

## DOCKETED

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<b>Project Title:</b>	Residential Lavatory Faucets and Showerheads
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*Comment Received From: David Farley*

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## **15-AAER-05 Consideration of Filtered Showerheads**

I am President and CEO of Sprite Industries, Inc., located in Corona, California. We are a 42 year-old manufacturer of NSF Certified Filtered Shower Products including Filtered Shower Heads. I am also the Chairman for the NSF Advisory Board which established and oversees NSF Shower Filtration Standard 177. Our filtered shower products are sold nationwide at all leading retail outlets, including, Lowes, The Home Depot, Bed Bath & Beyond, Menards, Orchard, etc.

As our shower heads contain filtration media internally, the pressure and water flow characteristics are different than those found in non-filtered shower heads. We fully support and can meet the initial flow reduction portion of 15-AAER-05 (Residential Lavatory Faucets and Showerheads) to not exceed 2.0gpm at 80 psi. The problem lies in the secondary lower minimum flow rate-to-psi ratio requirements of:

- 60 percent of the maximum flow rate at 20 psi

and

- 75 percent of the maximum flow rate at 45 psi

I do not believe the standard has considered the Filtered Shower Head Category when creating the secondary PSI-to-GPM requirements. The filtration media within the filtered shower head lowers the GPM more than a non-filtered shower head, at the same PSI. Therefore, I respectfully ask to have the secondary lower flow rates requirements at 20psi and 45psi waived for filtered shower head products.

The outcome of this matter will not only have a major impact on the sales of our products but also on the future of my Company. I realize I may be "late to the game" but ask for your assistance and advise on how to proceed. Please let me know if you have any questions or comments. I look forward to having the opportunity to discuss this matter further and sincerely appreciate your kind consideration.

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