

## Indesit Comments

Dear Kristen,

Here is Indesit comment to your enquiry over method A and B. I think we can simplify the issue if we consider that **the basic difference between the 2 methods A and B is in the initial moisture for the drying process:**

- method A the initial moisture is the nominal moisture currently used for DOE tumble dryer testing,
- method B the initial moisture is the RMC after the washing process.
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All the pros and cons you have listed are true, with the exception that **method B does not need further development**. If you consider that method B still allows to:

- follow 10CFR430 Subpart B appendix J1 for the washing part,
- follow 10CFR430 Subpart B appendix D for the drying part or the SNO PR: for the drying test leave in the machine only the load weight required by DOE method,

The issue of combining washing and drying energy is independent from the choice of method A or B: in both cases you need to make an assumption on the relative weight to give to each part of the cycle. However I think a research on user habits is not really necessary since in 10CFR430 Subpart B appendix J1 there is already a number for dryer usage factor, currently used for calculating washer MEF contribution deriving from its RMC.

DUF=dryer usage factor, percentage of washer loads dried in a clothes dryer=0.84.

[10CFR430 Subpart B, page 233]

As [already](#) stated **Indesit would prefer a method where initial moisture for the dryer is the final moisture of the washer (method B)**, however our main goal is to have a method for informing the user about the most energy efficient all-in-one models.

I have seen AHAM reply, Indesit shares the concern that aiming at the SNO PR may be too ambitious and may jeopardize our mail goal; however, we do not think that a specific consumer research is necessary to allow a measurement of all-in-one, as stated above we already have the specification we need in the current DOE methods, we think we should use what we have in order to solve this issue in due time.

Thank you for the opportunity to give a contribution,

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