

REF No.	Topic	Comment	EPA Response
1	Connected Criteria	Stakeholder supports EPA's plans to work with the Department of Energy (DOE) to develop a test procedure for "connected" functionality. EPA's decision to remain silent on "connected" requirements until a resolution is obtained on issues of importance, including those related to open, standardized, communication protocols is also supported.	EPA will continue to work with stakeholders and DOE on connected criteria and a supporting test method.
2	Connected Criteria	The decision to award a performance credit once - but not until - a "connected" test procedure has been vetted with stakeholders and finalized is supported.	As noted in the Final Draft, manufacturers would not be able to use the proposed allowance to meet the minimum EER levels until an ENERGY STAR test method for verifying a RAC's demand response functionality is available and has been vetted with stakeholders.
3	Effective Date	Moving the effective date to October 1, 2013, is strongly supported as this takes into account the room air conditioner production schedule.	EPA has retained the October 1, 2013, effective date in the Final Version 3.0 specification.
4	Energy Efficiency Ratio	The Final Draft EERs appear to be missing the \geq symbol in Tables 1, 2, and 3, which is assumed to be a typographical error. EPA should ensure that the symbols appear in the final specification.	As was noted in the responses to the Draft 3 Room Air Conditioner specification comments (Comment No. 2), the exclusion of the \geq symbol was not a typographical error. This symbol is no longer necessary, since Section 3A states that for qualification, a unit's Energy Efficiency Ratio shall be greater than or equal to the minimum EER as calculated per Equation 1.
5	Energy Saver Mode	Stakeholder suggested that as an alternate to mechanical switches, disabling Energy Saver Mode may be accomplished by pressing buttons in a special sequence or time. Adding switches, special tools or removing fronts adds cost and complexity.	EPA agrees with this comment and has refined the installer accessible setting language in the specification. The updated language allows installer access via either product controls, i.e. by pressing a specific button sequence, accessing a hidden or protected installer menu and the like, or by a physical switch or jumper that requires the use of tool(s) to access.
6	Energy Saver Mode	The exceptions to the energy saver mode requirement and filter reminder requirement for through the wall units is supported. However, it is believed these exceptions should be extended to all room air conditioners.	In consideration of concerns previously raised by manufacturers when RAC units are used in hospitality and other commercial properties, EPA has retained the proposed option for through the wall (TTW) units to have a installer accessible setting that disables energy saver mode and/or the filter reminder. In these applications, visual filter reminders and energy saver mode may not be appropriate and may contribute to customer complaints and lost revenue. As this justification does not extend to residential RAC usage, EPA has not extended this option to other types of RACs.
7	Energy Saver Mode	Stakeholder continues to believe that consumer expectations may not be met by a unit that defaults to energy saver mode each time the unit is turned on regardless of whether the consumer overrode the mode the last time he or she turned on the unit. However, as this was kept, stakeholder supports the Energy Saver Mode exception for restoration of power after an outage. The exception is, as written, a little bit vague. In particular, the term "outage" could be open to interpretation. Thus, a slight modification is suggested: "However, products are not required to default to Energy Saver Mode upon restoration of power after an outage of power to the unit."	In order to encourage the use of Energy Saver Mode, the Version 3.0 RAC specification continues to require the product default to Energy Saver Mode each time the RAC is powered on. EPA agrees that the language allowing a product to not default to Energy Saver Mode after an outage should be clarified and has revised the language to indicate that the criterion applies to electrical power outage that results in loss of power to the unit.
8	Filter Reminder	Commenter does not see how the small light on the filter reminder bothers someone as there are multiple LED's and displays that are current energized while the unit is running. Having one extra LED doesn't seem to be an issue. We have never received complaints about any of our current displays. If the issue is enforced again we propose using software by pressing buttons on the electronic control panel to disable this function as it adds no extra cost to any unit.	While the light itself may not bother consumers, the filter reminder may be superfluous for units used in a commercial setting. Through the wall units that tend to be more commonly used in commercially applications are typically subject to rigorous scheduled maintenance and therefore do not need a filter reminder. Please also see comment response 5.
9	Significant Digits and Rounding	The significant digits and rounding language should be identical to DOE's requirements. It is illegal for manufacturers to make energy representations based on anything other than DOE's applicable test procedures and regulations. Accordingly, EPA need only state that qualification for ENERGY STAR must be based on the values reported to DOE in the manufacturer's certification report and appearing on the FTC EnergyGuide label. Any changes that EPA believes are required, should be addressed to DOE and DOE should issue guidance after consultation with stakeholders. EPA cannot unilaterally clarify DOE's regulations through an ENERGY STAR specification.	EPA and DOE have revised the significant digits and rounding language to cite the applicable sections of the CFR.