



**SEARS HOLDINGS**

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The Honorable Gina McCarthy  
Assistant Administrator - Office of Air and Radiation  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N. W.  
Mail Code: 6101A  
Washington, DC 20460

Dear Ms. McCarthy:

This letter is in response to the EPA's potential decision to establish March 2014 as the effective date for ENERGY STAR requirements, different than the date for the DOE standard changes on Refrigerators and Freezers. The Kenmore brand believes that having common implementation dates between ENERGY STAR and DOE standards will ensure more efficient market transitions to the benefit of consumers and the ENERGY STAR brand. In particular, the Kenmore brand believes:

- Multiple product transitions necessitated by successive change in standards creates undue complexities and costs;
- Consumer confusion likely will be created with label discrepancies (e.g., ENERGY STAR products with higher energy than non-ENERGY STAR); and
- ENERGY STAR brand equity may be at risk due to such consumer confusion.

Accordingly, the Kenmore brand prefers a September 15, 2014 effective date for the Refrigerator/Freezer ENERGY STAR Specification, aligning with the 2014 Department of Energy implementation date.

Sincerely,

Michael Castleman