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February 18, 2015

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program, Mailstop EE-2J
1000 Independence Avenue SW
Washington, DC 20585

Re: Energy Conservation Standards for Small, Large, and Very Large Air-Cooled Commercial Package Air Conditioning and Heating Equipment [Docket Number EERE-2013-BT-STD-0007]

Dear Ms. Edwards:

Due to recent manufacturer comments, AHRI would like to retract the comment it made about the classification of dual-duct air conditioners. In our comments dated December 22, 2015, we stated that we did not believe that a separate equipment class should be established for dual-duct air conditioners as these products are not a significant part of the market and can be treated within the current standard.

It should be clarified that dual-duct air conditioners and double-duct air conditioners are not the same type of equipment. Double-duct units utilize duct work on both the evaporator and condenser side of the unit. A dual-duct system incorporates two duct work systems, one used for cooling and the other for heating. In the notice of proposed rulemaking, DOE began by describing double-duct units, but then switched the description to dual-duct units later in the rulemaking. AHRI would like to retract the comment submitted and encourages DOE to contact manufacturers who produce this type of equipment for additional information.

AHRI appreciates the opportunity to provide this clarification on a previous comment. If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

A handwritten signature in black ink, appearing to read "Nick Mislak", written in a cursive style.

Nick Mislak
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