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December 17, 2014

Abigail;

Thank you for the opportunity to comment on the proposed changes to ENERGY STAR's Ventilation Requirements, V 4.0 Final Draft. As an original manufacturer to attain ENERGY STAR Ventilation Fan recognition and as an ENERGY STAR Partner of the Year over the past six years, we heartily welcome and endorse the need to update to V 4.0 and appreciate the opportunity to offer our comments on the proposal.

Although Panasonic agrees with most of the final draft proposal, there are four issues for which we feel we need to comment.

Installed Fan Performance - Section 3:D.; Notes & Lines 163 - 171:

Panasonic endorses the requirement to meet fan performance levels at ASHRAE's endorsed 'installed static pressure' airflow efficiency levels of 70% at 0.25 WG compared to 0.10 WG for all fans. However, it seems inconsistent that in Section 3-B, CFM/W and Sone must be met for every airflow/speed but the Installed Fan Performance of 70% does not have to be met at every speed.

Please note that some manufacturers have in the past created multispeed fans that met ENERGY STAR qualifications on high speed at 0.1 and at 0.25 but moved little or no air at 0.25 WG while on lower speeds. The adoption of the new requirement that the fans have to meet the efficacy and sound requirements for all speeds should help address that issue. Panasonic believes that allowing an ENERGY STAR label on a fan that moves little or no air at the ASHRAE established installed performance level, 0.25 WG, should be unacceptable to ENERGY STAR because it would lead to poor customer satisfaction and, potentially, IAQ issues. Therefore, we urge EPA to review and revise this requirement to extend the Installed Efficiency of 70% to all speeds.

Warranty - Section 3C: Notes Lines 159-160:

The use of the Installed Performance percentage was a small measure of fan quality adopted by EPA in Version 2.0 effective October 1, 2003 in lieu of a two-year warranty requirement. The stated intention to increase the warranty period to three years was in the original ENERGY STAR Ventilation Fan specs (Tier II in Version 1.0) but was instead replaced by the referenced Installed Performance requirement. This reduced warranty requirement was approved in order to facilitate broader manufacturer participation in the new program. Panasonic opposed the reduction in the specifications because a stronger warranty would provide better assurance of performance and ultimately customer satisfaction that is the hallmark of EPA's ENERGY S

STAR principles. Now that broader participation has been secured in the well-established ventilation fan program, Panasonic believes it prudent that EPA address the warranty issue in the next spec revision and increase the warranty period for ENERGY STAR certified fans.

## Reporting of Sone Levels at 0.25 WG

Panasonic notes that the proposal to report Sone levels for ENERGY STAR Certified Fans at 0.25 WG has been dropped from the final draft of Version 4.0. While we acknowledge push back by some manufacturers to this proposal, we would point out that many customer satisfaction issues involve noise levels of appliances in the home. Since ENERGY STAR is concerned with customer satisfaction issues linked to the performance of installed appliances within the home, noise levels certainly could affect how often ventilation fans are used.

Although this item was not included in the ENERGY STAR V 4.0 Requirements, Panasonic recommends creating a mandatory reporting of Sone Levels at 0.25 WG in at least the ENERGY STAR Most Efficient Category going forward. Panasonic is not advocating that there should be a Minimum/Maximum Sone level for 0.25 WG; we believe simply reporting the Sone Levels at 0.25 should be sufficient.

## Reporting of Watts at 0.25

As stated above, Panasonic supports the new requirement for reporting the Efficacy and Max Sound for all speeds as presented in Section 3Ab at line 95. This will help eliminate fans that are poor performers when operated at low speeds to meet the whole building ventilation requirements of ASHRAE Standard 62.2. That is the utilization that has the longest runtime and therefore the most impact on IAQ and energy.

Panasonic also notes the proposal to report Watts for ENERGY STAR certified fans at 0.25 WG has been dropped. Similar to the suggestion above, attaining energy consumption levels for ventilation products at installed levels is of importance to architects and engineers, especially as it relates to high-performance ENERGY STAR, LEED or DOE Zero Energy Ready Homes single and multifamily projects. Every manufacturer already has a test report for every fan that has the Watts at 0.25 so this would not require any new testing, just a review of existing test files. Again, since this item was not included in the ENERGY STAR V. 4.0 Draft Final Requirements, Panasonic recommends creating a similar reporting requirement of Watt Levels at 0.25, with no Min/Max, at least for the ENERGY STAR Most Efficient Category if not for all ENERGY STAR certified fans.

Thank you for the opportunity to comment on EPA's final draft for ESTAR Ventilation Requirements, Version 4.0. As always, please let us know if we may be of any further support to you and your initiatives.

Sincerely,

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