



SINCE 1886

August 28, 2006

Mr. Hampton Newsome
Federal Trade Commission
Office of the Secretary
Room H-135 (Annex J)
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: FTC Proposed Labeling Requirements

Dear Mr. Newsome,

The Hunter Fan Company appreciates the work done on the part of the FTC to clarify the specific language and requirements of the federal label as required by EPA Act 2005. We have reviewed the proposed requirements relative to ceiling fans. Based on this review, we offer the following comments.

B. Operating Costs and Energy Disclosures

Relative to the labeling requirements, the FTC has proposed to use three descriptors to adequately convey the factors that should be considered when making a ceiling fan purchase. We agree that all three descriptors are required to provide consumers with the necessary information to make an informed purchase. We also believe it will be intuitive for a consumer to understand that as long as the ceiling fan has a high CFM/Watt rating, then the fan will be more efficient on whichever speed is used. The total CFM rating is still necessary to indicate that ceiling fan provides sufficient air movement for large rooms. We agree that showing total wattage used on high speed is a good general comparison tool for consumers to understand the electricity used relative to other devices in the home.

D. Additional Performance Information

Hunter Fan agrees that the labeling requirements should be restricted to the information as stated in section B. Additional performance information on the label would have the potential to confuse consumers. We also agree that it would be beneficial to manufacturers to have the option of providing additional energy information such as wattage use for medium and low speed elsewhere on the fan package.

F. Location of the Label

Hunter Fan believes it is appropriate to require the label on the fan package as opposed to the product. Consumers would not have the option of reading this information in retail stores if the label is positioned on the product as they are typically suspended from an overhead structure and positioned on average eight to nine feet off the floor. It would be much easier for consumers to obtain this information by having it placed on the fan packaging.

We appreciate having this opportunity to comment on the DOE proposed rule making. Thank you for allowing us this opportunity. If there are any questions regarding these comments or clarification would be helpful I would be available to come to Washington DC to meet with you and your colleagues or to respond to specific inquiries in writing.

Sincerely,

Brendan Byrne
Hunter Fan Company