We would like to thank the EPA for giving us the opportunity to comment on the Draft 2 Version 1.0 Specifications for clothes dryers. It is an extremely positive step in the right direction to include ventless condensing dryers in the ENERGY Star Development Eligibility Criteria for Clothes Dryers. We would also like to take this opportunity to discuss technology that we have developed (patent pending) that is an indirectly heated ventless natural gas condensing clothes dryer.

European countries have determined that ventless condensing clothes dryers are extremely energy efficient and have rated them highly for efficiency, even more so than vented electric clothes dryers. An ENERGY Star rating and efficiency standards are a long time in coming and very necessary for the U.S. We have always been a global leader and now we have the opportunity to lead in the area of energy conservation with appliances, with notably the largest energy consumer in the household, the clothes drying appliance.

With the electric dryers' consumption upwards of 6 KW of load on the power grid at any one time, this is a definite factor on our nation's electrical infrastructure. Steps should be taken to lessen this strain as well as the CO2 produced into our environment.

The 2011 Scoping Report by the EPA (Link: http://www.energystar.gov/ia/products/downloads/ENERGY_STAR_Scoping_Report_Residential_Clothes_Dryers.pdf) points out indirectly heated dryers as being another possible energy-saving appliance. We would recommend that this type of heating method be included in the EPA's new draft specifications for standard dryers as well as for compact and ventless dryers.

Currently, ventless dryers cannot use natural gas as the energy source for their heat; they only use electricity as their energy source. The burning of natural gas in a ventless dryer is prohibitive because of toxic fume mitigation into the home. This problem has been solved in that we have developed the technology (patent pending) that allows natural gas use through an indirect heating method. Indirect heating of an appliance is already in use in the U.S. with water heating systems utilizing the vented home boiler, with energy-saving success. This type of technology can be used with the clothes drying appliance as well. We are including this link to our website that will help explain the technology we have developed and its advantages: http://www.hybridry.com/

In conclusion, we are encouraging a category for the indirectly-heated ventless clothes dryer. We very much would appreciate your feedback on this exciting new technology.

Thank you for your time, we appreciate it,

Sarah and Robert Zielewicz