



29 April 2010

Kathleen Vokes
U.S. EPA
Climate Protection Partnership Division
Energy Star Program
1200 Pennsylvania Ave NW
Washington, DC 20460

VIA E-MAIL TO ENERGYSTARVERIFICATIONPROGRAM@ENERGYSTAR.GOV

RE: Energy Star Products Enhanced Testing and Verification

Dear Ms. Vokes,

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.

The Home Ventilating Institute (HVI) and its members have been key participants in the development of and revisions to the Energy Star Program for Ventilating Fans.

The Ventilating Fan Program stands as a model for all other Energy Star programs. For many years, the program has championed the principles of independent third-party qualification, certification, verification and challenge testing. Adhering to this philosophy provides protection to the consumers who purchase our products. HVI and its members want to encourage DOE and EPA officials to continue on this path and strive to improve Energy Star programs across all industries.

It is our considered opinion that your effort to adopt regulations in other industries which are similar to those we utilize for the Ventilating Fan Program is appropriate, timely and completely justified. We strongly believe the testing of all Energy Star products, across all industries, must be done by approved independent third-party laboratories and the corresponding product certification administered by reputable third-party entities to ensure the integrity and credibility of the various industry programs. We also support Energy Star program requirements to independently procure the products on the open market for verification and challenge testing.

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Several of our staff, volunteer leadership and general membership participated in your recent webinars and heard, first-hand, the expressed reluctance of manufacturers in other industries who are resistant to the changes you are proposing. We encourage you to march boldly forward with your plans for improvement, knowing that it's the best course of action and will ultimately benefit the consumers you strive to protect. There will be growing pains, just as there have been in the residential ventilation industry, but we believe even those who resist the most will eventually see the value in the program modifications. DOE and EPA must act to improve the credibility of all Energy Star programs or the success of the Residential Ventilation Fan Program will be jeopardized. Consistency in qualification criteria is key.

HVI and its members look forward to continued involvement in your efforts to improve the Energy Star programs.

Kind regards,

Jacki Donner, CAE
Executive Director

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