

Regards the Draft 2 Version.

Under Section #2 Qualifying Products.

It is mentioned in a box that in order to be HVI certified you will not have to test in HVI labs - As far as I know the only way to get product HVI certified is by testing in HVI's (AMCA) labs. If this is not the case let me know.

Under Section #3 Specification Requirements for Qualifying Products.

Regards Range Hood Working Speed Rating - We are of the opinion that the Working Speed Ratings for range hoods is misleading and confusing to consumers - It is of no value and is a marketing tool. It gives no true indication of product performance.

Under Section #4 Table 3 the Indicate Sone levels.

For Bathroom Fans & Utility Fans 76 to 130 CFM - I would only mention that the 2.0 sones criteria is too high and should be lowered to 1.5 sones as many of the newer building codes are requiring to at least a 1.5 sones rating to be used. Manufacturers of these fans know this to be a fact.

Regards the Installed Fan Performance section - and the comment regards sound testing at 0.25" Static Pressure - you mention that many older fans are not tested at 0.25 SP - The same argument can be made for the Range Hood Working Speed Ratings.

Thanks,

Joe Kennedy