

**DOCKETED**

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## **Panasonic Position**

Panasonic is strongly opposed to the formation of alternative directories. Since 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

â€¢ 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. I have spoken with the lab and they are aggressively pursuing resolution to the influx of testing.

â€¢ 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.

â€¢ 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.

â€¢ 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 at the single resource for residential ventilating product certification and oppose any alternative directories.

As we evolve to more stringent requirements that will benefit consumers as a priority over corporate initiatives, we kindly ask that California places the needs of the consumer as its first priority.

Respectfully,

Russell Pope