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August 18, 2014

Federal Trade Commission
Office of the Secretary
Washington, D.C. 20580

RE: Supplementary Notice of Proposed Rulemaking on Energy Labeling Rule Regulatory Review (16 CFR Part 305) (Project No. R611004).

The Air-Conditioning, Heating, and Refrigeration Institute (AHRI) is the trade association representing manufacturers of air conditioning, space heating, water heating and commercial refrigeration equipment. AHRI's 315 member companies include all the major manufacturers of residential heating, air-conditioning and water heating equipment doing business in the U.S. We submit the following comments in response to the Supplemental Notice of Proposed Rulemaking (NOPR) issued in the June 18, 2014, Federal Register.

The resolution of the situation regarding the Department of Energy's implementation of regional standards for non-weatherized and mobile home gas furnaces and central air conditioners now allows several matters regarding the EnergyGuide labels for the various types of furnaces, including boilers, central air conditioners and heat pumps to be addressed. Although the SNOPR addresses only some of these issues, we are taking this opportunity to provide comments on all the issues which we believe require resolution.

Online Label database

AHRI supports an online label database and the use of electronic labels in lieu of paper. In fact, AHRI has already implemented an electronic label in its online Directory of Certified products for residential furnaces, boilers, water heaters, central air conditioners and heat pumps. However, in the event that FTC decides to implement electronic labels on the CCMS database, we ask that FTC not limit the uploading of labels through URL links only. Currently, AHRI uses PDF files to depict the label on its online Directory, and we request that FTC allow the uploading of labels through PDF files (and possibly other formats) in addition to URL links.

Ranges of Comparability for Furnaces and Boilers

New DOE minimum standards for residential boilers have been implemented. These new standards reset the low end of the range of comparability for these products. Accordingly revised ranges of comparability should be specified as follows:

PRODUCT TYPE	MINIMUM AFUE, %	MAXIMUM AFUE, %
Gas Boiler - Hot Water	82.0	96.3
Gas Boiler – Steam	81.0	83.4
Oil Boiler - Hot Water	84.0	91.2
Oil Boiler – Steam	82.0	86.0

Capacity and Basic Model Number Information

We agree with FTC's decision to eliminate the capacity information from the EnergyGuide labels for heating and cooling equipment. We note that in the actual text of the SNOPR this change is made only in 305.12 (f) "Contents of labels for furnaces." A similar change is needed for air conditioners and heat pumps. We also appreciate the clarification at the top of page 34653 that manufacturers may print multiple model numbers on the EnergyGuide labels for models sharing the same efficiency ratings.

Compliance Date for Residential Boilers, Weatherized Gas Furnaces and Oil-fired Furnaces

The SNOPR specifies an effective date of November 1, 2014 for revised labels for boilers and oil furnaces and an effective date of January 1, 2015 for revised labels for gas furnaces, weatherized and non-weatherized. Given the close proximity of these two dates, we suggest that it may be simpler to specify January 1, 2015 as the effective date for the revised labels for all these products.

Sample Labels

To make sure that the revised EnergyGuide label specifications are understood, we request that the final rule resulting from this process include sample labels for residential gas and oil boilers and for weatherized gas furnaces.

Label for Packaged Heating and Cooling Products

This comment raises a new issue. Many weatherized residential furnaces are manufactured and sold as part of a packaged air conditioning and heating product, often referred to as a packaged rooftop system. Traditionally these products consisted of an air conditioner and gas furnace. Currently some packaged units are heat pumps combined with a gas furnace. In either case, when both the cooling component and the gas furnace are residential products, as defined by DOE regulations, the packaged unit must bear the appropriate EnergyGuide labels. Recognizing that this product is a single unit, we request that the labeling rules be amended to allow manufacturers to combine the gas furnace information and the air conditioner or heat pump information, as applicable, into a single EnergyGuide label. This concept already exists for the residential heat pump label which provides both cooling efficiency and heating efficiency rating information. The basic structure of that label could be applied to the packaged unit that has an air conditioner or heat pump and gas furnace. Attached are two samples illustrating how this combined label would look. In considering this request, please recognize that the gas furnaces provided with these packaged products are weatherized furnaces which simplifies the content of the combined label.

We appreciate the opportunity to comment on this SNOPR. If you have any questions or require additional information, please contact us

Respectively Submitted,

Frank A. Stanonik
Chief Technical Advisor

Attachment: Exhibit A

U. S. Government

Federal law prohibits removal of this label before consumer purchase.

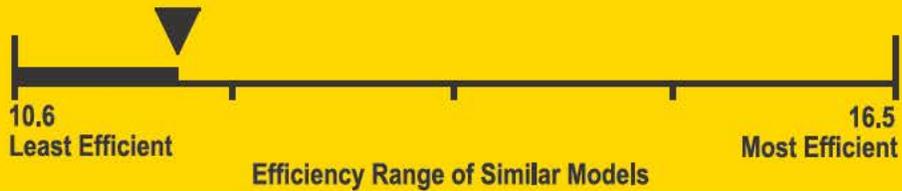
ENERGYGUIDE

Central Air Conditioner Cooling
Gas Heating System
Single Package

Company Name
Model Number

Seasonal Energy Efficiency Ratio

13.3



Annual Fuel Utilization Efficiency

82.7



- Efficiency range based only on Single Package units.
- For more information, visit www.ftc.gov/appliances.

U. S. Government

Federal law prohibits removal of this label before consumer purchase.

ENERGYGUIDE

Heat Pump
Cooling and Heating
Gas Heating System
Single Package

Company Name
Model Number



Seasonal Energy Efficiency Ratio

15.5



Heating Seasonal Performance Factor

7.7



Annual Fuel Utilization Efficiency

82.7



- Efficiency range based only on Single Package units.
- For more information, visit www.ftc.gov/appliances.