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J.B. HOYT
DIRECTOR, GOVERNMENT RELATIONS

July 10, 2006

Federal Trade Commission
Office of the Secretary
Room H-135 (Annex O)
600 Pennsylvania, NW
Washington, DC 20580

Filed Electronically at:
<https://secure.commentworks.com/FTCApplianceResearch>

Re: Appliance Labeling Research: No. P064200

To Whom It May Concern:

Whirlpool Corporation has reviewed the material provided in the Federal Register notice of June 23, 2006 and is generally in concurrence with the position taken by the Commission. Clearly, the various research conducted to date by interested parties has produced differing results. As suggested at the May 3, 2006 proceedings in Washington, further research should contribute significant clarity to the situation.

As we indicated at the workshop, in order to be credible and supportable, such research must be conducted by a recognized firm using appropriate statistical techniques. The decision of the Commission to engage Harris Interactive is consistent with this approach. We applaud this choice. One suggestion: Whirlpool's research experts do suggest that a sample size of 400 per cell (vs. 300) would allow more robust interpretation of results.

We further support researching of the additional label where the focal point is the annual operating cost. Intuitively, this would seem to provide consumers with a

direct basis on model-to-model comparison. The proposed research is clearly the manner to prove or disprove this intuition!

Thank you for the opportunity to respond to this matter. Whirlpool looks forward to further dialog with the Commission regarding this matter.

Sincerely,

cc: Hampton Newsome, Esq., FTC
David Calabrese, AHAM
Jill Notini, AHAM