



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

August 18, 2014

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: **ALS Public Comments to 16 CFR Part 305 - 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 Supplemental Notice of Proposed Rulemaking (SNOPR) published in the June 18, 2014 *Federal Register* regarding proposed amendments to the Appliance Labeling Rule 16 CFR Part 305.

The following are our public comments:

1. **We generally support our AHAM's comments**, as our industry trade association the Association of Home Appliance Manufacturers (AHAM), regarding covered products of "laundry equipment". Our support or any difference is detailed in the following remaining bullet points, according to the SNOPR subject.
2. **Schedule for Revisions to "Ranges of Estimated Yearly Energy Cost" and Fuel Rates:**
ALS Comment: ALS **supports** FTC's proposal to retain the schedule of "every 5-years" for review and change to the ranges and the fuel rates.
 - a) The proposal maintains certainty for manufacturer's regarding control of obsolescence, scrap costs of the printed labels, and reduced disruption to the manufacturing process.
 - b) The proposal reduces consumer confusion at the marketplace, because more frequent fuel energy rate changes and range changes would allow consumers to see energy labels with differing descriptors on the same model manufactured on different dates.
3. **QR Codes on EnergyGuide Labels:**
ALS Comment: ALS **supports** FTC's decision to NOT PROPOSE or require QR codes on labels.
 - a) ALS has previously commented on May 16, 2012 regarding this issue, and we can only support that retailers have a sign with a QR code linked to the FTC database that would allow consumers with "smart phones" shopping for appliances to quickly see certified ratings and ranges, but we cannot support requiring a QR code on the product EnergyGuide label.

4. More Durable Labels for Clothes Washers:

a) *Adhesive Labels & Hang Tag Labels*

ALS Comment: ALS **supports** FTC's decision to continue to allow both adhesive labels and hang tags.

b) *Hang Tag Attachment Improvement:*

ALS Comment: ALS **opposes** FTC's proposal to require that hang tags be affixed to products using:

- Cable Ties (i.e. "zip ties"),
- Double strings, with reinforced punch holes on the hang tag,
- Material with equivalent or greater strength connected with reinforced punch holes on the hang tag.

ALS **opposes**, because it would add cost, and burden to manufacturers, when the real problem lies with increasing the responsibility of retailers to maintain the presence of the EnergyGuide labels on their showroom displayed products.

c) *Additional adhesive label specifications:*

ALS Comment: ALS **supports** FTC's decision to not propose more specific types of adhesive labels, because it would reduce flexibility and may impose costs.

d) *Smaller-sized Adhesive Labels:*

ALS Comment: ALS **supports** FTC's decision to not propose smaller-sized adhesive labels.

5. Not Limiting Labels to "Display Models":

ALS Comment: ALS **is not fully supportive of** FTC's decision to not propose limiting labels to display models, because the appearance of labels on products which never are displayed on a retail showroom, provide consumers useful energy consumption information after the purchase to help them understand the estimated energy use of their product.

ALS **supports AHAM and objects to FTC's decision** to not address limiting labels to display models. Most printed labels affixed to products never end up on show room floor products, where EPCA law intended consumers to be seeing product energy cost information. FTC needs to do more work with retailers to find a technological solution to providing consumers with required energy cost information for appliances, and remove the burdensome affixing physical labels on all products, when that most appliances never get viewed on retailers showrooms.

6. Not Abandoning "Physical Labels" Altogether:

ALS Comment: ALS **objects** to FTC's decision to not abandon and continue requiring "physical labels" on covered appliances. As ALS stated above in Item #5, FTC needs to do more work with retailers to find a technological solution to providing consumers with required energy cost information for appliances

7. Bilingual Labels:

ALS Comment: ALS **supports** FTC's decision to "not propose" or "require" any language other than English on the EnergyGuide labels. Limited physical space on products and or packaging constrains increasing label-size to accommodate other language text.

8. Clothes Dryer Labels:

ALS Comment: ALS **supports** FTC's decision to not propose requiring labels for clothes dryers at this time, based on the knowledge from *"DOE testing indicates the difference in annual energy costs between the most efficient and least efficient electric models currently available is at most \$11 per year."*

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@alliances.com

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