

App J1, Clause 1.7 Energy Test Cycle.

For the Fisher & Paykel IW the Energy Test Cycle is Setting 3 on the 'How Dirty' button. As well as being the midpoint it is where the washer defaults to when turned on.

Other options considered were:

- To test on the highest possible 'How Dirty' setting. Clearly this is unfair as research has shown that about 65% of customers do not change the setting from default. Those that do change it can either increase it or decrease it. Note however changes to this setting only affect motor energy, which is a small percentage of the total energy.
- Testing to the lowest, midpoint and highest setting and then applying relevant usage factors. There is no relevant data on which to provide a basis for any Usage Factors.
- At the end of both J (Section 7) and J1 (Section 6), there is provision for a field test to provide comparative results. Consideration was given to this. However it is very difficult to test an adaptive control washer. Customers take some time to adapt to using the features especially ones that are totally different to those they have used before.

Interim Waiver.

Fisher & Paykel Appliances also requests immediate relief by the granting of an Interim Waiver for washer model IW.

Likely Success of Waiver.

The Petition for Waiver is likely to be granted as Fisher & Paykel Appliances is not seeking to drastically change a test method but merely to confirm the cycle to which the existing test method is applied. We do not feel that this is a particularly radical step and that such innovation must be allowed onto the market.

Economic Hardship.

Fisher & Paykel Appliances currently markets only 1 model of washer in the US. In its major other markets (Australia & New Zealand), many models are marketed, including the local equivalent of the IW. Experience there has proved the sensing technology in the IW is an innovation that provides customers with real benefits.

Fisher & Paykel Appliances needs to introduce a wider model range. Lack of a test method must never be allowed to hinder innovation.

Fisher & Paykel Appliances wishes to maintain its position as an innovator in the top loading clothes washer market and as such needs to keep producing control systems that optimize customer benefits.

Accompanying this application is the User Guide and an interactive CD that are supplied with the equivalent model locally. These will give a good understanding of the product function.



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