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Broan comments on AHAM Range Hood Certification Application

Broan-NuTone is a leading manufacturer of residential ventilation including range hoods, ventilation fans and H/ERVs based in Hartford, Wisconsin. Most of our products are also manufactured in Wisconsin.

Broan-NuTone respectfully requests that the California Energy Commission decline AHAM's request to become a certified range hood directory. We support HVI as the single source for certification for the following reasons:

- * Allowing a second directory could open the door to future divergent procedures which would cause significant confusion in the industry, including for consumers and very importantly - ASHRAE 62.2.
- * Recognizing the current testing backlog, we feel confident HVI will be able to work with REEL to add capacity (which REEL is currently doing) as well as add more certified labs.
- * The current backlog is largely due to new Title 24 requirements. Once this "pig in the python" runs its course - and we request that the CEC agree with an enforcement delay - lab availability will return to acceptable levels.

Thank you for the opportunity to comment.