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Subject:	Continued Concerns Over Proposed Study, Need In Person Meeting to Develop More Appropriate Scope
Date:	Friday, November 1, 2019 8:45:35 AM
Attachments:	NAHB Synopsis.pdf NAHB TX A&M Report.pdf

Dear Dr. Prevatt and Mr. Madani,

Thank you for the recent inclusion as a stakeholder with regards to the proposed study of the products our manufacturers make, vinyl siding. We think the formation of an advisory group is a good first step to creating a research proposal that will be impactful to improving how products perform in high wind events.

Although we are looking forward to collaborating with you, we continue to have concerns about the details of the proposed study as currently written.

Our current concerns are as follows:

- The advisory group is just now being set up, but the scope of the study seems to be set. We want the advisory group to act in all parts of the research including the development of the scope of study. Also, we want decisions made on the study to be done so using a consensus-based decision-making process. Our concern is the advisory group will be nothing more than a group that was set up but had no real impact or function. We are willing to meet in person to work on this scope and make it something that will help to improve the built environment.
- The research proposal seems to draw conclusions before any research has even been conducted. Pressure Equalization Factor (PEF) has been in place for decades. PEF has been researched, discussed, and deliberated over this period by the leading experts on this issue, and further, consensus has been reached through the ANSI accredited ASTM process. The research proposal makes no mention of this or that an increase in PEF will be adopted by the 2020 Florida code through the adoption of the 17 ASTM standards.
- We continue to contend there is no current clear FIELD evidence that the current PEF is inadequate. Yet the proposal's deliverables include "failure mechanisms", "PEF recommended for the two systems," and "the failure mechanism observed (if any) and recommendation for a future Product Approval standard for vinyl siding systems." These deliverables are not acceptable to our industry nor likely even possible at this stage of research. Additionally, this research should not result in product approval standards. It should result in information which may or may not determine the next step and could determine if changes are necessary through ANSI based consensus making processes such as ASTM.
- We have, still, not been provided any specific field evidence that shows PEF is an issue with failures and have asked repeatedly for this. We can help to study this issue further but don't believe it is an area that warrants much focus based on field evidence.
- Our field evidence indicates siding installation warrants the most focus as this is the root cause of the highest frequency of documented failures. This study will not address this issue at all. Better understanding and enforcement of proper installation would make the most substantial improvement to vinyl siding performance in wind events. We offer to put together a test plan that will use the D5206 test method to show how poor installation techniques lead to failure. We can then take this information and communicate it to impacted stakeholders that will address real field failure issues.

There are other concerns we have with the research proposal.

We think the next best step is to hold an in-person meeting to develop a research proposal whose goal is to learn and impact field issues instead of writing new performance standards that will have little if any impact on currently identified field performance issues.

As additional evidence of our position, NAHB and Texas A&M recently published a report which supports how well our modern codes work and that wall assemblies are not a major issue in wind events. The report is attached.

Please let us know when we could meet in person to continue to move forward.

Regards,

Matt

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VSI is on the Move!
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