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Abigail Daken
U.S. EPA
ENERGY STAR® Program
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Dear Ms. Daken:

Ingersoll Rand Residential Solutions, manufacturer of Trane and American Standard residential heating and air conditioning products, appreciates the opportunity to comment on the Environmental Protection Agency's Energy Star® Program requirements for Residential Climate Controls. The comments below highlight some of the key concerns found in the attached comment list regarding the Energy Star® Program Requirements for Residential Climate Controls, Version 1.0, Draft 3. Some of the key concerns include remote management of climate controls, the application program interface (API), maintaining correct date, time and daylight savings time without user input and the energy savings mode set points.

Climate controls should be self-contained and provide all the necessary control, display and reporting functions. Control functions should be capable of autonomous operation in response to settings and be locally or remotely settable or controlled. The capability to be remotely programmed, as in a supervisory control, does not override the need to be locally programmable, and the remote instructions shall be capable of being overridden locally.

The application program interface should include only the minimum set of code required to access and control the minimum set of prescribed measures of performance. Manufacturers may choose to incorporate additional features employing proprietary code for which there is no legitimate need by others. Use of API's to remotely monitor programmable settings, schedules, system modes, fan modes and installer settings by anyone other than the owner/occupant is unreasonably intrusive.

Maintenance of the correct date and time without user input is dependent upon a connection with the internet.

The temperature limits prescribed for the Energy Savings Mode are severe enough to discourage use of setback and setup. If the system were to remain in the Energy Saving Mode for extended periods in moderately temperate weather, that could inhibit cooling or heating for several days, resulting in indoor environmental conditions favorable to mold.

Ingersoll Rand hopes that the attached comments can be constructive toward finalizing requirements for the Residential Climate Controls Program and look forward to the EPA's response.



Sincerely,

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Ingersoll Rand

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