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BSH HOME APPLIANCES CORPORATION

June 22, 2007

Richard H. Karney, P.E.

U. S. Department of Energy

1000 Independence Avenue, SW

Washington, DC 20585

Dear Mr. Karney,

BSH Home Appliances is in full support of the energy-saving efforts of the Energy Star® program and the change in criteria for qualification of refrigeration products to 20% below the DOE standards. However, we share the concerns expressed by other manufacturers with respect to the impact of the proposed implementation date. The lead times associated with changes in materials, processes and tooling for global manufacturers have become increasingly problematic in recent years.

We join these other manufacturers in urging the Department to delay implementation of the new criteria until 2009 to allow for a more complete revision of product lines in line with the new standards. We believe that by offering the consumers a more complete line-up of qualified products, we will hasten the market acceptance of such more efficient models and provide a greater long-term increase in energy savings.

Sincerely,



Scot Brown

Vice President, Sales

BSH Home Appliances Corporation

Thomas L. Tino

Director, Consumer Agency Relations

BSH Home Appliances Corporation

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