

Vent Fan Version 4.0 Specification - Stakeholder Comments Final Draft

Topic	Comment	Draft EPA Comment Response
General		
General	One commenter is satisfied with the final draft as written.	Thank you for your comments.
Product Availability	Two commenters suggested EPA should reconsider the efficacy levels in the final draft of version 4.0 due to the smaller number of products that can meet the requirements.	EPA has performed an extensive research on product availability both online and in stores and believes that there will be sufficient product available at the ENERGY STAR version 4.0 levels.
EPACT Requirements	Three stakeholders commented that has not provided enough lead-time for stakeholders to redesign current ENERGY STAR models to meet version 4.0 requirements. One of commenters additionally posited that all manufacturers will source more efficient OEM parts from a limited number of available products. Demand may exceed supply and cause a bottleneck in product availability.	EPA decided on the Version 4.0 levels based on models currently available on the market, as is standard practice. EPA's research shows that there will be sufficient product availability when this specification takes effect without all current ENERGY STAR models being changed to meet the Version 4.0 specification. EPA provides a 9 month transition to allow for transition of collateral material vs redesign of products, which the Agency understands is a longer process.
Market Penetration	Two stakeholders commented that the market penetration of vent fans that met the version 3.2 requirements amounted to 19% of total products shipped and therefore, EPA should not proceed with the higher efficacy levels in version 4.0.	EPA no longer motivates this revision by looking at market share. The high proportion of models certified as ENERGY STAR, the excessively long period of time between version 3.0 and 4.0, and the strong opportunity for cost effective savings motivates EPA's revision. It will provide consumers with a program that effectively differentiates significantly more efficient products.
	One commenter supports the EPA's conclusion that there will be a sufficient variety of ENERGY STAR models available to consumers at the originally proposed efficacy levels.	Thank you for your comment.
QPX	One commenter suggested that the QPX system won't be in place by January 1, the first day vent fans may be certified.	Partners can certify products to Version 4.0 as soon as this specification is final even as EPA updates QPX to reflect the V4.0 requirements.
Reference Section	One stakeholder asked EPA to update the Static Pressure Reference Measurements section of the specification.	Thank you. EPA will make this correction.
Scope		
General	One commenter asks EPA to include remote mounted exterior ventilators and H/ERVs in the scope of the version 4.0 ENERGY STAR Ventilating Fans specification.	At this time, EPA has no plans to alter the scope of the ENERGY STAR residential ventilating fans specification but will consider such changes in the future.

Range Hoods		
Scope	Two stakeholders support the amended range hood scope.	Thank you for your comments.
Inline Fans		
Efficacy	Two stakeholders asked EPA to not proceed with the increased inline fan efficacy levels as proposed in the final draft of version 4.0. One pointed out that the proposed efficacy unfairly requires more of in line fans than of bathroom fans, because of the higher external static pressure during the test.	To differentiate products in the inline fan market, EPA determined that it was necessary to revise the ENERGY STAR inline fan criteria. EPA's experience has been that even such dramatic changes as these are less problematic than they seem to be.
Bathroom Fans		
Sound Requirements	One commenter suggests changes to the proposed sone levels to ensure ENERGY STAR remains a market differentiator in this product category.	Non-energy requirements in ENERGY STAR specifications ensure quality and excellent performance; the proposed sone levels align with this goal. Increasing the requirement is unnecessary, particularly considering that the difference would be virtually imperceptible to consumers.
Installation Instructions		
General	One stakeholder asks EPA to restructure the installation instructions in bulleted format.	EPA included the standard installation instructions statement based on stakeholder comments that standard language would be easy for manufacturers to include in the product literature and for auditing purposes as well.
Installed Fan Performance		
Efficacy	One stakeholder agrees with 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, EPA's direction 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. This same stakeholder believes 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.	For multi-speed fans, the installed fan performance requirement applies to only the highest speed as ducts are designed for the fan's high speed airflow, in which case high static pressure is not expected to be an issue at lower speeds. EPA did not receive substantiated claims that such conditions are commonplace in the field.
Warranty		
General	Two commenters remarked that earlier in the history of the vent fan spec, the reduced warranty requirement was approved in order to facilitate broader manufacturer participation in the new program. The same commenters opposed the reduction in the specifications because a stronger warranty would provide better assurance of quality and performance. For this revision, this commenter believes EPA should address the warranty issue in the next spec revision and increase the warranty period for ENERGY STAR certified fans.	EPA understands that consumers expect their ENERGY STAR products to not only save money but to be reliable. The proposed warranty requirements reflect the vent fan industry's average warranty. EPA is willing to consider the question of increased warranty in the next revision.

Data Reporting

Sones	<p>One stakeholder suggests creating a mandatory reporting of Sone Levels at 0.25 WG in at least the ENERGY STAR Most Efficient Category going forward.</p> <p>The same stakeholder 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.</p>	EPA will consider including these requirements in future ENERGY STAR Most Efficient vent fan criteria.
Watts	<p>One stakeholder supports the new requirement for reporting the Efficacy and Max Sound for all speeds as presented in Section 3Ab at line 95.</p> <p>The same stakeholder also notes the proposal to report Watts for ENERGY STAR certified fans at 0.25 WG has been dropped.</p>	