



**Alliance Laundry Systems LLC**  
 Shepard Street, P.O. Box 990  
 Ripon, WI 54971-0990  
 USA  
 Tel 920.748.3121  
 Fax 920.748.4429

**ORIGINAL**



May 5, 2003

Secretary, Federal Trade Commission  
 Room H-159  
 600 Pennsylvania Ave., NW  
 Washington, DC 20580

Subject: **16 CFR Part 305 – Appliance Labeling Rule - Public Comments - Clarification**

This is a clarification to our previous comments dated April 30, 2003.

Regarding question #2 in the April 3, 2003 Federal Register notice by the Commission, we feel we need to clarify that depending on your perspective, two answers need to be provided. We previously answered the question as if the EnergyGuide label primary descriptor was for “on or after the January 1, 2004 effective date” of the new DOE Minimum Standard and the Appendix J1 Test Procedure, and the granting of the exemption to the Appliance Labeling Rule. Doing so shows that the J1 Appendix procedure yields a higher value, since it includes a new term “DE”, which accounts for the energy to dry the test load in an average clothes dryer. See repeated answer below: →

**2.) QUESTION:** “Are the differences between the results yielded by the new (J1) and the old (J) tests significant enough to warrant special advisory language on the EnergyGuide labels? Are the differences unbiased, or does one test yield consistently higher or lower results than the other?”

**COMMENT:** Yes, there exist significant differences in test results. The following shows actual test results of a model we manufacture today that is compliant to the Jan 1, 2004 DOE Energy Standard. The label “primary descriptor” (kWh/ year) values are as follows:

<u>J Test (older)</u>	<u>J1 Test (newer)</u>	<u>% Difference</u>
890 kWh/yr	1,172 kWh/yr	24%

It is quite apparent that that the “newer” value is significantly higher than the “old”. This type and approximate percent differences occur consistently.

**If however, the commission was seeking to answer the question as if the primary descriptor continued to use only the 1.) hot water heating energy “HE” and 2.) electrical energy (motor & lights, etc.) “ME”, similar to Appendix J, but the terms were measured by the new procedure Appendix J1 and excluded the dryer energy “DE”, then the answer is as follows:**

<u>J Test (older)</u>	<u>J1 Test (newer)</u>	<u>% Difference</u>
890 kWh/yr	665 kWh/yr	25%

It is quite apparent that that the “newer” value is significantly lower than the “old”, when measured by Appendix J1, but reported for labeling using same limited two terms as exist today. This type and approximate percent differences also occur consistently with this method.

I trust this covers both views, allowing the Commission to properly analyze the request for exemption.

Respectfully,

Phil Manthei  
 Sr. Staff Engineer, Agency/Codes Approval

Cc: S. Spiller, Esq., V.P. Legal & Human Resources