

DOCKETED

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Jeff Miller, PE comments to docket 20-AAER-02 regarding 2nd 15-day language (TN247065) for proposed air filter label regulations

Additional submitted attachment is included below.

Date: November 04, 2022

Subject: Jeff Miller, PE comments to docket 20-AAER-02 regarding 2nd 15-day language (TN247065) for proposed air filter label regulations.

I recommend that the express terms posted to docket 20-AAER-02 for the 2nd 15-day comment period (TN247065) be revised to reinstate the requirement for air filter labels to be either visible through the retail product packaging, otherwise the same information should also be marked on the retail product packaging. Refer to figure 1 below that has highlighted this language. Note there is a similar recommendation in the marked-up express terms language I submitted in TN245902. The language in Figure 1 that I recommend be restored to Section 1607(d)11 reads as follows:

"If the marking on the air filter is not legible through its retail packaging, then the packaging shall also be marked with the same information and in the same format."

Figure 1. Clip from 2nd 15-day express terms (TN247065) with highlighted stricken label visibility (legibility) language in first paragraph of Section 1607(d)11.

(11) Air Filters. Each unit of air filters manufactured on or after ~~December 1, 2022~~ ~~April 1, 2023~~ ~~July 1, 2024~~, shall be marked, permanently and legibly, on an accessible and conspicuous place on the ~~edge of the filter itself or on the pleats~~ ~~edge of the filter itself or on the pleats, filter retail package~~ in characters of font size 12 or larger, with the information specified in either section (A) or (B) below as applicable to the air filter unit. ~~In addition, each unit of air filters manufactured on or after January 1, 2026, shall be marked, permanently and legibly, on an accessible and conspicuous place on the edge of the filter frame in font size 12 or larger characters, with the calculated airflow rate value at an Initial Resistance of 0.1 inches water column (cubic feet per minute), and with either the filter's particle size efficiency in the 0.3 to 1.0 micrometer range or the filter's MERV rating.~~ **If the marking on the air filter is not legible through its retail packaging, then the packaging shall also be marked with the same information and in the same format.** Sample air filter markings package labels and air filter frame markings are shown in Tables Z-1 ~~and~~, and Z-2, ~~and Z-3.~~

The air filter label is expected to enable home owners and field technicians to make informed selections of air filter replacement products that:

- conform to the design requirements of their space conditioning systems, and
- comply with Title 24 Part 6 air filter performance requirements.

With the current draft of the 2nd 15-day comment period express terms (TN 247065), it is possible for manufacturers to be in compliance with the air filter labeling regulations even if their air filter product packaging prevents the label from being visible/legible to persons who need to view that information. If

the label is not visible to persons shopping for replacement air filters, then one of the expected main benefits of air filter labeling would be defeated.

Thank you for the opportunity to comment.

Sincerely

Jeff Miller