



September 20, 2013

By E-mail

Amanda Stevens  
U.S. Environmental Protection Agency  
ENERGY STAR Appliance Program  
appliances@energystar.gov

Re: ENERGY STAR Draft 2, Version 1.0 Clothes Dryer Specification

Dear Ms. Stevens:

Samsung Electronics America, Inc. (SEA), a subsidiary of Samsung Electronics Co., Ltd. (Samsung), respectfully submits the following comments on the ENERGY STAR Draft 2, Version 1.0 Clothes Dryer Specification.

Samsung Electronics is a world leader in technology and is one of the fastest-growing home appliance brands in the United States. Samsung is committed to providing energy efficient home appliances to U.S. consumers. The majority of Samsung appliances are ENERGY STAR qualified and highly rated for their performance, energy efficiency, and usability.

Samsung supports the Environmental Protection Agency (EPA) in its efforts to help consumers find best-in-class appliance products with superior energy efficiency with the ENERGY STAR program. This year, Samsung demonstrated its innovation in energy efficiency by earning the first-ever ENERGY STAR Emerging Technology Award for Advanced Clothes Dryers for its Model DV457, a 7.5 cu. ft. king-size capacity, touch screen LCD front-load dryer.

Samsung is also very pleased to have received the 2013 ENERGY STAR Partner of the Year – Sustained Excellence Award from the U.S. Environmental Protection Agency (EPA) for continued leadership in protecting the environment through various activities focused on providing products with superior energy efficiency.

Samsung generally supports and agrees with the Draft 2 specification proposals and eagerly anticipates the start of this new program. We believe it will help consumers choose dryers that can save significantly on energy in comparison to non-qualified dryers.

In particular, Samsung would like to endorse Draft 2's proposed reference, in calculating a unit's energy consumption, to the amended Department of Energy (DOE) clothes dryer test procedure published in July 2013 (Appendix D2 to Subpart B of Part 430 – Uniform Test Method for Measuring the Energy Consumption of Clothes Dryers).

Although the Appendix D2 test method is optional under the current DOE regulations, Samsung believes the advantages of this method over the previous test method make it appropriate as the basis for ENERGY STAR qualification for clothes dryers. This test procedure more accurately measures the effects of automatic cycle termination than the previous test method (in which the clothes dryer cycle is stopped manually by the operator), and it more realistically reflects the way consumers use a clothes dryer. The Appendix D2 test method rewards manufacturers that refine their automatic termination feature to terminate drying very close to the target two 2 percent maximum ending Remaining Moisture Content (RMC) using the DOE test load, without wasting energy by over-drying as has been observed on some dryer models.

Samsung wishes to note, however, that the Appendix D2 test method results in measuring significantly more energy consumption than the previous method, even for products with a highly refined termination control, because the target 2 percent RMC is lower than the target 5 percent RMC of the previous method. For this reason, EPA should conduct additional analysis of energy consumption using the Appendix D2 test method before confirming final consumption levels in Table 1 of the ENERGY STAR specification.

Samsung agrees with EPA's proposal to replace the drying time requirement in Draft 1 with a requirement to report drying time under the automated termination procedure. Gathering this information will enable EPA to gain an understanding of efficient dryers' performance.

Samsung will be glad to share information confidentially with EPA concerning energy consumption measured with the new test method and timelines for introducing products into the market that meet ENERGY STAR requirements, so as to help EPA identify appropriate consumption levels and an effective date for the new specification. Having already qualified a clothes dryer for the ENERGY STAR Emerging Technology Award this year, Samsung is confident that this new program will soon be ready for launch.

Respectfully submitted,

John Godfrey  
Vice Pres., Comms. Policy and Regulatory Affairs  
Samsung Electronics America, Inc.  
1200 New Hampshire Ave., NW #500  
Washington, DC 20036  
john.godfrey@samsung.com  
(202) 887-5667

Ravee Vaidhyanathan  
Sr. Engineering Mgr., American Technology Office  
Samsung Electronics America, Inc.  
19 Chapin Rd., Bldg. D  
Pine Brook, NJ 07058  
[ravee.v@samsung.com](mailto:ravee.v@samsung.com)  
(973) 808-6364