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March 26, 2012

Via E-Mail

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

Re: ENERGY STAR Draft 1 Test Method for Determining Residential Dishwasher Cleaning Performance

Dear Amanda,

Thank you for the opportunity to comment on the ENERGY STAR Draft 1 Test Method for Determining Residential Dishwasher Cleaning Performance (Draft Procedure). We also appreciate the extension of the deadline that was given.

As a very active member of the Association of Home Appliance Manufacturers (AHAM), we have worked closely with them in the development of the comments they have submitted (under separate cover) regarding this matter. Please be advised that we support and echo the positions taken by AHAM.

Additionally, we would like to emphasize how critical it is to ensure that the test procedure is repeatable and reproducible. As AHAM's comments point out, too much variation could result in false findings of noncompliance. To further expand upon our reservations and concerns, we cannot stress enough that a deep understanding of the variables involved in ensuring repeatability and reproducibility need to be complete before proceeding with cleaning score development. The key variables that have to be accounted for when maximizing repeatability and reproducibility include food soil batch, ambient temperatures, soil application techniques, relative humidity variability within and between laboratories, and grading techniques. As AHAM highlights in their comments, a round robin test is needed that includes manufacturer and third party test facilities and we feel it is imperative that the DOE organize and oversee such testing.

Thank you again for your time and we look forward to continued collaboration with the EPA and DOE going forward.

Sincerely,

A handwritten signature in dark ink, appearing to read "Nick Gillespie".

Nick Gillespie
Government Affairs Manager