**Comment/Explanation\*:***Include your justification for your proposed change to the draft standard below.*
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While we understand the content, BER believes that this exemption should not exist as ductwork can still be improperly installed in short runs as well as CFM/Watt still capable of being negatively impacted by ducts with too small diameter or a restrictive return-side. BER believes this section should be removed and Blower Fan watt draw should be tested to ensure there are no issues causing higher than designed blower watt draw.

**Proposed Change to the Draft Standard\***
*Use “strikethrough” and “underline” formatting to indicate all proposed changes. Changes must be shown with “hard-formatting” strikethrough and underline, not “track changes”.*\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_

* + 1. ~~If the Forced-Air HVAC System is entirely in Conditioned Space Volume [[1]](#footnote-1) and has a supply-side distribution system with a total length that does not exceed 10 ft., inclusive of both ductwork and building cavities used for distribution, then measurement of the Blower Fan watt draw shall be exempted and the Blower Fan watt draw grade shall be designated in accordance with Section 7.9.~~
1. (Informative Note) Per the definition, an HVAC System comprises both the equipment and the distribution system, if any. Therefore, both must be in Conditioned Space Volume to meet this intent. A Single Packaged System is considered to be in Conditioned Space Volume if the interior side of the package and the distribution system, if any, is in Conditioned Space Volume.

\ [↑](#footnote-ref-1)