

Josh:

On behalf of Panasonic Home and Environment Company, I would like to thank you for the opportunity to comment on the final draft of Version 2.1 of the ENERGY STAR Residential Ventilating Fan program specifications. You appear to have taken a number suggestions from the previous drafts into account and the final document is much better that it was. It is still unclear about the status of the existing listings, since the draft still states that the products certified under Version 2.0 are still valid under Version 2.1 but then states that Grandfathering is not allowed. It also states twice that the approved testing labs have one year from the effective date to obtain ISO 17025 certification but also states they must be in compliance by January 1, 2010. Since comments are due January 5th and you state you are trying for an effective date of January 15th, these statements are in conflict. A minor issue if you can meet your schedule, but a bigger issue if you are delayed again.

I look forward to the final and effective version of this set of specifications. As the Chair of the HVI Lab Oversight Committee, I will be working with both labs authorized to do third party testing for both HVI and AMCA to ensure they meet these new requirements.

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