
BSH HOME APPLIANCES CORPORATION

May 9, 2011

Via E-Mail

Ashley Armstrong
U.S. Department of Energy
Building Technologies Program
1000 Independence Avenue, SW
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ESTARVerificationTesting@ee.doe.gov

Re: BSH Comments regarding the document titled "DOE Verification Testing in Support of ENERGY STAR" dated April 22, 2011.

Dear Ms. Armstrong:

BSH supports the efforts of the Environmental Protection Agency (EPA) and Department of Energy (DOE) to ensure products meet the labeled energy ratings. We encourage an open approach with stakeholder involvement. BSH offers the following comments for consideration.

Section 6.1: Test Lab Selection

- We fully agree that test labs should have ISO 17025 accreditation, but further would state that the test lab should have extensive experience conducting the specific test and the labs are setup to efficiently run the specific test.
- AHAM recently visited three labs and witness them conducting energy test. All three labs had different interpretations of the test procedures. These same labs are currently EPA approved labs. Without consistency in test methods it will be impossible to run an effective verification and enforcement program. In order to have repeatable and reproducible results the test procedures need to be reviewed and interpretations developed, before any enforcement or verification testing begins.

Section 6.2: Applicable Test Procedures

- We support the efforts of DOE and EPA to issue test procedure interpretations when necessary. However we feel that the industry experts that were involved in the creation of the test procedures should have input before final interpretations are issued.
- In addition, we feel that it is important for DOE to provide the same guidance or test procedure interpretations to all involved and at the same time.
- We also would like to point out that we feel that the DOE Guidance Website is a great tool, but must be supported by an email notification.
- Finally, we feel that in cases where a new interpretation or waivers would cause a units energy ratings to change, that DOE, EPA and FTC would accept modifications to the listed values and allow a reasonable time for the manufacturer to implement changes.

Section 6.3: Manufacturer Notification

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- It is our opinion that the Manufacturer should be involved in the verification testing and should be encouraged to witness testing. Most reputable labs agree with this philosophy since it provides a review of test methods. In fact we feel that it is imperative that Manufacturers be able to witness testing. The purpose of witnessing the test is not to influence, but to ensure that methods are identical. The witnessing of test is commonplace in the safety program, where failures are of a more critical nature. With the current direction, as soon as a third party lab finds non-compliance, the Manufacturer will have to pay to have an identical unit tested to check and see if the lab is following the correct procedure. As the program begins, it is critical to have stakeholder involvement in all areas until all the issues are resolved.

Section 6.4: Determining if a Product Meets the ENERGY STAR Specification

- We applaud the changes outlined in Section 6.4.2 that allows testing of one unit as a spot check and then an additional three units if necessary. But we question why it would not be allowed to test up to the same quantity that was tested in the qualification test. In some cases this could be problematic since testing 4 units will not provide the same statistical results as a larger sample size.
- DOE has recognized that manufacturers may choose to conservatively rate and this should be specifically stated in the test procedures and guidance documents.

BSH appreciates the opportunity to submit these comments and would be glad to further discuss these matters should you so request.

Sincerely,
Mike Edwards
Senior Design Engineer
BSH Home Appliances Dishwasher Division