



Dear Mr. Baker,

It has come to my attention that CARB is proposing that panel manufacturers label each and every panel they produce and ship. This would cause a serious hardship for my business. I am a California based company and I can't handle any additional regulations to be pushed onto my business.

In my business we purchase thin MDF. This MDF is then painted on one or two sides and sold to door manufacturers. These doorskins must have a perfect paint job. Any small defect and they are rejected by my customers, defects as small as the head of an eraser will cause a rejection.

I have heard proposals tossed around with regards to labeling. However, no technology exists that I am aware of will not cause me severe disruption. For example. The panels I buy are 2.8 mm thick. These are much too thin for edge printing. Stickers on the surface of the panel would have to be removed before painting. I paint over four million panels per year. There is no way I could spend the man-hours to remove four million labels. Additionally, any sticker residue would interfere with painting. In the past, I have purchased MDF from manufacturers that used ink stamps on the surface of the panels. These stamps often bleed through the painting process and cause a defect on the doorskin. There are no labeling solutions for individual panels that I am aware of.

When I ship my finished product it is ready to be made into a door. The units I ship are properly labeled per the CARB requirements. If you change the requirements and I have to label each panel it will ruin the product for my customers.

Please reconsider your proposal for labeling each panel. It really is not a practical solution.

Sincerely

Gary Colledge

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Collegewood Inc