



July 19, 2013

By E-mail

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

Re: ENERGY STAR Draft 2, Version 7.0 Clothes Washer Specification and Preliminary Approach for Determining Clothes Washer Performance

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 7.0 Clothes Washer 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. This year, Samsung 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 supports EPA and DOE in their efforts to help consumers find top class appliance products with superior energy efficiency with the ENERGY STAR program, including the Most Efficient and Emerging Technology awards for recognizing top technologies.

Samsung supports and agrees with most of the Draft 2 proposals, but would like to offer the following comments on the Draft 2 specification with respect to product classes and future performance criteria as outlined below.

1.0 Product Classes and Efficiency Criteria

1.1 Residential Top Loader / Residential Front Loader (>2.5 cubic feet)

In Draft 2, EPA has revised its position from Draft 1, which maintained single product class and efficiency criteria for both Top Loader (TL) and Front Loader (FL) clothes washers (>2.5 cubic feet), and has introduced separate product classes for TL and FL (>2.5 cubic feet) in Draft 2.

Samsung does not support having separate product classes for TL and FL clothes washers for ENERGY STAR.

Samsung believes that both TL and FL washers perform the same basic function, washing clothes, as EPA discussed in Draft 1. In addition, the physical size (footprint) is virtually the same between TL and FL washers.

Consumers today understand that TL and FL Energy Star washers are equivalent, as the current Energy Star criteria are the same between TL and FL washers. If FL and TL were separated, it would not be apparent to consumers that the FL ENERGY STAR qualified washers were generally much more efficient than the TL ENERGY STAR qualified washers, which would create confusion about ENERGY STAR. In addition, consumers would not understand the reason for the change from the current ENERGY STAR practice of treating all washers as one category.

In the Draft 2 specification and in the June 26, 2013, webinar which introduced it, EPA identified the key potential difference between TL and FL washers in terms of cycle time. However, with improvements in cycle times of FL washers (as shown in several recent *Consumer Reports* reviews), this difference is no longer relevant, and some newer front loaders have even shorter cycle times than top loaders.

Samsung also would like to point out that the Australian regulatory authority has a similar approach of rating TL and FL on the same basis for energy label and star ratings; see <http://www.energyrating.gov.au>. There is no evidence that combining the categories has confused consumers to date either in Australia or the United States; and there is every reason to expect confusion to arise from separating them.

1.2 Residential Clothes Washers (≤ 2.5 cu-ft)

Samsung supports EPA in proposing separate efficiency criteria for smaller capacity clothes washers (≤ 2.5 cu-ft) as we believe these smaller capacity washers cater to a market segment that consumers recognize as distinct. We believe these clothes washers should be able to be recognized for superior energy efficiency in their category and market segment. We support EPA's proposal to maintain TL and FL washers together in this category, for the reasons outlined above.

2.0 Preliminary Approach for Determining Clothes Washer Performance

Samsung supports DOE's and EPA's intention to develop test methods and minimum cleaning and rinsing performance requirements to be used in future ENERGY STAR clothes washer specifications. The performance criteria for TL and FL washers should be identical, as they have the same basic functionality. We support the proposed reporting requirement and will be glad to cooperate in developing a performance test procedure, which should be repeatable and reproducible with minimum test burden.

Respectfully submitted,

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