

Dear Mr. Forgotson,

RenewAire, as a manufacturer having ventilation fans qualified in the Energy Star Program, appreciates the opportunity to comment on the revised program specifications.

As we commented on the first draft, our strong preference is that HVI Certification of product be a requirement for the program. HVI requires a third part laboratory to test production products. HVI conducts regular, unannounced verification testing of product acquired from the sales channel not from the manufacturer. This verification insures that products shipped meet the published performance. Alternative programs that allow manufacturer's laboratories to perform certification or verification testing do not provide adequate performance assurance to Energy Star or adequate consumer protection.

We do support the requirement to provide the third party test data for airflow rounded down to the nearest whole CFM in order to clearly differentiate Energy Star qualified product performance. We believe this will lead to demand for superior performing product available in the market.

With best wishes,

Douglas Steege
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