

**DOCKETED**

<b>Docket Number:</b>	19-BSTD-10
<b>Project Title:</b>	AHAM Kitchen Range Hood Directory Approval
<b>TN #:</b>	232038
<b>Document Title:</b>	FOTILE Comments - Opposed to recent AHAM news for alternative certification process for CA
<b>Description:</b>	N/A
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<b>Organization:</b>	FOTILE
<b>Submitter Role:</b>	Public
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*Comment Received From: FOTILE*  
*Submitted On: 2/14/2020*  
*Docket Number: 19-BSTD-10*

## **Opposed to recent AHAM news for alternative certification process for CA**

Mr. Peter Strait  
Supervisor, Building Standards Office  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Dear Mr. Strait:

We are writing to inform you that FOTILE is not in agreement with the recent news about AHAM looking to create an alternative certification program for demonstrating range hood performance compliance with the 2019 California Building Energy Efficiency Standards.

We are not in agreement with this for the following reasons:

• FOTILE America (a subsidiary of Ningbo FOTILE Overseas Kitchen Appliance Co.) operates a sales and marketing office in Rancho Cucamonga CA. This office is responsible for all West Coast sales of FOTILE Range Hoods and appliances.

• We are strongly opposed to the formation of alternative directories, because there is no reliable process to ensure that ratings and test procedures will not diverge in the future.

• If CEC recognizes an additional directory that has a framework to establish different procedures, manufacturers will naturally migrate to the one that produces more favorable ratings. This would represent a disservice and an inequality to both consumers and to scrupulous manufacturers.

• We are aware of the testing backlog at HVI's primary third-party laboratory, REEL, and are supportive of HVI's diligent efforts to get more labs approved for product testing as soon as possible

• What the industry needs is greater capacity from more HVI-designated laboratories to ensure that all labs are held to the same level of stringency

• We encourage manufacturers of unlisted products to list their products with HVI, and we support an extension of the deadline for enforcement of the Title 24 range hood provisions for a reasonable amount of time to allow these manufacturers to continue to sell their products in California and to foster open competition that is beneficial to both consumers and industry

• We support HVI's fair and equitable treatment of manufacturers and candidate laboratories,

and we encourage CEC to continue to support the ASHRAE 62.2-recognized rating program moving forward.

â€¢ We support the HVI-Certified Products Directory as the single resource for residential ventilating product certification and oppose any alternative directories.

We hope this can be resolved shortly to eliminate confusion in the marketplace so consumers and builders can make smart accurate choices for their Kitchen ventilation needs.

Thank you for your time, support, and consideration.

Regards,

Product Engineering Team  
Ningbo FOTILE Overseas Kitchen Appliance Co

*Additional submitted attachment is included below.*

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# FOTILE

NINGBO FOTILE OVERSEAS KITCHEN APPLIANCE CO., LTD

Add: No.218 Binhai 2nd Road, Hangzhou Bay New District, Ningbo, China

F: +86-574-23456313 T: +86-574-23456321 WWW.FOTILEGLOBAL.COM

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Product Engineering Team  
Ningbo FOTILE Overseas Kitchen Appliance Co

No.218 Binhai 2nd Road, Hangzhou Bay New District, Ningbo, China (315336)

Tel: +86-574-23456368 Fax: +86-574-23456313

[WWW.FOTILEGLOBAL.COM](http://WWW.FOTILEGLOBAL.COM) email: [jiangyi@fotile.com](mailto:jiangyi@fotile.com)

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NINGBO FOTILE OVERSEAS KITCHEN APPLIANCE CO., LTD

Add: No.218 Binhai 2nd Road, Hangzhou Bay New District, Ningbo, China

F: +86-574-23456313 T: +86-574-23456321 WWW.FOTILEGLOBAL.COM

No.218 Binhai 2nd Road, Hangzhou Bay New District, Ningbo, China (315336)

Tel: +86-574-23456368 Fax: +86-574-23456313

[WWW.FOTILEGLOBAL.COM](http://WWW.FOTILEGLOBAL.COM) email: [jiangyi@fotile.com](mailto:jiangyi@fotile.com)