



Carrier Corporation  
7310 West Morris Street  
Indianapolis, IN. 46231

April 7, 2017

Ms. Abigail Daken  
U.S. Environmental Protection Agency  
(Furnaces@energystar.gov)

**Re: UTC-CCS (Carrier) Comments on Version 4.1 Product Specification for ENERGY STAR Qualified Furnaces**

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Dear Ms. Daken:

These comments are submitted by UTC-Carrier Corporation's Residential Systems business unit (UTC-Carrier) in response to the US Environmental Protection Agency (EPA) request for comments on Draft Version 4.1 Product Specification for ENERGY STAR Qualified Furnaces which was issued on March 24, 2017.

We have the following comments:

First of all, we appreciate the EPA's Energy Star Program team listening to input from industry by adopting the use of an Electronically Commutated Motor (ECM) as a requirement for Energy Star qualified furnaces in place of the "e" or a FER metric. We believe this will expand the number of models eligible to carry the Energy Star logo. UTC-Carrier supports this change to ECMs, as well as the effective date of April 21, 2017.

Secondly, Table 1 references a 90% minimum AFUE for U.S. South region. We believe this should eventually move to 92% since most, if not all, domestic furnace manufacturers are already at the 92% AFUE level, or at least have models that would meet this level already available in commerce.

We thank you for the opportunity to make comments and, as always are open to further discussions in regard to this matter at your convenience.

Regards,

A handwritten signature in black ink, reading "John Gibbons". The signature is written in a cursive style with a large initial "J" and a long horizontal stroke at the end.

John J. Gibbons  
Executive Director, Regulatory Affairs  
HVAC Americas  
Carrier Corporation  
UTC Climate, Controls & Security

CC: Mr. Chris Nelson, President, HVAC Americas, UTC-Carrier  
CC: Mr. Matt Thornblad, Director, UTC Government Affairs