

DOCKETED

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From: Nance, Nathaniel <nnance@aafintl.com>
Sent: Friday, November 18, 2016 12:42 PM
To: Energy - Appliances
Subject: Title 20 Air Filter Labeling Questions
Attachments: IMG_3225.jpg; IMG_3223.jpg

Bruce Helft,

Bruce to continue our discussion that we had earlier today. There are several questions AAF Flanders have in regards to compliance.

1. The filters that need to be labeled are “residential” new construction filters. To make sure we cover all the filters applicable could you please define what new buildings are defined as residential?
2. Do we have to include any Spanish translations on the filter label for this requirement?
3. What is defined as “small/medium/large” filter tests for generation of test numbers? I have attached pictures of a standard test duct. As you can see it is a linear duct with space for a 24x24 nominal filter. We typically can reduce to other sizes or 20x20 for residential. All other marketing/test information on pressure drop is back calculated using filter size with the understanding that the flow in the test duct is laminar. We need clarification on this as it is apparent by competitor markings they are doing the calculation method. Also the efficiency is only ran at the largest size and the data is transferred to all sizes. All this needs clarification.
4. What is the timeline for enforcement for this regulation? Our proposal would be end of 2017. The reasons behind this are:
 - a. Testing-until we get a clarification of what is small/medium/large and impacted filters we will not know if we have to test 100 items, 500 items, 85000 items(all potential items).
 - b. We need an understanding of what products are impacted.
 - c. Based on the amount of tests needed and products effected it could be 3-6 months to get the test results(barring the answer is not all items need to be tested).
 - d. Based on die cut print plates it could be 2-4 months after testing to get all print plates redesigned.
 - e. The cost of inventory is approx. \$2.3M and is on a 90-120 day rotation.
 - f. Filter stocking in a store is at least that timeline.

Our goal is to be in compliance with this standard as quickly as possible, but even based on critical path we couldn't comply on our filters in a shorter time than 300 days from now. We are more than willing to continue this conversation in person if you find that valuable. We hope that you take this into account when you work out the small details of this additional regulation.

We greatly appreciate your timely response and direction,

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