



HOME VENTILATING INSTITUTE

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Ms. Erin Trager
ICF International
1725 I (Eye) St. NW, Suite 1000
Washington, DC 20006

Dear Ms. Trager,

As EnergyStar partners, several HVI Members received your request for comments on Version 2.1 of the EnergyStar program for Residential Ventilating Fans. We have been asked by our Members to comment on the proposal.

HVI Publication 915 and 916 are the procedures for testing for sound and airflow and HVI Publication 920 is the procedure for Certification, Verification, and Challenge currently referred to in the EnergyStar Residential Ventilating fan program.

HVI procedures are specifically designed to ensure that any type of consumer can easily distinguish the HVI Certified performance of the product. The performance (air and sound) ratings, although complex and carefully derived, are therefore distilled down to a few numbers understandable by most levels of Customers, allowing Customers to compare products without knowing details about how the manufacturer chose to test its product.

At this stage EnergyStar is suggesting to include AMCA Standard 210/211 as an option to HVI Publication 916 for rating fans for airflow. Although HVI Publication 916 refers to AMCA 210, there are important differences between the programs, both technically and in procedure. We would like to point out the more significant differences:

Procedural differences between HVI and AMCA procedures:

- HVI specifies independent labs for testing each and every product model, whereas AMCA allows manufacturers with AMCA accredited laboratories to test their own products and self-certify the performance. AMCA then asks the manufacturer for a sample of one model of the fan in a series of models and verifies that the performance of that one model is within tolerance. This means a 150 cfm fan might be the only one verified to “show” compliance for a 50, 80, or 100 cfm fan. This is misleading for the consumer.
- In Verification, AMCA requests the manufacturer to supply a product sample for testing, allowing the manufacturer to choose the sample. HVI staff buys the product in the market place and has it tested at Texas A&M. Having manufacturers supply products for verification lends little credibility to the program for this type of product.
- HVI certifies the performance of the fan whereas AMCA licenses the right to the manufacturer put the AMCA Certified Air Performance label on the fan.

- HVI 920 includes a Challenge process where a member manufacturer can challenge the performance claims of a competitor and HVI will have the product independently tested. If the product does not meet the claims, the manufacturer is required to fix or withdraw the product.

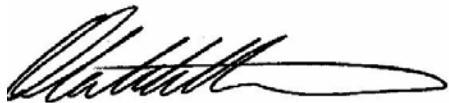
Technical differences between AMCA and HVI air performance ratings:

- HVI specifies exactly how a fan is to be tested whereas AMCA Standards give several options for how to set the test up. Although the option chosen has to be specified with the publicized performance data, consumers have little understanding of the differences between the various setups.
- HVI specifies for the performance rating to be reduced to the nearest 10 cfm, and other publicized performance numbers to be reduced correspondingly. AMCA allows the manufacturer to use the test performance numbers, giving a false impression of added precision and performance. HVI Certified air performance is therefore generally slightly more conservative for a given fan.

Each one of the above listed differences between the AMCA and HVI programs are significant. HVI Certified products are highly recognized and trusted by Code Officials, Installers, Builders, and end users, whereas AMCA Certified Ratings are more recognized by Engineers for the commercial and industrial market. Several manufacturers, including EnergyStar partners, are therefore members of both associations, recognizing the need for, and differences between, the two systems. It is not prudent to regard AMCA Air Performance Licensing as equivalent to HVI Certified Air Performance.

These comments only address the procedural and technical differences between the AMCA and HVI programs for air performance. The results obtained from testing with the two different programs are simply not comparable. The differences between the sound performance programs are greater and the derived numbers are also not comparable. In case EnergyStar considers including AMCA Sound Performance Ratings as an alternative to products with sound performance Certified by HVI, we would welcome the opportunity to comment on the technical difference prior to the writing of the proposal.

We look forward to your reply.



With best regards,

Ola Wettergren
Chairman of HVI

CC: HVI Board of Directors