

ENERGY STAR Ventilating Fans Version 4.1 Limited Topic Proposal Comment Matrix

Subtopic	Stakeholder Comment Summary	EPA Response
Definitions		
Product Family	One commenter supports the proposed revision to the Product Family definition.	Thank you for your comments.
Efficacy Requirements		
Supply Fans	<p>One commenter requests to change the Product Type titles in Table 2 to include 'Supply Fans' as follows:</p> <ul style="list-style-type: none"> - In-Line (Single-Port and Multi-Port) and Supply Fans tested with a filter in place (6≤MERV<13) - In-Line (Single-Port and Multi-Port) and Supply Fans tested with a filter in place (MERV≥13) <p>The commenter suggests that efficacies for other types of supply fans could be altered as necessary in the future with an interim clarification document from EPA.</p>	<p>EPA appreciates the suggestion to include supply fans in the table 2 headers. With this revision, supply fans are no longer out of scope. EPA feels that it would not make sense to include a general supply fan designation associated with in-line fans, because if a product were to be certified as a supply fan in a different configuration, it likely should meet different efficacy criteria based on differing test criteria. EPA has relaxed the stringency for in-line supply fans tested with a filter in place, but manufacturers may certify supply fans consistent with their configuration at the levels within this specification. EPA feels that the term supply fan is too general to be a stand-alone product category, but will reconsider this comment and other supply fan categories in the next major revision of the specification.</p>
Concerns about in-line fan with MERV 13+ filter	<p>One commenter states that the new proposed efficacy requirements of 2.9 cfm/W for inline fans is too low, based on testing of their inline fans that already achieve efficacy levels higher than that with MERV 13 filters in place. The stakeholder comments that lowering the efficacy level to 2.9 cfm/W will allow for much lower-performing models to be certified. They suggest that if a lower efficacy for inline fans tested with filters is necessary, it should be 3.6 CFM/W for all filter types (including all MERV ratings).</p>	<p>EPA appreciates the commenter's concern for a specification which delivers real efficiency. EPA has now had several stakeholders show a drop in efficacy of 20% to 25% when testing fans with a MERV 13 filter. Though fan models exist that meet 3.6 cfm/W with a MERV 13 filter, EPA will maintain the lower requirements based on the data received, providing customers with a wider variety of efficient fans with strong filtration. EPA plans to re-assess this level in the next full revision of the Ventilating Fan specification, which is likely to start in the year 2021.</p>
Reporting Requirements		
Support removal of mandatory reporting requirements	Two stakeholders support the removal of mandatory reporting requirements.	Thank you for your comments.
Lighting Requirements		
Support clarifications	Two stakeholders support the clarification to the Lighting Requirements, that ventilating fans that are shipped with ENERGY STAR certified lamps are exempt from In Situ Air Temperature Testing and Minimum Light Output requirements in the Luminaires specification.	Thank you for your comments.