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September 25, 2008

TO: Josh Forgotson
ICF International
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RE: Proposed changes to ENERGY STAR Program Requirements for Residential Ventilating Fans

Our company has chosen to have its products certified for performance by the Home Ventilating Institute (HVI). We do so with the best interests of the industry and consumers in mind. The HVI Certification, Verification, and Challenge Programs ensure a level playing field for manufacturers and importers, thereby protecting consumers. Your proposal to eliminate the requirement for HVI certification weakens the industry and invites the misrepresentation of performance ratings in the market place. HVI has been policing the ventilation industry since 1955 and has established credibility as the independent, unbiased monitor of product performance. We are strongly opposed to the proposed elimination of the requirement for HVI-Certification.

If any changes are to be made to the ENERGY STAR program, it is imperative that alternative, comprehensive certification, verification and challenge procedures, in which the products are procured in the market place as opposed to provided by the manufacturer, are established prior to moving forward with any changes. To adopt the proposal as currently written would be irresponsible. It's worth noting that the benefits of the HVI Certification, Verification and Challenge Programs come at no cost to the EPA. Establishment of an effective alternate system to monitor and police the industry will require substantial government budget allocations and manpower.

Sincerely,

Matt Leger
R&D Senior Technician
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