

## DOCKETED

<b>Docket Number:</b>	17-AAER-01
<b>Project Title:</b>	Appliance Efficiency Pre-Rulemaking for Commercial Tumble Dryers and Air Filter Labeling
<b>TN #:</b>	220872
<b>Document Title:</b>	3M Comments for CA Air Filter Labeling (8-24-2017)
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	John Zhang
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	8/24/2017 9:48:44 AM
<b>Docketed Date:</b>	8/24/2017

*Comment Received From: John Zhang*

*Submitted On: 8/24/2017*

*Docket Number: 17-AAER-01*

**3M Comments for CA Air Filter Labeling (8-24-2017)**

See attachment

*Additional submitted attachment is included below.*

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**3M Comments for California Energy Commission's Air Filter Labeling Proposal**  
Docket # 17-AAER-01, 2017 Appliance Efficiency Pre-Rulemaking

August 24, 2017

Dear California Energy Commission:

Thank you for offering us the opportunity to provide comments to the Air Filter Labeling proposal by California Energy Commission. We carefully reviewed the labeling proposal and would like to provide the following comment for your consideration.

**Filter Size**

In the current version of the test method, it is recommended that “only each basic model of an air filter to be tested. To best align with the test procedures, the tested filter shall be as close as possible to 24 inches wide by 24 inches long.” Since in residential HVAC systems 20 inches x 25 inches is one of the most common sizes, we would like to recommend the 20 in x 25 in filter as the basic model for testing of all filters or be called out as a reasonable option to the 24 in. x 24 in. filter. In this way, the test method will be very clear for everyone.

Sincerely yours,



John Zhang



Bryan Gerhardt

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