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

Subject: **Energy Labeling, Project No. R511994**

Alliance Laundry Systems LLC manufactures covered clothes washers under the Speed Queen® and Huebsch® and Unimac® brands in the commercial segments of the market, and the Speed Queen® brand in the consumer retail segment of the market. These are our comments and responses to the questions listed in the November 2, 2005 *Federal Register* regarding the “effectiveness of the current energy label.”

Alliance Laundry Systems does not have any studies relating to the effectiveness of the FTC appliance energy label. However, as a member of the Association of Home Appliance Manufacturers (AHAM) we support the public comments submitted by AHAM, which contain a recent study on consumer understanding, usefulness and preference of the types of labels being considered by the Commission.

- 1.) We support that the “continuous-style” label should be retained as the AHAM study found.
- 2.) We oppose any “categorical-style” label for the following reasons:
  - a. The “Star-type” is confusing when the label also includes the ENERGY STAR logo.
  - b. The “European-type” contains performance attributes beyond energy disclosure.
  - c. “Bars” or “Stars” make two products which differ by only one kWh/year appear as a whole bar or star different, allowing consumers to perceive the two products as having a significantly different energy rating, when such is not the case.
- 3.) We support continued annual submission of manufacturer model energy data to the Commission as has existed for 25 years. We appreciate the on-line access to all manufacturer model data.
- 4.) We support AHAM’s recommendation to require new labels with revised “average-fuel-rates” every 3-years rather than concurrent with the existing driver of new labels whenever manufacturer annual submissions show the “range of comparability” changing by more than 15%. Sequencing every 3-years lessens the opportunity for confusion at point of sale when some products display energy costs based on older or newer average-fuel-rates. In this manner, all products would change displayed energy costs within the same year. This recommendation should not be confused with requiring new labels whenever the annual manufacturer submissions show the range of comparability changing by 15% or more. That requirement for new labels should still be retained.
- 5.) We recommend the Appliance Label Rule be amended to clarify that “Commercial Clothes Washers”, which were added as a “covered product” under the Energy Policy Act of 2005 (EPACT-2005) do NOT require energy labeling. Commercial Clothes Washers do not appear on showroom floors for buyers to make purchasing decisions. Labeling each commercial clothes washer would be a non-value added operation, adds cost to the product, and would be a burden to manufacturers.

- 6.) We recommend that Clothes Washer energy labels retain the existing format of “annual energy usage” in kWh/year, rather than the “efficiency rating” of Modified Energy Factor (MEF). The energy rating is consistent with Canada’s energy rating and avoids confusion when models are marketed in the US and Canada and contain an FTC label and a Canadian energy label. The same energy rating will appear on both labels avoiding the confusion if one displayed MEF and the other displayed kWh/year.
- 7.) The Commission should consider adding the on-line website URL to the energy labels so that consumers can more readily find all product energy ratings.

In summary, we support only minor changes to the existing Clothes Washer energy label consistent with AHAM’s recommendations and results of AHAM’s commissioned consumer study. We request clarification in the Rule that Commercial Clothes Washers do not require labeling.

Respectfully submitted,

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Sr. Staff Engineer, Agency/Codes Approval

Cc: S. Spiller, Esq., Chief Legal Officer  
S. Gaster, VP Operations