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August 6, 2012

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

RE: AHRI comments – Appliance Labeling Rule (16 CFR Part 305) (Project No. P114202)

Dear FTC Staff:

The following comments are submitted by Rheem Manufacturing Company in response to the FTC's proposed Appliance Labeling Rule appearing the Federal Register on June 6, 2012.

Rheem is an industry leader for total heating, cooling, and water heating solutions, and one of the few global brands with product offerings covering residential and commercial heating, cooling, conventional and hybrid storage water heaters, tankless water heaters, solar water heating systems, pool and spa heaters, commercial boilers, residential hydronic and geothermal systems, indoor air quality accessories, and replaces parts for all categories. Rheem is headquartered in Atlanta, Georgia and manufactures in Fort Smith, Arkansas; Montgomery, Alabama; Oxnard, California, and Eagan, Minnesota. All manufacturing facilities are ISO 9001 certified. Rheem operates a state-of-the-art parts distribution center in Randleman, NC and distribution facilities throughout the US, Canada, and many other countries around the world.

Rheem is a member of the Air Conditioning Heating and Refrigeration Institute (AHRI) and supports all the comments filed by AHRI, and adds the following additional remarks.

Rheem opposes the proposed four-color printing to indicate the regional standards. Today's printing is done with a black ink only printer, on recognizable yellow stock paper as specified in the current Appliance Labeling Rule. This label is consistent between many appliances. Rheem advocates that the current yellow stock paper and process blank ink be continued and the various regions be segmented by either shades of gray or various patterns/hatch marks. Switching to a color printer for all affected manufacturing facilities will be costly as will the consumables associated with a color printing, e.g. color ink.

Rheem does not support the proposed duplicative EnergyGuide label on the carton. The EnergyGuide label is to disclose product efficiency and potential operating cost information to the consumer, and as in the case of this proposal, to show the approved region where the respective product can be



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installed. However, since the product packaging for HVAC products, is rarely seen by the consumer, this requirement will provide little to no value, and will further escalate the cost impact to Rheem.

Rheem appreciates the opportunity to provide these comments. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

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