



October 4, 2010

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program
Mailstop EE-2J
1000 Independence Avenue, SW
Washington, DC 20585-0121

RE: Docket Number EERE-2008-BT-TP-0011 / RIN 1904-AB78: Test Procedure for Microwave Ovens

Dear Ms. Edwards,

This letter constitutes the comments of the American Council for an Energy-Efficient Economy (ACEEE) and the Appliance Standards Awareness Project (ASAP) in response to the Department of Energy (DOE) request for comments on the supplemental notice of proposed rulemaking (SNOPR) for test procedures for microwave ovens and the public meeting held to discuss the document on September 16, 2010. We appreciate the opportunity to provide input into this important process. In our comments below, we address the issues of primary concern to ACEEE and ASAP.

Covered products

We encourage DOE to adopt a broad scope of coverage for this test procedures rulemaking. This will allow the Department to gather energy consumption data for all types of microwave ovens. DOE can address issues of scope and product classes in the standards rulemaking, but these considerations should not affect the scope of coverage for developing test procedures. We therefore support DOE's proposal to cover microwave ovens with or without thermal elements as well as combination microwave ovens.

Settings for standby power measurement

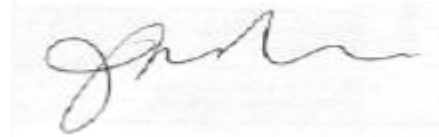
DOE is proposing to test standby power at "factory or 'default' settings." While in general we support harmonization with IEC standards, we are concerned about the potential for gaming using the proposed settings. In particular, we are concerned about the possibility that manufacturers could ship products with settings that use minimal power that consumers could easily switch out of and that therefore these settings would not be representative of typical usage. To prevent any potential gaming, we encourage DOE to require that products be set up for testing with the settings that produce the highest standby power consumption level. This would ensure that products in the field do not consume more standby power than the tested value.

Network mode

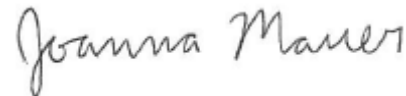
In the test procedures SNOPR, DOE does not propose to include network mode. We are concerned about the potential for a loophole if manufacturers develop products that are always in network mode and that therefore could be considered to have no standby power consumption. In addition, network mode power consumption could potentially be significant, and this additional energy consumption should be included in the test procedures in order to capture the total energy use of microwave ovens in low-power modes. Therefore, we encourage DOE to ensure that the energy consumption of all low-power modes, including standby, off mode, and network mode, is addressed in the test procedures.

Thank you for considering these comments. If you have any questions about these comments, please do not hesitate to contact Jennifer Amann (jamann@aceee.org or 202-507-4015).

Sincerely,

A handwritten signature in black ink, appearing to read "Jennifer Amann", written over a light gray rectangular background.

Jennifer Amann
Director, Buildings Program
American Council for an Energy-Efficient Economy

A handwritten signature in black ink, appearing to read "Joanna Mauer", written in a cursive style.

Joanna Mauer
Technical Advocacy Coordinator
Appliance Standards Awareness Project