**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*  
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Section C.x.11 Indoor Fan Energy makes it sound like operational flow rate and fan power are always measured. The language should be clarified to indicate that measured values are not required.

In addition, when fan power is not measured, ANSI 301 states to use Grade 3 = 0.58 W/cfm (a highly penalizing value). Since Appendix C introduces a new optional Minimum Rated Feature for Fan Motor Type, it would make sense to offer a different Grade 3 value if the fan motor is known to be more efficient (i.e., BPM). This would ensure that higher efficiency products (particularly, variable speed systems which always (?) have BPM fans) are not excessively penalized when fan power is not measured.

**Proposed Change to the Draft Standard\***  
*Use “strikethrough” and “underline” formatting to indicate all proposed changes. Changes must be shown with “hard-formatting” strikethrough and underline, not “track changes”.*

*Use a color other than red to indicate proposed changes to the draft.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

The measured operational flow rate, Vop,measured, and fan power, Pfan,op,measured, ~~shall~~ may be measured at a known mode (htg/clg) and compressor speed, i, according to RESNET/ACCA 310.

(Also update all references to 0.58 W/cfm to provide an alternative W/cfm to be used when the fan motor type is BPM. Ideally the W/cfm would be located only in Appendix C and referenced from elsewhere.)