



December 8, 2014

Abigail Daken
Product Manager
ENERGY STAR for HVAC

Ms. Daken,

Thank you for the opportunity to provide stakeholder input regarding Final Draft Version 4.0 product specification for ENERGY STAR qualified residential ventilating fans.

Delta supports the EPA's conclusion that there will be a sufficient variety of ENERGY STAR models available to consumers at the originally proposed efficacy levels.

Additionally, to ensure ENERGY STAR remains a market differentiator in this product category, Delta recommends changes to maximum allowable sound levels for bathroom fans.

Final Draft V4.0 states the following:

Bathroom Fans

10-89 CFM	2.0 sones
90-200 CFM	2.0 sones
201-500 CFM	3.0 sones

However, research shows:

Of the 1,713 ENERGY STAR® qualified bathroom exhaust fans 10-89 CFM listed in HVI's published certified products directory today, only one (1) model exceeds 2.0 sones.

Of the 873 ENERGY STAR® qualified bathroom exhaust fans 90-200 CFM listed in HVI's published certified products directory today, only two (2) models exceed 2.0 sones.

Of the 8 ENERGY STAR® qualified bathroom exhaust fans 201-500 CFM listed in HVI's published certified products directory today, zero (0) models exceed 3.0 sones.

The following changes are suggested for maximum allowable sound levels of bathroom fans to ensure ENERGY STAR remains a market differentiator.

10 to 89 CFM,	to 1.0 sone
90 to 200 CFM,	to 1.5 sones
201 to 500 CFM,	to 2.0 sones

Thank you for the opportunity to provide stakeholder input.

Best regards,

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