

December 19, 2014

Ms. Abigail Daken  
U.S. Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, DC 20460

Dear Abigail:

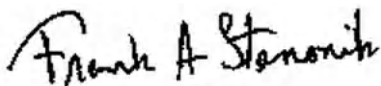
We have reviewed the November 17, 2014 letter regarding the U.S. Environmental Protection Agency's (EPA) intention to amend the ENERGY STAR Furnace specification to adopt the new furnace fan efficiency metric FER.

We support the objective to set an FER level equivalent to the "(e) less than or equal to 2.0%" requirement such that currently qualified products may remain qualified. However, at this time we are unable to provide the data which EPA is seeking, as listed in the letter. Because FER is a new metric, many manufacturers are not yet familiar with the test procedure. At the present time, this test need be conducted only if the manufacturer chooses to provide the FER for a model. Coupled with this, the industry is facing other significant rulemaking activities which are requiring the manufacturers to allocate significant amounts of the time and resources, including their testing facilities, to address those rulemakings. Consequently most manufacturers have not even started to test for FER. We are interested in providing the information, but this data collection process will take some time. We will consult with our members to determine an approximate date by which we would be able to share some FER information. We will advise you of that date once that determination has been made.

Recognizing that this matter will take some time, we request that EPA rethink its schedule for making this change. The "e" metric, which relates to estimated annual consumption, is not the same thing as FER, an efficiency rating. We are not convinced that the establishment of an FER test procedure precludes manufacturers from using the "e" metric and have asked DOE for clarification on this point. DOE has not answered that question yet. Regardless, we do not see the immediate need to replace the "(e) less than or equal to 2.0%" requirement with a FER requirement, particularly when the FER standard does not go into effect until July 2019.

We appreciate the opportunity to comment on this matter.

Respectfully submitted,



Frank A. Stanonik  
Chief Technical Advisor