



MEMORANDUM

To: DOE Office of General Counsel

From: Tony Bacon

Date: August 6, 2015

Re: Ex Parte Communication Memo

This memo provides a summary of the communications made to the DOE staff regarding proposed rules on ceiling fan test procedures as well as proposed energy efficiency rules for ceiling fan light kits. The communications occurred during a teleconference on July 30, 2015.

The meeting attendees included:

Lucy Debutts (DOE)

Ashley Armstrong (DOE)

David Turner (Hunter Fan Company)

Tony Bacon (Hunter Fan Company)

Summary of Issues Discussed

1. False Ceiling v. Actual Ceiling Test Data

Hunter inquired whether any further DOE testing was conducted before the DOE changed the proposed ceiling fan test procedure to include mounting the ceiling fan to an actual ceiling versus a false ceiling. The DOE indicated that they did not believe any detailed testing was conducted.

Hunter pointed out that the test data provided by Big Ass Fans ("BAF") appears contradictory to the general industry belief. This test data appears to be the test data that the DOE relied on to make its decision. The BAF test data indicates that mounting fans directly to the ceiling versus the current Energy Star test setup will provide an increased CFM in three out of four fan tests. In the same submittal, BAF indicates that there should be decrease when a fan is mounted to a ceiling. Yet the BAF test results indicate that there is an increase. Hunter recommends that the DOE either conduct its own testing or verify the BAF test results.



2. Ceiling Fan Efficiency

Hunter expressed concern that the ceiling fan efficiency calculation still utilizes a ratio of 4.2 hours for high speed and 2.2 for low speed.

The ceiling fan industry, via the American Lighting Association, submitted two comprehensive reports with survey evidence that indicates that the high speed fan setting is the least used by consumers. Consequently, Hunter believes that the ceiling fan efficiency calculation should be updated to reflect a ratio more representative of actual consumer use.

3. FTC Label

Hunter inquired whether the DOE is coordinating its ceiling fan test procedure rules with the FTC in regard to the FTC energy label requirements for ceiling fans.

Without a coordinated effort, ceiling fan manufacturers would be in a difficult position of being required to follow the new ceiling fan test procedure while not knowing how the FTC would like the new test results conveyed to consumers.

4. Efficiency Formula for CFLK's

Hunter asked the DOE for clarification regarding the efficiency formula for CFLK's. The DOE indicated that the reference to lumens in the formula was in regard to the source and not the luminaire in most cases.