



TO: Kathleen Vokes
EPA ENERGY STAR

April 20, 2010

From: Jim Boldt
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Subject: Comments Relating to the ENERGY STAR Products Enhanced Testing and Verification

Thank you for the opportunity to comment on the ENERGY STAR Products Enhanced Testing and Verification Program outlined in the March 26, 2010 and March 29, 2010 webinars.

Broan-NuTone has been a key participant in the development and revision of the ENERGY STAR Program for Ventilating Fans. The Ventilating Fan Program for many years has advanced the principles of Independent Third Party Qualification, Certification, Verification and Challenge Testing. We find that these tenets provide protection to the consumers who purchase a Ventilating Fan product.

We strongly believe that the testing must be done by an approved Independent Third Party Laboratory to insure the integrity and defensibility of the program. We also support the need to independently procure the products on the open market for verification and challenge testing. Independently procuring the products insures that the consumer can expect the purchased performance with any product selected.

We are concerned with the DOE Verification Testing Program briefly discussed in the webinar. Unless the DOE utilizes the same qualification and verification testing protocols in the identified and approved laboratories, their results may be meaningless and potentially damaging to the ENERGY STAR Program's credibility. We welcome the opportunity to work with the DOE in the development of their testing protocol and laboratory approvals.

Thank you for your consideration of my comments.