



Fantech

Your Ventilation Solutions Company

1712 Northgate Blvd. • Sarasota, Florida 34234

Phone: 941-309-6000; (800) 747-1762

Fax: 941-309-6099; (800) 487-9915

www.fantech.net

September 13, 2006

Ms. Erin Trager
ICF International
1725 Eye Street NW, Suite 1000
Washington, DC 20006

Dear Ms. Trager

Thank you, for the opportunity to respond to the proposed change to the Energy Star Program Requirements for Residential Ventilating Fans. The stated reason for adding AMCA 210 and 211 is to "allow greater flexibility for manufacturers in testing their products for Energy Star qualification without compromising the quality or comparability of the test results".

Currently HVI certified products can be tested at one of two laboratory facilities. These two facilities are, AMCA Laboratory and Texas Engineering Experimental Station (TEES)-Energy Systems Laboratory. AMCA certified products can be tested at the AMCA Laboratory or any AMCA accredited laboratory. Many manufacturers of ventilation products, including our company, have AMCA accredited laboratories. This allows manufacturers to self certify their ventilation products with only a sampling of the AMCA certified models being tested by AMCA. AMCA's method of certification appears to have a greater potential for compromising the quality of the test results than the method that Energy Star currently endorses. In the case of our company we choose to use AMCA certification for our larger products that are designed for the commercial and industrial markets. When we chose to use AMCA certification we do conduct our own air and sound testing at our AMCA accredited laboratory. For our products that address the residential market we chose to use HVI certification because it is more widely accepted and trusted in this market.

HVI requires the tested air flow results be rounded down to the nearest 10 cfm. This rounding occurs at 0.2" w.g. static pressure for in-line fans and at 0.1" w.g. static pressure for bathroom/utility room fans and range hood fans. The air curve for these products is to then be normalized based on the rounded down CFM value at the product's rating point. This normalized curve has an impact on the Energy Star airflow requirements at 0.25 in w.g. static pressure for Bathroom and Utility room fans. AMCA certification procedures do allow you to certify lower cfm values than the actual test results but they do not require rounding down or normalizing of the airflow curve. This results in a situation where a tested product could be rated at two different cfm values at the same static pressure depending if it was HVI or AMCA certified. These dual rating methods will likely result in consumer confusion and mistrust in the published values. Additionally, allowing the AMCA rating method with does not include rounding down the cfm will effectively lower the Energy Star requirements for cfm/Watt.

Thank you,

Gary Crow
Engineering Manager
Fantech Inc.