



Kristen Taddonio  
Energy Star Product Development  
US Environmental Protection Agency  
Washington, D.C. 20460

May 25, 2010

Comments re discontinuing the qualification of combination washer-dryers

Dear Ms. Taddonio,

With reference to the letter of May 14, 2010 written by Katharine Kaplan we would like to provide our comments on this subject.

1. We believe it is a retrograde step to discontinue the qualification of combination washer-dryers from inclusion in the Energy Star label program. Manufacturers of combination washer-dryers who have made investments and have taken steps to comply with the requirements of the Energy-Star program should be allowed to continue to do so.
2. In fact, under these guidelines, Equator, as a manufacturer of green appliances, was the first company to have a laundry machine approved by Energy-Star when the program first started to qualify laundry products back in 1997. These took into account only the washer section, since it has been pointed out; DOE only had test procedures for the washers.
3. The fact that there are no procedures to test dryers is by itself not a reason to penalize the product by disqualifying the entire combo unit.
4. The fair answer will be to allow the washer section to be tested against other washers, and the dryer section to be tested with other dryers (when such testing procedure is established by DOE).
5. The washer section of the unit consumes more water and energy than the dryer section, and having this unregulated for combos will unnecessarily allow inefficient combos (in the washer segment) to flood the market. Not only is this needless, but is a let down for those of us who have made the investment to ensure that our combos are Energy-Star compliant.
6. The biggest losers will be the customers who currently are purchasing Energy Star combos. With discontinuation of the label, combos would not longer qualify for rebates.



7. This also does not address the qualification of vented combination machines, i.e. those which vent air and do not use any water. In fact the blower motor of most 110V combos is only 1300W, much less than the average 5000W used by most dryers.

We believe the answer is to have a new Energy-Star logo created specifically for qualifying combos that says "Energy-Star Washer". This way it will be clear to the consumer that only the washer section qualifies with the requirements.

As and when DOE comes out with dryer test procedures, we agree that combos will need to be tested for those as well. In fact, combos, will need to comply with both washer-dryer sections order to get the Energy-Star label.

We appreciate the opportunity to make our comments on this subject, and hope that our concerns will be taken into account. Please do not hesitate to call if you have any questions.

Respectfully,

A handwritten signature in blue ink that reads "Atul Vir". The signature is written in a cursive style and is underlined.

Atul Vir  
President