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2111 Wilson Boulevard Suite 500 Arlington VA 22201-3001 USA
Phone 703 524 8800 | Fax 703 562 1942
www.ahrinet.org

July 20, 2015

Ms. Ashley Armstrong
Office of Energy Efficiency and Renewable Energy
Building Technologies Program
Room EE-5B
U.S. Department of Energy
1000 Independence Avenue, S.W.
Washington, D.C. 20585-0121

Re: Request for Extension of Comment Period in Response to Department of Energy's (DOE) Notice of Data Availability (NODA) for Energy Conservation Standards for Commercial and Industrial Fans and Blowers [*Docket Number EERE-2013-BT-STD-0006*]

Dear Ms. Armstrong:

On behalf of the Air-Conditioning, Heating, and Refrigeration Institute (AHRI) members, we respectfully request that the U.S. Department of Energy (DOE) extend the public comment period for an additional 60 days on the agency's request for comments on the notice of data availability (NODA) regarding energy conservation standards for commercial and industrial fans and blowers appearing in the *Federal Register* on May 1, 2015. The comment period is currently set to close on August 1, 2015.

Our members have been spending a considerable amount of time participating in the ongoing negotiated rulemaking working group under the Appliance Standards and Rulemaking Federal Advisory Committee (ASRAC) in accordance with the Federal Advisory Committee Act (FACA) and the Negotiated Rulemaking Act (NRA) to negotiate definitions, certain test procedure provisions (as applicable), proposed energy conservation standards (including scope of the applicable standards), and specific certification/labeling provisions as necessary to implement the regulatory approach for commercial and industrial fans and blowers. With a Working Group deadline of August 6, 2015, the NODA comment deadline is particularly ill timed. Extending the comment period will allow AHRI members to focus on participating in the ongoing negotiated rulemaking.

Further, we would not want to provide comments on any subject while still forming opinions while participating in the working group.

AHRI is the trade association representing manufacturers of heating, cooling, water heating, and commercial refrigeration equipment. More than 300 members strong, AHRI is an internationally recognized advocate for the industry, and develops standards for and certifies the performance of many of the products manufactured by our members. In North America, the annual output of the HVACR industry is worth more than \$20 billion. In the United States alone, our members employ approximately 130,000 people, and support some 800,000 dealers, contractors, and technicians

Thank you for the review of AHRI's request for an extension of the comment period on this NODA. 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 'LPG' with a stylized flourish.

Laura Petrillo-Groh, PE
Engineering Manager, Regulatory Affairs
Direct: (703) 600-0335
Email: LPetrillo-Groh@ahrinet.org