

Mr. Newsome

My name is Jeff Wishek and I work for Fanimation, a US based Ceiling Fan manufacturer. We have been asked to share and comment from a manufacturer's perspective our thoughts on current and future regulations. We appreciate the opportunity to share our thoughts and have given careful consideration on what to suggest moving forward. Fanimation believes its competitors (Fellow Ceiling Fan Manufacturers) also share our concerns regarding what we would like moving forward.

1. 190W Limiter should not be a blanket requirement as some light kits are self limiting. An example of a self limiting light kit would be one that has 3 60W Candelabra's. In no circumstance will this light kit go above the 190W restriction because of the socket size and number of lamps.
2. Limiters increase product costs significantly
3. Increasing the costs of ceiling fans, devices that reduce overall energy consumption, is reducing their use and therefore increasing energy consumption.
4. Compliance testing is very expensive and is passed on to consumers as manufacturers are not able to absorb the cost.
5. Is the 190W Limiter just an interpretation of the DOE or is it LAW?
6. The formula for the FTC Label requirement should be calculated at 1 hour and \$.10 per KWH or at minimum should match the lighting fixtures formula.
7. The FTC label estimates costs to run the product; we should add a figure that illustrates costs saved when using a ceiling fan.
8. In an effort to reduce customer confusion, merge the FTC and CEC labels as they accomplish the same objectives.