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**Cc:** [Peter Widen](#)  
**Subject:** Comments on draft Version 3.1 ENERGY STAR Program Requirements for Room Air Conditioner  
**Date:** Friday, April 25, 2014 6:46:47 AM  
**Attachments:** [ENERGY STAR Draft Version 3.1 Room Air Conditioner Cover Memo.pdf](#)  
[ENERGY STAR Draft Version 3.1 Room Air Conditioner Specification.pdf](#)

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Dear Katharine,

Nice to contact with you! I am the Standard&Literature Manager of Global Home Comfort, Electrolux Home Products. We received the attached cover memo and specifications from AHAM last week. After studying these documents, we'd like to address our opinions as instructed.

As per the memo, EPA will collect the comments from the stakeholders before May 1st, and the new criteria will be officially released in early May, then become effective on June 1st. We think the lead time is so short that possible confusion may happen in the production during the lead time. As a result, we will have difficulties in coping with the situation. Also, per the scenario that EPA released Version 3.0 ENERGY STAR specifications for Room Air Conditioner, the lead time was about one year then. So we are wondering if the lead time could be longer than that mentioned in the memo. If so, we will suggest that the effective date be Oct 1st, 2014 or Apr 1st, 2015.

We look forward to your comments. Thanks!

Best regards!  
Roger

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