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## Whirlpool Corporation Comments on AHAM Range Hood Program and Directory Approval

Additional submitted attachment is included below.



February 14, 2020

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

RE: Docket No. 19-BSTD-10; Revised Application for Approval of Association of Home Appliance Manufacturers (AHAM) Product Directory for use in place of Home Ventilating Institute (HVI) Directory for Kitchen Range Hoods

Whirlpool Corporation, the world's leading major home appliance company, strongly supports the approval of the Association of Home Appliance Manufacturers (AHAM) application for authorization for an alternative procedure to demonstrate compliance with Title 24, Part 6, specifically as it relates to the minimum ventilation airflow rate as specified in Section 5 of ASHRAE 62.2 and the maximum sound rating as specified in Section 120.1(b)2Avi.

Whirlpool Corporation markets and sells a wide selection of kitchen range hoods, including over-the range microwaves, under several brand names, including Whirlpool, KitchenAid, Maytag, Amana and JennAir.

The recognition and approval of the AHAM certification program and directory would provide product manufacturers with an alternative option for certification and would encourage competition, program quality and cost effectiveness. Additionally, the AHAM program and directory would increase lab availability and help address the existing backlog for testing.

AHAM has clearly demonstrated that its certification program and directory are equivalent to HVI's program and directory. Furthermore, AHAM has carefully addressed all concerns raised by HVI and is committed to public announcements of the AHAM directory and outreach to all HERS raters to ensure awareness of the AHAM directory and to eliminate confusion.

Whirlpool Corporation strongly urges the Commission to approve the AHAM application and provide manufacturers with an alternative option for range hood certification. Please do not hesitate to contact me at 202.286.9308 or by email at luke\_m\_harms@whirlpool.com should you have any questions.

Sincerely,

Luke M. Harms

Director, Government Relations