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VIA EMAIL TO: daken.abigail@epa.gov

Subject: HVI Response to *ENERGY STAR Program Requirements Product Specification for Residential Ventilating Fans Version 4.1* June 15, 2018 Limited Topic Proposal

Thank you for the opportunity to provide the following input to the *ENERGY STAR Program Requirements Product Specification for Residential Ventilating Fans Version 4.1 - June 15, 2018 Limited Topic Proposal*. By continuing to work together, US EPA and key stakeholders, most notably HVI, can continually advance the adoption and growth of energy-saving ENERGY STAR products in the marketplace.

Definitions

HVI supports the proposed revision to the Product Family definition.

Efficacy Requirements

We would request that EPA change the Product Type Titles in Table 2 to include the term Supply Fans. Our proposed changes are follows:

Existing Table 2 Product Types:

In-Line (Single-Port and Multi-Port) Fans tested with a filter in place ($6 \leq \text{MERV} < 13$) and
In-Line (Single-Port and Multi-Port) Fans tested with a filter in place ($\text{MERV} \geq 13$)

Recommended Table 2 Product Types:

In-Line (Single-Port and Multi-Port) and Supply Fans tested with a filter in place ($6 \leq \text{MERV} < 13$)
and
In-Line (Single-Port and Multi-Port) and Supply Fans tested with a filter in place ($\text{MERV} \geq 13$)

HVI would like to propose that we implement the program efficacies as stated, with an understanding that after a larger population of certified product data becomes available, that the binning for efficacy levels could be adjusted with an EPA interim clarification document.

Optional Reporting Requirements

We support the removal of the Optional Reporting Requirements.

Lighting Requirements

HVI supports the clarification of Lighting Requirements.

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We wish to thank you again for seeking stakeholder comments and recommendations for the V4.1 Limited Topic Proposals. The proposed changes make the 4.1 revision a stronger and more obtainable specification.

HVI stands ready to provide further support to EPA should additional questions arise. Please reach out to Jim Boldt, HVI Engineering Director, at industry@hvi.org with any questions you may have.

Kind regards,

A handwritten signature in blue ink that reads "Jacki Donner". The signature is fluid and cursive, with the first name "Jacki" and last name "Donner" clearly legible.

Jacki Donner, CAE
CEO