



S I N C E 1 8 8 6

July 15, 2008

Ms. Susan Lum  
Ms. Margaret Jenkins  
California Air Resources Board  
Research Division, Fifth Floor  
1001 I Street, P.O. Box 2815  
Sacramento, CA 95814

Subject: 15-day Proposed Regulation on Air Cleaner Ozone Emissions  
Subchapter 8.7, Sections 94800-94810

Dear Ms. Lum and Ms. Jenkins:

Hunter Fan Company is a producer of high quality and high performance portable room air purifiers. We are also active members of the Association of Home Appliance Manufacturers, (AHAM)

We are writing to add our individual support to the comments that AHAM has submitted to you.

In particular, Hunter Fan appreciates the change made to Section 94802 allowing additional time for manufacturers and others to have their devices tested for certification by ARB audited laboratories. We believe that extending the compliance date from 12 months to 24 months will be essential to having the ability to meet the effective date.

With regard to definition #20, Mechanical Filtration, Hunter Fan has many air purifiers that are in this classification. We agree that the discussion of appropriate filter materials should include "including those treated with an electrically charged filter medium." We believe the definition should read,

(20) "Mechanical filtration only" means removal of suspended particles from air only via filtration with physical barrier, non-electronic techniques, i.e. air is forced through a filter medium. Materials used in the construction of the filter media may include substances such as activated charcoal, paper, foam, synthetics, ceramics, or natural fibers, including those treated with an electrically charged filter medium.

Hunter Fan appreciates the changes made to the Certification Requirements, Section 94804, and we believe these will assist the ARB in processing the certification of air cleaners. However, we would suggest one change in Section 94804 (c) (D) "Serial number of devices submitted for testing (where applicable). Many portable appliances such as air cleaners do not have a serial number, but use the manufacturing date code instead.

Hunter Fan also appreciates the additional 180 days to meet the labeling requirement as provided for in Section 94806 (a). Hunter Fan is not in control of the date of sale. The additional time granted in this proposed regulation will assist us in working with retailers to have available compliant product by the effective date and date of labeling. We are concerned with the numbers of units that require laboratory examination, the amount of time needed to test and the time

needed to move product through the supply chain. As of today there are no laboratories approved by the ARB for testing. Thus, we have very little time to obtain test results and move product through to retailers. We will report to the Air Resources Board next year on our progress.

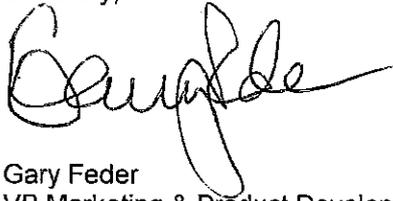
Hunter Fan also recommends modifying the definition of Listing mark:

(17) "Listing mark" means the symbol used by Underwriters Laboratories, Inc. to indicate that a representative sample of the product bearing the symbol meets certain UL safety criteria. The safety criteria are found in UL nationally recognized Standards 867 and 507 for air cleaning device safety.

#17 should be changed to reflect that there are other NRTL's aside from UL (ETL for example) and the definition of the listing mark should not be limited to Underwriters Laboratories.

Hunter Fan acknowledges the hard work of the Staff and Board of the ARB, and appreciates their consideration of our comments. We look forward to working with the ARB in the implementation of this important regulation.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Feder", written in a cursive style.

Gary Feder  
VP Marketing & Product Development, Home Comfort Products  
Hunter Fan Company