



July 18, 2014

Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue
NW, Room CC-5610 (Annex B)
Washington, DC 20580

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

Dear Commission:

Plumbing Manufacturers International (PMI) appreciates this opportunity to provide comments to the Federal Trade Commission. PMI is an international, U.S.-based trade association representing 90% of U. S. plumbing products sold in the United States. It has made the promotion of water efficiency and safety a top priority and has included it in its mission statement¹. PMI's members are industry leaders in producing safe, reliable and innovative water efficient plumbing technologies and have supported water efficiency legislation, as well as the voluntary US EPA WaterSense program.

PMI's proposed comment in regards to the proposed rulemaking, as underlined, is as follows:

§ 305.20 Paper catalogs and Web sites. (a)(ii) Products not required to bear EnergyGuide or Lighting Facts labels. All Web sites advertising covered showerheads, faucets, water closets, urinals, general service fluorescent lamps, fluorescent lamp ballasts, and metal halide lamp fixtures must include the following disclosures for each covered product. For plumbing products, the Web site may hyperlink to the disclosures using a prominent link labeled "Water Usage", "Water Consumption", "Flow Rate", "Product Description" or similar description which facilitates the disclosure of the covered product's rated water usage.

PMI believes that the additional terminology would afford language flexibility for manufacturers and other sellers when marketing different products. Additionally, the extra terminology would accommodate existing website configurations while still providing the required information to the consumer and complying with the labeling intent.

In closing, PMI would like to thank the Federal Trade Commission for the opportunity to provide comments in regards to the proposed rulemaking.

¹PMI's Mission: To promote the water efficiency, health, safety, quality and environmental sustainability of plumbing products while maximizing consumer choice and value in a fair and open marketplace. To provide a forum for the exchange of information and industry education. To represent openly the members' interests and advocate for sound environmental and public health policies in the regulatory/legislative processes. To enhance the plumbing industry's growth and expansion.

Sincerely,

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PMI MEMBERS INCLUDE:

*American Standard Brands, Inc. *Bradley Corporation *BrassCraft Mfg. Co. *Chase Brass & Copper Company *CSA International
*Delta Faucet Company *Dornbracht Americas *Duravit USA *Fisher Manufacturing Company *Fluidmaster, Inc. *Hansgrohe, Inc. *HOLDRITE
*InSinkErator *International Association of Plumbing and Mechanical Officials *International Code Council Evaluation Service *Kohler Company
*KWC America, Inc. *Lavelle Industries *LSP Products *Moen Incorporated *Mueller Brass Company *NEOPERL, Inc. *NSF International *Pfister
*Reed Construction Data *Sloan Valve Company *Speakman Company *Symmons Industries Inc. *T & S Brass and Bronze Works, Inc. *TOTO USA
*VitrA USA *Water Pik *WCM Industries, Inc.

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