

**DOCKETED**

<b>Docket Number:</b>	19-BSTD-10
<b>Project Title:</b>	AHAM Kitchen Range Hood Directory Approval
<b>TN #:</b>	232063
<b>Document Title:</b>	SystemairFantech Comments - Recommend against approval of AHAM product directory as an alternative to the HVI Product Directory for kitchen range hoods
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*Comment Received From: Systemair/Fantech*  
*Submitted On: 2/17/2020*  
*Docket Number: 19-BSTD-10*

**Recommend against approval of AHAM product directory as an alternative to the HVI Product Directory for kitchen range hoods**

*Additional submitted attachment is included below.*



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

Re: Docket No. 19-BSTD-10, Application for Approval of AHAM Product Directory for use in place of HVI Directory for Kitchen Range Hoods

Lenexa, February 17, 2020

Dear Mr. Strait:

I am writing to recommend that CEC reject AHAM's application. Systemair, with brand names Systemair and Fantech is a member of HVI, AMCA, and AHRI, and active in the development of Certification programs, Codes, and Standards. Fantech was previously also a member of AHAM.

Systemair manufactures fans and air handling units, including H/ERVs for commercial and residential applications. Systemair and Fantech products are sold throughout the world, with North American products mostly manufactured in North America.

Systemair is active in HVI's Certification program, as well as in AMCA's and AHRI's certification programs, and are intimately familiar with the HVI processes. Further, we support the HVI program through participation in committees where the program is continually refined to meet current demands.

HVI's Certification program and the HVI Label are very well recognized in the residential market, including multi-family housing. A majority of residential ventilation products sold in the market carry performance Certification by HVI. HVI-Certified Products Directory is the single resource for residential ventilating product certification listings. The fact that code officials have learned to look for the HVI Label, and look in the HVI Certified Products Directory, enforces the use of residential ventilation products with performance certification throughout the US and Canada. For 65 years HVI has continually refined its Certification program, including Verification and Challenge procedures.

Adding a competing certification program will add confusion in the market place. It is highly likely that differences will develop between the certification programs over time. It is further likely that some markets will only accept one certification program or the other, thereby adding cost to consumers by requiring manufacturers to carry double performance certifications.

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A large number of additional range hood manufacturers currently require HVI performance certification for their products. This is caused by more codes & standards, including CEC requiring third party performance certification. Systemair supports this development as it serves to eliminate products with false performance claims in the market. The temporary backlog in the testing labs will be resolved in the near future as the currently accredited labs add capacity, and HVI adds more accredited testing facilities with the same level of stringency as the current HVI accredited testing facilities. We therefore do not judge this temporary situation as being a justification for California accepting a competing performance certification program.

We encourage manufacturers of unlisted products to list their products with HVI, and we support the by HVI requested 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.

Sincerely,  
Ola Wettergren,  
Business Development Director

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