

May 24, 2007

Richard Karney, P.E.
ENERGY STAR Program Manager
U.S. Department of Energy
Mail stop EE2J
1000 Independence Avenue, SW.,
Washington, DC 20585

RE: ENERGY STAR Program Requirements for Residential Refrigerators and/or Freezers

Dear Mr. Karney,

Electrolux Major Appliances has recently reviewed the April 27, 2007 draft of the ENERGY STAR Program Requirements for Residential Refrigerators and/or Freezers. We recognize by the highlighted language the proposed changes to the specification as modifications to include product data submission to DOE, amendment to Qualifying Products and amendment to Test Criteria. The NAECA Criteria for Refrigerators and/or Freezers is highlighted for the new proposed energy level of 20% less than NAECA maximum for categories 1-7 and noted with the proposed effective timing of April 1, 2008.

The proposed effective timing presents problems to the existing complete Electrolux Major Appliances Refrigerator/Freezer ESTAR model fleet currently available. Although a few current models may, by some simple changes to electromechanical components make the new standard, many models and a large content of the fleet requires development resources to achieve this higher level of efficiency. Accomplishing this requires development cycle time to configure these products to these models and procuring investment resources. All of these tasks are very time weighted and historically has required at least 2 years to complete the development cycle. An April 1, 2008 effective start date allows less than one year -11 months from release of the initial draft. We believe this timing is too aggressive. We request the effective timing to be changed to a later date. We would prefer the timing to be January 1, 2009, but no earlier than November 1, 2008. In either case the suggested timing is less than development cycle. In both cases the model launch season and the new ESTAR specification fleet are available for the entire model year. With the current proposed timing, a large segment of the 2008 model season will be not include the new ENERGY STAR specification fleet and has the potential for significant harm to Electrolux Major Appliances.

We recognize the importance of the ENERGY STAR program and its impact to nationwide power consumption reduction and for this we prefer to continue to offer the entire refrigerator/freezer ENERGY STAR fleet.

We appreciate the opportunity to comment. We appreciate participating in the ENERGY STAR program. If you or your office needs further discussion, please feel free to contact us.

Sincerely,

Electrolux Major Appliances