



Drummondville, November 25, 2008

Mr. John Forgotson
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Mr. Forgotson

RE: Energy Star Fan Specification ver. 2.1, Draft # 2

We appreciate the opportunity to comment on the proposed draft. We are of the opinion that the new draft is much better than the previous one and that it will help to maintain the strength of the Energy Star Ventilation Fan program.

However, this second draft should be improved by modifying the following sections:

- The pre-authorized laboratories (section 4-A) should be limited, for the time being, to Energy System Laboratory at Texas A & M University and AMCA International Laboratory in Arlington Heights Illinois. Over the past years, we have been involved in comparing sound measurements from other labs, including the two mentioned above. We have huge concerns that the requirements described in 4-A, if other labs are added to the list, will not ensure a fair comparison of products. The authorization of other labs should be allowed only once specific requirements are agreed between EPA, AMCA and HVI.
- In paragraph 4) C – 1, the calculation refers to rounding to the nearest cfm. It has been an accepted industry practice for decades to round down to the nearest 10 cfm. Changing this practice could create confusion in the market place. It could also force manufacturers to bear the costs of adapting their literature for a change that is unnecessary. The current methodology of rounding down to the nearest 10 cfm works perfectly; there is no need to change it.

I would like to reiterate that the draft #2 of the Energy Star Specification for Ventilating Fans is a clear improvement over the previous one. With the proposed changes mentioned above, it will be even better.



We anticipate that Energy Star rated products will become a much more important portion of our business in the future. Accordingly, we will welcome any opportunity to comment and to participate on changes to the specifications for related Energy Star products.

Sincerely,

Daniel Forest
Vice President, Technology & Product Development

cc.: Andrew Fanara, EPA