

Dear Kristen,

Thank you for allowing us this opportunity to respond to your May 14th notification concerning the government's unilateral proposal to no longer recognize combination washer-dryers as Energy Star products.

As an Energy Star partner, Westland Sales has imported, sold, marketed and supported the Splendide brand of vented and ventless combination washer-dryers in North America since 1984. We have been a supporter of the Energy Star program since 1997 and, over the years, have invested large sums of money to support the Energy Star brand.

After 13 years of allowing the current Energy Star clothes washer curriculum to apply to combination washer-dryers, it's difficult to fully understand why this change is being made so suddenly with little regard to companies like ours who have helped build the Energy Star brand through our conscious efforts of promoting and developing energy efficient appliances.

Functionally, our product is a washer with drying capability. The dryer is either vented or ventless depending on the model. The consumer can choose to wash clothes, dry them, or to wash and dry them automatically. The fact that we will be penalized for lack of Energy Star dryer testing standards, when the washer meets published Energy Star standards is concerning. By removing the mark from our product you will be eliminating complete and fair information that currently enables the consumer to make an informed choice. What incentive is left for manufacturers to create the most energy efficient products in this category?

Possible Solutions:

*Adopt existing testing standards and labeling accepted in Australia, where the washer and dryer energy rating system is obtained by joining the washer rating with the dryer rating.

* Add a note specifying "washer" to or below the Energy Star logo. The Energy Star website and qualifying clothes washer list could be updated to include the following statement: "Energy Star does not require test data for dryer performance and does not certify the efficiency of the dryer" (statement currently utilized by CEE).

We ask that your committee reconsider your proposal. If new standards are determined necessary, as partners, we will help in any way possible. Until new standards are developed, we would like to retain our current Energy Star status. Our 2010 marketing and customer price lists all reflect our current Energy Star standing.

No consumer has ever informed us that they misunderstood the present Energy Star label. It states "washer" and your website clearly states there is no current standard for drying appliances.

Please consider our request for a informative label, separate label or time to come up with a new standard before we remove a label we have used to promote our businesses energy conservation for the past 13 years.

Best regards,

Larry Lundbom
President
Westland Sales
"Larry Lundbom" <larry@westlandsales.com>