



October 18, 2006

The Home Depot Comments on FTC Ceiling Fan Appliance Labeling Rule

Re: Matter R611018 -- Proposed Labeling Requirements for Ceiling Fans

The Home Depot is the leading retailer in the United States of ceiling fans and related light kits. We appreciate this opportunity to comment on the proposed labeling rules for ceiling fans. The Home Depot believes that the FTC has done an excellent job in developing this proposal, and we are generally supportive.

We support the content and structure of the label although more information is required about the background and nomenclature colors. Specifically, for simplicity we support disclosing only the high-speed mode.

The Home Depot also supports the range approach that is proposed. With respect to question "F" -- whether similar size fans have similar air-flow ratings, we believe that test data should be gathered and reviewed at approximately 120 days prior to implementation and then a suitable range may be selected.

It makes sense to keep the labels simple and streamlined and not add cost of operation or other data which will only be confusing and not provide a good basis for comparison. We are disappointed that the label may not be printed bilingual since we think it is important to communicate to our Hispanic customers, but we understand that such information can be provided off-label. It also is sensible that the label be printed on the packaging, and not the product, which is far less burdensome to manufacturers and more useful to consumers.

We have issue with the likely gross underestimate of the cost and burdens of reporting requirements. We understand that the American Lighting Association is providing more data on this matter, and we would urge the Commission to revise its estimates accordingly. Although we are supportive of the energy legislation and this proposed rule, we think it is important that the public appreciate the true burdens and costs of regulations.

Also, we understand that the ALA will present information about some unusual fan designs that may not be suitable for the test procedure. We urge the Commission to consider exemptions or other appropriate action with respect to these products.

It also is important that the agency provide clarification of the specific obligations manufacturers and retailers have with respect to printing this energy information in hard copy and on line retail catalogs, websites and price sheets.

Thank you for your consideration.

Respectfully submitted,

Kent Knutson
Vice President, Government Relations
The Home Depot

Of Counsel:
Charles Samuels
Mintz, Levin, Cohn, Ferris, Glovsky and Popeo
701 Pennsylvania Avenue, N.W.
Washington, D.C. 20004
Phone: 202-434-7311
Fax: 202-434-7400
Email: casamuels@mintz.com