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August 24, 2011

Ms. Amanda Stevens
ENERGY STAR Appliance Program
U.S. Environmental Protection Agency
1310 L Street, NW
Washington, DC 20005

Dear Ms. Stevens,

Alliance Laundry Systems is North America's largest commercial laundry equipment manufacturer. We manufacture commercial clothes washers under the Speed Queen™, Huebsch™, and Unimac™, and IPSO™ trademarks in Ripon, Wisconsin. We employ approximately 1,300 people. Thank you for the opportunity to comment on the proposed Commercial Clothes Washer 2013 Qualification Levels and Product Specifications as recently announced on Eligibility Criteria Draft 1 Version 6.0. The following are our comments.

1.) Proposed Level of MEF \geq 2.2 and WF \leq 4.5

Alliance Laundry Systems (ALS) opposes the proposal and ALS requests that the program "sunset" for the following reasons:

a.) The proposed level eliminates the eligibility of Top-Loading clothes washers (TLW), the vast majority of which are manufactured in the United States, instead of forcing the market into Front-Loading clothes washers (FLW), the vast majority of which are made outside of the U.S. EPA should appreciate and encourage continued manufacturer offerings and benefits of both types of commercial clothes washers, while supporting US manufacturers.

b.) The proposed level promotes "lessening of consumer utility" of commercial clothes washers. Existing competitive front-loading washers in the commercial clothes washer marketplace at the proposed level have been found to have so little water in the wash cycle that the CENTER OF THE CLOTHES LOAD WAS DRY AND HAD NOT BEEN WETTED AT THE END OF THE WASH TUMBLE CYCLE. Obviously, the cleaning performance of this machine was found to have been unsatisfactory in our ALS lab.

2.) Definition of Commercial Clothes Washer (CCW)

ALS supports the proposed definition, which is consistent with the US Dept of Energy (DOE) definition.

a) H-axis (FLW) of not more than 3.5 cubic feet should **not** be changed unilaterally by EPA ENERGY STAR to a larger capacity such as 4.0 or even greater. Any manufacturer of a larger capacity than 3.5 cubic feet was aware of the DOE definition limits and should **not** be given special consideration. THIS IS ESPECIALLY TRUE IF THE MANUFACTURER IS A FOREIGN MANUFACTURER.

b) ALS supports EPA's proposed excluded product of "compact" (less than 1.6 cubic feet capacity) and "all-in-one combo washer/dryers", and products that are covered under other ENERGY STAR product specifications.

3.) Significant Digits and Rounding

ALS supports the proposal, as we have always followed the proposed rules for reporting energy efficiency data. We also want to be allowed to report values "conservatively" (report more energy usage than limited test results show) to avoid any compliance verification or challenge test failure.

4.) Model Numbers

ALS supports the proposal that model numbers reported to ENERGY STAR be consistent with the model numbers reported to the Federal Trade Commission (FTC) and the US Department of Energy (DOE).

5.) Qualification Testing and Sampling Plan

a.) ALS supports utilizing the US DOE Test Method for Clothes Washers of 10 CFR 430 Subpart B Appendix J1 for the EPA ENERGY STAR “2013 Commercial Clothes Washer” eligibility specification.

b.) ALS supports utilizing the US DOE sampling plan as found in the March 7, 2011 DOE Final Rule on Compliance, Certification and Enforcement and codified in 10 CFR §429.46 with references to 10 CFR § 429.11. No commercial clothes washer should be allowed to be qualified with only 1-test sample being tested. At least 4-samples should be tested.

6.) Effective Date

ALS supports the proposal consistent with the next US DOE Minimum Standard for Commercial Clothes Washers effective date of the January 8, 2013.

Respectfully submitted,



Philip J. Manthei
Sr. Staff Engineer, Agency/Codes Approval

Cc: Scott Spiller, VP Chief Legal Officer
Bruce Rounds, VP Chief Financial Officer
Jeff Brothers, Sr. VP Sales
Bob Baudhuin, VP Product Engineering
Ryan Fogle – D&R International