

September 6, 2016  
ENERGY STAR Most Efficient 2017  
[mostefficient@energystar.gov](mailto:mostefficient@energystar.gov)

As an ENERGY STAR award recipient the past seven years and an active supporter of the ENERGY STAR program initiatives, Panasonic is pleased to offer comments regarding the proposed criteria for the ENERGY STAR Most Efficient 2017 designation for ventilation fans.

Consistent with ENERGY STAR's objective of recognizing the top performing products available in the market, criteria for the ENERGY STAR Most Efficient designation should be both aspirational and conducive to enhanced customer satisfaction. With this in mind, Panasonic requests that EPA consider criteria enhancements to allowable sound levels and efficacy at all fan speeds. Specifically, we recommend the following enhancements:

- Lower sound levels when running fans is a key to customer satisfaction. Panasonic believes a comparison of the Most Efficient fans' sound levels would greatly enhance the Most Efficient criteria. We recommend a requirement that sound simply be reported at .25" while leaving the 0.1" minimum sound requirement in place and eliminating any minimum requirement for sound at .25". Consumers would be able to use this information to better project the actual sound output of fans installed in their homes.
- Efficacy of multi-speed fans is desirable but it appears inconsistent to require they meet the 10 CFM/W limit only at the top speeds. Some fans can meet the requirement at top speed but fail the 10 CFM/W at lower speeds. Since the continuous operation feature often involves reduced speed options that specifically meet ASHRAE 62.2 requirements, the operation at reduced speeds may represent a statistically higher usage than the high speed option that is only used during bathroom events like bathing or showering. For consistency, Panasonic recommends the CFM/W requirement be uniform for both the ENERGY STAR specifications and the ENERGY STAR Most Efficient 2017 criteria.

Should you have any questions or wish to further discuss our recommendations, please let me know. Thank you for the opportunity to comment on EPA's ENERGY STAR Most Efficient 2017 proposed criteria.

Sincerely,

Mark Sharp  
Group Manager

cc: Jim Shelton  
Ted Cater  
Russell Pope  
Abigail Daken