



Natural Resources  
Canada

Ressources naturelles  
Canada

October 1, 2008

Mr. Andrew Fanara  
US Environmental Protection Agency  
Washington, DC 20460

Dear Mr. Fanara:

Comments on proposed changes to the ENERGY STAR Residential Ventilating Fan Specification

On behalf of Natural Resources Canada (NRCan), thank you for the opportunity to comment on the proposed changes to the ENERGY STAR specification for ventilating fans.

Regarding the present system of testing and rating fans, there does not seem to be a strong case for major changes.

The present system of 3<sup>rd</sup> party verification through HVI mirrors the system used in Canada for verification of ratings for equipment that must meet Canada's Energy Efficiency Regulations. The established process provided by HVI to verify ratings and allow for challenges of ratings appears to work well and has been adopted by most or all of the industry.

The wording in the bullet points 2 to 4 in your letter of September 10, 2008 such as "in lieu of certification", "is considering", and "hopes to collaborate" would indicate there are still a number of unknowns, and uncertainty that a new system would be superior or equivalent in ensuring the quality of ratings as compared with the present system for ventilating fans.

In summary, NRCan believes that verification of ratings for ENERGY STAR equipment is increasingly important, and changes should not be undertaken to reduce the stringency of the process.

Regards,

Brian Killins  
Senior Standards Engineer  
Equipment Division  
Office of Energy Efficiency

Copy to: Josh Forgotson, ICFI