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

RenewAire is a recent participant in the Energy Star Program for Residential Ventilating Fans. Our ventilation fans are HVI Certified. We also participate in the HVI Certification program for Energy Recovery Ventilators and Heat Recovery Ventilators and the AHRI Certification program for Energy Recovery Ventilation equipment. We are opposed to the proposed replacement of the Energy Star Ventilation Fan Program requirement for HVI-Certification with a provision that allows HVI, AMCA or self-certification.

As a small company, introducing a new product, we want to have a clearly defined program with minimal cost for testing, Certification, Energy Star Qualification and Verification. Every lab produces different test results. We can not afford to test our product at multiple labs like an established company with large sales revenue can afford to do. We do not want to pay the price to be involved with two Certification organizations. We do not think it is fair if large companies could achieve Qualification by testing in their own lab. All-in-all we feel that the HVI program for ventilation fans has a reasonable cost for participation, Certification and Verification and we know our ratings with excellent certainty. Opening up this program, from our perspective, will stifle innovation and favor only large companies at the expense of the consumer and energy efficiency.

We do support the revision to round the airflow to the nearest whole CFM instead of down to the nearest ten CFM. The current program requirement is unnecessary from a testing tolerance perspective. The current rounding can significantly reduce apparent product performance so there is less differentiation between products. We support the intent of the Energy Star Program to clearly identify the best performing products.

In summary, I believe this program is clearly understandable and readily administered by EPA. The HVI Certification requirement uses an established program that offers Certification and Verification at a reasonable cost to the participating product manufacturers and to the taxpayers. A few revisions to improve the program and direct the Certification organization (HVI), is a good idea. Beyond that - if it isn't broken why implement major unpredictable and expensive changes to the program?

Thank you for your consideration.

Douglas Steege
VP, Marketing and Sales

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