



November 26, 2008

Josh Forgotson
ICF International

Re: Energy Star Ventilation Fan Program Version 2.1 Draft 2

Dear Mr. Forgotson,

Regarding the second Draft I would like to make the following comments.

Regarding paragraph 4C this draft differs from the HVI rating program by requiring reported airflow to the nearest whole CFM. This choice has some unintended consequences. From a ratings standpoint an HVI certified fan that has published both CFM and Watts, an end user could perform a calculation and get a different CFM/Watt than shown in the Energy Star Qualified Product List. This could be corrected by allowing the manufacturer to submit a rated CFM/Watt on the QPI form which would be shown in the ES Qualified Product List along with the actual data. There are several advantages to rounding down to the nearest 10 CFM rather than 1 cfm. First this creates a built in safety factor that helps ensure consumers get at least what they were promised, and it simplifies the selection process for the consumer by creating standard grades. This is common in construction for items like sheet rock, ductwork, plumbing, HVAC systems & the like. It allows grouping of like items from different manufacturers that are interchangeable, and prevents consumers from making buying decisions on differences in ratings numbers that are in fact imperceptible in actual use. It also discourages manufacturers from playing games with test units that are better than production units to squeeze the most they can out of a single sample when they have no intention of producing product that way. It has been my observation over the years that such categorization protects reputable manufacturers and I would encourage you to change to the nearest 10 cfm in the program.

Regarding Paragraph 5B, Excellent addition, Thank You.

Regarding Paragraph 6 combined with paragraph 4A. I believe these sections have unintended consequences when taken together. All Energy Star Qualified Products today would be certified to HVI. The certification testing of the highest efficiency products would have been performed at Texas Experimental Engineering Station because of the low sound testing capabilities. These products are far better than the 2.0 Sone requirement for Energy Star Qualification. The lab at TEES did not comply with ISO 17025 as recently as August of 2008, so these products would no longer qualify, at least as I read paragraph 6B which is in direct conflict with line 468 & 469. As draft 2.1 is written all the best products on the QPL would no longer qualify. Testing at AMCA dated prior to 17025 compliance would no longer be valid, all TEES data would not be valid.

Regarding Paragraph 5B combined with paragraph 6, I believe these sections have unintended consequences when taken together. Neither HVI nor AMCA assure check test or verification testing of all Energy Star products every 3 years so no product could be added to the QPL and every product would have to be removed until AMCA and HVI amend their programs to comply with the new requirement.

As I read the document paragraph 6B needs to be modified to allow the new provisions for compliance with 17025 and the changes to AMCA & HVI programs to take effect.

Thank you for the opportunity to review this document.

Best regards,

John C. Fox, P.E.
CEO Air King Ventilation Products

CC:

HVI Board
AMCA
TEES
Andrew Fanara, EPA