

January 8, 2016

Mr. Hampton Newsome, Attorney
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)

This letter is providing comments from Lochinvar, LLC. in response to the Federal Trade Commission (FTC) notice of proposed rulemaking (NOPR) regarding Energy Labeling appearing in the Federal Register on November 2, 2015.

Lochinvar, LLC, headquartered in the Nashville, Tennessee area, is a leading manufacturer of residential and commercial high efficiency boilers, water heaters and pool heaters. Lochinvar has been in the business of manufacturing boilers and related products since 1939 and became a wholly owned subsidiary of A. O. Smith Corporation in 2011.

Our comments pertain only to the Online Label Database.

We support the FTC's proposed revisions to 10 CFR Part 305.6. As long as the FTC rules allow manufacturers to provide a link to the Web site where the EnergyGuide label is available rather than requiring a specific link to an individual EnergyGuide label the proposed rule will not impose a significant burden on manufacturers. It is important that the FTC continues to allow manufacturers and trade associations flexibility in the method of generating and maintaining the online EnergyGuide labels as long as they are readily available to consumers.

The sentence in 305.6 (b) is incomplete and should be edited. I believe the intended wording should be, "(b) Manufacturers must submit the Web site address for the online labels covered by paragraph 305.6 (a)."

Lochinvar, LLC. appreciates the opportunity to provide these comments. If you have any questions regarding this submission, please do not hesitate to contact me.

Regards,

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