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

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

Ingersoll Rand Residential Solutions, manufacturer of Trane, American Standard, and Ameristar brand residential heating and air conditioning products, appreciates the opportunity to comment on the Federal Trade Commission's Proposed Appliance Labeling Rule that was published in the June 6, 2012 edition of the Federal Register (77 FR 33337).

Ingersoll Rand supports the upcoming regional efficiency standards for residential HVAC equipment, and we believe that adding the regional standards information and additional performance data to the labels as outlined in this proposed rule along with the increased availability of that information throughout the selling process will help to ensure that equipment is installed in the proper region. However, this will be successful only if the final enforcement and labeling rules from DOE and FTC are coordinated with no duplicate reporting required from manufacturers, distributors, and installers. FTC and DOE need to ensure that their final rules do not result in additional labeling requirements or duplicative reporting requirements that would place an undue burden on the industry.

The product categories, label format, and additional information required by the proposed rule are endorsed by Ingersoll Rand, but need improvement in the following four areas:

- The labels should be black on yellow with no additional colors. Adding colors will increase label cost and require some manufacturers to buy new printers. These additional costs were not included in the cost analysis. Adding color will also increase the time lead time required to be ready to start production. The colors can be replaced by solid and cross hatch fill with no loss of effectiveness of communication.
- The EER values on split and packaged central air conditioners need a larger font to be more easily seen and read.
- The final rule should include the option to add a reference to the AHRI Directory of Certified Product Performance instead of the DOE website, since the DOE website is cumbersome and difficult to use.



- The final rule should have the addition of the EnergyStar label as an option and not a requirement. The Energy Star effectivity dates are not synchronized with the NAECA effectivity dates, and the requirements tend to change on relatively short notice.

In finalizing the implementation timing of this new labeling rule, Ingersoll Rand proposes that, rather than setting a specific date, the label rule effective date should be tied to the effective date of regional standards for the affected products. We see this as being necessary due the following issues:

- The actual date for the start of the regional standard is not clear at this time due to a petition from the HVAC industry for a delay and ongoing unresolved legal action by APGA, et al.
- The use of these new labels prior to the implementation of regional standards would cause confusion.

Due to phase in and phase out timing issues, the final rule should not prohibit products with the previous labeling from being installed if they meet-the regional standards.

The following are Ingersoll Rand's comments on other issues on which FTC seeks comment:

- The addition of a QR code on the label should be made optional. The value of adding such a code is small considering that these products are not picked out in a store. The other requirements on availability of label data make the information readily available to the consumer.
- The requirement for adding the label to the packaging needs to include options of being able to view the label on the product through the packaging for example through clear wrap or under a lift-up tab in the box.
- Time to retain labels on manufacturers' websites needs to correspond to the time that the product performance data is available in the AHRI Directory and DOE websites.

Respectfully,

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Chief Engineer