

DOCKETED

Docket Number:	19-BSTD-10
Project Title:	AHAM Kitchen Range Hood Directory Approval
TN #:	232061
Document Title:	Venmar Ventilation ULC Comments - Comment on AHAM Kitchen Range Hood Directory Approval
Description:	N/A
Filer:	System
Organization:	Venmar Ventilation ULC
Submitter Role:	Other Interested Person
Submission Date:	2/17/2020 2:19:13 PM
Docketed Date:	2/18/2020

Comment Received From: Venmar Ventilation ULC
Submitted On: 2/17/2020
Docket Number: 19-BSTD-10

Comment on AHAM Kitchen Range Hood Directory Approval

see document in attachment

Additional submitted attachment is included below.



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Monday February 17, 2020

Mr. Peter Strait
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Comments on AHAM Kitchen Range Hood Directory Approval

Venmar Ventilation ULC is an HVI Member and manufacture rangehoods for US and California markets that are sold under different brands.

We are strongly opposed to the formation of alternative directories, especially 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 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. In addition to this effort, we believe that the recognition of the HVI 903 First Party Lab program by CEC would help to spread the testing load among more laboratories and would shorten the industry compliance delay to future regulation changes as well.

We question the capability from AHAM chosen lab to provide consistent results for both airflow and sounds considering round robin testing done in the past that produced different results for airflow and low sound level than AMCA and REEL laboratories.

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.

AHAM proposes to source product for verification testing from the manufacturer's factory, introducing the opportunity for abuse and gaming. We believe that HVI Verification program based on retail-sourcing of product for verification testing is better for the consumer and

CEC. Retail sourcing ensures that manufacturers do not have the ability to manipulate the product in any way prior to testing and provides for greater confidence in the results. This is especially the case for something like sound rating which couldn't be measured during field commissioning inspection by HERS raters.

We support the HVI-Certified Products Directory as the single resource for residential ventilating product certification and oppose any alternative directories for reasons such as mentioned above.

A handwritten signature in black ink that reads "Loïc Arès".

Loïc Arès, P. Eng. / Technical Advisor IAQ

Venmar Ventilation ULC