

February 6, 2012

Federal Trade Commission
Office of the Secretary
Room H-113 (Annex G)
600 Pennsylvania Avenue, NW
Washington, DC 20580

Regional Labeling for Heating and Cooling Equipment (16 CFR Part 305)
Project No. P114202:

The Air Conditioning Contractors of America (ACCA) submits these comments in response to the Federal Trade Commission's (FTC) Advance Notice of Proposed Rulemaking (ANOPR) on the enforcement regional energy conservation standards for residential furnaces, central air conditioners, and heat pumps

As the leading national trade association representing residential and commercial HVACR contractors for more than 40 years, ACCA serves the nationwide educational, policy, and technical interests of the small businesses who design, install, and maintain indoor environmental systems. Nearly three fourths of ACCA's member companies have fewer than 25 employees, and 92% have fewer than 100 employees.

ACCA has a longstanding history of supporting efforts to encourage energy efficiency in residential and commercial buildings. Every day, thousands of ACCA members across the country help homeowners and building managers realize the comfort, convenience, and cost benefits of high efficiency HVACR equipment.

Label Content, Location, and Format

ACCA supports the use of a map on the Energy Guide label to help anyone handling the box to understand where an appliance may be legally installed. ACCA is aware of the recommended changes to the Energy Guide labels proposed by the Air-Conditioning, Heating, and Refrigeration Institute, (AHRI) in comments submitted to this rulemaking. AHRI's proposal would add several key points of information to the Energy Guide label, including a map showing the various regions and the standard for each region.

The AHRI labeling changes to the FTC Appliance Rule, along with the current practice of providing this information to customers should make clear where a covered product can or cannot be installed. In addition to this requirement, FTC, in coordination with DOE, should create print and broadcast public service announcements, promotional leave behind materials with the DOE or FTC logo, and other information to better inform consumers and contractors of the pending standard changes.

In addition, the label should spell out the names of the states, in alphabetical order, using generally accepted ordering for the District of Columbia, and not abbreviate the state names, even under generally accepted abbreviation formats.