August 1 2014

Mr. Carvin DiGiovanni
Association of Pool and Spa Professionals
cdigiovanni@apsp.org

Subject: Public comment on NSF/ANSI 50-2012 *Recreational Water Facilities* pump efficiency and performance (50i77r1).

Dear Mr. Digiovanni:

Thank you for your ballot and comment on NSF/ANSI 50-2012 *Recreational Water Facilities* (50i77r1). Below are your comments in *italics* and the response from Tom Vyles, issue proponent, in **bold**.

*Submitter Comment: APSP, representing the industry's leading pump and motor manufacturers, objects to this proposed language for the following reasons:*

6.6.2. *As currently proposed, the revisions to section 6.6.2 introduce confusion. The second bullet point commingles three speed pumps/motors with those with more than three fixed speeds, and then it requires all to be tested at three speeds. Below is one possible solution while keeping the apparent intent of the change. Replace: - Three (3) or multispeed pump or motor assemblies, test at each of the 3 speeds; or

**With: - Multi speed pump or motor assemblies, test at each speed; or**

6.6.3 Limits energy efficiency performance testing to one of two standards, California Energy Commission CEC-400-209 Title 20 or USEPAs Energy Star Pool Pump Performance. While this is an optional test, because it list just two energy efficiency standards, it does not allow manufacturers the option of testing products to other standards including CEE High Efficiency Residential Swimming Pool Pump Specification, CSA C840 - 2012 - Performance of pool pumps, or ANSI/APSP/ICC-15 standards for Residential Swimming Pool and Spa Energy Efficiency. Test labs can test to any standard they choose, therefore this section should be deleted without substitution. It is anti-competitive at worst and meaningless at best.

*Response: Thank you for your comments. We have accepted proposed revisions concerning the multispeed pumps as well as other comments from industry on this ballot and will*
submit a revision which should clarify the requirements. The Energy Star reference was added since the requirements are the same as the current NSF 50 and CEC requirements.

Adding the references to the CSA, APSP/ICC standards may (or may not as you suggest) also be a good idea however it goes beyond the scope of this ballot and would require a new issue paper which would require comparison of test requirements in these standards to the existing. An issue paper is attached to this response for this purpose.

I hope the above addresses your concerns with this issue. Please respond in writing (electronic is preferred) if you are satisfied with the response by August 15 2014. If we do not hear from you by that date, we will presume your comments have been resolved. If you have additional comments, or wish to discuss these points further, please contact me directly.

Thank you again for your thorough review.

Tom Vyles, Chairperson
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