



5 January 2016

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

RE: Energy Labeling Amendments (16 CFR part 305) (Project No. R611004)

Dear Mr. Newsome:

On behalf of NSF International, I would like provide comments to the Federal Trade Commission (FTC) in regards to the Energy Labeling Amendments (16 CFR part 305).

NSF International was founded in 1944 and is committed to protecting and improving human health and the environment on a global scale. NSF international is an independent organization that provides standards development, product certification, testing, auditing, education and risk management for the public health and the environment. NSF International supports and is actively engaged in initiatives which strive for energy efficiency and water conservation.

In regards to the proposed plumbing ASME reference updates, NSF International recommends that ASME product standard marking requirements for showerheads and faucets (A112.18.1), as well as water closets and urinals (A112.19.2), be removed from 16 CFR part 305 for the following reasons:

- This reference is redundant as all plumbing codes require manufacturers to third-party certify their products to the current applicable standard, such as ASME A112.18.1/CSA B125.1 (2012) and ASME A112.19.2/CSA B45.1 (2013). This certification requires testing to all applicable product standard requirements including water usage. The certifier's mark, which is required, indicates that the product meets the requirements of applicable standard. Additionally, certifiers maintain public listings on their website which allows verification of product compliance.

- The ASME A112.18.1 and ASME A112.19.2 markings have no effect on the performance of products being sold as they must be in compliance with the latest revision of the standards. This marking is irrelevant to the consumer. The consumer is concerned with the water usage which currently is found on the product and packaging as required by 16 CFR part 305.
- The correct designation of the current standards are ASME A112.18.1/CSA B125.1 and ASME A112.19.2/CSA B45.1. These are rather long and can be problematic on some product where the available surfaces for marking is small. The font size would have to be reduced to a point that it would be difficult to read. Having the manufacturer's mark and the certification mark is sufficient. With this information and the model no. the applicability of the standard can easily be found in the public listing of the certifying organization.

I would like to thank the FTC for the opportunity to provide comments for the proposed Energy Labeling Amendments (16 CFR part 305). I respectfully requests that the FTC consider my comments to the proposed rulemaking.

Regards,



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