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J.B. HOYT
DIRECTOR, GOVERNMENT RELATIONS

September 15, 2008

Mr. Richard Karney
ENERGY STAR® Products Manager
U.S. Department of Energy
Building Technologies Program
1000 Independence Avenue, SW
Washington, DC 20585-0121

Re: Proposed 2009, 2011 ENERGY STAR Criteria for Dishwashers

Dear Rich:

Whirlpool Corporation is supportive of the planned July 1, 2009 decrease in the ENERGY STAR qualification levels for Dishwashers as outlined in your letter of August 15, 2008. We particularly support the addition of the water consumption criteria. This is consistent with both the 2010 minimum efficiency standard and the national need for effective water efficiency.

With regard to the proposed second change in the qualification level, Whirlpool, as a member of AHAM, was involved in the development of the comments submitted by that organization. As such, our position opposing the July 1, 2011 change is based on those same points.

We continue to be concerned about the quality of the data which the Department of Energy utilizes in developing proposals such as this. As noted in your analysis, the number of models offered bears no correlation to the volume of sales of those models. As such, we believe that your analysis reflects the trends in this product, but not the absolute levels of ENERGY STAR product volumes.

Thank you for the opportunity to comment on this process.

Sincerely,

A handwritten signature in black ink, appearing to read "J.B. Hoyt". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Cc: Bill McNary, D&R International