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June 29, 2018

Via E-Mail

Abigail Daken
U.S. Environmental Protection Agency
ENERGY STAR Appliance Program

VentilatingFans@energystar.gov

Re: ENERGY STAR Program Requirements; Product Specification for
Residential Ventilating Fans, Eligibility Criteria, Final Draft Version 4.1

Dear Ms. Daken:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide our comments on the Final Draft ENERGY STAR Product Specification for Residential Ventilating Fans, Eligibility Criteria, Version 4.1. AHAM appreciates that EPA was responsive to AHAM's comments and concerns on Draft 1 of Version 4.1.

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM opposed the proposed mandatory reporting requirements for efficacy and sound level at 0.1 w.g. for range hoods that appeared in Draft 1 of Version 4.1. In the Final Draft, EPA indicates it will not pursue reporting requirements for range hoods at this time and will remove all reporting requirements for range hoods from the final Version 4.1, including static pressure reference measurements. AHAM thanks EPA for making this change—we fully support the removal of reporting requirements for range hoods for all of the reasons we described in our April 10, 2018 comments.

In our previous comments, AHAM also sought to confirm that EPA did not intend to change the current specification's requirements with regard to lighting which, for ventilation fans, indicate

that if an ENERGY STAR certified bulb is included with the ventilating fan, there is no need to test it in the unit. We appreciate EPA's clarification in its summary of the Final Draft confirming that ventilating fans that are shipped with ENERGY STAR certified lamps are exempt from In Situ Air Temperature Testing and Minimum Light Output requirements in the Luminaires specification.

AHAM appreciates the opportunity to submit comments on the Final Draft ENERGY STAR Product Specification for Residential Ventilating Fans, Eligibility Criteria, Version 4.1 and would be glad to further discuss these matters should you so request.

Best Regards,

A handwritten signature in cursive script that reads "Jennifer Cleary". The signature is written in black ink and is positioned above the printed name and title.

Jennifer Cleary
Senior Director, Regulatory Affairs