Hello Abigail and Jacob,

Thank you for the limited topic proposal for the ES spec v4.1. S&P USA is very concerned about the new proposal that lowers the required efficacy to meet Energy Star criteria even further than what was originally proposed. Originally inline fans had to meet a stringent, but achievable efficacy of 3.8 CFM/W for all inline fans, which was then lowered to 3.7 CFM/W for all inline fans tested with a filter. This was still achievable as seen in our certified test data. Now, EPA has proposed 2.9 CFM/W for inline fans with a MERV 13 filter, which in our opinion is far too low (24% lower), especially based on the fact that we have already achieved efficacy levels of 4.0 – 7.1 CFM/W for our newest inline fans tested with a MERV 13 filter.

We believe Energy Star certification should be a harsh but reasonable standard to achieve and should really showcase exceptional product design/function. By reducing the requirements to such levels as 2.9 CFM/W, certification will become almost automatic for products that are much lower-performing, which goes against the Energy Star core values of energy efficiency, consumer savings, and environmental protection.

S&P USA urges the EPA to reconsider the 2.9 CFM/W efficacy requirement for inline fans tested with a MERV 13 filter. Ideally, we think the standard should be kept simple and require all inline fans both with and without a filter (any filter including all MERV ratings) to meet the efficacy requirement of 3.8 CFM/W. We understand that EPA wants to give consideration to fans tested with a filter that usually experience a decrease in efficacy, so if a lower efficacy for inline fans tested with filters is necessary, we believe it should be 3.6 CFM/W for all filter types (including all MERV ratings), see below.

Product Type	Rated Airflow (CFM) Range	Minimum Efficacy Level (CFM/W)*	Maximum Allowable Sound Level (Sones)*
Bathroom and Utility Room Fans	10 to 89 CFM	2.8	2.0
	90 to 200 CFM	3.5	2.0
	201 to 500 CFM (max speed)	4.0	3.0
In-Line (Single-Port and Multi-Port) Fans	N/A	3.8	N/A
In-Line (Single-Port and Multi-Port) Fans tested with a filter in place (1≤MERV≤20)	N/A	3.6	N/A
~~In-Line (Single-Port and Multi-Port) Fans tested with a filter in place (MERV≥13)~~	~~N/A~~	~~2.9~~	~~N/A~~

Thank you very much for including the stakeholders in the standard development process. We appreciate the collaborative efforts of the EPA and look forward to your feedback on our suggestions above.

Thank you,
Matt Matheny
Project Engineer

S&P USA Ventilation Systems, LLC
6393 Powers Avenue
Jacksonville, FL 32217 USA
T. (904) 731-4711
F. (904) 737-8322
www.spvg-northamerica.com