

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

Josh –

I think it would be a major mistake to remove HVI Certification as a requirement for Energy Star listing of residential ventilation products. 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. The wording changes from "must be tested and certified by HVI . . ." to "must be tested in accordance with ANSI/ASHRAE Standard 51-07 ANSI/AMCA Standard 210-07 . . ." opens the door to all sorts of nefarious activity.

There are companies out there that are promoting product performance of un-Certified products that are . . . to be blunt . . . lying about how their products work. The only thing that protects the consumer is the HVI Certification process which is certainly a challenge but certainly fair. I think it would be extremely ill-advised to remove that requirement. It will truly weaken the Energy Star mark which would be bad for everyone. The 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. I would wonder if EPA has the man-power (particularly in these economic times) to run around to fan manufacturers and make sure they are testing to the ANSI/ASHRAE standard.

Sincerely,



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