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International Window Film Association Comments on the Draft Title 24, Part 6 Standards

Additional submitted attachment is included below.



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International Window Film Comments on the Draft Title 24, Part 6 Standards

The International Window Film Association (IWFA) is a unified industry body of window film dealers, distributors, and manufacturers that has been the third-party industry source for accurate technical information on window film products and its uses for several decades. IWFA appreciates the opportunity to provide input on the 2019 Standards Rulemaking.

IWFA would like to request that CEC staff update Residential Appendix 4.2.2.3 (f) and Nonresidential Appendix 7.4.2.2 (g) to reflect the updated publication date of the Visual Quality Standards for Applied Window Film. The date is currently listed as May 15, 1999 and should be changed to January 1, 2015. The most recent version, dated January 1, 2015, is attached for reference.

Respectfully Submitted,


Darrell L. Smith

Executive Director

Visual Quality Standard for Applied Window Film

As adopted by the IWFA May 15, 1999*

Re-endorsed January 1, 2015

1. Installed film on flat glass surfaces is not expected to have the same level of visual quality as glass. The following criteria apply to the installed film only and not to any defect inherent in the glass.
2. Installed film has a discrete time for full adhesion to be effected since installation utilizes a detergent solution in the water to float the film onto the glass: The excess water is squeegeed out, but inevitably residual water will remain between the film and glass. The time to achieve full adhesion is often referred to as "the adhesive cure time". Adhesion will be increasing from a lower value during this time. Visual and adhesive cure time is related to thickness of the film and various metallic coating on the film. Typical visual cure times may be extended or shortened according to climatic conditions.
3. Inspection for optical quality can be made before full visual cure is attained. Table 1 provides a guide for typical visual cure times. It should be noted that effects during cure, such as water bubbles, water distortion, and water haze are not to be regarded as defects.
4. The glass with applied film shall be viewed at right angles to the glass from the room side, at a distance of not less than 6 feet (2 meters). Viewing shall be carried out in natural daylight, not in direct sunlight, and shall assess the normal vision area with the exception of a 2 inch (50mm) wide band around the perimeter of the unit.
5. The installation shall be deemed acceptable if all of the following are unobtrusive (effects during visual cure should be disregarded): Dirt Particles, Hair and Fibers, Adhesive Gels, Fingerprints, Air Bubbles, Water Haze, Scores and Scratches, Film Distortion, Creases, Edge lift, nicks and tears.

Inspection may be made within 1 day of installation. Obtrusiveness of blemishes shall be judged by looking through the film installation under lighting conditions described in 4.
6. The 2 inch (50mm) wide band around the perimeter shall be assessed by a similar procedure to that in 3 and 4, but a small number of particles is considered acceptable where poor frame condition mitigates against the high quality standards normally achieved.
7. Edge gaps will normally be 1/32 – 1/16 inch (1-4mm). This allows for the water used in the installation to be squeegeed out. This ensures that film edges are not raised up by contact with the frame margin. Contact with the frame margin could lead to peeling of the film.
8. For thicker safety films the edge gaps will normally be 1/32 – 1/16 inch (1-4mm), with 1/32-1/8 inch (1-5mm) being acceptable for films of ≥ 7 mil (175 μ). Combination solar control safety films will also fall within this standard.

An edge gap of up to 1/16 inch (2mm) is recommended, especially for darker (tinted, metalized, tinted/metalized and sputtered) films, to minimize the light line around the edge of the installed film.
9. Splicing of films is necessary when larger panels of glass are treated, where both length and width of the glass exceed the maximum width of film. The splice line itself should not be viewed as a defect. This line should be straight and should be parallel to one edge of the frame margin. The two pieces of film may be butt jointed. The maximum gap at any point in the splice line should be 1/64 inch (1mm). Film may be overlapped, spliced or butt jointed.
10. Certain films with special high performance coating may have lengthened cure times. Consult the manufacturer for cure times of these films.

Table 1 - Typical Cure Times

Film thickness in mils	Film thickness in microns (μ)	Typical Cure Time In Days
Up to 4	Up to 100	30
4 to 8	100 to 200	60
8 to 12	200 to 300	100
Over 12 but not more than 17	Over 300 but not more than 425	140