



January 11, 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)

To whom it may concern:

On behalf of Bradford White Corporation (BWC), thank you for the opportunity to comment on the Energy Labeling Amendments. Please find our comments below as this Notice of Proposed Rulemaking relates to water heaters.

BWC agrees that the Federal Trade Commission (FTC) should modify water heater labels in response to the new DOE test procedure (79 FR 40541). While we agree that the label needs to be modified, there are a number of items on the proposed label we feel will present unnecessary confusion to terminology that has been previously established by the Department of Energy (DOE). For example:

- The phrase “hourly hot water output” is used. We feel this is somewhat of a misrepresentation between what a water heater’s recovery per hour is versus the First Hour Rating. BWC recommends this terminology be maintained as “First Hour Rating.” This also eliminates the need to have the note near the bottom of the label stating “\*Also known as First Hour Rating.”
  - We also feel it is important to note that codes, such as the Uniform Plumbing Code (UPC), commonly use the term First Hour Rating.
- The terminology of “Tank Size” should be removed to stay consistent with the current label. The tank’s capacity is noted on the water heater’s rating plate.
- The names of the draw bins do not match DOE’s terminology and should be changed to match.

In addition, BWC feels it is unnecessary to include estimated yearly energy use on the label (i.e. therms in the example label). This can be easily calculated from the estimated yearly energy cost and national average fuel cost, and in the end, a consumer cares most about how much they will pay annually (estimated).

BWC supports combining categories for electric resistance and heat pump water heaters. We support splitting the comparability ranges by draw bin only, as this would allow a consumer to appropriately compare water heaters that are providing a similar utility.

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We request that the bullet point, from AHRI's recommended Energy Guide label, "This water heater should only be compared to models in the Medium Usage category," should be added. BWC also recommends that the definition for First Hour Rating is included on the label, as we believe this helps a consumer understand how the rating is attained.

Bradford White Corporation thanks you for this opportunity to comment on the Notice of Proposed Rulemaking for Energy Labeling Amendments. We have coordinated our response with AHRI.

Respectfully Submitted,

Bradford White Corporation

Eric Truskoski  
Director of Government and Regulatory Affairs

Cc: B. Carnevale; E. Lannes; M. Taylor; B. Hill; C. Sanborn; F. Stanonik;

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