

Josh Forgotson

IFCI

Re: Energy Star Ventilation Fan Program Version 2.1 Draft 2

November 26, 2008

Thank you in advance for the opportunity and for taking the time to review the comments brought forth by the stakeholders in the Energy Star Program for Residential Ventilating Fans.

Soler and Palau Ventilation Group is a proud member of both HVI and AMCA and we have listed products with Energy Star since 2006. As a manufacturer of both residential and commercial ventilation products, we recognize the importance of both organizations and we see great value in each.

In regards to the revised draft, we would like to provide the following comments:

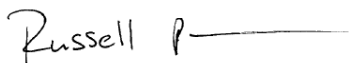
We are very pleased to see that Energy Star has reinstated the certification requirements and verification and challenge testing. We feel that this was imperative to protect the integrity of the program and reputation of those manufacturers who are enlisted. We would however, like to ask that the organizations permitted to certify products in the program are limited to only HVI and AMCA and the testing laboratories be limited to AMCA and TEES. Leaving the opportunity for manufacturers or other testing organizations to test and/or certify products will create unnecessary work for Energy Star and will consume staff resources that could be focused on other programs (i.e. – a commercial ventilation program).

ISO 17025 accreditation is a very important consideration, but we do not feel that is acceptable to close the door on TEES until they complete the process. A reasonable timeframe needs to be allotted for compliance if it is decided that it is imperative. It could be viewed as a means to except an organization or laboratory from the program if the timeframe is not allotted.

In regards to CFM rounding, we would like to see Energy Star maintain the HVI procedure of rounding down to the nearest 10 CFM. Rounding to the nearest CFM may have value to a specifying engineer who can calculate density and power corrections, but providing the information to the consumer could be misleading and confusing.

We appreciate that it is difficult and time consuming to sort through the comments presented and thank you for the opportunity to contribute.

Respectfully,



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