

Joshua,

Thank you for the opportunity to comment. This version of the document includes substantial improvement over previous versions, though I still have 2 concerns. The first pertains to acceptance of existing ratings. It appears that as of Jan 2010 all products must have been tested in a lab accredited per section 6. All partners have fans tested at either/both Amca and TEES prior to either lab having such accreditation. Is it your intent that all these products be retested before Jan 2010? Based on past rules few products would meet that requirement as of today so most products would have to be retested before Jan 2010. I do not believe there is sufficient test lab capacity to accomplish this. I would suggest you allow the retest of all base models within 3 years requirement take care of old data.

My second concern has to do with verification testing tolerances and the difference between HVI and AMCA. Residential exhaust fans would fall under rating method "F" in AMCA 211-05 (see attached excerpts). Section 9.6.2 specifically states that publication of Watts is optional if less than 500 Watts. An energy star labeled 150 cfm exhaust fan could require a maximum of 53.6 Watts and still qualify as "Energy Star". If Watts are not published there would be no requirement for Amca to verify electrical input. Further if Watts are published, section 10.1.2.2 states that verification tolerance does not apply to fans when the motor input power is less than 500 Watts. That would exclude virtually all fans currently in the program. I do not see how we can have program promoting energy efficiency that never requires energy usage verification. Rather than trying to reconcile differences between the programs I would suggest the addition of a requirement that the verification result for cfm/Watt be no less than the value the manufacturer lists on the QPL or the rating must be revised. I would also suggest a manufacturer be allowed to derate his product if he so chooses so that he is certain to achieve the requirement as we are all capable of producing product well in excess of the basic requirement.

Thank you for your consideration of these matters.

You may publish these comments.

John Fox
Air King