



19 December 2014

Abigail Daken, Product Manager
ENERGY STAR for HVAC

Via email to: ventilatingfans@energystar.gov

RE: ENERGY STAR Program Requirements Product Specification for Residential Ventilating Fans v4.0 proposed final draft

Dear Ms. Daken,

Thank you for the opportunity to provide input on the EPA's proposed changes to the ENERGY STAR Program Requirements Product Specification for Residential Ventilating Fans v3.2. Our intent herein is to summarize the input of HVI Members and Staff who are familiar with and have a stake in this ENERGY STAR program.

If we were surprised by EPA's proposal from June 2014, we were even more surprised by this latest draft specification. First, you have our gratitude for removing the 500 cfm maximum threshold on kitchen range hoods. We believe the 75 Watts input power requirement will not unnecessarily hinder and could, perhaps, encourage manufacturers of high-end range hoods to avail themselves of the opportunity to offer ENERGY STAR-labeled products to their customers.

Issue #1: IMPLEMENTATION DATE

Your cover memo indicates manufacturers will be permitted to certify to v4.0 as early as January 1, 2015. However, based on the broad changes to the spec, the QPX upload will need to be overhauled and user-tested. We feel it's unlikely the infrastructure will be in place by January 1 on EPA's side of things. And the infrastructure will certainly not be in place on the CB's side of things. This timeline, as has been conveyed to you previously, is too aggressive.

Issue #2: HVI DOCUMENT REFERENCE

Please update the Static Pressure Reference Measurements section of the specification as follows:

- *HVI Publication 920 Product Performance Certification Procedure Including Verification and Challenge*© (2014)

HVI appreciates the opportunity to provide this input for the ENERGY STAR Program Requirements Product Specification for Residential Ventilating Fans v4.0 proposed final draft and we stand ready to engage in further discussions with EPA.

Kind regards,

Jacki Donner, CAE
Executive Director/CEO

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