



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

March 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 Supplemental 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 (NPR) 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".

The following are our "supplemental" comments being provided in addition our comments dated February 28, 2013.

We are responding the advocate's comments requesting a labeling rule for Clothes Dryers.

ALS Comment:

1. We believe FTC has no direction to label a covered product simply because it uses significant energy. FTC should maintain the existing primary deciding factor of *"Would a consumer make their purchasing decision based on the energy efficiency rating of the model under consideration and its associated location on the Estimated Range of Comparison shown on the energy label?"* We believe that the "range of comparison" for clothes dryers remains very small, just the same as it was 34-years ago in 1979, when FTC made the original decision not to require labels for clothes dryers, because consumer would make their purchase decision based on other factors such as brand or color or aesthetics, when the range of estimated annual energy consumption cost was only \$15/year.
2. The advocates predict imminent adoption by ENERGY STAR of heat-pump clothes dryers in ENERGY STAR's incentive program, which reportedly use one-third less-energy than a standard electric clothes dryer. However we believe that the very high "initial installed cost" of \$879 and extremely long "payback period" of 22-years (per DOE's 4-21-2011 Final Rule for Clothes Dryers, page 22530 at trial standard TSL Level 6), will not sway consumers and achieve a significant market shift, even if that product would get included into the FTC label "range of comparison" and be at the low end of an "expanded" energy consumption range.

Expanded range means, because of the addition of the heat-pump dryer models to the range of comparison.

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

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