

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460



OFFICE OF
AIR AND RADIATION

November 30, 2010

Dear Climate Control Manufacturer or Other Interested Party:

The U.S. Environmental Protection Agency (EPA) welcomes your input on the attached Draft 1 ENERGY STAR[®] Residential Climate Controls Usability Test Method and requirements framework. Stakeholders are encouraged to attend a meeting to discuss this metric in Washington, D.C. on **December 14, 2010**, and to submit comments on this proposal to EPA no later than **January 30, 2010**.

EPA's goals for the Climate Control specification include: (1) identifying products with superior usability and (2) improving adoption rates for HVAC program schedule usage and other energy saving modes. The Draft 2, the Version 1.0 Residential Climate Controls specification includes two distinct paths to evaluate usability for ENERGY STAR qualification. Both require compliance to core prescriptive requirements. The "prescriptive" path requires compliance with secondary prescriptive usability requirements as well. The "performance-based" path allows usability testing to performance-based usability requirements in lieu of secondary prescriptive requirements. The performance-based path is designed to allow manufacturers to use innovation and creativity in complying with usability requirements.

Performance-based testing will be administered by an accredited lab, and will consist of evaluation of the Unit Under Test by a panel, selected in accordance with specific criteria. EPA is developing usability test requirements, and a Residential Climate Controls Usability Test Method which includes panel selection criteria and test procedures. This letter introduces the first draft of both the Test Method and a framework for usability requirements for devices to earn the ENERGY STAR label.

Key features of the Draft Test Method include:

- 21 member panel, specified to be representative of US demographics, as measured by the 2000 Census. Panel size balances repeatability and ease of testing.
- 6 tasks arranged in order to promote learning during the test.
- Specification of test conditions, including mounting location.
- No reference device test is required. While EPA remains interested in increasing repeatability by testing a reference device in parallel with the device under test, it is clear that development of an acceptable reference device will be challenging and will take some time. We feel that useful information can be generated by using a larger panel size instead.

Stakeholder meeting: EPA will host an ENERGY STAR Residential Climate Controls Stakeholder meeting in Washington, DC to discuss the Draft 1 Usability Test Method on Tuesday, December 14, 2010. If you would like to participate in this meeting, please RSVP by Wednesday December 1, 2010 to ClimateControls@energystar.gov with your name and contact information (specifying "in-person attendee" or "conference call attendee" in the subject line). Conference call information will be provided to attendees prior to the meeting.

The meeting will include presentation and extensive discussion of the following topics:

- Introduction of the Draft 1 Residential Climate Controls usability test requirements and test procedure, including justification and associated research.
- Structured discussion of key areas including reference device options.
- A brief update on other aspects of the Residential Climate Controls specification development process and schedule.
- Identification of areas where additional discussion and stakeholder feedback is needed.

A detailed agenda will be shared with attendees prior to the meeting. A full-day meeting is planned, which EPA intends to allow for up to four stakeholder presentations of data and supporting information in response to the Draft 1.0 Residential Climate Controls Usability Test Method. If your company/organization is interested in presenting, please indicate this request, along with the intended topic, in your meeting RSVP. EPA will review all requests received by December 7 and select four presenters based on the intention of covering a diverse mix of topics and viewpoints.

The meeting will be held from 9:00 a.m. – 5:00 p.m. at the ICF International office located at 1725 Eye St. NW, Washington, DC 20006 (Concourse Conference Room).

Test Method Validation

In the upcoming months, EPA will investigate the repeatability of the Draft 1 Usability Test Method through a series of test run in several different locations on several different devices. More information about this investigation will be available at the stakeholder meeting. We welcome the participation of all stakeholders in this effort.

Comment Submittal

Stakeholder input is an important part of this ENERGY STAR specification development process. All interested parties are encouraged to submit comments on the Draft 1 Test Method and on the requirements framework no later than **January 30, 2011** to ClimateControls@energystar.gov. When addressing specific text within the test method, comments should include reference to the appropriate line numbers of the subject text.

Written comments will be posted to the ENERGY STAR Residential Climate Controls specification development Web site unless the submitter requests otherwise. All specification development materials can be found on the ENERGY STAR Climate Controls Web site at www.energystar.gov/newspecs.

EPA appreciates the feedback received thus during the development of the ENERGY STAR Residential Climate Controls specification and this associated Test Method. We look forward to continuing our productive partnerships. If you have any questions regarding EPA's proposal, please feel free to contact me at daken.abigail@epa.gov and (202) 343-9375, or Doug Frazee, ICF International, at dfrazee@icfi.com and (410) 279-1093.

Sincerely,



Abigail Daken
U.S. Environmental Protection Agency
Climate Protection Partnerships Division
ENERGY STAR Program