



April 24, 2012

Federal Trade Commission
Office of the Secretary
Room H-135 (Annex A)
600 Pennsylvania Avenue NW
Washington, DC 20580

Re: Appliance Labeling Amendments, Matter No. R611004

To whom it may concern:

On behalf of Bradford White Corporation (BWC), I would like to express our appreciation for the opportunity to comment on the Appliance Labeling Amendments. Please find our comments below.

BWC agrees with using the same report content for both FTC and DOE. However, it is important that manufacturers must be able to submit their certification reports to the DOE's Compliance and Certification Management System (CCMS) database through voluntary industry certification programs (VICPs), such as AHRI. This will help in reducing the reporting burden on manufacturers.

BWC does not agree with requiring quick response (QR) codes on the EnergyGuide labels. These labels already have a considerable amount of content on them, and by adding more, consumers will be further inundated. Also, the websites linked to these codes must then be kept up to date with the latest product information, which will add further administrative burden.

Bradford White Corporation thanks you for this opportunity to comment on the Appliance Labeling Amendments.

Respectfully Submitted,

Bradford White Corporation

Michael W. Gordon
Senior Vice President, Engineering

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