

March 20, 2018

Ms. Abigail Daken  
Product Manager – Energy Star for HVAC  
US Environmental Protection Agency  
1200 Pennsylvania Avenue Washington, DC 20460

Dear Ms. Daken:

I am writing this letter in general support of the changes to the Product Specification for Residential Ventilation Fans Draft Version 4.1, that were made to document the inclusion of Inline Fans that are marketed as Supply Fans. I would, however, like to recommend some changes to the Minimum Efficacy Level (CFM/W) for supply fans that are tested and sold with an air filter.

A 12" X 12" X 1" air filter with minimal filtration efficiency will likely create a 0.1" w.g. pressure drop at the velocities that are typical for residential Inline Fans. Based on a review of HVI airflow test reports for a typical 220 CFM Inline Fan that is Energy Star certified, this additional 0.1" w.g. pressure drop will likely result in a reduction of 15 to 20 cfm. This reduction in airflow would change the efficacy of this fan from 3.9 CFM/W to 3.6 CFM/W. Based on this analysis, I recommend that the minimum efficacy for an Inline Supply Fan with a MERV 6 air filter should be 3.6 CFM/W.

Consumers and local codes will be demanding higher levels of filtration than the MERV 6 that is referenced in the 4.1 draft version. To keep these program requirements both relevant and adaptable, I am suggesting the following minimum efficacy levels for Inline Supply Fans that are tested and sold with an air filter:

≥ MERV 6 3.6 CFM/Watt\*

≥ MERV 8 3.4 CFM/Watt\*

≥ MERV 13 3.1 CFM/Watt\*

\* These suggested efficacy levels are based on internal testing that was conducted at American Aldes. Tests were conducted on 12" X 12" X 1" standard pleated filters that were purchased online.

Thank you,



Gary Crow  
Director of Engineering  
American Aldes Ventilation Corporation