



**RESEARCH PRODUCTS CORPORATION**

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**Aprilaire**  
Fresh Ideas for Indoor Air

July 22, 2005

Mehernaz Polad  
ICF Consulting  
1725 Eye St. NW, Suite 1000  
Washington, DC 20006

Dear Mehernaz:

This is in response to the letter with attachments dated July 8, 2005, from Andrew Fanara. In that communication, the following changes are proposed that affect our product line:

- The definition of "high capacity" dehumidifier changes from an upper limit of 120.5 pints per day (57 liters) to 185 pints per day (87.5 liters).
- The energy factor required to attain Energy Star qualification changes from 2.25 l/kWh to 2.5 l/kWh.
- The phase-in date is June 1, 2006.

Further, although it is not spelled out in the communication, further inquiry discloses that the product that we manufacture (ducted residential dehumidifier) is not covered by the standard (non-ducted portable dehumidifiers), providing a disincentive for us to improve our efficiency.

This presents the following difficulties to us:

1. Capacity definition change.

The addition of much higher capacity is being done without any discussion of whether it is even possible to attain such an energy factor at that capacity. Before this is adopted, there should at least be discussion as to whether the state of the technology is such that this is attainable, now or in the future.

2. Energy factor change.

Our product is a ducted unit, designed primarily to be ducted into a residence's heating and cooling system. It will also function as a standalone unit, and some our customers do this. Because it is designed to be ducted into the system, it requires a blower strong enough to overcome the system air pressure, and the result is a blower that is much more powerful than needed in a portable. This blower draws more power, compromising the ability to reach the efficiency goal. We are already at a disadvantage compared to portable units as a result, and raising the standard from 2.25 to 2.5 increases that disadvantage.

3. Phase-In date.

I echo the prior communication from Whirlpool's representative. Attaining a higher efficiency level is not just a matter of changing a few parts. If it were that easy we and others would already have done it. Research and trial and error are required to advance the state of the technology, and this takes time. Even if we started today we could not have a product ready for market by June of next year.



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4. Not covered by standard.

The EPA's understanding that ducted dehumidifiers are strictly commercial products is out of date. There are at present at least two companies competing in this arena, and with the current market growth rates, we expect there to be more soon. We see value in having an Energy Star on the product, and we accept that the nature of the Energy Star program calls for continual improvement, but putting us in a category where the goal is too distant removes any incentive to reach for it.

We propose the following:

1. Create a separate "Residential Ducted Dehumidifier" category. This would be for products whose primary intended purpose is to be ducted into a residential heating and cooling system for the purpose of dehumidifying the entire home.
2. Set the bin capacity to a range of 75-120 pints per day. Initiate a discussion of what the energy factor should be for a potential future separate capacity bin of 121-185 pints per day.
3. Start the energy factor at 2.25 l/kWh in the short run, and phase in a standard of 2.5 l/kWh on June 1, 2007.

This has the following advantages:

1. It puts the Energy Star program in the forefront of a growing market.
2. It provides the ducted dehumidifier industry (Research Products included) with a realistic goal and a tangible benefit.
3. It removes the need for whole-house ducted dehumidifiers to compete on an unequal footing with portable dehumidifiers.

Please feel free to call me at 608-310-6163, or email me at [jwp@aprilaire.com](mailto:jwp@aprilaire.com).  
Again, thanks for the opportunity to comment.

Sincerely,

Jon Paulos  
Product Manager

jwp