



November 7, 2016

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

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

Secretary Clark and Commissioners,

Delta T Corporation, dba Big Ass Solutions (BAS), agrees with the Federal Trade Commission's (FTC) assessment that requiring a label for large-diameter ceiling fans under 16 CFR part 305 will create little to no benefit for the consumer while adding additional burden and cost for the manufacturer.

Unlike most labels, which compare the efficiency of similar products, the proposed requirement would encourage comparison of small-diameter and large-diameter fans, which have vastly different applications. Given that the hours of use for large-diameter fans are nearly double those of small-diameter fans that are required to carry a label, and that the estimated hours of use used by the Department of Energy (DOE) are not based on a citable source or study, it would be difficult for a consumer to determine why energy consumption may vary greatly across different products that appear to have similar energy consumption. It may also lead a consumer to purchase multiple small-diameter fans with the intent to save energy when, realistically, one large-diameter fan would likely provide similar or greater utility while consuming far less energy.

Additionally, as the DOE noted in its analysis of the market, large-diameter fans are typically sold directly to consumers or via distributors,¹ not to individual consumers through a retail outlet or e-commerce site where the label would be required to be on display. As such, the requirement of the label would provide no benefit to the end user while adding additional burden and cost for the manufacturer.

Should the FTC decide to reverse its position and require a label for large-diameter fans, BAS recommends to the DOE that integrated efficiency, maximum power consumption, and maximum cubic feet per minute of airflow all be included as relevant information for the consumer. Any comparison of yearly cost of energy to similar models should be done based on fans that provide similar utility and not between a large-diameter fan and a small-diameter or lower volume fan.

BAS appreciates the opportunity to submit these comments regarding energy labeling requirements for large-diameter fans (16 CFR part 305)(Project No. 611004). We are happy to answer any questions you may have.

Sincerely,

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Patrick Keal
Government Affairs Director

¹ It should be noted as well that large-diameter fans are installed almost exclusively in commercial or industrial buildings, and not in residences.