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HVAC FDD certification requirements

Dear Madam or Sir:

Thank you for your open process which provides the opportunity to comment.

Under 401.2.2.10 [New Section] HVAC Fault Detection and Diagnostics (FDD) we find reference to test requirements for DX, AHU and Terminal Units when equipped with FDD:

403.2.3.5.1.11- Fault detection and diagnostics (FDD) for packaged direct expansion units shall be tested in accordance with NA7.5.11. (Fault Detection and Diagnostics (FDD) for Packaged Direct Expansion Units)
403.2.3.5.1.12- Automatic fault detection and diagnostics (FDD) for air handling units and zone terminal units shall be tested in accordance with NA7.5.12 (Automatic Fault Detection and Diagnostics (FDD) for Air Handling Units and Zone Terminal Units.)

In the Pre-Rulemaking Draft Regulatory Text for the 2028 Reference Appendices, Section JA6 HVAC System Fault Detection and Diagnostic Technology includes subsection JA6.3 Economizer Fault Detection and Diagnostics Certification Submittal Requirements, in which Declaration and Certification requirements and procedures are defined.

Similarly, JA17 â€“ Qualification Requirements for Ventilation System Fault Indication Displays (FIDs) contains Certification requirements in JA17.5 Manufacturer Certification. Both of these certification requirements exist in the 2025 code.

However, NA 7.5.11 or NA7.5.12 do not contain comparable Declaration and Certification requirements and procedures or requirements. Is this intentional?