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April 13, 2012

By E-Mail

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

Re: ENERGY STAR Program Requirements Product Specification for Clothes Washers,
Eligibility Criteria, Final Draft, Version 6.0, Combination (All-in-One) Washer-Dryers

Dear Ms. Stevens:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the ENERGY STAR Program Requirements Product Specification for Clothes Washers, Eligibility Criteria, Final Draft, Version 6.0 regarding combination (all-in-one) washer-dryers.

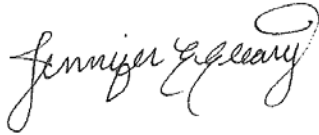
AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's more than 150 members employ tens of thousands of people in the U.S. and produce more than 95% of the household appliances shipped for sale within the U.S. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

In the final draft of the specification, EPA decided that it should wait to consider clothes washers with an optional dry cycle "until there is both a selection of products with an optional dry cycle available on the market and appropriate testing standards have been developed for them."

AHAM is not commenting on whether or not residential clothes washers with optional dry cycles should be eligible for ENERGY STAR as a general matter. But we agree with EPA that a more detailed evaluation and process is necessary, as is consultation with DOE. As we previously commented, and we thank EPA for accepting our comments to this effect, research needs to be done to determine whether the criteria for clothes washers are appropriate for clothes washers with optional dry cycles and how such products can be tested.

AHAM appreciates the opportunity to submit these comments on the ENERGY STAR Program Requirements Product Specification for Clothes Washers, Eligibility Criteria, Final Draft, Version 6.0 regarding combination (all-in-one) washer-dryers, and would be glad to further discuss these matters should you so request.

Respectfully submitted,

A handwritten signature in cursive script that reads "Jennifer Cleary". The signature is written in black ink and is positioned above the printed name and title.

Jennifer Cleary
Director, Regulatory Affairs