



November 12, 2016

VIA FTC ONLINE COMMENT SUBMISSION

Hampton Newsome
Attorney, Division of Enforcement
Federal Trade Commission
Office of the Secretary
600 Pennsylvania Avenue NW
Suite CC-5610
Washington, DC 20580

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

Dear Mr. Newsome:

Hunter appreciates the opportunity to provide comments on the Energy Labeling Amendments that substantially affect Hunter and the consumers we serve.

Packaging

Hunter does not believe EnergyGuide labels are necessary on product packaging for large-diameter fans. Based on the size of these fans, and the associated extra-large packaging, Hunter does not foresee any meaningful amount of retailers displaying these fans to consumers prior to the purchasing decision. Consequently, consumers will only see the packaging for a large-diameter fan after the purchasing decision when the product is delivered.

Website

Consumers may find EnergyGuide labels useful on websites prior to the purchasing decision. However, as the Commission highlights there likely will be confusion to consumers if the large-diameter fan labels match the labels for small-diameter fans. Confusion is more likely when consumers are contemplating purchasing fans at sizes near the boundary of small and large diameter fans (e.g. large-diameter fans just above 84" and small-diameter fans just below 84"). There are many commercial establishments where either a large small-diameter fan could be used or a small large-diameter fan.

Hunter believes any label for large-diameter fans should highlight that the label is for large-diameter fans as well as indicate that the label should only be compared to other large-diameter fans, not small-diameter fans.



Hunter is more than happy to have a further discussion on this subject matter. Thank you for your time and consideration.

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