012 in order to better account for industry-wide dehumidifiers production timeline.

EPA has indicated that under its anticipated schedule for the dehumidifier specification revision, a final version would be published sometime in September 2011, to become effective nine months later, on June 1 2012. Haier opposes this effective date as it does not take into account production timelines for this product category. Dehumidifiers are mostly sold in the summer. Product planning for the 2012 summer season has already started and by September, products for the summer 2012 season will already be in production. In order to meet the new proposed levels by June 1 2012, manufacturers would need to be planning for those products now; however product planning for a new specification level cannot begin until the product specifications have been finalized. In order to account for dehumidifier production timelines, Haier America suggests that the revised specification’s effective date be changed to October 2012. This date will allow manufacturers ample time to plan products that meet the revised requirements.

EPA has also proposed one level of energy efficiency requirements for dehumidifiers with a capacity of less than 75 pints/day to qualify for ENERGY STAR. Previous specifications have recognized several classes of dehumidifiers each with its own eligibility criteria. We believe that the increases in energy efficiencies is extreme as highlighted by the below chart.

Pint Size	Current EF	Proposed EF	Increase
≤25	1.2	1.9	<b>58.3%</b>
>25 to ≤35	1.4	1.9	<b>35.7%</b>
>35 to ≤45	1.5	1.9	<b>26.7%</b>
>45 to ≤54	1.6	1.9	<b>18.8%</b>
>54 to ≤75	1.6	1.9	<b>18.8%</b>
>75 to <185	2.5	2.8	<b>12.0%</b>

Having one level of energy efficiency for five different product classes is unfairly biased towards the larger size units since they can more easily meet the efficiency levels than the smaller size units. Haier America believes that the five product classes should remain in the ENERGY STAR specifications and the increase in energy efficiency should be incremental to the current efficiencies.

Best Regards,



Angelo Cacciatore  
Compliance Engineer  
Haier America