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Via E-Mail

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

Re: ENERGY STAR Dishwasher Specification, Draft 1 Version 5.0'

Dear Ms. Stevens,

I reviewed the draft dishwasher protocol document and have a few comments. I have listed them below. Please feel free to call me with any questions.

1. Definitions:

A. Residential Dishwasher: In the list of items cleaned by this appliance, I suggest specifically mentioning cookware, especially since the soils on these items are generally baked on and tougher to remove.

B. Compact Dishwasher: Would this include countertop models? If so, I suggest stating so.

D. Product Family: Differences within product families of dishwashers can also include front panel colors (white, black, stainless) and interior rack upgrades for easier loading.

2. Scope

Again, would countertop dishwashers be included here? What about portables?

Cleaning Performance Requirements:

1. I would recommend citing the current AHAM Dishwasher test. Perhaps those with better first-hand knowledge of the procedure can offer more insight, but as an ANSI accredited standard, that seems the best accepted method. It appears very labor intensive and in our

Good Housekeeping experience, we find soil needs to be baked on to better discriminate between machines. The method does include a variety of soils, which is good. I would like to see a cookware component.

2. I don't believe more than one cleaning performance test should be allowed by EPA.
3. I recommend using the cleaning index outlined in the procedure. Perhaps a score/gallon of water used can be devised, so those machines that provide the best cleaning using the least amount of water achieve Energy Star certification.
4. I am not familiar with the score achieved in the AHAM standard, but perhaps something equivalent to a 4 out of 5, or similar ratio should be required.
5. I am not aware of any data.
6. I would prefer to see a minimum acceptable score rather than tolerances.

Thanks again for the opportunity to participate.

Sincerely,

Carolyn Forte  
Director, Home Appliances and Cleaning Products  
Good Housekeeping Research Institute