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December 16, 2011

Via Email

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

Re: ENERGY STAR Draft 1 Version 5.0 Residential Refrigerators and Freezers Specification

Dear Ms. Stevens:

Whirlpool Corporation appreciates the opportunity to comment on this draft. Our ongoing commitment to the growth, success and integrity of the ENERGY STAR promise continues to be a strong source of pride for our company.

As a very active member of the Association of Home Appliance Manufacturers (AHAM), Whirlpool Corporation has worked closely with them in the development of the comments they submitted (under separate cover) on this matter. Please be advised that we support and echo the positions taken by AHAM. Additionally, we would like to reiterate what we communicated in our comments on August 10, 2011, which is the following:

- Continuing to have ENERGY STAR levels for manual and partial defrost full-size refrigerators, full-size freezers, compact refrigerators and compact freezer product classes will not allow for purchasers to recover their investment in increased energy efficiency through utility bill savings, within a reasonable period of time.

Violating this key guiding principle of the program undermines the credibility of the program with NGOs, utilities and manufacturers. Moreover, it risks diluting the ENERGY STAR brand with consumers who purchase these products when they realize their return on investment will not be achieved. That is why we feel that unless the EPA has data to the contrary, the sunseting of these specified product classes would be appropriate at this time and the EPA should exclude these products in Section 2B of the draft document.

Thank you again for your consideration and we look forward to continued collaboration with ENERGY STAR going forward.

Sincerely,

A handwritten signature in black ink that reads "Nick Gillespie".

Nick Gillespie
Government Relations Senior Specialist