



UNITED STATES OF AMERICA
FEDERAL TRADE COMMISSION
WASHINGTON, D.C. 20580

Bureau of Consumer Protection
Division of Enforcement
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December 24, 2014

Karim Amrane
Senior Vice President, Regulatory & International Policy
Air-Conditioning, Heating, and Refrigeration Institute
2111 Wilson Boulevard, Suite 500
Arlington, VA 22201-3001

Dear Mr. Amrane:

This staff opinion letter responds to your recent request for a short delay of three months for manufacturers to comply with the new central air conditioner label requirements. These requirements take effect on January 1, 2015.¹ You explained that certain manufacturers need the extra time in order to adhere to the new requirements. Because, in staff's opinion, this short delay will cause little harm, we would not recommend enforcement action for manufacturers that do not meet the January 1 deadline as long they continue to use the existing label and comply with the new labeling requirements by April 1, 2015. As you are aware, the Department of Energy ("DOE") is developing new enforcement rules for its regional efficiency standards.² These new DOE enforcement rules may necessitate changes to the information on the EnergyGuide labels for central air conditioners. FTC staff will consider further guidance or potential rule amendment recommendations as these issues develop.

The views expressed in this letter are those of FTC staff assigned to enforce the Commission's Energy Labeling Rule (16 C.F.R. Part 305). In accordance with Section 1.3(c) of the Commission's Rules of Practice and Procedure, 16 C.F.R. § 1.3(c), this is a staff opinion only and has not been approved by the Commission or by any individual Commissioner. The advice provided in this letter is not binding upon the Commission and is given without prejudice to the right of the Commission later to rescind the advice and, when appropriate, to commence an enforcement proceeding. In conformance with Section 1.4 of the Commission's Rules of

¹ See 78 Fed. Reg. 8362 (Feb. 6, 2013) (final rule for regional standards labels); and 79 Fed. Reg. 52549 (Sept. 4, 2014) (updated ranges for central air conditioners).

² See 79 Fed. Reg. 45731 (Aug. 6, 2014).

Practice, 16 C.F.R. § 1.4, this letter is being placed on the public record. If you have any further questions, please contact me at (202) 326-2889.

Sincerely,

A handwritten signature in blue ink, appearing to read "Hampton Newsome", with a long horizontal flourish extending to the right.

Hampton Newsome
Attorney