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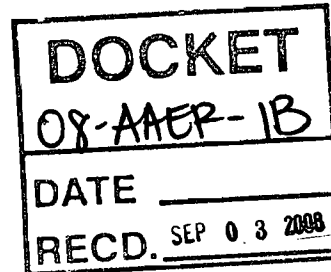
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Regarding the latest issue on Title 20, RELATED TO THE motor efficiency reporting as it would apply to the motor mfg.— While we should support the concept of the motor mfg being required to report the efficiency of their motors because the motor efficiency is a key part of calculating the efficiency of a pump, we cannot require that replacement motors intended for pumps which have already been installed in the field be subject to the Title 20 req'mnts. The reason for this is that by subjecting the replacement motors to the rules, we are encouraging the practice of replacing motors on pumps with motors that may not necessarily be 'compatible with' the original equipment motors.

This is a very serious issue. When a motor is replaced with something other than an identical replacement, any safety certifications which the pump may have had are effectively nullified or voided. Specifically, any certs such as UL, ETL, CSA, and NSF are voided when a replacement part that isn't certified for use with the certified pump, is installed on the pump. Although we all know that this practice occurs in the field, by non-manufacturer related/unauthorized pool service organizations, I don't think that any pump manufacturer will go on record and endorse such a practice because of the potential legal exposure that they can be subjected to if their product was involved in any sort of a safety-related issue.

A pump is carefully designed and tested, by a manufacturer, with a specific motor or motors. By installing a motor that hasn't been properly tested and qualified by the manufacturer, the pumps performance and safety can be seriously compromised.

This is a very important point which apparently was not considered when this issue was reviewed by everyone involved.

Please make sure that the CEC staff is aware of this. I will be sending similar correspondence directly to Harinder Singh at the CEC as well.

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