

Josh,

After reviewing the proposed ENERGY STAR Program Requirements for Residential Ventilating Fans (version 2.1), AMCA's comments are as follows:

Section 4) Product Testing: This section should also reference AMCA 311 *Certified Ratings Program - Product Rating Manual for Fan Sound Performance*.

Section 4) B. 2. Test equipment can not measure to one hundredth of a watt. We recommend that power should be rounded to the nearest watt.

Section 4) C. This section should also reference AMCA 311 *Certified Ratings Program - Product Rating Manual for Fan Sound Performance*.

Section 5) We agree that there should be some accreditation requirement for the lab. AMCA is accredited by A2LA to meet the requirements of ISO 17025. Our members, however, in most cases do not have the same resources as AMCA to attain ISO 17025 accreditation. Forcing ISO 17025 for the program would meet vehement objection from many manufacturers. We suggest that, if a manufacturer intends to use their own lab to rate their product line for Energy Star, the manufacturer's lab shall be accredited by a third party and at least one test of all the tests run on each model line shall be verified by a lab accredited in accordance with ISO 17025. Otherwise, all tests needs to be run in a lab accredited in accordance with ISO 17025. We can also suggest tolerances for the verification test if you desire.

Sincerely,

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