



To: Ann Bailey, Director
ENERGY STAR Product Labeling
U.S. Environmental Protection Agency

October 8, 2012

From: Jim Boldt
Vice President Engineering
Broan-NuTone LLC

Subject: ENERGY STAR Most Efficient Pilot Program Evaluation

Thank you for the opportunity to comment on the ENERGY STAR Most Efficient Pilot Program Evaluation outlined in the September 14, 2012 Release.

Broan-NuTone is North America's largest manufacturer of ENERGY STAR Ventilating Fans and has been a key participant in the development and revision of the ENERGY STAR Program for Ventilating Fans. We support the proposed ENERGY STAR Most Efficient Program for Ventilating Fans and would like to offer some enhancement suggestions.

We would like to recommend that the Efficacy for the Most Efficient Program be increased to 8.0 cfm/W for all air flows. 8.0 cfm/W is the efficacy that is required for whole-house mechanical Ventilation Fans in the current draft of ASHRAE 90.2, Energy Efficient Design of Low-Rise Residential Buildings. As most of these high efficiency fans were designed for continuous whole house ventilation, it would then clearly indicate that the ENERGY STAR Most Efficient Fans meet the stringent building code requirements. Manufacturers would then market ENERGY STAR Most Efficient Fans as the solution.

The movement from 7.5 cfm/W and 6.8 cfm/W to 8.0 cfm/W would only affect a small handful of potential fan program candidates. I feel the marketing upside far outweighs the fewer products listed.

I look forward to the implementation of this exciting program.