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Sent: Friday, April 30, 2010 8:58 PM
To: energystarverificationprogram@energystar.gov
Cc: vokes.kathleen@epa.gov; Forgotson, Joshua
Subject: Comments re: Energy Star Enhanced Verification Program

Comments regarding Enhanced Testing & Verification process

Thank you for the opportunity to provide feedback. Air King fully supports the goals that led to the enhanced testing & verification process proposal. As a participant from the beginning we have a significant investment in our Energy Star products and the Energy Star program is fundamental to our marketing efforts, so the credibility of the program is very important to us.

That being said, we believe that the existing program for ventilating fans is strong and provides adequate assurance that the requirements for qualification are met. We feel strongly that verification testing must include procurement on the open market and testing at competent 3rd party laboratories familiar with the nuances of the products being tested. This is especially true when testing sound ratings of a product that is quieter than the ambient in most facilities.

We understand the desire to have the DOE audit the program with independent testing. Presumably any program that involves DOE testing will eventually result in published test results. In this scenario there are some practical problems that need to be considered. Within the existing Energy Star ventilating fan program the certifying organizations have established tolerances on performance that define the limits of acceptable variation and still maintain certification. It is unclear whether the DOE program will accept variation.

Further, there are differences between what the certification organizations consider acceptable. These need to be harmonized, for example the HVI program requires input Watts to be within 10% of Rating whereas the AMCA program requires input Watts to be within the greater of 5% of rating or 50 Watts. 5% seems tighter but the bath fans on the QPL average 32 Watts and a 50 Watt tolerance means the tested product could draw 82 Watts, almost 3 times rated usage & maintain certification.

We believe an unintended consequence of version 2.2 of the program is that the Energy Star rating is based on reported test results, with no opportunity for the manufacturer to be conservative to assure production samples meet rated data. Statistical process control theory tells us that there will be variations in performance and even how to predict the range of performance with a desired confidence level. We believe manufacturers should be able to rate the product conservatively to assure end users get at least what was advertised.

Lastly, we believe the QPL should be verified regularly to assure that products are still in production and carry the same ratings as originally accepted.

Again we fully support the enhanced verification process but feel there are several important issues that must be addressed in a DOE verification program.

Best regards,

John Fox
CEO
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