
From: Orris, Tim (AMCA International, Inc.)
Sent: Thursday, August 31, 2006 12:25 PM
Subject: Energy Star Residential Ventilation Program Requirements

Erin,

AMCA International's position is that Energy Stars proposal is unacceptable.

Our major objection to your program is the method you are requiring for sound values. The correlated values between the AMCA sones and HVI sones should either be included in the program or all sound requirements should be eliminated. AMCA's sone calculations use an American National Standard (ANSI) approved method while the HVI method does not. At a minimum, the EPA should be using ANSI approved standards. If the AMCA method for calculating sones is not to be included, all sound values should be eliminated from the program, as it has no effect on energy consumed by the fan. It's true that it's an attribute of the fan, but it's more akin to an appearance attribute than performance.

By retaining the program as you propose, an AMCA member with products certified for air & sound would not qualify for the program but an HVI member would. This is unjustified and may qualify as restraint of trade. We do not feel that any valid reason has been given by either Energy Star or the EPA as to why our members who manufacture residential products are not being allowed to participate fully in your program.

Sincerely,

Timothy J. Orris
Director of Technical Services
Air Movement & Control Association International
30 West University Drive
Arlington Heights, IL 60004
847 394-0150 phone
847 253-0088 fax
torris@amca.org
www.amca.org

Save the dates October 20-23, 2006
51st Annual Meeting at the Four Seasons Resort, Santa Barbara, CA

Disclaimer:

You are receiving this e-mail in strict compliance with the new Federal Laws concerning e-mail. To be removed from this mailing list, please respond to remove@amca.org and you will be promptly removed from our mailing list.

Air Movement and Control Association International, Inc.