

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



OFFICE OF  
AIR AND RADIATION

September 10, 2008

Dear ENERGY STAR<sup>®</sup> Ventilating Fan Partner or Other Interested Stakeholder:

The U.S. Environmental Protection Agency (EPA) is requesting feedback on the attached Draft 1 Version 2.1 ENERGY STAR Ventilating Fan specification **by October 1, 2008**. This document is being revised largely in response to concerns regarding current testing and certification requirements. It is EPA's intention that this revision will permit greater inclusivity of models available in the marketplace, encourage fair competition, and give partners greater flexibility in testing their products for ENERGY STAR qualification, without compromising the quality or comparability of the test results.

EPA has spent the last several months reviewing the Home Ventilating Institute's (HVI) and the Air Movement and Control Association's (AMCA) test standards and procedures and speaking with representatives of these organizations. Based on this research, the following key changes are now being proposed in this Draft 1 document related to product testing:

- In order to increase flexibility in terms of where partners have their fans tested, while maintaining the consistency of submitted data, EPA is proposing to replace the certification requirement previously included in Section 4 of the specification with a requirement that testing be done in accordance with ANSI/ASHRAE Standard 51-07 ANSI/AMCA Standard 210-07 (airflow) and ANSI/AMCA Standard 300-08 (sound), and fan testing setup in accordance with HVI 916 (airflow) and 915 (sound). Also, as ANSI/AMCA Standard 300-08 applies specifically to sound *testing*, this revision prescribes sound *rating* in accordance with HVI 915, which rates sound according to spherical sone values. For fan airflow, this revision requires that this figure be rounded to the nearest whole cfm (cubic foot per minute).
- In lieu of the certification requirement, EPA will ensure the integrity of the ENERGY STAR label on ventilating fans consistent with its broader program integrity efforts. These include systematic review of qualifying product information submitted by manufacturers, logo-use monitoring, periodic verification testing and collaboration with third-party certification programs.
- EPA is considering including a requirement that will ensure that all labs testing ventilating fans for the purposes of ENERGY STAR qualification follow certain accepted testing and calibration procedures that render their results reliable, and allow comparison of results independent of the labs that perform the testing. Stakeholders are encouraged to provide suggestions regarding this potential new requirement.
- EPA hopes to collaborate with HVI and AMCA to leverage their third party certification programs to verify the performance of products. Assuming EPA can work out such an arrangement, products certified through these programs would be significantly lower in priority for verification testing by EPA. In the future, manufacturers may be required to have independent testing performed on a select number of products each year if they choose not to participate in or share their results from third-party verification testing. As always, EPA maintains the ability to follow-up on information received about potential non-compliance and to take appropriate action.

In addition, please note that the attached Version 2.1 specification incorporates LED light engine test procedures which were distributed by email to stakeholders on June 2, 2008, effective immediately, and have been added to the specification to allow the qualification of ventilating fans employing LED light engines for primary illumination. These test procedures have been added in response to: inquiries from manufacturing and retail Partners about how to qualify LED-based general illumination products within our existing programs; the introduction of new test procedures that make testing possible for this new set of fixture types; and, our ongoing need to remain technology-neutral and allow new technologies to compete with existing technologies on a level playing field.

Stakeholders are encouraged to review the attached Draft 1 Version 2.1 specification and provide comments to Josh Forgotson, ICF International, at [jforgotson@icfi.com](mailto:jforgotson@icfi.com) **no later than Wednesday, October 1, 2008**. It is EPA's intention to finalize this specification over the next few weeks at which time it would become effective immediately.

Thank you for your continued support of the ENERGY STAR program. If you have any questions regarding the LED light engine test procedure requirements, please contact Alex Baker at [baker.alex@epa.gov](mailto:baker.alex@epa.gov) or (202) 343-9272. For all other questions or concerns, please feel free to contact me at [fanara.andrew@epa.gov](mailto:fanara.andrew@epa.gov) or (206) 553-6377.

Sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Fanara', with a long horizontal stroke extending to the right.

Andrew Fanara, EPA  
ENERGY STAR Product Manager