



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

February 28, 2013

Federal Trade Commission  
 Mr. Hampton Newsome  
 Attorney, Division of Enforcement  
 Bureau of Consumer Protection  
 Room M-8102B  
 600 Pennsylvania Ave., NW  
 Washington, DC 20580

Subject: **Our Public Comments – Energy Label Ranges, Matter No. R611004**

Alliance Laundry Systems LLC manufactures covered clothes washers under the Speed Queen™, Huebsch™, Unimac™, Cissell™, and IPSO™ 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 in response to Commission's Notice of Proposed Rulemaking (NOPR) published in the January 9, 2013 *Federal Register* regarding proposed amendments to the Appliance Labeling Rule 16CFRPart 305, and in particular a proposed "Conditional Exemption for Clothes Washers and Refrigerators".

### **Proposals Related to the Conditional Exemption**

#### **1.) Conditional Exemption for Clothes Washers**

We generally support the proposed conditional exemption for clothes washers, and thank FTC for acting on the industry's request and our comments under the other recently completed rulemaking. However, we recommend some minor changes to FTC's proposed text for the distinctive label proposed (Figure 2 in FTC's NOPR) for use during the transition period for the 2015 DOE Minimum Standard for clothes washers.

**We support AHAM's comments regarding the text to be displayed on the label.**

- i) In the upper large black-color box, first line, we support AHAM's proposal:
- **add the word "Only"** between the word "Compare" and the word "to"

Thus the new text would say:

***"Compare only to other labels with yellow numbers."***

- ii) In the upper large black-color box, second and third line, we support AHAM's proposal:
- Replace FTC's proposed text of:  
*"Appliances that have labels with black numbers were tested differently to estimate cost and electricity used."*
  - with AHAM's proposed text as follows:  
***"These appliances were tested according to new U.S. Government requirements."***

The proposed text more properly informs consumers "why" they should only compare FTC Energy Labels, which have "yellow numbers".

**2.) Effective Date and End Date for Transitional Label for Clothes Washers**

We support FTC's proposed effective date of June 1, 2014 for manufacturers to begin labeling clothes washers with the transitional label under the conditional exemption.

We support FTC's proposal to maintain the transitional label beyond the DOE Minimum Standard effective date of March 7, 2015 for clothes washers, and to maintain the transitional label format until DOE further amends the Clothes Washer Test Procedure, with the exception that the label format would change to add "cost ranges of comparability", once FTC receives product energy data from manufacturers.

**3.) Ranges of Comparability**

We support FTC proposal to eliminate the "cost ranges of comparability" on the transitional label until such time as product energy data is available from manufacturer submissions, and FTC publishes an amendment to the Appliance Labeling Rule. We support FTC's proposed text "**Cost range not available**" and FTC's proposed location in just below the middle of the empty range bar on the transitional label.

**Proposed Amendments Unrelated to the Conditional Exemption****4.) Clothes Washer Capacity**

Alliance Laundry Systems has in the past and we continue to support FTC's proposal to require the FTC Energy Label for Clothes Washers to display the manufacturer's certified U.S. Department of Energy (DOE) capacity in cubic feet, rather than FTC's existing requirement to display the more general descriptors of "standard" or "compact". The impact on Alliance Laundry Systems is minimal to non-existent to meet the proposal, however we can sympathize with competitive manufacturers who may have models that today can be grouped onto a single energy label, and would need to have multiple energy labels to display cubic foot capacity, simply because of different agitator of tub configurations that have no bearing on the annual energy cost descriptor.

We support the FTC proposal to display cubic feet, because it is consistent with the DOE requirements, and avoids any possible confusion by retailers or consumers.

**5.) Rounding to Nearest Cent the National Average Electricity and Natural Gas Cost Figures**

We have no objection to FTC's proposal to round to the nearest cent the national average electricity and natural gas costs used in calculating the estimated annual operating cost of the product.

**6.) Eliminating The Reference to The Cost Rate's "Year".**

We have no objection to FTC's proposal to eliminate the reference on the energy label, to the year that the National Average Electricity and Natural Gas cost were derived by DOE.

**7.) New Comparability Range and Energy Cost Revisions**

- a. We support FTC's proposal to "not alter range and cost information on EnergyGuide labels for Clothes Washers given the upcoming DOE regulatory changes applicable to Clothes Washers, and instead synchronize the range and cost changes with the impending DOE regulations.
- b. We support FTC's proposal to utilize the National Representative Average Unit Costs of Energy as published by DOE in 2012.
  - i. Electricity = 12.00 cents per kWh.
  - ii. Natural Gas = 1.06 dollars per therm

- c. We support FTC's proposed time-table for next revision to range and cost being 2017. We support FTC's existing time-table to update range and cost information not more frequently than every 5-years. We agree that the 5-year schedule strikes a reasonable balance between maintaining consistent disclosures and providing more frequent updates.

Thank you for the opportunity to comment on the proposed amendment.

Respectfully submitted,

Philip J. Manthei  
Sr. Staff Engineer, Agency / Codes Approval

Phone: (920) 748-4486  
FAX: (920) 748-4301  
E-Mail: [phil.manthei@alliancels.com](mailto:phil.manthei@alliancels.com)

Cc: R. Baudhuin, VP Product Engineering  
S. Spiller, VP Chief Legal Officer