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March 9, 2009

Mr. Gilbert P. Sperling
Program Manager
Weatherization & Intergovernmental Program
Office of Energy Efficiency & Renewable Energy
U.S. Department of Energy, EE-2K
1000 Independence Avenue, SW
Washington, D.C. 20585-0121

Dear Mr. Sperling:

The Association of Home Appliance Manufacturers (AHAM) and the Retail Industry Leaders Association (RILA) strongly support the quick establishment of the Energy Efficient Appliance Rebate Program to distribute the \$300 million included in the American Recovery and Reinvestment Act of 2009 (Public Law No: 111-5).

AHAM is the trade association representing the manufacturers of major, portable and floor care home appliances, and suppliers to the industry. The home appliance industry is an important factor in the U.S. economy as its product shipments are valued at \$30 billion annually.

The Retail Industry Leaders Association promotes consumer choice and economic freedom through public policy and industry operational excellence. Our members include the largest and fastest growing companies in the retail industry – retailers, product manufacturers and service suppliers – which together account for more than \$1.5 trillion in annual sales. RILA members provide millions of jobs and operate more than 100,000 stores, manufacturing facilities and distribution centers domestically and abroad.

Funding for the Energy Efficient Appliance Rebate Program is important to consumers, retailers and the home appliance manufacturing industry. For consumers, this program will significantly impact homeowners' energy bills. If every household in U.S. upgraded to ENERGY STAR qualified appliances, residents would save more than \$10 billion in utility costs per year. For retailers and the appliance manufacturing industry, it will help drive sales of ENERGY STAR qualified appliances to promote jobs and economic growth on a national basis. This program will further benefit the environment: By replacing home appliances with ENERGY STAR qualified appliances, the U.S. would save more than 82 billion kWh per year.

Attached are principles that we would like to encourage the U.S. Department of Energy to use as it establishes this consumer rebate program. Of paramount importance is the need to distribute this funding simply and quickly to the states for appliances regardless of place of manufacture. Specifically, money should be made available so that the majority of state programs can activate

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in May. The goal for states should be to distribute a majority of these stimulus funds over the 2009 summer months when 2009 energy usage will be highest.

Further, states should be provided the flexibility to implement the details and specifics based on their regional needs.

Thank you for your attention to this matter. This consumer rebate funding will help the economy, reduce utility bills and save energy to benefit the environment.

Sincerely,



Kevin Messner
Vice President, Government Relations
Association of Home Appliance Manufacturers



Faith A. Cristol, Esq.
Vice President, Public Policy
Retail Industry Leaders Association

Energy Efficient Appliance Rebate Essential Principles



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- ✓ Quick and simple
 - It is important to obligate this funding quickly to the States, which is one of purposes of the stimulus package.
- ✓ State's existing program should be acceptable.
 - To increase the simulative effect and speed the obligation of the funding, existing State programs should be deemed acceptable as long as the rebate is for ENERGY STAR qualified appliances.
- ✓ State's new program should be acceptable.
 - States should be encouraged to adopt and expand this beneficial program.
- ✓ States implement details of program.
 - Regional issues and needs vary so States should have flexibility.
- ✓ Allocation of funding to States based on demand and spend-out rate.
 - Incentivize states to implement this program quickly and widely.
- ✓ Working or non-working used appliances should be allowed to be replaced.
 - Proper disposal of appliances yield environmental benefits in addition to the improved operating efficiencies of newer products.
- ✓ No requirement to States to provide rebates for a certain level above ENERGY STAR.
 - States should have the flexibility to implement this program based on their local and regional needs.
- ✓ No requirement for manufacturers or States to contribute to the rebate
 - Defeats purpose of the stimulus.
- ✓ AHAM ENERGY STAR qualified appliances regardless of place of manufacture.
 - Clothes Washers
 - Dehumidifiers
 - Dishwashers
 - Refrigerators & Freezers
 - Room AC
 - Room Air Cleaners
 - Ventilating Fans
 - Battery Charging Systems

*The **Association of Home Appliance Manufacturers (AHAM)** is the trade association representing the manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes 170 members. The home appliance industry is an important factor in the U.S. economy as its product shipments are valued at \$23 billion annually. Our members manufacture products that are in virtually every U.S. household and employ people in the U.S. in 32 states and 158 Congressional districts.*