



July 26, 2024

The Honorable Joe Goffman
Assistant Administrator
Office of Air and Radiation
U.S. Environmental Protection Agency
Air and Radiation Docket Mail Code: 28221T
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Comments on the Phasedown of Hydrofluorocarbons: Restrictions on the Use of HFCs Under the AIM Act in Variable Refrigerant Flow Air Conditioning Subsector; Docket ID: EPA-HQ-OAR-2021-0643. 89 Fed. Reg. 53373 (June 26, 2024)

Dear Assistant Administrator Goffman:

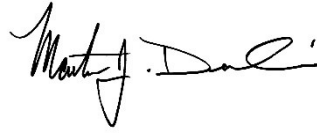
The U.S. Chamber of Commerce is pleased to provide comments on the proposed rule regarding Phasedown of Hydrofluorocarbons: Restrictions on the Use of HFCs Under the AIM Act in Variable Refrigerant Flow Air Conditioning Subsector.

The Chamber supports this proposed rule to allow the installation of new Variable Refrigerant Flow (VRF) systems for up to one year after January 1, 2026, with components manufactured before January 1, 2026. We share many of the same priorities as the Air-Conditioning, Heating and Refrigeration Institute, the Alliance for Responsible Atmospheric Policy, and the Heating, Air-conditioning & Refrigeration Distributors International – who are also commenting on the proposal – and agree that this rule offers the important relief requested by industry to make the technology transition more workable.

We support the text as written and do not recommend that EPA consider the proposed alternative, which is far too narrow to be effective in addressing several of the practical inventory challenges. This proposal would also provide a positive economic impact. Our members estimate that the sector could avoid more than \$100 million in lost revenue for VRF products by swift action from the agency.

We look forward to providing any assistance necessary to support final promulgation of this proposal.

Sincerely,

A handwritten signature in black ink, appearing to read "Marty Durbin". The signature is fluid and cursive, with a large initial "M" and a distinct "D".

Marty Durbin
President
Global Energy Institute
U.S. Chamber of Commerce

Cc: Cindy Newberg, Director of the Stratospheric *Protection* Division in the Office of Atmospheric Programs