



# Northern California Valley Sheet Metal Industry Joint Apprenticeship and Training Committee



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Mark Paavola  
Administrator

## Docket # 10-BSTD-01

### Proposals For Certification of Acceptance Testing Field Technicians For Mechanical Systems and Lighting Controls

<b>DOCKET</b>	
<b>10-BSTD-01</b>	
DATE	Feb. 29 2012
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Below you will find our comments regarding the current proposal. We will provide information in the areas that we have expertise in the subject matter.

1. Is it appropriate for the Standards to require Field Technicians who perform acceptance testing to meet specific training and certification requirements?

Yes, this will help to define the procedure and provide adequate safeguards to ensure a good quality installation.

2. Would current Field Technicians who perform acceptance testing be disadvantaged by training and certification requirements? If yes, how should training and certification requirements be designed to provide a reasonable path for these persons to become qualified?

They are not disadvantaged by the requirements. Any person may obtain the certification required to do the work. It is not any different than requiring contractors to be licensed to perform their duties.

3. How would training and certification requirements for Field Technicians who perform acceptance testing help to address concerns related to any lack of enforcement by building departments of the acceptance requirements?

This will help to insure a proper and quality installation. The certified technician will not have any reason to rush through a project to make deadline. The technician also has a third party certification organization that will help insure that the testing is performed as required.

8. Are testing, adjusting and balancing (TAB) contractors, who meet all of the apprenticeship, experience and testing requirements of the Associated Air Balance Council (AABC), National Environmental Balancing Bureau (NEBB) or the Testing Adjusting and Balancing Bureau (TABB), uniquely qualified to serve as acceptance testing Field Technicians for HVAC equipment and controls?



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No, they are not uniquely qualified but they represent the largest and best pool of technicians currently available that meet the needs of this program. These organizations allow the state to not create a new certification but use existing groups that can perform the work.

9. Should licensed mechanical contractors, who are installing contractors, start-up contractors, or service contractors, that are not certified TAB contractors be allowed to serve as acceptance testing Field Technicians for HVAC equipment and controls?

No, there is no requirement as a mechanical contractor to possess the skills and equipment needed to perform the required tasks. If you have a certification requirement to perform the testing you will have a much greater impact in the energy savings sector. The mechanical contractors have demonstrated that as a group they are unable to currently perform a quality installation of the equipment. There is a tremendous amount of equipment improperly installed in the state. There should be a requirement for independent verification of the install if this program is going to realize its goal.

10. Should licensed mechanical engineers be allowed to serve as acceptance testing Field Technicians for HVAC equipment and controls?

Again no, most mechanical engineers do not have the needed field experience to test the equipment. They also are unlikely to possess the current needed certification to test the equipment. (EPA 608 certification).

11. Should building commissioning providers be allowed to serve as acceptance testing Field Technicians for HVAC equipment and controls and for lighting controls?

See above.

12. If additional persons other than those that are proposed by IBEW or the Sheet Metal Workers are allowed to serve as acceptance testing Field Technicians, should they be certified for professional qualifications? If so, what certifications would be appropriate for the additional persons (e.g. licensed contractors, engineers, or building commissioning providers)?

We feel that this will create additional work to get this proposal operational and not provide a clear and precise start to the proposal. The classifications you have listed for the most part do not have the skill set needed to perform the procedures correctly or in a timely manner.



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15. If TAB certification is required for acceptance testing by a Field Technician, should that be limited to acceptance testing related to airflow?

No, the training and education that a TAB technician receives is far greater than just measuring airflow. The training also covers the equipment operation, how to operate the control system or bypass as needed. In our training center all TAB technicians also receive 2 years of service training to give them the skill set needed to perform the testing.

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