



KENWOOD BRAUN

November 14, 2016

Via Online Comment Portal

Mr. Hampton Newsome
Attorney
Division of Enforcement, Bureau of Consumer Protection
Federal Trade Commission
600 Pennsylvania Ave., NW
Washington, D.C. 20580

Subject: De' Longhi Group comments on Energy Labeling Amendments (16 CFR Part 305) (Project No. R611004)

Dear Mr. Newsome,

De' Longhi respectfully submits the following comments to the Federal Trade Commission. De' Longhi is a manufacturer of household appliances which has been producing portable air conditioners for more than 25 years and we support a reasonable FTC Energy Labelling Rule for portable air conditioners (PAC).

De' Longhi participated in the development of AHAM's comments and incorporates those comments in these comments as well.

We would like to stress in particular the following points.

Combining range categories for PACs and RACs

PACs represent a very specific market segment that meets specific consumer needs. In particular:

1. They are a unique solution for consumer needs, such as where installation of other categories air conditioners is forbidden or impracticable, for example, in rental situations. They do not have an impact on the external part of the building, because they do not need an external unit or a portion of a unit extending outdoors.
2. They do not need installation or preliminary set up (which is required for RACs). They can provide an effective cooling just after the purchase as they are "plug and play".
3. The small dimension and the design of PACs allow the user to get comfort only in the area where this is needed, moving the equipment from room to room or from dwelling to dwelling. This allows also a significant energy consumption reduction because no room is conditioned without necessity.

According to an AHAM survey conducted in 2016 by the Stevenson Company, PAC and RAC owner profiles have substantial differences:

- Portability: PAC purchasing is most often related to portability and inability of a RAC to fit their window.
- Region: Geographical distribution of PACs and RACs users is very different.
- Household income: PAC owners are more likely to have higher incomes.



KENWOOD BRAUN

- Supplementary cooling: for PACs owners is more common to have central AC and use PACs as supplementary cooling.

In addition, according to DOE data, the average yearly usage of PACs in cooling mode (the only one for which DOE issued a test procedure) is lower than for RACs. This usage difference makes also meaningless to use a common frame for estimating the annual operating cost.

For all these reasons we oppose the Commission's proposal to combine range categories for PACs and RACs; each type has its own unique key purchase drivers and consumers do not compare the two product categories.

Timing

We ask the Commission to require reporting and labelling only when compliance with Federal energy conservation standards is required.

Figures to be displayed on the label

The figures to be displayed on the label shall be consistent with those specified in the DOE test procedure, Appendix CC to Subpart B of Part 430.

Respectfully Submitted,

Alberto Aloisi
Group Product Compliance and Regulatory Affairs Manager
De' Longhi Appliances s.r.l.