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Additional submitted attachment is included below.

Date: December 18, 2022

Subject: Jeff Miller, PE comments to docket 20-AAER-02 regarding 3rd 15-day language express terms (TN247899) for proposed air filter label regulations.

I recommend that when this air filter regulation language is eventually adopted and prepared for publishing, that CEC staff devote some care to formatting the graphic representation of the sample air filter label markings shown in Tables Z-1 and Z-2, such that when these regulations are finally published they truly provide a representation of the marking staff recommends be printed on air filters. Thus manufacturers of air filters might be able to view the graphics in Tables Z-1 and Z-2 in the adopted regulation published by the CEC and know with greater clarity what the layout and formatting of the marking is intended to be.

The appearance of the sample air filter markings shown in tables Z-1 and Z-2 in the 3rd 15-day language express terms (TN247899) apparently suggests that text contained in rows should not be aligned, and that single words should not fit entirely within the width of a single column. A copy/clip from the 3rd 15-day language express terms (TN247899) Table Z-2 is shown in Figure 1 below with marked-up indication of the locations of these improperly formatted features. Note in Figure 1 that in the second column, “(μm)” and “(%)” are out of alignment with the other text in their respective rows; and in the heading of the third column, “0.30-1.0” has wrapped into two rows of text instead of being consistent with the fourth and fifth column headers that use only 1 row of text; also the word “Resistance” in the 6th column has been split into two rows of text.

Presumably, there are recent font size requirements imposed on CEC publications that have made it challenging to fit a properly formatted representation of the intended air filter label marking within the width of the margins of an 8.5” x 11” printed page. Note that the air filter label marking, when implemented on an air filter frame, will not be constrained to fit in the same width dimension as the 15-day language publication. Since the graphics in tables Z-1 and Z-2 provide explicit guidance for the formatting and layout of the air filter label marking intended to be implemented on the air filter frame, I recommend that CEC staff work with any available and allowable formatting options that could be leveraged to perfect the final appearance of the air filter label markings in tables Z-1 and Z-2, thus to publish final regulation language that provides properly developed explicit direction to manufacturers of air filters for implementing these label markings on their air filter products.

An example of the improvements to the appearance of the layout and formatting I recommend is shown in Figure 2 below. The graphic in Figure 2 displays a copy of the air filter label marking layout and formatting that was posted in the 15-day language adopted by the 2015 air filter label rulemaking (although the asterisk that should be placed next to “val 5” was erroneously missing from that posting). The same layout and formatting is published in the Appliance Efficiency regulations available at the following URL:

[https://govt.westlaw.com/calregs/Document/ID6658AC35CCE11EC9220000D3A7C4BC3?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=\(sc.Default\)&bhcp=1](https://govt.westlaw.com/calregs/Document/ID6658AC35CCE11EC9220000D3A7C4BC3?viewType=FullText&originationContext=documenttoc&transitionType=CategoryPageItem&contextData=(sc.Default)&bhcp=1)

Figure 3 below is a photograph of the 3M manufacturer’s current commercially available implementation of the marking shown in Figure 2.


Figure 1. Markups indicating formatting deficiencies in Table Z-2 from the 3rd 15-day language express terms in docket 20-AAER-02 (TN247899).

MERV	(μ m)	0.30-1.0	1.0-3.0	3.0-10	Airflow Rate (CFM)	[val1]	[val2]	[va3]	[val4]	[val5]*	<u>*Max Rated Airflow</u>
[val]	PSE (%)	[val]	[val]	[val]	Initial Resistance (IWC)	[val]	[val]	[val]	[val]	[val]	

Figure 2. Table Z copied from the 15-day language from the 2015 air filter label rulemaking.

MERV	(μ m) PSE	0.30-1.0	1.0-3.0	3.0-10	Airflow Rate (CFM)	[val 1]	[val 2]	[val 3]	[val 4]	[val 5]	<u>*Max Rated Airflow</u>
[value]	(%)	[value]	[value]	[value]	Initial Resistance (IWC)	[value]	[value]	[value]	[value]	[value]	

Figure 3. Photograph taken in September 2022 of a 3M air filter on the shelf at a local Lowes store which displays the implementation of the air filter marking layout and formatting adopted by the 2015 air filter marking rulemaking (as shown in Figure 2).



MERV	(μ m) PSE	0.30-1.0	1.0-3.0	3.0-10	Airflow Rate (CFM) Débit d'air (pi³/min)	495	740	985	1230	1665*	<u>*Max Rated Airflow</u> <u>*Débit d'air nominal max</u>
13	(%)	62	87	95	Initial Resistance (IWC) Résistance initiale (IWC)	0.08	0.13	0.18	0.26	0.39	

Thank you for the opportunity to comment.

Sincerely,

Jeff Miller