

Subject: Air Cleaner Regulation Comments

From: Michelle Arney <marney@sharperimage.com>

Date: Fri, 05 Jan 2007 13:44:38 -0800

To: aircleaners@listserv.arb.ca.gov

Dear Peggy & others at the CA Air Resource Board:

Thank you for hosting the recent public workshop concerning the Air Cleaner Ozone Regulation and Peggy, for our phone conversation afterward. We at The Sharper Image are very much supportive of your efforts to limit the sale of ozone generators in California. I will also add that we have been very impressed with your group's ability to understand the issues relating to the fairly complicated area of air purifiers. More specifically, there is a lot of confusion among even professionals with respect to the difference among the various technologies existing in the world of air purifiers. This has been an ongoing challenge for The Sharper Image in that we sell some air purifiers which emit small levels of ozone as a by-product, but are not ozone generators. The line between the two technologies is often blurred by those who don't understand the technologies and it is very refreshing to see that your group has understood the differences and is contributing toward drawing the line accordingly.

The Sharper Image has some comments in the area of the ozone testing protocol which I will share here:

We appreciate the limitations of the current UL867 protocol and are aware that there is an ad hoc committee reviewing that protocol currently with Underwriter Laboratories. We understand that the current protocol contains enough "wobble room" that the results can be variable depending on where within the protocol the test is run. For example if one were to test at both extremes of the temperature and humidity range allowed within the protocol, one would get very different results. We also understand that the specification that the second background measurement be taken "immediately after this test" also allows for inconsistency in results depending on one's interpretation of "immediately".

We are concerned, however, with one of the Board's suggested concepts of potentially eliminating the post-test background measurement. We fear that eliminating this second background measurement would provide us with a different result. Because the 50 ppb limit is tied to the protocol, if the protocol were to be changed in such a way that it provided a different result, the 50 ppb should theoretically be reevaluated in that light as well. We understand that there is no room within the regulations to reevaluate the 50 ppb result (nor are we advocating that at this time), therefore it is important to avoid modify the UL867 protocol in any way that significantly changes the result of the test.

The Board's alternative suggested concept of refining the post-test background measurement is preferable. As with the reasoning above, it is important that the post-test background measurement be taken at a time after the test which does not significantly alter the results of the test. Ideally, the refinement of the second background measurement does two things: it decreases the variability of the results of the test and it does not significantly change the results of the test. Perhaps one way to approach this is to understand the history of how the larger testing facilities (Underwriters Laboratories, Intertek etc.) have interpreted the term, "immediately", in the protocol and attempt to define this time frame in the protocol. This would narrow the variability without significantly changing the results of the test from those obtained historically at least at these larger testing facilities.

Thank you again for your work in this area. We look forward to participating in the process moving forward.

Sincerely,

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