

Hello, Mo:

Thanks very much for your note. I also received your previous e-mail in which you provided the February meeting of the Florida Building Commission – I appreciate your sending that information also.

Attached is a letter from our President and CEO, Mr. Bob Rasp. In it he voices our concerns over the new 4.0 COP requirements in the 2006 revisions to the 2004 Florida Building Code, as it applies to heat pump pool heaters. Please forward this letter to the appropriate Building Commission staff. As Bob indicates in the letter, we would respectfully request the Commission to set up a time during the February meeting during which we (including other Heat pump pool heater manufacturers) could discuss this issue with Commission staff and Codes & Standards staff. We realize that it is quite short notice at this time, but this subject is very important to the Heat pump pool heater manufacturers.

Please stay in touch with me via e-mail or via phone to keep me filled in on any developments in this area. I will be at the Tampa meeting along with other heat pump pool heater manufacturers. I look forward to meeting you.

Best Regards,

Shajee Siddiqui

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From: Mo.Madani@dca.state.fl.us [mailto:Mo.Madani@dca.state.fl.us]
Sent: Monday, January 22, 2007 10:29 AM
To: Shajee Siddiqui
Subject: Re: Thanks for your time to discuss the Heatpump COP requirements

Shajee, see if you can provide data on the COPs of existing equipment Also, is the problem with certain capacity units or is it that just some manufacturers are not yet capable?

Thanks
Mo

To
<mo.madani@dca.state.fl.us>
cc

Subject
Thanks for your time to discuss the Heatpump COP requirements

Mo:

Thanks very much for your time this morning to discuss the addition of the 4.0 COP rating for Heat pump pool heaters into the Florida Building Code.

As I indicated, as far as we know the 4.0 COP requirement, as currently written into the Florida Building Code, is a target that no manufacturer can currently meet for all their product offerings. We believe that in saying so we speak for the entire heatpump pool heater industry. By immediately beginning to enforce such requirements the state of Florida may unintentionally end up effectively banning heat pumps from the Florida pool/spa market.

While we support legislative and industry efforts to require products with increasingly better efficiencies and also support third-party testing of products to confirm manufacturers' claimed ratings, we would also submit that appropriate time must be given to manufacturers to develop and test new products which would be capable of reliably meeting improved efficiency and performance requirements.

Significant redesign of existing technology is required to be able to meet the new 4.0 COP requirements which have been adopted in the Florida Building Code. It is our belief that it would take the industry a few years to be able to offer products which can consistently and reliably meet the required 4.0 COP target. These new requirements have apparently been adopted without any phase-in period which would allow manufacturers the time required to properly develop and test products to meet the new targets.

During our phone conversation, you had mentioned that the Florida Building commission would be holding a meeting between February 5 and February 7th in Tampa, Florida during which there will be a Public Comments section/hearing in which manufacturers such as ourselves could have the opportunity to voice our concerns with the new requirements. Can you please send me more details regarding the meetings and what steps we need to take to be a part of the Public comments portions?

I look forward to hearing back from you soon.

Best Regards,

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