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January 8, 2020

Representative Paul Tonko
Chairman
House Energy & Commerce
Environment & Climate Change Subcommittee
2125 Rayburn House Office Building
Washington, DC 20515

Representative John Shimkus
Ranking Member
House Energy & Commerce
Environment & Climate Change Subcommittee
2125 Rayburn House Office Building
Washington, DC 20515

Dear Chairman Tonko, Ranking Member Shimkus and Members of the Subcommittee:

AHAM would like to provide the Subcommittee the views of home appliance manufacturers on H.R. 5544, the "American Innovation and Manufacturing Leadership Act of 2020." AHAM member companies manufacture residential refrigerators, freezers, room/window air conditioners, portable air conditioners and dehumidifiers. All of these products are impacted by H.R. 5544 and the manufacturers of these products have recommendations to improve the current version of the bill. We hope the Subcommittee will agree that the three suggested additions below are reasonable and reflect basic good government tenets.

1. SEC. 4. MONITORING AND REPORTING REQUIREMENTS – Reduce unnecessary and duplicative reporting requirements by ensuring EPA does not impose any more detailed or extensive information submissions than already are required under the existing Clean Air Act regime or to require the reporting of the same information year after year when there are no changes to that information.
2. SEC. 7. TECHNOLOGY TRANSITIONS – Ensure manufacturers have at least three years to redesign and retool its products, as is the case, for example, when a minimum energy standard is changed for home appliances. Changes in requirements under this legislation can have profound effects on product design, as with the energy standards, and require a reasonable lead in period.
3. SEC. 8. RULEMAKING AUTHORITY – Reduce cumulative regulatory burden by EPA coordinating its rulemakings with DOE to try to avoid EPA banning a refrigerant at a different time than an upcoming energy standard change so manufacturers do not have multiple redesigns and retooling changes that are unnecessary. Energy and refrigerant requirements and restrictions are fundamentally linked from an engineering viewpoint.

We look forward to working with the Subcommittee on these issues and appreciate your consideration of our views.

Sincerely,

Kevin Messner
Senior Vice President, Policy & Government Relations